

# Georgia Department of Natural Resources

## Environmental Protection Division

2 Martin Luther King, Jr. Dr., SE, Suite 1154, Atlanta, Georgia 30334-9000

Judson H. Turner, Director

Land Protection Branch

Keith M. Bentley, Branch Chief

### Reply To:

Response and Remediation Program

2 Martin Luther King Jr. Dr., S.E.

Suite 1462, East Tower

Atlanta, Georgia 30334-9000

Office 404/657-8600 Fax 404/657-0807

March 15, 2013

### VIA E-MAIL AND U.S. MAIL

HERCULES INCORPORATED

c/o Timothy D. Hassett, Project Manager

500 Hercules Road

Wilmington, DE 19808-1599

Re: Voluntary Investigation and Remediation Plan (VIRP)/Voluntary Remediation Program (VRP) Application and Electronically Submitted Revised Tables (March 20-28, 2013)

Hercules Incorporated, Savannah Plant, HSI Site No. 10696

3000 Louisville Road, Savannah, Chatham County, Georgia 31415

(Tax Parcel Nos. 2-0734-01-001 and 2-0734-03-001)

Dear Mr. Hassett:

The Georgia Environmental Protection Division (EPD) has reviewed the April 9, 2012 Voluntary Investigation and Remediation Plan (VIRP)/VRP application submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) for the subject property, which is listed on the Georgia Hazardous Sites Inventory as HSI 10696. The VIRP was submitted in lieu of a revised Corrective Action Plan (CAP) pursuant to the Georgia Hazardous Site Response Rules (the Rules).

EPD is approving your VIRP/VRP Application, which specifies corrective action consisting of the following:

- Confirmatory groundwater sampling and analysis for regulated substances previously detected at the site.
- Determination of impacted aquifer hydraulic conductivity based on additional field testing.
- Soil confirmation sampling to determine compliance status of pesticides, dioxins, furans, and/or polychlorinated biphenyls (PCBs) in soil samples composited from samples collected from up to seven separate locations at the site.
- Investigation of additional potential source areas to identify the presence or absence of releases of regulated substances to soil;
- Additional site investigation(s) to establish the horizontal delineation of regulated, or soon to be regulated, substances in soil that exceed approved Type 1 RRS;
- Sampling and analysis of sediment and surface water in Dundee Canal for regulated substances previously detected and determination of background conditions and cleanup standards for sediments and surface water, as necessary based on human health and ecological risk assessment evaluations. Specific remedial actions for said media will be proposed subsequent to completion of the risk assessments as necessary.

- Groundwater contaminant fate and transport modeling to determine compliance status with site-specific groundwater cleanup standards at a downgradient point of exposure.
- Vapor intrusion and human exposure evaluation for potential indoor accumulation of vapors from the presence of regulated substances in soil and/or groundwater at the site.
- Implementation of engineering and institutional controls which will include implementation of an environmental covenant that conforms with O.C.G.A. §44-16-1, *et seq*, the Georgia Uniform Environmental Covenants Act for the qualifying properties, with a corresponding deed notice, restricting the future uses of the qualifying property for the purpose of certifying compliance with groundwater site-specific cleanup standards [O.C.G.A. §12-8-107(h) of the Act].
- Implementation of a monitoring and maintenance program to maintain engineering controls, specifically a concrete cap, for asbestos-containing materials (ACMs) located in soil within a former landfill area and implementation of an environmental covenant that conforms with O.C.G.A. §44-16-1, *et seq*, the Georgia Uniform Environmental Covenants Act for said area for the purpose of certifying compliance with soil site-specific ACM cleanup standards [O.C.G.A. §12-8-107(h) of the Act]. Additional remedial actions for site soils determined not to be in compliance with applicable Type 1 through Type 4 RRS discovered and delineated during soil investigative activities referenced above will be addressed as needed subsequent to said investigations.
- Implementation of a semi-annual groundwater monitoring plan until compliance with final cleanup standards is demonstrated for a period of two years or as to be determined by EPD.

Therefore, EPD is accepting HERCULES INCORPORATED (HERCULES) as a participant as defined in the Voluntary Remediation Program Act for the following qualifying properties provided HERCULES implements the VIRP in compliance with the following schedule and conditions:

**Qualifying properties:**

3000 Louisville Road  
Savannah, Chatham County, Georgia  
Tax Parcel Nos. 2-0734-01-001 and 2-0734-03-001

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.

Since HERCULES is performing corrective action at the qualifying properties in accordance with an approved VIRP, the qualifying properties will be reclassified from Class II to Class V 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 Chatham County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20.

HERCULES must also place the following notice, or revise previous notices recorded pursuant to the Georgia Hazardous Site Response Rules, Chapter 391-3-19, in any deed, mortgage, deed to secure debt, lease, rental agreement or other instrument given or caused to be given by the property owner which creates an interest in or grants a use of the property:

"This 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. Contact the property owner or the Georgia Environmental Protection Division for further information concerning this property. This notice is provided in compliance with the Georgia Hazardous Site Response Act and the Voluntary Remediation Program Act."

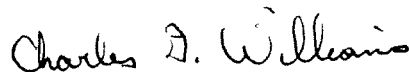
Within 30 days of recording, the affidavit or revision to affidavit, please send a copy of the receipt of the recorded affidavit to the Response and Remediation Program, Georgia Environmental Protection Division, 2 Martin Luther King Jr. Drive, SE, Suite 1462, Atlanta, GA 30334.

HERCULES and the professional engineer/geologist specified in the VIRP are to 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 HERCULES. However, failure of EPD to respond to a submittal within any timeframe does not relieve HERCULES from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should HERCULES fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program.

Based on the date of this approval letter, a Compliance Status Report, including certifications, is to be submitted on or before March 15, 2018

If you have any questions, please contact Carolyn L. Daniels, P.G. at (404) 657-8600.

Sincerely,



Charles D. Williams  
Program Manager  
Response and Remediation Program

File: HSI # 10696

✓c: David M. Wilderman, P.G., Arcadis U.S., Inc.

S:\RDRIVE\ DANIELSC\ SITES\HSRA\#10696 (Hercules Inc, Savannah)\VRP\VRP Application Approval.doc