

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

August 19, 2013

VIA E-MAIL AND REGULAR MAIL

Dr. Harinderjit Singh
Columbia Car Care Center
3685 Wheeler Road, Suite 201
Augusta, Georgia 30909

FILE COPY

RE: Voluntary Investigation and Remediation Plan and Application, February 21, 2013
Comment Letter
Columbia Car Care Center, HSI No. 10394
4014 Washington Road, Martinez, Columbia County, Georgia
Parcel ID: 079 133 (1.78 Acres)

Dear Dr. Singh:

The Georgia Environmental Protection Division (EPD) has reviewed the February 21, 2013, Voluntary Investigation and Remediation Plan (VIRP) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). During our review, EPD also considered the May 1, 2013 comments from Genesis Project, Inc. regarding your application. Although we do not know the mechanism of the release on your property, we continue to concur that there are two separate releases. EPD has approved the VIRP, which specifies the following corrective action. The comments below should be addressed pursuant to the Act:

- Excavation of impacted soils on qualifying property,
 - Monitored natural attenuation for groundwater,
 - Exposure pathway modeling and possible development of revised cleanup standards.
1. Figure 3 indicates that groundwater flow is to the northwest. Based on that flow direction, a source originating from the Columbia Square Shopping Center is unlikely to contaminate Dr. Singh's Columbia Car Care Center (CCCC) property. However, the potentiometric map is suspect given that it does not correlate with MW-11D elevations or, if MW-11D was excluded as the other deep wells were, it is only based on data from two wells. Please clarify in future reports and provide appropriate justifications for excluding data from any of the wells.
 2. The most current groundwater data was not used in depicting conditions on the Columbia Square Shopping Center property in Figure 6. Updated data for that property was available in their September 2012 Progress Report; however, Figure 6 inexplicably provides data from January 2010. Additional data has since been provided in their March 2013 Progress Report and the results (including MW-5 and MW-22) demonstrate that the plumes are currently not comingled. Please provide updated figures in future progress reports.
 3. EPD does not agree that off-gassing from chlorinated solvent impacted shallow groundwater can generate the reported volatile organic compounds (VOCs) in soil at the elevated levels seen in current and historical sampling.
 4. The soil Type 1/3 risk reduction standards (RRS) for tetrachloroethylene (PCE) and cis-1,2-dichloroethylene are incorrect in Table 3.2.2. The correct values are 0.5 mg/Kg and 7.0 mg/Kg respectively, based on 100 times the groundwater standard. Please note that you may delineate to the Type 1 RRS in lieu of background as allowed by the Act.

5. Section 4.3 notes that revised RRS will be calculated and presented in the final compliance status report (CSR). EPD recommends that the participant finalize approval of all cleanup standards prior to submittal of the final remediation plan. Furthermore, execution of a Uniform Environmental Covenant may be appropriate to ensure future exposure assumptions.
6. Figure 7B, Conceptual Site Model (CSM), does not meet the intent of the Checklist and does not provide relevant information regarding the potential migration of contamination. In future reports, the CSM should be more clearly portrayed with a combination of plan views and cross sections rather than the three-dimensional view attempted in Figure 7B. The cross section should be corrected to show the wells in the same order as depicted on the line-of-section figure and should include recent groundwater concentrations.
7. Section 5 of the application checklist requires that the CSM include an evaluation of the potential human health and ecological receptors. The VIRP fails to include this and proposes to include it in the CSR. The first progress report should include a complete evaluation which should be updated in future submittals per the checklist.
8. Historical soil data should be incorporated into appropriate figures. For example, the 'Estimated Extent of PCE in Soil' Figure in the May 15, 2007 J. Dunaway Co. report shows that soil contaminated above Type 1 RRS extends further north to MW-5DD and further east towards MW-11D, than what is depicted in Figure 5A and 5B of the VIRP. This historical sampling may also be used to satisfy some of the delineation gaps noted in Section 3.5.1.

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

EPD is encouraged by your participation in the VRP. Based on the soil and groundwater results submitted we agree that the property can be brought into compliance within the target date. We anticipate receipt of the first semi-annual progress report by February 19, 2014. If you have any questions, please contact Montague M^cPherson of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Martin A. Shelton, Scoggins & Goodman, P.C.
Robert Poole, AXA Equitable Life Insurance Co.

File: HSI No. 10394

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