

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

November 18, 2015

VIA E-MAIL AND REGULAR MAIL

AMC International, Inc.
c/o Ms. Maria Callas
1850 South Cobb Industrial Boulevard
Smyrna, Georgia 30082

Re: Authorization to Shut Down Dobbs Area Groundwater
Remediation System – October 12, 2015
Fourth VRP Progress Report – August 31, 2015
AMC International Site, HSI No. 10405
310 Brookhollow Industrial Boulevard
Dalton, Whitfield County, Georgia

Dear Ms. Callas:

The Georgia Environmental Protection Division (EPD) has reviewed the Fourth VRP Progress Report, dated August 31, 2015 and correspondence dated October 12, 2015 regarding the request to shut down the Dobbs Area Groundwater Remediation System. Subsequent to that review and the October 13, 2015 meeting and presentation on the plume analytics evaluation, EPD offers the following comments which should be addressed pursuant to the Voluntary Remediation Program (VRP) Act.

1. In reviewing the recent groundwater data for monitoring wells in the vicinity of the Dobbs System and submittals in EPD's release notification and Brownfield Program files, EPD has determined that the discontinuation of the operation of the Dobbs groundwater treatment system will be acceptable based on the following conditions:
 - Abandonment of DMW-2/RW-8 and installation of MW-24 prior to turning off the Dobbs system;
 - Documentation of the completed well receptor survey;
 - Prior to turning off the Dobbs system, AMC should provide further substantive details on what the contingency plan will entail should an upward trend in contaminant concentrations be detected in any of the downgradient monitoring wells;
 - Quarterly sampling of the monitoring wells for volatile organic compounds (VOCs) and Monitored Natural Attenuation (MNA) analyses as proposed in Section 5.2 for the MNA pilot test, and;
 - One surface water sample should be collected in the same location (DSW-1) previously sampled by O'Brien & Gere in 2013 and 2014. This sample should be collected during the quarterly groundwater sampling events and analyzed for a full VOC scan.
2. EPD does not concur that further delineation in the vicinity of the Dobbs Area does not appear to be warranted. At this point delineation has not been completed and based on the concentrations that have been detected in the vicinity of the Dobbs System and the

fact that the site was listed for the groundwater pathway, the Act requires delineation to Type 1 risk reduction standards. MW-03 on the Cargill property appears to be a potential downgradient well that could complete the delineation requirement if the screened interval is appropriate. EPD suggests that AMC verify the well construction details as well as secure access for the collection of a groundwater sample from this well. Should this well not fulfill the needed delineation requirement, an additional well may be warranted downgradient of the Dobbs plume in the future.

3. For all subsequent sampling of MW-23, the well should be redeveloped, as required, and sampled using low flow/low volume techniques not passive diffusion bags to get a representative sample for delineation purposes.
4. Following the ISCO injection program in the Fire Release Area, analysis for RCRA metals should be added to the semi-annual groundwater monitoring program, starting with the June 2016 sampling event.
5. A variety of items were noted in the field sampling logs which are not compliant with the EPA Region 4 Field Branches Quality System and Technical Procedures, Science and Ecosystem Support Division (SESD OPs), "Procedure SESDPROC-301-R3, Groundwater Sampling," effective date March 6, 2013 including the following: 1.) the incorrect location (too high or too low) of the pumps relative to the screened interval during purging; 2.) recorded water levels during purging in several wells exceeded drawdowns greater than 0.33 feet; and 3.) elevated turbidity readings. In addition, some sampling logs (OBG-W2) were not included in Appendix B. Please correct these deficiencies in subsequent groundwater sampling.

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

EPD anticipates that the implementation of the ISCO corrective action plan will get underway in January 2016 and that the 5th VRP Progress Report will be submitted no later than February 29, 2016. If you have any questions regarding this matter, please contact Robin Futch, PG of the Response and Remediation Program at 404-657-8686.

Sincerely,



Jason Metzger

Unit Coordinator

Response and Remediation Program

c: Justin Baskin – Apollo Technologies (via e-mail)
Kristen L. Ritter Rivera – EarthCon Consultants, Inc. (via e-mail).

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