

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

February 26, 2016

VIA U.S. MAIL AND E-MAIL

Rollins, Inc.
c/o Mr. Gary Rogers, Environmental Manager
2170 Piedmont Road, NE
Atlanta, Georgia 30324

Re: Comments on Voluntary Remediation Program Application
Dettelbach Pesticide Warehouse Site, HSI No. 10612
1251 Park Avenue, Atlanta, DeKalb County, Georgia

Dear Mr. Rogers:

The Georgia Environmental Protection Division (EPD) has reviewed the September 8, 2015 Voluntary Investigation and Remediation Plan (VIRP) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) as an application for entry into the Voluntary Remediation Program (VRP). In our letter dated February 26, 2016, that application was approved. In this letter, we are providing additional comments.

Comments

1. Additional vertical delineation is needed in the area of SB-61. The elevated detection of chlordane in the 5' interval requires additional investigation. Since this sample location is next to the retaining wall at the rear of the former Mexican Consulate building, there should be some evaluation of the possibility of contamination under the slab of the building.
2. Additional soil sampling will be needed in the vicinity of B-4, SB-14, and SB-32 to demonstrate horizontal delineation and to ensure that soil exceeding Risk Reduction Standards is either covered by the cap or excavated.
3. Soil excavations that occurred prior to submittal of the VIRP have not been documented and/or approved through submittals to EPD. An effort should be made to prepare and submit a comprehensive cleanup report that documents all of those excavations noted in Section 2.0, Page 2 of the VIRP. This should be submitted for approval well in advance of the final Compliance Status Report to ensure that EPD agrees that those areas are in compliance with the appropriate RRS.
4. A monitoring and maintenance plan will be needed to provide for periodic evaluation of the cap / retaining wall and reporting to EPD.
5. Clarification is needed regarding the current qualifying property identification information. Each qualifying property should be listed separately on the Voluntary Remediation Plan Form, which should include current tax parcel ID, address, and owner information. Please provide this information in the first semi-annual progress report.

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

If you have any questions, please contact Bill Williams of the Response and Remediation Program at (404) 657-7126.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: David Word, P.E. - Joe Tanner & Associates (via e-mail)
Kristen R. Rivera, P.G. - EarthCon Consultants, Inc. (via e-mail)

File: HSI # 10612

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