



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

March 30, 2018

MSC Naples, LLC
Glenn Howell
c/o Mike Weinberger
5340 Johns View Street
Alpharetta, Georgia 30005

Re: August 2017 Voluntary Remediation Program Compliance Status Report
Corners Cleaners/Corners Shopping Center, HSI Site Number 10326
2745 Sandy Plains Road, Marietta, Georgia; Cobb County
Tax Parcel IDs 16055700120, 16055700200, and 16055700530

Dear Mr. Howell:

The Georgia Environmental Protection Division (EPD) has reviewed the August 2017 Voluntary Remediation Program (VRP) Compliance Status Report (CSR), submitted to EPD by MSC Naples, LLC pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100. Based upon EPD's review of this document and information in its files, EPD concurs that the property, Corners Cleaners/Corners Shopping Center, has been adequately delineated and corrective action will be complete for Tax Parcels 16055700120, 16055700200, and 16055700530, in accordance with Type 1 risk reduction standards (RRS) for soil and Type 5 RRS for groundwater, upon execution of an environmental covenant. Therefore, the VRP CSR is hereby approved, subject to the following conditions:

1. Please submit to EPD a revised Certification of Compliance, certifying the specific parcels above to Type 1 RRS for soil and Type 5 RRS for groundwater. Since the Type 4 groundwater RRS for tetrachloroethene (PCE) of 0.098 mg/L was exceeded at DVEW-7 during the February 2015 sampling event (0.250 mg/L), the site cannot be certified to a Type 4 groundwater RRS.
2. A construction/utility worker scenario cannot be used in place of non-residential scenario for determining compliance with Type 4 RRS. Accordingly, the non-residential Type 4 RRS applicable to the site is 0.098 mg/L. The construction/utility worker scenario is considered to be a category of risk-based numbers separate from a Type 4 RRS. The calculated groundwater PCE concentrations protective of construction workers and utility workers, as indicated on Tables 6 and 7, respectively, are incorrect. The groundwater RAGS, Part B, Equations 1 and 2, did not account for the inhalation pathway for a volatile substance. When calculating the groundwater risk-based concentration for volatile substances, both the oral and the inhalation pathways should be considered. Although not necessary, if you still would like EPD to approve groundwater RRS for a construction/utility worker scenario, please recalculate the groundwater PCE RRS concentrations and submit them to EPD for review.

3. EPD concurs with the recording of a Uniform Environmental Covenant (UEC) on the three parcels, as proposed in Section 7 of the VRP CSR. In addition to the proposed activity and use limitations, the UEC should include the following:

- a. A requirement for annual inspections of the following downgradient residential properties for the presence of potable wells:
 - i. 2766 Macby Avenue, Tax Parcel ID 16055700190
 - ii. 1820 Kerry Creek Drive, Tax Parcel ID 16052400450
 - iii. 1830 Kerry Creek Drive, Tax Parcel ID 16052400460
 - iv. 1840 Kerry Creek Drive, Tax Parcel ID 16052400470

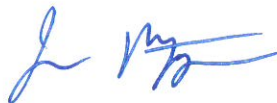
[Note: UECs are not being required on these parcels.]

- b. A requirement for submittal of an annual property evaluation to EPD, indicating whether the activity and use limitations are being met.

EPD's approval of this document extends only to those technical aspects of the document that expressly require EPD's 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 submit the draft UECs and revised Certification of Compliance by June 30, 2018. If you have any questions regarding this matter, please contact Allan Nix of the Response and Remediation Program at (404) 657-3935.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: Keith Cole, Ramboll Environ (via email)
File: HSI Site 10326: Corners Cleaners/Corners Shopping Center