

September 1, 2017

**VIA U.S. MAIL & EMAIL**

United Technologies Corporation  
c/o Ms. Beth Lang, Remediation Manager  
5469 Jacobs Drive  
Holly, Michigan 48442

Re: VRP Semi-Annual Progress Report #02 dated June 29, 2016  
VRP Semi-Annual Progress Report #03/Annual Groundwater Monitoring Report dated  
December 22, 2016  
VRP Semi-Annual Progress Report #04 dated June 30, 2017  
Former United Technologies Automotive Site - HSI Site #10543  
1884 Warrenton Highway, McDuffie County, Thomson, Georgia  
Tax Parcel ID#: 00200056

Dear Ms. Lang:

The Georgia Environmental Protection Division (EPD) has reviewed the referenced Voluntary Remediation Program (VRP) Progress Reports (PRs), that were submitted by AECOM, on behalf of United Technologies, Corporation (UTC), pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, *et. seq.* EPD has the following comments, which should be addressed in accordance with the Act:

1. EPD concurs with AECOM's request presented in Progress Report #4 to defer soil-gas sampling while the scope of soil-gas sampling is being re-evaluated, pending evaluation of the results of the June 2017 groundwater sampling event. In addition, EPD has reviewed AECOM's soil gas sampling plan in Progress Report #2. AECOM noted that due to access limitations within the active facility and potential background contribution from unrelated industrial activities within the facility, it would not be recommended or practical to collect air data inside. The plan proposes that surface emission flux monitoring in lieu of soil-gas sampling be conducted outside of the western edge of the building. EPD supports the recommendation to not collect indoor air samples at this time; however, EPD does not recommend the use of surface emission flux monitoring if alternate methods are available. When developing the revised soil-gas sampling scope, please note that EPD would prefer that interior sub-slab soil gas or exterior subsurface soil gas samples be collected in close proximity to the exterior building foundation below the depth of foundation footers be proposed if feasible.
2. As reported in Progress Report #2, an attempt was made during the June 2016 sampling event to locate wells M-1R, M-12, and M-12R and none of the wells were found. However, Section 2.0 of the subsequent 2016 Annual Monitoring Report indicates that M-1R was located, but observed to be destroyed and could not be sampled. Please clarify the condition of M-1R. Considering the well was located at the surface, if possible, the well should be properly abandoned by over-drilling and backfilling with grout in accordance with EPA SESD Region 4 Guidance *SESDGUID-101-R1*,

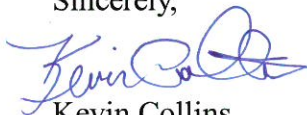
*Design and Installation of Monitoring Wells*, January 29, 2013. EPD concurs with AECOM's interpretation that based upon additional evaluation of groundwater flow direction, wells M-1R, M-12, and M-12R appear to be side-gradient of the source area and that M-4 serves as an appropriate downgradient well that separates the source area from the eastern side of the site.

3. Section 2.1 of the 2016 Groundwater Monitoring Report indicates that well repairs were made to some wells during the June 2016 monitoring event and future repairs will be made to other wells. The field logbook (Appendix A) includes reference to many wells with damaged or missing components. Please indicate if the remaining well repairs were completed during the June 2017 sampling event such that the integrity of the wells has been restored.
4. The trend of increasing TCE concentrations in co-located source area wells M-14D/M-17 is noted and EPD agrees with the recommendation presented in the 2016 Groundwater Monitoring Report for additional characterization to achieve vertical delineation and will hold any further comments until receipt of the June 2017 sampling event results.
5. Groundwater flow direction from the source area has varied from east to southeast over time. Considering that groundwater flow has most recently been toward the southeast in the direction of M-13, as illustrated on the 2015-2016 potentiometric surface maps, EPD requests that M-13 be included as an additional POD well.
6. Section 1.1 of the 2016 Groundwater Monitoring Report indicates that the Site fencing and building footprint will be re-surveyed in 2017, as requested by EPD. Please provide the status of the resurvey.

The above 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 UTC. However, failure of EPD to respond to a submittal within any timeframe does not relieve UTC from complying with the provisions, purposes, standards, and policies of the Act. EPD is in the process of reviewing the revised draft Uniform Environmental Covenants (UEC) received from UTC June 13, 2017 and our response is forthcoming.

EPD anticipates receipt of the next Semi-Annual Progress Report by December 31, 2017. Should you have any question or concerns regarding this submittal, please contact Mr. Robert Marbury, P.G. of the Response and Remediation Program at (404) 463-7507.

Sincerely,



Kevin Collins

Response Development Unit Manager  
Response and Remediation Program

cc: Matthew Panciera – AECOM (via email)

File: 210-0019 (HSI#10543 – VRP)

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