



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

March 12, 2018

Via US MAIL and EMAIL

Ingersoll-Rand Company
c/o Mr. Mike Goldstein, Global Remediation and Transaction Manager
800-E Beaty Street
Davidson, NC 28036

Re: 1) Responses to the November 30, 2017 EPD Comment Letter and 2) Post-VRP CSR Monitoring Report, both dated January 31, 2018
Thermo King Corporation Site, Louisville, Jefferson County, Georgia
HSI Site No. 10702, Tax Parcel 0090-024

Dear Mr. Goldstein:

The Georgia Environmental Protection Division (EPD) has reviewed the subject submittals prepared and submitted by Wood Group, PLC (Wood), on behalf of Thermo King Corporation (Thermo King)/Ingersoll-Rand Company (Ingersoll-Rand), and has the following comments based on the Georgia Voluntary Remediation Act (the Act) and the Georgia Hazardous Site Response Rules (the Rules) as they may apply.

Responses to the November 30, 2017 EPD Comments:

1. **EPD Comment #1.a.:** EPD is deferring evaluation of the revised compliance status certification statement(s) for soil until the soil investigation referenced in Comment #2 below has been completed and a revised Operation and Maintenance (O&M) Plan for proposed engineering controls has been submitted and approved by EPD. The groundwater compliance status certification statement(s) is acceptable.
2. **EPD Comment #6:** Wood's response to this EPD Comment, "*proposes to conduct additional soil sampling inside the building to the north, west, and south of the former degreaser locations, areas where soil constituent concentrations exceed Type 1 to 4 RRSs.*" EPD concurs with Ingersoll-Rand's decision to conduct an additional soil investigation. *However:*
 - a. The current proposed area of soil investigation does not address the detection of trichloroethene (TCE) in soil at concentrations exceeding the Type 1 through 4 RRS near the former south settling pond, at boring SB-112 [18-19 ft below ground surface (bgs)]. In addition, there are insufficient analytical results for 1,4-dioxane to verify compliance with applicable RRS in the same area. This is because: 1) the reported laboratory "detection limit" for 1,4-dioxane in the referenced SB-112 soil sample is greater than the applicable Type 1

through 4 RRS, and 2) many soil samples collected near the SB-112 location were not analyzed for 1,4-dioxane.

- b. A milestone schedule for conducting the proposed investigation was not provided in the responses to EPD comments. Based on a conversation between Ms. Carolyn Daniels of EPD and Ms. Rhonda Quinn of Wood on March 6, 2018, it is EPD's understanding that Ingersoll-Rand and Wood are awaiting EPD's comments regarding the subject submittals before proceeding with the proposed soil investigation. Please contact Ms. Carolyn L. Daniels, P.G. of my office at your earliest convenience to arrange a time for a face-to-face meeting or conference call for this purpose. A short written work-plan with large scale figures showing close up views of the areas to be investigated should be submitted to EPD via email at least one week before the proposed meeting or conference call. The figures should clearly identify:
- Existing site features (building walls, extent of concrete building slabs and/or asphalt/concrete pavement, etc.),
 - Potential source locations such as former degreaser locations, settling ponds, etc.,
 - Historical soil sampling locations with analytical results for 1,4-dioxane and TCE posted immediately adjacent to their associated sampling locations, and
 - Proposed soil sampling locations.
- i. *Please note when selecting soil sampling locations for the proposed investigation:* Non-detections of 1,4-dioxane and/or TCE in soil that are based on laboratory reporting limits greater than the applicable Type 1 through 4 RRS are not acceptable for determining the presence of the referenced substances, *nor* may they be used to delineate the extent of the areas where compliance with Type 5 RRS is to be maintained through the use of engineering controls. EPD noted that the following soil samples, based on a preliminary review of Figures 2.3-1A and -1B submitted with your responses to EPD comments, had elevated laboratory reporting limits greater than applicable Type 1-4 RRSs:
- 1,4-Dioxane: SO-AOC3-2 (0-2 ft and 8-10 ft), HA-6 (1.2-2.0 ft), HA-7 (3-5 ft), Kd-8 (9 ft), Kd-9 (7, 9, and 10 ft), Kd-10 (3, 9, and 15 ft), Kd-11 (4 and 6 ft), and SB-112 (18-19 ft); and
 - TCE: HA-2 (0.35 – 2.1 ft), Kd-1 (2 ft), and Kd-11 (4 ft)
- ii. EPD recommends that the proposed investigation be completed in sufficient time to *submit a revised O&M Plan for EPD review by no later than June 29, 2018.*
3. **EPD Comment #6c:** The response to this EPD comment is acceptable. Please ensure that monitoring well decommissioning and/or inspection activities are documented in future post-CSR monitoring/O&M reports that cover the time period(s) during which said activities are conducted.
4. **EPD Comment #7:** EPD has not received a notification of intent to cancel the existing Financial Assurance instrument referenced in Wood's response to the original EPD Comment. The date for renewal of the existing instrument is May 5, 2018. The FA instrument itself states that said notification of intent to cancel should be provided to the Director no less than 120 days before the stated automatic renewal date. Please inform EPD of the status of the cancellation or renewal of the existing FA instrument.

Post-VRP CSR Monitoring Report

5. The inspection area for the engineering control used to maintain soil compliance with Type 5 RRS for 1,4-dioxane and TCE is not supported by existing soil analytical results (see Comment #2 above).

Please contact Carolyn L. Daniels, P.G. of my office *via* telephone at 404-657-8646 or email at carolyn.daniels@dnr.ga.gov if you have any questions regarding these comments.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Rhonda Quinn and A. David Alcott, Wood Group, PLC (email)

File: 199-0010 (VRP)

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