



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

---

**Land Protection Branch**

2 Martin Luther King, Jr. Drive  
Suite 1054, East Tower  
Atlanta, Georgia 30334  
404-657-8600

December 2, 2016

Mr. Rob Savarese  
Chemtrade Solutions LLC  
6300 Philadelphia Pike  
Claymont, DE 19703

Re: Comments: Semi-Annual VRP Progress  
Report #7  
General Chemical Site  
East Point, Fulton County, HSI # 10498

Dear Mr. Savarese:

The Environmental Protection Division (EPD) is in receipt of the July 2016, Semi-Annual Groundwater Monitoring Report No. 16 [VRP Progress Report #7 (the Report)] for the General Chemical Site], in EastPoint, Fulton County. After completing a review of this report, EPD has prepared the following comments:

- 1) Per EPD's Letter of February 15, 2016, regarding the July 2015 & January 2016 VRP Progress Reports, the Report was to include certain updated information, which is not present:
  - a) The results of excavating and sampling the SW-07AA location and the attempt to locate an upstream source of impact.

The narrative in Section 3.3.4 contains the results of sampling SW-07AA as does Figure 3-6. However, Section 4.4, the tables, Appendix A and Appendix B lack any mention of this sample.
  - b) Update regarding the progress associated with implementing the proposed VRP Remediation Plan to address the surface water exposure pathway (i.e., slip line the storm water drains or perform any necessary repairs to prevent groundwater from entering the storm drain system). Please provide EPD with a status update and updated schedule for the site related corrective measures.
  - c) Update of the cost estimate for the remaining corrective measures to be completed at the site with an update to the associated financial assurance mechanism, as necessary. Please provide EPD with a status update and any necessary update to the associated financial assurance mechanism.

- 2) A figure(s) should be provided to visually support the narrative wherever appropriate. For instance:
  - a) Section 3.3.4 discusses stormwater samples that are cross gradient from the former HCA cells but are downgradient of the former acid pits. The provided figures fail to demonstrate the locations of the HCA cells, the acid pits and stormwater sample locations, and the topography / surface water gradients at the site;
  - b) Sections 3.2.3 and 3.3.3 discuss soil boring DB-05, its location relative to the acid pits and HCA impoundments, and the impact that might have regarding the sulfate concentrations. However, DB-05 is not shown on any figure; and
  - c) Neither Figure 1-3, nor Figure 3-6, demonstrates the flow direction in the stormwater drainage system.
- 3) While Figures 3-4 and 3-5 illustrate groundwater concentrations and the lateral extent of the area exceeding the Type 4 compliance criteria, the information is not included in the accompanying tables or narrative. Additionally, there is no information presented for surface water. Please ensure that future VRP Progress Reports include a comparison of site data to the applicable Type 1/4 risk reduction standards/clean-up criteria in figures, tables and narrative format.
- 4) The historical trend graphs shown in Figure(s) 3-2 are too small and cluttered to clearly portray movement towards stable or decreasing concentrations of contaminants. The narrative also states that the sulfate concentrations in several wells show a statistically significant decreasing trend. No supporting calculations, however, are provided for corroboration.
- 5) Sampling logs are inadequate to document that approved sampling protocols were followed.
  - a) Well sampling logs should include:
    - i) The height/placement of pump tubing or intake, whether using the “Tubing-in-Screen” method, sometimes referred to as the “Low Flow” method, or a micro-purge method,
    - ii) When the pump tubing or intake was placed in the well, and
    - iii) Pumping rates and purge volumes at every measurement.

In addition, the narrative fails to mention whether the EPA’s Field Branches Quality System and Technical Procedures (FBQSTP) Operating Procedure for “Groundwater Sampling”, SESDPROC-301-R3, were strictly adhered to, or if any variations occurred, and how such variations may have impacted the sampling.

- 6) The Report lacks Tables of historic groundwater quality data as measured in the field (e.g., DO, pH, temperature, turbidity, conductivity, ORP, elevation data, etc.).
- 7) The industrial property to the northwest of the site is primarily referred to as the Furman Fertilizer Co. in the Report and figures. Section 3.3.4, however, refers to MGA Holdings with regard to the same property without any discussion in the Report regarding the relationship between the two. While EPD is aware of the relationship, members of the public

who might be reviewing the files might not. Please provide a simple explanation of the relationship in future narratives.

Regarding MGA Holdings, as indicated in the Report, On February 9, 2016, EPD requested MGA Holdings to submit analytical data and a formal release notification for a release at the former “acid pit”. To date, EPD has not yet received a response to that correspondence.

The above listed comment must be addressed to EPD’s satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Please provide a response to the above listed comment as part of the next scheduled Progress Report submittal. If you should have any questions regarding this matter, please call Tom Brodell of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: Brian D. Jacobson, Geosyntec Consultants <BDJacobson@Geosyntec.com>

File: HSI # 10498

s:\rdrive\tbrodell\facilities - rrp\hsi\general chemical\vrp\vrp progress reports\1612 gen chemical vrp prog report 7 - comments.docx