



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

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**Land Protection Branch**

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Atlanta, Georgia 30334  
404-657-8600

August 1, 2017

**VIA E-MAIL AND REGULAR MAIL**

OmniSource Athens Division, LLC  
c/o Brian Winters  
7575 West Jefferson Boulevard  
Fort Wayne, Indiana 46806

Commercial Metals Company  
c/o Joseph Williams  
310 New State Road  
Cayce, SC 29033

Re: 4<sup>th</sup> Semiannual Progress Report, July 29, 2016  
5<sup>th</sup> Semiannual Progress Report, February 27, 2017  
The Loef Company Property, HSI Site No. 10376  
590 Old Hull Road, Athens, Clark County, Georgia  
Tax Parcels 221 00C, 221 001, and 162 037, VRP #802705980

Dear Messrs. Winter and Williams:

The Georgia Environmental Protection Division (EPD) has reviewed the above referenced July 29, 2016 4<sup>th</sup> Semiannual Progress Report and the February 27, 2017 5<sup>th</sup> Semiannual Progress Report (Progress Reports) that were submitted by APEX Companies, LLC (APEX) on behalf of OmniSource Athens Division, LLC (OmniSource) for the above referenced tax parcels (the "Property") pursuant to the Georgia Voluntary Remediation Program Act (the Act). The Reports describe the activities conducted by OmniSource in response to EPD's March 9, 2016 response letter and to continue implementing the November 2011 Voluntary Investigation and Remediation Plan (VIRP) that was approved on May 3, 2012.

According to the 5<sup>th</sup> Progress Report, OmniSource entered into an Asset Purchase Agreement with Owen Industrial Products, Inc. [DBA Commercial Metals Company (CMC)] for sale of the Property. During an April 12, 2017 meeting between CMC and EPD, CMC confirmed that the purchase of the property closed on March, 6, 2017 and stated that they plan to submit an application to retain the Property in the Voluntary Remediation Program (VRP).

After completing a review of the above referenced Progress Reports, and based on the discussions held during the April 2017 meeting, EPD has the following comments:

1. The Property was accepted into the VRP in a letter dated May 3, 2012, which required the submittal of a final VRP compliance status report (CSR) by April 30, 2017. As that date has passed, CMC may submit a request for an extension of time to 1) complete corrective actions at the Property (and any associated impacted property) and 2) submit a final CSR with a certification of compliance with applicable risk reduction standards (RRS). The request for an extension of time should be submitted in the next semiannual progress report.
2. Section 5.2 of the 4<sup>th</sup> Progress Report provided recommendations for future VRP Activities including conducting one additional semiannual sampling of the existing monitoring well network, minus MW-6, that will incorporate the following: EPA Method 8260B analysis to

confirm plume stability prior to site closeout via the execution/ filing of a UEC, sampling a subset of monitoring wells for bio-geochemical analysis, plume stability reassessment using an updated Mann Kendall statistical analysis, etc. However, with the pending sale of the property in November 2016, no recommendations for future VRP activities were provided in the 5<sup>th</sup> Progress Report despite the detection of volatile organic compounds (VOCs) above Type 1 RRS at MW-4A and MW-10 near the eastern property boundary in November 2016. As discussed in the April 12, 2017 meeting, amended recommendations for continuing VRP corrective action activities for the Property, including additional monitoring and the development of institutional controls, should be submitted in the next progress report with an accompanying revised milestone schedule of VRP activities.

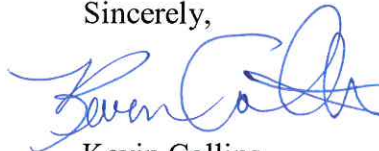
3. Section 2.2 of the 4<sup>th</sup> Progress Report and Section 3.1 of the 5<sup>th</sup> Progress Report provide a discussion of groundwater elevations and flow rates. Please note that for any pertinent hydrogeologic data and calculations (seepage velocity, hydraulic conductivity, hydraulic gradient, etc.) that are presented in progress reports, a representative example of the calculations used to generate these results should be provided. Please provide the supporting calculations in the next progress report. The 4<sup>th</sup> and 5<sup>th</sup> Progress Reports also mention that MW-1 was repaired on May 15, 2015 and converted from stick-up well to a flush-mount well, which lowered the casing elevation by 3-feet. Please ensure that the change in top of casing elevation is cited in future tables and figures, as appropriate.
4. Based on the data provided in the 4<sup>th</sup> and 5<sup>th</sup> Progress Reports, EPD concurs that the VOC groundwater plume generally appears to be stable and/or decreasing with the exception of the eastern property boundary. EPD will defer further evaluation of the status of the plume pending the completion of the additional investigations at POD well MW-4A and MW-10.
5. Based on EPD's review of the BIOCHLOR Model discussion and update in Section 3.3 of the 4<sup>th</sup> Progress Report, no further BIOCHLOR model information will be required at this time.
6. Point of demonstration monitoring for groundwater was selected as the Property's VRP remediation criteria pursuant to Section 12-8-108-4 of the Act. EPD's Comment #4 of the March 9, 2016 response letter requested the identification of the point of exposure (POE) for MW-4A and MW-9A, which were previously identified as the point of demonstration (POD) wells. The 4<sup>th</sup> and 5<sup>th</sup> Progress Reports identified the established point of exposure (POE) for both wells as a hypothetical location that is 1,000-feet down gradient of the boundary of the plume. Based on the detection of VOCs above Type 1 delineation standards at POD well MW-4A and MW-10, additional investigation and monitoring appear to be warranted down gradient of the eastern property boundary. Various options for addressing potential migration of plume were discussed during the April 12, 2017 meeting with EPD. Please submit a remediation plan to complete delineation along the eastern property boundary, which should achieve the following:
  - a. Demonstrate groundwater delineation to Type 1 RRS to the extent practicable.
  - b. Identify any potentially complete exposure pathways that may be impacted by the VOC plume beyond the Property boundary. Any existing remedial measures and/ or institutional controls should be modified as necessary.
7. Based on EPD's review of the Groundwater Exposure Pathway as it pertains to impacting the Surface Water Exposure Pathway, the assertion that the pathway is incomplete because

subsurface storm water piping is positioned at elevations above the water table in the areas containing VOCs does not provide convincing evidence in support of an incomplete Surface Water Exposure Pathway. Conversely, EPD recommends emphasizing that the nearest surface water body, East Fork Trail Creek, currently lies more than 1,000-feet from the known extent of the VOC plume to adequately support the determination that the surface water pathway is incomplete. Depending upon the results of the additional groundwater investigations, reassessment of the surface water exposure pathway may be warranted.

8. The 4<sup>th</sup> and 5<sup>th</sup> Progress Reports conclude that the vapor intrusion (VI) exposure pathway is incomplete and exposure to a VI exposure hazard was unlikely, as there were no buildings or structures that overlay the known groundwater plume boundary on-Property and the nearest occupied downgradient structure is greater than 100-feet from the edge of the VOC plume. EPD requires reevaluation of the VI Exposure Pathway pending further delineation of the downgradient extent of the VOC plume at the eastern property boundary, and potentially off-Property. As discussed in the above referenced meeting with EPD, CMC has the option to address VI mitigation requirements in the Property's uniform environmental covenant (UEC).
9. Former source area monitoring well MW-2A was last sampled on May 20, 2015, prior to its closure. The final sampling results were not posted to Figure 4, *Groundwater Sampling Results*, of the 4<sup>th</sup> and 5<sup>th</sup> Progress Reports. Please post the results to the figure in future reports to document plume conditions prior to the decommissioning of the well.
10. Pursuant to Chapter 391-3-26 of Commercial Environmental Laboratories, the Reports should include a laboratory certification for all sample media that includes the name of the laboratory, name of the accreditor, accreditation ID number, scope of accreditation, and effective expiration dates of accreditation. Please provide the information for the data presented in the subject Report and all future reports in which lab data is submitted.

Please provide responses in 'response to comment' format and address the above listed comments in the next Semiannual Progress Report, which is due by October 2, 2017, or as otherwise directed. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at (404) 657-0487.

Sincerely,



Kevin Collins  
Unit Coordinator  
Response and Remediation Program

- c: Apex Companies, LLC, Kathleen Roush, PG (Via email)  
Arnall Golden Gregory, LLP, John Spinrad (Via email)  
Commercial Metals Company, Alan Gillespie (Via email)

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