Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

June 4, 2015

COPY

Mr. Richard E. Bowen
c/o Mr. Richard A. Wingate
Hallman & Wingate, LLC
166 Anderson St. SE, Suite 210
Marietta, GA 30060

Re: Voluntary Remediation Program Progress Report 7, October 21, 2014
Roswell Cleaners, HSI Site No. 10883
Roswell, Fulton County, Georgia
Tax Parcel ID: 12-1902-0412-061-6

Dear Mr. Bowen:

The Georgia Environmental Protection Division (EPD) has received the Voluntary Remediation Program Progress Report submitted on October 21, 2014. EPD has reviewed the report and has the following comments:

Sampling Methods:

1. According to the EPA Science and Ecosystem Support Division's Standard Operating Procedure for groundwater sampling (document number: SESDPROC-301-R3), turbidity must either be stabilized or below 10 NTUs prior to sampling. Field records submitted with this report indicate that turbidity in wells MW-2, MW-3, and MW-4 was not sufficiently stable after purging. Furthermore, MW-4 is missing data points for specific conductivity and turbidity. These discrepancies should be avoided in future sampling events.

2. Well purging and sampling data forms should include purging and sampling methods, as well as pump or tubing placement in the water column. The groundwater purging and sampling event should be summarized in the report, and any deviation from the SESD document should be discussed. EPD strongly discourages the use of bailers for purging and sampling.

Delineation:

3. EPD does not agree that horizontal and vertical delineation for soil and groundwater has been completed at the site. Soil is not vertically delineated at boring B-7, due to detections of PCE and TCE above the applicable RRS values at depths of 10 and 15 feet. Additionally, vinyl chloride (VC) was detected in groundwater at MW-2 during the most recent sampling event. EPD may require the installation of an additional well to delineate at this location if VC and cis-DCE concentrations persist.

4. The report proposes Type III Risk Reduction Standards (RRS) for soil and groundwater delineation criteria. According to section 12-8-108(1) of the Georgia Voluntary Remediation Program Act, default residential cleanup standards should be used since the concentrations at the site exceed residential standards. In this case, the values for Type I and Type III RRS are the same for all relevant constituents, so the values remain valid and are approved by EPD.

Figures and Charts:

5. The PCE concentration at MW-4 on Figure 8 does not match the data provided for the March 2014 sampling date, as labeled on the figure. The figure is incorrectly labeled and should be dated August 2014, which matches the 0.028 mg/L PCE detection.

6. The time-trend chart for MW-2 lists the incorrect concentration for cis-DCE in August 2014. This data point should be 0.025 mg/L, not 0 mg/L. Additionally, the MW-3 time-trend chart contains an error for the VC concentration in 2008. This chart lists the concentration as 0.0036 mg/L, whereas Table 2 shows the value as ND (0.002). Please amend these errors in future reports.

7. The axis values on the time-trend chart for MW-4 make it difficult to distinguish between the detected compounds. Please resize this figure or alter the y-axis scale to promote legibility in future reports.

8. At various points in the report, the titles "MW-6" and "MW-6D" appear to be used interchangeably for the 70' deep well screened between 65-70'. In particular, Figures 7G, 7H, 7I, and 8 all list the well northeast of MW-3 as "MW-6," whereas Table 2 lists "MW-6" and "MW-6D" as separate wells. Please remain consistent with the well titles to prevent confusion.

General Comments:

9. Page 5 of the report states that "Compounds detected in MW-2 are from an offsite source or sources." Differences in contaminants of concern between MW-2, MW-3, and MW-4 are cited as justification for this claim. It appears equally likely that the detections in MW-2 are from a previous onsite release, since the facility operated as a dry cleaner as early as the mid-1960s. There have been no samples collected upgradient of MW-2, and no evidence has been provided to support the assumption of an upgradient source.

10. The sub-slab vapor samples detailed in the report are insufficient for vapor intrusion screening purposes, and to evaluate a soil release. Soil samples should be collected from beneath the building slab, particularly around the dry cleaning machine area and any other areas where dry cleaning fluids were used or stored. Using this newly collected data, in conjunction with historic detections, please submit the results of the Johnson and Ettinger vapor intrusion screening model with the next report.

11. In the summary on page 4, in the section "*Complete Horizontal Delineation Where Access is not Available,*" it states that the farthest downgradient well, MW-6, has not had detections in three consecutive sampling events. According to Table 2, this well has only been sampled once.

12. Please consider submitting a draft Uniform Environmental Covenant (UEC) for EPD review. The UEC should restrict site usage to non-residential purposes and limit groundwater usage at the site. A model UEC may be found on the EPD website at the following website:

    https://epd.georgia.gov/uniform-environmental-covenants

13. Please resubmit discs with progress reports 5 and 6 along with the next monitoring report.

14. EPD agrees with the conclusion that sampling and/or excavation should be conducted upon any decision to remove or significantly alter the building. However, EPD does not

agree with your claim that "no groundwater modeling is warranted at this time, as delineation onsite has been effectively completed," because of the errors outlined in comment 2, and because modeling is necessary for groundwater contaminant plumes to understand and predict their threat to downgradient receptors.

If you have any questions regarding this Site, please contact Jonathan Callura of my staff at (404) 232-1502.

Sincerely,

David Reuland
Unit Coordinator
Response and Remediation Program

CC: Peter Kallay, AEC