



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

October 3, 2018

Via U.S. Mail

And Email: oscar@protransportusa.com

Royal Transportation Service, Inc.
c/o Oscar Acharandio, President
10800 NW South River Drive
Miami, Florida 33178

Subject: EPD Comments
Voluntary Remediation Program Application dated January 26, 2018
Coastal Concrete Site, HSI Site No. 10867
2337 Louisville Road, Savannah, Chatham County, Georgia

Dear Mr. Acharandio:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated January 26, 2018 that was submitted by Royal Transportation Service, Inc. (Royal Transportation) as an application for enrollment in the Voluntary Remediation Program (VRP) for the referenced site. EPD understands that a comprehensive site investigation has yet to be performed and that the conceptual site model will be revised following implementation of the VIRP. EPD provides the following comments to guide the future evaluation based on the preliminary investigation details provided:

1. Future submittals should include all field sampling forms and laboratory analytical reports. The VRP Application includes Appendix D - Limited Phase II Site Investigation Report (March 2012); however Appendix C – Laboratory Analytical Data was not included in the report. Please submit the field forms and laboratory reports for this investigation with the first semi-annual progress report.
2. While the VRP Application text specifies delineation to Type I Risk Reduction Standards, only six borings and monitoring wells were included in the VIRP. EPD has interpreted the plan to be adaptive to include as many borings as is necessary to appropriately delineate the soil and groundwater impacts to VRP delineation criteria.
3. The proposed boring locations shown on Figure 4 appear to be step-out borings at distances ranging from 40 to 100 feet from the originally installed monitoring wells. As the sample spacing and density will depend, in part, on the location of the source area, efforts should be taken to delineate the release source(s) adequately.
4. The VRP Application identifies an unused production well on-site. The grout seal in old, unused wells can potentially deteriorate, creating preferential pathways for groundwater

impacts. EPD recommends an evaluation of the production well condition, depth, construction, and water chemistry, along with potential decommissioning of this well.

5. It is referenced that groundwater sampling will be conducted in accordance with the USEPA Region 4 SESD Groundwater Sampling Operating Procedure dated March 2013. EPD notes that the current version of this operating procedure is dated April 2017.
6. EPD appreciates the inclusion of a Type III monitoring well in the VIRP to vertically delineate impacts. While performing the vertical delineation, data should be collected to confirm that the clay formation identified in section 4.1.3 at a depth of 15 feet below grade is indeed a confining unit.

The above recommendations should be addressed 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 Royal Transportation. However, failure of EPD to respond to a submittal within any timeframe does not relieve Royal Transportation from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Michael Smilley of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: William S. Anderson, III, Terracon Consultants, Inc. (via email: wsanderson@terracon.com)

File: 242-0244 (VRP)