



October 24, 2017

Ms. Antonia Beavers
Environmental Engineer
Georgia Environmental Protection Division- Response and Remediation Program
Georgia Department of Natural Resources
2 Martin Luther King Drive, S.E. Suite 1054 East
Atlanta, Georgia 30334

Re: Voluntary Remediation Program Application-Commercial Metals Company
Former Loef Site-590 Old Hull Road, Athens, Georgia- HSI Site No 10376
VRP Site No 802705980

Dear Ms. Beavers,

Commercial Metals Company (CMC) is pleased to submit a new VRP application for the above-captioned site. The application was completed by Apex Companies, LLC (Apex) on behalf of CMC.

The VRP site is comprised of three parcels. CMC initially purchased two of the parcels in March of 2017. The third parcel was inadvertently omitted from the acquisition. The additional parcel was purchased on September 7, 2017 by CMC.

As CMC intends to continue corrective actions at the site, the recently submitted 6th semi-annual progress report contained a request for an extension of the project completion schedule. The progress report also included an anticipated milestone schedule and an update to the Conceptual Site Model.

Thank you for your assistance with the project and in reviewing this application. If you have any questions regarding this submittal or require any additional information, please contact me at 803-724-3463.

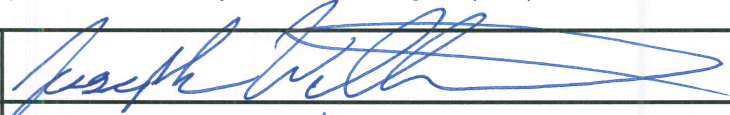
Sincerely,

A handwritten signature in blue ink, appearing to read "Joe F. Williams", is written over a horizontal line.

Joseph F. Williams
Environmental Manager, Southeast

Enclosure

Voluntary Investigation and Remediation Plan Application Form and Checklist

VRP APPLICANT INFORMATION					
COMPANY NAME	Commercial Metals Company				
CONTACT PERSON/TITLE	Joe Williams / Environmental Manager, Southeast Region				
ADDRESS	310 New State Road, Cayce, South Carolina 29033				
PHONE	803.724.3463	FAX	803.936.3743	E-MAIL	josephf.williams@cmc.com
GEORGIA CERTIFIED PROFESSIONAL GEOLOGIST OR PROFESSIONAL ENGINEER OVERSEEING CLEANUP					
NAME	Kathleen Roush, P.G.		GA PE/PG NUMBER	1799	
COMPANY	Apex Companies, LLC				
ADDRESS	10610 Metromont Parkway, Suite 206, Charlotte, NC 28269				
PHONE	704.799.6390	FAX	704.799.6395	E-MAIL	kroush@apexcos.com
APPLICANT'S CERTIFICATION					
<p>In order to be considered a qualifying property for the VRP:</p> <p>(1) The property must have a release of regulated substances into the environment;</p> <p>(2) The property shall not be:</p> <p style="margin-left: 20px;">(A) Listed on the federal National Priorities List pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. Section 9601.</p> <p style="margin-left: 20px;">(B) Currently undergoing response activities required by an order of the regional administrator of the federal Environmental Protection Agency; or</p> <p style="margin-left: 20px;">(C) A facility required to have a permit under Code Section 12-8-66.</p> <p>(3) Qualifying the property under this part would not violate the terms and conditions under which the division operates and administers remedial programs by delegation or similar authorization from the United States Environmental Protection Agency.</p> <p>(4) Any lien filed under subsection (e) of Code Section 12-8-96 or subsection (b) of Code Section 12-13-12 against the property shall be satisfied or settled and released by the director pursuant to Code Section 12-8-94 or Code Section 12-13-6.</p> <p>In order to be considered a participant under the VRP:</p> <p style="margin-left: 20px;">(1) The participant must be the property owner of the voluntary remediation property or have express permission to enter another's property to perform corrective action.</p> <p style="margin-left: 20px;">(2) The participant must not be in violation of any order, judgment, statute, rule, or regulation subject to the enforcement authority of the director.</p> <p>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.</p> <p>I also certify that this property is eligible for the Voluntary Remediation Program (VRP) as defined in Code Section 12-8-105 and I am eligible as a participant as defined in Code Section 12-8-106.</p>					
APPLICANT'S SIGNATURE					
APPLICANT'S NAME/TITLE (PRINT)	Joseph Williams / Environmental Manager - Southeast			DATE	10/24/17

QUALIFYING PROPERTY INFORMATION (For additional qualifying properties, please refer to the last page of application form)			
HAZARDOUS SITE INVENTORY INFORMATION (if applicable)			
HSI Number	10376	Date HSI Site listed	June 9, 1995
HSI Facility Name	The Loef Company, Inc.	NAICS CODE	423930
PROPERTY INFORMATION			
TAX PARCEL ID	221 002C; 221 001; & 162 037	PROPERTY SIZE (ACRES)	21.34 Acres (total)
PROPERTY ADDRESS	610 Old Hull Road; 590 Old Hull Road; and 305 Athena Dr.		
CITY	Athens	COUNTY	Clarke
STATE	Georgia	ZIPCODE	30601
LATITUDE (decimal format)	33.982764	LONGITUDE (decimal format)	83.342111
PROPERTY OWNER INFORMATION			
PROPERTY OWNER(S)	Owen Electric Steel Company of South Carolina	PHONE #	803.936.3700
MAILING ADDRESS	6565 North MacArthur Blvd		
CITY	Irving	STATE/ZIPCODE	Texas 75039
ITEM #	DESCRIPTION OF REQUIREMENT	Location in VRP (i.e. pg., Table #, Figure #, etc.)	For EPD Comment Only (Leave Blank)
1.	\$5,000 APPLICATION FEE IN THE FORM OF A CHECK PAYABLE TO THE GEORGIA DEPARTMENT OF NATURAL RESOURCES. (PLEASE LIST CHECK DATE AND CHECK NUMBER IN COLUMN TITLED "LOCATION IN VRP." PLEASE DO NOT INCLUDE A SCANNED COPY OF CHECK IN ELECTRONIC COPY OF APPLICATION.)	NA (waived) – Fee was paid by original applicant in 2012	
2.	WARRANTY DEED(S) FOR QUALIFYING PROPERTY.	See Attachment A	
3.	TAX PLAT OR OTHER FIGURE INCLUDING QUALIFYING PROPERTY BOUNDARIES, ABUTTING PROPERTIES, AND TAX PARCEL IDENTIFICATION NUMBER(S).	Updated-See Attachment B	
4.	ONE (1) PAPER COPY AND TWO (2) COMPACT DISC (CD) COPIES OF THE VOLUNTARY REMEDIATION PLAN IN A SEARCHABLE PORTABLE DOCUMENT FORMAT (PDF).	In 3 rd Semi-Annual Progress Report. The previous applicant's remediation plan will be followed.	
5.	The VRP participant's initial plan and application must include, using all reasonably available current information to the extent known at the time of application, a graphic three-dimensional preliminary conceptual site model (CSM) including a preliminary remediation plan with a table of delineation standards, brief supporting text, charts, and figures (no more than 10 pages, total) that illustrates the site's surface and subsurface setting, the known or suspected source(s) of contamination, how contamination might move within the environment, the potential human health and ecological receptors, and the complete or incomplete exposure pathways that may exist at the site; the preliminary CSM must be updated as the investigation and remediation progresses and an up-to-date CSM must be included in each semi-annual status report submitted to the director by the participant; a PROJECTED MILESTONE SCHEDULE for investigation and remediation of the site, and	Milestone schedules and CSM updated in prior Progress Reports. The 6th Semi-Annual Progress Report (Section 6.1) included updated schedule by new applicant. See Attachment C for more details.	

	<p>after enrollment as a participant, must update the schedule in each semi-annual status report to the director describing implementation of the plan during the preceding period. A Gantt chart format is preferred for the milestone schedule.</p> <p>The following four (4) generic milestones are required in all initial plans with the results reported in the participant's next applicable semi-annual reports to the director. The director may extend the time for or waive these or other milestones in the participant's plan where the director determines, based on a showing by the participant, that a longer time period is reasonably necessary:</p>		
5.a.	Within the first 12 months after enrollment, the participant must complete horizontal delineation of the release and associated constituents of concern on property where access is available at the time of enrollment;	Completed by original applicants (Hull 11/2011 & OmniSource 03/15)	
5.b.	Within the first 24 months after enrollment, the participant must complete horizontal delineation of the release and associated constituents of concern extending onto property for which access was not available at the time of enrollment;	Partially completed by prior VRP applicants. See 6 th Progress Report for work plan and schedule.	
5.c.	Within 30 months after enrollment, the participant must update the site CSM to include vertical delineation, finalize the remediation plan and provide a preliminary cost estimate for implementation of remediation and associated continuing actions; and	Completed and updated by prior applicants.	
5.d.	Within 60 months after enrollment, the participant must submit the compliance status report required under the VRP, including the requisite certifications.	Ongoing. Extension requested in 6 th Progress Report.	
6.	<p>SIGNED AND SEALED PE/PG CERTIFICATION AND SUPPORTING DOCUMENTATION:</p> <p>"I certify under penalty of law that this report and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, et seq.). I am a professional engineer/professional geologist who is registered with the Georgia State Board of Registration for Professional Engineers and Land Surveyors/Georgia State Board of Registration for Professional Geologists and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances.</p> <p>Furthermore, to document my direct oversight of the Voluntary Remediation Plan development, implementation of corrective action, and long term monitoring, I have attached a monthly summary of hours invoiced and description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division.</p> <p>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."</p> <p><u>Kathleen Roush</u> Printed Name and GA PE/PG Number</p> <p><u>Kathleen Roush</u> Signature and Stamp</p> <p><u>10-25-17</u> Date</p>		

ADDITIONAL QUALIFYING PROPERTIES (COPY THIS PAGE AS NEEDED)

PROPERTY INFORMATION			
TAX PARCEL ID	221 002C	PROPERTY SIZE (ACRES)	1.63 Acres
PROPERTY ADDRESS	610 Old Hull Road		
CITY	Athens	COUNTY	Clarke
STATE	Georgia	ZIPCODE	30601
LATITUDE (decimal format)	33.984069	LONGITUDE (decimal format)	83.341436
PROPERTY OWNER INFORMATION			
PROPERTY OWNER(S)	Owen Electric Steel Company of South Carolina	PHONE #	803.936.3700
MAILING ADDRESS	6565 North MacArthur Blvd.		
CITY	Irving	STATE/ZIPCODE	Texas 75039

PROPERTY INFORMATION			
TAX PARCEL ID	221 001	PROPERTY SIZE (ACRES)	15 Acres
PROPERTY ADDRESS	590 Old Hull Road		
CITY	Athens	COUNTY	Clarke
STATE	Georgia	ZIPCODE	30601
LATITUDE (decimal format)	33.981769	LONGITUDE (decimal format)	83.342617
PROPERTY OWNER INFORMATION			
PROPERTY OWNER(S)	Owen Electric Steel Company of South Carolina	PHONE #	803.936.3700
MAILING ADDRESS	6565 North MacArthur Blvd.		
CITY	Irving	STATE/ZIPCODE	Texas 75039

PROPERTY INFORMATION			
TAX PARCEL ID	162 037	PROPERTY SIZE (ACRES)	4.71 Acres
PROPERTY ADDRESS	305 Athena Drive		
CITY	Athens	COUNTY	Clarke
STATE	Georgia	ZIPCODE	30601
LATITUDE (decimal format)	33.980097	LONGITUDE (decimal format)	83.343344
PROPERTY OWNER INFORMATION			
PROPERTY OWNER(S)	Owen Electric Steel Company of South Carolina	PHONE #	803.936.3700
MAILING ADDRESS	6565 North MacArthur Blvd.		
CITY	Irving	STATE/ZIPCODE	Texas 75039

**VRP Voluntary Investigation and Remediation Plan
Application Form and Checklist
HSI Number 10376**

ATTACHMENT A

Warranty Deeds

-----Space Above Reserved for Recording Use-----

After Recording, Return to:

STATE OF GEORGIA

COUNTY OF ATHENS-CLARKE

CORRECTIVE LIMITED WARRANTY DEED

THIS INDENTURE is made as of the 7th day of September, 2017, by and between **OMNISOURCE ATHENS DIVISION, LLC, an Indiana limited liability company, successor by merger to RH Realty, LLC, a Georgia limited liability company**, as party of the first part, hereinafter referred to as "Grantor," and **OWEN ELECTRIC STEEL COMPANY OF SOUTH CAROLINA, a South Carolina corporation**, as party of the second part, hereinafter referred to as "Grantee," the words "Grantor" and "Grantee" to include the neuter, masculine and feminine genders, the singular and the plural.

W I T N E S S E T H:

FOR AND IN CONSIDERATION of the sum of Ten Dollars (\$10.00) in hand paid and other good and valuable consideration delivered to Grantor by Grantee at and before the execution, sealing and delivery hereof, the receipt and sufficiency of which are hereby acknowledged, Grantor has and hereby does grant, bargain, sell and convey unto Grantee and the successors and assigns of Grantee all of Grantor's right, title and interest in that tract or parcel of land lying and being more particularly described on Exhibit A attached hereto and incorporated by this reference (the "Property"). This conveyance is made subject to the matters set forth on Exhibit B, attached hereto and incorporated herein by this reference, to the extent such matters

are now in force, valid, and affect the title of the Property (but references to the same shall not operate to re-impose same) (the "Permitted Exceptions").

TO HAVE AND TO HOLD the Property, together with any and all of the rights, members and appurtenances thereof, to the same being, belonging or in anywise appertaining to, the only proper use, benefit and behoof of the Grantee and the successors and assigns of Grantee forever IN FEE SIMPLE.

TOGETHER WITH: (i) all buildings and improvements located on the Property, (ii) all fixtures affixed to all such buildings and improvements (including, without limitation, all plumbing, electrical and HVAC systems therein), (iii) all easements, rights of way, privileges, licenses, hereditaments, appurtenances and all other rights and benefits appurtenant or in any way related to, and/or demised under any lease of or other context or agreement for the use of the Property, and (iv) all strips and gores and any land lying in the bed of a public road, highway or other access way, open or proposed adjoining the Property.

GRANTOR SHALL WARRANT and forever defend the right and title to the Property, subject to the Permitted Exceptions, unto the Grantee and the successors and assigns of Grantee against the claims of all persons claiming by, through or under Grantor but not otherwise.

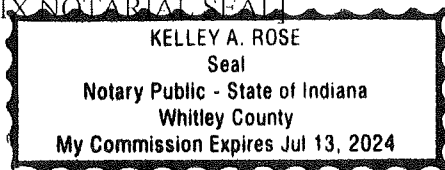
This deed is being recorded in order to include Parcel "C", legally described in Exhibit A which was inadvertently omitted from a Limited Warranty Deed recorded on March 10, 2017 in the Athens-Clarke County Recorder's Office at Book 4563, Page 302. There is no monetary consideration being exchanged for the corrective deed. All consideration for the conveyance of Parcel "C" was previously exchanged by Grantee to Grantor in connection with the original conveyance that inadvertently failed to include Parcel "C".

IN WITNESS WHEREOF, Grantor has caused this deed to be executed and sealed as of the day and year first above written.

Signed, seal and delivered
in the presence of:

[Signature]
Unofficial Witness

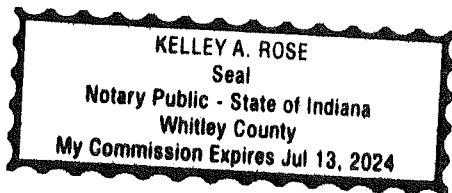
Kelley A. Rose
Notary Public
My Commission Expires: 7/13/24
[AFFIX NOTARIAL SEAL]



Signed, seal and delivered
in the presence of:

[Signature]
Unofficial Witness

Kelley A. Rose
Notary Public
My Commission Expires: 7/13/24
[AFFIX NOTARIAL SEAL]



GRANTOR:

OMNISOURCE ATHENS DIVISION, LLC
an Indiana limited liability company

By: OmniSource, LLC (formerly known as
OmniSource Corporation), its Sole Member

By: [Signature] (SEAL)

Name: Russell B. Rinn

Title: President

GRANTOR:

OMNISOURCE ATHENS DIVISION, LLC
an Indiana limited liability company

By: OmniSource, LLC (formerly known as
OmniSource Corporation), its Sole Member

By: [Signature] (SEAL)

Name: Richard A. Poinatte

Title: Vice President

Exhibit A

Legal Description

PARCEL A:

ALL THAT TRACT OR PARCEL OF LAND SITUATE, LYING AND BEING IN ATHENS-CLARKE COUNTY, GEORGIA, CONTAINING 15.63 ACRES, MORE OR LESS, LYING ON THE SOUTHEASTERLY SIDE OF THE OLD HULL ROAD BOUNDED ON THE NORTH BY SAID OLD HULL ROAD; ON THE EAST BY LANDS CONVEYED BY GEORGE F. STROTHER, JR. AND ELIZABETH STROTHER HAWKINS TO ATHENA, INC., ON MAY 31, 1963; ON THE SOUTH BY SAID LANDS TO ATHENA, INC., THE SOUTH LINE BEING THE CENTERLINE OF THE SEABOARD AIR LINE RAILROAD RIGHT OF WAY; AND ON THE WEST BY THE FORMER CORNER LANDS OF ATHENS, INC. SAID 15.63 ACRES ARE MORE PARTICULARLY DESCRIBED AS BEGINNING AT ITS NORTHEAST CORNER ON THE CENTERLINE OF SAID RAILROAD RIGHT OF WAY AT THE CORNER WITH THE LANDS CONVEYED BY GEORGE F. STROTHER, JR., AND ELIZABETH STROTHER HAWKINS TO ATHENS, INC., THE DEED OF CONVEYANCE BEING RECORDED IN DEED BOOK 218, PAGE 348, IN THE OFFICE OF THE CLERK OF THE SUPERIOR COURT OF ATHENS-CLARKE COUNTY, GEORGIA, AND FROM SAID BEGINNING POINT RUNNING NORTH 68 DEGREES 41 MINUTES WEST 516.3 FEET ALONG LINE OF ATHENA, INC., TO AN IRON PIN ON THE SOUTHEAST SIDE OF SAID OLD HULL ROAD; RUNNING THENCE SOUTH 29 DEGREES 42 MINUTES WEST 1,182.7 FEET ALONG SAID OLD HULL ROAD TO AN IRON PIN AT THE CORNER OF SAID CORNER LANDS OF ATHENS, INC.; RUNNING THENCE SOUTH 55 DEGREES 47 MINUTES EAST 686 FEET ALONG THE LINE OF SAID CORNER LANDS TO THE CENTERLINE OF SAID SEABOARD AIR LINE RAILROAD RIGHT OF WAY; THENCE NORTH 22 DEGREES 11 MINUTES EAST 1315 FEET, MORE OR LESS, ALONG SAID CENTERLINE TO THE POINT OF BEGINNING.

PARCEL B:

ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN THE 220TH DISTRICT, G.M., ATHENS-CLARKE COUNTY, GEORGIA, CONTAINING 1.333 ACRES, MORE OR LESS, AND BEING SHOWN AND DESIGNATED AS TRACT 7 ACCORDING TO A PLAT PREPARED BY BEN MCLEROY & ASSOCIATES, DATED DECEMBER 13, 1972, AS LAST REVISED MAY 16, 1977, ENTITLED "ATHENA INDUSTRIAL PARK", SAID PLAT BEING RECORDED IN PLAT BOOK 16, PAGE 153, IN THE OFFICE OF THE CLERK OF THE SUPERIOR COURT OF ATHENS-CLARKE COUNTY, GEORGIA, TO WHICH PLAT REFERENCE IS HEREBY SPECIFICALLY MADE FOR A MORE DETAILED DESCRIPTION. THIS BEING A PORTION OF THE PROPERTY CONVEYED FROM LANE LIMITED, A NEW YORK CORPORATION, TO STONE MOUNTAIN INDUSTRIAL PARK, INC., A GEORGIA CORPORATION, BY WARRANTY DEED DATED MAY 3, 1983, RECORDED IN DEED BOOK 436, PAGE 593, ATHENS-CLARKE COUNTY, GEORGIA RECORDS.

TOGETHER WITH ALL THAT TRACT OR PARCEL OF LAND, TOGETHER WITH ALL IMPROVEMENTS THEREON, SITUATE, LYING AND BEING IN ATHENS-CLARKE COUNTY, GEORGIA, AND BEING THE SOUTHWESTERLY ONE-HALF OF THAT CERTAIN STREET HAVING A 60' RIGHT OF WAY KNOWN AS CALHOUN DRIVE AS SHOWN ON THAT CERTAIN PLAT OF SURVEY ENTITLED "PLAT OF BINKLEY CONST. CO. PROPERTY" PREPARED BY J.R. HOLLAND, REGISTERED SURVEYOR, DATED OCTOBER 10, 1964. THE SAID PROPERTY KNOWN AS CALHOUN DRIVE COMMENCING ON THE EASTERLY SIDE OF OLD HULL ROAD AND RUNNING THENCE IN A SOUTHEASTERLY DIRECTION APPROXIMATELY 425 FEET TO THE WESTERLY RIGHT OF WAY OF SEABOARD COAST LINE RAILROAD.

PARCEL C:

ALL THAT TRACT OR PARCEL OF LAND, SITUATE, LYING AND BEING IN THE 219TH AND 220TH DISTRICTS, G.M., ATHENS-CLARKE COUNTY, GEORGIA, CONTAINING 4.706 ACRES, MORE OR LESS, AND BEING MORE PARTICULARLY SHOWN AND DESIGNATED AS TRACT 6, ATHENA INDUSTRIAL PARK, ON THAT CERTAIN PLAT ENTITLED "ATHENA INDUSTRIAL PARK", PREPARED BY BEN MCLEROY & ASSOCIATES, DATED DECEMBER 13, 1972, LAST REVISED MAY 16, 1977, AND RECORDED IN PLAT BOOK 16, PAGE 153, IN THE OFFICE OF THE CLERK OF THE SUPERIOR COURT OF ATHENS-CLARKE COUNTY, GEORGIA, REFERENCE TO WHICH IS HEREBY MADE FOR A MORE DETAILED DESCRIPTION OF THE PROPERTY HEREIN CONVEYED.

Exhibit B

Permitted Exceptions

1. This item has been intentionally deleted.
2. This item has been intentionally deleted.
3. This item has been intentionally deleted.

4. This item has been intentionally deleted.
5. This item has been intentionally deleted.
6. Taxes and assessments for the year 2017 and subsequent years, a lien not yet due and payable.
7. This item has been intentionally deleted.
8. This item has been intentionally deleted.
9. No insurance is afforded as to the acreage or square footage contained in the insured property.
10. This item has been intentionally deleted.
11. This item has been intentionally deleted.
12. This item has been intentionally deleted.
13. This item has been intentionally deleted.
14. This item has been intentionally deleted.
15. This item has been intentionally deleted.
16. Railroad right of Way from Rosa D. Hull to Georgia Carolina and Southern Railway Company, dated June 30 1890, and recorded in Deed Book HH, Page 735, aforesaid records.
17. Easement from Geo F. Strother and T. R. Barber to Georgia Power Company dated June 19, 1946, filed for record August 19, 1946, and recorded in Deed Book 99, Page 92, aforesaid records.
18. Easement from Geo F. Strother and T. R. Barber to Georgia Power Company dated June 19, 1946, filed for record August 19, 1946, and recorded in Deed Book 99, Page 93, aforesaid records.

19. Easement from Geo F. Strother to Georgia Power Company Corporation dated January 20, 1947, filed for record July 18, 1947, and recorded in Deed Book 105, Page 138, aforesaid records.
 20. Easement from C. A. Evans to Georgia Power Company dated May 25, 1964, filed for record June 10, 1964, and recorded in Deed Book 232, Page 334, aforesaid records.
 21. Easement from Athena, Inc. to Georgia Power Company dated May 12, 1966, filed May 27, 1966, and recorded in Deed Book 265, Page 76, aforesaid records.
-
22. Right of Way Easement from Athena, Inc., a corporation of Clarke County, Georgia to Seaboard Air Line Railroad Company, a corporation duly created and existing pursuant to and by virtue of the laws of the Commonwealth of Virginia, dated May 24, 1966, filed for record June 29, 1966, and recorded in Deed Book 266, Page 412, aforesaid records.
 23. Right of Way Easement from Athena Corporation, a corporation organized and existing under the laws of the State of Georgia to Seaboard Coast Line Railroad Company, a corporation organized and existing under the laws of the Commonwealth of Virginia, dated March 1, 1968, filed for record May 28, 1968, and recorded in Deed Book 302, Page 401, aforesaid records.
 24. Easement from Athena, Inc., a corporation of Clarke County, Georgia to Atlanta Gas Light Company, a corporation of Fulton County, Georgia, dated September 4, 1968, filed for record September 5, 1968, and recorded in Deed Book 308, Page 438, aforesaid records and as approximately shown on the Survey.
 25. Right-of-Way Deed from Preferred Land Corporation, a Georgia corporation to Georgia Power Company, a Georgia corporation, dated May 27, 1977, filed for record May 27, 1977, and recorded in Deed Book 400, Page 3, aforesaid records; and as corrected by that certain Corrective Right-of-Way Deed, dated June 7, 1977, filed for record June 19, 1977, and recorded in Deed Book 400, Page 365, aforesaid records.
 26. Notice of Environmental Hazard as indicated by Recorded Affidavit of Hull Real Estate LLC, filed for record April 16, 2016, and recorded in Deed Book 2183, Page 371, aforesaid records. (Note: See Hazardous Site Inventory Summary for site number 10376.)
 27. Matters as shown on that certain plat recorded in Plat Book 14, Page 78, aforesaid records and as approximately shown on the Survey.
 28. Matters as shown on that certain plat recorded in Plat Book 16, Page 153, aforesaid records and as approximately shown on the Survey.
 29. Title is subject to the rights of others, including but not limited to utilities, in that portion of Calhoun Drive Extension, as evidenced by Quit Claim Deed from The Unified Government of Athens-Clarke County, Georgia, to The Loef Company, Inc.

30. This item has been intentionally deleted.
31. Subject property abuts a railroad right of way and exception is taken as to any portion of subject property which lies within the right of way of said railroad.
32. This item has been intentionally deleted.
33. Any facts, rights, interests or claims that may exist or arise by reason of the following matters disclosed by the ALTA Land Title Survey prepared by Landco, LP, Job No. 17-7308, dated July 19, 2017 (the "Survey"):
 - (a) fence along eastern boundary line varies with property line up to 21.6'
 - (b) fence crosses northern boundary line up to 38.2'
 - (c) concrete crosses eastern boundary line up to 16.1'
 - (d) equipment crosses eastern boundary line up to 7.9'
 - (e) wall crosses eastern boundary line up to 12 feet
 - (f) curb crosses eastern boundary line up to 10.4'
 - (g) sign crosses western boundary line up to 2.4'
 - (h) fence along western boundary varies with property line up to 8 feet
 - (j) curb cuts encroach onto Old Hull Road
 - (k) railway tracts cross over property.

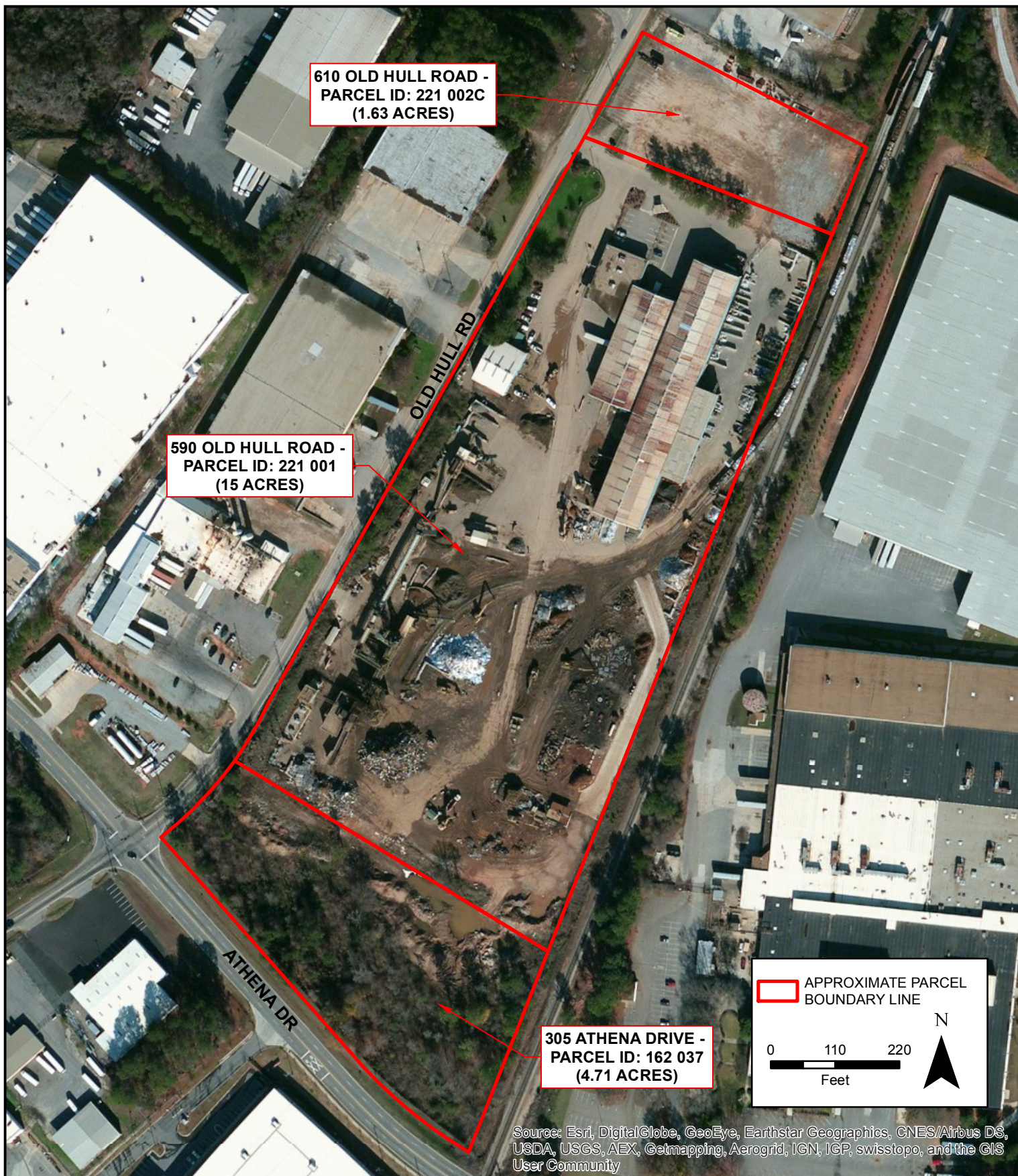
The following apply with respect to Parcel C only:

34. Easements as conveyed in Right-of-Way Deed from Athena, Incorporated to State Highway Department of Georgia dated August 30, 1968, filed for record September 6, 1968 and recorded in Deed Book 308, Page 464, aforesaid records.
35. Sewer Line Easement from Athena, Inc., a Georgia corporation to The Mayor and Council of the City of Athens, a municipal corporation of Clarke County, Georgia, dated September 22, 1972, filed for record September 24, 1972, and recorded in Deed Book 372, Page 752, aforesaid records.
36. Terms and provisions of that certain Declaration of Restrictive Covenants, by Stone Mountain Industrial Park, Inc., a Georgia corporation dated January 9, 1998, filed for record January 16, 1998, and recorded in Deed Book 1678, Page 488, aforesaid records.
37. Matters as shown on that certain plat recorded in Plat Book 36, Page 169, aforesaid records.

**VRP Voluntary Investigation and Remediation Plan
Application Form and Checklist
HSI Number 10376**

ATTACHMENT B

VRP Site Plan with Tax Parcel Identifications



CHECK BY: GW

DRAWN BY: SP

DATE: 10/19/17

SCALE: AS SHOWN

CAD NO.: 510507.001.02

PRJ NO.: 510507.001.02

VRP SITE PLAN WITH PARCEL IDENTIFICATIONS

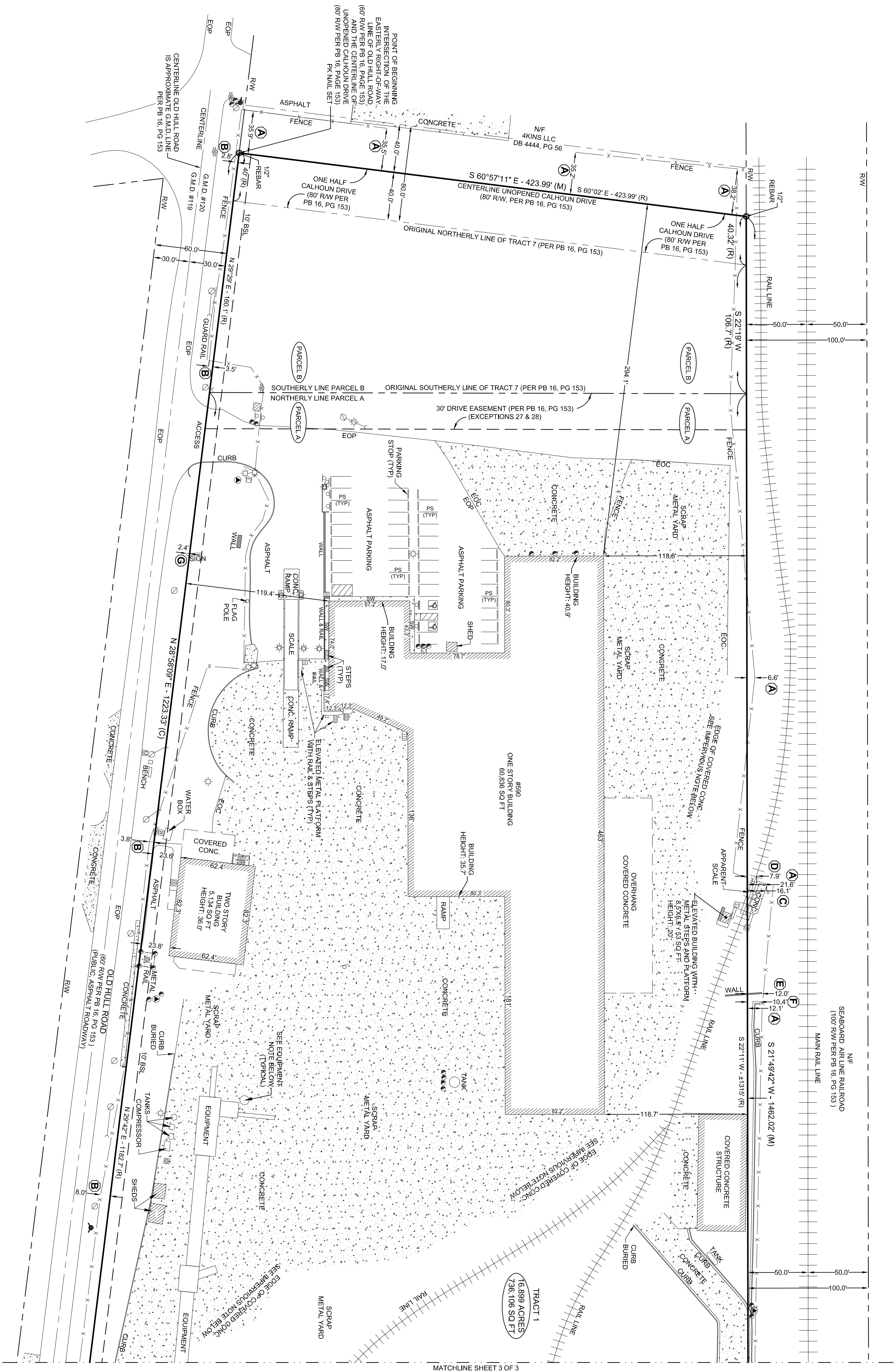
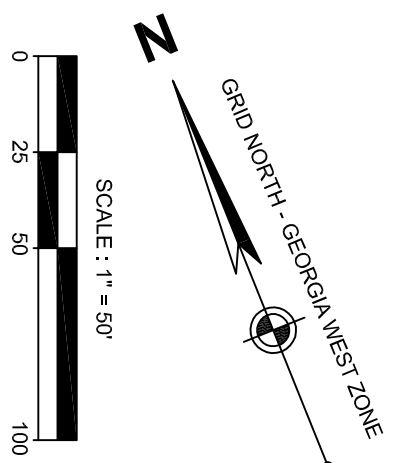
FORMER LOEF COMPANY PROPERTY
590 OLD HULL ROAD
ATHENS, GEORGIA



FIGURE

1

SURVEY PREPARED BY:
ON POINT SURVEYING & MAPPING, INC.
3451 HIGHWAY 124 WEST
JEFFERSON, GA 30549
PROJECT #16-124-01



EQUIPMENT NOTE:

ALL IMPROVEMENTS SHOWN HEREON LABELED "EQUIPMENT" ARE APPROXIMATE LOCATIONS AND SHOULD BE TREATED AS SO. "EQUIPMENT" LOCATIONS WERE OBTAINED USING REFLECTOR-LESS MEASUREMENTS. ACCESS TO THESE AREAS WERE PROHIBITED DUE TO HAZARDOUS CONDITIONS RUNNING EQUIPMENT, RUNNING HEAVY EQUIPMENT AND SCRAPE METAL PILES.

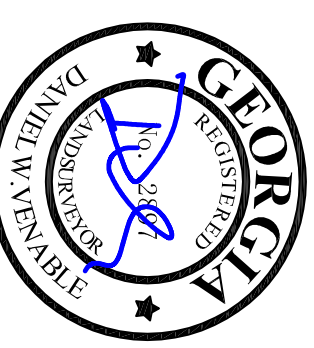
IMPERVIOUS NOTE:

ALL UNCOVERED AND UNBURIED IMPERVIOUS AREAS ON THIS SITE ARE SHOWN HEREON. AREAS LABELED "EDGE OF COVERED CONCRETE" SHOW THE POINT AT WHICH THE CONCRETE IS COVERED IN SCRAP METAL PILES AND/OR BURIED BENEATH DIRT. THERE MAY BE ADDITIONAL IMPERVIOUS AREAS ON THIS SITE THAT WERE UNOBTAINABLE AT THE TIME OF SURVEY DO TO HAZARDOUS CONDITIONS, RUNNING EQUIPMENT, HEAVY EQUIPMENT, AND SCRAP METAL PILES.

- [illegible]

STATEMENT OF ENCROACHMENTS

- A** FENCE CROSSES PROPERTY LINE (TYP)
- B** FENCE CROSSES RIGHT-OF-WAY LINE (TYP)
- C** CONCRETE CROSSES PROPERTY LINE (TYP)
- D** EQUIPMENT CROSSES PROPERTY LINE (TYP)
- E** WALL CROSSES PROPERTY LINE (TYP)
- F** CURB CROSSES PROPERTY LINE (TYP)
- G** SIGN CROSSES RIGHT-OF-WAY LINE



07/19/2014
FOR THE FIRM
ON POINT SURVEYING &
MAPPING, INC.
LSF #1249
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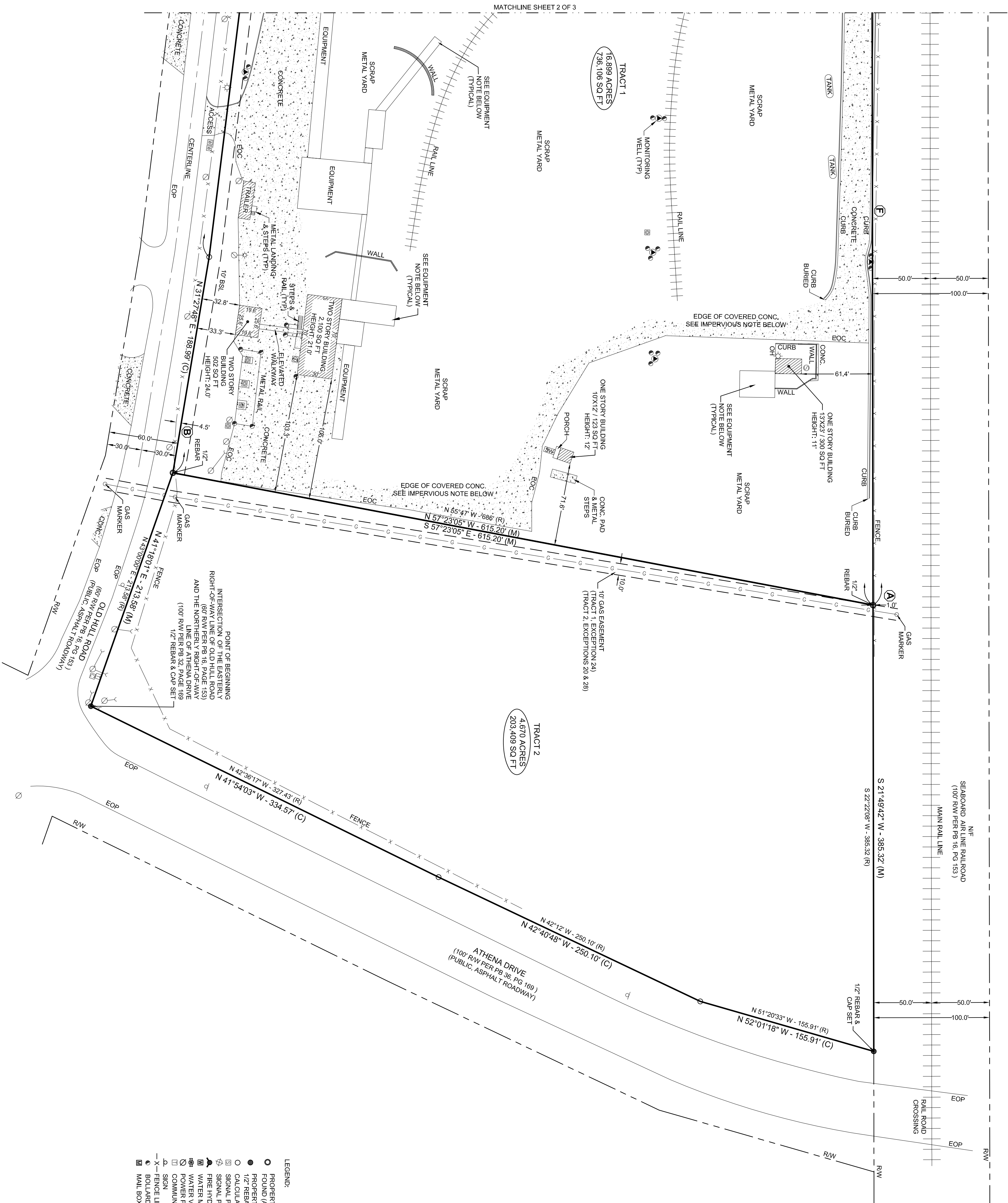
ALTA/NSPS LAND TITLE SURVEY OF

ADDRESS: 390 OLD HULL ROAD & 305 ALPHEA DRIVE SHEET 2 OF 3
 ATHENS, CLARKE COUNTY, GA 30601
 NAME: OMNISOURCE (OLD HULL)
 JOB NO.: 17-7308 DATE: 07/19/2017 SCALE: 1" = 50'
 REVISIONS:

NO.	DATE	DESCRIPTION



LANDCO, L.P.
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INFO@LANDCOSEVICES.COM
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EQUIPMENT NOTE:































APPROXIMATE LOCATIONS AND SHOULD BE TREATED AS SO. "EQUIPMENT" LOCATIONS WERE OBTAINED USING REFLECTOR-LESS MEASUREMENTS. ACCESS TO THESE AREAS WERE PROHIBITED DUE TO HAZARDOUS CONDITIONS. RUNNING EQUIPMENT, RUNNING HEAVY EQUIPMENT AND SCRAP METAL PILES.






















IMPERVIOUS NOTE

ALL UNCOVERED AND UNBURIED IMPERIOUS AREAS ON THIS SITE ARE SHOWN HEREON, AREAS LABELED "EDGE OF COVERED CONCRETE" SHOW THE POINT AT WHICH THE CONCRETE IS COVERED IN SCRAP METAL PILES AND/OR BURIED BENEATH DIRT. THERE MAY BE ADDITIONAL IMPERIOUS AREAS ON THIS SITE THAT WERE UNOBTAINABLE AT THE TIME OF SURVEY DUE TO HAZARDOUS CONDITIONS, RUNNING EQUIPMENT, HEAVY EQUIPMENT AND SCRAP METAL PILES.

STATEMENT OF ENCROACHMENTS

(A) FENCE CROSSES PROPERTY LINE (TYP)
(B) FENCE CROSSES RIGHT-OF-WAY LINE (TYP)
(C) CONCRETE CROSSES PROPERTY LINE (TYP)
(D) EQUIPMENT CROSSES PROPERTY LINE (TYP)
(E) WALL CROSSES PROPERTY LINE (TYP)
(F) CURB CROSSES PROPERTY LINE (TYP)
(G) SIGN CROSSES RIGHT-OF-WAY LINE

	PROPERTY CORNER		POWER METER
	FOUND (AS NOTED)		ELECTRIC BOX
	CORNER		A/C UNIT
	1/2 REBAR (S)		LIGHT FOOT
	CALCULATED POINT		GUY WIRE
	SIGNAL POLE		MANHOLE
	FIRE HYDRANT		CLEAN OUT
	WATER METER		CAMERA POLE
	WATER VALVE		MONITORING WELL
	POWER POLE		CABLE BOX
	COMMUNICATION BOX		DRAIN INLET
	SIGN		HEADWALL
	X - FENCE LINE		JUNCTION BOX
	BOLLARD		GAS METER
	MAIL BOX		POWER LINE POLE

	HANDICAP SYMBOL		
	PAINTED DIRECTIONAL ARROW		
	CP CONCRETE PAD		
	C CONCRETE		
	(TYP) TYPICAL		
	COVERED PATIO		
	PAVED DRIVEWAY		
	PAVED SIDEWALK		
	N/A NOT TO SCALE		
	MANEUVERING WALK		
	RECORD		
	LAND LOT		
	CATCH BASIN		
	DRAIN		
	EDGE OF CONCRETE		
	EDGE OF ASPHALT		
	EDGE OF CONCRETE CURB		
	EDGE OF ASPHALT CURB		
	EDGE OF CONCRETE CURB		
	EDGE OF ASPHALT CURB		
	G.A.D. GEORGIA MULTIDISTRICT		


ALTA/NSPS LAND TITLE SURVEY OF

ADDRESS: 590 OLD HULL ROAD & 305 ATHENA DRIVE SHEET 3 OF 3
ATHENS, CLARKE COUNTY, GA 30601

NAME: OMNISOURCE (OLD HULL)

REVISIONS	
NO.	DATE

JOB NO: 17-7308 DATE: 07/19/2017 SCALE: 1" = 50'


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**VRP Voluntary Investigation and Remediation Plan
Application Form and Checklist
HSI Number 10376**

ATTACHMENT C

Information for Application Checklist Items 4 and 5

Checklist Item 4 – VOLUNTARY INVESTIGATION AND REMEDIATION PLAN

Commercial Metals Company (CMC) is petitioning to become the third Voluntary Remediation Program (VRP) Applicant for the Former Loef Facility (HSI #10376) site in Athens, Clarke County, Georgia (the “VRP Site”). The first two VRP applicants and their original Voluntary Investigation and Remediation Plan (VIRP) application dates were:

- Hull Real Estate, LLC (November 2011)
- OmniSource Athens Division, LLC (March 2015)

The site was accepted by Georgia EPD into the VRP on May 3, 2012.

On March 6, 2017, Owen Electric Steel Company of South Carolina, a wholly owned subsidiary of CMC, purchased two of the three parcels that comprise the currently-defined Former Loef Facility VRP Site. The third parcel of the VRP site (PIN # 162 037) was inadvertently omitted from the initial acquisition in March 2017; however, this omitted third parcel was later purchased by Owen Electrical Steel Company of South Carolina on September 7, 2017. Owen Electric Steel Company of South Carolina is now the legal owner of all three parcels that comprise the VRP site. **Figure 1** attached to this application shows the locations, parcel identifications, and street addresses of the three parcels that comprise the VRP site. Also note that Figure 1 and the application form include corrections or updates to the parcel numbers and street addresses that were presented in previous submittals by the prior VRP applicants.

CMC intends to continue with the overall VIRP that was established and implemented by the preceding two VRP applicants listed above. The primary VIRP and related reports currently on file with Georgia EPD that define the investigation and cleanup plan CMC will follow include the following:

- *Voluntary Investigation and Remediation Plan (VIRP) and Application for the Former Loef Facility (Hull), Athens, Clarke County, Georgia, HSI#10376.* November 2011. (Peachtree Environmental, Inc.).
- Letter Work Plan and VIRP Application and Checklist. March 12, 2015. Letter and VIRP application submitted by OmniSource to Georgia EPD.
- *3rd Semi-Annual Progress Report, Omni Source Facility (Former Loef Company Site), 590 Old Hull Road, Athens, Georgia.* July 30, 2015 (Apex Companies, LLC).

Ongoing results of the VIRP, including minor adjustments to the plan, have been summarized in six Progress Reports submitted to EPD between October 2012 and September 29, 2017. Should minor adjustments to the VIRP be needed as the site closure progresses, CMC will address these in future Progress Reports submitted to the EPD.

Checklist Items 5 and 5.a. through 5.d. – VIRP CONCEPTUAL SITE MODEL AND MILESTONE SCHEDULES

VRP milestone schedules and a Conceptual Site Model (CSM) were presented and/or updated in the following reports previously submitted to EPD by previous applicants:

- *Voluntary Investigation and Remediation Plan (VIRP) and Application for the Former Loef Facility (Hull), Athens, Clarke County, Georgia, HSI#10376.* November 2011. (Peachtree Environmental, Inc.).
- Letter Work Plan and VIRP Application and Checklist. Letter and VIRP application submitted by OmniSource to Georgia EPD. March 12, 2015.
- *Second (2nd) VRP Semi-Annual Progress Report for the Former Loef Facility (Hull), Athens, Clarke County, Georgia.* April 2013 (Peachtree Environmental, Inc.)
- *3rd Semi-Annual Progress Report, Omni Source Facility (Former Loef Company Site), 590 Old Hull Road, Athens, Georgia – HSI#10376.* July 30, 2015 (Apex Companies, LLC)
- *4th Semi-Annual Progress Report, Omni Source Facility (Former Loef Company Site), 590 Old Hull Road, Athens, Georgia.* July 29, 2016 (Apex Companies, LLC)
- *5th Semi-Annual Progress Report, Omni Source Facility (Former Loef Company Site), 590 Old Hull Road, Athens, Georgia.* February 27, 2017 (Apex Companies, LLC)

The *6th Semi-Annual Progress Report* (September 29, 2017: Apex Companies) was submitted to EPD by CMC as the pending VRP Applicant. The *6th Semi-Annual Progress Report* included a work plan for further site characterization, an

official request for an extension of the VRP milestone schedules, and a preliminary schedule of near-term work proposed in the work plan (Section 6.1 of 6th Progress Report). The VRP schedule extension is necessary to complete additional work that may be required under items 5.b. and 5.d., which are based on findings of the 5th *Semi-Annual Progress Report* submitted to EPD by OmniSource and updated with new information in the 6th Progress Report submitted by CMC.

The Georgia EPD presented its position on the site status in a letter dated August 1, 2017. The agency has since stated (verbally) that they will determine the appropriate administrative process for granting CMC's extension request for the VRP schedule. As a result, the milestone completion dates in application items 5.b. and 5.d. are subject to EPD's final administrative decisions, the findings of ongoing site assessment work recently implemented by CMC, and the necessity of any additional investigation phases that may be required based on those findings.