

# Georgia Department of Natural Resources

## Land Protection Branch-Environmental Protection Division

2 Martin Luther King Junior Dr., Suite 1054 East, Atlanta, Georgia 30334

Judson H. Turner, Director

404/657-8600

September 12, 2014

### VIA EMAIL AND REGULAR MAIL

Georgia World Congress Center Authority  
c/o Wayne Rosser, Maintenance/Physical Plant Manager  
285 Andrew Young International Blvd., NW  
Atlanta, Georgia 30313-1591

**COPY**

Re: Quarterly Groundwater Gauging and Limited Sampling Report  
Annual Groundwater Sampling Report #8  
Five Year Monitoring and Maintenance Review Report  
Landfill Maintenance and Inspection Reports, Quarters #36 - #41  
Northside Drive Landfill, HSI No. 10222  
457 Northside Drive, Tax Parcel No. 14-82-6-12-1  
Atlanta, Fulton County, Georgia

Dear Mr. Rosser:

EPD has reviewed the subject Quarterly Groundwater Gauging and Limited Sampling Report dated August 8, 2014, Five-Year Monitoring and Maintenance Review Report (FYRR) and Annual Groundwater Sampling Report #8 (February 14, 2014), Landfill Maintenance and Inspection Reports for Quarters 36/37 (August 14, 2013), Quarters 38/39 (February 14, 2014), and Quarters 40/41 (August 1, 2014) for the above referenced site. The documents were submitted by Tetra Tech on behalf of the Georgia World Congress Center Authority (GWCC) as required by the Monitoring and Maintenance Plan for Type 5 Risk Reduction Standards-Northside Drive Landfill, Atlanta, Georgia, December 2003, Revised July 2005 (M&M Plan). EPD appreciates the work by GWCC and Tetra Tech to ensure the landfill cap perforations were properly sealed and the continued thorough monitoring of the engineering controls. EPD has the following comments:

### **Annual and Quarterly Groundwater Sampling Reports**

1. EPD appreciates the voluntary measures taken by the GWCC with respect to the investigation of increasing PAH concentrations at MM-03 and MWC-1A during the past year. Based on the data presented in the Quarterly Groundwater Gauging and Limited Sampling Report (Quarterly Report), GWCC may discontinue the quarterly sampling and gauging activities, as the concentrations of PAHs detected in MM-03 and MWC-1A were generally orders of magnitude below the applicable Type I risk reduction standards (RRS). While the report did not provide enough detail for EPD to definitively concur that the PAH detections at MM-03 and MWC-1A are from an offsite source; it does appear that the slurry wall and engineered cap remain intact based on the groundwater elevations measured in the dewatering well. EPD recommends continued annual monitoring of the wells at this time, but GWCC may recommend changes in sample frequency based on future analytical results.
2. For future groundwater sampling events, EPD approves the use of low flow/low stress sampling techniques for MWC-1B and MWC-1C. Sampling procedures are to be conducted in accordance with Section 3.2.2, *Groundwater Sampling*, of SESD-PROC-301-R3 or the latest SESD protocols. If this method is chosen, please ensure that the guidance is closely followed including placement of the intake point in the approximate mid-portion of the screened interval and assurance that minimal drawdown occurs.

3. The analytical data sheets were not provided in the Quarterly Report to substantiate the data from quarterly sampling events conducted on September 23, 2013, March 27, 2014 and June 30, 2014, but the December 11, 2013 analytical data sheets were provided in Annual Report #8. Please submit the outstanding analytical data sheets in the next annual report.
4. It appears that Figure 5A of the Quarterly Report shows data for MM-03 rather than MWC-1A, as indicated in the title. Also, the concentration of fluoranthene (0.638 mg/L) detected at MM-03 on December 11, 2013 was omitted from Figure 5A.

### General

5. The subject site is certified to Type 5 RRS. The statement made in Section 4.0 of Annual Report #8 and Section 6.0 of the FYRR that groundwater concentrations shall not exceed background or detection limits pursuant to Section 391-3-19-.07(6) of the Rules is partially incorrect. The referenced Rule refers to criteria for meeting Type 1 RRS in groundwater. Section 3.1 of the M&M Plan specifies the use of Type 1 RRS for groundwater at the subject site beyond the Type 5 boundary. Those RRS were derived in accordance with the Rules for Hazardous Site Response (Rules), and are either (1) the concentrations given in *Table I of Appendix III* of the Rules or (2) *the background or detection limit of those regulated substances that are not listed therein*. This distinction is recognized in other sections of the reports, but the statement should be corrected in future reports to avoid the impression that a standard has been exceeded.
6. The Quarterly Report noted that the depth to groundwater was not recorded for MM-04 during the June 2014 sampling event, without explanation. Additionally, the cover letter for the Quarters 36/37 Landfill Maintenance and Inspection Report mentions the repair of the monitoring well lid at MM-04 in July 2014; however, details regarding the nature and extent of the damage and repairs were not included in the report. Any observed damage to the monitoring well should have been recorded in the field notebook and on Maintenance Record Forms as required by Section 4.3.1 of the M&M Plan. Please ensure that future damage to any component of the site engineering controls, concrete cap, and groundwater monitoring network are properly recorded and addressed pursuant to Section 4 of the M&M Plan.

Please address the comments listed above in the next annual or semiannual report, as appropriate, which are due by February 15, 2015. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at (404) 657-0487.

Sincerely,



Jason Metzger  
Unit Coordinator  
Response and Remediation Program

c: Wayne Rosser, Georgia World Congress Center Authority  
Andy Kandray, Tetra Tech  
Joan Sasine, Bryan Cave