

# 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

February 4, 2016

### VIA E-MAIL AND REGULAR MAIL

Rathon Corporation  
c/o Mr. Michael J. Glade, P.E.  
Vice President  
P.O. Box 4030, Suite 400  
Golden, Colorado 80401

The Hillshire Brands Company  
c/o Mr. Kent B. Magill, Esq.  
Executive Vice President  
400 South Jefferson Street  
Chicago, Illinois 60607

Re: Voluntary Remediation Program Semi-Annual Status Report, August 31, 2015  
Former Oxford Chemical Property (Rathon), Sublisted to HSI Site No. 10072  
5001 Peachtree Blvd, Chamblee, DeKalb County, Georgia  
Tax Parcel 18-278-14-002

Dear Messrs. Glade and Magill:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program (VRP) Semi-Annual Status Report for the former Oxford Chemical Site dated August 31, 2015. EPD has considered the conclusions and recommendations of the Report as well as the discussions from the meeting held at EPD offices on September 2, 2015. Our comments are summarized below.

1. The fate and transport model documentation and results for both chlorinated ethenes and chlorinated benzenes is a valid representation of site conditions and potential future conditions related to the plume and downgradient surface water. EPD approves the modeling inputs used as well as the modeling conclusions.
2. Issues with groundwater sampling were again noted. It appears that turbidity was not assessed so could not have been considered for stabilization. It was unclear if pump intake was placed at the mid-point of the screened interval, as per EPA low-flow sampling guidance SESDPROC-301-R3. Please ensure that this and other applicable procedures are uniformly adhered to and accurately reported on sampling logs.

The above listed comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD concurs that all potential exposure pathways have been adequately addressed under the VRP, upon recording of the Environmental Covenant (EC) referred to in the report. As your next progress report, due February 28, 2016, please submit a scheduled for recording the EC and submittal of the VRP CSR. The CSR should include a proposed groundwater monitoring program in accordance with Section 12-8-10 (g)(2) of the Act or a justification for no further monitoring, as the environmental professional. Should you have any additional questions or concerns please contact Robin Futch, P.G. at (404) 657-8686.

Sincerely,



Robin Futch, P.G.  
Acting Unit Coordinator  
Response and Remediation Program

c: Leonard J. Diprima, P.G., United Consulting, Inc.  
File: 218-0244

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