

Land Protection Branch

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November 28, 2023

VIA EMAIL ONLY: Brent.Sasser@ipaper.com

International Paper
c/o Mr. Brent Sasser
6400 Poplar Avenue
Memphis, Tennessee 38197

Subject: May 2023 Biennial Groundwater Monitoring and Annual Site Inspection Report
St. Regis Wood Treating Site (Former); HSI #10626
Fargo, Clinch County

Dear Mr. Sasser:

The Georgia Environmental Protection Division (EPD) has reviewed the May 2023 Biennial Groundwater Monitoring and Annual Site Inspection Report dated August 1, 2023 for the referenced site. EPD notes that the report was submitted by AECOM on behalf of International Paper (IP) pursuant to the November 2018 Monitoring & Maintenance Plan (MMP) and Uniform Environmental Covenant (UEC), which was approved and signed by EPD on March 27, 2020. Based on a review of the above referenced report, EPD finds the report to be satisfactory to demonstrate that the subject property is being maintained in accordance with the provisions of the UEC (i.e., non-residential and groundwater use restriction).

The MMP proposed groundwater sampling in May 2019, followed by biennial groundwater sampling in 2021 and 2023 with a condition that if groundwater sampling continues to demonstrate stable conditions, IP would request EPD's approval to discontinue groundwater sampling. Based on a review of groundwater monitoring data which indicates stable site groundwater conditions demonstrated through multiple years of groundwater monitoring with no migration off-site, and the fact that the property has a groundwater use restriction in place, IP has requested to discontinue all future groundwater monitoring and decommission/abandon all on-site groundwater monitoring wells. In consideration of the above, EPD approves the discontinuance of groundwater monitoring and wells can be decommissioned in accordance with the Georgia Water Well Standards Act. A report describing the well decommissioning activities should be submitted to EPD subsequent to the decommissioning activities.

Accordingly, Section 3.0 – Groundwater Monitoring Plan of the November 2018 MMP has been satisfied and is no longer applicable regarding annual site inspections/monitoring. Section 4.0 – Annual Inspection of the 2018 MMP to confirm compliance with non-residential standards should continue to be submitted annually to EPD. Annual inspections should include verification that the property is non-residential and that groundwater is not used as drinking water; inspection of the vegetative cover and trees; and confirmation that the fence is locked and secure and that the permanent marker is present.

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The next annual site inspection event is scheduled for May 2024 with the respective report due by August 31st of 2024. Should you have any questions or concerns regarding this site, please contact the undersigned of the Response and Remediation Program at (470) 938-3347 or via email at william.lucas@dnr.ga.gov.

Sincerely,



Kevin Seaway
Unit Manager
Voluntary Remediation Program

cc: Laurel Lunsford, AECOM (via email) <laurel.lunsford@aecom.com>

File: 178-0012 (HSI 10626)