



SAILORS ENGINEERING ASSOCIATES, INC.

1675 SPECTRUM DRIVE • LAWRENCEVILLE, GEORGIA 30043 • TEL (770) 962-5922 • FAX 962-7964

**VOLUNTARY REMEDIATION PROGRAM APPLICATION
VOLUNTARY INVESTIGATION AND REMEDIATION PLAN
AMERICAN AMALGAMATED/EXECUTIVE CLEANERS
3870 AND 3880 LAWRENCEVILLE HIGHWAY
LAWRENCEVILLE, GWINNETT COUNTY, GEORGIA**

**HSI #10523
SEA JOB NO. 172-090**

**SUBMITTED:
APRIL 6, 2018**



SAILORS ENGINEERING ASSOCIATES, INC.

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April 6, 2018

Mr. Jason Metzger
Georgia Department of Natural Resources
Environmental Protection Division
205 Butler Street, S.E.
Floyd Towers East, Suite 1054
Atlanta, GA 30334

RE: VRP Application
American Amalgamated/Executive Cleaners
3870 and 3880 Lawrenceville Highway
Lawrenceville, Gwinnett County, Georgia
HSI #10523
SEA Job No. 172-090

Dear Mr. Metzger:

Sailors Engineering Associates, Inc. (SEA) appreciates this opportunity to submit this Voluntary Remediation Program application and Voluntary Investigation and Remediation Plan (VIRP) on behalf of Olympia Management, Inc. This application and attached check for \$5,000.00 constitute an application for the Voluntary Remediation Program.

I certify, under penalty of law, that the enclosed electronic copy is complete, identical to the paper copy, and virus free.

If you have any questions or require any additional information, please contact us at your convenience.

Respectfully submitted,

SAILORS ENGINEERING ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "Michael J. Haller", is written over the company name.

Michael J Haller, P.G.
Manager, Environmental Engineering

cc: Mr. Sterling Westdrop, Olympia Management, Inc.

Voluntary Investigation and Remediation Plan Application Form and Checklist

VRP APPLICANT INFORMATION

COMPANY NAME	Olympia Management, Inc.		
CONTACT PERSON/TITLE	Sterling Westrop/President		
ADDRESS	P.O. Box 279, Lilburn, Georgia 30048		
PHONE	404-886-5773	FAX	E-MAIL srwest3@aol.com

GEORGIA CERTIFIED PROFESSIONAL GEOLOGIST OR PROFESSIONAL ENGINEER OVERSEEING CLEANUP

NAME	Michael J. Haller		GA PE/PG NUMBER	1062
COMPANY	Sailors Engineering Associates, Inc.			
ADDRESS	1675 Spectrum Drive, Lawrenceville, GA 30043			
PHONE	770-962-5922	FAX	770-962-7964	E-MAIL mike@sailors-engineering.com

APPLICANT'S CERTIFICATION

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


- (1) The property must have a release of regulated substances into the environment;
- (2) The property shall not be:
 - (A) Listed on the federal National Priorities List pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. Section 9601.
 - (B) Currently undergoing response activities required by an order of the regional administrator of the federal Environmental Protection Agency; or
 - (C) A facility required to have a permit under Code Section 12-8-66.
- (3) Qualifying the property under this part would not violate the terms and conditions under which the division operates and administers remedial programs by delegation or similar authorization from the United States Environmental Protection Agency.
- (4) Any lien filed under subsection (e) of Code Section 12-8-96 or subsection (b) of Code Section 12-13-12 against the property shall be satisfied or settled and released by the director pursuant to Code Section 12-8-94 or Code Section 12-13-6.

In order to be considered a participant under the VRP:


- (1) The participant must be the property owner of the voluntary remediation property or have express permission to enter another's property to perform corrective action.
- (2) The participant must not be in violation of any order, judgment, statute, rule, or regulation subject to the enforcement authority of the director.

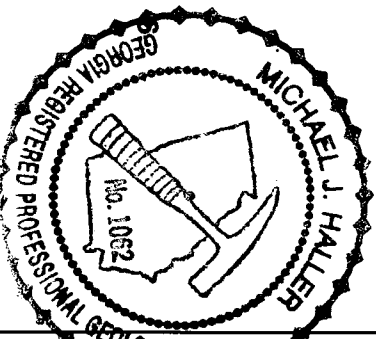
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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

APPLICANT'S SIGNATURE			
APPLICANT'S NAME/TITLE (PRINT)	John C. Allen, Counsel for Olympia Management, Inc.		DATE April 6, 2018

QUALIFYING PROPERTY INFORMATION (For additional qualifying properties, please refer to the last page of application form)			
HAZARDOUS SITE INVENTORY INFORMATION (if applicable)			
HSI Number	10523	Date HSI Site listed	February 11, 1999
HSI Facility Name	American Amalgamated/Executive Dry Cleaners	NAICS CODE	812320
PROPERTY INFORMATION			
TAX PARCEL ID	R6131A023 and R6131A503	PROPERTY SIZE (ACRES)	7.85
PROPERTY ADDRESS	3870 and 3880 Lawrenceville Highway		
CITY	Lawrenceville	COUNTY	Gwinnett
STATE	Georgia	ZIPCODE	30044
LATITUDE (decimal format)	33.90694444	LONGITUDE (decimal format)	-84.10861111
PROPERTY OWNER INFORMATION			
PROPERTY OWNER(S)	Olympia Management Inc.(3870) and SW FARMS LLC (3880)	PHONE #	
MAILING ADDRESS		STATE/ZIPCODE	
CITY			
ITEM #	DESCRIPTION OF REQUIREMENT	Location in VRP (i.e., Table #, Figure #, etc.)	For EPD Comment Only (Leave Blank)
1.	\$5,000 APPLICATION FEE IN THE FORM OF A CHECK PAYABLE TO THE GEORGIA DEPARTMENT OF NATURAL RESOURCES. (PLEASE LIST CHECK DATE AND CHECK NUMBER IN COLUMN TITLED "LOCATION IN VRP." PLEASE DO NOT INCLUDE A SCANNED COPY OF CHECK IN ELECTRONIC COPY OF APPLICATION.)	Check# _____ Dated _____	
2.	WARRANTY DEED(S) FOR QUALIFYING PROPERTY.	Appendix 3	
3.	TAX PLAT OR OTHER FIGURE INCLUDING QUALIFYING PROPERTY BOUNDARIES, ABUTTING PROPERTIES, AND TAX PARCEL IDENTIFICATION NUMBER(S).	Appendix 3	
4.	ONE (1) PAPER COPY AND TWO (2) COMPACT DISC (CD) COPIES OF THE VOLUNTARY REMEDIATION PLAN IN A SEARCHABLE PORTABLE DOCUMENT FORMAT (PDF).	Included	
5.	The VRP participant's initial plan and application must include, using all reasonably available current information to the extent known at the time of application, a graphic three-dimensional preliminary conceptual site model (CSM) including a preliminary remediation plan with a table of delineation standards, brief supporting text, charts, and figures (no more than 10 pages, total) that illustrates the site's surface and subsurface setting, the known or suspected source(s) of contamination, how contamination might move within the environment, the potential human health and ecological receptors, and the complete or incomplete exposure pathways that may exist at the site; the preliminary CSM must be updated as the investigation and remediation progresses and an up-to-date CSM must be included in each semi-annual status report submitted to the director by the participant; a PROJECTED MILESTONE SCHEDULE for investigation and remediation of the site, and after enrollment as a participant, must update the schedule in each semi-	CSM - Section 2.0 & Appendix 1 Milestone – Section 4 & Appendix 4 Figures – Appendix 1 Tables – Appendix 2	

	<p>annual status report to the director describing implementation of the plan during the preceding period. A Gantt chart format is preferred for the milestone schedule.</p> <p>The following four (4) generic milestones are required in all initial plans with the results reported in the participant's next applicable semi-annual reports to the director. The director may extend the time for or waive these or other milestones in the participant's plan where the director determines, based on a showing by the participant, that a longer time period is reasonably necessary:</p>		
5.a.	<p>Within the first 12 months after enrollment, the participant must complete horizontal delineation of the release and associated constituents of concern on property where access is available at the time of enrollment;</p>	Section 4 & Appendix 4	
5.b.	<p>Within the first 24 months after enrollment, the participant must complete horizontal delineation of the release and associated constituents of concern extending onto property for which access was not available at the time of enrollment;</p>	Section 4 & Appendix 4	
5.c.	<p>Within 30 months after enrollment, the participant must update the site CSM to include vertical delineation, finalize the remediation plan and provide a preliminary cost estimate for implementation of remediation and associated continuing actions; and</p>	Section 4 & Appendix 4	
5.d.	<p>Within 60 months after enrollment, the participant must submit the compliance status report required under the VRP, including the requisite certifications.</p>	Section 4 & Appendix 4	
	<p>SIGNED AND SEALED PEPG CERTIFICATION AND SUPPORTING DOCUMENTATION:</p> <p>"I certify under penalty of law that this report and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, et seq.). I am a professional engineer/professional geologist who is registered with the Georgia State Board of Registration for Professional Engineers and Land Surveyors/Georgia State Board of Registration for Professional Geologists and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances.</p> <p>Furthermore, to document my direct oversight of the Voluntary Remediation Plan development, implementation of corrective action, and long term monitoring, I have attached a monthly summary of hours invoiced and description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division.</p> <p>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."</p> <p>Michael J. Haller</p> <p>Printed Name and GA PEPG Number _____ Date April 6, 2018</p> <p>Signature and Stamp </p>	<p align="center">Certification Page</p>	



ADDITIONAL QUALIFYING PROPERTIES (COPY THIS PAGE AS NEEDED)

PROPERTY INFORMATION			
TAX PARCEL ID		PROPERTY SIZE (ACRES)	
PROPERTY ADDRESS			
CITY	COUNTY	ZIPCODE	
STATE		LONGITUDE (decimal format)	
LATITUDE (decimal format)			
PROPERTY OWNER INFORMATION			
PROPERTY OWNER(S)	PHONE #		
MAILING ADDRESS			
CITY	STATE/ZIPCODE		

PROPERTY INFORMATION			
TAX PARCEL ID		PROPERTY SIZE (ACRES)	
PROPERTY ADDRESS			
CITY	COUNTY	ZIPCODE	
STATE		LONGITUDE (decimal format)	
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TAX PARCEL ID		PROPERTY SIZE (ACRES)	
PROPERTY ADDRESS			
CITY	COUNTY	ZIPCODE	
STATE		LONGITUDE (decimal format)	
LATITUDE (decimal format)			
PROPERTY OWNER INFORMATION			
PROPERTY OWNER(S)	PHONE #		
MAILING ADDRESS			
CITY	STATE/ZIPCODE		

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1.0 INTRODUCTION

1.1 Objectives

The purpose of this Voluntary Investigation and Remediation Plan (VIRP) is to outline the steps necessary under the Georgia Voluntary Remediation Program (VRP) to investigate and remediate the American Amalgamated/Executive Cleaners HSI Site #10523 located at 3870 and 3880 Lawrenceville Highway in Lawrenceville, Gwinnett County, Georgia with Tax Parcel Identification Numbers R6131A023 (3870 parcel) and R6131A503 (3880 parcel).

1.2 Site Description and History

The 3870 Lawrenceville Highway property (3870 parcel) is located along the southeastern right of way (ROW) of Lawrenceville Highway (US Highway 29/Georgia Highway 8) in Lawrenceville, Gwinnett County, Georgia. The 3880 Lawrenceville Highway property (3880 parcel) is located at the eastern quadrant of the Lawrenceville Highway-Lester Road-Pleasant Hill Road intersection in Lawrenceville, Gwinnett County, Georgia. The 3870 Parcel of the Subject Properties is currently owned by Olympia Management, Inc. and the 3880 Parcel is currently owned by SW FARMS LLC. SW FARMS LLC purchased the 3880 parcel on September 5, 2017 from Frederick R. Parandi. A Site Plan showing the location of the Subject Properties is included as Figure 2 in Appendix 1. Copies of the warranty deeds and a tax map are included in Appendix 3.

1.2.1 3870 Parcel

Mr. David H. Freeman acquired an assemblage of tax parcels that became the 3870 parcel in 1981. EMMCO Gwinnett 29 acquired the assemblage in 1983 and developed the 3870 parcel with a shopping center named Pleasant Hill Market and Merchants Center that was completed in 1985. A dry cleaning facility operated in the westernmost tenant space of the shopping center since it opened. Executive Cleaners, the last dry cleaner that operated in the tenant space, closed in 2003. In October 2007, Georgia Department of Transportation (GDOT) acquired 0.736 acres from the 3870 parcel for a road widening project. The 3870 parcel changed hands several times until the current owner, Olympia Management Inc., acquired the 3870 Lawrenceville Highway parcel on March 1, 2016. Currently, the Executive Cleaners tenant suite is vacant. Before construction of the shopping center, the 3870 parcel was residential property.

The 3870 parcel is bordered to the north by the Lawrenceville Highway right of way (ROW) beyond which are commercial properties; to the east by the Valley Road NW ROW beyond which are residential properties; to the west by the 3880 parcel and the Lester Road NW ROW beyond which are commercial properties; and to the south by residential properties beyond which is the Sweetwater Road NW ROW.

1.2.2 3880 Parcel

Ray Moss Farms, Inc. acquired the 3880 parcel in 1977 and developed it with a single structure with two suites. The eastern suite was occupied by Golden Gallon, Inc. Store #80, a gasoline dispensing convenience store and the western suite was occupied by One Hour Martinizing, a

1994. In June 1994, Perimeter Oil Co. conveyed the 3880 parcel to the Parandi Family. The convenience store dispensed gasoline until September 9, 2009 and the dry cleaning facility operated until 2003. In April 2009, Georgia Department of Transportation (GDOT) acquired 0.133 acres from the 3880 parcel for a road widening project. The current owners, SW FARMS LLC, acquired the 3880 parcel from Frederick Parandi on September 5, 2017. Currently, the structure on the 3880 parcel is vacant. Before construction of the retail structures, the 3880 parcel was residential property.

The 3880 parcel is bordered to the north by the Lawrenceville Highway right of way (ROW) beyond which are commercial properties; to the east and south by the 3870 parcel; and to the west by the Lester Road NW ROW beyond which are commercial properties.

The site vicinity primarily contains commercial properties along the Lawrenceville Highway ROW followed by residential properties. A Site Plan showing the site features is included as Figure 2 in Appendix 1. The current legal descriptions for the properties and boundary surveys are included in Appendix 3.

1.3 Site Hydrogeology

The Subject Properties are located in the physiographic province known as the Piedmont, which extends from the Hudson River at the north to Alabama at the south. The Piedmont, the least mountainous portion of the Appalachian Highlands, is an area of intensely folded and faulted igneous and metamorphic rocks. The surface of the Piedmont can be described as a broadly undulating or rolling topography with low knobs or ridges, and valleys 30 to 300 feet thick. The underlying crystalline rocks of the Piedmont are the metamorphic schists, gneisses, quartzites and slates, and igneous granites and gabbros.

According to the *Physiographic Map of Georgia* (Clark and Zisa, 1976), the subject site is located in the Greenville Slope District. The Greenville Slope District is characterized by rolling topography that decreases gradually in elevation from 1,000 feet in the northeast to 600 feet in the southwest. All streams in the district eventually drain to the Gulf of Mexico. However, those flowing to the southwest occupy shallow, open valleys with broad rounded divides while those flowing to the southeast occupy narrower, deeper valleys with narrow, rounded divides. Relief varies from 150-200 feet in the east to 100-150 feet in the west. The southern boundary follows the base of Pine Mountain, which rises abruptly 250-400 feet above the adjacent surface. According to a Custom Soil Resource Report for Troup County Georgia acquired from the United States Department of Agriculture, National Resources Conservation Service website, the soils at the Subject Properties are identified as Urban land (Ub) and Riverview-Chewacla association. Urban lands are soils that have been so altered by the activities of Man that they no longer have the same physical properties as the nearby native soil associations. The Riverview-Chewacla association soils are well drained loams to sandy-loams from alluvial deposits with slopes of 0 to 2 percent.

Based upon a review of Georgia Geologic Survey – *Geologic Map of Georgia, 1976*, the bedrock underlying the site is described as hornblende gneiss/amphibolite (mm3) of the Piedmont Province.

Groundwater in the Piedmont is generally found in the shallow confined surficial aquifer, consisting of primary and secondary voids in the residuum and saprolite. Shallow unconfined water table conditions are present throughout the Piedmont physiographic province. Precipitation percolates through the residuum and saprolite until further vertical migration is impeded by the parent rock. In the Piedmont, the groundwater surface is generally a subdued reflection of surface topography. Recharge to the groundwater occurs from precipitation that averages approximately 51 inches per year within the LaGrange area. Rainfall occurs throughout the year, although increased amounts of rainfall are typical during the spring months. Soils within the area consist predominantly of sandy silts and silty sands that allow rapid percolation of rainfall. Typically, the infiltration of precipitation through the soil to the groundwater occurs within a few days after rainfall.

1.4 Regulatory Status

1.4.1 Underground Storage Tanks

The 3880 parcel is listed by Georgia Department of Natural Resources Environmental Protection Division (EPD) Underground Storage Tank Management Program (USTMP) as Shell Food Mart/Golden Gallon #80 (Facility ID: 670466), a closed underground storage tank (UST) facility. On September 6, 2017, SEA reviewed the USTMP files. Three 10,000-gallon gasoline tanks (Tanks #1 through #3) were installed on the 3880 parcel in 1977. Two confirmed releases were reported to USTMP. Release #1 was reported on March 23, 1994 and Release #2 was reported on June 1, 2010.

Release #1 was reported to USTMP in March 1994 with the submittal of an Initial Site Characterization Report (ISC) following the discovery of petroleum groundwater impacts during a due diligence investigation for a pending real estate transaction. Soil impacts were not identified during the investigation. A Corrective Action Plan (CAP) was submitted in March 1995 proposing a quarterly groundwater monitoring program and groundwater fate and transport modeling. Two years of semi-annual groundwater monitoring, conducted from June 1997 to December 1998, documented that BTEX concentrations were below In-Stream Water Quality Standards. “No Further Action Required” (NFAR) status was granted for Release #1 on February 15, 2000.

On September 14, 2009, following GDOT’s acquisition of a portion of the 3880 parcel, a GDOT contractor removed the UST system. A UST Closure Report was received by USTMP on June 1, 2010 that reported a confirmed release (Release #2) to the soil. In a letter dated September 9, 2010, USTMP requested a CAP-Part A (CAP-A). USTMP received a Closure Report Addendum on January 11, 2011 that reported petroleum groundwater impacts and the presence of over two feet of free product on the groundwater in MW-1. A CAP-A was received by USTMP on April 19, 2012 recommending a CAP-Part B and remediation. The CAP-A was approved on June 12, 2012. The last report received by USTMP was a Site Investigation Summary Report (SISR) dated November 13, 2012. The SISR documented that monitoring well MW-1R was installed with a 4-inch diameter casing to replace MW-1. A total of eleven monitoring wells associated with the petroleum investigation were installed on the 3880 parcel and were last sampled for the analysis of the volatile petroleum constituents benzene, toluene, ethylbenzene and xylenes (BTEX) in September 2012. All eleven wells detected concentrations

of benzene. On November 1, 2012, nearly three feet of free product was measured in MW-1R. The SISR recommended multi-phase extraction (MPE) as the remediation approach. The last correspondence from USTMP, dated November 30, 2012, approved the location of proposed well MW-13 only and requested four additional monitoring wells near the former tank pit and dispenser areas. This work was not completed and no further activities regarding the petroleum release have occurred on the 3880 parcel.

The petroleum soil and groundwater impacts including measureable free product detected during the 2009 UST tank removal activities through the 2012 investigation on the 3880 parcel are under the regulatory authority of the Georgia USTMP and are not the subject of this VIRP.

1.4.2 Hazardous Sites Inventory

A HSRA Release Notification (RN) submitted to EPD on October 31, 1997 by the owners of the 3870 parcel (Executive Cleaners) reported groundwater impacts of tetrachloroethene (PCE) and its degradation products trichloroethene (TCE), cis-1,2-dichloroethene (cDCE) and vinyl chloride (VC) in samples collected from monitoring wells located along the common boundary between the 3870 parcel and 3880 parcel. A RN for the 3880 parcel (One Hour Martinizing) was submitted to EPD on July 21, 1998 which reported soil and groundwater impacts from dry cleaning constituents near One Hour Martinizing and Executive Cleaners. Based on the data presented for both properties, EPD determined that both properties had a release and because their groundwater plumes are comingled both properties should be listed as one site. The 3870 parcel and 3880 parcel were listed as one site on the Hazardous Sites Inventory as the American Amalgamated/Executive Dry Cleaners HSI Site (HSI #10523) on February 11, 1999.

Until the owners of the two properties reached a settlement agreement in 2003, separate corrective action activities and Compliance Status Reports (CSRs) were submitted. An inclusive CAP/CSR Addendum for HSI #10523 was submitted for both properties on November 18, 2003. EPD approved the CAP portion of the report on June 22, 2005. The CAP portion of the CAP/CSR Addendum #2 for HSI #10523 was approved on January 20, 2012. HSI #10523 has been undergoing remedial measures including soil and groundwater sampling from 1999 through 2016.

SEA reviewed the most recent annual corrective action report (ACAR) for HSI #10523. The Eighth Annual Monitoring Report (ACAR #8) dated March 1, 2017, discussed groundwater monitoring of selected wells performed in September 2016, but no remedial activities occurred in 2016. The report proposed quarterly groundwater monitoring at wells with results above the RRS and additional injections based on the groundwater results. That report documented the historic data, the corrective action completed, and proposed future corrective action activities. Section 2.0 described the September 2016 groundwater sampling event and results on the Subject Properties. The results from that event were reviewed and used in the preparation of this VIRP. SEA also relied on the water levels reported and figures depicting the sample locations and on soil sampling data presented in this report and in previous reports.

In October 2017, a Prospective Purchaser Corrective Action Plan was submitted for both parcels that included additional investigation and, if necessary, additional remediation of soil impacts.

That plan also contemplated the installation of additional groundwater monitoring wells to establish current groundwater conditions.

1.5 Risk Reduction Standards

The risk reduction standards (RRS) under HSRA rules are based on property use and available site specific information. Types 1 and 2 RRS are residential or non-residential standards. Types 3 and 4 are applicable only to non-residential sites. Types 2 and 4 can be based on either site specific or default input factors. Type 5 RRS are applicable to either residential or non-residential use and can include engineering and/or institutional controls to minimize the risk of exposure.

The non-residential use standards for soil and groundwater were approved for the 3870 parcel and 3880 parcel in June 22, 2005 and are included as Table 4 in Appendix 2. The non-residential use standards for the 3870 parcel and/or the 3880 parcel may be re-calculated as part of the VRP process.

2.0 CONCEPTUAL SITE MODEL

2.1 Source Area

The suspected source of the soil and groundwater impacts at the Subject Properties are the former activities associated with the chlorinated solvent operation of both American Amalgamated and Executive Dry Cleaners dry cleaning facilities which operated from approximately 1985 to 2003 and 1977 to 2003, respectively. There are no regulatory reports of spills or release events in the records reviewed.

Based on the presence of both soil and groundwater impacts, the conceptual site model includes a release to soil which has migrated to the water table and resulted in both soil and groundwater impacts above the Type 3 risk reduction standard (RRS). Based on the concentrations recorded to date, it does not appear that DNAPL is present that would act as a source of groundwater impacts. It also appears, based on the decreasing trend for PCE, that ongoing leaching is not occurring. In May 2015, an excavation was performed at the Executive Cleaners suite that reduced the quantity of impacted soil that could act as a continuing source. The source of the cDCE and vinyl chloride groundwater impacts is the degradation of PCE and TCE. Figure 1 in Appendix 1 depicts a cross sectional and plan view of the Conceptual Site Model.

2.2 Contaminant Transport

The primary contaminant transport mechanisms at the Subject Properties are the potential for continued leaching from any remaining soil impacts, vapor off gassing from soil and groundwater impacts and advection and dispersion of contaminants through groundwater flow.

2.3 Potential Receptors

The potential human exposure routes associated with this release include direct exposure to impacted soil through construction work, primarily potential future underground utility work,

and potential vapor exposure to site occupants. No drinking water usage of groundwater in the immediate area has been identified. Surface water could be impacted by discharges from impacted groundwater, but it is anticipated that through mixing with unaffected surface water that the down gradient surface water will not exceed the in-stream water quality standards. Additional assessment of the potential for surface water impacts will be performed.

No ecological receptors have been identified.

2.4 Exposure Pathways

Based on the current assessment of the site, the complete exposure pathways include the potential inhalation of vapors from soil and groundwater. Direct exposure to soil is a possible complete exposure route, however, the only potential activity in the area of impacted soil is utility of potential construction worker exposure, if the Subject Properties were to be redeveloped. Incomplete routes include exposure to impacted groundwater. No impacted groundwater withdrawals are occurring.

3.0 PRELIMINARY REMEDIATION PLAN

3.1 Corrective Action Completed or in Process

Initially corrective action occurred voluntarily on the 3880 parcel with a dual-phase extraction (DPE) system that incorporated a single dual-phase extraction well, EW-1, that extracted and treated groundwater and soil vapors. The DPE system operated from October 1999 to May 2003. The remediation equipment building is located beside the dry cleaners suite at the rear of the convenience store suite.

The November 2003 CAP/CSR Addendum recommended SVE to treat the source area on the 3880 parcel by modifying the existing DPE system. Seven SVE wells were installed in and around the structure on the 3880 parcel. Also proposed was the use of chemical oxidation to treat groundwater and enhanced bioremediation injections to treat the soil and groundwater on the 3870 parcel and 3880 parcel. Periodic groundwater monitoring of selected monitoring wells to determine the effectiveness of the remedial measures was proposed. The SVE system located on the 3880 parcel operated from 2004 to 2009 and enhanced bioremediation injections for groundwater treatment on the 3870 parcel and 3880 parcel occurred periodically from 2004 to 2014. No further investigation on the 3880 parcel was conducted to determine the effectiveness of the SVE or bioremediation on the soil in the source area since the 2009 soil sampling event. Soil source removal inside and outside the building on the 3880 parcel was proposed for 2015 in ACAR #6, but was never conducted.

Soil source removal was conducted in May 2015 inside the former Executive Cleaners suite on the 3870 parcel. The depth, extent and location of the excavation was based on the results of shallow soil samples collected in 1998 and the groundwater impact in nearby monitoring wells. During the source removal, the upper six feet of soil removed from the excavation and stockpiled. The soil from 6 to 12 feet below the surface was removed from the excavation and placed into a roll-off box for disposal as non-hazardous waste at an approved landfill. Based on the reported groundwater elevations in nearby monitoring wells, the soils removed for disposal

were from depths at or below the water table. Concentrations detected in the soil confirmation samples collected at or below the water table identified soil impact exceeding the site specific non-residential RRS. The enhanced bioremediation product used on the 3870 parcel to treat groundwater impacts was placed in the bottom of the excavation prior to backfilling. No further investigation was conducted to determine the effectiveness of the source removal or enhanced bioremediation.

3.2 Additional Corrective Action Measures

The proposed corrective action includes the collection of soil samples on the 3870 parcel and the 3880 parcel to determine the effectiveness of earlier remedies discussed above in Section 3.1. Any soil impacts above appropriate non-residential RRS discovered will be remediated, and the methods of remediation may include, without limitation, in situ chemical oxidation or direct excavation with off-site disposal. In the event of excavation, excavated material that requires off-site disposal will be placed directly in roll-off boxes or dump trucks, or placed on pavement with appropriate cover and erosion control. Any such work will be performed in accordance with applicable regulations, and in accordance with a site specific Health and Safety Plan and OSHA standards. Any excavation, handling, transportation, and disposal of the material will be performed in a manner designed to prevent contamination of the surrounding unaffected areas in accordance with federal, state, and local laws, and that is protective of personnel in the excavation area and adjacent areas.

As part of the corrective action, additional site characterization including the collection of soil and groundwater samples for laboratory analysis and an evaluation of the potential for vapor intrusion from any remaining groundwater impacts will be performed. Additional soil samples will be collected in order to demonstrate that soils are in compliance with the RRS. Additional groundwater monitoring wells will be installed on the western portion of Tract I and sampled to more accurately demonstrate the direction of groundwater flow and establish a baseline of potential contamination that is flowing on to or off the Subject Properties.

SEA anticipates that, in addition to the possible direct measures to reduce the contaminant concentrations, engineering and/or institutional controls may be used to minimize the potential for exposure. The institutional controls may include a Uniform Environmental Covenant designed to be protective of human health and the environment, and may include activity and/or use limitations.

4.0 MILESTONE SCHEDULE:

The following milestone schedule outlines significant events as discussed above including historic and anticipated future events. The dates of future events may be accelerated based on the progress of the remedial measures taken. A Gantt chart of the following milestone schedule is included in Appendix 4.

Phase II Investigation by Dames and Moore	September 1997
Release Notification	October 31, 1997
CAP/CSR Addendum including both parcels	November 18, 2003
EPD approved the CAP portion of the report	June 22, 2005
CAP/CSR Addendum #2	September 26, 2011
CAP portion of the CAP/CSR Addendum #2 approved	January 20, 2012

Annual Monitoring Reports
VRP Application and VIRP submittal
Additional Remedial Measures
VRP Semi-Annual Reports
On site horizontal delineation
Off-site horizontal delineation
Vertical Delineation
VRP Compliance Status Report

May 2006 through March 2017
April 6, 2018
As warranted
October 2018 until October 2022
April 2019
April 2020
October 2020
April 2023

APPENDICES

APPENDIX 1

FIGURES

Figure 1: Conceptual Site Model

Figure 2: Site Plan

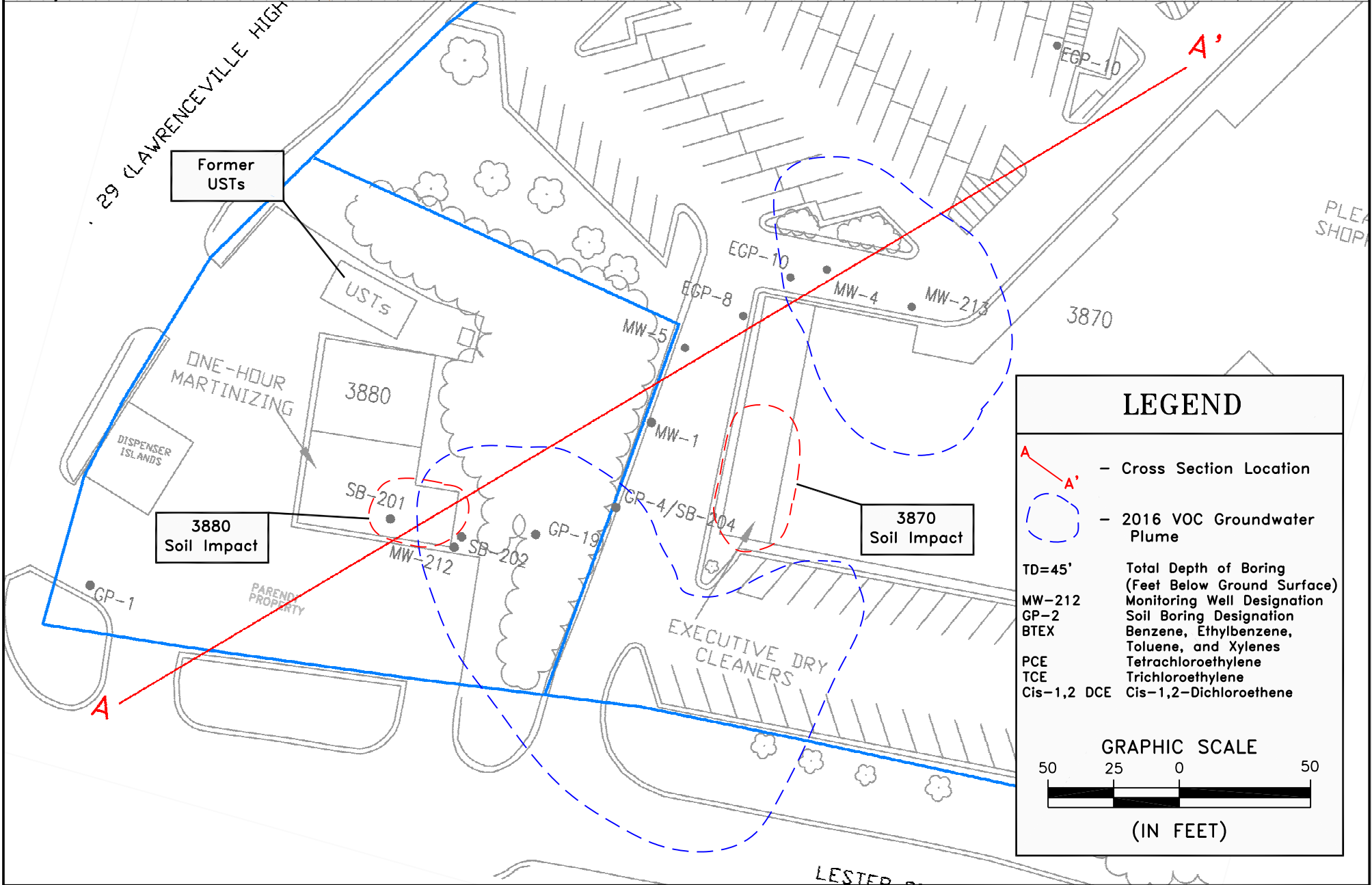
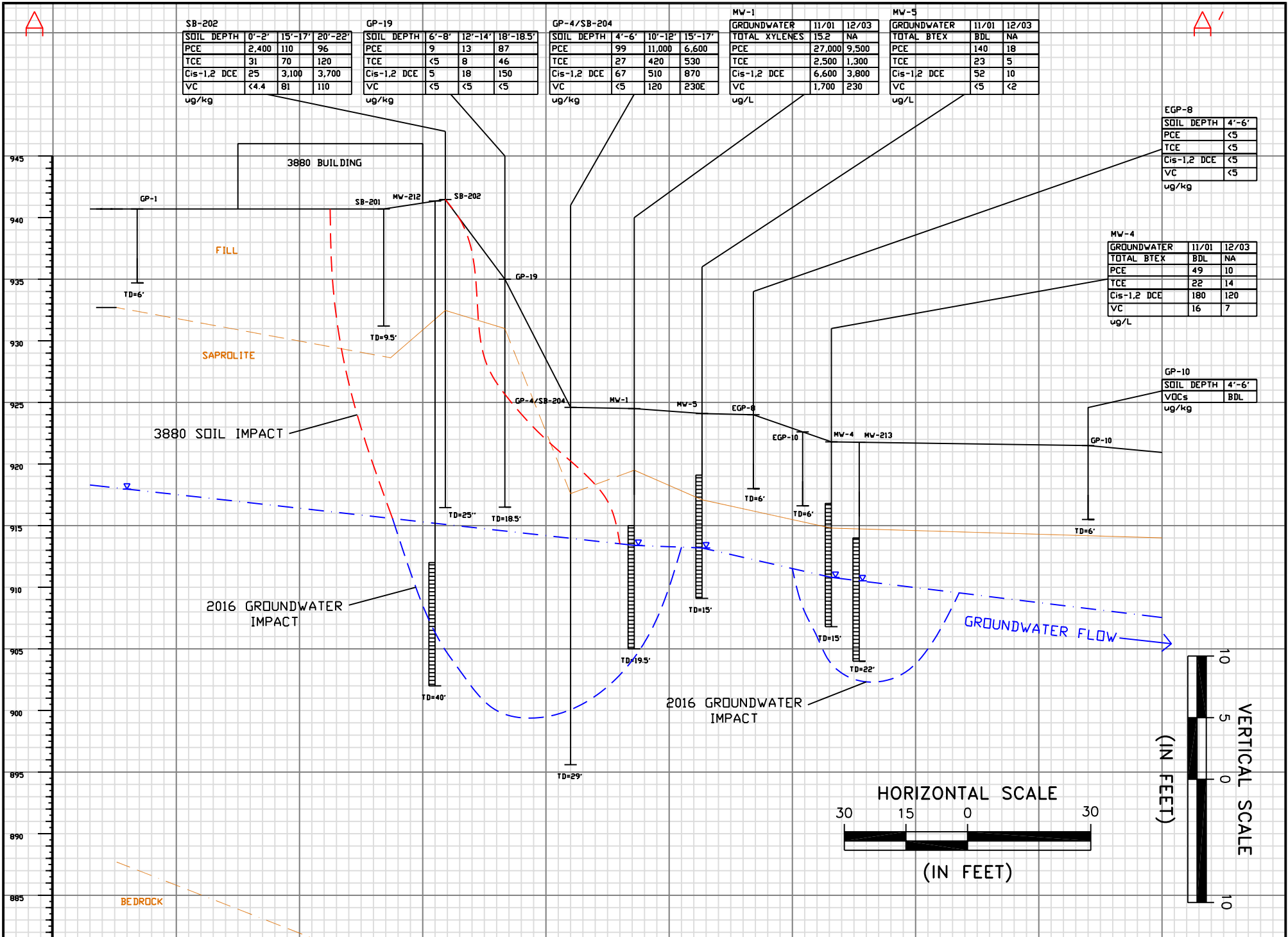
Figure 3: Soil Impact Summary - 3870 Parcel

Figure 4: Soil Impact Summary - 3880 Parcel

Figure 5: Groundwater Monitoring Well Location Plan

Figure 6: Groundwater Impact Summary, September 2016

Figure 7: Potentiometric Surface Map, September 2016



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CONCEPTUAL SITE MODEL FIGURE 1

3870 & 3880 LAWRENCEVILLE HIGHWAY PROPERTY

3870 & 3880 Lawrenceville Highway
Lawrenceville, Gwinnett County, Georgia

Job No. 172-090



Data Source: 2017 aerial photography courtesy of Google Earth

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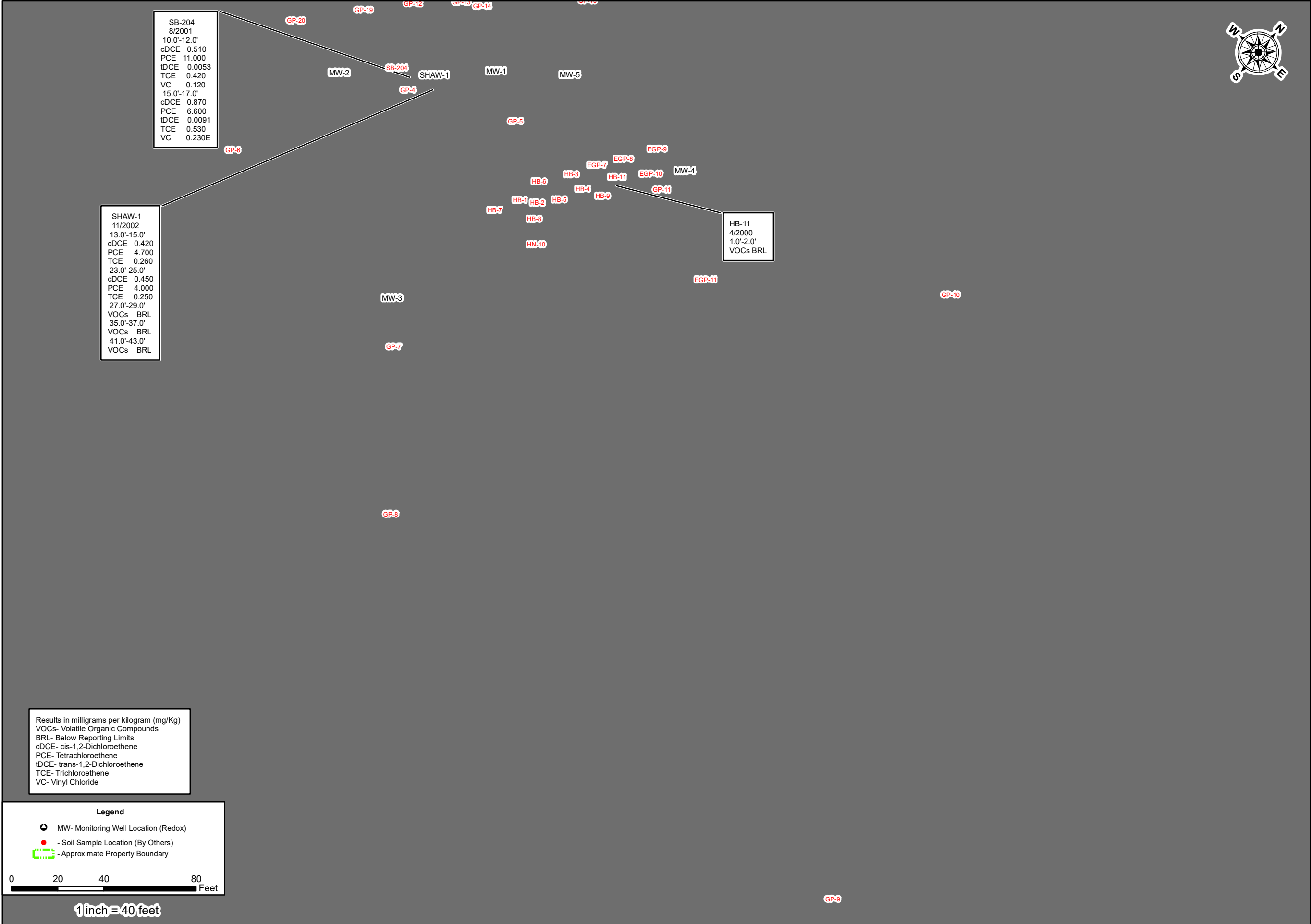
SITE PLAN FIGURE 2

3870 & 3880 LAWRENCEVILLE HIGHWAY PROPERTY

3870 & 3880 Lawrenceville Highway
Lawrenceville, Gwinnett County, Georgia
HS# 10528

Job No. 172-090

4/2/2018



3880 LAWRENCEVILLE HIGHWAY PROPERTY

3880 Lawrenceville Highway
Lawrenceville, Gwinnett County, Georgia

4/2/2018


Job No. 172-090


3870 PARCEL
SOIL IMPACT SUMMARY
FIGURE 3

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Legend

 MW- Monitoring Well Location (Redox Tech)

 - Approximate Property Boundary

0153060

Feet

1inch = 40 feet

Data Source: Plan courtesy of Redox Tech, LLC

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MONITORING WELL
LOCATION PLAN
FIGURE 5

3870 & 3880 LAWRENCEVILLE HIGHWAY PROPERTY

3870 & 3880 Lawrenceville Highway
Lawrenceville, Gwinnett County, Georgia

Job No. 172-090



Data Source: Plan courtesy of Redox Tech, LLC

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**GROUNDWATER
IMPACT SUMMARY
SEPTEMBER 2016
FIGURE 6**

3870 & 3880 LAWRENCEVILLE HIGHWAY PROPERTY

3870 & 3880 Lawrenceville Highway
Lawrenceville, Gwinnett County, Georgia

Job No. 172-090

4/3/2018



Data Source: Plan courtesy of Redox Tech, LLC

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POTENTIOMETRIC
SURFACE MAP
SEPTEMBER 2016
FIGURE 7

3870 & 3880 LAWRENCEVILLE HIGHWAY PROPERTY

3870 & 3880 Lawrenceville Highway
Lawrenceville, Gwinnett County, Georgia

Job No. 172-090

4/9/2018

APPENDIX 2

TABLES

Table 1: Soil Laboratory Results Summary

Table 2: Groundwater Laboratory Results Summary - September 2016

Table 3: Groundwater Elevation Summary - September 2016

Table 4: Approved Type 3 and Type 4 Risk Reduction Standards - June 22, 2005

TABLE 1

3070 and 3080 Lawrenceville Hwy. Property
Lawrenceville, Gwinnett County, Georgia
HSI No. 10523
SEA Job #172-090

Soil Laboratory Results Summary

Sample ID	Depth	Date	1,1-Dichloroethene	cis-1,2-Dichloroethene	Tetrachloroethene	trans-1,2-Dichloroethene	Trichloroethene	Vinyl Chloride
	(ft)		(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
3870 Parcel								
MW-1	5-7	Aug-97		<0.005	<0.005		<0.005	<0.010
MW-2	5-7	Aug-97		<0.005	<0.005		<0.005	<0.010
MW-3	5-10	Aug-97		<0.005	<0.005		<0.005	<0.010
GP-4	4-6	Apr-98		0.067	0.099		0.027	<0.005
GP-5	4-6	Apr-98		<0.005	0.009		<0.005	<0.005
GP-6	4-6	Apr-98		<0.005	<0.005		<0.005	<0.005
GP-7	4-6	Apr-98		<0.005	<0.005		<0.005	<0.005
GP-8	4-6	Apr-98		<0.005	<0.005		<0.005	<0.005
GP-9	4-6	Apr-98		<0.005	<0.005		<0.005	<0.005
GP-10	4-6	Apr-98		<0.005	<0.005		<0.005	<0.005
GP-11	4-6	Apr-98		<0.005	<0.005		<0.005	<0.005
MW-4	3-5	Jun-98		<0.002	0.0036		<0.002	<0.002
MW-5	3-5	Jun-98		<0.002	<0.002		<0.002	<0.002
EGP-7	4-6	Nov-98		<0.002	<0.002		<0.002	<0.002
EGP-8	4-6	Nov-98		<0.002	<0.002		<0.002	<0.002
EGP-9	4-6	Nov-98		<0.002	<0.002		<0.002	<0.002
EGP-10	4-6	Nov-98		<0.002	<0.002		<0.002	<0.002
EGP-11	4-6	Nov-98		0.0027	<0.002		<0.002	<0.002
HB-1	3-4	Nov-98		<0.002	0.0194		<0.002	<0.002
HB-1	3-4	Nov-98		<0.002	0.014		<0.002	<0.010
HB-2	4-6	Nov-98		<0.002	0.1965		<0.002	<0.002
HB-2	4-6	Nov-98		<0.002	0.060		<0.002	<0.010
HB-3	4-6	Nov-98		<0.100	<0.100		<0.100	<0.100
HB-3	4-6	Nov-98		<0.005	0.029		<0.005	<0.010
HB-4	4-6	Nov-98		<0.100	<0.100		<0.100	<0.100
HB-4	4-6	Nov-98		<0.005	<0.005		<0.005	<0.010
HB-5	1-2	Apr-00	<0.0059	<0.0059	0.0110	<0.0059	<0.0059	<0.012
HB-5	3-4	Apr-00	<0.0071	<0.0071	0.0550	<0.0071	<0.0071	<0.014
HB-5	4.5-5.5	Apr-00	<0.006	<0.006	0.0081	<0.006	<0.006	<0.012
HB-6	1-2	Apr-00	<0.0059	<0.0059	<0.0059	<0.0059	<0.0059	<0.012
HB-7	1-2	Apr-00	<0.0058	<0.0058	<0.0058	<0.0058	<0.0058	<0.012
HB-8	1-2	Apr-00	<0.0071	<0.0071	0.014	<0.0071	<0.0071	<0.014
HB-9	1-2	Apr-00	<0.0055	<0.0055	0.010	<0.0055	<0.0055	<0.011
HB-10	1-2	Apr-00	<0.0063	<0.0063	0.033	<0.0063	<0.0063	<0.013
HB-11	1-2	Apr-00	<0.006	<0.006	<0.006	<0.006	<0.006	<0.012
SB-204*	10-12	Oct-01	<0.0041	0.510	11.000	0.0053	0.420	0.120
*	15-17	Oct-01	<0.0046	0.870	6.600	0.0091	0.530	0.230E
SHAW-1*	13-15	Nov-02		0.420	4.700		0.260	<0.220
*	23-25	Nov-02		0.450	4.000		0.250	<0.0045
*	27-29	Nov-02		<0.0046	<0.0046		<0.0046	<0.200
*	35-37	Nov-02		<0.0047	<0.0047		<0.0047	<0.0047
*	41-43	Nov-02		<0.0043	<0.0043		<0.0043	<0.0043
3880 Parcel								
GP-1	4-6	Apr-98		<0.005	<0.005		<0.005	<0.005
GP-2	4-6	Apr-98		<0.005	<0.005		<0.005	<0.005
GP-3	4-6	Apr-98		<0.046	2.100		<0.046	<0.046
GP-12	4-6	Apr-98		<0.005	<0.005		<0.005	<0.005
GP-13	4-6	Apr-98		0.056	0.0124		0.006	<0.002
GP-14	6-6.5	Aug-98		0.069	0.095		0.023	<0.005
*	12-12.5	Aug-98		0.066	1.100		0.020	<0.005
*	18-18.5	Aug-98		0.046	2.800		0.029	<0.005
GP-15	6-6.5	Aug-98		<0.005	<0.005		<0.005	<0.005
*	12-12.5	Aug-98		<0.005	<0.005		<0.005	<0.005
GP-16	6-6.65	Aug-98		<0.005	<0.005		<0.005	<0.005
	18-18.5	Aug-98		<0.005	<0.005		<0.005	<0.005
	20-20.5	Aug-98		<0.005	<0.005		<0.005	<0.005
GP-17	6-6.5	Aug-98		<0.005	0.041		<0.005	<0.005
	15-18.5	Aug-98		0.056	<0.005		0.013	0.010
*	22-22.5	Aug-98		0.006	<0.005		<0.005	<0.005
GP-18	6-6.5	Aug-98		0.082	1.300		0.067	<0.005
	18-18.5	Aug-98		3.300	0.110		0.110	0.090
*	26-28	Aug-98		0.860	0.097		0.063	0.025
GP-19	6-8	Aug-98		0.005	0.009		<0.005	<0.005
	12-14	Aug-98		0.018	0.013		0.008	<0.005
*	18-18.5	Aug-98		0.150	0.087		0.046	<0.005
GP-20	6-6.5	Aug-98		<0.005	<0.005		<0.005	<0.005
	8-8.5	Aug-98		<0.005	<0.005		<0.005	<0.005
*	18-18.5	Aug-98		<0.005	<0.005		<0.005	<0.005
SB-1	12-15	Feb-00		2.100	0.230		0.280	0.015
	18-20	Feb-00		3.700	0.320		0.400	0.014
SB-200 (SVE)	0-2	Oct-01	<0.0039	0.260E	350.000	0.015	0.780	0.045
	5-10	Oct-01	0.013	4.300	930.000	0.170	21.000	0.840
	12-14	Oct-01	<0.0040	33.000	5.700	0.690	7.300	5.300
SB-201	0-2	Oct-01	<0.0043	0.082	3.400	<0.0043	0.120	<0.0043
	8-9.5	Oct-01	<0.0044	7.300	3.300	0.270	0.410	1.900
SB-202	0-2	Oct-01	<0.0044	0.025	2.400	<0.0044	0.031	<0.0044
	15-17	Oct-01	<0.0044	3.100	0.110	0.050	0.070	0.081
	20-22	Oct-01	<0.0039	3.700	0.096	0.072	0.120	0.110
November 2003 Residential Type 3 Risk Reduction Standard			0.700	0.530	0.500		0.500	0.200
November 2003 Residential Type 4 Risk Reduction Standard			28.000	18.900	0.936	N/A	0.356	0.145

Notes:

* Denotes soil sample was collected at or below the water table

mg/Kg = milligrams per kilogram

Highlighted results = exceeds higher of 2003 Type 3 or 2003 Type 4 RRS

TABLE 1

3070 and 3080 Lawrenceville Hwy. Property
Lawrenceville, Gwinnett County, Georgia
HSI No. 10523
SEA Job #172-090

Soil Laboratory Results Summary

Sample ID	Depth	Date	1,1-Dichloroethene	cis-1,2-Dichloroethene	Tetrachloroethene	trans-1,2-Dichloroethene	Trichloroethene	Vinyl Chloride
	(ft)		(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
3880 Parcel (Cont'd)								
SB-203	0-2	Oct-01	<0.0043	0.0084	0.0059	<0.0043	<0.0043	<0.0043
	10-12	Oct-01	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
	20-22	Oct-01	<0.0036	<0.0036	0.300E	<0.0036	0.0045	<0.0036
SB-300	0-2	Apr-04	<0.120	<0.120	<0.120	<0.120	<0.120	<0.120
	8-10	Apr-04	<0.120	<0.150	<0.120	<0.120	<0.120	<0.120
	15-17	Apr-04	<0.120	0.160	<0.120	<0.120	<0.120	<0.120
SB-301	0-2	Apr-04	<0.0062	<0.0062	0.080	<0.0062	<0.0062	<0.0062
	8-10	Apr-04	<0.120	<0.120	<0.120	<0.120	<0.120	<0.120
	15-17	Apr-04	<0.120	<0.120	<0.120	<0.120	<0.120	<0.120
SB-302 (SVE)	0-2	Apr-04	<0.120	<0.120	1.700	<0.120	<0.120	<0.120
SB-303	0-2	Apr-04	0.<110	<110	0.230	<0.110	<0.110	<0.110
	8-10	Apr-04	<0.0062	0.720	0.015	0.120	0.110	0.440J
	15-17	Apr-04	<0.0062	0.490	0.740J	0.058	0.860J	0.081
SB-304 (SVE)	0-2	Apr-04	<0.120	<0.120	0.180	<0.120	<0.120	<0.120
	8-10	Apr-04	0.007	3.100	<0.0062	0.590	0.011	0.220J
	15-17	Apr-04	<0.0062	2.300J	0.067	<0.150	0.440J	0.600J
SB-305 (SVE)	0-2	May-04	<0.310	<0.310	1.000	<0.310	<0.310	<0.120
	8-10	May-04	<0.310	<0.310	480.000	<0.310	4.300	<0.130
	15-17	May-04	<0.300	11.000	5.800	<0.300	6.600	1.400
	20-22	May-04	<0.290	3.600	7.800	<0.290	6.000	0.140
SB-306 (SVE)	0-2	May-04	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062
	8-10	May-04	<0.320	<0.320	1.100	<0.320	<0.320	<0.130
	15-17	May-04	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062	<0.0062
SB-307	0-2	May-04	<0.0062	<0.0062	0.065	<0.0062	0.007	<0.0062
	8-10	May-04	<0.0062	0.034	0.210	<0.0062	<0.0062	0.009
	15-17	May-04	<0.0062	0.009	<0.0062	<0.0062	<0.0062	<0.0062
SB-308	0-2	May-04	<0.310	<0.310	0.330	<0.310	0.160	<0.130
	8-10	May-04	<0.0062	0.410J	<0.0062	0.018	<0.0062	<0.0062
	15-17	May-04	<0.310	0.640	<0.310	<0.310	<0.310	<0.130
SB-309	0-2	May-04	<0.290	<0.290	0.270	<0.290	0.170	<0.120
	8-10	May-04	<0.0062	0.046	<0.0062	0.005	<0.0062	0.150J
	15-17	May-04	<0.300	11.000	<0.300	0.300	0.300	0.390
	20-22	May-04	<0.300	16.000	0.140	0.330	0.870	0.650
SS-1 (SVE)	8-10	Mar-05	<0.0062	0.007	0.045	<0.0062	0.046	<0.0062
	15-17	Mar-05	<0.0062	0.800	1.300	0.019	2.100	0.016
SS-2 (SVE)	9.25-11.5	Mar-05	<0.0062	<0.0062	<0.0062	<0.0062	<6.2	<0.0062
	15-17	Mar-05	<0.0062	<0.0062	<0.0062	<0.0062	<6.2	<0.0062
SS-1	10-12	Oct-09	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039	<0.0039
SS-2 (no lab data)	9.25-11.5	Oct-09	ND	ND	ND	ND	ND	ND
November 2003 Residential Type 3 Risk Reduction Standard			0.700	0.530	0.500		0.500	0.200
November 2003 Residential Type 4 Risk Reduction Standard			28.000	18.900	0.936	N/A	0.356	0.145

Notes:

* Denotes soil sample was collected at or below the water table

mg/Kg = milligrams per kilogram

Highlighted results = exceeds higher of 2003 Type 3 or 2003 Type 4 RRS

TABLE 2

**3070 and 3080 Lawrenceville Hwy. Property
Lawrenceville, Gwinnett County, Georgia
HSI No. 10523
SEA Job #172-090**

Grounwater Laboratory Results Summary - September 2016

Sample ID	Date	cis-1,2-Dichloroethene (mg/L)	Tetrachloroethene (mg/L)	trans-1,2-Dichloroethene (mg/L)	Trichloroethene (mg/L)	Vinyl Chloride (mg/L)
MW-1	Sep-16	<0.005	<0.005	<0.005	<0.005	0.005
MW-2	Sep-16	0.048	<0.005	<0.005	<0.005	<0.002
MW-3	Sep-16	0.029	<0.005	<0.005	<0.005	<0.002
MW-4	Sep-16	0.170	<0.005	<0.005	<0.005	0.110
MW-5	Sep-16	0.005	<0.005	<0.005	<0.005	0.006
MW-6	Sep-16	0.011	<0.005	<0.005	<0.005	0.006
MW-7	Sep-16	<0.005	<0.005	<0.005	<0.005	<0.002
MW-106S	Sep-16	0.050	<0.005	0.006	<0.005	0.052
MW-106D	Sep-16	<0.005	<0.005	<0.005	<0.005	<0.002
MW-207S	Sep-16	0.110	<0.005	<0.005	<0.005	0.002
MW-207I	Sep-16	<0.005	<0.005	<0.005	<0.005	<0.002
MW-212	Sep-16	0.430	<0.005	0.011	<0.005	0.260
MW-213	Sep-16	2.500	<0.005	0.028	<0.005	0.280
SHAW-1	Sep-16	<0.005	<0.005	<0.005	<0.005	<0.002

Notes:

Bold Sample IDs = Included in Annual Groundwater Monitoring since February 8, 2012 CAP rev #3

mg/L = milligrams per liter

N/A = Not Applicable

TABLE 3

3070 and 3080 Lawrenceville Hwy. Property
Lawrenceville, Gwinnett County, Georgia
HSI No. 10523
SEA Job #172-090

Grounwater Elevation Summary - September 2016

Sample ID	Date	TOC Elevation (feet msl)	Depth to Water (feet)	Groundwater Elevation (feet msl)
MW-1	Sep-16	924.21	7.67	916.54
MW-2	Sep-16	925.66	9.42	916.24
MW-3	Sep-16	922.36	7.54	914.82
MW-4	Sep-16	921.65	7.98	913.67
MW-5	Sep-16	923.82	7.88	915.94
MW-6	Sep-16	923.34	7.25	916.09
MW-7	Sep-16	922.07	7.15	914.92
MW-103D		934.95		
MW-106S	Sep-16	Not Reported	14.44	NA
MW-106D	Sep-16	Not Reported	13.24	NA
MW-203S		917.97	Not Measured	
MW-203I		917.94	Not Measured	
MW-203D		917.98	Not Measured	
MW-204S		915.13	Not Measured	
MW-204I		915.35	Not Measured	
MW-204D		Not Reported	Not Measured	
MW-205S		917.43	Not Measured	
MW-205I		917.12	Not Measured	
MW-206S		928.66	Not Measured	
MW-206I		929.11	Not Measured	
MW-206D		929.51	Not Measured	
MW-207S*	Sep-16	910.06	17.43	892.63
MW-207I	Sep-16	930.05	18.28	911.77
MW-208S (off-site)		933.99	Not Measured	
MW-208I (off-site)		933.76	Not Measured	
MW-209		Not Reported	Not Measured	
MW-210		Not Reported	Not Measured	
MW-211		Not Reported	Not Measured	
MW-212	Sep-16	Not Reported	22.34	NA
MW-213	Sep-16	Not Reported	8.39	NA
MW-214		Not Reported	Not Measured	
SHAW-1	Sep-16	924.03	9.31	914.72

Notes:

Bold Sample IDs = Included in Annual Groundwater Monitoring since February 8, 2012 CAP rev #3
 Top of casing elevations surveyed by DLM Civil Engineering & Land Surveying, December 2003

TABLE 4
3070 and 3080 Lawrenceville Hwy. Property
Lawrenceville, Gwinnett County, Georgia
HSI No. 10523
SEA Job #172-090

Approved Type 3 & Type 4 RRS, June 22, 2005

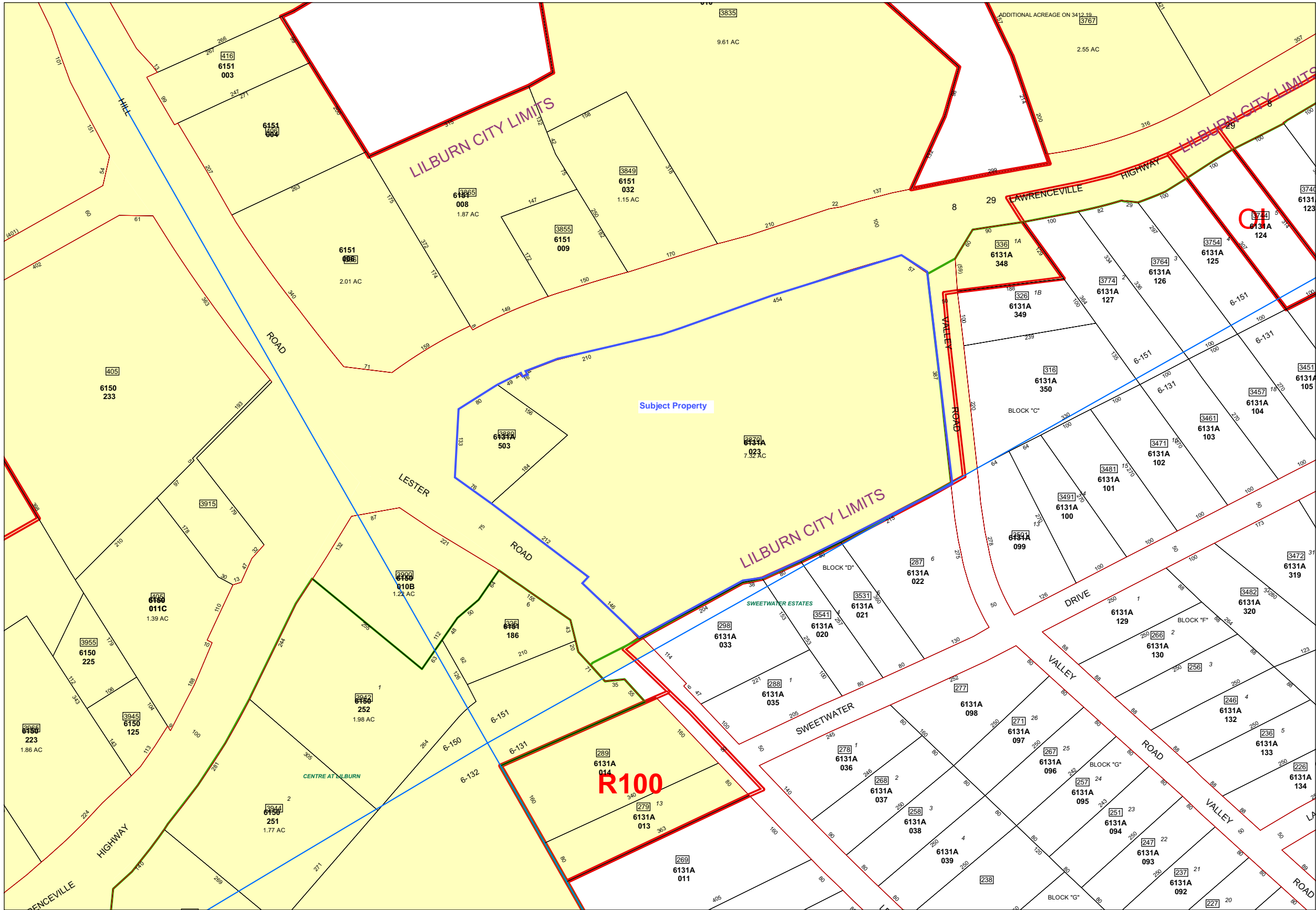
CAS No.	Chemical	Soil			
		Type 3		Type 4	
		Surface	>2 feet	Surface	>2 feet
		(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
71432	Benzene	0.500	0.500	1.320	1.320
107062	1,2-DCA	0.500	0.500	0.181	0.181
75354	1,1-DCE	0.700	0.700	28.000	28.000
156592	cDCE	0.530	0.530	18.900	18.900
100414	Ethylbenzene	70.000	70.000	562.000	562.000
127184	PCE	0.500	0.500	0.936	0.936
29016	TCE	0.500	0.500	0.356	0.356
75014	VC	0.200	0.200	0.145	0.145

mg/kg = milligrams per kilogram

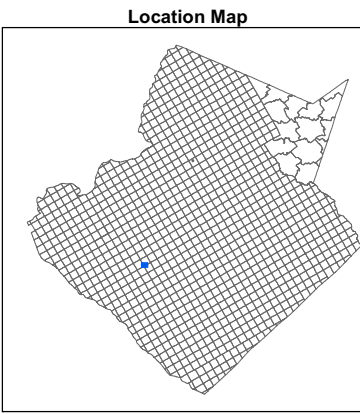
mg/L = milligrams per liter

APPENDIX 3

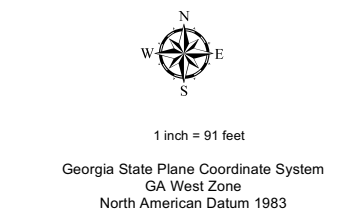
LEGAL DESCRIPTION AND BOUNDARY SURVEY



GWINNETT COUNTY,
GEORGIA
PROPERTY MAP
District - Landlot



- Legend**
- Parcel Boundary
 - Other Boundary Line
 - Parcel Boundary Line
 - Disputed Boundary Line
 - Hydro Boundary Line
 - ROW Boundary Line
 - Railroad ROW Boundary Line
 - Subdivisions
 - Zoning
 - Private Easement
 - City Limits
 - County Boundary
 - Ownership Hook
 - LandLot
 - Georgia Militia District



Disclaimer:
This map is a graphical representation of data obtained from aerial photography, recorded deeds, plats, engineering drawings and other public records and data. Gwinnett County does not warrant the accuracy or currency of the data it has provided and does not guarantee the suitability of the data for any purpose, expressed or implied. ALL DATA IS PROVIDED AS IS, WITH ALL FAULTS, WITHOUT WARRANTY OF ANY KIND, EITHER EXPRESS OR IMPLIED, INCLUDING, BUT NOT LIMITED TO, THE IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. This map is the proprietary product of Gwinnett County and in no event will Gwinnett County be liable for damages, including any loss of profits, lost savings, or other incidental or consequential damages arising out of the use of or inability to use this map.

Map Produced by Gwinnett County GIS
Department of Information Technology Services
Map Printed:

3870 PARCEL LEGAL DESCRIPTIONS

Type: DEED Book: 54129 Page: 00577

BK54129 PG0577

EXHIBIT "A"**Legal Description**

All that tract or parcel of land lying and being in Land Lot 131 and 151 of the 6th District of Gwinnett County, Georgia containing 8.048 acres as shown on that certain plat of survey prepared of Pleasant Hill Market and Merchants Center, by SCI Development Services, dated May 27, 2003, last revised 03/27/2006, and being more particularly described as follows:

Beginning at an iron pin located at the southeasterly terminus of a mitered intersection formed by the southerly right-of-way of Lawrenceville Highway (a/k/a US 29) (100 foot right-of-way) and the westerly right-of-way of Valley Road (60 foot right-of-way) (said iron pin also being South 5° 54' 20" East a distance of 63.03 from the centerline of Lawrenceville Highway); run thence South 5° 24' 20" East along the westerly right-of-way line of Valley Road a distance of 427.16 feet to an iron pin set, thence leaving said right-of-way run South 63° 33' 00" West a distance of 375.40 feet to an iron pin set; thence South 84° 21' 13" West a distance of 38.13 feet to an iron pin set; thence South 61° 1' 33" West a distance of 193.12 feet to an iron pin set on the northeasterly right-of-way of Lester Road (having a 100 foot right-of-way); run thence along said right-of-way following an arc of a curve to the left an arc distance of 322.61 feet (said arc being subtended by a chord bearing North 48° 46' 58" West a chord distance of 321.97 feet and said arc having a radius of 1482.42 feet) to an iron pin; thence continue along said right-of-way North 54° 49' 21" West a distance of 41.76 feet to an iron pin set; thence leaving said right-of-way North 48° 28' 15" East a distance of 184.13 feet to an iron pin set, thence North 53° 25' 52" West 160.07 feet to an iron pin set on the southerly right-of-way of Lawrenceville Highway, thence along said right-of-way North 67° 26' 43" East at a distance of 49.20 feet to a point, thence South 22° 33' 17" East a distance of 4.00 feet to a point; thence continue along said right-of-way North 67° 26' 43" East a distance of 10.00 feet to a point; thence North 22° 33' 17" West a distance of 4.00 feet to a point, thence continue along said right-of-way North 67° 26' 43" East a distance of 28.53 feet to a point, thence North 71° 47' 47" East a distance of 550.49 feet to a point; thence continue along said right-of-way following an arc of a curve an arc distance of 13.56 feet (said arc being subtended by a chord bearing North 71° 56' 29" East a chord distance of 13.56 feet and said arc having a radius of 1382.30 feet); thence continue along said right-of-way South 17° 20' 55" East at a distance of 4.00 feet, thence North 72° 39' 05" East a distance of 10.00 feet; thence North 17° 20' 55" West a distance of 4.00 feet, thence continuing along said right-of-way along an arc of a curve an arc distance of 129.48 feet (said arc being subtended by a chord bearing North 75° 25' 07" East a chord distance of 129.43 feet and said arc having a radius of 1382.30 feet) to an iron pin set at the northwesterly terminus of the mitered intersection formed by the southerly right-of-way of Lawrenceville Highway and westerly by right-of-way Valley Road; thence along said mitered intersection South 56° 15' 17" East a distance of 17.36 feet to an iron pin at the point of true beginning.

Less and except those certain tracts and parcels of land conveyed by Grantor to the Georgia Department of Transportation by virtue of that certain Right of Way Deed dated October 5, 2007 and recorded at Deed Book 48363, Page 223, in the records of the office of the Superior Court Clerk of Gwinnett County, Georgia and released by Holder from the Security Deed by virtue of that certain Quit-Claim Deed dated October 19, 2007 and recorded at Deed Book 48372, Page 298, aforesaid records.

48363
00226

BK 4 8 3 6 3 PG 0 2 2 6

EXHIBIT "A"

PROJECT NO.:	STP-0000-00 (844)	Gwinnett County
P. I. NO.:	0000844	
PARCEL NO.:	28 (Tract 2)	
DATE OF R/W PLANS:	July 21, 2004	
REVISION DATE:	May 23, 2007	Page 2 of 5

All that tract or parcel of land lying and being in Land Lot 131 of the 6th Land District of Gwinnett County, Georgia, being more particularly described as follows:

Beginning at a point 45.31 feet right of and opposite Station 167+55.78 on the construction centerline of US 29/ SR 8 on Georgia Highway Project No. STP-0000-00 (844); running thence N 67°13'48.7" E a distance of 28.76 feet to a point 43.82 feet right of and opposite station 167+86.26 on said construction centerline laid out for SR 8 / US 29; thence N 71°34'56.5" E a distance of 539.31 feet to a point 43.45 feet right of and opposite station 173+25.81 on said construction centerline laid out for SR 8 / US 29; thence northeasterly 23.508 feet along the arc of a curve (said curve having a radius of 1718.986 feet and a chord distance of 23.508 feet on a bearing of N 71°58'26.9" E) to the point 43.48 feet right of and opposite station 173+49.84 on said construction centerline laid out for SR 8 / US 29; thence S 17°38'02.8" E a distance of 10.00 feet to a point 53.48 feet right of and opposite station 173+49.83 on said construction centerline laid out for SR 8 / US 29; thence N 72°31'42.4" E a distance of 9.69 feet to a point 53.49 feet right of and opposite station 173+59.82 on said construction centerline laid out for SR 8 / US 29; thence N 17°18'32.8" W a distance of 10.00 feet to a point 43.49 feet right of and opposite station 173+59.83 on said construction centerline laid out for SR 8 / US 29; thence northeasterly 128.031 feet along the arc of a curve (said curve having a radius of 1718.986 feet and a chord distance of 128.002 feet on a bearing of N 74°49'28.6" E) to the point 43.64 feet right of and opposite station 174+91.10 on said construction centerline laid out for SR 8 / US 29; thence S 53°45'03.7" E a distance of 19.37 feet to a point 58.28 feet right of and opposite station 175+04.15 on said construction centerline laid out for SR 8 / US 29; thence S 6°17'36.4" E a distance of 42.72 feet to a point 100.74 feet right of and opposite station 174+99.10 on said construction centerline laid out for SR 8 / US 29; thence N 55°42'01.0" W a distance of 57.01 feet to a point 58.50 feet right of and opposite station 174+59.00 on said construction centerline laid out for SR 8 / US 29; thence southwesterly 125.871 feet along the arc of a curve (said curve having a radius of 1707.489 feet and a chord distance of 125.843 feet on a bearing of S 73°44'04.7" W) to the point 58.50 feet right of and opposite station 173+28.82 on said construction centerline laid out for SR 8 / US 29; thence S 71°37'22.1" W a distance of 128.82 feet to a point 58.50 feet right of and opposite station 172+00.00 on said construction centerline laid out for SR 8 / US 29; thence S 70°28'37.3" W a distance of 50.01 feet to a point 59.50 feet right of and opposite station 171+50.00 on said construction centerline laid out for SR 8 / US 29; thence S 70°28'37.3" W a distance of 50.01 feet to a point 60.50 feet right of and opposite station 171+00.00 on said construction centerline laid out for SR 8 / US 29; thence S 70°28'37.3" W a distance of 50.01 feet to a point 61.50 feet right of and opposite station 170+50.00 on said construction centerline laid out for SR 8 / US 29; thence S 70°28'37.3" W a distance of 50.01 feet to a point 62.50 feet right of and opposite station 170+00.00 on said construction centerline laid out for SR 8 / US 29; thence S 77°20'00.2" W a distance of 100.50 feet to a point 52.50 feet right of and opposite station 169+00.00 on said construction centerline laid out for SR 8 / US 29; thence S 71°37'22.1" W a distance of 109.49 feet to a point 52.50 feet right of and opposite station 167+90.51 on said construction centerline laid out for SR 8 / US 29; thence S 70°20'52.9" W a distance of 32.14 feet to a point 52.50 feet right of and opposite station 167+56.03 on said construction centerline laid out for SR 8 / US 29; thence N 22°46'44.3" W a distance of 7.20 feet back to the point of beginning.
Containing 0.257 acres more or less.

EXHIBIT "A"

PROJECT NO.:	STP-0000-00 (844)	Gwinnett County
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48363
00227

BK 4 8 3 6 3 PG 0 2 2 7

P. I. NO.: 0000844
PARCEL NO.: 28 (Tract 1)
DATE OF R/W PLANS: July 21, 2004
REVISION DATE: May 23, 2007

Page 3 of 5

All that tract or parcel of land lying and being in Land Lot 131 of the 6th Land District of Gwinnett County, Georgia, being more particularly described as follows:

ALSO, granted is the right to construct and maintain any required slopes within the easement area shown colored orange on the attached plat.

Beginning at a point 49.79 feet right of and opposite Station 13+00.00 on the construction centerline of US 29/ SR 8 on Georgia Highway Project No. STP-0000-00 (844); running thence northwesterly 203.067 feet along the arc of a curve (said curve having a radius of 1199.220 feet and a chord distance of 202.825 feet on a bearing of N 50°14'48.3" W) to the point 51.73 feet right of and opposite station 14+95.50 on said construction centerline laid out for Lester Road; thence N 55°05'52.0" W a distance of 19.50 feet to a point 51.67 feet right of and opposite station 15+15.00 on said construction centerline laid out for Lester Road; thence N 35°06'20.2" E a distance of 5.33 feet to a point 57.00 feet right of and opposite station 15+15.00 on said construction centerline laid out for Lester Road; thence S 52°51'39.1" E a distance of 118.90 feet to a point 56.00 feet right of and opposite station 14+00.00 on said construction centerline laid out for Lester Road; thence S 51°40'43.0" E a distance of 73.21 feet to a point 59.00 feet right of and opposite station 13+30.00 on said construction centerline laid out for Lester Road; thence S 30°40'49.6" E a distance of 32.61 feet back to the point of beginning.

Containing 0.025 acres more or less.

48363
00228

BK 4 8 3 6 3 PG 0 2 2 8

EXHIBIT "A"

PROJECT NO.:	STP-0000-00 (844)	Gwinnett County
P. I. NO.:	0000844	
PARCEL NO.:	28 (Tract 2)	
DATE OF RAW PLANS:	July 21, 2004	
REVISION DATE:	May 23, 2007	Page 4 of 5

All that tract or parcel of land lying and being in Land Lot 131 of the 6th Land District of Gwinnett County, Georgia, being more particularly described as follows:

ALSO, granted is the right to construct and maintain any required slopes within the easement area shown colored orange on the attached plat.

Beginning at a point 52.5 feet right of and opposite Station 166+89.88 on the construction centerline of US 29/ SR 8 on Georgia Highway Project No. STP-0000-00 (844); running thence northeasterly 51.659 feet along the arc of a curve (said curve having a radius of 722.272 feet and a chord distance of 51.648 feet on a bearing of N 66°13'49.6" E) to the point 52.50 feet right of and opposite station 167+45.30 on said construction centerline laid out for SR 8 / US 29; thence S 22°49'57.4" E a distance of 3.05 feet to a point 55.55 feet right of and opposite station 167+45.36 on said construction centerline laid out for SR 8 / US 29; thence N 67°15'24.7" E a distance of 10.00 feet to a point 55.30 feet right of and opposite station 167+56.12 on said construction centerline laid out for SR 8 / US 29; thence N 22°46'44.3" W a distance of 2.80 feet to a point 52.50 feet right of and opposite station 167+56.03 on said construction centerline laid out for SR 8 / US 29; thence northeasterly 32.146 feet along the arc of a curve (said curve having a radius of 722.272 feet and a chord distance of 32.144 feet on a bearing of N 70°20'52.9" E) to the point 52.50 feet right of and opposite station 167+90.51 on said construction centerline laid out for SR 8 / US 29; thence N 71°37'22.1" E a distance of 109.49 feet to a point 52.50 feet right of and opposite station 169+00.00 on said construction centerline laid out for SR 8 / US 29; thence N 77°20'00.2" E a distance of 100.50 feet to a point 62.50 feet right of and opposite station 170+00.00 on said construction centerline laid out for SR 8 / US 29; thence N 70°28'37.3" E a distance of 50.01 feet to a point 61.50 feet right of and opposite station 170+50.00 on said construction centerline laid out for SR 8 / US 29; thence N 70°28'37.3" E a distance of 50.01 feet to a point 60.50 feet right of and opposite station 171+00.00 on said construction centerline laid out for SR 8 / US 29; thence N 70°28'37.3" E a distance of 50.01 feet to a point 59.50 feet right of and opposite station 171+50.00 on said construction centerline laid out for SR 8 / US 29; thence N 70°28'37.3" E a distance of 50.01 feet to a point 58.50 feet right of and opposite station 172+00.00 on said construction centerline laid out for SR 8 / US 29; thence N 71°37'22.1" E a distance of 128.82 feet to a point 58.50 feet right of and opposite station 173+28.82 on said construction centerline laid out for SR 8 / US 29; thence northeasterly 125.871 feet along the arc of a curve (said curve having a radius of 1707.489 feet and a chord distance of 125.843 feet on a bearing of N 73°44'04.7" E) to the point 58.50 feet right of and opposite station 174+59.00 on said construction centerline laid out for SR 8 / US 29; thence S 55°42'01.0" E a distance of 57.01 feet to a point 100.74 feet right of and opposite station 174+99.10 on said construction centerline laid out for SR 8 / US 29; thence S 6°17'36.4" E a distance of 247.91 feet to a point 346.74 feet right of and opposite station 174+63.86 on said construction centerline laid out for SR 8 / US 29; thence S 83°56'45.8" W a distance of 16.41 feet to a point 344.38 feet right of and opposite station 174+43.67 on said construction centerline laid out for SR 8 / US 29; thence N 6°03'14.2" W a distance of 201.91 feet to a point 144.46 feet right of and opposite station 174+76.54 on said construction centerline laid out for SR 8 / US 29; thence N 14°53'38.1" W a distance of 64.48 feet to a point 80.00 feet right of and opposite station 174+75.00 on said construction centerline laid out for SR 8 / US 29; thence S 73°08'17.5" W a distance of 218.29 feet to a point 80.00 feet right of and opposite station 172+50.00 on said construction centerline laid out for SR 8 / US 29; thence S 65°54'44.0" W a distance of 50.25 feet to a point 85.00 feet right of and opposite station 172+00.00 on said construction centerline laid out for SR 8 / US 29; thence S 73°03'17.6" W a distance of 200.06 feet to a point 80.00 feet right of and opposite station 170+00.00 on said construction centerline laid out for SR 8 / US 29; thence S 74°29'06.8" W a distance of 200.25 feet to a point 70.00 feet right of and opposite station

48363
00229

BK 4 8 3 6 3 PG 0 2 2 9

168+00.00 on said construction centerline laid out for SR 8 / US 29; thence S 71°24'48.6" W a distance of 96.50 feet to a point 65.00 feet right of and opposite station 166+95.30 on said construction centerline laid out for SR 8 / US 29; thence N 47°26'04.7" W a distance of 13.46 feet back to the point of beginning.

Containing 0.470 acres more or less.

3880 PARCEL LEGAL DESCRIPTIONS

Type: DEED Book: 54563 Page: 00774

BK 54563 PG 0774

Ex. "A"

Begin at an iron pin set located at the intersection of the southeasterly right-of-way of U S Highway 29 (100 foot right-of-way) and the northeasterly right-of-way of Lester Road (a 75 foot right-of-way), thence run from said right-of-way Point of Beginning along the southeasterly right-of-way of U S Highway 29 and along the arc of a curve a distance of 198.31 feet (said curve having a radius of 719.94 feet a being subtended by a chord bearing North 58 degrees 02 minutes 04 seconds East a chord distance of 197.68 feet) to an iron pin found; thence run South 53 degrees 23 minutes 33 seconds East a distance of 164.48 feet to an iron pin set, thence run South 48 degrees 30 minutes 40 seconds West a distance of 184.10 feet to an iron pin set and being located on the northeastern right-of-way of Lester Road, thence run along the northeastern right-of-way of Lester Road North 54 degrees 30 minutes 38 seconds West a distance of 198.76 feet to an iron pin set being the Point of Beginning, said property being more particularly described on that certain survey prepared for Perimeter Oil Company by John W. Sianzilis, Jr., Georgia Registered Land Surveyor No. 2109 dated April 25, 1994

50209
00735**BK 50209 PG 0735****PROJECT NUMBER: STP-0000-00(844) GWINNETT COUNTY****PARCEL NUMBER: 24****REQUIRED RW: 0.188 acres of land; and certain easement rights****PROPERTY OWNER(S):** Jim F. Parandi and Mahnoush A. Parandi, trustees of the Parandi Family Living Trust dated May 30, 2006; Farzad Parandi A/K/A Fred Parandi; H.B. Hashemi A/K/A Hashmeih B. Hashemi; Ultra Telecom & Amusement, Inc.; Chavda Enterprises, Inc.; and FN Corporation

All that tract or parcel of land lying and being in Land Lot 151 of the 6th Land District of Gwinnett County, Georgia, being more particularly described as follows:

BEGINNING at the point of intersection of the existing southeastern right of way line of S.R. 8/U.S. 29 with the existing northeastern right of way line of Lester Road, said point being 43.35 feet right of and opposite station 164+76.99 on the construction centerline of S.R. 8/U.S. 29 on Georgia Highway Project STP-0000-00(844); running thence northeasterly along said existing southeastern right of way line of S.R. 8/U.S. 29 an arc distance of 185.95 feet to a point 43.44 feet right of and opposite station 166+73.95 on said centerline; thence northeasterly along said existing southeastern right of way line a distance of 11.85 feet to a point 44.37 feet right of and opposite station 166+86.47 on said centerline, said point also being a point on the property line between the lands of the condemnees and the lands now or formerly owned by Life Investors; thence southeasterly along said property line a distance of 8.73 feet to a point 52.50 feet right of and opposite station 166+89.88 on said centerline; thence southwesterly a distance of 80.06 feet along the arc of a curve to the left (said curve having a radius of 722.27 feet and a chord distance of 80.02 feet on a bearing of S 61° 00' 21.2" W) to a point 52.50 feet right of and opposite station 166+04.00 on said centerline; thence S 0° 06' 42.6" E a distance of 133.33 feet to a point 49.24 feet right of and opposite station 16+43.00 on the construction centerline of Lester Road, said point also being a point on the existing northeastern right of way line of Lester Road; thence northwesterly along said existing northeastern right of way line a distance of 122.41 feet back to the point of BEGINNING. Said described land being the required right of way and is shown colored yellow on the attached plats marked Annex 1-A.

BEGINNING at a point on the property line between the lands of the condemnees and the lands now or formerly owned by Life Investors, said point being 52.50 feet right of and opposite station 166+89.88 on the construction centerline of S.R. 8/U.S. 29 on Georgia Highway Project STP-0000-00(844); running thence southeasterly along said property line to a point 65.00 feet right of and opposite station 166+95.30 on said centerline; thence southwesterly along a straight line to a point 70.00 feet right of and opposite station 165+91.89 on said centerline; thence northerly along a straight line to a point 52.50 feet

Appendix "A" - Annex 1

Parcel No. 24

9.

50209
00736

BK50209PG0736

right of and opposite station 166+04.00 on said centerline; thence northeasterly along a curved line parallel to said centerline back to the point of BEGINNING. Said described land being a permanent easement for the construction and maintenance of slopes and may also be used temporarily for silt control if deemed necessary by the Department of Transportation. Said easement is shown colored orange on the attached plats marked Annex 1-A.

BEGINNING at a point on the property line between the lands of the condemnees and the lands now or formerly owned by Life Investors, said point being 65.00 feet right of and opposite station 166+95.30 on the construction centerline of S.R. 8/U.S. 29 on Georgia Highway Project STP-0000-00(844); running thence southeasterly along said property line to a point 100.00 feet right of and opposite station 167+11.62 on said centerline; thence southwesterly along a straight line to a point 80.00 feet right of and opposite station 165+84.64 on said centerline; thence northerly along a straight line to a point 70.00 feet right of and opposite station 165+91.89 on said centerline; thence northeasterly along a straight line back to the point of BEGINNING. Said described land being a temporary easement for the demolition and removal of underground storage tanks and related equipment and is shown green on the attached plats marked Annex 1-A.

BEGINNING at the point of intersection of the property line between the lands of the condemnees and the lands now or formerly owned by Life Investors with the existing northeastern right of way line of Lester Road, said point being 51.47 feet right of and opposite station 15+69.81 on the construction centerline of Lester Road on Georgia Highway Project STP-0000-00(844); running thence northwesterly along said existing northeastern right of way line to a point 49.24 feet right of and opposite station 16+43.00 on said centerline; thence easterly along a straight line to a point 85.00 feet right of and opposite station 16+15.00 on said centerline; thence southeasterly along a straight line to a point 80.00 feet right of and opposite station 15+85.08 on said centerline; thence southwesterly along a straight line back to the point of BEGINNING. Said described land being a temporary easement for the right to construct a driveway and header curb and may also be used temporarily for silt control if deemed necessary by the Department of Transportation. Said easement is shown colored pink on the attached plats marked Annex 1-A.

The title, estate, or interest in the above described lands, required by condemnor and now taken by condemnor for public use is as follows: Fee simple title to the above described lands all as shown colored yellow on the plats dated the 21st day of July, 2004; Last Revised: Sheet Nos. 9, 10 and 11 on April 21, 2008, and Sheet No. 20 on November 18, 2008, and attached hereto as Annex 1-A.

A permanent easement is condemned for the right to construct and maintain slopes and may also be used temporarily for silt control if deemed necessary by the Department of Transportation. Said easement is shown colored orange on the attached plats marked Annex 1-A.

Parcel No. 24

9A.

50209
00737**BK50209PG0737**

A temporary easement is condemned for the right to demolish and remove underground storage tanks and related equipment. Said easement will expire on May 31, 2011 and is shown colored green on the above mentioned plats. Upon completion of the project, the condemnees shall have the right to use the easement area in accordance with the applicable zoning restrictions.

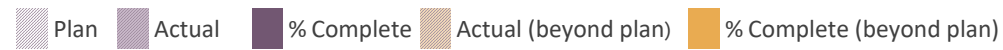
A temporary easement is condemned for the right to construct a driveway to connect the newly constructed road and right of way to the condemnees' remaining lands for driveway purposes, for construction of header curb, and may also be used temporarily for silt control if deemed necessary by the Department of Transportation. Said easement will expire on May 31, 2011 and is shown colored pink on the above mentioned plats. Upon completion of the project, the driveway will remain in place for use by the condemnees.

Parcel No. 24

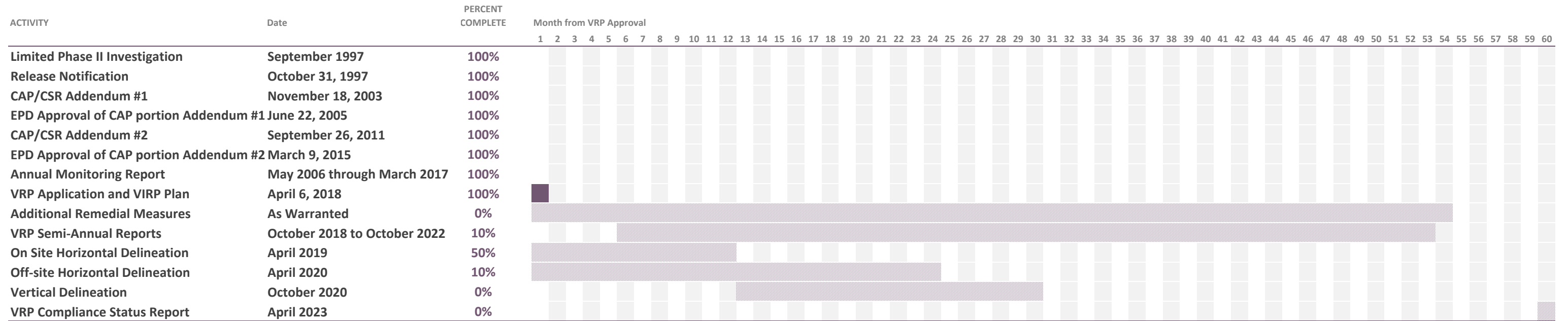
9B.

Appendix 4: Milestone Schedule Gantt Chart

American Amalgamated/Executive Cleaners
3870 and 3880 Lawrenceville Highway
HSI# 10523
SEA Job No. 172-090



Gantt Chart - April 6, 2018



The future dates are based on the VRP submittal date and will be adjusted based on VRP approval