

Georgia Department of Natural Resources

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Reply To:
Response and Remediation Program
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Mark Williams, Commissioner
Environmental Protection Division
Judson H. Turner, Director
Land Protection Branch
Mark Smith, Branch Chief

February 24, 2012

VIA EMAIL & REGULAR MAIL

Mr. John Perkins
Director of Environmental Health and Safety
Scott Technologies, Inc.
6600 Congress Avenue
Boca Raton, Florida 33487

Re: April 29, 2011 Voluntary Remediation Plan Application
& November 14, 2011 VRP Application Addendum
Former Automatic Sprinkler Site, HSI #10268
Swainsboro, Emanuel County, GA
Tax Parcel ID S12 005

Dear Mr. Perkins:

The Georgia Environmental Protection Division (EPD) has received the April 29, 2011 Voluntary Remediation Program (VRP) application and November 14, 2011, VRP Application Addendum that have been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by AMEC on behalf of Scott Technologies, Inc. (STI). After completing its review of the application, EPD has noted the following concerns that need to be addressed:

Risk Reduction Standards (RRS):

- 1) Table 2: The Type 3 RRS values need to be segregated into surface & subsurface soil. For Lead, the Type 3 RRS value is incorrect. The correct value is 400mg/kg (please see section 391-3-19-.07(8)(d) of the Rules¹). The soil Type 3 RRS value for Arsenic and Mercury will also need to be revised. Additionally, the groundwater Type 4 RRS for 1,1,2,2-Tetrachloroethane is incorrect. Please revise, remembering to make necessary changes to the C_w term in the leachability calculations in the soil Type 4 RRS derivation.
- 2) Appendix B – Vapor Intrusion: In the toxicity assessment section, it was mentioned that the toxicity values for trans-1,2-Dichloroethylene were used as a surrogate for cis-1,2-Dichloroethylene. Please note that the use of surrogate compounds is prohibited under the Rules, however, any compound without inhalation toxicity values need not be evaluated in the J&E model. Please remove cis-1,2-Dichloroethylene from evaluation in the J&E model. Table B-1: Footnote B indicates that all non-cancer OSWER screening values obtained from the EPA 2002 Draft Vapor Intrusion Guidance document were divided by 10. Please note that this is incorrect and all screening values must remain as they appear in the OSWER document. Please revise.

¹ Rules of Georgia Department of Natural Resources, Environmental Protection Program, Chapter 391-3-19, Hazardous Site Response, 1996.

- 3) Table C-3: Please note that the adult resident inhalation rate of air is $15\text{m}^3/\text{day}$ and not $20\text{m}^3/\text{day}$. Please revise text and calculations.

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

Should you have any question or concerns regarding this site, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 657-0488.

Sincerely,



David Brownlee
Acting Program Manager
Response and Remediation Program

c: Andy Riley, Emanuel County Joint Development Authority
Anita Bucci, Teleflex Incorporated
Cynthia Draper, MACTEC

File: VRP Application 919182852 – Former Automatic Sprinkler Site #10268

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