Georgia Department of Natural Resources
Environmental Protection Division
2 Martin Luther King, Jr. Dr., S.E., Suite 1054 East, Atlanta, Georgia 30334
Judson H. Turner, Director
Land Protection Branch
Phone: 404/657-8600 FAX: 404/657-0807

August 25, 2015

VIA EMAIL AND FIRST-CLASS MAIL

Robert Lewis
Genuine Parts Company
2999 Circle 75 Parkway
Atlanta, Georgia 30339

Re: Comments on Voluntary Remediation Program Semiannual Reports 1, 2, 3, and 6-Month eGeo System Report
Rayloc Facility, HSI Site Number 10547
Atlanta, Georgia; Fulton County

Dear Mr. Lewis:

The Georgia Environmental Protection Division (EPD) has completed its review of the above-referenced documents. Semiannual reports 1, 2, and 3 were submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). Our comments are provided below.

First Semiannual VRP Progress Report

1. This report did not contain any groundwater-sampling results. EPD would prefer that groundwater sampling be conducted on a specified, periodic basis. Accordingly,

   a. Propose a groundwater-sampling program that specifies which wells are to be sampled on a periodic basis. EPD would prefer that the proposed sampling points be identical or similar to the sampling points specified in the Performance Management Plan (PMP). The PMP was submitted to EPD by Oasis Environmental, as part of a document entitled "Response to Conditional Approval of Corrective Action Plan," dated August 20, 2012.

   b. EPD has had to expend significant time and effort cross-referencing tables with figures in conducting this review. To expedite the EPD review process, current groundwater-analytical results should be depicted on figures, with groundwater-contaminant concentrations specified next to the sampling locations. Due to the multiple areas of the site being investigated, groundwater-sampling results can be depicted on several figures, or by using insets and callouts on a single figure.

   c. Due to the complex nature of the site and the multiple areas of concern, EPD must have a reliable and consistent means to track groundwater-contaminant trends and migration. Accordingly, each VRP semiannual report should contain a table listing historical groundwater-contaminant concentrations. The table should be as comprehensive as possible, with analytical data from every sampling point.

   d. Each VRP semiannual report should contain two groundwater potentiometric-surface maps, one constructed from data obtained during the most recent groundwater-monitoring event, and one constructed from data obtained during the previous groundwater-monitoring event.

   e. Each VRP semiannual report should contain a narrative describing the groundwater-sampling protocol, along with an evaluation of the latest groundwater analytical testing. EPD requires adherence to the USEPA Region 4 groundwater sampling operating procedures (OPs), "Procedure SESDPROC-301-R3, Groundwater Sampling," effective March 6, 2013. The OPs can be accessed on the Internet at http://www.epa.gov/region4/sesd/fbqstp.

f. Each VRP semiannual report should include groundwater-sampling field logs.

2. EPD has had to expend significant time and effort cross-referencing tables with figures in conducting this review (see Comment 1b above). To expedite the EPD review process, current soil analytical results should be depicted on a figure, with contaminant concentrations specified next to the sampling locations. Due to the multiple areas of the site being investigated, soil-sampling results may be depicted on several figures or by using insets and callouts on a single figure.

3. Regarding the stormwater sewer along the western Rayloc boundary, please describe the stormwater-sewer discharge-point location in a brief narrative; also, specify the discharge point's distance from the Rayloc property, and show the discharge point's location on a figure (aerial photograph preferred).

4. The Anaconda Aluminum potable well, located 1.5 miles southwest of the site, is too far from the site to be designated as the point of exposure (POE). For the Rayloc site, the POE should be a hypothetical point of drinking-water exposure located 1,000 feet downgradient from the delineated site contamination (contaminant plume), unless an existing point of drinking-water exposure is identified closer to the site (see Section 12-8-102(b)(11) of the Act).

5. The location of the point-of-demonstration (POD) well will be dependent upon the location of the POE. EPD is not convinced that MW-10 will suffice as a POD well, because the boundaries and extent of the dissolved contaminant plume have not been clearly established. On many VRP sites, groundwater-contaminant fate-and-transport modeling is required, to demonstrate that the POD well will not be impacted by groundwater contaminants originating from the site. In relatively simple, analytical models such as Biochlor, field data for calibration is preferably obtained from or near the centerline of the contaminant plume. Accordingly:

   a. EPD recommends preparation of isoconcentration maps encompassing the entire site (which includes off-site properties) to aid in approximating the extent and boundaries of the dissolved contaminant plume (or plumes).

   b. One or more POEs should be designated downgradient of the contaminant plume, in accordance with the Act. The precise POE location, or locations if more than one groundwater flow direction from the source area is identified, should be based upon groundwater-flow direction, as indicated on potentiometric-surface maps, and also based upon the shape and extent of the current contaminant plume (or plumes).

   c. One or more POD wells will be necessary downgradient of the contaminant plume and upgradient of the POE, on or close to the extrapolated centerline of the contaminant plume. The POD well locations should be based upon groundwater-flow direction, as indicated on potentiometric-surface maps, and also based upon the shape and extent of the current contaminant plume (or plumes). If existing wells are not in suitable locations, installation of one or more additional wells will be required.

6. To expedite EPD reviews of tables listing soil and groundwater analytical results, please highlight exceedances of applicable risk reduction standards (RRSs). Highlighting of laboratory detections below the applicable RRS is not necessary. Include the applicable RRS value in each column or row where a regulated substance is specified.

7. Regarding the injection-well schematics in Appendix E:

   a. EPD could not locate wells A1-I1B, A1-I2B, and A1-I3B on any of the figures in the report.

   b. The well schematics did not include the boring diameter.

c. Wells A1-I1B, A1-I2B, and A1-I3B were installed in bedrock, apparently with a single casing. EPD recommends the use of a double-casing when installing bedrock wells, to avoid possible cross-contamination between the unconsolidated and bedrock aquifers.

d. EPD notes that several of the newly installed injection wells were installed with the top of the screened interval 20 feet or more below the water table. Accordingly, EPD is doubtful that those wells will contribute to vadose-zone remediation.

Second Semiannual VRP Progress Report

8. This report did not include a discussion of groundwater quality and sampling protocol. See Comment 1 above.

9. Effluent air from the vapor-treatment system should be monitored and VOC concentrations recorded on a periodic basis. Please tabulate effluent data in future reports.

10. Section 3.7 states that three proposed monitoring wells will be installed within two months, and to refer to Figure 5 for the proposed monitoring well locations. EPD could not locate the proposed monitoring well locations on Figure 5.

Third Semiannual VRP Progress Report

11. Regarding the column entitled "Type 3 RRS" in Table 2:

    a. RRS values for all the listed regulated substances should be provided. Calculations must accompany newly calculated RRS values, which will need to be approved by EPD.

    b. EPD was unable to find a footnote or other reference in the report that explains the notation "NA[2]".

12. Please provide a system flow diagram for the AS/SVE system currently in use in the former parts disassembly and cleaning area.

13. This report did not include a discussion of groundwater quality and sampling protocol. See Comment 1 above.

14. On Figure 2, a label next to the northern site boundary reads "Potential Location of 20,000-gallon UST." However, the first semiannual report stated that the 20,000-gallon UST was closed by removal in 1993. Please change the label to read "Probable former location of 20,000-gallon UST," or "Former location of 20,000-gallon UST" if that former location for the UST has been confirmed.

15. The laboratory reporting limit for vinyl chloride in groundwater, at 0.005 mg/L, is too high. The Type 1/3 RRS for vinyl chloride in groundwater is 0.002 mg/L. Accordingly, the laboratory detection limit should be 0.002 mg/L or less.

6-Month eGeo System Report, dated October 31, 2013

EPD has no comments on this report. The eGeo system was addressed in the VRP semiannual reports.

Genuine Parts Company must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards, and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Genuine Parts Company. However, failure of EPD to respond to a submittal within any timeframe does not relieve Genuine Parts Company from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-8600.

Sincerely,

David Brownlee
Unit Coordinator
Response and Remediation Program

c: Jack Wintle, Clearwater Environmental Resources