



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
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April 27, 2017

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

VIA FIRST-CLASS MAIL AND EMAIL

Re: Comments on VRP Semiannual Reports 3 and 4, Semiannual Corrective Action Effectiveness Reports 19 and 20, and Three Additional Qualifying Properties
Atlanta Gas Light Company - Augusta MGP Site, HSI Site Number 10132
Augusta, Georgia; Richmond County

Dear Mr. Corbett:

The Georgia Environmental Protection Division (EPD) is in receipt of VRP Semiannual Progress Reports 3 and 4, dated June 1, 2016, and December 1, 2016, respectively, for the Augusta MGP Site. We note that a Semiannual Corrective Action Effectiveness Report (CAER) was included in the appendices of each VRP report. EPD is also in receipt of documentation associated with two additional qualifying properties, 805 and 807 King Street, received by EPD on February 9, 2017; and with one additional qualifying property, 814 8th Street, received by EPD on February 16, 2017. All of the preceding documents were submitted to EPD pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100. Our comments are provided below.

1. According to the Vapor Intrusion Risk Evaluation in Appendix E of VRP Report 3, concentrations of benzene, ethylbenzene, toluene, xylenes, naphthalene, and trichloroethene in groundwater on site pose a risk of harmful vapor intrusion into future overlying residential buildings. EPD ran the Johnson & Ettinger vapor intrusion advanced groundwater model using historical groundwater-contaminant data collected on site; the resulting calculations indicate a risk of harmful vapor intrusion into commercial buildings also. Prior to removal of Augusta MGP from the Hazardous Site Inventory, property covenants will need to be in place, or existing covenants modified, to include vapor-intrusion mitigation for newly constructed buildings, both residential and commercial, where applicable.
2. Regarding the proposed wells to be abandoned, as indicated on Figure 2-4 in VRP Report 4:
 - a. EPD questions why MW-502D is scheduled for abandonment. MW-502D lies outside the proposed ISS area within Block A. Because MW-502D has a history of DNAPL, that well could be useful for monitoring the effectiveness of the ISS remedy, and possibly for tracking DNAPL occurrence and migration.
 - b. Other than as indicated in Comment 2a above, EPD approves the proposed well abandonments.
 - c. To expedite EPD review of future reports, particularly with regard to delineation requirements, please continue to include all abandoned wells on historical groundwater analytical-data tables, and continue to depict abandoned well locations on site plats.

3. Given the difficulties of implementing remedial activities in the southeast quadrant of the Fenwick Street & 9th Street intersection due to subsurface obstructions, the Type 5 RRS area proposed on Figure 3-1 in VRP Report 4 is acceptable to EPD.
4. EPD notes that all existing groundwater-monitoring wells on Block D have been abandoned to accommodate the Fenwick Substation expansion. Given that groundwater quality on that block has been impacted by the former Augusta MGP, please inform EPD as to what additional assessment and remedial actions are planned for that part of the site.
5. Groundwater velocities, or seepage velocities (V_s), as presented in Appendix C of CAER 20, were apparently calculated using total porosity (n) of the aquifer media. Effective porosity (n_e) (i.e., the volume of the media consisting of interconnected pore spaces) should be used to calculate V_s . In practice, n_e will almost always be less than n .
6. Please submit a copy of each court-recorded covenant associated with this site; EPD is in the process of updating its covenant database. If time constraints prevent inclusion of the recorded covenants in the June 2017 VRP semiannual report, please provide them as a single separate submittal by September 1, 2017.
7. EPD has received a submittal dated February 8, 2017, in which 805 King Street and 807 King Street are added to the Augusta MGP Site as additional qualifying properties under the VRP. EPD has also received a submittal dated February 15, 2017, in which 814 8th Street is added to the Augusta MGP Site as an additional qualifying property. Having reviewed both submittals, EPD accepts 805 King Street (tax parcel 047-3-237-00-0), 807 King Street (tax parcel 047-3-236-00-0), and 814 8th Street (tax parcel 047-3-229-00-0) as additional qualifying properties associated with the Augusta MGP Site under the VRP.
8. During the February 27, 2017, meeting between AGL and EPD, AGL stated that it was seeking a certificate of approval to raze the Trinity AME church located on Block E, whereas a local community group had expressed interest in moving the church. In future reports, please keep EPD apprised as to the status of ongoing negotiations regarding the church.

Atlanta Gas Light Company 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 Atlanta Gas Light Company. However, failure of EPD to respond to a submittal within any timeframe does not relieve Atlanta Gas Light Company from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-3935.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c (via email): Christie Battenhouse, Atlanta Gas Light Company
David Price, AMEC Foster Wheeler
Gregory Wrenn, AMEC Foster Wheeler