

Georgia Department of Natural Resource

Environmental Protection Division-Land Protection Branch

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 303

(404) 657-8600; Fax (404) 657-08

Judson H. Turner, Director

August 8, 2013

VIA E-MAIL AND REGULAR MAIL

FILE COPY

AMC International, Inc.
c/o Mr. Chris Callas, CEO
1850 South Cobb Industrial Boulevard
Smyrna, Georgia 30082

Re: Voluntary Investigation and Remediation Plan and Application, April 12, 2013
AMC International Site, HSI No. 10405
310 Brookhollow Industrial Boulevard, Dalton, Whitfield County, Georgia
Tax Parcel IDs: 13-025-01-007, 13-025-01-002, 13-025-01-008, and 13-025-017

Dear Mr. Callas:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) dated April 12, 2013 submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). The VIRP was submitted in lieu of ongoing corrective action reporting required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced property. As part of the VIRP review, EPD also reviewed applicable sections of the Semi-Annual Monitoring Reports received on July 29, 2011 and February 1, 2012 and the Response to Comments letter received November 14, 2011. EPD is approving your voluntary remediation plan, which specifies corrective action consisting of the following:

- Installation of additional groundwater monitoring wells to complete plume delineation;
- Completion of additional soil sampling to delineate the extent of soil contamination;
- Continued operation of existing groundwater recovery, treatment, and re-injection system with additional recovery wells to be installed near the eastern most stream bank;
- Continued operation of the existing soil vapor extraction system (SVE) in the fire release area;
- In situ chemical oxidation (ISCO) injections to be performed in high concentration areas of the fire release and 1,1,1-trichloroethane (1,1,1-TCA) plumes;
- Potential use of area averaging of soil concentrations, fate and transport modeling of groundwater, and/or execution of a uniform environmental covenant (UEC) to demonstrate compliance with the Act.

Therefore, EPD is accepting AMC International, Inc. as a participant as defined in the Act for the following qualifying properties, provided AMC International, Inc. implements the VIRP in compliance with the following schedule and conditions:

Qualifying properties:

310 Brookhollow Industrial Boulevard
Dalton, Whitfield County, Georgia

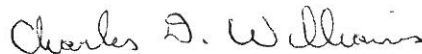
Tax Parcel IDs: 13-025-01-007, 13-025-01-002, 13-025-01-008, and 13-025--017

1. If site terrain allows it, EPD recommends a new monitoring well between the persulfate injection transects and the creek. This well would be used for performance monitoring of the ISCO injection program and for better characterization of the 1,1,1-TCA plume downgradient of DMW-8 and DMW-9.
2. Within six months of detecting regulated substance(s) on a non-qualifying property, the participant must apply to EPD to include the affected property as a qualifying property under the Act or notify EPD the non-qualifying property is not included under the Act.

AMC International, Inc. and the professional engineer/geologist specified in the VIRP are to oversee the implementation of the VIRP in accordance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by AMC International, Inc. However, failure of EPD to respond to a submittal within any timeframe does not relieve AMC International, Inc. from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should AMC International, Inc. fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program.

EPD anticipates receipt of the first semi-annual progress report by February 12, 2014 and a Compliance Status Report, including certifications on or before August 12, 2018. If you have any questions, please contact Montague M^cPherson of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Gregory J. Wrenn, P.E., AMEC

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