

# **Georgia Department of Natural Resources**

## **Environmental Protection Division-Land Protection Branch**

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

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

June 19, 2014

**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: Ecological Remedial Plan, December 21, 2012  
4<sup>th</sup> Semi-Annual VIRP Progress Report, April 25, 2013  
5<sup>th</sup> Semi-Annual VIRP Progress Report, December 18, 2013  
6<sup>th</sup> Semi-Annual VIRP Progress Report, April 23, 2014  
Goldkist Chemical Blending Site, HSI Site No. 10228  
120 Cape Road, Cordele, Crisp County  
Tax Parcel ID Nos. 040 031, 040 028, CSX Property LL74 and LL87

Dear Mr. Shankle:

The Georgia Environmental Protection Division (EPD) has reviewed the Ecological Remedial Plan dated December 21, 2012, and the April 2013, December 2013 and April 2014 Progress Reports submitted for the above referenced Site pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD recognizes the significant efforts of Drexel and EPS to move this project towards completion in compliance with the VRP schedule. We appreciate the professional oversight EPS has provided and the detailed area-averaging analysis and documentation included in the reports. EPD's comments are provided below:

1. EPD concurs that vertical delineation of groundwater is complete. Based on EDB detections in BW-5, EPD cannot concur that horizontal delineation of groundwater is complete but we do concur that an additional delineation well is not necessary at this time. Please continue to collect samples from BW-5 until the concentration of EDB is at or below the Type 1 Risk Reduction Standard.
2. Two minor inconsistencies were noted in Table 2 of the 6<sup>th</sup> VRP Progress Report regarding the Type 1 or Type 2 risk reduction standards (RRS) for groundwater. The Type 1 RRS for dibromo-3-chloropropane should be 0.2 ug/L and the Type 2 RRS for o-xylene should be 370 ug/L. These concentrations are consistent with the RRS values presented in the approved VRP application.

3. Groundwater sampling records should include a description of purging and sampling methods for each well sampled and should state whether low flow/low stress or low flow/low volume purging techniques were employed during purging. Because the FLUTe system installed in BW-6-1 is new and distinctly different from the other wells sampled on-site, greater detail on whether one or all of the ports were purged and how the ports are sampled individually should be provided in the next progress report.
4. EPD concurs that soil data submitted in the VRP Progress Reports demonstrates that horizontal and vertical delineation of regulated substances in soil is complete.
5. EPD concurs that excavation of the impacted soil from the former surface impoundments is complete. Soil data submitted in Section 4.7 of the April 2014 VRP Progress Report demonstrates that the Drexel West Exposure Domain is in compliance with residential RRS for soil in accordance with the VRP.
6. EPD approves the remedial plan to address remaining impacted soil at the site provided limited sidewall confirmation samples are collected from areas where historical data is not sufficient to document concentrations of regulated substances in soil to be left in place. These sidewall samples can be limited to spot checks of areas adjacent to the most heavily contaminated areas of the Drexel East Domain and only in the 0-2' and 5'-15' below ground surface intervals. Those concentrations should be compared to the maximum concentrations to be left on-site. If the concentrations identified in sidewall samples do not exceed the proposed maximum concentration for that constituent, then these sidewall sample analytical results do not need to be re-entered into the kriging analysis.
7. Future submissions demonstrating compliance of soil in the South Swale Exposure Domain should include a comparison of concentrations to be left on-site to the Ecological Remedial Goals (RG) provided in Table 1 of the Ecological Remedial Plan dated December 21, 2012 in addition to the approved RRS.
8. The Remedial Plan for groundwater and the revised groundwater monitoring plan are approved. Please continue to monitor groundwater in accordance with this plan until applicable RRS are achieved.
9. Please ensure that any treated groundwater discharged as described in Section 9.4.1.5 of the Remedial Plan is done so in accordance with all applicable local, state and federal laws and regulations.

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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.

EPD's approval of the above referenced documents extends only to those technical aspects of the documents 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 documents. Nor does EPD guarantee or warrant that the documents are free of errors or omissions. EPD may later withdraw approval of these documents, in whole or in part, if EPD determines that withdrawal is necessary to ensure compliance with the applicable rules and statutes.

Please address the above comments in subsequent semi-annual progress reports. EPD anticipates receipt of the next progress report by October 28, 2014. If you have any questions, please contact John Maddox at (404) 657-0490.

Sincerely,



Charles D. Williams  
Program Manager  
Response and Remediation Program

C: ✓Kirk Kessler, P.G., EPS

File: HSI 10228

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