



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

May 24, 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: April 20, 2018 Responses to March 12, 2018 EPD Comments and Soil Investigation Work Plan
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 submittal prepared and submitted by Wood Group, PLC (Wood), on behalf of Thermo King Corporation (Thermo King)/Ingersoll-Rand Company (Ingersoll-Rand). Based on said review, EPD has determined that the responses to EPD Comments #1, 3, 4, and 5 in the March 12, 2018 are acceptable as provided. However, EPD has the following comments regarding the response to EPD Comment #2 of the March 2018 letter and the associated portions of the Soil Investigation Work Plan in Appendix A of the subject submittal:

1. **Soil near South Settling Pond:** Please note that 1,4-dioxane was used as a stabilizer for trichlorethene (TCE) product as well as for trichloroethane (TCA). Therefore, EPD considers 1,4-dioxane to be a potential constituent of concern in the referenced settling pond area. Please collect an soil samples near boring SB-112 at the depths where TCE was detected in the past and analyze for 1,4-dioxane (see Comment #2a) to determine the presence or absence of 1,4-dioxane.
2. **Former Degreaser Area:**
 - a. Please add two soil sampling locations to the proposed soil boring locations shown on Figure A-1 of the subject submittal at location: 1) due south of soil boring HA-3 on the southern blue line shown on the figure, and 2) approximately 125 feet east of the first requested boring. Soil samples should be collected and analyzed as proposed for the original proposed eight borings proposed in the work plan.
 - b. **Analytical Method:** 1,4-dioxane should be analyzed using U.S. EPA Method 8260 with Selective Ion Monitoring (SIM) unless the laboratory can ensure that practical quantitation limits will be lower than the applicable Type 1-4 RRS for soil without using SIM in order to ensure that the goals of the investigation can be achieved.

Ingersoll-Rand c/o Mr. Mike Goldstein
Thermo-King (Former) Facility, Louisville, Jefferson County, GA, HSI 10702
May 24, 2018
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Please proceed with the planned soil investigation, with the modifications requested above, at your earliest convenience. EPD will expect to receive a CSR Addendum that includes: 1) results of the soil investigation, 2) a final soil certification of compliance statement, 3) revised Operations and Monitoring (O&M) Plan for maintaining soil and groundwater compliance with Type 5 RRS.

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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