Georgia Department of Matural Resources

Environmental Protection Division-Land Protection Branch 2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334 (404) 657-8600; Fax (404) 651-9425 Judson H. Turner, Director

April 2, 2014

Mr. Jay B. Wright Brunswick Cellulose, Inc. 1400 West Ninth Street Brunswick, Georgia 31520 FILE COPY

Mr. James J. Holmes, III Georgia-Pacific Corporation 133 Peachtree Street, N.E. PO Box 105605 (30348-5605) Atlanta, Georgia 30303

Re: Concurrence with Certification and Comments on VRP Updated CSR

Georgia-Pacific LLC - Former Chlorate Plant

Brunswick, Glynn County, Georgia

HSI Site No. 10619

Dear Messrs. Wright and Holmes:

The Georgia Environmental Protection Division (EPD) has reviewed the December 2013 Updated Compliance Status Report (CSR) and the April 2010 Revised Compliance Status Report (CSR), including the December 2010 replacement pages submitted for the Georgia-Pacific, LLC - Former Chlorate Plant, Brunswick Site under EPD's Voluntary Remediation Program (VRP). Based on EPD's review of these documents and information in its files, EPD concurs that the property, Georgia-Pacific, LLC - Former Chlorate Plant, Brunswick site, has been fully delineated for soil and groundwater contamination and corrective action will be complete for this property in accordance with the Risk Reduction Standards (RRS) §391-3-19-.07 of the Rules for Hazardous Site Response (Rules) as documented in the VRP Revised and Updated CSR upon execution of an Environmental Covenant (EC). Therefore, the VRP Updated CSR is hereby approved.

EPD has also determined that all comments from our June 30, 2011 letter have been adequately addressed. Furthermore, EPD agrees that the soil is in compliance with Type 1/2/3 RRS §391-3-19-.07 of the Rules. Therefore, EPD approves the Plan to Maintain Compliance for Groundwater (institutional controls, groundwater monitoring, and groundwater modeling).

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EPD's approval of this document extends only to those technical aspects of the document that expressly require EPD approval under applicable rules and statutes. This approval is not an endorsement by EPD that it accepts as conclusive any representations made in the document. Nor does EPD guarantee or warrant that the document is free of errors or omissions. EPD may later withdraw approval of this document, in whole or in part, if EPD determines that withdrawal is necessary to ensure compliance with the applicable rules and statutes.

In order to remove site from the Hazardous Site Inventory, Georgia Pacific, LLC is required to implement an Environmental Covenant that incorporates the Plan to Maintain Compliance for Soil, restricts groundwater usage on the Georgia Pacific property, and provides for verification of the fate and transport modeling as allowed by O.C.G.A §12-8-107(g)(2) of the VRP Act.

Please provide the proposed Environmental Covenant by May 5, 2014 for EPD's review prior to sending to interested parties and property abutters. If you have any questions regarding this matter, please contact Ms. Jacki Scarbary of the Response and Remediation Program at (404) 657-0489.

Sincerely,

Charles D. Williams

Charles D. Williams

Program Manager

Response and Remediation Program

c: Kristen Ritter Rivera, EarthCon Consultants, Inc.

Encl.: Monitoring Evaluation Form

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