

Environmental Protection Division

2 Martin Luther King, Jr. Dr., Suite 1456, Atlanta, Georgia 30334

Judson H. Turner, Director

Land Protection Branch

Phone: 404/656/7802 FAX: 404/651-9425

Reply To:

Response and Remediation Program
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Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

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November 19, 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Hollie W. Lloyd
Group Vice President
Thomasville National Bank
301 N. Broad Street
Thomasville, Georgia 31792

Re: First Semi-Annual VRP Progress Report dated August 1, 2013
Former Rose City Cleaners Site, HSI # 10902
301 N. Broad Street
Thomasville, Thomas County, Georgia 31792

Dear Ms. Lloyd:

The Georgia Environmental Protection Division (EPD) received and reviewed your First Semi-Annual VRP Progress Report dated August 1, 2013 for Former Rose City Cleaners Site. EPD provides the following comments:

1. Based on data collected, including groundwater flow direction at the site (towards southwest as shown in Figure 3) and the detected high concentration of PCE in MW-5 (900 ug/L as shown in Figure 7), it may be worthwhile to collect several soil samples in the area up-gradient of MW-5 inside the building to determine the possible sources of PCE contamination. If the interior of the building is inaccessible, you may consider the Horizontal Directional Soil Sampling Technique which is able to directly access the contaminated areas under buildings.
2. Vapor intrusion should be evaluated due to the high PCE concentration detected in groundwater near the building and current use of the building as a bank branch office. You may collect sub-slab samples in conjunction with soil borings inside the building to evaluate the impact of vapor intrusion.
3. The proposed locations of new wells, as indicated on Figure 13, are acceptable to EPD. Data from those wells will aid in achieving horizontal delineation of the dissolved plume and in preparing a groundwater-contaminant fate-and-transport model. If changing any of the proposed well locations becomes necessary, please contact EPD for pre-approval.

4. EPD disagrees with the contention that site data suggests strong evidence for reductive dechlorination. Specifically:
 - a. The source of the input data on the US EPA Natural Attenuation Screening Protocol scoresheet was not indicated. Table 4 lists MW-2, MW-3, MW-5, and MW-6 as being wells from which MNA parameters were obtained. If screening-protocol scores from multiple wells are being averaged, then those wells should be located on the same part of the site, i.e., source-area wells would be averaged together for one score, wells immediately downgradient of the source area would be averaged together for another score, etc. Using this method, different areas of the site should have different screening-protocol scores.
 - b. Over a four-year monitoring period, PCE concentrations in MW-2, MW-3, MW-5, and MW-6 have fluctuated and have not followed clearly defined downward trends.
 - c. The absence of vinyl chloride in groundwater suggests that any reductive dechlorination that is occurring may be stalling at DCE.

EPD is doubtful that MNA will remediate this site to an applicable RRS within the timeframe specified by the VRP. At some point, MNA may need to be enhanced or otherwise supplemented with one or more additional remedial technologies to meet applicable RRSs in a timely fashion.

5. Please indicate whether the Thomas County Courthouse Property will be included as a qualifying property in the next progress report. Without the enrollment of the Thomas County Courthouse in VRP, that property would be subject to the requirements of the Rules for Hazardous Site Response.
6. Please clarify the soil Type 1/3 RRS values for PCE listed in Table 2.5.1-Type 1/3 Soil RRS of the Report.

Please address above comments in your Second Semi-Annual Status Report due February 1, 2014. If you have any questions regarding this matter, please call Mr. Yue Han at 404-657-8678.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Jason P. Chappell, Peachtree Environmental
File: HSI# 10902



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Horizontal Directional Soil Sampling

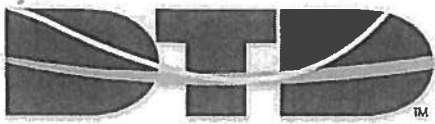
Horizontal Directional Soil Sampling allows clients to obtain soil samples from hard to reach places, remotely, with virtually no impact to their job site.

Examples of where HDSS shines include: underneath buildings, roadways, parking areas, run ways, water features, etc.

During the sampling process we are able to take multiple samples at different depths and distances without the rig ever moving to a different location. Once the sampling has been completed we are able to seal our borehole to ensure that the contamination will not migrate.

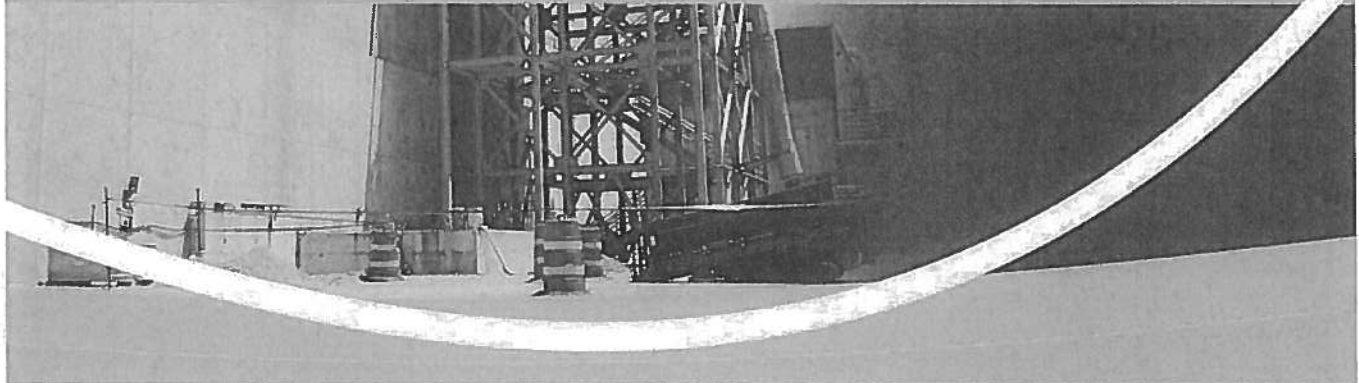
Here are a few advantages of HDSS:

- The ability to directly access contaminated areas under buildings, highways, environmentally sensitive areas, runways, industrial areas, water course's, etc.
- The ability to gain access to isolated areas from a long distance away.
- The ability to access areas where traditional vertical bores are not feasible due to access issues or reinstatement costs.
- The ability to take multiple samples at different elevations and horizontal alignments in a contaminated area, from one bore hole rather than multiple bore holes.
- Minimal disruption to a job site as well as minimal restoration.



Directed Technologies Drilling Incorporated

SAMPLING UNDER TANKS, BUILDINGS AND ROADS



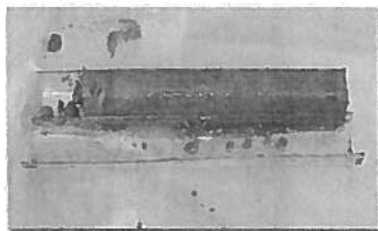
Soil Sampling in "Inaccessible" Areas

Directed Technologies Drilling has the expertise and technology to make site investigation and soil sampling at previously inaccessible locations a reality.

SOIL SAMPLING UNDER INFRASTRUCTURE

Site investigation at active facilities can be difficult to impossible using traditional soil sampling techniques. Potential contamination source areas are often under infrastructure (i.e., above or below ground storage tanks) and inaccessible.

Directed Technologies Drilling has developed soil sampling equipment and techniques for use with directional drilling rigs that allow for soil sample collection from beneath site structures.



DIRECTIONAL DRILLING & SOIL SAMPLING

While the process is time consuming and can be difficult, it allows samples to be collected from locations it was previously impossible to reach. The idea is simple, advance a borehole to the proposed soil sampling location using

Lateral Thinking Yields Better Solutions

Directed Technologies Drilling, Inc. (DTD) is a leader in horizontal directional drilling (HDD) technology. Our objective is complete client satisfaction. We apply experience and innovative thinking to provide quality service that is unrivaled in the industry.

DTD has the most experienced team of professionals in the business. James Doesburg, President, is a recognized authority on HDD and pioneered many of its innovations and environmental applications. Principals and project managers have academic degrees in geology or hydrogeology and are recognized authorities in the field by groups including the Colorado Center for Environmental Management, the University of Wisconsin and the National Ground Water Association.

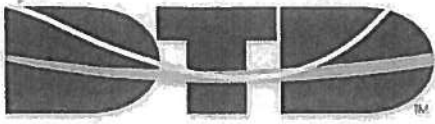
DTD has offices in Washington state and Pennsylvania and has completed projects in 29 U.S. states, Mexico, Europe and Japan.

Coupling technical experience with an unblemished safety record and a team of HAZWOPER trained employees, DTD is the clear choice for your directional environmental drilling needs.



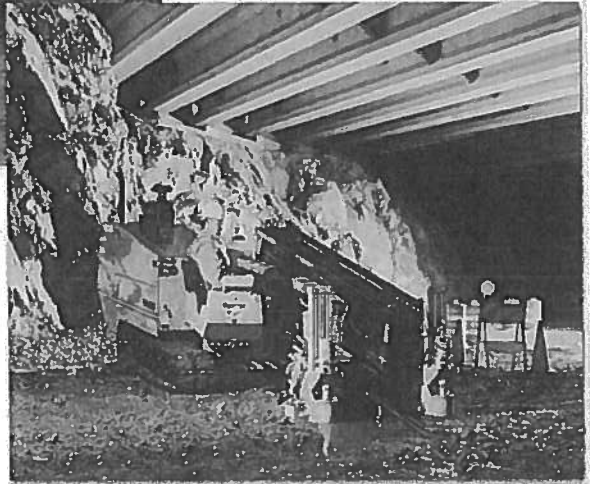
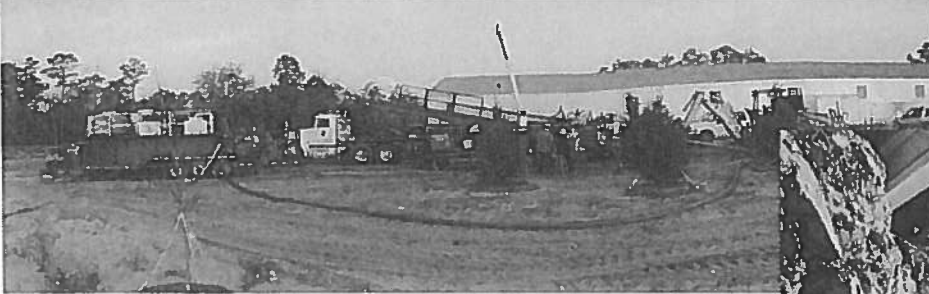
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8626 South 228th Street
Kent, WA 98031

800.239.5950
info@horizontaldrill.com
horizontaldrill.com



Directed Technologies Drilling Incorporated

SAMPLING UNDER TANKS, BUILDINGS AND ROADS



directional drilling. Remove the drill bit from the bore, attach the soil sampling device and advance it into the borehole with the drill rig. The sampler is driven all the way to the proposed sampling location in a closed position, preventing any soil or debris from entering the sampler. Once at the targeted location, the sampler is mechanically opened and locked into position; this locking allows it to be driven or rotated into the undisturbed soils at the sample location. Once the sample is taken, the drill rods and sampler are retrieved from the borehole, sampler removed and drill bit placed back onto the drill rods. The drill bit is driven back into the borehole, and drilling progresses to the next sample location.

ABOUT THE SAMPLES

The soil samples collected using these techniques are 12 inches in length and slightly less than 2 inches in diameter. **Directed Technologies Drilling**

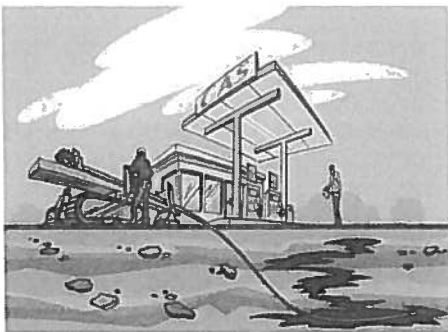
has successfully sampled in fine to medium grained cohesive soils.

The application may be limited by very low or very high cohesive strength soils, but modification to the sampling technique may allow sampling in a wider variety of settings.

CONTACT US TO LEARN MORE

Please contact us to discuss your site specific conditions and determine whether or not soil sampling with directional drilling equipment may work for you.

Contact us at 800.239.5950 or info@horizontaldrill.com.



DTD's Commitment to Health & Safety

At **Directed Technologies Drilling, Inc.** safe completion of every project is of utmost importance. Our field teams are small, efficient and highly experienced by design. All of our employees have completed the Occupational Safety and Health Administration's (OSHA) 40-hour HAZWOPER training (1910.120) and have up-to-date 8-hour refresher training.

DTD's safety record is remarkable. With an unblemished safety record and no lost time injuries, our crews are the best and safest available in the horizontal environmental drilling business.



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