

FIRST SEMI-ANNUAL PROGRESS REPORT

**FORMER CHLORATE PLANT SITE
1400 WEST NINTH STREET
BRUNSWICK, GLYNN COUNTY, GEORGIA
HSI SITE NUMBER 10619**

PREPARED FOR:

**BRUNSWICK CELLULOSE, INC.
1400 WEST NINTH STREET
BRUNSWICK, GEORGIA, 31520**

and

**GEORGIA-PACIFIC LLC
133 PEACHTREE STREET
ATLANTA, GEORGIA, 30303**

PREPARED BY:

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EarthCon Project No. 206163

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PG CERTIFICATION

"I certify under penalty of law that this report and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, et seq.). I am a professional engineer/professional geologist who is registered with the Georgia State Board of Registration for Professional Engineers and Land Surveyors/Georgia State Board of Registration for Professional Geologists and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances.

Furthermore, to document my direct oversight of the Voluntary Remediation Plan development, implementation of corrective action, and long term monitoring, I have attached a monthly summary of hours invoiced and description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division.

The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

Carol Northern

Carol D. Northern, P.G.
Principal Geologist



Date: 9/20/12

1.0 INTRODUCTION

The Voluntary Investigation and Remediation Plan Application (VIRP) for the Brunswick Cellulose, Inc. (BCI) Pulp Mill, located at 1400 West Ninth Street in Brunswick, Glynn County, Georgia (HSI Site #10619) was submitted to the Georgia EPD on October 4, 2011. BCI is a wholly owned subsidiary of Georgia-Pacific LLC (GP). The VIRP was approved in a letter dated March 26, 2012. This First Semi-Annual Progress Report provides a summary of activities conducted at the site from March through August 2012.

2.0 SUMMARY OF SITE ACTIVITIES

As described in the Voluntary Remediation Plan, corrective action for soils will be limited to recording of property notices and an annual site reconnaissance. Corrective action for groundwater will consist of institutional controls, groundwater monitoring and groundwater modeling. Activities conducted from March through August 2012 are described in the following sections.

2.1 Document Submittals

In the VIRP approval letter dated March 23, 2012, Georgia EPD requested the submittal of a cost estimate and financial assurance instrument. These documents were submitted to EPD on April 24, 2012.

As required by Rule 391-3-19-.06(6)2, the appropriate property notices of Rule 391-3-19-.08(1) and (2) were recorded with the clerk of Superior Court of Glynn County on May 7, 2012. A copy of the receipt for the recorded Affidavit was provided to Georgia EPD on May 16, 2012.

Institutional controls will be used to eliminate possible groundwater exposure pathways. To accomplish this, BCI/GP submitted an Environmental Covenant in conformance with the Georgia Environmental Covenants Act to the Georgia EPD on June 8, 2012. On August 31, 2012, Georgia EPD provided BCI/GP with comments to the Environmental Covenant. BCI/GP is currently addressing those comments.

2.2 Quarterly Groundwater Sampling

Groundwater sampling activities were conducted as described in the approved Voluntary Remediation Plan dated October 2011. Groundwater samples were collected during two quarterly

sampling events conducted in May and August 2012. Additionally, well repair activities were conducted in June 2012. A complete description of the field activities is provided in Appendix A. The laboratory analytical results are provided as Appendix B. A summary of the field activities is provided below.

First Quarterly Sampling Event – May 2012

Groundwater samples were collected from 19 monitoring wells from May 8 to May 10, 2012. Groundwater samples collected from seven wells located in the Former Chlorate Plant (FCP) area (CPW-1, CPW-3, CPW-4, CPW-7, CPW-10, CPW-13, and CPW-14) were analyzed for chromium using EPA Method 6020A. Groundwater samples collected from four wells located in the Trailer Parking Lot (LOC06B-MW-01, LOC06-MW-01D, LOC06-MW-02 and LOC06-MW-04) were analyzed for arsenic, chromium, and nickel using EPA Method 6020A. Groundwater samples collected from seven wells located in the Process Area (LOC11D-MW-01, LOC11B-MW-02, LOC11B-MW-02D, LOC11D-MW-03, LOC11B-MW-05, LOC11-MW-07, LOC11-MW-08) and background well LOC17B-MW-01 were analyzed for benzene, select SVOCs, and select metals using EPA Methods 8260B, 8270C, and 6020A, respectively.

Groundwater samples could not be collected from five monitoring wells that were included in the Remediation Plan. Process Area well LOC11D-MW-04 was abandoned by filling with concrete during facility construction activities. Similarly, Process Area well LOC11B-MW-06 and FCP area well CPW-5 are under newly poured concrete pads. Process Area wells LOC11-MW-09 and LOC11-MW-10 were inaccessible during this sampling event.

Monitoring wells CPW-5, LOC11D-MW-04 and LOC11B-MW-06 have been removed from the sampling program. Wells LOC11-MW-09 and LOC11-MW-10 were sampled in June 2012.

Well Repair Activities – June 2012

During the May 2012 sampling event, ten monitoring wells were observed to be damaged. On June 18 and 19, 2012, well repairs were conducted. The repairs ranged from replacing damaged concrete well pads to replacing damaged well vaults, riser pipes and metal stickups. After repairs were completed, select wells were redeveloped to remove sediments or other materials. A description of the well repair activities is provided in Appendix A.

Groundwater samples were collected from Process Area wells LOC11-MW-09 and LOC11-MW-10 on June 18 and 19, 2012. The samples were analyzed for benzene, select SVOCs, and select metals using EPA Methods 8260B, 8270C, and 6020A, respectively.

Second Quarterly Sampling Event

Groundwater samples were collected from 21 monitoring wells from August 6 to August 9, 2012. Groundwater samples collected from seven wells located in the Former Chlorate Plant (FCP) area (CPW-1, CPW-3, CPW-4, CPW-7, CPW-10, CPW-13, and CPW-14) were analyzed for chromium using EPA Method 6020A. Groundwater samples collected from four wells located in the Trailer Parking Lot (LOC06B-MW-01, LOC06-MW-01D, LOC06-MW-02 and LOC06-MW-04) were analyzed for arsenic, chromium, and nickel using EPA Method 6020A. Groundwater samples collected from nine wells located in the Process Area (LOC11D-MW-01, LOC11B-MW-02, LOC11B-MW-02D, LOC11D-MW-03, LOC11B-MW-05, LOC11-MW-07, LOC11-MW-08, LOC11-MW-09, LOC11-MW-10) and background well LOC17B-MW-01 were analyzed for benzene, select SVOCs, and select metals using EPA Methods 8260B, 8270C, and 6020A, respectively.

3.0 PRELIMINARY CONCEPTUAL SITE MODEL

As described in the following sections, the groundwater flow direction and groundwater constituent concentrations are consistent with historical results. Therefore, the Conceptual Site Model presented in the VIRP has not been updated.

3.1 Groundwater Flow

Water level elevation measurements are provided in Table 1. The water level measurements collected on August 6, 2012 were used to develop a potentiometric surface map for the Site. As shown on Figure 1, an area of higher water level elevations extends through the center of the Mill facility. Groundwater flow east of this “high” point is locally to the east toward the aeration stabilization basin (ASB) and other components of the waste water treatment system. Groundwater flow west of this “high” point is to the west toward the Turtle River. Current groundwater flow is consistent with historic groundwater flow.

3.2 Extent of Groundwater Impacts

A summary of the concentrations of constituents detected in the Former Chlorate Plant (FCP) area and the BCI Mill Facility area are provided in Tables 2 and 3, respectively. Figure 2 shows the horizontal

extent of locations at the Site with concentrations of regulated substances in surficial groundwater that exceed the delineation criteria. The concentrations and locations of the detected constituents are consistent with previous detections.

4.0 MONTHLY INVOICE SUMMARY

Georgia EPD requires that the professional engineer/geologist specified in the VIRP oversee the implementation of the VIRP in accordance with the provisions, purposes, standards and policies of the Georgia Voluntary Remediation Program Act. During the 6-month period from March 1 to August 31, 2012, Ms. Carol Northern, P.G. invoiced 52.50 hours on this project. A monthly summary of hours invoiced and a description of services provided is shown in Table 4.

5.0 SCHEDULE

A project schedule for activities described in the Voluntary Remediation Plan is provided in Table 5. The schedule has been updated to reflect the actual Plan approval date and activities already completed. Activities planned for the second semi-annual reporting period (September 2012 through February 2013) include the following:

- Third quarterly sampling event (November 2012)
- Annual site reconnaissance and report submittal (January 2013)
- Fourth quarterly sampling event (February 2013)

The Second Semi-Annual Progress Report will be submitted by March 26, 2013.

TABLES

Table 1: Summary of Water Level Measurements

Well ID	Top of Casing (ft above MSL)	Ground Surface (ft above MSL)	May 7, 2012		August 6, 2012	
			Depth to Water (ft)	Potentiometric Elevations	Depth to Water (ft)	Potentiometric Elevations
Area 2 Landfill						
GWC-01	9.63	--	6.62	3.01	5.50	4.13
GWC-02	12.22	--	9.39	2.83	8.35	3.87
GWC-03	11.49	--	5.91	5.58	4.49	7.00
Area 5 Landfill						
GWC-04 ¹	16.47	--	11.56	4.91	11.29	5.18
GWC-13	20.59	17.55	17.14	3.45	17.52	3.07
GWC-14	12.13	8.98	7.36	4.77	5.67	6.46
Former Chlorate Plant Area						
CPW-1	9.31	9.61	1.99	7.32	1.31	8.00
CPW-2	9.90	10.10	2.08	7.82	1.39	8.51
CPW-3	12.11	9.59	4.74	7.37	4.02	8.09
CPW-4	11.97	9.39	4.60	7.37	3.85	8.12
CPW-5	12.82	10.32	Well under concrete			
CPW-6	9.60	9.82	1.89	7.71	0.96	8.64
CPW-7	11.59	9.29	4.94	6.65	4.56	7.03
CPW-8	9.66	10.13	1.48	8.18	1.08	8.58
CPW-9	9.46	9.94	1.58	7.88	0.94	8.52
CPW-10	13.59	11.15	6.75	6.84	6.46	7.13
CPW-11	11.69	9.36	5.03	6.66	4.64	7.05
CPW-12	11.88	9.40	6.98	4.90	6.68	5.20
CPW-13	9.56	10.13	1.32	8.24	0.84	8.72
CPW-14	12.89	10.40	5.29	7.60	4.93	7.96
BCI Mill Facility Wells						
LOC01B-MW-01	11.44	8.18	Well damaged; can't get WL indicator past 5 feet			
LOC02B-MW-01	11.73	8.41	6.48	5.25	6.37	5.36
LOC04B-MW-01	9.65	6.22	6.45	3.20	5.91	3.74
LOC04C-MW-01	NM	NM	6.08	--	6.37	--
LOC04B-MW-03	11.00	8.39	2.55	8.45	3.05	7.95
LOC05B-MW-01	15.40	10.37	9.83	5.57	9.51	5.89
LOC05C-MW-01	15.45	10.39	9.82	5.63	9.48	5.97
LOC6B-MW-01	24.63	19.74	20.28	4.35	20.28	4.35
LOC6-MW-01D ²	20.97	20.91	19.51	1.46	20.28	0.69
LOC6-MW-01DA ²	21.19	21.15	18.09	3.10	19.19	2.00
LOC6C-MW-01	24.67	19.78	20.38	4.29	20.30	4.37
LOC6-MW-02	16.95	16.88	13.36	3.59	12.91	4.04
LOC6-MW-03	8.13	7.97	4.76	3.37	4.51	3.62
LOC6-MW-04	7.80	7.83	4.14	3.66	3.83	3.97
LOC7B-MW-01 ³	13.02	10.07	NM	--	8.20	4.82
LOC11D-MW-01	5.64	5.87	3.31	2.33	2.90	2.74
LOC11B-MW-02 ²	5.51	5.62	1.61	3.90	5.26	0.25
LOC11B-MW-02D ²	5.47	5.60	5.76	-0.29	5.68	-0.21
LOC11B-MW-02DA ²	5.47	5.56	6.53	-1.06	6.21	-0.74
LOC11D-MW-03 ²	13.30	8.12	4.95	8.35	4.50	8.80
LOC11D-MW-04	NA	6.43	Well abandoned			
LOC11B-MW-05	8.52	8.81	2.14	6.38	2.36	6.16
LOC11B-MW-06	5.47	5.65	Well under concrete			
LOC11-MW-07	8.11	8.05	3.21	4.90	2.91	5.20
LOC11-MW-08	7.58	7.79	NM	--	1.92	5.66
LOC11-MW-09	8.54	8.60	NM	--	0.90	7.64
LOC11-MW-10	9.03	9.20	2.06	6.97	1.45	7.58
Background Wells						
LOC17B-MW-01	0.30	0.49	0.82	-0.52	0.70	-0.40
LOC18B-MW-01	9.53	4.21	6.39	3.14	6.00	3.53

Notes:

¹Removed 0.22 feet of casing during May sampling event; change reflected in TOC elevation

²Elevation not used to develop potentiometric surface map

³Well casing repaired in July 2012; new TOC based on measurement of 2.95 feet of stickup from concrete pad

Table 2: Summary of Groundwater Analytical Results -FCP Area

Well Location	Jul-99	Dec-99	Jun-00	Sep-00	Dec-00	Jan-01	Apr-01	Sep-01	Mar-02	Jul-02	Nov-02	Mar-06	Jul-06	Sep-06	Dec-09	May-12	Aug-12
CPW-1	1.7	1.4	0.31	0.38	0.28	--	0.35	0.29	0.29	0.17	0.16	0.13	--	--	--	0.72	0.99
CPW-2	0.044	<0.01	0.029	0.067	0.026	--	0.025	0.028	0.051	0.019	<0.01	na	na	na	na	na	na
CPW-3	0.033	0.098	0.077	0.037	0.039	--	0.054	0.053	<0.01	0.16	0.17	0.48	--	--	--	0.45	0.36
CPW-4	--	2.2	0.085	0.097	0.043	--	0.019	0.052	0.026	0.027	0.035	0.72	--	--	--	0.11J	<0.1
CPW-5	--	0.52	0.25	0.21	0.23	--	0.14	0.22	0.15	0.087	0.071	0.067	--	--	--	na	na
CPW-6	--	0.27	0.086	0.092	0.064	--	0.039	0.049	0.045	0.016	0.051	--	0.1	--	--	--	--
CPW-7	--	3.5	2.1	3	3.8	--	3.8	5.5	0.64	1.6	3	5.5	--	--	--	26	19
CPW-8	--	0.054	0.1	0.025	0.13	--	0.1	0.074	0.036	0.011	0.022	--	0.014	--	--	--	--
CPW-9	--	0.067	0.055	0.37	0.071	--	0.02	0.039	0.036	0.015	0.091	0.05	--	--	0.062	--	--
CPW-10	--	0.061	0.038	0.061	0.07	--	0.08	0.069	0.072	0.024	0.024	--	1.4	--	--	0.24	0.25
CPW-11	--	0.034	0.022	0.023	0.02	--	0.023	0.025	0.02	0.024	0.037	0.067	--	--	--	--	--
CPW-12	--	<0.01	<0.01	<0.01	<0.01	--	<0.01	<0.01	<0.01	<0.01	<0.01	--	--	<0.01	--	--	--
CPW-13	--	--	--	--	--	0.4	0.078	0.064	0.039	0.01	0.018	--	0.069	--	0.47J	0.30	0.47
CPW-14	--	--	--	--	--	0.052	0.13	0.11	0.085	0.097	0.14	0.062	0.066	--	0.14	0.057J	<0.1

bold - indicates concentration exceeds delineation criteria of 0.1 mg/L for chromium
 na - well not sampled; destroyed
 -- well not sampled on this date

Table 3: Summary of Groundwater Analytical Results - BCI Mill Facility

Regulated Substance (mg/L)	Delineation Criteria	Log Storage Area			Wood Yard			Area 4			Trailer Parking Lot							
		LOC01-DP-01 3/15/04	LOC01B-MW-01 5/15/04 12/14/04		LOC02-DP-01 3/16/04	LOC02B-MW-01 5/15/04 12/16/04 3/21/06			LOC05-DP-01 3/11/04	LOC05B-MW-01 5/16/04 7/18/06 11/29/06			LOC05C-MW-01 5/16/04	LOC06-DP-01 3/11/04	LOC06B-MW-01 12/16/04 3/21/06 12/1/09 3/5/10 5/8/12 8/7/12			
Organics																		
Benzene	0.005	<0.001	--	--	<0.001	--	--	--	--	--	--	<0.001	--	<0.001	--	--	--	--
3&4-Methylphenol	DL	<0.010	--	--	<0.010	<0.002	--	--	<0.010	--	--	--	--	<0.010	--	--	--	--
Naphthalene	0.02	<0.010	--	--	<0.010	--	--	--	<0.010	--	--	--	--	<0.010	--	--	--	--
Phenanthrene	DL	<0.010	--	--	<0.010	--	--	--	<0.010	--	--	--	--	<0.010	--	--	--	--
Inorganics																		
Antimony	0.006	--	<0.006	--	--	<0.006	--	--	<0.03	--	<0.006	--	--	<0.03	--	<0.1	--	--
Arsenic	0.01	--	<0.01	--	--	<0.01	--	--	<0.05	--	<0.01	--	--	0.069	<0.25	0.12	0.046J	0.082
Chromium	0.1	--	0.017	--	--	0.094	0.0374	0.021	<0.05	--	--	--	--	<0.05	--	--	--	<0.1
Lead	0.015	--	<0.005	--	--	0.019	<0.01	--	<0.013	--	--	--	--	<0.013	--	--	--	--
Mercury	0.002	--	<0.0002	--	--	<0.0002	--	--	<0.001	--	--	--	--	<0.001	0.00064	<0.002	--	--
Nickel	0.1	--	0.012	<0.02	--	0.018	<0.02	--	<0.2	<0.01	--	--	<0.01	0.36	0.691	0.68	0.4	0.45

-- not analyzed
 DL - Detection Limit
 bold - detected at concentration above Delineation Criteria
 Individual isomers of 3&4-methylphenol were not reported by the laboratory

Table 3: Summary of Groundwater Analytical Results - BCI Mill Facility

Regulated Substance (mg/L)	Delineation Criteria	LOC06-MW-01D				LOC06-MW-01DA 3/5/10	Trailer Parking Lot LOC06-MW-02			LOC06-MW-03 1/14/10	LOC06-MW-04			LOC11-DP-01 3/11/04	Process Area LOC11D-MW-01				LOC11-DP-02 3/11/04
		1/15/10	3/5/10	5/8/12	8/7/12		1/14/10	5/8/12	8/7/12		1/14/10	5/8/12	8/7/12		12/16/04	7/19/06	5/9/12	8/9/12	
Organics																			
Benzene	0.005	--	--	--	--	--	<0.001	--	--	--	--	--	--	<0.001	<0.005	0.0035	<0.005	<0.005	0.0017
3&4-Methylphenol	DL	--	--	--	--	--	<0.0095	--	--	--	--	--	--	<0.01	0.022	0.026	<0.01	<0.0095	0.029J
Naphthalene	0.02	--	--	--	--	--	<0.0095	--	--	--	--	--	--	0.1	0.96	0.73	0.016	0.01	1.3
Phenanthrene	DL	--	--	--	--	--	<0.0095	--	--	--	--	--	--	0.018	0.029	0.022	<0.01	<0.0095	0.12
Inorganics																			
Antimony	0.006	--	--	--	--	--	<0.006	--	--	--	--	--	--	<0.03	<0.02	<0.006	<0.006	<0.006	0.038
Arsenic	0.01	0.081	0.048	0.021	0.037	<0.01	0.011J	0.017	0.013	<0.01	<0.01	<0.01	<0.01	<0.05	--	<0.01	<0.01	<0.01	<0.01
Chromium	0.1	--	--	<0.1	0.17	--	0.15	0.12	0.21	--	--	<0.1	<0.1	<0.05	0.0378	0.032	<0.1	<0.1	<0.01
Lead	0.015	--	--	--	--	--	<0.01	--	--	--	--	--	--	<0.013	<0.01	--	<0.015	<0.015	0.018
Mercury	0.002	--	--	--	--	--	0.00057	--	--	--	--	--	--	<0.001	<0.0002	--	<0.002	<0.002	0.0044
Nickel	0.1	0.41	0.27	0.12	0.26	<0.035	0.15	0.14	0.18	<0.035	<0.035	<0.1	<0.1	<0.2	0.0202	--	<0.005	<0.01	0.062

-- not analyzed

DL - Detection Limit

bold - detected at concentration above Delineation Criteria

Individual isomers of 3&4-methylphenol were not reported by the laboratory

Table 3: Summary of Groundwater Analytical Results - BCI Mill Facility

Regulated Substance (mg/L)	Delineation Criteria	Process Area																	
		LOC11B-MW-02				LOC11B-MW-02D				LOC11B-MW-02DA		LOC11-DP-03		LOC11D-MW-03				LOC11-DP-04	LOC11D-MW-04
		12/15/04	7/19/06	5/9/12	8/9/12	9/14/06	11/29/06	5/10/12	8/9/12	12/11/06	3/11/04	12/17/04	7/19/06	5/10/12	8/9/12	3/11/04	12/17/04	3/11/04	
Organics																			
Benzene	0.005	<0.005	<0.01	<0.005	<0.005	0.025	--	0.020 J	0.010 J	<0.001	0.005	<0.25	<0.01	<0.005	<0.005	0.038	0.012	0.0023	
3&4-Methylphenol	DL	0.022	<0.038	0.17J	<0.47	<0.094	--	<0.025	<0.47	<0.0097	0.17	0.036	0.13	<0.0098	<0.0097	<0.05	<0.01	<0.01	
Naphthalene	0.02	1.6	0.74	3.5	1.7	0.82	--	1.4	3	<0.0097	0.04	0.087	0.25	<0.0098	0.048	<0.05	<0.01	0.051	
Phenanthrene	DL	0.18	0.065	0.17J	<0.47	<0.094	--	0.15J	<0.47	<0.0097	0.011	0.13	0.19	<0.0098	0.03	0.065	0.023	<0.01	
Inorganics																			
Antimony	0.006	0.0266	0.2	0.036	0.026	<0.006	<0.02	0.0069	<0.006	<0.006	<0.03	<0.02	<0.006	<0.006	<0.006	<0.03	<0.02	<0.006	
Arsenic	0.01	--	--	0.018	0.027	0.028	0.011	0.033	0.025	<0.01	<0.05	--	<0.01	<0.01	<0.01	<0.05	--	<0.01	
Chromium	0.1	<0.01	--	<0.1	<0.1	0.35	0.076	0.28	0.32	<0.01	0.25	0.232	0.12	<0.1	<0.1	0.41	0.352	0.058	
Lead	0.015	<0.01	--	<0.015	<0.015	<0.005	<0.005	<0.015	<0.015	<0.005	<0.013*	<0.01	--	<0.015	<0.015	0.24	0.0247	<0.005	
Mercury	0.002	0.00298	0.0046	0.0028	0.002 J	<0.002	0.00021	<0.002	<0.004	<0.0002	<0.001	<0.0002	--	<0.002	<0.002	<0.001	0.00027	<0.0002	
Nickel	0.1	0.0295	--	0.028	<0.1	0.099	<0.03	0.081	<0.1	<0.03	<0.2	0.0512	0.036	<0.005	<0.1	<0.2	0.0568	<0.04	

-- not analyzed
 DL - Detection Limit
 bold - detected at concentration above Delineation Criteria
 Individual isomers of 3&4-methylphenol were not reported by the laboratory

Table 3: Summary of Groundwater Analytical Results - BCI Mill Facility

Regulated Substance (mg/L)	Delineation Criteria	LOC11B-MW-05					LOC11-DP-06	LOC11B-MW-06			Process Area LOC11-MW-07			LOC11-MW-08			LOC11-MW-09			LOC11-MW-10			
		5/16/04	12/15/04	7/19/06	5/10/12	8/9/12	3/11/04	5/16/04	12/15/04	7/19/06	1/15/10	5/9/12	8/8/12	1/15/10	5/9/12	8/9/12	1/15/10	6/18/12	8/9/12	1/14/10	6/18/12	8/8/12	
Organics																							
Benzene	0.005	0.003	<0.005	0.0022	<0.005	<0.005	<0.001	<0.001	<0.005	<0.001	<0.001	<0.005	<0.005	<0.001	<0.005	<0.005	<0.001	<0.005	<0.005	<0.001	<0.005	<0.005	
3&4-Methylphenol	DL	0.016	0.015	<0.0094	0.013	0.016	<0.010	0.0056	<0.01	<0.01	<0.0094	<0.049	<0.049	<0.0094	<0.0096	<0.0097	<0.0094	<0.0099	<0.0096	<0.0094	<0.0097	<0.0096	
Naphthalene	0.02	0.095	0.075	0.06	0.085	0.083	0.084	0.12	0.056	0.11	0.16	0.31	0.26	<0.0094	<0.0096	<0.0097	<0.0094	<0.0099	<0.0096	<0.0094	<0.0097	<0.0096	
Phenanthrene	DL	0.0053	<0.01	<0.0094	<0.0099	<0.0097	0.016	0.013	<0.01	<0.01	0.039	0.054	<0.049	<0.0094	<0.0096	<0.0097	<0.0094	<0.0099	<0.0096	<0.0094	<0.0097	<0.0096	
Inorganics																							
Antimony	0.006	--	<0.02	--	<0.006	<0.006	<0.03	--	<0.02	<0.006	--	<0.006	<0.006	<0.006	<0.006	<0.006	<0.006	<0.006	<0.006	--	<0.006	<0.006	
Arsenic	0.01	--	--	--	<0.01	<0.01	<0.05	--	--	<0.01	--	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	--	<0.01	<0.01	
Chromium	0.1	<0.01	0.0193	--	0.11	<0.1	0.12	0.036	0.124	<0.01	0.018	0.12	0.15	0.049	<0.1	<0.1	<0.01	<0.1	<0.1	<0.01	<0.1	<0.1	
Lead	0.015	--	<0.01	--	<0.015	<0.015	0.17	0.018	0.0115	--	--	<0.015	<0.015	--	<0.015	<0.015	--	<0.015	<0.015	--	<0.015	<0.015	
Mercury	0.002	0.00065	0.00042	--	<0.002	<0.002	0.016	0.0012	0.0018	<0.0002	--	<0.002	<0.002	<0.0002	<0.002	<0.002	<0.0002	<0.002	<0.002	<0.002	--	<0.002	<0.002
Nickel	0.1	0.014	0.0222	--	0.039	<0.1	<0.2	0.039	0.0874	<0.035	--	0.054	<0.1	--	0.028	<0.1	--	<0.005	<0.1	--	<0.005	<0.1	

-- not analyzed

DL - Detection Limit

bold - detected at concentration above Delineation Criteria

Individual isomers of 3&4-methylphenol were not reported by the laboratory

Table 3: Summary of Groundwater Analytical Results - BCI Mill Facility

Regulated Substance (mg/L)	Delineation Criteria	Background						
		LOC13-DP-01 3/12/04	5/14/04	LOC17B-MW-01 12/14/04 5/10/12		8/9/12	LOC18B-MW-01 5/14/04 12/14/04	
Organics								
Benzene	0.005	<0.001	--	<0.005	<0.005	<0.005	--	<0.005
3&4-Methylphenol	DL	<0.01	--	<0.010	<0.0098	<0.0095	--	<0.010
Naphthalene	0.02	<0.01	--	<0.010	<0.0098	<0.0095	--	<0.010
Phenanthrene	DL	<0.01	--	<0.010	<0.0098	<0.0095	--	<0.010
Inorganics								
Antimony	0.006	<0.006	<0.006	<0.02	<0.006	<0.006	<0.006	<0.02
Arsenic	0.01	0.016	<0.01	<0.05	<0.01	<0.01	<0.01	<0.05
Chromium	0.1	0.018	<0.01	<0.01	<0.1	<0.1	<0.01	<0.01
Lead	0.015	0.0084	<0.005	<0.01	<0.015	<0.015	<0.005	<0.01
Mercury	0.002	<0.0002	<0.0002	<0.0002	<0.002	<0.002	<0.0002	<0.0002
Nickel	0.1	<0.04	<0.01	<0.02	<0.005	<0.1	<0.01	<0.02

-- not analyzed

DL - Detection Limit

bold - detected at concentration above Delineation Criteria

Individual isomers of 3&4-methylphenol were not reported by the laboratory

Table 4: Summary of Monthly Invoices

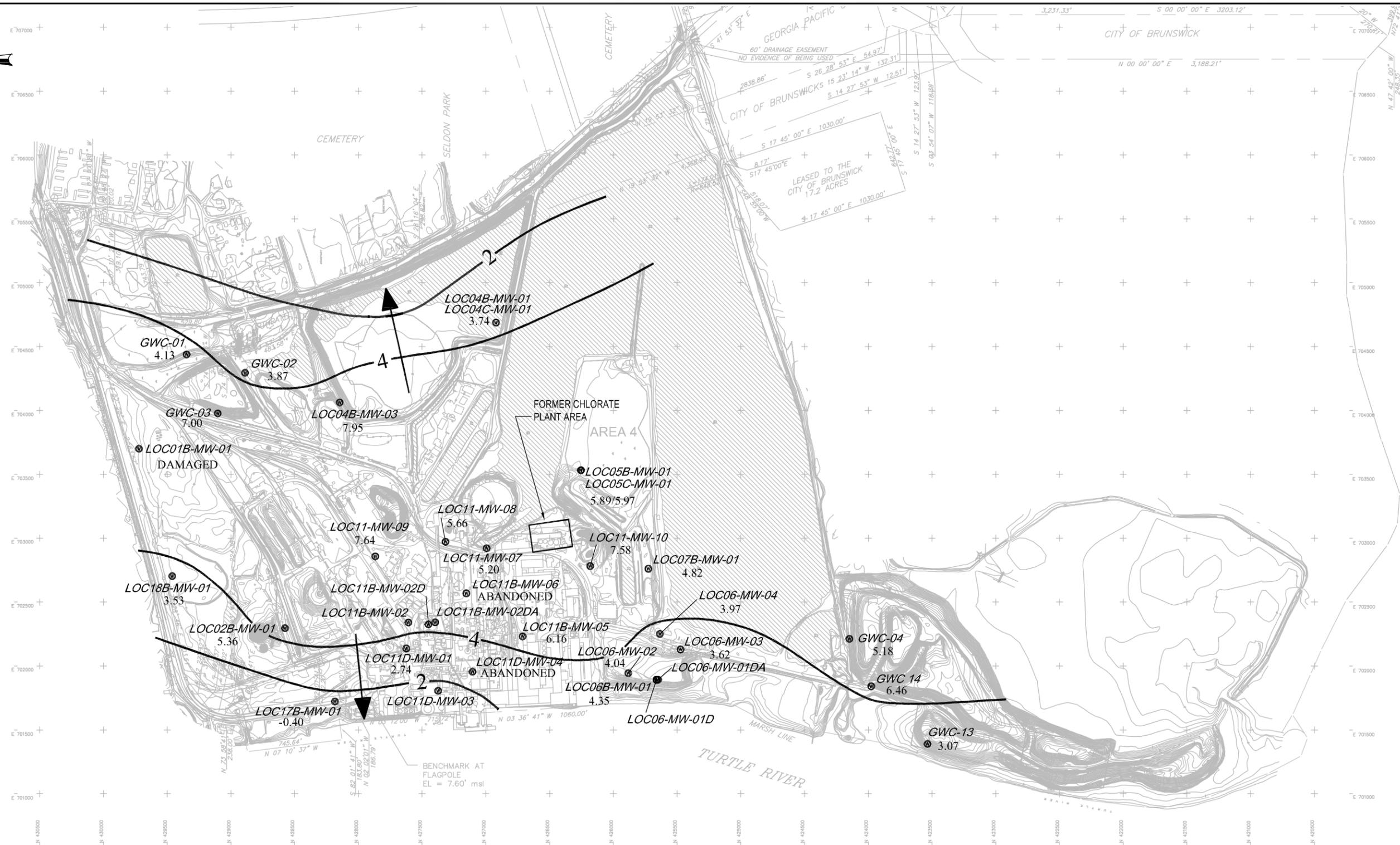
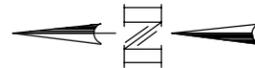
Month	Hours Billed by Carol Northern, P.G.	Description of Activities
March 2012	8.5	<ul style="list-style-type: none"> – Review March 26, 2012 VIRP acceptance and comment letters – Prepare draft cost estimate for Remediation Plan implementation – Initial scheduling for First Quarterly Sampling Event
April 2012	14.25	<ul style="list-style-type: none"> – Meeting with BCI/GP to discuss cost estimate and schedule for implementation of Remediation Plan – Preparation and submittal of response to VIRP comment letter – Prepare SOW, review HASP, review planned activities with sampling team
May 2012	4.5	<ul style="list-style-type: none"> – Review draft Uniform Environmental Covenant – Participate in calls from field sampling team – Coordinate with analytical laboratory
June 2012	10	<ul style="list-style-type: none"> – Review laboratory analytical results – Review well repair and sampling activities with field team
July 2012	4	<ul style="list-style-type: none"> – Initial scheduling for Second Quarterly Sampling Event – Revise SOW
August 2012	11.25	<ul style="list-style-type: none"> – Review planned activities with sampling team – Participate in calls from field sampling team – Coordinate with analytical laboratory – Review laboratory analytical results

Table 5: Revised Milestone Schedule

Date	Activity
March 26, 2012	VRP Application Approved
April 24, 2012	Cost Estimate and Financial Instrument Submitted
May 7, 2012	Filing of Affidavit with clerk of Superior Court of Glynn County pursuant to O.C.G.A. §44-2-20
May 16, 2012	Submittal of copy of receipt of recorded Affidavit to EPD
May 7-10 and June 18-19, 2012	First Quarterly Sampling Event and Well Repair Activities
August 6-9, 2012	Second Quarterly Sampling Event
September 26, 2012	First Semi-Annual Progress Report
November 2012 /February 2013	Third and Fourth Quarterly Sampling Events
March 26, 2013	Second Semi-Annual Progress Report
August 2013	First Semi-Annual Sampling Events
September 26, 2013	Third Semi-Annual Progress Report
February 2014	Second Semi-Annual Sampling Event
March 26, 2014	Fourth Semi-Annual/24-Month Progress Report*
September 26, 2014	30-Month Progress Report
February 2015	First Annual Sampling Event
March 26, 2015	First Annual Progress Report
February 2016	Second Annual Sampling Event
March 26, 2016	Second Annual Progress Report
February 2017	Third Annual Sampling Event
March 27, 2017	Compliance Status Report Update

*Note – Once the groundwater monitoring frequency has been reduced to annually, BCI/GP anticipates reducing the frequency of reporting from semi-annually to annually.

FIGURES



LEGEND:

- MW-01 WELL LOCATION
- 4 — ESTIMATED GROUNDWATER POTENTIOMETRIC SURFACE, FT. MSL, AUGUST 2012
- ← GROUNDWATER FLOW DIRECTION

WATER LEVEL DATA COLLECTED BY: PREMIER ENVIRONMENTAL
BASE MAP PROVIDED BY: HOLLEY CONSULTANTS DATED: AUG. 1999

SCALE IN FEET



BRUNSWICK CELLULOSE, INC.
BRUNSWICK, GEORGIA

PROJECT NO. 206163

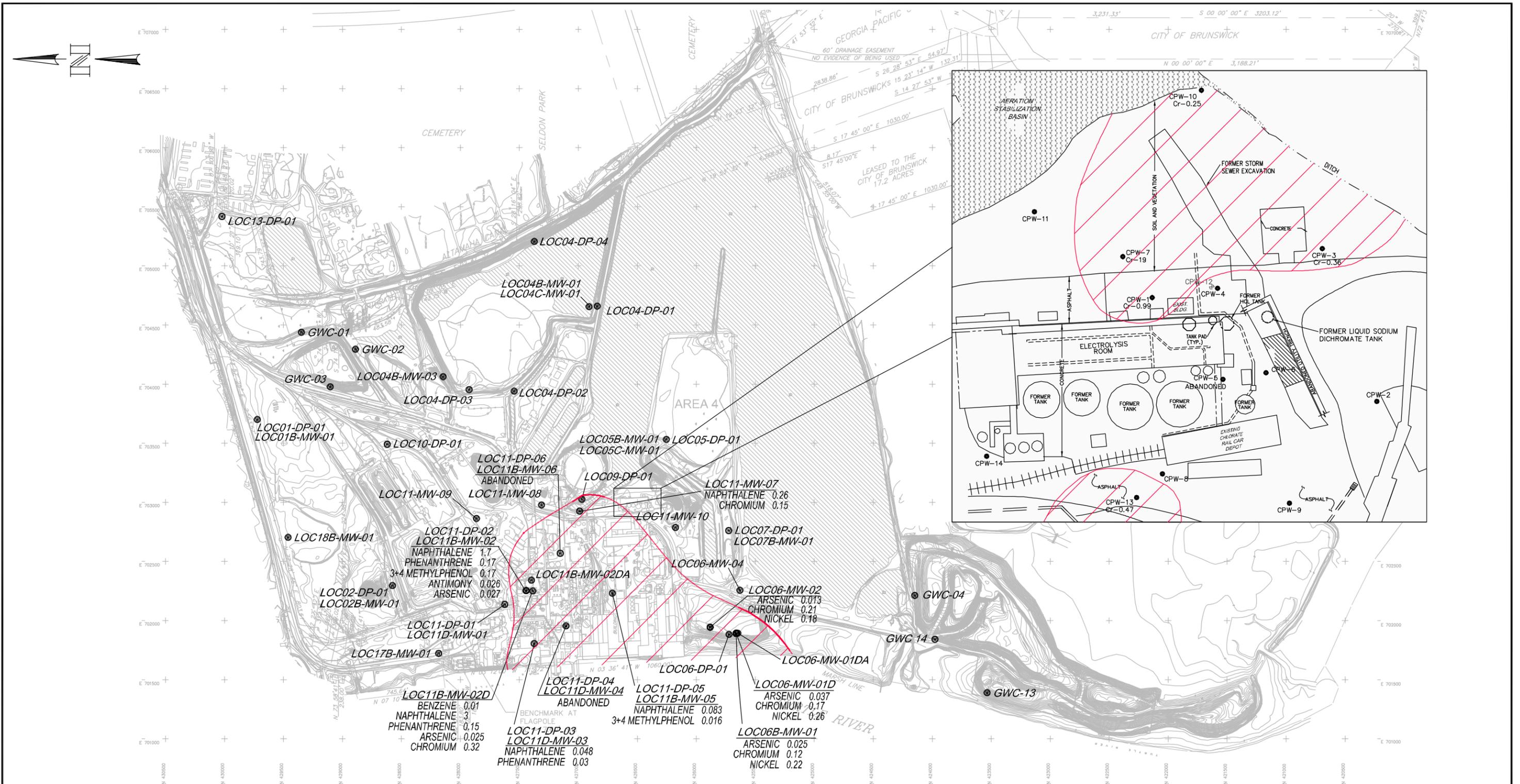


EarthCon Consultants, Inc.

1880 WEST OAK PKWY, BLDG 100, STE 106, MARIETTA, GA, 30062

POTENTIOMETRIC SURFACE MAP
AUGUST 2012

DRAWN: ED	CHECKED: PK	DATE: 9/13/2012	FIGURE: 1
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LEGEND:
 ● MW-01 WELL LOCATION
 ▨ AREA ABOVE DELINEATION CRITERIA
 BENZENE 0.025 CONSTITUENT CONCENTRATION IN MG/L



BASE MAP PROVIDED BY: HOLLEY CONSULTANTS DATED: AUG. 1999

BRUNSWICK CELLULOSE, INC.
 BRUNSWICK, GEORGIA
 PROJECT NO. 206163

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SUMMARY OF CONSTITUENTS
 IN GROUNDWATER
 ABOVE DELINEATION CRITERIA

DRAWN: TM/SBH/ED	CHECKED: PK	DATE: 9/13/2012	FIGURE: 2
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FILENAME: 206163 - GW ABOVE DC FIG