

# Georgia Department of Natural Resources

## Environmental Protection Division

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Judson H. Turner, Director

Land Protection Branch

Phone: 404/657-8600 FAX: 404/657-0807

January 25, 2016

ConAgra Foods, Inc.  
c/o Mr. Chris Aupperle  
1 ConAgra Drive  
Omaha, Nebraska 68102

**VIA FIRST-CLASS MAIL AND EMAIL**

Re: EPD Review of Response to EPD Comments  
Swift Meat Processing Plant, HSI Site Number 10509  
Moultrie, Georgia; Colquitt County

Dear Mr. Aupperle:

The Georgia Environmental Protection Division (EPD) is in receipt of your consultant's letter, dated August 31, 2015, responding to our comment letter, dated June 4, 2015, on the Voluntary Remediation Program (VRP) application for the former Swift Meat Processing Plant. The VRP application was submitted to EPD pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100. Our comments are provided below.

- 1) Based upon historical potentiometric data, the direction of groundwater flow off site is unclear. The topographically downgradient directions on site are to the north and east, and impact to groundwater has historically been detected to both the north and east of the source areas. Accordingly, EPD has determined that both the north and east should be considered hydraulically downgradient directions:
  - Potentiometric maps constructed from current groundwater-elevation data should still be included in each semiannual report.
  - A groundwater fate-and-transport model will have to be run in each direction to determine that each point-of demonstration (POD) is protective of its respective point-of exposure (POE).
- 2) Section 12-8-102(b)(11)(C) of the Act defines a point of exposure as "The hypothetical point of drinking water exposure located at a distance of 1,000 feet downgradient from the delineated site contamination under this part," if no existing potable wells or likely future locations of potable wells are closer. Groundwater contamination has not yet been delineated to the east, so no POE can be established in that direction.
- 3) At least two delineation wells will be required east of MW-9 and MW-15. Accordingly:
  - A delineation well is needed at or east of the former location of MW-28 (east of MW-9). EPD will not accept data from the 2004 and 2007 sampling events as proof of delineation. Recent groundwater data will be required.
  - If owners of properties immediately east of the site deny access, locations should be sought farther to the east. Property owners who deny access may be required to submit a

Compliance Status Report, or to otherwise enter into an environmental covenant restricting groundwater use on their properties.

- 4) EPD questions the choice of MW-9 as a point-of-demonstration (POD) well, given that the lead concentration in MW-9 has historically been above the Type 1 RRS for that substance. The purpose of a POD well is to demonstrate that groundwater concentrations are protective of the downgradient POE. One of the required delineation wells east of MW-9 and MW-15 could possibly serve as a POD well, if delineation is achieved.
- 5) Pursuant to Comment 1 above, please specify a POE in the northern downgradient direction. A POD well will also be required in the northern downgradient direction. Existing unimpacted wells on the northern portion of the site may be evaluated for selection of a possible POD. If no existing well is deemed suitable for a POD to the north, installation of one or more additional wells will be required.
- 6) On the Monitoring Well Location Map provided with the response letter, the northern boundary of the 2.52-acre Tumlin property is cut off. In future submittals, please expand the depicted area on the ground to include the entirety of the City of Moultrie and Tumlin parcels (those two parcels comprise the portion of the site currently listed on the State of Georgia Hazardous Site Inventory).

In the future, EPD would prefer the Response to Comments be included with the next scheduled semiannual report. If an issue needs to be resolved sooner than that, please contact EPD via email or telephone.

ConAgra Foods, Inc. 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 ConAgra Foods, Inc. However, failure of EPD to respond to a submittal within any timeframe does not relieve ConAgra Foods, Inc., from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-3935.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: David Smoak and John Quinn, AMEC/Foster Wheeler (via email)

File: HSI #10509