

October 1, 2019

Via Overnight Delivery

Mr. Jason Metzger  
Program Manager  
Response and Remediation Program  
Georgia Environmental Protection Division  
2 Martin Luther King Jr. Drive SE  
Atlanta, GA 30303

Subject: Second VRP Progress Report  
Voluntary Remediation Program  
Savannah Electric - Plant Kraft, HSI Site No. 10415  
155 Crossgate Road, Port Wentworth, Chatham County, Georgia

Dear Mr. Metzger:

Resolute Environmental & Water Resources Consulting, LLC (Resolute), on behalf of its client, Georgia Power Company, is submitting this Second Voluntary Remediation Program (VRP) Progress Report for the former Savannah Electric - Plant Kraft (HSI Site 10415) in Port Wentworth, Georgia.

**Background**

On June 15, 2018, Georgia Power Company submitted a VRP Application, including a VRP Compliance Status Report (CSR) and checklist for the above-referenced site. The Georgia Environmental Protection Division (EPD) approved the Application on October 2, 2018 and requested submittal of the First VRP Progress Report by April 2, 2019. EPD also issued a Comments Letter, dated October 2, 2018, on the VRP CSR.

On March 21, 2019, the VRP Revised CSR, dated, February 22, 2019 and Georgia Power Company's Response to Comments letter, dated March 1, 2019, were submitted under combined cover to EPD. The documents presented details of Georgia Power Company's additional soil and groundwater assessment at the site and provided additional documentation in response to EPD's comments, respectively. On March 29, 2019, the First VRP Progress Report was submitted by Resolute.

**Update**

Since submittal of the First VRP Progress Report, Georgia Power Company has performed additional soil assessment at the site, beneath and adjacent to the western substation (Substation II). The results of this assessment will be presented in an Addendum to the VRP CSR, which we anticipate will be submitted to EPD by mid-October 2019.

Based on the additional soil assessment conducted at Substation II, concentrations are in compliance with a Type 1 Risk Reduction Standard (RRS), and a Type 5 RRS for soil will not

be necessary for the site. Based on this conclusion, a restricted use zone for soil beneath Substation II and the associated Monitoring and Maintenance Plan for soil will not be needed in the Environmental Covenant for this area. A revised version of the Environmental Covenant will also be submitted with the Addendum to the VRP CSR.

Attached is a table documenting Mr. Wilson's time for direct oversight of the Revised CSR development and implementation, as the Professional Geologist on the VRP Application. Also attached is Mr. Wilson's PG Certification.

If you have any questions about this Second VRP Status Report, please contact the undersigned at (678) 398-9942.

Sincerely,

**Resolute Environmental & Water Resources Consulting, LLC**

A handwritten signature in blue ink, appearing to read "Stephen K. Wilson". The signature is stylized with a large initial "S" and a long, sweeping underline.

Stephen K. Wilson, P.G.  
Principal

Attachments: Table of Hours  
PG Certification

cc: Mike Smilley, Georgia EPD  
Christina Coleman Robinson, Georgia Power Company  
Andrea Rimer, Troutman Sanders

**Table**

Summary of PG Hours Invoiced and Description of Activities  
Former Savannah Electric - Plant Kraft VRP Site  
Port Wentworth, Chatham County, Georgia

Month	Hours Invoiced - Stephen K. Wilson, P.G.	Description of Activities
March 2019	8.75	CSR Report Review and Correspondence
April 2019	3.25	Client Correspondence
May 2019	1.5	Client/Agency Correspondence
June 2019	11.5	Client/Agency Correspondence and Report Review
July 2019	18.25	Client/Agency Interaction and Response to Comments
August 2019	15	Client Interaction and Response to Comments

### PG 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/professional geologist who is registered with the Georgia State Board of Registration for Professional Engineers and Land Surveyors/Georgia State Board of Registration for Professional Geologists 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 attached a monthly summary of hours invoiced and 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."



Stephen K. Wilson, P.G.  
State of Georgia PG Registration No. 891  
Principal – Resolute Environmental & Water Resources Consulting, LLC