

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

July 10, 2011

COPY

KIC Management LLC
c/o Mr. Edwin Chang, Registered Agent
2270 Evergreen Lane
Lawrenceville, Georgia 30043

Re: Revised Voluntary Remediation Program Application dated June 15, 2011
Former Dry Cleaning Depot, HSI Site No. 10880
1073 Alpharetta Street, Roswell, Fulton County, Georgia
Tax Parcel ID No. 12-1902-0412-049-1

Dear Mr. Chang:


The Georgia Environmental Protection Division (EPD) has reviewed the June 15, 2011 revised voluntary remediation program application and plan submitted by your consultant, Mr. Peter T. Kallay of Environmental Services, for the above-referenced site. EPD has the following comments on the Conceptual Site Model (CSM):

The CSM must include all potential human health and ecological receptors, and the complete and incomplete exposure pathways that exist at the site (Section 12-8-108 of the Act). Based on the data provided within the application and the data available in the PCSR for Frazier Street Apartments & Minkert Residence, volatile organic compounds have been detected in groundwater samples collected inside Frazier Street Apartments & Minkert Residence property located southeast of the site across Frazier Street. Therefore, the vapor intrusion pathway from contaminated soil and groundwater must be evaluated as part of the CSR for onsite and offsite impacted residential and commercial properties.

KIC Management LLC 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 KIC Management LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve KIC Management from complying with the provisions, purposes, standards and policies of the ACT.

If you have any questions, please contact Mr. Yue Han of the Response and Remediation Program at 404-657-8600.

Sincerely,


Alexandra Y. Cleary
Program Manager
Response and Remediation Program

c:/ Peter T. Kallay, PE – Atlanta Environmental Consultants, LLC

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