



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

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**Land Protection Branch**

2 Martin Luther King, Jr. Drive  
Suite 1054, East Tower  
Atlanta, Georgia 30334  
404-657-8600

June 29, 2017

PCS Administration (USA), Inc.  
c/o Ross M. Smith, Director-Environment  
300 Northwood Road  
Washington, North Carolina 27889

Subject: Voluntary Remediation Program  
Compliance Status Report and 5<sup>th</sup> Semi-Annual Progress Report  
Farmers Favorite Fertilizer Site (HSI 10259)  
315 4<sup>th</sup> Avenue  
Moultrie, Colquitt County, Georgia  
Tax Parcels M033-032, M033-033, M033-034, M034-001, M023-199, M024-214, and  
M024-215

Dear Mr. Smith:

The Georgia Environmental Protection Division (EPD) has reviewed the March 2015 Voluntary Remediation Program (VRP) Compliance Status Report (CSR) and the September 2014 Semi-Annual Progress Report that were submitted on your behalf by Mr. Jeffrey Wagner of AECOM (formerly URS). These reports were submitted to EPD pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100 et seq. EPD has the following comments:

### **Soil Cleanup**

1. Section 391-3-19-.06(3)(b)2 of the Rules for Hazardous Site Response (Rules) requires a CSR to document the complete delineation and compliance of soil contamination. Although earlier reports may have included detailed documentation and discussion of the soil investigation and cleanup, this information was not included in the CSR. The CSR needs to include the following:
  - a. A table summarizing all the soil samples collected during each phase of the investigation, including confirmation samples collected during soil cleanup.
  - b. Site figures indicating the location of all soil sampling data with excavation limits clearly identified. These figures should be submitted on a map with a scale of 1 inch = 200 feet or less as required by Rule 391-3-19-.06(3)(b)2(iii). The electronic copies of such figures should also be verified to have legible text at 100% zoom levels.

- c. Report text should include additional discussion describing the areas that were excavated and explain any variations that were made during the excavation. Specifically, the CSR mentions selective areas outside the main excavation area that were also excavated to address other metal impacts. These areas should be described in the report text and indicated on the site figures. Further discussion is also needed to explain the residual soils along the existing terracotta sewer line in the former sulfuric acid plant area. It is unclear in the report and referenced materials whether these soils are surface soils, subsurface soils, or both. The text and figures should document the nature and extent of any impacted soil remaining in place along the sewer line and demonstrate compliance with RRS.

### **Groundwater**

2. Section 391-3-19-.06(3)(b)3 of the Rules requires the CSR to demonstrate a complete definition of the horizontal and vertical extent of groundwater contamination. Figure B-1 needs to include the final groundwater data from August 2014 instead of simply providing isoconcentration lines. If needed, the revised figures can be split into separate figures for each regulated substance as was presented in the September 2014 Semi-Annual Report.

### **Other Comments**

3. EPD's review of the proposed properties that will require an environmental covenant has found that Tax Parcel M034-003 will also require a covenant for groundwater use restriction. Both Figure 2 and Figure 12 of the VRP CSR show this property to be impacted by the groundwater plume for this site both currently and for the modeled 100 year future.

Please provide a revised CSR to address these comments no later than September 30, 2017. If you have any questions regarding this matter, please contact Bill Williams at 404-232-1502.

Sincerely,



David Hayes  
Unit Coordinator  
Response and Remediation Program

C: Jeff Wagner, AECOM (via email)

File: File # 227-0024 (VRP772900578/HSI#10259)

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