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September 20, 2017

Mr. William McKercher
Mississippi Department of Environmental Quality
515 E. Amite Street
Jackson, MS 39201

Mr. Ben Lightsey
Mississippi Department of Environmental Quality
515 E. Amite Street
Jackson, MS 39201

Re: Proposal for Indoor Air Sampling Schedule Changes
Former Holley Automotive/Coltec Industries Facility, Water Valley, MS

Dear Messrs. McKercher and Lightsey:

Pursuant to Section 3.A. of the Agreed Order entered on September 11, 2017, First Environment, Inc. ("First Environment"), on behalf of EnPro Industries, Inc. ("EnPro"), is submitting this request for a modification to the indoor air sampling frequency and sampling locations at the former Holley Automotive/Coltec Industries Facility (the "Plant"). Section 3.A. of the Agreed Order requires that EnPro submit an indoor air sampling plan proposing a schedule for continued indoor air monitoring within ten (10) days of the date of the Order. This request is submitted in compliance with and prior to the deadline established therein.

New Jersey
California
Georgia
Illinois
Mississippi
New York
Puerto Rico
Canada

The results of the last five rounds of indoor air sampling show that trichloroethene ("TCE") was below USEPA's Vapor Intrusion Screening Level ("VISL") of 3 µg/m^3 at the following eight sampling locations: IA-C16; IA-L16; IA-G13; IA-B12; IA-K13; IA-K8; IA-D5; IA-G4. A comparison table of the indoor air sampling results for TCE is attached. Based on these results, First Environment requests a semi-annual indoor air sampling schedule for three of those eight sampling locations: IA-C16, IA-K13, and IA-G4. These three sampling locations are at the west, center, and east of the Plant, respectively, and thus are representative of the Plant indoor air conditions.

Additionally, the indoor air samples in the interior rooms continue to show a decreasing trend in TCE concentrations. First Environment requests a bi-weekly indoor air sampling schedule for the four interior room indoor air sampling locations: IA-1, IA-2, IA-6, and IA-17.

In the event that there are material disruptions to the SSDS, First Environment will notify the MDEQ and, within a week of the disruption, perform indoor air sampling at the seven indoor air sampling locations (IA-C16, IA-K13, IA-G4, IA-1, IA-2, IA-6, and IA-17). Material disruptions will not include power outages for less than a day, minor scheduled maintenance, or scheduled remedial work.

A figure of the proposed three semi-annual indoor air sampling locations and four bi-weekly indoor air sampling locations is attached. First Environment will also sample ambient air at sampling location AA-2 concurrently with each indoor air sampling event.

Based on a continuing review of sampling results or other conditions that EnPro determines are likely to affect indoor air conditions (such as changes to the mitigation system or structural changes to the building), EnPro may propose appropriate changes to this sampling plan in the future.

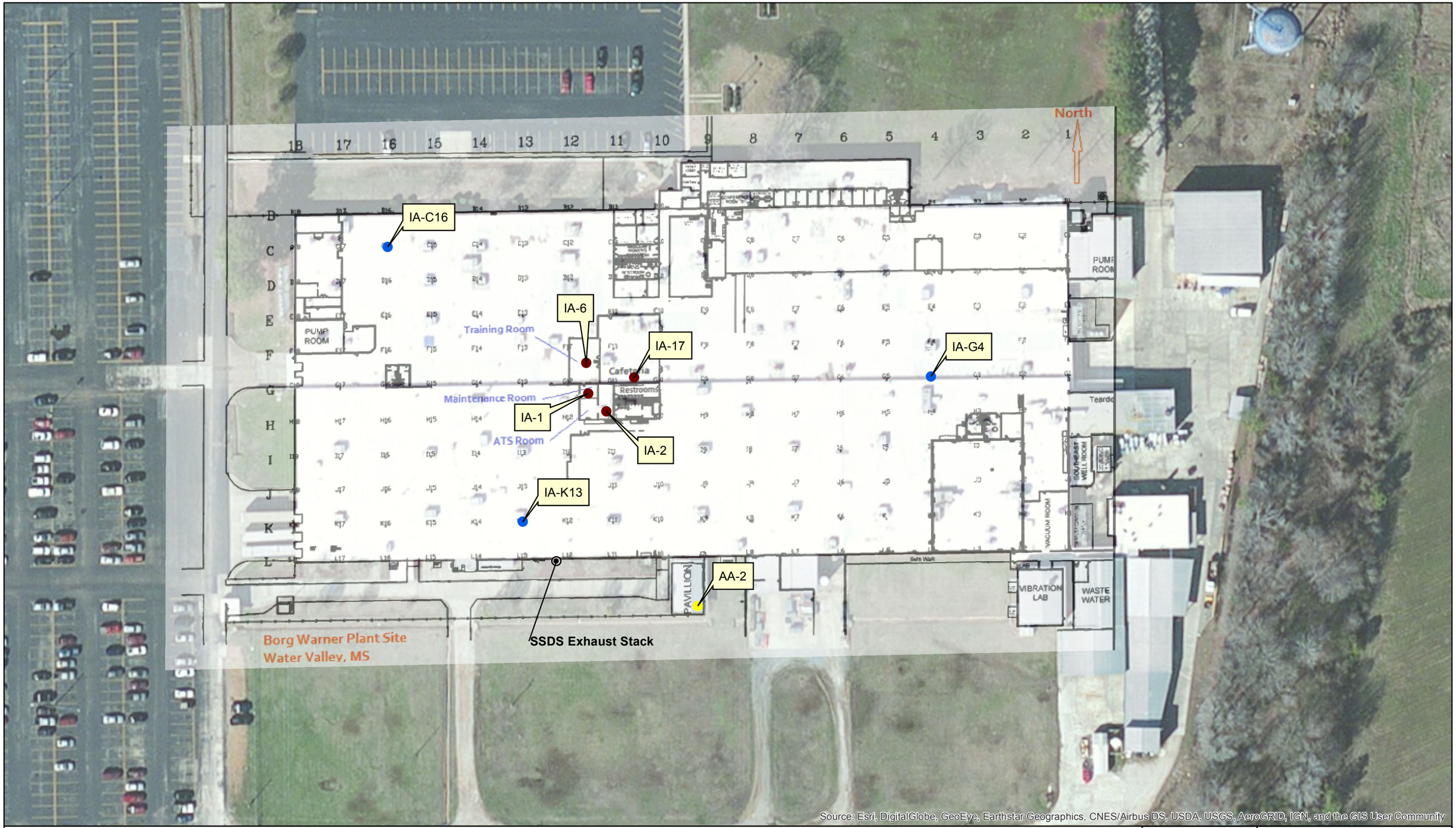
Very truly yours,

FIRST ENVIRONMENT, INC.

Bernard T. Delaney, Ph.D., P.E., BCEE
President

cc: Trudy Fisher, Esq.
Benne Hutson, Esq.
Amanda Tollison, Esq.

ATTACHMENTS



Legend

- IA-1: Proposed Bi-Weekly Indoor Air Sampling
- IA-C16: Proposed Semi-Anual Indoor Air Sampling
- AA-2: Ambient Air Sampling

0 20 40 80 Feet

1 inch = 80 feet

FIRST ENVIRONMENT

91 Fulton Street
Boonton, New Jersey 07005

BORG WARNER FACILITY
600 Highway 32E, Water Valley, MS

FIGURE 1

PROPOSED INDOOR AIR SAMPLING LOCATIONS

Revised	Drawn	Checked	Approved	Date
	LS	IC	NMT	9/14/17

INDOOR AIR SAMPLING RESULTS COMPARISON
JANUARY THROUGH AUGUST 2017
FORMER HOLLEY AUTOMOTIVE/COLTEC INDUSTRIES FACILITY
WATER VALLEY, MS

SAMPLE ID	SAMPLING DATE	LABORATORY ID	CoC Concentrations (µg/m³)		
			Trichloroethene	cis-1,2-Dichloroethene	Vinyl chloride
USEPA Vapor Intrusion Screening Level (VISL):			**3**	NA	**2.8**
IA-1	19-Jan-17	L1702183-01	268(D)	63.8	<0.051
	15-Feb-17	L890396-01	55.8	<0.793	2.51
	23-Feb-17	L892423-01	150	82.1	1.68
	9-Mar-17	L895061-01	425	97.9	2.47
	26-Mar-17	L898762-01	103	11.4	0.604
	26-Apr-17	L905292-01	78.3	<0.793	0.712
	14-May-17	L909544-01	72.7	14	<0.511
	25-May-17	L912423-03	219	<0.793	0.526
	7-Jun-17	L914832-13	41.7	<0.793	<0.511
	19-Jun-17	L917924-13	29.4	3.68	<0.511
	28-Jun-17	L920054-12	21.4	<0.793	<0.511
	21-Jul-17	L924410-01	23.8	<0.793	<0.511
	4-Aug-17	L927407-01	22.9	2.85	<0.511
	15-Aug-17	L930026-01	20.6	<0.793	<0.511
IA-2	19-Jan-17	L1702183-02	187	43.2	<0.051
	15-Feb-17	L890396-02	97.1	<0.793	2.27
	23-Feb-17	L892423-02	157	79.4	1.57
	9-Mar-17	L895061-02	426	86.7	1.18
IA-2 (2ND CANISTER)	9-Mar-17	L895061-04	438	88.7	1.68
	26-Mar-17	L898762-02	61.8	<0.793	<0.511
IA-2 (DUPLICATE)	26-Mar-17	L898762-04	82.3	<0.793	<0.511
	26-Apr-17	L905292-02	56.6	10.8	<0.511
	14-May-17	L909544-02	10.8	<0.793	<0.511
	25-May-17	L912423-08	160	<0.793	<0.511
	7-Jun-17	L914832-12	6.58	<0.793	<0.511
	19-Jun-17	L917924-12	8.16	1.88	<0.511
	28-Jun-17	L920054-13	4.21	<0.793	<0.511
	21-Jul-17	L924410-02	4.3	<0.793	<0.511
	4-Aug-17	L927407-02	2.94	<0.793	<0.511
	15-Aug-17	L930026-02	2.91	<0.793	<0.511
IA-6	19-Jan-17	L1702183-06	39	12.8	0.585
	15-Feb-17	L890396-03	21.7	<0.793	0.57
	23-Feb-17	L892423-03	47.1	14.2	<0.511
	9-Mar-17	L895061-03	48.6	12.3	0.511
	26-Mar-17	L898762-03	25.8	<0.793	<0.511
	26-Apr-17	L905292-03	26	9.12	<0.511
	14-May-17	L909544-03	19.5	<0.793	<0.511
	25-May-17	L912423-01	19.1	<0.793	<0.511
	7-Jun-17	L914832-11	5.75	<0.793	<0.511
	19-Jun-17	L917924-11	6.67	4.14	<0.511
	28-Jun-17	L920054-11	4.84	<0.793	<0.511
	21-Jul-17	L924410-03	4	<0.793	<0.511
	4-Aug-17	L927407-03	<1.07	<0.793	<0.511
	15-Aug-17	L930026-03	7.61	<0.793	<0.511
IA-14	19-Jan-17	L1702183-14	3.07	0.928	<0.051
	23-Feb-17	L892423-04	3.32	<0.793	<0.511
IA-17	14-May-17	L909544-05	13.5	<0.793	<0.511
	25-May-17	L912423-02	4.15	<0.793	<0.511
	7-Jun-17	L914832-10	3.96	<0.793	<0.511
	19-Jun-17	L917924-10	4.82	4.48	<0.511
	28-Jun-17	L920054-10	3.56	<0.793	<0.511
	21-Jul-17	L924410-04	3.27	<0.793	<0.511
	4-Aug-17	L927407-04	3.02	<0.793	<0.511
	15-Aug-17	L930026-04	<5.36	<3.96	<2.56
IA-B12	26-Apr-17	L905292-04	6.54	1.77	<0.511
	25-May-17	L912423-05	3.08	<0.793	<0.511
	7-Jun-17	L914832-07	1.64	<0.793	<0.511
	19-Jun-17	L917924-09	1.66	<0.793	<0.511
	28-Jun-17	L920054-08	<1.07	<0.793	<0.511
	21-Jul-17	L924410-05	1.08	<0.793	<0.511
	4-Aug-17	L927407-05	<1.07	<0.793	<0.511
	15-Aug-17	L930026-05	<1.07	<0.793	<0.511
IA-C16	26-Apr-17	L905292-05	6.48	1.82	<0.511
	25-May-17	L912423-06	3.88	<0.793	<0.511
	7-Jun-17	L914832-08	1.55	<0.793	<0.511
	19-Jun-17	L917924-07	2	<0.793	<0.511
	28-Jun-17	L920054-07	1.22	<0.793	<0.511
	21-Jul-17	L924410-06	1.08	<0.793	<0.511
	4-Aug-17	L927407-06	1.25	<0.793	<0.511
	15-Aug-17	L930026-06	<1.07	<0.793	<0.511
IA-D5	25-May-17	L912423-12	<1.07	<0.793	<0.511
	7-Jun-17	L914832-03	1.47	<0.793	<0.511
	19-Jun-17	L917924-03	1.66	<0.793	<0.511
	28-Jun-17	L920054-03	<1.07	<0.793	<0.511
	21-Jul-17	L924410-08	<1.07	<0.793	<0.511
	4-Aug-17	L927407-10	<1.07	<0.793	<0.511
	15-Aug-17	L930026-10	<1.07	<0.793	<0.511
IA-G4	25-May-17	L912423-11	<1.07	<0.793	<0.511
	7-Jun-17	L914832-02	3.31	<0.793	<0.511
	19-Jun-17	L917924-02	1.35	<0.793	<0.511
	28-Jun-17	L920054-02	<1.07	<0.793	<0.511
	21-Jul-17	L924410-09	<1.07	<0.793	<0.511
	4-Aug-17	L927407-11	<1.07	<0.793	<0.511
	15-Aug-17	L930026-11	<1.07	<0.793	<0.511

INDOOR AIR SAMPLING RESULTS COMPARISON
JANUARY THROUGH AUGUST 2017
FORMER HOLLEY AUTOMOTIVE/COLTEC INDUSTRIES FACILITY
WATER VALLEY, MS

SAMPLE ID	SAMPLING DATE	LABORATORY ID	CoC Concentrations (µg/m³)		
			Trichloroethene	cis-1,2-Dichloroethene	Vinyl chloride
USEPA Vapor Intrusion Screening Level (VISL):			**3**	NA	**2.8**
IA-G13	26-Apr-17	L905292-06	8.98	<0.793	<0.511
	14-May-17	L909544-04	4.65	<0.793	<0.511
	25-May-17	L912423-06	3.88	<0.793	<0.511
	7-Jun-17	L914832-06	2.54	<0.793	<0.511
	19-Jun-17	L917924-06	2.46	<0.793	<0.511
	28-Jun-17	L920054-06	1.41	<0.793	<0.511
	21-Jul-17	L924410-07	1.6	<0.793	<0.511
	4-Aug-17	L927407-07	1.76	<0.793	<0.511
	15-Aug-17	L930026-07	1.25	<0.793	<0.511
IA-K8	25-May-17	L912423-10	1.47	<0.793	<0.511
	7-Jun-17	L914832-01	7.86	<0.793	<0.511
	19-Jun-17	L917924-01	1.31	<0.793	<0.511
	28-Jun-17	L920054-01	<1.07	<0.793	<0.511
	21-Jul-17	L924410-10	<1.07	<0.793	<0.511
	4-Aug-17	L927407-12	<1.07	<0.793	<0.511
	15-Aug-17	L930026-12	<1.07	<0.793	<0.511
IA-K13	26-Apr-17	L905292-07	6.53	<0.793	<0.511
	25-May-17	L912423-04	5.28	<0.793	<0.511
	7-Jun-17	L914832-05	1.59	<0.793	<0.511
	19-Jun-17	L917924-05	2.2	<0.793	<0.511
	28-Jun-17	L920054-05	1.33	<0.793	<0.511
	21-Jul-17	L924410-12	1.34	<0.793	<0.511
	4-Aug-17	L927407-08	<1.07	<0.793	<0.511
	15-Aug-17	L930026-08	<1.07	<0.793	<0.511
IA-L16	26-Apr-17	L905292-08	5.77	1.75	<0.511
	7-Jun-17	L914832-04	2.09	<0.793	<0.511
	25-May-17	L912423-09	1.36	<0.793	<0.511
	19-Jun-17	L917924-04	2.81	<0.793	<0.511
	28-Jun-17	L920054-04	1.32	<0.793	<0.511
	21-Jul-17	L924410-11	1.18	<0.793	<0.511
	4-Aug-17	L927407-09	<1.07	<0.793	<0.511
	15-Aug-17	L930026-09	1.13	<0.793	<0.511
EP-1	14-May-17	L909544-06	1420000	361000	46300
EP-2	14-May-17	L909544-07	2820000	560000	13200
IA-SUMP-DUP	25-May-17	L912423-15	83.1	<0.793	<0.511
IA-SUMP	19-Jun-17	L917924-14	5.33	1.19	<0.511
	28-Jun-17	L920054-14	3.75	<0.793	<0.511
AA-1	19-Jan-17	L1702183-17	<0.107	<0.079	<0.051
AA-2	19-Jan-17	L1702183-18	0.129	<0.079	<0.051
	26-Apr-17	L905292-09	<0.107	<0.793	<0.051
	25-May-17	L912423-13	<1.07	<0.793	<0.511
	7-Jun-17	L914832-09	<1.07	<0.793	<0.511
	19-Jun-17	L917924-08	<1.07	<0.793	<0.511
	28-Jun-17	L920054-09	16.7	<0.793	<0.511
	21-Jul-17	L924410-13	<1.07	<0.793	<0.511
	4-Aug-17	L927407-13	<1.07	<0.793	<0.511
	15-Aug-17	L930026-13	<1.07	<0.793	<0.511
IA-ATS-2ND F	15-Aug-17	L930026-14	1.86	<0.793	<0.511
IA-OFFICE 2ND F	15-Aug-17	L930026-15	<1.07	<0.793	<0.511

D: Concentration of analyte was quantified from diluted analysis. Flag only applies to field samples that have detectable concentrations of the analyte
VISL: Calculated based on USEPA's OSWER Vapor Intrusion Assessment VISL Calculator Version 3.4, November 2015 RSLs for Target Indoor Air Concentration @ TCR=1E-6 or THQ=1
TCR: Target Carcinogen Risk
THQ: Target Hazard Quotient for Non-Carcinogens