

**Georgia Department of Natural Resources**  
**Environmental Protection Division**

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Judson H. Turner, Director  
Land Protection Branch  
Phone: 404/657-8600 FAX: 404/657-0800

April 23, 2014

Eric Ranney  
Lebow Land Company, LLC  
78 Milton, LLC  
1120 Maple Lane  
White Plains, Georgia 30678

**VIA FIRST CLASS MAIL AND EMAIL**

Re: Supplemental Comments on Voluntary Remediation Plan Application  
78 Milton Avenue, SE, Atlanta, Georgia; Fulton County  
U.S. Plating Burn Site, HSI Site No. 10264

**COPY**

Dear Mr. Ranney:

The Georgia Environmental Protection Division (EPD) has completed its review of the Voluntary Remediation Program (VRP) application, received by EPD on March 6, 2014, and submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100, *et seq.* In our letter of April 23, 2014, we notified Lebow Land Company, LLC, and 78 Milton, LLC, that the application has been conditionally approved. We have provided additional comments below.

In the upcoming Compliance Status Report (CSR), to be submitted to EPD by October 23, 2014, please provide:

1. An analysis, from previous work on site, demonstrating that stained subsurface soils on the properties adjoining Tract 4 are within residential RRSs. In the Prospective Purchaser Compliance Status Report (PPCSR) of July 2006, approved by EPD in our letter of August 6, 2006, Tract 4, which is part of HSI site number 10264 and which is located at 78 Milton Avenue, was certified as being within Type 2 risk reduction standards (RRSs) for soil. Of the qualifying properties specified within the current VRP application, we note that only Tract 4 was so certified. During soil excavation on Tract 4 conducted prior to submittal of the PPCSR, EPD representatives observed stained soil within excavations walls that bordered adjoining properties. Accordingly, EPD is concerned that soil exceeding residential (Type 1 or 2) RRSs may be present in the subsurface soils bordering the U.S. Plating site.
2. RRS calculations and sources for values used in those calculations for every regulated substance addressed in the VRP application.
3. Data to accompany all data points specified on the figures included with the VRP application. Several points designated as soil-boring locations had no data to support them. Please include tables and laboratory reports, where applicable.
4. A table listing the delineation standards for each constituent of concern in soil and groundwater on site, pursuant to Section 12-8-108(1) of the VRP Act.

5. A tax map or plat indicating the tax identification number of each parcel on site and of every property abutting the site.
6. A detailed narrative of protocols utilized during the most recent groundwater-sampling event. The narrative should include detailed information on sampling equipment, collection techniques, sample handling/preservation, and decontamination procedures.

Proper groundwater-sampling methodology must be followed, or EPD may disallow groundwater-analytical results and require resampling. The groundwater-sampling methodology required by EPD is specified in the USEPA Region 4 Field Branches Quality System and Technical Procedures, Science and Ecosystem Support Division (SESD OPs), "Procedure SESDPROC-301-R3, Groundwater Sampling," effective date March 6, 2013. The SESD OPs, which can be accessed on the Internet at <http://www.epa.gov/region4/sesd/fbqstp/>, supersede the USEPA "Environmental Investigations Standard Operating Procedures and Quality Assurance Manual", November 2001.

7. Field logs for the most recent groundwater-sampling event. Note that on all groundwater-sampling field logs, the depth to the tube or pump intake should be included. When conducting low-flow sampling or micropurging, the pump intake should be positioned in the middle of the screened interval, whereas with a traditional multi-volume purge, the pump intake should be positioned near the top of the water column. Field logs should also include the field-measured groundwater-stabilization parameters obtained prior to sampling. Turbidity in groundwater samples should be less than 10 NTUs whenever possible. Low turbidity is especially important in groundwater samples that will be undergoing metals analysis.

Lebow Land Company, LLC, AND 78 Milton Avenue, LLC, will need to 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 Lebow Land Company, LLC, AND 78 Milton Avenue, LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve Lebow Land Company, LLC, AND 78 Milton Avenue, LLC, from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Allan Nix at (404) 657-8600.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: Brent Cortelloni, Environmental Management Associates (via email)  
File: HSI Site Number 10264