

**Land Protection Branch**

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

April 26, 2018

**VIA U.S. MAIL**

**AND EMAIL: [LLG3@bellsouth.net](mailto:LLG3@bellsouth.net)**

Ideal Cleaners and Shirt Laundry of LaGrange, Inc.  
c/o Lewis Goode, III  
224 Greenville Street  
LaGrange, GA 30241

Subject: EPD Comments  
Voluntary Investigation and Remediation Plan dated October 26, 2017  
Ideal Cleaners (HSI 10931)  
224 Greenville Street, LaGrange, Troup County, Georgia  
Tax Parcel No. 050-3B-018-006

Dear Mr. Goode:

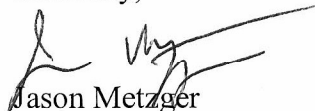
The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated October 26, 2017 that was submitted as an application for enrollment in the Voluntary Remediation Program (VRP). EPD has the following comments:

1. It is the responsibility of the applicant and the professional engineer/geologist in charge of the investigation and remediation to obtain any permits, variances, or authorizations necessary to conduct land disturbing activity in proximity to Oseligee Creek. This may include obtaining a stream buffer variance from EPD and authorization from the United States Army Corps of Engineers, if applicable. More information is available at the following EPD webpages:  
  
[www.epd.georgia.gov/erosion-and-sedimentation](http://www.epd.georgia.gov/erosion-and-sedimentation)  
[www.epd.georgia.gov/erosion-and-sedimentation-forms](http://www.epd.georgia.gov/erosion-and-sedimentation-forms)
2. Further evaluation is needed before proceeding with in-situ groundwater remediation, such as chemical oxidation or a permeable reactive barrier, to ensure that Oseligee Creek will not be adversely affected and that the selected technology has the capability to meet remedial objectives. Please present an evaluation of groundwater remedial options in the first progress report. This evaluation should include an analysis of potential effects to Oseligee Creek.
3. The soil disposal manifests presented in Appendix 7 of the VIRP show that soil from the 2014 excavation was identified as both a listed (U210) and a characteristic (D039) hazardous waste. For future soil excavation, please note that soil identified as containing a listed hazardous waste remains as such unless a "contained-in" determination can be made by EPD.
4. Surface water and sediment samples should be collected from Oseligee Creek to evaluate current conditions. Surface water and sediment sampling results should be presented in the first progress report.

5. In the first progress report, please describe how the vapor intrusion pathway will be evaluated.
6. Section 1.2 states that Ideal Cleaners occupies the eastern section of the building and an insurance company occupies the western section; however, during the January 22, 2015 site visit, EPD observed Ideal Cleaners in the western section of the building and the insurance company in the eastern section of the building. Please verify this information in the first progress report.
7. Please provide the laboratory analytical reports for all analytical data reported in the VIRP.
8. Please provide well logs for monitoring wells MW-1, MW-2, MW-3, MW-4 and MW-5.
9. Comments related to tables and figures:
  - a. For the September 2017 sampling events, please provide a brief explanation as to the difference between the sample identification numbers given in the laboratory reports and the sample identification numbers shown in the tables and figures.
  - b. Please add the concentration measurement units to Table 3 and note that these delineation standards are for soil. A similar table of delineation standards should be included for groundwater.
  - c. For soil boring DP-7 22-23.5', the concentrations shown on Table 1 and Figure 4 differ. Please verify the concentration and correct as necessary.
  - d. Please include concentration measurement units on Table 2.
  - e. Please include units of measurement on Table 4.
  - f. For the groundwater sample collected from soil boring B-4, the concentrations shown on Table 2 and Figure 5 differ. Please verify the concentration and correct as necessary.
  - g. Vinyl chloride was detected in the groundwater sample collected from soil boring B-2. Please add this data to Table 2 and Figure 5.

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 Ideal Cleaners. However, failure of EPD to respond to a submittal within any timeframe does not relieve Ideal Cleaners from complying with the provisions, purposes, standards, and policies of the Act. If you have any questions, please contact Ms. Susan Kibler at 404-657-7126.

Sincerely,



Jason Metzger  
Program Manager  
Response and Remediation Program

- c: Mike Haller (via email: [mike@sailors-engineering.com](mailto:mike@sailors-engineering.com))  
Scott Laseter (via email: [slaseter@kmccllaw.com](mailto:slaseter@kmccllaw.com))

File: 247-0064 (VRP)

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