



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

December 2, 2016

David Shelley, CFO
Southern States, LLC
30 Georgia Avenue
Hampton, GA 30028

VIA EMAIL & REGULAR MAIL

Re: October 15, 2016 VRP Progress Report #3
Southern States Site, HSI # 10141
Hampton, Henry County, GA

Mr. Shelley:

The Georgia Environmental Protection Division (EPD) has received and reviewed the October 15, 2016 Voluntary Remediation Program (VRP) Semi-Annual Progress Report #3 (Report). EPD provides the following comments:

1. EPD tentatively concurs with your proposed removal of impacted sediment/soil from the SED-3 and SED-4 locations starting in the fourth quarter 2016. However, please note EPD's earlier comments regarding the need for additional sediment sampling and an ecological risk assessment, both of which may affect the proposed remediation target level and extent of remedial actions. If you choose to proceed, please collect an adequate number of confirmatory samples from both the sidewalls and bottoms of the excavated areas.
2. Please show those three treatment zones (A, B, and C) with some details possible in a figure.
3. Please provide Type 4 Risk Reduction Standard calculations for those regulated substances listed in Table 2 of the Report to EPD for its review and approval.
4. EPD does not concur with your proposed point of exposure well (POE), MW-17, since it is located 1400 feet from the delineated area of the site. According to the Section 12-8-108 of the Act, one option for a POE is a location 1000 feet away from the delineated contaminated area of the site. For this particular site, it should be located in the area between MW-17 and MW-18 and east of the Little Bear Creek. If a monitoring well in this location is not possible, a closer monitoring location may be used.

Please address the above comments in the next Semi-Annual Report due April 15, 2017. Should you have questions regarding this matter, please contact Mr. Yue Han at 404-657-8678.

Sincerely,

A handwritten signature in black ink, appearing to read "David Brownlee", is written over the word "Sincerely,".

David Brownlee
Unit Coordinator
Response and Remediation Program

c: John O. Schwaller, EMA, LLC

File: HSI 10141

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