

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 21, 2017

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

Subject:

Annual Groundwater Monitoring Report, December 11, 2016

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 Annual Groundwater Monitoring Report prepared by Ramboll Environ, on the behalf of Rexmet Corporation, for the above referenced site. EPD offers the following comments:

- 1. The above referenced report did not include any updates on the progress of developing an environmental covenant for the O'Reilly Auto Parts property parcel. EPD understands that Rexmet may be encountering difficulties in executing the institutional controls that are part the planned corrective action for the site property. Should Rexmet continue to encounter difficulties in implementing the institutional controls that are part of the planned corrective action, please contact EPD directly to discuss Rexmet's alternate options for compliance. In addition, please note that any planned institutional controls for the site property, or associated properties with groundwater impacts, can be submitted in draft form to EPD prior to the submittal of a Compliance Status Report.
- 2. Based on the elevated concentrations of tetrachloroethene in monitoring well MW-15, please evaluate the potential vapor intrusion exposure risk for the O'Reilly Auto Parts property. EPD recommends using a multiple lines of evidence evaluation approach in accordance with the U.S. EPA 2015 Technical Guidance for Assessing and Mitigating the Vapor Intrusion Pathway from Subslab Vapor Sources to Indoor Air.
- 3. Table 2 does not list any applicable Risk Reduction Standards (RRS), per the Rules for Hazardous Site Response, which are the applicable standard for confirming soil and/or groundwater compliance. In future reporting, please post RRS that have been reviewed and approved by EPD for use as the applicable cleanup standard on the tables.

Rexmet Corporation February 21, 2017 Page 2 of 2

EPD anticipates receipt of the next Annual Groundwater Monitoring Report by December 15, 2017. If you have any questions regarding this matter, please contact Robin Futch, PG, PMP of the Response and Remediation Program at 404-656-3851.

Sincerely,

Kevin Collins Unit Coordinator

Response and Remediation Program

c:

Keith Cole, Environ (w/o enclosure)

File: HSI #10341

S:\RDRIVE\RFUTCH\SITES\HSI SITES\10341 - Carolina Commercial Heat Treat\2016 Annual GW Monitoring Report Comments.doc