

November 9, 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) submits this workplan 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 Sub-Slab Depressurization System (SSDS) interim remedial measure at the Former Holley Automotive/Coltec Industries Facility (the "Plant"), First Environment has continually assessed and evaluated the indoor air concentrations related to contaminants of concern (COCs) throughout the Plant. In the Maintenance Room area, 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  $26 \mu\text{g}/\text{m}^3$  for more than four (4) months. 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 these results. 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 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 EP No. 3's ability to draw an effective vacuum in this area.

To address this potential impact, First Environment will be relocating 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. Borg Warner has agreed with this sump relocation. Installation of the New Sump Area is expected to take approximately eight (8) to ten (10) weeks. The sump relocation activities are depicted in the building plan and equipment detail in Attachment A and will include the following:

New Jersey

California

Georgia

Illinois

Mississippi

New York

Puerto Rico

Canada



- **Building Construction:** An insulated exterior building, approximately 8' x 12', to house the new sump will be constructed. The sump building will be located adjacent (west side) to the newly constructed SSDS blower building. During construction, soil disturbance will be kept to a minimum related to the forming of the building's foundation. Any disturbed soils will be utilized for grading and leveling. Furthermore, during construction, all workers will utilize appropriate personal protective equipment (PPE) in accordance with BorgWarner's and the contractor's health and safety requirements and procedures.
- **Liner:** Prior to construction of the building's floor pad, a geomembrane liner (gas vapor membrane) consisting of high-density poly-ethylene (HDPE) sheets, or equivalent, will be installed.
- **Access-Building:** The sump will be accessed through the former AST door located on the Plant's south wall. The door will be removed, thus creating an opening to access the sump building. The door opening will be 6' in width, thus allowing adequate access for the Plant's floor cleaning equipment, for example.
- **Utilities and equipment:** A new sump, associated pump, water lines, fire suppression measures, electrical installation (e.g., lighting), and a wastewater return line (tied-in to the Plant's existing wastewater treatment system) will be installed during construction. The sump will be approximately 6" deep, 2' wide, and 5' long and will include curbing for spill prevention. The wastewater return line will be activated with a float switch, including a visual and audible high-water level alarm.

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 (1") in diameter, to a depth a few inches below the 6" thick concrete slab (within the underlying aggregate/fill material) to conduct head-space analysis utilizing 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 in the Maintenance Room.

Upon completion of the investigation and assessment of the Existing Sump Area and pursuant to the Agreed Order entered on September 11, 2017, First Environment will be evaluating long-term remedial technologies for the COC source areas at the Plant, which includes the Existing Sump Area. 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,

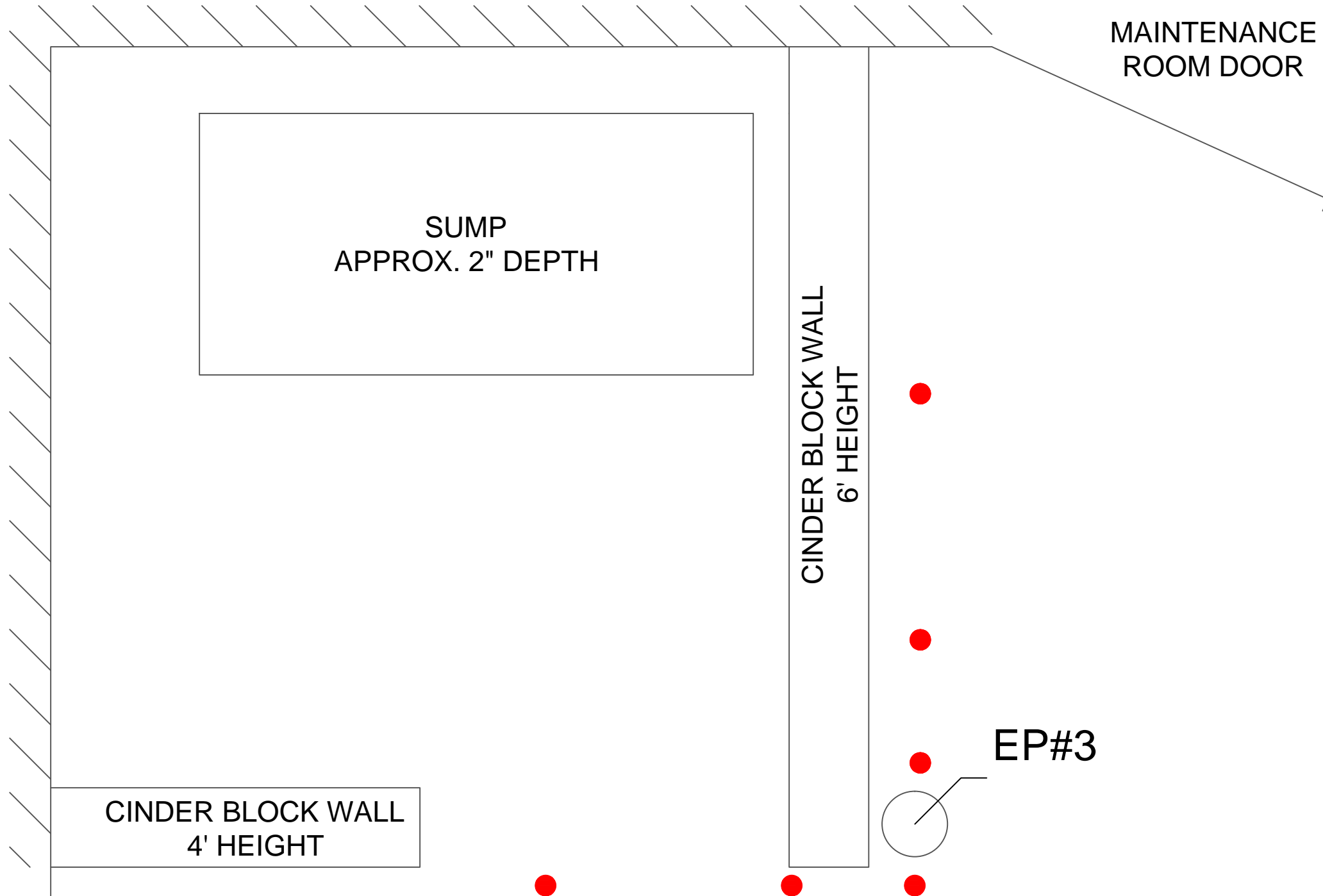
FIRST ENVIRONMENT, INC.

A handwritten signature in black ink, appearing to read "Bernard T. Delaney". The signature is written in a cursive style with a large, looping initial 'B'.

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

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

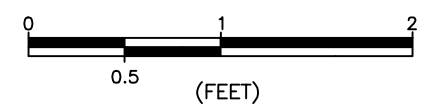
## FIGURES



LEGEND

● PROPOSED SAMPLING LOCATION

SCALE

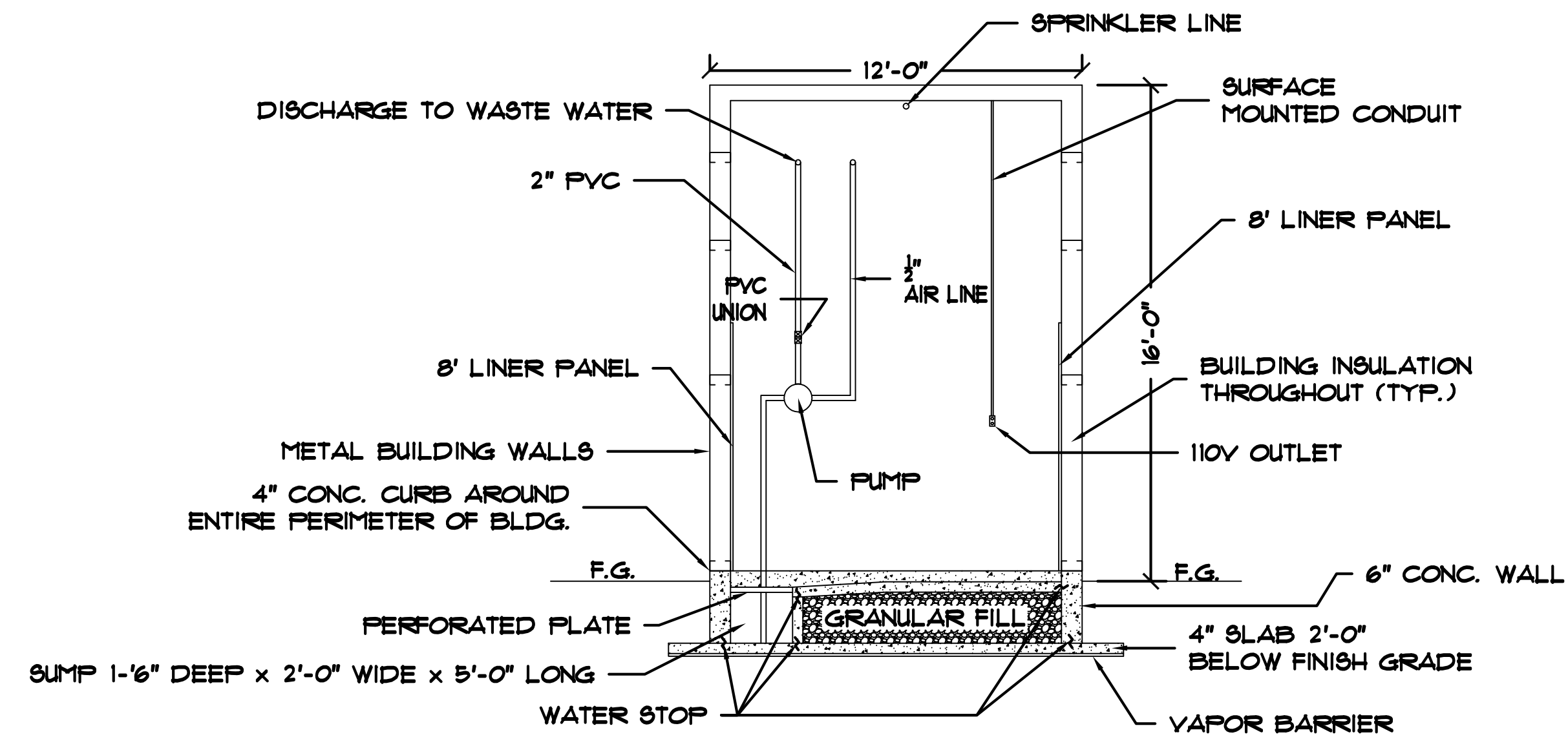


BORG WARNER FACILITY  
600 HIGHWAY 32E  
WATER VALLEY MISSISSIPPI

PROPOSED SAMPLING LOCATIONS

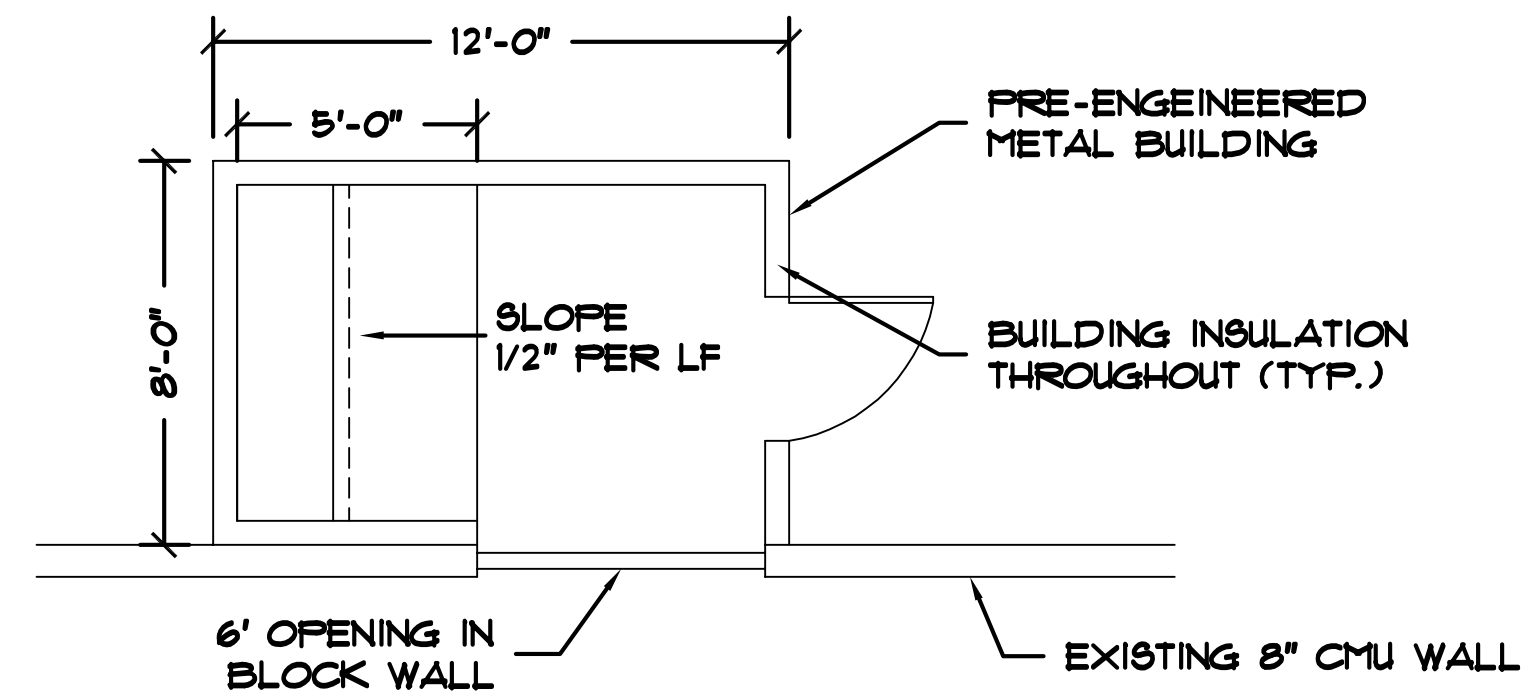
FIGURE 1	REVISED:	LS	DRAWN:	LS	CHECKED:	IC
	DATE:	9/27/2017	SCALE:	AS SHOWN	DATE:	9/27/2017

REVISIONS:



### EQUIPMENT DETAIL

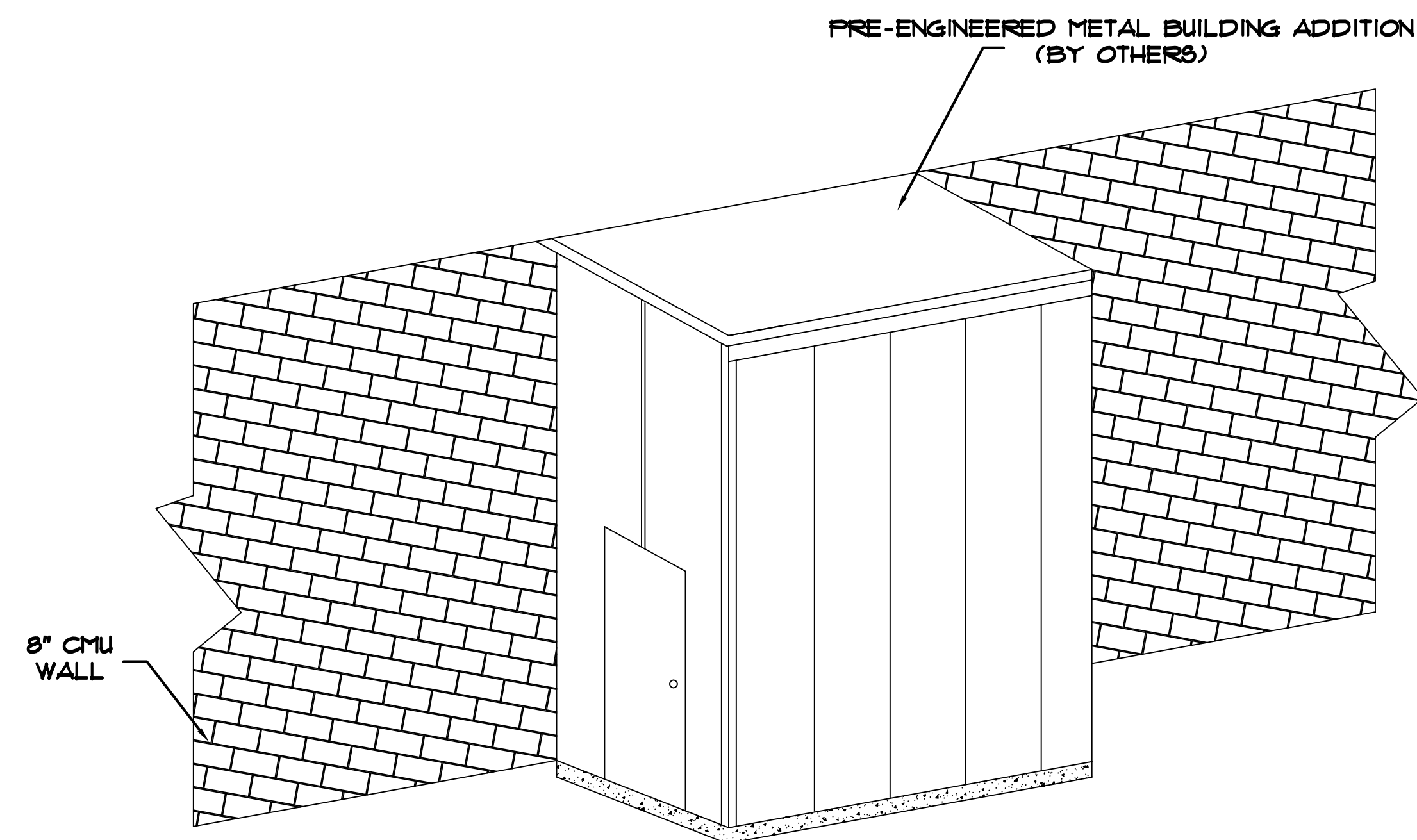
SCALE: 1/4" = 1'-0"



### OVERALL LAYOUT

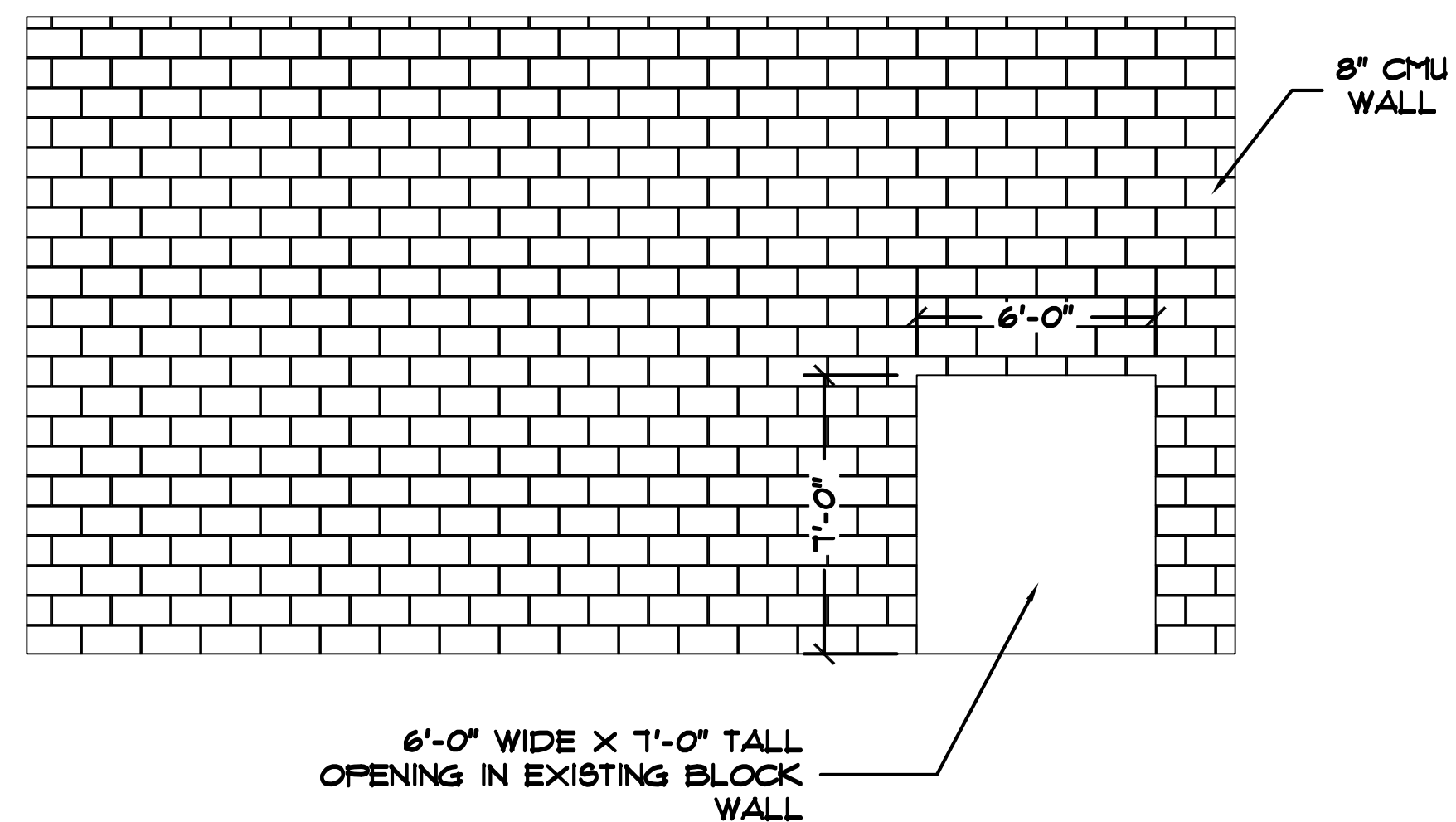
SCALE: 1/4" = 1'-0"

THESE PLANS ARE FOR GENERAL CONSTRUCTION USE AND ARE NOT ENGINEERED.



### MTL BLDG ISOMETRIC

SCALE: N.T.S. (FOR VISUAL PURPOSES ONLY)



### CMU WALL OPENING

SCALE: 1/4" = 1'-0"

DATE: 09/27/17  
 LAST CHANGE: 11/02/17

**AVANT CONSTRUCTION INC.**  
 1185 CR 97  
 WATER VALLEY, MS 38965  
 662-473-2366

SHEET:  
 B1.0