

Georgia Department of Natural Resources

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

Chris Clark, Commissioner

Environmental Protection Division

F. Allen Barnes, Director

Land Protection Branch

Mark Smith, Branch Chief

Reply To:

Response and Remediation Program
2 Martin Luther King, Jr. Drive, S.E.
Suite 1462, East Tower
Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

June 1, 2010

VIA E-MAIL AND REGULAR MAIL

Sandy Head Incorporated
c/o Mr. Eric Wallens, Administrator
Post Office Box 8895
Atlanta, Georgia 31106-0895

Re: Voluntary Remediation Plan and Application, May 13, 2010
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 reviewed the May 13, 2010, Voluntary Remediation Plan (VRP) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD cannot approve your voluntary remediation plan due to the following deficiencies:

Incomplete Application:

- EPD acknowledges you have submitted the updated application form and checklist requiring the submittal of a conceptual site model including a preliminary remediation plan with a table of delineation standards, etc. EPD has noted that the conceptual site model does not include a preliminary remediation plan (see following bullet), delineation standards, description of receptors, or exposure pathways, etc. and is therefore considered incomplete.

Remediation:

- The VRP does not propose any remediation. Sufficient data for both soil and groundwater should be obtained in order to propose a remedy for impacted media that will meet applicable risk reduction standards (RRS) or to certify to an applicable RRS.

Groundwater Data and Investigation:

- EPD has again noted that the VRP does not include any groundwater data nor does it propose obtaining any groundwater data. Pursuant to OCGA §12-8-107(g)(2), you must demonstrate that a reportable quantity does not exist for the groundwater pathway. Therefore, groundwater data must be collected and presented in the VRP.

EPD acknowledges this VRP application and the earlier application were submitted in lieu of a compliance status report requested in a letters dated January 16, 2009 and June 19, 2009 pursuant to the Georgia Rules for Hazardous Site Response. As both of these applications are incomplete, EPD is unable to accept Sandy Head Inc as a participant in the Voluntary Remediation Program. However, EPD is willing to extend the deadline until August 31, 2010 for submitting a revised VRP that addresses the deficiencies listed above. The revised VRP must also include the necessary documentation showing the inclusion of the Parkway Plaza property if it is also to be considered a qualifying property.

In the event that the Parkway Plaza property is not included as part of the VRP, a compliance status report for this property must be submitted by August 31, 2010. If a complete, revised, VRP including the results of the initial soil and groundwater (see 3rd bullet) investigation is not received by August 31, 2010, then the requirements pursuant to the Hazardous Site Response Act are no longer stayed, and Sandy Head Inc will be considered in violation of the Hazardous Site Response Act and associated Rules.

If you have any questions, please contact Mr. Yue Han of the Response and Remediation Program at (404) 657-8600.

Sincerely,



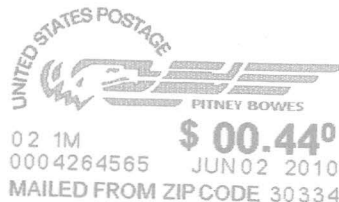
Mark Smith, Chief
Land Protection Branch

c: Charles T. Ferry, MACTEC

File: HSI Site Number 10890

Georgia Department of Natural Resources

Environmental Protection Division
Hazardous Waste Management Branch
Floyd Towers East
2 Martin Luther King, Jr. Drive, S.E.
Atlanta, GA 30334-9000



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c/o Eric W. Wallens, Administrator
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Atlanta, GA 31106-0895

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