

Georgia Department of Natural Resources

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

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

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

October 3, 2011

CEA, LLC
c/o W. Craig Baker
633 Chestnut Street, Suite 1640
Chattanooga, Tennessee 37450

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

COPY

Re: EPD Comment Letter
Revised Voluntary Remediation Program Application dated May 27, 2011
Capitol USA – Dalton Adhesives, HSI Site No. 10795
300 Cross Plains Boulevard, Dalton, Georgia; Whitfield County
Tax Parcel ID Nos. 13-099-08-000 and 13-099-09-000

Dear Mr. Baker:

The Georgia Environmental Protection Division (EPD) has reviewed the May 27, 2011, revised Voluntary Investigation and Remediation Plan (VIRP) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has noted the following concerns that need to be addressed:

- 1) EPD does not use soil saturation (*C_{sat}*) concentrations of chemicals to identify source material. As stated in Section 391-3-19.02(2)(y) of the Georgia Rules for Hazardous Site Response:

Source material means any material that includes or contains regulated substances that act or may likely act as a reservoir for migration of regulated substances to groundwater, soil, surface water, or air, or acts as a source for direct exposure.

EPD remains concerned that previous EHC applications on site may still be affecting the groundwater system, possibly rendering BioChlor predictions inaccurate at the point of demonstration (MW-16). Furthermore, should paved areas on site someday be replaced by native soil, the potential for subsurface leaching of contaminants into groundwater could increase. Source materials must be remediated on site using a more stringent standard than *C_{sat}* concentrations. Use of a peer-reviewed and/or EPA-approved leaching model to identify source material, such as the partitioning equation from the EPA Soil Screening Guidance, would be preferable.

Risk Reduction Standards

- 2) Regarding the proposed Type 1 risk reduction standards (RRSs) for soil and groundwater, our comments are as follows:
 - a. The Type 1 soil RRS and the associated notification concentration (NC) value for cyclohexane in soil, as listed in Table 5, Appendix E of the revised VRP application, are incorrect. The correct NC value is 20 milligrams per kilogram (mg/kg). Because this value is less than the values calculated using RAGS equations 6 and 7, the Type 1 soil RRS for cyclohexane is 20 mg/kg.

- b. The Type 1 soil and groundwater RRSs for cis-1,2-dichloroethene (DCE) are incorrect, as listed in Tables 5 and 6 of Appendix E of the revised VRP application. Please note that the Rules were amended in December 2009 and included additions and/or corrections to Appendix I and Appendix III, Table 1 in the Rules. Accordingly, the Type 1 soil RRS for cis-1,2-DCE on Table 5 should be 7 mg/kg; the Type 1 groundwater RRS for cis-1,2-DCE on Table 6 should be 0.07 milligrams per liter (mg/L).
- c. The remaining Type 1 RRS values for groundwater and soil on Tables 5 and 6 in Appendix E of the revised VRP application are acceptable to EPD. Should additional constituents of concern be detected on site or if certification to a different RRS type is desired, the proposed RRS values and associated calculations should be submitted to EPD for review within a semiannual report.

The above comments must be addressed 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 CEA, LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve CEA, LLC from complying with the provisions, purposes, standards, and policies of the Act.

Should you have any questions or concerns regarding this matter, please contact Allan Nix of the Response and Remediation Program at (404) 657-3935.

Sincerely,



Alexandra Y. Cleary
Program Manager
Response and Remediation Program

File: HSI No. 10795

c: Roy Barrett, Barrett Properties LLC
Kirk Kessler, EPS