

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334

Reply To:
Response and Remediation Program
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Office 404/657-8600 Fax 404-657-0807

Mark Williams, Commissioner
Environmental Protection Division
Judson H. Turner, Director
Land Protection Branch
Keith M. Bentley, Branch Chief

June 5, 2012

FILE COPY

VIA E-MAIL AND REGULAR MAIL

Sandy Head Incorporated
c/o Mr. Eric Wallens, Administrator
Post Office Box 99501
Seattle, WA 98139-0501

Re: 1st Semi-Annual Progress Report dated March 21, 2011
2nd Semi-Annual Progress Report dated September 2011
3rd Semi-Annual Progress Report dated March 19, 2012
B&L Discount Auto Repair, HSI Site No. 10890
3769 Flat Shoals Parkway, Decatur, DeKalb County, Georgia
Tax Parcel ID 15-089-02-005

Dear Mr. Wallens:

The Georgia Environmental Protection Division (EPD) has received and reviewed the 1st Semi-Annual Progress Report dated March 21, 2011, the 2nd Semi-Annual Progress Report dated September 2011, and the 3rd Semi-Annual Progress Report dated March 19, 2012 for the B&L Discount Auto Repair site in Decatur, Georgia. EPD provides the following comments:

1. EPD acknowledges that a soil excavation was completed; however, there were contaminated soils at the site left with concentrations of PCE above the Type 3 risk reduction standard (RRS). Therefore, the conceptual site model (CSM) for the property must be revised to incorporate the direct contact pathway and the vapor intrusion pathway. It is also unclear what future remedial actions Sandy Head proposes for contaminated soils left at the site.
2. EPD received a complaint recently stating that the former dry-cleaning machine was still inside the building and contained residual chemicals. The complainant also mentioned a chemical odor. EPD conducted a site inspection on May 25, 2012; however, the building appeared to be closed and unoccupied. Please provide information regarding the status of the former dry-cleaning machine in the next semi-annual progress report.
3. Please list soil Type 1 and 3 RRS values separately in Table 1 – Soil Laboratory Analysis Summary Table of the 3rd Semi-Annual Progress Report, if they are different in values.
4. EPD cannot concur as yet with the statement on page 6 of the first Semi-Annual Progress Report that “this site should be treated as soil-only under the aforementioned guidelines.” Groundwater needs to be investigated in order to determine if the site would list for the groundwater pathway using the Reportable Quantity Screening Method. In addition, groundwater contamination may potentially affect both the surface water pathway and the vapor intrusion pathway. EPD also acknowledges the difficulty of bedrock at shallow depth at the site and is willing to discuss options for addressing the groundwater issue.

5. Delineation criteria must be proposed for the newly detected regulated substances at the qualifying property. At this time, only tetrachloroethene has an approved delineation criteria.
6. EPD has not received financial assurance for the investigation and cleanup of the site as required by Condition 1 of EPD's September 21, 2010 approval letter.
7. Sandy Head, Inc. has not provided EPD a copy of the deed notice as required by EPD's letter dated October 22, 2010 changing the classification of the site from Class II to Class V.

EPD may, at its sole discretion, review and comment on documents submitted by Sandy Head, Inc. However, failure of EPD to respond to a submittal within any timeframe does not relieve Sandy Head, Inc. from complying with the provisions, purposes, standards and policies of the Voluntary Remediation Program Act.

Please address the above comments in the next Semi-Annual Progress Report due September 21, 2012. If you have any questions, please contact Mr. Yue Han of the Response and Remediation Program at (404) 657-8678.

Sincerely,



David Brownlee
Acting Program Manager
Response and Remediation Program

c: Michael J. Haller, Sailors Engineering Associates, Inc.

File: HSI Site Number 10890