

June 28, 2018

Carpenter Technology Corporation  
c/o Mr. Sean McGowan  
Manager, Environmental Affairs  
P.O. Box 14662  
Reading, Pennsylvania 19612-4662

**VIA FIRST CLASS MAIL AND EMAIL**

Re: EPD Comments on VRP Semiannual Reports 5, 6, 7, and 8  
General Time Corporation, HSI Site Number 10355  
Athens, Georgia; Clarke County

Dear Mr. McGowan:

The Georgia Environmental Protection Division (EPD) is in receipt of Voluntary Remediation Program (VRP) semiannual reports 5, 6, 7, and 8 from Carpenter Technology Corporation (Carpenter) for the General Time facility, HSI site number 10355. These documents were submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). Our comments are provided below.

- 1) Any risk reduction standard (RRS) presented as a remedial goal in a VRP report will require review and approval by EPD's Risk Assessment Unit (RAU). As of the date of this letter, the following Type 1 groundwater RRSs have been approved for the General Time site:
  - a. TCE: 0.005 mg/L
  - b. Vinyl chloride: 0.002 mg/L
  - c. Cis-1,2-DCE: 0.07 mg/L
  - d. Trans-1,2-DCE: 0.1 mg/L (a Type 2 of 0.03 mg/L and a Type 4 of 0.20 mg/L have also been approved for this substance)
  - e. Methylene chloride: 0.005 mg/L

The following Type 1 soil RRSs have been approved for this site:

- f. TCE, 0.5 mg/kg
  - g. Cis-1,2-DCE, 7 mg/kg
  - h. Trans-1,2-DCE, 10 mg/kg
- 2) Regarding the RRS calculations provided in Appendix C of VRP Semiannual Report 5, please resubmit calculations for regulated substances on site that do not have approved RRS values from EPD (see Comment 1 above). Please note that EPD allows use of the US EPA VISL tool for vapor-intrusion screening, but VISL should not be used to calculate groundwater RRSs. Please refer to Section 391-3-19.07 and Appendix III of the *Georgia Rules for Hazardous Site Response* for guidance on calculating RRSs. Please obtain toxicity factors from the latest version of the US EPA Screening Level (SL) Summary Table. Where necessary, obtain input values for specific physical and chemical properties of a substance from the latest version of the US EPA SL Chemical Specific Parameters Table. Both tables can be accessed on the Internet at: <http://www2.epa.gov/risk/risk-based-screening-table-generic-tables>.

- 3) Pursuant to your request in Section 3 of VRP Semiannual Report 5, 1,1-DCA may be removed from the list of required groundwater analytes, due to that substance's history of low detections and non-detections on site.
- 4) Within the body of future reports, please include at least a brief narrative on surface-water-sampling protocol, and on the associated analytical laboratory results.
- 5) The Rapid Bioassessment Report, presented in Appendix D of VRP Semiannual Report 6, is acceptable to EPD. At this time, we will not require further ecological assessment of the wetlands and North Oconee River habitat in the vicinity of the MW-11 well cluster. However, if TCE concentrations in groundwater or surface water increase, or if evidence of stressed ground vegetation, or of stressed aquatic flora or fauna is observed, additional ecological and toxicological assessment may be required.
- 6) EPD notes that groundwater TCE concentrations have increased in MW-2I, and are also high in RW-3. Both of those wells are downgradient of the former cistern and TCE spill area. EPD believes that as lactate injections and other possible remedial alternatives are implemented in the primary source areas inside the former manufacturing building, TCE concentrations in downgradient groundwater, including the relatively high concentrations at MW-2I and RW-3, should decrease over time. However, if groundwater quality in those wells does not improve in a timely fashion, remedial action at those locations may be required.
- 7) On future potentiometric maps, please label contours with the appropriate groundwater elevations. On Figure 3, a potentiometric map in VRP Semiannual Report 8, potentiometric contours were not labeled.
- 8) An application for entry into the Georgia Brownfield Program was recently submitted to EPD for this site. Soil assessment associated with that application indicated that previously undiscovered source material is present beneath the former manufacturing building. The Brownfield investigation may result in additional VRP comments in the future.

Carpenter Technology 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 Carpenter Technology Corporation. However, failure of EPD to respond to a submittal within any timeframe does not relieve Carpenter Technology Corporation from complying with the provisions, purposes, standards, and policies of the Act.

Also, please be aware that this site has been transferred to the newly-formed VRP Unit. If you have any questions, please call David Hayes of the VRP Unit at (404) 657-8600..

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: Mark Miesfeldt, Haley & Aldrich (via email)