

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

November 22, 2013

VIA E-MAIL AND REGULAR MAIL

Rexmet Corporation
c/o Mr. John W. Rex
P.O. Box 270
Landsdale, PA 19446

Re: Voluntary Remediation Plan and Application, July 30, 2013
Operation & Maintenance Report, May 2012
Carolina Commercial Heat Treat Property, HSI # 10341
1690 Highway 138
Conyers, Rockdale County, Georgia
Tax Parcel 069001003L

Dear Mr. Rex:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated July 30, 2013, submitted for the above referenced property pursuant to the Georgia Voluntary Remediation Program Act (the Act). As part of the VIRP review, EPD also reviewed the May 2012 Operations & Maintenance Report. EPD offers the following comments which should be addressed in subsequent progress reporting:

Conceptual Site Model

1. Groundwater contamination exceeding risk reduction standards is known to exist on several downgradient properties, including, but not necessarily limited to, tax parcels 0700010001, 0710010003, and 071001002D. In accordance with our VIRP approval letter, Rexmet Corporation must apply to EPD by May 22, 2014 to include all known impacted properties as qualifying properties under the Act or notify EPD by said date that the known impacted properties will not be included in the program. In the event that no other properties are entered into the program, the Point of Exposure (POE) must be located at the downgradient property line of the CCHT property on the basis that impacted non-qualifying properties will be addressed within the HSRA regulatory framework, whereby all groundwater is considered potential drinking water (i.e., a theoretical POE). Assuming the properties are included in the program and UECs are filed, the UECs must restrict groundwater usage, and further development or residential use of the properties without vapor intrusion analysis.
2. Although the VIRP proposes two years of monitoring to demonstrate compliance with the Act, further monitoring and/or fate and transport modeling may be necessary based on the groundwater and surface water sampling results.
3. Figure 5 shows air sparge (AS) and soil vapor extraction (SVE) points on the cross section. The cross section location map does not show the location of any of the points used. Please provide the location of the former AS/SVE system points on a figure in plan view.

4. The discussion on the conceptual site model is not described very clearly and should be further substantiated with details on the distribution of PCE in the saprolite relative to depth and potential rebound effects with the AS/SVE system off.
5. An additional cross section perpendicular to A-A', from MW-14 to MW-29D, would be helpful in confirming the CSM. Revised cross sections should be submitted as part of an updated CSM in each future VRP progress report.
6. Please provide a map that summarizes the water well survey conducted and shows the location of the Accurate Transmission Shop well.

Investigation and Remediation Plan

7. Since PCE surface water screening criteria are higher than the current Georgia In Stream Water Quality Standards (GIWQS) as provided in Section 391-3-6-.03(5) of the Georgia Water Quality Control Act, the remedial criteria for surface water impacts is the GIWQS (3.3 ug/L). Consequently, surface water samples should be collected in conjunction with the semi-annual groundwater monitoring events to determine if additional action is warranted. Please relocate SW-02 to be more representative of the water quality in the retention pond at the intersection with the plume axis.
8. Surface Water Clean Up Criteria - Using the intake rates provided on Tables F1a and F1b, EPD could not replicate the risk-based concentrations provided on Tables F6a and F6b. Additionally, Table F5 provides toxicity values for trichloroethene and not PCE. These criteria may need to be resubmitted for approval in the future depending on results from the surface water sampling.
9. No field logs were provided with the report to show that samples from MW-27D, MW-28D, and MW-29D were collected as described in the section titled "Groundwater Sampling Methodology" of the May 2012 O&M Report. This data is needed to confirm the wells were sampled according to EPA guidance documents. In all future reports, please provide field sampling logs for each well where a sample is collected.
10. Please provide laboratory reports and additional detail on the methods used for sampling temporary wells TW-12-1 through 12-4, TW-13-1, TW13-2, and MW-29D.
11. MW-28D was sampled using a bailer. Please note that the use of bailers for purging and sampling monitoring wells is discouraged by the Region 4 EPA Science and Ecosystem Support Division Operating Procedures. For future groundwater sampling at the site, please use a low-flow method described in *SESDPROC-301-R3* (effective March 6, 2013).

Figures and Tables

12. The laboratory detection limit for vinyl chloride was reported in recent laboratory reports at 5 ug/L. This should be 2 ug/L for all future analyses for vinyl chloride.

13. A table summarizing well construction details is not provided in the reports for the monitoring wells on the site. Please provide a table summarizing well construction details (total depth, screen length, etc.) for all wells on-site.
14. The last two data points in the trend chart for MW-25D in Appendix B are incorrect and should be corrected in future reporting.

Rexmet Corporation must address these comments 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 Rexmet Corporation. However, failure of EPD to respond to a submittal within any timeframe does not relieve Rexmet Corporation from complying with the provisions, purposes, standards and policies of the Act.

If you have any questions regarding this matter, please contact Robin Futch, PG, PMP of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Keith Cole, Environ (w/o enclosure)

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