



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

October 24, 2016

VIA EMAIL AND REGULAR MAIL

Macon-Bibb County
c/o The Honorable Mayor Robert Reichert
700 Poplar Street
P.O. Box 247
Macon, Georgia 31202-0247

Re: Voluntary Remediation Program First Semiannual Progress Report, March 10, 2016
Macon Former Manufactured Gas Plant 2, HSI Site No. 10692
Intersection of Willow Street and Spring Street Lane, Macon-Bibb County
Parcels R071-0316 (OC98-5J), R073-0033 (OC99-4A), and R073-0398 (OC99-4AB)
Portions of Right-of-Way of Willow Street and Spring Street Lane

Dear Mayor Reichert:

The Georgia Environmental Protection Division (EPD) is in receipt of the August 1, 2016 Voluntary Remediation Program (VRP) First Semiannual Progress Report (Report) submitted by Geotechnical & Environmental Consultants, Inc. (GEC) for Macon-Bibb County (MBC) pursuant to the Georgia Voluntary Remediation Program Act (the Act). The Report provides further details for the implementation of the May 22, 2015 Voluntary Investigation Remediation Plan (VIRP), which was approved by EPD in a letter dated June 22, 2015. According to the Report, MBC is changing future use of the previously certified Type 4 onsite area from nonresidential to residential per the approved May 22, 2015 VIRP. The Report includes additional soil characterization of the extent of contamination in the top 15-feet of the Residential Use Target Zone (RUTZ) along with recommendations for further actions including excavation, development of a Soil Management Plan (SMP), enacting a uniform environmental covenant (UEC), and corrective action plan (CAP) for soil greater than 15-feet in the RUTZ area. After completing a review of the Report, EPD offers the following comments:

1. As stated above, the Report proposes excavation and proper disposal of metals and polychlorinated hydrocarbon (PAH) contaminated soil detected at concentrations that exceed residential Type 1 and Type 2 risk reduction standards (RRS) in the top 5-feet of soil at the above referenced property and the use of a SMP, CAP, revised Consent Order, and UEC to address contamination located greater than 5-feet below ground surface (bgs). EPD and MBC representatives discussed the actions proposed in the Report in telephone conversations held on October 7, 18, and 19, 2016. Based on these discussions, it was established that MBC will not implement the area averaging approach detailed in the Report at the property. MBC representatives also cited the potential of excavation and disposal of impacted soil in the top *15-feet* of soil at the property pending MBC's approval, which will be discussed in a

County Commissioners meeting to be held in the 4th Quarter of 2016. Therefore, EPD will not comment on the area averaging approach that was provided in the Report at this time. Please submit a revised remediation plan that reflects the referenced modifications in the next semiannual progress report. Based on a review of the Report and the noted communications with MBC, EPD has concluded that the area averaging approach is not required to meet remedial goals in the ground surface to 5-foot bgs horizon, as soil remaining in place after the excavation activities will be eligible for certification to residential RRS.

2. Section 8.0 of the Report provides conclusions and recommendations for the path forward at the property. EPD approves the request for use of previously approved Type 2 soil RRS in the RUTZ but requests that the RRS that are presented in the COC Decision Matrix be reviewed for accuracy. EPD also agrees with MBC's request to submit a draft UEC to be used in conjunction with a SMP, CAP and revised Consent Order to enforce restrictions for soils located greater than 15-foot bgs in the RUTZ. Please submit the SMP, CAP, and a draft UEC as part of the next semiannual progress report. The next report should also include a Soil Excavation Plan that provides essential details about the soil excavation activities (i.e. grid spacing, a verification sampling strategy, soil sampling procedures, etc.).
3. According to the Report, the soil impacts at the property have been delineated horizontally and vertically. Please provide a figure in the next semiannual progress report that illustrates delineation to the approved Type 1 RRS, and please note that a final figure that demonstrates overall soil compliance should be submitted in the final Compliance Status Report (CSR).
4. Section 3.0 of the Report states that groundwater was certified to be in compliance with Type 1 RRS in the Williams Environmental Services, Inc. 2003 CSR; however, it did not discuss the potential for leaching of contamination from soil to groundwater in those areas where contaminated soil may be left in place. Please provide a statement with regard to leaching in the next progress report.
5. Section 5.0 of the Report provides the results of a vapor intrusion investigation in the vicinity of the Former Gas Holder No. 1 and Former Gas Holder No. 2. EPD agrees with the conclusion that based on the calculations, all COCs were detected below the target risk for carcinogens and/ or the target hazard quotient for non-carcinogens.
6. Additional soil samples have been collected since EPD's approval of the 2003 CSR; therefore, please provide revised cross sections in the next progress report to illustrate the site's surface and subsurface setting (Unified Soil Classification System subsurface soil descriptions and any interconnecting lithologic characteristics) to support the graphic three dimensional conceptual site model as required by Item #5 of the VRP Checklist.
7. A discussion of the property's conceptual site model (CSM) including exposure pathways was not included in the Report. Additionally, the Report did not include a schedule of VIRP activities, including the submittal of semiannual progress reports and a final CSR. Please ensure that an updated CSM and VIRP schedule of activities are included in all future progress reports.

Macon-Bibb County

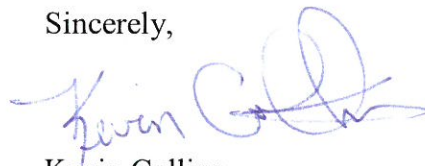
October 24, 2016

Page 3 of 3

8. While the Report was stamped by a Professional Engineer, it did not include the signed and sealed professional certification and supporting documentation (i.e. monthly summary of hours invoiced with a description of services provided), as required by Item #6 of the VRP Checklist. Please ensure that the information is provided in all future reports.

The comments listed above should be addressed prior to commencement of soil excavation activities, in future progress reports or the final CSR, as appropriate. The next semiannual report should be submitted by December 22, 2016. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at (404) 657-0487.

Sincerely,



Kevin Collins
Unit Coordinator
Response and Remediation Program

- c: GEC, Tom Driver, P.E. (via email)
GEC, Carrie Holderfield, P.G. (via email)
Smith, Welch, Webb & White, LLC, Andy Welch (via email)

File: HSI# 10692

S:\RDRIVE\ANTONIA\Macon Former MGP2\VRP\1stVRPSAPR_24October2016.doc