GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
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404-657-8600

February 1, 2018

YNH Properties LLC
c/o Mr. Se Hong Yi, Managing Member
3296 Summit Ridge Parkway Suite 420
Duluth, GA 30096

Subject: Westside Cleaners (Former)
VRP Progress Reports #1 (December 30, 2016) and #2 (August 4, 2017)
700 Sandtown Road, Marietta, Cobb County, Georgia
Tax Parcel 17021400790; HSI No. 10927

Dear Mr. Yi:

The Georgia Environmental Protection Division (EPD) has reviewed the subject progress reports prepared and submitted by Sailors Engineering Associates (SEA) on your behalf (YNH Properties LLC; YNH) and has the following comments. EPD has also received the subsequent semi-annual progress report for the subject site, which is currently under review and will be addressed under separate cover. Please note that many of the comments contained within this letter are likely to be applicable to the third Progress Report as well.

June 30, 2016 Voluntary Remediation Program Acceptance Letter Condition:

1. The property at 840 Sandtown Road (Tax Parcel 17021300270; Figure 3 of Progress Report #1) is a non-qualifying property impacted by the release at the subject Property. Please either 1) apply to include the referenced non-participating property as a qualifying property in the VRP, or 2) notify EPD that the non-qualifying property is not to be included under the Georgia Voluntary Remediation Program Act (the Act) by no later than *June 30, 2018*.

June 30, 2016 Voluntary Investigation and Remediation Plan (VIRP) Comment Letter:

2. **EPD Comments #5, through 11, 14, 16 through 18, 20, 21, and 23:** These comments address expectations regarding data acquisition procedures and documentation/presentation and have not been adequately addressed by the subject submittals. EPD is requesting a face-to-face meeting with YNH's environmental consultant for the subject VRP Property to discuss these comments. Please have Mr. Michael Haller of SEA contact Ms. Carolyn L. Daniels, P.G. of my office at his earliest convenience to arrange for the requested meeting.
3. **EPD Comment #3b:** EPD cannot eliminate 1,4-dioxane as a constituent of concern (COC) since the standard practical quantitation limit for EPA Method 8260 is not low

enough to determine if 1,4-dioxane is present at concentrations of concern. Selective ion monitoring (SIM) must be used in conjunction with EPA Method 8260 in order to obtain the appropriate practical quantitation limit (PQL)/detection limit (20 µg/L or less). Please collect: 1) A minimum of one to two soil samples from immediately above the water table in locations where soil contamination has historically been most elevated and 2) Groundwater samples from monitoring wells MW-5 and MW-9 during the next scheduled investigation at the site and analyze for 1,4-dioxane using EPA Method 8260 with SIM. If not detected in either sample media using the referenced analytical methodology, 1,4-dioxane may be eliminated as a COC for the site.

4. **EPD Comment #4:** The term "site" is improperly applied to refer to only tax parcel 17021400790 (the current VRP Property), when at least one additional property (see Comment #1 above) has been impacted by the subject release of regulated substances, throughout the subject submittal. Please refer to any properties that have been accepted into the Voluntary Remediation Program (VRP) to address cleanup of contamination as "VRP Properties", reserving the term "site" for the extent of contamination above delineation standards.

5. **EPD Comment #12:**

   a. Ecological receptors cannot be eliminated based on the data acquired to date. Groundwater analytical results acquired from newly installed monitoring well MW-9 indicate that the potential for impacts to Ollie Creek should be investigated. Please include the collection and analysis of surface water and sediment samples from Ollie Creek during future groundwater investigations. Based on the results of said sampling, an ecological risk assessment may become necessary.

   b. Preferential contaminant migration pathways, such as the presence of underground utilities, should be evaluated and depicted on site maps and cross-sections to determine if they could be transport mechanisms for impacting potential receptors such as Ollie Creek.

6. **EPD Comment #13a: Proposed Risk Reduction Standards (Progress Report #1):**

   a. **Appendix 9, Table 2:** The soil Type 1 RRS are correct for all regulated substances presented in Table 2. However, for consistency, please revise the following discrepancies in Table 2:
      i. The correct notification concentrations (NCs) for ethylbenzene and 1,4-dichlorobenzene are 20 mg/kg and 6.84 mg/kg respectively.
      ii. The Type 1/3 groundwater RRS marked "NL" (i.e., not listed) should be based on the detection limit (defined as the standard analytical Practical Quantitation Limit for the analytical method used) for the regulated substance. In such cases, the "groundwater x 100" term should be calculated by multiplying the detection limit by 100. Please revise these parameters for 1,1,2,2-tetrachloroethane and isopropylbenzene (cumene).
      iii. The correct Type 1/3 groundwater RRS for chloroform is 0.08 mg/L.
      iv. Please provide units for all parameters in the table.

   b. **Appendix 9, Table 3:** The soil Type 2 RRS are incorrect for all regulated substances presented in Table 2 and will need to be revised based on the following:

i. The Risk Assessment Guidance for Superfund (RAGS)[1] Equations 6 and 7 results for both child and adult receptors for the Type 2 soil RRS evaluation were incorrect for isopropylbenzene, methylene chloride, PCE, toluene, trans-1,2-dichloroethylene, trichloroethylene (TCE), vinyl chloride, and xylene. In addition, the RAGS Equation 7 values for the adult receptor were incorrect for all constituents. Since the input parameters were not provided, the reason for this discrepancy is unclear. It was also noted that for many substances, the RAGS Equation 6 results were not provided even though the substances had cancer toxicity values available (e.g. methylene chloride, PCE, vinyl chloride). Please update all RAGS results for the soil Type 2 RRS evaluation and provide all input parameters, equations and sample calculations for review.

ii. The correct Type 2 groundwater RRS was provided for 1,1,2-trichloroethane, 1,1-dichloroethane, 1,2-dichlorobenzene, acetone, and xylenes. However, the remaining substances in Table 3 list the incorrect groundwater Type 2 RRS. Please provide all input parameters, equations, sample calculations, and the revised groundwater Type 2 RRS as needed.

iii. Please update all leachability (Type 2 Partitioning Equation) values based on the correct groundwater input term.
   - Please note that the higher of the groundwater Type 1 or Type 2 RRS can be used in the SSL derivation.
   - All input parameters, including groundwater concentration used in the soil partitioning equation [dilution attenuation factor (DAF), default parameters, etc.] and sample calculations must be provided for review. It appears that a DAF of 20 was used in SEA's calculations; therefore, justification must be provided to demonstrate the source area(s) is less than 0.5-acre, which should include a figure with an outline showing the extent/specific dimensions of the source area based on soil analytical results.

c. **Appendix 9, Table 4:** The soil Type 3 RRS are correct for all regulated substances except chloroform. The correct subsurface soil (>2 feet) Type 3 RRS for chloroform is 8 mg/kg, based on the correct 'Type 1 groundwater x 100' value. Please revise accordingly.

d. **Soil Type 4 RRS:** The RAGS Equations 6 and 7 results were not presented, and it appears that the Type 4 RRS was based solely on the SSL evaluation. Both sets of values should be presented for the soil Type 4 evaluation. Please present the surface and subsurface Type 4 RRS separately for review.

e. **Groundwater Type 4 RRS:** The groundwater Type 4 RRS was incorrect for the following constituents: 1,1,2,2-tetrachloroethane, 1,2-dichloroethane, 1,4-dichlorobenzene, chloroform, ethylbenzene, and vinyl chloride. Please revise the RRS and update the soil Type 4 SSL values for the aforementioned substances.

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[1] *Risk Assessment Guidance for Superfund: Volume I – Human Health Evaluation Manual (Part B, Development of Risk-based Preliminary Remediation Goals).*

7. **EPD Comment #15:** The cost estimate requested in the original comment was not provided in either of the subject submittals. Please include the requested estimate in the next scheduled progress report to be submitted by June 30, 2018.
8. **EPD Comment #17:** This comment has not been adequately addressed and will be a specific point of discussion in the face-to-face meeting requested in Comment #1 of this letter. Please note that Region 4, U.S. Environmental Protection Agency (USEPA), Science and Ecosystem Support Division (SESD) groundwater sampling Standard Operating Procedures (SOPs) referenced in the subject submittals (SESDPROC-301-R3, effective March 6, 2013) have been replaced by SESDPROC-301-R4 (effective April 26, 2017). Future groundwater purging and sampling events should be conducted in accordance with the revised SOPs.

Please contact the EPD site compliance officer, Ms. Daniels, via telephone at (404) 657-8646 or via email at carolyn.daniels@dnr.ga.gov if you or your consultant have any questions regarding the above comments.

Sincerely,

David Hayes
Unit Coordinator
Response and Remediation Program

c: Michael Haller, P.G., Sailors Engineering Associates, Inc. (e-mail)

File: 245-0486 (VRP); HSI 10927
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