

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

July 29, 2015

VIA E-MAIL AND REGULAR MAIL

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

Re: Seventh VIRP Semi-Annual Progress Report (dated February 27, 2015)
VOPAK Terminal Savannah, HSI Site No. 10464
Turner and Hart Street, Savannah, Chatham County, Georgia
Tax Parcel: 1-0618-01-003L

Dear Mr. Jones:

The Georgia Environmental Protection Division (EPD) has reviewed the Seventh Voluntary Investigation and Remediation Plan (VIRP) Semi-Annual Progress Report (Report) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD offers the following comments, which must be addressed in accordance with the Act:

1. EPD concurs that natural attenuation is occurring at the site and that data collected after enrollment in the VRP has expanded the known footprint of the plume. However, we do not agree that this is the reason that the property will not meet Type 1 through 4 RRS within the 5-year timeframe, as implied in Section 5.3 of the Report. Since enrollment, EPD has indicated that meeting these cleanup goals within the prescribed timeframe was unlikely based on data from wells such as LAW-PZ-8R, MW-29, and PAN-MW-9, all of which have been sampled consistently before and after enrollment. EPD expects the forthcoming report(s) to evaluate the VIRP timeline, consider alternatives to reach risk reduction standards (RRS), and provide a final remediation plan, such as active corrective action or certification to Type 5 RRS with Uniform Environmental Covenants (UECs) to address exposure pathways. EPD is eager to work with VOPAK in developing a path to certification.
2. EPD has previously noted concern over the possibility that contaminated groundwater is discharging to the Savannah River (or the Tidal Flat) as a pathway that could create ecological risks associated with concentrations in surface water or sediment. There is no groundwater data available for the small area between two higher concentration monitoring wells (MW-32 and PAN-MW-9) and the Tidal Flat, and thus no evidence that contaminated groundwater is not discharging to the Tidal Flat. Additionally, Figure 4-6 and 4-7 indicate two discrete plumes of DCE and VC, respectively, at these wells and MW-16, though there is no evidence that these plumes are not connected. Additional monitoring well(s) or sediment sampling may be necessary to better delineate the plume and characterize ecological risks.
3. EPD anticipates reviewing VOPAK's assessment of potential preferential flow through utility trenches, such as the large stormwater conveyance pipe discharging to the Tidal Flat near MW-32, as well as the hydraulic and transport evaluation of the sheet pile wall.

4. EPD anticipates reviewing the forthcoming vapor intrusion study, indicated to assess potential risks to existing and potential future structures as well as an assessment of potential risks to construction workers in areas of shallow groundwater. Risks to construction workers are associated with incidental contact and possible ingestion of contaminated groundwater during subsurface work. Any risks associated with these pathways will need to be addressed in an institutional control.

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.

Please address the above comments in subsequent semi-annual progress reports. EPD anticipates receipt of the next report, which must include the final remediation plan, an updated schedule, and a cost estimate for the remedy and continuing actions, by August 31, 2015. If you have any questions, please contact Jake Carpenter at (404) 657-8656.

Sincerely,



Jason Metzger
Unit Coordinator
Response and Remediation Program

c: Raj Mahadevaiah, P.E., EIC Environmental Services
Christopher Novak, P.E., Georgia Ports Authority

File: HSI 10464