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December 13, 2016

Mr. Tom Brodell
Georgia Environmental Protection Division Land Protection Branch
2 Martin Luther King, Jr. Drive SE
Suite 1456 East
Atlanta, Georgia 30334

Subject: January 2017 Semi-Annual Voluntary Remediation Program Progress Report
North Berkeley Lake Road Site (HSI No. 10844)
Duluth, Gwinnett County, Georgia

Dear Mr. Brodell:

This Progress Report documents the activities completed for the North Berkeley Lake Road Site, also referred to as Fire Station 19, in Duluth, Georgia from July 2016 through December 2016. This report constitutes the fourth semi-annual progress report and follows the schedule outlined in the Georgia Environmental Protection Division's (EPD's) letter dated January 15, 2015.

This Progress Report includes the following:

- Work Performed This Period;
- Work Anticipated for the Next Period;
- Schedule; and
- Professional Certification.

Work Performed This Period

Limited work was performed during the current reporting period as Gwinnett County and its consultant, CDM Smith, continue to wait on potential U.S. Environmental Protection Agency (EPA) approval of a new model for evaluating the bioavailability of arsenic. If approved for use, the results of this method would have a significant impact on the final Risk Reduction Standards (RRSs) for Fire Station 19. Lower RRSs are likely to mitigate potential costs and secondary impacts associated with addressing arsenic in soil while being sufficiently protective. For example, one method currently under consideration for Fire Station 19 is to pave the open areas of the site, thus preventing access to arsenic in soil for the trespasser and onsite worker scenarios. This method, while less expensive than excavation and offsite disposal, is still costly and has negative stormwater and aesthetic impacts.

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CDM Smith recently inquired about the status of EPA approval of the new bioavailability model. Matthew Lambert, an Environmental Scientist at EPA, provided the following e-mail response on December 12, 2016:

We received your inquiry regarding the validation of As IVBA SW-846 Method 1340/EPA 9200.2-86. We anticipate completing the validation by the end of March 2017. The subcommittee working on this project is scheduled to meet to finalize the NIST standard value from the round robin in early January. Once that's done, the method validation needs to go through the TRW approval process which includes review by the full committee and by OSRTI management.

Gwinnett County and CDM Smith will continue to monitor progress of EPA validation. As noted in correspondence from your office dated December 9, 2016, the deadline for submittal of a final remediation plan was extended to January 2018. Considering EPA's response, we do not anticipate any concerns meeting the revised deadline or the original compliance status report deadline of July 15, 2020.

Work Anticipated for the Next Period

Gwinnett County and CDM Smith will continue monitoring EPA progress and approvals regarding the use of bioavailability methods for setting arsenic cleanup levels. If EPA validation occurs as noted above, Gwinnett County and CDM Smith will proceed with preparation of a final remediation plan.

Schedule

As previously noted, the deadline for submittal of a final remediation plan for Fire Station 19 is January 15, 2018. Gwinnett County and CDM Smith expect to submit a final remediation plan within approximately six weeks of EPA validation of the new bioavailability model for arsenic, assuming validation occurs as stated by EPA.

Professional Certification

Attachment A contains the professional certification and summary of incurred professional engineer and geologist hours for the period from July 1, 2016 through December 10, 2016.

If you have any questions regarding this Progress Report, please do not hesitate to contact me at (678) 376-6953 or richard.shoeck@gwinnettcountry.com.

Sincerely,

GWINNETT COUNTY DEPARTMENT OF WATER RESOURCES



Richard Schoeck, P.E., PMP
Division Director of Project Controls

Attachment

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Georgia Department of Natural Resources, EPD; Mr. Tom Brodell
North Berkeley Lake Road Site (HSI No. 10844) – January 2017 Semi - Annual
December 13, 2016

cc: Tom Duffey, CDM Smith
Forrest Fields, Gwinnett County
J.C. Lan, Gwinnett County
John Reichling, CDM Smith
Andrew Romanek, CDM Smith

Professional Certification

I certify under penalty of law that this report and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, et seq.). I am a professional engineer / professional geologist who is registered with the Georgia State Board of Registration for Professional Engineers and Land Surveyors / Georgia State Board of Registration for Professional Geologists and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances.

Furthermore, to document my direct oversight of the Voluntary Remediation Plan development, implementation of corrective action, and long term monitoring, I have attached a monthly summary of hours invoiced and description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division.

The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Andrew Romanek

Andrew P. Romanek, P.E.
Associate
CDM Smith



12/13/16

Date

Summary of Oversight Provided by Georgia Licensed Engineers and Geologists

Engineer / Geologist	License Type and No.	Week Ending Date	Number of Hours	Description of Hours
Tom Duffey	Geologist PG000899	7/16/16	1	Senior hydrogeologist and technical lead. Involved in discussions and evaluations regarding remedial action.
John Reichling	Engineer PE017367	7/9/16	2	CDM Smith Officer in Charge and person overall responsible for project execution and quality.
Andrew Romanek	Engineer PE029287	7/16/16	2	Project manager and CDM Smith primary point of contact. Involved in all aspects of the project, including evaluation of remedial action options.
		8/27/16	0.5	
		12/3/16	0.5	

Schoeck, Richard

From: Woodbury, Lynn <woodburyl@cdmsmith.com>
Sent: Monday, December 12, 2016 5:47 PM
To: Romanek, Andrew
Cc: Duffey, James
Subject: FW: TRW Response: As IVBA method validation inquiry

Andrew –
See below for an update on the arsenic IVBA method validation status and schedule.
Please let me know if you need any additional information,
Lynn

+++++

Lynn Woodbury | CDM Smith | 555 17th Street, Suite 500 | Denver, CO 80202 | direct: 303.383.2382 | fax: 303.308.3003 | woodburyL@cdmsmith.com

NOTE the new suite number

Weekly Mindbender: Two of Santa's reindeers are named after weather phenomenon. Which two? [Answer: Donner, which means thunder in German, and Blitzen, which means lightning]

From: Lambert, Matthew [<mailto:Lambert.Matthew@epa.gov>]
Sent: Monday, December 12, 2016 3:02 PM
To: Woodbury, Lynn <woodburyl@cdmsmith.com>
Cc: Griffin, Susan <Griffin.Susan@epa.gov>; Partridge, Charles <Partridge.Charles@epa.gov>; Bradham, Karen <Bradham.Karen@epa.gov>; diamond@srcinc.com
Subject: TRW Response: As IVBA method validation inquiry

Hello Lynn,

We received your inquiry regarding the validation of As IVBA SW-846 Method 1340/EPA 9200.2-86. We anticipate completing the validation by the end of March 2017. The subcommittee working on this project is scheduled to meet to finalize the NIST standard value from the round robin in early January. Once that's done, the method validation needs to go through the TRW approval process which includes review by the full committee and by OSRTI management.

Thank you,
Matt, on behalf of the Bioavailability TRW cochairs



Matthew K. Lambert, M.Sc.
Environmental Scientist

Office of Land and Emergency Management,
Office of Superfund Remediation and Technology Innovation,
Assessment and Remediation Division,

Science Policy Branch

<http://www.epa.gov/superfund/health/conmedia/sediment/index.htm>

Phone: (703) 603-7174; Fax: (703) 603-9102

If you would like to send me a file larger than 25 MB, please contact me to make arrangements.