

October 11, 2016

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

Re: Semi-Annual VRP Progress Report No. 2
HSI # 10912
Grantville Mill Property
41 Industrial Way
Grantville, Coweta County

Dear Mr. Phelps:

The Environmental Protection Division (EPD) is in receipt of the July 2016 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) The Report refers to specific numerical soil risk reduction standards (RRSs); however, EPD has no record of reviewing or approving such calculations. Please clarify.
- 2) According to the sampling logs for MW-16, the well development was conducted on June 21, 2016 from 11:00 to 15:15 using a low flow/low stress protocol. However, low flow/low stress protocols are not an approved method of developing a well [see the EPA's Field Branches Quality System and Technical Procedures (FBQSTP) Guidance Document "Design and Installation of Monitoring Wells", SESDGUID-101-R3].

Additionally, the documentation provided in the report (i.e., the sampling log in Appendix D) is insufficient to document the adequacy of well development. The well development record should consist of the following necessary information recorded on a form or log and included with any report.

- a) Development method(s), duration of time spent on development, volume of water removed, depth of the well, depth to top of the screen, diameter of the well, visual appearance (clarity), turbidity, pH, and specific electrical conductance of discharge water at various intervals.
- b) Information on recovery rates and estimated yield should also be documented. This information may be helpful in planning for sampling events and in sampling techniques.

- 3) According to the sampling logs for MW-16, sampling was conducted less than 24-hours after well development. EPD generally finds this is an insufficient time to allow for equilibration with the formation after development.
- 4) The Report states that groundwater sampling was performed following low flow/low stress protocols. However, the use of these procedures is acceptable only when the site hydrogeology is well understood, with respect to the hydraulic conductivity of geologic materials within the well screen interval. Neither the Application, nor VRP Progress Report No. 1 or 2, discuss the appropriateness of the use of these procedures with this site's unique hydrogeology.
- 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.
 - b) Soil gas sampling logs should include:
 - i) Except for the indoor air samples (I1-1 and IA-2, supplied in duplicate), sampling logs for the soil gas sampling were not provided.
 - ii) The information provided in the soil gas sampling logs was inadequate. EPA Method TO-15 is specific in what information, at a minimum must be recorded (see page 15-55 of the method to see the information required).

In addition, the narrative fails to mention whether the applicable FBQSTP procedures for soil gas sampling were strictly adhered to, or if any variations occurred, and how such variations may have impacted the sampling.
- 6) Laboratory analytical reports for the soil samples are not provided in this or any other appendix.
- 7) 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.)
- 8) In all tables and figures, instead of reporting analytical test results that are below the detection or reporting limit as "ND", please report the actual numerical limit with a less than symbol ("<") preceding the number. Please also provide the dates of sampling on Tables as applicable.
- 9) The boring logs for MW-1 through MW-6 are still missing. EPD previously noted in its review of VRP Progress Report No. 1, that these logs were not provided in either the progress report or the VRP Application. EPS notes these were done by a prior consultant. Please contact the prior consultant and request them for inclusion in a future progress report.

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>

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