

February 22, 2019

Via U.S. Mail

And Email: stephanie@cubiclecurtainfactory.com

Ms. Stephanie Serio
7810 S. Dixie Highway
West Palm Beach, FL 33405

Subject: Voluntary Remediation Program Application dated November 27, 2018
2217 West Bay Street (HSI 10919)
2217 West Bay Street, Savannah, Chatham County, Georgia

Dear Ms. Serio:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program Application (the Application) dated November 27, 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 (CSR) 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:

- Additional soil and groundwater investigations to locate the source area and delineate site constituents of concern.
- Removal and investigation of the on-site underground storage tank (UST) in accordance with the EPD UST closure guidelines.
- Determination of site hydrogeological parameters and initiation of semi-annual groundwater monitoring to support the development of a groundwater fate and transport model.
- Vapor intrusion investigation at the referenced property and surrounding properties.
- Engineering and/or institutional controls to minimize the potential for exposure.

Therefore, EPD is accepting Stephanie Serio as a participant as defined in the Act for the following qualifying property, provided that the Voluntary Investigation and Remediation Plan (VIRP) contained in the Application is implemented in compliance with the Act, the schedule, and the EPD comment letter dated February 22, 2019.

Qualifying Property: 2217 West Bay Street
Savannah, Chatham, Georgia
Tax Parcel 2-0026-10-003

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 you are 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. You 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 you 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. However, failure of EPD to respond to a submittal within any timeframe does not relieve you from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should you 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 August 22, 2019 and a Compliance Status Report (CSR), including certification of compliance with applicable Risk Reduction Standards, on or before February 22, 2024. Should you have any questions or concerns regarding this site, please contact Ms. Susan Kibler of the Response and Remediation Program at 404-657-7126.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: Justin Johnson (via email: jjjohnson@terracon.com)

File: 242-0249 (VRP)

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February 22, 2019

VIA U.S. MAIL

AND E-MAIL: stephanie@cubiclecurtainfactory.com

Ms. Stephanie Serio
7810 S. Dixie Highway
West Palm Beach, FL 33405

Subject: EPD Comments
Voluntary Investigation and Remediation Plan dated November 27, 2018
2217 West Bay Street (HSI 10919)
2217 West Bay Street, Savannah, Chatham County, Georgia

Dear Ms. Serio:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated November 27, 2018 that was submitted as an application for enrollment in the Voluntary Remediation Program (VRP). EPD has the following comments:

1. Section 2.3 states that several drums were observed inside and outside the building. Please provide an update in the first progress report regarding the status of these drums.
2. EPD noted that section 4.1.3 *Site Geology* states that soil boring logs were included in Appendix E; however, the soil boring logs were not included. Please provide the soil boring logs in the first progress report along with any future soil boring logs.
3. Section 4.3.1 notes that there is a fence, and also that there is no fence. Please clarify the site accessibility in the first progress report.
4. Please provide the laboratory analytical reports for all analytical data reported in the VIRP.
5. EPD recommends that development and presentation of the BIOCHLOR fate and transport model be reserved until the source area and groundwater plume have been defined, and the hydrogeologic properties at the site are known.
6. Please add the following analyses to next groundwater sampling event: metals by United States Environmental Protection Agency (US EPA) Method 6010 and polychlorinated biphenyls by US EPA Method 8082A.
7. On page 2 of the VIRP Application Form and Checklist included in Appendix A, EPD noted that the Hazardous Site Inventory (HSI) site name is incorrectly listed as the "Former Commercial Electric Company". The correct HSI site name is "2217 West Bay Street". No revisions to the application are necessary.

The above comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards, and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by the participant. However, failure of EPD to respond to a submittal within any timeframe does not relieve the participant from complying with the provisions, purposes, standards, and policies of the Act. If you have any questions, please contact Ms. Susan Kibler at 404-657-7126.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: Justin Johnson (via email: jjjohnson@terracon.com)

File: 242-0249 (VRP)

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