

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1066 East, Atlanta, Georgia 30334

Reply To:
Response and Remediation Program
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Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

Mark Williams, Commissioner
Environmental Protection Division
F. Allen Barnes, Director
Land Protection Branch
Mark Smith, Branch Chief

May 20, 2011

VIA EMAIL & REGULAR MAIL

FILE COPY

Coats & Clark Inc.
c/o Mr. Mike Bell
374 Coats Drive
Toccoa, Georgia 30577-7986

Re: January 2011 Voluntary Investigation and
Remediation Plan Application
Coats & Clark Inc., HSI Site No. 10630
506 West Doyle Street, Toccoa, Georgia
Tax Parcel ID R583800 T10 005

Dear Mr. Bell:

The Georgia Environmental Protection Division (EPD) has received the January 31, 2011, revised Voluntary Investigation and Remediation Plan (VIRP) application that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. EPD acknowledges that this VIRP application was submitted in lieu of implementing an approved corrective action plan required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced property. EPD is approving your VIRP, which specifies corrective action consisting of the following:

- Dependent upon the results of the groundwater monitoring and associated modeling for the site, Coats & Clark Inc. may either execute engineering and/or institutional controls in the form of environmental covenants on the qualifying property(ies) in conformance with O.C.G.A. 44-16-1, et seq., the 'Georgia Uniform Environmental Covenants Act', or develop and implement an appropriate groundwater corrective action.
- Additional surface water monitoring and soil vapor monitoring will be conducted and compared to appropriate screening levels to confirm if an exposure pathway is complete. Should one of these exposure pathways pose an unacceptable risk, measures to mitigate this risk will be developed and implemented.
- Excavation activities associated with soils identified above Type 1-4 risk reduction standards (RRS) at sampling location TP-22 at the site were conducted in January 2006. On March 6, 2006, EPD concurred that the soils at the referenced site were in compliance with Type 1 RRS for silver and copper, Type 2 RRS for lead, and Type 3 RRS for antimony.

Therefore, EPD is accepting Coats & Clark Inc. as a participant as defined in the Voluntary Remediation Program Act for the following qualifying property provided Coats & Clark Inc. implements the VIRP in compliance with the following schedule and conditions:

Qualifying property:

Former Coats & Clark Inc.
506 West Doyle Street
Toccoa, Georgia 50577
Tax Parcel ID R583800 T10 005

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.
 - November 20th and May 20th through November 20, 2015

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

- May 20, 2012 semiannual progress report must include the vapor intrusion, surface water, and groundwater pathway evaluation for the qualifying property;
 - May 20, 2013 semiannual progress report must demonstrate complete horizontal delineation on all impacted properties; and,
 - November 20, 2013 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:
 - May 20, 2016

Conditions:

- 1) EPD requests the submittal of a cost estimate to complete the work proposed in the VIRP through the CSR submittal and a financial assurance instrument in that amount by no later than July 20, 2011. Model financial assurance instruments can be located at http://www.gaepd.org/Files_PDF/forms/hwb/HSIModel.pdf.

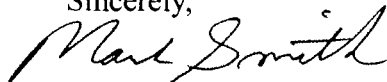
- 2) Coats & Clark Inc. must address EPD's comments dated May 20, 2011 and any other comments addressing the investigation and remediation pursuant to the Act to the satisfaction of the Director that it is consistent with the provisions, purposes, standards and policies of the Act.
- 3) Within ninety (90) days of Coats & Clark Inc.'s notice to withdraw from the Voluntary Remediation Program or termination by the Director pursuant to §12-8-107(d) of the Act, Coats & Clark Inc. must submit a compliance status report that complies with the requirements of the Hazardous Site Response Act and associated Rules for Hazardous Site Response.
- 4) Coats & Clark Inc. 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.

EPD requires that Coats & Clark Inc. 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 Coats & Clark Inc. However, failure of EPD to respond to a submittal within any timeframe does not relieve Coats & Clark Inc. from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Coats & Clark Inc. 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.

Should you have any question or concerns, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Mark Smith, Chief
Land Protection Branch

c: James VanderWoude, Toccoa Renaissance, LLP
File: VIRP Application 965147780 – Coats & Clark Inc.