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## **9** FEDERAL MOGUL

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September 9, 2013

VIA FedEx Overnight

Montgomery County Health Department 210 South Pepper Street – Suite A Christiansburg, VA 24073

Re: Federal-Mogul Corporation Blacksburg, Virginia Facility Prohibition of Well Drilling

To Whom It May Concern:

Federal-Mogul Corporation, Inc. ("Federal-Mogul") is hereby providing the Montgomery County Health Department with written notification to prohibit well drilling under Virginia's Private Well Regulations, 12 VAC 5-630-380.A. The relevant Federal-Mogul property is located at 300 Industrial Park Road, SE; Blacksburg, VA 24060 ("the Property"). Federal-Mogul has agreed to provide this notification to the Montgomery County Health Department pursuant to a Statement of Basis issued pursuant to a Resource Conservation and Recovery Act ("RCRA") Corrective Action Program by the Virginia Department of Environmental Quality ("VDEQ") on July 9, 2012.

Historical operations at the Property have resulted in impacts to groundwater on and offsite from trichloroethylene ("TCE") and associated volatile organic compounds. The Property is currently subject to a RCRA Hazardous Waste Management Post-Closure Permit issued by VDEQ, EPA ID No. VAD054039961 ("RCRA Permit"), which requires Federal-Mogul to conduct certain soil and groundwater and remediation activities at the Property, including: continued operation of the existing onsite groundwater pump and treat system until groundwater remedial goals and cleanup targets are achieved; continued long-term performance monitoring of groundwater to verify the effectiveness and progress of the groundwater remedy in achieving remedial goals and clean up targets; continued operation of the soil vapor extraction system until soil remedial goals and cleanup targets are achieved for VOCs; and implementation and maintenance of institutional controls and engineering controls including property use restrictions for soil and groundwater until soil and groundwater remedial goals and cleanup targets are achieved.

Currently, the TCE groundwater plume extends from approximately the northern border of the Property southward to approximately Jennelle Road, a distance of approximately 3,400 feet (see Figure 1). The plume is widest at its southernmost point, where it extends approximately 2,200 feet in an east-west direction. The area of highest TCE groundwater concentration is a narrow elongated oval running from approximately the north-eastern quadrant of the Property southward to the south-central boundary of the Property. Onsite, the vertical extent of the plume extends to the base of the weathered zone and into unweathered bedrock, with the highest TCE concentration likely occurring at the base of the weathered zone. The vertical pinching outward of the plume is offsite at the base of the valley north of Jennelle Road.

Per the Statement of Basis mentioned above, an updated notice will be provided every three years to reflect the latest contaminated groundwater plume boundary.

Please feel free to contact me with any questions regarding this issue.

Very truly yours,

Mark T. Bauer

Director, Global EHS Powertrain

Attachment: Figure 1, Lateral Distribution of Trichloroethene in Groundwater

√cc:

Ms. Jutta Schneider, Groundwater/Corrective Action Program Manager, Office of Remediation

Programs, VDEQ

Director, Blue Ridge Regional Office, VDEQ

