

August 21, 2017

Mr. Kyle Phelps
Capital City Bank
1301 Metropolitan Boulevard
Tallahassee, Florida 32308

Re: Semi-Annual VRP Progress Report No. 4
HSI # 10912
Grantville Mill Property
41 Industrial Way
Grantville, Coweta County

Dear Mr. Phelps:

The Environmental Protection Division (EPD) is in receipt of the July 2017 VRP Progress Report (Report) for the Grantville Mill Property, in Grantville, Coweta County. After completing a review of this report, EPD has prepared the following comments:

- 1) Delineation of arsenic (As) is not complete to Type 1 or Type 2 risk reduction standards (RRS) or to a concentration reflective of background concentrations to the northwest of S-1 and northwest of S-22. Additionally, benzene at S-2 and lead at S-1 do not meet Type 1 or Type 2 RRS or background levels. While delineation is not currently complete, EPD will allow it to be accomplished during remediation activities.
- 2) The proposed RRS values are acceptable with the exception of chromium. Chromium RRS values should be separated into trivalent and hexavalent forms. However, the available data for total chromium does not warrant speciation at this time.

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 responses to the above listed comments as part of the next scheduled Progress Report submittal. If you should have any questions regarding this matter, please call Tom Brodell of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Kirk Kessler, EPS <kkessler@envplanning.com>

File: HSI # 10912

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