## Georgia Department of Natural Resources

**Environmental Protection Division** 

2 Martin Luther King, Jr. Drive, SE, Suite 1462 East, Atlanta, Georgia 30334 Judson H. Turner, Director Land Protection Branch Keith M. Bentley, Branch Chief 404-657-8600

March 15, 2013



## **VIA E-MAIL AND REGULAR MAIL**

CSX Transportation, Inc. c/o Mr. Matt Adkins CHMM, Manager Environmental Remediation 351 Thornton Road, Suite 125 Lithia Springs, Georgia 30122

Re: Comments on Voluntary Remediation Program Application dated April 26, 2012 CSX Transportation DePriest Signal Shop (HSI #10611) 641 East Liberty Street, Savannah, Chatham County, Georgia Tax Parcel ID# 2-0033-12-001

## Dear Mr. Adkins:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated April 26, 2012 submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has noted the following concerns that need to be addressed.

- The Type 4 risk reduction standards presented in Table 4.3 need to be reviewed for errors and/or updated with the latest toxicity values. Also, EPD needs supporting calculations used to derive these standards including any site specific soil screening levels used for calculating leaching from soil to groundwater. The latest toxicity values can be found the USEPA Regional Screening Level tables found at the following website:
  - http://www.epa.gov/reg3hwmd/risk/human/rb-concentration\_table/
- CSX must revise the Type 4 risk reduction standards and any plans for corrective action to indicate a surface soil interval of 0-2 foot as specified in Section 391-3-19-.07(9)(d)(2) of the Rules for Hazardous Site Response.
- Please revise Figures 2.4, 2.5, 2.6, 2.7, 2.8, 2.9, 2.10, and 3.1 to have legible fonts. In those figures, the smallest text is unreadable on both the large format printouts and the electronic copy of the file.
- CSX Transportation must meet all requirements for filing an affidavit and any deed notices as required by Condition 1 of the VRP Approval Letter dated March 15. 2013.

CSXT DePriest Signal Shop VRP Comments March 15, 2013 Page 2

Should you have any question or concerns, please contact Mr. Bill Williams of the Response and Remediation Program at (404) 657-7126.

Sincerely,

Charles D. Williams

Charles B. William

Program Manager,

Response and Remediation Program

C: Ronald Holley

File: Site #10611

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