

## **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

January 9, 2018

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

Subject: Seventh VRP Progress Report – March 16, 2017

Eighth VRP Progress Report – September 26, 2017

AMC International Site, HSI No. 10405 310 Brookhollow Industrial Boulevard Dalton, Whitfield County, Georgia

## Dear Ms. Callas:

The Georgia Environmental Protection Division (EPD) has reviewed the Seventh VRP Progress Report dated March 16, 2017 and the Eighth VRP Progress Report dated September 26, 2017. EPD has the following comments that should be addressed in accordance with the Voluntary Remediation Program Act (the Act) in subsequent reporting:

- 1. EPD acknowledges the results of sampling for MNA parameters in the Dobbs area, and EPD concurs with the plan for continued MNA monitoring during the next sampling period.
- 2. EPD acknowledges the results of the ISCO injection event conducted in February and March 2016 and subsequent monthly performance monitoring from the specified locations. Depending on the trends of COC concentrations in groundwater, additional injection events or other measures may be needed.
- 3. EPD acknowledges the soil borings results reported in the 6<sup>th</sup> progress report and concurs with the plans to evaluate a potential soil source in the area of borings B-3, B-4, B-5, and B-6 (collected January 2016).
- 4. EPD concurs with the continued monitoring of the surface water sampling points. In future sampling events please collect water level measurements (or channel depth from water surface) from the sample locations. These measurements will help to correlate VOC concentrations in the stream with trends in stream water and groundwater levels. Please continue to gather additional data to determine the total potential for all impacts to migrate and discharge to the established point of exposure (POE), including determining vertical

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EPD anticipates that the Ninth VRP Progress Report no later than February 23, 2018 and a Compliance Status Report, including certifications on or before August 12, 2018, per the schedule provided in the VRP Application Approval Letter dated August 8, 2013. If you have any questions regarding this matter, please contact David DuBose of the Response and Remediation Program at 404-657-8686.

Sincerely,

Kevin Collins Unit Coordinator

Response and Remediation Program

c: Katie Ross – WENCK Associates, Inc. (via e-mail)

File: HSI# 10405

File: C063, 255-0086, VRP

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