

November 23, 2016

C&D Technologies, Inc.
c/o Mr. Walter E. Kozlowski
Manager – Environment, Health, & Safety
P.O. Box 3053
Blue Bell, Pennsylvania 19422-0858

Subject: Progress Report 1 dated June 22, 2016
C&D Technologies, Inc. Site (HSI 10734)
1835 Rockdale Industrial Boulevard
Conyers, Rockdale County, Georgia

Dear Mr. Kozlowski:

The Georgia Environmental Protection Division (EPD) has reviewed the Progress Report 1 dated June 22, 2016 for the referenced site. This report was submitted in accordance with the Voluntary Remediation Program Application approval letter from EPD dated December 23, 2015. EPD has the following comments:

Groundwater Monitoring

1. When it is impossible to use either the 3 to 5 volume purge method or the low flow/low purge method as specified in Section 3.2.1 of the USEPA Region 4 SESD Groundwater Sampling Operating Procedure dated March 6, 2013 (SESDPROC-301-R3) as a result of slow recharge, the well should be purged dry. Well purging does not have to be performed at a very low rate, but should not be pumped at a very high rate either. The pump intake should be placed near the surface of the water interface and lowered down as the water level goes down. For those hard to purge wells, purging should be done at the beginning of the day and the sample should be collected as soon as possible when there is sufficient recharge water to draw a sample. Groundwater samples must be taken before the end of the day. A Teflon closed-top bailer is allowed to expedite the collection of the groundwater sample.

If the well is deep (greater than 20 feet) and there is significant drawdown, a peristaltic pump should not be used since a peristaltic pump's capacity to lift the column of water is limited. A submersible or bladder pump should be used. It is not permissible to purge wells using a peristaltic pump until the water level drops to the capacity of the peristaltic pump and then draw a sample without purging at least 3 to 5 well volumes.

2. As far as placement of the pump intake, for low flow/low purge methods, it should be placed in the middle of the screened interval if the screened interval is submerged. If you are using the traditional 3 to 5 volume purge, the water should be drawn from the top of the water column. For most of the wells where the screened interval is submerged, it

appears that water is being drawn from the center of the screened interval, which is the correct method. For some wells where the screened interval is not submerged (i.e., MW-10 and MW-11), it appears that the pump intake was closer to the top of the water interface. For CD-03, it appears that the pump intake was at the bottom of the well. In these situations, the intake should be at mid-depth.

The above comments 1 and 2 were transmitted to Craig Bernhoft in an email from Larry Kloet of EPD dated August 29, 2016.

Noted Errors in Progress Report

3. In Figure 4, it is noted that the TCE concentration of monitoring well MW-3 is 1.3 ug/L. The correct TCE concentration should be 50.6 ug/L to be consistent with Table 1 and the laboratory reports.

Recommendations for upcoming monitoring

4. MW-3 should be monitored for VOCs.

MW-29 SBR should be monitored for VOCs since it appears that the TCE/PCE concentration may be increasing.

MW-20 should be monitored for lead.

5. In the next semi-annual report, please submit cross-sections showing delineation of VOCs and lead in groundwater. This will also be necessary in the VRP-CSR. In addition, a figure delineating the horizontal extent of lead needs to be included.
6. To define the extent of delineation of VOCs, a shallow bedrock well should be established just to the north and east of MW-8 and MW-8 SBR.

Above comments 4 through 6 were transmitted to Craig Bernhoft in an email from Larry Kloet of EPD dated September 19, 2016.

Other Comments

7. EPD does not consider vertical or horizontal delineation to the north as being complete until wells MW-16 and MW-27 SBR on the Pittman Property have been monitored. As referenced in the VRP Program Activities schedule shown in Appendix D of Progress Report 1, this is expected to be accomplished no later than December 22, 2017.
8. EPD has also reviewed the warranty deed and tax parcel information for qualifying properties and the milestone schedule submitted in your letter dated January 28, 2016. EPD notes that there are still corrections that need to be made on the list of "Additional Qualifying Properties" form, which was submitted in the original VRP Application:
 - a. The warranty deed and tax parcel information for the Robert Pattillo Properties (Tax Parcels 0220010024 and 0220010022) appears to be complete. As shown on

the Certificate of Fact dated July 6, 1998 recorded in Rockdale County Book 1565 page 175, the owner of both of these tracts should be "Robert Pattillo Properties, Inc." The owner listed on the "Additional Qualifying Properties" form does not match the deed record.

- b. The warranty deed and tax parcel information for the Frey-Moss Structures Parcel appears to be complete. Information on the "Additional Qualifying Properties" form needs to be corrected. The Tax Parcel address should be listed as 1765 NW Rockdale Industrial Blvd. The correct parcel number should be listed as 0220010027.

A revised copy of the "Additional Qualifying Properties" form should be completed listing the Robert Pattillo Properties, Inc., the Frey-Moss Structures, Inc., and the Latex Construction Company parcels. Corrections as noted above should be made on the form. The Glenn Burnie Ventures parcel should be deleted.

The above comments, except as noted otherwise, should be resolved in the next semiannual Progress Report, which is due no later than December 22, 2016. EPD has adopted a standard Document Submittal Form that is to be included with all compact discs. This form can be accessed at [https://epd.georgia.gov/compliance-status-report-391-3-19-.06\(3\)](https://epd.georgia.gov/compliance-status-report-391-3-19-.06(3)).

If you have any questions, please contact Mr. Larry Kloet of the Response and Remediation Program at 404-463-7505.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

c: Craig Bernhoft, AECOM (via email)

File: File ID 251-0012 (VRP)