

# 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

March 14, 2014

### VIA E-MAIL AND REGULAR MAIL

Lafarge Road Marking, Inc.  
c/o J. C. McCarthy, President  
Lafarge N. A.  
12950 Worldgate Drive  
Herndon, VA 20170

**COPY**

Re: Voluntary Remediation Program Application, August 15, 2013  
Lafarge Road Marking, Inc.  
2675 North Martin Street  
East Point, Fulton County, Georgia  
Tax parcel ID 14 0156 LL0293

Dear Mr. McCarthy:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) and application dated August 15, 2013, submitted for the above referenced property (the property) pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has determined that the property is eligible for enrollment into the Georgia Voluntary Remediation Program (VRP). Transmitted herewith, please find a proposed consent order that, when executed, will supersede the original consent order, Consent Order EPD-HW-562, under which clean-up of the property has been regulated. Execution of the proposed consent order will approve the VIRP and enroll the property in the VRP.

As part of the VIRP review, EPD also reviewed the Indoor Air Vapor Intrusion Report dated January 17, 2011 (IAVI Report), the Data Report for May 2013 Groundwater Sampling and Analysis, the Data Report for October 2013 Groundwater Sampling and Analysis, and the Annual Corrective Action Effectiveness Report – 2012. EPD's comments on the VIRP and the above referenced documents are attached. As specified in the proposed consent order, these comments must be addressed to EPD's satisfaction in future progress reports.

Please sign and date the proposed consent order and return it to this office by April 30, 2014. Upon receipt of the signed consent order, EPD will issue a public notice providing for a thirty (30) day comment period pursuant to Chapter 391-1-3-.01, "Public Participation in Enforcement of Environmental Statutes," prior to execution of the consent order. If EPD does not receive any substantive comments, the order will be executed and the property will be enrolled in the VRP. EPD will forward a copy of the executed consent order to you. If you have questions regarding the proposed order or comments, please contact Jason Metzger at 404-657-8610.

Sincerely,

  
Jeffrey W. Cown, Chief  
Land Protection Branch

Encl: Proposed Consent Order  
EPD Comments on VIRP and other referenced documents

C: Adam Sowatska (via email – w/enclosures)  
David Wilderman, ARCADIS (via email – w/enclosures)

File: Lafarge Road Marking, Inc. – VRP  
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# ATTACHMENT

## EPD Comments on VIRP and other referenced documents

Lafarge Road Marking, Inc.  
2675 North Martin Street  
East Point, Fulton County, Georgia  
March 14, 2014

EPD offers the following comments on the Voluntary Investigation and Remediation Plan (VIRP) dated August 15, 2013; the Indoor Air Vapor Intrusion Report dated January 17, 2011 (IAVI Report); the Data Report for May 2013 Groundwater Sampling and Analysis; the Data Report for October 2013 Groundwater Sampling and Analysis; and the Annual Corrective Action Effectiveness Report – 2012:

1. As defined in Section 12-8-102(b)(1) of the Voluntary Remediation Program Act (Act), available clean-up standards under the Voluntary Remediation Program (VRP) are the same as those defined in the Hazardous Site Response Act (HSRA). HSRA clean-up standards are known as Risk Reduction Standards (RRS, see Georgia EPD Rules for Hazardous Sites Response – Risk Reduction Standards: 391-3-19-.07) and are calculated based on either standardized exposure assumptions and defined level of risk or site-specific risk assessment. Methods of calculating RRS values are provided at <http://www.gaepd.org/Documents/hsraguideCSRRRS.html>. Clean-up standards for this site should be calculated using the methods described in the above cited reference, in lieu of the techniques described in Section 4.6 of the VIRP.
2. Available delineation standards under the VRP are described in the VRP Act at OCGA 12-8-108(1). Select from among the choices in that paragraph for establishing delineation standards for soil and groundwater at this site. Note that if the proposed well survey confirms that the site meets the conditions of Section 12-8-107(g)(2) of the Act, Lafarge may propose an alternate delineation criteria for groundwater that is protective of human health and the environment.
3. Table 2 in the Data Report for May 2013 Groundwater Sampling and Analysis and Table 2 in the Data Report for October 2013 Groundwater Sampling and Analysis both present sampling results for “Constituents of Concern Listed in Consent Order”. Table 3 in both documents presents results for “Detected Compounds – Not Included in Consent Order”. Also, the Corrective Action Effectiveness Report – 2012 refers to the “20 COCs listed in the Consent Order.” Note that COCs are defined in the Act as ...”the specific regulated substances that may contribute to unacceptable exposure at a site.” Therefore, in addition to the COCs listed in the Consent Order, other regulated substances detected at concentrations exceeding RRS are also COCs. Further, carbon tetrachloride, CFC-11, cis-1,2-dichloroethene, cyclohexane, and isopropylbenzene, which appear in Table 3 of one or both of the data reports, and which are all regulated substances, may need to be considered COCs for this site, pending the development of RRS values.

4. The IAVI Report compares measured air concentrations for site constituents of concern to Occupational Safety and Health Administration (OSHA) standards (as requested by EPD). In March 2012, the U.S. Environmental Protection Agency (EPA) released a Vapor Intrusion Screening Level (VISL) calculator. EPD recommends that all vapor intrusion screening be conducted against chemical-specific Target Indoor Air Concentrations derived using the U.S. EPA's VISL calculator. Values derived using the VISL calculator are based on the best available science and the latest toxicity and chemical-specific information values in the US EPA Regional Screening Levels (RSL) tables (see [http://www.epa.gov/reg3hscd/risk/human/rb-concentration\\_table/whatsnew.htm](http://www.epa.gov/reg3hscd/risk/human/rb-concentration_table/whatsnew.htm)). The VISL calculator is updated as new versions of the RSL tables are released. The VISL calculator can be downloaded at: <http://www.epa.gov/oswer/vaporintrusion/guidance.html#Item6>. Please update the IAVI Report by running the VISL calculator and comparing the resulting Target Indoor Air Concentrations to measurements described in the IAVI Report.
5. Further vapor intrusion assessment may be required depending on the outcome of soil and groundwater delineation activities and on the requirements of the final remedial plan for soil and groundwater. For example, a remedial plan that includes shut-down of the current groundwater pump and treat system may require further evaluation of the potential for future vapor intrusion in nearby buildings.
6. In Table 1 of the IAVI Report, the indoor air concentration reported for total xylenes at sample point AS-5 is 2.2 µg/m<sup>3</sup>. According to the laboratory report, the correct value for total xylenes at AS-5 is 3.3 µg/m<sup>3</sup>. Please make that correction in any future versions of the table.
7. The VIRP does not include any information on historical or current soil concentrations. When the excavation referenced in the April 30, 2013 Soil Excavation Work Plan is completed, submit sampling results, including a figure showing historical and current soil concentrations for all impacted, un-excavated areas. Include confirmation samples and investigation samples. Also, show all previous soil excavation areas.
8. In addition to searching the USGS well database and contacting local authorities in attempting to locate nearby domestic wells, conduct a field reconnaissance well survey of the area to identify all public and domestic wells within a distance of 3 miles downgradient of delineated site contamination. A 3-mile search is required to verify that the property meets the conditions of Section 12-8-107(g)(2).
9. In a comment letter dated July 15, 2009, EPD requested that LRM conduct a detailed, site-specific geologic study of the site in order to improve understanding of groundwater flow in bedrock and facilitate the location of wells to delineate trichloroethene in bedrock groundwater. LRM agreed, in a response letter dated September 17, 2009, to provide a geologic study work plan by October 2, 2009. However, no work plan for a geologic

study was ever submitted. LRM must continue with plans to provide the geologic study, or else show why the study is no longer necessary under the approved VIRP.

10. Annually, include in a semi-annual progress report, a table that presents historical groundwater quality data at each well, similar to Table 5 of the Annual Corrective Action Effectiveness Report – 2012. Also, provide a concentration contour map for each constituent of concern (COC) that depicts the areal extent of the groundwater plume exceeding RRS, and trend-graphs for each well showing changes in concentration over time of each COC exceeding RRS, similar to the trend-graphs shown in Appendix C of the Annual Corrective Action Effectiveness Report – 2012. Also, include vertical cross sections that show stratigraphy, elevation of the water table, wells, and contaminant concentrations.
11. EPD noted that the sampling logs for wells MW-4 and MW-17 for the May 12-16, 2013, sampling event show that those wells had not stabilized with respect to pH when the sample was collected. Stability criteria require three consecutive measurements of pH in which that parameter does not vary by more than 0.1 units. Continue purging until stability is achieved before taking the sample (see USEPA Science and Ecosystem Support Division, SESDPROC-301-R3: <http://www.epa.gov/region4/sesd/fbqstp/Groundwater-Sampling.pdf>).
12. EPD noted that the sampling log for well MW-2 for the May 12-16, 2013, sampling event shows that this well had not stabilized with respect to turbidity when the sample was collected. Stability criteria require that turbidity be less than 10 NTUs. This is especially important when the sample is to be analyzed for metals, as is the case for this sample. Continue purging until stability is achieved before taking the sample, in accordance with SESDPROC-301-R3.
13. EPD noted that the sampling log for wells MW-29, MW-30, and MW-32 for the October 7-14, 2013, sampling event shows that drawdown at these wells during purging was excessive for the low flow/low volume method. Use a pump rate that ensures that drawdown is slight and stable when using the low flow/low volume method in accordance with SESDPROC-301-R3.