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November 4, 2020

Mr. John Fonk
Unit Coordinator – Remedial Sites Unit
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive, SE
Suite 1054, East Tower
Atlanta, Georgia 30334

Subject: **RCRA Part B Permit Renewal Application Revised Section F for EPD Review**
Former Xerox Facility, Atlanta, Georgia
EPA I.D. No. GAD010103232

Dear Mr. Fonk:

On behalf of our client, Xerox Corporation, we are submitting for EPD review the attached revised Section F of the RCRA Part B Permit Renewal Application for the former Xerox CRC facility (EPA I.D. No. GAD010103232) located on Fulton Industrial Boulevard in Atlanta, Georgia. This draft Section F has been revised as discussed during our conference call of October 8, 2020. Xerox has reviewed and approved this revised Section F for transmittal to EPD for review.

Please call us if you have any questions concerning this submittal.

Sincerely,

Wood Environment & Infrastructure Solutions, Inc.

John M. Quinn, P.G.
Senior Geologist

A. David Alcott w/permission by D. Plopper
A. David Alcott
Principal

Attachment

cc: Julia Ispentchian – Xerox Corporation
Marcus Lathrop – Xerox Corporation

PART F - PROCEDURES TO PREVENT HAZARDS

F-1 - Waiver Request

F-1.a Security Procedures and Equipment

From 1975 to the early 1980s, a solvent blend was used in parts cleaning conducted in an area just inside the east side of the building. Tanks (2) for the new and used solvent blend were located just outside the southeast corner of the building, with underground piping connecting the tanks to the area of usage. In 1984, following discontinuation of these cleaning operations using solvent blends, the tanks and piping and, to the extent possible, associated contaminated soils were excavated and the excavations backfilled and covered with concrete that was designated the RCRA cap. Active groundwater and 2-PHASE vapor extraction systems were installed and operated until 1998; thereafter, active remediation was discontinued; active remedial system components and most of the facility monitoring wells were abandoned; and groundwater monitoring, in accordance with the approved Contingent Corrective Action Plan (CCAP) implemented in September 1998, was continued at monitoring wells located outside the building. These monitoring wells were constructed with concrete pads and locked steel protective covers. There are no known or suspected areas of surficial contamination or of exposure to contaminated groundwater. Current and planned future corrective actions under this proposed permit consist of monitoring groundwater levels and quality, semi-annual inspection and maintenance (as required) of the RCRA cap and of monitoring well pads and protective covers, and reporting.

Facility employees are present at the site during normal business hours. An after-hour electronic security system monitors for unauthorized entry into the building, alerting facility personnel and/or appropriate authorities if an alarm is activated. During more than 35 years of conducting closure/post-closure activities, there has been no instance of incidental damage or vandalism of the cap or monitoring wells. Individual warning signs are painted at selected locations on the RCRA cap with the legend "RCRA Cap - Do Not Disturb".

F-1.b Waiver

A waiver of the aforementioned requirements of this section is not requested.

F-2 - Inspection Schedule

On a semi-annual basis Xerox contracted personnel, in conjunction with monitoring groundwater elevations and quality, inspect the closed RCRA Cap and monitoring wells. The inspection sheets used during this inspection are provided herein (Appendix F-1.) It is noted that facility employees occupy the site building but are not involved in on-going corrective action activities. Any inspections conducted by facility personnel as part of general building

security and general safety of building occupants are not related to the corrective action program and are not included herein.

F-2.a General Inspection Requirements

Inspection Requirements for Monitoring Equipment

- Instruments used during each sampling event to measure groundwater quality parameters are provided by qualified equipment vendors.

Inspection Requirements for Emergency and Safety Equipment

- Vehicles used by personnel conducting site inspections and sampling activities are supplied with fire extinguishers that are inspected annually and first aid kits that are resupplied as necessary.

Inspection Requirements for Security Devices

- Site monitoring wells and recovery wells are padlocked closed when not being monitored or serviced. Padlocks are inspected during scheduled sampling events. This inspection is documented on the Monitoring Well Inspection Sheet (provided in Appendix F-1).

Inspection Requirements for Operating and Structural Equipment

- The concrete cap covering the former tanks and associated piping areas and the well pads and protective covers are inspected at least semi-annually by Xerox contract personnel. A copy of the Closed RCRA Unit Inspection Log Sheet used is provided in Appendix F-1.

F-2a(1) Types of Problems

Copies of the Monitoring Well Inspection Sheet and the Closed RCRA Unit Inspection Log Sheet are provided in Appendix F-1. The types of problems to be checked are on the inspection sheets

F-2a(2) Frequency of Inspection

The inspection frequency for the various items scheduled for inspection is provided above in Part F-2.

F-2.b Specific Process Inspection Requirements

The Inspection Requirements for the former tanks area have been addressed in Part F-2.

F-2.c Remedial Action

If a problem is identified during inspection, it will be noted on the inspection sheet and the appropriate corrections or repairs will be made. Once the problem is corrected, it will be noted on the inspection sheet or in relevant field notes.

F-2.d Inspection Checklist

Copies of the Monitoring Well Inspection Sheet and the Closed RCRA Unit Inspection Log Sheet are included in Appendix F-1. The completed inspection sheets are stored for at least three years in a dedicated file at the office of Xerox' consultant (Wood Environment & Infrastructure Solutions, Inc.) at 1075 Big Shanty Road NW, Suite 100, Kennesaw, Georgia 30144.

F-3 - Preparedness and Prevention Requirements

Corrective actions, site inspections and groundwater monitoring, are conducted in a manner to minimize the possibility of a fire, explosion, or any release of hazardous constituents to the environment. Groundwater sampling equipment is electrically or battery operated; no fuels are used. When sampling, plastic sheeting is placed around the well to limit potential contact of sampling equipment with the ground. Purged groundwater is containerized on-site prior to disposal off-site at a permitted facility. Demonstration of facility compliance with preparedness and prevention requirements per 40 CFR Part 264 Subpart C, as these requirements relate to the current and planned future groundwater monitoring activities is provided below.

F-3.a Equipment Requirements

The following equipment is carried by contract personnel conducting corrective actions at the facility:

- Communication Equipment – All contract personnel have cell phones.
- Fire Control Equipment - Vehicles used by sampling personnel are outfitted with portable fire extinguishers. Additional portable fire extinguishers and fire hose stations are located throughout the building. Fire hydrants are located on property outside of the site building.
- Sampling personnel have first aid kits.

F-3.b Aisle Space Requirements

- This section is not applicable.

F-4 - Preventative Procedures, Structures and Equipment

- This section is not applicable.

F-5 - Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes

The hazardous constituents potentially contained in the ground water recovered from the monitoring wells or soil that may be excavated from the site are not expected to be ignitable, reactive or incompatible as removed from the site. Therefore the requirements of this section are not applicable.

APPENDIX F-1

FIELD INSPECTION SHEETS

(Monitoring Well Inspection Sheet and the Closed RCRA Unit Inspection Log Sheet)

FORMER XEROX CRC FACILITY, ATLANTA, GA
MONITORING WELL INSPECTION SHEET

INSPECTOR:_____ DATE/TIME:_____
COMPANY:_____ MONITORING WELL NO.:_____

ITEM	YES	NO	COMMENT
1. Well number clearly labeled on well vault or protective metal casing			
2. Metal protective casing or well cap secured with a padlock, and is the lock in good condition			
3. Well vault or metal protective casing free of standing water (dry)			
4. Concrete well apron (pad) in good repair			
5. Well cap present and in good condition			
6. Measuring point for water level clearly marked on top of well casing			
7.Excess vegetation around well pad			
8. Evidence of ponded water around well vault or metal protective cover			
9. Damage to well vault or metal protective cover			
10. Insect infestation in or around the well (e.g.,ants, bees, wasps, etc.)			
11. Static water level (from top of casing) gauged (in feet and hundredths of feet)	X	X	
12. Gauge well depth (from top of casing) (in feet and hundredths of feet)	X	X	
13. Sediment accumulation measured (in feet and hundredths of feet)	X	X	
14. Is there significant variation in well depth between gauged reading and reported depth from well log?			

In the event of a "No" response to questions 1-6 or a "Yes" response to questions 7-10 and 14, modifications and/or re-measurements must be made within 45 days. Please note below any modifications completed as a result of the monitoring well inspection.

Item	Date of Completion of Modification	Signature/Company of Person Completing Modification

FORMER XEROX CRC FACILITY, ATLANTA, GA

Closed RCRA Unit Inspection Log Sheet

Regulated Unit

Item	Potential Problems	Status (A/U)	Condition	Nature of Repairs/ RemedialAction	Date of Repair
Surveyed Benchmarks	Not Present Not Visible				
Final Cover (Concrete)	Subsidence Cracked Caulking Condition				
Erosion Damage	Erosion Damage Ponded Water				
Biological Disturbance	Underslab Burrowing Impact of Insects				
Warning Signs	Missing Damaged Illegible				
Security Fence, Gates, Locks	Corrosion Damage				

Note: A = Acceptable

U =Unacceptable

All sections must be completed for each item inspected. Please make additional comments on the back of the form, as necessary.

Signature

Date