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Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

April 14, 2015

VIA E-MAIL AND REGULAR MAIL

Brunswick Corporation
c/o Mr. David Selig
1 North Field Court
Lake Forrest, Illinois 60045

Albany Sport Co.
c/o Amer Sports Americas
✓ Ray Berens, Esq.
8750 W. Bryn Mawr Avenue
Chicago, Illinois 60631

Albany Partners, LLC
c/o Slavik Enterprises
✓ Eric Gold
32500 Telegraph Road, #222
Bingham Farms, Michigan 48025

RE: Voluntary Remediation Program Semi-Annual Progress Report and
Final Remedial Plan, January 2015
MacGregor Golf Site, HSI No. 10398
1601 South Slaphey Boulevard, Albany, Dougherty County, Georgia
Tax Parcel 0021-00001-019

Dear Messrs. Selig, Berens, and Gold:

The Georgia Environmental Protection Division (EPD) has reviewed the January 2015 Progress Report and Final Remedial Plan, submitted for the above referenced Site pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD approves the final remedial plan subject to the comments provided, which should be addressed in accordance with the Act:

1. EPD concurs that natural attenuation is sufficient to bring groundwater into compliance with RRS for VOC concentrations around MW-4. Based on the location of the VOC contamination and concentration trends, EPD also concurs that VOC concentrations are being reduced and VOCs will not likely migrate off site.
2. EPD has reviewed the groundwater modeling of chromium in the vicinity of MW-11 and MW-24 provided in Section 2.2 and Appendix B and concurs that the fate and transport modeling and delineation for chromium in the vicinity of MW-11 and MW-24 is complete. Please collect groundwater samples as described in Section 5.1.4.
3. The installation and use of the proposed well on the Taylor property for a point of demonstration well is approved. Please continue to use groundwater analysis from the designated wells to verify fate and transport modeling results as discussed in Section 5.1.4. A preliminary monitoring period of three years appears to be acceptable; however, groundwater monitoring may be extended pending the comparison of sample results to model results.

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4. Groundwater flow direction arrows are incorrectly drawn on Figure 6; please ensure that flow direction is correctly shown on potentiometric maps in subsequent reports.
5. EPD concurs with the focused risk assessment (RA) for subsurface soil presented in Appendix A, and the conclusion that subsurface soils do not pose significant health risks to excavation workers. The following items are provided for clarification only and do not need to be addressed.
 - Section 5 of the RA only discusses exposure frequency and seems to suggest that calculations would be based on an exposure frequency of 1 year instead of 250 days/year. The text would be more clear if it noted an exposure duration of one year and discussed an exposure frequency of 250 days/year. The calculations correctly made this distinction.
 - Although identified in the conceptual site model, the risk from inhalation of vapors in ambient air was not quantified in Table A4. The volatilization factors from soil should be added to the inhalation calculations consistent with the updated inhalation methodology prescribed in RAGS, Part F. In addition, the cancer and non-cancer based equations listed in Table A4 should include the VF_{ss} and VF_p terms in the denominator since the risk and hazard quotients are dimensionless. This clarification results in a minor change to the calculated cancer risk and hazard quotients.

Brunswick Corporation, Albany Sport Company, and Albany Partners LLC (the Group) must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by the Group. However, failure of EPD to respond to a submittal within any timeframe does not relieve the Group from complying with the provisions, purposes, standards and policies of the Act.

Please implement the remedial plan in accordance with the proposed schedule and submit the next progress report by July 30, 2015. If you have any questions, please contact John Maddox of the Response and Remediation Program at (404) 657-0490.

Sincerely,



Jason Metzger
Unit Coordinator
Response and Remediation Program

C: Sarah Jones – Brown and Caldwell (via email)

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