



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

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

December 20, 2016

Scott Figgie LLC / GSF Management Co. LLC
c/o Stuart Rixman
34407 DuPont Boulevard, Suite 6
Frankfort, Delaware 19945

Re: VRP Progress Report No. 9
Automatic Sprinkler (Former)
Swainsboro, Emanuel County, HSI # 10268

Dear Mr. Rixman:

The Environmental Protection Division (EPD) is in receipt of the August 2016, Voluntary Remediation Program (VRP) Progress Report #9 (the Report) for the Automatic Sprinkler (Former), in Swainsboro, Emanuel County. After completing a review of this report, EPD has the following comment:

- According to the March 2013 USEPA Region 4 SESD Groundwater Sampling Procedure, SESDPROC-301-R3, Section 3.2.2.1.2, when the "Tubing-in-Screened-Interval" or Low Flow Method is used, "there should be only a slight and stable drawdown of the water column after pumping begins. If this condition cannot be met, then one of the other [purgings] methods should be employed." Examining the sampling log for MW-20D indicates that a Low Flow purge was not acceptable for this well.

The above listed comment must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Please provide a response to the above listed comment as part of the next scheduled Progress Report submittal. If you should have any questions regarding this matter, please call Tom Brodell of the Response and Remediation Program at (404) 657-8600.

Sincerely,

David Brownlee
Unit Coordinator
Response and Remediation Program

c: Jack Bareford, Swainsboro-Emanuel County Joint Development Authority
<jbareford@goemanuel.org>
Anita Bucci, Kongsberg Automotive <anita.bucci@ka-group.com>
Gregory Wrenn, AMEC Foster Wheeler <greg.wrenn@amecfw.com>

File: HSI # 10268

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