

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

January 29, 2015

VIA E-MAIL AND REGULAR MAIL

Selig Enterprises, Inc.
c/o Mr. S. Kevin Curry
1100 Spring Street, Suite 550
Atlanta, Georgia 30309

FILE COPY

Re: VRP 1st 2014 Semi-Annual Progress Report, April 11, 2014
VRP 2nd 2014 Semi-Annual Progress Report, November 14, 2014
Spalding Corners Shopping Center, HSI Site No. 10639
7700 Spalding Drive, Norcross, Fulton County, Georgia
Tax Parcels 06-0313-LL0091 and 06-0313-LL0349

Dear Mr. Curry:

The Georgia Environmental Protection Division (EPD) has reviewed the April 11, 2014 and November 14, 2014 Progress Reports (Reports) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has noted that considerable investment has been made by Selig Enterprises in the mitigation and remediation of the site. However, additional work is required prior to submission of a Compliance Status Report (CSR). Our comments are provided below:

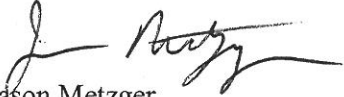
1. EPD's January 10, 2014 letter noted that downgradient parcel 06-0313-LL0364 has not been adequately addressed. The subsequent reports suggest that since overall site concentrations are declining and MW-22S was non-detect, no further action is required for that parcel. However, the reports fail to demonstrate that groundwater beneath the downgradient parcel will not eventually be impacted above Type 2 RRS. Sailors Engineering Associates is unable to calibrate the REMChlor model, the SourceDK results do not estimate the extent of plume migration, concentrations are increasing at the leading edge of the plume, and there is little evidence of MNA. Therefore, Selig Enterprises should propose an ongoing groundwater monitoring plan in the next report, which will be implemented subsequent to delisting, to ensure that groundwater exceedances will not migrate onto this property.
2. EPD has noted a number of issues with the draft uniform environmental covenants (UECs) for the two parcels provided in the November 2014 Report. These issues can be addressed informally and EPD will send comments and proposed revisions to the draft UECs via email. It should be noted that EPD may require ongoing monitoring at the site to be included in UECs.
3. The Vapor Intrusion Assessment for existing structures on Parcel 06-0313-LL0091, included in the April 2014 Report, was based on the March 2014 sample that indicated a PCE concentration at MW-15s of 0.025 mg/L. This appears to be an anomalous sample considering the previous and subsequent samples at MW-15s had PCE concentrations of 0.340 mg/L and 0.200 mg/L, respectively. Please update the Vapor Intrusion Assessment using more representative sampling data.

4. No Vapor Intrusion Assessment has been provided for future structures on Parcel 06-0313-LL0349 and the potential vapor intrusion pathway was not addressed in the draft UEC provided in the November 2014 Report. This potential pathway must be addressed, so draft language will be included in EPD's comments on the proposed UECs.
5. Sampling procedures have not universally adhered to EPA low-flow sampling guidance SESDPROC-301-R3 and previous EPD comments. Specifically, note purging and stabilization procedures (especially related to turbidity) and placement of pump intake in the screened interval. EPD may require resampling if there are further unexplained sampling procedure discrepancies.
6. EPD has concerns with the use of MW-22S as a delineation well. The well is installed with screen extending only approximately 1.2 feet into the saturated zone and sampling logs reveal it to have very low yield. Thus, it is unlikely to provide truly representative samples of downgradient groundwater conditions. This well may need to be replaced depending on results of further monitoring at the site.

Selig Enterprises 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 documents submitted by Selig Enterprises. However, failure of EPD to respond to a submittal within any timeframe does not relieve Selig Enterprises from complying with the provisions, purposes, standards and policies of the Act.

The next progress report, or CSR if the above requirements are met, is due by April 12, 2015. It should be noted that the approved 5-year Voluntary Remediation Program schedule requires that a CSR be submitted by October 2015. If you have any questions, please contact Jake Carpenter at (404) 657-8656.

Sincerely,


Jason Metzger
Unit Coordinator
Response and Remediation Program

c: Michael J. Haller, P.G., Sailors Engineering Associates, Inc.