

Georgia Department of Natural Resources

Environmental Protection Division

Martin Luther King Jr., Dr., Suite 1456, Atlanta, Georgia 30334

Richard E. Dunn, Director

(404) 656-4713

August 10, 2016

VIA E-MAIL AND REGULAR MAIL

AMC Whitfield Holdings, LLC
c/o Ms. Maria Callas
1141 Crest Valley Drive
Atlanta, GA 30327

Re: Fifth VRP Progress Report - March 3, 2016
AMC International Site, HSI No. 10405
310 Brookhollow Industrial Boulevard
Dalton, Whitfield County, Georgia

Dear Ms. Callas:

The Georgia Environmental Protection Division (EPD) has reviewed the Fifth VRP Progress Report dated March 3, 2016. EPD has noted the following concerns that should be addressed in accordance with the Voluntary Remediation Program Act (the Act) in subsequent reporting:

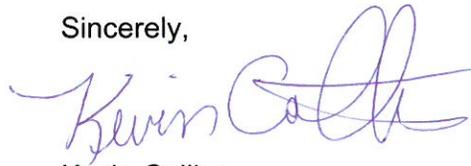
1. While EPD does not object to the shutdown of the GWRS at this time, please note that additional corrective action in the Dobbs Area plume may be required based on the results of the future sampling events that will be used to verify any rebound effects following the noted remedial action changes. Once a sufficient amount of rebound monitoring results are available, EPD concurs that the existing Ricker Method Plume Stability Analysis be updated, beginning from the time of system shutdown and including the new well (MW-24) and the abandonment of DMW-8/DRW-2, in order to assess the potential for plume expansion/increase and the potential need for further corrective action.
2. Additional information/data must be provided to support the technical impracticability arguments for groundwater delineation and to demonstrate that the site is in compliance with the delineation requirements and does not pose a danger to human health and the environment (Section 102-8-108(1) & (2)). The additional information should include, but not be limited to the following:
 - a. Further development of the conceptual site model by delineating the horizontal extent of groundwater impacts to below the established delineation criteria to the north of the site, as a result of the VOC exceedances at DMW-7/DR, MW-23, OBG-W5, DMW-5, and ARW-1.
 - b. According to available VRP file documents for the site, the groundwater to surface water exposure pathway is complete and the downgradient surface water has already been impacted above in-stream water quality standards (ISWQS). Please continue to gather additional data to determine the total potential for all impacts to migrate and discharge to the established point of exposure (POE), including determining the vertical gradients throughout the site, both in areas of high impacts and in close proximity to the POE, and completing the vertical delineation of groundwater impacts to the extent that is influential to the established remedial action objectives and establishing compliance with the Act.

3. EPD concurs with the wells proposed for evaluating the effectiveness of the MNA Pilot testing in the Dobbs Area.
4. In addition to the wells proposed to verify the effectiveness of the groundwater ISCO program, please add ARW-3, OBG-W5, and AMW-21 to the sampling program.
5. Please clarify the data that has been used to confirm that groundwater flow has re-equilibrated in the Fire Release Area.
6. When posting data in geologic cross sections as part of the conceptual site model, please post both soil and groundwater data by constituent and not Total CVOCs.

AMC must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards, and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by AMC. However, failure of EPD to respond to a submittal within any timeframe does not relieve AMC from complying with the provisions, purposes, standards, and policies of the Act.

EPD anticipates that the 6th VRP Progress Report no later than August 24, 2016. If you have any questions regarding this matter, please contact Robin Futch, PG of the Response and Remediation Program at 404-657-8686.

Sincerely,



Kevin Collins
Unit Coordinator
Response and Remediation Program

c: Kristen L. Ritter Rivera – EarthCon Consultants, Inc. (via e-mail).

File: HSI# 10405

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