

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1066 East, Atlanta, Georgia 30334

Reply To:

Response and Remediation Program
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Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

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

November 15, 2010

FILE COPY

VIA EMAIL & REGULAR MAIL

Dickies Industrial Services, Inc.
c/o Joan B. Sasine
Bryan Cave Powell Goldstein
One Atlantic Center, Fourteenth Floor
1201 W. Peachtree St., NW
Atlanta, Georgia 30309

Re: Voluntary Remediation Plan and Application
Former Dickies Industrial Services, Inc. Property
HSI Site No. 10127
1411 Sullivan Road, College Park, Georgia 30337
Tax Parcels 13-0036-LL-134 and 13-0036-LL-135

Dear Ms. Sasine:

The Georgia Environmental Protection Division (EPD) has received the Voluntary Remediation Program (VRP) Application and Plan that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (Act) O.C.G.A. 12-8-100. After completing a review of the May 2010 VRP Application and Plan, EPD has noted the following deficiencies that may be addressed in subsequent progress reports and/or the compliance status report:

- 1) The Conceptual Site Model (CSM) must include all potential human health and ecological receptors, and the complete and incomplete exposure pathways that may exist at the site (Section 12-8-108 of the Act). Based on the data provided within the application, volatile organic compounds have been detected in the groundwater. Therefore, the vapor intrusion pathway must be evaluated as part of the CSR for onsite and offsite impacted residential and commercial properties.
- 2) If the cleanup standards for soil are based on site-specific Type 2, 4 or 5 RRS pursuant to the Act, then soil concentrations must be protective of groundwater at an established point of exposure for groundwater (i.e., property line) or at a hypothetical point of drinking water exposure located at a distance of 1000-feet downgradient from the delineated site contamination [Section 12-8-108(5)(c) of the Act], even if the groundwater pathway does not exceed a reportable quantity. Therefore, it must be demonstrated that the soil cleanup concentration will be protective of groundwater.
- 3) The southwest corner of the groundwater plume requires delineation in order to determine what properties are impacted. Please install an additional monitoring well that meets the delineation criteria established in the application in the southwest corner of the plume.

- 4) The narrative within the VRP application indicates that the chemicals of interest consist only of tetrachloroethene (PCE) and its degradation products in soil and groundwater. However, EPD's site summary lists many more VOCs detected at the site. All regulated substances currently detected in soil and/or groundwater at the qualifying property as well as associated breakdown products must be addressed as part of the Voluntary Investigation and Remediation Plan for the site. If all the other VOCs are already in compliance with applicable risk reduction standards, then this should be stated and certified in the Compliance Status Report for the site.
- 5) A recent groundwater monitoring event (with data less than 6 months old) is required from all monitoring wells on-site with analysis for all VOCs previously detected (see comment #4). Analysis of the recent groundwater data should also include a discussion regarding the stability of the plume and how that might affect potential surface water bodies and vapor intrusion issues (see comment #1).
- 6) Please provide the property owner names and contact information for all affected properties (including parcel ID#s) impacted by soil and/or groundwater contamination from the site.
- 7) In Table 3-1, the following locations exceed Type 3 RRS for PCE and should be highlighted in yellow (however, only the bolded location exceeds the Type 4 RRS):
 - HA-32 (5ft)
 - GP-2A (10ft)
 - **GP-2B (2ft)**
 - GP-5D (11ft)

Dickies Industrial Services, Inc. must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards, and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Dickies Industrial Services, Inc. However, failure of EPD to respond to a submittal within any timeframe does not relieve Dickies Industrial Services, Inc. from complying with the provisions, purposes, standards, and policies of the Act. EPD reserves all rights to require groundwater monitoring pursuant to Section 12-8-107(g)(2) of the Act.

Should you have any question or concerns regarding this matter, please contact Ms. Jacki Scarbary of the Response and Remediation Program at (404) 657-8600.

Sincerely,


Mark Smith, Chief
Land Protection Branch

c: Shanna Thompson, ERM
File: VRP Application – Dickies Industrial Services, Inc.