

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 or 412-807-1494.

Sincerely,
Michelle Stayrook

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)



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."

Jonathan Patrick Waddell PE037262

Printed Name and GA PE/PG

Number

Date

see below

Signature and Stamp

