GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

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April 18, 2019

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

Subject: Voluntary Remediation Progress Report #7
Grantville Mill Property (HSI #10912)
41 Industrial Way; Grantville, Coweta County

Dear Mr. Phelps:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Progress Report #7 (PR#7) dated January 2019 and received by EPD on January 22, 2019 for the referenced site. EPD notes that the report was submitted by Environmental Planning Specialists, Inc. (EPS) on behalf of Capital City Bank (CCB) and provides a status update regarding project activities. Based on a review of PR#7, EPD has prepared the following comments.

1. Comments related to soil testing/delineation:

    a. It does not appear that complete horizontal delineation has been achieved for Arsenic to delineation criteria in the 1 to 2 foot bgs depth interval east of sample location S-26.

    b. It does not appear that complete horizontal delineation has been achieved for Arsenic to delineation criteria in the 2 to 4 foot bgs depth interval northwest of sample location S-14 and south-southeast of sample location S-29.

    c. It does not appear that vertical delineation of Arsenic to delineation criteria has been achieved.

2. Comments related to groundwater testing/delineation:

    a. An additional monitoring well and/or well(s) with analytical testing supporting that delineation has been achieved will be necessary to the west-northwest of existing wells MW-6 and MW-17.

    b. As part of future reporting related to groundwater assessment/delineation, a potentiometric contour map should be provided to support the inferred VOC plume alignment.

3. Comments related to risk assessment update:

   a. The two Exposure Domains (EDs) for Arsenic ((1) interior machine shop surface soil and (2) exterior soil encompassing the current assessment area) as presented on Figure 6 of the report appear appropriate based on current analytical testing data. However, the EDs may require refinement based on the analytical data findings of additional assessment necessary to complete delineation to applicable criteria as described in Comment 1 above.

   b. With respect to the Arsenic exposure point concentrations (EPCs) for the various depth intervals (i.e., 0-1 foot bgs, 1-2 foot bgs, and 2-4 foot bgs) employing an area averaging approach using ProUCL software, EPD noted the following:

      i. A data set of 25 samples was noted for the 0-1 foot bgs interval as part of the 95%UCL calculation for the Exterior Soil ED. It appears that Interior Soil ED sample results for S-1, S-2, and S-30 were utilized as part of the overall 95%UCL calculation. EPD believes it is appropriate to exclude data from the Interior Soil ED as part of 95%UCL calculation for the Exterior Soil ED. Utilizing a data set of 22 samples, the resulting ProUCL recommended 95%UCL is 25.09 mg/kg as opposed to the value of 28.1 mg/kg as presented in the summary table on Page 8 of the report.

      ii. A data set of 30 samples was noted for the 1-2 foot bgs interval as part of the 95%UCL calculation for the Exterior Soil ED. It appears that Interior Soil ED sample results for S-1 and S-2 were utilized as part of the overall 95%UCL calculation. EPD believes it is appropriate to exclude data from the Interior Soil ED as part of 95%UCL calculation for the Exterior Soil ED. Utilizing a data set of 28 samples, the resulting ProUCL recommended 95%UCL is 30.27 mg/kg as opposed to the value of 28.6 mg/kg as presented in the summary table on Page 8 of the report.

      iii. A data set of 18 samples was noted for the 2-4 foot bgs interval. EPD could not replicate the data point with a concentration of 8.76 mg/kg in the ProUCL data input based on its review of Table 1 of the report. Utilizing a data set of 17 samples, the resulting ProUCL recommended 95%UCL is 13.31 mg/kg as opposed to the value of 13.0 mg/kg as presented in the summary table on Page 8 of the report.

      iv. All ProUCL recommended 95%UCL EPCs for the various depth intervals in the Exterior Soil ED are less than the applicable non-residential RRS of 38 mg/kg. EPD notes that it is stated that the site will remain as commercial or light industrial and that single interior soil sample (i.e., S-1 reported at a concentration of 95.5 mg/kg at 0-1 foot bgs) is proposed to be removed as part of the remedial action and therefore no evaluation of Arsenic exposure is required for the interior machine shop ED.

4. Comments related to planned activities for next reporting period.

    a. EPD notes that planned activities for the next reporting period includes the finalization of the remedial design for in-situ chemical oxidation (ISCO) for the PCE impacted groundwater plume. While finalization of the ISCO remedial design is acceptable, EPD notes that modification of the design may be necessary based on the additional findings of the supplemental assessment activities described in Comment 2 above.

5. Comments related to tables.

    a. EPD notes that the reported concentration of 41.16 mg/kg for the 4 foot bgs depth interval for sample S-8 appears to be erroneous and could not be replicated by EPD. Based on a review of prior data, as well as the ProUCL input data set, it appears that the concentration should be 32.4 mg/kg.

The above comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards, and policies of the Act. EPD anticipates receipt of the 8th VRP Progress Report by July 22, 2019. If you have any questions regarding this matter, please feel free to contact Will Lucas at (404) 656-3851 or via email at william.lucas@dnr.ga.gov.

Sincerely,

David Hayes
Unit Coordinator
Response and Remediation Program

cc: Aaron Williams, EPS <awilliams@envplanning.com>
Kirk Kessler, EPS <kkessler@envplanning.com>

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