

Richard E. Dunn, Director

Land Protection Branch

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

May 24, 2017

VIA E-MAIL AND REGULAR MAIL

Brunswick Corporation c/o Mr. David Selig 1 North Field Court Lake Forrest, Illinois 60045

Albany Partners, LLC c/o Slavik Enterprises Eric Gold 32500 Telegraph Road, #222 Bingham Farms, Michigan 48025 Albany Sport Co. c/o Amer Sports Americas Ray Berens, Esq. 8750 W. Bryn Mawr Avenue Chicago, Illinois 60631

RE: Voluntary Remediation Program, Interim Final Compliance Status Report, January 26, 2017 MacGregor Golf Site, HSI No. 10398 1601 South Slappey Boulevard, Albany, Dougherty County, Georgia

Tax Parcel ID No. 00212-00001-019

Dear Messrs. Selig, Berens and Gold:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program (VRP) Interim Final Compliance Status Report (CSR), and Uniform Environmental Covenant (UEC), dated January 26, 2017 submitted by Brown and Caldwell on behalf of Brunswick Corporation, Albany Sport Co., and Albany Partners, LLC (the Group) pursuant to the Georgia Voluntary Remediation Program Act (the Act), O.C.G.A. 12-8-100. Based upon EPD's review of this document and available file information, EPD concurs with the following compliance certifications at the above referenced site:

• Tax Parcel ID No. 00212-00001-019 (Former MacGergor Golf Facility) is in compliance with the Type 4 risk reduction standards (RRS) for soil and Type 5 RRS with controls for groundwater upon execution of an environmental covenant.

Therefore, the January 26, 2017 Interim Final CSR is hereby approved subject to the following comments and the execution of the environmental covenant(s):

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EPD has no objections to the options presented in Section 7.1.3.2 regarding the environmental covenant and demonstration of compliance for the adjacent property. Compliance certifications for adjacent property, Tax Parcel ID No. 00212-00001-30E, can be provided in the final CSR to be submitted on or before January 28, 2018.

- 1. Further comments regarding the proposed UEC for the MacGregor property will be provided under separate cover. While the vapor intrusion (VI) pathway for the current use of the property has been addressed through prior assessments, please ensure that appropriate site use limitations are incorporated into the future planned institutional controls to account for any changes to the use of the property that would alter the results of the existing VI assessment and exposure pathway determinations. Please update the annual property evaluation form to include certifications for this exposure pathway.
- 2. The proposed execution of a UEC on the adjacent property (Tax Parcel ID No. 00212-00001-30E) must be completed or an alternate compliance strategy implemented prior to EPD's final concurrence with the VRP CSR compliance certifications.
- 3. Please submit the results of the April 2017 groundwater model validation sampling event as described in Section 8.2 to EPD by July 1, 2017.
- 4. As described in Section 8.3, groundwater wells not selected for annual compliance monitoring can be properly abandoned.
- 5. In future reports, please update Figures 6a, 6b, and 6c to show the delineation and cleanup standards of the applicable regulated substance(s) in the legend.
- 6. The annual inspection and certification form should include a certification for groundwater usage on all adjacent properties. Any groundwater usage that would alter the groundwater model assumptions or indicate potential exposure to impacted groundwater should be reported and appropriately addressed.

The signed environmental covenant should be submitted by no later than July 1, 2017, and according to the schedule included in Table 6 of the referenced CSR the Final VRP CSR will be submitted to be EPD by no later than January 28, 2018. If you have any questions regarding this matter, please contact Mr. John Maddox at (404) 463-0076.

Sincerely,

Jason Metzger Program Manager

Response and Remediation Program

Sarah Jones – Brown and Caldwell (via email)

File: HSI # 10398, ID No. 257-0087

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