

September 17, 2018

Mr. Stephen Thorn
Environmental Compliance Manager
Chemtrade Logistics
90 East Halsey Road
Parsippany, NJ 07504

Re: Voluntary Remediation Program (VRP) Progress Report #11
General Chemical (Chemtrade) Site, HSI # 10498
East Point, Fulton County

Dear Mr. Thorn:

The Environmental Protection Division (EPD) is in receipt of the July 2018 Semi-Annual Groundwater Monitoring Report No. 20 (VRP Progress Report # 11; hereinafter the Report) for the General Chemical Site in East Point, Fulton County. After completing a review of the Report, EPD has prepared the following comments:

- 1) Neither the Report nor any other correspondence received since EPD's September 6, 2017 letter has addressed all of EPD's comments made in that letter.
- 2) Groundwater sampling should be conducted in accordance with the most recent version of the USEPA Region 4 Science and Ecosystem Support Division Groundwater Sampling operating procedure. The most recent version of this operating procedure is SESDPROC-301-R4, dated April 2017 and is available at: <https://www.epa.gov/quality/procedures-groundwater-sampling-science-and-ecosystem-support-division>. This comment was noted previously in EPD comment letters.

Section 4.2 *Monitoring Well Sampling Procedure* of the Report noted that an older version of the groundwater sampling procedure was used. Also, on the sampling forms in Appendix B of the Report all handwritten text on the sampling forms should be legible.

- 3) On future reports, please ensure all units of measurement on the sampling forms are correct. For example, the recorded temperatures in the Report for SW-07 and EPW-02 are approximately 66°F but are listed in °C.

The above listed comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the VRP Act. Please provide responses to the above listed comments as part of the next scheduled Progress Report submittal, which is due by January 20, 2019.

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Also, please be aware that this Site is now part of the newly-formed VRP Unit, and if you have any questions regarding this matter, you should contact Gordon Terhune at (404) 657-8600.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

c: James Lewis, Chemtrade Logistics (JLewis@ChemtradeLogistics.com)
Brian D. Jacobson, Geosyntec Consultants (BDJacobson@Geosyntec.com)

File: 261-0554 – VRP (HSI # 10498)

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