

Georgia Department of Natural Resources

Environmental Protection Division

2 Martin Luther King, Jr. Dr., Suite 1462 East, Atlanta, Georgia 30334

Judson H. Turner

Land Protection Branch

Keith M. Bentley, Branch Chief

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Reply To:

Response and Remediation Program
2 Martin Luther King, Jr. Drive, S.E.
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Atlanta, Georgia 30334-9000
Office 404-657-8600 Fax 404-657-0807

March 12, 2013

VIA EMAIL AND REGULAR MAIL

Former Southern Pipe Coating Operation, HSI # 10757
c/o Steven Hart
L.B. Foster Company
415 Holiday Drive
Pittsburg, PA 15220

Re: November 1, 2012 VRP CSR and proposed Environmental Covenant
Former Southern Pipe Coating Operation, HSI #10757
Tax Parcels: 6-252-029, -075
6420 Corley Road, Norcross, Gwinnett County, Georgia

Dear Mr. Hart:

The Georgia Environmental Protection Division (EPD) has completed its review of your Voluntary Remediation Program Compliance Status Report (VRP CSR) dated November 1, 2012, which includes the most recent Groundwater Sampling Event (Appendix 20) dated August 2012 and the proposed Environmental Covenant (Appendix 21). Based on EPD's review of these documents and information in its files, EPD concurs that the property, L.B. Foster Company, has been fully delineated and corrective action will be complete for Tax Parcels 6-252-029 and 6-252-075 in accordance with Type 1 Risk Reduction Standards as documented in the VRP CSR upon execution of an Environmental Covenant (EC). Therefore, the VRP CSR is hereby approved.

In order to remove site from the Hazardous Site Inventory, EPD requires that L.B. Foster Company implement an Environmental Covenant (EC) for tax parcel 6-252-029 that restricts groundwater usage on the site property. In regard to the proposed Environmental Covenant, please correct the following:

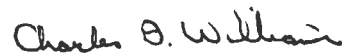
1. In the top right hand corner of the first page, a cross- reference needs to be included in the EC.
2. In the second paragraph of the second page, the word "excising" needs to be corrected to "exercising".
3. The section Permanent Markers may be deleted from the EC.

It should be noted that the Biochlor model used in the CSR was not calibrated appropriately to the site conditions based on the original release characteristics. However, EPD believes any adjustments to the model will not change the overall conclusions made within the report. Therefore, further monitoring of groundwater will not be required.

EPD's approval of this document extends only to those technical aspects of the document that expressly require EPD approval under applicable rules and statutes. This approval is not an endorsement by EPD that it accepts as conclusive any representations made in the document. Nor does EPD guarantee or warrant that the document is free of errors or omissions. EPD may later withdraw approval of this document, in whole or in part, if EPD determines that withdrawal is necessary to ensure compliance with the applicable rules and statutes.

Please provide the signed Environmental Covenant to EPD by April 30, 2013. Prior to sending the signed EC to EPD, it should be sent to interested parties and property abutters in accordance with the Uniform Environmental Covenant Act. If you have any questions regarding this matter, please contact Elise Chew of the Response and Remediation Program at (404) 657-0488.

Sincerely,



Derrick Williams
Program Manager
Response and Remediation Program

c: /Robert Finkelstein, T-2 Environmental

File: HSI #10757

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