



ecology and environment, inc.

Global Environmental Specialists

700 South Palafox Street, Suite 100

Pensacola, Florida 32502

Tel: (850) 435-8925, Fax: (850) 435-9135

December 4, 2015

Mr. Ben Lightsey
Groundwater Assessment and Remediation Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, Mississippi 39225

Re: Enpro Industries Former Holley Automotive Site, Water Valley, Mississippi, Remedial System Work Plan in Response to Mississippi Department of Environmental Quality (MDEQ) Letters Dated August 21 and October 30, 2015.

Dear Mr. Lightsey:

Ecology and Environment, Inc. (E & E), on behalf of Mr. Joe Wheatley of EnPro Industries, Inc. (formerly Coltec Industries), has prepared the attached Remedial System Work Plan (Attachment A) for the Former Holley Automotive Site located in Water Valley, Mississippi. The Work Plan was prepared in response to your letters dated August 21, 2015 and October 30, 2015 (included in Attachment A). The Work Plan has been signed and sealed by an engineer licensed in the State of Mississippi.

The attached Remedial System Work Plan focuses on retrofitting the Remedial System No. 2 in preparation for restarting the system to meet the updated USEPA Ambient Water Quality Criteria (AWQC) standard for TCE for the discharge of treated groundwater into Otoucalofa Creek.

Remedial System No. 2 was designed to collect and treat contaminated groundwater that may potentially enter Otoucalofa Creek. However, based on recent surface water data, Otoucalofa Creek is not currently being impacted by site groundwaters. Therefore, E & E is proposing to make the system fully operational and obtain the required NPDES permit. If surface water samples from the creek exhibit TCE concentrations exceeding the AWQC for two consecutive semiannual sampling events, the Remedial System No. 2 will be activated for the protection of the creek.

The MDEQ letter from August 2015, and reiterated in the October 2015 letter, also requested a new groundwater well network to treat potential source areas. A windshield survey conducted in October 2015 confirmed that no private wells were noted on properties in the vicinity of the plume; properties are connected to the city water supply. It is our understanding that no residential or commercial properties utilize site groundwater and therefore there are no receptors of the groundwater. As there are no receptors for the site groundwater, human health is not being adversely impacted by the groundwater. E&E is proposing to continue site monitoring for natural attenuation with no additional wells added to the existing network at this time. As noted in the attached Remedial System Work Plan, this may be re-evaluated once the results from the Vapor Intrusion Study are reviewed.



Please feel free to call me at (850) 435-8925 or by email at selliott@ene.com if you have any questions or comments regarding the attached Remedial Work Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Elliott", with a stylized flourish at the end.

Steven Elliott
Project Manager, E & E

Attachments

cc: Joe Wheatley, Enpro
John Fazzolari, E & E
Neil Brown, E & E



Attachment A

**Remedial System Work Plan
for the
Former Holley Automotive Site
Water Valley MS**



Remedial System Work Plan
for the
Former Holley Automotive Facility
Water Valley Mississippi

December 2015

Prepared for:

Enpro Industries

Charlotte, North Carolina

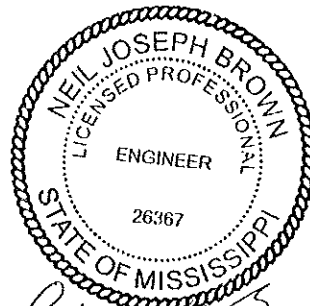
Prepared by:

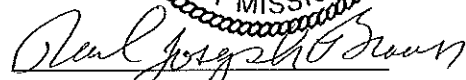


PROFESSIONAL ENGINEER CERTIFICATION PAGE

I hereby certify that this Remedial System Work Plan for the former Holley Automotive Facility located in Water Valley Mississippi was prepared by me or under my direct personal supervision and that I am a duly licensed Professional Engineer under the laws of the State of Mississippi. I have reviewed this document in sufficient depth to accept full responsibility for its contents and to assure code compliance and coordination.

Name: Neil Joseph Brown
License Number: 26367
State: Mississippi
Expiration: December 31, 2016




Neil Joseph Brown

12-2-15
Date

Site and System Background

The Former Holley Automotive Facility has two groundwater treatment systems with a total of five recovery wells. The recovery wells were installed along the leading edge of the trichloroethene (TCE) plume with the objective of providing hydraulic control and mass removal. Recovery wells RW-1, RW-2, and RW-3 are piped underground to Remedial System No. 1, which is enclosed in a building located adjacent to RW-1. Recovery wells RW-4 and RW-5 are piped underground to Remedial System No. 2 located in a building adjacent to RW-4 (see Attachment 1). Remedial System No. 1 and Remedial System No. 2 utilize packed air stripping towers for groundwater treatment prior to discharging previously to the Otoucalofa Creek under National Pollutant Discharge Elimination System (NPDES) permit number MS0045641.

Currently, the location of the recovery wells utilized by Remedial System No. 1 are not ideal for contaminated groundwater recovery and will not be part of this Work Plan. Remedial System No. 2 and recovery wells RW-4 and RW-5 provides sufficient coverage of the northern boundary of the TCE plume, just south of the Otoucalofa Creek. It should be noted that surface water samples taken from the creek have only had intermittent detections of TCE historically. In addition, TCE has not been detected in surface water samples collected over the past three sampling events. However, based on current remedial system location and configuration, Remedial System No. 2 will be modified and prepared for use as described in further sections of this Work Plan.

In addition to this Work Plan, a vapor intrusion (VI) study work plan for the site has been submitted to the MDEQ for their review. Once approved, the VI study will be conducted. Once the results the VI results have been obtained and analyzed, the need for modifications, beyond what is proposed in this work plan, will be evaluated.

Work Plan Objectives

The objective of this Work Plan is to retrofit Remedial System No. 2 in preparation for its use to meet the updated USEPA Ambient Water Quality Criteria (AWQC) standard for TCE (0.6 µg/L, revised from 2.5 µg/L in June 2015) for the discharge of treated groundwater into Otoucalofa Creek.

Remedial System No. 2 Modifications

During its operation, Remedial System No. 2 reduced recovered groundwater concentrations of TCE to below laboratory method detection limits prior to discharge. Remedial System No. 2 was shutdown several years ago due to fouling of recovery well lines and the buildup of sediment in the towers. It was also suspected that the recovery system was actually drawing the plume toward the creek.

Prior to restarting Remedial System No. 2, the system will need to be modified and retrofitted to accommodate new components (such as discharge pump, tower pump, recovery well pumps, new

tower float modules and controls, new discharge meter, and some interior plumbing). A process flow diagram is shown in Figure 1. Additionally, programming of the system controls will be performed to optimize the towers efficiency.

It is anticipated recovery wells RW-4 and RW-5 will continue to be utilized by Remedial System No. 2.

System Restart

Following completion of system modifications and retrofitting, Remedial System No. 2 will be temporarily restarted. During the restart, influent and effluent treatment samples will be collected for analysis of volatile organic compounds (VOCs) using United States Environmental Protection Agency (USEPA) Method 8260 and additional parameters required by the NPDES permit application (i.e. pH, TSS). This will aid in determining the effectiveness of the modifications and the system as a whole. Effluent TCE concentrations should be below applicable criteria (AWQC) for discharge into Otoucalofa Creek. Treated effluent will be stored on-site in above tanks and/or drums of sufficient size to accommodate the restart procedures. Upon receipt of analytical results, the treated effluent will be shipped off-site to an appropriately licensed treatment disposal facility.

Following evaluation of the analytical results and receipt of the renewed the NPDES permit, Remedial System No.2 will be available to be restarted for the protection of Otoucalofa Creek when surface water TCE concentrations in the creek indicate a need for the system (i.e. concentrations exceed the AWQC for two consecutive sampling events).

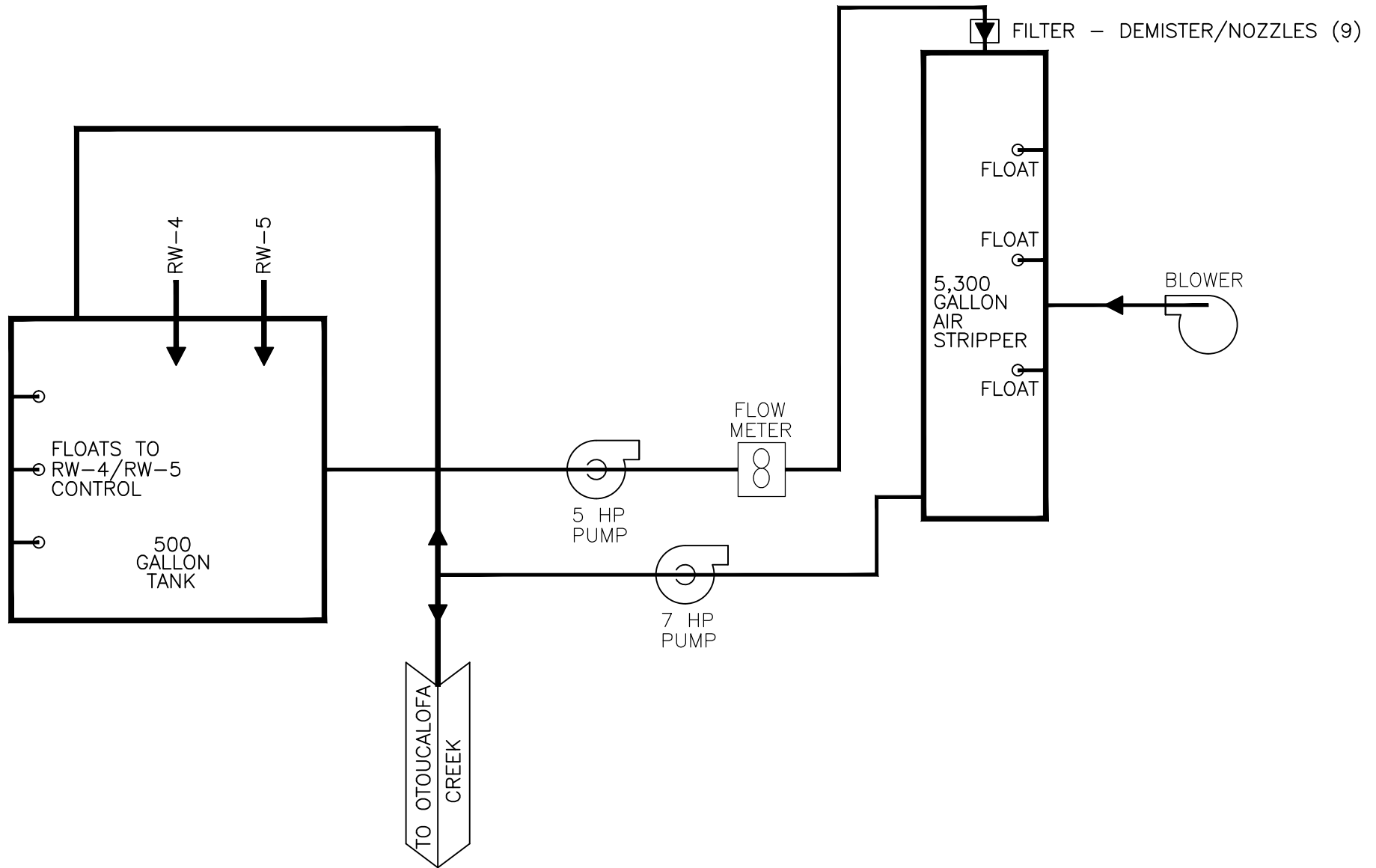
NPDES Permit


The system previously operated under NPDES permit MS0045641, while discharging treated water to the Otoucalofa Creek. Due to shutdown of the treatment system, the NPDES permit expired. Discharge Monitoring Reports continue to be submitted monthly reflecting a “zero discharge” status. Prior to restarting the system permanently, the NPDES will be reapplied for. Results from the effluent samples will be used to prepare the NPDES permit renewal forms.

Schedule

Based on the modifications and retrofitting of Remedial System No. 2 startup date, startup of the treatment system, collection and analysis of analytical results, and application of the NPDES permit, E & E anticipates the Work Plan can be completed by July 2016. This is completion date is contingent upon receipt of the renewed NPDES permit. MDEQ will be notified of changes to the schedule.

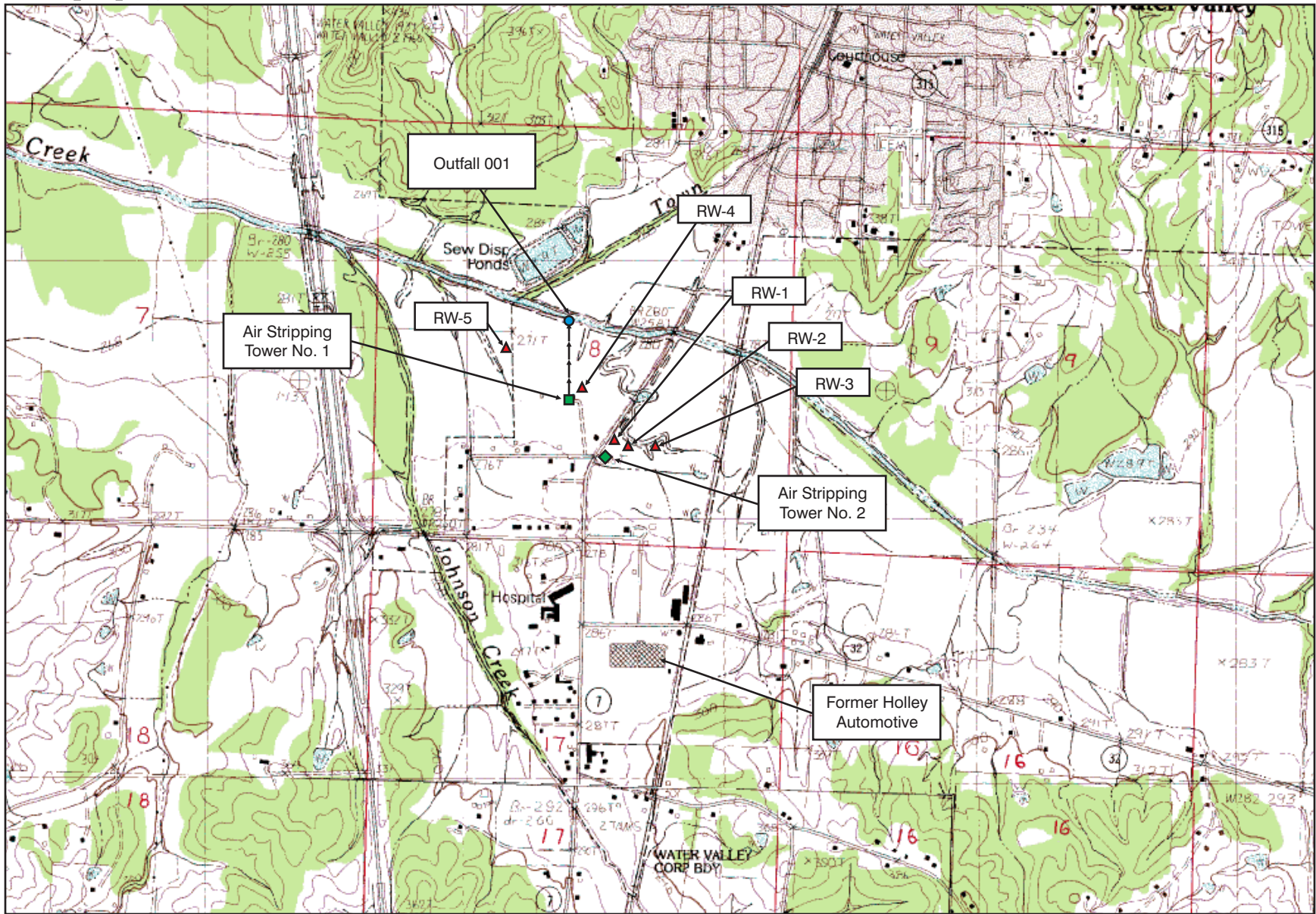
Figure 1 – Process Flow Diagram



 ecology and environment, inc. Tallahassee, Florida Global Environmental Specialists	
FIGURE 1 PROCESS FLOW DIAGRAM (OCTOBER 2015) WATER VALLEY ?, ?, FLORIDA	
JOB#: 1002554.0001.01	Date: OCTOBER 2015
File Name: Figure 1.dwg	P.M.: E. MEYERS

Attachment 1

Site Topographical Map



SOURCE: Ecology and Environment, Inc., 2014

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Approximate Scale



Attachment 2

MDEQ Letter Dated August 21, 2015



STATE OF MISSISSIPPI

PHIL BRYANT
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

GARY C. RIKARD, EXECUTIVE DIRECTOR

August 21, 2015

Mr. Joe Wheatley
EnPro Industries, Inc.
5605 Carnegie Boulevard
Charlotte, NC 28209-4674

Re: "Response to Mississippi Department of Environmental Quality (MDEQ)
Letter Dated September 9, 2014", dated January 19, 2015
Colt Industries Holley Carburetor Site
Water Valley, Mississippi (Yalobusha County)

Dear Mr. Wheatley:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced document prepared by Ecology and Environment, Inc. (E &E) on behalf of EnPro Industries, Inc. We appreciate your response and apologize for the delay in addressing the letter. As you are aware, due to individual project officers leaving our division and agency to pursue other career opportunities over the last few months this site has changed hands a number of times. We are confident those issues have been appropriately handled and we can begin moving forward once again.

MDEQ is aware that the groundwater extraction and treatment system for the facility has been offline for a considerable period of time due to maintenance issues which will now require substantial repair to bring the system back into service. Since its shutdown, MDEQ has made verbal and written requests to bring the system back on-line. MDEQ never issued a concurrence or approval for the system shutdown and the continued lapse in treatment, nor have we made any statements releasing any parties from that obligation.

At this time, MDEQ formally requires submission of a work plan to restart the system and propose a revised recovery well network, detailing the installation of additional well locations and construction details to maximize contaminant recovery efforts, on or before September 30, 2015. This plan must be approved, signed and sealed by a Professional Engineer or Registered Professional Geologist certified to perform this work in the State of Mississippi.

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

Mr. Joe Wheatley
August 21, 2015
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During the review of records for this facility, site investigations to date demonstrate that the associated groundwater contamination plume has not been vertically delineated. It would be appropriate to address the vertical delineation in the requested work plan, but may be separated into an individual vertical delineation work plan, if you deem that necessary.

In the September 5, 2014 request, MDEQ required a vapor intrusion work plan be submitted to this office for review and approval. A response was provided in your January 19, 2015 letter which proposed collecting three soil gas samples adjacent to MW-44, an area on county owned property which access rights have already been established in order to simplify the process. MDEQ cannot approve the proposed Vapor Intrusion Evaluation Work Plan as written. While it may be beneficial to collect soil gas samples in the area of MW-44 since it is an area with high contaminant groundwater concentrations, this plan significantly misses the mark for a secondary screening evaluation. The plan makes no efforts to identify potentially affected structures present over the footprint of the groundwater plume, identifying "at risk" structures. While MDEQ concurs, when justified, that a multiple lines of investigation approach is appropriate by demonstrating a completed pathway to a structure prior to collecting indoor air samples, your proposal fails to recommend any near-slab soil gas results for **any** potentially affected structures within the footprint of the groundwater plume. It would be poor professional judgment to believe that three soil gas samples collected in one specific location could be utilized to determine the outcome of a soil gas investigation for a plume at least 0.8 miles in length. Soil heterogeneity alone is too inconsistent for those samples to be of value for an evaluation of any structure more than 100 feet away.

At this time, MDEQ additionally requires a separate Vapor Intrusion Work Plan be submitted on or before September 30, 2015, detailing a staged approach to collect near-slab soil gas samples installed as permanent points adjacent to a mix of commercial and residential structures in place over the footprint of the groundwater plume, followed by concurrent indoor and ambient air sampling should soil gas concentrations exceed acceptable regulatory screening levels. The MDEQ expects soil gas sampling locations in proximity to sensitive receptors (i.e. residences, hospital, etc.) as well as areas of known high concentration. This plan must be approved, signed and sealed by a Professional Engineer certified to perform this work in the State of Mississippi.

The MDEQ approved the abandonment of monitoring wells MW-4, MW-8S, MW-8D, MW-19, and MW-20 in a comment letter dated September 5, 2014. Through telephone conversation with E & E, the MDEQ understands that the monitoring wells have not been plugged and abandoned. The method of abandonment proposed in your letter does not meet the criteria established by our agency for closure of the monitoring wells. MDEQ requires removal of the well casing and screen to the extent practical. After that, the remaining borehole

Mr. Joe Wheatley
August 21, 2015
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should be tremied from the bottom up with bentonite grout. Capping with asphalt at the surface to match the surrounding area is acceptable. MDEQ asks that these wells be properly abandoned according to the manner prescribed when the new recovery wells (required in first paragraph) are installed.

MDEQ approved the site to be placed on a semi-annual sampling schedule with the next event scheduled for September 2015. The MDEQ has no record of the March 2015 event or corresponding Groundwater Monitoring Report (GMR). Please submit the March 2015 GMR to this office for review. Semi-annual groundwater reports are to be submitted to this office within 60 days of the sampling event.

In correspondence dated April 17, 1998, MDEQ informed the Environmental Protection Agency (EPA) that Colt Industries had been admitted to into MDEQ's Voluntary Evaluation Program which would allow MDEQ to oversee the assessment and remediation of this site. Due to the groundwater remediation system being shut down for the past year or more and the issuance of EPA's Office of Solid Waste and Emergency Response's (OSWER) Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air (publication 9200.2-154), MDEQ will be conducting a Reassessment of this site in the upcoming months. This Reassessment will evaluate current site conditions and complete a Hazard Ranking System (HRS) score for EPA's National Priorities List.

Should you find that the items requested require significant discussion, you can request a meeting at our office to discuss site conditions and the path forward at your earliest convenience. Otherwise, questions or comments can be directed to me at (601) 961-5731 or project manager Ben Lightsey at (601) 961-5166.

Sincerely,



William G. McKercher, P.E.
Branch Chief
Groundwater Assessment and
Remediation Division – GARD I

cc: Trey Hess, P.E. – MDEQ GARD
Ben Lightsey – MDEQ GARD
Steven Elliot – Ecology and Environment, Inc.
John Fazzolari – Ecology and Environment, Inc.

Attachment 3

MDEQ Letter dated October 30, 2015



STATE OF MISSISSIPPI
PHIL BRYANT
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
GARY C. RIKARD, EXECUTIVE DIRECTOR

October 30, 2015

Mr. Joe Wheatley
EnPro Industries, Inc.
5605 Carnegie Boulevard
Charlotte, NC 28209-4674

Re: Response to MDEQ Letter Dated August 21, 2015
dated September 29, 2015
Colt Industries Holley Carburetor Site
Water Valley, Mississippi (Yalobusha County)

Dear Mr. Wheatley:

The Mississippi Department of Environmental Quality (MDEQ) has reviewed the above referenced document prepared by Ecology and Environment, Inc. (E&E) on behalf of EnPro Industries, Inc. The review has generated the following comments:

1. The MDEQ requires a minimum two-weeks' notice prior to conducting any field activities related to remediation or assessment of the site.
2. EnPro Industries, Inc. requested for a 30-day extension for submittal of the Vapor Intrusion Evaluation Work Plan, moving the deadline to October 29, 2015. In conversation today with Steven Elliott of E&E, MDEQ was notified that E&E was behind schedule and the Vapor Intrusion Evaluation Work Plan will be submitted by November 5, 2015.
3. Our letter dated August 21, 2015 stated "... MDEQ formally requires submission of a work plan to restart the system and propose a revised recovery well network, detailing the installation of additional well locations and construction details to maximize contaminant recovery efforts, on or before September 30, 2015." Upon review of the DRAFT Remedial System Work Plan provided with your letter, it appears that E&E has only addressed bringing System 2 online, operating recovery wells RW-4 and RW-5. Although MDEQ strongly supports bringing this system back online, the proposal falls far short of proposing a revised recovery well network to maximize contaminant recovery efforts. As discussed in the field with Elliott during groundwater sampling activities, MDEQ expects to

Mr. Joe Wheatley
October 30, 2015
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see a plan that revises the recovery well network with additional system(s) as required addressing the body of the plume, particularly in areas exhibiting higher risk of exposure. A Final plan should be submitted for review and approval on or before December 4, 2015.

Any questions or comments can be directed to me at (601) 961-5731 or project manager Ben Lightsey at (601) 961-5166.

Sincerely,



Benjamin B. Lightsey
Project Manager
Groundwater Assessment and
Remediation Division – GARD



William G. McKercher, P.E.
Branch Chief
Groundwater Assessment and
Remediation Division – GARD

cc: Steven Elliot, Ecology and Environment, Inc. [via e-mail only]