Voluntary Remediation Program Application

RODDENBERY SYRUP PLANT

CAIRO, GRADY COUNTY, GEORGIA

August 25, 2010

Project No. E1107004

Prepared for:

Former Shareholders of W.B. Roddenbery Co.
1393 Stephen Drive, N.W.
Cairo, Georgia 39828

Prepared by:

Gallet & Associates, Inc., A Terracon Company
Birmingham, AL

Gallet
A Terracon COMPANY

August 25, 2010

Ms. Alexandra Cleary
Unit Coordinator
Hazardous Waste Program
Georgia Department of Natural Resources
Environmental Protection Division
2 Martin Luther King, Jr. Drive, S.E.
Suite 1426 East
Atlanta, Georgia 30334

Re: Voluntary Remediation Program Application
Roddenbery Syrup Plant
Cairo, Grady, Georgia
HSI No. 10213
Project No. E1077004

Dear Ms. Cleary:

On behalf of the Former Shareholders of W.B. Roddenbery Co. (Roddenbery), Gallet, A Terracon Company (Gallet), is pleased to submit this Voluntary Remediation Program (VRP) Application for the above-referenced site. This application requests removal of the Site from the Georgia Hazardous Site Inventory (HSI), with no additional groundwater monitoring required, as the Site was listed on the HSI on the basis of a release exceeding a reportable quantity to soil only. A release exceeding a reportable quantity to groundwater was not present at the time of listing nor at present time. Further, based on the over seventeen years of extensive soil and groundwater investigation and corrective action activities, including twelve years of groundwater monitoring, the application requests that no additional monitoring activities be required with regard to the Site.

Based on the Georgia EPD website *Frequently Asked Questions* (rev. April 6, 2010), it is our understanding that submitting the VRP application suspends any Hazardous Site Response Act (HSRA) deadlines until the Director either accepts Roddenbery as a participant in the VRP or notifies Roddenbery that the application is unacceptable and specifies a new deadline under HSRA. Therefore, the deadline for groundwater monitoring and submittal of an Annual Compliance Monitoring Report and any other HSRA deadlines are assumed to be suspended pending the Director's determination to accept the enclosed VRP application.

We appreciate your consideration of this application. Please contact us if you have questions or need additional information.

Sincerely,
Gallet, A Terracon Company

Frank M. Nowicki
Senior Project Engineer

Leslie Noble, GA-PG # 966
Manager, Environmental Services

cc: Ms. Rebecca Cline

Attachments

Gallet
A Terracon COMPANY

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APPENDICES

VOLUNTARY REMEDIATION PROGRAM APPLICATION

RODDENBERY SYRUP PLANT
CAIRO, GRADY COUNTY, GEORGIA
HSI SITE NUMBER 10213
Project No. E1107004
August 25, 2010

1.0 INTRODUCTION

1.1 Site Description and History

The W.B. Roddenbery Company (Roddenbery) site located at 301 First Street NW[1], Cairo, Grady County, Georgia is listed on the Georgia Hazardous Site Inventory as HSI Site Number 10213. A Site Location Map and Tax Maps are included in Appendix A. As described below, the site was listed on the HSI on the basis of a release to soil only. Although a release to groundwater exceeding a reportable quantity was not present at the time of the listing of the site in 1994 (and continues not to be present to date), Roddenbery was required to remediate both soil and groundwater to meet HSRA risk reduction standards. As a result, numerous investigatory and remedial activities have been undertaken at the site over a 17-year period, at a cost of over $830,000, resulting in numerous reports submitted to the Georgia Environmental Protection Division, including a Compliance Status Report, Corrective Action Plans and Reports and ongoing groundwater monitoring reports. All of these reports may be referenced for additional information on the site, beyond the pertinent information provided in this Application.

As stated above, the site has been the subject of extensive investigation, remediation, and reporting activities since March 1994. A brief history of the site is provided below:

- *March 11, 1994* – Release Notification initially submitted to EPD based on a release of pentachlorophenol to groundwater from a wood treatment vat formerly used at the site.
- *June 29, 1994* – Site initially listed on the Hazardous Site Inventory on the basis of a release of pentachlorophenol to groundwater.
- *February 14, 1997* – Request for HSI Delisting submitted to EPD, which attached a well survey demonstrating that no drinking water well was located within one mile of the site, thus the site did not have a release to groundwater exceeding a reportable quantity. A copy of the February 14, 1997 letter and the well survey are included in Appendix B.
- *August 29, 1997* – EPD responds via letter, agreeing that there was not a release to groundwater exceeding a reportable quantity at the time of listing; however, EPD determined that a release exceeding a reportable quantity to soil did exist at the site and

[1] Also referred to as 101 1st Street NW and 301 First Avenue

thus the site could not be removed from the HSI. A copy of the August 29, 1997 letter is included in Appendix C.

- *February 12 1998* – Compliance Status Report submitted (and revised on July 9, 1999) which documents several contaminants exceeding risk reduction standards for soil and groundwater at the Site.
- *November 30, 2001* – Source Removal Report submitted documenting the removal of more than 1200 tons of soil, concrete and other site debris as excavated, transported and disposed offsite, resulting in the conclusion that soil is in compliance with Type 1 Risk Reduction Standards.
- *December 7, 2001*– EPD concurs that Site is in compliance with HSRA Type 1 Risk Reduction Standards for Soil.
- *2003 – 2005* – Groundwater Corrective Action Plan dated November 19, 1998 (as revised on March 8, 1999 and April 25, 2003) implemented. The Groundwater CAP involved in-situ biodegradation and bioaugmentation to remediate groundwater. Five rounds of bacteria and nutrient injections were completed in accordance with an approved *Underground Injection Control (UIC) Permit*. More than 500 gallons of microbial degrader and 2,000 gallons of nutrients were injected via direct-push technology. Despite the aggressive groundwater remediation, low levels of naphthalene and pentachlorophenol above groundwater risk reduction standards persist at the site.
- *2003 to present* – Compliance groundwater monitoring has been performed at the site. Numerous *Semi-Annual Compliance Monitoring Reports* and *Annual Compliance Monitoring Reports* have been submitted by Roddenbery, with the most recent report being submitted on February 27, 2010.

As described in the November 30, 2001 Source Removal Report (and confirmed by EPD on December 7, 2001) all soils at the site are in compliance with Type 1 Risk Reduction Standards, therefore no additional corrective action with respect to soil at the site is needed.

Further, no additional corrective action with regard to groundwater at the site is warranted, and rather the site should be enrolled in the Georgia Voluntary Remediation Program (VRP) and removed from the Hazardous Site Inventory pursuant to Section 12-8-107(g)(2) of the VRP Act that states:

> *The participant shall not be required to perform corrective action or to certify compliance for groundwater at the voluntary remediation property if the voluntary remediation property was listed on the inventory as a result of a release to soil exceeding a reportable quantity for soil but was not listed on the inventory as a result of a release to groundwater exceeding a reportable quantity, and if the participant further demonstrates to the director at the time of enrollment that a*

> *release exceeding a reportable quantity for groundwater does not exist at the voluntary remediation property . . .*

As will be demonstrated herein, the site qualifies for removal from the HSI pursuant to this statutory provision. Upon enrollment in the VRP, it is proposed that the site be removed from the HSI and that the extensive investigation and remediation activities performed to date be deemed sufficient to meet the criteria of the VRP and that no further remedial action be required.

1.2 VRP Eligibility

The site is eligible to be a participant in the VRP because:

- The site currently is under regulation of the Georgia HSRA Program; and
- The party responsible for responding to the HSI site is doing so per the attached Agreement with the Site Owner.

Similarly, the Site is eligible because it is:

- Not in violation of any order, judgment, statute, rule or regulation subject to the enforcement authority of EPD,
- Not listed on the National Priorities List,
- Not undergoing response activities required by the United States Environmental Protection Agency,
- Not a permitted TSDF, and
- Not in violation of orders or regulations subject to the enforcement authority of Georgia EPD.

2.0 PRELIMINARY CONCEPTUAL SITE MODEL

2.1 Regional and Site Geology

The City of Cairo lies within the Georgia Coastal Plain Physiographic Province. The sediments and rocks beneath the Cairo area primarily consist of limestones and dolomites overlain by clays, sands and minor carbonate deposits. The clastic deposits of the post-Miocene Miccosukee Formation form the uppermost geologic unit in the Cairo area, and are described as consisting of primarily thin-bedded, fine to medium grained, orange to reddish brown sands with layers of laminated clay. The Miccosukee Formation sediments are generally 30 to 60 feet thick

in the Cairo area (Herrick, 1961). The Miccosukee Formation is underlain by the Miocene sediments of the Hawthorne Group. The upper Hawthorne Group is composed predominantly of pale gray to green sandy clays with relatively minor amounts of phosphate, and outcrops in valleys to the southwest and southeast of Cairo. The lower half of the Hawthorne Group consists of a carbonate unit (Herrick and Vorhis, 1963).

Cross-sections were prepared to illustrate the Site geology. These cross-sections (Figures 3.1 and 3.2 from the CSR) are included in Appendix D. Subsurface soils at the Site consist of a mixture of silty clays, sandy clays, clays, clayey silty sands, and thin sand layers, to a depth of 34 to 46 feet below ground surface (bgs). The clays and sands are interbedded and do not appear to be continuous across the Site. A white to light gray soft, blocky clay underlies the interlayered clays and sands. The soft blocky clay is approximately 80 feet in thickness according to a log of an abandoned well located approximately 200 feet southwest of the Plant.

2.2 Regional and Site Hydrogeology

The surficial aquifer in the Cairo area is within the Miccosukee Formation which is generally 30 to 60 feet in thickness. The Miccosukee Formation is an unconfined surficial aquifer.

The clays of the upper Hawthorne form a regional confining unit over the carbonates of the lower Hawthorne and the Floridan aquifer system. This upper confining unit of the Floridan aquifer system has a thickness of 350 feet in central Grady County. The carbonates of the confined Floridan aquifer system are over 600 feet thick and form the main water-producing unit in the Cairo area (Herrick and Vorhis, 1963).

The Floridan aquifer system is composed of all or parts of several different formations, and is defined primarily by the presence of permeable carbonate rocks. A small graben system (i.e. a basin formed by faults) forms the Gulf Trough system that occurs in central Grady County. Limestone units that are part of the Floridan aquifer system are less permeable within the Gulf Trough than those on either side, and the aquifer system is thinner in the trough (Miller, 1986). The Floridan aquifer system ranges from 300 to 400 feet in thickness within the trough. The City of Cairo currently operates water supply wells that withdraw water from the Floridan aquifer system. The supply wells are located approximately two miles southeast of the site.

Groundwater at the site has been evaluated by the use of seven permanent monitoring wells, seven temporary piezometers, three stream gauges, and 12 DPT borings. The surficial aquifer at the site is present approximately three to eight feet below ground surface and extends downward to the Hawthorn Formation (expected to be approximately 70 feet bgs). Geologic descriptions of the subsurface soils at the site indicate the surficial aquifer is comprised of interconnected groundwater zones which are underlain by a light gray friable silty clay. The zones are comprised of sands, clayey sands and/or coarse sandy clays and are separated by stiff clays, and sandy clays. The underlying light gray soft friable clay (also defined as a light gray blocky soft clay) appears to retard the movement of groundwater and is approximately 80 feet in thickness. The surficial aquifer is not considered to be a primary or secondary source of water in the area.

2.3 Site Specific Constituents of Interest

The original list of constituents of interest (COI) for the Site was based on compounds detected during previous investigations above the respective HSRA notification concentrations in soil or above background levels in ground water. Additionally, all polynuclear aromatic hydrocarbons were included on the original site-specific COI list. This original COI list is presented in Section 2.4 of the Compliance Status Report dated February 12, 1998 and revised July 9, 1999 (collectively, CSR). However, the extensive soil and groundwater corrective action activities have resulted in only two COIs remaining above HSRA RRS -- pentachlorophenol and naphthalene in groundwater.

2.4 Source Area

The source of the contamination was a former wood treatment vat located onsite. The activities associated with the removal of the source were described in detail in the *Source Removal Report* dated November 30, 2001.

2.5 Soil Assessment

Soil assessment activities and confirmatory sampling and analyses performed after completion of the source removal have successfully delineated the extent of COI in soils at the site to Type 1 Risk Reduction Standards (RRS), as documented in the November 30, 2001 Source Removal Report, which was approved by EPD on December 7, 2001. The original horizontal and vertical extent of COI in soil is described in Sections 4.4 and 4.5 of the CSR. Figure 4.2 from the CSR illustrates the original delineation of the COI in soil prior to the extensive corrective action activities, which resulted in all soil concentrations at or below Type 1 HSRA risk reduction standards. A copy of this figure is included in Appendix E. EPD has concurred per letter dated December 7, 2001 that soil remediation has achieved Type 1 RRS. A copy of the letter is included in Appendix E. Table 1 from the *Source Removal Report* (copy included in Appendix E) indicates the results of post-excavation confirmatory soil sampling.

2.6 Groundwater Assessment and Remediation

Groundwater assessment activities have successfully delineated the extent of COI in groundwater at the site to Type 1 and Type 2 RRS (Type 1 for naphthalene and Type 2 for pentachlorophenol). The horizontal and vertical extent of COI in groundwater is described in Sections 5.6 and 5.7 of the CSR. Figure 5.3 from the CSR illustrates the delineation of the COI in groundwater. A copy of this figure is included in Appendix F.

Extensive groundwater remediation activities have occurred at the site, primarily through implementation of a Corrective Action Plan (Revision 3 Amended, dated April 25, 2003), which was approved by EPD on May 6, 2003. From 2003 to 2005, a combination of in-situ biodegradation and bioaugmentation was implemented at the Site to remediate groundwater. Five rounds of bacteria and nutrient injections were completed in accordance with an approved *Underground Injection Control (UIC) Permit*. More than 500 gallons of microbial degrader and 2,000 gallons of nutrients were injected via direct-push technology. Although the corrective action had positive results with regard to the groundwater impacts (COI concentrations reduced

approximately 70% to 90% in target area wells), low levels of naphthalene and pentachlorophenol persist above groundwater risk reduction standards. Figure 4 from the most recent Annual Compliance Monitoring Report identifies the limited remaining detections of naphthalene and pentachlorophenol above HSRA Risk Reduction Standards. A copy of this figure is included in Appendix F.

Groundwater monitoring has been, and continues to be performed, at the site (for a total of 12 years of monitoring). Numerous *Semi-Annual Compliance Monitoring Reports* and *Annual Compliance Monitoring Reports* have been submitted to EPD, with the most recent report being submitted on February 27, 2010. Table 3 from this report provides a comprehensive summary of groundwater analytical results from 2001 to present and is included in Appendix F.

2.7 Transport Mechanisms

As reported in the CSR, potential contaminant transport mechanisms at the site included soils, groundwater and sediments. Evaluation of each of these mechanisms was performed, and the results reported in Section 6.2.2 of the February 12, 1998 CSR (rev. July 9, 1998) and additional information on these transport mechanisms can be found in the CSR.

2.8 Potential Specific Receptors

Potential specific receptors are addressed in Section 6.3 of the CSR and remain unchanged to date. Potential human receptors including children and adult residents and workers were addressed in Section 6.3.1 of the CSR. Potential environmental receptors (plant and animal species) were addressed in Section 6.3.2 of the CSR.

2.9 Exposure Pathways

Exposure pathways are addressed in Section 6.4 of the CSR and remain unchanged to date.

2.10 Surface Water and Groundwater Usage

Based on site reconnaissance, no surface water bodies have been identified within 1,000 feet of the source area. A water well survey submitted with the February 14, 1997 request for delisting confirmed that no water wells existed within one mile of the site at the time of the original listing. The City of Cairo Energy Services Director has confirmed in letters dated June 30, 2009 and August 9, 2010 that they have no active water wells in the vicinity of the site, confirming the results of the 1997 well survey (Appendix B). Copies of these letters from the City of Cairo are included in Appendix G.

3.0 PRELIMINARY REMEDIAL ACTION PLAN

3.1 Proposed Remedial Action

As stated in Section 1.0 of this document, extensive remediation of both soil and groundwater at the site has been performed. Soil remediation included excavation and offsite disposal of contaminated soil, followed by confirmatory sampling and analyses. Those activities are described in the 2001 *Source Removal Report*. Groundwater remediation included in-situ bioremediation and monitoring, in accordance with the approved CAP. Groundwater remediation activities have been described in numerous *Corrective Action Progress Reports*, *Semi-Annual Compliance Monitoring Reports* and *Annual Compliance Monitoring Reports*. Based on the proposed removal of the site from the HSI, additional remedial action is not required.

3.2 Schedule

A projected milestone schedule, as described in the VRP Application Form and Checklist, is not applicable to the site, because each of the four generic milestones [(1) onsite horizontal delineation within 12 months; (2) offsite horizontal delineation within 24 months; (3) vertical delineation and remediation plan within 30 months; and (4) compliance status report within 60 months] has already been completed. Further, as Roddenbery proposes that the site be removed from the HSI, Roddenbery also proposes that no additional activities are necessary beyond the extensive investigation and remediation activities under taken over the past 17 years at the site.

3.3 Request for Removal from HSI

In accordance with Section 12-8-107(g)(2) of the VRP Act , Roddenbery requests that the site be removed from the HSI, with no additional work deemed necessary based on the following:

- The Property was listed on the HSI as a result of a release to soil exceeding a reportable quantity and was not listed on the HSI as a result of a release to groundwater exceeding a reportable quantity. This is confirmed in a letter dated August 29, 1997 from EPD.
- At the time of enrollment in the VRP, a release exceeding a reportable quantity for groundwater did not exist. This is demonstrated by the 1997 well survey, along with the recent letter from the City of Cairo, confirming that the City has no drinking water wells located in the vicinity of the site.
- Groundwater protection requirements for soil are met as all soils at the Site meet Type 1 Risk Reduction Standards and thus it is not necessary to determine additional protection requirements based on the established point of exposure for groundwater.

Voluntary Remediation Plan Application Form and Checklist

VRP APPLICANT INFORMATION					
COMPANY NAME	Former Shareholders of W.B. Roddenbery Co.				
CONTACT PERSON/TITLE	Rebecca R. Cline / Shareholders' Representative				
ADDRESS	1393 Stephen Drive, N.W., Cairo, Georgia 39828				
PHONE	(229) 377-9728	FAX	none	E-MAIL	rcline@syrupcity.net

GEORGIA CERTIFIED PROFESSIONAL GEOLOGIST OR PROFESSIONAL ENGINEER OVERSEEING CLEANUP					
NAME	Leslie L. Noble			GA PE/PG NUMBER	PG 966
COMPANY	Gallet, A Terracon Company				
ADDRESS	110 12th Street North, Birmingham, Alabama 35203				
PHONE	(205) 942-1289	FAX	(205) 443-5302	E-MAIL	lnoble@terracon.com

APPLICANT'S CERTIFICATION

In order to be considered a qualifying property for the VRP:

(1) The property must have a release of regulated substances into the environment;
(2) The property shall not be:
- (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.
- (B) Currently undergoing response activities required by an order of the regional administrator of the federal Environmental Protection Agency; or
- (C) A facility required to have a permit under Code Section 12-8-66.

(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.
(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.

In order to be considered a participant under the VRP:
- (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.
- (2) The participant must not be in violation of any order, judgment, statute, rule, or regulation subject to the enforcement authority of the director.

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.

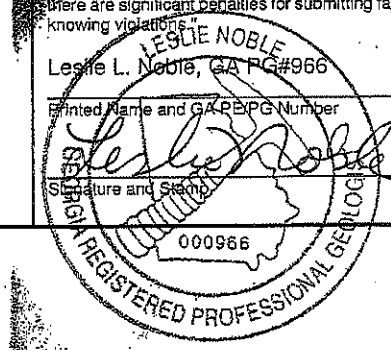
I also certify that this property is eligible for the Voluntary Remediation Program (VRP) as defined in Code Section 12-8-105 and I am eligible as a participant as defined in Code Section 12-8-106.

APPLICANT'S SIGNATURE	Rebecca R. Cline Wyman H. Richter, Jr.		
APPLICANT'S NAME/TITLE (PRINT)	Rebecca R. Cline / Shareholders' Representative Wyman H. Richter, Jr. / Shareholders' Representative	DATE	9-7-10

QUALIFYING PROPERTY INFORMATION			
TAX PARCEL ID	C0200-083-000	PROPERTY SIZE (ACRES)	2.02
PROPERTY ADDRESS	301 First Street NW (Also referred to as 101 1st Street NW and 301 First Avenue)		
CITY	Cairo	COUNTY	Grady
LATITUDE	30.877955	LONGITUDE	-84.210505
PROPERTY OWNER(S)	City of Cairo	PHONE #	(229) 377-1722
MAILING ADDRESS	PO Box 29		
CITY	Cairo	STATE/ZIP	GA 31728

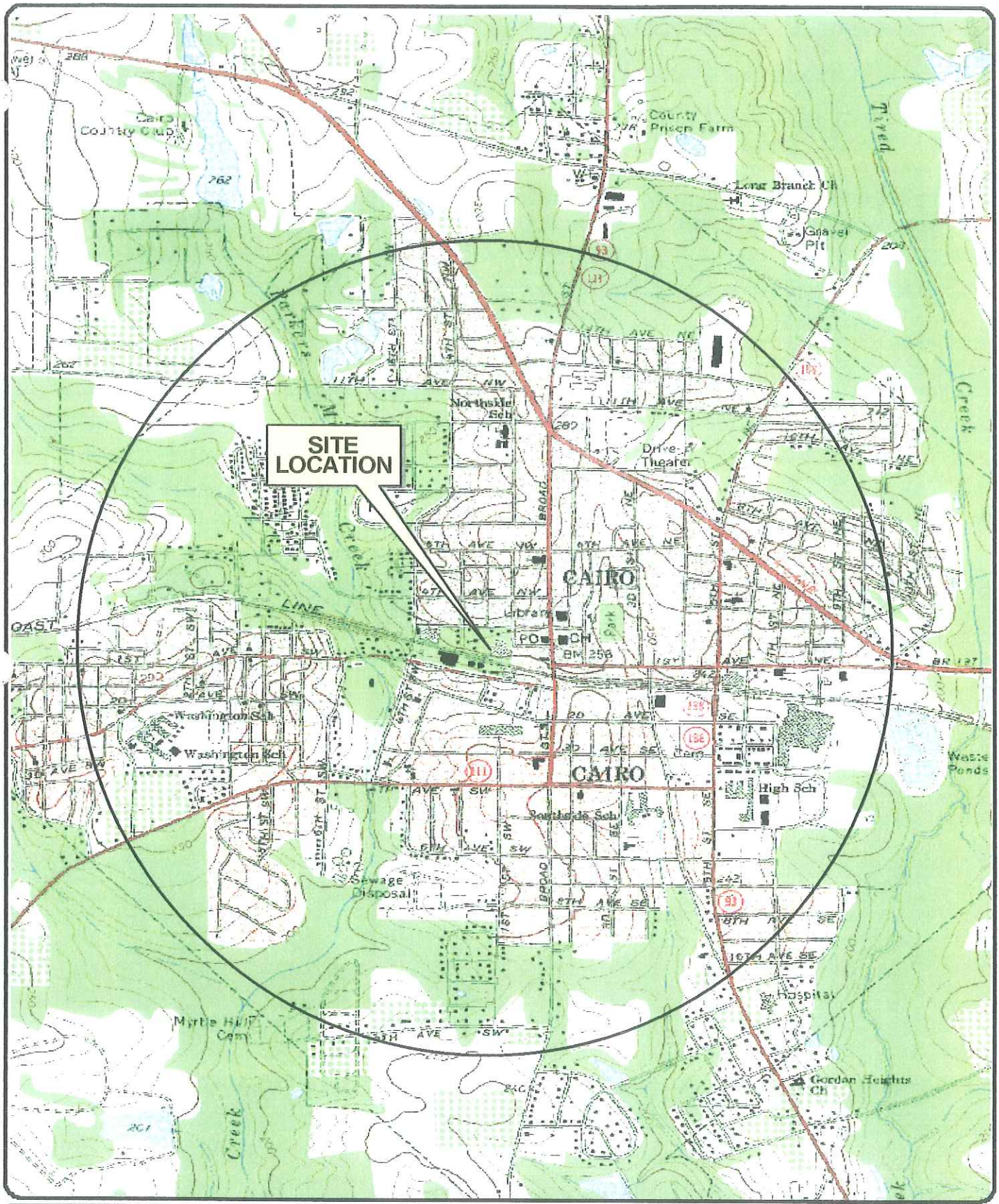
ITEM #	DESCRIPTION OF REQUIREMENT	Location in VRP (i.e. pg., Table #, Figure #, etc.)	For EPD Comment Only (Leave Blank)
1.	**$5,000 APPLICATION FEE** IN THE FORM OF A CHECK PAYABLE TO THE GEORGIA DEPARTMENT OF NATURAL RESOURCES.	Enclosed Envelope	
2.	**WARRANTY DEED(S)** FOR QUALIFYING PROPERTY.	Appendix A	
3.	**TAX PLAT** OR OTHER FIGURE INCLUDING QUALIFYING PROPERTY BOUNDARIES, ABUTTING PROPERTIES, AND TAX PARCEL IDENTIFICATION NUMBER(S).	Appendix A	
4.	**ONE (1) PAPER COPY AND TWO (2) COMPACT DISC (CD) COPIES** OF THE VOLUNTARY REMEDIATION PLAN IN A SEARCHABLE PORTABLE DOCUMENT FORMAT (PDF).	-----	
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 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. 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:	Sections 2 and 3 Pages 3 – 7 and Appendices D, E, and F See Below	

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;	Sections 2.5 and 2.6 and Appendices E and F	
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;	Sections 2.5 and 2.6 and Appendices E and F	
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	Section 3.0	
5.d.	Within 60 months after enrollment, the participant must submit the compliance status report required under the VRP, including the requisite certifications.	Section 1.1	
6.	**SIGNED AND SEALED PE/PG CERTIFICATION** AND SUPPORTING DOCUMENTATION: "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. 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. 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." Leslie L. Noble, GA PG#966 Printed Name and GA PE/PG Number Signature and Stamp 8/25/10 Date	----	



- Due to the 17 years of investigation and corrective actions at the site and 12 years of groundwater monitoring, Roddenbery requests that no additional groundwater monitoring be required. Such additional groundwater monitoring is not necessary to protect human health and the environment.

Appendix A



DESIGNED	-
DRAWN	GIS/DMH
CHECKED	-
DATE	6/19/2003
PROJ. NUMBER	1682-0115
FIGURE NO.	1

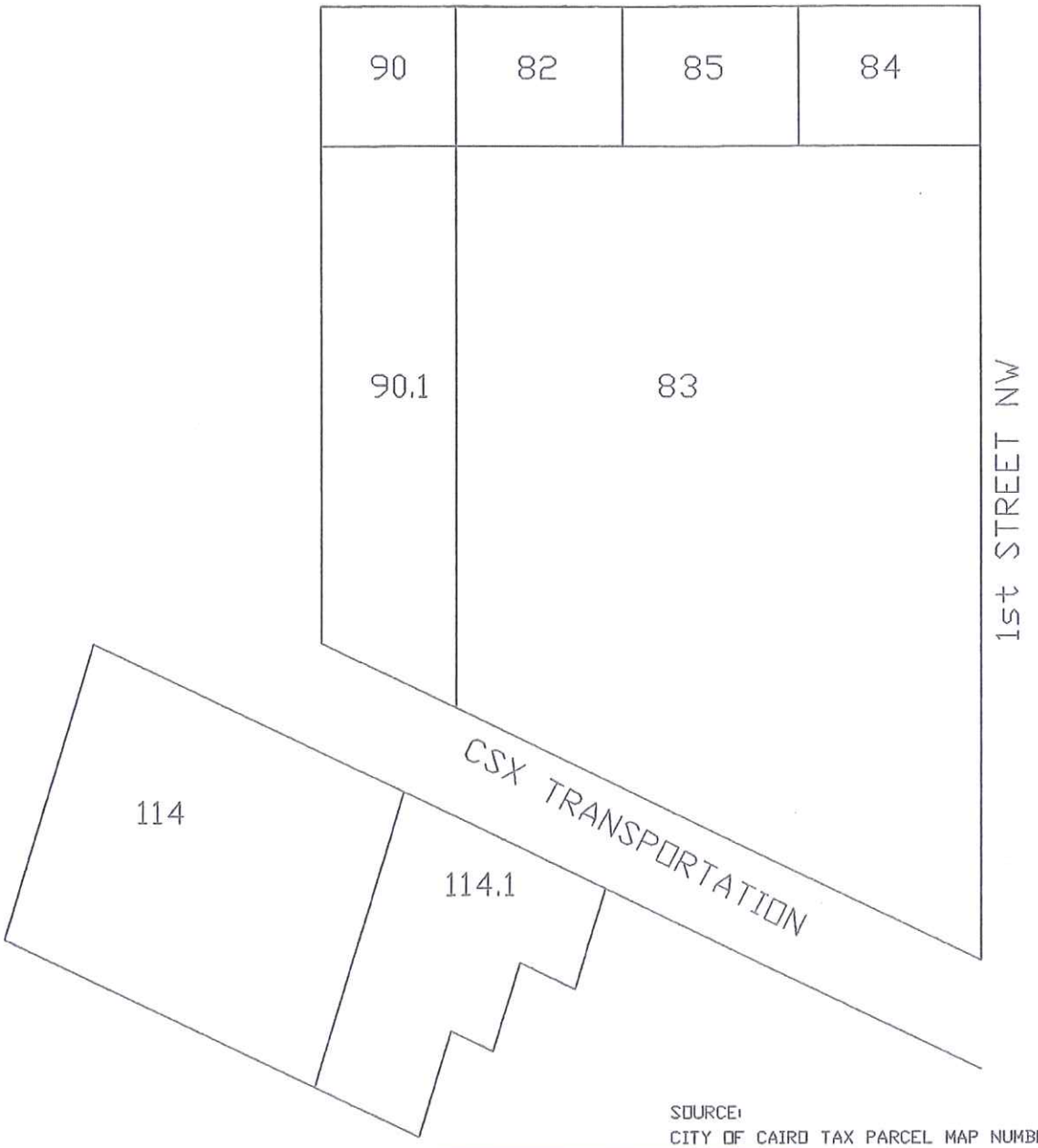
SITE LOCATION MAP
WITH ONE-MILE RADIUS

RODDENBERY SYRUP PLANT
CAIRO, GEORGIA

Prepared By:

Williams Environmental Services, Inc.

A Subsidiary of Williams Group International, Inc.
500 Chase Park South, Suite 150
Birmingham, Alabama 35244
205-988-8305 Fax: 205-988-5249



SOURCE:
CITY OF CAIRO TAX PARCEL MAP NUMBERS C-13 AND C-20

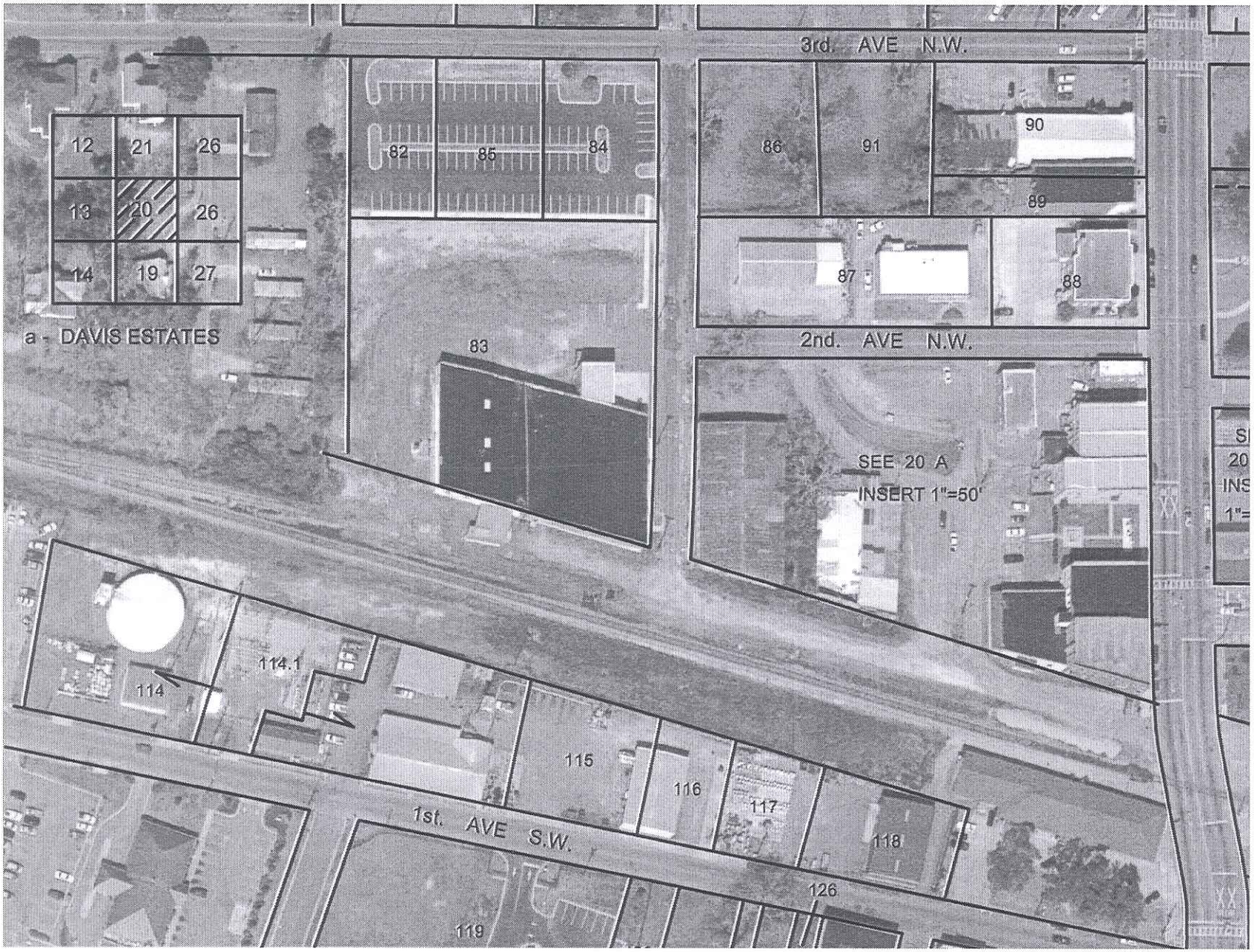
Charles V. Hughes	C-13-90	ALTON MASH
Jason S. Harris	C-13-90.1	HENRY L. HAYES, JR.
City of Cairo	C-20-82	MARY A. CARRIKER
City of Cairo	C-20-83	W.B. RODDENBERY CO., INC.
City of Cairo	C-20-84	DEWITT MILLER
City of Cairo	C-20-85	DEWITT MILLER
City of Cairo	C-20-114	CITY OF CAIRO
Municipal Electric Authority of Georgia	C-20-114.1	CITY OF CAIRO

SCALE:	NTS
DRAWN	TCM
CHECKED	–
DATE	07/08/99
PROJ. NUMBER	1682-0020
FIGURE NO.	2.3

TAX MAP

RODDENBERY SYRUP PLANT
CAIRO, GEORGIA

Prepared By:
WILLIAMS ENVIRONMENTAL SERVICES, INC.
A Williams Group International Company
500 Chase Park South, Suite 150, Birmingham, Alabama 35244
205-988-8305 Fax: 205-988-5249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BOOK 510 PAGE 438

GRADY COUNTY GEORGIA
FILED IN OFFICE

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ANNETTE H. ALRED
CLERK OF SUPERIOR COURT

GRADY COUNTY GEORGIA
REAL ESTATE TRANSFER TAX
Paid $ -0-
Date SEP 29 2000
Annette H. Alred
Clerk of Superior Court

RETURN TO:
LEHMAN & CAULEY, LLP
ATTORNEYS AT LAW
P.O. Box 156
Cairo, GA 31728

QUIT CLAIM DEED

STATE OF GEORGIA, GRADY COUNTY:

THIS INDENTURE, made this ____ day of July, 2000 between W.B. RODDENBERY COMPANY, INC, of the first part, and CITY OF CAIRO of the second part;

WITNESSETH THAT:

The said party of the first part, for and in consideration of the sum of ONE DOLLAR ($1.00), receipt of which is acknowledged, hath bargained and sold and by these presents do bargain, sell and forever quit claim unto the said party of the second part, its successors and assigns, all of the following described lands:

All that tract or parcel of land together with all improvements located thereon lying and being in the City of Cairo, Grady County, Georgia, said tract or parcel being bounded now or formerly as follows: South CSX Transportation right-of-way; east by 1st Street NW; north by lands of Dewitt Miller and Mary Carriker; west by lands of Hughes. Said tract or parcel being known as the W.B. Roddenbery Syrup Plant and being the same property conveyed to the W.B. Roddenbery Company, Inc. by warranty deed recorded in Deed Book 73, Page 154, and Deed Book 132, Pages 598,605,606,607, Grady County Records.

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 concerning this property. This notice is provided in compliance with the Georgia Hazardous Site Response Act.

This property has been subject to a Compliance Agreement by and between the United States Environmental Protection Agency, Dean Foods Company, Dean Dairy Products Company and David Koontz, EPA Case No. 96-0133-00, 96-0133-01 and 96-0133-02.

Forever relinquishing all rights, title, claim or demand in and to the above-described lands, improvements and appurtenances to the said party of the second part, its successors assigns, in fee simple.

IN WITNESS WHEREOF, the said W.B. RODDENBERY COMPANY, INC has hereunto set its hand and affixed its seal on the day and year first above written.

W.B. RODDENBERY COMPANY, INC

BY: William M. Gregg Jr. (SEAL)

ATTEST: Dale E Klebe (SEAL)

(AFFIX SEAL)

Signed, sealed and delivered
in the presence of:

Ann M. Krause
(Unofficial Witness)

Notary Public, Betty J. Zabratanski
My Commission Expires: 2/26/03
(AFFIX SEAL)

Z:\COREL\docs\DEEDS\ctycairo.qcd.wpd

OFFICIAL SEAL
BETTY J ZABRATANSKI
NOTARY PUBLIC STATE OF ILLINOIS
MY COMMISSION EXP. FEB. 26,2003

AGREEMENT

This Agreement dated this _____ day of July, 2000 by and between W.B. Roddenbery Company, Inc. ("Roddenbery") and the City of Cairo ("City").

WHEREAS, Roddenbery has agreed to donate to the City that certain real estate described in Exhibit A attached hereto (the "Real Estate").

WHEREAS, Roddenbery and the former shareholders of Roddenbery have been engaged in remediating an environmental condition at the Real Estate relating to releases of pentachlorophenol and polynuclear aromatic hydrocarbons associated with the former wood treating vat that led to the listing of the Real Estate on Georgia's Hazardous Site Inventory as Site Number 10213 (the "Environmental Condition")

WHEREAS, the parties desire for Roddenbery to provide for continued remediation of the Environmental Condition subsequent to donation to the City.

NOW THEREFORE, in consideration of the premises and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties agree as follows:

Roddenbery agrees that it shall be responsible for any and all future expenses related to the Environmental Condition, as required by the Georgia Department of Natural Resources Environmental Protection Division ("EPD"), until such time as the EPD agrees with the compliance status certification for Site Number 10213 and requires no additional corrective action. The City agrees to grant Roddenbery, its agents, consultants and representatives access to the Real Estate in order to carry out its obligations under this Agreement. Roddenbery, or its representatives, shall have the exclusive right to appear before any administrative agency on any matter relating to the Environmental Condition, oppose the position taken by any such agency, and challenge in court or otherwise appeal the determination of such agency.

Except as set forth above, Roddenbery makes no representation as to the condition, environmental or otherwise, of the Real Estate and Roddenbery shall have no other liability or obligation with respect to the Real Estate after transfer to the City.

IN WITNESS WHEREOF the parties have executed this Agreement as of the date first set forth above.

CITY OF CAIRO

By: Van A. Hall

Its: Mayor

W.B. RODDENBERY COMPANY, INC.

By: Dale E. Kelley

Its: Secretary

kjd\agree\roddenbery revision

Appendix B

KILPATRICK STOCKTON LLP

Attorneys at Law
Suite 2800
1100 Peachtree Street
Atlanta, Georgia 30309-4530
Telephone: 404.815.6500
Facsimile: 404.815.6555

E-mail: astack@kilstock.com
Direct Dial: 404.815.6572

February 14, 1997

Mr. Tim Cash
Program Manager
Hazardous Site Response Program
Georgia Environmental Protection Division
205 Butler Street, S.E., Suite 1158
Atlanta, Georgia 30334

Re: Request for HSI Delisting
W.B. Roddenbery Syrup Plant - Cairo, Georgia
HSI Site 10213

Dear Mr. Cash:

This letter is submitted on behalf of W. B. Roddenbery Company, Inc. ("Roddenbery") in regards to the listing of Roddenbery's Cairo, Georgia property (the "Site") on the Hazardous Site Inventory ("HSI") on June 29, 1994. Based on our review of Roddenbery's file and a subsequent extensive drinking water well survey (the "Well Survey Report") performed by Sailors Engineering Associates, Inc. ("SEA"), it appears that EPD's scoring of the Site was based on erroneous information regarding the nearest drinking water supply at the time of listing. A copy of the Well Survey Report is attached. (Attachment A). Based on the information discussed below, it does not appear that the Site had experienced a release exceeding a reportable quantity at the time of listing of the Site on the HSI, therefore delisting of the site is appropriate.

Roddenbery submitted notification of a release of pentachlorophenol to ground water on March 18, 1994. On June 29, 1994, EPD listed the site on the Hazardous Site Inventory on the basis of a Ground Water Pathway score that exceeded the reportable quantity. The On-Site Exposure score was not exceeded and is not at issue here.

The EPD's Ground Water Pathway scoring of the Site exceeded the Reportable Quantity of 10. In its calculations of the Ground Water Pathway score, EPD assumed that the distance to the nearest drinking water well was .5 to 1 mile from the ground water plume at the Site. It is our understanding from discussions with EPD personnel that this information was obtained from City of Cairo files which purportedly indicated the location of Cairo municipal wells. In performing the recent extensive well survey, SEA interviewed and subsequently received a letter from David Smith, the Utilities Director for the City of Cairo, which states that "[a]fter considerable review of the files regarding the operations of the six

inactive/abandoned [municipal] wells within the city of Cairo, we have concluded that none of the six wells were in operation after 1990." (A copy of this letter is included in the Well Survey Report). Since at least 1990, the City of Cairo's drinking water source has been deep wells located approximately two miles from the Site and in an upgradient direction. Based on this information, it is clear that the City's records upon which EPD based its "distance to drinking water well" factor which resulted in an elevated scoring of the site were misleading and inaccurate.

It should also be noted that Roddenbery's notification form, prepared by an out-of-state consulting firm unfamiliar with HSRA's Reportable Quantity Screening Method and Guidance Manual, indicated that the distance to drinking water was "unknown", and never recommended to Roddenbery that a well survey be performed to clarify the distance to drinking water. Now that such a survey has been performed, the correct "distance to drinking water well" factor can be used. **SEA's recent well survey concluded that there were no public or private drinking water wells in use within one mile of the site in the presumed southwesterly ground water flowpath on June 29, 1994, the date the Site was listed on the HSI.**

Based on the foregoing discovery of the inaccuracies involved in the previous scoring of the Roddenbery site, we have calculated a revised Ground Water Pathway score for the Site. Based on our calculations which are set out in Attachments B and C hereto, the Roddenbery site has a Ground Water Pathway score of 6.5, well below the Ground Water Pathway threshold for HSI listing of 10. Therefore, in accordance with Rule 391-3-19-.05(4)(a), we request that EPD remove the Site from the HSI, as the Site had not "experienced a release which exceeded a reportable quantity at the time of listing the Site on the HSI".

If you have any questions or need any additional information regarding this matter, please call and we will provide it immediately. After reviewing this information, we believe EPD will concur that this site should be removed from the HSI. We look forward to hearing from you.

Very truly yours,

Ann Marie Stack

Ann Marie Stack

Enclosure
cc: Mr. Julian Roddenbery

Attachment A

[illegible] ASSOCIATES, INC.
Geotechnical • Environmental

SEA

SAILORS ENGINEERING ASSOCIATES, INC.

1675 SPECTRUM DRIVE • LAWRENCEVILLE, GA. 30243 • TEL (770) 962-5922 • FAX 962-7964

Drinking Water Well Survey
Roddenbery Property
17 First Avenue, NE
Cairo, Georgia

SEA Job #962-227

SEA

SAILORS ENGINEERING ASSOCIATES, INC.

1675 SPECTRUM DRIVE • LAWRENCEVILLE, GA. 30243 • TEL (770) 962-5922 • FAX 962-7964

February 13, 1997

Ms. Ann Marie Stack
Kilpatrick & Stockton LLP
1100 Peachtree Street
Suite 2800
Atlanta, Georgia 30309

RE: Drinking Water Well Survey
Roddenbery Property
17 First Avenue, NE
Cairo, Georgia
SEA Job #962-227

Dear Ms. Stack:

I. Introduction

Sailors Engineering Associates, Inc. (SEA) has conducted a Drinking Water Well Survey in Cairo, Georgia. The purpose of the survey was to identify any drinking water wells that were in use on June 29, 1994 and located southwest along the presumed flow path and within one mile of a known location of a regulated substance at the Roddenbery Syrup Plant located at 17 First Avenue, NE, Cairo, Georgia. SEA has discovered no water wells that were in use as a drinking water supply on June 29, 1994 along the presumed ground water flow path within one mile from a known location of a regulated substance at the Roddenbery facility. Further, no wells have been discovered that are currently being used for a drinking water supply in the same area.

II. Methodology

The survey was performed by our Mr. Robert W. Harris, P.G., assisted in the field by Mr. Will Mallory, Technician. The well survey was conducted as follows:

1) Searching data bases of known wells maintained by the United States Geological Survey (USGS) and by Georgia Environmental Protection Division (EPD);

2) talking with City of Cairo officials;

3) telephone interviews with persons living in the survey area;

4) driving portions of the survey area and looking for wells; and

5) walking portions of the area and conducting door-to-door interviews with residents.

The survey area was identified as that portion of a circle around the Roddenbery site with a radius of one mile that lies south of latitude 30°52'41"N and west of longitude 84°12'37"W. The resulting area is bisected by the reported ground water flow direction at the site. Potentiometric surface maps prepared May 23, 1994 by Ground Water Technology, Inc. indicating the southwesterly flow are attached. (Attachment A)

III. City of Cairo Wells

The City of Cairo uses well water for its municipal water system. The wells currently in use are located approximately two miles east of the Roddenbery site and are depicted on the attached "City Well Map" (Attachment B) as Cairo Well Nos 7, 8, and 9. The city has operated five wells within one mile of the Roddenbery site in the past. These wells are designated as Well Nos 1, 2, 4, 5 and 6. Well Nos 1, 2, and 4 appear on USGS, Georgia District National Water Information System (NWIS) Ground-water Site Inventory (GWSI). Georgia EPD's database of drinking water sources includes Well Nos 1 and 4. According to the attached letter (Attachment C) from Mr. David Smith, Cairo Utilities Director, none of these five wells have been active since 1990 and all of them are scheduled to be abandoned by June 30, 1998. The city wells mentioned above are shown on the attached "City Well Map"(Attachment B).

IV. Residential and Industrial Wells

Municipal water supply is estimated to have been available for businesses and residences within the search area for at least thirty years. Many of the residences in the search area were constructed in the last thirty years. Therefore, it was SEA's belief that it was highly unlikely that any private well is or was used as of June 29, 1994 for drinking water supply within the search distance. However, SEA conducted a survey of the search area to confirm its conclusion.

A list of addresses within the survey area was extracted from the commercial telephone number database, Select Phone by Pro CD, Inc. The address list included 361 listings. During the survey, occupants of 61 homes and businesses were contacted by telephone. The remaining 300 listings were investigated during the door-to-door survey or during a drive through survey.

From December 10, 1996 through December 12, 1996, a door-to-door and drive-through survey was conducted by walking streets and calling on occupants of residences and businesses and driving through the area located within one mile of the Roddenbery facility along the presumed southwesterly flow path. During the door-to-door survey, 49 persons

were questioned. A table indicating the name, address, and phone number of persons contacted is attached (Attachment D). Those persons contacted by telephone are indicated by a "T" in the "Contacted" column. An "F" indicates that the person was contacted during the door-to-door search and an "FW" indicates that a well was found during the door-to-door survey. Ten wells were located during the door to door and drive through survey. All were large diameter wells that were apparently "hand dug". None of these wells was used as a drinking water supply as of June 29, 1994.

Five of the ten wells located (well numbers 1,2,4,5,10) on the attached chart (Attachment E) were at addresses where contact was made with the resident. Based on information received from these residents or owners, none of these five wells was in use as a drinking water supply on June 29, 1994 or thereafter.

The remaining wells (well numbers 3,6,7,8,9) were located either at vacant homes or the residents were not at home during the survey. While it was impossible to question anyone during the survey, subsequent conversations, as described below, confirm that none of these five wells was in use on June 29, 1994. Well No 3- The owner, Ms. Eloris Blackshire, was contacted by telephone on December 31, 1996. She indicated that the well had not been used for at least five years. Well No. 6 - According to Mr. Smith, the house at 453 Church Street has been connected to the Cairo water system for at least 10 years. Well No. 7 - The house at the southeastern quadrant of Church Street and 4th Avenue, SE is in the estate of Charles Hudson. His grandson, Mr. Henry Hudson, was visited at his College Park home and he indicated that the house has been vacant since at least 1989. Well No. 8 - The house at 256 9th Street is occupied by Ms. Millie Williams. According to Mr. David Smith, Utilities Director for the City of Cairo, Ms. Williams has received a water bill at that address for at least the last eight years. Well No. 9 - The granddaughter of the owner of the home at 109 8th Street, Ms. Dorothy Metcalf, was contacted by telephone and indicated that the well at the property had not been used for at least the past five years.

A list of the ten wells is found on Attachment E. Each well is numbered to correspond to the locations shown on the attached well map (Attachment F). In summary, none of the ten wells located were presently being used. Further, based on the foregoing, we conclude that none of the ten wells was in use on June 29, 1994.

V. Conclusions

It is our opinion that there are no drinking water wells currently in use nor have there been any in use over the past five years in the search area. This is based on the following:

1) The search described above has discovered no wells which have been in use during the past five years.

2) The municipal water supply system is available throughout the area and every private well discovered was at a residence which is currently connected to the

municipal system.

3) Mr. David Smith, Cairo Utilities Director, and Mr. Bob Hopkins, City Manager stated that the survey area has had municipal water available for more than thirty years.

Aerial photographs of the area dated 1973 obtained from the Grady County Tax Assessors office indicate that the homes along Crescent Circle, Madison Lane, and East Washington Drive had not been constructed. It is likely that municipal water supply was available in the area when the houses along these streets were built.

4) Mr. David Smith also stated in a letter dated December 23, 1996, (Attachement C) that the municipal wells that had been in the vicinity of the subject site have not been in use since 1990 and will be abandoned by June 30, 1998.

ssk

5) According to Mr. Earnest Cloud, City Councilman for Cairo the city has a program to close unused wells for residents free of charge.

Should you have any questions regarding this matter, please do not hesitate to contact us.

Respectfully submitted,

SAILORS ENGINEERING ASSOCIATES, INC.

Robert W. Harris, P.G.

Jim D. Sailors, P.E.

SEA

ATTACHMENT A

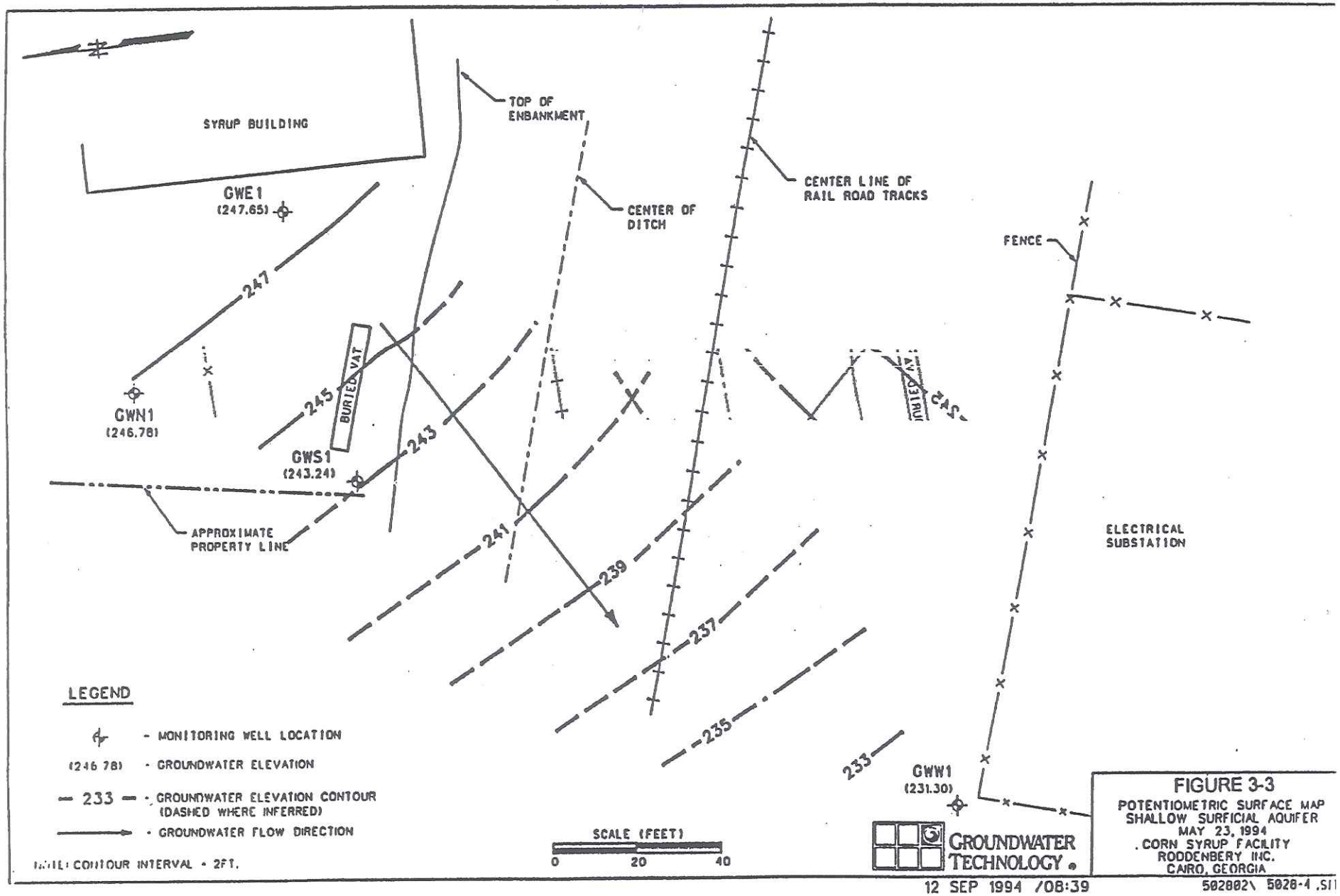


FIGURE 3-3
POTENTIOMETRIC SURFACE MAP
SHALLOW SURFICIAL AQUIFER
MAY 23, 1994
CORN SYRUP FACILITY
RODDENBERY INC.
CAIRO, GEORGIA

12 SEP 1994 /08:39

502802\ 5028-4 .SI

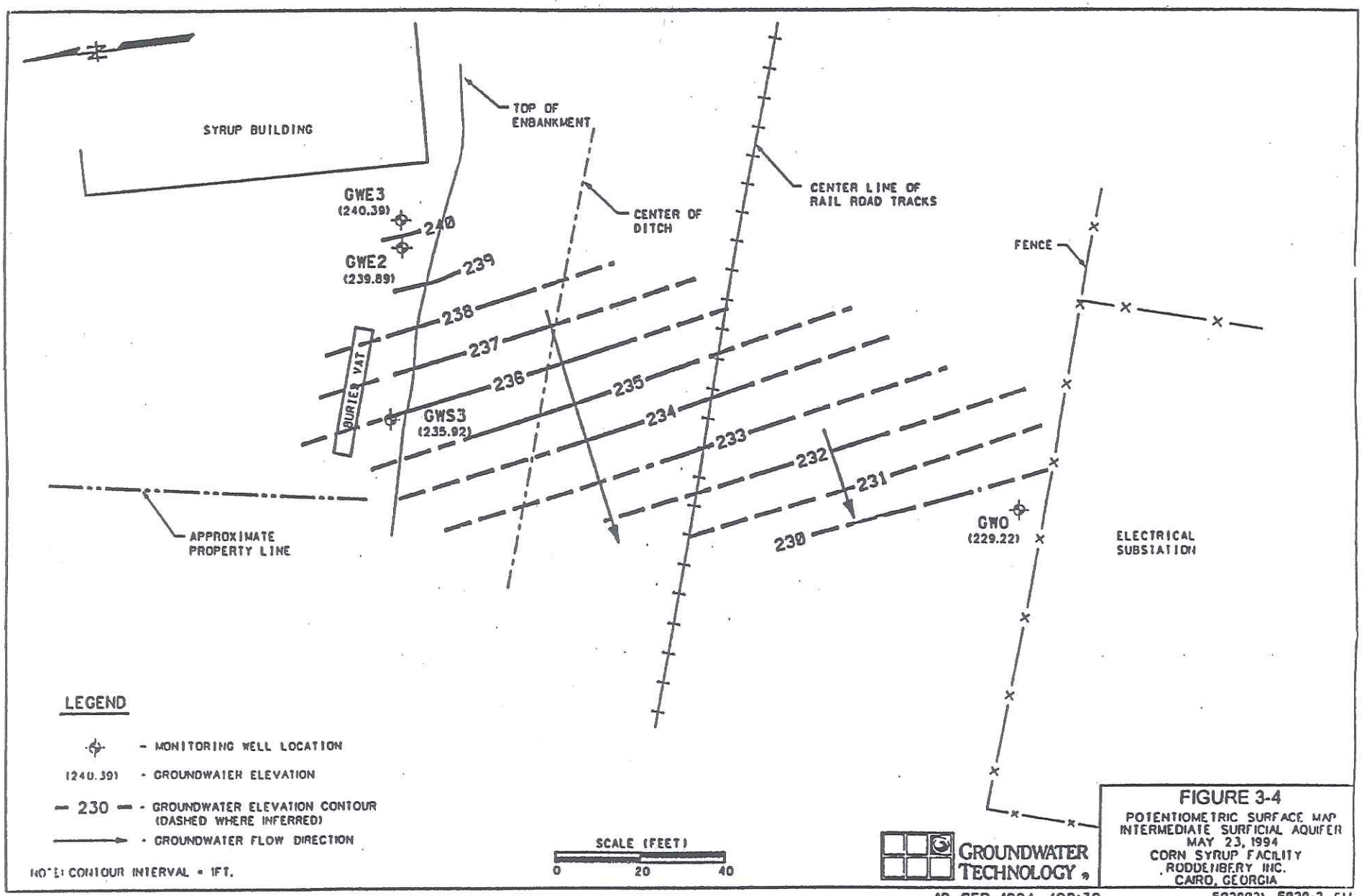
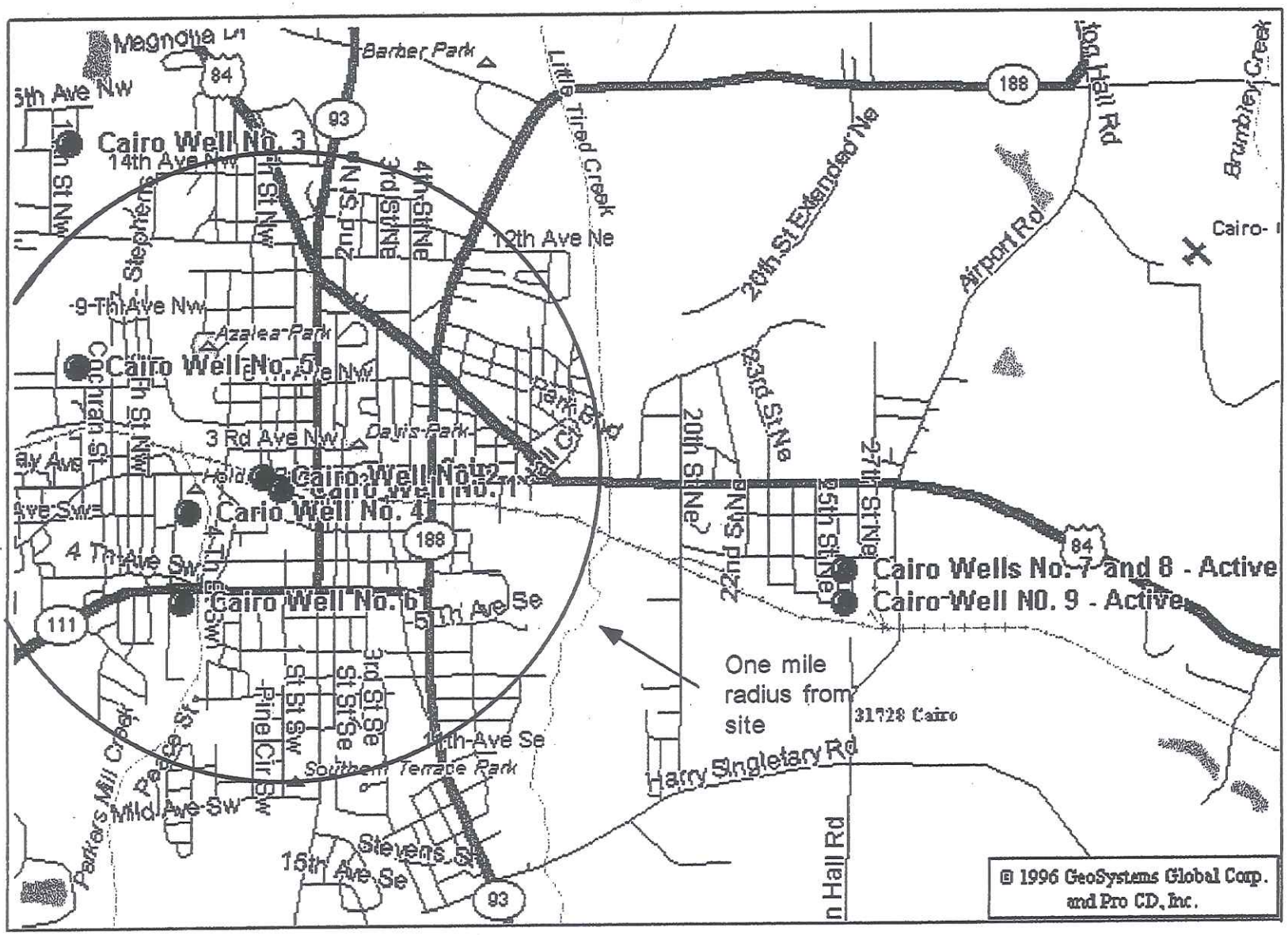


FIGURE 3-4
POTENTIOMETRIC SURFACE MAP
INTERMEDIATE SURFICIAL AQUIFER
MAY 23, 1994
CORN SYRUP FACILITY
RODDENBERRY INC.
CAIRO, GEORGIA

12 SEP 1994 /08:39 502802\ 5028-3 .SII

ATTACHMENT B

City Well Map
Cairo, GA



Inactive/abandoned well

Active well

ATTACHMENT C

CITY OF CAIRO

"Georgia's Hospitality City"

December 23, 1996

Mr. Robert Harris
Sailors Engineering Associates, Inc.
1675 Spectrum Drive
Lawrenceville, Georgia 30243

Dear Mr. Harris:

After considerable review of the files regarding the operations of the six inactive/abandoned wells within the city of Cairo, we have concluded that none of the six wells were in operation after 1990. We cannot determine the exact date of their last operation.

Three of these wells have been abandoned with three remaining to be abandoned. We fully anticipate abandoning the remaining three wells during our next fiscal year which is July 1, 1997 to June 30, 1998.

Please contact me if you have any further questions regarding the city wells.

Sincerely,

David Smith
Utilities Director

cc: City Manager

P.O. Box 29 • Cairo, Georgia 31728 • Phone (912) 377-1722 • Fax (912) 377-9012

ATTACHMENT D

LASTNAME	FIRSTNAME	TELEPHONE	NUMBER	ADDRESS	Contacted	LATITUDE	LONGITUDE
Aaa Storage		912-377-2403	818	1st Ave NE	T	30.87786	-84.22044
Adams	Hattie Mae	912-377-8319	1188	2nd Ave SW	T	30.876	-84.2217
Addison	Elder Ruben	912-377-7827	304	Ridge Ave	T	30.87522	-84.2121
Albright	Louise	912-377-2277	459	3rd St SW	T	30.87204	-84.21384
Andrews	Daisy	912-377-2241	907	4th Ave SW	T	30.87306	-84.2202
Asbell	C E	912-377-4918	113	Pine Cir SW	T	30.86562	-84.2121
Baker	Ora Mae	912-377-2149	300	4th St SW	T	30.87726	-84.21432
Bell	Myrtle	912-377-2180	319	6th St SW	T	30.87384	-84.21702
Blough	Paul L	912-377-8971	100	3rd Ave SW	T	30.87384	-84.21048
Bogan	Edith	912-377-1847	683	Lincoln Ln	T	30.86772	-84.21954
Brown	Bobbie Jean	912-377-8266	125	3rd Ave SW	T	30.87354	-84.21072
Brown	Lumis C Dr Dds Res	912-377-9076	107	3rd Ave SW	T	30.87354	-84.21054
Brown	Mattie	912-377-3542	560	N Washington Dr	T	30.86934	-84.22032
Bryants Garage		912-377-3743	805	1st Ave NE	T	30.87756	-84.2205
Chandler	Annie R	912-377-7436	506	3rd St SW	T	30.86994	-84.21414
Cloud	Sarah B Mrs	912-377-2374	409	7th St SW	T	30.87222	-84.21876
Cooper	R B Rev	912-377-9895	782	Lincoln Ln	T	30.86796	-84.2205
Corker	Clifford	912-377-1578	100	4th Ave SW	T	30.87216	-84.21048
Corker	Emory J	912-377-2168	409	3rd Ave SW	T	30.8736	-84.21414
Flowers	Henry L Jr Rev	912-377-5473	605	7th St SW	T	30.87072	-84.2187
Forrest	King	912-377-6882	125	8th St SW	T	30.8772	-84.21882
Glenn	Teresa	912-377-4937	277	11th St SW	T	30.87492	-84.22122
Griffin	Kenneth	912-377-1849	100	Oriac Ave	T	30.86442	-84.21216
Hadley	Lois	912-377-1869	327	3rd Ave SW	T	30.87354	-84.21294
Hardman	Charles H	912-377-2367	623	N Washington Dr	T	30.86928	-84.22074
Hart	Ralph	912-377-6907	1193	2nd Ave SW	T	30.87576	-84.22158
Hernandez	Pabla M	912-377-7860	205	3rd Ave SW	T	30.87354	-84.21162
Hill	Freddie C	912-377-7300	1265	2nd Ave SW	T	30.87564	-84.22338
Johnson	Jacqueline	912-377-1921	220	Ridge Ave	T	30.87522	-84.21324
Johnson	Phearis Sr	912-377-3740	249	3rd St SW	T	30.87438	-84.21354
Jones	William I	912-377-5792	101	Oriac Ave	T	30.86418	-84.2121
Lee	Winfred	912-377-4977	112	Pine Cir SW	T	30.86562	-84.2124
Lurry	Thomas C	912-377-7567	113	11th St SW	T	30.87708	-84.22164
Maxwell	Lucille	912-377-4189	313	6th St SW	T	30.87384	-84.21702
Mitchell	Reatha Mae	912-377-4036	697	4th Ave SW	T	30.8733	-84.2181
Mobley	Oscar	912-377-4225	487	7th St SW	T	30.87162	-84.2187
Myles	Eva Mae	912-377-6358	624	7th St SW	T	30.8706	-84.21834
Norwood	Beulah	912-377-2166	333	3rd Ave SW	T	30.87354	-84.213
Parramore Pre-Learning Academy		912-377-9776	1293	2nd Ave SW	T	30.87564	-84.22296
Perkins	Robert C	912-377-3794	124	Pine Cir SW	T	30.86592	-84.2124
Powell	L M	912-377-9341	210	3rd Ave SW	T	30.87384	-84.21168
Ray	Frizel	912-377-4216	447	3rd St SW	T	30.87192	-84.21384
Riffle	Randy & Lola	912-377-9811	103	Oriac Ave	T	30.86418	-84.2121
Robinson	Elva Lee	912-377-4355	730	N Washington Dr	T	30.86868	-84.21906

LASTNAME	FIRSTNAME	TELEPHONE	NUMBER	ADDRESS	Contacted	LATITUDE	LONGITUDE
Shepherd	Robert & Frances	912-377-8290	530	N Washington Dr	T	30.86928	-84.2202
Simmons	Perry Rev	912-377-4427	580	N Washington Dr	T	30.8694	-84.22038
Singletary	Rose	912-377-8174	110	4th Ave SW	T	30.87216	-84.2106
Smith	Fred Sr	912-377-2520	143	9th St SW	T	30.8769	-84.21972
Smith	Katie M	912-377-9261	585	N Washington Dr	T	30.86916	-84.22056
Stephens	J D	912-377-3208	630	N Washington Dr	T	30.86952	-84.22062
Stewart	Eimira	912-377-9187	626	Lincoln Ln	T	30.86724	-84.21912
Thomas	Vasco	912-377-4654	107	Pine Cir SW	T	30.8655	-84.2121
Thrower	Howard III	912-377-3493	110	3rd Ave SW	T	30.87384	-84.21054
Varnedoe	Susan	912-377-8056	105	Pine Cir SW	T	30.86544	-84.2121
Watson	Donna	912-377-8972	1314	3rd St SW	T	30.87072	-84.21408
Weston	Cecil	912-377-2177	215	6th St SW	T	30.87456	-84.21702
Westons Funeral Home		912-377-4820	215	6th St SW	T	30.87456	-84.21702
White	H B	912-377-3791	144	Pine Cir SW	T	30.8664	-84.21216
Wilcox	Bobby	912-377-3397	450	7th St SW	T	30.87192	-84.2184
Wooten	Nehemiah Jr & Ann	912-377-6760	118	6th St SW	T	30.87588	-84.21678
Rick's Oster Bar	Rick @		201	Martin Luther King Ave	F	30.8757	-84.2118
Hopkins	J B		309	Martin Luther King Ave	F	30.8759	-84.2122
Jenkins	Rev W R		New Corenth	3rd St SW	F	30.8757	-84.2135
Harrison	Kenneth		409	Martin Luther King Ave	FW	30.8765	-84.2136
Green	Josh		406	Martin Luther King Ave	F	30.8768	-84.2134
Johnson	Ms.		608	Martin Luther King Ave	F	30.877	-84.2136
Mills	Velores		220	Martin Luther King Ave	FW	30.8762	-84.2118
Unknown	Unknown		306	Ridge Ave	F	30.8753	-84.2126
Unknown	Unknown		133	Church St	F	30.8744	-84.2128
Unknown	George		265	4th St SW	F	30.8742	-84.2152
Johns	Linda		279	4th St SW	F	30.8746	-84.215
Unknown	Unknown		406	3rd Ave SW	F	30.8739	-84.2144
James	Unknown		250	3rd St SW	F	30.8744	-84.2136
Cox	Joseph W		515	4th Ave SW	FW	30.8727	-84.2167
Unknown	Serrece		329	3rd Ave SW	F	30.8741	-84.2194
Hardley	Lois		327	3rd Ave SW	F	30.8741	-84.2188
Jones	Carol		282	Church St SW	F	30.8743	-84.2133
Flowers	Unknown		222	3rd Ave SW	F	30.8738	-84.2126
Jackson	Charlie Mae		310	3rd Ave	F	30.8738	-84.2134
Smith	Son in law of Ms.		301	3rd Ave SW	F	30.8737	-84.2141
Williams	Ms.		200	3rd Ave SW	F	30.8739	-84.2116
Brown	Frankie		125	3rd Ave SW	F	30.8735	-84.2106
White	Ms. Ozie		224	Jones St.	F	30.8732	-84.2145
Lowe	Madeline		306	Jones St	F	30.873	-84.2148
Robinson	Barbra		307	3rd St SW	F	30.873	-84.214
Florence	Debra		311	3rd Street	F	30.8728	-84.217
Falkner	Rebecca		312	3rd St SW	FW	30.8727	-84.2141
Jones	Mr.		324	4th Ave SW	F	30.8727	-82.2136

LASTNAME	FIRSTNAME	TELEPHONE	NUMBER	ADDRESS	Contacted	LATITUDE	LONGITUDE
Hill	Raphine		516	4th Ave SW	F	30.873	-84.2163
Williams	Albert		520	4th Ave SW	F	30.8731	-84.2168
Norwood	Ben		No Number	4 th Ave SW	F	30.8731	-84.217
Windy	Joe Anne		607	4th Ave SW	F	30.8732	-84.2178
Lurry	Fred		683	4th Ave SW	F	30.8733	-84.218
Lurry	Jewel		723	4th Ave SW	F	30.873	-84.2184
Hall	Lawrence		301	6st St SW	F	30.8728	-84.2173
Bowen	Ruby Dean		643	6th St SW	F	30.8687	-84.2174
Bell	Ms.		219	6th St SW	F	30.8747	-84.21168
Paris	Mr.		640 - 644	2nd Ave. SW	F	30.8759	-84.2187
Copeland	Anne		219	Teresa Edwards St	F	30.8749	-84.218
unknown	Felecia		578	6th St SW	F	30.8692	-84.2177
Hudson	Horace		564	6th St Sw	F	30.8695	-84.2178
Tayler	Raymond		562	6th St SW	F	30.87	-84.2178
unknown	Barbara		552	6th St SW	F	30.8704	-84.2178
Williams	Mr.		412	6th St Sw	F	30.8718	-84.2175
Johnson	Chriseen		603	Calvary Rd	F	30.8724	-84.2177
King	Mr.		125	8th St SW	F	30.8768	-84.2189
E.J.D. Inc.	Betty Rawls @	912-377-1442		1st Ave SW	T	30.8777	-84.2125
Wilson	Elmer		530	4th Ave SW	F	30.8733	-84.2169
Blackshire	Deloris	912-377-7900	NW Quadrant	3rd St and Ridge Ave.	FW, T	30.8741	-84.2134

ATTACHMENT E

ATTACHMENT E

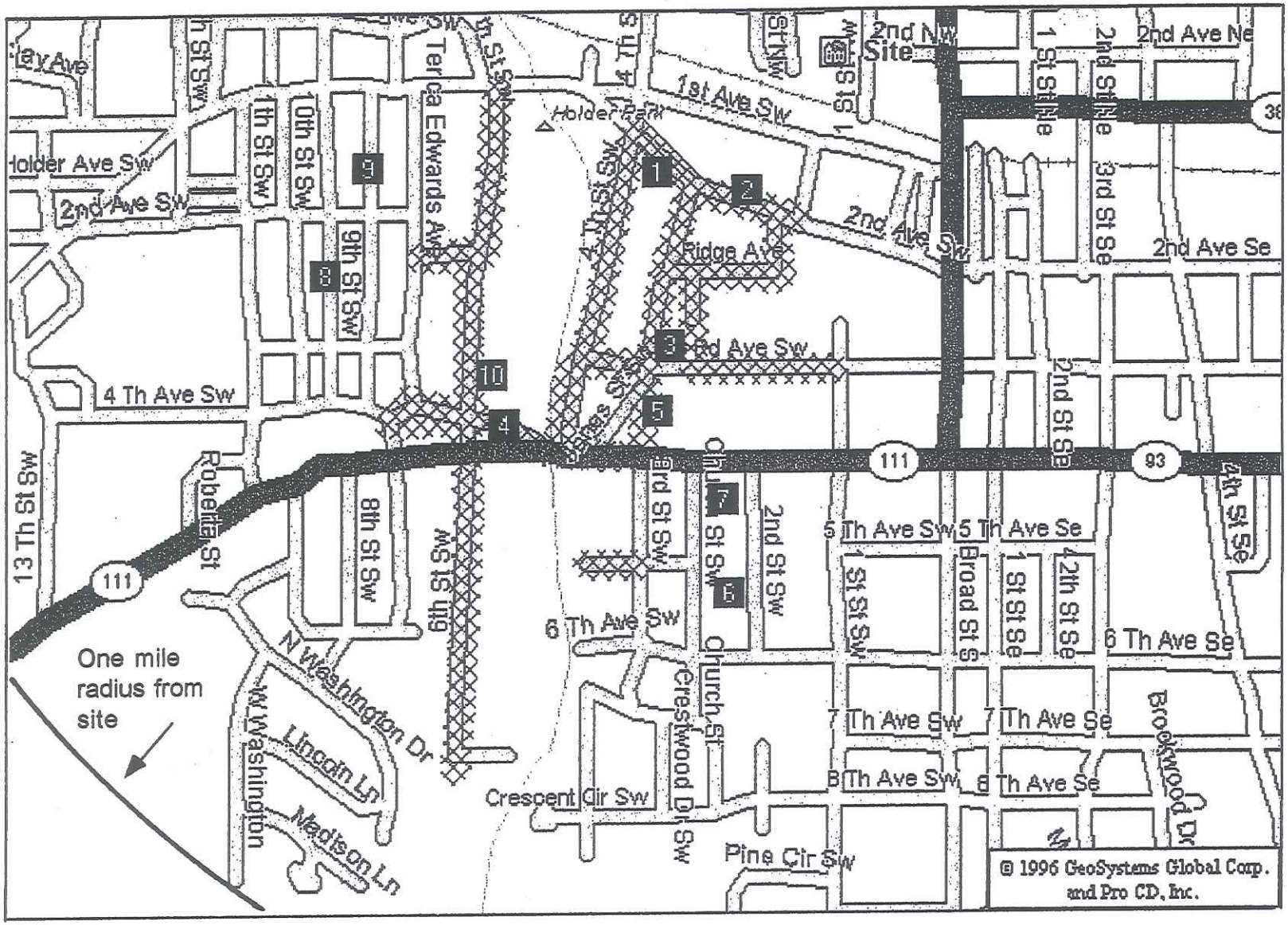
WELL NO.	ADDRESS	DESCRIPTION	CONTACT
1	409 Martin Luther King Ave.	Large diameter (24 inch) well cased with terra-cotta pipe. Exact depth unknown. **According to David Smith, Cairo Utilities Director, the house has been connected to the municipal supply for at least 10 years and probably longer but records can only substantiate 10 years because municipal records are not available for years preceding 1986-87.**	Contact was made with resident, Kenneth Harrison, who stated well is not in use.
2	220 Martin Luther King Ave.	Large diameter well reported under house. Exact depth unknown. **Well not used for at least 12 years. House is on municipal supply.**	Contact was made with Velores Mills, who stated well not used for at least 12 years.
3	NE quadrant of 3rd Street and Ridge Avenue. House faces Ridge Ave.	Large diameter (36 inch) well cased with terra-cotta pipe under well cover. Exact depth unknown. The house was vacant. According to the owner, Ms. Eloris Blackshire, **the well has not been used for at least 5 years and the house is connected to the municipal supply.**	Contact was make with owner Eloris Blackshire, who stated well has not been used for at least 5 years.
4	515 4th Ave. SW	Large diameter well. Exact depth unknown. **Well not used for at least 12 years. The home is connected to the municipal water supply.**	Contact was made with owner Joseph W. Cox who stated well has not been used for at least 12 years.
5	312 3rd Street SW	Large diameter well near house. Approximately 15 feet deep. **Owner said that well had not been used for at least five years. The home is connected to the municipal water supply.**	Contact was made with owner Rebecca Falkner who stated well has not been used for at least 5 years.

6	453 Church Street	Large diameter well. Exact depth unknown. The well contained no piping or pump. **House was vacant. Water meter was present indicating that the house is connected to the municipal supply. According to David Smith, Cairo Utilities Director, the house has been connected to the municipal supply for at least 10 years and probably longer but records can only substantiate 10 years because municipal records are not available for years preceding 1986-87.**	Contact was made with David Smith, City of Cairo, because house was vacant
7	SE quadrant of Church Street and 4th Ave. SE	Large diameter well. Exact depth unknown. **No evidence of use. House was vacant. Water meter was present indicating that the house is connected to the municipal supply. The grandson of the home owner said that the house has been vacant for the past eight years.**	Contact was made with henry Hudson, grandson of absentee owner who stated no one had lived in house for eight years and had no knowledge of well use.
8	246 9th Street SW	Large diameter well. Exact depth unknown. Brick well curbing covered by concrete slab. **No evidence of use. Pulley for hand drawing water still in place. Water meter was present indicating that the house is connected to the municipal supply. Cairo utilities director indicated that this address had received a water bill for at least the past eight years.**	Contact was made with David Smith, City of Cairo resident not located.

9	109 8th Street SW	Large diameter well. Exact depth unknown. Hand dug and uncased. **No evidence of use. Water meter was present indicating that the house is connected to the municipal supply. According to the records of the City of Cairo Utilities Department, the water meter was installed in 1993.**	Contact was made with David Smith, City of Cairo because resident not located.
10	530 4th Ave.	Large diameter (36 inch) well. Exact depth unknown. **Well not in use. Resident stated well had not been used for at least 10 years. The house was connected to the municipal supply.**	Contact was made with resident Elmer Wilson who stated well had not been used for at least ten years.

ATTACHMENT F

Drinking Water Well Survey
Cairo, GA



Location of unused drinking water wells 5 Hatched streets were searched door to door

Attachment B

Revised RQSM Explanation - Ground Water Pathway

The following is an explanation of the attached RQSM score sheet (Attachment C) including the rationale for selecting the proper variables in the RQSM equation:

A. Has a release occurred?

Based on the detection of pentachlorophenol at a concentration above background in a ground water sample obtained from the Site, a known release of pentachlorophenol has been selected for purposes of RQSM scoring. The value of 45 is the same input parameter as that used by EPD in its original scoring.

B. Route Characteristics

Not applicable (same as EPD).

C. Containment

Not applicable (same as EPD).

D. Release Characteristics

1d. The regulated substance is pentachlorophenol. This is the same input as found in EPD's original scoring of the site.

2d. The toxicity of pentachlorophenol is listed as a value of 4 in the RQSM guidance. This is automatically specified in the RQSM scoring process and is the same input as EPD.

3d. The quantity of pentachlorophenol, if any, released is unknown, resulting in a value of 4 (same input as EPD).

E. Targets

1e. Exposure to ground water release.

For purposes of RQSM scoring, the pentachlorophenol has been classified as a known release to ground water at a concentration greater than the MCL, with no human exposure suspected, resulting in a value of 4 (same input as EPD).

2e. Distance to drinking water well or spring.

As provided in the RQSM guidance, "the distance to the well or spring is measured as the shortest distance, along the presumed flowpath, from a known location of the regulated substance to a well or spring that is used as a drinking water supply." Based on site-specific hydrogeological data as of June 29, 1994, no drinking water wells existed within (at least) one mile of the Site along the known southwesterly ground water flowpath. EPD used an assumed nearest distance to a drinking water well or spring to be between 0.5 to 1 mile, resulting in a value of 9. As there is no evidence of a drinking water well within one mile of the Site along the known ground water flowpath at the time of the original scoring of the Site, the correct maximum input value is 4. It should be noted that as the well survey did not extend past one mile, information was not obtained as to the presence or absence of drinking water wells over one mile from the Site. Based on available information, it is probable that no drinking water wells would be found over one mile from the Site within the city limits. Nevertheless, we are willing to use a conservative input value of 4.

Ground Water Pathway Score

Based on the information provided above, the RQSM Score for the release of pentachlorophenol to ground water is 6.50. This value is below the RQSM threshold for a release of reportable quantity to ground water

GROUND WATER

A. HAS A RELEASE TO GROUND WATER OCCURRED? (Known (45)) Suspected (10) Potential Future (5)

If A=45, then go to D

B. ROUTE CHARACTERISTICS

1b. Susceptibility Rating: Higher (6) Average (3) Lower (0) NA

2b. Physical State: Stable Solid (0) Unstable Solid (1) Powder, Ash (2) Liquid, Gas, Sludge (3) NA

C. CONTAINMENT Very Good (0) Good (1) Fair (2) Poor (3)

D. RELEASE CHARACTERISTICS

1d. Regulated Substance: Pentachlorophenol

2d. Toxicity: None (0) Low (1) (2) (4) (8) (16) High

3d. Quantity: Threshold (1) (2) (3) (4) (5) (6) (7) (8) Very Large

E. TARGETS

1e. Exposure to ground water release:

Known release ≥ MCL, and known human exposure ≥ MCL ..... (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 < MCL ..... (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 suspected ... (3)
Suspected release but no human exposure suspected ..... (2)
Potential future release ..... (1)
Known release less than MCL ..... (0)

(only one choice allowed)

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)

GEORGIA ENVIRONMENTAL PROTECTION DIVISION

REPORTABLE QUANTITIES SCREENING METHOD

FOR

W.B. Roddenbery Syrup Plant
(Name of Site)

Cairo, Georgia
(City) (State)

SCORED BY: _____ ON: _____

		Threshold
GROUND WATER PATHWAY SCORE	(6.5)	10
ON-SITE PATHWAY SCORE	(NA)	20

SUMMARY OF SCORING JUSTIFICATIONS:

Appendix C

Georgia Department of Natural Resources

205 Butler Street, S.E., Suite 1462, Atlanta, Georgia 30334
Lonice C. Barrett, Commissioner
Environmental Protection Division
Harold F. Reheis, Director
404/657-8600

August 29, 1997

Ms.Susan Hearne-Richardson
Kilpatrick Stockton LLP
1100 Peachtree Street
Suite 2800
Atlanta, Georgia 30309-4530

Re: Reevaluation of Notification Scoring
W. B. Roddenbery Syrup Plant (HSI# 10213)

Dear Ms. Hearne-Richardson:

A review of the notification data for this site, including the additional data submitted with your letters dated February 14, 1997 and May 23, 1997, by the Environmental Protection Division (EPD) has been completed and a summary of our findings is given below.

The W. B. Roddenbery Syrup Plant was listed on the Hazardous Sites Inventory (HSI) on June 29, 1994 for a groundwater release of pentachlorophenol exceeding the Maximum Contaminant Level. When the site was originally evaluated using the Reportable Quantities Screening Method (RQSM), the groundwater pathway score was based on the existence of drinking water wells within one mile of the site. The well survey results, submitted February 14, 1997, and a well search conducted by EPD staff did not identify any drinking water wells within one mile of the site. Therefore, the updated RQSM groundwater pathway score does not exceed the RSQM threshold score.

The original notification indicated the presence of pentachlorophenol in soil was "unknown." Therefore the on-site RQSM pathway score, based on a suspected release of pentachlorophenol, was below the RSQM threshold score. Soil removals which occurred in March 1995 resulted in soil concentrations of pentachlorophenol below 3.5 mg/kg (at a depth of four feet) but above the notification concentration of 3.30 mg/kg. Moreover, we can not concur that the site has limited access and consequently the revised on-site pathway score is above the RSQM on-site pathway threshold score.

EPD has concluded, based on the revised on-site pathway RSQM score, that a release exceeding a reportable quantity did exist at the above referenced site on June 29, 1994, the date of listing on the Hazardous Site Inventory (HSI), and consequently your request for removal of the site from the HSI is denied.

If you have any questions, please contact John Hetrick at 404-657-8600.

Sincerely,

Alexandra Y. Cleary

Alexandra Y. Cleary
Unit Coordinator
Hazardous Sites Response Program

File: HSI Number 10213
R:\JOHNH\RODDENBE\RODDENBR.LTR

Site No.: 10213 Site Name: W. B. Roddenbery Syrup Plant

08/29/97 09:06:12

Location: 301 First Avenue
Cairo Lat 30 ° 52 ' 41 " N Lon 84 ° 12 ' 37 " W
County: Grady 31728
Parcel ID:

Property Owner: W. B. Roddenbery Company, Inc
17 First Avenue NE
Cairo , GA 31728
Phone: (912) 377-2102

Contact Person: Julien Roddenberry
Agent
W. B. Roddenbery Company, Inc
P.O. Box 60
Cairo , GA 31728
Phone:

Facility ow/op:

W. B Roddenbery Company, Inc
17 First Avenue NE
Cairo , GA 31728
Phone: (912) 377-2102

EPA ID:
Entered HSI Database on : 05/18/94
Corrective Action Site Class: 2 Cleanup Code: 1

OUTPUT FROM REPORTABLE QUANTITIES SCREENING METHOD

GROUNDWATER PATHWAY ***Pathway Score: 6.50***

A. Known (45), Suspected (10), or Pot. Future (5): 45
1B.Higher (6), Average (3), or Lower (0) Susceptibility: 0
2B. Physical State [stable solid=0; liquid=3]: 0
C. Containment [very good=0; poor=3]: 0

SUBSTANCE: (CAS: 87865) Pentachlorophenol
2D. Toxicity: 4 3D. Quantity: 4 - unknown

1E. Exposure: 4 (If 1E>4 then 2E=16)
2E. Distance to well or spring: 4 (If 1E=0 then 2E=1)

ON-SITE EXPOSURE PATHWAY ***Pathway Score: 28.64***

A. Access [none=0; unlimited=4]: 4
B. Known (25), suspected (15), or no known (0) release: 25
C. Quality of containment [very good=0; poor=5]: 4

SUBSTANCE: (CAS: 87865) Pentachlorophenol
2D. Toxicity: 4 3D. Quantity: 4 - Unknown

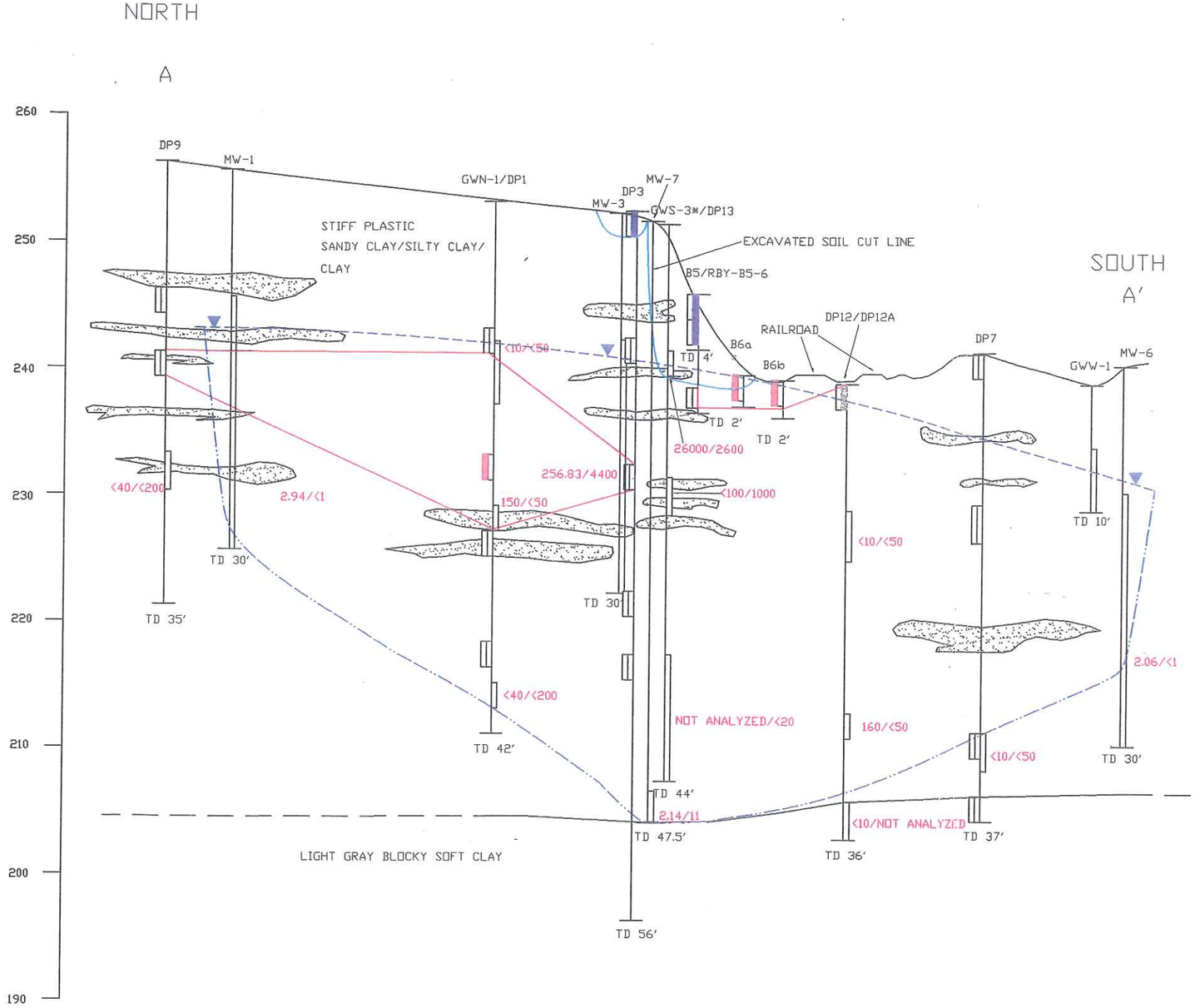
1E. Distance to resident [<300'=8; >1mile=1]: 8
2E. Sensitive Environment affected [yes=1]: 0

OTHER SUBSTANCES:

Grndwat	Soil	Substance
No other substances		

NORTH

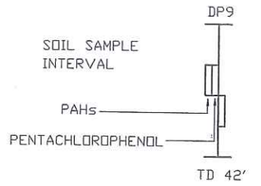
A



SOUTH

A'

LEGEND



GROUNDWATER SAMPLE INTERVAL

TOTAL DEPTH (IN FEET BELOW GROUND SURFACE)

DETECTABLE CONCENTRATION OF PAHs IN SOIL

DETECTABLE CONCENTRATION OF PENTACHLOROPHENOL IN SOIL

NOT ANALYZED IN SOIL

NOT DETECTED IN SOIL

106/93 — TOTAL PAH/PENTACHLOROPHENOL IN GROUNDWATER (IN µg/L)

SANDY/CLAYEY SAND (INTERVAL ESTIMATED)

* — ANALYZED BY GTI

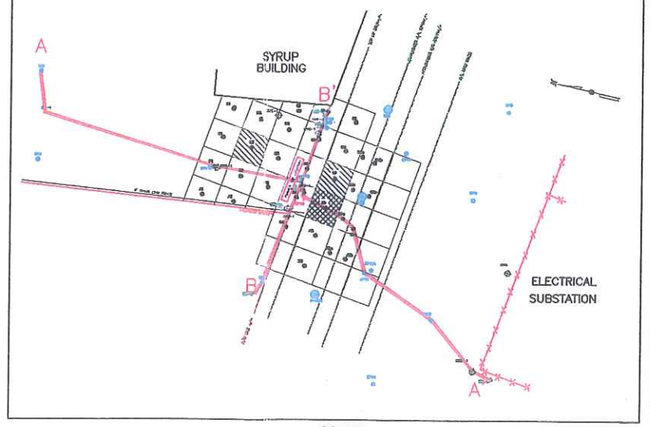
SOILS EXCEEDING BACKGROUND

GROUNDWATER EXCEEDING BACKGROUND

TOP OF GROUNDWATER (2/12/99)

GEOLOGIC CONTACT

INSET



SCALE

VERTICAL 1" = 10'

HORIZONTAL 1" = 50'

WILLIAMS ENGINEERING, INC.
A Williams Group International Company
500 Chase Park South, Suite 150 Birmingham, Alabama

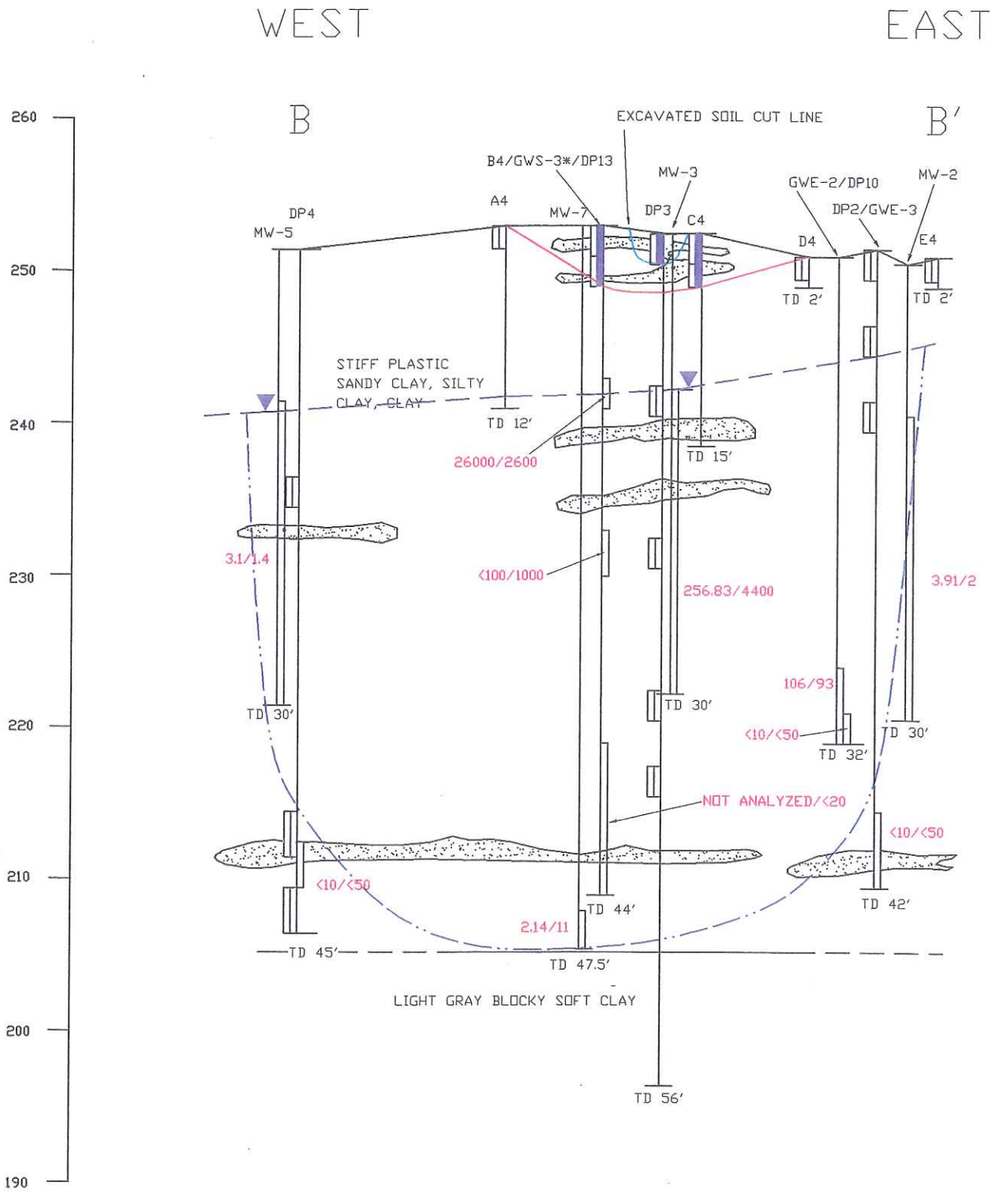
CROSS SECTION A-A'

RODDENBERY SYRUP PLANT
CAIRO, GEORGIA

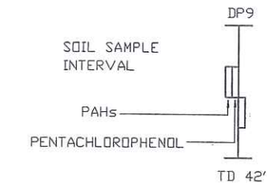
ENGINEERS' SEAL

DRAWN	TCM
PROJECT	1682-0020
DATE	02/28/99
APPROVED	
CHECKED	
FIGURE	3.1

J:\FILES\THOMAS\DRAWINGS\1682\0011\SHEET-3.1.DWG



LEGEND



GROUNDWATER SAMPLE INTERVAL

TOTAL DEPTH (IN FEET BELOW GROUND SURFACE)

DETECTABLE CONCENTRATION OF PAHs IN SOIL

DETECTABLE CONCENTRATION OF PENTACHLOROPHENOL IN SOIL

NOT ANALYZED IN SOIL

NOT DETECTED IN SOIL

106/93 — TOTAL PAH/PENTACHLOROPHENOL IN GROUNDWATER (IN µg/L)

SANDY/CLAYEY SAND (INTERVAL ESTIMATED)

* — ANALYZED BY GTI

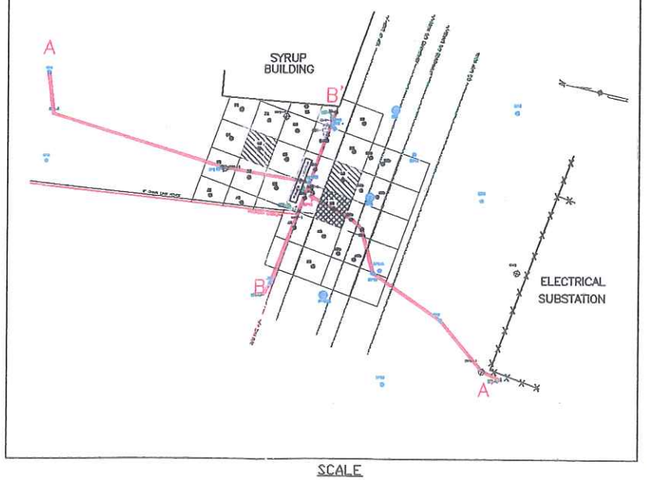
SOILS EXCEEDING BACKGROUND

GROUNDWATER EXCEEDING BACKGROUND

TOP OF GROUNDWATER (2/12/99)

GEOLOGIC CONTACT

INSET



SCALE

VERTICAL 1" = 10'

HORIZONTAL 1" = 50'

WILLIAMS ENGINEERING, INC.
A Williams Group International Company
500 Chase Park South, Suite 150 Birmingham, Alabama

CROSS SECTION B-B'

RODDENBERY SYRUP PLANT
CAIRO, GEORGIA

ENGINEERS' SEAL

DRAWN	TCM
PROJECT	1682-0010
DATE	02/28/99
APPROVED	
CHECKED	
FIGURE	3.2

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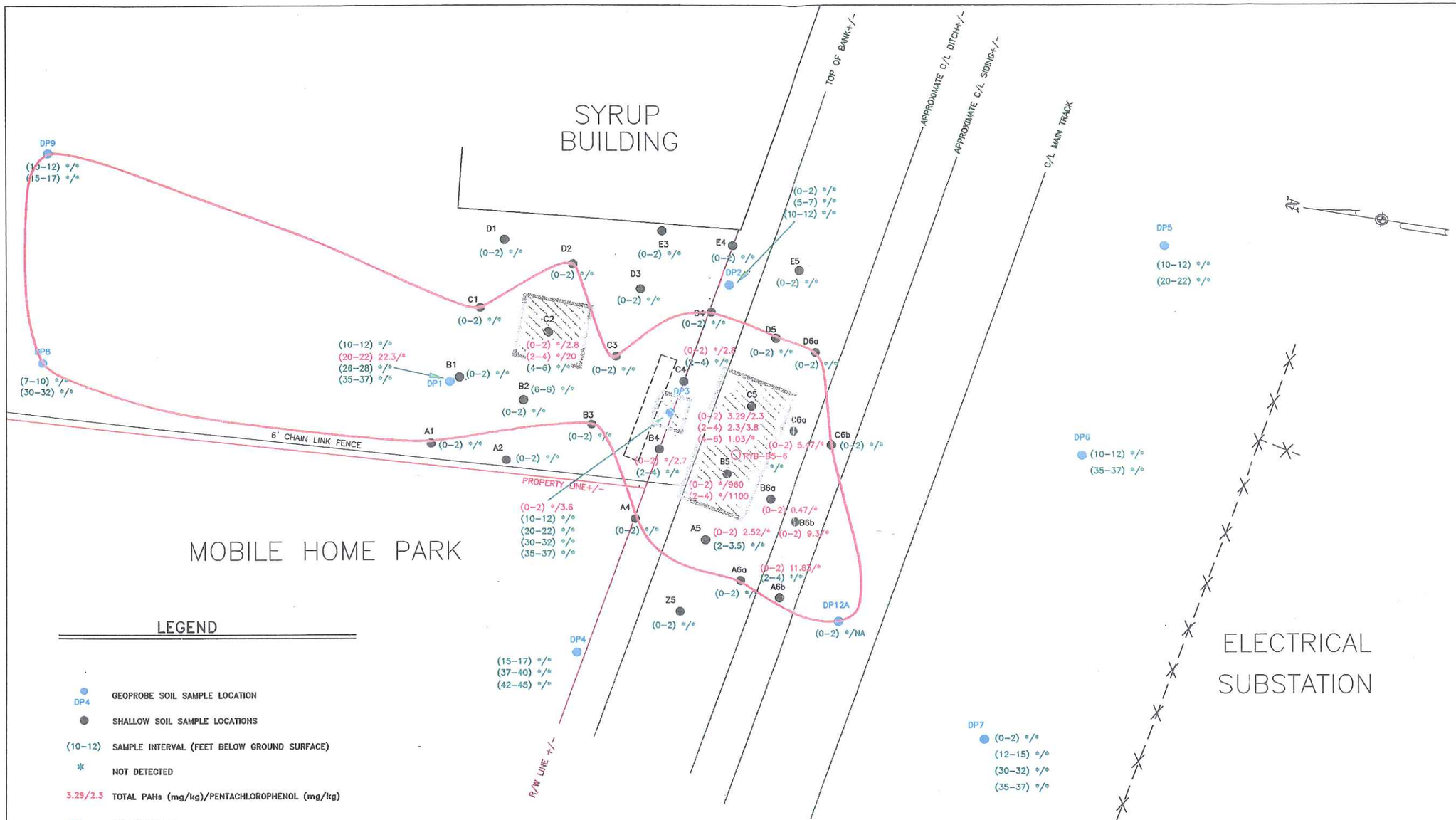


LEGEND

- DP4 — GEOPROBE SOIL SAMPLE LOCATION
- SHALLOW SOIL SAMPLE LOCATIONS
- (10–12) — SAMPLE INTERVAL (FEET BELOW GROUND SURFACE)
- * — NOT DETECTED
- 3.29/2.3 — TOTAL PAHs (mg/kg)/PENTACHLOROPHENOL (mg/kg)
- NA — NOT ANALYZED
- EXTENT OF DETECTABLE COI
- AREA WHERE SOIL WAS REMOVED (FOLLOWING INVESTIGATION) TO CONCENTRATIONS BELOW TYPE 1 RRS.
- CONFIRMATORY SOIL SAMPLE (COLLECTED FOLLOWING EXCAVATION)

WILLIAMS ENGINEERING, INC.
A Williams Group International Company
500 Chase Park South, Suite 150 Birmingham, Alabama

PAHs AND PENTACHLOROPHENOL IN SOILS

RODDENBERY SYRUP PLANT
CAIRO, GEORGIA

ENGINEERS' SEAL

DRAWN	TCM
PROJECT	1682-0020
DATE	11/17/98
APPROVED	
CHECKED	
FIGURE	4.2

A:\FILES\THOMAS\DRAWINGS\1682\0020\FIG4-2.DWG

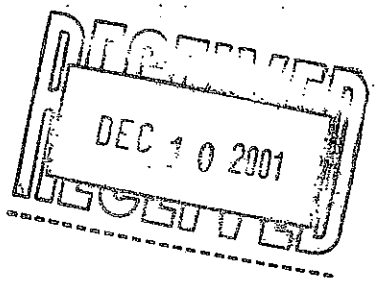
1682-0100

Georgia Department of Natural Resources

205 Butler St. S.E., Floyd Towers, East, Suite 1462, Atlanta, Georgia 30334
Lonice C. Barrett, Commissioner
Environmental Protection Division
Harold F. Reheis, Director
Hazardous Waste Management Branch
404/657-8600

COPY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED



December 7, 2001

Ms. Rebecca R. Cline
W.B. Roddenbery Co., Inc.
149 Parallel Drive, NW
Cairo, Georgia 31728

Re: W. B. Roddenbery Syrup Plant (HSI# 10213)

Dear Ms. Cline:

The Environmental Protection Division (EPD) has reviewed the Source Removal Report for the W.B. Roddenbery Syrup Plant site, dated November 30, 2001. EPD concurs that the soil removal has remediated the soil to the Type 1 Risk Reduction Standards.

Groundwater in the immediate vicinity of the removed soil shows a decrease in detected pentachlorophenol (PCP) and poly aromatic hydrocarbons (PAHs); however, naphthalene appears to be spreading down gradient across the site and was detected for the first time in MW-5 and MW-8. EPD agrees to continue with the monitoring as planned at this time; however, should naphthalene continue to spread, new monitoring wells may need to be installed to complete delineation of the site.

EPD has approved the revised schedule located in Appendix F of the Source Removal Report, and the second Post-Removal Monitoring Report is due by no later than January 7, 2002.

If you have any questions concerning these matters, please call Kelly Norwood of EPD's Hazardous Sites Response Program at (404) 657-8600.

Sincerely,

Alexandra Y Cleary

Alexandra Y. Cleary
Unit Coordinator
Hazardous Sites Response Program

cc: Rodney D. Hames, Williams Environmental Services, Inc.

File: HSI #10213

S:\RDRIVE\KELLY\SITES\RODDENBE\12-7-01soil removal.LTR.doc

Table 1
Roddenbery Site
Monitoring Well Data
Soil Confirmation

Parameter			Analytical Result (mg/kg)												
HSRA ORGANIC CONSTITUENTS	Analytical Method	Type I RRS (mg/kg)	S#1	S#2	S#3	S#4	S#5	S#6	S#7	S#8	S#9	S#10	S#11	S#12 (1)	S#13 (1)
Acenaphthene	SW8270C	300.0	<0.33	<0.33	<0.33	1.7	<0.33	<0.33	0.38	<0.33	<0.33	<0.33	0.99	<0.33	<0.33
Acenaphthylene	SW8270C	130.0	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33
Anthracene	SW8270C	500.0	<0.33	<0.33	0.36	1.2	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	0.65	<0.33	<0.33
Benz(a)anthracene	SW8270C	5.0	<0.33	<0.33	<0.33	0.43	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33
Benzo(a)pyrene	SW8270C	1.64	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33
Benzo(b)fluorantene	SW8270C	5.0	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33
Benzo(g,h,i)perylene	SW8270C	5.0	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33
Benzo(k)fluoranthene	SW8270C	5.0	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33
Chrysene	SW8270C	5.0	<0.33	<0.33	<0.33	0.4	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33
Dibenzo(a,h)anthracene	SW8270C	2.0	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33
Fluoranthene	SW8270C	500.0	<0.33	<0.33	0.37	2.6	<0.33	<0.33	0.41	<0.33	<0.33	<0.33	1.6	<0.33	<0.33
Fluorene	SW8270C	360.0	<0.33	<0.33	<0.33	2	<0.33	<0.33	0.38	<0.33	<0.33	<0.33	1.1	<0.33	<0.33
Indeno(1,2,3-cd)pyrene	SW8270C	5.0	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33
Naphthalene	SW8270C	100.0	<0.100	<0.100	2.3	0.88	<0.100	<0.100	0.31	<0.100	<0.100	<0.100	0.61	<0.100	<0.100
Pentachlorophenol	SW8270C	3.3	1.1	1.5	140	24	0.39	0.14	2.6	0.84	0.26	0.36	3.4	0.2	0.55
Phenanthrene	SW8270C	110.0	<0.33	<0.33	3.4	<6.6	<0.33	<0.33	0.93	<0.33	0.62	<0.33	3.4	<0.33	<0.33
Pyrene	SW8270C	500.0	<0.33	<0.33	<0.33	1.7	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	1	<0.33	<0.33

Notes:

(1) Samples results are from the resampling after the confirmation samples were still above the Type 1 RRS for Pentachlorophenol..

SYRUP BUILDING

MOBILE HOME PARK

ELECTRICAL SUBSTATION

DP9
MW-1
(<1/2.94/2.94)
GWE-1
MW-2
(2/3.91/5.91)
GWE-3
DP10
GWE-2
RUSTED PIPE
WHITE PVC PIPE
TOP OF BANK+/-
APPROXIMATE C/L DITCH+/-
APPROXIMATE C/L SIDING+/-
C/L MAIN TRACK
DP5
DP8
DP1
GWN-1
DP11
FORMER VAT LOCATION
MW-3
(A400/400.83/4800.83)
(11/2.14/13.14)
MW-7
GWS-3
DP13
6' CHAIN LINK FENCE
(400/833.9/1233.9)
MW-4
PROPERTY LINE+/-
GWS-1
DP6
DP4
MW-5
(1.4/3.1/4.5)
R/W LINE +/-
DP12A
DP12
GWO
DP7
GWW-1
(5-10) */=
MW-6
(<1/2.06/2.06)
DP14
(26-28) */NA

LEGEND

MW-2 △	CSI GROUNDWATER MONITORING WELL AND IDENTIFICATION NUMBER
GWW-1 ⊕	ABANDONED GROUNDWATER MONITORING WELL LOCATION WITH IDENTIFICATION
(<1/2.4/2.4)	PENTACHLOROPHENOL/TOTAL PAH/TOTAL COI CONCENTRATIONS IN GROUNDWATER (ug/L)
——	LESS THAN BACKGROUND ISOCONCENTRATION LINE FOR TOTAL COI CONCENTRATION IN GROUNDWATER (ug/L) CONTOUR INTERVAL
DP4 ●	DPT GROUNDWATER SAMPLE LOCATION

NOTE:

THE PENTACHLORPHENOL CONCENTRATION IN GROUNDWATER DETECTED AT MW-7 WAS NOT USED TO CONSTRUCT THE PENTACHLORPHENOL ISOCONCENTRATION MAP.

30 15 0 30 60

SCALE IN FEET

WILLIAMS ENGINEERING, INC.
A Williams Group International Company
500 Chase Park South, Suite 150 Birmingham, Alabama

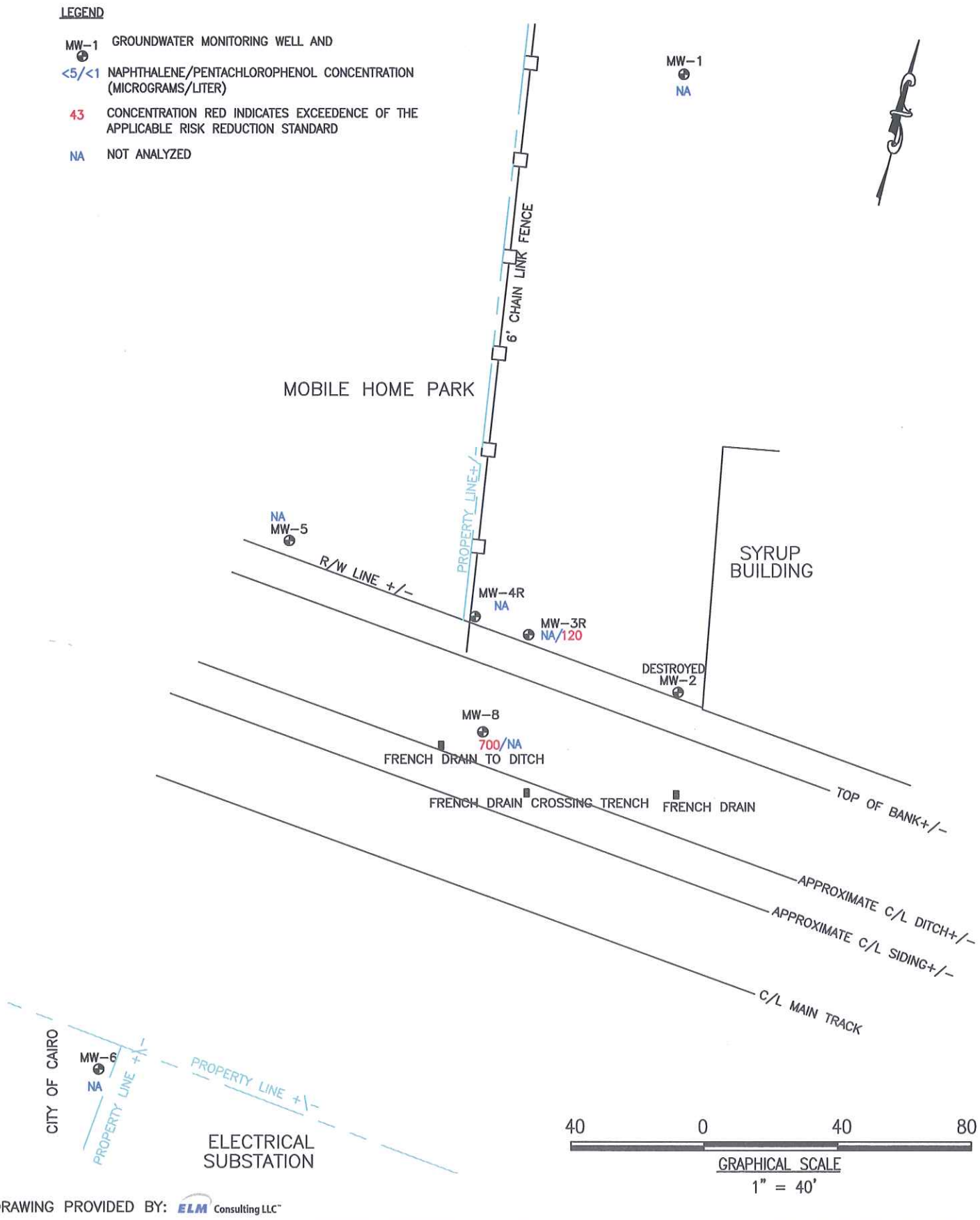
TOTAL COI IN GROUNDWATER
ISOCONCENTRATION MAP (DECEMBER 1998)

RODDENBERY SYRUP PLANT
CAIRO, GEORGIA

ENGINEERS' SEAL

DRAWN	TCM
PROJECT	1682-0020
DATE	02/23/99
APPROVED	
CHECKED	
FIGURE	5.3

A:\FILES\FIGURES\DRAWINGS\1682\0020\FIGURES_4.DWG



DRAWING PROVIDED BY: ELM Consulting LLC

Gallet
A Terracon COMPANY

PROJECT
ANNUAL COMPLIANCE MONITORING REPORT
JANUARY 1, 2009 THROUGH DECEMBER 31, 2009
RODDENBERY SYRUP PLANT
CAIRO, GRADY COUNTY, GEORGIA
PROJECT NO.: E1077004

FIGURE 4
CONSTITUENTS OF INTEREST
CONCENTRATIONS IN GROUNDWATER
DECEMBER 16, 2009

SCALE 1"=40'

Table 3
Summary of Historical Analytical Results
Roddenbery Site
Cairo, Georgia

Site COI	Sampling Date	Approximate Collection Depth (feet)	Test Method	Method Detection Limit	Type 1 RRS	Type 2 RRS	Resulting Concentration	
MW-2								
Volatiles:								
Naphthalene	9/24/2001	19	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	11/19/2001	19	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	12/12/2001	19	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	1/28/2002	19	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	8/1/2002	19	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	10/10/2002	19	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	7/23/2003	19	SW8260	5 µg/L	20 µg/L	--	<5	µg/L
	9/29/2003	19	SW8260	5 µg/L	20 µg/L	--	<5	µg/L
	11/24/2003	19	SW8260	5 µg/L	20 µg/L	--	<5	µg/L
	12/30/2008	19	SW8260	5 µg/L	20 µg/L	--	<5	µg/L
Semi-Volatiles:								
Pentachlorophenol	9/24/2001	19	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	11/19/2001	19	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	12/12/2001	19	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	1/28/2002	19	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	8/1/2002	19	SW8270C	7.70 µg/L	--	7 µg/L	<7.70	µg/L
	10/10/2002	19	SW8270C	7.70 µg/L	--	7 µg/L	<7.70	µg/L
	7/23/2003	19	SW8270C	12 µg/L	--	7 µg/L	<12	µg/L
	9/29/2003	19	SW8270C	10 µg/L	--	7 µg/L	<10	µg/L
	11/24/2003	19	SW8270C	2.2 µg/L	--	7 µg/L	<2.2	µg/L
	5/11/2004	19	SW8270C	2.2 µg/L	--	7 µg/L	<2.2	µg/L
	12/30/2008	19	SW8270C	1 µg/L	--	7 µg/L	<1	µg/L
Metals:								
Boron	7/23/2003	19	6010	0.01 mg/L	--	--	<0.01	mg/L
	9/29/2003	19	6010	0.01 mg/L	--	--	<0.01	mg/L
	11/24/2003	19	6010	0.01 mg/L	--	--	0.012	mg/L
	2/16/2005	19	6010	0.01 mg/L	--	--	<0.01	mg/L
	11/8/2006	19	6010	0.01 mg/L	--	--	22	mg/L
Copper	7/23/2003	19	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	9/29/2003	19	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	11/24/2003	19	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	5/11/2004	19	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	2/16/2005	19	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	11/8/2006	19	6010	0.005 mg/L	1.3 mg/L	--	<0.005	mg/L
Iron	7/23/2003	19	6010	0.05 mg/L	--	--	0.11	mg/L
	9/29/2003	19	6010	0.05 mg/L	--	--	<0.06	mg/L
	11/24/2003	19	6010	0.05 mg/L	--	--	0.08	mg/L
	5/11/2004	19	6010	0.05 mg/L	--	--	0.074	mg/L
	2/16/2005	19	6010	0.05 mg/L	--	--	<0.05	mg/L
	11/8/2006	19	6010	0.05 mg/L	--	--	0.074	mg/L
Molybdenum	7/23/2003	19	6010	0.005 mg/L	--	--	<0.005	mg/L
	9/29/2003	19	6010	0.005 mg/L	--	--	<0.005	mg/L
	11/24/2003	19	6010	0.005 mg/L	--	--	<0.005	mg/L
	5/11/2004	19	6010	0.005 mg/L	--	--	<0.005	mg/L
	2/16/2005	19	6010	0.005 mg/L	--	--	<0.005	mg/L
	11/8/2006	19	6010	0.005 mg/L	--	--	<0.005	mg/L
Sodium	7/23/2003	19	6010	1 mg/L	--	--	24	mg/L
	9/29/2003	19	6010	1 mg/L	--	--	26	mg/L
	11/24/2003	19	6010	1 mg/L	--	--	21	mg/L
	2/16/2005	19	6010	1 mg/L	--	--	28	mg/L
	11/8/2006	19	6010	1 mg/L	--	--	19	mg/L
Zinc	7/23/2003	19	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	9/29/2003	19	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	11/24/2003	19	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	5/11/2004	19	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	2/16/2005	19	6010	0.01 mg/L	2 mg/L	--	0.022	mg/L
	11/8/2006	19	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L

Table 3
Summary of Historical Analytical Results
Roddenbery Site
Cairo, Georgia

Site COI	Sampling Date	Approximate Collection Depth (feet)	Test Method	Method Detection Limit	Type 1 RRS	Type 2 RRS	Resulting Concentration	
Wet Chemistry:								
Chloride	7/23/2003	19	325.2	1 mg/L	--	--	50	mg/L
MW-1 Continued	9/29/2003	19	325.2	1 mg/L	--	--	50	mg/L
	11/24/2003	19	325.2	1 mg/L	--	--	65	mg/L
	5/11/2004	19	325.2	5 mg/L	--	--	50	mg/L
	2/16/2005	19	325.2	5 mg/L	--	--	53	mg/L
	11/8/2006	19	325.2	25 mg/L	--	--	46	mg/L
Ammonia	7/23/2003	19	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	9/29/2003	19	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	11/24/2003	19	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	5/11/2004	19	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	2/16/2005	19	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	11/8/2006	19	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
Nitrite as N	7/23/2003	19	353.2	0.05 mg/L	--	--	<0.05	mg/L
	9/29/2003	19	353.2	0.05 mg/L	--	--	<0.05	mg/L
	11/24/2003	19	353.2	0.05 mg/L	--	--	<0.05	mg/L
	5/11/2004	19	353.2	0.1 mg/L	--	--	<0.1	mg/L
	5/18/2006	19	353.2	0.1 mg/L	--	--	<0.1	mg/L
	11/8/2006	19	353.2	0.1 mg/L	--	--	<0.1	mg/L
Nitrate as N	7/23/2003	19	353.2	0.05 mg/L	--	--	0.98	mg/L
	9/29/2003	19	353.2	0.05 mg/L	--	--	1.1	mg/L
	11/24/2003	19	353.2	0.05 mg/L	--	--	1.4	mg/L
	5/11/2004	19	353.2	0.1 mg/L	--	--	1.6	mg/L
	5/18/2006	19	353.2	0.1 mg/L	--	--	1.7	mg/L
	11/8/2006	19	353.2	0.1 mg/L	--	--	2.2	mg/L
Nitrate-Nitrite as N	2/16/2005	19	353.2	0.1 mg/L	--	--	2	mg/L
Sulfate	7/23/2003	19	375.4	5.0 mg/L	--	--	<5.0	mg/L
	9/29/2003	19	375.4	5.0 mg/L	--	--	<5.0	mg/L
	11/24/2003	19	375.4	5.0 mg/L	--	--	<5.0	mg/L
	5/11/2004	19	375.4	5.0 mg/L	--	--	<5.0	mg/L
	2/16/2005	19	375.4	5.0 mg/L	--	--	<5.0	mg/L
	11/8/2006	19	375.4	5.0 mg/L	--	--	<5.0	mg/L
Miscellaneous								
Methane	7/23/2003	19	RSK175M	26 µg/L	--	--	<26	µg/L
	11/24/2003	19	RSK175M	10 µg/L	--	--	<10	µg/L
	5/11/2004	19	RSK175M	10 µg/L	--	--	<10	µg/L
	2/16/2005	19	RSK175M	10 µg/L	--	--	<10	µg/L
	5/18/2006	19	EPA3810	10 µg/L	--	--	27.6	µg/L
	8/17/2006	19	EPA3810	10 µg/L	--	--	<10	µg/L
	11/8/2006	19	EPA3810	10 µg/L	--	--	<10	µg/L
MW-2 (Well Destroyed)								
Volatiles:								
Naphthalene	9/24/2001	20	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	11/19/2001	20	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	12/12/2001	20	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	1/28/2002	20	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	8/1/2002	20	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	10/10/2002	20	SW8310	0.5 µg/L	20 µg/L	--	1	µg/L
Semi-Volatiles:								
Pentachlorophenol	9/24/2001	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	11/19/2001	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	12/12/2001	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	1/28/2002	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	8/1/2002	20	SW8270C	7.70 µg/L	--	7 µg/L	<7.70	µg/L
	10/10/2002	20	SW8270C	7.70 µg/L	--	7 µg/L	<7.70	µg/L

Table 3
Summary of Historical Analytical Results
Roddenbery Site
Cairo, Georgia

Site COI	Sampling Date	Approximate Collection Depth (feet)	Test Method	Method Detection Limit	Type 1 RRS	Type 2 RRS	Resulting Concentration	
MW-37R								
Volatiles:								
Naphthalene	9/24/2001	20	SW8310	0.5 µg/L	20 µg/L	--	220	µg/L
	11/19/2001	20	SW8310	0.5 µg/L	20 µg/L	--	130	µg/L
	12/12/2001	20	SW8310	0.5 µg/L	20 µg/L	--	170	µg/L
	1/28/2002	20	SW8310	0.5 µg/L	20 µg/L	--	100	µg/L
	8/1/2002	20	SW8310	0.5 µg/L	20 µg/L	--	37	µg/L
	10/10/2002	20	SW8310	0.5 µg/L	20 µg/L	--	11	µg/L
	7/23/2003	20	SW8260	5 µg/L	20 µg/L	--	25	µg/L
	9/29/2003	20	SW8260	5 µg/L	20 µg/L	--	130	µg/L
	11/24/2003	20	SW8260	5 µg/L	20 µg/L	--	88	µg/L
	1/20/2004	20	SW8260	1 µg/L	20 µg/L	--	200	µg/L
	5/11/2004	20	SW8260	2 µg/L	20 µg/L	--	85	µg/L
	8/9/2004	20	SW8260	2 µg/L	20 µg/L	--	220	µg/L
	9/14/2004	20	SW8260	2 µg/L	20 µg/L	--	24	µg/L
	11/9/2004	20	SW8260	1 µg/L	20 µg/L	--	100	µg/L
	2/16/2005	20	SW8260	1 µg/L	20 µg/L	--	90	µg/L
	11/7/2005	20	SW8260	2 µg/L	20 µg/L	--	33	µg/L
	2/28/2006	20	SW8260	2 µg/L	20 µg/L	--	38	µg/L
	5/18/2006	20	SW8260	1 µg/L	20 µg/L	--	36	µg/L
	8/17/2006	20	SW8260	1 µg/L	20 µg/L	--	2.4	µg/L
	11/8/2006	20	SW8260	1 µg/L	20 µg/L	--	4.2	µg/L
	12/30/2008	20	SW8260	5 µg/L	20 µg/L	--	7.5	µg/L
Semi-Volatiles:								
Pentachlorophenol	9/24/2001	20	SW8270C	20 µg/L	--	7 µg/L	1400	µg/L
	11/19/2001	20	SW8270C	20 µg/L	--	7 µg/L	580	µg/L
	12/12/2001	20	SW8270C	20 µg/L	--	7 µg/L	380	µg/L
	1/28/2002	20	SW8270C	20 µg/L	--	7 µg/L	790	µg/L
	8/1/2002	20	SW8270C	7.70 µg/L	--	7 µg/L	620	µg/L
	10/10/2002	20	SW8270C	77 µg/L	--	7 µg/L	880	µg/L
	7/23/2003	20	SW8270C	200 µg/L	--	7 µg/L	420	µg/L
	9/29/2003	20	SW8270C	200 µg/L	--	7 µg/L	1300	µg/L
	11/24/2003	20	SW8270C	200 µg/L	--	7 µg/L	230	µg/L
	1/20/2004	20	SW8270C	50 µg/L	--	7 µg/L	240	µg/L
	5/11/2004	20	SW8270C	200 µg/L	--	7 µg/L	1800	µg/L
	8/9/2004	20	SW8270C	200 µg/L	--	7 µg/L	1500	µg/L
	9/14/2004	20	SW8270C	250 µg/L	--	7 µg/L	300	µg/L
	11/9/2004	20	SW8270C	200 µg/L	--	7 µg/L	320	µg/L
	2/16/2005	20	SW8270C	50 µg/L	--	7 µg/L	330	µg/L
	11/7/2005	20	SW8270C	10 µg/L	--	7 µg/L	160	µg/L
	2/28/2006	20	SW8270C	10 µg/L	--	7 µg/L	400	µg/L
	5/18/2006	20	SW8270C	10 µg/L	--	7 µg/L	24	µg/L
	8/17/2006	20	SW8270C	2.2 µg/L	--	7 µg/L	<2.2	µg/L
	11/8/2006	20	SW8270C	2.5 µg/L	--	7 µg/L	3.4	µg/L
	12/30/2008	20	SW8270C	1 µg/L	--	7 µg/L	43	µg/L
	3/19/2009	20	SW8270C	10 µg/L	--	7 µg/L	58	µg/L
	12/16/~~1999~~ 2009	20	SW8270C	1 µg/L	--	7 µg/L	120	µg/L
Metals:								
Boron	7/23/2003	20	6010	0.01 mg/L	--	--	0.012	mg/L
	9/29/2003	20	6010	0.01 mg/L	--	--	0.019	mg/L
	11/24/2003	20	6010	0.01 mg/L	--	--	0.018	mg/L
	1/20/2004	20	6010	0.01 mg/L	--	--	0.016	mg/L
	5/11/2004	20	6010	0.01 mg/L	--	--	0.013	mg/L
	8/9/2004	20	6010	0.01 mg/L	--	--	0.013	mg/L
	11/9/2004	20	6010	0.01 mg/L	--	--	0.017	mg/L
	2/16/2005	20	6010	0.01 mg/L	--	--	<0.010	mg/L
	11/7/2005	20	6010	0.01 mg/L	--	--	0.022	mg/L
	2/28/2006	20	6010	0.01 mg/L	--	--	0.017	mg/L
	5/18/2006	20	6010	0.01 mg/L	--	--	0.016	mg/L
	8/17/2006	20	6010	0.01 mg/L	--	--	0.016	mg/L
	11/8/2006	20	6010	0.01 mg/L	--	--	0.019	mg/L
Copper	7/23/2003	20	6010	0.002 mg/L	1.3 mg/L	--	0.0024	mg/L
	9/29/2003	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	11/24/2003	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	1/20/2004	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	5/11/2004	20	6010	0.002 mg/L	1.3 mg/L	--	0.068	mg/L
	8/9/2004	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	11/9/2004	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	2/16/2005	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L

Table 3
Summary of Historical Analytical Results
Roddenbery Site
Cairo, Georgia

Site COI	Sampling Date	Approximate Collection Depth (feet)	Test Method	Method Detection Limit	Type 1 RRS	Type 2 RRS	Resulting Concentration	
Iron	7/23/2003	20	6010	0.05 mg/L	--	--	5.7	mg/L
MW-3 Continued	9/29/2003	20	6010	0.05 mg/L	--	--	7.2	mg/L
	11/24/2003	20	6010	0.05 mg/L	--	--	25	mg/L
	1/20/2004	20	6010	0.05 mg/L	--	--	6.8	mg/L
	5/11/2004	20	6010	0.05 mg/L	--	--	6.0	mg/L
	8/9/2004	20	6010	0.05 mg/L	--	--	6.1	mg/L
	11/9/2004	20	6010	0.05 mg/L	--	--	5.8	mg/L
	2/16/2005	20	6010	0.05 mg/L	--	--	10	mg/L
	11/7/2005	20	6010	0.05 mg/L	--	--	8.3	mg/L
	2/28/2006	20	6010	0.05 mg/L	--	--	13	mg/L
	5/18/2006	20	6010	0.05 mg/L	--	--	15	mg/L
	8/17/2006	20	6010	0.05 mg/L	--	--	16	mg/L
	11/8/2006	20	6010	0.05 mg/L	--	--	13	mg/L
Molybdenum	7/23/2003	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	9/29/2003	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	11/24/2003	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	1/20/2004	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	5/11/2004	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	8/9/2004	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	11/9/2004	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	2/16/2005	20	6010	0.005 mg/L	--	--	<0.005	mg/L
Sodium	7/23/2003	20	6010	1 mg/L	--	--	130	mg/L
	9/29/2003	20	6010	1 mg/L	--	--	160	mg/L
	11/24/2003	20	6010	1 mg/L	--	--	360	mg/L
	1/20/2004	20	6010	1 mg/L	--	--	280	mg/L
	5/11/2004	20	6010	1 mg/L	--	--	120	mg/L
	8/9/2004	20	6010	1 mg/L	--	--	250	mg/L
	11/9/2004	20	6010	1 mg/L	--	--	170	mg/L
	2/16/2005	20	6010	1 mg/L	--	--	410	mg/L
	11/7/2005	20	6010	1 mg/L	--	--	120	mg/L
	2/28/2006	20	6010	1 mg/L	--	--	160	mg/L
	5/18/2006	20	6010	1 mg/L	--	--	160	mg/L
	8/17/2006	20	6010	1 mg/L	--	--	290	mg/L
	11/8/2006	20	6010	1 mg/L	--	--	74	mg/L
Zinc	7/23/2003	20	6010	0.01 mg/L	2 mg/L	--	0.024	mg/L
	9/29/2003	20	6010	0.01 mg/L	2 mg/L	--	0.036	mg/L
	11/24/2003	20	6010	0.01 mg/L	2 mg/L	--	<0.010	mg/L
	1/20/2004	20	6010	0.01 mg/L	2 mg/L	--	<0.010	mg/L
	5/11/2004	20	6010	0.01 mg/L	2 mg/L	--	0.025	mg/L
	8/9/2004	20	6010	0.01 mg/L	2 mg/L	--	<0.010	mg/L
	11/9/2004	20	6010	0.01 mg/L	2 mg/L	--	<0.010	mg/L
	2/16/2005	20	6010	0.01 mg/L	2 mg/L	--	<0.010	mg/L
Wet Chemistry:								
Chloride	7/23/2003	20	325.2	1 mg/L	--	--	200	mg/L
	9/29/2003	20	325.2	1 mg/L	--	--	250	mg/L
	11/24/2003	20	325.2	1 mg/L	--	--	670	mg/L
	1/20/2004	20	325.2	1 mg/L	--	--	460	mg/L
	5/11/2004	20	325.2	5 mg/L	--	--	190	mg/L
	8/9/2004	20	325.2	5 mg/L	--	--	280	mg/L
	11/9/2004	20	325.2	5 mg/L	--	--	250	mg/L
	2/16/2005	20	325.2	5 mg/L	--	--	380	mg/L
	11/7/2005	20	325.2	5 mg/L	--	--	180	mg/L
	2/28/2006	20	325.2	5 mg/L	--	--	130	mg/L
	5/18/2006	20	325.2	50 mg/L	--	--	240	mg/L
	8/17/2006	20	325.2	75 mg/L	--	--	250	mg/L
	11/8/2006	20	325.2	50mg/L	--	--	310	mg/L
Ammonia	7/23/2003	20	350.1	0.1 mg/L	30 mg/L	--	<0.10	mg/L
	9/29/2003	20	350.1	0.1 mg/L	30 mg/L	--	<0.10	mg/L
	11/24/2003	20	350.1	0.1 mg/L	30 mg/L	--	2.50	mg/L
	1/20/2004	20	350.1	0.1 mg/L	30 mg/L	--	2.50	mg/L
	5/11/2004	20	350.1	0.1 mg/L	30 mg/L	--	2.70	mg/L
	8/9/2004	20	350.1	0.1 mg/L	30 mg/L	--	3.40	mg/L
	11/9/2004	20	350.1	1.0 mg/L	30 mg/L	--	3.50	mg/L
	2/16/2005	20	350.1	0.1 mg/L	30 mg/L	--	6.00	mg/L
	11/7/2005	20	350.1	0.1 mg/L	30 mg/L	--	1.40	mg/L

Table 3
Summary of Historical Analytical Results
Roddenbery Site
Cairo, Georgia

Site COI	Sampling Date	Approximate Collection Depth (feet)	Test Method	Method Detection Limit	Type 1 RRS	Type 2 RRS	Resulting Concentration		
Ammonia	2/28/2006	20	350.1	0.1 mg/L	30 mg/L	--	6.40	mg/L	***
MW-3 Continued	5/18/2006	20	350.1	1.0 mg/L	30 mg/L	--	9.00	mg/L	
	8/17/2006	20	350.1	0.5 mg/L	30 mg/L	--	6.70	mg/L	
	11/8/2006	20	350.1	0.5 mg/L	30 mg/L	--	6.90	mg/L	
Nitrite as N	7/23/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L	
	9/29/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L	
	11/24/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L	
	5/18/2006	20	353.2	0.10 mg/L	--	--	<0.10	mg/L	
	11/8/2006	20	353.2	0.10 mg/L	--	--	<0.10	mg/L	
Nitrate as N	7/23/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L	
	9/29/2003	20	353.2	0.05 mg/L	--	--	0.12	mg/L	
	11/24/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L	
	5/11/2004	20	353.2	0.10 mg/L	--	--	<0.10	mg/L	
	5/18/2006	20	353.2	0.10 mg/L	--	--	<0.10	mg/L	
	11/8/2006	20	353.2	0.10 mg/L	--	--	<0.10	mg/L	
Nitrate-Nitrite as N	2/16/2005	20	353.2	0.1 mg/L	--	--	<0.1	mg/L	
Sulfate	7/23/2003	20	375.4	5.0 mg/L	--	--	24	mg/L	
	9/29/2003	20	375.4	5.0 mg/L	--	--	32	mg/L	
	11/24/2003	20	375.4	5.0 mg/L	--	--	21	mg/L	
	1/20/2004	20	375.4	5.0 mg/L	--	--	2700	mg/L	
	5/11/2004	20	375.4	5.0 mg/L	--	--	39	mg/L	
	8/9/2004	20	375.4	5.0 mg/L	--	--	60	mg/L	
	11/9/2004	20	375.4	5.0 mg/L	--	--	42	mg/L	
	2/16/2005	20	375.4	5.0 mg/L	--	--	35	mg/L	
	11/7/2005	20	375.4	5.0 mg/L	--	--	25	mg/L	
	2/28/2006	20	375.4	5.0 mg/L	--	--	19	mg/L	
	5/18/2006	20	375.4	5.0 mg/L	--	--	14	mg/L	
	8/17/2006	20	375.4	5.0 mg/L	--	--	13	mg/L	
	11/8/2006	20	375.4	5.0 mg/L	--	--	8.7	mg/L	
Miscellaneous									
Methane	7/23/2003	20	RSK175M	26 µg/L	--	--	708	µg/L	
	11/24/2003	20	RSK175M	10 µg/L	--	--	250	µg/L	
	1/20/2004	20	RSK175M	10 µg/L	--	--	160	µg/L	
	5/11/2004	20	RSK175M	10 µg/L	--	--	86	µg/L	
	8/9/2004	20	RSK175M	10 µg/L	--	--	150	µg/L	
	11/9/2004	20	RSK175M	10 µg/L	--	--	94.9	µg/L	
	2/16/2005	20	RSK175M	10 µg/L	--	--	1510	µg/L	
	11/7/2005	20	RSK175M	100 µg/L	--	--	1400	µg/L	
	2/28/2006	20	RSK175M	100 µg/L	--	--	935	µg/L	
	5/18/2006	20	EPA3810	10 µg/L	--	--	1630	µg/L	
	8/17/2006	20	EPA3810	10 mg/L	--	--	1490	µg/L	
	11/8/2006	20	EPA3810	10 mg/L	--	--	531	µg/L	
MW-4									
Volatiles:									
Naphthalene	9/24/2001	20	SW8310	0.5 µg/L	20 µg/L	--	480	µg/L	
	11/19/2001	20	SW8310	0.5 µg/L	20 µg/L	--	170	µg/L	
	12/12/2001	20	SW8310	0.5 µg/L	20 µg/L	--	150	µg/L	
	1/28/2002	20	SW8310	0.5 µg/L	20 µg/L	--	67	µg/L	
	8/1/2002	20	SW8310	0.5 µg/L	20 µg/L	--	0.64	µg/L	
	10/10/2002	20	SW8310	0.5 µg/L	20 µg/L	--	1.9	µg/L	
	7/23/2003	20	SW8260	5 µg/L	20 µg/L	--	5.7	µg/L	
	9/29/2003	20	SW8260	5 µg/L	20 µg/L	--	<5	µg/L	
	11/24/2003	20	SW8260	5 µg/L	20 µg/L	--	<5	µg/L	
	12/30/2008	20	SW8260	5 µg/L	20 µg/L	--	7	µg/L	
Semi-Volatiles:									
Pentachlorophenol	9/24/2001	20	SW8270C	20 µg/L	--	7 µg/L	1400	µg/L	
	11/19/2001	20	SW8270C	20 µg/L	--	7 µg/L	430	µg/L	
	12/12/2001	20	SW8270C	20 µg/L	--	7 µg/L	450	µg/L	
	1/28/2002	20	SW8270C	20 µg/L	--	7 µg/L	500	µg/L	
	8/1/2002	20	SW8270C	7.70 µg/L	--	7 µg/L	<7.70	µg/L	
	10/10/2002	20	SW8270C	7.70 µg/L	--	7 µg/L	<7.70	µg/L	
	7/23/2003	20	SW8270C	10 µg/L	--	7 µg/L	<10	µg/L	

Table 3
Summary of Historical Analytical Results
Roddenbery Site
Cairo, Georgia

Site COI	Sampling Date	Approximate Collection Depth (feet)	Test Method	Method Detection Limit	Type 1 RRS	Type 2 RRS	Resulting Concentration	
Pentachlorophenol	9/29/2003	20	SW8270C	10 µg/L	--	7 µg/L	<10	µg/L
MW-4 Continued	11/24/2003	20	SW8270C	2.2 µg/L	--	7 µg/L	<2.2	µg/L
	5/11/2004	20	SW8270C	2.2 µg/L	--	7 µg/L	<2.2	µg/L
	12/30/2009	20	SW8270C	1 µg/L	--	7 µg/L	<1	µg/L
Metals:								
Boron	7/23/2003	20	6010	0.01 mg/L	--	--	<0.01	mg/L
	9/29/2003	20	6010	0.01 mg/L	--	--	0.018	mg/L
	11/24/2003	20	6010	0.01 mg/L	--	--	0.02	mg/L
	2/16/2005	20	6010	0.01 mg/L	--	--	<0.01	mg/L
	11/8/2006	20	6010	0.01 mg/L	--	--	0.052	mg/L
Copper	7/23/2003	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	9/29/2003	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	11/24/2003	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	5/11/2004	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	2/16/2005	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	11/8/2006	20	6010	0.005 mg/L	1.3 mg/L	--	<0.005	mg/L
Iron	7/23/2003	20	6010	0.05 mg/L	--	--	1.20	mg/L
	9/29/2003	20	6010	0.05 mg/L	--	--	3.90	mg/L
	11/24/2003	20	6010	0.05 mg/L	--	--	4.30	mg/L
	5/11/2004	20	6010	0.05 mg/L	--	--	0.44	mg/L
	2/16/2005	20	6010	0.05 mg/L	--	--	2.90	mg/L
	11/8/2006	20	6010	0.05 mg/L	--	--	6.70	mg/L
Molybdenum	7/23/2003	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	9/29/2003	20	6010	0.005 mg/L	--	--	0.0071	mg/L
	11/24/2003	20	6010	0.005 mg/L	--	--	0.0073	mg/L
	5/11/2004	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	2/16/2005	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	11/8/2006	20	6010	0.005 mg/L	--	--	0.043	mg/L
Sodium	7/23/2003	20	6010	1 mg/L	--	--	56 mg/L	mg/L
	9/29/2003	20	6010	1 mg/L	--	--	150 mg/L	mg/L
	11/24/2003	20	6010	1 mg/L	--	--	200 mg/L	mg/L
	2/16/2005	20	6010	1 mg/L	--	--	220 mg/L	mg/L
	11/8/2006	20	6010	1 mg/L	--	--	74 mg/L	mg/L
Zinc	7/23/2003	20	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	9/29/2003	20	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	11/24/2003	20	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	5/11/2004	20	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	2/16/2005	20	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	11/8/2006	20	6010	0.01 mg/L	2 mg/L	--	0.018	mg/L
Wet Chemistry:								
Chloride	7/23/2003	20	325.2	1 mg/L	--	--	100	mg/L
	9/29/2003	20	325.2	1 mg/L	--	--	230	mg/L
	11/24/2003	20	325.2	1 mg/L	--	--	430	mg/L
	5/11/2004	20	325.2	5 mg/L	--	--	91	mg/L
	2/16/2005	20	325.2	5 mg/L	--	--	200	mg/L
	11/8/2006	20	325.2	25 mg/L	--	--	190	mg/L
Ammonia	7/23/2003	20	350.1	0.1 mg/L	30 mg/L	--	0.18	mg/L
	9/29/2003	20	350.1	0.1 mg/L	30 mg/L	--	7.2	mg/L
	11/24/2003	20	350.1	0.1 mg/L	30 mg/L	--	27	mg/L
	5/11/2004	20	350.1	0.1 mg/L	30 mg/L	--	6.2	mg/L
	2/16/2005	20	350.1	0.1 mg/L	30 mg/L	--	3.2	mg/L
	11/8/2006	20	350.1	8.0 mg/L	30 mg/L	--	65	mg/L
Nitrite as N	7/23/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L
	9/29/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L
	11/24/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L
	5/11/2004	20	353.2	0.1 mg/L	--	--	<0.1	mg/L
	11/8/2006	20	353.2	0.1 mg/L	--	--	<0.1	mg/L
Nitrate as N	7/23/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L
	9/29/2003	20	353.2	0.05 mg/L	--	--	0.12	mg/L
	11/24/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L

Table 3
Summary of Historical Analytical Results
Roddenbery Site
Cairo, Georgia

Site COI	Sampling Date	Approximate Collection Depth (feet)	Test Method	Method Detection Limit	Type 1 RRS	Type 2 RRS	Resulting Concentration	
Nitrate as N	5/11/2004	20	353.2	0.1 mg/L	--	--	0.62	mg/L
MW-4 Continued	11/8/2006	20	353.2	0.1 mg/L	--	--	<0.1	mg/L
Nitrate-Nitrite as N	2/16/2005	20	353.2	0.1 mg/L	--	--	<0.1	mg/L
Sulfate	7/23/2003	20	375.4	5.0 mg/L	--	--	11	mg/L
	9/29/2003	20	375.4	5.0 mg/L	--	--	27	mg/L
	11/24/2003	20	375.4	5.0 mg/L	--	--	28	mg/L
	5/11/2004	20	375.4	5.0 mg/L	--	--	20	mg/L
	2/16/2005	20	375.4	5.0 mg/L	--	--	17	mg/L
	11/8/2006	20	375.4	25.0 mg/L	--	--	66	mg/L
Miscellaneous								
Methane	7/23/2003	20	RSK175M	26 µg/L	--	--	465	µg/L
	11/24/2003	20	RSK175M	10 µg/L	--	--	280	µg/L
	5/11/2004	20	RSK175M	10 µg/L	--	--	31	µg/L
	2/16/2005	20	RSK175M	10 µg/L	--	--	1150	µg/L
	8/17/2006	20	EPA3810	10 µg/L	--	--	2160	µg/L
	11/8/2006	20	EPA3810	10 µg/L	--	--	710	µg/L
MW-5								
Volatiles:								
Naphthalene	9/24/2001	20	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	11/19/2001	20	SW8310	0.5 µg/L	20 µg/L	--	1.8	µg/L
	12/12/2001	20	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	1/28/2002	20	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	8/1/2002	20	SW8310	0.5 µg/L	20 µg/L	--	1.3	µg/L
	10/10/2002	20	SW8310	0.5 µg/L	20 µg/L	--	1.5	µg/L
	12/30/2008	20	SW8260	5 µg/L	20 µg/L	--	<5	µg/L
Semi-Volatiles:								
Pentachlorophenol	9/24/2001	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	11/19/2001	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	12/12/2001	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	1/28/2002	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	8/1/2002	20	SW8270C	7.70 µg/L	--	7 µg/L	<7.70	µg/L
	10/10/2002	20	SW8270C	7.70 µg/L	--	7 µg/L	<7.70	µg/L
	12/30/2008	20	SW8270C	1 µg/L	--	7 µg/L	1.1	µg/L
Miscellaneous								
Methane	8/17/2006	20	EPA3810	10 µg/L	--	--	218	µg/L
	11/8/2006	20	EPA3810	10 µg/L	--	--	65.5	µg/L
MW-6								
Volatiles:								
Naphthalene	9/24/2001	20	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	11/19/2001	20	SW8310	0.5 µg/L	20 µg/L	--	1.6	µg/L
	12/12/2001	20	SW8310	0.5 µg/L	20 µg/L	--	2.3	µg/L
	1/28/2002	20	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	8/1/2002	20	SW8310	0.5 µg/L	20 µg/L	--	0.55	µg/L
	10/10/2002	20	SW8310	0.5 µg/L	20 µg/L	--	<0.5	µg/L
	7/23/2003	20	SW8260	5 µg/L	20 µg/L	--	<5	µg/L
	9/29/2003	20	SW8260	5 µg/L	20 µg/L	--	<5	µg/L
	11/24/2003	20	SW8260	5 µg/L	20 µg/L	--	<5	µg/L
	12/30/2008	20	SW8260	5 µg/L	20 µg/L	--	<5	µg/L
Semi-Volatiles:								
Pentachlorophenol	9/24/2001	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	11/19/2001	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	12/12/2001	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	1/28/2002	20	SW8270C	20 µg/L	--	7 µg/L	<20	µg/L
	8/1/2002	20	SW8270C	7.70 µg/L	--	7 µg/L	<7.70	µg/L
	10/10/2002	20	SW8270C	7.70 µg/L	--	7 µg/L	<7.70	µg/L
	7/23/2003	20	SW8270C	10 µg/L	--	7 µg/L	<10	µg/L
	9/29/2003	20	SW8270C	10 µg/L	--	7 µg/L	<10	µg/L
	11/24/2003	20	SW8270C	2.3 µg/L	--	7 µg/L	<2.3	µg/L
	5/11/2004	20	SW8270C	2.2 µg/L	--	7 µg/L	<2.2	µg/L
	12/30/2008	20	SW8270C	1 µg/L	--	7 µg/L	<1	µg/L

Table 3
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Roddenbery Site
Cairo, Georgia

Site COI	Sampling Date	Approximate Collection Depth (feet)	Test Method	Method Detection Limit	Type 1 RRS	Type 2 RRS	Resulting Concentration	
Metals:								
Boron	7/23/2003	20	6010	0.01 mg/L	--	--	<0.01	mg/L
MW-6 continued	9/29/2003	20	6010	0.01 mg/L	--	--	0.013	mg/L
	11/24/2003	20	6010	0.01 mg/L	--	--	0.015	mg/L
	2/16/2005	20	6010	0.01 mg/L	--	--	<0.01	mg/L
	11/8/2006	20	6010	0.01 mg/L	--	--	0.025	mg/L
Copper	7/23/2003	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	9/29/2003	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	11/24/2003	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	5/11/2004	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	2/16/2005	20	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	11/8/2006	20	6010	0.005 mg/L	1.3 mg/L	--	<0.005	mg/L
Iron	7/23/2003	20	6010	0.05 mg/L	--	--	<0.05	mg/L
	9/29/2003	20	6010	0.05 mg/L	--	--	<0.05	mg/L
	11/24/2003	20	6010	0.05 mg/L	--	--	0.085	mg/L
	5/11/2004	20	6010	0.05 mg/L	--	--	<0.05	mg/L
	2/16/2005	20	6010	0.05 mg/L	--	--	0.27	mg/L
	11/8/2006	20	6010	0.05 mg/L	--	--	0.076	mg/L
Molybdenum	7/23/2003	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	9/29/2003	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	11/24/2003	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	5/11/2004	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	2/16/2005	20	6010	0.005 mg/L	--	--	<0.005	mg/L
	11/8/2006	20	6010	0.005 mg/L	--	--	<0.005	mg/L
Sodium	7/23/2003	20	6010	1 mg/L	--	--	9.1	mg/L
	9/29/2003	20	6010	1 mg/L	--	--	11	mg/L
	11/24/2003	20	6010	1 mg/L	--	--	11	mg/L
	2/16/2005	20	6010	1 mg/L	--	--	11	mg/L
	11/8/2006	20	6010	1 mg/L	--	--	11	mg/L
Zinc	7/23/2003	20	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	9/29/2003	20	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	11/24/2003	20	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	5/11/2004	20	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	2/16/2005	20	6010	0.01 mg/L	2 mg/L	--	0.016	mg/L
	11/8/2006	20	6010	0.01 mg/L	2 mg/L	--	0.012	mg/L
Wet Chemistry:								
Chloride	7/23/2003	20	325.2	1 mg/L	--	--	12	mg/L
	9/29/2003	20	325.2	1 mg/L	--	--	12	mg/L
	11/24/2003	20	325.2	1 mg/L	--	--	10	mg/L
	5/11/2004	20	325.2	5 mg/L	--	--	8.8	mg/L
	2/16/2005	20	325.2	5 mg/L	--	--	12	mg/L
	11/8/2006	20	325.2	5 mg/L	--	--	14	mg/L
Ammonia	7/23/2003	20	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	9/29/2003	20	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	11/24/2003	20	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	5/11/2004	20	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	2/16/2005	20	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	11/8/2006	20	350.1	0.1 mg/L	30 mg/L	--	0.11	mg/L
Nitrite as N	7/23/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L
	9/29/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L
	11/24/2003	20	353.2	0.05 mg/L	--	--	<0.05	mg/L
	5/11/2004	20	353.2	0.1 mg/L	--	--	<0.1	mg/L
	11/8/2006	20	353.2	0.1 mg/L	--	--	<0.1	mg/L
Nitrate as N	7/23/2003	20	353.2	0.05 mg/L	--	--	0.7	mg/L
	9/29/2003	20	353.2	0.05 mg/L	--	--	0.61	mg/L
	11/24/2003	20	353.2	0.05 mg/L	--	--	0.3	mg/L
	5/11/2004	20	353.2	0.1 mg/L	--	--	0.38	mg/L
	11/8/2006	20	353.2	0.1 mg/L	--	--	0.8	mg/L
Nitrate-Nitrite as N	2/16/2005	20	353.2	0.1 mg/L	--	--	0.53	mg/L

Table 3
Summary of Historical Analytical Results
Roddenbery Site
Cairo, Georgia

Site COI	Sampling Date	Approximate Collection Depth (feet)	Test Method	Method Detection Limit	Type 1 RRS	Type 2 RRS	Resulting Concentration	
Sulfate	7/23/2003	20	375.4	5.0 mg/L	--	--	6	mg/L
MW-6 continued	9/29/2003	20	375.4	5.0 mg/L	--	--	20	mg/L
	11/24/2003	20	375.4	5.0 mg/L	--	--	10	mg/L
	5/11/2004	20	375.4	5.0 mg/L	--	--	22	mg/L
	2/16/2005	20	375.4	5.0 mg/L	--	--	19	mg/L
	11/8/2006	20	375.4	5.0 mg/L	--	--	19	mg/L
Miscellaneous								
Methane	7/23/2003	20	RSK175M	26 µg/L	--	--	<26	µg/L
	11/24/2003	20	RSK175M	10 µg/L	--	--	<10	µg/L
	5/11/2004	20	RSK175M	10 µg/L	--	--	<10	µg/L
	2/16/2005	20	RSK175M	10 µg/L	--	--	<10	µg/L
	11/8/2006	20	EPA3810	10 µg/L	--	--	<10	µg/L
MW-8								
Volatiles:								
Naphthalene	9/24/2001	27	SW8310	0.5 µg/L	20 µg/L	--	800	µg/L
	11/19/2001	27	SW8310	0.5 µg/L	20 µg/L	--	550	µg/L
	12/12/2001	27	SW8310	0.5 µg/L	20 µg/L	--	980	µg/L
	1/28/2002	27	SW8310	0.5 µg/L	20 µg/L	--	110	µg/L
	8/1/2002	27	SW8310	0.5 µg/L	20 µg/L	--	820	µg/L
	10/10/2002	27	SW8310	0.5 µg/L	20 µg/L	--	700	µg/L
	7/23/2003	27	SW8260	250 µg/L	20 µg/L	--	1000	µg/L
	9/29/2003	27	SW8260	250 µg/L	20 µg/L	--	2300	µg/L
	11/24/2003	27	SW8260	25 µg/L	20 µg/L	--	870	µg/L
	1/20/2004	27	SW8260	10 µg/L	20 µg/L		420	µg/L
	5/11/2004	27	SW8260	10 µg/L	20 µg/L	--	1300	µg/L
	8/9/2004	27	SW8260	10 µg/L	20 µg/L	--	1800	µg/L
	9/14/2004	27	SW8260	10 µg/L	20 µg/L	--	1100	µg/L
	11/9/2004	27	SW8260	10 µg/L	20 µg/L	--	510	µg/L
	2/21/2005	27	SW8260	20 µg/L	20 µg/L	--	1200	µg/L
	11/7/2005	27	SW8260	5 µg/L	20 µg/L	--	570	µg/L
	2/28/2006	27	SW8260	5 µg/L	20 µg/L	--	120	µg/L
	5/18/2006	27	SW8260	2 µg/L	20 µg/L	--	130	µg/L
	8/17/2006	27	SW8260	2 µg/L	20 µg/L	--	46	µg/L
	11/8/2006	27	SW8260	2 µg/L	20 µg/L	--	80	µg/L
	2/13/2007	27	SW8260	1 µg/L	20 µg/L	--	38	µg/L
	5/7/2007	27	SW8260	1 µg/L	20 µg/L	--	92	µg/L
	8/15/2007	27	SW8260	1 µg/L	20 µg/L	--	47.5	µg/L
	12/19/2007	27	SW8260	5 µg/L	20 µg/L	--	.57	µg/L
	3/27/2008	27	SW8260	5 µg/L	20 µg/L	--	160	µg/L
	6/19/2008	27	SW8260	25 µg/L	20 µg/L	--	55	µg/L
	9/30/2008	27	SW8260	5 µg/L	20 µg/L	--	8.4	µg/L
	12/30/2008	27	SW8260	50 µg/L	20 µg/L	--	580	µg/L
	3/19/2009	27	SW8260	50 µg/L	20 µg/L	--	470	µg/L
	12/16/2009	27	SW8260	120 µg/L	20 µg/L	--	700	µg/L
Semi-Volatiles:								
Pentachlorophenol	9/24/2001	27	SW8270C	20 µg/L	--	7 ug/L	280	µg/L
	11/19/2001	27	SW8270C	20 µg/L	--	7 ug/L	420	µg/L
	12/12/2001	27	SW8270C	20 µg/L	--	7 ug/L	260	µg/L
	1/28/2002	27	SW8270C	20 µg/L	--	7 ug/L	420	µg/L
	8/1/2002	27	SW8270C	7.70 µg/L	--	7 ug/L	30	µg/L
	10/10/2002	27	SW8270C	7.70 µg/L	--	7 ug/L	12	µg/L
	7/23/2003	27	SW8270C	10 µg/L	--	7 ug/L	<10	µg/L
	9/29/2003	27	SW8270C	10 µg/L	--	7 ug/L	<10	µg/L
	11/24/2003	27	SW8270C	2.2 µg/L	--	7 ug/L	<2.2	µg/L
	5/11/2004	27	SW8270C	2.2 µg/L	--	7 ug/L	<2.2	µg/L
	9/14/2004	27	SW8270C	2.2 µg/L	--	7 ug/L	<2.2	µg/L
	12/30/2008	27	SW8270C	1 µg/L	--	7 ug/L	<1	µg/L
Metals:								
Boron	7/23/2003	27	6010	0.01 mg/L	--	--	<0.01	mg/L
	9/29/2003	27	6010	0.01 mg/L	--	--	0.014	mg/L
	11/24/2003	27	6010	0.01 mg/L	--	--	0.017	mg/L
	1/20/2004	27	6010	0.01 mg/L	--	--	0.017	mg/L
	5/11/2004	27	6010	0.01 mg/L	--	--	0.014	mg/L
	2/21/2005	27	6010	0.01 mg/L	--	--	0.012	mg/L
	11/8/2006	27	6010	0.01 mg/L	--	--	0.031	mg/L
Copper	7/23/2003	27	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	9/29/2003	27	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	11/24/2003	27	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	1/20/2004	27	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	5/11/2004	27	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	2/21/2005	27	6010	0.002 mg/L	1.3 mg/L	--	<0.002	mg/L
	11/8/2006	27	6010	0.005 mg/L	1.3 mg/L	--	<0.005	mg/L

Table 3
Summary of Historical Analytical Results
Roddenbery Site
Cairo, Georgia

Site COI	Sampling Date	Approximate Collection Depth (feet)	Test Method	Method Detection Limit	Type 1 RRS	Type 2 RRS	Resulting Concentration	
Iron	7/23/2003	27	6010	0.05 mg/L	--	--	15	mg/L
MW-8 Continued	9/29/2003	27	6010	0.05 mg/L	--	--	13	mg/L
	11/24/2003	27	6010	0.05 mg/L	--	--	14	mg/L
	1/20/2004	27	6010	0.05 mg/L	--	--	21	mg/L
	5/11/2004	27	6010	0.05 mg/L	--	--	18	mg/L
	2/21/2005	27	6010	0.05 mg/L	--	--	13	mg/L
	11/8/2006	27	6010	0.05 mg/L	--	--	15	mg/L
Molybdenum	7/23/2003	27	6010	0.005 mg/L	--	--	<0.005	mg/L
	9/29/2003	27	6010	0.005 mg/L	--	--	<0.005	mg/L
	11/24/2003	27	6010	0.005 mg/L	--	--	<0.005	mg/L
	1/20/2004	27	6010	0.005 mg/L	--	--	<0.005	mg/L
	5/11/2004	27	6010	0.005 mg/L	--	--	<0.005	mg/L
	2/21/2005	27	6010	0.005 mg/L	--	--	<0.005	mg/L
	11/8/2006	27	6010	0.005 mg/L	--	--	<0.005	mg/L
Sodium	7/23/2003	27	6010	1 mg/L	--	--	92	mg/L
	9/29/2003	27	6010	1 mg/L	--	--	84	mg/L
	11/24/2003	27	6010	1 mg/L	--	--	91	mg/L
	1/20/2004	27	6010	1 mg/L	--	--	93	mg/L
	5/11/2004	27	6010	1 mg/L	--	--	67	mg/L
	2/21/2005	27	6010	1 mg/L	--	--	61	mg/L
	11/8/2006	27	6010	1 mg/L	--	--	68	mg/L
Zinc	7/23/2003	27	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	9/29/2003	27	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	11/24/2003	27	6010	0.01 mg/L	2 mg/L	--	0.02	mg/L
	1/20/2004	27	6010	0.01 mg/L	2 mg/L	--	<0.01	mg/L
	5/11/2004	27	6010	0.01 mg/L	2 mg/L	--	0.011	mg/L
	2/21/2005	27	6010	0.01 mg/L	2 mg/L	--	0.01	mg/L
	11/8/2006	27	6010	0.01 mg/L	2 mg/L	--	0.014	mg/L
Wet Chemistry:								
Chloride	7/23/2003	27	325.2	1 mg/L	--	--	270	mg/L
	9/29/2003	27	325.2	1 mg/L	--	--	260	mg/L
	11/24/2003	27	6010	1 mg/L	--	--	340	mg/L
	1/20/2004	27	325.2	1 mg/L	--	--	260	mg/L
	5/11/2004	27	6010	5 mg/L	--	--	270	mg/L
	2/21/2005	27	6010	5 mg/L	--	--	190	mg/L
	11/8/2006	27	6010	25 mg/L	--	--	190	mg/L
Ammonia	7/23/2003	27	350.1	0.1 mg/L	30 mg/L	--	0.2	mg/L
	9/29/2003	27	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	11/24/2003	27	350.1	0.1 mg/L	30 mg/L	--	<0.1	mg/L
	1/20/2004	27	350.1	0.1 mg/L	30 mg/L	--	1.4	mg/L
	5/11/2004	27	350.1	0.1 mg/L	30 mg/L	--	0.42	mg/L
	2/21/2005	27	350.1	0.1 mg/L	30 mg/L	--	0.34	mg/L
	11/8/2006	27	350.1	0.1 mg/L	30 mg/L	--	0.46	mg/L
Nitrite as N	7/23/2003	27	353.2	0.05 mg/L	--	--	<0.05	mg/L
	9/29/2003	27	353.2	0.05 mg/L	--	--	<0.05	mg/L
	11/24/2003	27	353.2	0.05 mg/L	--	--	<0.05	mg/L
	5/11/2004	27	353.2	0.1 mg/L	--	--	<0.1	mg/L
	2/21/2005	27	353.2	0.1 mg/L	--	--	<0.1	mg/L
	5/18/2006	27	353.2	0.1 mg/L	--	--	<0.1	mg/L
	11/8/2006	27	353.2	0.1 mg/L	--	--	<0.1	mg/L
Nitrate as N	7/23/2003	27	353.2	0.05 mg/L	--	--	<0.05	mg/L
	9/29/2003	27	353.2	0.05 mg/L	--	--	0.17	mg/L
	11/24/2003	27	353.2	0.05 mg/L	--	--	<0.05	mg/L
	5/11/2004	27	353.2	0.1 mg/L	--	--	<0.1	mg/L
	2/21/2005	27	353.2	0.1 mg/L	--	--	<0.1	mg/L
	5/18/2006	27	353.2	0.1 mg/L	--	--	<0.1	mg/L
	5/18/2006	27	353.2	0.1 mg/L	--	--	<0.1	mg/L
Sulfate	7/23/2003	27	375.4	5.0 mg/L	--	--	<5	mg/L
	9/29/2003	27	375.4	5.0 mg/L	--	--	<5	mg/L
	11/24/2003	27	375.4	5.0 mg/L	--	--	<5	mg/L
	1/20/2004	27	375.4	5.0 mg/L	--	--	2500	mg/L
	5/11/2004	27	375.4	5.0 mg/L	--	--	<5	mg/L
	2/21/2005	27	375.4	5.0 mg/L	--	--	<5	mg/L
	11/8/2006	27	375.4	25.0 mg/L	--	--	100	mg/L

Table 3
Summary of Historical Analytical Results
Roddenbery Site
Cairo, Georgia

Site COI	Sampling Date	Approximate Collection Depth (feet)	Test Method	Method Detection Limit	Type 1 RRS	Type 2 RRS	Resulting Concentration	
Miscellaneous								
Methane	7/23/2003	27	RSK175M	26 µg/L	--	--	2000	µg/L
MW-8 continued	11/24/2003	27	RSK175M	10 µg/L	--	--	<10	µg/L
	1/20/2004	27	RSK175M	10 µg/L	--	--	110	µg/L
	5/11/2004	27	RSK175M	10 µg/L	--	--	320	µg/L
	2/21/2005	27	RSK175M	10 µg/L	--	--	625	µg/L
	5/18/2006	27	EPA3810	10 µg/L	--	--	235	µg/L
	11/8/2006	27	EPA3810	10 µg/L	--	--	152	µg/L

Notes:
µg/L - micrograms/Liter
mg/L- milligrams/Liter

Appendix G

August 9, 2010

Rod Prince
Energy Services Director
City of Cairo
100 2nd St. SW
Cairo, GA 39828

Ms. Rebecca R. Cline
1393 Stephens Lane NW
Cairo, GA 39828

Dear Rebecca,

Per your request, the City of Cairo does not have any active water wells in the vicinity of the property known today as the Grady Cultural Center, located at 101 1st St. NW, Cairo, GA 39828. Actually, the City of Cairo no longer has any active wells on the west side of town.

If you need anything further, please give me a call.

Sincerely,

Rod Prince
229-224-1026 Cell
229-377-3653 x 232 Office

ons TELEVISION

CITY OF CAIRO
"Georgia's Hospitality City"

SyrupCity.net

June 30, 2009

Rod Prince
Energy Services Director
City of Cairo
100 2nd St. SW
Cairo, GA 39828

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