

Georgia Department of Natural Resources

Environmental Protection Division

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Judson H. Turner, Director

Land Protection Branch

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Reply To:

Response and Remediation Program
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FILE COPY

February 1, 2013

CERTIFIED MAIL **RETURN RECEIPT REQUESTED**

Ms. Hollie W. Lloyd
Group Vice President
Thomasville National Bank
301 N. Broad Street
Thomasville, Georgia 31792

Re: Voluntary Investigation and Remediation Plan and Application dated December 28, 2012
Former Rose City Cleaners Site, HSI # 10902
301 N. Broad Street
Thomasville, Thomas County, Georgia 31792

Dear Ms. Lloyd:

The Georgia Environmental Protection Division (EPD) received and reviewed your Voluntary Investigation and Remediation Plan and Application (VIRP Application) dated December 28, 2012 for Former Rose City Cleaners Site. EPD provides the following comments:

1. Please collect soil samples inside the former dry-cleaning building to determine if soil contamination is present and acting as an on-going source for releases of tetrachloroethene (PCE). The previous Compliance Status Report (CSR) did not adequately investigate the existence of potential sources at the site since soil samples were not collected in the locations where the former dry cleaning equipment was located.
2. Please inform EPD as to whether the sublisted property, Thomas County Courthouse Property, will be a qualifying property in the VRP as well.
3. The Conceptual Site Model (CSM) must include all potential human health and ecological receptors, and the complete and incomplete exposure pathways that exist at the site (Section 12-8-108 of the Act). Based on the data provided within the application and data available in the other investigation reports, volatile organic compounds have been detected in groundwater samples collected inside this site and the adjacent proposed Thomas County Courthouse property. Therefore, the vapor intrusion pathway from contaminated groundwater must be evaluated as part of the CSR for onsite and offsite impacted residential and commercial properties.

4. Monitored Natural Attenuation (MNA) was selected as remedy for the contaminated groundwater at the site in your previous CSR and this VIRP Application. Please refer to EPD's comment #3 in its letter to you dated November 1, 2012 to evaluate the effectiveness of the MNA as a remedial option. EPD concurs with Peachtree's proposal that some form of enhanced bioremediation may be conducted at the site if future groundwater concentrations indicate MNA is not an effective remedy.

Please address above comments in your First Semiannual Status Report due August 1, 2013. If you have any questions regarding this matter, please call Mr. Yue Han at 404-657-8678.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Jason P. Chappell, Peachtree Environmental

File: HSI# 10902