

March 14, 2018

**VIA U.S. MAIL & EMAIL**

Epic Midstream, LLC – North Terminal (Formerly Axeon Specialty Products)  
c/o Linda Ferguson, Director of Compliance  
3225 Hawkinsville Road  
Macon, Georgia 31216

Re: Third Semi-Annual VRP Progress Report (May 30, 2017)  
Fourth Semi-Annual VRP Progress Report (December 1, 2017)  
Epic Midstream – North Terminal (Formerly Axeon Specialty Products), VRP # 1440101197  
7 Foundation Drive, Savannah, Chatham County, Georgia

Dear Ms. Ferguson:

The Georgia Environmental Protection Division (EPD) has reviewed the above-referenced documents that were submitted by GHD on behalf of Epic Midstream for the North Terminal Site, Savannah, Georgia pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, *et. seq.* Based on the review of the above referenced reports and the discussions during the November 7, 2017 meeting between EPD and site representatives, EPD has the following comments, which should be addressed in accordance with the Act.

1. Epic Midstream recently merged with International Matex Tank Terminals (IMTT). Please submit a Voluntary Remediation Program (VRP) application amendment to reflect the ownership change.
2. Please ensure that the site's groundwater data is updated prior to the completion of the Voluntary Remediation Program (VRP) Compliance Status Report (CSR).
3. As discussed in the above referenced meeting and as presented in the VRP Progress Reports 3 and 4, Light Non-Aqueous Phase Liquids (LNAPL) recoverability is generally shown to diminish over time in the wells in which skimming evaluations were conducted and LNAPL transmissivities are shown to be below or approaching the de minimus criterion of 0.8 ft<sup>2</sup>/day. EPD concurs with the proposal to continue skimming LNAPL from the wells in which skimming evaluations have already been conducted, especially wells in which the recovery rates have been demonstrated to be variable, to maximize recovery of LNAPL. EPD also concurs with the recommendation to conduct skimming at wells that exhibit high in-well LNAPL thickness.
4. Transmissivity decline curves presented in the progress reports show that LNAPL transmissivities are mostly below the de minimus criterion of 0.8 ft<sup>2</sup>/day. Please provide equations and data to support how the LNAPL transmissivities were calculated in the next progress report.
5. Although it is noted that the conclusions regarding LNAPL recovery and reduction in LNAPL transmissivity trends are consistent with Interstate Technology & Regulatory Council (ITRC) guidance, the case for technical impracticability must be demonstrated in accordance with Section

12-8-102(15) of the Act. In the next progress report, please include an estimate of the incremental expenditures disproportionate to the incremental benefit that would be associated with continuing to remediate LNAPL, particularly in locations where monitoring wells typically contain several feet of LNAPL.

The above 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 Epic-Midstream. However, failure of EPD to respond to a submittal within any timeframe does not relieve Epic-Midstream complying with the provisions, purposes, standards, and policies of the Act.

Should you have any question or concerns regarding this submittal, please direct all future communication to Mr. David Hayes of the Response and Remediation Program at (404) 657-8672.

Sincerely,



Kevin Collins  
Response Development Unit Manager  
Response and Remediation Program

cc: John DiZinno – GHD (via email)

File: Epic Midstream (Formerly Axeon Specialty Products), 242-0321