

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

January 16, 2014

VIA E-MAIL AND REGULAR MAIL

COPY

Textron, Inc.
c/o Mr. Jamie Schiff
40 Westminster Street
Providence, Rhode Island 02903

Re: Corrective Action Plan, September 25, 2013
December 2013 Semi-Annual Voluntary Remediation Program Progress Report
June 2013 Semi-Annual Voluntary Remediation Program Progress Report
December 2012 Semi-Annual Voluntary Remediation Program Progress Report
June 2012 Semi-Annual Voluntary Remediation Program Progress Report
Manchester Tank Company, HSI No. 10765
811 West Avenue
Cedartown, Polk County, Georgia
Tax Parcel 024-014

Dear Mr. Schiff:

The Georgia Environmental Protection Division (EPD) has reviewed the above referenced documents which were submitted for the former Manchester Tank Company site in accordance with the Voluntary Remediation Program Act (the Act). The Corrective Action Plan (CAP) was submitted in accordance with the approved April 2010 Voluntary Investigation and Remediation Plan (VIRP) and proposes the following corrective actions to achieve compliance with Risk Reduction Standards (RRS):

- **Soil** – The applicant has demonstrated compliance with Type 3 RRS for metals and Type 1 RRS for volatile organic compounds (VOCs) in soils.
- **Groundwater -**
 - **Source Area** – Compliance with Type 5 RRS in the source area with groundwater concentrations exceeding 5,000 micrograms per liter (ug/L) and engineering controls (extraction) to prevent contaminant migration.
 - **Dissolved Plume** – Achieve Type 4 RRS through extraction and treatment of contaminated groundwater on the remainder of Parcel No. 024-014 and on adjacent non-residential properties. Achieve compliance with Type 1 RRS for VOCs in groundwater migrating to a small portion of the nearby residential area.

EPD has determined the corrective action plan is complete, and, subject to the conditions outlined below, hereby approves the proposed corrective action plan and associated schedule. EPD acknowledges Textron, Inc. (Textron) as the current applicant and participant for the qualifying property referenced above, in place of Trinity Industries, Inc., provided Textron implements the VIRP in compliance with the Act.

1. The schedule proposed in the CAP exceeds the 5-year timeframe for submittal of the Compliance Status Report (CSR) as established in the Voluntary Remediation Program (VRP) checklist and the April 2010 VIRP application. EPD will issue a draft consent order to

memorialize the revised schedule in compliance with the Act. Note that the schedule should be modified to show semi-annual reporting through submittal of the CSR.

2. An Environmental Covenant in conformance with O.C.G.A. 44-16-1, et seq., the "Georgia Uniform Environmental Covenants Act" must be executed as part of the corrective actions at the site. This covenant must prohibit residential use of the property, must require that no drinking water wells be installed on the site, and require that any future construction plans for building on the site be evaluated for risks associated with vapor intrusion.
3. The adjacent impacted properties have not currently been designated as qualifying properties under the Act. Therefore, they continue to be addressed under the Hazardous Site Response Act. Although not clearly specified in the CAP, it appears that monitored natural attenuation (MNA) will be the proposed mechanism for attainment of RRS once hydraulic containment of the plume has been established. Prior to, or concurrent with CSR submittal, Textron must demonstrate that compliance with RRS will be achieved within a reasonable timeframe and/or enter the properties into the VRP with the use of appropriate institutional controls. Please install and periodically monitor a permanent monitoring well in the impacted residential area (GP-2A vicinity) in order to monitor the efficacy of the extraction system and obtain the data necessary to make the demonstration for that area.
4. In all future Semi-Annual Progress Reports describing soil, groundwater, vapor, or surface water sampling events please provide the field sampling forms, a summary of the field sampling parameters recorded during the sampling events, and a discussion of the sampling protocols and methods used. Please note that when a field activity is described in a report, specific details on how and at what depth samples were collected, what analyses were performed, and the corresponding analytical reports should be provided. Please provide this information for the 2013 soil gas sampling event in the next progress report.
5. The background data set for soils provided is acceptable to EPD and can be used for compliance purposes. EPD concurs that for soils chromium meets Type 3 RRS and all other metals meet residential standards. However, EPD does not concur that other metals besides chromium were not contaminants of concern for the site.
6. Please provide additional details for the Geoprobe samples that were attempted including the depths at which the borings were terminated and what sampling methods were used for GP-2A and GP-10A.
7. MW-55D completes the vertical delineation requirement for groundwater but the horizontal delineation of the groundwater plume is incomplete. To confirm completion of horizontal delineation in groundwater, GP-10A should be replaced with a permanent monitoring well and groundwater samples collected and analyzed to confirm the results.
8. The groundwater RRS values provided in Table 4-2 of the CAP are correct; however the units are incorrect. Please note that the correct units are ug/L for all values.
9. The June 2013 Progress Report noted that, based on groundwater concentrations, vapor intrusion of TCE and VC has the potential to exceed target risks to nearby residents. However, since the constituents were not detected in soil gas samples, the no further action was recommended. The potential for vapor intrusion must be re-evaluated in the future if groundwater concentrations in the vicinity of GP-2A do not decline within a reasonable timeframe.

10. For the proposed treatment system shown in Figure 6-3 in the CAP, please note that all air emissions must be treated using the Best Available Control Technology, e.g., thermal oxidizer or carbon.
11. The site figures showing groundwater sampling results are difficult to read and to interpret. Please enlarge these figures to an 11 x 17 format and remove potentiometric data. Also, please make the numbers more legible as it is difficult to read the concentration numbers on the aerial photo background. On all figures, when analytical data is being shown, please specify the date(s) of the sampling event for which sampling results are posted.
12. On all future figures and tables please post contaminant concentrations using the analytical result as (<XX.XX), where the XX.XX represents the detection limit rather than stating that a result was not detected (ND) or below detection limit (BDL).

Textron must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, and standards of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Textron. However, failure of EPD to respond to a submittal within any timeframe does not relieve Textron from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Textron fail to comply with the approved schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program.

Please continue to submit Semi-Annual VRP Progress Reports as described in the Act. EPD anticipates receipt of the next Semi-Annual VRP Progress Report by June 1, 2014. Please provide updates on the remedial technology evaluation in the next Semi-Annual VRP Progress Report.

If you have any questions, please contact Robin Futch PG, PMP of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Andrew P. Romanek, P.E., BCEE, CDM Smith
J. Thomas Duffey, P.G., CDM Smith

File: HSI 10765

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