

Georgia Department of Natural Resources

Environmental Protection Division

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Judson H. Turner, Director

Land Protection Branch

Keith M. Bentley, Chief

Phone: 404-657-8600 Fax: 404-657-0807

April 11, 2013

VIA U.S. MAIL and EMAIL

Sobh Decatur Properties, LLC
c/o William B. Wood, Counsel
150 South Perry Street, Suite 150
Lawrenceville, GA 30046

Re: EPD Comments
Voluntary Investigation and Remediation Plan and Application, December 2012
Lou Sobh Ford Dealership, HSI Site No. 10915
1665 Scott Boulevard
Decatur, DeKalb County, Georgia 30033
Tax Parcel: 18-062-03-004

Dear Mr. Wood:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated December 2012 submitted by Sobh Decatur Properties, LLC pursuant to the Voluntary Remediation Program Act (the Act). EPD has the following comments:

1. The qualifying property tax parcel identified in the VIRP (18-062-03-004, 5.56 acres) appears to differ from the tax parcel originally associated with HSI No. 10915 (18-049-12-024, 9 acres). Please show the qualifying property tax parcel boundaries on a site map or aerial photograph.
2. The Type 1 and 3 Risk Reduction Standards listed in Tables 3.2.1 and 3.2.2 of the VIRP are approved for use at the site, with the following exceptions:
 - a. the soil Type 1 and 3 RRS for 4-methyl-2-pentanone is 200 mg/kg
 - b. the soil Type 1 and 3 RRS for tetrachloroethene is 0.5 mg/kg
 - c. the groundwater Type 1 and 3 RRS for chloroform is 0.08 mg/L (total trihalomethanes)
3. It appears that additional soil and groundwater sampling will be needed to show delineation of regulated substances. When demonstrating horizontal and vertical delineation for soil, it will be helpful to show all soil sample locations and results for polychlorinated biphenyls (PCBs) on a map, and all soil sample locations and results for tetrachloroethene on a map. Please also include a description of sample collection procedures when demonstrating soil delineation. When demonstrating groundwater delineation, please include well boring logs and construction diagrams along with a description of well development, purging, and sampling procedures.

4. Figure 8A should be revised so that cross-sections are drawn through or near monitoring well or soil boring locations. For example, separate cross-sections could be drawn to incorporate (MW-4, MW-6, and MW-1), (MW-1, MW-2, and MW-3), and (MW-5, MW-6, and MW-2), respectively. All cross-sections (such as Figure 8B) should include a horizontal scale. The aerial photograph superimposed on the cross-section (Figure 8B) can be omitted.
5. The VIRP discusses one Synthetic Precipitation Leaching Procedure (SPLP) sample that was analyzed for PCBs and two SPLP samples that were analyzed for tetrachloroethene. If SPLP tests are used to determine Type 2 or 4 RRS for soil, a minimum of six pairs of totals / SPLP results should be used to evaluate repeatability / trends in the data.

Sobh Decatur Properties, LLC must address these 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 future documents submitted by Sobh Decatur Properties, LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve Sobh Decatur Properties, LLC from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact David Hayes at 404-657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

cc: John P Martiniere, Peachtree Environmental

File: HSI 10915