



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

January 12, 2018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: 8th Semiannual VRP Progress Report dated February 1, 2017
9th Semiannual VRP Progress Report dated August 1, 2017
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 8th Semi-Annual VRP Progress Report dated February 1, 2017 and 9th Semi-Annual VRP Progress Report dated August 1, 2017 for Former Rose City Cleaners Site. EPD provides the following comments:

1. EPD hereby approves the modifications to the groundwater-sampling itinerary proposed in Section 4.3, with the following exceptions:
 - MW-21 and MW-24 should remain in the groundwater-sampling itinerary.

Accordingly, our understanding of the upcoming modification to the sampling itinerary is that the following wells will be omitted during future groundwater-sampling events: DW-1, MW-1, MW-4, MW-8, MW-9, MW-10, MW-11, MW-13, MW-20, MW-22, and MW-23.

2. A groundwater-contaminant fate-and-transport model will be required in the VRP CSR to demonstrate that the Point of Exposure will not be impacted above residential risk reduction standards. Please tabulate input data so that EPD can replicate the model run, if necessary.
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 sampling be performed within the TNB bank building to address potential concerns regarding vapor intrusion.

4. The groundwater contamination plume should continue to be monitored for its migration and attenuation of contaminant concentrations. Based on the monitoring results, additional indoor air quality sampling may be needed for all buildings overlying the plume, including the County Courthouse, and downgradient houses if EPD considers them as enclosed buildings.
5. EPD concurs with your Proposed Future Work of Section 4.0 of the 9th Semiannual VRP Progress Report.

Please address above comments in the next Progress Report slated to be the Compliance Status Report for the site. 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: John P. Martiniere, Peachtree Environmental
File: HSI# 10902