



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

4244 International Parkway
Suite 104
Atlanta, Georgia 30354
404-362-2537

August 4, 2017

Mr. Todd Darrough
QuikTrip Corporation
4705 South 129th East Avenue
Tulsa, OK 74134-7008

SUBJECT: Corrective Action Plan (CAP)-Part B
No Further Action Required:
QuikTrip Store No. 713
1611 Austell Road
Marietta, Cobb County, GA
Facility ID: 9033029*13

Dear Mr. Darrough:

The Georgia Underground Storage Tank Management Program (USTMP) received correspondence from Genesis Project, Inc., dated July 27, 2017, that forwarded a properly certified CAP-Part B Monitoring Only Report (#15).

Based on current requirements of the Georgia Underground Storage Tank Act, the Georgia Rules for Underground Storage Tank Management (GUST Rules) and the data submitted, the USTMP has determined that **no further action is required for the referenced release.**

However, further corrective action may be required if mandated through more stringent State or Federal statutory or regulatory changes. Additional measures may also be required if existing or future drinking water systems or surface water bodies within two miles of the site are impacted by any dissolved contamination resulting from this release, or if previously unidentified soil contamination, dissolved contamination or free product is identified as originating from this site.

Please submit a Completion Report and Certification, documenting that the associated monitoring wells have been properly abandoned, by **September 30, 2017**. If you have any questions, please contact me at (404) 362-4529.

Sincerely,

William E. Logan
Advanced Geologist
Corrective Action Unit II

WEL:

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cc: Matthew H. McDuffie, P.G., Genesis Project, Inc.

Lon Revall, GA EPD

File (CA): COBB, 9033029

The next groundwater gauging and sampling event to be conducted in March 2017 with the report submitted by May 31, 2017.

April 21, 2017, the EPD received the Semi-Annual Monitoring Report #14, dated April 18, 2017, for the time period December 14, 2016 through March 3, 2017. Site activities consisted of groundwater gauging and sampling event were conducted on March 3, 2017.

Monitoring:

- Nearest down gradient receptor is an unnamed tributary of Nickajack Creek at 400 feet southeast of the site.
- Groundwater Depth-to-water on the site ranged 28.26 / 29.34 / 25.71 / 24.84 / 25.34 / 27.42 / 23.99 / 25.86 / 24.17 feet in MW-2 to 34.83 / 34.98 feet in MW-8. A slight increase in the water table of 0.36 feet.
- Groundwater elevations have increased from the previous gauging event. MW-2: 1,085.20 / 1,084.12 / 1,087.75 / 1,088.62 feet to 1,086.07 / 1,085.41 feet in MW-3.
- Groundwater flow direction to northwest. Directions are fluctuating due to depth of water.
- Hydraulic gradient of 0.001.
- Free product was not detected.
- The highest benzene concentration was 6,420 / 1,250 for MW-10 with MW-10 at 2,100 / 2,290 µg/L.
- Seven out ten groundwater samples were above the ISWQS (51 µg/L for Benzene).
- Contamination concentrations are not indicative of free product at this time.
- The latest site ranking score is 550

O&M

- A 13-day High Vacuum Dual Phase Extraction event (February 23, 2015 thru March 10, 2015) was conducted. Monitoring wells MW-1, MW-10 and MW-11 were used as extraction wells
- Total FP (Vapor & Liquid): An estimated 931.95 equivalent gallons were recovered with a total of 46,900 gallons of impacted fluids. EPD impressed with performance of mobile HVDP system.
- To date a total # 3 HVE events have been performed (Dec 2012 to December 2015). A cumulative total of 1109 gallons of free product.

The next groundwater gauging and sampling event to be conducted in June 2017 with the report submitted by August 31, 2017.

August 1, 2017, the EPD received the Semi-Annual Monitoring Report #15, dated July 27, 2017, for the time period March 3, 2017 through June 23, 2017. Site activities consisted of groundwater gauging and sampling event were conducted on June 23, 2017.

Monitoring:

- Nearest down gradient receptor is an unnamed tributary of Nickajack Creek at greater than 500 feet southeast of the site and Olley Creek at 2,100 feet northeast.
- Groundwater Depth-to-water on the site ranged 26.92 / 28.26 / 29.34 / 25.71 / 24.84 / 25.34 / 27.42 / 23.99 / 25.86 / 24.17 feet in MW-2 to 33.76 / 34.83 / 34.98 feet in MW-8. An increase in the water table of 1.08 feet.
- Groundwater elevations have increased from the previous gauging event. MW-7 at 1,086.40 / 1,085.39 feet to 1,087.12 / 1,086.07 / 1,085.41 feet in MW-3.
- Groundwater flow direction to northwest. Directions are fluctuating due to depth of water.
- Hydraulic gradient of 0.004.
- Free product was not detected.
- The highest benzene concentration was MW-10 at 2,770 / 2,100 / 2,290 with MW-9 at 2,700 / 6,420 / 1,250 µg/L.
- Seven out ten groundwater samples were above the ISWQS (51 µg/L for Benzene).
- Contamination concentrations are not indicative of free product at this time.
- The latest site ranking score is 550

O&M

- Total FP (Vapor & Liquid): An estimated 931.95 equivalent gallons were recovered with a total of 46,900 gallons of impacted fluids. EPD impressed with performance of mobile HVDP system.
- To date a total # 3 HVE events have been performed (Dec 2012 to December 2015). A cumulative total of 1109 gallons of free product.

The Consultant recommends and GAEPD concurs that NFAR status be recommended on the following; the removal of the USTs and the ancillary equipment, no measurable free product observed since September 5, 2012, decreasing trend in BTEX concentrations over the time period of cleanup, site conditions are such that natural attenuation should occur and breakdown of the BTEX constituents should occur. It is unlikely that to an impact to offsite surface water receptors.

Benzene and Free Product levels detected in current and previous sampling events are summarized below (µg/L): WD-Well Destroyed

Well	Jun 2017	Mar 2017	Dec 2016	Mar 2016	Dec 2015	June 2015	Mar 2015	Dec 2014	Jun 2014	Dec 2013	Jun 2013	Dec 2012	Sep 2012	Jun 2012
MW-1	2450	1820	1120	2000	1890	2440	2800	5,300	7500	7300	8300	4400	10000	9800
MW-2	<1	<1	2	<1.0	<5	<1.0	<1	2	<1.0	DRY	<1.0	10	37	49
MW-3	9	27	46	16	55	30	74	74	81	130	200	210	200	330
MW-4	118	105	64	110	138	133	89	170	74	180	78	100	68	190

MW-5	785	811	823	1600	1460	1,310	1600	1,700	990	1200	2000	3000	2700	2900
MW-6	WD	WD	WD	WD	WD	WD	WD	4,900	4500	4800	4000	3800	3500	3600
MW-7	1070	818	1110	NSA	1080	1220	1200	1,600	1200	1400	1600	2000	1600	1600
MW-8	47	38	26	73	8	18	2	79	170	130	97	49	84	
MW-9	2700	6420	1250	1000	1690	1310	3900	2,000	1300	2200	2600	7700	4800	
MW-10	2770	2100	2290	4500	3150	4290	2800	4,600	2600	4800	1600	1600	1700	
MW-11	619	459	371	1100	901	1570	1700	2,300	2000					

Consultant's Address:

Matthew H. McDuffie, P.G.
 Genesis Project, Inc.
 1258 Concord Road
 Smyrna, GA 30080