REPORT

Voluntary Remediation Program Semiannual Status Report Former Oxford Chemical Property 5001 Peachtree Boulevard DeKalb County Chamblee, Georgia

> Project Number 2015.0023.12

> > Report Date: March 31, 2016





March 31, 2016

Robin Futch, PG Unit Coordinator **Response and Remediation Program** Land Protection Branch, GA EPD 2 Martin Luther King Jr. Drive Suite 1054 East Atlanta, GA 30334-9000

RE: Voluntary Remediation Program Semiannual Status Report – March 2016
Former Oxford Chemical Property
5001 Peachtree Boulevard
Chamblee, DeKalb County, Georgia
Project No. 2015.0023.12

Dear Ms. Futch:

United Consulting is submitting this report for the above-referenced project on behalf of Rathon Corporation and Tyson Foods (formerly The Hillshire Brands Company). This report describes activities that have been performed from August 15, 2015 through March 29, 2016, and projected work to be performed during the next six month period. Please contact me if you have any questions or comments regarding the information contained herein.

Sincerely,

UNITED CONSULTING

Leonard J. Diprima, Jr., P.G. Project Manager/Associate Environmental Specialist

Russell C. Griebel, P.G., C.P.G. Executive Vice President

Cc: Jason Metzger, GAEPD Ben Moline, Rathon Corporation Kirby McCalister, Tyson Foods, Inc. Andrea Rimer, Troutman Sanders LLP

LJD/RCG/nm

SharePoint: 2015.0023.12



Voluntary Remediation Program Semiannual Status Report



Former Oxford Chemical Property 5001 Peachtree Boulevard, Chamblee, DeKalb County, Georgia

HSRA Sublisted Property of the General Electric International, Inc. Apparatus Service Center Site 5035 Peachtree Boulevard, Chamblee, DeKalb County, Georgia HSI No. 10072

Prepared For

Rathon Corporation P.O. Box 4030 Golden, CO 80401 **Tyson Foods, Inc.** 2200 Don Tyson Parkway Springdale, AR 72762

Prepared by



Project No. 2015.0015.12 March 31, 2016

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Section 1 PE/PG Certification

I certify under penalty of law that this report and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, <u>et seq</u>.). I am a professional geologist who is registered with the Georgia State Board of Registration for Professional Geologists and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances.

Furthermore, to document my direct oversight of the Voluntary Remediation Plan development, implementation of corrective action, and long term monitoring, I have attached a monthly summary of hours invoiced and description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division.

The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Leonard J. Diprima, Jr. / Georgia PG #949 March 31, 2016

Printed Name and GA PE/PG Number

Date

Signature and Stamp







Section 2 Introduction

United Consulting (United) has prepared this Voluntary Remediation Program (VRP) Semiannual Status Report (Status Report) for the Former Oxford Chemical property located at 5001 Peachtree Boulevard, Chamblee, DeKalb County, Georgia; Tax Parcel No. 18-278-14-002 (Site). The Site was formerly regulated under the Georgia Environmental Protection Division (EPD) Hazardous Site Response Act (HSRA) Program as a sublisted property immediately adjacent to the General Electric International, Inc. Apparatus Service Center site (GE Facility), 5035 Peachtree Boulevard, Chamblee, Georgia, Hazardous Site Inventory (HSI) No. 10072.

On April 1, 2013, a Voluntary Investigation and Remediation Plan Application (VIRP) for the Site was submitted to the Georgia Environmental Protection Division (EPD) Hazardous Sites Response (HSRA) Program. On July 10, 2013, the EPD approved the VIRP with comments and entered the Site into the VRP. The most recent semi-annual status report for the Site was submitted to EPD on August 31, 2015. This Status Report has been prepared to present the activities conducted from August 15, 2015 through March 29, 2016 for the Site in accordance with the VRP.

2.1 Previous Semi-Annual Status Report Comments

The previous Semi-Annual Status Report for this Site was submitted to EPD on August 31, 2015, covering Site activities through August 14, 2015. EPD provided comments on the report on February 4, 2016 (see Appendix A). Following are responses to those comments.

EPD Comment 1: The fate and transport model documentation and results for both chlorinated ethenes and chlorinated benzenes is a valid representation of site conditions and potential future conditions related to the plume and downgradient surface water. EPD approves the modeling inputs used as well as the modeling conclusions.

Response: EPD comment noted.

EPD Comment 2: Issues with groundwater sampling were again noted. It appears that turbidity was not assessed so could not have been considered for stabilization. It was unclear if pump intake was placed at the mid-point of the screened interval, as per EPA low-flow sampling guidance SESDPROC-301-R3. Please ensure that this and other applicable procedures are uniformly adhered to and accurately reported on sampling logs.

Response:

Groundwater sampling was conducted in accordance with EPA low-flow sampling guidance SESDPROC-301-R3. Outputs from the instrument measuring field parameters were downloaded, including turbidity measurements, which were considered for stabilization. Unfortunately, the turbidity measurements were cut off in the final printing of the monitoring well sampling sheets. This will be corrected and resubmitted to the EPD in the next report. In addition, though the intake position of the sample tubing was noted in the monitoring well sampling sheets, and intakes were placed in the center of the well screens, better notations will be presented in the future so the EPD and others may clearly identify the intake position relative to the screened interval of each monitoring wells.





Section 3 Work Performed – August 15, 2015 through March 29, 2016

The activities currently identified to be performed at the Site under the VRP are outlined in the following documents:

- VIRP dated March 31, 2013;
- EPD VIRP approval letter dated July 10, 2013; and
- VRP Semiannual Status Report dated August 31, 2015.

The activities performed in accordance with the VRP from August 15, 2015 through March 28, 2016 are as follows:

• Execution of a Uniform Environmental Covenant for the former Oxford Chemical property.

Details associated with this activity are presented below.

3.1 Uniform Environmental Covenant

During this period, the revised and final version of the Uniform Environmental Covenant (UEC) for the Former Oxford Chemical property was approved by EPD, and on March 29, 2016 the final signed version of the UEC was submitted to EPD under separate cover for execution by the Director. Once fully executed, the UEC will be recorded with the Fulton County Clerk of Superior Court and a final recorded version will be provided to EPD and included with the Compliance Status Report for the Site.

3.2 Redevelopment Activities

During this period, Peachtree Crossing, LLC began commercial, non-residential redevelopment of the property, subject to the requirements of the Limitation of Liability obtained pursuant to the Georgia Brownfield Act, and the requirements set forth at this time under the VRP.





Section 4 VRP Implementation Summary

As described in previous submittals, the potential exposure pathways for the historical releases of regulated constituents that were identified during the execution of the VRP at the Site are:

- Potential for exposure to impacted soil above HSRA non-residential RRS;
- Potential for exposure to impacted groundwater as drinking water;
- Potential for exposure to impacted groundwater entering downgradient surface water;
- Potential for exposure to VOCs released from impacted soil or impacted groundwater through vapors entering enclosed structures on the Site; and
- Potential for exposure to VOCs released from impacted groundwater from the Site through vapors entering enclosed structures on downgradient properties.

Through the completion of previous activities to date, each of these exposure pathways has been evaluated and addressed where a completed exposure pathway has been identified, or where data collection and modeling has indicated a higher potential for a completed exposure pathway either now or in the future. The results of these evaluations and actions were summarized in detail in the previous Semiannual Status Report dated August 31, 2015. As stated in EPD's February 4, 2016 correspondence (see Appendix A) following its review of the August 31, 2016 Semiannual Status Report:

The fate and transport model documentation and results for both chlorinated ethenes and chlorinated benzenes is a valid representation of site conditions and potential future conditions related to the plume and downgradient surface water. EPD approves the modeling inputs used as well as the modeling conclusions.

The conclusions, presented in the August 31, 2016 Semiannual Status Report, related to the potential exposure pathways are briefly summarized again below.

- Soil. Soil impacts resulting from historical releases at the Site were delineated to method detection limits or HSRA Type 1 RRS for the constituents of interest (COI). It was determined that all COI in soil were confined to the former Oxford Chemical property and soil impacts had not extended off the property. Soil impacts above approved non-residential RRS were remediated through excavation and off-site disposal at a Subtitle D, non-hazardous landfill. A Certification of Compliance for soil with non-residential RRS was submitted and subsequently approved by EPD on October 16, 2014, thus eliminating the soil exposure pathway for COI based on future non-residential use. Future non-residential use was further ensured through the Site's entry into the Georgia Brownfields Program as a non-residential property and through the execution of a UEC prohibiting future residential use as described in Section 3.1 above.
- **Groundwater**. Groundwater impacts resulting from historical releases at the Site are present above USEPA Drinking Water Maximum Contaminant Levels (MCLs) and HSRA RRS for some COI. Groundwater use for potable water is prohibited in the community in which the Site is located due to local ordinance. In addition, the Site was not listed on the Georgia Hazardous Site Inventory (HSI) for groundwater, but sublisted under the adjacent General Electric International, Inc. Apparatus Service Center Site,





5035 Peachtree Boulevard, Chamblee, Georgia, HSI# 10072, due to a release of freephase mineral oil impacted with PCBs and chlorinated solvents that had migrated onto the Site; therefore, as a result of this original sublisting, the drinking water exposure pathway was not required to be considered. In any event, the future use of groundwater for drinking water or any non-remedial purpose at the Site will be prohibited by the UEC described in Section 3.1 above.

- **Surface Water**. Groundwater impacts resulting from historical releases at the Site are present at concentrations above ISWQS. The closest downgradient surface water body receptor is a small creek located 686 to 591 meters from the Site source areas as measured along the axis of inferred groundwater flow. Groundwater modeling conducted for the Site determined key COI and daughter products would not reach the creek above ISWQS, or current analytical method detection limits. Therefore, it is projected that this potential exposure pathway will not be completed now or in the future.
- **On-Site Vapor Intrusion**. Due to the presence of VOCs in soil in some areas of the Site below non-residential RRS and remaining concentrations of VOCs in groundwater, the potential exists for vapor intrusion into future enclosed structures built on the property. Contour Engineering (Contour), representing the commercial developer for the Site, conducted a vapor assessment based upon current VOC impacts in groundwater, and collected soil gas samples from the Site which were input into the J&E model using design criteria for the proposed future structures. The Contour report concluded that the proposed structures would be at risk for potential vapor intrusion, and vapor mitigation measures were designed for the enclosed structures planned for the Site. The Site's entry into the Brownfields Program ensures that vapor intrusion and mitigation will be appropriately addressed, and the UEC includes ongoing vapor mitigation requirements, in coordination with EPD. These mechanisms will ensure that the vapor exposure pathway is not completed in the future on the Site.
- **Off-Site Vapor Intrusion**. Groundwater impacted with VOCs is present downgradient of the Site. Properties along the flow path of the VOC plumes were identified and were evaluated for the potential for vapor intrusion from current and potential future concentrations of key COI. The properties that were determined to have the potential for vapor intrusion into current and future structures include the immediately adjacent and downgradient Peachtree Crossing, LLC properties (formerly owned by Peachtree Village Partners LLC) being redeveloped as noted above (Tax Parcels 18-278-14-006, 18-278-14-008, 18-278-14-007 and 18-278-14-005), and the downgradient Zaxby's restaurant property (Tax Parcel 18-300-02-043). These properties were evaluated for potential vapor intrusion, which included collection of additional soil gas samples on the adjacent downgradient Peachtree Crossing, LLC properties. Soil gas samples were also collected on the Peachtree Crossing, LLC properties by Contour for purposes of proposed redevelopment. J&E models were also run by United Consulting to evaluate the current enclosed structures on the Peachtree Crossing, LLC properties, and by Contour to evaluate potential future structures for redevelopment. Both the current and future structures passed the J&E commercial scenario evaluation relative to groundwater concentrations identified prior to modeling. However, to mitigate any potential risk from vapor intrusion on these properties resulting from the future migration of the key COI onto the properties at potentially higher concentrations, it is our understanding that the





development of the downgradient Peachtree Crossing, LLC properties will include vapor mitigation measures beneath future enclosed structures through the Brownfields Program. These measures will also mitigate the potential vapor intrusion pathway on these properties for purposes of the VRP.

The downgradient Zaxby's restaurant property was evaluated for potential vapor intrusion and the Vapor Intrusion Modeling Assessment was included in the previous Semiannual Status Report dated August 31, 2015. The J&E model results were below non-residential threshold limits using both the current concentrations of the key VOC COI immediately upgradient at the time, and modeled future COI concentrations in groundwater on this property. Based on the evaluations of potential exposure pathways from vapor intrusion on the Zaxby's restaurant property, the exposure pathway was not currently complete, nor was there a potential risk in the future.

4.1 Request for, and Justification for No Further Monitoring

Based upon the absence and/or mitigation of current and potential future exposure pathways resulting from historical releases from the Former Oxford Chemical VRP Site, United Consulting as the environmental professional for the Site, requests and recommends that no further action or monitoring of releases associated with the Site under the VRP be conducted. Exposure pathways for COI have been mitigated through active remediation and through the execution of a UEC requiring use limitations for the Site under the VRP, and through entry of the Site and immediately downgradient properties into the Georgia Brownfields Program.





Section 5 Work to be Performed

The primary task anticipated to be completed during the next reporting period ending August 31, 2016 for the VRP will be determined based upon EPD's review of the information provided herein. If the EPD concurs with the proposed no further action or monitoring at the VRP Site proposed in Section 4.1 above, the final task associated with the VRP will be the submittal of a VRP Compliance Status Report (CSR) during the next reporting period. The CSR will include the fully executed UEC for the former Oxford Chemical property. This task will be completed no later than August 31, 2016.





Section 6 Professional Services Hours This Period





A total of approximately 252.5 professional service hours have been completed by United Consulting during the period from August 13, 2015 through March 29, 2016. Of these total hours, approximately 89.25 hours were utilized by the professional geologist overseeing the VRP project.

Appendix A Regulatory Documents





Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch 2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334 (404) 657-8600; Fax (404) 657-0807 Judson H. Turner, Director

February 4, 2016

VIA E-MAIL AND REGULAR MAIL

Rathon Corporation c/o Mr. Michael J. Glade, P.E. Vice President P.O. Box 4030, Suite 400 Golden, Colorado 80401 The Hillshire Brands Company c/o Mr. Kent B. Magill, Esq. Executive Vice President 400 South Jefferson Street Chicago, Illinois 60607

Re: Voluntary Remediation Program Semi-Annual Status Report, August 31, 2015
Former Oxford Chemical Property (Rathon), Sublisted to HSI Site No. 10072
5001 Peachtree Blvd, Chamblee, DeKalb County, Georgia
Tax Parcel 18-278-14-002

Dear Messrs. Glade and Magill:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program (VRP) Semi-Annual Status Report for the former Oxford Chemical Site dated August 31, 2015. EPD has considered the conclusions and recommendations of the Report as well as the discussions from the meeting held at EPD offices on September 2, 2015. Our comments are summarized below.

- 1. The fate and transport model documentation and results for both chlorinated ethenes and chlorinated benzenes is a valid representation of site conditions and potential future conditions related to the plume and downgradient surface water. EPD approves the modeling inputs used as well as the modeling conclusions.
- 2. Issues with groundwater sampling were again noted. It appears that turbidity was not assessed so could not have been considered for stabilization. It was unclear if pump intake was placed at the mid-point of the screened interval, as per EPA low-flow sampling guidance SESDPROC-301-R3. Please ensure that this and other applicable procedures are uniformly adhered to and accurately reported on sampling logs.

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. EPD concurs that all potential exposure pathways have been adequately addressed under the VRP, upon recording of the Environmental Covenant (EC) referred to in the report. As your next progress report, due February 28, 2016, please submit a scheduled for recording the EC and submittal of the VRP CSR. The CSR should include a proposed groundwater monitoring program in accordance with Section 12-8-10 (g)(2) of the Act or a justification for no further monitoring, as the environmental professional. Should you have any additional questions or concerns please contact Robin Futch, P.G. at (404) 657-8686.

Sincerely,

Ron Fuld

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