



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
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June 23, 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: Second Semiannual VIRP Progress Report, April 18, 2017
Response to EPD's October 24, 2016 Comments, December 7, 2016
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 October 24, 2016 Response to EPD Comments and Second Voluntary Remediation Program (VRP) Semiannual Progress Report (2nd Progress Report) submitted by Geotechnical & Environmental Consultants, Inc. (GEC) 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:

1. Section 4.0 of the 2nd Progress Report discusses a summary of previous investigation results; however, it does not include a complete list of the eleven (11) sample locations that require corrective action. Please ensure that all sample locations with regulated substances detected above applicable VRP cleanup criteria are discussed within the text of future reports, as stated in the response to EPD Comment #1 of the October 24, 2016 response letter.
2. Section 6.0 of the Progress Report describes the Soil Excavation Plan (SEP). Please note the following comments:
 - a. Approved Type 1 and Type 2 soil risk reduction standards (RRS) are applicable for further remediation of the Residential Use Target Zone (RUTZ) area.
 - b. The SEP proposes the use of backfill material from offsite sources and from within the RUTZ. Please provide new analytical data or reference existing data to demonstrate that all fill material complies with Type 1 and/ or Type 2 RRS.
 - c. According to the SEP any remediation/excavation activities will be performed in accordance with OSHA regulations and a site specific health and safety plan. It also

states that all samples will be collected and handled per appropriate protocols. Please note that all remediation/excavation, sampling and handling activities should be conducted in accordance with EPD Region 4 Field Branches Quality System and Technical Procedures (FBQSTP), which should be referenced in future reports.

3. EPD concurs with the proposed confirmatory sampling plan, which proposes one sample tested for every 20-linear feet of sidewall and one sample per every 500 to 1000 square-feet of the excavation base. Please note that EPD requires the following guidelines for confirmatory soil sampling. No fewer than five (5) verification samples will be required for each excavation sidewall: one sample per sidewall (total of 4 samples) and one sample per floor area. For each 20-linear feet sidewall sample area, one sample should be collected for every five (5) feet of depth within the zone of contamination.
4. EPD agrees with the October 24, 2016 response to EPD's Comment #2, which proposes to submit the requested draft uniform environmental covenant (UEC), revised consent order, soil management plan (SMP) and a corrective action plan (CAP) that details the requirements necessary for the disturbance of soil below 15-feet in the RUZT in the 3rd VRP Progress Report. As soil will be excavated to depths of approximately 15-feet below ground surface (bgs) during the soil excavation activities, the SMP *must be submitted prior to the initiation of excavation activities*, even if additional time is required for submittal of the next progress report. EPD recommends submittal and finalization of the revised consent order and draft UEC well in advance of the final CSR to prevent any undue delays in getting them executed and/ or filed as applicable.
5. Section 8.0 of the 2nd Progress Report provides a proposed schedule of VRP Activities. Prior to initiation of the proposed soil excavation activities, please submit a revised milestone schedule of VRP corrective action activities (Gantt style format preferred) to include detailed remediation activities from start-up to completion, submittal of semiannual progress reports, and the remaining generic milestones found in Section 5a through 5d of the VRP Application Form and Checklist. EPD noted the proposed expedited submittal of the final CSR by September 2017, but please note that June 22, 2020 remains effective as approved in EPD's June 22, 2015 VRP approval letter.
6. Please note that the final CSR should include separate figures that demonstrate compliance with Type 1 and/ or Type 2 soil RRS at existing impacted depth intervals from the surface to 15-feet bgs (i.e. 0-2 feet, 2-5 feet, etc.) for metals and PAHs.
7. While the Report included a monthly summary of hours invoiced with a description of services as required by Item #6 of the VRP Checklist, it did not include the signed and sealed professional certification. Please ensure that the certification is provided in all future reports.

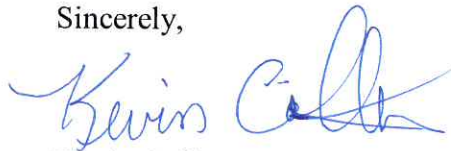
Response to EPD's August 24, 2016 Response Letter

8. Comment #3. A figure that depicts horizontal extent of soil impacts to the Type 1 or Type 2 RRS was not included in the 2nd Progress Report. Please ensure that the figure is included in all future progress reports and the final CSR.

9. Comment #6. The cross sections provided in the approved Williams Environmental, Inc. 2003 Compliance Status Report are not acceptable, as they depict property conditions (primarily groundwater) at the time that the CSR was finalized in 2003. Since soil conditions have been the focus subsequent investigations leading to the submittal of the current VRP Application and planned remediation, please provide revised cross sections as previously requested. The revised cross sections should include existing soil conditions (i.e. the 11 sample location that require remediation, Type 1/ Type 2 soil delineation sample locations, groundwater table elevation(s) if encountered, etc.).
10. Comment #7. Although an initial conceptual site model (CSM) with an assessment of the exposure pathways was presented in the approved January 9, 2015 GEC VIRP, Section 5 of the VRP Application Form and Checklist requires that the CSM be updated as investigation and remediation of the property progress, and it requires the inclusion of an up-to-date CSM in each progress status report. Therefore, please ensure that the CSM is updated and clearly states the status of all exposure pathways in future reports, rather than referencing previous reports and/ or correspondence per Section 5 of the VRP Application Form and Checklist.

The comments listed above should be addressed prior to commencement of soil excavation activities, or as deemed applicable within future progress reports and the final CSR. Please note that the next semiannual report is scheduled to be submitted by July 31, 2017. 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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