

# Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334  
Mark Williams, Commissioner  
Environmental Protection Division  
F. Allen Barnes, Director  
Land Protection Branch  
Mark Smith, Branch Chief

**Reply To:**  
Response and Remediation Program  
2 Martin Luther King, Jr. Drive, S.E.  
Suite 1462, East Tower  
Atlanta, Georgia 30334-9000  
Office 404/657-8600 Fax 404-657-0807

December 12, 2011

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Jeff Vantosh  
North Highland Associates, LLC  
2520 Peachtree Road NE, Suite 301  
Atlanta, Georgia 30305

Re: Voluntary Remediation Program Application dated March 31, 2011  
Midtown Cleaners Site, HSI #10584  
Atlanta, GA 30308

Dear Mr. Vantosh:

The Georgia Environmental Protection Division (EPD) received and reviewed Environmental Planning Specialists, Inc.'s Voluntary Remediation Program Application (VRP Application) dated March 31, 2011 to EPD for the above referenced site. The following deficiencies are noted:

1. Groundwater needs to be delineated to one of the delineation criteria and a figure depicting the extent of tetrachloroethene (PCE) detected in groundwater at the site included in the application. In addition, the non-detect level for chlorinated solvents in MW-7R was above applicable risk reduction standards.
2. The VRP Application did not provide a figure describing the surface water usage in the area surrounding the site. During a recent site visit, a low elevation area observed southeast of the Buddy's Convenience Store. Please investigate further to determine if groundwater could discharge into and pond in that area thereby completing an exposure pathway.
3. EPD cannot concur with the statement on page 13 of the VRP Application "Modeling has shown that soil vapor intrusion does not pose an unacceptable risk." Since there is a plume of PCE at the site and groundwater flows towards east, PCE and its daughter products may migrate to the areas of MW-10 near residential properties in the future. Therefore, modeling and monitoring of groundwater is necessary to determine the extent of the plume and its possible movement. A model such as BIOCHLOR may be applied to show the extent the plume would migrate. An appropriate fate and transport model may be applied to demonstrate that the concentrations at MW-10 will not be higher than 48.9 ug/L and 3.25 ug/L (or other revised outputs from J&E model) for PCE and TCE, respectively, in the future, and therefore there will be no unacceptable risk of soil vapor intrusion.

4. The vapor intrusion analysis needs to include all VOCs. EPD acknowledges that many of the VOCs are from a contributing plume emanating from Buddy's Convenience Store; however, the overall risk evaluation for vapor intrusion should include all VOCs. Should inclusion of the additional VOCs demonstrate the potential for vapor intrusion above acceptable levels, mitigation will be necessary. EPD is not necessarily requiring Midtown Cleaners to do the mitigation, but we are pointing out that both parties may need to work jointly on a solution if a potential problem does exist.
5. All input data used in J&E model should be listed in a table with explanation or justification for the selection of those values. The building dimensions for the existing residence are the same as that for the convenience store without explanation. If specific measurements for the residence are available, they should be incorporated into the J&E model running for the residential scenario. If the parameters are unknown, the model default values should be assumed. Also, please verify if the residence is constructed on a crawl space. Please be advised that EPA does not recommend applying the J&E model to buildings with crawl spaces. It appears that the toxicity factors used to generate the J&E model output was not updated prior to running the model. The toxicity values should be updated such that they are consistent with those values listed in the most current version of the Regional Screening Level Summary Table.
6. Please provide a milestone schedule for modeling and monitoring of the VOC plume and submission of a final CSR for the site along with your cost estimate for these activities.

Please submit to EPD a revised VRP Application addressing the above comments by February 29, 2012. If you have any questions regarding this matter, please call Mr. Yue Han at 404-657-8678.

Sincerely,



David Brownlee

Acting Program Manager

Response and Remediation Program

c: Justin Vickery, EPS

File: HSI# 10584