



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

August 22, 2018

Via U.S. Mail

And Email: candersen@transcoinc.com

Transco, Inc.
c/o Charles Andersen, CEO
200 North LaSalle Street, Suite 1550
Chicago, Illinois 60601

Subject: EPD Comments
Voluntary Remediation Program Application dated November 14, 2017
2016 Corrective Action Progress Report dated January 12, 2017
Former Transco Railcar Facility, HSI Site No. 10502
861 Seventh Street, Macon, Bibb County, GA

Dear Mr. Andersen:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated November 14, 2017 and the 2016 Corrective Action Progress Report dated January 12, 2017. The VIRP was submitted by Transco, Inc. (Transco) as an application for enrollment in the Voluntary Remediation Program (VRP) for the referenced site. EPD has the following comments separated based on the applicable document:

Comments related to the VIRP:

1. Section 1.1 indicates that a warranty deed is provided in Appendix B. However, a warranty deed was not included with the application. Please submit a warranty deed with the first semi-annual progress report.
2. The qualifying property address is identified as 989 Seventh Street; however, the HSI listing and the tax parcel map shown in Appendix B identify the street address as 861 Seventh Street.
3. The VRP Application applies to tax parcel ID R0810091OC 79. However, historical impacts extend beyond the parcel boundary to include the adjacent Norfolk Southern Property and Public Utility owned properties. Adding these parcels to the list of additional qualifying properties may be necessary if they are to be addressed under the VRP.
4. LNAPL transmissivity, measured at each extraction well, should be used as a metric to assess the practicality of free product recovery. Quantitative methods (e.g. calculations using baildown testing, manual skimming, or system recovery evaluations, etc.) should be applied at each extraction point as described in ITRC's LNAPL Guidance. As LNAPL transmissivity varies over time, revised values will need to be submitted.

5. Large fluctuations in water table elevations and LNAPL thicknesses are observed in the extraction wells. Based on figures provided in Section 3.4.2, seasonal water levels on-site vary by over 48 inches. This interval is larger than the vertical travel for the typical SPG skimmer. When water levels rise above the skimmer intake it may be possible to recover water as opposed to LNAPL. As remediation system components have likely been repaired and replaced over time, please provide a detailed description of the current system components deployed in each extraction well. This should include extraction method, extraction well screen interval, and LNAPL intake settings, where applicable.
6. Section 3.4.3.3 indicates that an updated assessment of dissolved LNAPL constituents will be included as part of the proposed remediation plan. However, additional groundwater sampling events were not included in the milestone schedule. Given the large seasonal variations in water levels, at least two semi-annual groundwater sampling events should be completed with samples analyzed for the full VOC and SVOC target compound list and PCBs.
7. While not mentioned in the VIRP, EPD anticipates the receipt of a fate and transport model for the chlorinated solvent plume and dissolved LNAPL plume.
8. While not specified in the VIRP, a hypothetical point of exposure (POE) and point of demonstration (POD) should be identified for each plume.
9. Following the next groundwater sampling event, please provide a summary table with applicable RRSs, supporting calculations, and references for all detected compounds in groundwater.

Comments related to the 2016 Corrective Action Progress Report:

1. Based on EPDs review of the lead excavation data presented in Figure 3.3, several data gaps are present where confirmation samples are missing. However, the exposure assessment and area averaging proposed in the VIRP may eliminate the need for additional sampling to demonstrate compliance. EPD will withhold comment on these data gaps until the area averaging results are received and reviewed.
2. Several areas remain with surface soil (0-2') in excess of the established RRS (1,300 mg/kg). As described in the VIRP, an exposure assessment with area averaging is proposed to address these impacts. EPD will withhold comment on the soil lead excavation until the area averaging results are received and reviewed.
3. Several perimeter samples exceed applicable RRS. Please note that area averaging cannot be used to meet lateral delineation requirements. Delineation activities must be completed to the delineation criteria provided under the VRP Act.

The above comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards, and policies of the VRP Act. EPD may, at its sole discretion, review and comment on documents submitted by Transco. However, failure of EPD to respond to a submittal within any timeframe does not relieve Transco from complying with the provisions, purposes, standards, and policies of the Act.

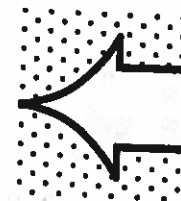
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Please address the comments listed above in the first VRP semiannual progress report, or as otherwise appropriate, which should be submitted to EPD by February 22, 2018. If you have any questions, please contact Michael Smilley of the Response and Remediation Program at 404-463-0530.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program



c: Kirk Kessler, P.G., EPS, Inc. (via email: kkessler@envplanning.com)
File: 259-0100 (VRP)

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