

Georgia Department of Natural Resources

Environmental Protection Division

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Judson H. Turner, Director

Land Protection Branch

Phone: 404/657-8600 FAX: 404/657-0807

April 6, 2015

Hillshire Brands Company and Rathon Corporation
c/o Mr. Harvey M. Sheldon, Esq.
Hinshaw & Culbertson
222 North LaSalle Street, Suite 300
Chicago, Illinois 60601

VIA FIRST CLASS MAIL AND EMAIL

COPY

Re: EPD Comments
VRP Semiannual Reports of December 2013, June 2014, and December 2014
Diversey-Olympic Manufacturing (Former), HSI Site No. 10435
3051 Olympic Industrial Drive, Smyrna, Georgia; Cobb County

Dear Mr. Sheldon:

The Georgia Environmental Protection Division (EPD) has completed its review of the above-referenced documents pertaining to the Diversey-Olympic Manufacturing (Former) HSI site. Our comments are provided below.

1. EPD will require horizontal delineation of groundwater contamination on the warehouse property southwest of the site, at 3021 Olympic Industrial Drive. A previously existing monitoring well, installed by others southwest of the warehouse building, may be used for delineation in lieu of additional well installations, provided the warehouse owner grants access.

We continue to maintain that historical operations at the Diversey facility are the likely source of contaminants in warehouse-property groundwater at MW-9a and MW-9b, although we acknowledge that the transport mechanism is unclear. Given the apparent presence of a groundwater divide between the Diversey and warehouse properties, groundwater flows across the warehouse property to the southwest, necessitating additional delineation in that direction.
2. Due to the historical presence of groundwater contaminants above their respective residential risk reduction standards on the warehouse property at 3021 Olympic Industrial Drive, at the MW-9 well grouping, an environmental covenant restricting groundwater usage on that property will be required.
3. Due to its location downgradient of the site and upgradient of impacted wells, the Wesley Properties parcel is going to need an environmental covenant restricting groundwater usage on that property. If Wesley Properties refuses to enter the VRP as a qualifying property, or otherwise refuses to enter into a covenant, then the HSRA rules would apply. Under HSRA, the Diversey RP would ask for access to install wells and to possibly implement remedial activities on the Wesley property. If Wesley were to refuse to cooperate, EPD would send them a letter asking for cooperation under HSRA. If cooperation was still not forthcoming, then EPD would likely issue a CSR call-in letter to Wesley.
4. An environmental covenant restricting groundwater usage on the CSX railway parcel will not be necessary. A letter to EPD from the Georgia State Properties Commission, dated March 3, 2015, will suffice in lieu of a covenant. A copy of that letter has been provided to Brown & Caldwell via email.

5. Regarding Table 2-2, Final Cleanup Standards, in the June 2014 report, the Type 1 soil RRS for 1,1-dichloroethane should be 400 milligrams per kilogram, pursuant to Comment 1a in our November 25, 2013, comment letter.
6. Please include the depth to the pump intake on every groundwater-sampling log. Also, EPD noticed several instances in which the pump intake was listed on a groundwater-sampling log as being at the bottom of the water column. When using the traditional multi-volume purge method, the pump intake should be positioned at the top of the water column and slowly lowered as the water column lowers, until the pumping rate and recharge rate reach equilibrium. When using the micro-purge method, the pump intake should be positioned midway in the screened interval, with a preferred pumping rate of 0.5 liters per minute or less and minimal drawdown. For more information, refer to the USEPA Region 4 groundwater sampling operating procedures (OPs), "Procedure SESDPROC-301-R3, Groundwater Sampling," effective March 6, 2013. The OPs can be accessed on the Internet at <http://www.epa.gov/region4/sesd/fbqstp>.
7. The most recent chlorobenzene concentration of 150 ug/L in MW-11 is above the delineation standard of 100 ug/L for that substance. Based upon recent analytical history, chlorobenzene concentrations in MW-11 are greater when groundwater elevations are relatively low. EPD acknowledges that chlorobenzene concentrations in that well have fluctuated above and below the delineation standard. Accordingly, we will not require additional delineation at this time. However, if volatile organic compound concentrations in MW-11 increase, an additional delineation well may become necessary.
8. Contrary to what is stated in the last paragraph of Section 4.2 in the December 2014 report, constituents of concern (COC) were detected in monitoring well MW-6 during the October 2014 groundwater-sampling event. COCs detected in that well include chlorobenzene, ethylbenzene, and xylenes.

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

If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Trish Reifenberger, Brown & Caldwell (via email)
Karl Forrest, Fine & Block for Jodaco, Inc. (via email)

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