



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

November 6, 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: +11 770-421-3400

www.woodplc.com

Subject: **RCRA Part B Permit Renewal Application Revised Section I 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 Section I 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 Section I has been revised as discussed during our conference call of October 8, 2020. Xerox has reviewed and approved this revised Section I 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



SECTION I - CLOSURE PLAN, POST-CLOSURE CARE PLAN AND FINANCIAL REQUIREMENTS

I-1 - Closure Plan

Closure of the underground storage tanks (USTs) and associated piping area was completed in 1984 in accordance with the Closure Plan. The Closure Plan, approved on July 20, 1984, consisted of the following activities:

1. Removal of final inventory of fluids (primarily water and spent solvent) from the 12,000-gallon waste UST and disposal as an F002 hazardous waste. Residual product from the 10,000-gallon fresh solvent USTs had been previously recovered. Tightness testing of the USTs was conducted in August 1982; the tanks tested tight.
2. Removal of the USTs and associated piping and disposal of both as hazardous waste.
3. Sampling of soils from the UST excavation and from beneath the associated piping
4. Site Restoration
5. Sample Evaluation
6. Closure Certification

A survey of the closure area is presented on Figure I-1.

Closure activities were conducted in October 1984, and consisted of the following:

1. The tanks and surrounding soils were removed down to the common "tie-down" concrete slab. Due to the presence of groundwater to a level above the top of the slab (at a depth of approximately 18 feet below ground surface), a groundwater sample (Sample 19) was collected for analysis (rather than soils being collected from adjacent to the base of the slab). The water sample was analyzed and PCE was detected at a concentration of 163 µg/L; TCE at 30 µg/L and 1,1,1-TCA at 35 µg/L were also detected. The concrete "tie-down" pad was left in place and the excavation was backfilled with rock dust from an off-site source and soil from the tank pit excavation.
2. Piping extending from the USTs along the east side of the building to the former parts cleaning area and adjacent soils were excavated to a depth of approximately 4 feet, 1 foot (±) below the piping. The excavated soils were stockpiled. Soil samples (Samples 1 through 17) were collected at approximate 20-foot intervals from the base of the trench excavation and composited. The PCE concentration of the composite sample was 1,401 µg/kg. The pipe trench excavation was backfilled with these excavated soils and with soils from the tank pit excavation.
3. During removal of the piping, evidence of a former leak was detected at the elbow joint where the pipe carrying waste solvent exited from the building to return to the tank area. An area around the pipe joint extending 25 feet along the side of the building, to 15 feet out from the building, and 10 feet deep was excavated. The soils, 140 cubic yards, were manifested for off-site disposal as a hazardous waste. Soil samples P-1 through P-4 were collected from the 4 sides of the excavation at a depth of approximately 6 feet; sample P-5 from the bottom of the excavation, at a depth of approximately 10 feet. PCE concentrations reported were: P-1 (76,000 µg/kg), P-2 (4,300 µg/kg), P-3 (2,400 µg/kg), and P-4 (64 µg/kg). The PCE concentration in the

excavation bottom sample (P-5) was 110,000 µg/kg (see Figure E-8). The excavation was filled with gravel.

4. In 1988, Law Environmental, Inc. constructed a RCRA cap over the former USTs and associated piping area. The report describing the construction of the concrete cover (the RCRA cap) and including an "as built" drawing is dated September 14, 1988. The "as built" drawing is reproduced in this Section as Figure I-2. The *Construction Report-Concrete Slab Installation, Xerox Facility* (1988) is in Appendix I-1.
5. The closure was certified on January 8, 1987 by the independent engineer of record (Camp, Dresser & McKee Inc.). The Closure Plan (approved July 20, 1984) and Closure Certification (January 8, 1987) are in Appendix I-2.
6. In the absence of clean closure, the area encompassing the former USTs and associated piping was closed in accordance with landfill requirements and was designated a Hazardous Waste Management Unit with contaminated groundwater and was issued Hazardous Waste Post-Closure Care Permit No. HW-070(D).

I-2 - Post-Closure Care Plan

A Post-Closure Care Plan is included to describe the on-going monitoring and maintenance that will occur for the Post-Closure Care period. This Post-Closure Care Plan describes the activities that will be performed to manage the closed USTs and associated piping area throughout the Post-Closure Care period in accordance with 40 CFR 264.117 and 118. This Plan describes groundwater monitoring and inspection and maintenance activities. Xerox will maintain a copy of the approved Post-Closure Care Plan and all revisions to the plan on-site until the post-closure report has been submitted and accepted by the Georgia EPD.

I-2.a Inspection Plan

The closed former USTs and associated piping area will be monitored and maintained throughout the Post-Closure Care period. Activities will consist of periodic inspections and required maintenance of the concrete (RCRA) cap and the groundwater monitoring wells. Inspections of the concrete cap and the monitoring wells will be made by trained personnel at least semi-annually. Records of inspection will be kept at Wood's office in Kennesaw. Checklists for the inspections of the concrete cap and wells are provided in Appendix I-3.

I-2.b Groundwater Monitoring Plan

Groundwater monitoring activities scheduled during the Post-Closure Care period will consist of sampling and analysis of appropriate monitoring wells as defined in Section E-8 of this application.

I-2.c Maintenance Plan

Maintenance of the closed former USTs and associated piping area will include the following:

1. Maintenance and Repair of the Cap - the concrete cap will be inspected at least semi-annually. Inspections are to detect any damage to the cap surface (cracks, deteriorated or missing joint sealant, vegetation growth through slab, etc.); erosion, settlement, or ponding of water on or against the slab; burrowing or infestation of ants or other insects; and any other observable adverse condition will be documented. Repairs will be promptly conducted as indicated on the attached inspection form (Appendix I-3).

2. Groundwater Monitoring System- Groundwater monitoring wells will be inspected at least semi-annually and during sampling events to verify that visible portions of the wells are maintained. Well pads will be free of cracks, be in contact with the protective casing, and be stable (have a firm footing with the underlying soil); well casings will be structurally stable with minimal rusting or deterioration and have a tight fitting, lockable cover. The wells will be examined to confirm the measuring point is clearly marked and that the weepholes in the protective covers function to preclude water from ponding between the well casing and the outer protective covers. The inspections should confirm that vegetation is maintained to provide for unimpeded well access and that ants, wasps, spiders or other insects have not established permanent residence in or adjacent to the wells. Each well will be plumbed for the presence of sediment. Adverse conditions will be noted. Repairs will be promptly conducted as indicated on the attached inspection form (Appendix I-3).

I-2.d Land Treatment

This section is not applicable to the Xerox facility.

I-2.e Post-Closure Care for Miscellaneous Units

This section is not applicable to the Xerox facility.

I-2.f Post-Closure Security

The closed RCRA cap and monitoring wells are located in unfenced areas outside of the building. However, facility workers or trespassers should not be subject to injury or exposure to potentially contaminated soil or ground water by their entry into areas where the closed RCRA Cap or the locked monitoring wells are located. Signage is provided to advise persons not to disturb the Cap or the monitoring wells.

I-2.g Post-Closure Contact

Mr. Marcus Lathrop, Xerox's Manager; Assessment and Environmental Operations, is the post-closure contact. Mr. Lathrop's mailing address and telephone number are:

800 Phillips Road, Building 0207-01Z
Webster, NY 14580
Telephone 585-422-9055

I-3 - Notices Required for Disposal Facilities

I-3.a Certification of Closure

A closure certification report for the former USTs and associated piping area was submitted by Camp, Dresser and McKee, Inc. on January 8, 1987. The Closure Plan and the CDM Certification are in Appendix I-2.

I-3.b Survey Plot

A surveyed plat of the former USTs and associated piping area is on file with the local zoning authority and with the Georgia EPD and is provided in Appendix I-4.

I-3.c Notice to Local Land Authority

In accordance with 40 CFR 264.119, Xerox submitted the attached plat (Appendix I-4) as notification to Fulton County indicating the location and dimensions of the former USTs and associated piping area. The plat has been stamped by the Clerk of Superior Court (Fulton County, Georgia), indicating it was filed and recorded..

I-3.d Post-Closure Certification

A post-closure certification in accordance with 40 CFR 264.120 will be submitted following the completion of post-closure activities.

I-3.e Notice in Deed to Property

In accordance with 40 CFR 264.119, the deed to the property on which the former USTs and associated piping area are located has been amended in Fulton County Deed Book with a notation that the land has been used to manage hazardous waste. A surveyed plat of the former USTs and associated piping area is on file with the local zoning authority and the GA EPD (See Appendix I-4).

I-4 - Closure Cost Estimate

The former USTs and associated piping area were closed in 1984 and certified in 1987. Therefore, a Closure Cost Estimate is not applicable.

I-5 - Financial Assurance Mechanism for Closure

The former USTs and associated piping area were closed in 1984. Therefore, a Financial Assurance Mechanism for Closure is not applicable.

I-6 - Post-Closure Cost Estimate

A Post-Closure Cost Estimate for the former USTs and associated piping area has been prepared in accordance with 40 CFR 264.144. The Post-Closure cost estimate for the current year of the application is provided in Appendix I-5. The estimate accounts for the cost of third-party services required to administer, operate, monitor and maintain the Post-Closure Care Plan and its related tasks.

Revisions of the estimate will be made and submitted to the Director within 30 days following permit modification approvals by the Director. The total cost estimate for Post-Closure Care for which Financial Assurance is required is provided in Appendix I-5.

I-7 - Financial Assurance Mechanism

Xerox is providing financial assurance for the site post-closure activities by corporate guarantee (bond rating) in accordance with the requirements of 40 CFR 264.145.

A copy of the current mechanism is provided in Appendix I-5.

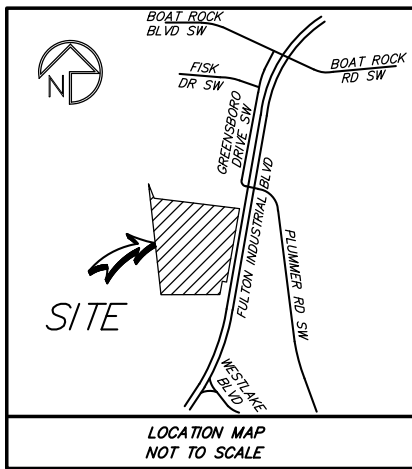
I-8 - Liability Requirements

The former USTs and associated piping area have been closed and do not possess a threat of liability due to sudden accidental occurrences arising from the operation of the facility. Therefore, this section is not applicable.

I-9 - State Financial Mechanism

Xerox will not request state assumption of the liability or the financial responsibility for the post-closure activities. Therefore, this section is not applicable to the Xerox facility.

FIGURES



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.

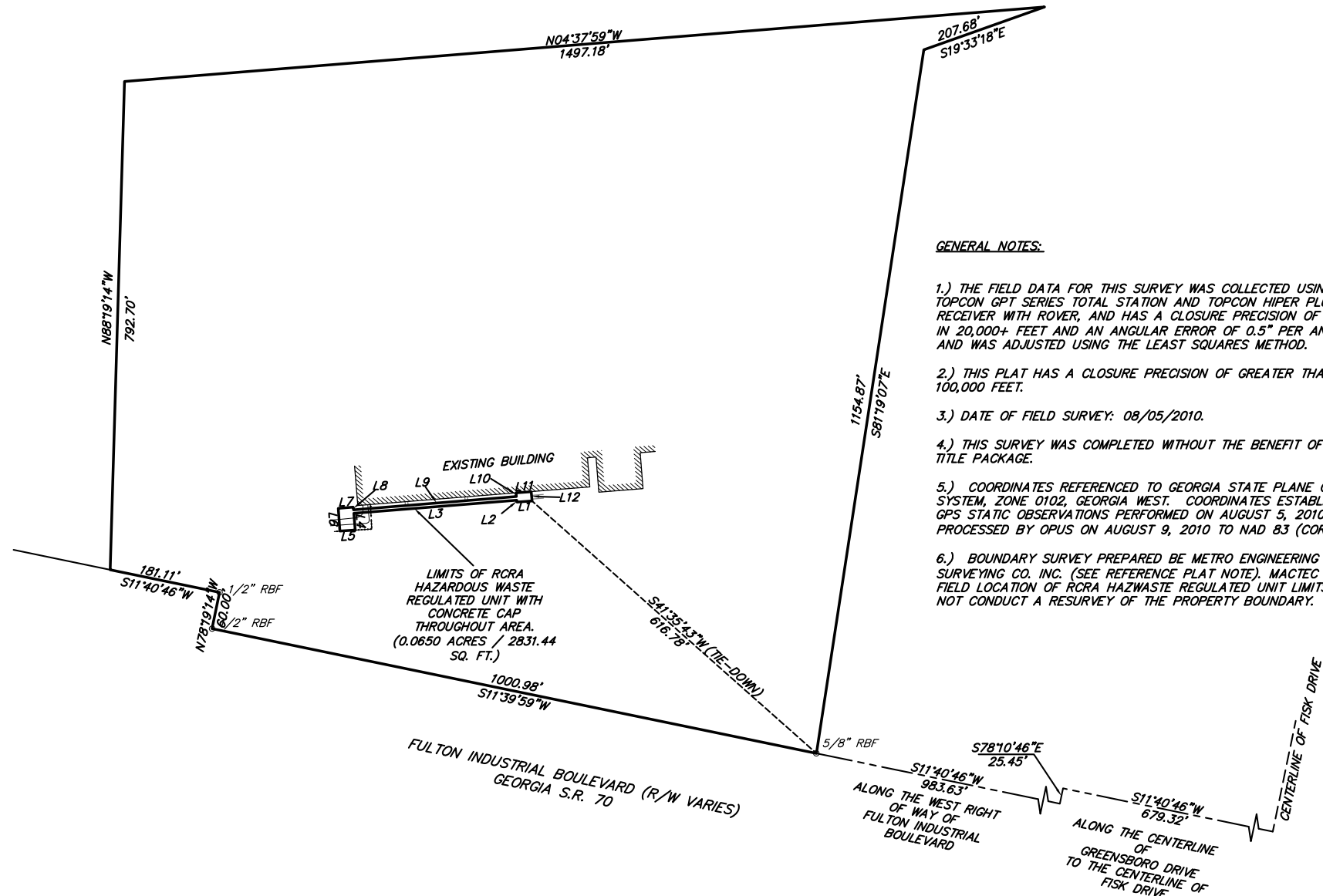
GRID NORTH
GEORGIA STATE PLANE
COORDINATE SYSTEM
(WEST ZONE)

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.



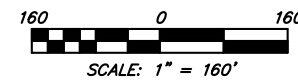
GENERAL NOTES:

- 1.) THE FIELD DATA FOR THIS SURVEY WAS COLLECTED USING A TOPCON GPT SERIES TOTAL STATION AND TOPCON HIPER PLUS GPS RECEIVER WITH ROVER, AND HAS A CLOSURE PRECISION OF ONE FOOT IN 20,000+ FEET AND AN ANGULAR ERROR OF 0.5" PER ANGLE POINT, AND WAS ADJUSTED USING THE LEAST SQUARES METHOD.
- 2.) THIS PLAT HAS A CLOSURE PRECISION OF GREATER THAN 1 FOOT IN 100,000 FEET.
- 3.) DATE OF FIELD SURVEY: 08/05/2010.
- 4.) THIS SURVEY WAS COMPLETED WITHOUT THE BENEFIT OF A CURRENT TITLE PACKAGE.
- 5.) COORDINATES REFERENCED TO GEORGIA STATE PLANE COORDINATE SYSTEM, ZONE 0102, GEORGIA WEST. COORDINATES ESTABLISHED BY GPS STATIC OBSERVATIONS PERFORMED ON AUGUST 5, 2010 AND PROCESSED BY OPUS ON AUGUST 9, 2010 TO NAD 83 (CORS 96).
- 6.) BOUNDARY SURVEY PREPARED BY METRO ENGINEERING AND SURVEYING CO. INC. (SEE REFERENCE PLAT NOTE). MACTEC PROVIDED FIELD LOCATION OF RCRA HAZWASTE REGULATED UNIT LIMITS AND DID NOT CONDUCT A RESURVEY OF THE PROPERTY BOUNDARY.

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.

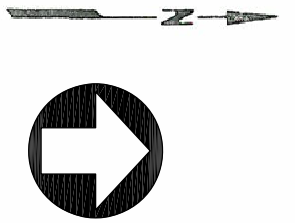


SITE LOCATED IN LAND LOT 133
14th DISTRICT FF, FULTON COUNTY, GEORGIA.

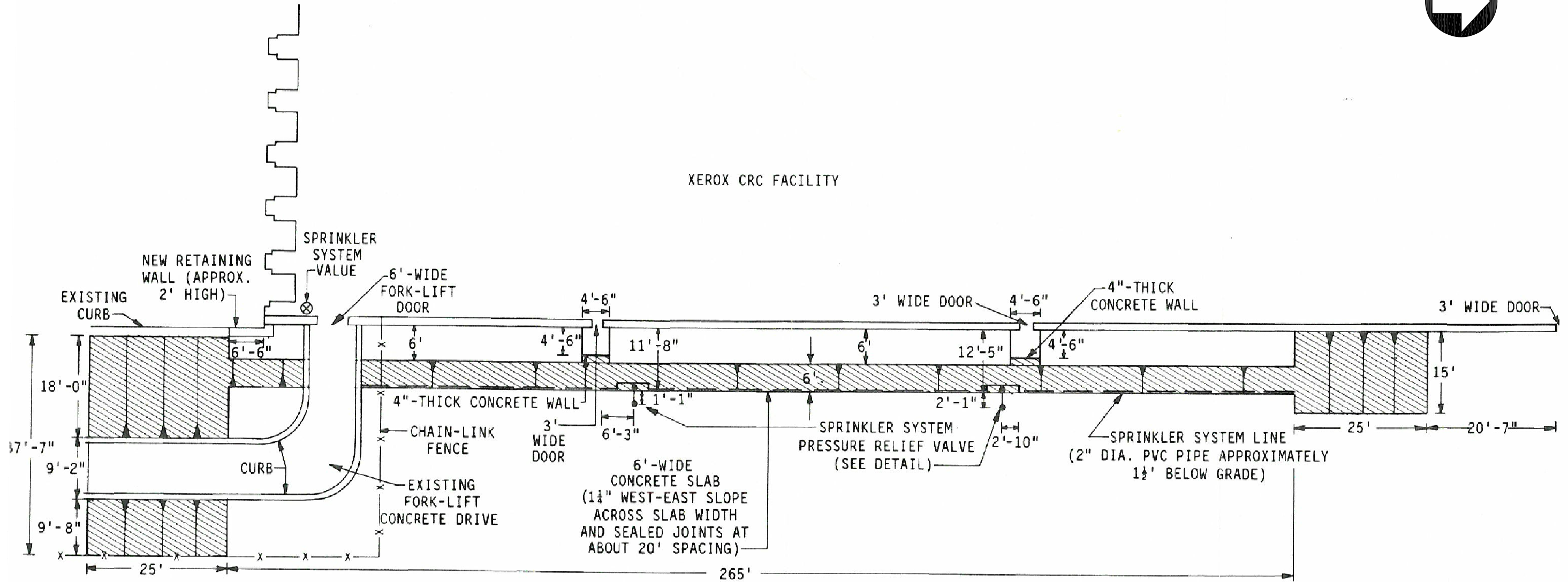
© COPYRIGHT 2020 MACTEC

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			CONTRACT 6122110362	DWG. NO. I-1
REV					CHECKED M E BARTENFELD	ENVIRONMENT & INFRASTRUCTURE SOLUTIONS, INC. 1075 BIG SHANTY ROAD, NW, SUITE 100 KENNESAW, GEORGIA 30144 (770) 421-3400			
REV					IN CHARGE F D SHIVER				
REV	DATE	BY	SUB	APP	DATE	08-09-10			


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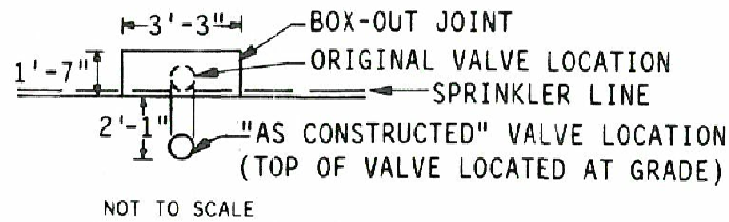
XEROX CRC FACILITY



LEGEND

 SHADED AREA INDICATES LOCATION OF 4" THICK CONCRETE (3000 PSI) SLAB WITH STEEL WIRE MESH AND UNDERLAIN WITH POLYETHYLENE SHEETING.

 INDICATES DOWNWARD SLOPE (IN THE DIRECTION OF THE ARROWS) OF CONCRETE SLAB SURFACE.



NOTE: THE PURPOSE OF THIS NOT-TO-SCALE FIGURE IS TO ILLUSTRATE. FOR ACCURATE SURVEY INFORMATION, REFER TO THE DRAWING PREPARED BY LOWE ENGINEERS, INC.

SOURCE: CONSTRUCTION REPORT- CONCRETE SLAB INSTALLATION, XEROX FACILITY (LAW ENVIRONMENTAL INC., SEPTEMBER 14, 1988.)

XEROX CORPORATION
FULTON INDUSTRIAL PARK
ATLANTA, GEORGIA

wood. Environment & Infrastructure
Solutions, Inc.

1075 BIG SHANTY ROAD, NW, SUITE 100
KENNESAW, GEORGIA 30144 (770) 421-3400

AS BUILT CONCRETE COVER (RCRA CAP)

JOB NO. 6122110362

FIGURE I-2

PREPARED BY/DATE JQ 7/30/2020
CHECKED BY/DATE ADA 7/30/2020

APPENDIX I-1

CONSTRUCTION REPORT- CONCRETE SLAB INSTALLATION, XEROX FACILITY



LAW ENVIRONMENTAL, INC.

112 TOWNPARK DRIVE
KENNESAW, GEORGIA 30144-5599
404-421-3400

September 14, 1988

Xerox Corporation
800 Phillips Road
W-304-135
Webster, New York 14580

Attention: Mr. Elliott Duffney
Senior Environmental Engineer

Subject: Construction Report
Concrete Slab Installation
Xerox Facility
6700 Fulton Industrial Blvd.
Atlanta, Georgia
Law Environmental Job No. 55-433309

Gentlemen:

This report is to provide "as-built" construction information on the concrete slab which Law Environmental, Inc. has installed at the Xerox CRC facility on Fulton Industrial Boulevard in Atlanta, Georgia. The specified slab thickness of 4 inches and location of the slab described as a "cap" over a hazardous waste management unit (an area where solvent tanks and associated piping previously existed), were indicated to us on a reduced drawing titled "Removal Plan, Sheet 2 of 2." The scope of work was described in our December 14, 1987 proposal (No. LE-7023.80).



Site Conditions Prior to Slab Installation

The slab construction area is located along the eastern side of the existing Xerox CRC facility, which is presently functioning as a warehouse. Below-ground solvent tanks were originally located at the southeast corner of the facility. Buried piping extended northward, exterior of and parallel to the building for a distance of almost 300 feet, where the piping turned westward and entered the building. The tanks and piping had been removed and the excavations backfilled by others prior to slab construction.

Prior to slab construction, the slab area was relatively level and grass-covered. The ground surface generally sloped gently to the east toward a drainage swale which drains surface water southward to a storm-sewer catch basin southeast of the building.

At the southeast corner of the building, an approximately nine-foot-wide concrete drive extends east from a six-foot-wide door and then turns 90 degrees to the south followed by another 90 degree turn into the truck loading area. The chain link fence which encloses the truck loading area extends east from the building, and then turns 90 degrees to the south, enclosing the concrete driveway.

Ground surface elevation between the concrete driveway and truck parking area was 3 to 4 feet higher than the truck parking area surface. A low railroad tie retaining wall (two timber



ties high) extended along the east side of the truck loading dock area.

Concrete Slab

The extent of the concrete slab is shown on Figure 1 and on the drawing prepared by Lowe Engineers, Inc. which is enclosed in the pocket at the back of this report. The portion of the slab which overlies the area where the tanks were buried was constructed in two sections. One 18 by 25 foot section is located west of the existing concrete drive and the other, a 9.7 by 25 foot section, is on the east side of the drive. The eastern section of slab over the tank area slopes downward from the existing drive to the east. The western section of slab over the tank area slopes from the existing drive downward to the west to the top of the loading dock slab curb. Between the northwest corner of this western section and the southeast building corner, the railroad tie retaining wall was replaced with a concrete retaining wall approximately 8 feet long with a maximum height of about two feet.

Where the 6-foot wide portion of the new slab crosses the existing concrete driveway, concrete was poured to abut the concrete of the existing drive, using sealed joints between new and existing concrete. The existing chain link fence was temporarily removed during slab construction and then reinstalled. The 6-foot wide portion of slab has a total length



of approximately 265 feet.

There are two doorways in the east building wall adjacent to the 6-foot wide slab. Each doorway has a small exterior concrete pad with a short (about 3 feet high) concrete wall at the east edge of each pad. New slab concrete was poured to fill in the area between the 6-foot wide slab and the existing short walls. Each fill-in section has dimensions of about 1.5 by 4.5 feet.

The 6-foot wide section of slab was constructed to generally conform to existing ground surface elevation and to slope to the east. The completed slab was measured to have a fall from west to east ranging from 1/4 to 1-1/3 inches.

During excavation for the 6-foot wide slab, two pressure relief valves for an existing sprinkler system were encountered. A 2-inch diameter PVC sprinkler system line was found extending in a south-north direction approximately 12 feet from the building or generally along the east side of the 6-foot wide slab. At the relief valve locations, the sprinkler line is 11.7 and 12.4 feet from the building at the south and north valves, respectively. During the excavation, the PVC piping from the relief valves to the sprinkler line was damaged. The damaged piping was replaced and the south and north relief valves were relocated (for future access) east of the slab at distances of 1.1 and 2.1 feet, respectively.

In the new slab, the areas where the relief valves connected to the sprinkler line were boxed out of the initial



pour. These boxed out areas were poured separately and the joints were sealed with epoxy.

Along the length of the 6-foot wide slab, hand-tooled joints were constructed on approximately 20 foot centers and sealed with epoxy.

The northernmost section of concrete slab, 15 x 25 feet in plan dimension, slopes eastward from the building.

After excavation to the underslab level for the entire slab, the exposed soil surface was compacted with a manually-guided vibratory compactor. Visqueen (polyethylene sheeting) was placed over the subgrade as a moisture barrier. Reinforcing wire mesh was placed and 3,000 psi concrete was poured to complete the 4-inch thick slab. The surface of the slab was given a broom finish.

The soil excavated in reaching underslab level was placed between the 6-foot wide concrete slab and the existing building to promote drainage away from the building and the slab area. This fill was hand graded with rakes and watered.

Site Survey

The "as-built" concrete slab is shown on Figure 1, which is not a scale drawing and is only for use as an illustration. The surveyed slab location and elevations are presented on the drawing enclosed in the pocket at the back of this report. The drawing is to scale and was prepared by a licensed surveyor, Lowe Engineers, Inc. under subcontract to Law Environmental.

Mr. Duffney
Page 6
September 14, 1988



Acknowledgement

We appreciate the opportunity to perform this work for Xerox. If there are any questions concerning this report, please contact us.

Sincerely,

LAW ENVIRONMENTAL, INC.

Joseph A. Carris

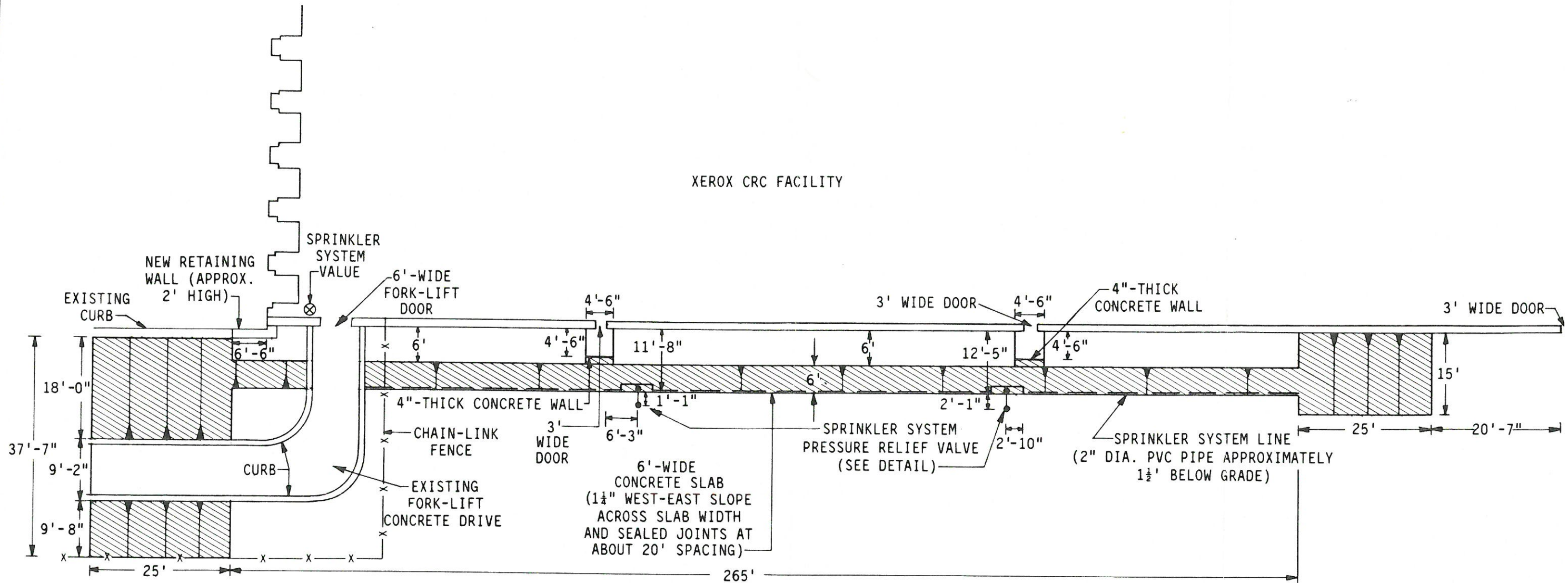
Joseph A. Carris, P.E.
Senior Engineer

L. David Wheelless

L. David Wheelless, P.E.
Principal Engineer




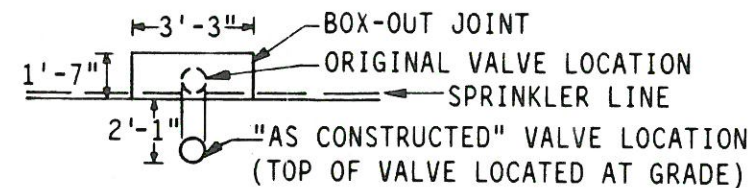
XEROX CRC FACILITY



LEGEND

 SHADED AREA INDICATES LOCATION OF 4" THICK CONCRETE (3000 PSI) SLAB WITH STEEL WIRE MESH AND UNDERLAIN WITH POLYETHYLENE SHEETING.

 INDICATES DOWNWARD SLOPE (IN THE DIRECTION OF THE ARROWS) OF CONCRETE SLAB SURFACE.



PRESSURE RELIEF VALVE DETAIL

SCALE NOT TO SCALE

NOTE: THE PURPOSE OF THIS NOT-TO-SCALE FIGURE IS TO ILLUSTRATE. FOR ACCURATE SURVEY INFORMATION, REFER TO THE DRAWING PREPARED BY LOWE ENGINEERS, INC.

XEROX FACILITY
 6700 FULTON INDUSTRIAL BOULEVARD
 ATLANTA, GEORGIA



LAW ENVIRONMENTAL INC.

"AS BUILT" CONCRETE SLAB

APPENDIX I-2

CLOSURE PLAN AND CAMP, DRESSER AND MCKEE, INC. CERTIFICATION

CT

CLOSURE
PLAN

April 10, 1984

EROX

Jennifer R. Kaduck
Unit Coordinator
Industrial & Hazardous Waste Management Program
Georgia Environmental Protection Division
270 Washington Street, S.W.
Atlanta, Georgia 30334

Re: Closure of Xerox Atlanta
EPA ID# GAD010103232

Dear Ms. Kaduck:

In response to your letter, we are enclosing a modified closure plan for our Atlanta facility. This plan now addresses the removal of both the 12,000 gallon waste storage tank and the 10,000 gallon fresh solvent tank. The generating equipment that supplied the waste tank (which included the supply pump and spray guns) was removed before the building was closed. This equipment was shipped to another one of our refurbishing facilities for reuse.

Listed below are responses to the information requested by Ms. Pierce:

- (a) Both tanks are made out of steel, and the piping material is black iron.
- (b) MEK was used at the plant prior to 1980 as a solvent for cleaning paint spray equipment. In 1980, Xerox switched from using solvent based paint to water based paint. As a result of this change, MEK was no longer needed for cleaning and its use was discontinued.
- (c) The 10,000 gallon tank was always used for storage of fresh chlorinated solvent blends. These blends contained the following constituents:

methylene chloride
1,1,1 - trichloroethane
trichloroethylene
perchloroethylene
aliphatic hydrocarbons (mineral spirits)

Periodically, the percentage of these constituents were changed in the blend but the type of constituents remained the same.

The 12,000 gallon tank was always used as storage for waste solvent. The waste stream consisted of water (80 - 90%), solvent (10 - 20%) and solids (toner, dirt, etc.).

April 10, 1984

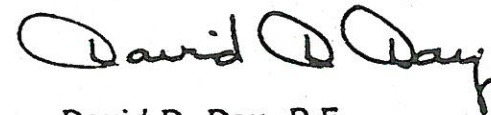
XEROX

- (d) Both tanks were pressure tested in August, 1982, and tested tight. Attached are the results of this testing. The tanks have not been used since the date that they were tested.

We did not address your questions regarding the cost estimate and financial assurance requirements because we agree with your conclusion that both items will soon be moot. We plan to implement the closure plan in July or August, 1984.

If you need further information, don't hesitate to contact me at 716-422-3467.

Very truly yours,



David D. Day, P.E.
Environmental Engineer

DDD:to

Attachment

c: M. Pierce - Georgia EPD

Disc: EE06:2

133

XEROX CORPORATION
ATLANTA REFURBISHING CENTER
CLOSURE PLAN

This closure plan is established for the Xerox Atlanta Refurbishing Center located at 6077 Fulton Industrial Blvd., Atlanta, Georgia, 30336. The facility's EPA Identification Number is GAD010103232. The objective of this plan is to outline the procedure to be followed when closing the hazardous waste facility so that any threats to human health or the environment are minimized or eliminated in compliance with 40 CFR 265.112 of the Federal Hazardous Waste Regulations.

It is expected that closure of this facility shall occur in 1984. Partial closure is not contemplated. The hazardous waste activity covered by this plan is fresh solvent storage and waste solvent storage in closed underground tanks. No other hazardous waste treatment, storage, or disposal activities are performed at the facility. Closure shall occur when the storage tanks are no longer required either due to manufacturing process changes or cessation of operations at the facility.

The fresh solvent tank has a capacity of 10,000 gallons and the waste storage tank has a rated capacity of 12,000 gallons. The maximum anticipated quantity of solvent in storage at any given time at the facility is 10,000 gallons in the fresh tank and 12,000 gallons in the waste tank.

This plan shall be submitted to the appropriate regulatory authority at least 180 days prior to the anticipated date of implementation of this plan. If closure is required for any reason prior to the end of the facility's intended operating life, this plan shall also be valid for such action.

The exact procedure to be followed for closure and a timetable for these activities is as follows:

1) Submission of Plan

It shall be the responsibility of the Xerox NAMD Environmental Engineering area to submit this plan to the appropriate Federal and/or State agencies as required and to prepare and submit any required modifications or additions to this plan.

The person responsible for preparation of this plan and overseeing the implementation of the plan is:

David D. Day, P.E.
Environmental Engineer
Xerox Corporation
Xerox Square - W304
Rochester, New York 14644
(716) 422-3467

All questions and other correspondence regarding this plan should be directed to him at the above address.

2) Removal of Final Inventory of Waste

All wastes shall be removed from both the fresh solvent tank and the waste solvent tank as soon as possible after their generation. This involves pumping as much liquid as is physically possible from the storage tanks using a vacuum truck. These wastes shall be shipped off-site for disposal at a permitted disposal site. A licensed waste hauler shall transport the waste and the proper manifests shall be used for all shipments.

(Note, we are presently making plans to dispose of the final inventory of waste at the Rollins deep-well injection site in Baton Rouge, La.)

3) Negotiate Contracts

Upon receipt of approval of this closure plan, Xerox shall negotiate and enter into contracts with qualified firms to implement the activities outlined in this closure plan. It is anticipated that this shall be completed within forty days of receipt of the approval of the closure plan or receipt of the final volume of waste, whichever is later.

4) Dismantling of Tank

As soon as possible after negotiation of contracts, actual removal of the storage tanks shall begin. All liquid shall be removed from the piping, to the best of the contractor's ability, and disposed of as a hazardous waste. (Note, the piping should not contain any solvent since they are pitched back toward the tanks.) The tank shall be removed in compliance with the National Fire Protection Association's Flammable and Combustion Liquids Code NFPA 30 Appendix C. This code shall be utilized even though the waste is not flammable, combustible or ignitable.

The tank and the piping will not be decontaminated but, instead, will be disposed of as hazardous waste. Also, soil contaminated by any spillage that occurs during the dismantling process will be disposed of as a hazardous waste. The piping, and any contaminated soil, will be deposited inside the tanks to fill the void space. The tanks will then be shipped on a flat bed truck to a permitted hazardous waste disposal site for burial in a secure landfill. A licensed waste hauler shall transport the tanks and the proper manifests shall be used for all shipments.

5) Soil Sampling

Soil sampling will be conducted around the tank storage area and beneath the piping to insure that solvent did not spill or leak during the operation of the facility.

C-35

The two underground tanks are strapped to the same rectangular shaped concrete pad. The tanks were installed that way so that they would never "float" to the surface. Any leakage or spillage would have migrated down the sides of the tank, onto the top of the pad, and eventually off the sides of the pad. Therefore, soil contamination problems can be identified simply by sampling on each side of the pad. After the tanks have been removed and the pad has been uncovered, a total of four composite soil samples will be collected (one sample adjacent to each side of the pad and located approximately one foot from the pad). Each sample will be obtained using a hand auger advanced to a depth of one foot below the top elevation of the pad.

After the supply and waste piping is removed, soil samples will be collected from the pipe trench. Each sample will be obtained using a hand auger advanced to a depth of one foot below the pipe elevation. Samples will be collected on twenty foot intervals, so approximately ten samples will be collected. A composite of these samples will be obtained and analyzed. The remaining portion of the ten samples will be archived for a period of 60 days.

All soil samples will be placed in precleaned, teflon-lined screw cap, glass jars and sent to a laboratory for analysis. We estimate it will cost approximately \$2,000 to perform the sampling and analytical work.

6) Site Restoration

After the soil samples have been collected, the excavated area will be restored to its original condition. The contractor will grade and seed the area, and be responsible for insuring that an erosion proof vegetation cover is established.

It is estimated that tank removal and site restoration will take no longer than thirty days.

7) Sample Evaluation

Leachate from each soil sample will be prepared in basic accordance with EP Toxicity Test Procedures. The resulting leachate will be analyzed for Volatile Halogenated Organics (601 Series). The 601 series will detect any and all of the chlorinated hydrocarbons present in the solvent blend(s) used during the operation of the system; however, we do not anticipate that contaminated soil will be found.

It will take 2-4 weeks to receive the results of the analyses. The results will be submitted to the Georgia Environmental Protection Division (GEPD) for their review. If a contamination problem does exist, Xerox will submit a proposal to the GEPD (for approval) outlining the details of further action that will be taken toward resolving the problem.

←3

8) Certifying Closure

Completion of closure shall be certified to the appropriate Federal and/or State control agencies by an independent licensed professional engineer. This certification shall be performed by:

Camp, Dresser & McKee, Inc.
1945 The Exchange, N.W. - Suite 290
Atlanta, Georgia 30339
(404) 952-8643

Certification shall be submitted within thirty days following completion of closure at the facility.

Attachments

- o NFPA 30 - Flammable and Combustible Liquids Code Appendix C
- o Blueprints of Hazardous Waste Storage Tank
- o Time Chart of Closure Activities

Disc: EE06:2

XEROX

May 18, 1984

Jennifer R. Kaduck
Unit Coordinator
Industrial & Hazardous Waste Management Program
Department of Natural Resources
270 Washington Street, S.W.
Atlanta, Georgia 30334

Re: Closure of Xerox Atlanta
EPA ID #GAD010103232

Dear Ms. Kaduck:

This is in response to your letter dated April 23, 1984, which outlined your comments on our modified closure plan. This letter will serve as an addendum to the modified closure plan. Each item is addressed in the same order as outlined in your letter.

1. All tank connections are located on the top of the tanks. When the tanks are uncovered, soil samples will be collected around each tank connection. A composite of these samples will be obtained for each tank and analyzed for the parameters identified in the "Sample Evaluation" section.
2. The pressure testing report indicates that it is approximately ten feet from grade to the bottom of the tanks. This means that the top of the tanks are only two foot below grade. We feel that these field measurements are accurate.

Also, the report indicates that the groundwater table is only 3½ feet below grade. If this situation is encountered when the tanks are removed, we will sample the groundwater rather than the soils. The groundwater samples will be analyzed for chlorinated solvents (601 series), and the results will give a true indication if solvent spillage occurred during the operation of the facility.

We estimate that the solvent piping is buried approximately two feet underground and is located above the groundwater table. Therefore, we still plan to sample the soils underlying the pipe.

May 18, 1984

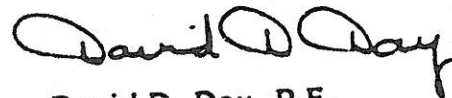
E-35

OX

3. Soil samples obtained from underneath the solvent piping will be collected at each pipe joint. The pipe probably was installed in twenty-foot sections so this means that the samples will be collected at twenty-foot intervals. Samples will also be collected any place where it appears that leakage occurred.
4. Test method 8240 will be used for extracting any volatile organics from the soil samples, instead of the modified EP Toxicity Test procedures identified in the closure plan. The sample will then be analyzed for Volatile Halogenated Organics (601 Series). Note in conducting the 601 Series, the concentration of each chlorinated solvent is identified and reported.
5. A background soil and/or water sample will be collected. See attached drawing for the approximate location where the background sample will be obtained.

Please let us know when the public notice procedures will be implemented. If you need further information, don't hesitate to call me at (716) 422-3467.

Very truly yours,



David D. Day, P.E.
Environmental Engineer

DDD/bb

Attachment

cc M. Pierce - Georgia EPD



JOE D. TANNER
Commissioner

J. LEONARD LEDBETTER
Division Director

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

July 20, 1984

Mr. David D. Day, P.E.
Environmental Engineer
Xerox Corporation
Xerox Square
Rochester, New York 14644

RE: Xerox CRC Plant
Atlanta, Georgia

Dear Mr. Day:

On July 11, 1984 the time period for public comment on the referenced facility's proposed closure plan expired. We did not receive any comments or inquiries regarding your proposal. Therefore, please proceed with closure pursuant to your plan. Please inform us of the date soil samples will be taken so we can perform a site inspection at that time. After closure has been completed, you must submit the certification of closure that is required by §265.115 of Chapter 391-3-11-.10.

We appreciate your cooperation in this matter. If you have any questions, please contact Martha Pierce at 404/656-7802.

Sincerely,

John D. Taylor, Jr.
Chief
Land Protection Branch

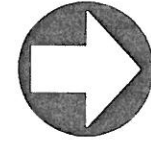
JDT:mpb:16

File: Xerox Corporation (R)

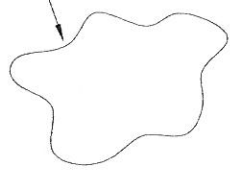
RECEIVED

JUL 24 1984

ENVIRONMENTAL PROTECTION DIVISION



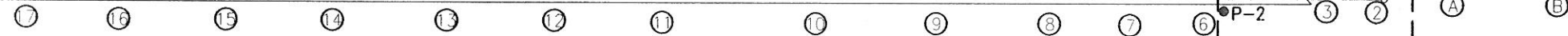
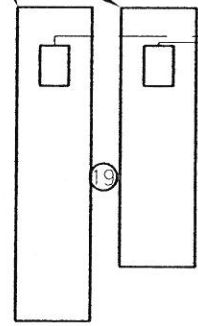
STOCKPILE OF SOIL FROM TANK EXCAVATION



BUILDING

4" STEEL DRAIN AND 2" G.S.P. SUPPLY PIPE

SOLVENT TANKS



APPROXIMATE LIMITS OF PIT EXCAVATION FOR CONTAMINATED SOIL (LATER COVERED AS PART OF RCRA CAP)

LEGEND

- ① SAMPLE LOCATION
- P-1 PIT SAMPLE

SOURCE: DRAWING CREATED FROM SCANNED XEROX DRAWINGS DATED JULY 19, 1984 AND NOVEMBER 16, 1984.

APPROXIMATE SCALE IN FEET



XEROX CORPORATION
FULTON INDUSTRIAL PARK
ATLANTA, GEORGIA

MACTEC
 MACTEC Engineering and Consulting, Inc.
 3200 TOWN POINT DRIVE, SUITE 100
 KENNESAW, GEORGIA 30144 (770) 421-3400

SOIL SAMPLING LOCATION-
CLOSURE PLAN

JOB NO. 12000-08-0019

FIGURE I-1

PREPARED BY/DATE
CHECKED BY/DATE

Xerox, Atlanta (K)
CDM

environmental engineers, scientists,
planners, & management consultants

January 8, 1987

Department of Natural Resources
Environmental Protection Division
270 Washington Street, S.W.
Atlanta, Georgia 30334

Attention: Ms. Martha Pierce

Subject: Certification of Closure
Xerox Atlanta Facility
EPA ID #GAD010103232

Dear Ms. Pierce:

Camp Dresser & McKee Inc. acting as the independent engineer of record pursuant to 40 CER 264.115 certifies that the construction related activities outlined in the approved closure plan for the Xerox Corporation facility located at 6077 Fulton Industrial Boulevard, Atlanta, Georgia 30336, ID #GAD010103232 were carried out.

Although groundwater contamination was found on the site, the closure plan addresses only the physical removal of the two underground tanks and various piping.

If you have any questions, please feel free to contact me at any time.

Sincerely yours,

CAMP DRESSER & MCKEE INC.



David A. Hamilton, P.E.
Registered Professional Engineer

DAH/bc

File: 1162-2-SS

cc: Mr. Joseph Stulb, Xerox Corporation

CAMP DRESSER & MCKEE INC.

1045 The Exchange N.W., Suite 250
Atlanta, Georgia 30339
404 522-0043

Docket # C-57

RECEIVED

JAN 13 1987

Environmental Protection
Lead Protection Branch

APPENDIX I-3

CHECKLISTS FOR THE INSPECTION OF THE CONCRETE CAP AND MONITORING WELLS

FORMER XEROX CRC FACILITY, ATLANTA, GA
 Closed RCRA Unit Inspection Log Sheet
 Regulated Unit

Item	Potential Problems	Status (A/U)	Condition	Nature of Repairs/ RemedialAction	Date of Repair
Surveyed Benchmarks	Not Present Not Visible				
Final Cover (Concrete)	Subsidence Cracked Caulking Condition				
Erosion Damage	Erosion Damage Ponded Water				
Biological Disturbance	Underslab Burrowing Impact of Insects				
Warning Signs	Missing Damaged Illegible				
Security Fence, Gates, Locks	Corrosion Damage				

Note: A = Acceptable
 U =Unacceptable
 All sections must be completed for each item inspected. Please make additional comments on the back of the form, as necessary.

Signature

Date

**FORMER XEROX CRC FACILITY, ATLANTA, GA
MONITORING WELL INSPECTION SHEET**

INSPECTOR: _____
COMPANY: _____

DATE/TIME: _____
MONITORING WELL NO.: _____

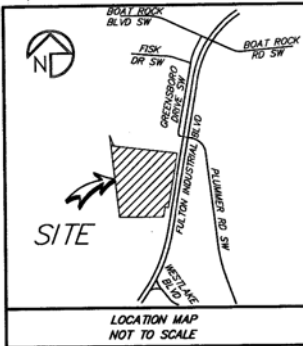
ITEM	YES	NO	COMMENT
1. Well number clearly labeled on well vault or protective metal casing			
2. Metal protective casing or well cap secured with a padlock, and is the lock in good condition			
3. Well vault or metal protective casing free of standing water (dry)			
4. Concrete well apron (pad) in good repair			
5. Well cap present and in good condition			
6. Measuring point for water level clearly marked on top of well casing			
7. Excess vegetation around well pad			
8. Evidence of ponded water around well vault or metal protective cover			
9. Damage to well vault or metal protective cover			
10. Insect infestation in or around the well (e.g., ants, bees, wasps, etc.)			
11. Static water level (from top of casing) gauged (in feet and hundredths of feet)	X	X	
12. Gauge well depth (from top of casing) (in feet and hundredths of feet)	X	X	
13. Sediment accumulation measured (in feet and hundredths of feet)	X	X	
14. Is there significant variation in well depth between gauged reading and reported depth from well log?			

In the event of a "No" response to questions 1-6 or a "Yes" response to questions 7-10 and 14, modifications and/or re-measurements must be made within 45 days. Please note below any modifications completed as a result of the monitoring well inspection.

Item	Date of Completion of Modification	Signature/Company of Person Completing Modification
------	---------------------------------------	--

APPENDIX I-4

SURVEYED PLAT OF THE FORMER USTS AND ASSOCIATED PIPING AREA



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

- (1) 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.
- (2) THE USE OF THE PROPERTY IS RESTRICTED UNDER 40 CFR SUBPART G REGULATIONS.
- (3) 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°56'35" 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°39'31" 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 84°52'35" East 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.

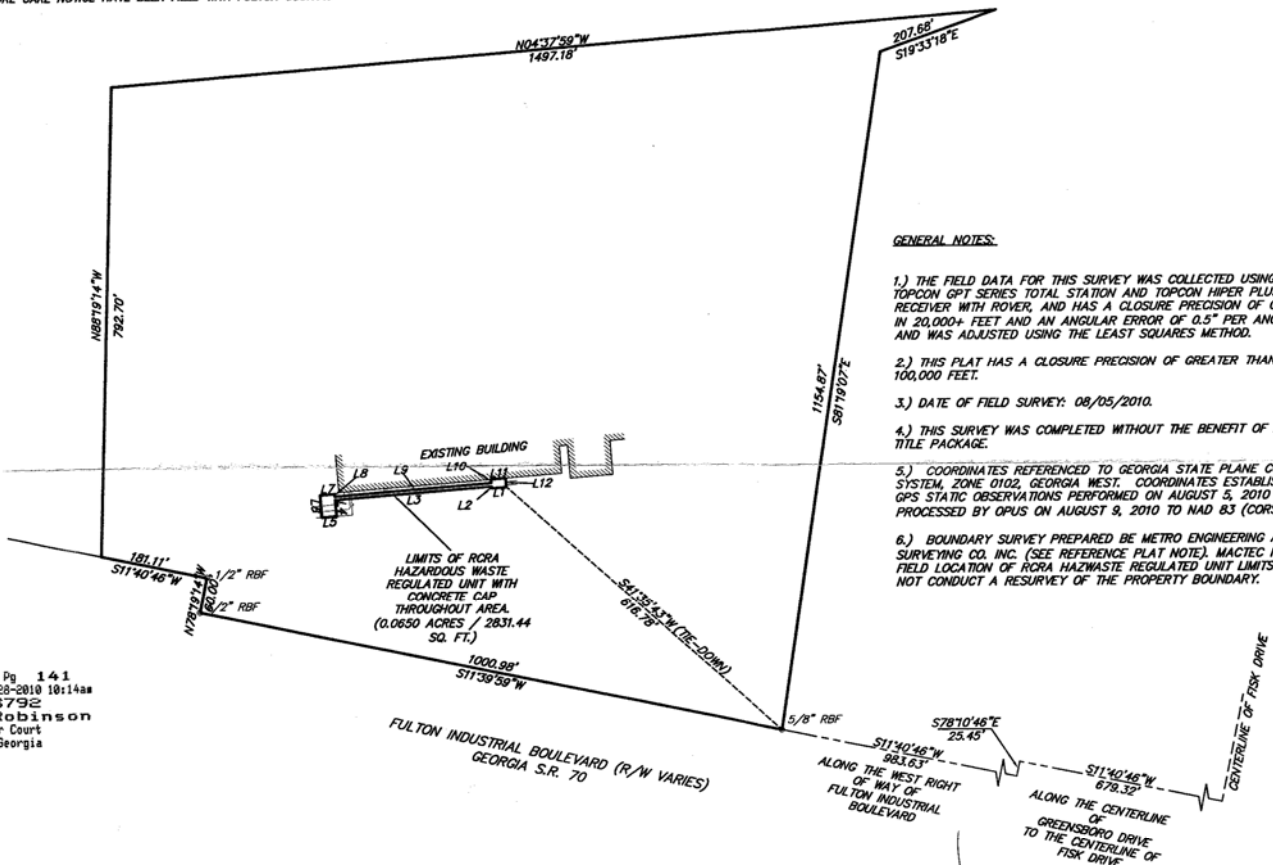
Said parcel described being an area "Limits of RCRA Hazardous Waste Regulated Unit" currently capped with concrete. Reference bearings were taken from a survey for Insite Atlanta, L.L.C., Lawyers Title Insurance Corporation, Xerox Corporation and Compass Bank by Metro Engineering and Surveying Company,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

Plats 352 Pg 141
Filed and Recorded Oct-29-2010 10:14am
2010-0373792
Cathelene Robinson
Clerk of Superior Court
Fulton County, Georgia

LINE	LENGTH	BEARING
L1	24.53	S03°56'35"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

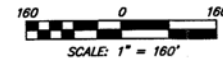
REFERENCE PLAT.

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.



GENERAL NOTES:

- 1.) THE FIELD DATA FOR THIS SURVEY WAS COLLECTED USING A TOPCON GPT SERIES TOTAL STATION AND TOPCON HIPER PLUS GPS RECEIVER WITH ROVER, AND HAS A CLOSURE PRECISION OF ONE FOOT IN 20,000+ FEET AND AN ANGULAR ERROR OF 0.5" PER ANGLE POINT, AND WAS ADJUSTED USING THE LEAST SQUARES METHOD.
- 2.) THIS PLAT HAS A CLOSURE PRECISION OF GREATER THAN 1 FOOT IN 100,000 FEET.
- 3.) DATE OF FIELD SURVEY: 08/05/2010.
- 4.) THIS SURVEY WAS COMPLETED WITHOUT THE BENEFIT OF A CURRENT TITLE PACKAGE.
- 5.) COORDINATES REFERENCED TO GEORGIA STATE PLANE COORDINATE SYSTEM, ZONE 0102, GEORGIA WEST. COORDINATES ESTABLISHED BY GPS STATIC OBSERVATIONS PERFORMED ON AUGUST 5, 2010 AND PROCESSED BY OPUS ON AUGUST 9, 2010 TO NAD 83 (CORS 96).
- 6.) BOUNDARY SURVEY PREPARED BY METRO ENGINEERING AND SURVEYING CO. INC. (SEE REFERENCE PLAT NOTE). MACTEC PROVIDED FIELD LOCATION OF RCRA HAZWASTE REGULATED UNIT LIMITS AND DID NOT CONDUCT A RESURVEY OF THE PROPERTY BOUNDARY.



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

REV	DATE	BY	SUB APP	DESCRIPTION

XEROX CORPORATION
6077 FULTON INDUSTRIAL BOULEVARD, FULTON COUNTY, GEORGIA

MACTEC Engineering and Consulting, Inc.
3200 TOWN POINT DRIVE, SUITE 100
KENNESAW, GEORGIA 30144 (770) 421-3400

SURVEY OF
XEROX CORPORATION
LIMITS OF RCRA HAZARDOUS WASTE
REGULATED UNIT

SCALE	1" = 160'
CONTRACT	1200080019
DWG. NO.	1
REV. PAGE NO.	1

STATE OF CONNECTICUT
COUNTY OF FAIRFIELD

(In re: Fulton County, Georgia)

XEROX CORPORATION, a New York corporation, herein referred to as Declarant, in conformity with and pursuant to Title 42, U. S. Code, Chapters 82 and 103, and 40 Code of Federal Regulations Part 265, hereby declares, that the following described tract or parcel of real property (hereinafter referred to as the Land) shall be encumbered as herein provided:

SEE EXHIBIT A, describing certain lands of 28.866 acres, more or less, attached hereto and incorporated herein by this reference.

- A. The Land has been used to manage hazardous wastes; to wit, EPA hazardous waste No. F001 and F002, as defined by 40 CFR 261.32 (7-1-85 ed).
- B. Following closure of the facility, use of the Land is restricted under 40 CFR Ch.1 (7-1-85 editions), Sec. 265.117 (c), which states:

"Post-closure use of property on or in which hazardous wastes remain after closure must never be allowed to disturb the integrity of the final cover, liner(s), or any other components of any containment system, or the function of the facility's monitoring system, unless the owner or operator can demonstrate to the Director - Georgia EPD either in the post-closure plan or by petition, through the procedures in Sec. 265.118 (c) or (f), as appropriate, that the disturbance:

- (1) Is necessary to the proposed use of the property, and will not increase the potential hazard to human health or the environment; or
- (2) Is necessary to reduce a threat to human health or the environment."

- C. A survey of the type, location, and quantity of waste constituents remaining on the land, to the best knowledge and belief of Declarant, will be filed concurrently with this instrument, with the local zoning authority or the authority with jurisdiction over local land use, and with the Director - Georgia EPD.

GEORGIA Fulton County Clerk's Office Superior Court
Filed & Recorded *April 11, 1991* at 1:19

Jeanette Hicks
CLERK

BOOK 12389 PAGE 252

This Declaration is made in compliance with applicable law, and as public notice of the existence of the matters herein disclosed. This restricting the use thereof within the constraints identified herein or by applicable law, with the express intention that all persons and parties may in any actions now or hereafter be governed accordingly.

WITNESSES:

[Signature]

Barbara L. Howard
NOTARY PUBLIC

STATE OF CONNECTICUT
MY COMMISSION EXPIRES:

BARBARA L. HOWARD
Notary Public
My Commission Expires: 2/21/00

XEROX CORPORATION

BY: *Edward L. Maier*
Edward L. Maier
Director, Real Estate Operations

ATTEST: *Martin S. Wagner*
Martin S. Wagner
Asst. Secretary



EXHIBIT A

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

TO FIND THE TRUE POINT OF BEGINNING, start at the point of intersection of the center line of Fisk Drive with the center line of Greensboro Drive; running thence south 11 degrees 45 minutes 00 seconds west along the center line of Greensboro Drive a distance of 679.32 feet to a point; running thence south 78 degrees 15 minutes 00 seconds east a distance of 25.45 feet to a point on the westerly right-of-way line of Fulton Industrial Boulevard (a 200 foot right-of-way); running thence south 11 degrees 45 minutes 00 seconds west along the westerly right-of-way line of Fulton Industrial Boulevard a distance of 993.63 feet to a point, such point being the TRUE POINT OF BEGINNING; running thence south 11 degrees 45 minutes 00 seconds west along said right-of-way line a distance of 1000.86 feet to a point; running thence north 78 degrees 15 minutes 00 seconds west a distance of 60.00 feet to a point; running thence south 11 degrees 45 minutes 00 seconds west a distance of 181.11 feet to a point; running thence north 88 degrees 15 minutes 00 seconds west a distance of 792.70 feet to a point in the center line of a proposed railroad easement; running thence north 04 degrees 33 minutes 30 seconds west along the center line of said proposed easement a distance of 1496.96 feet to a point; running thence south 19 degrees 29 minutes 30 seconds east a distance of 207.68 feet to a point; running thence south 81 degrees 15 minutes 00 seconds east a distance of 1154.87 feet to a point on the westerly right-of-way line of Fulton Industrial Boulevard and the true point of beginning; as per survey for "Xerox Corp." prepared by James Lucius Grant, Georgia Registered Land Surveyor No. 1604, of Urban Engineers, Inc., dated August 27, 1973, and containing 28.866 acres according to said survey.

Together with a non-exclusive easement for purposes of ingress and egress over the following described tract of land:

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

TO FIND THE TRUE POINT OF BEGINNING, start at the point of intersection of the center line of Fisk Drive with the center line of Greensboro Drive; running thence south 11 degrees 45 minutes 00 seconds west along the center line of Greensboro Drive a distance of 679.32 feet to a point; running thence south 78 degrees 15 minutes 00 seconds east a distance of 25.45 feet to a point on the westerly right-of-way line of Fulton Industrial Boulevard (a 200 foot right-of-way); running thence south 11 degrees 45 minutes 00 seconds west along the westerly right-of-way line of Fulton Industrial Boulevard a distance of 1984.49 feet to a point, such point being the TRUE POINT OF BEGINNING; running thence north 78 degrees 15 minutes 00 seconds west a distance of 60.00 feet to a point; running thence south 11 degrees 45 minutes 00 seconds west a distance of 181.11 feet to a point; running thence south 88 degrees 15 minutes 00 seconds east a distance of 60.93 feet to a point located on the westerly right-of-way line of Fulton Industrial Boulevard; running thence north 11 degrees 45 minutes 00 seconds west along said right-of-way line to the true point of beginning; as per survey for "Xerox Corp." prepared by James Lucius Grant, Georgia Registered Land Surveyor No. 1604, of Urban Engineers, Inc., dated August 27, 1973.

The within described easement shall run with the land in favor of Grantee, its successors and assigns, until such time as the whole of the property described above

over which it runs is dedicated to and accepted by Fulton County, Georgia, for road purposes.

The property described above is conveyed subject to those certain restrictive covenants recorded in Deed Book 5577, Page 94, of the Real Property Records of Fulton County, Georgia, and to a railroad easement, a pole easement, an aerial easement, and a sanitary sewer easement, all contained within an eighty-five (85) foot strip along the western boundary line of subject property, as shown on said plat of survey dated August 27, 1973.

BOOK 12389 PAGE 255

APPENDIX I-5

**FINANCIAL ASSURANCE MECHANISM AND COST ESTIMATE FOR POST-CLOSURE CARE
FOR WHICH FINANCIAL ASSURANCE IS REQUIRED**

APPENDIX I-5

**FINANCIAL ASSURANCE MECHANISM AND COST ESTIMATE FOR POST-CLOSURE CARE
FOR WHICH FINANCIAL ASSURANCE IS REQUIRED**



*Bill Osburn
Chief Financial Officer*

Xerox Corporation
201 Merritt 7
P.O. Box 4505
Norwalk, CT 06851-1056

tel 203-849-2483
fax 203-849-5134

March 23, 2020

Mr. Richard Dunn, Director
Environmental Protection Division
Department of Natural Resources
2 MLK Jr. Drive, S.E., Suite 1154
Atlanta, Georgia 30334-0900

Dear Mr. Dunn:

I am the Chief Financial Officer of Xerox Corporation. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in paragraph 391-3-11-.05 of the Rules of the Department of Natural Resources, Environmental Protection Division.

The firm identified above is the owner or operator of the following facilities for which liability coverage for sudden accidental occurrences is being demonstrated through the financial test specified in paragraph 391-3-11-.05 of the Rules of the Department of Natural Resources, Environmental Protection Division:

Xerox – Webster, New York
ID# NYD002211324 - 800 Phillips Road, Webster, NY 14580
Liability coverage demonstration: \$2 million.

PARC – Palo Alto, California
ID# CAD076296813 - 3333 Coyote Hill Road, Palo Alto, CA 94304
Liability coverage demonstration: \$2 million.

The firm identified above guarantees, through the corporate guarantee specified in paragraph 391-3-11-.05 of the Rules of the Department of Natural Resources, Environmental Protection Division, liability coverage for sudden accidental occurrences at the following facilities owned or operated by the following: **None.**

1. The firm identified above owns or operates the following facilities which are located in the State of Georgia and for which financial assurance for closure and/or post-closure care or liability coverage is demonstrated through the financial test specified in paragraph 391-3-11-.05. The current closure and/or post-closure cost estimates covered by the test are shown for each facility.

Xerox – Atlanta, Georgia
ID# GAD010103202 - 6077 Fulton Industrial Boulevard, Atlanta, GA 30336
Combined closure/post-closure estimate: \$685,830.

2. The firm identified above guarantees, through the guarantee specified in paragraph 391-3-11-.05, the closure and/or post-closure care or liability coverage of the following facilities which are located in the State of Georgia and which are owned or

operated by the guaranteed party. The current cost estimates for the closure and/or post-closure care so guaranteed are shown for each facility: **None**.

3. In states outside of Georgia, where EPA or some designated authority is administering financial responsibility requirements, this firm, is demonstrating financial assurance for the closure and/or post-closure care of the following facilities through the financial test specified in Subpart H of 40 CFR Parts 254 and 265 or through a test which is equivalent or substantially equivalent to it. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:
 1. **Former Xerox – Irvine, California**
ID# CAD058231598 – 18582 Teller Avenue, Irvine, California 92715
Combined closure/post-closure estimate: **\$805,000**.
 2. **PARC – Palo Alto, California**
ID# CAD076296813 - 3333 Coyote Hill Road, Palo Alto, CA 94304
Combined closure/post-closure estimate: **\$78,978**.
 3. **Xerox – Webster, New York**
ID# NYD002211324 - 800 Phillips Road, Webster, NY 14580
Combined closure/post-closure estimate: **\$6,201,602**
4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure and, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: **None**.
5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility: **None**.

The total of the current cost estimates for closure and/or post-closure care and the current plugging and abandonment cost estimates, listed in the five numbered paragraphs above, is **\$7,771,410**. To the best of my knowledge, this figure is sufficient to execute the closure plans and to perform post-closure care responsibilities for all the facilities listed in paragraphs 1. through 5. above.

This firm is **required** to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firms ends on **December 31**. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended **December 31, 2019**.

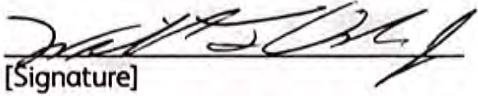
Part B. Closure or Post-Closure and Corrective Action Care and Liability Coverage

Alternative I

1.	Sum of current closure and post-closure and corrective action cost estimates (total of all cost estimates listed above)	\$7,771,410.
2.	Amount of annual aggregate liability coverage to be demonstrated	\$4,000,000.
3.	Sum of lines 1 and 2	\$11,771,410.
*4.	Total liabilities	\$9,173,000,000.
*5.	Tangible net worth	\$1,775,000,000.
*6.	Net worth	\$5,874,000,000.
*7.	Current assets	\$6,140,000,000.
*8.	Current liabilities	\$3,369,000,000.
9.	Net working capital (line 7 minus 8)	\$2,771,000,000.
*10.	The sum of net income plus depreciation, depletion and amortization	\$1,783,000,000.
*11.	Total assets in the U.S. (required only if less than 90 % of assets are located in the U.S.) (long-lived U.S. assets)	\$769,000,000.
12.	Is line 5 at least \$10 million? (Yes/No)	Yes
13.	Is line 5 at least 6 times line 3? (Yes/No)	Yes
14.	Is line 9 at least 6 times line 3?	Yes
*15.	Are at least 90 % of assets located in the U.S.? (Yes/No) If not, complete line 16.	No
16.	Is line 11 at least 6 times line 3? (Yes/No)	Yes
17.	Is line 4 divided by line 6 less than 2.0? (Yes/No)	Yes
18.	Is line 10 divided by line 4 greater than 0.1? (Yes/No)	Yes
19.	Is line 7 divided by line 8 greater than 1.5? (yes/No)	Yes

I hereby certify that the wording of this letter is substantially the same as the as the wording specified in paragraph 391-3-11.05 of the Rules of the Georgia Department of Natural

Resources, Environmental Protection Division as such regulations were constituted on the date shown immediately below.


[Signature]

William F. Osbourn, Jr
Bill Osbourn
[Name]

Chief Financial Officer
[Title]

March 31, 2020
[Date]

ONE TIME FINAL DECOMMISSIONING COSTS

NO.	ITEM	ESTIMATED QUANTITY	UNIT (EA, LF, LS)	UNIT PRICE	ESTIMATED COST
1	Engineering/Consulting; See Attachment 1, Line 1	17	HR	\$135.	\$2,295
2	Well Abandonment; See Attachment 1, Line 2	1	lump sum	\$4,717.5	\$4,718
3	Piping/Equipment Disposal; See Attachment 1, Line 3	1	lump sum	\$5,005.	\$5,005
4	Certification; See Attachment 1, Line 4	1	EA	\$2,500.	\$2,500

2020 ESTIMATE DECOMMISSIONING COSTS: \$14,518
CONTINGENCY COSTS 15% \$2,178
TOTAL DECOMMISSIONING COST **\$16,695**

ASSUMPTION:

- 14 monitoring wells to be abandoned (B-10, 10A,11, 11A, 11B, 11D, 12, 28, 28A, 28B, 29, 29A, 32, 33B)

ESTIMATED ANNUAL CORRECTIVE ACTIONS COSTS

NO.	ITEM	ESTIMATED QUANTITY	UNIT (EA, LF, LS)	UNIT PRICE	ESTIMATED COST
1	January sampling event; See Attachment 2, Line 1	1	EA	\$6,070.	\$6,070
2	Disposal of non-hazardous purged groundwater associated with January sampling event; see attached Capitol Environmental Services, Inc. quote for unit prices	1	EA	\$1,711.	\$1,711
3	July sampling event; See Attachment 2, Line 2	1	EA	\$3,770.	\$3,770
4	Disposal of non-hazardous purged groundwater associated with July sampling event; see attached Capitol Environmental Services, Inc. quote for unit prices	1	EA	\$783.	\$783
	subtotal		annual sampling costs		\$12,334
5	March 2020 SA Report; See Attachment 2, Line 3	1	EA	\$3,140.	\$3,140
6	October 2020 SA Report; See Attachment 2, Line 4	1	EA	\$3,610.	\$3,610
	subtotal		annual reporting costs		\$6,750
7	Annual Site Inspection and Regulatory File Review; See Attachment 2, Line 5	1	EA	\$1,360.	\$1,360
	subtotal		annual inspection/file review costs		\$1,360
8	Annual Site Specific Parameter Sample Analyses - 9 samples (plus 1 QA duplicate) analyzed for PCE/TCE; see attached ALS laboratory quote for unit price	10	EA	\$80.	\$800
9	Appendix IX analyses (2 samples per year); includes Organophosphorus Pesticides, VOCs, Polychlorinated Dibenzodioxins and Dibenzofurans, Extractable Organics (Pesticides, PCBs, SVOCs, Formaldehyde, Herbicides), Metals (Expanded List), and Wet Chemistry (CN res., CN tot., Fluoride, Sulfide); see attached ALS laboratory quote for unit prices	2	EA	\$1,710.	\$3,420
10	VOC QA sample associated with Appendix IX analyses (1 per year); See attached ALS laboratory quote for unit price	1	EA	\$105.	\$105
	subtotal		annual analytical costs		\$4,325

ANNUAL CORRECTIVE ACTION COSTS: \$24,769
CONTINGENCY COSTS 10% \$2,477
ANNUAL CORRECTIVE ACTIONS COSTS with Contingency: **\$27,246**

ASSUMPTIONS:

- Corrective action monitoring is conducted annually (9 samples per year - site parameters)
- Appendix IX sampling is conducted annually (two wells per year)
- Corrective action provision is provided for a minimum period of 30 years
- Semi annual site inspections to be conducted
- Site reporting to be conducted semi-annually.
- Contingency factor is 10% due to constant nature of these costs
- Pending Class 3 Permit modification impacts are not comprehended
- Estimated costs are based on 2020 dollars with no adjustment for inflation included

ESTIMATED VALUE:

ITEM		Number Of Events	Est. Post Closure
ONE TIME CLOSURE / DECOMMISSIONING COST	\$16,695	1	\$16,695
ANNUAL CORRECTIVE ACTIONS COSTS (FOR 30 YEARS)	\$27,246	30	\$817,377
TOTAL			\$834,072

Scope of Work – Former Xerox-Atlanta Facility

1.) It is anticipated the scope of work for the groundwater monitoring and reporting program will be as described below:

- Semi-annual monitoring will be conducted in January and July. Total well depth and depth to groundwater will be determined and the groundwater elevation calculated in upgradient well B-32, in the four B-11 POC wells (B-11, B-11A, B-11B, and B-11D), and in nine wells located down- or side-gradient from the B-11 POC wells (B-10, B-10A, B-12, B-28, B-28A, B-28B, B-29, B-29A, and B-33B).
- Prepare a potentiometric surface map using data from B-32, B-11, B-10, B-28, B-29, and B-12 showing the direction of flow in the uppermost aquifer and determine the groundwater flow rate.
- Groundwater quality sampling in January will consist of collecting samples from nine wells (B-32, B-11, B-11A, B-11B, B-11D, B-28A, B-28B, B-29A, and B-33B). These samples will be analyzed for PCE and TCE only.
- Groundwater quality sampling in July will consist of collecting samples from two POC wells for Appendix IX analyses.
- Conduct data evaluations and prepare semi-annual reports to be submitted in March and September 2020. In addition to a discussion of the results of the groundwater monitoring program and the status of the corrective action program with applicable tables and figures, the semi-annual reports will provide appendices as follows:
 - Chronology of Major Events at the Xerox Atlanta Facility (1984-2020)
 - Groundwater Sampling Procedures
 - Purging and Sampling Records
 - Laboratory Analytical Results
 - Monitoring Well and RCRA CAP Inspection

Attachment 2

Cost Estimate for January through December 2020 Groundwater Monitoring and Reporting Xerox Atlanta Facility

1. January Groundwater Sampling Event

• Technician	30 Hours	\$75/Hr	\$2,250
• Staff Professional	30 Hours	\$75/Hr	\$2,250
• Principal Engineer	2 Hours	\$135/Hr	\$270
• Supplies/Expenses Estimate			\$1,300
		Subtotal	\$6,070

2. July Groundwater Sampling Event (includes Appendix IX sampling)

• Technician	16 Hours	\$75/Hr	\$1,200
• Staff Professional	20 Hours	\$75/Hr	\$1,500
• Principal Engineer	2 Hours	\$135/Hr	\$270
• Supplies/Expenses Estimate			\$800
		Subtotal	\$3,770

3. Semi-Annual Reporting (March 2020)

• Staff Professional	4 Hours	\$75/Hr	\$300
• Project Professional	4 Hours	\$90/Hr	\$360
• Senior Professional	4 Hours	\$110/Hr	\$440
• Principal Professional	8 Hours	\$135/Hr	\$1,080
• Administrative Support	8 Hours	\$50/Hr	\$400
• Drafting	6 Hours	\$60/Hr	\$360
• Copies Estimate			\$200
		Subtotal	\$3,140

4. Semi-Annual Reporting (October 2020)

• Staff Professional	4 Hours	\$75/Hr	\$300
• Project Professional	4 Hours	\$90/Hr	\$360
• Senior Professional	4 Hours	\$110/Hr	\$440
• Principal Professional	10 Hours	\$135/Hr	\$1,350
• Administrative Support	10 Hours	\$50/Hr	\$500
• Drafting	6 Hours	\$60/Hr	\$360
• Copies Estimate			\$300
		Subtotal	\$3,610

5. Annual Site Inspection and Regulatory File Review

• Principal Professional	6 Hours	\$135/Hr	\$810
• Technician	6 Hours	\$75/Hr	\$450
• Administrative Support	2 Hours	\$50/Hr	\$100
		Subtotal	\$1,360

Estimate Total **\$17,950**



ESTIMATE # 24655

DATE 3/16/2020

ESTIMATE

NAME / ADDRESS

FROM

Wood Env. & Infrastructure Solutions, Inc
 John Quinn
 3200 Town Pointe Dr. Ste. 100
 Kennesaw, GA 30144
 (770) 421-3400

Geo Lab
 PO Box 1169
 Dacula, GA 30019

 Prepared By: J. Grantham

Geo Lab Project ID

PROJECT

ATL-Camp Creek 03/20

Frmr Xerox Facility

DESCRIPTION	QTY	COST	TOTAL
Mob and Demob for metro-Atlanta area Well Abandonment Services.	1	375.00	375.00
Cost per foot for 2" well abandonment by tremie grouting in place.	965	4.50	4,342.50
Cost per 3'x3' well pad for complete removal, onsite disposal, and surface patch.	14	175.00	2,450.00
Cost per ton for offsite construction debris disposal	4	395.00	1,580.00
Daily Rental of Track mounted skid steer with pick up and delivery	1	975.00	975.00
<p>Estimated SOW: Abandoning fourteen 2" PVC wells by pressure tremie grouting in place. All pads will be removed and the area resurfaced to match the surrounding area. All debris will be removed from the site. Only a few locations are not truck accessible.</p>			
<p>**Purchaser acknowledges their responsibility to call the 811 UPC prior to Geo Lab's arrival onsite, when scheduling.**</p>			

Thank-you for Using Geo Lab. (Pricing valid for 90 days)

TOTAL

\$9,722.50

10/19/2020
 Prepared for: Xerox



ALS Environmental
 1565 Jefferson Rd.
 Rochester, NY 14623
 Phone: 585-288-5380

Prepared by: Michael Chevalier - Technical Sales Representative
 585-622-2631
michael.chevalier@alsglobal.com

Xerox - Atlanta						NY EQUIS EDD & NY ASP-Level A and B Deliverables Available		
PARAMETER	METHOD	MATRIX	QTY	TAT	UNIT PRICE	TAT SURCHARGE	ADJUSTED UNIT PRICE	TOTALS
Organophosphorus Pesticides	8141	W	2	Standard 10 BD	\$225.00	NA	N/A	\$450.00
VOCs	8260C	W	3	Standard 10 BD	\$105.00	NA	N/A	\$315.00
Polychlorinated Dibenzodioxins and Polychlorinated Dibenzofurans	8290	W	2	Standard 10 BD	\$600.00	NA	N/A	\$1,200.00
Extractable Organics (Pesticides, PCBs, SVOCs, Formaldehyde, Herbicides)	8081/8082/8270,8315,8151	W	2	Standard 10 BD	\$540.00	NA	N/A	\$1,080.00
Metals - Expanded List	6010C	W	2	Standard 10 BD	\$150.00	NA	N/A	\$300.00
Wet Chemistry (CN res., CN tot., Fluoride, Sulfide)	Kelada, 300	W	2	Standard 10 BD	\$90.00	NA	N/A	\$180.00
VOC's (PCE,TCE)	8260c	w	2	Standard 10 BD	\$80.00	NA	N/A	\$160.00
SAMPLES TOTAL:								\$3,685.00
Inquire for ALS Rochester Sample Courier Service								
Tier 2 Deliverable done in 10 Standard BD.								
Table Notes								

TURN AROUND TIMES & DELIVERABLES (Dependent on lab capacity)

Standard 10 Business Day TAT		NC
5 Business Day TAT	1.25x	25%
3 Business Day TAT	1.50x	50%
2 Business Day TAT	1.75x	75%
1 Business Day TAT	2.0x	100%
Same Day TAT	3.0x	200%
Standard Electronic Deliverable		NC

PRICING INCLUDES SAMPLE CONTAINERS, LABELS, COOLERS, CHAIN OF CUSTODY FORMS, 24/7 RESULTS ACCESS VIA WEBTRIEVE, ETC.



CAPITOL
ENVIRONMENTAL
SERVICES, INC.

200 BIDDLE AVE, SUITE 205
NEWARK, DE 19702
302-380-3737
302-380 3730 FAX
WWW.CAPITOLENV.COM

November 5, 2020

Wood.
Attn: John Quinn

Capitol Environmental Services is pleased to present the following quotation for providing the hauling and disposal of water located in Atlanta, GA. Pricing will be as follows:

<u>ITEM</u>	<u>UNIT RATE</u>	<u>QUANTITY</u>	<u>TOTAL</u>
Disposal Non Hazardous Waste	\$200.00	6	\$1,200.00
Transportation	\$225.00	1	\$225.00
Admin/E manifesting	\$50.00	1	\$50.00
Energy and Insurance	16%	1	\$236.00
<u>ESTIMATED TOTAL:</u>			\$1,711.00

Rates are subject to profile approval.
Payment terms are NET 30 from receipt of invoice.

Thank you for the opportunity to provide this proposal. Please don't hesitate to contact me if you have any questions.

Thank you,
Alisha Thompson
(313) 319-8106
athompson@capitolenv.com



CAPITOL
ENVIRONMENTAL
SERVICES, INC.

200 BIDDLE AVE, SUITE 205
NEWARK, DE 19702
302-380-3737
302-380 3730 FAX
WWW.CAPITOLENV.COM

November 5, 2020

Wood.
Attn: John Quinn

Capitol Environmental Services is pleased to present the following quotation for providing the hauling and disposal of water located in Atlanta, GA. Pricing will be as follows:

<u>ITEM</u>	<u>UNIT RATE</u>	<u>QUANTITY</u>	<u>TOTAL</u>
Disposal Non Hazardous Waste	\$200.00	2	\$400.00
Transportation	\$225.00	1	\$225.00
Admin/E manifesting	\$50.00	1	\$50.00
Energy and Insurance	16%	1	\$108.00
<u>ESTIMATED TOTAL:</u>			\$783.00

Rates are subject to profile approval.
Payment terms are NET 30 from receipt of invoice.

Thank you for the opportunity to provide this proposal. Please don't hesitate to contact me if you have any questions.

Thank you,
Alisha Thompson
(313) 319-8106
athompson@capitolenv.com