

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334

Reply To:

Response and Remediation Program
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Suite 1462, East Tower
Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

Mark Williams, Commissioner
Environmental Protection Division
F. Allen Barnes, Director
Land Protection Branch
Mark Smith, Branch Chief

FILE COPY

April 15, 2011

VIA E-MAIL AND REGULAR MAIL

Sandy Head Incorporated
c/o Mr. Eric Wallens, Administrator
Post Office Box 99501
Seattle, WA 98139-0501

Re: 1st Semi-Annual Progress Report dated March 21, 2011
B&L Discount Auto Repair, HSI Site No. 10890
3769 Flat Shoals Parkway, Decatur, DeKalb County, Georgia
Tax Parcel ID 15-089-02-005

Dear Mr. Wallens:

The Georgia Environmental Protection Division (EPD) has received and reviewed the 1st Semi-Annual Progress Report dated March 21, 2011 for the B&L Discount Auto Repair site in Decatur, Georgia. EPD provides the following comments:

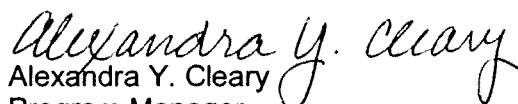
1. The detection of soil contamination on the qualifying property necessitates that the conceptual site model (CSM) for the property be revised to incorporate the direct contact pathway and the vapor intrusion pathway. Furthermore, future progress reports should revise the CSM to reflect the most recently collected data for the site that is being submitted in the progress report.
2. Additional soil sampling is needed around locations SB-2, SB-3, SB-4 and SB-8 to completely delineate the soil contamination on the qualifying property. The next progress report due September 21, 2011 must fully delineate horizontally soil contamination on the qualifying property.
3. Additional soil samples need to be collected at sample location SB-3 to delineate the soil contamination at the site vertically. Vertical delineation of soil can be accomplished by either collecting additional soil samples or by the sampling of groundwater.
4. EPD cannot concur as yet with the statement on page 6 of the report that "this site should be treated as soil-only under the aforementioned guidelines." Groundwater needs to be investigated in order to determine if the site would list for the groundwater pathway using the Reportable Quantity Screening Method. In addition, groundwater contamination may potentially affect both the surface water pathway and the vapor intrusion pathway.
5. According to the approved VIRP application, investigations on the qualifying property were to include sampling for VOCs, PAHs and metals. However, the most recent round of sampling did not include PAHs or metals.

6. Delineation criteria must be proposed for the newly detected regulated substances at the qualifying property. At this time, only tetrachloroethene has an approved delineation criteria.
7. EPD has not received financial assurance for the investigation and cleanup of the site as required by Condition 1 of EPD's September 21, 2010 approval letter.
8. Sandy Head, Inc. has not provided EPD a copy of the deed notice as required by EPD's letter dated October 22, 2010 changing the classification of the site from Class II to Class V.

EPD may, at its sole discretion, review and comment on documents submitted by Sandy Head, Inc. However, failure of EPD to respond to a submittal within any timeframe does not relieve Sandy Head, Inc. from complying with the provisions, purposes, standards and policies of the Voluntary Remediation Program Act.

Please address the above comments in the next Semi-Annual Progress Report due September 21, 2011. If you have any questions, please contact Mr. Yue Han of the Response and Remediation Program at (404) 657-8600.

Sincerely,


Alexandra Y. Cleary
Program Manager
Response and Remediation Program

c: Kimberly Phillips, Envirorisk Consultants, Inc.

File: HSI Site Number 10890

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