



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

June 1, 2017

Central of Georgia Railroad Company
c/o Mr. Steven Aufdenkampe
1200 Peachtree Street
Atlanta, GA 30309

Re: HSI Site Number: 10933
E Cohn Property (Former)
Tax Parcel ID #s 020 008 003 and 020 008 004,
and 020 004 001 and 020 004 002
Columbus, Muscogee County

Dear Mr. Aufdenkampe:

The Environmental Protection Division (EPD) has received the September 12, 2016 Voluntary Remediation Program Application (the Application) for the E Cohn Property (Former) facility, in Columbus, Muscogee County, pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. §12-8-100, *et seq.* EPD acknowledges this Application was submitted in lieu of a Corrective Action Plan (CAP) and Compliance Status Report required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced property. EPD is approving your Application, which proposes corrective action consisting of the following:

- Installation of an engineered cap augmented by a removal action, as necessary.
- Further investigation of soils to fully delineate contamination present at the site.

Therefore, EPD is accepting Central of Georgia Railroad Company (COG Railroad) as a participant as defined in the Act for the following qualifying properties provided COG Railroad implements the Voluntary Investigation and Remediation Plan (VIRP) contained in the Application in compliance with the Act, the schedule, and the EPD comment letter dated June 1, 2017.

Qualifying Property(s):

Site Property: E Cohn Property (Former)
Owner: COG Railroad
E Cohn Property (Former)
Columbus, Muscogee County, GA 30303
Tax Parcel ID #s 020 008 003 and 020 008 004,
and 020 004 001 and 020 004 002

Within six (6) 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 that the non-qualifying property is not included under the Act.

Voluntary Remediation Program Application
HSI # 10933, E Cohn Property (Former)]
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Since COG Railroad is performing corrective action at the qualifying property in accordance with an approved Application, the qualifying property will be classified as a Class V site and designated as needing corrective action as provided for in §12-8-107(b) of the Act. Within 45 days of this letter, you are required to file an affidavit, if not previously filed, stating that your property has been listed on the state's hazardous site inventory and has been designated as needing corrective action due to the presence of hazardous wastes, hazardous constituents, or hazardous substances regulated under state law. This affidavit is to be filed with the clerk of the Superior Court of Muscogee County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20. COG Railroad must also place the notice, or revise previous notices recorded, as required by the Rules at Chapter 391-3-19-08(1)(a), in any warranty deed, mortgage, security deed, lease, rental agreement, or other instrument that is thereafter given or caused to be given by the property owner which creates an interest in or grants a use of the property.

Within 30 days of recording the affidavit or revised affidavit, please send a copy of the receipt of the recorded affidavit to the Response and Remediation Program, Georgia Environmental Protection Division, 2 Martin Luther King Jr. Drive, SE, Suite 1054 East, Atlanta, GA 30334.

EPD requires that COG Railroad and the professional engineer/geologist specified in the Application oversee the implementation of the Voluntary Remediation Plan 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 COG Railroad. However, failure of EPD to respond to a submittal within any timeframe does not COG Railroad from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should COG Railroad fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program.

EPD anticipates receipt of the first semi-annual progress report by December 1, 2017 and a Compliance Status Report (CSR), including certification of compliance with applicable RRS, on or before June 1, 2022. Should you have any questions or concerns regarding this site, please contact Mr. David Brownlee of the Response and Remediation Program at (404) 657-8690.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

cc: John Jolly, AMEC Foster Wheeler <john.jolly@amecfw.com>

File: VRP – E Cohn Property (Former) # 10933