

Georgia Department of Natural Resources

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Chris Clark, Commissioner
Environmental Protection Division
F. Allen Barnes, Director
Land Protection Branch
Mark Smith, Branch Chief
404-657-8600

May 17, 2010

VIA E-MAIL AND REGULAR MAIL

FILE COPY

Thermo King Corporation
c/o Mr. David A. Kolb, ESH and Facility Manager
1430 Highway 24 East
Louisville, Georgia 30434

Re: Revision to Voluntary Remediation Plan and Application, March 18, 2010
Thermo King Corporation Site, HSI Site No. 10702
Louisville, Jefferson County, Georgia
Tax Parcel 0090-024

Dear Mr. Kolb:

The Georgia Environmental Protection Division (EPD) has reviewed the March 18, 2010, Revision to Voluntary Remediation Plan (VRP) and Application, which has been submitted in lieu of a corrective action plan (CAP) for the above referenced qualifying property. EPD has noted the following items:

Ecological Risk Assessment Comment

1. Your response to EPD's comment 16 states heavy rip rap will be placed in the gully where Seep C and Manson Branch #2 are located such that seep water flows below the rip rap surface. EPD does not agree that placement of rip rap is an acceptable engineering control that eliminates exposure to contaminated surface water coming from the seeps. Additionally, by allowing the contamination to continue to discharge from the seeps, you are in violation of §12-5-29(a) of the Georgia Water Quality Control Act.

Other alternatives may include a groundwater/surface water extraction and treatment system, a permeable reactive barrier, etc. This office has been advised extracted groundwater may be treated under your existing pretreatment system. Please also be aware that you may need to apply for a stream buffer variance for such corrective actions.

Risk Reduction Standard (RRS) Comment

2. It appears that default soil/water partition coefficients (Kd) were calculated using a fraction organic carbon in soil (f_{oc}) value of 0.02. Consistent with the EPA, EPD uses a default f_{oc} value of 0.002 (0.2%) as specified in Equation 10 (default parameter definition) of the *United States EPA Soil Screening Guidance: User's Guide (July 1996)*. The f_{oc} value of 0.02 cited in Table 3 of Georgia's Rules for Hazardous Site Response Chapter 391-3-19 (Rules) refers to the derivation of the soil-to-air volatilization factor in the RAGs equation Part B.

The following table presents approved EPD-calculated Soil Screening Level (SSL) values for each regulated substance released at the site. The values were calculated using a default dilution attention factor (DAF) of 20 and input parameters provided in Tables K-6a and K-6b.

Y900

EPD Approved SSL Values					
Site Contaminant	T1/T3 SSL	T2 SSL	T4 SSL	Overall Cs	Rationale
	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	
1,1,1-TCA	1.4E+00	1.9E+01	1.7E+02	1.7E+02	
1,1,2-TCA	3.2E-02	1.6E-02	5.5E-02	5.5E-02	
1,1-DCE	5.0E-02	7.2E-01	6.8E+00	6.8E+00	
1,4-Dioxane	2.1E-02	2.4E-02	8.2E-02	8.2E-02	
cis-1,2-DCE	4.1E-01	9.4E-01	5.9E+00	5.9E+00	
Chloroform	4.4E-01	1.1E-02	3.7E-02	4.4E-01	T1/T3>T4
Ethylbenzene	1.6E+01	3.4E-01	1.2E+00	1.6E+01	T1/T3>T4
Isopropylbenzene (Cumene)	1.6E-01	6.9E+00	6.2E+01	6.2E+01	
Methylene chloride	2.5E-02	2.8E-01	9.2E-01	9.2E-01	
Naphthalene	1.3E+00	9.2E-02	3.2E-01	1.3E+00	T1/T3>T4
PCE	4.5E-02	1.2E-02	4.0E-02	4.5E-02	T1/T3>T4
Toluene	1.4E+01	1.2E+01	8.8E+01	8.8E+01	
TCE	1.8E+00	1.8E+00	1.8E+00	1.8E+00	EPD approved 01/19/2007
Xylene	2.0E+02	1.2E+00	1.1E+01	2.0E+02	T1/T3>T4

Please note Tables K3 and K4 must be revised to include these values.

Schedule

- Your proposal to submit a copy of the proposed Uniform Environmental Covenant for the qualifying property and list of names/contact information for adjoining properties with tax parcel ID numbers with the completed VRP and Application is acceptable.
- Your proposal to submit a copy of a current title report for the qualifying property with the completed VRP and Application is acceptable.
- EPD requests the submittal of a financial assurance instrument for the amount of \$400,112 by no later than June 28, 2010. Model financial assurance instruments can be located at http://www.gaepd.org/Files_PDF/forms/hwb/HSIModel.pdf.

EPD hereby provisionally accepts Thermo King into the Voluntary Remediation Program pursuant to the January 29, 2010 VRP and Application. If you have any questions, please contact Kristen Ritter Rivera of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Mark Smith, Chief
 Land Protection Branch

c: David Sordi, Ingersoll Rand
 Rhonda N. Quinn, MACTEC