



June 28, 2017

Mr. Kevin Collins  
Response & Remediation Program  
Georgia Environmental Protection Division  
2 Martin Luther King Jr. Drive, SE,  
Suite 1054  
Atlanta, Georgia 30334

RE: Voluntary Remediation Program (VRP) Semi-Annual Progress Report #10  
Tara Shopping Center  
8564 Tara Boulevard, Jonesboro, Clayton County, Georgia  
Tax Parcel ID 13242D B001; HSI Site No. 10798

Dear Mr. Collins,

On behalf of Ashland LLC (Ashland), EHS Support LLC (EHS Support) is submitting this Semi-Annual Progress Report for the project referenced above. Pursuant to the VRP application conditional approved letter issued on June 28, 2012, the purpose of this progress report is to provide a summary of activities completed between January 2017 and June 2017. A summary of activities is provided below.

#### **Groundwater Corrective Action**

The last Semi-Annual Progress Report was submitted to the Georgia Environmental Protection Division (EPD) on January 31, 2017 and approved on February 28, 2017.

Requests for Streamlined Uniform Environmental Covenants were submitted to the seven properties identified in the revised Groundwater Corrective Action Plan (CAP). Ashland will continue to pursue groundwater use restrictions at these properties.

The first annual groundwater sampling event outlined in the Groundwater CAP is scheduled to commence the week of June 26, 2017. The results of sampling will be provided in the next semi-annual status report due on or before December 28, 2017.

#### **Vapor Intrusion Evaluation**

Field activities for vapor intrusion evaluation are anticipated to begin this Summer. Ashland is currently negotiating access to perform this work. The results of sampling will be provided in the next semi-annual status report due on or before December 28, 2017.

#### **VRP Status**

Ashland will monitor groundwater under the schedule outlined in the approved Groundwater CAP. However, per Georgia EPD letter dated February 28, 2017, Ashland will continue to submit semi-annual progress reports through the compliance monitoring period.

Ashland proposes to submit an addendum to the VRP application (in lieu of a consent order). The purpose of this addendum is to provide an updated list of qualifying properties and a revised milestone schedule for compliance monitoring and vapor intrusion investigation beyond the initial 5-year VRP timeframe. Ashland believes this approach is reasonable and aligns with Section 5 of the VRP application which states: *“The director may extend the time for or waive these or other milestones in the participant’s plan where the director determines, based on a showing by the participant, that a longer time period is reasonably*

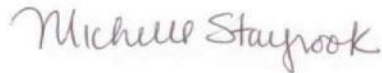
*necessary*". This approach reflects the commitment by Ashland to continue good work, protect human health and the environment and maintain a positive relationship with EPD and property owners.

**Professional Engineer/Geologist Time**

Professional engineer and geologist time during this reporting period were nominal; therefore, a tabulated summary is not provided.

If you should have any questions regarding the information presented in this progress report, please contact me at [michelle.stayrook@ehs-support.com](mailto:michelle.stayrook@ehs-support.com) or 412-807-1494.

Sincerely,



Michelle Stayrook  
EHS Support  
Project Manager

**Attachments**

cc: John Hoffman, Ashland (email)  
Rich Williams, Esq., Ashland (email)  
Eric Nathan, Tara Retail Holdings, Inc.  
Amy Magee, King and Spalding  
Jonathan Waddell, P.E. EHS Support (email)

