



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

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Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

February 2, 2018

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

VIA EMAIL AND FIRST-CLASS MAIL

Re: Comments on Voluntary Remediation Program Semiannual Reports 4, 5, 6, 7, 8, and Performance Management Plan (PMP) of 11-12-2015
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 documents. The documents were submitted to EPD pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100. Our comments are provided below.

1. Regarding the PMP, EPD would prefer that compliance wells be sampled at least annually. Otherwise, the specified reporting frequency, sampling points, and analytical parameters are acceptable.
2. PCE concentrations in some wells on site, especially MW-21 and PT-3, continue to suggest the presence of DNAPL in the subsurface. EPD notes that if DNAPL has migrated through the soil profile into underlying fractured bedrock, technical challenges associated with groundwater-contaminant-source remediation could be considerable. EPD anticipates that future groundwater monitoring, subsequent to planned soil blending in the former waste-pit area, will provide needed clarity as to whether DNAPL is present in bedrock on site; if necessary, remedial efforts should be modified accordingly.
3. Pursuant to EPD's email of February 15, 2016, the use of passive diffusion bags (PDBs) for periodic groundwater sampling at the site is approved. However, as stated in that email:
 - a. When certifying to risk reduction standards (RRSs), a traditional sampling method involving a pump or bailer must be used. A groundwater pump must have Teflon tubing and bailers must be made of Teflon.
 - b. A PDB should remain in a well at least two weeks before being sampled; a longer duration may be preferable due to the low-permeability soils on site.
 - c. The PDBs should be suspended within the screened interval, and new PDBs must be suspended at the same depth as the previous PDBs, unless available data suggests one or more PDBs should be repositioned.
 - d. A groundwater sampling field log will still be necessary for each well sampled. Along with the usual considerations regarding the well ID, sampling date, and height of the water column, the field log should indicate the PDB brand name, the date the

PDB was installed, the depth at which the PDB was suspended, the depth to the top and bottom of the screened interval, and the condition of the PDB when retrieved.

- e. Each report that includes groundwater sampling should contain a narrative detailing the groundwater-sampling protocol.
 - f. If analytical data associated with PDB sampling significantly conflicts with historical data from traditional groundwater sampling, EPD may revisit its decision to allow the use of PDBs on site, may reevaluate how PDBs are being deployed, or may decide to disallow previously obtained analytical data associated with PDB sampling.
4. Given the low permeability of site soils and the accompanying, relatively small radius of influence that would be expected, the viability of ISCO and SVE as long-term remedial measures are in question. Additional remedial options may need to be evaluated for a more timely cleanup of site soil and groundwater.
 5. During future groundwater sampling events where an active sampling method is utilized, please include the depth of the pump intake and the depths to the top and bottom of the screened interval on all groundwater sampling logs.
 6. On a figure or figures in future reports, please depict the locations of injection wells in the former waste-pit area, on the downslope railroad-spur area, and in the area south of Wendell Drive.

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. 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.

If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

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