



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**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

June 22, 2018

**VIA MAIL AND REGULAR MAIL**

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

Re: 10th Semiannual VRP Progress Report dated February 1, 2018  
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 10<sup>th</sup> Semi-Annual VRP Progress Report dated February 1, 2018 for Former Rose City Cleaners Site. EPD provides the following comments:

1. EPD noted that MW-24 was not sampled during December 2017 sampling event. Please include MW-24 in groundwater monitoring network and sample this well in future. Please be advised that the US EPA Region 4 Science and Ecosystem Support Division operating procedure for groundwater sampling has been revised. The latest version is SESDPROC-301-R4, effective April 26, 2017 (Section 3.4 of the report references SESDPROC-301-R3, which became effective on March 6, 2013).
2. In addition to acquiring groundwater use restriction covenants on properties underlain by the contaminant plume, a groundwater-contaminant fate-and-transport model will be required to demonstrate a stable or shrinking plume in the final Compliance Status Report (CSR).
3. Exposure to VOCs in groundwater via soil vapor intrusion is a potential complete pathway of exposure. EPD concurs with your proposal that Indoor Air Quality will be evaluated and a vapor mitigation approach will be incorporated into the correction action plan if necessary.
4. EPD concurs with your Proposed Future Work of Section 4.0 of the 10<sup>th</sup> Semiannual VRP Progress Report.

10<sup>th</sup> Semiannual VRP Progress Report  
Former Rose City Dry Cleaners Site, HSI # 10902  
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Please address above comments in the next Progress Report due August 1, 2018 or in the VRP CSR due on February 1, 2019. Also please note that this VRP site will be transferred to our newly-formed VRP unit after July 1, 2018. If you have any questions regarding this matter, please call Mr. David Hayes of the VRP Unit at 404-657-8600.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: John P. Martiniere, Peachtree Environmental  
File: HSI# 10902