



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

November 20, 2017

CSX Real Property, Inc.
c/o Mr. Coley Campbell, P.E.
Manager Environmental & Property Management
6737 Southpoint Drive South
Jacksonville, Florida 32216

Subject: Response to EPD December 28, 2016 and March 10, 2017 Comments
Report of Additional Closure Activities
CSX Transportation - Powell Duffryn (HSI 10101)
Hutchinson Island, Savannah, Chatham County, Georgia

Dear Mr. Campbell:

The Georgia Environmental Protection Division (EPD) has reviewed the Response to EPD December 28, 2016 and March 10, 2017 Comments (Response to EPD Comments) dated May 10, 2017 regarding the Compliance Status Report (CSR) dated August 1, 2016 and the Report of Additional Closure Activities dated August 2, 2017. EPD finds that our comments regarding the CSR have either been adequately addressed or are planned to be addressed by the Uniform Environmental Covenant (UEC). Specifically, EPD notes the following regarding the comments in our March 10, 2017 letter:

1. Comment 1 has been adequately addressed. Based on plume behavior to date and the conservative input values used in the modeling effort, EPD concurs that the model presented in the Response to EPD Comments is adequate to demonstrate that the ammonia/ammonium plume does not pose an unacceptable threat to human or ecological receptors if the recommended institutional controls (including groundwater use restrictions) are employed.
2. Comment 2 has been adequately addressed.
3. Your response to Comment 3 is acknowledged. EPD understands that the evaluation of vapor intrusion for future buildings is being considered in the UEC.
4. Your response to Comment 4 is acknowledged. EPD understands that the issue of exposure to groundwater during future construction activity is being considered in the UEC.
5. Comment 5 has been adequately addressed. The removal of soil containing petroleum source material around four (4) utility poles was documented in the Report of Additional Closure Activities. Therefore, the Certification on Compliance with Risk Reduction Standards presented in the CSR dated August 1, 2016 is sufficient.
6. Comment 6 has been adequately addressed.

The draft UEC is currently under review by EPD. Once the UEC is fully executed and filed with the county deed records and the Director concurs with the Certification of Compliance with Risk Reduction Standards, this site can be removed from the Hazardous Site Inventory. If you have any questions, please contact Larry Kloet at 404-463-7505.

Sincerely,



David Hayes
Unit Coordinator
Response and Remediation Program

c: Matt Grostick, Amec Foster Wheeler (via email)
Chuck Ferry, Amec Foster Wheeler (via email)
Steve Foley, Amec Foster Wheeler (via email)

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