Voluntary Investigation and Remediation Plan Application Form and Checklist

VRP APPLICANT INFORMATION					
COMPANY NAME	Trademark Metal Recycling, LLC.				
CONTACT PERSON/TITLE	Brenda Anderson/Environmental Manager				
ADDRESS	5220 Dover St. Tampa FL 33606				
PHONE	813-677-4471 x7658	FAX	None	E-MAIL	Brenda.Anderson@tmrecycling.com

GEORGIA CERTIFIED PROFESSIONAL GEOLOGIST OR PROFESSIONAL ENGINEER OVERSEEING CLEANUP					
NAME	Barry Robertson			GA PE/PG NUMBER	PG 831
COMPANY	Stillwater Technologies Inc.				
ADDRESS	203 Hillcrest Street, Orlando, FL 32801				
PHONE	407-206-7222	FAX	407-206-7223	E-MAIL	brobertson@stillwatertech.com

APPLICANT'S CERTIFICATION

In order to be considered a qualifying property for the VRP:

(1) The property must have a release of regulated substances into the environment;
(2) The property shall not be:
- (A) Listed on the federal National Priorities List pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. Section 9601.
- (B) Currently undergoing response activities required by an order of the regional administrator of the federal Environmental Protection Agency; or
- (C) A facility required to have a permit under Code Section 12-8-66.

(3) Qualifying the property under this part would not violate the terms and conditions under which the division operates and administers remedial programs by delegation or similar authorization from the United States Environmental Protection Agency.
(4) Any lien filed under subsection (e) of Code Section 12-8-96 or subsection (b) of Code Section 12-13-12 against the property shall be satisfied or settled and released by the director pursuant to Code Section 12-8-94 or Code Section 12-13-6.

In order to be considered a participant under the VRP:
- (1) The participant must be the property owner of the voluntary remediation property or have express permission to enter another's property to perform corrective action.
- (2) The participant must not be in violation of any order, judgment, statute, rule, or regulation subject to the enforcement authority of the director.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

I also certify that this property is eligible for the Voluntary Remediation Program (VRP) as defined in Code Section 12-8-105 and I am eligible as a participant as defined in Code Section 12-8-106.

APPLICANT'S SIGNATURE	Brenda Anderson		
APPLICANT'S NAME/TITLE (PRINT)	Brenda Anderson, Environmental Mgr.	DATE	3/8/13

QUALIFYING PROPERTY INFORMATION (For additional qualifying properties, please refer to the last page of application form)				
HAZARDOUS SITE INVENTORY INFORMATION (if applicable)				
HSI Number	10923	Date HSI Site listed	September 2012	
HSI Facility Name	Rice Iron and Metals, Inc. (Former)	NAICS CODE		
PROPERTY INFORMATION				
TAX PARCEL ID	0121A 026	PROPERTY SIZE (ACRES)	27.57	
PROPERTY ADDRESS	2000 West Savannah Avenue			
CITY	Valdosta	COUNTY	Lowndes	
STATE	GA	ZIPCODE	31603	
LATITUDE (decimal format)	30.818889	LONGITUDE (decimal format)	83.305	
PROPERTY OWNER INFORMATION				
PROPERTY OWNER(S)	Trademark Metals Recycling LLC	PHONE #	813-677-4471	
MAILING ADDRESS	PO Box 672			
CITY	Valdosta	STATE/ZIPCODE	GA / 31603	

ITEM #	DESCRIPTION OF REQUIREMENT	Location in VRP (i.e. pg., Table #, Figure #, etc.)	For EPD Comment Only (Leave Blank)
1.	**$5,000 APPLICATION FEE** IN THE FORM OF A CHECK PAYABLE TO THE GEORGIA DEPARTMENT OF NATURAL RESOURCES. (PLEASE LIST CHECK DATE AND CHECK NUMBER IN COLUMN TITLED "LOCATION IN VRP." PLEASE DO NOT INCLUDE A SCANNED COPY OF CHECK IN ELECTRONIC COPY OF APPLICATION.)	**Appendix B**	
2.	**WARRANTY DEED(S)** FOR QUALIFYING PROPERTY.	**Appendix C**	
3.	**TAX PLAT** OR OTHER FIGURE INCLUDING QUALIFYING PROPERTY BOUNDARIES, ABUTTING PROPERTIES, AND TAX PARCEL IDENTIFICATION NUMBER(S).	**Appendix C**	
4.	**ONE (1) PAPER COPY AND TWO (2) COMPACT DISC (CD) COPIES** OF THE VOLUNTARY REMEDIATION PLAN IN A SEARCHABLE PORTABLE DOCUMENT FORMAT (PDF).	√	
5.	The VRP participant's initial plan and application must include, using all reasonably available current information to the extent known at the time of application, a graphic three-dimensional preliminary conceptual site model (CSM) including a preliminary remediation plan with a table of delineation standards, brief supporting text, charts, and figures (no more than 10 pages, total) that illustrates the site's surface and subsurface setting, the known or suspected source(s) of contamination, how contamination might move within the environment, the potential human health and ecological receptors, and the complete or incomplete exposure pathways that may exist at the site; the preliminary CSM must be updated as the investigation and remediation progresses and an up-to-date CSM must be included in each semi-annual status report submitted to the director by the participant; a **PROJECTED MILESTONE SCHEDULE** for investigation and remediation of the site, and after enrollment as a participant, must update the schedule in each semi-annual status report to the director describing implementation of the plan	**Attached Report with Figures, Tables, and Appendix**	

	during the preceding period. A Gantt chart format is preferred for the milestone schedule. The following four (4) generic milestones are required in all initial plans with the results reported in the participant's next applicable semi-annual reports to the director. The director may extend the time for or waive these or other milestones in the participant's plan where the director determines, based on a showing by the participant, that a longer time period is reasonably necessary:		
5.a.	Within the first 12 months after enrollment, the participant must complete horizontal delineation of the release and associated constituents of concern on property where access is available at the time of enrollment;	**Appendix A**	
5.b.	Within the first 24 months after enrollment, the participant must complete horizontal delineation of the release and associated constituents of concern extending onto property for which access was not available at the time of enrollment;	**Appendix A**	
5.c.	Within 30 months after enrollment, the participant must update the site CSM to include vertical delineation, finalize the remediation plan and provide a preliminary cost estimate for implementation of remediation and associated continuing actions; and	**Appendix A**	
5.d.	Within 60 months after enrollment, the participant must submit the compliance status report required under the VRP, including the requisite certifications.	**Appendix A**	
6.	**SIGNED AND SEALED PE/PG CERTIFICATION** AND SUPPORTING DOCUMENTATION: "I certify under penalty of law that this report and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, et seq.). I am a professional engineer/professional geologist who is registered with the Georgia State Board of Registration for Professional Engineers and Land Surveyors/Georgia State Board of Registration for Professional Geologists and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances. Furthermore, to document my direct oversight of the Voluntary Remediation Plan development, implementation of corrective action, and long term monitoring, I have attached a monthly summary of hours invoiced and description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." BARRY D. ROBERTSON PG 831 Printed Name and GA PE/PG Number 3. 8. 2013 Date Barry D Robertson Signature and Stamp		

Stillwater Technologies, Inc.

Stillwater
Technologies,
Inc.

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Orlando,
Florida
32801

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Voluntary Remediation Plan and Application

Trademark Metals Recycling
2000 West Savannah Avenue
Valdosta, Georgia 31603

Prepared for:

Trademark Metals Recycling, LLC.
400 Ashley Drive, Suite 1300
Tampa, FL 33605

For Submittal to:

Georgia Department of Natural Resources
Environmental Protection Division
Hazardous Waste Management Branch
2 Martin Luther King Jr. Drive, SE
Suite 1462
Atlanta Georgia 30334-9000

Stillwater Project No. 216-033

March 7, 2013

March 7, 2013

216-033

Ms. Carolyn L. Daniels, P.G.
Georgia Department of Natural Resources
Environmental Protection Division
Land Protection Branch
Response and Remediation Program
2 Martin Luther King, Jr. Drive, SE
Suite 1462, East Town
Atlanta, Georgia 30334-9000

Ref: Voluntary Remediation Plan and Application
Trademark Metals Recycling
2000 West Savannah Avenue
Valdosta, GA 31603

Dear Ms. Daniels:

On behalf of Trademark Metals Recycling (TMR), Stillwater Technologies Inc. is pleased to submit this Voluntary Remediation Plan, completed application form and attached $5,000.00 application fee to enroll the above referenced site in the Georgia Voluntary Remediation Program. We look forward to working with you on this project.

As always, if you have any questions or need additional information, please feel free to give me a call at (407) 206-7222.

Sincerely,
STILLWATER TECHNOLOGIES, INC.

Nam Phu
Project Scientist

Barry D. Robertson, P.G, GA. #831
Principal

Attachment

TABLE OF CONTENTS

Section 1.0
Introduction

This Voluntary Remediation Program (VRP) Application has been prepared for the Trademark Metals Recycling (TMR) facility located at 2000 West Savannah Avenue, Valdosta, Georgia. The site totals approximately 28 acres and is somewhat square in shape with approximately 1,000 feet of frontage along West Savannah Avenue. A pond is present on the eastern half of the site. The vicinity is rural in nature with other commercial businesses and residential properties in the surrounding area. A Site Location Map is included as **Figure 1**.

The site is accessed via West Savannah Avenue, which borders the property to the north. Structures and improvements present onsite include:

- An office building containing approximately 1,630 square feet and constructed with concrete block walls on a concrete slab foundation and an asphalt shingle roof.
- A warehouse building comprising of approximately 20,000 square feet and constructed on an elevated concrete slab with a steel frame structure, galvanized metal walls and roof.
- A one-story concrete block structure, encompassing approximately 500 square feet, located in the southern portion of the site. The building formerly housed components of a shear, and is currently used for storage.
- A truck scale
- A rail spur
- A chain link fence and locking gate along West Savannah Avenue
- A storage tank area with a concrete, covered containment
- At the time of the acquisition, the facility operated a baler and a shear. As a result of the environmental due diligence the baler and shear were identified as potential environmental liabilities and therefore were removed.

A Site Map is included as **Figure 2**.

The site has been operating as a metal recycling facility since the 1960s and was agricultural prior to development. The site was owned and operated by Rice Iron & Metal, Inc prior to the purchase by TMR in 2011. During the purchasing process, TMR conducted environmental due diligence by installing a total of 11 monitoring wells to evaluate the site groundwater quality. The groundwater samples indicated that several regulated substances were detected which

exceeded the Media Target Concentration (MTC) as outlined in Appendix III of Chapter 391-3-19 of the Georgia Hazardous Site Response Act, Official Code Georgia Annotated (OCGA). The regulated substances included arsenic, benzene, trichloroethylene, tetrachloroethylene, and vinyl chloride.

1.1 Eligibility

The site meets the eligibility requirements of Georgia VRP Code Section 12-8-105. The site submitted a Release notification/Reporting Form on November 8, 2011 and the site was listed by EPD in September 2012 on the Hazardous Site Inventory (HSI) as site #10923. Listed below are the eligibility criteria:

1. The site has a release of regulated substances in the environment;
2. The site is not listed on the National Priorities List;
3. The site is not currently undergoing response activities required by an order of the regional administrator of the federal Environmental Protection Agency (EPA);
4. The site does not require a permit under Code Section 12-8-66;
5. Qualifying the site would not violate the terms and conditions under which the division operates and administers remedial program by delegation or similar authorization from the United States EPA; and
6. The site does not have any outstanding liens pursuant to OCGA 12-8-96(e) or 12-13-12(b).

1.2 Previous Investigations

Stillwater performed a limited site investigation on October 2011 during TMR's environmental due diligence period. The site investigation consisted of the installation of 11 monitoring wells and subsequent groundwater and soil sampling. The wells were placed in areas that were perceived to have the greatest risk for environmental impacts. Areas included the former shear building, former baler area, the tank containment structure, oil water separator discharge point, and on the north and west boundaries of the property. The results from the groundwater samples indicated that two of the monitoring wells (MW-5 and MW-9) had reported benzene concentrations exceeding Georgia's MTCs and one of the monitoring wells (MW-1) had reported arsenic, vinyl chloride, benzene, TCE and PCE concentrations exceeding Georgia's MTCs.

The soil samples were collected from the former baler area, oil/water separator discharge point, motor block storage area, and rail car load-out area. The results from the soil samples were below the notification levels outlined in Georgia's MTCs. Soil sample locations are illustrated in **Figure 3**.

1.3 Hydrogeology

The geology in the vicinity of the site consists of Pliocene age sediments ranging in thickness from 20-90 feet. These sediments have a shallow surface increment of fine sand to coarse sand overlying sandy clay. The sandy clay is limonitic and mottled and contains finely disseminated phosphate grains. Underlying the Pliocene sediments is the Hawthorn Formation of middle Miocene age. The Hawthorn averages 150 feet in thickness, is phosphatic, and is pale green to dark green. It is a sandy clay interbedded with fine sand to coarse sand and sandy limestone. Underlying the Hawthorn Formation is the Tampa Formation of early Miocene age. The Tampa Formation is a white or cream colored limestone, sandy and phosphatic, locally cherty, and slightly fossiliferous. Karst topography dominates the landscape over much of the county, the result of groundwater solution cavities in the underlying limestone.

A lithology boring to a depth of 20 feet was completed at the site. The boring consisted of silty sands near the ground surface, transitioning to clayey sands and back to silty sands with depth. Rock was not encountered during the boring. A geologic cross section is included as **Figure 4.**

Groundwater in the area is encountered in the shallow sands and in the deeper underlying limestone, which produces artesian conditions in some wells. Shallow wells are commonly 30-60 feet deep and yield sufficient water for home use except during extreme drought conditions. Deep wells range from 120-150 feet deep in the southern part of the county and from 260-280 feet deep in the northern part. The deep wells provide abundant water for most towns in the county. (USDA Soil Conservation Service. Soil Survey of Lowndes County, Georgia 1975)

Groundwater levels were collected from the 11 monitoring wells during the limited site assessment activities. The top of casing of several monitoring wells were surveyed relative to an on-site benchmark. A groundwater flow map based on the collected data is included as **Figure 3.** Based on the water level data, groundwater flow at the site is interpreted to be south southwest.

1.4 Groundwater Impacts

Groundwater samples were collected from permanent monitoring wells MW-1 through MW-11 in October 2011. The results from the sampling event are summarized in **Table 1**. Results of the groundwater sample analysis from monitoring well MW-1 had reported arsenic at a concentration of 0.0138 mg/L (MTCs 0.01), vinyl chloride of 0.0023 mg/L (MTCs 0.002), benzene of 0.0052 mg/L (MTCs 0.005), TCE of 0.130 mg/L (MTCs 0.005) and PCE of 0.059 mg/L (MTCs 0.005). In addition, the sample results from monitoring well MW-5 yielded benzene at a concentration of 0.034 mg/L (MTCs 0.005), and MW-9 yielded benzene at a concentration of 0.0098 mg/L (MTCs 0.005). The results of the groundwater sample analysis did not report analyzed constituents at concentrations above the Georgia MTCs in the remaining of the wells sampled. A monitoring well location map is included as **Figure 5**.

A groundwater concentration map and a hydrogeological cross-section map with groundwater concentrations are included as **Figures 4** and **5**. These figures provide a concept as to potential sources on the site. The potential sources will be discussed in the following section.

Section 2.0
Preliminary Conceptual Site Model

2.1 Site Model

The Conceptual Site Model (CSM) is a graphic representation that is developed based on the results from the previous assessment activities. Within the CSM are the site's geology, hydrogeology, and subsurface geochemical conditions. The resulting information was considered in order to evaluate how the contamination might move and the possible exposure pathways that may exist at the site. Site geology and hydrogeology were addressed in Section 1.3. The CSM representation is included as **Figure 6 and 7**.

2.2 Areas of Concern

Two areas of concern at the site were identified during the due diligence period based on the potential for release. The first area entails the former baler operation. The baler operation area contained the hydraulic baler machine and served as a storage area for hydraulic oil and petroleum products (oils/grease). The hydraulic baler machine was covered by a shed and was located in a concrete containment structure that extended approximately 6 feet deep. Two monitoring wells were installed around the baler area. Monitoring well MW-1 is located east and MW-2 is located south of the area. Monitoring well MW-1 exhibited concentrations of arsenic (0.0138 mg/L), vinyl chloride (0.0023 mg/L), benzene (0.0052 mg/L) , TCE (0.130 mg/L) and PCE (0.059 mg/L). Monitoring well MW-2 did not exhibit concentrations above Georgia's MTCs for the tested constituents.

The second area of concern was the former shear area located on the southwest portion of the site. The former shear building was a concrete structure which housed an electric, hydraulic shear machine. Monitoring wells MW-5, MW-6, MW-7, and MW-9 were installed in this area. Only monitoring wells MW-5 (0.034 mg/L) and MW-9 (0.0098 mg/L) had reported benzene concentrations above Georgia's MTCs.

2.3 Contamination Fate and Transport

The fate and transport of the dissolved chlorinated solvents in groundwater will be evaluated using the U.S. Environmental Protection Agency (EPA) BIOCHLOR groundwater modeling software. BIOCHLOR is a screening model that simulates remediation by natural attenuation of dissolved solvents at chlorinated solvent release sites. BIOCHLOR includes three different model types:

- Solute transport without decay
- Solute transport with biotransformation modeled as a sequential first-order decay process
- Solute transport with biotransformation modeled as a sequential first-order decay process with two different reaction zones (i.e., each zone has a different set of rate coefficient values)

The software has the ability to simulate one-dimensional advection, three-dimensional dispersion, linear adsorption, and biotransformation via reductive dechlorination (the dominant biotransformation process at most chlorinated solvent sites). Reductive dechlorination is assumed to occur under anaerobic conditions and dissolved solvent degradation is assumed to follow a sequential first-order decay process. Using known and assumed input data, Stillwater will model the transport and potential decay of the dissolved solvent plume to predict future impacts at known distances downgradient from the source area.

2.4 Potential Receptors and Exposure Pathways

The land use of the site and surrounding areas is mostly rural commercial/industrial with the exception to the east. The area east of the site is residential. Point of Determination (POD) wells were installed on the north and west edges of the property (MW-10, MW-11) to monitor groundwater migration to Point of Exposure properties. POD wells to the east and south will be installed in the future. Migration activities will also be evaluated with groundwater concentration trending analysis.

Potential human receptors are onsite personnel, customers, potable and non potable well water supplies. They are addressed below:

- Soil samples collected at the site confirm that no contamination has been identified. Therefore, potential exposure to impacted soils does not exist.

- Groundwater on the site was encountered approximately 13 feet below land surface during the assessment period. Results of the groundwater sample analysis indicated the presence of arsenic, benzene, TCE, PCE, and vinyl chloride above Georgia's MTCs. Vertically, the impact has not been delineated but will be addressed. Due to the depth of groundwater, incidental ingestion or dermal contact is not expected.

A flow chart of the potential receptors and exposure pathways is also included on the CSM **Figure 6 and 7**.

Section 3.0
Preliminary Remedial Action

3.1 Remediation Plan

Stillwater has developed a remediation plan as part of the VRP application. Listed below is a summary of the tasks:

- Install 4 Lithologic Borings across the site to aid in the complete development of the CSM;
- Install monitoring wells to delineate the vertical and horizontal groundwater impacts in the vicinity of the former baler and former shear areas (proposed monitoring well locations illustrated on **Figure 8**);
- Install POD monitoring wells to the east and south;
- Perform a well survey;
- Perform semi-annual groundwater sampling events; and
- Conduct groundwater modeling using the EPA BIOCHLOR software;

If contamination is found to be offsite, then within 24 months additional delineation will take place. The site's CSM will be updated with each sampling event. After the delineation is complete and the CSM is updated, a compliance status report will be submitted within 60 months. A Gantt chart outlining the remediation plan and milestone schedule is included in **Appendix A.**

Tables

Stillwater Technologies, Inc.

Voluntary Investigation and Remediation Plan Application

TMR-Valdosta
Valdosta, GA.

Stillwater Project No. 216-033

March 7, 2013

TABLE 1: GROUNDWATER ANALYTICAL SUMMARY

Facility Name: TMR-Valdosta

Sample		Metals by 6010		
Location	Date	Arsenic	Chromium	Lead
MW-1	10/7/2011	**0.0138**	**0.00166I**	0.00120U
MW-2	10/7/2011	0.00420U	**0.000306I**	0.00120U
MW-3	10/6/2011	0.00420U	**0.00158I**	0.00232I
MW-4	10/6/2011	0.00420U	**0.000569I**	0.00120U
MW-5	10/6/2011	0.00420U	**0.00472I**	0.00120U
MW-6	10/6/2011	0.00420U	**0.00108I**	0.00120U
MW-7	10/7/2011	0.00420U	**0.00410I**	0.00120U
MW-8	10/6/2011	0.00420U	**0.00350I**	0.00120U
MW-9	10/6/2011	0.00420U	**0.00123I**	0.00120U
MW-10	10/7/2011	0.00420U	**0.00348I**	0.00318I
MW-11	10/7/2011	0.00420U	**0.00153I**	0.00120U
Appendix III MTCS		0.010	0.1	0.015

Sample		Volatiles/Semi Volatiles by EPA Method 8260 B/8270 C														
Location	Date	Vinyl Chloride	MTBE	Cis-1,2-Di chloroethene	Benzene	TCE	PCE	Ethyl benzene	Toluene	Xylenes	Chloro-benzene	Isopropyl benzene	n-Propyl benzene	1,3,5-Trimethyl benzene	1,2,4 -Trimethyl benzene	Naphthalene
MW-1	10/7/2011	**0.0023**	0.001U	**0.950**	**0.0052**	**0.130**	**0.059**	**0.018**	**0.001**	**0.206**	**0.0007I**	0.0005U	0.0004U	0.0008I	0.00014	**0.0042**
MW-5	10/6/2011	0.0002U	**0.690**	0.0005I	**0.034**	0.0002U	0.0002U	0.0012	0.0005I	0.0007I	**0.0004I**	0.0005U	0.0004U	0.0005U	0.0005U	0.002U
MW-9	10/6/2011	0.0002U	**0.170**	0.002U	**0.0098**	0.0002U	0.0002U	0.0005U	0.0005U	0.0005U	0.0002U	0.0005U	0.0004U	0.0005U	0.0005U	0.002U
MW-10	10/7/2011	0.0002U	0.0001U	0.002U	0.005U	0.0002U	0.0002U	0.0005U	0.0005U	0.0005U	0.0002U	0.0005U	0.0004U	0.0005U	0.0005U	0.002U
MW-11	10/7/2011	0.0002U	0.0002U	0.002U	0.005U	0.0002U	0.0002U	0.0005U	0.0005U	0.0005U	0.0002U	0.0005U	0.0004U	0.0005U	0.0005U	0.002U
Appendix III MTCS		0.002			0.005	0.005	0.005	7	1	10	0.1					0.02

MTCS = Media Target Concentrations and Standard Exposure Assumptions

0.300	Above lab detection limits
23.80	Exceeds MTCS

Blank = Not Regulated

I=Indicates Reported value is between laboratory method detection limit and the laboratory practical quantitational method

Results in millogram per Liter

U=Indicates the compound was analyzed for, but not detected

TABLE 2: SOIL ANALYTICAL SUMMARY

Facility Name: TMR Valdosta

				Metals			
Boring No.	Date Collected	Sample Depth (fbls)	PCBs	Arsenic	Cadmium	Chromium	Lead
Area 3 CSS-1	10/6/2011	3'	0.0140I	0.378U	1.01	1.11V	1.72
Area 4 CSS-2	10/6/2011	4'	0.00540U	0.346U	0.648IV	0.453I	
Area 5 CSS-4	10/6/2011	2'		4.74		1.44V	0.643
Appendix I - RSSC			1.55	41	39	1200	400

				VOCs																	
Boring No.	Date Collected	Sample Depth (fbls)	Vinyl Chloride	Trichloro-fluoromethane	Methylene Chloride	CIS-1,2-Di chloroethene	Benzene	TCE	PCE	Ethyl benzene	Toluene	Xylenes	Styrene	Isopropyl benzene	n-Propyl benzene	1,3,5-Trimethyl benzene	1,2,4 -Trimethyl benzene	p-Isopropyl benzene	1,2-Dichloro benzene	Naphthalene
Area 6-CSS-3	10/6/2011	12'	0.0010U	0.0010U	0.025U	0.0060	0.0010U	0.001I	0.0010U	0.0012I	0.0010U	0.0010I	0.0010U	0.0010U	0.0010U	0.0010U	0.0010U	0.0010U	0.0010U	0.0050U
Appendix I - RSSC			0.04	0.7	0.08		0.02	0.13	0.18	20	14.40	20	14	21.88				21.88	25	100

RSSC = Regulated Substance and Soil Concentrations that trigger notification

0.035	Above lab detection limits
23.80	Exceeds RSSC

Blank = Not Regulated

I=Indicates Reported value is between laboratory method detection limit and the laboratory practical quantitational method

Results in milligram per Kilogram

U=Indicates the compound was analyzed for, but not detected

Figures

Stillwater Technologies, Inc.

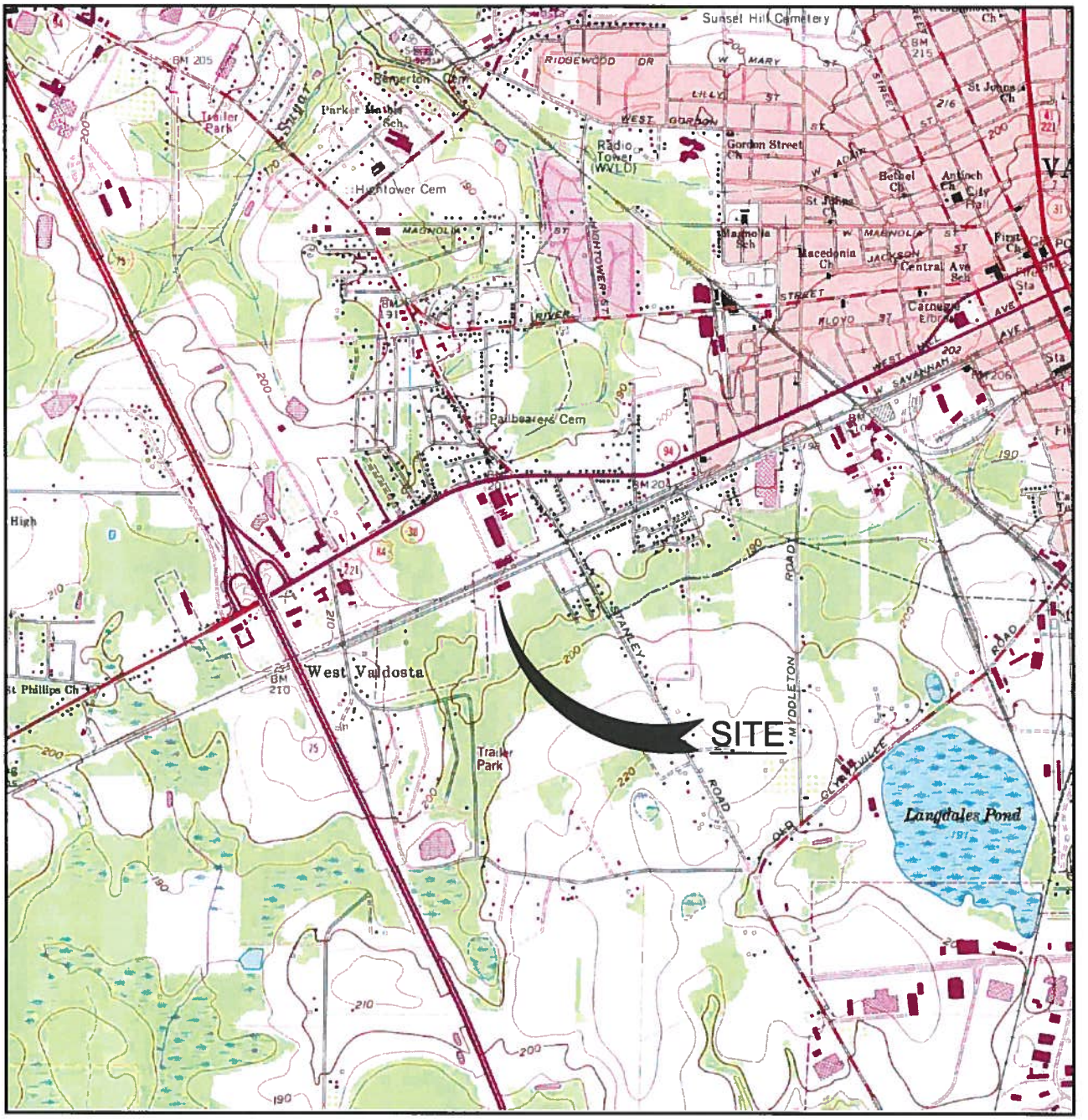
Voluntary Investigation and Remediation Plan Application

TMR-Valdosta
Valdosta, GA.

Stillwater Project No. 216-033

March 7, 2013

Historical Topographic Map



DRAWN:	SML
APPROVED:	BDR
DATE:	01/30/13
SCALE:	N.T.S.

Site Location Map

TMR Valdosta

2000 West Savannah Avenue
Valdosta, Lowndes County, GA
Stillwater Project #216-033

stillwater
TECHNOLOGIES
203 Hillcrest Street
Orlando, Florida 32801
(407) 206-7222
(407) 206-7223 fax

FIGURE
1

J:\216 The David J. Joseph Company\216-033 TMR Valdosta\Figures\216033 TMR Valdosta Figures_rev2013-02-15.dwg

DRAWN:	SML
APPROVED:	BDR
DATE:	01/30/13
SCALE:	N.T.S.

Site Map
TMR Valdosta

2000 West Savannah Avenue
Valdosta, Lowndes County, GA
Stillwater Job #216-033

stillwater TECHNOLOGIES

203 Hillcrest Street
Orlando, Florida 32801
(407) 206-7222
(407) 206-7223 fax

FIGURE
2

J:\216 The David J. Joseph Company\216-033 TMR Valdosta\Figures\216033 TMR Valdosta Figures_rev2013-02-15.dwg

DRAWN:	SML
APPROVED:	BDR
DATE:	01/30/13
SCALE:	AS NOTED

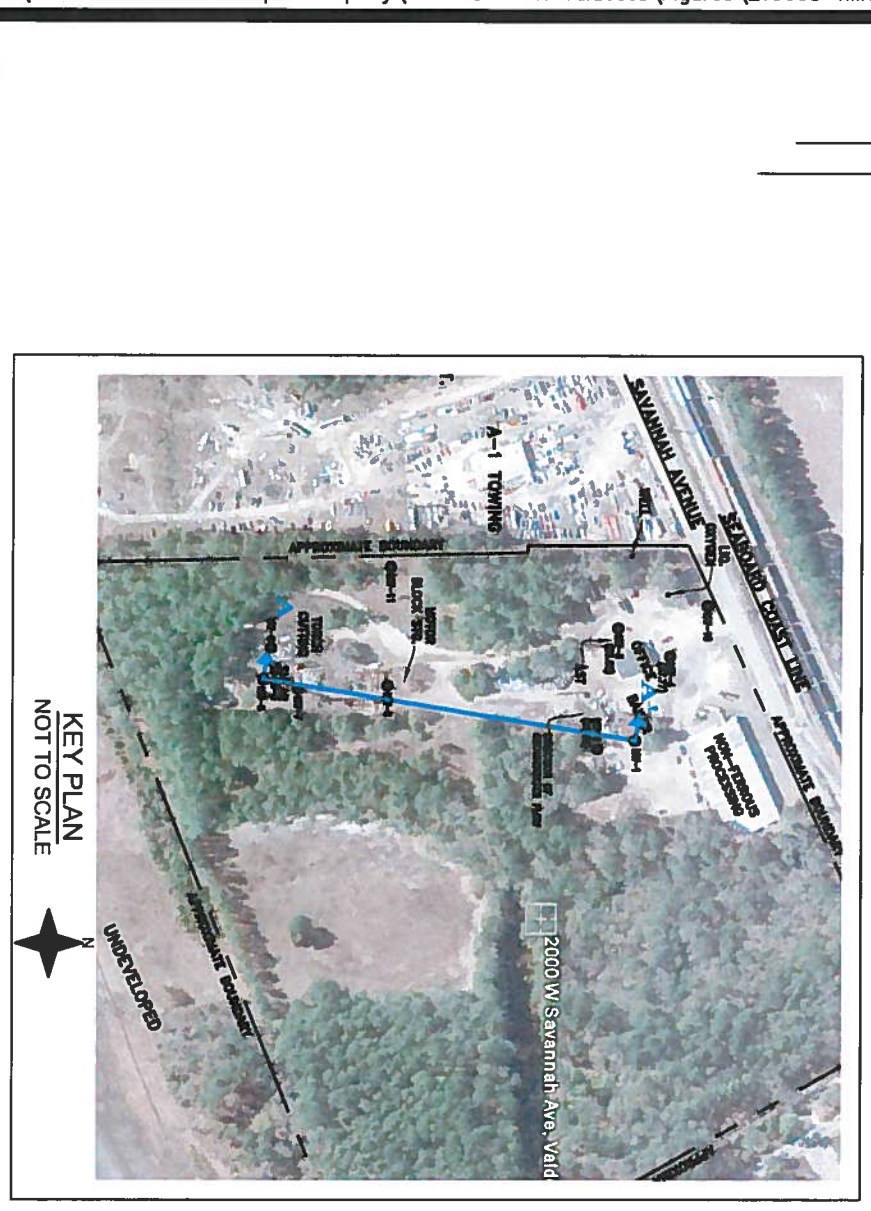
Groundwater Flow Map
TMR Valdosta

2000 West Savannah Avenue
Valdosta, Lowndes County, GA
Stillwater Job #216-033

stillwater TECHNOLOGIES
203 Hillcrest Street
Orlando, Florida 32801
(407) 206-7222
(407) 206-7223 fax

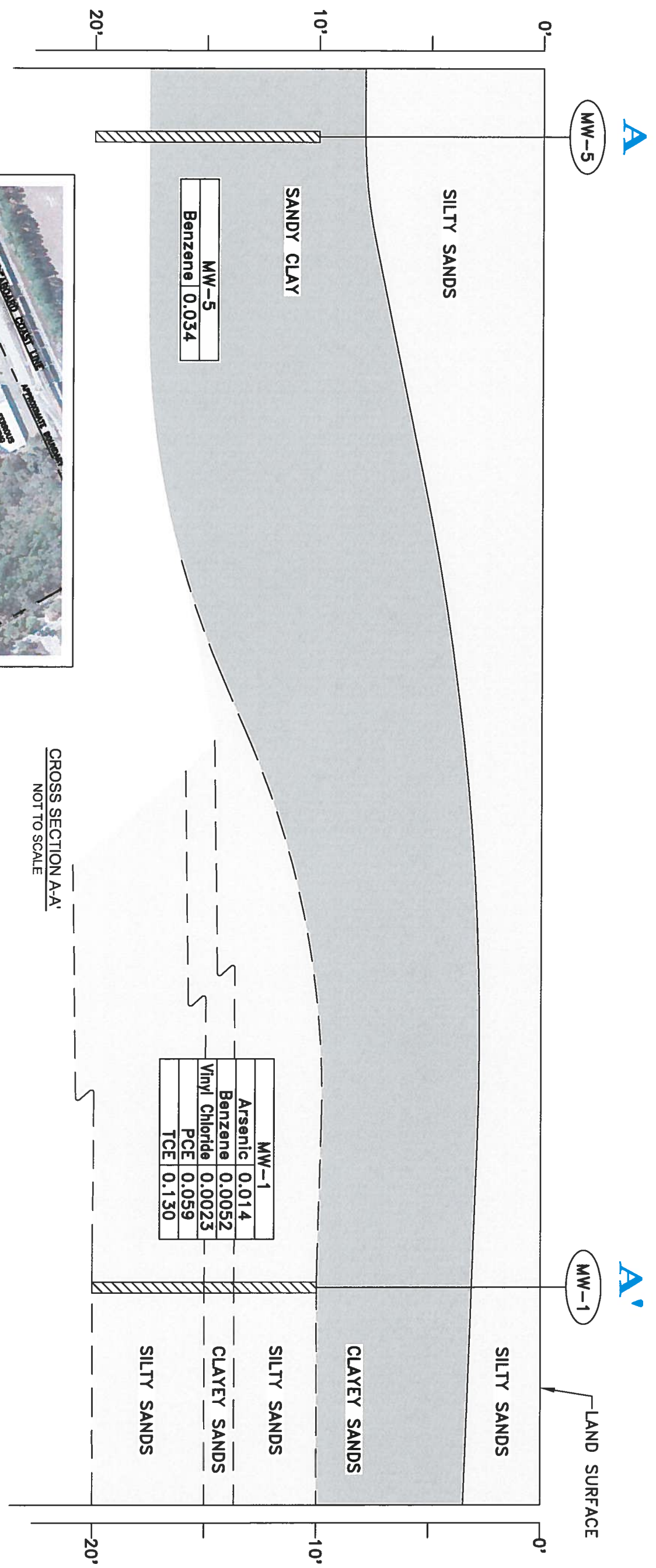
FIGURE
3

J:\216 The David J. Joseph Company\216-033 TMR Valdosta\Figures\216033 TMR Valdosta Figures_rev2013-02-15.dwg



KEY PLAN
NOT TO SCALE

CROSS SECTION A-A'
NOT TO SCALE



DRAWN:	SML
APPROVED:	BDR
DATE:	01/30/13
SCALE:	N.T.S.

Geologic Cross Section
TMR Valdosta

2000 West Savannah Avenue
Valdosta, Lowndes County, GA
Stillwater Job #216-033

stillwater TECHNOLOGIES
203 Hillcrest Street
Orlando, Florida 32801
(407) 206-7222
(407) 206-7223 fax

FIGURE
4

J:\216 The David J. Joseph Company\216-033 TMR Valdosta\Figures\216033 TMR Valdosta Figures_rev2013-02-15.dwg

DRAWN:	SML
APPROVED:	BDR
DATE:	01/30/13
SCALE:	AS NOTED

Monitor Well Locations & Groundwater Concentration Map

TMR Valdosta

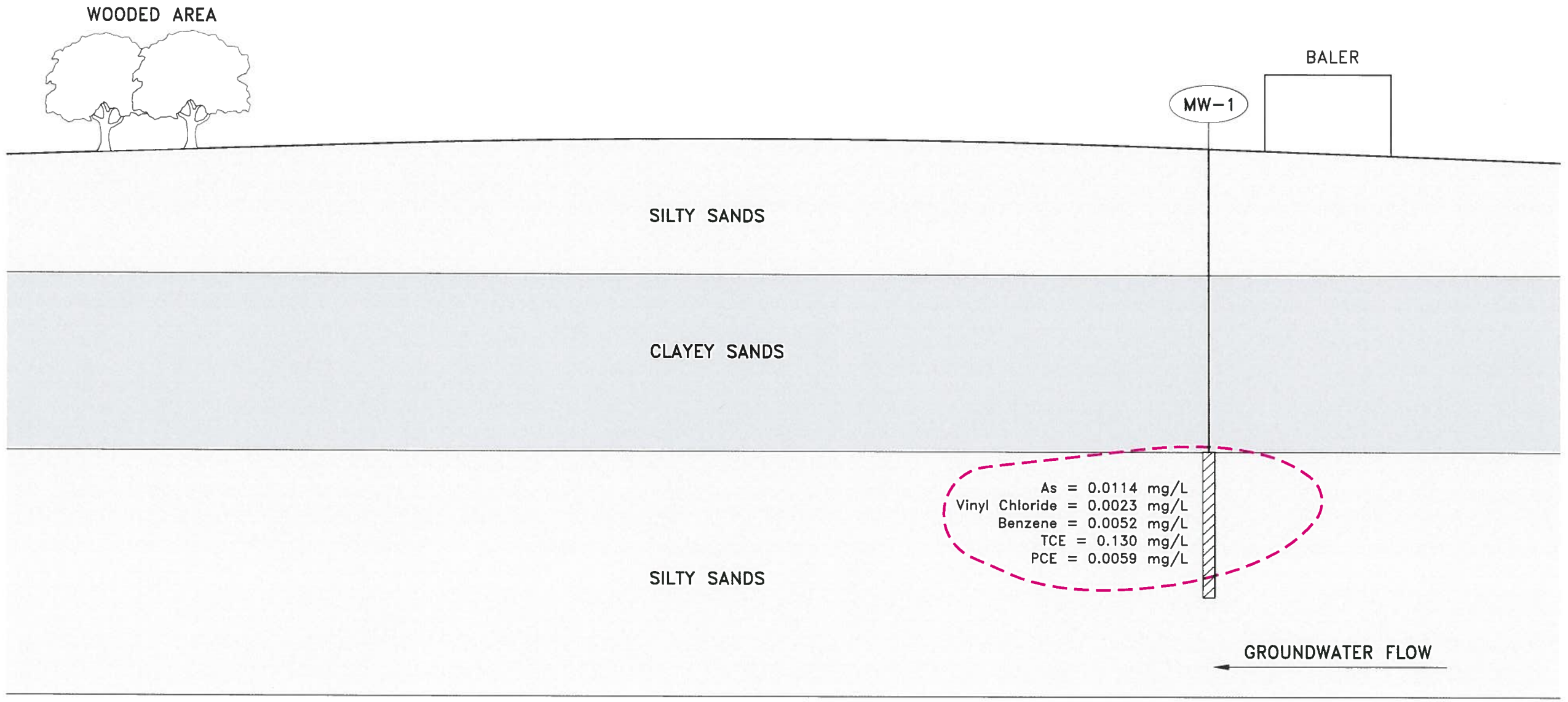
2000 West Savannah Avenue
Valdosta, Lowndes County, GA
Stillwater Job #216-033

stillwater TECHNOLOGIES

203 Hillcrest Street
Orlando, Florida 32801
(407) 206-7222
(407) 206-7223 fax

FIGURE

5



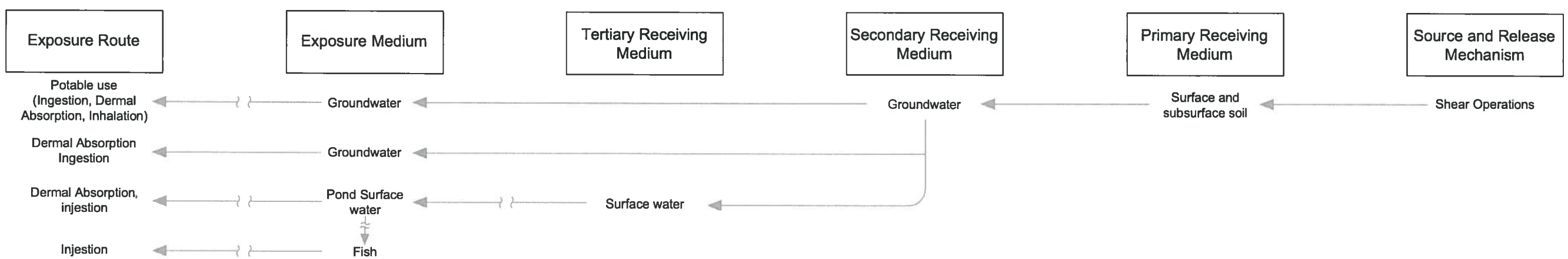


FIGURE 6

stillwater TECHNOLOGIES
203 Hillcrest Street
Orlando, Florida 32801
(407) 206-7222
(407) 206-7223 fax

Conceptual Site Model (Baler)

TMR Valdosta

2000 West Savannah Avenue
Valdosta, Lowndes County, GA
Stillwater Job #216-033

DRAWN:	SML
APPROVED:	BDR
DATE:	01/30/13
SCALE:	N.T.S.

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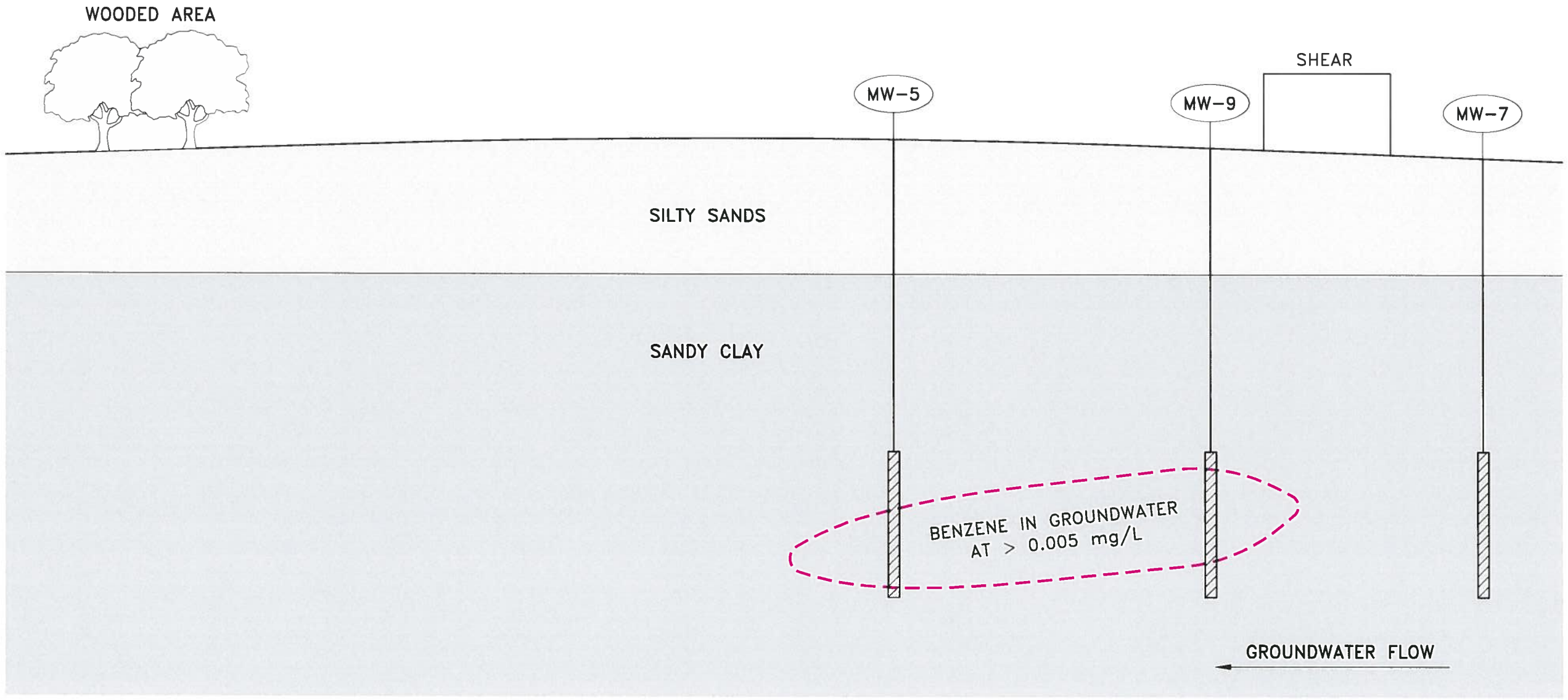

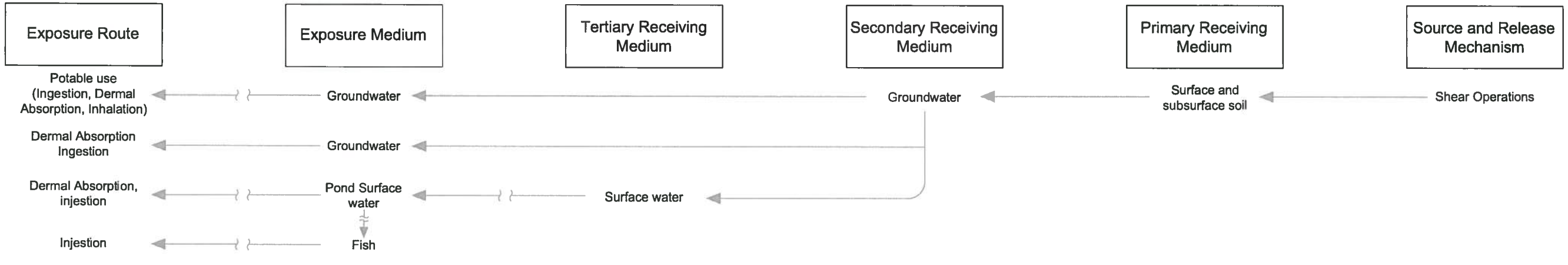

FIGURE 7

stillwater TECHNOLOGIES
203 Hillcrest Street
Orlando, Florida 32801
(407) 206-7222
(407) 206-7223 fax

Conceptual Site Model (Shear)

TMR Valdosta

2000 West Savannah Avenue
Valdosta, Lowndes County, GA
Stillwater Job #216-033

DRAWN:	SML
APPROVED:	BDR
DATE:	01/30/13
SCALE:	N.T.S.

J:\216 The David J. Joseph Company\216-033 TMR Valdosta\Figures\216033 TMR Valdosta Figures_rev2013-02-15.dwg

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DRAWN:	SML
APPROVED:	BDR
DATE:	02/15/13
SCALE:	AS NOTED

Proposed Monitor Wells
TMR Valdosta

2000 West Savannah Avenue
Valdosta, Lowndes County, GA
Stillwater Job #216-033

stillwater TECHNOLOGIES
203 Hillcrest Street
Orlando, Florida 32801
(407) 206-7222
(407) 206-7223 fax

FIGURE
8

Appendix A
Gantt Chart

Stillwater Technologies, Inc.

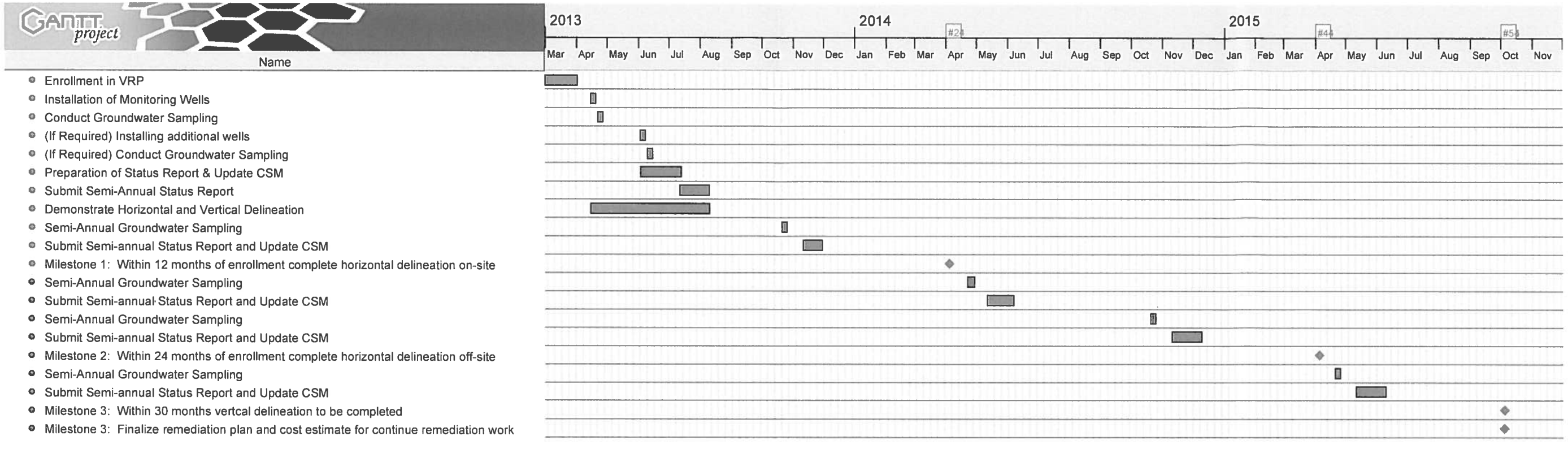
Voluntary Investigation and Remediation Plan Application

TMR-Valdosta
Valdosta, GA.

Stillwater Project No. 216-033

March 7, 2013

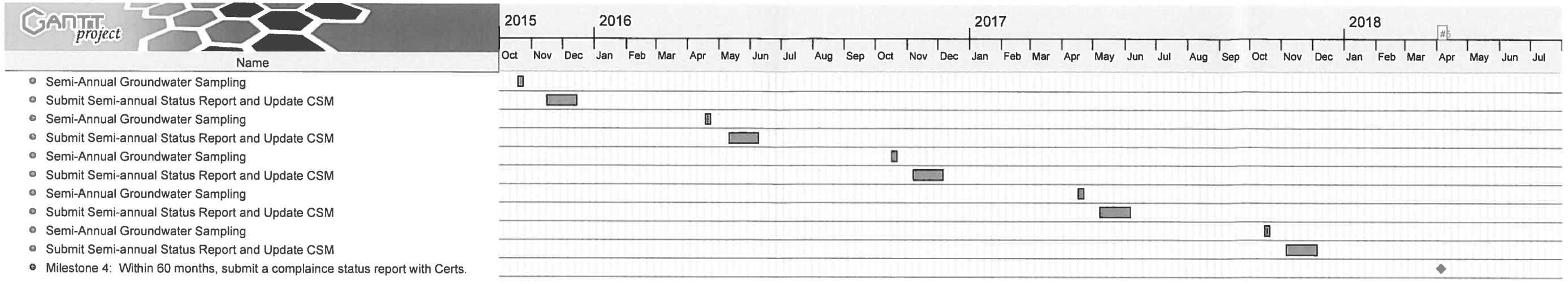
Gantt Chart


GANTT project
Name
2013
2014
2015
Mar Apr May Jun Jul Aug Sep Oct Nov Dec Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov
Enrollment in VRP
Installation of Monitoring Wells
Conduct Groundwater Sampling
(If Required) Installing additional wells
(If Required) Conduct Groundwater Sampling
Preparation of Status Report & Update CSM
Submit Semi-Annual Status Report
Demonstrate Horizontal and Vertical Delineation
Semi-Annual Groundwater Sampling
Submit Semi-annual Status Report and Update CSM
Milestone 1: Within 12 months of enrollment complete horizontal delineation on-site
Semi-Annual Groundwater Sampling
Submit Semi-annual Status Report and Update CSM
Semi-Annual Groundwater Sampling
Submit Semi-annual Status Report and Update CSM
Milestone 2: Within 24 months of enrollment complete horizontal delineation off-site
Semi-Annual Groundwater Sampling
Submit Semi-annual Status Report and Update CSM
Milestone 3: Within 30 months vertcal delineation to be completed
Milestone 3: Finalize remediation plan and cost estimate for continue remediation work

TMR Valdosta Gant Chart

Jan 30, 2013

Gantt Chart



Appendix B
Application Fee

Stillwater Technologies, Inc.

Voluntary Investigation and Remediation Plan Application

TMR-Valdosta
Valdosta, GA.

Stillwater Project No. 216-033

March 7, 2013

Appendix C
Warranty Deed & Tax Plat

Stillwater Technologies, Inc.

Voluntary Investigation and Remediation Plan Application

TMR-Valdosta
Valdosta, GA.

Stillwater Project No. 216-033

March 7, 2013

LOWNDES COUNTY, GEORGIA
REAL ESTATE TRANSFER TAX
PAID $4950.00

BK4880PG001

2011 OCT 12 PM 3:24

CLERK OF SUPERIOR COURT

010692

Above Space Reserved for Recording

Return to:
Zonia N. Veal
First National Financial Title Services, Inc.
3237 Satellite Blvd, Bldg 300, Suite 450
Duluth, GA 30096
File No. H7037-H

LOWNDES COUNTY, GEORGIA
REAL ESTATE TRANSFER TAX
PAID $450.00
DATE Oct. 12 2011
SARA L. CROW
CLERK SUPERIOR COURT

STATE OF GEORGIA

COUNTY OF LOWNDES

GENERAL WARRANTY DEED

This GENERAL WARRANTY DEED (the "Deed") dated the 11th of October, 2011, by and between **RICE IRON & METAL, INC.**, a Georgia corporation, as grantor (the "Grantor") and **TRADEMARK METALS RECYCLING LLC**, a Delaware limited liability company, as grantee (the "Grantee"):

W I T N E S S E T H:

THAT Grantor, for and in consideration of the sum of Ten and No/100 Dollars ($10.00) in hand paid at and before the sealing and delivery of these presents, the receipt whereof is hereby acknowledged, has granted, bargained, sold, aliened, conveyed and confirmed and by these presents does grant, bargain, sell, alien, convey and confirm unto said Grantee, all that certain real property lying and being in Lowndes County, Georgia, being more particularly described on **Exhibit "A"** attached hereto and by this reference made a part hereof, together with any and all plants, trees, timber, shrubbery, improvements, buildings, and fixtures located thereon or attached thereto, and together with any and all right, title and interest of Grantor in and to the improvements, buildings, and fixtures, and all rights, easements, licenses and benefits

appurtenant thereto (hereinafter referred to as the "Property") subject to those matters set forth on **Exhibit "B"**, attached hereto and by this reference made a part hereof.

BK4880PG002

TO HAVE AND TO HOLD the Property with all and singular the rights, members and appurtenances thereof, to the same being, belonging, or in anywise appertaining, to the only proper use, benefit and behoof of the Grantee forever in **FEE SIMPLE**.

AND GRANTOR will warrant and forever defend the right and title to the Property unto Grantee against the claims of all persons whomsoever, subject to those matters set forth on **Exhibit "B"**, attached hereto and by this reference made a part hereof.

[SIGNATURE APPEARS ON THE FOLLOWING PAGE]

IN WITNESS WHEREOF, the Grantor has caused these presents to be executed in its name and its corporate seal to be hereto affixed.

BK4880PG003

RICE IRON & METAL, INC., a Georgia corporation

By: _____
Name: Walter N. Clary
Title: President

(Corporate Seal)

Attest:

_____
Secretary

Signed, Sealed and Delivered in the Presence of:

_____
Unofficial Witness

_____
Notary Public

My Commission Expires: _____

[NOTARIAL SEAL]

RICHARD L. COLEMAN NOTARY PUBLIC LOWNDES COUNTY EXPIRES GEORGIA OCT 25, 2011

EXHIBIT "A"
TO GENERAL WARRANTY DEED

BK4880PG004

DESCRIPTION OF LAND

SURVEY LEGAL DESCRIPTION
ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOT NO. 30 IN THE 11TH LAND DISTRICT OF LOWNDES COUNTY, GEORGIA, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE INTERSECTION OF THE WEST LINE OF LAND LOT 30 AND THE SOUTHERN MARGIN OF THE RIGHT-OF-WAY OF WEST SAVANNAH AVENUE, SAID POINT BEING THE POINT OF BEGINNING;

THENCE, N 63° 31' 44" E FOR A DISTANCE OF 993.37 FEET TO A 5/8" REBAR FOUND,
THENCE, S 31° 00' 00" E FOR A DISTANCE OF 1128.06 FEET TO AN AXLE FOUND,
THENCE, S 67° 38' 12" W FOR A DISTANCE OF 1500.76 FEET TO AN AXLE FOUND,
THENCE, N 04° 17' 58" W A DISTANCE OF 1098.24 FEET TO 1/2" REBAR WITH CAP SET, SAID POINT BEING THE POINT OF BEGINNING.

SAID PARCEL CONTAINS 30.81 ACRES. THIS PARCEL BEING THE SAME AS DESCRIBED IN DEED BOOK 89, PAGE 600, LESS AND EXCEPT RIGHTS OF THE COUNTY OF LOWNDES AND THE PUBLIC TO THE USE OF A GRADED ROAD AS LISTED IN VESTING DEED IN DEED BOOK 89, PAGE 600 AND RIGHT-OF-WAY AS GRANTED IN DEED BOOK 933, PAGE 346.

ALSO BEING DESCRIBED AS:

RECORD LEGAL DESCRIPTION
ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOT NO. 30 IN THE 11TH LAND DISTRICT OF LOWNDES COUNTY, GEORGIA, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

ALL THAT TRACT OR PARCEL OF LAND SITUATE, LYING AND BEING IN LAND LOT NO. 30 IN THE 11TH LAND DISTRICT OF LOWNDES COUNTY, GEORGIA, CONTAINING 32.16 ACRES, MORE OR LESS, AND BEING PARTICULARLY DESCRIBED AS FOLLOWS:
BEGINNING AT A POINT ON THE ORIGINAL WEST LINE OF SAID LAND LOT, WHICH POINT IS THE INTERSECTION OF SAID LAND LOT LINE WITH THE SOUTHERN MARGIN OF THE RIGHT-OF-WAY OF THE ATLANTIC COAST LINE RAILROAD AND FROM SAID POINT OF BEGINNING RUNNING NORTH

[EXHIBIT "A" CONTINUED ON PAGE IMMEDIATELY TO FOLLOW]

EXHIBIT "B"
TO GENERAL WARRANTY DEED

PERMITTED TITLE EXCEPTIONS

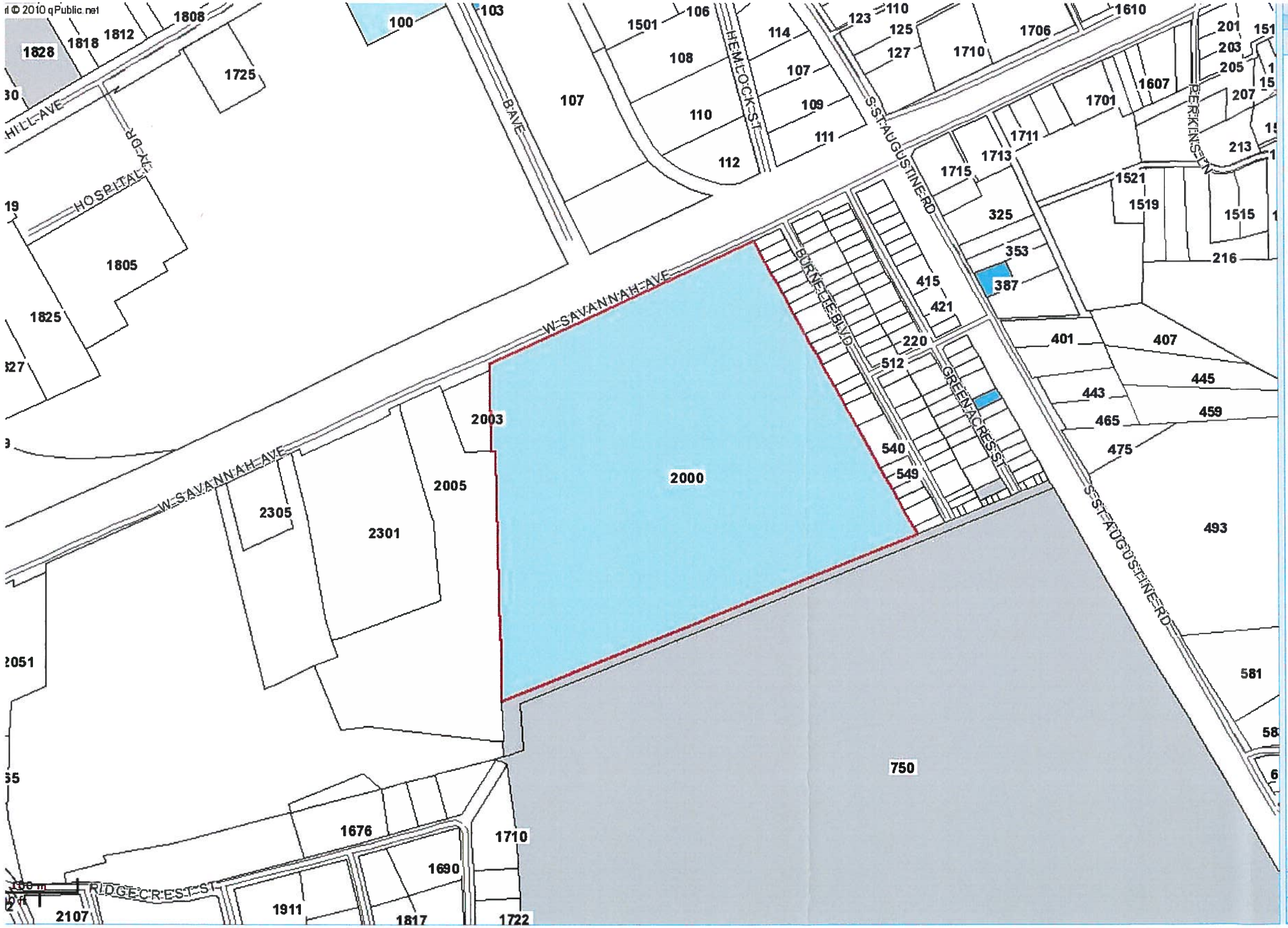
BK4880PG006

1. Ad valorem taxes for calendar year 2011 and subsequent years, a lien not yet due and payable.

2. Any matters shown on that certain ALTA/ACSM Survey for Trademark Metals Recycling, LLC prepared by Wellston Associates Land Surveyors, LLC, dated October 5, 2011 and revised _____.

3. Right of way deed from Rice Iron Metal, Inc., to Lowndes County, Georgia, dated November 6, 1992, and recorded November 12, 1992, in Book 933, Page 346 of the public land records of Lowndes County, Georgia.

4. Right of way and terms and conditions as set forth in the Warranty Deed from J. Ryce Martin to Rice Iron & Metal, Inc., dated January 02, 1964, in Book 89, Page 600 of the public land records of Lowndes County, Georgia.



Reports

Parcel

View as: Google Earth | Bird's Eye | Google Maps & Street View

PARCEL INFORMATION TABLE	
Selected Parcel	0121A 026 (Click for Complete Card)
Class Code (NOTE: Not Zoning Info)	C5
Taxing District	Lowndes County
Acres	27.57
OWNERSHIP INFORMATION	
Name	TRADEMARK METALS RECYCLING LLC
Mailing Address	P O BOX 672 VALDOSTA, GA 316030672
Situs/Physical Address	2000 W SAVANNAH AVE
VALUES	
Land Value	$179,438.00
Improvement Value	$256,277.00
Accessory Value	$2,802.00
Total Value	$438,517.00

LAST 2 SALES			
Date	Price	Reason	Qual
10-2011	$450,000	FM	Q
00-0000	$0	NM	U

Website last updated January 3, 2013
GIS Maps last updated January 28, 2013

Parcel List

Legend

Measure