

Georgia Department of Natural Resources

Land Protection Branch-Environmental Protection Division

2 Martin Luther King Junior Dr., Suite 1054 East, Atlanta, Georgia 30334

Judson H. Turner, Director

404/657-8600

March 29, 2016

VIA EMAIL AND REGULAR MAIL

Georgia World Congress Center Authority
c/o Wayne Rosser, Maintenance/Physical Plant Manager
285 Andrew Young International Blvd., NW
Atlanta, Georgia 30313-1591

Re: Annual Groundwater Sampling Reports #9 and #10
Landfill Maintenance and Inspection Reports, Quarters #42 - #47
Northside Drive Landfill, HSI No. 10222
457 Northside Drive, Tax Parcel No. 14-82-6-12-1
Atlanta, Fulton County, Georgia

Dear Mr. Rosser:

EPD has reviewed the subject Annual Groundwater Sampling Report #10 (February 12, 2016) Annual Groundwater Sampling Report #9 (March 15, 2015), Landfill Maintenance and Inspection Reports for Quarters 46/47 (February 12, 2016), Quarters 44/45 (August 7, 2015), and Quarters 42/43 (February 13, 2015) for the above referenced property. The documents were submitted by Tetra Tech on behalf of the Georgia World Congress Center Authority (GWCC) as required by the Monitoring and Maintenance Plan for Type 5 Risk Reduction Standards-Northside Drive Landfill, Atlanta, Georgia, December 2003, Revised July 2005 (M&M Plan). EPD has the following comments:

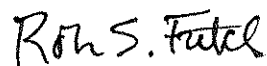
1. Beginning with the 9th annual groundwater sampling event conducted in January 2015, groundwater sample analytical methods were changed from EPA Method 8310 for PAHs and Method 6010C for metals to EPA Method 8270D with SIM for PAHs and EPA Method 6020A for metals. With the change in analytical methods, detections of PAHs above the reporting limits but below applicable Type 1 risk reduction standards (RRS) have been documented. Section 4.5 of Annual Groundwater Sampling Report #10 (Annual Report #10) requests the addition of EPA Method 8270D for SVOCs analysis at monitoring wells MM-04, MM-03, and MWC-1C to establish a baseline with the revised analytical methods and to determine if additional SVOCs are present in groundwater outside of the slurry wall. EPD approves the additional analysis, but please also conduct the dual analysis at MWC-3C, which is located in the apparent downgradient northwestern corner of the property.
2. Section 6.0 of the 10th Annual Report requests a change in sample frequency from annual to every other year beginning in December 2017, as annual sampling has been conducted for ten years with no detections above the Type 1 RRS. Given the recent change in analytical methods and the PAH detections above the method reporting limits at 8 of 10 monitoring wells in the existing network, a minimum of annual sampling should continue through December 2016 to establish a baseline with the revised analytical method as recommended by Tetra Tech in Section 4.5 of the 10th Annual Report. In addition, the groundwater monitoring program was established to assess any potential breaches in the slurry wall. Therefore, every other year, beginning in 2017, you may sample at a minimum, a subset of wells including MM-04, MM-03, MWC-1C, and MWC-3C. During the years when samples are only collected from the subset of monitoring wells, groundwater elevations should be collected twice a year from

all existing monitoring wells, including the dewatering well. EPD will continue to evaluate annual contaminant concentration trends to determine if a less stringent sampling program is appropriate.

3. The Quarters 46/47 Landfill Maintenance and Inspection Reports cite the observation of major damage to the Vegetative Cover and Drainage System during the December 22, 2015 inspection. According to Comment #1 of Tetra Tech's M&M Inspection Log for that date, "the compromises to the vegetative cover should be further investigated as the damage has worsened since it was documented in the September 2015 quarterly inspection report". The damage was evidenced in Photo #41, 42, 42A, and 44 of the Quarter 47 photo log. EPD is concerned that some of the damage appears to be close to the boundary of the underlying engineered control cap. Please note that any damage that is characterized as major damage for the vegetative cover and drainage system should be addressed in accordance to Sections 4.1 and 4.2, respectively of the M&M Plan. Since the time frames for repair have been surpassed, please repair the major damage prior to the June 2016 quarterly inspection. The repairs should be documented in the August 2016 Landfill Maintenance and Inspection Report.
4. EPD noted some drainage structures that appeared to be blocked with debris (i.e. gravel, sediment, vegetation) in the various photos in the quarterly photo logs. Please ensure that any observed debris is removed and properly disposed as required by Section 4.2 of the M&M Plan.
5. The Quarter 47 photo log did not document the status of the restored asphalt patches for the August 2013 Subsurface Investigation direct push locations. Please ensure that the photos are included in future quarterly inspection photo logs.
6. For ease of review, please ensure that figures with photo locations that correspond to the photo logs are included in the *Annual Groundwater Sampling Reports* and Landfill Maintenance and Inspection Reports.

Please address the comments listed above in the next semiannual Landfill Maintenance and Inspection Report, which is due by August 15, 2016 and/ or the Annual Groundwater Sampling Report, which is due by February 15, 2017, as appropriate. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at (404) 657-0487.

Sincerely,



Robin S. Futch, P.G.
Acting Unit Coordinator
Response and Remediation Program

c: Christopher Jones, Tetra Tech (Via Email)
Joan Sasine, Bryan Cave (Via Email)

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