

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, 2018

Via U.S. Mail

And Email: oscar@protransportusa.com

Royal Transportation Services, Inc.
c/o Oscar Acharandio, President
10800 NW South River Drive
Miami, Florida 33178

Subject: Voluntary Remediation Program Application dated January 26, 2018
Coastal Concrete Site, HSI Site No. 10867
2337 Louisville Road, Savannah, Chatham County, Georgia

Dear Mr. Acharandio:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program Application (the Application) dated January 26, 2018, submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. §12-8-100, et seq. EPD acknowledges the Application was submitted in lieu of a Compliance Status Report, which was required pursuant to the Georgia Rules for Hazardous Site Response (the Rules). EPD is approving your Application, which proposes corrective action consisting of the following:

- Site investigation to include aquifer testing and delineation of regulated substances in soil and groundwater
- Evaluation of exposure pathways, including drinking water and vapor intrusion
- Fate and transport modeling, as required
- Semiannual groundwater monitoring
- The use of controls to restrict exposure to regulated substances in soil and groundwater and the implementation of a Uniform Environmental Covenant

Therefore, EPD is accepting Royal Transportation Services, Inc. (Royal Transportation) as a participant as defined in the Act for the following qualifying property provided Royal Transportation 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 October 3, 2018.

Qualifying Property:

2337 Louisville Road
Savannah, Chatham County, Georgia
Tax Parcel 2-0599-01-010

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.

Since Royal Transportation 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 Chatham County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20. Royal Transportation must also place the notice, as required by subparagraph 391-3-19-.08(1)(a) of the Rules, 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 Royal Transportation 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 Royal Transportation. However, failure of EPD to respond to a submittal within any timeframe does not relieve Royal Transportation from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Royal Transportation 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 April 3, 2019 and a Compliance Status Report (CSR), including certification of compliance with applicable Risk Reduction Standards, on or before October 3, 2023. Should you have any questions or concerns regarding this site, please contact Michael Smilley of the Response and Remediation Program at 404-657-8600.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: William S. Anderson, III, Terracon Consultants, Inc. (via email: wsanderson@terracon.com)

File: 242-0244 (VRP)

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