



**ENVIRONMENTAL PROTECTION DIVISION**

**Richard E. Dunn, Director**

**Land Protection Branch**  
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404-657-8600

February 21, 2018

**VIA E-MAIL AND REGULAR MAIL**

**FILE COPY**

Mercer University  
c/o Dr. James S. Netherton  
Executive VP for Administration & Finance  
1400 Coleman Avenue  
Macon, Georgia 31207

Re: Third VIRP Semi-Annual Progress Report – August 26, 2016  
Mercer University Triangle Site, HSI No. 10779  
1535 Montpelier Avenue, Macon, Bibb County, Georgia

Dear Dr. Netherton:

The Georgia Environmental Protection Division (EPD) has reviewed the Third Voluntary Investigation and Remediation Plan (VIRP) Semi-Annual Progress Report dated August 26, 2016. EPD offers the following comments which should be addressed in the next Progress Report:

1. The VISL calculator used in the vapor intrusion evaluation should be updated to the June 2017 Version. Note that EPA performs routine updates to the VISL calculator which may affect risk outcomes. As a result, EPD has derived risk estimates (VISL Calculator Version 3.5, June 2017 Regional Screening Levels) that differed from those referenced in the report. Please ensure that the latest VISL calculator is used in future evaluations. This can be done by visiting EPA's vapor intrusion website at (<https://www.epa.gov/vaporintrusion/vapor-intrusion-screening-levels-visls>) prior to conducting the analysis.
2. Additive effects from inhalation exposure to multiple substances across clusters of groundwater monitoring wells in areas that provide for potential residential or non-residential exposure were not considered in the vapor intrusion analysis. It is recommended that the vapor risk and hazard estimates be summed across detected substances to determine the cumulative risk/hazard to a receptor. If the hazard index (HI) exceeds 1 because of summing several hazard quotients of similar value, the hazard estimates may be segregated by critical effect, target organ or mechanism of action to derive separate HIs for each toxicologic group. Please revise the text and VISL spreadsheet accordingly.
3. The referenced Report indicated that the volatile organic compounds (VOCs) concentrations data from the most recent groundwater sampling event were used to derive the vapor risk estimates. Please note that EPD recommends using the maximum post remedial concentrations when assessing the vapor intrusion pathway.

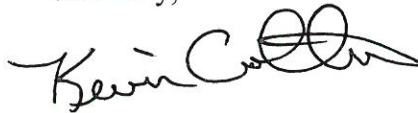
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4. Please note that if the concentration of tetrachloroethylene (PCE) in MW-14 continues to represent an increasing PCE, additional data may be necessary to demonstrate that delineation has been completed to the extent technically practicable in accordance with the Act.
5. EPD requests that a uniform environmental covenant (UEC) be implemented for the source property to support the compliance determinations and for the future protection of the established completed exposure pathway. Additional UEC parcel(s) may be necessary depending upon the compliance determinations. The Uniform Environmental Covenant (UEC) Template can be accessed on the EPD website (<https://epd.georgia.gov/uniform-environmental-covenants>) along with a UEC guidance document.

Please note EPD has not received your 2017 Progress Report which was due by August 2017 as scheduled in the VIRP acceptance letter. Please submit the 2017 report within 30 days of the date of this letter and a response to our comments above in the 2017 Report or separately. If you have any questions, please contact Montague M<sup>c</sup>Pherson of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Kevin Collins  
Unit Coordinator  
Response and Remediation Program

c: Jason A. Cooper - Geotechnical & Environmental Consultants, Inc.

File: HSI# 10779; 259-0050

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