

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King, Jr. Dr., Suite 1054 East, Atlanta, Georgia 30334

Office 404/657-8600 Fax 404-657-0807

Judson H. Turner, Director

December 8, 2014

VIA E-MAIL AND REGULAR MAIL

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

FILE COPY

Re: Voluntary Investigation and Remediation Plan Status Reports
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 Voluntary Investigation and Remediation Plan (VIRP) Status Reports dated February 14, 2014 and August 12, 2014, and the Semi-Annual Groundwater Monitoring Report dated September 16, 2013. EPD recognizes that AMC has conducted significant additional investigations of the site over the past year. However, we are concerned that the registered environmental professional/consultant overseeing the project has changed twice since your August 2013 enrollment. The application and first status report presented aggressive schedules to meet the required VIRP five-year compliance schedule, which has since been delayed. EPD has conditionally approved the new consultant's (Earthcon) proposal to conduct a plume stability evaluation; however, we encourage AMC to expeditiously implement the active remedies proposed to reduce significant source area concentrations. In addition, EPD has noted the following concerns that should be addressed in accordance with the Voluntary Remediation Program Act (the Act):

Soils

1. In order to accurately characterize the soils impacted horizontally above regulatory standards, as shown in Figure 3 in the February 14, 2014 VRP Status Report, additional soil sampling should be conducted in the following locations: west of sample location SB-28 and north of SB- 29 and SB-30; and east of SB-33 between SB-35 and OBG-6 (Figures 3 through 9).
2. Section 10.3 of the February 14, 2014 VIRP Status Report summarizes the soil investigation results and states that soil impacts from the batch room fire area appear to be limited to the southwest of the building, from 0 to 20 feet below ground surface (bgs). Although we agree that the deeper detections (30 feet plus) at OBG-5 and OBG-6 are attributable to groundwater fluctuation, we do not agree that the soil impacts from 20 to 25 feet depicted on Figure 8 are attributable to groundwater (also note that OBG-7 should have been included in the highlighted area of exceedences on that figure). A more accurate summary is that soil impacts extend beneath the south end of the building and to the south and east of the building, from the surface down to groundwater.

In accordance with the VIRP checklist, complete soil delineation to Type 1 RRS should have been demonstrated in the August 2014 report. Although, delineation may be complete, the report did not document it. In the next report, please include appropriate

figures, which include new and historical soil data, to demonstrate delineation of soil impacts for all COCs.

Groundwater and Surface Water

3. Based on the lineations shown in Figure 10 of the February 2014 report, the following bedrock wells should be installed:
 - a. One lineation runs parallel to the TCA plume centerline in the vicinity of the Dobbs system -- a well should be installed in bedrock in the vicinity of OBG-W1.
 - b. One lineation runs parallel to Focus Drive in the vicinity of DMW-11-- a well should be installed in bedrock on the east side of the road, equidistant from DMW-11 and OBG-W1.
4. The August 2014 VIRP Status Report, Table 2, demonstrates that VOCs are continuing to impact the east stream, indicating ongoing plume movement to the east. Earthcon has informed EPD that AMC no longer plans to expand the pump and treat system near the stream. Please note that AMC must ensure that the In-Stream Water Quality Standards are met within the approved 5 year schedule in accordance with the Act.
5. As indicated in Tables 5 and 6 of the February 2014 VIRP Status Report, effluent from both the Dobbs and Arcadis GWR System Air Strippers contained significant VOC concentrations, with a 1,1,1-TCA concentration of 2500 ug/L in the Dobbs effluent and a PCE concentration of 2100 ug/L in the Arcadis effluent. According to the report, these discharge to an infiltration gallery and to the sanitary sewer, respectively. Although the issue appears to be addressed by the subsequent sampling event, this has been an ongoing issue as identified in Comments 15 and 16 of EPD's May 27, 2011 letter. AMC must take appropriate measures to ensure that groundwater is properly treated prior to release to the infiltration gallery or sanitary sewer. In the next report, please identify the location of the infiltration gallery on a figure and provide the discharge limit for the sanitary sewer.
6. Section 6.3 of the August 2014 report noted reduced performance of the Arcadis carbon vapor treatment and proposed that it be changed out. In the next report, please confirm whether this occurred. Additionally, please clarify the frequency of carbon change outs and the criteria used to determine when required. Furthermore, analytical data was not submitted for the vapor samples pre/post carbon from the Dobbs system air stripper; please explain why this data is no longer being reported.
7. All of the groundwater samples were reportedly collected as low flow samples. However, the location of the pumps relative to the screened interval during purging was not reported in the field sampling logs for the majority of the wells sampled. For the low-flow purging method, the pump intake should be placed near the mid-point of the screened interval (see Groundwater Sampling, USEPA SESDPROC-301-R3, Section 3.2.2).
8. When the low-flow purge method is used, the USEPA SESD standard operating procedure, Groundwater Sampling (SESDPROC-301-R3), requires that the water level in the well be monitored so that it can be confirmed that drawdown is "slight and stable" to insure that the water being produced from the well is from the formation. During the June 2014 sampling event, the water levels during purging in wells DMW-1, 2, 5, and 6 exceeded drawdown greater than 0.33 feet. It was noted that the sampling log for DMW-5

showed the water level during pumping going from 37.11 ft to 50.34 ft to 38.8 ft. This was likely a recording error. Please reduce pump speed so as to limit drawdown to less than 0.33 feet in future sampling events.

9. The turbidity readings for a number of the wells had not stabilized with respect to turbidity when the samples were collected. Stability criteria require that turbidity be less than 10 NTUs. Continue purging until stability is achieved before taking the sample, in accordance with SESDPROC-301-R3.
10. Consideration should be given to a change in the usage of the 'term mixed' well for wells installed at the overburden/bedrock interface. A more descriptive term might be partially weathered bedrock.

General

11. Table 4 of the August 2014 report contains the following incorrect risk reduction standards. Please use the correct values as provided below in future reports: 1,1,2-trichloroethane - 5 ug/L; methylene chloride - 450 ug/L; toluene - 5200 ug/L.
12. In future semi-annual groundwater monitoring reports, updated cross sections with current data for both soils and groundwater should be provided. No updated cross sections have been provided since the VIRP application in April 2013 and additional data has been developed since that time for both soils and groundwater.
13. Please provide a table of all monitoring well construction details, including date of installation, screen length, etc., for all new and existing wells in each progress report.
14. In future reports please include trend graphs for the impacted surface water samples. Please note that AMC does not need to submit graphs for the chemicals of concern and monitoring wells that have met the applicable risk reduction standards (RRS).
15. The reports contain isoconcentration figures for multiple constituents of concern. Please note the following suggestions for future figures:
 - a. Isoconcentration figures showing total volatile organic compound concentrations are not generally that informative and do not need to be prepared.
 - b. Isoconcentration contours should be drawn based on actual data as solid lines where data points exist and dashed lines where interpretations are made.
 - c. The relevant RRS should be posted in the figure's legend.
 - d. Compounds where all sample results are below reporting limits or compounds with only one detection do not need to be shown in a figure.
16. In the September 2013 Semi-Annual Groundwater Monitoring Report, the potentiometric elevation for DMW-11 should read 718.41 rather than 781.41. In reviewing this figure, the outlier elevation should have been noted and corrected.

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.

Please address the above concerns and submit along with the In-Situ Chemical Oxidation (ISCO) performance monitoring results in the next VRP Status Report, due February 12, 2015. Based on discussions with Earthcon, EPD anticipates that the plume stability evaluation and full scale ISCO design will be submitted no later than the subsequent report, due August 12, 2015. If you have any questions, please contact Montague M^cPherson of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Jason Metzger
Unit Coordinator
Response and Remediation Program

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

File: HSI# 10405
S:\RDRIVE\MONTMC\HSI\AMC International\VRP Status Reports 13, 14.doc