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Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King, Jr. Drive, SE, Suite 1054 East, Atlanta, Georgia 30334
(404) 657-8600; Fax (404) 657-0807
Judson H. Turner, Director

March 20, 2015

VIA E-MAIL AND REGULAR MAIL

Dr. Harinderjit Singh
Columbia Car Care Center
3685 Wheeler Road, Suite 201
Augusta, Georgia 30909

RE: First and Second Semi-Annual VIRP Progress Report
Columbia Car Care Center, HSI No. 10394
4014 Washington Road, Martinez, Columbia County, Georgia

Dear Dr. Singh:

The Georgia Environmental Protection Division (EPD) has reviewed the First and Second and Third Semi-Annual Voluntary Investigation and Remediation Plan (VIRP) Progress Reports dated May 30, 2014, August 29, 2014, and March 17, 2015 respectively. EPD's comments are provided below and should be addressed in accordance with the Voluntary Remediation Program Act.

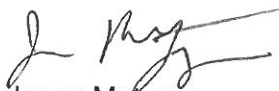
1. Please review the property line on the west of your property, bordering parcels 079 088 and 079 087, to verify accuracy of boundaries drawn in Figures. Information provided to EPD indicates that the location of MW-5 is located northwest on your property, Parcel 079 133. Please refer to recent reports related to Vogue Cleaners to observe the difference in property line and MW-5 locations.
2. Please label Figures appropriately. For example, Section 3, page 9 of the May 2014 report states that the groundwater elevation data is included in Figure 3. However, Figure 3 shows the soil sampling locations with the concentrations of tetrachloroethylene (PCE). Please also note on Figure 3 that the correct concentration for sample WESB-38 is 0.85 mg/Kg.
3. EPD concurs that soil and groundwater delineation are complete at the site in accordance with Items 5.b. and 5.c. of the VIRP checklist.
4. The Progress Reports indicated that contaminated soils would be excavated and removed and confirmation soil samples would be collected. Please provide a timetable for these activities in the next Progress Report.
5. The field sampling records provided did not include purge calculations and a summary of the well volumes removed. In general, all field sampling records should include a description of purging and sampling methods used, the specific method by which the final water samples were withdrawn from the wells (i.e. peristaltic pump/vacuum jug, downhole pump or bailer), purge rate, depth to water during the purge process, depth to the pump intake during purge process, and the intake depth of the sampling device. The sampling records should also state whether low flow/low stress or low flow/low volume purging techniques were employed during purging. Groundwater sampling for volatile organic compounds (VOCs) should be conducted using a low-flow peristaltic pump with Teflon® lined tubing following the procedure outlined in Section 7.3.3 of the SOP, commonly referred to as the "straw method." Please provide this additional information in subsequent reporting.
6. For some wells, the single well volume calculation that should have been used for the 3 volume purge and the amount actually purged are not equivalent. For example, for MW-11D in July 2014, the single well volume was 4.03 gallons, 3 volumes would have been 12 gallons but only 3 gallons were purged prior to sampling.

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7. Since there are only three shallow monitoring wells (MW-10, MW-15 and PMW-1) on the 5C Property, top-of-casing survey information should be acquired for MW-10 so that an accurate potentiometric map can be developed for shallow groundwater. Since entering the VRP in February 2013 this well has been listed as not surveyed.
8. Due to the site location and proximity to the Vogue Cleaners site, the Conceptual Site Model (CSM) figures, both plan view and cross sections A-A' and B-B' should be revised to run through existing monitoring wells and soil boring locations on-property and on the Vogue Cleaners property. Contaminant concentration data for soil borings and groundwater as well as groundwater elevations from the 5C property and the Vogue Cleaners property should be included on these revised cross sections. All current reports for the Vogue Cleaners property can be obtained at <http://epd.georgia.gov/voluntary-remediation>.

Please address the above concerns in your next VIRP Progress Report which should be submitted by August 18, 2015 in accordance with the VIRP Semi-Annual reporting schedule. If you have any questions, please contact Montague McPherson of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Jason Metzger
Unit Coordinator
Response and Remediation Program

c: Martin A. Shelton, Weissman Novack Curry & Wilco
Preston McFarland, AXA Equitable Life Insurance Co.

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