

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

March 16, 2016

VIA EMAIL & REGULAR MAIL

United Technologies Corporation
c/o Beth Lang, Remediation Manager
5469 Jacobs Drive
Holly, Michigan 48442

Re: Annual VRP Groundwater Monitoring Progress Report (December 16, 2015)
Semi-Annual VRP Progress Report (December 16, 2015)
Former United Technologies Automotive Site, HSI # 10543
1884 Warrenton Highway, Thomson, McDuffie County, Georgia
Tax Parcel ID # 00200056

Dear Ms. Lang:

The Georgia Environmental Protection Division (EPD) has reviewed the December 16, 2015 Annual and Semi-Annual VRP Progress Reports for the above-referenced site documenting activities that occurred during 2015. EPD concurs with finalizing the execution of the Uniform Environmental Covenant (UEC) proposed. EPD has the following comments which should be addressed in accordance with the Voluntary Remediation Program Act (the Act):

Comments:

1. Comment #1 of EPD's June 30, 2015 letter discussed the potential installation of a deeper monitoring well if TCE concentrations continued to be reported above the Risk Reduction Standards (RRS) at M-17. TCE has been reported above the Type 4 RRS for the past four (4) sampling events. In addition, the Mann-Kendall Statistics Summary documented in Appendix E shows TCE as "increasing" in M-17 with a confidence trend of 96.9%. EPD is not requiring that a deeper well be installed at this time; however, if TCE concentrations continue to be reported above the Type 4 RRS at M-17, the installation of a deeper monitoring well will be required. As specified by the Act, vertical delineation is required within 30 months of enrollment.
2. TCE also continues to be reported in groundwater above the Type 4 RRS at boundary wells M-07 and M-10. 1,1-DCE was also reported above the Type 4 RRS at boundary well M-09 during the June 2015 sampling event at concentrations two (2) times the level reported during the December 2014 sampling event, 340 µg/L to 698 µg/L, respectively. Please continue to sample and closely monitor boundary wells M-07, M-09, and M-10 and if concentrations continue to increase, additional wells may be required to the west of these wells. In addition, TCE concentrations at M-14D, located near the suspected release area to the east of M-07, M-09, and M-10, were reported at the highest levels since 2010 at 581 µg/L and is likely contributing to the elevated concentrations of VOCs reported in nearby wells.
3. Comment #2 of EPD's June 30, 2015 letter requested a soil gas sampling plan with proposed locations near the west portion of the main building. AECOM's October 16, 2015 response to EPD's

comment stated that the Johnson and Ettinger (J&E) Model proved to be an effective method of demonstrating that vapor intrusion risks do not exist on-site and indicated no additional vapor intrusion investigation was necessary. EPD agrees that the J&E Model can be an effective tool for modeling subsurface vapor intrusion; however, because groundwater at M-17 was observed at less than 5 feet-below ground surface (ft-bgs), additional lines of evidence, including soil gas sampling, is warranted.

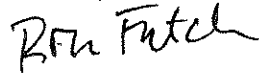
Multiple EPA vapor intrusion guidance documents, including *OSWER Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface Vapor Intrusion Guidance)*, state that the use of generic groundwater attenuation factors are inappropriate when groundwater depths are less than 5 ft-bgs. Because groundwater was measured at 0.28 ft-bgs at M-17, please collect sub-slab soil gas samples near the western portion of the main building as initially requested in Comment #2 of the EPD's June 30, 2015 letter.

4. Section 2.0 of the December 2015 Annual VRP Progress Report proposes to attempt to locate monitoring wells MW-1R, M-12, and M-12R during the June 2016 sampling event. EPD concurs that these wells should be located and surveyed. If the wells cannot be located, EPD may recommend installing new replacement monitoring wells in the future. Due to the fact that VOC concentrations have never been reported in M-12, EPD agrees M-12 can be abandoned if located.
5. The depth to water drawdown was recorded at over 8 feet on the Well Purging and Sample Collection Form for M-18. EPD understands that recovery rates vary at each well, but please make all reasonable attempts to reduce drawdown by adjusting the pump rate of the pump. If drawdown continues, please "chase" the water column until the well is evacuated. In addition, initial groundwater parameter readings were not included at M-04 and notations began after two (2) gallons had been purged from the well. Please include all data from the beginning of purge to the collection of the sample. Purge volumes on every Well Purging and Sample Collection Form were all noted in 0.25 gallon increments. In the future, please accurately measure and note the actual volume purged and follow SESDPROC-301-R3 to ensure groundwater samples are collected and documented accurately.
6. Comment #5 of EPD's June 30, 2015 letter requested groundwater sampling from the Point of Demonstration (POD) monitoring wells M-3, M-3A, and M-4. Section 4.0 of the December 2015 VRP Annual Progress Report documents M-3 and M-3A as POD wells, but does not include M-4. EPD requests M-4 be added as a POD well because the recorded groundwater flow direction is historically towards the east and the northeast.
7. Section 2.1 of the 2015 Annual VRP Progress Report states that monitoring wells were inspected for missing bolts, o-rings, or damage to the well that might affect its structural integrity. However, during EPD's May 15, 2015 site visit, several bolts were noted as missing on many of the flush mount caps. Please ensure any missing bolts and/or o-rings are replaced during the next sampling event to preserve the integrity of each well.

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EPD anticipates receipt of the next Semi-Annual Progress Report by June 1, 2016. Should you have any question or concerns regarding this site, please contact Mr. Peter E. Johnson, P.G. of the Response and Remediation Program at (404) 657-0490.

Sincerely,

A handwritten signature in black ink that reads "Robin Futch". The signature is written in a cursive, slightly slanted style.

Robin Futch, P.G.
Acting Unit Coordinator
Response and Remediation Program

cc: Tracey Hall, AECOM (via email)
Matthew Buschbacher, HP Pelzer Automotive Systems, Inc. (via email)

File: HSI# 10543

