

Hazardous Waste Section
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Your Name: Mary Siedlecki
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January 15, 2013

Mr. Larry Petty, President
Petty Machine Company, Inc.
2403 Forbes Road
P.O. Box 1888
Gastonia, North Carolina 28056-3254

Subject: *Revised Site Conceptual Model Report, June 2012* (dated July 31, 2012)
Petty Machine Company, Inc.
Gastonia, North Carolina
NCD 991 278 805

Dear Mr. Petty:

Thank you for submitting the *Revised Site Conceptual Model Report, June 2012*, for the above referenced facility. This document was submitted by your environmental consultant in an email dated September 19, 2012, in response to comments from the Hazardous Waste Section (Section) in correspondence dated March 9, 2012.

The *Revised Site Conceptual Model Report* addresses each of the comments discussed by the Section in their March 2012 correspondence.

Additional data pertinent to the Site Conceptual Model (SCM) have been collected since submittal of the *Revised Site Conceptual Model Report, June 2012*. Therefore, the Section asks that the draft SCM be revised to address the comments listed below and then submitted as one hard copy and two electronic copies within thirty (30) days following receipt of this correspondence.

Although this draft of the SCM will be considered final, the SCM is a model that describes the location and movement of contamination at the facility. Like all models, the SCM may require future revisions as new data are collected and our understanding of site conditions improves. Petty Machine shall submit an updated SCM within sixty (60) calendar days should the Section issue a written request. Petty Machine may also choose to modify or update the SCM of their own accord as new data are collected.

Comments Requiring Revisions to the SCM:

- The *Revised Site Conceptual Model Report, June 2012* discusses proposed sampling of the spent glass beads and the spent garnet polishing media [Sections 8, 9.2, and 9.2.4]. Analytical results for the spent glass beads and spent garnet polishing media have since been collected and are now available.

Although Section 8 does not require revisions, Section 9.2 of the SCM should be revised to include the results of waste characterization and background soil analyses and subsequent actions taken to address these media. Section 9.2.4 should also be revised to indicate that work plans may be developed in the future to address further investigation and/or corrective action.

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- The *Revised Site Conceptual Model Report, June 2012* states that although the source of chromium measured in groundwater collected from MW-11 has not been determined, the extent of contamination appears to be limited [sections 4.7, 9.1 and 9.2.6]. Data supporting this statement are not presented in the SCM. The Section recommends that the SCM be revised to include data supporting this statement or conduct additional assessment activities to collect data either to support or refute this statement.

Comments NOT Requiring Revisions to the SCM:

- The *Revised Site Conceptual Model Report, June 2012* indicates that the adjacent, off-site property owner is reluctant to allow the installation of additional groundwater monitoring wells in order to define the lateral extent of contamination [sections 9.1 and 9.2.8]. Although no changes to the SCM are required at this time, documentation from the adjacent, off-site property owner should be secured by Petty Machine to support this claim. The documentation should be submitted to the Section no later than March 15, 2013.
- The *Revised Site Conceptual Model Report, June 2012*, presents groundwater monitoring data for three groundwater monitoring events, including
 - April 26, 2011;
 - October 26, 2011; and
 - May 22, 2012.

Although the April 26, 2011, groundwater monitoring data are discussed in the context of the SCM; data for the latter two sampling events are tabulated without accompanying discussion or interpretation. The May 22, 2012, groundwater monitoring data should be submitted in standard groundwater monitoring report format. One hard copy and two electronic copies of the report should be submitted no later than February 25, 2013. No changes to the SCM are required.

In summary, the *Revised Site Conceptual Model Report, June 2012* achieved the goals of a site conceptual model. The report compiled all available information and data to describe our current understanding of environmental conditions at the facility. Additionally, the *Revised Site Conceptual Model Report, June 2012* identified data gaps and proposed development of work plans to address those data gaps. Future work plans will be addressed as part of the scope of work described in the Alternate Mechanism in Lieu of Post-Closure Permit, which is currently being developed. A copy of the draft Alternate Mechanism will be submitted to you in 2013 for your review and comment.

If you have any questions or comments, please do not hesitate to contact me at 919-707-8208 or via email at mary.siedlecki@ncdenr.gov.

Sincerely,



Mary Siedlecki
Hazardous Waste Section
Project Manager

cc: Linda Petty, Petty Machine Company, Inc.
Bud McCarty, Hazardous Waste Section Head
Sean Morris, Hazardous Waste Inspector
Al Quarles, S&ME, Inc.