

Georgia Department of Natural Resources
Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

July 2, 2014

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: First, Second, and Third VIRP Semi-Annual Progress Reports
Groundwater Monitoring 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 First, Second and Third Voluntary Investigation and Remediation Plan (VIRP) Semi-Annual Progress Reports and a Groundwater Monitoring Report dated May 9, 2013, October 30, 2013, April 30, 2014, and February 20, 2013, respectively. EPD has noted the following concerns that should be addressed in accordance with the Voluntary Remediation Program Act:

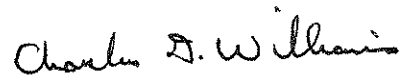
1. EPD concurs the soils are delineated in area AOC 3 and that it is currently not an area of concern.
2. EPD concurs that the soil contamination immediately north of AOC 2 is delineated. However, the extent of soil exceedances has not been determined to the south and should be addressed in future reports. EPD recommends that AOC 2 be expanded to the east to include the adjacent railroad tracks and to the south and west to abut the AOC 1 fence line.
3. Georgia Ports Authority (GPA) stated in their Second VIRP Progress Report that EIC is awaiting back-up documentation to address Comment #8 in EPD's comment letter dated November 2, 2012. However, this issue was not addressed in the Third VIRP Progress Report.
4. EPD concurs that vertical delineation is satisfied by MW-14 in accordance with item 5.c. of the VIRP Checklist.
5. Figure 4-5 and Table 4-3 indicate MW-13 was dry and was not sampled in the December 2013 sampling event. This well has historically exceeded risk reduction standards for beta-BHC whenever sampling was possible. Therefore, delineation west of MW-13 is not complete as noted in Comment 5 of our November 2, 2012 letter. Note that horizontal delineation on GPA property was to be completed by November 2, 2013 in accordance with the VIRP checklist. Please include historical data for MW-13 in future Groundwater Data Summary tables.
6. GPA has presented evidence that a source of groundwater contamination exists upgradient of the GPA property and proposes to provide more detail in an updated conceptual site model in the next semi-annual report. While EPD does concur with this analysis, we do not concur with the implications in the reports that all pesticide and sulfate groundwater detections are from upgradient sources. We suspect multiple sources both on and off the GPA property.

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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.

Please address the above comments in the next semi-annual report, which should be submitted by November 2, 2014. If you have any questions, please contact Montague M^cPherson at (404) 657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Raj Mahadevaiah – Environmental International Corporation

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