

Georgia Department of Natural Resources

Environmental Protection Division

2 Martin Luther King, Jr. Dr., SE, Suite 1154, Atlanta, Georgia 30334-9000

Judson H. Turner, Director

Land Protection Branch

Keith M. Bentley, Branch Chief

Reply To:

Response and Remediation Program

2 Martin Luther King Jr. Dr., S.E.

Suite 1462, East Tower

Atlanta, Georgia 30334-9000

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

November 20, 2012

COPY

VIA E-MAIL AND U.S. MAIL

ARAMARK Uniform and Career Apparel, LLC

c/o Mr. Doug Helmstetler, Senior Director of Environmental Compliance and Sustainability

115 N. First Street

Burbank, CA 91502

Re: Voluntary Investigation and Remediation Plan (VIRP)/Voluntary Remediation Program (VRP) Application (July 25, 2011) and Supplement to Application for VRP (July 16, 2012)
ARAMARK Uniform & Career Apparel, Inc. (ARAMARK)
670 and 690 DeKalb Avenue, HSI No. 10704
Atlanta, Fulton County, Georgia
(Tax Parcel Nos. 14-0020-0001-019-6 and 14-0020-0000-202-4)

Dear Mr. Helmstetler:

The Georgia Environmental Protection Division (EPD) has reviewed the July 25, 2011 Voluntary Investigation and Remediation Plan (VIRP)/VRP application and the subsequent July 16, 2012 supplement to the VRP application submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) for the subject property, which is listed on the Georgia Hazardous Sites Inventory as HSI 10704. The initial VIRP was submitted in lieu of Groundwater Monitoring Report/Progress Report. The Supplement was submitted in response to verbal inquiries by EPD personnel.

EPD is approving your VIRP/VRP Application and subsequent revisions, which specifies corrective action consisting of the following:

- Additional site investigation(s) to establish the horizontal delineation of regulated substances in groundwater that exceed approved Type 1 RRS;
- Excavation of soil impacted by regulated substances at concentrations exceeding Type 1 RRS or implementation of engineering (construction of a cap over impacted soil to prevent exposure and reduce rain infiltration) and institutional controls which will include implementation of an environmental covenant that conforms with O.C.G.A. §44-16-1, *et seq*, the Georgia Uniform Environmental Covenants Act for the qualifying properties, which will restrict the future uses of the qualifying property for the purpose of certifying compliance with site-specific cleanup standards [O.C.G.A. §12-8-107(h) of the Act].

Therefore, EPD is accepting ARAMARK Uniform and Career Apparel LLC (ARAMARK) as a participant as defined in the Voluntary Remediation Program Act for the following qualifying properties provided ARAMARK implements the VIRP in compliance with the following schedule and conditions:

Qualifying properties:

670 and 690 DeKalb Avenue
Atlanta, Fulton County, Georgia
Tax Parcel Nos. 14-0020-0001-019-6 and 14-0020-0000-202-4

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.
 - Every May 20 and November 20 through May 20, 2017.

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

- November 20, 2013 semiannual progress report must demonstrate complete horizontal delineation on the qualifying property.
 - November 20, 2014 semiannual progress report must demonstrate complete horizontal delineation on all impacted properties.
 - May 20, 2015 semiannual progress report must demonstrate complete horizontal and vertical delineation, finalize the remediation plan (including proposed site-specific cleanup standards, if necessary) and provide a preliminary cost estimate for implementation of remediation and associated continuing actions.
- Compliance Status Report including certifications:
 - November 20, 2017. A copy of a proposed environmental covenant, as required, for the qualifying property must be submitted; along with a list of property abutters, their mailing information, and tax parcel identification numbers and a title report; for execution by the Director with this submittal.

Conditions:

1. EPD requests the submittal of a financial assurance instrument for the amount of \$115,000 by no later than January 20, 2013. Model financial assurance instruments can be located at http://www.gaepd.org/Files_PDF/forms/hwb/HSIModel.pdf. ARAMARK is currently maintaining an Irrevocable Letter of Credit (LOC Number SM237677W) through Wells Fargo in the amount of \$1 million for implementation of an approved corrective action plan to be implemented pursuant to the Georgia Hazardous Site Response Rules (Chapter 391-3-19). ARAMARK may revise said LOC to include corrective measures to be conducted pursuant to the approved VIRP, with proof provided to EPD, in *lieu* of obtaining a separate financial assurance instrument for said VIRP corrective measures.
2. ARAMARK must address EPD's notice of deficiencies dated November 20, 2012 and any other subsequent notice of deficiencies 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 ARAMARK's notice to withdraw from the Voluntary Remediation Program or termination by the Director pursuant to §12-8-107(d) of the Act, ARAMARK must submit a compliance status report (CSR) that complies with the requirements of the Hazardous Site Response Act and associated Rules for Hazardous Site Response.
4. ARAMARK 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 documents that exceed the initial application fee.
5. Since ARAMARK is performing corrective action at the qualifying properties in accordance with an approved VIRP, the qualifying properties will continue to be classified as Class V 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 Fulton County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20.

ARAMARK must also place the following notice, or revise previous notices recorded pursuant to the Georgia Hazardous Site Response Rules, Chapter 391-3-19, in any deed, mortgage, deed to secure debt, lease, rental agreement or other instrument given or caused to be given by the property owner which creates an interest in or grants a use of the property:

"This 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. Contact

the property owner or the Georgia Environmental Protection Division for further information concerning this property. This notice is provided in compliance with the Georgia Hazardous Site Response Act and the Voluntary Remediation Program Act."

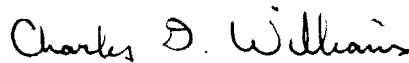
Within 30 days of recording, the affidavit or revision to affidavit, please send a copy of the receipt of the recorded affidavit to the Response and Remediation Program, Georgia Environmental Protection Division, 2 Martin Luther King Jr. Drive, SE, Suite 1462, Atlanta, GA 30334.

EPD requires that ARAMARK and the professional engineer/geologist specified in the VIRP, and the July 16, 2012 supplemental information, 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 ARAMARK. However, failure of EPD to respond to a submittal within any timeframe does not relieve ARAMARK from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should ARAMARK 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 Carolyn L. Daniels, P.G. at (404) 657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

File: HSI# 10704

c: Stephanie Walters, Counsel, ARAMARK
Steven Hart, Atlanta Environmental Management, Inc.
Michael Brock, Atlanta Environmental Management, Inc. (via email only)
Becky Armbruster, The Wetlands Company

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