Georgia Department of Natural Resources
Environmental Protection Division-Land Protection Branch
2 Martin Luther King, Jr. Dr., Suite 1054 East, Atlanta, Georgia 30334
(404) 657-8600; Fax (404) 657-0807
Judson H. Turner, Director

July 12, 2016

VIA E-MAIL AND REGULAR MAIL

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

RE: Voluntary Investigation and Remediation Plan-Eighth 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) Eighth Progress Report dated February 12, 2016, which includes the Annual Groundwater and Surface Water Monitoring/Corrective Action Effectiveness Report submitted for the Metalplate Galvanizing site located in Atlanta, Georgia. Our comments on the Progress Report are provided below:

1. Based on the results presented in the 8th VRP Progress Report (PR-8), EPD agrees that the electrocoagulator system has significantly reduced the concentration of zinc in storm water and groundwater.

2. Metalplate submitted a recent evaluation of the Selig Pond sediments by Applied Aquaculture & Environmental Technologies, LLC (A2E), in which A2E recommended two assessment items be studied before a full evaluation of sediment remedies be done. The two assessment items recommended to be studied are (1) the mobility of zinc in the sediments relative to local groundwater and (2) the subsequent potential for the groundwater in the vicinity of Selig Pond to affect zinc concentrations in surface water, including in particular the relative contribution from groundwater to surface water flow volume within the ditch system. EPD agrees with the recommendations and looks forward to receiving the evaluation results in the next report.

3. Please provide justification for not collecting an additional sediment sample between A+20 and A+30, as the distance between sample locations is approximately eighty feet and groundwater flow is to the southeast. In addition, please describe the criteria used to determine the area where sedimentation stopped occurring south of the pond.

4. According to the groundwater sampling field log for MW-13D, the screened interval is 51-53 feet below ground surface. The log indicates that the sampling method utilized a low-flow sampling using a peristaltic pump. For wells screened greater than 30-feet, low-flow sampling would not be applicable. Per the EPA Region 4 SESD guidance 3-5 well volumes

should be purged from the wells or use an alternate pump. Please follow the procedures consistent with those described in the SESD groundwater sampling operating procedures, currently SESDPROC-301-R3 (effective March 6, 2013).

5. EPD concurs that dissolved zinc concentrations are generally decreasing in surface water sampling wells. However, there is an approximately three-fold increase in the concentration of dissolved zinc observed in SW-5 from the 2014 to the 2015 sampling event. If this trend continues additional corrective action may have to be implemented.

In accordance with the schedule established in Schedule A within Consent Order EPD-VRP-010, EPD anticipates receipt of the next progress report by February 14, 2017, which should include the results of the sediment evaluation. If you have any questions, please contact Montague M^{c}Pherson of the Response and Remediation Program at (404) 657-8600.

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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