



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

March 16, 2018

Robert Lewis
Environmental, Safety, and DOT Compliance Manager
Genuine Parts Company
2999 Wildwood Parkway
Atlanta, Georgia 30339

VIA FIRST-CLASS MAIL AND EMAIL

Re: Request for Additional Vapor Intrusion Data
Rayloc Facility, HSI Site Number 10547
Atlanta, Georgia; Fulton County

Dear Mr. Lewis:

The Georgia Environmental Protection Division (EPD) has completed a review of Prospective Purchaser Corrective Action Plan (PPCAP) Annual Progress Report 3, dated December 10, 2015, that was submitted to EPD by Clearwater Environmental for Genuine Parts Company, on behalf of the property owner, LRL Holdings Georgia LLC, under the requirements of the Georgia Brownfields Act, O.C.G.A. 12-8-200. In that report, information was presented on sub-slab soil-vapor samples obtained from beneath six buildings located downgradient of the Rayloc Facility. However, off-property vapor-intrusion (VI) issues fall within the regulatory guidelines of the Voluntary Remediation Program (VRP). Accordingly, we provide the following pursuant to the Georgia VRP Act (the Act), O.C.G.A. 12-8-100:

According to the above-referenced PPCAP annual report, sub-slab soil-vapor samples were obtained from beneath six buildings located hydraulically downgradient of the Rayloc property. The report concludes that no VI hazard is present within any of the buildings. However, EPD requires additional information to evaluate those findings. Specifically, for the six Hartman Geoscience letters provided in Appendix B, please include the following in the next VRP semiannual progress report, due to EPD on April 11, 2018, or under separate cover within 60 days following the date of this letter:

1. A specific source for the US EPA allowed indoor air values (web address, EPA table referenced, table date, etc.)
2. All calculations (a tabulated spreadsheet would be preferable, with accompanying explanations where necessary)
3. A single figure depicting:
 - a. The buildings from which the soil-vapor samples were obtained
 - b. Building identifier labels ("B&D Concrete," etc.)
 - c. Soil-vapor sample IDs, with callouts depicting detected VOC concentrations

4. A detailed description of the sampling protocol
5. A narrative explaining how sampling locations were chosen within each building. Specifically:
 - a. Regarding B&D Concrete soil-gas sample BD-1, why was a warehouse area near a drive-in door chosen instead of an office area, where VI risk would potentially be greater?
 - b. Why was only one sample per building obtained?

Genuine Parts Company and the professional geologist specified in the VIRP are to oversee the implementation of the VIRP in accordance 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 specified schedule and 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) 657-3935.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Jack Wintle, Clearwater Environmental (via email)