



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

March 1, 2017

Via U.S. Mail

And Email: dmeadows@hullbarrett.com

BCRE Investments, LLC
Mr. Tommy Blanchard, Manager
c/o Darren Meadows, Hull Barrett, PC
801 Broad Street, 7th Floor
Augusta, GA 30901

Subject: 1. Voluntary Remediation Program Application dated December 2015
2. May 11, 2016 VRP Application Update
3. November 28, 2016 VRP Application Addendum
Silverstein's Cleaners (HSI 10517)
2716 Washington Road, Augusta, Richmond County

Dear Mr. Blanchard:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program Application dated December 2015 and the referenced supporting documents, which are collectively considered as the Application submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. §12-8-100, et seq. EPD acknowledges this Application was submitted in lieu of continuing remediation as detailed in the approved Corrective Action Plan (CAP) Addendum #6 dated April 22, 2014, which was required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced site. EPD is approving your Application, which proposes corrective action consisting of the following:

- Source remediation in two areas, one being the primary area of concern (AOC) near the location of the former Silverstein's Dry Cleaner facility and associated septic drain field and one located near monitoring well MW-27, using a soil blending delivery method for in-situ chemical oxidation (ISCO) remedial efforts. As the use of ISCO was being conducted in accordance with a previously approved Corrective Action Plan (CAP), AECS proceeded with the proposed blending actions in June 2016.
- An evaluation, including groundwater contaminant fate and transport modeling, to determine potential risk to human receptors via the groundwater exposure pathway and potential vapor intrusion pathway.
- Reinstallation of several monitoring wells destroyed/abandoned during construction and/or soil remediation activities.
- Semi-annual groundwater sampling and analysis for regulated volatile organic compounds (VOCs) released at the site.

- ISCO via injection as necessary to bring groundwater into compliance based on risk assessment and groundwater monitoring results.
- Engineering and/or institutional controls to be proposed as necessary to prevent unacceptable exposure to potential receptors due to the presence of contaminated groundwater, including the vapor intrusion pathway.

Therefore, EPD is accepting BCRE Investments, LLC (BCRE Investments) as a participant as defined in the Act for the following qualifying properties provided BCRE Investments implements the Voluntary Investigation and Remediation Plan (VIRP) contained in the Application in compliance with the Act, the schedule, and the EPD comment letter dated March 1, 2017.

Qualifying Properties:

2716 Washington Road
Augusta, Richmond County, Georgia
Tax Parcel ID: 013-0-025-01-0

319 Heath Drive
Augusta, Richmond County, Georgia
Tax Parcel ID: 019-0-004-00-0

313 Berkman Road
Augusta, Richmond County, Georgia
Tax Parcel ID: 019-0-024-00-0

2702 Washington Road
Augusta, Richmond County, Georgia
Tax Parcel ID: 013-0-026-00-0

Within six (6) months of detecting regulated substance(s) on a non-qualifying property, the participant must apply to EPD to include the affected property as a qualifying property under the Act or notify EPD that the non-qualifying property is not included under the Act.

Since BCRE Investments is performing corrective action at the qualifying properties in accordance with an approved Application, the qualifying properties will be classified as a Class V site and designated as needing corrective action as provided for in §12-8-107(b) of the Act. Within 45 days of this letter, you are required to file an affidavit, if not previously filed, stating that your property has been listed on the state's hazardous site inventory and has been designated as needing corrective action due to the presence of hazardous wastes, hazardous constituents, or hazardous substances regulated under state law. This affidavit is to be filed with the clerk of the Superior Court of Richmond County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20. BCRE Investments must also place the notice, as required by subparagraph 391-3-19-.08(1)(a) of the Rules, in any warranty deed, mortgage, security deed, lease, rental agreement, or other instrument that is thereafter given or caused to be given by the property owner which creates an interest in or grants a use of the property.

Within 30 days of recording the affidavit or revised affidavit, please send a copy of the receipt of the recorded affidavit to the Response and Remediation Program, Georgia Environmental Protection Division, 2 Martin Luther King Jr. Drive, SE, Suite 1054 East, Atlanta, GA 30334.

EPD requires that BCRE Investments and the professional engineer/geologist specified in the Application oversee the implementation of the Voluntary Remediation Plan in accordance with the provisions, purposes, standards, and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by BCRE Investments. However, failure of EPD to respond to a submittal within any timeframe does not relieve BCRE Investments from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should BCRE Investments fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying properties from the voluntary remediation program.

EPD anticipates receipt of the first semi-annual progress report by September 1, 2017 and a Compliance Status Report (CSR), including certification of compliance with applicable Risk Reduction Standards, on or before March 1, 2022. Should you have any questions or concerns regarding this site, please contact Carolyn L. Daniels, P.G. of the Response and Remediation Program at (404) 657-8646.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: Rodger Daniel, AECS (via email: rcd@amenv.com)
Carrie Williams Welty, AECS (via email: clwilli@gmail.com)

File: 260-0151 (VRP)