GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

February 20, 2018

Via U.S. Mail
And Email: dboatright@murata.com

Murata Erie NA, Inc.
c/o Donnie Boatright, Corporate QA Manager
2200 Lake Park Drive
Smyrna, Georgia 30080

Subject: EPD Comments
Voluntary Investigation and Remediation Plan
MENA Rockmart Facility, HSI Site No. 10771
308 Prospect Road, Rockmart, Polk County, GA

Dear Mr. Boatright:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated March 31, 2017 that was submitted by Murata Erie NA, Inc. (Murata) as an application for enrollment in the Voluntary Remediation Program (VRP) for the referenced site. EPD has the following comments:

1. In addition to the 308 Prospect Road property owned by Murata, the 457 and 515 Industrial Drive properties not owned by Murata were proposed as additional qualifying properties for enrollment in the VRP. However, EPD understands that 457 and 515 Industrial Drive have recently not been accessible. In order to enroll these properties in the VRP, Murata must have express permission to enter the properties to perform corrective action.
2. Based on historical sampling results, 1,4-dioxane should be considered as a potential constituent of concern for soil and groundwater. Please collect soil and groundwater samples in locations representative of where the substance would most likely be encountered (e.g., in soil near the water table and in groundwater at the source and the leading edge of the plume). Samples should be analyzed for 1,4-dioxane using EPA Method 8260 with selective ion monitoring (SIM) to obtain an appropriate detection limit.
3. Figure 3-4 (Murata Electronics – Site Conceptual Model): It appears that the primary sources column, on the far left of the figure, was labeled incorrectly with another site's name (M&J Solvents) in the Atlanta, Georgia area. Please revise this figure accordingly in future submittals.
4. Table 3-1 (Monitoring Well Groundwater Elevations): Please include the depth interval of the open section of monitoring wells MW-12 and MW-28, in the space for the "screen interval" along with the "open hole" label shown, to indicate the interval monitored by the well.

5. Table 3-2 (Groundwater VOC Concentrations): In future versions of Table 3-2 (Groundwater VOC Concentrations), please identify the sample collection method [e.g., permeable diffusion bag (PDB) samplers, traditional volumetric purging and soda straw collection method, etc.].
6. Cross-Section(s): A minimum of two cross-sections are necessary to depict the surficial and subsurface conditions at the site. Please provide an additional cross-section that extends (left to right) from MW-7 (SE corner of the Murata property) through MW-26, MW-22, MW-12/13, MW-23, MW-27, MW-A-3, MW-A-1, and MW-15.
    a. Please tabulate the most recent groundwater analytical results on the cross-sections immediately adjacent to the screened interval where they were collected.
    b. Please include all soil borings along the lines of cross-sections. Soil sampling intervals should be clearly depicted and associated analytical results tabulated. Soil analytical results should include sample acquisition dates and collection depths and should be clearly identified as pre- or post-remediation samples.
    c. Please depict major above ground structures, especially structures that were the source of the contaminant release(s), ground surface type (pavement, bare earth, etc.) along with known subsurface features associated with utilities and remediation system components.
7. In Appendix B, the groundwater Type 1 – 4 Risk Reduction Standards (RRS) and the soil Type 1 – 3 RRS are acceptable for use at the site. For the soil Type 4 RRS, please clarify the input values used for the mass limit leaching calculations and provide a justification for the use of the values.
8. EPD has the following comments regarding groundwater purging and sampling methods used during the 2016 groundwater monitoring event based on a review of the single groundwater sampling field log provided in Appendix D of the VIRP.
    a. The low-flow purging method, as described in the EPA Region 4 SESD Groundwater Sampling operating procedure dated April 26, 2017, involves maintaining the depth to water during the purge. It appears that field personnel were unable to do so for MW-7 as even the last three recorded depth to water measurements varied more than +0.3 ft. In the future, if field personnel are unable to stabilize groundwater measurements during purging, they should use the Traditional Multiple-Volume Purge method described in Section 3.4 of the referenced SOPs by pulling the pump intake to a depth just below the water table and lowering it as necessary to continue pumping water.
    b. The use of Low Density Polyethylene (LDPE) return tubing and pump bladder for collection of groundwater samples for volatile organic compound (VOC) analysis is not consistent with the referenced EPA SOPs and should not be used to demonstrate compliance with Type 1 – 4 RRS. Groundwater samples collected for said purposes should be collected using Teflon® or Teflon®-lined return tubing, and bladders, as recommended in the referenced EPA SOPs.
9. Depth to groundwater should be measured in all existing monitoring wells during future groundwater monitoring events regardless of whether they are sampled.

10. Murata intends to decommission several groundwater monitoring wells as summarized on Table 4-1. EPD concurs with the plan to decommission monitoring wells that are consistently dry and cannot be sampled or gauged for water levels. Prior to well decommissioning, please conduct a comprehensive groundwater monitoring event in which all monitoring wells (not dry) are purged and sampled for VOC analysis using either the traditional or low-flow purge methods referenced above. Groundwater samples collected in the vicinity of past in-situ chemical oxidation injections should also be analyzed for the eight RCRA metals. Well decommissioning plans should then be adjusted based on the results of the comprehensive monitoring event if necessary.
11. Efforts should be made to locate and properly decommission monitoring wells assumed to have been destroyed or buried on adjacent properties.
12. The draft Uniform Environmental Covenant (UEC) should be finalized once the activity and use limitations have been finalized. EPD will review the updated UEC at that time.
13. The vapor intrusion pathway should be evaluated for buildings within 100 feet of VOC contamination in soil or groundwater. For guidance in conducting the evaluation, please refer to the EPA *Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air* dated June 2015.

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 Murata. However, failure of EPD to respond to a submittal within any timeframe does not relieve Murata from complying with the provisions, purposes, standards, and policies of the Act. If you have any questions, please contact Gordon Terhune of the Response and Remediation Program at (404) 657-8600.

Sincerely,

Jason Metzger
Program Manager
Response and Remediation Program

c: Hunter Sartain, ERM (via email: hunter.sartain@erm.com)
Nic Vrey, ERM (via email: nic.vrey@erm.com)

File: 233-0054 (VRP)
S:\RDRIVE\LARRYK\Murata Electric\VRP\2018-2-20 vrp application comments.docx