

# 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

April 21, 2011

**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: Revised Voluntary Remediation Plan Application, February 2011  
Roswell Cleaners, HSI Site No. 10883  
Roswell, Fulton County, Georgia  
Tax Parcel ID: 12-1902-0412-061-6

Dear Mr. Bowen:

The Georgia Environmental Protection Division (EPD) has reviewed the February 28, 2011, Revised Voluntary Remediation Plan Application submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has the following comments on the Conceptual Site Model (CSM):

**Soil:**

1. Several different proposed corrective action methods for soil are discussed. An asphalt pavement cap is mentioned; however, the CSM also states on page 3 that "soils in areas where concentrations exceed notification concentrations (NC) will be resampled" and "remediation of soils will be considered." Soil in the source area must be horizontally and vertically delineated.
2. If controls are used to limit exposure, then a Uniform Environmental Covenant will be needed to maintain the existing cap and to document that construction and utility workers must be notified that protective measures are necessary during any work where soil contamination will be encountered.

**Groundwater:**

3. EPD cannot verify the estimate that groundwater will not reach Hog Wallow Creek for 59 to 254 years because those calculations have not been provided and no groundwater modeling or slug test data was presented. An appropriate point of demonstration well and groundwater fate and transport model must be used for verification.

Richard E. Bowen 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 Richard E. Bowen. However, failure of EPD to respond to a submittal within any timeframe does not relieve Richard E. Bowen from complying with the provisions, purposes, standards and policies of the Act.

Mr. Bowen  
Roswell Cleaners  
April 21, 2011  
Page 2

If you have any questions, please contact Jessica McCarron of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Alexandra Y. Cleary  
Program Manager  
Response and Remediation Program

c: Peter T. Kallay, PE – AEC, LLC

File: 10883

S:\RDRIVE\JMcCarron\HSI\Roswell Cleaners\VRP\vrp application comments letter april2011.doc