

# Georgia Department of Natural Resources

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## Reply To:

Response and Remediation Program  
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Mark Williams, Commissioner  
Environmental Protection Division  
F. Allen Barnes, Director  
Land Protection Branch  
Mark Smith, Branch Chief

August 31, 2011

## VIA E-MAIL AND REGULAR MAIL

VOPAK Terminal Savannah, Inc.  
c/o Mr. Branden L. Jones  
P.O. Box 7390  
Savannah, Georgia 31418

Re: Revised Voluntary Investigation and Remediation Plan and Application, April 2, 2011  
VOPAK Terminal Savannah, HSI Site No. 10464  
Turner and Hart Street, Savannah, Chatham County  
Tax Parcel: 1-0618-01-003L

Dear Mr. Jones:

The Georgia Environmental Protection Division (EPD) has reviewed the April 2, 2011, Voluntary Investigation and Remediation Plan (VIRP) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has noted the following deficiencies:

1. The updated checklist for the VIRP, dated June 30, 2011, included Parcel 1-0618-01-004L. This Parcel has been impacted by petroleum releases from Tank Farm No. 1, but does not appear to be impacted by releases on parcel 1-0618-01-003L, which are discussed in the conceptual site model (CSM). Therefore, EPD is not currently accepting Parcel 1-0618-01-004L as a qualifying parcel because the release on that parcel is not included in the CSM or remedial plan.
2. Vinyl chloride (VC) has not been fully delineated to the acceptable delineation criteria provided in Table 1-2 to the north of MW-27. Also, MW-27 should have been included in the list of wells in section 2.2.2 that do not currently meet Risk Reduction Standards (RRS). Complete horizontal delineation of the qualifying properties must be completed by August 31, 2012. If any non-qualifying property has been affected by the release, Vopak must apply to EPD within six months of detecting the contamination to include the affected property as a qualifying property under the Act or notify EPD the non-qualifying property is not included under the Act.
3. Section 1.4 of the VIRP indicates that Type 3 RRS for soil and Type 4 RRS for groundwater are being used as delineation criteria for site constituents. Please note that this is incorrect as section 12-8-108(1)(E) of the Act states that default, residential cleanup standards should be used as satisfactory evidence of site delineation criteria. Also, Table 1-1 indicates that soil constituents are measured in µg/L. EPD is assuming soil concentrations are measured in µg/kg. Please correct this on all future reports.
4. EPD continues to have doubts that Monitored Natural Attenuation (MNA) will result in groundwater meeting Type 3 / 4 RRS within the requisite 60 months. However, VOPAK may utilize alternate actions to meet the policies and procedures of the Act such as modeling, point of demonstration monitoring and/or institutional controls.
5. In a response to comment 3 of EPD's November 12, 2009 comments VOPAK stated that destroyed wells from the construction activities on the property would be located and properly abandoned and a confirmation letter would be sent to EPD when this was

completed. In EPD's August 26, 2010 letter, comment 2 requested a detailed description of how the wells were abandoned by the next report. To date, EPD has not received any indication on how or if these wells have been properly abandoned. Please, locate and properly abandon the destroyed wells and provide the appropriate documentation by the first progress report.

6. As required by Item 6 of the VIRP Checklist, in order to document the oversight of the VIRP development by a Professional Engineer or Geologist (PE/PG), a monthly summary of hours invoiced and a description of services provided to the participant must be provided as part of the application. The summary for all work completed to date should be included with the first semi-annual report.

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

If you have any questions, please contact Greg Gilmore at (404) 463-0071.

Sincerely,



Alexandra Y. Cleary  
Program Manager  
Response and Remediation Program

c: Raj Mahadevaiah, P.E., EIC Environmental Services  
H. Wilson Tillotson, P.E., Georgia Ports Authority

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