August 15, 2017

Mr. David Hayes
Environmental Protection Division
Response and Remediation Program
2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334

Subject: **Addendum to Compliance Status Report**
Response to June 30, 2017 Comments
Imperial Cleaners VRP CSR dated July 27, 2016
Amec Foster Wheeler Project No. 6305050319

Dear Mr. Hayes:

On behalf of PM, Ltd., Amec Foster Wheeler Environment & Infrastructure, Inc. respectfully submits the following Responses to EPD's June 30, 2017 Comments on the July 27, 2016 Compliance Status Report (CSR) for the Imperial Cleaners property formerly located at 1233B Alpharetta Highway in the city limits of Roswell, Fulton County, Georgia. Based on recent additional information and a meeting at EPD on August 14, 2017, a Revised Certification Statement is attached for clarification.

EPD's letter submitted five comments. PM, Ltd. is responding herein better able to Comments 1, 2, 3 and 5. The Fulton County Board of Education (BOE) is to address Comment 4 since they now own the property and have performed the most recent corrective action related to soil conditions.

Comment #1: Groundwater Contaminant Concentration Trend Graphs *– The requested graphs are attached.*

Comment #2: Well Purging and Sampling Field Records for June 2015 – *The requested field records are attached.*

Comment #3: Revised Table 7: - *The requested revision to Table 7 for groundwater is attached as well as the revision for soil (see Comment #4.c.).*

Comment #4: Risk Reduction Standards for Soil: *- Compliance with Type 1 risk reduction standards for soil has been documented through the submittal of a Prospective Purchaser Compliance Status Report, dated July 31, 2017, prepared by Contour Engineering on behalf of the BOE.*

Amec Foster Wheeler Environment & Infrastructure, Inc.
2677 Buford Highway, NE
Atlanta, Georgia 30324
Tel: (404) 873-4761
www.amecfw.com

Comment #5: Clarify Current VRP Property Boundaries and Tax Parcel Information – *As discussed in the July 27, 2016 CSR, the HSI site at the time of listing was described as tax parcel 12-1993-0450-063-5, shown on Figure 1 as the combination of Parcel 1 and Parcel 2. After delineation, the HSI site now includes a second tax parcel 12-1993-0450-062-7, shown on Figure 1 as a combination of Tract A and Tract B.*

The property enrolled in the VRP was a portion of the HSI site. This Addendum requests that the VRP property be redefined to coincide with the same boundaries as the current HSI site.

In its July 31, 2017 CSR, the BOE established an undeveloped parcel of 2.63 acres designated Lot 2 on Figure 2 that is comprised of Parcel 2 and Tract A. Lot 2 encompasses the remaining groundwater plume and, therefore, is the subject of the Type 5 RRS certification on the attached Revised Certification Statement.

Lot 2 is also the subject of the groundwater restriction in the Draft Environmental Covenant. Lot 2 has not been assigned its own tax identification number, and only BOE can make that change.

In summary, the Lot 2 boundary survey attached as Figure 2 defines the boundaries of the Type 5 property for inclusion in the Environmental Covenant.

We respectfully request that the appropriate parties at the Environmental Protection Division (EPD) consider the attached responses at its earliest convenience.

Please contact us if further information or clarification is necessary.

Sincerely,

Amec Foster Wheeler Environment & Infrastructure, Inc.

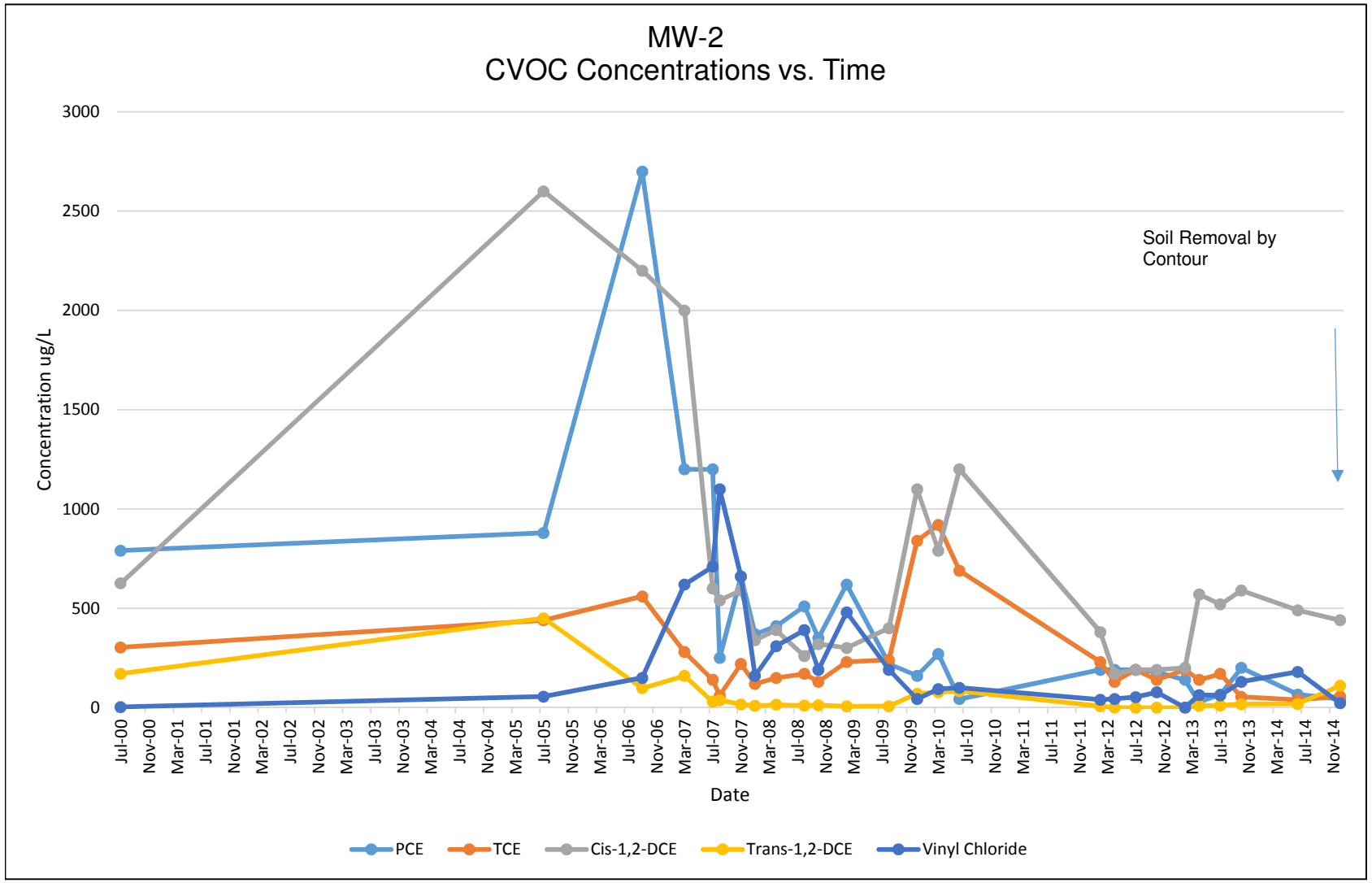
Stephen R. Foley, P.G.
Senior Geologist

Charles T. Ferry, P.E.
Senior Principal Engineer

Attachments: Groundwater Contaminant Concentration Trend Graphs
Well Purging and Sampling Records
Revised Table 7
Figure 1 – Tax Parcel Map
Figure 2 – Parcel 2 Boundary Survey
Revised Certification Statement

cc. Ms. Carolyn L. Daniels, P.G. - EPD
Ms. Joan Sasine, Esq. - Bryan Cave
Ms. Nancy Shannon - PM, Ltd.

CONTAMINANT CONCENTRATION TREND GRAPHS


MW-2
CVOC Concentrations vs. Time
Concentration ug/L
3000
2500
2000
1500
1000
500
0
Soil Removal by Contour
Jul-00
Nov-00
Mar-01
Jul-01
Nov-01
Mar-02
Jul-02
Nov-02
Mar-03
Jul-03
Nov-03
Mar-04
Jul-04
Nov-04
Mar-05
Jul-05
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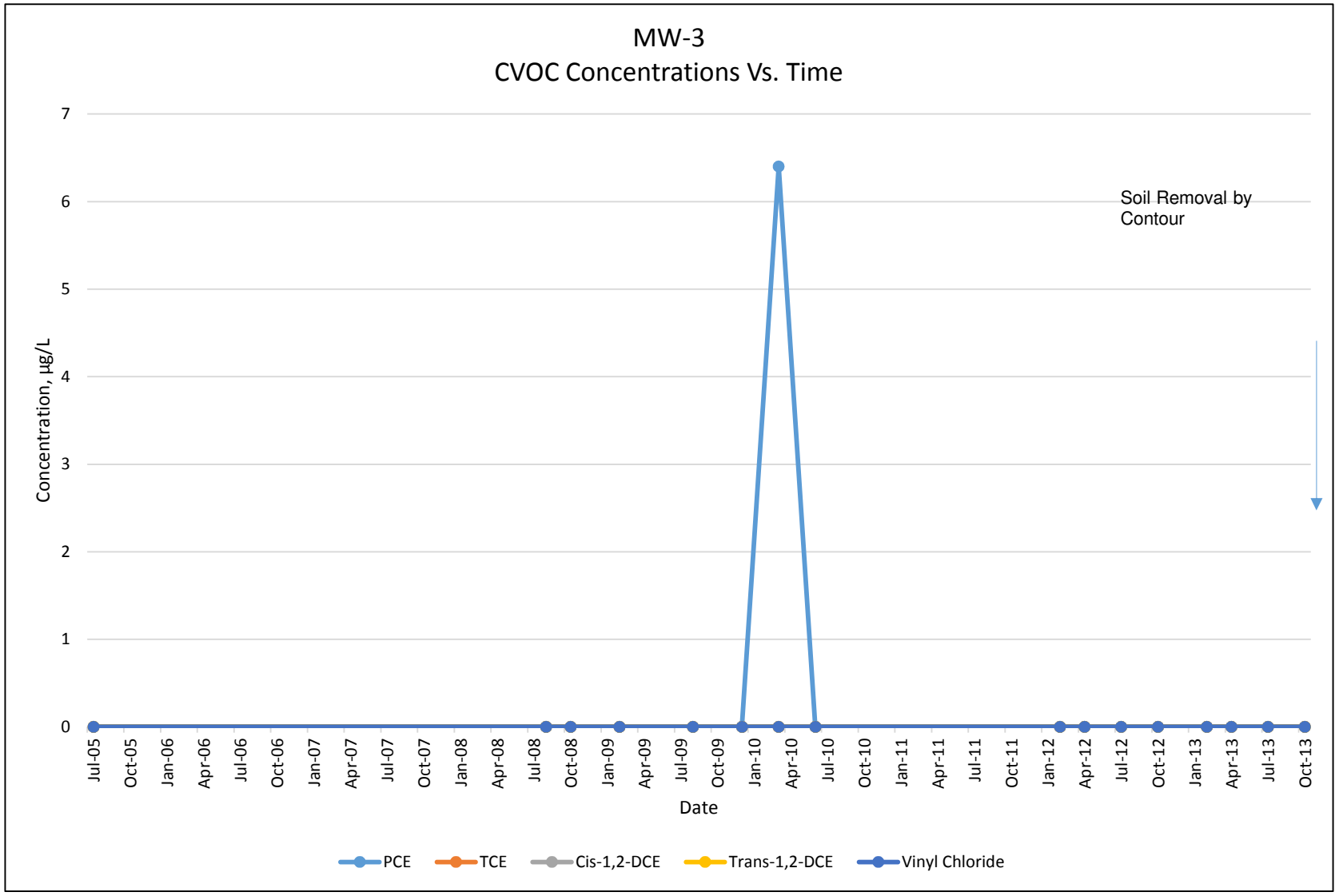
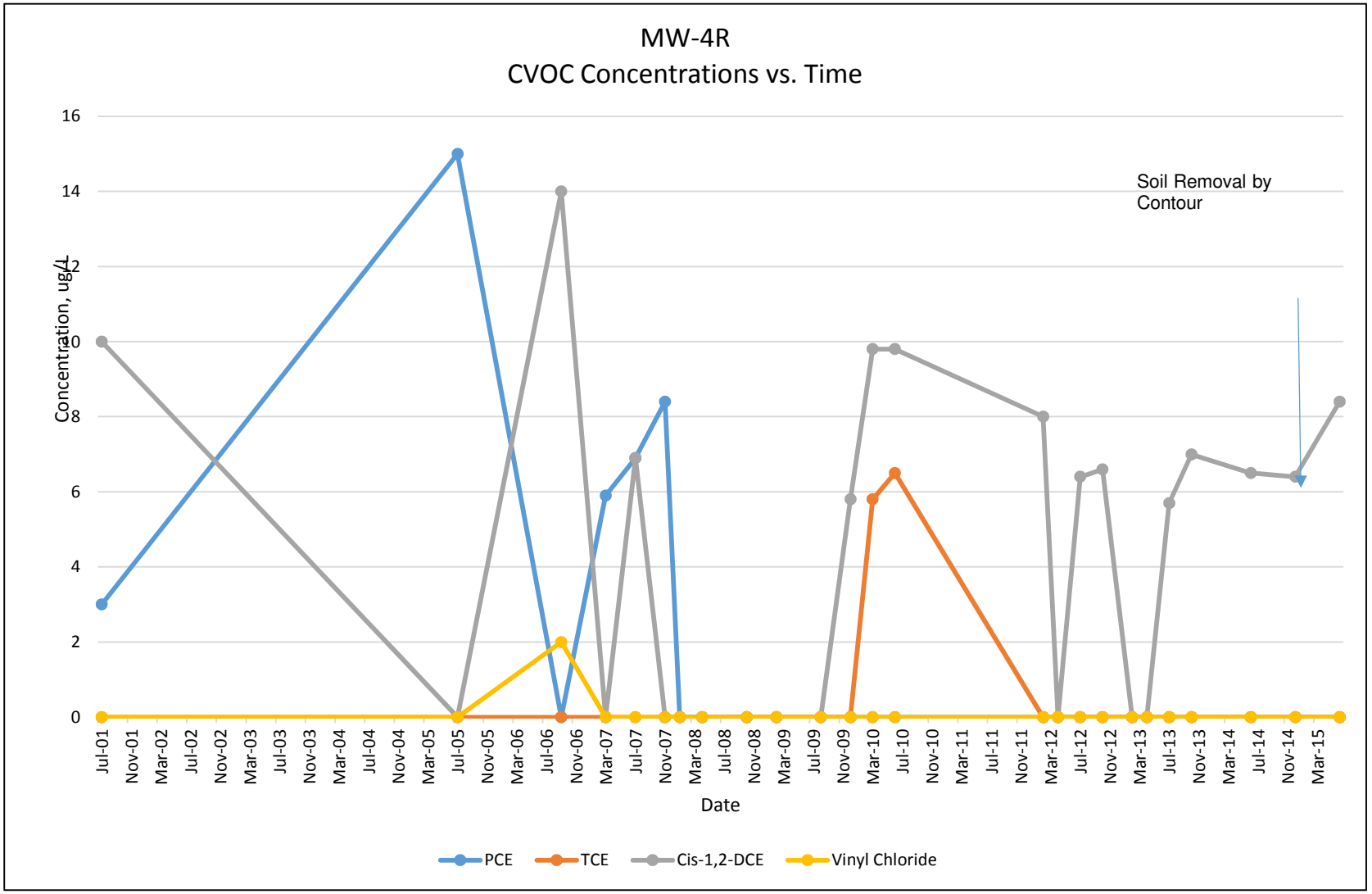
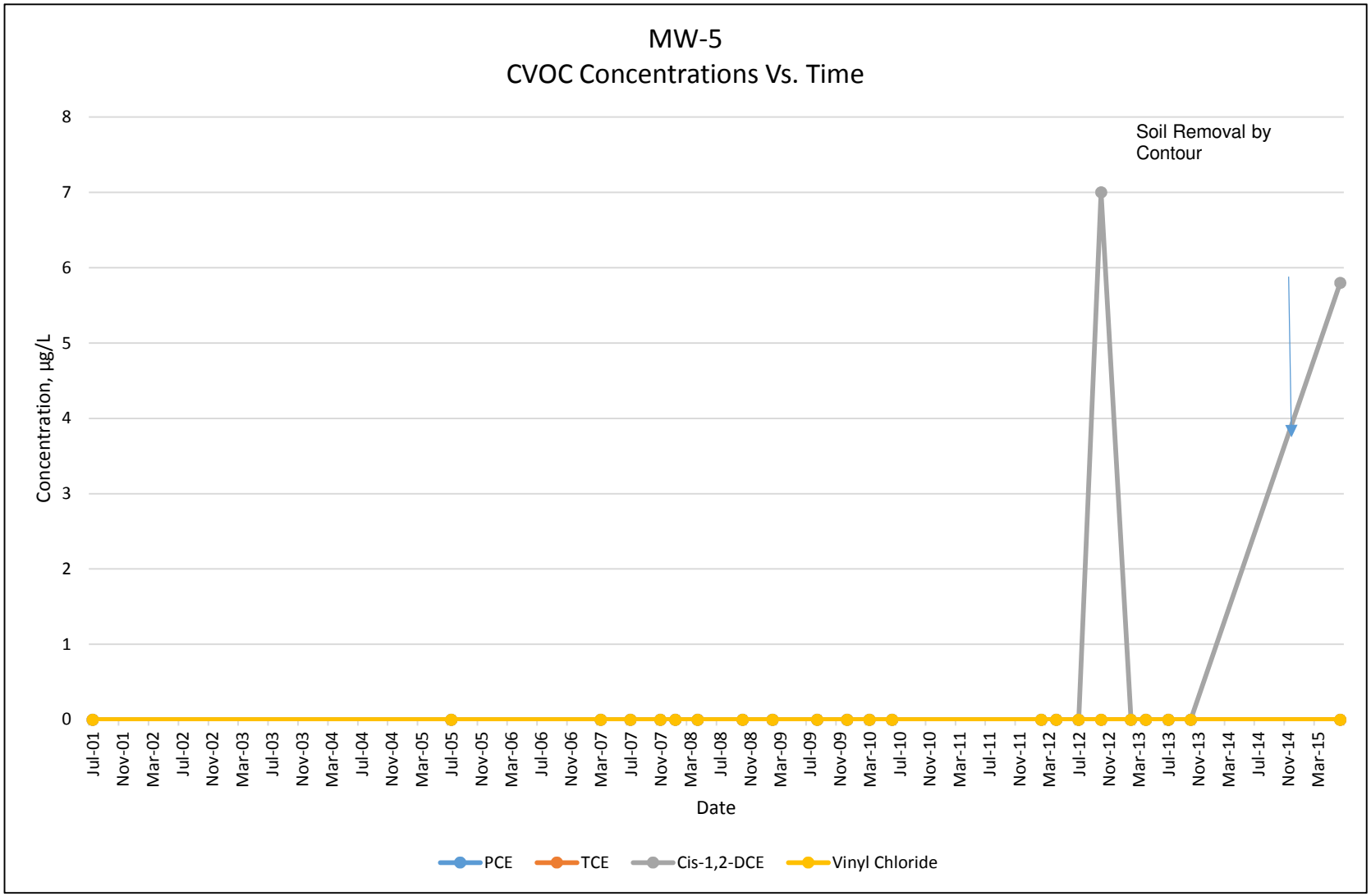
Mar-12
Jul-12
Nov-12
Mar-13
Jul-13
Nov-13
Mar-14
Jul-14
Nov-14
Date
PCE
TCE
Cis-1,2-DCE
Trans-1,2-DCE
Vinyl Chloride


MW-3
CVOC Concentrations Vs. Time
Concentration, µg/L
7
6
5
4
3
2
1
0
Soil Removal by Contour
Jul-05
Oct-05
Jan-06
Apr-06
Jul-06
Oct-06
Jan-07
Apr-07
Jul-07
Oct-07
Jan-08
Apr-08
Jul-08
Oct-08
Jan-09
Apr-09
Jul-09
Oct-09
Jan-10
Apr-10
Jul-10
Oct-10
Jan-11
Apr-11
Jul-11
Oct-11
Jan-12
Apr-12
Jul-12
Oct-12
Jan-13
Apr-13
Jul-13
Oct-13
Date
PCE
TCE
Cis-1,2-DCE
Trans-1,2-DCE
Vinyl Chloride


MW-4R
CVOC Concentrations vs. Time
Concentration, ug/L
Date
Soil Removal by Contour
PCE
TCE
Cis-1,2-DCE
Vinyl Chloride


MW-5
CVOC Concentrations Vs. Time
Soil Removal by Contour
Concentration, µg/L
0
1
2
3
4
5
6
7
8
Jul-01
Nov-01
Mar-02
Jul-02
Nov-02
Mar-03
Jul-03
Nov-03
Mar-04
Jul-04
Nov-04
Mar-05
Jul-05
Nov-05
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Mar-11
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Nov-11
Mar-12
Jul-12
Nov-12
Mar-13
Jul-13
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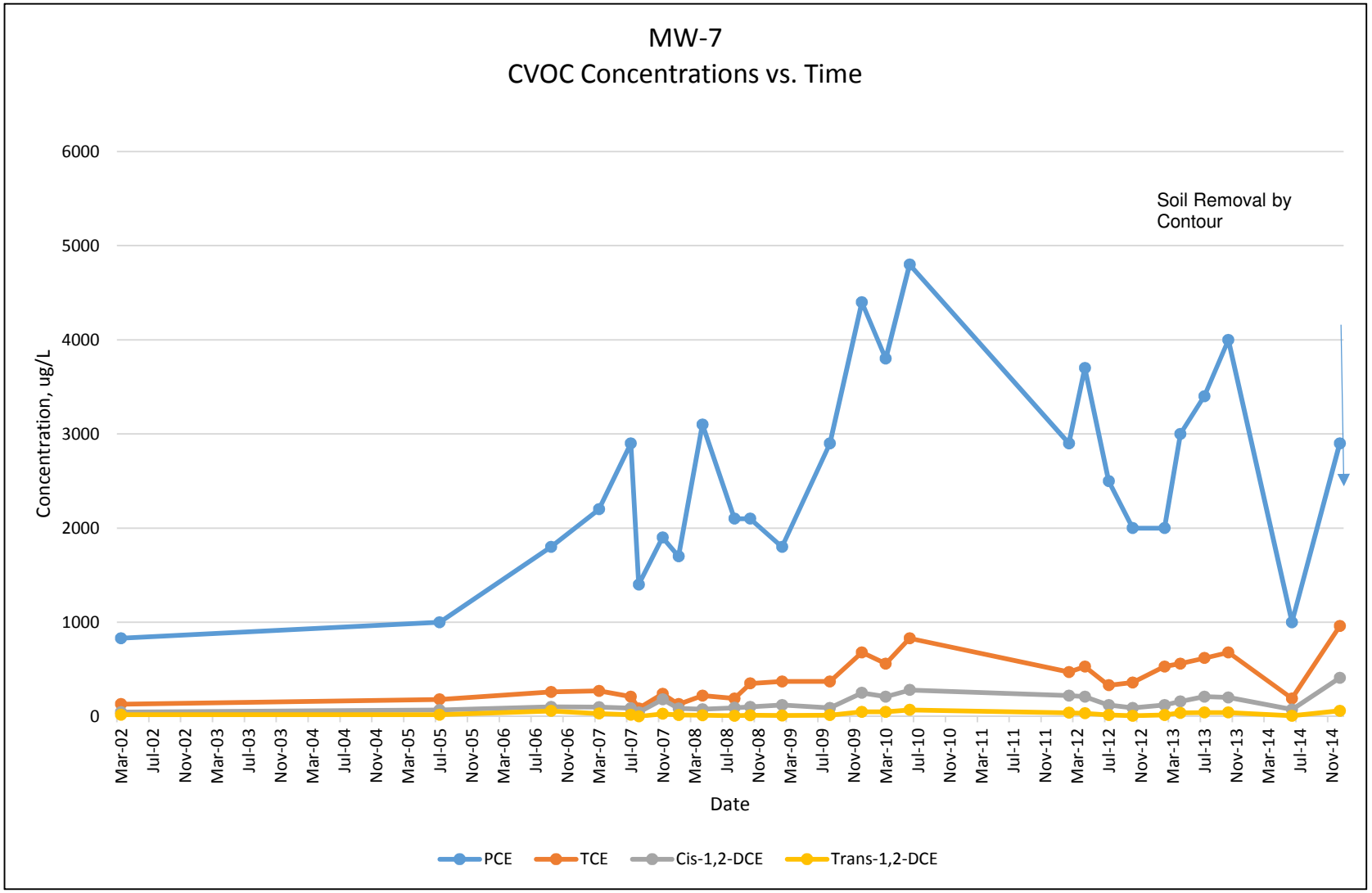
Mar-14
Jul-14
Nov-14
Mar-15
Date
PCE
TCE
Cis-1,2-DCE
Vinyl Chloride


MW-7
CVOC Concentrations vs. Time
Soil Removal by Contour
Concentration, ug/L
6000
5000
4000
3000
2000
1000
0
Mar-02
Jul-02
Nov-02
Mar-03
Jul-03
Nov-03
Mar-04
Jul-04
Nov-04
Mar-05
Jul-05
Nov-05
Mar-06
Jul-06
Nov-06
Mar-07
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Mar-11
Jul-11
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Mar-12
Jul-12
Nov-12
Mar-13
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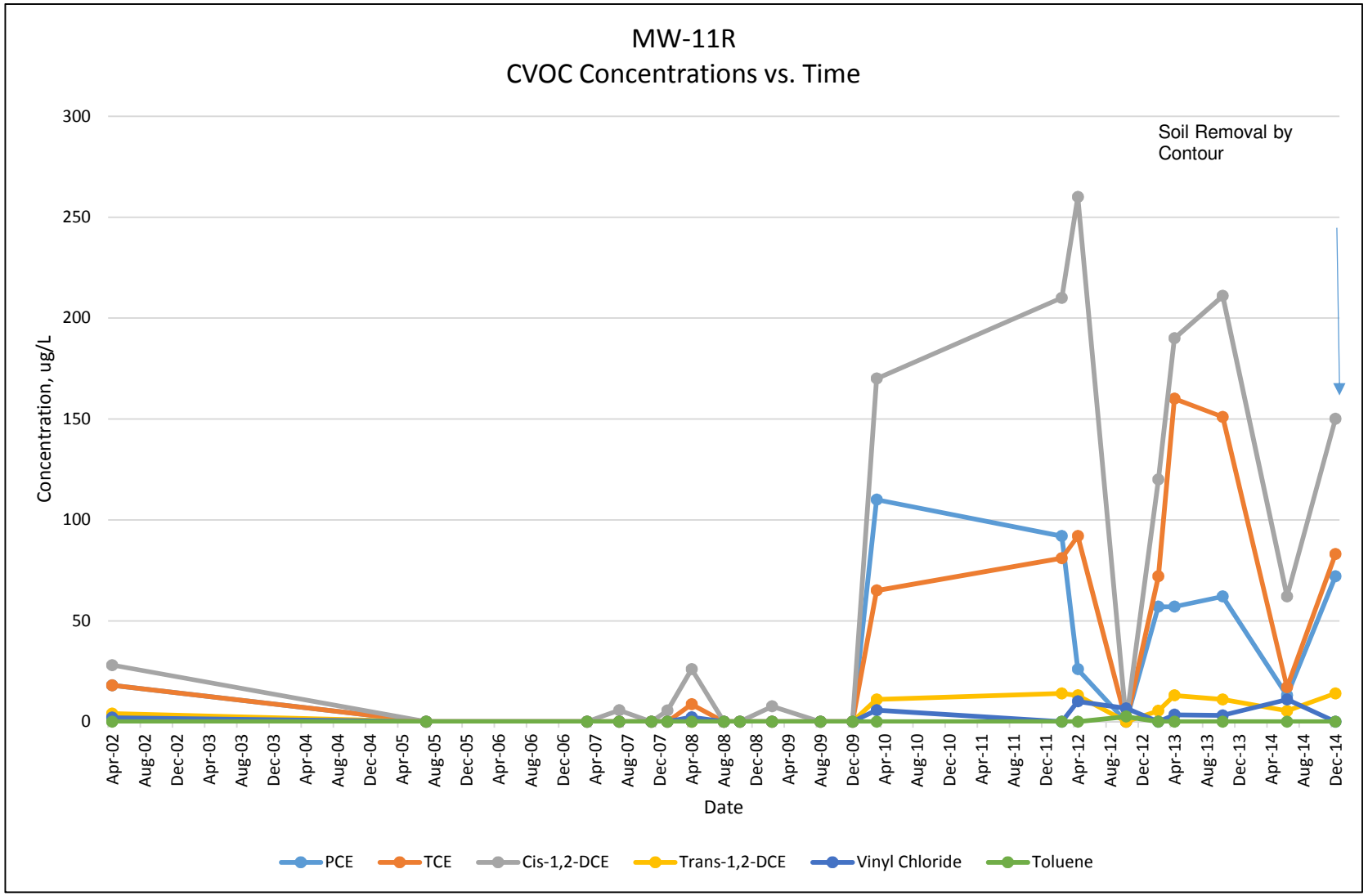
Mar-14
Jul-14
Nov-14
Date
PCE
TCE
Cis-1,2-DCE
Trans-1,2-DCE


MW-11R
CVOC Concentrations vs. Time
Soil Removal by Contour
Concentration, ug/L
300
250
200
150
100
50
0
Apr-02
Aug-02
Dec-02
Apr-03
Aug-03
Dec-03
Apr-04
Aug-04
Dec-04
Apr-05
Aug-05
Dec-05
Apr-06
Aug-06
Dec-06
Apr-07
Aug-07
Dec-07
Apr-08
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Apr-09
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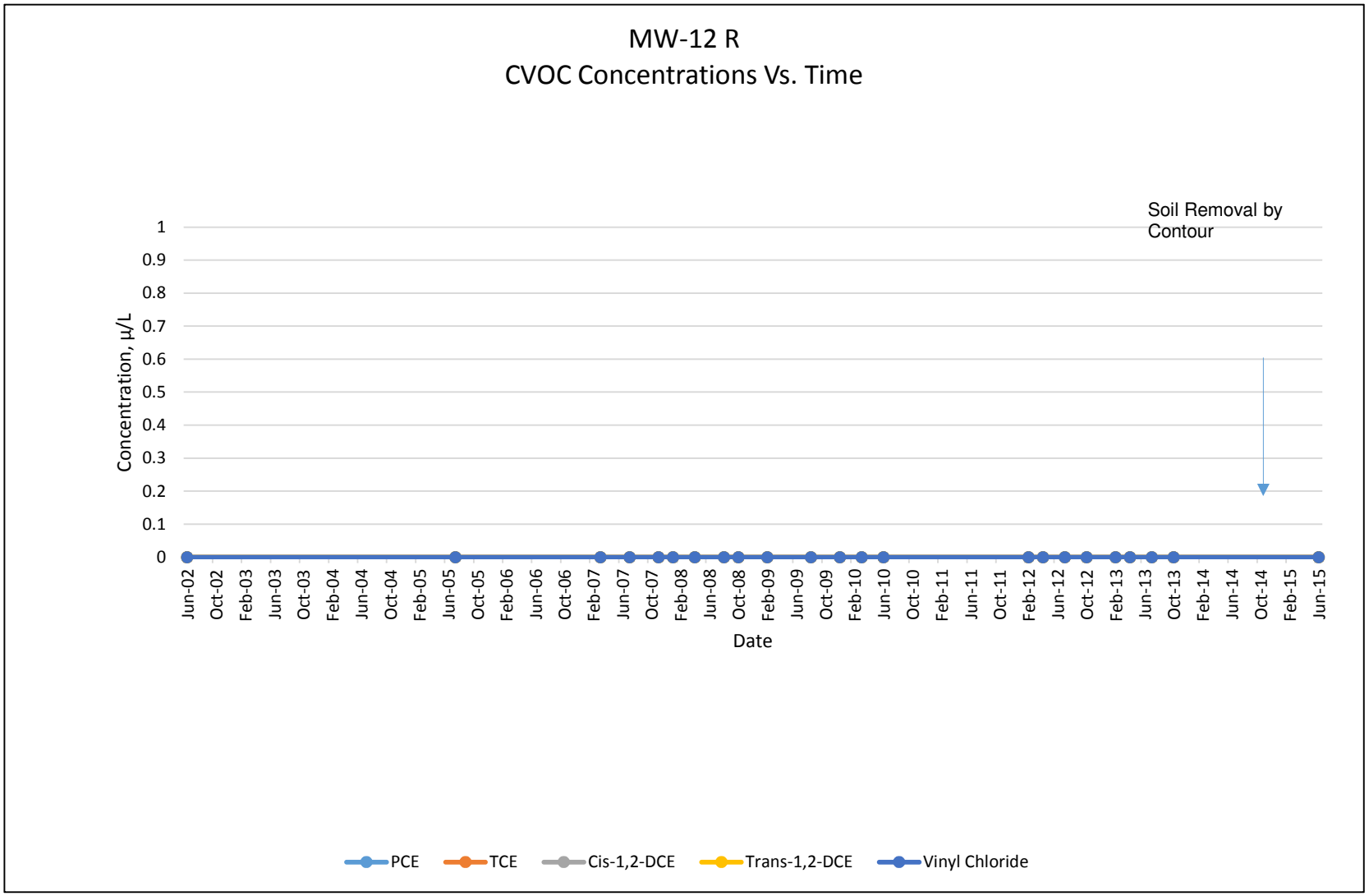
Dec-09
Apr-10
Aug-10
Dec-10
Apr-11
Aug-11
Dec-11
Apr-12
Aug-12
Dec-12
Apr-13
Aug-13
Dec-13
Apr-14
Aug-14
Dec-14
Date
PCE
TCE
Cis-1,2-DCE
Trans-1,2-DCE
Vinyl Chloride
Toluene


MW-12 R
CVOC Concentrations Vs. Time
Soil Removal by Contour
Concentration, µ/L
1
0.9
0.8
0.7
0.6
0.5
0.4
0.3
0.2
0.1
0
Jun-02
Oct-02
Feb-03
Jun-03
Oct-03
Feb-04
Jun-04
Oct-04
Feb-05
Jun-05
Oct-05
Feb-06
Jun-06
Oct-06
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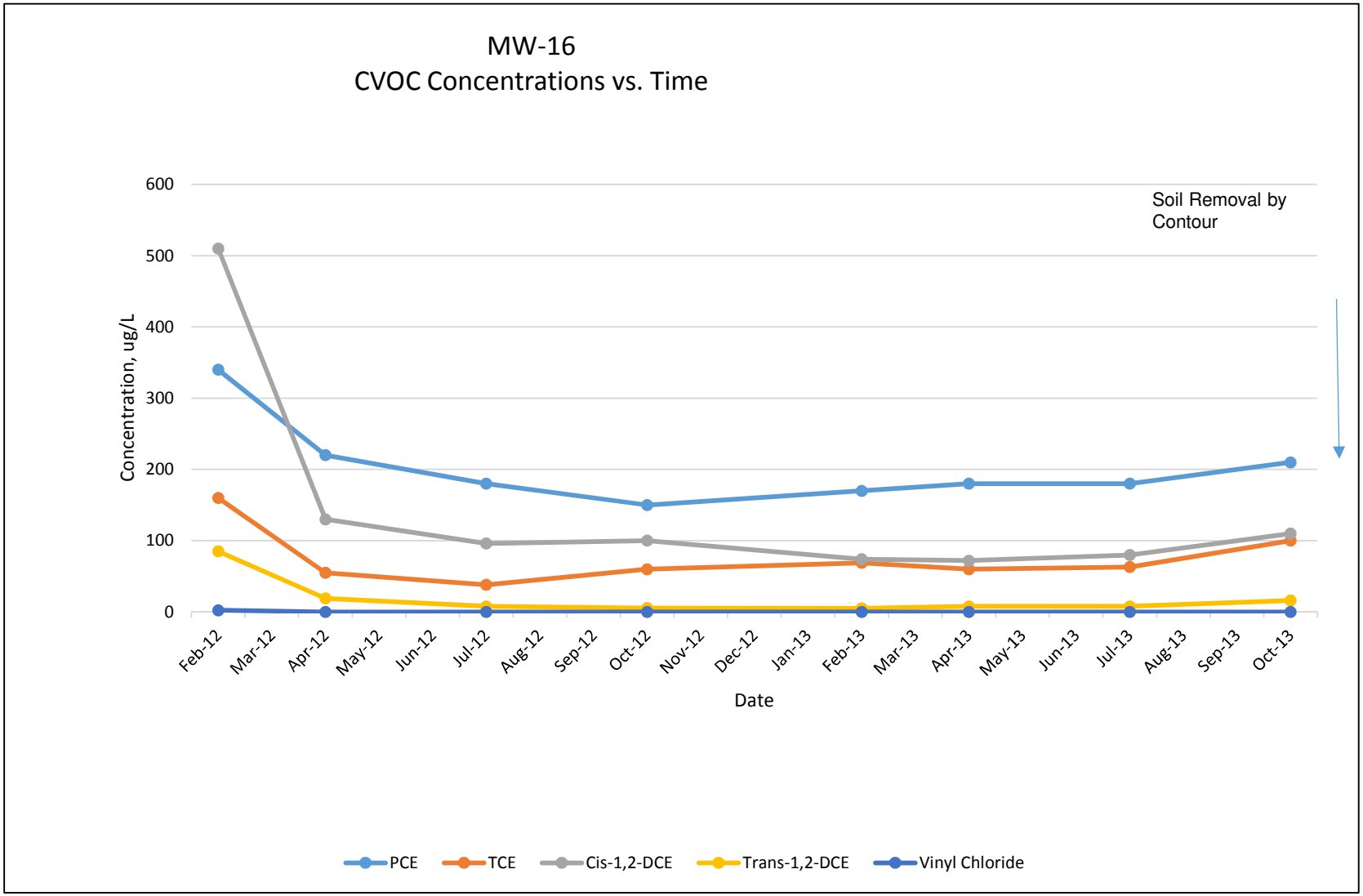
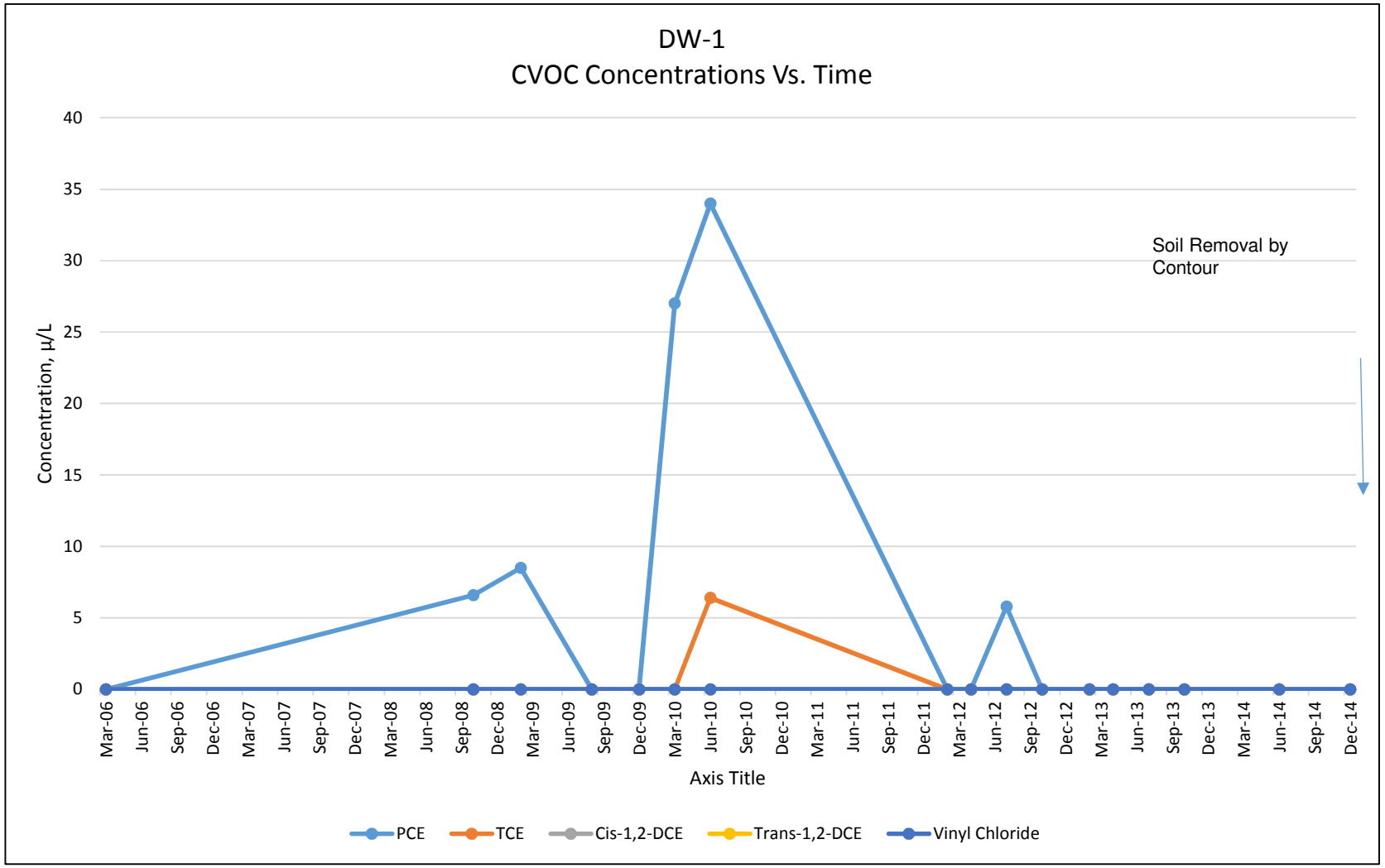
Feb-14
Jun-14
Oct-14
Feb-15
Jun-15
Date
PCE
TCE
Cis-1,2-DCE
Trans-1,2-DCE
Vinyl Chloride


MW-16
CVOC Concentrations vs. Time
Soil Removal by Contour
Concentration, ug/L
600
500
400
300
200
100
0
Feb-12
Mar-12
Apr-12
May-12
Jun-12
Jul-12
Aug-12
Sep-12
Oct-12
Nov-12
Dec-12
Jan-13
Feb-13
Mar-13
Apr-13
May-13
Jun-13
Jul-13
Aug-13
Sep-13
Oct-13
Date
PCE
TCE
Cis-1,2-DCE
Trans-1,2-DCE
Vinyl Chloride


DW-1
CVOC Concentrations Vs. Time
Concentration, µ/L
40
35
30
25
20
15
10
5
0
Soil Removal by Contour
Mar-06
Jun-06
Sep-06
Dec-06
Mar-07
Jun-07
Sep-07
Dec-07
Mar-08
Jun-08
Sep-08
Dec-08
Mar-09
Jun-09
Sep-09
Dec-09
Mar-10
Jun-10
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Mar-11
Jun-11
Sep-11
Dec-11
Mar-12
Jun-12
Sep-12
Dec-12
Mar-13
Jun-13
Sep-13
Dec-13
Mar-14
Jun-14
Sep-14
Dec-14
Axis Title
PCE
TCE
Cis-1,2-DCE
Trans-1,2-DCE
Vinyl Chloride

WELL PURGING AND SAMPLING RECORDS

WELL PURGING - FIELD WATER QUALITY MEASUREMENTS FORM

Location:

Identify Measuring Point (MP): TOC
(e.g. Top of Casing)

Well ID: MW-5
Field Sampling Personnel: S. Foley

Depth to Screen below MP: 5.3 of screen (Top) 8.3 of screen (Bottom)

Pump Intake at (ft. below MP): 7
Purging Device (Pump Type): _____
(e.g. Dedicated pump, peristaltic pump, bailer, bladder pump, etc.)

Well Depth, (Ft.) 8.3
Depth To Water (Ft.) 6.12
Water Column (Ft.) 2.18
Well Volume (gal) 0.35 X 3 = 1.05

Date	Time 24 hr	Depth to Water Below MP ft	Purge Rate mL/min	pH pH units	Spec Cond. mS/cm	Turbidity NTUs	DO Flow cell mg/L	Temp. °C	Redox Potential mV	Cum. Volume Purged gallons	CHEMetrics DO mg/L (low)	Hach Ferrous Iron mg/L	Comments
6/30/15	1030	6.12	150	5.31	0.147	34.3	15.10	20.10	81	0			
	1035	6.20		5.31	0.126	19.7	4.98	20.01	80	0.2			
	1040	6.23		5.20	0.119	15.4	3.12	19.97	98	0.4			
	1045	6.24		5.19	0.116	9.3	1.10	19.96	111	0.6			
	1050	6.26		5.01	0.113	7.9	0.95	19.82	133	0.8			
	1055	6.27		5.01	0.112	7.1	0.99	19.79	135	1.0			
	1100	6.27		4.99	0.112	5.9	0.97	19.77	138	1.2			Sample @ 1100

Notes:
Note when "Stabilization " has occurred. Stabilization Criteria (achieved after a minimum of three successive readings):

±0.1 for pH
±10 mV for redox
±3% for specific cond.
±10% for DO
<20 NTUs for turbidity
NA for temperature

If stabilization does not occur within 2 hours, contact Site Manager for action.
If well goes dry prior to stabilization, stop, allow well to recharge, and collect sample.

Well Casing Volume (Gal):
2" diameter well: Water column (ft.) x 0.163
4" diameter well: Water column x 0.653

WELL PURGING - FIELD WATER QUALITY MEASUREMENTS FORM

Location:

Identify Measuring Point (MP): TOC
(e.g. Top of Casing)

Well ID: MW-12

Field Sampling Personnel:

Depth to Screen below MP: 2.5 of screen (Top) 5.5 of screen (Bottom)

Pump Intake at (ft. below MP): 4.5

Purging Device (Pump Type):
(e.g. Dedicated pump, peristaltic pump, bailer, bladder pump, etc.)

Well Depth, (Ft.) 5.3
Depth To Water (Ft.) 3.90
Water Column (Ft.) 1.4
Well Volume (gal) 0.23 x 3 = 0.69

Date	Time 24 hr	Depth to Water Below MP ft	Purge Rate mL/min	pH pH units	Spec Cond. mS/cm	Turbidity NTUs	DO Flow cell mg/L	Temp. °C	Redox Potential mV	Cum. Volume Purged gallons	CHEMetrics DO mg/L (low)	Hach Ferrous Iron mg/L	Comments
6/30/15	1222	3.90	200	6.42	0.144	10.3	4.22	21.34	32	0			
	1230	4.03		6.73	0.175	6.1	2.18	20.97	30	0.2			
	1235	4.07		6.82	0.81	4.7	1.09	20.11	33	0.4			
	1240	4.10		6.86	0.192	4.3	0.95	19.75	34	0.6			
	1245	4.12		6.89	0.190	4.1	0.91	19.77	29	0.8			
	1250	4.12		6.88	0.191	3.7	0.92	19.74	28	1.0			SAMPLED @ 1250

Notes:
Note when "Stabilization " has occurred. Stabilization Criteria (achieved after a minimum of three successive readings):

±0.1 for pH
±10 mV for redox
±3% for specific cond.
±10% for DO
<20 NTUs for turbidity
NA for temperature

If stabilization does not occur within 2 hours, contact Site Manager for action.
If well goes dry prior to stabilization, stop, allow well to recharge, and collect sample.

Well Casing Volume (Gal):
2" diameter well: Water column (ft.) x 0.163
4" diameter well: Water column x 0.653

WELL PURGING - FIELD WATER QUALITY MEASUREMENTS FORM

Location:

Identify Measuring Point (MP): TOC
(e.g. Top of Casing)

Well ID: MW-4R
Field Sampling Personnel: J. Foley

Depth to Screen below MP: 5.5 of screen (Top) 10.5 of screen (Bottom)

Pump Intake at (ft. below MP): 9.5
Purging Device (Pump Type): _____
(e.g. Dedicated pump, peristaltic pump, bailer, bladder pump, etc.)

Well Depth, (Ft.) 10.5
Depth To Water (Ft.) 8.91
Water Column (Ft.) 1.59
Well Volume (gal) 0.26 x 3 = 0.78

Date	Time 24 hr	Depth to Water Below MP ft	Purge Rate mL/min	pH pH units	Spec Cond. mS/cm	Turbidity NTUs	DO Flow cell mg/L	Temp. °C	Redox Potential mV	Cum. Volume Purged gallons	CHEMetrics DO mg/L (low)	Hach Ferrous Iron mg/L	Comments
6/30/15	1115	8.91	150	5.24	0.071	39.5	10.42	21.12	48	0			
	1120	9.16		5.10	0.098	23.7	4.10	20.17	51	0.2			
	1125	9.20		5.01	0.121	20.2	1.16	19.89	59	0.4			
	1130	9.26		4.98	0.123	14.0	0.93	19.94	66	0.6			
	1135	9.28		4.96	0.120	11.9	0.87	19.99	68	0.8			
	1140	9.31		4.95	0.121	10.4	0.85	19.93	70	1.0			
	1145	9.33		4.95	0.121	9.2	0.81	19.91	73	1.2			Sample @ 1145

Notes:
Note when "Stabilization " has occurred. Stabilization Criteria (achieved after a minimum of three successive readings):

±0.1 for pH
±10 mV for redox
±3% for specific cond.
±10% for DO
<20 NTUs for turbidity
NA for temperature

If stabilization does not occur within 2 hours, contact Site Manager for action.
If well goes dry prior to stabilization, stop, allow well to recharge, and collect sample.

Well Casing Volume (Gal):
2" diameter well: Water column (ft.) x 0.163
4" diameter well: Water column x 0.653

TABLE

TABLE 7A – SUMMARY OF SOIL RISK REDUCTION STANDARDS

Regulated Substance	Highest Concentration Remaining on Site, µg/kg*	Location	Type 1 RRS Criteria, µg/kg (Residential Default)	Type 2 RRS Criteria, µg/kg (Residential Calculated)	Type 3 RRS Criteria, µg/kg (Non-Residential Default)	Type 4 RRS Criteria, µg/kg (Non-Residential Calculated)
Tetrachloroethene	345	SD-33	500	170	500	1,200
Trichloroethene	56.6	SD-15	500	36	500	37
Acetone	150	HA-3	400,000	33,000	400,000	190,000
Toluene	13	HA-3	100,000	14,000	100,000	72,000
Cis-1,2-Dichloroethene	11	CS-2	7,000	410	7,000	1,200
Ethylbenzene	6.21	SD-29	70,000	100,000	70,000	340,000
Xylenes	40.5	SD-29	1,000,000	200,000	1,000,000	200,000

µg/kg - micrograms per kilogram (equivalent to parts per billion)

*Concentrations represent the highest concentrations remaining in on-site soils following 2015 soil remediation conducted by Contour Engineering.

Note - Shaded values indicate compliance with RRS

TABLE 7B – SUMMARY OF GROUNDWATER RISK REDUCTION STANDARDS

Regulated Substance	Highest Concentration, µg/l	Location	Most Recent Concentration (December 2014)*	Type 1 RRS Criteria, µg/l (Residential Default)	Type 2 RRS Criteria, µg/l (Residential Calculated)	Type 3 RRS Criteria, µg/l (Non-Residential Default)	Type 4 RRS Criteria, µg/l (Non-Residential Calculated)
Tetrachloroethene	4,800	MW-7	2,900	5	19	5	98
Trichloroethene	960	MW-7	960	5	1	5	5.2
Cis-1,2-Dichloroethene	2,600	MW-2	440	70	31	70	200
Trans-1,2-Dichloroethene	450	MW-2	110	100	32	100	160
Vinyl Chloride	1,100	MW-2	22	2	1.1	2	3.3

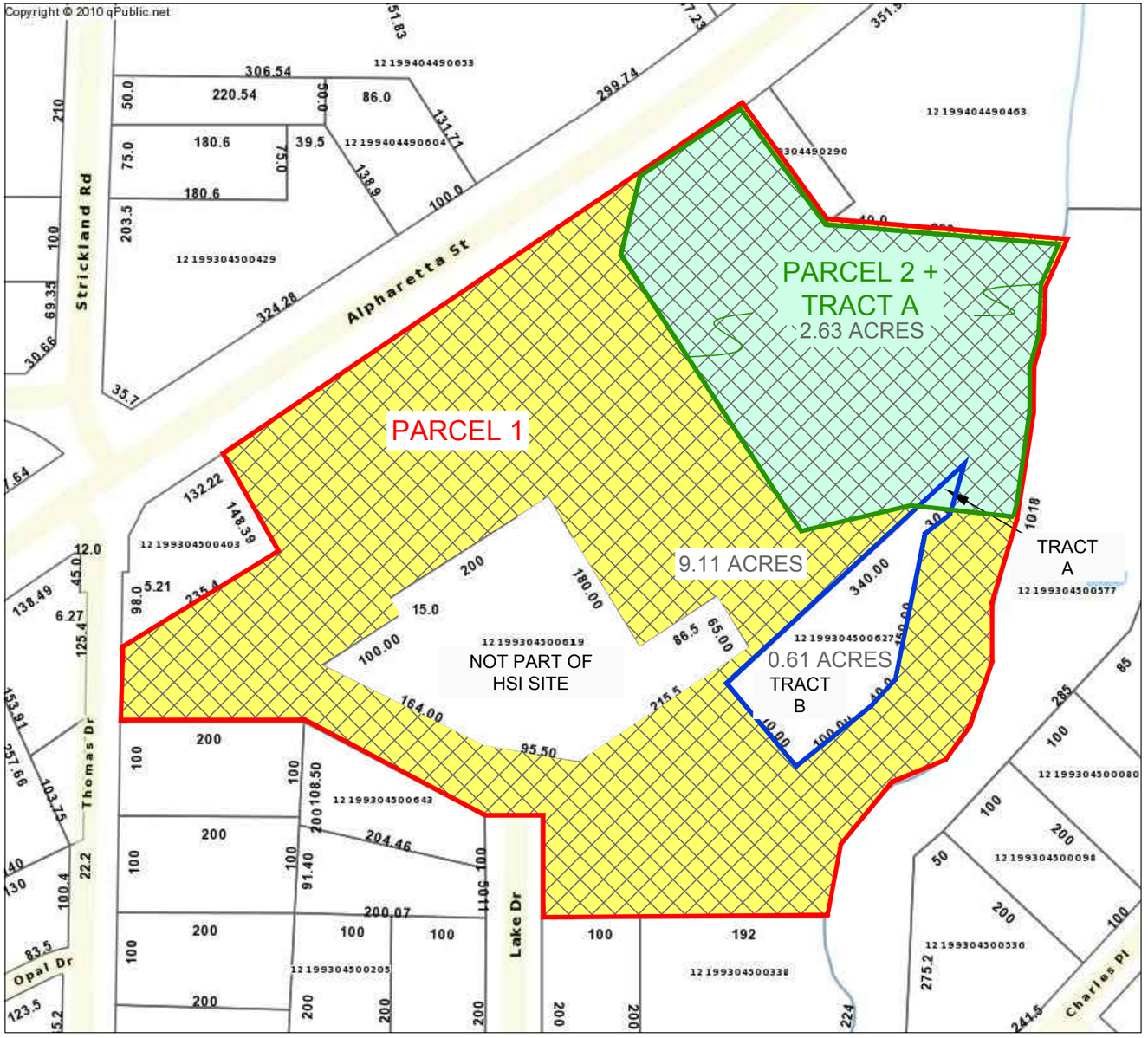
µg/L - micrograms per liter (equivalent to parts per billion)

* - Concentrations represent the highest concentrations remaining in on-site groundwater as of the final site-wide groundwater sampling event conducted in December 2014.

Note - Shaded values indicate compliance with RRS

FIGURES

J:\Imperial Cleaners\Tax Parcel Map.dwg – Layout1 07/25/2017 9:17am tonya.gladstone



N

LEGEND

- ORIGINAL 9.11 ACRE HSI SITE 12-1993-0450-063-5 (CURRENTLY LISTED AT 8.9986 ACRES)
- PARCEL 2 + TRACT A - 2.63 ACRES TYPE 5 AREA IN COVENANT
- TRACT A&B 0.61 ACRES 12-1993-0450-062-7 ADDED TO HSI SITE
- PARCEL 1

FORMER IMPERIAL CLEANERS
ROSWELL, GEORGIA

amec foster wheeler
Environment & Infrastructure, Inc.
2677 BUFORD HWY
ATLANTA, GEORGIA 30324 (404) 873-4761

TAX PARCEL MAP

JOB NO. 6305-05-0319 **FIGURE** 1

PREPARED BY/DATE

CHECKED BY/DATE

LINE	BEARING	DISTANCE
L1	S10°47'13"W	215.66'
L2	S06°43'52"W	67.85'
L3	S16°11'24"W	42.44'
L4	S07°01'38"W	101.40'
L5	S07°01'38"W	53.34'
L6	S39°38'26"W	50.74'
L7	S51°29'44"W	35.34'
L8	S42°55'02"W	100.76'
L9	S24°10'48"W	68.67'
L10	S03°00'18"W	40.46'
L11	S03°00'18"W	12.66'
L12	S02°48'09"E	32.38'
L13	S34°00'55"E	43.91'
L14	S06°34'10"W	48.28'
L15	S46°42'29"W	36.12'
L16	S41°48'28"W	53.10'
L17	S26°28'22"W	6.67'
L18	N15°43'35"E	46.60'
L19	N30°49'03"E	77.99'
L20	N39°08'39"E	51.61'
L21	N04°19'49"E	27.88'
L22	S57°55'42"E	26.32'
L23	S30°49'03"W	67.86'
L24	S30°49'03"W	24.94'
L25	N00°47'31"E	47.93'
L26	N01°27'26"E	125.25'
L27	N80°22'30"W	6.21'
L28	N00°30'33"E	44.40'
L29	N81°07'04"W	13.55'
L30	N57°39'48"E	79.09'

CURVE	ARC LENGTH	RADIUS	CHORD BEARING	CHORD LENGTH
C1	128.84'	147.93'	N08°23'54"W	124.81'
C2	107.87'	96.50'	S01°12'21"E	102.34'
C3	67.72'	131.55'	S15°53'38"W	66.98'

ALPHARETTA STREET
a.k.a. Georgia Hwy 9
(84' PUBLIC R/W & VARIES)
APPROXIMATE LAND LOT LINE
LL 449
LL 450
CONCRETE MEDIAN/TURN LANE
8"DIA
84.0'
N56°17'41"E 29.20'
N53°45'47"E 99.67'
5/8"RBR SET
N56°17'41"E 156.01'
N56°49'53"E 276.07'
30" CURB & GUTTER
S15°19'19"W 66.93'
MULTI-USE PATH PER DESIGN PLAN
Alexander & Zoltan Szecsey
N/F PROPERTY OF
DEED BOOK 51598 / PAGE 700
ZONED SH
1-STORY BRICK BUILDING
S40°26'50"E 155.23'
1"CTP FND
N/F PROPERTY OF
Thomas Family LLC
DEED BOOK 22391 / PAGE 266
ZONED SH
1-STORY FRAME BUILDING
S85°41'35"E 229.39'
#1221 ALPHARETTA ST.
N/F PROPERTY OF
FULTON COUNTY BOARD OF EDUCATION
LOT 2
BLOCK A
2.630 Acres
114,579 sf
ZONED SH
S32°15'16"E 338.45'
LIMITS OF SPECIAL FLOOD HAZARD AREA PER FLOOD MAP (ZONE AE)
150' IMPERVIOUS SETBACK
100' UNDISTURBED BUFFER
MULTI-USE PATH PER DESIGN PLAN
517.49' ALONG CENTERLINE CREEK
L1
HOG WALLOW CREEK
CENTERLINE OF CREEK IS PROPERTY LINE
427.35'± ALONG CENTERLINE CREEK
L2
L3
L4
L5
L6
L7
L8
L9
N/F PROPERTY OF
Maxwell M. Thomas
NO RECORDING DATA
ZONED R-2
5/8"RBR SET
N77°47'58"E 116.47'
S83°01'19"E 109.89'
5/8"RBR SET 30.0' ON-LINE
20.0'
50.0'
20' SEWER EASEMENT
50' CONSTRUCTION EASEMENT
STRICKLAND ROAD
(VARIABLE R/W)
CONCRETE MEDIAN/TURN LANE
30" CURB & GUTTER
N56°35'50"E 69.50'
1/2"RBR FND
N56°38'49"E 63.16'
5/8"RBR SET
N54°58'08"E 69.24'
L30
L21
L22
THOMAS DRIVE
(VARIABLE R/W)
C1
C2
C3
L29
#1191
LOT 3
BLOCK B
0.262 Acres
11,428 sq ft
ZONED SH
CMF 1/2"RBR
L28
L27
CMF
CMF
N/F PROPERTY OF
JOHN O. SMITH
DEED BOOK 13437 / PAGE 210
L26
L24
L23
L20
L19
5/8"RBR SET
20' SEWER EASEMENT
L25
L18
N00°30'46"E 28.45'
5/8"RBR SET
MATCH LINE
HIS
E 394
39.0'
1"CTP FND
20' SEWER EASEMENT
#1201 ALPHARETTA ST.
ROSWELL, GA 30075
N/F PROPERTY OF
FULTON COUNTY BOARD OF EDUCATION
LOT 1
BLOCK A
14.495 Acres
631,412 sf
ZONED CIV
LIMITS OF SPECIAL FLOOD HAZARD AREA PER FLOOD MAP (ZONE AE)
150' IMPERVIOUS SETBACK
100' UNDISTURBED BUFFER
MULTI-USE PATH PER DESIGN PLAN
MATCH LINE
SEE SHEET 3 OF 3
HOG WALLOW CREEK
GRID NORTH – GA. WEST ZONE

GRAPHIC SCALE

0 30 60 150 300

1"= 60'

GeoSurvey, Ltd.

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info@geosurvey.com
Certificate of Authorization #LS000621

REVISED CERTIFICATION STATEMENT

REVISED CERTIFICATION STATEMENT

I certify under penalty of law that this report and all attachments were prepared under my direction 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.

Based on my review of the findings of the July 26, 2016 CSR and the August 15, 2017 Addendum to Compliance Status Report prepared on behalf of PM, Ltd. and the July 31, 2017 CSR prepared on behalf of the Fulton County Board of Education with respect to the Rules for Hazardous Site Response, Rule 391-3-19-.07, I have determined that the following tax parcels are in compliance with Type 1 risk reduction standards for all constituents in soil and groundwater:

Tax Parcel ID No. 12-1993-0450-063-5 (Parcel 1)
Tax Parcel ID No. 12-1993-0450-062-7 (Tract B)

I have determined that the following tax parcels are in compliance with Type 1 risk reduction standards for all constituents in soil and Type 5 risk reduction standards for all constituents in groundwater:

Tax Parcel ID No. 12-1993-0450-063-5 (Parcel 2)
Tax Parcel ID No. 12-1993-0450-062-7 (Tract A)

PM, Ltd.

Joan Sasine

By Ms. Joan Sasine
Attorney for PM, Ltd.

8/15/17

Date