

February 5, 2024

**VIA ELECTRONIC MAIL ONLY**

Drexel Chemical Company  
c/o Ms. Leigh Shockey, CEO  
P.O. Box 13327  
1700 Channel Avenue  
Memphis, Tennessee 38113

Re: 2023 Annual Certification and Final Groundwater Report  
Drexel Chemical Company, HSI# 10228  
120 Cape Road, Cordele, Crisp County

Dear Ms. Shankle:

The Georgia Environmental Protection Division (EPD) has reviewed the 2023 Annual Certification dated December 5, 2023, and the Final Groundwater Report dated September 2023 for the above referenced site. After completing our review of the referenced documents, EPD concurs with the findings of the Final Groundwater Report that the POD and POE groundwater monitoring locations meet the established residential risk-based standards for 1,2-dibromoethane (EDB) and the scheduled groundwater monitoring events can cease. The groundwater monitoring requirements established within the Uniform Environmental Covenant and associated Monitoring and Maintenance Plan have been met and the monitoring wells at the site may be closed in compliance with the Georgia Water Well Standards Act, O.C.G.A §12-5-134, and Section 2.8 "Well Decommissioning (Abandonment)" of Guidance for the Design and Installation of Monitoring Wells, which can be found at <http://www.epa.gov/region4/sesd/fbqstp/Design-and-Installation-of-Monitoring-Wells.pdf>.

Pursuant to the *Activity and Use Limitation – Annual Certification of Compliance* condition of the UEC, please submit the next Annual Certification Form to EPD by December 31, 2024. If you have any questions regarding this matter, please contact Vanessa Donnelly of the Response and Remediation Program at (470) 524-0548.

Sincerely,



Kevin Collins  
Unit Manager  
Response and Remediation Program

Cc: Timmerly Bullman, Montrose Environmental (email)  
File: HSI # 10228, File ID 220-0017