



August 8, 2018

Ms. Shannon Ridley  
Brownfields Development Unit  
Land Protection Branch  
Environmental Protection Division  
Floyd Towers East, Suite 1154  
2 Martin Luther King, Jr. Drive SE  
Atlanta, GA 30334

RE: Monitoring and Maintenance Plan  
**0.429 Acre Huff Road Tract**  
903 Huff Road, NW (portion of)  
Atlanta, Georgia  
Project No. 2011.2522.13

Dear Ms. Ridley:

On behalf of WSE Developers LLC and Westside Venture LLC, United Consulting is submitting this Monitoring and Maintenance Plan (MMP) for the above referenced Brownfield property (the 'Subject Site'). The Subject Site is certifying compliance with the Type 5 risk reduction standards (RRSs), which includes institutional and engineering controls. The institutional control includes an environmental covenant (EC) that is inclusive of this MMP. Once the EC and this MMP are approved by the Environmental Protection Division (EPD), and the Prospective Purchaser Compliance Status Report submitted, the EC will be filed at the County.

Please contact Russell Griebel with United Consulting at 770-582-2788, if you have any questions or if we can be of further assistance.

Sincerely,

**UNITED CONSULTING**

Seth Hobson  
Senior Environmental Specialist

Russell C. Griebel, P.G., C.P.G.  
Executive Vice President

SCC/SHH/RCG/ajp  
*SharePoint: 2011.2522.13.MMP*

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**Appendix A**  
Figure – Subject Site Layout

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## INTRODUCTION

The Subject Site consists of one tract of land totaling approximately 0.429-acres. It is part of the address of 903 Huff Road, Atlanta, Fulton County, Georgia. It is referenced by a portion of Parcel ID Number 17 015100040254. The Subject Site is adjoining the Heights at Midtown West multifamily development, which is also part of this referenced tax parcel. The Subject Site is improved with a green space area that services the adjoining development. The layout and boundaries of the Subject Site is illustrated on figure in Appendix A.

WSE Developers LLC entered the Subject Site into the Georgia Brownfield Program through submission of a Prospective Purchaser Corrective Action Plan (PPCAP) dated July 2, 2014. That PPCAP was approved by the Brownfield Program in a letter dated August 7, 2014. The PPCAP was later amended in a letter dated August 25, 2015. The amendment was approved by letter dated March 11, 2016. The PPCAP approach generally included the implementation of a Type 5 risk reduction standard (RRS) due to the depth of impacts, the existing grades and slopes, and the presence of the Water Works Reservoir adjacent to the east and the rail line to the west making it technically impracticable to remediate the soils to the Type 1 to 4 RRS. The primary constituent causing the technical impracticability issue was lead with depths up to approximately 25 feet.

Soils not covered with impervious materials (i.e. asphalt and/or concrete pavers) or on the steep grade change on the west side of the Subject Site were remediated (i.e. removed) as necessary to accommodate the placement of 2 feet of clean soil cover over the impacted areas so that the soils across the Subject Site meets the Type 5 RRS. Exposure to impacted soils with concentrations greater than the commercial Type 3 to 4 RRS will be further mitigated through the use of institutional and engineering controls. The institutional control includes an environmental covenant (EC) that is inclusive of this Monitoring and Maintenance Plan. The EC restricts the use of the Subject Site to non-residential and includes a groundwater use restriction. The engineering controls include the above referenced soil cover and impervious materials limiting access to underlying soils, a fence limiting access to the steep grade on the western portion of the Subject Site, and leaving in place the existing dense vegetation and ground cover on the slope. These areas are illustrated on the figure in Appendix A.

## ENGINEERING CONTROLS

The engineering controls include the two feet of clean soil cover (cap), a fence limiting access to the steep grade on the western portion of the Subject Site, and leaving in place the existing dense vegetation and ground cover on the slope. As required under Section 391-3-19-.07(10) of the HSRA Rules, permanent markers will be installed to call attention to the engineering controls. These will be installed in the locations illustrated on the figure in Appendix A prior to filing of the EPD approved EC.

## LAND USE AND DISTURBANCES

The Subject Site is restricted to only non-residential use as defined under Section 391-3-19-.02 of the HSRA Rules.

Activities that may result in exposure to soils impacted with constituents at concentrations greater than the Type 3 or 4 RRS are prohibited. Activities that may disturb the protective surface cover or the existing dense vegetation and ground cover on the western slope of the Subject Site must be conducted in accordance with this Plan. The top of slope fence on the western portion of the Subject Site must also be maintained. Examples of intrusive activities include, but are not limited to; drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork.

All intrusive activities must be evaluated before implementation to determine applicable health and safety requirements, and waste management and disposal requirements. During implementation of intrusive activities, hardscape and softscape materials will be properly characterized and appropriately managed on-site, and if necessary, disposed of at an offsite disposal facility. Any excavations that are undertaken will be backfilled with clean soil or fill material, and the surface will be restored with material that is comparable to the existing protective surface cover. All intrusive activities will be conducted in compliance with applicable Occupational Health and Safety Administration (OSHA) requirements.

For intrusive activities other than maintenance activities, within 30 days of completion EPD will be provided documentation detailing the nature of such intrusive activities, the actions taken to protect human health during the activities, method and manifests of disposal of impacted soil (if required), and confirmation the property and protective cover have been returned to its original state.

## MAINTENANCE AND INSPECTION

The process to maintain the engineering controls are discussed below. Inspections will be performed periodically, but no less than once per year.

### **Protective Surface Cover**

The protective surface cover at the Subject Site consists of hardscapes and softscapes. The hardscapes include asphalt and/or concrete ground covers. The western fencing is also considered a hardscape. The softscapes include the 2-foot soil cover, and the recent landscaped trees, shrubs, and grasses, and the existing vegetation on the western slope. Both components will be maintained to prevent exposure to soil exceeding the Type 3 and 4 RRS. Specifically, the hardscape protective surface cover at the Subject Site will be maintained to prevent damage that leads to soil exposure. The softscape protective surface cover at the Subject Site will be maintained to prevent soil erosion. The western fence will be maintained to limit access to the western slope. The integrity of the protective surface cover and fence will be inspected periodically by personnel conducting their regular duties maintaining the property and landscaping.

Any maintenance performed on the protective surface cover or fencing will be done in compliance with this Plan. Any significant damage to the protective surface cover or fencing will

be repaired. The repairs will be made in accordance with sound engineering practices, and will be conducted by qualified personnel, as applicable. All records of such repairs will be kept at the property management office for a period of three years from the date of the repair. Such repair records will be made available to EPD upon request.

### **Permanent Markers**

As required under Section 391-3-19-.07(10) of the HSRA Rules, permanent markers will be installed to designate the Subject Site as a restricted area. These will be installed in the locations illustrated on the figure in Appendix A prior to filing of the EPD approved EC. Disturbance or removal of the markers is prohibited. The integrity of the markers will be inspected periodically and maintained. An image of the EPD approved marker is included in Appendix B.

## **PLANNED USES OF THE PROPERTY**

The Subject Site shall be used only for non-residential uses, as defined in Section 391-3-19-.02 of the HSRA Rules. The periodic inspections will verify the use of the Subject Site by owners, tenants, and other occupants to be consistent with non-residential use. Advance notice to EPD in the form of a PPCAP Amendment must be provided for any planned future changes in the use of the Subject Site that will significantly change the condition of the protective surface cover or otherwise significantly impact the engineering controls.

## **UNITED CONSULTING**



## APPENDIX A – FIGURE



## **APPENDIX B – EPD Approved Marker**





1800A SATELLITE BLVD.  
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WORTHING  
WESTSIDE HEIGHTS  
903 HUFF RD  
ATLANTA, GA 30309

# GROUND PLATE

REVISIONS  
06.27.18 - DRS

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DATE: 06/27/18

WO. 1806082



NOT FOR  
PRODUCTION



FRONT  
SCALE: HALF SIZE

## SPECIFICATIONS FOR BRONZE PLAQUE

Bronze Plaque 10"W x 10"H  
5/16" Thick  
Circular  
Raised Copy & Border  
Pebble With Polished Surface  
Double Line Border  
2025 Black Painted  
Per Artfile Supplied  
Semi-Gloss Finish (15% Matte)  
Blind Mount - Standard Studs  
No Rosettes Required

 Raised - Brushed Bronze  
with matte clear finish  
 Recessed - Pebble Finish  
Painted Black

QTY: 2

PROJECT MATERIALS & COLORS

