

# Georgia Department of Natural Resource

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30303

Chris Clark, Commission  
Environmental Protection Division  
F. Allen Barnes, Director  
Land Protection Branch  
Mark Smith, Branch Chief

## Reply To:

Response and Remediation Program  
2 Martin Luther King, Jr. Drive, S.E.  
Suite 1462, East Tower  
Atlanta, Georgia 30334-9000  
Office 404/657-8600 Fax 404-657-0807

October 12, 2010

## VIA E-MAIL AND REGULAR MAIL

# COPY

Selig Enterprises, Inc.  
c/o Mr. S. Kevin Curry  
1100 Spring Street, Suite 550  
Atlanta, Georgia 30309

Re: Supplemental Voluntary Remediation Program Application, May 10, 2010  
Comment Letter  
Spalding Corners Shopping Center, HSI Site No. 10639  
7700 Spalding Drive, Norcross, Fulton County, Georgia  
Tax Parcels 06-0313-LL-009-1 and 06-0313-LL-034-9

Dear Mr. Curry:

The Georgia Environmental Protection Division (EPD) has reviewed the May 10, 2010, Voluntary Remediation Plan (VRP) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has noted the following deficiencies:

1. In Section 3.2.2 of the Application, Selig states that a halo or ring of moderately higher concentrations remain outside the area previously treated by the In-Situ Chemical Oxidation (ISCO), and has continued to move downgradient with the normal groundwater flow. As a result, the plume now extends beyond MW-5S and MW-6S. In addition, Figures 9, 10, and 11 indicate that the regulated substances Tetrachloroethene (PCE), Trichloroethene (TCE) and cis-1,2-Dichloroethene (cis-1,2-DCE) are not horizontally delineated in groundwater beyond the seep. EPD agrees that additional sampling points will be needed to define the downgradient edge of the plume.
2. Section 3.3.3.3 of the report states that no points of groundwater withdrawal are known to be located within one mile of the site, nor in a downgradient direction relative to the site and of the groundwater flow direction. Please note that the site was originally listed on the Hazardous Site Inventory for a drinking water well located within one mile and downgradient of the site. This well, and the potential for future use of groundwater at the site, should still be evaluated as a potential exposure points. If Selig is relying on the assumption that groundwater will not be utilized in order to negate that exposure pathway, then controls are needed to guarantee that assumption. As such, Selig would need to execute covenants restricting such use on the qualifying properties in conformance with O.C.G.A. 44-16-1, et seq., the Georgia Uniform Environmental Covenant Act.
3. Section 3.3.7.2 of the Application states that a schedule for completion of the human health and ecological risk evaluation is presented in Appendix G; however this could not be located within the schedule presented in Appendix G. In order to determine whether immediate corrective action is necessary, please provide the human health and ecological risk evaluation with the first semi-annual report scheduled to be submitted by April 8, 2011.
4. EPD approves the use of ISCO as the corrective action for groundwater but reserves approval of Monitored Natural Attenuation (MNA) until such time that additional data indicates that MNA will bring the site into compliance within 5 years.

5. Although soil remediation has been previously conducted, the soil exposure pathway cannot be eliminated. However, EPD has concurred that soil meets the Type 1 RRS, so no further action is required for soil.
6. The March 15, 2010 letter stated that EPD could not agree that a vapor intrusion evaluation was not required solely on the basis of soil meeting Type 1 and 3 Risk Reduction Standards and did not require the submittal of a vapor intrusion evaluation at that time. After further evaluation of the currently available information, EPD is now requiring that the vapor intrusion pathway be evaluated.
7. Section 2.5.3 of the application states that Peachtree Environmental, Inc. (Peachtree) is electing to use the low flow (minimal drawdown)/ low volume purging techniques. In future sampling events, please record time and water level in addition to the list of parameters on the monitoring well purging and sampling information sheets located in Appendix B.
8. Please note the legend for Figure 11 is incorrect. The legend should note cis-1,2-DCE rather than PCE.
9. EPD could not locate the requested monthly summary of hours invoiced and a description of services provided to the VRP participant as requested in Comment 4 of the March 15, 2010 letter. Section 1.1 of the Application states that this item was not addressed in this report because a majority of the efforts in preparation of this report predated the revised checklist. Please note that Section 4.k of the original checklist and section 6 of the revised checklist require submittal of the same statement and summary of hours invoiced. The summary for all work completed to date should be included with the first semi-annual report.
10. SW-3 contains concentrations of PCE that exceed In-Stream Water Quality Standards. Therefore, surface water sampling must be completed downstream in either the wetlands area or Crooked Creek to determine the extent of the exceedences. Ongoing monitoring requirements will be determined based on the results of the Preliminary Risk Evaluation and fate and transport modeling. In accordance with our October 8, 2010 approval letter, by April 8, 2011 Selig must apply to EPD to include the property that includes SW-3, and any other property, if applicable, as qualifying properties under the Act or notify EPD that the non-qualifying properties are not included under the Act.

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

If you have any questions, please contact Greg Gilmore at (404) 657-8600.

Sincerely,



Mark Smith, Chief  
Land Protection Branch

c: William H. Lucas, III, P.G., Peachtree Environmental, Inc.

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