Sub-Slab Depressurization System Progress Report for the Former Holley Automotive/ Coltec Industries Facility Water Valley, Mississippi

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FIRST ENVIRONMENT

CERTIFICATION STATEMENT

I, Bernard T. Delaney, Ph.D., P.E., BCEE, certify that I am currently a registered professional engineer in the State of Mississippi and had primary direct responsibility for the implementation of the subject interim remedial measure activities. I certify that this Sub-Slab Depressurization System Progress Report was completed in conformance with the laws and regulations of the State of Mississippi. I certify that all information and statements in this certification form are true.

11041	01/12/2018	
Mississippi Professional Engineer No.	Date	B. Tod Delaney, Ph.D., P.E., BCEE

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1.0 Introduction

This Sub-Slab Depressurization System ("SSDS") Progress Report has been prepared by First Environment, Inc. ("First Environment") on behalf of EnPro Industries, Inc. ("EnPro") with respect to the former Holley Automotive/Coltec Industries Facility (hereinafter referred to as the "Plant"). The Plant is located at 600 State Highway 32 in Water Valley, Yalobusha County, Mississippi.

On June 19, 2017, First Environment submitted a VI Investigation and Mitigation Report (the "Initial SSDS Report"), which included a description of the SSDS and indoor air sampling data through June 7, 2017. On July 3, 2017, First Environment submitted an SSDS Progress Report on the June 19-20, 2017 ambient and indoor air sampling results and the installation of extraction point ("EP") No. 3. First Environment submitted SSDS Progress Reports on subsequent rounds of ambient and indoor air sampling on July 17, August 7, August 21, September 11, October 2, October 9, October 17, November 1, November 15, November 29, December 13, 2017, and January 8, 2018.

On December 28-29, 2017, First Environment collected a round of ambient and indoor air samples from the four interior rooms at the Plant—the Training Room, ATS Room, Maintenance Room, and Cafeteria.

2.0 Indoor Air Monitoring – December 28-29, 2017

2.1 Instrumentation

On December 28-29, 2017, First Environment collected ambient and indoor air samples by placing laboratory provided 6-liter capacity 24-hour Summa® canisters equipped with flow regulators calibrated to 24 hours.

2.2 Methodology

First Environment collected four indoor air samples at the four interior rooms of the Plant, and one ambient air sample outside the Plant. Standard chain-of-custody procedures were implemented for the sampling, including signing the sample lot in and out from the facility to the laboratory on a chain-of-custody sheet and dating the start and end dates/times of sample collection. First Environment also followed standard indoor air sampling techniques to collect the indoor air samples at the locations depicted in Figure 1. Wherever possible, First Environment mounted the Summa® canisters on columns or secured them in an area above the

floor at or near the “breathing space.” The vacuum measurements in Summa® canisters were noted before and after sampling to ensure that the flow regulator at each canister was working properly.

The sampling requires the Summa® canisters to be left in place for 24 hours and they are monitored by Plant security for that period of time. First Environment personnel, Borg Warner representatives, and Plant employees had access to the Summa® canisters during the 24-hour sampling period.

First Environment submitted the samples to ESC Lab Sciences for USEPA TO-15 SIM analysis. The laboratory was responsible for the decontamination of the Summa® canisters and for setting the internal vacuum and calibrating the regulators prior to sample collection.

2.3 Results

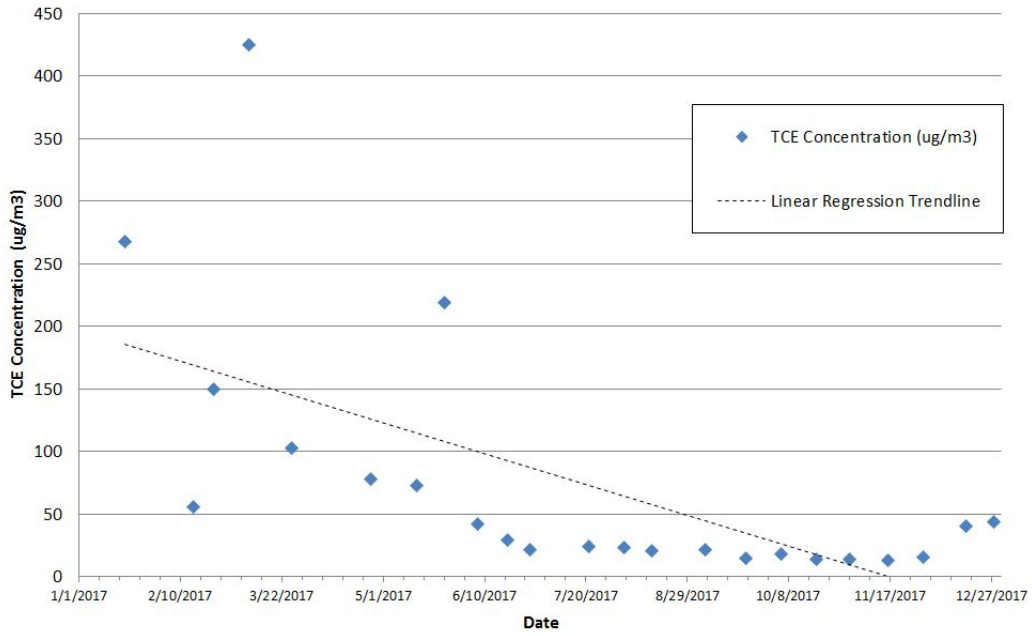
Table 1 presents the ambient and indoor air sampling results for all TO-15 analytes. Table 2 presents the results of TCE, cis-DCE, and VC in comparison of all previous rounds of sampling. A copy of the laboratory report, including the chain-of-custody forms, is attached in Appendix A.

The sample results in the ATS Room and Cafeteria were below USEPA’s Vapor Intrusion Screening Level (“VISL”) for TCE of 3 µg/m^3. The sample results in the Training Room were above USEPA’s VISL but below the MDEQ action level of 26 µg/m^3. The sample results in the Maintenance Room were above the MDEQ action level of 26 µg/m^3.

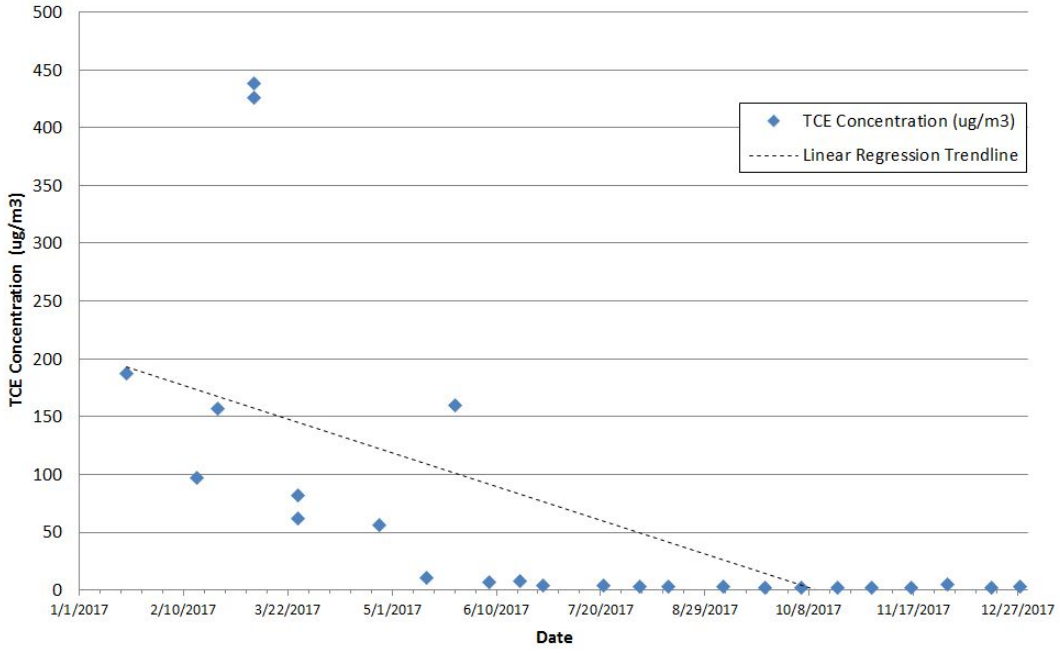
This sampling event occurred during First Environment’s continued evaluation of the current (active) sump area, including removing the plugs in the cinder block wall between the sump and the Maintenance Room to take PID readings utilizing a calibrated PID (ppb RAE – ppbRAE3000 – PGM740). Additionally, during this time period, plumbing associated with the Maintenance Room and the sump was being rerouted as part of the sump relocation activities. The canisters were collected before First Environment sealed the void spaces in the concrete wall between the existing sump and the Maintenance Room, as reported in the January 8, 2018 SSDS Progress Report.

The following figures show the linear regression trendline for the interior rooms.

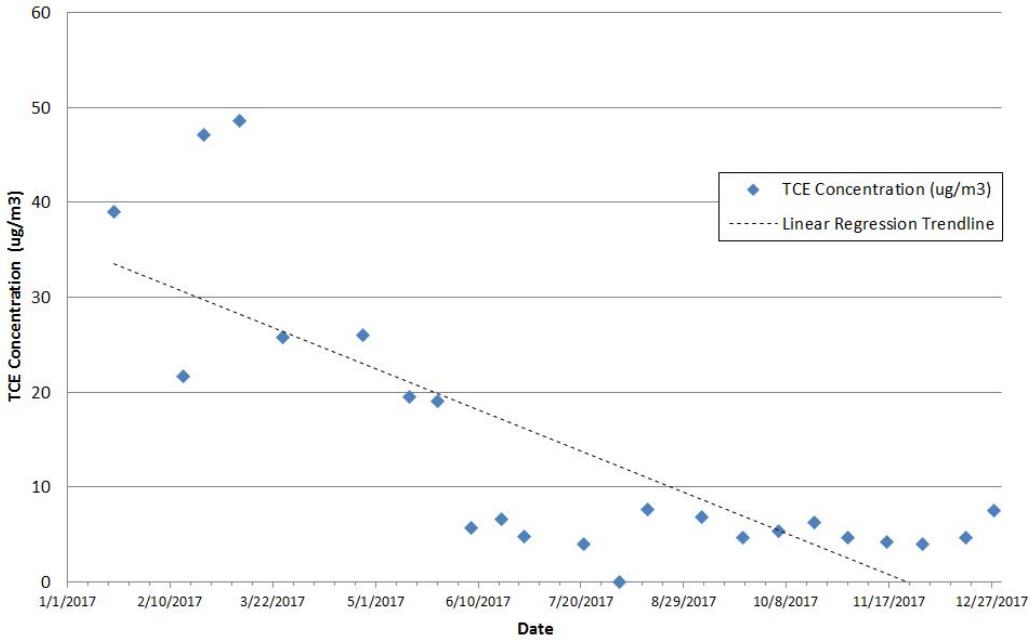
TCE Concentration History at IA-1 (Maintenance Room)



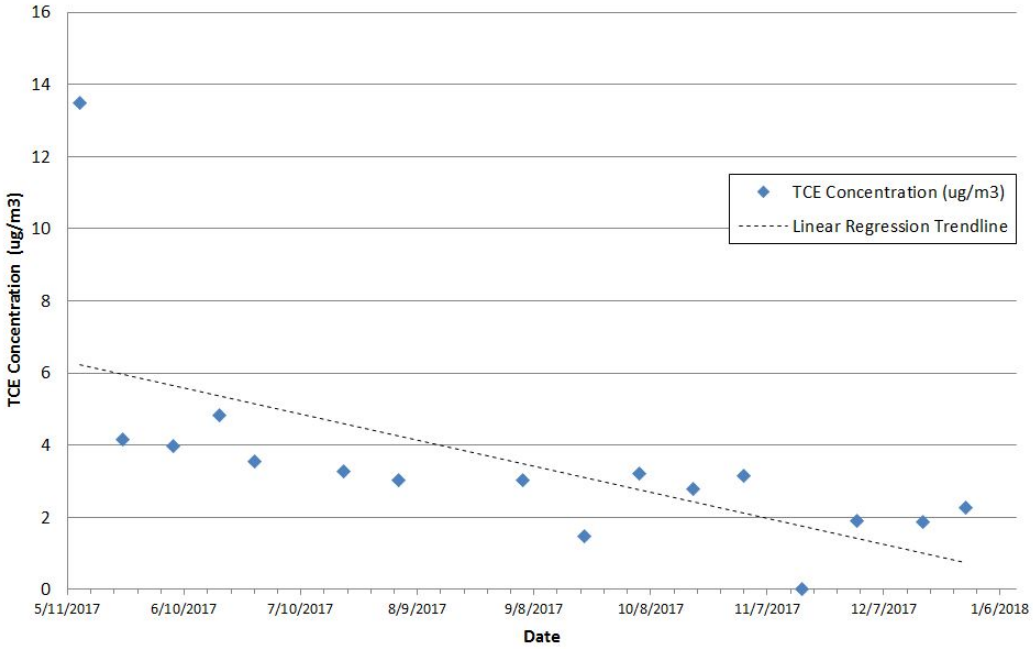
TCE Concentration History at IA-2 (ATS Room)



TCE Concentration History at IA-6 (Training Room)



TCE Concentration History at IA-17 (Cafeteria)



3.0 Summary of Indoor Air Sampling

Since June 2017, the sample results in the ATS Room (IA-2), Training Room (IA-6), and Cafeteria (IA-17) have been below the MDEQ action level of 26 µg/m^3. As previously explained, the elevated concentration of TCE in the Maintenance Room (IA-1) after First Environment performed an evaluation in the sump area confirms that the sump area is acting as a source of vapor intrusion.

On September 20, 2017, First Environment, on behalf of EnPro, submitted a letter request to the MDEQ for modification to the indoor air sampling program pursuant to Section 3.A. of the Agreed Order. The revised indoor air sampling schedule provides for bi-weekly sampling for the four interior room indoor air sampling locations (IA-1, IA-2, IA-6, & IA-17) and semi-annual sampling of three locations at the west, center, and east areas of the Plant (IA-C16, IA-K13, and IA-G4). On September 28, 2017, the MDEQ approved the sampling schedule with a request that IA-C16, IA-K13, and IA-G4 be sampled on a quarterly basis. Accordingly, IA-C16, IA-K13, and IA-G4 will be sampled quarterly. Subsequent indoor air sampling results under the approved sampling schedule will be provided to the MDEQ on an ongoing basis.

4.0 Air Permit Evaluation

On December 13, 2017, First Environment reported the results of the final round of samples from the influent and effluent of the SSDS taken on December 1, 2017. Based on six (6) rounds of effluent sampling results (June 13, July 17, October 20, November 2, November 17, and December 1), First Environment recommended that an air permit for the SSDS emissions is not needed. On December 22, 2017, the MDEQ accepted First Environment's "recommendation in Section 4.0 of the Report [dated December 13, 2017] that an air permit is not needed for the SSDS emissions".

In its December 22, 2017 letter, the MDEQ also concurred "with the conclusion that the ultra-violet processing unit is no longer needed and authorizes the control device to be taken off-line." On December 27, 2017, First Environment disconnected the ultra-violet processing unit. The SSDS with the ultra-violet processing unit removed is depicted below.