

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

February 16, 2016

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: Sixth VIRP Semi-Annual Progress Report
Georgia Ports Authority-Bainbridge Terminal, HSI Site No. 10071
1321 Spring Creek Road, Bainbridge, Decatur County

Dear Mr. Novack:

The Georgia Environmental Protection Division (EPD) has reviewed the Sixth Voluntary Investigation and Remediation Plan (VIRP) Semi-Annual Progress Report dated November 2, 2016. EPD has developed the following comments which should be addressed in accordance with the Act:

1. EPD concurs that since the Universal Environmental Covenant (UEC) has been expanded to include the AOC 2 area and has been extended to include all concrete and asphalt covered surfaces surrounding Warehouses 2 and 3, including up to the fence installed around AOC 1, no further horizontal delineation is required.
2. EPD, as previously stated in the October 6, 2015 comment letter concurs that delineation is incomplete near the Flint River where MW-13 and MW -23 are located. EPD will await the Georgia Ports Authority (GPA) modeling demonstration (in a proposed meeting by GPA that no negative surface water impacts or exceedances of the current Georgia In Stream Water Quality Standards (ISWQSs), as provided in Section 391-3-6-.03(5) of the Georgia Water Quality Control Act, are occurring into the Flint River.
3. In response to EPD's Comment # 6 in the October 6, 2015 comment letter, GPA stated that they do not plan to include Agrium parcels under a groundwater UEC. However, GPA has historically stored pesticides on its property and cannot exempt itself from being a Responsible Party for the release of pesticides on the property. EPD believes that since Agrium did not have a history of using or storing pesticides as part of their business operations, Agrium parcels with pesticide impacts in groundwater should be included as qualifying properties under the Act and a streamlined groundwater UEC be developed for these parcels as part of the final site remedy.
4. EPD noted that there were no turbidity readings of monitoring wells sampled and the pump intake readings were too low on most wells during sampling. In future Reports please submit turbidity readings for each monitoring well sampled and make appropriate adjustments to correct the low intake readings.

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

EPD anticipates receipt of the next Semi-Annual VIRP Progress report no later than October 31, 2016. Should you have any questions, please contact Montague McPherson at (404) 657-8600.

Sincerely,



Robin Futch, P.G.
Acting Unit Coordinator
Response and Remediation Program

c: Raj Mahadevaiah – Environmental International Corporation

File: HSI No. 10071

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