

February 19, 2019

VIA EMAIL AND U.S. MAIL

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

Re: Comments on Voluntary Remediation Program Semiannual Report 9
Rayloc Facility, HSI Site Number 10547
Atlanta, Georgia; Fulton County

Dear Mr. Lewis:

The Georgia Environmental Protection Division (EPD) has completed its review of the above-referenced document, which was submitted to EPD pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100. EPD has the following comments:

1. In future reports, please ensure that units are included on all figures showing sampling data. There are no units provided for soil gas detections in Figure 2 or PCE groundwater concentrations in Figures 8 and 9.
2. It appears there has been significant rebound in RAD-5 since the October 2015 sampling event. In addition to elevated concentrations of cis-1,2-DCE, PCE, TCE and vinyl chloride, several other constituents of concern (COC) were reported above applicable RRS. Please add appropriate COCs to compliance sampling results as shown on Figure 5 if concentrations continue to remain above respective RRS values. The additional COCs include 1,1-DCE, benzene, methylene chloride, trans-1,2-DCE, 1,1,2,-TCA, 1,1,2,2-tetrachloroethane.
3. Trans-1,2-DCE was detected in the December 2017 sampling results in ADD-1 at a concentration of 0.773 mg/kg; however, there is no indication of this in Table 2. Additionally, the format of Table 2 is difficult to read due to the analytes only being presented on the first page. Subsequent pages of Table 2 have "Table 1 (continued)" in the header. There are no units for sample depths presented. Please add the column of analytes to every page of the table, update the headers, and add units accordingly.
4. On Figure 4 and Table 5, MW-25 is indicated as "NS" (not sampled). However, lab results from September 2017 show that MW-25 was analyzed, and concentrations of regulated constituents were all Below Detection Limits. Please reconcile this discrepancy in future reports.

5. It is unclear as to the location of the former parts disassembly and cleaning area (PDA) as shown on Figure 3 because it is not shown on any additional figures. Please provide some frame of geographical reference for the PDA on either the site location map or larger figures.
6. The report is missing any tabulated laboratory data (e.g. Table 4 or 5) for the following wells: MW-20, MW-21, MW-22, MW-23 and PT-3.
7. Please note the following typographical errors:
 - a. Table 2: The December 2017 WD-2 result for 1,2-DCA is shown as 0.682 mg/kg. However, this is not consistent with laboratory data. The laboratory data shows that the concentration of cis-1,2-DCE is 0.628 mg/kg, not <0.222 mg/kg. Please correct these values in future reports.
 - b. Table 5: The column labeled trans-1,2-dichloroethane should be *ethene*.

Genuine Parts Company must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards, and policies of the Act. The next progress report is due by April 11, 2019. If you have any questions, please contact Nicole Vermillion of the Response and Remediation Program at (404) 232-7891.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

c: Jack Wintle, Clearwater Environmental Resources (via email)