

REPORT

**Corrective Action Plan, (CAP)
Revision No. 1**

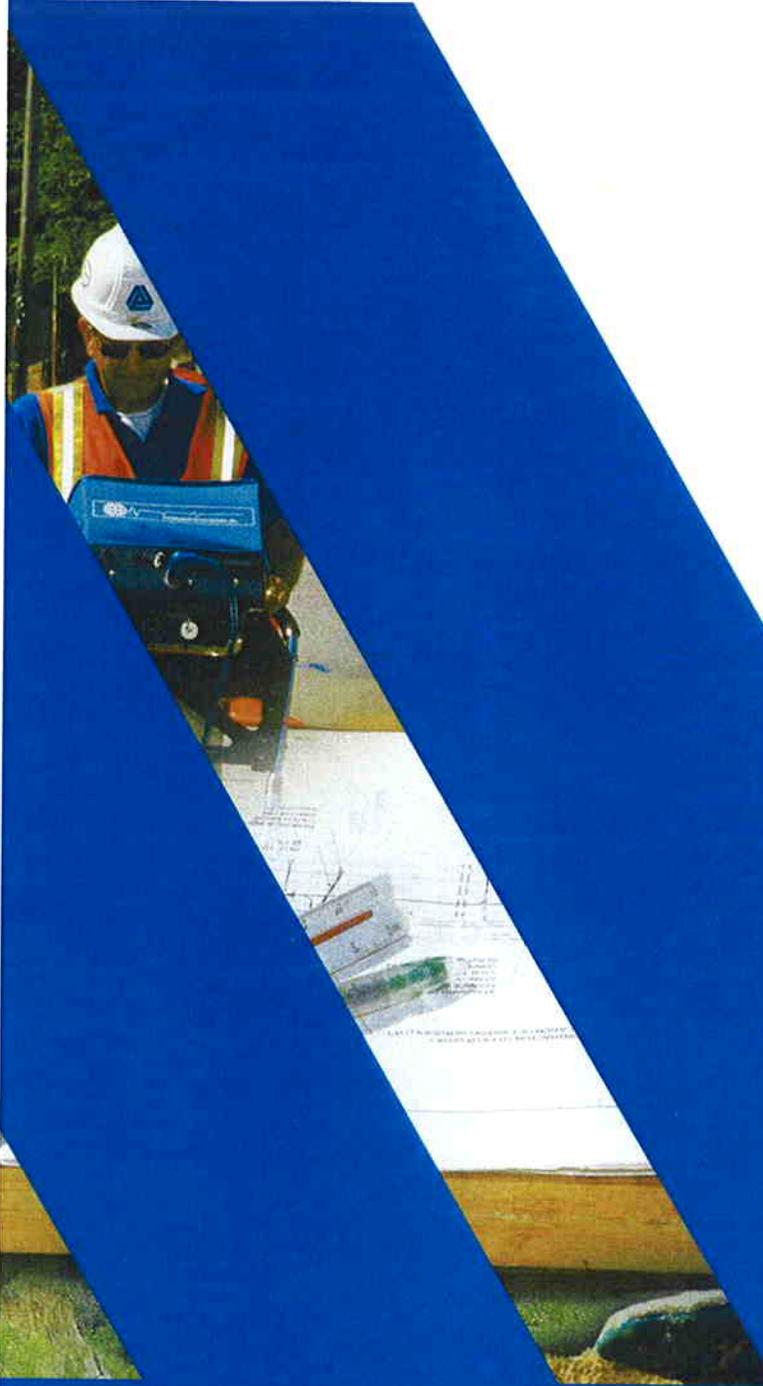
**Iron Works International Inc.
1085 Howell Mill Road
Atlanta
Fulton County, Georgia
Welcome Years
HSI No. 10637**

**Project Number
97.0826.08**

August 13, 2008



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August 13, 2008

Mr. David Reuland
Hazardous Site Response Program
Environmental Protection Division
Department of Natural Resources
2 Martin Luther King, Jr. Drive, SE, Suite 1462
Atlanta, Georgia 30334

RE: Corrective Action Plan (CAP)-Revision No. 1
Iron Works International Inc.
1085 Howell Mill Road
Atlanta, Fulton County, Georgia
Welcome Years HSI No. 10637
Project No. 97.0826.08

Dear Mr. Reuland:

Please find enclosed the revised Corrective Action Plan (CAP) for the Iron Works International Inc. facility (hereinafter referred to as IWI or Project Site). The original CAP was dated July 20, 2006. This revised CAP is based on the Environmental Protection Division's (EPDs) CAP Comment Letter dated September 25, 2006 and subsequent telephone communications between United Consulting and EPD personnel on October 26, 2006. The elapsed time period between the comment letter and this revised document was a result of the EPDs internal legal review of the restrictive covenant provided in the original CAP. EPD's final legal comments to the restrictive covenant were provided in July 2008. This revised CAP addresses the comments provided by the EPD.

We hope that this revised document addresses the EPDs comments and that the CAP approval is forthcoming. If you have any questions or need additional information, please call: John Clerici - 770-582-2819, or Russ Griebel - 770-582-2788.

Sincerely,

UNITED CONSULTING

Russell C. Griebel, P.G., R.B.P.
Associate Environmental Specialist

John F. Clerici, P.E.
Chief Environmental Consultant

RCG/JFC/ljr

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c: Mr. Angelo Viale
Mr. Clinton T. Cole, Hartman, Simons, Spielman & Wood, LLP

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August 13, 2008
Corrective Action Plan (CAP)-Revision No. 1
Iron-Works International Inc.
1085 Howell Mill Road
Atlanta, Fulton County, Georgia
Welcome Years HSI No. 10637
Project No. 97.0826.05

GROUNDWATER SCIENTIST STATEMENT

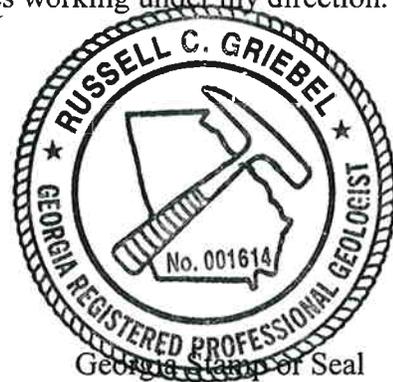
I certify that I am a qualified groundwater scientist who has a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training and experience in groundwater hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport. I further certify that this Corrective Action Plan for the Iron Works International Inc. property located at the address of 1085 Howell Mill Road in Atlanta, Fulton County, Georgia (part of the Welcome Years HSI No. 10637 Site) was prepared by myself and appropriate qualified subordinates working under my direction.

UNITED CONSULTING

Name: Russell C. Griebel, P.G., R.B.P

Signature:  _____

Date: August 13, 2008



GENERAL BACKGROUND

Iron Works International Inc. is located at 1085 Howell Mill Road in Atlanta, Fulton County, Georgia (IWI or the Project Site). The Project Site was purchased by Mr. Angelo Viale in 1997. Prior to his purchase, Mr. Viale had a Phase I Environmental Assessment completed on the property, which resulted in a Phase II Environmental Assessment recommendation for general assessment of potential off-site impact sources. The Phase I Environmental Assessment did not indicate any concerns related to lead in the soil. The Phase II Environmental Assessment did not identify impacts. At that time of purchase, the Project Site grade was in a condition similar to today, with the exception of a concrete cover, which has been placed across the entire Project Site. The general location of the Project Site is illustrated on Figure 1.

The property adjacent to the Project Site was placed on the Hazardous Site Inventory (HSI) HSI Site No. 10637 in mid-May 2000, due to identified lead and barium impacts exceeding reportable quantities under the Rules¹. As part of the extent assessment of impacts detected at the adjacent Welcome Years Facility, investigations were undertaken at the Project Site in April 2002. Those investigations detected lead and barium on the Project Site. In a July 9, 2002 letter, the Georgia Environmental Protection Division (EPD) indicated that the Project Site was part of the HSI Site No. 10637, and IWI was instructed to prepare a Compliance Status Report (CSR) for its property. United Consulting provided a response to the EPD's July 9, 2002 letter, in a report dated September 4, 2002. A meeting was then held at the EPD on September 30, 2002 to address IWI's position. As a result of that meeting, IWI agreed to provide a CSR for its property. In turn, United Consulting conducted significant subsurface investigations across the Project Site and prepared a CSR, report dated February 14, 2003. The CSR was subsequently revised twice, based on comments received from the EPD in a letter dated September 16, 2005 and from comments received during a telephone conference on February 13, 2006. The revised CSR documents were dated December 13, 2005 and February 20, 2006, respectively.

The EPD issued a letter of Concurrence with CSR, dated March 31, 2006. That letter concurred that the soils at the Project Site do not meet the Type 1 through Type 4 Risk Reduction Standards (RRSs). The Project Site was then reclassified by the EPD from a Class II to a Class I site, which requires corrective actions be taken at the site. The letter requested a Corrective Action Plan (CAP) be submitted to the EPD by June 22, 2006.

A request for an extension to the above EPD CAP due date were requested and subsequently approved by the EPD. In turn, a CAP was submitted to the EPD on July 20, 2006. The EPD issued a CAP Comment Letter dated September 25, 2006. The elapsed time period between the comment letter and this revised document was a result of the EPDs internal legal review of the restrictive covenant provided in the original CAP. EPDs legal comments to the restrictive covenant were provided in January 2008. This revised CAP addresses the comments provided by the EPD.

¹ Rules of Department of Natural Resources, Environmental Protection Division, Chapter 391-3-19, Hazardous Site Response.



SITE USE

The Project Site is currently developed with the IWI facility. This includes the fabrication facility, storage areas, show room, and offices. As such, one proposed use of the property is to continue the current commercial operations being conducted at the site. However, other commercial and/or industrial uses at the site may be implemented in the future.

The area of the Project Site is in a rapidly developing portion of Atlanta. Previous property usage in this area was predominantly commercial/industrial in nature. However, due to growth within the City limits, residential developments have spread to this area. As such, with its proximity to downtown and numerous colleges, the Project Site is a prime residential site. Therefore, residential use at the Project Site may also be implemented in the future, and it is the intent of this CAP to allow for this type of redevelopment.

As indicated herein, the soils at the Project Site do not meet Type 1 through Type 4 RRS. Achieving these standards for commercial/industrial or residential uses is not feasible, as indicated below. Therefore, Type 5 standards are being applied. United Consulting believes due to the nature of the chemicals of concern (COC) at the Project Site, that with proper site control and restrictive covenant, exposure to the COC can be adequately limited to be protective of human health and the environment.

RISK REDUCTION STANDARDS

In the EPD' CAP Comment Letter, dated September 25, 2006, the EPD did not fully agree with United Consulting's opinion with regard to the calculated Types 1 through 4 RRS. However, in a telephone conversation on October 26, 2006, EPD personnel specifically indicated that this information did not need to be revised in the CAP and that this information would not have an effect on the outcome/approval of this CAP. However, as requested in the comment letter, the verbiage relative to criteria for Type 5 RRS has been revised below, specifically in relation to both carcinogenic and non-carcinogenic compounds. The constituents detected at the Project Site above the documented background concentrations, as outlined in the February 20, 2006 Revised CSR, included; lead, barium, arsenic, and cadmium.

Approach

As required in the March 31, 2006 EPD letter, Type 1 through Type 4 RRS calculations have been made for the primary COC at the Project Site, lead, in order to aid in assessing feasibility for remedial actions at the site to meet these RRS. RRS were only required for this constituent as indicated in the March 31, 2006 letter. The high concentrations of lead at the Project Site do not meet any of the Type 1 through Type 4 RRS. Type 5 RRS were also assessed for the Project Site.

The RRS were developed based on guidance and the Rules for the HSRP, as well as applicable guidance from the United States Environmental Protection Agency (EPA) (1991, 2001). The RRS values calculated in this report incorporate standard, default assumptions recommended by



EPD and EPA, as appropriate. The RRS calculation requirements are provided in the Rules, under section 391-3-19-.07.

Type 1 RRS

The Type 1 RRS for lead was obtained from Table 2 of Appendix III of the Rules. The Type 1 RRS for lead is 75 milligram per kilogram (mg/kg). Table 2 from the Rules is included in Appendix A of this report.

Type 2 RRS

Type 2 RRS for lead was assessed by calculating equation 4-10 of the Supplemental Guidance for Soil Screening Levels for Superfund Sites (SGDSSL) and running the Integrated Exposure Uptake Biokinetic Model for Lead in Children (IBEUK) model. The final Type 2 RRS is the lower of these two concentrations.

Equation 4-10 of the SGDSSL was run using EPA default values, including an EPA default K_d value of 900 liters per kilogram (L/kg) (from Oak Ridge), as provided by the EPD Risk Unit. Since the distribution of the lead impacts at the Project Site consist of more than 0.5 acres, and for purposes of this assessment, a default dilution attenuation factor (DAF) of 1 was used.

Equation 4-10:

$$SSL = C_w [K_d + (O_w + O_a(H)/P_b)]$$

Where:

SSL	Soil Screening Level	mg/kg
C_w	Target Soil Leachate Concentration	0.015 mg/L-Chemical Specific
K_d	Soil-Water Partition Coefficient	900 L/kg-Default
O_w	Water Filled Soil Porosity	0.3 L/L-Default
O_a	Air Filled Soil Porosity	0.134 L/L ($n - O_w$)
n	Soil Porosity	0.434 L/L ($1 - P_b/P_s$)
P_b	Dry Soil Bulk Density	1.5 kg/L-Default
P_s	Soil Particle Density	2.65 kg/L-Default
H	Dimensionless Henry's Constant	0

So:

$$SSL = 0.015 \text{ mg/L} [900 \text{ L/kg} + (0.3 \text{ L/L} + 0.134 \text{ L/L}(0)) / 1.5 \text{ kg/L}]$$

$$SSL = 13.5 \text{ mg/kg}$$

The IBEUK model was run using site specific data and EPA default values. A groundwater sample from the site did not show lead above the laboratory detection limit of 0.01 milligrams per liter (mg/L). Discussions with the lab also indicated that lead was not present below this



concentration. In the model, as a conservative approach, a concentration of 10 micrograms per liter (ug/L) was used (the EPA default is 4). Using this data and EPA defaults, a concentration of 290 mg/kg was determined to have a probability of no greater than 5% of a blood level greater than 10 ug/dL. The IBEUK model is included in Appendix A.

Based on these calculations, the final Type 2 RRS is 13.5 mg/kg.

Type 3 RRS

Based on the HSRA Rules, the Type 3 RRS for lead is 400 mg/kg.

Type 4 RRS

Type 4 RRS for lead was assessed by calculating equation 4-10 of the Supplemental Guidance for Soil Screening Levels for Superfund Sites (SGDSSL) and running the Georgia Adult Lead Model (GALM). The final Type 4 RRS is the lower of these two concentrations.

The GALM involves two equations, with the first equations being a parameter of the second. The model was run using the EPD default values from Table 1 of Appendix IV of the Rules. This table is included in Appendix A. The concentrations of lead in groundwater at the site was considered equal to the Type 4 groundwater RRS, 15 ug/L.

Equation 1 for lead in blood:

$$PbB = PbB_{fetal}/R * GSD^{1.645}$$

Equation 2 for the concentration in soil:

$$C_s = [PbB - PbB_{fetal}/BSF * (E/AT) - (C_w * I_w * A_w)] [I_s * A_s]^{-1}$$

So:

$$PbB = 10 \text{ ug/dL} / 0.9 * 2.04^{1.645} = 3.439 \text{ ug/dL}$$

$$C_s = [3.439 \text{ ug/dL} - 1.38 \text{ ug/dL} / 0.4 * (219 \text{ days/yr} / 365 \text{ days/yr}) - (15 \text{ ug/L} * 1 \text{ L/day} * 0.2)] [0.05 \text{ g/day} * 80.12]$$

$$C_s = 930 \text{ mg/Kg}$$

As indicated in the Type 2 RRS section above, the groundwater protection concentration at the Project Site is 13.5 mg/kg.

Therefore, based on these calculations, the final Type 4 RRS is 13.5 mg/kg.

Type 5 RRS

As defined below, Type 1 through Type 4 RRS are not feasible for the impacts at the Project Site. Therefore, as outlined in the Rules, section 391-3-19-.07(10)(a), Type 5 RRSs are



applicable for the Project Site. Following is a general discussion of the Type 5 RRS requirements per the Rules, as noted in Section 391-3-19-.07(10), and their specific relation to the conditions at the Project Site. **Further details on the implementation of the Type 5 RRS at the Project Site are included under the Corrective Action section and other relevant sections, below.**

(a) Allow for use of measures to control regulated substances on site, such as fencing, capping, or stabilization, with removal or treatment where appropriate to remove principal threats. The owner must demonstrate that the actions eliminate or abate present and future threats to human health and the environment (HHAEE).

Impacts at the Project Site are widespread and extend to significant depths. Human exposure at the site will be limited through the use of a cover or cap, either as a layer of concrete or a building covering the impacted soils at the Project Site.

(b) Long term monitoring and maintenance is required (as appropriate) for all implemented remedial measures, with a restrictive covenant.

A long term monitoring program will be implemented at the site to ensure the continued existence of protective measures. The owner and subsequent property owners will review conditions at the site and maintain the cover over impacted soil. A restrictive covenant has been prepared in conjunction with this CAP to allow various potential uses at the Project Site. The long term monitoring plan is included in Appendix B and the restrictive covenant is included in Appendix C.

(c) Type 1, 2, 3, and 4 RRS must be met where applicable beyond the boundary of the Type 5 RRS area.

As noted above, impacts to soils at the Project Site are widespread and extend to significant depths. Therefore, the Type 5 RRS will be applied to the entire Project Site, from property line to property line. The entire area will have cover placed to restrict exposures to impacted soils. Other surrounding property owners will be responsible for meeting the RRS on their properties, as appropriate. Future owners of the property must maintain the cap and follow the actions set forward in this CAP for site improvements.

(d) Measures must prevent exposures: to carcinogens to 10^{-5} risk, to toxicants to applicable lifetime dose, to air to standards for NESHAP and NAAQ, to GW to Type 1 to 4 RRS as applicable, and to soil beyond the control area to Type 1 to 4 RRS.

The compounds at the Project Site include both carcinogenic and non-carcinogenic compounds. Exposure routes include: inhalation, ingestion, skin contact, and eye contact. For systemic toxicants, the corrective action methods at the site will be implemented to prevent exposures that exceed the dose to which the human population could be exposed on a daily basis without appreciable risk of deleterious effect during a lifetime. For carcinogens, the corrective action methods at the site will be implemented to prevent exposures that exceed the upper bound on an estimated excess cancer risk of 10^{-5} for individual carcinogenic substances and individual



exposure pathways and not greater than 10^{-5} for cumulative excess risk for multiple carcinogenic substances.

The Type 5 RRS shall be applied to the entire Project Site, so soil corrective actions relative to Type 1 through Type 4 RRS is not applicable. Potential contact and ingestion exposures will be limited to the few occasions when utility and/or foundation construction and/or maintenance occur at the Project Site. However, all efforts will be undertaken to minimize potential worker and general population exposure during these activities. Otherwise the site will be permanently covered with a cap. Air emissions from the contamination will be controlled with the cap at the Project Site and the negligible volatility of lead.

The EPDs CAP Comment Letter indicated that insufficient site data is available for certify compliance of groundwater with the Type 1 RRS. As indicated in the CSR, in United Consulting's opinion, the lack of metals groundwater impacts at the Project Site has been demonstrated through various total and dissolved analyses. Re-sampling of MW-3 is not possible, as it is believed to be below about 2 to 4 feet of concrete, which was placed for the construction of a new building. Further, as verbally communicated with the EPD, due to the difficult and heterogeneous conditions of the subsurface at the site, United Consulting does not believe that it is technically possible to install a new well in this area to collect quality data.

Since receipt of the EPD CAP Comment Letter, additional groundwater sampling has been conducted at other properties comprising this HSI Site. Specifically, at the 675 Ethel Street property, which is down-gradient from the Project Site, analytical testing has not indicated the presence of total metals above background conditions. Lead was below the laboratory detection limit of 0.01 milligrams per liter (mg/L). With this data from other parts of this HSI site, the EPD indicated it would not require additional investigations, including monitoring, relative to groundwater at the Project Site at this time. Further, based on this data, and conversations with EPD personnel, groundwater at the Project Site can be certified to be in compliance with Type 1 RRS. As such, this, and any other new data, will be used to certify groundwater compliance in the final CSR. A copy of the analytical testing results from the 675 Ethel Street property, which were provided in an Interim Groundwater Results letter dated November 6, 2006, are included in Appendix D.

SOIL RRS FEASIBILITY

As indicated in the EPD' CAP Comment Letter, dated September 25, 2006, the EPD is in agreement that Type 5 RRS for soil are appropriate for the Project Site. This agreement was based on the technical impracticality of a Type 1-4 RRS remedial effort. This impracticality is due to the depth and widespread nature of impacts, the heterogeneity of the distribution of impacts, and the current above ground improvements at the Project Site. Although the EPD may not have fully agreed with United Consulting's opinion with regard to the calculated Types 1 through 4 RRS, associated cost estimate, or limitations, the EPD specifically indicated in a telephone conversation on October 26, 2006 that this information did not need to be revised and that this information would not have an effect on the outcome/approval of this CAP.



Approach

As indicated in the RRS Section above, groundwater at the Project Site is in compliance with Type 1 RRS. United Consulting has assessed the feasibility of achieving the Types 1 through Type 4 RRS for soils at the Project Site. This was required by the EPD to permit the implementation of Type 5 RRS at the Project Site. First, soil volumes for removal at the site were assessed. Then comparison was made to these volumes and associated removal and disposal costs. Finally, the overall impact of the removal operations was assessed.

Impact Extent

Research had been previously been conducted to determine potential sources and extents of fill materials. Based on that research, it was determined that a valley was formerly present on the Project Site. This valley began near the southwestern corner of the Project Site and continued in a northeastern direction continuing off site. The area of fill placement was quite large, encompassing about 6.8 acres, and it extended onto properties to the north, east, and south of the Project Site. The area of fill placement on the Project Site is estimated to be 1.3 acres. The fill materials were apparently placed between 1938 and 1968. The impacted fill materials on the Project Site generally consist of black stained soils with high concentrations of slag materials. Such materials are waste products commonly associated with the manufacturing of metals, such as from smelting, foundries or refining operations. Three such companies were formerly present in the area of the Project Site and included National Smelting of New Jersey, Inc., 451 Bishop Street N.W., The National Smelting and Refining Company, Inc., 430 Bishop Street N.W., and Atlantic Steel Corporation. National Smelting of New Jersey, Inc. and The National Smelting and Refining Company, Inc. were located approximately 4,000 feet to the northeast of the Project Site. Atlantic Steel was located approximately 5,000 feet to the northeast of the Project Site.

The distribution of lead impacts at the Project Site was erratic, with some apparent slag materials having elevated lead concentrations and others low or no concentrations. Further, the concentrations of the impacts did not convey vertical trends, neither increasing nor decreasing with depth. Therefore, for a removal remediation approach, segregation could likely not effectively be conducted, and all potentially impacted soils would require removal. This could result in the removal of all soil to the groundwater table over much of the Project Site.

Based on the results of investigations conducted at the Project Site for the generation of the CSR, fill materials are present across the entire Project Site with thicknesses ranging from approximately 3 to about 40 feet. However, the fill material of concern for this assessment, stained industrial fill with slag materials which have lead impacts greater than its RRS, is generally limited to the southeastern 1/3 of the Project Site (relative to commercial/industrial RRS), but extends off-site to the northeast, east and south of the Project Site. Areas greater than this have lead concentrations exceeding the residential RRS.

Lead impacts were the most significant impacts detected at the Project Site, both in concentration and in extent, and covered approximately 1/3 of the general southeastern portion of the Project Site. The extent of lead impacts was identified with soil samples to the northwest and southeast



on the Project Site. Lead impacts apparently extend off-site to the north, east, and south of the Project Site, onto all adjoining properties. Lead was detected by others on the properties to the north and east of the Project Site prior to United Consulting's investigations for the CSR. Due to site limitations, including utility density and the reported presence of a 3 to 5 foot thick concrete slab in the area, soil samples could not be obtained to the west of the southwestern portion of the Project Site. Thus, sampling to identify lead extent impacts could not be performed in that area. However, based on historic topographic maps reviewed, Howell Mill Road appears to be constructed on residual soils. Therefore, Howell Mill Road is believed to be the western extent of the impacted materials in this area.

The fill materials encountered varied in nature and consistency. This is particularly true in the vertical profile, due likely to different fill periods. Fill materials are present across virtually the entire Project Site, with thicknesses ranging from approximately 3 to about 40 feet. Samples were obtained for analytical testing as described in the CSR. Vertical impacts were estimated from samples submitted for analytical testing with impact detections and/or vertical observations. Based on the comparison of historic topographic maps, up to about 30 feet of fill material is present at the Project Site. This was generally consistent (within the anticipated accuracy of such maps) with the range of the fill materials encountered in the borings drilled at the Project Site, so the map data was used to assist in the vertical delineation in some areas.

Impacts were confined to fill materials with staining and/or concentrations of slag materials. However, numerous samples were obtained from these soils where no impacts were detected. This is consistent with the erratic conditions described above. The highest concentration of lead detected at the Project Site was within boring B-2 at 3.5 to 5 feet bgs. The shallowest impacts detected at the Project Site were at boring B-18 at 1 foot bgs. The deepest impacts were detected at borings B-1 and B-6A at 19 to 21 feet bgs. All of these were from fill, above the residual soil. Two soil samples were obtained from stained fill materials from below the groundwater table for analytical testing. No impacts were detected in these samples. Three residual soil samples were obtained for analytical testing from below stained fill and/or slag materials in three separate areas. These samples were also from below the groundwater table. No impacts were detected in these samples. Based on the results of the analytical testing, the vertical extents of impacts were erratic and difficult to determine. However, the impacts appear to remain within the fill materials and above the groundwater table, which was about 24 to 25 feet bgs. Groundwater was not impacted.

Table 1 summarizes the results of the soil analytical testing and Table 2 summarizes information on vertical delineation. Also included in Table 2 are depths of stained soils and slag materials, depths of borings, estimated depth of residual soils, depth of auger refusal, and depths to groundwater. Figure 3 shows the locations for soil cross-sections A-A', B-B', C-C', and D-D'. Figures 4 and 5 present these soil cross-sections.

Volume Calculations

Based on the RRS, the greatest concentration of lead permitted at the site for residential and commercial/industrial uses was 75 and 400 mg/kg, respectively. The following analysis focused on the removal to the commercial/industrial standards. Additional removal would be required to



meet the residential standards. Therefore, since removal to the commercial/industrial standards is not feasible, as described below, additional estimates for residential standards were not justified.

The above data was used to calculate an approximate volume of soils with impacts at concentrations greater than the residential and commercial RRS. Cross-sections and soil concentrations maps were initially used to segregate the areas with lead impacts, which would require removal to meet the RRS. From that, three separate areas were created, A, B, and C, with varying depths of excavation to meet the 400 mg/kg commercial/industrial standard. However, as indicated above, segregation for a removal action would not be possible and the impact distribution is erratic, so areas for impact removal would likely be significantly greater than the estimated volume. The approximate depths of the excavations were 20, 25, and 35 feet. These three areas are illustrated on Figure 2. Following are calculations demonstrating a potential volume of soil for removal at the site:

Area A: $215 \text{ ft} * 55 \text{ ft} * 20 \text{ ft} = 236,500 \text{ ft}^3$

Area B: $110 \text{ ft} * 55 \text{ ft} * 25 \text{ ft} = 151,250 \text{ ft}^3$

Area C: $115 \text{ ft} * 100 \text{ ft} * 35 \text{ ft} = 402,500 \text{ ft}^3$

TOTAL = $790,250 \text{ ft}^3 / 27 \text{ ft}/\text{yd}^3 = 29,270 \text{ yd}^3 * 1.6 \text{ tons}/\text{yd}^3 = 46,830 \text{ tons (T)}$

Total tonnage of material for treatment and disposal as non-hazardous waste was estimated at about 37,500 tons. Although the actual percentage is unknown at this time, based on the known distribution of the concentrations present, twenty percent of the total tonnage, about 9,400 tons, was estimated as material requiring disposal as hazardous wastes. Again, this was due to the presence of high lead concentrations in the slag materials.

Corrective Action Costs

The above calculated volume was used to estimate the cost for removal and disposal of the impacted soils. Costs were then assessed for the overall impact of the removal action itself. Greenleaf Environmental Group (Greenleaf) was contacted for a general cost estimate for each of the initial 5 items below. Other items were based on past experiences with similar sites. Following is a summary of potential items/costs to meet the commercial/industrial standard.

Excavation, Treatment, and Disposal (non-hazardous)	\$4,680,000.00
Excavation and Disposal (Hazardous)	\$2,810,000.00
On-site Building Underpinning/Sheet Piling (300 linear feet (lf))	\$507,000.00
Property Line Sheet Piling (500 lf)	\$844,000.00
Backfill	\$850,000.00
Facility Relocation	\$100,000.00
Site Preparation for Staging	\$50,000.00
Engineering/Legal Costs	\$100,000.00
TOTAL	\$9,941,000.00



Greenleaf's cost estimate is provided in Appendix E. Greenleaf's written estimate did not include costs for disposal of hazardous materials, rather this estimated cost was provided by them verbally at \$250.00 to \$300.00 per ton.

Limitations of Removal Action

Although the above cost can be estimated, the removal action at the site would be limited by the following conditions and cost would be required to address each of these items also:

- Stained soils and/or slag material extended below the groundwater table. If excavation below that depth were required, dewatering would be needed for the excavation;
- To reach the total excavation depths, the excavation would need to be sloped or braced against collapse;
- Excavation would expose soils to a higher infiltration rate, which may lead to the introduction of leaching concentrations to groundwater;
- There is limited space for the removal action;
- Soils may need to be placed on adjacent properties for staging;
- Lateral excavation limits bound by properties with impacts, which results in need for sheet piling;
- Concentrations greater than standards may remain below existing on-site buildings;
- The facility would need to be vacated, causing a loss of income for property owner;
- The on-site building and storage structures could be damaged during these actions;
- Transportation of this large of a volume of impacted soil could likely result in a vehicle accident with a resulting environmental release incident;
- Without full remedial action on adjacent properties, the site could be re-impacted by their releases; and
- Other properties would have remaining concentrations of COC greater than the appropriate RRS.

Feasibility Conclusion

Cost for removal of impacted soil alone significantly exceeds market value of the Project Site. In United Consulting's opinion, also taking into account the aforementioned limitations of the removal actions as discussed above, and such an approach is infeasible. Further, as agreed by the EPD in their September 25, 2006 CAP Comment Letter, the Type 5 RRS for soil are appropriate for the Project Site due to the technical impracticality of a Type 1-4 RRS remedial effort.



CORRECTIVE ACTION PLAN

Approach

Type 5 RRS are being implemented at the Project Site and the corrective actions required at the Project Site to meet this RRS may vary based on the proposed property use, planned construction, and with the passing of time. As indicated above, property uses at the Project Site will at a minimum include the ongoing commercial operations of IWI. Other potential commercial/industrial uses could be implemented as well as potential residential uses. This could include mixed use development.

The controls for the corrective action will be implemented through both engineering controls and institutional controls. Engineering controls will include primarily the CAP, cap and buildings. Institutional controls will be implemented through the affidavit and monitoring, which are discussed in further detail below.

The CAP describes procedures to open the cover, perform construction on the Project Site, and maintain the cover integrity. The cover or cap is the key protection for the Project Site. It prevents soil disturbance and both contact and ingestion exposures. It also restricts infiltration and promotes runoff to protect the underlying groundwater system. The affidavit and monitoring programs are the measures to keep the cap in-place and functioning as desired. Other controls are developed through these.

Following is a listing of the required actions at the Project Site to meet the Type 5 RRS, per the Rules in section 391-3-19-.07(10). Each potential use of the Project Site is provided below each requirement. Specific details relative to the corrective action measure for each are described in detail per section, as applicable. Since details of future developments at the Project Site are unknown at this time, only general details for corrective actions can be outlined for those uses. In this instance, for new construction (excluding the current owner establishing new buildings without disrupting the cap — as previously discussed with EPD), a modified CAP will be submitted to the EPD for approval prior to site activities. Several components of CAP would be unchanged for each use.

Measures

(a) Allow for use of measures to control regulated substances on site, such as fencing, capping, or stabilization, with removal or treatment where appropriate to remove principal threats. The owner must demonstrate that the actions eliminate or abate present and future threats to human health and the environment (HHAE).

Impacts at the Project Site are widespread, and extend to significant depths. Regardless of the development at the Project Site, human exposure will mainly be limited through the use of a cap and structures.



Continued Operation of IWI

Although lead is known to exist at concentrations greater than its Type 1 through 4 RRS, and other metals are present at concentrations greater than their respective notification concentrations (NCs), the potential for human exposure to these chemicals is limited at the Project Site. Since purchase of the Project Site in 1997, Mr. Viale had the Project Site covered with a concrete cap, which limits any exposure to the soil release on the Project Site itself. This concrete was poured with left over batches from a nearby concrete company. Therefore, the concrete thickness varies across the Project Site. Based on the subsurface borings drilled at the Project Site, the concrete varies in thickness from approximately 2 to greater than 12 inches (the concrete could not be penetrated at boring B-13). In addition, the property owner indicated the concrete is up to 3 to 5 feet thick, in some areas.

The Project Site is thought to be entirely covered with a concrete cap (see below). The Project Site is also entirely surrounded by a 5 to 8-foot tall fence with two gated entrances. These gates are locked at night. This fence limits the access to the Project Site.

The existing concrete cap at the Project Site currently limits human exposure to direct contact with the impacted soils. This cap also limits surface water infiltration, which could result leaching of impacts from the soils and into the underlying groundwater system.

A registered land surveyor will survey the limits of the Project Site, site buildings, concrete cover, and site fencing. This will be conducted to document the extent of the concrete cap. If the cap does not entirely cover the Project Site, or concrete deterioration is observed in areas, additional concrete will be added in the uncovered areas. This will include a minimum of 6 inches of concrete cover, to the new/deteriorated areas.

As outlined in the restrictive covenant, a permanent marker will be installed and maintained on each side of the Project Site, delineating the restricted area. For the current construction, this will include installing a metal sign, or other similar monument, on the fence along each property line. *Photographs of the signage will be provided in the revised CSR.*

New Construction (Commercial/Industrial and/or Residential)

General

For any type of new construction at the Project Site, either residential and/or commercial/industrial, disturbance to the existing concrete cap and soil excavation will likely be required. As such, measures must be taken to minimize exposure and control contaminated media during site preparation activities. Documentation of the site activities will be conducted, and provided to the EPD, as appropriate.



Following are general details pertaining to potential site preparation/excavation operations. Once specific construction details are available for the various site usages, a modified CAP will be submitted to the EPD for approval prior to site activities.

As indicated above and in the CSR, about 2 to 4 feet of concrete was placed over well MW-3 during the construction of a building. During recent site maintenance, monitoring wells EMW-1 and EMW-2 have also been covered with concrete. In both instances, this coverage was accidental by the site owner. As part of any new construction activities that will disturb the existing cover, procedures will be implemented to ensure that the wells are located and properly abandoned to ensure that vertical conduits are limited for impact migration.

For future construction, as outlined in the restrictive covenant, a permanent marker will be installed and maintained on each side of the Project Site, delineating the restricted area. The type of permanent marker used will be dependent upon the planned construction.

Site Preparation/Excavation

Excavation

Soil removal, if necessary for foundations, utilities, and other subsurface activities, will be performed in accordance with this CAP. Excavation activities will be performed by contractors experienced, trained, and licensed for hazardous waste activities, as appropriate. During the excavation activities, soil with impacts will be slightly wetted to reduce dust generation. The materials removed from the Project Site will be transported by experienced, trained, and licensed waste haulers. The materials will have manifests prepared to document their removal and disposal. Materials including, but not limited to, the concrete cap, building demolition debris, soils and/or groundwater, may require special handling and disposal. Proper characterization of the materials for disposal will be made. All excavation, handling, containerization, transport, storage, and disposal activities will be performed by methods that:

- Prevent contamination of the surrounding environment (soil, water, air);
- Are in accordance with applicable federal, state and local regulation and laws; and
- Protect personnel in the work area and adjacent to the work area.

The work will be performed in compliance with applicable United States Occupational Safety and Health (OSHA) regulations, and in accordance with a project specific Health And Safety Plan.

Any future construction activities on the Project Site will include methods for segregating rainfall runoff. The goal is to minimize runoff contact with impacted soils and the discharge of this contact water from the Project Site. Ditching or other forms of channeling around excavation areas will be performed to allow precipitation runoff from un-impacted areas to flow past or around the construction areas.

Soils requiring removal during future construction/modification will be excavated for treatment and/or disposal as necessary. The excavated soils will be stockpiled on plastic, with silt fencing



(or equal) around the piles and plastic covering over the piles, or the excavated soils will be placed directly into roll-off boxes (or similar containers) and covered. These impacted soils will be protected from direct precipitation and contact with rainfall runoff. If rainfall does impact the excavated soils, immediate efforts will be made to limit the impacts and collect any soils washing from the area.

Following completion of any soil removal activities, the areas of disturbance will be repaired and covered with buildings and/or concrete as described in the CAP.

Treatment

Soil may be treated on-site prior to removal from the Project Site to allow for disposal in a municipal Solid Waste Landfill (MSWLF), as opposed to a Subtitle C Hazardous Waste Landfill. Soil treatment will be performed in accordance with a treatability study. Treatment will be performed in designated contained areas. Soil verification testing will be performed to document compliance with the treatment goals.

Health and Safety

Work shall be performed in accordance with OSHA requirements, as provided for in Title 29 of the Code of Federal Regulations, part 120 (29 CFR 120), for hazardous waste work, as appropriate. Workers associated with the excavation and handling of hazardous wastes must meet the training requirements of these regulations. All companies involved in these activities will prepare health and safety plans (HASPs) for their workers and the tasks they are performing, as required by the regulations, and cleaning protocols for their personnel and equipment. Each firm shall perform their work in accordance with this CAP and their HASP. In addition, equipment shall be cleaned prior to its leaving the Project Site. The HASPs and decontamination protocols shall be submitted to the Engineer for approval prior to initiation of the work.

Excavation Monitoring

During any excavation processes, air monitoring will be conducted using a portable gas meter, such as a MultiRae Plus or a Thermo Environmental 580B, OVM. All work will be performed in compliance with a health and safety plan. An environmental specialist, trained in accordance with the OSHA standards for work on hazardous sites², will be on-site to document the excavation process, conduct air monitoring, and collect verification samples, as appropriate. Air monitoring data will be documented during the excavation activities.

Construction

Following site preparation, construction of the proposed building(s) can begin. Workers in contact with the impacted soils must be properly certified and trained, as outlined above. Buildings foundations will be constructed with concrete, steel, and/or timber, depending on engineering protocols. Building floor slabs will be constructed of a minimum of 4 inches of

² OSHA Standard as promulgated in Title 29 of the Code of Federal Regulations, part 1910.120 (29 CFR 1910.120), Hazardous Waste Operations and Emergency Response



concrete. The slabs will not be constructed directly atop impacted soils. Rather, a minimum of two feet of clean, engineered soils will be between impacted soils and the bottom of the proposed building slabs. In the areas of the Project Site that do not meet the Type 1 through Type 4 RRS (see the RRS Beyond Type 5 section below), the ground surfaces will be covered with a minimum of 4 inches of concrete, or other impervious cover, to protect against direct exposure to impacted media and to limit surface water infiltration. This may also be conducted across the entire Project Site, applying the Type 5 standard from property line to property line.

Raised planters may be used at the Project Site. If this is conducted, a minimum of 2 feet of clean soil must be placed below the base of the raised planters, with a filter fabric between the impacted and clean soils. The planters must also be raised above grade by a minimum of 2 feet. This will provide a minimum of 4 feet of clean soils between the top of the planters and the impacted soils. This is likely a sufficient thickness to provide for plant mixing without reintroduction of impacted soils from depth.

Monitoring

(b) Long term monitoring and maintenance is required (as appropriate) for all implemented remedial measures, with a restrictive covenant.

Continued Operation of IWI

A long-term Monitoring Plan has been developed for the Project Site. This Plan is for annual visual inspections at the Project Site, which will document the conditions present and the need for any improvements at the Project Site to protect against exposure to impacted soils. Based on data from the Project Site and down-gradient properties, the impacted soils at the Project Site are not leaching and groundwater impacts have not been detected. Therefore, long-term groundwater monitoring is not required at this time. In the event that additional site data indicates that metals impacts in the underlying fill are leaching to groundwater at levels above background, a groundwater monitoring program will be developed and implemented. A copy of the Long-Term Monitoring Plan is included in Appendix B.

New Construction (Commercial/Industrial and/or Residential)

The aforementioned Long-Term Monitoring Plan will be implemented for new construction also.

Restrictive Covenant

For both scenarios above, a restrictive covenant has been prepared which requires long-term monitoring, maintenance, and posting permanent markers on each side of the Project Site in accordance with this CAP. A copy of the restrictive covenant to be executed and recorded is included in Appendix C.



RRS Beyond Type 5

(c) Type 1, 2, 3, and 4 RRS must be met where applicable beyond the boundary of the Type 5 RRS area.

Continued Operation of IWI

As noted above, impacts at the Project Site are widespread, and extend to significant depths. As such, for the existing development, the Type 5 RRS is being applied to the entire Project Site, from property line to property line. The entire area will have cover placed to restrict exposures to impacted soils. Other surrounding property owners will be responsible for meeting the RRS on their properties, as appropriate. Future owners of the Project Site must maintain the cap, follow the actions set forward in this CAP for site improvements, and comply with the applicable restrictive covenant.

New Construction (Commercial/Industrial and/or Residential)

The Type 5 RRS may be applied to the entire Project Site, from property line to property line. However, for any future developments at the Project Site, since a small portion of the Project Site does not have significant amounts of impacted fill materials (i.e. the northwestern portion), the Type 1 through Type 4 RRS may be applied to those areas per the Rules. If this is conducted, a modified CAP will be submitted to the EPD for approval prior to site activities.

Remedial Measures

(d) Measures must prevent exposures: to carcinogens to 10^{-5} risk, to toxicants to applicable lifetime dose, to air to standards for NESHAP and NAAQ, to GW to Type 1 to 4 RRS as applicable, and to soil beyond the control area to Type 1 to 4 RRS.

Continued Operation of IWI

The compounds at the Project Site include both carcinogenic and non-carcinogenic compounds. Exposure routes include inhalation, ingestion, skin contact, and eye contact. The existing concrete cap prevents exposures that exceed the requirements for systemic toxicants and carcinogens as outlined in Risk Reduction Standard Section above. Air emissions from the contamination are being controlled with the cap at the Project Site.

As indicated in the RRS Section above, groundwater impacts at the Project Site have not been detected and the groundwater at the Project Site is in compliance with Type 1 RRS. The EPD is not requiring additional investigations, or monitoring, relative to groundwater at this time. The Type 5 RRS shall be applied to soil for the entire Project Site, so soil corrective actions relative to Type 1 through Type 4 RRS are not applicable.



New Construction (Commercial/Industrial and/or Residential)

The compounds at the Project Site include both carcinogenic and non-carcinogenic compounds. Exposure routes include inhalation, ingestion, skin contact, and eye contact. The future use of the Project Site will be constructed as to prevent exposures, which exceed the requirements for systemic toxicants and carcinogens as outlined in RRS Section above. Air emissions from the contamination will be controlled with a cap and buildings at the Project Site. These will be accomplished by using a minimum 4 inch concrete cap across the entire Project Site, or to the limits of the Type 5 RRS.

As indicated in the RRS Section above, groundwater impacts at the Project Site have not been detected and the groundwater is in compliance with Type 1 RRS. The EPD is not requiring additional investigations, or monitoring, relative to groundwater at this time. If the Type 5 soil RRS is not applied to the entire Project Site, soils outside the control area will meet the Type 1 through Type 4 RRS, as applicable. This will be accomplished via soil excavation, as appropriate. If this is conducted, a modified CAP will be submitted to the EPD for approval prior to site activities.

CAP COST ESTIMATE

Continued Operation of IWI

The limits of the existing concrete cap at the Project Site are believed to currently extend from property line to property line. However, as indicated above, surveying will be conducted to document these conditions. If concrete does not extend to the limit of the property, or deteriorated areas are observed, additional concrete will be added. The cost for this addition will vary based on the volume of concrete needed. A rough cost estimate for concrete cover would be about \$35 per square yard (for approximately 4 inch slab).

New Construction (Commercial/Industrial and/or Residential)

Future use of the Project Site is unknown at this time. However, for new construction, due to the nature of the impacts at the Project Site, significant costs are anticipated to meet the Type 5 RRS, as set forth in this CAP. This will likely include costs for excavation and disposal of impacted soils, special foundation preparations, and construction of the new cap. Once plans for future development evolve, an estimated cost to meet the Type 5 RRS will be developed, as needed.

AFFIDAVIT/NOTICES

A required by Section 12-8-97(c) of the Act, “an affidavit stating that the Project Site has been listed on the state’s hazardous site inventory and has been designated as needing corrective action due to”, which must be filed with the clerk of superior court in which the Project



Site is located. This affidavit was recorded in Fulton County on May 16, 2006. A copy of the affidavit is included in Appendix F.

SCHEDULE

Continued Operation of IWI

Surveying of the Project Site will be conducted within 60 days of the approval of this CAP. If the Project Site is entirely surrounded by fencing and covered with concrete, as currently believed, a revised CSR will be provided certifying soil meets the Type 5 RRS and groundwater meets the Type 1 RRS (as indicated herein, and supported by any other new Site data) within 60 days of the surveying. The restrictive covenant would be filed concurrently.

If areas of the Project Site are identified that require additional fencing or concrete cover, the fencing/concrete will be placed within 90 days of the surveying. A revised CSR will then be provided certifying the Project Site soil meets the Type 5 RRS and groundwater meets the Type 1 RRS (as indicated herein, and supported by any other new Site data) within 60 days of the concrete placement. The restrictive covenant will also be filed concurrently.

New Construction (Commercial/Industrial and/or Residential)

The Project Site is currently in use as IWI. No plans are currently in place for the sale or redevelopment of the site. Once plans for future development evolve, an estimated timeframe for implementing the standard will be developed.

FINANCIAL ASSURANCE

Currently, for the existing development, corrective actions to meet the Type 5 RRS are not thought to be needed at this time. Cost for operation, monitoring, and maintenance of the site are incidental and financial assurance for these items should not be required. In the event that corrective actions are needed for the current site usage, financial assurance will be provided based on a written cost estimate to complete the work. In the event of new construction at the Project Site, once development plans are known, a cost estimate to meet the steps of this CAP or modified CAP, as required, will be prepared and financial assurance be provided in that amount.



CSR

Following completion of the implementation of the CAP, a revised CSR will be prepared for submittal to the EPD. The revised CSR will document the following, at a minimum:

- A description of each known source of release;
- A legal description of the property;
- A summary of all pertinent field and laboratory data;
- Definition of the horizontal and vertical extent of on-site soil and groundwater impacts;
- A description of geologic and hydrogeologic conditions at the site;
- A description of existing or potential human or environmental receptors;
- A summary of previous actions take to eliminate, control, or minimize the potential risk at the site;
- Documentation of the proper characterization, transportation, and disposal of contaminated soils and/or hazardous wastes, if any;
- A summary of corrective action, if required, to bring the site into compliance with applicable RRS; and
- A concise statement of the findings of the CSR including certification of compliance of Type 5 RRS for soil and Type 1 RRS for groundwater (as indicated herein, and supported by any other new Site data).

UNITED CONSULTING



TABLE 1: SOIL ANALYTICAL TEST RESULTS SUMMARY

Boring/ Sample	Sample Depth	As	Ba	Cd	Cr	Pb	Se	Ag	Hg	TCLP Lead	VOCs
BG	3.5-5	<4.18	77.1	<2.09	15.3	17.6	<4.18	<2.09	<0.0965	--	--
B-1	3.5-5	40	311	95.2	60.9	25,500	<3.94	2.31	0.202	--	--
B-1	19-21	8.37	149	<2.45	14.4	26,500	<4.9	<2.45	0.125	0.271	--
B-1	25-27	<4.96	<4.96	<2.48	<2.48	5.34	<4.96	<2.48	<0.098	--	--
B-2	3.5-5	214	42.3	6.54	35.3	69,000	5.74	2.93	0.340	1,290	--
B-2	17-19	10.7	109	<2.16	6.26	6,720	<4.32	<2.16	<0.0996	--	--
B-2	21-23	<4.61	116	<2.3	76.1	23.3	<4.61	<2.3	<0.099	--	--
B-3	4-6	42.5	--	<2.02	--	296	--	--	--	--	--
B-3	14-16	316	--	<2.39	--	3,310	--	--	--	--	--
B-4	4-6	97.9	--	7.24	--	20,800	--	--	--	--	--
B-4	21-23	<4.37	--	<2.19	--	26.3	--	--	--	--	--
B-5	4-6	<4.89	--	<2.44	--	67.4	--	--	--	--	--
B-6A	9-11	<4.68	--	<2.34	--	101	--	--	--	--	--
B-6A	19-21	152	--	8	--	26,400	--	--	--	--	--
B-7	8	218	--	<2.49	--	21,800	--	--	--	--	--
B-8	3.5-5	137	--	1.98	--	15,400	--	--	--	--	--
B-9*	2 & 25	4.97	--	<1.34	--	68.3	--	--	--	--	--
B-9	13.5-15	16	--	11.9	--	2,310	--	--	--	--	--
B-10	13.5-15	<4.7	--	<2.35	--	26	--	--	--	--	--
B-10A	18.5-20	<4.02	--	<2.01	--	113	--	--	--	--	--
B-10A	23.5-25	<3.53	--	<1.76	--	80.3	--	--	--	--	--
B-10A	43.5-45	<4.48	--	<2.24	--	6.28	--	--	--	--	--
B-11	3.5-5	4.41	--	<1.93	--	602	--	--	--	--	--
B-11	28.5-30	<3.97	--	<1.98	--	42.7	--	--	--	--	--
B-11	38.5-40	<3.21	--	<1.61	--	15.8	--	--	--	--	--
B-12	8.5-10	<3.68	--	<1.84	--	81.8	--	--	--	--	--
B-12	28.5-30	<3.37	--	<1.69	--	196	--	--	--	--	--
B-12	43.5-45	<3.51	--	<1.76	--	14.5	--	--	--	--	--
B-16	1-2	8.51	--	<1.83	--	172	--	--	--	--	--
B-17	3.5-5	58.4	--	14	--	2,970	--	--	--	--	--
B-17	18.5-20	<4.89	--	<2.44	--	11.5	--	--	--	--	--
B-18	1	27.4	--	<2.27	--	792	--	--	--	--	--
B-18	8.5-10	<4.55	--	<2.27	--	19.8	--	--	--	--	--
MW-1	20	--	--	--	--	--	--	--	--	--	<DL
MW-2	15	--	--	--	--	--	--	--	--	--	<DL
SB-11	18-20	--	112	--	--	110	--	--	--	--	--
SB-11	20-22	--	97.1	--	--	41	--	--	--	--	--
SB-12	12-14	--	112	--	--	81	--	--	--	--	--
SB-12	20-22	--	45	--	--	49	--	--	--	--	--
SB-13	2-4	--	27.6	--	--	9,310	--	--	--	--	--
SB-13	18-20	--	152	--	--	360	--	--	--	--	--
SB-13	32-34	--	22.7	--	--	18	--	--	--	--	--
SB-14	16-20	--	445	--	--	11,000	--	--	--	--	--

Boring/ Sample	Sample Depth	As	Ba	Cd	Cr	Pb	Se	Ag	Hg	TCLP Lead	VOCs
HSRP, NC		41	500	39	1200	400	36	10	17	0.015	

Notes:

-- indicates samples not analyzed

BRL is below laboratory reporting limits

<DL: reported as less than detection limit because varying detection limits for various VOC constituents.

* is sample composed of the solid, round, rod materials obtained from approximately 2 and 25 feet bgs.

The materials were pulverized prior to analysis.

Metal concentrations in milligrams per kilogram (mg/kg); except TCLP lead concentrations in milligrams per liter (mg/L)

Metals, respectively, are arsenic, barium, cadmium, chromium, lead, selenium, silver and mercury

TCLP is Toxicity Characteristic Leaching Procedure

HSRP, NC are the notification concentrations under the Hazardous Site Response Program

Bold numbers are concentrations greater than the respective NC

The above listed NC for TCLP lead is the Maximum Contaminant Level (MCL) of 0.015 mg/L

TABLE 2: SUMMARY OF VERTICAL SOIL IMPACTS

BORING	DEPTH OF STAINING	DEPTH OF SLAG	DEPTH OF IMPACTS ¹	DEPTH OF NON-IMPACTED SAMPLES	DEPTH OF BORING	DEPTH OF RESIDUAL SOILS	DEPTH OF AUGER REFUSAL	DEPTH OF GW ²
BG	NE	NE ³	ND ⁴	3.5 to 5	5	3	NE	NE
B-1	2 to 7 18 to 25	2 to 7 13 to 25	3.5 to 5 19 to 21	25 to 27	32	30.5	NE	23
B-2	0 to 8 14.5 to 21	0 to 8	3.5 to 5 17 to 19	21 to 23	28	NE (35) ⁵	28	24
B-3	5 to 10 10.5 to 23 27.5 to 33	5 to 10 10.5 to 23 27.5 to 33	4 to 6 14 to 16	- ⁶	35	NE (35)	NE	24
B-4	0 to 20	0 to 20	4 to 6	21 to 23	23	NE (35)	NE	NE
B-5	NE	NE	ND	4 to 6	15	NE (20)	15	NE
B-6	0 to 4	NE	- ⁵	-	15	NE (35)	15	NE
B-6A	0 to 36	8 to 34	19 to 21	9 to 11	38	36 ⁷	NE	24
B-7	0 to 8	7 to 8	8	-	8	NE (30)	8	NE
B-8	0 to 8	4 to 8	3.5 to 5	-	8	NE (30)	8	NE
B-9	0 to 4 7.5 to 11 18.5 to 25	14.5 to 18.5	13.5 to 15	2/25	25	NE (30)	NE	25
B-10	0 to 15	13.5 to 15	ND	13.5 to 15	15	NE (30)	NE	NE
B-10A	0 to 5 14 to 28.5	13.5 to 15 18.5 to 21	ND	18.5 to 20 23.5 to 25 43.5 to 45	45	33.5 ⁸	NE	25
B-11	0 to 6	NE	3.5 to 5	28.5 to 30 38.5 to 40	40	37.5	NE	25
B-12	9.5 to 19.5 28 to 33	NE	ND	8.5 to 10 28.5 to 30 43.5 to 45	45	33.5 ⁷	NE	25
B-13	Could not penetrate concrete cap in this area							
B-14	0 to 4	NE	NA	NA	4	NE (20)	4	NE
B-15	0 to 2.5	NE	NA	NA	4	NE (20)	4	NE

BORING	DEPTH OF STAINING	DEPTH OF SLAG	DEPTH OF IMPACTS ¹ SAMPLES	DEPTH OF NON-IMPACTED SAMPLES	DEPTH OF BORING	DEPTH OF RESIDUAL SOILS	DEPTH OF AUGER REFUSAL	DEPTH OF GW ²
B-16	0 to 3	NE		<u>1 to 2</u>	3	NE (20)	3	NE
B-17	0 to 12	3.5 to 12	3.5 to 5			17	NE	NE
B-18	0 to 2.5	NE	<i>1</i>	18.5 to 20	20		NE	NE
MW-1	NE	NE	-	-	10	8	NE	22
MW-2	NE	NE	-	-	25	8	NE	21.5
MW-3	5 to 10 10.5 to 23 27.5 to 29	5 to 10 12 to 24 27 to 29	-	-	25	NE (35)	NE	24
SB-11	7 to 10 19 to 20	NR ⁹	ND	<u>18 to 20</u> 20 to 22	30	NR (25)	NE	22 to 24
SB-12	13 to 14	NR	ND	<u>12 to 14</u> 20 to 22	34	NR (25)	NE	24 to 26
SB-13	2 to 4 18 to 25 27 to 28	NR	<i>2 to 4</i>	<u>18 to 20</u> 32 to 34	34	NR (30)	NE	20 to 22
SB-14	8 to 27	NR	<i>16 to 20</i>	-	32	NR (30)	NE	26 to 28

Notes:

1. Impacted refers to detection of lead, arsenic, and/or cadmium greater than their respective NCs.
2. GW: Groundwater depths at time of borings
3. NE: Not encountered
4. ND: None detected
5. NE (##): Depth of residual soils based on review of historic topographic maps.
6. -: None analyzed
7. Apparent residual soils
8. Residual soils encountered between this depth and 43.5 feet. Actual depth could not be determined due to lack of recoveries in shallower samples.
9. NR: Not reported

All depths recorded in feet

Bold numbers are impacted soil samples that are stained and have concentrations of slag

Italicized numbers are impacted soil samples that are stained only, no slag present

Underlined numbers are non-impacted soil samples that were stained and/or contained concentrations of slag.

APPENDIX A – RRS CALCULATIONS

Table 2. Type 1 Soil Criteria

Regulated Substance/Analyte	Concentration (mg/kg)
Antimony	4
Arsenic	20
Barium	1000
Beryllium	2
Cadmium	2
Chromium	100
Cobalt	20
Copper	100
Lead	75
Mercury	0.5
Nickel	50
Selenium	2
Silver	2
Thallium	2
Vanadium	100
Zinc	100

APPENDIX IV
GEORGIA ADULT LEAD MODEL

The "Georgia Adult Lead Model" established by this appendix applies to the protection of workers or other adults at nonresidential sites at which it can be demonstrated that children are not now exposed, nor will become exposed, to lead in soil or soil-derived dust at the site. This lead model attempts to protect against elevated blood lead levels in the unborn fetus of women who spend considerable time at the site. Protection of the blood lead of a hypothetical fetus ensures that any other human receptor at the site will be adequately protected.

The Georgia model ultimately involves only two equations. Equation 1 establishes the average adult blood level that is protective of the fetus, which is an input to Equation 2. Equation 2 calculates the soil cleanup level, the concentration that would generate the average adult blood level indicated in Equation 1.

$$PbB = \frac{PbB_{fetal}}{R \cdot GSD^{1.645}} = \frac{10}{(0.9)(2.04)^{1.645}} \quad (\text{Equation 1})$$

$$= 3.439$$

$$C_s = \left[\frac{PbB - PbB_b}{BSF \cdot (EF / AT)} - (C_w \cdot I_w \cdot A_w) \right] [I_s \cdot A_s]^{-1} \quad (\text{Equation 2})$$

$$= \left[\frac{3.439 - 1.38}{0.4 (219/365)} - (15)(1)(0.2) \right] \frac{1}{(0.05)(0.12)} = 930 \text{ mg/kg}$$

All terms found in the above equations are described in Table 1 on the following page.

TABLE 1. Parameters, Definitions, and Default Values to be used in Equations 1 and 2

Parameters	Definitions (Units)	Defaults
PbB _b	Typical blood lead concentration in adults, specifically women of child-bearing age, in the absence of exposures to the site that is being assessed ($\mu\text{g/dL}$) [baseline]	1.38
PbB _{fetal}	The blood lead goal for the unborn fetus, defined as the concentration which will have a 95% probability of not being exceeded ($\mu\text{g/dL}$)	10.0
GSD	Geometric standard deviation of blood lead concentration among the exposed adult population, specifically women of child-bearing age (unitless)	2.04
1.645	Value of the exponent used to estimate the 95th percentile from a lognormal distribution	1.645
R	Constant of proportionality between fetal blood lead concentration at birth and maternal blood lead concentration (unitless)	0.9
BSF	Biokinetic slope factor relating (quasi-steady state) increase in typical adult blood lead concentration to average daily lead uptake ($\mu\text{g/dL}$ per $\mu\text{g/day}$)	0.4
EF	Exposure frequency for contact with assessed soils and/or dust derived in part from these soils (number of days of exposure during the year) (days/yr)	219
AT	Averaging time for continuing longterm exposures (days/yr)	365
C _s	Soil target concentration; i.e., concentration of lead in soil that is goal for the site (mg/kg)	to be determined by Eq.2
I _s	Intake rate of soil, predominantly occupational exposures to indoor soil-derived dust rather than outdoor soil (g/day)	0.05
A _s	Absolute gastrointestinal absorption fraction for ingested lead in soil and in dust derived from soil (unitless)	0.12
C _w	Concentration of lead in ground water at site ($\mu\text{g/L}$); provided, however, when taken together with concentrations of lead in soil shall not exceed a PbB of 10 $\mu\text{g/dL}$	see HSRA 391-3-19.07(9)(c)
I _w	Intake rate of water from on-site ground water (L/day)	1
A _w	Absolute gastrointestinal absorption fraction for lead ingested in drinking water (unitless)	0.20

see
15 w/L

```

=====
Model Version: 1.0 Build 261
User Name: United Consulting
Date: 6/13/2006
Site Name: Ironworks International
Operable Unit: Site
Run Mode: Site Risk Assessment
=====

```

Water Data

Drinking water concentration conservative to sample detection limit.

Soil/Dust Data

Soil/Dust Data

Soil/Dust Data

Test value for blood level

```

=====
The time step used in this model run: 1 - Every 4 Hours (6 times a day).

```

***** Air *****

Indoor Air Pb Concentration: 30.000 percent of outdoor.
Other Air Parameters:

Age	Time Outdoors (hours)	Ventilation Rate (m ³ /day)	Lung Absorption (%)	Outdoor Air Pb Conc (ug Pb/m ³)
.5-1	1.000	2.000	32.000	0.100
1-2	2.000	3.000	32.000	0.100
2-3	3.000	5.000	32.000	0.100
3-4	4.000	5.000	32.000	0.100
4-5	4.000	5.000	32.000	0.100
5-6	4.000	7.000	32.000	0.100
6-7	4.000	7.000	32.000	0.100

***** Diet *****

Age	Diet Intake(ug/day)
.5-1	5.530
1-2	5.780
2-3	6.490
3-4	6.240
4-5	6.010
5-6	6.340
6-7	7.000

***** Drinking Water *****

Water Consumption:

Age	Water (L/day)
.5-1	0.200
1-2	0.500
2-3	0.520
3-4	0.530
4-5	0.550
5-6	0.580
6-7	0.590

Drinking Water Concentration: 10.000 ug Pb/L

***** Soil & Dust *****

Multiple Source Analysis Used

Average multiple source concentration: 213.000 ug/g
 Mass fraction of outdoor soil to indoor conversion factor: 0.700
 Outdoor airborne lead to indoor household dust lead concentration: 100.000
 Use alternate indoor dust Pb sources? No

Age	Soil (ug Pb/g)	House Dust (ug Pb/g)
.5-1	290.000	213.000
1-2	290.000	213.000
2-3	290.000	213.000
3-4	290.000	213.000
4-5	290.000	213.000
5-6	290.000	213.000
6-7	290.000	213.000

***** Alternate Intake *****

Age	Alternate (ug Pb/day)
.5-1	0.000
1-2	0.000
2-3	0.000
3-4	0.000
4-5	0.000
5-6	0.000
6-7	0.000

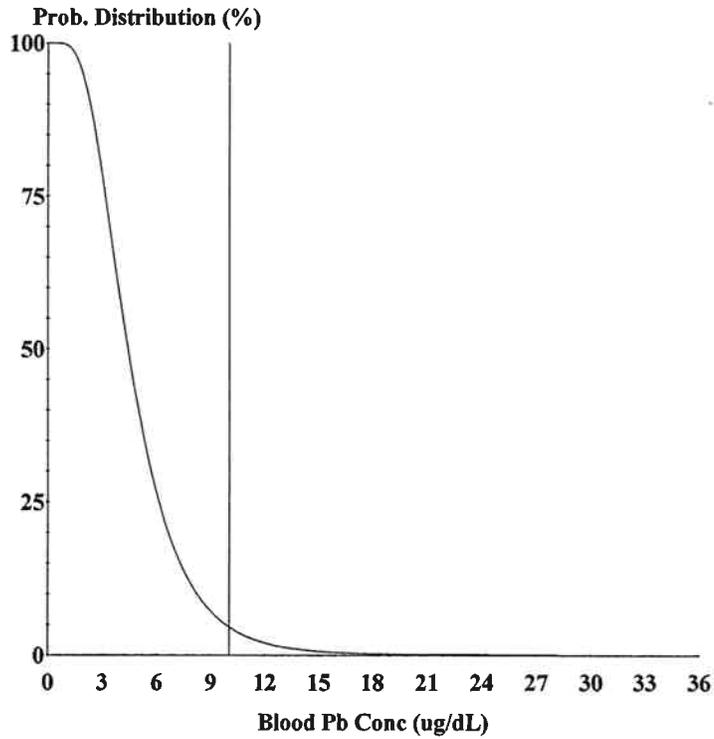
***** Maternal Contribution: Infant Model *****

Maternal Blood Concentration: 2.500 ug Pb/dL

 CALCULATED BLOOD LEAD AND LEAD UPTAKES:

Year	Air (ug/day)	Diet (ug/day)	Alternate (ug/day)	Water (ug/day)
.5-1	0.021	2.491	0.000	0.901
1-2	0.034	2.560	0.000	2.215
2-3	0.062	2.915	0.000	2.336
3-4	0.067	2.845	0.000	2.416
4-5	0.067	2.808	0.000	2.570
5-6	0.093	2.989	0.000	2.735
6-7	0.093	3.316	0.000	2.795

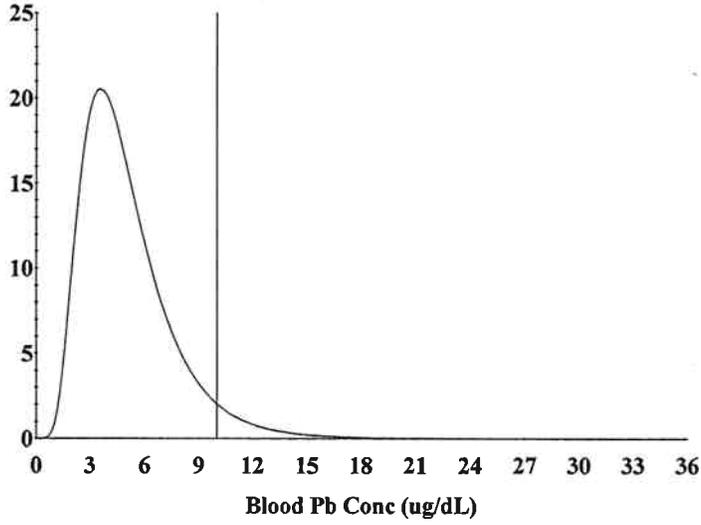
Year	Soil+Dust (ug/day)	Total (ug/day)	Blood (ug/dL)
.5-1	5.689	9.103	4.9
1-2	8.885	13.695	5.6
2-3	9.010	14.322	5.3
3-4	9.145	14.473	5.1
4-5	6.942	12.387	4.3
5-6	6.306	12.123	3.8
6-7	5.983	12.187	3.5



Cutoff = 10.000 ug/dl
Geo Mean = 4.608
GSD = 1.600
% Above = 4.964

Age Range = 0 to 84 months
Time Step = Every 4 Hours
Run Mode = Site Risk Assessment

Prob. Density (Blood Pb)



Cutoff = 10.000 ug/dl
Geo Mean = 4.608
GSD = 1.600
% Above = 4.964
% Below = 95.036

Age Range = 0 to 84 months
Time Step = Every 4 Hours
Run Mode = Site Risk Assessment

APPENDIX B – LONG-TERM MONITORING PLAN

This Long-Term Monitoring Plan (Plan) has been developed as required by section 391-3-19-.07(10)(b) of the HSRA Rules.

Contacts

The responsible contacts for Iron Works International Inc. (IWI or Project Site) are Mr. Clinton Cole, esq. and Ted Sandler, esq. Mr. Cole and Mr. Sandler are with Hartman, Simons, Spielman, & Wood, LLP and are the legal counsel for IWI and their number is 770-955-3955. In their absence, contact Mr. Angelo Viale, the owner of IWI and his number is 404-351-7038. For United Consulting, as authorized representatives of IWI, the contacts are: Mr. Russell Griebel at 770-582-2788 and/or Mr. John Clerici at 770-582-2819.

Property Location

The Project Site is located approximately 350 feet south of the intersection of 14th Street and Howell Mill Road in Atlanta, Fulton County, Georgia. The Project Site is referenced by the address of 1085 Howell Mill Road. More specifically, the Project Site is located in Land Lot 150 of the 17th District, Square 9, Parcel 19, Fulton County, Georgia.

Property Use

The Project Site is currently developed with the IWI facility. This includes the fabrication facility, storage areas, show room, and offices. As such, one proposed use is the continued commercial operations currently being conducted at the site. However, other commercial, industrial, and/or residential uses at the site may be implemented in the future. Development of the Project Site will be restricted as outlined within the restrictive covenant and in accordance with the Corrective Action Plan (CAP).

If sold, new owners will be informed of this requirement and this Plan, and that maintenance of this Plan is a requirement for obtaining the CAP. The overall purpose of this Plan is to provide continued site review (monitoring) relative to property use in accordance with the Type 5 RRS and this restriction.

Remedial Actions

Lead and other metals have been detected in the soils at the Project Site. The primary approach for remediation is a concrete cap and assorted buildings, which will limit exposure to the impacted soils and infiltration of rainwater into the impacted soils. No soil removal activities are planned.

If future uses of the Project Site require soil removal actions as part of the development, those removals will be limited to the areas required for construction purposes. A site wide removal action is not foreseen. Soils requiring removal for future construction will be excavated for treatment and/or disposal off-site. Details on these actions are outlined in the CAP.

Runoff Control

The Project Site will be entirely covered with a concrete cap and buildings, which limit rainfall infiltration and encourage surface water runoff. Surface water runoff mainly consists of sheet flow across the top of the concrete and roofs. Some surface water is collected in storm water drains located along Howell Mill Road. Other runoff is directly off-site, in down slope directions. The concrete at the Project Site limits the ability for surface migration of impacted soils.

Any future construction activities on the Project Site will include methods for segregating rainfall runoff. The goal is to minimize runoff contact with impacted soils and the discharge of this contact water from the Project Site. Ditching or other forms of channeling around excavation areas will be performed to allow precipitation runoff from un-impacted areas to flow past or around the construction areas.

Soils requiring removal during future construction/modification will be excavated for treatment and/or disposal as necessary. The excavated soils will be stockpiled on plastic, with silt fencing (or equal) around the piles and plastic covering over the piles, or the excavated soils will be placed directly into roll-off boxes (or similar containers) and covered. These impacted soils will be protected from direct precipitation and contact with rainfall runoff. If rainfall does impact the excavated soils, immediate efforts will be made to limit the impacts and collect any soils washing from the area.

Following completion of any soil removal activities, the areas of disturbance will be repaired and covered with buildings and/or concrete as described in the CAP.

Groundwater Monitoring

Based on data from the Project Site and down-gradient properties, the impacted soils at the Project Site are not leaching and groundwater impacts have not been detected. Therefore, long-term groundwater monitoring is not required at this time. In the event that additional site data indicates that metals impacts in the underlying fill are leaching to groundwater at levels above background, a groundwater monitoring program will be developed and implemented.

Site Inspections

A professional engineer or professional geologist, licensed in the State of Georgia, will inspect the Project Site on an annual basis. The inspection will assess Project Site conditions and uses to verify they are consistent with the CAP and Type 5 RRS. The conditions of the ground cover will be assessed. The inspections will be documented on an evaluation form, which will be provided with the report to the EPD. The Monitoring Evaluation Form is attached.

Schedule of Implementation and Reporting

This Plan will be implemented upon the approval of the CAP, with the first annual report being submitted one year after completing the implementation of the CAP and acceptance of the final CSR.

The monitoring/evaluation will be performed and reported annually, as described above. A report will be submitted to the EPD each year, with the month dependant on the date of implementation of the CAP. The report will include a letter summarizing the past efforts (release and remediation) and changes to the site permitted in the CAP and restrictive covenant. The inspection form will be attached, along with any requisite explanations.

Plan Maintenance

This Plan will be reviewed annually. Any changes in ownership or responsible parties/contact names will require the Plan to be up-dated/revised. The revised Plan will be submitted to the EPD with the annual report (discussed above).

APPENDIX C – RESTRICTIVE COVENANT

After Recording Return To:

Clinton Taw Cole, Esq.
Hartman, Simons, Spielman & Wood, LLP
6400 Powers Ferry Road, N.W.
Suite 400
Atlanta, Georgia 30339

NOTE TO CLERK:
Please cross-reference to
Deed Book 23097, Page 337 and
Deed Book 42589, Page 464
Fulton County, Georgia Records

DECLARATION OF RESTRICTIVE COVENANT

THIS DECLARATION OF RESTRICTIVE COVENANT (“Declaration”) is hereby made and entered into as of this _____ day of _____, 2007 by Iron Works International, Inc. (“Declarant”).

WITNESSETH:

WHEREAS, Declarant is the owner of certain real property identified by address as 1085 Howell Mill Road in Atlanta, Georgia (the “Site”) and more particularly described on Exhibit “A” attached hereto and incorporated herein; and

WHEREAS, environmental contamination was identified on property adjacent to the Site, and as a result the Georgia Department of Natural Resources, Environmental Protection Division (“EPD”) placed the adjacent “Welcome Years Site” on the Hazardous Site Inventory (HSI No. 10637); and

WHEREAS, environmental investigation at the Site identified soil contamination above the notification concentrations, and EPD added the Site to the area covered by the Welcome Years Site HSI listing; and

WHEREAS, EPD required the completion of a Compliance Status Report (“CSR”) of the Site by Declarant, and a CSR and modifications thereto were submitted to EPD; and

WHEREAS, regulated substances above background concentrations have not been found in groundwater at the site based on the CSR; and

WHEREAS, Declarant submitted and the Director of EPD approved a Corrective Action Plan and any subsequent amendments (“CAP”) which is on file with EPD and incorporated herein to bring the Site into compliance with the risk reduction standards (“RRS”); and

WHEREAS, Declarant intends to use the Site for residential and/or non-residential uses subject to the engineering and institutional controls set forth in the CAP; and

WHEREAS, Declarant desires to limit access and exposure to contaminated soils at the Site through engineering and institutional controls in the manner described in the CAP in order to certify compliance with the Type 5 RRS.

NOW, THEREFORE, Declarant hereby agrees and declares as follows:

1. The foregoing recitals shall constitute a part of this declaration.
2. The Site shall only be used for activities that will not substantially interfere with the remedial actions described in the CAP.
3. The Site may only be used for the purposes described in the CAP, and only if the requisite engineering and institutional controls are implemented consistent with the CAP.
4. All development, preparation and/or excavation activities required for continued operation, reuse and/or redevelopment of the Site shall be undertaken in accordance with the engineering controls set forth in the CAP to prevent exposure to contaminated soils.
5. All required maintenance and monitoring shall be implemented as set forth in the CAP.
6. The following activities shall be prohibited at the Site:
 - a. All activities that may substantially interfere with the remedial action, operation and maintenance, long-term monitoring, engineering and institutional controls, or other measures necessary to ensure the integrity of the remedial action; and
 - b. All activities that may result in human exposures above those allowed by Georgia's Rules for Hazardous Site Response, Chapter 391-3-19, depending on the use of the Site at that time, i.e., if the Site is being used for residential purposes, then the residential human exposure limits shall apply, or if the Site is being used for non-residential purposes, the non-residential human exposure limits shall apply; and
 - c. All activities that would result in the release of a regulated substance, which has been remediated in accordance with Section 391-3-19-.07(10) of Georgia's Rules for Hazardous Site Response.

7. The Director shall have the authority to enforce the restrictions set forth in the Declaration by legal action.
8. This shall be a covenant running with the land, and shall be binding upon all successors and assigns of title or interest in or to the Site.
9. Declarant shall install and maintain a permanent marker on each side of the Site, which delineates the restricted area.

IN WITNESS WHEREOF, Declarant has caused this instrument to be executed by a partly duly authorized representative thereunto as of the day and year first above written.

DECLARANT:

Signed, sealed and delivered in the presence of:

Iron Works International, Inc., a Georgia corporation

Witness

By: _____

Notary Public

Name: _____

Title: _____

My Commission Expires: _____

(NOTARY SEAL)

(Seal)

Exhibit "A"

Legal Description

ALL THAT TRACT OR PARCEL OF LAND lying and being in Land Lot 150 of the 17th District of Fulton County, Georgia, and being more particularly described as follows:

BEGINNING AT A ½ INCH REBAR FOUND on the easterly right-of-way of Howell Mill Road (50 foot right-of-way), which ½ inch rebar found is located 350.89 southerly, as measured along the easterly right-of-way of Howell Mill Road, from the intersection formed by the easterly right-of-way of Howell Mill Road and the southeasterly right-of-way of Fourteenth Street (60 foot right-of-way) as Fourteenth Street is now presently located; running thence north 89° 39' 00" east a distance of 400.00 feet to an open top found; thence south 06° 25' 49" west a distance of 170.70 feet to an iron pin set; thence south 83° 10' 00" west a distance of 400.00 feet to a nail set on the easterly right-of-way of Howell Mill Road; continuing thence in a northerly direction along the easterly right-of-way of Howell Mill Road and following the curvature thereof an arc distance of 174.60 feet (which arc has a chord bearing of north 06° 17' 39" east and a chord distance of 173.95 feet) to a ½ inch rebar found on the easterly right-of-way of Howell Mill Road and the POINT OF BEGINNING.

Said tract is described herein according to Plat of Survey for Ironworks International, Inc., The Money Store Investment Corporation, the U.S. Small Business Administration and Old Republic Title Insurance Company by McClung Surveying, Inc., dated August 18, 1997 and is delineated thereon as containing 1.574 acres.

The property herein conveyed is the same property as that conveyed by Willie Mae Poss to Charles T. Poss by Warranty Deed recorded in Deed Book 6195, page 472, Fulton County, Georgia Records and identified therein as first parcel, second parcel and third parcel and is a portion of the property conveyed to Grantors herein by Executor's Deed of Assent recorded at Deed Book 8793, page 356, Fulton County, Georgia records and by Corrective Deed of Assent recorded concurrently herewith.

**APPENDIX D – INTERIM GROUNDWATER RESULTS, VLP
2, LLC, NOVEMBER 6, 2006 LETTER**



November 6, 2006

Mr. Josh Lawson
Hazardous Site Response Program
Environmental Protection Division
Suite 1462
205 Butler Street, S.E.
Atlanta, Georgia 30334

RECEIVED

NOV 13 2006

HAZ. SITES RESPONSE PROG.

Subject: Interim Groundwater Results
Welcome Years Site / VLP 2, LLC f/k/a Welcome Years, Inc.
1115 Howell Mill Rd. and 675 Ethyl St., Atlanta, Fulton County, Georgia
HSI #10637
QORE Job No. 26145-A

Dear Mr. Lawson:

As requested by you and authorized by VLP 2, LLC, QORE, Inc. is providing analytical groundwater results collected from the referenced site.

The analytical data for total metals in groundwater collected from site wells is included on attached Table 1. In addition, the laboratory analytical reports are included. The groundwater was collected from wells located in or down-gradient of metals-contaminated soil. All the samples were unfiltered and collected by low-flow sampling techniques, utilizing a peristaltic pump. The well locations are shown on Plate 1, which also illustrates the groundwater flow direction. As evaluation of Plate 1 indicates, the groundwater flow direction on the Ethyl Street parcel appears to be to the northeast.

If you have any questions regarding this correspondence or require additional information, please contact us.

Respectfully submitted,

QORE, Inc.

A handwritten signature in black ink, appearing to read "Curt Gorman", written in a cursive style.

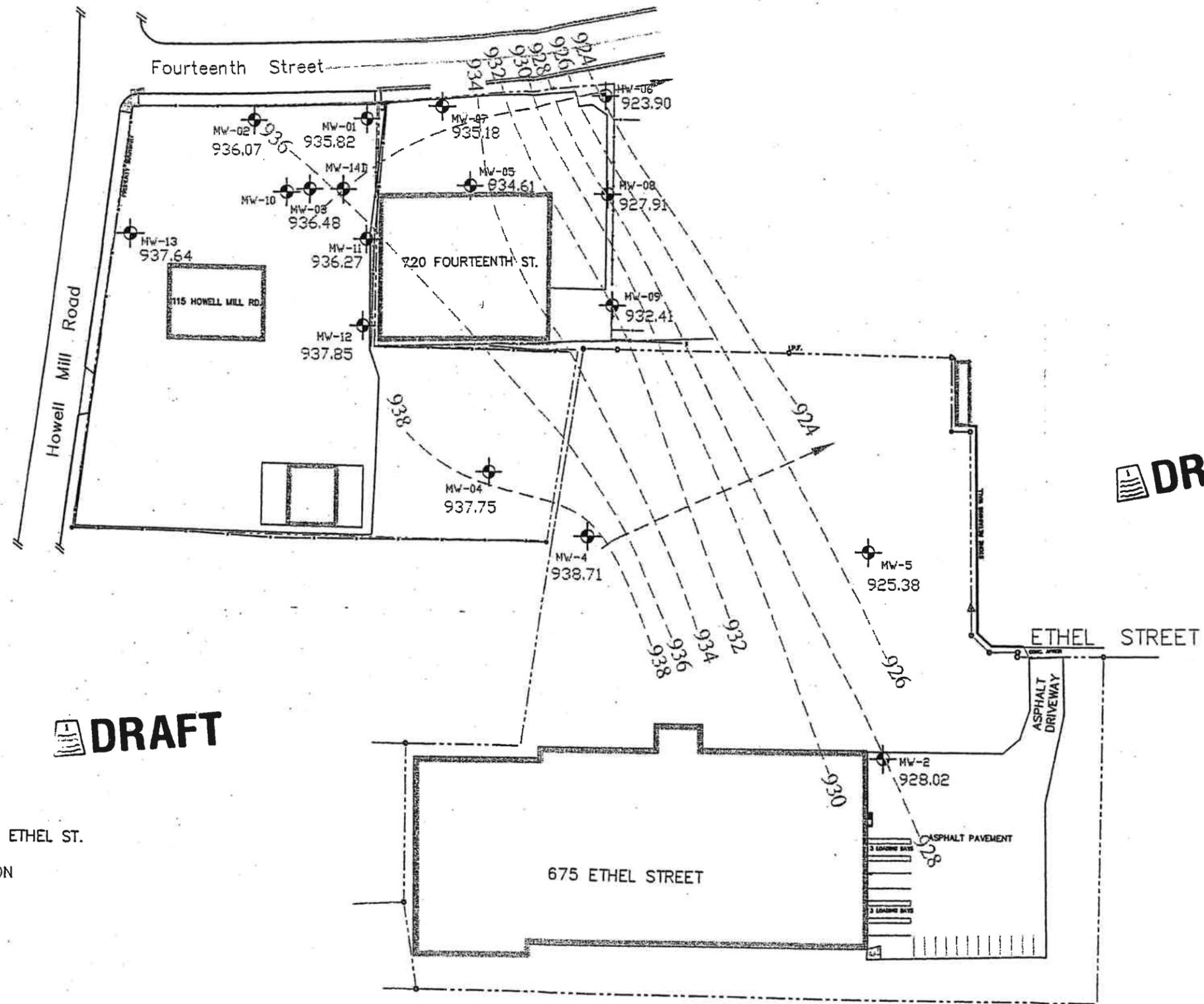
Curt Gorman, P.G.
Senior Hydrogeologist
Reg. Ga. 671

CG/jk

Attachments

cc: Mr. Ed Rondeau/VLP 2, LLC

ATTACHMENTS

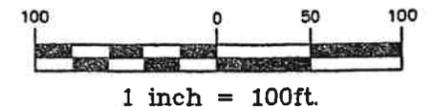


DRAFT

DRAFT

EXPLANATION

- MW-01 MONITORING WELL LOCATION
- MW-4 MONITORING WELL LOCATION AT 675 ETHEL ST.
- MW-14D BEDROCK MONITORING WELL LOCATION
- 937.75 GROUNDWATER ELEVATION IN FEET
8/24/06 (MEAN SEA LEVEL DATUM)
- 936 CONTOUR LINE ESTIMATED
EQUAL GROUNDWATER ELEVATION
- ESTIMATED GROUNDWATER FLOW LINE
- PROPERTY BOUNDARY



SOURCES: A.S. GIOMETTI & ASSOC., INC., LAND LOT 150, JOB No. 98-162,
OCT. 28, 1998; JOB No. 2004-136, JUNE 16, 2004;
KECK & WOOD, INC., JOB No. Q22039, DWG No. 3-02-029,
APRIL 12, 2002.



PROJECT NO: 26145-A	REPORT NO: --	DATE: 09/29/06
VERTICAL SCALE: N/A	HORIZONTAL SCALE: 1"=100'	CAD FILE NO: GW_3_1A.DWG
DRAWN BY: MRH	REVIEWED BY: C.GORMAN	PLATE NO: 1

GROUNDWATER TABLE ELEVATION
CONTOUR MAP
1115 HOWELL MILL ROAD,
720 14th ST., & 675 ETHEL ST.
ATLANTA, GEORGIA

TABLE 1. SUMMARY OF SELECTED GROUNDWATER METALS DATA

**WELCOME YEARS SITE / VLP 2, LLC
675 Ethyl Street and 1115 Howell Mill Road Parcels
Atlanta, Georgia, HSI #10637
Job No. 26145-A**

Sample Location	Date	Constituent Concentration (in mg/l)				
		Arsenic	Barium	Cadmium	Chromium	Lead
MW - 2	03/23/06	<0.050	<0.020	<0.005	<0.010	<0.010
MW - 2 (Dup)	03/23/06	<0.050	<0.020	<0.005	<0.010	<0.010
MW - 4	06/23/06	<0.050	0.321	<0.005	<0.010	<0.010
MW - 4 (Dup)	06/23/06	<0.050	0.313	<0.005	<0.010	<0.010
MW - 5	03/23/06	<0.050	0.0557	<0.005	<0.010	<0.010
MW - 04 ¹	03/22/06	<0.050	0.0865	<0.005	<0.010	0.011

November 6, 2006

Note:

¹Well located at 1115 Howell Mill Road parcel; all other wells located at 675 Ethyl Street.

Abbreviations and Symbols:

< - Less than
Dup - Duplicate sample

 **DRAFT**

RECEIVED

NOV 13 2006

HAZ. SITES RESPONSE PROG.



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

March 29, 2006

Curt Gorman
Qore Property Sciences
11420 Johns Creek Pkwy
Duluth, GA 30097

TEL: (770) 476-3555
FAX (770) 476-8930

RE: Ethel St.

Dear Curt Gorman:

Order No.: 0603D33

Analytical Environmental Services, Inc. received 3 samples on 3/23/2006 2:35:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative. Sample results are not dry weight corrected, unless if Pmoist analysis are requested on the chain of custody or other project specific arrangements have been made. AES' certifications are as follows:

- NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water, effective 06/01/05-06/30/06.
- AIHA Certification number 505 for analysis of Industrial Hygiene samples (Organics, Inorganics), Paint Chips, Soil and Dust Wipes, effective until 02/01/07.

These results relate only to the items tested. This report may only be reproduced in full and contains 8 total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.

Sincerely,

James Forrest
Project Manager

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client ORE PROP.

Work Order Number 0603D33

Checklist completed by MWH 3/23/6
Signature Date

Carrier name: FedEx UPS Courier Client US Mail Other

Shipping container/cooler in good condition? Yes No Not Present

Custody seals intact on shipping container/cooler? Yes No Not Present

Custody seals intact on sample bottles? Yes No Not Present

Container/Temp Blank temperature in compliance? (4°C±2)* Yes No

Cooler #1 3.7°C Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes No

Chain of custody signed when relinquished and received? Yes No

Chain of custody agrees with sample labels? Yes No

Samples in proper container/bottle? Yes No

Sample containers intact? Yes No

Sufficient sample volume for indicated test? Yes No

All samples received within holding time? Yes No

Was TAT marked on the COC? Yes No

Proceed with Standard TAT as per project history? Yes No Not Applicable

Water - VOA vials have zero headspace? No VOA vials submitted Yes No

Water - pH acceptable upon receipt? Yes No Not Applicable

Adjusted? _____ Checked by MA

Sample Condition: Good Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes No

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

Analytical Environmental Services, Inc.

Date: 29-Mar-06

CLIENT: Qore Property Sciences
Lab Order: 0603D33
Project: Ethel St.
Lab ID: 0603D33-001A

Client Sample ID: MW-2
Tag Number:
Collection Date: 3/23/2006 1:20:00 PM
Matrix: GROUNDWATER

Analyses	Result	Limit Qual	Units	BatchID	DF	Date Analyzed
METALS, TOTAL		SW6010B		(SW3010A)		Analyst: BB
Arsenic	BRL	0.0500	mg/L	68971	1	3/28/2006 9:11:53 AM
Barium	BRL	0.0200	mg/L	68971	1	3/28/2006 9:11:53 AM
Cadmium	BRL	0.00500	mg/L	68971	1	3/28/2006 9:11:53 AM
Chromium	BRL	0.0100	mg/L	68971	1	3/28/2006 9:11:53 AM
Lead	BRL	0.0100	mg/L	68971	1	3/28/2006 9:11:53 AM

Qualifiers:	*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	N	Analyte not NELAC certified	P	NELAC analyte certification pending
	Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: 29-Mar-06

CLIENT: Qore Property Sciences
Lab Order: 0603D33
Project: Ethel St.
Lab ID: 0603D33-002A

Client Sample ID: MW-2 DUPLICATE
Tag Number:
Collection Date: 3/23/2006 1:25:00 PM
Matrix: GROUNDWATER

Analyses	Result	Limit	Qual	Units	BatchID	DF	Date Analyzed
METALS, TOTAL							
		SW6010B					Analyst: BB
Arsenic	BRL	0.0500		mg/L	68971	1	3/28/2006 9:15:35 AM
Barium	BRL	0.0200		mg/L	68971	1	3/28/2006 9:15:35 AM
Cadmium	BRL	0.00500		mg/L	68971	1	3/28/2006 9:15:35 AM
Chromium	BRL	0.0100		mg/L	68971	1	3/28/2006 9:15:35 AM
Lead	BRL	0.0100		mg/L	68971	1	3/28/2006 9:15:35 AM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- BRL Below Reporting Limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- Rpt Limit Reporting Limit

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P NELAC analyte certification pending
- S Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: 29-Mar-06

CLIENT: Qore Property Sciences
 Lab Order: 0603D33
 Project: Ethel St.
 Lab ID: 0603D33-003A

Client Sample ID: MW-5
 Tag Number:
 Collection Date: 3/23/2006 12:20:00 PM
 Matrix: GROUNDWATER

Analyses	Result	Limit	Qual	Units	BatchID	DF	Date Analyzed
METALS, TOTAL							
		SW6010B			(SW3010A)		Analyst: BB
Arsenic	BRL	0.0500		mg/L	68971	1	3/28/2006 9:19:19 AM
Barium	0.0557	0.0200		mg/L	68971	1	3/28/2006 9:19:19 AM
Cadmium	BRL	0.00500		mg/L	68971	1	3/28/2006 9:19:19 AM
Chromium	BRL	0.0100		mg/L	68971	1	3/28/2006 9:19:19 AM
Lead	BRL	0.0100		mg/L	68971	1	3/28/2006 9:19:19 AM

Qualifiers:

*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
BRL	Below Reporting Limit	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
N	Analyte not NELAC certified	P	NELAC analyte certification pending
Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: 29-Mar-06

CLIENT: Core Property Sciences
 Work Order: 0603D33
 Project: Ethel St.

ANALYTICAL QC SUMMARY REPORT

TestCode: 6010B_TAL_W_I

Sample ID	MB-68971	SampType: MBLK	TestCode: 6010B_TAL_	Units: mg/L	Prep Date: 3/27/2006	RunNo: 81179					
Client ID:	68971	Batch ID: 68971	TestNo: SW6010B		Analysis Date: 3/28/2006	SeqNo: 1607148					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	BRL	0.0500									
Barium	BRL	0.0200									
Cadmium	BRL	0.00500									
Chromium	BRL	0.0100									
Lead	BRL	0.0100									

Sample ID	LCS-68971	SampType: LCS	TestCode: 6010B_TAL_	Units: mg/L	Prep Date: 3/27/2006	RunNo: 81179					
Client ID:	68971	Batch ID: 68971	TestNo: SW6010B		Analysis Date: 3/28/2006	SeqNo: 1607147					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	1.028	0.0500	1	0	103	85	115	0	0		
Barium	1.033	0.0200	1	0	103	85	115	0	0		
Cadmium	1.034	0.00500	1	0	103	85	115	0	0		
Chromium	1.052	0.0100	1	0	105	85	115	0	0		
Lead	1.034	0.0100	1	0	103	85	115	0	0		

Sample ID	0603D32-004AMS	SampType: MS	TestCode: 6010B_TAL_	Units: mg/L	Prep Date: 3/27/2006	RunNo: 81179					
Client ID:	68971	Batch ID: 68971	TestNo: SW6010B		Analysis Date: 3/28/2006	SeqNo: 1607151					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	1.001	0.0500	1	0	100	75	125	0	0		
Barium	1.036	0.0200	1	0.0865	95	75	125	0	0		
Cadmium	0.9784	0.00500	1	0	97.8	75	125	0	0		
Chromium	1.03	0.0100	1	0.001502	103	75	125	0	0		
Lead	0.9476	0.0100	1	0.01105	93.7	75	125	0	0		

Qualifiers:	B	Analyte detected in the associated Method Blank	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	N	Analyte not NELAC certified
	R	RPD outside accepted recovery limits	S	Spike Recovery outside accepted recovery limits		

CLIENT: Qore Property Sciences
 Work Order: 0603D33
 Project: Ethel St.

ANALYTICAL QC SUMMARY REPORT

TestCode: 6010B_TAL_W_T

Sample ID	0603D32-004AMSD	SampType: MSD	TestCode: 6010B_TAL_	Units: mg/L	Prep Date: 3/27/2006	RunNo: 81179					
Client ID:	68971	Batch ID: 68971	TestNo: SW6010B		Analysis Date: 3/28/2006	SeqNo: 1607152					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	1.006	0.0500	1	0	101	75	125	1.001	0.502	20	
Barium	1.036	0.0200	1	0.0865	95	75	125	1.036	0.00772	20	
Cadmium	0.9721	0.00500	1	0	97.2	75	125	0.9784	0.647	20	
Chromium	1.023	0.0100	1	0.001502	102	75	125	1.03	0.666	20	
Lead	0.9403	0.0100	1	0.01105	92.9	75	125	0.9476	0.775	20	

Qualifiers:	B	Analyte detected in the associated Method Blank	BRL	Below Reporting Limit	E	Value above quantitation range
H		Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	N	Analyte not NELAC certified
R		RPD outside accepted recovery limits	S	Spike Recovery outside accepted recovery limits		



ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL.: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

CHAIN OF CUSTODY

Work Order: 0603D33

Date: 3/23/06 Page 1 of 1

CREATED BY: Curt Gorman
 PHONE: 7-476-3555
 SAMPLED BY: Curt Gorman
 ADDRESS: 11420 Johns Creek Pkwy
Atlanta GA 30340
 FAX: 7-476-8930
 SIGNATURE: [Signature]

#	SAMPLE ID	SAMPLED		Grab	Composite	Matrix (See codes)	ANALYSIS REQUESTED	PRESERVATION (See codes)	REMARKS	No # of Containers
		DATE	TIME							
1	MW-2	3/23/06	1320	X		GW				
2	MW-2 Dup bicu	3/23/06	1325	X		GW				
3										
4	MN-5	3/23/06	1220	X		GW				
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										

RELINQUISHED BY: [Signature] DATE/TIME: 3/23/06
 RECEIVED BY: [Signature] DATE/TIME: 3/23/06
 PROJECT NAME: 26745B
 PROJECT #: 26745B
 SITE ADDRESS: 673 Ethel St, Apt. 147
 SEND REPORT TO: CURT GORMAN
 INVOICE TO: [Signature]
 (IF DIFFERENT FROM ABOVE)
 SHIPMENT METHOD: UPS MAIL COURIER
 OUT: / / VIA:
 IN: UPS MAIL COURIER VIA:
 CLIENT: GEORGE UPS MAIL COURIER
 GEORGE OTHER
 SPECIAL INSTRUCTIONS/COMMENTS:
 SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; NO LATE IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
 SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.
 MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) O = Other (specify)
 PRESERVATIVE CODES: H+1 = Hydrochloric acid + ice 1 = Ice only N = Nitric acid S+1 = Sulfuric acid + ice S(M+1) = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None
 STATE PROGRAM (if any):
 E-mail: Y/N Fax? Y/N
 DATA PACKAGE: I II III IV
 QUOTE #: 3
 PO#: 3
 Turnaround Time Request:
 Standard 5 Business Days
 2 Business Day Rush
 Next Business Day Rush
 Same Day Rush (auth req.)
 Other: 00000



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

June 29, 2006

Curt Gorman
Qore Property Sciences
11420 Johns Creek Pkwy
Duluth, GA 30097

TEL: (770) 476-3555
FAX (770) 476-8930

RE: Ethel St.

Dear Curt Gorman:

Order No.: 0606E08

Analytical Environmental Services, Inc. received 2 samples on 6/23/2006 4:06:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative. Sample results are not dry weight corrected, unless if Pmoist analysis are requested on the chain of custody or other project specific arrangements have been made. AES' certifications are as follows:

- NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water, effective 06/01/05-06/30/06.
- AIHA Certification number 505 for analysis of Industrial Hygiene samples (Organics, Inorganics), Paint Chips, Soil and Dust Wipes, effective until 02/01/07.

These results relate only to the items tested. This report may only be reproduced in full and contains 7 total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.

Sincerely,

James Forrest
Project Manager

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client QORE, Inc.

Work Order Number 0606E08

Checklist completed by Harun Erdem Signature Date 6/23/06

Carrier name: FedEx UPS Courier Client US Mail Other

Shipping container/cooler in good condition? Yes No Not Present

Custody seals intact on shipping container/cooler? Yes No Not Present

Custody seals intact on sample bottles? Yes No Not Present

Container/Temp Blank temperature in compliance? (4°C±2)* Yes No

Cooler #1 4.4°C Cooler #2 Cooler #3 Cooler #4 Cooler #5 Cooler #6

Chain of custody present? Yes No

Chain of custody signed when relinquished and received? Yes No

Chain of custody agrees with sample labels? Yes No

Samples in proper container/bottle? Yes No

Sample containers intact? Yes No

Sufficient sample volume for indicated test? Yes No

All samples received within holding time? Yes No

Was TAT marked on the COC? Yes No

Proceed with Standard TAT as per project history? Yes No Not Applicable

Water - VOA vials have zero headspace? No VOA vials submitted Yes No

Water - pH acceptable upon receipt? Yes No Not Applicable

Adjusted? Checked by HE

Sample Condition: Good Other(Explain)

(For diffusive samples or AIHA lead) Is a known blank included? Yes No

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

Analytical Environmental Services, Inc.

Date: 29-Jun-06

CLIENT: Qore Property Sciences
 Lab Order: 0606E08
 Project: Ethel St.
 Lab ID: 0606E08-001A

Client Sample ID: MW-4
 Tag Number:
 Collection Date: 6/23/2006 3:00:00 PM
 Matrix: GROUNDWATER

Analyses	Result	Limit Qual	Units	BatchID	DF	Date Analyzed
METALS, TOTAL						
		SW6010B		(SW3010A)		Analyst: AO
Arsenic	BRL	0.0500	mg/L	72363	1	6/27/2006 5:05:07 PM
Barium	0.321	0.0200	mg/L	72363	1	6/27/2006 5:05:07 PM
Cadmium	BRL	0.00500	mg/L	72363	1	6/27/2006 5:05:07 PM
Chromium	BRL	0.0100	mg/L	72363	1	6/27/2006 5:05:07 PM
Lead	BRL	0.0100	mg/L	72363	1	6/27/2006 5:05:07 PM

Qualifiers:			
*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
BRL	Below Reporting Limit	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
N	Analyte not NELAC certified	P	NELAC analyte certification pending
Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: 29-Jun-06

CLIENT: Qore Property Sciences
 Lab Order: 0606E08
 Project: Ethel St.
 Lab ID: 0606E08-002A

Client Sample ID: MW-4 DUP
 Tag Number:
 Collection Date: 6/23/2006 3:05:00 PM
 Matrix: GROUNDWATER

Analyses	Result	Limit Qual	Units	BatchID	DF	Date Analyzed
METALS, TOTAL		SW6010B		(SW3010A)		Analyst: AO
Arsenic	BRL	0.0500	mg/L	72363	1	6/27/2006 5:09:13 PM
Barium	0.313	0.0200	mg/L	72363	1	6/27/2006 5:09:13 PM
Cadmium	BRL	0.00500	mg/L	72363	1	6/27/2006 5:09:13 PM
Chromium	BRL	0.0100	mg/L	72363	1	6/27/2006 5:09:13 PM
Lead	BRL	0.0100	mg/L	72363	1	6/27/2006 5:09:13 PM

Qualifiers:				
*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank	
BRL	Below Reporting Limit	E	Value above quantitation range	
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	
N	Analyte not NELAC certified	P	NELAC analyte certification pending	
Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits	Page 2 of 2

CLIENT: Core Property Sciences
 Work Order: 0606E08
 Project: Ethel St.

ANALYTICAL QC SUMMARY REPORT

TestCode: 6010B_TAL_W_T

Sample ID: MB-72363	Sample Type: MBLK	TestCode: 6010B_TAL_	Units: mg/L	Prep Date: 6/26/2006	RunNo: 86275						
Client ID:	Batch ID: 72363	TestNo: SW6010B		Analysis Date: 6/27/2006	SeqNo: 1712157						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	BRL	0.0500									
Barium	BRL	0.0200									
Cadmium	BRL	0.00500									
Chromium	BRL	0.0100									
Lead	BRL	0.0100									

Sample ID: LCS-72363	Sample Type: LCS	TestCode: 6010B_TAL_	Units: mg/L	Prep Date: 6/26/2006	RunNo: 86275						
Client ID:	Batch ID: 72363	TestNo: SW6010B		Analysis Date: 6/27/2006	SeqNo: 1712155						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	1.073	0.0500	1	0	107	85	115	0	0	0	
Barium	1.053	0.0200	1	0	105	85	115	0	0	0	
Cadmium	1.062	0.00500	1	0	106	85	115	0	0	0	
Chromium	1.077	0.0100	1	0	108	85	115	0	0	0	
Lead	1.052	0.0100	1	0	105	85	115	0	0	0	

Sample ID: 0606C40-001AMS	Sample Type: MS	TestCode: 6010B_TAL_	Units: mg/L	Prep Date: 6/26/2006	RunNo: 86275						
Client ID:	Batch ID: 72363	TestNo: SW6010B		Analysis Date: 6/27/2006	SeqNo: 1712161						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	1.079	0.0500	1	0	108	75	125	0	0	0	
Barium	1.086	0.0200	1	0.03928	105	75	125	0	0	0	
Cadmium	1.069	0.00500	1	0	107	75	125	0	0	0	
Chromium	1.089	0.0100	1	0	109	75	125	0	0	0	
Lead	1.052	0.0100	1	0	105	75	125	0	0	0	

Qualifiers:	B	Analyte detected in the associated Method Blank	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	N	Analyte not NELAC certified
	R	RPD outside accepted recovery limits	S	Spike Recovery outside accepted recovery limits		

CLIENT: Core Property Sciences
 Work Order: 0606E08
 Project: Ethel St.

ANALYTICAL QC SUMMARY REPORT

TestCode: 6010B_TAL_W_T

Sample ID: 0606C40-001AMSD	SampType: MSD	TestCode: 6010B_TAL_	Units: mg/L
Client ID: 72363	Batch ID: SW6010B	Prep Date: 6/26/2006	RunNo: 86275
		Analysis Date: 6/27/2006	SeqNo: 1712163

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	1.062	0.0500	1	0	106	75	125	1.079	1.53	20	
Barium	1.072	0.0200	1	0.03928	103	75	125	1.086	1.36	20	
Cadmium	1.051	0.00500	1	0	105	75	125	1.069	1.70	20	
Chromium	1.066	0.0100	1	0	107	75	125	1.089	2.13	20	
Lead	1.037	0.0100	1	0	104	75	125	1.052	1.45	20	

Qualifiers:

B Analyte detected in the associated Method Blank	BRL Below Reporting Limit	E Value above quantitation range
H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits	N Analyte not NELAC certified
R RPD outside accepted recovery limits	S Spike Recovery outside accepted recovery limits	



ANALYTICAL ENVIRONMENTAL SERVICES, INC
 3785 Presidential Parkway, Atlanta GA 30340-3704
 AES TEL.: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

CHAIN OF CUSTODY

Work Order: 0606E08

Date: 6/23/06 Page 1 of 1

#	SAMPLE ID	SAMPLED		Grab	Composite	Matrix (See codes)	ANALYSIS REQUESTED		REMARKS	No # of Containers
		DATE	TIME				PRESERVATION (See codes)			
1	MW-4	6/23/06	1500	V		GW				
2										
3	MW-4 Dup.	6/23/06	1505	V		BW				
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										

COMPANY: <u>GORP, Inc.</u>	ADDRESS: <u>11720 John Creek Pkwy</u>
PHONE: <u>770-476-3355</u>	<u>D-11h, GA 30077</u>
SAMPLED BY: <u>Curt Gorman</u>	FAX: <u>770-476-8930</u>
SIGNATURE: <u>[Signature]</u>	

RELINQUISHED BY: <u>[Signature]</u>	DATE/TIME: <u>6/23/06 11:00</u>	RECEIVED BY: <u>Brent Ammons</u>	DATE/TIME: <u>6/23/06 4:00</u>
PROJECT NAME: <u>Etape J.</u>	PROJECT #: <u>26450</u>	PROJECT INFORMATION	
SITE ADDRESS: <u>Etape St., Atl.</u>	SEND REPORT TO: <u>C. GORMAN</u>	INVOICE TO: (IF DIFFERENT FROM ABOVE)	
STATE PROGRAM (if any): <u>ASPA</u>	STATE PROGRAM (if any): <u>ASPA</u>	SHIPMENT METHOD	
E-mail? <u>Y</u> N	FAX? <u>Y</u> N	OUT / / /	VIA:
DATA PACKAGE: <u>I</u> II III IV	QUOTE #: <u>V</u>	IN <u>C</u> CLIENT	FedEx UPS MAIL COURIER
		OTHER	

Turnaround Time Request	<input checked="" type="radio"/> 0
Standard 5 Business Days	<input type="radio"/> 1
2 Business Day Rush	<input type="radio"/> 2
Next Business Day Rush	<input type="radio"/> 3
Same Day Rush (auth req.)	<input type="radio"/> 4
Other	<input type="radio"/> 5
Total # of Containers	<u>2</u>

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
 SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify)
 PRESERVATIVE CODES: H+1 = Hydrochloric acid + ice I = Ice only N = Nitric acid S+1 = Sulfuric acid + ice SM+1 = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

March 29, 2006

Curt Gorman
Qore Property Sciences
11420 Johns Creek Pkwy
Duluth, GA 30097

TEL: (770) 476-3555

FAX (770) 476-8930

RE: Howell Mill Rd.

Dear Curt Gorman:

Order No.: 0603D32

Analytical Environmental Services, Inc. received 5 samples on 3/23/2006 2:35:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative. Sample results are not dry weight corrected, unless if Pmoist analysis are requested on the chain of custody or other project specific arrangements have been made. AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water, effective 06/01/05-06/30/06.

-AIHA Certification number 505 for analysis of Industrial Hygiene samples (Organics, Inorganics), Paint Chips, Soil and Dust Wipes, effective until 02/01/07.

These results relate only to the items tested. This report may only be reproduced in full and contains 20 total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.

Sincerely,

James Forrest

Project Manager

Analytical Environmental Services, Inc.

Date: 29-Mar-06

CLIENT: Qore Property Sciences
Lab Order: 0603D32
Project: Howell Mill Rd.
Lab ID: 0603D32-004A

Client Sample ID: MW-04
Tag Number:
Collection Date: 3/22/2006 12:20:00 PM
Matrix: GROUNDWATER

Analyses	Result	Limit	Qual	Units	BatchID	DF	Date Analyzed
METALS, TOTAL							
		SW6010B			(SW3010A)		Analyst: BB
Arsenic	BRL	0.0500		mg/L	68971	1	3/28/2006 9:00:20 AM
Barium	0.0865	0.0200		mg/L	68971	1	3/28/2006 9:00:20 AM
Cadmium	BRL	0.00500		mg/L	68971	1	3/28/2006 9:00:20 AM
Chromium	BRL	0.0100		mg/L	68971	1	3/28/2006 9:00:20 AM
Lead	0.0110	0.0100		mg/L	68971	1	3/28/2006 9:00:20 AM

Qualifiers:	*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	N	Analyte not NELAC certified	P	NELAC analyte certification pending
	Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: 29-Mar-06

CLIENT: Core Property Sciences
 Work Order: 0603D32
 Project: Howell Mill Rd.

ANALYTICAL QC SUMMARY REPORT

TestCode: 6010B_TAL_W_T

Sample ID	MB-68971	SampType: MBLK	TestCode: 6010B_TAL_	Units: mg/L	Prep Date: 3/27/2006	RunNo: 81179					
Client ID:	68971	Batch ID: 68971	TestNo: SW6010B		Analysis Date: 3/28/2006	SeqNo: 1607148					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	BRL	0.0500									
Barium	BRL	0.0200									
Cadmium	BRL	0.00500									
Chromium	BRL	0.0100									
Lead	BRL	0.0100									

Sample ID	LCS-68971	SampType: LCS	TestCode: 6010B_TAL_	Units: mg/L	Prep Date: 3/27/2006	RunNo: 81179					
Client ID:	68971	Batch ID: 68971	TestNo: SW6010B		Analysis Date: 3/28/2006	SeqNo: 1607147					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	1.028	0.0500	1	0	103	85	115	0	0		
Barium	1.033	0.0200	1	0	103	85	115	0	0		
Cadmium	1.034	0.00500	1	0	103	85	115	0	0		
Chromium	1.052	0.0100	1	0	105	85	115	0	0		
Lead	1.034	0.0100	1	0	103	85	115	0	0		

Sample ID	0603D32-004AMS	SampType: MS	TestCode: 6010B_TAL_	Units: mg/L	Prep Date: 3/27/2006	RunNo: 81179					
Client ID:	MW-04	Batch ID: 68971	TestNo: SW6010B		Analysis Date: 3/28/2006	SeqNo: 1607151					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	1.001	0.0500	1	0	100	75	125	0	0		
Barium	1.036	0.0200	1	0.0865	95	75	125	0	0		
Cadmium	0.9784	0.00500	1	0	97.8	75	125	0	0		
Chromium	1.03	0.0100	1	0.001502	103	75	125	0	0		
Lead	0.9476	0.0100	1	0.01105	93.7	75	125	0	0		

Qualifiers:	B	Analyte detected in the associated Method Blank	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	N	Analyte not NELAC certified
	R	RPD outside accepted recovery limits	S	Spike Recovery outside accepted recovery limits		

CLIENT: Qore Property Sciences
Work Order: 0603D32
Project: Howell Mill Rd.
TestCode: 6010B_TAL_W_T
ANALYTICAL QC SUMMARY REPORT

Sample ID	0603D32-004AMSD	SampType:	MSD	TestCode:	6010B_TAL_	Units:	mg/L	Prep Date:	3/27/2006	RunNo:	81179
Client ID:	MW-04	Batch ID:	68971	TestNo:	SW6010B			Analysis Date:	3/28/2006	SeqNo:	1607152
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	1.006	0.0500	1	0	101	75	125	1.001	0.502	20	
Barium	1.036	0.0200	1	0.0865	95	75	125	1.036	0.00772	20	
Cadmium	0.9721	0.00500	1	0	97.2	75	125	0.9784	0.647	20	
Chromium	1.023	0.0100	1	0.001502	102	75	125	1.03	0.666	20	
Lead	0.9403	0.0100	1	0.01105	92.9	75	125	0.9476	0.775	20	

Qualifiers: B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 R RPD outside accepted recovery limits
 BRL Below Reporting Limit
 J Analyte detected below quantitation limits
 S Spike Recovery outside accepted recovery limits
 E Value above quantitation range
 N Analyte not NELAC certified



ANALYTICAL ENVIRONMENTAL SERVICES, INC
 3785 Presidential Parkway, Atlanta GA 30340-3704
 A.E.S. TEL.: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

CHAIN OF CUSTODY

Work Order: C602D32

Date: 3/23/06 Page 1 of 1

#	SAMPLE ID	DATE	TIME	SAMPLER	Grab	Composite	Matrix (See codes)	ANALYSIS REQUESTED		REMARKS	No # of Containers
								As, Ba, Cd, Cr, Pb	8260 V6c		
1	MW-01	3/22/06	1410	[Signature]	X		GN	N	N		2
2	MW-02		1420					X			2
3	MW-03		1320					X			2
4											
5	MW-04		1220					X			1
6											
7											
8											
9											
10											
11											
12											
13											
14											

Visit our website
 www.aesatlanta.com
 to check on the status of
 your results, place bottle
 orders, etc.

PROJECT NAME: Howell Mill Rd.
 PROJECT #: 26145A
 SITE ADDRESS: 115 Howell Mill Rd.
 SEND REPORT TO: Curt Gorman
 INVOICE TO: (IF DIFFERENT FROM ABOVE)
 SHIPMENT METHOD: CLIENT
 VIA: FedEx
 DATE/TIME RECEIVED BY: [Signature] 3/23/06 2:35
 RECEIPT
 Total # of Containers: 7
 Turnaround Time Request:
 Standard 5 Business Days
 2 Business Day Rush
 Next Business Day Rush
 Same Day Rush (auth req.)
 Other: 00000
 STATE PROGRAM (if any):
 E-mail: Y/N Fax: Y/N
 DATA PACKAGE: 0 I II III IV

COMPANY: GORE, INC.
 ADDRESS: 11729 Johns Creek Pkwy
Atlanta GA 30097
 PHONE: 770-355-3555
 SAMPLED BY: Curt Gorman
 SIGNATURE: [Signature]
 PHONE: 770-876-8930
 MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) O = Other (specify)
 PRESERVATIVE CODES: H+1 = Hydrochloric acid + ice I = Ice only N = Nitric acid S+1 = Sulfuric acid + ice S(MH) = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None
 SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO LAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
 SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

**APPENDIX E – GREENLEAF ENVIRONMENTAL GROUP
REMEDIAL COST ESTIMATE**



May 26, 2006

United Consulting
625 Holcomb Bridge Road
Norcross, GA 30071
Attention: Russ Griebel

RE: Unknown Lead Contaminated Site

Dear Russ:

After reviewing the information you provided on Wednesday, May 24, 2006 regarding the contamination at your site and some of the variables involved with treating and handling the waste, we have calculated the following budgetary estimates.

1. Provide a shoring wall 800' long to a depth of 35' against a possible DOT road - \$1,350,000.00.
2. Excavation, Treatment, and Disposal of Lead contaminated soil - \$125.00/ton.
3. Provide backfill, placement and compaction - \$19.50/ton.

These estimations are given without specific information regarding the property and are for budgetary estimates only.

Sincerely,

Greenleaf Environmental Group, Inc.

Jeff Sturgeon
Project Manager

APPENDIX F – AFFIDAVIT/NOTICES



Hartman, Simons,
Spielman & Wood, LLP

Alice D. Wilcox
Direct Dial: (770) 226-1330
Direct FAX: (770) 303-1123
E-MAIL: awilcox@hssw.com

May 24, 2006

VIA U.S. MAIL

Mr. Josh Lawson
Department of Natural Resources
Hazardous Sites Response Program
2 Martin Luther King Jr. Dr., SE
Suite 1462 East
Atlanta, Georgia 30334

**Re: Affidavit Recorded with Fulton County Superior Court Clerk
HIS Site #10637
1085 Howell Mill Road, NW
Atlanta, Fulton County, Georgia
HSSW File No. 10428-0001000**

Dear Mr. Lawson:

Enclosed please find a copy of the above referenced recorded Affidavit, which was filed and recorded May 16, 2006, with the Superior Court Clerk of Fulton County, Georgia, and of record at Deed Book 42589, page 464.

Please contact Clinton Cole directly at (770) 303-8450 with any questions, or the undersigned at your convenience.

Sincerely,

A handwritten signature in cursive script that reads "Alice D. Wilcox".

Alice D. Wilcox
Paralegal

Enclosure

cc: Mr. Angelo Viale (with enclosure)
Clinton Taw Cole, Esq. (with enclosure)
Mr. Russ Griebel (with enclosure)

Real Estate Transfer Tax \$0.00
Georgia Intangible Tax Paid \$0.00

Juanita Hicks
Clerk of Superior Court
Fulton County, Georgia

NOTE TO CLERK:
Please cross-reference to
Deed Book 23097, Page 337
Fulton County, Georgia Records.

After Recording Return To:

Clinton Taw Cole, Esq.
Hartman, Simons, Spielman & Wood, LLP
6400 Powers Ferry Road, N.W.
Suite 400
Atlanta, Georgia 30339

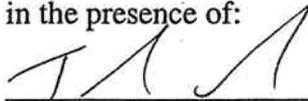
AFFIDAVIT

Welcome Years, Inc.
Howell Mill Road
Atlanta, Fulton County, Georgia
HSI No. 10637
Iron-Works International Inc.
1085 Howell Mill Road
Atlanta, Fulton County, Georgia

The property located at 1085 Howell Mill Road, Atlanta, Fulton County, Georgia has been listed on the State's Hazardous Site Inventory and has been designated as needing corrective action due to the presence of hazardous wastes, hazardous constituents, or hazardous substances regulated under state law.

IN WITNESS WHEREOF, this document has been signed and sealed by Property Owner this 16 day of May, 2006.

Signed, sealed and delivered
in the presence of:



Unofficial Witness

Iron-Works International, Inc.


By: Angelo Viale
Title: President
(CORPORATE SEAL)

AFFIDAVIT

Personally appeared before the undersigned authority, Anthony Viale (the affiant) who on oath states that he is an officer of the above named Property Owner with the title designated hereinabove; that he is fully authorized to execute the within and above instrument on behalf of Property Owner and thereby bind Property Owner thereto; and that the facts stated, and the representations and warranties made by Property Owner in the within and foregoing instrument are true and correct.

Sworn to and subscribed before me this 16th day of May, 2006.



Notary Public

My commission expires: **JERALDINE S. WELLS**
Notary Public, Fulton County, Georgia
My Commission Expires Nov. 16, 2007



Rec'd.
MAY 23 2006