



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

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**Land Protection Branch**

2 Martin Luther King, Jr. Drive  
Suite 1054, East Tower  
Atlanta, Georgia 30334  
404-657-8600

July 12, 2017

**VIA U.S. MAIL AND EMAIL**

BWAY Corporation  
c/o Mr. Steve Bargeron, EHS Manager  
1601 Valdosta Highway  
Homerville, GA 31634

Subject: EPD Comments Regarding:  
Compliance Status Report dated July 11, 2016  
Compliance Certification dated December 14, 2016  
VRP Progress Report 9 dated January 29, 2016  
VRP Progress Report 8 dated July 22, 2015  
Info Submittal in Preparation of the VRP Progress Report 9 dated October 20, 2015  
BWAY Drum Site, HSI No. 10731  
Homerville, Clinch County, Georgia

Dear Mr. Bargeron:

The Georgia Environmental Protection Division (EPD) has reviewed the subject documents that were submitted on your behalf by Environmental Resources Management (ERM) for the referenced site. These documents were submitted in accordance with the Voluntary Remediation Program (VRP) Act and the Rules for Hazardous Site Response (Rules). EPD has the following comments:

1. A VRP Application Form is needed for the Lithographic Plant property (tax parcel 063 041) for this property to be included in the VRP. Please submit this form by August 31, 2017.
2. EPD acknowledges that naphthalene and vinyl chloride do not meet Type 1 – 4 Risk Reduction Standards (RRS) for groundwater and that institutional controls (groundwater use restrictions) will be used to comply with Type 5 RRS.
3. EPD notes that the maximum reported concentration of zinc in soil (288 mg/kg) is less than a conservative Type 2 RRS of 292 mg/kg. The compliance certification may be updated to reflect compliance with soil Type 2 RRS for zinc.

EPD finds the Compliance Status Report to be complete with respect to the VRP Act and the Rules. Once Uniform Environmental Covenants (UECs) have been recorded for the Drum Site property (tax parcel 063-026) and the Lithographic Plant property (tax parcel 063 041) and the Director concurs with the certification of compliance with RRS, this site can be removed from the Hazardous Site Inventory. Draft UECs for these properties are currently under review by EPD and any comments will be provided in a separate correspondence.

BWAY Corporation  
July 12, 2017  
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If you have any questions, please contact Ms. Carolyn L. Daniels, P.G. at (404) 657-8646.

Sincerely,



David Hayes  
Unit Coordinator  
Response and Remediation Program

c: Andreas Shoredits, ERM (via email)  
Jeffrey Bilkert, ERM (via email)  
Bruce Bultman, Aegis Environmental, Inc. (via email)

File: 178-0083 (VRP)

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