

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

August 12, 2015

VIA E-MAIL AND REGULAR MAIL

Apollo Industries, Inc.
c/o Ms. Maria Callas
Vice President, EHS
1850 South Cobb Industrial Blvd.
Smyrna, Georgia 30082

Re: First VIRP Progress Report, May 29, 2015
Apollo Industries, Inc. Site, HSI No. 10333
1850 South Cobb Industrial Blvd
Smyrna, Cobb County, Georgia

Dear Ms. Callas:

The Georgia Environmental Protection Division (EPD) has reviewed the First Voluntary Investigation and Remediation Plan (VIRP) Progress Report dated May 29, 2015. EPD appreciates the significant effort that has been expended to develop the plume analytics evaluation for the site. While we see merit in this evaluation, EPD does not accept statistical data, extrapolation, and/or logarithmic interpolation for site delineation purposes. In addition, EPD does not concur that there are three (3) distinct plumes at the site. The evidence for the on-property MW-8 plume and the off-property MW-6 plume being unrelated to the Apollo plume is not compelling enough to distinguish these as separate plumes. While the plume stability evaluation provides a good line of evidence, further verification substantiated by field data from both existing wells and additional wells, is needed to validate the horizontal and vertical extent of impacts.

EPD has noted the following concerns that should be addressed in accordance with the Voluntary Remediation Program Act (the Act) and the schedule provided in Consent Order (CO) No. EPD-VRP-008 in subsequent reporting:

1. Delineation needs to be completed, both on-property and off-property, in the overburden and bedrock groundwater in the following areas.
 - a. Vertical delineation for the site. DW-1 is the only existing bedrock well and the groundwater exceeds delineation criteria.
 - b. Delineation north of and between MW-1 and MW-4 is needed to complete characterization and delineation on the north-northeast side of the property.
 - c. Delineation south of MW-6/MW-15 is needed in both the overburden and bedrock.
2. EPD concurs that soil impacts have been delineated to the north, west, and south with delineation remaining to be completed to the east.
3. As noted in Comment # 4 of the VIRP comments dated June 4, 2014, soil investigation should be conducted around MW-8 to determine if a source exists in this area and/or to

verify the contamination is coming from a potential off-property source. This would be an excellent area to conduct the limited MIP sampling that was proposed in the VIRP. A minimum of four soil samples, at representative depths, should be collected to complete this characterization.

4. As noted in the VIRP, further characterization is required to clarify plume characteristics in the overburden and address data gaps which remain. This includes the proposed MIP locations and overburden monitoring wells (PMW- 16 and 17) shown in Figure 12 of the submitted VIRP and include the area between MW-3 and MW-11 and between MW-3 and MW-4.
5. The schedule shown in Table 8 does not agree with the schedule outlined in CO No. EPD-VRP-008. In accordance with the CO, the CSR is due by July 28, 2019 and not November 2019 as shown. In addition the schedule does not address the following corrective actions which were outlined in the VIRP:
 - a. Soil - Potential expansion of the SVE system beneath the production building where heavily impacted source VOC concentrations have been detected.
 - b. Groundwater – The use of *in-situ* chemical oxidation (ISCO) to address the impacted overburden groundwater zone.
6. MW-1 has had detected concentrations of acetone ranging from 2.9 to 12,000 milligrams per liter (mg/L) over the past 20 years of sampling. In January 2015 the reported concentration was 4.5 mg/L and in April 2015 the result was below the reporting limit of 0.05 mg/L. Please provide an explanation for the anomalous result in April 2015 for MW-1.
7. When the low-flow purge method is used, the USEPA SESD standard operating procedure, Groundwater Sampling (SESDPROC-301-R3), requires that the water level in the well be monitored so that it can be confirmed that drawdown is “slight and stable” to ensure that the water being produced from the well is from the formation. For those wells where the field sampling form had a place to record depth to water, several recorded drawdown greater than 0.33 feet. Please reduce pump speed to limit drawdown to less than 0.33 feet in future sampling events.
8. Figure 2 has a variety of symbols shown on the figure but no information is provided in the legend. Please ensure that all figures have corresponding definitions in the legend for all symbols shown on a given figure. Also, figures showing ‘total VOC’ concentrations are of limited use; concentrations of individual constituents would be more informative.
9. Field Sampling Forms – At least two different versions of field sampling forms were provided in Appendix D. Please ensure the form that is consistently used records the pump intake depth and the depth to water at each data recording interval during the purge.

Apollo 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 Apollo. However, failure of

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

EPD anticipates that the 2nd VIRP Progress Report will be submitted no later than November 20, 2015. If you have any questions regarding this matter, please contact Robin Futch, PG of the Response and Remediation Program at 404-657-8686.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Metzger', with a stylized flourish extending to the right.

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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