

# 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

October 9, 2015

### VIA U.S. MAIL AND E-MAIL

Trademark Metals Recycling, LLC  
c/o Ms. Brenda Anderson, Environmental Manager  
5220 Dover Street  
Tampa, FL 33606

Re: VRP Status Report (November 26, 2014), Progress Report #1 (*Interim Site Investigation Report, December 30, 2014*), and Progress Report #2 (*Status Report, May 28, 2015*)  
Trademark Metals Recycling (f/k/a Rice Iron and Metal), HSI #10923/VRP1348601340  
2000 West Savannah Avenue, Tax Parcel 0121A 026  
Valdosta, Lowndes County, Georgia 31603

Dear Ms. Anderson:

The Georgia Environmental Protection Division (EPD) has reviewed the subject reports for the referenced site. EPD requested a meeting with representatives of Trademark Metals Recycling and their environmental consultant (Gannett Fleming, Inc.) to discuss comments related to these reports. The requested meeting occurred at the site on August 7, 2015. Ms. Carolyn Daniels of EPD summarized the meeting in an August 13, 2015 email (enclosed) to Mr. Brian Lenihan and Mr. Anthony Hoffman. The comments discussed at the meeting should assist in both the preparation of future reports for EPD review and meeting the Voluntary Remediation Program milestone schedule.

EPD anticipates that many of the comments will be addressed in the next semi-annual progress report, which is due by November 22, 2015. Therefore, EPD will defer issuance of additional written comments until after our review of the next report. If you have any questions, please contact Carolyn L. Daniels, P.G. of my office at (404) 657-8646.

Sincerely,



David Hayes  
Acting Unit Coordinator  
Response and Remediation Program

Enclosure: Summary of August 7, 2015 On-Site Meeting

c: Mr. Brian Lenihan, CHMM, The David J. Joseph Company (e-mail)  
Mr. Ronald Leins and Mr. Anthony Hoffman, P.E., Gannett Fleming, Inc. (e-mail)

File: 254-0068, VRP

## Daniels, Carolyn

---

**From:** Lenihan, Brian <Brian.Lenihan@DJJ.com>  
**Sent:** Thursday, August 13, 2015 4:03 PM  
**To:** Daniels, Carolyn; axhoffman@gfnet.com  
**Cc:** Metzger, Jason; Reuland, David; Futch, Robin  
**Subject:** RE: On-Site Meeting for Rice Iron and Metal (Former), VRP and HSI #10923 Site, 2000 Savannah Hwy, Valdosta, Lowndes Co., Georgia

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thanks for your time. We also thought the meeting was very productive and look forward to working with you on keeping the project on track. Thanks for the summary and we will be in touch.

Brian Lenihan, CHMM  
Environmental Specialist

***The David J. Joseph Company***

PO Box 6521

Louisville, Kentucky 40206

Office: 502-212-7386

Fax: 502-587-8699

Cell: 502-715-1426

**From:** Daniels, Carolyn [mailto:Carolyn.Daniels@dnr.ga.gov]  
**Sent:** Thursday, August 13, 2015 2:11 PM  
**To:** axhoffman@gfnet.com; Lenihan, Brian <Brian.Lenihan@DJJ.com>  
**Cc:** Metzger, Jason <Jason.Metzger@dnr.ga.gov>; Reuland, David <David.Reuland@dnr.ga.gov>; Futch, Robin <Robin.Futch@dnr.ga.gov>  
**Subject:** On-Site Meeting for Rice Iron and Metal (Former), VRP and HSI #10923 Site, 2000 Savannah Hwy, Valdosta, Lowndes Co., Georgia

Anthony and Brian,

Thank you for meeting with Robin and me this past Friday. We thought the meeting was very productive.

I wanted to send this email to briefly summarize the results of the meeting as I will be out of the office beginning tomorrow until August 26, 2015 and unavailable for questions.

During the meeting we discussed the following:

- The Georgia Hazardous Site Response Rules (the Rules) and Voluntary Remediation Act (the Act) and how they applied to the site: EPD personnel stated that the VRP Compliance Status Report (CSR), demonstrating compliance with applicable cleanup standards, must be submitted on or before May 22, 2019. If for some reason that milestone could not be met, Trademark would have to petition for a date extension from the EPD Director and corrective action would then have to be conducted under a Consent Order.
- Basic requirements for obtaining a delisting of the site from the Hazardous Site Inventory (HSI) pursuant to both: Ms. Daniels stated that the final CSR could be submitted prior to the May 22, 2018 deadline if sufficient information is available to demonstrate that the site is in compliance with appropriate cleanup standards. Groundwater monitoring may be required subsequent to delisting. Ms. Daniels expressed concern

that the May 22, 2018 CSR deadline might not be achievable if Trademark did not proceed with the additional investigations that are necessary and revise future progress reports to address the May 22, 2014 EPD comments on the March 2013 Voluntary Investigation and Remediation Plan (VIRP).

- Specific May 22, 2014 EPD comments on the March 2013 Voluntary Investigation and Remediation Plan that should be addressed and, include, but not are limited to:
  - Revisions, deletions, and/or additions to tables and figures summarizing: Contaminants of Concern (COCs), Proposed target cleanup standards, additional information to be posted and/or depicted on cross-sections, analytical summary tables and figures, etc.
  - Determination of cleanup standards: EPD recommended that Type 2 through 4 soil and groundwater Risk Reduction Standards (RRS) be calculated and proposed by Trademark's consultant as early in the investigation at the site as feasible for EPD evaluation and determination if the RRS are appropriate as cleanup standards or if Type 5 RRS will be applicable
  - At least one confirmation soil sample should be collected at the location of the highest detected concentrations of Arochlors and analyzed for the dioxin-like PCB congeners (which are separately listed in Appendix I of the Rules) and regulated polychlorinated dibenzofurans and dibenzodioxins. If said substances are not detected in the sample, EPD will not consider them as COCs for the site.
  - Trademark must provide documentation regarding the past use of the shed on the "undeveloped" portion of the site and must collect and analyze a representative number of surface (0 to 2 ft below ground surface) and subsurface (greater than 2 ft below ground surface) soil samples from a minimum of four locations in the undeveloped portion of the property where debris exists and analyze for site COCs to establish current conditions. EPD also recommended that Trademark characterize "drummed" material stored in the shed, as observed by EPD during the initial site inspection, and dispose of as appropriate.
  - Trademark must provide documentation regarding the use of the "cleared" area in the "undeveloped" area of the Site. This documentation may be a signed and certified statement (e.g., affidavit) by a person with historical knowledge (e.g., former employee, etc. of Rice Iron and Metal), trenching, geophysical survey, and/or soil sampling and analysis as appropriate.
  - Potential points of exposure must be described and shown on a figure in relation to the site boundaries and on cross sections as appropriate. In addition, the relationship of impacted groundwater and producing zones/depths of nearby water supply wells and regional aquitards (if any) should be evaluated in narrative form and depicted on cross sections.
  - Appropriate groundwater (including well purging) and soil sampling procedures and equipment: The most recent progress report indicated the sampling procedures were not consistent with either the "low flow/low stress" (aka traditional multiple volume) purge method or the "Low flow/low volume" (aka tubing-in-screen) purging methods described in current EPA Region 4, SESD standard operating procedures. Furthermore, groundwater sampling for VOCs should be conducted using the straw method when using a peristaltic pump and tubing or bladders (if applicable) that come into contact with groundwater samples should be Teflon® or Teflon®-lined if the resultant analytical data is to be used to demonstrate achievement of contaminant delineation and/or compliance with cleanup standards.

I will prepare a meeting summary for the file and send you a copy with a letter acknowledging the submittal and receipt of the VRP progress reports for the subject site submitted to date after I return to the office; however, further EPD review of the progress reports submitted to date will be deferred until we receive the third progress report for the site, which should address several of the issues discussed during the meeting. If you have any additions or clarifications regarding the above summary, please send them to me via email and I will look at them when I return to the office and include as appropriate in the meeting summary that I will prepare.

I look forward to receiving the third progress report for the site on or before November 22, 2015 and hope that many of the issues discussed during the meeting are addressed as we discussed. Please document your revisions to figures and tables, responses to comments, etc. in response-to-comment format as a separate document submitted at the same time as the referenced Progress Report. I am attaching the WORD file (unsigned) with the May 22, 2014 EPD comments for your convenience.