

# **Georgia Department of Natural Resources**

## **Environmental Protection Division-Land Protection Branch**

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

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June 14, 2016

### **VIA E-MAIL AND REGULAR MAIL**

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

Re: Second VIRP Progress Report, December 17, 2015  
Third VIRP Progress Report, May 20, 2016  
Apollo Industries, Inc. Site, HSI No. 10333  
1850 South Cobb Industrial Blvd  
Smyrna, Cobb County, Georgia

Dear Ms. Callas:

The Georgia Environmental Protection Division (EPD) has reviewed the Second Voluntary Investigation and Remediation Plan (VIRP) Progress Report dated December 17, 2015, the September 9, 2015 Response to Comment letter, and the Third VIRP Progress Report dated May 20, 2016. EPD has noted the following concerns that should be addressed in accordance with the Voluntary Remediation Program Act (the Act) and the schedule provided in Consent Order (CO) No. EPD-VRP-008 in subsequent reporting:

1. EPD does not concur that completion of vertical delineation is impracticable. Vertical delineation will be influential in establishing remedial action objectives and in demonstrating compliance with program requirements. Based on the exceedances documented in upgradient well MW-3 in the partially weathered rock and the shallow downgradient wells, MW-15 and MW-6R, EPD recommends that a well cluster be installed between the warehouse and MW-15, with one well set in the overburden and one well set in the partially weathered rock. In addition, please prepare a bedrock contour map so that further relevant information can be developed for completing the conceptual site model (CSM).
2. EPD concurs that there are two (2) distinct plumes, the MW-8 plume and the Apollo/MW-6/6R plume. However, EPD does not concur that the Apollo plume and the MW-6/6R plume are due to unrelated sources and believes further downgradient delineation south of MW-6R should be completed in the partially weathered rock and bedrock. The evidence for the two plumes being related is substantiated by the contaminants detected and their ratios as well as their similarity to the contaminants detected in upgradient wells MW-1 and MW-3. In addition, MW-15 is screened 12-feet higher than the screen in MW-6R and as such cannot be used to demonstrate the plumes are unrelated.
3. EPD acknowledges the sampling that was conducted in SB-6 and SB-7 but believes these sample locations are too far from the manufacturing/production area and too deep. Since SB-1 and SB-3 exceeded both delineation criteria and cleanup standards in the samples collected, an attempt should be made to obtain shallow samples, with a small Bobcat type DPT rig or by hand auger, adjacent to the main manufacturing/production area. These samples should be advanced to depths comparable to the soil sampling locations inside the production area. In addition to the soil sampling, one monitoring well should be installed in the partially weathered rock near the southeastern corner of the

production building to demonstrate there is not another source area contributing to the contamination detected in MW-4.

4. EPD does not agree with the permanent deactivation of the Soil Vapor Extraction (SVE) system. The concentrations of contaminants in soil in the footprint of the manufacturing building are elevated sufficiently to suggest free product. For example, in the closed batch sump area, acetone, tetrachloroethene and trichloroethene concentrations have been detected in soil at concentrations exceeding 1,000 milligrams per kilogram (mg/kg). EPD agrees that soils covered by the concrete floor of the manufacturing building have not been subjected to leaching from rainfall infiltration but the elevated concentrations of VOCs in groundwater downgradient indicate that VOCs have migrated downward through capillary action. Temporarily turning off the SVE system may provide relevant data for evaluating its impact on groundwater concentrations downgradient. However, based on this evaluation, rejuvenation, optimization and expansion of this system will likely be required inside the production area.
5. The vertical cross-sections presented in Figures 6 and 7 do not show individual contaminant concentrations superimposed on the stratigraphic features, as required in the VIRP application requirements for illustrating the conceptual site model. Please update these cross sections accordingly in future submittals. In addition, in future progress reports please post groundwater sampling results for MW-6R, MW-7, MW-8, and MW-15 to relevant figures, and add DW-1 to all trend graphs generated for the site.
6. Please note that EPD does not plan to review the draft Uniform Environmental Covenant (UEC) until the groundwater modeling results are submitted in the event that additional controls and/or monitoring is required.

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 4th VIRP Progress Report will be submitted no later than November 20, 2016. If you have any questions regarding this matter, please contact Robin Futch, PG of the Response and Remediation Program at 404-657-8686.

Sincerely,



Jason Metzger  
Program Manager  
Response and Remediation Program

c: Kristen L. Ritter Rivera – EarthCon Consultants, Inc. (via e-mail).

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