

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

November 9, 2015

VIA E-MAIL AND REGULAR MAIL

Emory University
c/o Mr. Scott Thomaston, Associate Director
Environmental Health and Safety Office
1762 Clifton Road, Suite 1200
Atlanta, Georgia 30322

RE: VIRP Conceptual Site Model, Updated Groundwater Model, and Vapor Intrusion Evaluation
North Decatur Road/Burlington Road Site, HSI No. 10121
1784 North Decatur Road, Druid Hills, Dekalb County

Dear Mr. Thomaston:

The Georgia Environmental Protection Division (EPD) has reviewed the December 20, 2014 conceptual site model (CSM), updated groundwater model, and vapor intrusion evaluation for the North Decatur Road/Burlington Road site. Our comments are provided below:

Fate and Transport Model – EPD was able to replicate the BIOCHLOR plume centerline results presented in the revised model. EPD has noted that Emory cited a f_{oc} of 0.3% as a Georgia EPD default value in Appendix C. However, EPD does not have a compiled list of default values for this model. EPD concurs with Emory's conclusions and Emory can use the data from the next groundwater sampling analyses to further calibrate and validate the model to demonstrate the biotransformation of tetrachloroethylene (PCE).

Vapor Intrusion – EPD concurs that trichloroethylene (TCE) is not of concern, due to its maximum detected concentrations being less than the site specific screening levels for residential or commercial/industrial land use. Using the most recent PCE concentration of 550 ug/L in the *Vapor Intrusion Screening Level* (VISL) calculator, EPD also concurs that vapor intrusion from groundwater to indoor air is not of concern. EPD in its evaluation considered depth to groundwater (the most current is 37.6 feet) which over the last few years averaged greater than 40 feet; groundwater flow pathway, and the location of RW-2 (historically has shown the highest PCE concentration) which is not upgradient of the Mathematics building. For information purposes, Emory should also note that a lower attenuation factor could have been used, if justified, in calculating vapor intrusion potential into the mathematics building.

EPD concurs with the Draft of Emory's Uniform Environment Covenant (UEC) with minor changes which have been sent electronically. If Emory has no comments to the changes then Emory should execute the UEC and submit to EPD and the required entities. By February 29, 2016, please submit a compliance status report (CSR) in accordance with Section 12-8-107(e) with the Voluntary Remediation Program Act. If you have any questions, please contact Montague McPherson at (404) 657-0483.

Sincerely,



Jason Metzger
Acting Program Manager
Response and Remediation Program

c: Dale P. Voykin - URS Corporation

File: HSI No. 10121

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