

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: Sub-Slab Depressurization System Effectiveness Evaluation
Former Holley Automotive/Coltec Industries Facility, Water Valley, MS

Dear Messrs. McKercher and Lightsey:

On behalf of EnPro Industries, Inc., First Environment, Inc. (First Environment) is submitting this proposal to evaluate the effectiveness of the Sub-Slab Depressurization System (SSDS) at former Holley Automotive/Coltec Industries Facility located in Water Valley, Mississippi (the "Plant").

Since the installation of the SSDS interim remedial measure, completed in May 2017, First Environment has continually assessed and evaluated the indoor air concentrations related to contaminants of concern (COCs) throughout the Plant, particularly in the Maintenance Room area where indoor air sampling results indicate levels above USEPA's Vapor Intrusion Screening Level (VISL) for TCE of $3 \mu\text{g}/\text{m}^3$ but below the MDEQ action level of $26 \mu\text{g}/\text{m}^3$. Based on the assessment activities, the sump area, located adjacent to the Maintenance Room's west wall (the "Existing Sump Area"), has been identified as a potential source area for the continued sampling results exhibiting exceedances of the VISL in the Maintenance Room. Documented historical features and activities occurring in the Existing Sump Area indicate that this area once included ASTs and piping associated with the former degreasers.

Preliminary evaluations of the Existing Sump Area have revealed that the near sub-slab areas have a high moisture content, indicating that the sump may be compromised (i.e., leaking) and/or may be a continued source of moisture in the subsurface region. This continued source of moisture may impact the overall efficiency of the adjacent SSDS Extraction Point (EP No. 3) and the EP No. 3's ability to draw an effective vacuum in this area.

To address this potential impact, First Environment has agreed with BorgWarner to relocate the Existing Sump Area to a new permanent location (the "New Sump Area") at the south wall of the Plant, adjacent to the existing SSDS blower building. Installation of the New Sump Area is expected to take approximately eight (8) to ten (10) weeks.

New Jersey

California

Georgia

Illinois

Mississippi

New York

Puerto Rico

Canada



With respect to the Existing Sump Area, First Environment proposes to conduct activities to measure the effectiveness of the SSDS prior to, during, and after construction of the New Sump Area. These activities will include the following:

- First Environment will install six (6) temporary sampling ports, approximately one inch in diameter, to a depth a few inches below the six-inch thick concrete slab (within the underlying aggregate/fill material) to conduct head-space analysis utilizing a PID (ppb RAE) and moisture measurements of the sub-surface soil directly beneath the slab. The locations of the proposed sampling ports are depicted in Figure 1. Between analysis and measurement events, the ports will be sealed with a grout material to allow access to the sampling ports on subsequent events (i.e., holes will be re-drilled into grout material).
- First Environment will evaluate the void spaces in the cinder-block wall separating the Existing Sump Area and the Maintenance Room.
- First Environment will evaluate the results in connection with the potential design and subsequent implementation of additional sub-slab remedial measures to address the continued presence of residual TCE vapor in the Maintenance Room.

Upon completion of the assessment of the Existing Sump Area, First Environment will submit a report to the MDEQ and recommended next steps for the Existing Sump Area.

Please note that pursuant to the Agreed Order entered on September 11, 2017, First Environment is evaluating long-term remedial technologies for the COC source areas at the Plant. This evaluation will be included in the Corrective Action Work Plan submitted to the MDEQ on November 10, 2017.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

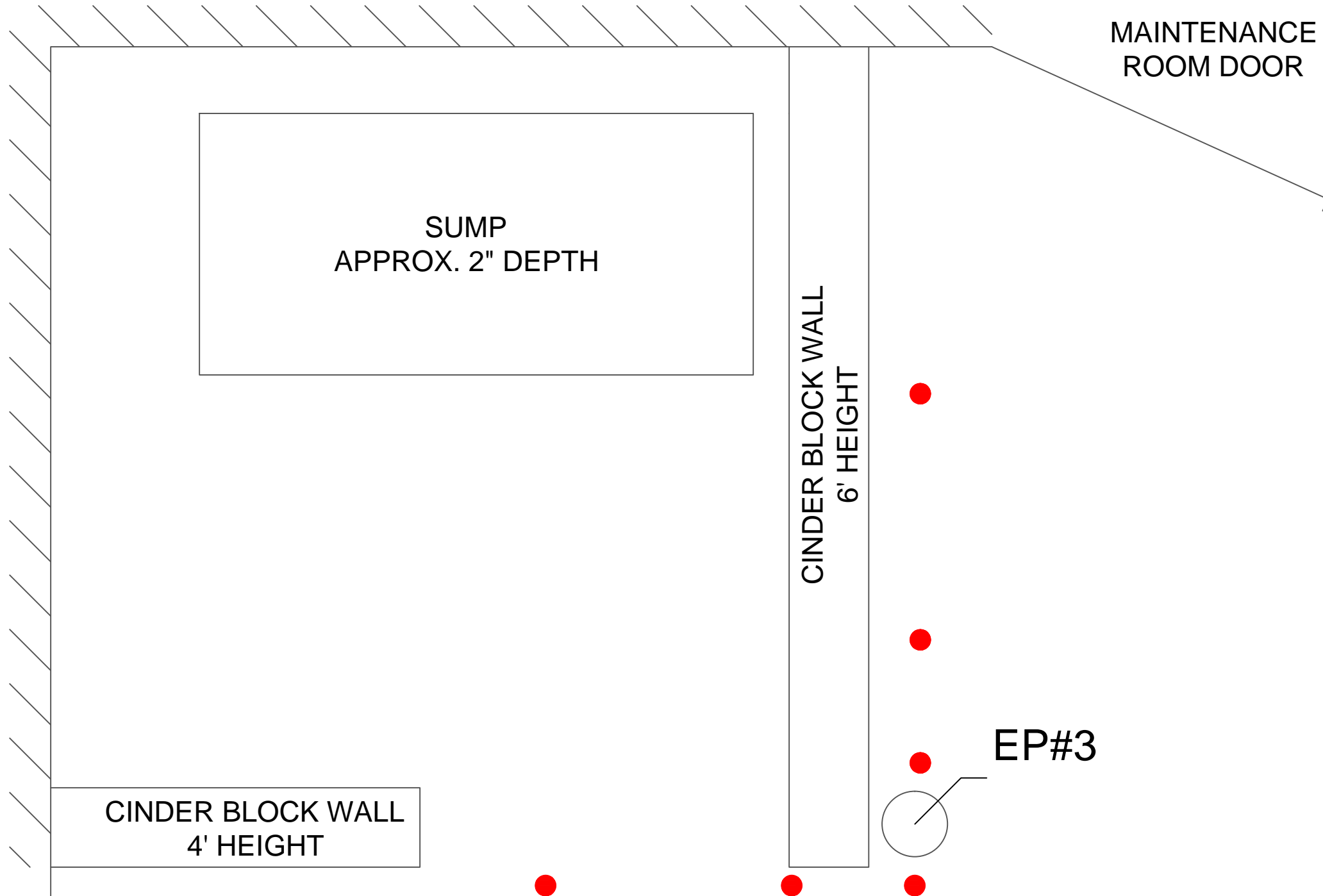
FIRST ENVIRONMENT, INC.



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

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

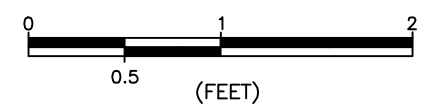
FIGURES



LEGEND

● PROPOSED SAMPLING LOCATION

SCALE



BORG WARNER FACILITY
600 HIGHWAY 32E
WATER VALLEY MISSISSIPPI

PROPOSED SAMPLING LOCATIONS

FIGURE 1	REVISED:	LS	DRAWN:	LS	CHECKED:	IC
	DATE:	9/27/2017	SCALE:	AS SHOWN	DATE:	9/27/2017