

Georgia Department of Natural Resources

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Reply To:
Response and Remediation Program
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Mark Williams, Commissioner
Environmental Protection Division
F. Allen Barnes, Director
Land Protection Branch
Mark Smith, Branch Chief

May 20, 2011

VIA EMAIL & REGULAR MAIL

FILE COPY

Coats & Clark Inc.
c/o Mr. Mike Bell
374 Coats Drive
Toccoa, Georgia 30577-7986

Re: January 2011 Voluntary Investigation and
Remediation Plan Application
Coats & Clark Inc., HSI Site No. 10630
506 West Doyle Street, Toccoa, Georgia
Tax Parcel ID R583800 T10 005

Dear Mr. Bell:

The Georgia Environmental Protection Division (EPD) has reviewed the January 31, 2011, revised Voluntary Investigation and Remediation Plan (VIRP) application that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. EPD has noted the following concerns that need to be addressed:

- 1) The next semi-annual Progress report should indicate the status of all wells and confirm that any destroyed wells were properly abandoned. Please note that monitoring wells should be abandoned in accordance with Section 2.8 of the EPA Region 4 Science and Ecosystem Support Division (SESD) Operating Procedure No. SESDGUID-101-R0 (Design and Installation of Monitoring Wells). Should monitoring well MW-8 not be able to be utilized to demonstrate delineation at/beyond the qualifying property boundary, EPD reserves its rights to require that this well be replaced to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Should there be any impacts to the groundwater beneath these offsite residential properties, it may be necessary to include these properties in the vapor migration pathway analysis, and also include them as qualifying properties with the placement of an environmental covenant to comply with the provisions, purposes, standards and policies of the Act.
- 2) No point of demonstration (POD) wells were established in the January 2011 VIRP application. Please evaluate and clarify further the POD wells in the next Progress Report. In addition, please note that the January 2011 VIRP application establishes a point of exposure (POE) as the creek on the downgradient portion of the subject property. Please ensure that a POD well is established for this POE.
- 3) According to the January 2011 VIRP application, a hypothetical point of drinking water exposure located 1000-ft downgradient from the delineated contaminant plume will be used as the groundwater point of exposure. Please note that this POE is located off the qualifying property.

Therefore, it may be necessary to include the downgradient City of Toccoa property as a qualifying property along with placement of an environmental covenant to comply with the provisions, purposes, standards and policies of the Act. Please evaluate and clarify further the POE and POD well for this pathway in the next Progress Report.

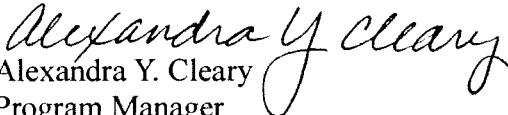
- 4) Since the site includes a commercial rental unit(s) with an associated contract(s) for the tenant(s), please ensure that the UEC includes a stipulation that each rental agreement associated with the property will include the necessary use restrictions to meet the risk reduction standards for the site.
- 5) Please ensure that future semiannual progress reports highlight or bold all groundwater data that is above the Type 1-4 risk reduction standards that were established in the approved April 15, 2009 Revised Corrective Action Plan. In addition, future surface water samples must be collected during low flow periods and analyzed with detection limits set at or below the established in-stream water quality standard, and documented by a table in the semiannual progress reports.

EPD recommends that some key items, e.g. modeling results, be submitted well in advance of the compliance status report (CSR) submittal to ensure compliance with the Act.

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. EPD may, at its sole discretion, review and comment on documents submitted by Coats & Clark Inc. However, failure of EPD to respond to a submittal within any timeframe does not relieve Coats & Clark Inc. from complying with the provisions, purposes, standards, and policies of the Act.

Should you have any question or concerns, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 657-8600.

Sincerely,


Alexandra Y. Cleary
Program Manager
Response and Remediation Program

c: James VanderWoude, Toccoa Renaissance, LLP
File: VIRP Application 965147780 – Coats & Clark Inc.