



**Richard E. Dunn, Director**

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

May 28, 2019

**Via U.S. Mail**  
**And Email: [scott.siebert@kroger.com](mailto:scott.siebert@kroger.com)**

The Kroger Company  
c/o Scott Siebert, Assistant Construction Manager  
2175 Parklake Drive NE  
Atlanta, Georgia 30345

Subject: Voluntary Investigation and Remediation Plan dated August 21, 2018  
Lucky Cleaners (Former), HSI #10845  
2801 Washington Road, Augusta, Richmond County, Georgia

Dear Mr. Siebert:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated August 21, 2018 that was submitted by The Kroger Company (Kroger) as an application for enrollment in the Voluntary Remediation Program (VRP) for the referenced property. The VIRP was submitted by Contour Engineering of Kennesaw, Georgia on behalf of Kroger. EPD has the following comments:

1. In addition to the 2801 Washington Road property, the VRP application form lists 2805 and 2807 Washington Road as additional qualifying properties. However, no sampling data (e.g., soil, groundwater, etc.) is presented in the VIRP for these properties. Please clarify if there is data available for these properties regarding the presence of regulated substances.
2. Proposed vertical delineation with the installation and subsequent sampling of the proposed deep monitoring well (MW) noted in Section 4.3.1 and as shown on Figure 11 of the VIRP is acceptable to EPD.
3. The proposed abandonment of MW-9 which has historically been dry is acceptable to EPD.
4. Please show the locations of potential groundwater receptors (e.g., nearby surface water bodies, drinking water wells, etc.) on a map.

The above comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards, and policies of the VRP Act. EPD may, at its sole discretion, review and comment on documents submitted by Kroger. However, failure of EPD to respond to a submittal within any timeframe does not relieve Kroger from complying with the provisions, purposes, standards, and policies of the VRP Act.

VRP Application Comments  
The Kroger Company  
May 28, 2019  
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Please address the comments listed above in the first VRP semiannual progress report, or as otherwise appropriate, which should be submitted to EPD by November 28, 2019. If you have any questions, please contact Gordon Terhune of the Response and Remediation Program at 404-657-0492.

Sincerely,



Jason Metzger  
Program Manager  
Response and Remediation Program

c: Greg Rowell (via email: [growell@contoueng.com](mailto:growell@contoueng.com))

File: 260-0164 (VRP)

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