

**Georgia Department of Natural Resources**  
**Environmental Protection Division**

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334  
Judson H. Turner, Director  
(404) 656-4713; Fax. (404) 651-9425

January 8, 2016

**VIA EMAIL & REGULAR MAIL**

Mr. Jim Schaeffer  
McKenzie Tank Lines  
975 Appleyard Drive  
Tallahassee, Florida 32304

Re: Voluntary Remediation Program Progress Report  
McKenzie Tank Lines Site, HSI# 10406  
Port Wentworth, Chatham County, Georgia  
Tax Parcel ID #s 1-0729-01-007 & 1-0729-01-009

Dear Mr. Schaeffer:

The Georgia Environmental Protection Division (EPD) has received the November 18, 2015, Voluntary Remediation Program (VRP) Progress Report 3, submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by the Environmental International Corporation (EIC) on behalf of McKenzie Tank Lines (MTL). After completing its review of the referenced report, EPD has prepared the following comments:

- 1) Responses to EPD's May 20, 2014, VRP Application Comments letter, which were included in Section 2 of the above referenced progress report, still indicated that information and documentation necessary to address previous comments will be provided in future report submittals. Please ensure that by no later than the November 2016 scheduled VRP Progress Report submittal that the following outstanding issues are addressed: additional groundwater and soil delineation data, additional surface water/sediment sampling and ecological impact evaluation, and a conceptual site model update.
- 2) Section 2 "Responses" indicated that the activities to address the various potential sources of contamination onsite and offsite would be completed in accordance with the established VIRP schedule. As part of the next Progress Report, please include an updated schedule and status update regarding the investigation and corrective action activities that have been or will be completed to address the following: a previous gasoline/diesel release by Georgia Ports Authority (GPA) onsite, the presence of heavy metals detected in the holding pond sample, arsenic detected in monitoring well MW-13S, calculation of site specific vapor intrusion concentrations assessment of onsite vapor intrusion pathways, and the removal/abandonment of the onsite stormwater pipes/drainage culverts with an associated assessment of the soils around these drainage features.
- 3) [Response to Comment (3)] Previous comments noted "possible areas of pipe failures," which in this report were indicated to be depressions resulting from localized sink holes. In accordance with the above listed Comment (2) and the VIRP Application, should these sink holes be repaired or should these pipes and drainage culverts be removed as part of future onsite GPA construction activities, please ensure that the surrounding soils are screened for the contaminants of concern and remediated if necessary.

- 4) [Response to Comment (4)] The Section 2.0 "Response" continues to indicate that the area associated with the "Former Office and Shop" does not warrant any additional investigations. EPD requests that the surface soils (0-2 feet) in this area be screened for the contaminants of concern either by utilizing a photoionization detector (PID) or a GORE Sorber type sampler. The necessity for further assessments in this area can be dependent upon the results of the soil gas screening.
- 5) Please include in future Progress Reports an update on the GPA's gate construction project, in particular any activities that may influence planned corrective actions and the future compliance status of the site.
- 6) EPD does not concur with the conclusion that PCE and TCE have been delineated in groundwater to the Type 1 risk reduction standard (RRS). To complete the required delineation, please conduct additional groundwater investigations in the following locations:
  - a. To the south of MW-32 and MW-47D, between the wells and the surface water feature.
  - b. North of MW-44D, and east of MW-47D and MW-44D.
- 7) EPD concurs with the replacement/abandonment of recovery wells RW-2, -3, -5, -6, and -7.
- 8) The responses to Comments 5-7 included in Section 2.0 are acceptable.

The above listed comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Please provide responses to the above listed comments as part of the next scheduled Progress Report submittal. Should you have any additional questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 657-8660.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: Thomas F. Panebianco, McKenzie Tank Lines (email only)  
Christopher Novack, Georgia Ports Authority (email only)  
Raj Mahadevaiah, Environmental International Corporation (email only)  
File: VRP Application 1391540150 – McKenzie Tank Lines Site #10406