

Georgia Department of Natural Resources

Environmental Protection Division

2 Martin Luther King, Jr. Dr., S.E., Suite 1054 East, Atlanta, Georgia 30334

Judson H. Turner, Director

Land Protection Branch

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

February 3, 2014

COPY

CEA, LLC

W. Craig Baker

633 Chestnut Street, Suite 1640

Chattanooga, Tennessee 37450

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Re: Comments on VRP Semiannual Reports 1, 2, 3,4, Soil Sampling Work Plan dated July 2012, and Draft Environmental Covenant of October 18, 2013
Capitol USA – Dalton Adhesives, HSI Site Number 10795
Dalton, Georgia; Whitfield County

Dear Mr. Baker:

The Georgia Environmental Protection Division (EPD) has completed its review of the above-referenced documents, submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act.) Our comments are provided below.

1. EPD has decided that the SSL_{mod} values are acceptable for use as target remedial concentrations for source material at this site. Specifically, the SSL_{mod} values approved by EPD are 7.5 mg/kg for PCE; 7.0 mg/kg for TCE; and 16.0 mg/kg for 1,1,1-TCA.
2. The Preliminary Source Remedial Action Plan, as presented in Section 5.3 of VRP semiannual progress report 3, dated April 2013, is acceptable to EPD. However, confirmation sampling within the remediated areas will be required, regardless of whether Option A, Option B, or both are selected.
3. The risk reduction standard (RRS) values for soil and groundwater, as presented in Table 1 in the appendix of VRP semiannual progress report 1, dated April 2012, are acceptable to EPD.
4. If specific values of vertical groundwater gradients on site become useful in the future, EPD notes that the range of vertical gradients between MW-2 and MW-2D should be 0.006 to 0.032 on August 23, 2012, and 0.013 to 0.079 on August 5, 2013 (Page 9 in VRP semiannual progress report 4, dated October 2013, using the EPA on-line vertical gradient calculator specified therein).
5. Regarding Section B.7.2 of the Conceptual Site Model, presented in Appendix B of VRP semiannual progress report 4, dated October 2013:
 - i. EPD concurs that vapor intrusion should be evaluated at the site, concurrent with the evaluation of the remedial action. Should the on-site building no longer be used for manufacturing at some point in the future, OSHA air-monitoring requirements may not apply.
 - ii. EPD concurs that the potential risk to construction workers coming into contact with contaminated groundwater, vadose-zone soils, or source material should be evaluated, in the event that the existing concrete cap or gravel cover is disturbed by future renovations on site.

6. Based upon historical analytical data obtained from MW-3, MW-3D, and MW-3B, EPD agrees that contaminant concentrations in groundwater are decreasing with increasing depth below the ground surface. At this time, EPD will not require installation of an additional deep well for vertical delineation, but we may require an additional deep well in the future, if justified by site conditions.
7. Please note that the US EPA Region 4 groundwater-sampling-operating-procedure document has been updated. This document, Procedure SESDPROC-301-R3, "Groundwater Sampling," effective March 6, 2013, can be accessed on the Internet at <http://www.epa.gov/region4/sesd/fbqstp/>.
8. With regard to the draft environmental covenant to QEP, Co., Inc., the current on-site tenant, EPD's comments are as follows:
 - i. The EPD mailing address, everywhere it is presented in the document, should specify Suite 1054, East Tower.
 - ii. The names of the grantor and grantee and holder should be specified within the document, wherever indicated in the EPD Model Covenant.
 - iii. The text on Page 2, under "Name and Location of Administrative Records," should read as follows:

The corrective action at the Property that is the subject of this Environmental Covenant is described in the following documents:

- *Revised Voluntary Remediation Program Application
Capitol USA-Dalton Adhesives
May 2011*
- *Voluntary Remediation Program Semiannual Progress Report
Capitol USA-Dalton Adhesives
(first report was submitted to EPD in April 2012)*
- *Voluntary Remediation Plan Compliance Status Report
Capitol USA-Dalton Adhesives
<Insert Date Here>*

These documents are available at the following location:

*Georgia Environmental Protection Division
Response and Remediation Program
2 MLK Jr. Drive, SE, Suite 1054, East Tower
Atlanta, Georgia 30334*

- iv. On Page 2, under "Description of Contamination and Corrective Action," in the second paragraph, the following should be included as the second and third sentences, in accordance with the EPD Model Covenant:

This Environmental Covenant is required because a release of <list regulated substances> occurred on the Property. <list regulated substances> are "regulated substances" as defined under the Georgia Hazardous Site Response Act, O.C.G.A. § 12-8-90 et seq., and the rules promulgated thereunder (hereinafter "HSRA" and "Rules", respectively).

The complete list of regulated substances released at the property should be used to fill in the angle brackets above. That list is on the site's HSI summary sheet, which can be found on the Internet at:

http://www.gaepd.org/Files_PDF/gaenviron/hazwaste/hsi_700-799.pdf

- v. On Page 2, under “Description of Contamination and Corrective Action,” the third paragraph should read as follows:

The Corrective Action consists of the installation and maintenance of institutional controls to protect human health and the environment, as specified below in the description of the Activity and Use Limitations and Continuing Obligations, along with those obligations pursuant to the site’s enrollment in the State of Georgia Voluntary Remediation Program.

- vi. On Page 4, under “Activity and/or Use Limitation(s) and Continuing Obligations,” Item 2 should read as follows:

Notice. The Owner of the Property must give thirty (30) days advance written notice to EPD of the Owner’s intent to convey the Property to a new owner. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Corrective Action, and the continuing obligations hereunder.

- vii. On Page 4, under “Activity and/or Use Limitation(s) and Continuing Obligations,” Item 5b should read as follows:

If construction, utility, or repair workers require access to subsurface areas where contamination exists (as denoted on Exhibit B), such that any cover then in place (such as pavement, concrete, buildings, etc.) are to be removed, then proper precautions shall be taken to protect those workers under a construction worker risk scenario as specified in the Act, or by OSHA if a Hazard Communication Program is in effect for the site.

- viii. On Page 4, under “Activity and/or Use Limitation(s) and Continuing Obligations,” Item 6, which requires that a permanent marker be installed on site, can be deleted.

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

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: Roy Barrett, Barrett Properties LLC
Kirk Kessler, EPS (via email)