

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

March 18, 2016

VIA EMAIL & REGULAR MAIL

I. S. Liquidation, LLC
c/o Mr. Stephen Chapman
13048 Knaus Road
Lake Oswego, OR 97034

Re: January 2016 Voluntary Remediation Program Application
Former I. Schneid Facility, HSI # 10753
Atlanta, Fulton County, Georgia

Dear Mr. Chapman:

The Georgia Environmental Protection Division (EPD) has received the January 16, 2016, Voluntary Remediation Program (VRP) Application, that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, on behalf of I.S. Liquidation LLC by Environmental Resources Management (ERM). After completing its review of the application and visiting the site on February 25, 2016, EPD has prepared the following comments:

- 1) According to Section 12-8-108(2) of the Act, a site specific exposure pathway shall be considered complete if there are no discontinuities from the source of the release to the receptor. Based on the site conditions and the data provided, the groundwater to surface water exposure pathway is potentially complete for the downgradient Woodall Creek. Please revise future VRP documentation accordingly and include a discussion of the fate and transport potential of the dissolved phase impacts reaching this receptor at concentrations above the human health and ecological criterion. Modeling may be used to demonstrate compliance at the point of exposure (i.e., Woodall Creek).
- 2) Section 6.8 of the VRP Application states that any risk associated with vapor intrusion will be effectively managed through the use of a Uniform Environmental Covenant (UEC) that will be placed on the property, including the incorporation of vapor mitigation measures into the site renovation & redevelopment plan. In accordance with the exposure pathway definition listed in Comment (1) above, the VRP Application must state that the vapor intrusion pathway is potentially complete due to the presence of volatile organic compounds and light non-aqueous phase liquids in the groundwater onsite. In addition, please clarify how the activity limitations for the proposed UEC will be developed without first determining if the remnant source material and associated dissolved phase impacts currently pose or will pose an imminent or substantial danger to human health in regards to the vapor intrusion exposure pathway.
- 3) Section 7.0 of the VRP Application indicated that the removal of the free phase source material detected in groundwater monitoring wells MW-19 and MW-20 would be impractical. In accordance with Section 12-8-108(9) of the Act, the site must demonstrate not only that remediation beyond the point of technical impracticability (i.e., less than 0.01-ft. of free phase source material) is not needed but also that no imminent or substantial danger to human health and the environment exists. Considering that greater than 0.01-ft. of source material has been found in the two above referenced monitoring locations, EPD recommends that a passive

practical remedial measure be employed, such as absorbent socks or a similar remedial technology, in the source area until such time that the site has complied with the requirements of the VRP and been removed from the Hazardous Site Inventory.

- 4) The following comments pertain to technical/clerical issues noted within the VRP Application:
- a. Please either revise an existing Figure or provide a new Figure (i.e., Property Ownership Map) to include the property use description and owner information for all abutting properties.
 - b. Revise the cross section Figures 6-2 and 6-3 so that the orientation of the cross section passes through the source area. The figure should also be used to illustrate vertical delineation in the source area and horizontal delineation in the predominant groundwater flow direction.
 - c. Appendix A includes property descriptions for two parcels encompassing 1.542 acres and 4.748 acres, yet the tax parcel and VRP Application for the qualifying property list the property size as 3.09 acres. Please provide additional information to clarify this discrepancy.
 - d. Please revise the "Projected Milestone Schedule" in Section 8 of the Application to include the submittal of semi-annual VRP progress reports and/or the final VRP CSR in accordance with Sections 12-8-107(b)&(e) of the Act.

I.S. Liquidation 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 submitted by I.S. Liquidation, LLC.

Please ensure that the above listed comments are addressed and documented in accordance with the updated schedule required in accordance with Comment (4)(d) above. Should you have any additional questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 657-8660.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

cc: Jeffrey Bilkert, ERM
Mr. Michael Thomas, Fairmont Flats, LLC
File: VRP – Former I. Schneid Facility Site #10753