Georgia-Pacific LLC

133 Peachtree Street NE (30303-1847)
P.O. Box 105605
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(404) 652-6166 (404) 654-4701 fax

December 17, 2013

Mr. David K. Reuland
Unit Coordinator
Response and Remediation Program
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Drive, SE, Suite 1054
Atlanta, Georgia 30334

Re: Compliance Status Report Update
Georgia-Pacific LLC – Former Chlorate Plant, Brunswick Site
Brunswick, Glynn County, Georgia
HSI Site No. 10619

Dear Mr. Reuland:

Enclosed are one paper copy and two (2) compact disc (CD) copies, in a searchable PDF format, of the Compliance Status Report (CSR) Update for the Georgia-Pacific LLC – Former Chlorate Plant, Brunswick Site in Brunswick, Glynn County, Georgia. This document was submitted pursuant to Section 12-8-107(e) of the Georgia Voluntary Remediation Program Act O.C.G.A. 12-8-100.

Please feel free to contact me if you have any questions or need additional information at lcforten@gapac.com or (404)652-6166.

Sincerely,

L. Chase Fortenberry, P.G.
Manager – Environmental Engineering

Attachments: Compliance Status Report Update

COMPLIANCE STATUS REPORT UPDATE

FORMER CHLORATE PLANT SITE
1400 WEST NINTH STREET
BRUNSWICK, GLYNN COUNTY, GEORGIA
HSI SITE NUMBER 10619

PREPARED FOR:

BRUNSWICK CELLULOSE, INC.
1400 WEST NINTH STREET
BRUNSWICK, GEORGIA, 31520

and

GEORGIA-PACIFIC LLC
133 PEACHTREE STREET
ATLANTA, GEORGIA, 30303

PREPARED BY:

EARTHCON CONSULTANTS, INC.
1880 WEST OAK PARKWAY
BUILDING 100, SUITE 106
MARIETTA, GEORGIA, 30062
770-973-2100

EarthCon Project No. 02.20060163

December 2013

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COMPLIANCE CERTIFICATION

I certify under penalty of law that this report and all attachments were prepared under my direction in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Based on my review of the findings of this report with respect to the risk reduction standards of the Rules for Hazardous Site Response, Rule 391-3-19-.07, I have determined that this site/property complies with applicable RRS for soil. I have also determined that groundwater at this site/property complies with the provisions, purposes, standards, and policies of the Georgia Voluntary Remediation Program Act (VRPA) and applicable voluntary remediation cleanup standards as referenced in OCGA 12-8-108(7).

David A. Martinez
Vice President – General Manager
Brunswick Cellulose, Inc.

12-13-13
Date

PG CERTIFICATION

"I certify under penalty of law that this report and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, et seq.). I am a professional engineer/professional geologist who is registered with the Georgia State Board of Registration for Professional Engineers and Land Surveyors/Georgia State Board of Registration for Professional Geologists and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances.

Furthermore, to document my direct oversight of the Voluntary Remediation Plan development, implementation of corrective action, and long term monitoring, I have attached a monthly summary of hours invoiced and description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division.

The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Carol Northern

Carol D. Northern, P.G.
Principal Geologist

Registration No. 793
State of Georgia

Date: 12/16/13

1.0 INTRODUCTION

The Brunswick Cellulose, Inc. (BCI) Pulp Mill, located at 1400 West Ninth Street in Brunswick, Glynn County, Georgia, is listed on the Hazardous Site Inventory (HSI) as the "Georgia Pacific Former Chlorate Plant Site, HSI Site #10619" (the Site). The Mill is located between the Turtle River to the west, West Ninth Street to the north, the Brunswick-Altamaha Canal to the east and Academy Creek to the south. BCI is a wholly owned subsidiary of Georgia-Pacific LLC (GP).

2.0 SITE SUMMARY

The BCI Mill property covers approximately 1,061 acres. The Mill compound occupies 650 acres of land containing a fluff pulp mill and associated office buildings. The property also contains primary and secondary wastewater treatment systems. The primary wastewater treatment system consists of a primary clarifier with sludge dewatering. The secondary wastewater treatment system consists of two 6-acre pre-settling basins and an approximately 100-acre aeration lagoon [the aeration stabilization basin (ASB)]. Mill effluent is discharged into the Turtle River. The Mill facility operations are primarily surrounded by wetlands and other surface water bodies. The Mill's wastewater treatment system is regulated under the National Pollutant Discharge Elimination System (NPDES) program.

The BCI Mill has manufactured pulp and paper products since 1938. Currently, the Mill manufactures pulp only. The Mill added a sodium chlorate manufacturing plant as an independent manufacturing facility in the early to mid-1980s. The Mill operated the Former Chlorate Plant (FCP) from the mid-1980s through 1994 and then briefly again in 1996. The Mill closed the FCP in 1996. In May 1999, during excavation work being conducted for storm water sewer installation, chromium was discovered in groundwater underlying the FCP area. This discovery resulted in submittal of a Hazardous Sites Response Act (HSRA) Initial Release Notification for the FCP area on June 9, 1999. The Georgia Environmental Protection Division (EPD) listed the Site on the HSI on March 16, 2000.

From May 1999 until early 2001, numerous site investigation activities were conducted for the FCP area. The results of these activities were submitted to Georgia EPD in the *Compliance Status Report* (CSR), dated March 2001; the *Revised CSR,* dated December 2002; and the *Addendum to*

CSR, dated August 2003. A Corrective Action Plan (CAP) for the FCP area was submitted in early 2003 and a Revised CAP was submitted to Georgia EPD in October 2003.

In March and May 2004, Phase II Environmental Site Assessments (ESAs) were conducted for the entire BCI Mill facility. Results of these activities indicated the presence of regulated substances in soil and groundwater in five areas of the facility. The sampling results were submitted to the HSRA Program in the form of Initial Release Notifications (June 2004) and a report titled *HSRA Summary Report and Supplemental HSRA Release Notification*, dated March 1, 2005.

A summary of investigation activities for both the FCP area and the five areas for which HSRA notifications were submitted in 2004 was provided to the Georgia EPD in the *Revised Compliance Status Report*, dated January 27, 2007. Results of additional soil assessment in the FCP area were submitted to the Georgia EPD in the *Addendum to Revised Compliance Status Report*, dated June 27, 2008. In March 2010, revised risk reduction standards (RRS) were provided to EPD. These RRS were accepted by EPD in a letter dated March 31, 2010. A *Revised Compliance Status Report*, which incorporated the approved RRS, was submitted to EPD in April 2010 (revised pages provided in December 2010). In a letter dated June 30, 2011, EPD approved the Revised CSR and requested submittal of a CAP. In subsequent conversations, EPD indicated that this Site would be a good candidate for inclusion in Georgia's Voluntary Remediation Program (VRP). During a meeting on August 2, 2011, EPD agreed to accept a VRP application in lieu of a CAP.

The Voluntary Investigation and Remediation Plan Application (VIRP) for the BCI Mill facility was submitted to the Georgia EPD on October 4, 2011. The VIRP was approved in a letter dated March 26, 2012.

3.0 CONSTITUENTS/AREAS OF CONCERN

The EPD-approved CSR demonstrated horizontal and vertical delineation of soil and groundwater contamination for the BCI Mill facility. The EPD-approved CSR also demonstrated that all regulated substances detected in site soils comply with applicable RRS. However, regulated substances were detected in groundwater at concentrations in excess of the applicable RRS at three areas.

3.1 Areas of Concern

Based on the extensive sampling performed since 1999, the following areas of concern were identified:

- **Former Chlorate Plant (FCP) Area:** The FCP area covers approximately 1.5 acres within the central portion of the BCI Mill facility and is currently used for the unloading and storage of crystalline sodium chlorate. From mid-1980 through the early 1990s, sodium chlorate was manufactured in both liquid and crystalline forms in this area.

- **Trailer Parking Lot (LOC06):** The Trailer Parking Lot is currently an active staging area used for trailer parking and is critical for Mill shipping logistics. .

- **Process Area (LOC11):** The active Process Area is used to digest wood chips to pulp, wash and bleach the pulp, recover pulping liquors, and generate steam and electricity to support the process. This process requires the use, transportation, and storage of various pulping liquors, fuels, and chemicals.

As described in the approved CSR, the affected portions of the Site are limited to the FCP area, the Process Area, and the Trailer Parking Area. These areas are on property that is solely owned by BCI/GP and, based on delineation presented in the approved CSR, no offsite properties are impacted by these releases.

3.2 Soil Constituents

As documented in the approved CSR, five regulated substances (barium, chromium, copper, nickel and zinc) were present in Site soils at concentrations greater than background values. Concentrations of barium and copper comply with Type 1 or 2 RRS. The concentrations of chromium, nickel and zinc in soil comply with their respective Type 3 RRS. Therefore, the Site is in compliance with applicable RRS for soil.

3.3 Groundwater Constituents

Historical sampling results indicated that 26 regulated substances were detected in groundwater at the Site above background values. As documented in the approved CSR, concentrations of 16 of these regulated substances complied with their respective Type 1 or Type 2 RRS for groundwater. Concentrations of 4-methylphenol and nickel in groundwater comply with Type 4 RRS. The following eight regulated substances were not in compliance with any RRS:

Benzene	Naphthalene
Phenanthrene	Antimony
Arsenic	Chromium
Lead	Mercury

4.0 SUMMARY OF VRP ACTIVITIES

As described in the approved VIRP, corrective action for soils was limited to recording of property notices and an annual site reconnaissance. As required by Rule 391-3-19-.06(6)2, the appropriate property notices of Rule 391-3-19-.08(1) and (2) were recorded with the clerk of Superior Court of Glynn County on May 7, 2012. A copy of the receipt for the recorded Affidavit was provided to Georgia EPD on May 16, 2012. A site reconnaissance was conducted on January 28, 2013 to confirm that the site remains in compliance with non-residential RRS for soils. The *Site Use and Non-Residential Soil RRS Monitoring Evaluation Form*, which demonstrates compliance with Section 391-3-19-.07(8) of the Rules for Hazardous Site Response, was submitted to Georgia EPD on January 30, 2013. Subsequent site reconnaissance and reporting will be conducted in January of each year.

Corrective action for groundwater consisted of institutional controls, groundwater monitoring and groundwater modeling. Activities conducted from March 2012 through October 2013 are described in the following sections.

4.1 Environmental Covenant

Institutional controls will be used to eliminate possible groundwater exposure pathways. To accomplish this, BCI/GP submitted an Environmental Covenant in conformance with the Georgia Environmental Covenants Act to the Georgia EPD on June 8, 2012. On August 31, 2012, Georgia EPD provided BCI/GP with comments to the Environmental Covenant. BCI/GP provided a response to comments on September 6, 2012. On June 26, 2013, Georgia EPD provided BCI/GP with additional comments. BCI/GP provided a response to comments on August 27, 2013. In a letter dated September 27, 2013, Georgia EPD provided final comments to the Environmental Covenant. Justification for omitting language from EPD's model environmental covenant can be found in Appendix A.

Once the CSR Update is approved by EPD, BCI/GP will submit a signed Environmental Covenant with proof of delivery of identical copies to all required parties as specified in Section 44-16-7(a) of the Uniform Environmental Covenants Act.

4.2 Groundwater Monitoring

Groundwater monitoring was conducted as described in the approved VIRP dated October 2011. Groundwater samples were collected during four quarterly sampling events conducted in May, August and November 2012, and February 2013.

Groundwater samples collected from seven wells located in the Former Chlorate Plant (FCP) area (CPW-1, CPW-3, CPW-4, CPW-7, CPW-10, CPW-13, and CPW-14) were analyzed for chromium using EPA Method 6020A. Groundwater samples collected from four wells located in the Trailer Parking Lot (LOC06B-MW-01, LOC06-MW-01D, LOC06-MW-02 and LOC06-MW-04) were analyzed for arsenic, chromium, and nickel using EPA Method 6020A. Groundwater samples collected from nine wells located in the Process Area (LOC11D-MW-01, LOC11B-MW-02, LOC11B-MW-02D, LOC11D-MW-03, LOC11B-MW-05, LOC11-MW-07, LOC11-MW-08, LOC11-MW-09 and LOC11-MW-10) and background well LOC17B-MW-01 were analyzed for benzene, select SVOCs, and select metals using EPA Methods 8260B, 8270C, and 6020A, respectively.

Groundwater samples could not be collected from three monitoring wells that were included in the VIRP. Process Area well LOC11D-MW-04 was abandoned by filling with concrete during facility construction activities. Similarly, Process Area well LOC11B-MW-06 and FCP area well CPW-5 were under newly poured concrete pads. Therefore, these wells were removed from the sampling program. Results of the quarterly sampling events were provided in *the First Semi-Annual Progress Report*, submitted to EPD on September 18, 2012 and the *Second Semi-Annual Progress Report*, submitted to EPD on March 22, 2013.

Per the approved VIRP, dated October 2011, a semi-annual groundwater sampling event would have been required in August 2013. However, based on the results of the groundwater model, the Georgia EPD agreed that additional groundwater monitoring is not required at the Site. Georgia EPD's approval to cease groundwater monitoring was provided in an email dated August 12, 2013.

4.3 Groundwater Modeling

Groundwater modeling was conducted using the data collected during the four quarterly monitoring events. The analytical model BIOSCREEN was used to simulate subsurface transport and to determine the length of time it would take each constituent to reach a down-gradient point of exposure (POE). A discharge calculation was also used to evaluate the effect of constituent migration into the Turtle River. Groundwater modeling results were submitted to Georgia EPD in the *Second Semi-Annual Progress Report*, dated March 22, 2013 and the *Addendum #1 to Second Semi-Annual Progress Report*, dated August 27, 2013.

4.4 Monitoring Well Abandonment

In an email dated August 12, 2013, EPD approved BCI/GP's request to cease groundwater monitoring at the Site. In a follow-up email dated August 26, 2013, EPD approved BCI/GP's request to abandon the Site monitoring wells. From October 28 to 31, 2013, 37 monitoring wells were abandoned. Select wells were retained by the BCI Mill for collection of water level measurements associated with other Site activities. The wells were abandoned in general accordance with the procedures provided in the United States Environmental Protection Agency (USEPA) Region 4 Science and Ecosystem Support Division (SESD) Guidance *Design and Installation of Monitoring Wells, SESDGUID-101-R1*, dated January 29, 2013. A summary of the monitoring well abandonment activities is provided in Appendix B.

5.0 CONCEPTUAL SITE MODEL

A preliminary Conceptual Site Model (CSM) was provided as Section 4.0 of the approved VIRP, dated October 2011. As described in the following sections, the groundwater flow direction and groundwater constituent concentrations are consistent with historical results. Additionally, with execution and filing of the Environmental Covenant, the possibility of exposure to site groundwater through drinking water wells will be eliminated. Therefore, the CSM has not been modified.

5.1 Groundwater Flow

A final round of water level elevation measurements were collected on October 28, 2013 prior to monitoring well abandonment. These water level measurements, which are provided in Table 1, were used to develop a potentiometric surface map for the Site. As shown on Figure 1, an area of higher water level elevations extends through the center of the Mill facility. Groundwater flow east of

this “high” point is locally to the east toward the ASB and other components of the waste water treatment system. Groundwater flow west of this “high” point is to the west toward the Turtle River. Current groundwater flow is consistent with historic groundwater flow.

5.2 Groundwater Delineation

Horizontal and vertical delineation of constituents detected in groundwater were presented in Section 5.2 of the Revised Compliance Status Report, dated April 2010 (revision dated December 2010) which was approved by Georgia EPD in a letter dated June 30, 2011. As described in the CSR, constituents of concern are present in the surficial aquifer only and the vertical extent of regulated substances in groundwater has been defined.

A summary of the concentrations of constituents detected in the FCP Area and the BCI Mill Facility area are provided in Tables 2 and 3, respectively. Figure 2 shows the horizontal extent of locations at the Site with concentrations of regulated substances in surficial groundwater that exceed the delineation criteria.

The concentrations and locations of the constituents detected during the four quarterly monitoring events are generally consistent with previous detections. Concentrations of nickel and 4-methylphenol which previously complied with Type 4 RRS, now comply with Type 1 or 2 RRS. Similarly, concentrations of mercury and antimony which were previously not compliant with any RRS, now comply with Type 1 and Type 4 RRS, respectively. The remaining constituent concentrations have decreased over time. Therefore, the horizontal extent of regulated substances in surficial groundwater has been confirmed and, as shown on Figure 2, is confined to an area within the BCI Mill property boundary.

5.3 Point of Exposure for Groundwater

As described in the approved VIRP, there are no drinking water wells installed in the Surficial Aquifer within a ¼ mile radius of the Site. The delineated groundwater contamination is located within the center of the BCI Mill property. BCI/GP will submit an Environmental Covenant to Georgia EPD which, when executed, will restrict the use of shallow surficial groundwater at the BCI Mill Property to non-potable uses only. Groundwater flow on the western side of the Site is toward the Turtle River. The

down gradient receptors/POE were determined to be the BCI Mill property boundary and the Turtle River.

5.4 Modeling Results

The BIOSCREEN model was used to evaluate constituent migration to the down gradient receptor/POE. For purposes of the model, a groundwater plume was developed for each regulated substance present above applicable RRS in the FCP Area, the Trailer Parking Lot Area, and the Process Area based on the maximum concentration detected in that area during the four quarterly sampling events. Since the delineated site contamination is greater than one thousand feet from the property line in all directions, the assumed down gradient receptor/POE for constituents present east of the center high was the eastern property boundary. When a plume extended on both sides of the center high, the plume was modeled towards both the Turtle River to the west and the eastern property boundary. Results of the model indicated that, without degradation, the travel times for the detected constituents are extremely slow. Additionally, based on dilution concentrations and flow rates, constituent concentrations do not adversely impact the Turtle River.

As required by the approved VIRP, dated October 2011, the *Second Semi-Annual Progress Report*, which included the result of the groundwater modeling, was submitted to Georgia EPD on March 22, 2013. On April 24, 2013, Georgia EPD provided informal comments to the groundwater model. In response to these comments, the groundwater model was revised. The revised model was presented in *the Addendum #1 to the Second Semi-Annual Progress Report* which was submitted to Georgia EPD on August 27, 2013. In a letter dated September 27, 2013, Georgia EPD agreed that the groundwater contamination at the BCI Mill facility will not impact the down gradient receptor/POE.

6.0 SUMMARY

As described in Section 5.2, the horizontal extent of constituents in groundwater above delineation criteria has been defined. Additionally, as demonstrated by the analytical results for the four quarterly sampling events (Tables 2 and 3), the constituent concentrations have remained relatively stable and/or have declined. Results of the groundwater model demonstrate that existing groundwater concentrations are protective of the down-gradient receptor/POE and do not adversely impact the Turtle River.

7.0 MONTHLY INVOICE SUMMARY

Georgia EPD requires that the professional engineer/geologist specified in the VIRP oversee the implementation of the VIRP in accordance with the provisions, purposes, standards and policies of the Georgia Voluntary Remediation Program Act. During the period from August 1 to December 13, 2013, Ms. Carol Northern, P.G. invoiced 62.75 hours on this project. A monthly summary of hours invoiced and a description of services provided is shown in Table 5.

TABLES

Table 1: Summary of Water Level Measurements

Well ID	Top of Casing (ft above MSL)	Ground Surface (ft above MSL)	October 28, 2013 Depth to Water (ft)	October 28, 2013 Potentiometric Elevations
Area 2 Landfill				
GWC-01	9.63	--	6.69	2.94
GWC-02	12.22	--	8.49	3.73
GWC-03	11.49	--	5.79	5.70
Area 5 Landfill				
GWC-04[1]	16.47	--	11.37	5.10
GWC-13	20.59	17.55	18.31	2.28
GWC-14	12.13	8.98	6.66	5.47
Former Chlorate Plant Area				
CPW-1	9.31	9.61	2.19	7.12
CPW-2	9.90	10.10	2.52	7.38
CPW-3	12.11	9.59	4.79	7.32
CPW-4	11.97	9.39	4.71	7.26
CPW-5	12.82	10.32	Well under concrete	
CPW-6	9.60	9.82	2.1	7.50
CPW-7	11.59	9.29	5.09	6.50
CPW-8	9.66	10.13	2.19	7.47
CPW-9	9.46	9.94	1.97	7.49
CPW-10	13.59	11.15	6.81	6.78
CPW-11	11.69	9.36	5.1	6.59
CPW-12	11.88	9.40	6.25	5.63
CPW-13	9.56	10.13	2.05	7.51
CPW-14	12.89	10.40	5.75	7.14
BCI Mill Facility Wells				
LOC01B-MW-01	11.44	8.18	Well damaged	
LOC02B-MW-01	11.73	8.41	6.67	5.06
LOC04B-MW-01	9.65	6.22	6.48	3.17
LOC04C-MW-01	NM	NM	6.03	--
LOC04B-MW-03	11.00	8.39	3.26	7.74
LOC05B-MW-01	15.40	10.37	9.54	5.86
LOC05C-MW-01	15.45	10.39	9.51	5.94
LOC06B-MW-01	24.63	19.74	20.64	3.99
LOC06-MW-01D[2]	20.97	20.91	25.04	-4.07
LOC06-MW-01DA[2]	21.19	21.15	20.75	0.44
LOC06C-MW-01	24.67	19.78	20.51	4.16
LOC06-MW-02	16.95	16.88	12.87	4.08
LOC06-MW-03	8.13	7.97	4.67	3.46
LOC06-MW-04	7.80	7.83	4.04	3.76
LOC07B-MW-01[3]	13.02	10.07	8.72	4.30
LOC11D-MW-01[2]	5.64	5.87	3.07	2.57
LOC11B-MW-02	5.51	5.62	1.19	4.32
LOC11B-MW-02D[2]	5.47	5.60	5.59	-0.12
LOC11B-MW-02DA[2]	5.47	5.56	6.36	-0.89
LOC11D-MW-03[2]	13.30	8.12	4.81	8.49
LOC11D-MW-04	NA	6.43	Well under concrete	
LOC11B-MW-05	8.52	8.81	2.05	6.47
LOC11B-MW-06	5.47	5.65	Well under concrete	
LOC11-MW-07	8.11	8.05	3.29	4.82
LOC11-MW-08	7.58	7.79	2.89	4.69
LOC11-MW-09	8.54	8.60	1.72	6.82
LOC11-MW-10	9.03	9.20	2.31	6.72
Background Wells				
LOC17B-MW-01	0.30	0.49	2.33	-2.03
LOC18B-MW-01	9.53	4.21	6.23	3.30

Notes:
[1]Removed 0.22 feet of casing during May sampling event; change reflected in TOC elevation
[2]Elevation not used to develop potentiometric surface map
[3]Well casing repaired in July 2012; new TOC based on measurement of 2.95 feet of stickup from concrete pad

Table 2: Summary of Groundwater Analytical Results - FCP Area

Well Location	Jul-99	Dec-99	Jun-00	Sep-00	Dec-00	Jan-01	Apr-01	Sep-01	Mar-02	Jul-02	Nov-02	Mar-06	Jul-06	Sep-06	Dec-09	May-12	Aug-12	Nov-12	Feb-13
CPW-1	**1.7**	**1.4**	**0.31**	**0.38**	**0.28**	--	**0.35**	**0.29**	**0.29**	**0.17**	**0.16**	**0.13**	--	--	--	**0.72**	**0.99**	**1.2**	**0.7**
CPW-2	0.044	<0.01	0.029	0.067	0.026	--	0.025	0.028	0.051	0.019	<0.01	na	na	na	na	na	na	na	na
CPW-3	0.033	0.098	0.077	0.037	0.039	--	0.054	0.053	<0.01	**0.16**	**0.17**	**0.48**	--	--	--	**0.45**	**0.36**	**0.87**	**0.57**
CPW-4	--	**2.2**	0.085	0.097	0.043	--	0.019	0.052	0.026	0.027	0.035	**0.72**	--	--	--	**0.11J**	<0.1	0.017J	**0.13**
CPW-5	--	**0.52**	**0.25**	**0.21**	**0.23**	--	**0.14**	**0.22**	**0.15**	0.087	0.071	0.067	--	--	--	na	na	na	na
CPW-6	--	**0.27**	0.086	0.092	0.064	--	0.039	0.049	0.045	0.016	0.051	--	0.1	--	--	--	--	--	--
CPW-7	--	**3.5**	**2.1**	**3**	**3.8**	--	**3.8**	**5.5**	**0.64**	**1.6**	**3**	**5.5**	--	--	--	**26**	**19**	**26**	**15**
CPW-8	--	0.054	0.1	0.025	**0.13**	--	0.1	0.074	0.036	0.011	0.022	--	0.014	--	--	--	--	--	--
CPW-9	--	0.067	0.055	0.37	0.071	--	0.02	0.039	0.036	0.015	0.091	0.05	--	--	0.062	--	--	--	--
CPW-10	--	0.061	0.038	0.061	0.07	--	0.08	0.069	0.072	0.024	0.024	--	**1.4**	--	--	**0.24**	**0.25**	**0.16J**	<0.1
CPW-11	--	0.034	0.022	0.023	0.02	--	0.023	0.025	0.02	0.024	0.037	0.067	--	--	--	--	--	--	--
CPW-12	--	<0.01	<0.01	<0.01	<0.01	--	<0.01	<0.01	<0.01	<0.01	<0.01	--	--	<0.01	--	--	--	--	--
CPW-13	--	--	--	--	--	**0.4**	0.078	0.064	0.039	0.01	0.018	--	0.069	--	**0.47J**	**0.30**	**0.47**	**0.2J**	**0.11**
CPW-14	--	--	--	--	--	0.052	**0.13**	**0.11**	0.085	0.097	**0.14**	0.062	0.066	--	**0.14**	0.057J	<0.1	0.084J	**0.14J**

bold - indicates concentration exceeds delineation criteria of 0.1 mg/L for chromium
na - well not sampled; destroyed
-- well not sampled on this date

Table 3: Summary of Groundwater Analytical Results - BCI Mill Facility

Sample Location	Sample Date	Regulated Substance (mg/L)									
		Organics				Inorganics					
		Benzene	3&4-Methylphenol	Naphthalene	Phenanthrene	Antimony	Arsenic	Chromium	Lead	Mercury	Nickel
Delineation Criteria (mg/L)		**0.005**	**DL**	**0.02**	**DL**	**0.006**	**0.01**	**0.1**	**0.015**	**0.002**	**0.1**
Log Storage Area											
LOC01-DP-01	3/15/04	<0.001	<0.010	<0.010	<0.010	--	--	--	--	--	--
LOC01B-MW-01	5/15/04	--	--	--	--	<0.006	<0.01	0.017	<0.005	<0.0002	0.012
	12/14/04	--	--	--	--	--	--	--	--	--	<0.02
Wood Yard											
LOC02-DP-01	3/16/04	<0.001	<0.010	<0.010	<0.010	--	--	--	--	--	--
LOC02B-MW-01	5/15/04	--	<0.002	--	--	<0.006	<0.01	0.094	**0.019**	<0.0002	0.018
	12/16/04	--	--	--	--	--	--	0.0374	<0.01	--	<0.02
	3/21/06	--	--	--	--	--	--	0.021	--	--	--
Area 4											
LOC05-DP-01	3/11/04	--	<0.010	<0.010	<0.010	<0.03	<0.05	<0.05	<0.013	<0.001	<0.2
LOC05B-MW-01	5/16/04	--	--	--	--	--	--	--	--	--	<0.01
	7/18/06	--	--	--	--	<0.006	<0.01	--	--	--	--
	11/29/06	<0.001	--	--	--	--	--	--	--	--	--
LOC05C-MW-01	5/16/04	--	--	--	--	--	--	--	--	--	<0.01
Trailer Parking Lot											
LOC06-DP-01	3/11/04	<0.001	<0.010	<0.010	<0.010	<0.03	**0.069**	<0.05	<0.013	<0.001	**0.36**
LOC06B-MW-01	12/16/04	--	--	--	--	--	<0.25	--	--	0.00064	**0.691**
	3/21/06	--	--	--	--	<0.1	**0.12**	--	--	<0.002	**0.68**
	12/1/09	--	--	--	--	--	**0.046J**	--	--	--	**0.4**
	3/5/10	--	--	--	--	--	**0.082**	--	--	--	**0.45**
	5/8/12	--	--	--	--	--	**0.016**	<0.1	--	--	**0.13**
	8/7/12	--	--	--	--	--	**0.025**	**0.12**	--	--	**0.22**
	11/5/12	--	--	--	--	--	**0.039**	**0.17**	--	--	**0.31**
	2/4/13	--	--	--	--	--	**0.019**	<0.1	--	--	**0.12**

Table 3: Summary of Groundwater Analytical Results - BCI Mill Facility

Sample Location	Sample Date	Regulated Substance (mg/L)									
		Organics				Inorganics					
		Benzene	3&4-Methylphenol	Naphthalene	Phenanthrene	Antimony	Arsenic	Chromium	Lead	Mercury	Nickel
Delineation Criteria (mg/L)		**0.005**	**DL**	**0.02**	**DL**	**0.006**	**0.01**	**0.1**	**0.015**	**0.002**	**0.1**
LOC06-MW-01D	1/15/10	--	--	--	--	--	**0.081**	--	--	--	**0.41**
	3/5/10	--	--	--	--	--	**0.048**	--	--	--	**0.27**
	5/8/12	--	--	--	--	--	**0.021**	<0.1	--	--	**0.12**
	8/7/12	--	--	--	--	--	**0.037**	**0.17**	--	--	**0.26**
	11/6/12	--	--	--	--	--	**0.039**	**0.19**	--	--	**0.25**
	2/5/13	--	--	--	--	--	<0.01	<0.1	--	--	<0.1
LOC06-MW-01DA	3/5/10	--	--	--	--	--	<0.01	--	--	--	<0.035
LOC06-MW-02	1/14/10	<0.001	<0.0095	<0.0095	<0.0095	<0.006	**0.011J**	**0.15**	<0.01	0.00057	**0.15**
	5/8/12	--	--	--	--	--	**0.017**	**0.12**	--	--	**0.14**
	8/7/12	--	--	--	--	--	**0.013**	**0.21**	--	--	**0.18**
	11/5/12	--	--	--	--	--	**0.013**	**0.12**	--	--	**0.12**
	2/4/13	--	--	--	--	--	<0.01	<0.1	--	--	<0.1
LOC06-MW-03	1/14/10	--	--	--	--	--	<0.01	--	--	--	<0.035
LOC06-MW-04	1/14/10	--	--	--	--	--	<0.01	--	--	--	<0.035
	5/8/12	--	--	--	--	--	<0.01	<0.1	--	--	<0.1
	8/7/12	--	--	--	--	--	<0.01	<0.1	--	--	<0.1
	11/6/12	--	--	--	--	--	<0.01	<0.1	--	--	<0.1
	2/4/13	--	--	--	--	--	<0.01	<0.1	--	--	<0.1
Ash Pad/ESB											
LOC07-DP-01	3/11/04	<0.001	<0.010	<0.010	<0.010	<0.03	<0.05	<0.05	<0.013	<0.001	<0.2
LOC07B-MW-01	5/16/04	--	--	--	--	--	--	--	--	--	<0.01
	7/18/06	--	--	--	--	<0.006	<0.01	--	--	--	--

Table 3: Summary of Groundwater Analytical Results - BCI Mill Facility

Sample Location	Sample Date	Regulated Substance (mg/L)									
		Organics				Inorganics					
		Benzene	3&4-Methylphenol	Naphthalene	Phenanthrene	Antimony	Arsenic	Chromium	Lead	Mercury	Nickel
Delineation Criteria (mg/L)		**0.005**	**DL**	**0.02**	**DL**	**0.006**	**0.01**	**0.1**	**0.015**	**0.002**	**0.1**
Process Area											
LOC11D-MW-01	12/16/04	<0.005	**0.022**	**0.96**	**0.029**	<0.02	--	0.0378	<0.01	<0.0002	0.0202
	7/19/06	0.0035	**0.026**	**0.073**	**0.022**	<0.006	<0.01	0.032	--	--	--
	5/9/12	<0.005	<0.01	0.016	<0.01	<0.006	<0.01	<0.1	<0.015	<0.002	<0.005
	8/9/12	<0.005	<0.0095	0.01	<0.0095	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	11/7/12	<0.005	<0.0099	**0.13**	<0.0099	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	2/5/13	<0.005	**0.028**	**0.45**	**0.025**	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
LOC11B-MW-02	12/15/04	<0.005	**0.022**	**1.6**	**0.18**	**0.0266**	--	<0.01	<0.01	**0.00298**	0.0295
	7/19/06	<0.01	<0.038	**0.74**	**0.065**	**0.2**	--	--	--	**0.0046**	--
	5/9/12	<0.005	**0.17J**	**3.5**	**0.17J**	**0.036**	**0.018**	<0.1	<0.015	**0.0028**	0.028
	8/9/12	<0.005	<0.47	**1.7**	<0.47	**0.026**	**0.027**	<0.1	<0.015	0.002J	<0.1
	11/8/12	<0.005	<0.063	**1.9**	**0.28J**	**0.033**	**0.013**	<0.1	<0.015	<0.002	<0.1
	2/6/13	<0.005	<0.0096	**1.5**	**0.12**	**0.014**	<0.01	<0.1	<0.015	<0.002	<0.1
LOC11B-MW-02D	9/14/06	**0.025**	<0.094	**0.82**	<0.094	<0.006	**0.028**	**0.35**	<0.005	<0.002	0.099
	11/29/06	--	--	--	--	<0.02	**0.011**	0.076	<0.005	0.00021	<0.03
	5/10/12	**0.020J**	<0.025	**1.4**	**0.15J**	**0.0069**	**0.033**	**0.28**	<0.015	<0.002	0.081
	8/9/12	**0.010J**	<0.47	**3**	<0.47	<0.006	**0.025**	**0.32**	<0.015	<0.004	<0.1
	11/8/12	**0.015J**	<0.12	**4.4**	**0.092J**	<0.006	**0.019**	**0.28**	<0.015	<0.002	<0.1
	2/6/13	**0.019J**	**0.16**	**4.8**	**0.14**	0.0047J	**0.02**	**0.29**	0.0023J	<0.0016	0.08J
LOC11B-MW-02DA	12/11/06	<0.001	<0.0097	<0.0097	<0.0097	<0.006	<0.01	<0.01	<0.005	<0.0002	<0.03
LOC11D-MW-03	12/17/04	<0.25	**0.036**	**0.087**	**0.13**	<0.02	--	**0.232**	<0.01	<0.0002	0.0512
	7/19/06	<0.01	**0.13**	**0.25**	**0.19**	<0.006	<0.01	**0.12**	--	--	0.036
	5/10/12	<0.005	<0.0098	<0.0098	<0.0098	<0.006	<0.01	<0.1	<0.015	<0.002	<0.005
	8/9/12	<0.005	<0.0097	**0.048**	**0.03**	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	11/28/12	<0.005	<0.0099	**0.028**	**0.016**	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	2/6/13	<0.005	<0.01	**0.067**	**0.032**	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
LOC11D-MW-04	12/17/04	**0.012**	<0.01	<0.1	**0.023**	<0.02	--	**0.352**	**0.0247**	0.00027	0.0568

Table 3: Summary of Groundwater Analytical Results - BCI Mill Facility

Sample Location	Sample Date	Regulated Substance (mg/L)									
		Organics				Inorganics					
		Benzene	3&4-Methylphenol	Naphthalene	Phenanthrene	Antimony	Arsenic	Chromium	Lead	Mercury	Nickel
Delineation Criteria (mg/L)		**0.005**	**DL**	**0.02**	**DL**	**0.006**	**0.01**	**0.1**	**0.015**	**0.002**	**0.1**
LOC11B-MW-05	5/16/04	0.003	**0.016**	**0.095**	**0.0053**	--	--	<0.01	--	0.00065	0.014
	12/15/04	<0.005	**0.015**	**0.075**	<0.01	<0.02	--	0.0193	<0.01	0.00042	0.0222
	7/19/06	0.0022	<0.0094	**0.06**	<0.0094	--	--	--	--	--	--
	5/10/12	<0.005	**0.013**	**0.085**	<0.0099	<0.006	<0.01	**0.11**	<0.015	<0.002	0.039
	8/9/12	<0.005	**0.016**	**0.083**	<0.0097	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	11/7/12	<0.005	**0.015**	**0.099**	<0.0098	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	2/6/13	<0.005	**0.024**	**0.11**	<0.0098	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
LOC11B-MW-06	5/16/04	<0.001	**0.0056**	**0.12**	**0.013**	--	--	0.036	**0.018**	0.0012	0.039
	12/15/04	<0.005	<0.01	**0.056**	<0.01	<0.02	--	**0.124**	0.0115	0.0018	0.0874
	7/19/06	<0.001	<0.01	**0.11**	<0.01	<0.006	<0.01	<0.01	--	<0.0002	<0.035
LOC11-MW-07	1/15/10	<0.001	<0.0094	**0.16**	**0.039**	--	--	0.018	--	--	--
	5/9/12	<0.005	<0.049	**0.31**	**0.054**	<0.006	<0.01	**0.12**	<0.015	<0.002	0.054
	8/8/12	<0.005	<0.049	**0.26**	<0.049	<0.006	<0.01	**0.15**	<0.015	<0.002	<0.1
	11/7/12	<0.005	<0.0098	**0.24**	**0.041**	<0.006	<0.01	**0.14**	<0.015	<0.002	<0.1
	2/5/13	<0.005	<0.0098	**0.31**	**0.049**	<0.006	<0.01	**0.13**	<0.015	<0.002	<0.1
LOC11-MW-08	1/15/10	<0.001	<0.0094	<0.0094	<0.0094	<0.006	<0.01	0.049	--	<0.0002	--
	5/9/12	<0.005	<0.0096	<0.0096	<0.0096	<0.006	<0.01	<0.1	<0.015	<0.002	0.028
	8/9/12	<0.005	<0.0097	<0.0097	<0.0097	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	11/7/12	<0.005	<0.0096	<0.0096	<0.0096	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	2/6/13	<0.005	<0.0096	<0.0096	<0.0096	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
LOC11-MW-09	1/15/10	<0.001	<0.0094	<0.0094	<0.0094	<0.006	<0.01	<0.01	--	<0.0002	--
	6/18/12	<0.005	<0.0099	<0.0099	<0.0099	<0.006	<0.01	<0.1	<0.015	<0.002	<0.005
	8/9/12	<0.005	<0.0096	<0.0096	<0.0096	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	11/8/12	<0.005	<0.0096	<0.0096	<0.0096	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	2/5/13	<0.005	<0.0099	<0.0099	<0.0099	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1

Table 3: Summary of Groundwater Analytical Results - BCI Mill Facility

		Regulated Substance (mg/L)									
		Organics				Inorganics					
Sample Location	Sample Date	Benzene	3&4-Methylphenol	Naphthalene	Phenanthrene	Antimony	Arsenic	Chromium	Lead	Mercury	Nickel
Delineation Criteria (mg/L)		0.005	DL	0.02	DL	0.006	0.01	0.1	0.015	0.002	0.1
LOC11-MW-10	1/14/10	<0.001	<0.0094	<0.0094	<0.0094	--	--	<0.01	--	--	--
	6/18/12	<0.005	<0.0097	<0.0097	<0.0097	<0.006	<0.01	<0.1	<0.015	<0.002	<0.005
	8/8/12	<0.005	<0.0096	<0.0096	<0.0096	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	11/6/12	<0.005	<0.0099	<0.0099	<0.0099	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	2/5/13	<0.005	<0.013	<0.0069	<0.0076	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
Background											
LOC17B-MW-01	5/14/04	--	--	--	--	<0.006	<0.01	<0.01	<0.005	<0.0002	<0.01
	12/14/04	<0.005	<0.010	<0.010	<0.010	<0.02	<0.05	<0.01	<0.01	<0.0002	<0.02
	5/10/12	<0.005	<0.0098	<0.0098	<0.0098	<0.006	<0.01	<0.1	<0.015	<0.002	<0.005
	8/9/12	<0.005	<0.0095	<0.0095	<0.0095	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	11/7/12	<0.005	<0.0096	<0.0096	<0.0096	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
	2/6/13	<0.005	<0.0098	<0.0098	<0.0098	<0.006	<0.01	<0.1	<0.015	<0.002	<0.1
LOC18B-MW-01	5/14/04	--	--	--	--	<0.006	<0.01	<0.01	<0.005	<0.0002	<0.01
	12/14/04	<0.005	<0.010	<0.010	<0.010	<0.02	<0.05	<0.01	<0.01	<0.0002	<0.02

Notes: -- not analyzed J - estimated concentration
DL - Detection Limit
Bold - detected at concentration above Delineation Criteria
Individual isomers of 3&4-methylphenol were not reported by the laboratory

Table 4: Schedule of VRP Activities

Date	Activity
March 26, 2012	*VRP Application Approved*
April 24, 2012	*Cost Estimate and Financial Instrument Submitted*
May 7, 2012	*Filing of Affidavit with clerk of Superior Court of Glynn County pursuant to O.C.G.A. §44-2-20*
May 16, 2012	*Submittal of copy of receipt of recorded Affidavit to EPD*
May 7-10 and June 18-19, 2012	*First Quarterly Sampling Event and Well Repair Activities*
August 6-9, 2012	*Second Quarterly Sampling Event*
September 18, 2012	*Submittal of First Semi-Annual Progress Report*
November 5-8 and 28, 2012	*Third Quarterly Sampling Event*
January 30, 2013	*Submittal of Annual Site Inspection Form*
February 4-6, 2013	*Fourth Quarterly Sampling Event*
March 22, 2013	*Second Semi-Annual Progress Report*
August 27, 2013	*Third Semi-Annual Progress Report and Addendum #1 to Second Semi-Annual Progress Report*
October 28-31, 2013	*Monitoring well abandonment*
December 17, 2013	*Submittal of Compliance Status Report Update*

Note: Annual Site Inspection Forms will be submitted by January 30 of each year

Table 5: Summary of Monthly Invoices

Month	Hours Billed by Carol Northern, P.G.	Description of Activities
August 2013	21.5	– Revisions to the groundwater model – Preparation and submittal of the Third Semi-Annual Progress Report – Preparation and submittal of the Addendum to the Second Semi-Annual Progress Report
September 2013	3.5	– Review well abandonment procedures and coordinate well abandonment activities
October 2013	6	– Develop scope of work document for well abandonment – Scheduling well abandonment activities
November 2013	12	– Coordination with field team – Preparation of Compliance Status Report Update
December 2013	19.75	– Preparation of Compliance Status Report Update – Review Environmental Covenant

FIGURES

N

CEMETERY

SELDON PARK

ALTAMAHA CANAL

GEORGIA PACIFIC

60' DRAINAGE EASEMENT
NO EVIDENCE OF BEING USED

CITY OF BRUNSWICK

LEASED TO THE
CITY OF BRUNSWICK
17.2 ACRES

CITY OF BRUNSWICK

FORMER CHLORATE
PLANT AREA

AREA 4

MARSH LINE

TURTLE RIVER

BENCHMARK AT
FLAGPOLE
EL = 7.60' msl

LOC04B-MW-01
LOC04C-MW-01
3.17

GWC-01
2.94

GWC-02
3.73

GWC-03
5.70

LOC04B-MW-03
7.74

LOC01B-MW-01
DAMAGED

LOC05B-MW-01
LOC05C-MW-01
5.86/5.94

LOC11-MW-08
4.69

LOC11-MW-09
6.82

LOC11-MW-07
4.82

LOC11-MW-10
6.72

LOC07B-MW-01
4.30

LOC18B-MW-01
3.30

LOC11B-MW-02D

LOC11B-MW-06
UNDER CONCRETE

LOC11B-MW-02
4.32

LOC11B-MW-02DA

LOC06-MW-04
3.76

LOC02B-MW-01
5.06

LOC11B-MW-05
6.47

LOC06-MW-03
3.46

GWC-04
5.10

LOC11D-MW-01
2.57

LOC11D-MW-04
UNDER CONCRETE

LOC06-MW-02
4.08

GWC 14
5.47

LOC06B-MW-01
3.99

LOC06-MW-01DA

LOC11D-MW-03

LOC17B-MW-01
-2.03

LOC06-MW-01D

LOC06C-MW-01
4.16

GWC-13
2.28

2

4

SCALE IN FEET

0 800 1600

LEGEND:

MW-01 *WELL LOCATION*

4 *ESTIMATED GROUNDWATER POTENTIOMETRIC SURFACE, FT. MSL*

GROUNDWATER FLOW DIRECTION

BASE MAP PROVIDED BY: HOLLEY CONSULTANTS DATED: AUG. 1999

BRUNSWICK CELLULOSE, INC.

BRUNSWICK, GEORGIA

PROJECT NO. 02.20060613

EARTHCON®

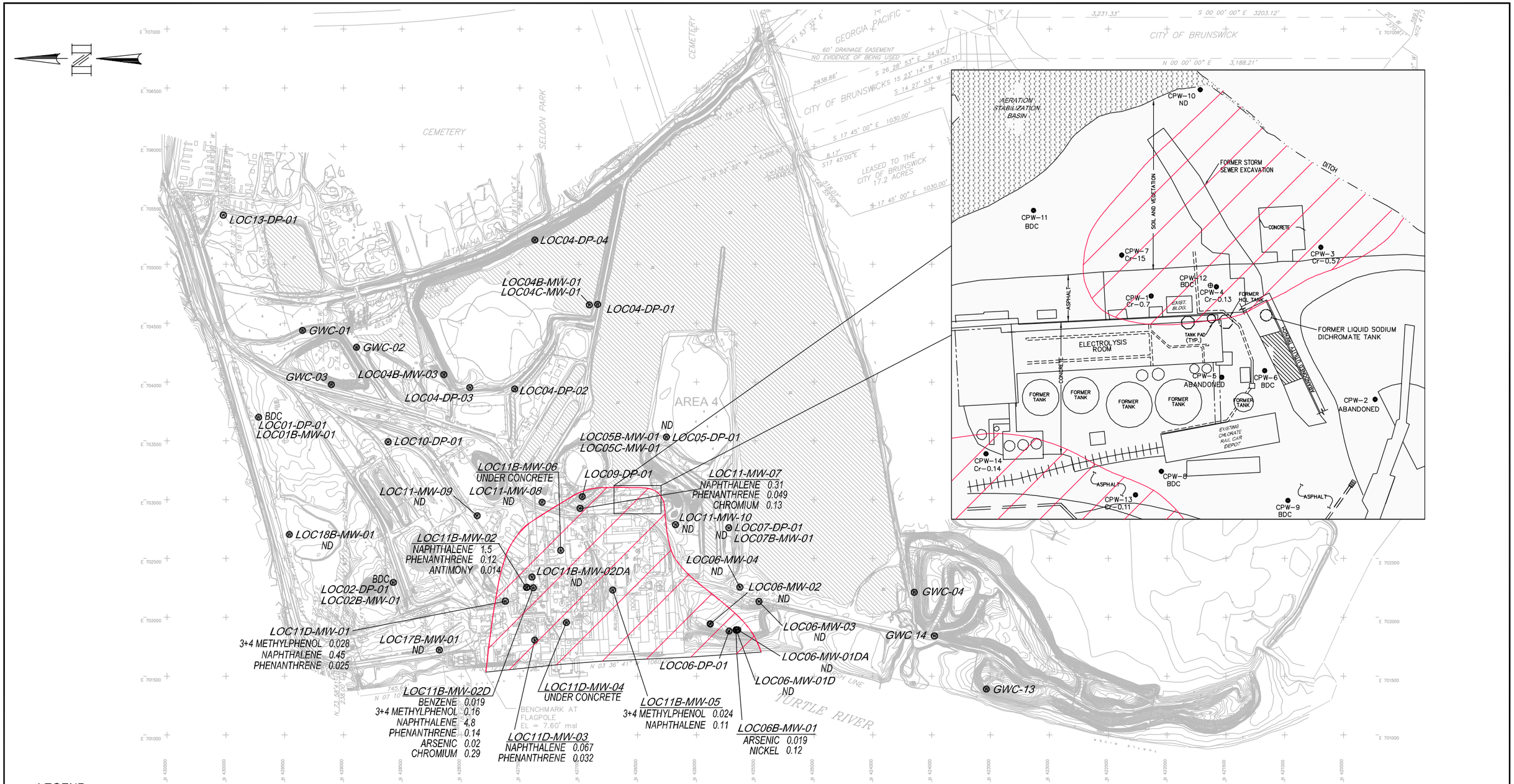
EarthCon Consultants, Inc.

1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062

POTENTIOMETRIC SURFACE MAP
OCTOBER 2013

DRAWN:	CHECKED:	DATE:	FIGURE:
ED	KRR	DEC 2013	1

FILENAME: 02.20060163 - POT MAP - OCT 2013



0' 800' 1600' 2400'

LEGEND:

- ● *MW-01* — *WELL LOCATION*
- ▨ — *AREA ABOVE DELINEATION CRITERIA*
- *BENZENE 0.019* — *CONSTITUENT CONCENTRATION IN MG/L*
- *BDC* — *BELOW DELINEATION CRITERIA*
- *ND* — *NOT DETECTED*

BASE MAP PROVIDED BY: HOLLEY CONSULTANTS DATED: AUG. 1999

BRUNSWICK CELLULOSE, INC.

BRUNSWICK, GEORGIA

PROJECT NO. 02.20060163

EARTHCON®

EarthCon Consultants, Inc.

1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062

SUMMARY OF CONSTITUENTS IN GROUNDWATER ABOVE DELINEATION CRITERIA

DRAWN:	CHECKED:	DATE:	FIGURE:
TM/SBH/ED	KRR	DEC 2013	2

FILENAME: 02.20060163 - GW ABOVE DC FIG2 - FEB 2013

APPENDICES

APPENDIX A

JUSTIFICATION FOR OMITTING LANGUAGE FROM THE ENVIRONMENTAL COVENANT

APPENDIX A

JUSTIFICATION FOR OMITTING LANGUAGE FROM THE ENVIRONMENTAL COVENANT

Items listed in the Activity and/or Use Limitation(s) section of the Environmental Covenant have been modified from the EPD model environmental covenant as follows:

Item #6 Activity and Use Limitation(s): The last two sentences of Item #6 in the model covenant do not appear to fit the facts of BCI/GP's particular situation. The second-to-last sentence of the model covenant states, *"Any activity on the Property that may result in the release or exposure to the regulated substances that were contained as part of the Corrective Action, or create a new exposure pathway, is prohibited."* This prohibition does not fit the facts of BCI/GP's particular situation for the following reasons:

- The facility continues to operate a variety of industrial processes and combustion units on the Property, some of which have the capability of emitting (i.e. releasing) the "regulated substances" covered by the Corrective Action (e.g. lead, mercury, naphthalene). These releases are incidental to ongoing industrial operations and are regulated by a variety of federal and state laws to ensure that any release is protective of public health and the environment. The second-to-last sentence suggests that these otherwise permitted releases are prohibited; however, there is not a sound technical or legal basis to impose such a broad prohibition in this environmental covenant.
- The only exposure pathway that is of concern relates to groundwater and Item #7 ("Groundwater Limitation") of the environmental covenant already limits the groundwater activities. Thus, to the extent the second-to-last sentence could be applicable to the facts of BCI/GP's particular situation, this sentence appears redundant of Item #7.
- The second-to-last sentence suggests that the Corrective Action resulted in regulated substances being "contained" via a cap or some other type of engineered control. The Corrective Action in this case consists of soil reconnaissance and inspection reports and the limitation on groundwater use as set forth in Item #7 of the environmental covenant.

The last sentence of Item #6 in the model covenant states, *"With the exception of work necessary for the maintenance, repair, or replacement of engineering controls, activities that are prohibited <if appropriate – for example, in the capped areas include, but are not limited to the following: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork>."* Again, this sentence does not fit the facts of BCI/GP's particular situation as follows:

- This sentence contemplates some sort of engineering controls as part of the Corrective Action and there are no such controls in this case.
- Second, the Property is in compliance with applicable RRS for soil; thus there is no basis for any activity restrictions as they relate to soil.
- Finally, to the extent the VRP requires a prohibition on any activity at the site, that is limited to the restricted use of surficial groundwater and that activity limitation is spelled out in detail in Item #7 of the environmental covenant.

Item #8 Permanent Markers: Item #8 has been omitted from the Activity and/or Use Limitation(s) section. As evident from the depiction set forth in Exhibit C to the Environmental Covenant, the restricted area is located in the center of BCI/GP's operations at the Property. It is not practical or effective to install markers to delineate restricted area boundaries that transect buildings and other ongoing operations areas, especially when one considers that the entire Property is already fenced and access is restricted to plant personnel and authorized guests.

Item b) under Representations and Warranties: The last two words "and unencumbered" were omitted because several easements do exist over portions of the Property. Thus, the Property is not "unencumbered", as BCI/GP understands that term.

APPENDIX B

SUMMARY OF WELL ABANDONMENT PROCEDURES

APPENDIX B

SUMMARY OF WELL ABANDONMENT ACTIVITIES

Thirty seven (37) monitoring wells were abandoned from October 28 through 31, 2013. A list of the wells abandoned is presented in Table B-1. The wells were abandoned using the following procedures:

- If the well was located in either gravel or a grass area, the well concrete pad and protective cover were first removed, and then the well screen and riser pipe were pulled from the borehole. If the screen and riser pipe could not be removed, then the well was removed by over drilling with augers. The borehole was plugged with a cement grout mixture using a tremie pipe from the bottom of the borehole to the ground surface. The surface was then backfilled with soil or gravel to match the existing ground surface.

- If the well was located in a concrete or asphalt area, the well was abandoned in place using a cement grout mixture using a tremie pipe from the bottom of the well to the ground surface. If the well had a stick-up protective cover, it was removed prior to grouting. The ground surface was finished with concrete to ensure a solid surface completion.

- Wells deeper than 30 feet deep were abandoned in place using a cement grout mixture and completed to match the surrounding area (concrete or gravel).

The well pads and protective covers were removed using a backhoe. The concrete debris and protective covers were placed in the facility's existing recycling area. PVC screen and riser pipe was placed in on-site roll-offs and dumpsters for off-site disposal.

Table B-1: Well Abandonment Details

Well ID	Date Abandoned	Total Well Depth (ft bgs)	Surface Completion	Abandonment Method
Former Chlorate Plant Area				
CPW-1	10/29/13	10	flush manhole	Grout well in place, top with concrete
CPW-2	10/29/13	12	flush manhole	Grout well in place, top with concrete
CPW-3	10/29/13	10	stick-up	Remove 2 bollards & cover; pull screen & riser; grout to surface
CPW-4	10/29/13	10	stick-up	Remove cover; pull screen & riser; grout & top with concrete
CPW-6	10/29/13	10	flush manhole	Grout well in place, top with concrete
CPW-7	10/29/13	12	stick-up	Remove 3 bollards, cover & pad; pull screen & riser; grout to surface
CPW-8	10/29/13	10	flush manhole	Grout well in place, top with concrete
CPW-9	10/29/13	10	flush manhole	Grout well in place, top with concrete
CPW-10	10/29/13	11	stick-up	Remove 2 bollards & cover; pull screen & riser; grout to surface
CPW-11	10/29/13	10.5	stick-up	Remove 3 bollards, cover & pad; pull most of riser; grout screen in place.
CPW-12	10/29/13	40	stick-up	Remove 2 bollards & cover; grout in place, top with concrete
CPW-13	10/29/13	10	flush manhole	Grout well in place, top with concrete
CPW-14	10/30/13	10	stick-up	Remove cover; grout well in place; top with concrete
BCI Mill Facility Wells				
LOC01B-MW-01	10/30/13	13	stick-up	Remove 2 bollards, cover & pad; well damaged; could not locate well bgs to grout
LOC02B-MW-01	10/30/13	20.5	stick-up	Remove 2 bollards, pad & cover; pull screen & riser; grout to surface
LOC05B-MW-01	10/29/13	17	stick-up	Pulled screen & riser; overdrill; grout to surface
LOC05C-MW-01	10/29/13	19	stick-up	Pulled riser & screen; overdrill; grout to surface
LOC06B-MW-01	10/28/13	28	stick-up	Remove pad & cover; overdrill to 28 ft; grout to surface
LOC06-MW-01D	10/28/13	40	flush manhole	Remove 2 bollards, pad & cover; cut riser off 2 ft bgs; grout well in place
LOC06-MW-01DA	10/28/13	98	flush manhole	Remove pad & cover; cut riser off 2 ft bgs; grout well in place
LOC06C-MW-01	10/28/13	28	stick-up	Remove pad & cover; overdrill to 28 ft; grout to surface
LOC06-MW-02	10/29/13	16	flush manhole	Remove pad & cover; overdrill to 16 ft; grout to surface
LOC06-MW-03	10/29/13	15	flush manhole	Remove pad & cover; overdrill to 15 ft; grout to surface
LOC06-MW-04	10/29/13	15	flush manhole	Remove pad & cover; overdrill to 15 ft; grout to surface
LOC07B-MW-01	10/29/13	18	stick-up	Cut riser off 3 ft bgs; grout in place
LOC11D-MW-01	10/30/13	13	flush manhole	Grout well in place, top with concrete
LOC11B-MW-02	10/30/13	15	flush manhole	Grout well in place, top with concrete
LOC11B-MW-02D	10/30/13	35	flush manhole	Grout well in place, top with concrete
LOC11B-MW-02DA	10/30/13	75	flush manhole	Grout well in place, top with concrete
LOC11D-MW-03	10/30/13	13	stick-up	Remove 2 bollards & cover; cut riser off bgs; grout well in place
LOC11B-MW-05	10/30/13	15	flush manhole	Grout well in place, top with concrete
LOC11-MW-07	10/30/13	15	flush manhole	Remove pad & cover; pull riser; overdrill to 15 ft; grout to surface
LOC11-MW-08	10/30/13	16	flush manhole	Grout well in place top with concrete
LOC11-MW-09	10/30/13	15	flush manhole	Remove pad & cover; pull screen & riser; grout to surface
LOC11-MW-10	10/29/13	16	flush manhole	Remove pad & cover; pull screen & riser; grout to surface
Background Wells				
LOC17B-MW-01	10/31/13	13	flush manhole	Remove pad & cover; pull screen & riser; grout to surface; finish with topsoil
LOC18B-MW-01	10/30/13	15	flush manhole	Remove 2 bollards, pad & cover; pull screen & riser; grout to surface