

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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

Judson H. Turner, Director

May 27, 2016

VIA EMAIL & REGULAR MAIL

Man Investment Holdings, Inc. (MIHI)
c/o Solomon Kuckelman
452 Fifth Avenue, 27th Floor
New York, New York 10018

Re: Voluntary Investigation and Remediation Plan and Application (January 21, 2016)
Birdsong Peanut, HSI #10710
608 E. Main Street
Colquitt, Miller County, Georgia
Tax Parcel ID#: C014-027000

Dear Mr. Kuckelman:

The Georgia Environmental Protection Division (EPD) has reviewed the August 31, 2015 Voluntary Investigation and Remediation Plan (VIRP) and associated application signed January 21, 2016 that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. This application will replace the approved December 2009 Corrective Action Plan (CAP) and revised August 2011 CAP for the above referenced property. EPD is approving your VIRP and application, which specifies corrective action consisting of the following:

1. Prepare a Compliance Status Report (CSR) that shows plume stability and request site closure within one (1) year of the approval date of the VIRP and application.
2. Execution of a Uniform Environmental Covenant (UEC), to ensure future control of the site related exposure pathway(s).

Therefore, EPD is accepting Man Investment Holdings, Inc. as a participant as defined in the Act for the following qualifying property provided Man Investment Holdings, Inc. implements the VIRP in compliance with the Act, the schedule, and the following comments:

Qualifying property:

608 E. Main Street
Colquitt, Miller County, Georgia
Tax Parcel ID#: C014 027000

Comments:

1. EPD concurs with the proposed implementation of a UEC, which will prohibit the use or extraction of groundwater at the Subject Property. EPD recommends a draft UEC be submitted for review prior to submittal of the CSR in order to address and revise any issues it may contain.
2. The Conceptual Site Model (CSM) presented in Figures 5 and 6 are incomplete and do not include all required items listed in Item #5 of the VIRP Application Form and Checklist. The Flow Diagram presented in Figure 5 does not provide any site-specific details, including primary source and location data, and does not identify nearby receptors. The lithology in the cross section presented in Figure 6 is


drawn on only four (4) of the nine (9) wells presented on the figure. Please update both figures so that they provide all of the site-specific items required and include revisions in the CSR.

3. Comment #3 of EPD's November 19, 2013 letter requested that boundary monitoring well MW-11 be located and sampled due to the exceedances of total chromium and hexavalent chromium that have previously been reported. Section 5.0 of the May 28, 2014 Groundwater Monitoring Report stated steps would be taken to locate monitoring well MW-11 so that it may be added to the sampling network and that MW-12, MW-14, and MW-16 be located for abandonment. Please explain the progress of locating and abandoning the specified wells.
4. Figure 1 of the VIRP is the only figure which includes the approximate boundary of the Subject Property. Please draw the Subject Property boundary on all future applicable figures to better demonstrate groundwater contamination is not migrating off-site. In addition, please highlight the suspected release area documented as the parts repair shed in Section 5.1 of the VIRP in all future applicable figures.

EPD requires that Man Investment Holdings, Inc. and the professional engineer/geologist specified in the VIRP 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 Man Investment Holdings, Inc. However, failure of EPD to respond to a submittal within any timeframe does not relieve Man Investment Holdings, Inc. from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Man Investment Holdings, Inc. 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 November 30, 2016 and a Compliance Status Report (CSR), including certification, on or before May 29, 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,



Jason Metzger
Program Manager
Response and Remediation Program

cc: Kevin McCartney, BB&J (via email)

File: HSI# 10710