

# Georgia Department of Natural Resources

## Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

May 6, 2014

### VIA E-MAIL AND REGULAR MAIL

**COPY**

Miller Brewing Company  
c/o Stephen Rogers  
3939 West Highland Blvd.  
Milwaukee, WI 53201

Re: Voluntary Investigation and Remediation Plan and Application, December 19, 2013  
Reynolds Metal Company Property, HSI Site No. 10425  
278 Highway 319 South, Moultrie, Colquitt County, Georgia 31768-1299  
(Tax Parcel M052 012)

Dear Mr. Rogers:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan and Application (VIRP) dated December 19, 2013, submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD is providing the following comments:

#### **Report Section 3.0 Conceptual Site Model:**

- 1) In Section 3.4.1, it should be noted that the Uniform Environmental Covenant (UEC) will prohibit the installation of a drinking water well on the property, thus making the human consumption of groundwater on the property an incomplete pathway.

#### **Appendix B Warranty Deed and Tax Plat:**

- 2) Please note that on the Tax Parcel Map, abutting properties should be identified, along with their respective uses.

#### **Appendix D Vapor Intrusion Evaluation:**

- 3) Please note that the ground-water temperature should be changed to an average temperature more reflective of the site ground water. It is acceptable to EPD to use either site-specific data or the United States Environmental Protection Agency's (EPA) Average Temperature of Shallow Ground Water, which can be found online at [www.epa.gov/athens/learn2model/part-two/onsite/ex/jne\\_henrys\\_map.html](http://www.epa.gov/athens/learn2model/part-two/onsite/ex/jne_henrys_map.html).
- 4) Please note that in order to be consistent with guidance in the Georgia Hazardous Site Response Act and the Voluntary Remediation Program Act, the EPD target risk for carcinogens is 1.0E-05.

#### **Appendix E Ground-Water Modeling Evaluation and Summary:**

- 5) While EPD agrees with the general conclusions of the MODFLOW and RT3D flow and transport models, EPD cannot reproduce and confirm the models with the information provided. For guidance on submitting fate and transport models to EPD, please see the following website: [www.gaepd.org/Documents/hsraguideFate.html](http://www.gaepd.org/Documents/hsraguideFate.html). Please note that the model should include a report with sufficient detail and information such that the reviewer would be able to duplicate the model. In addition, the report should include a description of the model, how it approaches the problem,

and its limitations, showing that the model is appropriate for use at the site. Due to the lack of geologic and hydrogeologic complexities at this site, EPD would accept the Biochlor screening model in place of the MODFLOW and RT3D models. The same submittal criteria would apply.

- 6) Please submit trend diagrams that show time versus concentration to support the ground-water models. The time period should include *all* years in which there were sampling events with available ground-water concentration data
- 7) Table 3 should be corrected to include cis-1,2-DCE and vinyl chloride in the table header rows. Additionally, EPD noted the following discrepancies in Table 3: For well ETCMW-113, the 2004 observed value for TCE should be 0.16 and the observed value for cis-1,2-DCE should be 0.066.

#### General Comments:

- 8) Please resubmit Figure 6 and include the monitoring wells and groundwater elevations used to determine the potentiometric surface map.
- 9) Please note in Figure 10, the legend entry for Type 1/3 RRS should be changed from cis-1,2-DCE to vinyl chloride.
- 10) In Figure 5, it is not clear to the reader where the ground-water table is located. Estimation of the ground-water table should be made using wells that are screened in similar elevations.

#### Report Figures:

- 11) There is no date on Figures 7, 8, 9 and 10 to indicate what year the ground-water analytical data was collected. Based on the discussion given in section 3.3, EPD assumes that the concentrations are from the annual ground-water monitoring event that occurred December 2012; however, the concentrations on the figures do not match the data in Table 3, which summarizes the analytical results from the December 2012 event. EPD understands from the O'Brien and Gere that the Figures are intended to represent the December 2012 analytical concentrations less the respective risk reduction standard (RRS). Given this information the following discrepancies were noted:

	Well	December 2012 Concentration from Table 3 (mg/L)	RRS (mg/L)	December Concentration - RRS (mg/L)	Concentration shown on Figure
Figure 7 (PCE)	ETCMW-114	0.024	0.005	0.019	0.015
Figure 8 (TCE)	ETCMW-114	0.450	0.005	0.445	0.495
	ETCMW-115	0.016	0.005	0.011	0.015
Figure 9 (cis-1,2-DCE)	ETCMW-113	0.150	0.07	0.080	0.13
	ETCMW-114	1.300	0.07	1.230	0.93
Figure 10 (VC)	ETMW-117	0.042	0.002	0.040	0.038
	ETMW-118	0.037	0.002	0.035	0.038

The Miller Brewing Company (MBC) 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 documentation submitted by MBC; however, failure of EPD to respond to a submittal within any timeframe does not relieve MBC from complying with the provisions, purposes, standards and policies of the Act.

If you have any questions regarding this matter, please contact Susan R Kibler, P.G., of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Charles D. Williams  
Program Manager  
Response and Remediation Program

c: Sarah Slagle-Garrett, P.E., O'Brien & Gere  
Michael Hall, P.G., O'Brien and Gere

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