

Georgia Department of Natural Resources
Environmental Protection Division

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334
Judson H. Turner, Director
(404) 656-4713; Fax. (404) 651-9425

January 16, 2015

VIA EMAIL & REGULAR MAIL

Rich Schoeck, PE, PMP
Division Director of Engineering & Construction
Gwinnett County Department of Water Resources
684 Winder Highway
Lawrenceville, GA 30045

Re: HSI Site Number: 10844
North Berkeley Lake Road Site
Tax Parcel ID #6-267-028
Gwinnett County Fire Station No. 19
3275 North Berkeley Lake Road
Duluth, Gwinnett County, GA

Dear Mr. Schoeck:

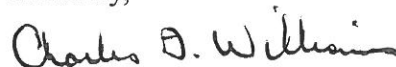
The Georgia Environmental Protection Division (EPD) has received the October 2014 Voluntary Investigation and Remediation Plan (VIRP), that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by CDM Smith on behalf of Gwinnett County Department of Water Resources. After completing its review of the application, EPD has prepared the following comments:

- 1) According to Section 4 of the VIRP, in-vitro bioaccessibility (IVBA) testing has been proposed to determine the potential human uptake of arsenic from the soil onsite. Regarding this IVBA testing, EPD recommends the collection of 20 samples rather than the proposed 10 samples, based on the recommendations included in the referenced U.S. EPA Region 8 December 2012 Final Report (ESTCP Project ER-200916). In addition, it should be noted that according to the information available at the time of this review EPD is not aware of this particular methodology having wide-spread regulatory application at Voluntary Remediation or Hazardous Site Response Act sites in GA. Therefore, EPD will defer formal approval and any further comments regarding this approach until the agency has had the opportunity to review the results of the full analysis.
- 2) According to Section 4 of the VIRP, utilization of an electron microprobe (EMP) analysis has been proposed to determine the form and species of arsenic in soil, which will contribute to a background demonstration for the arsenic in soil. While EPD does not have any formal objections to this particular approach at this time, EPD cannot provide formal approval of this approach as there is not a sufficient amount of supporting documentation to confirm that the methodology associated with the EMP analysis conforms with any federal or state regulatory approved methodologies. Please note that EPD will defer further comments regarding this approach until the agency has had the opportunity to review the results of the full analysis.

- 3) Please provide details associated with the standard operating procedures that are employed for the proposed sample collection and analysis activities that are proposed as part of the EMP and in-vitro bioaccessibility testing.
- 4) Please ensure that the two groundwater monitoring locations that were installed onsite are surveyed, and utilize the neighboring properties' groundwater monitoring well locations and associated groundwater level data to construct a groundwater potentiometric map for the site.
- 5) In support of addressing the delineation requirements included in Section 12-8-108 of the Act, please include a table that indicates the site specific delineation criteria and cleanup standards that will be used at the site as they are applied to each applicable exposure pathway (soils, sediment, groundwater, surface water, etc.).
- 6) Once the RRS have been established for the applicable exposure pathways, please include an evaluation of the overland run-off route from the site and determine the potential for any offsite impacts to surface water/sediment as the result of surface erosion of impacted soils.
- 7) EPD understands that the VIRP Application has indicated that the groundwater exposure pathway is incomplete based on the data provided, but requests that any environmental covenant that is to be placed on the site property as part of the planned corrective measures incorporate a groundwater use restriction to eliminate any future groundwater exposure potential.
- 8) In order to complete the risk reduction standards requirements for the subject site, please ensure that a Type 4 RRS is derived for the protection of groundwater. In addition, please revised Figure 2-3 to include the potentially complete exposure scenario of the construction worker to the migration of subsurface soil to groundwater, and revised Table 301 to include the footnote for the site-specific exposure frequency.

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 Act. EPD may, at its sole discretion, review and comment on documents submitted by Gwinnett County. However, failure of EPD to respond to a submittal within any timeframe does not relieve Gwinnett County from complying with the provisions, purposes, standards, and policies of the Act. Should you have any additional questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

cc: Tom Duffey, CDM Smith
Dan Hansen, Division Director of Fire Services
File: VRP – North Berkeley Lake Road Site #10844, Gwinnett Fire Station