

**Georgia Department of Natural Resources**  
**Environmental Protection Division**

2 Martin Luther King, Jr. Dr., Suite 1154, Atlanta, Georgia 30334  
Judson H. Turner, Director  
Land Protection Branch  
Keith M. Bentley, Branch Chief  
Phone: 404/656-7802 FAX: 404/651-9425

**Reply To:**

Response and Remediation Program  
2 Martin Luther King, Jr. Drive, S.E.  
Suite 1462, East Tower  
Atlanta, Georgia 30334-9000  
Office 404-657-8600 Fax 404-657-0807

**FILE COPY**

February 1, 2013

Ms. Hollie W. Lloyd  
Group Vice President  
Thomasville National Bank  
301 N. Broad Street  
Thomasville, Georgia 31792

Re: Voluntary Investigation and Remediation Plan and Application dated December 28, 2012  
Former Rose City Cleaners, HSI Site No. 10902  
Thomasville, Thomas County, Georgia 31792  
Tax Parcel ID: 005 006004

Dear Ms. Lloyd:

The Georgia Environmental Protection Division (EPD) has reviewed the December 2012 Voluntary Investigation and Remediation Plan (VIRP) Application submitted by Peachtree Environmental, pursuant to the Georgia Voluntary Remediation Program Act (the Act), which has been submitted in lieu of a compliance status report (CSR) required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced property. EPD is approving your voluntary remediation plan, which specifies additional site assessment and corrective action consisting of the following:

- Soil in the source area, locations of former dry cleaning machines will be sampled to evaluate if the soil pathway is complete;
- Selection of Monitored Natural Attenuation (MNA) as remedy for contaminated groundwater at the site;
- Vapor intrusion modeling of volatile organic compound (VOC) impacted groundwater and to evaluate if the vapor intrusion pathway is complete and poses an unacceptable risk for human exposure;
- Groundwater delineation to Type 1 Risk Reduction Standards; and
- Monitoring and modeling exposure pathways and groundwater to demonstrate compliance;

Therefore, EPD is accepting property owner Thomasville National Bank as a participant as defined in the Voluntary Remediation Program Act for the following qualifying property provided Thomasville National Bank implements the VRP in compliance with the following schedule and conditions:

**Qualifying property:**

301 N. Broad Street  
Thomasville, Thomas County, Georgia  
Tax Parcel ID: 005 006004

Within six 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 the non-qualifying property is not included under the Act.

**Schedule:**

- Semiannual progress reports are to be submitted to EPD. Each progress report must describe all actions taken since the last submittal, and include certification by the professional engineer/geologist specified in the VRP along with a monthly summary of hours invoiced and description of services provided since the last submittal.
  - Every August 1st and February 1st through February 1, 2018.

In addition to the information required above, the following must be included in the specific progress reports discussed below.

- February 1, 2014 semiannual progress report must demonstrate horizontal delineation on the qualifying property;
  - February 1, 2015 semiannual progress report must demonstrate complete horizontal delineation; and
  - August 1, 2015 semiannual progress report must demonstrate complete horizontal and vertical delineation, finalize the remediation plan and provide a cost estimate for implementation of remediation and associated continuing actions. EPD recommends that the participant finalize approval of cleanup standards for all regulated substances prior to this submittal.
- Compliance status report (CSR) including certifications:
    - February 1, 2018

**Conditions:**

1. EPD requires the submittal of a cost estimate for full implementation of the VRP through CSR submittal and a financial assurance instrument in that amount by no later than April 1, 2013. Model financial assurance instruments can be located at <http://www.qaepd.org/Files/PDF/forms/hwb/HSIModel.pdf>.
2. Within ninety (90) days of Thomasville National Bank's notice to withdraw from the Voluntary Remediation Program or termination by the Director pursuant to §12-8-107(d) of the Act, Thomasville National Bank must submit a compliance status report that complies with requirements of the Hazardous Site Response Act and associated Rules for Hazardous Site Response.
3. Thomasville National Bank must pay all outstanding fees within sixty (60) days of receipt of an invoice for any costs to the division in reviewing the application or subsequent document that exceed the initial application fee.

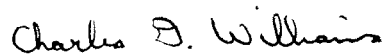
EPD requires that Thomasville National Bank and the professional engineer/geologist specified in the VRP oversee the implementation of the VRP in accordance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by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

Pursuant to §12-8-107(b) of the Act, EPD will notify the owner of the qualifying property the property has been designated as needing corrective action, and request them to file the required deed affidavit. If the affidavit is not filed, EPD may terminate enrollment of the qualifying property from the voluntary remediation program.

EPD's approval of the VRP extends only to those technical aspects of the document that expressly require EPD approval under applicable rules and statutes. This approval is not an endorsement by EPD that it accepts as conclusive any representations made in the document. Nor does EPD guarantee or warrant that the document is free of errors or omissions. EPD may later withdraw approval of this document, in whole or in part, if EPD determines that withdrawal is necessary to ensure compliance with the applicable rules and statutes.

If you have any questions, please contact Mr. Yue Han of the Response and Remediation Program at (404) 657-8678.

Sincerely,



Derrick Williams  
Program Manager  
Response and Remediation Program

c: Jason P. Chappell, Peachtree Environmental

File: 10902

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