

# Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, SE, Suite 1462 East, Atlanta, Georgia 30334

**Reply To:**  
Response and Remediation Program  
2 Martin Luther King, Jr. Drive, S.E.  
Suite 1462, East Tower  
Atlanta, Georgia 30334-9000  
Office 404/657-8600 Fax 404-657-0807

Mark Williams, Commissioner  
Environmental Protection Division  
F. Allen Barnes, Director  
Land Protection Branch  
Mark Smith, Branch Chief

February 14, 2011

## VIA E-MAIL AND REGULAR MAIL

# FILE COPY

Metalplate Galvanizing, L.P.  
c/o Mr. Adam T. Brown, Vice President  
Technical & Environmental Affairs  
505 Selig Drive SW  
Atlanta, Georgia 30336

RE: Voluntary Investigation and Remediation Plan and Application, August 9, 2010  
Metalplate Galvanizing Facility, HSI No. 10204  
505 Selig Drive, SW., Atlanta, Fulton County, Georgia  
Tax Parcel 14F-0082-LL-0346

Dear Mr. Brown:

The Georgia Environmental Protection Division (EPD) has reviewed the August 9, 2010, Voluntary Investigation and Remediation Plan (VIRP) 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 voluntary remediation plan, which specifies correction action consisting of the following:

- Execution of a Uniform Environmental Covenant, and
- Evaluation of groundwater/surface water interactions and implementation of steps necessary to address impacted surface water.

Therefore, EPD is accepting Metalplate Galvanizing, L.P. as a participant as defined in the Voluntary Remediation Program Act for the following qualifying property provided Metalplate Galvanizing, L.P. implements the VIRP in compliance with the following schedule and conditions:

Qualifying property:

Metalplate Galvanizing Facility  
505 Selig Drive SW, Atlanta, Fulton County, Georgia  
Tax Parcel 14F-0082-LL-0346

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.

- August 14th and February 14th through August 14, 2015.

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

- February 14, 2012 semiannual progress report must demonstrate complete horizontal delineation on the qualifying property;
  - February 14, 2013 semiannual progress report must demonstrate complete horizontal delineation on all impacted properties; and,
  - August 14, 2013 semiannual progress report must demonstrate complete horizontal and vertical delineation, finalize the remediation plan and provide a cost estimate for implementation of remediation and associated continuing actions. EPD recommends that the participant finalize approval of cleanup standards for all regulated substance prior to this submittal.
- Compliance status report including certifications:
    - February 14, 2016

Conditions:

1. EPD requests the submittal of a cost estimate for full implementation of the VIRP through CSR submittal and a financial assurance instrument in that amount by no later than April 18, 2011. Model financial assurance instruments can be located at [http://www.gaepd.org/Files\\_PDF/forms/hwb/HSIModel.pdf](http://www.gaepd.org/Files_PDF/forms/hwb/HSIModel.pdf).
2. Metalplate Galvanizing, L.P. must address EPD's comment letter dated February 14, 2011 and any other comment letter 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 Metalplate Galvanizing, L.P.'s notice to withdraw from the Voluntary Remediation Program or termination by the Director pursuant to §12-8-107(d) of the Act, Metalplate Galvanizing, L.P. must submit a corrective action plan that complies with the requirements of the Hazardous Site Response Act and associated Rules for Hazardous Site Response.
4. Metalplate Galvanizing, L.P. 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 document that exceeds the initial application fee.
5. Metalplate Galvanizing, L.P. must continue investigation and remediation of off-property contamination pursuant to the Hazardous Site Response Act (HSRA) and its associated Rules until those impacted properties are enrolled in the Voluntary Remediation Program. Furthermore, Metalplate Galvanizing, L.P. must remain in compliance with HSRA and its associated Rules; otherwise, Metalplate Galvanizing, L.P. may not be eligible as a participant in the Voluntary Remediation Program.

EPD requires that Metalplate Galvanizing, L.P. 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 Metalplate Galvanizing, L.P. However, failure of EPD to respond to a submittal within any timeframe does not relieve Metalplate Galvanizing, L.P. from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Metalplate Galvanizing, L.P. 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 of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Mark Smith, Chief  
Land Protection Branch

cc: Ernest M. Cain, Vice President, Metalplate Galvanizing, L.P.  
Gregory Wrenn, PE, MACTEC  
James Levine, McKenna Long & Aldridge LLP

File: HSI No. 10204

S:\RDRIVE\MONTMC\HSI\METPLATE\VRP appl-approval.doc