



Environment & Infrastructure Solutions
1075 Big Shanty Road, Suite 100
Kennesaw, Georgia 30144
USA

November 2, 2020

Mr. John Fonk
Unit Coordinator – Remedial Sites Unit
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive, SE
Suite 1054, East Tower
Atlanta, Georgia 30334

T: +1 770-421-3400

www.woodplc.com

Subject: **RCRA Part B Permit Renewal Application Revised Part A for EPD Review
Former Xerox Facility, Atlanta, Georgia
EPA I.D. No. GAD010103232**

Dear Mr. Fonk:

On behalf of our client, Xerox Corporation, we are submitting for EPD review the attached revised Part A of the RCRA Part B Permit Renewal Application for the former Xerox CRC facility (EPA I.D. No. GAD010103232) located on Fulton Industrial Boulevard in Atlanta, Georgia. This draft Part A has been revised as discussed during our conference call of October 8, 2020 and our follow-up call of October 27, 2020. Xerox has reviewed and approved this revised Part A for transmittal to EPD for review.

Please call us if you have any questions concerning this submittal.

Sincerely,

Wood Environment & Infrastructure Solutions, Inc.

John M. Quinn, P.G.
Senior Geologist

A. David Alcott
Principal

Attachment

cc: Julia Ispentchian – Xerox Corporation
Marcus Lathrop – Xerox Corporation



HAZARDOUS WASTE PERMIT PART A FORM

EPA ID Number

--	--	--	--	--	--	--	--	--	--	--

1. Facility Name

--

2. Reason for Submittal

<p>First-Time Applicant</p> <p>Modification (Check one) Class 1 not requiring approval Class 1 requiring approval Class 2 Class 3</p> <p>Renewal</p>

3. Facility Existence Date (mm/dd/yyyy)

		/			/				
--	--	---	--	--	---	--	--	--	--

4. Facility Status (Check all that apply)

<p>Operating TSD</p> <p>Post-Closure</p> <p>HSWA Corrective Action</p>

5. Facility Location Address

Street Address									
City	County	State	Zip Code						
Latitude		Longitude							
Land Type: <table> <tr> <td>Private</td> <td>Municipal</td> <td>County</td> <td>State</td> <td>Federal</td> <td>Other</td> </tr> </table>				Private	Municipal	County	State	Federal	Other
Private	Municipal	County	State	Federal	Other				

6. Facility Mailing Address

Same as Location Address

Street Address		
City	State	Zip Code

7. Facility Permit Contact

Full Name		Title	
Phone	Fax	Email	

8. Facility Permit Contact Mailing Address

Same as Location Address

Street Address		
City	State	Zip Code

9. Legal Owner and Operator of the Facility

Does the Facility have multiple owners and/or operators? If yes, please use Attachment 1. Yes ☐ No ☐

A. Name of Facility’s Legal Owner Same as Location Address ☐

Full Name		Date Became Owner							
		<input type="text"/>	<input type="text"/>	/	<input type="text"/>	<input type="text"/>	/	<input type="text"/>	<input type="text"/>
Are there any previous owners of this Facility? If yes, please list in an attachment. Yes <input type="checkbox"/> No <input type="checkbox"/>									
Owner Type <div>Private Municipal County State Federal Other</div>									
Street Address									
City									
State			Country			Zip Code			
Phone			Fax			Email			

B. Name of Facility’s Legal Operator Same as Facility’s Legal Owner ☐

Full Name		Date Became Operator							
		<input type="text"/>	<input type="text"/>	/	<input type="text"/>	<input type="text"/>	/	<input type="text"/>	<input type="text"/>
Are there any previous operators of this Facility? If yes, please list in an attachment. Yes <input type="checkbox"/> No <input type="checkbox"/>									
Operator Type <div>Private Municipal County State Federal Other</div>									
Street Address									
City									
State			Country			Zip Code			
Phone			Fax			Email			

10. North American Industry Classification System (NAICS) Code(s) for the Facility (at least 5-digit codes)

A. (Primary)	C.
B.	D.

11. Nature of Business

12. Other Environmental Permits

A. Permit Type	B. Permit Number																C. Description

13. Process Information

Line No.		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		

14. Description of Hazardous Wastes

Line No.		A. EPA Hazardous Waste Code				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes											
								(1) Process Codes								(2) Process Description (if code is not entered in 14.D1)			

15. Clean Closed Hazardous Waste Management Units (Do not include current Post-Closure Units)

Unit Name	Dates of Operation			Date of Clean Closure Certification, if applicable	Date of Clean Closure Equivalency Demonstration, if applicable
		to			
		to			
		to			
		to			

16. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the entire facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids under- ground. Include all springs, rivers, and other surface water bodies in this map area. Include drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the facility property boundary. USGS 7.5-minute series topographic or orthophotographic maps are available for all areas of the state.

17. Facility Drawing

All existing facilities must include a scale drawing of the facility showing the location of all past, present, and proposed treatment, storage, and disposal areas, including but not limited to solid waste management units and areas of concern.

18. Photographs

All existing facilities must include dated photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. Use the process codes listed in item 14 to indicate the location of all storage, treatment, and disposal areas.

19. List of Affected Governments

Full Name		Title
Street Address		
City	State	Zip Code

Full Name		Title
Street Address		
City	State	Zip Code

Full Name		Title
Street Address		
City	State	Zip Code

Full Name		Title
Street Address		
City	State	Zip Code

Full Name		Title
Street Address		
City	State	Zip Code

Full Name		Title
Street Address		
City	State	Zip Code

20. Comments (include item number for each comment)

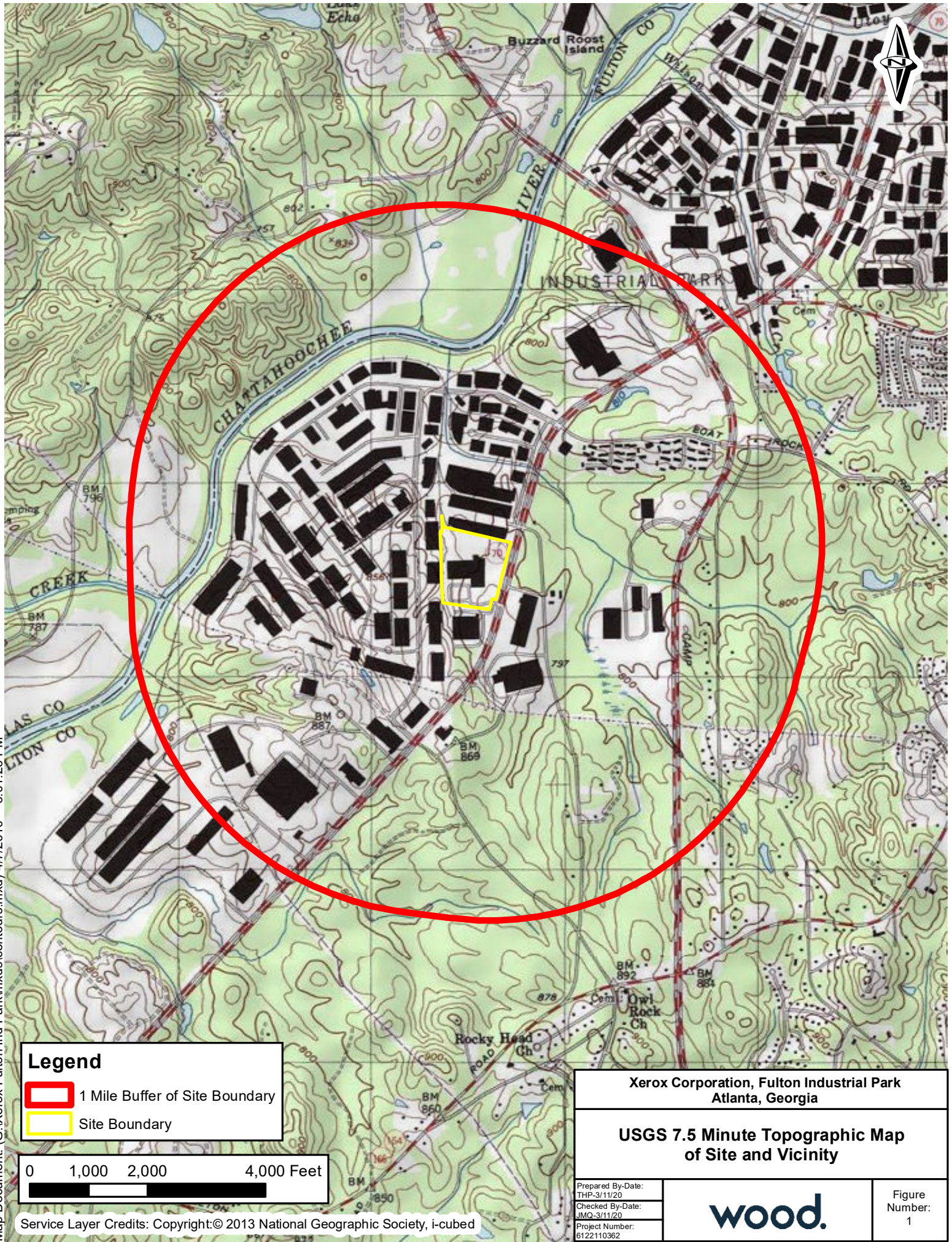
21. Certification I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial, Last)	Title



Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial, Last)	Title

FIGURES

FORMER XEROX-ATLANTA CRC HAZARDOUS WASTE PERMIT PART A



Legend

-  1 Mile Buffer of Site Boundary
-  Site Boundary

0 1,000 2,000 4,000 Feet

Service Layer Credits: Copyright:© 2013 National Geographic Society, i-cubed

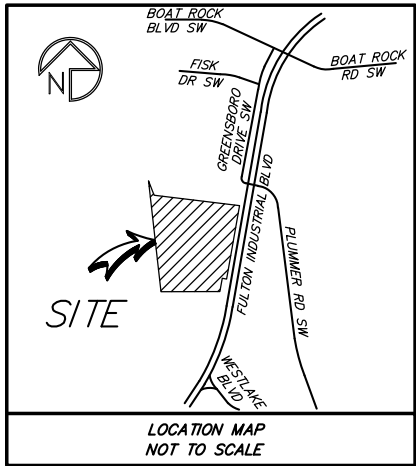
Xerox Corporation, Fulton Industrial Park
Atlanta, Georgia

USGS 7.5 Minute Topographic Map
of Site and Vicinity

Prepared By-Date:
THP-3/11/20
Checked By-Date:
JMQ-3/11/20
Project Number:
6122110362

wood.

Figure
Number:
1



THIS POST-CLOSURE CARE NOTICE IS PROVIDED IN ACCORDANCE WITH THE REQUIREMENTS OF 40 CFR 264.119(1):

- (I) THE LAND HAS BEEN USED TO MANAGE HAZARDOUS WASTE. SPECIFICALLY, A SOLVENT BLEND WAS USED IN FACILITY PARTS CLEANING OPERATIONS. THE PRODUCT SOLVENT BLEND WAS STORED IN A 10,000-GALLON UNDERGROUND STORAGE TANK LOCATED AT THE SOUTHEAST CORNER OF THE MANUFACTURING BUILDING AND TRANSFERRED THROUGH UNDERGROUND PIPING TO THE PARTS-CLEANING AREA (LOCATED INSIDE AND ADJACENT TO THE EAST SIDE OF THE BUILDING). THE SPENT SOLVENT WAS THEN RETURNED THROUGH UNDERGROUND PIPING TO A 12,000-GALLON UNDERGROUND STORAGE TANK LOCATED ADJACENT TO THE PRODUCT STORAGE TANK. THE CLOSURE ACTIVITIES INCLUDED REMOVAL AND DISPOSAL OF THE TANKS AND PIPING AND APPROXIMATELY 900 CUBIC YARDS OF POTENTIALLY IMPACTED SOILS. THE EXCAVATED AREAS WERE BACKFILLED AND COVERED WITH A CONCRETE CAP, THE "RCRA CAP". THE LIMITS OF THE AREA DESIGNATED AS THE HAZARDOUS WASTE REGULATED UNIT ARE IDENTIFIED ON THIS SURVEY.
- (II) THE USE OF THE PROPERTY IS RESTRICTED UNDER 40 CFR SUBPART G REGULATIONS.
- (III) THE SURVEY PLAT AND POST-CLOSURE CARE NOTICE HAVE BEEN FILED WITH FULTON COUNTY.

GRID NORTH
GEORGIA STATE PLANE
COORDINATE SYSTEM
(WEST ZONE)

LEGAL DESCRIPTION

All that tract or parcel of land lying and being in Land Lot 133 of the 14th District FF of Fulton County, Georgia, containing 0.0650 acres, and being more particularly described as follows:

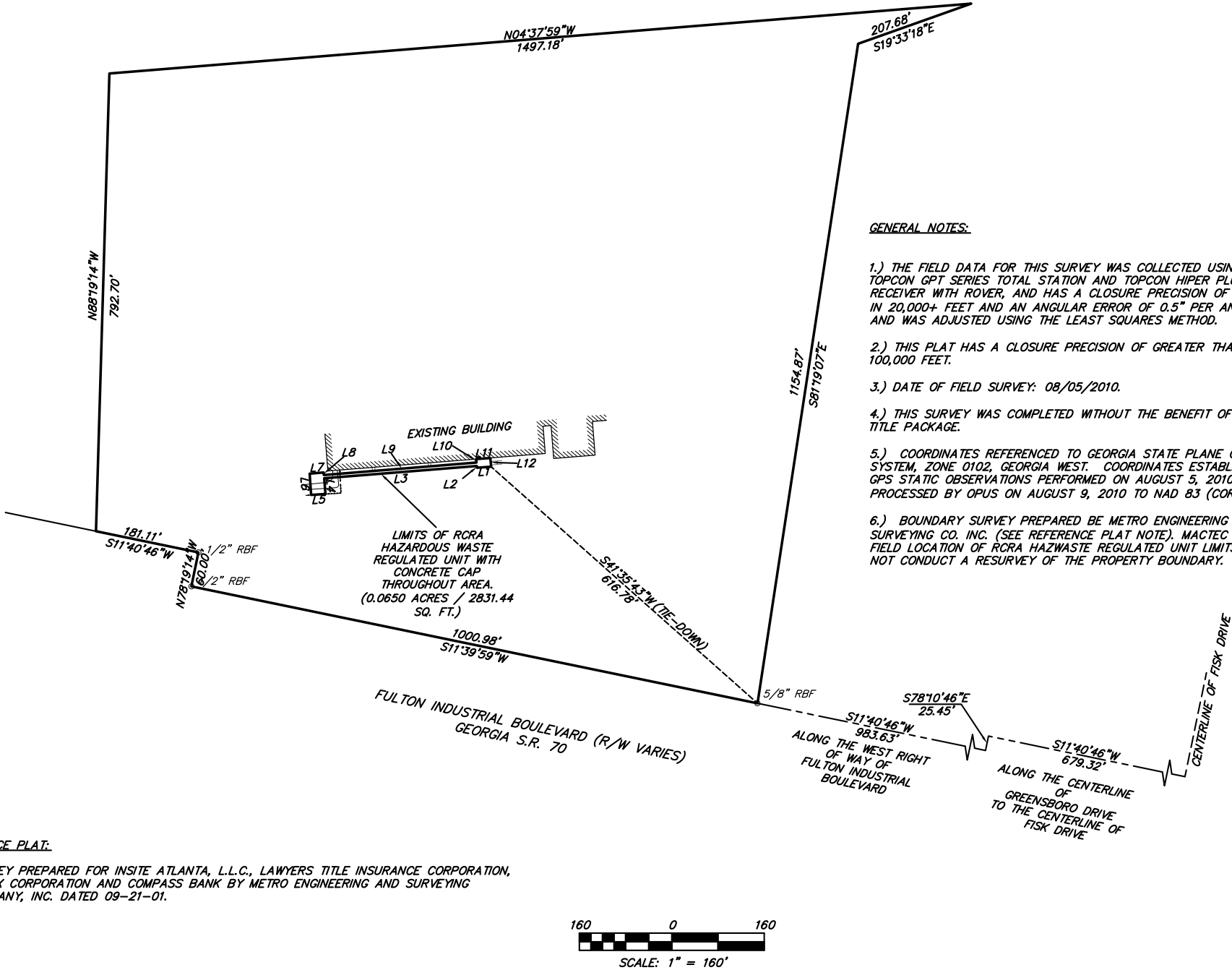
COMMENCING at a point which is the intersection of the centerline of Fisk Drive and the centerline of Greensboro Drive; thence running along the centerline of Greensboro Drive South 11°40'46" West a distance of 679.32 feet to a point; thence running South 78°10'46" East a distance of 25.45 feet to a point on the westerly right of way of Fulton Industrial Boulevard; thence running along said right of way South 11°40'46" West a distance of 983.63 feet to a 5/8" rebar found; thence leaving said right of way and running South 41°35'43" West a distance of 616.78 feet to a point on the corner of a concrete slab, said point being the TRUE POINT OF BEGINNING; thence running along the edge of said concrete slab South 3°58'35" East a distance of 24.53 feet to a point; thence continuing along the edge of said concrete slab South 83°48'31" West a distance 2.96 feet to a point; thence continuing along the edge of said concrete slab South 4°34'46" East a distance 265.11 feet to a point, thence continuing along the edge of said concrete slab North 85°28'10" East a distance 27.29 feet to a point, thence continuing along the edge of said concrete slab South 4°00'25" East a distance 24.90 feet to a point; thence continuing along the edge of said concrete slab South 86°01'38" West a distance 36.95 feet to a point; thence continuing along the edge of said concrete slab North 4°44'24" West a distance 24.42 feet to a point; thence continuing along the edge of said concrete slab North 85°37'50" East a distance 4.30 feet to a point; thence continuing along the edge of said concrete slab North 4°38'31" West a distance 265.15 feet to a point; thence continuing along the edge of said concrete slab South 85°07'26" West a distance 6.06 feet to a point; thence continuing along the edge of said concrete slab North 4°34'54" West a distance 24.60 feet to a point; thence continuing along the edge of said concrete slab North 84°52'35" East a distance 15.24 feet to a point which is the TRUE POINT OF BEGINNING.

Said parcel described being an area "Limits of RCRA Hazardous Waste Regulated Unit" currently capped with concrete. Reference bearings were taken from a survey for Insite Atlanta, L.L.C., Lawyers Title Insurance Corporation, Xerox Corporation and Compass Bank by Metro Engineering and Surveying Company, Inc. dated 09-21-01.

LINE TABLE		
LINE	LENGTH	BEARING
L1	24.53	S03°58'35"E
L2	2.96	S83°48'31"W
L3	265.11	S04°34'46"E
L4	27.29	N85°28'10"E
L5	24.90	S04°00'25"E
L6	36.95	S86°01'38"W
L7	24.42	N04°44'24"W
L8	4.30	N85°37'50"E
L9	265.15	N04°38'31"W
L10	6.06	S85°07'26"W
L11	24.60	N04°34'54"W
L12	15.24	N84°52'35"E

REFERENCE PLAT:

1. SURVEY PREPARED FOR INSITE ATLANTA, L.L.C., LAWYERS TITLE INSURANCE CORPORATION, XEROX CORPORATION AND COMPASS BANK BY METRO ENGINEERING AND SURVEYING COMPANY, INC. DATED 09-21-01.





SITE LOCATED IN LAND LOT 133
14th DISTRICT FF, FULTON COUNTY, GEORGIA.

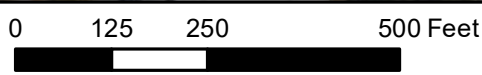
REV						SURVEYED K L FULLERTON		XEROX CORPORATION 6077 FULTON INDUSTRIAL BOULEVARD, FULTON COUNTY, GEORGIA	SURVEY OF LIMITS OF RCRA HAZARDOUS WASTE REGULATED UNIT	SCALE 1" = 160'
REV						DRAWN K L FULLERTON				
REV						CHECKED M E BARTENFELD		wood. ENVIRONMENT & INFRASTRUCTURE SOLUTIONS, INC. 1075 BIG SHANTY ROAD, NW, SUITE 100 KENNESAW, GEORGIA 30144 (770) 421-3400		CONTRACT 6122110362
REV						IN CHARGE F D SHIVER				
REV	DATE	BY	SUB	APP		DATE	08-09-10			DWG. NO. 2
										REV PAGE NO 1

J:\Xerox\MARCH 2020\Xerox 080510_SURVEY.dwg - Layout 2 03/26/2020 11:24am tonya.gladstone



Legend

-  Limits of RCRA Hazardous Waste Regulated Unit With Concrete Cap Throughout Area
-  Site Boundary



Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**Xerox Corporation, Fulton Industrial Park
Atlanta, Georgia**

**RCRA Hazardous Waste Regulated Unit
Aerial Image 11/28/18**

Prepared By-Date:
THP-3/11/20
Checked By-Date:
JMQ-3/11/20
Project Number:
6122110362



Figure
Number:
3

ATTACHMENT 1

**DISCUSSION OF THE VOLUME OF POTENTIALLY CONTAMINATED SOILS REMAINING AT
THE SITE**

FORMER XEROX-ATLANTA CRC HAZARDOUS WASTE PERMIT PART A

Discussion of the Volume of Potentially Contaminated Soils at the Site

The volume of potentially contaminated soils at the site was estimated by examining three areas of former releases as described below and shown on attached Figure A-1;

- Former area of two USTs,
- Area(s) of leak from pipeline between former USTs and elbow bend, and
- Leak at elbow bend in solvent return pipeline.

Former Area of Two USTs.

- Soils were removed from above and adjacent to former USTs during tank closure (removal) in 1984. The water table at that time was at about 3 feet below ground surface (bgs). Groundwater from the excavation was sampled and analyzed, with 163 ug/L of tetrachloroethene (PCE); 30 ug/L of trichloroethene (TCE) and 35 ug/L of 1,1,1-trichloroethane (TCA) detected in the sample.
- Tanks tightness testing was conducted prior to tank removal, with no leaks detected. The constituents detected in the groundwater sample described above are thought to be associated with leak(s) during tank filling operations.
- A Supplemental Soil Investigation was conducted in 2011, with two direct push technology (DPT) borings (DPT-1 and DPT-2) advanced adjacent to the former tanks excavation (Figure A-2). There were no volatile organic compound (VOC) detections at DPT-1 and DPT-2. Based on these data, no volume of potentially impacted soil is assumed at this location.

Area(s) of leak from pipeline between former USTs and elbow bend.

- To assess source(s) of groundwater impacts observed in the subject area between the former USTs and the elbow bend, eleven hydropunch boring were advanced in February and March 1998 at locations shown of Figure A-3. Soil samples were collected from approximate depths of 2, 5, 10, and 15 feet and scanned with a photoionization detector (PID). Samples for testing for VOCs were selected based on PID results. The results are shown on a table on Figure A-3. EPA Method 8010 VOCs were not detected in any of the soil samples. Elevated PCE concentrations were detected in groundwater samples collected at three of the hydropunch locations (HP-2, HP-5 and HP-7). Subsequently, in April 1998, two 2-PHASE recovery wells (B-38 and B-39, shown on Figure A-4) were installed in these elevated VOC locations and operated until the recovery systems were discontinued the following year.
- While PCE-impacted groundwater was detected during the investigations conducted along this portion of the pipeline, an area(s) of a specific impact to soil was not located. Subsequent corrective actions (2-PHASE extraction) were implemented from recovery wells installed in the suspect area, with the well locations based on constituent

concentration in groundwater. Based on the results of the hydropunch investigation and subsequent corrective actions, it is very likely that the extent of VOCs in soils along the pipeline between the USTs and the elbow bend, if any, is limited to a very discrete area. An estimate of the volume of potentially contaminated soil remaining in the pipeline area between the USTs and the elbow bend is based on the following:

1. The width of the potentially impacted area is estimated to be approximately 6 feet, the width of the excavation made to remove the pipelines and adjacent soils;
2. the depth of soil would be 6 feet (the soils and pipelines were excavated to a depth of 4 feet, leaving 6 feet from the base of that excavation down to the water table at 10 feet, and;
3. The length of the remaining potentially impacted area is estimated to be no more than approximately 20 feet based on the absence of soils detected in analyses of the hydropunch soil samples, the absence of comments by those excavating the pipeline and adjacent soils of any evidence of a release, and the limited impact to groundwater subsequently detected in this area (relative to the impact observed in the elbow bend area).

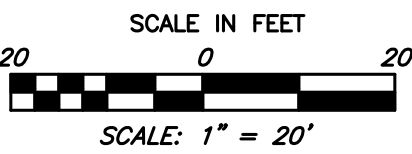
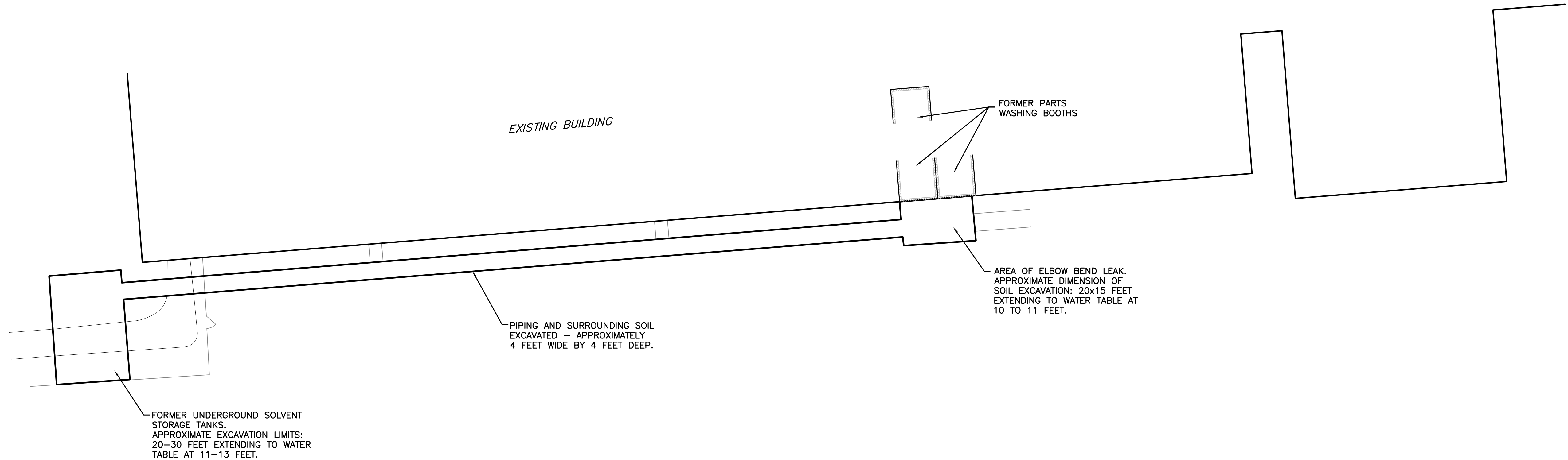
The resulting estimate of the volume of potentially impacted soils remaining in the former pipeline area is approximately 27 cubic yards (6 feet by 6 feet by 20 feet).

Leak in elbow bend of solvent return line.

- In 1984, soils impacted by the release from the elbow bend in the return solvent line were excavated to the extent possible, creating an excavation having approximate dimensions of 20 by 15 feet and extending down to groundwater at approximately 10 feet bgs. Soil samples collected from the four sidewalls of the pit excavation had PCE concentrations ranging from 64 to 76,000 ug/Kg (Figure A-3). In 1986, 13 A- and B-Series shallow borings were drilled to the north, east, and south of the former pit excavation. VOCs were not detected in samples collected from a depth of five feet in the 7 borings located on the north and east sides of the former excavation. PCE was detected in two of the six borings drilled to the south, at 10.4 and 23 ug/kg (Figure A-3).
- In 2011, ten DPT borings were installed in the area of the former pit excavation to collect soil and temporary groundwater samples (DPT -3, 4, 5,6,7,8,9 and GW -1,2, and 3; Figure A-2). PCE was detected at DPT-8 at 37 ug/Kg in the 2-foot depth soil sample. PCE was not detected in the groundwater sample collected from GW-1; but was detected at a concentration of 11 ug/L in the GW-2 sample and 180 ug/L in the GW-3 sample.
- To estimate the area/volume of potentially contaminated soils remaining in the former elbow bend release area, it was assumed the potentially impacted soils are only located approximately inside a rectangular area bounded by DPT-3, DPT-4, DPT-5, GW-1, GW-2, and DPT-8 (as PCE was only detected at a low level [37 ug/Kg] and only at the 2-foot depth in DPT-8, it is assumed that potential soil contamination does not extend beyond the DPT-8 location). Assuming that the groundwater table is at 10 feet bgs and

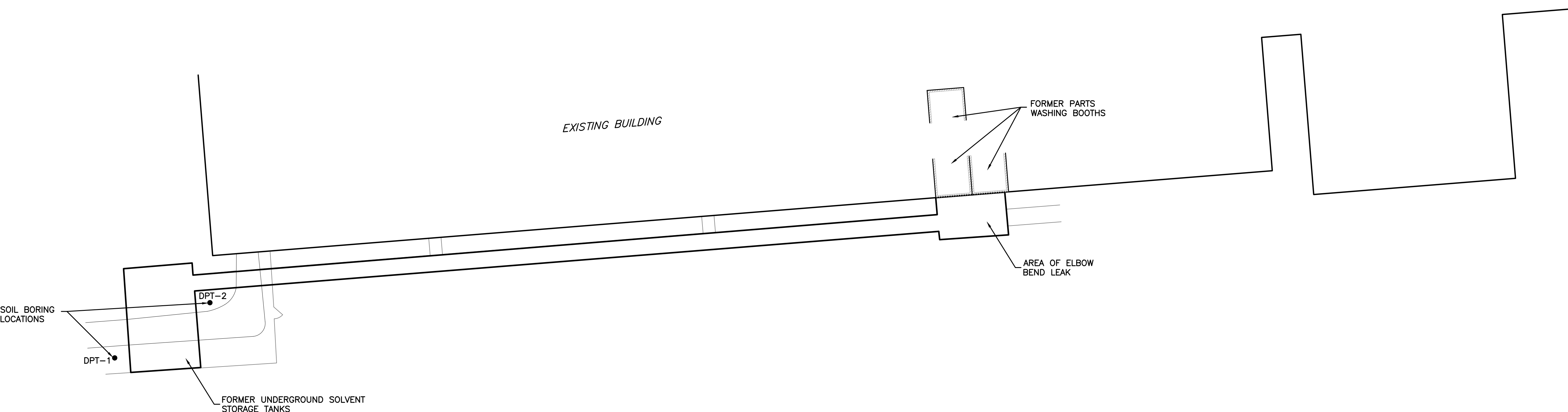
excluding the volume (approximately 111 cubic yards) of the filled pit excavation, a volume of approximately 205 cu. yds. of potentially contaminated soils is calculated in the elbow bend release area.


With an estimated approximate volume of 27 cubic yards in the area between the former USTs and the elbow bend, and 205 cubic yards in the elbow bend release area, a total estimated volume of 232 cubic yards of potentially contaminated soils may remain at the site. Considering the several years of operation of the 2-PHASE recovery system in several wells in the area of the pit excavation and former parts washers and the limited and single to double digit concentrations of PCE detected in soil samples collected from other borings in this area, it is believed to be unlikely that contaminants remain at concentration above U.S. EPA residential Regional Screening Levels (RSLs).

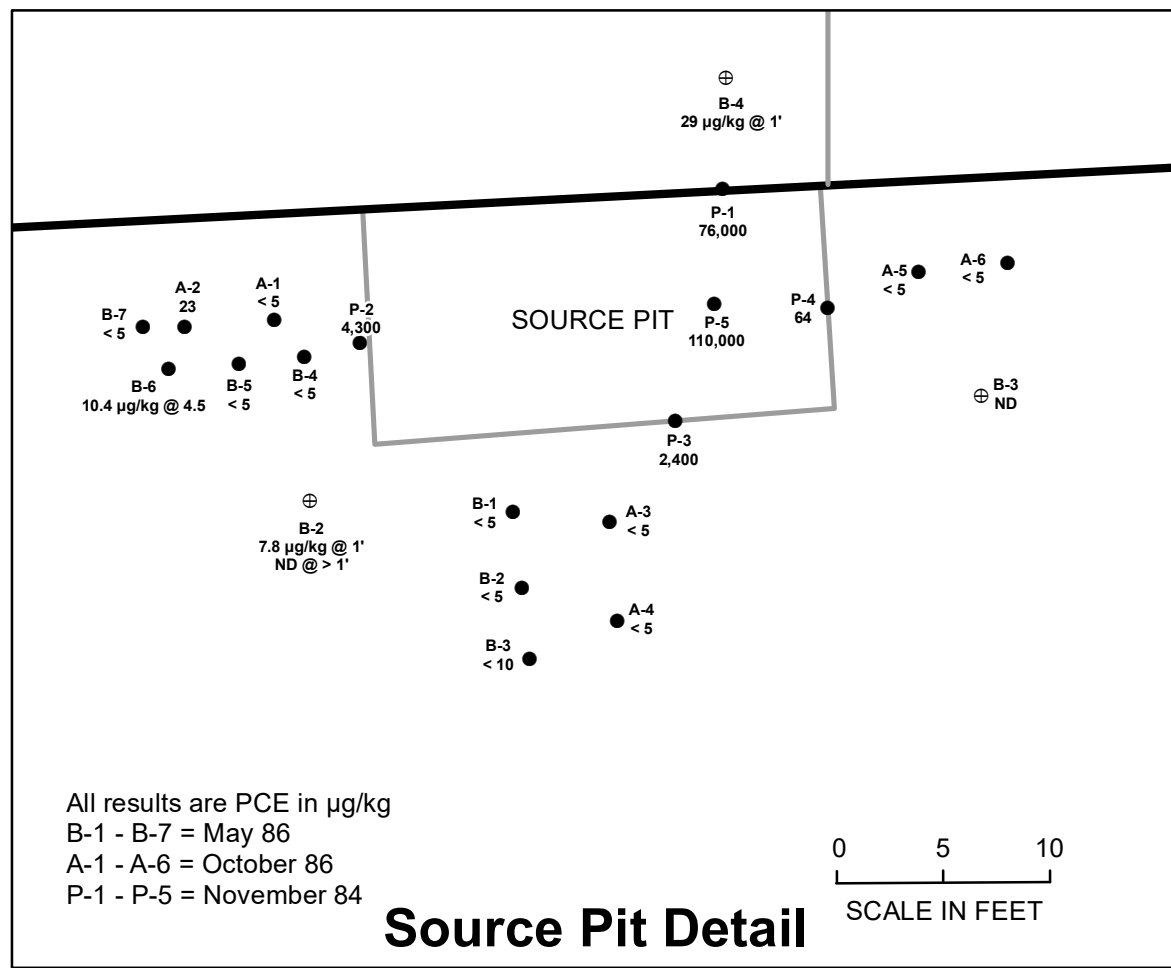


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DESIGNED T. GLADSTONE	XEROX CORPORATION		1984 UST, PIPING AND ASSOCIATED SOIL CLOSURE ACTIVITIES	SCALE AS SHOWN	
DRAWN	6077 FULTON INDUSTRIAL BOULEVARD, FULTON COUNTY, GEORGIA			CONTRACT 6122-11-0362	
CHECKED D. ALCOTT	wood.	Environment & Infrastructure Solutions, Inc. 1075 BIG SHANTY ROAD, NW, SUITE 100 KENNESAW, GEORGIA 30144 (770) 421-3400		DWG. NO. REV PAGE NO.	
IN CHARGE D. ALCOTT				FIG A-1	
DATE 4/27/2020					



DESIGNED T. GLADSTONE		XEROX CORPORATION 6077 FULTON INDUSTRIAL BOULEVARD, FULTON COUNTY, GEORGIA ENVIRONMENT & INFRASTRUCTURE, INC. 1075 BIG SHANTY ROAD, NW, SUITE 100 KENNESAW, GEORGIA 30144 (770) 421-3400	SUPPLEMENTAL INVESTIGATION BORING/ WELL LOCATIONS	SCALE AS SHOWN
DRAWN				CONTRACT 6122-11-0362
CHECKED J. QUINN				DWG. NO. REV PAGE
IN CHARGE D. ALCOTT				FIG. A-2
DATE 4/22/2020				



LEGEND

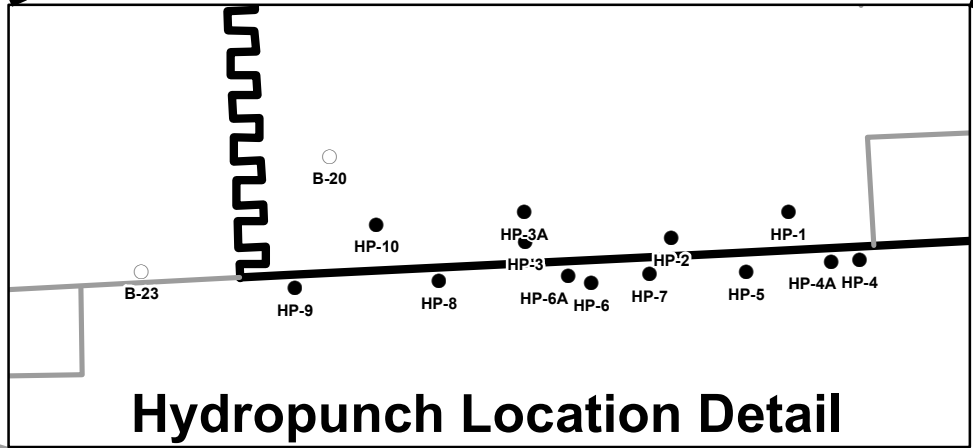
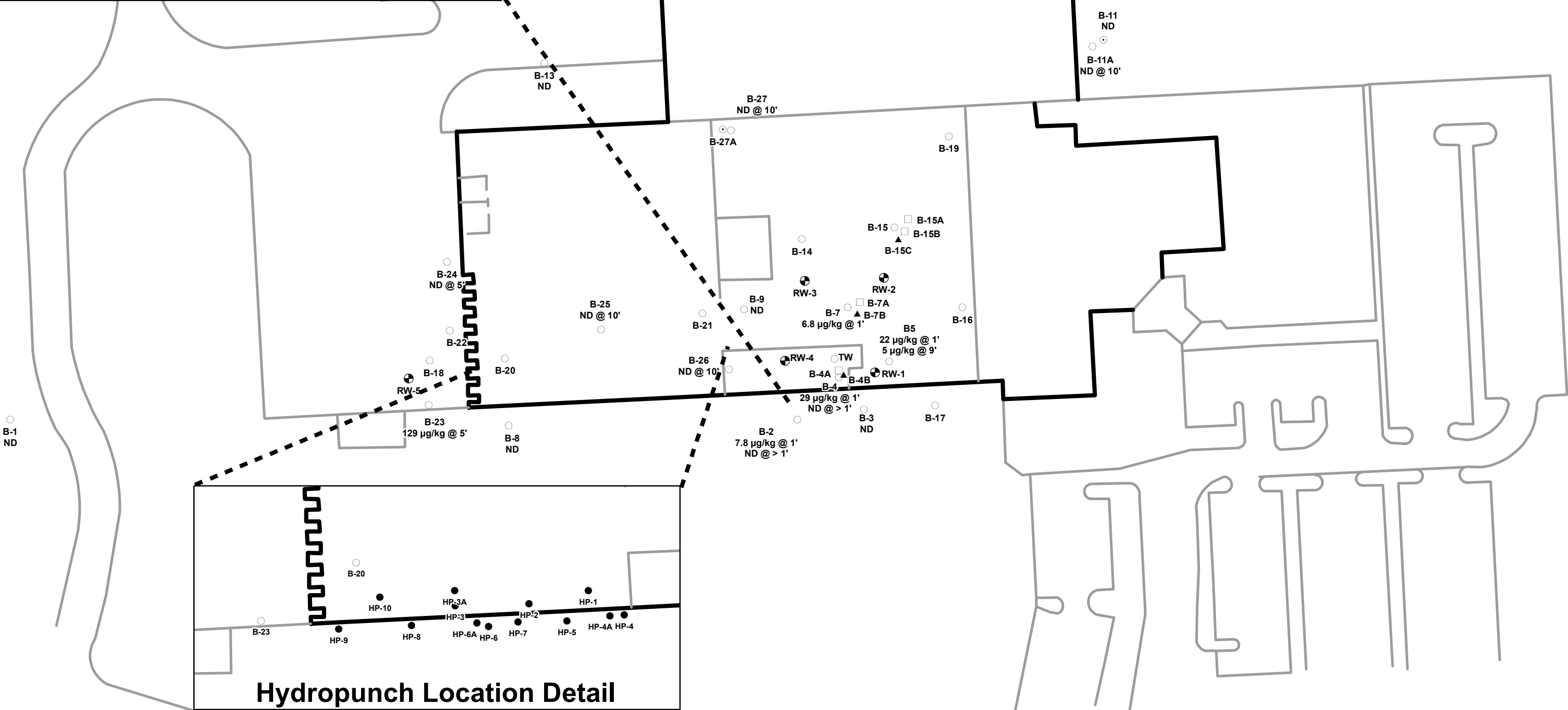
TYPE II MONITORING WELL - SCREENED IN SOIL

TYPE II MONITORING WELL - SCREENED IN WEATHERED ROCK

TYPE III MONITORING WELL - SCREENED IN WEATHERED ROCK

TYPE III MONITORING WELL - SCREENED IN COMPETENT ROCK

RECOVERY WELL - SCREENED IN SOIL



Xerox CRC Facility - Quarterly Progress Report

LAW Project No. 12000-8-0019

July 1998

TABLE 1
SUMMARY OF SOIL AND GROUND-WATER DATA
HYDROPUNCH SAMPLING EVENT
DATE: FEBRUARY 6, 1998

HYDROPUNCH LOCATION	OIL SAMPLE DEPTH (feet)	PID READING (ppm)	SOIL ANALYTICAL RESULTS (µg/kg)		GW ANALYTICAL RESULTS (µg/L)	
			8010 Constituents	Mineral Spirits	PCE	Mineral Spirits
HP-1	0-2 5-7 10-12 15-17	2.6 2.2 1.7 2.7			PCE - 130	<100
HP-2	1-3 5-7 10-12 15-17	2.8 2.9 3.0 2.7			PCE - 2100	<100
HP-3	0-2 5-7 10-12 15-17	0.9 0.5 0.7 0.5			PCE - 4.8	NA
HP-4	0-2 5-7 10-12 15-17	0.5 0.3 0.7 0.5			PCE - 1900	3400
HP-5	0-2 5-7 10-12 15-17	0.6 0.3 0.7 0.5			NA	NA
HP-6	0-2 5-7 10-12 15-17	1 0.5 2.5 2.1				

NOTES:

Soil samples analyzed using EPA Methods 8010 and 8015M.

Ground-water samples analyzed using EPA Methods 8010 and 8015M.

NA - not analyzed due to refusal above the water table

ND - no constituents detected

Prepared by: BRS 6/15/98

Checked by: NAM 6/12/98

Xerox CRC Facility - Quarterly Progress Report

LAW Project No. 12000-8-0019

July 1998

TABLE 2
SUMMARY OF SOIL AND GROUND-WATER DATA
HYDROPUNCH SAMPLING EVENT
DATE: MARCH 12, 1998

HYDROPUNCH LOCATION	OIL SAMPLE DEPTH (feet)	PID READING (ppm)	SOIL ANALYTICAL RESULTS (µg/kg)		GW ANALYTICAL RESULTS (µg/L)	
			8010 Constituents	Mineral Spirits	PCE	Mineral Spirits
HP-3A	0-2 5-7 10-12 15-17	2 3 2.4 2.4			PCE - 53	<100
HP-7	1-3 5-7 10-12 15-17	3.7 12.0 5.5 13.0			PCE - 4200	<100
HP-8	0-2 5-7 10-12 15-17	5.0 1.2 6.2 2.5			PCE - 300	<100
HP-9	0-2 5-7 10-12 15-17	3.0 13.5 1.4 3.4			PCE - 6	<100
HP-10	0-2 5-7 10-12 15-17	7.0 5.3 7.5 2.9			PCE - 20	<100

NOTES:

Soil samples analyzed using EPA Methods 8010 and 8015M.

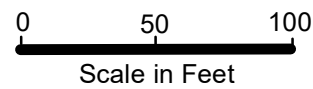
Ground-water samples analyzed using EPA Methods 8010 and 8015M.

ND - no constituents detected

NA - not analyzed

Prepared by: BRS 6/15/98

Checked by: NAM 6/12/98



Xerox Corporation
Fulton Industrial Park
Atlanta, GA

Historic Sampling Locations/Results

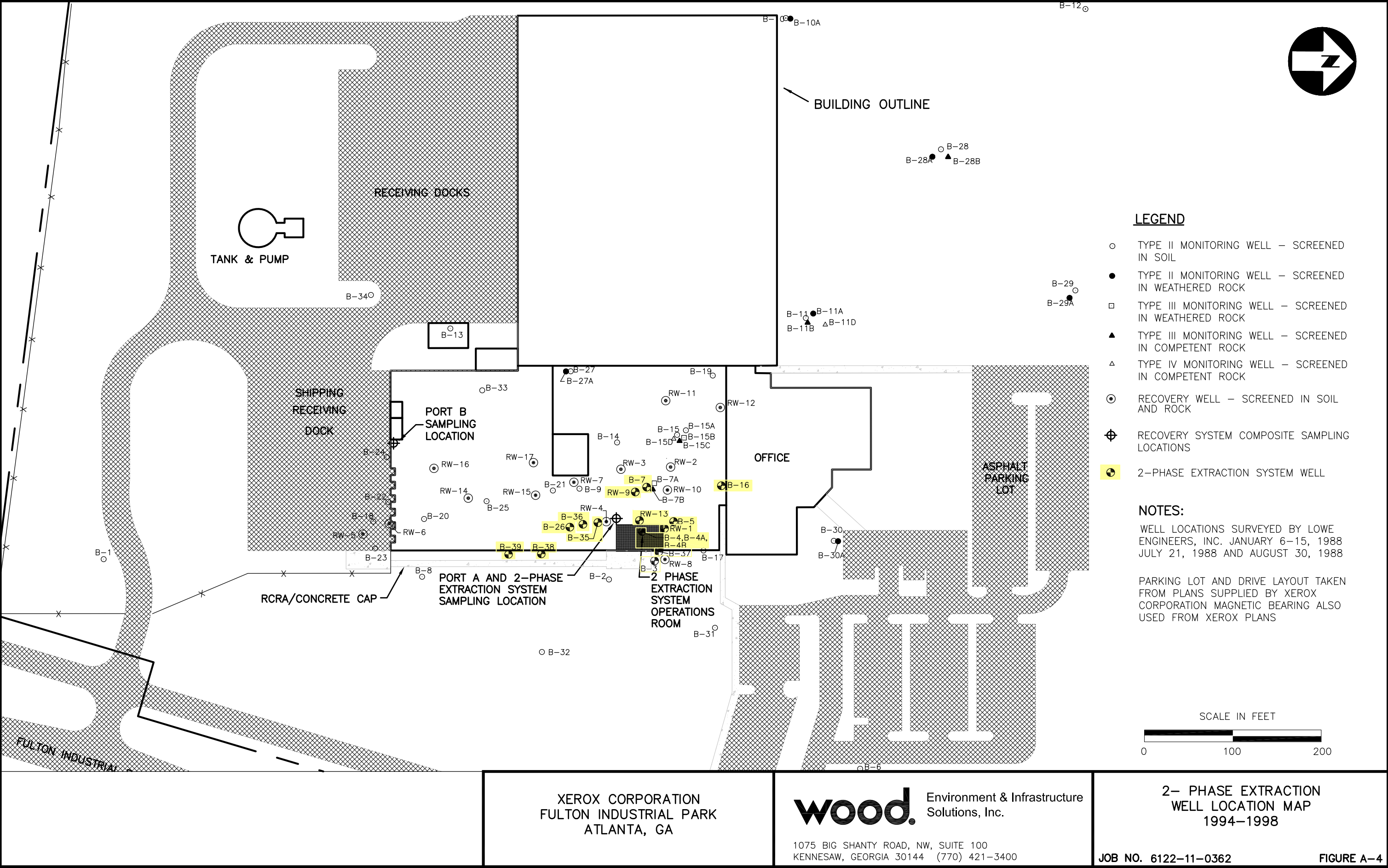
Prepared by/Date:
JQ 4/22/2020

Checked by/Date:
ADA - 4/22/2020

Project Number:
6122110362

wood.

Figure Number:
A-3



ATTACHMENT 2

EDR GEOCHECK PHYSICAL SETTING SOURCE ADDENDUM DATED MAY 11, 2020

FORMER XEROX-ATLANTA CRC HAZARDOUS WASTE PERMIT PART A

GEOCHECK[®] - PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

XEROX
6077 FULTON INDUSTRIAL BOULEVARD
ATLANTA, GA 30336

TARGET PROPERTY COORDINATES

Latitude (North):	33.718591 - 33° 43' 6.93"
Longitude (West):	84.587805 - 84° 35' 16.10"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	723523.4
UTM Y (Meters):	3733374.0
Elevation:	794 ft. above sea level

USGS TOPOGRAPHIC MAP

Target Property Map:	6045585 BEN HILL, GA
Version Date:	2014

EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principle investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

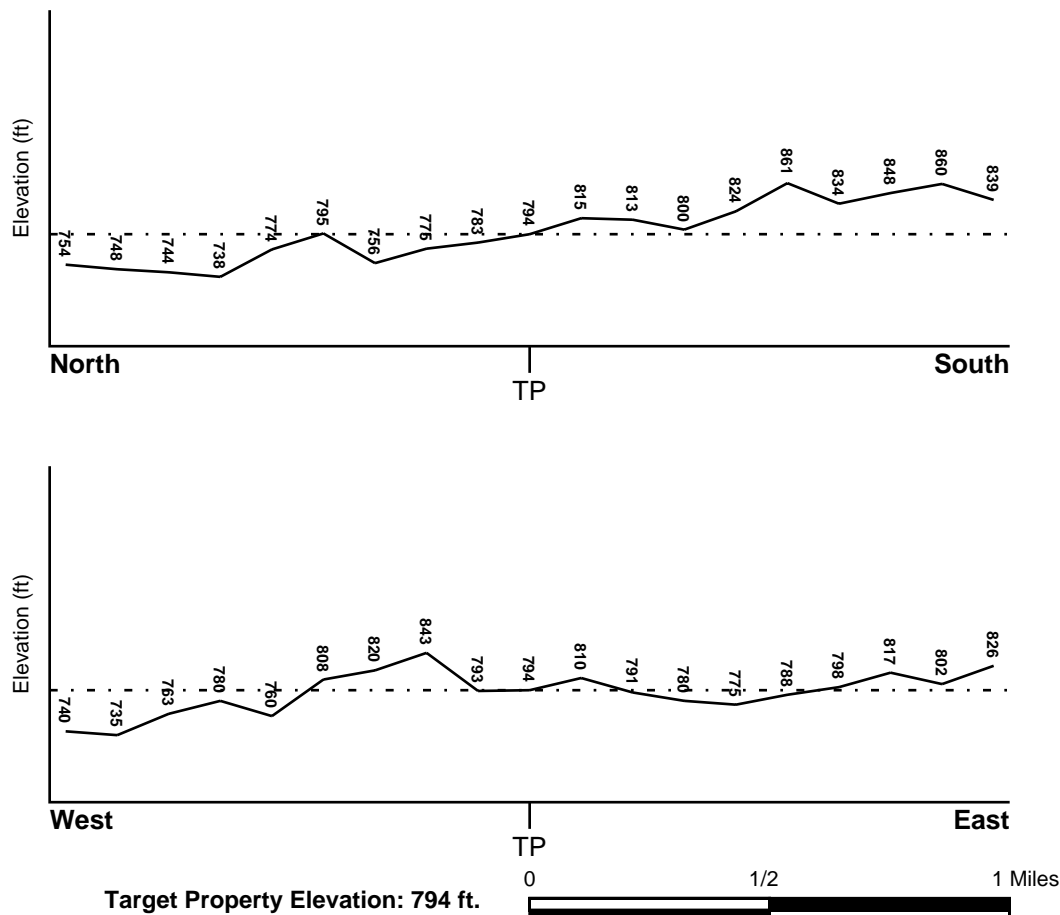
TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

TARGET PROPERTY TOPOGRAPHY

General Topographic Gradient: General NE

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7.5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

<u>Flood Plain Panel at Target Property</u>	<u>FEMA Source Type</u>
13121C0329F	FEMA FIRM Flood data
<u>Additional Panels in search area:</u>	<u>FEMA Source Type</u>
13067C0252H	FEMA FIRM Flood data
13097C0176D	FEMA FIRM Flood data
13097C0177D	FEMA FIRM Flood data
13097C0178D	FEMA FIRM Flood data

NATIONAL WETLAND INVENTORY

<u>NWI Quad at Target Property</u>	<u>NWI Electronic Data Coverage</u>
BEN HILL	YES - refer to the Overview Map and Detail Map

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

<u>MAP ID</u>	<u>LOCATION FROM TP</u>	<u>GENERAL DIRECTION GROUNDWATER FLOW</u>
Not Reported		

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

Era: Paleozoic
System: Devonian
Series: Middle Paleozoic granitic rocks
Code: Pzg2 (*decoded above as Era, System & Series*)

GEOLOGIC AGE IDENTIFICATION

Category: Plutonic and Intrusive Rocks

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps. The following information is based on Soil Conservation Service STATSGO data.

Soil Component Name: CECIL

Soil Surface Texture: sandy clay loam

Hydrologic Group: Class B - Moderate infiltration rates. Deep and moderately deep, moderately well and well drained soils with moderately coarse textures.

Soil Drainage Class: Well drained. Soils have intermediate water holding capacity. Depth to water table is more than 6 feet.

Hydric Status: Soil does not meet the requirements for a hydric soil.

Corrosion Potential - Uncoated Steel: HIGH

Depth to Bedrock Min: > 60 inches

Depth to Bedrock Max: > 60 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Permeability Rate (in/hr)	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	7 inches	sandy clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 2.00 Min: 0.60	Max: 6.50 Min: 4.50
2	7 inches	11 inches	sandy clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 2.00 Min: 0.60	Max: 5.50 Min: 4.50
3	11 inches	50 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Elastic silt.	Max: 2.00 Min: 0.60	Max: 5.50 Min: 4.50
4	50 inches	75 inches	variable	Not reported	Not reported	Max: 0.00 Min: 0.00	Max: 0.00 Min: 0.00

OTHER SOIL TYPES IN AREA

Based on Soil Conservation Service STATSGO data, the following additional subordinant soil types may appear within the general area of target property.

Soil Surface Textures: sandy loam
loam
fine sandy loam

Surficial Soil Types: sandy loam
loam
fine sandy loam

Shallow Soil Types: clay
sandy clay
gravelly - loam

Deeper Soil Types: loamy fine sand
sandy loam
weathered bedrock

LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

WELL SEARCH DISTANCE INFORMATION

<u>DATABASE</u>	<u>SEARCH DISTANCE (miles)</u>
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

FEDERAL USGS WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No Wells Found		

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

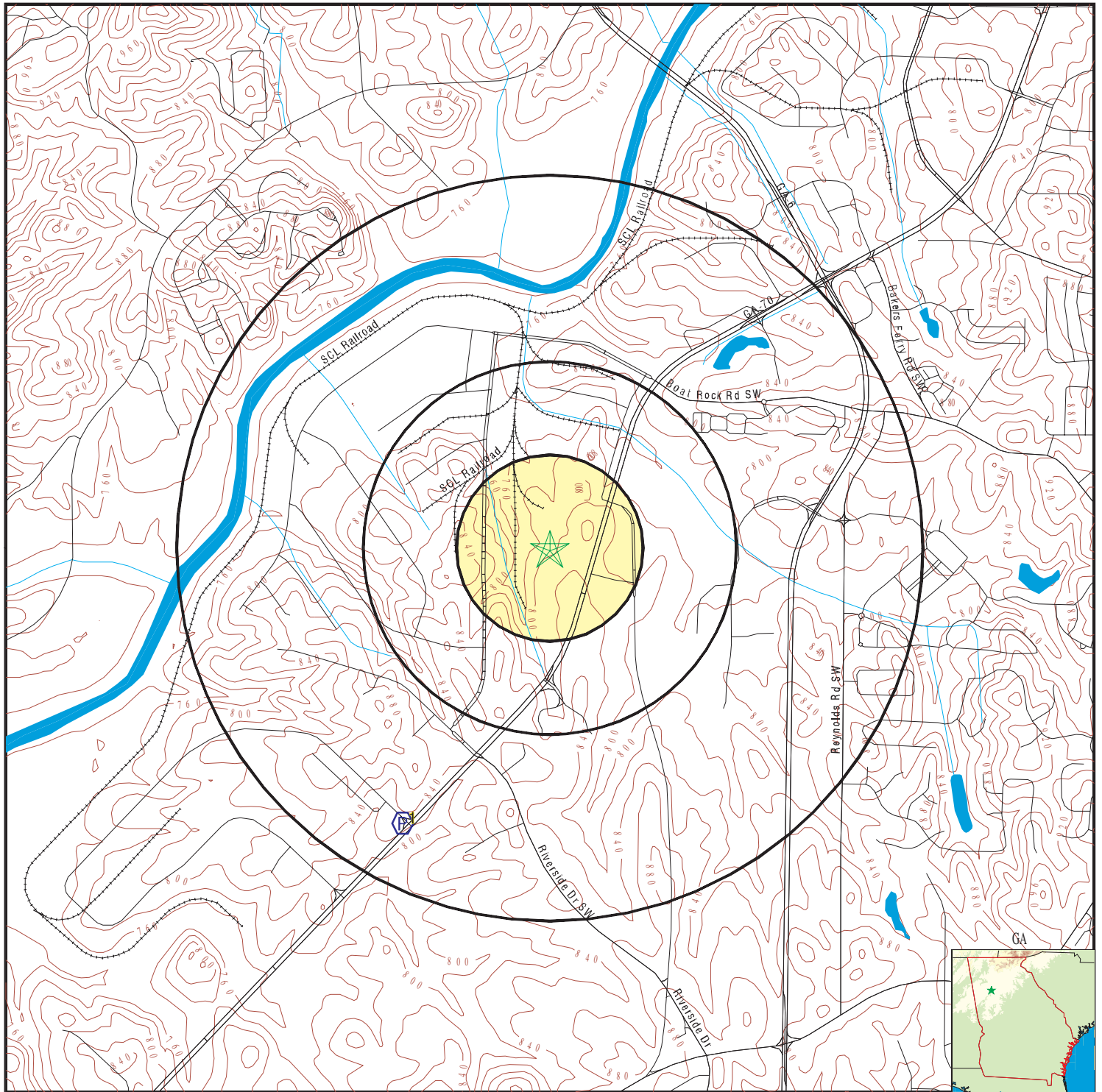
<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
1	GA0970004	1/2 - 1 Mile SSW

Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No Wells Found		

PHYSICAL SETTING SOURCE MAP - 6060868.2s



- County Boundary
- Major Roads
- Contour Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons
- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location
- Wildlife Areas

SITE NAME: Xerox
 ADDRESS: 6077 Fulton Industrial Boulevard
 Atlanta GA 30336
 LAT/LONG: 33.718591 / 84.587805

CLIENT: Wood Environment & Infrastructure Solutions, Inc.
 CONTACT: Nicholas Mcmillan
 INQUIRY #: 6060868.2s
 DATE: May 11, 2020 3:37 pm

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

Database EDR ID Number

1
SSW
1/2 - 1 Mile
Higher

FRDS PWS GA0970004

Epa region:	04	State:	GA
Pwsid:	GA0970004	Pwsname:	ATLANTA VIEW TRAILER PARK
Cityserved:	Not Reported	Stateserved:	GA
Ziperved:	Not Reported	Fipscounty:	13097
Status:	Closed	Retpopsrvd:	43
Pwssvconn:	21	Psource longname:	Groundwater
Pwstype:	CWS	Owner:	Private
Contact:	HENSON, LARRY D	Contactorgname:	Not Reported
Contactphone:	Not Reported	Contactaddress1:	2020 ROCK HOUSE ROAD
Contactaddress2:	Not Reported	Contactcity:	LITHIA SPRINGS
Contactstate:	GA	Contactzip:	30057
Pwsactivitycode:	I		
PWS ID:	GA0970004	PWS name:	ATLANTA VIEW TRAILER PARK
Address:	2020 ROCK HOUSE ROAD	Care of:	ATLANTA VIEW MOBILE HOME PARK
City:	LITHIA SPRINGS	State:	GA
Zip:	30057	Owner:	ATLANTA VIEW TRAILER PARK
Source code:	Ground water	Population:	43
PWS ID:	GA0970004	PWS type:	Not Reported
PWS name:	Not Reported	PWS address:	Not Reported
PWS city:	Not Reported	PWS state:	Not Reported
PWS zip:	Not Reported	PWS ID:	GA0970004
Activity status:	Active	Date system activated:	Not Reported
Date system deactivated:	Not Reported	Retail population:	00000043
System name:	ATLANTA VIEW TRAILER PARK	System address:	ATLANTA VIEW MOBILE HOME PARK
System address:	2020 ROCK HOUSE ROAD	System city:	LITHIA SPRINGS
System state:	GA	System zip:	30057
Population served:	Under 101 Persons	Treatment:	Untreated
Latitude:	334228	Longitude:	0843541
Latitude:	334223	Longitude:	0843532
State:	GA	Latitude degrees:	33
Latitude minutes:	42	Latitude seconds:	23.0000
Longitude degrees:	84	Longitude minutes:	35
Longitude seconds:	32.0000		
State:	GA	Latitude degrees:	33
Latitude minutes:	42	Latitude seconds:	28.0000
Longitude degrees:	84	Longitude minutes:	35
Longitude seconds:	41.0000		

PWS currently has or had major violation(s) or enforcement:Yes

Violation ID:	9400002	Violation source ID:	Not Reported
PWS telephone:	Not Reported	Contaminant:	COLIFORM (TCR)
Violation type:	Max Contaminant Level, Monthly (TCR)		
Violation start date:	110193	Violation end date:	113093
Violation period (months):	001	Violation awareness date:	Not Reported
Major violator:	Not Reported	Maximum contaminant level:	Not Reported
Number of required samples:	Not Reported	Number of samples taken:	Not Reported
Analysis method:	Not Reported	Analysis result:	Not Reported

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

PWS currently has or had major violation(s) or enforcement:Yes

Violation ID:	9200001	Violation source ID:	Not Reported
PWS telephone:	Not Reported	Contaminant:	COLIFORM (TCR)
Violation type:	Max Contaminant Level, Monthly (TCR)		
Violation start date:	090192	Violation end date:	093092
Violation period (months):	001	Violation awareness date:	Not Reported
Major violator:	Not Reported	Maximum contaminant level:	Not Reported
Number of required samples:	Not Reported	Number of samples taken:	Not Reported
Analysis method:	Not Reported	Analysis result:	Not Reported

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

Federal EPA Radon Zone for FULTON County: 1

Note: Zone 1 indoor average level > 4 pCi/L.
: Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
: Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for FULTON COUNTY, GA

Number of sites tested: 50

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	1.370 pCi/L	98%	2%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	3.154 pCi/L	75%	25%	0%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)

Source: United States Geologic Survey

EDR acquired the USGS 7.5' Digital Elevation Model in 2002 and updated it in 2006. The 7.5 minute DEM corresponds to the USGS 1:24,000- and 1:25,000-scale topographic quadrangle maps. The DEM provides elevation data with consistent elevation units and projection.

Current USGS 7.5 Minute Topographic Map

Source: U.S. Geological Survey

HYDROLOGIC INFORMATION

Flood Zone Data: This data was obtained from the Federal Emergency Management Agency (FEMA). It depicts 100-year and 500-year flood zones as defined by FEMA. It includes the National Flood Hazard Layer (NFHL) which incorporates Flood Insurance Rate Map (FIRM) data and Q3 data from FEMA in areas not covered by NFHL.

Source: FEMA

Telephone: 877-336-2627

Date of Government Version: 2003, 2015

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005 and 2010 from the U.S. Fish and Wildlife Service.

State Wetlands Data: Wetlands Inventory

Source: Georgia GIS Clearinghouse

Telephone: 706-542-1581

HYDROGEOLOGIC INFORMATION

AQUIFLOW^R Information System

Source: EDR proprietary database of groundwater flow information

EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit

Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Service (NRCS)

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

SSURGO: Soil Survey Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Service (NRCS)

Telephone: 800-672-5559

SSURGO is the most detailed level of mapping done by the Natural Resources Conservation Service, mapping scales generally range from 1:12,000 to 1:63,360. Field mapping methods using national standards are used to construct the soil maps in the Soil Survey Geographic (SSURGO) database. SSURGO digitizing duplicates the original soil survey maps. This level of mapping is designed for use by landowners, townships and county natural resource planning and management.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

LOCAL / REGIONAL WATER AGENCY RECORDS

FEDERAL WATER WELLS

PWS: Public Water Systems

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: USGS National Water Inventory System (NWIS)

This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater.

STATE RECORDS

Georgia Public Supply Wells

Source: Georgia Department of Community Affairs

Telephone: 404-894-0127

USGS Georgia Water Wells

Source: USGS, Georgia District Office

Telephone: 770-903-9100

OTHER STATE DATABASE INFORMATION

DNR Managed Lands

Source: Department of Natural Resources

Telephone: 706-557-3032

This dataset provides 1:24,000-scale data depicting boundaries of land parcels making up the public lands managed by the Georgia Department of Natural Resources (GDNR). It includes polygon representations of State Parks, State Historic Parks, State Conservation Parks, State Historic Sites, Wildlife Management Areas, Public Fishing Areas, Fish Hatcheries, Natural Areas and other specially-designated areas. The data were collected and located by the Georgia Department of Natural Resources. Boundaries were digitized from survey plats or other information.

RADON

Area Radon Information

Source: USGS

Telephone: 703-356-4020

The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

EPA Radon Zones

Source: EPA

Telephone: 703-356-4020

Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities

Source: Federal Aviation Administration, 800-457-6656

Epicenters: World earthquake epicenters, Richter 5 or greater

Source: Department of Commerce, National Oceanic and Atmospheric Administration

Earthquake Fault Lines: The fault lines displayed on EDR's Topographic map are digitized quaternary faultlines, prepared in 1975 by the United State Geological Survey

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STREET AND ADDRESS INFORMATION

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