

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334

Reply To:

Response and Remediation Program
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Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

Chris Clark, Commissioner
Environmental Protection Division
F. Allen Barnes, Director
Land Protection Branch
Mark Smith, Branch Chief

December 6, 2010

VIA E-MAIL AND REGULAR MAIL

Mr. Henry Wirth
F.S. Associates, L.P.
c/o Mr. Scott Laseter
Kazmarek Geiger & Laseter LLP
One Securities Center, Suite 201
3490 Piedmont Rd NE
Atlanta, Georgia 30305

Re: Revised Voluntary Remediation Plan Application, October 2010
Hunting Creek Shopping Plaza, HSI Site No. 10832
Conyers, Rockdale County, Georgia
Tax Parcel ID: 075001034A

Dear Mr. Wirth:

The Georgia Environmental Protection Division (EPD) has reviewed the October 8, 2010, Voluntary Remediation Plan Application submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has the following comments:

Conceptual Site Model:

- 1) Section 5.2.1 of the application states the potential for direct exposure to impacted soil is incomplete. This is incorrect. The pathway is complete because contamination above background is being left in place; however, the concentrations meet Type 1 Risk Reduction Standards (RRS) and are acceptable for residential use. Please revise.

Source:

- 2) Comment 3 of EPD's September 13, 2010 letter discussed further source investigation. Revised section 6.2 states potential releases from the sewer line were addressed by the chemical oxidation treatments of the surrounding soil. In the event data indicates the possibility of source material, EPD may request additional source investigation.

Groundwater:

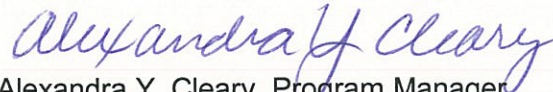
- 3) As was stated in EPD's September 13, 2010 letter, EPD does not agree that monitoring well MW-3 completes vertical delineation of the groundwater contaminant plume.

F.S. Associates, L.P. 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 F.S. Associates, L.P. However, failure of EPD to respond to a submittal within any timeframe does not relieve F.S. Associates, L.P. from complying with the provisions, purposes, standards and policies of the Act.

Mr. Henry Wirth
Hunting Creek Shopping Plaza
December 6, 2010
Page 2

If you have any questions, please contact Kristen Ritter Rivera of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Alexandra Y. Cleary, Program Manager
Response and Remediation Program

c: Charles T. Ferry, MACTEC
Hunting Creek Retail LLC

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