



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

March 12, 2018

PM, Ltd.
c/o Joan B. Sasine, Esq.
Bryan Cave
One Atlantic Center, 14th Floor
1201 W. Peachtree St., NW
Atlanta, GA 30309

Subject: VRP Compliance Status Report (CSR) Addendum dated August 15, 2017
Imperial Cleaners (Former), HSI #10690
1233B Alpharetta Highway, Roswell, Fulton County
Tax Parcels 12-1993-0450-063-5 and 12-1993-0450-062-7

Dear Ms. Sasine:

The Georgia Environmental Protection Division (EPD) has reviewed the subject submittal that was prepared and submitted by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler) on behalf of PM, Ltd. It was submitted in response to the EPD comment letter dated June 30, 2017 regarding the July 27, 2016 Voluntary Remediation Program (VRP) Compliance Status Report (CSR).

In regard to your response to Comment 5, EPD notes that in accordance with Section 391-3-19.02(2)(v) of the Rules for Hazardous Site Response, the "Site" is the portion of property affected by a release exceeding a reportable quantity (i.e., portions of tax parcels 12-1993-0450-063-5 and 12-1993-0450-062-7). Both of these tax parcels were identified in the VRP application and are considered to be enrolled in the VRP.

EPD finds the portions of the VRP CSR and VRP CSR Addendum regarding groundwater conditions and compliance certification to be complete with respect to the Georgia VRP Act and the Rules for Hazardous Site Response. With respect to soil, the Brownfield Unit of EPD has received a Prospective Purchaser Compliance Status Report (PPCSR) dated July 31, 2017 establishing soil conditions and certifying soil compliance with Type 3 Risk Reduction Standards (RRS), which are the same as the Type 1 RRS for the constituents of concern.


Based on Figures 4, 6, and 7 of the PPCSR, Figure 4 of the VRP CSR, and Sheet 2 of 3 of a surveyed land plat in the subject VRP CSR Addendum, EPD finds that soil and groundwater contamination have been adequately delineated to within the boundaries of a 2.63-acre area consisting of portions of tax parcels 12-1993-0450-063-5 and 12-1993-0450-062-7 in the vicinity of the former Imperial Cleaners facility (the source of soil and groundwater contamination). This 2.63-acre area is identified as Lot 2, Block A on the land plat and as Parcel 2 + Tract A on

Figure 1 of the VRP CSR Addendum. Therefore, the extent of the HSI Site is considered to be within the boundaries of the 2.63-acre area.

Based on the VRP CSR, VRP CSR Addendum, and PPCSR, EPD concurs with your certification in the VRP CSR Addendum that the 2.63-acre area, identified as tax parcel 12-1993-0450-063-5 (Parcel 2) and tax parcel 12-1993-0450-062-7 (Tract A), is in compliance with Type 1 RRS for soil. Once a Uniform Environmental Covenant with appropriate activity and use limitations has been fully executed and filed with the county deed records, EPD can concur with your certification that the 2.63-acre area is in compliance with Type 5 RRS for groundwater and this Site can be removed from the HSI.

If you have any questions, please contact Ms. Carolyn L. Daniels, P.G. at (404) 657-8646.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: Charles Ferry, Wood (via email)
Stephanie Horwitz, EPD Brownfield Unit (via email)
Scott Hitch, Hitch Law (via email)
Kevin McGowan, Contour Engineering (via email)

File: 261-0571 (VRP)

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