



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

May 16, 2019

Via US MAIL and EMAIL

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

Re: December 20, 2018 Voluntary Remediation Program Compliance Status Report Addendum and January 31, 2019 Post-VRP CSR Annual Monitoring Report for 2018
Thermo King Corporation Site, HSI Site No. 10702
1430 Highway 24 East, Louisville, Jefferson County, Georgia
Tax Parcel 0090-024

Dear Mr. Goldstein:

The Georgia Environmental Protection Division (EPD) has reviewed the January 31, 2019 VRP Post-VRP CSR Annual Monitoring Report for 2018 prepared and submitted on your behalf by Wood Environment & Infrastructure Solutions, Inc. (Wood) and has the following comments:

1. Item #8 of the site UEC states that permanent markers are to be installed and maintained to delineate the *restricted areas* where engineering controls are to be used to prevent unacceptable exposure (e.g., the concrete building slab/surface pavement and the rip-rap blanket referenced in Condition #2.b. below). Please provide documentation of the installation of said markers (include photographs) at *each* of the engineered control areas (the concrete building slab and part of the adjacent paved parking lot and the rip rap area).
2. The O&M Plan Engineering Control O&M Plan and Inspection Schedules for engineering controls as provided in Appendix D of the December 2019 VRP CSR should be modified to include:
 - a. **Land Use/Access and Groundwater Use Limitations:** A checklist for inspecting/confirming: 1) Property access and 2) groundwater and land use limitations similar to the inspection checklists for the Soil Type 5 Compliance/Control and the Rip-Rap Control Areas.
 - i. Please ensure that the following are inspected in addition to those items already included:
 - Presence and condition of fencing, gates and locks used to prevent unauthorized access to the Property.
 - Inside areas of all onsite buildings, including storage sheds, etc., to ensure that activity/use limitations outlined in Item #6 of the UEC are complied with (e.g., land use, etc.).
 - Presence, condition, and repair (as necessary), of the permanent markers referenced in Comment #1 above.
 - ii. In addition, if applicable, there should be verification provided that:

- The VRP Site meets the definition of non-residential property as defined in §391-3-19-.02(2)§.
 - All leases or other property instruments for the site have the applicable deed notice language inserted into them.
- b. **Groundwater Monitoring Wells:** A checklist for inspecting/confirming the condition, and repair (if necessary) of the remaining onsite monitoring wells.
3. **Repair/Corrective Measures to Maintain Compliance:**
- a. EPD approval to proceed with necessary/routine maintenance or repairs of engineered controls used to prevent human or ecological exposure (including, fencing, building structures, concrete slab, pavement, or rip-rap cover repairs) *is not necessary* and remedial actions should be conducted during or shortly after the time of inspection. If repairs cannot be conducted within 30-days of discovery, EPD shall be notified in writing within 30 days of discovery along with a description of the proposed repairs and a reasonable (60- to 90-day) schedule for completing said repairs.
 - b. EPD shall be notified in writing of any changes in land use (currently vacant) within 30-days of discovery and/or 60-days prior to a planned change in use along with a description of any necessary changes to exposure controls and a proposed implementation schedule for said changes.
4. **Annual O&M and Land Use Inspections and Reporting:**
- a. Annual O&M Inspections and Reporting shall continue until engineering and land use restrictions are no longer necessary to prevent unacceptable human and/or ecological exposure. Specifically, soil and groundwater are in compliance with residential (Type 1 and/or Type 2, whichever is greater) RRS and seep water is in compliance with Georgia In-Stream Water Quality Standards.
 - b. Annual Engineering Controls O&M and Land Use Reports shall be submitted to EPD by no later than January 31st beginning with January 31, 2020.
 - c. Future O&M and Land Use Reports shall include the following certification signed by a representative of the property owner/VRP participant:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted I, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME (Please type or print)

TITLE

SIGNATURE

DATE

Please note: EPD does not concur that it is necessary to revise the UEC as proposed in Section 4.0 of the December 2018 CSR Addendum at this time. The UEC should only be revised based on a change in existing conditions that cannot be addressed through the revision of the O&M Plan for implemented engineering controls, changes in land or groundwater use restrictions/limitations, and/or the removal of the permanent markers referenced in Comment #1 above.

EPD will expect to receive a revised O&M Plan and proof of installation of the required markers as referenced above by no later than July 19, 2019. If you have any questions regarding these comments, please contact Ms. Carolyn L. Daniels, P.G. of the Response and Remediation Program at (404) 657-8646.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Rhonda N. Quinn, P.G., Wood (via email)
File: 199-010, VRP/HSI Site 10702: Thermo King, Inc.