

# **Georgia Department of Natural Resources**

## **Environmental Protection Division**

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May 26, 2015

### **VIA EMAIL & REGULAR MAIL**

Atlanta Gas Light Company  
c/o Mr. Greg Corbett, Director of Environment & Sustainability  
Ten Peachtree Place  
Atlanta, Georgia 30309

Re: October 2014 Voluntary Remediation Program Application  
Macon MGP Site, HSI Site No. 10511  
Macon, Bibb County, Georgia

Dear Mr. Corbett:

The Georgia Environmental Protection Division (EPD) has received the October 14, 2014, Voluntary Investigation and Remediation Plan (VIRP), that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by ERM on behalf of Atlanta Gas Light Company (AGLC) and Georgia Power Company. After completing its review of the application, EPD has prepared the following comments:

#### **Conceptual Site Model**

- 1) EPD concurs with the Appendix G proposed DNAPL investigation activities that are contingent upon AGLC being granted access to the applicable properties. In addition, according to Appendix G, DNAPL recovery sumps will be installed where applicable during investigation activities in the area of MW-305D. EPD recommends that this same contingency measure be applied site-wide following the installation of the additional in-situ stabilization (ISS) mass.
- 2) Section 2.3.2 of the VRP Application indicates that the "Lower Outfall of the Ocmulgee River" is "in compliance with the sediment removal and clean-up goals in accordance with the standards, and Type 5 risk reduction standards (RRS), established per the approved January 5, 2001, Corrective Action Plan." However, no data associated with the Ocmulgee River, surface water or sediment, has been presented within the VRP Application to support or demonstrate the elimination of the Ocmulgee River as a surface water exposure pathway. Consequently, the first Semi-Annual VRP Progress Report needs the following information for the surface water pathway:
  - a. A description of the surface water exposure pathway, including surface water and sediment data;
  - b. A more detailed description of the past corrective actions completed in the Ocmulgee River; and,
  - c. Please ensure that any necessary monitoring and maintenance activities that are applicable to the remediated portion of the Ocmulgee River are included as part of the continued monitoring and maintenance associated with the site specific Uniform Environmental Covenant(s) (UEC).

- 3) Please ensure that the following information is included as part of the final VRP Compliance Status Report documentation to demonstrate that the exposure pathway for soil has been remediated and is in compliance with established standards:
  - a. Please include any applicable figure(s) and data table(s) for the Mulberry Street MGP and surrounding properties, similar to those figures included in the CAP Addendum in Appendix C for the Western Portion, that were used from previous report submittals to demonstrate compliance.
  - b. According to Section 3.4, "delineation for all media at the site has been complete." In support of addressing the delineation requirements included in Section 12-8-1-8 of the Act, please provide additional information (tables, figures, etc.) that illustrates which particular constituents of interest (COI), and associated exposure pathway(s), are in compliance for each certified property illustrated in Figure 2-1. Please ensure that this documentation (tables, figures, etc.) references the formal EPD letter(s) approving the criteria and/or cleanup standard.
  - c. Please ensure that the delineation and corrective action requirements are met for those impacts noted in Appendix C and designated as "Inorganic Type 1 RRS exceedances not related to MGP impacts."
- 4) While EPD may be deferring comments related to additional horizontal groundwater delineation requirements in accordance with Section 12-8-1-8 of the Act until after the completion of the ISS remedy and the installation of the associated performance monitoring network, please note that vertical delineation to the extent that will be influential to the established corrective action objectives will need to be completed for the site prior to the completion of the VRP CSR. In addition, please ensure that the following comments are addressed within the first semi-annual VRP Progress Report submittal:
  - a. Section 5.3.1 references Figure 5-1, Point of Demonstration Wells, please provide a description of the established point of exposure (POE) and the threshold values that will be utilized at the POD wells to demonstrate compliance. Please note that groundwater modeling will be needed to demonstrate the viability of these wells as demonstration wells for the POE.
  - b. EPD will defer concurrence with the Bedrock POD wells until after completion of the investigation activities included in Appendix H, Bedrock Groundwater Investigation Work Plan.
- 5) Please note that as part of future site related institutional controls that may be implemented as part of the VRP, new UECs will need to be executed for all parcels where source materials will be left in place, in particular the parcels associated with the ISS remedy. For any additional parcels not associated with the ISS remedy but overlying the groundwater plume (above risk reduction standards), pre-existing groundwater use deed restrictions that were implemented as part of prior institutional controls will be acceptable. However, EPD is recommending that for any parcels that are found to overlie the groundwater plume without pre-existing deed restrictions in place that all practical attempts be made to enact new UECs for these applicable parcels.

- 6) The following comments pertain to technical/clerical issues noted within the VRP Application:
  - a. Section 1.1 states that the VRP Application is being submitted on behalf of AGLC and Georgia Power Company, however the Georgia Power Company information was not included in the VRP Application and Checklist in Appendix A. Please revise Appendix A and provide additional information regarding Georgia Power Company and their association with the site property.
  - b. Please revise Figure 1-3, Property Ownership Map, to include the parcel and property owner information for the parcels adjacent to the site and north/northeast of Walnut Street, and adjacent and west of the Norfolk Southern Railroad.
  - c. According to Section 5.1, “final exposure and compliance certification will be established on the basis of “representative exposure concentrations,”” please provide additional information describing how the “representative exposure concentrations” will be determined.
  - d. Section 5.2, indicates that monitoring of DNAPL will be conducted during planned monitoring events “see Section 6.3.” There is no Section 6.3 in the report, please revise.
  - e. Section 5.2 indicates that vacuum enhanced fluid recovery events (VEFR) would be conducted at wells where DNAPL accumulation is greater than 0.5 feet. EPD requests that for wells with less than 0.5 feet of measurable DNAPL that absorbent socks, or similar remedial technology, be placed in these wells.
  - f. Appendix A – parcel R073-0384 is listed as being 2.52 acres; however, the tax assessor information for the parcel lists 1.73 acres, please explain and revise as necessary. In addition, acreage information for the remaining parcels indicates that “final parcel segregation to provide definitive metes and bounds,” please provide this information to complete the application for the qualifying properties. Also, the tax parcel ID for the 122 Walnut St. should be revised to R07-205 in accordance with the online tax assessor information.
- 7) The following comments pertain to technical/clerical issues noted within Appendix C, Western Portion and MW-101 Area Groundwater CAP Addendum:
  - a. EPD understands that the extent of the planned ISS corrective measure will be limited to the south and west due to the presence of adjacent structures and associated property use; however, EPD requests that the VIRP activities include a proposed remedial measure to address the potentially complete vapor intrusion pathway and future soil exposures for the identified MGP impacts beneath the Prodigy Woodworks structure in the areas of soil boring locations VIB-11 through -13.
  - b. According to Appendix C, daily construction quality assurance reports would be prepared during the corrective actions (ISS and soil removal). In addition to these reports, please ensure that EPD is immediately notified by email of any failed columns and the actions taken to remedy the failure(s).
  - c. Please revise the reporting schedule to include semi-annual VRP progress reports rather than Annual Corrective Action Effectiveness Reports.

- 8) Appendix H, Bedrock Groundwater Investigation Plan, indicated that 10- or 20-ft. screen lengths would be used during the installation of the planned bedrock investigation wells. Please ensure that proper justification is provided for the use of a screen length greater than 10-ft. In addition, please provide a figure illustrating the proposed locations for the bedrock groundwater investigation wells as part of the 1<sup>st</sup> Semiannual Progress Report.
- 9) Appendix I, Section 3.3, the rejected data (Section 3.3) should be noted as so, but not removed from the tables as future sampling may confirm a trend that may initially be perceived as anomalous data.
- 10) Appendix I, Bedrock Groundwater Monitoring Plan: While natural attenuation (NA) can be utilized as an ongoing component of the corrective measures as the site nears the point of compliance, NA is not typically built into remedial strategies until the non-aqueous phase liquid (NAPL) is removed to the extent practicable. In addition, based on the proposal to utilize a UEC to prevent future groundwater use and eliminate the groundwater exposure pathway, implementing NA aspects as part of the future corrective action may not provide a significant contribution to the future remedial objectives for groundwater. Therefore, EPD suggests that NA parameters could be incorporated into the post ISS evaluation monitoring, or into the monitoring activities associated with the groundwater modeling, in the event that any of the planned NA parameters be useful/applicable to these lines of investigation.

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

Please ensure that the above listed comments are addressed and documented in accordance with schedule established by Conditions 3 and 4 of the EPD-VRP-CO-12. Should you have any additional questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

cc: Carol Geiger, KMCL  
Erik Rolle, Georgia Power Company  
File: VRP – Macon MPG Site #10511