

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

June 9, 2015

VIA E-MAIL AND REGULAR MAIL

COPY

Miller Brewing Company
c/o Stephen Rogers
3939 West Highland Blvd.
Milwaukee, WI 53201

Re: Revised Voluntary Investigation and Remediation Plan, Including Response to Comments, February 23, 2015 Reynolds Metal Company Property, HSI Site No. 10425
278 Highway 319 South, Moultrie, Colquitt County, Georgia 31768-1299
(Tax Parcel M052 012)

Dear Mr. Rogers:

The Georgia Environmental Protection Division (EPD) has reviewed the Revised Voluntary Investigation and Remediation Plan and Application (VIRP) and Response to Comments dated February 23, 2015, submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD is providing the following comments:

Report Section 3.0 Conceptual Site Model:

- 1) Comment 1 satisfied

Appendix B Warranty Deed and Tax Plat:

- 2) Comment 2 satisfied.

Appendix D Vapor Intrusion Evaluation:

- 3) Comment 3 satisfied.

- 4) Comment 4 satisfied.

Appendix E Ground-Water Modeling Evaluation and Summary:

- 5) Comment 5 not satisfied. Based upon a simple trend analysis on wells within the source area of the contamination plume, we agree with the general conclusions of the MODFLOW, RT3D, and VISUAL MODFLOW flow and transport models; however, we cannot reproduce and confirm the models with the information provided. Please note that in future modeling efforts, the model should include a report with sufficient detail and information such that the reviewer would be able to duplicate the model. The report does not include a description of the model, how it approaches the problem, and its limitations, showing that the model is appropriate for use at the site.

- 6) Comment 6 satisfied.

- 7) Comment 7 is partially satisfied. Please note that the following discrepancies remain: For well ETCMW-113, the 2004 observed value for TCE should be 0.16 and the observed value for cis-1,2-DCE should be 0.066. Additionally, the previous Table 3 was replaced with Table 5, not with Table 6.

General Comments:

- 8) Comment 8 satisfied.

9) Comment 9 satisfied.

10) Comment 10 satisfied.

Report Figures:

11) The following discrepancy remains on Figure 9. EPD understands from the O'Brien and Gere that the Figures are intended to represent the December 2012 analytical concentrations greater than the respective risk reduction standard (RRS). Please resubmit the corrected figure.

	Well	December 2012 Concentration from Table 3 (mg/L)	RRS (mg/L)	December Concentration - RRS (mg/L)	Concentration shown on Figure
Figure 9 (cis-1,2-DCE)	ETCMW-113	0.150	0.07	0.080	0.07

The Miller Brewing Company (MBC) may address comment 11 through the submission of a revised figure, and comment 7 may be addressed in the next progress report that is due by April 30, 2016.

If you have any questions regarding this matter, please contact Susan R Kibler, P.G., of the Response and Remediation Program at (404) 657-0492.

Sincerely,



David Reuland
Unit Coordinator
Response and Remediation Program

c: Sarah Slagle-Garrett, P.E., O'Brien & Gere (via email)
Michael Hall, P.G., O'Brien and Gere (via email)

File: 10425

S:\RDRIVE\skibler\VRP\Applications\Former Miller Can Mfg Plant HSI #10425\Revised Miller Brewing Company VRP NOD Letter.doc