

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Drive S.E., Suite 1054 East, Atlanta, Georgia 30334

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Judson H. Turner, Director

404-657-8600

December 5, 2013

FILE COPY

VIA E-MAIL AND U.S. MAIL

Mr. James McClatchey, Vice-President-Production Manager
Southern Metal Finishing Company
1581 Huber Street
Atlanta, Georgia 30318

Re: Voluntary Investigation and Remediation Plan (VIRP) and Application, November 2011; Southern Metal Finishing Company, LLC, HSI #10689
Atlanta, Fulton County, Georgia 30318 (Tax Parcel No. 17-0187-LL-059-6)

Dear Mr. McClatchey:

The Georgia Environmental Protection Division (EPD) has reviewed the November 2011 Voluntary Investigation and Remediation Plan (VIRP), submitted pursuant to the Georgia Voluntary Remediation Program Act (the VRP Act) for the subject parcel, which is listed on the Georgia Hazardous Sites Inventory (HSI) as HSI 10689. Said VIRP was submitted in lieu of a corrective action plan for the subject property required by the Georgia Rules for Hazardous Site Response (Rules).

A revised corrective action plan (CAP) for the site, dated August 7, 2013, was submitted in accordance with the Rules and Condition 2 of Administrative Order EPD-HSR-445. The CAP was submitted in accordance with the April 15, 2013 meeting held between EPD and Southern Metal Finishing. At that meeting, EPD agreed to accept Southern Metal Finishing Company into the VRP for their property if a suitable Work Plan for Monitored Natural Attenuation for all other properties that comprise the Woodall Creek Site was received by EPD. This Work Plan was part of the CAP dated August 7, 2013.

EPD is approving your VIRP/VRP Application, 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;
- Install POD wells;
- Conduct groundwater fate-and-transport modeling to derive site-specific cleanup standards;
- Provide a remediation plan and provide a preliminary cost estimate for implementation of remediation and associated continuing actions as necessary to meet site-specific cleanup standards;

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- Implementation of 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 property, 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 Southern Metal Finishing Company as a participant as defined in the Voluntary Remediation Program Act for the following qualifying property provided Southern Metal Finishing Company implements the VIRP in compliance with the following schedule:

Qualifying property:

1581 Huber Street, N.W.
Atlanta, Fulton County, Georgia
Tax Parcel No. 17-0187-LL-059-6

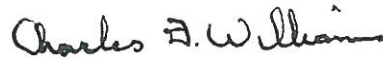
Schedule:

- Compliance Status Report including certifications must be submitted by November 25, 2018:

Southern Metal Finishing Company is responsible for selecting a professional engineer/geologist, as specified in the VIRP, to 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 Southern Metal Finishing Company. However, failure of EPD to respond to a submittal within any timeframe does not relieve Southern Metal Finishing Company from complying with the specified schedule and the provisions, purposes, standards and policies of the Act.

If you have any questions, please contact Larry Kloet at (404) 657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

File: HSI# 10689

c: Jerry Gacetta (AMEC)
Scott Laseter, Attorney