Georgia Department of Natural Resources
Environmental Protection Division – Land Protection Branch
2 Martin Luther King, Jr. Dr. S.E., Suite 1054 East, Atlanta, Georgia 30334
Office 404-657-8600/Fax 404-657-0807
Judson H. Turner, Director

June 13, 2014

COPY

VIA E-MAIL AND REGULAR MAIL

Michael Brom, Director Environment
PCS Joint Venture, Ltd.
1101 Skokie Blvd, Suite 400
Northbrook, IL 60062

Subject: Voluntary Remediation Program
Semi-Annual Progress Reports September 9, 2012, March 9, 2013, September 9, 2013, and March 9, 2014; and
Fifth Semi-Annual Groundwater Monitoring Report, November 2011
Farmer's Favorite Fertilizer, HSI Site No. 10259
315 4th Avenue
Moultrie, Colquitt County, Georgia

Dear Mr. Brom:

The Georgia Environmental Protection Division (EPD) has reviewed the subject Semi-Annual Progress Reports that have been submitted pursuant to the Georgia Voluntary Remediation Program Act (Act) O.C.G.A. §12-8-100 et seq. EPD has the following comments:

1. Please note that the groundwater sampling procedures of Region 4 EPA SESDPROC-R2 effective October 28, 2011, have been replaced by SESDPROC-R3 effective March 6, 2013.

2. In many cases groundwater samples were collected with final turbidity readings above 10 NTUs and without removing three to five well volumes. Purging of wells should continue until turbidity readings are below 10 NTUs, especially when less than three to five well volumes are removed during purging. EPD recommends using the multiple purge volume method for shallow wells rather than the low flow/low volume method when turbidity of samples is an issue. Purging should continue until the turbidity is 10 NTUs or less or until at least 5 well volumes have been removed from the well before taking the sample, as outlined in EPA Region 4's Science and Ecosystem Support Division Operating Procedures, SESDPROC-301-R3, March 6, 2013. In addition, the field filtering of samples should be done as a last resort provided purging of the wells has continued for three to five well volumes.

3. Groundwater contamination has not been delineated to the approved delineation standards up gradient of monitoring wells MW-29S and MW-48S, or down gradient of MW-41S.

4. EPD agrees with the proposed limited soil assessment to verify soil conditions in the area of the former waste water pond in the south-central area of the Site.

5. Monitoring wells installed in August 2011 were not installed in accordance with the procedures outlined in the Region 4 EPA Science and Ecosystem Support Division Operating Procedures, SESDGUID-101-R0, February 2008. None of these wells includes a bentonite well seal. Use the well construction parameters presented in SESDGUID-101-R0 for future well installations. This installation guidance indicates that

a well seal 2 feet thick consisting of bentonite pellets should be placed between the filter pack and the grout. Fine sand is not considered a suitable material for the seal.

6. Some wells have been purged dry. When a well is purged dry, it is not necessary to purge it further. The sample can be taken as soon as the well has recovered sufficient volume to do so (see SESDPROC-301-R2).

7. Table 1 of the November 11, Fifth Semi-Annual Ground Water Monitoring Report indicates that MW-30S and MW-31S are screened in the intermediate aquifer. These appear to be the only wells with the "S" designation that are screened in that zone. EPD recommends using the same purging technique for these two wells as is used for other wells screened in the intermediate aquifer.

Should you have any question or concerns regarding this matter, please contact Mr. Bill Williams of the Response and Remediation Program at (404) 657-8664.

Sincerely,

David Reuland
Unit Coordinator
Response and Remediation Program

c: Jeffry R. Wagner, URS

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