

**Georgia Department of Natural Resources**  
**Environmental Protection Division**

**Reply To:**  
Response and Remediation Program  
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Judson H. Turner, Director  
Land Protection Branch  
Phone: 404/656-7802 FAX: 404/651-9425

September 23, 2014

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

Exxon-Mobil Corp  
c/o Mr. Mike Skinner  
Michael J. Skinner Consulting,  
LLC  
230 Kings Highway East, #300  
Haddonfield, NJ 08033

Estech, Inc.  
c/o Mr. Thomas C. McGowan  
McGrath, North, Mullin & Kratz,  
PC LLO  
Suite 3700 First National Tower  
1601 Dodge Street  
Omaha, NB 6810

**VIA EMAIL & REGULAR MAIL**

Re: 2013-2014 Voluntary Remediation Program (VRP) Documents  
Colonial Terminals Plant #2 (HSI # 10098)  
Savannah, Chatham County, Georgia  
Tax Parcel ID #s: 1-0549-01-002, 1-0549-01-002A, 1-0550-02-004

Dear Messrs. Baker, Skinner, and McGowan:

The Georgia Environmental Protection Division (EPD) has received the following reports that have been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by the Environ on behalf of Colonial Terminals Inc. (Colonial):

- May 30, 2014, Semi-Annual Progress Report No. 2
- September 6, 2013, "Response to GA EPD's Comments on the November 2012 VRP Application"
- December 2, 2013, Semi-Annual Progress Report No. 1
- April 9, 2013, SVE Status Report and Discontinuation of SVE System

After completing a review of these reports, EPD has prepared the following comments:

- 1) According to the above referenced VRP documents, existing site data was utilized in a geostatistical modeling approach (Kriging) to predict the extent of free phase source material within the groundwater at the site. Please note that EPD will require additional time in order to evaluate the conclusions associated with the CTech EVS Pro geostatistical model, as EPD does not have equivalent geostatistical software at our disposal. Actions are being taken to acquire equivalent software, which should allow us to complete our evaluation prior to the next semi-annual report submittal. Even though EPD has not concurred with the projected extent of free phase source material, we would recommend that the next Progress Report include the proposal(s) for the remedial action(s) associated with the identified source material(s).

- 2) According to the 2013-2014 semi-annual reports for the site, the surface water samples continue to be collected a significant distance from the bank of the river. Please note that the data provided within the above referenced VRP documents is not sufficient to demonstrate these sample locations provide data representative of the conditions of surface water at the most probable point of shallow groundwater discharge to the Savannah River. Therefore, EPD continues to request that future surface water samples are collected in close proximity to the bank of the river during normal river flow conditions.
- 3) According to the 2013 Response, an updated Tax Parcel Location Map was to be included with the November 2013 VRP Progress Report with tax parcel information and property owner information for the abutting properties, and any "right-of-way" easements that are listed in the Appendix A Legal Description and Warranty Deed information for the site. Please include this updated figure in the next semi-annual progress report submittal.

Area Averaging & Risk Reduction Standards (RRS) Comments:

- 4) Pursuant to the VRP Act, the UEC, and per discussions between EPD and site representatives during the October 1, 2013, meeting, EPD is willing to accept the proposition that the site will not meet residential/non-residential compliance standards for soils greater than 2-feet below ground surface based on leaching potential in consideration of a proposed Type 5 compliance standard for soil greater than 2-feet by demonstrating that the concentrations leached into the groundwater will not result in an impact to the point of exposure, i.e. the Savannah River. EPD will defer concurrence with the Type 5 compliance standard until the demonstration of surface water conditions is complete.
- 5) According to the above referenced VRP documents, UCL's were calculated to estimate "more representative exposure point concentrations (EPC)" to demonstrate compliance with a proposed Type 5 area averaging approach for a single exposure domain (ED) encompassing the entire site. Colonial also indicated that an area averaging approach will be used not only for surface soils, but also for subsurface soils (2-10 feet below ground surface). EPD concurs with the proposed ED for surface soils, however, please note that area averaging should not be applied to subsurface soils as the exposure scenarios to subsurface soils, and resulting cleanup criteria, are not based on random exposure to these soils over the entire ED but rather specific exposure scenarios such as construction/utility worker and leaching based determinations. Therefore, please ensure that the subsurface data set is removed from the area averaging calculations, and that a not to exceed value is utilized for these subsurface soils. Please note that corrective action associated with subsurface soil exceedances, as long as the cleanup value is not a leaching based value dependent upon protection of a groundwater/surface water receptor, can typically be addressed through the site specific Uniform Environmental Covenant (UEC).
- 6) As supporting documentation for the use of a single ED, please provide EPD with a soil sampling rationale to demonstrate that a sufficient amount of surface soil samples have been, or will be, collected in order to develop a data set that is representative of the entire ED for all of the constituents of concern. Please note that based on the locations of the soil samples illustrated in Figure 5 of the November 2013 Report, many of the locations are concentrated in and around previously established impact areas and not randomly distributed throughout the ED.

VRP Documents

Colonial Terminals Plant #2, HSI Site #10098

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- 7) Based on the placement of a site related UEC and pursuant to the discussions between EPD and site representatives during the October 1, 2013, meeting, EPD concurs that an evaluation of a trespasser receptor is not required at this time. However, EPD recommends that specific language be added to the text that states a trespasser scenario was not evaluated due to the risk of other receptors, such as the commercial/industrial worker being protective of this receptor scenario. As for the commercial/industrial worker, utility worker and construction worker evaluation, the exposure frequencies for these receptors should be 250 days/year, 5 days/year, and 90 days/year respectively.

Should you have any question or concerns, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: Jeff Margolin, Environ

File: HSI# 10098

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