

# Holley Consultants, Inc.

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September 19, 2018

Mr. Jason Metzger  
Program Manager  
Response & Remediation Program  
Land Protection Branch  
Georgia Environmental Protection Division  
2 Martin Luther King Jr. Drive, SE, Suite 1462  
Atlanta, Georgia 30334



Re: Voluntary Remediation Program Eleventh Semi-Annual Status Update  
CSX Transportation, Inc.  
DePriest Signal Shop (HSI #10611)  
641 East Liberty Street  
Savannah, Chatham County, Georgia  
Tax Parcel ID#2-0033-12-001

Dear Mr. Metzger:

The following report is submitted in accordance with requirements of the Voluntary Remediation Program. This site was accepted into the program on March 15, 2013.

The third semi-annual status update was submitted on August 28, 2014. It included revisions to risk reduction standards using updated toxicity values. Four regulated substances exceeded applicable risk reduction standards in some locations. For these substances, revised exposure point concentrations were calculated using area averaging techniques. The calculations showed that all regulated substances met applicable risk reduction standards across the site. Even though the area averaging approach showed that no further action was called for, CSXT proposed to remove soils in a limited area in which higher concentrations were observed.

Comments were received from Georgia EPD by letter dated June 21, 2017. Revisions were requested with respect to area averaging, risk reduction standards, and drawings. These comments were addressed in the ninth semi-annual report submitted on September 12, 2017. No comments from Georgia EPD have been received on the ninth semi-annual report. In lieu of comments, CSXT has not taken further action at the site beyond general project management tasks.

As noted in the March 15, 2013, VRP approval letter from Mr. Charles Williams, GAEPD Program Manager, CSX is required to submit a Compliance Status Report by March 15, 2018. CSX is unable to complete the VRP requirements within this five-year timeframe due to delayed review and concurrence, but is prepared to proceed expeditiously when Georgia EPD approvals are obtained.

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Professional hours charged to the project consist of one (1) hour expended in September 2018.

Sincerely,



Ronald E. Holley, P.E.

cc: Matt Adkins, CSXT

Professional Engineer Certification

*I certify under penalty of law that this report and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, et. seq.). I am a professional engineer who is registered with the Georgia State Board of Registration for Professional Engineers and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances.*

*Furthermore, to document my direct oversight of the Voluntary Remediation Plan development, implementation of corrective action, and long term monitoring, I have included a monthly summary of hours invoiced and a description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division.*

*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.*



September 19, 2018

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Ronald E. Holley, P.E.

Date

Georgia Registration 16507