



June 24, 2020

Mr. Curtis A. Phillips
Project Manager
Office of Environmental Remediation
West Virginia Department of Environmental Protection
2031 Pleasant Valley Road
Fairmont, West Virginia 26554

Dear Curtis:

Subject: Response to Comments
Voluntary Remediation Program Application
Former Carr China Manufacturing Facility
Grafton, Taylor County, West Virginia
VRP Project #20019
CEC Project 194-569

On behalf of the Save the Tygart Watershed Association, Inc. (STTWA), Civil & Environmental Consultants, Inc. (CEC) has prepared this letter in response to comments received from the West Virginia Department of Environmental Protection (WVDEP) on June 12, 2020. These comments were related to the Voluntary Remediation Program Application submitted on May 29, 2020 for the former Carr China Manufacturing Facility located in Grafton, Taylor County, West Virginia.

The following presents the comments in **bold** type followed by a response.

- 1. Section 5 – Existing Environmental Information (pdf pg. 9 of 1273): Two USEPA identification numbers (WVN000306608 and 110037286914) were listed, but a third number may have been omitted. The Phase I Site Assessment identified a “Generator EPA ID” number WVP000004342. Please determine if this number should be added to this section. A reference to this number can be found in .pdf page numbers 273 and 353 in the VRP Application.**

RESPONSE: The Generator EPA ID number WVP000004342 has been added to Section 5.

- 2. Section 6 – Remediation Objectives (pdf pg. 10 of 1273): The STTWA plans to operate an office building and a lab on the property, which would qualify as “Commercial” use. Please mark the Commercial check box in this section.**

RESPONSE: In Section 6 – Remediation Objectives, under the Post-Remediation Use section, the applicant had selected “other” to include the future plans for an office building/laboratory.

This is because the future office building/laboratory is not expected to be used by a typical full-time employee, rather will be used as-needed by different members of the watershed group. However, in response to this comment, the “commercial” box has been checked instead of the “other” box. This will allow for a full-time commercial use scenario to be evaluated should the STTWA operations expand in the future to necessitate full-time employees.

3. Section 2 – Site Use (pdf pg. 15 of 1273): Under Future Site Use, please check “Commercial” use as potential Future Site Use.

RESPONSE: Conceptual Site Model Worksheet Section 2 – Site Use, Future Site Use has been revised as requested.

4. Section 2 – Site Use (pdf pg. 15 of 1273): Under Historical Adjacent Property use, please include the railroad right of way along the southern border of the Carr China property. You may check either “Industrial” or “Other” to define the railroad property.

RESPONSE: Conceptual Site Model Worksheet Section 2 – Site Use, Historical Adjacent Property Use has been revised as requested.

5. Section 3 – Contaminant Source Characteristics (pdf pg. 16 of 1273): Under the Sources of Contamination section, please check both Aboveground Storage Tank System (AT) and Adjacent Property Use (AP). There were two large fuel oil ASTs located on the site, as well as the railroad right of way along the southern border of the property. Both the railroad and ASTs are potential sources for the SVOC contamination found on the site during the Phase II Site Assessment. In the Contaminants Table, please include the Aboveground Storage Tank System (AT) and Adjacent Property (AP) as “Sources” for the SVOCs found on the site.

RESPONSE: Conceptual Site Model Worksheet Section 3 – Contaminant Source Characteristics has been revised as requested.

6. Section 5 – Exposure Media and Transport Pathways (pdf pg. 18 of 1273): Under the Receptors section, please include Commercial/Industrial under the Human Receptors section, and please include Terrestrial under the Ecological Receptors section. The reason for including Terrestrial receptors is due to the wooded parcels of the Carr China property as well as the potential for waterfowl usage of the property.

RESPONSE: Conceptual Site Model Worksheet Section 5 – Exposure Media and Transport Pathways has been revised as requested.

Mr. Curtis A. Phillips
CEC Project 194-569
Page 3
June 24, 2020

Please contact us at (724) 327-5200 if you have any questions.

Very truly yours,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

Elizabeth A. Stas, L.R.S. #296
Project Manager

David N. Olson, L.R.S. #49
Principal

EAS:DNO/jg
Enclosure

cc: WVDEP OER File – depoerfilecopy@wv.gov
Dr. Kelley Flaherty – STTWA (electronic copy only)

L-194569.Jun24/P