

# **Georgia Department of Natural Resources**

## **Land Protection Branch-Environmental Protection Division**

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

Judson H. Turner, Director

Phone: (404) 657/8600 Fax (404) 657/0807

May 8, 2015

### **VIA E-MAIL AND REGULAR MAIL**

OmniSource Athens Division, LLC  
c/o Brian Winters, Corporate Environmental Manager  
7575 West Jefferson Boulevard  
Fort Wayne, Indiana 46806

Re: Voluntary Remediation Progress Report and Application, March 12, 2015  
The Loef Company Property, HSI Site No. 10376,  
590 Old Hull Road, Athens, Clark County, Georgia  
Tax Parcels 221 00C, 221 001, and 162 037, VRP #802705980

Dear Mr. Winters:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Progress Report and Application (Progress Report) dated March 12, 2015, which was submitted for the subject tax parcels (the "Property") pursuant to the Georgia Voluntary Remediation Program Act (the Act). As you know, Hull Real Estate, LLC (Hull Real Estate) submitted a Voluntary Investigation and Remediation Plan (VIRP) dated November 7, 2011 and was accepted as an applicant in the Voluntary Remediation Program (VRP) on May 3, 2012. Hull Real Estate informed EPD in a letter dated January 6, 2014 that it was not able to continue with remediation at the subject Property. OmniSource Athens Division, LLC (OmniSource) has elected to pursue regulatory closure of the Property under the VRP. Therefore, EPD accepts OmniSource as a participant in the VRP as defined in the Act for the subject Property, provided that OmniSource resumes implementation of Hull Real Estate's approved VIRP and adheres to the conditions that were specified in EPD's May 3, 2012 acceptance letter and the revised schedule provided in Attachment 6 of the subject Progress Report. EPD appreciates OmniSource's cooperation with continuing remediation at the Property and offers the following comments:

1. EPD provided comments on the Hull Real Estate, LLC VIRP and 1<sup>st</sup> and 2<sup>nd</sup> Progress Reports in letters dated May 3, 2012 and April 4, 2014, respectively. The comments outline the deficiencies that must be addressed and requirements that must be met prior to EPD's approval of the final compliance status report (CSR). Please ensure that the subject comments and any previous outstanding comments are addressed in future progress reports and/ or the CSR.
2. EPD agrees with the proposal to abandon MW-2A, as the well was damaged and had to be replaced a number of times due to its proximity to an area used for placement of large piles of crushed cars and metal. However, prior to decommissioning MW-2A, please sample it to document plume conditions relative to the newly installed deep well. EPD also agrees with the plan to repair, sample, and include MW-1 in future sampling events. Please ensure that MW-2A and MW-1, if it is irreparable, are properly abandoned in accordance with Section 2.8.1 (*Decommissioning Procedures*) of SESD Guidance Document #SESD-PROC-101-R1 (*December 29, 2013*). Any monitoring wells that are abandoned should be included on future property figures and identified as former monitoring well locations.
3. The Progress Report describes the construction and placement of one shallow and one deep monitoring well to define the horizontal and vertical extent of contamination at the

Property. Upon further discussion with EPD personnel, please note the following modifications:

- a. As requested by EPD, OmniSource has agreed to install a deep well to address vertical delineation requirements in a location that is in the apparent *downgradient* direction of wells MW-2A and MW-11 as depicted in revised Figure 5 (provided by Apex via email to EPD on April 30, 2015). The proposed location is acceptable to EPD. OmniSource proposes that the well be installed using a hollow stem auger drilling rig to a depth where auger refusal is encountered or a maximum depth of 75-feet below ground surface (bgs), and the well will be constructed with a 5-foot section of screen in accordance with procedures outlined in the subject Progress Report. Given the unknown features of Property geology below 35' bgs, EPD will rely on the professional judgment of the professional geologist or engineer for the proper placement and installation of the monitoring well.
  - b. Based on the groundwater data and revised potentiometric surface map provided in the subject Progress Report, EPD agrees that delineation of the horizontal groundwater plume is complete at the Property.
4. In general, the information provided on the Well Purging-Field Water Quality Measurements Forms is not sufficient to allow EPD to determine whether purging and sampling were performed in accordance with EPA Operating Procedure SESDPROC-301-R3 (March 4, 2013). Some of the field information was provided inconsistently or was omitted from the forms. Therefore, the following information should be added to existing information on field sampling records, as necessary depending on the purging procedure employed: a description of the method used to purge the well and specific method by which the final water samples were withdrawn from the wells (i.e. peristaltic pump and "straw method" for VOC samples, etc.), volume of water in the well, a sample calculation of a single well purge volume, the purge rate, and the depth to the top and bottom of the screen.
  5. The Progress Report did not provide a monthly summary of hours invoiced with a description of services provided. Please ensure that the information is provided in future reports.
  6. EPD approves the Schedule of VRP Activities proposed in Attachment 6 of the Progress Report; however, please note that failure of EPD to respond to a submittal within any timeframe does not relieve OmniSource from complying with the specified schedule and the provisions, purposes, standards and policies of the Act.

Please address the subject comments in the next Semiannual Progress Report due July 31, 2015, or the final CSR due May 1, 2017, as appropriate. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at (404) 657-0487.

Sincerely,



Charles D. Williams  
Program Manager  
Response and Remediation Program

c: Apex Companies, LLC, Kathleen Roush, PG  
Arnall Golden Gregory, LLP, John Spinrad