

Georgia Department of Natural Resources

Environmental Protection Division

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Judson H. Turner, Director

Land Protection Branch

Phone: 404/657-8600 FAX: 404/657-0807

March 6, 2014

Louis Silverstein
EDSPEN, LLC
2568 Central Avenue
Augusta, Georgia 30904

COPY

VIA EMAIL AND REGULAR MAIL

Re: Conditional Approval of Entry Into Voluntary Remediation Program
Silverstein's Cleaners, HSI Site No. 10875
3818 Washington Road, Martinez, Georgia; Columbia County
Tax Parcel ID No. 078D046B

Dear Mr. Silverstein:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) Addendum, received by EPD on January 13, 2014, and submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100, et seq., as an application for the site's entry into the Voluntary Remediation Program (VRP). EPD also reviewed the October 18, 2013, Response to EPD Comments, which was prepared in response to EPD's June 5, 2013, Notice of Incomplete VRP Application. Your VIRP is conditionally approved. EDSPEN, LLC, is a participant, as defined in the Act, for the following qualifying property:

Silverstein's Cleaners
Martinez, Georgia; Columbia County
Tax Parcel ID No. 078D046B

The approved VIRP specifies corrective action consisting of the following:

- Treatment of contaminated soil in and around three source zones via excavation with off-site disposal, and a soil-vapor extraction (SVE) system, if needed.
- Treatment of contaminated groundwater by implementing one or more enhanced vacuum recovery (EFR) events at MW-9, followed by implementation of in-situ chemical oxidation (ISCO). Supplemental remedial options will also be evaluated.

Impacted properties downgradient of the Silverstein's Cleaners site should be identified and brought into the VRP as additional qualifying properties. The relatively high groundwater-contaminant concentrations at the site boundaries suggest that the dissolved contaminant plume has migrated off site. If residential risk reduction standards (RRSs) are not met for groundwater underlying those properties, environmental covenants restricting groundwater usage will be required. Each owner of an impacted off-site property will be required to sign a covenant before Silverstein's Cleaners can be removed from the VRP.

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 VIRP along with a monthly summary of hours invoiced and description of services provided since the last submittal.

- The reporting schedule will be March 6 and September 6 annually, beginning in 2014 and ending in 2019, unless a compliance status report (CSR) is submitted and approved prior to 2019.
- A CSR including certifications should be submitted by March 6, 2019.

In addition to the reporting schedule specified above, the following must be included in the September 6, 2016, progress report:

- Demonstration of 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, if applicable, for all regulated substances prior to this submittal.

Conditions of VIRP Approval

1. EDSPEN, LLC must evaluate the vapor-intrusion pathway for all buildings overlying the dissolved contaminant plume. An EPA-approved or otherwise peer-reviewed vapor-intrusion model, such as Johnson & Ettinger or VISL, should be used.
2. In accordance with provisions of the Act, a point of demonstration (POD) must be specified once the downgradient extent of the dissolved contaminant plume has been delineated. No POD was specified in the VIRP. Because groundwater-flow on site is multi-directional, at least two PODs will be required, and possibly three.
3. Please provide a map specifying the tax-identification numbers and property owners for all properties impacted or possibly impacted by contamination from the site.

The VRP Act requires that EDSPEN, LLC, and the professional engineer/geologist specified in the VIRP oversee the implementation of the VIRP 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 EDSPEN, LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve EDSPEN, LLC from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should EDSPEN, LLC fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program.

If you have any questions, please contact Allan Nix at (404) 657-3935.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

File: HSI No. 10875

c: Jason Chappell, Peachtree Environmental (via email)

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