



ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

**Land Protection Branch**  
2 Martin Luther King, Jr. Drive  
Suite 1054, East Tower  
Atlanta, Georgia 30334  
404-657-8600

June 16, 2017

Robert Lewis  
Genuine Parts Company  
2999 Circle 75 Parkway  
Atlanta, Georgia 30339

**VIA FIRST-CLASS MAIL**

Re: Conditional Approval of Voluntary Investigation and Remediation Plan, Amendment 1  
Rayloc Facility, HSI Site Number 10547  
Atlanta, Georgia; Fulton County

Dear Mr. Lewis:

The Georgia Environmental Protection Division (EPD) is in receipt of the Voluntary Investigation and Remediation Plan (VIRP), Amendment 1, for the former Rayloc Facility. The VIRP, Amendment 1, 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. EPD is conditionally approving the VIRP, Amendment 1, which specifies corrective action consisting of the following:

Soil blending within the source area where a waste pit was formerly located.

2. EPD's conditional approval of the VIRP, Amendment 1, is contingent upon the following:

Confirmation soil sampling will be conducted via DPT or split-spoon subsequent to backfilling the excavation, and prior to certifying soil to applicable risk reduction standards (RRSs). EPD does not believe that one soil sample obtained from each 10-foot-lift cell during backfilling is sufficient to show that the source area is in compliance with RRSs. Based upon the proposed dimensions of the treatment zone, each 10-foot-lift cell encompasses an area of 4,900 ft<sup>2</sup> and a volume of 49,000 ft<sup>3</sup> (about 1,815 yd<sup>3</sup>). Furthermore, the ABC+ mixture will require a period of time to achieve its maximum effectiveness in the subsurface. EPD recommends submittal of a sampling plan to EPD for approval prior to confirmation sampling.

Genuine Parts Company and the professional geologist specified in VIRP are to oversee the implementation of the VIRP in accordance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Genuine Parts Company. However, failure of EPD to respond to a submittal within any timeframe does not relieve Genuine Parts Company from complying with the specified schedule and the provisions, purposes, standards and policies of the Act.

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If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: Jack Wintle, Clearwater Environmental