

September 5, 2014

VIA ELECTRONIC AND REGULAR MAIL

COPY

Ashland, Inc.
c/o Mr. Mike Dever
5200 Blazer Parkway, Suite DA-5
Dublin, Ohio 43017

Re: Voluntary Remediation Program Semi-Annual Progress Report # 4 – June 27, 2014
Soil Remediation Completion Report – March 14, 2014
Tara Shopping Center, HSI Site No. 10798
8564 Tara Boulevard, Jonesboro, Georgia (Clayton County)
Tax Parcel ID 13242D B001

Dear Mr. Dever:

The Georgia Environmental Protection Division (EPD) has reviewed the above referenced documents which were submitted for the Tara Shopping Center site in accordance with the Voluntary Remediation Program Act (the Act). EPD recognizes the extensive effort and expense that was undertaken to address source area soil impacts and is in agreement with the verification results from the soil remediation activities completed on-site. EPD offers the following comments which should be addressed pursuant to the Act.

Voluntary Remediation Program Semi-Annual Progress Report # 4 – June 27, 2014

1. The potentiometric contours drawn on Figure 5 do not account for the groundwater elevation at MW-8C and should be revised to reflect that elevation unless there is some justification for excluding it from the data set. No field logs have been provided from the May 2013 sampling event to show how groundwater samples and groundwater field data was collected. This data is needed to confirm the wells are being sampled according to EPA guidance documents. In all future reports, please provide field sampling logs for each well where a sample is collected.

Soil Remediation Completion Report – March 14, 2014

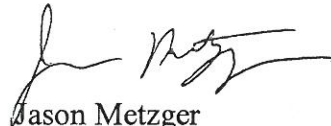
2. Based on the soil remediation work completed to date, EPD acknowledges that active soil remediation at the Site is now complete. EPD also concurs that soil delineation has been satisfied in accordance with the Act and that soil impacts not addressed through ISS should be included in the proposed Uniform Environmental Covenant (UEC). However, should new sources of site-related contamination be discovered in the future, additional delineation and remediation may be required.

3. EPD concurs with the proposed supplemental groundwater monitoring program outlined in Section 5.0 for groundwater immediately down gradient of the Treatment Area.
4. The SPLP data presented in Appendix A is incorrectly reported in micrograms per liter (ug/L). The correct units are milligrams per liter (mg/L).
5. There are several edits that should be made to draft UEC prior to finalizing it which have been provided via email. Other recent UECs, approved by EPD, can be found on the EPD website at <http://epd.georgia.gov/uniform-environmental-covenants>.

Ashland must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, and standards of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Ashland. However, failure of EPD to respond to a submittal within any timeframe does not relieve Ashland from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Ashland fail to comply with the approved schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program.

EPD anticipates receipt of the next Semi-Annual Progress Report no later than December 28, 2014. If you have any questions regarding this matter, please contact Robin Futch, PG, PMP at 404-657-8686.

Sincerely,



Jason Metzger
Unit Coordinator
Response and Remediation Program

c: Eric Nathan, Tara Retail Holdings, Inc. (via email)
Michelle Stayrook, EHS Support (via email)

File: HSI Site 10798