

# Georgia Department of Natural Resources

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Mark Williams, Commissioner  
Environmental Protection Division  
Judson H. Turner, Director  
Land Protection Branch  
Mark Smith, Branch Chief  
404-657-8600

March 6, 2012

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

Indian Trail Association, LTD  
c/o Mr. Craig Harper  
P.O. Box 767127  
Roswell, Georgia 30076

Re: Voluntary Investigation and Remediation Plan Application, September 2, 2011  
Professional Cleaners & Linen Service  
2040 Beaver Ruin Road  
Norcross, Gwinnett County, Georgia  
Tax Parcel ID 6212 036

Dear Mr. Harper:

The Georgia Environmental Protection Division (EPD) has reviewed the September 2, 2011 Voluntary Investigation and Remediation Plan Application (VIRP) submitted by EMA pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. EPD acknowledges this VIRP application was submitted in lieu of listing the referenced site on the Hazardous Site Inventory (HSI) pursuant to the Georgia Rules for Hazardous Site Response (the Rules). EPD is approving your VIRP, which specifies additional site assessment and proposes possible corrective actions consisting of the following:

- Installing a well in the source area adjacent to the former location of the dry cleaner inside the building;
- Installing a well for vertical delineation downgradient of the source area;
- Execution of a Uniform Environmental Covenant to restrict exposure to contaminated groundwater;
- In situ chemical oxidation (ISCO);
- Groundwater monitoring;
- Fate and transport modeling of VOC impacted groundwater to illustrate no human or environmental receptors will be impacted by this release.

Therefore, EPD is accepting Indian Trail Association, LTD as a participant as defined in the Voluntary Remediation Program Act for the following qualifying property provided Indian Trail Association, LTD implements the VIRP in compliance with the following schedule and conditions:

### **Qualifying property:**

2040 Beaver Ruin Road  
Norcross, Gwinnett County, Georgia  
Tax Parcel ID: 6212 036

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 VIRP along with a monthly summary of hours invoiced and description of services provided since the last submittal.
- Every September 6<sup>th</sup> and March 6<sup>th</sup> through September 6, 2016.

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

- March 6, 2013 semiannual progress report must include the vapor intrusion, surface water, and groundwater pathway evaluation for the qualifying property;
- March 6, 2014 semiannual progress report must demonstrate complete horizontal delineation on all impacted properties; and,
- September 6, 2014 semiannual progress report must demonstrate complete vertical delineation, finalize the remediation plan and provide a final cost estimate for implementation of remediation and associated continuing actions. EPD recommends the participant finalize approval of cleanup standards for all regulated substances prior to this submittal.
- A compliance status report (CSR) including certifications must be submitted by March 6, 2017.

**Conditions:**

1. EPD requests the submittal of a financial assurance instrument for the amount of \$78,600.00 no later than May 7, 2012. Model financial assurance instruments can be located at <http://www.gaepd.org/Files/PDF/forms/hwb/HSIModel.pdf>.
2. Indian Trail Association, LTD must address EPD's March 6, 2012 comment letter addressing the remediation pursuant to the Act to the satisfaction of the Director that is consistent with the provisions, purposes, standards, and policies of the Act.
3. Within ninety (90) days of Indian Trail Association, LTD's notice to withdraw from the Voluntary Remediation Program or termination by the Director pursuant to §12-8-107(d) of the Act, Indian Trail Association, LTD will be listed on the Hazardous Site Inventory and will be subject to the requirements of the Hazardous Site Response Act and associated Rules for Hazardous Site Response.
4. Indian Trail Association, 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 exceed the initial application fee.

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EPD requires that Indian Trail Association, LTD 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 Indian Trail Association, LTD. However, failure of EPD to respond to a submittal within any timeframe does not relieve Indian Trail Association, LTD from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Indian Trail Association, 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 VIRP 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 Kristen Ritter Rivera, P.G. of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee  
Acting Program Manager  
Response and Remediation Program

c: Brent Cortelloni, EMA

File: VRP Application 1314972618 – Professional Cleaners & Linen Service

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