

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King, Jr. Drive, SE, Suite 1054 East, Atlanta, Georgia 30334
(404) 657-8600; Fax (404) 657-0807
Judson H. Turner, Director

December 3, 2015

VIA E-MAIL AND REGULAR MAIL

Dr. Harinderjit Singh
Columbia County Car Care Center
3685 Wheeler Road, Suite 201
Augusta, Georgia 30909

RE: Fourth Semi-Annual VIRP Progress Report, September 18, 2015
Response to EPD Comments for Semi-Annual VIRP Progress Reports, July 21, 2015
Columbia County Car Care Center, HSI No. 10394
4014 Washington Road, Martinez, Columbia County, Georgia

Dear Dr. Singh:

The Georgia Environmental Protection Division (EPD) has reviewed the Columbia County Car Care Center's (5C) Fourth Semi-Annual Voluntary Investigation and Remediation Plan (VIRP) Progress Report dated September 18, 2015 and the July 21, 2015 Response to EPD's March 20, 2015 comments. EPD's comments are provided below and should be addressed in accordance with the Voluntary and Remediation Program Act (the Act).

1. EPD concurs with 5C that the groundwater exposure pathway is not complete and that vapor intrusion is of no risk to the existing buildings on 5C's property. EPD was able to replicate similar results using the United States Environmental Protection Agency's (USEPA) Vapor Intrusion Screening Level (VISL) calculator.
2. EPD will require that 5C implement a Uniform Environmental Covenant (UEC) for their property. A UEC should be developed for the affected parcel as part of the final remedy. This UEC should include the following Activity Use and Limitations: 1.) restrictions on the use or extraction of groundwater beneath the Property for drinking water or for any other non-remedial purposes; 2.) the requirement that a vapor intrusion model be developed and submitted to EPD before any building reconstruction can occur; 3.) prior to conducting construction or subsurface utility work that may result in exposure to soil or groundwater in the designated areas, a worker must have appropriate HAZWOPER training per OSHA's Hazardous Waste Operations and Emergency Response Standard 29 CFR 1910.120; and 4.) submittal of annual Site Use, Activity and Monitoring inspections that certify that the asphalt is still in place and in good condition and certification of non-residential use of the Property.

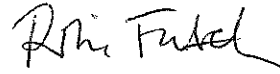
5C must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by 5C. However, failure of EPD to respond to a submittal within any timeframe does not relieve 5C from complying with the provisions, purposes, standards and policies of the Act.

Please submit a compliance status report (CSR), certifying RRS for both soil and groundwater, that also addresses the above comments, by March 15, 2016. A draft of the UEC may be submitted with or prior to the CSR submittal for EPD's review and comment.

Dr. Harinderjit Singh
December 3, 2015
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If you have any questions, please contact Montague McPherson of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Robin Futch
Acting Unit Coordinator
Response and Remediation Program

c: Martin A. Shelton, Weissman Novack Curry & Wilco
Preston McFarland, AXA Equitable Life Insurance Co.

File: HSI No. 10394

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