From:	Dawn Taylor
To:	Jan.Simmons@dnr.state.ga.us; Amy.Potter@dnr.state.ga.us
Cc:	Jennifer Wendel; Cathy Amoroso
Subject:	Need Gillem update
Date:	11/07/2012 11:13 AM
Importance:	High

Jan/Amy-
HQs (Reggie Cheatham) has a regular quarterly meeting with the Army tomorrow (Thurs 11/8) at 10 am and John Tesner has specifically asked that Gillem (among other potential NPL sites - Wallops, Stratford, etc.) be on the agenda. Reggie asked me to get a status update from you and also to put together some key issues that should be highlighted to Tesner at the meeting. Can you get me a status update? I took a stab at putting together the 4 main issues I have heard related to lack of progress at the site - are these accurate and are you ok with me providing this info to Reggie to discuss with Tesner tomorrow? Also,is there any update on if the Governor will support listing this site and are we still on track for potential listing in April 2013? I think a deadline of Dec 1 had been discussed regarding when the State would let EPA know if we should send the state concurrence request letter or not.
Thanks
Dawn

Items to highlight to Tesner tomorrow regarding Gillem:

#1. Off site ground water plumes discovered in the 1990s have not been contained, let alone remediated, and are still spreading. Off-site contamination is not being addressed, and there seems to be no plan in place to address it. The State has stressed to the Army the need to fully characterize the off-site ground water plume and potential vapor intrusion, but there has been no commitment by the Army to do this. The Army and the Local Redevelopment Authority (LRA) are planning to work out a deal in which they divide clean up responsibilities in some way, but that applies only to the facility property and does not apply to contamination beyond the facility boundary. Since there is no site management plan, schedule for cleanup, milestones, etc., in place, it is unclear what the LRA is agreeing to do and what the Army is agreeing to do with respect to investigation and clean up.

#2. There is no site management plan, no overarching schedule for investigation and clean up of the known "sites," no milestones, etc. Army BRAC office does not intend to add any new areas of concern to the program, even when specifically requested by State.

#3. The Army has made it's own "clean parcel determination" under CERCLA 120 h (1) ("CERFA") , without any regulatory concurrence (which isn't required since the site isn't on the NPL), encompassing 70% of the installation, most of which is based on absence of reported releases rather than affirmative information that the area is truly a clean parcel. The State's written comments regarding areas of concern within the "clean parcel" have been ignored. The State has asked for additional investigation in at least 4 of the areas designated for clean transfer, and there has been quite a bit of resistance to doing that (mostly the LRA saying "if we find something during redevelopment activities then we will address it, but if the Army says it is clean now that is good enough for us). **The property was scheduled for FOST (clean) transfer in October 2012 (774 of the 1,100 acres) - did this happen???**

#4. Army BRAC personnel - and the LRA - have an argumentative stance towards the State, and routine requests and comments made by the state are rebuffed or ignored.