

Georgia Department of Natural Resources

2 Martin Luther King Drive, S.E., Suite 1462 East, Atlanta, Georgia 30334

Mark Williams, Commissioner
Environmental Protection Division
Judson H. Turner, Director
Land Protection Branch
404-657-8600

March 12, 2012

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Southern Metal Finishing Company
c/o Mr. James McClatchey, Vice-President-Production Manager
1581 Huber Street
Atlanta, Georgia 30318

FILE COPY

Re: Revised Voluntary Remediation Plan and Application, November 2011
Woodall Creek Site – Southern Metal Finishing Property, **HSI Site No. 10689**
Atlanta, Fulton County, Georgia
Tax Parcel No. 17-0187-LL-059-6

Dear Mr. McClatchey:

The Georgia Environmental Protection Division (EPD) has reviewed the revised November 2011 Voluntary Investigation and Remediation Plan (VIRP) submitted for the subject property pursuant to the Georgia Voluntary Remediation Program Act (VRPA) O.C.G.A. 12-8-100. The VIRP was submitted in accordance with the November 22, 2011 letter from your Technical Director Charles MacPherson. This letter responded to our notice of deficiencies dated October 7, 2011 (NOD), which referenced the original April 2011 VIRP.

Southern Metal Finishing (SMF) is one of seven properties that have been identified as sources contributing to the groundwater contaminant plume that has impacted Woodall Creek. The other properties comprising the Woodall Creek HSI site (HSI No. 10689) include the following parcels: 187-LL-72 and -73, 187-LL-70, 187-LL-69, 188-001-16, 188-001-15, 191-LL-22, 191-LL-42 191-LL-0202 and 191-LL-0210.

The Woodall Creek site was originally listed on the Georgia Hazardous Site Inventory (HSI) because the Director determined that a release of regulated substances from groundwater to a water of the state resulted in exceedances of state water quality standards and it posed a danger to human health and the environment. One of the essential features of corrective action mandates the corrective action shall protect waters of the State from releases that would cause surface water to experience concentrations of regulated substances in excess of any general criterion specified in the Georgia Rules and Regulations for Water Quality Control at 391-3-6-.03(5). According to historical surface water data, Woodall Creek has been out of compliance with Georgia in-stream water quality standards (ISWQS) for tetrachloroethene (PCE) for at least 10 years and continues to be out of compliance.

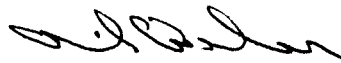
EPD has determined that the VIRP is incomplete because the VIRP does not propose a remediation plan to address the water quality violation of PCE in Woodall Creek. Similarly, the revised corrective action plan (CAP) submitted for the site in December 2011 under Section 391-3-19 of the Rules for Hazardous Site Response is incomplete because it does not propose a remediation plan to address the water quality violation of PCE in Woodall Creek.

In order for EPD to be able to accept the VIRP as being complete, there must be a corrective action plan for the site that includes remediating Woodall Creek or controlling migration of the plume. More aggressive corrective action, including pumping of groundwater to gain hydraulic control and/or stopping migration of contaminants to Woodall Creek, is required. As indicated in our letter dated October 7, 2011 addressing the original April 2011 VIRP, monitored natural attenuation (MNA) can only be considered appropriate if the plume is not expanding, nor threatening downgradient wells or specific water bodies.

EPD is currently reviewing the December 2011 CAP and Charles MacPherson's December 13, 2011 letter responding EPD's October 7, 2011 notice of deficiencies and plans to issue a separate letter outlining further deficiencies.

If you have any questions or need assistance, please contact Larry Kloet at 404-463-7505 or Kristen Ritter Rivera, P.G. of my staff at (404) 657-8663.

Sincerely,



David Brownlee
Acting Program Manager
Response and Remediation Program

c: Charles MacPherson (Peachtree Environmental)
S. Laseter