

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch
2 Martin Luther King, Jr. Dr., Suite 1054 East, Atlanta, Georgia 30334
(404) 657-8600; Fax (404) 657-0807
Judson H. Turner, Director

May 16, 2014

FILE COPY

VIA E-MAIL AND REGULAR MAIL

Metalplate Galvanizing Corp.
c/o Mr. Adam Brown
500 Selig Drive
Atlanta, Georgia 30336

RE: Proposed Consent Order
Voluntary Investigation and Remediation Plan Schedule Extension
VRP Sixth Semi-Annual Progress Report
Metalplate Galvanizing Facility, HSI # 10204
Atlanta, Fulton County, Georgia

Dear Mr. Brown:

The Georgia Environmental Protection Division (EPD) has received your response to our November 8, 2013 comment letter for the above-referenced site. We appreciate your comments and your agreement with the proposed revisions to the draft schedule. As you know, the Director has established a standard and policy that properties enrolled in the Voluntary Remediation Program (VRP) be in compliance with cleanup standards within five (5) years of enrollment. Therefore, EPD is issuing the enclosed proposed Consent Order, which is required to enable your continued participation in the VRP under an extended schedule for corrective action at the site. We are also providing the following comments in response to your December 18, 2013 letter and the VRP Sixth Semi-Annual Progress Report, dated February 18, 2014:

1. Metalplate Comment #1 – EPD concurs that a field visit to review the potential location and need for a replacement well may be useful in the future pending the results of the surface water, sediment, and groundwater data scheduled to be collected. After this new data is collected and analyzed in the context of an accurate potentiometric map, further discussion regarding the data from MW-3 would be appropriate.
2. Metalplate Comment #2 – EPD concurs with the proposed course of action for sediment characterization.
3. Metalplate Comment #3 - Please collect groundwater elevation data from all existing wells on-site in order to construct a more comprehensive potentiometric map of the site during each event. Although not optimal, EPD concurs that MW-2 may be used as a proxy for Selig Pond elevation data. In addition to the surface water elevation points proposed, please install staff gauges at the final location of SW-4 and in the lower west ditch northwest of SW-204. Please refer to the May 18, 2011 SLERA, Figure 2.2 - Surface Water Sampling Locations Map for the referenced sample point.

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4. Metalplate Comment #6 – Please relocate proposed surface water sampling point SW-4 to the east, near SW-104. In addition, if surface water is present during monitoring events, please sample the lower west ditch northwest of SW-204 and the middle ditch near SW-5. See Figure 2.2 of the above-referenced SLERA for referenced sample points.
5. EPD concurs that vertical delineation of groundwater impacts has been satisfied under Sections 12-8-107(g)(2) and 12-8-108(9) of the VRP Act.

Please sign the enclosed Consent Order and return it to this office no later than June 30, 2014. Upon receipt of the signed Consent Order, EPD will issue a public notice providing for a thirty (30) day comment period pursuant to Chapter 391-1-3-.01, "Public Participation in Enforcement of Environmental Statutes," prior to the execution of the Consent Order. Once the public comment period has expired, EPD will forward a copy of the executed Consent Order to you. In the interim, please continue to implement corrective action in accordance with the draft schedule.

If you have any questions or concerns, please contact Montague M^cPherson of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Jeffrey W. Cown, Chief
Land Protection Branch

c: Frances Carpenter, Non-Point Source Program, WPB (w/o enclosure)

Encl: Proposed Consent Order

File: HSI # 10204, Metalplate Galvanizing Corp.

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