



February 24, 2017

VIA EMAIL AND REGULAR MAIL

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

Re: June 2016 Voluntary Remediation Program Compliance Status Report, Monitoring and Maintenance Plan, Uniform Environmental Covenant, and December 2016 1st Annual Progress Report
Drexel Chemical Company, HSI# 10228
120 Cape Road, Cordele, Crisp County
Tax Parcel ID No.(s) 040 031, 040 028 A-J and CSX Property (No Tax Parcel ID No.)

Dear Mr. Shankle:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Remediation Program (VRP) Compliance Status Report (CSR), Monitoring and Maintenance Plan (M&M Plan) and Uniform Environmental Covenant (UEC), dated June 2016 and the First Annual Progress Report, dated December 2016, submitted by Environmental Planning Specialists, Inc., on behalf of Drexel Chemical Company 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 information in its files, EPD concurs with the following compliance certifications at the above referenced site:

- Tax Parcel ID No. 040 031(Drexel Facility) is in compliance with the Type 5 risk reduction standards (RRS) for soil and groundwater upon execution of an environmental covenant;
- Average surface soil concentrations of regulated substances in specified exposure domains of Tax Parcel 040 031 comply with VRP site-specific residential RRS per Section 12-8-108(3) of the VRP Act, and the subsurface soils are in compliance with Type 5 RRS.
- Tax Parcel 040 028 A-J soils meet Type 1 RRS in accordance with the VRP Act;
- The CSX Property, which has no tax parcel ID number, is in compliance with Type 5 RRS for soil.

Therefore, the June 2016 CSR is hereby approved subject to the execution of the environmental covenant(s) and the following comments:

1. According to the "First Annual Report," the concentration of 1,2-dibromoethane in groundwater increased from 0.11 ug/L to 0.40 ug/L at BW-5 during the most recent monitoring event. Considering that concentrations have consistently been above residential risk reduction standards (RRS) and the concentration increased in the most recent monitoring event, EPD

recommends that a streamlined groundwater use restriction environmental covenant be placed on the "Drexel Additional Property" (parcels 040 028 A-J). However, we are amenable to the re-evaluation of compliance by June 2017 as proposed in Section 8 of the CSR.

2. In accordance with Section 12-8-107(e), please provide a revised compliance certification for the CSX property stating that this property is in compliance with Type 5 RRS for groundwater.
3. Please either revise the proposed UEC and associated M&M Plan, modifying the schedule for the operation of the groundwater treatment system until the cleanup criteria for the site are met, or provide a groundwater model and capture zone analysis to justify the proposed discontinuation of the planned groundwater corrective action prior to that time.
4. Section 7.1.3 indicates that "treated water is stored in a 30,000 gallon storage tank for on-demand non-potable use by the facility." While the proposed UEC groundwater use restriction includes verbiage specifically addressing this, the text throughout the CSR is inconsistent and unclear regarding this groundwater use restriction. Please clarify this discrepancy.
5. Please revise the M&M Plan to include a figure that designates the Point of Demonstration (POD) well and Point of Exposure (POE) well, and establish an action criterion for the POD.
6. Further comments regarding the proposed UEC for the Drexel property will be provided to Drexel under separate cover.

The response to the above listed comments and the execution of the environmental covenant should be completed by no later than June 30, 2017. 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

c: Mr. Kirk Kessler and Ms. Timmerly Bullman, EPS, Inc. (via e-mail)

File: HSI # 10228, ID No. 220-0017

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