

**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

December 3, 2014

**VIA EMAIL & REGULAR MAIL**

**FILE COPY**

Atlanta Gas Light Company  
c/o Mr. Greg Corbett, Director of Environment & Sustainability  
Ten Peachtree Place  
Atlanta, Georgia 30309

Re: August 2014 Voluntary Remediation Program Application  
Augusta MGP Site, HSI Site No. 10132  
August, Richmond County, Georgia

Dear Mr. Corbett:

The Georgia Environmental Protection Division (EPD) has received the August 28, 2014, Voluntary Investigation and Remediation Plan (VIRP) that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. EPD acknowledges that this VIRP was submitted in accordance with the EPD Consent Order EPD-VRP-11. EPD is approving your VIRP, which specifies corrective action consisting of the following Remedial Action Objectives:

- Conduct additional soil boring investigation activities to characterize the extent of source material in the saturated zone above the saprolite, and remediate remaining source material above the saprolite to the extent practicable through excavation and in-situ stabilization (ISS).
- Develop groundwater cleanup criteria/goals and control strategies for the Site, which will include reducing the extent of dissolved phase constituents of interest (COIs) in groundwater above applicable VRP cleanup standards and meeting the applicable drinking water criteria for site COIs in groundwater at the hypothetical point of exposure (POE).
- Conduct routine groundwater monitoring on a semi-annual basis for three years to verify effectiveness and sustainability of the ISS remedy and semiannually thereafter throughout the duration of the VIRP.
- Conduct additional investigation activities to characterize the dissolved phase TCE impacts within the onsite and offsite groundwater.

Therefore, EPD is accepting Atlanta Gas Light Company (AGLC) as a participant as defined in the Act for the following qualifying properties provided AGLC implements the VIRP in compliance with the following schedule and conditions:

Qualifying properties:

Atlanta Gas Light Company August MGP Site

Owner: Atlanta Gas Light Company

Main Site Property: Intersection of Walton Way & 8<sup>th</sup> Street

Augusta, Richmond County, Georgia 30901

Qualifying Property Tax Parcel ID #s: 046-4-185-00-0, 047-3-108-00-0, 047-3-109-00-0, 046-4-186-00-0, 046-4-187-00-0, 046-4-188-00-0, 046-4-189-00-0, 047-3-225-00-0, 047-3-227-00-0, 047-3-228-

00-0, 047-3-231-00-0, 047-3-248-00-0, 047-3-327-01-0, 047-3-327-02-0, 047-3-328-00-0, 047-3-327-00-0, 047-3-330-00-0, 047-3-374-01-0.

### Schedule

- Semiannual progress reports are to be submitted to EPD. Each progress report must describe all actions taken since the last submittal, and include certification by the professional engineer/geologist specified in the VIRP along with a monthly summary of hours invoiced and description of services provided since the last submittal.
- The reporting schedule will be December 1<sup>st</sup> and June 1<sup>st</sup> annually, beginning in 2015 and ending in 2020, unless a compliance status report (CSR) is submitted and approved prior to 2020.
- A CSR including certifications should be submitted by June 1, 2020.

In addition to the reporting schedule specified above, the following must be included in the December 1, 2017, progress report:

- Demonstration of complete horizontal and vertical delineation, finalize the remediation plan and provide a cost estimate for implementation of remediation and associated continuing actions. EPD recommends that the participant finalize approval of cleanup standards, if applicable, for all regulated substances prior to this submittal.

Within six months of detecting regulated substance(s) on a non-qualifying property, the participant must apply to EPD to include the affected property as a qualifying property under the Act or notify EPD that the non-qualifying property is not included under the Act.

Since AGLC is performing corrective action at the qualifying property in accordance with an approved VIRP, the qualifying property will be reclassified from Class IV to Class V and designated as needing corrective action as provided for in §12-8-107(b) of the Act. Within 45 days of this letter, you are required to file an affidavit, if not previously filed, stating that your 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 wastes, hazardous constituents, or hazardous substances regulated under state law. This affidavit is to be filed with the clerk of the Superior Court of Richmond County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20.

AGLC must also place the following notice, or revise previous notices recorded pursuant to the Georgia Hazardous Site Response Rules, Chapter 391-3-19, in any deed, mortgage, deed to secure debt, lease, rental agreement or other instrument given or caused to be given by the property owner which creates an interest in or grants a use of the property:

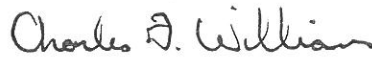
"This property has been listed on the state's hazardous site inventory and has been designated as needing corrective action due to the presence of hazardous wastes, hazardous constituents, or hazardous substances regulated under state law. Contact the property owner or the Georgia Environmental Protection Division for further information concerning this property. This notice is provided in compliance with the Georgia Hazardous Site Response Act and the Voluntary Remediation Program Act."

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Within 30 days of recording the affidavit or revised affidavit, please send a copy of the receipt of the recorded affidavit to the Response and Remediation Program, Georgia Environmental Protection Division, 2 Martin Luther King Jr. Drive, SE, Suite 1054 East, Atlanta, GA 30334.

EPD requires that AGLC and the professional engineer/geologist specified in the VRP application oversee the implementation of the VRP application in accordance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by AGLC. Failure of EPD to respond to a submittal within any timeframe does not relieve AGLC from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should AGLC fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program. Should you have any question or concerns regarding this site, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



Charles D. Williams  
Program Manager  
Response and Remediation Program

cc: Carol Geiger, KMCL  
File: VRP – Former Augusta MGP Site #10132

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