

September 26, 2016

ConAgra Foods, Inc.  
c/o Mr. Trevor Foster  
222 W. Merchandise Mart Plaza, Suite 1300  
Chicago, Illinois 60654

**VIA FIRST-CLASS MAIL**

Re: EPD Comments on VRP Semiannual Progress Reports 1 and 2  
Swift Meat Processing Plant, HSI Site Number 10509  
Moultrie, Georgia; Colquitt County

Dear Mr. Foster:

The Georgia Environmental Protection Division (EPD) is in receipt of VRP Semiannual Progress Reports 1 and 2, dated December 8, 2015, and May 29, 2016, respectively, for the former Swift Meat Processing Plant. The reports were submitted to EPD pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100. Our comments are provided below.

- 1) EPD does not necessarily agree that Shallow Zone B has consistently displayed a flow pattern that converges from north and south, transitioning to an eastward flow. Groundwater elevations along the eastern boundary of the Tumlin property have historically been relatively high compared to groundwater elevations within the property interior. EPD agrees that potentiometric data from two proposed delineations wells, east of MW-9 and MW-15, may help clarify direction of groundwater flow.
- 2) The groundwater-sampling logs in Report 1 contain inconsistencies regarding pump-intake placement. If a traditional multi-volume purge is conducted, the pump intake should be initially placed near the top of the water column. The pump intake should be lowered as the water column is drawn down, but should maintain a consistent depth with respect to the top of the water column. A relatively rapid pumping rate may be utilized, but the pumping rate should be reduced if the water column does not stabilize. A rapid pumping rate may also create problems with excess turbidity. If the low-flow purge method is utilized (also known as micro-purging or the tubing-in-screened-interval method), the pump intake should be placed at the approximate midpoint of the well screen, and water-column drawdown should be kept to a minimum (preferably less than 0.1 meter). The pumping rate should be kept relatively slow, usually less than 0.5 liter per minute, to ensure that groundwater is being drawn through the well screen instead of from the top of the water column. The pumping rate and amount of drawdown should be recorded on the groundwater sampling field log at regular intervals. Refer to U.S. EPA Region 4 Science and Ecosystem Support Division (SESD), "Operating Procedure SESDPROC-301-R3."

ConAgra Foods, Inc. 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

EPD Review of VRP Semiannual Progress Reports 1 and 2  
Swift Meat Processing Plant, HSI Site Number 10509  
September 26, 2016  
Page 2 of 2

sole discretion, review and comment on documents submitted by ConAgra Foods, Inc. However, failure of EPD to respond to a submittal within any timeframe does not relieve ConAgra Foods, Inc., from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-3935.

Sincerely,

A handwritten signature in blue ink that reads "Allan C. Nix for".

David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: David Smoak and John Quinn, AMEC/Foster Wheeler (via email)

File: HSI #10509