Georgia Department of Natural Resources
Environmental Protection Division-Land Protection Branch
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Judson H. Turner, Director

June 29, 2015

VIA E-MAIL AND REGULAR MAIL

AMC International, Inc.
c/o Ms. Maria Callas
1850 South Cobb Industrial Boulevard
Smyrna, Georgia 30082

Re: Third VRP Progress Report - February 18, 2015
AMC International Site, HSI No. 10405
310 Brookhollow Industrial Boulevard
Dalton, Whitfield County, Georgia

Dear Mr. Callas:

The Georgia Environmental Protection Division (EPD) has reviewed the Third VRP Progress Report dated February 18, 2015. EPD has noted the following concerns that should be addressed in accordance with the Voluntary Remediation Program Act (the Act) in subsequent reporting:

1. EPD concurs that site soils have been vertically and horizontally delineated to Type 1 risk reduction standards (RRS) based on the results from the 2014 soil sampling activities.

2. Based on both the potentiometric map shown in Figure 6 and the groundwater sampling results, further horizontal delineation will be required downgradient of MW-23.

3. Please note that the completion of horizontal delineation downgradient of MW-23 and in bedrock downgradient of the Dobbs GWRS Area is due in the next progress report in accordance with the VRP application checklist. EPD would like to work with AMC's Consultant in attempting to locate a suitable and accessible location for the installation of a bedrock well along Focus Drive, equidistant from DMW-11 and OBG-W1/MW-22D. We are available to meet at the site and assist in the scoping of a potential location at any time.

4. In reviewing the groundwater data for the Dobbs System wells and the downgradient well concentrations it does not appear that the treatment system has "pulled" contamination downgradient and offsite. Per the progress report, the recovery wells are not adequately designed to effectively capture the plume which extends off-property and still not completely delineated. Consequently EPD does not concur with turning off this system and looks forward to further interpretation of contaminant transport in this area based on additional, strategically located wells.

5. From a review of Table 1 – Monitoring Well Construction Details and the Field Forms in Appendix C, EPD noted discrepancies between the well depths and screen intervals (Table 1) and the well depths and subsequent pump placements recorded in the field. The table below highlights some of these discrepancies.

Well ID	Total Depth* (ft bgs)	Total Depth** (ft bgs)	Depth to Water* (ft bgs)	Screen Interval** (ft bgs)	Pump Placement* (ft bgs)
AMW-1	28.70	28.90	21.82	14.75-24.75	25
DMW-1***	54.06	53.70	39.66	45-55	46.5
OBG-W7***	46.87	69	42.05	49-69	44
DMW-9	47.75	65	39.12	45-65	44
AMW-12	45.5	48	28.8	38-48	37
MW-22D	67.82	64.56	29.12	54-64	Not Provided
MW-23	60.19	57.29	30.56	47-57	Not Provided

NOTES: *Recorded in Field; ** Table 1; * High Turbidity**

Based on the table above and the turbidity readings in some of the wells sampled, consideration should be given to redeveloping some wells prior to the next sampling event. In addition, for some of the wells highlighted above, the pumps appear to have been placed too high in the water column. Please review all of the wells sampled to determine if the pump placement relative to screen interval was correct.

6. In reviewing the groundwater data for wells DMW-12 and MW-23, EPD is in general agreement with turning off ARW-2 for a limited period of time as part of the full evaluation of the groundwater treatment system. As noted, the wells would be shut down during the implementation of ISCO. What is not known is when ISCO will be implemented since it is not shown in the milestone schedule. It is anticipated that ISCO will be implemented in the near future (see comment # 8).

7. Please report groundwater results in both tables and figures in the same units as the analytical reports, which appear to be micrograms per liter (ug/L).

8. The reports contain isoconcentration figures for multiple constituents of concern (COCs). The isoconcentration maps provided are inaccurately drawn since they did not account for numerous wells which were not sampled, but have previously had elevated concentrations. Please consider this fact when drawing isoconcentration figures for future reporting. In addition, please make the following changes in future reports:

    a. Separate isoconcentration figures for each of the COCs should be developed for the overburden and the partially weathered bedrock and bedrock.

    b. Please add 1,1-dichloroethene figures for both the overburden and the partially weathered bedrock and bedrock in subsequent reporting.

    c. For the RRS isoconcentration contour and shading, a more distinct color, other than light gray, should be used.

9. EPD concurs with the groundwater investigation going forward focusing and reporting on 1,1,1-TCA, 1,1-DCA, 1,1-DCE, 1,2-DCA, 1,4-dioxane, cis-1,2-DCE, PCE, trans-1,2-DCE, TCE, and vinyl chloride only. However please ensure that full VOC scans are run on all groundwater samples and included in laboratory analytical reports.

10. Comment 14 from EPD's December 8, 2014 comment letter was not addressed in this progress report. Please include surface water trend graphs in subsequent reporting.

11. The project milestone schedule provided in Table 9 does not include any proposed remedial activities, which will occur over the next couple of years. Since the full-scale corrective action design is anticipated to be completed in this period please add these activities to the schedule in the next progress report.

AMC 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 AMC. However, failure of EPD to respond to a submittal within any timeframe does not relieve AMC from complying with the provisions, purposes, standards, and policies of the Act.

EPD anticipates that the plume stability evaluation and full scale ISCO design will be submitted along with the 4th VRP Progress Report no later than August 12, 2015. If you have any questions regarding this matter, please contact Robin Futch, PG of the Response and Remediation Program at 404-657-8686.

Sincerely,

Jason Metzger
Unit Coordinator
Response and Remediation Program

c: Javeed Syed – Apollo Technologies (via e-mail)
Kristen L. Ritter Rivera – EarthCon Consultants, Inc. (via e-mail).

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