

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334

Reply To:

Response and Remediation Program
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Suite 1462, East Tower
Atlanta, Georgia 30334-9000
Office 404-657-8600 Fax 404-657-0807

Mark Williams, Commissioner
Environmental Protection Division
Judson H. Turner, Director
Land Protection Branch
Keith M. Bentley, Branch Chief

COPY

February 8, 2013

Carpenter Technology Corporation
c/o Sean McGowan
105 West Bern Street
Redding, Pennsylvania 19612

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Notice of Incomplete Voluntary Remediation Program Application
Comments on March 30, 2012, Response to EPD Comments and on March 2012
Semiannual Report
General Time Corporation, HSI Site No. 10355
100 Newton Bridge Road, Athens, Georgia; Clarke County
Tax Parcel ID No. 112 003

Dear Mr. McGowan:

The Georgia Environmental Protection Division (EPD) has reviewed the March 23, 2012, Voluntary Investigation and Remediation Plan (VIRP), submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) as an application for the site's entry into the Voluntary Remediation Program (VRP). In conjunction with review of the VIRP, we have also reviewed the March 30, 2012, Response to EPD Comments, and the March 2012 semiannual report. EPD has determined that the VIRP is incomplete and that submittal of a revised VIRP will be necessary. Our comments are provided below.

- 1) Given that a corrective action plan (CAP) and remedial method have already been approved and chosen for this site, EPD would expect the site to move from that point forward upon entry into the VRP. EPD conditionally approved a CAP for this site in our letter of March 11, 2010. The CAP provided for hydraulic control of the plume via a groundwater extraction and treatment system, to be installed on the General Time property and which would discharge to the sanitary sewer. However, the VIRP application submitted proposes to evaluate several remedial options and does not commit to continuing the already approved CAP. Subsequent emails with Carpenter Technology confirmed that Carpenter is not committing to implement the already approved CAP. While EPD is open to the possible addition of supplemental remedial methods in the VIRP application to enhance the remedial process or to speed up the remedial timeframes, EPD believes it is essential that the already approved CAP should be implemented as part of the VRP remediation plan.
- 2) In our November 17, 2011, comment letter, we expressed concern that dense-non-aqueous-phase liquid (DNAPL) may be present in the subsurface near the vicinities of MW-16I and GP-03. The Response to EPD Comments stated that the potential for DNAPL is acknowledged and will be considered during remedial design. In the revised VIRP, please provide a narrative on how the proposed remedial technologies will address potential DNAPL.

- 3) Individuals within the former on-site manufacturing building could be exposed to harmful vapors. Furthermore, the potential for vapor intrusion may be present in downgradient buildings on other properties. Please provide a plan for evaluating the potential vapor-intrusion pathway. Preferably, the plan should include an EPA-recognized or otherwise peer-reviewed vapor-intrusion model (Johnson & Ettinger is an example of one such model).
- 4) Neither a point of exposure nor an associated point of demonstration was specified in the VIRP. Under the Act, a point of exposure is defined as the nearest of the following locations:
 - The closest existing downgradient water supply well
 - The likely nearest future location of a downgradient drinking water supply well where public supply water is not currently available and is not likely to be made available within the foreseeable future; or
 - The hypothetical point of drinking water exposure located at a distance 1,000 feet downgradient from the delineated site contamination.

Due to the geographical extent of the plume and the presence of the Oconee River east of the site, a point of potential drinking water exposure cannot be determined using the above criteria. However, regulation of contaminant discharge into the waters of the state is necessary to protect human health and the environment. EPD does not believe sufficient evidence has been presented to support the second bullet item in Section 3.4.3 of the VIRP, which states that VOCs attenuate before reaching the river. Specifically:

- a. The trichloroethene (TCE) concentration at well MW-11I was 766 micrograms per liter (ug/L) in December 2011. MW-11I is only about 20 feet upgradient of the Oconee River, based upon observations made by EPD during a January 7, 2013, visit to the MW-11 well cluster. The proposed remediation plan should include a projection of the TCE groundwater concentration at the groundwater-river interface. The projection can be obtained by assuming that the groundwater concentration at MW-11I equals the groundwater concentration at the river, or from a groundwater sample obtained next to the river, or from an EPA-recognized or otherwise peer-reviewed groundwater contaminant fate-and-transport model.
- b. The TCE concentration at well MW-9I was 1,110 ug/L in December 2011. MW-9I is about 1,200 feet west of the Oconee River. No groundwater data is available between MW-9I and the river. Installation of one or more wells east of MW-9I should be proposed in the remediation plan to better assess contaminant migration. Groundwater concentrations at the river can then be projected using one of the methods specified above in Comment 6a.
- c. Surface water in the two Oconee River tributaries also need to be protected against excessive contaminant discharge from groundwater. Surface water monitoring of the two tributaries bordering the site on the north and south, along with a long-term plan to protect those tributaries, will be required in the remediation plan.

Please submit a revised VRP to EPD by May 13, 2013. Carpenter Technology Corporation must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards, and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Carpenter Technology Corporation. However, failure of EPD to respond to a submittal within any timeframe does not relieve Carpenter Technology Corporation from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Allan Nix at (404) 657-8600.

Sincerely,



Derrick Williams
Program Manager
Response and Remediation Program

c: Mark Miesfeldt, Haley & Aldrich

File: HSI No. 10355