

# **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

October 14, 2014

**VIA U.S. MAIL**

BWAY Corporation  
c/o Mr. Steve Bargeron, EHS Manager  
1601 Valdosta Highway  
Homerville, GA 31634

Subject: Sixth Voluntary Remediation Program (VRP) Progress Report, Dated July 22, 2014 and the August 28, 2014 Meeting Between EPD and ERM/Cornerstone Personnel  
BWAY Drum Site, HSI 10731/VRP1266470869  
NW Quadrant, Intersection of Charley Smith Road and U.S. Highway 84 (Tax Parcel No. 063-026)  
Homerville, Clinch County, Georgia

Dear Mr. Bargeron:

The Georgia Environmental Protection Division (EPD) acknowledges the receipt of the subject submittal prepared and submitted on by Environmental Resources Management (ERM) on behalf of BWAY Corporation (BWAY) and has no comments on said document.

In addition, Ms. Carolyn L. Daniels, P.G. and I met with Mr. Jeff Bilkert and Ms. Amy Hickman of ERM and Bruce Bultman, Cornerstone (as your representatives) on August 28, 2014 to discuss EPD's May 1, 2014 letter that contained several comments on the first through fifth VRP progress reports submitted for the subject site/property. Please find attached for your files a copy of a memo summarizing the results of the discussions held during said meeting.

If you have any questions regarding the attached meeting summary or the site in general, please contact Ms. Daniels directly *via* telephone at (404) 657-8646 *or* email at [carolyn.daniels@dnr.state.ga.us](mailto:carolyn.daniels@dnr.state.ga.us).

Sincerely,



David Reuland  
Unit Coordinator  
Response and Remediation Program

File: 178-0013, VRP

c: Amy Hickman, E.I.T., Environmental Resources Management (ERM)  
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# Georgia Department of Natural Resources


## Environmental Protection Division-Land Protection Branch

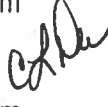
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Judson H. Turner, Director

### MEMORANDUM

TO: David Reuland, Unit Coordinator   
Response and Remediation Program

FROM: Carolyn L. Daniels, P.G., Geologist   
Response and Remediation Program

DATE: September 24, 2014

RE: Summary of Meeting Discussions  
August 28, 2014  
1:00 p.m. - 2:15 p.m.  
BWAY Drum Site, Homerville, Clinch County, GA  
VRP1266470869/HSI #10731

#### **I. Background:**

The site was originally placed on the Georgia Hazardous Sites Inventory (HSI) based on a known release of methyl ethyl ketone in groundwater at levels exceeding the reportable quantity and the location of a drinking water well within one-half mile. Several additional volatile organic compounds (VOCs), including naphthalene and vinyl chloride, were subsequently detected in soil and groundwater at the site. The assumed sources, several buried drums and soil impacted by the release, were excavated and removed from the site with subsequent confirmation sampling indicating the remaining soil was in compliance with residential risk reduction standards (RRS). However, groundwater was found to be impacted by naphthalene at concentrations greater than applicable groundwater RRS. Additional remedial actions have consisted primarily of in-situ chemical oxidation and several years of groundwater monitoring.

EPD accepted the subject site (BWAY property) into the Georgia Voluntary Remediation Program (VRP) in a letter dated July 22, 2011 pursuant to the Georgia Voluntary Remediation Program Act (the Act) based on a revised Voluntary Investigation and Remediation Plan (VIRP) dated January 25, 2011 and previously submitted information. The VIRP recommended that the site be removed from the HSI based on the site's compliance with residential RRS for soil and the conclusion that potential receptors will not be impacted by the groundwater contamination based on the results of groundwater contaminant (naphthalene) fate and transport modeling. A total of six semi-annual VRP progress reports have been submitted to date. EPD responded to the first five progress reports in a letter dated May 1, 2014 which included several comments regarding noted deficiencies, etc. The sixth progress report, which documented that there no additional investigation or monitoring results were acquired since submittal of the fifth report, was received by EPD after issuance of the May 1, 2014 letter.

Ms. Amy Hickman, of ERM, the environmental consulting firm for the site, requested the subject meeting between representatives of their firm, BWAY (the current site property owner), and Ms. Carolyn L. Daniels, P.G. and Mr. David Reuland of EPD to discuss comments in the May 1, 2014 EPD comment letter and future actions necessary to delist the property from the HSI.

#### **II. Meeting Summary:**

The requested meeting was convened at approximate 1:00 p.m. on August 28, 2014 on the 10<sup>th</sup> Floor of the Sloppy Floyd Veteran's Memorial Building in Atlanta, Georgia. Attendees included:

<u>Name</u>	<u>Representing</u>
Bruce Bultman,	Cornerstone
Amy Hickman	ERM
Jeff Bilkert	ERM
David Reuland	GA EPD
Carolyn L. Daniels, P.G.	GA EPD

Mr. Bilkert introduced the attendees representing ERM and Cornerstone. A discussion ensued regarding EPD comments in the May 1, 2014 letter, requirements for establishing site-specific cleanup standards, and requirements for delisting the subject site (BWAY property). The following conclusions were arrived at based on said discussion:

- EPD concurred with ERM that installation of additional shallow contaminant delineation wells as required in the third bullet item of Comment # 3.g.ii of the May 1, 2014 EPD letter would result in excessive costs due to surface conditions at the site and will not require that they be installed. However, BWAY should proceed with the installation, and sampling, of a deep-screened monitoring well in the northeastern corner of the BWAY property at the location described in Comment 3.g.i of the same letter to establish vertical delineation of groundwater contamination. Groundwater samples should be analyzed for the parameters referenced in the comment at a minimum. *Note:* Analytical results obtained during the monitoring event immediately following well installation will not be sufficient to establish deep surficial aquifer conditions at that location.
- BWAY should continue with established groundwater monitoring events and reporting until submittal of a final CSR for the property. The next VRP semi-annual progress report is to be submitted to EPD on or before January 22, 2015.
- EPD concurred that BWAY will not have to collect, and analyze, soil samples referenced in EPD Comment #2c since elevated photoionization readings for the referenced soil samples were representative of the capillary fringe and not vadose soil. However, additional soil sampling may be required if the groundwater contaminant plume does not behave as anticipated in the future.
- EPD may delist a site based on conclusions provided in a CSR. However,
  - BWAY must establish plume stability, or shrinkage, which may include contaminant trend analysis, contaminant plume maps over time, *etc.* to establish site-specific cleanup standards. A computer groundwater contaminant fate and transport model will not be necessary as it will be difficult, if not impossible, to adequately calibrate it to current site conditions. Groundwater analytical results obtained for the Brockway Standard (now BWAY) facility (HSI 10032) may be used for said purpose as necessary.
  - BWAY should submit, for EPD review, a draft environmental covenant restricting property usage and an Operations & Maintenance (O & M) Plan for continued monitoring of groundwater after site delisting prior to submittal of a final CSR as appropriate to prevent delays in delisting. *Note:* EPD can require up to 5 years of post-delisting monitoring the groundwater contaminant plume's stability. BWAY must provide justification for the monitoring network and schedule to be proposed in the O&M Plan. The environmental covenant should include the O & M Plan by reference only to allow for revisions as necessary without requiring modifications to the final covenant.
- BWAY must submit a final CSR demonstrating the BWAY property (the site) that confirms the consistency of the corrective action with the provisions, purposes, standards, and policies of the VRP and certifying the compliance of the relevant voluntary remediation property with the applicable cleanup standards in effect at the time on or before January 22, 2016.

The meeting was adjourned at approximately 2:15 p.m.

## II. Action Items:

None for EPD until the next submittal has been received for review.



