

February 5, 2018

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

Re: Semi-Annual VRP Progress Report, Oct. 2017
Roper Pump Company, HSI # 10901
Commerce, Jackson County

Dear Mr. Renzetti:

The Environmental Protection Division (EPD) is in receipt of the October 31, 2017 VRP Progress Report (Report) #5, and Response to Comments – EPD Comment Letter Dated June 19, 2017, for the Roper Pump Company (Roper), in Commerce, Jackson County. After completing a review of this report and response letter, EPD has prepared the following comments:

- 1) MW-17 was not sampled in 2017, complicating any explanation of the fluctuation in tetrachloroethene (PCE) and trichloroethene (TCE) values recently found along the line of wells consisting of MW-13D, MW-15D, MW-8, and MW-17. Roper's response to EPD's June 19, 2017 Comment # 1(b)(ii) is, therefore, insufficient. Please include MW-17 in all future sampling events, and address why this well, seemingly outside of the main plume, has high PCE and TCE concentrations.
- 2) Section 3.2 of the Progress Report outlines the Chemical Parameter Stabilization Criteria used during groundwater sampling. Please be aware that the outlined criteria used are not in accordance with the April 2017 USEPA Region 4 SESD Groundwater Sampling Procedure SESDPROC-301-R4, and ensure future field sampling is performed consistent with Section 3.3 of that procedure.
- 3) Roper provided updated cross sections in the Progress Report, however, continued to use projected rather than actual data. Please update the cross sections to use actual data.

EPD has the following comments regarding Roper's Response to Comments:

- a) In its response to EPD's June 2017 Comment #5, regarding the 92,000 µg/m³ sub-slab sample vapor detection of benzene at VI-4, Roper states "the elevated concentration of benzene in subslab soil gas are likely related to products containing benzene that are used inside the building." EPD notes that Roper provides no new information, such as indoor air sampling, to support this position. Roper also "believes it has satisfied the VRP requirements related to benzene and further work on benzene is not needed." Since there is a documented release of benzene in groundwater and no supported explanation for the VI-4 vapor sample results, EPD does not concur that benzene can be eliminated from the VI pathway and that further evaluation is needed.

- b) In its response to EPD's June 2017 Comment #6, Roper indicates it has satisfied the VRP requirements related to hexavalent chromium. EPD will defer concurrence with this statement until receipt of the final CSR and the accompanying certification of compliance for hexavalent chromium by Roper.

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. Please provide responses to the above listed comments as part of the next scheduled Progress Report submittal. If you should have any questions regarding this matter or if you desire to have a meeting following receipt of these comments, please call Tom Brodell of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Adam Hayes <ahayes@wenck.com>

File: HSI # 10901, File ID: 222-0034

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