



Environmental Challenges
BUSINESS SOLUTIONS®

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March 9, 2021

Mr. Jason Metzger
Land Protection Branch
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334

Subject: Maintenance and Monitoring Plan
Union Camp dba Thomas Treating Site
Folkston, Charlton County, Georgia
HSI Site No. 10218
EarthCon Consultants, Inc. Project No. 02.20070002.20

Dear Mr. Metzger:

On behalf of International Paper Company (IP) and Culpeper Wood Preservers (Culpeper), EarthCon Consultants, Inc. (EarthCon) is submitting this revised draft *Maintenance and Monitoring Plan* (MMP) for the Thomas Treating Site. The draft MMP was revised to incorporate Georgia Environmental Protection Division (EPD) comments dated February 25, 2021. IP and Culpeper are in the process of coordinating with the current property owner to execute the environmental covenant and provide notification to adjacent landowners. Once EPD approves the attached revised draft MMP and the environmental covenant is recorded, the date that the environmental covenant was recorded will be added to Sections 2 and 5 of the MMP and the parties will provide a copy of the final MMP to EPD for its files.

If you have any questions regarding this report or the project in general, please do not hesitate to contact the undersigned at 770-973-2100.

Sincerely,
EarthCon Consultants, Inc.

Mary Ann Brookshire, CHMM
Senior Scientist

Earl H. Scott
Project Principal

Enclosures

cc: Mr. Brent Sasser - International Paper Company
Mr. Joe Daniel - Culpeper Wood Preservers
Ms. Chris Morgan, Esq. - JonesDay
Mr. Steve Ginski - International Paper Company
Mr. G. Alan Howard – Milam Howard Nicandri Gillam & Renner

MAINTENANCE AND MONITORING PLAN
for
Charlton Tax Parcel F022004001
134 Delia Nelson Street
Folkston, Georgia 31537

Formerly known as
Union Camp dba Thomas Treating Site
Former HSI #10218

March 9, 2021

Prepared by



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1880 West Oak Parkway
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1.0 INTRODUCTION

The Thomas Treating Site, located in Folkston, Georgia, has met the requirements of the Georgia Hazardous Site Response Act (HSRA) for removal from the Hazardous Site Inventory (HSI). In accordance with EPD's requirements, this Continuing Action Maintenance and Monitoring Plan (MMP) establishes the maintenance and monitoring that will apply to the property upon removal from the HSI.

2.0 SITE DESCRIPTION

The Thomas Treating Site is located in Folkston, Charlton County, Georgia (Figure 1). The extent of the Type 5 RRS area consists of an 8.14-acre parcel (tax parcel F022004001) which is shown on Figure 2 (the Property). Concentrations of arsenic and pentachlorophenol in groundwater samples collected from this Property exceed the Type 4 RRS established for the Site. This Property is subject to a recorded uniform environmental covenant (UEC), prepared at the direction of EPD in accordance with the Uniform Environmental Covenant Act and recorded in the property title record on [date].

3.0 MONITORING AND MAINTENANCE ACTIVITIES

This section of the Plan describes the activities that will be performed to document the Property's compliance with the UEC's use restrictions and to satisfy EPD's requirements set forth in its May 29, 2020 *Compliance Status Report* approval letter (the Approval Letter). A summary of the UEC conditions follows:

- Future Property land use is designated as non-residential only.
- The use or extraction of groundwater beneath the Property is prohibited.

In accordance with the Property's UEC, the Property's use will be restricted to non-residential use and groundwater use or extraction will be prohibited. An annual inspection will be performed by the then-current Property owner or its designee to document that the Property continues to be non-residential and that groundwater use remains restricted on the

Property. A copy of the annual inspection form will be maintained on site by the Property owner and submitted to International Paper.

A drainage ditch is located on the eastern edge of the Type 5 parcel. The ditch will be inspected by the then-current Property owner or its designee to verify that the ditch continues to act as a hydraulic barrier. The inspection will include a visual assessment of conditions that could affect groundwater flow into the ditch, such as soil or sediment accumulation in the ditch or changes to topography alongside the ditch. If the annual inspection identifies a general change in the condition of the ditch, including a change to the fence structure, the ditch and/or fence structure will be returned to their acceptable condition prior to the general change occurring. In accordance with the May 29, 2020 EPD Approval Letter of the Revised CSR, the then-current Property owner will remove dry sediment within the fenced area should they become accessible in the future.

4.0 RECORDKEEPING

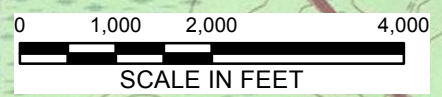
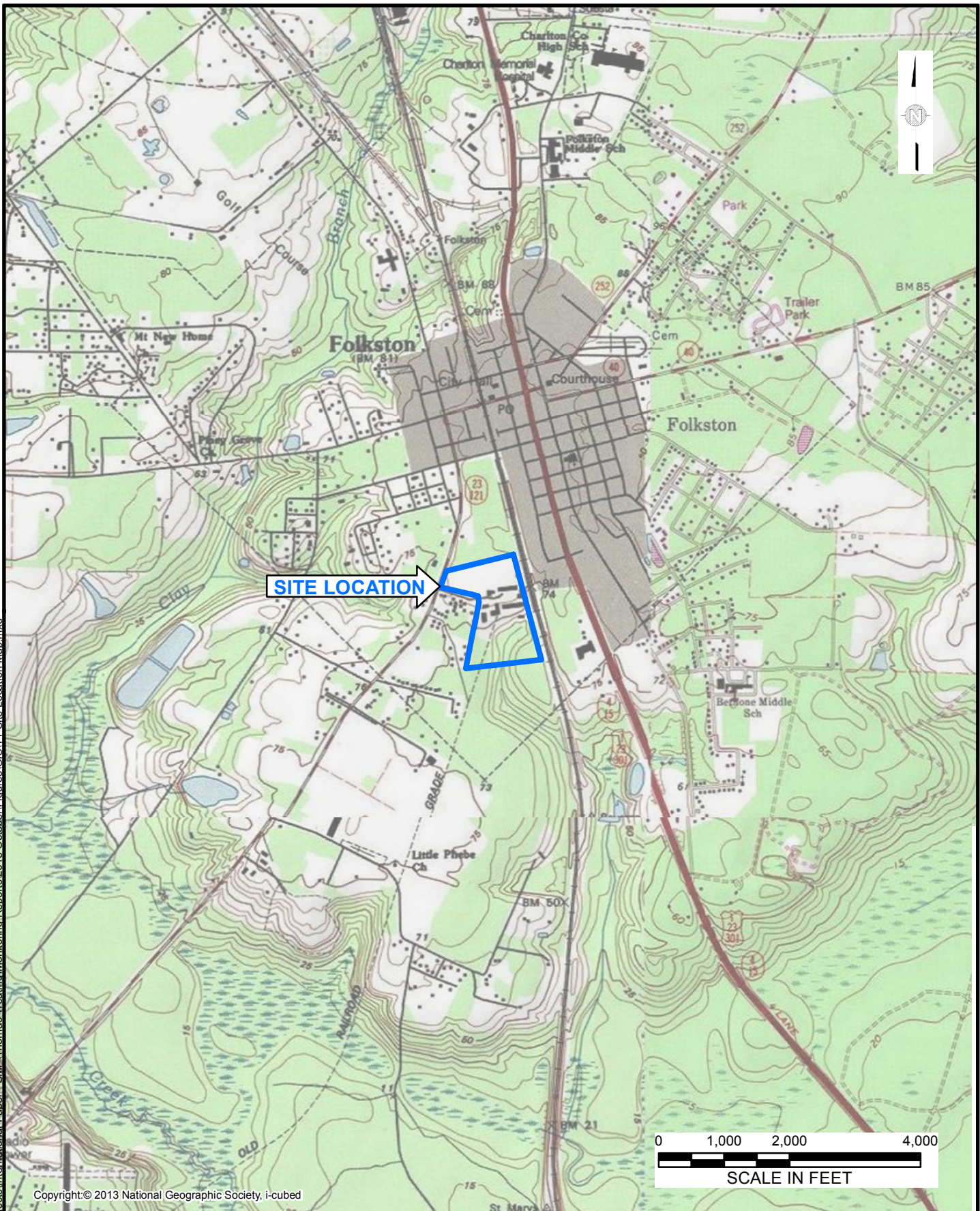
The Property owner will document each annual inspection, and any follow-up inspections, on the form provided in Appendix A. One or more photographs of surface water in the ditch, the area of dry sediment and any unusual conditions will be taken during the inspection. The completed reports including photographs (in paper or electronic format) will be maintained on site by the Property owner and copies will be submitted to International Paper.

5.0 REFERENCES

Uniform Environmental Covenant, recorded on [DATE] in Charlton County, Georgia.

FIGURES

Document Path: S:\Premier\Projects\International Paper - SMP\Thomas Treating\Monitoring Reports\2018 October\Figures\GIS\IT Site Location Map.mxd



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FORMER THOMAS TREATING SITE
FOLKSTON, GEORGIA

PROJECT NO. 02.20070002.20

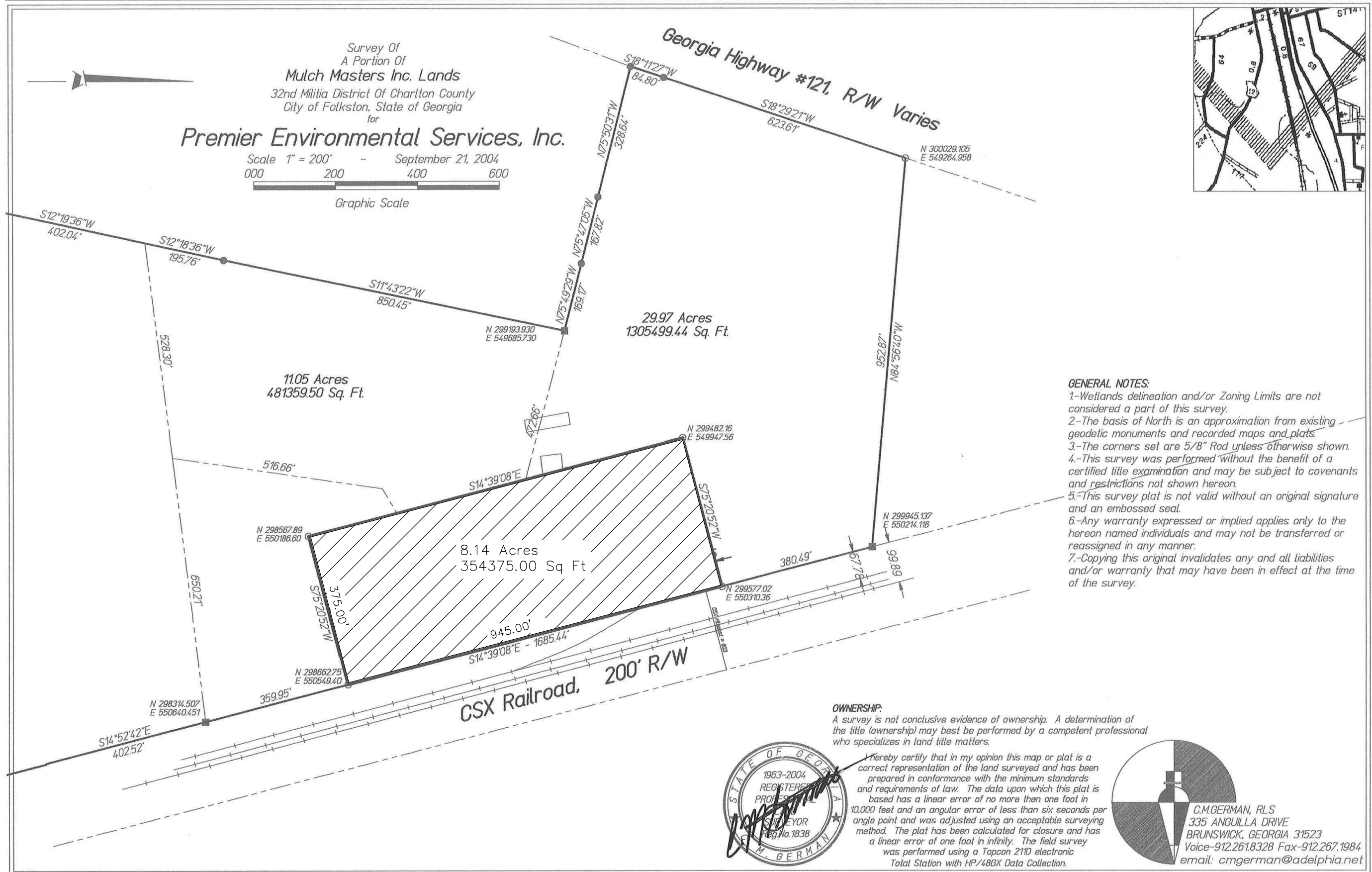


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SITE LOCATION MAP

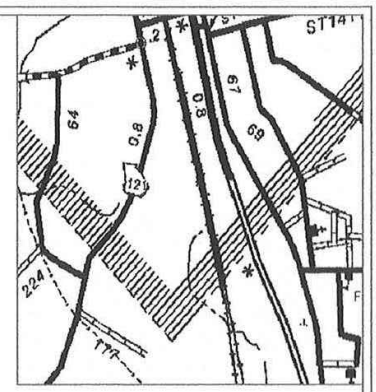
| | | | |
|--------------|----------------|------------------|-------------|
| DRAWN HVP | CHECKED MAB | DATE NOV 2018 | FIGURE 1 |
|--------------|----------------|------------------|-------------|

FILE NAME: \\0.0.10.34\garnet\Projects\Premier\Projects\International Paper - SMP\Thomas Treating\Monitoring Reports\2016 Oct\Figures\Exhibit-B.dwg (Exhibit-B) 12/18/18 11:27 - hpham



Survey Of
A Portion Of
Mulch Masters Inc. Lands
32nd Militia District Of Charlton County
City of Folkston, State of Georgia
for
Premier Environmental Services, Inc.

Scale 1" = 200' - September 21, 2004
000 200 400 600
Graphic Scale

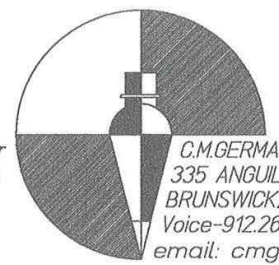


- GENERAL NOTES:**
- 1.-Wetlands delineation and/or Zoning Limits are not considered a part of this survey.
 - 2.-The basis of North is an approximation from existing geodetic monuments and recorded maps and plats.
 - 3.-The corners set are 5/8" Rod unless otherwise shown.
 - 4.-This survey was performed without the benefit of a certified title examination and may be subject to covenants and restrictions not shown hereon.
 - 5.-This survey plat is not valid without an original signature and an embossed seal.
 - 6.-Any warranty expressed or implied applies only to the hereon named individuals and may not be transferred or reassigned in any manner.
 - 7.-Copying this original invalidates any and all liabilities and/or warranty that may have been in effect at the time of the survey.

OWNERSHIP:
A survey is not conclusive evidence of ownership. A determination of the title (ownership) may best be performed by a competent professional who specializes in land title matters.



I hereby certify that in my opinion this map or plat is a correct representation of the land surveyed and has been prepared in conformance with the minimum standards and requirements of law. The data upon which this plat is based has a linear error of no more than one foot in 10,000 feet and an angular error of less than six seconds per angle point and was adjusted using an acceptable surveying method. The plat has been calculated for closure and has a linear error of one foot in infinity. The field survey was performed using a Topcon 211D electronic Total Station with HP/48GX Data Collection.



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FORMER THOMAS TREATING SITE
FOLKSTON, GEORGIA
PROJECT NO. 02.20070002.20

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LOCATION OF TYPE 5 RRS PARCEL

| | | | |
|------------|--------------|------------------|-----------|
| DRAWN: HVP | CHECKED: MAB | DATE: 03/07/2018 | FIGURE: 2 |
|------------|--------------|------------------|-----------|

APPENDIX A

LAND USE CERTIFICATION FORM

Annual MMP Inspection Report
 Thomas Treating Site –HSRA Site No. 10218
 Folkston, Georgia

This Annual MMP Inspection Report covers the 8.14-acre parcel identified as tax parcel F022004001) (the Property). In accordance with the environmental covenant recorded in the Property’s title record, the Property’s use is restricted to non-residential use (as defined by the applicable law) and groundwater use or extracted is prohibited.

| No. | Inspection Requirement | Results | |
|-----|---|---------|----|
| | | Yes | No |
| 1 | Is the Property only being used for non-residential use? (If no, restore non-residential use and perform follow-up inspection.) | | |
| 2 | Is groundwater at the Property being used for any purpose? (If yes, stop groundwater use and perform follow-up inspection.) | | |
| 3 | Have any conditions changed in the drainage ditch along the eastern property boundary that could affect groundwater or surface water flow, or otherwise prevent the ditch from acting as a hydraulic barrier, or have any other conditions of the ditch or fence changed since the previous inspection? Take one or more photographs of surface water in the ditch and any unusual conditions observed. Attach captioned photographs to this report. | | |
| 3a | If yes to Item 3, have the ditch or fence been restored to their previous condition. If yes to Item 3a, attach a brief narrative summarizing the change in conditions and the subsequent response action taken. If no to Item 3a, attach an explanation. | | |
| 4 | Are the dry sediments within the fenced area, specified in the Maintenance and Monitoring Plan, now accessible to removal by excavation? Take one or more photographs of the area of dry sediment and attach a captioned photograph to this report. | | |
| 4a | If yes to Item 4, have the dry sediments been removed? If no to Item 4a, attach an explanation. | | |
| 5 | Date of inspection and name of inspector: Printed Name: Date: | | |

Annual MMP Inspection Report
Thomas Treating Site –HSRA Site No. 10218
Folkston, Georgia

This Annual MMP Inspection Report covers the 8.14-acre parcel identified as tax parcel F022004001) (the Property). In accordance with the environmental covenant recorded in the Property’s title record, the Property’s use is restricted to non-residential use (as defined by the applicable law) and groundwater use or extracted is prohibited.

Additional Explanation:

Item Number: _____

Item Number: _____

Item Number: _____
