

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

October 6, 2015

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

MAILED
10-6-2015

Re: Fourth and Fifth VIRP Semi-Annual Progress Reports
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 Fourth and Fifth Voluntary Investigation and Remediation Plan (VIRP) Semi-Annual Progress Reports dated October 30, 2014 and May 4, 2015, respectively. EPD has noted the following concerns that should be addressed in accordance with the Voluntary Remediation Program Act:

Soils:

1. EPD concurs that the North Parcel has been remediated and meets Type 4 risk reduction standards (RRS). EPD is in the process of evaluating Georgia Gulf Sulfur's response from a previous EPD request that soil and groundwater data be provided for the area north of the road on their property to complete delineation to the north.
2. Laboratory analytical results for soil samples collected at MW-22 were not submitted in the previous or current Progress Reports as requested in Comment # 8 of EPD's November 2, 2012 comment letter; please submit these results.
3. Figure 4-1 in the 5th VIRP Progress Report – The southwest portion of warehouse 3 in AOC 2 at location NW-SB-06 has not been horizontally delineated for alpha, beta and delta-BHC. However, as discussed in the August 25, 2015 meeting, further horizontal delineation may not be required if the Uniform Environmental Covenant (UEC) extends and defines the area subject to engineering controls (ECs) and institutional controls (ICs) as all concrete covered areas surrounding the exterior of the warehouses up to the fence installed around AOC 1. This area would need to be defined in a surveyed legal description, defined in the UEC and subject to annual Maintenance and Monitoring inspections and reporting.

Groundwater:

4. In both reports, EPD has noted that MW-13 and newly installed well MW-23 have exceedances above Type 4 RRS for beta-BHC and concurs that delineation is not completed in this area near the Flint River. To demonstrate 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 in the Flint River, site-specific mixing zone calculations should be developed that show the maximum concentrations in the plume predicted to reach the Flint River. The source concentration that might be used in the mixing zone calculations could be the same

maximum concentration for beta BHC (5,000 ug/L) that has been used in the Analytical Contaminant Transport Analysis System (ACTS) modeling, or a more representative value.

5. EPD does not agree with the plumes drawn in Figures 3-6 (March 2014), Figure 3-7 (September 2014) and Figure 6-4 (May 2015) for the beta-BHC plume. These data do not represent two distinct plumes and the isoconcentration contours should be drawn as one plume.
6. Based on Comment # 1 in EPD's November 2, 2012 letter and subsequent to discussions during the August 25, 2015 meeting, consideration should be given to including Agrium parcels with pesticide impacts in groundwater as qualifying properties under the Act and a streamlined groundwater UEC be developed for these parcels as part of the final site remedy.

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 30, 2015. As discussed in the August 25, 2015 meeting, GPA will proceed with the development of the UEC and associated Monitoring and Maintenance Plan for the Property, and may also change over to annual groundwater monitoring along with the submittal of semi-annual VIRP progress reports. Should you have any questions, please contact Montague McPherson at (404) 657-8600.

Sincerely,



Jason Metzger
Acting Program Manager
Response and Remediation Program

c: Raj Mahadevaiah – Environmental International Corporation

File: HSI No. 10071

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