Georgia Department of Natural Resources
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Reply To:
Response Remediation Program
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April 30, 2012

FILE COPY

VIA EMAIL AND REGULAR MAIL

Dickies Industrial Services, Inc.
c/o Ms. Joan Sasine, Esq.
Bryan Cave Powell, Goldstein
One Atlantic Center, Fourteenth Floor
1201 W. Peachtree Street, NW
Atlanta, Georgia 30309

Re: VRP CSR and Plan to Maintain Compliance (March 30, 2011), Soil Sampling Report (December 21, 2010), Analytical Data for Delineation Well MW-40 (September 7, 2011), Response to Comments from Coca-Cola (June 3, 2011), and 2nd Semi-Annual Progress Report (October 21, 2011)
Former Dickies Industrial Services, Inc. Property, HSI #10127
Tax Parcels: 13-0036-LL-1349, -1414, -1463, and -1356
1411 Sullivan Road, College Park, Fulton County, Georgia 30337

Dear Ms. Sasine:

The Georgia Environmental Protection Division (EPD) has completed its review of your Voluntary Remediation Program Compliance Status Report (VRP CSR) dated March 30, 2011, which includes the Annual Groundwater Sampling Event (Appendix L) dated October 2010 and the Plan to Maintain Compliance (Appendix M). EPD has also completed its review of the December 21, 2010 Soil Sampling Report, delineation well MW-40 analytical data dated September 7, 2011, Response to Comments from Coca-Cola dated June 3, 2011, the 2nd Semi-Annual Progress Report dated October 21, 2011 and additional information submitted October 17, 2011.

Based on EPD's review of these documents and information in its files, EPD concurs that the property, Dickies Industrial Services, Incorporated (DISI), has been fully delineated and corrective action has been completed for Tax Parcels 13-0036-LL-1463 and 13-0036-LL-1356 in accordance with Type 3/4 Risk Reduction Standards as documented in the VRP CSR. As required by EPD, all comments from EPD's letter dated November 15, 2010 and from Coca-Cola's letter dated June 3, 2011 have been adequately addressed. Furthermore, EPD concurs that the soil for Tax Parcels 13-0036-LL-1349 and 13-0036-LL-1414 are in compliance with Type 1 Risk Reduction Standards (RRS), and also, that the soil for Tax Parcels 13-0036-LL-1463 and 13-0036-LL-1356 are in compliance with Type 3/4 RRS of §391-3-19-.07 of the Rules for Hazardous Site Response (Rules). Therefore, EPD approves the Plan to Maintain Compliance for Soil (Appendix M of the VRP CSR).

In order to remove site from the Hazardous Site Inventory, EPD requires that DISI implement an Environmental Covenant that incorporates the Plan to Maintain Compliance for Soil, restricts groundwater usage on the DISI property and provides for verification of the fate and transport modeling as allowed by O.C.G.A §12-8-107(g)(2) of the VRP Act. The following comments pertain to verification of the fate and transport modeling and should be addressed in future annual reports as required in the Environmental Covenant.

Comment #1: In response to previous EPD comments associated with the potential exposure pathway of an "unnamed tributary" 1,780-ft northeast of the site, in the apparent downgradient direction, ERM provided a BIOCHLOR analytical model to estimate the maximum concentration of the COCs that could be expected at the potential POE. The BIOCHLOR model is an acceptable model for use with the contaminants of concern identified in the groundwater at the site. However, the model has not been calibrated correctly to existing site conditions, and will need further validation by utilizing the additional data from future monitoring events. Additional comments associated with this model are included as follows:

a) For the initial calibration run, the model inputs should be calibrated to get a biotransformation centerline that closely matches the field data points input into Section 7 of the model. Normally the original source concentrations used in Section 6 should be an estimate of the original concentrations in groundwater at the time of the release and the simulation time should be the span of time from estimated date of release to the date of the site data that is input into Section 7 of the model. EPD would be willing to accept slight variations to this procedure based on certain site specific characteristics and data limitations as long as adequate supporting justification can provide.

b) EPD normally requires that two (2) validation runs be conducted once the model has been calibrated. The validation runs would use the same input values with the exception of the simulation time, which would be approximated based on actual groundwater sampling dates. If model predictions are not consistent with actual groundwater analytical data, the model should be recalibrated and/or the validity of the modeling software used should be re-evaluated. Current data along with at least one additional groundwater monitoring event in the last year of the 5-year monitoring period may be used to meet this requirement.

c) Once model calibration and validation is complete, should the model projections indicate that the projected maximum extent of the groundwater contaminant plume reach or exceed 1,780-ft at any concentration above the applicable in-stream water quality, additional groundwater and/or surface water monitoring will be required prior to or at the close of the monitoring period.

d) Please provide justification for the input parameters for the seepage velocity, i.e. hydraulic conductivity and effective porosity that are included in Section 1 of the model. In addition, please note that the hydraulic conductivity value of 5.00E-5 cm/s and the effective porosity value of 0.2 are not the most conservative values based on the available site data. As a result, EPD would recommend that more conservative values be input into the Section 1 of the model that will yield a seepage velocity closer to the annual groundwater flow velocities listed in the CSR for the site.

e) Please revise the K_{oc} values used in Section 3 of the model to match the corresponding values listed in the US EPA Chemical Specific Parameters table and recalculate the "Retardation Factor", http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/Generic_Tables/index.htm.

f) According to Section 6 of the model, the "Continuous Spacially-Varying" model option was used to develop the model outputs. EPD does not believe that there is a sufficient amount of the site data, specifically plume characterization data, to utilize this particular model output and recommends that the model be revised accordingly.

g) The Supplemental Report indicates that 2010 data was used, however the model input in Section 7 indicates that 2011 data was used. EPD could not confirm the accuracy of the site related concentration data that was input into the model as the data does not match any values included in any of the previous reports.

h) Please ensure that the TCE, DCE, and VC concentrations are input into the Field Data for Comparison (Section 7) at the "1-foot" distance for the applicable monitoring location, which EPD is assuming to be the data from monitoring location MW-1.

i) Please note that the centerline output screen (Figure 3) that was provided indicates a timeframe of 500-years while the input screen indicates a 100-year simulation timeframe. Please provide the appropriate supporting centerline output screen.

j) The values input into the Source DK model for 2006 and 2007 (0.0001 mg/L) appear to have been influenced by ongoing subsurface corrective action at the site and should be considered outliers that are not representative of normal trend behaviors for the contaminant plume. Please remove these values from the Source DK dataset for monitoring well MW-1 and re-run the model.

EPD's approval of this document extends only to those technical aspects of the document that expressly require EPD approval under applicable rules and statutes. This approval is not an endorsement by EPD that it accepts as conclusive any representations made in the document. Nor does EPD guarantee or warrant that the document is free of errors or omissions. EPD may later withdraw approval of this document, in whole or in part, if EPD determines that withdrawal is necessary to ensure compliance with the applicable rules and statutes.

Please provide the proposed Environmental Covenant by May 31, 2012 for EPD review prior to sending to interested parties and property abutters. If you have any questions regarding this matter, please contact Ms. Jacki Scarbary of the Response and Remediation Program at (404) 657-0489.

Sincerely,

David Brownlee
Acting Program Manager
Response and Remediation Program

c: Shanna Thompson, ERM

File: HSI #10127

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