

**Georgia Department of Natural Resources**  
**Environmental Protection Division**

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334  
Judson H. Turner, Director  
(404) 656-4713; Fax: (404) 651-9425

April 13, 2015

VIA EMAIL & REGULAR MAIL

**FILE COPY**

Joe Renzetti, President  
Roper Pump Company  
3475 Old Maysville Road  
Commerce, GA 30529

Re: HSI Site Number: 10901  
Roper Pump Company  
Tax Parcel ID #034-032  
3475 Old Maysville Road  
Commerce, Jackson County, GA

Dear Mr. Renzetti:

The Georgia Environmental Protection Division (EPD) has received the December 2014 Voluntary Investigation and Remediation Plan (VIRP), that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by Environmental Planning Specialist, Inc. (EPS) on behalf of Roper Pump Company. After completing its review of the application, EPD has prepared the following comments:

- 1) According to EPD's August 22, 2014, letter, it was noted that regulated substances were detected in the sediment from the surface water outfall area to the east of the site. The 2014 VRP Application did not include any assessment(s) of potential human health and ecological receptors associated with the surface water and sediment exposure pathway related to this surface water outfall. Once it has been established that the sediment and surface water are potentially complete exposure pathways for a release from the site, EPD requests that the VRP Application and Plan include, at a minimum, plans to conduct a Screening Level Ecological Risk Assessment (SLERA) in accordance with the U.S. EPA Ecological Risk Assessment Guidance for Superfund (ERAGS)<sup>1</sup> and U.S. EPA Region 4 Ecological RAGS Bulletins<sup>2</sup>. The ERA should also be consistent with U.S. EPA's eight step ERA process and include the following:
  - a. A comparison of onsite and offsite levels of COIs in sediment to the US EPA Region 4 Ecological Sediment Screening Values.
  - b. A description of the aquatic habitat(s), potentially impacted organisms, and their exposure pathways associated with the onsite drainage ditch and Dillon Branch Creek.

<sup>1</sup> U.S. Environmental Protection Agency, Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments, June 1997. Available at: <http://www.epa.gov/oswer/riskassessment/ecorisk/ecorisk.htm>

<sup>2</sup> USEPA November 2001. Supplemental Guidance to RAGS: Region 4 Bulletins, Ecological Risk Assessment. Originally published November 1995.

- 2) According to EPD's August 22, 2014, letter, the VRP Application and Plan would include a comprehensive evaluation of the vapor intrusion (VI) pathway, taking into account the noted recommendations from OSHA in the event that the known contaminants are still in use at the facility. Please specify if the chemicals identified as part of the vapor intrusion/inhalation exposure pathway evaluation (PCE, TCE, etc.) are still in use at the facility. In the event that these identified chemicals are not currently in use, please note that non-residential screening values should be applied rather than OSHA PELs. In addition, should non-residential screening values be applied please note that the VI sub-slab detections of PCE and TCE already exceed the EPA VISL calculator sub-slab non-residential screening levels at a risk level of  $1 \times 10^{-5}$  with a hazard quotient of 1.
- 3) Additional groundwater investigation activities will need to be conducted in order to meet the groundwater delineation requirements for the site in accordance with Section 12-8-108 of the VRP Act. In addition, the site will need to utilize the additional delineation and characterization data to determine a "point of exposure" (POE) and corresponding "point of demonstration" POD for the groundwater exposure pathway. The additional groundwater delineation and characterization activities should include, but not be limited to, the following:
  - a. Section 102-8-108(8) of the Act states that, "compliance with site-specific cleanup standards that require that source material be removed may be satisfied when such material is removed, decontaminated, or otherwise immobilized in the subsurface, to the extent practicable." The 2014 VRP Application indicated that the concentrations of PCE in groundwater in the area of MW-7 and SB-9, and former B-10 boring location, are representative of potential source material, i.e. dense non-aqueous phase liquid (DNAPL). Therefore, EPD requires that data be provided to demonstrate that sufficient investigations have been completed to determine the potential extent of the subsurface PCE source material, and propose a corrective action to remediate the identified source material to the extent practicable.
  - b. Additional groundwater plume characterization is required at the following locations in order to complete both the CSM and the horizontal groundwater delineation requirements in accordance with Section 12-8-108 of the VRP Act:
    - i. North of MW-10, TW-8, TW-1
    - ii. East of MW-8, MW-3, and MW-11,
    - iii. South of B-10, MW-11 and TW-4,
    - iv. West of TW-1.
  - c. Due to the groundwater impacts at varying depths and the potential for DNAPL to exist at the site, additional groundwater plume characterization is required at the following locations in order to complete both the CSM and the vertical groundwater delineation requirements in accordance with Section 12-8-108 of the VRP Act: vertical characterization proximal to and downgradient of the area classified as containing potential source material, specifically around MW-7 and boring B-10. Particular care should be taken in identifying any preferential migration pathways that may exist within the overlying soil formations and associated bedrock material(s).

- d. Metals at levels above acceptable standards were identified and removed from soils/sediments as part of previous corrective measures at the site, thereby qualifying these constituents as COIs at the site. Therefore, please incorporate a baseline analysis of arsenic, lead, chromium, hexavalent chromium, mercury, and cadmium into future groundwater assessments.
- 4) Please update the two cross sections to include the following:
    - a. Soil classifications and descriptions within the “residuum soil,”;
    - b. Lateral and vertical extent of previous excavations;
    - c. Soil vapor extraction (SVE) system components;
    - d. Drainage/utility conduits and/or preferential pathways; and
    - e. Soil borings/sample locations where applicable.
  - 5) Please provide soil sampling data to address the delineation requirements for the following areas: north of B-1, south and east of SB-4 through SB-7, south/southwest of SB-104/-108/-111/-113/-118, west of SB-121/-122, and west/north of the initial loading dock excavation area (BE-1 through BE-10) and SVE installation as this area was only excavated and investigated to 1-ft. below the ground surface. Please note that the depth of impacts to the soil range from 1-ft down to groundwater, which is approximately 18-24 bgs in the area of impact.
  - 6) Please provide a figure illustrating property owner and property use information for all abutting properties.
  - 7) Section 2.2, Regulated Constituents of Interest (COIs) and Delineation Criteria, indicates that the COIs for soil and groundwater are determined based on more than one result exceeding the delineation criteria and having greater than 1% of the results exceeding the criteria. Please note that all constituents that have exceeded the established RRS and delineation criteria should be identified as a COI. EPD understands that certain COIs will drive the remedial strategies, but please note that the final VRP CSR should certify compliance for any identified COI that has exceeded an established standard throughout the span of the investigation and cleanup activities, including any known impacts to surface water and/or sediment.
  - 8) Section 3.4.2, Nature and Extent of Environmental Conditions, indicates that since the chromium and lead impacted sediments from the storm water outfall area were removed to below residential RRS, “metals are no longer COI for the Site.” EPD does not concur with the statement that these two metals are not part of the site related COI list. In addition, a comprehensive investigation of metals in soils and groundwater on the site property, and the adjacent metal plating operation, has not been completed as requested in EPD’s August 22, 2014, letter.
  - 9) Section 3.4.2.8 of the VRP Application does not indicate that any additional investigation activities were conducted to address the sub-slab vapor sample VI-4 that detected benzene at a concentration of 92,000  $\mu\text{g}/\text{m}^3$  (along with minor detections at nearby locations VI-3 and VI-5). At a minimum, an explanation should be provided as to the source of this abnormality in the sub-slab vapor data. In addition, the VRP VI evaluation did not include a description of the sampling procedures, including the status of the SVE system during sample collection.

- 10) Please provide a storm sewer assessment and a figure illustrating all onsite above ground and in-ground storm sewer/drainage conveyances and/or utility corridors.

The above listed comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Roper Pump. However, failure of EPD to respond to a submittal within any timeframe does not relieve Roper Pump from complying with the provisions, purposes, standards, and policies of the Act. Should you have any additional questions or concerns please contact Ms. Elise Chew of the Response and Remediation Program at (404) 463-7555.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

cc: Justin Vickery, EPS  
Ted Peyser, EPS  
File: VRP – Roper Pump Company #10901