

DEC 9 2016



PEACHTREE
ENVIRONMENTAL

Response and Remediation Program

3000 NORTHWOODS PARKWAY, SUITE 105
NORCROSS, GEORGIA 30071
770-449-6100 / FAX 770-449-6119

November 28, 2016

Mr. Alan Nix
Georgia Dept. of Natural Resources
Environmental Protections Division
Land Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334

Re: Silverstein's Cleaners, HSI Site Number 10875

Dear Mr. Nix:

We have received a copy of the EPD letter dated November 10, 2016 concerning the above-referenced Site. This letter will attempt to explain to you the situation as it currently exists. We appreciate EPD's understanding and cooperation in addressing this situation and acknowledge the need for continued action.

The law firm of Hawkins Parnell Thackston & Young ^{LLP} ("Hawkins Parnell") was hired as defense counsel for Edspen, LLC for the Silverstein Cleaners Property located at 3818 Washington Road, in Martinez, Columbia County Georgia ("the Site") by Edspen's insurer. Hawkins Parnell is not insurance coverage counsel for Edspen; nonetheless, Hawkins Parnell deemed it in the best interests of Edspen to gather all resources and conducted an exhaustive investigation to locate documentation to show that Edspen acquired a claimed interest in other substantial insurance policies after various corporate mergers and/or acquisitions to satisfy an inquiry from a separate insurance company conducting an insurance coverage analysis. This investigation involved researching historical government and legal records, and conducting interviews to ascertain the information needed to secure funding to apply to the Site.

To date, Hawkins Parnell has been unable to identify additional resources other than one insurance policy to apply to the investigation and remediation of the Site. Hawkins Parnell is in the process of obtaining approval from the insurance company to apply the limited funds available through the existing policy to a revised remediation proposal that will effectuate the most comprehensive clean-up within the resources available. This has resulted in some delays in choosing the most appropriate remediation alternatives.

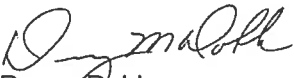
We understand that the lack of insurance coverage is not a reason to do less than may be required, but in this case it is a major consideration. Also, as you are aware the elder, Mr. Bernie Silverstein, whose health is failing, was in the process of turning the business over to his

son Mr. Louis Silverstein. Unfortunately, Louis Silverstein was diagnosed with Huntington's Disease approximately two years ago, and his condition has deteriorated dramatically in the past 12 months. The family and business situation is tenuous at best.

Again, we are in the process of finalizing a revised investigation and remediation proposal with Edspen's insurer and legal counsel. We will keep you apprised of our continued progress in addressing the Site and appreciate your guidance in this regard.

We also understand that a complete VRP Report will be required by March 6, 2017. We look forward to working with you to bring this matter to final resolution.

Sincerely,
PEACHTREE ENVIRONMENTAL


Denny Dobbs
Senior Project Manager


John Martiniere
Project Director