

October 11, 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: Air Permit Evaluation Sampling Schedule, Former Holley Automotive/Coltec Industries Facility, Water Valley, MS

Dear Messrs. McKercher and Lightsey:

As you are aware, on September 11, 2017, First Environment, Inc. ("First Environment"), on behalf of EnPro Industries, Inc. ("EnPro"), submitted a letter to the Mississippi Department of Environmental Quality ("MDEQ") regarding an evaluation of the air emissions from the sub-slab depressurization system ("SSDS") emission stack at the Former Holley Automotive/Coltec Industries Facility, Water Valley, Mississippi (the "Plant") in order to determine the need for a State of Mississippi Air Pollution Control Permit. First Environment concluded that, based on the June 2017 and July 2017 effluent sampling results and the continued decrease in the emissions of trichloroethene ("TCE") vapors, an air permit is not needed.

New Jersey

California

Georgia

Illinois

Mississippi

New York

Puerto Rico

Canada

On October 4, 2017, the MDEQ responded that "the results from the analytical sample collected during the evaluation [in July] are promising," but the agency needed additional samples. As was also mentioned in the October 4<sup>th</sup> letter, additional samples of the influent and effluent could indicate that the Ultraviolet (UV) control device on the system discharge is no longer needed. MDEQ requested that a "series of analytical samples be collected pre-control and top of stack post-control that can address both the concentration trend to support the Air Permit Evaluation as well as evaluate the effectiveness of the UV treatment system/control device for the treatment of TCE."

To address the MDEQ's requests, First Environment proposes four rounds of bi-weekly sampling of the influent and effluent of the SSDS, which includes an air pollution control unit (i.e., the ultraviolet air processing unit, Sanuvox UV Bio-Wall Quattro). First Environment will close the intake control valve on the roof of the Plant so that no outside ambient air will influence the sampling results. As discussed with MDEQ, First Environment will leave open the ambient air extraction system intake valve located in the ATS room, which is part of the SSDS' treatment system. First Environment will schedule the four rounds of sampling to coincide with the indoor air sampling schedule as follows.



Proposed Air Permit Evaluation Sampling Dates

- 10/19/17 - 10/20/17
- 11/02/17 - 11/03/17
- 11/16/17 - 11/17/17
- 11/30/17 - 12/01/17

Please note that these sampling dates are subject to the continued receipt of reasonable access rights to the Plant.

If you have any questions regarding the indoor air sampling schedule, please do not hesitate to contact me.

Very truly yours,

FIRST ENVIRONMENT, INC.



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

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