

Georgia Department of Natural Resources

Environmental Protection Division – Land Protection Branch

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(404) 657-8600; Fax: (404) 657-0807

Judson H. Turner, Director

February 16, 2016

City of Duluth
c/o Mr. James Riker
City Manager
City of Duluth
3167 Main Street
Duluth, GA 30096

Re: HSI Site Number: 10892
Former Duluth Dry Cleaners
Tax Parcel ID # 6293.402
Duluth, Gwinnett County

Dear Mr. Riker:

The Environmental Protection Division (EPD) has received the January 2016 Voluntary Remediation Program Application (the Application) for the Former Duluth Dry Cleaners] facility, in Duluth, Gwinnett County, pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. §12-8-100, *et seq.*, submitted by WENCK Associates, Inc. (WENCK) on behalf of the City of Duluth (The City). After completing its review of the application, and visiting the site on February 5, 2016, EPD has prepared the following comments:

1. The Application states that Corrective action is not planned for sub-surface soil because the property is intended to be maintained as an asphalt parking lot for the foreseeable future. The City intends to install environmental covenants so that the Site will remain capped with the asphalt parking lot and maintained. However, there is no mention of a maintenance and monitoring plan (MMP) to maximize the life and performance of the parking lot. A MMP will be required as part of the Type 5 Risk Reduction Standards (RRS) for the site.
2. Please revise the three dimensional conceptual site model to better reflect conditions at the site. The following is suggested:
 - a. Superimpose Transect A-A' and B-B' onto Figure No. 3,
 - b. Label Figure Nos. 8 and 9 with their figure numbers, and
 - c. Correct Transect B-B' to show the correct spatial order of the wells.
3. The Application currently contains a table of delineation standards, in Section 4, that does not match all of the contaminants listed in Tables 1 and 2 and in Appendix H. The table in Section 4 must include delineation standards for all contaminants detected at the site, or a discussion of why a contaminant is not related to the release at the site. In addition, it would be helpful to include a column for Type 1 RRS in Tables 1 and 2, even if the value is identical to the Type 3 RRS for some contaminants. Note that the soil Type 3 for tetrachloroethene and vinyl chloride should be 500 ug/kg and 200 ug/kg, respectively, in Table 1.

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The above listed comments must be addressed 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 The City. However, failure of EPD to respond to a submittal within any timeframe does not relieve The City from complying with the provisions, purposes, standards, and policies of the Act. Should you have any questions or concerns regarding this site, please contact Mr. Tom Brodell of the Response and Remediation Program at (404) 232-7891.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

cc: Katie Ross, WENCK Associates, Inc. (kross@wenck.com)

File: VRP – Former Duluth Dry Cleaners] # 10892

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