



Our Contribution to the Environment®

ENVIRONMENTAL INTERNATIONAL CORPORATION
161 Kimball Bridge Road, Suite 100, Alpharetta, GA 30009
Phone: 770-772-7100, Fax: 770-772-0555
Email: rajmahadevaiah@eicusa.com
Website: www.eicusa.com

May 9, 2013

DELIVERED VIA FEDEX OVERNIGHT

Dr. Montague McPherson
Georgia Department of Natural Resources
Response and Remediation Program
Suite 1462 East Tower
2 Martin Luther King, Jr. Drive, S.E.
Atlanta, Georgia 30334-9000

**Subject: First VIRP Semi-annual Progress Report
Georgia Ports Authority-Bainbridge Terminal
HSI Site No. 10071
1321 Spring Creek Road,
Land Lot 373, Parcels: 20, 21A, and portion of Parcel 19,
Bainbridge, Decatur County, Georgia**

Dear Mr. McPherson:

On behalf of Georgia Ports Authority (GPA), Environmental International Corporation (EIC) is pleased to submit the attached documents as the First Voluntary Investigation and Remediation Plan (VIRP) Semi-annual Progress Report for the above referenced site.

Enclosed are the following material:

1. One signed and sealed certification page for the Semi-annual Report.
2. One copy of EIC's First VIRP Semi-annual Progress Report.
3. Two Compact Discs each with the report in searchable PDF format.

If you have any questions regarding this submittal, please contact Ms. Natalie Schanze of GPA at 912-963-5595 or me at the above location.

Sincerely,

ENVIRONMENTAL INTERNATIONAL CORPORATION


Raj Mahadevaiah, P.E., C.G.W.P.
President & CEO

Cc: Natalie Schanze, GPA

CERTIFICATION AND SUPPORTING DOCUMENTS
First VIRP Semi-annual Progress Report
Georgia Ports Authority-Bainbridge Terminal
HSI Site No. 10071
May 9, 2013

"I certify under penalty of law that the accompanying report referenced above and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, et seq.). I am a professional engineer who is registered with the Georgia State Board of Registration for Professional Engineers and Land Surveyors/Georgia State Board of Registration for Professional Geologists and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances.

Furthermore, to document my direct oversight of the Voluntary Investigation and Remediation Plan (VIRP) development, implementation of corrective action, and long term monitoring, I have attached a monthly summary of hours invoiced and description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division.

The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Basavaraj Mahadevaiah, GA PE No. 23198
Environmental International Corporation
770-772-7100, ext. 223

5/9/13
Date

Signature and Stamp



HSI SITE 10071, GEORGIA PORTS AUTHORITY-BAINBRIDGE TERMINAL

FIRST VIRP SEMI-ANNUAL PROGRESS REPORT

May 9, 2013

Submitted To:

GEORGIA ENVIRONMENTAL PROTECTION DIVISION

Georgia Department of Natural Resources
Response and Remediation Program
Suite 1462 East Tower
2 Martin Luther King Jr. Drive, S.E.
Atlanta, Georgia 30334

Prepared for:

GEORGIA PORTS AUTHORITY

P.O. Box 2406
Savannah, Georgia 31402

Prepared by:

ENVIRONMENTAL INTERNATIONAL CORPORATION

161 Kimball Bridge Road, Suite 100, Alpharetta, GA 30009, USA
Phone 770.772.7100 • Fax 770.772.0555

<http://www.eicusa.com>

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1 INTRODUCTION

On behalf of Georgia Ports Authority (GPA), Environmental International Corporation (EIC) is submitting the First Semi-annual Progress Report for review by the Georgia Environmental Protection Division (EPD). This report was prepared as outlined in the July 27, 2012 “VIRP Application” prepared by EIC and approved by the EPD on November 2, 2012 under the Voluntary Remediation Program (VRP). This report provides a brief summary of site activities that took place during the period from November 2012 through April 2013.

Immediately after receiving EPD’s letter of approval, GPA prepared the necessary documents for authorization by its Board of Directors. After the board approved the Voluntary Investigation and Remediation Plan (VIRP) pathway and the required budget, GPA retained EIC to proceed with the implementation of the VIRP. Upon receipt of GPA’s notice to proceed dated February 21, 2013, EIC initiated project activities as outlined in the VIRP.

EIC first prepared an extended base map to include MW-19 to facilitate better horizontal delineation of the contaminants of concern (COC). Figure 1 illustrates the extended site map. EIC then prepared a site health and safety plan for performing field activities. The following sections provide a summary of the subsequent tasks completed at the site.

2 AFFIDAVIT

On March 28, 2012, GPA filed an affidavit of corrective action with the clerk of the Superior Court of Decatur County, Georgia in accordance with the terms specified in EPD's letter dated November 2, 2012. EIC forwarded a copy of the recorded affidavit to EPD on April 10, 2013. EIC's transmittal letter is included as Appendix A.

3 Quarterly Groundwater Monitoring

From March 25 to March 28, 2013, EIC conducted groundwater sampling and water level gauging of all available wells (a total of 22 wells) for Monitored Natural Attenuation (MNA) monitoring purposes. Groundwater samples were collected and analyzed to monitor pesticides constituents of concern (COCs) and selected inorganic constituents that are indicative of natural attenuation. Pesticide contamination analysis included the primary constituent of concern (COC) benzenehexachloride (BHC), consisting of isomers alpha-BHC, beta-BHC, delta-BHC, gamma-BHC, and other pesticides. The analytical laboratory transmitted a report on April 12, 2013. EIC is currently validating the analytical data and evaluating the results.

The analytical data along with potentiometric surface data and related field observations will be utilized in determining the prevailing site conditions relative to Risk Reduction Standards (RRS)/Delineation Criteria and to enable defining baseline conditions. EIC is currently evaluating the analytical results and is in the process of preparing a draft report to document key findings. EIC will submit the final report in the next Semi-annual Report.

4 Well Inventory

To evaluate the current status of monitoring wells, EIC conducted an inventory of well conditions at the Bainbridge Terminal during the March 2013 groundwater sampling event. The following subsections document EIC's findings.

4.1 Un-located Wells

EIC attempted to identify the location of three un-located wells, MW-2, MW-3, and MW-9 utilizing a magnetometer and visual observation. These wells are illustrated in Figure 1. EIC was successful in identifying the location of monitoring well MW-2 but was unable to locate the monitoring wells, MW-3 and MW-9. During the next trip to the site, EIC will utilize a licensed surveyor to identify locations of these wells and further attempt to locate these wells.

4.2 Well Conditions

During the first groundwater monitoring event, EIC also identified several issues with the integrity of certain monitoring wells at the site. These are summarized in Table 1. New bolts need to be installed on the flush-to-grade vaults of eight monitoring wells and new padlocks need to be installed on four monitoring wells with stick-up casing. New locking caps need to be installed on six monitoring wells, and the PVC well casing has been deformed and requires repair for two monitoring wells. New concrete pads need to be installed on two monitoring wells, while a third well requires re-alignment of the existing concrete pad. Monitoring well, MW-15 in particular may possibly have to be redeveloped, since the concrete pad and vault have been completely destroyed and silt from the ground surface may have filled a portion of the well screen. EIC will address well repairs and rehabilitation under subsequent tasks.

5 MONTHLY SUMMARY OF HOURS INVOICED

A monthly summary of hours invoiced for the aforementioned tasks during the period from February 2013 through April 2013 are summarized in Appendix B.

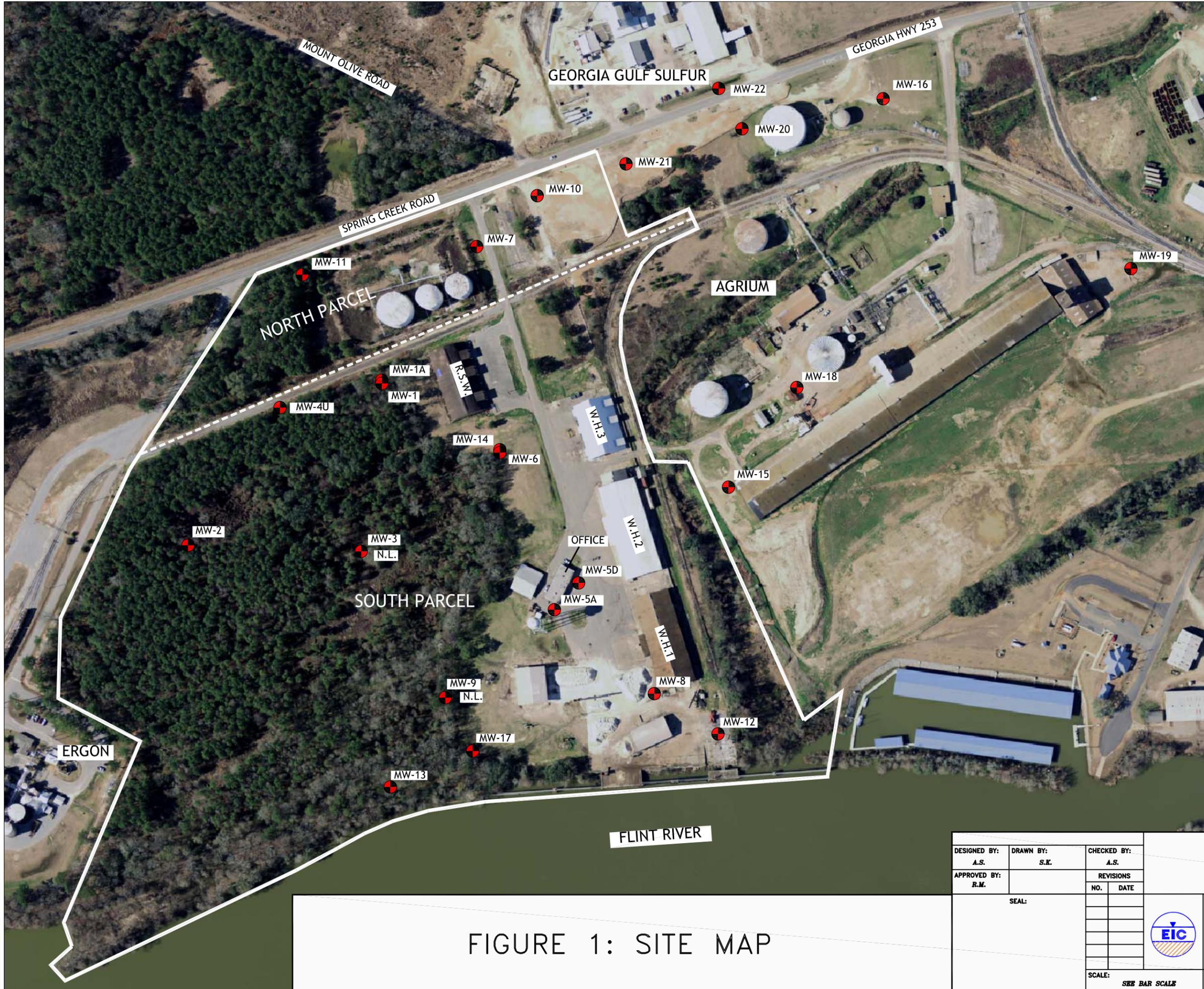
6 SUMMARY

Since the initiation of VIRP tasks in February 2013, EIC has completed initial tasks to meet the goals of the VIRP, as well as to follow EPD's direction. These tasks included filing an affidavit of corrective action, preparation of a health and safety plan, conducting a well inventory, conducting groundwater monitoring, and related tasks. A final report documenting the first quarterly groundwater monitoring report will be included in the next Semi-annual report.

Currently, EIC is evaluating the horizontal delineation of COCs, preparing to conduct a geographical survey of selected wells, and is evaluating newly available facility as-built drawings to update the site conceptual model. EIC's findings of these evaluations will be included in the next Semi-annual report. The next Semi-annual report will also include a response to EPD's VIRP comment letter dated November 2, 2012.

**Table 1: Well Conditions Status
GPA Bainbridge Terminal, Bainbridge, Georgia**

Well Identity	Well Condition	Recommended Action
MW-1	Stick-up well. No padlock for outer casing. Well locking cap in good condition, but is degraded and could not be tightened.	Install new locking cap and new padlock.
MW-1A	Stick-up well. No pad lock for outer casing.	Install new padlock.
MW-2	Stick-up well. Well casing and locking cap in good condition. No padlock for outer casing.	Install new padlock.
MW-3	Not Found.	Locate well utilizing licensed surveyor or install replacement well.
MW-4U	Stick-up well. Well casing and locking cap in good condition. EIC cut off the padlock from well as no key was available. No padlock for outer casing.	Install new padlock.
MW-5A	Flush-to-grade well. Good Condition.	None needed.
MW-5D	Flush-to-grade well. Concrete pad is damaged and heavily cracked. The entire well vault lid and top came off in one piece. Well locking cap damaged/destroyed and difficult to remove from the well casing. The well casing itself is in good condition.	Install new concrete pad and locking well cap.
MW-6	Flush-to-grade well. Missing one vault bolt. Well casing and locking cap appears to be in good condition.	Install new vault lid bolt.
MW-7	Flush-to-grade well. Good condition. Well locking cap is loose.	Replace locking well cap.
MW-8	Flush-to-grade well. Vault lid is missing all bolts and is rusted. Locking well cap and concrete pad is in good condition.	Install new vault lid bolts.
MW-9	Not Found.	Locate well utilizing licensed surveyor or install replacement well.
MW-10	Flush-to-grade well. Concrete pad has been apparently struck by a vehicle shifting it against well casing and breaking off part of the PVC well casing. However, well casing was apparently not moved.	Recenter and level concrete pad, cut off broken section of PVC casing, and install new bolt and locking well cap.
MW-11	Flush-to-grade well. Good Condition.	None needed.
MW-12	Flush-to-grade well. Good Condition.	None needed.
MW-13	Flush-to-grade well. Good Condition.	None needed.
MW-14	Flush-to-grade well. Missing two well vault bolts.	Install new bolts.
MW-15	Flush-to-grade well. Well concrete pad and vault have been destroyed. The 2-inch PVC casing extends approximately 1/2 inch above the ground surface and has been deformed. Locking well cap is missing. Grass and particles observed in well casing during groundwater sampling.	Install new concrete pad , cut, repair well casing, install new locking cap, and possibly redevelop well.
MW-16	Flush-to-grade well. Extremely difficult to replace well locking cap.	Replace locking well cap.
MW-17	Flush-to-grade well. No vault lid bolts. Well casing is bent.	Install new bolts and attempt to repair well casing.
MW-18	Flush-to-grade well. Missing all vault lid bolts.	Install new bolts.
MW-19	Flush-to-grade well. Missing all vault lid bolts.	Install new bolts.
MW-20	Flush-to-grade well. Concrete pad is slightly cracked, well locking cap and casing in good condition.	None needed.
MW-21	Flush-to-grade well. Missing one vault lid bolt.	Install new bolt.
MW-22	Flush-to-grade well. Good Condition	None needed.



- LEGEND:**
- MW-3 MONITORING WELL
 - N.L. WELL NOT LOCATED
 - GPA PROPERTY LINE
 - DIVISION SEPARATING NORTH AND SOUTH PARCELS
 - R.S.W. ROCK SALT WAREHOUSE
 - W.H.1 WAREHOUSE 1
 - W.H.2 WAREHOUSE 2
 - W.H.3 WAREHOUSE 3

SOURCE:
 BASEMAP MODIFIED FROM AERIAL PHOTOGRAPH PROVIDED BY GEORGIA PORTS AUTHORITY. PROPERTY LINES PROVIDED BY GEORGIA PORTS AUTHORITY. WELL LOCATIONS (APPROXIMATE) FROM CH2M HILL DRAFT CAP AND WELL LOG MW-22.

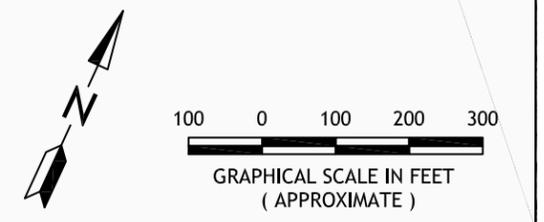


FIGURE 1: SITE MAP

DESIGNED BY: A.S.	DRAWN BY: S.K.	CHECKED BY: A.S.
APPROVED BY: R.M.	REVISIONS	
SEAL:		NO. DATE

**GEORGIA PORTS AUTHORITY
 BAINBRIDGE TERMINAL
 Bainbridge, Georgia**

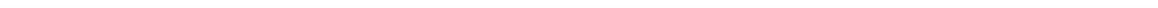


ENVIRONMENTAL INTERNATIONAL CORP.
 161 KIMBALL BRIDGE ROAD
 ALPHARETTA, GEORGIA 30009

SCALE: SEE BAR SCALE	DATE: 4/26/2013	FILE: 400007 - GPA BAINBRIDGE	SHEET NO.:
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MAY 2013
SEMI-ANNUAL REPORT

APPENDIX A





ENVIRONMENTAL INTERNATIONAL CORPORATION

161 Kimball Bridge Road, Suite 100, Alpharetta, GA 30009

Phone: 770-772-7100, Fax: 770-772-0555

Email: rajmahadevaiah@eicusa.com

Website: www.eicusa.com

Our Contribution to the Environment®

April 10, 2013

Dr. Montague McPherson
Environmental Specialist
Georgia Environmental Protection Division
Suite 1462 East Tower
2 Martin Luther King Jr. Drive, SE
Atlanta, Georgia 30334

**Subject: Affidavit of Corrective Action due to the presence of hazardous waste,
Voluntary Investigation and Remediation Plan, HSI Site No. 10071,
Georgia Ports Authority Bainbridge Terminal,
1321 Spring Creek Road, Bainbridge, Georgia**

Dear Dr. McPherson:

On behalf of Georgia Ports Authority (GPA), Environmental International Corporation (EIC) is pleased to submit the attached copy of the recorded affidavit for your files. Please note that the affidavit was filed with the clerk of the Superior Court of Decatur County, Georgia in accordance with the terms of the Voluntary Investigation and Remediation Plan (VIRP) approved by the Georgia Environmental Protection Division (EPD) in its letter dated November 2, 2012.

If you have any questions regarding this submittal, please contact Ms. Natalie Schanze of GPA at 912-963-5595 or me at 770-772-7100, Extn. 223.

Sincerely,

ENVIRONMENTAL INTERNATIONAL CORPORATION

Raj Mahadevaiah, P.E., C.G.W.P.
President & CEO

Cc: Natalie Schanze, GPA
Christopher Novack, GPA

STATE OF GEORGIA)
)
DECATUR COUNTY)

FILED IN OFFICE
2013 Mar 28 PM 03:39
CECILIA WILLIS
CLERK OF SUPERIOR COURT
DECATUR COUNTY, GEORGIA
2013-207 Deed Doc. A/F

Recorded 03/28/2013 03:39PM
Georgia Intangible Tax Paid: \$0.00
CECILIA WILLIS
Clerk Superior Court, DECATUR County, Ga.
Bk **00352** Pg **0452-0453**

IN RE: Bainbridge Terminal, Decatur County, Georgia
Deed Reference: Deed Book D-8, Page 358
Record Owner: Georgia Ports Authority

This recorded affidavit, in the Office of the Clerk of the Superior Court of Decatur County, Georgia, pursuant to O.C.G.A. 44-2-20, refers to that certain tract of land (hereinafter the "Property") owned by the Georgia Ports Authority, a public corporation and instrumentality of the State of Georgia, which Authority acquired its interest by Deed dated March 18, 1959 and a Deed of Correction dated June 15, 1964, from the State of Georgia, said Deed of Correction being recorded in Deed Book D-8, Page 358, Decatur County, Georgia.

Georgia Ports Authority is performing corrective action at the Bainbridge Terminal which is a qualifying property in accordance with an approved voluntary investigation and remediation plan (VIRP). EPD has designated the subject property as Class V as defined in Rule 391-3-19-.06 requiring corrective action as provided for in §12-B-107(b) of the Georgia Voluntary Remediation Program Act. This property has been listed on the State's Hazardous Site Inventory and has been designated as needing corrective action due to the presence of hazardous waste, hazardous constituents or hazardous substances regulated under State law. Interested parties should contact the

property owner or the Georgia Environmental Protection Division for further information concerning this property. This notice is provided in compliance with the Georgia Hazardous Site Response Act.

DECATUR COUNTY
BK 00352
Pg 0453

This 21st day of March, 2013.

GEORGIA PORTS AUTHORITY

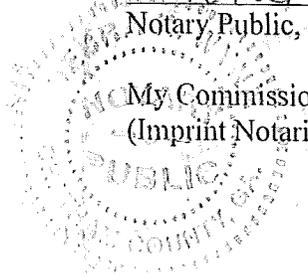
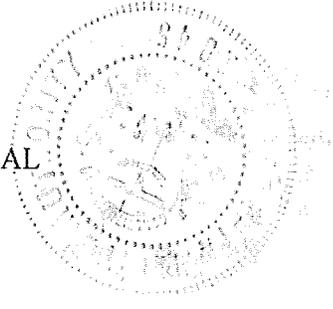
By: *Luca Toly*
Executive Director

Signed, sealed and delivered
in the presence of:

Ross Dodson
(Unofficial Witness)

Debra Wynne
Notary Public, State of Georgia

COPORATE SEAL



My Commission expires _____
(Imprint Notarial Seal) DEBRA H. WYNN
Notary Public, Chatham County, GA
My Commission Expires October 20, 2014

STATE OF GEORGIA)
)
DECATUR COUNTY)

IN RE: Bainbridge Terminal, Decatur County, Georgia
Deed Reference: Deed Book D-8, Page 358
Record Owner: Georgia Ports Authority

This recorded affidavit, in the Office of the Clerk of the Superior Court of Decatur County, Georgia, pursuant to O.C.G.A. 44-2-20, refers to that certain tract of land (hereinafter the "Property") owned by the Georgia Ports Authority, a public corporation and instrumentality of the State of Georgia, which Authority acquired its interest by Deed dated March 18, 1959 and a Deed of Correction dated June 15, 1964, from the State of Georgia, said Deed of Correction being recorded in Deed Book D-8, Page 358, Decatur County, Georgia.

Georgia Ports Authority is performing corrective action at the Bainbridge Terminal which is a qualifying property in accordance with an approved voluntary investigation and remediation plan (VIRP). EPD has designated the subject property as Class V as defined in Rule 391-3-19-.06 requiring corrective action as provided for in §12-B-107(b) of the Georgia Voluntary Remediation Program Act. This property has been listed on the State's Hazardous Site Inventory and has been designated as needing corrective action due to the presence of hazardous waste, hazardous constituents or hazardous substances regulated under State law. Interested parties should contact the

property owner or the Georgia Environmental Protection Division for further information concerning this property. This notice is provided in compliance with the Georgia Hazardous Site Response Act.

This 21st day of March, 2013.

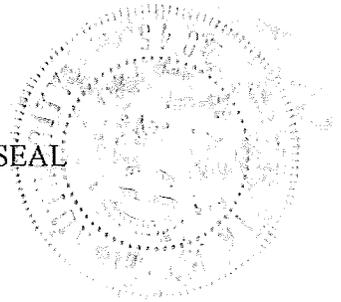
GEORGIA PORTS AUTHORITY

By: *Lucretia Fultz*
Executive Director

Signed, sealed and delivered
in the presence of:

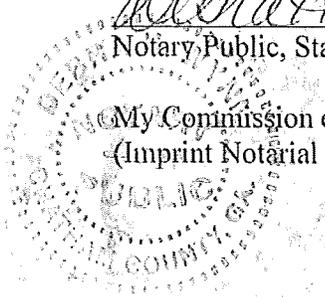
Rosie Dodwin
(Unofficial Witness)

COPORATE SEAL



Debra H. Wynn
Notary Public, State of Georgia

My Commission expires _____
(Imprint Notarial Seal) DEBRA H. WYNN
Notary Public, Chatham County, GA
My Commission Expires October 20, 2014



DECATUR
P.O. BOX 336
112 WEST WATER STREET
BAINBRIDGE, GEORGIA 39818

Receipt Number
149370
Date
03/28/2013
Reference Number

To: GEORGIA PORT AUTHORITY/KENNETH SLATER

Account Description	QTY	Each	Extended
AFF-AFFIDAVIT			\$14.00

Cash Paid: \$14.00 Check Paid: \$0.00 Check #: Total Paid \$14.00

MEMO:

MAY 2013
SEMI-ANNUAL REPORT

APPENDIX B



Environmental International Corporation

GPA VIRP

February through April 2013

TASKS	Feb 13	Mar 13	Apr 13	TOTAL
Planning & Preparation	16.25	43.75	15.25	75.25
Groundwater Sampling & Well Inventory	9.25	254.50	119.33	383.08
Health & Safety	0.00	61.75	0.50	62.25
Total, Hours	25.50	360.00	135.08	520.58