

Georgia Department of Natural Resources
Environmental Protection Division

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Judson H. Turner, Director
Land Protection Branch
Phone: 404/657-8600 FAX: 404/657-0807

May 7, 2015

Carpenter Technology Corporation
c/o Mr. Sean McGowan
Manager, Environmental Affairs
P.O. Box 14662
Reading, Pennsylvania 19612-4662

VIA FIRST CLASS MAIL AND EMAIL

COPY

Re: EPD Comments on VRP Semiannual Report 1, dated October 16, 2014
General Time Corporation, HSI Site Number 10355
Athens, Georgia; Clarke County

Dear Mr. McGowan:

The Georgia Environmental Protection Division (EPD) is in receipt of the first VRP semiannual report on the General Time facility, HSI site number 10355. This document was submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). Our comments are provided below.

- 1) A semiannual monitoring program on site, of both groundwater and surface water, will be required and should be implemented immediately. Specify sampling points for the monitoring program, including wells and four surface-water locations. For more detail, refer to Comment 4 in EPD's April 16, 2014, letter, Supplemental Comments on Revised Voluntary Remediation Program Application of December 2013.
- 2) As of the date of this letter, the second VRP semiannual report, which was due on April 16, 2015, has not been received. To avoid possible removal of the site from the VRP, reports must be submitted in a timely fashion.
- 3) Please calculate updated risk-reduction standards for the constituents of concern on site. Refer to Comments 1, 2, and 3 in EPD's April 16, 2014, supplemental comments letter.
- 4) No site plan, potentiometric-surface map, or sampling-location plan was presented in the report. Accordingly, the locations of surface water sampling points SW-1 and SW-2 could not be determined. Every future VRP semiannual report should include:
 - a. A site plan depicting the location of every well on site
 - b. A sample-location map depicting surface-water and groundwater sampling locations; the map should include callouts specifying detected concentrations of individual COCs at each sampling location
 - c. A potentiometric-surface map indicating the direction of groundwater flow across the site
- 5) EPD remains concerned that the groundwater-surface water transitional zone, the riparian zone, and surface water in the vicinity of the MW-11 well cluster may have been impacted by TCE concentrations in groundwater. The MW-11 wells are located in possible wetlands, which heightens EPD's concern regarding the dissolved TCE plume in that area. Accordingly:

- a. Propose an ecological assessment for that portion of the site, including sediment sampling. For the site to be eventually delisted under the VRP, the ecological assessment and any associated remediation must be conducted within the time frame allotted for completion of all VRP activities.
 - b. Provide GPS coordinates obtained in the field for the MW-11 well cluster, as requested in Comment 7(b) of EPD's April 16, 2014, supplemental comment letter, and as requested in earlier EPD documents. These coordinates should be provided in the next semiannual report, or sooner if they are available. Along with the coordinates, provide the date and time they were obtained, weather conditions, the make and model of the GPS unit, and the margin for error.
- 6) Evaluate the potential for vapor intrusion in buildings downgradient of the former General Time facility. We recommend use of the EPA VISL screening tool and then, if risk standards are exceeded, use of a more advanced model, such as Johnson & Ettinger. EPD does not concur with the hypothesis that clean groundwater overlies contaminated groundwater downgradient of the former General Time facility. More data is required to support this conclusion, because insufficient data is available to make a definitive statement on contaminant stratification within the on-site aquifers.
 - 7) A point of exposure and point of demonstration will have to be specified, pursuant to the Act. Refer to Comment 5 in EPD's April 16, 2014, supplemental comments letter.
 - 8) Regarding future groundwater sampling, please note the following:
 - a. EPD requires adherence to the USEPA Region 4 groundwater sampling operating procedures (OPs), "Procedure SESDPROC-301-R3, Groundwater Sampling," effective March 6, 2013. The OPs and can be accessed on the Internet at <http://www.epa.gov/region4/sesd/fbqstp>.
 - b. On all groundwater sampling field logs, the depth to the tube or pump intake should be included. When conducting low-flow sampling or micropurging, the pump intake should be positioned in the middle of the screened interval, whereas with a traditional multi-volume purge, the pump intake should be positioned near the top of the water column.
 - c. Turbidity in groundwater samples should be less than 10 NTUs whenever possible. Low turbidity is especially important in groundwater samples that will be undergoing metals analysis.
 - 9) Groundwater-sampling field logs and a narrative describing groundwater-sampling protocols should be provided in every semiannual report. No groundwater sampling logs or a description of the MW-8I groundwater sampling protocols were provided in the current report.
 - 10) Please provide future digital copies of semiannual reports in a searchable PDF format. A copy of EPD's guidelines on document-submittal formatting is enclosed

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.

General Time Corporation, HSI Site Number 10355

EPD Comments on VRP Semiannual Report 1

May 7, 2015

Page 3 of 3

If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404)657-8600.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

Enclosures: RRP Document Submittal Format

c: Mark Miesfeldt, Haley & Aldrich (via email)

Response and Remediation Program Document Submittal Format

All documents more than 25 pages in length shall be submitted as one paper copy and two compact disc (CD) copies with the documents in searchable (i.e., tagged) Portable Document Format (PDF). A signed certification page must be included in the CD copies. The certification page states that the electronic copy is complete, identical to the paper copy, and virus free.

All documents currently in electronic format should be converted into the searchable PDF format. All documents not available electronically and pages that contain signatures, initials, or other information not in the electronic copy should be scanned into a searchable PDF format including the signed certification page. Scanning should be at 200 dpi with any documents requiring color being scanned in color.

The document should be broken down into multiple searchable PDF files along the following guidelines with the file name referenced in the table of content.

Table of Contents

Signature / Certification pages

Main body of document

Each Attachment (Appendices, Tables, Figures, Reports, etc.)

For ease of posting on EPD's web page, all Voluntary Remediation Program CD submittals should also contain the entire document in a single PDF file, identical to the paper copy, in addition to the multiple searchable PDF files listed above.

The CDs shall be enclosed in a jewel case. The CD shall be labeled with the following information written on the CD in indelible ink or affixed to the CD with an adhesive CD label.

Site Name

Site Address

HSI Number

City

County

Document Name

Document Date