

Georgia Department of Natural Resources

Land Protection Branch-Environmental Protection Division

2 Martin Luther King, Jr. Dr., S.E., Suite 1456 East, Atlanta, Georgia 30334

Judson H. Turner, Director

Reply To:

Response and Remediation Program
2 Martin Luther King, Jr. Drive, S.E.
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Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

April 4, 2014

VIA E-MAIL AND REGULAR MAIL

Hull Real Estate, LLC
c/o John P. Martiniere, Jr., P.E.
Peachtree Environmental, Inc.
3000 Northwoods Parkway, Suite 105
Norcross, Georgia 30071

Re: Response to EPD's May 3, 2012 Comment Letter, October 30, 2012
1st VRP Semiannual Progress Report, October 2012
2nd VRP Semiannual Progress Report, April 2013
The Loef Company Property, HSI Site No. 10376
590 Old Hull Road, Athens, Clark County, Georgia
Tax Parcels 221 00C, 221 001, and 162 037

Dear Mr. Martiniere:

The Georgia Environmental Protection Division (EPD) has completed its review of the Response to EPD's May 3, 2012 Comment Letter dated October 30, 2012, and the 1st and 2nd VRP Progress Reports (Reports) dated October 2012 and April 2013, respectively. EPD was advised in a letter dated January 6, 2014 (Sanchez to Beavers) that Hull Real Estate, LLC (Hull) has ceased corrective action at the qualifying properties pending the resolution of a contractual dispute with current property owner, Omnisource Athens Division, LLC. Please note that if corrective actions at the qualifying properties are not resumed by August 1, 2014, I may recommend termination of the enrollment of the property from the Voluntary Remediation Program (VRP) to the Director pursuant to §12-8-107(d)(1) of the VRP Act. EPD offers the following comments:

Response to EPD's May 3, 2012 Comment Letter

1. Hull's response to Comment #4 of the May 3, 2012 letter states that the overall extent of UECs will be evaluated if future assessments and modeling indicate that the contaminant plume has moved off-property. Based on Hull's proposed use of point of demonstration monitoring in groundwater to certify compliance with applicable risk reduction standards (RRS), EPD would like to reiterate that a uniform environmental covenant will be required for the qualifying source properties and any other impacted properties that will rely upon controls for the purpose of certifying compliance with RRS.
2. Based on the concentrations of benzene and TCE and its breakdown products at newly installed monitoring well MW-11, and given the inherent potential for hotspot contamination at a scrap metal operation and that historical potentiometric data indicates groundwater flow is primarily to the southeast, it is possible that contamination may have migrated to MW-4A from a source located to the northwest. Therefore, if future contaminant concentrations rebound at MW-4A, EPD may require the installation of a horizontal delineation well to the southeast. This well was requested in Comment #6 of the May 2012 letter, and although excluded from Figure 11 of the October 2012 Report, this well location, designated as P-3, was agreed upon in the September 10, 2012 meeting with Hull.

3. The slug tests requested in Comment #8 were not completed and the Biochlor model was not included in the April 2013 Report as indicated in Hull's response to Comment #15 of EPD's May 3, 2012 letter. Please ensure that the information is provided in the next semiannual report.
4. Comment #9 of EPD's May 3, 2012 letter addresses Hull's development of a hydraulic gradient of 0.0145 ft./ft for the subject properties. Horizontal gradient should be determined using three wells that form a triangle in the area of interest (by solving a three-point problem). This method yields both magnitude and direction in the area of the three wells. It is also acceptable to determine gradient using the potentiometric surface map by making measurements in the area of interest (for example, from a source area to a point of demonstration). The University of Kansas spreadsheet method may well give an adequate result also, provided that it allows the gradient to be determined for the specific area of interest.
5. While depth to submersible pump information was added to the field water quality sampling forms for the February and September 2012 sampling events, it was not included on the forms for the March 2013 event. Please ensure that pump depth information is added to all future purging and sampling information sheets as requested in Comment #13 of EPD's May 3, 2012 letter.

Investigation and Remediation Plan

6. Section 4.0 of the April 2013 Report proposes MW-10 as a point of demonstration (POD) well for the VOC plume. A decision as to the optimal location of points of exposure (POE) and associated POD locations should be determined after the newly installed wells are surveyed, the ponding issue has been addressed, and the potentiometric maps have been updated (see Comment #7 below).
7. Section 4.1 of the April 2013 Report discusses groundwater elevations at the site. All newly installed wells need to be surveyed with the top of casing elevations recorded, and more data should be collected to properly define the potentiometric surface at the qualifying properties. Additionally, the obstruction of storm water runoff apparently caused by the placement of soil piles and the resulting infiltration of impounded water in the vicinity of MW-7A, 8A, and 9A should be addressed as soon as possible.
8. Section 4.6 of the April 2013 Report proposes the installation of seven (7) additional on-property monitoring wells to complete horizontal delineation of the groundwater plume in the locations depicted on Figure 12. EPD has determined that Hull could likely install fewer than 7 monitoring wells to attempt to achieve horizontal delineation of the plume and recommends the installation of wells in the following locations: west of MW-12 (off-property), and north of MW-11 (near the former location of MW-1, which has been destroyed). Please note that more wells might be required based on future sample results.

General

9. During recent sampling events, the groundwater sample was sometimes collected before the well was geochemically stable. In SESDPROC-301-R3, stability is indicated by three consecutive measurements in which the pH remains constant within +/- 0.1 standard units, the specific conductance varies no more than approximately 5%, and the turbidity has either stabilized or is below 10 NTUs. If stability is not reached after three well volumes have been removed from the well, SESDPROC-301-R3 calls for purging to continue until stability is

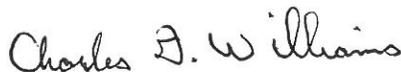
reached or until at least five well volumes have been purged. The following wells had not reached stability when the sample was collected: February 2012 sampling event (MW-2A); September 2012 sampling event (MW-8A and MW-9A); and March 2013 sampling event (MW-3A, MW-7A, MW-8A, MW-9A, MW-12, and MW-13). Continue purging until stability is reached before collecting the sample or until at least five well volumes have been removed from the well during future sampling events.

10. No information is given on the well sampling log about pumping rate. It was noted that five of seven wells were pumped dry during the February 2012 sampling event, and three of seven wells were pumped dry during the September 2012 sampling event. The space on the form for indicating whether the well was pumped dry was not filled in for the March 2013 sampling event. As noted in SESDPROC-301-R3, pumping to dryness should be avoided if possible. Consider using a lower pumping rate. Also, always note on the logging form if the well was pumped dry, and add the sample collection time to the logging form.
11. EPD noted that trip blanks, equipment blanks, and duplicate samples were not consistently collected and/ or properly documented in accordance with Region 4 SESD Operating Procedure SESDPROC-011-R4. For example, it appears that a trip blank was not analyzed for the February 2012 sampling event, and a collection time was not recorded for the duplicate sample that was collected on September 26, 2012. Please ensure that quality control samples are collected and recorded in accordance with SESDPROC-011-R4 during future sampling events.

Hull Real Estate, LLC 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 Hull Real Estate, LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve Hull Real Estate, LLC from complying with the provisions, purposes, standards and policies of the Act.

EPD anticipates receipt of confirmation that VRP activities are continuing by no later than August 1, 2014. The next VRP progress report, which should finalize horizontal and vertical delineation on all impacted properties, finalize the conceptual site model (CSM) and the remedial plan, and address the comments listed above, must be submitted by October 30, 2014. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at (404) 657-0487.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Omnisource Athens Division, LLC, David Campbell
Arnall Golden Gregory, LLP, John Spinrad
Albert A. Sanchez, Jr., P.A.

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