



**CONESTOGA-ROVERS  
& ASSOCIATES**

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July 14, 2014

Reference No. 035029

Mr. Jason Metzger  
Unit Manager  
Response and Remediation Program  
Environmental Protection Division  
2 Martin Luther King Junior Drive, SE  
Suite 1462, East Tower  
Atlanta, Georgia 30334

Dear Mr. Metzger:

Re: Arivec Chemical Site- Douglasville, Georgia

The Georgia EPD provided comments by letter dated May 28, 2014 on our recent April 15, 2014 Work Plan for the Arivec Chemicals Site. The April 15, 2014 Work Plan proposed a comprehensive groundwater monitoring program to assess the long-term impacts of the completed source (buried drum) removal work on groundwater quality. The May 28, 2014 EPD Comment letter also addresses the two previous submittals for the Site: The August 13, 2013 Status Update and the November 2012 Interim Progress Report.

The PRP Group intends to comply with EPD's request that a Soil CAP be provided by November 14, 2014. To comply with this request, the PRP Group will initiate the proposed groundwater monitoring strategy (April 15, 2014 Work Plan). The primary remediation goals of any corrective action related to soil include: protection of groundwater; and, elimination of the direct exposure pathway. The need for and extent of soil remediation will be determined based on the groundwater quality immediately downgradient of the former drum removal areas. Therefore, data from the proposed monitoring well network is critical for the development of an effective remediation plan.

The updated groundwater monitoring data will be used to identify and prioritize areas that may require further action to protect downgradient groundwater quality. Significant improvement of the groundwater quality has been observed at the MW-17R monitoring well location, which is located within the eastern-most buried drum removal area that was remediated in 2010. The concentrations of the analytes detected above the applicable Type 4 Risk Reduction Standards (RRS) in groundwater from monitoring well MW-17R in 2009 showed a significant reduction in 2013, post drum removal, as follows:

- benzene from 24 ug/L to non-detect (5.0 U µg/L);
- cis- 1,2-dichloroethene from 3,100 ug/L to 59 µg/L; and,
- vinyl chloride from 23 ug/L to non-detect (2.0 U µg/L)

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The PRP Group expects to install the additional monitoring wells in July 2014 and initiate groundwater monitoring in August 2014. Data will be incorporated into the Soil CAP due in November 2014.

In our April 15, 2014 submission, the PRP Group also proposed to initiate soil vapor monitoring up-gradient of the residence at 1551 Huey Road in an area where access had previously been granted for monitoring. Based on the difficulties encountered in obtaining access to area properties, this was proposed as the most expeditious option to obtain preliminary soil vapor data. Since we do not currently have access to any other locations pertinent to a soil vapor survey, the PRP Group will implement the work as proposed and use the data obtained to support development of a Soil Vapor Work Plan while access to additional area properties is requested.

As directed by the Arivec PRP Group, CRA will also proceed with additional off-Site residential well sampling, subject to obtaining necessary access. Further delineation northwest of MW-CRA-4S, 5S and 5B, has been previously attempted and permission to access, install monitoring wells and sample groundwater from the area south of Redcliff Drive on property owned by Luther Cochran has been requested on numerous occasions and through various property owners. The Group has made reasonable attempts to obtain access in the past and anticipates that EPD assistance will be required to gain access from the property owners at the end of Redcliff Drive.

CRA, on behalf of the Arivec PRP Group, will begin implementing the additional groundwater and soil vapor monitoring in accordance with the April 15, 2014 submittal. As requested by EPD, additional data and requested revisions/modifications will be incorporated into future submittals, as appropriate.

Sincerely,

CONESTOGA-ROVERS & ASSOCIATES

A handwritten signature in blue ink, appearing to read 'RTP', is written over a light blue horizontal line.

R.T. (Bob) Pyle

RTP/tb/4

cc: Arivec PRP Group  
Amy Magee, King & Spalding LLP