



February 21, 2017

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

VIA FIRST-CLASS MAIL AND EMAIL

Re: Comments on VRP Semiannual Reports 1, 2, and 3 and 2016 Corrective Action Completion Report
Macon MGP Site, HSI Site Number 10511
Macon, Georgia; Bibb County

Dear Mr. Corbett:

The Georgia Environmental Protection Division (EPD) is in receipt of VRP Semiannual Progress Reports 1, 2, and 3, dated December 8, 2015, May 29, 2016, and November 21, 2016, respectively, for the Macon MGP Site. We note that a Corrective Action Completion Report was included in Appendix A of Semiannual Report 2. The reports were submitted to EPD pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100. Our comments are provided below.

1. Based upon review of Section 2.5 and Appendix B in Semiannual Report 1, EPD will not require further evaluation of Ocmulgee River surface water, sediments, or river armoring associated with the Upper and Lower Outfall areas at this time. Environmental covenants restricting land use on site will need to include provisions for annual reporting to EPD on observed conditions in the river and specify conditions [e.g., significant rainfall (10-year event), construction activities in the river, dredging of the river, etc.] that could potentially disturb TLM or its overlying cover and would trigger a river bottom survey of the armored area associated with the Upper Outfall.
2. EPD is concerned about the potential for vapor intrusion into buildings at 230 and 280 7th Street, which adjoin the Mulberry MGP/Eastern Portion MGP on the southeast. DNAPL is present at MW-309D, which is a shallow bedrock well located on or next to the 230 7th Street property. Groundwater concentrations of benzene and naphthalene in bedrock wells immediately northeast of those buildings are high. Data is lacking on the quality of overlying alluvial groundwater in those areas. Accordingly, please do one of the following:
 - a. Collect soil-gas samples from several select locations next to the buildings' outer walls, then laboratory-analyze the samples for VOCs and SVOCs. If concentrations of VOCs or SVOCs are detected in the soil-gas samples, run the data through the EPA's VISL screening tool.
 - b. Install and sample additional alluvial monitoring wells on or next to the 230 and 280 7th Street properties. Laboratory-analyze the groundwater samples for VOCs and SVOCs. If

- concentrations of VOCS or SVOCs are detected in the groundwater samples, run the data through the EPA's VISL screening tool.
3. Given that the VEFR events have not been effective in remediating the DNAPL on site, combined with the possibility that VEFR could accelerate migration of or destabilize the dissolved contaminant plume, EPD will not require additional VEFR events at this time. However, if continued monitoring of MW-111D and MW-309D shows increasing thicknesses of DNAPL, or if site conditions otherwise dictate a more aggressive remedial approach, VEFR events may be required in the future.
 4. In lieu of removing additional bedrock well and sump installations from the remedial plan, as requested in Section 3.1.2 of Semiannual Report 3, EPD will temporarily suspend requirements for their installation, pending the collection of future groundwater monitoring data.
 5. Based upon historical analytical data, and as requested in Section 3.6.2.1 of Appendix B of Report 3, EPD will no longer require laboratory analysis for inorganics in alluvial wells.
 6. Based upon historical analytical data, and as requested in Section 3.6.2.2 of Appendix B of Report 3, EPD will no longer require laboratory analysis for inorganics in bedrock wells.

Atlanta Gas Light Company must address these comments 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 Atlanta Gas Light Company. However, failure of EPD to respond to a submittal within any timeframe does not relieve Atlanta Gas Light Company from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-3935.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Christie Battenhouse, Atlanta Gas Light Company
Adria Reimer, ERM