



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

January 23, 2019

VIA E-MAIL AND U.S. MAIL

Bright Hour Trust
c/o Mr. Gerald L. Pouncey, Jr.
3343 Peachtree Road NE
Atlanta, Georgia 30326

Re: Bright Hour Trust Property – HSI # 10894
Third Semi-Annual VRP Progress Report and Supplemental Report
340 Armour Drive
Atlanta, Fulton County, Georgia

Dear Mr. Pouncey:

The Georgia Environmental Protection Division (EPD) has reviewed the 3rd Semi-Annual Progress Report (3rd SAPR) dated November 19, 2018 and the Semi-Annual Progress Supplemental Report (Supplemental SAPR) dated January 9, 2019 which were submitted for the above referenced site pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has the following comments, which should be addressed in accordance with the Act:

1. EPD finds the proposed fencing to be an acceptable engineering control for limiting access to the proposed restricted area portion of the Conservation Property. EPD agrees that soil has been adequately delineated to the west and south on the Conservation Property. EPD understands that the fenced area will extend to the northern property boundary.
2. Comments on Soil Delineation:
 - a. As noted in Section 3.0 of the progress report, additional vertical delineation of metals is needed.
 - b. The soil sampling data presented on the delineation figures generally do not support the isoconcentration lines depicting that delineation criteria have been met, particularly on the Bright Hour Trust property. Isoconcentration lines depicting concentrations below the delineation criteria should be drawn through sample locations with results below the delineation criteria.
 - c. Soil delineation maps only show the 0 – 2 feet bgs interval. Horizontal delineation for impacts below two feet will also need to be demonstrated.
 - d. Please include silver on soil delineation maps.
3. EPD understands that additional lines of evidence will be presented to support the demonstration that soil is protective of VRP leaching criteria.
4. The Type 1 and 3 Risk Reduction Standards presented in Tables 1 and 2 are acceptable for use at the site.

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 progress report is due by June 30, 2019. If you have any questions regarding this matter, 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

cc: James Sochovka, Key Investments, Inc. (via email) <jskey@comcast.net>
Mike Haller, Sailors Engineering (via email) <mike@sailors-engineering.com>

File: 261-0594 (C082), VRP

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