

# **Georgia Department of Natural Resources**

## **Environmental Protection Division-Land Protection Branch**

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

February 20, 2015

### VIA ELECTRONIC AND REGULAR MAIL

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

Re: Voluntary Remediation Program Semi-Annual Progress Report # 5 – December 24, 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 document which was submitted for the Tara Shopping Center site in accordance with the Voluntary Remediation Program Act (the Act). EPD offers the following comments which should be addressed pursuant to the Act.

1. EPD acknowledges and approves Ashland's request for a six-month extension to complete the remaining groundwater investigation work associated with off-site delineation and preparation of a groundwater remediation plan.
2. The draft Monitoring and Maintenance Plan included with the report includes appropriate requirements for the site and is hereby approved. Please include a final version with the next progress report. There are minor edits that could be made to the draft environmental covenant prior to finalizing that document. These have been provided in a WORD file via email.
3. For the groundwater samples that were collected as low flow samples, the location of the pumps relative to the screened interval during purging was high relative to the mid-point interval of the screen in 11 of the wells per the field sampling logs. For the low-flow purging method, the pump intake should be placed near the mid-point of the screened interval (see Groundwater Sampling, USEPA SESDPROC-301-R3, Section 3.2.2).
4. The groundwater sample collected from MW-11A was retrieved using a bailer. The groundwater-sampling methodology required by EPD is specified in the EPA Region 4 Field Branches Quality System and Technical Procedures, Science and Ecosystem Support Division (SESD OPs), "Procedure SESDPROC-301-R3, Groundwater Sampling," effective date March 6, 2013. The use of bailers for purging and sampling monitoring wells is specifically discouraged in Section 3.3.1.2 of this document. During future groundwater sampling events at the site, please use low-flow purging methods on all wells.
5. The turbidity readings for 12 of the 22 wells for which groundwater data was reported exceeded 10 NTUs when the groundwater samples were collected. For the eight newly installed well, no turbidity readings were recorded. Purging criteria require turbidity readings to be recorded and stability criteria require that turbidity be less than 10 NTUs.

Please continue purging until stability is achieved before taking the sample, in accordance with SESDPROC-301-R3.

6. Trend graphs should be developed showing tetrachloroethene, trichloroethene, cis-1,2-dichloroethene, and vinyl chloride concentrations for the performance monitoring wells, MW-3A/3B, MW-8A/8B/8C, MW-9A/9B/9C, MW-10A/10B/10C, and MW-11A/11B/11C. These trend graphs should include all historical data, the applicable risk reduction standards, and should demark when the soil in-situ solidification/stabilization remedial action was completed.
7. In future updates to site cross sections, as part of an updated Conceptual Site Model, please include the most recent groundwater sampling data for the wells shown.

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, which should include the final remedial plan and an updated Conceptual Site Model, no later than June 28, 2015. If you have any questions regarding this matter, please contact Robin Futch, PG, 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

S:\RDRIVE\RFUTCH\HSI SITES\10798 - Tara Shopping Center\TARA\_SA Progress Rpt #5\_EPD Comments.doc