

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1066 East, Atlanta, Georgia 30334

Reply To:
Response and Remediation Program
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Office 404/657-8600 Fax 404-657-0807

Mark Williams, Commissioner
Environmental Protection Division
Judson H. Turner, Director
Land Protection Branch
Keith M. Bentley, Chief

July 31, 2012

VIA EMAIL & REGULAR MAIL

MAILED

8-1

Legacy Vulcan Corporation
c/o Mr. Carleton Degges
1200 Urban Center Drive
Birmingham, Alabama 35242
205-298-3063

Re: January 2012 Voluntary Remediation Plan Application
Former Vulcan Performance Chemicals, HSI #10770
Dalton, Whitfield County, GA
Tax Parcel ID 13-044-09-000

Dear Mr. Degges:

The Georgia Environmental Protection Division (EPD) has received the January 27, 2012, Voluntary Remediation Program application that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by the Johnson Company on behalf of Legacy Vulcan Corporation (Vulcan). After completing its review of the application, EPD has prepared the following comments:

Preliminary Remedial Action Plan:

- 1) According to the Application, monitored natural attenuation (MNA) has been proposed as the primary corrective action at the site to achieve environmental closure within 5-years for the detections of lead in groundwater. Rather than continue with the proposed semi-annual monitoring plan for an undetermined timeframe over the next 5-years, EPD suggests that Vulcan consider enacting engineering controls in the form of an environmental covenant on the property and subsequently submit the final CSR.

Conceptual Site Model:

- 2) Please provide a specific indication of which monitoring location(s) will be used as the point of demonstration (POD) monitoring location for an actual Point of Exposure (POE) or an established hypothetical POE for groundwater.

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

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Should you have any additional questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



David Brownlee
Acting Program Manager
Response and Remediation Program

c: Daniel McDonnell, Haley & Aldrich, Inc.
Douglas E. Cloud, Mowrey, Meezan, Coddington, & Cloud LLP
James Grantham, Harcos Chemicals, Inc.

File: VRP Application 1063742872 – Former Vulcan Performance Chemicals Site #10770

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