

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

January 30, 2015

MAILED
1-30-15

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

IPTV-B-C14, LLC
c/o Mr. Dewayne Bailey, Vice President
8401 North Central Expressway, Suite 910
Dallas, TX 75225

Re: Voluntary Investigation and Remediation Plan Application, October 6, 2014
TLC Cleaners
2060 Lower Roswell Road, Suite 100
Marietta, Cobb County, GA 30068
Parcel #: 16124400330

Dear Mr. Bailey:

The Georgia Environmental Protection Division (EPD) has reviewed the October 2014 Voluntary Investigation and Remediation Plan (VIRP) submitted for the subject property pursuant to the Georgia Voluntary Remediation Program Act (VRPA) O.C.G.A. 12-8-100. EPD has the following comments:

1. The application suggests that groundwater flows toward the southeast, but this assumption must be supported by site data. The flow direction must be measured, not assumed, by taking groundwater elevations from permanent wells and creating a potentiometric surface map.
2. Section 3.2 references a discussion in Section 5.4 as justification for a lack of groundwater compliance certification. Section 5.4 does not exist in this report, but it appears that section 5.2.2 provides the relevant context, citing section 12-8-107(g)(2) of the VRP Act. Please revise or clarify this statement as necessary.
3. The report identifies vapor intrusion as a potential exposure pathway in section 4.5, but no vapor intrusion investigation is proposed. At a minimum, the Site should be screened for vapor intrusion susceptibility using the Johnson and Ettinger model. A copy of the modeling results, as well as any parameters used as inputs, should be included with the first semiannual progress report.
4. Please include a figure showing the location of samples with respect to property lines in future monitoring reports. The current sample map, shown in Figure 6 of Appendix C, does not show the proximity to nearby properties, particularly the residences directly south of the site.
5. A groundwater criterion for xylenes was not provided in Table 1 of the Risk Reduction Standards (RRS). Appendix III, Table 1 of the HSRA Rules lists a value of 10 mg/L for xylenes (total). This omission affects the derivation of the RRS for xylenes. Please revise all affected tables accordingly.

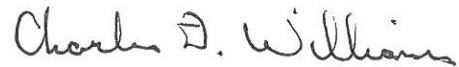
IPTV-B-C14, LLC must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole

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discretion, review and comment on documents submitted by IPTV-B-C14, LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve IPTV-B-C14, LLC from complying with the provisions, purposes, standards and policies of the Act.

If you have any questions, please contact Jonathan Callura of the Response and Remediation Program at (404) 232-1502.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

C: Justin Vickery, EPS

File: TLC Cleaners (VRP Program)