

OCT 25 2011



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October 21, 2011

Ms. Alexandra Y. Cleary
Program Manager
Response and Remediation Program
Land Protection Branch
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Drive, SE
Atlanta, GA 30334-9000

**CERTIFIED MAIL 7004 2510 0005 5732 0485
RETURN RECEIPT REQUESTED**

**Re: Semi-Annual Status Report - October 2011
Voluntary Remediation Program
Roswell Cleaners, HSI Site No. 10883
Roswell, Fulton County, Georgia
Tax Parcel ID No. 12-1902-0412-061-6**

AEC Report REB-2407.01

Dear Ms. Cleary:

Atlanta Environmental Consultants (AEC), on behalf of Mr. Richard E. Bowen, Roswell Cleaners property, 1013 Alpharetta Street, Roswell, Fulton County, Georgia, is pleased to present our first Semi-Annual Status Report for the above referenced facility. The Georgia Environmental Protection Division (Georgia EPD) has accepted Richard E. Bowen into the Voluntary Remediation Program (VRP) in a letter dated April 21, 2011. Initiating, planning, preparation, and progress of the VRP at the Roswell Cleaners property conducted during the six month period between program inception and this report can be summarized as follows:

CORRESPONDENCE WITH THE GEORGIA EPD

The affidavit is being filed with the clerk of the Fulton County Superior Court. A copy of the recorded affidavit will be provided to the EPD once received from Fulton County.

A comments letter was received requesting detail regarding Corrective Actions proposed. AEC responded "Soils in the source area will be horizontally and vertically delineated to the designated delineation standard according to the milestone schedule submitted with the

VRP application. An asphalt cap is the proposed primary remedy, along with necessary institutional controls, if any. Active remediation of soils will be considered if it is determined that the proposed remedy is not protective of human health and the environment". Another comment inquired about controls to limit exposure. AEC responded "In the event the final remedy of the facility involves engineering controls consisting of an asphalt cap, an approved environmental covenant, specifying that the existing cap will be maintained and documenting that construction and utility workers must be notified that protective measures are necessary during any work where soil contamination will be encountered, conforming to O.C.G.A. 44-16-1 et seq., will be implemented for the impacted property". An additional comment requested verification of our travel time prediction from the site to Hog Wallow Creek. AEC prepared and submitted calculations and a map, which have been submitted to the EPD in correspondence dated May 23, 2011

Complete Horizontal Delineation Where Access is Available.

Completion of horizontal delineation where access is available is in the planning stages. Proposed locations for monitoring wells to complete horizontal delineation at the Roswell Cleaners location have been tentatively identified. These wells and locations will be reviewed before finalization of well locations and implementation of additional horizontal delineation activities commence. Each new monitoring well will be surveyed for relative top-of-well-casing elevations relative to the top-of-well-casing elevations of the existing wells.

It is proposed that all wells onsite, including the new wells and the existing wells, be sampled following completion of additional delineation locations, in order to acquire a consistent set of data across the site consisting of samples collected during the same monitoring event. Also, in conjunction with this event, depths to groundwater in all wells, old and new, will be gauged, current water table elevations will be calculated, and data will be developed for presentation (see below).

Updated Conceptual Site Model

The Georgia EPD requested verification of our travel time range estimate of compounds identified onsite from the site to Hog Wallow Creek. Slug test data and calculations supporting the estimated time of travel from the site to Hog Wallow Creek have been prepared and have been submitted to the Georgia EPD to be incorporated in the Conceptual Site Model (CSM) for this site. An appropriate point of demonstration well and groundwater fate and transport model will be used for verification. A revised Site Location Map showing the estimated route of travel is attached. The CSM is hereby revised and updated with the addition of these calculations and map, and the proposed point of demonstration well and groundwater fate and transport model. These additions constitute an Addendum to the CSM.

An updated Conceptual Site Model report will be prepared following completion of horizontal delineation where access is available. Tables listing historical and current groundwater data and elevations, and historical and current groundwater dissolved concentrations will be prepared and included. Existing figures will be updated and/or new Figures will be drafted, as appropriate, showing locations of the new monitoring wells, water table elevations, and dissolved concentrations. Water table elevation equipotential contours will be developed and presented on appropriate figures. Dissolved concentration contours will be developed and presented. The report will present appropriate conclusions and recommendations.

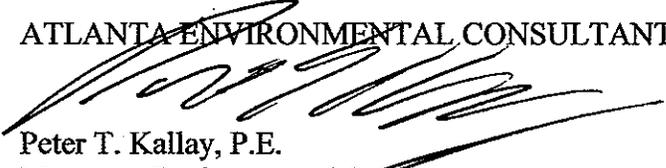
Additional revisions and updates will be made to the CSM as work in support of the implementation of the VRP progresses through scopes of work and activities listed in the Milestone Schedule dated February 28, 2011.

Please do not hesitate to contact us should you have any questions.

Thank you.

Sincerely,

ATLANTA ENVIRONMENTAL CONSULTANTS



Peter T. Kallay, P.E.
Manager, Environmental Services

pc: Jessica Jewell McCarron
Richard E. Bowen
Richard A. Wingate, Esq., Hallman & Wingate LLC