

October 11, 2013

Robert Lewis
Genuine Parts Company
2999 Circle 75 Parkway
Atlanta, Georgia 30339

COPY

MAILED
10-11-2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: EPD Comment Letter
Voluntary Investigation and Remediation Plan, Response to EPD Conditional CAP
Approval, and CAP Performance Management Plan
Rayloc Facility, HSI Site No. 10547
600 Rayloc Drive, Atlanta, Georgia; Fulton County
Tax Parcel ID No. 14F-0053-LL-008-5

Dear Mr. Lewis:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated July 3, 2013, and received by EPD on July 10, 2013. The VIRP was submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). We have also reviewed the Response to Conditional Approval of Corrective Action Plan, dated, August 20, 2012, and the CAP Performance Management Plan (PMP) dated December 17, 2012. Our comments are provided below.

VIRP

- 1) The Type 1/Type 3 risk reduction standards (RRSs) for groundwater listed in the table on page 2-10 are correct, with the following exceptions:
 - a. The Type 3 groundwater RRS for cis-1,2-dichloroethene (DCE) should be 70 micrograms per liter (ug/L).
 - b. Tetrachloroethene (PCE) is listed twice, with accompanying Type 3 groundwater RRSs of 5 ug/L and 1,000 ug/L. The correct Type 3 groundwater RRS for PCE is 5 ug/L. Toluene, a constituent of concern on site which was not listed in the table, has a Type 3 groundwater RRS of 1,000 ug/L.
- 2) The previously approved Type 3 RRSs for soil listed in the table on page 2-11 are correct, with the following exceptions:
 - a. The Type 3 soil RRS for cis-1,2-DCE should be 7 milligrams per kilogram (mg/kg).
 - b. The Type 3 soil RRS for styrene should be 14 mg/kg.
- 3) EPD notes that the VIRP made no mention of the adjoining RentRite facility or other impacted downgradient properties. If no application is submitted to EPD to include those properties as qualifying properties under the Rayloc Facility VIRP, then those properties will be subject to cleanup under HSRA standards. Within six months of detecting a regulated substance(s) on a non-qualifying property, the participant must apply to EPD to include the affected property as a qualifying property under the Act or notify EPD the non-qualifying property is not included under the Act.

Response to Conditional Approval of CAP

- 4) Former well MW-6 was located near the southwestern corner of the RentRite property. As opposed to replacing that well, please install a well near the southeastern corner of the RentRite property. EPD believes that groundwater contamination from the former waste-pit area is most likely to have migrated to the southeastern part of the RentRite property. If groundwater contamination is discovered in the new well at concentrations above the applicable RRSs, installation of one or more additional delineation wells may be required.

CAP PMP

- 5) EPD agrees that reductive dechlorination appears to be occurring in the site subsurface. PCE concentrations observed in monitoring well PT-3 may decrease as the upgradient source area is remediated. PT-3 should remain in place and be incorporated into the VRP semi-annual monitoring program.
- 6) In the first VRP semi-annual report, please submit the following:
 - a. A plat depicting the locations of the existing pilot-test injection wells. To assist EPD in determining the injection-well locations, please enlarge a portion of an existing figure in a map insert.
 - b. Monitoring well construction schematics for the four pilot-test injection wells.
 - c. A plat depicting the locations of all 22 injection wells proposed in the March 8, 2012, CAP. Specify which of the injection wells have already been installed.
 - d. Monitoring well construction schematics for all newly installed injection wells.

The above comments must be addressed 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 Genuine Parts Company. However, failure of EPD to respond to a submittal within any timeframe does not relieve Genuine Parts Company from complying with the provisions, purposes, standards, and policies of the Act.

Should you have any questions or concerns regarding this matter, please contact Allan Nix of the Response and Remediation Program at (404) 657-3935.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

File: HSI No. 10547
c: Jack Wintle, Sage Environmental