

Georgia Department of Natural Resources
Environmental Protection Division

Reply To:
Response and Remediation Program
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Judson H. Turner, Director
Land Protection Branch
Phone: 404/656-7802 FAX: 404/651-9425

March 14, 2014

VIA EMAIL & REGULAR MAIL

Coats & Clark Inc.
c/o Mr. Mike Bell
374 Coats Drive
Toccoa, Georgia 30577-7986

Re: November 20, 2013 VRP Compliance Status Report
Coats & Clark Inc., HSI Site No. 10630
Tax Parcel ID R583800 T10 005

Dear Mr. Bell:

The Georgia Environmental Protection Division (EPD) has completed its review of your Voluntary Remediation Program Compliance Status Report (VRP CSR) dated November 20, 2013, which includes data from the most recent Groundwater and Surface Water Sampling Event, updated groundwater modeling conclusions, and a proposed Environmental Covenant. Based on EPD's review of this document and information within its files, EPD concurs that the above referenced Coats & Clark Inc. property has been fully delineated and corrective action will be complete for Tax Parcel R583800 T10 005 in accordance with site specific non-residential 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 Coats & Clark Inc. implement an EC for tax parcel R583800 T10 005 that designates future site property land uses as non-residential and restricts groundwater usage on the site. Other tax parcels overlying the delineated groundwater plume above the established residential risk reduction standards should also have ECs restricting groundwater usage. In regard to the proposed EC for the Coats & Clark Site property, please incorporate the following:

- Please ensure that the property remains non-residential and that any tenant or party to a lease is properly notified of and certifies compliance with the land use restrictions and site related institutional controls that are to be implemented in accordance with the said UEC.
- As part of the UEC Reporting and Annual Certification requirements, please include property use and UEC compliance certifications for all surrounding properties with site related enacted UECs. For the adjacent 133 Clark Street property that was associated with the vapor intrusion (VI) pathway analysis, please include an additional reporting/certification requirement to document that the conditions of the property and associated structure parameters have not been modified from those used during the original VI evaluation referenced in the VRP CSR.

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 EC(s) to EPD by May 15, 2014. 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. Should you have any question or concerns, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: James VanderWoude, Toccoa Renaissance, LLP

File: VIRP Application 965147780 – Coats & Clark Inc.

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