

# Georgia Department of Natural Resources

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

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

December 6, 2010

VIA E-MAIL AND REGULAR MAIL

**FILE COPY**

Former Shareholders of W.B. Roddenbery Co.  
c/o Ms. Rebecca R. Cline, Shareholder's Representative  
1393 Stephen Drive, N.W.  
Cairo, GA 39828

Re: Voluntary Investigation and Remediation Plan (VIRP)/Voluntary Remediation Program (VRP) Application  
(August 25, 2010) and Addendum to VRP Application (November 30, 2010)  
Former W.B. Roddenbery Syrup Plant (Tax Parcel No. CO200-083-000)  
301 First Street NW (also referred to as 101 1<sup>st</sup> Street NW and 301 First Avenue)  
Cairo, Grady County, Georgia

Dear Ms. Cline:

The Georgia Environmental Protection Division (EPD) has reviewed the August 25, 2010 Voluntary Investigation and Remediation Plan (VIRP) and the subsequent November 30, 2010 Addendum 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 10213. The initial VIRP was submitted in lieu of an Annual Groundwater Compliance Monitoring Report. The November 30, 2010 Addendum was submitted in response to EPD's November 30, 2010 letter listing several deficiencies within the VIRP. EPD has determined that your responses to the November 30, 2010 letter are adequate *with the exception of the proposed delineation criteria [(the Type 2 Risk Reduction Standard (RRS)) for pentachlorophenol in groundwater (see second bullet below)*, and is approving your VIRP, which specifies corrective action consisting of the following:

- Verification of groundwater and surface water usage within 1,000 ft downgradient of the qualifying property;
- Conducting a comprehensive groundwater sampling event to establish current site conditions. All groundwater samples will be analyzed for naphthalene and pentachlorophenol at a minimum. *Delineation criteria for naphthalene and pentachlorophenol in groundwater shall be the Type 1 RRS established as 20 µg/L and 1 µg/L, respectively, pursuant to §12-8-108 of the Act;* and
- Submittal of a report [compliance status report] pursuant to §12-8-107(a)(2) of the Act that documents the results of the well survey and groundwater sampling event; and confirms consistency of corrective action(s) with the provisions, purposes, standards, and policies of the Act and certifies the compliance of the qualifying property with the applicable voluntary remediation cleanup standards.

Therefore, EPD is accepting the Former Shareholders of W.B. Roddenbery Company as a participant as defined in the Voluntary Remediation Program Act for the following qualifying property provided the Former Shareholders of W.B. Roddenbery Company implements the VIRP and Addendum in compliance with the following schedule and conditions:

**Qualifying property:**

301 First Street NW (also referred to as 101 1<sup>st</sup> Street NW and 301 First Avenue)  
Cairo, Grady County, Georgia  
Tax Parcel No. CO200-083-000

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:**

- Compliance status report including certifications and documentation regarding groundwater usage and current groundwater analytical results summarized in tabular format:
  - June 30, 2011

**Conditions:**

1. Within ninety (90) days of the Former Shareholders of W.B. Roddenbery Company notice to withdraw from the Voluntary Remediation Program or termination by the Director pursuant to §12-8-107(d) of the Act, the Former Shareholders of W.B. Roddenbery Company must submit a compliance status report that complies with the requirements of the Hazardous Site Response Act and associated Rules for Hazardous Site Response.
2. The Former Shareholders of W.B. Roddenbery Company 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 the exceeds the initial application fee.
3. Within 7 days of submitting the above-referenced CSR, the Former Shareholders of W.B. Roddenbery Company are required pursuant to §12-8-107(a)(2) of the Act, to: 1) Publish a notice in the *Cairo Messenger* and *Thomasville Times-Enterprise*, announcing that such a report is available for inspection by the general public, and 2) provide written notice to the Grady County and the City of Cairo of submittal of the CSR in accordance with §391-3-19-.06(5)(a) and (e) of the Georgia Hazardous Site Response Rules. Proof of the referenced public notices should be provided to the EPD showing that the public notice has been conducted appropriately and in accordance with the Georgia Hazardous Site Response Rules.
4. Provide a copies of the CSR to *all* affected property owners and provide proof of delivery of said copies (*i.e.*, copies of the cover letters and signed return receipts, *etc.*) to EPD.

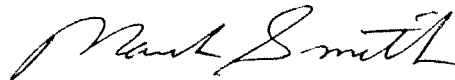
EPD requires that the Former Shareholders of W.B. Roddenbery Company and the professional engineer/geologist specified in the VIRP oversee the implementation of the VIRP in accordance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by the Former Shareholders of W.B. Roddenbery Company. However, failure of EPD to respond to a submittal within any timeframe does not relieve the Former Shareholders of W.B. Roddenbery Company from complying with the specified schedule and the provisions, purposes, standards and policies of

the Act. Should the Former Shareholders of W.B. Roddenbery Company 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,



Mark Smith, Chief  
Land Protection Branch

File: HSI# 10213

c: Frank Nowicki, Gallet & Associates, Inc.

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