



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

October 5, 2017

VIA U.S. MAIL AND EMAIL

Sechem, Inc.
c/o Giant Cement Holding, Inc.
Rachel Odzer, Environmental Project Manager
654 Judge Street
Harleyville, SC 29448

Subject: EPD Comments
Voluntary Investigation and Remediation Plan dated January 5, 2017
Sechem, Inc., HSI No. 10515
4580 S. Berkeley Lake Road, Norcross, Gwinnett County, Georgia
Tax Parcel No. 6269 007

Dear Ms. Odzer:

The Georgia Environmental Protection Division (EPD) has reviewed the *Voluntary Investigation and Remediation Plan* (VIRP) dated January 5, 2017 that was submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) as an application for entry into the Voluntary Remediation Program (VRP). That application was approved in our letter dated October 5, 2017. EPD has the following comments regarding the VIRP:

1. The following corrections are needed to the Georgia In-Stream Water Quality Standards (GA ISWQS) shown in Table 2:
 - a. The GA ISWQS for 1,2-dichlorobenzene should be 1.3 mg/L, not 13 mg/L.
 - b. The GA ISWQS for 1,1-dichloroethane should be 7.1 mg/L, not 71 mg/L.
 - c. The GA ISWQS for ethylbenzene should be 2.1 mg/L, not 21 mg/L.
2. Please revise Table 4 to specifically show the twelve-month, twenty-four month and thirty-month milestones (as noted on the VRP application form).
3. In the interim since the VRP application was submitted, there appear to have been changes to tax parcel 6269 011 and tax parcel 6269 004. Please verify the changes and update Appendix A of the VIRP application, accordingly. Warranty deeds and tax parcel maps are needed for all qualifying properties.
4. In regards to section 4.6.2 *Environmental Receptors*, the intermittent stream should be reexamined to determine if conditions have changed since the assessment that was presented in the 2000 CSR. Please contact the U.S. Fish and Wildlife Service to verify what fauna or flora may be found in the area and what aquatic life may be found in the intermittent stream.

5. The following exposure pathways should be evaluated:
 - a. The soil and groundwater pathways should be evaluated once delineation is completed.
 - b. The vapor intrusion pathway should be addressed for the on-site building.
 - c. An ecological risk assessment should be conducted to assess impacts to surface water and sediment.
6. The most recent soil data presented from 2013 (Appendix D, Table 3) shows several constituents that exceeded Type 1 and 3 Risk Reduction Standards (RRS). Please describe how soil will be brought into compliance with applicable RRS. Areas exceeding soil delineation standards and RRS should be clearly shown on a map.

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

The first VRP progress report is due by April 5, 2018. If you have any questions, please contact Ms. Susan Kibler at 404-657-7126.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

- c: Rachel Andrews, Earthcon (via email)
Carol Northern, Earthcon (via email)

File: 226-0328 (VRP)