## engineering and constructing a better tomorrow

August 2, 2010

Ms. Alex Cleary Program Manager Hazardous Waste Management Branch Suite 1462, East Tower 2 Martin Luther King Jr. Drive SE Atlanta, Georgia 30334

Subject:

Revised Voluntary Remediation Plan Application

B&L Discount Auto Repair 3796 Flat Shoals Parkway

Decatur, Georgia HSI Site No. 10890

Dear Ms. Cleary:

On behalf of Sandy Head, Inc. ("Sandy Head"), owner of the above-referenced property, MACTEC Engineering and Consulting, Inc. respectfully submits this Revised Voluntary Remediation Plan including a completed Application Form and Checklist. This submittal follows EPD's June 1, 2010 comment letter, which found the May 13, 2010 application to be incomplete. Subsequently, Mr. Scott Laseter, as Sandy Head's legal counsel, contacted Mr. Mark Smith of EPD to clarify requirements for Sandy Head to submit a complete Voluntary Remediation Plan application. Accordingly, this submittal addresses those issues described in a June 9, 2010 letter submitted to Mr. Smith from Mr. Laseter.

Please contact the undersigned if any questions arise.

Sincerely,

cc:

MACTEC Engineering and Consulting, Inc.

Tyler Boyles Project Geologist

Mr. Eric Wallens, Sandy Head, Inc.

Mrs. Scott Laseter, Kazmarek Geiger & Laseter, LLP

Attachments: Appendix A Warranty Deed and Tax Plat Map

Appendix B Figures

Appendix C Conceptual Site Model
Appendix D GANTT Schedule

Appendix E PE Supporting Documentation

Appendix F EPD HS1 Listing Memorandum dated March 3, 2008

Senior Principal Engineer

### Voluntary Remediation Plan

A revised Voluntary Remediation Plan Application Form and Checklist follows.

Voluntary Remediation Plan Application Form and Checklist

|  | voluntary Rei  |   | PPLICANT INFO  |   | · · · · · · · · · · · · · · · · · · ·  | 21100Kilot  |
|--|--|---|--|---|--|---|
| COMPANY NAME   | Sandy Head, Inc  |   |  |   | ····   |   |
| CONTACT PERSON/TITLE   | Eric W. Wallens / Administrator  |   |  |   |  |   |
| ADDRESS  | DRESS Post Office Box 8895, Atlanta, Georgia 31106-0895  |   |  |   |  |   |
| PHONE  | 404-888-0820 FAX 404-888-0045 E-MAIL ewallens@bellsouth.net  |   |  |   |  |   |
| GEORGIA CER  | TIFIED PROFESSION  | NAL GEOL  | OGIST OR PRO   | ESSIONAL  | ENGINEE  | R OVERSEEING CLEANUP  |
| NAME   | Charles T. Ferry   |   |  | GA PE/PG N  | NUMBER   | 10957 (PE)  |
| COMPANY  | MACTEC Engineering and Consulting, Inc.  |   |  |   |  |   |
| ADDRESS  | 396 Plasters Avenue, NE  | , Atlanta, Geo  | orgia 30324  |   | 4.   |   |
| PHONE  | 404-817-0107   | FAX   | 404-817-0175   | E-MAIL  | ctferry@ma   | ictec.com   |
|  |  | APPL  | CANT'S CERTIF  | ICATION   |  |   |
| Section 9601.  (B) Currently undergoing (C) A facility required to I (3) Qualifying the property und delegation or similar authorizat (4) Any lien filed under subsect the director pursuant to Code S In order to be considered a par (1) The participant must b (2) The participant must b (2) The participant must b qualified personnel properly garesponsible for gathering the insignificant penalties for submit I also certify that this property in Code Section 12-8-106.  APPLICANT'S | response activities require have a permit under Code er this part would not violation from the United States ion (e) of Code Section 12-8-94 or Code Section 12-8-94 or Code Section 10-8-94 or Code S | ed by an orde<br>Section 12-8-<br>te the terms a<br>Environment<br>8-96 or subse<br>ection 12-13-<br>voluntary render, judgment<br>achments we<br>nation submit<br>submitted is<br>iding the poss | r of the regional adm<br>66.<br>and conditions under<br>al Protection Agency<br>ection (b) of Code Se<br>3.<br>nediation property or<br>t, statute, rule, or reg<br>re prepared under m<br>ted. Based on my ind<br>to the best of my knowled | inistrator of the which the divis ction 12-13-12 a chave express pulation subject y direction or signify of the perspowledge and barisonment for kerisonment for kerisonment for kerisonment. | e federal Environmental Enviro | compensation, and Liability Act, 42 U.S.C. commental Protection Agency; or and administers remedial programs by operty shall be satisfied or settled and released by onter another's property to perform corrective action. ement authority of the director. accordance with a system designed to assure that who manage the system, or those persons directly courate, and complete. I am aware that there are ions.  105 and I am eligible as a participant as defined in |
| SIGNATURE  APPLICANT'S NAME/TITLE (PRINT)  | كتند ك. ل  | PALLEN  | 15, Domin  | STATE   | DAT  | E AUG 5, 2010   |

|                   | QUALIFYING   | PROPERTY INFORMATION   |  |  |
|-------------------|--|--|--|--|
| TAX PARCEL ID     | 15-089-02-005  | PROPERTY SIZE (ACRES)  | 0.47   |  |
| PROPERTY ADDRESS  | 3796 Flat Shoals Parkway   |  | .1   |  |
| CITY              | Decatur  | COUNTY   | Dekalb   |  |
| LATITUDE          | 33.69728 N   | LONGITUDE  | -84.2645 W   |  |
| PROPERTY OWNER(S) | Sandy Head, Inc.   | PHONE #  |  |  |
| MAILING ADDRESS   | P.O. Box 8895  |  | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,                             |  |
| CITY              | Atlanta  | STATE/ZIP  | GA / 31106-0895  |  |
| ITEM#             | DESCRIPTION O  | F REQUIREMENT  | Location in VRP<br>(i.e. pg., Table #,<br>Figure #, etc.)          | For EPD<br>Comment Only<br>(Leave Blank) |
| 1.                | \$5,000 APPLICATION FEE IN THE FORM GEORGIA DEPARTMENT OF NATURAL  |  | Check #5420<br>Paid 9/18/2009                                      |  |
| 2.                | WARRANTY DEED(S) FOR QUALIFYING  | PROPERTY.  | Appendix A   |  |
| 3.                | TAX PLAT OR OTHER FIGURE INCLUDI<br>BOUNDARIES, ABUTTING PROPERTIES<br>NUMBER(S).  |  | Appendix A   |  |
| 4.                | ONE (1) PAPER COPY AND TWO (2) CO<br>VOLUNTARY REMEDIATION PLAN IN A<br>FORMAT (PDF).                                      |  |  |  |
| 5.                |  | on to the extent known at the time of all preliminary conceptual site model ation plan with a table of delineation is, and figures (no more than 10 pages, and subsurface setting, the known or how contamination might move within health and ecological receptors, and the ways that may exist at the site; the she investigation and remediation just be included in each semi-annual by the participant; a PROJECTED ation and remediation of the site, and update the schedule in each semi-scribing implementation of the plan chart format is preferred for the | Pgs 6,7, 8 and 9<br>Appendix B,<br>Appendix C<br>and Appendix<br>D |  |
|                   | the results reported in the participant's the director. The director may extend t milestones in the participant's plan who | next applicable semi-annual reports to   |  |  |

| 5.a. | Within the first 12 months after enrollment, the participant must complete horizontal delineation of the release and associated constituents of concern on property where access is available at the time of enrollment;  | Appendix D |
|------|---|------------|
| 5.b. | Within the first 24 months after enrollment, the participant must complete horizontal delineation of the release and associated constituents of concern extending onto property for which access was not available at the time of enrollment;   | Appendix D |
| 5.c. | Within 30 months after enrollment, the participant must update the site CSM to include vertical delineation, finalize the remediation plan and provide a preliminary cost estimate for implementation of remediation and associated continuing actions; and   | Appendix D |
| 5.d. | Within 60 months after enrollment, the participant must submit the compliance status report required under the VRP, including the requisite certifications.   | Appendix D |
| 6.   | SIGNED AND SEALED PE/PG CERTIFICATION AND SUPPORTING DOCUMENTATION:  "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  No. 10957  PROFESSIONAL: | Appendix E |

#### Background

The subject site is located at 3796 Flat Shoals Parkway in Decatur, Georgia, just south of Interstate 285 as shown on Figure 1 in Appendix B. The approximate one-half acre property encompasses a one-story concrete block building constructed in 1972 and measuring 80 feet by 25 feet. Refer to Figure 2 in Appendix B. Currently, the facility is operated as a commercial auto repair shop. However, dry cleaning operations were conducted from approximately 1973 until the late 1990s. A legal description of the property and tax map including adjoining parcels are included in Appendix A.

The property was listed on the Hazardous Site Inventory (HSI) in April 2008 as HSI #10890 for a "known release of Tetrachloroethene in soil at levels exceeding the reportable quantity." Listing of the site on the HSI was based on the result from one soil test on the adjacent property to the south, Parkway Plaza convenience store, which has been sub-listed. A soil sample was collected at a depth of 4 feet from a soil boring designated EB-1 drilled near the common property boundary. Laboratory analysis detected a concentration of tetrachloroethene at 0.260 mg/kg in the soil sample, just above the notification concentration of 0.18 mg/kg. Refer to Figure 3, for the relative positions of the two properties and the location of EB-1.

#### **Initial Site Assessment**

The initial assessment activities will be performed first to establish that soil and/or groundwater contamination actually occurs on the subject property and then to delineate the lateral and vertical extent of impacts to soil and groundwater, if applicable. Therefore, a subsurface environmental sampling program is proposed consisting of one or more rounds of sampling and testing through an iterative process at selected strategic locations.

To check for regulated impacts to soil and groundwater on the Site, an initial soil sampling program will be conducted, to be followed by analysis of groundwater conditions as indicated. Specifically, the initial investigation will consist of advancing a total of 9 soil borings on the subject property, 5 of which will be located inside the on-Site building and 4 will be located to the south of the building, and 3 soil borings on the adjacent Parkway Plaza convenience property.

Soil samples will be collected from various depths using accepted techniques and protocols and field screened for organic vapors using a photoionization detector (PID). The soil samples will be

placed in pre-cleaned, laboratory provided containers, packed on ice, and transported under chain-of-custody protocol to a selected laboratory for analyses. The selected samples will be tested for the presence of volatile organic compounds (VOCs, EPA Method 8260B), polynuclear aromatic hydrocarbons (PAHs, EPA Method 8270C) and metals (using EPA Methods 6010/7471).

Groundwater conditions will be investigated, as appropriate, depending on the results of the soil sampling and upon the agency's further guidance regarding procedures for the determination called for under O.C.G.A § 12-8-107(g)(2). The soil data will be used to develop the scope of groundwater assessment, including the location and number of monitoring wells. Based on drilling conditions encountered during the assessment of the Parkway Plaza convenience property, drilling into rock may be necessary to install monitoring wells.

#### Site Delineation Concentration Criteria

Based on the results of a subsurface investigation on the adjacent property to the south, Parkway Plaza convenience store, the Constituents of Concern (COCs), at this time, appear to be isolated to tetrachloroethene only. In accordance with O.C.G.A. § 12-8-108(1), the current soil delineation concentration for tetrachloroethene will be the default Type 1 Risk Reduction Standard of 0.50 mg/kg.

However, as previously mentioned, a subsurface environmental sampling program will be performed at the Site and collected samples will be analyzed for VOCs, PAHs and metals. If additional COCs are identified in soil and/or groundwater at the Site during the course of future assessment activities, Sandy Head will update the Site Delineation Concentration Criteria which may include the use of one or more of the delineation criteria listed in O.C.G.A. § 12-8-108.

#### Conceptual Site Model

A Conceptual Site Model has been prepared using the limited data available at this time, and will be updated as a more thorough understanding of the subsurface conditions are assimilated. Refer to Appendix C.

Five borings drilled on the Plaza Parkway property (EB-1 through EB-5) encountered a layer of pavement underlain by some fill soil and residual soil transitioning to partially weather rock. Drilling refusal was encountered between 5 and 13 feet deep. No groundwater was encountered during drilling in January 2008.

Based on a large rock outcrop on the B&L property, the pavement covering much of the Site and shallow drilling refusal encountered on the Parkway Plaza property, the soil stratum is relatively thin and groundwater may not occur above the bedrock level.

#### **Proposed Corrective Action**

As previously mentioned, an initial subsurface assessment program will be performed first to establish that contamination actually occurs on the subject property at levels above applicable RRS and then to delineate the lateral and vertical extent of impacts which exceed the delineation standards. If impacts are identified on Site which exceed applicable cleanup standards, Sandy Head will perform remedial action to achieve compliance with applicable criteria. The following corrective action alternatives will be evaluated:

- Fate and transport modeling to demonstrate compliance with applicable cleanup standards,
- Soil excavation and off-Site disposal at a pre-approved disposal facility permitted to accept the designated waste,
- In-situ treatment, such as chemical oxidation for reductive dechlorination,
- Vapor extraction, with or without thermal enhancement.

#### Potential Receptors and Exposure Pathways

The subject Site is located in an area of commercial and multi-family residential development. Some common potential receptors in such areas include on-Site workers, local residents, surface water bodies and wetland areas and drinking water wells. Following the results of the subsurface assessment activities, an environmental exposure assessment will be conducted to better define the potential receptors and exposure pathways.

#### Schedule and Future Submittals

A Gantt Chart has been prepared in accordance with EPD's revised application process and is presented in Appendix D. Upon acceptance of this application, Sandy Head will proceed with the planned initial assessment activities. A semi-annual report along with an updated Conceptual Site Model will be submitted within 6 months of acceptance and every 6 months thereafter throughout the duration of this project.

Additionally, as requested by the EPD, Sandy Head has contacted the owner of the adjacent Parkway Plaza property in order to obtain access and/or add it as a VRP property. However, an executed agreement has not been finalized at this time. Therefore, Sandy Head will address the adjacent Parkway Plaza property and any other property that proves to be impacted by a release per item 5.b of the checklist and the attached GANTT schedule.

#### O.C.G.A. § 12-8-107(g) Determination

As previously indicated, Sandy Head requests reconsideration pursuant to O.C.G.A. § 12-8-107(g)(1) of the agency's determination that a release of a reportable quantity existed at the subject property at the time it was initially placed on the Hazardous Site Inventory. Sandy Head will submit the detailed basis for that request within 30 days of acceptance into the VRP.

Additionally, Sandy Head believes it should not be required to perform corrective action or certify compliance with groundwater pursuant to O.C.G.A. § 12-8-107(g)(2). In support, included in Appendix F is EPD's March 3, 2008 listing memo which shows there could not be a release of a reportable quantity to groundwater due to the absence of a drinking water receptor within the relevant distance. Sandy Head requests further guidance on what, if any, additional showing EPD believes is required.

APPENDIX A
WARRANTY DEED AND TAX PLAT MAP

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| STATE OF GEORGIA, County of Dekalb  |   |
| THIS INDENTURE, Made this // day of Januar  |   |
|   |   |
| Year of Our Lord One Thousand Nine Hundred and Seventy Ti   |   |
| JOAN GOWER STONE and MARY JEAN GOWER WRIGHT   |   |
| of the State of Georgia and County of Sexulli-  | of the first part, and  |
| باد بنا باین درون و وسین باید از در در سالهٔ نیر و باید از نامین شده نیان باید و |   |
| of the State of Georgia and County of   | of the second part.   |
| WITNESSETH: That the said part ies of the first part, for   |   |
| sum of TEN (\$10.00) and other valuable consider  | Dollars,  |
| in hand paid, at and before the sealing and delivery of these prese   | nts, the receipt of which is  |
| hereby acknowledged, ha Ve. granted, bargained, sold and conv   |   |
| do grant, bargain, sell and convey unto the said party o  |   |
| heirs and assigns, all that tract or parcel of land lying and be of the 15th District of DeKalb County, Georgia   | a, and being more   |
| particularly described as follows:  To arrive at the true point of beginning.   | begin of the congrets   |
| monument located on the south side of Interstate the intersection of the northeast side of Flat   | ate Highway No. 285 and   |
| thence south 22° 00 minutes east, a distance of the hundredths (89.70)ft.to a concrete monument   | of eighty nine and seven  |
| east side of Flat Shoals Road at the end of the running thence south 36° 49 minutes east along  | ae Limited Access: and  |
| of-way line of Flat Shoals Road, a distance of ninety hundredths (201.90) feet to an iron pir   | f two hundred one and   |
| of beginning.   | · ; :   |
| From said true point of beginning, running OO minutes east, a distance of two hundred fit   | ng thence south 89°   |
| 00 minutes east, a distance of two hundred fir dredths (253.04) feet to an iron pin; running minutes east, a distance of eighty (80.0) feet   | thence south 36° 49   |
| running thence north 89° 00 minutes west, a diffifty three and four hundredths (253.04) feet  | istance of two hundred  |
| of the northeast right-of-way line of Flat Shorth 36° 49 minutes west along the northeast   | oals Road; running then   |
| LVFiat Shoals Road, a distance of eighty (80.0) beginning; containing 0.367 acres, according to   | feet to the point of  |
| Joe W. Arnold, III, Registered Land Surveyor,   | dated December 10, 1969   |
| Subject to easements and restrictions of also to 1973 advalorem taxes due DeKalb County   | record, if any. Subject   |
| area to 1979 anvaronem vares une herarn ounny   | A GEOTETT   |
|   |   |
| Cier 7  |   |
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| \$ 35,00<br>Paid /-//-7a  | <u>.</u><br>3   |
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AND THE SAID part ies of the first part, for their heirs, executors and administrators, will warrant and forever defend the right and title to the above described property, unto the said part Y of the second part, its heirs and assigns, against the claims of all persons whomsoever.

IN WITNESS WHEREOF, the said part 105 of the first part ha Ve hereunto set the ir han Sand seal 5 , the day and year above written.

Signed, sealed and delivered in presence of:

BARRY J. WIENER
Notary Public, Georgia State at Large
My Commission Expires Nov. 8, 1976

Soan Gower Stone (Seal)

Wean Gower Wright

\_(Seal)

PUBLIC

BOOK 2941 PAGE 123

WARRANTY DEED

(Long Form)

(Long Form)

JOAN GOWER STONE and
MART JEAN GOWER WRIGHT

TO

SANDY HEAD, INC.

GEORGIA, County of DEKAID

GEORGIA, DEVALE COUNTY

GEORGIA, DEVALE COUNTY

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6/17/2005 Editos PH

Linda Cener

(Cask of Superior Does)

Deklard County: Georgis

Ream Recorded Documentio: DURROPORS/SORRESON ROPEWELL LLC SUM/Old Hillandide Terry Sorie-160 Editionic Georgic 3003; TROMODIL Lerry & Soon Enterprises. Inc.

LIMITED WARRANTY DEED

STATE OF GEORGIA.

FILE #: 0800003

THIS INDENTURE made this 6th day of June, 2002, between twory Excen, Sr. of the County of Belkhilb and Buis of Theorgia, as purty or parties of the instepart, hereinunder called Grantor, and Jerry & Sour Enterprises, Inc. as purty or parties of the second part, hereinafter called Grantee (the words "Grantor" and "Grantee" to include their respective heirs, successors and assigns where the context requires or permits).

WITNESSETH that: Granton for and in consideration of the sum of TEN AND NO/100 DOLLARS (\$10:00) and other good and valuable considerations in hand paid, at and before the scaling and delivery of these presents, the receipt whereof is hereby acknowledged, has granted, bargained, sold, allened, conveyed and confirmed, and by these presents does grant, bargain, soll, alien, convey and confirm unto the said Grantes.

All that treet or parcel of land tyleg and being in Land Lot 89 of the 18th District, DeKalb County, Georgia, and being more particularly described as follows:

Beginning at a point on the morthesteriy right-of-way of Flat Shouls Road, (State Route 185), 281.7 feet southersterly, as measured along the northesterly right-of-way of Flat Shouls Road, from the nouthersyllimit of access and right-of-way at 1-25, said point of beginning atto being the continuent corner of property now or formarily owned by L. J. Gower, a unning thence easterly along the north-boundary of said Gower, property 253.1 feet to a point, thence southerly 100 feet to a point for the north-easterly 150 feet and the north-easterly right-of-way of Flat Shouls Road which is 163.3 feet south-easterly, as measured along the north-easterly right-of-way of Flat Shouls Road from the point of beginning being improved property and having a non-story brick building decreed there on, and being known at 2806 Flat Shouls Farkway according to the present system of numbering in DeKaib-County, Georgia.

This Dood, is given subject to all easements and restrictions of record.

TO HAVE AND TO HOLD the said tract or parcel of land, together with all and singular the rights, members and appartenences thereof, to the same being, balonging or in anywise appearaining, to the only proper use, benefit and behoof of the said Grantec, forever in FEE/SLMPLE.

AND THE SAID Grantor will warrant and forever defend the right and title to the above described property unto the said Grantee against the claims of all persons by, through and under the above named grantor.

IN WITNESS WHEREOF, Granter has becaunto seggranter's hand and seal this day and year first above wefinen.

Signed, scaled and delivered in presence of:

Avory Bacon, Sr.

Antititions,

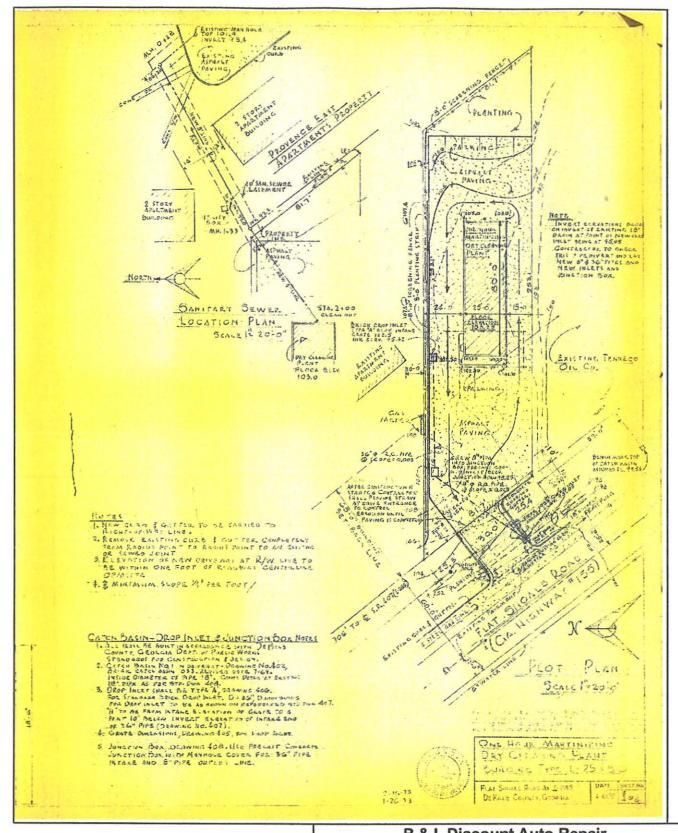
TERSTATE HWY 28 No. 1590 ENGINEER SURVEYOR PLAN OF PROPERTY FOR: SANDY HEAD, INC. In my opinion, this plat is a correct representation of the land platted and LAND LOT 89 - 15 TH DISTRICT has been prepared in conformity with DEKALB COUNTY, GA. the minimum standards and requirements JOE W. ARNOLD CO. of law. ENGINEERS & SURVEYORS

Manuage Ga. Assn. Reg. Land Surveyors

ATLANTA: GA.

SCALE: 1"=100' OCT. 10,1972

APPENDIX B
FIGURES



## **B & L Discount Auto Repair**

#### Site Plan

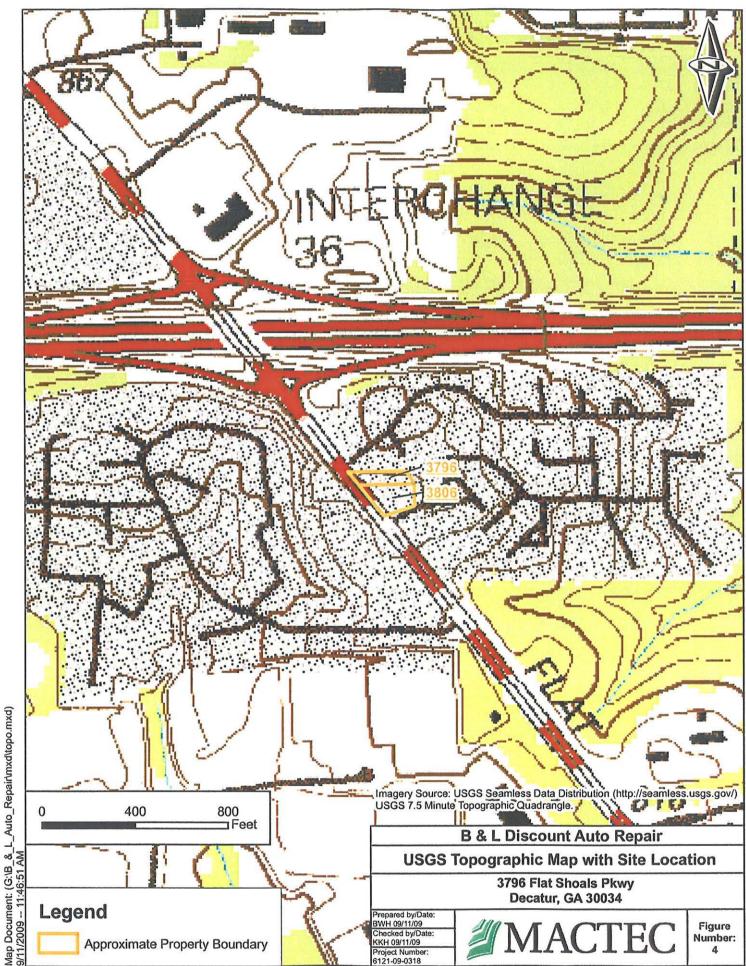
3796 Flat Shoals Pkwy Decatur, GA 30034

Prepared by/Date: BWH 09/11/09 Checked by/Date: KKH 09/11/09 Project Number: 6121-09-0318



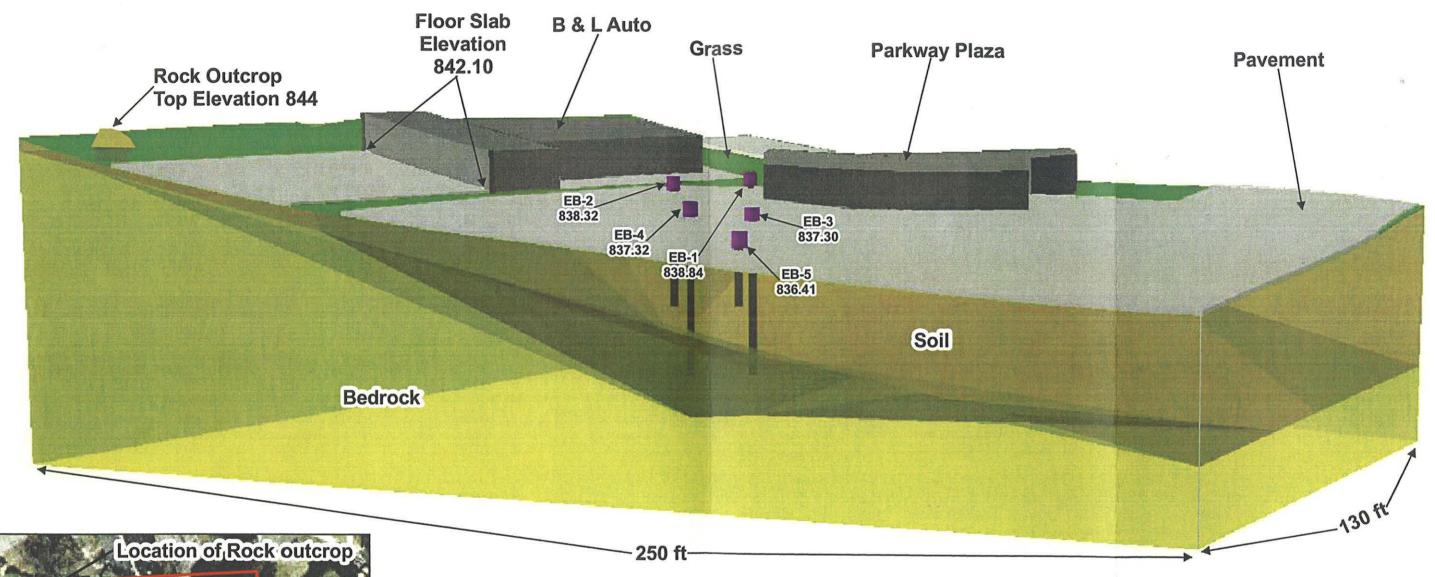
Figure Number:

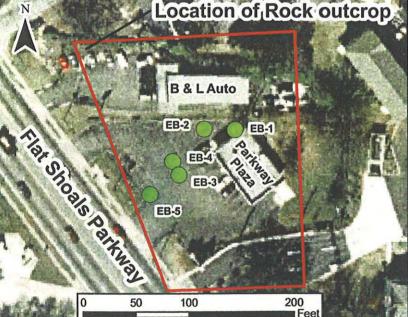
Map Document: (G:\B\_&\_L\_Auto\_Repair\mxd\aerial.mxd) 9/11/2009 -- 11:45:59 AM



APPENDIX C
CONCEPTUAL SITE MODEL

## Conceptual Rendering of Geology Scale Varies in This Perspective Vertical Exagerration X 3





# **B & L Discount Auto Repair**

# **Aerial Photograph of Site and Vicinity**

3796 Flat Shoals Pkwy Decatur, GA 30034

Prepared by/Date: THP 5/13/10

Checked by/Date: CTF 5/13/10

Project Number: 6121-09-0318



Figure Number:

Map Document: (G:\3796 Flat Shoals Pkwyiram: 5/13/2010 -- 11:28:45 AM

APPENDIX D
GANTT SCHEDULE

| ID  |   |           |          |           | t Auto - Schedule for Application Form and Checklist Submittal  |
|-----|---|-----------|----------|-----------|---|
| - 1 | Task Name   | Duration  | Start    | Finish    | 2010 2011 2012 2013 2014 2015   |
|     |   |           |          |           | A S O N D J F M A M J J A S O N D J F M A M J J A S O N D J F M A M J J A S O N D J F M A M J J A S O N D J F M A M J J |
|     | Submit request for reconsideration of the RQSM score pursuant to O.C.G.A. § 12-8-107(g)(1)  | 30 days   | 8/2/2010 | 8/31/2010 | 0 🔷 8/31  |
| 2   | Perform initial soil and groundwater assessment program   | 6 months  | 8/2/2010 | 2/2/2011  |   |
| 3   | *Submit 1st Semi-Annual Report with updated CSM   |           | 2/2/2011 | 2/2/2011  | 2/11  |
|     | Perform subsurface assessment program to complete horizontal delineation of on-Site impacts, if applicable                                    | 6 months  | 2/2/2011 | 8/2/2011  |   |
|     | Perform subsurface assessment program to complete horizontal delineation of any off-Site impacts  | 12 months | 8/2/2011 | 8/2/2012  |   |
|     | Complete vertical delineation, update CSM, finalize plan and<br>provide preliminary cost estimate for remediation activities, if<br>necessary | 6 months  | 8/2/2012 | 2/4/2013  |   |
| 7   | Submit Compliance Status Report   | 30 months | 2/4/2013 | 8/4/2015  |   |
|     | * - A Semi-Annual Report along with an updated CSM will be<br>submitted as prescribed in the VRP Application and Checklist                    |           |          |           |   |
|     |   |           |          |           |   |
|     |   |           |          | iel       |   |
| Pro | oject; B & L Discount Auto Schedule   | Task      |          | : *)      |   |
| Dat | ate: 5/13/2010  | Task [    |          |           |   |

APPENDIX E
PE SUPPORTING DOCUMENTATION

# Charles T. Ferry, P.E. Summary of Hours and Services B&L Discount Auto Repair HSI Site No. 10890 MACTEC Project No. 6121-09-0318

Submittal to EPD dated 9/17/09
Voluntary Remediation Plan
21.5 hours invoiced between 8/31/09 and 9/18/09
Services included document review, site reconnaissance, meeting with applicant, preparation of submittal

Submittal to EPD dated 2/5/10 Application Form and Checklist, and Schedule 4.5 hours invoiced between 1/13/10 and 2/3/10 Services included preparation of submittal

Submittal to EPD dated 5/13/10 Revised Application Form and Checklist, and Schedule 5.5 hours invoiced through 5/18/10 Services included direction of staff and review of submittal

Submittal to EPD dated 8/2/10
Revised Application Form and Checklist, and Schedule
3.5 hours to be invoiced through 8/2/10
Services included direction of staff and review of submittal

APPENDIX F
EPD HSI LISTING MEMORANDUM DATED MARCH 3, 2008

## Georgia Departient of Natural Resources

2 Martin Luther King, Jr. Dr., Suite 1462 East, Atlanta, Georgia 30334
Noel Holcomb, Commissioner

Noel Holcomb, Commissioner Environmental Protection Division Carol A. Couch, Ph.D., Director 404/657-8600

March 3, 2008

#### MEMORANDUM

TO:

Alex Cleary, Program Manager oww

THROUGH:

David Brownlee, Unit Coordinator

FROM:

Renee Hill, Environmental Specialist 3 kh

SUBJECT:

B & L Auto Repair

3796 Flat Shoais Parkway

Decatur, DeKalb County, Georgia 30034

**HSI Listing Recommendation** 

Discover Realty, LLC submitted a release notification dated February 11, 2008 for a parcel of property, Parkway Plaza, located at 3806 Flat Shoals Parkway, Decatur, DeKalb County, Georgia. The property is presently developed with a 1,920 square foot commercial building housing two tenants, Dream Tax Service and a convenience store/delicatessen known as the Fun Food Depot. The site covers approximately 0.61 acres.

In January 2008, Corporate Environmental Risk Management (CERM) performed a Phase I Environmental Site Assessment (ESA) for Citizens Trust Bank Commercial Lending Department. In the ESA, CERM identified a former adjacent and upgradient dry cleaning facility, located at 3796 Flat Shoals Parkway that used tetrachloroethene as its dry-cleaning solvent. The ESA stated that the former dry cleaner had been issued numerous notices of violation relative to record-keeping and chemical storage. In order to verify this claim, Generator Compliance Program's files for One Hour Marlene Cleaners, formerly located at 3796 Flat Shoals Parkway Decatur, DeKalb County, Georgia, were reviewed. The file review revealed several record keeping violations. The ESA also revealed that a gas station formerly operated on site for an unknown period of time.

In January 2008, GLE was hired to perform a Limited Phase II Environmental Assessment (EA) to assess soil and groundwater underlying the site. Six soil samples were collected using direct push technology (DPT). No groundwater samples were collected due to DPT refusal on partially weathered rock prior to reaching the groundwater table. Tetrachloroethene was detected in one of the six soil samples above the notification concentration (NC). The following regulated substances were detected in soil above the detection limit but below the NC: Naphthalene, 1-Methylnaphthalene, 2-Methylnaphthalene, Phenanthrene, Fluoranthene, Pyrene, Benzo(a)anthracene, Chrysene, Benzo(b)fluoranthene, Benzo(a)pyrene, Benzo(g,h,i)perylene, Ethylbenzene, m,p-Xylene, and o-Xylene.

On February 28, 2008 EPD conducted a listing inspection of the Parkway Plaza site. B & L Auto Repair currently occupies the former One Hour Marlene Cleaners property, which is listed on the Release Notification form as the suspected source for the Tetrachloroethene contamination. B & L Auto Repair is located adjacent to and topographically up gradient from Parkway Plaza (see Trip Report photo #s 3 and 7). Based on the site inspection and the information provided in the Release Notification, EPD believes that B & L Auto Repair is the source of contamination for the Parkway Plaza property. The RQSM scores for B & L Auto Repair are provided below.

The groundwater pathway was scored as a suspected release (10) of Tetrachloroethene (4) above the MCL of .005 mg/L (4), due to soil contamination (260 ppb) above the notification concentration at soil boring location SS-1@ 4 feet. No other chemicals of concern were detected at SS-1. The site has very good containment due to asphalt cover (0), and the physical state of the tetrachloroethene was liquid (3). The susceptibility rating was assigned a value of (6) since the site is located in a zone of most significant ground-water recharge according to Hydrologic Atlas 20.

B & L Auto Repair
HSI Listing Recommendation March 3, 2008
Page 2

No drinking water wells were identified within 1-mile of the property, so a distance of 1-2 miles was used to be conservative (4). Scoring the property for the groundwater pathway results in a score of 1.08, which does not exceed the threshold criteria.

The on-site pathway was scored as having unlimited access (4) with a known release (25) of Tetrachloroethene (4) and very good containment due to asphalt cover (0). The nearest resident, Orchard Walk Apartments, is less than 300 feet from the property (8). Scoring the property for the on-site pathway results in a score of 24.69, which exceeds the threshold criteria.

The on-site exposure pathway exceeds the threshold criteria; therefore, I recommend that the B & L Auto Repair be listed on the Hazardous Site Inventory and Parkway Plaza be sublisted.

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