

Georgia Department of Natural Resources

Land Protection Branch-Environmental Protection Division

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Judson H. Turner, Director

March 9, 2016

VIA E-MAIL AND REGULAR MAIL

OmniSource Athens Division, LLC
c/o Brian Winters, Corporate Environmental Manager
7575 West Jefferson Boulevard
Fort Wayne, Indiana 46806

Re: 3rd Semiannual Progress Report, July 30, 2015
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, VRP #802705980

Dear Mr. Winters:

The Georgia Environmental Protection Division (EPD) has reviewed the 3rd Semiannual Progress Report dated July 30, 2015 (Report), which was submitted for the subject tax parcels (the "Property") pursuant to the Georgia Voluntary Remediation Program Act (the Act). The Report was submitted by APEX Companies, LLC (APEX) on behalf of OmniSource Athens Division, LLC (OmniSource) and details the activities conducted by OmniSource since the submittal of its application into the VRP on March 12, 2015. Completed activities include the installation and sampling of one deep monitoring well (MW-1D), repair and sampling of existing shallow monitoring well (MW-1), sampling and abandonment of source area well MW-2A, aquifer testing, and fate and transport modeling of the contaminant plume. EPD offers the following comments:

1. EPD agrees with the proposal for two additional semiannual groundwater sampling events in Section 6.0 of the Report to confirm plume stability prior site closure through the use of a uniform environmental covenant (UEC). OmniSource may sample all existing monitoring wells as proposed, or you may suggest a subset of wells for EPD's approval prior to conducting the next sampling event. Since this sampling frequency differs from the approved plan, please provide a revised VIRP schedule in the next progress report. Additionally, to avoid a delay in property closeout, please submit a draft UEC for EPD's review with the next semiannual progress report.
2. EPD agrees that lead concentrations in groundwater meet the Type 1 risk reduction standard (RRS) of 0.015 mg/L, but cannot agree that it is not considered a chemical of concern at the Property as stated in Section 2.4 of the Report, since it was detected in on-property soil.
3. The conceptual site model (CSM) is provided in Section 4.0 of the Report. It appears that OmniSource did not clearly indicate the status of each exposure pathway as needed to comply with the Act. In future reports, please provide an evaluation of the status of each exposure pathway (i.e. for the Groundwater Pathway: The horizontal delineation of the plume is complete based on information provided in the March 12, 2015 Voluntary

Remediation Progress Report and Application, but the vertical extent of contamination is not defined pending a survey of monitoring well MW-1D).

4. Section 4.2.3 of Hull's 2011 VIRP established point of demonstration monitoring for groundwater at the Property with the point of demonstration (POD) well identified as MW-9A. OmniSource established MW-4A as a POD well in the subject Report. Please note that the POD well should have an associated downgradient point of exposure (POE) established with it in accordance with Section 12-8-108(4) of the Act. OmniSource needs to establish a POE in the next progress report. Please note that Section 12-8-102(11) of the Act defines point of exposure as the nearest of:
 - The closest existing downgradient supply well,
 - The likely nearest future location of a downgradient supply well where one is not currently available nor will likely be made available any time soon, or
 - A hypothetical point of drinking water exposure located 1,000-feet downgradient of the delineated contaminant plume.
5. Section 5.0 of the Report discusses contaminant transport evaluation. Please note the following comments with respect to the BIOCHLOR model that is provided in Appendix F:
 - A. Fate and transport models are very sensitive to input values of fraction organic carbon (foc) used to calculate retardation factors for organic contaminants. The value used for foc was 2.0E-3. Further justification for the use of this value should be provided. It is acceptable if this is based on actual data; otherwise the default value is 1.0E-3.
 - B. The same concentration values were used for the source and the location 70-feet downgradient of the source, which is not acceptable. If OmniSource believes the source is 70-feet upgradient of MW-11, you should plug in the highest maximum detection of TCE on-property or a reasonable value (DNAPL – 1800 to 2000 ug/L) in the source part of the model and use MW-11 and MW-4A as the other data points for the model.
 - C. With respect to the output sheets, the calibration runs need to be identified on the appropriate print out sheets.
 - D. Further detail on the F&T model inputs and assumptions should be provided. EPD requires the following items, which are required for all modeling reports at a minimum: a general description of the model, demonstration that the model is appropriate, description of the scope of the model, description of the site environmental history, description of current groundwater conditions, list/table of ALL model input values and their source/justification (if a literature value, then we need a bibliographic reference so that we can look it up), any input values that are neither site-specific values *nor* reference values must be proven to be conservative, description of model calibration procedures, description and results of a sensitivity analysis, and a discussion of model results including, but not limited to:
 - A discussion on how the plume will change through time and what to expect.
 - Output data should be presented in both tabular form and a printout of the output pages should be provided. Supporting maps showing site details and output may provide a means of confirming the stated model objectives have been met, such as:
 - Isopleth map showing anticipated maximum extent of contaminant plume.
 - Isopleth maps indicating predicted incremental changes in plume configuration through time. Time increments should be based on the modeling objectives and correspond with proposed performance monitoring requirements. Isopleth maps based on field

data should be provided for those monitoring events used to calibrate and/or validate modeled results for comparison.

- Conclusions and recommendations for confirming the adequacy of the modeling effort or the need for revisions to the model in the future.
6. Figure 4 of the Report illustrates the concentrations of TCE detected in groundwater in January 2015. However, the June 3, 2015 sampling results for MW-1 and MW-1D were not posted to any figures. Please post the most recent data collected from each well in at least one figure in future reports.
 7. As the Report presents interpretations and conclusions concerning geologic conditions at the site, the following statement is required as a signature page, to be signed and sealed by the preparer of the report:

"I certify that I am a qualified ground-water scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training and experience in groundwater hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport. I further certify that this report was prepared by myself or by a subordinate working under my direction."

Please address the subject comments in the next Semiannual Progress Report, which is due by July 31, 2016. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at (404) 657-0487.

Sincerely,



Robin S. Futch, P.G.
Acting Unit Coordinator
Response and Remediation Program

- c: Apex Companies, LLC, Kathleen Roush, PG (Via email)
Arnall Golden Gregory, LLP, John Spinrad (Via email)

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