GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
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June 29, 2018

Mr. Kyle Phelps
Capital City Bank
1301 Metropolitan Boulevard
Tallahassee, Florida 32308

Re: Semi-Annual VRP Progress Report No. 5
Grantville Mill Property, HSI # 10912
41 Industrial Way
Grantville, Coweta County

Dear Mr. Phelps:

The Environmental Protection Division (EPD) is in receipt of the January 2018 VRP Progress Report (Report) for the Grantville Mill Property, in Grantville, Coweta County. After completing a review of this report, EPD has prepared the following comments:

1) In Section 4.1.1 of the narrative, Capital City Bank (CCB) states soil delineation is complete to the non-residential risk reduction standards (RRS) for the four chemicals of potential concern (COPCs) – arsenic, benzene, lead and Tetrachloroethylene, also known under the systematic name tetrachloroethene (PCE) and to the residential RRS for accessible soils (i.e., shallow soil and soil not covered by structure). EPD disagrees with this statement for the following related reasons:

   a) As communicated previously, delineation of arsenic (As) is not complete to Type 1 or Type 2 RRS or to a concentration reflective of background concentrations to the northwest of S-1 and northwest of S-22. While delineation is not currently complete, EPD has also said it will allow delineation to be accomplished during remediation activities. When EPD made this statement, it envisioned some removal of contaminated soils with confirmation sampling to serve delineation purposes.

   b) It appears from the Final VIRP in Section 4 of the narrative, that area averaging will be used to comply with RRS for arsenic. While area averaging can be used for certifying compliance, it may not be used for delineation. Additional sampling to the northwest of S-1 and northwest of S-22 must be performed for delineation purposes.

2) When there is adequate data coverage, the random exposure scenario is plausible, and the exposure domains/exposure units (EDs/EUs) are well-defined, an area average approach may be appropriate. However, there are limitations to this particular cleanup approach. If area averaging is used, please present and gain EPD's approval of the following elements necessary to successfully derive a valid exposure point concentration (EPC):

   a) A complete characterization of the vertical and horizontal extent of contamination released to the ED;

   b) Definition of the exposure domain (ED) and exposure depth; and

   c) Collection of a statistically valid data set for each proposed ED.

Additionally, if area averaging is the selected method of remediation, please be aware of the following:

a) Consideration should be given to the vertical extent of contamination and distribution of contaminants to avoid calculating biased EPCs. It is also important to understand where the highest contaminant concentrations are present onsite. For example, if a release to soil results in elevated concentrations in the top few inches of soil, an EPC calculated using soil data from the top 2 feet of soil would underestimate the current risk from exposure to surface soil. The EPC calculation, when performed, must be based on an appropriate distribution of the data.

b) For the purpose of determining compliance with a numerical soil cleanup standard, compliance averaging for a contaminant will involve determining the 95% upper confidence limit (UCL) for the mean of the contaminant concentrations in soil. EPD recommends using ProUCL for most statistical evaluations (http://www.epa.gov/land-research/proucl-software). The statistical methods available in the ProUCL program also allow for incorporation of non-detect values in determining EPCs.

c) For practical and cost considerations, EPD recommends a minimum of 10 sample points from a single population, with at least 50% detectable results, to calculate reliable UCL estimates and determine the presence of any outliers occurring within data sets. In cases where a dataset of 10 sample points or more contains less than 50% detected values, the EPC should be based on the maximum detected concentration (MDC) or a nonparametric-based 95% UCL (either Kaplan-Meier (KM) or bootstrapping) EPC should be computed.

d) Note that while the VRP Act specifies surficial soil as being between the surface and a depth of two feet, HSRA and U.S. EPA guidance and other federal and state guidance documents generally classifies a narrower range of soil (0-6 inches and 0-1 foot) as surface soils depending on the type of contaminant. This disparity is in part due to the consideration that a higher level of direct contact exposure to undisturbed soils will most likely be to contaminants in the top couple of inches of soil. It is highly recommended that the data be separated into the 0-1 foot and 1-2 foot intervals in order to demonstrate no discernable disparity between these soil horizons.

3) In Section 4.3, Main Facility Building Actions, CCB proposes two corrective actions to address the potential exposure pathways for future occupants of the building occupied by the former Tropic Formals business, noting that the corrective action option selected will be determined based on the intended future use of the property, and will be enacted prior to occupancy by a future Site owner. Please note that under the VRP Act, a VRP Compliance Status Report (VRP CSR) is prepared after completion of corrective action. The VRP CSR must document that exposure pathways have been addressed, either through active remediation or the use of controls. The use of controls will require that a Uniform Environmental Covenant (UEC) be put into place prior to delisting the Site.

4) In all tables and figures, instead of reporting analytical test results that are below the detection or reporting limit as "ND", please report the actual numerical limit with a less than symbol ("<") preceding the number. This comment is a repeat of a comment made in our October 11, 2016 letter.

5) Laboratory analytical reports for the soil samples taken in May 2016 have not been provided in either the July 2016 Semi-Annual VRP Progress Report No. 2 or any follow-up report since. This comment is a repeat of a comment made in our October 11, 2016 letter.

6) Laboratory analysis sheets have not been provided showing arsenic results for the following samples:

S-13-0.5	S-15-0.5	S-16-0.5	S-16-0.5	S-17-0.5
S-18-0.5	S-20-0.5	S-16-2	S-18-2	S-20-2
S-18-4	S-20-4			

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. Please provide responses to the above listed comments as part of the next scheduled Progress Report submittal. Also, please be aware that this Site has been transferred to the newly-formed VRP Unit, and if you have any questions regarding this matter, you should call David Hayes of the VRP Unit at (404) 657-8600.

Sincerely,

David Brownlee
Unit Coordinator
Response and Remediation Program

c: Kirk Kessler, EPS <kkessler@envplanning.com>

File: HSI # 10912

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