



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

August 31, 2017

Metalplate Galvanizing Corp.
c/o Mr. Adam Brown
500 Selig Drive
Atlanta, Georgia 30336

RE: Voluntary Investigation and Remediation Plan-Ninth Progress Report
Metalplate Galvanizing Facility, HSI # 10204
Atlanta, Fulton County, Georgia 30336

Dear Mr. Brown:

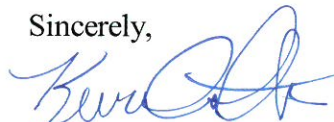
The Georgia Environmental Protection Division (EPD) has completed its review of the Voluntary Investigation and Remediation Plan (VIRP) Ninth Progress Report dated April 14, 2017, which includes the Annual Groundwater and Surface Water Monitoring/Corrective Action Effectiveness Report, Sediment Zinc Solubility and Treatability Studies and the Final Remediation and Implementation Plan submitted for the Metalplate Galvanizing site located in Atlanta, Georgia. Based on EPD's review of the above referenced documents, EPD approves the implementation of the Final Remediation and Implementation Plan, and has prepared the following comments:

1. EPD concurs that at this time an additional monitoring well west of the eastern detention pond is not necessary.
2. EPD acknowledges that Metalplate will be re-engaging the Aston Investment Property with the intention to purchase Parcel ID 14-0059-LL-017 from Aston Investment Corporation to further address the release of the chemicals of interest (COI) on this parcel. If Metalplate decides not to purchase the affected parcel, please indicate your proposed course of action as Aston Investment Corporation, in previous communications dated December 23, 2008, has stated that they "may use its property for residential purposes and will not agree to limiting use of its property to non-residential."
3. According to the Sediment Zinc Solubility and Treatability Studies in Appendix B, total zinc in Table 3 is comprised of almost all of dissolved zinc in groundwater. Therefore, it is necessary to analyze for both dissolved and total zinc in both surface water and sediment samples taken in the above study, which also give an indication of the flocculation that exists due to retention and release of zinc to surface water.
4. According to the Treatability Study in Appendix B, the objective in this study is to treat the sediment/surface water by increasing the pH levels based on the results of the Solubility study. In support of these remedial objectives, EPD requests that the following comments be addressed during future remedy implementation.

- a. No mention was made as to the frequency of treatments since buffer solutions can be quickly diluted and washed away by rain and storm water drainage.
- b. Please provide the associated amendments used in the treatment and any information regarding amendments that may be planned to be introduced into the aquifer, depending on the depth of treatment, during the treatment processes.
- c. Soil and sediment pH, which you plan to control by using buffers, must be monitored since zinc-organic complexes can become soluble and increase their mobility.
- d. In the remedial design plan please include a capture mechanism or removal plan for the accumulation of zinc impacted sediment in the treatment areas. Please ensure that the relevant permits are acquired if the reagents used in the surface water and sediment treatments require a permit.

EPD concurs that the annual groundwater and surface water sampling be continued in accordance with Schedule A within Consent Order EPD-VRP-010. Also, in accordance with Schedule A EPD anticipates receipt of the next progress report by October 20, 2017, which should include the results of the Post Implementation Sampling Event with surface water sampling and elevation measurements. If you have any questions, please contact Montague McPherson of the Response and Remediation Program at (404) 657-0483.

Sincerely,



Kevin Collins
Unit Coordinator
Response and Remediation Program

c: James D. Levine, McKenna Long & Aldridge LLP (on behalf of Aston Investment Corp.)
Frances Carpenter, Non-Point Source Program, WPB

File: HSI # 10204, Metalplate Galvanizing Corp

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