

SEMI-ANNUAL PROGRESS REPORT #7

1071 HOWELL MILL ROAD
ATLANTA, FULTON COUNTY, GEORIGA
HSI SITE NO. 10637 (WELCOME YEARS, INC.)

Submitted To:

Georgia Environmental Protection Division Hazardous Waste Management Branch Suite 1154, East Tower 2 Martin Luther King Jr. Drive Atlanta, Georgia 30334

Prepared For:

Westbridge Partners & 1071 WB, LLC 1170 Howell Mill Road Atlanta, Georgia 30318

Prepared By:

Amec Foster Wheeler Environment & Infrastructure, Inc. 2677 Buford Highway, NE Atlanta, Georgia 30324

Project No. 6121-12-0124



June 2, 2016

Mr. David Reuland Unit Coordinator **Environmental Protection Division** Georgia Department of Natural Resources 2 Martin Luther King Jr. Drive, SE, Suite 1462 East Atlanta, Georgia 30334

RE: Semi-Annual Progress Report #7

1071 Howell Mill Road Atlanta, Georgia HSI Sub-Listed Site No. 10637 (Welcome Years, Inc.) Tax Parcel ID#17-0150-009-14

Dear Mr. Reuland:

Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler) respectfully submits this Progress Report #7 for the 1071 Howell Mill Road property in Atlanta, Fulton County, Georgia, on behalf of 1071 WB, LLC, an affiliate of Westbridge Partners. This progress report is required by the Voluntary Remediation Program (VRP) statute and requested by the Georgia Environmental Protection Division (EPD) in their comment letter dated October 15, 2012.

This report is for the exclusive use of Westbridge Partners and 1071 WB, LLC, and for regulatory submittal. If additional information is required, please contact Mr. Chuck Ferry (404) 817-0107 or by email at chuck.ferry@amecfw.com.

Sincerely,

CC:

Amec Foster Wheeler Environment & Infrastructure, Inc.

Steve Davenport

Project Geologist

Senior Principal Engineer

Mr. Chris Faussemagne, Westbridge Partners

Mr. John C. Spinrad, Arnall Golden Gregory LLP

Tel: (404) 873 4761 Fax: (404) 817 0207 www.amecfw.com

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1.0 PROJECT SUMMARY

The 1071 Howell Mill Road Site ("Site") is an approximate 0.9-acre parcel of land located in Atlanta, Fulton County, Georgia. The Site is identified on the Fulton County Tax Assessor's website as Tax Parcel ID 17-0150-009-14. Historically, the Site was undeveloped from at least 1938 until it was developed in 1951 with a commercial building and a small parking lot west of the building. The building was vacated in 2010.

1.1 REGULATORY BACKGROUND

The Georgia Environmental Protection Division (EPD) notified the former property owner, Mr. William Graham, Jr., that the Site may have been impacted by the historical placement of contaminated fill material. As such, the Site has been the subject of a number of environmental assessments conducted between 2003 and 2012, which revealed the presence of metals in soil, including: arsenic, barium, cadmium, chromium, and lead. Based on the soil data obtained in 2003, the Site was sub-listed on the Hazardous Site Inventory (HSI) as part of the Welcome Years HSI Site No. 10637 located to the north. Adjoining commercial properties to the north, east and south have also been sub-listed as part of the Welcome Years HSI Site No. 10637.

Groundwater data obtained on-Site identified several chlorinated volatile organic compounds (VOCs) and the metals barium, cadmium, chromium and lead. The metals detected in groundwater were at low concentrations and are consistent with naturally occurring levels. The presence of the chlorinated VOCs are interpreted to be from an upgradient off-site source.

A Voluntary Remediation Plan Application (VRPA), dated September 7, 2012, was submitted to Georgia Environmental Protection Division (EPD) to enter the Site into the Voluntary Remediation Program (VRP). In conjunction with the VRPA, Westbridge Partners submitted a Prospective Purchaser Corrective Action Plan (PPCAP) dated September 17, 2012, to enter the Site into Georgia's Brownfield Program. The Georgia EPD approved both the VRPA and PPCAP with conditions and comments presented in separate letters dated October 15, 2012 and accepted the Site into the VRP and Georgia's Brownfield Program.

EPD requested in its October 15, 2012 approval letter that semi-annual status reports be submitted beginning April 15, 2013 through April 15, 2017, to include an annual groundwater monitoring program. Six semi-annual reports have been issued, the first of which included a Monitoring and Maintenance Plan (MMP) that set forth certain engineering controls. Based on an EPD comment letter dated August 5, 2014, an annual inspection of engineering controls must be

performed. In addition, site activities involving disturbance of impacted soils are performed under a Remediation Plan and an Environmental Management Plan (EMP).

1.2 REDEVELOPMENT PROJECT

1071 WB, LLC has engaged a contractor, Structor Group, to renovate the existing building. As shown on the attached Figure 1, the building on the southern half of the Site has been demolished and the area converted to a parking lot by overlaying asphalt on the remaining building floor slab as the pavement hardcover. The remaining building on the northern half of the Site has been gutted for renovation, re-using the existing building super-structure and floor slab. A restaurant is under construction at the western end of the existing building. The remainder of the building is currently being built out to house a veterinary clinic. Floor slab penetrations reported in the Sixth Progress Report observed have been filled. An additional concrete floor slab has been poured in the restaurant space as well as throughout the remainder of the building (Photos 3 and 4).

Stormwater control measures have included the installation of a trench drain in the parking area and the installation of an underground detention vault in the western portion of the property (Photo 2). A small area in the northwest corner of the property has been landscaped using borrow soil certified by testing in the Fifth Progress Report dated April 15, 2015 (Photo 1).

Currently, a temporary fence and locked gate has been installed along the Howell Mill Road side of the Site, with permanent fencing along the south side of the property. Temporary fencing along the east end of the property has been removed to allow for installation of a dog walk which will include a canopy and permanent fencing. In addition, a concrete slab will be poured over the existing slab in the dog walk area.

2.0 ACTIONS TAKEN SINCE LAST SUBMITTAL

Only building renovation activities have been performed since submittal of the Semi-Annual Progress Report #6 dated October 15, 2015.

2.1 LEASE SPACE PLUMBING

During our October 2015 inspection, penetrations of the existing floor slab inside the building for installation of subsurface plumbing for future tenant use were observed. The penetrations were not observed during our May 31, 2016 visit. According to Structor Group's site superintendent, the penetrations were backfilled with gravel following plumbing installation and topped with a four-inch thick concrete floor slab.

2.2 DOG WALK CONSTRUCTION

Portions of the concrete pavement at the east end of the Site have been saw-cut in preparation for installation of footings to support a canopy over a planned dog walk at the east exterior of the building. Temporary fencing in the area has also been removed and will be replaced after construction of the dog walk.

2.3 SLOPE COVER

Heavy vegetation has been removed from the slope at the east end of the Site. Spray-applied grout (gunite) has been placed as cover and for stabilization on the slope up to the property boundary.

3.0 ROUTINE INSPECTION

Mr. Steve Davenport of Amec Foster Wheeler visited the site on May 31, 2016 to conduct a routine Site inspection. The following conditions were observed as documented on the MMP checklist:

- The utility excavations in the building's interior have been filled and covered with a concrete slab.
- Saw cut concrete was observed at the west end of the building. Sections of concrete will be removed to allow for installation of footings to support a planned canopy. Additional concrete will be poured in the area to allow for installation of a dog walk. Fencing will be replaced during construction of the dog walk.
- Heavy vegetation on the slope at the east end of the Site has been removed and the slope gunited to the property boundary.

A copy of the Inspection and Maintenance Report is included in Appendix E. Photos of the interior of the building and the dog-walk area at the west end of the building are included in Appendix A.

4.0 SUMMARY

The EMP and Remediation Plan were initiated following the start of Site redevelopment activities.

The previously exposed soil in the plumbing trenches inside the building have been covered with gravel and a new concrete floor slab.

The slope at the east end of the property has been cleared and gunited to the property line. The cut concrete and exposed soil at the east end of the property will be covered with an additional concrete slab, installed during construction of a dog walk. Permanent fencing along the east side of the property will also be installed after construction of the dog walk.

Therefore, the Type 5 RRS cap remains intact, except at the location of the planned dog walk which is under construction. There is no plan to remove soils from the project site.

It is the intent of Westbridge Partners and 1071 WB, LLC to submit a Compliance Status Report (CSR) during the next progress report period in October 2016 that will be the final report submitted to EPD. This will include a final sampling event for monitoring wells MW-1R2 and MW-3R installed in September 2016 to evaluate VOCs in groundwater on the upgradient boundary of the Site.

A breakdown of professional service hours with a description of the services provided is included in Appendix F.

GROUNDWATER SCIENTIST STATEMENT

I certify that I am a qualified groundwater scientist or engineer who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training and experience in groundwater hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport. I further certify that this report was prepared in conjunction with others working under my direction.

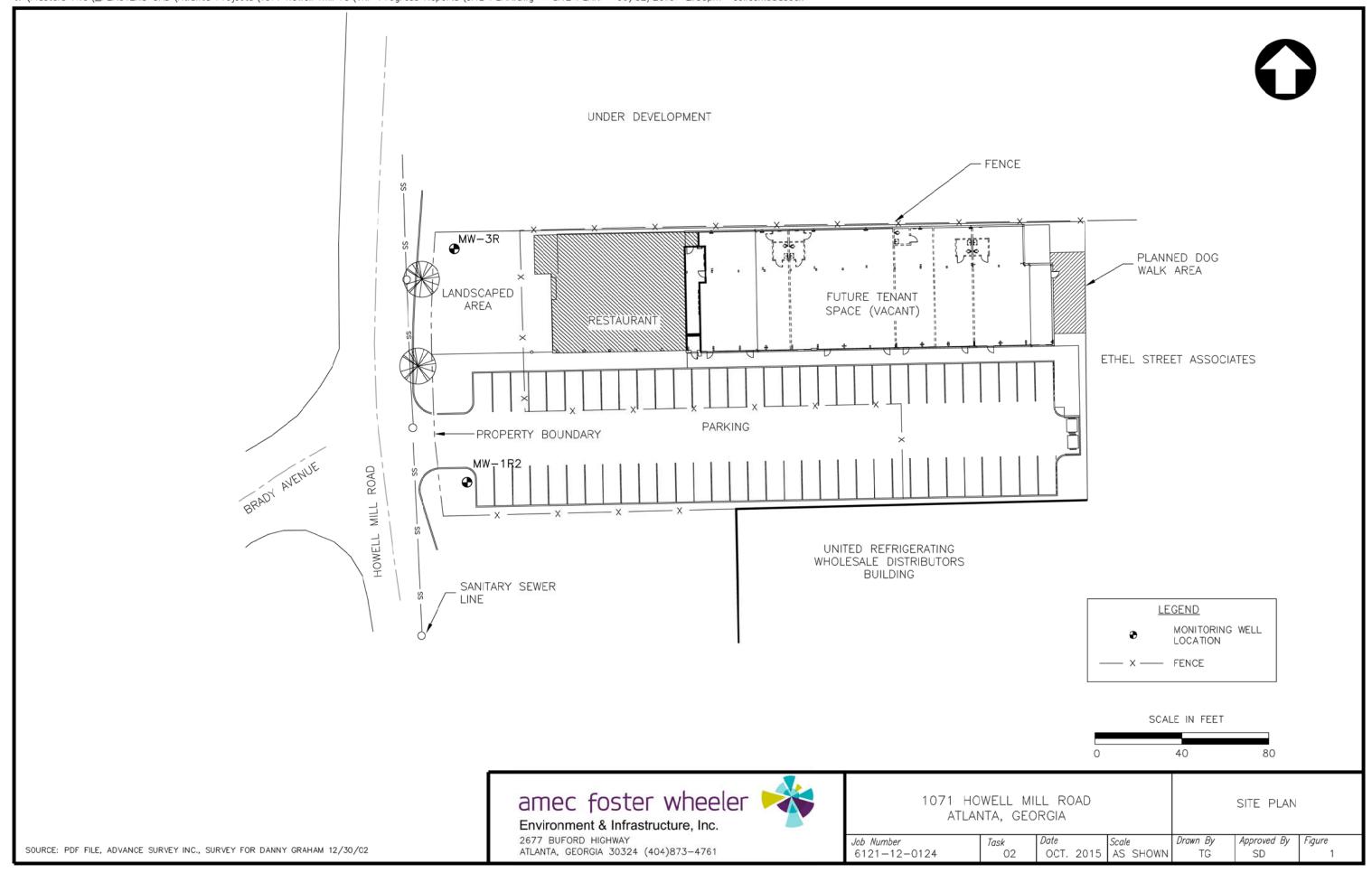
PROFESSIONAL

Mr. Charles T. Ferry, P.E.

Georgia Registration No. 10957







APPENDIX A
PHOTOGRAPHS





Photo 1. View north from southwest property corner.

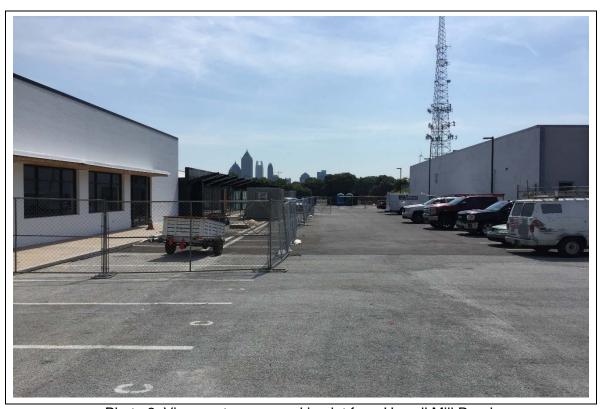


Photo 2. View east across parking lot from Howell Mill Road.



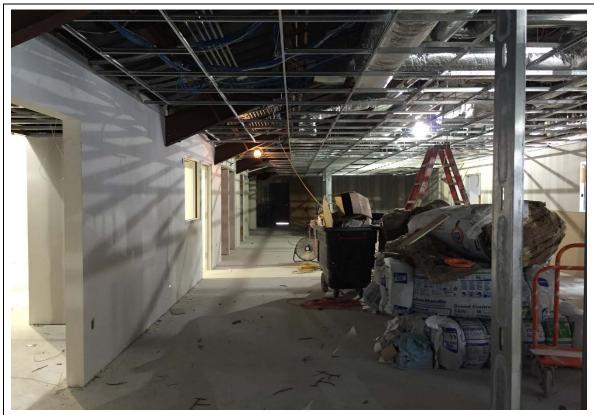


Photo 3. Interior of building looking east.



Photo 4. Interior of building (office).





Photo 5. View of saw-cut concrete, exposed soil, fencing gap and cleaned slope at east end of the property.

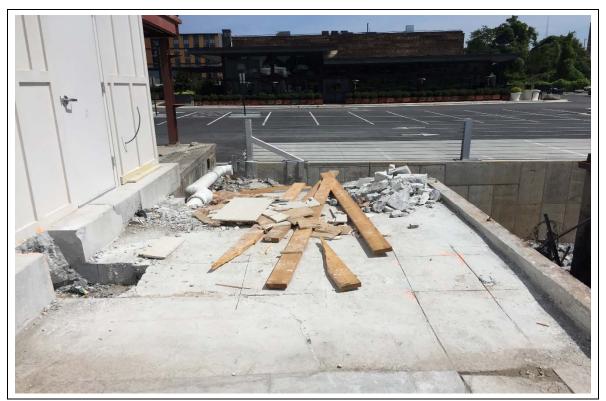


Photo 6. View of saw-cut concrete and fencing gap behind building at east end of site.

APPENDIX B INSPECTION AND MAINTENANCE REPORT

		1071 HO	WELL I	WILL R	OAD, / Mainte	HOWELL MILL ROAD, ATLANTA, GEORGIA Inspection and Maintenance Report	RGIA
	OBSER	OBSERVATION	00	CONDITION	Z		COMMENTS
INSPECTION ITEM	Yes	No	¥.	Z	₹		(Indicate Location)
TYPE 5 RRS COMPLIANCE							
						Concret concret support	Concrete slab penetrated behind building. Sections of concrete will be removed to allow installation of footings to support planned canopy. Additional concrete will be poured
Barrier Penetration Performed This Period	×					in area be repla	in area to allow for installation of a dog walk. Fencing will be replaced during construction of the dog walk.
						Heavy remove	Heavy vegetation on slope at east end of site has been removed and the slope gunited to the property boundary
Institutional Controls Maintained						Environmental	Environmental covenant to be filed upon completion of construction.
SURFICIAL BARRIER OBSERVATIONS							
Floor Slab	×		×			All interior hard cover has bee exposed soil areas observed.	All interior hard cover has been maintained or replaced. No interior exposed soil areas observed.
Pavement	×			×		Pavement at ea	Pavement at east end of property to be replaced.
Soil Barrier		×				No clean soil ba	No clean soil barrier has been breached.
OTHER OBSERVATIONS		×					
DATE OF INSPECTION		May 31	31, 2016			INSPECTOR	Steve Davenport
							(Print) Stue Covernort (Signature) With permission by: 16

Notes: NA - No Action Needed, MN - Maintenance Needed, IA - Immediate Attention Needed

APPENDIX C SUMMARY OF PROFESSIONAL HOURS

Charles T. Ferry, P.E.

Summary of Hours and Services During 7th Semi-Annual Progress Period Former Sunlow, Inc.

1071 Howell Mill Road, Atlanta, Georgia HSI Site No. 10637

Summary of Hours for Voluntary Remediation Program Activities

(1) Prepare May 2016 Semi-Annual VRP Progress Report 3 hours invoiced between 10/16/15 and 6/1/16