

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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

Richard E. Dunn, Director

(404) 656-8600

August 22, 2016

VIA ELECTRONIC AND REGULAR MAIL

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

Re: Groundwater Corrective Action Plan – March 17, 2016
Voluntary Remediation Program Semi-Annual Progress Report # 8 – June 28, 2016
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 have been submitted for the Tara Shopping Center site in accordance with the Voluntary Remediation Program Act (the Act). EPD commends both Ashland and their Consultant for the thorough documentation of the conceptual site model and the receptor evaluation presented in the groundwater Corrective Action Plan (CAP).

The CAP proposes the following corrective actions to achieve compliance with VRP Standards on Clayton County Tax Parcel ID No. 13242D B001 and surrounding impacted properties:

Groundwater

- **Source Area** – Placement of a Uniform Environmental Covenant (UEC), recorded on August 12, 2015, prohibiting the use or extraction of all groundwater systems underlying the site for drinking water purposes.
- **Dissolved Plume**
 - Development and recording of Streamlined UECs on several parcels south and west-southwest of the site. These parcels include: 13242D B001A; 13242D B007 AND B007Z; 13242D B009 and B009Z (South) and 13242D B002 and B002Z; 13242 A016 and A016A; and 13242D A0152 AND 13242D A001 (West-Southwest)
 - Groundwater sampling of monitoring wells in Zones A and B, as specified in the CAP, annually for 3 years for volatile organic compounds (VOCs). In addition, Zone C wells, including MW-15C, will be monitored semi-annually for VOCs for 3 years. After the third annual sampling event, statistical trend analysis of the data set will be conducted to evaluate the need for additional groundwater sampling.
 - Further analysis of the potential vapor intrusion pathway.

- **Surface Water** - Four surface water locations (OF-2, SS-1, SS-2 and SS-3) will be sampled for VOCs on the same schedule as Zone C.

EPD has determined the corrective action plan is complete, and subject to the conditions outlined below, hereby approves the proposed corrective action plan and associated schedule.

1. The Risk Assessment Unit conducted a review of the SLERA and the surface water risk assessment memo and based on that review, the SLERA and surface water risk assessment memo are acceptable and approved.
 - a. Please note that the recommended site-specific risk target levels for the child residential receptor should be the values presented in Table 9 for 120 days (2-6) and 160 days (6-16).
2. As previously noted by EPD, the remedial criteria for surface water impacts will be the current Georgia In Stream Water Quality Standards (ISWQS) as provided in Section 391-3-6-.03(5) of the Georgia Water Quality Control Act. The surface water monitoring proposed will help with an evaluation of the effects from the source area corrective action with the goal to meet ISWQS that are applicable at the time of cessation of the proposed monitoring.
3. For the vapor intrusion scope of work, please include the following activities: 1.) collection of soil gas samples, with sample collection intervals at 2.5 to 3-feet below ground surface (bgs) and from an interval just above the water table; 2.) analysis of the samples by method TO-15; 3) a well-defined contingency plan for next steps, based on soil gas results; and 4.) analysis of the data via the VISL calculator.
4. EPD approves the monitoring wells to be abandoned as proposed in Table 5. The only exceptions are MW-22A & B and MW-23A & B. Please collect one additional round of samples from these wells before abandoning them. Please note that the wells should be abandoned in accordance with the Georgia Water Well Standards Act and EPA's guidance document, Design and Installation of Monitoring Wells, USEPA SESDGUID-101-R1 (Revised January 29, 2013), Section 2.8.
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 December 17, 2015 correspondence, including the following: 1.) the incorrect location (too low) of the pumps relative to the screened interval during purging; 2.) excessive drawdown for low flow/low stress sampling; 3) incomplete field sampling notes; and 4.) elevated turbidity readings in a number of wells in October. Please correct these deficiencies in subsequent groundwater sampling events.

The above comments should be addressed in order to demonstrate compliance with the provisions, purposes, standards, and policies of the Act.

Please continue to submit Semi-Annual VRP Progress Reports as described in the VRP. EPD anticipates receipt of the next Semi-Annual VRP Progress Report by December 28, 2016. However, the vapor intrusion work plan and a status update may be submitted by November 30, 2016 in lieu of submitting a Semi-Annual VRP Progress Report in December. In addition, please confirm that the Compliance Status Report is on track for submittal by June 28, 2017. If you have any questions, please contact Robin Futch P.G. of the Response and Remediation Program 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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