



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

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

January 12, 2018

VIA E-MAIL AND REGULAR MAIL

Georgia Department of Transportation
c/o James Clute, State Facilities Manager
One Georgia Center
600 West Peachtree Street, NW10th Floor
Atlanta, Georgia 30308

Re: First Semiannual Progress Report, January 30, 2017
Georgia Department of Transportation-Gainesville District Office, HSI #10759
2505 Athens Highway, Gainesville, Hall County, Georgia
Tax Parcel 15023-000017

Dear Mr. Clute:

The Georgia Environmental Protection Division (EPD) has reviewed S&ME's January 30, 2017 First Semiannual Progress Report (Progress Report) submitted by the Georgia Department of Transportation (GDOT) for the subject tax parcel (the "Property") pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD offers the following comments, which should be addressed in accordance with the Act:

1. Upon entering Georgia's Voluntary Remediation Program (VRP) on February 18, 2016, the Property was reclassified to Class V and designated as needing corrective action in accordance with §12-8-107 (b) of the Act. Because of the Property's change in class, GDOT was required to file an Affidavit with the Superior Court of Hall County and submit a copy of the recorded Affidavit to EPD within 30 days of recording. EPD has not received a copy of the recorded Affidavit as of the date of this letter. Please submit a copy of the Affidavit or confirm any previous filings in Hall County by no later than February 12, 2018.
2. **Type 1 Groundwater RRS.** The Type 1 Groundwater risk reduction standards (RRS) provided on Table 6 of the Progress Report is acceptable for use at the site except for cis-1,2-dichloroethene and chloroform. The correct Type 1 RRS should be 0.07 mg/L and 0.08 mg/L, respectively. Please ensure that the RRS are revised in future text, tables, and figures that reference the Type 1 groundwater delineation standards.
3. According to the data within the Progress Report, delineation to the established default residential RRS for 1,1-DCE to the north (i.e. MW-9R) is not complete. It is recommended that S&ME clearly identify the delineation objectives and illustrate the property boundary along with the extent of the plume with respect to the target RRS on Figures 6A and 6B in the next Progress Report. Should additional delineation location(s) be necessary to meet the

delineation requirements in accordance with the Act, please include the proposed well location(s) on the noted revised Figure(s) in the next Progress Report. The vertical extent of contamination at MW-3D has been defined at MW-14D.

4. EPD agrees with the recommendation to conduct an additional limited sampling event as proposed in Section 6.0 of the Progress Report; however, please note that additional sampling events may be warranted pending the sampling results. Considering that MW-9 has been destroyed and it was necessary to install the replacement well 260 feet downgradient from the original MW-9 location, please retain MW-12 as one of the wells proposed in Section 6.0 (and Response to Comment #4 in Appendix I) of the Progress Report to be sampled in the next sampling event. Please ensure that the lowest achievable laboratory detection limits for 1,4-dioxane are utilized so that the analytical results can be reported at or below the established RRS for this compound.
5. **Type 4 Groundwater RRS for methylene chloride.** Based on a review of HSI# 10759 files, the Type 4 RRS of 0.019 mg/L for methylene chloride was not approved by EPD. The Type 4 groundwater RRS for methylene chloride is 0.45 mg/L based on the non-carcinogenic RAGS Equation 2 value. Please revise future text, tables, and figures accordingly.
6. Section 2.0 and Appendix I of the Progress Report provide responses to EPD's February 18, 2016 VRP Comment letter. Comments #1, #2, #7, and #8 have been satisfied. EPD has the following comments on the remaining responses:
 - a. **Comment #3.** Based on the results of GDOT's re-evaluation of 1,4-dioxane in soil, EPD continues to concur with the certification that the Property is in compliance with Type 1 RRS for soil.

Type 1 Soil RRS for 1,4-Dioxane. The default Type 1 RRS for 1,4-dioxane is 1.9 mg/kg based on the non-carcinogenic Rags Equation 7 value rather than 0.07 mg/kg. Please revise appropriate text, tables, and figures to reflect the Type 1 RRS of 1.9 mg/kg for 1,4-dioxane in soil in future reports.
 - b. **Comment #4-** GDOT did not provide a milestone schedule in Appendix VII as indicated in the Progress Report. Please include a revised milestone schedule (Gantt style format) in all future VRP progress reports.
 - c. **Comment #5-** The cross section figures provided in Figures 1, 2, and 3 in Exhibit C of the Progress Report provided an adequate depiction of the Property's conceptual site model (CSM); however, the Progress Report does not include a discussion of the CSM and the status of the site specific exposure pathways (i.e. complete or incomplete) as required by Section 5 of the VRP Application Form and Checklist. Please ensure that the CSM is updated in each semiannual report as the corrective action progresses at the Property and in the final compliance status report (CSR).

Additionally, GDOT must confirm water usage for the well pump observed at 2616 Gillsville Highway and the residences without water meters observed along Jack Bryant Circle within ¼-mile of the Property. EPD requested that a thorough well survey be completed by GDOT to a minimum of ½-mile, particularly at nearby downgradient residences during a December 1, 2016 meeting at EPD's offices.

- d. **Comment #6-** EPD concurs with the designation of MW-8 and MW-14D to serve as point of demonstration (POD) wells for the shallow and deep aquifers, respectively; however, GDOT should establish corresponding point of exposures (POEs) in accordance with Sections 12-8-102(11) and 12-8-108(3) of the Act.

Please address the comments listed above in the next VRP semiannual progress report, or as otherwise appropriate, which should be submitted to EPD by July 12, 2018. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at 404/657-0487.

Sincerely,



Kevin Collins
Unit Coordinator
Response and Remediation Program

c: S&ME, Inc., William J. Wagner, Jr., PG. and Peter J. Fleury (Via email)

File: HSI Site 10759, ID No. 256-0079

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