

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

August 19, 2011

VIA EMAIL AND REGULAR MAIL

Newnan Lofts Limited Partnership
c/o Mr. James R. Borders
817 West Peachtree Street NW, Suite 400
Atlanta, Georgia 30308

Re: April 2011 Revised Voluntary Remediation Plan
Newnan Lofts Apartment Complex
110 Field Street, Newnan, Coweta County, Georgia
Tax Parcel ID N15 0001 001

Dear Mr. Borders:

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

- 1) One of the proposed corrective actions included in the application states that, “in the undeveloped portion of the site (northern fenced area), ensure that any soils in the upper 2-feet of the soil horizon with average concentrations of PAHs or metals that exceed Type 1 risk reduction standards (RRS) are covered with a minimum of 2-feet of clean imported soil to meet the Type 5 RRS.” Please revise this corrective action to indicate that soils in upper 2-feet in exceedance of the Type 1 RRS, determined through area averaging, will be excavated and placed in the designated Type 5 RRS containment area located in the northern fenced area.
- 2) The application must provide a clear description of all properties that will be included as qualifying properties in the application, including additional details associated with the leased CSX property along with a supporting site figure that illustrates the extent of this leased property and any other qualifying properties.
- 3) Please clearly illustrate all Type 5 RRS compliance areas on a site figure, including a designation of the Type 5 RRS containment area where the excavated soils will be placed and covered in the undeveloped, fenced area of the site.
- 4) The plan proposes to excavate soils exceeding Type 1 RRS based on average concentrations in soil across the site, however the plan did not specifically indicate how the soil averaging would be calculated. Please clarify the criteria that will be used to determine the extent of soil excavations within the upper two-feet for the designated accessible areas.

As indicated in previous correspondences, the documentation for establishing the exposure domains should be presented to EPD for approval and take into consideration the current and future land use at the properties. It should also be noted that the areas exceeding applicable risk reduction standards (RRS) have yet to be fully delineated in many areas on the qualifying property and this would likely need to occur before any area averaging could be done (Section 12-8-108 of the Act).

- 5) Please ensure that the extent of offsite contamination south of Area 1, and any other potential offsite impacts are defined within the established 2-year timeframe.
- 6) Please ensure that the future “Supplemental Sampling” includes a sufficient amount of sample locations necessary to meet the data quality objectives of the proposed area averaging criteria, and sufficient enough to complete the horizontal and vertical delineation requirements for the regulated substances onsite and offsite [Ref. Comment (4) & (5)]. In addition, please include soil/sediment, and surface water samples, if applicable, from the surface water drainage ditch located in the northwestern corner of Area 2, proximal to the Pool Area.
- 7) Excavated soils will need to be tested to ensure that they are not characteristically hazardous before being consolidated under the impermeable cover or managed/disposed of offsite. Soils that fail testing (e.g., TCLP) will need to be treated prior to consolidation or otherwise disposed of off-site at a permitted disposal facility.
- 8) Upon the completion of the Supplemental Sampling and associated site remediation, please provide an additional cross section, perpendicular to the one provided on Figure 2.11, that illustrates the site’s surface and subsurface setting (Unified Soil Classification System subsurface soil descriptions and any interconnecting lithologic characteristics) to support the graphic three-dimensional conceptual site model required by Item #5 of the application checklist.

Risk Reduction Standards:

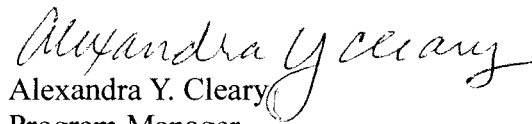
- 9) Type 1 Risk Reduction Standards for Soil – The Type 1 Risk Reduction Standards (RRS) for soil provided on Table C.1 are acceptable for use at the site. Please note that a value of 20 mg/kg based on the Appendix III, Table 2 value for the Type 1 RRS for arsenic is also acceptable.
- 10) Type 2 Risk Reduction Standards for Soil – The Type 2 RRS provided on Table C.1 are acceptable for use at the site.
- 11) Type 2 Risk Reduction Standards for Groundwater – The Type 2 RRS for groundwater provided on Table C.2 for chromium, VI is incorrect. The correct value should be 0.0017 mg/L based on the carcinogenic adult value. However, the calculated value is below the proposed detection limit; therefore, it should revert to the detection limit. Additionally, for non-volatile compounds the inhalation pathway does not need to be evaluated. Please revise Table C.2 accordingly.

- 12) Toxicity Factors and Chemical Specific Parameters – The values provided in the document are acceptable; however, the U.S. EPA Regional Screening Level (RSL) tables were updated in June 2011. The update did not affect the values provided in this document, but the references to the toxicity values and chemical specific parameters must be revised. Additionally, the current RSL user's guide provides the recommended Kd values for organic compounds.

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

Should you have any question or concerns regarding this matter, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 657-0488.

Sincerely,



Alexandra Y. Cleary
Program Manager
Response and Remediation Program

c: Chet Tisdale

File: VRP Application 1278434253 – Newnan Lofts Apartment Complex