

# Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive SE, Suite 1462 East, Atlanta, Georgia 30334-9000

Mark Williams, Commissioner

Environmental Protection Division

F. Allen Barnes, Director

Telephone #404-657-8600 FAX #404-657-0807

March 1, 2011

## MEMORANDUM

**To:** File

**From:** Alexandra Cleary, Program Manager *AC*

**Re:** Meeting on February 25, 2011  
D&H Farms (Former) (fka Production Anodizing) (HSI 10311)  
1460 Industrial Boulevard, Adel, Cook County, GA

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On Friday, February 25, 2011, the following persons met to discuss the status of the voluntary remediation program application for the above referenced site:

<u>Name</u>	<u>Affiliation</u>
Mark Smith	EPD
Alexandra Cleary	EPD
David Brownlee	EPD
John Stuckey	Representative for VRP Applicant
William (Bill) Harris	Consultant for VRP Applicant

Mr. Stuckey and Mr. Harris were informed the application was incomplete for the following reasons:

**Warranty Deed:** A legal description and Deed to Secure Debt were included, but a Warranty Deed was not provided

**Delineation Criteria:** Delineation Criteria was not provided. It was also noted that the Delineation Criteria should be submitted for speciated chromium as former manufacturing at the site involved plating operations and the Type 1 RRS for trivalent and hexavalent chromium in soil and groundwater is the detection limit.

**Voluntary Investigation and Remediation Plan (VIRP):** The current VIRP stated the onsite production/former drinking water wells would be closed. The VIRP needed to be expanded to include additional investigation and remediation as follows:

- Current soil data was not speciated. Chromium in soil needs to be speciated and the soil contamination needs to be delineated to a standard under the Voluntary Remediation Program Act. Cleanup standards need to be developed for speciated chromium and, if necessary, soil exceeding the cleanup standards must be remediated.

- Groundwater needs to be delineated to a standard under the Voluntary Remediation Program Act.
- The VIRP needs to state a model is being used to demonstrate the contamination will not reach a receptor. A point of exposure and point of demonstration well need to be established. The use of BioScreen AT as an appropriate model for chromium needs to be justified or another model used. The appropriate model must then be validated with actual groundwater results at appropriate locations.
- Propose an environmental covenant

During discussions, it was noted that the sampling performed for the Phase 3 report was limited to arsenic only. The narrative associated with the former RCRA regulated units (surface impoundment and clarifier) was limited and if there were any questions regarding that matter, appropriate internal RCRA personnel would be contacted for clarification. The typographic error in Section 2.4.1 relating to the designation of the waste sample was to be corrected.

We also discussed Brownfield application, current deadlines established by SBA/FDIC, and foreclosure by the bank.

At the conclusion of the meeting, it was agreed that Mr. Harris would be revising the application for submittal on Monday, February 28, 2011, EPD would expedite review (working with Mr. Harris if additional revisions were required), and provide an approval letter for Mr. Stuckey to provide to bank personnel at a meeting on Wednesday, March 2, 2011.

Follow-up:

On Monday, February 28, 2011, Ms. Cleary was informed in a telephone conversation with Mr. Harris that a revised application was not going to be submitted that day, as there were still concerns by Mr. Stuckey regarding the requirement for validation of the model.

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