

Georgia Department of Natural Resources

Environmental Protection Division

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334

Judson H. Turner, Director

Land Protection Branch

Keith M Bentley, Branch Chief

December 5, 2012

COPY

VIA E-MAIL AND REGULAR MAIL

Drexel Chemical Company
c/o Mr. Mike Shankle, Technical Director
P.O. Box 13327
1700 Channel Avenue
Memphis, Tennessee 38113

Re: 1st Semi-Annual VIRP Progress Report, October 27, 2011
2nd Semi-Annual VIRP Progress Report, April 26, 2012
Request for Inclusion of CSX Property in the VIRP, August 29, 2012
3rd Semi-Annual VIRP Progress Report, October 23, 2012
SLERA Intake Parameters and Remedial Goals, September 11, 2012
Goldkist Chemical Blending Site, HSI Site No. 10228
120 Cape Road, Cordele, Crisp County
Tax Parcel ID Nos. 040 031, 040 028, CSX Property LL74 and LL87

Dear Mr. Shankle:

The Georgia Environmental Protection Division (EPD) has reviewed the October 2011, April 2012, and October 2012 Progress Reports and the August 2012 Request for Inclusion of CSX Property into the voluntary investigation and remediation program (VIRP) submitted for the above referenced Site pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD also reviewed the revised Screening Level Ecological Risk Assessment (SLERA) Intake Parameters, Food Chain Hazard Quotients and Remedial Goals submitted September 11, 2012. EPD's comments are provided below:

Additional Properties

1. The second semi-annual progress report dated April 26, 2012 requests that additional parcels (Crisp County tax parcel group 040 028) be included in the VIRP. Drexel also requested that portions of the CSX rail line in Crisp County (land lots 74 and 87) be included in the VIRP in letter dated August 29, 2012. EPD hereby accepts these affected properties as qualifying properties under the Act.

Delineation

2. EPD concurs with soil and groundwater delineation of constituents on the Drexel property (040 031) in accordance with Item # 5.b. on the VRP Application checklist. In accordance with the approved VIRP checklist, full horizontal delineation of the release, to Type 1 RRS, should be completed by the next semi-annual report due April 28, 2013 and vertical delineation should be completed by October 28, 2013.

3. EPD accepts the decision to change the location of the monitoring well planned to be completed adjacent to PW-1. The newly selected locations of a deep monitoring well at the railcar unloading area and a horizontal delineation well east of BW-1 are acceptable. However, please describe how Drexel intends to certify compliance of groundwater with RRS for EDB detected in PW-1. Please note that if Drexel cannot certify compliance of groundwater with RRS, then a uniform environmental covenant must be executed limiting groundwater use at the site.

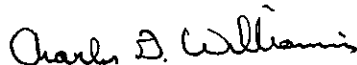
Screening Level Ecological Risk Assessment

4. The revised SLERA intake parameters, food chain hazard quotients and remedial goals submitted to EPD on September 11, 2012 are approved. Please use the lower of the remedial goal and the RRS as the target clean-up concentrations for impacted areas as appropriate.

Drexel must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Drexel. However, failure of EPD to respond to a submittal within any timeframe does not relieve Drexel from complying with the provisions, purposes, standards and policies of the Act.

Please address the above comments in subsequent semi-annual progress reports. EPD anticipates receipt of the next progress report by April 28, 2013 and the Remedial Plan by December 31, 2012. If you have any questions, please contact John Maddox at (404) 657-8600.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Kirk Kessler, P.G., EPS

File: HSI 10228

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