



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

March 29, 2019

Via U.S. Mail

And Email: bmattox@sschemical.com

Seagate Terminals Savannah, LLC
c/o Bobby Mattox, Site Manager
P.O. Box 546
Savannah, Georgia 31402

Subject: EPD Comments
Voluntary Investigation and Remediation Plan
2017 and 2018 Annual Status Reports
Southern States Phosphate and Fertilizer Company, HSI Site No. 10371
1600 East President Street, Savannah, Chatham County, Georgia

Dear Mr. Mattox:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP), dated March 1, 2018, submitted by Seagate Terminals Savannah, LLC (Seagate) as an application for enrollment in the Voluntary Remediation Program (VRP) for the above referenced site. As part of the VIRP review, EPD also reviewed the 2017 and 2018 Annual Status Reports. EPD has the following comments:

1. Qualifying Property Determination: Clarification is requested regarding the Qualifying Properties for enrollment in the VRP.
 - a. The Qualifying Property (Tax Parcel ID: 1-0289-01-008) and four Additional Qualifying Properties (Tax Parcel IDs: 1-0368-01-014, 1-0289-01-013, 1-0289-01-007, and 1-0289-01-005) were included in the application. Figure 2 of the application lists several properties as "Subject Parcels" including Tax Parcel IDs: 1-0369-01-002L and 1-0368-01-013. These properties are not listed as Additional Qualifying Properties on page 4 of the VRP Application. It appears that 1-0289-01-013 (BASF Catalysts LLC) may have been inadvertently listed as a qualifying property instead of 1-0368-01-013. Please revise the list of Additional Qualifying Properties on the VRP Application Form as appropriate, and submit this with the 1st VRP Progress Report.
 - b. A narrow property along Dulany Avenue divides Tax Parcel ID: 1-0368-01-013. Please provide additional information regarding the ownership of this property as it may need to be listed as an Additional Qualifying Property.
 - c. A railroad property divides Tax Parcel ID: 1-0289-01-008. The Savannah GIS System Lists the Property as Seaboard Coastline Railroad. Please provide additional information regarding the ownership of this railroad property as it may need to be listed as an Additional Qualifying Property.

- d. A narrow property along Regis Street subdivides Tax Parcel ID: 1-0289-01-005 and 1-0289-01-008. Please provide additional information regarding the ownership of this property as it may need to be listed as an Additional Qualifying Property.
2. Additional Delineation: EPD agrees that additional groundwater and soil delineation is required at the facility, however the VIRP specifies delineation to Type 4 RRS. Please note that delineation criteria are typically Type 1 RRS for groundwater and Type 1 or 2 RRS for soil. In addition to the proposed monitoring locations specified in the VIRP, EPD requests that the following delineation activities be performed:
 - a. Delineation near historical monitoring well MW-14 appears incomplete. EPD acknowledges the technical challenges associated with saturated soils and wetlands in this area. However, delineation activities must be completed to the delineation criteria provided under the VRP Act. EPD is available to meet at the site to discuss this location and potential options to complete delineation.
 - b. Additional groundwater delineation is needed to define the lateral extent of RRS exceedances identified in monitoring well MW-2D. EPD recommends that an additional monitoring well be installed and screened at a similar interval northwest of monitoring well MW-2D.
3. Source Areas and Restricted Use Zones: Clarification is requested regarding historical release areas and proposed restricted use zones (RUZs). While much of this information has been presented in annual reports, the information should be compiled and summarized in future VRP submittals.
 - a. Figure 4 – Historical Source Areas presents the perimeter of several historical release areas. Please summarize all historical sampling and corrective action activities related to each source zone, with associated analytical results, in a future VRP submittal.
 - b. Figure 19 – Proposed VRP Soil Investigation Plan presents preliminary RUZs along with additional proposed soil sampling locations. Once the proposed soil samples are collected, new and historical analytical results necessary to define each RUZ (side-wall samples, etc.) should be provided in a future VRP submittal. In addition, the rationale for each activity and use limitation should be incorporated into a future VRP submittal.
 - c. All historical excavation data, including side-wall and excavation floor sampling results, should be summarized in a future VRP submittal.
4. The first paragraph on page 15 states that there are temporary monitoring wells installed at the subject property. Please clarify if there are temporary wells at the site or if all wells are permanent monitoring wells.
5. Proposed Actions for 2019: The 2018 Annual Status Report proposed several actions for completion in 2019, including the collection of additional samples and the replacement of monitoring well MW-3. EPD concurs with these activities.

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 Seagate. However, failure of EPD to respond to a submittal within any timeframe does not relieve Seagate from complying

VRP Application Comments
Seagate Terminals Savannah, LLC
March 29, 2019
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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) 463-0530.

Sincerely,

 on behalf of

Jason Metzger
Program Manager
Response and Remediation Program

c: Justin Johnson, Terracon (via email: justin.johnson2@terracon.com)

File: 242-0205 (VRP)

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