



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

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Atlanta, Georgia 30334
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January 31, 2019

VIA EMAIL & REGULAR MAIL

Southern States, LLC
c/o Pat Taylor, CFO
30 Georgia Avenue
Hampton, Georgia 30028

Re: 7th VRP Progress Report
Southern States Site, HSI 10141
Hampton, Henry County, Georgia

Dear Ms. Taylor:

The Georgia Environmental Protection Division (EPD) has received the October 15, 2018 Voluntary Remediation Program (VRP) Progress Report 7 submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) by Environmental Management Associates, LLC (EMA) on behalf of Southern States, LLC. EPD understands that EMA was not in receipt of the previous comment letter addressing Progress Reports 4-6 prior to submitting Progress Report 7. Therefore, a Response to Comments section in Progress Report 7 was not included in the report. However, based on the discussion during the January 14, 2019 conference call between EPD and EMA, EPD understands that comments will be addressed in Progress Report 8. EPD has the following comments:

1. EPD noted inconsistencies in groundwater elevation data presented in Table 1 and Figure 3 for wells MW-9 and MW-39. Additionally, MW-9 (per Table 1 groundwater elevation), TP-1, and TP-2 lie on the incorrect side of the potentiometric surface contour line labelled "840."
2. Per our conversation on January 14, 2019 and historical groundwater and surface water sampling results at MW-17 and MW-35, and SW-4, respectively, EPD concurs that horizontal delineation of the shallow aquifer is complete to the west. The installation of an additional shallow groundwater monitoring well downgradient of the plume is not necessary.
3. Horizontal delineation of the bedrock aquifer is not complete. EPD recommends the installation of a deep delineation well downgradient of MW-32. The well should be located east of the former beaver pond and along the centerline of the plume.

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. Please address the above comments in the next scheduled Progress Report submittal due April 15, 2019. Should you have questions regarding this matter, please contact Ms. Nicole Vermillion at 404-232-7891.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

c: John O. Schwaller, EMA, LLC (via email)
File: 248-0060 (VRP)