



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

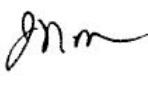
ENVIRONMENTAL PROTECTION DIVISION


Richard E. Dunn, Director

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September 21, 2021

MEMORANDUM

TO: Jason Metzger, Program Manager
Response and Remediation Program 

THROUGH: Susan Kibler, Unit Coordinator
Response and Remediation Program 

FROM: Michael Smiley, Geologist
Response and Remediation Program

SUBJECT: Reclassification and Removal of Site from the Hazardous Site Inventory
Savannah Electric – Plant Kraft, HSI Site No. 10415
155 Crossgate Road, Port Wentworth, Chatham County, Georgia

BACKGROUND

Savannah Electric notified EPD of a cresol release to soil on January 17, 1995 near a former canal and waste disposal area on the northernmost portion of the Subject Property (the North Area). Supplemental information was provided to EPD in a report dated February 23, 1995 confirming a release of SVOCs to groundwater. Savannah Electric attributed the impacts to the presence of a former canal originating from the Atlantic Wood Industries Facility to the south, however this could not be confirmed. The Site was listed on the HSI for soil and groundwater on May 10, 1996. Corrective action at the adjacent Atlantic Wood Industries Facility, HSI 10018, was initiated under RCRA and is currently ongoing.

The Main Plant Area, located south of the North Area, includes a former ash pond and several structures supporting coal and petroleum power generation at the Subject Property. The Subject Property was an active power plant until it was retired in October 2015. Coincident with retiring the power generation structures, the coal ash pond was removed through excavation between June 5, 2015 and August 22, 2016 and decommissioning of the power generation structures was initiated. Groundwater monitoring occurred at the Subject Property between 2016 and 2017, consistent with the United States Environmental Protection Agency Federal Coal Combustion Residuals (CCR) Rule (40 CFR 257, Subpart D). Concurrent with the groundwater sampling period, Resolute, on behalf of Georgia Power, performed a Phase II environmental site assessment (Phase II) at the property to identify potential sources of soil and groundwater impacts not historically associated with the North Area. Several metals were detected above notification concentrations. A Hazardous Site Response Act (HSRA) notification was submitted for the Subject

Property in a letter dated March 31, 2017. EPD responded June 20, 2017, indicating that no separate scoring of the release would occur since it was previously determined that the release of a reportable quantity had already occurred on the Property.

On November 22, 2016, the Georgia Rules for Solid Waste Management were amended to incorporate the Federal CCR Rule. In a letter dated February 20, 2017, Georgia Power indicated that Georgia Power's ash ponds and landfills are regulated under the Georgia Rules for Solid Waste Management, not HSRA, with the exception of Plant Kraft. Because Plant Kraft ceased generation activities prior to October 19, 2015 [CCR Rule at 40 C.F.R. 257.50(e)], and the ash pond was closed by removal of all ash and off-Site disposal prior to the November 22, 2016 effective date, it is not regulated by the Federal CCR Rule or the Georgia CCR Rule. This was acknowledged by the Director in a letter dated March 31, 2017.

Georgia Power submitted a VRP Application and CSR on June 15, 2018, which included impacts identified on both the North Area and Main Plant Area. EPD approved the application with comments in a letter dated October 2, 2018. Additional delineation and sampling to address the comments was performed in late 2018 and early 2019. Georgia Power submitted the Revised VRP CSR on February 22, 2019. Based on a meeting with EPD, several additional borings were advanced along the northern boundary of the former ash pond, along the berm west of the former ash pond, and around the substation located west of the former ash pond. These results were presented in the Addendum to the Revised VRP CSR dated October 30, 2019. The CSR was conditionally approved by EPD, pending execution of Uniform Environmental Covenants (UECs), in a letter dated June 25, 2020.

North Area Compliance

Historically, groundwater samples collected from several North Area monitoring wells have exceeded Type 1 through 4 risk reduction standards (RRS). Routine groundwater monitoring has been performed in the North Area since 1998. RRS exceedances of SVOCs occurred at the MW-15-series wells (MW-15A(R), MW-15C(R), MW-15D(R)) when compared to Type 4 RRS calculated in 1998. Recalculated Type 4 RRS were re-submitted in a semi-annual groundwater report, dated March 28, 2018. EPD approved revised Type 4 RRS for benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and indeno(1,2,3-cd)pyrene in a letter dated May 10, 2018. Based on the revised RRS, SVOC concentrations have been in compliance since January 13, 2013. In addition, samples collected in October 2018 did not detect VOCs or PCBs. As a result, no additional sampling or investigation is planned in the North Area. The North Area is part of an approximately 42-acre tract (Parcel 1-0727-01-001) that Georgia Power plans to donate to the Georgia Ports Authority.

Main Plant Compliance and Corrective Action

The Phase II investigation identified several areas where compounds in soil exceeded their respective Type 3 RRS. These areas included the former inert landfill, fuel oil AST pads and berms, soils beneath the former coal pile, and several transmission line right-of ways. In these areas, soils exceeding Type 3 RRS were excavated, and confirmation samples were collected on a grid pattern below the excavation. The excavations were continued until confirmation samples were collected below the Type 3 RRS or the water table was encountered. In addition to those areas identified as part of the Phase II, Georgia Power identified several other areas for removal

based on the potential presence of ash and/or previous investigations. These areas included the northern canal, eastern former ash pond, road and railbed area south of Plant Kraft Substation I, the low voltage switchyard (approved by US EPA under TSCA), the Substation I road, and the Excavation Parking Lot. During several of the originally planned excavations, coal ash and/or mill rejects were visually observed. In these cases, the excavation was continued until the visually observed material, where present in deposits greater than 6-inches thick, was removed. Confirmation sampling was performed following visual removal. Consistent with the areas identified in the Phase II investigation, excavations were continued until confirmation samples were collected below the Type 3 RRS or the water table was encountered.

Arsenic and combined radium (226 and 228) in groundwater near the former ash pond currently exceeds the MCL. Risks posed by groundwater are being addressed by covenants restricting groundwater use. Environmental covenants restricting groundwater use have been implemented on Tax Parcel 1-0727-01-001 (planned for donation to the Georgia Ports Authority), Tax Parcels 1-0727-01-003 and 1-0727-01-004 (property to be retained by Georgia Power), and the property to the north owned by the Georgia Ports Authority (Parcel ID 1-0808-01-003).

The UECs were signed by the Director on April 13, 2021 and recorded in the Chatham County deed records on May 7, 2021. For parcels 1-0727-01-001, 1-0727-01-003, and 1-0727-01-004, the UECs limit future use to non-residential and restrict groundwater use for drinking or any other non-remedial purposes. For the Georgia Ports Authority Property (Parcel ID 1-0808-01-003), the UEC restricts groundwater use only.

A portion of parcel 1-0727-01-003 soil and groundwater is affected by impacts from the adjacent Atlantic Wood Industries (AWI; currently known as Georgia Atlantic Port, LLC) site, which is being addressed under Hazardous Site Inventory (HSI) No. 10018. Potential creosote impacts remain on a canal that runs along the southern boundary of parcel 1-0727-01-003.

RECOMMENDATION

With the exception of impacts identified on 1-0727-01-003, I concur that soil meets Type 3 RRS and that groundwater at the Savannah Electric – Plant Kraft Site is in compliance Type 5 RRS and with the provisions, purposes, and standards of the Act through the use of UECs. Therefore, the Savannah Electric – Plant Kraft, HSI Site No. 10415 has met the requirements of the VRP Act and the Rules, and I recommend that the Site should be reclassified and removed from the HSI according to Subparagraph 391-3-19-.05(4)(b) of the Rules and Section 12-8-107(f) of the VRP Act.