



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
2 Martin Luther King, Jr. Drive
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September 6, 2017

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

Re: Comments – Semi-Annual VRP Progress
Report #s 8 and 9
General Chemical Site
East Point, Fulton County, HSI # 10498

Dear Mr. Thorn:

The Environmental Protection Division (EPD) is in receipt of the following documents (the “Reports”) for the General Chemical Site], in EastPoint, Fulton County.

- 1) January 2017 Semi-Annual Groundwater Monitoring Report No. 17 (VRP Progress Report # 8), and
- 2) July 2017 Semi-Annual Groundwater Monitoring Report No. 18 (VRP Progress Report # 9)

After completing a review of the Reports, EPD has prepared the following comments:

- 1) EPD encourages Chemtrade Logistics (Chemtrade) to complete the negotiations with the City of East Point and schedule the site related corrective measures (i.e., slip line the storm water drains or perform any necessary repairs to prevent groundwater from entering the storm drain system) as soon as practicable. Additionally, in light of the increasing trend in sulfate concentrations at EPW-01, Chemtrade should consider slip-lining the stormwater conveyance to SW-09 and SW-07AA to protect against further damage to the City of East Point’s concrete stormwater conveyance system from groundwater impacted by Chemtrade’s historical activities.

EPD has issued a second letter, dated September 1, 2017, notifying MGA Holdings LLC that its property may be a potential upgradient source of groundwater and surface water impacts to the Chemtrade site, and that EPD believes a release requiring notification has occurred at that site. However, while EPD acknowledges a potential second source, EPD cautions Chemtrade against delay in implementing a remediation plan that would protect against further damage from impacts caused by Chemtrade.

- 2) Please update the cost estimate for the remaining corrective measures to be completed at the site with an update to the associated financial assurance mechanism, as necessary. Please provide EPD with a status update and any necessary update to the associated financial assurance mechanism.
- 3) While Figures 3-4 and 3-5 illustrate groundwater concentrations and the lateral extent of the area exceeding the Type 4 compliance criteria, the final Compliance Status Report, necessary for the site to be removed from the Hazardous Site Inventory (HSI), must include a complete definition of the

horizontal and vertical extent of such soil contamination. Satisfactory evidence of a complete definition of the horizontal and vertical extent of soil contamination shall consist of an appropriate number of data points at sufficient locations with concentrations that demonstrate compliance with Type 1 or Type 2 risk reduction standards (RRSs) or that reflect background concentrations. Additionally, Figure 3-6 does not include information regarding the in-stream water quality standards (ISWQS) or Type 1/Type 4 RRSs. Please ensure that future VRP Progress Reports include a comparison of site data to the applicable Type 1/4 RRSs/clean-up criteria in figures, tables and narrative format [Rule 391-3-19-.06(3)(b)2.].

- 4) Several figures could be added or improved to support the narrative:
 - a) Figure 3-4 in the July 2017 report uses a purple-tinged line to show the delineation of the sulfate concentration above the Type 4 RRS, which is difficult to see. Please improve the visibility of these lines in future reports by using a different color.
 - b) Plotting the Mann Kendall results on a figure would be supportive of the narrative with regard to the trends being displayed at upgradient, source and downgradient wells and surface water. Please include such a figure.
- 5) Please be aware the EPA recently issued an update to its Field Branches Quality System and Technical Procedures (FBQSTP) Operating Procedure for “Groundwater Sampling”, SESDPROC-301-R4. Future reports should note whether the updated procedures were strictly adhered to, or if any variations occurred, and how such variations may have impacted the sampling are inadequate to document that approved sampling protocols were followed.

In addition, surface water sampling should follow the FBQSTP Operating Procedure for “Surface Water Sampling”, SESDPROC-201-R4. As with the groundwater sampling procedures, Chemtrade should note whether SESDPROC-201-R4 was strictly adhered to, or if any variations occurred, and how such variations may have impacted the sampling.
- 6) The Report lacks Tables of historic groundwater quality data as measured in the field (e.g., DO, pH, temperature, turbidity, conductivity, ORP, elevation data, etc.).

The above listed comment must be addressed to EPD’s satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Please provide a response to the above listed comment as part of the next scheduled Progress Report submittal. If you should have any questions regarding this matter, please call Tom Brodell of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

- c: Stephen Thorn, Chemtrade Logistics <sthorn@chemtradelogistics.com>
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File: HSI # 10498