



Infrastructure · Water · Environment · Buildings

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Georgia EPD

APR 3 2014

Response and Remediation Program

Mr. Derrick Williams
Response and Remediation Program
Georgia Environmental Protection Division
2 Martin Luther King, Jr., Drive, SE
Suite 1154, East Tower
Atlanta, GA 30334

Subject:
Initial HSRA Release Notification
Former Repair Shop
1340 Gordon Highway
Augusta, Georgia 30901

Dear Mr. Williams:

On behalf of General Electric Company, enclosed is an initial Hazardous Site Response Act (HSRA) Release Notification for the above-referenced site. At this time, the only known regulated constituent exceeding the HSRA Notification Concentration (NC) at the site is benzo(a)pyrene in soil. No regulated constituents were detected above background in groundwater samples collected at the site.

This notification provides soil and groundwater data from recent investigation activities performed at the site in July and August 2013. Benzo(a)pyrene and lead were detected in soil samples at concentrations above the HSRA NC in the initial investigation, and an additional investigation was conducted to delineate the extent of these constituents in soils above the NC. Benzo(a)pyrene concentrations observed in soil were low and are not known to be site-related. Lead concentrations in soil were also low and are not thought to be site-related; however, former sand-blasting activities at the site did produce residue with containing certain metals, including lead. Any sand blast residue was previously cleaned up in the 1990s, and as an additional conservative measure, soil containing lead above the NC was recently excavated as described below.

A site restoration event was conducted from February 26 through February 28, 2014 to excavate the soil containing lead above the HSRA NC, and remove all visible debris observed on the ground surface. Soil and surface debris were removed and disposed of at an appropriate off-site facility. Previous investigation and cleanup activities were also conducted at the site in the mid-1990s as discussed in the attached site summary.

Imagine the result

g:\common\mip\ge\augusta\2014 files\release notification\1 - final\1 - release notification cover letter 4 2 14 docx

ARCADIS U.S., Inc.
801 Corporate Center Drive
Suite 300
Raleigh
North Carolina 27607
Tel 919 854 1282
Fax 919 854 5448
www.arcadis-us.com

ENVIRONMENTAL

Date:
April 2, 2014

Contact:
Matthew Pelton

Phone:
919.415.2308

Email:
Matthew.Pelton@arcadis-us.com

Our ref:
B0031251

A reportable quantity screening method (RQSM) evaluation was conducted for the on-site pathway for residual benzo(a)pyrene and results indicate that a reportable quantity has not been released at the site. In addition, the RQSM for the groundwater pathway for a potential future release did not indicate a reportable quantity has been released.

The soil investigation and clean-up of this site was completed as preparation for an anticipated real estate transaction. Based on the RQSM scoring, which indicates a reportable quantity has not been released, GE requests a No-Listing letter for the site.

Sincerely,

ARCADIS U.S., Inc.



Matthew T. Pelton, PE
Senior Environmental Engineer

Copies:

Bob Witsell, GE

Enclosures

Release Notification/Reporting Form
Site Summary
Site Map (Figure 1)
USGS Topo Map
RQSM Scoring Summary
Laboratory Reports (on CD)

6189.

RELEASE NOTIFICATION/REPORTING FORM

Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION

Hazardous Sites Response Program

Suite 1462, Floyd Tower East

2 Martin Luther King Jr. Drive, SE

Atlanta, Georgia 30334-9000

RECEIVED
Georgia EPD



1. The information provided in this form is for:

- ☒ Initial Release Notification
☐ Supplemental Notification

APR 3 2014

PART I -- PROPERTY INFORMATION

Response and Remediation Program

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	GAD984279612				
3	Tax Map and Parcel ID Number:	073-0-040-00-0	Acreage	5.14		
4	Site or Facility Name	Former Repair Shop				
5	Site Street Address	1340 Gordon Highway				
6	Site City	Augusta	County	Richmond	Zip	30901
7	Property Owner	General Electric Company				
8	Property Owner Mailing Address	1935 Redmond Circle				
9	Property Owner City	Rome	State	GA	Zip	30165
10	Property Owner Telephone No.	706.291.3319				
11	Site Contact Person	Robert Witsell	Title	Project Manager		
12	Site Contact Company Name	General Electric Company				
13	Site Contact Mailing Address	1935 Redmond Circle				
14	Site Contact City	Rome	State	GA	Zip	30165
15	Site Contact Telephone No.	706.291.3319				
16	Facility Operator Contact Person	N/A Contact Owner	Title			
17	Facility Operator Company Name	N/A				
18	Facility Operator Mailing Address	N/A				
19	Facility Operator City	N/A	State		Zip	
20	Facility Operator Telephone No.	Owner Telephone No. 706.291.3319				

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Robert Witsell	Project Manager
NAME (Please type or print)	TITLE
<i>Robert J. Witsell</i>	4/2/14
SIGNATURE	DATE

PART II -- RELEASE INFORMATION

Page 1 of 4

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

- 1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:**

The source of the release is unknown.

- 2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):**

The release date, physical state of released material, and quantity of the material released are unknown.

- 3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).**

Investigation activities were performed on July 11-12, 2013 and August 16, 2013. Sixteen soil borings and four monitoring wells were installed, sampled, and analyzed for VOCs (EPA Method 8260), SVOCs (EPA Method 8270), PCBs (EPA Method 8082), TPH-DRO, TPH-GRO, TPH-ORO and RCRA Metals (EPA Method 6010). Benzo(a)pyrene and lead were detected in soil samples at concentrations above the HSRA notification concentrations (NCs). Levels of Benzo(a)pyrene in soil are low and not known to be related to past site activities. No regulated constituents were detected in the groundwater samples at concentrations above background.

A soil removal event was conducted from February 26 through February 28, 2014 to excavate soils with lead concentrations above the HSRA NC. In addition, all visible debris was removed and disposed of at an appropriate off-site facility. A total of 18.35 tons of non-hazardous soil and debris were disposed of at the Waste Management Pine Bluff Landfill in Ball Ground, Georgia.

A previous remedial event was performed at the site in 1994 to address sand blast residue. The 1994 cleanup included the removal of accumulated sand-blast residues and affected soils, hard surface cleaning, and site restoration.

- 4. Access to the area affected by the release. Check the appropriate box:**

- ☐ Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
☒ Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
☐ Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

Two sides of the property are fenced, other sides of the property are wooded or sloped making access difficult.

- 5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.**

- ☐ A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
☐ An engineered and maintained earthen material or compacted fill or a high density synthetic material
☐ Loose earthen fill or native soil
☐ No cover
☒ Other Vegetative

Describe the type and thickness of the material covering the contaminated soil or wastes.

Vegetative ground cover includes grass, vines, brush, and/or trees.

PART II -- RELEASE INFORMATION

(Continued)

Page 2 of 4

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

☐ Less than 300 feet

☐ 301 to 1000 feet

☐ 1001 to 3000 feet

☐ Greater than 1 mile

☒ 3001 to 5280 feet

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: Tender Love & Care Child Care

Address: 1271 Gordon Hwy, Augusta, GA 30901

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

☐ Less than 0.5 miles

☐ 0.5 to 1 mile

☒ 1 to 2 miles

☐ 2 to 3 miles

☐ Greater than 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: A water well survey out to three miles was not conducted because no regulated constituents were detected in groundwater above background. An EDR water well search and a windshield survey conducted by ARCADIS did not report any drinking water wells within 1 mile of the site.

Address: No known drinking water wells within 1 mile of the site.

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

☐ Yes

☒ No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

Page 3 of 4

[illegible]

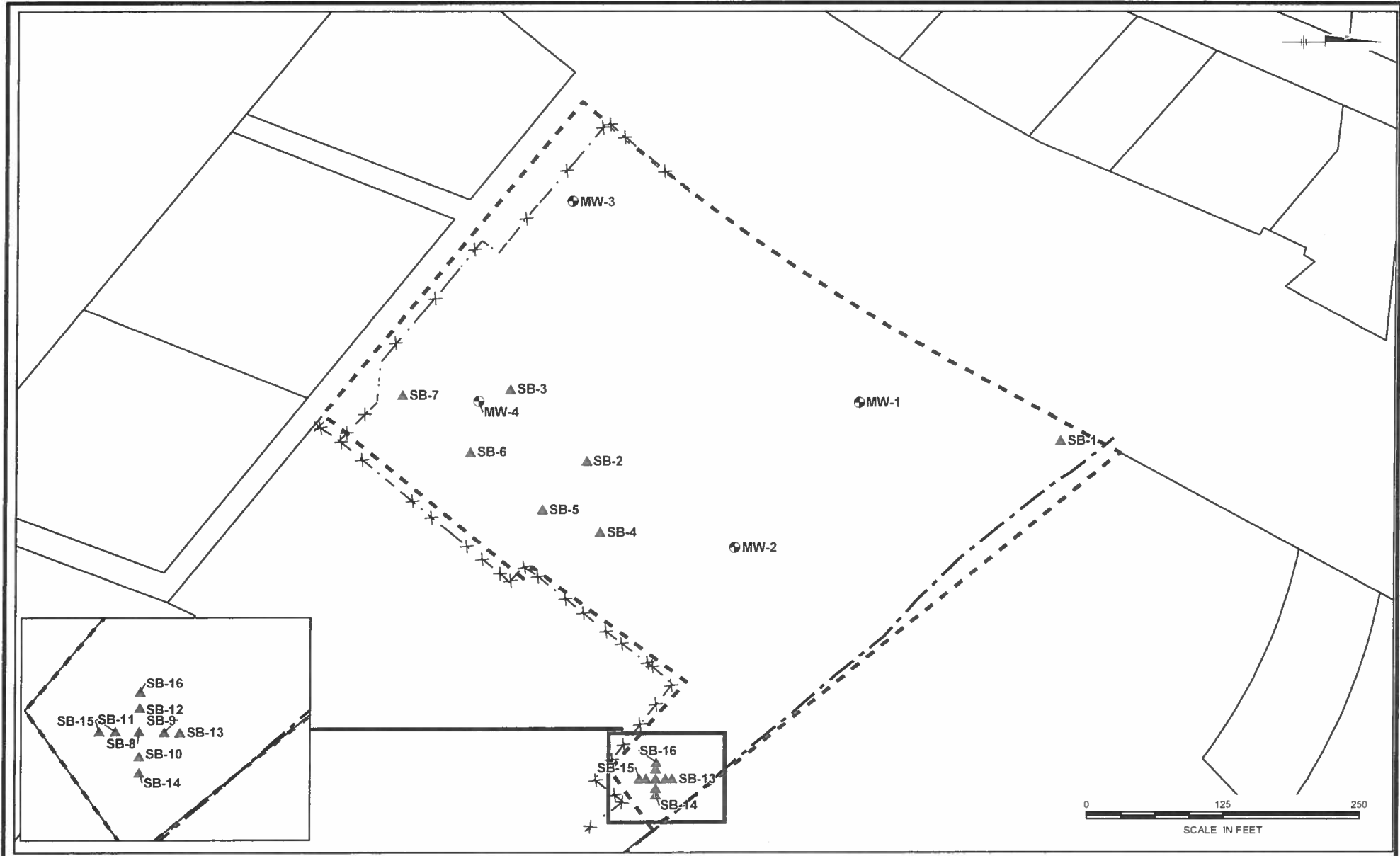
PART IV -- GROUNDWATER RELEASE INFORMATION

Page 4 of 4

Please provide the following information for EACH regulated substance released to the groundwater at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

Regulated Substance	CAS Registry Number	Highest Detected Concentration (Specify Units)	Sample Depth Below Ground Surface (Feet)
None Detected Above Background			

\\BREVILLE\ENR\GROUPS\ENR\08_13_12\GIS\PROJECTS\ENV\ENV_13\GA\Augusta_Ga\Phase_1\JIF1_SITE_MAP_R.mxd
 CT: PATR ZUGISPROJECTS\ENV\ENV_13\GA\Augusta_Ga\Phase_1\JIF1_SITE_MAP_R.mxd



- LEGEND:**
- ⊕ Monitoring Well
 - ▲ Soil Boring
 - ✕ Fence
 - Drainage Ditch
 - ⬡ Approximate Site Boundary (Richmond County GIS, 2012)
 - ▭ Parcel Boundary

GENERAL ELECTRIC 1340 GORDON HWY, AUGUSTA, GA	
SITE MAP	
	FIGURE 1

Preliminary Reportable Quantity Screening
Former Repair Shop
1340 Gordon Highway
Augusta, Richmond County, Georgia

GROUNDWATER PATHWAY SCORE

	Calc No.	Assigned Value	Potential Scores
A Has a release occurred	A	5	0, 5, 10, 45
B Route Characteristics			
1 b Susceptibility Rating	1b	3	0, 3, 6
2 b Physical State	2b	1	0, 1, 2, 3
C Containment	C	3	0, 1, 2, 3
D Release Characteristics			
1d Regulated Substance	1d	benzo(a)pyrene	0, 1, 2, 3, 4, 8, 16
2d Toxicity	2d	16	1, 2, 3, 4, 5, 6, 7, 8
3d Quantity	3d	2	
E Targets			0, 1, 2, 3, 4, 8, 12, 15, 18, 20, 25
1e Exposure to groundwater release	1e	1	25
2e Distance to well or spring (mile)	2e	4	0, 1, 4, 9, 16
$S_{gw} =$		3.46	10

CALCULATIONS

M = 17

Threshold

FORMULA

$$S_{gw} = M \times ((2d+3d) \times (1e+2e)/442.8)$$

where $M = A + (1b + 2b) \times C$

If A = 45, then M = 45

If 2d is unknown, then 2d = 4

If 3d is unknown, then 3d = 4

If 1e included known or suspected human exposure, then 2e = 16

If 1e = 0, then 2e = 1

ON-SITE PATHWAY SCORE

	Calc No.	Assigned Value	Potential Scores
A Access to site	A	2	0, 2, 4
B Has there been a release	B	25	0, 15, 25
C Containment	C	5	0, 1, 2, 3, 4, 5
D Release Characteristics			
1d Regulated Substance	1d	benzo(a)pyrene	0, 1, 2, 3, 4, 8, 16
2d Toxicity	2d	16	1, 2, 3, 4, 5, 6, 7, 8
3d Quantity	3d	2	
E Targets			1, 2, 4, 6, 8
1e Distance to Individual	1e	2	0, 1
2e Is there an onsite sensitive enviro	2e	0	
$S_o =$		8.3	20

Threshold

FORMULA

$$S_o = A \times (B+C) \times (2d+3d) \times (1e + 2e)/259.2$$

If A or B = 0, then $S_o = 0$

If 2d is unknown, then 2d = 4

If 3d is unknown, then 3d = 4



MANAGEMENT CO.

Jeffrey A. Miller, P.E., BCEE
Environmental Engineer

Direct Dial: (614) 559-2458
millerje@whitecastle.com

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Georgia EPD

April 3, 2014

APR 4 2014

Georgia Environmental Protection Division
Hazardous State Response Program
Suite 1462, Floyd Tower East
2 Martin Luther King Drive, SE
Atlanta, Georgia 30334-9000

Response and Remediation Program

**RE: Letter of Transmittal Release Notification/Reporting From for Former PSB Co.
Plant 1 Superior Boulevard, Rome, Georgia**

To Whom it May Concern:

Enclosed is the completed Release Notification/Reporting Form and supplementary information for the former PSB Co. Rome Georgia plant located at 1 Superior Boulevard, Rome, Georgia.

The PSB Co. plant ceased production in December of 2012. In September of 2013 Wright Metal Products Crates LLC, 111 Franklin Street, Lavonia, Georgia 30553 (WMP), leased the facility and began production operations.

WMP contracted with Peachtree Environmental, 3000 Northwoods Parkway, Suite 105, Norcross, Georgia 30071 (Peachtree) to perform Phase I and Limited Phase II (Phase I & II) investigations for acquiring the facility. Two sampling events were performed because of identifying arsenic in soil and lead in groundwater above the Georgia Environmental Protection Division "Appendix I Regulated Substances and Soil Concentrations That Trigger Notification," (Ga EPD Reporting Limits).

The first round of groundwater samples collected February 14, 2014 were not filtered and it is believed the lead resulted from the nitric acid preservative dissolving lead from the silt in the groundwater sample.

HOME OFFICE 555 WEST GOODALE STREET COLUMBUS, OHIO 43215-1158
MAIL P.O. BOX 1498 COLUMBUS OH 43216-1498

Our quest is excellence and standard setting leadership in each of our industries.



Georgia Environmental Protection Division
April 3, 2014
Page 2

A second round of soil and groundwater sampling was performed March 12, 2014 because it was believed the arsenic is natural background and the lead resulted from the sampling technique. Peachtree contacted Mr. Stan Bearden, a Professional Geologist experienced in mining in the Coosa Valley area for his experience with metals in soils. He confirmed that naturally occurring lead and arsenic often exceed 200-300 and 100 ppm, respectively. Peachtree also found a book by Vernon Hurst entitled, "Sulfide Deposits in the Coosa Valley, Georgia," supporting the premise of naturally occurring metals in the Coosa Valley were higher than generally found in other parts of Georgia and could range in the 100's ppm for lead and in excess of 100 ppm for arsenic. Figure 3 attached to the Release Notification/Reporting Form illustrates the results of the two sampling events.

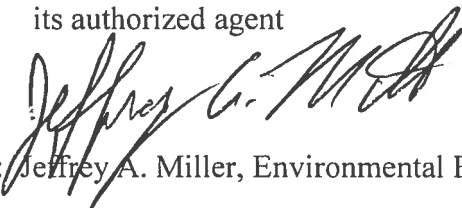
As shown on Figure 3, the highest arsenic concentration in shallow soil samples was 70.7 mg/kg between grade to 24 inches. The highest concentration was 125 mg/kg between 8-10 feet below ground surface. Based on the modifications made to the topography there has never been any disturbance to the soils at the 8 to 10 foot level below ground surface. Additionally, there is no known source of these metals based on the Phase I history of the operation. It is believed the arsenic concentration is naturally occurring.

WMP is planning to purchase this property and wanted the Release Notification/Reporting Form submitted to the Georgia EPD for review and concurrence that the soil and groundwater results are naturally occurring and thus no further investigation is warranted.

Sincerely,

White Castle System, Inc.
A Delaware Corporation

By: White Castle Management Co.,
its authorized agent


By: Jeffrey A. Miller, Environmental Engineer

c: Brian Walkerly, White Castle
Denny Dobbs, Peachtree Environmental
Michael Donnelly, Wright Metal Products Crates
Clyde Edwards, Wright Metal Products Crates

Enclosure

6192.

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
Hazardous Sites Response Program
Suite 1462, Floyd Tower East
2 Martin Luther King Jr. Drive, SE
Atlanta, Georgia 30334-9000

RECEIVED
Georgia EPD

APR 4 2014

1. The information provided in this form is for:
- ☒ Initial Release Notification
☐ Supplemental Notification

Response and Remediation Program

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	GAR000031419				
3	Tax Map and Parcel ID Number:	Old Map 574 016 Parcel I16Z 014	Acreage	6.0		
4	Site or Facility Name	PSB Co.				
5	Site Street Address	1 Superior Drive				
6	Site City	Rome	County	Floyd	Zip	30161-
7	Property Owner	White Castle System, Inc.				
8	Property Owner Mailing Address	555 West Goodale Street				
9	Property Owner City	Columbus	State	Ohio	Zip	43215
10	Property Owner Telephone No.	614-559-2458				
11	Site Contact Person	Jeffrey Miller	Title	Environmental Engineer		
12	Site Contact Company Name	White Castle Management Co.				
13	Site Contact Mailing Address	555 West Goodale Street				
14	Site Contact City	Columbus	State	Ohio	Zip	43215
15	Site Contact Telephone No.	614-559-2458				
16	Facility Operator Contact Person	Jeffrey Miller	Title	Environmental Engineer		
17	Facility Operator Company Name	PSB Co.				
18	Facility Operator Mailing Address	555 West Goodale Street				
19	Facility Operator City	Columbus	State	Ohio	Zip	43215
20	Facility Operator Telephone No.	614-228-5781				

21. CERTIFICATION —I certify under penalty of law that I am the owner of the real property described in this Release Notification and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

White Castle System, Inc.

by *Jeffrey A. Miller*
NAME (Please type or print)
SIGNATURE

Environmental Engineer

TITLE

4/3/2014
DATE

PART II -- RELEASE INFORMATION

Page 2 of 13

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:

There is no known source. The natural soils in the Coosa Valley have naturally occurring levels of many regulated metals which are near or exceed the Georgia reportable levels. As part of a Limited Phase II Environmental Site Assessment, Peachtree Environmental (Buyer's Consultant) contacted Mr. Stan Beardon, a Professional Geologist experienced with mining in the Coosa Valley area was contacted by Peachtree Environmental for his experience. Mr. Beardon confirmed that naturally occurring lead (Pb) and Arsenic (As) often exceed 200-300 and 100 ppm respectively. Further, a book by Vernon Hurst entitled "Sulfide Deposits in the Coosa Valley, Georgia" supports the premise that naturally occurring metals in the Coosa Valley were higher than generally found in other parts of Georgia and could range into the 100's ppm for lead and in excess of 100 ppm for arsenic samples.

2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):

No known release date since this is believed natural conditions.

3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).

Two soil and groundwater sampling events were performed to affirm the belief the first results were natural conditions. No other actions are needed.

4. Access to the area affected by the release. Check the appropriate box:

- ☐ Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
- ☐ Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
- ☒ Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.

- ☐ A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
- ☐ An engineered and maintained earthen material or compacted fill or a high density synthetic material
- ☐ Loose earthen fill or native soil
- ☐ No cover
- ☒ Other

Describe the type and thickness of the material covering the contaminated soil or wastes.
Since the soil conditions are natural no cover is needed.

PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 13

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

☐ Less than 300 feet
☐ 301 to 1000 feet

☒ 1001 to 3000 feet
☐ 3001 to 5280 feet

☐ Greater than 1 mile

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: Bank of America, 7105 Corporate Drive, Plano, TX 75024

Address: 45 The Trail, Lindale, GA

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

☐ Less than 0.5 miles
☐ 0.5 to 1 mile

☐ 1 to 2 miles
☐ 2 to 3 miles

☐ Greater than 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: _____

Address: _____

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

☐ Yes

☒ No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

General Description of the Property

The site is a 6.0 acre generally rectangular parcel located at the southeast corner of the intersection of Superior Boulevard SE and Industrial Boulevard SE. The Site is developed with the PSB Company facility. It is currently leased by Wright Metal Products Crates (WMP) and is operating as a metal crate fabrication and dry painting facility. The current steel on concrete slab building contains approximately 64,000 square feet of office and manufacturing space; of which approximately 5,000 square feet is office space. The facility is surrounded by industrial facilities:

1. North – Industrial Blvd and Steel King Industrial;
2. South – Chem Air America, industrial facility;
3. East – F&P Georgia, manufacturer of car parts for Honda;
4. West – Superior Dr. SE and Packaging Products.

The nearest residence is 1,565 feet to the east at 45 The Trails which is presumably up-gradient based on the topography. The nearest school is the Georgia Highlands College 3175 Cedartown Highway, S.E. Rome, Georgia 30161-3897. Figure 1 is a USGS Topographic Map for the facility and the surroundings. Figure 2 illustrates the distances to the nearest residence and Georgia Highlands College.

Initially on February 14, 2014 groundwater samples were analyzed for total RCRA metals and VOC's. These samples were preserved with nitric acid (HNO₃). These are designated GW-1 through GW-3. This sampling event resulted in a slight exceedance of the Georgia EPD reporting limit for lead, which is 0.015 parts per million (ppm), in GW-1 and GW-2. The results were 0.0704 and 0.0222 respectively (See Attached Figure 3). It is suspected that fine silt from the "silty chert" type soil caused particulate metals to be dissolved by the HNO₃ giving an artificially high result.

Subsequently, on March 12, 2014, three replacement wells were installed essentially in the same location as the three initial groundwater wells about 2 feet away and designated with an, "R". Collected groundwater samples were analyzed for dissolved Pb and As. "Dissolved" means that no particulates were dissolved with HNO₃ preservation. The March 12, 2014 sample analytical results were below reportable limits (BRL) for both Pb and As.

Soil samples were collected initially on February 14, 2014 laboratory for analysis. These are soil samples SB-1 through SB-4. The soil samples collected at SB-3 and SB-4 had levels of As at 125 and 70.7 ppm respectively, which exceeds the Georgia EPD notification level of 41.0 ppm. Also, SB-3 had an acetone detection of 130 ppm, which exceeded its reporting concentration. This exceedance is explained by the lab as a lab contaminant.

Following these results Peachtree Environmental contacted Mr. Stan Bearden, a professional geologist experienced in mining in the Coosa Valley (Rome) for his experience with natural concentrations. He confirmed that naturally occurring Pb and As often exceeded 200-300 and 100 ppm respectively. Further, a book by Vernon Hurst entitled "Sulfide Deposits in the Coosa Valley, Georgia" supported the premise that naturally occurring metals in the Coosa Valley were higher than generally is found in other parts of Georgia and could range into the 100's ppm for Pb and in excess of 100 ppm for As.

Subsequently, four additional soil samples were collected around the Site perimeter from unused areas, and two were collected offsite for reference. These soil samples are designated SB-5 through SB-10. SB-9 and SB-10 were to help establish some, "background" concentrations. The six additional soil samples had Pb and As ranging in value as follows: Pb-31 to 94 ppm and As-17 to 53.6 ppm.

Based on evaluation of the Subject Property and Coosa Valley Area natural conditions and the historical use of the Property, it is Peachtree's conclusion that the soil and groundwater results reported do not constitute any REC's.

The natural soils in the Coosa Valley have naturally occurring levels of many regulated metals which are near or exceed Georgia reportable levels. (See references earlier in this section). Likewise, the soil type (silty chert) has fine particulates which can contribute to unexpectedly elevated groundwater metal readings if the samples are not clear of fine particles almost to drinking water quality, and if they are preserved with HNO₃.

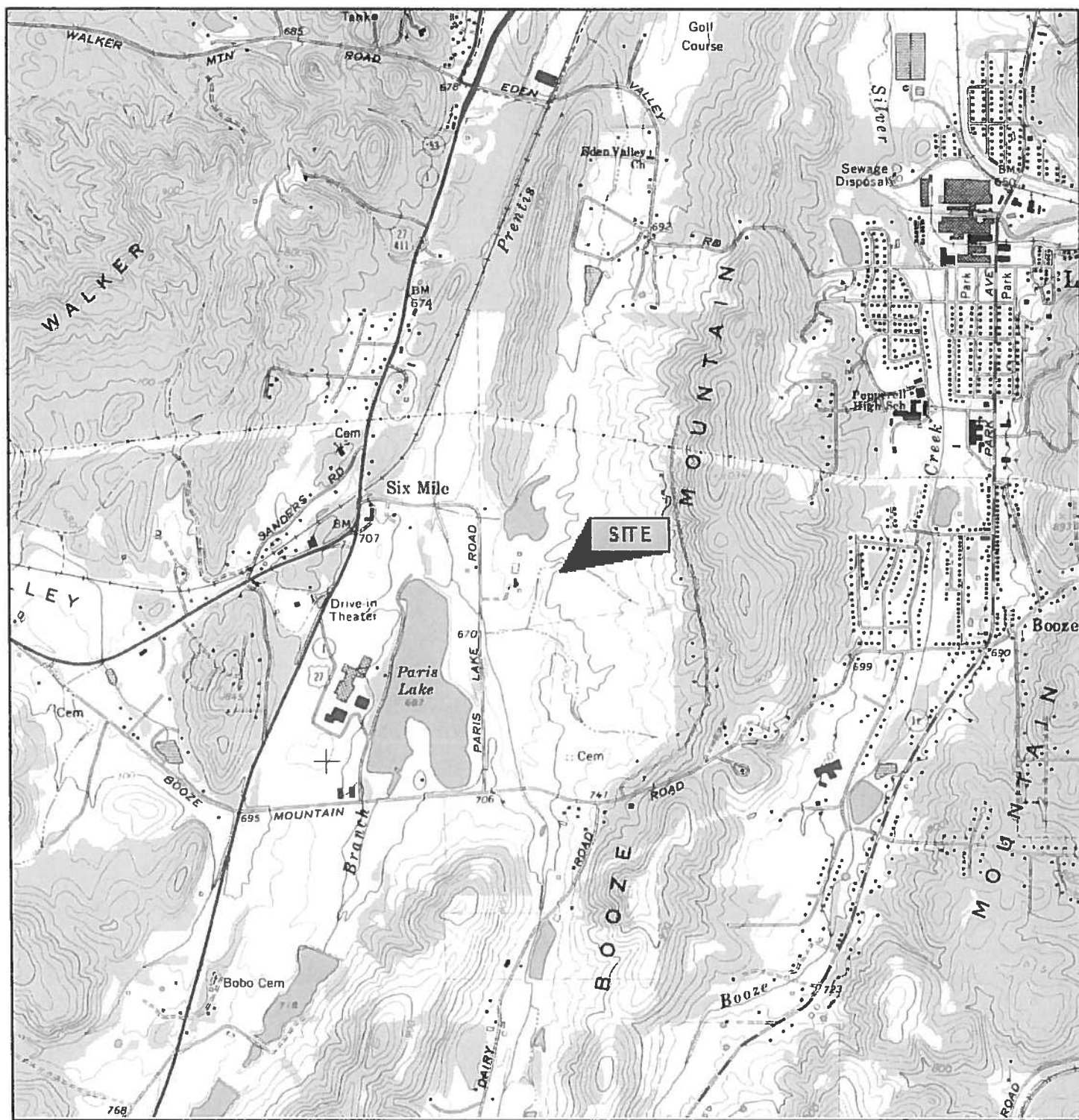
The March 12, 2014 samples indicate that dissolved metals analyses, which eliminates particulate metal, are BRL for Pb and As, and therefore are below Georgia EPD notification levels. Also, arsenic levels found on the Site are representative of natural conditions occurring in the soils of the Coosa Valley area.

Groundwater well information was obtained from Environmental Data Resources (EDR) in The EDR Radius Map™ Report with GeoCheck®. Figure 4 illustrates the well locations along with a narrative on the records reviewed.

It is Peachtree Environmental's and White Castle's belief that no further investigation is warranted.

Figure 1 USGS Map

Historical Topographic Map



<p>N ↑</p>	<p>TARGET QUAD NAME: ROME SOUTH MAP YEAR: 1985 PHOTOREVISED FROM : 1968 SERIES: 7.5 SCALE: 1:24000</p>	<p>SITE NAME: Wright Metal Products Crates ADDRESS: 1 Superior Boulevard Rome, GA 30161 LAT/LONG: 34.1746 / -85.1972</p>	<p>CLIENT: Peachtree Environmental CONTACT: Virginia M. Holland INQUIRY#: 3845858.4 RESEARCH DATE: 02/04/2014</p>
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Figure 2
Google Earth Map Showing Distances to Nearest Residence and School

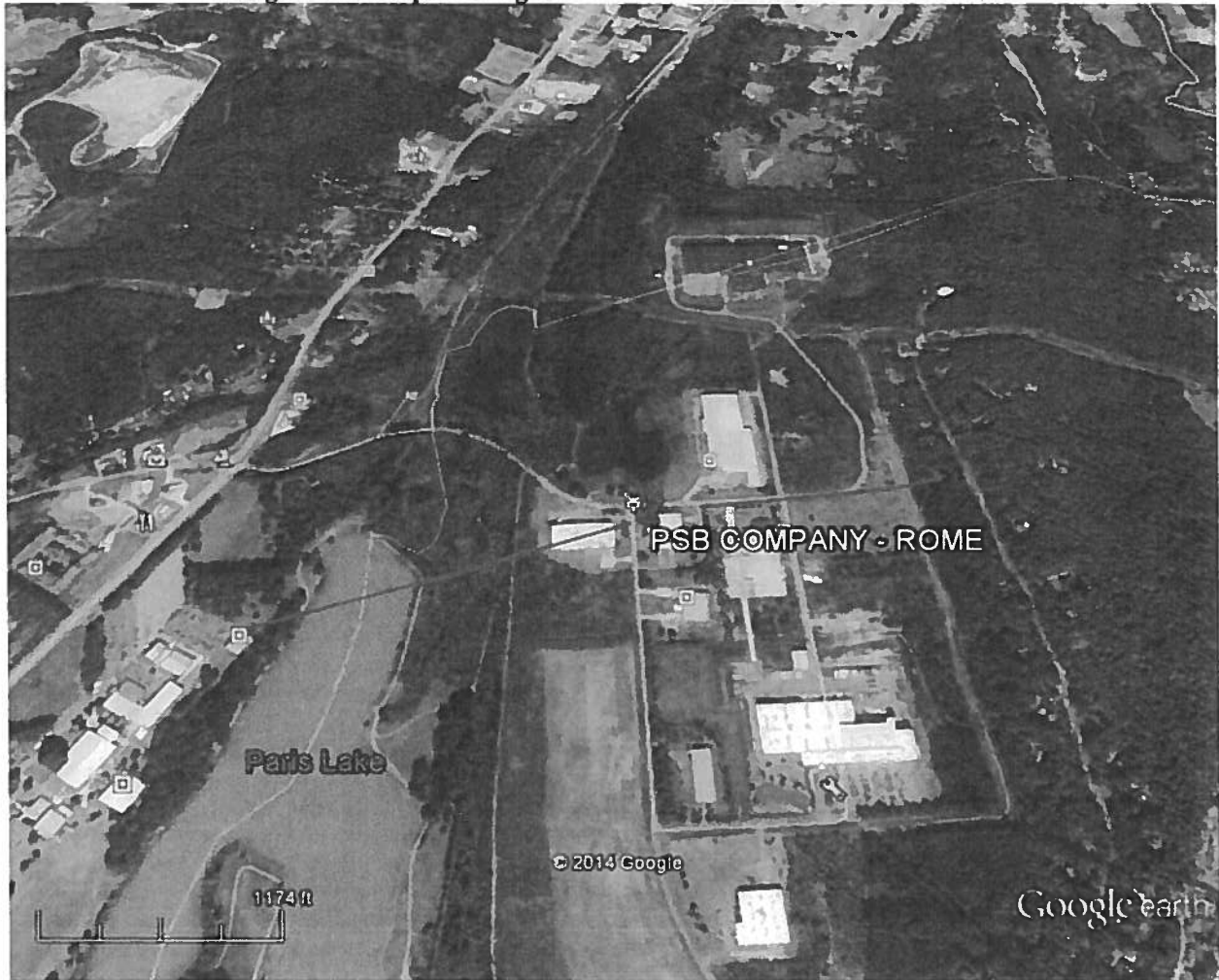


Figure 3
Site Plan Illustrating Sampling Locations and Results

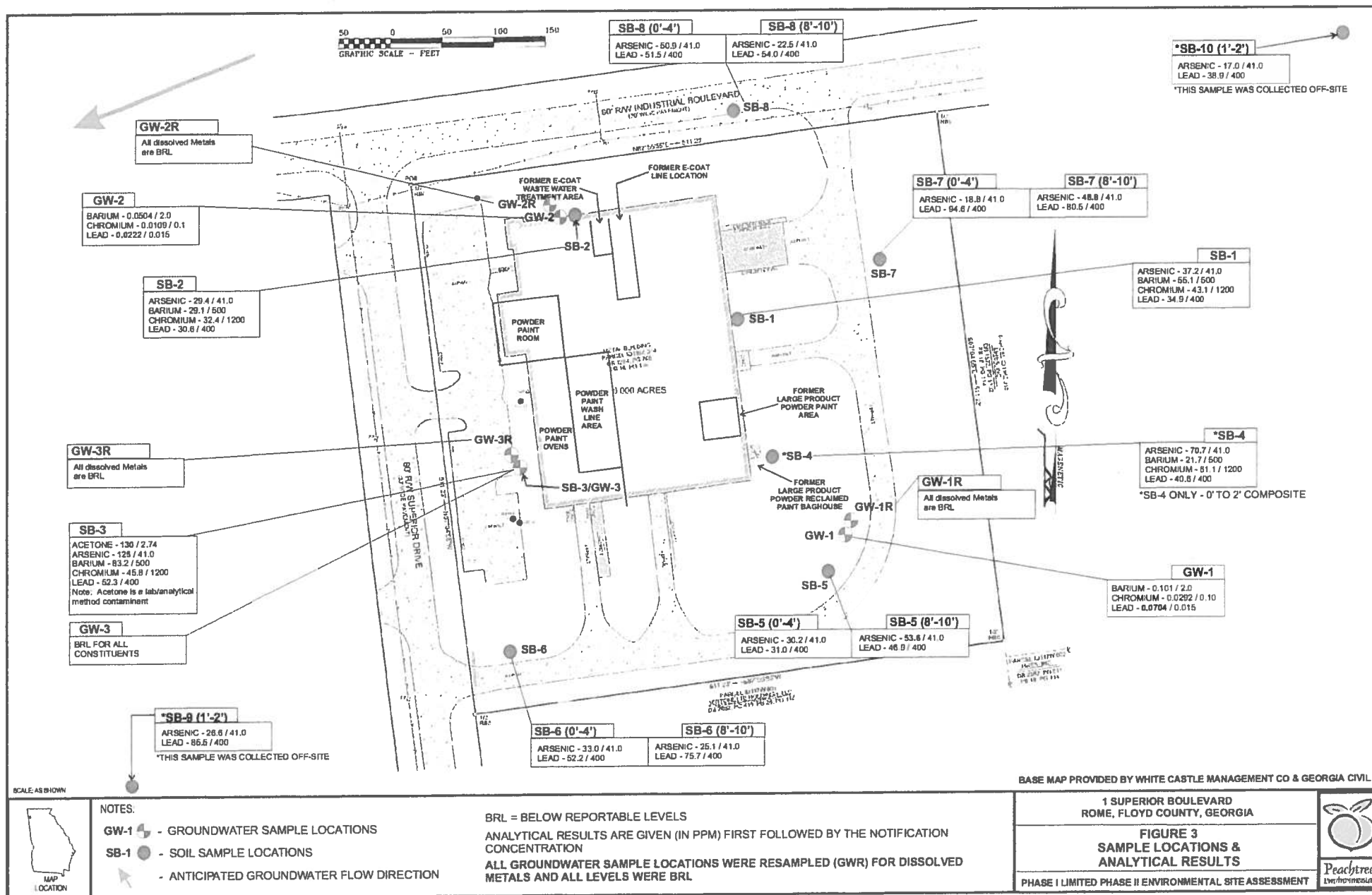
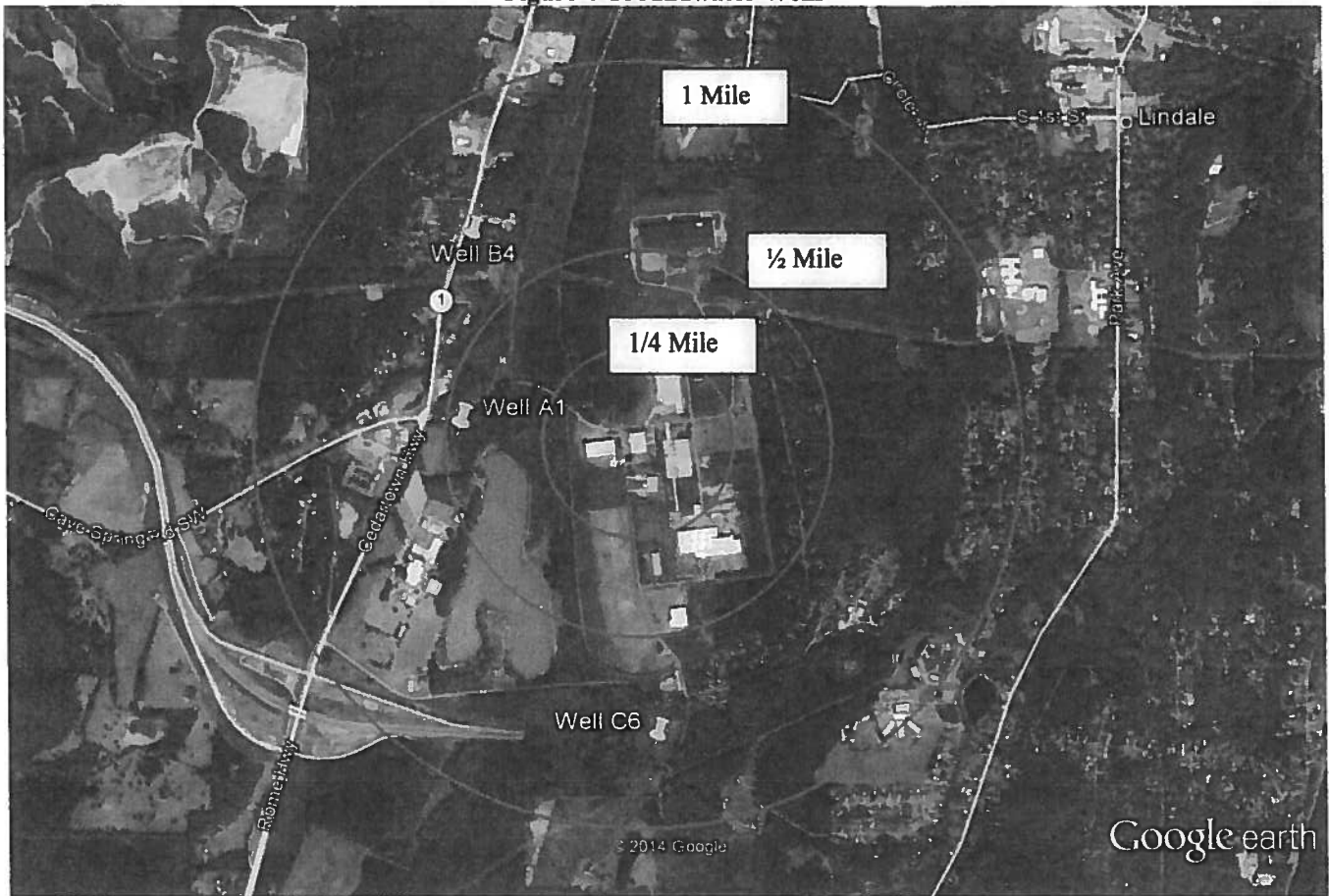


Figure 4 Groundwater Wells



Three groundwater wells were identified.

Well A1 is nearly 1/2 mile from the facility. It is reported as both A1 and A2 originally completed in 1960 and presumably associated with the Mrs. Lucille Davis property. A search of the records indicate the property is now owned by Georgia Highlands College and the property is undeveloped as indicated on the map above. This well is on the west side of the normal surface water flow towards the Etowah River.

Well B3 is reported as B3 and B4. This well is between 1/2 and 3/4 miles from the property and is on the west side of the surface flow to the north to the Etowah River. This property is owned by Andrey Kay Smith as indicated by the Floyd County Tax Assessors Office.

Well C5 and C6 is 1/2 and 3/4 of a mile from the property. The Floyd County Tax Assessors office and property maps indicate this well is also likely no longer there as it is in the right of way for realignment of US Route 411 and Ga. State Route 53. This well is also cross up-gradient to cross-gradient.

The well records search includes local/regional water well agency records including Public Water Systems, USGS Water wells, Georgia Public Supply Wells, USGS Georgia Water Wells, and DNR Managed Lands.

EDR was also consulted to make an additional inquiry into whether the records were current.

These wells are not material as a result of the topography, hydrogeology, and the distances from the facility.

**Analytical Laboratory Reports
February 14, 2014 and March 12, 2014**

PART III -- SOIL RELEASE INFORMATION

Page 12 of 13

Please provide the following information for EACH regulated substance released to the soil at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

[illegible]

PART IV -- GROUNDWATER RELEASE INFORMATION

Page 13 of 13

Please provide the following information for EACH regulated substance released to the groundwater at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

[illegible]



State of Florida

Department of Health, Bureau of Public Health Laboratories
This is to certify that



E87582

ANALYTICAL ENVIRONMENTAL SERVICES, INC.
3080 PRESIDENTIAL DRIVE
ATLANTA, GA 30340

has complied with Florida Administrative Code 64E-1,
for the examination of environmental samples in the following categories

DRINKING WATER - MICROBIOLOGY, DRINKING WATER - PRIMARY INORGANIC CONTAMINANTS, DRINKING WATER - SECONDARY INORGANIC CONTAMINANTS, NON-POTABLE WATER - EXTRACTABLE ORGANICS, NON-POTABLE WATER - GENERAL CHEMISTRY, NON-POTABLE WATER - METALS, NON-POTABLE WATER - MICROBIOLOGY, NON-POTABLE WATER - PESTICIDES-HERBICIDES-PCB'S, NON-POTABLE WATER - VOLATILE ORGANICS, SOLID AND CHEMICAL MATERIALS - EXTRACTABLE ORGANICS, SOLID AND CHEMICAL MATERIALS - GENERAL CHEMISTRY, SOLID AND CHEMICAL MATERIALS - METALS, SOLID AND CHEMICAL MATERIALS - PESTICIDES-HERBICIDES-PCB'S, SOLID AND CHEMICAL MATERIALS - VOLATILE ORGANICS

Continued certification is contingent upon successful on-going compliance with the NELAC Standards and FAC Rule 64E-1 regulations. Specific methods and analytes certified are cited on the Laboratory Scope of Accreditation for this laboratory and are on file at the Bureau of Public Health Laboratories, P. O. Box 210, Jacksonville, Florida 32231. Clients and customers are urged to verify with this agency the laboratory's certification status in Florida for particular methods and analytes.

Date Issued: February 14, 2014 Expiration Date: June 30, 2014



William H. Anderson, DHA, FACHE, Director
Division of Emergency Preparedness and Community Support
DH Form 1697, 7/04

NON-TRANSFERABLE E87582-22-02/14/2014
Supersedes all previously issued certificates



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

February 21, 2014

Denny Dobbs
Peachtree Environmental
3000 Northwoods Pkwy
Norcross GA 30071

TEL: (770) 449-6100
FAX: (770) 449-6119

RE: 1 Superior Blvd.

Dear Denny Dobbs:

Order No: 1402B65

Analytical Environmental Services, Inc. received 10 samples on 2/15/2014 10:00:00 AM for the analyses presented in 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.

AES' certifications are as follows:

- NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/13-06/30/14.
- AIHA-LAP, LLC Laboratory ID: 100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/15.

These results relate only to the items tested. This report may only be reproduced in full.

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

Dorothy deBruvn
Project Manager



ANALYTICAL ENVIRONMENTAL SERVICES, INC
3080 Presidential Drive, Atlanta GA 30340-3704
TEL: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

CHAIN OF CUSTODY

Work Order: 1402365

Date: 2/15/14 Page 1 of 1

COMPANY: <u>Pondtree Environmental</u>		ADDRESS:		ANALYSIS REQUESTED										Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.		No # of Containers	
PHONE: <u>404-281-5730</u>		FAX:		PRESERVATION (See codes)													
SAMPLED BY: <u>Denny Dobbs</u>		SIGNATURE: <u>[Signature]</u>												REMARKS			
#	SAMPLE ID	DATE	TIME	Grab	Composite	Matrix (See codes)											
1	GW-1	2/14	12:50	X	GW	GW											3
2	GW-2	2/14	1:00		GW	GW											3
3	GW-3	2/14	2:10		GW	GW											3
4	SB-1 0-2'	2/14	12:40		S	S											1
5	SB-1 5-7'		12:45		S	S											3
6	SB-2 8-10'		11:45		S	S											4
7	SB-3 8-10'		12:00		S	S											4
8	SB-4 0-2'		12:25		S	S											1
9	SB-4 5-7'		12:35		S	S											3
10																	
11																	
12																	
13																	
14																	
RELINQUISHED BY		DATE/TIME	RECEIVED BY		DATE/TIME	PROJECT INFORMATION										RECEIPT	
1: <u>[Signature]</u>		2/15/14 10:00a	1: <u>Latoya R</u>		2/15/14 10:00a	PROJECT NAME: <u>1 Superior Blvd</u>										Total # of Containers	
2: <u>[Signature]</u>			2: <u>[Signature]</u>			PROJECT #										Turnaround Time Request: <input checked="" type="radio"/> Standard 5 Business Days <input type="radio"/> 2 Business Day Rush <input type="radio"/> Next Business Day Rush <input type="radio"/> Same Day Rush (auth req.) <input type="radio"/> Other	
3: <u>[Signature]</u>			3: <u>[Signature]</u>			SITE ADDRESS: <u>Rome Ga.</u>											
						SEND REPORT TO: <u>Denny Dobbs</u>											
SPECIAL INSTRUCTIONS/COMMENTS:				SHIPMENT METHOD		INVOICE TO: <u>Pondtree</u>										STATE PROGRAM (if any):	
				OUT IN		QUOTE #:										E-mail? Y/N; Fax? Y/N	
				CLIENT FedEx UPS MAIL COURIER		PO#:										DATA PACKAGE: I II III IV	
				GREYHOUND OTHER													

SAMPLES RECEIVED AFTER 3PM OR ON SATURDAY ARE CONSIDERED RECEIVED THE NEXT BUSINESS DAY. IF TURNAROUND TIME IS NOT INDICATED, AES WILL PROCEED WITH STANDARD TAT OF SAMPLES.
SAMPLES ARE DISPOSED 30 DAYS AFTER REPORT COMPLETION 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) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original; Yellow Copy - Client

Client: Peachtree Environmental
Project: 1 Superior Blvd.
Lab ID: 1402B65

Case Narrative

Sample Receiving Nonconformance:

A Trip Blank was provided but not listed on the Chain of Custody. Trip blank analyzed at no cost to the client.

Volatiles Organic Compounds Analysis by Method 8260B:

Percent recoveries for the internal standard compounds Pentafluorobenzene and 1,4-Dichlorobenzene-d4 on sample 1402B65-007A were outside control limits biased low due to suspected matrix interference. All other internal standard recoveries were within control limits.

Analytical Environmental Services, Inc

Date: 21-Feb-14

Client: Peachtree Environmental

Project Name: 1 Superior Blvd.

Lab ID: 1402B65-001

Client Sample ID: GW-1

Collection Date: 2/14/2014 12:50:00 PM

Matrix: Groundwater

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
TCL VOLATILE ORGANICS SW8260B				(SW5030B)				
1,1,1-Trichloroethane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,1,2,2-Tetrachloroethane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,1,2-Trichloroethane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,1-Dichloroethane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,1-Dichloroethene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,2,4-Trichlorobenzene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,2-Dibromo-3-chloropropane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,2-Dibromoethane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,2-Dichlorobenzene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,2-Dichloroethane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,2-Dichloropropane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,3-Dichlorobenzene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
1,4-Dichlorobenzene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
2-Butanone	BRL	50		ug/L	187123	1	02/17/2014 16:19	AK
2-Hexanone	BRL	10		ug/L	187123	1	02/17/2014 16:19	AK
4-Methyl-2-pentanone	BRL	10		ug/L	187123	1	02/17/2014 16:19	AK
Acetone	BRL	50		ug/L	187123	1	02/17/2014 16:19	AK
Benzene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Bromodichloromethane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Bromoform	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Bromomethane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Carbon disulfide	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Carbon tetrachloride	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Chlorobenzene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Chloroethane	BRL	10		ug/L	187123	1	02/17/2014 16:19	AK
Chloroform	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Chloromethane	BRL	10		ug/L	187123	1	02/17/2014 16:19	AK
cis-1,2-Dichloroethene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
cis-1,3-Dichloropropene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Cyclohexane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Dibromochloromethane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Dichlorodifluoromethane	BRL	10		ug/L	187123	1	02/17/2014 16:19	AK
Ethylbenzene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Freon-113	BRL	10		ug/L	187123	1	02/17/2014 16:19	AK
Isopropylbenzene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
m,p-Xylene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Methyl acetate	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Methyl tert-butyl ether	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Methylcyclohexane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Methylene chloride	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
o-Xylene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

E Estimated (value above quantitation range)

S Spike Recovery outside limits due to matrix

Narr See case narrative

NC Not confirmed

< Less than Result value

J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc

Date: 21-Feb-14

Client: Peachtree Environmental
 Project Name: 1 Superior Blvd.
 Lab ID: 1402B65-001

Client Sample ID: GW-1
 Collection Date: 2/14/2014 12:50:00 PM
 Matrix: Groundwater

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
TCL VOLATILE ORGANICS SW8260B				(SW5030B)				
Styrene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Tetrachloroethene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Toluene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
trans-1,2-Dichloroethene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
trans-1,3-Dichloropropene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Trichloroethene	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Trichlorofluoromethane	BRL	5.0		ug/L	187123	1	02/17/2014 16:19	AK
Vinyl chloride	BRL	2.0		ug/L	187123	1	02/17/2014 16:19	AK
Surr: 4-Bromofluorobenzene	90.7	66.2-120		%REC	187123	1	02/17/2014 16:19	AK
Surr: Dibromofluoromethane	112	79.5-121		%REC	187123	1	02/17/2014 16:19	AK
Surr: Toluene-d8	103	77-117		%REC	187123	1	02/17/2014 16:19	AK
Mercury, Total SW7470A				(SW7470A)				
Mercury	BRL	0.00020		mg/L	187094	1	02/17/2014 13:27	CG
METALS, TOTAL SW6010C				(SW3010A)				
Arsenic	BRL	0.0500		mg/L	187148	1	02/18/2014 23:03	JL
Barium	0.191	0.0200		mg/L	187148	1	02/18/2014 23:03	JL
Cadmium	BRL	0.0050		mg/L	187148	1	02/18/2014 23:03	JL
Chromium	0.0292	0.0100		mg/L	187148	1	02/18/2014 23:03	JL
Lead	0.0704	0.0100		mg/L	187148	1	02/18/2014 23:03	JL
Selenium	BRL	0.0200		mg/L	187148	1	02/18/2014 23:03	JL
Silver	BRL	0.0100		mg/L	187148	1	02/18/2014 23:03	JL

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc

Date: 21-Feb-14

Client: Peachtree Environmental
Project Name: 1 Superior Blvd.
Lab ID: 1402B65-002

Client Sample ID: GW-2
Collection Date: 2/14/2014 1:00:00 PM
Matrix: Groundwater

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
TCL VOLATILE ORGANICS SW8260B				(SW5030B)				
1,1,1-Trichloroethane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,1,2,2-Tetrachloroethane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,1,2-Trichloroethane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,1-Dichloroethane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,1-Dichloroethene	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,2,4-Trichlorobenzene	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,2-Dibromo-3-chloropropane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,2-Dibromoethane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,2-Dichlorobenzene	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,2-Dichloroethane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,2-Dichloropropane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,3-Dichlorobenzene	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
1,4-Dichlorobenzene	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
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2-Hexanone	BRL	10		ug/L	187123	1	02/17/2014 17:45	AK
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Bromomethane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Carbon disulfide	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Carbon tetrachloride	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Chlorobenzene	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Chloroethane	BRL	10		ug/L	187123	1	02/17/2014 17:45	AK
Chloroform	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Chloromethane	BRL	10		ug/L	187123	1	02/17/2014 17:45	AK
cis-1,2-Dichloroethene	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
cis-1,3-Dichloropropene	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Cyclohexane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Dibromochloromethane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
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Ethylbenzene	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Freon-113	BRL	10		ug/L	187123	1	02/17/2014 17:45	AK
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m,p-Xylene	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Methyl acetate	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Methyl tert-butyl ether	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Methylcyclohexane	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
Methylene chloride	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK
o-Xylene	BRL	5.0		ug/L	187123	1	02/17/2014 17:45	AK

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
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- > Greater than Result value

E Estimated (value above quantitation range)

S Spike Recovery outside limits due to matrix

Narr See case narrative

NC Not confirmed

< Less than Result value

J Estimated value detected below Reporting Limit



RECEIVED
Georgia EPD

APR 10 2014

April 3, 2014

Response and Remediation Program

Georgia Environmental Protection Division (GAEPD)
Hazardous Sites Response Program
Attn: Release Notification
Floyd Towers East, Suite #1462
2 Martin Luther King Jr. Drive SE
Atlanta, Georgia 30334-9000

COPY

RE: Foundry Park Inn & Spa
295 East Dougherty Street
Athens, Clarke County, Georgia
Blackstone Project Number: AJCPIL001.04

To whom it may concern:

On behalf of the property owner (Graduate Athens Owner LLC), Blackstone Consulting LLC (Blackstone) is submitting the attached Release Notification Package for the above-referenced property.

Based on the information within the attached Release Notification Package and our application of the Reportable Quantities Screening Method (RQSM) for the regulated substances identified at the site, the facility does not exceed the threshold score for the applicable pathway. Accordingly, it appears that the site should not be listed on the Hazardous Site Inventory.

If you have any questions regarding the attached information, please do not hesitate to contact either of us.

Sincerely,

BLACKSTONE CONSULTING LLC

A handwritten signature in black ink, appearing to read 'T. Arguden'.

Tevfik Arguden, Ph.D, CPG
Senior Associate

A handwritten signature in black ink, appearing to read 'Stephen E. Manelis'.

Stephen E. Manelis
Principal

Enclosure: Release Notification Package

6194

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
Hazardous Sites Response Program
Suite 1462, Floyd Tower East
2 Martin Luther King Jr. Drive, SE
Atlanta, Georgia 30334-9000

RECEIVED
Georgia EPD

APR 10 2014

1. The information provided in this form is for:

- ☒ Initial Release Notification
☐ Supplemental Notification

Response and Remediation Program

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)					
3	Tax Map and Parcel ID Number:	163D3 L002	Acreage	3.8		
4	Site or Facility Name	Foundry Park Inn & Spa				
5	Site Street Address	295 East Dougherty Street				
6	Site City	Athens	County	Athens	Zip	30601
7	Property Owner	Graduate Athens Owner LLC				
8	Property Owner Mailing Address	621 W. Randolph, Suite 4				
9	Property Owner City	Chicago	State	IL	Zip	60661
10	Property Owner Telephone No.	Mr. Christian Strobel 312-275-1058				
11	Site Contact Person	Dede Farmer	Title	Director of Operations		
12	Site Contact Company Name	Foundry Park Inn & Spa				
13	Site Contact Mailing Address	295 East Dougherty Street				
14	Site Contact City	Athens	State	GA	Zip	30601
15	Site Contact Telephone No.	706-443-1857				
16	Facility Operator Contact Person	See Lines 11-15 Above	Title			
17	Facility Operator Company Name					
18	Facility Operator Mailing Address					
19	Facility Operator City		State		Zip	
20	Facility Operator Telephone No.					

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By: Graduate Athens Owner LLC
NAME (Please type or print)
[Signature]
SIGNATURE

Officer
TITLE
4/3/2014
DATE

PART II -- RELEASE INFORMATION

Page 2 of 5

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

- 1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:**

The source of the suspected release is unknown.

- 2. Release dates(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):**

The physical state, type, amount and date of the suspect release is unknown. The suspect release was identified in the southwestern portion of the site, which is upgradient of and in areas unassociated with the former foundry operations. This portion of the site was developed with single family residences and public streets between at least 1898 and circa 1967, when the buildings and local streets were razed. The present day hotel buildings were constructed in this portion of the site in 1974.

- 3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).**

Blackstone performed a limited site investigation at the site as part of a routine transaction-related due diligence. Blackstone installed five (5) soil borings to a maximum depth of 20 feet below the surface and converted three of the borings to groundwater monitoring wells. Soil and groundwater samples were analyzed for volatile organic compounds, semi-volatile organic compounds, polychlorinated biphenyls, total petroleum hydrocarbons and metals. Please see the attached Site Summary and Analytical Data Summary tables (Table 1 and Table 2) for more detailed discussion and the Soil Boring and Monitoring Well Location Map for the sample locations discussed.

- 4. Access to the area affected by the release. Check the appropriate box:**

- ☒ Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
☐ Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
☐ Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

Foundry Park Inn & Spa is a private property and is surrounded by fences and has a full-time security.

- 5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.**

- ☐ A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
☐ An engineered and maintained earthen material or compacted fill or a high density synthetic material
☐ Loose earthen fill or native soil
☐ No cover
☒ Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

No soil contamination was identified during the investigation. The site is covered by buildings and paved surfaces. No reportable conditions were identified in the soil samples retrieved from the areas of concern during this investigation. Please see the attached Site Summary and Table 1 for detected compounds in soils.

PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

☒ Less than 300 feet
☐ 301 to 1000 feet

☐ 1001 to 3000 feet
☐ 3001 to 5280 feet

☐ Greater than 1 mile

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: Lay Park Community and Recreation Center and associated ball fields and wooded areas

Address: 297 Hoyt Street, Athens GA

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

☐ Less than 0.5 miles
☐ 0.5 to 1 mile

☐ 1 to 2 miles
☐ 2 to 3 miles

☒ Greater than 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: No drinking water well was identified within 3-mile radius of the site

Address: _____

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

☐ Yes

☒ No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

Page ____ of ____

[illegible]

PART IV -- GROUNDWATER RELEASE INFORMATION

Page ____ of ____

Please provide the following information for EACH regulated substance released to the groundwater at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

Regulated Substance	CAS Registry Number	Highest Detected Concentration (Specify Units)	Sample Depth Below Ground Surface (Feet)
Tetrachloroethylene	127-18-4	4.3 ug/L	20 - 10 ft screen
cis-1,2 Dichloroethene	156-59-2	3.1 ug/L	20 - 10 ft screen
Trichloroethene	79-01-6	3.6 ug/L	20 - 10 ft screen

Site Summary Page
Foundry Park Inn & Spa
295 East Dougherty Street
Athens, Clarke County, Georgia 30601

The approximately 3.8-acre site is located at 295 East Dougherty Street in Athens, Clarke County, Georgia. The site is situated approximately 700 feet North American Vertical Datum (NAVD), 1929. The topography of the site and surrounding area slopes relatively steeply from the south (approximately 710 feet NAVD) toward the north-northeast (694 feet NAVD).

The site is within an urban area characterized by mixed residential and commercial development. The site is bordered by Lay Park Community and Recreation Center (297 Hoyt Street) and associated ball fields and wooded areas to the north; North Avenue and lightly wooded areas to the east; East Dougherty Street and the Athens Welcome Center to the south and the Athens Fire Department and Hotel Indigo to the west.

The northeastern portion of the site was first developed with a foundry and machine shop by at least 1893, which operated until approximately 1972. The former foundry buildings were renovated into the present-day meeting facility and restaurant building in 2000. The northeastern portion of the site was also occupied by a lumberyard containing a rail spur and various lumber storage buildings between at least 1893 and circa 1918 and the Athens Mattress Company from approximately 1908 until 1950. The southwestern portion of the site was developed with single family residences and public streets between at least 1898 and circa 1967, when the buildings and local streets were razed. The present day hotel buildings were constructed on the southwestern portion of the site in 1974.

In February and March 2014, as part of routine transaction-related due diligence, Blackstone installed five soil borings at the site, three of which were completed as groundwater monitoring wells. Soil samples collected from the borings were field screened and logged. At each boring, a shallow soil sample was retrieved from the upper 4 feet of the boring and a deeper soil sample was retrieved from immediately above the saturated soils. The samples were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH Gasoline and diesel range GRO/DRO), polychlorinated biphenyls (PCBs) and RCRA metals. Although trace concentrations of DRO, PCB-1260, and several metals were detected, no reportable conditions were identified in the soil samples retrieved during this investigation. The analytical results are summarized in Table 1.

Perched groundwater was identified in saprolite from 8 to 16 feet below the surface. The wells were very unproductive and highly turbid. Trace concentrations of TPH, toluene, trichloroethene (TCE) and cis-1,2-dichloroethene (cis-1,2-DCE) were detected at concentrations less than their respective MCLs. Total lead, barium and chromium were detected at concentrations greater than their respective MCLs. Tetrachloroethene (PCE) was detected in the groundwater samples retrieved from the background up-gradient well at 15 microgram per liter. These detections were likely associated with the high turbidity of the samples. The wells were redeveloped in March 2014 and allowed to stabilize prior to resampling for dissolved metals and PCE. Resampling of the wells yielded no detectable dissolved metals or PCE in groundwater. The analytical results are summarized in Table 2.

WATER WELL AND RECEPTOR SURVEY

To determine the proximity of the site to water well receptors, Blackstone contacted Athens-Clarke County Environmental Health Department, Athens-Clarke County Public Utilities and the Georgia Department of Natural Resources for a list of drinking water wells in Athens, Georgia.

Blackstone understands that there are no public drinking water wells on the site or within 3 miles of the site. According to the agency, Athens's drinking water comes from surface reservoirs. The Department of Natural Resources database revealed three private wells within approximately 2.7 miles to the east of the site (GA0590004 Hallmark Mobile Home Estates). However, no information was provided regarding the depths and yields of these wells and whether these wells were still active or abandoned. These wells are east of the Oconee River, which serves as a hydraulic boundary and are approximately 80 feet topographically higher than the site.

Additionally, a survey from accessible streets conducted by Blackstone personnel did not identify visual evidence of drinking water wells on adjoining properties or other properties within a one half-mile radius of the site.

Furthermore, Clarke County is located in area characterized by "Low Groundwater Pollution Susceptibility." According to the Georgia's Groundwater Recharge Areas map, there are no productive aquifer or recharge areas in Clarke County.

According to the Georgia's Rule for Environmental Planning Criteria, Section 391316, sensitive environments consist of the following:

- Wetlands as defined by protocols described in the Corps of Engineers Wetlands Delineation Manual (1987 Manual)
- Coastal Marshlands as defined by the Coastal Marshlands Protection Act
- Sensitive environmental areas such as national or state parks, historic sites and wildlife preserves.

Based on the sources researched (listed below) there are no sensitive environments on and immediately adjacent to the site.

Sources Researched:

1. USGS - <http://earthexplorer.usgs.gov>
2. GA Geological Survey Groundwater Recharge Area Map
3. Georgia Department of Community Affairs Groundwater Susceptibility Map
4. GA DNR - vicki.trent@dnr.state.ga.us (404.651.8482)
5. GA DNR - Watershed Protection Branch (ggs.store@dnr.state.ga.us)

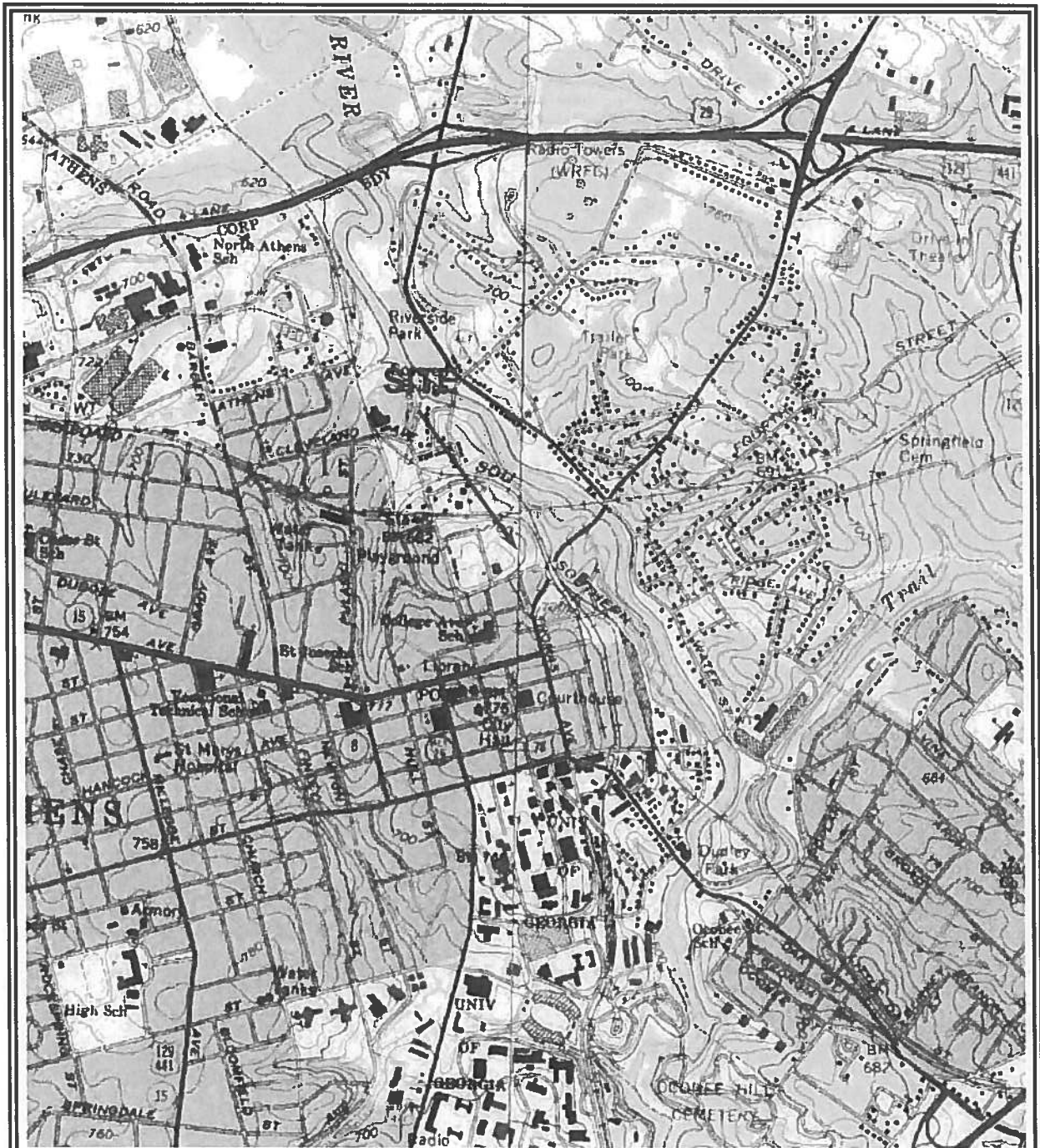
-
6. Clarke County Environmental Health Department
http://publichealthathens.com/clarke_county.htm
 7. Athens-Clarke County Public Utilities (<http://www.athensclarkecounty.com/214/Public-Utilities>)
 8. GA - EPD - www.georgiaepd.org
 9. GA GIS Mapping - <http://publicrecords.onlinesearches.com/Georgia-GIS-and-Mapping.htm>
 10. University of Georgia - <http://www.libs.uga.edu/athens/environment.html>
 11. GA Map Atlas - <http://www.georgiaplanning.com/documents/atlas/mapsindex.htm>
 12. Athens Clarke County Conservation Easement Map (Map 4-6).
 13. Athens Clarke County Environmental Areas Map
 14. Athens Clarke County – Your Drinking Water From Source to Tap. J.G. Beacham Water Treatment Plant Publication.
 15. Higgins, MW, and RL Atkins, 1981, The Stratigraphy of the Piedmont Southeast of the Brevard Zone in the Atlanta, Georgia, Area, in Wigley, PB, ed., Latest Thinking on the Stratigraphy of Selected Areas in Georgia; Georgia Geologic Survey Information Circular 54
 16. Higgins, MW; RL Atkins; TJ Crawford, RF Crawford, R Brooks, and RB Cook, 1988, The Structure, Stratigraphy, Tectonostratigraphy, and Evolution of the Southernmost Part of the Appalachian Orogen; USGS Geological Survey Professional Paper 1475

Foundry Park Inn & Spa
295 E. Dougherty Street, Athens, GA
Athens, Georgia

TABLE 1

Reportable Quantities Screening Method
Groundwater Pathway

REPORTABLE QUANTITIES SCREENING METHOD	SPECIFIC COMPOUND			
	1	2	3	3
ANALYTE INFORMATION				
Analyte	Tetrachloroethene	Barium	Chromium	Lead
Highest Concentration Detected (ug/L)	<MCL (MW-1)	<MCL (MW-6)	<MCL (MW-6)	<MCL (MW-6)
RQSM CALCULATION				
A. Has a release to ground water occurred? Known (45), Suspected (10), Potential Future (5) If A = 45, then go to D.	10	10	10	10
B. Route Characteristics				
1b. Susceptibility Rating Higher (6), Average (3), Lower (0)	0	0	0	0
2b. Physical State Stable Solid (0), Unstable Solid (1), Powder/Ash (2), Liquid/Gas/Sludge (3)	3	3	3	3
C. Containment Very Good (0), Good (1), Fair (2), Poor (3)	1	1	1	1
D. Release Characteristics				
1d. Regulated Substance	Tetrachloroethene	Barium	Chromium	Lead
2d. Toxicity (if unknown then 4): None (0) Low (1) (2) (4) (8) (16) High	0	0	0	0
3d. Quantity (if unknown then 4): Threshold (1) (2) (3) (4) (5) (6) (7) (8) Very Large	4	4	4	4
E. Targets (does release exceed MCL - see right)	no	no	no MCL	no
1e. Exposure to ground water release Known release >= MCL, and known human exposure (25) Known release >= MCL, and suspected human exposure (20) Known release, no MCL exists, and known human exposure (18) Known release >= MCL, and known human exposure (15) Known release, no MCL exists, and suspected human exposure (12) Suspected release and human exposure suspected (8) Known release >= MCL, but no human exposure suspected (4) Known release, no MCL exists, and no human exposure (3) Suspected release but no human exposure suspected (2) Potential future release (1) Known release less than MCL (0)	4	4	4	4
2e. Distance to well or spring (miles) <1/2 (16) 1/2 to 1 (9) 1 to 2 (4) 2 to 3 (1) >3 (0) If 1e includes known or suspected human exposure, then 2e = 16 If 1e = 0 then 2e = 1	9	9	9	9
Ground Water Pathway Score Calculation	1.53	1.53	1.53	1.53
Sgw = M x (2d+3d) x (1e+2E) / 442.8 where: M = A + ((1b+2b) x C) Threshold - 10				



Foundry Park Inn & Spa
Athens, Clarke County, Georgia

Project No. AJCPIL001.1

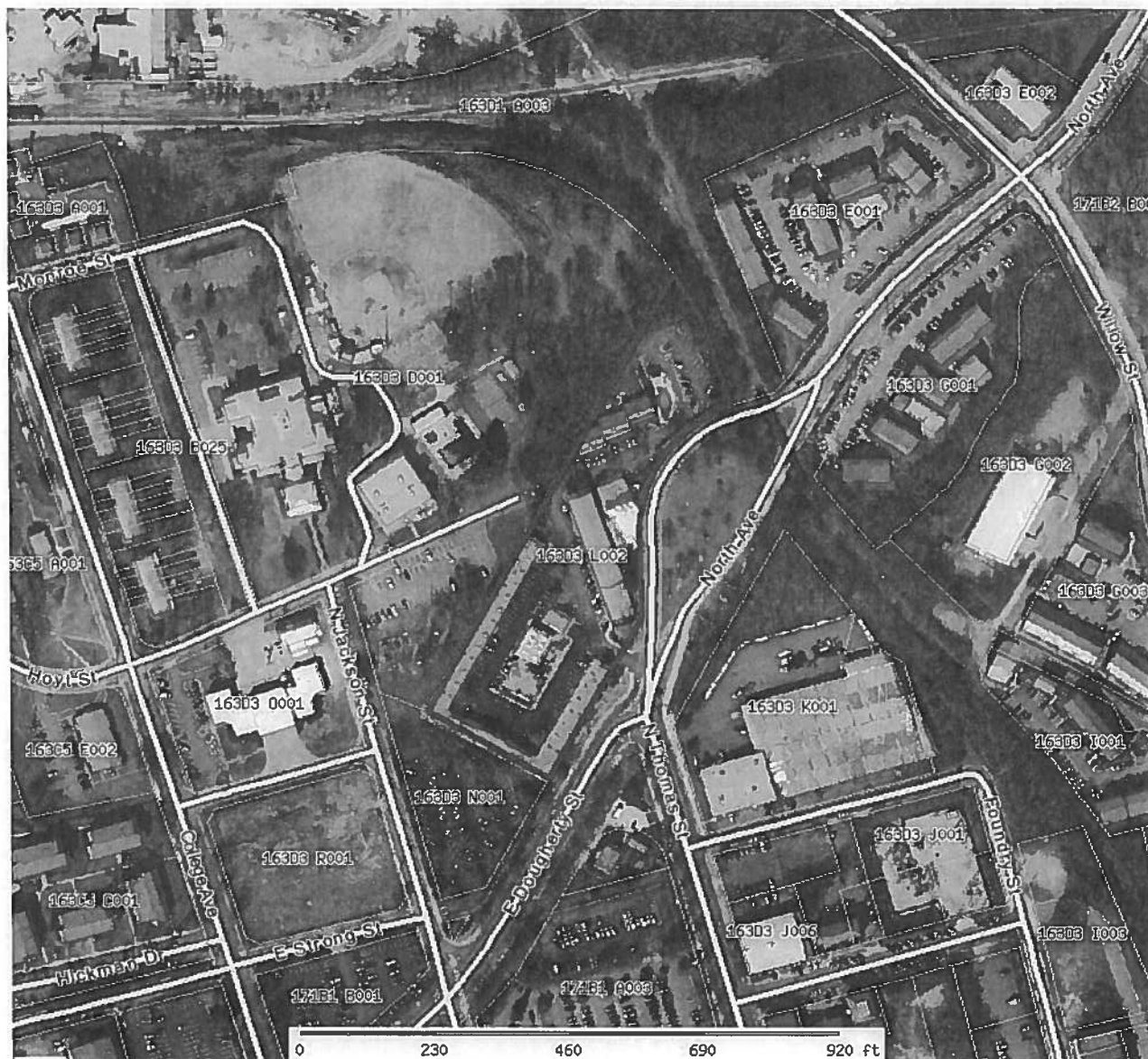
Site Location Map

(Athens East, GA, Topographic Map, 1986)



miles 0 0.5 1.0

BLACKSTONE
CONSULTING LLC



Clarke County Assessor

Parcel: 163D3 L002 Acres: 3.8

Name:	FOUNDRY PARK INN LLC	Land Value	\$3,567,208.00
Site:	295 E DOUGHERTY ST	Building Value	\$2,277,713.00
Sale:	\$0 on 03-2010 Reason=B Qual=U	Misc Value	\$30,079.00
	295 E DOUGHERTY ST	Total Value:	\$5,875,000.00
Mail:	ATHENS, GA 30601		



The Clarke County Assessor's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified taxroll. All data is subject to change before the next certified taxroll. PLEASE NOTE THAT THE PROPERTY APPRAISER MAPS ARE FOR ASSESSMENT PURPOSES ONLY NEITHER CLARKE COUNTY NOR ITS EMPLOYEES ARE RESPONSIBLE FOR ERRORS OR OMISSIONS —THIS IS NOT A SURVEY—
Date printed: 06/25/13 : 13:49:52



FIGURE NO.:

SITE PLAN

FOUNDRY PARK INN
295 E. DOUGHERTY STREET
ATHENS, GEORGIA

AJCPIL001.03

LEGEND

--- SITE BOUNDARY

● SOIL BORING

⊙ MONITORING WELL/
SOIL BORING



Scale: (in Feet)
0 70 140

BLACKSTONE
CONSULTING LLC

FEBRUARY 25, 2014

TABLE 1
Summary of Laboratory Analytical Results
Soil Samples
March 2014
Foundry Park Inn & Spa
295 E. Dougherty Street, Athens, GA
AJCPIL001.03

Location	Depth	VOCs (µg/kg)	SVOCs (µg/kg)	TPH (mg/kg)		PCBs (µg/kg)			Metals (mg/kg)							
				GRO	DRO	PCB- 1260	Other PCBs	Total PCBs	As	Ba	Cd	Cr	Hg	Ag	Pb	Se
B-1	Shallow	All BDL	All BDL	BDL	110	BDL	All BDL	--	3.0	140	BDL	44	0.065	BDL	23	0.64
	Deep	All BDL	--	BDL	BDL	BDL	All BDL	--	0.80	130	BDL	31	BDL	BDL	9.1	BDL
B-2	Shallow	All BDL	--	BDL	--	1200	All BDL	1200	--	--	--	--	--	--	--	--
	Deep	All BDL	All BDL	--	BDL	--	--	--	3.5	150	0.097	33	0.052	BDL	15	BDL
B-3	Shallow	All BDL	--	BDL	BDL	BDL	All BDL	--								
B-4	Shallow	All BDL	--	--	BDL	--	--	--	0.82	68	BDL	24	BDL	BDL	35	BDL
	Deep	All BDL	All BDL	BDL	--	BDL	All BDL	--	1.8	200	BDL	20	BDL	BDL	6.3	BDL
B-6	Shallow	All BDL	--	BDL	--	BDL	All BDL	--	--	--	--	--	--	--	--	--
	Deep	All BDL	All BDL	--	BDL	--	--	--	0.87	94	BDL	16	BDL	BDL	11	BDL
GA-EPD NC		--	--	--	--	--	--	1,550	41	500	39	1200	17	10	400	

Notes and definitions:

bold values denotes detected laboratory concentrations

-- not applicable or not analyzed

µg/kg - micrograms per kilogram

BDL - below laboratory detection level

DRO - diesel-range (medium) organics

GA-EPD - Georgia Environmental Protection Division

GRO - gasoline-range (light) organics

mg/kg - milligrams per kilogram

NC - notification requirement

PCBs- polychlorinated biphenyls

SVOCs - semi-volatile organic compounds

TPH - total petroleum hydrocarbons

VOCs - volatile organic compounds

TABLE 2
Summary of Laboratory Analytical Results
Groundwater Samples
February and March 2014
Foundry Park Inn & Spa
295 E. Dougherty Street, Athens, GA
AJCPIL001.03

Well	Date Collected	VOCs (µg/L)					SVOCs (µg/L)	TPH (mg/L)		PCBs (µg/L)	Metals (µg/L)							
		PCE	cis-1,2-DCE	TCE	Toluene	Other VOCs		GRO	DRO		As	Ba	Cd	Cr	Hg	Ag	Pb	Se
MW-1	2/20/2014	15	3.1	3.6	12	All BDL	All BDL	0.061	0.24	All BDL	5.6	480	BDL	76	BDL	BDL	68	BDL
	3/10/2014	BDL	--	--	--	--	--	--	--	--	--	--	--	--	--	--	BDL	--
MW-2	2/20/2014	BDL	BDL	BDL	BDL	All BDL	All BDL	BDL	0.16	All BDL	BDL	170	BDL	13	BDL	BDL	49	BDL
	3/10/2014	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	BDL	--
MW-6	2/20/2014	4.3	BDL	BDL	BDL	All BDL	All BDL	BDL	0.44	All BDL	28	3700	1.0	200	BDL	BDL	400	5.1
	3/10/2014	--	--	--	--	--	--	--	--	--	--	17	--	BDL	--	--	BDL	--
GEPD GWC		5	70	5	1000	--	--	--	--	--	10	2000	5	100	2	100	15	50
US EPA MCLs		5	70	5	1000	--	--	--	--	--	10	2000	5	100	2	100*	15	50

Notes and definitions:

bold values denotes detected laboratory concentrations

-- - not applicable or not analyzed

* Secondary standard, not a primary MCL

µg/L - micrograms per liter, parts per billion

BDL - below laboratory detection level

DCE - dichloroethene

DRO - diesel-range organics

GRO - gasoline range organics

GWC - groundwater criteria

MCL - Maximum Contaminant Level

mg/L - milligrams per liter (parts per million, ppm)

PCBs - polychlorinated biphenyls

PCE - tetrachloroethene, perchloroethene

SVOCs - semi-volatile organic compounds

TCE - trichloroethene

US EPA - United States Environmental Protection Agency

VOCs - volatile organic compounds



RECEIVED
Georgia EPD

APR 14 2014

April 9, 2014
20143991.001A|JAX14R0146

Response and Remediation Program

Georgia Environmental Protection Division
Response & Remediation Program
Suite 1054, 10th Floor, Floyd Tower East
2 Martin Luther King Jr. Drive, SE
Atlanta, Georgia 30334-9000
Attention: Mr. David Brownlee

RE: Hazardous Site Response (HSR) Initial Release Notification
The Cloister at Sea Island
Sea Island, Glynn County, Georgia

Dear Mr. Brownlee:

Kleinfelder, Inc. (Kleinfelder) is pleased to provide the attached HSR Initial Release Notification package on behalf of the property owner, Sea Island Acquisitions, LLC (Sea Island), for the above-referenced site located at 100 Cloister Drive on Sea Island, in Glynn County, Georgia, herein referred to as the Site.

The polycyclic aromatic hydrocarbon (PAH) acenaphthene was identified above the laboratory method detection limit (MDL) in one (1) groundwater sample collected at the Site during a Phase II Environmental Site Assessment (ESA) conducted by another consultant in March 2014 as part of a business transaction involving the Site. Acenaphthene was not identified above the laboratory MDL in any other groundwater or soil samples, including samples taken in the same vicinity, collected during the Phase II ESA. Based on the information provided by the consultant that performed the Phase II ESA, as well as the information provided by the property owner after a reasonable inquiry, it is unclear whether the source of the acenaphthene was a former UST containing petroleum products or a former laundry facility. Although the release would not require notification if it resulted from a release of petroleum products, the property owner has directed that this release notification be filed, out of an abundance of caution.

For your convenience, Kleinfelder determined that the Ground Water Pathway score for acenaphthene would be 11.6 using the Reportable Quantities Screening Method (RQSM) as part of the preparation of the attached HSR Release Notification package. Although the Ground Water Pathway Score is slightly above the threshold of 10, the concentration of acenaphthene identified in the groundwater sample collected from the Site is well below its applicable Type 1 Risk Reduction Standard (RRS), and the closest drinking water well is located in an up-gradient position from the Phase II ESA groundwater sample location. Based on this information, Kleinfelder respectfully recommends that the Site not be listed on the Hazardous Site Inventory (HSI).

Should any additional information regarding the Site be needed, please contact me at (904) 534-9171. Thank you for your prompt attention in this matter.

Sincerely,

Kleinfelder, Inc.

A handwritten signature in dark ink, appearing to read "Brett H. Miller", is written over the printed name.

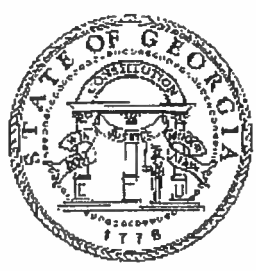
Brett H. Miller, P.G. (No. PG001988)
Project Manager

Attachments

Cc: Mr. Jim Gilbert, General Counsel, Sea Island Acquisitions, LLC

6195

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
Hazardous Sites Response Program
Suite 1462, Floyd Tower East
2 Martin Luther King Jr. Drive, SE
Atlanta, Georgia 30334-9000

RECEIVED
Georgia EPD

APR 14 2014

1. The information provided in this form is for:
☒ Initial Release Notification
☐ Supplemental Notification

PART I -- PROPERTY INFORMATION Response and Remediation Program

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	N/A			
3	Tax Map and Parcel ID Number:	05-00462	Acreage	24.09	
4	Site or Facility Name	The Cloister at Sea Island			
5	Site Street Address	100 Cloister Drive			
6	Site City	Sea Island	County	Glynn	Zip 31561
7	Property Owner	Sea Island Acquisitions, LLC			
8	Property Owner Mailing Address	PO Box 30351			
9	Property Owner City	Sea Island	State	GA	Zip 31561
10	Property Owner Telephone No.	904-638-3611			
11	Site Contact Person	James B. Gilbert, Esq.	Title	General Counsel	
12	Site Contact Company Name	Sea Island Acquisitions, LLC			
13	Site Contact Mailing Address	PO Box 30351			
14	Site Contact City	Sea Island	State	GA	Zip 31561
15	Site Contact Telephone No.	904-638-3611			
16	Facility Operator Contact Person	SAME AS ABOVE	Title		
17	Facility Operator Company Name				
18	Facility Operator Mailing Address				
19	Facility Operator City		State		Zip
20	Facility Operator Telephone No.				

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME (Please type or print)
James B. Gilbert, Jr.

TITLE
General Counsel

SIGNATURE

DATE 04-09-2014
Revised May 2008

PART II -- RELEASE INFORMATION

Page 2 of 5

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

- 1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:**

Unknown. AMEC Environment & Infrastructure, Inc. (AMEC) performed a Phase I Environmental Site Assessment (ESA) for the Site in February 2014 which identified the presence of a former laundry on the Site, along with three (3) former underground storage tanks (USTs), and a former filling station in the vicinity of the former laundry. All of the former on-site USTs were properly removed from the Site in 1994 and 2003. It was reported that dry cleaning activities may have occurred for at least a short time at the former laundry facility from around the late 1990s to the early 2000s; however, it is unknown if any dry cleaning activities took place prior to the 1980s.

- 2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):**

Unknown

- 3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).**

A Phase II ESA Report, dated March 11, 2014, was completed by AMEC as part of a business transaction that involved the Site that included the results of the analyses of four (4) soil samples and four (4) groundwater samples collected from the vicinity of a former laundry facility and down-gradient of a former filling station and three former USTs. All groundwater samples were installed from properly constructed groundwater monitoring wells. No contaminants of concern were identified in any of the soil samples at concentrations above the laboratory method detection limits (MDLs) and/or the applicable Notifiable Concentrations (NCs). No contaminants of concern were identified in any of the groundwater samples at concentrations above the laboratory MDLs, except for acenaphthene which was identified in one groundwater sample at a concentration well below the applicable Level 1 Risk Reduction Standard.

No other actions have been taken to date regarding this release.

- 4. Access to the area affected by the release. Check the appropriate box:**

- ☒ Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
☐ Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
☐ Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

Access to Sea Island is restricted on a 24-hour basis to employees, guests, and residents. All visitors must check-in at a guard house located on Sea Island Road prior to coming on to Sea Island.

- 5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.**

- ☒ A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
☐ An engineered and maintained earthen material or compacted fill or a high density synthetic material
☐ Loose earthen fill or native soil
☐ No cover
☐ Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

The soil and groundwater samples collected by AMEC during previous Phase II ESA activities are located within an area on the Site that is covered by asphalt.

PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

☒ Less than 300 feet
☐ 301 to 1000 feet

☐ 1001 to 3000 feet
☐ 3001 to 5280 feet

☐ Greater than 1 mile

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: Cloister Cottages (Exclusive Resorts SI1 LLC)

Address: 903 Cottages Lane, Sea Island, Georgia 31561

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

☒ Less than 0.5 miles
☐ 0.5 to 1 mile

☐ 1 to 2 miles
☐ 2 to 3 miles

☐ Greater than 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: Well Site (Sewers and Wells LLC)

Address: 185 Service Road, Sea Island, Georgia 31561

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

☐ Yes

☒ No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

PART III -- SOIL RELEASE INFORMATION

Page 4 of 5

Please provide the following information for EACH regulated substance released to the soil at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

Regulated Substance	CAS Registry Number	Highest Concentration Detected Between 0-6 Inches (Specify Units)	Highest Concentration Detected Between 6-24 Inches (Specify Units)	Highest Concentration Detected Greater Than 24 Inches (Specify Units)
None				

PART IV -- GROUNDWATER RELEASE INFORMATION

Page 5 of 5

Please provide the following information for EACH regulated substance released to the groundwater at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

Regulated Substance	CAS Registry Number	Highest Detected Concentration (Specify Units)	Sample Depth Below Ground Surface (Feet)
Acenaphthene	83327	0.078 mg/L	6-16



SITE SUMMARY

The Site is an approximate 24-acre parcel of land, Parcel 05-00462, referred to as the Cloister at Sea Island, located at 100 Cloister Drive on Sea Island, in Glynn County, Georgia. A Project Location Map of the Site is provided as **Figure 1**. A copy of a 2013 aerial photograph, annotated with the approximate property boundaries based on on-line GIS information obtained from the Glynn County Assessor's Office information, is provided as **Figure 2**.

The Cloister at Sea Island is a luxury resort that consists of a main building, including 200 hotel rooms and suites, situated on the western portion of the Site and a US Post Office, the Cloister Tennis Center, and the Cloister Spa & Fitness Center situated on the eastern portion of the Site. Guest parking and access drives are located along the central and northern portions of the Site. The original Cloister at Sea Island resort was constructed in 1928 and was reconstructed to present-day conditions between 2005 and 2006. Adjoining properties to the Site include luxury multi-family residential development to the north; single-family residences to the east; the Cloister Beach Club & Ocean Villas beyond Sea Island Drive to the south; and the Black Banks River to the west.

The overall topographic gradient of the Site appears to slope to the southwest. Storm water appears to flow to the south/southwest via sheet flow over the Site and through concrete storm water drainage features and through storm water inlets located in the paved areas of the Site. Storm water inlets on site directly connect to the private storm sewer system and storm water is pumped off-site for treatment. Groundwater flow is estimated to be generally toward the southwest and west towards the Black Banks River.

In February 2014, AMEC Environment & Infrastructure, Inc. (AMEC) conducted a Phase I Environmental Site Assessment (ESA) on the Site as part of a business transaction involving the Site. The presence of a former laundry facility was identified on a northern portion of the Site that is now occupied by an asphalt parking area. Dry cleaning activities that may have included the use of the cleaning solvent tetrachloroethene (PCE) reportedly took place in a northwestern portion of the former laundry facility for at least a short period of time between the late 1990s to the early 2000s, which AMEC considered to be recognized environmental condition (REC). It was unknown if dry cleaning activities took place at the on-site laundry facility prior to the 1980s. Additionally, four (4) former diesel fuel underground storage tanks (USTs) were properly removed from the Site in the vicinity of the former laundry facility in 2004. A former filling station was also identified to the east of the former laundry facility. Three (3) USTs containing gasoline or diesel were properly removed from the vicinity of the filling station in 1994. **Figure 3** includes a depiction of the approximate locations of the former laundry facility and filling station. Based on AMEC's Phase I ESA findings, AMEC recommended Phase II ESA activities, including soil and groundwater sampling, in the immediate vicinity of the former laundry facility to identify the presence or absence of contaminants of concerns associated with dry cleaning activities that reportedly took place on the Site in the past.

In February 2014, AMEC installed four (4) Direct Push Technology (DPT) soil borings to a depth of 16-feet below ground surface (bgs) in the vicinity of the former laundry facility. Soil samples were collected from each soil boring at the depth interval that exhibited the highest organic vapor reading during field screening. Following soil sampling activities, each soil boring was converted to a temporary groundwater monitoring well for collection of groundwater samples. A total of four (4) soil samples (GP-1 through GP-4) and four (4) groundwater samples (GP-1 through GP-4) were submitted to a NELAC-certified laboratory for analyses of volatile organic compounds (VOCs) and semi-volatile compounds (SVOCs). Laboratory analyses of the four (4) soil samples yielded no concentrations of contaminants of concern above the laboratory method detection limits (MDLs) and/or the Chapter 391-3-19, O.C.G.A., Appendix I Notifiable Concentrations (NCs). Laboratory analyses of the four (4) groundwater samples yielded no concentrations of contaminants of concern above the laboratory method detection limits (MDLs), except for acenaphthene identified at 0.078 mg/L in groundwater sample GP- 3. Refer to **Figure 3** for a depiction of the soil and groundwater sample locations and **Attachment 1** includes the laboratory analytical report included in AMECs Phase II ESA Report, dated March 11, 2014.

Kleinfelder determined that the Ground Water Pathway score for acenaphthene would be 11.6 using the Reportable Quantities Screening Method (RQSM). Kleinfelder's calculation and scoring justifications are included as **Attachment 2**. Although the Ground Water Pathway score is slightly above the threshold of 10, the concentration of acenaphthene identified in the groundwater sample collected from the Site is well below its Type 1 Risk Reduction Standard (RRS) of 2 mg/L. Additionally, the closest drinking water well is located in an apparent up-gradient position from AMEC's Phase II ESA groundwater sample location. Based on this information, Kleinfelder recommends that the Site not be listed on the Hazardous Site Inventory (HSI).



RECEIVED
Land Protection Branch

APR 16 2014

Hazardous Waste

April 15, 2014

Mr. David Brownlee
Georgia Environmental Protection Division
Hazardous Site Response Program
Suite 1462, Floyd Tower East
2 Martin Luther King Jr. Drive, SE
Atlanta, Georgia 30334-9000

Re: Citgo Food Mart & Retail Suites
1050 Holcombe Road, Decatur (DeKalb County) Georgia
LOGIC Project C270-02

Dear Mr. Brownlee:

In keeping with Georgia Hazardous Site Response Act regulations, please accept this Initial Release Notification for the above-referenced property in Decatur, Georgia. LOGIC is submitting this release notification on behalf of the owner, Golden Tree, Inc. Soil at the property has been impacted by tetrachloroethene and trichloroethene at concentrations exceeding its notification concentration. Groundwater has been impacted by tetrachloroethene and trichloroethene at concentrations exceeding their respective MCLs. The solvents appear to have originated from a former on-site dry cleaners that operated from the property from around 1990 through approximately 2002.

Please let me know if you require any additional information for purposes of your review. Thank you for your time and attention.

Yours faithfully,

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

Jenny Schildecker
Environmental Scientist

Enc.

CC: Chris Fonzi (w/ Attach.)
Mike Tuohy (w/ Attach.)

6147

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
Hazardous Sites Response Program
Suite 1462, Floyd Tower East
2 Martin Luther King Jr. Drive, SE
Atlanta, Georgia 30334-9000

1. The information provided in this form is for:
☒ Initial Release Notification
☐ Supplemental Notification

RECEIVED
Land Protection Branch

APR 16 2014

Hazardous Waste

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)				
3	Tax Map and Parcel ID Number:	15 228 08 004, 15 228 08 005, 15 221 12 007	Acreage	1.57 acres	
4	Site or Facility Name	Citgo Food Mart & Retail Suites			
5	Site Street Address	1050 Holcombe Road			
6	Site City	Decatur	County	Dekalb	Zip 30032
7	Property Owner	Golden Tree, Inc.			
8	Property Owner Mailing Address	1050 Holcombe Road			
9	Property Owner City	Decatur	State	Georgia	Zip 30032
10	Property Owner Telephone No.	404-296-8211			
11	Site Contact Person	Il Sun Kim	Title	President	
12	Site Contact Company Name	Golden Tree, Inc.			
13	Site Contact Mailing Address	1050 Holcombe Road			
14	Site Contact City	Decatur	State	Georgia	Zip 30032
15	Site Contact Telephone No.	404-296-8211			
16	Facility Operator Contact Person	Jong Kyu Kim	Title	Manager	
17	Facility Operator Company Name	Golden Tree, Inc.			
18	Facility Operator Mailing Address	1050 Holcombe Road			
19	Facility Operator City	Decatur	State	Georgia	Zip 30032
20	Facility Operator Telephone No.	404-428-8383			

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Il Sun Kim

President

NAME (Please type or print)

TITLE

SIGNATURE

DATE

PART II -- RELEASE INFORMATION

Page 2 of 5

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

- 1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:**

According to available historic information, a dry cleaners operated from the northernmost suite of the on-site building from around 1990 through approximately 2002. The release appears to have originated from the historical spillage of tetrachloroethene and possibly other chlorinated solvents in the vicinity of the dry cleaners in the north part of the site.

- 2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):**

The release date and quantity are unknown, but the release is presumed to have taken place between approximately 1990 and 2002. The physical state of the released material is presumed to be liquid.

- 3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).**

The investigation during which this contamination was identified is described in the accompanying narrative. No steps have been taken to remediate this release.

- 4. Access to the area affected by the release. Check the appropriate box:**

- ☐ Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
☐ Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
☒ Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

N/A

- 5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.**

- ☒ A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
☐ An engineered and maintained earthen material or compacted fill or a high density synthetic material
☒ Loose earthen fill or native soil
☐ No cover
☐ Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

The contaminated soil sample from SB-1 was covered by a layer of asphalt. The other soil and groundwater samples which were analyzed for VOCs (SB-2, SB-3 and SB-4) were covered by soils.

PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

☒ Less than 300 feet

☐ 301 to 1000 feet

☐ 1001 to 3000 feet

☐ 3001 to 5280 feet

☐ Greater than 1 mile

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: House (Owned by Foreclosure Busters, LLC)

Address: 3803 Travis Trace, Decatur

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

☐ Less than 0.5 miles

☐ 0.5 to 1 mile

☐ 1 to 2 miles

☐ 2 to 3 miles

☒ Greater than 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: No wells identified within three miles

Address: _____

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

☐ Yes

☒ No

If yes, provide details on the potentially affected humans or sensitive environments.

N/A

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you **MUST** submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

PART III -- SOIL RELEASE INFORMATION

Page 4 of 5

Please provide the following information for EACH regulated substance released to the soil at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

Regulated Substance	CAS Registry Number	Highest Concentration Detected Between 0-6 Inches (Specify Units)	Highest Concentration Detected Between 6-24 Inches (Specify Units)	Highest Concentration Detected Greater Than 24 Inches (Specify Units)
Tetrachloroethene	127184	-	-	1.7 mg/kg
Trichloroethene	79016	-	-	0.23 mg/kg

PART IV -- GROUNDWATER RELEASE INFORMATION

Page 5 of 5

Please provide the following information for EACH regulated substance released to the groundwater at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

Regulated Substance	CAS Registry Number	Highest Detected Concentration (Specify Units)	Sample Depth Below Ground Surface (Feet)
Tetrachloroethene	127184	140 ug/L	30
Trichloroethene	79016	12 ug/L	30

CITGO FOOD MART & RETAIL SUITES
1050 HOLCOMBE ROAD, DECATUR, GEORGIA
HSRA INITIAL RELEASE NOTIFICATION - SITE SUMMARY

The site is located over three and a half miles southeast of Decatur, in Dekalb County. (See Figure 1.) The site is located at the northeast corner of the intersection of Holcombe Road and Redan Road, west of Interstate 285. The site consists of three tax parcels, totaling approximately 1.57 acres. (See Figure 2.) The site supports a Citgo-branded convenience store and gas station with retail suites. Adjoining properties include a store to the north, apartments to the west, houses to the southwest and south and Interstate 285 to the east.

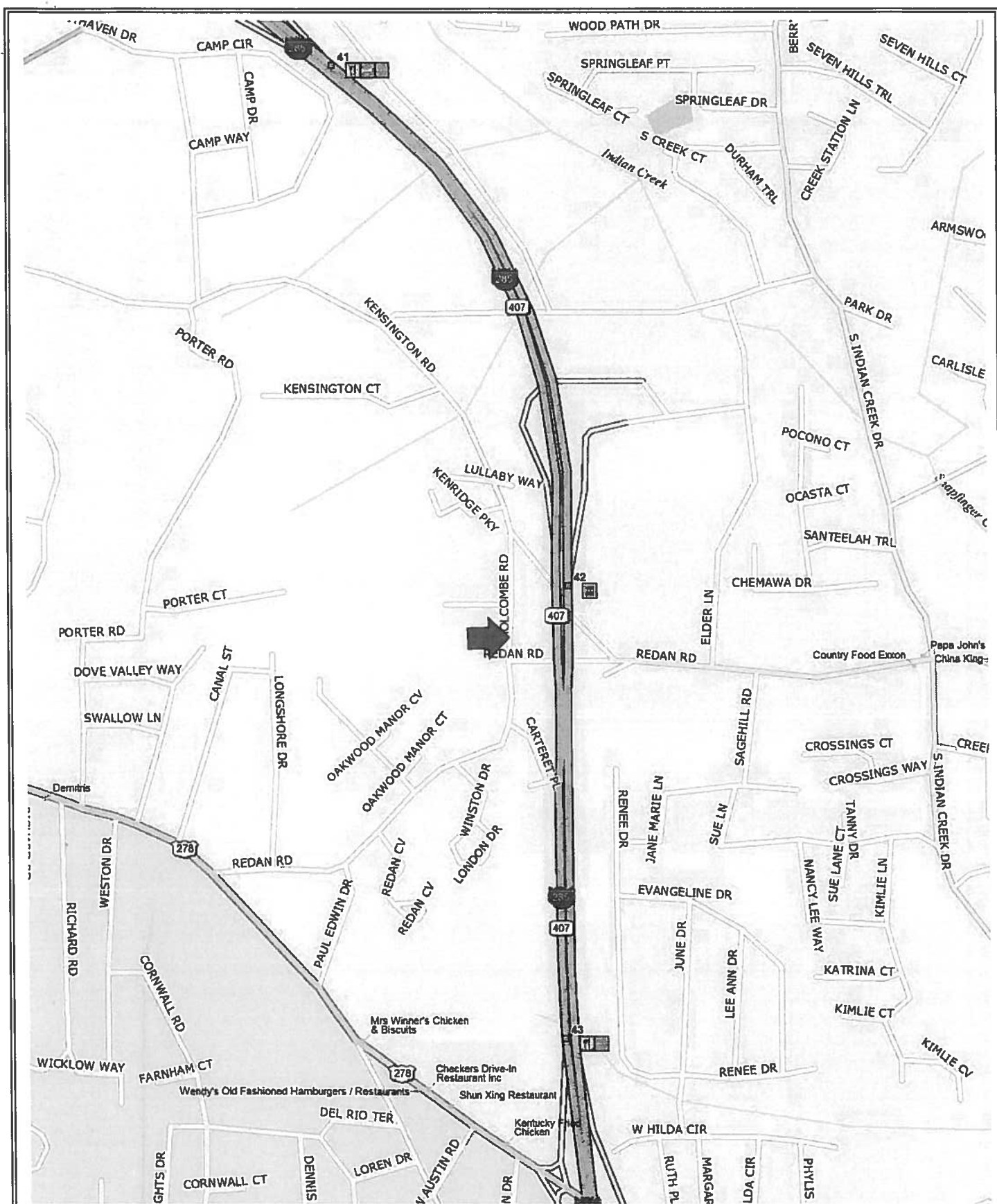
According to available historical information, the site was developed with the current on-site building in 1990. A dry cleaning company, Redan Cleaners, operated from the northernmost suite in the building (Suite 100) from around 1990 through approximately 2002. A Phase II Environmental Assessment was performed at the subject site in December 2004 by Highland Environmental Consulting, Inc. Three boring locations were installed in the vicinity of the former dry cleaning suite. Soil contamination above notification concentrations was identified, including a maximum of 1.7 mg/kg tetrachloroethene and 0.23 mg/kg trichloroethene in a soil sample collected just east of the former dry cleaning suite (B-1). Tetrachloroethene was detected at a maximum concentration of 140 µg/L, as well as 12 µg/L trichloroethene in a boring northeast of the building (B-3). Excerpts from the 2005 Phase II Assessment are attached. In April 2007, a release of tetrachloroethene to groundwater was reported from the adjoining right-of-way (along Holcombe Road, just west of the west site boundary). The EPD issued a no-listing determination for this release on September 13, 2007.

On August 18, 2010 LOGIC completed a Phase II investigation of the subject site. The Phase II was performed to target the former on-site dry cleaners (Suite 100) as well as the on-site gas station. Four boring locations (SB-1, SB-2, SB-3 and SB-4) were installed in the north part of the site in the vicinity of the former dry cleaners. The borings were chosen to mimic those locations that were sampled in the aforementioned 2005 Phase II assessment by Highland Environmental Consulting. (See Figure 3.) A soil and a groundwater sample were collected from SB-1, located just east of the former dry cleaning suite. SB-2 and SB-3 were located northeast of the former dry cleaning suite. Soil was collected from both borings and a groundwater sample was also collected from SB-3. A soil sample was collected from SB-4, north of the former dry cleaning suite. These samples were all analyzed for volatile organic compounds (EPA Method 8260). Three locations in the southwest part of the site (SB-5, SB-6 and SB-7) were positioned around the tank pit and dispensers to address the on-site gas station. Soil and groundwater samples from these borings were analyzed for BTEX (EPA Method 8260).

Soil samples were collected from depths ranging from 5 to 20 feet below the ground surface (bgs). Tetrachloroethene was detected in all four soil samples analyzed for VOCs. Trichloroethene was detected in SB-1 and in SB-2. Cis-1,2-Dichloroethene was detected in SB-1 and methylene chloride was identified in SB-3. The only VOC which exceeded its notification concentration (0.18 mg/kg) was tetrachloroethene, detected in soil samples SB-1 and SB-2 at concentrations of 0.32 mg/kg and 0.72 mg/kg, respectively. These concentrations had declined since the 2005 investigation at the site. Groundwater was encountered at an approximate depth of 38 feet bgs. Trichloroethene was detected at 8.2 µg/L in SB-1, which is below its MCL of 5 µg/L. Tetrachloroethene was identified in SB-1 at 74 µg/L, which exceeds its MCL of 5 µg/L, although this concentration was lower than the highest concentration detected in the 2005 sampling event. No VOCs were detected in the groundwater sample from SB-3. No BTEX constituents were identified in soil and groundwater samples from SB-5, SB-6 and SB-7.

LOGIC performed a survey for potential drinking water receptors. This survey included a driving reconnaissance, a review of the current online USGS National Water Information System (NWIS) and a review of well surveys conducted as part of prior HSRA Notifications in the vicinity of the site. Three domestic wells were identified within a three-mile radius from several sources. None of these were included in the Georgia EPD list of permitted drinking water wells and all were shown as inactive on the most current USGS NWIS search. As such, no drinking water wells were determined to be located within a three mile radius of the site. No previously unreported wells or well structures were identified during driving reconnaissance conducted by LOGIC on March 20, 2014.

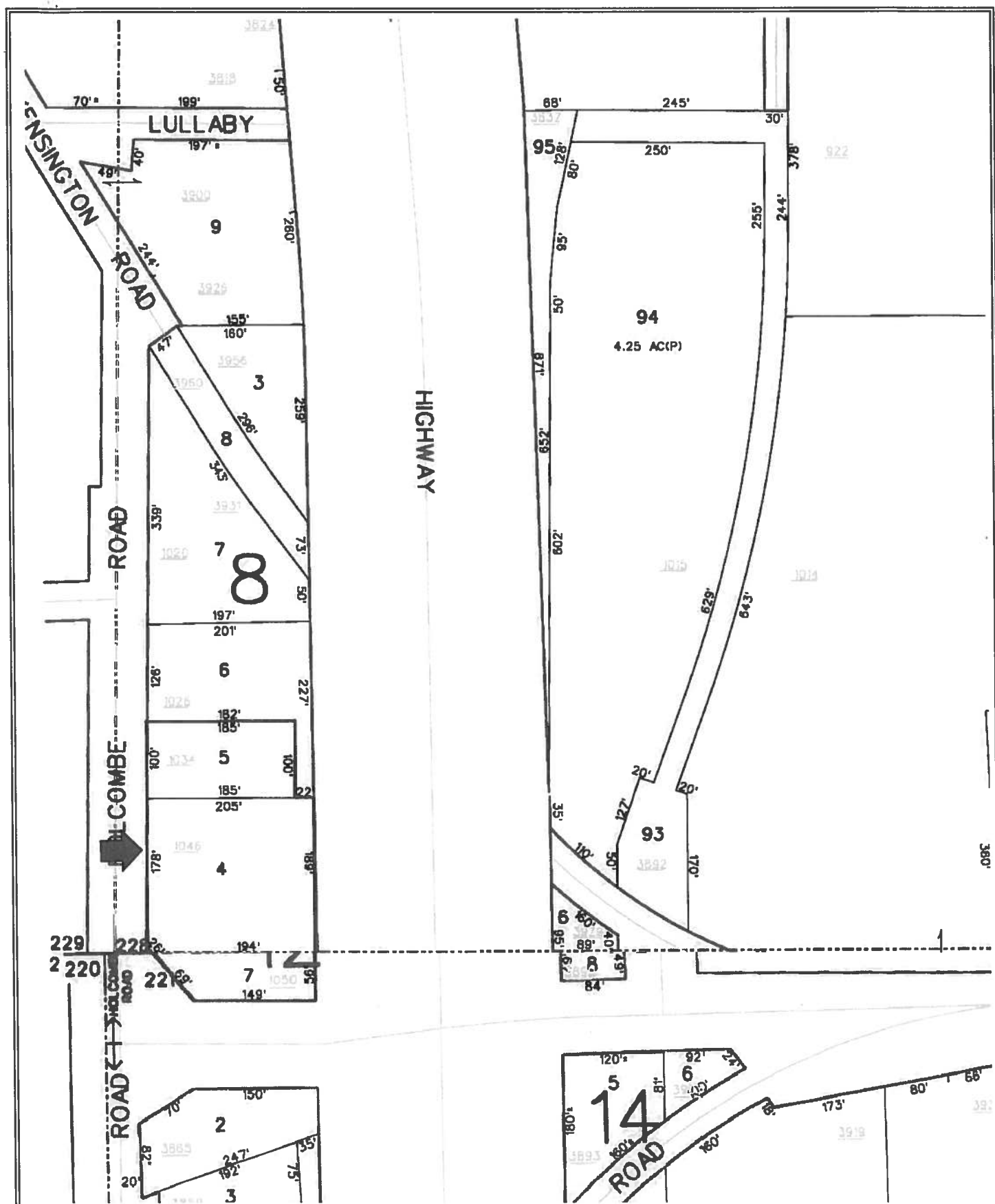
FIGURES



1050 HOLCOMBE ROAD
DECATUR, GEORGIA

LOGIC ENVIRONMENTAL, INC.
3400 MCCLURE BRIDGE ROAD, SUITE F602 ♦ DULUTH, GA 30096

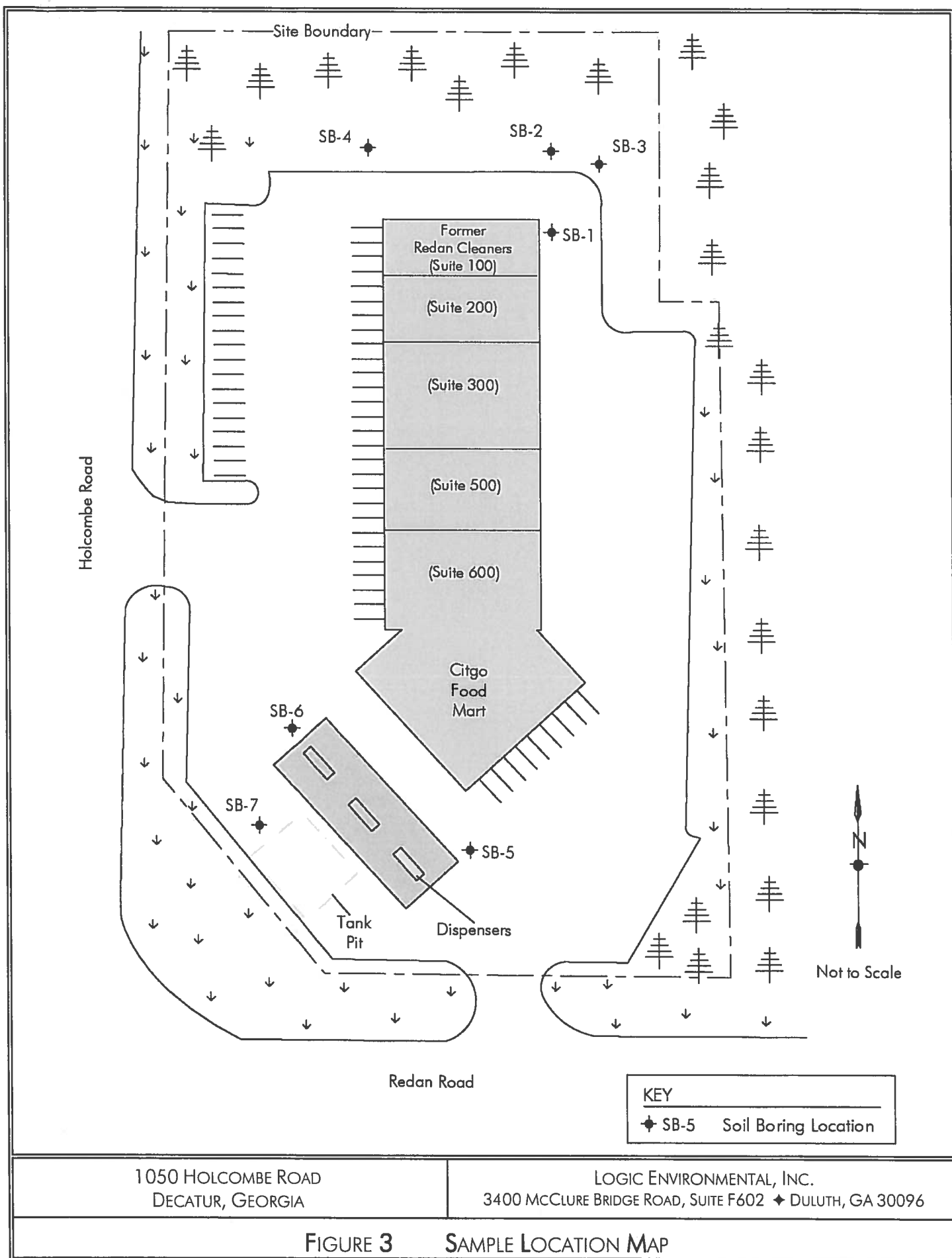
FIGURE 1 SITE LOCATION MAP

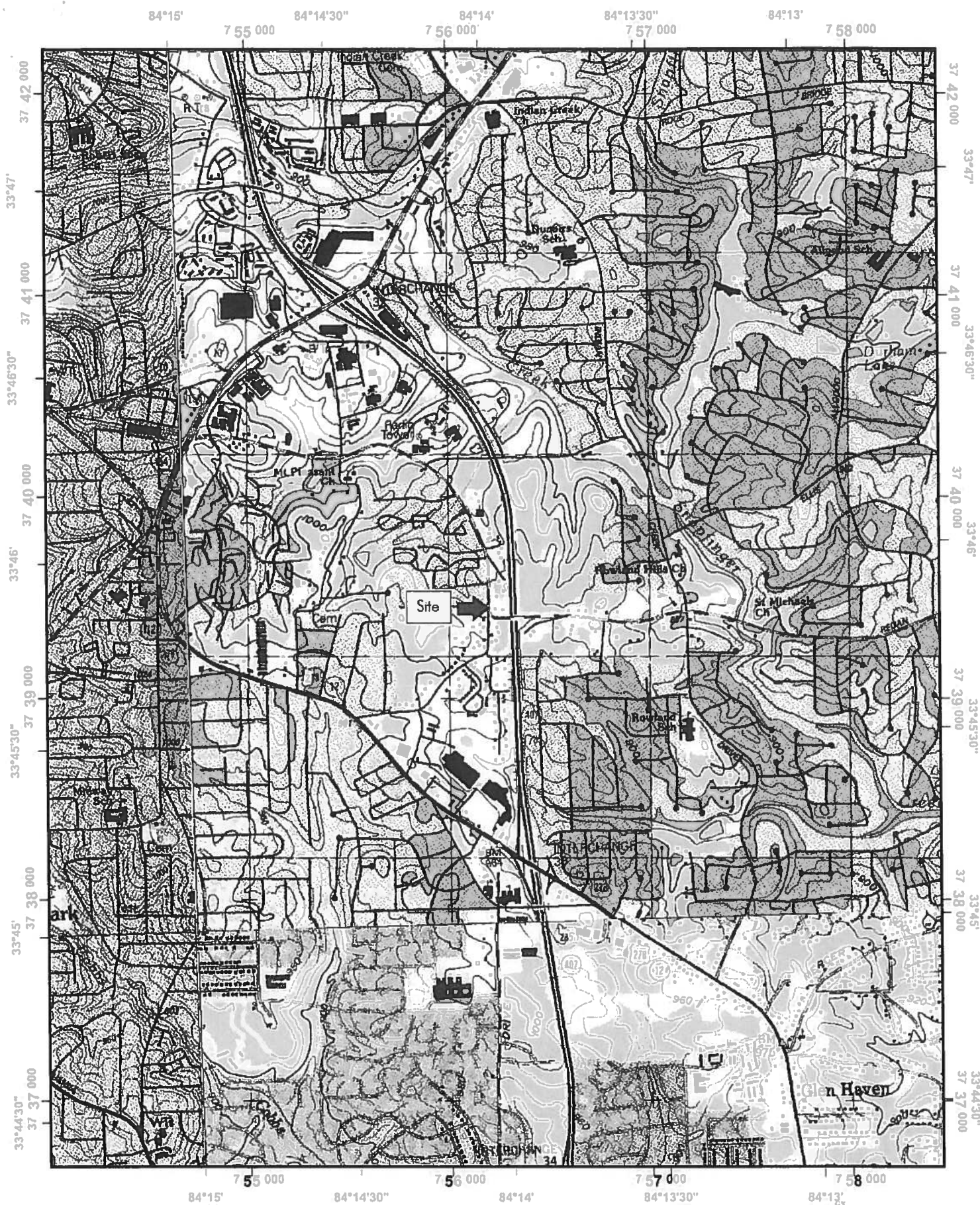


1050 HOLCOMBE ROAD
DECATUR, GEORGIA

LOGIC ENVIRONMENTAL, INC.
3400 MCCLURE BRIDGE ROAD, SUITE F602 ♦ DULUTH, GA 30096

FIGURE 2 TAX MAP





Universal Transverse Mercator (UTM) Projection Zone 10
 North American Datum of 1983
 1000 meter UTM / USNG / MGRS
 Grid Zone Designator: 18S
 100,000-m Squares: GC



Magnetic declination of 2W at center of map
 on March 17, 2011

EXCERPTS FROM
2005 HIGHLAND ENVIRONMENTAL
CONSULTING, INC.
PHASE II ENVIRONMENTAL ASSESSMENT

Highland Environmental Consulting, Inc.

January 6, 2005

Mr. Erik Bykat
Main Street Bank
1636 Mount Vernon Road
Dunwoody, GA 30338

**RE: Phase II Environmental Site Assessment
Holcombe Road Shopping Center
Decatur, Georgia**

Dear Mr. Bykat:

Highland Environmental Consulting, Inc. (HEC) is pleased to present the following report of findings from the Phase II Environmental Site Assessment (ESA) of the Holcombe Road shopping plaza located at 1050 Holcombe Road in Decatur, DeKalb County, Georgia ("Site" or "subject property"). This letter report summarizes the methods used in conducting the Phase II ESA and findings from the investigation.

BACKGROUND INFORMATION

The subject property is developed with a multi-tenant retail shopping plaza. A dry cleaning facility had been a tenant in the shopping center throughout the 1990s until recently. The dry cleaner used Perchloroethene (a.k.a. Tetrachloroethene) in their dry cleaning operations. Recently the operation, Redan Cleaners, was sold to Professional Cleaners and is currently operated as a pickup and drop off location and no dry cleaning is done on-site.

The use of Perchloroethene in the previous operations represents a potential recognized environmental condition on this property.

METHODS AND RESULTS OF INVESTIGATION

HEC recommended that soil and groundwater samples be collected from a minimum of three soil borings on the property. Soil boring B1 was located outside the back door of the dry cleaner. Soil boring B2 was located on the northwest side of the building and directly north of where the dry cleaning equipment was previously located. Boring B3 was located northeast of the dry cleaner adjacent to a storm sewer line that runs north-south east of the dry cleaner building. The locations of these borings are shown in Figure 1.

Soil samples were collected continuously to a depth of 25 to 30 feet during the installation of all borings. The soils on this site were found to be brown and reddish-brown sandy silt to a depth of five feet and brown clayey silt to a depth of 10 to 12 feet. Reddish-brown/tan and dark gray saprolite was encountered from 12 to 19 feet. Brown/reddish-brown/dark gray saprolite was found from 19 to 30 feet. A gray/white/dark gray saprolite was found at 19 to 20 feet below ground surface in boring B2.

After collecting the soil samples, a groundwater sampling tool consisting of a four-foot stainless steel retractable screen with disposable drive point was advanced to depths of 35 to 36 feet below ground surface. A clean polyethylene tube was then inserted through the hollow rods and a peristaltic pump was used to extract water from the borehole.

Groundwater was measured at a depth of 29.5 to 30 feet below ground surface in the borings. The inferred direction of groundwater flow is to the north-northeast.

The soil samples were initially screened in the field using a photoionization detector (PID) to determine total volatile organics present in headspace. This was used to obtain a screening evaluation of potential volatile organics contamination in the soils. The following table summarizes the results of the field screening for volatile organics. Samples are identified with the boring number (B1) followed by the depth at which the sample was collected (0-5').

Table 1
Soil PID Readings
1050 Holcombe Road, Decatur, Georgia

Sample I.D.	PID Reading (ppm)	Sample I.D.	PID Reading (ppm)
B1 – 0-2.5'	2.5	B2 – 10-15'	6.2
B1 – 2.5-5'	2.5	B2 – 15-20'	4.2
B1 – 5-10'	17	B2 – 20-25'	3.2
B1 – 10-15'	22	B2 – 25-30'	4.8
B1 – 15-20'	36	B3 – 0-2.5'	3.6
B1 – 20-25'	6.3	B3 – 2.5-5'	6.8
B1 – 25-30'	7.8	B3 – 5-10'	3.6
B2 – 0-2.5'	3.0	B3 – 10-15'	10.2
B2 – 2.5-5'	2.6	B3 – 15-20'	22
B2 – 5-10'	9.6	B3 – 20-25'	3.6

The soil samples that are highlighted in bold were selected for analyses.

The soil samples were collected using EPA Method 5035. Samples were preserved with Sodium Bisulfite or Methanol then placed on ice. The samples were delivered to Analytical Environmental Services, Inc. of Atlanta, Georgia under proper chain-of-custody for analyses. Each sample was analyzed for volatile organic compounds (VOCs) using EPA Method 8260B. The following table summarizes the results of the soil sample analyses.

6198.

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
 Hazardous Sites Response Program
 Suite 1462, Floyd Tower East
 2 Martin Luther King Jr. Drive, SE
 Atlanta, Georgia 30334-9000

RECEIVED
 Georgia EPD

APR 17 2014

Response and Remediation Program

1. The information provided in this form is for:

- ☒ Initial Release Notification
☐ Supplemental Notification

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

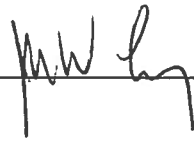
2	EPA ID NUMBER (if applicable)					
3	Tax Map and Parcel ID Number:	14-008000030522	Acreage	0.717		
4	Site or Facility Name	NW Quadrant of Spring Street and Abercrombie Place				
5	Site Street Address	848 Spring Street				
6	Site City	Atlanta	County	Fulton	Zip	30308
7	Property Owner	TSquare Owner, LLC				
8	Property Owner Mailing Address	c/o South City Partners, 3715 Northside Parkway, Suite 1-310, Atlanta, GA 30327				
9	Property Owner City	Atlanta	State	GA	Zip	30327
10	Property Owner Telephone No.	404-583-8047				
11	Site Contact Person	Gerald Pouncey	Title	Attorney		
12	Site Contact Company Name	Morris, Manning & Martin, LLP				
13	Site Contact Mailing Address	3343 Peachtree Road, NE				
14	Site Contact City	Atlanta	State	GA	Zip	30326
15	Site Contact Telephone No.	404-233-7000				
16	Facility Operator Contact Person		Title			
17	Facility Operator Company Name					
18	Facility Operator Mailing Address					
19	Facility Operator City		State		Zip	
20	Facility Operator Telephone No.					

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

John W. Long
NAME (Please type or print)

TITLE Manager

SIGNATURE



DATE

4/14/04

PART II -- RELEASE INFORMATION

Page 2 of 5

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

- 1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:**

The source of the release is unknown, but it is believed to be off-site.

- 2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):**

The date of the release is unknown.

- 3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).**

Soil and groundwater sampling was performed as part of due diligence activities. Five borings/wells were installed and eleven hand-augered borings were installed.

- 4. Access to the area affected by the release. Check the appropriate box:**

- ☐ Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
☐ Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
☒ Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

- 5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.**

- ☐ A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
☐ An engineered and maintained earthen material or compacted fill or a high density synthetic material
☐ Loose earthen fill or native soil
☐ No cover
☐ Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

N/A

PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

☒ Less than 300 feet

☐ 301 to 1000 feet

☐ 1001 to 3000 feet

☐ 3001 to 5280 feet

☐ Greater than 1 mile

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: _____

Address: _____

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

☐ Less than 0.5 miles

☐ 0.5 to 1 mile

☐ 1 to 2 miles

☐ 2 to 3 miles

☒ Greater than 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: _____

Address: _____

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

☐ Yes

☒ No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you **MUST** submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

PART III -- SOIL RELEASE INFORMATION

Please provide the following information for EACH regulated substance released to the soil at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

[illegible]

PART IV -- GROUNDWATER RELEASE INFORMATION

Page 5 of 5

Please provide the following information for EACH regulated substance released to the groundwater at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

[illegible]

Site Summary

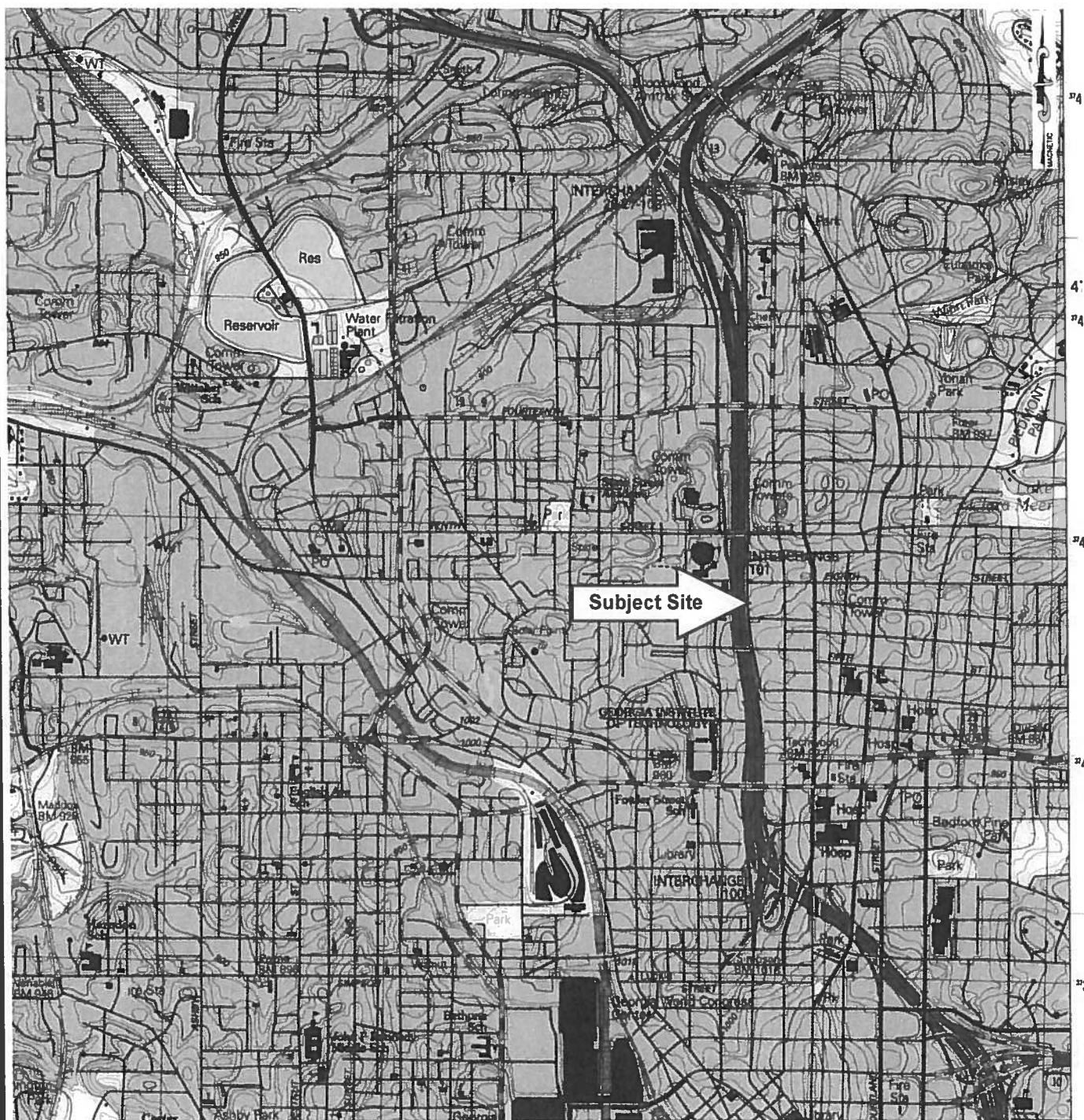
The subject property contains approximately 0.717 acres of land and is located at the northwest quadrant of Spring Street and Abercrombie Place in Atlanta, Fulton County, Georgia. The property is currently undeveloped and was once a small part of the Coca-Cola bottling complex which covered several blocks along Spring Street.

As part of the pre-purchase due diligence activities, a Phase I Report was prepared for the subject property. Numerous Recognized Environmental Conditions (RECs) were identified. As noted above, the subject property was a small part of the much larger Coca-Cola bottling complex which operated between the 1940s and the 1980s. However, based upon our current information, we do not believe any of the operations which could cause environmental impact occurred on the subject property. A small part of the warehouse did extend onto the subject property and several underground storage tanks which were part of the Coca-Cola operations to the west of the subject property were previously removed or closed in place.

Other off-site RECs which were identified included printing and drycleaning to the south, gas stations to the south and southeast, and drycleaning to the east. In addition, contamination had been documented and HSRA No-Listing letters had been issued for sites located within close proximity to the subject property. One of those sites included former Artcraft Engravers/Yamatec Newstand Cleaners located immediately upgradient to the south at 85 5th Street. Two gas stations mentioned above were also immediately upgradient.

Based upon the potential concerns identified within the Phase I Report, Phase II sampling was performed onsite which consisted of eleven (11) hand-augered borings and five (5) borings which were converted to monitoring wells. Soil and groundwater testing was performed for volatile organic compounds (VOCs) and semi-VOCs. Minor concentrations of VOCs were detected in the soil however none of the constituents exceeded their applicable notification concentrations. In groundwater, petroleum constituents and acetophenone were detected in one well (MW-1) and trichloroethylene (TCE) was detected in three (3) wells including MW-1, MW-4 and MW-5. The groundwater contamination is believed to have migrated onto the subject property from off-site sources described above. The highest level of TCE was detected near the southwestern corner of the subject property. The TCE and acetophenone are the subject of this release notification due to the petroleum exemption from release reporting.

Based upon a lack of drinking water wells within three miles of the subject property as documented by the attached Non-HSI map contained in EPD's files with respect to the No Listing letter issued in 2013 for the Centergy North notification located to the north at 930 Spring Street, we believe a No Listing letter is warranted for the groundwater contaminants detected at the subject property. Also, please note that the subject property was entered into the Georgia Brownfield Program prior to purchase in early March 2014.

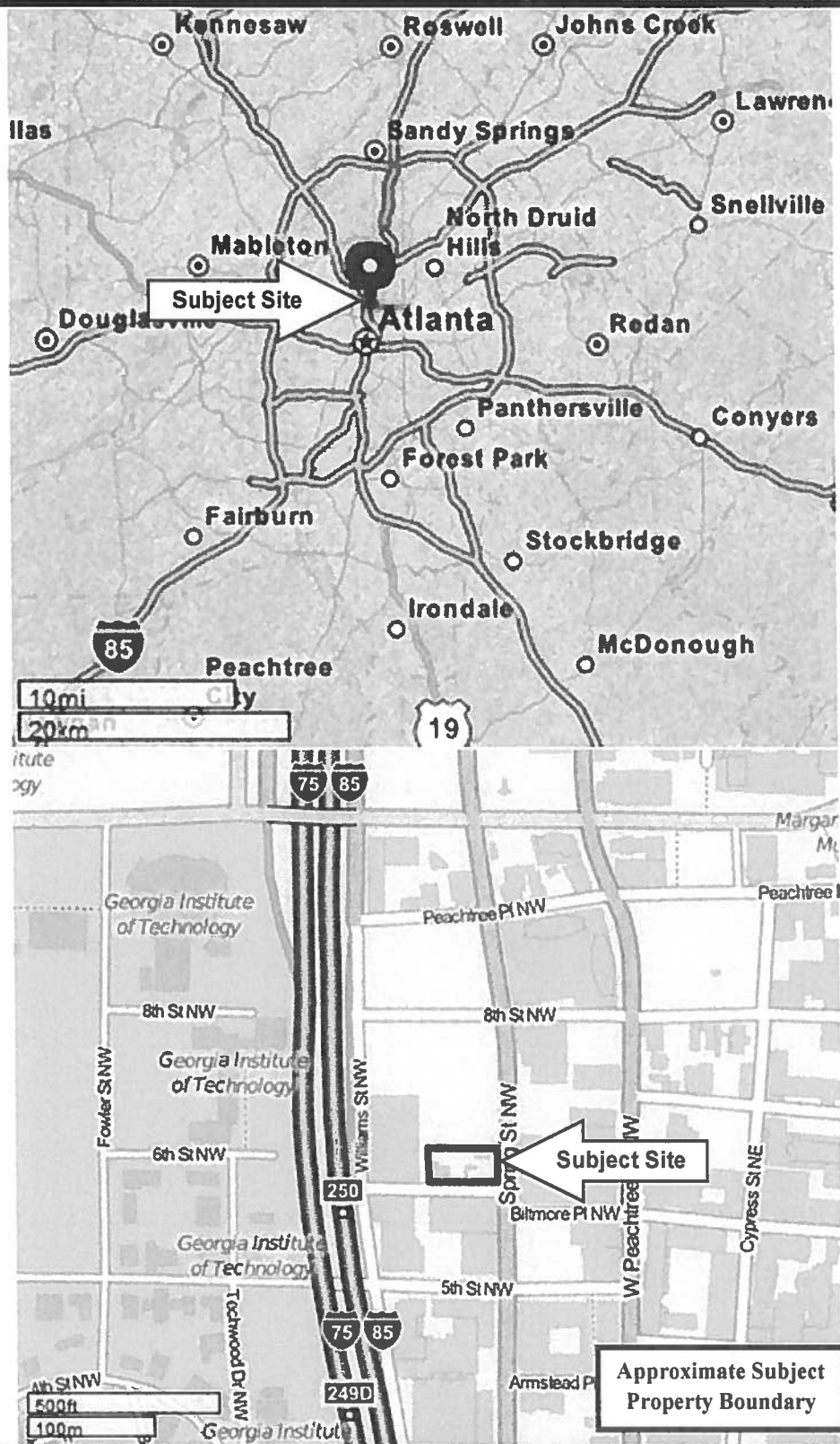


**FIGURE 2
TOPOGRAPHIC MAP**

SOURCE: EDR Report
USGS Northwest Atlanta Topographic Quadrangle
1997, Atlanta, Georgia
SCALE: 1:24000

NOVA
ENGINEERING AND
ENVIRONMENTAL

TSquare Owner, LLC
Abercrombie Place and Spring Street Site
Atlanta, Fulton County, Georgia
NOVA Project Number 3014019



**FIGURE 1
SITE LOCATION MAP**

SOURCE: www.Mapquest.com
DATE: Unknown
SCALE: As Shown

NOVA
ENGINEERING AND
ENVIRONMENTAL

TSquare Owner, LLC
Abercrombie Place and Spring Street Site
Atlanta, Fulton County, Georgia **NOVA**
Project Number 3014019

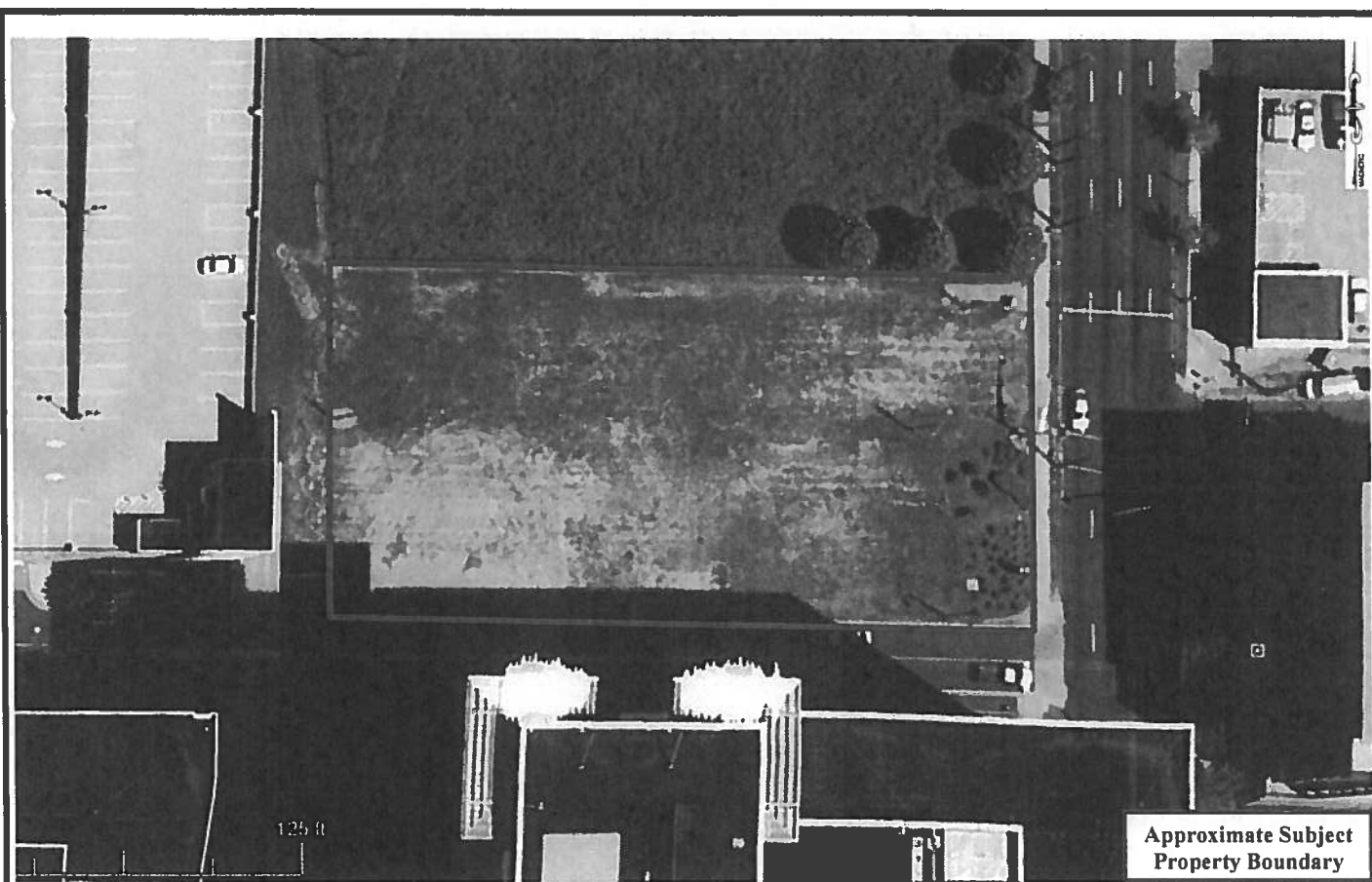
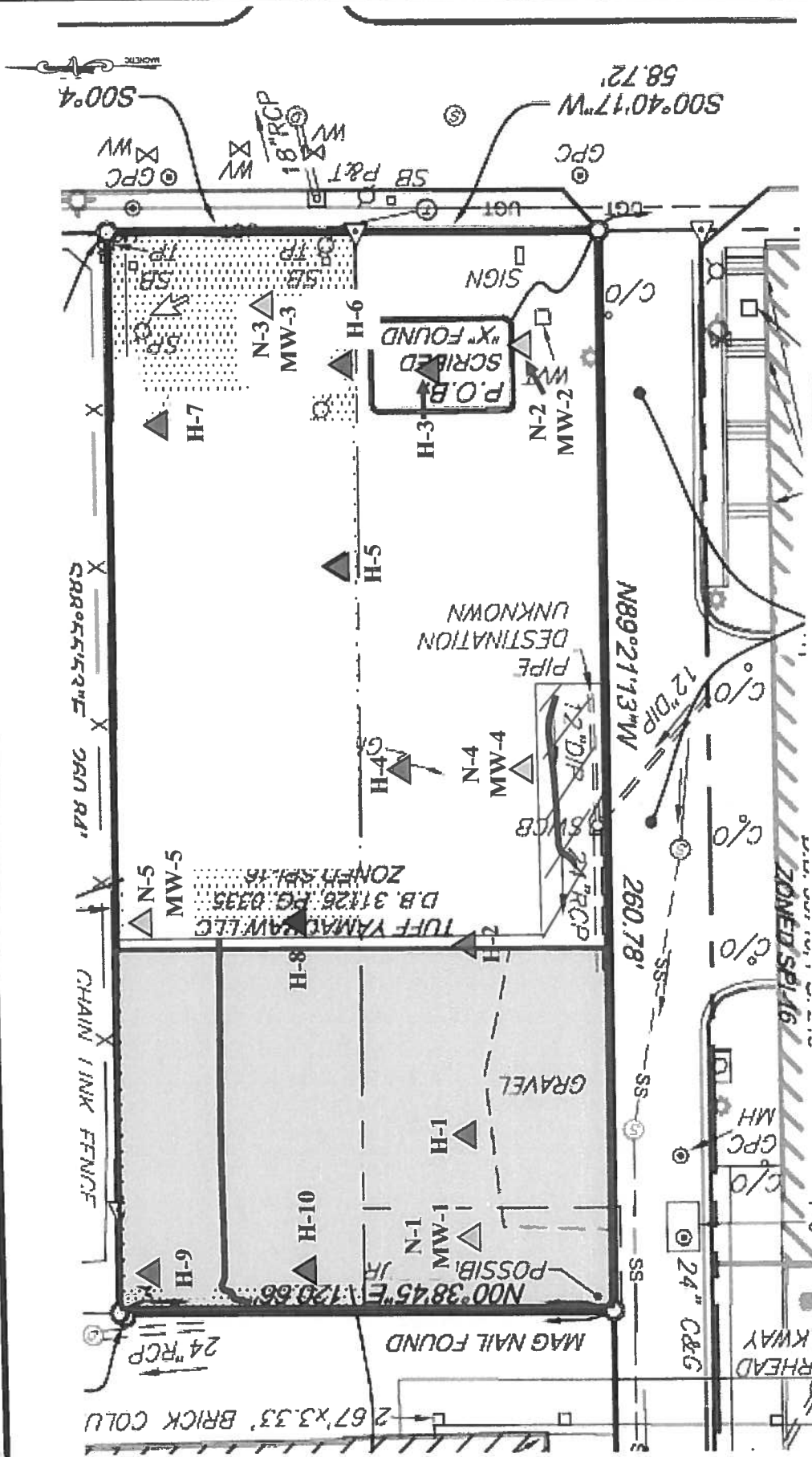


FIGURE 3
AERIAL PHOTOGRAPH

SOURCE: [www. Google.com](http://www.Google.com)
SCALE: As Shown

NOVA
ENGINEERING AND
ENVIRONMENTAL

TSquare Owner, LLC
Abercrombie Place and Spring Street Site
Atlanta, Fulton County, Georgia
NOVA Project Number 3014019



▲ Boring, Monitoring Well, and Sampling Location
 ▼ Hand Auger and Sampling Location

Area of GPR Survey

GPR Anomaly Detected

NOVA
 ENGINEERING AND
 ENVIRONMENTAL

BORING AND SAMPLING LOCATION MAP

SOURCE: Client Provided Survey TSquare Propoert

TSquare Owner, LLC
 NW Quadrant of Spring Street and Abercrombie Place
 Atlanta, Fulton County, Georgia
 NOVA Project Number 3014019



Kasim Reed
MAYOR

CITY OF ATLANTA

OFFICE OF WATERSHED PROTECTION
DEPARTMENT OF WATERSHED MANAGEMENT
72 MARIETTA STREET NW
ATLANTA, GEORGIA 30303-3544

Jo Ann J. Macrina, PE
COMMISSIONER

Hand Delivered

April 23, 2014

Georgia Environmental Protection Division
Hazardous Site Response Program
Suite 1462, East Tower
2 Martin Luther King, Jr. Dr., SE
Atlanta, Georgia 30334



Subject: Release Notification
Hazardous Site Response Program
663 Langston Drive
Atlanta, Georgia

Dear Madam/Sir:

Per requirements of the Georgia Hazardous Site Response Program, the City of Atlanta Department of Watershed Management (DWM) is submitting the enclosed Release Notification/Reporting Form for the property located at 663 Langston Drive in Atlanta, Georgia ("the Property"). DWM is also concurrently submitting an application to enter the property into the Voluntary Brownfields Program per requirements of the Georgia Hazardous Site Reuse and Redevelopment Act.

Please call me (404-546-1227) or Kristina Garcia of my staff (404-546-1255) if you have any comments or questions, or if you need additional information.

Sincerely,

Margaret E. Tanner, PE, Deputy Commissioner
Office of Watershed Protection
Department of Watershed Management

Enclosure

cc: Jo Ann J. Macrina, PE, Commissioner, Watershed Management, COA
Kristina Garcia, PG, Watershed Manager, Watershed Management, COA
Marc Goncher, Chief Counsel, Law Department, COA

6206

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
Hazardous Sites Response Program
Suite 1462, Floyd Tower East
2 Martin Luther King Jr. Drive, SE
Atlanta, Georgia 30334-9000

1. The information provided in this form is for:

- ☒ Initial Release Notification
☐ Supplemental Notification

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	Not Applicable				
3	Tax Map and Parcel ID Number:	14 010200020451	Acreage	0.52		
4	Site or Facility Name	663 Langston Drive				
5	Site Street Address	663 Langston Drive				
6	Site City	Atlanta	County	GA	Zip	30315
7	Property Owner	City of Atlanta, Department of Watershed Management				
8	Property Owner Mailing Address	72 Marietta Street, NW				
9	Property Owner City	Atlanta	State	GA	Zip	30303
10	Property Owner Telephone No.	Not Applicable				
11	Site Contact Person	Kristina Garcia	Title	Environmental Compliance Manager		
12	Site Contact Company Name	City of Atlanta, Department of Watershed Management				
13	Site Contact Mailing Address	72 Marietta Street, NW				
14	Site Contact City	Atlanta	State	GA	Zip	30303
15	Site Contact Telephone No.	404-546-1255				
16	Facility Operator Contact Person	Margaret Tanner, PE	Title	Deputy Commissioner		
17	Facility Operator Company Name	City of Atlanta, Department of Watershed Management, Office of Watershed Protection				
18	Facility Operator Mailing Address	72 Marietta Street, NW				
19	Facility Operator City	Atlanta	State	GA	Zip	30303
20	Facility Operator Telephone No.	404-546-1227				

21. CERTIFICATION —I certify under penalty of law that I am the owner of the real property described in this Release Notification and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and

Revised May 2008

complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Margaret Tanner, PE
NAME (Please type or print)

Deputy Commissioner

SIGNATURE

TITLE
4/23/14
DATE

PART II -- RELEASE INFORMATION

Page 3 of 7

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:

A Phase I Environmental Site Assessment (ESA) was conducted at 663 Langston Drive in Atlanta, Georgia ("the Property") in January 2014 by Contour Engineering, LLC (Contour). No RECs were identified on the residential property. However, four offsite RECs located upgradient of the Property had the potential to impact groundwater quality upgradient of 663 Langston Drive. The following 4 offsite recognized environmental conditions (RECs) were identified:

- The former Wilkinson S Standard Service was a historical gasoline station that operated in 1971 and was located approximately 400 feet due north and upgradient of the Property;
- The former Bradshaw Texaco Service was a historical gasoline station that operated from 1971 to the mid-1980's and was then utilized as an auto repair shop and located 450 feet northwest and upgradient of the Property;
- The former Snow Laundry & Dry Cleaning was a historical drycleaning facility that reportedly operated in 1957 and is believed to have been located approximately 500 feet northeast and upgradient of the Property along Metropolitan Parkway and in the area of the current-day Highway 166; and
- The former Piedmont Lays Laundry & Cleaning, a historical drycleaning facility that reportedly operated in 1957 and is believed to have been located approximately 650 feet northeast of the Property along Lakewood Avenue and upgradient of the Property.

As a result of findings of the Phase I ESA, a limited Phase II ESA was conducted in March 2014. During the Phase II ESA, temporary monitoring wells were installed and soil and groundwater samples were collected at four locations. No impacted soils were found on the property during the Phase II ESA, but groundwater impacts from the offsite RECs were confirmed. Constituents found in groundwater included tetrachloroethene (PCE) at concentrations of up to 43.5 micrograms per liter (µg/L), acetone at a concentration of 9.16 µg/L, and a methyl-tert butyl ether (MtBE) concentration of 73 µg/L.

The presence of PCE in groundwater is consistent with a release of dry cleaning solvents, likely from historical dry cleaning operations located upgradient of the Property. Acetone may be associated with the historical use of solvent at a former automotive service/repair facility also located upgradient of the Property. MtBE could be associated with the historical releases of gasoline from either a historical auto repair facility and gas stations formerly located upgradient of the Property.

2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):

The date of release of tetrachloroethene (PCE), acetone, and methyl-tert butyl ether (MtBE) to the groundwater is unknown. However, as indicated above, the source of release of the regulated substances likely occurred upgradient of the Property during the years of operation of the facilities identified as RECs.

3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).

As stated above, a Phase II Environmental Site Assessment was conducted for the property in March of 2014. Four direct push technology (DPT) borings were advanced to groundwater. Continuous soil samples were collected at four foot intervals and screened with a photo-ionization detector (PID). PID readings for the soils were low and uniform, which indicates naturally occurring organic content in the native soil. Therefore, no soils were submitted for volatile organic compound (VOC) analysis.

Groundwater samples collected from the borings were analyzed for VOCs using EPA method 8260. Analytical results indicated concentrations of PCE at three of the borings and concentrations ranged from 12.5 micrograms per liter (µg/L) to 43.5 µg/L. Acetone and MtBE were also detected at two of the borings at concentrations of 9.16 µg/L and 273 µg/L, respectively.

Although regulated constituents were detected in groundwater samples collected from the Property, it was reported in the Phase I ESA that there are no groundwater wells within a one-mile radius of the Property. Therefore, public exposure to the impacted groundwater is not likely and no corrective action is planned to address groundwater impacts from upgradient sources.

4. Access to the area affected by the release. Check the appropriate box:

- ☐ Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
- ☐ Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
- ☒ Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

There are no site restrictions on the property. Since the impacted area is limited to groundwater, there is no potential for exposure to the public or nearby property owners.

5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.

- ☐ A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
- ☐ An engineered and maintained earthen material or compacted fill or a high density synthetic material
- ☒ Loose earthen fill or native soil
- ☐ No cover
- ☐ Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

Not applicable. No impacted soil or wastes were found on the property.

PART II -- RELEASE INFORMATION

(Continued)

Page 5 of 7

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

☒ Less than 300 feet

☐ 301 to 1000 feet

☐ 1001 to 3000 feet

☐ 3001 to 5280 feet

☐ Greater than 1 mile

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: HNMC REAL ESTATE PROPERTIES LLC

Address: 651 Langston Drive

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

☐ Less than 0.5 miles

☒ 0.5 to 1 mile

☐ 1 to 2 miles

☐ 2 to 3 miles

☐ Greater than 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: No groundwater drinking wells were found within a one-mile radius of the Property.

Address: Not applicable

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

☐ Yes

☒ No

If yes, provide details on the potentially affected humans or sensitive environments.

N/A

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you **MUST** submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

Page ____ of ____

Please provide the following information for EACH regulated substance released to the soil at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

[illegible]

Page ____ of ____

[illegible]

Site Summary
663 Langston Drive
Atlanta, Georgia 30315

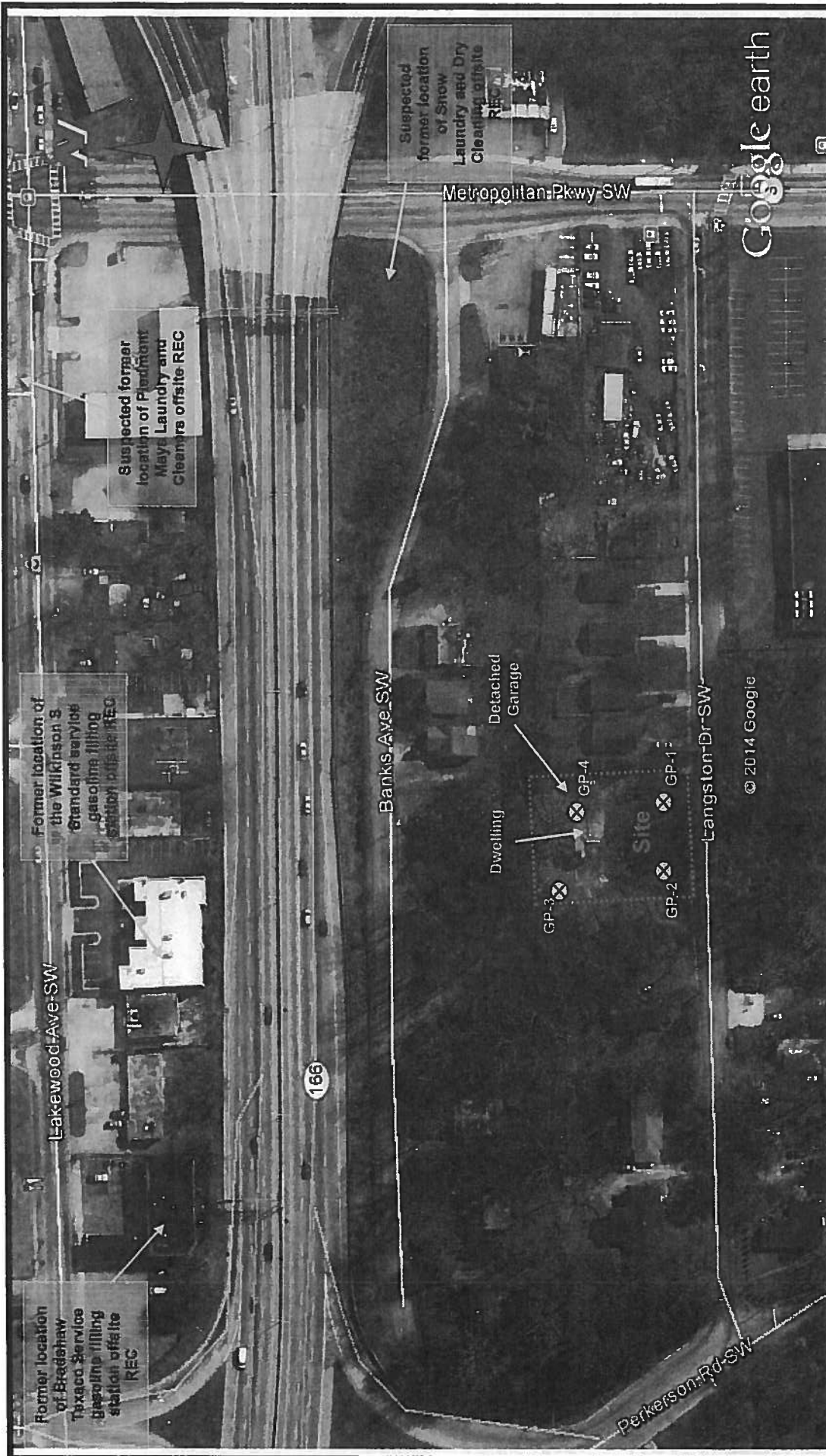
The City of Atlanta's Department of Watershed Management (DWM) purchased the residential property located at 663 Langston Drive in Atlanta, Georgia ("the Property") on March 24, 2014. The Property is currently developed and is approximate 0.52-acre in size. Property improvements include a two-story 1,420 square foot (sq. ft.) residential structure and a two-car detached garage, both of which were reportedly constructed in 1945. Other improvements include a small shed on the backside of the dwelling and a concrete driveway located along the eastern boundary of the Property.

A Phase I Environmental Site Assessment (ESA) was conducted on the Property in January 2014 by Contour Engineering, LLC (Contour). No RECs were identified on the residential property. However, four offsite RECs located upgradient of the Property had the potential to impact groundwater quality upgradient of 663 Langston Drive. The following 4 offsite recognized environmental conditions were identified:

- The former Wilkinson S Standard Service was a historical gasoline station that operated in 1971 and was located approximately 400 feet due north and upgradient of the Property;
- The former Bradshaw Texaco Service was a historical gasoline station that operated from 1971 to the mid-1980's and was then utilized as an auto repair shop located approximately 450 feet northwest and upgradient of the Property;
- The former Snow Laundry & Dry Cleaning was a historical drycleaning facility that reportedly operated in 1957 and is believed to have been located approximately 500 feet northeast and upgradient of the Property along Metropolitan Parkway and in the area of the current-day Highway 166; and
- The former Piedmont Lays Laundry & Cleaning, a historical drycleaning facility that reportedly operated in 1957 and is believed to have been located approximately 650 feet northeast of the Property along Lakewood Avenue and upgradient of the Property.

As a result of findings of the Phase I ESA, a limited Phase II ESA was conducted in March 2014. During the Phase II ESA, temporary monitoring wells were installed and soil and groundwater samples were collected at four locations. No impacted soils were found on the property during the Phase II ESA, but groundwater impacts from the offsite RECs were confirmed. Constituents found in groundwater included tetrachloroethene (PCE) at concentrations of up to 43.5 micrograms per liter (µg/L), acetone at a concentration of 9.16 µg/L, and a methyl-tert butyl ether (MtBE) concentration of 73 µg/L.

Although regulated constituents were detected in groundwater samples collected from the Property, it was reported in the Phase I ESA that there are no groundwater wells within a one-mile radius of the Property. Therefore, public exposure to the impacted groundwater is not likely and no corrective action is planned to address groundwater impacts from upgradient sources



SITE FEATURES MAP

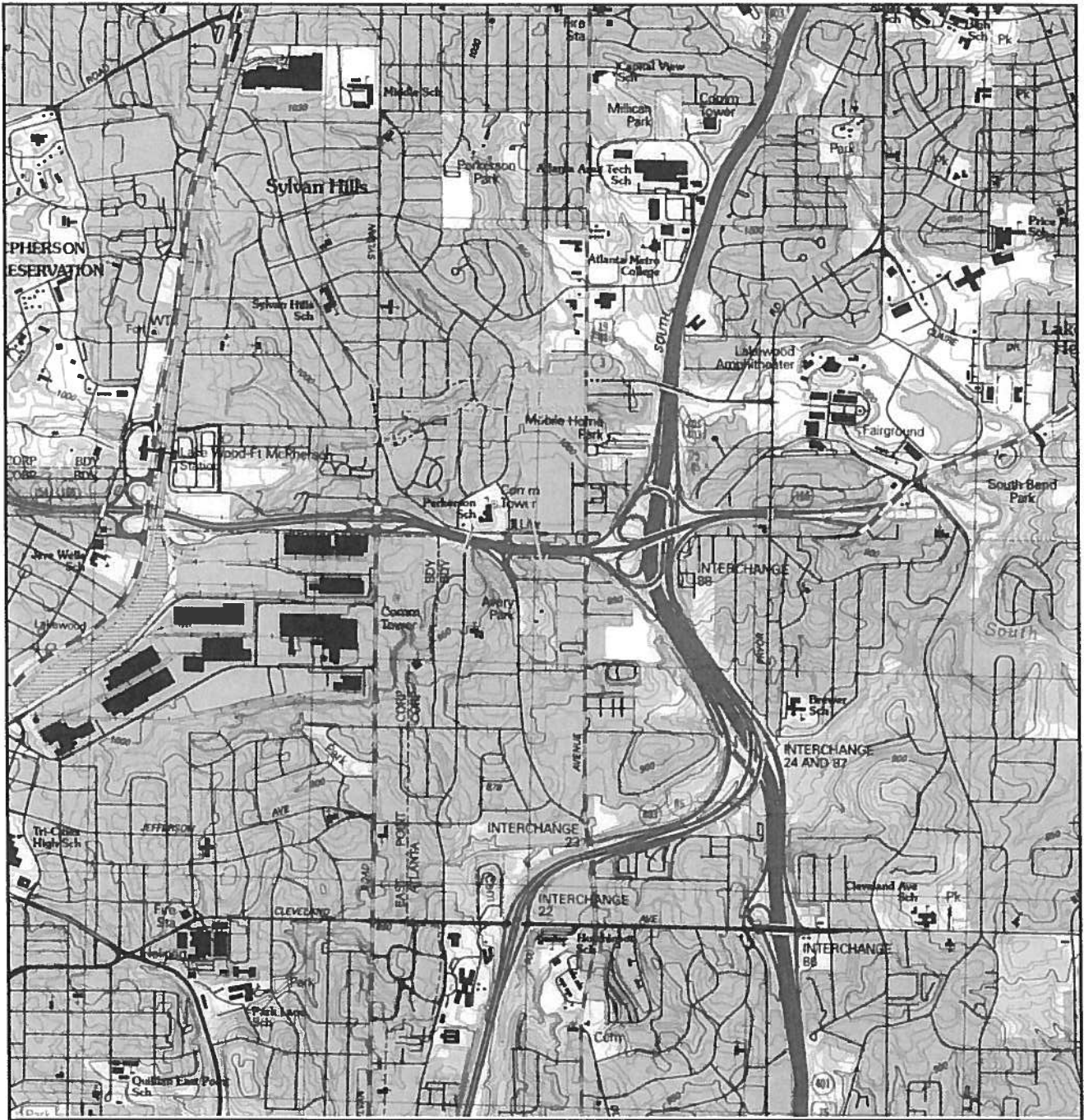
LEGEND


GP-# GeoProbe Boring Location

PROJECT
 Limited Phase II ESA
 Residential Property
 663 Langston Drive
 Atlanta, Fulton County, Georgia
 Contour Project: E14NMI:01

CONTOUR ENGINEERING, LLC

Historical Topographic Map



<div style="text-align: center;"> <p>N</p>  </div>	<p>TARGET QUAD NAME: SOUTHWEST ATLANTA MAP YEAR: 1997 SERIES: 7.5 SCALE: 1:24000</p>	<p>SITE NAME: Atlanta Residential Site ADDRESS: 663 Langston Drive Atlanta, GA 30315 LAT/LONG: 33.6957 / -84.4101</p>	<p>CLIENT: Contour Engineering, LLC CONTACT: Danielle Day INQUIRY#: 3820456.4 RESEARCH DATE: 12/30/2013</p>



RECEIVED
Georgia EPD

THE CLOROX COMPANY

APR 23 2014

April 18, 2014

Response and Remediation Program

KEN14-L-010
Certified

Georgia Department of Natural Resources
Land Protection Branch
Hazardous Waste Management Programs
Suite 1154 1066, East Tower
2 Martin Luther King, Jr. Dr. SW-
Atlanta, GA 30334-9000

RE: Initial Notification to obtain an EPA ID

To Whom it May Concern:

Enclosed, please find the RCRA Subtitle C Site Identification Form to serve as initial notification that Clorox Services Company in Kennesaw, GA will be generating regulated waste at 1000 Cobb Place Blvd. This facility will be a Conditionally Exempt Small Quantity Generator.

If you have any questions, please call me at 925-368-9984 or Amy Zysk at 925-260-3472.

Sincerely,


Kathleen Atencio
Environmental Engineer

Enclosures

APR 23 2014

6199.

OMB# 2050-0024; Expires 12/31/2014

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.	<div style="text-align: right;">Response and Remediation Program</div> <div style="text-align: center;"> United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM </div>			
1. Reason for Submittal MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input checked="" type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location) <input type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below) <input type="checkbox"/> Site was a TSD facility and/or generator of $\geq 1,000$ kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)			
2. Site EPA ID Number	EPA ID Number 			
3. Site Name	Name: Clorox Services Company			
4. Site Location Information	Street Address: 1000 Cobb Place Boulevard, Suite 100			
	City, Town, or Village: Kennesaw		County: Cobb	
	State: Georgia	Country: USA	Zip Code: 30144	
5. Site Land Type	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other			
6. NAICS Code(s) for the Site (at least 5-digit codes)	A. 5 4 1 7 1 2		C. 	
	B. 		D. 	
7. Site Mailing Address	Street or P.O. Box: 4900 Johnson Drive ATTN: Amy Zysk			
	City, Town, or Village: Pleasanton			
	State: California	Country: USA	Zip Code: 94588	
8. Site Contact Person	First Name: Rebecca		MI: Last: Illsley	
	Title: Department Manager, R&D			
	Street or P.O. Box: 1000 Cobb Place Boulevard, Suite 100			
	City, Town or Village: Kennesaw			
	State: Georgia	Country: USA	Zip Code: 30144	
	Email: rebecca.illsley@clorox.com			
	Phone: 770-548-5396	Ext.: 	Fax: 	
9. Legal Owner and Operator of the Site	A. Name of Site's Legal Owner: Cross Creek of Kingsport, LLC and Landings Kingsport, LLC, c/o Cushman & Wakefield of CA		Date Became Owner: 11-19-2010	
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other			
	Street or P.O. Box: P.O. Box 511335			
	City, Town, or Village: Los Angeles		Phone: 	
	State: CA	Country: USA	Zip Code: 90051-7890	
	B. Name of Site's Operator: Clorox Services Company		Date Became Operator: 6-15-2011	
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other			

10. Type of Regulated Waste Activity (at your site)Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.**A. Hazardous Waste Activities; Complete all parts 1-10.**Y ☒ N ☐**1. Generator of Hazardous Waste**

If "Yes", mark only one of the following – a, b, or c.

- ☐ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.

- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.

- ☒ c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities in 2-4.

Y ☐ N ☒

- 2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.

Y ☐ N ☒

- 3. United States Importer of Hazardous Waste**

Y ☐ N ☒

- 4. Mixed Waste (hazardous and radioactive) Generator**

Y ☐ N ☒

- 5. Transporter of Hazardous Waste**
If "Yes", mark all that apply.

- ☐ a. Transporter
☐ b. Transfer Facility (at your site)

Y ☐ N ☒

- 6. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste Part B permit is required for these activities.

Y ☐ N ☒

- 7. Recycler of Hazardous Waste**

Y ☐ N ☒

- 8. Exempt Boiler and/or Industrial Furnace**
If "Yes", mark all that apply.

- ☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☒

- 9. Underground Injection Control**

Y ☐ N ☒

- 10. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.Y ☐ N ☒

- 1. Large Quantity Handler of Universal Waste** (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.

- a. Batteries ☐
b. Pesticides ☐
c. Mercury containing equipment ☐
d. Lamps ☐
e. Other (specify) _____ ☐
f. Other (specify) _____ ☐
g. Other (specify) _____ ☐

Y ☐ N ☒

- 2. Destination Facility for Universal Waste**

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.Y ☐ N ☒

- 1. Used Oil Transporter**
If "Yes", mark all that apply.

- ☐ a. Transporter
☐ b. Transfer Facility (at your site)

Y ☐ N ☒

- 2. Used Oil Processor and/or Re-refiner**
If "Yes", mark all that apply.

- ☐ a. Processor
☐ b. Re-refiner

Y ☐ N ☒

- 3. Off-Specification Used Oil Burner**

Y ☐ N ☒

- 4. Used Oil Fuel Marketer**
If "Yes", mark all that apply.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K❖ You can **ONLY** Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y ☐ N ☒ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- ☐ a. College or University
- ☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Y ☐ N ☒ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories**11. Description of Hazardous Waste****A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D002						
D003						


B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

OMB#: 2050-0024; Expires 12/31/2014

Y ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

13. Comments

14. **Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Amy Zysk, Snr. Env. Engineer	4/16/2014

April 17, 2014



Mr. David Reuland
Georgia Environmental Protection Division
Hazardous Waste Management Program
2 Martin Luther King Jr Drive SE
Atlanta, Georgia 30334

Re: Former Concrete Pre-Casting Facility
690 Commerce Drive
Macon, Bibb County, Georgia
Terracon Project No. 49137479



Dear Mr. Reuland:

Terracon Consultants, Inc. (Terracon), on behalf of its client Walker Concrete Company, LLC, presents the attached release notification documents for the above-referenced site.

In 2008, Terracon performed a Phase I Environmental Site Assessment (ESA) at the site as part of a pending financial transaction involving the site. The site was a former concrete pre-casting and ready-mix/batch plant that formerly operated under the name Bibb Concrete Pipe Manufacturers, Inc. from the 1950s until the 2000s. At the time the ESA was conducted, the property was vacant. The ESA identified 47 years of former site use by prior site occupants as a concrete pre-casting facility, including possible chlorinated solvent use, as a recognized environmental condition (REC). The ESA recommended additional investigation of site soil and groundwater related to possible chlorinated solvent use. At the time the ESA was conducted, the site owner was listed in Bibb County tax records as RA Bowen, Inc. Walker Concrete Company, LLC had neither conducted operations at nor was it the site owner.

Per the ESA's recommendations and still prior to acquisition of the site by Walker Concrete Company, LLC, a Limited Site Investigation (LSI) was performed at the site. The LSI consisted of the advancement of five borings at the site and the collection of soil and groundwater samples. Soil and groundwater samples were analyzed for volatile organic compounds (VOCs) by EPA Method 8260 and polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8270. VOCs or PAHs were not detected in soil samples analyzed, and PAHs were not detected in groundwater samples analyzed, but tetrachloroethene (14 ug/L) and trichloroethene (11 ug/L) were detected in site groundwater. Depth to groundwater in the well where chlorinated solvents were identified was measured at approximately 6 feet below ground surface (bgs). Depth to groundwater in other wells at the site was measured between 3 and 8 feet bgs.

Walker Concrete Company, LLC recently purchased the site. As of December 2013, the site remained vacant (as it was in 2008 when the ESA was conducted) and the site had not been redeveloped or repurposed by its new owner. In December 2013, Terracon performed a potable water well survey of the area within one mile of the site. The survey identified no potable water wells located within the one mile search area, and identified the nearest residences located approximately 1,200 feet east and north of the site.

Terracon Consultants, Inc. 2855 Premiere Parkway Suite C, Duluth, Georgia 30097
P [770] 623 0755 F [770] 623 9628 terracon.com

Geotechnical



Environmental



Construction Materials



Facilities

Former Concrete Pre-Casting Facility

690 Commerce Drive ■ Macon, Georgia

April 17, 2014 ■ Terracon Project No. 49137479



Terracon presents the attached release notification documents on behalf of the new property owner.

If you have any questions regarding the material presented herein, please contact Rob Deal at 770-623-0755.

Sincerely,

Terracon

A handwritten signature in black ink, appearing to read "Robert L. Deal, Jr.".

Robert L. Deal, Jr., P.G.
Senior Geologist

A handwritten signature in black ink, appearing to read "Christopher S. Srock".

Christopher S. Srock
Senior Principal

Attachments:

Release Notification Form

Site Summary

Supporting Documentation for Release Notification

CC: Mr. Spencer Weitman, President – Walker Concrete Company, LLC

6200

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
Hazardous Sites Response Program
Suite 1462, Floyd Tower East
2 Martin Luther King Jr. Drive, SE
Atlanta, Georgia 30334-9000

1. The information provided in this form is for:

- ☒ Initial Release Notification
☐ Supplemental Notification

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (If applicable)					
3	Tax Map and Parcel ID Number:	T072-0041	Acreage	4.2		
4	Site or Facility Name	690 Commerce Drive				
5	Site Street Address	690 Commerce Drive				
6	Site City	Macon	County	Bibb	Zip	31217
7	Property Owner	Walker Concrete Company, LLC				
8	Property Owner Mailing Address	2000 Southbridge Parkway, Suite 600				
9	Property Owner City	Birmingham	State	AL	Zip	35209
10	Property Owner Telephone No.	205-423-2600				
11	Site Contact Person	Mr. Spencer Weitman	Title	President		
12	Site Contact Company Name	Walker Concrete Company, LLC				
13	Site Contact Mailing Address	2000 Southbridge Parkway, Suite 600				
14	Site Contact City	Birmingham	State	AL	Zip	35209
15	Site Contact Telephone No.	205-423-2600				
16	Facility Operator Contact Person	Mr. Spencer Weitman	Title	President		
17	Facility Operator Company Name	Walker Concrete Company, LLC				
18	Facility Operator Mailing Address	2000 Southbridge Parkway, Suite 600				
19	Facility Operator City	Birmingham	State	AL	Zip	35209
20	Facility Operator Telephone No.	205-423-2600				

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME (Please type or print)

SIGNATURE

TITLE

DATE

R. SPENCER WEITMAN

CEO

R. Spencer Weitman

4-16-2014

PART II -- RELEASE INFORMATION

Page 2 of 5

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:

Source of release is unknown. Soil samples collected at the site did not indicate the presence of compounds identified in site groundwater.

2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):

Date(s) of release and physical state of released materials are unknown. Groundwater samples collected from the site in 2008 identified the presence of tetrachloroethene (14 ug/L) and trichloroethene (11 ug/L) in groundwater.

3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).

A subsurface investigation was performed at the site in 2008. No additional activities have been performed.

4. Access to the area affected by the release. Check the appropriate box:

- ☒ Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
- ☐ Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
- ☐ Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

Site is fenced off and currently unoccupied.

5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.

- ☐ A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
- ☐ An engineered and maintained earthen material or compacted fill or a high density synthetic material
- ☐ Loose earthen fill or native soil
- ☐ No cover
- ☐ Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

☐ Less than 300 feet ☒ 1001 to 3000 feet ☐ Greater than 1 mile
☐ 301 to 1000 feet ☐ 3001 to 5280 feet

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: Unknown

Address: 1900 Jeffersonville Rd, Macon, GA

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

☐ Less than 0.5 miles ☒ 1 to 2 miles ☐ Greater than 3 miles
☐ 0.5 to 1 mile ☐ 2 to 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: Due to the toxicity of the compounds identified in groundwater, a one-mile radius well survey was performed and no wells were identified within the search area. It is assumed that wells could be present located greater than a mile from the site, but this area was not searched.

Address: Unknown

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

☐ Yes ☒ No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://qgsstore.dnr.state.ga.us>.

Page 4 of 5[illegible]

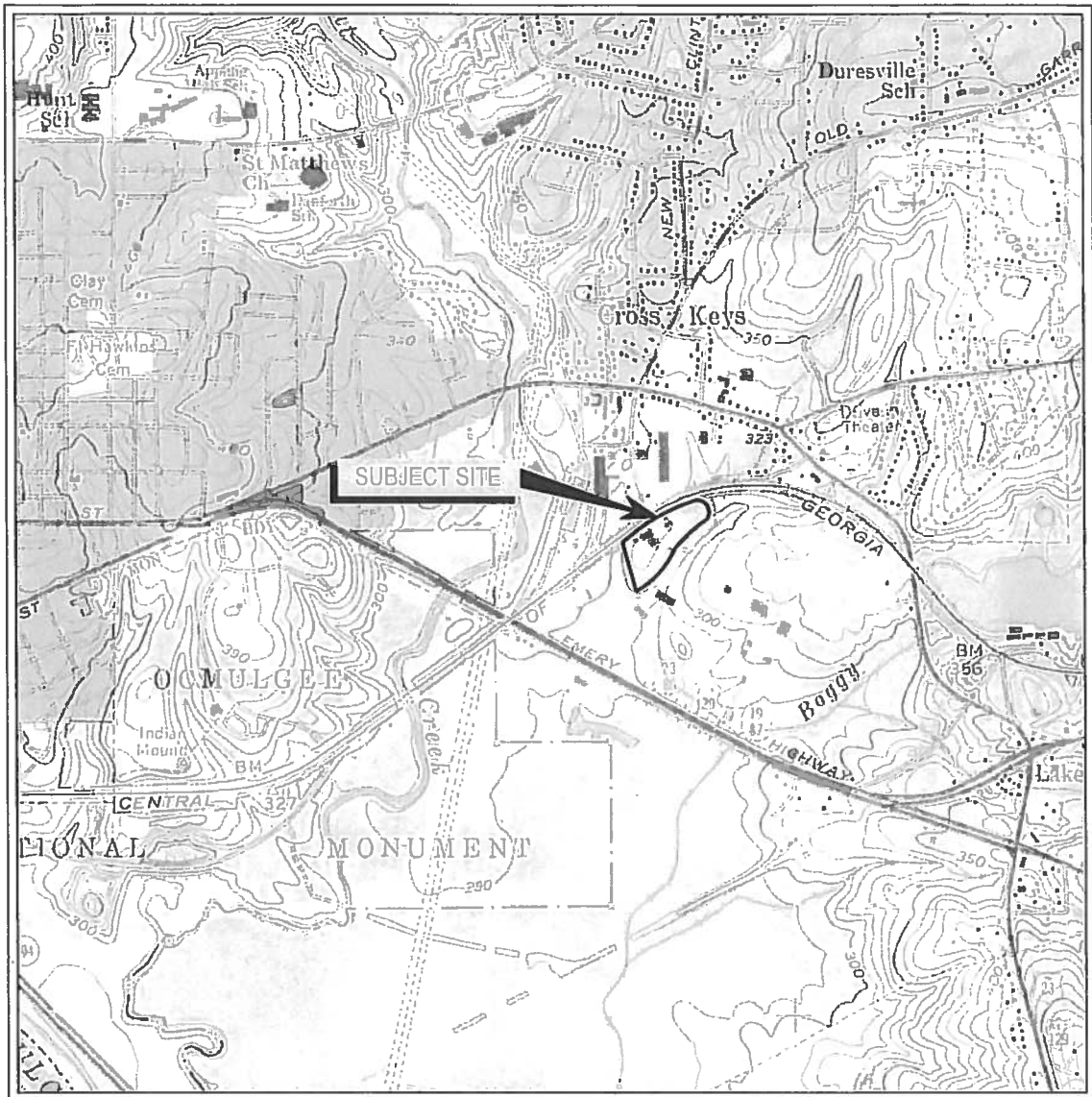
Site Summary
690 Commerce Drive
Macon, Bibb County, Georgia

In 2008, a Phase I Environmental Site Assessment (ESA) was performed at the site. The ESA identified 47 years of former site use by prior site occupants as a concrete pre-casting facility, including possible chlorinated solvent use, as a recognized environmental condition (REC). The ESA recommended additional investigation of site soil and groundwater related to possible chlorinated solvent use.

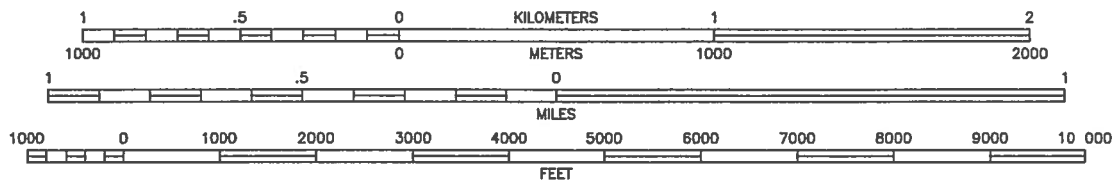
Per the ESA's recommendations and prior to acquisition of the site by its current owner, a Limited Site Investigation (LSI) was performed at the site. The LSI consisted of the advancement of five borings at the site and the collection of soil and groundwater samples. Soil and groundwater samples were analyzed for volatile organic compounds (VOCs) by EPA Method 8260 and polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8270. VOCs or PAHs were not detected in soil samples analyzed, and PAHs were not detected in groundwater samples analyzed. Tetrachloroethene (14 ug/L) and trichloroethene (11 ug/L) were detected in groundwater sample B1. VOCs were not reported above laboratory detection limits in other groundwater samples tested. Depth to groundwater in the well where chlorinated solvents were identified was measured at approximately 6 feet below ground surface (bgs). Depth to groundwater in other wells at the site was measured between 3 and 8 feet bgs.

A potable water well survey was performed for the area within one mile of the site. No potable water wells were identified within the one-mile radius search area. The nearest residence to the site was identified to the east along 1st Street and Avalon Circle, or along Jeffersonville Road to the north. Residences in both of these areas are approximately 1,200 feet from the site. Note that, based on the relative position of the Ocmulgee River to the west of the site, residences near the site are topographically upgradient or crossgradient relative to the site. Residences are not present within 300 feet of the site.

UNITED STATES – DEPARTMENT OF THE INTERIOR – GEOLOGICAL SURVEY



SCALE 1:24 000



CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929
TOPO LINES REPRESENT 10-FOOT CONTOURS

MACON EAST, GA
1956
PR1985
7.5 MINUTE SERIES (TOPOGRAPHIC)



Project Mgr:	EK	Project No.	49087132	<div>Terracon</div> <div>Consulting Engineers and Scientists</div> <div>2855 Premiere Parkway, Suite C Duluth, GA 30097</div> <div>(770) 623-0755 (770) 623-9628</div>	TOPOGRAPHIC VICINITY MAP		FIG. No. 1
Drawn By:	TLY	Scale:	AS SHOWN		PHASE I ENVIRONMENTAL SITE ASSESSMENT MACON, GA SITE (FORMER BIBB CONCRETE SITE)		
Checked By:	MRF/EK	File No.	ES49087132-1		690-720 COMMERCE DRIVE		
Approved By:	CD	Date:	MAY 2008		MACON, GA		

LOG OF WELL NO. B1

Page 1 of 1

CLIENT

Walker Concrete Company, LLC

SITE

690-720 Commerce Drive
Macon, Georgia

PROJECT

Macon, GA Site

GRAPHIC LOG

DESCRIPTION

BOREHOLE DIA.: 2.125 in
WELL DIA.: 1 in
TOP OF PROTECTOR PIPE: NM ft
TOP OF CASING: ft
GROUND SURFACE ELEV.: NM

WELL
DETAIL

DEPTH, ft.

USCS SYMBOL

NUMBER

TYPE

RECOVERY, in.

SPT - N
BLOWS / ft.

WATER
CONTENT, %

FIELD VAPOR
TEST (PPM)*

Surface: asphalt.
Clay, orange, gray, dry, no odor.

Soil sample B1 collected from 2.2 to 4.1 ft
bgs.

6.2

Sand, medium, orange, wet, no odor.

Grades to orange to pale yellow, very wet.

15

Terminated boring at 15 ft bgs. Temporary
well constructed:
Casing 0 to 10 ft
Screen 10 to 15 ft
Filter pack 8 to 15 ft.

5

CL

1

SS

60

DPT

2

10

SP

2

SS

60

DPT

110

15

SP

3

SS

50

DPT

The stratification lines represent the approximate boundary lines
between soil and rock types: in-situ, the transition may be gradual.

* ND indicates a reading of less than the field detection limit
(FDL) of one (1) part per million isobutylene equivalents (ppmi).

WATER LEVEL OBSERVATIONS, ft

WL 6.35 12:37

WL

WL

Terracon

BORING STARTED 6-4-08

BORING COMPLETED 6-4-08

RIG DPT FOREMAN

LOGGED RLDJr JOB # 49087132A

WELL 99 MACON GA BORELOGS GINT.GPJ TERRACON.GDT 6/16/08

LOG OF WELL NO. B2

Page 1 of 1

CLIENT

Walker Concrete Company, LLC

SITE

690-720 Commerce Drive
Macon, Georgia

PROJECT

Macon, GA Site

GRAPHIC LOG

DESCRIPTION

WELL
DETAIL

DEPTH, ft.

USCS SYMBOL

NUMBER

TYPE

RECOVERY, in.

SPT - N
BLOWS / ft.

WATER
CONTENT, %

FIELD VAPOR
TEST (PPM)*

TESTS

BOREHOLE DIA.:
WELL DIA.:
TOP OF PROTECTOR PIPE:
TOP OF CASING:
GROUND SURFACE ELEV.:

2.125 in
1 in
NM ft
ft
NM

Surface: soil.
Sandy clay, gray, dark gray, root
fragments, no odor.

Soil sample B2 collected from 1.0 to 3.2 ft
bgs.
Grades to orange, light gray.

▽

7.7

Sand, medium, trace clay, orange, red,
no odor.

8.9

Clay, trace sand, blue-gray, orange, no
odor.

10.5

Grades to wet.

Sand, medium, light brown, no odor, wet.

13.5

Clay, light brown, no odor, wet.

15

Terminated boring at 15 ft bgs. Temporary
well constructed:
Casing 0 to 10 ft
Screen 10 to 15 ft
Filter pack 8 to 15 ft.

5

CL

1

SS

60

DPT

0

10

SP

2

SS

60

DPT

1

15

SP

3

SS

60

DPT

The stratification lines represent the approximate boundary lines
between soil and rock types: In-situ, the transition may be gradual.

* ND indicates a reading of less than the field detection limit
(FDL) of one (1) part per million isobutylene equivalents (ppmi).

WATER LEVEL OBSERVATIONS, ft

WL ▽ 3.36 13:15 ▽

WL ▽ ▽

WL ▽ ▽

Terracon

BORING STARTED 6-4-08

BORING COMPLETED 6-4-08

RIG DPT FOREMAN

LOGGED RLDJr JOB # 49087132A

WELL 99 MACON GA BORELOGS GINT.GPJ TERRACON.GDT 6/16/08

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
Hazardous Sites Response Program
Suite 1462, Floyd Tower East
2 Martin Luther King Jr. Drive, SE
Atlanta, Georgia 30334-9000

RECEIVED
Georgia EPD

MAY 16 2014

1. The information provided in this form is for:
☐ Initial Release Notification
☐ Supplemental Notification

Response and Remediation Program

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	Not Applicable			
3	Tax Map and Parcel ID Number:	17 015000080459	Acreage	0.69	
4	Site or Facility Name	Commercial Property			
5	Site Street Address	630 10th Street # 937 Fielder Avenue			
6	Site City	Atlanta	County	Fulton	Zip 30318
7	Property Owner *	Robert H. Davis			
8	Property Owner Mailing Address	3248 Millwood Trail			
9	Property Owner City	Smyrna	State	GA	Zip 30080
10	Property Owner Telephone No.				
11	Site Contact Person	Ryan Williams	Title	Consultant	
12	Site Contact Company Name	One Consulting Group			
13	Site Contact Mailing Address	P.O. Box 54382			
14	Site Contact City	Atlanta	State	GA	Zip 30308
15	Site Contact Telephone No.	404-815-8025			
16	Facility Operator Contact Person	Not Applicable	Title		
17	Facility Operator Company Name				
18	Facility Operator Mailing Address				
19	Facility Operator City		State		Zip
20	Facility Operator Telephone No.				

*
21. CERTIFICATION -- I certify under penalty of law that I am the owner of the real property described in this Release Notification and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Robert H. Davis
NAME (Please type or print)
SIGNATURE

OWNER
TITLE
4/30/14
DATE

*Property sold to Martin Rohig III, LLC on April 30, 2014

Revised May 2008

PART II -- RELEASE INFORMATION

Page 2 of 5

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:

Please see attached Phase II Report

2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):

Unknown

3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).

Please see attached Phase II Report and Voluntary Source Soil Removal Report

4. Access to the area affected by the release. Check the appropriate box:

- ☒ Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
☐ Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
☐ Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

Site contains a chain-link fence with locked gates.

5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.

- ☐ A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
☒ An engineered and maintained earthen material or compacted fill or a high density synthetic material
☐ Loose earthen fill or native soil
☐ No cover
☐ Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

Soil impacts have been Remediated.

PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

☒ Less than 300 feet ☐ 1001 to 3000 feet ☐ Greater than 1 mile
☐ 301 to 1000 feet ☐ 3001 to 5280 feet

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: Ten Side Apartments

Address: 1000 Northside Drive NW, Atlanta, GA 30318

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

☐ Less than 0.5 miles ☐ 1 to 2 miles ☒ Greater than 3 miles
☐ 0.5 to 1 mile ☐ 2 to 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: _____

Address: _____

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

☐ Yes ☒ No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

Page 4 of 5[illegible]

Page 5 of 5

[illegible]

29 April 2014

Robert Davis
3248 Millwood Trail
Smyrna, GA 30080

Attention: **Bob Davis**

Subject: **Voluntary Source Soil Removal
Commercial Property
630 10th Street NW
Atlanta, Fulton County, Georgia 30318
One Group Project #A3111.04**

Mr. Davis:

One Consulting Group, Inc. is pleased to provide the following Voluntary Source Soil Removal Report performed at the above-referenced property (Site.)

BACKGROUND

The Site is a 0.69-acre, commercial parcel currently occupied by RHD Utility Locating at 630 10th Street NW and J-Auto at 937 Fielder Avenue NW. The Site has been historically used for automotive repair dating back to its first development. The following recognized environmental conditions (RECs) were identified as associated with the Site during an Environmental Site Assessment (ESA):

- The Site is currently and has historically been occupied by automotive repair facilities from 1950 to the present. Automotive repair facilities use petroleum products and cleaning solvents during daily operations. The Site's historical use as an automotive repair facility for over 50 years is a recognized environmental condition requiring further assessment.
- Reid Provident Laboratories is a historical pharmaceutical manufacturer located at 640 10th Street NW on the west adjacent property. This facility operated from 1975 through 1985 and likely used hazardous substances during daily operations. The potential for historical use of hazardous substances on the adjacent property is considered a recognized environmental condition requiring further assessment.
- Numerous automotive repair facilities and an automotive scrap yard are located on adjoining and nearby properties dating back to 1960. These facilities likely used cleaning solvents and petroleum products in their operations that represent a contaminant risk to the Site groundwater. The ongoing and historical use of the area surrounding the Site is considered a recognized environmental condition requiring further assessment.

- Howell Mill Superfund Site and Atlantic Station are historical industrial properties located within close proximity to the Site. There is the potential that lead-impacted fill material associated with these facilities may have impacted the Site soil. This concern is a recognized environmental condition requiring further assessment.

PREVIOUS ENVIRONMENTAL INVESTIGATIONS

Subsurface investigations performed during December 30, 2013, and January 20, 2014 discovered lead above its applicable notification concentration in the Site soil. Twenty-seven soil samples were collected from depth intervals of surficial (0 - 6") to 10 feet below ground surface (bgs.) The soil sampling locations were chosen to best represent soil quality across the Site. These areas are depicted in Figures 2A, 2B, and 2C of Appendix I with their respective laboratory analytical results.

Three groundwater samples were collected from open soil borings depths ranging from nine to 20 feet bgs on December 30, 2013. Tetrachloroethylene and trichloroethylene were discovered above their respective reporting thresholds in the Site groundwater.

The original laboratory analytical reports are provided in the Modified Phase II Subsurface Investigation Report for the Site dated February 11, 2014.

Drinking water supplies were not discovered within a three mile radius of the Site. Due to the highly urbanized nature of the surrounding three mile radius and the availability of municipal water supply, it is unlikely groundwater is used as a drinking water source in this area. The Site is located within 200 feet of a multi-family apartment complex.

A chain-link, security fence is installed around the Site to isolate from public access areas of soil impact above notification concentrations.

SOURCE SOIL REMOVAL

Approximately 185 total tons of soil containing lead concentrations above the notification concentration of 400 parts per million (ppm) were removed from the Site. This source material was identified using laboratory analytical data, as well as visual observations of this non-native material based on color and composition.

Based on soil sampling laboratory analytical results, the excavations were iteratively expanded and re-sampled until soil sampling confirmed lead impact was below 400 ppm. Soil samples were obtained using hand equipment or with excavation equipment. A sufficient amount of soil was homogenized by mixing the collected soil sample in a decontaminated stainless steel tray or bowl with a decontaminated stainless steel trowel or disposable scoop. Prior to collecting each delineation soil sample, the sampling equipment was decontaminated with an Alconox® detergent and deionized water rinse.

Once obtained, soil samples were field preserved, containerized, and transported to Analytical Environmental Services, Inc. (AES) under standard chain of custody protocols for total lead analysis USEPA Method 6010b.

Soils generated during excavation activities were loaded into covered tandem trucks and were immediately transported off-Site for proper disposal.

April 1, 2014

Soil removal was performed in four areas on the southern portion of the Site addressed at 937 Fielder Avenue NW. Excavation area EA-1 was performed on the east side of this property. Impacted soils were removed from excavation area EA-1 to length of nine feet, a width of seven feet, and a depth of five feet. Excavation area EA-2 was performed on the southeastern portion of the property and measured approximately 12 feet in length, six feet in width, and 1.5 feet in depth. Excavation area EA-3 was performed along the southern property boundary that measured approximately ten feet in length, four feet in width, and 1.5 feet in depth. The fourth excavation, EA-4, was performed along the western property boundary. It measured four feet in length, three feet in width, and 1.5 feet depth. One soil confirmation sample was collected from each excavation floor and sidewall. Lead was detected above the notification concentration in soil samples EA-1 North Sidewall, EA-1 East Sidewall, EA-2 Center, EA-2 South Sidewall, and EA-2 West Sidewall at concentrations of 586, 640, 2,100, 409, and 406 ppm, respectively. The soil sample locations are depicted in Figure 3 of Appendix I.

April 3, 2014

Excavation continued at 937 Fielder Avenue NW to remove lead impacted soil in excavation areas EA-1 and EA-2. Soil removal was performed along the north and west sidewalls of excavation area EA-1 extending it to approximately 12 feet in length and nine feet in width. Impacted soils were further removed from the floor, south sidewall, and west sidewall of excavation area EA-2 extending 2.5 feet in depth, four feet in length, three feet in width. A total of five confirmation soil samples were collected from these excavation areas. Lead was detected above the notification concentration in confirmation soil sample EA-1 North Sidewall 2 at a concentration of 472 ppm. The soil sample locations are depicted in Figure 4 of Appendix I.

April 4, 2014

Soil removal was performed in excavation area EA-5 on the northern portion of the Site at 630 10th Street NW. This area measured approximately 12 feet in length, eight feet in width, and 1.5 feet in depth. Soil samples collected from excavation area EA-5 did not contain lead concentrations above the notification concentration of 400 ppm. The soil sample locations are depicted in Figure 5 of Appendix I.

April 25, 2014

Additional soil removal of excavation area EA-1 was performed along its northern sidewall extending it to an approximate length 22 feet. Confirmation samples were collected from the north sidewall, east sidewall, west sidewall, and floor of the excavated area to confirm lead impacted soil above the notification concentration had been removed. Laboratory analytical results indicate lead was not detected above the notification concentration of 400 ppm. The soil sample locations are depicted in Figure 6 of Appendix 1.

CONFIRMATION SOIL SAMPLING

Upon conclusion of excavation and removal, confirmation soil sampling was performed to confirm the completion of soil impacted with lead above 400 ppm. Soil samples were obtained using hand or excavation equipment. Confirmation soil samples were collected along excavation sidewalls at an interval of one soil sample per 25 linear feet and from excavation bottoms at an interval of one soil sample per 200 square feet.

A sufficient amount of soil was homogenized by mixing the collected soil sample in a decontaminated stainless steel tray or bowl with a decontaminated stainless steel trowel or disposable scoop. Prior to collecting each confirmation soil sample, the sampling equipment was decontaminated with an Alconox® detergent and deionized water rinse. Once obtained, soil samples were field preserved, containerized, and transported to Analytical Environmental Services, Inc. (AES) under standard chain of custody protocols for total lead analysis USEPA Method 6010b.

Confirmation soil laboratory analytical results are summarized in Table 1 of Appendix II, and are provided in their entirety in Appendix III.

SOIL TRANSPORT AND DISPOSAL

Excavated lead-impacted soil was loaded into covered dump trucks to isolate and stabilize it for transport. The excavated soils were transported for disposal as per federal, state and local regulations to Pine Ridge Landfill (ID #018-008D [MSWL]) in Griffin, Georgia under standard manifest protocol.

Soil disposal manifests are provided in Appendix IV.

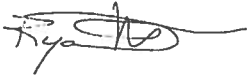
CONCLUSIONS

Based on the laboratory analytical results, soil impacted with lead exceeding the applicable, notification concentration of 400 ppm has been removed from the Site.

CLOSURE

Thank you for the opportunity to be of service. If you have questions or require further information, please feel free to contact us at (404) 815.8005.

Sincerely,
One Consulting Group, Inc.



Ryan Williams
Project Manager



Robert Brawner, CHMM
Principal

Attachments: Appendix I – Figures
 Appendix II – Tables
 Appendix III – Laboratory Analytical Reports
 Appendix IV – Soil Disposal Manifests

Cc: George Rohrig, Cartel Properties, Inc.

APPENDIX I

FIGURES

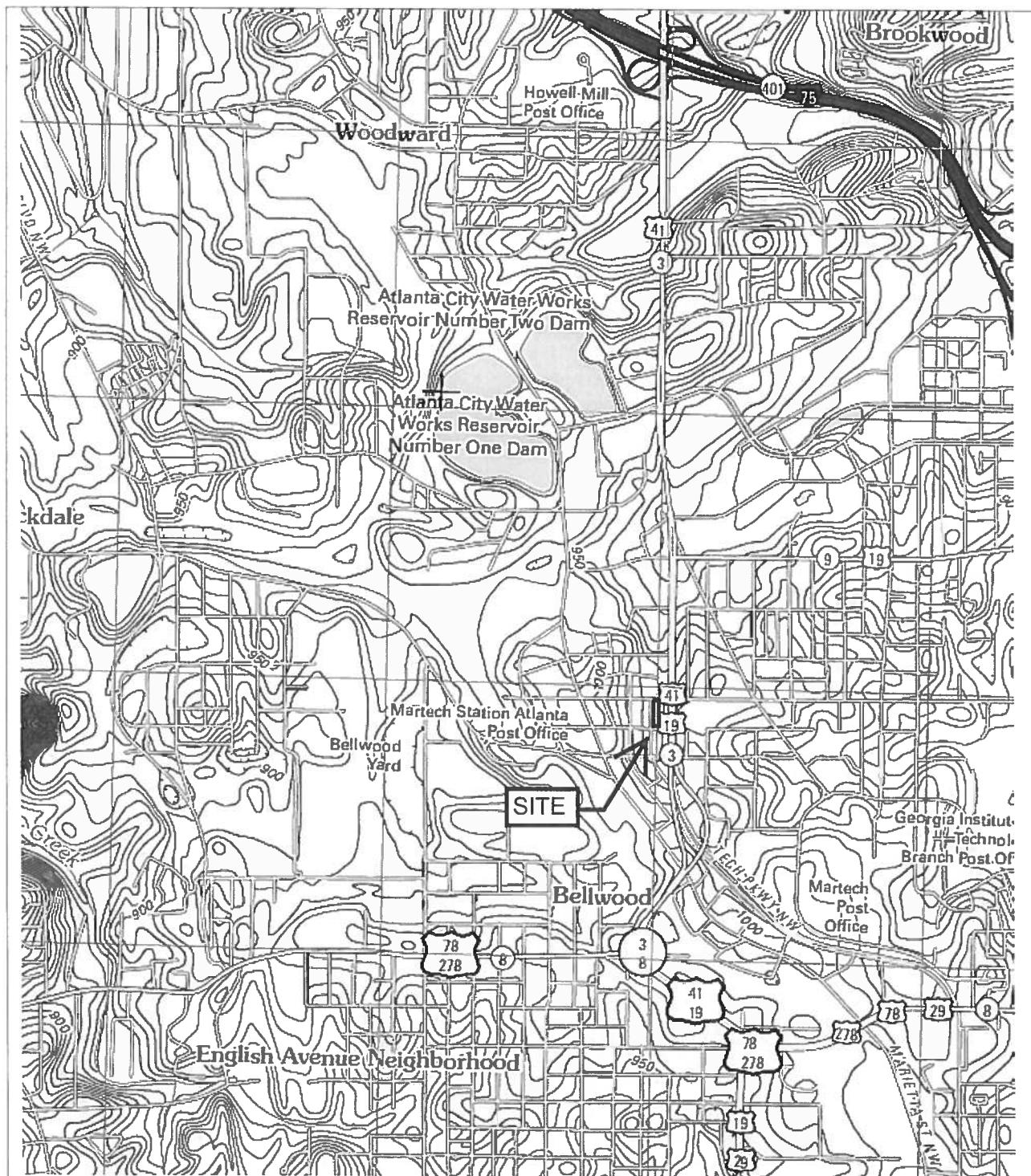
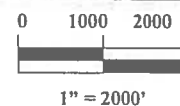


Figure 1 – Topographic Map

Map Date: 2011

Commercial Property
630 10th Street
Atlanta, Fulton County, Georgia

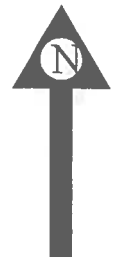


One Group Project#A3111

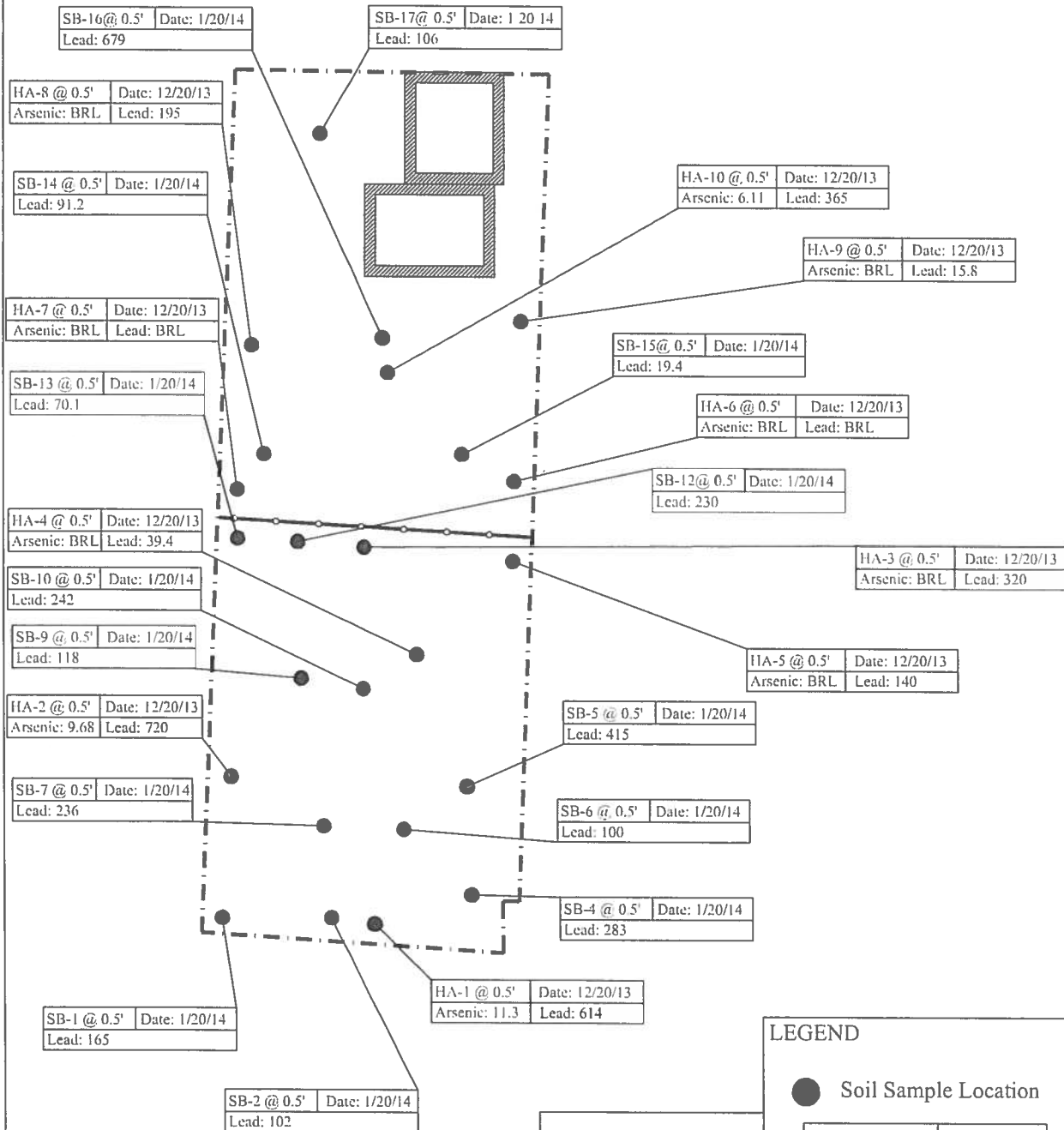
Source: USGS Northwest Atlanta, GA Quad, 7.5-Minute, Topo

Figure 2A
Soil Analytical (0-0.5 Feet Interval)

630 10th Street NW
Atlanta, Fulton County, Georgia 30318
Project #A3111.02
Source: Aerial Photo (2012) and Field Notes



10th Street NW



LEGEND

● Soil Sample Location

Location	Date
Arsenic: Result	Lead: Result

BRL: Below Reporting Limit
Soil results are in mg/kg or ppm

SCALE

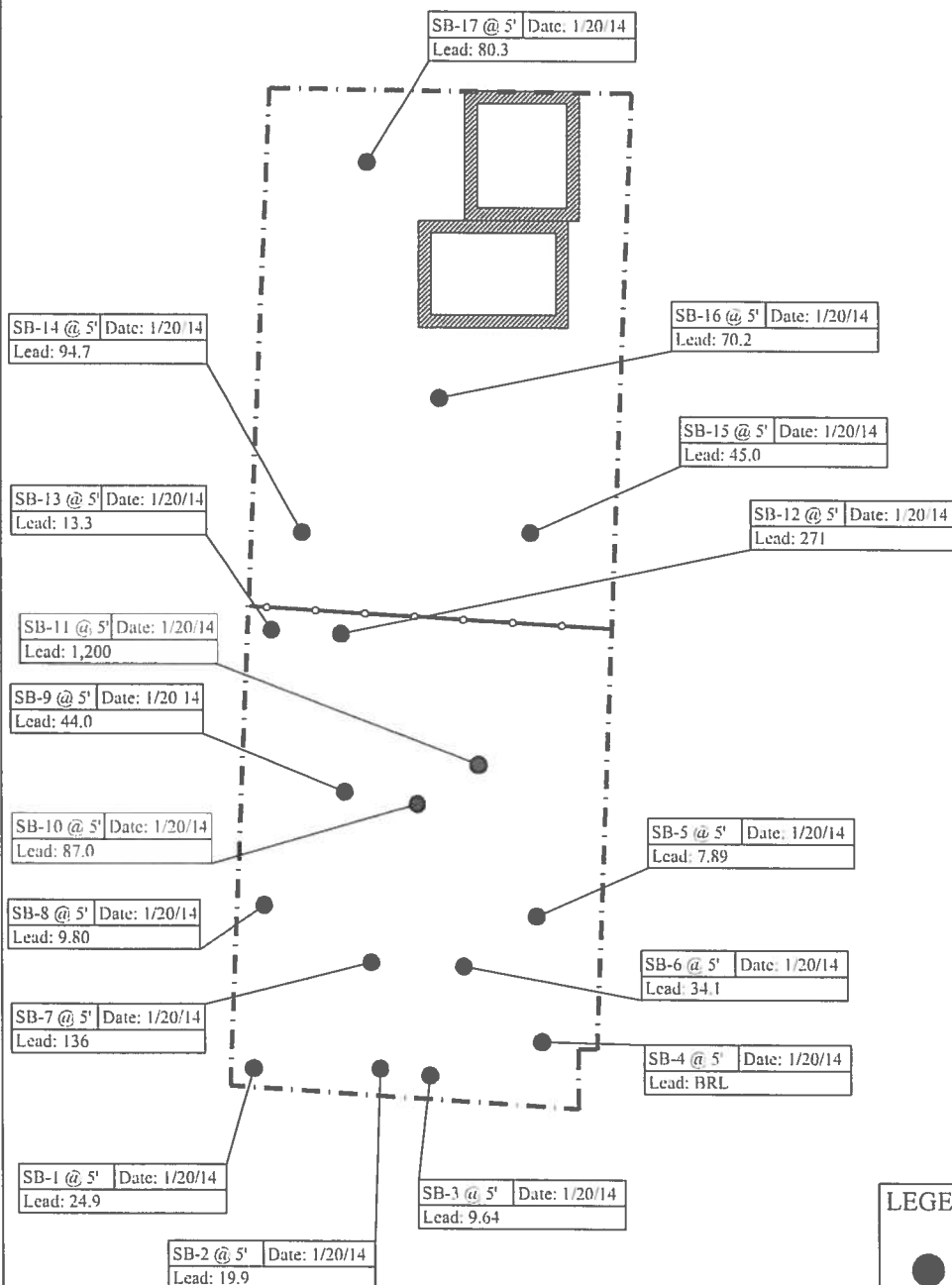


Figure 2B
Soil Analytical (5 Foot Interval)

630 10th Street NW
Atlanta, Fulton County, Georgia 30318
Project #A3111.02
Source: Aerial Photo (2012) and Field Notes



10th Street NW



LEGEND

● Soil Sample Location

Location	Date
Arsenic: Result	Lead: Result

BRL: Below Reporting Limit
Soil results are in mg/kg or ppm

SCALE

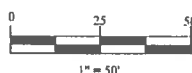
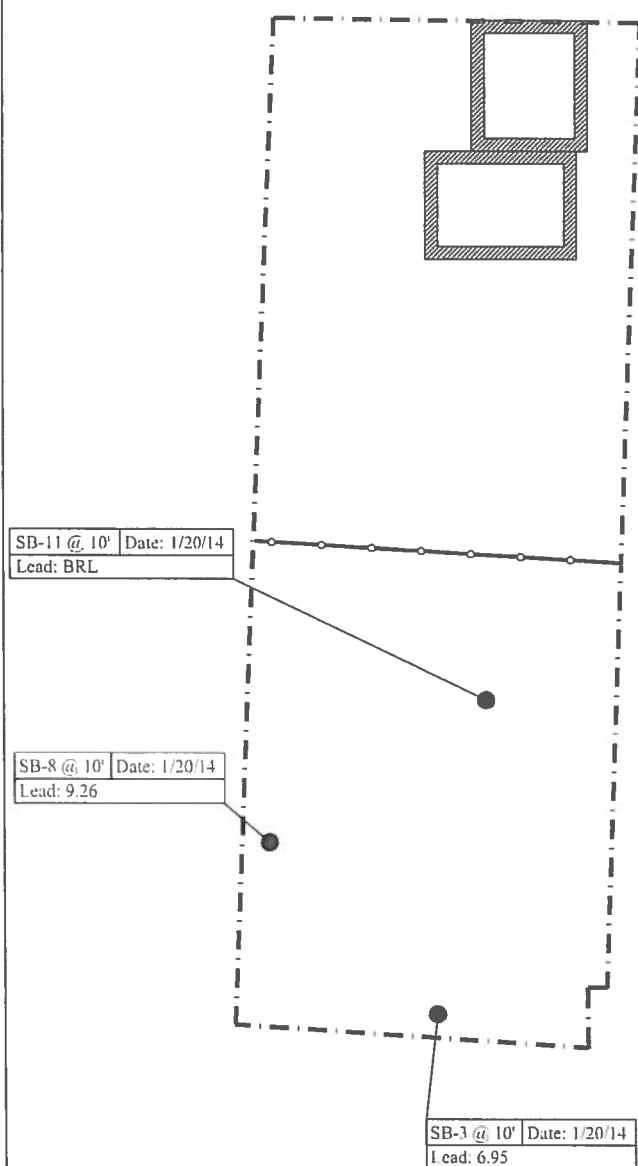


Figure 2C
Soil Analytical (10 Foot Interval)

630 10th Street NW
Atlanta, Fulton County, Georgia 30318
Project #A3111.02
Source: Aerial Photo (2012) and Field Notes



10th Street NW



LEGEND

● Soil Sample Location

Location	Date
Arsenic: Result	Lead: Result

BRL: Below Reporting Limit
Soil results are in mg/kg or ppm

SCALE

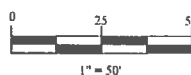


Figure 3
Source Soil Removal 4.1.2014

630 10th Street NW
Atlanta, Fulton County, Georgia 30318
Project #A3111.02
Source: Aerial Photo (2012) and Field Notes



10th Street NW

