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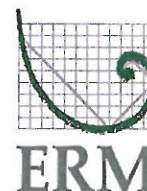
Environmental  
Resources  
Management

3200 Windy Hill Road, SE  
Suite 1500W  
Atlanta, GA 30339  
678.486.2700  
404.745.0103 (fax)

**Response and Remediation Program**

January 22, 2015  
0121022

Ms. Carolyn Daniels  
Response and Remediation Program  
Georgia Environmental Protection Division  
2 Martin Luther King, Jr. Drive, SE  
Suite 1054, East Tower  
Atlanta, Georgia 30334-9000



Subject: Submittal of the Seventh Semi-Annual Progress Report  
to the VRP Program for HSI Site No. 10731  
BWAY Corporation - Homerville, Georgia

Dear Carolyn:

This letter is being submitted on behalf of BWAY Corporation (BWAY) for the referenced property (Site). It is intended to serve as the Seventh Semi-Annual Progress Report for this Site since it entered the Voluntary Remediation Program (VRP). The Site was accepted into the Voluntary Remediation Program by way of correspondence from the Georgia Environmental Protection Division (EPD) dated July 22, 2011.

The last semi-annual report was submitted on July 22, 2014 and indicated BWAY's intention to request a meeting with EPD to formulate a clear and concise path forward for this site to achieve closure under the VRP. The meeting was held on August 28, 2014 and was attended by you and Mr. David Reuland of EPD, Mr. Bruce Bultman of Cornerstone (on behalf of BWAY), and Ms. Amy Hickman and Mr. Jeff Bilkert of ERM. EPD issued a memo on October 14, 2014 summarizing the conclusions of the meeting and additional actions required at the site to achieve closure. In summary, these actions include:

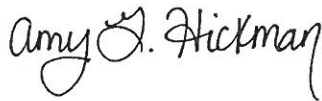
- Installation of a deep-screened monitoring well in the northeastern corner of the site to achieve vertical delineation of groundwater contamination.
- Continuation of established groundwater monitoring events and reporting until submittal of the final CSR for the Site.

- Establish plume stability or shrinkage through contaminant trend analysis and contaminant plume maps over time.
- Submit a draft environmental covenant for EPD review and an Operations & Maintenance (O&M) Plan for continued monitoring of groundwater after site delisting prior to submittal of the final CSR.

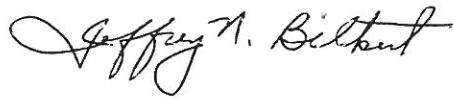
ERM and BWAY are in the process of coordinating installation of the deep well for vertical delineation and performing trend analysis of groundwater concentrations. Additional groundwater monitoring has not been conducted during this reporting period as ERM and BWAY believe sufficient monitoring well data are currently available to conduct trend analyses for the Site and demonstrate horizontal delineation. Once the deep well has been installed it will be sampled a minimum of two times to demonstrate vertical delineation.

The professional geologist certification for this progress report submittal and a summary of hours spent by the professional geologist in the last six months are included as Attachments A and B, respectively. Please contact us with any questions or comments you may have.

Sincerely,



Amy G. Hickman, E.I.T.  
*Project Manager*



Jeffrey N. Bilkert  
*Principal*

Attachments: A – Groundwater Scientist Statement  
B – Summary of P.G. Hours


cc: Steve Barger, BWAY Corporation; Mark Miller, Cornerstone; Bruce Bultman, AEGIS Environmental Inc.


## **ATTACHMENT A - GROUND WATER SCIENTIST STATEMENT**

I certify that I am a qualified ground water scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training and experience in ground water hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding ground water monitoring and contaminant fate and transport.

I further certify that this report for Hazardous Site Inventory Site No. 10731 was prepared by me and appropriate qualified subordinates working under my direction.

A summary of the hours spent by the Professional Geologist is provided in Attachment B, in order to comply with Voluntary Remediation Plan Act.

  
Adria Reimer, P.G.  
Georgia License No. PG002004



1/21/15  
Date

**Attachment B**  
**Documentation of Work Performed by the Professional Geologist**  
**BWAY Drum Site**  
**Homerville, GA**

Month	Number of Hours Invoiced by Adria Reimer, P.G.		Activities Performed by Adria Reimer, P.G. Since the Previous Submittal
Jun-14	0.0	hours	--
Jul-14	2.0	hours	Review Sixth Semi-Annual Report
Aug-14	0	hours	--
Sep-14	1	hour	Meeting with project team to discuss action items form EPD meeting.
Oct-14	0	hours	--
Nov-14	0	hours	--