

Georgia Department of Natural Resources

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Environmental Protection Division

Judson H. Turner, Director

Land Protection Branch

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Reply To:

Response and Remediation Program
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October 7, 2014

BFEL Indemnitor, Inc.
Attn: Ken Anderson
P.O. Box 3010
St. Charles, IL 60174

VIA EMAIL and REGULAR MAIL

Re: VRP Status Reports No. 4 and No. 5
Estech General Chemicals Site, HSI Site No. 10196
Atlanta, Fulton County, Georgia
Tax Parcels 17-0191-LL0244 and 17-0191-LL0400

Dear Mr. Anderson:

The Georgia Environmental Protection Division (EPD) has received and reviewed the VRP Status Report No. 2 dated February 7, 2014 and VRP Status Report No. 5 dated August 8, 2014 that have been submitted by AMEC on behalf of BFEL Indemnitor, Inc. (BFEL) in for the Estech General Chemicals Site. In addition, EPD met with representatives of BFEL on September 18, 2014 to discuss the current status and future path forward for the site. EPD provides the following comments:

1. During the September 18, 2014 meeting, BFEL proposed an interim Type 5 risk reduction standard (RRS) for soil consisting of fencing and signage for an indeterminate amount of time until an end use could be determined for the property. EPD cannot concur with the proposed interim Type 5 RRS for soil. BFEL should propose a permanent Type 5 RRS or other applicable RRS approach that will result in a permanent remedy for site soils achievable within the approved VRP application timeframe.
2. EPD concurred with the February 2014 Progress Report delineation proposal for the presence of pesticides in groundwater west-northwest of TW-1; however, no additional delineation information was included in the VRP Status Report #5 dated August 8, 2014. Please provide documentation of the horizontal delineation at this location in future reports.
3. According to the VRP Progress Reports, "deeper investigation of site constituents in groundwater at the well MW-106D location is not warranted because there is no exposure pathway to the groundwater in the deeper fractures." Section 12-8-108(1) of the Act states that evidence of horizontal and vertical delineation must be addressed as part of the VRP investigation. Therefore, in order to complete the conceptual site model for the site and meet the above referenced VRP delineation requirements, please ensure that when the final VRP CSR is submitted that a sufficient amount of data is presented to demonstrate the vertical extent of the groundwater impacts at the site.

In addition, please note the VRP Progress Reports for the site continue to indicate that monitoring well location MW-106D is a "point of demonstration (POD)" monitoring location to evaluate whether groundwater concentrations are protective of the "point of exposure (POE)," in this case the stream. According to the previous Progress Reports, the groundwater in the bedrock fractures screened by MW-106D is not surfacing in the stream and is therefore not a complete exposure pathway. Based on this conclusion, monitoring well MW-106D cannot be used in the future as a POD location, and in light of the newly proposed corrective actions for both soil and groundwater EPD recommends that the new POD monitoring locations for the stream should take into account the revisions to onsite and offsite corrective measures.

4. Based on the information provided in the VRP Status Reports and the discussions held during a September 18, 2014, meeting between EPD and site representatives, Type 5 RRS corrective action was proposed that incorporated the use of an area average approach to soil cleanup at the site property. In the event that the site wishes to continue to pursue an area averaging approach to soil remediation, please ensure that the following comments are addressed:
 - a. According to the VRP Progress Reports, the entire site was proposed as one exposure area and the entire off-site area accessible to the Tilford Yard railyard workers was proposed as another exposure area. A figure must be provided to illustrate the extent of the offsite exposure area(s), including the soil sample locations from each of these areas that will be used to develop the exposure domain UCL-based exposure point concentration (EPC). Regarding the established onsite exposure domain, EPD continues to require that the area averaging not apply to designated "hot spots" and/or materials defined as "source material" in accordance with Section 102-8-108(1) of the Act. Therefore, based on the data provided, at a minimum the former cooling pond(s) must be treated as a separate release area as the contamination in this area does not meet the random contaminant distribution scenario that would be applied to an area averaging exposure domain scenario.
 - b. According to the VRP Status Report #5 dated August 8, 2014, area averaging is being used to demonstrate compliance for subsurface soil as well as surface soils (<2-feet). Please note that area averaging should not be applied to subsurface soils as the exposure scenarios to subsurface soils, and resulting cleanup criteria, are not based on random exposure to these soils over the entire ED but rather specific exposure scenarios such as construction/utility worker and leaching based determinations. Therefore, please ensure that the subsurface data set is removed from the area averaging calculations, and that a not-to-exceed value is utilized for these subsurface soils.
 - c. Because soils with contaminant concentrations exceeding the cleanup level will be left onsite, it is important to ensure that those concentrations are not so high that they pose acute or subchronic health risks according to USEPA Guidance on Surface Soil Cleanup at Hazardous Waste Sites dated May 2004 (EPA 93555.0-91). Calculations for the acute and subchronic exposure concentrations for each of the contaminants of concern must be provided along with a table illustrating the comparison of the onsite contaminant concentration levels to these established acute exposure levels.
 - d. Please provide EPD with an Excel spreadsheet of all sample location data that were used to calculate the area average EPCs for the site.
5. According to the August 2014 Report, a pump and treat hydraulic containment/infiltration gallery corrective action has been proposed to address impacts within the groundwater. Based on existing site data, and data available for the upgradient M&J Solvent site (HSI Site No. 10096), a dissolved phase groundwater plume consisting of multiple organic compounds exists onsite and upgradient of the Estech Site. Due to the potential influence of this proposed groundwater corrective action on this dissolved phase organic compound plume, additional site characterization data will be required prior to EPD concurring with the proposed groundwater corrective action. This information should include the following:
 - a. Complete delineation and characterization of the dissolved phase plume, vertically and horizontally, within the confines of the Estech property, especially in the areas directly upgradient of the extraction wells.

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- b. While characterization and delineation activities are ongoing on the upgradient property, in particular on the Whitaker property, complete characterization of the impacts to groundwater has not yet been completed. These investigations on the Whitaker property will need to be completed in order to accurately determine the influence of the proposed groundwater corrective action on the upgradient groundwater plume migration.
- c. According to the August 2014 Progress Report, the groundwater recovery wells will be installed approximately 25-feet into bedrock, or deeper, and will be screened from the water table to the total depth of the well. Based on the above noted groundwater impacts originating from the upgradient property, EPD recommends that additional characterization of the groundwater impacts in the area of the recovery wells be determined prior to the utilization of such a large screened interval so as to avoid further mobilization, either horizontal or vertical, of groundwater impacts that may currently be isolated to specific depth intervals within the subsurface.
- d. If access is not restricted, the recovery wells should be installed as close as possible to the hot spots to effectively remediate groundwater contamination.
6. Pesticides have been detected in sediment samples previously collected from the unnamed stream. It is unclear how the currently proposed remedial approach will address these contaminated sediments that have occurred either through depositional migration or groundwater discharging upwards into the sediment streambed. Please clarify how the contaminated sediments will be addressed.
7. EPD's Risk Assessment staff is currently reviewing your Updated EPC and Risk Reduction Standards Calculations in Appendix C of the VRP Report #5. EPD will comment on it in a separate letter once the review is completed.
8. Please provide an updated schedule for implementation of corrective action at the site.

If you have any questions regarding this matter, please contact Mr. Yue Han at 404-657-8678.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Gregory Wrenn, AMEC

File: HSI 10196