

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

May 22, 2014

FILE COPY

VIA E-MAIL AND U.S. MAIL

Trademark Metals Recycling, LLC
c/o Brenda Anderson, Environmental Manager
5220 Dover St.
Tampa, FL 33606

Re: Voluntary Investigation and Remediation Plan (VIRP) / Voluntary Remediation Program (VRP) Application
Rice Iron and Metals, Inc. (Former), HSI Site No. 10923
2000 West Savannah Ave., Valdosta, Lowndes County, Georgia 31603
(Tax Parcel No. 0121A 026)

Dear Ms. Anderson:

The Georgia Environmental Protection Division (EPD) has reviewed the March 7, 2013 Voluntary Investigation and Remediation Plan (VIRP)/VRP application submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) for the subject property, which is listed on the Georgia Hazardous Site Inventory as HSI 10923. The VIRP was submitted in *lieu* of a Compliance Status Report or Corrective Action Plan (CAP) pursuant to the Georgia Hazardous Site Response Rules (the Rules).

EPD is approving your VIRP/VRP Application, which specifies corrective action consisting of the following:

- Installation of soil borings across the site to aid in development of the Conceptual Site Model (CSM);
- Installation and sampling of monitoring wells to vertically and horizontally delineate groundwater contamination;
- Installation of Point of Demonstration (POD) monitoring wells;
- Conduct a water usage survey to verify potential receptors;
- Implementation of a semi-annual groundwater monitoring plan until compliance with final cleanup standards is demonstrated;
- Groundwater contaminant fate and transport modeling to determine compliance status with groundwater cleanup standards (to be determined) protective of downgradient point(s) of exposure;
- Engineering and/or institutional controls to be proposed as necessary.

Therefore, EPD is accepting Trademark Metals Recycling, LLC (Trademark) as a participant as defined in the Voluntary Remediation Program Act for the following qualifying properties provided Trademark implements the VIRP in compliance with the following schedule and conditions:

Qualifying property:

2000 West Savannah Avenue
Valdosta, Lowndes County, Georgia
Tax Parcel No. 0121A 026

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.

254-0068
VRP (HSI 10923)
2014
#007

Since Trademark is performing corrective action at the qualifying property in accordance with an approved VIRP, the qualifying property will be reclassified from Class II to Class V 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 Lowndes County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20.

Trademark must also place the following notice, or revise previous notices recorded pursuant to the Georgia Hazardous Site Response Rules, Chapter 391-3-19, 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 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.

Trademark 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 Trademark. However, failure of EPD to respond to a submittal within any timeframe does not relieve Trademark from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Trademark fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the Voluntary Remediation Program.

Based on the date of this approval letter, a Compliance Status Report, including certifications, is to be submitted on or before April 18, 2019.

If you have any questions, please contact Carolyn L. Daniels, P.G. of my office at (404) 657-8646.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

File: 254-0068, VRP