

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

May 9, 2016

VIA U.S. MAIL AND E-MAIL

IPTV-B-C14, LLC
c/o Dewayne Bailey
8401 North Central Expressway, Suite 910
Dallas, Texas 75225

Re: VRP Progress Report, July 2015
VRP Compliance Status Report, November 2015
VRP Compliance Status Report Addendum, February 2016
TLC Cleaners
2060 Lower Roswell Road
Marietta, Cobb County, Georgia 30068

Dear Mr. Bailey:

The Georgia Environmental Protection Division (EPD) has reviewed the July 2015 Voluntary Remediation Program (VRP) Progress Report, the November 2015 VRP Compliance Status Report (CSR), and the February 2016 VRP CSR Addendum. EPD has the following comments:

1. The CSR does not include a certification of compliance with Risk Reduction Standards (RRS). A signed certification of compliance with applicable RRS is needed for EPD to be able to concur with RRS compliance.
2. Section 5.1 of the CSR states that soil is in compliance with residential and non-residential RRS. However, Figure 7 indicates that tetrachloroethene in soil that was not excavated (e.g., SB-33 and SB-34 at 10 feet) exceeds the proposed residential Type 2 RRS.
3. A monitoring and maintenance plan will be needed for any engineering controls (such as the vapor mitigation system) that are being used to control exposure pathways.
4. A Uniform Environmental Covenant (UEC) will be needed to document engineering and institutional controls (e.g., vapor mitigation system, non-residential use) that are being used to control exposure pathways. More information about UECs is available at:

<https://epd.georgia.gov/uniform-environmental-covenants>

5. The sub-slab and indoor air sampling data in the CSR Addendum demonstrates that the vapor mitigation system is currently needed to control the vapor intrusion pathway. Further sampling is needed to assess the effectiveness of the vapor mitigation system and to demonstrate that the extent of tetrachloroethene in soil gas has been adequately characterized. Additional sampling should include the following:
 - a. Repeated sampling of the indoor air and sub-slab sampling locations shown in Figure 3 of the CSR Addendum. Sub-slab sampling should include pressure measurements to demonstrate the influence of the vapor mitigation system.
 - b. Sub-slab and indoor air sampling in the unit to the east of sampling locations IA-2 and SG-7.
 - c. Exterior soil gas sampling to the south of the former dry cleaner unit.

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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 VRP Act. The additional indoor air and soil gas sampling data should be submitted by July 30, 2016. If you have any questions, please contact Nicole Vermillion at 404-463-0530.

Sincerely,



David Hayes
Acting Unit Coordinator
Response and Remediation Program

c: Justin Vickery, P.G., EPS (via e-mail)
Craig K. Pendergrast, Taylor English Duma LLP (via e-mail)

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