

# Georgia Department of Natural Resources

**Reply To:**

Response and Remediation Program  
2 Martin Luther King, Jr. Drive, S.E.  
Suite 1054, East Tower  
Atlanta, Georgia 30334-9000  
Office 404/657-8600 Fax 404-657-0807

**Environmental Protection Division-Land Protection Branch**

2 Martin Luther King, Jr. Dr., Suite 1054, Atlanta, Georgia 30334  
(404) 656-7802 Fax (404) 651-9425  
Judson H. Turner, Director

December 11, 2013

**VIA E-MAIL AND REGULAR MAIL**

THGC Wrens LLC  
c/o Mr. Curtis Michael  
Vice President/Assistant General Counsel  
400 Plaza Drive, P.O. Box 1515  
Secaucus, New Jersey 07096-1515

Re: Voluntary Investigation and Remediation Plan and Application, dated August 23, 2013  
Former Oil Processing Corporation Property, HSI Site No. 10245  
Industrial Street, Wrens, Jefferson County, Georgia 30833  
Tax Parcel ID: 0085 008

Dear Mr. Michael:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated August 23, 2013 submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). The VIRP was submitted in lieu of a Revised Corrective Action Plan 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 corrective action consisting of the following: monitored natural attenuation via semi-annual groundwater monitoring events and reporting, and potential in-situ chemical oxidation (ISCO) treatment of groundwater.

Former Oil Processing Corporation Property is a participant as defined in the Voluntary Remediation Program Act for the following qualifying property, provided the Former Oil Processing Corporation Property implements the VIRP in compliance with the following schedule and conditions:

Qualifying property:

Former Oil Processing Corporation Property, HSI Site No. 10245  
Industrial Street, Wrens, Jefferson County, Georgia 30833  
Tax Parcel ID: 0085 008

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.

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. EPD anticipates receipt of the first semi-annual progress report by June 13, 2014, and a Compliance Status Report, including certifications on or before December 13, 2018.

Conditions:

1. Because the Former Oil Processing Corporation Property is performing corrective action at the qualifying property in accordance with an approved voluntary remediation plan, EPD is hereby reclassifying it from Class I to Class V and designating it 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 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 Jefferson County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20.

The Former Oil Processing Corporation Property must also place the following notice 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, 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.

If you have any questions, please contact Mr. Fred Rowe at (404) 657-8600.

Sincerely,



Charles D. Williams  
Program Manager  
Response and Remediation Program

c: John P. Martiniere, P.E.

File: Former Oil Processing Corporation Property, HSI Site No. 10245  
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