

Reply To:
Response and Remediation Program
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Suite 1054, East Tower
Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

November 4, 2013

VIA EMAIL and REGULAR MAIL

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

Re: VRP Status Report No. 1 dated August 8, 2012
VRP Status Report No. 2 dated February 8, 2013
VRP Status Report No. 3 dated August 8, 2013
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. 1 dated August 8, 2012, VRP Status Report No. 2 dated February 8, 2013, and VRP Status Report No. 3 dated August 8, 2013 that have been submitted by AMEC on behalf of BFEL Indemnitor, Inc. in for the Estech General Chemicals Site. EPD provides the following comments:

1. Copper and zinc are not fully delineated in soil at the site. More specifically, copper and zinc are not horizontally delineated at locations of TW-1-0-2, TW-1-0-2, SS-24, SB-B-0-2, SS-08, SO-C1-0-2, SS-06, and SO-SB156-0-2. Zinc is not horizontally delineated at two additional locations: SS-01 and TW-10-0-2. Both copper and zinc are not vertically delineated at locations of TW-6-18-20, TW-10-14-16, and SB-B-10-12. Copper is not vertically delineated at SO-D1-18-20.
2. Pesticides are not delineated in groundwater at TW-1 and MW-106D.
3. According to the August 2012 Progress Report, an area averaging approach was used to demonstrate compliance with the Type 4 risk reduction standards (RRS) in the soils onsite. While area averaging is a viable approach for soil cleanup at VRP sites, please note that the February 2013 Report does not include a sufficient amount of data necessary to demonstrate compliance with compliance with Type 4 RRS at this time. EPD requests that the following comments be addressed when implementing an area averaging approach at the site:
 - a. Clear definition of the "exposure domain(s)" and adequate justification of random exposure throughout the established exposure domain(s) should be provided. Please ensure that pre- and post-remediation land use, and the location of source areas and/or hot spots, is taken into account when establishing the exposure domains.

- b. Please note that area averaging should not apply to materials defined as “source material,” as Section 102-8-108(8) stipulates that, “compliance with site-specific cleanup standards that require that source material be removed may be satisfied when such material is removed, decontaminated, or otherwise immobilized in the subsurface, to the extent practicable.” Therefore, please ensure the exposure domain(s) do not incorporate the data from any presumed source areas at the site, (i.e. the former cooling pond(s) and acid chambers areas).
 - c. According to the Report, composite soil samples were collected as part of the additional soil investigations. Please note that composite samples cannot be used for the area averaging methods because they do not represent contaminant concentrations at specific locations. Data from the composite samples should be removed from any area averaging data sets, and the compliance determinations (UCLs and EPCs) for soil should be determined based on revised area averaging calculations. All remedial designs such as soil excavation should be revised accordingly.
4. According to the February 2013 Report and the August 8, 2013 Report, an updated fate and transport model for metals and pesticides in groundwater was proposed as part of the “Work to be Performed” at the site. Please ensure that this modeling update is provided in the next Progress Report, as this model was to be provided to address EPD’s February 8, 2012 VRP Application Comments Letter.
5. A Permeable Reactive Barring (PRB) Pilot Test was conducted and the first round of post-injection quarterly monitoring has been completed. While the results from the pilot test do not show any significant positive impact on groundwater concentrations, EPD does not comment on its effectiveness until more data are collected. Please provide an updated cross section to illustrate the vertical design component/details of the PRB pilot test in the next report.

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: Rhonda N. Quinn, AMEC

File: HSI 10196