



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

February 14, 2017

QuikTrip Corporation
c/o Ms. Kyla Rudd, Environmental Project Manager
4705 South 129th East Avenue
Tulsa, Oklahoma 74134

Subject: Semi-Annual Voluntary Remediation Program Progress Report (5), June 16, 2015
Semi-Annual Voluntary Remediation Program Progress Report (6), December 3,
2015, Semi-Annual Voluntary Remediation Program Progress Report (7), July
16, 2016, and Semi-Annual Voluntary Remediation Program Progress Report (8),
February 9, 2017
Response to Comments dated June 4, 2015
Professional Cleaners & Linen Service
2040 Beaver Ruin Road
Norcross, Gwinnett County, Georgia
Tax Parcel ID 6212 036

Dear Ms. Rudd:

The Georgia Environmental Protection Division (EPD) has reviewed the subject documents for the referenced site. These reports were submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. EPD has the following comments:

Response to Comments dated June 4, 2015

1. With the exception of Comments 2, 5, and 10, which are addressed in subsequent comments in this letter, EPD considers the responses given in the June 4, 2015 Response to Comments to be adequately addressed.

Comments for Semi-Annual VRP Progress Reports 5, 6, 7, and 8

2. EPD will consider a site-specific cleanup standard for PCE following additional groundwater monitoring and plume delineation. Fate and transport modeling as provided in §12-8-108(7) of the Act may also be used in support of a site-specific cleanup standard.
3. EPD requests that two groundwater monitoring wells be installed on the northern property boundary of 1996 Indian Trail Road at the location of the former Autosmith Used Car Facility. Once installed, the monitoring wells should be developed and sampled for PCE and its daughter products. EPD requested the installation of additional monitoring wells at 1996 Indian Trail Road in our April 23, 2015 Comments to Progress Reports 3 and 4. The sampling of these two wells will verify the presence of PCE, provide additional information on the area groundwater flow paths, and support plume delineation.

4. Additionally, EPD requests that a monitoring well be installed east of monitoring well MW-4 and southeast of monitoring well MW-11. The new well proposed in Progress Report 7 meets these criteria. Once installed, the monitoring well should be developed and sampled for PCE and its daughter products. The purpose of this well is to support plume delineation in this area.
5. Pursuant to Section 12-8-107(h) of the Act and as noted in Progress Report 8, execution of a Uniform Environmental Covenant (UEC) to restrict groundwater use is planned for the property. Additionally, the UEC should provide that the property use will remain non-residential.
6. On Table 2 of Progress Report 6, the sampling date for monitoring well MW-4 during the December 2015 sampling event is incorrectly listed as 6/8/2015. Please correct this error for future reports.
7. In Section 4.3 of Progress Report 8, EPD noted that the date for the VRP-CSR is incorrectly given as June 18, 2003. The correct date of the VRP-CSR should be June 18, 2013.
8. Please submit future documents to EPD following our document submittal guidelines, which can be found at:

http://epd.georgia.gov/sites/epd.georgia.gov/files/related_files/eDocumentFormat.docx

QuikTrip Corporation (QuikTrip) 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 QuikTrip. However, failure of EPD to respond to a submittal within any timeframe does not relieve QuikTrip from complying with the provisions, purposes, standards and policies of the Act.

Please submit the next semi-annual progress report to EPD by June 30, 2017. If you have any questions, please contact Susan Kibler at (404) 657-7126.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

- c: Craig Harper, Indian Trail Association, LTD (via email)
Brent Cortelloni, EMA (via email)
Mark Mitchell, Genesis Project, Inc. (via email)

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