

February 26, 2018

VIA EMAIL & REGULAR MAIL

Mr. Jim Schaeffer
McKenzie Tank Lines
1966 Commonwealth Lane
Tallahassee, Florida 32303

Re: 5th, 6th and 7th VRP Progress Reports
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 November 21, 2016 Voluntary Remediation Program (VRP) Progress Report 5, the May 19, 2017 VRP Progress Report 6 and the November 20, 2017 VRP Progress Report 7 submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) by the Environmental International Corporation (EIC) on behalf of McKenzie Tank Lines (MTL). After completing its review of the referenced reports, EPD has prepared the following comments:

- 1) Groundwater sampling results from the Seventh VRP Progress Report indicate that groundwater north and east of MW-46S and MW-47D is not horizontally delineated. EPD understands that delineation wells north and east of MW-46S, MW-44D and MW-47D could not be installed due to flowing sand conditions complicating the well installation. Considering groundwater flows across the site to the southwest, EPD would not expect groundwater constituents to begin migrating upgradient beyond the eastern most wells. Please continue with the scheduled groundwater monitoring to observe whether constituents in wells MW-46s and MW-47D will attenuate to levels below delineation criteria.
- 2) Section 4.0 in the Seventh VRP Progress Report states that collecting additional delineation soil samples further west of AOC-6 would be impractical due to a near ground surface water table making soil sample collection above the saturated depth impossible. Further, Section 4.0 states that existing shallow monitoring wells west of AOC-6 adequately address the constituents in that area. EPD does not concur that constituents west of AOC-6 have been adequately addressed or delineated, and requests the following be completed:
 - a) McKenzie should determine whether the saturated area west of AOC-6 meets the definition of a wetland according to the USACE and/or meets the criteria of an ecological habitat. In addition, McKenzie should collect additional saturated soil/sediment samples and shallow groundwater samples to characterize that area west of AOC-6 and compare the results against the appropriate screening criteria (e.g., USEPA's Ecological Screening Values, calculated groundwater risk reduction standards, etc.).

- b) Elevated concentrations of site constituents in soil, sediment and groundwater in the vicinity of AOC-6 may introduce contaminants to the North-South Stormwater Ditch. Please implement the collection of surface water samples in the North-South Stormwater Ditch and East-West Stormwater Ditch that coincide with groundwater sampling events to determine the presence/absence of site constituents in surface water, and to determine whether contaminated surface water is leaving the site through storm water pipes along the western property boundary.
- 3) According to Table 3-2 in the Seventh VRP Progress Report, the most recent samples collected from wells G-22R, MW-57S, MW-58D and RW-8 had turbidity readings that exceed 10 NTU. In future monitoring events, please attempt to reduce turbidity readings to 10 NTU or less prior to sample collection. If turbidity cannot be reduced to 10 NTU or less, please re-develop the well, and document the well development procedure.

Additionally, according to the Sixth VRP Progress Report, monitoring wells RW-1 and RW-4 were not used for contouring due to the effects of excessive siltation. Please attempt to re-develop wells RW-1 and RW-4 to remove any particulate that has settled in the well column. If the wells continue to produce silt and are determined to be damaged, please discuss with EPD whether reinstallation of monitoring wells RW-1 and RW-4 is necessary.

- 4) The updated Site Conceptual Model in the Sixth VRP Progress Report states that arsenic in groundwater will be investigated to confirm previously reported arsenic concentrations in the vicinity of former monitoring well MW-13S. Please include in future progress reports the former location of well MW-13S on the Site Layout Map Figure 1-1, and plans to investigate the area for arsenic in groundwater.
- 5) EPD concurs with the decision to not replace the recently abandoned monitoring well MW-U2 as MW-32 is in close proximity to the former MW-U2 monitoring well location, and will adequately monitor shallow groundwater conditions in that area.
- 6) Data from the Fifth, Sixth, and Seventh VRP monitoring reports indicate that wells MW-2D, MW-4S, MW-50S and RW-8 have had exceedances of 1,1-dichloroethene above the Type 1 RRS delineation criteria of 7.0 µg/L. Please add 1,1-dichloroethene to the list of site constituents of concern and include groundwater monitoring results in the groundwater constituents of concern tables.

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. Should you have any additional questions or concerns please contact Mr. Barrett Fischer of the Response and Remediation Program at (404) 463-7555.

VRP Progress Reports 5, 6 and 7
McKenzie Tank Lines Site #10406
February 26, 2018
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Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Brownlee', is positioned above the printed name.

David Brownlee
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)

File: VRP Application 1391540150 – McKenzie Tank Lines Site #10406

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