



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

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November 21, 2018

AMC Whitfield Holdings, LLC
c/o Ms. Maria Callas
1141 Crest Valley Drive
Atlanta, GA 30327

Subject: VRP Submittal Extension Request
Tenth Voluntary Investigation and Remediation Plan (VIRP) Progress Report
AMC International, Inc. (HSI 10405)
310 Brookhollow Industrial Boulevard, Dalton, Georgia

Dear Ms. Callas:

The Georgia Environmental Protection Division (EPD) has reviewed the Extension Request and Tenth VIRP Progress Report dated August 22, 2018 for the 310 Brookhollow Industrial Boulevard, Dalton, Georgia property (the Property). EPD has the following comments:

1. **Milestone Schedule:** According to the original project milestone schedule, a Compliance Status Report (CSR) would be submitted on or before August 12, 2018. In lieu of a CSR, EPD received the VRP Submittal Extension Request, dated August 9, 2018, for the Tenth Voluntary Investigation and Remediation Progress Report (Tenth PR). The Tenth PR was submitted within the timeframe outlined in the Extension Request. However, the Tenth PR does not include a revised project milestone schedule that includes a revised dates for submission of the final CSR. The revised milestone schedule should be submitted in the next progress report.
2. **Soil Excavations:**
 - a. Several excavation side-wall and floor soil samples exceeded applicable RRS. Additional soil samples should be collected to confirm the limits of soils exceeding clean-up criteria.
 - b. The original VIRP indicated that it was AMC's intent to remediate soils to comply with the higher of Type 3 or 4 RRS. In future reports, please clarify how compliance will be demonstrated where soils having elevated PCE concentrations, in excess of Type 3 and Type 4 RRS, were left in place (e.g., HA-68, excavation side-wall samples, excavation floor samples, etc.).
3. **Groundwater and Surface Water Results:**
 - a. Following the completion of corrective action activities, EPD recommends that synoptic groundwater and surface water sampling be performed at all monitoring locations. Please note that wells used for corrective action (e.g., DRW-1, DRW-3, etc.) cannot be used to certify compliance.

- b. DMW-15 and DMW-14D should be included in all future corrective action monitoring events.
4. **Delineation north of the property towards MW-23 is incomplete:** Historically, technical challenges associated with terrain, and the presence of groundwater only in bedrock, have limited lateral delineation north of MW-23. On November 9, 2018, EPD visited the facility to evaluate future surface water sampling locations. During the site-walk, areas north of the MW-23 appeared accessible with a drilling rig. As such, technical impracticability does not appear to be appropriate in this scenario. Delineation activities must be completed to the delineation criteria provided under the VRP Act.

We look forward to the receipt of your next VRP submittal on or before February 8, 2019. If you have any questions, please contact Michael Smilley at (404) 463-0530.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

c: Katie Ross – WENCK Associates Inc. (via email)

File: 255-0086, VRP