

# Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch  
2 Martin Luther King, Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334  
Judson H. Turner, Director  
Phone: (404) 657-8600; Fax (404) 657-0807

March 17, 2015

**FILE COPY**

## VIA E-MAIL AND REGULAR MAIL

AXA Equitable Life Insurance Company  
c/o Mr. Preston McFarland, Asset Manager  
Morgan Stanley Real Estate, Inc.  
3424 Peachtree Road, NE  
Suite 800  
Atlanta, Georgia 30326

RE: October 2014 VIRP Progress Report  
Former Vogue Cleaners, HSI Site No. 10394  
Martinez, Columbia County, Georgia 30907

Dear Mr. McFarland:

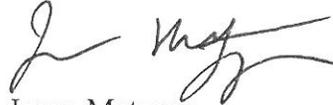
The Georgia Environmental Protection Division (EPD) has completed its review of the Voluntary Investigation and Remediation Plan (VIRP) Progress Report dated October 31, 2014. Our comments are provided below:

1. The October 2014 report indicated that localized ISCO injections are going to be conducted to address local rebound around monitoring well MW-8R followed by resampling of groundwater 45 days after injection and submittal of a final VCSR. Please note that more than one round of sampling may be necessary post-ISCO to monitor for rebound. Please provide laboratory analytical reports for all sampling events submitted within each Progress Report and include the complete August 2014 analytical report in the next submittal.
2. If the condition or depth of wells MW-8D, MW-13, and MW-6 are considered unusable for developing potentiometric contours then consideration should be given to replacing these wells if critical to the characterization and monitoring of the plume on-site.
3. MW-12D needs to be surged out and/or redeveloped and repairs made to the protective casing to prevent silting and runoff from the parking lot entering the well if it is critical to the characterization and monitoring of the plume on-site.
4. The Progress Report states that the VIRP compliance status report (CSR) will address EPD's May 30, 2014 Comment letter. Please respond in a response-to-comment (RTC) format to assist in expediting EPD's review of the associated submittal and to ensure that all comments are addressed. Responses may consist of references to written portions of a new submittal or new or *revised* tables, figures or other supporting documentation previously submitted to EPD.
5. A summary of professional hours is required with each Progress Report. This summary was not included in this Progress Report and should be included in subsequent reports.

Mr. Preston McFarland  
March 17, 2015  
Page 2

Please submit a Progress Report or a revised CSR which addresses the above comments and our previous comment letter by April 30, 2015 in accordance with the VIRP Semi-Annual reporting schedule. If you have any questions, please contact Montague McPherson of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Jason Metzger  
Unit Coordinator  
Response and Remediation Program

c: Dr. Harindorjit Singh  
Scott Klosinski, Columbia Square Investors, LLC  
Mark Mitchell, Genesis Project, Inc.

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