

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

December 17, 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 # 6 – August 28, 2015
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 recognizes and appreciates the ongoing efforts that have been undertaken to characterize and address soil and groundwater at the site. Subsequent to our review of this document, the supplemental isoconcentration figures, and the conference call that was held on October 7, 2015, EPD offers the following comments which should be addressed pursuant to the Act.

1. EPD concurs that the residuum groundwater plume has been delineated in the following directions: 1.) eastern extent based on MW-22 and MW-23; 2.) northern extent based on MW-14A and MW-7B; 3.) western extent, based on site data and cross sections demonstrating the termination of the residuum near the headwaters of the creek; and 4) southern extent based on MW-21B and MW-6A/B.
2. EPD concurs that the bedrock groundwater plume has been delineated in the following directions: 1.) eastern extent based on MW-13C; 2.) northern extent based on MW-1C and MW-7C; and 3.) southern extent, based on based on MW-5C and MW-21C.

Based on Section 4.3 of the Report, EPD also concurs that delineation of groundwater impacts in bedrock to the west and vertically have been satisfactorily addressed for this site in accordance with Section 12-8-108(9) of the Act.

3. As noted in EPD's June 28, 2012 VIRP approval letter and subsequent letters, groundwater contamination is known to exist on several abutting properties, including, but not necessarily limited to, the Al-Karim Partnership property (herein referred to as the "Dunkin Donuts" property), Clay Prop VI LLC property (i.e., USA Payday property), Lumsden Properties LLC property (i.e., Prax Air/Pye Barker Welding property), HOH Enterprises (i.e., Flint River Shopping Center), and Sonu Enterprises, Inc. property (i.e., Citgo property). In previous correspondence, Ashland has been directed to apply to EPD to include all known impacted properties as qualifying properties under the Act or notify EPD that the known impacted properties will not be included in the program. Please ensure these properties are addressed in the forthcoming groundwater remedial plan and proceed with the streamlined Uniform Environmental Covenants.

4. The progress report notes that the July 2015 groundwater data will be used to complete an initial vapor intrusion screening assessment. As noted in Comment #4 of EPD's June 28, 2012 letter this should be completed for all structures noted above which overlay documented groundwater contamination.
5. A variety of items were noted in the field sampling logs which are not compliant with 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 as noted in EPD's February 20, 2015 correspondence, including the following: 1.) the incorrect location (too high) of the pumps relative to the screened interval during purging; 2.) the use of a bailer to sample for volatile organic compounds (VOCs) in MW-1A in July 2015; and 3.) no turbidity readings in January 2015 and high turbidity readings in a number of wells in July. Please correct these deficiencies in subsequent groundwater sampling.

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 recommends that the forthcoming January 2016 sampling results be included in the final remedy design. Therefore, we anticipate receipt of the next Semi-Annual Progress Report, which will include the final remedial plan for groundwater and the final CSM, no later than March 1, 2016. If you have any questions regarding this matter, please contact Robin Futch, PG, at 404-657-8686.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

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

File: HSI Site 10798

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