

July 12, 2013

Mr. David Brownlee
Response and Remediation Program
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Drive
Suite 1462 East Tower
Atlanta, Georgia 30334

Re: Semi-Annual Progress Report
Gwinnett Regional Distribution Center Property (HSI No. 10844)
3312 North Berkeley Lake Road
Duluth, Georgia

Dear Mr. Brownlee:

On behalf of our client, 3312 Berkeley Lake Road Investors, LLC, ENVIRON International Corporation (ENVIRON) is pleased to provide you with this Semi-Annual Progress Report for the Gwinnett Regional Distribution Center Property (GRDC) site located at 3312 North Berkeley Lake Road in Duluth, Georgia, Gwinnett County, Georgia (the "site"). This report summarizes the activities that have taken place since the last semi-annual status report for the Voluntary Investigation and Remediation Plan (VIRP) which was submitted on January 13, 2013.

Recent Site Activities

The site continues to function as a warehousing and distribution center, with the majority of the property covered by buildings or asphalt. The only activity conducted at the site since the last semi-annual report (January 2013) was based on comments provided by the Georgia Environmental Protection Division (GA EPD) during a site reconnaissance with ENVIRON on June 6, 2013. The GA EPD requested that soil samples be collected from two grass-covered locations on the eastern side of the building that were not sampled previously. A summary of the sampling event is described below.

Soil Sampling

As requested by the GA EPD, soil samples were collected on June 12, 2013, from two grass-covered locations (SS-21 and SS-22) on the east side of the GRDC building (**Figure 1**). The samples were collected using a hand auger. Two samples were collected from each location, one surface soil sample (0.5 to 1 foot below ground surface [bgs]) and one subsurface soil location (4 to 5 feet bgs). The samples were placed in clean, appropriately-preserved laboratory-supplied containers, sealed, labeled, and placed on ice pending delivery under standard chain-of-custody procedures to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia, for analysis. The soil samples were analyzed for arsenic by USEPA Method 6010.

Table 1 presents the analytical results for both locations. The laboratory data are provided in **Appendix A**.

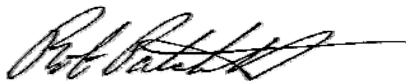
Results

The results of the soil samples collected from grass-covered areas indicate that arsenic was present in the surface soil (0.5 to 1 foot bgs) at both locations at concentrations exceeding the surface soil risk reduction standard of 38 mg/kg. The concentrations of arsenic detected in the subsurface soil (4 to 5 feet bgs) at both locations are less than the Type 4 subsurface soil risk reduction standard of 130 mg/kg (GA EPD Comment Responses dated May 30, 2013).

In accordance with the approved schedule, the next semi-annual status report will be submitted in January 2014. Activities at the site between the submittal of this report and then will be detailed in that report. As requested by GA EPD, a monthly summary of the hours invoiced by ENVIRON and a description of the services we provided are provided in **Appendix B**. Prior to the submittal of the next semi-annual status report, we anticipate submitting responses to the GA EPD comments on the January 10, 2013, progress report dated May 30, 2013.

Please let us know if you have any questions about the information provided in this report, including the attached materials, or any other project-related matter.

Sincerely,



Robert G. Patchett, PG
Manager



Jeff Margolin, RHSP
Principal

cc: Kevin Coughlin (High Street Equity Advisors LLC)
Amy Magee, (King & Spalding)

TABLE

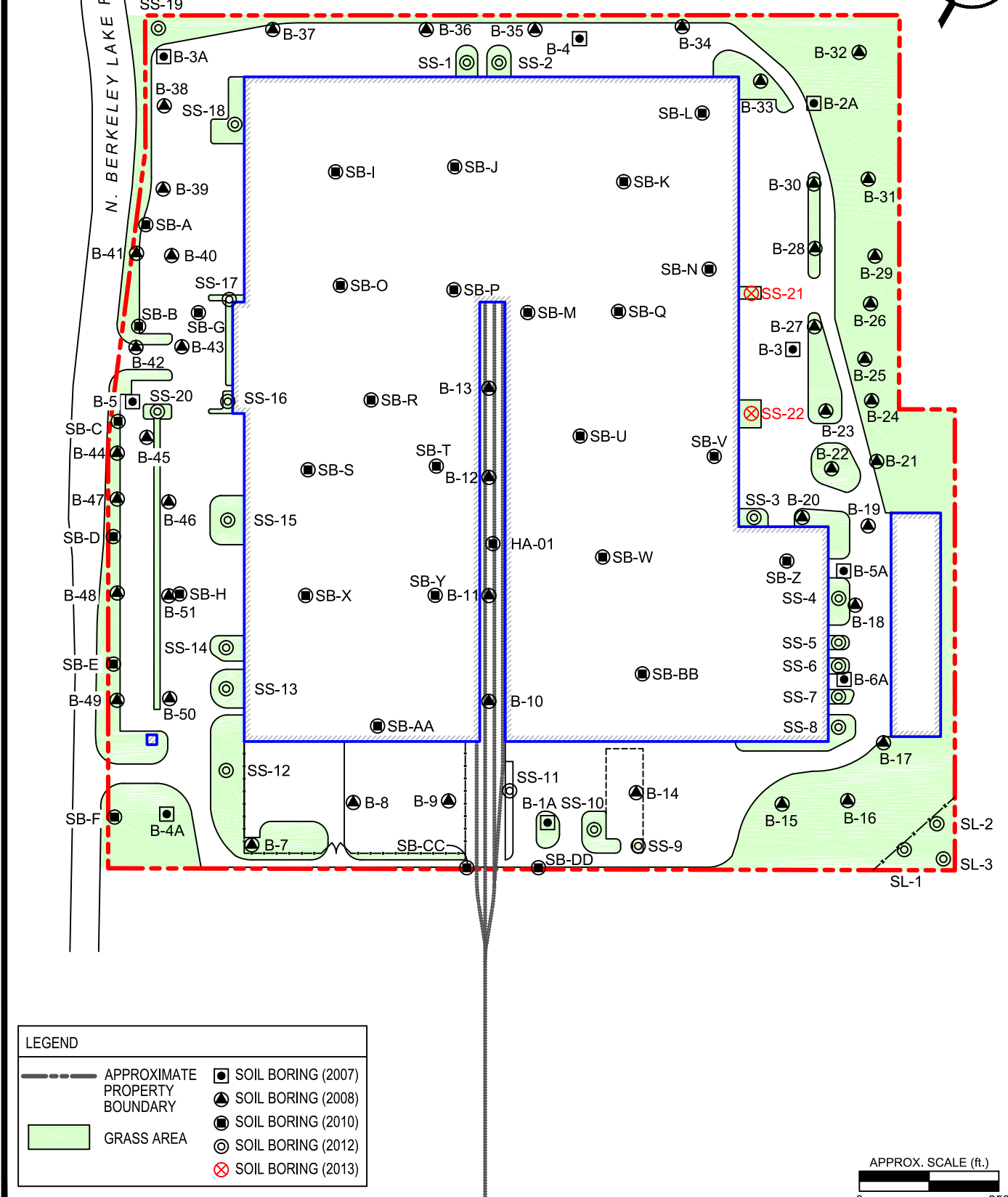
Table 1. Summary of Soil Data - June 2013
Gwinnett Regional Distribution Center
HSI No. 10844

Sample ID	Type 4 Risk Reduction Standard (mg/kg)	Arsenic (mg/kg)
SS-21 (0.5-1.0)	38	73.6
SS-21 (4-5)	130	34.7
SS-22 (0.5-1.0)	38	139
SS-22 (4-5)	130	124

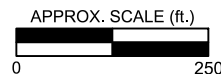
Notes:

Bold value indicates the concentration exceeds the risk reduction standard.

FIGURE



LEGEND	
	APPROXIMATE PROPERTY BOUNDARY
	GRASS AREA
	SOIL BORING (2007)
	SOIL BORING (2008)
	SOIL BORING (2010)
	SOIL BORING (2012)
	SOIL BORING (2013)



SOIL SAMPLING LOCATIONS
GWINNETT REGIONAL DISTRIBUTION CENTER - HSI No. 10844
3312 NORTH BERKELEY LAKE ROAD
DULUTH, GEORGIA

FIGURE
1

APPENDIX A

Laboratory Analytical Reports



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

June 26, 2013

Ken Nye
ENVIRON International Corp.
1600 Parkwood Circle
Atlanta GA 30339

TEL: (770) 874-5010
FAX: (770) 874-8011

RE: GRDC

Dear Ken Nye:

Order No: 1306B61

Analytical Environmental Services, Inc. received 4 samples on 6/13/2013 3:15:00 PM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

- NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/12-06/30/13.
- AIHA-LAP, LLC Laboratory ID: 100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/13.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Tara Esbeck
Project Manager



ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

CHAIN OF CUSTODY

Work Order: **1306861**

Date: **06/12/2013** Page **1** of **1**

COMPANY:		ADDRESS:		ANALYSIS REQUESTED		REMARKS		No # of Containers	
ENVIRON		1600 Parkwood Circle Suite 310 Atlanta, GA 30339		Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.					
PHONE: 770-874-5010		FAX: 770-874-5011		PRESERVATION (See codes)					
SAMPLED BY: Kenneth Nye		SIGNATURE: <i>[Signature]</i>							
#	SAMPLE ID	DATE	TIME	SAMPLED	Grab	Composite	Matrix (See codes)		
1	SS-21 (0.5-1.0)	06/12/2013	1135	X	X		SO	1	
2	SS-21 (4-5)	06/12/2013	1250	X	X		SO	1	Hold
3	SS-22 (0.5-1.0)	06/12/2013	1340	X	X		SO	1	
4	SS-22 (4-5)	06/12/2013	1440	X	X		SO	1	Hold
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME	PROJECT INFORMATION	RECEIPT
<i>[Signature]</i>	6/12/13 1515	<i>[Signature]</i>	6/12/13 3:15 PM	PROJECT NAME: GRDC	Total # of Containers: 4
				PROJECT #: 07-30134A	
				SITE ADDRESS: North Berkeley Lake Road Duluth, GA	
				SEND REPORT TO: Kenneth Nye	
				INVOICE TO: (IF DIFFERENT FROM ABOVE)	
SPECIAL INSTRUCTIONS/COMMENTS:				Turnaround Time Request Standard 5 Business Days 2 Business Day Rush Next Business Day Rush Same Day Rush (auth req.) Other	
OUT / / VIA:				STATE PROGRAM (if any):	
IN / / VIA:				E-mail? Y / N; Fax? Y / N	
CLIENT: FedEx UPS MAIL COURIER				DATA PACKAGE: I II III IV	
GREYHOUND OTHER				QUOTE #:	

Client: ENVIRON International Corp.**Project:** GRDC**Lab ID:** 1306B61**Case Narrative**

Analyze both samples perviously on hold per Ken Nye email 6/20/13

Analytical Environmental Services, Inc**Date:** 26-Jun-13

Client: ENVIRON International Corp.
Project Name: GRDC
Lab ID: 1306B61-001

Client Sample ID: SS-21(0.5-1.0)
Collection Date: 6/12/2013 11:35:00 AM
Matrix: Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
METALS, TOTAL								
SW6010C								
					(SW3050B)			
Arsenic	73.6	5.82		mg/Kg-dry	177479	1	06/18/2013 11:29	JY
PERCENT MOISTURE								
D2216								
Percent Moisture	14.4	0		wt%	R246376	1	06/18/2013 17:00	LW

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc**Date:** 26-Jun-13

Client: ENVIRON International Corp.
Project Name: GRDC
Lab ID: 1306B61-002

Client Sample ID: SS-21(4-5)
Collection Date: 6/12/2013 12:50:00 PM
Matrix: Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
METALS, TOTAL SW6010C					(SW3050B)			
Arsenic	34.7	5.41		mg/Kg-dry	177731	1	06/21/2013 19:06	MR
PERCENT MOISTURE D2216								
Percent Moisture	13.7	0		wt%	R246753	1	06/24/2013 12:00	AS

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc**Date:** 26-Jun-13

Client: ENVIRON International Corp.
Project Name: GRDC
Lab ID: 1306B61-003

Client Sample ID: SS-22(0.5-1.0)
Collection Date: 6/12/2013 1:40:00 PM
Matrix: Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
METALS, TOTAL SW6010C					(SW3050B)			
Arsenic	139	5.48		mg/Kg-dry	177479	1	06/18/2013 11:33	JY
PERCENT MOISTURE D2216								
Percent Moisture	16.6	0		wt%	R246376	1	06/18/2013 17:00	LW

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc**Date:** 26-Jun-13

Client: ENVIRON International Corp.
Project Name: GRDC
Lab ID: 1306B61-004

Client Sample ID: SS-22(4-5)
Collection Date: 6/12/2013 2:40:00 PM
Matrix: Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
METALS, TOTAL SW6010C					(SW3050B)			
Arsenic	124	5.69		mg/Kg-dry	177731	1	06/21/2013 19:10	MR
PERCENT MOISTURE D2216								
Percent Moisture	17.1	0		wt%	R246753	1	06/24/2013 12:00	AS

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Environ - Atlanta

Work Order Number 1306061

Checklist completed by Andr 6.13.13
Signature Date

Carrier name: FedEx ☐ UPS ☐ Courier ☐ Client ☒ US Mail ☐ Other ☐

Shipping container/cooler in good condition? Yes ☒ No ☐ Not Present ☐

Custody seals intact on shipping container/cooler? Yes ☐ No ☐ Not Present ☒

Custody seals intact on sample bottles? Yes ☐ No ☐ Not Present ☒

Container/Temp Blank temperature in compliance? ($4^{\circ}\text{C} \pm 2$)* Yes ☒ No ☐

Cooler #1 3.3 Cooler #2 ☐ Cooler #3 ☐ Cooler #4 ☐ Cooler #5 ☐ Cooler #6 ☐

Chain of custody present? Yes ☒ No ☐

Chain of custody signed when relinquished and received? Yes ☒ No ☐

Chain of custody agrees with sample labels? Yes ☒ No ☐

Samples in proper container/bottle? Yes ☒ No ☐

Sample containers intact? Yes ☒ No ☐

Sufficient sample volume for indicated test? Yes ☒ No ☐

All samples received within holding time? Yes ☒ No ☐

Was TAT marked on the COC? Yes ☒ No ☐

Proceed with Standard TAT as per project history? Yes ☐ No ☐ Not Applicable ☒

Water - VOA vials have zero headspace? No VOA vials submitted ☒ Yes ☐ No ☐

Water - pH acceptable upon receipt? Yes ☐ No ☐ Not Applicable ☒

Adjusted? ☐ Checked by ☐

Sample Condition: Good ☒ Other(Explain) ☐

(For diffusive samples or AIHA lead) Is a known blank included? Yes ☐ No ☒

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

\\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Client: ENVIRON International Corp.
 Project Name: GRDC
 Workorder: 1306B61

ANALYTICAL QC SUMMARY REPORT

BatchID: 177479

Sample ID: MB-177479	Client ID:					Units: mg/Kg	Prep Date: 06/17/2013	Run No: 246233			
SampleType: MBLK	TestCode: METALS, TOTAL	SW6010C				BatchID: 177479	Analysis Date: 06/18/2013	Seq No: 5158694			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic BRL 5.00

Sample ID: LCS-177479	Client ID:					Units: mg/Kg	Prep Date: 06/17/2013	Run No: 246233			
SampleType: LCS	TestCode: METALS, TOTAL	SW6010C				BatchID: 177479	Analysis Date: 06/18/2013	Seq No: 5158692			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic 50.80 5.00 50.00 102 80 120

Sample ID: 1306D40-002BMS	Client ID:					Units: mg/Kg-dry	Prep Date: 06/17/2013	Run No: 246233			
SampleType: MS	TestCode: METALS, TOTAL	SW6010C	BatchID: 177479				Analysis Date: 06/18/2013	Seq No: 5158703			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic 65.51 6.43 64.32 3.796 95.9 75 125

Sample ID: 1306D40-002BMSD	Client ID:					Units: mg/Kg-dry	Prep Date: 06/17/2013	Run No: 246233			
SampleType: MSD	TestCode: METALS, TOTAL	SW6010C	BatchID: 177479				Analysis Date: 06/18/2013	Seq No: 5158704			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic 65.71 6.44 64.38 3.796 96.2 75 125 65.51 0.316 20

Qualifiers:	> Greater than Result value	< Less than Result value	B Analyte detected in the associated method blank
	BRL Below reporting limit	E Estimated (value above quantitation range)	H Holding times for preparation or analysis exceeded
	J Estimated value detected below Reporting Limit	N Analyte not NELAC certified	R RPD outside limits due to matrix
	Rpt Lim Reporting Limit	S Spike Recovery outside limits due to matrix	

Client: ENVIRON International Corp.
Project Name: GRDC
Workorder: 1306B61

ANALYTICAL QC SUMMARY REPORT

BatchID: 177731

Sample ID: MB-177731	Client ID:				Units: mg/Kg	Prep Date: 06/21/2013	Run No: 246612				
SampleType: MBLK	TestCode: METALS, TOTAL	SW6010C	BatchID: 177731			Analysis Date: 06/21/2013	Seq No: 5166496				
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic BRL 5.00

Sample ID: LCS-177731	Client ID:					Units: mg/Kg	Prep Date: 06/21/2013	Run No: 246612			
SampleType: LCS	TestCode: METALS, TOTAL	SW6010C				BatchID: 177731	Analysis Date: 06/21/2013	Seq No: 5166494			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic 49.27 5.00 50.00 98.5 80 120

Sample ID: 1306157-001BMS	Client ID:					Units: mg/Kg-dry	Prep Date: 06/21/2013	Run No: 246612			
SampleType: MS	TestCode: METALS, TOTAL	SW6010C				BatchID: 177731	Analysis Date: 06/21/2013	Seq No: 5166506			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic 52.42 5.91 59.08 0.6967 87.5 75 125

Sample ID: 1306157-001BMSD	Client ID:					Units: mg/Kg-dry	Prep Date: 06/21/2013	Run No: 246612			
SampleType: MSD	TestCode: METALS, TOTAL	SW6010C	BatchID: 177731				Analysis Date: 06/21/2013	Seq No: 5166509			
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic 53.36 5.91 59.08 0.6967 89.1 75 125 52.42 1.77 20

Qualifiers:	>	Greater than Result value	<	Less than Result value	B	Analyte detected in the associated method blank
	BRL	Below reporting limit	E	Estimated (value above quantitation range)	H	Holding times for preparation or analysis exceeded
	J	Estimated value detected below Reporting Limit	N	Analyte not NELAC certified	R	RPD outside limits due to matrix
	Rpt Lim	Reporting Limit	S	Spike Recovery outside limits due to matrix		

APPENDIX B
Monthly Summary of Hours

CERTIFICATION AND SUPPORTING DOCUMENTATIONS

Second VIRP Semi-Annual Progress Report

Gwinnett Regional Distribution Center

HSI Site No. 10844

July 12, 2013

"I certify under penalty of law that the accompanying report referenced above and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, et seq.). I am a professional engineer/professional geologist who is registered with the Georgia State Board of Registration for Professional Engineers and Land Surveyors/Georgia State Board of Registration for Professional Geologists and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances.

Furthermore, to document my direct oversight of the Voluntary Remediation Program Plan development, implementation of corrective action, and long term monitoring, I have attached a monthly summary of hours invoiced and description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division.

The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Robert G. Patchett, P.G
Registration No. 1639



Date

Monthly Summary of Project Hours - January 2013 through July 2013
Gwinnett Regional Distribution Center - HSI No. 10844

Task:	January	February	March	April	May	June	Total
Additional Soil Investigation/Evaluation	--	--	--	--	--	12	12
Communication/Project Management	14	2	--	19	9	5	49
Semi-Annual Progress Report	--	--	--	--	--	4	4
Total Hours:	14	2	0	19	9	21.0	65