

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

2 Martin Luther King, Jr. Dr., S.E., Suite 1066 East, Atlanta, Georgia 30334  
Judson H. Turner, Director  
Land Protection Branch  
Keith M. Bentley, Branch Chief  
Phone: 404/656-7802 FAX: 404/651-9425

**Reply To:**  
Response and Remediation Program  
2 Martin Luther King, Jr. Drive, S.E.  
Suite 1462, East Tower  
Atlanta, Georgia 30334-9000  
Office 404/657-8600 Fax 404-657-0807

January 11, 2013

**VIA EMAIL & REGULAR MAIL**

Atlanta Gas Light Company  
c/o Mr. Greg Corbett, Director of Environment & Sustainability  
Ten Peachtree Place  
Atlanta, Georgia 30309

Re: July 2012 Progress Report Comments  
Former Rome Coal Tar Pit Site, HSI Site No. 10109  
Rome, Floyd County, Georgia

Dear Mr. Corbett:

The Georgia Environmental Protection Division (EPD) has received the July 19, 2012, "Response to Comments" letter, prepared by AECOM on behalf of Atlanta Gas Light Company (AGLC). This document was evaluated with respect to EPD's former January 18, 2012, letter and pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. After completing the review, EPD has prepared the following responses:

- **[Response to Comment (1)]:** EPD continues to believe that in order to ensure that the site related corrective actions continue to protect waters of the State that long term river surveying activities be incorporated into the environmental covenants for the site. EPD has noted the lines of evidence that AECOM has presented to reduce the surveying requirements, and is willing consider a variable schedule based on the results at the conclusion of the 10-year river survey monitoring.
- **[Response to Comment (2)]:** It was noted that the only parcels that AGL believes environmental covenants would be required is the West 1<sup>st</sup> Street parcel and its right-of-way. EPD contends that all site related parcels containing residual source materials ("blebs, stringers, etc.") and/or overlying the current groundwater plume, including any applicable parcels immediately downgradient, should be included in the properties needing an environmental covenant for: restricting the use of groundwater, continued certification of non-residential land use, and for requiring any necessary engineering controls on future construction of onsite structures in relation to the vapor intrusion exposure pathway.
- **[Response to Comment (5)]:** According to the discussions held during the May 18, 2012, meeting between EPD and the site representatives, AGLC indicated that they would provide case study data from other manufactured gas plant sites as supporting documentation to justify that the vapor intrusion pathway for the nearby commercial businesses (Parcels J14D 044-J14D50) would not be impacted. Please provide this information in the final CSR submittal.

- **[Response to Comment 6]:** Please indicate (using footnotes) which Type 1/3 groundwater RRS values are based on background or detection limit for Table 2-3. In addition, Georgia EPD does not accept California EPA's screening values from "*Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater*" (CALEPA 2005) to screen soil levels protective of indoor air. Soil constituents of interest (COI) therefore cannot be screened out as shown in Table 2-7. Please carry forward all detected substances in soil in the risk assessment process and evaluate using the J&E model. (Section 2.5.2.1)
- **[Response to Comment 8]:** EPD has one additional comment pertaining to Table 2-8. Please note that if a screening value is not available for a substance, the substance must still be evaluated for risk from vapor intrusion using the J&E model. Cyanide and Methane do not have a groundwater screening level as indicated in Table 2-8 and these substances would normally require an evaluation using the J&E model. However, considering that the site data does not indicate high concentrations of these substances in the groundwater and soil, EPD will defer this particular requirement at this time.
- **[Response to Comment 9]:** EPD continues to hold the position that the adjusted exposure time (ET) and resulting exposure frequency (EF) is not acceptable for this site. EPD believes that a typical worker would work beyond 8 hours/day and continues to recommend that the EF remain unchanged (i.e. 250 days/yr). Please revise all tables, equations, and calculations accordingly.
- **[Response to Comment 10]:** EPD has one additional comment pertaining to Table 2-12. The final Type 4 RRS for Benzene is based on the Cal EPA screening level. Cal EPA is not an acceptable source for screening levels (as stated in the "Response to Comment 6), and screening levels cannot be substituted for cleanup values. Please revise Table 2-12 based on the lower of the cancer/non-cancer risk.
- **[Response to Comments 13 & 14]:** It is noted that the initial groundwater concentration (Cw) is entered as 1.00E+00 for all substances. This is incorrect. Georgia EPD requires that the Maximum Detected Concentration (MDC) for a regulated substance be used as the Cw term in the J&E model. For example, for Benzene the Cw term should be 3000 µg/L (based on Table 2-8). Please revise the Cw term for all COI, and rerun the J&E model.

EPD accepts your request for a meeting to discuss the comments and associated responses included within the July 2012 Letter, and recommends that you contact the site compliance officer, Kevin Collins, to discuss scheduling options for a meeting. The above listed comments may be addressed within the scheduled VRP CSR submittal, due by a date to be determined in the referenced future meeting.

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Should you have any additional question or concerns regarding this site, 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: Ira Pearl, AGLC  
Jim Morrison, ERM  
Ira Levy, Battery Downtown LLC  
John Bennett, City Manager, City of Rome  
Daphne Jones, PSC

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