UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4WD-RPB

JUN 17 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Williams
Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

SUBJ: Corrective Measures Study Meeting and Site Visit: May 21, 2003
Grenada Manufacturing Facility
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

Thank you for meeting with the Environmental Protection Agency (EPA) regarding your Corrective Measures Study (CMS), your planned Permeable Reactive Barrier (PRB), various completed Interim Measures (IM) at the Chromium destruct pit and lines, Indoor Air Monitoring and other ongoing HSWA corrective action measures. At this meeting you brought to EPA's attention the fact that U.S. Army Corp of Engineers (COE) permitting for installation of the PRB is almost complete, the archeological study has been completed, and wetlands mitigation agreements are complete. Last month, you furnished EPA with the full Design Basis Report for the PRB for EPA's review. EPA has forwarded this report to its Science and Ecosystem Division (SESD) in Athens, Georgia for review. This review may take up to a month. Comments are not expected from the SESD until July 7, 2003.

At the meeting you reported that because of delays in procuring and storing the necessary iron filings for the PRB (156 railcar loads), you would not be able to begin this project until 2004. As you pointed out, the construction must be done in the 'dry season', which is usually May until October in your area. In addition you will require that all permitting from the COE and all approvals from the EPA are in place before you begin construction. After examining the project schedule that you furnished in the Design Basis Report for the PRB, EPA agrees that, regrettably, this corrective measure cannot be implemented this year.

EPA will, however, require that offsite monitoring of the stream and sediments in Riverdale Creek begin without delay. EPA approves of the parameters and locations of surface water sampling stations in the Design Basis Report and the locations of new groundwater monitoring wells that the facility plans to install prior to implementation of the PRB. Sampling frequency should be changed to quarterly for the surface water monitoring stations; semiannual sampling at groundwater monitoring stations may remain in place at this time. EPA is requiring

the facility to conduct another sediment sampling event in Riverdale Creek prior to beginning construction for the PRB, at the same five (5) locations proposed for surface water sampling. EPA will require the facility to repeat this sampling event at a future date after the PRB has been operational for two years. EPA would prefer that the sediment sampling be initiated between May and October of each event year.

Grenada again informed EPA that NAPL recovery is taking place at AOCs A and B from wells located near the eastern outside wall of the manufacturing building. In addition, MW-2 located near the sludge lagoon has been added to the NAPL recovery program. NAPL recovery has been performed since 1993 at AOCs A and B [MW-25 and MW-24 respectively], but has tapered off in recent years. The area around AOCs A and B has remained contaminated with extremely high levels of Toluene, Trichlorethene, Vinyl Chloride, and cis 1-2 Dichloroethene. Recent analysis of purge water from Monitoring Well 24 (AOC B) resulted in levels of Toluene; 140,000 ug/l [MCL=1000 ug/l] Trichlorethene; 9,750 ug/l [MCL=5 ug/l] Vinyl Chloride; 3,180ug/l [MCL= 2ug/l] and cis 1-2 Dichloroethene; 19,300 ug/l [MCL=7ug/l].

EPA remains concerned about the potential for downgradient contamination from the source area and is encouraging the facility to go forward with new source control measures for the toluene and TCE plumes in the area of AOCs A and B and MW-2. Source control is a condition of both the approved Interim Measures Workplan and the conditionally approved Corrective Measures Workplan. The facility may proceed on its own recognizance with the selection of a technology to replace or augment the existing source control measures as part of the CMS for the final remedy.

EPA's representative visited the clean closed former chromium destruct pit, and the former chrome plating lines, which were closed with waste in place. As part of final certification of closure for the latter, EPA requires appropriate institutional control(s), and a plan for continued monitoring. This plan will be due to EPA ninety (90) days from receipt of this letter.

EPA's representative also visited the indoor air monitoring locations used in February 2003 for indoor air sampling. At the meeting, found levels of indoor air Constituents of Concern (COCs) were reviewed. Of eleven (11) parameters monitored, one (1) Trichloroethene was found above EPA's target indoor air screening concentrations for risk at the 10^{-4} Industrial Risk Level. These values ranged from 0.81 ppb_v to 7.9 ppb_v; the standard is 0.41 ppb_v. However, given the conservative nature of the risk assumptions [based on 24 hour residential exposure, 365 days a year] and the worst case nature of the sampling conditions [winter, all doors and windows closed, ventilation off]: EPA is tentatively concluding that there does not appear to be an indoor air threat arising from groundwater or soil contamination, to the health of workers, at the Grenada Manufacturing facility in Grenada, Mississippi.

EPA's RCRA Compliance & Enforcement Branch is charged with enforcing the Oil Pollution Act (OPA). While at the facility, EPA's representative noted two situations that I would like to bring to your attention. The first was a small, emulsified oil spill near the less than

90 day hazardous waste storage area, and the second was the presence of an oil sheen on rainwater in the secondary containment area of the used oil storage tank located behind the main plant building. Under OPA the facility is required to report oil spills which violate applicable water quality standards; cause a film or "sheen" upon, or discoloration of the surface of the water or adjoining shorelines; or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines. Please see EPA's website at http://www.epa.gov/oilspill/oilreqs.htm to determine if your spills meet the reporting requirements because of the proximity of wetlands, Riverdale Creek or its tributaries.

EPA does not think either of these spills meets the foregoing reporting criteria at this time, but they may have the potential to do so if not removed promptly and are allowed to release offsite or into the surface water. All oil spills or sheens should be removed promptly regardless of size, as there are no size criteria in OPA. You indicated that you would immediately remove the oil spill near the less than 90 day storage area. EPA advises that it would also be prudent to pump out the secondary containment area under the used oil tank so that the full volume of the secondary containment area is available in the event of a major used oil spill. The cleanup materials from each of these removals should be disposed of in a proper manner. Please advise EPA if, and when, you have removed these two oil spills.

Again, thank you for your courtesy and the excellent technical presentations of your consulting staff. If you have any questions or concerns regarding this letter, please contact Mr. Don Webster, your EPA Project Manager, at (404) 562-8469.

Sincerely,

N. M. Kumar

Narindar M. Kumar, Chief
RCRA Programs Branch

cc: Louis Crawford, MDEQ
John Bozick, ArvinMeritor
John Devic, Collins and Aikman
Jeffery Karp, Swidler, Berlin, Shereff, Friedman, LLP
Jeff Pallas, RCRA Compliance & Enforcement Branch

EPA REGION IV RCRA RECORDS TRANSMITTAL FORM

Please DO NOT submit Un-dated material. DO NOT submit Government Financial / Funding Information, including Contract Costs. Please DO NOT submit Duplicate Copies. Please DO submit records to the RCRA Records Center located at the North end of the 10th floor.

TRANSMITTAL DATE: 10/22/03 YOUR NAME: Houston Gilliland

FACILITY NAME: Granada Manufacturing Fac. FACILITY ID#: MSD007037278

DOCUMENT DATE: 6/17/03

DOCUMENT TITLE: Corrective Measures Study Meeting.

DOCUMENT DESCRIPTION (Use RCRA Document Description Table): Site Visit.

ACTION AREA: _____ CONFIDENTIAL: YES _____ NO X.

SPECIAL INSTRUCTIONS: _____

TRANSMITTAL DATE: _____ YOUR NAME: _____