

Georgia Department of Natural Resources
Environmental Protection Division

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July 16, 2015

VIA EMAIL & REGULAR MAIL

Mr. Jim Schaeffer
McKenzie Tank Lines
975 Appleyard Drive
Tallahassee, Florida 32304

Re: Voluntary Remediation Program Progress Reports
McKenzie Tank Lines Site, HSI# 10406
Port Wentworth, Chatham County, Georgia
Tax Parcel ID #s 1-0729-01-007 & 1-0729-01-009

Dear Mr. Schaeffer:

The Georgia Environmental Protection Division (EPD) has received the November 19, 2014, and May 18, 2015, Voluntary Remediation Program (VRP) Progress Reports 1 & 2, submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by the Environmental International Corporation (EIC) on behalf of McKenzie Tank Lines (MTL). After completing its review of these referenced reports, EPD has prepared the following comments:

- 1) Responses to EPD's May 20, 2014, VRP Application Comments letter, which were included in Section 2 of the above referenced progress reports, noted that much of the information and documentation necessary to address these comments will be provided in future report submittals. As a result, EPD cannot make the determination that all comments from the May 2014 EPD VRP Comments Letter have been adequately addressed until after the receipt of the next scheduled VRP Progress Report, which should include the following: additional groundwater and soil delineation data, additional surface water/sediment sampling and ecological impact evaluation, and a conceptual site model update.
- 2) According to Section 2 of the original VRP Application, further assessment(s) would be completed regarding various potential sources of contamination onsite and offsite, including: a previous gasoline/diesel release by GPA onsite, the presence of heavy metals detected in the holding pond sample, arsenic detected in monitoring well MW-13S, calculation of site specific vapor intrusion concentrations and assessment of onsite vapor intrusion pathways, and the removal/abandonment of the onsite stormwater pipes/drainage culverts with an associated assessment of the soils around these drainage features. Please ensure that the next progress report includes the results, or current progress, of these additional assessments.
- 3) According to Figure 1-1, "possible areas of pipe failures" are noted along the stormwater drainage pipe to the north of RW-2 and RW-4. Please note, that according to historic file information, in 2009-2010 impacted soils/sediments were identified and remediated from the outfalls areas of the stormwater drainage pipes downstream of these pipe failures. Therefore, as part of future VRP investigation and remedial action efforts, EPD requests that soil samples be collected beneath these stormwater infrastructure failures to demonstrate that a release has not occurred.

- 4) Responses to EPD's May 20, 2014, VRP Application Comments letter, which were included in Section 2 of the above referenced progress reports, noted that the area associated with the "Former Office and Shop" does not warrant any additional investigations and will not be identified as an area of concern at the site. EPD does not concur, as the stated activities associated with this business may have potentially used and/or released chemicals similar to those that have been identified as the contaminants of concern (COCs) associated with this VRP investigation and corrective action. At a minimum, the VRP CSR must provide data to demonstrate that this past operation has not impacted the site with any of the identified COCs as it could potentially influence the final compliance certification and/or groundwater fate and transport model conclusions.

Risk Reduction Standards (Section 2, Response to EPD Comment Letter, Comments (7)-(11))

- 5) [Table 1-10: Toxicity Factors] The oral slope factor (Sfo) for benzene is incorrect whereas the Sfo for ethylbenzene is missing from the table. The correct Sfo that should be used is 5.5E-02 mg/kg and 1.1E-02 mg/kg, respectively; however, this does not impact any of the final RRS.
- 6) [Table 1-11: Final Type 4 RRS for Groundwater] The final Type 4 groundwater RRS for vinyl chloride and benzene are incorrect due to an editorial error. According to Table 1-12, the correct final Type 4 groundwater RRS for vinyl chloride and benzene should be 3.27 µg/L and 8.72 µg/L, respectively. Please revise the RRS accordingly, including the applicable revisions to the soil screening level calculations.
- 7) [Table 1-12: Type 4 RRS for Groundwater] To reduce confusion of what column #6 represents, please rename it so it states Type 3 Groundwater RRS.

The above listed comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Please provide responses to the above listed comments as part of the next scheduled Progress Report submittal. Should you have any additional questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 657-8660.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Thomas F. Panebianco, McKenzie Tank Lines
Christopher Novack, Georgia Ports Authority
Raj Mahadevaiah, Environmental International Corporation (email only)
File: VRP Application 1391540150 – McKenzie Tank Lines Site #10406