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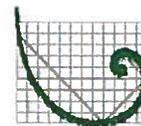
Response and Remediation Program

**Environmental
Resources
Management**

3200 Windy Hill Road, SE
Suite 1500W
Atlanta, GA 30339
678.486.2700
404.745.0103 (fax)

July 22, 2014
0121022

Ms. Carolyn Daniels
Response and Remediation Program
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Drive, SE
Suite 1054, East Tower
Atlanta, Georgia 30334-9000



ERM

Subject: Submittal of the Sixth Semi-Annual Progress Report
to the VRP Program for HSI Site No. 10731
BWAY Corporation - Homerville, Georgia

Dear Carolyn:

This letter is being submitted on behalf of BWAY Corporation (BWAY) for the referenced property. It is intended to serve as the Sixth Semi-Annual Progress Report for this site since it entered the Voluntary Remediation Program (VRP). This site was accepted into the Voluntary Remediation Program by way of correspondence from the Georgia Environmental Protection Division (EPD) dated July 22, 2011.

The last semi-annual report was submitted on January 21, 2014 and indicated that BWAY intended to request a meeting with EPD to discuss the ground water fate and transport modeling results, potential implementation of a uniform environmental covenant (UEC), and the appropriate next steps to complete the Compliance Status Report (CSR) and delist the Site from the HSI. No Voluntary Investigation and Remediation Plan implementation work has been completed for the Site since the last submittal.

BWAY received a comment letter from EPD dated May 1, 2014 which outlined additional delineation, source area investigation, and modeling requirements for the Site. Considering the breadth and detail of the comment letter, ERM and BWAY will be requesting a meeting with EPD to formulate a clear and concise path forward for this site to achieve closure under the VRP. Our proposed objective for the meeting will be to develop a focused path forward for additional activities that will satisfy the requirements of the VRP in an efficient manner.

178-0013
2014
VRP Site
HSI 10731

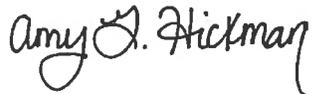
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Ms. Daniels
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July 22, 2014

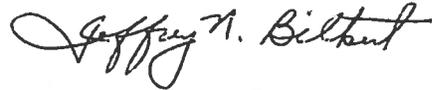
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The professional geologist certification for this progress report submittal and a summary of hours spent by the professional geologist in the last six months are included as Attachments A and B, respectively. Please contact us with any questions or comments you may have.

Sincerely,



Amy G. Hickman, E.I.T.
Project Manager



Jeffrey N. Bilkert
Principal

cc: Steve Barger, BWAY Corporation; Mark Miller, Cornerstone; Bruce Bultman, AEGIS Environmental Inc.

GROUND WATER SCIENTIST STATEMENT

I certify that I am a qualified ground water scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training and experience in ground water hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding ground water monitoring and contaminant fate and transport.

I further certify that this report for Hazardous Site Inventory Site No. 10731 was prepared by me and appropriate qualified subordinates working under my direction.

A summary of the hours spent by the Professional Geologist is provided in Attachment B, in order to comply with Voluntary Remediation Plan Act.



Adria Reimer
Adria Reimer, P.G.
Georgia License No. PG002004

7/23/14
Date

Attachment B
Documentation of Work Performed by the Professional Geologist
BWAY Drum Site
Homerville, GA

Month	Number of Hours Invoiced by Adria Reimer, P.G.		Activities Performed by Adria Reimer, P.G. Since the Previous Submittal
Dec-13	0.0	hours	--
Jan-14	2.5	hours	Review Fifth Semi-Annual Report
Feb-14	0	hours	--
Mar-14	0	hour	--
Apr-14	0	hours	--
May-14	0	hours	--