

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

May 22, 2015

Davidson-Kennedy Company
c/o Mr. Joseph H. Rubin
5273 Redfield Road
Dunwoody, Georgia 30338

RE: 7th Semi-Annual VRP Progress Report, December 2014
Revised Corrective Action Plan and Final Preliminary Risk Evaluation, May 2015
Davidson-Kennedy Company Property, HSI Site No. 10866
1195 Victory Drive, Atlanta, Fulton County, Georgia
Tax Parcel 14-0121-0007-002-4

Dear Mr. Rubin:

The Georgia Environmental Protection Division (EPD) has reviewed the December 2014 VRP Progress Report and the Revised Corrective Action Plan (CAP) and Final Preliminary Risk Evaluation (PRE) dated May 2015, submitted for the above referenced Site pursuant to the Georgia Voluntary Remediation Program Act (the Act). The Revised CAP/PRE report was initially submitted March 24, 2015, and the May 2015 revision is based on our April 23, 2015 meeting and subsequent emails, which are also incorporated into this review. EPD approves the revised corrective action plan, subject to the comments provided below, which should be addressed in accordance with the Act:

Remedial Plan

1. EPD agrees with the proposed approach to address exceedences in Domain 2 and Domain 3 and methodology proposed to bring those exposure domains into compliance with the compliance criteria of 400 mg/Kg. Please collect confirmation samples for laboratory analysis from all areas excavated to meet compliance criteria. Post excavation results from exceedence blocks should not be used to demonstrate compliance with the compliance criteria until all exceedence blocks have been excavated.
2. XRF analysis must be completed in accordance with procedures described in USEPA Region 4 Science and Ecosystem Support Division Field Branches Quality System and Technical Procedures, X-Ray Fluorescence Measurement, dated December 20, 2011. Please provide a calibration curve for the XRF analysis and a comparison of XRF results and laboratory analytical results.
3. EPD understands that the proposed outline for the 'Mandatory/Compliance Excavation is based on four samples collected in September 2014. Please confirm the proposed southwest wall of the compliance excavation area extends far enough to remove any material above 10,000 mg/Kg or that results in the exceedence of the compliance criteria for that exposure domain. A description of the sampling procedure and the laboratory data

from the September 2014 event should be included in the Compliance Status Report (CSR).

4. EPD's approval of this report and of the remedial approach in general, is contingent on the revised geostastical analysis which will include a sensitivity analysis, to be included in the final CSR. Please implement corrective action as described paying special attention to areas of kriged elevated lead concentrations where previous data is not available.

Uniform Environmental Covenant

5. The December 2014 report states that a revised draft of the uniform environmental covenant (UEC) for the above referenced property will be submitted under separate cover. Please submit the revised UEC, which incorporates comments from EPD's October 23, 2014 letter, by August 1, 2015.

Preliminary Risk Evaluation

6. EPD agrees with the conclusions provided in the PRE; therefore, no additional remediation is necessary at this time to mitigate ecological risk provided that the UECs include inspection and maintenance requirements that eliminate erosion of potentially contaminated material into surface water.
7. EPD acknowledges that analytical results provided for sample DK-3 in the December 2014 report were not accurate due to a laboratory error, and that the corrected results are included in the March 2015 PRE. Lab reports for the most recent surface water and sediment sampling must be included in the final compliance status report along with a short description of the error.

Davidson-Kennedy Company 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 Davidson-Kennedy Company. However, failure of EPD to respond to a submittal within any timeframe does not relieve Davidson-Kennedy Company from complying with the provisions, purposes, standards and policies of the Act.

The next progress report, due December 30, 2015, should include the results of the remedial plan implementation. If you have any questions, please contact John Maddox of the Response and Remediation Program at (404) 463-0076.

Sincerely,



Jason Metzger
Unit Coordinator
Response and Remediation Program

C: John P. Martiniere Jr., P.E. – Peachtree Environmental

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