



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

May 31, 2018

Colonial Terminals, Inc.
c/o Mr. Jim Baker
Manager, Environmental Compliance
Colonial, Inc.
PO Box 576
Savannah, GA 31402

Exxon Mobil Corp.
c/o Dave Roberson, P.E.
de maximis, inc.
2203 Timberloch Place, STE #213
The Woodlands, TX 77380

Estech, Inc.
c/o Mr. Thomas C. McGowan
McGrath, North, Mullin & Kratz, PC LLO
1601 Dodge Street STE 3700
Omaha, NE 68102

Re: De Minimis Demonstration of Potential BOD Impacts in Savannah River
Colonial Terminals Plant #2, HSI #10098
Savannah, Chatham County

Dear Messrs. Baker, Roberson, and McGowan:

The Environmental Protection Division (EPD) has completed its review of the report, De Minimis Demonstration As Per Obligation Under the Voluntary Remediation Program (VRP), received February 7, 2018, and the subsequent presentation of February 12, 2018, and following material dated March 20, 2018 in regard to the Colonial Terminals Plant #2, in Savannah, Chatham County, Georgia.

Colonial's reports and presentation (hereinafter, the De Minimis Demonstration) were intended to address EPD concerns expressed in previous correspondence, particularly EPD's November 14, 2017 letter to Colonial. After review of the De Minimis Demonstration, EPD notes that Colonial performed only a 72-hour biochemical oxygen demand (BOD) test instead of an extended Ultimate BOD test as requested by EPD. However, despite that change EPD finds no other reason to suggest that Colonial would exhibit a dissolved oxygen (DO) impact greater than the De Minimis threshold. Therefore, EPD accepts the De Minimis Demonstration and no further data is needed to address potential DO impacts to the Savannah River.

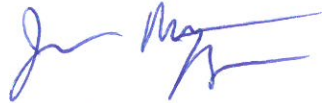
Since the BOD issue has been resolved, please submit a final VRP Compliance Status Report (CSR) as required under O.C.G.A. §12-8-107(e) by September 1, 2018. Please also include a Monitoring and Maintenance Plan, either separately or as an Appendix to the CSR, with site-specific land disturbance requirements to address subsurface soil compliance (see Item No. 6 in EPD's February 16, 2016 letter). Additionally, as mentioned in Item No. 7 of EPD's February

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2016 letter, please provide a description of the City of Savannah's corrective action of soil performed as part of the Westside Flood Relief Project Drain as part of the final CSR.

If you should have any questions regarding this correspondence, please contact Tom Brodell at (404) 652-7891.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: Elizabeth Booth, EPD, Watershed Protection Branch
Jeff Margolin, Ramboll Environ <jmargolin@ramboll.com>
Gerald L. Pouncey, Morris Manning & Martin, LLP <gpouncey@mmlaw.com>

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