



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

February 1, 2017

MSC Naples, LLC
Glenn Howell
c/o Mike Weinberger
General Manager, Lakeshore Mall
150 Pearl Nix Parkway
Gainesville, Georgia 30501

VIA FIRST-CLASS MAIL AND EMAIL

Re: EPD Comments on Voluntary Remediation Program Semiannual Report 1 – August 2016
Corners Shopping Center, HSI Site Number 10326
Marietta, Georgia; Cobb County

Dear Mr. Howell:

The Georgia Environmental Protection Division (EPD) has completed its review of the above-referenced document, submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). Our comments are provided below:

1. Based upon results of the focused soil-vapor assessment, combined with our evaluation of downgradient PCE concentrations in groundwater, EPD considers the vapor-intrusion pathway to be below applicable action levels.
2. EPD does not accept local ordinances prohibiting potable-well use as proof of an incomplete exposure pathway. If groundwater exceeds residential risk reduction standards on a VRP property or on an affected downgradient property, a covenant restricting groundwater use will be required to comply with Section 12-8-107(h) of the Act. EPD notes that the approved VRP application for this site proposed protection of human health via implementation of environmental covenants restricting groundwater use.
3. For purposes of this site, the hydraulically downgradient residences closest to the site shall be designated as the points-of-exposure (POEs). Accordingly:
 - a. Where direct observation of analytical data or groundwater contaminant fate-and-transport modeling indicates that groundwater impact on residential properties are within residential risk reduction standards (RRSs), MSC Naples, LLC may certify those properties as being within Type 1 or Type 2 RRSs for groundwater in the VRP CSR.
 - b. Where direct observation of analytical data or groundwater contaminant fate-and-transport modeling indicates that groundwater impact on residential properties exceed Type 1 or Type 2 RRSs, uniform environmental covenants (UECs) restricting groundwater use on those properties will be necessary.

4. Based upon our review of available groundwater data, EPD believes the site has been sufficiently delineated to Type 1 RRSs.
5. EPD has specific requirements for submittal of Biochlor groundwater-contaminant fate-and-transport model runs. If MSC Maples, LLC, chooses Biochlor for fate-and-transport modeling on the Corners Shopping Center site, please refer to Comment 8 in EPD's Supplemental Comments on Voluntary Investigation and Remediation Plan, dated February 26, 2016.

MSC Naples, 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 documents submitted by MSC Naples, LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve MSC Naples, LLC from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-3935.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

Attachments: EPD Approval of Entry into VRP, February 26, 2016
EPD Supplemental Comments on VIRP, February 26, 2106

c: Keith Cole, Ramboll Environmental (via email)