

Georgia Department of Natural Resources
Environmental Protection Division – Land Protection Branch
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Office 404-657-8600/Fax 404-657-0807
Judson H. Turner, Director

June 26, 2014

COPY

VIA E-MAIL AND REGULAR MAIL

Trust for Benefit of Brenda Heisey and
Rheem Manufacturing
c/o Ms. Hollister Hill
Troutman Sanders, LLP
600 Peachtree Street, NE, Suite 5200
Atlanta, Georgia 30305

Re: Voluntary Remediation Program
Semi-Annual Progress Reports April 30, 2012, October 30, 2012, April 30, 2013,
October 30, 2013, and April 30, 2014
139 Brampton Road (former Rheem Manufacturing), HSI Site No. 10208
Savannah, Chatham County, Georgia
Tax Parcel ID#1-0720-01-002

Dear Ms. Hill

The Georgia Environmental Protection Division (EPD) has reviewed the subject Semi-Annual Progress Reports that have been submitted pursuant to the Georgia Voluntary Remediation Program Act (Act) O.C.G.A. §12-8-100 et seq. EPD has the following comments:

1. Please note that the groundwater sampling procedures of Region 4 EPA SESDPROC-R2 effective October 28, 2011, have been replaced by SESDPROC-R3 effective March 6, 2013.
2. Although the final Type 4 Risk Reduction Standard for Lead in soil was based on a leaching calculation, it should be noted that EPD is not allowing the use of alternate values for the Geometric Standard Deviation of blood lead concentration among the exposed adult population (GSD) when calculating the Georgia Adult Lead Model. The default value of 2.04 must be used.
3. Groundwater sampling forms from the March 2012 sampling event do not indicate the volume of water purged from the wells, the depth of the well screen interval, or if the tubing used was teflon. This should be provided for all sampling events. Also, EPD recommends that for the multiple purge volume method, the pump intake be placed at the top of the water column during purging of shallow wells rather than at the screen midpoint.
4. The soil remediation plan presented in the April 30, 2014 report appears to be based on a flawed area averaging methodology. To use area averaging for contamination in soils, the sampling data from each exposure domain must be collected using unbiased methods such grid sampling. Otherwise, the data must be evaluated using more complex geostatistical methods that take into account

the special distribution of the data along with other factors. Most of the sample locations at this site were based identifying known release areas and/or for the purpose of delineating the extent of contamination; therefore, the data set is not appropriate for area averaging using simple statistical methods.

Further, the site would need to be broken down into multiple smaller exposure domains based on accessibility, and other factors. Based on the relatively small amount of soil in exceedance of the Type 4 standard, it is recommended that a simple bright line removal cleanup be considered. The cost of such removal would likely be less than the burden of collecting the necessary data and performing the statistical evaluation to support an area averaging approach to cleanup; however, if you wish to pursue the area averaging method for soil cleanup, it is recommended that you consult with EPD to discuss an appropriate strategy moving forward.

Should you have any question or concerns regarding this matter, please contact Mr. Bill Williams of the Response and Remediation Program at (404) 657-8664.

Sincerely,

A handwritten signature in black ink, appearing to read "David Reuland". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

David Reuland
Unit Coordinator
Response and Remediation Program

c: Charles T. Ferry, AMEC
File: HSI 10208