



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

June 30, 2017

VIA U.S. MAIL AND EMAIL

CBS Corporation
c/o Richard K. Smith, Vice President, Environmental Remediation
PNC Center
20 Stanwix Street, 10th Floor
Pittsburgh, PA 15222

Subject: Voluntary Remediation Program Application dated November 29, 2011
1610 Southland Circle (fka "Indcon"), HSI No. 10077
1610 Southland Circle, Atlanta, Fulton County, Georgia
Tax Parcel No. 17-0192-LL-051-6

Dear Mr. Smith:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program Application (Application) dated November 2011 submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. §12-8-100, et seq. EPD acknowledges that this Application was submitted in lieu of continuing monitoring and remediation as detailed in the December 2005 Corrective Action Plan conditionally approved by EPD on September 18, 2006, which was required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced site. EPD is approving your Application, which proposes corrective action consisting of the following:

- Vapor intrusion assessment for occupied buildings on the qualifying property and any occupied buildings located on properties located hydraulically downgradient that are potentially impacted by groundwater contamination related to the release of regulated substances at the qualifying property;
- Groundwater contaminant fate and transport modeling to assess if the groundwater contaminant plume poses an unacceptable risk at applicable points of exposure;
- Confirmation of groundwater use in the immediate vicinity of the qualifying property;
- Additional site investigation to establish the horizontal delineation of regulated substances in soil and groundwater;
- Engineering and institutional controls to restrict exposure pathways. A Uniform Environmental Covenant will be executed to establish activity and use limitations and document controls being relied upon for compliance with cleanup standards.

Therefore, EPD is accepting CBS Corporation (CBS) as a participant as defined in the Act for the following qualifying property provided CBS implements the Voluntary Investigation and Remediation Plan (VIRP) contained in the Application in compliance with the Act, the schedule, and the EPD comment letter dated June 30, 2017.

Qualifying Property:

1610 Southland Circle
Atlanta, Fulton County, Georgia
Tax Parcel No. 17-0192-LL-051-6

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 CBS is 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, the property owner is required to file an affidavit, if not previously filed, stating that the 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. The property owner 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 CBS and the professional engineer/geologist specified in the Application oversee the implementation of the Voluntary Investigation and Remediation Plan 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 CBS. However, failure of EPD to respond to a submittal within any timeframe does not relieve CBS from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should CBS 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 December 30, 2017 and a Compliance Status Report (CSR), including certification of compliance with applicable Risk Reduction Standards, on or before June 30, 2022.

VRP Application Approval
CBS Corporation
June 30, 2017
Page 3 of 3

Should you have any questions or concerns regarding this site, please contact Carolyn L. Daniels, P.G. of the Response and Remediation Program at (404) 657-8646.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

- c: Leo M. Brausch, Brausch Environmental, LLC (via email)
- Terefe Mazengia, PG., GHD (via email)
- Joy Gunter Pugh, GTG Properties, LLC (via email)
- Catherine Fox, Fox Environmental, LLC (via email)
- Ken Feely, USEPA Region 4 (via email)

File: 261-0518 (VRP)

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