



Sent Via Federal Express

June 2, 2003

Ms. Jane Hendricks
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive
Suite 1462 East
Atlanta, Georgia 30334

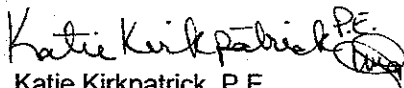
**SUBJECT: Proposed Amendments to Georgia's Rules for Hazardous Site
Response Act (HSRA), Chapter 391-3-19**

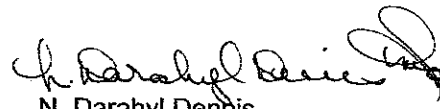
Dear Ms. Hendricks:

The Georgia Industry Environmental Coalition (GIEC) appreciates this most recent opportunity to provide EPD with the attached comments on its proposed amendments to the HSRA Rules. Please contact either of us if you have any questions.

Sincerely,

GEORGIA INDUSTRY ENVIRONMENTAL COALITION


Katie Kirkpatrick, P.E.
Vice Chair


N. Darahyl Dennis
Chair

cc: H. Reheis
M. Gottchalk
J. Kaduck
T. Cash

**GIEC Comments on the Proposed Amendments to
Georgia's Rules for Hazardous Site Response Act (HSRA), Chapter 391-3-19**

June 3, 2003

GIEC Supports Proposed Amendments

Members of the Georgia Industry Environmental Coalition, Inc.¹ (GIEC) welcome and encourage adoption of the changes to the HSRA Rules currently being proposed by the Hazardous Waste Management Branch of the Environmental Protection Division (EPD). We view these changes as an initial step towards making HSRA more cost-effective for the regulated community, while protecting human health and the environment. These changes may also relieve some of the growing financial burden on the Hazardous Waste Trust Fund.

GIEC's Hope for 2003 and 2004: More Substantive HSRA Reform

GIEC has always supported the HSRA statutory objective: to protect human health and the environment. We continue to seek continuing progress towards an integrated package of HSRA reforms:

- Employment of Realistic, Site-specific Exposure Scenarios and Science-based Risk Assessments;
- Establishment of Realistic, Risk-based Corrective Action Goals;
- Selection of Remedies Using the Most Cost-effective Blend of Cleanup, Engineering Controls and Institutional Controls;
- Incorporation of Scientific Risk Assessment Principles and a Reasonable Appeal Process in the Site Listing Process and Delisting Decisions; and
- Elimination of Unnecessary Data Requirements by Focusing Data Gathering on Factors that Affect Remediation Decisions.

GIEC is eager to continue discussions with EPD representatives and other interested HSRA stakeholders towards realizing a cost-effective HSRA program. During these difficult economic times, a cost-effective HSRA program will reduce demands on the Hazardous Waste Trust Fund and make private-sector brownfield redevelopment feasible at more locations across Georgia.

¹ GIEC is a not-for-profit membership organization of environmentally-regulated companies in Georgia who share the belief that environmental regulations can, and should, be both protective and cost-efficient. The mission of GIEC is to serve as a technically-based advocate for Georgia industry by promoting environmental regulations and policies that are founded on the protection of human health and the environment, sound science, and cost/benefit principles.

Member companies include: Alcan Aluminum Corporation; Arizona Chemical Company; Atlanta Gas Light Company; Colonial Terminals, Inc.; DSM Chemicals North America, Inc.; The Dow Chemical Company; Engelhard Corporation; General Electric Company; Georgia-Pacific Corporation; Georgia Power Company; Gold Kist Inc.; International Paper; Kerr-McGee Chemicals, LLC; Lockheed Martin Aeronautical Company; Merck & Company, Inc.; Mohawk Industries; Norfolk Southern Corporation; The Nutrasweet Company; Omnova Solutions, Inc.; Pharmacia; Southwire; Southern Aluminum Finishing Company; Thiele Kaolin Company; Weyerhaeuser Company; William L. Bonnell Company, Inc.