



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

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June 30, 2017

PM, Ltd.
c/o Joan B. Sasine, Esq.
Bryan Cave
One Atlantic Center, Fourteenth Floor
1201 W. Peachtree St., NW
Atlanta, GA 300309-3488

Subject: VRP Compliance Status Report dated November 12, 2015
VRP Compliance Status Report dated July 27, 2016
Imperial Cleaners (Former), HSI #10690
1233B Alpharetta Highway, Roswell, Fulton County
Tax Parcels 12-1993-0450-063-05 and 12-1993-0450-062-7

Dear Ms. Sasine:

The Georgia Environmental Protection Division (EPD) has reviewed the subject compliance status reports (CSRs) prepared and submitted by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler) on behalf of PM, Ltd. These reports were submitted in accordance with the Voluntary Remediation Program (VRP) Act and the Rules for Hazardous Site Response. EPD has the following comments, which need to be addressed before EPD can concur with the certification of compliance with Risk Reduction Standards:

1. Groundwater contaminant concentration trend graphs were not provided as requested in Comment #2 of the October 14, 2014 EPD letter. Please provide these trend graphs. Dates of major remedial efforts, such as the excavation of impacted soil conducted by the Fulton County Board of Education (Board of Education), should be indicated on the trend graphs.
2. Well purging and sampling field records for the June 2015 groundwater sampling event have not been provided. Consequently, EPD is unable to evaluate purging and groundwater sampling procedures employed by field personnel or the validity of the groundwater analytical results for the groundwater sampling event. Please provide these field records. Comment #4.a.i. of the February 5, 2014 EPD letter has a list of information that should be provided.
3. Please revise Table 7 of the July 2016 CSR based on the most recent groundwater results from each monitoring well.
4. Please provide the following for EPD's evaluation of site compliance with Type 1 Risk Reduction Standards (RRS) for soil:
 - a. A narrative description of soil remedial actions (sampling and excavation) conducted by the Board of Education, including confirmation sampling activities, to bring the site into compliance with the Type 1 RRS.

- b. A revised Table 3 of the July 2016 CSR that includes the analytical results for soil samples collected by the Board of Education. Soil sample analytical results representing soil no longer in-situ should be clearly identified on the table.
- c. A revised Table 7 of the July 2016 CSR that has been updated to reflect current soil conditions at the VRP properties subsequent to the recent remedial actions for soil conducted by the Board of Education. For example, this table shows the highest soil concentration of 1.2 mg/kg for tetrachloroethene, which is greater than the Type 1 RRS of 0.5 mg/kg.
- d. A figure that depicts the locations for all soil samples collected, including those acquired by the Board of Education. Those sample locations representing soil no longer representative of current site conditions (i.e., representing excavated soil) should be clearly identified on the figure.
- e. A figure that summarizes soil analytical results that represent in-situ soil conditions. All soil sample locations should be depicted, but only the analytical results depicting current in-situ conditions should be tabulated/summarized on this figure. Please clearly identify any samples that were collected in the saturated zone, as they are not subject to compliance with soil RRS. Isoconcentration contour lines should depict the extent of contamination greater than delineation standards and RRS in the vadose zone.
- f. Updated cross-sections (Figures 6 and 7 of the July 2016 CSR) depicting current soil and the most recent groundwater conditions as follows:
 - i. Please clearly depict the extent of excavated areas and include soil analytical results representing in-situ soil conditions.
 - ii. Please clearly depict decommissioned or destroyed monitoring wells.
 - iii. Replace monitoring well MW-2 with monitoring wells MW-16 on Cross Section B-B' (Figure 7) to straighten out the line of cross-section.
 - iv. Please include stratigraphic information below the lines indicating auger refusal on both cross-sections as provided on the applicable boring logs in Appendix E of the July 2016 CSR.
 - v. Please depict soil types (e.g., silty sand, etc.) in addition to origin (e.g., fill, residual soil, and alluvium) as described on the applicable boring logs provided in Appendix E of the July 2016 CSR.

In addition, a plan view figure should be provides that depicts: 1) the lines of cross-section, 2) soil and groundwater sample locations, 3) surface features such as current or former buildings, etc., 4) the areal extent of the VRP properties, and 5) excavation areas.

5. Please clarify the current property boundaries and tax parcel information for the VRP properties. The original properties enrolled in the VRP were tax parcels 12-1993-0450-063-5 and 12-1993-0450-062-7. The 2016 CSR certification statement references these tax parcels along with "Parcel 1" and "Parcel 2." In Appendix A, Figures A.1 and A.2 show Parcel 1 (14.495 acres) and Parcel 2 (2.63 acres), which have different boundaries compared to the tax

parcels. In Appendix B, Figure 3 identifies a “VRP Property” of 3.935 acres which consists of all of Parcel 2 and a portion of Parcel 1. Property boundary and identification clarification is also needed for the Uniform Environmental Covenant. In our experience with property related to compliance certifications and Uniform Environmental Covenants, an individual property is typically associated with a single tax parcel number.

EPD understands that soil excavation was performed by the Board of Education as part of an effort to certify compliance with soil RRS and obtain a limitation of liability for preexisting releases under the Georgia Brownfield Act. In lieu of addressing the comments related to soil through a VRP submittal, compliance with soil RRS may be documented through the submittal of a prospective purchaser compliance status report by the Board of Education.

Please provide the requested information as an addendum to the CSR by October 15, 2017. If you have any questions, please contact Ms. Carolyn L. Daniels, P.G. at (404) 657-8646.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

- c: Charles Ferry, Amec Foster Wheeler (via email)
- Stephanie Horwitz, EPD Brownfield Unit (via email)
- Scott Hitch, Nelson Mullins (via email)
- Kevin McGowan, Contour Engineering (via email)

File: 261-0571 (VRP)