



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

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April 16, 2019

Roper Pump Company
c/o Mr. Joe Renzetti, President
3475 Old Maysville Road
Commerce, GA 30529

Subject: Semi-annual VRP 7th Progress Report
Roper Pump Company (HSI 10901)
Commerce, Jackson County, Georgia

Dear Mr. Renzetti:

The Georgia Environmental Protection Division (EPD) has reviewed the Wenck Associates, Inc. Voluntary Remediation Program (VRP) 7th Progress Report (the Progress Report), received November 2, 2018, for the Roper Pump Company (Roper), in Commerce, Jackson County, Georgia. The Progress Report includes a downgradient property evaluation and a description of corrective action activities implemented to address a release to the Qualifying Property. EPD has the following comments:

1. At present, EPD does not agree that downgradient impacts at MW-17 are unrelated to the Roper Pump Company release. Additional lines of evidence, to potentially include soil or groundwater sampling near MW-17, would be needed to support a conclusion of separate sources.
2. Based on the cross-sections provided in the Progress Report and historical boring logs for MW-15D, EPD disagrees that lateral delineation is complete. Progress reports have indicated that MW-15D is bedrock well, however a review of the monitoring well logs indicates that the monitoring well is screened within partially weathered rock (PWR). Please install additional monitoring wells, as needed, downgradient of MW-15D to complete lateral delineation as required by the VRP Act.
3. COC results from several Qualifying Property monitoring wells have shown increasing trends (e.g., MW-7, MW-15D, MW-22). Chemical injections can modify groundwater flow conditions and alter existing COC migration pathways. Where these trends are observed, the completeness of lateral delineation may need to be re-evaluated. For example, a lateral delineation well may be necessary side-gradient of MW-22.
4. When evaluating the effectiveness of ongoing remedial actions, please ensure that complete biotransformation of tetrachloroethylene to ethene is taking place. While recent monitoring results have detected vinyl chloride at a few locations affected by injection activities, vinyl chloride is generally absent across the site. Several aquifer conditions can slow the biotransformation of cis-1,2-dichloroethene to vinyl chloride (i.e., DCE/VC stall). To ensure

that complete biotransformation is occurring, EPD recommends including methane, ethane, and ethene analysis with future groundwater sampling results.

5. Recent progress reports have not included hexavalent chromium results and analysis. In the next VRP submittal, please include any additional chromium results, as needed, to demonstrate delineation and compliance with the VRP Act.

The above-listed comments, in addition to those listed in historical comment letters, must be addressed to EPD's satisfaction to demonstrate compliance with provisions, purposes, standards, and policies of the VRP Act. Please respond to the above as part of the next VRP submittal. If you have any questions, please contact Michael Smilley at 404-463-0530.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

c: Katie Ross, P.G. (via email)

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