

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

November 24, 2015

VIA EMAIL & REGULAR MAIL

Axeon Specialty Products
c/o Janet Ferris, HSE Senior Manager
4 Paradise Road
Paulsboro, New Jersey 08066

Re: Voluntary Investigation and Remediation Plan and Application (August 8, 2015)
Site Investigation Summary Report (September 15, 2015)
Langan Technical Memorandum - LNAPL Pre-Design Investigation Report (October 26, 2015)

Axeon Specialty Products, VRP # 1440101197
7 Foundation Drive, Savannah, Chatham County, Georgia
Tax Parcel ID #'s: 1-065-01-001 and 1-065-01-001L

Dear Ms. Ferris:

The Georgia Environmental Protection Division (EPD) has reviewed the August 8, 2015 Voluntary Remediation Program (VRP) application that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. EPD has also reviewed the September 15, 2015 Site Investigation Summary Report and the October 26, 2015 Langan Technical Memorandum Pre-Design Investigation Report for the above-referenced site providing supplementary information to the VRP Application. EPD is approving your VRP application, which along with the Site Investigation Summary Report and the Langan Technical Memorandum, specifies corrective action consisting of the following:

1. On-site LNAPL recovery utilizing the proposed Multi-Phase Extraction (MPE) System, mobile product skimmer pumps, and a mobile vacuum extraction truck;
2. Further investigation of soil and groundwater conditions, and fate and transport modeling to evaluate potential receptors;
3. Execution of a Uniform Environmental Covenant (UEC), to ensure future control of the site related exposure pathway(s);

Therefore, EPD is accepting Axeon Specialty Products as a participant as defined in the Act for the following qualifying properties provided the VRP application is implemented in compliance with the Act and the following comments:

Qualifying properties:

Axeon Specialty Products
7 Foundation Drive
Savannah, Chatham County, Georgia
Tax Parcel ID #'s: 1-065-01-001 and 1-065-01-001L

Comments:

1. EPD concurs with the LNAPL recovery approach presented in the October 2015 Langan Technical Memorandum Report, which specifies the use of the following three (3) separate recovery systems in

three (3) designated zones of the property: An MPE system, mobile skimmer pumps, and a mobile vacuum truck. Please initiate these recovery systems and present the details of the activities in the next progress report. Please also include a table of the extraction wells used during LNAPL recovery and include the total gallons of free product removed-to-date.

2. During the November 4, 2015 meeting with EPD, Mr. Bill Anderson with Terracon Consultants, Inc. discussed recent well installation, well replacement/repair, and groundwater sampling activities conducted on-site that had not been included in the VRP Application or supplementary data, particularly the over-drill of monitoring well AW-62 and the point of demonstration (POD) well installed near AW-62. Please provide the details, including monitoring well boring logs and sampling data, from the recent well installations and sampling activities in the next monitoring report.
3. The soil and groundwater data presented in the September 2015 Site Investigation Summary Report was primarily collected in close proximity to the subject property boundary. Additional soil characterization is warranted to ensure there is no ongoing source of the LNAPL contamination. Future soil and groundwater characterization may also be appropriate depending on the final VRP certification and risk reduction standards chosen.
4. Table 3 of the October 2015 Langan Technical Memorandum depicts high concentrations of VOCs detected in the air exhaust emitted from vapor and groundwater extraction during pilot testing. As noted in the *System Description* of the report, an alternative vapor treatment to the proposed CatOx unit may be necessary in order to treat the high vapor concentrations expected during water and vapor extraction. Please closely monitor the vapor exhaust to ensure the treatment method is functioning properly.
5. Section 3.2 of the August 2015 VRP application specifies an on-site well that is reportedly only used for increasing the pressure in the lines during turnaround clean out and is not used for drinking water. Water was reportedly last withdrawn from the well in 2011. Although the well is screened within the upper Floridan aquifer at depths greater than 228 feet below ground surface, future soil and groundwater results may warrant samples be collected from the on-site well.
6. The site boundary depicted in Drawing G1 of Appendix C in the October 2015 Langan Technical Memorandum Report is inaccurate and does not include the southwest portion of the property. Please ensure the site boundary is accurately depicted in all future figures.

EPD requires that Axeon Specialty Products and the professional engineer/geologist specified in the VRP oversee the implementation of the VRP 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 Axeon Specialty Products. However, failure of EPD to respond to a submittal within any timeframe does not relieve Axeon Specialty Products from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Axeon Specialty Products 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 June 1, 2016 and a compliance status report, including certification, on or before December 1, 2020. Should you have any question or concerns regarding this site, please contact Mr. Peter E. Johnson, P.G. of the Response and Remediation Program at (404) 657-0490.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Metzger', with a long horizontal flourish extending to the right.

Jason Metzger
Acting Program Manager
Response and Remediation Program

cc: Peter Haid, Axeon Representative (via email)
William Anderson, Terracon Consultants, Inc. (via email)

File: Axeon Specialty Products, 242-0321