



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

---

**Land Protection Branch**

2 Martin Luther King, Jr. Drive  
Suite 1054, East Tower  
Atlanta, Georgia 30334  
404-657-8600

May 11, 2017

**Via U.S. Mail and Email**

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

Re: Voluntary Remediation Program  
1st - 4th Semi-Annual Status Reports  
310 Vine Street, (aka) Mims Park/Rodney Cook Senior Park

Dear Mr. Hill:

The Georgia Environmental Protection Division (EPD) has reviewed the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> Semi-Annual Status Reports that were submitted pursuant to the Georgia Voluntary Remediation Program Act. The Voluntary Remediation Program (VRP) Semi-Annual Status Reports are dated January 2016, July 2016, December 2016, and April 2017, respectively. Within the 4<sup>th</sup> Semi-Annual Status Report, there are several proposed modifications to the original Voluntary Investigation and Remediation Plan that EPD approved in June 2015. EPD agrees with a majority of the proposed modifications, but has the following comments:

1. EPD currently recommends floor confirmation sampling at an interval of one per 625 ft<sup>2</sup> rather than the one per 1000 ft<sup>2</sup> as proposed in the report.
2. In addition, EPD would request that additional sidewall samples be collected if excavation exceeds five (5) ft of depth. EPD's current recommendation is that one sample should be collected every twenty five (25) linear feet along the perimeter of the sidewalls of the excavation, for every five (5) feet of depth within the zone of contamination. This would not apply to depths that are below the groundwater table.
3. For excavations with sidewall perimeters that are not multiples of 25 ft, depths that are not multiples of 5 ft, and floor areas that are not multiples of 625 ft<sup>2</sup>, the sidewall, depth, and floor dimensions should be carried up to the next greatest multiple to determine the number of samples needed.

Please address these comments in the next Semi-Annual Status Report, which is due by December 15, 2017, or include them in the VRP Compliance Status Report if submitted prior to the next Semi-Annual Status Report due date.

310 Vine Street  
May 11, 2017  
Page 2 of 2

If you have any questions, please contact Bill Williams at 404-232-1502.

Sincerely,



David Hayes  
Unit Coordinator  
Response and Remediation Program

C: Cory Rayburn, City of Atlanta (via email)  
Kristina Garcia, City of Atlanta (via email)  
Dustin Heizer, Amec Foster Wheeler (via email)  
Chuck Ferry, Amec Foster Wheeler (via email)

File ID: 261-0960 (VRP1421176276)

S:\RDRIVE\BWILLIAMS\HSI\Mims Park VRP\Progress Reports 1-4 comments.docx