



January 31, 2018

Atlanta Gas Light Company
c/o Mr. Greg Corbett
Director of Environment & Sustainability
Ten Peachtree Place
Atlanta, Georgia 30309

VIA FIRST-CLASS MAIL AND EMAIL

Re: Comments on 2017 Annual CAMP Report
Rome MGP Site, HSI Site Number 10109 (delisted)
Rome, Georgia; Floyd County

Dear Mr. Corbett:

The Georgia Environmental Protection Division (EPD) is in receipt of the above-referenced report. Having completed our review, we find that the photographs included within the 2017 report are the same photographs included in the 2016 report. We note that each of the photographs within the 2017 report has an accompanying photograph date of August 18, 2017 (sometimes with different notes in the description) and were presumably taken by the inspector, Aubrey Ellis. These same photos were used in the 2016 report with an inspection date of August 2, 2106.

The August 2014 Continuing Action Monitoring Plan (CAMP), which is referenced in four court-recorded Uniform Environmental Covenants (UECs) associated with the Rome MGP site requires annual inspections to be conducted and reported to EPD. Failure to conduct those annual site inspections would constitute a violation of the CAMP and the associated UEC for each tax parcel. Accordingly:

1. Please provide EPD with current photographs that were taken during the August 2017 site inspection (and include electronic versions of the photos that support the date that the inspection took place), or
2. Provide EPD with other proof that the August 2017 site inspection was actually conducted.

In addition, the following certification statement, contained in other EPD annual certification forms, must be included in all future CAMP reports and signed by an authorized person for AGL Resources:

“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.”

The 2017 photographic documentation or other proof of a 2017 annual inspection must be submitted to EPD by March 2, 2018. If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-3935.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c (via email): Christie Battenhouse, Atlanta Gas Light Company