

December 29, 2011

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Mr. Terry Stilman
Environmental Protection Agency On-Scene Coordinator
Region 4
61 Forsyth Street SW
Atlanta, Georgia 30303

Re: Zonolite Place – Sampling Addendum

Dear Mr. Stilman:

The purpose of this Addendum is to revise the sampling procedures outlined in Grace's approved September 26, 2011 Work Plan and the Sampling and Analysis Plan (SAP), Quality Assurance Project Plan (QAPP), and the Air Monitoring Plan for the Zonolite Place site in Atlanta, GA to account for the increased size of the site and removal/restoration of the drainage creek bank.

Sampling Prior to Restoration of the Drainage Creek Bank

During the removal action, asbestos-containing soil was found to extend into the current creek bank on the northern and western sides of the site. In order to remove the material, the creek bank requires excavation and subsequent replacement as quickly as possible to prevent flooding in the excavation. Flooding in the excavation would delay remediation activities and require the floodwaters to be contained and filtered.

The current clearance criteria in the approved Work Plan requires excavation of the waste pile until native soil is encountered, followed by bulk sampling and activity based sampling (ABS) prior to site restoration and backfill. ABS will be impractical to implement in the creek bank areas due to the wet soils and time constraints to restore the creek bank. A revised sampling plan for restoration of the creek bank is described below.

After excavating to native soils, soil in the area adjacent to the existing bank will be sampled. If the analytical results meet the clean-up criteria for the site (<0.25% asbestos), the excavation and restoration of the drainage creek bank will begin. If the analytical results fail the clean-up criteria, additional excavation will be conducted. Neither bulk samples nor activity based sampling will be performed underneath the creek bank under this Addendum. Bulk sampling to be performed adjacent to the creek bank will show that the native soil meets the clean-up criteria (<0.25% asbestos). Furthermore, areas where activity based sampling does not occur will be covered by more than two feet of clean soil and vegetation which is protective of human health and the environment.

Clearance Sampling Post Removal

Based on the increased size of the removal area and the post-removal planned use of the site, the following changes to the clearance sampling protocols are also requested.

Bulk Soil Sampling

Bulk soil sampling will be performed in the excavated areas prior to ABS sampling. Due to the increased size of the site requiring excavation, the grid size for the bulk sampling (other than the creek bank and immediately adjacent to the creek bank) will be increased to 100 feet by 100 feet. Each grid will then be subdivided into 50 feet by 50 feet sub grids. A composite sample will be collected from each 100 foot by 100 foot grid by collecting one aliquot from each sub-grid and compositing the aliquots to form the grid composite. The composite sample will then be submitted to the laboratory for analysis and the aliquots will be submitted for hold until results of the composite sample are received. If the analytical results from the composite sample exceed the clean-up criteria (<0.25% asbestos) then the individual aliquots will be analyzed.

Activity Based Sampling (ABS)

ABS will be specific to DeKalb County's planned future use of the site. Based on the anticipated post-removal use, ABS will be performed in the following areas:

1. The area where the community garden will be located;
2. Walking and biking trails; and
3. The area where the storm water detention will be installed.

The generic raking scenario will be used in the areas where gardening or digging will occur. The walking or biking scenario will be performed in the areas where the DeKalb County conceptual plan indicates these activities will occur.

One ABS sampling event will be performed in each of the three areas described above. Each ABS sampling event will be conducted by 3 participants wearing both a high volume and low volume air pump for a duration of 120 minutes each. The size of each ABS area to be sampled will be the entire area that has been excavated. The purpose of the multiple samples is to maintain data validity and reliability. ABS will not be performed on the restored drainage creek bank which has been covered with two feet of clean fill material.

If you have any questions regarding this Sampling Addendum, please contact Bob Marriam at (901) 820-2023.

Sincerely,



Robert J. Medler
Project Coordinator
Remedium Group, Inc.

cc: Kevin Eichinger - EPA
Lynne Gardner - Grace
Brent Jacobs - URS
John Johnson, Esquire - DeKalb County
Robert Marriam - Grace
Bill Miller - Grace
Jay White - URS