Atlanta Gas Light

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February 9, 2024

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, Georgia 30334

RE: Docket 4167-U Quarterly Report Period October 1, 2023 to December 31, 2023
Environmental Response Cost Recovery Rider Expenses

Dear Mr. McAlister:

Pursuant to the terms of the Commission's Order and Settlement Agreement in Docket 4167-U regarding the Environmental Response Cost Recovery Rider (ERCRR) expenses, Atlanta Gas Light Company (AGLC) respectfully submits the following information for the quarter year period of October 1 to December 31, 2023. We have attached a narrative summary of significant remediation and cleanup activities that have occurred across our manufactured gas plant (MGP) sites. Also included is an overview page of environmental regulatory approval progress at the MGP sites. The environmental and related expenses incurred for this quarter total $231,482. The cumulative amount for recoveries from third parties, insurance carriers and potentially responsible parties since inception is approximately $27,339,000. Further, between October 1, 2023 to December 31, 2023, AGLC recovered a total of $1,526,112 revenue from the Environmental Response Recovery Rider.

If you have any questions regarding this information, please do not hesitate to contact me at 404-584-4263.

Sincerely,

Michael Morley
Director, Regulatory Reporting and Strategy

Enclosures

cc: All Commissioners
Nancy Tyer, Natural Gas Section
Janey Chauvet, Natural Gas Section
Tony Wackerly, Natural Gas Section
Joanne Mello, AGL
Bryan Batson, AGL
Greg Corbett, AGL

Manufactured Gas Plant Sites
Quarterly Update
Period from October 1 through December 30, 2023

Atlanta Gas Light Company (AGLC) continues with the investigation and remediation of its former manufactured gas plant (MGP) sites. During this quarter (**October 1 through December 31, 2023**), AGLC incurred expenses of $231,482. The cumulative amount for recoveries from third parties, insurance carriers, and potentially responsible parties since inception is in excess of $27,339,000. For this quarter, there were no third-party insurance recoveries.

A brief narrative of the significant activities during the past quarter is presented below and is followed by an overview of planned activities for the next quarter. Some updates include material from previous activity reports to provide additional background information that affect activities presented in this report.

Athens

October 1 through December 31, 2023:

- Site construction in connection with redevelopment by the property owner Athens-Clarke County (ACC) is ongoing but primarily complete.
- Athens is a shared site with Georgia Power Company (GPC), who leads the effort.
- Q4 Total Site Costs = $985

Planned Activities for January 1 through March 31, 2024:

- GPC and AGLC will continue to work with ACC and their contractors on soil handling and disposal until the construction excavation is complete.
- No activities are planned for this quarter.

Augusta

October 1 through December 31, 2023:

- AGLC continued to work with JLL and local officials to identify the optimal beneficial reuse of the parcels AGL owns taking into account all relevant considerations.
- Q4 Total Site Costs = $20,709

Planned Activities for January 1 through March 31, 2024:

- The Voluntary Remediation Program (VRP) Compliance Status Report (CSR) documenting that soil and groundwater meets the provisions of the VRP Act was submitted in June 2021, which included a request for closure and delisting. As requested by EPD, AGLC will submit the revised parcel summary table (Table 1) and associated figures by email for their approval. Once the table and figure edits are approved by EPD, AGLC will prepare a VRP CSR Addendum to document parcel designation changes, as well as respond to any additional EPD comments on the VRP CSR, if received, and will continue to work toward site closure.
- AGLC will continue to work with JLL and local officials to identify parties interested in developing the parcels.
- AGLC will submit the draft Type 5 marker language and draft uniform environmental covenants (UECs) for all the affected parcels to EPD.

Brunswick

October 1 through December 31, 2023:

- The Annual Site Visual Reconnaissance Inspection report was submitted in July 2023.
- Q4 Total Site Costs = $0

Planned Activities for January 1 through March 31, 2024:

- No activities are planned for this quarter.
- Site is shared with GPC and, per agreement, AGLC leads the ongoing monitoring.

Griffin

October 1 through December 31, 2023:

- In an email dated November 28th, EPD provided comments on the draft UEC, which requested the additional language to include the need for long-term monitoring (annual visual site inspections) and vapor intrusion assessments upon development. AGLC responded in email on December 6th, stating that the nature of the proactive language in the proposed UECs should preclude the need for long-term monitoring. In response, EPD requested the language that AGLC considered to be proactive, which was sent on December 7th.
- On December 20th, EPD provided a response to AGLC's question on the need for long-term monitoring for the Griffin site, agreeing that monitoring might not be necessary for Griffin but reserved the right to require it for other sites and requesting only minimal additional language regarding vapor risk evaluation prior to change in use. AGLC responded on December 21st requesting a call or meeting in person to discuss EPD's position on the UEC language, mainly as it might relate to other sites.
- Q4 Total Site Costs = $1,558

Planned Activities for January 1 through March 31, 2024:

- The chlorinated treatment system to address non-MGP-related impacts remains decommissioned. These impacts are likely associated with a dry cleaner (or cleaners) that formerly operated upgradient. One of the upgradient sites has been designated a HSRA site.
- AGLC will continue to work with EPD on resolving these or additional EPD comments received on the VRP CSR and/or proposed UEC language, if any are received. AGLC will request a meeting with EPD in early 2024.

Macon

October 1 through December 31, 2023:

- With the submittal of the VRP CSR, groundwater monitoring and Semiannual VRP Progress Reports have been discontinued.
- AGLC continued preparing for the remaining well abandonments by drafting the well abandonment plan to include abandonment of all remaining site wells.
- The Norfolk Southern Environmental Right-of-Entry agreement was finalized and executed.
- In order to keep the closure process moving forward, AGLC will re-submit all remaining UECs, in red line, for EPD to review.
- Q4 Total Site Costs = $8,411

Planned Activities for January 1 through March 31, 2024:

- AGLC will respond to EPD's comments on the remaining UECs, if any, and will continue to work toward site closure.
- AGLC will finalize and submit the monitoring well abandonment plan for all remaining site wells. Upon approval of the well abandonment plan, AGLC will attempt to locate and abandon all remaining site wells.

Macon 2

October 1 through December 31, 2023:

- No field activities or further reports are expected at this site.
- As background for non-field activities in the reporting period, in 2005 AGLC and GPC entered into an Agreement Regarding Past Costs and Restrictive Covenants (the "2005 Agreement") with the Macon-Bibb County (MBC) and Macon Urban Development Authority (MUDA), current owners of the Macon 2 property. Among other things, the 2005 Agreement called for the utilities to clean up the property to nonresidential standards and to pay MBC compensation for limiting the property to nonresidential use. The 2005 Agreement also gave MBC rights to change the restrictions to include residential uses but only after returning to AGLC and GPC the compensation paid for the

restrictions. In late September 2019, AGLC and GPC received a package of information from an attorney for MBC and MUDA indicating that they have been actively exploring residential site development on the property. Through these communications, AGLC and GPC learned that in May 2015 MBC and MUDA submitted an application to enter the site into the VRP. The remedial plan included conducting additional investigation to determine the extent of any further corrective action that might be needed to certify site soils to residential standards. EPD accepted the site into the VRP in 2015 and investigation and excavation activities were conducted from 2014 to 2018. A VRP CSR was submitted in November 2018, with an amendment in April 2019. In May 2019, MUDA executed a new Uniform Environmental Covenant ("UEC") that conflicted with the restrictions required by the 2005 Agreement by allowing for some residential use and listing only MBC and MUDA as "Interested Parties" while excluding AGLC and GPC. The UEC also failed to bring the existing restrictions to the attention of EPD. After notifying MBC and MUDA of these concerns, AGLC and GPC made an extensive review of the 2005 Agreement and all relevant correspondence from 2014 to date in order to develop a possible approach that would honor the 2005 Agreement while allowing MBC and MUDA to achieve their redevelopment goals. In January 2022, AGLC and GPC provided a draft term sheet to MUDA for an agreement that would replace the 2005 Agreement. On February 10, 2022, MUDA's board approved the parameters of the proposed term sheet. Therefore, all parties appear to be ready to proceed towards negotiating a definitive agreement; however, MBC and MUDA have delayed further efforts pending commitments from private development partners.

- Q4 Total Site Costs = $0

Planned Activities for January 1 through March 31, 2024:

- No activities are planned for this quarter.
- AGLC and GPC will continue to work with MBC and MUDA to coordinate revisions to the UEC and existing covenant (if required), or toward obtaining a binding agreement to replace the 2005 Agreement Regarding Past Costs and Restrictive Covenants with the City of Macon until an agreement with all parties is reached.

Rome

October 1 through December 31, 2023:

- No activities were conducted this quarter.
- Q4 Total Site Costs = $2,217

Planned Activities for January 1 through March 31, 2024:

- No activities are planned for this quarter.

Savannah

October 1 through December 31, 2023:

- Quarterly system effluent sampling and flow meter readings continued this period.
- The results of the quarterly effluent sample collected in September 2023 and flow meter readings were submitted in a Quarterly Discharge Monitoring Report (DMR) on October 15, 2023.
- Quarterly effluent sampling covering the period October through December of 2023 was conducted in early December 2023. Semiannual flow meter calibration was also conducted in December 2023.
- Q4 Total Site Costs = $7,867

Planned Activities for January 1 through March 31, 2024:

- Collection of groundwater will continue through use of the interceptor wall and collection system.
- Quarterly system effluent sampling and flow meter readings will continue in this period.
- The results of the quarterly effluent sample collected in December 2023 and flow meter readings will be submitted in a Quarterly DMR by January 15, 2024. The semiannual flow meter calibration will also be included in the Quarterly DMR.
- Quarterly effluent sampling will be conducted in March 2024.

- Semiannual flow meter calibration and system repairs (as needed) will be conducted in 2024; the calibrations are to be performed no later than the end of the months of June and December. The proof of calibration for the first and second halves of calendar year 2024 will be submitted no later than July 15, 2024 and January 15, 2025, respectively.
- After an evaluation of site current and historical groundwater elevation data, AGLC concluded that the system does not need to be restored to full operation status (i.e., pumping wells and system repaired and operational) to be effective. In addition, since the effluent data has been below detection limits for over 10 years, AGLC plans to request no further action, as the City of Savannah has indicated in recent conversations that they would be amenable to this approach. EPD stated that it will not comment on our informal proposal for the path forward for closure unless a formal modification request is submitted. AGLC is contemplating closure options, which likely will require entering the site into the VRP.
- AGLC will continue to coordinate with GPC if workers need to enter the areas with a groundwater restriction during development of three hotels on the former Southern Electric Power Company property.

Valdosta

October 1 through December 31, 2023:

- No activities were conducted this quarter.
- Q4 Total Site Costs = $0

Planned Activities for January 1 through March 31, 2024:

- No activities are planned for this quarter.

Waycross

October 1 through December 31, 2023:

- No activities were conducted this quarter.
- Q4 Total Site Costs = $0

Planned Activities for January 1 through March 31, 2024:

- MNA will continue as the selected groundwater remediation technology, with annual MNA groundwater monitoring in March and reporting in May of each year until site closure.
- No activities are planned for this quarter.

Orlando

October 1 through December 31, 2023:

- Continued operation of the remediation system and remediation system related sampling and operation and maintenance (O&M) in accordance with the Short-Term Groundwater Monitoring Plan and approved proposed modifications to the groundwater performance monitoring program included in Table 25 of the *October 2023 Semi-Annual Report (Year 3 Month 7-12 Reporting Period)* submitted to the United States Environmental Protection Agency (USEPA) and Florida Department of Environmental Protection (FDEP) on October 24, 2023.
- Quarterly sampling was performed.
- The air sparge system (primary site groundwater remediation technology for impacts outside the barrier wall) continued operations on a cycled basis. The SVE system continued operations.
- On October 24, 2023, the Group submitted the *OU1 Semi-Annual Report for Year 3 Months 7 through 12* to the USEPA and FDEP.
- The Group and Geosyntec conducted a comprehensive round of groundwater sampling and synoptic water level measurements of the existing network of UFA monitoring wells in November 2023. The annual report documenting the results is being prepared.
- On October 13th, the Group submitted the *Push-Pull Flushing Study Report* to the USEPA and FDEP. This report provides the data and results for work conducted during 2022-2023 in accordance with Section 3 of the *OU2 Phase 2 Pilot Study Work Plan* (dated 19 October 2021).

- The Group and Geosyntec submitted a technical memo (2023 Groundwater Flow Model Enhancements and Calibration) describing a steady-state groundwater flow model for the site to USEPA and FDEP on December 15, 2023.
- Q4 Total Site Costs = $51,263

Planned Activities for January 1 through March 31, 2024:

- Groundwater treatment systems in OU1 will be operated and monitored and operating parameters will be adjusted as needed.
- Geosyntec will continue to refine the existing groundwater flow model based upon the data collected in 2020, 2021, 2022, and 2023.
- The Group and Geosyntec will submit the annual report documenting the results of the November 2023 OU2 Site-wide groundwater monitoring activities.
- The Group will meet with FDEP and EPA on February 12 to discuss the OU2 conceptual site model, Feasibility Study elements, including the Remedial Action Objectives and Preliminary Remediation Goals , and alternatives for evaluation.
- The Group will continue to coordinate with the State of Florida (Bureau of Public Lands, FDEP) to secure an easement for continued access to UF-MW-30 and UF-MW-31 following the conclusion of the 1-year license agreement.

St. Augustine

October 1 through December 31, 2023

- The new owner of the marina site indicated that development of the site will be reinitiated, which was anticipated to begin in September, but now has been pushed back to mid to late February to early March 2024.
- AGLC finalized the Soil Environmental Management Plan in preparation for mobilization.
- AGLC continued to work with the owner and City to prepare for assistance with the soil management oversight during site development, as needed.
- Q4 Total Site Costs = $27,925

St. Augustine (continued)

Planned Activities for January 1 through March 31, 2024:

- AGLC will continue to work with the owner, developer, and the City to prepare for site construction and soil management. This may include soil management oversight by AGLC and/or AGLC representatives.
- The Group will work with USEPA and FDEP towards a no further action for groundwater for closure of the site. AGLC and the City will be responsible for continuing obligations associated with maintenance of the institutional controls.

Sanford

October 1 through December 31, 2023:

- The annual groundwater monitoring report was submitted in December 2023.
- Q4 Total Site Costs = $2,669

Planned Activities for January 1 through March 31, 2024:

- EPA will be conducting a five-year review for the Site in 2024. The Group will provide support to the USEPA contractor preparing the five-year review report.

Environmental Regulatory Approval Progress at MGP Sites

Georgia Program

On January 5, 2001, the Georgia Environmental Protection Division (EPD) approved the corrective action plans (CAPs) for the Athens, Macon, and Savannah manufactured gas plant (MGP) sites. Coupled with CAP approvals in 2000 for Brunswick, Waycross, Griffin, Rome, and Valdosta, Atlanta Gas Light Company (AGLC) met its commitment to the Georgia Public Service Commission's (PSC) timeline for the Georgia sites. On April 14, 2004, the EPD reclassified Athens, Brunswick, Rome, and Waycross as Class V sites under the Hazardous Sites Response Act (HSRA) or Hazardous Waste Management Act. This means that the EPD has designated each site on the Hazardous Site Inventory (HSI) as a site that has an approved CAP and is undergoing corrective action. These sites were previously listed as Class II on the HSI.

Since March 30, 2001, the following reports have been accepted and approved by the EPD: Remedial Investigation (RI) Reports for Augusta, Griffin, Savannah, and Valdosta; Compliance Status Reports (CSRs) for Athens, Brunswick, Macon, Macon 2, Rome, and the Waycross Canal; and CAPs, including CAP Addendums and Basis of Design Work Plans (BDWPs), for the Athens Riverbank and River Sediment, Augusta Off-Site Parcels, Rome Groundwater and River Sediment, Savannah Off-Site Parcels, Valdosta Off-Site Soil, Wetland, and Sediment, and Waycross Soil. Voluntary Investigation and Remediation Plans (VIRPs) in lieu of CAPs have been prepared for the Rome, Augusta, and Macon sites. The Rome site was moved to the Voluntary Remediation Program (VRP) in January 2012. A VRP CSR was submitted to the EPD on December 6, 2013, a CSR Addendum was submitted on August 15, 2014, and executed Uniform Environmental Covenants (UECs) were received by the EPD on May 29, 2015. On August 10, 2015, the EPD issued a Delisting Letter, removing the site from the HSI in accordance with HSRA rules. In a December 3, 2014 correspondence, the EPD approved the Augusta VIRP, accepting the site into the VRP. In January 2015, the EPD issued a new consent order for the Macon site, approving transition into the VRP. In May 2015, the EPD accepted the Macon site into the VRP and approved the Macon VIRP. Since the Brunswick MGP site has met the closure requirements of the approved June 2006 CAP, a letter requesting delisting and site closure was submitted to the EPD on May 25, 2016. The EPD approved delisting the Brunswick MGP Site in May 2017. In December 2010, AGLC submitted the final groundwater monitoring report for the Valdosta former MGP site, which included a request to discontinue groundwater monitoring and site closure as the groundwater standards had been met for three years. On August 26, 2021, EPD provided a letter stating that the final certifications for all parcels had been approved and since the UEC for tax parcel 0119D 068 had been court-filed, the requirements of Consent Orders EPD-HW-1009 and EPD-HW-1390 had been satisfied. Therefore, the Orders on the Valdosta site were terminated, and the site was delisted.

Several issues remain that may affect the scheduled groundwater completion dates for sites with completed CAPs. The EPD's review of documents may lead to further investigation or remediation requirements, including those under or triggered by Continuing Action Monitoring Plans (CAMPs). With regard to groundwater, several of the sites rely on monitored natural attenuation (MNA) as the most cost-effective and technically feasible groundwater remediation technique; however, active groundwater containment and/or treatment systems are required by the EPD for several of the sites. An active system is operating at the Savannah site. The groundwater treatment system at the Augusta site was shut down in 2015 in preparation for the start of the next phase of remediation in the Galliard zone groundwater, which was completed in October 2019. In addition, in 2011, AGLC performed additional investigation of on-site and upgradient groundwater detections at the Griffin site. Lastly, as previously noted, the EPD sought more aggressive groundwater remediation of source material at the Macon and Augusta sites, and subsequently, VIRPs were submitted as required.

In January 2021, Georgia Power Company (GPC) and AGLC submitted an application into the VRP for the Athens former MGP site, which included the VRP CSR. The application was approved by EPD on September 8, 2021, with minor comments. GPC and AGLC responded to several rounds of EPD comments and submitted the VRP CSR Addendum on March 24, 2023. On May 1, 2023, EPD provided a letter stating that they determined that the CSR is complete and meets the requirements of the Georgia VRP Act and they concur with the certification of compliance that the site parcels are in compliance with non-residential risk reduction standards (RRS) for soil and Type 5 RRS for groundwater. Therefore, the Order on the Athens site was terminated, and the site was delisted. In April 2021, AGLC submitted a VRP application for the Griffin former MGP site. On April 1, 2022, EPD provided a letter to AGLC stating that the Griffin MGP site was accepted into the VRP. In addition to regulatory approval progress at the AGLC MGP sites, the following information also provides site-specific details for each of the Georgia sites.

Athens

- January 5, 2001: The EPD approved the CAP for the Athens site.
- April 14, 2004: The EPD reclassified Athens as a Class V site under HSRA.
- May 2007: The EPD affirmed that no remedy change for Athens was required at that time.
- June 2009: The EPD requested additional data concerning the progress of groundwater remediation at the Athens site, and the long-term remedy continues to be MNA.
- January 2017: A letter report detailing November 2016 the groundwater sampling event was submitted to EPD in lieu of a semiannual groundwater sampling report with the approval of the EPD, because two wells could not be sampled due to a lack of water.
- June 2018: The EPD provided a letter indicating that they had reviewed the 28th and 29th Semiannual Groundwater Monitoring Reports (SAGWMR). The EPD requested two copies of updated CDs for the 28th SAGWMR that included the analytical laboratory results for MW-8R and MW-101, which were missing from the original report submitted in July 2017. There were no comments on the 29th SAGWMR. The updated CDs for the 28th SAGWMR were submitted in July 2018, with the 30th SAGWMR.
- July 2018: AGLC submitted a second request to reduce the frequency of sampling from semiannual to annual monitoring and reporting was included in the 30th SAGWMR. If approved, the annual monitoring events will be conducted in November of each year.
- October 2018: The EPD provided a letter indicating that they had reviewed the 30th semiannual groundwater monitoring report (SAGMR). The EPD stated that they would hold approval of the request to reduce the frequency of sampling from semiannual to annual pending their review of the report containing the November 2018 data. They also stated that all investigation-derived waste ([IDW], e.g. purge water) should be disposed of after each sampling event. GPC and AGLC met with EPD on December 7th to discuss the comments and discuss options for site closure. The EPD agreed to annual sampling beginning in May 2019 if the November 2018 results are like previous events. Several options for closure are available through the VRP. GPC and AGLC submitted a response to comments on December 10, 2018, as a follow-up to our December 7th meeting, which was primarily to document the agreements to our request for annual monitoring and to document IDW (primarily purge water) standard containment and disposal methods.
- December 2018: AGLC and GPC submitted a letter to EPD to document the discussions in the December 7th meeting and respond to the October 2018 comments.
- February 2019: GPC and AGLC met again in to review all options for closure and decide on a path forward. GPC and AGLC will seek site closure through the VRP using environmental covenants (as necessary), a revised groundwater scoring system using groundwater flow direction, and submitting an abbreviated VRP CSR.
- May 2019: A meeting was held with EPD to discuss GPC and AGLC's preferred route to closure through the VRP (potential re-scoring and/or closure with universal environmental covenants only required for the former MGP site parcel) and to review a draft outline for the CSR.

- May 2019: EPD provided a letter stating that they concur with the proposed change from semiannual to annual groundwater monitoring in the December 10, 2018 letter and indicated that the next groundwater sampling event will be conducted in November 2019 (and not in May as previously requested) and the next groundwater monitoring report will be due on January 31, 2020.
- March 2020: GPC and AGLC re-opened the discussions on VRP entry options with EPD. Based on a teleconference with EPD, EPD concurred that closure with universal environmental covenants (potentially) only required for the former MGP site parcel through the VRP was an agreeable path to closure. EPD also agreed to try and expedite the review and approval process as much as possible in order to get delisting complete prior to start of construction early next year.
- September 2020: Athens-Clark County (ACC) met internally in mid-September and agreed to include the request for site entry into the VRP on the October ACC Mayor and Commission meeting docket.
- October 2020: The ACC approval to enter the site into the VRP was obtained when the ACC Mayor and Commissioners met on October 6th. The VRP Application and VRP CSR have been drafted and will be submitted once GPC and AGLC receive a letter from ACC indicating their formal approval.
- December 2020: The letter from ACC granting their formal approval was received.
- January 2021: The VRP Application and CSR were submitted to EPD. The Public Notice of the VRP CSR was prepared and submitted to the local legal organization.
- February 2021: EPD contacted AGLC with a few initial questions on the VRP Application and VRP CSR. EPD has requested a formal response to their comments in a CSR Addendum.
- April 2021: GPC and AGLC held a site visit with EPD.
- August 2021: In order to accommodate ACC's upcoming development on the VRP Parcel (parcel A008), AGLC submitted a request to the EPD to abandon the site monitoring wells prior to approval of the VRP CSR.
- September 2021: The well abandonment request was approved by the EPD.
- September 2021: The VRP Application, which included a request for site closure, was approved on September 8th with the following comments:
    - EPD requested that GPC and AGLC enroll parcels 171B2 A002, 171B2 A008A, and 171B2 B001 as Additional Qualifying Properties and noted that these parcels will require UECs restricting residential and groundwater use before HSI Sites 10052, 10153, and 10491 can be delisted. EPD requested that GPC and AGLC provide documentation and a certification of compliance for the additional qualifying properties in the VRP CSR Addendum.
    - GPC and AGLC must provide justification for some of the J&E model input parameters. EPD requested a revised J&E model with cross sections and a table to justify all model inputs in a VRP CSR Addendum.
    - In order to meet the delineation standards of the VRP Act, GPC and AGLC must submit a figure in the VRP CSR addendum that shows the historical monitoring well network and includes the historical groundwater results to confirm that the Site has been delineated to the requirements of the VRP Act.
    - EPD will comment separately on the draft UEC.
- October 2021: EPD approved the proposed UEC language.
- November 2021: Well abandonment was completed, and additional soil samples were collected for current grain size analysis of the site soils during the field activities.
- November and December 2021: EPD, AGLC, GPC, and ACC participated in several meetings on the need for UECs on the other three non-VRP parcels (Parcels 171B2-A002, -A008A, and -B001), GPC, AGLC, and ACC agreed to put UECs on Parcels A008A and B001 now and ACC will contemplate a UEC, if required, for Parcel A002 in the future. AGLC then provided final drafts of

the UECs for Parcels 171B2-A008, -A008A, and -B001 to ACC to finalize and provide signed, stamped copies as well as necessary notifications to EPD.

- January 2022: AGLC provided final, signed, and stamped signature pages of the UECs for Parcels 171B2-A008 and -A008A to ACC for execution with EPD.
- January 2022: GPC and AGLC submitted the Well Abandonment Report letter to the EPD.
- March 2022: GPC and AGLC submitted the formal responses to EPD's comments in a CSR Addendum.
- December 2022: In an email on December 14th, EPD provided informal comments on the VRP CSR and requested that soil and groundwater Certification of Compliance statements for the three non-VRP parcels, which were added as Qualified Parcels, be submitted for each parcel. The EPD also provided minor editorial changes to the certifications and requested that the pages be revised, signed, and resubmitted for review and approval.
- March 2023: GPC and AGLC submitted a VRP CSR Addendum letter on March 24th to EPD for review and approval. The VRP CSR Addendum included the requested revised Certification of Compliance pages and information regarding the Additional Qualifying Properties for the site.
- May 2023: EPD provided a letter stating that they determined that the CSR is complete and meets the requirements of the Georgia VRP Act and they concur with the certification of compliance that the site parcels are in compliance with non-residential RRS for soil and Type 5 RRS for groundwater. Therefore, the Order on the Athens site was terminated, and the site was delisted.

<u>Augusta</u>

- March 30, 2001: The EPD approved the CAPs for the Augusta site.
- December 11, 2002: The EPD approved the BDWP for the site in accordance with the conditional approval provisions contained in the March 30, 2001 approval letter. Additionally, the EPD approved the Corrective Action Closure Reports and CSRs for all Augusta on-site and off-site unsaturated soils.
- February 24, 2006: The EPD approved the Augusta North Parcel Closure Report and concurred with the Type 5 parcel certification. The EPD directed AGLC to conduct additional bedrock groundwater investigation and characterization at Augusta in order to establish plans and select technologies for treating and/or containing groundwater impacts. AGLC proposed a "site-wide approach" consisting of a detailed Site-Wide Conceptual Model (SCM), Groundwater Model (GWM), and Feasibility Study (FS), which was accepted by the EPD.
- December 2009: The final SCM was submitted to the EPD.
- March 2010: The EPD conditionally approved the SCM, with the requirement to implement additional investigation activities.
- 2010 – 2012: Additional investigations were completed in 2010, and reporting was completed in 2011 and early 2012.
- January 2012: A long-term schedule for additional submittals as part of the "site-wide approach" was provided to the EPD.
- February 2012: An SCM Addendum, which updated the SCM with the results of the 2010 investigations, was submitted to the EPD.
- June 2012: The GWM Report was submitted in June 2012, with EPD comments received in late June 2012.
- August 2012: AGLC responded to the GWM comments.
- December 2012: The FS was submitted to the EPD, recommending excavation in one area of the site (Block C) with continued MNA and institutional controls in other areas of the site.
- October 2013: The EPD provided comments on the FS requiring a more aggressive source remedy than that proposed in the FS and requiring the submittal of a revised CAP within 90 days.

- November 27, 2013: AGLC requested an extension for the revised CAP in a letter to the EPD, which was approved by the EPD on December 6, 2013.
- April 2014: AGLC contracted with an engineering consultant to complete the revised CAP and provide remedy design and oversight services.
- May 15, 2014: The EPD agreed that the Augusta site could effectively be managed under the VRP. Acceptance into the VRP was contingent on the execution of a new Consent Order moving the site into the VRP, as well as the submittal of a VIRP by August 29, 2014, in place of the CAP.
- June 27, 2014: A new proposed Consent Order (EPD-VRP-011) was provided to AGLC via a transmittal letter from the EPD.
- July 23, 2014: AGLC signed the new Consent Order and provided it to the EPD.
- August 6, 2014: AGLC submitted an initial VIRP Application Form and Checklist with the associated VRP application fee.
- August 11, 2014: The Consent Order was posted for public comment; the public comment period closed on September 10, 2014.
- August 28, 2014: In accordance with the agreed upon VRP process between AGLC and the EPD, the VIRP was provided to the EPD.
- September 23, 2014: The EPD executed the Consent Order.
- December 3, 2014: The EPD accepted the Augusta site into the VRP via a transmittal letter, and, in a separate letter of the same date, provided comments on the August 2014 VIRP. The EPD required that Semiannual VRP Status Reports, including results of semiannual groundwater monitoring, be provided are provided to EPD on or before June 1st and December 1st each year.
- March 24, 2016: AGLC met with representatives of the EPD to provide an update on the status of the project and review objectives for the site going forward.
- February 27, 2017: AGLC met with representatives of the EPD to provide an update on the status of the project and discuss schedule implications as they relate to the VRP.
- July 27, 2017: AGLC attended hearing on the Certificate of Appropriateness (COA) that was submitted to the Historic Preservation Committee for demolition of the former church structure. The COA was denied at the time of the hearing.
- September 2017: AGLC appealed Augusta Historic Preservation Committee's denial and, making use of the mandatory mediation process set forth in the Ordinance, reached a series of agreements for the future of the church to facilitate remediation in the Summer of 2018
- May 2018: AGLC met with the EPD on May 14, 2018 to update them on the status of the design and remediation. In that meeting, AGLC:
    - Notified the EPD that AGLC was in the process of purchasing the former gas station property.
    - Obtained concurrence from EPD on performance criteria and remediation approach.
    - Discussed the need to submit an extension request for the VRP schedule. EPD indicated that an extension request is not needed at this time, but a formal request may be needed for Director Approval, if deemed necessary.
    - Discussed the fact that AGLC has previously certified soil to meet the applicable RRS for the various properties. AGLC requested concurrence from EPD that excavation confirmation sampling for unsaturated soils would not be required as this phase of work is specifically for saturated zone remediation. EPD acknowledged that if they approved the soil certification for the parcel(s) that AGLC certified, then excavation confirmation would not be required. EPD requested a copy of any previous approvals for soil certifications that they had provided in the next VRP Progress Report submittal. A copy of the EPD approval letters for the Operable Units (OU) 1 & 2 and the Third Level Canal Closure Report, which includes EPD approval of AGLC certifications for unsaturated zone soils, was provided in the December 1, 2018 SA VRP Progress Report (Eighth Semiannual VRP Progress Report).

- June 2018: EPD provided comments on VRP Semiannual Progress Reports 5, 6, and 7, and Semiannual Corrective Action Effectiveness Reports 21, 22, and 23 and noted that all of the preceding documents were submitted to EPD pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100. The letter also indicated that AGLCs response to EPD's April 27, 2019 comments were satisfactory, and that EPD should be notified after installation of ISS columns (scheduled for late July 2018) had begun. AGLC notified EPD as appropriate.
- October 2018: AGLC held a site visit with EPD in mid-October to show them site progress and ISS operations.
- December 2018: A copy of the EPD approval letters for the Operable Units (OU) 1 & 2 and the Third Level Canal Closure Report, which include EPD approval of AGLC certifications for unsaturated zone soils were provided in the Eighth Semiannual VRP Progress Report.
- January 31, 2019: AGLC held a meeting with EPD to discuss the validity of using the wet/dry test as a method of evaluating the performance of the ISS mass. In that meeting, EPD concurred that the wet/dry test is not a reliable method of evaluating the performance of the ISS mass in the ground. Therefore, while AGLC continued to run the wet/dry test for qualitative purposes, AGLC discontinued using it as a "performance standard" (i.e. not as a pass/fail) or as a trigger for re-mixing columns based on unfavorable results, provided the key performance criteria (UCS and K) were met.
- June 18, 2019: AGLC held a meeting with EPD to discuss strategies for site closure through groundwater certifications and/or use of covenants as well as the structure of the VRP CSR.
- July 2019: The EPD provided correspondence that the Georgia Underground Storage Tank Management Program (USTMP) had received a properly certified UST Closure Report prepared by Wood dated November 29, 2018. In the letter, the USTMP determined that no further action is required for the referenced release based on the current requirements of the Georgia Underground Storage Tank Act, the Georgia Rules for Underground Storage Tank Management (GUST Rules), and the data submitted.
- September 2019: The EPD provided correspondence on the *Voluntary Remediation Program (VRP) Semiannual Progress Reports* (SAPRs) *8 and 9* dated November 30, 2018 and May 31, 2019, respectively. The comments were general in nature and primarily provided concurrence with past actions or future plans.
- December 2019: AGLC met with EPD in mid-December to discuss our proposal for the point of demonstration (POD) monitoring plan to include only select wells in the Galliard and bedrock groundwater zones in support of an empirical model of plume stability demonstrating compliance with cleanup standards under the VRP. As part of the proposed POD monitoring, four (4) Galliard wells (i.e., MW-306D, MW-12, MW-304, and MW-505D) and three (3) bedrock/transition zone wells (i.e., MW-318, MW-306BR, and MW-500BR) were proposed to be sampled over two monitoring events (i.e., January 2020 and July 2020). In an email dated December 27th, EPD agreed to this proposal, but also requested that wells MW-311 and MW-306TZ be included in the POD monitoring. As per EPD's request, other wells not included for analytical testing as part of the POD monitoring will be gauged and used for groundwater elevation contouring to evaluate whether localized groundwater flow has been altered by the solidified ISS mass after ISS completion. EPD also noted that if altered groundwater flow directions are determined and/or increasing constituent trends are noted over the course of the monitoring activities, then expansion/extension of the monitoring program may be necessary.
- February 2020: A meeting was held with EPD to review the Type 5 marker requirements, per parcel, prior to preparing a draft of the language to submit to EPD for review. The EPD confirmed that each parcel on which ISS was installed will require a marker.

- November 2020: EPD provided comments on the 10th and 11th Semiannual VRP Status Reports. These comments were general in nature and indicated that their review was complete.
- December 2020: EPD provided comments on the 12th Semiannual VRP Status Report, which were general in nature and indicated that their review was complete. The EPD agreed with AGLC's request to discontinue additional monitoring activities and proceed with the preparation and submittal of a CSR documenting that soil and groundwater meets the provisions of the VRP Act.
- June 2021: The VRP CSR was submitted, which included a request for closure and delisting.
- December 2022: In an email dated December 13th, EPD provided questions they had on the Compliance Certifications included with the VRP CSR. Their main question was why two of the parcels sub-listed as part of the original HSI listing for the site were not listed as VRP parcels, nor included on the certification page submitted with the VRP CSR. AGLC's response stated that the soil on these parcels was certified in 2009 in the OU3 Canal Completion/Compliance Status Report to a non-residential RRS and the certifications were subsequently approved. Groundwater was either deemed to meet residential standards based on data collected on the parcels or on surrounding ones.
- March 2023: The questions pertained to the draft UECs and proposed designations for the abutting parcels of those in need of a UEC. AGLC responded with clarifications on the UEC language and adjusted parcel designations as required.
- June 2023: EPD provided concurrence with the revised UEC language and other responses that AGLC sent to EPD in a May 2023 email, as well as additional questions on parcel designations included with the VRP CSR. The questions pertained to the proposed designations for abutting parcels of those in need of a UEC. AGLC responded with agreement on the changes, with the exception of one parcel subject to further correspondence in August.
- August 2023: EPD provided additional questions on the designation for one parcel included with the VRP CSR pertaining to the need of a UEC. AGLC responded with agreement on this final change. The updated parcel designations will be adjusted on Table 1 and figures, which will be sent to EPD for approval.

<u>Brunswick</u>

- 2000: The EPD approved the CAP for the Brunswick site.
- April 14, 2004: The EPD reclassified Brunswick as a Class V site under HSRA. The EPD approved an amended CAP for the Brunswick groundwater, which has been implemented, and the closure report associated with that implementation has been approved with MNA as the ongoing groundwater remedial technology.
- September 2011: Georgia Power performed a high-volume groundwater extraction event in the one well with persistent naphthalene concentrations above the RRS to evaluate if the schedule for site closure could be expedited.
- October 2011: The extraction event resulted in higher concentrations of naphthalene.
- March 2012: The results of the extraction event suggested that additional impacts might have been mobilized by the extraction event.
- The contractor submitted a plan to AGLC and Georgia Power for focused groundwater sampling with a direct push rig around monitoring well MW-6R. The work plan was reviewed and approved; however, the work was not implemented because groundwater concentrations decreased in the well.
- May 2016: Naphthalene concentrations have remained below the RRS for the past two sampling events (both September 2015 and March 2016), meeting the requirements of the June 2006 CAP. Therefore, on May 25, 2016 correspondence, Georgia Power Company and AGLC requested the termination of the groundwater monitoring program at this site and that the site be delisted from the HSI.
- May 5, 2017: The EPD approved the site delisting.

- July 2017: Well abandonment activities and the first annual visual reconnaissance survey in accordance with the CAMP were completed in June 2017. The CAMP Report was submitted in July 2017. The annual surveys are due in June of each year, with the CAMP Report to be submitted within 60 days of visual reconnaissance.
- November 2018: The EPD provided a letter stating that they had reviewed the 2017 and 2018 Annual Visual Reconnaissance Reports dated July 19, 2017 and July 26, 2018, and the Monitoring Well Abandonment Report dated July 10, 2017. EPD found them to be satisfactory and there were no comments.
- August 2019: The EPD provided a letter stating that they had reviewed the 2019 Annual Visual Reconnaissance Report dated July 28, 2019 and found it to be satisfactory.
- November 2021: The EPD provided a letter stating that they had reviewed the 2021 Annual Visual Reconnaissance Report dated July 30, 2021 and found it to be satisfactory.

<u>Griffin</u>

- 2000: The EPD approved the CAP for the Griffin site.
- October 2006: The EPD approved an amended groundwater CAP, and AGLC was directed to further improve the active remedy to deal with recalcitrant residues in the groundwater zone.
- August 2008: A revised Groundwater CAP Addendum for Griffin was approved by the EPD to facilitate active remediation of residuals.
- July 2009: The completion of remediation activities was documented in the July 2009 Remedial Action Completion Report for Excavation Activities.
- April 2012: AGLC completed delineation work in the area of upgradient well MW-14R; this work was based on sampling data indicating elevated naphthalene concentrations in samples from MW-14R. A zone of soil impacts was encountered at approximately 7 to 9 feet below ground surface (bgs) in some borings.
- Two additional wells were installed to complete delineation activities. The results from the initial sampling and subsequent events indicated no presence of MGP constituents in groundwater in these new wells.
- May 2013: The EPD indicated at the Public Service Commission (PSC) meeting that site closure may not be granted without cleanup of the remaining source in the area of upgradient well MW-14R.
- May 2013 – November 2015: Concentrations of naphthalene in upgradient well MW-14R increased in 2013, coinciding with a higher groundwater table. The naphthalene concentration decreased in the following two 2014 sampling events, increased in May 2015, but decreased in November 2015. Given the intermittent nature of the exceedance, the need for additional source removal is being re-evaluated. As these impacts were observed in the vadose zone only, MNA or an enhancement to MNA should still be considered a valid remedy for groundwater after the excavation or other localized remedy is completed. The VRP may be applicable for Griffin.
- May - November 2016: Results of the May 2016 groundwater sampling event indicate that naphthalene concentrations decreased in upgradient well MW-14R compared with the 2013 through 2015 results. Naphthalene concentrations were further reduced to below detection limits in the November 2016 and May 2017 sampling events but increased again in November 2017. Variability appears to be associated with higher groundwater elevations.
- July 2016: A request to reduce the sampling frequency from semiannual to annual was included in the July 2016 Annual Groundwater Monitoring Report. The EPD responded that semiannual groundwater monitoring should continue. The request was reiterated in the January 2017 monitoring report, but a response from EPD has not been received to date.
- May 2018: A meeting was held with EPD to discuss the potential for Site closure through the VRP. EPD seemed very accepting of moving the site into the VRP.

- June 2020: AGLC submitted a proposed draft VRP Consent Order (CO) for the site to EPD for their review and approval prior to submitting an application into the VRP.
- October 2020: Since submitting the draft CO, AGLC discovered additional information regarding a new HSI site for an upgradient source of the PCE impacts on site. AGLC presented this information to the EPD in early October and will set up a meeting to discuss these new findings and site closure options with EPD this quarter. AGLC may be able to close the site without entry into the VRP, but that decision is pending input from EPD.
- February 2021: AGLC held a virtual meeting with EPD to discuss the site status, recently listed upgradient HSI site, and entry into the VRP. It was agreed that Griffin is a good candidate for the VRP.
- May2021: The VRP Application was submitted to EPD.
- June 2021: AGLC held a site visit with EPD to review the site remedial history and VRP Application. EPD indicated that they had a pared-down version of the VRP Consent Order to use for the site and sent that to AGLC on August 13th. As a follow-up to the site meeting, AGLC provided additional information to EPD on historical off-site groundwater elevations and PCE concentrations per their request.
- August 2021: AGLC received and reviewed the EPD's pared-down version of a VRP Consent Order and provided minor edits/comments back to EPD on August 19th.
- November 2021: EPD provided their comments on AGLC's August 2021 suggested edits to the VRP CO, which AGLC accepted with one minor change.
- December 2021: AGLC transmitted the final proposed edits to the VRP Consent Order (CO), which EPD ultimately approved. EPD provided a letter transmitting the VRP CO together with comments regarding the VRP Application. Upon receipt of the signed CO, EPD will initiate the Public Notice process, which will expire in thirty days once posted on EPD's website. If no comments are received during the Public Notice period, EPD will sign the CO and transmit the fully executed VRP CO to AGLC, which will officially accept the Griffin site as a participant in the VRP.
- January 2022: AGLC submitted the signed VRP CO for signature to EPD for Public Notice and execution. The VRP CO was put out for public notice on January 31st.
- April 2022: On April 1st, EPD provided a letter to AGLC stating that no comments were received on the VRP CO during the public comment period; therefore, the Griffin MGP site was accepted into the VRP. The first semiannual VRP progress is to be submitted within 6 months of the letter, which will include the submittal of the VRP CSR.
- April 2022: On April 19th, AGLC submitted a response to the December 21, 2021 EPD comments in an effort to clarify the proposed site constituents of interest and acknowledgement of the requirement for providing evidence of soil delineation.
- May 2023: AGLC submitted the VRP CSR to the EPD.
- November 2023: In an email dated November 28th, EPD provided comments on the draft UEC, which requested the additional language to include the need for long-term monitoring (annual visual site inspections) and vapor intrusion assessments upon development. AGLC responded by email on December 6th, stating that the nature of the proactive language in the proposed UECs should preclude the need for long-term monitoring. In response, EPD requested the language that AGLC considered to be proactive, which was sent on December 7th.
- December 2023: On December 20th, EPD provided a response to AGLC's question on the need for long-term monitoring for the Griffin site with agreeing that it might not be necessary for this particular site but reserved the right to require it for other sites. The language on vapor intrusion was minimized. AGLC responded on December 21st requesting a call or meeting in person to discuss EPD's position on the UEC language, mainly as it relates to other sites.

Macon

- January 5, 2001: The EPD approved the CAP for the Macon site.
- August 25, 2009: The EPD approved AGLC's Notice of Intent for ISS in the southeastern portion of the Eastern Portion of the site in a letter.
- October 2009: Additional investigation results for the MW-09 area (a.k.a. Western Portion) and southeastern portion of the site were submitted to the EPD. In response to the new information, the EPD directed AGLC to either resume with the current CAP requirements or to modify the current CAP to propose an alternate corrective action for the Western Portion.
- April 2010: The Remedial Action Completion Report was submitted for the ISS work in the Eastern Portion.
- November 2010: The EPD sent a letter requiring additional bedrock wells in the Eastern Portion of the site and an interim remedial action at monitoring well MW-111D, where dense, non-aqueous phase liquid (DNAPL) had been observed.
- January 5, 2011: AGLC provided a response to the November 2010 EPD letter.
- Q1 2011: The requested work was completed and AGLC performed an additional data gap investigation in the Western Portion, which is now understood to be a separate MGP site.
- Q2 2011: A focused feasibility study (FFS) to address impacts in the Western Portion, as well as a smaller area in the Eastern Portion, the MW-101 Area, was submitted.
- January 2012: The EPD responded to the FFS agreeing to the proposed remedy of ISS and excavation and requiring that bedrock groundwater also be addressed in the upcoming CAP Addendum.
- August 13, 2013: AGLC provided detailed schedules for the CAP Addendum submittals.
- February 2014: The Macon Alluvial Groundwater CAP Addendum for the Western Portion and MW-101 Area was submitted.
- October 14, 2014: As part of the plan to enter the VRP, the VIRP was submitted to the EPD for the entire site. The VIRP included the VRP application, and the CAP Addendum prepared for the Western Portion and MW-101 Area as appendices to the VIRP. The VIRP also included the DNAPL investigation, bedrock investigation, and bedrock groundwater monitoring work plans.
- October 27, 2014: AGLC submitted a revised Consent Order (EPD-VRP-012) specific to the AGLC Macon site.
- January 2015: The EPD executed the new Consent Order, transitioning the Macon site into the VRP.
- May 21, 2015: The EPD approved the October 2014 VRP and indicated that semiannual progress reports are to be submitted May 21 and November 21 each year.
- May 26, 2015: The EPD provided technical comments to the October 2014 VRP, which are to be addressed in subsequent semiannual reports.
- May 23, 2016: The 2nd VRP Semiannual Progress Report was submitted to the EPD. The report included the Corrective Action Completion Report for the Western Portion, and the groundwater monitoring report for samples collected in April 2016, following completion of the corrective action.
- November 21, 2016: The 3rd VRP Semiannual Progress Report was submitted to the EPD and recommended that the dissolved phase and DNAPL investigations be suspended, and that vacuum enhanced fluid recovery (VEFR) events be discontinued due to observed increases in groundwater concentrations in downgradient wells.
- February 21, 2017: The EPD provided comments on the 1st, 2nd, and 3rd VRP Semiannual Progress Reports in a letter dated February 21, 2017. The EPD agreed that no further evaluation of the Ocmulgee River surface water, sediments or armoring would be required, but that environmental covenants would require provisions for annual reporting on observed conditions in the river and specify conditions [e.g., significant rainfall (10-year event), construction activities in the river, dredging of the river, etc.] that could potentially disturb TLM or its overlying cover and

would trigger a river bottom survey of the armored area associated with the Upper Outfall. On March 24, 2017, AGLC responded that the river issues should be closed since the remediation requirements under HSRA have been met. In addition, AGLC stated that the river bottom is sovereign land lying outside the boundaries of any deeded real estate parcel, the Ocmulgee River sediments are not amenable to a restrictive covenant, and thus, the river sediments were not included as a qualifying parcel under the VRP. The EPD letter also requested studies to address potential vapor intrusion at two buildings along 7th Street, due to the presence of NAPL in bedrock.

- March 22, 2017: AGLC responded that the groundwater in alluvial wells upgradient, downgradient, and surrounding these buildings are not and have never been impacted, so vapor intrusion evaluation is not warranted. The EPD agreed that additional VEFR events would not be required, subject to results of future groundwater monitoring. A reduction of analytical requirements was also approved. There were no comments to the CACR; therefore, AGLC assumes that the CACR was approved as submitted.
- June 22, 2017: AGLC met with EPD to discuss the February 2017 comment letter, the March 2017 AGLC response letter and the extent to which groundwater flow and transport modeling will be required.
- February 2018: AGLC met with EPD to review the language for the Universal Environmental Covenants (UEC) for all parcels requiring a UEC. AGLC began preparation of drafts of UECs for all parcels in January and submitted those to EPD and the property owners for review, concurrently, in Q2 of 2018. Resolution of the issues from the June 22, 2017 meeting was achieved with EPD's concurrence on AGLC's position in their November 14, 2019 letter (see more details below).
- August 2018: VRP CSR submitted, in which AGLC requested no further groundwater monitoring, closure, and delisting.
- November 2019: The EPD provided comments in a letter dated November 14, 2019 on the *Voluntary Remediation Program (VRP) Compliance Status Report* (CSR). AGLC received the comments on November 18th. The comments were primarily regarding past and current certifications, deed restrictions, and covenants. The comment letter also included concurrence with AGLC's position in regard to responses to the comments on the 4th Semiannual Progress Report regarding additional river monitoring or vapor intrusion investigations, which was discussed during the meeting with EPD held on June 22, 2017. EPD agreed that no further river monitoring or vapor intrusion investigations were required. Draft responses were submitted to the EPD in April 2020.
- February 2020: AGLC met with EPD to discuss the response to comments and edits to the certifications and UEC requirements. AGLC also inquired on the timing for comments on the UECs as development of the Macon Urban Development Authority (MUDA) and Marillac properties is moving forward. AGLC requested priority review on those properties and EPD requested that AGLC resubmit those in redline for expedited review. The redlined UECs were resubmitted to EPD on February 11, 2020.
- March 2020: AGLC received comments on the draft UECs for the MUDA and Marillac properties.
- April 2020: The response to EPD comments and VRP CSR Addendum were finalized and submitted to the EPD on April 2nd. The Public Notice was prepared, and an Affidavit of Publication was submitted to EPD to document the publication.
- June 2020: Upon preparing the final UECs for the MUDA and Marillac properties for submittal to EPD, AGLC learned that the MUDA property was being transferred to the Macon Housing Authority (MHA) in June; therefore, AGLC postponed submitting the revised UECs for the former MUDA and Marillac properties until the property transaction was complete and an updated property description and warranty deed was received.
- July 2020: Per EPD's request, AGLC submitted the revised UECs for the Housing Authority of Macon-Bibb County (HAMBC) and Marillac properties, along with the exhibits, to EPD for a final review after their comments were incorporated. The UECs were subsequently approved.

- September -December 2020: AGLC submitted the approved UECs to the property owners for signature and the required UEC notices to adjacent property owners and local governmental bodies to provide notifications of receipt to EPD. Due to recent ownership changes, the UECs were updated with the new property owner names and Quitclaim deed showing the transfer of the property and resubmitted to EPD for review. The Depaul USA, Inc UEC was subsequently approved.
- January 2021: The revised, approved UEC was sent to Depaul USA, Inc. for signature and the revised UEC notices to the adjacent property owners and local bodies of government for review and comment.
- February 2021: The final, signed UECs for both the HAMBC and Depaul USA, Inc. have been sent to EPD for execution.
- May 2021: Electronic copies of the executed UECs for the HAMBC and Depaul USA, Inc. properties were received via email.
- August 2021: The original hard copies of the executed UECs for the HAMBC and Depaul USA, Inc. properties were received and sent for court recording by Macon-Bibb County.
- October 2021: In order to accommodate the HAMBC's pending development, AGLC submitted a request to EPD to abandon the monitoring wells on and immediately adjacent to the HAMBC property prior to approval of the VRP CSR. The request was approved on October 22, 2021.
- November 2021: The court-executed UECs for the HAMBC and Depaul USA, Inc. properties were received from Macon-Bibb County.
- December 2021: Copies of the court recorded UECs for the HAMBC and Depaul USA, Inc. properties were submitted to EPD.
- January 2022: The required UEC notices were sent to adjacent property owners and local governmental bodies while required notifications of receipt were provided to EPD.
- March 2022: AGLC submitted the Monitoring Well Abandonment Report for the HAMBC and Depaul USA, Inc. parcels to the EPD and the report was approved on March 31st.
- April 2022: EPD provided a letter on April 6th stating that they concur with AGLC's Certifications of Compliance that the specified parcels in the VRP CSR Addendum are in compliance with the specified RRSs or will be in compliance upon execution and court-recording of environmental covenants. The letter also stated that delisting of the HAMBC and Depaul USA, Inc. has begun with recording of the UECs for their properties.

<u>Macon 2</u>

- January 5, 2001: The Macon 2 site was added to the program with the EPD's decision to list the site on the HSI.
- December 19, 2003: The EPD made a determination that a CAP was required for the Macon 2 site and issued a letter concurring with the CSR.
- September 2005: Following submittal of a CAMP for the Macon 2 site, the site was removed from the HSI.
- September 2019: AGLC and GPC received a package of information from an attorney for Macon-Bibb County (MBC) and Macon Urban Development Authority (MUDA) indicating that they have been actively exploring residential site development on this parcel. In May 2015, MBC and MUDA submitted an application into the VRP. The remedial plan included conducting additional investigation to determine the extent needed to certify site soils to residential and if necessary, excavation to remove soil that did not meet residential standards. The site was accepted into the VRP in 2015, investigation and excavation activities were conducted from 2014 to 2018. The VRP CSR was submitted in November 2018, with an amendment in April 2019. In May 2019, a new UEC was executed that listed only MBC and MUDA as "Interested Parties" and excluded AGLC and GPC. AGLC and GPC are reviewing all relevant correspondence from 2014 to date in order to understand how the proposed UEC and agreement will affect the previously approved Cost

Agreement and Restricted Covenants. AGLC and GPC will stay engaged in this process because the City is seeking residential development, but the site was certified to the non-residential screening values. AGLC involvement is expected to be more intensive than previously anticipated.

- July 2021: AGLC and GPC met with the new Mayor and a MUDA representative to review the site status and reiterate the options to resolve the issues with future site development, the UEC executed by the City, and the original covenant, which still remains in effect.
- January 2022: AGLC and GPC provided a draft term sheet to MUDA in an effort to obtain a binding agreement to replace the 2005 Agreement Regarding Past Costs and Restrictive Covenants.
- February 2022: MUDA's board approved the parameters of the term sheet at its meeting on February 10th; therefore, all parties are ready to proceed towards a definitive agreement with the City of Macon.

Rome

- 2000: The EPD approved the CAP for the Rome site.
- April 14, 2004: The EPD reclassified Rome as a Class V site under HSRA.
- 2007: The EPD directed AGLC to evaluate alternative technologies for impacted groundwater at the Rome site and determined that an alternative remedy for groundwater may be required following a Technical Review analysis.
- May 2008: Based on an EPD request to pursue more aggressive groundwater remedies at the Rome site, an Enhanced Bioremediation Pilot Test Work Plan was submitted.
- September 2008: The Enhanced Bioremediation Pilot Test Work Plan was approved.
- December 2009: As a follow-up to the completion report for the pilot study in Rome, an FFS of remedial alternatives was submitted to the EPD concluding that MNA was the appropriate remedial technology for the Rome site.
- March 2010: The EPD disagreed and responded that AGLC must evaluate and choose one of three alternatives: 1) making application to the VRP and propose new RRS; 2) revise the CAP to Type 5 RRS; or 3) implement an approved contingency corrective action.
- June 2010: AGLC notified the EPD that it would submit an application to enter the Rome former MGP site into the VRP.
- September 2010: The VRP application was submitted.
- March 14, 2011: The EPD provided comments to AGLC on the VRP application.
- May 16, 2011: A revised application package was submitted to the EPD.
- January 2012: The EPD responded with a conditional approval for the revised VRP application.
- March 2013: AGLC met with the EPD to resolve the outstanding comments and gain consensus on the overall closure approach.
- December 6, 2013: The Rome VRP CSR was submitted to the EPD.
- April 30, 2014: The EPD provided comments on the VRP CSR. The EPD requested that field data be collected to support the vapor intrusion (VI) modeling conducted for the VRP CSR.
- June 2014: The VI sampling was conducted, and the results indicated no exceedances of the calculated non-residential screening values, but some exceedances of the residential soil screening level. The initial soil screening levels were calculated using attenuation rates based on chlorinated solvents. However, due to the residential exceedances, a revised method of calculating a soil screening level based on more recent (2013) attenuation rates for hydrocarbon underground storage tank (UST) sites was evaluated. This alternate method had not yet been used on MGP sites.
- The EPD agreed with the use of the hydrocarbon attenuation data but indicated oxygen data would need to be collected from the soil gas to validate the model inputs. The soil screening levels were recalculated using attenuation rates based on petroleum hydrocarbon data. The soil gas sample results were compared to the revised soil screening levels and all results were below the calculated residential concentrations.

- August 2014: Additional soil gas samples were collected for oxygen (O2), carbon dioxide (CO2), and methane, and the results supported the revised model inputs.
- August 15, 2014: The VI evaluation summary was finalized, and the VRP CSR Addendum was submitted.
- November 2014: The EPD approved the VRP CSR and VRP CSR Addendum.
- The draft CAMP was submitted with the VRP CSR Addendum, as per the EPD's request in their comment letter. The River Operations, Maintenance, and Monitoring (OM&M) Plan was submitted with the CAMP as an attachment. AGLC proposed two additional river surveying events in 2016 (completed) and 2021, in addition to (as warranted) any rainfall-triggered events in the OM&M Plan.
- March 2015: The UECs were signed and submitted to the EPD for execution, and the required notification letters were submitted to abutting property owners for review and comment.
- May 2015: The UECs were recorded at the City of Rome.
- August 2015: The EPD issued a Delisting Letter, reclassifying the site as a Class III site and removing it from the HSI. Monthly rainfall monitoring, annual CAMP inspections, and long-term maintenance and monitoring for the sediments in the Oostanaula River will continue.
- September 30, 2016: The 2016 Oostanaula River Bottom Survey results were submitted to the EPD. No scouring requiring re-armoring was detected.
- July 26, 2017: EPD provided comments on the 2016 *Annual CAMP Report* and *2016 Elevation Survey of Oostanaula River Bottom*. EPD stated that that both documents were satisfactory. A request for AGLC to continue to submit an Annual CAMP Report was included in their letter. EPD also stated that an additional river survey is due to be conducted in September 2021, pursuant to the Long-Term Operations Maintenance & Monitoring Plan for Sediments in the Oostanaula River, included within the EPD-approved August 14, 2014, CSR Addendum.
- January 2018: EPD provided comments on the 2017 *Annual CAMP Report* and AGLC provided responses in a letter dated February 15, 2018.
- October 2018: The EPD provided a letter stating that they had reviewed the 2018 Annual CAMP Report and it was satisfactory.
- January 2020: The EPD provided a letter stating that they had reviewed the 2019 Annual CAMP Report and it was satisfactory.
- November 2020: EPD provided a comment letter regarding the 2020 Annual CAMP Inspection Report stating that the report was satisfactory.
- December 2021: The last and final River Bottom Survey Report was submitted to EPD, which included a request for no further action in regard to river survey monitoring for the site.

<u>Savannah</u>

- January 5, 2001: The EPD approved the CAP for the Savannah site.
- January 17, 2003: The EPD approved, by letter, the remediation concepts as contained in a BDWP for certain off-site properties in Savannah, in accordance with the conditional approval provisions contained in the January 5, 2001 approval letter.
- December 3, 2003: The EPD approved the Savannah BDWP for the Phase II On-Site Areas and Off-Site Properties.
- April 1, 2005: The EPD approved the final Savannah on-site Soil Closure Report and property certifications.
- April 22, 2005: The EPD was notified that Corrective Action Completion under the Savannah CAP and BDWP had occurred.
- June 28, 2006: The EPD approved the Closure Reports for the Savannah Site – Marriott/City Property and Savannah Electric Property, and the EPD approved the Savannah CAMP.
- The EPD continues to review and approve the required CSRs and Completion Reports as they are prepared and submitted upon completion of field activities. Review by the EPD of those

documents may lead to further investigation or remediation requirements, including those under or triggered by the CAMP.

- September 21, 2016: The EPD issued a comment letter regarding the 2016 Annual Survey Report. AGLC met with the EPD in November 2016 to discuss the responses to the EPD's comments and the path forward.
- December 2016: Repairs to the telemetry system were made to allow remote access to flow data. During the repairs, it was discovered that a sensor on the flow meters, which converts discharge into gallons, was malfunctioning and required replacement.
- January 2017: Replacement of flow meter sensors was completed.
- August 2017: Data evaluation of current groundwater elevations in existing groundwater pumping wells was initiated for use in design and evaluation of potential revisions to the system design. Transducers with data-logging capability were installed in the two existing pumping wells (one shallow and one deep) to determine current groundwater levels in the area. That data was summarized for use in the system redesign evaluation.
- September 2017: The discharge pump (to the City of Savannah lift station) and control panel were damaged during Hurricane Irma that passed through the area. Repairs were completed in late December 2017.
- January 2017: AGLC received the 2018 Discharge Permit that included an increased permit duration to a two-year standard (through December 2020) and a reduction to the frequency of system effluent sampling to semiannual based on the lack of detections for many years.
- January 2018: The pumps and control system repairs were completed in early January 2018. The groundwater interceptor trench and discharge pumps operated during the quarter, with flow being estimated until the flow meters were repaired in March 2018.
- February 2018: AGLC received the 2018 Discharge Permit that included an increased permit duration (through December 2020) and a reduction of system effluent sampling frequency to semiannual based on the lack of detections for many years.
- April 2018: Evaluation of options to return the system to full operational status was provided to AGLC in a feasibility study. The preliminary evaluation of current groundwater levels in the existing pumping wells was completed in March, which included a compilation of the current site groundwater levels and comparison to historical levels. The data indicated that the current site groundwater levels are below the historical high groundwater levels and more importantly, well below the top of the interceptor wall (>15' in the shallow zone), even during hurricane conditions (Hurricane Irma). Therefore, AGLC concluded that the system does not need to be restored to full operation status (i.e. pumping wells and system repaired and operational) to be effective. AGLC planned to submit a Corrective Action Plan (CAP) with the proposed, revised system design to the EPD in 2018 after initial comments are received on the potential to shut the system down entirely (see discussion below). Also, since the effluent data has been below detection limits for over 10 years, AGLC will request no further action since the City of Savannah has indicated in recent conversations that that would be amenable to this approach.
- May 2018: A meeting was held with EPD 2018 to discuss revised system design options, with the preference being no further action and to shut the system down. At a minimum, the system design should be reduced to a gravity collection system only. Based on the groundwater elevation study completed and the continued lack of detections in effluent groundwater samples, the EPD seemed to be in concurrence with a potential shutdown of the system, but no resolution was provided in the meeting. AGLC anticipated comments from EPD on the path forward; to date comments have not been received.
- April 2019: In response to a question on whether EPD would provide feedback on our approach for closure, the EPD stated that it will not comment on our informal proposal for the path forward for closure unless a formal modification request is submitted.

Valdosta

- 2000: The EPD approved the CAP for Valdosta.
- January 24, 2003: An addendum to the Valdosta RI was filed.
- May 20, 2005: The addendum to the Valdosta RI was updated.
- August 2005: A response to comments was filed.
- December 12, 2003: A CAP Addendum covering long-term groundwater measures was submitted to the EPD.
- August 2005: The CAP Addendum was approved.
- July 8, 2009: The EPD approved reductions in the groundwater monitoring program for Valdosta in a letter.
- November 2009: The CAP Addendum outlining the reductions in the groundwater monitoring program was submitted.
- February 9, 2011: The EPD notified AGLC in a letter that CAP requirements for the Valdosta groundwater had been met and that groundwater monitoring could be discontinued.
- June 2012: AGLC abandoned the monitoring wells and filed final parcel certifications for the site with the exception of one parcel.
- September 11, 2012: With the exception of the right-of-way for the former Genesee & Wyoming parcel, the EPD approved the certification for all other parcels. The parcels with EPD-approved certifications were subsequently removed from the HSI list.
- Due to a lack of response from the owner, Genesee & Wyoming, on their parcel at Valdosta, AGLC informed the EPD that attempts to obtain approval from the property owner were unsuccessful and that AGLC would have no further obligation regarding the Genesee & Wyoming parcel. The EPD could reach out to Genesee & Wyoming independently.
- February 2016: AGLC contacted legal counsel for Genesee & Wyoming (new owner of the former Valdosta Southern Railroad parcel) again, in an effort to gain approval to certify that parcel as non-residential. The property owner approved certifying the parcel as non-residential.
- October 24, 2016: After working with legal counsel for Valdosta Railway, L.P., ([VRLP], a Genesee & Wyoming Railroad Services, Inc. subsidiary), AGLC submitted a Certificate of Compliance to the EPD for the parcel to be delisted.
- October 5, 2017: AGLC received a preliminary list of questions from the EPD on the final Certification submitted and delisting request, which indicated that the universal environmental covenants (UECs) will be required for the AGLC-owned and the VRLP parcels. As a result, these parcels were not delisted at the same time as the others. AGLC is prepared to submit UECs for these parcels when the official letter from the EPD is received on parcels where UECs are required.
- February 2018: EPD requested documentation that provided basis for previous soil and groundwater certifications and site closure.
- April 2018: AGLC submitted copies of the Remedial Action Completion Report (RACR) and related correspondence to the EPD that indicated RACR approval, soil and groundwater certification approvals, or parcel delisting status.
- February 2019: EPD provided comments on the *Compliance Certification of October 24, 2016: Former Valdosta Southern Railroad Parcel*, in which EPD requested additional back-up and documentation for previous certifications in order to approve all certifications and allow for site delisting.
- August 2019: AGLC submitted responses to EPD's comments on the final delisting/certification request and associated back-up documents to the EPD. Comments are anticipated in the first quarter of 2020.
- February 2020: In a letter from the EPD, the EPD concurred that the Valdosta former MGP site (HSI Site Number 10113) has been fully delineated, and that corrective action is complete for Tax Parcel 0119D 068 (AGLC parcel) in accordance with Type 4 RRS for soil and groundwater. In addition, EPD agreed that corrective action is complete for Tax Parcel 0120C 202 (currently owned

by Georgia-Southern Florida Railroad) in accordance with residential cleanup standards for soil and groundwater (pursuant to the June 30, 2009, letter from Jim Brown of EPD to Tim Goodson of AGL) and for the former Valdosta Southern Railroad parcel in accordance with Type 4 RRSs for soil and Type 1 RRSs for groundwater. Accordingly, the compliance certifications for the aforementioned parcels were approved.

- April 2020: In order to remove the site from the HSI, EPD requires that AGLC implement a UEC for Parcel 0119D 068. The UEC will designate future land uses of that parcel as non-residential only and restrict groundwater use. The draft UEC was finalized and submitted to EPD for review on April 16, 2020.
- June 2020: In an email, EPD indicated that they had finished reviewing the text of the draft UEC and they will request minor changes. They also requested that AGLC email the exhibits when ready for review, and they will provide the marked-up text together with the exhibits (if necessary). Upon attempting to finalize the exhibits for EPD review, AGLC determined that an updated property description was needed; therefore, the updated exhibits will be submitted to EPD once a final copy is obtained.
- August 2020: AGLC received the updated property description for Parcel 0119D 068; therefore, the final exhibits for the UEC were submitted to EPD. Subsequently, EPD provided their final comments and approval on the UEC language, pending incorporation of their suggested changes. The final UEC has been prepared and was sent to AGLC management for signature and execution in Q4. The signed UEC was submitted to EPD for execution.
- October 2020: The required UEC notices and associated notifications of receipt were prepared and submitted to the adjacent property owners for review and comment.
- November 2020: EPD provided comments that the UEC notices needed to be sent to two additional property owners. The additional UEC notices were prepared and submitted to the corresponding owners.
- December 2020: The notifications of receipt for the additional UEC notices were sent to EPD for review. EPD subsequently approved the notifications and submitted the sign UEC to the Director for execution.
- March 2021: AGLC received the executed UEC.
- April 2021: AGLC submitted the executed UEC to Lowndes County Court for recording.
- May 2021: As per the Rules, a copy of the court-recorded, executed UEC and required UEC notices were submitted to the adjacent property owners and associated notifications of receipt were submitted to EPD upon receipt.
- July 2021: The delisting package was submitted to the EPD Director for signature.
- August 2021: EPD provided a letter on August 26th stating that they concur with AGLC's certifications of compliance that the site is in compliance with non-residential RRS for soil and groundwater for tax parcel 0119D 068; residential RRS for soil and groundwater for tax parcel 0120C 202; and non-residential RRS for soil and residential RRS for groundwater for the former Valdosta Southern Railroad parcel. Further, EPD indicated that with the court-filing of the UEC for tax parcel 0119D 068, the requirements of Consent Orders EPD-HW-1009 and EPD-HW-1390 have been satisfied; therefore, the Orders have been terminated and the site has been delisted.

<u>Waycross</u>

- 2000: The EPD approved the CAP for the Waycross site.
- April 14, 2004: The EPD reclassified Waycross as a Class V site under HSRA.
- February 24, 2005: The EPD concurred with the amended CSR for the Waycross site, the supplemental Soil Closure Report, and the parcel certifications.
- August 2005: The EPD reclassified the Waycross Canal unit as Class III and removed the area from the HSI.

- October 2005: The EPD approved a limited feasibility analysis of the Waycross site and approved a pilot test for groundwater impacts. The EPD directed AGLC to determine the effectiveness of groundwater remedies at Waycross and to implement pilot treatment programs for groundwater.
- February 29, 2008: A pilot test completion report for Waycross was submitted.
- January 2010: The EPD requested that an evaluation of MNA be performed, and alternatives considered. Additional feasibility work was completed in 2010, with the submittal of an FFS that recommended pilot testing two methods to enhance MNA.
- Q3 2011: After meeting with the EPD, AGLC implemented the pilot tests.
- August 30, 2012: AGLC submitted a Pilot Test Report, which included detailed pilot testing results and a summary and implementation plan for full-scale remediation using *In Situ* Chemical Oxidation (ISCO) with Oxygen BioChem (OBC), one of the two remedial technologies that were tested.
- February 2013 – June 2013: Additional pilot testing and monitoring was completed.
- November 2013: The results were evaluated and presented in the November 2013 Semiannual Monitoring Report. It was determined that neither method was effective. The report recommended a limited investigation to determine if any additional residual MGP impacts are present to be addressed.
- May 20, 2015: The EPD provided comments on the 2013 and 2014 semiannual groundwater monitoring reports and requested that the proposed limited site investigation be implemented.
- July 14, 2015: AGLC submitted a response to comments to the EPD, including a request to meet with the EPD to discuss site status and options. AGLC met with the EPD in October 2015, where it was agreed that a limited site investigation was not warranted.
- May 27, 2016: EPD provided comments on the May 31, 2015 Semiannual Groundwater Monitoring Report, July 14, 2015 Response to EPD Comments dated May 29, 2015, November 30, 2015 Semiannual Groundwater Monitoring Report, and the December 23, 2015 Response to EPD Comments dated May 29, 2015 Addendum. The comments were addressed, and revised documents were submitted (as required) in the November 2016 Semiannual Groundwater Monitoring Report. Additionally, EPD concurred MNA will continue as the preferred groundwater remediation method.
- April 2018: EPD provided comments in a letter dated April 6, 2018 on the *Semiannual Groundwater Monitoring Report: September 2017 Groundwater Monitoring Event* dated November 2017. The comments included requests to check for errors and omissions and resolve these discrepancies in future monitoring reports and to ensure that the field forms are legible. ERM prepared a response that was submitted with the next report (in May 2018).
- November 2018: A request to reduce the monitoring well network and groundwater sampling frequency from semiannual to annual was included in the November 2018 groundwater monitoring report and reiterated in the May 2019 report to EPD.
- September 2019: In an email on September 3, 2019, EPD provided an interim approval of the monitoring well network reduction and the well abandonment request. The reduced monitoring well network was implemented during the September 2019 sampling event. The request to reduce the sampling to annual was not approved in this correspondence, but approval was provided in a subsequent letter (see below).
- April 2020: The EPD provided their agreement to AGLC's request to reduce the frequency of groundwater sampling and reporting from semiannual to annual with sampling in March and reports being due by May 31 of each year. It also reiterated EPD's approval to reduce the monitoring well network and abandon the wells no longer needed.
- May 2022: On May 12th the EPD provided comments on the *Groundwater Monitoring Reports: March 2020 and March 2021*, which stated that MNA is progressing in a satisfactory fashion, provided feedback on the discussion of groundwater trends in the 2021 Report, and that they find the well abandonment procedures described in the Monitoring Well Abandonment Report, dated

May 31, 2020 to be satisfactory. Accordingly, EPD will not require further action related to those well abandonments.

- May 2022: The results of the March 2022 monitoring event showed that groundwater in all of the remaining site monitoring wells are in compliance with the RRS; therefore, AGLC requested site closure and delisting. This request was included in the cover letter of the Annual Groundwater Monitoring Report submitted on May 31, 2022.
- September 2022: In an email dated September 15th, EPD requested a copy of the previous site RRS compliance certifications and accompanying EPD approvals for the site. AGLC responded in emails dated September 22 and 28th with all available soil certification documentation and approvals thereof.
- May 2023: The 2023 Annual Groundwater Monitoring Report was submitted, which included a second request for site closure and delisting.

Florida Program

AGLC has been involved in the investigation and remediation of three sites in Florida since approximately 1990. The United States Environmental Protection Agency (USEPA) is the lead agency for all three sites, with input from Florida Department of Environmental Protection (FDEP). The sites are legacy sites resulting from the acquisition of legacy companies, and all are shared with other Potentially Responsible Parties.

Since 2000, AGLC has performed a Site-wide Remedial Investigation, subdivision of the Orlando site into two Operable Units, and remedy selection and remedy construction for Operable Unit 1, soils, and groundwater to a depth of 60 feet below ground surface at the Orlando Former Gasification site. AGLC has conducted remedial actions involving the excavation and *in-situ* solidification (ISS) of over 100,000 cubic yards of soil and sediment at the Sanford Former MGP site; groundwater monitoring is ongoing. Two phases of soil and sediment excavation of over 100,000 cubic yards has been performed at St Augustine, which is now in a long-term groundwater monitoring program. Construction completion certificates have been obtained for the St. Augustine and Sanford sites for soil and sediments, though small amounts of residual MGP residuals remain in inaccessible areas.

<u>Orlando</u>

- June 12, 2003: The USEPA issued a draft Administrative Order on Consent (AOC) for a remedial investigation/feasibility study (RI/FS), a draft Scope of Work, and a Special Notice Letter to Potentially Responsible Parties (PRPs).
- August 8, 2003: The PRP Group, including AGLC, responded in the affirmative to the USEPA regarding the Special Notice Letter.
- September 30, 2003: The original members of the PRP Group and USEPA executed the AOC.
- January 26, 2004: The USEPA approved the Group's RI/FS work plan. The surficial groundwater and soils of the Orlando site moved through the investigative stage and into the remedy selection phase.
- March 15, 2004: The formal RI/FS phase was initiated.
- November 9, 2005: The USEPA approved the Phase II RI Work Plan and the Quality Assurance Project Plan (QAPP).
- January 2006: Phase II of the RI was implemented.
- January 2009: The RI Report was submitted to the USEPA and Florida Department of Environmental Protection (FDEP).
- March 2011: The Human Health and Ecological Risk Assessment (HHERA) was submitted to the USEPA and FDEP.
- November 14, 2011: It was decided that the Group would evaluate the data gaps needed to develop "cut lines" for the 50-foot treatment zone in Operable Unit 1 (OU1).
- December 2011: The USEPA issued a letter stating that they agree with the conclusions of the HHERA and had no further comments.
- April 6, 2012: The USEPA approved a work plan designed to collect sufficient data to establish cut lines for the extraction and containment portions of the Operable Unit 2 (OU2) site remedy. The scope was then expanded based upon the results of initial field data. The USEPA informally reviewed the data and agreed that it was sufficient to proceed with the FS.
- July 15, 2012: The Group submitted a work plan to the USEPA and FDEP to refine the understanding of the non-aqueous phase liquid (NAPL) distribution and hydraulic characteristics of the top 60 feet of the Upper Floridan Aquifer near the source area.
- October 5, 2012: The Group provided responses to the USEPA comments (dated August 29, 2012) on the work plan to refine the understanding of the NAPL distribution and hydraulic characteristics

of the top 60 feet of the Upper Floridan Aquifer near the source area, and then agreed to a series of further clarifications prior to its approval by the USEPA.

- November 2012: The OU2 work plan to evaluate potential groundwater and/or soil impacts deeper than 250 feet bgs was approved.
- December 18, 2012: A draft FS for OU1 was submitted to the USEPA.
- January 23, 2013: The USEPA provided comments on the draft FS for OU1 to the Group.
- February 28, 2013: A final FS for OU1 and responses to comments were submitted to the USEPA.
- June 30, 2013: The USEPA issued a Proposed Plan.
- July 8, 2013: The USEPA facilitated a public meeting to solicit public input. The Group provided a series of comments to the USEPA regarding the Proposed Plan for OU1 that included a revised description of Alternative 8 to make it align more clearly with the description provided in the FS.
- September 27, 2013: The USEPA issued their Record of Decision (ROD).
- December 2013: The Group submitted their Good Faith offer to implement the ROD. The Selected Remedy was essentially Alternative 8 of the FS. It required the installation of a containment wall and an engineered cap to encapsulate the source area, removal of impacted surficial soils and pavement, plus a combination of biosparging and/or MNA to address impacted groundwater outside of the source area. The Group would also be required to install additional borings beneath the building on Parcel 3 and remove or treat highly impacted soils from beneath that building, as well as the NAPL-saturated soils previously identified on Parcel 2.
- March 2014: The Group submitted technical memoranda describing a compound specific isotope analysis (CSIA) study and aquifer pump test studies performed in the Upper Floridan Aquifer in 2013 and a work plan describing the second phase of investigation of the 250 to 400-foot zone of the Upper Floridan Aquifer.
- April 2014: The USEPA approved the work plan for the second phase of investigation of the 250 to 400-foot zone of the Upper Floridan Aquifer.
- September 2014: A report describing the Phase II Historical Well Investigation was submitted to the USEPA. In addition, the Alternatives Screening Process Technical Memorandum – Operable Unit 2 was submitted to the USEPA to facilitate discussions regarding remedy selection and the scope of the FS for OU2.
- March 18, 2015: The Consent Decree (CD) for OU2 was entered by the court and became effective.
- March 27, 2015: The Group submitted a letter to the USEPA summarizing the remedial alternatives to be presented in the OU2 FS.
- June 8, 2015: The participating members of the OU1 Group submitted a draft Remedial Design Work Plan (RDWP) for OU1 to the USEPA and FDEP. The USEPA provided preliminary comments on June 25, 2015, which were discussed on August 21, 2015. A revised RDWP was submitted on August 21, 2015.
- September 4, 2015: The Group submitted the Treatability Study Work Plan to the USEPA.
- September 21, 2015: The Group submitted the Field Sampling and Analysis Plan (FSAP) and the QAPP to the USEPA.
- October 5, 2015: The USEPA approved the RDWP for OU1.
- May 9, 2016: The USEPA stated that they had no further comments on the FSAP for OU1, the Pre-Construction Groundwater Monitoring Plan for OU1, or the QAPP for the OU1 pre-investigation sampling.
- July 28, 2016: All parties agreed that it was appropriate to perform a multi-year pilot study in OU2 prior to completing the FS.
- October 19, 2016: The Group submitted a draft technical memorandum describing the conceptual design for a groundwater extraction pilot study in OU2. The USEPA and FDEP provided general

comments during a meeting on November 2, 2016, which will be incorporated into a draft pilot study work plan.

- October 16, 2016: ARCADIS submitted a groundwater monitoring work plan for the 2016 sampling event in OU2. It was approved, following revisions, in November 2016.
- March 31, 2017: Geosyntec submitted the Preliminary Design for review by USEPA and FDEP. The Group and USEPA have subsequently agreed that OU1 construction will occur in two phases, the first of which will be limited to surficial excavation on Parcels 4, 5, and part of 6. Comments from the Agency are being incorporated into the Final Design for Phase 1of the OU1 Final Design.
- June 22, 2017: The Group submitted a draft Pilot Study Work Plan for OU2 to USEPA and FDEP. The Group has subsequently hired Geosyntec to address these comments in a revised Pilot Study Work Plan, to be submitted in April 2018.
- March 1, 2018: An EPA Public Availability Session Community meeting held in as part of kick-off to Phase 1 OU1 excavation activities.
- March 11, 2018: The Group submitted the final OU1, Final Surface Soil Removal Work Plan for Parcels, 4, 5, and 6 for EPA. Field work began in mid-May 2018.
- March 26, 2018: Submitted Air Sparging/Soil Vapor Extraction (AS/SVE) Pilot Test Work Plan to USEPA and FDEP on March 26, 2018.
- May 11, 2018: The Group submitted a Health and Safety Plan to EPA for Phase 1 of the soil excavation associated with the OU1 remedy.
- May 17, 2018: The Group submitted the Orlando MGP Sparge/SVE Testing Results Summary and associated recommendation for the design to the EPA. EPA provided comments on May 28th; the Group responded, and EPA approved the design recommendations on May 30, 2018.
- May 23, 2018: The Group submitted the OU2 Pilot Study Work Plan to EPA and FDEP. Preliminary comments from the EPA's Scientific Support Section and limited comments by FDEP were received in August. Additional comments from USEPA are expected and implementation of the work is on hold until they are received.
- May 31, 2018: The Group submitted an OU1 Technical Memorandum – Groundwater Flow Modeling for Extraction/Injection Well Design to EPA and FDEP.
- July 27, 2018: Work Plans/documents submitted to USEPA and FDEP pending review and approval include: 1) Remedial Action Work Plan; 2) Construction Quality Control Plan; and 3) Construction Quality Assurance Plan.
- August 9, 2018: Draft short-term groundwater monitoring plan included proposed sampling locations and a rationale table were provided to USEPA and FDEP for review prior to preparation of the final Short-Term Groundwater Monitoring Plan.
- September 2018: The Group submitted the 90% design for Phase 2 and 3 of the OU1 remedy (barrier wall installation, LNAPL area solidification, includes Groundwater Remedial Design). The Group held a meeting to review the design documents with EPA and FDEP and EPA, FDEP provided comments in August, the Group responded, and revised the final design documents and resubmitted for approval to EPA and FDEP. The design was approved by EPA on September 25, 2018.
- February 6, 2019: Construction Completion Report for OU1 surface soils removal was submitted to EPA and the work was inspected and approved verbally by EPA on March 6, 2019.
- March 6, 2019: EPA approved the OU1 Phase 2: 1) Remedial Action Work Plan including the Phase 3 AS/SVE design and groundwater treatment system; 2) Construction Quality Control Plan; and 3) Construction Quality Assurance Plan with minor comments to be resolved with submission of the final documents.
- March 6, 2019: EPA tentatively approved the OU2 Pilot Study Work Plan (PSWP) pending resolution of minor comments with submission of the final document anticipated early in the second quarter. Work is planned after Phase 2 and 3 of OU1 is complete.

- April 15, 2019: The Remediation Contractor mobilized to complete OU1 Phase 2 (barrier wall, LNAPL ISS and shallow excavation work, and Phase 3 work for the AS/SVE shallow aquifer hydraulic control system).
- June 2019: The final OU2 Pilot Study Work Plan was revised and submitted to EPA.
- August 2019: The OU2 Pilot Study Work Plan was approved by the EPA with the changes made in June.
- February 2020: The Draft OU1 Short Term Groundwater Monitoring Plan (STGWMP) was submitted to EPA.
- March 2020: EPA provided minor comments on the OU1 STGWMP; comments will be resolved with submission of the final documents.
- April 2020: The Final OU1 STGWMP was submitted to EPA, which incorporated EPA's comments received on March 3, 2020. The report was subsequently approved by EPA.
- June 2020: EPA performed a pre-final inspection for OU1 remediation work.
- August 2020: Geosyntec submitted the Remediation Completion Report to EPA for review. EPA has not provided comments or approval to date.
- December 2020: In September, the EPA accepted the Final Construction Report as the final document as submitted and provided written approval.
- January 2021: The Final Construction Report was submitted with no changes to the report but with the addition of the final as-builts and copies of all closed-out permits.
- March 2021: The site-wide O&M Plan was prepared and was submitted to USEPA and FDEP.
- March 2021: A teleconference call/presentation was held with USEPA and FDEP. The teleconference was held to present a summary discussion of the data acquired associated with the performance of Phase 1 PSWP implementation related drilling activities beginning in May 2020 through the completion of aquifer performance testing in November 2020.
- April 2021: The Group provided a letter the USEPA and FDEP that proposed a revised path forward approach for the next step of Phase 2 PSWP implementation activities. Upon USEPA approval, upcoming PSWP implementation activities will include (i) a multi-well, multi-cycle, push-pull flushing study, (ii) microbial study, (iii) monitoring well drilling and installation, and (iv) groundwater modeling. USEPA generally agreed with the revised approach, made a few recommendations, and requested an implementation schedule.
- April 2021: The first OU1 Semi-Annual Performance Monitoring Report (Months 1-6 Monitoring Period) was submitted to USEPA and FDEP.
- May 2021: The O&M Plan was resubmitted to the USEPA and FDEP with USEPA comments addressed and a response to comments letter.
- May 2021: A draft Site Environmental Management Plan (SEMP) for Parcel 7 (right-of-way areas) was submitted to USEPA and FDEP for review.
- May 2021: On behalf of the Group, Geosyntec provided general timeframes for implementation of Phase 2 PSWP activities to USEPA via email.
- June 2021: FDEP provided comments on the draft SEMP for Parcel 7.
- August 2021: The Group submitted the final SEMP for Parcel 7.
- October 2021: Geosyntec and the Group finalized the Phase 2 PSWP and submitted to USEPA for review and approval on October 19th.
- October 2021: The second OU1 Semi-Annual Performance Monitoring Report (Months 7-12 Monitoring Period) was submitted to USEPA and FDEP. This report included proposed groundwater performance monitoring sampling program changes that were initiated in April 2022 after EPA approval.
- November 2021: The draft SEMP for Parcels 4 and 5 were submitted to USEPA and FDEP.
- January 2022: USEPA indicated agreement with the Phase 2 Pilot Study Work Plan (PSWP) on January 27th.

- January 2022: The final SEMP for Parcels 1, 3, 4, 5, and 7 (City Streets and Right-of-Way areas) were submitted to USEPA and FDEP.
- February 2022: The final SEMP for Parcels 2 and 6 were submitted to USEPA and FDEP.
- April 2022: The third OU1 Semi-Annual Performance Monitoring Report (Year 2 Month 1-6 Reporting Period) was submitted to USEPA and FDEP on April 28th.
- May 2022: FDEP provided approval on May 18th of the Site Environmental Management Plans (SEMPs) for Parcels 1 – 7 submitted to USEPA and FDEP in February 2022.
- May 2022: The Group submitted a summary report that presents key finding of the microbial study to USEPA and FDEP. The summary report included technical input and interpretation of microbial, chemical, and geochemical data by John Wilson (Scissortail Environmental, formerly with USEPA, Ada, Oklahoma).
- August 2022: Geosyntec presented initial summary of baseline testing and recommendations for further multicycle push-pull testing in a teleconference with USEPA, FDEP and Group members on August 25th.
- March 2023: A representative of Geosyntec and AGLC met with USEPA and FDEP on general, high-level OU1 and OU2 topics such as transitioning OU1 from active operations to long-term monitoring, OU2 Feasibility Study path forward, applicability of FL Chapter 62-780, etc.
- May 2023: On May 1st, the Group, Geosyntec, USEPA, and FDEP participated in a teleconference call to update USEPA and FDEP on the progress of groundwater flow modeling activities and the current evaluation of the multi-cycle push-pull testing data.
- August 2023: On August 3rd and August 23rd, the Group, Geosyntec, USEPA, and FDEP participated in a teleconference call to update USEPA and FDEP to present the revised groundwater flow model for OU2 and to discuss various FS-related topics.
- October 2023: The Group submitted the *Push-Pull Flushing Study Report* to USEPA and FDEP on October 13th. This report provides the data and results for work conducted during 2022-2023 in accordance with Section 3 of the *OU2 Phase 2 Pilot Study Work Plan* (dated 19 October 2021).
- December 2023: The Group submitted the *OU1 Semi-Annual Report for Year 3 Months 7 through 12* to USEPA and FDEP on December 15th.
- December 2023: The Group and Geosyntec submitted a technical memo (2023 Groundwater Flow Model Enhancements and Calibration) describing a UFA steady-state groundwater flow model for the site to USEPA and FDEP on December 15th.

<u>St. Augustine</u>

- March 26, 2001: The USEPA executed the AOC completing the approval of the St. Augustine site remediation plan. The USEPA issued a letter approving the St. Augustine Final Removal Action Report, which is equivalent to a Georgia Closure Report.
- April 13, 2004: The USEPA approved the Certification Statement and related documents.
- April 19, 2005: Based on the harbor development plan, the USEPA approved a Marina Basin Work Plan for the management of impacted sediments.
- June 30, 2005: Developers of the St. Augustine site received a USACE permit governing the work requirements. The USEPA also approved the Health and Safety Plan (HASP) and Hurricane Contingency Plan for the environmental work occurring during marina development.
- June 2007: Removal of sediment in the harbor and San Sebastian River was completed.
- February 2008: A Closure Report documenting compliance with the requirements of the Marina Basin Work Plan was submitted to the USEPA.
- April 2008: The St. Augustine Closure Report for the sediment removal within the marina basin area was approved by the USEPA. These approvals assured that AGLC had met all requirements of the AOC and that no further action was required except to continue action requirements for groundwater.

- September 2009: Groundwater monitoring at the site resumed, following a period of inactivity due to stalled development plans.
- May 2011: The USEPA approved the groundwater monitoring plan. The plan included semiannual sampling in June and December.
- June 2011: Installation of monitoring wells and resumption of routine on-site and off-site groundwater monitoring was conducted.
- June 19, 2012: AGLC and the City of St. Augustine submitted a work plan to the USEPA describing a tidal influence survey, a Geoprobe® groundwater survey to evaluate a potential source of off-site groundwater impacts, and the installation of two temporary shallow groundwater monitoring wells. This plan was verbally accepted.
- February 14, 2014: AGLC submitted an amendment to the Groundwater Monitoring Work Plan to the USEPA and FDEP to field test the cost-benefit of injecting an oxygen source into an area of impacted groundwater.
- August 2014: The USEPA agreed to allow AGLC to proceed with the sampling and testing but did not commit to whether they would accept the data interpretation that was described in the work plan.
- November 7, 2014: Results of a biological oxygen demand study was submitted to the USEPA via a letter report. The USEPA acknowledged receipt of the report summarizing the 30-day respirometer.
- April 10, 2015: AGLC submitted the Annual Groundwater Monitoring Report: December 2014 Groundwater Sampling Event and 5-Year Review to the USEPA and FDEP.
- September 21, 2015: The USEPA asked AGLC to return to semiannual groundwater monitoring for acenaphthene and re-evaluate possible enhancements in 2 to 3 years, requesting a work plan or a response in 30 days.
- October 21, 2015: The USEPA agreed that AGLC would perform a third-party review of potential groundwater remediation enhancement options for shallow groundwater rather than return to semiannual groundwater monitoring. This review was submitted in April 2016.
- September 2018: A letter request to abandon MW-6D and remove certain property restrictions (eliminate the easement agreement) on the Solla Caraba Property (located north of the site) to facilitate the sale and redevelopment of that property was prepared and submitted to EPA for approval in August 2018. EPA provided written approval for abandonment of MW-6D in September.
- October 2018: Approval for the request to remove the property easement was received from the EPA.
- April 2019: The Annual Groundwater Report that summarized the December 2018 groundwater monitoring activities was submitted to EPA. The report included details on well abandonment and repairs.
- December 2019: The new developer has requested information on the groundwater system and if and/or when we plan to abandon any on-site wells in order to facilitate site development.
- April 2020: After review of the recent and historical groundwater data, AGLC and the City of St. Augustine concluded that permanent abandonment of the deep surficial groundwater monitoring wells is warranted, based on the absence of COIs detected above the Groundwater Clean-up Target Levels (GCTLs) in the deep surficial aquifer monitoring wells in December 2019, historical groundwater data on site, and the presence of recorded institutional controls on the marina parcel. Since redevelopment of the marina property parcel is now proceeding through the local planning approval process and construction is expected to begin following planning approval and issuance of necessary permits, AGLC and the City included a request for permanent abandonment of the deep wells on the marina property in the Annual Groundwater Monitoring Report. In this report, AGLC and the City recommended that EPA authorize the termination of further groundwater sampling

from, and the permanent abandonment of, deep surficial aquifer monitoring wells MW-31D, MW-32D, and MW-33D on the marina property.

- October 2020: EPA approved AGLC's request to abandon three deep surficial aquifer monitoring wells (MW-31D, MW-32D, and MW-33D), which were subsequently abandoned in December.
- March 2021: Due to the lack of detections for over 10 years, AGLC included a request to abandon the remaining deep surficial monitoring wells (MW-19D, MW-26D, and MW-34D) in the Annual Groundwater Monitoring Report.
- In January 2022, AGLC was notified that the construction was expected to begin in early February 2022. Based on the construction design, this required the AGLC and the City of St. Augustine (the Group) to abandon one shallow groundwater monitoring well (MW-29S) located in the immediate area during installation of the new lift station. Due to the absence of benzene detected above the MCLs in MW-29S since 2013, and relatively stable concentrations of acenaphthene in the area over the past several years, the Group recommended that USEPA authorize the abandonment of this well (MW-29S) without no replacement well since the concentrations in MW-29S have been consistent with the concentrations in MW-05S and MW-10S for years and the concentrations in MW-05S have generally been the highest in this group of wells. Due to the limited timeframe to abandon MW-29S prior to the City initiating the lift station construction, a request to abandon MW-29S and a reiteration of the Group's request to abandon MW-29D, MW-26D, and MW-34D was submitted to the USEPA on January 31st.
- February 2022: AGLC participated in a conference call with Mr. Rusty Kestle of USEPA on Wednesday, February 2nd regarding the request to abandon MW-29S, MW-19D, MW-26D, and MW-34D. Mr. Kestle verbally approved the request during the telephone conference. As the method to abandon the remaining deep monitoring wells was not included in the *2021 Annual Groundwater Report*, Mr. Kestle requested a follow-up letter to include a request to abandon all of the wells (MW-29S, MW-19D, MW-26D, and MW-34D) discussed during the February 2nd call as well as the methods to abandon each well. The supplementary well abandonment request letter was submitted to USEPA on February 9, 2022. Potential abandonment of additional, unnecessary wells was also discussed during the call between AGLC and EPA; therefore, the Group included shallow monitoring wells MW-21S, MW-22S, and MW-23S in the request for abandonment because their groundwater concentrations had been below the detection limits for at least 10 years or are currently only used for gauging water levels.
- February 2022: The request to abandon select wells (MW-29S, MW-19D, MW-26D, MW-34D, MW-21S, MW-22S, and MW-23S) was approved by USEPA (Mr. Kestle) in an email dated February 11th.
- July 2022: The Well Abandonment Report was submitted to USEPA and FDEP on July 22nd.

<u>Sanford</u>

- July 5, 2000: The USEPA issued a ROD for Sanford OU1 (soils).
- June 12, 2001: The USEPA issued a ROD for Sanford OU2 (groundwater).
- December 18, 2002: The Group submitted the revised Design Sampling and Analysis Report, which demonstrated that the volume of impacted soils was much greater than had been thought, based upon previous work.
- September 21, 2006: The USEPA issued a ROD for Sanford Operable Unit 3 (OU3) (sediments).
- September 30, 2006: The USEPA issued an Amended ROD for the Sanford OU1 and OU2 (soil and sediment) remediation. Finalizing the Amended ROD was delayed due to a difference of interpretation between the USEPA and FDEP regarding FDEP's standards for soil cleanup and the effect of those standards on the USEPA's cleanup requirements.
- June 5, 2007: The USEPA and Sanford PRP Group (Group) negotiated and executed a CD that encompasses the existing approved RODs. Following execution of the CD by the Group, the USEPA required several changes.

- September 27, 2007: After negotiation of changes and receipt of additional USEPA assurances, the Group approved changes to the CD.
- July 2009: The USEPA approved the Pilot Test Work Plan and the Pilot Test Air Sampling and Monitoring Program.
- September 2009: The USEPA approved the changes to the OU1 Amended ROD and OU3 ROD as a memorandum to the file and approved the Final Design in documents dated September 24, 2009.
- October 6, 2009: The U.S. Army Corps of Engineers (USACE) waived Jurisdiction for Dredging and Filling. Additionally, the Group received approval for a Florida State Environmental Resource Permit.
- January 2012: The draft Final Construction/Documentation Report and most of the associated appendices were submitted to the USEPA.
- April 2012: The Air Monitoring Report and operations and maintenance (O&M) plan were submitted.
- June 2012: The USEPA notified the Group, verbally, that the Air Monitoring Report and O&M plan documents were acceptable, as submitted.
- August 15, 2012: Formal approval of the documents was received from the USEPA.
- August 31, 2012: A draft Remedial Action Report for OU1 and OU3 was submitted.
- September 18, 2012: The USEPA provided comments on the draft Remedial Action Report. A revised Remedial Action Report for OU1 and OU3 was then submitted.
- September 28, 2012: The revised Remedial Action Report for OU1 and OU3 was approved.
- January 9, 2013: The Groundwater Monitoring Plan – rev 1 and associated QAPP were approved by the USEPA.
- February 8, 2013: The USEPA verbally approved the Final Construction/ Documentation Report.
- July 2013: The USEPA and FDEP approved the Group's request to replace two poorly producing monitoring wells, MW-106S and MW-106D, with a single well, MW-106R.
- August 1, 2013: The USEPA approved the well replacement in an email to Jessica Bednarcik.
- February 2014: The FDEP approved deed restriction language for the SanGroup property. Similar language, however, would not be incorporated into deed restrictions for other properties. The USEPA and FDEP also approved several proposed changes to the groundwater monitoring program. The USEPA and FDEP approved a request to reduce the frequency of groundwater monitoring from biannual to annual and agreed to reduce the number of wells to be monitored in 2014.
- March 2015: The USEPA finalized their five-year review and issued a Preliminary Close-out Report. The USEPA approved a reduction of AGLC's financial assurance requirements for the Sanford site from $12.9 million to $1.1 million, based upon work that had been successfully completed.
- The USEPA requested that the Group submit a Remedial Action Completion Report for OU2 (Groundwater) in 2016, even though monitoring will continue for many years.
- March 31, 2016: The Group submitted a work plan to investigate groundwater exceedances observed at well MW-106R.
- August 9, 2016: The Group submitted the Remedial Action Report for OU2 to the USEPA. It was approved on August 16, 2016.
- December 21, 2016: The Group submitted a Five-Year Review and a 2016 Annual Groundwater Monitoring Report, which contained recommendations for decreased sampling in future years.
- The agency accepted a reduction in the analyte list and in the number of wells to be sampled.
- July 16, 2019: Duke participated in a 5-year review scoping call with members of USEPA and their contractor. EPA schedules the on-site 5-Year review for August 13, 2019.
- August 2019: The Group participated in the 5-Year review and site walk with EPA.

- September 2019: The EPD prepared a draft Five-Year Review, which the Group reviewed and commented on. EPA prepared the final Five-Year Review.
- December 2019: The Annual Groundwater Monitoring Report was submitted for EPA review.
- December 2020: The Annual Groundwater Monitoring Report was submitted for EPA review.
- June 2021: Groundwater Use Advisory Zone (GUAZ) notifications (Notices) were prepared and sent to USEPA for approval, which were subsequently approved.
- September 2021: USEPA requested an "80 percent draft" of an updated Quality Assurance Project Plan (QAPP), which has not been updated since 2011, by mid-October.
- September 2021: During a site visit, Silar Services, Inc.'s subcontractor identified some ground disturbances (fence post installation and tire ruts) on the Codisco property along 3rd Street between Cloud Branch Creek and Cedar Avenue. Photos and a description of the site disturbance were sent to USEPA on September 30th. Discussions regarding the site disturbances continued into October until USEPA decided to send a Notice of Violation to the property owner to avoid any future issues.
- October 2021: The updated QAPP was submitted to USEPA.
- December 2021: As indicated on a call with USEPA/FDEP, EPA is satisfied that the Group has met requirements of the 2021 GUAZ notifications.
- December 2021: The Annual Groundwater Monitoring Report was submitted for EPA review.
- March 2022: The 2022 GUAZ Letter was sent to USEPA for approval.
- April 2022: Codisco's engineer prepared and submitted a Corrective Action Plan Completion Report completion report to FDEP for the NOV noted in September 2021.
- April 2022: In a letter dated April 8th, FDEP indicated that they find the report acceptable and consider the matter of the violation of the Declaration of Restrictive Covenant closed.
- August 2022: Groundwater Use Advisory Zone (GUAZ) Notifications were successfully sent via certified mail to all recipients except the Christian Deliverable Outreach Ministry. The GUAZ notification was hand delivered to the church on August 23rd.
- November 2022: USEPA accepted the QAPP as final.
- November 2022: The recommendation to return to annual monitoring was made to USEPA and FDEP on the November 16th call; they did not disagree with the recommendation.
- December 2022: The Annual Groundwater Monitoring Report was submitted for EPA review.
- December 2023: The Annual Groundwater Monitoring Report was submitted to USEPA and FDEP.

MGP Acronyms

ACMR	Annual Compliance Monitoring Report
ADGISSM	area downgradient of the ISS mass
AECOM	AECOM, Inc
AES	Analytical Environmental Services
AGLC	Atlanta Gas Light Company
BDWP	Basis of Design Work Plan
bgs	below ground surface
BIPS	Borehole Image Processing System
BPLM	by-product like material
bss	below sediment surface
BTEX	benzene, toluene, ethylbenzene, and xylenes
BTU	British thermal unit
CADD	Computer-Aided Drafting and Design
CAP	Corrective Action Plan
CD	Consent Decree
CCI	Christian, Carmichael, Inc.
CCP	Central City Park
CERCLIS	Comprehensive Environmental Responsibility, Compensation, and Liability Information System
CLP	Contract Laboratory Program
COC	chain-of-custody
COI	constituent of interest
CPAH	carcinogenic polynuclear aromatic hydrocarbon
CRQL	Contract Required Quantitation Limit
CSI	Compliance Status Investigation
CSR	Compliance Status Report
DMS	Document Management System
DNAPL	dense non-aqueous phase liquid
DO	dissolved oxygen
DPT	direct-push technology
EA	Environmental Assessment
EAC	Estimate at Completion
ECM	Environmental Cost Management, Inc
EISOPQAM	Environmental Investigation Standard Operating Procedures and Quality Assurance Manual
EPD	Environmental Protection Division
ERIIS	Environmental Risk Information and Imaging Services
ERM	Environmental Resource Management, Inc
ERP	Environmental Resource Permit
ETC	Estimate to Complete
EVA	Earned Value Analysis
FDEP	Florida Department of Environmental Protection
FFS	Focused Feasibility Study
FID	flame ionization detector
ft	feet or foot
ft3	cubic feet
ft/day	feet per day
ft/ft	foot per foot
ft/min	feet per minutes
ft/yr	feet per year

FS	Feasibility Study
FY	fiscal year
GAC	granular activated carbon
G/L	general ledger
G&M	Geraghty & Miller, Inc.
GPC	Georgia Power Company
GW CAP-A	Groundwater Corrective Action Plan Addendum
GWM	groundwater model
HSA	hollow-stem auger
HSRA	Hazardous Site Response Act
in	inch
ISCO	in situ chemical oxidation
ISCO	in situ oxidation curtain
ISS	in situ solidification
ISWQC	In-Stream Water Quality Criteria
IT	Information Technology
kg	kilogram
LAW	LAW Engineering Services
LNAPL	light nonaqueous phase liquid
LUST	leaking under storage tank
MACTEC	MACTEC Engineering and Consulting, Inc
MEP	Monitoring Evaluation Plan
mg/kg	milligram per kilogram
mg/L	milligrams per liter
MGP	manufactured gas plant
MI&P	Macon Iron & Paper
MNA	Monitored Natural Attenuation
MSL	mean sea level
MSP	Microsoft Project
mV	millivolt
NAPL	nonaqueous phase liquid
NFRAP	No Further Remedial Action Planned
NOAA	National Oceanographic and Atmospheric Administration
NRT	Natural Resource Technology, Inc
NTU	nephelometric turbidity units
O.C.G.A.	Official Code of Georgia Annotated
OD	outside diameter
OLM	oil-like material
OLM	organic leaching model
OM&M	operation, maintenance, and monitoring
ORC	Oxygen Reduction Compound
ORP	oxidation-reduction potential
OU	Operable Unit
P&T	pump and treat
PA	preliminary assessment
PAH	polynuclear aromatic hydrocarbon
PARCC	precision, accuracy, representativeness, completeness, and comparability

PCE	perchloroethylene
PFT	preliminary fate-and transport
PID	photoionization detector
PM	project management
POTW	publicly owned treatment works PQL
	practical quantitation level
PSC	Public Service Commission
PT	pilot test
PTWP	pilot test work plan
PVC	polyvinyl chloride
QA/QC	quality assurance/quality control
QAPP	Quality Assurance Project Plan
RACR	Remedial Action Completion Report
RCRIS-LG	Resource Conservation and Recovery Information System – Large Quantity Generators
RETEC	The RETEC Group, Inc.
River CAP	Corrective Action Plan for Sediments in the Ocmulgee River
ROD	Record of Decision
RRS	risk reduction standard
SCI	source control investigation
SCM	Site Conceptual Model
SDG	sample delivery group
SDI	Source delineation investigation
SDIR	Source Delineation Investigation Report
SESOIL	Seasonal Soil Compartment Model
SI	Site Inspection
SPLP	synthetic precipitation leaching procedure
SSC	Supplemental Site Characterization
SVOC	semivolatile organic compound
TCLP	Toxicity Characteristics Leaching Procedure
TLM	tar-like material
TOC	total organic carbon
TSA	treatability study assessment
UBL	upper background limit
µg/L	microgram per liter
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
UST	underground storage tank
UUL	upper upgradient limit
Validata	Validata Chemical Services
VOC	volatile organic compound
VRP	Voluntary Remediation Program
WILLIAMS	Williams Environment Services, Inc.
WRS	WRS-Compass

ENVIRONMENTAL RESPONSE CLEAN-UP CHARGES
QUARTER ENDING December 31, 2023

Name / Location	PROGRAM MANAGEMENT EXPENSE 18230928	CONTRACTOR EXPENSE 18230929	CONSULTANT EXPENSE 18230930	LEGAL EXPENSE 18230931	TOTAL
Athens (ATHGA)					
Cumulative as of 06/30/24	283,353.47	5,890,286.41	418,018.33	1,399,332.95	7,990,991.16
Period Ending 9/30/23	0.00	0.00	0.00	2,410.50	2,410.50
Period Ending 12/31/23	0.00	0.00	0.00	985.00	985.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	283,353.47	5,890,286.41	418,018.33	1,402,728.45	7,994,386.66
Atlanta #1 (ATLG1)					
Cumulative as of 06/30/23	19,110.68	42,917.30	30,026.18	4,357.28	96,411.44
Period Ending 9/30/23	0.00	0.00	0.00	0.00	0.00
Period Ending 12/31/23	0.00	0.00	0.00	0.00	0.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	19,110.68	42,917.30	30,026.18	4,357.28	96,411.44
Atlanta #2 (ATLG2)					
Cumulative as of 06/30/23	202.52	0.00	20,119.74	810.42	21,132.68
Period Ending 9/30/23	0.00	0.00	0.00	0.00	0.00
Period Ending 12/31/23	0.00	0.00	0.00	0.00	0.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	202.52	0.00	20,119.74	810.42	21,132.68
Augusta (AUGGA)					
Cumulative as of 06/30/23	12,433,166.26	69,696,072.35	20,797,614.64	2,599,548.20	105,526,401.45
Period Ending 9/30/23	0.00	5,750.00	0.00	445.50	6,195.50
Period Ending 12/31/23	0.00	8,050.00	0.00	12,659.00	20,709.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	12,433,166.26	69,709,872.35	20,797,614.64	2,612,652.70	105,553,305.95
Brunswick (BRUGA)					
Cumulative as of 06/30/23	526,360.25	960,697.20	2,241,403.66	200,050.17	3,928,511.28
Period Ending 9/30/23	0.00	1,739.88	0.00	0.00	1,739.88
Period Ending 12/31/23	0.00	0.00	0.00	0.00	0.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	526,360.25	962,437.08	2,241,403.66	200,050.17	3,930,251.16
Griffin (GRIGA)					
Cumulative as of 06/30/23	947,139.21	4,796,919.88	2,079,434.50	203,067.68	8,026,561.27
Period Ending 9/30/23	0.00	0.00	0.00	0.00	0.00
Period Ending 12/31/23	0.00	1,112.50	0.00	445.50	1,558.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	947,139.21	4,798,032.38	2,079,434.50	203,513.18	8,028,119.27
Macon #1 (MACG1)					
Cumulative as of 06/30/23	2,223,177.04	14,864,319.89	5,108,219.47	2,928,705.09	25,124,421.49
Period Ending 9/30/23	0.00	(9,869.98)	0.00	445.50	(9,424.48)
Period Ending 12/31/23	0.00	6,916.00	0.00	1,495.00	8,411.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	2,223,177.04	14,861,365.91	5,108,219.47	2,930,645.59	25,123,408.01
Macon #2 (MACG2)					
Cumulative as of 06/30/23	44,963.24	3,021.20	156,370.97	279,525.83	483,881.24
Period Ending 9/30/23	0.00	0.00	0.00	0.00	0.00
Period Ending 12/31/23	0.00	0.00	0.00	0.00	0.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	44,963.24	3,021.20	156,370.97	279,525.83	483,881.24
Macon #3 (MACG3)					
Cumulative as of 06/30/23	96,669.29	7,595,900.61	1,135,861.23	234,099.86	9,062,530.99
Period Ending 9/30/23	0.00	0.00	0.00	0.00	0.00
Period Ending 12/31/23	0.00	0.00	0.00	0.00	0.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	96,669.29	7,595,900.61	1,135,861.23	234,099.86	9,062,530.99

ENVIRONMENTAL RESPONSE CLEAN-UP CHARGES
QUARTER ENDING December 31, 2023

Name / Location	PROGRAM MANAGEMENT EXPENSE 18230928	CONTRACTOR EXPENSE 18230929	CONSULTANT EXPENSE 18230930	LEGAL EXPENSE 18230931	TOTAL
Rome (ROMGA)					
Cumulative as of 06/30/23	(4,036.51)	5,633,904.70	2,707,037.86	3,319,191.11	11,656,097.16
Period Ending 9/30/23	0.00	659.96	0.00	0.00	659.96
Period Ending 12/31/23	0.00	1,870.50	0.00	346.50	2,217.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	(4,036.51)	5,636,435.16	2,707,037.86	3,319,537.61	11,658,974.12
Savannah (SAVGA)					
Cumulative as of 06/30/23	4,893,780.76	31,689,687.22	11,594,054.04	1,537,331.12	49,714,853.14
Period Ending 9/30/23	0.00	10,341.43	0.00	0.00	10,341.43
Period Ending 12/31/23	0.00	7,867.45	0.00	0.00	7,867.45
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	4,893,780.76	31,707,896.10	11,594,054.04	1,537,331.12	49,733,062.02
Valdosta (VALGA)					
Cumulative as of 06/30/23	1,160,740.60	11,360,953.94	5,200,304.16	582,778.99	18,304,777.69
Period Ending 9/30/23	0.00	0.00	0.00	0.00	0.00
Period Ending 12/31/23	0.00	0.00	0.00	0.00	0.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	1,160,740.60	11,360,953.94	5,200,304.16	582,778.99	18,304,777.69
Waycross (WAYGA)					
Cumulative as of 06/30/23	941,943.98	21,060,321.08	3,210,752.04	935,282.39	26,148,299.49
Period Ending 9/30/23	0.00	1,347.06	0.00	0.00	1,347.06
Period Ending 12/31/23	0.00	0.00	0.00	0.00	0.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	941,943.98	21,061,668.14	3,210,752.04	935,282.39	26,149,646.55
Sanford, FL (SANFL)					
Cumulative as of 06/30/23	1,534,664.62	10,882.87	665,151.19	9,033,461.82	11,244,160.50
Period Ending 9/30/23	4,673.50	0.00	0.00	489.50	5,163.00
Period Ending 12/31/23	2,357.25	0.00	0.00	311.50	2,668.75
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	1,541,695.37	10,882.87	665,151.19	9,034,262.82	11,251,992.25
St. Augustine, FL (STAGL)					
Cumulative as of 06/30/23	1,074,313.20	8,531,762.48	2,995,020.55	1,760,239.19	14,361,335.42
Period Ending 9/30/23	21,190.97	2,814.52	0.00	21,408.50	45,413.99
Period Ending 12/31/23	17,408.85	10,065.83	0.00	450.00	27,924.68
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	1,112,913.02	8,544,642.83	2,995,020.55	1,782,097.69	14,434,674.09
Orlando, FL (ORLGA)					
Cumulative as of 06/30/23	2,027,937.30	2,121,214.23	8,311,152.46	3,367,887.13	15,828,191.12
Period Ending 9/30/23	58,798.98	0.00	414,287.50	17,119.50	490,205.98
Period Ending 12/31/23	37,919.02	0.00	0.00	13,343.50	51,262.52
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	2,124,655.30	2,121,214.23	8,725,439.96	3,398,350.13	16,369,659.62
Total Site Recoverable Expenses					
Cumulative as of 06/30/23	28,203,485.92	184,258,861.36	66,670,541.03	28,385,669.23	307,518,557.53
Period Ending 9/30/23	84,663.45	12,782.87	414,287.50	42,319.00	554,052.82
Period Ending 12/31/23	57,685.12	35,882.28	0.00	30,036.00	123,603.40
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	28,345,834.49	184,307,526.51	67,084,828.53	28,458,024.23	308,196,213.75
General Technical - Environmental (AGLGN) non-site specific general program mgt					
Cumulative as of 06/30/23	18,845,252.32	7,849.73	1,704,592.48	313,325.37	20,871,019.90
Period Ending 9/30/23	110,509.53	5,026.00	0.00	0.00	115,535.53
Period Ending 12/31/23	106,798.45	516.00	0.00	0.00	107,314.45
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	19,062,560.30	13,391.73	1,704,592.48	313,325.37	21,093,869.88

ENVIRONMENTAL RESPONSE CLEAN-UP CHARGES
QUARTER ENDING December 31, 2023

Name / Location	PROGRAM MANAGEMENT EXPENSE 18230928	CONTRACTOR EXPENSE 18230929	CONSULTANT EXPENSE 18230930	LEGAL EXPENSE 18230931	TOTAL
Legal Expenses (historical non-site costs related to PRPs)					
Cumulative as of 06/30/23	1,420,846.91	0.00	512,102.96	21,843,388.58	23,776,338.45
Period Ending 9/30/23	0.00	0.00	0.00	0.00	0.00
Period Ending 12/31/23	0.00	0.00	0.00	0.00	0.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	1,420,846.91	0.00	512,102.96	21,843,388.58	23,776,338.45
Legal General Expenses (AGLLG) - Non Site Specific Legal Expense (previously 'accruals and other non-site expenses')					
Cumulative as of 06/30/23	147,572.48	7,976.55	0.00	23,403.89	178,952.92
Period Ending 9/30/23	0.00	0.00	0.00	816.00	816.00
Period Ending 12/31/23	0.00	0.00	0.00	564.00	564.00
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	147,572.48	7,976.55	0.00	24,783.89	180,332.92
Total Non-Site Recoverable Expenses					
Cumulative as of 06/30/23	20,412,086.50	15,826.28	2,216,695.44	22,180,117.84	44,824,726.06
Period Ending 9/30/23	110,509.53	5,026.00	0.00	816.00	116,351.53
Period Ending 12/31/23	106,798.45	516.00	0.00	564.00	107,878.45
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	20,629,394.48	21,368.28	2,216,695.44	22,181,497.84	45,048,956.04
Total All Recoverable Expenses					
Cumulative as of 06/30/23	48,615,572.42	184,274,687.64	68,887,236.47	50,565,787.07	352,343,283.59
Period Ending 9/30/23	195,172.98	17,808.87	414,287.50	43,135.00	670,404.35
Period Ending 12/31/23	164,483.57	36,398.28	0.00	30,600.00	231,481.85
Period Ending 3/31/24	0.00	0.00	0.00	0.00	0.00
Period Ending 6/30/24	0.00	0.00	0.00	0.00	0.00
Total	48,975,228.97	184,328,894.79	69,301,523.97	50,639,522.07	353,245,169.79

ATLANTA GAS LIGHT COMPANY
ENVIRONMENTAL RESPONSE COSTS
QUARTER ENDING December 31, 2023

Account Number	OLD Acct Number	Description	Quarter	Year-to-date
18230928	162610	Program Management Clean-up Expense	164,483.57	359,656.55
18230929	162611	Contractor Expense	36,398.28	54,207.15
18230930	162612	Consultant Expense	-	414,287.50
18230931	162614	Legal Litigation Expense	30,600.00	73,735.00
18230933	162616	Property Acquisition Settlement Expense	-	
		Total	**231,481.85**	**901,886.20**

Account Definitions

18230928	Site-specific and general expense for management, reporting, salaries, benefits, allocation of facilities & employee expenses.
18230929	Actual expenses from invoices of contractors, subcontractors, and consultants related to actual remediation of a MGP site.
18230930	All consultant fees and expenses related to investigation and design of corrective action plans, engineering, community relations, and regulatory negotiation.
18230931	Legal fees and disbursements associated with litigation avoidance, pre-litigation activity, actual litigation activity and other legal expense.
18230933	Expenses related to temporary or permanent acquisitions of property. Payments for loss during clean-up, payments for inconvenience, damage, settlements, etc.

Site Name	Previous Site Number	New Site Identifier
Athens	7851	ATHGA
Atlanta #1	7852	ATLG1
Atlanta #2	7853	ATLG2
Augusta	7854	AUGGA
Brunswick	7855	BRUGA
Griffin	7856	GRIGA
Macon #1	7857	MACG1
Macon #2	7858	MACG2
Macon #3	7863	MACG3
Rome	7859	ROMGA
Savannah	7860	SAVGA
Valdosta	7861	VALGA
Waycross	7862	WAYGA
Sanford, FL	7870	SANFL
St. Augustine, FL	7871	STAGL
Orlando, FL	7872	ORLFL
Legal General	7888*	AGLLG
General Technical	7850	AGLGN

*previously "accruals and other non-site expenses"

Atlanta Gas Light Company
Total Revenue Recovery through
Environmental Response Cost Recovery Rider

	Quarter Ending December 2021	Quarter Ending March 2022	Quarter Ending June 2022	Quarter Ending September 2022	Quarter Ending December 2022	Quarter Ending March 2023	Quarter Ending June 2023	Quarter Ending September 2023	Quarter Ending December 2023	Total to Date
Quarterly Cost Recovered	$ 1,578,729.43	$ 1,625,455.08	$ 1,604,392.61	$ 1,566,907.92	$ 1,586,996.14	$ 1,630,242.34	$ 1,607,888.06	$ 1,571,555.10	$ 1,526,112.29	$299,029,337.21
Average Cost Per Customer Per Month	$0.321	$0.325	$0.325	$0.542	$0.540	$0.535	$0.536	$0.534	$0.532	$0.532
								Total Revenue	Total Revenue	$299,029,337.21
Rider Expense Recovery								Total Customers Billed	otal Customers Billed	561,947,464
Third Party Recoveries										0.532
Recovery to Date						$27,339,449.18				
Amount applied to Rider						$13,669,724.59				
Total Expenses Incurred						$353,245,169.79				
less Third Party recovery						$13,669,724.59				
less Interest Accrued to Ratepayer Acct						$3,638,204.27				
less Deferred Tax Benefit						$28,129,097.98				
Net Recoverable Expenses						$307,808,142.95				
Recovery from Ratepayer						$299,029,337.21				
Net Outstanding to be recovered						$8,778,805.74				

Atlanta Gas Light Company
Total Carrying Cost incurred / Offset - *will not be recovered through rider*

	Quarter Ending December 2021	Quarter Ending March 2022	Quarter Ending June 2022	Quarter Ending September 2022	Quarter Ending December 2022	Quarter Ending March 2023	Quarter Ending June 2023	Quarter Ending September 2023	Quarter Ending December 2023	Total to Date
Quarterly Carrying Cost Incurred	$392,452.99	$363,437.06	$366,238.07	$369,123.98	$251,030.19	$228,762.20	$232,947.60	$244,280.00	$195,230.17	$117,569,587.75
Third Party Recoveries										
Recovery to Date						$27,339,449.18				
Amount applied to offset Carrying Cost						$13,669,724.59				
Total Carrying Cost incurred						$117,569,587.75				
less Third party recovery applied to offset carrying cost						$13,669,724.59				
Net Outstanding Carrying Cost						$103,899,863.16				