

Georgia Department of Natural Resources

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Environmental Protection Division

Judson H. Turner, Director

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Reply To:

Response and Remediation Program

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April 10, 2014

VIA EMAIL AND REGULAR MAIL

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

MAILED
4-10-2014

Re: January 2014 Semiannual Status Report
Former Dry Cleaning Depot, HSI Site No. 10880
Roswell, Fulton County, Georgia
Tax Parcel ID: 12-1902-0412-049-1

Dear Mr. Chang:

The Georgia Environmental Protection Division (EPD) has reviewed Atlanta Environmental Consultant's January 2014 Semiannual Status Report for the above referenced site. EPD provides the following comments:

- 1) The adjacent single family residential property at 1065 Frazier Street, located to the east of the site, is not described in the report, nor has any vapor intrusion exposure pathway information been provided regarding this property. Based on the site visits, it was confirmed that this property contains a structure with a basement and will need to be incorporated into the vapor intrusion exposure pathway assessment.
- 2) The delineation of PCE in groundwater is not completed horizontally east of MW-5 and southeast of MW-4. Further vertical delineation may be needed at MW-8 as PCE detected above its type 1 risk reduction standard. EPD suggests that you get recent groundwater data in the adjacent Frazier Street Apartment to further determine the extent of PCE plume. Please submit a single Figure combining site and Frazier data to determine if delineation is complete.
- 3) While the data showed an overall trend of decreasing PCE concentrations in groundwater at the site, EPD requests that additional data be provided to validate the groundwater concentration trend. Please perform a statistical trend analysis to verify the assertion that there has been an overall decrease in contaminant concentrations. Please ensure that the trend analysis is based on concentration trends at wells most representative of the source area(s).

In addition, EPD requires that fate and transport modeling be conducted to predict worst-case conditions that could develop if natural attenuation and institutional controls are to be implemented, i.e. approximation of the maximum distance the plume may extend under the current scenario. The model should rely on field data where possible, and should also incorporate an estimate of the time it will take for groundwater to meet risk reduction standards under a natural attenuation scenario. Modeling should be performed using a model recognized and reviewed by USEPA or alternative model approved by EPD. An electronic copy of the model, including all input parameters and model outputs, must be submitted for review as a part of the required semi-annual progress report submittal.

4) The soil sample collected at MW-2 had a PCE concentration (0.449 mg/Kg) which is above its notification concentration (0.18 mg/Kg) and was very close to the type 1 RRS (0.5 mg/Kg) in the March 2008 sampling event. EPD requests that you collect another soil sample at MW-2 at 2-foot depth to demonstrate the soil is in compliance with Type 1 RRS.

5) The vapor intrusion pathway analysis and evaluation is incomplete regarding the onsite structure. However, EPD defers its comments until the receipt of the plans for sub-slab depressurization system (blower) that has been proposed as part of the corrective measures for the site.

6) If the site is relying on the assumption that groundwater will not be utilized in order to justify exposure assumptions and calculate cleanup standards, then controls are needed to guarantee that assumption. As such, the covenants restricting such use on the qualifying property(s) should be revised in conformance with O.C.G.A. 44-16-1, et seq., the 'Georgia Uniform Environmental Covenants [UEC] Act'. A model UEC can be found at: http://www.gaepd.org/Files_DOC/forms/hwb/modelcovenant.doc.

7) A description of the procedures used to acquire the analytical and technical data used as part of VRP Progress Report updates must be provided, or provide a proper reference to a report from which the data was pulled from. Consequently, the information provided in the application is not sufficient to allow EPD to make a determination that the groundwater and soil samples were collected in accordance with US-EPA Region 4 SESD "Field Branches Quality System and Technical Procedures (SESDPROC-301-R1)."

If you have any questions regarding this matter, please contact Mr. Yue Han of the Response and Remediation Program at (404) 657-8678.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Peter T. Kallay, AEC, LLC

File: 10880

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