

# Georgia Department of Natural Resources

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Mark Williams, Commissioner  
Environmental Protection Division  
Judson H. Turner, Director  
Land Protection Branch  
Mark Smith, Branch Chief  
404-657-8600

March 26, 2012

## **VIA E-MAIL AND REGULAR MAIL**

Brunswick Cellulose, Inc.  
c/o Mr. Jay Wright  
1400 West Ninth Street  
Brunswick, Georgia 31520

Re: Voluntary Investigation and Remediation Plan Application, September 30, 2011  
Georgia Pacific – Former Chlorate Plant, Brunswick, HSI No. 10619  
1400 West Night Street  
Brunswick, Glynn County, Georgia  
Tax Parcel ID 03-04993

Dear Mr. Wright:

The Georgia Environmental Protection Division (EPD) has reviewed the September 30, 2011 Voluntary Investigation and Remediation Plan (VIRP) Application submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. EPD has the following comments:

### **Delineation Criteria**

1. Delineation criteria were not presented in the VIRP. However, EPD evaluated the April 2010 Revised Compliance Status Report (CSR), including the December 2010 replacement pages, and concurred on June 30, 2011 that the property is in compliance with Type 1 and Type 3 risk reduction standards (RRS) for soil and not in compliance with any type RRS for groundwater.

### **Groundwater Monitoring**

2. Table 3 presents the proposed groundwater monitoring program detailing which groundwater monitoring wells will be sampled and the respective analyses. Please note EPD requires fate and transport models to be calibrated with an adequate data set from a minimum of 3 monitoring wells located along the centerline of the plume along the principal direction of groundwater flow. Therefore, for fate and transport modeling, the groundwater monitoring program must ensure an adequate number of wells are sampled for a given constituent.
3. Please note the USEPA Science and Ecosystem Support Decision updated the Operating Procedure for Groundwater Sampling (SESDPROC-301-R2) on October 28, 2011.

### **Uniform Environmental Covenant**

4. As discussed in Section 5.1, soils at the property comply with the non-residential Type 3 RRS. Referenced in this section is the annual site reconnaissance to demonstrate continued compliance with the non-residential RRS and inspection report. The annual site reconnaissance and inspection report must be referenced in the restrictive covenant

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or uniform environmental covenant (UEC) discussed in Section 5.2.1. The annual site reconnaissance and inspection report are part of the institutional controls for leaving contamination greater than Type 1 or Type 2 RRS in place. The covenant must be recorded with the Clerk of Glynn County Superior Court and comply with Section 391-3-19-.08(7). A model UEC is available at [www.gaepd/documents/uec.html](http://www.gaepd/documents/uec.html)

**Miscellaneous**

5. The Former Chlorate Plant area should also be highlighted in red on Figure 3.

Brunswick Cellulose, Inc. must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Brunswick Cellulose, Inc. However, failure of EPD to respond to a submittal within any timeframe does not relieve Brunswick Cellulose, Inc. from complying with the provisions, purposes, standards and policies of the Act.

If you have any questions, please contact Kristen Ritter Rivera, P.G. of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee  
Acting Program Manager  
Response and Remediation Program

c: Carol D. Northern, EarthCon Consultants, Inc.  
File: 10619

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