



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

February 18, 2019

Berkeley Lake Village Owners Association
c/o Mr. Hank Chang
Community Management Associates
1465 Northside Drive, Suite 128
Atlanta, Georgia 30318

Re: Fifth Semi-Annual Progress Report dated December 22, 2017
Sixth Semi-Annual Progress Report dated June 28, 2018
Seventh Semi-Annual Progress Report dated January 15, 2019
Berkeley Lake Village Owners Association, HSI # 10844
3351 North Berkeley Lake Road
Duluth, Gwinnett County, Georgia

Dear Mr. Chang:

The Georgia Environmental Protection Division (EPD) has reviewed the referenced progress reports submitted pursuant to the Georgia Voluntary Remediation Program (VRP) Act, O.C.G.A. 12-8-100, for the referenced site. The progress reports were submitted on behalf of the Berkeley Lake Village Owners Association (BLVOA) by Ramboll US Corporation (Ramboll). After completing a review of these reports, EPD has the following comments:

1. In the referenced reports BLVOA has not provided certification that one or more professionals has overseen the implementation of the voluntary investigation and remediation plan, as required under subparagraph 12-8-107(b) of the VRP Act and as stipulated in BLVOA's VRP Application. This certification should be provided in the next progress report.
2. Based on EPD's review of the progress reports, it is EPD's understanding that BLVOA's future activities include preparing a human health risk assessment, evaluating the removal and/or capping of soil with elevated arsenic concentrations, generating a groundwater potentiometric map to better understand groundwater movement in the area, and considering site specific soil criteria (area averaging).

EPD has no objections with these proposed activities and awaits the results of BLVOA's findings in future progress reports. Additionally, EPD expects that all previous comments regarding arsenic in vitro bioaccessibility (IVBA), arsenic relative bioavailability (RBA), area averaging, uniform environmental covenant development, etc. will be addressed in future progress reports.

3. In the project schedule presented in the April 2015 VRP Application, BLVOA proposed to submit a Compliance Status Report by April 16, 2018. An updated Milestone Schedule should be submitted to EPD and included with your next progress report.

VRP 5th, 6th, and 7th Semi-Annual Progress Reports
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The above listed comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Please provide a response to the above listed comments as part of the next scheduled Progress Report submittal no later than June 30, 2019.

If you have any questions regarding this matter, please contact Gordon Terhune at (404) 657-0492.

Sincerely,

A handwritten signature in blue ink that reads "David Hayes".

David Hayes
Unit Coordinator
Response and Remediation Program

c: Robert Patchett, PG, Ramboll (rpatchett@ramboll.com)

File: VRP – Berkeley Lake Village Owners Association, File ID #226-0342, HSI # 10844

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