



Environmental  
Resources  
Management

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September 29, 2017

Mr. David Brownlee  
Unit Coordinator  
Response and Remediation Program  
Georgia Department of Natural Resources  
2 Martin Luther King Jr. Drive, SE, Suite 1054 East  
Atlanta, Georgia 30334

**Re: 2017 Annual CAMP Inspection Report  
Atlanta Gas Light Company  
Former Manufactured Gas Plant Site  
Rome, Georgia**

Dear Mr. Brownlee:

Attached please find the Annual Continuing Action Monitoring Plan (CAMP) Inspection for the Atlanta Gas Light Company (AGLC) Former Manufactured Gas Plant (MGP) site located 200 West 1st Street, Rome, Georgia (Site). This survey was completed in accordance with the *Continuing Action Monitoring Plan* dated August 2014 prepared by Burns & McDonnell. Pertinent Site features and the Type 4 and 5 areas included in the CAMP Inspection as shown on Figure 1 (attached). Please note that the wells indicated on Figure 1 were properly abandoned in 2015. Site conditions as observed in the August 2017 survey for the Type 5 and Type 4 parcels are summarized in Tables 1 and 2, respectively. Photographic documentation of Site conditions is included as an attachment.

All information included within this CAMP Inspection Report is based on a visual inspection of the Site conducted on August 18, 2017. No action is required at this time based on the survey. The right-of-way (ROW) beneath the 2<sup>nd</sup> Avenue Bridge had some bare soil but no signs of erosion as cobbles placed in the area appear to be providing sufficient cover. AGLC will continue monitoring for signs of erosion.

AGLC has continued monthly rainfall monitoring for 10-year, 24-hour rainfall events that might trigger the need for a river survey monitoring event. No qualifying rainfall event occurred during the last year of monitoring, September 1, 2016 through August 31, 2017.

Mr. David Brownlee  
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The last river bottom monitoring survey event was performed on August 2, 2016. In the absence of a significant rainfall event, the next river bottom monitoring survey event will be performed in August 2021.

Should you have any questions or comments, please do not hesitate to contact me (email: [nic.vrey@erm.com](mailto:nic.vrey@erm.com) or phone: 678-486-2700) or Greg Corbett (email: [gcorbett@southernco.com](mailto:gcorbett@southernco.com) or phone: 404.584.3719).

Sincerely,



Nic Vrey  
Project Manager

cc: Greg Corbett, P.E., AGLC  
Christie Battenhouse, P.G. AGLC

Attachments:

- Figure
- Photographic Log
- Tables



- NOTES:**
- MW-506 Monitoring well paved over by City of Rome
  - Wells designed without the letters "B" or "C" or with an "A" are Shallow Monitoring Wells (e.g. MW-406A, MW-404R, MW-503)
  - Wells designed with the letter "B" are Intermediate Monitoring Wells (e.g. MW-406B)
  - Wells designed with the letter "C" are Deep Monitoring Wells (e.g. MW-406C)
  - "Voluntary Remediation Program (VRP) Standards" refers to those properties that are in compliance with risk-based clean-up goals developed as part of the VRP remediation plan.



**FIGURE 1**  
**VRP STANDARDS AND TYPE 5 AREAS**  
**ROME FORMER MGP SITE**  
**WEST 1ST STREET**  
**ROME, GEORGIA**



# PHOTOGRAPHIC LOG

**Client Name:** AGLC

**Site Location:** Rome, Georgia

**Project No.** 0387172

**Photo No.**  
**1**      **Date:**  
8/18/2017

**Direction Photo Taken:**

Facing NE

**Description:**

West 1<sup>st</sup> Street and Right-of-Way.

New pavement where Type 5 Marker was installed. MW-507 abandoned in place

Good ground cover, no erosion

No disturbed asphalt



**Photo No.**  
**2**      **Date:**  
8/18/2017

**Direction Photo Taken:**

Facing SW

**Description:**

Bronze Type 5 Marker installed July 2015

Marker in good condition





# PHOTOGRAPHIC LOG

**Client Name:** AGLC

**Site Location:** Rome, Georgia

**Project No.** 0387172

**Photo No.**  
**3**

**Date:**  
8/18/2017

**Direction Photo Taken:**

Facing NE

**Description:**

Parcel 1 along West 1<sup>st</sup> Street

Parcel used as a parking lot

No groundwater use

No erosion concerns



**Photo No.**  
**4**

**Date:**  
8/18/2017

**Direction Photo Taken:**

Facing NW

**Description:**

Parcel 1 adjacent to Parcel 7

Parcel used as a parking lot

No groundwater use

Good grass cover - no erosion concerns





## PHOTOGRAPHIC LOG

Client Name: AGLC

Site Location: Rome, Georgia

Project No. 0387172

Photo No.  
**5**

Date:  
8/18/2017

Direction Photo  
Taken:

Facing West

Description:

Parcel 2 between  
riverbank and walking  
trail

No groundwater use

Good vegetation cover -  
no erosion concerns



Photo No.  
**6**

Date:  
8/18/2017

Direction Photo  
Taken:

Facing South

Description:

Parcel 2 – Parking Lot

No groundwater use


Good grass/mulch  
cover on edge of  
parking lot - no erosion  
concerns






# PHOTOGRAPHIC LOG

<b>Client Name:</b> AGLC	<b>Site Location:</b> Rome, Georgia	<b>Project No.</b> 0387172
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<b>Photo No.</b> 7	<b>Date:</b> 8/18/2017	
<b>Direction Photo Taken:</b>  Facing SE		
<b>Description:</b>  Parcel 3 – Parking Lot  No groundwater use  Asphalt cover – no erosion concerns		

<b>Photo No.</b> 8	<b>Date:</b> 8/18/2017	
<b>Direction Photo Taken:</b>  Facing SW		
<b>Description:</b>  Parcel 3A – Grass embankment north of parking lot  No groundwater use  Good grass cover - no erosion concerns		



# PHOTOGRAPHIC LOG

**Client Name:** AGLC

**Site Location:** Rome, Georgia

**Project No.** 0387172

**Photo No.**  
**9**

**Date:**  
8/18/2017

**Direction Photo Taken:**

Facing NW

**Description:**

Parcel 4 – Hawthorne Suites Parking Lot

No groundwater use

Asphalt cover – no erosion concerns



**Photo No.**  
**10**

**Date:**  
8/18/2017

**Direction Photo Taken:**

Facing NW

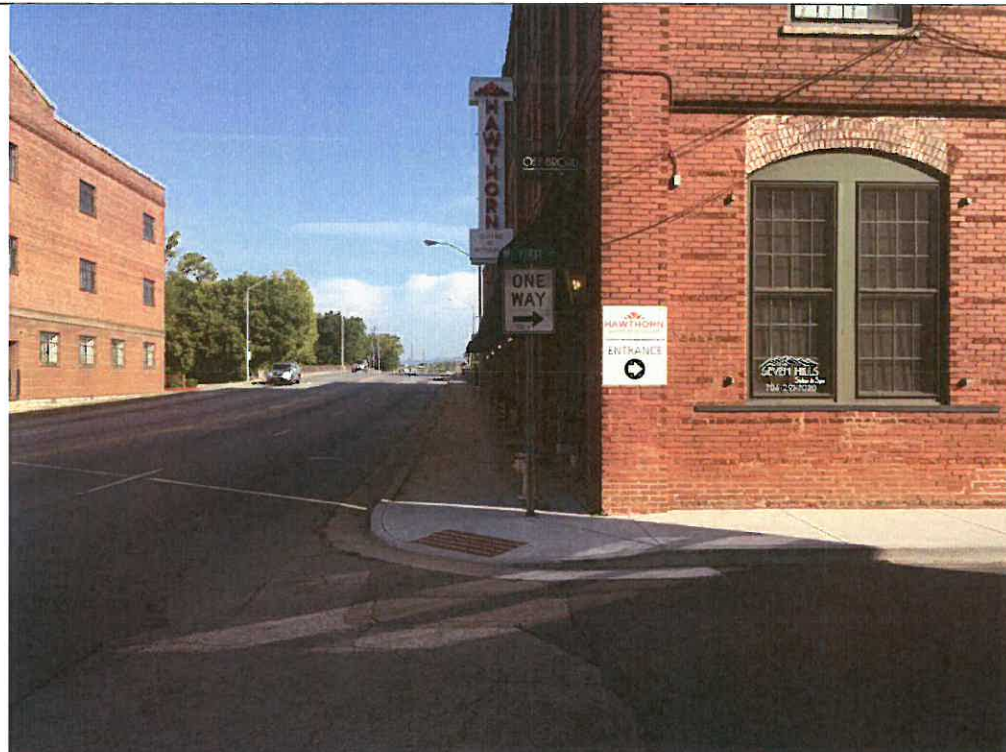
**Description:**

Parcel 5 – Hawthorne Suites Hotel

Retail space on ground floor

No groundwater use

No erosion concerns







# PHOTOGRAPHIC LOG

**Client Name:** AGLC

**Site Location:** Rome, Georgia

**Project No.** 0387172

**Photo No.**  
**11**

**Date:**  
8/18/2017

**Direction Photo Taken:**

Facing NE

**Description:**

Parcel 6 – NW of Hawthorne Suites

No groundwater use

Good grass cover - no erosion concerns



**Photo No.**  
**12**

**Date:**  
8/18/2017

**Direction Photo Taken:**

Facing East

**Description:**

Parcel 7 – Parking Lot

No groundwater use

Asphalt cover – no erosion concerns





## PHOTOGRAPHIC LOG

Client Name: AGLC

Site Location: Rome, Georgia

Project No. 0387172

Photo No.  
**13**

Date:  
8/18/2017

Direction Photo  
Taken:

Facing NW

Description:

Parcel 8 –wooden  
building used as hotel  
space

Not in residential use

No groundwater use



Photo No.  
**14**

Date:  
8/18/2017

Direction Photo  
Taken:

Facing East

Description:

ROW under 2<sup>nd</sup> Ave  
Bridge

No visible signs of  
erosion – some bare  
soil but rock cover  
appears to be  
preventing any erosion

Continue to monitor for  
signs of erosion



Table 1  
 Annual Monitoring Form Type 5 Property (Portions of West 1st Street and its ROW) Institutional and  
 Engineering Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MN	IA	
<b>TYPE 5 INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Land Disturbing Activities	X			No land disturbing activities taking place
New Utility Installations	X			No new utility installations observed
Non-Residential Restrictions	X			
Permanent Marker(s)	X			Permanent marker installed in ROW (see photo log)
Other				
<b>TYPE 5 ENGINEERING CONTROLS</b>				
Asphalt Cover (Condition, Disturbed)	X			
Functionally Equivalent Controls in-Place	X			
Other				
Monitoring Performed By: Aubrey Ellis				
			Date: August 18, 2017	
Condition <sup>1</sup> : NA, no action needed; MN, maintenance needed; IA, immediate action needed				

Table 2

Annual Monitoring Form  
 VRP Standards Properties (Parcel 1) Institutional Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MN	IA	
<b>VRP STANDARDS INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Residential Use Requirements/Barriers	X			
Erosion	X			
Other				
Monitoring Performed By: Aubrey Ellis				
Date: August 18, 2017				
Condition <sup>1</sup> : NA, no action needed; MN, maintenance needed; IA, immediate action needed				

Table 2

Annual Monitoring Form  
 VRP Standards Properties (Parcel 2) Institutional Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MN	IA	
<b>VRP STANDARDS INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Residential Use Requirements/Barriers	X			
Erosion	X			
Other				
<b>Monitoring Performed By: Aubrey Ellis</b>				
				Date: August 18, 2017
Condition <sup>1</sup> : NA, no action needed; MN, maintenance needed; IA, immediate action needed				

Table 2

Annual Monitoring Form  
 VRP Standards Properties (Parcel 3) Institutional Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MN	IA	
<b>VRP STANDARDS INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Residential Use Requirements/Barriers	X			
Erosion	X			
Other				
<b>Monitoring Performed By: Aubrey Ellis</b>				
				Date: August 18, 2017
Condition <sup>1</sup> : NA, no action needed; MN, maintenance needed; IA, immediate action needed				

Table 2

Annual Monitoring Form  
 VRP Standards Properties (Parcel 3A) Institutional Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MIN	IA	
<b>VRP STANDARDS INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Residential Use Requirements/Barriers	X			
Erosion	X			
Other				
<b>Monitoring Performed By: Aubrey Ellis</b>				
			Date: August 18, 2017	
<b>Condition<sup>1</sup>: NA, no action needed; MIN, maintenance needed; IA, immediate action needed</b>				

Table 2

Annual Monitoring Form  
 VRP Standards Properties (Parcel 4) Institutional Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MIN	IA	
<b>VRP STANDARDS INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Residential Use Requirements/Barriers	X			
Erosion	X			
Other				
<b>Monitoring Performed By: Aubrey Ellis</b>				
				Date: August 18, 2017
Condition <sup>1</sup> : NA, no action needed; MIN, maintenance needed; IA, immediate action needed				



Table 2

Annual Monitoring Form  
 VRP Standards Properties (Parcel 5) Institutional Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MIN	IA	
<b>VRP STANDARDS INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Residential Use Requirements/Barriers	X			
Erosion	X			
Other				
<b>Monitoring Performed By: Aubrey Ellis</b>				
				Date: August 18, 2017
Condition <sup>1</sup> : NA, no action needed; MIN, maintenance needed; IA, immediate action needed				

Table 2

Annual Monitoring Form  
 VRP Standards Properties (Parcel 6) Institutional Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MIN	IA	
<b>VRP STANDARDS INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Residential Use Requirements/Barriers	X			
Erosion	X			
Other				
<b>Monitoring Performed By: Aubrey Ellis</b>				
				Date: August 18, 2017
Condition <sup>1</sup> : NA, no action needed; MIN, maintenance needed; IA, immediate action needed				

Table 2  
 Annual Monitoring Form  
 VRP Standards Properties (Parcel 7) Institutional Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MIN	IA	
<b>VRP STANDARDS INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Residential Use Requirements/Barriers	X			
Erosion	X			
Other				
<b>Monitoring Performed By: Aubrey Ellis</b>				
			Date: August 18, 2017	
<b>Condition<sup>1</sup>: NA, no action needed; MIN, maintenance needed; IA, immediate action needed</b>				

Table 2  
 Annual Monitoring Form  
 VRP Standards Properties (Parcel 8) Institutional Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MIN	IA	
<b>VRP STANDARDS INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Residential Use Requirements/Barriers	X			
Erosion	X			
Other				
<b>Monitoring Performed By: Aubrey Ellis</b>				
			Date: August 18, 2017	
Condition <sup>1</sup> : NA, no action needed; MIN, maintenance needed; IA, immediate action needed				

Table 2  
 Annual Monitoring Form  
 VRP Standards Properties (ROW under 2nd Ave. Bridge) Institutional Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MN	IA	
<b>VRP STANDARDS INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Residential Use Requirements/Barriers	X			
Erosion	X			No visible erosion, some bare soil, continue to monitor
Other				
<b>Monitoring Performed By: Aubrey Ellis</b>				
				Date: August 18, 2017
Condition <sup>1</sup> : NA, no action needed; MN, maintenance needed; IA, immediate action needed				

Table 2  
 Annual Monitoring Form  
 VRP Standards Properties (West 1st St. and ROW) Institutional Controls  
 Atlanta Gas Light Company  
 Former Manufactured Gas Plant Site  
 Rome, Georgia

MONITORING ITEM	CONDITION <sup>1</sup>			COMMENTS
	NA	MN	IA	
<b>VRP STANDARDS INSTITUTIONAL CONTROLS</b>				
Groundwater Restriction	X			No extraction of groundwater occurring
Residential Use Requirements/Barriers	X			
Erosion	X			
Other				
<b>Monitoring Performed By: Aubrey Ellis</b>				
				Date: August 18, 2017
Condition <sup>1</sup> : NA, no action needed; MN, maintenance needed; IA, immediate action needed				