

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 7, 2014

VIA ELECTRONIC AND REGULAR MAIL

Ashland, Inc.
c/o Mr. Mike Dever
5200 Blazer Parkway, Suite DA-5
Dublin, Ohio 43017

Re: Voluntary Remediation Program Semi-Annual Progress Report # 3 – December 27, 2013
Voluntary Remediation Program Semi-Annual Progress Report # 2 – June 28, 2013
Voluntary Remediation Program Semi-Annual Progress Report # 1 – December 27, 2012
Evaluation of the Applicability of PCE WQS and Proposed Alternative Approach – June 19, 2012
Tara Shopping Center, HSI Site No. 10798
8564 Tara Boulevard, Jonesboro, Georgia (Clayton County)
Tax Parcel ID 13242D B001

Dear Mr. Dever:

The Georgia Environmental Protection Division (EPD) has reviewed the above referenced documents which were submitted for the Tara Shopping Center site in accordance with the Voluntary Remediation Program Act (the Act). EPD offers the following comments which should be addressed pursuant to the Act.

1. All Semi-Annual progress reports are to include certification by the professional engineer/geologist as specified in the Voluntary Investigation and Remediation Plan (VIRP) checklist.
2. Groundwater contamination is known to exist on several abutting properties. It was noted in the December 27, 2012 report that these affected properties are not currently included as qualifying properties under the VIRP. EPD understands that Ashland will further evaluate these properties following completion of groundwater delineation. Please provide an update on your consideration of these as qualifying properties in the next Semi-Annual Progress Report.
3. EPD's Watershed Planning and Monitoring Program has reviewed Ashland's proposed alternative surface water value for tetrachloroethene (PCE) of 62.2 µg/L as discussed in the "Evaluation of the Applicability of PCE WQS and a Proposed Alternative Approach – Technical White Paper" received on June 19, 2012. Their determination is that the proposed alternative surface water value for PCE is currently not applicable to the project. Their reasons include the following:
 - a. Georgia defines waters of the State as any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, wetlands, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the

boundaries of the State which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation. Consequently, the stretch of the unnamed tributary where PCE has been detected is considered waters of the State;

- b. While the scientific basis for revising the water quality standard to 62.2 µg/L for PCE is correct based on the updated cancer slope factor, EPD would only adopt these revised criteria after EPA has published revised water quality criteria for PCE and the methodology used to derive the criteria have been vetted through the public review process and published in the Federal Register; and
- c. The use of mixing zones is extremely limited in Georgia and usually only considered in the case of point source discharges. All efforts should be made to improve the stream's water quality by not allowing a mixing zone where there is an objectionable pollution condition.

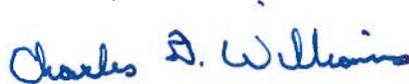
At this time, the remedial criteria for surface water impacts will be the current Georgia In Stream Water Quality Standards (ISWQS) as provided in Section 391-3-6-.03(5) of the Georgia Water Quality Control Act. Surface water monitoring should continue in order to evaluate the effects of the source area corrective action with the goal to meet ISWQS that are applicable at the time of the submittal of the Compliance Status Report (CSR).

4. The reports do not state which specific Region 4 EPA Science and Ecosystem Support Division (SESD) guidance was followed for the groundwater sampling procedures. Groundwater sampling should be conducted in accordance with operating procedure No. SESDPROC-301-R3 (Groundwater Sampling) which was revised on March 4, 2013.
5. The June 28, 2013 progress report noted that the utility easement along Fayetteville Road had to be removed from the ISS area due to an existing gas line. Please include a figure in the remedial implementation completion report demarcating that area and any other areas not included in the ISS treatment area, where soil concentrations exceed Type 1 through 4 risk reduction standards. To ensure that figure is complete, please address Comment 10 of EPD's January 12, 2012 VIRP comment letter in the completion report. These areas should be specifically addressed in the proposed Uniform Environmental Covenant to protect utility/construction workers.
6. The first Semi-Annual Progress Report includes a single figure showing all historical soil boring locations, including the soil data collected by Peachtree Environmental, Inc. (between 2007 – 2008), as requested. However, a revised soil analytical summary table listing all historical soil data results, including the soil data from the 2007 – 2008 Tara Retail soil sampling events has not been provided as requested in the June 28, 2012 correspondence from EPD. Please include the table in the ISS remedial implementation completion report.
7. Potentiometric maps should be prepared for the groundwater elevations recorded in May 2013 for all subsurface units (Table 1 of the June 28, 2013 report).

Ashland must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, and standards of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Ashland. However, failure of EPD to respond to a submittal within any timeframe does not relieve Ashland from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Ashland fail to comply with the approved schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program.

EPD anticipates receipt of the next Semi-Annual Progress Report no later than June 28, 2014. If you have any questions regarding this matter, please contact Robin Futch, PG, PMP at 404-657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Eric Nathan, Tara Retail Holdings, Inc. (via electronic mail)
Michelle Stayrook, EHS Support (via electronic mail)

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