

September 10, 2018

VIA EMAIL & REGULAR MAIL

McKenzie Tank Lines, Inc.
c/o Mr. Jim Schaeffer
1966 Commonwealth Lane
Tallahassee, Florida 32303

Re: 8th VRP Progress Report
Well Network Modification
McKenzie Tank Lines Site, HSI# 10406
Port Wentworth, Chatham County, Georgia
Tax Parcel ID #s 1-0729-01-007 & 1-0729-01-009

Dear Mr. Schaeffer:

The Georgia Environmental Protection Division (EPD) has received the May 18, 2018 Voluntary Remediation Program (VRP) Progress Report 8 submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) by the Environmental International Corporation (EIC) on behalf of McKenzie Tank Lines (MTL). Additionally, EPD has received the Well Network Modification outline submitted via email on June 26, 2018. After completing review of the referenced reports, EPD has prepared the following comments:

- 1) As stated in Section 3.4.1, MW-2S has historically exhibited anomalous groundwater elevations, and was therefore omitted from the data set in potentiometric surface contour construction. EPD concurs with the explanation that this anomalous measurement may be due to a localized perched aquifer. However, please explain the reasoning for the omission of wells RW-8, MW-35 and MW-53D in construction of the deep potentiometric surface contours.
- 2) EPD does not concur with the discussion in Section 3.4.4 stating that vertical delineation of the plume is complete. While deep monitoring well MW-35 may have been historically below delineation criteria, RW-8 and MW-53D, which are located along the leading edge of the plume still exhibit concentrations of vinyl chloride above the delineation standard of 2 ug/L. Please continue with the scheduled groundwater monitoring to observe whether constituents in wells RW-8 and MW-53D will attenuate to levels below delineation criteria.
- 3) Following excavation activities for source removal in AOC-4, results of confirmation sampling demonstrated tetrachloroethene (PCE) concentrations above the applicable RRS of 500 ug/kg in sample AOC4-5. EPD concurs with EIC's additional excavation of impacted soil and confirmation sampling near AOC4-5 during soil/sediment delineation and source removal activities for AOC-6 as discussed in Section 4.4.
- 4) Figure 4-5 indicates that the soil analytical data shown on the figure is from January and March 2015; however, these dates appear to be incorrect. According to the narrative and laboratory

analytical results, it appears that confirmation soil sampling in AOC-3 and AOC-4 occurred during March 2018. Please provide correct sample dates on figures upon submittal of the next semi-annual report.

- 5) EPD understands that the Georgia Ports Authority (GPA) is redeveloping the site over the summer 2018, which will affect the monitoring and recovery well network, paved areas, site grade, and stormwater drainage structures. EPD has previously expressed concern over the potential introduction of contaminants to the stormwater ditches on site through impacted soil, sediment and groundwater in AOC-6. Following excavation of AOC-6 and site redevelopment activities, EIC has indicated that surface water sampling of the stormwater ditches near AOC-6 will coincide with future groundwater sampling activities. In addition to future surface water sampling activities, EPD concurs with EIC's plans to investigate arsenic in groundwater near the former well MW-13S.
- 6) EPD concurs with the well network modification which includes the abandonment, replacement and installation of select wells. Please adhere to EPA Region 4 SESD guidance documents for installing and abandoning monitoring wells.

The above listed comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Please provide responses to the above listed comments as part of the next scheduled Progress Report submittal on November 20, 2018. Should you have any additional questions or concerns please contact Ms. Nicole Vermillion of the Response and Remediation Program at (404) 232-7891.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

c: Thomas F. Panebianco, McKenzie Tank Lines (email only)
Christopher Novack, Georgia Ports Authority (email only)
Raj Mahadevaiah, Environmental International Corporation (email only)

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