

Environmental Protection Division

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Judson H. Turner, Director

Land Protection Branch

Phone: 404/657-8600 FAX: 404/657-0807

October 11, 2013

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

COPY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAILED
10-11-2013

Re: Conditional Approval of Entry Into Voluntary Remediation Program
Rayloc Facility, HSI Site No. 10547
600 Rayloc Drive, Atlanta, Georgia; Fulton County
Tax Parcel ID No. 14F-0053-LL-008-5

Dear Mr. Lewis:

The Georgia Environmental Protection Division (EPD) approves your Voluntary Investigation and Remediation Plan (VIRP) received On January 15, 2013. Genuine Parts Company is a participant as defined in the Voluntary Remediation Program (VRP) for the following qualifying property:

Rayloc Facility
Atlanta, Georgia; Fulton County
Tax Parcel ID No. 14F-0053-LL-008-5

The approved VIRP specifies corrective action consisting of the following:

- Treatment of contaminated groundwater and soil in and near the former waste-pit area with gas-infusion technology, with the objective of achieving Type 3 risk reduction standard (RRS) concentrations in both mediums.
- A DNAPL source-zone investigation will be conducted and, if necessary, appropriate corrective action will be proposed and implemented.
- Soil conditions in eight documented source areas will be assessed and, if necessary, corrective action will be proposed and implemented to eliminate source material and to bring soil within Type 3 or Type 4 RRSs.

EPD notes that the Rayloc Facility was accepted into the State of Georgia Brownfields Program. The Brownfields corrective-action requirements and deadlines, as specified in the PPCAP and LOL, will supersede VRP corrective-action requirements and deadlines, if a conflict between Brownfields and VRP requirements and deadlines exists.

Schedule

- Semiannual progress reports are to be submitted to EPD. Each progress report must describe all actions taken since the last submittal, and include certification by the professional engineer/geologist specified in the VIRP along with a monthly summary of hours invoiced and description of services provided since the last submittal.
- The reporting schedule will be April 11 and October 11 annually, beginning in 2014 and ending in 2018, unless a compliance status report (CSR) is submitted and approved prior to 2018.

- A CSR including certifications should be submitted by October 11, 2018.

In addition to the reporting schedule specified above, the following must be included in the April 11, 2016, progress report:

- Demonstration of complete horizontal and vertical delineation, finalize the remediation plan and provide a cost estimate for implementation of remediation and associated continuing actions. EPD recommends that the participant finalize approval of cleanup standards, if applicable, for all regulated substances prior to this submittal.

Conditions of VIRP Approval

1. Genuine Parts Company must evaluate the vapor-intrusion pathway for all buildings located over the dissolved contaminant plume. EPD is concerned that vapors from chlorinated solvents in groundwater could potentially migrate into the former manufacturing building on site, and into buildings on downgradient properties as well. An EPA-approved or otherwise peer-reviewed vapor-intrusion model, such as Johnson & Ettinger, should be used. If the vapor-intrusion pathway has already been evaluated, please include that data, associated calculations, and a summary of findings in the first VRP semiannual report of April 11, 2014.
2. No point of exposure (POE) or point of demonstration (POD) was specified in the VIRP with regard to contaminated groundwater. In accordance with provisions of the Act, please specify a POE and a POD.

The VRP Act requires that Genuine Parts Company and the professional engineer/geologist specified in the VIRP 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. Should Genuine Parts Company fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program.

If you have any questions, please contact Allan Nix at (404) 657-3935.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

File: HSI No. 10547
c: Jack Wintle, Sage Environmental