

**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

February 15, 2016

**VIA EMAIL & REGULAR MAIL**

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

Re: July 2015 & January 2016 VRP Progress Reports  
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 following documents, 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):

- July 13, 2015, "Response to Comments"
- July 2015 Semi-Annual Groundwater Monitoring Report No. 14 (VRP Progress Report 5)
- January 2016 Semi-Annual Groundwater Monitoring Report No. 15 (VRP Progress Report 6)

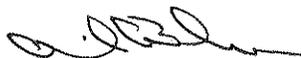
After completing its review of these document submittals, EPD has prepared the following comments:

- 1) EPD previously recommended that GWC-03S be sampled rather than the deeper GWC-03D to address the concerns associated with the impacts identified at the previous boring location DB-04. While EPD will not require further sampling and analysis at the GWC-03S location for the potential offsite constituents of concern, EPD requests that this monitoring well continue to be gauged with an oil/water interface probe during future monitoring events.
- 2) EPD has no objections to Chemtrade preparing separate Uniform Environmental Covenants (UEC) for the separate parcels associated with the site's corrective measures. Please note that even though a restrictive covenant may already be in place for the parcel now owned by Newell, a new UEC in accordance with the Uniform Environmental Covenant Act will have to be executed as part of the VRP corrective action.
- 3) EPD is continuing efforts to contact the upgradient property owner in order to confirm any potential release to soil/groundwater/surface water (see attached).
- 4) The July 2015 VRP Progress Report included additional storm drain sampling and assessment activities, which included a proposal to excavate and sample the SW-07AA location and attempt to locate an upstream source of impact. Please ensure that the July 2016 VRP Progress Report includes the results of this additional proposed storm water assessment activity.

- 5) The January 2016 VRP Progress Report did not include an update regarding the progress associated with implementing the proposed VRP Remediation Plan to address the surface water exposure pathway (i.e., slip line the storm water drains or perform any necessary repairs to prevent groundwater from entering the storm drain system). Please provide EPD with a status update and updated schedule for the site related corrective measures.
- 6) Please include an updated cost estimate for the remaining corrective measures that are to be completed at the site, and update the associated financial assurance mechanism as necessary.

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. Please include the responses to the above listed comments in the next Semi-Annual VRP Progress Report, scheduled for submittal by no later than July 10, 2016. 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

Attachment:

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

File: VRP Application 887983819 – General Chemical Site #10498

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