



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

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

March 1, 2017

Via U.S. Mail

And Email: dmeadows@hullbarrett.com

BCRE Investments, LLC
Mr. Tommy Blanchard, Manager
c/o Darren Meadows, Hull Barrett, PC
801 Broad Street, 7th Floor
Augusta, GA 30901

Subject: EPD Comments Regarding:

1. Voluntary Remediation Program Application dated December 2015
 2. May 11, 2016 VRP Application Update
 3. November 28, 2016 VRP Application Addendum
- Silverstein's Cleaners (HSI 10517)
2716 Washington Road, Augusta, Richmond County

Dear Mr. Blanchard:

The Georgia Environmental Protection Division (EPD) has reviewed the referenced documents, which were submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) as an Application for entry into the Voluntary Remediation Program (VRP). That Application was approved in our letter dated March 1, 2017. However, EPD has the following comments on the referenced documents which may assist you in achieving specific investigation and cleanup milestones pursuant to the Act and program, including submittal of a final Compliance Status Report (CSR) by March 1, 2022.

1. **Site Description and Setting:** Please clearly identify the qualifying VRP Properties by either outlining or shading the properties in color on the 1 inch = 254 ft scaled tax plat in Appendix A of the Voluntary Investigation and Remediation Plan (VIRP) in the first VRP Semi-Annual Progress Report.
2. All regulated substances listed in Appendix I of the Rules for Hazardous Site Response (Rules) historically detected in soil or groundwater above background levels, or regulated degradation products of another detected regulated substance (even if not currently detected), are constituents of concern (COC) subject to delineation and cleanup requirements pursuant to the Act.
 - a. Please update the list of regulated substances in Section 4.0 of the VIRP for groundwater at the "site" to include total trihalomethanes [which are regulated in addition to the individual trihalomethanes historically detected at the site (chloroform and bromoform)], 2-butanone (MEK), and bromomethane.

- b. Section 2.2 of the originally submitted VIRP states site soil complies with Type 1 Risk Reduction Standards (RRS) and is not addressed further. Note that a signed certification of compliance for soil is needed since it has not previously been submitted to EPD. Figures and tables summarizing soil analytical results representing current site conditions should be included to support the certification. EPD recommends that the soil certification of compliance and supporting documentation be submitted as soon as possible, such as in an upcoming progress report.
3. Please update the cross-sections to include/depict:
 - a. Any soil boring or monitoring well advanced/installed at the site in response to the release at the identified source that lies within or immediately adjacent to the line of cross-section,
 - b. Potential or known source areas (e.g., dry cleaning machine location, former product and hazardous waste storage areas, septic drain fields, etc.),
 - c. Actual and/or hypothetical Points of Exposure (POEs) such as water supply wells, surface water bodies, buildings, utilities, etc.,
 - d. Source and point of demonstration (POD) well location(s) to be used as comparison points in future groundwater contaminant fate and transport modeling efforts,
 - e. The locations and dimensions (laterally and vertically) of areas that were the focus of soil and groundwater remedial efforts to date (e.g., excavations, ISCO injection areas, soil blending areas, etc.). Material used as backfill in excavations should be identified and depicted (e.g., gravel, sand, etc.),
 - f. The most recent groundwater analytical results adjacent to the well screened interval of the wells sampled. Isoconcentration contours (isopleths) should depict the lateral and vertical extent of each contaminant detected above its delineation standard and those contaminants exceeding initial applicable cleanup standards (Type 1/2 or Type 3/4 RRS) in groundwater.
4. Potential Receptors/Exposure Pathways/Exposure Domains:
 - a. Please identify and label the nearest downgradient surface water bodies on Figure 8 of the VIRP in the next submittal.
 - b. EPD understands that a surface water drainage feature was formerly located on one or more of the VRP participating Properties that had been impacted by the release in the past and has since been buried/culverted. Please superimpose the location of the former feature as it is considered a potential contaminant migration pathway for nearby surface water bodies that could be points of exposure for human and ecological receptors until sufficient justification has been provided to eliminate said feature as a potential exposure pathway.
 - c. All buildings located above or within the estimated maximum footprint of the groundwater contaminant plume or within approximately 100 feet of those footprints should be evaluated for the vapor intrusion pathway.

5. Delineation Criteria and Standards (Section 4.0 of the December 2015 VIRP):

a. Groundwater:

- i. Based on recent groundwater analytical results and the location of Washington Road, EPD will not require further delineation along the northern (upgradient) edge of the plume as recommended in Section 3.2.2 of the VIRP. However, standard delineation criteria (i.e., Type 1 RRS) should apply to the remainder of the plume.
- ii. The table embedded on page 10 of the December 2015 VIRP, should be revised to include proposed delineation standards for: 1) total trihalomethanes (the summation of detected chloroform and bromoform concentrations), 2) 2-butanone (MEK), and 3) bromomethane; which are regulated substances historically detected in groundwater at the site.

References (narratives, tables, figures, etc.) to groundwater delineation criteria/standards and conclusions regarding the extent of groundwater contamination in future submittals should be adjusted based on this comment.

- b. Surface Water and Sediment: Should surface water bodies be confirmed as potential POEs for human or ecological receptors, delineation and cleanup standards should be proposed, along with the criteria used to determine them, for EPD review and concurrence.

6. Any regulated substance detected above its delineation standard, must also have a cleanup standard to which analytical results are compared. Therefore, a cleanup standard must be proposed for bromomethane. Please update the embedded table in Section 5.7.2 of the VIRP accordingly.

7. Investigative and Corrective Actions Conducted To Date:

- a. A description of the slurry wall, shown near the southwestern end of the contaminant plume on Figures 3, 4, and 7 C of the originally submitted VIRP, should be included in summaries of groundwater corrective actions completed to date in future submittals as it remains in place at the site.
- b. Please include a brief description of the soil blending activities conducted at the site in June 2016 in the first Semi-Annual VRP Progress Report.
- c. It is EPD's understanding that the monitoring wells on the former Frohman Property (the fourth qualifying tax parcel) were sampled and decommissioned with EPD's verbal concurrence. Please summarize the associated groundwater analytical results associated with the referenced sampling event in the first VRP Semi-Annual Progress Report.
- d. EPD will defer decisions regarding groundwater compliance beneath the former Frohman property at 2702 Washington Road (fourth qualifying Property) pending EPD's receipt of additional groundwater monitoring results acquired since submittal of the VIRP.

8. Proposed Additional Investigative and Corrective Actions:

- a. EPD cannot concur that the extent of groundwater contamination has been achieved west of MW-27 at this time and will defer further evaluation until a minimum of two groundwater monitoring events have been conducted using the monitoring well network referred to in Part c of this comment.
 - b. Please include an evaluation of groundwater conditions using the screening protocol recommended in the *Technical Protocol for Evaluating Natural Attenuation of Chlorinated Solvents in Ground Water* (EPA/600/R-98/128, September 1998).
 - c. Your consultant provided EPD with a table and site map, via email, proposing a revised performance monitoring network for groundwater contamination on January 10, 2017. EPD responded to said submittal in a letter dated January 11, 2017 and EPD understands that associated monitoring well installation occurred in February 2017.
 - d. In accordance with §12-8-107(h) of the Act, any voluntary remediation property relying on controls, including but not limited to groundwater use restrictions for the purposes of certifying compliance with cleanup standards, shall execute a Uniform Environmental Covenant (UEC) restricting such use.
9. Please provide copies of field sampling logs for the groundwater sampling event conducted in September 2015 and ensure that field sampling records are provided for each future monitoring event in the submittal that documents their results.
10. Please include the appropriate delineation standards for each historically detected regulated substance released on tables and figures summarizing groundwater analytical results in addition to the proposed cleanup standards (Type 3/4 RRS), shown on Tables 1a and 1b, in future submittals.
11. Please request that the testing laboratory report the lowest reliable analytical detection limits for bromomethane and chloromethane in groundwater. Historically, detection limits reported for these substances on Tables 1a and 1b of the VIRP have been significantly greater than their Type 1 RRS.

The above 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 BCRE Investments, LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve BCRE Investments, LLC from complying with the provisions, purposes, standards, and policies of the Act.

VRP Application Comments
BCRE Investments, LLC
March 1, 2017
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If you have any questions, please contact Carolyn L. Daniels, P.G. of the Response and Remediation Program at (404) 657-8646.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: Rodger Daniel, AECS (via email: rdc@amenv.com)
Carrie Williams Welty, AECS (via email: clwilli@gmail.com)

File: 260-0151 (VRP)

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