

# 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

Mark Williams, Commissioner  
Environmental Protection Division  
Judson H. Turner, Director  
Land Protection Branch  
Mark Smith, Branch Chief

March 9, 2012

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## VIA E-MAIL AND REGULAR MAIL

Michael Brom, Director Environment  
PCS Joint Venture, Ltd.  
1101 Skokie Blvd, Suite 400  
Northbrook, IL 60062

Re: Voluntary Remediation Plan Application, December 9, 2011  
Farmer's Favorite Fertilizer, HSI Site No. 10259  
315 4<sup>th</sup> Avenue  
Moultrie, Colquitt County, Georgia  
Tax Parcels M033-033, M034-001, M023-199, M033-032, M033-034, N024-215, and  
M024-214

Dear Mr. Brom:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (Act) O.C.G.A. §12-8-100 et seq. EPD has noted the following deficiencies:

1. The HSI number on the application is incorrectly stated as 10254. It should be 10259. Please send a replacement page 2 of the application with this correction. Also, please correct the zip code on that same page to 31768. The 31776 zip code you have used is for post office box addresses in Moultrie.
2. The warranty deed for the land parcel with Tax Parcel ID M033-032 is not included in the package. The table labeled Appendix A-2 indicates that this parcel is included in the warranty deed dated 1/15/92 and is referred to as Parcel #4 of Exhibit "A" attached to that deed, but Parcel #4 describes Tax Parcel M033-033. Parcel #5 of Exhibit "A" also appears to be a part Tax Parcel M033-033. None of the deeds included in the package refer to the parcel(s) that make up Tax Parcel M033-032. Forward a copy of the warranty deed for this parcel.
3. Include written consent for entering adjoining properties and performing corrective action, including, where necessary, the execution of restrictive covenants, for all adjoining parcels known to be impacted by the release. In particular, provide consent for these parcels: M034-003, M034-005, M034-007, M034-078, and M034-079.

### **Voluntary Investigation and Remediation Plan**

1. This site has never been certified as in compliance with risk reduction standards for soils. In a May 29, 2009 letter, EPD noted three issues related to soil contamination remaining at the site that must be addressed during implementation of the Groundwater Monitoring Plan. Therefore, these issues must be addressed in the VIRP.
2. Add nitrate, phosphate, and sulfate to the list of analytes for at least one round of monitoring, then address whether these anions should be added to the list of COCs.
3. In Section 4.1.3, Purging Methods, include a reference to EPA Region 4's Science and Ecosystem Support Division Operating Procedures, SESDPROC-301-R2, October 28, 2011, indicating that as the basis of purging procedures. Also, update the reference given in Section 4.1.5, Groundwater Sampling, to this more recent version. Please send updated pages and we will insert them in the VIRP application.
4. In Section 4.8, Draft Environmental Covenant, please include a reference to the model environmental covenant found on EPD's website at: [http://www.gaepd.org/Files\\_DOC/forms/hwb/modelcovenant.doc](http://www.gaepd.org/Files_DOC/forms/hwb/modelcovenant.doc) Please send updated page(s) and we will insert them in the VIRP application.

PCS Venture, Ltd. must address the above 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 PCS Venture, Ltd. However, failure of EPD to respond to a submittal within any timeframe does not relieve PCS Venture, Ltd. from complying with the provisions, purposes, standards, and policies of the Act. EPD reserves all rights to require groundwater monitoring pursuant to Section 12-8-107(g)(2) of the Act.

Should you have any question or concerns regarding this matter, please contact Mr. Terry Allison of the Response and Remediation Program at (404) 657-8664.

Sincerely,



David Brownlee  
Acting Program Manager  
Response and Remediation Program

c: ✓Jeffrey R. Wagner, URS

File: VIRP Application – PCS Venture, Ltd.; Farmers Favorite Fertilizer