



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-656-7802

September 15, 2016

VIA E-MAIL AND REGULAR MAIL

Lafarge Road Marking, Inc.
c/o J. C. McCarthy, President
Lafarge N. A., Inc.
13450 Sunrise Valley Dr.
Herndon, VA 20171

Re: 2nd VIRP Semiannual Progress Report, October 30, 2015
3rd VIRP Semiannual Progress Report, May 19, 2016
Former Lafarge Road Marking, Inc., HSI No. 10004
2675 North Martin Street
East Point, Fulton County, Georgia

Dear Mr. McCarthy:

The Georgia Environmental Protection Division (EPD) has reviewed the second and third Voluntary Investigation and Remediation Plan (VIRP) Semi-Annual Progress Reports (Reports) submitted by Lafarge Road Marking, Inc. (LRM) pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD commends LRM for the proactive and substantial remediation efforts being undertaken at the site.

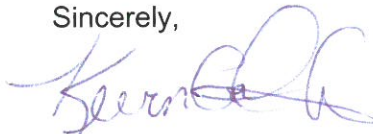
1. EPD does not agree with terminating the operation of the groundwater recovery and treatment system at this time due to the historic and recent detections of trichloroethene (TCE) in groundwater at concentrations exceeding 1% of solubility (>14,720 µg/L) both onsite and offsite at monitoring locations MW-7, MW-32, MW-41, and MW-46, which is a reliable indication of the presence of remnant source material (i.e., DNAPL) below the water table at the site. EPD understands that temporarily turning off the groundwater recovery and treatment system may provide relevant data for evaluating its impact on the stability of the groundwater plume downgradient, but a permanent shutdown of the system at this time diminishes ongoing efforts to address any potential subsurface source material(s). Please note that since converting MW-32 and MW-7 to dual phase extraction (DPE) wells there have been notable decreases in TCE concentrations in these wells. Consequently, EPD requests that rather than terminate operation of the recovery system, consideration should be given to converting MW-41 and MW-44 to DPE wells and integrating them into the recovery system. In addition, EPD requests that as part of future site activities please continue to evaluate the plume dynamics for the purpose of identifying any potential treatment system modifications/enhancements, or replacement corrective measure(s), that may optimize or even expand the treatment of the source material impacts.
2. Taking into account the actions requested in response to the above listed Comment (1), please provide an update on the near-term status and long-term plans regarding the operation of the AS/SVE/DPE system as part of the next scheduled progress report.

3. EPD concurs with the revaluation of the groundwater assessment program and the installation of the additional groundwater monitoring wells proposed within the third semiannual progress report.
4. According to the text, low flow, low volume groundwater sampling was conducted. Per the EPA Region 4 SESD guidance, the end of the tubing or pump intake should be positioned at the midpoint of a well screen and the drawdown should be kept to a minimum. In a review of the sampling logs, it appears that in some wells the pump intake was consistently not placed properly, e.g., MW-32 & 36 – bottom of well screen interval and not the midpoint. In addition, in some wells the drawdown appeared to be excessive, i.e., >0.3-feet. Please review the procedures described in the SESD groundwater sampling operating procedures, currently *SESDPROC-301-R3* (effective March 6, 2013) and follow that protocol in subsequent sampling events.
5. The third report did not contain a copy of the disposal manifest to verify that between September 11, 2015, and February 16, 2016, the system recovered approximately 16,500 pounds of total VOCs. Previous semiannual reports have included a copy of the waste disposal manifest which verified that the waste was disposed of in regards to proper procedures. Please resume including a disposal manifest in future semiannual reports to illustrate compliance with proper disposal procedures.
6. Solid waste management unit three (SWMU #3) was not properly identified in several figures from both Reports. In future Reports please include figures with the correct labeling for SWMU #3.

LRM 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 LRM. However, failure of EPD to respond to a submittal within any timeframe does not relieve LRM from complying with the provisions, purposes, standards, and policies of the Act.

EPD anticipates receipt of the next semi-annual progress report, including groundwater delineation, by November 5, 2016. If you have any questions, please contact Patrick J. Klan at (404) 657-8659.

Sincerely,



Kevin Collins
Unit Coordinator
Response and Remediation Program

C: Adam Sowatska, King & Spalding (via email)
Chris Milller & Greg Sitomer, ARCADIS (via email)

File: 261-0516, Lafarge Road Marking, Inc. – VRP HSI#10004

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