

Georgia Department of Natural Resources

Environmental Protection Division

2 Martin Luther King, Jr. Dr., S.E., Suite 1054 East, Atlanta, Georgia 30334

Judson H. Turner, Director

Land Protection Branch

Phone: 404/657-8600 FAX: 404/657-0807

March 6, 2014

Louis Silverstein
EDSPEN, LLC
2568 Central Avenue
Augusta, Georgia 30904

COPY

VIA EMAIL AND REGULAR MAIL

Re: Supplemental Comments on Voluntary Investigation and Remediation Plan Addendum
Silverstein's Cleaners, HSI Site Number 10875
Martinez, Georgia; Columbia County

Dear Mr. Silverstein:

The Georgia Environmental Protection Division (EPD) has completed its review of the Voluntary Investigation and Remediation Plan (VIRP) Addendum, received by EPD on January 13, 2014, and submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100, et seq., as an application for the site's entry into the Voluntary Remediation Program (VRP). In our letter of March 6, 2014, we notified EDSPEN, LLC, that the application has been conditionally approved. We have provided additional comments below.

1. Source material appears to extend beyond the three pre-designated source areas. Concentrations of tetrachloroethene in soil and groundwater near and at the southern property boundary indicate the possible presence of dense non-aqueous-phase liquid in the subsurface. Remedial planning should consider the possible presence of a source area on this part of the site.
2. Please provide a table listing the delineation standards for each constituent of concern in soil and groundwater on site, pursuant to Section 12-8-108(1) of the VRP Act.
3. Upon the completion of additional soil sampling and associated site remediation, please provide appropriate updated figures and cross sections that illustrate the site's surface and subsurface setting to support the graphic three-dimensional conceptual site model required by Item #5 of the application checklist.
4. Any off-site samples should be included in a supporting site figure that illustrates the extent of these properties and their relation to the site.
5. In each semiannual report submitted under the VRP, please provide a detailed narrative of protocols utilized during the most recent groundwater-sampling event. The narrative should include detailed information on sampling equipment, collection techniques, sample handling/preservation, and decontamination procedures. EPD prefers use of the "soda straw" method when sampling groundwater with a peristaltic pump for volatile organic compound (VOC) analysis, but may accept other methods on a case-by-case basis. VOC sampling must be conducted with teflon tubing when certifying to risk reduction standards.

Proper groundwater-sampling methodology must be followed, or EPD may disallow future groundwater-analytical results and require resampling. The groundwater-sampling methodology

required by EPD is specified in the USEPA Region 4 Field Branches Quality System and Technical Procedures, Science and Ecosystem Support Division (SESD OPs), "Procedure SESDPROC-301-R3, Groundwater Sampling," effective date March 6, 2013. The SESD OPs, which can be accessed on the Internet at <http://www.epa.gov/region4/sesd/fbqstp/>, supersede the USEPA "Environmental Investigations Standard Operating Procedures and Quality Assurance Manual", November 2001.

6. In each semiannual report submitted under the VRP, please include field logs for the most recent groundwater-sampling event. Note that on all groundwater-sampling field logs, the depth to the tube or pump intake should be included. When conducting low-flow sampling or micropurging, the pump intake should be positioned in the middle of the screened interval, whereas with a traditional multi-volume purge, the pump intake should be positioned near the top of the water column.

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

If you have any questions, please contact Allan Nix at (404) 657-8600.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Mr. Jason Chappell, Peachtree Environmental (via email)

File: HSI Site Number 10875