

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

July 22, 2015

FILE COPY

VIA EMAIL & REGULAR MAIL

Capital City Bank
c/o Mr. Kyle Phelps
304 East Tennessee St.
Tallahassee, Florida 32301

Re: HSI Site Number: 10912
Tax Parcel ID #G050008008, G050008008A
Grantville Mill
41 Industrial Way
Grantville, Coweta County, GA

Dear Mr. Phelps:

The Georgia Environmental Protection Division (EPD) has received the March 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 Specialists, Inc. (EPS) on behalf of Grantville Mill. After completing its review of the application, EPD has prepared the following comments:

- 1) According to the 2015 VRP Application, potential vapor intrusion (VI) pathways will be evaluated during future investigations, comparing any detections to the permissible exposure limits (PELs) established by the Occupational Health and Safety Administration (OSHA). In the event that any chemicals of concern (i.e. PCE) that are identified as part of the VI assessment and are not currently in use at the facility, or are not covered by an active Hazard Communication Program, please note that non-residential screening values should be applied rather than OSHA PELs.
- 2) EPD concurs with the proposed additional groundwater investigation activities that will be conducted in order to meet the groundwater delineation requirements for the site in accordance with Section 12-8-108 of the VRP Act. However, due to the nature of the contaminant released at the site (PCE) and the potential for dense non-aqueous phase liquids (DNAPL) to be present as a result of the release, please ensure that the vertical delineation and associated plume characterization account for the most probable point of DNAPL accumulation beneath the release (i.e., the soil-bedrock interface). Particular care should be taken in identifying any preferential migration pathways that may exist within the overlying soil formations and associated bedrock material(s).
- 3) According to Section 3 and 4 of the 2015 VRP Application, the "point of exposure" (POE) for groundwater was indicated as "to-be-determined." Please note that Section 2.2 of the 2015 VRP Application indicated that two water supply wells are present onsite (GM1 and GM2), which should be classified as the POE for groundwater. Groundwater modeling and the planned additional investigation data may be utilized to establish an appropriate point of demonstration" (POD) for the established groundwater exposure pathway.

- 4) As part of the final VRP CSR, please provide an additional cross section, perpendicular to the groundwater flow direction and update the existing cross section once the additional groundwater and soil investigations are complete.
- 5) Please provide the complete data and documentation associated with the slug test that was performed as supporting documentation for the groundwater flow velocity calculation.
- 6) Please provide a description of the groundwater sampling procedures that were used for the 2010, 2013, and 2014 groundwater sampling events along with all available groundwater sampling logs.
- 7) Please provide the boring logs for the groundwater monitoring wells that were installed in association with the site investigations.
- 8) A figure must be provided illustrating property owner, parcel numbers, and property use information for all abutting properties.
- 9) Please investigate stained soil along the maintenance shop near the piping in order to determine if a release of regulated substances has occurred.

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 Capital City Bank. However, failure of EPD to respond to a submittal within any timeframe does not relieve Capital City Bank 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

cc: Kirk Kessler, EPS
File: VRP – Grantville Mill #10912