

Georgia Department of Natural Resources
Environmental Protection Division

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December 3, 2014

FILE COPY

VIA EMAIL & REGULAR MAIL

Atlanta Gas Light Company
c/o Mr. Greg Corbett, Director of Environment & Sustainability
Ten Peachtree Place
Atlanta, Georgia 30309

Re: August 2014 Voluntary Remediation Program Application
Augusta MGP Site, HSI Site No. 10132
August, Richmond County, Georgia

Dear Mr. Corbett:

The Georgia Environmental Protection Division (EPD) has received the August 28, 2014, Voluntary Investigation and Remediation Plan (VIRP), that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by the AMEC on behalf of Atlanta Gas Light Company (AGLC). After completing its review of the application, EPD has prepared the following comments:

Conceptual Site Model

- 1) No surface water data has been presented within the VRP Application to support or demonstrate the elimination of the noted 3rd Level Canal as a surface water exposure pathway. Please include a description of the surface water exposure pathway, including current surface water data, a more detailed description of the past corrective actions completed in the 3rd Level Canal, and a rationale for why the Canal should or should not be considered a complete pathway.
- 2) Considering that the in-situ stabilization (ISS) corrective action will be implemented to not only address source material, but to also address groundwater quality issues, groundwater cleanup criteria/goals should be developed prior to the implementation of the ISS corrective action. In particular, pre- and post-ISS groundwater evaluations should be developed and implemented to assess the degree of influence the ISS remedy will have on the groundwater quality at the site. Please note that this may require the installation of additional groundwater monitoring well locations to supplement the conceptual site model and contribute to the characterization of the dissolved phase groundwater plume.
- 3) In support of addressing the delineation requirements included in Section 12-8-1-8 of the Act, please revise Table 1 to indicate the site specific delineation criteria and cleanup standards that were used or will be used for each of the established site-specific constituents of interest at the site as they are applied to each applicable exposure pathway (soils, sediment, groundwater, surface water, vapor intrusion).

- 4) Section 3.4.2.1, Surface Soil and Sediments Ingestion and Contact, of the VRP Application indicated that AGLC has remediated this exposure pathway as described in Section 2.3 of the Application. However, Section 2.3 does not include definitive information to demonstrate that this exposure pathway has been remediated and eliminated.
Additional information will be needed to demonstrate that the elimination of this exposure pathway including but not limited to the following:
 - a. Indication of the delineation criteria and cleanup standards that were used to demonstrate compliance.
 - b. Include copies of the formal letters from EPD approving the referenced criteria, cleanup standards, and associated compliance certification.
 - c. Provide a reference to any applicable figure(s) and data table(s) that were used from previous report submittals to demonstrate compliance, or provide them as part of the supplemental supporting documentation to the VIRP.
- 5) Based on the groundwater data and associated file information for the site, additional groundwater data will be required at the following locations, in addition to those proposed within the VRP Application, in order to complete delineation requirements in accordance with Section 12-8-1-8 of the Act:
 - a. Section 3.3.1 of the VRP Application indicated that the extent of impacts within the Galliard Zone north of monitoring well location MW-603 has not been delineated. Additional data will be required to delineate and characterize the vertical and horizontal extent of groundwater impacts in this area. In addition, according to the September 2014 16th Semiannual Corrective Action Effectiveness Report, dense non-aqueous phase liquid (DNAPL) was detected in monitoring locations MW-603 and MW-502D. Please ensure that the delineation and characterization activities in the area of MW-603 also include the delineation and characterization of the detected source material.
 - b. Horizontal delineation the bedrock impacts to the northwest of monitoring well MW-318.
 - c. Vertical delineation to the extent that will be influential to the established Remedial Action Objectives will need to be completed for the site.
 - d. Please note that arsenic was detected in monitoring location MW-408S at 0.143 mg/L and nickel at monitoring location MW-306SAP at 0.378 mg/L. Please provide additional information relating to the origin of these particular contaminants and a determination of their associated delineation requirements.
- 6) Please include a proposed corrective action for the above referenced DNAPL source material identified in the areas of MW-502D and MW-603.
- 7) According the available file information for the subject site, a May 13, 2010, Continuing Action Monitoring Plan (CAMP) exists and includes deed restriction and affidavit documentation for multiple site related parcels. Please ensure that the warranty deed documentation included in the VIRP incorporates all pertinent deed documentation from this CAMP, and that the VIRP clearly links each of the warranty deed documents included in Appendix B to each of the listed qualifying properties.

- 8) Please note that as part of future site related institutional controls that may be implemented as part of the VRP, new Uniform Environmental Covenants (UEC) will need to be executed for all parcels where source materials will be left in place, in particular the parcels associated with the ISS remedy. For any additional parcels not associated with the ISS remedy but overlying the groundwater plume (above risk reduction standards), pre-existing groundwater use deed restrictions that were implemented as part of prior institutional controls will be acceptable. However, EPD is recommending that for any parcels that are found to overlie the groundwater plume without pre-existing deed restrictions in place that all practical attempts be made to enact new UECs for these applicable parcels. Please note that at this time EPD cannot concur with the sole use of the Augusta-Richmond County Code well restriction to demonstrate the groundwater exposure pathway for these applicable parcels will remain incomplete during the future property use(s). In addition, please note that, as mentioned in Comment (3) above, implementation of the institutional controls for the impact to groundwater may require the installation of additional groundwater monitoring well locations to supplement the conceptual site model and ultimately limit the amount of parcels requiring UECs.

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. EPD may, at its sole discretion, review and comment on documents submitted by AGLC. However, failure of EPD to respond to a submittal within any timeframe does not relieve AGLC from complying with the provisions, purposes, standards, and policies of the Act.

Please ensure that the above listed comments are addressed and documented in accordance with schedule established by Conditions 3 and 4 of the EPD-VRP-CO-11. Should you have any additional questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

cc: Carol Geiger, KMCL
File: VRP – August MPG Site #10132