

Georgia Department of Natural Resources

Environmental Protection Division

2 Martin Luther King, Jr. Dr., S.E., Suite 1054 East, Atlanta, Georgia 30334

Judson H. Turner, Director

Land Protection Branch

Phone: 404/657-8600 FAX: 404/657-0807

COPY

December 9, 2015

CEA, LLC

c/o W. Craig Baker

633 Chestnut Street Suite 1640

Chattanooga, Tennessee 37450

VIA EMAIL AND FIRST CLASS MAIL

Re: Approval of August 2015 Compliance Status Report
Capitol USA - Dalton Adhesives, HSI Site Number 10795
300 Cross Plains Boulevard
Dalton, Georgia; Whitfield County
Tax Parcel ID 13-099-08-000 and 13-099-09-000

Dear Mr. Baker:

The Georgia Environmental Protection Division (EPD) has reviewed the August 2015 Voluntary Remediation Program (VRP) Compliance Status Report (CSR), submitted to EPD by CEA, LLC pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100. A supplemental, revised certification to risk-reduction standards was submitted to EPD on November 30, 2015, via email. Based upon EPD's review of this document and information in its files, EPD concurs with your certification that contamination on the above referenced Capitol USA – Dalton Adhesives property has been fully delineated, and that the property is in compliance with Type 1 risk reductions standards for soil and Type 5 risk reduction standards for groundwater, pending the execution and court-recording of an environmental covenant. Therefore, the August 2015 CSR is hereby approved. Additionally, we provide the following comments:

1. EPD reviewed a draft environmental covenant submitted, via email, by attorney John Spinrad on September 28, 2015. Via our email reply of October 5, 2015, EPD approved a final version of the covenant. Accordingly, EPD did not review the draft environmental covenant in Appendix H of the CSR.
2. After evaluating the Bichlor model runs in the CSR, EPD believes that a first-order-decay coefficient of 4.000 for DCE provides a better match for the groundwater analytical data from November 2014 than does 8.000. Changing the decay coefficient to 4.000 and running the model shows that concentrations of DCE and vinyl chloride will still attenuate to 0.001 mg/L or less before reaching the point-of-demonstration well, MW-16.
3. After this site is removed from the HSI, sampling and laboratory analysis of groundwater from MW-15 will be required annually for a minimum of two years. EPD is requiring this sampling to confirm that groundwater concentrations remain within range of those projected in the Biochlor model runs. Analytes should include tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene (DCE), vinyl chloride, 1,1,1-trichloroethane (TCA), 1,1-dichloroethane (DCA), and chloroethane. Additionally, please add 1,1-DCE to the list of analytes, so that EPD can track the concentrations of that constituent.
4. Please submit a signed environmental covenant to the EPD for execution by the Director. Copies of the covenant should be provided to the persons and entities specified in O.C.G.A. 44-16-4(d) in advance of submittal of the signed covenant to EPD. Delivery receipts associated with those copies should be submitted to EPD with the signed covenant.

CEA, LLC 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 CEA, LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve CEA, LLC from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-3935.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: Timmerly Bullman, EPS (via email)
John Spinrad, Arnall Golden Gregory LLP (via email)

File: HSI Site 10795: Capitol USA-Dalton Adhesives