

# Georgia Department of Natural Resources

## Environmental Protection Division

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Judson H. Turner, Director

Land Protection Branch

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Phone: 404-657-8600 Fax: 404-657-0807

October 15, 2012

### **VIA U.S. MAIL and EMAIL**

Mr. William D. Graham, Jr.  
2035 Bethany Road  
Alpharetta, Georgia 30001

RE: EPD Comments  
Voluntary Investigation and Remediation Plan and Application, September 7, 2012  
Hazardous Site Inventory No. 10637 (Welcome Years, Inc.)  
Property of William D. Graham, Jr.  
1071 Howell Mill Road  
Atlanta, Fulton County, Georgia 30318  
Tax Parcel: 17015000090144

Dear Mr. Graham:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated September 11, 2012 submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has the following comments:

1. To comply with Type 5 Risk Reduction Standards (RRS) for soil, it must be demonstrated that surface soil (0 – 2 feet below the ground surface) in any area of the subject property not covered by a concrete or asphalt cap is in compliance with residential (Type 1 or 2) Risk Reduction Standards (RRS), or it must be demonstrated that surface soil meets soil exposure criteria for Type 5 RRS described in Section 391-3-19.07(10) of the Rules for Hazardous Site Response (Rules) for a residential scenario. EPD recommends sampling surface soil at depths of 0 – 6 inches and 18 – 24 inches below the ground surface in any such areas.
2. Monitoring wells within the current or future building footprint should be properly abandoned using appropriate procedures similar to those specified in Section 2.8 of the United States Environmental Protection Agency Region 4 SESD *Design and Installation of Monitoring Wells* guidance document, effective date February 18, 2008, which is available at:  
<http://www.epa.gov/region4/sesd/fbqstp/Design-and-Installation-of-Monitoring-Wells.pdf>
3. EPD will require annual groundwater monitoring for volatile organic compounds for five (5) years at monitoring wells MW-1R and MW-3. Please ensure that groundwater sampling is conducted in accordance with the most recent USEPA Region 4 SESD Groundwater Sampling operating procedure. As of the date of this letter, the most recent version is dated October 28, 2011 and is available at:

<http://www.epa.gov/region4/sesd/fbqstp/Groundwater-Sampling.pdf>

4. EPD will not require additional assessment of vapor intrusion at this time. However, if volatile organic compound concentrations in groundwater increase significantly, additional assessment may be required.
5. Demonstrating compliance with Type 5 RRS for soil will require a continuing monitoring plan approved by EPD and the execution of a Uniform Environmental Covenant. Information regarding Uniform Environmental Covenants is available at:

<http://www.gaepd.org/Documents/uec.html>

A schedule must be submitted to EPD no later than November 15, 2012 for the submittal of a continuing monitoring plan, the submittal of a Uniform Environmental Covenant, and the submittal of a final Prospective Purchaser Compliance Status Report certifying compliance with Type 5 RRS.

You 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 future documents that you submit. However, failure of EPD to respond to a submittal within any timeframe does not relieve you from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact David Hayes at 404-657-8600.

Sincerely,



Charles D. Williams  
Program Manager  
Response and Remediation Program

cc: John Spinrad, Arnall Golden Gregory LLP (via email)  
Chuck Ferry, AMEC (via email)

File: HSI 10637