

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

August 14, 2014

VIA E-MAIL AND REGULAR MAIL

John F. Rowan, Sr. Item IV Trust
c/o Catherine Norris
P.O. Box 197
Carmel Valley, California 93924

Re: Voluntary Remediation Program Semiannual Status Report, July 3, 2014
Fashion Care/Executive Care Site, HSI No. 10786
2211 Savoy Drive, Chamblee, Dekalb County, Georgia
Tax Parcel ID Nos. 18-343-13-002, 18-343-13-005, 18-343-13-001, & 18-333-02-023

Dear Ms. Norris:

The Georgia Environmental Protection Division (EPD) has reviewed the July 2014 Semiannual Status Report, submitted in accordance with the Voluntary Remediation Program (VRP) Act for the above referenced site. EPD offers the following comments, which should be addressed pursuant to the Act:

1. The conceptual site model (CSM) cross-section presented in Figure 1 does not show contaminant concentrations superimposed on the stratigraphic features and also does not include vertical and horizontal axes to scale. Please revise this cross section to scale and relocate it to include FMW-6 and FMW-9 so that it parallels the plume axis and includes the items noted above. Two additional cross sections should also be developed perpendicular to A-A'; one across the source area and one along Nancy Creek. Please note that site cross sections should be revised as new site information is obtained, and submitted as part of the updated CSM in each VRP progress report.
2. Based on the cross section provided in Figure 1, there is saprolite beneath the dense dry silt in the vicinity of FMW-4 and MW-23D. Since the attempted deep well, adjacent to FMW-5, went from dry silt to bedrock and was abandoned, there remains a data gap with regard to potential contamination beneath the dry silt as evidenced in the sampling results from MW-23D. If a replacement deep well is no longer proposed, this data gap must be satisfactorily addressed in the fate and transport modeling effort.
3. Please clarify what the flow rate was when the surface water samples were collected on April 28, 2014. In future reports please include this information with the sampling results.
4. Please clarify why the SB wells inside the building, specifically SB-26, were not sampled during the April groundwater sampling event. Please note that for the SB wells and other wells with foot note (3) in Table 1, the (3) footnote is not defined in the table notes.
5. For the low-flow purging method, the pump intake should be placed near the mid-point of the screened interval (see Groundwater Sampling, USEPA SESDPROC-301-R3, Section 3.2.2). This data was not recorded in the field sampling logs. Please place the pump intake at the recommended location in future sampling events and document the location on the field sampling logs.

Fashion Care/Executive Care Site
HSI No. 10786
August 14, 2014
Page 2

The John F. Rowan, Sr. Item IV Trust (Trust) 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 the Trust. However, failure of EPD to respond to a submittal within any timeframe does not relieve the Trust from complying with the provisions, purposes, standards and policies of the Act.

Please address the above comments in subsequent semi-annual progress reports. EPD anticipates receipt of the next report by December 2, 2014. If you have any questions, please contact Robin Futch, P.G., PMP at (404) 657-8686.

Sincerely,



Jason Metzger
Unit Coordinator
Response and Remediation Program

c: Leonard Diprima, Jr., P.G., Woodard & Curran (via email)
H.A. Rowan, Southern Automatic Company (via email)
Marvin Hewatt, Georgia-Alabama Commercial Investments, LLC (via email)
Joel Aultman, ASL Limited Partnership (via email)

File: HSI 10786

S:\RDRIVE\RFutch\HSI Sites\10786-Fashion Care\VRP SA Status Report letter_July 2014.doc