

Georgia Department of Natural Resources

Reply To:

Response and Remediation Program
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Environmental Protection Division-Land Protection Branch

2 Martin Luther King, Jr. Dr., Suite 1054, Atlanta, Georgia 30334
(404) 656-7802 Fax (404) 651-9425
Judson H. Turner, Director

December 13, 2013

VIA E-MAIL AND REGULAR MAIL

THGC Wrens LLC
c/o Mr. Curtis Michael
Vice President/Assistant General Counsel
400 Plaza Drive, P.O. Box 1515
Secaucus, New Jersey 07096-1515

Re: Voluntary Investigation and Remediation Plan and Application, dated August 23, 2013
Former Oil Processing Corporation Property, HSI Site No. 10245
Industrial Street, Wrens, Jefferson County, Georgia 30833
Tax Parcel ID: 0085 008

Dear Mr. Michael:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated August 23, 2013 submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). The VIRP was submitted in lieu of a Revised Corrective Action Plan required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced property. EPD is approving your voluntary remediation plan, which specifies corrective action consisting of the following: monitored natural attenuation via semi-annual groundwater monitoring events and reporting, and potential in-situ chemical oxidation (ISCO) treatment of groundwater. After completing a review of the report, EPD has prepared the following comments:

1. Please submit all tax plat information for abutting properties including that owned by the Lamb Lumber Holding Company owns, and identified as Parcel No. 0085 005. This property is shown to be located along Industrial Street in Wrens, Georgia.
2. Since this site was already in the corrective action phase, please submit a detailed plan for the implementation of monitored natural attenuation (MNA) at the site in the next progress report. Please assure that this plan is in accordance with the guidance given in the Technical Protocol for Evaluating Natural Attenuation of Chlorinated Solvents in Ground Water (EPA/600/R-98/128). Please include a list of proposed parameters and the frequencies at which the wells are to be monitored for MNA demonstration.
3. On page 14, it is stated that the Type 3 RRS for cis-1,2-dichloroethene) is 5.0 ug/L. However, this should be 70 ug/L as given by Appendix III of Chapter 391-3-19 of the Rules for Hazardous Site Response.

If you have any questions, please contact Mr. Fred Rowe at (404) 657-8600.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: John P. Martiniere, P.E.

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