

# Georgia Department of Natural Resources

## Environmental Protection Division

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June 7, 2013

**COPY**

Edspen, LLC  
c/o Mr. Louis Silverstein  
2568 Central Avenue  
Augusta, Georgia 30904

**VIA EMAIL AND REGULAR MAIL**

Re: Additional Comments on August 2012 Voluntary Investigation and Remediation Plan (VIRP)  
Silverstein's Cleaners, HSI Site Number 10875  
Martinez, Georgia; Columbia County

Dear Mr. Silverstein:

The Georgia Environmental Protection Division (EPD) has completed its review of the August 2012 Voluntary Remediation Program (VRP) application that was submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, et seq. In our letter of June 3, 2013, we notified Edspen, LLC, that the application is incomplete and that submittal of a revised Voluntary Investigation and Remediation Plan (VIRP) will be necessary. We have provided additional comments below.

1. Source material appears to extend beyond the three pre-designated source areas. Concentrations of tetrachloroethene (PCE) in soil and groundwater near and at the southern property boundary indicate the possible presence of dense non-aqueous-phase liquid (DNAPL) in the subsurface. Remedial activities should take into consideration the presence of a possible DNAPL source zone on site.
2. Upon the completion of additional soil sampling and associated site remediation, please provide appropriate updated figures and cross sections that illustrate the site's surface and subsurface setting to support the graphic three-dimensional conceptual site model required by Item #5 of the application checklist.
3. Any off-site samples should be included in a supporting site figure that illustrates the extent of these properties and their relation to the site.
4. We note that only PCE concentrations are indicated on Figures 5A and 5B. In future submittals, figures depicting contaminant concentrations in soil should show all contaminants detected. If necessary, separate figures may be prepared for different contaminants.
5. The groundwater-sampling methodology required by EPD is specified in the EPA Region 4 Field Branches Quality System and Technical Procedures, Science and Ecosystem Support Division (SESOPs), "Procedure SESOPROC-301-R3, Groundwater Sampling," effective date March 6, 2013. The SESOPs, which can be accessed on the Internet at <http://www.epa.gov/region4/sesd/fbqstp/>, supersede the USEPA "Environmental Investigations Standard Operating Procedures and Quality Assurance Manual" (EISOPQAM), November 2001.

In a revised VIRP, please provide a detailed narrative of protocols utilized during the most recent groundwater-sampling event on site. The narrative should include detailed information on sampling equipment, collection techniques, sample handling/preservation, and decontamination procedures. EPD prefers use of the "soda straw" method when sampling groundwater with a peristaltic pump for volatile organic compound (VOC) analysis, but may accept other methods on a case-by-case basis. VOC sampling must be conducted with teflon tubing when certifying to risk reduction standards (RRSs). Please note that EPD may disallow future groundwater-analytical results and require resampling of all wells if the required groundwater-sampling methodology is not followed.

6. Groundwater-sampling field logs were not included in the report. In a revised VIRP, please include field logs for the most recent groundwater-sampling event. Note that on all groundwater sampling field logs, the depth to the tube or pump intake should be included. When conducting low-flow sampling or micropurging, the pump intake should be positioned in the middle of the screened interval, whereas with a traditional multi-volume purge, the pump intake should be positioned near the top of the water column.
7. Tables 2 and 3 contain several errors related to incorrect detection limits for various analytes. Figure 7 also incorrectly lists 1,1-DCA at 16 ug/L at MW-9 when it was actually <5.0 ug/L according to the laboratory report. Please crosscheck Tables and Figures thoroughly with analytical data to keep data transcription errors to minimum.

At some point in the VIRP process, Edspen, LLC will need to address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards, and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Edspen, LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve Edspen, LLC from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Allan Nix at (404) 657-8600.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: Mr. Jason Chappell, Peachtree Environmental (via email)  
Ms. Kimberly Stevens, Hawkins and Parnell

File: HSI Site Number 10875