



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

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October 2, 2018

Via U.S. Mail

And Email: RWMitche@southernco.com

Georgia Power Company
c/o Robert W. Mitchell
Environmental Affairs Manager
241 Ralph McGill Boulevard
Atlanta, Georgia 30308

Subject: EPD Comments
Voluntary Remediation Program Compliance Status Report
Savannah Electric - Plant Kraft, HSI Site No. 10415
155 Crossgate Road, Port Wentworth, Chatham County, Georgia

Dear Mr. Mitchell:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program (VRP) Application and Compliance Status Report (CSR) dated June 15, 2018 as an application for enrollment in the VRP for the referenced site submitted by the Georgia Power Company (Georgia Power). EPD has the following comments:

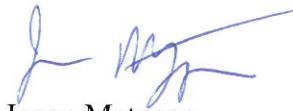
1. An additional groundwater monitoring event should be conducted to further evaluate radium concentrations and geochemical conditions in groundwater in the vicinity of the former ash pond area.
2. As was reported in the VRP Application, wastes inconsistent with inert materials were observed in the landfill during the excavation activities. While EPD acknowledges that these impacts appeared isolated to Georgia Power contractors during the field activities, confirmation groundwater characterization is requested downgradient of the inert landfill for VOCs, SVOCs and PCBs. In the event that existing monitoring wells MW-15D(R), MW-15C(R), and MW-15A (R) are downgradient of the observed waste materials, please provide VOC and PCB analysis for these wells as SVOC analysis has been historically performed.
3. Additional groundwater characterization is needed in the eastern portion on the site, downgradient of certain areas of potential environmental concern, to ensure that groundwater has been appropriately assessed in this area. The 2016 and 2017 investigations included several potential release areas. However, some areas could not be characterized because demolition activities were not completed. Where possible, new monitoring wells should be positioned downgradient of uncharacterized areas. Samples collected from the additional monitoring wells should be analyzed for metals, VOCs, SVOCs, and PCBs.

4. Additional groundwater characterization is requested southeast of the Potential Buried Drum – Storage Building Expansion Area (Location 23 on Figure 4). Samples should be collected and analyzed for metals, VOCs, SVOCs, and PCBs.
5. Results obtained to address Comments 2 through 4 should be combined with historical data collected during the Phase II and excavation activities to identify site-wide or area-specific constituents of concern (COC). For each COC, it must be demonstrated that the delineation criteria for soil and groundwater under the VRP Act has been met.
6. Cleanup activities for PCBs in the low-voltage switch yard are being addressed under TSCA with EPA oversight. Please provide documentation of EPA's acceptance of the PCB cleanup activities.
7. A Monitoring and Maintenance Plan is needed to provide for monitoring and maintenance of soil subject to engineering controls under Type 5 RRS. This may be submitted in conjunction with the covenant for the parcel.
8. EPD acknowledges the conclusions provided in the vapor intrusion evaluation. However, when comparing indoor air and groundwater concentrations, the vapor concentration should be converted to an equilibrium groundwater concentration using the dimensionless Henry's Law Constant (H'). Based on available literature values for H' , EPD finds the conclusions to be acceptable.

The above recommendations should be addressed in order to demonstrate compliance with the provisions, purposes, standards, and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Georgia Power. However, failure of EPD to respond to a submittal within any timeframe does not relieve Georgia Power from complying with the provisions, purposes, standards, and policies of the Act.

If you have any questions, please contact Michael Smilley of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

c: Stephen K. Wilson (via email: Stephen.Wilson@ResoluteEnv.com)
Andrea Rimer (via email: andrea.rimer@troutmansanders.com)

File: 242-0209 (VRP)

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