

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr. S.E., Suite 1462 East, Atlanta, Georgia 30334

Mark Williams, Commissioner
Environmental Protection Division
Judson H. Turner, Director
Land Protection Branch
Mark Smith, Branch Chief
404-657-8600

March 6, 2012

VIA E-MAIL AND REGULAR MAIL

Indian Trail Association, LTD
c/o Mr. Craig Harper
P.O. Box 767127
Roswell, Georgia 30076

Re: Voluntary Investigation and Remediation Plan Application, September 2, 2011
Professional Cleaners & Linen Service
2040 Beaver Ruin Road
Norcross, Gwinnett County, Georgia
Tax Parcel ID 6212 036

Dear Mr. Harper:

The Georgia Environmental Protection Division (EPD) has reviewed the September 2, 2011 Voluntary Investigation and Remediation Plan (VIRP) Application submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. EPD has the following comments:

Groundwater Delineation:

1. Laboratory analyses of a groundwater sample collected from monitoring well MW-1 resulted in concentrations of tetrachloroethene (PCE) of 50 µg/L. The delineation standard is 5 µg/L. Delineation must be completed in the area of MW-1.
2. Delineation must be completed southwest of MW-2, which resulted in 62 µg/L of PCE.

Risk Reduction Standard (RRS):

3. **Tables 1 & 2:** The notification concentrations for PCE and acetone are incorrectly listed as the soil Type 1 RRS. The Type 1 RRS for PCE is 0.5 mg/kg. The Type 1 RRS for acetone is 400 mg/kg.
4. **Table 4:** The Type 1 groundwater RRS for chloroform is incorrect. The correct value is 80 µg/L based on the revised Appendix III Table 1 value. Revise accordingly.
5. **Table 5:** As per the VRP Act, the Type 1 groundwater RRS for cis-1,2-dichloroethene may be used as the delineation standard (i.e. 70 µg/L).
6. EPA has recently updated the PCE toxicity values in the Integrated Risk Information System (IRIS). The changes went into effect on February 10, 2012. EPD recommends calculating a default Type 4 RRS for PCE. The updated values do not yet appear in the Regional Screening Levels tables (RSL) but are available from the IRIS website at http://cfpub.epa.gov/ncea/iris/index.cfm?fuseaction=iris.showQuickView&substance_nmbr=0106.

Vapor Intrusion Modeling:

7. The Target Risk (TR) for carcinogens should be 10^{-5} . Revise accordingly. Please note the Reference Concentration (RfC) for PCE is incorrect in the J&E model. EPD requests you use the most current version of the RSL table to obtain the correct RfC value, which can be found at <http://www.epa.gov/region9/superfund/prg/index.html> (last updated Nov. 2011).

As noted above, EPA updated the PCE toxicity values in IRIS on February 10, 2012. These changes will also affect the results of the J&E model. EPD requests you use the updated toxicity values when reevaluating the J&E model and the risk from vapor intrusion at the site.

8. For soil, an average of 5 post-confirmatory samples was used as the initial soil concentration in the J&E model instead of the highest post-confirmatory concentration. The model must be revised using the highest post-confirmatory PCE concentration of 71 $\mu\text{g}/\text{kg}$.
9. Please provide a table of inputs for the J&E model including references. The indoor exchange rate was set to 1 due to the presence of an exhaust fan. Please provide the rationale and/or calculation verifying that 1 is an acceptable exchange rate.

Human and Environmental Receptors:

10. EPD does not concur that all exposure pathways are currently incomplete at the qualifying property. Several exposure pathways on the qualifying property cannot currently be eliminated from consideration until: 1) groundwater contaminant delineation, 2) vapor intrusion modeling, 3) groundwater usage and surface water survey, and 4) groundwater fate and transport modeling have been completed.

Indian Trail Association, LTD 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 Indian Trail Association, LTD. However, failure of EPD to respond to a submittal within any timeframe does not relieve Indian Trail Association, LTD from complying with the provisions, purposes, standards and policies of the Act.

If you have any questions, please contact Kristen Ritter Rivera, P.G. of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee
Acting Program Manager
Response and Remediation Program

c: Brent Cortelloni, EMA

File: VRP Application 1314972618 – Professional Cleaners & Linen Service