

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King, Jr. Dr., Suite 1054 East, Atlanta, Georgia 30334

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

Judson Turner, Director

April 8, 2014

VIA E-MAIL AND REGULAR MAIL

Emory University
c/o Mr. Scott Thomaston, Associate Director,
Environmental Health and Safety Office
1762 Clifton Road, Suite 1200
Atlanta, Georgia 30322

RE: VIRP Application and Plan Approval
North Decatur Road/Burlington Road Site, HSI No. 10121
1784 North Decatur Road, Druid Hills, Dekalb County
Map 18 053 010 Lot 03

Dear Mr. Thomaston:

The Georgia Environmental Protection Division (EPD) has reviewed the January 13, 2014, Voluntary Investigation and Remediation Plan (VIRP) Application submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). The VIRP was submitted in lieu of annual corrective action progress reports 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:

- A previously operated soil vapor extraction (SVE) system which remediated impacted soils to Type 1 risk reduction standards,
- Evaluate potential groundwater and vapor exposure through monitoring and address with the use of controls, as necessary.

Therefore, EPD is accepting Emory University as a participant as defined in the Voluntary Remediation Program Act for the following qualifying property provided Emory University implements the VIRP in compliance with the following schedule and conditions and that the comments embedded in this approval are addressed:

Qualifying property:

1784 North Decatur Road
Druid Hills, Dekalb County, Georgia 30307
Map 18 053 010 Lot 03

Comments:

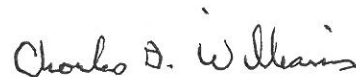
1. Please review and correct any inconsistencies among results in tables and figures when comparing to the laboratory results. For example, regarding the sampling data from June 26, 2013, MW-4 in Table 2 shows the concentration of tetrachloroethylene (PCE) as 14 ug/L but Figure 5 and the laboratory analytical results indicate 12 ug/L. The laboratory analytical results and Table 2 indicate that RW-4 had a PCE concentration of 68 ug/L but Figure 5 indicates 64 ug/L.
2. In an April 5, 2013 letter to Emory, EPD acknowledged that the PCE plume was expanding due to the results from MW-4 located to the southwest. Subsequently, EPD received a Release Notification from North Decatur Properties located south of Emory at 1743, 1767 and 1785 North Decatur Road reporting PCE in groundwater at 44 ug/L. Depending on the results of the proposed fate and transport modeling and vapor intrusion analysis, these properties may need to be designated as qualifying properties under the VIRP, or otherwise addressed.
3. EPD recommends that some key items, e.g. modeling results, be submitted well in advance of the compliance status report (CSR) submittal to ensure compliance with the Act.

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

If you have any questions, please contact Montague McPherson at (404) 657-0483.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Dale P. Voykin - URS Corporation
File: HSI No. 10121