

# Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334

## **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

Mark Williams, Commissioner  
Environmental Protection Division  
F. Allen Barnes, Director  
Land Protection Branch  
Mark Smith, Branch Chief

November 10, 2011

## **VIA E-MAIL AND REGULAR MAIL**

PM, Ltd.  
c/o Ms. Nancy Shannon  
Suntrust Bank  
25 Park Place, 2<sup>nd</sup> Floor  
Atlanta, Georgia 30003

Re: Voluntary Remediation Plan Application, October 14, 2010 and  
Additional Information submitted June 15, 2011  
Former Imperial Cleaners – Kingscreek Shopping Center, HSI Site No. 10690  
1233B Alpharetta Highway  
Roswell, Fulton County, Georgia  
Tax Parcels 12-1993-0450-063-5 and 12-1993-0450-062-7

Dear Ms. Shannon:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Plan (VRP) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) for the above referenced property. EPD is approving your VRP, which specifies corrective action consisting of the following:

- Execution of a Uniform Environmental Covenant to restrict exposure to contaminated groundwater;
- Surface water and groundwater monitoring;
- Continued fate and transport modeling of VOC-impacted groundwater, with a point of demonstration, to show no human or environmental receptors will be impacted by this release.
- Evaluation/mitigation of risk from indoor air vapor intrusion.

Therefore, EPD is accepting PM, Ltd., as a participant as defined in the Voluntary Remediation Program Act for the following qualifying property, provided PM, Ltd., implements the VRP in accordance with the following schedule and conditions:

Qualifying property:

Former Imperial Cleaners  
1233B Alpharetta Highway  
Roswell, Fulton County, Georgia  
Tax Parcels 12-1993-0450-063-5 and 12-1993-0450-062-7

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 May 10th and November 10th through November 10, 2016.

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

- May 10, 2014 semiannual progress report must 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 substance prior to this submittal.
- Compliance status report including certifications:
  - November 10, 2016

Conditions:

1. A copy of the proposed Uniform Environmental Covenant to be used in preventing human consumption of groundwater must be submitted by May 10, 2012. A model covenant may be found at:  
[http://www.gaepd.org/Files\\_DOC/forms/hwb/modelcovenant.doc](http://www.gaepd.org/Files_DOC/forms/hwb/modelcovenant.doc)
2. Please submit a financial assurance instrument for the estimated cost of implementing the remediation plan and associated continuing actions by no later than February 10, 2012. Model financial assurance instruments can be found at  
[http://www.gaepd.org/Files\\_PDF/forms/hwb/HSIModel.pdf](http://www.gaepd.org/Files_PDF/forms/hwb/HSIModel.pdf).
3. PM, Ltd. must address EPD's comments dated November 10, 2011 and any other notice of deficiencies, addressing the investigation and remediation pursuant to the Act to the satisfaction of the Director that it is consistent with the provisions, purposes, standards and policies of the Act.
4. Within ninety (90) days of PM, Ltd.'s notice to withdraw from the Voluntary Remediation Program or termination by the Director pursuant to §12-8-107(d) of the Act, PM, Ltd. must submit a corrective action plan that proposes actions to bring the site into compliance with the risk reduction standards of Section 391-3-19-.07 of the Rules for Hazardous Site Response.
5. PM, Ltd. 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 exceeds the initial application fee.

EPD requires that PM, Ltd. 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 PM, Ltd. However, failure of EPD to respond to a submittal within any timeframe does not relieve PM, Ltd. from complying with the specified schedule and the provisions,

purposes, standards and policies of the Act. Should PM, Ltd. fail to comply with the above schedule, EPD may terminate enrollment of the participant and 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. Terry Allison at (404) 657-8600.

Sincerely,

A handwritten signature in black ink that reads "Mark Smith". The signature is written in a cursive style with a large, stylized "M" and "S".

Mark Smith, Chief  
Land Protection Branch

File: HSI # 10690