



Voluntary Remediation Plan

**Rayloc Facility
600 Rayloc Drive
Fulton County, Atlanta, Georgia
HSI Site #10547**

Prepared for:

**Genuine Parts Company
2999 Circle Parkway 75
Atlanta, Georgia 30339**

Prepared by:

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600 Chastain Road, Ste 320
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July 2013



July 3, 2013

Mr. Allan C. Nix, P.G.
Georgia Department of Natural Resources
Georgia EPD Response and Remediation Program
2 Martin Luther King Jr. Dr., SE, STE 1462 East
Atlanta, GA 30334

**Subject: Voluntary Remediation Plan
Rayloc Facility
600 Rayloc Drive, SW
Atlanta, Fulton County Georgia 30336
HSI #10547
Sage Project No. 1221-1-2**

Dear Mr. Nix,

Sage Environmental Consulting, L.P., under contract to Genuine Parts Company, respectfully submits this Voluntary Remediation Program (VRP) Plan to enroll this Site in the Georgia Voluntary Remediation Program. The VRP application form and checklist along with a check for \$5,000 was previously submitted to your office on January 7, 2013. A copy of the application form is attached in Appendix A.

Please contact me should you have questions or need further information regarding this submittal.

Sincerely,
Sage Environmental Consulting, LP

A handwritten signature in black ink that reads "Jack A. Wintle".

Jack A. Wintle, P.G.
Senior Regulatory Specialist

Attachments

cc: Mr. Bob Lewis, Genuine Parts Company
Mr. Douglas E. Cloud, Mouwry, Meezan, Coddington & Cloud, LP

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SECTION 1 INTRODUCTION

This Voluntary Remediation Program Plan (Plan) has been prepared on behalf of Genuine Parts Company (GPC) for the Rayloc facility located at 600 Rayloc Drive, Atlanta, Fulton County, Georgia. The Site is an approximate 12.27 acre somewhat rectangular parcel, identified on the Fulton County Tax Assessor's website as Tax Parcel ID 14F-0053-LL-008-5. The majority of the property is occupied by a single story building with associated parking lots. The property has been undergoing investigation and remediation since 1997 under the guidance of the Hazardous Sites Response Program (HSRP). Much of the investigation involves adjacent properties therefore some of the data for this Plan includes offsite data, although Sage has attempted to limit the information for this Plan to the Rayloc property. A copy of the VRP Application Form is appended in Appendix A and includes a legal description and survey plat. A Topographic map and an aerial map of the Site are included as Figures 1 and 2, respectively.

1.1 Site Description

Rayloc (a division of Genuine Parts Company), which operated an auto parts re-manufacturing facility at 600 Rayloc Drive, Fulton County, Atlanta from 1960 to 1997 consists of approximately 12.27 acres of a somewhat rectangular parcel of land located on the southwest quadrant of the intersection of MLK, Jr. Drive and Rayloc Drive.

The surrounding property is predominantly industrial and commercial. Adjacent properties to the Site include the following: Rent Rite facility adjacent to the west; Fulton County (aka Charlie Brown) Airport to the north beyond MLK, Jr. Drive; an abandoned railroad spur to the south with industrial and commercial properties beyond; and a self-storage facility to the east.

1.2 Source Description

Beginning in the 1960's and continuing for approximately 15 years, a waste disposal pit of approximately 20 feet long by 20 feet wide, and 12 to 15 feet deep, was utilized near the southern end of the Rayloc property to dispose of waste materials generated in the plant. No record or recollection of the quantity of the waste disposed in the pit was available, although the waste produced at the Site during that time period came from vapor degreasing, cleaning, and surface coating operations. This investigation and remediation is being conducted as part of the Georgia Hazardous Sites Response Program (HSRP) requirement, which involves voluntary cleanup in conjunction with regulatory compliance.

1.3 Summary of Previous Work

A site investigation was conducted on the adjacent Rent Rite property in March 1997 as part of a property transaction and VOCs were discovered in the groundwater. In response, a site investigation was initiated at the Rayloc facility in June 1997 in order to determine the source of VOCs found on the Rent Rite property. The Rayloc Site investigation revealed soil and groundwater contamination at the Rayloc facility. Based on the information gathered during the investigation, Genuine Parts Company prepared and submitted a Hazardous Sites Response Release Notification for the Rayloc property dated October 1997.

The HSRP requested the preparation and submittal of a CSR in order to document the current status of the Site with regard to the risk reduction standards outlined in the HSRP Rules. An interim CSR was provided to the HSRP dated December 29, 2003 which then sent a Notice of Deficiency for the CSR dated June 18, 2004, outlining their comments and requirements for completing the CSR. Revised CSRs, dated November 30, 2004 and September 14, 2006, were completed and submitted to the HSRP for review.

Site work for the CSR was performed between June of 2003 and September of 2006. Soil samples were collected from 39 locations and groundwater samples from 27 locations around the known source area, at and near the Site.

Subsequently, a total of 18 groundwater monitoring wells were installed to be used for horizontal delineation, 3 deep, double-cased wells and 2 deep single-cased wells were installed into the bedrock to be used for vertical delineation.

Soil impact has been delineated horizontally at the Site while vertical delineation was not possible due to the source impact migrating from the source into the Site groundwater. Groundwater impact has been delineated horizontally; however, vertical delineation has not yet been achieved. Generally, groundwater impact has migrated to the bedrock surface. Moreover, the bedrock wells installed to date have not proved adequate to determine the lower boundary of the impact to the Site groundwater.

Based on the results of numerous investigations at and near the Site, GPC contracted with the McMillan-McGee Corporation (MC²) to conduct in-situ thermal remediation of the source material associated with the former waste pit using the Electro-Thermal Dynamic Stripping Process (ET-DSP™). This process provides electrical resistance heating (ERH), convective heat transfer through in-situ steam stripping and conductive heat transfer for accelerated removal and volatilization of non-aqueous phase liquids (NAPLs) in the soil and groundwater.

The ET-DSP™ process used 1,122 electrodes in 28 approximately 70 foot borings, 15 multi-phase extraction (MPE) wells, 6 digiTAM™ temperature sensors and an oil/water separator, air stripper and carbon adsorption unit. The estimate of the mass of contaminants removed was greater than 150,000 pounds.

This remedial effort was conducted for a period of approximately one year, terminating in May 2008. While some impact to the Site soils and groundwater does persist in the remediated pit area, concentrations in both are far below those observed prior to remediation.

Groundwater from the northwestern portion of the Site flows west along MLK, Jr. Drive towards the Chattahoochee River (located approximately 2,500 feet west of the Site) and groundwater from the remainder of the Site flows towards a drainage feature approximately 2,000-feet south.

Calculations of the Risk Reduction Standards for Groundwater Type 1 and Soil Type 3 determined that the Site soil and groundwater are not in compliance with any risk reduction standards.

A Corrective Action Plan (CAP) was submitted to the EPD in March 2012 and was given conditional approval on May 24, 2012.

1.4 Objective of the VRP Plan

The objective of this VRP Plan is to support an application for enrollment into the Voluntary Remediation Program. This Plan documents a current understanding of the environmental conditions at the Site.

1.5 Property Eligibility

The Site meets the eligibility criteria for the Voluntary Remediation Program. A release of regulated substances to the Site has been confirmed; the Site is not listed on the National Priorities List; is not currently undergoing response activities required by an order of the regional administrator of the federal Environmental Protection Agency; and, is not required to have a permit under code 12-8-96.

1.6 Participant Eligibility

LRL Holdings of Georgia, LLC is the property owner and Voluntary Remediation Program applicant and is not in violation of any order, judgment, statute, rule, or regulation subject to the enforcement authority or the director with respect to this Site.

SECTION 2

CONCEPTUAL SITE MODEL

The Conceptual Site Model (CSM) is intended to create a living document to foster and support intelligent decision making as site characterization progresses and remedial alternatives are selected to mitigate the impacts to soil and groundwater resulting from onsite source(s).

2.1 Geologic Setting

Georgia is divided into three major geologic regions: Ridge and Valley, Blue Ridge and Piedmont, and the Coastal Plain. The Ridge and Valley region in the northwest corner of the state is typified by northeast-trending ridges and valleys with flat-topped mountains in the extreme northwest comprised of sedimentary rocks including sandstone, shale, limestone, dolomite, and chert. The Blue Ridge and Piedmont in the northeast and central portions of the state present rounded mountains in the north with foothills diminishing south to the Fall Line.

2.1.1 Regional Geology

In the greater Atlanta area, the Blue Ridge and Piedmont is further subdivided into the Blue Ridge and Piedmont regions with the Piedmont being further subdivided by the terms north and south to describe those rocks to the northwest and southeast of the Brevard fault zone, respectively.

The Brevard Fault Zone has been subject to substantial debate regarding structure and significance, and the nature and direction of ancient movement on the fault. The Brevard has been interpreted as having an early dip-slip movement by normal and reverse faulting followed by subsequent motions of left and right lateral strike-slip faulting. Historical information indicated that the Brevard Fault Zone represented the suture where Proto-Africa collided with Proto-North America to form Pangaea. However, geologic mapping shows that rocks on either side of the fault zone generally resemble each other.

It is understood that the Brevard Fault Zone of the southern Appalachian Mountains extends for more than 500 kilometers along the strike line. Within the Brevard, the rock and residual soil generally dip toward the southeast. The Brevard Fault Zone appears to be relatively inactive characterized by narrow ridges and highly variable subsurface conditions. This area has undergone numerous ancient seismic events, which have caused extensive folding, faulting, and fracturing on the native bedrock.

Throughout the region, bedrock is overlain by a mantle of unconsolidated material known as regolith. The regolith includes, where present, the soil zone, a zone of weathered, decomposed bedrock known as saprolite, and alluvium.

Saprolite, the product of chemical and mechanical weathering of the underlying bedrock, is typically composed of clay and coarser granular material up to boulder size, and may reflect the texture of the rock from which it was formed. Thus, the weathering product of granitic rocks may be quartz-rich and sandy-textured, whereas rocks poor in quartz and rich in feldspar and other soluble minerals form a more clayey saprolite. Alluvial and terrace deposits are generally restricted in area and thickness and represent a very small fraction of the geology of the region (Legrand, 2004).

2.1.2 Local Geology

Reviewed geologic information indicates that the Site bedrock is a member of the "Brevard Zone Undifferentiated" (BZ) formation. The Brevard Fault Zone Undifferentiated is of Late Paleozoic Age (Carboniferous Period, approximately 286 to 360 million years ago) and is described as an area consisting of profoundly ductilely sheared and fractured rocks, particularly button schists and mylonites. However, the boundary between BZ and the Ben Hill Granite (CB) coincides with the southern Site property line and bedrock cores collected beneath the Site suggest that the Site bedrock is gneissic in character, potentially a metamorphic expression of the Ben Hill Granite.

2.1.3 Site Geology

The Rayloc facility is situated atop a narrow northeast-southwest trending ridge with a thick regolith of soil, and a transition zone of saprolite and partially weathered rock (PWR) above the bedrock surface that dips south and southeast away from the source area.

The Site is located within the Brevard Fault Zone of the southern Piedmont physiographic province of Georgia. The Brevard Fault Zone separates the northern Piedmont from the southern Piedmont and runs in a southwest-northeast direction. This fault zone is bounded by rocks of the Atlanta Group to the southeast and the Sandy Springs Group to the northwest. These boundaries were identified by the presence of a well-developed secondary foliation termed cataclastic foliation. This type of foliation is axial-planar to second generation folds present in areas outside the Brevard Fault Zone. Rocks that have undergone intense ductile shearing and fracturing in the Brevard fault Zone include: protomylonites, mylonites, blastomylonites, button schists, and phyllonites.

2.1.3.1 Bedrock

Four bedrock wells were installed at the Site, RAD-2 through RAD-5. Based on an examination of the bedrock cores, the Site bedrock has been tentatively identified as fractured muscovite-biotite quartz-plagioclase-microcline granite gneiss with RQDs that ranged between 69 percent in RAD-5 and 99 percent in RAD-4. Weathered rock was observed in one 20-inch section of the RAD-5 core taken from 67-feet to 72.5-feet bgs and fracture rates ranged from 0.4 to 1.2 fractures per foot.

2.1.4 Cross Sections

A total of four intersecting cross sections were compiled for this project (A-A', B-B', C-C' and D-D') utilizing lithological data compiled during the subsurface investigations. These cross sections include both the Site and surrounding properties and were included to provide an overall picture of the Site area. They provide an approximated subsurface view of the lithology and groundwater levels across the Site and adjacent properties, including the identified residuum, saprolite, partially weathered rock and bedrock depths. While fill was encountered in one of the well on the northwest corner of the Site and residuum was encountered at shallow depths around the Site, saprolite was the predominant soil type throughout the Site subsurface. The bedrock surface encountered was highly irregular throughout the Site with at least one potential trough identified. Please refer to Figures 3 through 7 for the Cross Section Maps.

2.1.4.1 Cross Section A – A'

Cross Section A-A' runs north to south and includes the area between monitoring wells MW-4 and MW-11. This section begins on and crosses the CASE property, a corner of the Rent Rite property, B&D Concrete Cutting property, Wendell Drive, North Georgia Granite and Marble property, then crosses the ravine and ends in the Mosely Motel parking lot.

Bedrock in this cross section is quite irregular and varies from 43 feet bgs in MW-15 to 75 feet bgs in MW-5A with the bedrock surface being shallowest at MW-13 at 43 feet bgs and falling off in both north and south directions from there.

2.1.4.2 Cross Section B – B'

Cross Section B-B' also runs in a north to south direction and includes the area between monitoring wells MW-3 and MW-7. This section begins on and crosses the Rayloc property, Housing Authority of Fulton County property, Wendell Drive, the former Perdue property and ends at the ravine.

Bedrock in this cross section varies from 31 feet bgs in MW-17 to 88 feet bgs in MW-18 with the bedrock surface being shallowest at PT2-3 at 65 feet bgs and falling sharply to the south into a trough at MW-18 at 88 feet bgs then rising back up at MW-17 to 31 feet bgs.

2.1.4.3 Cross Section C – C'

Cross Section C-C' runs northeast to southwest and includes the area between monitoring wells MW-2 and MW-14. This section begins on and crosses the Rayloc property, Housing Authority of Fulton County property, Pett Spice property, B&D Concrete Cutting property, Printpack property, Wendell Drive and ends near the Printpack parking lot.

Bedrock in this cross section varies from 25 feet bgs in PST-2 to 77 feet bgs in MW-14 with the bedrock surface being shallowest at PST-2 and falling off both towards the northeast and southwest from there. There appears to be a small trough at RAT-5 at 70 feet bgs.

2.1.4.4 Cross Section D – D'

Cross Section D-D' runs east-northeast to south-southwest and includes the area between monitoring wells MW-9 and MW-14. This section begins on the Selig property and crosses the 500 Interchange Drive property, Ogden Forklifts property, Housing Authority of Fulton County property, Pett Spice property, B&D Concrete Cutting property, Wendell Drive and ends near the Printpack parking lot.

Bedrock in this cross section varies from 34 feet bgs in MW-9 to 88 feet bgs in MW-18 with the bedrock surface being erratic. Two troughs are apparent; one at IWT-3 at 53 feet bgs and one at MW-18 at 88 feet bgs.

2.1.4.5 Cross Section Summary

Bedrock in the Site and surrounding area is quite irregular and varies from as shallow as 25 feet to 88 feet bgs. Based on the drilling conducted at the Site, it appears that there is a trough in the bedrock running from the source area south across the Fulton County Housing Authority property and towards the drainage feature south of Wendell Drive.

Although the trough is not consistent in slope, it does appear to be running north-south towards the drainage feature. PT2-1 is located immediately south of the source area with bedrock encountered at 65 feet bgs (755.25), FCT-2 located approximately 270 feet south encountered bedrock at 65 feet bgs (733.79) and MW-18, located another 270 feet south, near Wendell Drive, encountered bedrock at a depth of 88 feet bgs (713.82) and is at the southern end of the potential trough. This trough may be a conduit for dnaps to migrate towards the drainage feature over time although no evidence of dnaps was identified during this investigation. Further investigation is necessary to define the trough in this area.

2.2 Environmental Conditions

The following sections describe the current environmental conditions with respect to the source area and site groundwater.

2.2.1 Soil Sampling

Between June 2003 and September 2006, a total of 72 soil samples were collected using DPT probes from 39 locations around the known source area. Based on the analytical results from the initial soil samples collected immediately south of the source area, it was necessary to access adjacent properties farther south to complete the soil delineation in this direction.

In an attempt to narrow the horizontal soil delineation, additional DPT probes were advanced south and east and north of the source area. Based on the results, although minor detections were noted in some of the samples, the data indicates that the impacted soil has been delineated to the source area on the Rayloc property.

Vertically, soil contamination in the impacted area extends to and into groundwater. Hence, no vertical soil delineation is possible in the source area.

2.2.2 Groundwater Sampling

2.2.2.1 *Horizontal Groundwater Delineation*

Groundwater has not been completely horizontally delineated at the Site. The horizontal groundwater delineation was initiated by collecting and analyzing groundwater samples collected from locations surrounding the known source area.

Please refer to Tables 1 and 2 for summaries of the groundwater analytical data, Figure 3 for Cross Section Locations, Figures 4 through 7 for Cross Sections, Figure 8 for a Potentiometric Surface Map and Figure 9 for a site map showing the horizontal delineation of PCE in groundwater.

2.2.2.2 *Vertical Groundwater Delineation*

Vertical delineation of the Site impact was not accomplished by the deep wells installed. A double-cased monitoring well (RAD-1) was installed approximately 50-feet north and east of the former waste pit.

Results of the groundwater sample collected from this double-cased well indicated that the impacted groundwater had not been vertically delineated, likewise, bedrock wells RAD-4 and RAD-5 did not accomplish vertical delineation, however, the concentrations of VOCs detected in these wells were markedly lower than RAD-1. Abandoned bedrock wells RAD-2 and RAD-3 were not sampled for groundwater.

2.2.3 Pilot Studies and Remedial Actions

The source of impact identified at the Site is the former waste disposal pit located near the southern corner of the Rayloc property.

Based on the results of numerous investigations at and near the Site, in-situ thermal remediation of the source material associated with the former waste pit was conducted as previously discussed.

The estimate of the mass of contaminants removed was greater than 150,000 pounds. Some impact to the Site soils and groundwater does persist in the remediated source area, however, the current levels are far below those observed prior to remediation and the remaining soil impact will not significantly affect the groundwater plume. The groundwater impact within the treated zone is likewise minor relative to the groundwater levels observed just south of the treated zone.

During the thermal remediation activity, average subsurface temperatures exceeded 100 degrees Celsius (212 degrees Fahrenheit) and a return to ambient temperatures was expected by June of 2009, however the June 11, 2009 measurement indicated temperatures remain above 32 degrees Celsius (90 degrees Fahrenheit). The heated groundwater in and around the treatment zone has the potential to stimulate biological activity and thereby further degrade the contaminants that remain.

Vertical delineation of the plume is not well defined. We do know that impact persists into shallow fractures in the transition zone atop the bedrock surface.

GPC conducted three separate Pilot Studies in order to determine the most feasible and effective treatment to take to full scale. The first two Pilot Studies at the Site included injection of a slow-release hydrogen compound HRC[®] (which accelerates biodegradation of chlorinated solvents in groundwater) and in-situ chemical oxidation (ISCO) that utilizes various chemical compounds to break down certain groundwater contaminants into harmless compounds.

These first two Pilot Studies were conducted side by side within the plume and situated approximately 100 feet downgradient from the former waste pit with less than satisfactory results, mostly due to the tight geologic conditions which prohibited the necessary injection of materials into the surrounding subsurface.

The third Pilot Study (eGeo Services, Inc.) was conducted with the primary objective of evaluating the effectiveness of gas infusion technology in the Site's tight geologic formation, and to determine the optimal system design parameters for full scale remediation.

In summary, the pilot study was successful in demonstrating that reductive dechlorination will occur under the aquifer conditions created by the process. The eGeo system converted an oxidative environment, DO= 5 ppm, ORP=+280, to a reductive environment, DO=0 ppm, ORP= -190, in 30 days.

The results provide compelling evidence that sequential reduction of PCE to vinyl chloride has occurred in the pilot study zone of influence via Anaerobic Reductive Dechlorination. The dramatic increase in daughter products CIS-dichloroethene (DCE) and the intermediate vinyl chloride are directly and uniquely correlated with the relatively substantial reduction of PCE and TCE. During the injection process, it is suspected that slugs of PCE and TCE migrated into the injection zone, so the magnitude of reduction in PCE concentrations does not appear consistent with the higher magnitude of daughter product formation.

2.3 Potential Receptors and Exposure Pathways

This section describes potential human exposures and receptors as well as exposure pathways.

2.3.1 Environmental Receptors

The Site is located in a suburban industrial/commercial setting. Common environmental receptors in this type setting may include protected species, wetland areas, and surface water bodies.

2.3.1.1 Protected Species

Information compiled by the Georgia Department of Natural Resources Wild Resources Division was reviewed for the State of Georgia and more specifically for the Mableton, GA, SE Quarter Quad to identify sensitive wildlife receptors or protected species near the Site. While there was no information given for sensitive wildlife receptors on the website, protected species that potentially live near the Site were listed as the Chattahoochee Crayfish (Crustacean) and the Gulf Moccasinshell (Mollusk). These animals would be found in perennial streams or surface water bodies, neither of which were identified on the Site or adjacent properties.

2.3.1.2 Wetlands and Surface Water Bodies

A review of the National Wetland Inventory (NWI) map for the Mableton quadrangle in Atlanta, Georgia, prepared by the U.S. Fish and Wildlife Service, indicates that the Site and adjacent properties are not located in identified wetland areas nor did Sage identify wetland areas on the Site.

No perennial streams or other surface water bodies were identified on the Site or on adjacent properties. The nearest surface water body is the Chattahoochee River, which is located approximately 0.6 miles west from the Site. Based on the distance and surrounding topographic conditions, this river is hydraulically connected to groundwater flow across the Site and is therefore considered a likely receptor.

2.3.2 Potential Human Receptors

Human receptors at the Site include building occupants and others that may utilize the property. The site building is surrounded by a locked fence with a security system in place that includes camera surveillance. Personnel associated with the facility business are the human receptors.

The source area includes an asphalt and concrete covered area completely enclosed within a locked, razor wire topped fence that is located within the facilities fenced security system. The only human receptors in this area are the environmental professionals engaged in the project.

2.3.3 Exposure Pathways

2.3.3.1 Soil

Contact with soil in the source area is not a concern because the source area is asphalt and concrete covered and completely enclosed within a locked, razor wire topped fence that is located within the facilities fenced security system.

The entire Rayloc property within the fence is asphalt or concrete covered with no access to surface soil. Therefore, direct human exposure to the Site contaminants is an incomplete pathway.

2.3.3.2 Groundwater

Chlorinated VOCs are present in the Site groundwater. Based on the well and surface water sources supply survey conducted in 2006, the following conclusions were made:

1. There is one apparently abandoned and unused private water supply well at the adjacent north Fulton County Airport. No other public or private water supply wells are located within a 0.5-mile radius of the subject Site based on our survey.
2. There are no public or private water supply wells located within 1.5-mile radius of the subject Site according to the USGS Groundwater Site Inventory database.
3. Two private water wells are located between 1.5-miles and 2-miles southwest of the Site.

The nearest surface water body feature is an unnamed perennial stream located approximately 425 feet northwest of the Rayloc facility which runs along the southern side of MLK, Jr. Drive for approximately 2,000 feet where it curves south for approximately 2,000 feet and drains into the Chattahoochee River. It appears from the potentiometric surface map that the groundwater from the outfall locations flow to the west toward this drainage feature.

Based on a review of the 7.5-minute USGS Mableton, Georgia topographic quadrangle, a dry drainage feature is present approximately 900-feet south of the Site, across Wendell Drive, beginning east of the Perdue building (4290 Wendell Drive) and continuing west approximately 3,700-feet where it drains into the Chattahoochee River.

It appears both from the potentiometric surface map and the analytical data that the impacted groundwater at the Site is migrating south from the Site towards this dry drainage feature. Please refer to Figure 2 for a topographic map of the Site.

2.3.3.3 *Volatilization to Indoor Air*

Due to the presence of chlorinated solvents in the groundwater, Sage has collected soil-vapor samples from the adjacent, downgradient properties as part of the HSRA project and based on the results, there is no unacceptable risk or hazard for occupational receptors in those properties. Groundwater at those locations is shallower than at the Rayloc facility and the known impact higher for the offsite properties, therefore the risk of vapor intrusion is less.

Sage will conduct soil-vapor sampling from within the Rayloc building to ensure there has not been vapor intrusion to indoor air.

2.4 Regulatory Compliance

The Rayloc Site qualifies as non-residential property in accordance with Rule 391-3-19-.02 (2) (b), as “any real property or portion of a property not currently being used for human habitation or for other purposes with a similar potential for human exposure, at which activities have been or are being conducted that can be categorized in one of the 1987 Standard Industrial Classification (SIC) major groups.”

2.4.1 Risk Reduction Standards

The Site soil and groundwater currently do not comply with any Risk Reduction Standards.

2.4.1.1 *Groundwater Evaluation*

The Site groundwater was evaluated in accordance with the Rule 391-3-19.07 to demonstrate compliance with requirements under the Hazardous Sites Response Act (HSRA) for corrective action of all regulated substances released at the Site. The regulated substances released at the Site into the groundwater are volatile organic compounds. The groundwater was evaluated under criteria for Type 3 Risk Reduction Standards (RRS) which provide for regulated substance concentration that pose no significant risk on the basis of standardized exposure assumptions (Type 3) for the non-residential site use.

The Site qualifies as a non-residential property in conformance with Rule 391-3-19.02(2) as all of the contiguous lots are vacant land or commercial properties.

Rule 391-3-19.07(8)(c) for Type 3 groundwater standards (which are the same as Type 1) require that at any point within groundwater that has been affected by a release, concentrations of regulated substances in groundwater samples shall not exceed concentrations given in Table 1 of Appendix III, or for those substances not listed, the background or detection limit concentration.

The following table lists the Type 3 RRS concentrations for groundwater at the Site:

Table 1 of Appendix III

Compound	Detection Limit Concentration
1,1-Dichloroethane	4,000
2-Butanone	2,000
Acetone	4,000
Cis-1,2-Dichloroethene ¹	- -
Ethylbenzene	700
Methylene Chloride	5
Styrene	100
Tetrachloroethene	5
Tetrachloroethene	1,000
Trans-1,2-Dichloroethene	100
Trichloroethene	5
Vinyl Chloride	2
Xylenes (Total)	10,000

Notes:

All concentrations are presented in ppb.

¹ – *Detection limits will be used for this compound.*

2.4.1.2 Soil Evaluation

The Site soil is evaluated in accordance with Rule 391-3-19.07 to demonstrate compliance with requirements under HSRA for corrective action of all regulated substances released at the Site. The regulated substances released at the Site into the soil are volatile organic compounds.

The soil is evaluated under criteria for Type 3 standards, which provide for regulated substance concentration that prove no significant risk on the basis of standardized exposure assumptions for non-residential site use. Please refer to the 2006 CSR Appendix E for a copy of the calculations.

Rule 391-3-19.07(8)(d) has two sets of Type 3 soil standard criteria. The first set, which serves to protect groundwater, applies at any point above the water table in soil that has been affected by a release. The second set, which addresses human exposure through ingestion and/or inhalation of soil particles, applies only to soil within two feet of land surface and is relevant only where such target concentrations are more stringent than those derived from the first set. The second set is not applicable at this Site.

Applying the Type 3 criteria to the Site soils, the appropriate concentrations are derived by multiplication of the Type 1 groundwater concentration criteria by a factor of 100.

The following table lists the Type 3 concentrations and the concentration that will be used at the Site:

Table 1 of Appendix III

Compound	Detection Limit Concentration (Table 1 x 100)
1,1-Dichloroethane	400
2-Butanone	200
Acetone	400
Cis-1,2-Dichloroethene ¹	--
Ethylbenzene	70
Methylene Chloride	0.50
Styrene	10
Tetrachloroethene	0.50
Tolene	100
Trans-1,2-Dichlorethene	10
Trichloroethene	0.50
Vinyl Chloride	0.20
Xylenes (Total)	1,000

Notes:

All compounds are presented in ppm.

1 – Detection limits x 100 will be used for this compound.

SECTION 3

REMEDIAL ACTION PLAN

As documented in the March 2012 CAP, soil impacts above Type 3 or Type 4 RRS will be remediated in the waste pit area using the eGeo Gas Infusion Technology.

Sage has implemented the eGeo Gas Infusion Technology at the Site. The eGeo technology selected for the Rayloc CAP includes a process to drive reductive dechlorination of PCE. The necessary preconditions for successful reductive dechlorination are achieved by creating an anaerobic environment (very low dissolved oxygen levels) under reducing conditions (ORP less than zero). During the Pilot Study, the Dynamic Diffusion[®] system transformed an oxidative environment (8 ppm DO and +280 ORP) to a reducing environment (0 ppm and -190 ORP) in 30 days.

The system has been configured to inject hydrogen and methane gas with triethyl phosphate (TEP) vapor via a nitrogen gas carrier stream. The percentage of each component has a theoretical basis; methane is used as a cometabolic carbon source and will be limited to 4% or less to avoid explosive levels. Hydrogen is employed because the electron donor role is critical to cleave the 4th chlorine atom off the PCE molecule. If the hydrogen concentration is too high, the methanogenic bacteria will out-compete the dehalococci for the electron, and the reductive dechlorination process will be impeded.

After satisfactory reduction of PCE, the system will be converted to aerobic operation using compressed air, nitrous oxide and oxygen gas. TCE and the remaining daughter products are more effectively reduced in an oxidative environment. The oxygen levels in the soil vapor are maintained between 15 and 24% to maximize the process while avoiding potentially explosive interaction between the oxygen and combustibles. Automated instrumentation and alarms are utilized to detect harmful levels of carbon dioxide, methane, and oxygen during the process. The systems at Rayloc will include digital valves and switches that will shut the injection process down if anything is detected that poses a potential health and safety threat.

The potential for dense non-aqueous phase liquid (DNAPL) at the Site was mentioned by the EPD in the Conditional Approval of the Corrective Action Plan letter dated May 24, 2012. To the extent any such DNAPL is determined to constitute source material within the meaning of the Brownfields Act, further corrective action measures will be implemented.

Other documented source areas were noted during a site visit performed in August 2012 as part of the Prospective Purchasers Corrective Action Plan (PPCAP) and are listed below:

1. An area inside the building where the maintenance shop was located which included floor drains along with a washing machine sand trap. The maintenance shop may have used the same solvents used in the operations at the Site and resulted in releases to the floor drains. The washing machines were reportedly used to clean shop rags used at the facility, and as such may have contained solvent residues that would have been

discharged through the sand trap to the sewer system. It should be noted that the plumbing section between the maintenance shop and the washing machines required repair and replacement at some point in the past as relayed by the Site plumber of 40 plus years.

2. A parts disassembly and cleaning area was maintained to prepare used parts for reconditioning and utilized solvents to remove oils and grease from the parts during the disassembly and cleaning process. The area showed signs of floor and wall staining and was the primary area in the operation for the use of the solvents disposed in the waste pit.
3. A cleaning oven was used in the brake disassembly process to remove the friction material from the lining by dissolving the mastic.
4. An area of what appears to be caustic deterioration of the block wall was noted outside the parts disassembly and cleaning area. This area is immediately adjacent to an open trench.
5. Open trenches within the concrete historically used to channel surface runoff were noted in and around the core barn and covered shed areas where used parts were stored prior to disassembly and cleaning. A number of these trenches appear to have staining consistent with oil and grease.
6. The storm sewer system along the western property boundary collected the runoff from the areas noted above and may have impacts resulting from the surface water transport of COCs.
7. The former AST area in the rear of the building was used to provide bulk storage for the chemicals used in the Site operations. According to representatives of Genuine Parts Company, the chemicals would be placed in these ASTs and then transferred to smaller vessels for use throughout the facility.
8. The former USTs represent a potential source of petroleum constituents.

Soil conditions in the forgoing potential source areas will be assessed as part of the confirmatory investigations concurrent with the corrective action measures and based on the findings additional corrective action measures will be implemented as necessary to bring the soil into compliance with Type 3 or Type 4 RRS and to eliminate any source material as the Georgia Environmental Protection Division (EPD) may require under the Brownfields Act.

SECTION 4 REFERENCES

Georgia Voluntary Remediation Program Act, June 1, 2009.

Agency for Toxic Substances and Disease Register (ASTSDR). Evaluating Vapor Intrusion Pathways at Hazardous Waste Sites.

Clark & Zisa, A Physiographic Map of Georgia, Department of Natural Resources, Georgia Geologic Survey, 1987.

Oasis Environmental Services March 8, 2006, Corrective Action Plan, Rayloc/RentRite Facility.

Sailors Engineering Associates, Inc., September 27, 2012, PPCAP.

SECTION 5
TABLES

Table 1 Monitoring Well Data Summary

TABLE 1 - Summary of Monitoring Wells and Groundwater Elevations**Rayloc Facility****600 Rayloc Drive****Fulton County, Georgia****HSI # 10547**

Monitoring Well Identification	Well Depth (feet)	Depth of Screened Interval (feet)	Top of Casing Elevation (TOC) (feet)	Static Water Level On 11/28/12	Groundwater Elevation On 11/28/12
MW-1	33	23 - 33	837.17	30.11	807.06
MW-2	41	31 - 41	852.76	35.97	816.79
MW-3	29	19 - 29	832.66	21.06	811.60
RAD-1	75	70 - 75	850.81	49.5	801.31
RAD-2	AB ²	AB ²	AB ²	AB ²	AB ²
RAD-3	AB ²	AB ²	AB ²	AB ²	AB ²
RAD-4	103	NI	852.12	50.69	801.43

NI - Not Installed

NM - Not Measured

AB² - Abandoned April 1, 2006

Table 2 Monitoring Well Groundwater Analytical Results Summary

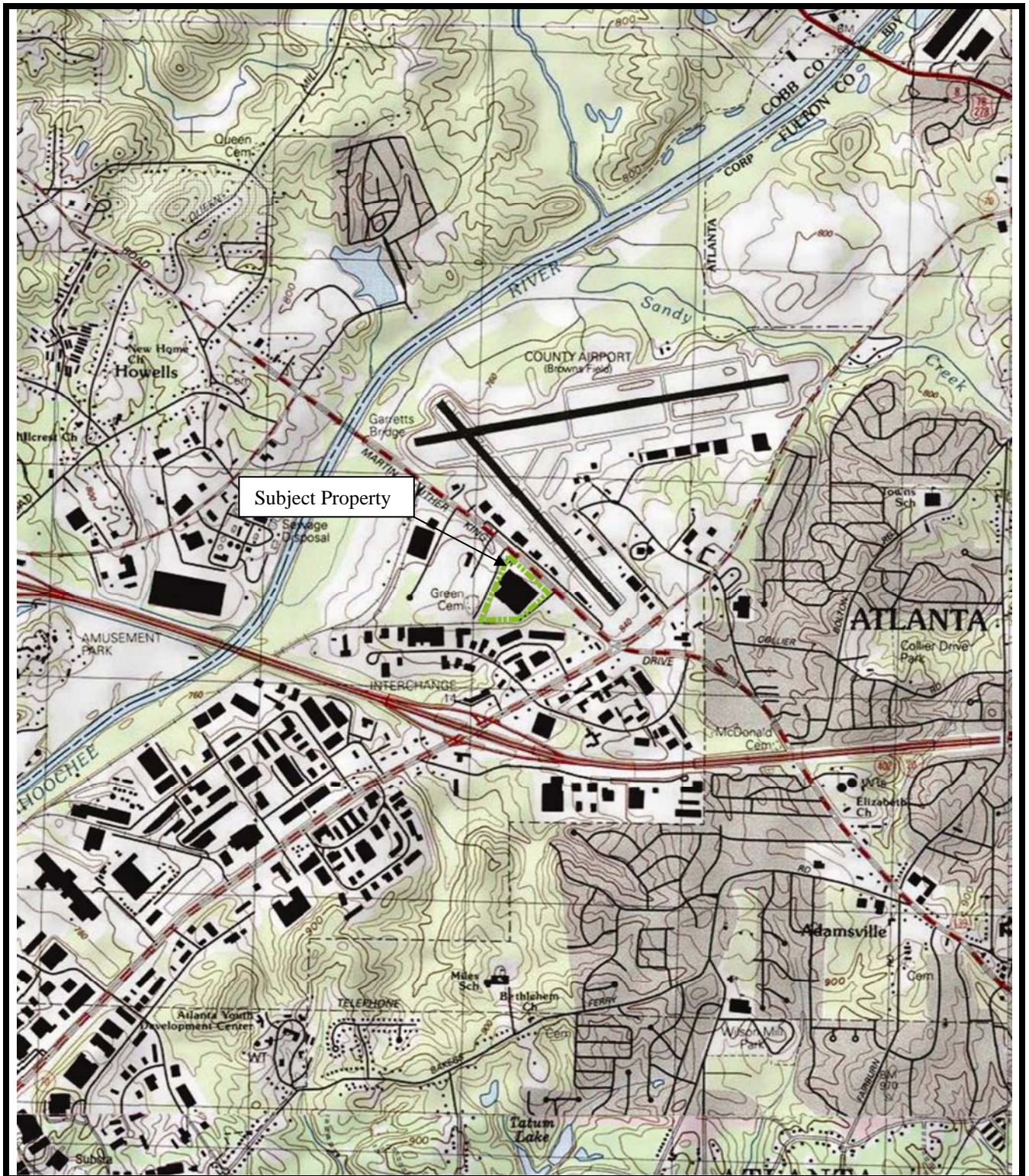
Table 3 Summary of VRP Professional Oversight Hours

TABLE 3 - Summary ofVRP Professional Oversight Hours**Rayloc Facility****600 Rayloc Drive****Fulton County, Georgia****HSI # 10547**

Date	Hours	Activity Description
5/17	1	Received authorized proposal and discussed with Mr. Lewis.
5/20	4	Researched VRP Plan requierements pertaining to site
5/22	2	Reviewed PPCAP and the previously submitted VRP Application
5/27	2	Reviewed CAP and began drafting Plan
5/28	2	Continued drafting Plan
5/30	2	Continued drafting Plan
6/3	2	Continued drafting Plan
6/6	2	Continued drafting Plan, tables and figures
6/7	1	Submitted Figures and Cross Sections to CAD
6/11	1	Continued drafting Plan
6/13	2	Revised Figures and Cross Sections
6/14	1	Continued drafting Plan
6/17	1	Continued drafting Plan
6/18	4	Reviewed and revised figures and cross sections
6/19	3	Continued drafting and revising Plan
6/20	4	Continued drafting and revising Plan
6/24	4	Continued drafting and revising Plan
6/25	4	Reviewed draft Plan and made comments
6/27	4	Reviewed and revised Plan
6/28	4	Finalized Plan - Put in for senior review
7/3	6	Finalizing Report

SECTION 6
FIGURES

Figure 1 Site Topographic Map





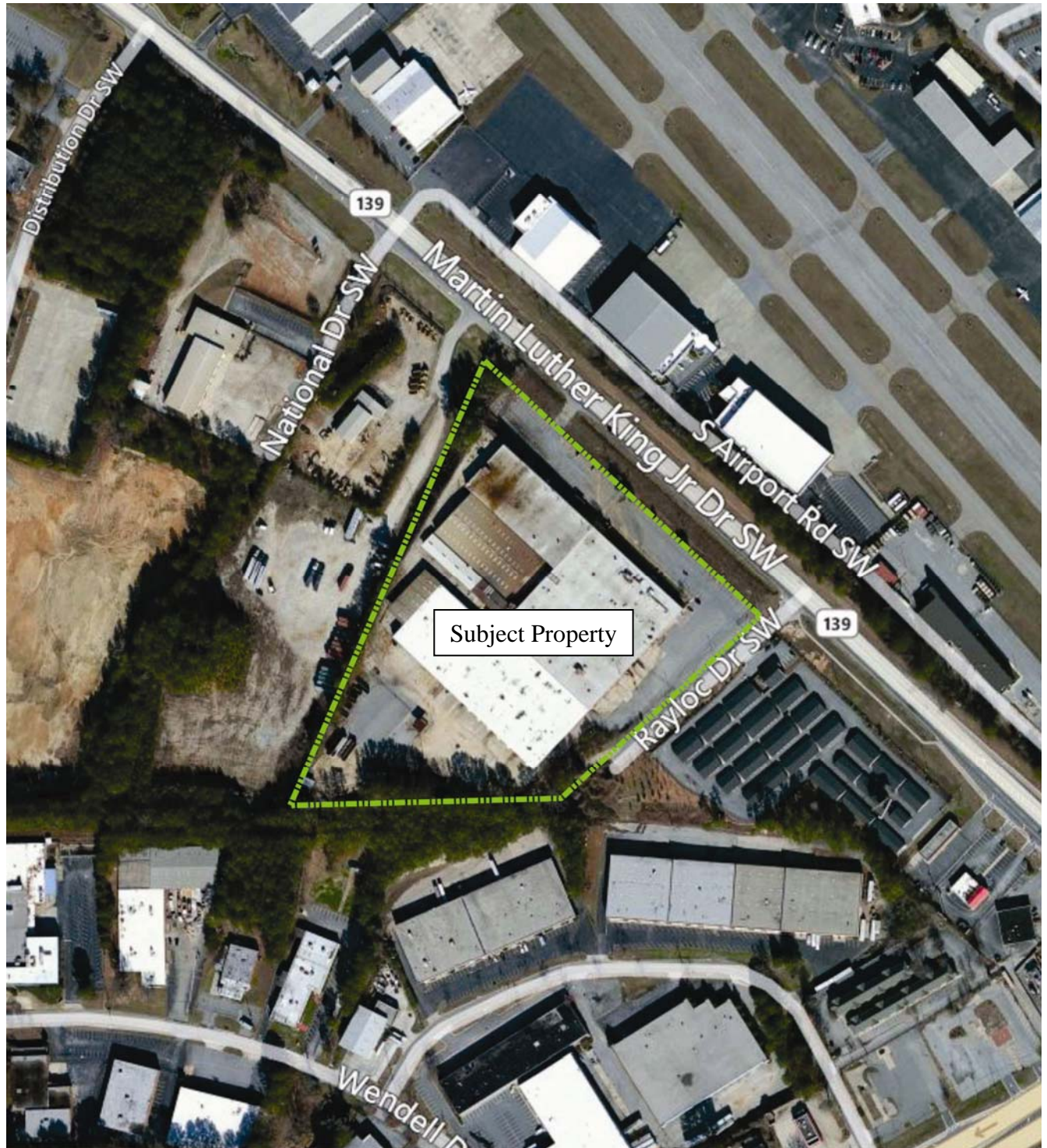
Legend		Figure 1 – Site Topographic Map	Scale
Map Source: USGS Topo Map Mableton Quad		Rayloc Facility 600 Rayloc Drive Atlanta, Fulton County, Georgia	NTS
Map Date: 10/31/2012		 Sage Environmental Consulting, L.P. 600 Chastain Road, Suite 320 Kennesaw, Georgia 30144	
Project No.: 1221-1-2	JAW		

Figure 2 Site Aerial Map





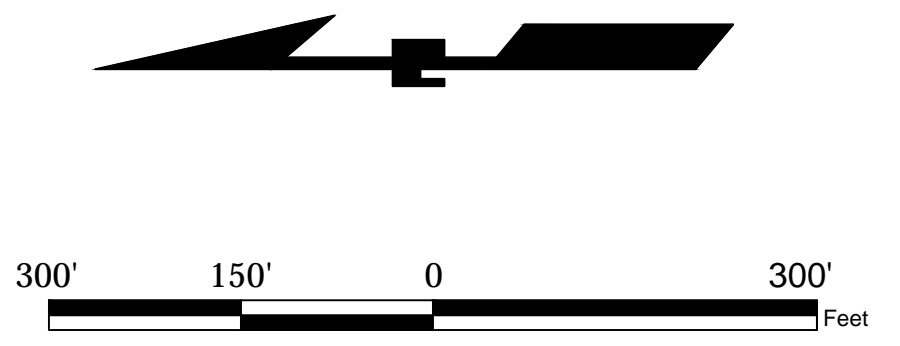
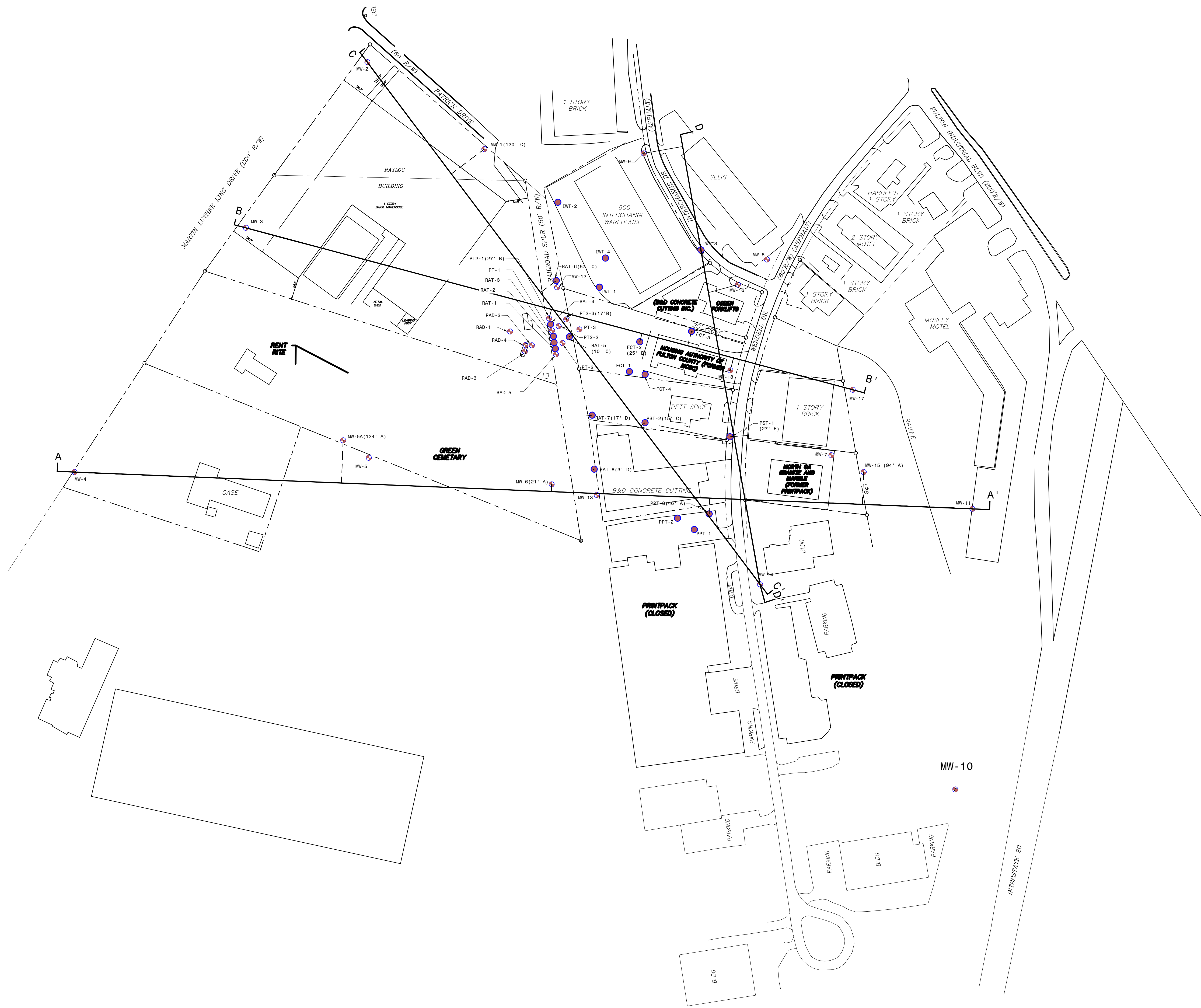
Legend		Figure 2 – Site Aerial Map	Scale
Map Source: Google Earth		Rayloc Facility 600 Rayloc Drive Atlanta, Fulton County, Georgia	NTS
Map Date: 10-31-2012		 Sage Environmental Consulting, L.P. 600 Chastain Road, Suite 320 Kennesaw, Georgia 30144	
Project No.: 1221-1-2	DA		

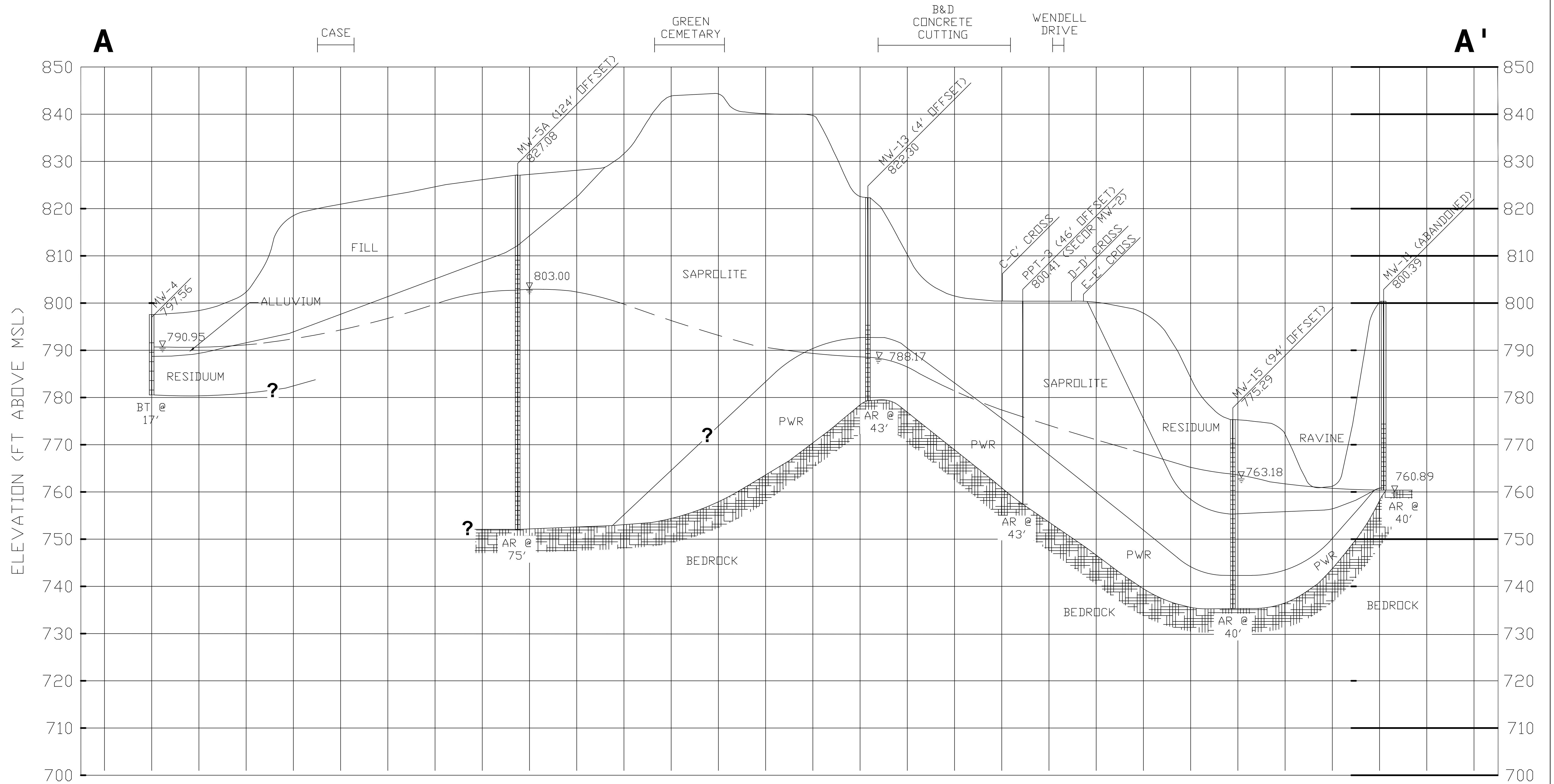
Figure 3 Cross Section Base Map



Drawing:	Cross Sections.DWG	FIGURE 3
Revision #:	0	CROSS SECTION BASE MAP
Date:	06 /20 / 2013	RAYLOC FACILITY
Project #:	1221-1-2-1-1	ATLANTA, GEORGIA

Cross Sections.dwg

Figure 4 Cross Section A-A'



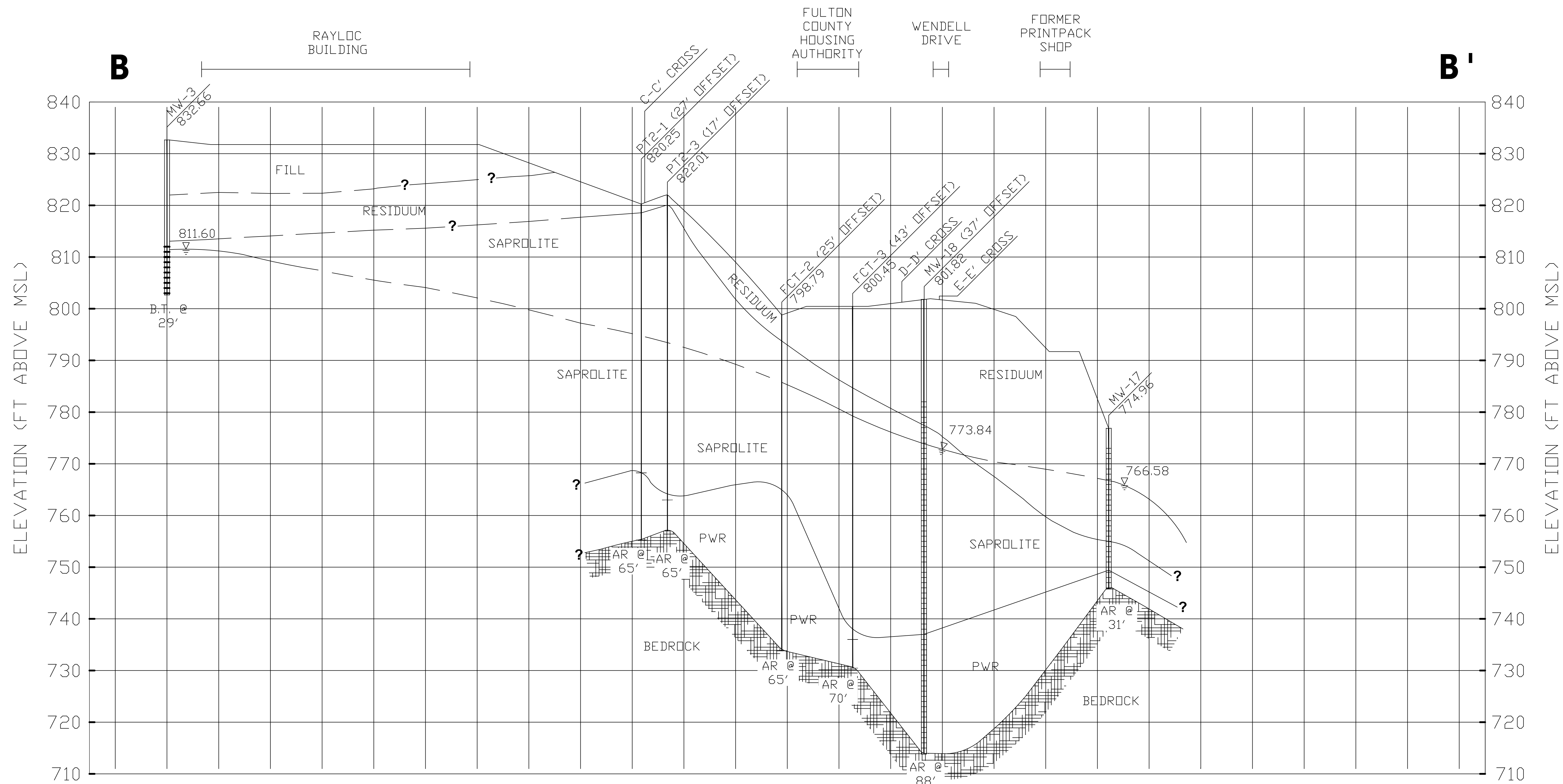
HORIZONTAL SCALE: 1"=100'
 VERTICAL SCALE: 1"=10'



Drawing: Cross Sections.DWG	FIGURE 4
Revision #: 0	CROSS SECTION A-A'
Date: 06 /20 / 2013	RAYLOC FACILITY
Project #: 1221-1-2-1-1	ATLANTA, GEORGIA

Cross Sections.dwg

Figure 5 Cross Section B-B'



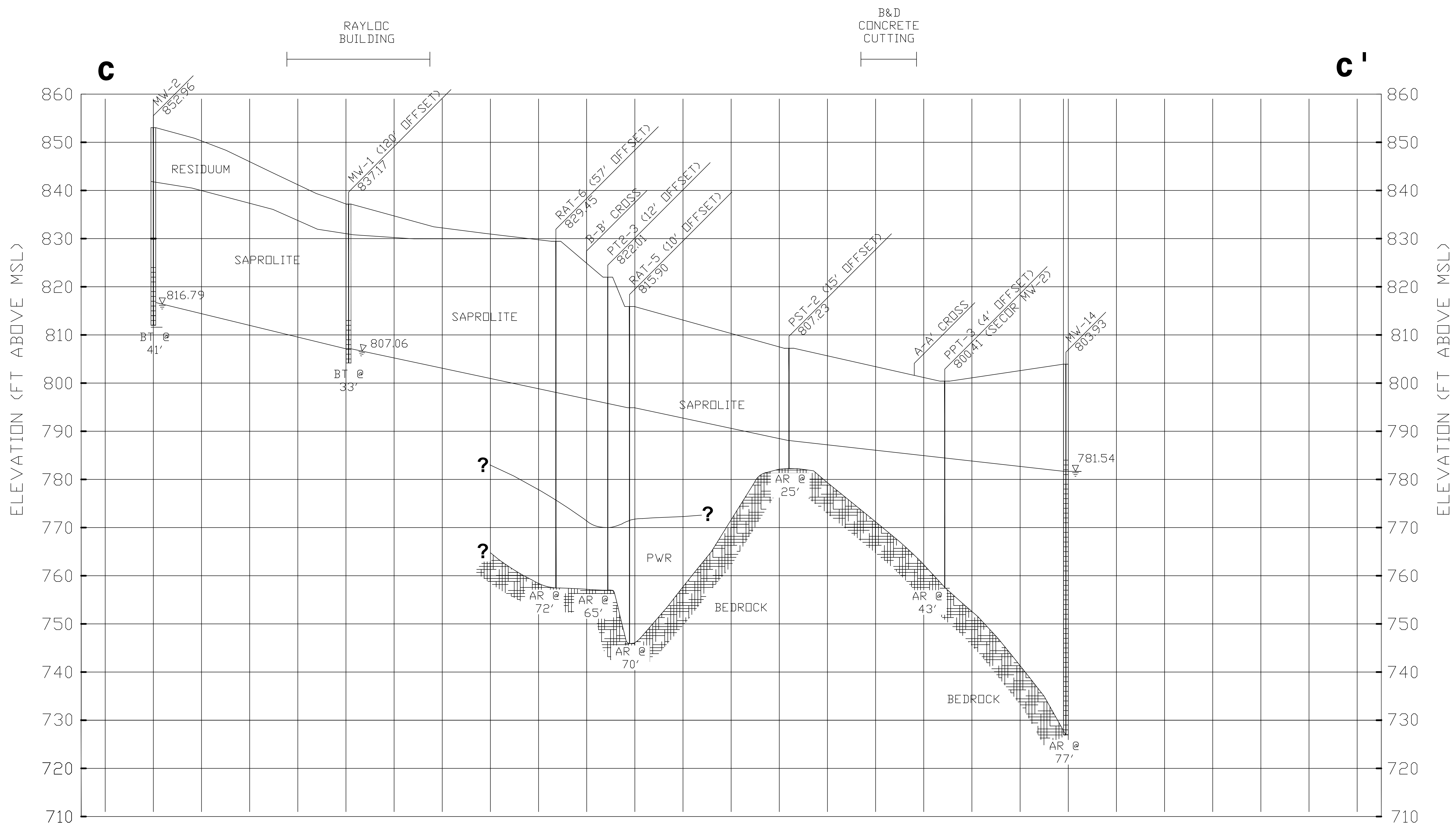
HORIZONTAL SCALE: 1"=100'
 VERTICAL SCALE: 1"=10'



Drawing: Cross Sections.DWG	FIGURE 5
Revision #: 0	CROSS SECTION B-B'
Date: 06 /20 / 2013	RAYLOC FACILITY
Project #: 1221-1-2-1-1	ATLANTA, GEORGIA

Cross Sections.dwg

Figure 6 Cross Section C-C'



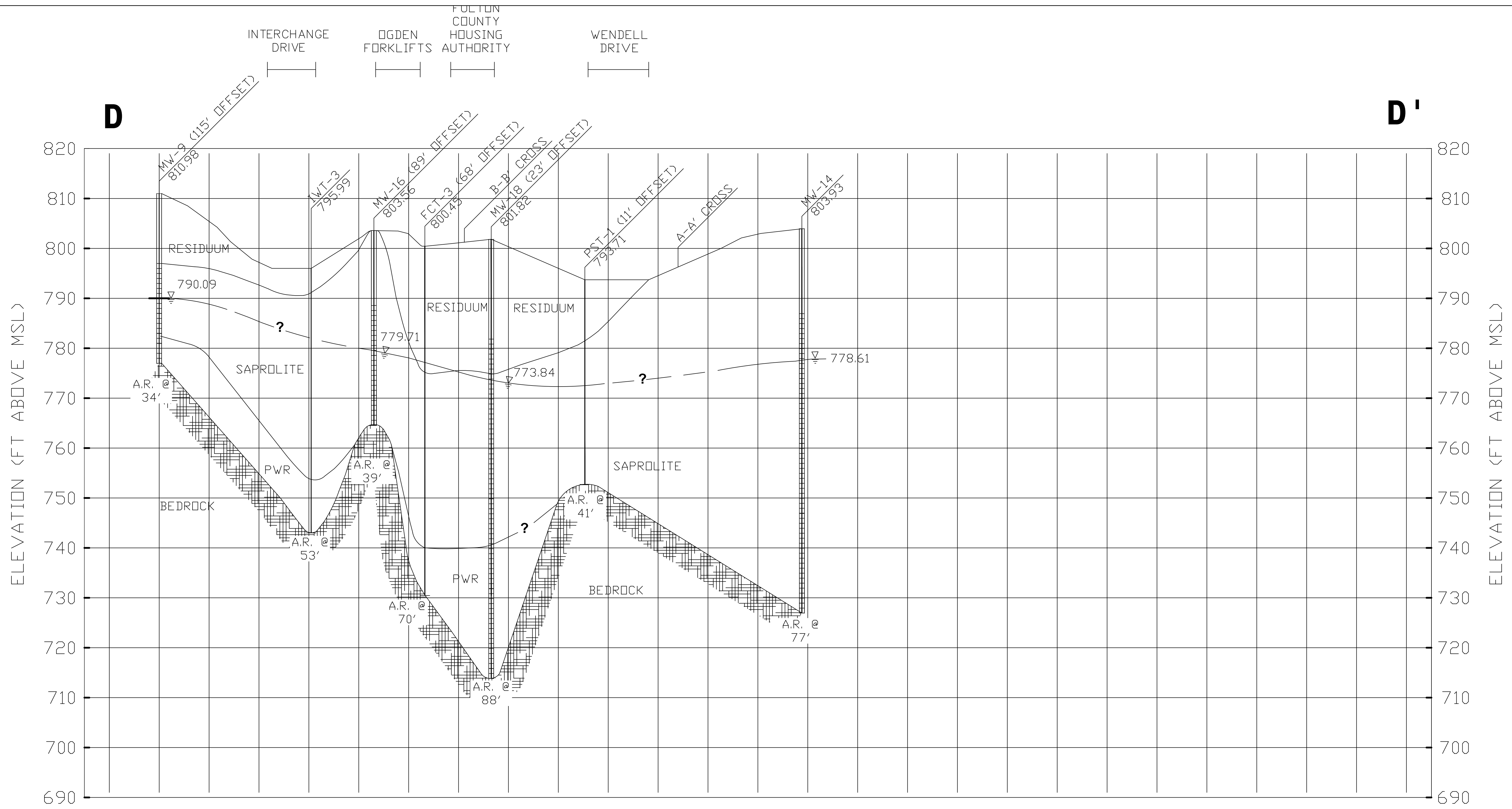
HORIZONTAL SCALE: 1"=100'
VERTICAL SCALE: 1"=10'

Cross Sections.dwg



Drawing: Cross Sections.DWG	FIGURE 6
Revision #: 0	CROSS SECTION C-C'
Date: 06 /20 / 2013	RAYLOC FACILITY
Project #: 1221-1-2-1-1	ATLANTA, GEORGIA

Figure 7 Cross Section D-D'



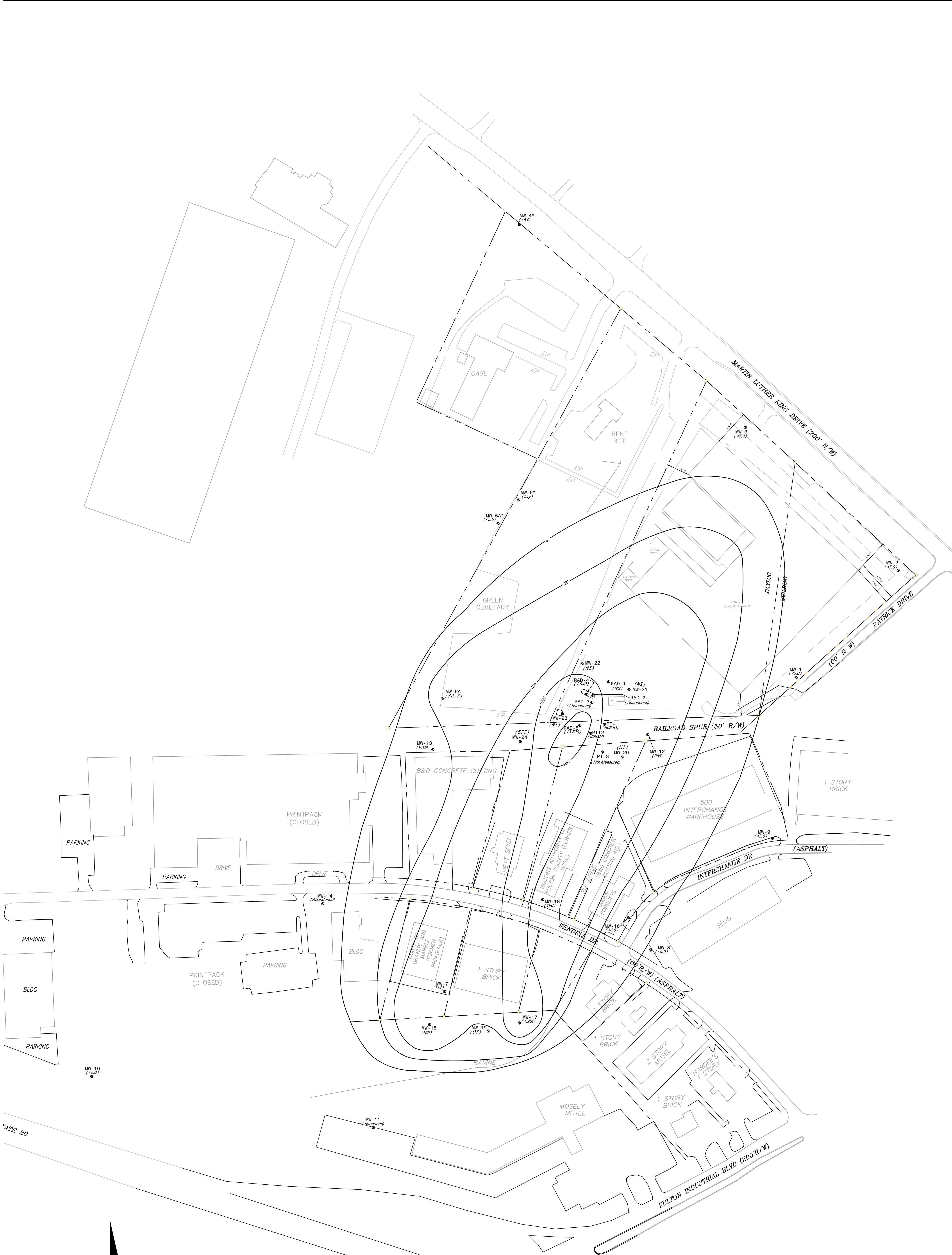
HORIZONTAL SCALE: 1"=100'
VERTICAL SCALE: 1"=10'



Drawing: Cross Sections.DWG	FIGURE 7
Revision #: 0	CROSS SECTION D-D'
Date: 06 /20 /2013	RAYLOC FACILITY
Project #: 1221-1-2-1-1	ATLANTA, GEORGIA

Cross Sections.dwg

Figure 8 Potentiometric Surface Map (November 2012)



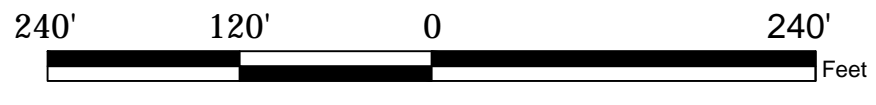
PCE Concentrations in micrograms per liter

- | | |
|----------|------------------------------------|
| NS | LEGEND |
| NI | Not Sampled |
| • | Not Installed |
| • | Monitoring Well Location |
| • | Indicates Readings from March 2013 |
| ~ | Groundwater Contour with Elevation |
| (763.18) | Groundwater Elevation |
| --- | Property Line |



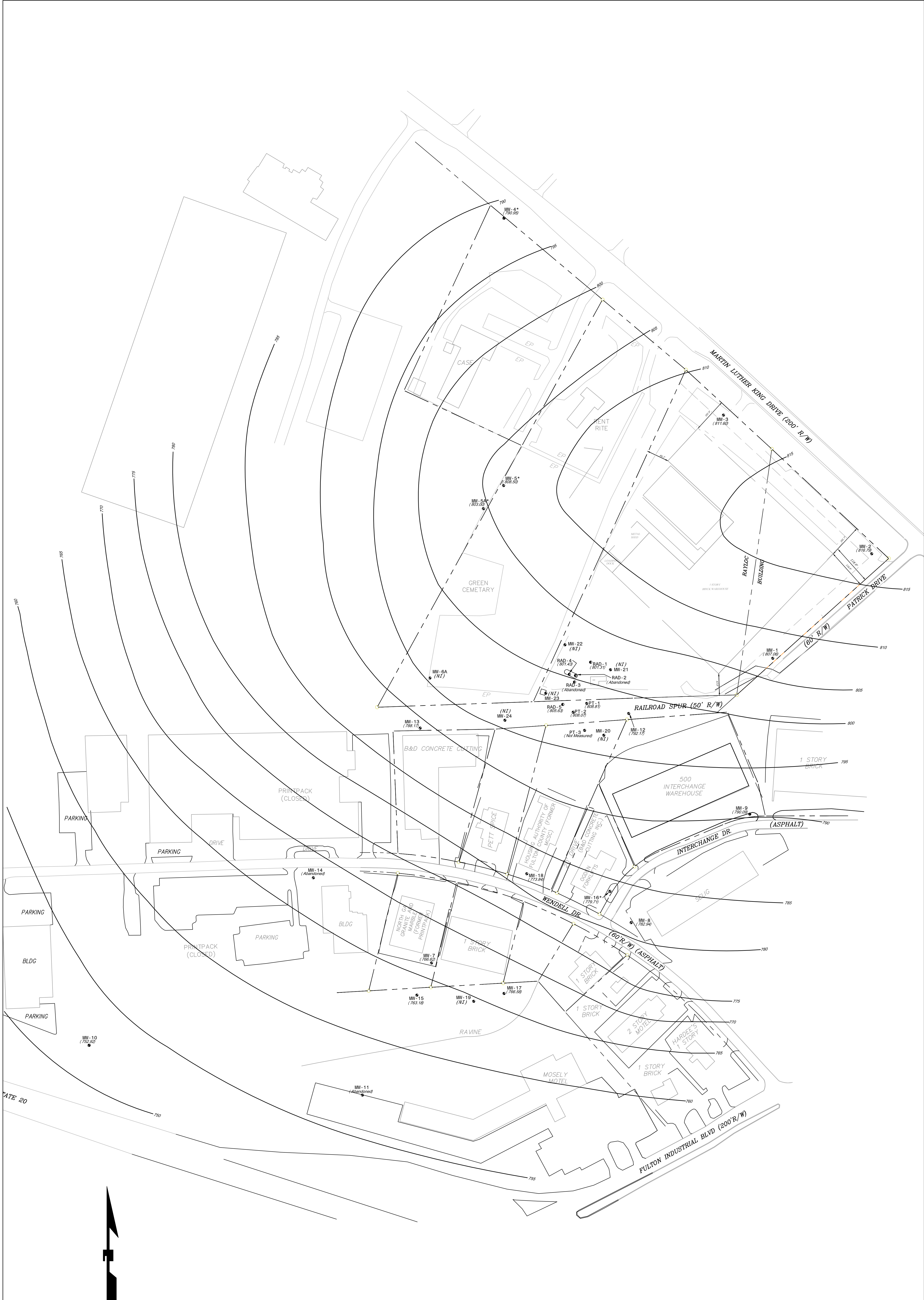
Drawing:	1221-1-2-1-1 GPC.DWG
Revision #:	0
Date:	06 / 27 / 2013
Project #:	1221-1-2

FIGURE 8
PCE ISOCONCENTRATION MAP
RAYLOC FACILITY
MARCH 2013



1221-1-2-1-1 GPC.dwg

Figure 9 PCE Isoconcentration Map (January/March 2013)



1221-1-2-1-1 CPC.dwg

SAGE
ENVIRONMENTAL CONSULTING

Drawing:	1221-1-2-1-1 GPC.DWG
Revision #:	0
Date:	06 /15/ 2013
Project #:	1221-1-2

FIGURE 9
POTENTIOMETRIC SURFACE MAP
RAYLOC FACILITY
MARCH 2013

NI • Not Installed
 • Monitoring Well Location
 • Indicates Readings from March 2013
 ~ Groundwater Contour with Elevation
 - Groundwater Elevation
 - Property Line

APPENDIX A

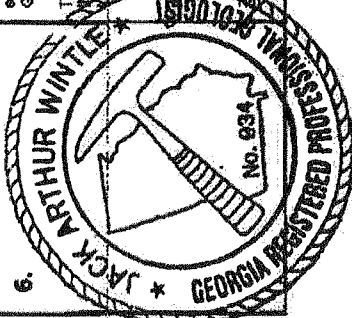
VOLUNTARY REMEDIATION PROGRAM

APPLICATION FORM

Voluntary Investigation and Remediation Plan Application Form and Checklist

VRP APPLICANT INFORMATION			
COMPANY NAME	Genuine Parts Company		
CONTACT PERSON/TITLE	Robert Lewis, Environmental Manager		
ADDRESS	2999 Circle 75 Parkway, Atlanta, GA 30339		
PHONE	770-858-2564	FAX	770-858-2642
		E-MAIL	bob_lewis@gentp.com
GEORGIA CERTIFIED PROFESSIONAL GEOLOGIST OR PROFESSIONAL ENGINEER OVERSEEING CLEANUP			
NAME	Jack Wintle	GA PE/PG NUMBER	834
COMPANY	Oasis Environmental Services		
ADDRESS	45 Woodstock Street, Roswell, GA 30075		
PHONE	678-739-2400	FAX	770-552-5560
		E-MAIL	jwintle@oasis-cs.com
APPLICANT'S CERTIFICATION			
<p>In order to be considered a qualifying property for the VRP:</p> <p>(1) The property must have a release of regulated substances into the environment;</p> <p>(2) The property shall not be:</p> <p>(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.</p> <p>(B) Currently undergoing response activities required by an order of the regional administrator of the federal Environmental Protection Agency; or</p> <p>(C) A facility required to have a permit under Code Section 12-8-86.</p> <p>(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.</p> <p>(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.</p> <p>In order to be considered a participant under the VRP:</p> <p>(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.</p> <p>(2) The participant must not be in violation of any order, judgment, statute, rule, or regulation subject to the enforcement authority of the director.</p> <p>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.</p> <p>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.</p>			
APPLICANT'S SIGNATURE	<i>Robert M. Lewis</i>		
APPLICANT'S NAME/TITLE (PRINT)	Robert M. Lewis, Environmental Manager		DATE
			1/7/13

* QUALIFYING PROPERTY INFORMATION (For additional qualifying properties, please refer to the last page of application form)			
HAZARDOUS SITE INVENTORY INFORMATION (if applicable)			
HSI Number	10547	Date HSI Site listed	6/11/99
HSI Facility Name	Rayloc Facility	NAICS CODE	
PROPERTY INFORMATION			
TAX PARCEL ID	14F-0063-LL-008-5	PROPERTY SIZE (ACRES)	10.34
PROPERTY ADDRESS	800 Rayloc Drive	COUNTY	Fulton
CITY	Allanta	ZIP CODE	30336
STATE	GA	LONGITUDE (decimal format)	84.524722
LATITUDE (decimal format)	33.771667	PROPERTY OWNER INFORMATION	
PROPERTY OWNER(S)	LRL Holdings	PHONE #	281-461-0613
MAILING ADDRESS	15506 Driftwood Oak Court	STATE/ZIP CODE	TX 77059
CITY	Houston	Location in VRP (i.e. pg., Table #, Figure #, etc.)	
ITEM #	DESCRIPTION OF REQUIREMENT	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.)		
2.	WARRANTY DEED(S) FOR QUALIFYING PROPERTY.		
3.	TAX PLAT OR OTHER FIGURE INCLUDING QUALIFYING PROPERTY BOUNDARIES, ABUTTING PROPERTIES, AND TAX PARCEL IDENTIFICATION NUMBER(S).		
4.	ONE (1) PAPER COPY AND TWO (2) COMPACT DISC (CD) COPIES OF THE VOLUNTARY REMEDIATION PLAN IN A SEARCHABLE PORTABLE DOCUMENT FORMAT (PDF). 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-annual status report to the director describing implementation of the plan		
5.			

	<p>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>	
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>	
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>	
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>	
	<p>SIGNED AND SEALED PEIPG 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 12-9-10, 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 submission 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 providing, indicating,</p>	<p>6.</p>  <p>Jack A. Wintler #934 1/7/2013 Signature: <i>Jack A. Wintler</i> Title: <i>Professional Engineer</i></p>

GEORGIA, FULTON COUNTY

THIS INDENTURE, made and entered into this 6th day of April, 1960, between FULTON COUNTY, a political subdivision of Georgia, of the first part, and GENUINE PARTS COMPANY, a Georgia corporation of Fulton County, Georgia, of the second part,

W I T N E S S E T H:

That for and in consideration of the sum of THIRTEEN THOUSAND THREE HUNDRED TWENTY (\$13,320.00) DOLLARS, receipt whereof is hereby acknowledged, Fulton County has bargained, sold and conveyed, and by these presents does bargain, sell and convey unto Genuine Parts Company, its successors and assigns, the following described property, to wit:

All that tract or parcel of land lying and being in Land Lot 22 of the 14th District of formerly Fayette, now Fulton County, Georgia, more particularly described as follows:

BEGINNING at a monument at the southwest corner of said Land Lot 22; running thence north 01 degree 50 minutes east along the west line of said Land Lot 22, 722.2 feet to an iron pin on the southwestern line of the right-of-way of Gordon Road, the right-of-way of Gordon Road having a width of 200 feet; thence south 53 degrees 55 minutes east along the southwestern line of the right-of-way of Gordon Road 472.1 feet to an iron pin at the corner formed by the intersection of the southwestern line of the right-of-way of Gordon Road with the northwestern line of the right-of-way of proposed Patrick Drive, said proposed Patrick Drive to have a width of 60 feet; thence south 42 degrees 13 minutes west along the northwestern right-of-way line of proposed Patrick Drive 599.3 feet to the monument at the point of beginning, as more particularly shown on plat of survey designated "Plan of Property Located in Land Lot 22 - 14th F. F. District, Fulton Co., Georgia" by Joe W. Arnold, III, Engineer & Surveyor, dated March 22, 1960.

TO HAVE AND TO HOLD said described property unto the said Genuine Parts Company, its successors and assigns, forever in Fee Simple, subject to the restrictions and conditions hereinafter set forth.

And Fulton County, for itself, its successors and assigns will warrant and forever defend the right and title to the said described property unto the said Genuine Parts Company, its successors and assigns, against the claims of all persons whomsoever.

The above described property is sold subject to the following terms and conditions which are a covenant running with the land and subject to be released only with the consent of Fulton County, given under seal, said terms and conditions thus imposed upon said described property are as follows:

SET-BACK AND SIDE YARD

1. Structures fronting on Industrial Boulevard must be located at least 100 feet from front property line; structure fronting or adjoining any other street must be located at least 40 feet from the front property lines.
2. Structures must be at least 25 feet from any side line; except in Tract 10, where structures must be at least 15 feet from any side line.
3. Only driveways, parking spaces, and landscaped areas shall be permitted in area between structure and front property line.

BUILDINGS

1. Outside walls of all main buildings will be of masonry construction, its equivalent, or better.
2. The front of all main buildings will be constructed of face brick, its equivalent, or better, and no concrete block shall be exposed in the front, but can be used for veneer purposes.
3. No wood siding will be permitted.
4. Accessory buildings shall not be located nearer the street than the rear of the main building.
5. Loading docks shall not be on the front of the main building.

PARKING AND MANEUVERING

1. No parking will be permitted on streets and highways.
2. Parking spaces and truck docks shall be so located that maneuvering in streets or highways will not be necessary.

3. Ample parking spaces shall be supplied for personnel, visitors, and company vehicles, subject to the zoning laws of Fulton County.

4. Parking spaces and driveways shall be paved with concrete, asphalt, their equivalent, or better.

OUTSIDE STORAGE

1. No outside storage will be permitted on the front of the property nor within 25 feet of any property line.

2. Outside storage areas must be enclosed by a chain-link fence at least 4 feet in height, its equivalent, or better.

NUISANCE ABATEMENT

1. Accepted smoke and odor abatement practice shall be followed to eliminate all smoke and objectionable odors.

2. Noise suppression devices shall be used where usual operating noise can be heard more than 150 feet beyond the property lines.

INDUSTRIAL WASTE

1. All water-borne industrial wastes which cannot be treated properly in the sanitary sewage treatment plant shall be the responsibility of the industry to treat properly before discharging into the river, in conformity with requirements of the Georgia State Department of Health.

RAILROADS

1. All railroad engines operating in the District shall be diesels with smoke abatement devices.

SIGNS

1. No billboards shall be permitted.

2. Signs erected between the main building and the street shall not exceed the following dimensions:

- (a) Identifying Signs: 15 Square Feet
- (b) Directional Signs: 2 Square Feet

3. Elevated signs (atop structures) shall not exceed two hundred (200) Square Feet.

4. All signs must be in keeping with the general character of development.

MISCELLANEOUS

1. All site plans and building plans and specifications

1669771

BOOK 3558 PAGE 767

shall be submitted to the County Building Inspector for approval.

2. Exceptions to any of the above restrictions may be granted by the Building Inspector and by obtaining written approval from the owners of adjoining property and subject to approval by Fulton County Commissioners.

3. These restrictions shall not apply after January 1, 2008, unless at any time the owners of a majority of the area in Fulton Industrial District, by written declaration signed and acknowledged by them and recorded in the deed records of Fulton County, Georgia, shall alter, or extend these restrictions.

4. Where these restrictions are more restrictive than municipal building and zoning regulations, these restrictions shall apply. Where these restrictions are less restrictive than municipal building and zoning regulations the municipal regulations shall apply.

5. Development of any area for public buildings is reserved.

Said property is sold likewise subject to the following condition and right of reversion, namely: Should the grantee herein, or its successors, or assigns, fail to improve said property with a permanent improvement constructed thereon in conformity with the restrictions herein imposed, within a period of five (5) years from the date hereof, Fulton County shall have the right and option to repurchase same from the owner thereof for the sum of Thirteen Thousand Three Hundred Twenty (\$13,320.00) Dollars, without interest, which right to repurchase, in the event of failure of the grantee herein, its successors or assigns, to use said property, is a covenant running with the land, which is occasioned by the desire of Fulton County that said property should be developed for industrial or commercial purposes in conformity with the general plan for the development of the property of Fulton County adjacent to and in the vicinity of said described property.

IN WITNESS WHEREOF, Fulton County has caused its name and seal to be affixed hereunto by its Chairman, on the day and year first above written, pursuant to a resolution of the County Commission,

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duly entered upon the Minutes of the County Commission.

FULTON COUNTY

By Jackie Lindsay (SEAL)
Chairman, Commissioners of Roads
and Revenues

Signed, sealed and delivered
in the presence of:

Frank J. O'Neil

Marie S. Sillars

Notary Public, Georgia
My Commission Expires Feb. 15, 1961



APPROVED AS TO FORM:

W. W. ...
County Attorney



FILED
FULTON CO., GA.
APR 6 1 51 PM '60

W. W. ...
CLERK, SUPERIOR COURT

RECORDED
APR 8 '60

W. W. ...
CLERK, SUPERIOR COURT



STATE OFFICE
TITLE BUILDING
ATLANTA, GEORGIA

1664888

Lawyers Title Insurance Corporation

ATLANTA BRANCH OFFICE

WARRANTY DEED

STATE OF GEORGIA, COUNTY OF FULTON.

THIS INDENTURE, Made the 25th day of February, in the year one thousand nine hundred and sixty, between

CHARLES HAGGARD, INDIVIDUALLY, AND AS EXECUTOR UNDER THE WILL OF MRS. ELIZABETH LOWE HAGGARD, DECEASED

of the County of _____, and State of Georgia, as party or parties of the first part, hereinafter called Grantor, and GENUINE PARTS COMPANY, a corporation of Fulton County, Georgia,

as party or parties of the second part, hereinafter called Grantee (the words "Grantor" and "Grantee" to include their respective heirs, successors and assigns where the context requires or permits).

WITNESSETH that: Grantor, for and in consideration of the sum of TEN (\$10.00) DOLLARS AND OTHER VALUABLE CONSIDERATION * ~~XXXXXXXXXX~~ in hand paid at and before the sealing and delivery of these presents, the receipt whereof is hereby acknowledged, has granted, bargained, sold, aliened, conveyed and confirmed, and by these presents does grant, bargain, sell, alien, convey and confirm unto the said Grantee,

All that tract or parcel of land lying and being in Land Lot 53 of the 14th District of that portion of Fulton County, Georgia, which was formerly Fayette County, and more particularly described as follows:

BEGINNING at the southeast corner of said Land Lot 53, and running thence north 6 degrees 56 minutes east along the east line of said Land Lot 53, a distance of 723 feet to a point on the south right of way of Gordon Road (otherwise known as River Road) thence northwesterly along the right-of-way of Gordon Road, otherwise known as River Road, 350 feet to a point; thence south 23 degrees 30 minutes west, a distance of 1071.7 feet to a point on the south line of said Land Lot 53; thence north 86 degrees 30 minutes east, along the south line of said Land Lot 53, a distance of 608 feet to the southeast corner of said Land Lot and the point of beginning; containing 9.10 acres.

Mrs. Elizabeth Lowe Haggard formerly owned the above described property and died leaving a will in Cobb County, Georgia, said will dated February 17, 1938, which was probated in solemn form on July 6, 1953, recorded in Will Book 6, page 51, Cobb County Records. Letters testamentary were issued to Charles Haggard on July 6, 1953. The will devised all real property of the deceased to Charles Haggard, her husband, and appoints him as executor and contains following provision: "and I hereby expressly confirm upon him as such executor full power and authority to administer my estate in such manner as to him may seem wise and proper". This deed is executed by the said Charles Haggard, individually, and also as Executor under the Will of Elizabeth Lowe Haggard for the purpose of expressing his consent to the passing of the devise as an individual, all debts due by the said estate of the said Elizabeth Lowe Haggard, having been heretofore fully paid.

RECORDED

Mar 2 '60



J. H. Aldridge
CLERK, SUPERIOR COURT

TO HAVE AND TO HOLD the said tract or parcel of land, with all and singular the rights, members and appurtenances thereof, to the same being, belonging, or in anywise appertaining, to the only proper use, benefit and behoof of the said Grantee forever in FEE SIMPLE.

AND THE SAID Grantor will warrant and forever defend the right and title to the above described property unto the said Grantee against the claims of all persons whomsoever.

IN WITNESS WHEREOF, the Grantor has signed and sealed this deed, the day and year above written.

Signed, sealed and delivered in presence of:

Jas. H. Aldridge
Witness
Kay P. Cartledge
Notary Public

Charles Haggard
Charles Haggard, Individually, and
as Executor as aforesaid. *(Seal)*
CLERK, SUPERIOR COURT
(Seal)

FILED
FULTON CO., GA.

FEB 29 3 46 PM '60



Notary Public, Georgia State of Large
My Commission Expires Mar 5, 1960

1664888

WARRANTY DEED

FROM
Charles Haggard, individually,
and as Executor

TO

Genuine Parts Company

GEORGIA, *Fulton* County.

Clerk's Office, Superior Court

Filed for Record *33* day

of *February* 19*60*,

at *11:27* M., and Recorded in Deed

Book *3579* Folio *615*

MAR 2 1960 19

W. S. ... Clerk

Lawyers Title
Insurance Corporation

ATLANTA BRANCH OFFICE

TITLE BUILDING

ATLANTA, GEORGIA

STATE OF GEORGIA

COUNTY OF COB

THIS DEED PREPARED BY AND RETURN TO:

Foltz Martin Hudson & Knapp, LLC
3525 Piedmont Road NE, Five Piedmont Center,
Suite 750
Atlanta, Georgia 30305

LIMITED WARRANTY DEED

THIS DEED made this ___ day of December, 2012, between **GENUINE PARTS COMPANY, a Georgia limited liability company ("Grantor")** and **LRL HOLDINGS GEORGIA, LLC, a Georgia limited liability company ("Grantee")** (the terms Grantor and Grantee to include their respective heirs, successors and assigns, where the context hereof requires or permits).

WITNESSETH THAT: Grantor, for and in consideration of the sum of Ten and 00/100ths Dollars (\$10.00) and other good and valuable consideration, in hand paid at and before the sealing and delivery of these presents, the receipt, adequacy and sufficiency of which being hereby acknowledged by Grantor has granted, bargained, sold and conveyed, and by these presents does hereby grant, bargain, sell and convey unto Grantee, the following described real property, to wit:

ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOTS 22 AND 53 OF THE 14TH (FORMERLY FAYETTE) DISTRICT FULTON COUNTY, GEORGIA AND BEING MORE PARTICULARLY DESCRIBED ON ATTACHED EXHIBIT "A", WHICH BY REFERENCE IS INCORPORATED HEREIN.

This property has been listed on the state's hazardous site inventory and has been designated as needing corrective action due to the presence of hazardous wastes, hazardous constituents, or hazardous substances regulated under state law. Contact the property owner or the Georgia Environmental Protection Division for further information concerning this property. This notice is provided in compliance with the Georgia Hazardous Site Response Act.

TO HAVE AND TO HOLD the above described tract or parcel of land, together with all and singular the rights, members and appurtenances thereof, to the same being, belonging, or in anywise appertaining, to the only proper use, benefit and behoof of Grantee, forever, in **FEE SIMPLE.**

AND, SUBJECT TO the title matters expressly set forth on Exhibit "B", if any, Grantor will warrant and forever defend the right and title to the above-described tract or parcel of land unto the Grantee against the claims by, under or through Grantor.

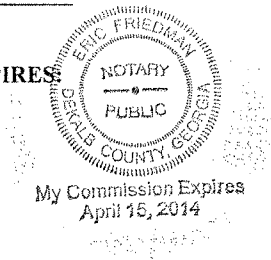
IN WITNESS WHEREOF, Grantor has signed and sealed this Deed the day and year first above written.

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF:

Karl Koening
UNOFFICIAL WITNESS

NOTARY PUBLIC

MY COMMISSION EXPIRES:



GENUINE PARTS COMPANY,
a Georgia limited liability company

By: Scott C. Smith
Scott C. Smith

Its: Senior Vice President

Exhibit "A"

Tract I

All that tract or parcel of land lying and being in Land Lot 53 of the 14th District of that portion of Fulton County, Georgia, which was formerly Fayette County, and more particularly described as follows:

Beginning at the southeast corner of said Land Lot 53, and running thence north 6 degrees 56 minutes east along the east line of said Land Lot 53, a distance of 723 feet to a point on the south right of way of Gordon Road (otherwise known as River Road) thence northwesterly along the right-of-way of Gordon Road, otherwise known as River Road, 350 feet to a point; thence south 23 degrees 30 minutes west, a distance of 1071.7 feet to a point on the south line of said Land Lot 53; thence north 86 degrees 30 minutes east, along the south line of said Land Lot 53, a distance of 608 feet to the southeast corner of said Land Lot and the point of beginning; containing 9.10 acres.

Tract II

All that tract or parcel of land lying and being in Land Lot 22 of the 14th District of formerly Fayette, now Fulton County, Georgia, more particularly described as follows:

BEGINNING at a monument at the southwest corner of said Land Lot 22; running thence north 01 degree 50 minutes east along the west line of said Land Lot 22, 722.2 feet to an iron pin on the southwestern line of the right-of-way of Gordon Road, the right-of-way of Gordon Road having a width of 200 feet; thence south 53 degrees 55 minutes east along the southwestern line of the right-of-way of Gordon Road 472.1 feet to an iron pin at the corner formed by the intersection of the southwestern line of the right-of-way of Gordon Road with the northwestern line of the right-of-way of proposed Patrick Drive, said proposed Patrick Drive to have a width of 60 feet; thence south 42 degrees 13 minutes west along the northwestern right-of-way line of proposed Patrick Drive 599.3 feet to the monument at the point of beginning, as more particularly shown on plat of survey designated "Plan of Property Located in Land Lot 22-14th F.F. District, Fulton Co., Georgia" by Joe W. Arnold, III, Engineer & Surveyor, dated March 22, 1960.

Exhibit "B"
Permitted Exceptions

Taxes and assessments for the year 2013 and subsequent years, not yet due and payable.

Georgia Power Easement dated August 10, 1960 from Genuine Parts Company recorded in Deed Book 3621, Page 781, Fulton County, Georgia records.

Georgia Power Easement dated September 13, 1965 from Genuine Parts Company recorded in Deed Book 4489, Page 522, aforesaid records.

Georgia Power Easement dated June 27, 1946 from Fulton County recorded in Deed Book 1258, Page 359, aforesaid records.

25 Foot drive easement described in Easement dated November 24, 1961 by Genuine Auto Parts recorded in Deed Book 3811, Page 171, aforesaid records.

American Telephone and Telegraph Company Easement dated June 2, 1944, recorded in Deed Book 1953, Page 285, aforesaid records.

American Telephone and Telegraph Company Easement dated April 9, 1944 from Mrs. Elizabeth Lowe Haggard recorded in Deed Book 1991, Page 384, aforesaid records; with Amendment dated December 23, 1944, recorded in Deed book 1996, Page 52, aforesaid records.

Those restrictions contained in that certain Deed dated April 6, 1960 from Fulton County to Genuine Parts Company, recorded in Deed Book 3558, Page 764, aforesaid records (affecting Tract II only), if applicable.

STATE OF GEORGIA

COUNTY OF COBB

THIS DEED PREPARED BY AND RETURN TO:

Foltz Martin Hudson & Knapp, LLC
3525 Piedmont Road NE, Five Piedmont Center,
Suite 750
Atlanta, Georgia 30305

QUITCLAIM DEED

THIS DEED made this ___ day of December 2012, between **GENUINE PARTS COMPANY, a Georgia corporation** ("Grantor") and **LRL HOLDINGS GEORGIA, LLC, a Georgia limited liability company** ("Grantee") (the terms Grantor and Grantee to include their respective heirs, successors and assigns, where the context hereof requires or permits).

That the said Grantor, for and in consideration of the sum of One Dollar (\$1.00) and other valuable consideration, cash in hand paid, the receipt of which is hereby acknowledged, has bargained, sold, and does by these presents bargain, sell, remise, release, and forever quit-claim to the said Grantee, all the right, title, interest, claim or demand which the said Grantor has or may have had in and to the following described property:

ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOTS 22 AND 53 OF THE 14TH (FORMERLY FAYETTE) DISTRICT FULTON COUNTY, GEORGIA AND BEING MORE PARTICULARLY DESCRIBED ON ATTACHED EXHIBIT "A", WHICH BY REFERENCE IS INCORPORATED HEREIN.

with all the rights, members and appurtenances to the said described premises in anywise appertaining or belonging.

This property has been listed on the state's hazardous site inventory and has been designated as needing corrective action due to the presence of hazardous wastes, hazardous constituents, or hazardous substances regulated under state law. Contact the property owner or the Georgia Environmental Protection Division for further information concerning this property. This notice is provided in compliance with the Georgia Hazardous Site Response Act.

TO HAVE AND TO HOLD the said described premises unto the said Grantee, so that neither the said Grantor, nor any other person or persons claiming under Grantor shall at any time, claim or demand any right, title or interest to the aforesaid described premises or its appurtenances.

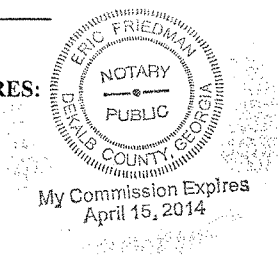
IN WITNESS WHEREOF, Grantor has signed and sealed this Deed the day and year first above written.

**SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF:**

Katie Hoch
UNOFFICIAL WITNESS

[Signature]
NOTARY PUBLIC

MY COMMISSION EXPIRES:



**GENUINE PARTS COMPANY
a Georgia corporation**

By: [Signature]
Scott C. Smith

Its: Senior Vice President

Exhibit "A"

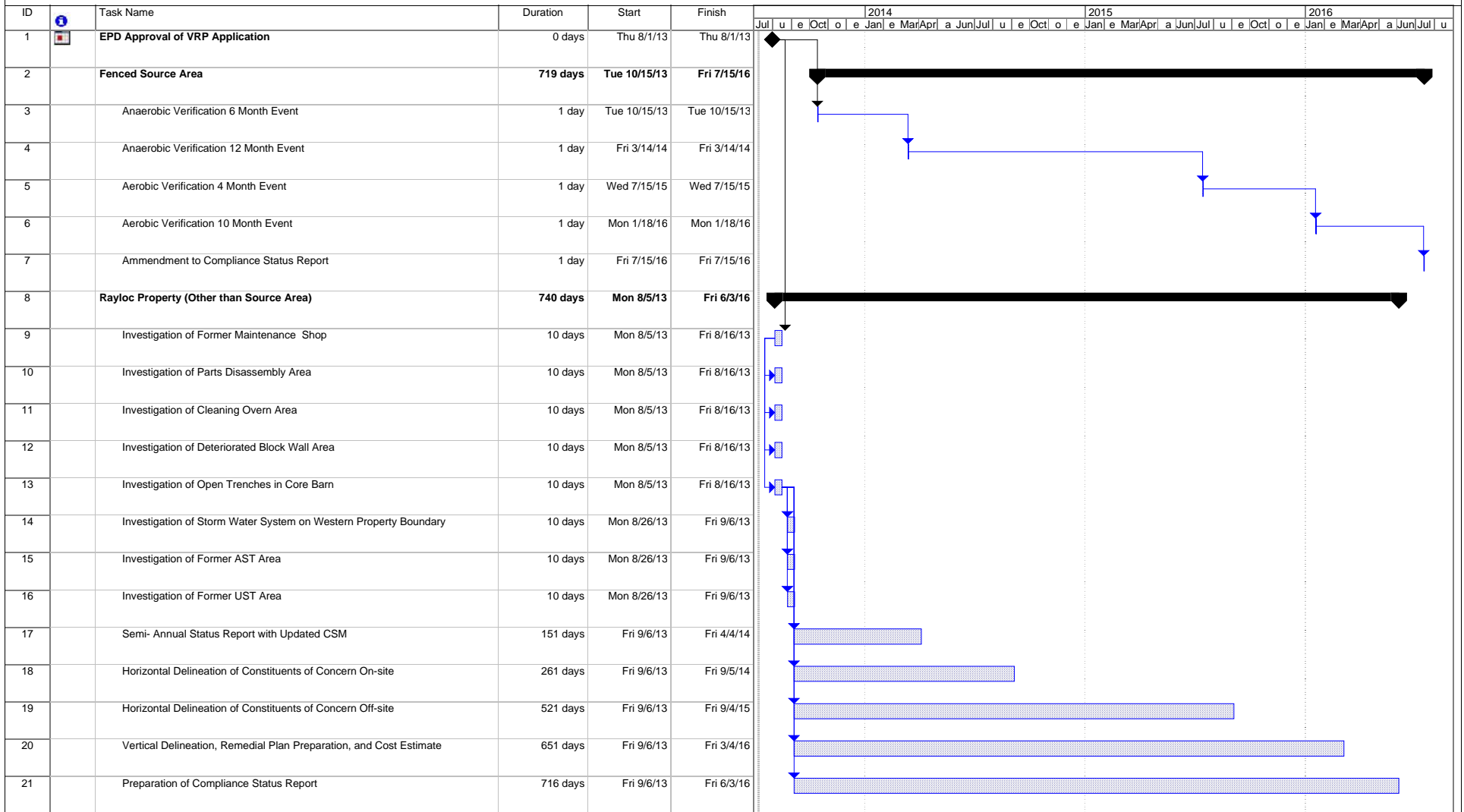
All that tract or parcel of land lying and being in Land Lots 22 and 53, 14th F.F. (Formerly Fayette) District of Fulton County, State of Georgia, and being more particularly described as follows:

Beginning at a concrete monument at the corner common to Land Lots 22, 23, 52 and 53, said point being the POINT OF BEGINNING. Thence along a railroad spur (50 foot right of way) and the southerly line of Land Lot 53 South 89 degrees 56 minutes 19 seconds West, a distance of 597.76 feet to a 5/8 inch rebar with cap; thence leaving said railroad spur and land lot line along the lands of Rent Rite Holding Company North 26 degrees 36 minutes 02 seconds East, a distance of 1,072.46 feet to 1/2 inch rebar on the southerly right of way of Martin Luther King Drive (200 foot right of way); thence along said right of way South 45 degrees 11 minutes 48 seconds East, a distance of 813.18 feet to a 5/8 inch rebar with cap at the intersection of the southerly right of way of Martin Luther King Drive with the westerly right of way of Rayloc Drive (60 foot right of way); thence along the right of way of Rayloc Drive South 50 degrees 01 minutes 04 seconds West, a distance of 599.59 feet to a concrete monument said point being the POINT OF BEGINNING.

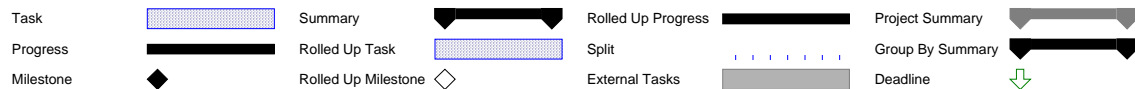
Said tract or parcel containing 529,232 square feet or 12.15 acres, more or less.

**APPENDIX B
SCHEDULE**

Voluntary Remediation Plan
 Project Milestone Schedule
 Ralyoc Facility
 Atlanta, Fulton County, Georgia
 HSI # 10547



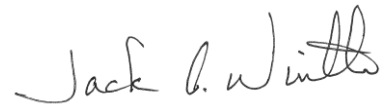
Project: VRP Project Schedule
 Date: Mon 7/8/13



CD CERTIFICATION

CD CERTIFICATION

I certify that this electronic copy is complete, identical to the paper copy, and virus free.

A handwritten signature in black ink that reads "Jack A. Wintle". The signature is written in a cursive style with a large initial 'J' and 'W'.

Jack A. Wintle, P.G.
Senior Regulatory Specialist
Sage Environmental Consulting, LP