

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1066 East, Atlanta, Georgia 30334

Mark Williams, Commissioner

Environmental Protection Division

Judson H. Turner, Director

Land Protection Branch

Keith M. Bentley, Chief

Reply To:

Response and Remediation Program

2 Martin Luther King, Jr. Drive, S.E.

Suite 1462, East Tower

Atlanta, Georgia 30334-9000

Office 404/657-8600 Fax 404-657-0807

April 10, 2013

VIA EMAIL & REGULAR MAIL

Mr. Rob Savarese
Director, Environmental Services
General Chemical Corporation
90 East Halsey Road
Parsippany, New Jersey 07054

Re: January 2013 VRP Application & Plan Approval
General Chemical Site, HSI# 10498
East Point, Georgia
Tax Parcel ID #s 14 013100010176 & 14 013100010184

Dear Mr. Savarese:

The Georgia Environmental Protection Division (EPD) has received the January 2013 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 acknowledges that this VRP application was submitted in lieu of a Corrective Action Plan (CAP) Addendum and Revised Compliance Status Report required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced property. EPD is approving your VRP application, which specifies corrective action consisting of the following:

- Conduct a storm drain assessment and implement any necessary repairs in order to prevent groundwater from entering the storm drain system.
- Continued groundwater monitoring and surface water monitoring activities on a semi-annual basis.
- Institutional controls on affected properties through the placement of Unified Environmental Covenants.

Therefore, EPD is accepting General Chemical Corporation (GC) as a participant as defined in the Act for the following qualifying property provided Avery implements the VRP application in compliance with the following schedule and conditions:

Qualifying property:

General Chemical Corporation Site
1427 East Central Avenue & Martin Street Property
East Point, Fulton County, Georgia 30344
Tax Parcel ID #s 14 013100010176 & 14 013100010184

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.

Because GC is performing corrective action at the qualifying property in accordance with an approved VRP corrective action plan, EPD is hereby reclassifying it from Class II to Class V and designating it 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 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 Fulton County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20.

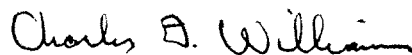
GC must also place the following notice in any deed, mortgage, deed to secure debt, lease, rental agreement or other instrument given or caused to be given by the property owner which creates an interest in or grants a use of the property:

"This 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. Contact the property owner or the Georgia Environmental Protection Division for further information concerning this property. This notice is provided in compliance with the Georgia Hazardous Site Response Act and the Voluntary Remediation Program Act."

Within 30 days of recording the 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 1462, Atlanta, GA 30334.

Should you have any question or concerns regarding this site, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Bobby Triesch, Newell Recycling, LLC
Brian Jacobson, Geosyntec

File: VRP Application 887983819 – General Chemical Site #10498