

Georgia Department of Natural Resources
Environmental Protection Division

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334
Judson H. Turner, Director
Land Protection Branch
Keith M. Bentley, Branch Chief
Phone: 404/657-8600 FAX: 404/657-0807

June 5, 2013

COPY

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Notice of Incomplete Voluntary Remediation Program Application
Silverstein's Cleaners, HSI Site No. 10875
3818 Washington Road, Martinez, Georgia; Columbia County
Tax Parcel ID No. 078D046B

Dear Mr. Silverstein:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated August 31, 2012, submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) as an application for the site's entry into the Voluntary Remediation Program (VRP). In conjunction with review of the VIRP, we have also reviewed the Response to General Comments, dated March 15, 2013, from EPD's May 17, 2012, Conditional Soil Corrective Action Plan (CAP) Approval. EPD has determined that the VIRP is incomplete and that submittal of a revised VIRP will be necessary. Our comments are provided below.

- 1) EPD conditionally approved a CAP for this site in our letter of May 17, 2012. The CAP proposed excavation with off-site disposal, along with soil-vapor extraction (SVE), to remediate contaminant concentrations in soil to within applicable risk reduction standards (RRSs). However, the VIRP states that remedial methods on site are being reevaluated. Furthermore, in the Response to General Comments under General Comment #2, Peachtree Environmental reiterates that it intends to excavate the source area and that SVE will not be utilized on site. Please specify if soil excavation will be conducted only within the source area, or if excavation will be used to remediate all site soil that exceeds the applicable RRSs.
- 2) A plan for groundwater corrective action is not included in the VIRP. As stated in Section 12-8-107(a) of the Act, "The voluntary investigation and remediation plan shall be in such streamlined form as may be prescribed by the director; provided, however, that the plan shall, at minimum, enumerate and describe those actions planned to bring the qualifying property into compliance with the applicable cleanup standard..."
- 3) Individuals within the buildings overlying the groundwater plume could be exposed to harmful vapors via vapor intrusion from the subsurface. Please provide a plan for evaluating the potential vapor-intrusion pathway within any off-site buildings that may overlie the groundwater plume. Preferably, the plan should include an EPA-recognized or otherwise peer-reviewed vapor-intrusion model (Johnson & Ettinger is an example of one such model).

- 4) Neither a point of exposure nor an associated point of demonstration were specified in the VIRP. Under the Act, a point of exposure is defined as the nearest of the following locations:
 - The closest existing downgradient drinking water supply well
 - The likely nearest future location of a downgradient drinking water supply well where public supply water is not currently available and is not likely to be made available within the foreseeable future; or
 - The hypothetical point of drinking water exposure located at a distance 1,000 feet downgradient from the delineated site contamination.
- 5) Section 4.2 "Exposure Pathway Modeling" states "...exposure pathway monitoring may be conducted to determine whether potentially completed pathways may cause exposure at a receptor." However, it appears significant information is available to develop a site conceptual model (CSM) that adequately illustrates the complete and potentially relevant exposure pathways and all potential site receptors. Please provide a CSM that illustrates potential receptors and exposure pathways. The Conceptual Site Model (CSM) must present a graphic, three-dimensional model that lists all complete and incomplete pathways, as well as all potential receptors:
 - a. The Conceptual Site Model (CSM) must present a graphic, three-dimensional model that lists all complete and incomplete pathways (i.e. residential, construction/utility worker, vapor intrusion, etc.) as well as all potential receptors, including the surface water runoff/drainage pathway as it relates to the nearest downgradient surface water body.
 - b. If the cleanup standards for soil are based on Type 2, 4 or 5 RRS, then soil concentrations must be protective of groundwater at an established point of exposure for groundwater (i.e., property line) or at a hypothetical point of drinking water exposure located at a distance of 1000-feet downgradient from the delineated site contamination.
- 6) Please note that delineation values for the constituents of concern in soil and groundwater have not been provided. Please propose delineation concentrations that meet these standards and an investigation plan to demonstrate horizontal and vertical delineation.

Please submit a revised VIRP to EPD by August 30, 2013. Edspen, LLC must 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,



Derrick Williams
Program Manager
Response and Remediation Program

c (via email): Jason Chappell, Peachtree Environmental

File: HSI No. 10875