



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

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July 31, 2018

VIA U.S. MAIL AND E-MAIL

City of Atlanta
Department of Watershed Management
c/o Mr. Todd Hill, P.E., Deputy Commissioner
72 Marietta Street, NW
Atlanta, Georgia 30303

Subject: Voluntary Remediation Program
5th - 6th Semi-Annual Status Reports
310 Vine Street, (aka) Mims Park/Rodney Cook Senior Park
Atlanta, Fulton County, Georgia

Dear Mr. Hill:

The Georgia Environmental Protection Division (EPD) has reviewed the 5th Semi-Annual Status Report dated November 13, 2017 and 6th Semi-Annual Status Report dated June 28, 2018 that were submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). These reports were received on November 30, 2017 and July 2, 2018, respectively. The 5th Semi-Annual Status Report provided a project update and responses to the EPD comment letter dated May 11, 2017. The 6th Semi-Annual Status Report provided the results of soil excavation and confirmation sampling activities. EPD has no objections to proceeding with construction activities. However, EPD has the following comments that should be considered, particularly with regard to the area along Walnut Street and the proposed backfill soil:

1. EPD finds that the as-built areas of soil excavation in the Main Remediation Area (MRA) and the Northwest Remediation Area generally correspond to the estimated excavation areas shown in the 4th Semi-Annual Status Report and that the soil confirmation sampling data presented meets the approved value of 400 mg/kg for lead-impacted soil, with the exception of several sidewall confirmation samples along Walnut Street (P1-SW, S1-SW, T1-SW, U1-SW, V1-SW-E (see comment 5.f. below), W1-SW, and X1-SW-E), which ranged from 430 – 1,200 mg/kg. EPD notes that, in order to certify that a Voluntary Remediation Property meets Risk Reduction Standards (RRS), it must be demonstrated in the Compliance Status Report that lead-impacted soil from historic fill material has been fully delineated on the property and that soil concentrations present on the Voluntary Remediation Property meet applicable RRS.
2. EPD acknowledges that initial borrow source sample results indicated that thallium exceeded its Type 1 RRS of 2 mg/kg in 2 samples, but that subsequent borrow source sampling which included 15 additional grab samples did not indicate that thallium exceeded its Type 1 RRS. If this borrow source is used for backfill soil, EPD recommends conducting periodic sampling of soil before it is transported to ensure that soil brought to the site for backfill does not contain regulated substances that exceed residential RRS.

3. Sidewall sample X2-SW is depicted on Figure 2; however, no accompanying confirmation sample results could be located on Table 3 or Appendix A of the report for EPD to confirm that this sidewall sample meets 400 mg/kg for lead.
4. One Page 2 of the report, it is stated that the MRA is contained within north-south grids J-GG & east-west grids 1-22. Based on our review, it appears that the MRA is contained within north-south grids I-GG, as sidewall sample I15-SW is depicted on Figure 2 of the report.
5. Based on a review of confirmation sample results (Table 3) and analytical testing data reports (Appendix A), several discrepancies were noted as follows which should be addressed:
 - a. The sample result for sidewall sample E19-SW-1.0 is shown as 6.3 mg/kg on Table 3; however, the analytical data report in Appendix A reports it as 36.3 mg/kg.
 - b. The sample designation for the floor sample in grid J9 is shown as J9-F-2.0 on Table 3; however, according to the analytical data report and accompanying chain-of-custody, the sample designation is reported as J9-F-1.0.
 - c. The sample designation for the sidewall sample in grid M20 is shown as M20-SW-2.0 on Table 3; however, according to the analytical data report and accompanying chain-of-custody, the sample designation is reported as M20-SW-1.0.
 - d. The sample designation for the sidewall sample in grid M21 is shown as M21-SW-2.0 on Table 3; however, according to the analytical data report and accompanying chain-of-custody, the sample designation is reported as M21-SW-1.0.
 - e. The sample designation for the sidewall sample in grid P22 is shown as P22-SW-2.0 on Table 3; however, according to the analytical data report and accompanying chain-of-custody, the sample designation is reported as P22-SW-1.0.
 - f. The sample designation for the sidewall sample in grid V1 is shown as V1-SW-2.0 on Table 3 as well as the analytical data report and chain-of-custody; however, on Figure 2, the sample designation is shown as V1-SW-E.

The above comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards, and policies of the Act. The next Semi-Annual Status Report is due by December 15, 2018. If you have any questions, please contact Will Lucas at (404) 656-3851 or via email at william.lucas@dnr.ga.gov.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

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