



June 29, 2018

BFEL Indemnitor, Inc.
c/o Chris Aupperle
One ConAgra Drive
Omaha, NE 68102-5094

VIA EMAIL and REGULAR MAIL

Re: VRP Status Reports #10, #11 and #12
Estech General Chemicals Site, HSI Site No. 10196
Atlanta, Fulton County, Georgia
Tax Parcels 17-0191-LL0244 and 17-0191-LL0400

Dear Mr. Aupperle:

The Georgia Environmental Protection Division (EPD) has received and reviewed the VRP Status Report # 10, # 11 and # 12 dated February 8, 2017, August 8, 2017, February 22, 2018, respectively, that have been submitted by AMEC on behalf of BFEL Indemnitor, Inc. (BFEL) for the Estech General Chemicals Site. EPD provides the following comments:

Response to EPD September 22, 2016 Comments on Status Reports # 6 through # 9 in Appendix C of the VRP Status Report # 10

1. Response to Comment # 1:
Noted and accepted.
2. Response to Comment # 2:
EPD concurs with deferring the installation of vertical delineation well until after groundwater remediation is implemented.
3. Response to Comment # 3:
EPD concurs with removing monitoring well MW-105 from point of demonstration (POD) well list and using MW-117 as an alternative. While it is not ideal to have constituents at POD wells exceed concentrations at the point of exposure (POE), based on their hydraulically upgradient position and near surface water level screen intervals, EPD concurs with the use of monitoring wells MW-119 and MW-120 as POD wells. EPD requests that MW-121 continue to be used as a POD well based on its close proximity to the POE and hydraulically upgradient position. Please adjust figures to show the four POD wells in future reports.
4. Responses to Comment # 4 and # 5:
Decisions related to area averaging will be made by the newly assigned compliance officer and manager from the VRP unit. The transfer of this site to the VRP unit will be effective July 1, 2018.

EPD Comments on VRP Status Reports # 10, # 11 and # 12:

5. Groundwater Concentrations in the former pond area in the vicinity of monitoring wells OW-1, OW-2 and OW-3 may be indicative of a separate source area not linked to offsite contamination from the adjacent M&J Solvents HSI site. Please continue to monitor the wells in the former pond area and wells hydraulically downgradient of the former pond area for VOCs. Should this be a separate source area, plume monitoring and source area/groundwater remediation will need to be addressed separately from the offsite contamination to the north.
6. Monitoring well MW-120 detected cis-1,2-dichloroethene and trichloroethene, and MW-121 detected trichloroethene during the most recent November 2017 sampling event. Should VOC concentrations increase in wells MW-120 and MW-121 to levels that exceed Georgia Instream Water Quality Standards (ISWQS), VOCs may need to be added to the surface water sampling analyte list.
7. EPD concurs with the proposed future actions presented in VRP Status Reports #10, #11, and #12 and the revised remediation approach presented in Section 3.4 of the VRP Status Report #12.
8. Please be advised that the submittal of the final Compliance Status Report has far exceeded the 5-year time frame of February 8, 2017. Therefore, EPD may issue a VRP Consent Order to establish a compliance schedule for continued participation in the VRP in accordance with the Act. This would be sent to BFEL under separate letter by the VRP unit.

Please address the above comments in your next VRP Status Report due August 1, 2018. Also should BFEL wish to set up a meeting to discuss area averaging issues or other comments, please contact Mr. David Hayes, the unit coordinator of VRP unit, at 404-657-8600.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Gregory Wrenn, AMEC

File: HSI 10196