

October 1, 2020

***Via Electronic Mail***

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

Subject: Fourth 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 Fourth 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. Georgia Power Company subsequently submitted an Addendum to the VRP CSR, dated October 30, 2019, which withdrew the request for a Type 5 RRS and Uniform Environmental Covenant for soil in the vicinity of Substation II, the western substation (Substation II), based on the results of additional assessment. The VRP CSR Addendum also presented a revised version of the Environmental Covenant (EC). The First, Second, and Third VRP Progress Reports were submitted by Resolute on March 29, 2019, October 1, 2019, and April 2, 2020, respectively.

**Update**

Since submittal of the Third VRP Progress Report, EPD issued comments on the draft ECs via an email dated July 24, 2020. EPD also issued a letter to Georgia Power Company, dated

June 25, 2020. This letter approved the VRP CSR documents, stating that EPD found the Revised CSR, dated, February 22, 2019 and the Addendum to the Revised VRP CSR, dated October 30, 2019, to be complete with respect to the VRP Act and Rules for Hazardous Site Response. EPD also concurred with the Certification of Compliance, dated October 29, 2019, for soil, as well as concurring that groundwater will comply with the VRP Act through the use of ECs. Once the ECs have been recorded for the applicable properties, the site can be removed from the HSI.

Georgia Power Company and the donee are in the process of finalizing the ECs as of the date of this report.

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 Third VRP Status Report, please contact the undersigned at (678) 398-9942.

Sincerely,

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

A handwritten signature in blue ink that reads "Stephen K. Wilson". The signature is written in a cursive style with a large initial 'S'.

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
May 2020	2.5	Client correspondence
July 2020	0.75	Client correspondence
August 2020	7.5	Correspondence with client and potential donee

## 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