Smith Wrecking Service Site

Maintenance Plan for Type 5 Area 435 Johnson Drive, Tax Parcel 082-014A Sylvania, Screven County, Georgia HSI #10209

Prepared for:

Georgia Environmental Protection Division Response and Remediation Program 2 Martin Luther King Drive, SE Suite 1462 East Atlanta, Georgia 30334

Prepared by:

Antonia S. Beavers September 15, 2011



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1. PROPERTY OWNER, CONTACT

Mr. Henry Maierhoffer, Jr. 437 Johnson Drive Sylvania, Georgia 30467 Phone Number: 912-564-7450

2. PROPERTY LOCATION

The site is located at 435 Johnson Drive, approximately 0.35 miles east-southeast of the City of Sylvania in Screven County, Georgia, at 32°44′ 36" N and 81°36′ 54" W (Figure 1-1). The Tax Parcel I.D. Number is 082-014A Screven County, Georgia.

3. BACKGROUND

EPD discovered the site during a complaint inspection and conducted a Preliminary Assessment (PA) inspection in January 1985. Based on the findings of the PA inspection, EPD conducted a Site Investigation on March 20, 1985, which was followed by a sampling investigation by USEPA in November 1985. The results of the investigations indicated detections of methyl parathion and Daconil (fungicide) in composite samples from onsite drums and methyl parathion and DDT in soil, some of which were at levels greater than the notification concentrations (NCs) found in Appendix I of Georgia's Rules for Hazardous Site Response (Rules). A groundwater sample collected from the onsite supply well did not contain pesticides above the method detection limit.

The site was listed on the Hazardous Site Inventory (HSI) on June 29, 1994. In response to the site's listing, the property owner, Henry Maierhoffer, Sr., stated that there was some cleanup conducted at the property including removal of debris and surface soil. EPD personnel collected soil and groundwater samples (from the on-site well) on March 13, 1995 and found DDT, DDE, and DDD in soil at concentrations above applicable NCs.

4. CORRECTIVE ACTION

EPD issued a project assignment form (PAF) to ERM Southeast (ERM) in May 2006 for the characterization and remediation of pesticide impacted source and soil material and the investigation of a potential release of pesticides in groundwater at the Smith Wrecking Service Site, HSI# 10209. Based on the site investigation results, ERM removed a total of 1,017 tons of pesticide contaminated soil and debris. EPD determined that groundwater has not been impacted at the site based on samples collected from three (3) borings in June 2006.

While the majority of the site was excavated to less than 1-foot below ground surface (bgs), ERM removed contaminated soil to a depth of 12-13 feet bgs beneath the deck that is constructed on the southern side of the house where some of the highest concentrations of pesticides were encountered. In the early 1990s the house was reportedly built, at least partially, on the existing concrete slab that was used in previous site operations that are believed to be the source of the release of pesticides in soil. During the deck area

excavation, two (2) housental soil samples were collected from beneath the floor slab of the house to assess any potential impact beneath the house. The hand auger was extended 1-foot and (2-3)-feet horizontally beneath the slab of the house for sample collection at a depth of 4 feet below grade. The samples collected beneath the slab were not sufficient to characterize pesticide contamination proximate to and under the house.

At EPD's request, ERM mobilized to the site in August 2010 to further assess any potential impact of pesticide contamination near and beneath the slab of the house along the northern, eastern and western boundaries. Seven (7) soil sample locations were identified to further assess the areas immediately adjacent to and under the Maierhoffer residence. Pesticides were detected in samples SB-1, SB-2, SB-3, and SB-4 at concentrations below residential risk reduction standards (RRS). The portion of the site that remains impacted by pesticides above the applicable RRS is limited to that area proximate to the Maierhoffer residence at ERM borings SB-5, SB-6, and SB-8 and potentially includes the area beneath the residence and the attachments thereto (i.e. finished porch and wooden decking) as shown on Figure 2. Further investigation and remediation of the impacted area is cost prohibitive and was not included in ERM's scope of work. Therefore, the soil was left in place and will be subject to a restrictive covenant. The sample results and approved RRS for the site are presented in Table 1. The area impacted by pesticide contamination above RRS is further described in the March 31, 2011 surveyed plat and accompanying legal description (APPENDIX A).

5. PROPERTY RESTRICTIONS

Any activity conducted in the Type 5 Area that may result in the release of or exposure to the regulated substances that were contained as part of the Corrective Action, or create a new exposure pathway, is prohibited and will be classified as major damage. Activities that may only be performed by qualified personnel include, but are not limited to the following: work necessary for the maintenance, repair, or replacement of engineering controls (footprint of residence, enclosed porches and decking), maintenance or repair of utilities, drilling, digging, piercing the surface, bulldozing or earthwork. Any disturbance to the Type 5 Area is strictly prohibited unless the person(s) implementing said activity is actively certified pursuant to OSHA Hazardous Waste Operations and Emergency Response Standard-29 CFR 1910.120 (hereinafter "HAZWOPER") or equivalent certification.

6. PERMANENT MARKERS

The permanent markers installed on each side of the residence (marble stone and 4 brass markers) to delineate the restricted Type 5 Area shall be maintained pursuant to Section 391-3-19-.07(10) of the Rules. Disturbance or removal of the markers is prohibited.

7. RIGHT OF ACCESS

The property owner shall allow authorized representatives of EPD access to the property for the purpose of inspecting the Corrective Action, collecting samples, determining compliance with the Maintenance Plan for Type 5 Area, and to inspect records associated with the Corrective Action.

8. INSTITUTIONAL CONTROLS

The Property Owner must file a Uniform Environmental Covenant (UEC) required by Section 391-3-19-.08(7) of the Rules.

The Property Owner shall review warranty deeds, mortgages, leases, rental agreements, and any other private property instruments that are thereafter given or caused to be given, which creates an interest in or grants the use of the Type 5 Area to insure that the notice required by the UEC and the following notice required by Section 391-3-19-.08(1) of the Rules has been included in said instrument:

"This property has been listed on the State's Hazardous Site Inventory and has been designated as needing corrective action due to the presence of hazardous wastes, hazardous constituents, or hazardous substances regulated under State law. Contact the property owner or the Georgia Environmental Protection Division for further information regarding this property. This notice is provided in compliance with the Georgia Hazardous Site Response Act."

9. PROPERTY INSPECTIONS

The Type 5 Area including engineering controls shall be inspected annually to assess site conditions. The concrete slab, finished porches, decking, and markers must be maintained and must continue to prevent direct access to the impacted soil. The inspection should document any disturbance of the Type 5 Area and evidence of any damage caused by the prohibited activities listed herein. Any damage to any component of the Type 5 Area should be repaired and a report of the incident should be provided to EPD within thirty (30) days of the occurrence. If a release of regulated substances from the Type 5 Area should occur in any media (soil, groundwater, air), a corrective action plan (CAP) that describes the actions needed to address said release should be provided to EPD within forty-five (45) days of discovery.

10. ANNUAL REPORTING

The property owner shall submit an annual written report to EPD documenting the review of property instruments and the results of the site inspection. Any deviations from the Maintenance Plan for Type 5 Area should be provided in the Annual Inspection Report. The Annual Inspection Report should also provide photo documentation of each side of the Type 5 Area including the decking, enclosed porches, and the five (5) markers. The photographs should include the site name, date, photographers name and title, and a brief photo description. The report must also include the certification found in APPENDIX B. In lieu of the annual written report, the Property Owner may complete and submit the Annual Property Evaluation Form provided in APPENDIX C.

TABLES

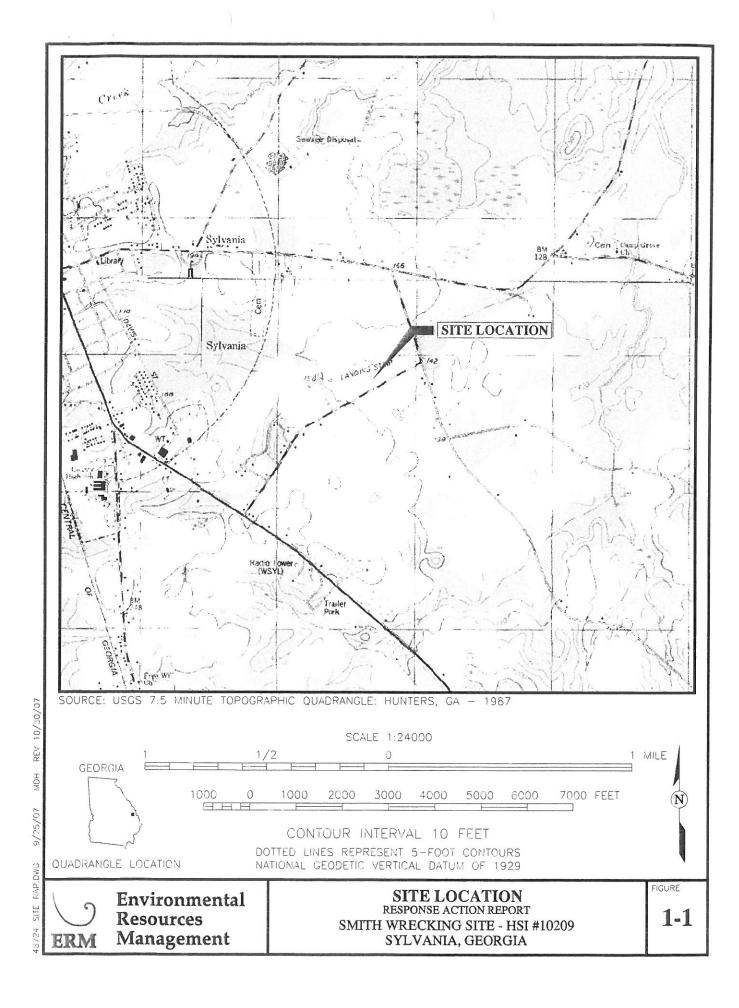
Table 1. Smith Wrecking (HSI No. 10209) Supplement Investigation Soil Samples Comparison to Risk Reduction Standards

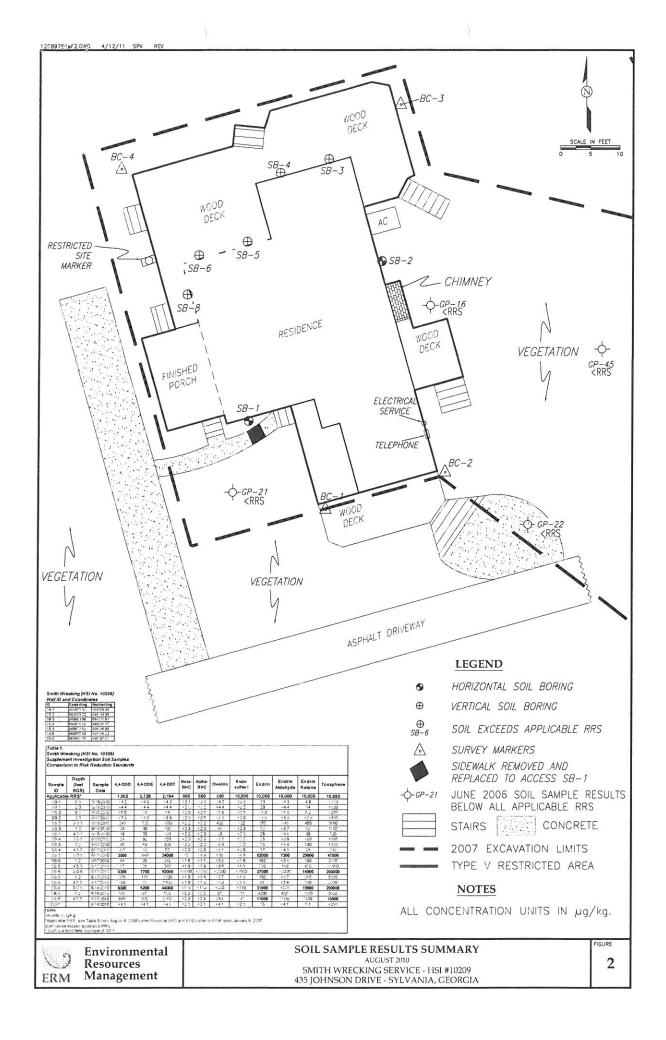
	Sample												
Sample ID	Depth (feet BGS)	Sample Date	4,4-DDD	4,4-DDE	4,4-DDT	BHC	Alpha- BHC	Dieldrin	Endo- sulfan I	Endrin	Endrin Aldehyde	Endrin	Toxaphene
Applicable RRS'	B RRS*		1,902	3,728	2,194	099	099	099	10,000	10,000	10,000	10,000	10.880
SB-1	0-1	8/18/2010	<4.2	<4.2	<4.2	<2.1	<2.1	<4.2	<2.1	13	<4.2	4.8	<210
SB-1	2-3	8/18/2010	<4.4	<4.4	4.4	<2.2	<2.2	<4.4	<2.2	29	<4.4	14	<220
SB-2	0-1	8/17/2010	<5.0	12	15	<2.5	<2.5	<5.0	<2.5	<5.0	<5.0	6.2	<250
SB-2	2-3	8/17/2010	<3.9	<3.9	<3.9	<2.0	<2.0	<3.9	<2.0	<3.9	<3.9	<3.9	<200
SB-3	0-0.5	8/18/2010	340	320	1500	<2.2>	<2.2	420	<22	350	<43	450	0096
SB-3	1-2	8/18/2010	24	30	160	<2.3	<2.3	41	<2.3	52	<4.7	62	1100
SB-3	4.5-5	8/18/2010	18	20	120	<2.3	<2.3	25	<2.3	28	<4.6	38	730
SB-4	0-0.5	8/17/2010	24	92	250	<2.0	<2.0	<3.9	<2.0	28	<3.9	160	1000
SB-4	1-2	8/17/2010	40	63	300	<2.2	<2.2	<4.4	<2.2	75	<4.4	130	1300
SB-4	4.5-5	8/17/2010	6.5	10	52	<2.0	<2.0	<4.1	<2.0	17	<4.1	28	230
SB-5	0-0.5	8/17/2010	3500	840	34000	15	<8.9	930	<8.9	62000	7300	29000	47000
SB-5	1-2	8/17/2010	48	25	340	<1.8	<1.8	<3.6	<1.8	480	<3.6	560	2100
SB-5	4.5-5	8/17/2010	57	26	380	<1.9	<1.9	<3.8	<1.9	710	110	470	<1900
SB-6	0-0.5	8/17/2010	6300	7700	92000	<1000	<1000	<2000	<1000	27000	<2000	14000	200000
SB-6	1-2	8/17/2010	370	150	2100	<1.9	<1.9	<3.7	<1.9	150	<3.7	260	6300
SB-6	4.5-5	8/17/2010	180	71	1100	<1.9	<1.9	<3.9	<1.9	91	<3.9	140	2300
SB-8	0-0.5	8/18/2010	8300	5200	44000	<110	<110	<220	<110	31000	<220	19000	200000
SB-8	1-2	8/18/2010	110	29	520	<2.2	<2.2	97	<11	4200	630	3500	3600
SB-8	4.5-5	8/18/2010	640	300	2100	<2.4	<2.4	280	<47	11000	2000	7400	15000
DUP*		8/18/2010	<4.1	<4.1	<4.1	<2.1	<2.1	<4.1	<2.1	15	<4.1	5.1	<210
Aleten													

Notes:

All units in ug/Kg
*Applicable RRS- see Table 5 from August 4, 2006 Letter Report to EPD and EPD's letter to ERM dated January 9, 2007
Bold values exceed applicable RRS
*DUP is a blind field duplicate of SB-1

FIGURES





Appendices

APPENDIX A PROPERTY DESCRIPTION

LEGAL DESCRIPTION TYPE 5 AREA

THAT BUILDING AND CERTAIN ATTACHMENTS LOCATED WITHIN PARCEL 3 IN THE 34^{th} G.M. DISTRICT OF SCREVEN COUNTY, GA AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT AT THE SOUTHWESTERN INTERSECTION OF PEEPLES FARM ROAD AND JOHNSON DRIVE WITH GA STATE PLANE EAST ZONE COORDINATES OF N. 998,658.00 AND E. 671,765.85, ALSO KNOWN AS THE POINT OF COMMENCING;

THENCE FROM SAID POINT ALONG THE NORTHERN RIGHT-OF-WAY OF JOHNSON DRIVE S $59^{\circ}20'44"$ W FOR A DISTANCE OF 524.71' TO A POINT,

THENCE ALONG SAID RIGHT-OF-WAY S 59°39'21" W FOR A DISTANCE OF 563.93' TO A POINT, THENCE ALONG SAID RIGHT-OF-WAY S 60°05'14" W FOR A DISTANCE OF 719.28' TO A CONCRETE MONUENT FOUND AT THE INTERSECTION OF THE SOUTHEASTERN CORNER OF PARCEL 3 AND THE RIGHT-OF-WAY OF JOHNSON DRIVE WITH GA STATE PLANE EAST ZONE COORDINATES OF N. 997,746.89 AND E. 670,204.33,

THENCE FROM SAID POINT ALONG THE EASTERN BOUNDARY OF PARCEL 3 N 18°01'49" W FOR A DISTANCE OF 547.52' TO A POINT,

THENCE FROM SAID POINT ALONG A SURVEY TIE LINE S 71°58'22" W FOR A DISTANCE OF 348.86' TO A POINT ON THE SOUTHEASTEN MOST CORNER OF THE BUILDING, WITH GA STATE PLANE EAST ZONE COORDINATES OF N. 998,159.57 AND E. 669,703.15, ALSO KNOWN AS THE POINT OF BEGINNING;

THENCE FROM SAID POINT S 72°59'45" W FOR A DISTANCE OF 20.49' TO A POINT, THENCE FROM SAID POINT N 16°39'33" W FOR A DISTANCE OF 11.55' TO A POINT, THENCE FROM SAID POINT N 65°03'40" W FOR A DISTANCE OF 1.98' TO A POINT, THENCE FROM SAID POINT N 17°04'39" W FOR A DISTANCE OF 4.15' TO A POINT, THENCE FROM SAID POINT S 72°55'21" W FOR A DISTANCE OF 9.46' TO A POINT, THENCE FROM SAID POINT N 17°04'39" W FOR A DISTANCE OF 1.56' TO A POINT, THENCE FROM SAID POINT S 72°55'21" W FOR A DISTANCE OF 9.35' TO A POINT, THENCE FROM SAID POINT N 17°04'39" W FOR A DISTANCE OF 15.73' TO A POINT, THENCE FROM SAID POINT N 73°07'09" E FOR A DISTANCE OF 4.83' TO A POINT, THENCE FROM SAID POINT N 16°52'51" W FOR A DISTANCE OF 26.05' TO A POINT, THENCE FROM SAID POINT N 72°57'10" E FOR A DISTANCE OF 19.76' TO A POINT, THENCE FROM SAID POINT S 75°56'16" E FOR A DISTANCE OF 5.10' TO A POINT, THENCE FROM SAID POINT N 28°22'58" E FOR A DISTANCE OF 9.95' TO A POINT, THENCE FROM SAID POINT N 72°57'13" E FOR A DISTANCE OF 8.15' TO A POINT, THENCE FROM SAID POINT S 63°20'27" E FOR A DISTANCE OF 7.99' TO A POINT, THENCE FROM SAID POINT S 18°38'41" E FOR A DISTANCE OF 8.00' TO A POINT, THENCE FROM SAID POINT S 28°00'20" W FOR A DISTANCE OF 8.17' TO A POINT, THENCE FROM SAID POINT S 72°39'50" W FOR A DISTANCE OF 3.73' TO A POINT, THENCE FROM SAID POINT S 17°00'15" E FOR A DISTANCE OF 14.53' TO A POINT, THENCE FROM SAID POINT N 72°59'45" E FOR A DISTANCE OF 2.10' TO A POINT, THENCE FROM SAID POINT S 16°39'18" E FOR A DISTANCE OF 6.33' TO A POINT, THENCE FROM SAID POINT N 73°00'06" E FOR A DISTANCE OF 5.97' TO A POINT, THENCE FROM SAID POINT S 17°00'15" E FOR A DISTANCE OF 10.12' TO A POINT, THENCE FROM SAID POINT S 72°59'45" W FOR A DISTANCE OF 8.07' TO A POINT, THENCE FROM SAID POINT S 17°00'15" E FOR A DISTANCE OF 14.45' TO A POINT, ALSO KNOWN AS THE POINT OF BEGINNING.

SAID DESCRIBED AREA BEING 2,244 SQUARE FEET MORE OR LESS.

34th G.M.D., SCREVEN COUNTY, GEORGIA

JOB NO: GA07022A

JOHNSON DRIVE PARCEL 3

LEGAL DESCRIPTION PARCEL 3

ALL THAT PIECE, PARCEL OR TRACT OF LAND LOCATED IN THE 34^{th} G.M. DISTRICT OF SCREVEN COUNTY, GA AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT AT THE SOUTHWESTERN INTERSECTION OF PEEPLES FARM ROAD AND JOHNSON DRIVE WITH GA STATE PLANE EAST ZONE COORDINATES OF N. 998,658.00 AND E. 671,765.85,

ALSO KNOWN AS THE POINT OF COMMENCING:

THENCE FROM SAID POINT ALONG THE NORTHERN RIGHT-OF-WAY OF JOHNSON DRIVE S 59° 20'44" W FOR A DISTANCE OF 524.71' TO A POINT,

THENCE ALONG SAID RIGHT-OF-WAY S 59° 39'21" W FOR A DISTANCE OF 563.93' TO A POINT,

THENCE ALONG SAID RIGHT-OF-WAY S 60° 05'14" W FOR A DISTANCE OF 719.28' TO A CONCRETE MONUENT FOUND WITH GA STATE PLANE EAST ZONE COORDINATES OF N. 997,746.89 AND E. 670,204.33,

ALSO KNOWN AS THE POINT OF BEGINNING:

MONUMENT FOUND.

THENCE FROM SAID POINT ALONG THE NORTHERN RIGHT-OF-WAY OF JOHNSON DRIVE S 59° 31'17" W FOR A DISTANCE OF 348.43' TO AN IRON OLD REBAR FOUND, THENCE FROM SAID POINT ALONG THE NORTHERN RIGHT-OF-WAY OF JOHNSON DRIVE S 59° 24'38" W FOR A DISTANCE OF 102.24' TO AN IRON OLD REBAR FOUND, THENCE FROM SAID POINT ALONG THE NORTHERN RIGHT-OF-WAY OF JOHNSON DRIVE S 59° 26'26" W FOR A DISTANCE OF 288.95' TO AN IRON OLD REBAR FOUND, THENCE FROM SAID POINT N 22° 39'21" W FOR A DISTANCE OF 816.61' TO A CONCRETE

THENCE FROM SAID POINT N 69° 36'18" E FOR A DISTANCE OF 64.99' TO A CONCRETE MONUMENT FOUND,

THENCE FROM SAID POINT N 04° 00'38" E FOR A DISTANCE OF 161.46' TO A CONCRETE MONUMENT FOUND.

THENCE FROM SAID POINT S 66° 43'30" E FOR A DISTANCE OF 63.47' TO AN AXLE FOUND, THENCE FROM SAID POINT N 71° 43'57" E FOR A DISTANCE OF 614.77' TO A CONCRETE MONUMENT FOUND.

THENCE FROM SAID POINT S 18" 01'49" E FOR A DISTANCE OF 766.97' TO A CONCRETE MONUMENT FOUND,

ALSO KNOWN AS THE POINT OF BEGINNING.

SAID PARCEL 3 HAVING AN AREA OF 14.61 ACRES MORE OR LESS.

17 Sharthagfon Driva, Shilla C, Haffman, SC 28910 Sc Telephona: (494) 815–3306 FAX (484) 815–3306 CA Telephona: (912) 826–2776 Green' O Princess conductor MAC

SURVEYING CONSULTANTS

SHEET 1 OF 2

SCALE: 1"=200" DATE: 03/31/2011 JOB NO: GA07022A

34th G.M.D., SCREVEN COUNTY, GEORGIA

JOHNSON DRIVE PARCEL 3

PREPARED FOR: ENVIRONMENTAL RESOURCES MANAGEMENT GRAPHIC SCALE ADDRESS: #435 JOHNSON DRIVE





RETERONCE PLAT: 1) PROPRITY SURVEY FOR HENRY F. MAENIOFTER, JR., BONNE N. MAERIOFTER 1) TOWN MANARY 29, 2002 BY: MARREN E. POTTHRESS GA. R.L.S. NO. 1953

ILEGNO.

N/F - ROWLOW OR FORWERLY

R/M - ROWLOFF WAY

AL - ACRES

COMC, O - CONCRETE WANJURYT, CLD (TOUND)

(8C-14) - BRASS CAP (SET BY ERW)

NAILET - CONCRETE MARKER (SET BY ERW) VICINITY MAP PARCEL 1 N. 998,124,86 CE 869,252.69 (FOR MAPPING PURPOSES ONLY) PARCEL 2 PARCEL 3 JOHNSON DRIVE PARCEL 4 ASBUILT SURVEY OF EXISTING RESIDENCE WITH LOCATION OF ENVIRONMENTAL MARKERS WITHIN

PEEPLES FARM ROAD

APPENDIX B
PROPERTY OWNER CERTIFICATION

PROPERTY OWNER 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 that 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 and 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.

Authorized Signature

APPENDIX C ANNUAL PROPERTY EVALUATION AND COMPLIANCE FORM

ANNUAL TYPE 5 OPERTY EVALUATION AND COMPLIANCE FORM SMITH WRECKING SERVICE SITE, HSI# 10209 435 JOHNSON DRIVE, SYLVANIA, GEORGIA, TAX PARCEL 082-014A

TYPE	No.	CRITERIA RESPONSE	YES	NO
Engineering Control Component Inspected ¹	1	Any evidence of damage to the components of the engineering controls? If yes, please attach written explanation and steps taken to complete repair.		
Enclosed Porches	1a			
Wooden Decking	1b			
Markers-Marble and Brass	1c		7,	
Other (i.e. foundation integrity)	1d			
Disturbance by qualified personnel.	2	Was Type 5 Area disturbed by qualified personnel? If yes, please attach details.		
Property Instruments	3	Do all leases or other property instruments for the site have the applicable deed notice language inserted into them?		
	3a	If no to 2, provide a written explanation (attached) to EPD.		
Inspection	4	Date of inspection:		
	4a	Name of inspector:		
	4b	Details of inspection (attached):	*** //* //* //* //* //* //* //* //* //*	
	4c	Photographs showing current land use (attached)		
	4d	Weather Conditions/ Temperature (°F):		

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 fine and imprisonment for knowing violations.

NAME (Please type or print)	TITLE
SIGNATURE	DATE

¹ Disturbance, removal, or destruction of any component of the Type 5 remedy will constitute major damage to the Type 5 Area and must be addressed in accordance with Section 9 of the Maintenance Plan for Type 5 Area, Smith Wrecking Service Site.