



April 19, 2017

**VIA EMAIL & REGULAR MAIL**

Epic Midstream, LLC – North Terminal (Formerly Axeon Specialty Products)  
c/o Linda Ferguson, Director of Compliance  
3225 Hawkinsville Road  
Macon, Georgia 31216

Re: 1<sup>st</sup> and 2<sup>nd</sup> Semi-Annual VRP Progress Reports (June 1, 2016 and November 30, 2016)  
Site Investigation Summary Report No. 2 (December 15, 2015)  
Epic Midstream – North Terminal (Formerly Axeon Specialty Products), VRP # 1440101197  
7 Foundation Drive, Savannah, Chatham County, Georgia

Dear Ms. Ferguson:

The Georgia Environmental Protection Division (EPD) has reviewed the above-referenced documents prepared by GHD for the Epic Midstream – North Terminal Site. After completing a review of these documents, EPD has the following comments which should be addressed in accordance with the Voluntary Remediation Program Act (the Act):

1. Comment #1 of EPD's VRP Approval letter dated November 24, 2015 requested the initiation of the proposed LNAPL recovery approach presented in the October 2015 Langan Technical Memorandum Report, which specified the use of a Multi-Phase Extraction (MPE) system, mobile skimmer pumps, and a mobile vacuum truck. In addition, during the March 16, 2016 meeting between EPD, Epic Midstream, and GHD, EPD discussed the five-year in-depth remediation plan that was submitted with the VRP Application that had been approved by EPD, which included the use of the above-mentioned remediation technologies.

EPD concurs with the plan to further assess the transmissivity values throughout the site prior to implementing a full-scale remedial approach. However, please ensure that the final remediation plan that is to be submitted in May 2018 in accordance with the approved VRP schedule is designed such that it addresses the elevated LNAPL thicknesses that continue to be observed site-wide and meets the remedial action goal of less than 0.1 feet of LNAPL by the conclusion of the 5-year VRP timeframe. Based on the current vertical and horizontal extent of LNAPL at the site, EPD recommends that EPIC and GHD consider utilizing additional remedial technologies in the interim, such as the originally proposed mobile vacuum truck events in select areas, to enhance ongoing remedial efforts leading up to the implementation of the final corrective action. LNAPL gauging and extraction should continue in wells where LNAPL thickness levels remain at or above 0.1 feet to the extent practicable in accordance with Section 12-8-108(8) of the Act, rather than continue with the proposed "no further LNAPL recovery" that has been proposed in Section 2.3.3 of the November 2016 VRP Progress Report.

2. According to Comment #3 of EPD's VRP Approval letter, additional soil characterization was warranted at the site to ensure there is no ongoing source of the LNAPL contamination. EPD acknowledges that a limited amount of soil sampling has been completed throughout the site, documented in both the June

2016 VRP Progress Report and the December 15, 2015 Site Investigation Summary Report No. 2. While the results of these soil samples were below Type 3 risk reduction standards (RRS) values and will contribute to the updated conceptual site model (CSM) for the site, it is worth noting that the current soil data has not identified a clear point of release or impact to soil in relation to the widespread LNAPL that exists within the subsurface. EPD requests that the next semi-annual progress report include a soil sampling plan with proposed sampling locations in the areas onsite that may need further soil assessment and characterization for the purpose of identifying impacted soil and/or source material related to the potential LNAPL point(s) of release.

3. EPD acknowledges the data collected from the November 6, 2015 Synthetic Precipitation Leaching Procedure (SPLP) soil sampling conducted by Terracon at TM-2 and TW-11, which reported MEK below the laboratory reporting limit and was found to be in compliance with the Type 3 RRS. Although no exceedances of MEK were reported in the two (2) soil samples collected, EPD recommends including MEK analysis on the next soil sampling event due to the low number of sampling locations investigated and analyzed for MEK during the November 2015 sampling event.
4. Table 3 of the November 2016 VRP Progress Report excludes a Type 3 RRS for chromium. Using the RRS criteria for soil presented in the December 2015 Site Investigation Summary Report No. 2 and as documented in Appendix III, Table 2 of Rule 391-3-19-.07(6)(c), the Type 3 soil RRS for chromium is 100 mg/kg. Please include this RRS value on all future applicable tables.
5. EPD agrees with Section 2.4 of the November 2016 VRP Progress Report, Section 3 of the June 2016 VRP Progress Report, and Section 6.3 of the December 2015 Site Investigation Summary Report No. 2, which proposes vapor intrusion screening to determine if soil vapor presents a potential risk to occupants in on-site buildings. The EPA Vapor Intrusion Screening Level (VISL) Calculator is recommended as the initial screening tool for evaluating vapor intrusion potential. Should further assessment of the vapor intrusion potential be required, please provide a soil gas sampling plan and proposed locations in the next semi-annual progress report. In addition, please also collect a groundwater sample from AW-38 and present the analytical data in the next semi-annual progress report.
6. Section 2.3.1 of the November 2016 VRP Progress Report describes a more viscous LNAPL that was detected at AW-13, and was therefore not included within the skimmer pump network. Please include a plan to further characterize the LNAPL from AW-13, and if it is characteristically different from the LNAPL throughout the rest of the site please also include any necessary modifications to the remedial action plan to account for this separate source material.
7. EPD understands that well AW-74 is located within the driving route of trucks near the loading dock; however, please make all reasonable efforts to monitor AW-74 during periods of optimal accessibility.
8. The June and November 2016 VRP Progress Reports stated that the Conceptual Site Model (CSM) will be updated following the completion of the LNAPL transmissivity evaluation. Please include an anticipated timeline for the completion of the LNAPL transmissivity evaluation.

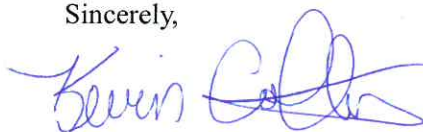
EPD requires that Epic Midstream, LLC and the professional engineer/geologist specified in the VRP oversee the implementation of the VRP in accordance with the provisions, purposes, standards, and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Epic Midstream, LLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve Epic Midstream, LLC from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Epic

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Midstream, LLC fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program.

EPD anticipates receipt of the next semi-annual progress report by June 1, 2017. Should you have any questions or concerns regarding this site, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 657-8610.

Sincerely,



Kevin Collins  
Unit Coordinator  
Response and Remediation Program

cc: John DiZinno, GHD (via email)

File: Epic Midstream (Formerly Axeon Specialty Products), 242-0321