



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

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Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

March 17, 2017

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

Re: Semi-Annual VRP Progress Report No. 3
HSI # 10912
Grantville Mill Property
41 Industrial Way
Grantville, Coweta County

Dear Mr. Phelps:

The Environmental Protection Division (EPD) is in receipt of the January 2017 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 indoor air sampling of the off-Site residence indicated that benzene was detected above the residential screening value (10^{-6} target cancer risk) developed by the US EPA for human health protection (US EPA, 2016). While benzene is not present in the groundwater plume, and no Site related chemicals were detected as a result of the sampling, the narrative fails to address whether or not the resident was notified of the results of the testing. If this has not occurred, EPD recommends the results of the sampling be provided to the resident as soon as possible, and in no case later than 30 days from receipt of this letter.

EPD also notes that the sampling log states that the canister was at or near zero pressure. The sampling protocol requires an actual value greater than zero to be recorded to ensure that the sampling did in fact take place during the entire 24-hour period. If there was truly no pressure left in the canister, the test may not have taken place over the required period of time.

- 2) According to the sampling logs for MW-18, the well was purged on November 1, 2016 from 10:45 to 11:22 using a micropurge protocol. However, the log does not indicate what the purpose of the purge was (i.e., well development or sampling). If the purge was for sampling of volatile organic compounds (VOCs), the listed sample method (direct) is incorrect.

Additionally, the documentation provided in the report (i.e., the sampling log in Appendix D) does not include documentation of the well development of MW-17 and MW-18. The well development record should be provided especially in light of EPD's prior concerns regarding adequacy of well development at the site.

- 3) While there were substantial improvements compared to the previous progress report, groundwater well sampling logs are inconsistent in documenting that approved sampling protocols were followed.

All well sampling logs should include:

- a) 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,
 - b) When the pump tubing or intake was placed in the well, and
 - c) Pumping rates and purge volumes at every measurement.
- 4) EPD appreciates the provision of the previously missing boring logs for MW-1 through MW-6, especially since these were done by a prior consultant. Some of the scans of these logs, however, are of less than desirable quality. If possible, please attempt a rescan with higher resolution and contrast to improve legibility.

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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