

December 21, 2018

VIA U.S. MAIL & EMAIL

Rheem Manufacturing Company
c/o Mr. Gregory Henry
1100 Abernathy Road, NE, Suite 1400
Atlanta, GA 30328

Subject: Extension Request for CSR Submittal dated November 28, 2018
9th VRP Progress Report dated May 30, 2018
Water Well Survey dated March 30, 2018
Rheem Manufacturing Company
138 Roberson Mill Road, Baldwin County, Milledgeville, Georgia
Tax Parcel ID#: M52-001

Dear Mr. Henry:

The Georgia Environmental Protection Division (EPD) has reviewed the referenced documents that were submitted by Environmental Planning Specialists, Inc. (EPS) on behalf of Rheem Manufacturing Company (Rheem), pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, *et. seq.* and Consent Order EPD-VRP-007. EPD has the following comments related to the progress report:

1. In Section 7.3.3 EPS states that the plume has reached steady-state conditions based on concentration over distance trend charts. Please provide these trend charts in the Compliance Status Report (CSR).
2. Groundwater elevation data for on- and off-property wells, as presented in Figure 7 of the progress report, presents a comprehensive illustration of groundwater flow from the source area to the downgradient wells. However, EPD requests that the potentiometric surface map include labeled potentiometric surface contours.
3. Table 2 shows the maximum concentration of TCE detected in subsurface soil (SB, > 2 feet) at 110 mg/kg. However, Table 3 and the ProUCL Attachment provided in Appendix E, both of which are representative of post-SVE samples from 0-10 feet, show a maximum TCE concentration of 55 mg/kg. Please clarify the maximum remaining soil concentrations in the intervals of 0 – 2 feet and 2 – 10 feet and identify any locations where discrete samples exceeded applicable site-specific Type 4 Risk Reduction Standards (before area averaging methods were applied).
4. Please include a figure in the CSR showing the off-property soil gas sampling locations.

5. Risk Assessment Comment: Soil Exposure Assessment for Construction Workers (Tables E6 and E7) - Using the acceptable site-specific exposure parameter inputs provided at the bottom of Tables E6 and E7, EPD was unable to replicate the trichloroethene risk-based results presented for the construction worker. The tables list a cancer risk-based soil concentration of 2,628 mg/kg and non-cancer risk-based soil concentration of 37.5 mg/kg for the construction worker, but EPD derived cancer and non-cancer risk-based concentrations of 3,227 and 41 mg/kg, respectively. EPD was unable to pinpoint the source of the discrepancy. However, given that the risk-based values calculated by the Risk Assessment Unit for the construction worker exposure scenario are less restrictive than those presented in the report, EPD does not require recalculation of the proposed values.

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 approves the extension request for submittal of a CSR, with a revised due date of January 31, 2019. If you have any questions, please contact Ms. Nicole Vermillion of the Response and Remediation Program at (404) 232-7891.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

cc: Andrea Rimer – Troutman Sanders (via email)

Justin Vickery – EPS, Inc. (via email)

File: 213-0019 (VRP)