



June 28, 2016

Ms. Robin Futch  
Georgia Department of Natural Resources  
Response and Remediation Program  
2 Martin Luther King, Jr. Drive  
S.E. Suite 1462, East Tower  
Atlanta, Georgia 30334-9000

RE: Voluntary Remediation Program Semi-Annual Progress Report #8  
Tara Shopping Center  
8564 Tara Boulevard, Jonesboro, Clayton County, Georgia  
Tax Parcel ID 13242D B001; HSI Site No. 10798

Dear Ms. Futch,

On behalf of Ashland Inc. (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 2016 and June 2016.

#### **Groundwater Corrective Action Plan**

On March 17, 2016, Ashland submitted to the Georgia Department of Natural Resources Environmental Protection Division (EPD) a Groundwater Corrective Action Plan (CAP) proposing corrective action activities for groundwater impacts associated with the former dry cleaner site. In brief, the Groundwater CAP proposed the following:

- Streamlined Uniform Environmental Covenants at off-site properties;
- Groundwater Monitoring Program;
- Surface Water Monitoring Program; and,
- Well Inspection and Well Abandonment Program

Monitoring well MW-15C should be included in the proposed groundwater sampling program. This well was inadvertently omitted from Section 8.2.2 (*Groundwater Sampling*) of the Groundwater CAP.

Confirmation of public notification of the Groundwater CAP was submitted to the EPD on April 18, 2016.

#### **Site Activities**

Groundwater sampling activities, which were completed in January 2016 in support of post soil remediation monitoring, were summarized in the March 17, 2016 Groundwater CAP. No other field activities have been completed during this reporting period.

#### **Financial Assurance**

The annual financial assurance documentation was initially submitted to the EPD on May 12, 2016. The financial assurance document is currently being revised to reflect the cost estimate provided in the March 17, 2016 Groundwater CAP (*Table 6*) in the amount of \$403,690. A copy of the revised financial assurance document will be provided under separate cover.

### **Professional Hours and Certification**

A summary of professional hours from March 1, 2016 through May 31, 2016 is provided in **Attachment A**. A summary of hours through February 29, 2016 was provided in the March 17, 2016 Groundwater CAP.

Certification of the information presented in this progress report is provided as **Attachment B**.

### **June 28, 2016 Conference Call**

On June 28, 2016 representatives of Ashland and EPD discussed the status of the Groundwater CAP review. The document is currently under EPD review and written comments are anticipated within the next 30 days.

A focused Vapor Intrusion (VI) sampling and analysis plan was developed to evaluate the potential for complete exposure pathways. The EPD requested VI assessment activities be completed in accordance with the United States Environmental Protection Agency's *Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air*, dated June 2015. A copy of the VI sampling and analysis plan will be provided for EPD's feedback prior to field implementation.

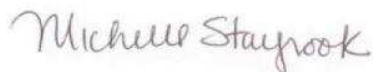
### **Schedule**

It is anticipated corrective action activities will resume within 30-days of the EPD's approval of the Groundwater CAP. A revised Groundwater CAP schedule will be forwarded to EPD once contractors are procured.

The next Semi-Annual Progress Report will be submitted on or before December 28, 2016.

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. Alternatively you can contact Michael Dever at [mbdever@ashland.com](mailto:mbdever@ashland.com) or 614-790-1586.

Sincerely,



Michelle Stayrook  
EHS Support  
Project Manager

### **Attachments**

cc: Michael Dever, 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)

**ATTACHMENT A**  
Professional Services



**Attachment A**

**Tabulated Summary of Professional Engineer and Geologist Time (Period March 1, 2016 through May 31, 2016)**

**Tara Shopping Center, 8564 Tara Boulevard, Jonesboro, GA**

**Voluntary Remediation Program (HSI 10798)**

<b>Professional Service</b>	<b>Date</b>	<b>Hours</b>	<b>Description</b>
<b>Professional Engineer</b>			
Jonathan Waddell, PE	3/1/2016	0.5	Correspondences to MS
	3/8/2016	1.5	Edits to Alterman CAP schedule (0.75 hrs.), call with MS (0.5 hrs.), edits to CAP (0.25 hrs.)
	3/9/2016	1	Call with Alterman Team (0.75 hrs.), review of VI memo (0.25 hrs.)
	3/10/2016	1	Review of edits to CAP, email to team (0.5 hrs.), email to Antea Group requesting cost (0.5 hrs.)
	3/11/2016	2	Review of Amy's edits to RA (0.25 hrs.), calls with MS regarding MNA memo edits (0.5 hrs.), revisions to memo (0.75 hrs.)
	3/16/2016	1	Review and comment to Alterman CAP
	3/22/2016	2	Call with MS regarding CAP (0.5 hrs.), submittal of MNA Scoring results to MS (0.25 hrs.), preparation of DRAFT response to GA EPD email (0.5 hrs.), Call with GA EPD (0.75 hrs.)
	4/8/2016	1.5	Call with MS regarding action items (0.75 hrs.), review of Type IV and V RRS strategy (0.75 hrs.)
	4/12/2016	1	Call with Ashland
	5/6/2016	0.5	Call with MS re: Vapor Intrusion Work Plan
<b>Professional Geologist</b>			
Pat Peterson, PG	3/1/2016	1	Address Ashland's comments to groundwater CAP
	3/4/2016	1	Strategy discussion with PM
	March 2016	22.5	Vapor Intrusion Work plan development

**ATTACHMENT B**  
Certification Page



**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.”

\_\_\_\_\_  
Printed Name and GA PE/PG Number

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature and Stamp

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