

August 29, 2018

VIA E-MAIL AND U.S. MAIL

Quadrant Real Estate Advisors LLC
c/o Mr. Preston McFarland, Asset Manager
12375 Morris Road, Suite 100
Alpharetta, Georgia 30004

Re: July 2018 Progress Report
Vogue Cleaners at Columbia Square Shopping Center, HSI #10394
4020 Washington Road
Martinez, Columbia County
Tax Parcel ID: 079 087

Dear Mr. McFarland:

The Georgia Environmental Protection Division (EPD) has completed its review of the July 2018 Progress Report dated July 31, 2018 for the above referenced site. EPD appreciates your response in addressing our June 4, 2018 comments, and concurs with the future investigation activities proposed in the July 2018 Progress Report, including:

- Additional Voluntary Corrective Action – Enhanced Fluid Recovery (EFR) associated with monitoring well MW-8R. Based on fluctuating concentrations of COCs in MW-8R, an extended EFR is planned to extract impacted groundwater and soil vapor for a period which may last up to 30 days. It is noted that the 30-day period may be extended or reduced based on the results of the off-gas monitoring conducted as part of the EFR event;
- Decommissioning of monitoring wells MW-8R and MW-12D;
- Completion of a comprehensive groundwater monitoring event after the completion of the EFR event which is anticipated to occur in October 2018 and include sampling groundwater monitoring wells MW-1, MW-4, MW-2R, MW-5, MW-6, MW-8S, MW-22, POD-1, and POD-2;
- Sub-slab soil gas sampling; and
- Submittal of a Revised VRP Compliance Status Report (CSR) by December 31, 2018.

In addition, EPD has the following comments:

- 1.- Please ensure that monitoring wells MW-8R and MW-12D are decommissioned in accordance with EPA guidance SESDGUID-101-R1 Design and Installation of Monitoring Wells, effective January 29, 2013. Over-drilling and removal of the well casing and filter pack is the preferred method, followed by pressure-grouting of the borehole. Additionally, based on the proximity of replacement

well MW-8S (within 2 feet of MW-8R), care should be used when pressure grouting MW-8R during the decommissioning process to prevent cross-communication of grout materials to the screened interval of well MW-8S.

2. In Section 2.3 Groundwater Sampling, it is noted that low-flow sampling techniques were utilized during the May 2018 purging/sampling of monitoring wells MW-5, MW-8S, and POD-2; and June 2018 purging/re-sampling of monitoring wells MW-8S and POD-2. Further, it was noted that USEPA Region IV SESD standard operating procedures dated November 1, 2007 were utilized as part of the purging/sampling and field parameter monitoring/stabilization process.

Please note that USEPA SESD Operating Procedures have been updated since November 1, 2007 with the newest procedures outlined in Section 3 (and applicable subsections) of SESDPROC-301-R4 dated April 26, 2017. Please ensure that the most recent USEPA procedures are utilized as part of ongoing monitoring well sampling activities.

3. EPD notes in Section 3.2 Groundwater Sampling Results that results of the initial sampling associated with monitoring well MW-8S (replacement well for MW-8R) were considered to be erroneous as analytical results did not correlate with historical data for MW-8R (located approximately 2 feet away). As such, an additional sampling event was conducted in June 2018 which included both MW-8S and newly installed well POD-2 in an effort to verify initial results from May 2018. Re-sampling in June 2018 provided results more consistent with historical data for the Site.
4. A number of inconsistencies were noted regarding the documentation of sampling activities. Specifically,
 - a. Section 2.3 Groundwater Sampling states that initial samples were collected on May 24-25, 2018 and that subsequent sampling was conducted on June 12, 2018.
 - b. Figure 3 depicts analytical data call-out boxes for the wells sampled showing sampling dates of 5/18 and 7/18.
 - c. Table 2 presents sampling data for MW-5 for July 2017 and May 2018; for MW-8S for May 2018 and June 2018; and for POD-2 for May 2018 and June 2018.
 - d. Low-Flow Purging and Sampling Log Forms and analytical data report chain-of-custody forms report sampling dates of May 24-25, 2018 and June 12, 2018.

Please correct these inconsistencies as part of future reports.

5. Elevated turbidity readings (i.e., greater than 10 NTUs) were noted at the time of sampling during both the May and June 2018 sampling events associated with monitoring well MW-8S. Please ensure that turbidity readings less than 10 NTUs are achieved consistent with applicable USEPA SESD procedures prior to sampling as part of future sampling events

6. Recent groundwater data for MW-5 shows PCE (37 µg/L) and TCE (8.1 µg/L) greater than current residential RRS. Site maps in the Progress Report show MW-5 on Tax Parcel 079 133 (Columbia County Car Care Center), which was removed from the Hazardous Site Inventory in 2017 based on compliance with residential RRS. Please clarify which property MW-5 is located on. EPD will defer further comment until post-EFR groundwater sampling results can be evaluated.
7. Please note that the current PCE concentration (21,000 µg/L) in the new source area monitoring well MW-8S exceeds the value (10,000 µg/L) utilized as part of the fate and transport model presented as part of the revised Compliance Status Report (CSR) dated October 25, 2016. An updated groundwater fate and transport model may be needed depending on the results of the EFR.
8. Given the recent groundwater results from POD-2 (PCE concentration of 9,900 µg/L, TCE concentration of 4,500 µg/L, and cis-1,2-DCE concentration of 2,700 µg/L) consideration should be given to expanding the planned EFR event to include the area of POD-2 in addition to MW-8R.
9. Please ensure that proper Quality Assurance/Quality Control measures are conducted in support of the proposed sub-slab soil gas sampling, including appropriate leak testing of soil vapor implants prior to conducting sampling activities.

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. In accordance with the schedule provided within the July 2018 Progress Report, EPD anticipates receipt of the Revised VRP CSR for the Site by December 31, 2018.

If you have any questions, please feel free to contact Will Lucas (404) 656-3851, or via email at william.lucas@dnr.ga.gov.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

cc: Mark Mitchell, Genesis Project, Inc. (via email) <mmitchell@genproject.com>

File: 232-0028 (C034), VRP