

From: "Yomi" <yomi@eco-act.org>
To: <VOGTLE_EIS@nrc.gov>
Date: 11/28/2007 4:47:57 PM
Subject: Re: Environmental Community Action Inc. (ECO-Action) Comments on the Draft Environmental Impact Statement for the Plant Vogtle Early Site Permit

Find attached ECO-Action's comments and two attachments for your consideration.

Respectfully,

Yomi Noibi, Ph.D.
Executive Director
Environmental Community Action, Inc. (ECO-Action)
250 Georgia Avenue SE, Suite 309
Atlanta, GA 30312

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ECO-Action

Precaution is preventing harm when you cannot proof the

cause of harm

November 28, 2007

Chief, Rules and Directives Branch

Division of Administrative Services

Office of Administration

Mailstop T-6D59

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

E-mail: Vogtle_EIS@nrc.gov

**RE: Environmental Community Action Inc.(ECO-Action) Comments on the Draft
Environmental Impact Statement for the Plant Vogtle Early Site Permit**

To Whom It May Concern:

Environmental Community Action Inc. (popularly known as ECO-Action) is a statewide non-profit organization working with Georgia communities confronting environmental health threats. For more than 18 years, ECO-Action has provided assistance to over 140 community-based groups to defend their rights to clean air, land, and water. We expand and strengthen the participation of Georgia residents in solving environmental problems and increase public access to information on environmental health hazards, so all may exercise their rights for a healthy environment. We focus our work on those who remain outside the traditional circles of power and influence. We believe that environmental risk assessment as a decision-making framework for protecting human health and the environment has failed to prevent harmful toxic exposures. Therefore, we promote and advocate for the application of the precautionary principle in decision-making that may affect human health and the environment.

ECO-Action is opposed to the Nuclear Regulatory Commission (NRC) recommendation in the draft Environmental Impact Statement (EIS) that supports approval of the early site permit. If Plant Vogtle expansion is permitted, its negative impact will not be limited to the local community in Burke County, but Georgia as a whole and the Southeast region.

Our concerns of the potential impact of the expansion of plant Vogtle are outlined below.

1.0 Water Intake and Draught Concerns

The existing two reactors in Plant Vogtle are currently consuming more water than many towns and cities in Georgia use. Doubling the number of reactors on site will only make this worse. This excess use of water is a threat to municipalities, industries, agriculture, recreation, aquatic species, and local economies.

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Georgia energy choices make a big difference on the sustainability of the river basins and the communities and businesses reliant on those water sources. Vogtle is the largest water user in the Savannah River basin and its expansion essentially doubles that water intake and water loss. The current reactors are losing approximately 43 million gallons of water per day (mgd) and the new reactors will lose approximately 40 mgd. With average per capita daily water use in Georgia at 75 gpd, this means that more water will be lost from the two existing and two proposed reactors at Plant Vogtle than is currently used by all residents of Atlanta, Augusta, and Savannah combined. On page 2-34, the draft EIS says that Burke County is projected to have a 50% increase in water demand by 2035 and that neighboring South Carolina's water demand will also increase by 50% from 2000-2045 and acknowledges that people will be shifting off of the Floridan Aquifer to the Savannah River and simply states that all of this would also increase demands for Savannah River water downstream of Vogtle. But the NRC does not consider this a problem because the NRC calculated that the two new reactors would not decrease the Savannah River flow of today by more than 5%. Nowhere in this document does it appear that the NRC has evaluated how the Savannah River is going to be able to handle the Georgia and South Carolina that we will live in decades from now, that by the NRC's own statements appears to be a future in which the Savannah River is going to see extreme increases in demand. The NRC does not acknowledge that the Savannah River appears to already be over-allocated today, let alone several decades in the future. This needs to be studied and the expected results should be considered in the issuance of the final EIS.

Other aspects of the proposed expansion that would also have water implications along the Savannah River which have NOT been analyzed in the draft EIS include:-

- The dredging of the Savannah River that would be needed to allow for delivery of the necessary construction materials, reactor components, etc. was not fully analyzed, especially in light of the drought conditions that exist and may worsen;
- How lower river flows downstream of Vogtle would impact possible navigation upstream to the plant nor what the then required dredging would do to water quality, sensitive species, etc.
- Benefits of other energy supplies such as energy efficiency and conservation and renewable such as wind, solar, and biomass would have on our water supplies.
- Climate change predictions on our water systems, such as the prospects for severe, long-lasting mega-droughts, of which Georgia may encounter as global warming impacts are realized.
- Large impacts from water vapor (classified as greenhouse gas by EPA).
- Severe draught that has pitted municipalities, businesses, and citizens against each other
- The cumulative impacts on water quality and quantity
- Inadequate evaluation of the full impacts of a severe, long-lasting drought on the Savannah River basin.

The above outlined aspects that were not analyzed in the draft EIS should be studied and considered before issuing the final EIS.

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2.0 Potential Impact on Community Health and Precautionary Action

Residents of Burke County environs are already burdened by high infant mortality rates and high rates of cancer mortality, toxic waste sites, discrimination, and poverty, and that there have been studies (Pilgrim 1 in Plymouth MA, TMI, Spain) and a recent meta-analysis of childhood leukemia (studies conducted in US, Canada, Europe, and Japan) indicating increased risk of cancers in the vicinity of nuclear power plants that should be taken seriously in an EIS. The proposed expansion will make matter worse. Find attached a map of toxic waste sites and chemical plants with air emissions (Toxics Release Inventory or "TRI" sites) and an excel file with the names of the sites and addresses. The proximity of these toxic wastes sites and chemical plants to Plant Vogtle and local community suggest a need to consider these factors before a final EIS is issued.

A 1982 Congressional report estimated that if a meltdown occurred at just one of Vogtle's reactors it could cause 39,000 peak* early injuries, 4000 peak cancer deaths, and 200 peak early fatalities with costs over \$60 billion; building more reactors will only worsen these terrible impacts and put more people's lives and health at risk. These communities are already heavily burdened by pollution in the area. (*Peak means highest calculated value from the study – it does not necessarily mean worst case.). Therefore, we need to apply the precautionary principle in making decision in the best interest of public health and the environment. We have credible evidence to show that we must produce electricity needed through less risky energy supplies such as energy efficiency, solar, wind, and biopower.

There are grave concerns about the adequacy of the NRC permit process for the proposed Plant Vogtle nuclear expansion. Can the NRC permit process truly put human health/environment before profit? The EIS failed to analyze impacts to construction workers on Vogtle 3 & 4 should a radiological accident occur at Vogtle 1 & 2. For instance, section 2.12.3 of Southern's license renewal application states that the NRC will do a cumulative water analysis in this draft EIS for the early site permit. From our review, the cumulative impacts on water quality and quantity have not been satisfactorily evaluated in the draft EIS for the early site permit. That is a problem not only for the ESP but also for the license renewal.

3.0 Nuclear Waste Hazard

High-level radioactive waste created (used nuclear fuel) has no place to be stored or disposed, nor is it likely that a 'solution' will be found in our lifetimes; building more nuclear reactors will only make this situation worse. Existing and future projected waste will remain onsite at Plant Vogtle for generations and generations, threatening indefinitely the health of nearby communities and the environment. The NRC in previous cases has refused to even address or consider this very important issue. We believe this is a serious issue that must be addressed in the Final EIS!

4.0 Energy Efficiency and Clean Renewable Energy

The draft EIS failed to fully research other energy choices. The draft EIS analyzed only conventional, large, centralized power sources, such as coal, oil, hydro. In its analysis of renewable energy, it dismissed wind and solar power as not suitable to 1,000-megawatt power plant use. The fair alternative to consider is decentralized renewable energy sources leased to individual electricity users: businesses, residents and industries. The power company would establish a profitable program, which integrates power production directly with the area being served. Hooked to the grid, the customer who uses less electricity than it generates sells the excess power directly to the power company for other customers to use ... a powerful incentive to conserve which would impact the equation on production/consumption. Renewable energy supplies are available here in Georgia, such as biopower, solar, and wind. Furthermore, NRC should seriously consider the following observations (evidences and studies) that were not considered in the draft EIS.

- According the Georgia Environmental Facilities Authority report (*Meeting Future Electricity Demand*, GA Environmental Facilities Authority, 2006), Georgia has the potential to meet 1518-1618 MW of the state's forecasted electricity demand through **new** renewable resources from biomass, wind, hydropower, landfill gas, and solar photovoltaic.
- Energy efficiency programs can save more electricity in a much shorter time and at less than half the cost of producing that electricity from a new nuclear or coal power plant.
- The National Renewable Energy Laboratory released certified wind maps of Georgia in October 2006 that showed there is substantial wind power available, especially offshore, with a potential of well over 10,000 MW. (website at www.gawwg.org for background). Yet Section 9.2.3.2 on wind power doesn't mention this potential, instead relying on Southern's slanted wording of a study they did with Georgia Tech that "technology limitations and regulatory restrictions would make development of offshore wind projects difficult in the southeast." Instead of taking Southern's word for it, the NRC should actually review the offshore wind study with Georgia Tech that was released in part earlier this summer and is now finalized ready for release.
- The potential to use Georgia's plentiful agriculture and forestry resources should be more closely evaluated as the benefits include increased self-sufficiency, improved water resource quality, and long-term environmental and rural development benefits. A University of Georgia 2003 study that showed that as much as 12% of Georgia's total electricity demand could be generated from biomass was referenced by the NRC in Section 9.2.3.8, but the NRC dismissed biomass as not being economically competitive with existing technologies. Georgia Power's plan filed with the Georgia PSC this year shows there are competitive biomass projects.
- The analysis of energy efficiency is deficient. This issue is still under review by the Georgia PSC as a result of analytical questions that arose in reviewing Georgia Power's Integrated Resource Plan this year. The PSC has ordered a working group to examine these issues further. Energy efficiency and conservation represent the quickest, safest, cheapest way to provide more power and to best protect our air and water resources.

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As an added benefit, increased energy efficiency reduces water use and consumption by power plants that compete with local industries and cities for much needed water. The NRC should be aware that in 2001, the Energy Information Administration ranked Georgia 8th in the nation for per capita energy consumption for electricity and 40th in per capita spending on energy efficiency programs and that Georgia is an energy exporting state.

Conclusion

A lack of a comprehensive review of the Vogtle expansion proposal is evident in the draft EIS. We request NRC to conduct a comprehensive review of the Vogtle expansion proposal. It is the NRC's responsibility to ensure that a full environmental impact review is done. In the final analysis, we hope that NRC recommendation in the final EIS will suggest a need to abandon this risky nuclear expansion. In view of the aforementioned concerns and others, the proposed expansion of Plant Vogtle is NOT acceptable as it poses severe hazards to public health and environment and not in the best interest of ratepayers and taxpayers. Thank you for your consideration.

Respectfully,

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Attachment: * [Toxic waste sites and chemical plants with air emissions \(Toxics Release Inventory or "TRI" sites\)](#) *Excel file with the names of the sites and addresses

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Map_ID	SITE_NAME
1	SMITH WRECKING SERVICE
2	JACKSONBORO BRIDGE DRUM SITE
3	SCREVEN LANDFILL
4	BADISCHE CORP
5	TORRINGTON CO SYLVANIA BRG PLT
6	US STEEL AGRICHEM/OLD BLUE CHEMICAL
7	STEVENSON DRUM DISPOSAL
8	BILLY MAIN PESTICIDES SITE
9	ALLENDALE COUNTY AIRPORT/AG. CHEM. SITE
10	SANDOZ INC/SANDOZ COLORS & CHEMS
11	GA POWER CO VOGTLE STEAM ELEC GEN
12	WAYNESBORO OLD CITY DUMP SITE
13	BURKE COUNTY PESTICIDES WAREHOUSES
14	WAYNESBORO INDUSTRIES INC
15	GIBSON/CARROLL LEAD & OIL SITE
16	CHEM-NUCLEAR SYSTEMS
17	BARNWELL SEED & SUPPLY
18	SHURON-CADLE RED ROUGE SITE
19	BARNWELL TOWN DUMP
20	ALUMINUM FINISHING OF SOUTH CAROLINA
21	RITEWAY MACHINE COMPANY
22	BARNWELL COUNTY LANDFILL
23	REYNOLDS ROAD CONTAMINATION AREA
24	OLD BARNWELL CO. DUMP
25	OLIN CORP. (AREAS 1,2 & 4)
26	RUETGERS-NEASE CHEMICAL CO AUGUSTA PLT
27	MONSANTO CORP. (AUGUSTA PLANT)
28	GENERAL ELECTRIC CO SERVICE SHOP
29	ADMIRAL HOME APPLIANCES
30	TEXTRON INC
31	HARLEY BAG DRUMSITE
32	ZY-US ARMY CAMP HANCOCK
33	MARBON ASSOCIATES NEW ELLENTON PROPERTY
34	CEDAR CREEK WASTEWATER PLANT
35	TRICHECK SEEDS
36	SOUTHERN WOOD PIEDMONT CO
37	NIXON ROAD JUNK YARD #1
38	NIXON ROAD JUNK YARD #2
39	GEORGIA & CAROLINA WASTE CO.
40	ALLEN C AND BFOSTER TOWING
41	J.C. STOCKTON AND SON
42	AUGUSTA HARDWOOD
43	STEPHENS APPLIANCE & TRUCKING
44	CENTRAL LUMBER CO.
45	ADRA'S AUTO
46	VICTORIA DRIVE JUNKYARD
47	THERMAL CERAMICS
48	BOWLES ROAD JUNKYARD
49	M'S SALVAGE
50	AUGUSTA PLATING

51	YOUNGBLOODS GRADING & LANDSCAPING
52	DUPONT E I DE NEMOURS & CO
53	J.L. WASTE OIL
54	NORTHFOLK SOUTHERN CORPORATION
55	NIXON RD NEIGHBORHOOD GRNDWTR CONTAM
56	SAVANNAH PLACE SUBDIVISION
57	COLUMBIA NITROGEN CORP
58	NIPRO INC
59	IMC
60	AUGUSTA WOOD PRESERVING CO INC
61	CHEMICAL LEAMAN TANK LINES INC
62	BLACKMAN-UHLER CHEM DIV AUGUSTA PLT
63	WILLISTON TOWN DUMP
64	TEXACO INC BOARDMAN OIL CO
65	CASH BATTERY CO
66	MORELAND MCKESSON
67	MORELAND MCKESSON CO
68	RICHMOND COUNTY HWY 56 LOOP RD LDFL
69	R.J TRUCKING CO.
70	ELAM RESIDENCE
71	WALL TIRE COMPANY
72	JENKINS SCHOOL
73	AUGUSTA GAS LIGHT (COAL GAS FACILITY)
74	SIMKINS SEED CO.
75	NEW SAVANNAH ROAD LDFL
76	CITIES SERVICE CO/AUGUSTA PLANT
77	BLANCHE MILLS SITE
78	COLONIAL BAKING OF AUGUSTA
79	GOODRICH STREET LANDFILL
80	WALDEN DRIVE OLD LDFL SITE
81	WILLOW CREEK TOWNHOUSE LANDFILL
82	CARPENTER-GRADY FISHPOND LDFL
83	AIKEN COUNTY LANDFILL (FORMER)
84	AIKEN COUNTY LANDFILL
85	CLEARWATER FINISHING SITE
86	POWDER HOUSE ROAD PESTICIDE SHACK
87	REIMER DRUM SITE
88	OLD LANGLEY DUMP
89	SIMKINS FARM SITE
90	NORTH AUGUSTA CITY DUMP
91	KIMBERLY CLARK CORP
92	FMC CORP.
93	HARVEY HUBBLE, INC.
94	SAVANNAH RIVER PLANT/ADMINISTRATION BLDG
95	OWENS-CORNING/STORM WATER POND
96	LANGLEY POND
97	GRANITEVILLE CEMETARY DUMP
98	GRANITEVILLE CO/LAGOON
99	GRANITEVILLE COMPANY/TOWNSEND DIVISION
100	OLD SHAWS CREEK DUMP
101	GRANITEVILLE CO/VAUCLUSE LDFL

STREET_ADDRESS	COUNTY
JCT SR 21 & COUNTY RD 213	SCREVEN
JCT US HWY 301 & GA HWY 24	SCREVEN
ROCKY FORD HIGHWAY	SCREVEN
MIMS RD GA HWY 21	SCREVEN
FRIENDSHIP RD	SCREVEN
CORNER OF SUMTER & 17TH STREETS	ALLENDALE
NEAR COUNTY ROADS 52 & 344 INTERSECTIC	ALLENDALE
S3-19 & S3-69, .2 MI NW OF INT	ALLENDALE
S-336	ALLENDALE
HWY 102	ALLENDALE
OLD RIVER RD GA HWY 23	BURKE
JCT GA HWY 56 & 80	BURKE
STATE HIGHWAY 24	BURKE
DAVIS & MILL RDS	BURKE
COUNTY RD 416, OFF US 321	BAMBERG
OBBORNE RD & S C HWY 64	BARNWELL
2027 JACKSON ST	BARNWELL
US 278 SOUTH	BARNWELL
SR 607	BARNWELL
566 FULDNER ROAD	BARNWELL
HIGHWAY 70 E AT COUNTY RD 195	BARNWELL
CO. RD. 41, 0.4 MI. NORTH OF CO. RD. 169	BARNWELL
COUNTY ROAD 626 AT CO. RD. 41	BARNWELL
CO. RD. 41, 1.5 MI N OF CO. RD. 169	BARNWELL
HWY LOOP 56	RICHMOND
500 CLANTON RD ROUTE 3	RICHMOND
MARVIN GRIFFIN RD	RICHMOND
NEW SAVANNAH RD	RICHMOND
INDUSTRIAL BLVD;(SEE CM FORM)	BARNWELL
MARVIN GRIFFIN RD	RICHMOND
5 MI FRM INTERSCT I-26/US 176	SPARTANBURG
DANIEL FIELD AIRPORT	RICHMOND
603 MAIN STREET	AIKEN
WHITE POND RD. #488	AIKEN
2526 OLD SAVANNAH ROAD	RICHMOND
1650 NIXON RD	RICHMOND
1641 NIXON ROAD	RICHMOND
1645 NIXON ROAD	RICHMOND
NORTON ROAD	RICHMOND
2401 DOUGHTY RD	RICHMOND
1710 NORTON ROAD (BOX 237)	RICHMOND
201 NORTON ROAD	RICHMOND
203 NORTON ROAD	RICHMOND
207 NORTON ROAD (BOX 478)	RICHMOND
VICTORIA DRIVE	RICHMOND
VICTORIA/NORTON DRIVE	RICHMOND
NORTON ROAD AT GORDON HIGHWAY	RICHMOND
240 BOWLES ROAD	RICHMOND
BOWLES ROAD	RICHMOND
3501 CARMICHAEL ROAD	RICHMOND

2215 WINDSOR SPRING RD	RICHMOND
MARVIN GRIFFIN RD	RICHMOND
WINTER ROAD	RICHMOND
CORNER OF MARVIN GRIFFIN AND NEW SAVANNAH RD	RICHMOND
JCT NIXON RD & NORFOLK ST	RICHMOND
11 ST	RICHMOND
COLUMBIA NITROGEN RD	RICHMOND
COLUMBIA NITROGEN RD	RICHMOND
MOLLY POND RD	RICHMOND
115 GWINNETT ST EXTN	RICHMOND
COLUMBIA NITROGEN RD	RICHMOND
GLASS FACTORY AVE	RICHMOND
CO. RD. 22, 0.3 MI E OF CO. RD. 273	BARNWELL
209 SAND BAR FERRY RD	RICHMOND
128 SAND BAR FERRY RD	RICHMOND
COLUMBIA NITROGEN RD.	RICHMOND
COLUMBIA NITROGEN DR	RICHMOND
NEW SAVANNAH RD	RICHMOND
1711-17 NIXON ROAD	RICHMOND
241 BOWLES ROAD	RICHMOND
NORTON ROAD	RICHMOND
101 DAN BOWLES RD	RICHMOND
805 EIGHTH STREET	RICHMOND
1129 BROAD ST.	RICHMOND
JCT GORDON HWY/NEW SAVANNAH RD	RICHMOND
COLUMBIAN NITROGEN RD	RICHMOND
605 12TH STREET	RICHMOND
1500 WRIGHTSBORO RD @ 15TH ST	RICHMOND
GOODRICH ST	RICHMOND
2327 WALDEN DRIVE	RICHMOND
2311 MIDDLETON COURT	RICHMOND
JCT GRADY ST & WHEELER RD	RICHMOND
HWY 421	AIKEN
SC RD S-2-200	AIKEN
SC RD 126 AT US HWY 1/78	AIKEN
POWDER HOUSE ROAD	AIKEN
SC 421 @ JCT OF DIXIE CLAY RD	AIKEN
DUNCAN RD AT COUNTY RD 1920	AIKEN
JCT S R 65 & S R 125	AIKEN
WOMRATH	AIKEN
BEECH ISLAND MILL	AIKEN
15 WINDHAM BLVD	AIKEN
2200 RICHLAND AVENUE	AIKEN
SC HWY 19, 15 MI S OF AIKEN	AIKEN
HWY 215	AIKEN
S.C. 421 & CO. RD. 254	AIKEN
2000'S. OF GREGG HWY & 2700' E OF RT 191	AIKEN
MARSHALL ST	AIKEN
BREEZY HILL ROAD	AIKEN
US HWY 1 AND STATE RD 283	AIKEN
HWY 191 (SENN ST)	AIKEN

[illegible]

AUGUSTA	GA
AUGUSTA	GA
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AUGASTA	GA
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WILLISTON	SC
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AUGUSTA	GA
AUGUSTA	GA
AUGUSTUTA	GA
CLEARWATER	SC
CLEARWATER	SC
CLEARWATER	SC
AIKEN	SC
BATH	SC
LANGLEY	SC
BEECH ISLAND	SC
NORTH AUGUSTA	SC
BEECH ISLAND	SC
AIKEN	SC
AIKEN	SC
AIKEN	SC
AIKEN	SC
AIKEN	SC
AIKEN	SC
GRANITEVILLE	SC
GRANITEVILLE	SC
GRANITEVILLE	SC
AIKEN	SC
VAUCLUSE	SC

Landfills, TRI, and NPL Sites Near Vogtle

