

Richard E. Dunn, Director

Land Protection Branch

2 Martin Luther King, Jr. Drive Suite 1054, East Tower Atlanta, Georgia 30334 404-657-8600

October 5, 2017

VIA U.S. MAIL AND EMAIL

Sechem, Inc. c/o Giant Cement Holding, Inc. Rachel Odzer, Environmental Projects Manager 654 Judge Street Harleyville, SC 29448

Subject: Voluntary Remediation Program Application dated January 5, 2017

Sechem, Inc., HSI No. 10515

4580 S. Berkeley Lake Road, Norcross, Gwinnett County, Georgia

Tax Parcel No. 6269 007

Dear Ms. Odzer:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program Application (Application) dated January 5, 2017 submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. §12-8-100, et seq. EPD acknowledges that this Application was submitted in lieu of continuing remediation described in the February 2005 Corrective Action Plan and subsequent Addendums, which was required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced site. EPD is approving your Application, which proposes corrective action consisting of the following:

- Semi-annual groundwater and surface water monitoring.
- Soil and groundwater delineation sampling as needed.
- Institutional controls to restrict exposure pathways. A Uniform Environmental Covenant will be executed to restrict groundwater use.
- Groundwater modeling to evaluate groundwater plume stability and the downgradient point of exposure.

Therefore, EPD is accepting Sechem, Inc. (Sechem) as a participant as defined in the Act for the following qualifying property provided Sechem implements the Voluntary Investigation and Remediation Plan (VIRP) contained in the Application in compliance with the Act, the schedule, and the EPD comment letter dated October 5, 2017.

Qualifying Property:

4580 S. Berkeley Lake Road Norcross, Gwinnett County, Georgia Tax Parcel No. 6269 007 VRP Application Approval Sechem, Inc. October 5, 2017 Page 2 of 2

Within six (6) 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 Sechem is performing corrective action at the qualifying property in accordance with an approved Application, 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, the property owner is required to file an affidavit, if not previously filed, stating that the 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 Gwinnett County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20. The property owner must also place the notice, as required by subparagraph 391-3-19-.08(1)(a) of the Rules, in any warranty deed, mortgage, security deed, lease, rental agreement, or other instrument that is thereafter given or caused to be given by the property owner which creates an interest in or grants a use of the property.

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 requires that Sechem and the professional engineer/geologist specified in the Application oversee the implementation of the Voluntary Investigation and Remediation Plan 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 Sechem. However, failure of EPD to respond to a submittal within any timeframe does not relieve Sechem from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Sechem 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 April 5, 2018 and a Compliance Status Report (CSR), including certification of compliance with applicable Risk Reduction Standards, on or before October 5, 2022.

Should you have any questions or concerns regarding this site, please contact Susan Kibler of the Response and Remediation Program at 404-657-7126.

Sincerely,

Program Manager

Jason Metzger

Response and Remediation Program

c: Rachel Andrews, Earthcon (via email) Carol Northern, Earthcon (via email)

File: 226-0328 (VRP)