

Georgia Department of Natural Resources
Environmental Protection Division

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January 5, 2016

VIA EMAIL & REGULAR MAIL

Roper Pump Company
c/o Joe Renzetti, Owner
3475 Old Maysville Road
Commerce, GA 30529

Re: HSI Site Number: 10901
Roper Pump Company
Tax Parcel ID #034-032
3475 Old Maysville Road
Commerce, Jackson County, GA

Dear Mr. Renzetti:

The Georgia Environmental Protection Division (EPD) has received the September 24, 2015, "Risk Reduction Standards" letter, and the October 23, 2015, Voluntary Remediation Program (VRP) Progress Report and "Response to Comments," submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by Environmental Planning Specialist, Inc. (EPS) on behalf of Roper Pump Company. After completing its review of these referenced documents, EPD has prepared the following comments:

- 1) The October 2015 Report submittal adequately addresses the following comments from EPD's April 13, 2015, VRP Comments letter: Comments (3a.) & (3d.), Comment (6), & Comment (7) with the exception of the below listed risk reduction standards comments. Approval of the remainder of the responses (1-4 & 8-10) is pending the submittal of additional information, which will be included in future report submittals.
- 2) After completing a review of the available soil characterization data for the site, EPD has determined that additional vertical and horizontal delineation soil sampling data for volatile organic compounds (VOC) will be required for the area north of B-1 and the 1-foot excavation area. While there are multiple soil sample locations around the periphery of the release area that exceed Type 1-4 risk reduction standards (RRS), EPD will defer further VOC soil characterization comments until after the receipt of the additional data from the planned soil vapor and groundwater investigations. However, please note that confirmation soil samples may be required in the future to define the compliance status of the site once the established corrective action is complete.
- 3) According to the October 2015 Report, two offsite delineation wells (east of MW-8, MW-3, and MW-11), and one onsite vertical delineation well have been proposed on the eastern property boundary. EPD concurs with these proposed monitoring locations; however, based on the data provided within the October 2015 Report, additional groundwater investigation activities, in addition to the three proposed well locations, will need to be completed. Therefore, EPD has prepared the following additional groundwater delineation and characterization comments:

- a. The Site will need to utilize the additional delineation and characterization data to determine a “point of exposure” (POE) and corresponding “point of demonstration” (POD) for the groundwater exposure pathway. Considering the nature of the contamination and its potential migration characteristics in fractured bedrock, EPD recommends that the private groundwater wells within 1,000-feet of the site be incorporated into one of the future sampling events.
 - b. EPD does not concur with the October 2015 Report conclusion that groundwater VOC concentrations have been horizontally delineated north of former temporary locations TW-8, TW-1, and well MW-6/-6D.
 - c. EPD recommends the use of nested wells when installing the proposed additional vertical groundwater delineation wells. More specifically, consideration should be given to designing a well that is screened not only at the partially weathered rock/bedrock interface, but also across the residuum/partially weathered rock interface, as there appears to be a spike in the boring log PID readings at this approximate depth interval in and around the suspected source area(s). In addition, information should be provided in future reports to demonstrate the vertical hydraulic gradient and the interconnectivity of the water bearing fractures within the bedrock.
 - d. Hexavalent chromium has been detected at levels above the proposed delineation criteria (0.02 ug/L) at all monitoring locations onsite. Please include a plan for installing a sufficient amount of groundwater wells offsite in order to address the groundwater delineation requirements for hexavalent chromium, including to the south of monitoring well MW-14 and proximal to the adjacent Roper Pump Company chromium plating facility.
 - e. Please ensure that for future groundwater monitoring events that the laboratory reduces the detection limit for arsenic to 0.010 mg/L.
- 4) The August 26, 2015 letter from EPD retracted a condition of acceptance of Roper Pump Company into the VRP, but also noted that Roper would conduct a limited assessment to investigate the metals detected in soil/sediment during previous investigations. As a result of the detections of hexavalent chromium in the groundwater onsite, and as a follow-up to the “Response” to Comment (8) and to the August 26, 2015 EPD letter, please ensure that the next VRP Progress Report includes the results from a comprehensive investigation of hexavalent chromium in soils, sediments, and groundwater both onsite and offsite that may be contributing to the impacted groundwater onsite.
- 5) The “Response” to Comment (9) stated that the 92,000 µg/m³ detection of benzene at VI-4 was minor and does not pose a significant contaminant threat to soil or groundwater. In order to confirm that there has not been a release of benzene to subslab soils EPD requests that the VI-4 area vapor probes be incorporated into the planned vapor probe resampling. In addition, EPD recommends Roper Pump Co. determine if benzene or products containing benzene are being used within the building where these vapor samples are being collected.

- 6) Section 3.4 (Remediation) of the October 2015 Report indicated that VOC capture has not been quantified for the SVE system since September 2013 as the carbon has not required change-out. Please include routine influent and effluent vapor analyses for the SVE system as a performance monitoring measure for the ongoing soil/source material corrective action.

Risk Reduction Standards (RRS) Comments:

- 7) EPD concurs with the use of a DAF of 1 in SSL calculations for the following constituents: 1,1,1,2-tetrachloroethane, 1,1,2-trichloroethane, benzene, cis-1,2-DCE, PCE, TCE, and hexavalent chromium. The use of a DAF of 20 for the remaining COCs is acceptable. Please update future reports to indicate the applicable RRS rather than providing multiple tables based on both a DAF of 1 and a DAF of 20.
- 8) Please note that the Kd value provided for chromium, total on Table 2 is incorrect. The report states that the value of 850 is from the Soil Screening Guidance (SSG) assuming a pH of 7; however, EPD cannot confirm this value as total chromium is not listed in Table C.1 of the SSG.

The above listed comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. In accordance with the approved VRP schedule, the next Progress Report is due by April 15, 2016. Should you have any additional questions or concerns please contact Kevin Collins of the Response and Remediation Program at (404) 657-8660.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

cc: Justin Vickery, EPS (via email)

File: VRP – Roper Pump Company #10901