GEORGIA
DEPARTMENT OF NATURAL RESOURCES
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

March 8, 2017

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

Subject: Fourth VRP Progress Report – November 23, 2016
September 2016 Sampling Results
October 25, 2016 Response to Comments Letter
Apollo Industries, Inc., HSI Site No. 10333
1850 South Cobb Industrial Boulevard, SE
Smyrna, Cobb County, Georgia

Dear Ms. Callas:

The Georgia Environmental Protection Division (EPD) has received the above referenced documents, submitted by EarthCon Consultants, Inc. (EarthCon) for the Apollo Industries, Inc. HSI Site No. 10333. After completing a review of these documents, and a subsequent site visit on February 16, 2017, EPD offers the following comments which should be addressed pursuant to the Voluntary Remediation Program Act (Act).

1) According to the October 2016 Response to Comments, EarthCon continues to indicate that further delineation both vertically and horizontally are not necessary in order to meet the requirements of the Act. While it is not explicitly stated within the Response to Comment, EPD assumes that the information within the Response was provided in support of a technical impracticability demonstration for the site delineation and/or characterization requirements. Section 12-8-102(15) of the VRP Act defines technical impracticability as the inability to fully delineate or remediate contamination based on expenditures disproportionate to the incremental benefit. Please provide additional information to support the technical impracticability demonstration, as EPD does not concur that the current justifications of, the site being located in a highly industrialized area and the proposal of complete discontinuity between the onsite release and downgradient offsite impacts, is sufficient to meet the requirements of the Act. Please note that while the cross-sections display a condition where the concentrations increase with depth, EPD would accept a demonstration of vertical delineation of groundwater impacts to the extent that is influential to the established remedial action objectives and in establishing compliance with the Act.

2) According to Section 12-8-108(8) of the Act, certification of compliance for source material may be addressed by demonstrating that the source material has been removed, decontaminated, or otherwise immobilized in the subsurface, to the extent practicable. In line with the comment above, EPD requests that the source material demonstration for the site property include delineation and characterization of source material to the extent that is

influential to the established remedial action objectives and in establishing compliance with the Act. Illustrating the potential preferential migration pathway of the source material in the subsurface through the development of a bedrock contour map for the source area would be a valuable contribution to this demonstration. In addition, please include any additional soil and groundwater investigation information, either from historic site activities or current site activities not explicitly documented in the above referenced reports, which may provide additional support for this demonstration.

3) In order to certify compliance with and receive a Type 5 area determination for source materials as part of the final remedy, a point of demonstration and exposure must be defined for the site. According to Section 12-8-101(11), "the point of exposure will most likely be established as the hypothetical point of drinking water exposure located at a distance 1,000-feet downgradient from the delineated site contamination under this part." In addition, considering that environmental covenants may be part of the final corrective action and associated compliance certification, additional data may be required to define the extent of the applicable institutional controls for onsite soil and source material impacts and for offsite groundwater impacts.

Apollo must address these comments 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 Apollo. However, failure of EPD to respond to a submittal within any timeframe does not relieve Apollo from complying with the provisions, purposes, standards, and policies of the Act.

EPD anticipates that the 5th VRP Progress Report no later than May 20, 2017. If you have any questions regarding this matter, please contact Robin Futch, PG of the Response and Remediation Program at 404-656-3810.

Sincerely,

Kevin Collins
Unit Coordinator
Response and Remediation Program

c: Carol Northern – EarthCon Consultants, Inc. (via e-mail)
File: C050, 245-0288, HSI # 10333

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