

Georgia Department of Natural Resources
Environmental Protection Division

2 Martin Luther King Jr. Drive, Suite 1054, Atlanta, Georgia 30334
Judson H. Turner, Director
(404) 656-4713; Fax. (404) 651-9425

June 18, 2015

VIA EMAIL & REGULAR MAIL

Mr. Rob Savarese
Chemtrade Solutions LLC
6300 Philadelphia Pike
Claymont, Delaware 19703

Re: January 2015 VRP Semi-Annual Progress Report
General Chemical Site, HSI# 10498
East Point, Georgia
Tax Parcel ID #s 14 013100010176 & 14 013100010184

Dear Mr. Savarese:

The Georgia Environmental Protection Division (EPD) has received the January 27, 2015, "Response to Comments" and the January 2015 Semi-Annual Groundwater Monitoring Report #13, which constitutes as the Voluntary Remediation Program (VRP) 4th Semi-Annual Progress Report, that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by GeoSyntec on behalf of Chemtrade Solutions LLC (Chemtrade). After completing its review of these document submittals, and based on the discussions held during a May 21, 2015, meeting between EPD and site representatives, EPD has prepared the following comments:

- 1) According to the January 2015 Response to Comments, Chemtrade plans to sample the onsite groundwater well GWC-03 to address the concerns associated with the impacts identified at the previous boring location DB-04 (Comment 2). EPD recommends that the shallow well, GWC-03S be sampled rather than the deeper GWC-03D.
- 2) In accordance with the discussions held during the above referenced meeting, please ensure that the remedial action work plan to be completed for the site, noted in the January 2015 Response to Comments, includes utilization of an institutional control in the form of a Uniform Environmental Covenant (UEC). The UEC should address any involvement of the City of East Point in future site related corrective action activities, including details associated with the continued monitoring and maintenance of the planned storm sewer slip lining remedy.
- 3) It was noted both during the above referenced meeting and in the VRP Report that historic property information and data from a past boring on the property immediately upgradient of the site indicate the presence of a former acid pit that may be potentially acting as a source of groundwater and surface water impacts upstream/upgradient of the site. Please note that EPD will contact the upgradient property owner in order to confirm any potential release to soil/groundwater/surface water.
- 4) Please ensure that future VRP Progress Reports include a comparison of site data to the applicable Type 1/4 risk reduction standards/clean-up criteria. A figure should also be included to illustrate the concentrations within groundwater/surface water and the lateral extent of the area exceeding the compliance criteria.

- 5) EPD concurs with the request to revise the submittal dates for the Semi-annual VRP Progress Report from April/October to January/July. The next VRP Progress Report will be due July 10, 2015.

The above comments must be addressed 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 Chemtrade. However, failure of EPD to respond to a submittal within any timeframe does not relieve Chemtrade from complying with the provisions, purposes, standards, and policies of the Act. Please note that these comments pertain only to the progress report and not to the proposed remedial plan discussed during the May meeting, as that corrective action plan has not been formally submitted to EPD.

Should you have any additional questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 657-8660.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Bobby Triesch, Newell Recycling, LLC
Eyaad Odeh, Chemtrade (PDF email)
Brian Jacobson, Geosyntec (PDF email)

File: VRP Application 887983819 – General Chemical Site #10498