

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

June 13, 2016

VIA E-MAIL AND REGULAR MAIL

Hood Packaging Corporation
c/o Mr. John H. Smith
Vice President, Procurement
25 Woodgreen Place
Madison, MS 39110

Re: Voluntary Investigation and Remediation Plan Review
Hood Packaging Corporation Site, HSI No. 10089
910 River Street, Valdosta, Lowndes County, Georgia
Tax Parcel: 0019A 026

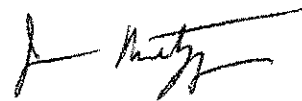
Dear Mr. Smith:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) and application dated September 12, 2014, submitted for the above referenced property (the Property) pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has determined that the property and tax parcel listed above have documented impacts and are eligible for enrollment into the Georgia Voluntary Remediation Program (VRP). EPD is approving your VIRP application, contingent upon settlement of the outstanding alleged violations. Once Items 1 and 3 of Consent Order No. EPD-VRP-013 are completed, the qualifying property will become enrolled and considered "voluntary remediation property" under the Act, and Hood Packaging Corporation will become a participant under the Act, implementing the approved plan in good faith.

EPD's comments on the VIRP are attached. As specified in the Consent Order, these comments must be addressed to EPD's satisfaction in future progress reports.

EPD is in receipt of the executed Consent Order and will be issuing a public notice providing for a thirty (30) day comment period pursuant to Chapter 391-1-3-.01, "Public Participation in Enforcement of Environmental Statutes," prior to execution of the Consent Order. If EPD does not receive any substantive comments, the Order will be finalized and EPD will forward a copy of the executed Consent Order to you. If you have questions regarding the proposed order or comments, please contact Robin Futch, P.G. of the Response and Remediation Program at (404) 657-8686.

Sincerely,



Jason Metzger
Program Manager
Response and Remediation Program

Encl: EPD Comments on VIRP

cc: Doug Cloud, Kazmarek Mowrey Cloud Laseter LLP
File: HSI No. 10089

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Jason Metzger
Program Manager
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ATTACHMENT

EPD Comments on VIRP
Hood Packaging Corporation Site, HSI No. 10089
910 River Street, Valdosta, Lowndes County, Georgia

June 13, 2016

EPD has reviewed the proposed corrective action outlined in the Voluntary Investigation and Remediation Plan (VIRP) dated September 12, 2014 which is comprised of the following activities:

- Further delineation of zinc in surface and subsurface soils in Large Area 4
- Collection of current surface water samples and comparison to applicable standards, which are the Georgia In-Stream Water Quality Standards.
- Excavation and off-site disposal of surface soils from Small Area 1 and Large Area 4, that exceed Type 3 risk reduction standards (RRS).
- Installation of an asphalt cap over remaining areas that exceed Type 3 RRS and fencing around the entire area.
- Injection of material into the upper zone of the first aquifer to increase pH using direct push technology, prior to installation of the cap.
- Installation of a downgradient monitoring well on the City of Valdosta property, in the vicinity of TW-8, to be defined as the point of demonstration well.
- Development and recording of a Uniform Environmental Covenant that outlines site-specific engineering and institutional controls.
- Hood Packaging to work with the City of Valdosta to ensure that no groundwater withdrawal wells are installed on the City property west of the site.
- Groundwater and surface water to be monitored in order to demonstrate that no unacceptable human health or environmental risk exists.

EPD offers the following comments on the VIRP submitted.

1. EPD would like to review a table and figure summarizing the 2010 soil sampling results and locations as well as the analytical reports for these samples. This information should be included in the 1st Semi-Annual Progress Report. In addition, please note that composite samples are not acceptable for delineation purposes. In subsequent reporting, current analytical reports should be provided in addition to the lab certification for Georgia.
2. As part of the final site remedy, a Uniform Environmental Covenant will need to be developed and recorded, outlining institutional controls, i.e., groundwater restriction for the City of Valdosta property downgradient of the site.
3. Further evaluation and discussion of the potential surface water exposure pathway may need to be provided based on current site conditions. The data presented in Exhibit 10 from 1997 to 2001 should be supplemented with more recent data on existing site conditions.
4. Further information should be provided on the proposed material to be injected into the upper zone of the first aquifer to increase pH. In addition, the injected media must comply with the Georgia Rules for Underground Injection Control (Chapter 391-6-3-.13), the

Georgia Rules for Water Quality Control (Revised; Chapter 391-3-6), and the Georgia Rules for Safe Drinking Water (Revised; Chapter 391-3-5).

5. Prior to collecting any groundwater samples, all wells should be redeveloped since the last samples were collected in 2006. In the 1st Semi-Annual Progress Report, please specify which monitoring wells will be sampled and reported on semiannually.
6. EPD can find no record in our files of approval for the Type 4 risk reduction standard (RRS) calculations presented in the May 1, 2007 CAP. Please resubmit the calculations for the Type 4 RRS for arsenic, barium, lead, and zinc if there is any intention to use them as part of the final remedy for the site.
7. The monitoring well IDs are confusing for this site – please append a MW- before each monitoring well location, e.g., MW-SB-11
8. A current water well survey should be completed and documented for the surrounding area as part of the proposed corrective action.
9. Field sampling forms, analytical reports, and a table summarizing the groundwater elevations recorded and used in developing the potentiometric map in the VIRP were not included. These are routine submittals that should be included in all relevant VRP submittals that report on any type of field sampling and analyses. Please include these in subsequent Semi-Annual Progress Reports.
10. For all proposed sampling and monitoring well installation activities, specific information on the methods used should be documented. Please note that the Field Branches Quality System and Technical Procedures supersedes the "Environmental Investigations Standard Operating Procedures and Quality Assurance Manual" (EISOPQAM), November 2001 and provides the relevant guidance documents for all sampling activities. These can be found at <https://www.epa.gov/quality/quality-system-and-technical-procedures-sesd-field-branches>. For example, please note that all groundwater samples should be collected, using procedures consistent with those described in the SESD groundwater sampling operating procedures, currently *SESDPROC-301-R3* (effective March 6, 2013) and all soil samples should be collected using procedures consistent with SESD soil sampling operating procedures, currently *SESDPROC-300-R3* (effective August 21, 2014).

Figures and Tables

11. Figures and tables should be labeled and numbered sequentially and placed in a separate Figures and Tables section.
12. The appropriate, approved risk reduction standards (RRS) or applicable standards (delineation versus cleanup) should be shown on all tables with sampling data and should be provided in the legend for analyte specific isoconcentration maps.
13. Individual isoconcentration figures should continue to be prepared and updated as new data is collected for arsenic, barium, lead, and zinc concentrations detected and solid lines should only reflect those locations for which actual data is provided. For inferred data,

isoconcentration lines should be dashed. In addition, ALL analytical data and the corresponding isoconcentration contours shown on any given figure should be in the same units for the same media.

14. Units should be consistent between figures and tables. For example, on the cross sections showing groundwater results, the data are shown in milligrams per liter (mg/L) while Figure 7 and Table 2 show the groundwater results in micrograms per liter (ug/L).
15. A table of all monitoring well construction details, including date of installation, screen length, etc., should be developed for all new and existing wells on- and off-property and included in each progress report.
16. Please see the attached information sheet which clarifies EPD's document submittal format requirements to be adhered to in all future submittals.



Document Submittal Form

Instructions: This form should be completed and included with any document submitted to the Response and Remediation Program, Response Development Units 1 – 3, that is greater than 25 pages in length or that contains paper sizes larger than 11"x17". This includes Release Notifications and documents related to Hazardous Site Inventory and Voluntary Remediation Program sites. Contact Brownfield Unit staff for Brownfield submittal guidelines. Your cooperation helps to ensure that documents are filed correctly, completely, and efficiently.

Name of Document: Click here to enter text.

Date of Document: Click here to enter text.

Site Name: Click here to enter text.

Site ID Number: Click here to enter text. Enter "NA" if not applicable.

Document Submittal Checklist. Please certify that the submittal includes the following by checking each box as appropriate. Items 1 – 3 should be checked / included / certified for each submittal:

- 1. One paper copy of the document (double-sided is preferred)
- 2. Two compact disks (CDs), each containing an electronic copy of the document as a single, searchable, Portable Document Format (PDF) file. Only one CD is needed for Release Notifications. CDs should be labeled at a minimum with the following: 1) Name of Document, 2) Date of Document, 3) Site Name, and 4) Site Number. Any scanned images should have a resolution of at least 300 dpi and should be in color if applicable.
- 3. The electronic copies are complete, virus free, and identical to the paper copy except as described in Item 4 below.
- 4. (Optional) To reduce the size of the paper copy, certain voluminous information has been omitted from the paper copy and is included only with the electronic copies:
 - laboratory data sheets manifests
 - other: Click here to enter text. Enter "NA" if not applicable.

I certify that the information I am submitting is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Name (Printed): Click here to enter text.

Date: Click here to enter a date.

Organization: Click here to enter text.

Phone: Click here to enter text.

Email: Click here to enter text.

Receipt Date
(for EPD use only)