

Georgia Department of Natural Resources
Environmental Protection Division

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334
Judson H. Turner, Director
(404) 656-4713; Fax. (404) 651-9425

May 29, 2015

VIA EMAIL & REGULAR MAIL

ConAgra Foods, Inc.
c/o Mr. Chris Aupperle
1 ConAgra Drive
Omaha, NE 68102

Re: HSI Site Number: 10509
Swift Meat Processing Plant
Tax Parcel ID #Mo22A 005
1189 North Main Street
Moultrie, Colquitt County, GA

Dear Mr. Aupperle:

The Georgia Environmental Protection Division (EPD) has received the February 27 2015 Voluntary Investigation and Remediation Plan (VIRP) that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. EPD acknowledges that this VIRP was submitted in lieu of a Corrective Action Plan (CAP) Addendum and Compliance Status Report required pursuant to the Georgia Rules of Hazardous Site Response (the Rules) for the above referenced property. EPD is approving your VIRP, which specifies corrective action consisting of the following:

- Continue monitored natural attenuation (MNA) as approved in the Correction Action Plan (CAP) and continue annual reporting to EPD.
- Utilization of the institutional controls, in the form of Uniform Environmental Covenants (UEC), to ensure future control of the site related exposure pathway(s).

Therefore, EPD is accepting Swift & Company (Swift) as a participant as defined in the Act for the following qualifying properties provided Swift implements the VIRP in compliance with the following schedule and conditions:

Qualifying properties:

Swift Meat Processing Plant

Owner: City of Moultrie

Main Site Property: 1189 North Main Street

Moultrie, Colquitt County, Georgia 31776

Qualifying Property Tax Parcel ID #s: M022A 005, M022A 004, Estate of Rennie Brenda S. Tumlin, P.O. Box 250, Moultrie Colquitt County, Georgia 31776, M022A 002, Joint Development Authority of Brooks, Colquitt, Grady, Mitchell, and Thomas Counties, P.O. Box 250, Moultrie Colquitt County, Georgia 31766.

Schedule

- Semiannual progress reports are to be submitted to EPD. Each progress report must describe all actions taken since the last submittal, and include certification by the professional engineer/geologist specified in the VIRP along with a monthly summary of hours invoiced and description of services provided since the last submittal.

February 2015 Voluntary Remediation Program Application

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- The reporting schedule will be November 29th and May 29th annually, beginning in November 2015 and ending in 2020, unless a compliance status report (CSR) is submitted and approved prior to 2020.
- A CSR including certifications should be submitted by November 29, 2020.

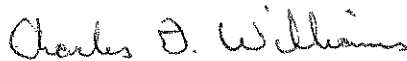
Within six months of detecting regulated substance(s) on a non-qualifying property, the participant must apply to EPD to include the affected property as a qualifying property under the Act or notify EPD that the non-qualifying property is not included under the Act.

Since Swift Meat Processing Plant is performing corrective action at the qualifying property in accordance with an approved VIRP, the qualifying property will be classified as a Class V site and designated as needing corrective action as provided for in §12-8-107(b) of the Act. Within 45 days of this letter, you are required to file an affidavit, if not previously filed, stating that your property has been listed on the state's hazardous site inventory and has been designated as needing corrective action due to the presence of hazardous wastes, hazardous constituents, or hazardous substances regulated under state law. This affidavit is to be filed with the clerk of the Superior Court of Colquitt County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20. Swift Meat Processing Plant must also place the following notice, or revise previous notices recorded pursuant to the Georgia Hazardous Site Response Rules, Chapter 391-3-19-08.

Within 30 days of recording the affidavit or revised affidavit, please send a copy of the receipt of the recorded affidavit to the Response and Remediation Program, Georgia Environmental Protection Division, 2 Martin Luther King Jr. Drive, SE, Suite 1054 East, Atlanta, GA 30334.

EPD may, at its sole discretion, review and comment on documents submitted by Since Swift Meat Processing. Failure of EPD to respond to a submittal within any timeframe does not relieve Since Swift Meat Processing from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Since Swift Meat Processing fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program. Should you have any question or concerns regarding this site, please contact Ms. Elise Chew of the Response and Remediation Program at (404) 463-7555.

Sincerely,



Charles D. Williams

Program Manager

Response and Remediation Program

cc: Ella Fast, City of Moultrie

File: VRP – Swift Meat Processing Plant #10509