

# Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr. S.E., Suite 1462 East, Atlanta, Georgia 30334

## 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

Mark Williams, Commissioner

Environmental Protection Division  
F. Allen Barnes, Director  
Land Protection Branch  
Mark Smith, Branch Chief

December 21, 2010

# FILE COPY

## VIA E-MAIL AND REGULAR MAIL

Mr. Richard E. Bowen  
c/o Mr. Richard A. Wingate  
Hallman & Wingate, LLC  
166 Anderson St. SE, Suite 210  
Marietta, Georgia 30060

Re: Voluntary Remediation Program, May 24, 2010  
Roswell Cleaners & Coin Laundry, HSI Site No. 10883  
Roswell, Fulton County, Georgia  
Tax Parcel ID No. 12-1902-0412-061-6

Dear Mr. Bowen:

The Georgia Environmental Protection Division (EPD) has reviewed the September 7, 2010 letter from Atlanta Environmental Consultants. EPD cannot approve your application due to the following deficiencies that were not adequately addressed by the September 7, 2010 letter as follows:

### Comment 1a and 7

The responses do not adequately address the vapor intrusion pathway. All buildings above, and near the soil and groundwater contamination must be evaluated using either the J&E model, or through indoor air sampling with approved methods. PID readings taken within buildings are not an acceptable method for evaluating the vapor intrusion pathway. In addition, EPD does not agree that compacted soil layers act as confining layers for vertical movement of soil vapors.

### Comment 1b

EPD agrees that concrete and asphalt eliminate direct exposure to soil for current site receptors. However, if the concrete or asphalt is breached due to utility repairs or construction work at the site, direct exposure would now be a complete pathway for site receptors. Since a future breach is likely in a commercial setting, the applicant must calculate site-specific utility and construction worker cleanup standards in accordance with Section 391-3-19-.07(10) of the Rules for Hazardous Site Response, for comparison to soil and groundwater concentrations.

If current soil and groundwater concentrations exceed the calculated values, you may remediate soil to meet those values. Alternatively, you may include language that explicitly states the procedures that will be taken to protect those workers in the uniform

Mr. Richard Bowen  
Roswell Cleaners & Coin Laundry  
December 17, 2010  
Page 2

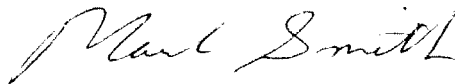
environmental covenant that is needed for groundwater use restrictions, and the concrete and asphalt controls.

Comment 10

Peter Kallay has yet to provide EPD with a monthly summary of hours invoiced and a description of services provided to the voluntary remediation program participant.

A revised application must be submitted by January 31, 2011. The revised application must include the revisions proposed in your September 7, 2010 letter. Please contact Jessica McCarron at (404) 657-8600 with any questions.

Sincerely,

A handwritten signature in black ink that reads "Mark Smith". The signature is written in a cursive style with a large, stylized "M" and "S".

Mark Smith, Chief  
Land Protection Branch

cc: Peter T. Kallay, PE – Atlanta Environmental Consultants, LLC

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