



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

September 29, 2017

VIA E-MAIL AND REGULAR MAIL

Georgia Department of Transportation
c/o James Clute, State Facilities Manager
One Georgia Center
600 West Peachtree Street, NW 7th Floor
Atlanta, Georgia 30308

Re: March 27, 2017 Voluntary Remediation Program Application
Georgia Department of Transportation-Jesup District Office Property, HSI #10742
204 North Highway 301, Jesup, Wayne County, Georgia
Tax Parcel 112-6

Dear Mr. Clute:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) and Application dated March 27, 2017 submitted by the Georgia Department of Transportation (GDOT) for the subject tax parcel (the "Property") pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100 *et. seq.* EPD offers the following comments, which should be addressed in accordance with the Act:

1. Figure 2 and the Tax Plats found in Appendix I of the VIRP do not clearly show the qualifying property boundary, abutting properties, and tax parcel identification numbers as required by Item #3 of the VRP Application Form Checklist (AFC). Please submit a tax plat or other figure that includes the qualifying Property boundary, abutting properties, and tax parcel identification numbers in the first VRP semiannual progress report. Figure 2 or the Wayne County tax map in Appendix I of the VIRP may be modified to satisfy this condition.
2. The Type 1 groundwater risk reduction standards (RRS) in Table 4 of the VIRP are acceptable for use as the Type 1 delineation standards for the Property.
3. Section 4.4 and Appendix VII of the VIRP describe the VRP projected milestone schedule for remediation of the qualifying Property. Section 4.4 of the VIRP proposes the implementation of a uniform environmental covenant (UEC) as a groundwater use institutional control; installation of one monitoring well; two groundwater sampling events (one comprehensive event and one limited event); and the submittal of reports within 60 days of receipt of analytical data for each sampling event. The VIRP milestone schedule should be revised to include the four generic milestone events required by Item #s 5.a. through 5.b. of the AFC, which requires the submittal of semiannual progress reports and the final CSR.

GDOT may adjust the projected timeframes for Items 5.a through 5.b. as appropriate. The revised milestone schedule should project dates for completion of milestone tasks, should be updated as corrective action progresses at the qualifying Property, and should be included in all future periodic reports. The schedule should also include additional milestone events resulting from the comments listed below.

4. Section 2.2.1 of the VIRP concludes that soils at the qualifying Property meets Type 3 RRS; however, based on EPD's review, soils appear to meet Type 1 RRS. GDOT should revise Table 2 of the VIRP to compare soil data to Type 1 RRS rather than Type 3 RRS and provide a certification of compliance for soil in the first progress report.
5. EPD concurs with the proposal to install vertical delineation well PMW-25, but requests that the well be installed proximal to MW-3A due to the noted data trends for the constituents of concern at this location. Please note that based on the data from future monitoring events, additional vertical delineation to the extent practicable may be required.
6. The first VRP semiannual progress report should clarify the VRP remediation goals for groundwater at the qualifying Property pursuant to Section 12-8-108 of the Act. The proposed Point of Demonstration (POD) well and proposed Point of Exposure (POE) need to be clearly specified. It seems that the intent of Section 3.3 of the VIRP was to propose MW-6 as the POD for the upper aquifer and identify the POE as a point 1000 feet downgradient of MW-06. In addition, the groundwater flow direction in the upper aquifer is to the east (Figure 7A), and it is noted that there are no wells directly downgradient of MW-15 which is situated at the leading edge of the plume (Figure 9A). An additional well downgradient of MW-15 should be considered to serve as an upper aquifer POD well. Please provide a discussion of point of demonstration monitoring for the Property in the first progress report, including the detections identified in MW-15.
7. According to Section 4.3 of the VIRP, the Property does not have a groundwater monitoring schedule, but semiannual sampling is recommended for a period of one year. The two groundwater monitoring and gauging events include one comprehensive and one limited event at select monitoring wells. EPD approves the proposed sampling schedule, but requests that monitoring well MW-15 is included as one of the wells to be sampled in the proposed limited sampling event. Please note that EPD reserves the right to require additional monitoring/ gauging events and may also require modifications to the limited sampling event monitoring network pending the results of the two approved semiannual events. GDOT may also propose future modifications for EPD's approval.
8. The VIRP proposes that lead be analyzed from groundwater samples collected from MW-7D, MW-8A, and MW-12A in response to Comment #3 in EPD's March 2015 Progress Report comment letter dated January 12, 2017. EPD acknowledges GDOT's inclusion of future metals analyses in Section 4.3 of the VIRP and requests that previous lead analysis data and the new data are included in the next VRP progress report.

September 29, 2017

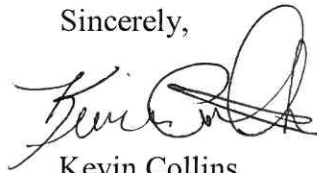
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9. The October 6, 2006 compliance status report (CSR) identifies the Former Septic Drain Field as the source of volatile organic compound (VOC) impacts to groundwater; however, it was not identified in Figure 6, *Site Map*, of the VIRP. Future progress reports and the final CSR should identify the Former Septic Field source area in the text and figures, as appropriate.
10. It appears that concentrations entered into the VISL model (Appendix VI of the VIRP) were not converted from mg/l to ug/l, therefore, the results presented in Section 3.1.2 are understated and the VISL model should be modified to reflect the correct groundwater concentrations. As a result, some VOCs exceed a TCR level of 1.0E-05 or a THQ of 1.0 and additional lines of evidence should be considered to address the potential vapor intrusion pathway.

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

Please address the comments listed above in the first VRP semiannual progress report, or as otherwise appropriate, which should be submitted to EPD by March 30, 2018. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at 404/657-0487.

Sincerely,



Kevin Collins
Unit Coordinator
Response and Remediation Program

c: S&ME, Inc., William J. Wagner, Jr., PG. and Peter J. Fleury (Via email)

File: HSI Site 10742, ID No. 143-0016

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