

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

December 3, 2015

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: Summary of Additional Voluntary Corrective Action Activity, September 21, 2015
Semi-Annual Progress Report Voluntary Remediation Program, September 21, 2015
Voluntary Remediation Program-Revised Compliance Status Report, April 28, 2015
Former Vogue Cleaners, HSI # 10394
4018 Washington Road, Martinez, Columbia County

Dear Mr. McFarland:

The Georgia Environmental Protection Division (EPD) has completed its review of the revised Voluntary Remediation Program (VRP) Compliance Status Report (CSR) dated April 28, 2015; Summary of Additional Voluntary Corrective Action Activity Report dated September 21, 2015; and the Semi-Annual Progress Report dated September 21, 2015. EPD has also reviewed the September 2015 Fourth Semi-Annual VIRP Progress Report for the Columbia County Car Care Center (5C) submitted on behalf of Dr. Singh. In April 2015 5C conducted a soil excavation and removal action from their property and you have been copied on EPD's response to their report. Our comments on Vogue's revised CSR, progress report and Voluntary Corrective Action Activity report are provided below:

1. EPD concurs that tetrachloroethylene (PCE) concentrations in monitoring well MW-8R have decreased from the March 2015 sampling results (8,700 ug/L) to the June 2015 sampling results (6,500 ug/L) likely due to the enhanced fluid recovery (EFR) treatment. EPD is hopeful that the soil removal conducted at the Columbia County Car Care Center's property, coupled with the EFR treatment at MW-8R, would influence the reduction of PCE concentrations in MW-5.
2. EPD will require that a minimum of two rounds of groundwater sampling be conducted after attaining the targeted risk reduction standards (RRS) in order to certify that RRS have been met at the property. Since the next sampling event is scheduled in December, that event can be considered as the first round. Monitoring wells MW-8R, MW-2R and MW-5 should be included in both sampling events. The new sampling results should be used to update the model calibration and confirm model prediction. EPD concurs that sampling at POD-1 is no longer required based on laboratory results which indicate, that for the last four years, the volatile organic compounds (VOCs) have been below the detection limit.
3. EPD recommends that no monitoring wells be abandoned until the final two rounds of groundwater sampling have been completed and their data used to calibrate and update the fate and transport model.
4. Vogue has proposed, in Section 7 of the revised CSR, some of the conditions that would be included in the Uniform Environmental Covenant (UEC). An additional provision should be included that adds the requirement that any new building construction or modifications to existing building structures that result in the potential for vapor intrusion will include mitigation measures.

5. EPD recommends that Vogue submit a draft of the UEC for review and comments prior to or with the certified CSR for EPD's evaluation and comments.

Vapor Intrusion Comments

6. EPD was able to replicate Vogue's figures in Appendix C using the vapor intrusion screening level calculator using parameters: temperature of 25°C; a commercial scenario; a value of 10^{-5} target risk for carcinogens and target hazard quotient for non-carcinogens value of 1. EPD concurs with Vogue's conclusion that vapor intrusion does not pose a risk into the existing building, based on the sampling data used in the calculations.

AXA Equitable Life Insurance Company must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by AXA. However, failure of EPD to respond to a submittal within any timeframe does not relieve AXA from complying with the provisions, purposes, standards, and policies of the Act.

Please submit a CSR, certifying to the appropriate RRS for both soil and groundwater, which also addresses the above comments, by February 5, 2016. If you have any questions, please contact Mr. Montague McPherson at (404) 657-0483.

Sincerely,



Robin Futch
Acting Unit Coordinator
Response and Remediation Program

C: Dr. Harindorjit Singh
Scott Klosinski, Hull Barret PC
Mark Mitchell, Genesis Project, Inc.

File: HSI 10394

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