

Georgia Department of Natural Resources

Environmental Protection Division

Reply To:
Response and Remediation Program
2 Martin Luther King, Jr. Drive, S.E.
Suite 1054, East Tower
Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

2 Martin Luther King, Jr. Dr., S.E., Suite 1456 East, Atlanta, Georgia 30334
Judson H. Turner, Director
Phone: (404) 656-4713 FAX: (404) 651-9425

January 31, 2014

VIA EMAIL & REGULAR MAIL

Newnan Lofts Limited Partnership
c/o Mr. James R. Borders
817 West Peachtree Street NW, Suite 400
Atlanta, Georgia 30308

Re: August 2013 Semi-Annual Progress Report
Newnan Lofts Apartment Complex
110 Field Street, Newnan, Coweta County, Georgia

Dear Mr. Borders:

The Georgia Environmental Protection Division (EPD) has received the August 2013, 4th Semi-Annual Progress Report (August 2013 Report) and correspondence dated December 6, 2013, which has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. After completing a review of the referenced document, EPD has prepared the following comments:

Ecological and Surface Water Pathway

- 1) Absent any conclusive negative impacts to ecological receptors or surface water impacts above background levels, it is EPD's professional judgment that any corrective action for the pond would do more harm than good at the present. However, EPD maintains that the associated environmental covenant for the property should include provisions for future maintenance and operation of the pond including the disposal of sediment contamination if future dredging is required and minimization of excessive discharge of silt from pond to the downgradient stream. Please provide a stormwater management plan for the property that addresses the pond issues above that can be incorporated into the planned maintenance and monitoring plan.

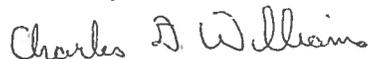
Other Comments

- 2) EPD concurs with the proposal for the excavation and offsite disposal of the upper one foot of soils in the HA-8 and BH-26 areas exceeding the Type 1 RRS. Please ensure that the VRP CSR includes the necessary data to certify horizontal and vertical delineation of the contaminants of concern in soil, including the confirmation sampling data from the excavated areas.
- 3) EPD continues to request additional characterization of the soil impacts north of BH-26. At a minimum, at least one sample should be collected from the uncovered area within the fence line north of BH-26, as there is no data confirming the extent of impacts between this BH-26 location and the excavation area around HA-9.

- 4) According to Section 2.3 of the August 2013 Report, poplar trees were being installed within the secured fenced areas for phytoremediation of various metals and PAHs in soils. EPD recommends the use of mixed grasses in place of or in combination with the poplar trees to address this component of the site remediation activities. Please ensure that the Environmental Inspection and Maintenance Plan (EIMP) includes verbiage that details the monitoring and maintenance of this “phytoscaping” vegetation in the applicable area(s) of the site along with a statement that the future replacement of this landscaping will include an equal or more beneficial technology that may be used to reduce or eliminate potential future exposure to impacted surface soils.
- 5) Please ensure that Figure 1 in Appendix D illustrates all designated Type 5 restricted access areas. This Figure should also be expanded to illustrate the entire extent of the property, including the northern fenced area and pond. In addition, please ensure that the EIMP includes the installation and maintenance of permanent markers for these designated “Type 5” areas.
- 6) Please ensure that the EIMP includes the monitoring and maintenance of the positive pressure ventilation system installed/attached to the crawl space of the main residential building.

A responses to EPD’s comments may be incorporated into the next semi-annual progress report due February 15, 2014. Should you have any question or concerns, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



Charles D. Williams

Program Manager

Response and Remediation Program

c: Bob Pyle, CRA
Les Oakes, King & Spalding

File: VRP Application 1278434253 – Newnan Lofts Apartment Complex