

# Georgia Department of Natural Resources

## Environmental Protection Division – Land Protection Branch

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Judson H. Turner, Director

April 12, 2016

Mr. Kyle Phelps  
Capital City Bank  
1301 Metropolitan Boulevard  
Tallahassee, Florida 32308

Re: Semi-Annual VRP Progress Report, HSI # 10912  
Grantville Mill Property  
41 Industrial Way  
Grantville, Coweta County

Dear Mr. Phelps:


The Environmental Protection Division (EPD) is in receipt of the December 2015 VRP Progress Report (Report) for the Grantville Mill Property], in Grantville, Coweta County. After completing a review of this report, EPD has prepared the following comments:

- 1) According to the sampling logs, seven of the sixteen wells were purged less than three volumes. Seven other wells were purged more than five volumes, and one was purged over two days. There is no discussion of why the EPA's Field Branches Quality System and Technical Procedures (FBQSTP) were not followed and how this variation might have impacted the findings.
- 2) EPD cannot agree at this time that the vertical and horizontal delineation of contamination, especially horizontally to the west (of MW-6 and MW-8) is completed. The lithography and groundwater flow proposed for the conceptual site model is unclear at this time:
  - a) Figure No. 5, the property's potentiometric map, indicates a groundwater elevation at MW-5 that is higher than the elevation at MW-3 contrary to the potentiometric line drawn on the figure. Additionally, the groundwater elevation indicated for MW-8 would move the 845 foot potentiometric line to the east of the well.
  - b) Section 3.2 of the narrative describes a differing endpoint as the basis for terminating advancement of the boring when the first expansion of the monitoring well network is compared to the second. It is unclear why this difference exists.
  - c) Only one cross section, with a northeast-southwest orientation, was provided in the Application. While subsequently updated in the Progress Report, the geologic information of the original cross-section was removed from the updated figure. We suggest an east-west cross-section, showing the geology and hydrogeology of monitoring wells MW-11, MW-10, MW-4, MW-5 and MW-7, along with a north-south cross-section, showing monitoring wells MW-1, MW-15, MW-8 and MW-9, to provide additional clarity.
  - d) Logs of Boring Nos. MW-1 through MW-6 were not provided in either the VRP Application or the Progress Report.
  - e) The Log of Boring No. MW-12 graphically shows the sixth layer, gray clay with pyrite, as weathered rock rather than as clay.
  - f) The boring logs show the depth to water encountered first, but lack any notation concerning the presence of water at deeper depths.
  - g) The wells on the east side of the site have multiple clay layers while those on the west side of the site do not. Specifically, MW- 10, MW-11 and MW-12, all had multiple layers of clay and a saturated layer above where the wells were placed. There is no discussion of this in the narrative.

- h) MW-1 in Figure Nos. 3, 4 and 5 of the Progress Report is located approximately 150 feet north of the location shown in Figure Nos. 3C, 8, 9 and 11 of the Application.
- i) While contamination was not detected in MW-5D during the November sampling event, contamination has been detected in previous sample events. It is unclear if other wells are connected to the aquifer above or below the “hard geologic stratum layer encountered at 46 ft bgs” referenced in Section 3.3.3.
- j) Figure No. 4 should clarify that MW-1 through MW-12 data was collected in November 2015, whereas MW-13 through MW-15 data was collected in January 2016.

The above listed comments must be addressed to EPD’s satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Please provide responses to the above listed comments 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: Kirk Kessler, EPS <kkessler@envplanning.com>

File: HSI # 10912

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