

October 31, 2017

**VIA EMAIL AND REGULAR MAIL**

Macon-Bibb County  
c/o The Honorable Mayor Robert Reichert  
700 Poplar Street  
P.O. Box 247  
Macon, Georgia 31202-0247

Re: Third VRP Semi-annual Progress Report, September 20, 2017  
Soil Management Plan, August 31, 2017  
Macon Former Manufactured Gas Plant 2, HSI Site No. 10692  
Intersection of Willow Street and Spring Street Lane, Macon-Bibb County  
Parcels R071-0316 (OC98-5J), R073-0033 (OC99-4A), and R073-0398 (OC99-4AB)  
Portions of Right-of-Way of Willow Street and Spring Street Lane

Dear Mayor Reichert:

The Georgia Environmental Protection Division (EPD) has received the above referenced Geotechnical & Environmental Consultants, Inc. (GEC) Soil Management Plan (SMP) dated August 31, 2017 and the Third Semiannual Progress Report (Progress Report) dated September 20, 2017, which were submitted for Macon-Bibb County (MBC) pursuant to the Georgia Voluntary Remediation Program Act (the Act). After completing a review of the above referenced documents, EPD offers the following comments:

**Third VIRP Semiannual Progress Report and Soil Management Plan**

1. EPD does not agree with the statements in Section 4.0 *Soil Excavation Plan* of the Progress Report and throughout the SMP that (1) excavation of impacted soil located beyond 15-feet below ground surface (bgs) is not required due to the depth of the impacts, and (2) the soils are not a threat to human health or the environment. The final paragraph on page 2 of the SMP states that "excavation of soils in these areas is not required, due to depth of the soils (no exposure pathway) and prior leachability studies, which confirm they do not represent a threat to human health or the environment". Please revise the SMP to indicate that a revised corrective action plan (CAP) will be developed, and a uniform environmental covenant (UEC) and revised consent order (CO) will be executed to address contamination below 15-feet bgs.
2. The certification statement provided in Section 6.0 of the Progress Report is signed and sealed by a professional engineer and professional geologist, but it is incomplete, and the document certification was omitted from the SMP. Please ensure that future certification

statements are presented as follows pursuant to Item 6.0 of the VIRP Application Form and Checklist:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

3. Sample location GB-28 should be listed for removal in Section 4.0 of the SMP rather than sample SB-28.
4. Section 4.0 of the SMP suggests the use of construction worker oversight/ air monitoring for the disturbance of soil below 15-feet bgs. Please note that appropriate precautions should be taken for all surface and subsurface excavation activities, and perimeter air monitoring and sampling should be conducted to demonstrate that the Property is not producing significant off-site impacts to air quality (i.e. airborne particulates and contaminants) and the surrounding population. Please ensure that a perimeter air monitoring and sampling program is initiated prior to and executed during excavation activities in accordance with applicable EPA and OSHA regulations.
5. EPD understands that GEC has estimated approximately 53 tons of contaminated soil will be removed at the 11 impacted soil locations. However, EPD recommends that GEC calculate the total volume of excavated material based on the entire soil column and incorporate this information into the SMP. Details along with supporting data should be provided regarding how the non-contaminated overburden will be managed. The table provided in the *Soil Excavation* section of the SMP should be revised accordingly.
6. The results of the soil removal action can be included in the final compliance status report (CSR) with a revised compliance certification rather than a Remedial Action Report as indicated in Section 9.0 of the SMP.

#### Response to EPD's June 23, 2017 Comments

Please note that Macon-Bibb County's responses to EPD Comments #1, 3, 5, 6, 8, and 9 have been satisfied in accordance with the Act. The following comments should be addressed in future progress reports and/ or the final CSR as appropriate:

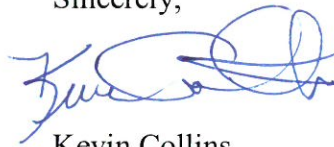
7. Comment #2.b – Please identify the specific areas within the RUTZ that will be the source of the fill material and provide existing data or collect additional samples to demonstrate that areas of the RUTZ are adequately characterized and acceptable for use as fill material.



8. Comment #4 – Please note that a revised CAP is still required to address impacted soil material that is located greater than 15-feet bgs in addition to the revised CO and draft UEC, as discussed above in Comment #1.
9. Comment #7 – The signed/sealed certification is not complete. Please see Comment #2 of the subject letter above.
10. Comment #10 – The conceptual site model (CSM) should be revised and updated in the progress reports as previously requested to prevent delays in the approval of the final CSR.

As next semiannual progress report is not due until December 22, 2017, EPD does not approve an extension for submittal of the next semiannual progress report at this time. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at (404) 657-0487.

Sincerely,



Kevin Collins  
Unit Coordinator  
Response and Remediation Program

c: GEC, Tom Driver, P.E. (via email)  
GEC, Carrie Holderfield, P.G. (via email)  
Smith, Welch, Webb & White, LLC, Andy Welch (via email)

File: HSI# 10692, ID# 259-0104

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