

Georgia Department of Natural Resources Environmental Protection Division

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334
Judson H. Turner, Director
(404) 656-4713; Fax. (404) 651-9425

June 4, 2015

VIA EMAIL & REGULAR MAIL

ConAgra Foods, Inc.
c/o Mr. Chris Aupperle
1 ConAgra Drive
Omaha, NE 68102

Re: HSI Site Number: 10509
Swift Meat Processing Plant
Tax Parcel ID #MO22A 005
1189 North Main Street
Moultrie, Colquitt County, GA

Dear Mr. Aupperle:

The Georgia Environmental Protection Division (EPD) has received the February 2015 Voluntary Investigation and Remediation Plan (VIRP), that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by Environmental Planning Specialist, Inc. (EPS) on behalf of Swift Meat Processing Plant. After completing its review of the application, EPD has prepared the following comments:

- 1) Please designate a point of exposure (POE) and an associated point-of-demonstration (POD) well to establish site-specific cleanup standards for groundwater, pursuant to Sections 12-8-108(3) and 12-8-108(4) of The Act. The POD should demonstrate that groundwater concentrations are protective of the downgradient POE. More than one POE and POD may be required if groundwater is eventually determined to flow off site in more than one direction.
- 2) Lead in groundwater has not been delineated east of the locations of MW-9 and MW-15. Pursuant to the updated Georgia DNR *Rules for Hazardous Site Response (Rules)*, Section 391-3-19.06(3)(b)(3), effective October 14, 2014, groundwater contamination should be delineated to the concentrations listed in Table 1, Appendix III of the *Rules*, which are the Type 1 risk reduction standards (RRSs) for those substances. Regarding the VRP regulations, Section 12-8-108(1) of The Act requires that groundwater contamination be delineated to Type 1 RRSs or background. The Type 1 groundwater RRS for lead is 0.015 milligrams per liter. Accordingly:
 - a) Please include MW-28 in the groundwater-monitoring plan.
 - b) Install an additional well east of MW-15, across U.S. Highway 319, and include it in the groundwater-monitoring plan.
- 3) Historical potentiometric data indicates that groundwater-flow direction near the eastern site boundary is unclear. Please prepare a potentiometric-surface map that includes groundwater-elevation data from MW-28 and from a newly-installed well located east of MW-15, across U.S. Highway 319 (see Comment 2[b]).
- 4) EPD notes that the area around MW-13D has been designated as a lead source area in the Bioscreen groundwater-contaminant fate-and-transport model. However, EPD is also concerned about the elevated levels of lead at MW-6, MW-15, and MW-18, all of which exceeded the lead level in

February Voluntary Remediation Program Application

Swift Meat Processing Plant #10509

June 4, 2015

Page 2 of 2

MW-13D during the September 2014 groundwater-sampling event. Designation of different or additional source areas may be necessary if lead concentrations remain high in various wells on site.

- 5) EPD is unconvinced that MW-3 and MW-9 are appropriate downgradient wells for the Bioscreen model. Some ambiguity exists pertaining to groundwater-flow direction at the eastern site boundary. Potentiometric data from MW-28 and from the new well referenced above in Comment 2(b) will possibly clarify direction of groundwater flow. At that time, one or more POD wells should be designated as downgradient receptors for use in Bioscreen model runs.
- 6) To confirm delineation, all horizontal-delineation wells will have to be resampled prior to removal of this site from the HSI and VRP.
- 7) Please indicate the depth to the pump intake on groundwater sampling data sheets. When using the low-flow/low-stress method for groundwater sampling, now designated as a "traditional multi-volume purge," the pump intake should be positioned near the top of the water column and gradually lowered as the water column is drawn down, until the water column stabilizes. When using the low-flow/low-volume method for groundwater sampling, now designated as the "tubing in screened interval method," the pump intake should be positioned at or near the middle of the screened interval, with minimal drawdown during the purging process. Groundwater sampling should be conducted in accordance with USEPA Region 4 groundwater sampling operating procedures (OPs), "Procedure SESDPROC-301-R3, Groundwater Sampling," effective March 6, 2013. The OPs and can be accessed on the Internet at <http://www.epa.gov/region4/sesd/fbqstp>.
- 8) The concentrations of benzene in groundwater are due to a petroleum release from a UST formerly on site. Regulatory oversight regarding the UST release was provided by the Georgia Underground Storage Tank Management Program, which issued a No Further Action letter.
- 9) Please revise Figure 2: Site Map, because the property boundaries are not indicated in the figure. Based upon EPDs records, of this site, the properties listed under HSRA include only the southernmost 2.53-acre property, owned by the City of Moultrie, and the adjoining 2.52-acre property to the north, owned by the Estate of Rennie Tumlin. The JDA property to the west, which included the old boiler house, is not listed under HSRA, but is part of the overall site.

The above listed comments must be addressed 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 Swift Meat Processing Plant. However, failure of EPD to respond to a submittal within any timeframe does not relieve Swift Meat Processing Plant from complying with the provisions, purposes, standards, and policies of the Act. Should you have any additional questions or concerns please contact Ms. Elise Chew of the Response and Remediation Program at (404) 463-7555.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program