

Georgia Department of Natural Resources

Environmental Protection Division

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Judson H. Turner, Director

Land Protection Branch

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

February 26, 2015

CEA, LLC

W. Craig Baker

633 Chestnut Street, Suite 1640

Chattanooga, Tennessee 37450

VIA EMAIL AND FIRST-CLASS MAIL

COPY

Re: Comments on VRP Semiannual Reports 5 and 6
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 Voluntary Remediation Program (VRP) Semiannual Report 5, dated May 2014, and VRP Semiannual Report 6, which consists of a letter dated September 23, 2014. These documents were submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). Our comments are provided below.

1. Regarding the vapor intrusion (VI) pathway, discussed in Section 4.2 of Semiannual Report 5:
 - a. According to the VISL User's Guide, dated May 2014, the use of the US EPA VISL screening model to evaluate target groundwater concentrations at sites with a depth to groundwater less than 5 feet is likely to be inappropriate. Given the site's history of artesian flow and a shallow water table, the usefulness of VISL to evaluate VI risk on site is questionable.
 - b. Given the presence of active air monitoring at the site under an OSHA HAZCOM program, further evaluation of VI will not be required at this time. However, potential VI in the on-site building must be addressed in the Uniform Environmental Covenant (UEC), which would go into effect at the completion of corrective action and prior to the site's delisting from the Hazardous Site Inventory. The covenant should specify the need for a VI evaluation of PCE, TCE, and VC if periodic OSHA air monitoring for volatile organic compounds in the on-site building is discontinued.
2. Please include a draft UEC in the VRP Compliance Status Report (CSR). The UEC should include:
 - a. The VI evaluation requirement specified in Comment 1(b) above
 - b. A figure indicating areas of contamination that will need to be specified in a site-specific Health and Safety Plan
 - c. The revisions to the UEC suggested by EPD in our comment letter of February 3, 2014
3. Regarding the direct contact pathway, discussed in Section 4.3 of Semiannual Report 5:
 - a. **Skin Surface Area (SSA)** – An SSA of 1,306 cm² was proposed for the construction worker \ receptor. Please note that pursuant to U.S. EPA's memorandum, *Human Health Evaluation Manual, Supplemental Guidance: Update of Standard Default Exposure Factors* (EPA, 2014), an SSA of 3,470 cm² is recommended for onsite outdoor workers. This value is the weighted average of mean values for head, hands, and forearms (male and female, 21+ years). The dermal risk-based concentrations should be recalculated using the updated value.

- b. **Water Ingestion Rate (IR_w)** – An IR_w of 0.02 L/day was proposed for the construction worker. It is EPD's policy to assume an incidental ingestion rate of 0.1 L/day for this receptor based on reasonable maximum exposure.
 - c. **Exposure Frequency** – The site presents media and route-specific risk-based concentrations calculated over a range of exposure frequencies (EFs). It should be noted that EPD does not require calculation of risk-based concentrations for a range of EFs, but rather recommends calculation of protective soil and groundwater remedial levels based on a proposed exposure frequency which may take into consideration work activities expected to be conducted by the construction worker. Typically, an exposure frequency within 90-125 days/year is deemed appropriate for a future construction worker.
 - d. **Inhalation of Volatiles in Outdoor Air Pathway** – It was noted that potential risk from the inhalation of volatiles in outdoor air was not determined. Given this is a potentially complete exposure pathway for construction workers directly exposed to the subsurface, a quantitative evaluation of this pathway must be conducted.
 - e. EPD notes that the table at the top of page 11 of Semiannual Report 5 indicates post-excavation aquifer-matrix concentrations for PCE, TCE, and 1,1,1-TCA in excess of the agreed-upon SSL_{mod} values of 7.5 milligrams per kilogram (mg/kg), 7.0 mg/kg, and 16.0 mg/kg, respectively. The target remedial concentrations should be at or below the agreed-upon SSL_{mod} values. Please provide a table in the next report listing actual post-excavation concentrations of those substances in the aquifer matrix.
4. VRP Semiannual Report 6, which, with EPD's approval, was submitted as a letter, stated that implementation of the final remediation plan was forthcoming. EPD has corresponded with EPS via email on several occasions regarding requirements for the final remediation plan and the upcoming VRP CSR. Those emails, from 2014, are dated March 19, September 12, October 15, and October 21. Our review of the VRP CSR will be based in part upon adherence to requirements specified by EPD in those emails.

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: Timmerly Bullman, EPS (via email)