

Georgia Department of Natural Resources

Environmental Protection Division

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Judson H. Turner, Director

Land Protection Branch

Keith M. Bentley, Branch Chief

Reply To:

Response and Remediation Program
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November 2, 2012

FILE COPY

VIA E-MAIL AND REGULAR MAIL

Georgia Ports Authority
c/o Mr. Christopher B. Novack, P.E.
Director of Engineering & Facilities Maintenance
P.O. Box 2406
Savannah, Georgia 31402

Re: Voluntary Investigation and Remediation Plan (VIRP) and Application, July 25, 2012
Comment letter
Georgia Ports Authority-Bainbridge Terminal, HSI Site No. 10071
1321 Spring Creek Road
Land Lot 373, Parcels: 20, 21A, and portion of Parcel 19

Dear Mr. Novack:

The Georgia Environmental Protection Division (EPD) has reviewed the July 25, 2012 Voluntary Investigation and Remediation Plan (VIRP) submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). As part of the VIRP review, EPD also reviewed the April 2012 First Annual Groundwater Monitoring Report. EPD has noted the following concerns that will need to be addressed:

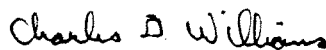
1. Groundwater concentrations on Agrium parcel 19 exceed cleanup standards in the vicinity of MW-20 and MW-21 and possibly further south on the parcel. EPD encourages Georgia Ports Authority (GPA) to work with Agrium to include impacted areas of Parcel 19 as qualifying property under the Act.
2. Based on our review of the VIRP and EPD's files, we have determined that Parcel 18 is not eligible as a qualifying property under Section 12-8-105(1) of the Act. This is because the parcel is not listed on the Hazardous Site Inventory and no documentation of a release of regulated substances on the parcel has been provided to EPD.
3. Section 2.4.1 of the application states that the downgradient edge of the dissolved BHC plume is contained within the GPA property. EPA does not concur with this statement as there is no evidence that the contaminant plume does not enter the Flint River. In fact, wells MW-17 and MW-12 appear to be side gradient of the center of the BHC plume and are not representative of the leading edge. Additionally, since there is no evidence that the plume is contained within the GPA property; the immediate down-gradient receptor for the site would be the Flint River.
4. Section 3.2 of the application asserts that additional investigation is needed to determine the true mechanism that attenuates pesticide contaminants in groundwater. In section 4.1.3, GPA indicates that MNA is the practical remedial strategy and proposes to monitor indicator parameters. As the BHC degradation pathway does not follow the degradation pathway for most chlorinated solvents, a different set of MNA indicator parameters may be needed to evaluate MNA as a viable option. Please provide additional details on what indicator parameters may be appropriate to show that attenuation is occurring including possible metabolites for BHC as described previously in the 2009 Corrective Action Plan.
5. Section 2.2.2 states that horizontal groundwater delineation is complete except to the North. However, delineation has also not been completed west of MW-13 as demonstrated by the dashed lines on the August 2009 isoconcentration maps.

6. Groundwater samples collected in September of 2001 (refer to MACTEC's December 3, 2002 Addendum to Revised Compliance Status Report) appear to indicate that there has not been a release of metals in groundwater on the qualifying property. Therefore, the additional investigation/delineation of metals proposed in the VIRP is not required unless GPA has reason to believe that metals contamination exists.
7. Table 2 of the 2012 Groundwater Monitoring Report and Table 2-6 of the VIRP have j-flags for many of the April 2012 beta-BHC detections even though the detections were not flagged by the laboratory. Please explain this discrepancy or remove these j-flags from future tables.
8. Section 2.2.1 states that soil on the North parcel has been remediated to below Type 4 risk reduction standards (RRS) and that soil contamination has been horizontally delineated on site. However, EPD has been unable to concur with the conclusion as detailed in our May 2, 2011 and December 30, 2011 response letters. Please respond to Comments 1 and 9 of the May 2, 2011 letter by the second Progress Report to address these deficiencies (note that the required delineation figure(s) may use Type 1 risk reduction standards (RRS) in lieu of background as allowed by the Act). Also, please submit a copy of the laboratory analytical results for soil samples collected at MW-22.
9. Section 4.3 proposes soil removal in area of concern (AOC) 3, unless there is no risk of migration to surface waters. However, that exceedance must be excavated or otherwise addressed, regardless, since there are no proposed controls for that area.
10. Figure 4-1 shows the location of the proposed fencing to control exposure to contaminated soils within AOC-1. However, the fencing does not encompass all known RRS exceedances. Please adjust proposed fencing or explain in future progress reports.
11. Most of the soil samples collected in AOC-2 exceeded RRS. Therefore, additional soil sampling may be necessary to determine the appropriate boundaries for the proposed engineering and institutional controls.
12. As a reminder, EPD's December 30, 2011 letter stated that future samples collected for purposes of soil delineation at the site should be grab samples rather than composite samples. Composite samples are acceptable for analyzing waste piles for proper disposal, and grab samples that are representative of discrete sample depths are appropriate for demonstration of the definition of the extent of contamination.

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 Georgia Ports Authority. However, failure of EPD to respond to a submittal within any timeframe does not relieve Georgia Ports Authority from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Montague McPherson at (404) 657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Raj Mahadevaiah – Environmental International Corporation

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