



Richard E. Dunn, Director

Land Protection Branch

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404-657-8600

July 24, 2018

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

Subject: Ninth VIRP Progress Report dated February 2, 2013
AMC International, Inc. (HSI 10405)
310 Brookhollow Industrial Boulevard, Dalton, Georgia

Dear Ms. Callas:

The Georgia Environmental Protection Division (EPD) has reviewed the Ninth VIRP Progress Report dated February 2, 2018 for the 310 Brookhollow Industrial Boulevard, Dalton, Georgia property (the Property). According to the current project milestone schedule, a Compliance Status Report (CSR) will be submitted on or before August 12, 2018. The CSR will need to include information to address several unaddressed historical comments from previous EPD letters in order to demonstrate compliance with the provisions, purposes, standards, and policies of the VRP Act. Unaddressed historical issues include:

1. **Delineation northwest of the Dobbs Area is incomplete.** EPD has routinely requested the collection of additional monitoring data northwest of the Property beyond OBG-W1 and DMW-7/DMW-1 to complete delineation of the 1,1,1-TCA and 1,1-DCE plumes. Delineation activities must be completed to the delineation criteria provided under the VRP Act.
2. **Delineation north of the property towards MW-23 is incomplete.** While EPD acknowledges the technical challenges associated with plume delineation north of the Property due to accessibility, terrain, and the presence of groundwater only in bedrock, the lateral extent of impact north of the Property is unknown. Delineation activities must be completed to the delineation criteria provided under the VRP Act.
3. **An ecological assessment is required as part of the CSR.** An ecological habitat assessment has not been performed to assess potential ecological receptors in the stream on the Property. Please ensure that the final VRP CSR includes an ecological risk assessment for the stream.

We look forward to the receipt of your next VRP submittal on or before August 12, 2018. To guide the future VRP Submittals, EPD has the following comments:

4. EPD understands that corrective action activities (soil excavations and groundwater injections) were recently performed and that an assessment of the corrective action effectiveness may require several rounds of groundwater and surface water monitoring. All excavation data, including sidewall and floor samples, should be provided in a future VRP

submittal. Also, please clarify how compliance will be demonstrated where soils having elevated PCE concentrations were left in place (e.g., HA-68).

5. Historical groundwater data is included in the Ninth VIRP Progress Report and featured on the corresponding isoconcentration maps. While the information was useful for justifying the remedial actions, please label data collected outside of the range corresponding to the progress reporting period as historical. Each progress report should highlight information obtained during the previous 6-month period.

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