

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334

Reply To:

Response and Remediation Program
2 Martin Luther King, Jr. Drive, S.E.
Suite 1462, East Tower
Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

Mark Williams, Commissioner
Environmental Protection Division
Judson H. Turner, Director
Land Protection Branch
Mark Smith, Branch Chief

February 17, 2012

VIA E-MAIL AND REGULAR MAIL**COPY**

Bible Baptist Church, Inc.
c/o Mr. Alan Tanner
4700 Skidaway Road
Savannah, Georgia 31404

Re: Voluntary Investigation and Remediation Plan and Application, October 27, 2011
Martha's Dry Cleaners, HSI Site No. 10764
4608 Skidaway Road, Savannah, Chatham County
Tax Parcel: 2-0120-01-004

Dear Mr. Tanner:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated October 27, 2011 submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). The VIRP was submitted in lieu of a corrective action plan required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced property. EPD is approving your voluntary investigation and remediation plan, which specifies corrective action consisting of the following:

- Designation of a point of exposure (POE) and appropriate fate and transport modeling of impacted groundwater.
- Groundwater monitoring to demonstrate all exposure pathways have been assessed and that natural attenuation is occurring.
- Execution of a Uniform Environmental Covenant (UEC) to restrict exposure to contaminated media.

Therefore, EPD is accepting Bible Baptist Church, Inc. (BBC) as a participant as defined in the Voluntary Remediation Program Act for the following qualifying property, provided BBC implements the VIRP in compliance with the following schedule and conditions:

Qualifying property:

4608 Skidaway Road
Savannah, Chatham County, Georgia
Tax Parcel 2-0120-01-004

Within six months of detecting regulated substance(s) on a non-qualifying property, the participant must apply to EPD to include the affected property as a qualifying property under the Act or notify EPD the non-qualifying property is not included under the Act.

Schedule:

- Semiannual progress reports are to be submitted to EPD. Each progress report must describe all actions taken since the last submittal, and include certification by the professional engineer/geologist specified in the VIRP along with a monthly summary of hours invoiced and description of services provided since the last submittal.

- August 17 and February 17 through August 17, 2016.

In addition to the information required above, the following must be included in the specific progress reports discussed below.

- February 17, 2013 semiannual progress report must demonstrate complete horizontal delineation on the qualifying property:
 - February 17, 2014 semiannual progress report must demonstrate complete horizontal delineation on all impacted properties; and,
 - August 17, 2014 semiannual progress report must demonstrate complete horizontal and vertical delineation, finalize the remediation plan and provide a cost estimate for implementation of remediation and associated continuing actions. EPD recommends that the participant finalize approval of cleanup standards for all regulated substances prior to this submittal.
- Compliance status report including certifications:
 - February 17, 2017

Conditions:

1. EPD requests the submittal of a cost estimate for full implementation of the VIRP through CSR submittal and a financial assurance instrument in that amount by no later than April 17, 2012. Model financial assurance instruments can be located at <http://www.gaepd.org/Files/PDF/forms/hwb/HSIModel.pdf>.
2. BBC must address EPD's comment letter dated February 17, 2012 and any other comment letter addressing the investigation and remediation pursuant to the Act to the satisfaction of the Director that it is consistent with the provisions, purposes, standards and policies of the Act.
3. Within ninety (90) days of BBC's notice to withdraw from the Voluntary Remediation Program or termination by the Director pursuant to §12-8-107(d) of the Act, the responsible parties must submit a Corrective Action Plan that complies with the requirements of the Hazardous Site Response Act and associated Rules for Hazardous Site Response.
4. BBC must pay all outstanding fees within sixty (60) days of receipt of an invoice for any costs to the division in reviewing the application or subsequent document that exceeds the initial application fee.
5. Because BBC is performing corrective action at the qualifying property in accordance with an approved voluntary remediation plan, EPD is hereby reclassifying it from Class I to Class V and designating it as needing corrective action as provided for in §12-8-107(b) of the Act.

EPD requires that BBC and the professional engineer/geologist specified in the VIRP oversee the implementation of the VIRP in accordance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by BBC. However, failure of EPD to respond to a submittal within any timeframe does not relieve BBC from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should BBC fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program.

EPD's approval of the VIRP extends only to those technical aspects of the document that expressly require EPD approval under applicable rules and statutes. This approval is not an endorsement by EPD that it accepts as conclusive any representations made in the document. Nor does EPD guarantee or warrant that the document is free of errors or omissions. EPD may later withdraw approval of this document, in whole or in part, if EPD determines that withdrawal is necessary to ensure compliance with the applicable rules and statutes.

If you have any questions, please contact Greg Gilmore at (404) 657-8600.

Sincerely,



David Brownlee
Acting Program Manager
Response and Remediation Program

✓ c: William S. Anderson, III, PE, Terracon Consultants Inc.

File: HSI 10764

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