



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## 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

October 3, 2017

### VIA E-MAIL AND REGULAR MAIL

Savannah-Chatham County Public School System  
c/o Mr. Mark W. Pickering, PE  
Director, Site Remediation  
208 Bull Street, Room 305  
Savannah, Georgia 31401

Re: Voluntary Investigation and Remediation Plan and Application, July 24, 2017  
Interchange Court Facility  
10 Interchange Court  
Savannah, Chatham County, Georgia  
Tax Parcel: 2-0597-01-003

Dear Mr. Pickering:

The Georgia Environmental Protection Division (EPD) is in receipt of the Voluntary Investigation and Remediation Plan (VIRP) and application dated July 24, 2017, submitted for the above referenced property (the Property) pursuant to the Georgia Voluntary Remediation Program Act (the Act). As a result of the VIRP submittal, EPD has deferred the release determination for the groundwater and on-site pathway evaluations pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced property. These pathways will be evaluated after the site cleanup activities are complete in accordance with the VIRP and upon receipt of the final Voluntary Remediation Program (VRP) Compliance Status Report (CSR) and risk reduction standards compliance certification.

After completing its review, EPD is approving your VIRP and application, which specifies corrective action consisting of the following:

- **Groundwater** - Monitor groundwater at the Site by conducting semiannual sampling to demonstrate attenuation and/or stabilization of regulated constituents of concern (COC) and to confirm the results of the groundwater fate and transport model. The monitoring program will be terminated by the end of the three year period if regulated COC concentrations are below Type 5 Risk Reduction Standards (RRS).
- **Soil Investigation** – Completion of three soil borings to the north, west and south of existing monitoring well MW-1. The soil analytical data will be evaluated to determine if any soil COCs above RRS are present and if any remedial action for the site is needed.
- **Institutional Controls** – Execute an environmental covenant for the site in conformance with O.C.G.A. 44-16-1, et seq., the “Georgia Uniform Environmental Covenants Act.”

Therefore, EPD is accepting Savannah-Chatham County Public School System (SCCPSS) as a participant as defined in the Act for the following qualifying property, provided SCCPSS implements the VIRP in compliance with the Act, the proposed schedule, and the following comments.

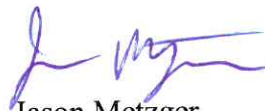
Qualifying property:

10 Interchange Court Facility  
Savannah, Chatham County, Georgia  
Tax Parcel: 2-0597-01-003

EPD requires that SCCPSS and the professional engineer/geologist specified in the Application 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 SCCPSS. However, failure of EPD to respond to a submittal within any timeframe does not relieve SCCPSS from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should SCCPSS fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the VRP.

EPD anticipates receipt of the first semiannual progress report by April 3, 2018. Although the VIRP schedule proposes submittal of a CSR in 5-years as required under the VRP, EPD expects that SCCPSS will demonstrate compliance within a more abbreviated schedule. Therefore, please provide a revised VRP completion schedule within the next scheduled Progress Report submittal. If you have any questions regarding this matter, please contact Patrick J. Klan of the Response and Remediation Program at (404) 657-8659.

Sincerely,



Jason Metzger  
Program Manager  
Response and Remediation Program

C: Justin Johnson, PG Terracon Consultants, Inc.

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