

**SEVENTH SEMIANNUAL VRP PROGRESS REPORT
FOR THE
DAVIDSON-KENNEDY COMPANY FACILITY
1195 VICTORY DRIVE
ATLANTA, FULTON COUNTY, GEORGIA**

HSI # 10866

**DOCUMENT PREPARED FOR:
DAVIDSON KENNEDY COMPANY
5273 REDFIELD ROAD
DUNWOODY, GEORGIA 30338**

**DOCUMENT SUBMITTED TO:
GEORGIA DEPARTMENT OF NATURAL RESOURCES
2 MARTIN LUTHER KING, JR. DRIVE, SE, SUITE 1154
ATLANTA, GEORGIA 30334**

DOCUMENT PREPARED BY:



**PEACHTREE ENVIRONMENTAL
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DECEMBER 2014

THE INFORMATION CONTAINED IN THIS REPORT TITLED
"SEVENTH SEMIANNUAL VRP PROGRESS REPORT
FOR THE
DAVIDSON-KENNEDY COMPANY FACILITY
ATLANTA, FULTON COUNTY, GEORGIA"

HSI#10866

IS INTENDED FOR THE
USE OF DAVIDSON-KENNEDY COMPANY, THEIR OFFICERS
AND DESIGNEES
AND THE
GEORGIA DEPARTMENT OF NATURAL RESOURCES

Project No. 3185

DOCUMENT PREPARED BY:



Steven W. Hart, P.G., *SENIOR PROJECT MANAGER*

DOCUMENT REVIEWED BY:

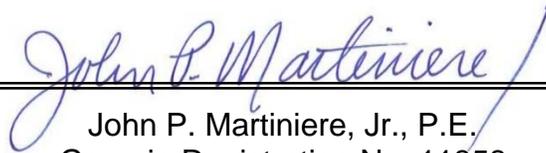


John P. Martiniere, Jr., P.E., *PROJECT DIRECTOR*

DECEMBER 2014

CERTIFICATION

"I certify that I am a qualified groundwater scientist who has received a baccalaureate or post graduate degree in the natural sciences or engineering, and have sufficient training and experience in groundwater hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport. I further certify that this report was prepared by me or by a subordinate working under my direction."



John P. Martiniere, Jr., P.E.
Georgia Registration No. 11858

A monthly summary of Professional Engineer/Geologist hours expended as part of the initial application and this Semiannual VRP Progress Report is included as **Attachment A**.



Peachtree Environmental
3000 Northwoods Parkway, Suite 105
Norcross, Georgia 30071
770-449-6100 / fax 770-449-6119

December 29, 2014

Mr. John Maddox
Georgia Environmental Protection Division
Hazardous Waste Management Branch
2 Martin Luther King, Jr. Drive SE
Atlanta, GA 30308

Dear Mr. Maddox:

This letter summarizes the major activities since the 6th Semi-annual Progress Report submitted in June 2014. Some of these activities will be discussed in more detail at a meeting already scheduled with EPD for mid-January and in some cases decisions will be made at that meeting re the items below. Therefore, many of the activities described below are overviews at this time.

1. Off –site access for remediation – Permission has been obtained for soil removal on a parcel adjacent to the Davidson-Kennedy (D-K) property. The land owner, Ms. Tracy Dummett, has granted her permission via e-mail to conduct removal operations, or anything else needed, on her property. The current tenant, Mr. Carlton Gordon, has likewise expressed his approval for site access to perform removal operations or to use as access to the lower sections of the D-K property.
2. Revised excavation plan – Peachtree has discovered additional usable data for near surface lead samples that has allowed a more robust Kriging effort to determine what contaminated areas must be removed to provide area averaging results which meet Risk Reduction Standards. The Kriging operation, and subsequent resulting removal volumes, will be reviewed with EPD at the January 2014 meeting.
3. Sampling operations – Peachtree personnel mobilized to the site on September 9, 2014 to take four additional samples in a specific area where data were lacking. These samples were analyzed for lead to provide additional data to be utilized for the Kriging exercise.

4. City of Atlanta Permit for construction Activity – At D-K’s direction, Peachtree initiated discussions with the City of Atlanta after the original Corrective Action Plan (CAP) was submitted to EPD to obtain a City of Atlanta permit to perform excavation operations. The initial discussions were held, and some of the drawings and other paperwork prepared, using the Kriging results presented in the June 30, 2014 Semi-annual Progress Report. When the additional data were discovered, permitting activities were suspended pending EPD review and approval of revised excavation plans. These activities will be resumed once a CAP for the site based on revised Kriging results has been reviewed and approved for the Site by EPD.
5. Environmental Covenant - A redrafted environmental covenant, revised per EPD’s comments, will be submitted no later than at the meeting with EPD in late January.
6. Preliminary Risk Evaluation (PRE) - Peachtree performed sediment and surface water sampling at the D-K Facility located at 1195 Victory Drive in Atlanta, Fulton County, Georgia (the “Property”). The sampling was conducted as part of the Ecological Preliminary Risk Evaluation (PRE) described in a letter from Peachtree to the Georgia Environmental Protection Division (EPD), dated June 3, 2014. The samples were collected by Peachtree personnel, Ms. Virginia Mauldin-Kinney and Mr. Brad White, on December 1, 2014. The samples were collected in general accordance with the U.S. Environmental Protection Agency (EPA) Region 4 Science and Ecosystem Support Division (SESD) Operating Procedures for Surface Water Sampling, dated February 28, 2013, and Sediment Sampling, dated August 21, 2014.

The locations for the surface water and sediment samples were selected and named in accordance with the samples collected by Kemron Environmental Services (Kemron) on August 27, 2007. Please be advised, the EPD collected surface water and sediment samples from the same locations at the Property simultaneously with Kemron in 2007 and used the same naming system; however, the locations of the samples collected by the EPD were inconsistently reported in subsequent documentation and, therefore, the Kemron sample locations are considered to be more reliable. Further, based on the uncertainty surrounding the EPD sample locations, Peachtree believes that any comparisons between the results of Peachtree’s recent surface water and sediment samples should only be made to the results of Kemron’s previous sampling. Peachtree’s sample locations are depicted on **Figure 1**, which is included as **Attachment B**.

The samples were collected and placed into clean laboratory-provided containers and immediately placed on ice and transported to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia under chain of custody. The sampling parameters for the surface water and sediment samples were based on the sampling parameters used by Kemron and the EPD in 2007, and included the following:

- Metals – arsenic, barium, cadmium, chromium, copper (surface water only), lead, mercury, selenium, silver, and zinc (surface water only) by EPA Methods 7470C and 6010C; and
- Semi-volatile organic compounds (SVOCs) by EPA Method 8270D.

The laboratory analytical results of the surface water samples collected by Peachtree are summarized in **Table 1** below along with the analytical results of the surface water samples collected by Kemron in 2007 for comparison.

Table 1: Surface Water Results Davidson-Kennedy Company Facility						
Sample ID	Metals				SVOCs	
	Peachtree (12/1/2014)		Kemron (8/27/2007)		Peachtree (12/1/2014)	Kemron (8/27/2007)
DK-3	Barium	100	Barium	84.6	BRL	BRL
	All other metals	BRL	All other metals	BRL		
DK-4	Barium	77.7	Barium	57.8	BRL	BRL
	Copper	11.7	All other metals	BRL		
	Zinc	75.2				
	All other metals	BRL				
DK-5	Barium	73.3	Barium	58.1	BRL	BRL
	Zinc	57.2	All other metals	BRL		
	All other metals	BRL				

Notes:
 All surface water results are reported in micrograms per liter (µg/L).
 BRL – below reporting limit
 Kemron did not analyze for copper and zinc in 2007.

The laboratory analytical results of the sediment samples collected by Peachtree are summarized in **Table 2** below along with the analytical results of the sediment samples collected by Kemron in 2007 for comparison.

Table 2: Sediment Results Davidson-Kennedy Company Facility							
Sample ID	Metals				SVOCs		
	Peachtree (12/1/2014)		Kemron (8/27/2007)		Peachtree (12/1/2014)		Kemron (8/27/2007)
DK-3	Barium	34.5	Barium	34.8	Benz(a)anthracene	0.77	BRL
	Chromium	16.6	Chromium	33.8	Benzo(a)pyrene	0.51	
	Lead	16.3	Lead	61.3	Benzo(b)fluoranthene	0.68	
	All other metals	BRL	All other metals	BRL	Chrysene	0.73	
					Fluoranthene	1.8	
					Phenanthrene	1.6	
					Pyrene	1.3	
All other SVOCs	BRL						
DK-4	Barium	12.4	Barium	36.2	BRL	BRL	
	Chromium	12.0	Chromium	42.6			
	Lead	10.3	Lead	63.2			
	All other metals	BRL	All other metals	BRL			
DK-5	Barium	41.0	Barium	35.1	Benz(a)anthracene	0.57	BRL
	Chromium	19.0	Chromium	23.8	Benzo(a)pyrene	0.49	
	Lead	36.2	Lead	37.9	Benzo(b)fluoranthene	0.70	
	All other metals	BRL	All other metals	BRL	Chrysene	0.67	
					Fluoranthene	1.7	
					Phenanthrene	0.82	
					Pyrene	1.3	
All other SVOCs	BRL						
Notes: All sediment results are reported in milligrams per kilogram (mg/kg). BRL – below reporting limit							

Conclusions to be drawn from these stream and sediment data will be discussed at the meeting with EPD in late January.

Please contact the undersigned if you have any questions or comments regarding the information presented in this letter.

Sincerely,

PEACHTREE ENVIRONMENTAL


Steven W. Hart, P.G.
Senior Project Manager


John P. Martiniere, Jr., P.E.
Project Director

Attachments:

Attachment A – Professional Engineer Hours

Attachment B – Sample Location Plan



ATTACHMENT A

PROFESSIONAL HOURS

Davidson-Kennedy Company Facility
Atlanta, Fulton County, Georgia

ATTACHMENT A
MONTHLY SUMMARY AND DESCRIPTION OF PROFESSIONAL HOURS

Quantity	Units	Time Period + Description of Activities	Hours	
				Subtotal
<i>July 1 to July 31, 2014</i>				
PE Oversight / Project Management				
5.00	Hours	Project Director (John P. Martiniere, P.E.)		5.00
<i>August 1 to August 31, 2014</i>				
6.00	Hours	Project Director (John P. Martiniere, P.E.)		6.00
<i>September 1 to September 30, 2014</i>				
7.00	Hours	Project Director (John P. Martiniere, P.E.)		7.00
<i>October 1 to October 31, 2014</i>				
24.00	Hours	Project Director (John P. Martiniere, P.E.)		24.00
<i>November 1 to November 30, 2014</i>				
3.50	Hours	Project Director (John P. Martiniere, P.E.)		3.50
<i>December 1 to December 31, 2014</i>				
13.50	Hours	Project Director (John P. Martiniere, P.E.)		13.50

PE MONTHLY HOURS TOTAL => 59.00



ATTACHMENT B

SAMPLE LOCATIONS

