

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334

Reply To:

Response and Remediation Program
2 Martin Luther King, Jr. Drive, S.E.
Suite 1462, East Tower
Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

Chris Clark, Commissioner
Environmental Protection Division
F. Allen Barnes, Director
Land Protection Branch
Mark Smith, Branch Chief

June 4, 2010

FILE COPY

VIA E-MAIL AND REGULAR MAIL

Trinity Industries, Inc.
c/o Mr. Richard T. Barrett
2525 Stemmons Freeway
Dallas, Texas 75207

Re: Voluntary Remediation Plan and Application, April 22, 2010
Notice of Deficiencies
Manchester Tank Property, HSI Site No. 10765
811 West Avenue, Cedartown, Polk County, Georgia
Tax Parcel 024-014

Dear Mr. Barrett:

The Georgia Environmental Protection Division (EPD) has reviewed the April 22, 2010, Voluntary Remediation Plan (VRP) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has noted the following deficiencies:

1. Please note that comments 3, 4, and 5 from the February 26, 2010 comment letter still apply and should be addressed in future submittals regarding the corrective action at the site.
2. The VRP cover letter states that due to other Hazardous Sites Response Act (HSRA) sites with similar constituents of concern in groundwater near the former Manchester Tank facility, collecting and analyzing a water sample from the Zartic water well will not provide definitive proof that regulated substances detected in the water sample, if any, migrated from the Manchester Tank property. Trinity also states that two additional bedrock wells will be installed between the Zartic well and well MW-7D. Although EPD concurs with the installation of two additional wells, EPD is concerned that the Zartic well may be impacted by contaminants migrating from the deep zone aquifer. Therefore, due to the nature of the bedrock as described in section 2.0 of the July 24, 2009 Corrective Action Plan and the concentrations detected in the deep zone aquifer that are indicative of DNAPL conditions, please sample the Zartic well as previously requested in comment 5 of the April 20, 2009 letter and comment 1 of the February 26, 2010 letter.
3. Please note that investigations to date regarding the Rome Plow property (HSI # 10868) indicate that contamination detected in monitoring wells located on the Rome Plow property has migrated from the Manchester Tank Property and has potentially expanded beyond the Rome Plow facility to the nearby residential area to the east. Copies of the Prospective Purchaser Corrective Action Plan and Supplement, dated February and March 2010, are attached for your reference.
4. Known contamination above site delineation criteria is located on the former Rome Plow property owned by Missouri Machine and Plow, LLC and it is likely that contamination above site delineation criteria is located on property previously occupied by the Zartic facility. In accordance with our June 4, 2010 approval letter, by December 1, 2010 Trinity must sample the Zartic well and apply to EPD to include the Rome Plow property and the Zartic property, if applicable, as qualifying properties under the Act or notify EPD that the non-qualifying properties are not included under the Act

5. Section 2.8 of the preliminary remediation plan indicates that current and expected future use of the site and immediately surrounding properties is industrial; therefore, current and future human receptors at the site are commercial and construction workers. Trinity then states that current and future onsite residential receptors will not be considered due to the absence of a viable exposure pathway. EPD does not concur that these are the only environmental receptors for the release at the qualifying and non-qualifying properties. An exposure assessment that is consistent with US EPA's *Guidance for Exposure Assessment* (57FR104: 20888-22938; May 29, 1992) will be required. Several exposure pathways on the qualifying and non-qualifying properties cannot currently be eliminated from consideration until: 1) contaminant delineation, 2) vapor intrusion modeling, if necessary and 3) groundwater usage and surface water survey 1000 feet from the edge of the plume have been completed.
6. Section 3.2.2 of the report states that subsequent to completing the pilot test, a report describing the pilot test and the results will be submitted to Georgia EPD with recommendations. Please note that all information regarding results of the investigations or corrective action should be submitted to EPD according to the schedule as provided in the VRP Application approval letter dated June 4, 2010. Trinity should proceed with the recommendations described in the report or other actions necessary to remain in compliance with the Act. EPD anticipates the first semiannual report by December 1, 2010.
7. Based on Figures 5 – 8, EPD has determined that soil exceeds established background concentrations or default Type 1 residential Cleanup Standards for certain metals. Continued delineation will be required for these contaminants. Trinity has the option to reevaluate background concentrations based on other HSI sites in the area with approved background concentrations for metals in soil.
8. Please provide isoconcentration maps that indicate the extent of all regulated substances detected above the selected delineation criteria in soil and/or groundwater at the qualifying property and non-qualifying properties.

Trinity must address these comments 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 Trinity. However, failure of EPD to respond to a submittal within any timeframe does not relieve Trinity from complying with the provisions, purposes, standards and policies of the Act.

If you have any questions, please contact Greg Gilmore at (404) 657-8600.

Sincerely,



Mark Smith, Chief
Land Protection Branch

c: Greg D. Hall, P.G., Bullock Environmental, LLC

Encl: Prospective Purchaser Corrective Action Plan and Supplement, HSI No. 10868

File: HSI 10765

S:\DRIVE\GGILMORE\SITES\HSI SITES\10765 - Manchester Tank Company\20100527 - vrp application comments letter.doc