



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

August 27, 2018

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
Second Semi-Annual VRP Progress Report
340 Armour Drive
Atlanta, Fulton County, Georgia

Dear Mr. Pouncey:

The Georgia Environmental Protection Division (EPD) has reviewed the 2nd Semi-Annual Progress Report (2nd SAPR) dated July 2, 2018 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. Comments on Delineation:

- a. Based on a review of information presented in the 2nd SAPR, as well as the VRP Application and the 1st SAPR, delineation of all constituents of concern (COCs) have not yet been achieved to applicable criteria (i.e., residential RRS – either default Type 1 RRS or site-specific Type 2 RRS (as applicable)). It will be necessary to demonstrate that the VRP delineation criteria are met for soil both horizontally and vertically.

Although a table (Table 1 of the 1st SAPR) of delineation standards has been previously provided, please update this table as part of future reports to include applicable delineation criteria (i.e., either default Type 1 RRS or site-specific Type 2 RRS) for EPD risk review and approval.

- b. Soil Impact Maps. Once delineation has been completed as referenced in Comment 1.a. above, a series of Soil Impact Maps for both the surficial interval (i.e., 0-2 feet) and deeper intervals (i.e., > 2 feet) should be presented as part of ongoing reporting to demonstrate that delineation has been achieved to applicable criteria. Isoconcentration contour lines should be depicted on associated maps with the outermost contour line being the Type 1 RRS (or Type 2 RRS as applicable) for a particular COC, while inner isoconcentration contours should be based on the analytical data findings for discrete sample locations.

2. Comments on Risk Reduction Standards:

- a. Although numerous COCs have been historically reported at concentrations exceeding laboratory detection limits; to date, RRS calculations have only been provided for a select number of COCs including:
 - i. Barium, Benzo(a)Pyrene, and Benzo(b)Fluoranthene as presented in Appendix 4 of the 1st SAPR; and
 - ii. Arsenic, Barium, and Lead as presented in Appendix 4 of the 2nd SAPR.

Please provide RRS calculations for all COCs which have historically been reported at concentrations exceeding laboratory detection limits for EPD risk review and approval. This includes mercury, selenium, and silver, which are indicated in the narrative on page 3 of the 2nd SAPR as meeting the greater of Type 3 or 4 RRS on the Conservation Property.

- b. Exposure Factors for a Youth Trespasser:
 - i. The exposure factors presented in Table 6 are not reflective of a typical youth trespasser. Please recalculate the site-specific RRS using the following recommended exposure factors:

Body weight – 45 kg
Exposure frequency – 90 days/year
Soil Ingestion Rate – 100 mg/day
Exposure duration – 10 years
- c. The Risk Assessment Unit reviewed the computed 95% UCL results for Arsenic, Barium, and Lead and the statistical methodology and results are acceptable for comparison to the site-specific Type 4 soil RRS.
- d. It will still need to be demonstrated that the proposed corrective action, including the site-specific RRS for the Conservation Property, will be protective of VRP soil leaching criteria.

3. Corrective Action Measures Comments. The following comments are based on a review of Section 5.2 Additional Corrective Action Measures:

- a. It is noted that engineering controls will include the placement of at least 6-inches of concrete in those areas of the Bright Hour Trust Property that exceed the Type 3 or 4 RRS which currently are not covered by concrete and that Figure 1 depicts the areas that will receive additional concrete cover. EPD notes that Figure 1 does not depict any areas of concrete cover on the Bright Hour Trust Property and that this figure should be updated similar to Figure 7 of the VRP Application (after the completion of delineation activities) as part of ongoing reporting activities.

- b. It is noted that a fence will be erected around the perimeter of the Restricted Area on the Conservation Property to limit the potential for long-term, continuous access to the area by maintenance workers and/or trespassers, and that restrictions will be documented in a Uniform Environmental Covenant. EPD understands that the fence will extend to the property boundary along the north side of the Conservation Property.

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 December 30, 2018. If you have any questions regarding this matter, please contact Will Lucas of the Response and Remediation Program at (404) 656-3851.

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