AECS
American Environmental & Construction Services, Inc.
1170 Tidwell Road
Alpharetta, GA 30004

May 11, 2016

Ms. Carolyn Daniels, P.G.
Georgia Environmental Protection Division
Response & Remediation Program
Floyd Towers East, Suite #1054
2 MLK Jr., Drive, S.E., Atlanta, Georgia 30334-9000

Re: VRP Application Update – ISCO Soil Blending Strategy
Former Silverstein's Cleaners Site, HSI No. 10517

Dear Ms. Daniels,

As discussed during our meeting on April 18, 2016, BCRE Investments, LLC (BCRE) wishes to update the Voluntary Investigation and Remediation Plan (VIRP) for the Former Silverstein's Cleaners Site (Site) to include the use of in situ soil blending as an additional technique for treating contamination at the Site. The Georgia Environmental Protection Division (EPD) has already approved the use of in situ chemical oxidation (ISCO) using injection wells as the delivery mechanism. ISCO has been occurring at the Site since 2009.

In an effort to more aggressively address residual contamination, in situ soil blending using potassium permanganate will be performed in the primary Area of Concern (AOC) and monitoring well MW-27 area in June 2016. In situ soil blending involves mechanically mixing chemical oxidants so that soil and groundwater can be treated in place. The delivery method overcomes one of the major obstacles for in situ remediation, namely effective and uniform delivery of the treatment chemicals.

Redox Tech, LLC will be performing the soil blending activities in two areas of concern at the Site; the Primary AOC and monitoring well MW-27 areas. The Primary AOC blending area, which is the location of the 2002 soil excavation and the location of the former dry cleaning operation, is approximately 4,700 square feet in area and the target blending interval is from 17 to 30 feet below ground surface (bgs). The second soil blending area is in the vicinity of monitoring well MW-27 and is approximately 670 square feet in area with a treatment interval from the ground surface to 25 feet bgs. The treatment areas are presented in the attached figure.

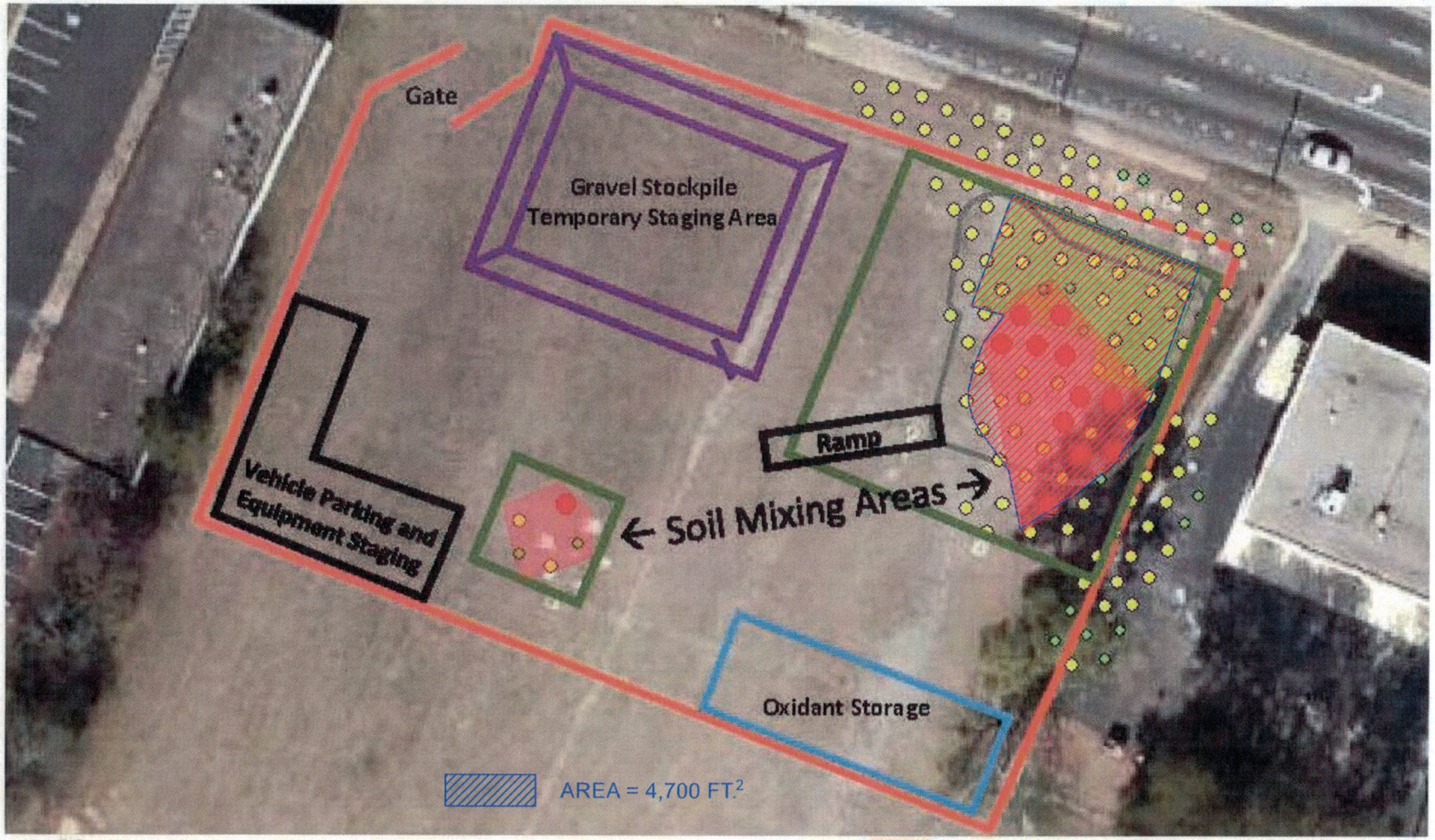
Redox Tech, LLC will be submitting a Design Plan to AECS by the end of May 2016, which we will forward to you for inclusion in the project file. The Site is scheduled to be prepared by AECS the week of June 6, 2016, with soil blending activities to begin June 13, 2016. A Professional Geologist, or someone under their direct supervision, will be on-site during all Site preparation and blending activities. A soil blending report will be prepared by a Professional Geologist and submitted to EPD in the first VRP Progress Report. If you have any questions please do not hesitate to contact me at 770-745-6440.

Sincerely,

Rodger C. Daniel
President AECS

Figure: Proposed Soil Blending Areas

Cc: Darren Meadows, Esq., Hull Barrett



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1 inch = 55 feet

Mixing Volume ≈ (60' * 40') / 27cf/cy ≈ 1155 cy
Gravel Volume ≈ (75' * 75' * 13') / 27cf/cy ≈ 2708 cy

Soil Mixing

Elevated Surface

Area of Original Excavation

Location of Former Dry Cleaner Building

Perimeter Fencing

Injection Well Locations

GW PCE Concentration (µg/L)

<5

6 - 2000

Exceeds 2000 µg/L PCE

AECS American Environmental & Construction Services, Inc.	Alpharetta, Ga Ph. (770) 754-6440	PROJECT Former Silverstein's Dry Cleaners Site HSI #10517	TITLE **Conceptual Site Plan Soil Mixing**	DRAWN BY: PM CHECKED BY: CBD DATE: 3/29/2016