



Kasim Reed
MAYOR

CITY OF ATLANTA
DEPARTMENT OF WATERSHED MANAGEMENT
72 Marietta Street, N.W.
ATLANTA, GEORGIA 30303

Kishia L. Powell
COMMISSIONER

April 5, 2017

Mr. Bill Williams, Response and Remediation Program
Georgia Department of Natural Resources
Environmental Protection Division
2 Martin Luther King, Jr. Drive, SW, Suite 1054
Atlanta, Georgia 30334

Subject: Submittal of Semi-Annual Status Report # 4
310 Vine Street (aka Rodney Cook Senior Park) VRP Site

Dear Mr. Williams:

The City of Atlanta (City) received approval of its proposed Voluntary Investigation and Remediation Plan (VIRP) on June 15, 2015. This letter report, Semi-Annual Status Report # 4, is being submitted to you in compliance with the semi-annual progress reporting requirements specified in the approval letter. The following provides an update on work completed during the fourth semi-annual reporting period from December 2016 through April 5, 2017.

Please contact me at 404-546-1413 or Kristina Garcia of my staff at 404-546-1255 if you have any further comments or need additional information.

Sincerely,

Todd S. Hill, P.E., Interim Deputy Commissioner
City of Atlanta, Office of Watershed Protection

Attachment: Semi-Annual Status Report # 4

cc: Mr. Cory Rayburn, City of Atlanta Department of Watershed Management
Mrs. J. Kristina Teepen Garcia, P.G., City of Atlanta
Ms. Tricia H. Hatley, P.E., Freese and Nichols, Inc.
Ms. Susan U. Major, P.E., PRAD Group
Mr. Dustin J. Heizer, CHMM Amec Foster Wheeler
Mr. Charles T. Ferry, P.E. Amec Foster Wheeler



amec
foster
wheeler

April 5, 2017

Mr. Bill Williams, Response and Remediation Program
Georgia Department of Natural Resources
Environmental Protection Division
2 Martin Luther King, Jr. Drive, SW, Suite 1054
Atlanta, Georgia 30334

**Subject: 310 Vine Street (aka Rodney Cook Senior Park) VRP Site
Semi-Annual Status Report #4**

Dear Mr. Williams:

Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler), on behalf of the City of Atlanta's Department of Watershed Management (DWM), respectfully submits this Progress Report required under the Voluntary Investigation and Remediation Plan (VIRP) for the subject property that was approved by the Georgia Environmental Protection Division (EPD) in a letter dated June 15, 2015.

Since the last Progress Report submitted December 2016, the design team engaged by DWM has prepared plans and specifications for development of the 12.9-acre property as a public park in conjunction with the construction of a storm water management impoundment, similar to the impoundment installed at the Old Fourth Ward Park, to control and regulate storm water into the combined sewer (i.e. peak shaving). JP2, a joint venture lead by the PRAD Group, is coordinating the design team and has retained Amec Foster Wheeler as the environmental consultant on the project.

On February 28, 2017, COA DWM and Amec Foster Wheeler met with representatives of Georgia EPD to discuss the current design concept and the specifications include in this Progress Report.

BACKGROUND

As approved by Georgia EPD in its letter, the essential elements of corrective action per the VIRP consist of the following:

- Excavation of soils that are contaminated with lead greater than 400 mg/kg up to a depth of three feet below the surface;
- Stockpiling of the excavated soils in bins;
- On-Site stabilization treatment of the excavated soil stockpiles using EnviroBlend, Lime, Portland Cement, or an equivalent process;

- Treated soils will be confirmed to have less than 5 mg/L of lead in leachate by running the Toxicity Characteristic Leaching Procedure (TCLP) test;
- Treated soils will be disposed of at a permitted Class 2 non-hazardous waste landfill;
- Soil excavations will be backfilled to pre-excitation grade using clean fill material.

Prior to submittal of the VIRP approved by Georgia EPD, 353 soil samples had been tested for total lead content. Amec Foster Wheeler's further evaluation of the data in the context of the current design concept developed by JP2 has led to a refinement of the remediation approach.

DESIGN CONCEPT

The property located in historic Vine City will be developed as a public park. As an integral part of park development, soil excavation will be conducted to remove soil exhibiting lead impacts of 400 mg/kg or greater. On the east side of the property, the storm water management impoundment will be constructed following completion of the soil remediation activities. The west side of the property will be developed as a public park.

The final development grading plan for the proposed park, including the impoundment, will incorporate requirements of the soil corrective action. After excavation of the lead-impacted soil is complete, a geomembrane such as a high-density polyethylene (HDPE) liner, or similar material, will be installed beneath the pond footprint. As needed, materials such as gravel, soil or other earthen materials may be placed above the geomembrane liner to provide stability and to hold the liner in place. At this time, final design of the liner is not complete.

The attached figure (Figure 1) indicates the estimated extent of the planned soil remediation. This estimated extent is based on the results of the soil investigation effort and the current design concept.

REMEDIATION CONCEPT

We request that Georgia EPD consider the following specifications and additions to the VIRP.

- Excavate all soil with lead concentrations greater than 400 mg/kg (i.e. "lead-impacted soil");
- If the lead-impacted soil extends below the water table, the excavation is not required to extend below the water table;
- Confirmation of adequate soil removal will be demonstrated by testing soil samples for total lead obtained at 25-foot intervals along the side walls of each excavation and above the water table;

- Confirmation bottom soil samples will be collected and analyzed per 1,000 square feet of bottom for those areas of excavation that terminate above the water table;
- Pre-excavation soil results (2014 soil data) may be used as confirmation samples to delineate the extent of required excavation;
- Soils will be stockpiled on an impermeable surface with proper erosion controls (rather than in bins as indicated in the VIRP) in order to facilitate characterization sampling and potential stabilization activities in larger batches;
- Stockpiled soil will then be analyzed for leachable lead via TCLP analysis in maximum 500-ton increments before transportation to a permitted disposal facility;
- Stabilize on-site all lead-impacted soils that are determined to exceed the TCLP criterion of 5 mg/L for lead using EnviroBlend, Lime, Portland Cement or an equivalent process;
- If soils still exceed the TCLP criteria following stabilization, the soils will be stabilized a second time using EnviroBlend, Lime, Portland Cement or an equivalent process and will then be re-tested for the lead TCLP criterion;
- If, after resampling, soils pass the lead TCLP criterion, the soils will be disposed of at a RCRA Subtitle D landfill as non-hazardous waste;
- If stabilized soils still exceed the lead TCLP criterion after a second round of stabilization, the soils will be disposed of at a RCRA Subtitle C landfill as hazardous waste;
- Groundwater impacts at the subject property are limited in nature and extent; none of the constituents detected in groundwater were present at concentrations above their respective regulatory limits. However, in the areas of the detention pond at the approximate 920 to 922 elevation, a geomembrane liner or similar material has been incorporated into the site design and will be constructed in order to prevent human exposure to groundwater by creating a physical barrier between groundwater and surface water;
- A Uniform Environmental Covenant (UEC) will be filed with the county clerk to restrict the use of groundwater as drinking water and to ensure that no new groundwater exposure pathway is created at the subject property;
- If monitoring wells exist on-site, they will be plugged and abandoned to eliminate the groundwater pathway;
- A Sampling and Analysis Plan (SAP) will be developed to include excavation confirmation sampling and soil characterization sampling; and
- A Compliance Status Report (CSR) will be submitted upon completion of the soil corrective action under the VIRP.

Due to the suspected presence of lead-impacted soils, at a future date, COA plans to acquire property at 205, 209, 211 and 221 Elm Street with the intent of constructing a park expansion. Upon acquisition, corrective action will be completed for these parcels in accordance with the VIRP and consistent with the specifications described herein.


CLOSING

Amec Foster Wheeler respectfully requests that Georgia EPD comment on the design-specific modifications to the VIRP stated herein at its earliest convenience. If you have any questions regarding the information contained herein, please contact the undersigned.

Sincerely,

Amec Foster Wheeler Environment & Infrastructure, Inc.


Dustin J. Heizer
Senior Project Manager

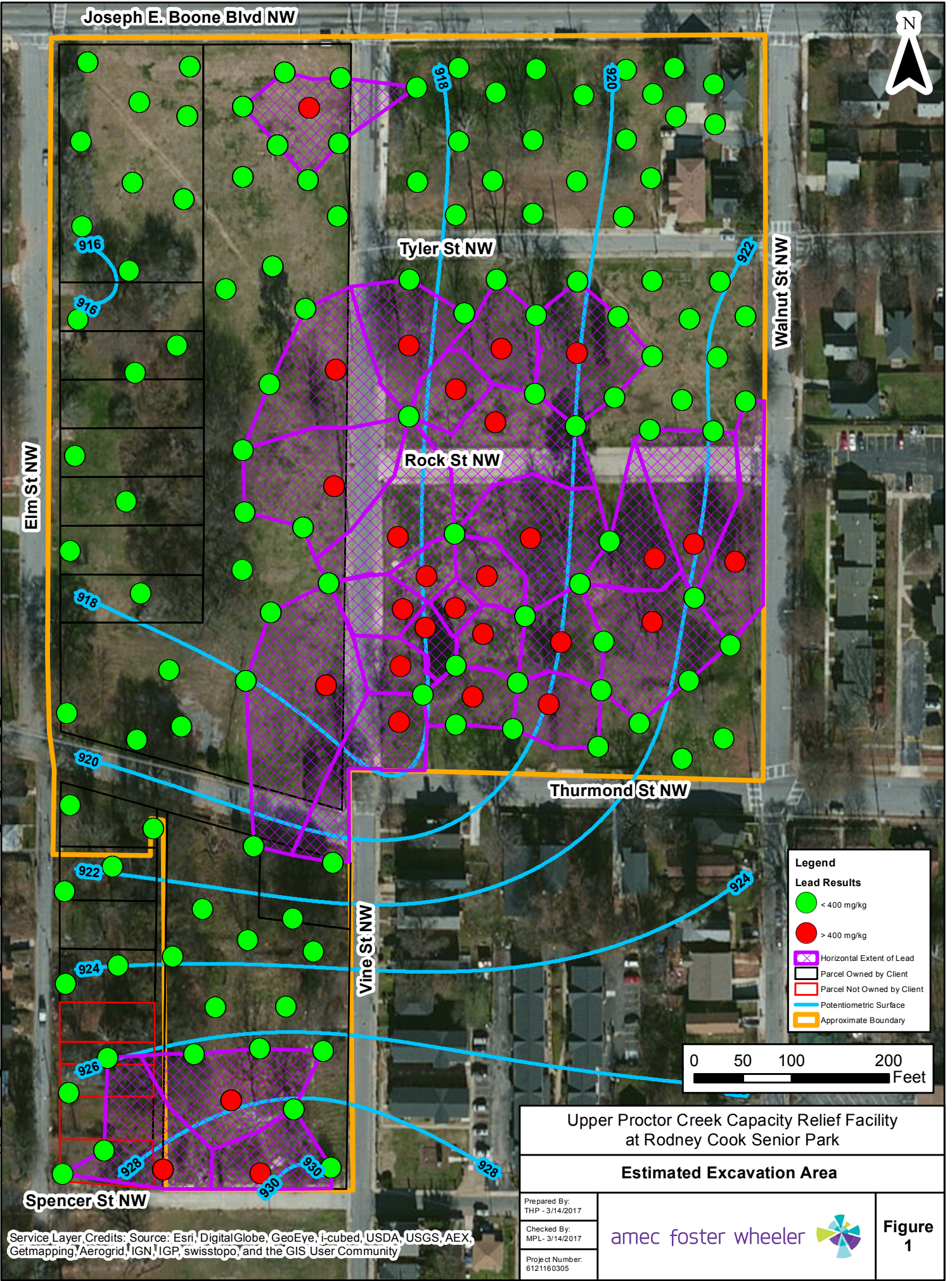

Charles T. Ferry, P.E.
Senior Principal Engineer

Attachment: Figure 1 - Estimated Excavation Area

cc: Mr. Todd Hill, P.E., City of Atlanta Office of Watershed Protection
Mr. Cory Rayburn, City of Atlanta Department of Watershed Management
Mrs. J. Kristina Teeppen Garcia, P.G., City of Atlanta
Ms. Tricia H. Hatley, P.E., Freese and Nichols, Inc.
Ms. Susan U. Major, P.E., PRAD Group

FIGURE

Document Path: G:\upper_proctor_creek\mxd\lead_estimated_excavation_area_updates_3_13_17.mxd



Joseph E. Boone Blvd NW



916

918

920

Tyler St NW

Walnut St NW

Elm St NW

916

918

Rock St NW

920

Thurmond St NW

922

Vine St NW

924

924

926

928

930

930

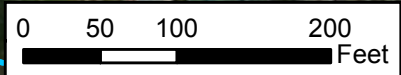
928

Spencer St NW

Legend

Lead Results

- < 400 mg/kg
- > 400 mg/kg
- Horizontal Extent of Lead
- Parcel Owned by Client
- Parcel Not Owned by Client
- Potentiometric Surface
- Approximate Boundary



Upper Proctor Creek Capacity Relief Facility
at Rodney Cook Senior Park

Estimated Excavation Area

Prepared By:
THP - 3/14/2017

Checked By:
MPL - 3/14/2017

Project Number:
6121160305

amec foster wheeler



Figure
1

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community