

# Georgia Department of Natural Resources

## **Environmental Protection Division**

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Judson H. Turner, Director

Land Protection Branch

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### **Reply To:**

Response and Remediation Program

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Office 404/657-8600 Fax 404-657-0807

September 28, 2015

### **CERTIFIED MAIL**

### **RETURN RECEIPT REQUESTED**

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

Re: Third Semi-Annual VRP Progress Report dated July 31, 2014  
Fourth Semi-Annual VRP Progress Report dated January 31, 2015  
Fifth Semi-Annual VRP Progress Report dated July 31, 2015  
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 Third Semi-Annual VRP Progress Report dated July 31, 2014, Fourth Semi-Annual VRP Progress Report dated January 31, 2015, and Fifth Semi-Annual VRP Progress Report dated July 31, 2015 for Former Rose City Cleaners Site. EPD provides the following comments:

1. The recent data show the increased concentrations of PCE in groundwater in monitoring wells MW-2, MW-3, and MW-5 from December 2014 to June 2015. It warrants a further investigation of potential sources at the site, more specifically, inside the current building on site. You may perform your proposed Modified Active Gas Sampling survey to identify the sources at site.
2. EPD concurs with your proposed enhanced reductive dechlorination (ERD) approach to enhance existing biological degradation. Should future groundwater data support the effectiveness of the anaerobic biochem (ABC) injections, EPD recommends installation of additional ABC injection points in the source area around MW-5.
3. On VRP sites, a groundwater-contaminant fate-and-transport model is often run to determine if the POD well will be impacted by groundwater contamination from the source area(s). In the comment-response letter to EPD dated February 1, 2015, which is included in Appendix F of the Fourth Semiannual VRP Progress Report, the RP declines to conduct the additional model run requested by EPD. Accordingly:

- a. Continued sampling of MW-14, the POD well, will likely be required on a periodic basis into the future, even if the site is eventually removed from the HSI. Lacking supporting data in the form of modeling, EPD does not necessarily agree that the plume has reached its maximum downgradient extent.
- b. The Biochlor model runs presented in the September 2011 CSR/CAP and in VRP Semiannual Report 2 will not be accepted as support for future arguments regarding source attenuation, plume migration, plume expansion, or contaminant concentrations downgradient from the source area.
4. Installation of a deep well will be required to complete VRP requirements for vertical delineation of groundwater contaminants. EPD had previously approved the location of a deep well in the vicinity of MW-5. EPD does not agree that the installation of boring EB-1 constitutes vertical delineation, for the following reasons:
  - a. A groundwater sample from EB-1 was not obtained and laboratory-tested.
  - b. Installation of a deep well is the preferred method by which to obtain vertical delineation of groundwater impact. The narrative on page 7 of the Fifth Semiannual VRP Progress Report states that boring EB-1 was terminated when the “regional confining layer” was encountered at 40 feet below ground surface (BGS), whereas the EB-1 boring log in Appendix D specifies a termination depth of 63 feet BGS. A deep well to 63 feet BGS, on top of the confining layer, would have been 29 feet deeper than source well MW-5, and may have provided vertical delineation.
  - c. Installation of wells through confining layers – including aquicludes, aquitards, and bedrock – is common. Use of double or triple casing is required to prevent cross-contamination of aquifers.
6. In the case the PCE concentrations continue to increase, vapor intrusion should be re-evaluated to demonstrate that there would be no health impact on the people working inside the building at the site.

Please address above comments in the next Progress Report for the site. 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: John P. Martiniere, Peachtree Environmental

File: HSI# 10902

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