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Land Protection Branch

APR 7 2017

Hazardous Waste

April 5, 2017

Mr. David Brownlee Georgia Department of Natural Resources 2 Martin Luther King Jr. Dr. Suite 1462 East Atlanta, Georgia 30334-9000

Re:

Addendum to VRP Application Former Trent Tube Facility Carrollton, Georgia HSI No. 10604

Dear Mr. Brownlee,

On behalf of BTR Properties LLC (BTR), the current owner of property located at 141 Hammond Street in Carrollton, Georgia, Peachtree Environmental (Peachtree) is pleased to submit this Addendum to the December 19, 2016 Voluntary Remediation Program (VRP) Application for the former Trent Tube site. The site is listed on the Hazardous Site Inventory (HSI) as Site No. 10604.

The VRP Application included a Voluntary Investigation and Remediation Plan (VIRP) for the former Trent Tube site that documented compliance of soil on the BTR property with Type 3 risk reduction standards (RRS) and soil on the adjacent Lawrence property with Type 1 RRS. The soil RRS were calculated in accordance with the HSRA rules and were previously approved by the Georgia Environmental Protection Division (EPD) as a part of the prior Brownfields Compliance Status Report (CSR). Following implementation of Environmental Covenants on both the BTR and Lawrence properties prohibiting the use of onsite groundwater as a drinking-water source, groundwater on both properties will meet the Type 5 RRS.

As the VIRP documented compliance with the RRS for soil and groundwater, no further investigation or corrective action, other than implementation of the Environmental Covenants, was proposed, and the VIRP effectively served as the VRP CSR for the site. The purpose of this Addendum is to provide the attached Certification of Compliance and to request that the VIRP, along with this Addendum, be recognized by Georgia EPD as the VRP CSR for the former Trent Tube site (HSI No. 10604).

Thank you in advance for your consideration of the Addendum. Please let us know if you have any questions or comments.

Sincerely,

Steven W. Hart, P.G. Senior Project Manager John P. Martiniere, P.E.

Project Director

CERTIFICATION OF COMPLIANCE

I certify under penalty of law that this report and all attachments were prepared under my direction in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Based on my review of the findings of this report with respect to the risk reduction standards of the Rules for Hazardous Site Response, Rule 391-3-19-.07, I have determined that soil on the BTR Properties LLC property (Carroll County Parcel CO2 0430003) is in compliance with Type 3 risk reduction standards, soil on the Lawrence Properties, Inc. property (Carroll County Parcel CO2 0430015) is in compliance with the Type 1 risk reduction standard, and groundwater at both properties meets the Type 5 risk reduction standard.

Todd Rambo

BTR Properties, LLC