

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, SE, Suite 1462 East, Atlanta, Georgia 30334

Mark Williams, Commissioner
Environmental Protection Division
F. Allen Barnes, Director
Land Protection Branch
Mark Smith, Branch Chief

Reply To:

Response and Remediation Program
2 Martin Luther King, Jr. Drive, S.E.
Suite 1462, East Tower
Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

April 28, 2011

COPY

VIA E-MAIL AND REGULAR MAIL

Drexel Chemical Company
c/o Mr. Mike Shankle, Technical Director
P.O. Box 13327
1700 Channel Avenue
Memphis, Tennessee 38113

RE: Voluntary Investigation and Remediation Plan and Application, February 8, 2011

Comment Letter

Goldkist Chemical Blending Site, HSI Site No. 10228
120 Cape Road, Cordele, Crisp County Georgia
Tax Parcel ID No. 040 031

Dear Mr. Shankle:

The Georgia Environmental Protection Division (EPD) has reviewed the February 8, 2011, Voluntary Investigation and Remediation Plan (VIRP) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has noted the following items, which should be addressed pursuant to the Act:

Ecological Receptors:

1. Soil and sediment contamination identified off-property will continue to be addressed pursuant to the Georgia Hazardous Site Response Act (HSRA) as these areas are not considered part of the qualifying property. On January 28, 2011, EPD issued comments to Drexel Chemical Company (Drexel) on the Screening-Level Ecological Risk Assessment Steps 1-3A (SLERA), dated July 15, 2010. Drexel is required to submit a revised SLERA that addresses comments provided in that comment letter by May 19, 2011. Please note that in order for Drexel to remain a participant in the voluntary remediation program, Drexel must not be in violation of any order, judgment, statute, rule, or regulation subject to the enforcement authority of the Director (OCGA 12-8-106).

Soil:

2. The preliminary action plan states that Drexel intends to excavate four of the eight former surface impoundments. This decision is based on the assertion that "the other four impoundments do not contain sludge and soil data are below RRS values". However, adequate information has not been presented with regards to the location or the thoroughness of characterization of these remaining impoundments. EPD requires that additional data be collected unless specific data exists that is not included in the VIRP that supports the decision not to further characterize these impoundments. This data must be sufficient to demonstrate that samples collected were from the location of the former impoundment and that data reported is representative of the entire impoundment.

Risk Reduction Standards:

3. In a letter dated December 2, 2011, EPD approved the soil and groundwater risk reduction standards (RRS) for the site. Section 2.3.1 states that further clarification is needed from EPD to address all of the comments provided. EPD concurs with the RRS proposed in Table 1 and 2 of the VIRP, including the corrections to 1,2,3 trichloropropane (Soil Type 1 of 0.5 mg/kg and surface soil Type 3 of 1.9 mg/kg).

Professional Certification:

4. The VIRP did not include a monthly summary of hours invoiced and a description of services provided to the participant by a professional engineer/geologist as required by Section 6 of the checklist. The summary for all work completed to date should be included with the first semi-annual report.


Schedule:

5. In Section 3.3, Drexel proposes to re-evaluate groundwater after three years to determine if additional corrective action is necessary. However, the final remediation plan must be included in the October 8, 2013 progress report. Therefore, the groundwater evaluation must be completed and presented to EPD by that date.
6. Although Drexel does not have an access agreement with CSX for soil remediation at this time, please be aware that the Act requires a compliance status report to be submitted within sixty (60) months of acceptance into the program. By entering in the Program, Drexel has committed to obtaining access and completing corrective action within that timeframe.

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

If you have any questions, please contact John Maddox of the Response and Remediation Program at (404) 657-8600.

Sincerely,


Alexandra Y. Cleary
Program Manager
Response and Remediation Program

c: Kirk Kessler, P.G. Environmental Planning Specialists, Inc.