

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

June 4, 2014

VIA E-MAIL AND REGULAR MAIL

Apollo Industries, Inc.
c/o Mr. Christopher Hurst
Vice President, EHS
1850 S. Cobb Industrial Blvd.
Smyrna, Georgia 30082

Re: Voluntary Investigation and Remediation Plan and Application, March 4, 2014
Apollo Industries, Inc. Site, HSI No. 10333
1850 S. Cobb Industrial Blvd, Smyrna, Cobb County, Georgia
Tax Parcels: 17-0678-00-040 17-0679-00-130
17-0678-00-050 17-0678-00-030
17-0618-01-240

Dear Mr. Hurst:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) and application dated March 4, 2014, submitted for the above referenced property (the property) pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has determined that the property and tax parcels listed above have documented impacts and are eligible for enrollment into the Georgia Voluntary Remediation Program (VRP). Transmitted herewith, please find a proposed consent order that, when executed, will supersede the existing consent order, Consent Order EPD-HW-1186, under which clean-up of the property has been regulated. Execution of the proposed consent order will approve the VIRP and enroll the property in the VRP.

As part of the VIRP review, EPD also reviewed the August 2013 and December 2013 Semi-Annual Groundwater Monitoring Reports, EPD's comments on the VIRP and the above referenced documents are attached. As specified in the proposed consent order, these comments must be addressed to EPD's satisfaction in future progress reports.

Please sign and date the proposed consent order and return it to this office by July 21, 2014. Upon receipt of the signed consent order, EPD will issue a public notice providing for a thirty (30) day comment period pursuant to Chapter 391-1-3-.01, "Public Participation in Enforcement of Environmental Statutes," prior to execution of the consent order. If EPD does not receive any substantive comments, the order will be executed and the property will be enrolled in the VRP. EPD will forward a copy of the executed consent order to you. If you have questions regarding the

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proposed order or comments, please contact Robin Futch, PG, PMP of the Response and Remediation Program at (404) 657-8686.

Sincerely,


Jeffrey W. Cown, Chief
Land Protection Branch

Encl: Proposed Consent Order
EPD Comments on VIRP and other referenced documents

cc: Keith Ziobron, O'Brien & Gere

File: HSI No. 10333

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ATTACHMENT

EPD Comments on VIRP and other referenced documents

Apollo Industries, Inc., HSI No. 10333
1850 S. Cobb Industrial Blvd, Smyrna, Cobb County, Georgia
June 4, 2014

EPD offers the following comments on the Voluntary Investigation and Remediation Plan (VIRP) dated March 4, 2014, the August 2013 Semi-Annual Groundwater Monitoring Report, and the December 2013 Semi-Annual Groundwater Monitoring Report:

Voluntary Investigation and Remediation Plan (VIRP), March 4, 2014

1. Further investigation needs to be undertaken to fully define the horizontal and vertical extent of the dense non-aqueous phase liquids (DNAPLs) in soil and groundwater in the closed batch room sump area of the facility. EPD understands that there are access limitations and challenges but more creative effort needs to be undertaken to both delineate the DNAPL, with a skid mounted hollow or solid stem auger rig, and to begin remediation, such as expansion of the SVE system, as soon as practicable.
2. Further delineation of the extent of exceedances in soil and groundwater beneath the production building slab should be completed. As shown on Figure 3 of the VIRP, the extent has not been defined to the north, east, or south (see Samples S-1, S-3, S-4, OBG-9). For locations where refusal is encountered with a direct push rig, an attempt should be made using either hollow or solid stem augers or coring to advance these borings to groundwater.
3. EPD does not agree that horizontal delineation has been completed to the northeast in soils or overburden groundwater. A data gap exists to the north of MW-4 and east of the sump. The proposed MIP investigation and well PMW-17 may help define a potential source for the contamination in MW-4. However, additional soil samples need to be collected and an overburden monitoring well installed in the production area east of MW-1 and the closed batch room sump in the vicinity of the DOT water bath line. EPD is available to discuss prospective locations with Apollo and their Consultant.
4. Soil investigation should be conducted around MW-8 to determine if a source exists in this area and/or to verify the contamination is coming from a potential off-site source. This would be an excellent area to conduct limited MIP sampling while the MIP equipment is mobilized to the site.
5. All of the Type 1/3 and Type 4 soil and groundwater risk reduction standards (RRSs) calculated in the VIRP are approved. In future Semi-Annual Progress Reports please update groundwater summary tables with the approved regulatory standards and highlight exceedances on the table and update the text of the reports, as applicable.
6. Vapor Intrusion (VI) Evaluation – The VIRP indicates that VI modeling will be conducted to further evaluate this complete exposure pathway. It should be noted that EPD, in accordance with U.S. EPA Vapor Intrusion Guidance documents, recommends that vapor

intrusion evaluations be based on multiple lines of evidence with the results weighed together to achieve agreement based on all available information.

7. Sections 5.2 and 7 note that Apollo intends to remediate soil and groundwater to meet Type 3/4 RRS, with the possible use of Type 5 controls for impacted soils beneath the production building. The Director has established a requirement that a property must meet the policies and procedures of the Act no later than 60 months from enrollment. EPD encourages Apollo to pursue aggressive treatment of soil and groundwater, but we are concerned that the proposed remedy will not result in groundwater meeting Type 3/4 RRS within the requisite 60 months. However, EPD is willing to accept the application since Apollo may utilize alternate actions in conjunction with the remediation, such as modeling, point of demonstration monitoring and/or institutional controls, to meet the policies and procedures of the Act. If these alternatives are utilized, an Environmental Covenant in conformance with O.C.G.A. 44-16-1, et seq., the "Georgia Uniform Environmental Covenants Act" will be required as part of the corrective actions at the site.
8. Sediment samples should be obtained from the two locations near where surface water samples SW-1 and SW-2 are being collected. In addition, one sediment sample should be collected from the detention pond located west of MW-9 in Tract 6.
9. Section 6.3.3 notes that ecological receptors were not considered due to the industrial nature of the area. However, the surface water at the site does provide viable habitat which must be considered. Based on the assumption that surface water concentrations do not increase and that the requested sediment investigation does not reveal elevated concentrations, EPD concurs that further ecological evaluation is not warranted.
10. A specific section should be added to future conceptual site model narratives which should discuss all known or suspected source areas on-site based on facility processes. For example this section should include a discussion of the suspected source areas for the elevated concentrations at MW-4 and MW-7. In addition, a figure depicting all potential on-site source areas should be presented. At a minimum, this figure may include: the batch mixing area and abandoned subfloor sump, tank farm, catch basin, hazardous waste storage area(s), the can integrity line(s), other process lines, the laboratory, raw product storage warehouse, unloading dock, test batch areas, warehouses, etc.
11. In future progress reports, please update the cross sections with current data for both soils and groundwater. The revised cross sections should be scaled with a greater degree of accuracy, presented on an 11 x 17 format, and should include stratigraphic features and symbols for soil lithology in the legends. Please revise cross section B-B' to run from MW-2 through the closed batch room sump to MW-1 to the former container storage area to MW-3 to DW-1 to MW-6. In the cross section revisions please include all new soil sampling locations and monitoring wells.
12. Known contamination above site delineation criteria exists on the downgradient parcel owned by Cyclone Enterprises, LLC. Within 12 months of acceptance into the Program, Apollo should apply to EPD to include the Cyclone Enterprises, LLC property as a qualifying property under the Act or notify EPD that the non-qualifying property is not included under the Act. In addition to the surface water body, the groundwater ingestion pathway must be

considered, and a point of exposure established at the point where groundwater use is not restricted. Therefore, if impacted groundwater continues to migrate off-property, above cleanup standards, ongoing monitoring or corrective action may be required for the Cyclone Enterprises, LLC property in order to comply with the Voluntary Remediation Program Act (Act).

13. EPD has determined that the following property and tax parcels have documented impacts and are eligible for enrollment into the Georgia Voluntary Remediation Program (VRP): 17-0678-00-040; 17-0679-00-130; 17-0678-00-050; 17-0678-00-030; and 17-0618-01-240. Parcel 17-0619-00-200 is ineligible as a qualifying property per 12-8-105(1) of the VRP Act because no evidence of a release has been presented. Please note that the parcel numbers in the application are incorrectly listed and should be revised.

Figures and Tables (VIRP, March 4, 2014)

14. The site layout figure provided (Figure 2) needs to be augmented in a readable format size with the following information: location of all relevant site features including production areas; the detention pond in parcel 6; delineation of and addresses/ownership for each parcel; and historic and current facilities located upgradient of Apollo that may have used chlorinated solvents. See Figure 4 (Facility Layout) of the April 12, 2013 VIRP application for the site to see the level of detail that should be included.
15. Figure 3 – Soil Analytical Results – This figure needs to be submitted as a C or D size drawing. The figure has too much information for the site making it difficult to read and interpret. It should also include all the sampling locations and results from the 2013 Consolidated Site Assessment/Site Closure report.
16. Sample location OBG-14 needs to be added to Figure 3 and Figure 4.
17. Figures that show sample locations at which no analytical samples were collected should be denoted with a different symbol to clarify that no data is available. This includes OBG locations 1, 3, 4, 6, 8, 10, and 11.
18. Please list applicable In-Stream Water Quality Standards on the Summary of Surface Water Analytical Data table. In future Summary of Groundwater Analytical Data tables please revise the applicable regulatory standards to reflect the Type 3 and/or 4 risk reduction standards (RRS) submitted with the VIRP and approved by EPD.
19. A table of all monitoring well construction details, including date of installation, screen length, etc., should be developed for all new and existing wells on- and off-site and included in each progress report.
20. Units need to be consistent between figures and tables. For example, on the cross sections the groundwater results are shown in milligrams per liter (mg/L) while Figure 7 and Table 2 show the groundwater results in micrograms per liter (ug/L).

2013 Semi-Annual Groundwater Monitoring Reports

21. Figures 6-11 are invalid interpretations of the groundwater data that has been collected from the December 2013 groundwater sampling event. For example, Figure 6 shows an interpretation of the horizontal extent of acetone based on three data points where detections occurred. Isoconcentration contours should be drawn based on actual data as solid lines where data points exist and dashed lines where interpretations are made. The same comment applies to all of the figures illustrating the horizontal extent of specific contaminants in both progress reports. Figures showing isoconcentration contours should be prepared for all constituents with one or more exceedances of the RRS.
22. Section 3.2.1, Groundwater Analytical Trends (August 2013) & Section 3.3.1, Groundwater Analytical Trends (December 2013)
 - a) In both Reports it is stated that the stream would likely create a hydraulic divide that would hinder migration of VOC-impacted groundwater. Please install staff gauges (if not already installed) and provide staff gauge/groundwater monitoring well data and a narrative demonstrating the interaction between groundwater and surface water.
 - b) Trichloroethene: In both Reports it is stated that a decreasing concentration trend is observed for well MW-7. However, a review of the time trend graph depicts fluctuating concentrations over time with no apparent trend for MW-7. Please reconsider this statement going forward.
23. Appendix C, Concentration Trend Graphs – Both Reports: Trend graphs should be revised and show acetone, PCE, TCE, 1,2-DCE, and VC on the same graph for MW-1, MW-3, MW-4, , MW-6, MW-7, MW-8, RW-1, and RW-2. Please ensure the graphs contain scales that are not too large and consequently do not reflect the presence of detections. If necessary allow outliers to plot off the graph similar to the method used for DCE in MW-1.
24. Table 1, Summary of Groundwater Elevation Data – Both Reports: It was noted that there is no top of casing survey data provided for well MW-9, and consequently the groundwater elevation could not be calculated. Please survey this well for elevation when the proposed new wells are installed and tie it into the existing datum for the site.
25. EPD concurs with the removal of MW-2 and MW-5 from the existing groundwater monitoring network.