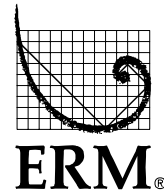


**Environmental
Resources
Management**

300 Chastain Center Blvd.
Suite 375
Kennesaw, GA 30144
(770) 590-8383
(770) 590-9164 (fax)

July 30, 2010

Ms. Alexandra Cleary
Georgia Environmental Protection Division
Response and Remediation Program
2 Martin Luther King, Jr. Drive, SE
Atlanta, Georgia 30334



Subject: Voluntary Remediation Program Application
Former Coats & Clark Plant 1
Toccoa, Stephens County, Georgia
HSI Site No. 106320

Dear Ms Cleary:

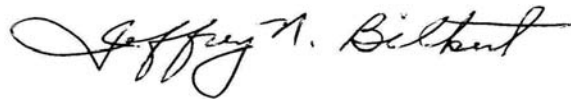
This Voluntary Remediation Program application is being submitted on behalf of Coats & Clark Inc. (Coats) for the referenced property. This submittal includes a completed Voluntary Remediation Program Application and Checklist along with a Preliminary Voluntary Remediation Plan and Preliminary Conceptual Site Model. A check payable to the Georgia Department of Natural Resources in the amount of \$5,000 is also included. Please note that while Coats no longer owns this site, they have express permission from the property owner to enter the site to perform corrective action

We look forward to your review of this application. Please contact us with questions or comments concerning this matter.

Sincerely,



Shanna L. Thompson, P.E.
Project Manager/GA PE No. PE031306





Jeffrey N. Bilkert
Principal


Enclosures: (VRP Application and Checklist, Application Fee,
Preliminary Remediation Plan, and ERM Invoice Summary)

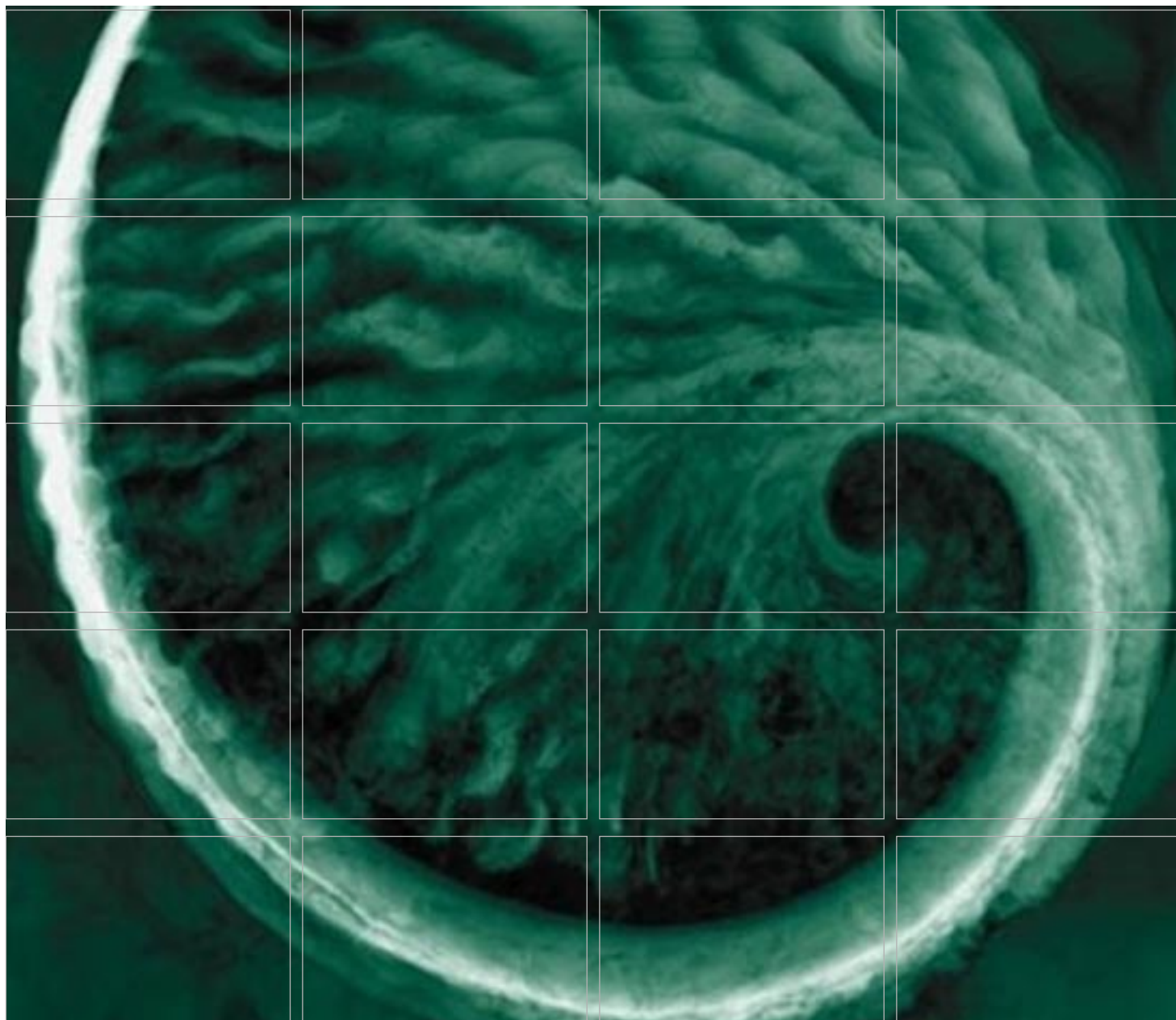
cc: Mike Bell - Coats
Doug Cloud - M2C2Law
City of Toccoa

Voluntary Remediation Plan Application Form and Checklist

VRP APPLICANT INFORMATION					
COMPANY NAME	Coats & Clark Inc.				
CONTACT PERSON/TITLE	Mike Bell, Director Environmental & Safety Engineering				
ADDRESS	374 Coats Drive, Toccoa, GA 30577-7986				
PHONE	706/886-2141, Ext. 2248	FAX	706/886-9182	E-MAIL	mike.bell@coats.com
GEORGIA CERTIFIED PROFESSIONAL GEOLOGIST OR PROFESSIONAL ENGINEER OVERSEEING CLEANUP					
NAME	Shanna L. Thompson		GA PE/PG NUMBER	PE031306	
COMPANY	Environmental Resources Management (ERM)				
ADDRESS	300 Chastain Center Boulevard, Suite 375, Kennesaw, GA 30144				
PHONE	770/590-8383	FAX	770/590-9164	E-MAIL	shanna.thompson@erm.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 style="margin-left: 20px;">(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 style="margin-left: 20px;">(B) Currently undergoing response activities required by an order of the regional administrator of the federal Environmental Protection Agency; or</p> <p style="margin-left: 20px;">(C) A facility required to have a permit under Code Section 12-8-66.</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 style="margin-left: 20px;">(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 style="margin-left: 20px;">(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					
APPLICANT'S NAME/TITLE (PRINT)	Mike Bell, Director Environmental & Safety Engineering			DATE	

QUALIFYING PROPERTY INFORMATION			
TAX PARCEL ID	R583800 T10 005	PROPERTY SIZE (ACRES)	37.67
PROPERTY ADDRESS	506 West Doyle Street,		
CITY	Toccoa, GA 50577	COUNTY	Stephens
LATITUDE	34.34.44N	LONGITUDE	83.20.16W
PROPERTY OWNER(S)	Toccoa Renaissance, LLP	PHONE #	828/369-2265
MAILING ADDRESS	1281 Georgia Road, PMV 453		
CITY	Franklin	STATE	North Carolina 28734
ITEM #	DESCRIPTION OF REQUIREMENT	Location in VRP (i.e. pg., 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.	Attached to cover letter	
2.	WARRANTY DEED(S) FOR QUALIFYING PROPERTY.	Section 3.0 and Appendix A, Preliminary Remediation Plan.	
3.	TAX PLAT OR OTHER FIGURE INCLUDING QUALIFYING PROPERTY BOUNDARIES, ABUTTING PROPERTIES, AND TAX PARCEL IDENTIFICATION NUMBER(S).	Section 4.0 and Appendix B, Preliminary Remediation Plan.	
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-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. The following four (4) generic milestones are required in all initial plans with	Preliminary Remediation Plan.	

	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:		
5.a.	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;	Section 7 and Figure 8, Preliminary Remediation Plan	
5.b.	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;	Section 7 and Figure 8, Preliminary Remediation Plan	
5.c.	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	Section 7 and Figure 8, Preliminary Remediation Plan	
5.d.	Within 60 months after enrollment, the participant must submit the compliance status report required under the VRP, including the requisite certifications.	Section 7 and Figure 8, Preliminary Remediation Plan	
6.	<p>SIGNED AND SEALED PE/PG 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, <u>et seq.</u>). 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>Shanna L. Thompson, PE031306 Printed Name and GA PE/PG Number</p> <p><i>Shanna L. Thompson</i> Signature and Stamp</p> <p style="text-align: right;">7/30/2010 Date</p> 	Invoice attached to this application.	



Preliminary Remediation Plan and Preliminary Conceptual Site Model

**Former Coats & Clark Inc. Plant 1,
Toccoa, Georgia HSI Site No. 10630**

July 30, 2010

www.erm.com

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- C *Electronic Copies of this Document***

This Preliminary Remediation Plan (VR Plan), including a Preliminary Conceptual Site Model, has been prepared for the Former Coats & Clark Plant 1 Site (the Site) located in Toccoa, Georgia for submittal to Georgia's Voluntary Remediation Program (VRP) on behalf of Coats & Clark Inc. (Coats). The purpose of the Preliminary Remediation Plan and Preliminary Conceptual Site Model is to provide reasonably available current information to the extent known as required by the VRP application, with regard to:

- the Site's surface and subsurface setting;
- the known or suspected sources of contamination;
- how contamination might move within the environment;
- potential human health and ecological receptors;
- complete or incomplete exposure pathways that may exist at the Site; and
- a projected milestone schedule for investigation and remediation of the Site.

This Preliminary VR Plan has been organized to respond to all parts of the Georgia Environmental Protection Division's VRP Application Form and Checklist. A table of delineation standards and brief supporting text, charts, and figures are included.

The Site is a former textile finishing facility and is listed on Georgia's Hazardous Sites Inventory (HSI) as Site Number 10630. It is located at 506 West Doyle Street in Toccoa, Stephens County, Georgia and includes 39.37 acres. Most of the Site is undeveloped. Timber on the Site was clear cut several years ago. Development at the Site includes several former textile-related buildings located at the southeast corner of the property. A Site location map is shown on Figure 1.

2.0

APPLICATION FEE

A check payable to the Georgia Department of Natural Resources in the amount of \$5,000 was included with this VR Plan when submitted to the Georgia Environmental Protection Division (GAEPD) in July 2010.

3.0

WARRANTY DEEDS

A copies of the warranty deeds for the qualifying property are included in Appendix A.

4.0

TAX PLAT

The tax parcel identification for the Site is R583800 T10 005. A tax plat for the Site obtained from the Stephens County Tax Assessor is provided in Appendix B.

5.0

COMPACT DISC COPIES OF PRELIMINARY VR PLAN AND PRELIMINARY CONCEPTUAL SITE MODEL

Two compact disc copies of this Preliminary VR Plan and Preliminary Conceptual Site Model in searchable portable document format (PDF) are included in Appendix C.

6.0 *PRELIMINARY CONCEPTUAL SITE MODEL*

6.1 *CONTAMINANTS OF CONCERN*

6.1.1 *Soil*

Numerous soil borings were drilled at the Site and numerous soil samples were collected for laboratory analyses. Analyses conducted on the soil samples included metals, volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). Information from these efforts was used to prepare a Compliance Status Report (CSR) for the Site.

Metals detected in the soils at the Site included:

- Antimony,
- Arsenic,
- Barium,
- Cadmium,
- Chromium,
- Copper,
- Lead,
- Nickel,
- Silver, and
- Zinc.

Delineation standards for these metals in soils were Site-specific background levels, which are provided in Table 1.

VOCs detected in the soils at the Site were limited to trichloroethene (TCE). SVOCs detected in the soils were limited to:

- Bis(2-ethylhexyl)phthalate,
- Fluoranthene, and
- Phenanthrene.

Delineation standards for these organic compounds in soils were the detection limits of the analytical procedures, which are provided in Table 1.

Soils not in compliance with Risk Reduction Standards (RRS) calculated using Rule 391-3-19-.07 were remediated by excavation and off-Site disposal in January 2006. A Corrective Action Completion Report for Soils was

submitted to GAEPD in February 2006. A summary of the regulated constituents in soil that remained on-Site and their highest concentration subsequent to the completion of corrective action is provided in Table 2. Also provided in Table 2 is a comparison of these concentrations to the GAEPD-approved RRS. In a letter dated March 6, 2006, GAEPD stated that the soils meet the applicable RRS. In that same letter, GAEPD also stated the CSR for the Site was complete.

6.1.2 Ground Water

Twenty (20) ground water monitoring wells were installed during activities to prepare the CSR for the Site. Monitoring well locations are shown on Figure 2. Ground water quality monitoring at these wells dates back to 2000 and has shown that the Contaminants of Concern (COCs) in ground water at the Site are limited to a small number of volatile organic compounds (VOCs). The VOCs detected in ground water at the Site include:

- Carbon disulfide,
- Carbon tetrachloride,
- Chloroform,
- Cis-1,2-dichloroethene (cis-1,2-DCE),
- Tetrachloroethene (PCE),
- 1,1,1-trichloroethane (1,1,1-TCA), and
- Trichloroethene (TCE).

A summary of ground water quality data for the Site is provided in Table 3.

6.2 HYDROGEOLOGY

The Site is located at elevations ranging from 960 feet to 1,040 feet National Geodetic Vertical Datum (see Figure 1). Two geologic cross-sections of the Site were prepared as part of the three-dimensional Preliminary Conceptual Site Model. Geologic logs for the ground water monitoring wells were used in this effort. A geologic cross-section reference map is provided as Figure 3. The geologic cross-sections are provided as Figures 4 and 5. Soils encountered during drilling at the Site were primarily saprolitic sands ranging from fine to coarse-grained with some silt and clay content. The bedrock appears to be granitic gneiss. A perennial creek flows through the Site from south to north.

The depth to water was greater than 50 feet in some wells on Site. It should also be noted that well MW-8 was completed to the top of bedrock and has remained dry since it was installed in October 2000. This shows that at the higher elevations at the Site, the shallow water-bearing zone may not be present in some areas.

A review of the geologic logs for the monitoring wells installed at the Site indicates that the water-bearing materials encountered during the drilling are saprolite that is dominated by fine to medium sand. The hydraulic conductivity of these materials is estimated to range from 0.28 feet per day (10^{-4} centimeters-per-second) to 28 feet per day (10^{-2} centimeters-per-second) (Freeze and Cherry, 1979).

Ground water and surface water elevation monitoring has been conducted on several occasions at the Site. The data from the most recent ground water elevation monitoring event, May 20, 2010, were used to prepare the potentiometric surface map shown on Figure 6. Ground water and surface water elevation data from a previous monitoring event, March 2, 2004, are also included on the aforementioned geologic cross-sections. Based on the ground water contours, it is estimated that the direction of ground water movement in the developed area of the Site is generally northwest. Historical data show that west of the creek, the direction of ground water movement is towards the northeast. The March 2, 2004 ground water and surface water elevation data show that the creek is a ground water flow divide and discharge point.

Hydraulic gradients at the Site are estimated to be between 0.040 and 0.051. These estimates were made using the data for wells MW-4 and MW-10, and MW-15 and MW-17. Using these gradients, the estimated range of hydraulic conductivity values discussed above, and assuming an effective porosity of 20 percent, it is estimated that the rate of ground water movement at the Site is between 0.056 feet-per-day and 7.1 feet-per-day.

Two well clusters are located at the Site. Each cluster consists of a well completed into the shallow water-bearing zone and one well completed into the bedrock. Wells MW-3 and MW-11 comprise one cluster. Wells MW-10 and well MW-19 comprise the second cluster. Wells MW-3 and MW-10 are completed in the shallow water-bearing zone. Wells MW-11 and MW-19 are completed in the bedrock. Ground water elevation monitoring data from these well clusters indicate that a vertical hydraulic gradient in the downward direction is present in some areas of the Site while a vertical gradient in the upward direction is present in others.

6.3 *CONTAMINANT SOURCES*

Extensive work was conducted to identify the source of regulated substances in ground water. This work included:

- A review of historical records concerning the Site, including aerial photographs, fire insurance maps, and facility engineering records.
- Interviews with long-time employees of the facility.

Based on this work, several possible sources of VOCs in ground water were identified. They included:

- A former wastewater holding pond.
- A former flammable chemicals storage building.
- An outside area reportedly used by facility personnel for degreasing equipment.
- Wooded areas located north of the developed portion of the Site where unauthorized trash dumping has taken place.
- An area inside the main building at the Site where small amounts of solvent were used for spot cleaning and for cleaning paint equipment associated with a metalizing operation.

Each of these possible source areas have been investigated. None were confirmed as being the source of the VOCs in ground water at the Site.

6.4 *CONTAMINANT DISTRIBUTION IN GROUND WATER*

Historical ground water quality data for the Site are summarized in Table 3. The most recent ground water quality monitoring event was conducted at the Site in April 2010. During this event, 14 of the 20 monitoring wells at the Site were sampled. The wells sampled included those that historically defined the detectable limits of ground water contamination (i.e., wells MW-4, MW-5, MW-6, MW-7, MW-9, and MW-14 have been below detection limits), as well as those with historical concentrations of regulated constituents above detection limits. VOCs detected during the April 2010 ground water monitoring event were limited to:

- Carbon tetrachloride at well MW-3 only.

- Chloroform at wells MW-3 and MW-11 only.
- Cis-1,2-DCE at well MW-3 only.
- 1,1,1-TCA at well MW-4 only.
- TCE at wells MW-1, MW-3, MW-10, MW-13, and MW-15.

Delineation standards for these and other VOCs that have been detected in ground water at the Site are provided in Table 4. The results of the April 2010 sampling are presented on Figure 7. They are also shown on the geologic cross-sections presented as Figures 4 and 5. Together, Figures 4, 5, and 7 provide a three-dimensional representation of subsurface conditions at the Site. As shown on Figure 7, VOCs in the horizontal direction have been delineated to the detection limits of the laboratory procedure (i.e., Below Detection Limits [BDL], see Table 4).

Two bedrock wells, MW-11 and MW-19, have been installed on-Site. With the exception of chloroform at MW-11, no VOCs were detected in the ground water samples collected from these wells during the April 2010 sampling event. This demonstrates that with the exception of chloroform, VOCs have been delineated vertically to BDL. The Type 1 Risk Reduction Standard (RRS) for chloroform as established by Rule 391-3-19-.07(6) is 0.1 milligrams per liter (mg/L). The concentration of chloroform at well MW-11 in April 2010 was 0.02 mg/L. Chloroform, therefore, has been delineated vertically to the HSRA Type 1 RRS.

6.5 *SURFACE WATER QUALITY*

An unnamed creek flows south to north across the Site. Surface water samples from this creek were collected in April 2010 and analyzed for VOCs. The five surface water sample locations are shown on Figure 7. No VOCs were detected in these samples.

6.6 *CONTAMINANT FATE AND TRANSPORT*

As discussed previously, a well defined source of VOCs in ground water does not appear to be present at the Site. The small number of VOCs present in ground water at the Site are generally limited to the shallow water-bearing zone. Of the VOCs detected, TCE is the most commonly detected. The highest TCE concentration in ground water is located in proximity to well MW-15.

Ground water elevation monitoring data show that ground water at the Site moves northwest, towards the unnamed creek. Based on this, it is expected that VOCs in ground water also move northwest. The shape of the VOC plume (see Figure 7) is consistent with this expectation. Additionally, ground water and surface water elevation monitoring have shown that the unnamed creek is a discharge point for ground water. Because of this, the creek is a discharge point for the plume and serves as a hydraulic barrier to further plume migration. It is stressed, however, that surface water quality data show that VOCs are not present in the creek at concentrations above laboratory detection limits. Consequently, it is concluded that the discharge of VOCs to the creek has no measurable effect.

6.7 *POTENTIAL HUMAN HEALTH AND ECOLOGICAL RECEPTORS*

The Site is mostly undeveloped. Timber on the Site was clear cut several years ago. Most of the Site is currently covered with thick vegetation that has regenerated naturally since the clear cutting. A portion of the former Plant 1 building is leased to a company involved in the production of environmentally friendly cleaning products. It appears that two to three persons are employed by this company. Potential ecological receptors are believed to be limited to animals common to the northeast Georgia area. No endangered species are known to be found at the Site. There is no evidence to suggest, however, that humans or ecological receptors are exposed to the VOCs in ground water.

6.8 *POTENTIAL EXPOSURE PATHWAYS*

The Site and surrounding area are served by a municipal water supply system operated by the city of Toccoa, Georgia. As such, ground water in this area is not used as a drinking water source. The closest water supply well known to be located in the vicinity of the Site is operated by Toccoa Falls College. The well is located approximately 4,000 feet northwest of the Site. Toccoa Falls College personnel report that the well has been disconnected from the potable water system and is now used strictly for irrigating baseball and soccer fields. Several ground water discharge points in the form of creeks are located in between the Site and this well. Based on this information and the extent of the contaminant plume, the ground water exposure pathway is not complete.

As discussed previously, the unnamed creek that flows south to north across the Site is a discharge point for shallow ground water. VOCs were not

detected in the sampling event conducted in April 2010. TCE has, however, occasionally been detected at low concentrations in surface water samples from this creek. Based on this, it appears that the surface water exposure pathway may be complete.

The vapor intrusion pathway at the Site has not been fully evaluated.

PROPOSED REMEDIAL ACTION

A HSRA CSR for this Site was prepared previously and approved by GAEPD on March 6, 2006. Soil remediation was conducted in accordance with an approved HSRA Corrective Action Plan dated January 2006. In March 2006, GAEPD approved the HSRA Corrective Action Completion Report for Soils and concurred that the soils at the Site are in compliance with the applicable RRS. Additional investigation and corrective action regarding Site soils is not needed or planned.

The nature and extent of ground water contamination has been characterized by means of the installation and sampling of numerous monitoring wells. Additional efforts to delineate the nature and extent of regulated constituents in ground water is not needed or planned. RRS developed during the implementation of the Preliminary Remediation Plan will be included in the CSR required under the VRP. The results of any modeling associated with the development of RRS, along with supporting backup, will be incorporated into the VRP CSR, as necessary.

The vapor intrusion pathway will be evaluated. This will include soil vapor sampling, the results of which will be compared to appropriate screening levels. The results of any vapor intrusion modeling that might be conducted, along with supporting backup, will be incorporated into the VRP CSR, as necessary.

Depending on the results of these evaluations, additional corrective action remedies for ground water will be evaluated and implemented, as necessary

8.0 ***PROJECTED MILESTONE SCHEDULE***

A projected milestone schedule is provided on the Gantt chart shown on Figure 8.

Tables

Table 1
Soil Delineation Standards
Preliminary Remediation Plan and Preliminary Conceptual Site Model
Former Coats Clark Plant 1
HSI Site No. 10630

Regulated Substance in Soils	Soil Delineation Standard (mg/kg)	Comment
Arsenic	3.9	Site-Specific Background Level
Barium	160	Site-Specific Background Level
Beryllium	2.4	Site-Specific Background Level
Cadmium	2.7	Site-Specific Background Level
Chromium	31	Site-Specific Background Level
Copper	21	Site-Specific Background Level
Mercury	0.5	Site-Specific Background Level
Lead	51	Site-Specific Background Level
Nickel	27	Site-Specific Background Level
Antimony	4.8	Site-Specific Background Level
Selenium	3.4	Site-Specific Background Level
Silver	2.4	Site-Specific Background Level
Thallium	2	Site-Specific Background Level
Zinc	51	Site-Specific Background Level
Trichloroethene	0.005 - 0.0074	Range of Laboratory Detection Limits
Bis(2-ethylhexyl)phthalate	0.33 - 2.1	Range of Laboratory Detection Limits
Fluoranthene	0.33 - 2.1	Range of Laboratory Detection Limits
Phenanthrene	0.33 - 2.1	Range of Laboratory Detection Limits

Table 2
Highest Concentrations of Regulated Substances in Soil and Comparison to Risk Reduction Standards
Preliminary Remediation Plan and Preliminary Conceptual Site Model
Former Coats Clark Plant 1
HSI Site No. 10630

Regulated Substances Detected In Soil	Highest Concentration (mg/kg)	Sample Location	Sample Depth (feet)	Risk Reduction Standards (mg/kg)						Comments
				Type 1	Type 2	Type 3		Type 4		
						0-2 feet	>2 feet	0-2 feet	>2 feet	
Arsenic	35	GP-2	0-4	20	5.42E-01	38.1	41	3.31	3.31	Soils on Coats property are in compliance with Type 3 RRS for As.
Barium	920	TP-31	1-4	1,000	19.5	1,000	1,000	23	23	Soils on Coats property are in compliance with Type 1RRS for Ba.
Beryllium	<1.3	Various	Various	2	3.90E-02	3	3	4.60E-01	4.60E-01	Soils on Coats property are in compliance with Type 1RRS for Be.
Cadmium	2.7	GP-13	0-1	2	4.88E-02	39	39	5.75E-02	5.75E-02	Soils on Coats property are in compliance with Type 3 RRS for Cd.
Chromium	200	BKG-11	10-12	100	38.40	38.40	1,200	118.3	118.3	Soils on Coats property are in compliance with Type 3 RRS for Cr.
Copper	83	GP-15	1-2	100	12.7	1500	1500	47	47	Soil on Coats property are in compliance with Type 1 RRS for Cu.
Lead	110	TP-33	1-4	75	325	400	400	929	929	Soil on Coats property are in compliance with Type 2 RRS for Pb.
Nickel	120	BKG-11	10-12	50	3.05	420	420	23.5	23.5	Soils on Coats property are in compliance with Type 3 RRS for Ni.
Antimony	10	GP-22	0-2	4	6.10E-02	10	10	4.70E-01	4.70E-01	Soil on Coats property are in compliance with Type 3 RRS for Sb.
Silver	<2	Various	Various	2	9.76E-01	10	10	5.88	5.88	Soil on Coats property are in compliance with Type 1 RRS for Ag.
Zinc	260	GP-15	1-2	100	45.8	2800	2800	353	353	Soils on Coats property are in compliance with Type 3 RRS for Zn.
Trichloroethene	0.017	GP-17	0-2	0.5	3.52E-01	5.00E-01	5.00E-01	3.56E-01	3.56E-01	Soils on Coats property are in compliance with Type 1 RRS for TCE.
Bis(2-ethylhexyl)phthalate	2.2	GP-18	0-1	50	652	50	50	4,090	13,500	Soils on Coats property are in compliance with Type 1 RRS for DEHP.
Fluoranthene	0.62	GP-3	12-16	500	3,080	500	500	28,400	28,400	Soils on Coats property are in compliance with Type 1 RRS for fluoranthene.
Phenanthrene	0.34	GP-3	12-16	110	2,363	110	110	7,940	7,940	Soils on Coats property are in compliance with Type 1 RRS for phenanthrene.

Table 3
Ground Water Quality Data
Preliminary Remediation Plan and Preliminary Conceptual Site Model
Former Coats & Clark Plant 1
HSI Site No. 10630

Well ¹	Date Sampled	VOCs (mg/L)						
		Carbon Disulfide	Carbon Tetrachloride	Chloroform	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene
MW-1	4/23/2010	<.01	<.005	<.005	<.005	<.005	<.005	0.042
MW- 1	4/7/2008	< .01	< .005	< .005	< .005	< .005	< .005	0.009
MW- 1	10/3/2007	< .01	< .002	0.018	< .002	< .002	< .002	0.020
MW- 1	4/26/2007	< .01	< .005	< .005	< .005	< .005	< .005	0.015
MW- 1	10/4/2006	< .01	< .005	0.007	< .005	< .005	< .005	0.025
MW- 1	4/6/2006	< .01	< .005	0.006	< .005	< .005	< .005	0.024
MW- 1	7/1/2004	< .01	< .005	0.007	< .005	< .005	< .005	0.032
MW- 1	2/6/2003	< .1	< .005	< .005	< .005	< .005	< .005	0.096
MW- 1	4/24/2002	< .01	< .005	< .005	< .005	< .005	< .005	0.053
MW-111 ²	4/24/2002	< .01	< .005	< .005	< .005	< .005	< .005	0.042
MW-1	7/17/2001	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 1	1/23/2001	< .01	< .005	< .005	< .005	< .005	< .005	0.084
MW- 1	2/8/2000	< .01	< .005	< .005	< .005	< .005	< .005	0.081
MW- 2	4/5/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 2	11/25/2003	< .01	< .002	< .002	< .002	< .002	< .002	< .002
MW- 2	4/22/2002	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 2	1/24/2001	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 2	2/8/2000	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 3	4/21/2010	<.01	0.033	0.055	0.0055	<.005	<.005	0.037
MW- 3	4/7/2008	< .01	0.014	0.033	< .005	< .005	< .005	0.007
MW- 3	10/3/2007	< .01	0.027	0.045	0.005	< .002	< .002	0.011
MW- 3	4/26/2007	< .01	0.029	0.03	< .005	< .005	< .005	0.033
MW- 3	10/4/2006	< .01	0.022	0.039	0.005	< .005	< .005	0.007
MW- 3	4/6/2006	< .01	0.041	0.034	0.005	< .005	< .005	0.029
MW- 3	7/1/2004	< .01	0.033	0.081	0.008	< .005	< .005	0.039
MW- 3	2/6/2003	< .1	0.019	0.1	0.007	< .005	< .005	0.15
MW- 3	4/22/2002	< .01	0.011	0.059	< .005	< .005	< .005	0.03
MW- 3	7/17/2001	< .01	0.02	0.11	0.007	< .005	< .005	0.063
MW- 3	1/23/2001	0.015	0.013	0.06	< .005	0.034	< .005	< .005
MW- 3	2/8/2000	< .01	0.011	0.055	< .005	< .005	< .005	0.027
MW-4	4/21/2010	<.01	<.005	<.005	<.005	<.005	0.0094	<.005
Dup-2	4/21/2010	<.01	<.005	<.005	<.005	<.005	0.0098	<.005
MW- 4	4/7/2008	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 4	10/3/2007	< .01	0.002	< .002	< .002	< .002	< .002	< .002
MW- 4	4/26/2007	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 4	10/4/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 4	4/6/2006	< .01	0.007	0.005	< .005	< .005	0.013	< .005
MW- 4	7/2/2004	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 4	4/22/2002	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 4	1/23/2001	0.024	< .005	< .005	< .005	< .005	< .005	< .005
MW- 4	2/8/2000	< .01	< .005	< .005	< .005	< .005	0.006	< .005
MW- 5	4/20/2010	<.01	<.005	<.005	<.005	<.005	<.005	<.005
MW- 5	4/7/2008	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 5	4/25/2007	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 5	4/6/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 5	2/6/2003	< .1	< .005	< .005	< .005	< .005	< .005	< .005
MW- 5	4/23/2002	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 5	7/17/2001	< .01	NA ³	NA	NA	NA	NA	NA
MW- 5	1/24/2001	0.012	< .005	< .005	< .005	< .005	< .005	< .005
MW-6	4/20/2010	<.01	<.005	<.005	<.005	<.005	<.005	<.005
Dup-1	4/20/2010	<.01	<.005	<.005	<.005	<.005	<.005	<.005
MW- 6	4/7/2008	< .01	< .005	0.018	< .005	< .005	< .005	< .005
MW- 6	4/26/2007	< .01	< .005	0.028	< .005	< .005	< .005	< .005
MW- 6	4/4/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 6	4/22/2002	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 6	1/24/2001	< .01	< .005	< .005	< .005	< .005	< .005	< .005

Table 3
Ground Water Quality Data
Preliminary Remediation Plan and Preliminary Conceptual Site Model
Former Coats & Clark Plant 1
HSI Site No. 10630

Well ¹	Date Sampled	VOCs (mg/L)						
		Carbon Disulfide	Carbon Tetrachloride	Chloroform	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene
MW-7	4/21/2010	<.01	<.005	<.005	<.005	<.005	<.005	<.005
MW- 7	4/4/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 7	2/6/2003	< .1	< .005	< .005	< .005	< .005	< .005	< .005
MW- 7	4/22/2002	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-7	7/17/2001	< .01	NA	NA	NA	NA	NA	NA
MW- 7	1/24/2001	0.011	< .005	< .005	< .005	< .005	< .005	< .005
MW-9	4/20/2010	<.01	<.005	<.005	<.005	<.005	<.005	<.005
MW- 9	4/5/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 9	4/22/2002	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 9	7/17/2001	< .01	NA	NA	NA	NA	NA	NA
MW- 9	1/24/2001	0.031	< .005	< .005	< .005	< .005	< .005	< .005
MW-10	4/20/2010	<.01	<.005	<.005	<.005	<.005	<.005	0.018
MW- 10	4/7/2008	< .01	< .005	< .005	< .005	< .005	< .005	0.081
MW-10	10/3/2007	< .01	< .002	0.002	0.003	< .002	< .002	0.17
MW-10	4/25/2007	< .01	< .005	< .005	< .005	< .005	< .005	0.14
MW-10	10/4/2006	< .01	< .005	< .005	< .005	< .005	< .005	0.24
MW-10	4/5/2006	< .01	< .005	< .005	< .005	< .005	< .005	0.13
MW-10	2/6/2003	< .1	< .005	< .005	< .005	< .005	< .005	0.021
MW-10	4/22/2002	< .01	< .005	< .005	< .005	< .005	< .005	0.018
MW-10	7/17/2001	< .01	< .005	< .005	< .005	0.005	< .005	0.022
MW-10	1/24/2001	< .01	< .005	< .005	< .005	< .005	< .005	0.04
MW-11	4/21/2010	<.01	<.005	0.02	<.005	<.005	<.005	<.005
MW- 11	4/7/2008	< .01	< .005	0.006	< .005	< .005	< .005	< .005
MW-11	10/3/2007	< .01	< .002	0.02	< .002	< .002	< .002	< .002
MW-11	4/26/2007	< .01	< .005	0.006	< .005	< .005	< .005	< .005
MW-11	10/4/2006	< .01	< .005	0.008	< .005	< .005	< .005	< .005
MW-11	4/4/2006	< .01	< .005	0.008	< .005	< .005	< .005	< .005
MW-11	4/22/2002	< .01	< .005	0.021	< .005	< .005	< .005	< .005
MW-11	1/24/2001	< .01	< .005	0.025	< .005	< .005	< .005	< .005
MW-12	4/5/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-13	4/20/2010	<.01	<.005	<.005	<.005	<.005	<.005	0.037
MW- 13	4/7/2008	< .01	< .005	< .005	< .005	< .005	< .005	0.037
MW-13	10/3/2007	< .01	< .002	< .002	< .002	< .002	< .002	0.045
MW-13	4/25/2007	< .01	< .005	< .005	< .005	< .005	< .005	0.046
MW-13	10/4/2006	< .01	< .005	< .005	< .005	< .005	< .005	0.072
MW-13	4/5/2006	< .01	< .005	< .005	< .005	< .005	< .005	0.11
MW-13	7/2/2004	< .01	< .005	< .005	< .005	< .005	< .005	0.064
MW-13	2/6/2003	< .1	< .005	< .005	< .005	< .005	< .005	0.078
MW-13	4/23/2002	< .01	< .005	< .005	< .005	< .005	< .005	0.056
MW-13	7/17/2001	< .01	< .005	< .005	< .005	< .005	< .005	0.078
MW-14	4/21/2010	<.01	<.005	<.005	<.005	<.005	<.005	<.005
MW- 14	4/7/2008	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-14	10/3/2007	< .01	< .002	< .002	< .002	< .002	< .002	0.005
MW-14	4/25/2007	< .01	< .005	< .005	< .005	< .005	< .005	0.006
MW-14	10/4/2006	< .01	< .005	< .005	< .005	< .005	< .005	0.009
MW-14	4/6/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-14	2/6/2003	< .1	< .005	< .005	< .005	< .005	< .005	0.005
MW-14	4/23/2002	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-14	11/26/2001	< .01	< .005	< .005	< .005	< .005	< .005	0.013

Table 3
Ground Water Quality Data
Preliminary Remediation Plan and Preliminary Conceptual Site Model
Former Coats & Clark Plant 1
HSI Site No. 10630

Well ¹	Date Sampled	VOCs (mg/L)						
		Carbon Disulfide	Carbon Tetrachloride	Chloroform	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene
MW-15	4/21/2010	<.01	<.005	<.005	<.005	<.005	<.005	0.12
MW- 15	4/7/2008	< .01	< .005	< .005	< .005	< .005	< .005	0.12
MW-15	10/3/2007	< .01	< .002	< .002	< .002	< .002	< .002	0.087
MW-15	4/25/2007	< .01	< .005	< .005	< .005	< .005	< .005	0.068
MW-15	10/4/2006	< .01	< .005	< .005	< .005	< .005	< .005	0.038
MW-15	4/5/2006	< .01	< .005	< .005	< .005	< .005	< .005	0.087
MW-15	7/2/2004	< .01	< .005	< .005	< .005	< .005	< .005	0.13
MW-15	2/6/2003	< .1	< .005	< .005	< .005	< .005	< .005	0.32
MW-15	4/22/2002	< .01	< .005	< .005	< .005	< .005	< .005	0.32
MW-15	11/26/2001	< .01	< .005	< .005	< .005	< .005	< .005	0.21
MW- 16	4/7/2008	< .01	< .005	0.014	< .005	< .005	< .005	< .005
MW-16	4/27/2007	< .01	< .005	0.009	< .005	< .005	< .005	< .005
MW-16	4/5/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-16	4/23/2002	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-16	3/6/2002	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW- 17	4/7/2008	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-17	4/26/2007	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-17	4/5/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-17	4/23/2002	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-17	3/6/2002	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-18	4/20/2010	<.01	<.005	<.005	<.005	<.005	<.005	<.005
MW- 18	4/7/2008	< .01	< .005	< .005	< .005	< .005	< .005	0.016
MW-18	4/26/2007	< .01	< .005	< .005	< .005	< .005	< .005	0.012
MW-18	4/4/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-18	10/22/2003	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-19	4/23/2010	<.01	<.005	<.005	<.005	<.005	<.005	<.005
MW-19	4/5/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-19	10/21/2003	< .01	< .005	0.018	< .005	< .005	< .005	< .005
MW- 20	4/7/2008	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-20	4/25/2007	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-20	4/6/2006	< .01	< .005	< .005	< .005	< .005	< .005	< .005
MW-20	10/21/2003	< .01	< .005	< .005	< .005	< .005	< .005	< .005

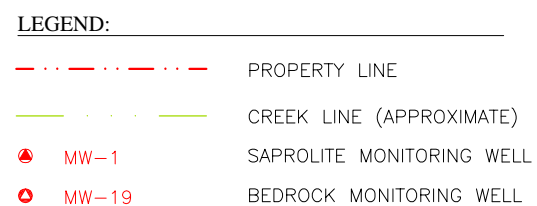
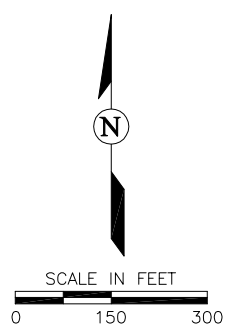
Notes:

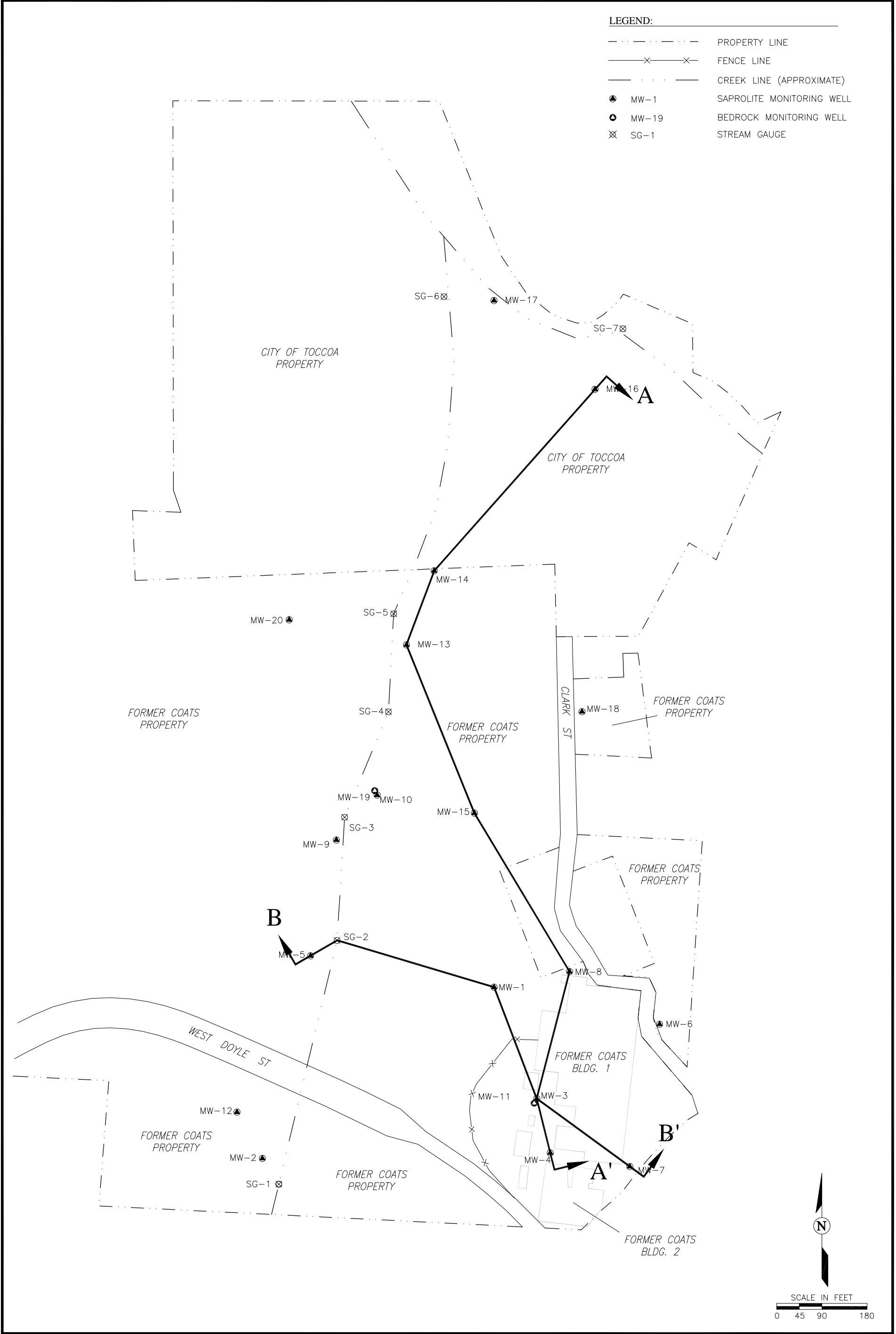
1. Well MW-8 has been dry since it was installed in October 2000. MW-12 had not been sampled for VOCs prior to April 5, 2006.
2. MW-111 was a blind duplicate of MW-1.
3. Dup-1 and Dup-2 collected on 4/20-21/10 were duplicates of MW-6 and MW-4, respectively.
3. NA = Not Analyzed.

Table 4
Ground Water Delineation Standards
Preliminary Remediation Plan and Preliminary Conceptual Site Model
Former Coats Clark Plant 1
HSI Site No. 10630

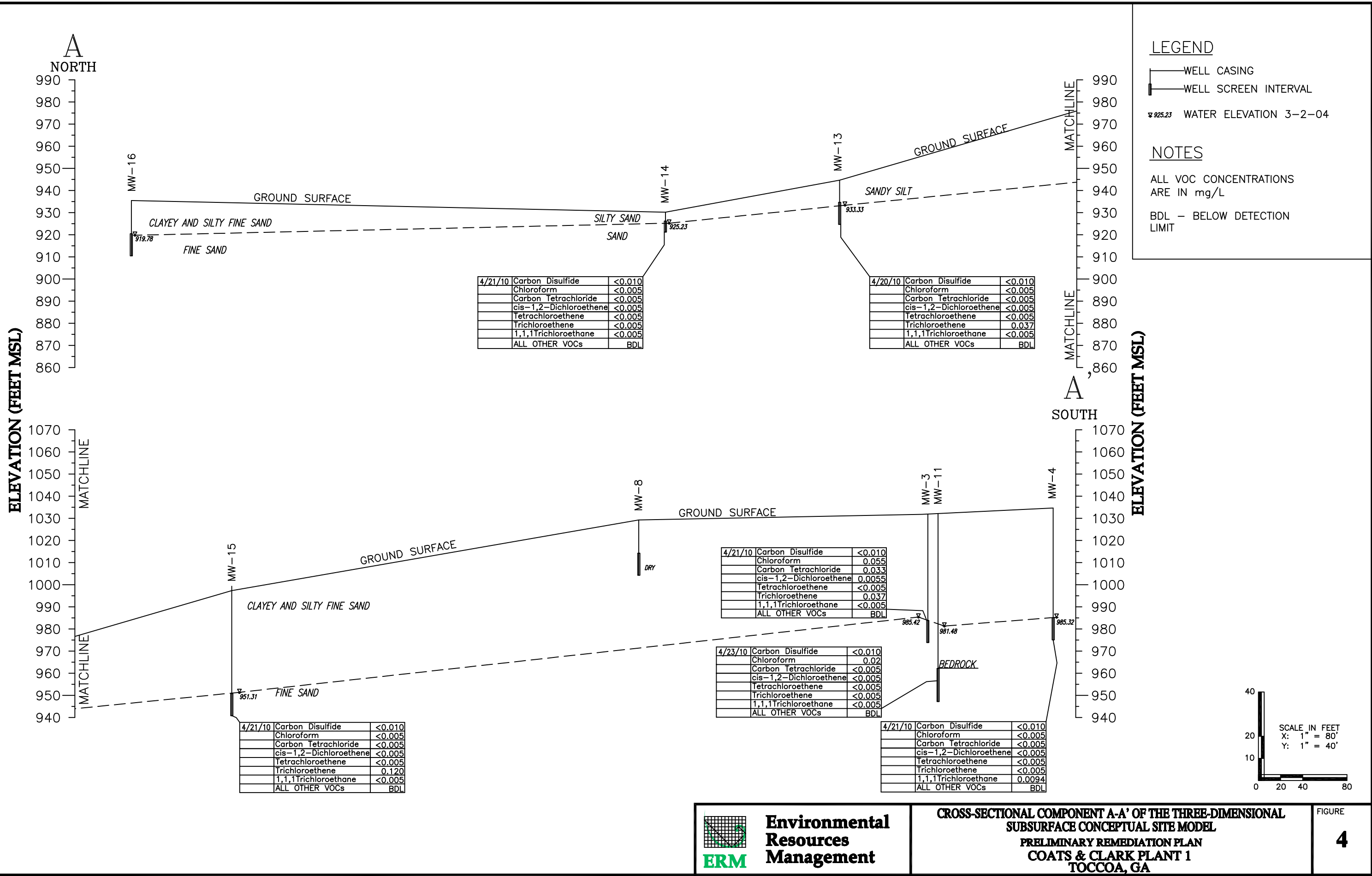
Regulated Substance in Ground Water	Ground Water Delineation Standard (mg/L)	Comment
Carbon Disulfide	0.01	Laboratory Detection Limit
Carbon Tetrachloride	0.005	Laboratory Detection Limit
Chloroform	0.1	HSRA Type 1 RRS
Cis-1,2-dichloroethene	0.005	Laboratory Detection Limit
Tetrachloroethene	0.005	Laboratory Detection Limit
1,1,1-trichloroethane	0.005	Laboratory Detection Limit
Trichloroethene	0.005	Laboratory Detection Limit

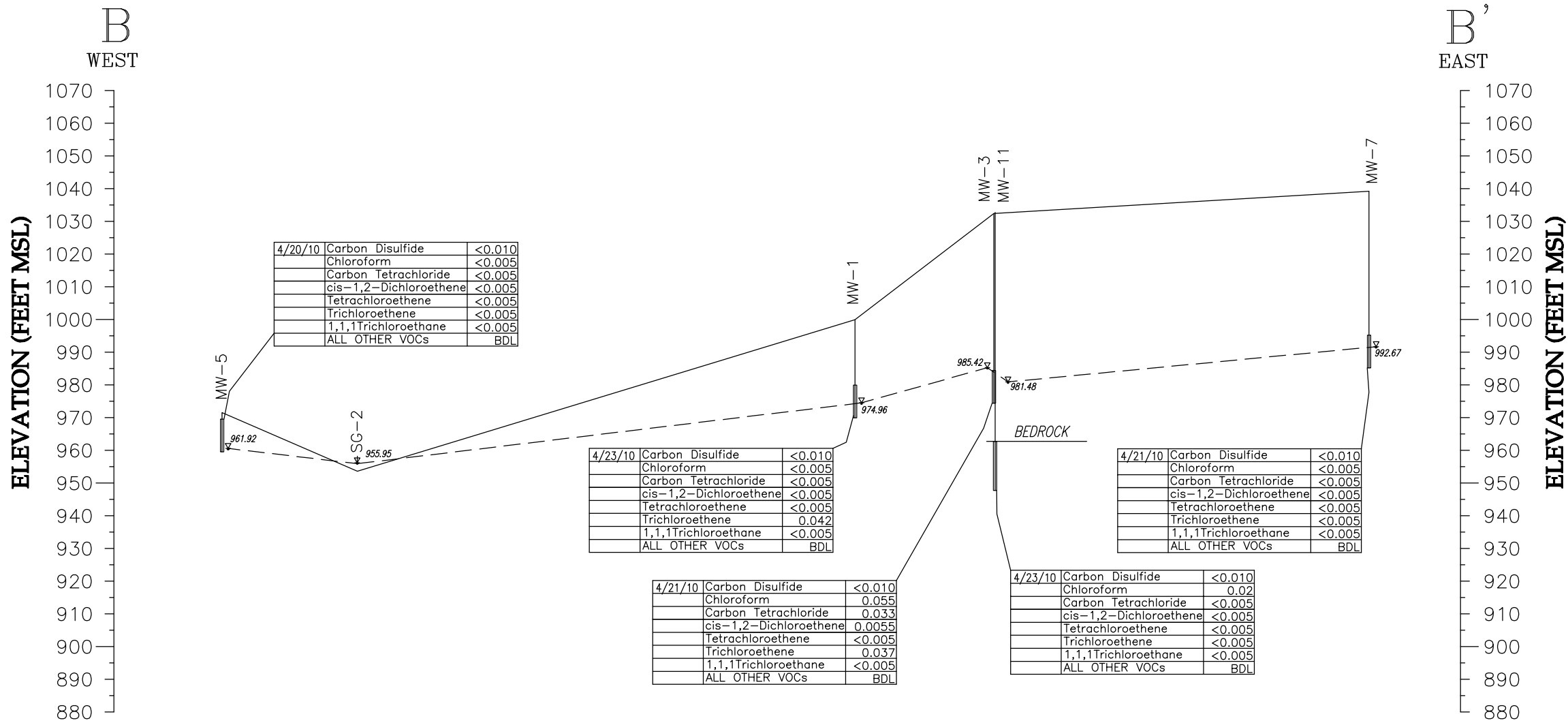
Figures





115292SiteXSEC-JULY 2010.DWG 7/21/10 SPV

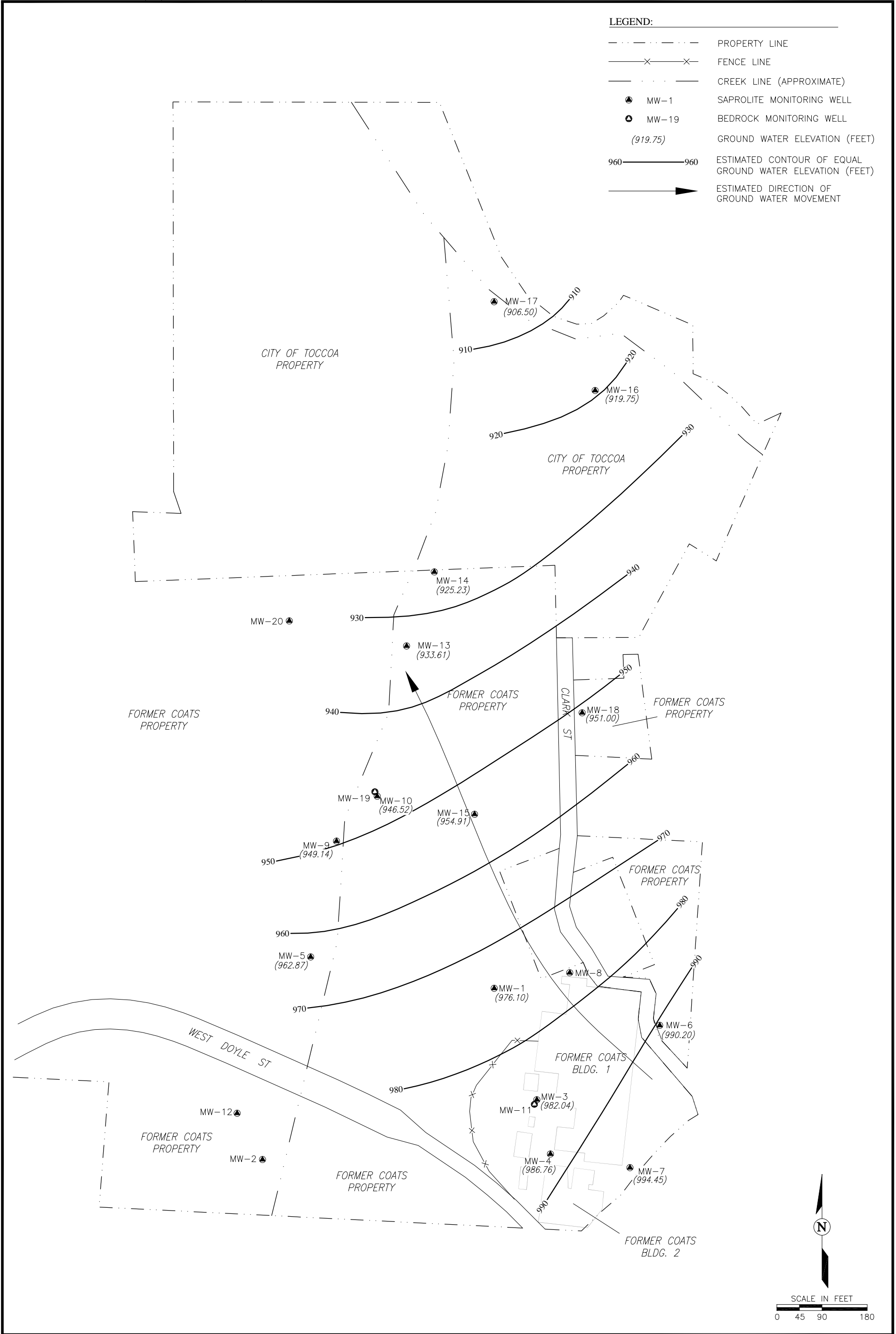




**Environmental
Resources
Management**

**CROSS-SECTIONAL COMPONENT B-B' OF THE THREE-DIMENSIONAL
SUBSURFACE CONCEPTUAL SITE MODEL
PRELIMINARY REMEDIATION PLAN
COATS & CLARK PLANT 1
TOCCOA, GA**

FIGURE
5



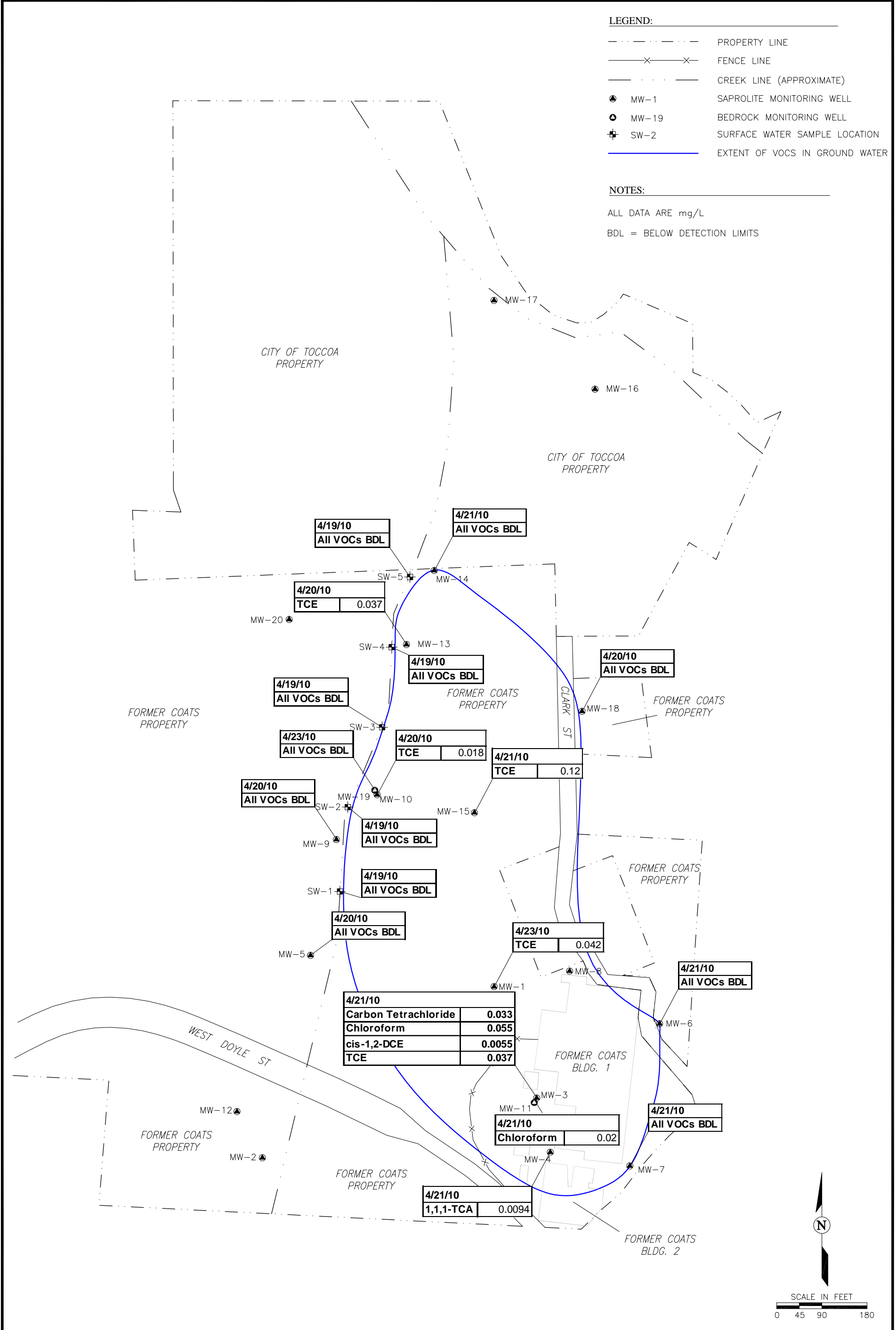
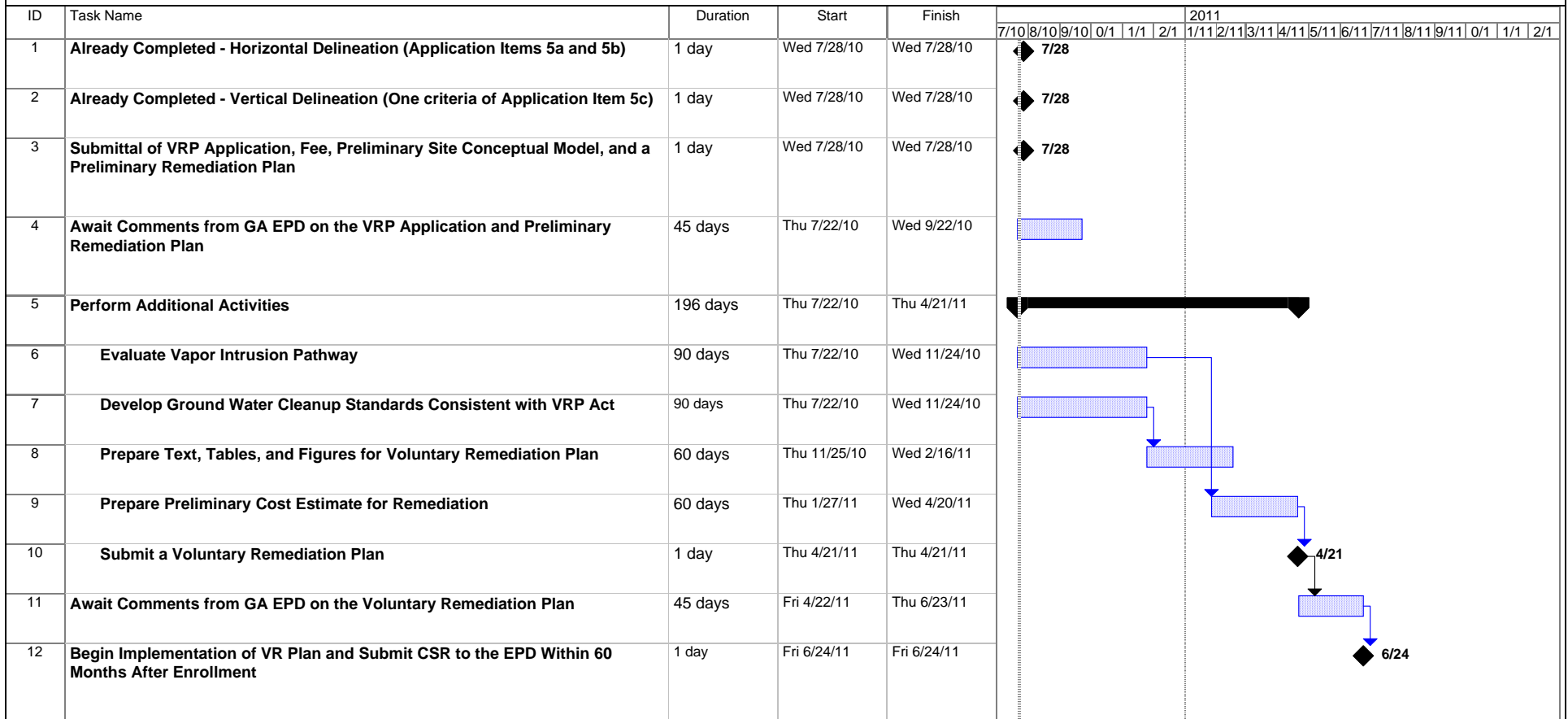
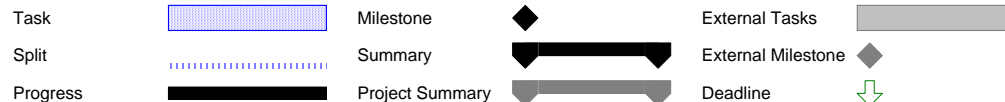


Figure 8: Projected Milestone Schedule
Preliminary Remediation Plan
HSI# 10630
July 2010



Project: Fig 8 - Gantt Chart
Date: Fri 7/23/10



Appendix A

Warranty Deeds

On
DEED Book 708 Page 177
On 5/6/2005

STEPHENS COUNTY, GEORGIA
REAL ESTATE TRANSFER TAX

On
DEED Book 738 Page 464
On 12/16/2005

PAID \$110.00

9-15-04

127-2004-7

Aubre Grafton
CLERK SUPERIOR COURT

STEPHENS COUNTY
CLERK OF COURT
AUBRE GRAFTON, CLERK
BOOK 676 PAGE 378-388

2004 SEP 15 AM 10 43

[SPACE ABOVE THIS LINE FOR RECORDING DATA]

1581-04
Alton M. Adams
P.O. Box 488
Toccoa, GA 30577

LIMITED WARRANTY DEED

STATE OF GEORGIA,

COUNTY OF STEPHENS.

THIS INDENTURE, made this 13th day of September, 2004, between
COATS & CLARK INC., a Delaware Corporation, of the First Part as Grantor,
and **TOCCOA COUNTRY CLUB, INC.,** a Georgia Corporation, of the County
of Stephens and State of Georgia, of the Second Part as Grantee:

WITNESSETH:

That the said Party of the First Part, Grantor, for and in consideration of the
sum of TEN DOLLARS (\$10.00) AND OTHER GOOD AND VALUABLE
CONSIDERATION, in hand paid at and before the sealing and delivery of these
presents, the receipt whereof is hereby acknowledged, has granted, bargained, sold

and conveyed, and by these presents does grant, bargain, sell and convey, unto the said Party of the Second Part, Grantee, its successors and assigns, all the following described property, to-wit:

TRACT 1 - WEST SAVANNAH STREET EXT. (NOT OPEN) RIGHT-OF-WAY:

All that tract or parcel of land situate, lying and being in the Toccoa (440) G.M.D., Stephens County, Georgia, in the City of Toccoa, bounded on the South by Tract 7B as shown on the plat described herein, on the North by Tract 4 as shown on the plat described herein, on the West by Braswell Street and on the East by Clark Street and **being known and designated as THE RIGHT-OF-WAY OF SAVANNAH STREET EXT. (NOT OPEN), CONTAINING 1.85 ACRES, more or less**, on a plat of survey for Coats & Clark, Inc. by Michael J. Smith, RLS, dated October 19, 1998, revised November 2, 1998, recorded in Plat Book 17, Page 238, Stephens County Plat Records, the description as contained therein being incorporated herein by reference and being more particularly described as follows: **BEGINNING** at a point on the West right-of-way of Clark Street at its intersection with the South right-of-way of West Savannah Street Ext. (not open) as shown on the above plat; thence running along the Northern boundary of Tract 7B as shown on the above described plat North 87 degrees 11 minutes West 1,365.12 feet to a point on the Southeast right-of-way of Braswell Street; thence running along the Southeast right-of-way of Braswell Street North 33 degrees 48 minutes East 20.06 feet and North 40 degrees 40 minutes East 54.21 to a point adjacent to Tract 4 as shown on the above described plat; thence running along the South boundary of Tract 4 South 87 degrees 11 minutes East 1,323.87 feet to a point on the West right-of-way of Clark Street; thence running along the West right-of-way of Clark Street South 05 degrees 03 minutes West 60.05 feet to the point of beginning.

As to the above described 1.85 acres constituting and being the right-of-way of West Savannah Street Ext. (not open), this conveyance shall act as a QuitClaim Deed.

TRACT 2:

All that tract or parcel of land situate, lying and being in the Toccoa (440) G.M.D., Stephens County, Georgia, in the City of Toccoa, lying at the intersection of the East right-of-way of North Pine Street and the North right-of-way of West Doyle

Street and being known and designated as **TRACT 2, CONTAINING 0.235 ACRE, more or less**, on a plat of survey for Coats America, Inc. by Michael J. Smith, RLS, dated April 4, 1998, recorded in Plat Book 17, Page 237B, Stephens County Plat Records, the description as contained therein being incorporated herein by reference and being more particularly described as follows:

BEGINNING at an iron pin found at the Northeast intersection of the right-of-way of West Doyle Street with the right-of-way of North Pine Street as shown on the above described plat; thence running along the East right-of-way of North Pine Street North 03 degrees 55 minutes East 114.93 feet to an iron pin found adjacent to now or formerly David Scott property; thence running along now or formerly Scott property South 87 degrees 37 minutes East 89.00 feet to an iron pin set; thence continuing along now or formerly Scott property South 03 degrees 55 minutes West 114.93 feet to an iron pin set on the North right-of-way of West Doyle Street; thence running along the North right-of-way of West Doyle Street North 87 degrees 37 minutes West 89.00 feet to the iron pin point of beginning.

TRACT 3:

All that tract or parcel of land situate, lying and being in the Toccoa (440) G.M.D., Stephens County, Georgia, in the City of Toccoa, lying on the South and Southeast right-of-way of West Doyle Street and being known and designated as **TRACT 3, CONTAINING 0.370 ACRE, more or less**, on a plat of survey for Coats America, Inc. by Michael J. Smith, RLS, dated April 4, 1998, recorded in Plat Book 17, Page 237B, Stephens County Plat Records, the description as contained therein being incorporated herein by reference and being more particularly described as follows: **BEGINNING** at a point on the South right-of-way of West Doyle Street with an iron pin set South 04 degrees 28 minutes West 7.39 feet from said right-of-way, which iron pin is 292.6 feet West of the intersection of the right-of-way of West Doyle Street with the right-of-way of Oak Street; thence running along now or formerly Coats America property South 04 degrees 28 minutes West 116.43 feet to an iron pin set; thence continuing along now or formerly Coats America property North 85 degrees 58 minutes West 122.48 feet to an iron pin set and North 70 degrees 20 minutes West 65.33 feet to an iron pin set on the Southeast side of a sidewalk adjacent to West Doyle Street; thence running along the Southeast and South edge of the sidewalk on the Southeast and South side of West Doyle Street North 44 degrees 06 minutes East 57.06 feet, North 51 degrees 27 minutes East 56.76 feet, North 81 degrees 20 minutes East 68.94 feet, and South 88 degrees 13 minutes East 40.53 to the point of beginning.

TRACT 4:

All that tract or parcel of land situate, lying and being in the Toccoa (440) G.M.D., Stephens County, Georgia, in the City of Toccoa, lying on the North right-of-way of West Savannah Street Ext. (not open), on the Southeast right-of-way of Braswell Street, and on the West right-of-way of Clark Street and **being known and designated as TRACT 4, CONTAINING 11.80 ACRES, more or less**, on a plat of survey for Coats & Clark, Inc. by Michael J. Smith, RLS, dated October 19, 1998, revised November 2, 1998, recorded in Plat Book 17, Page 238, Stephens County Plat Records, the description as contained therein being incorporated herein by reference and being more particularly described as follows:

BEGINNING at the Northwest intersection of the right-of-way of Clark Street with West Savannah Street Ext. (not open); thence running along the North right-of-way of West Savannah Street Ext. (not open) North 87 degrees 11 minutes West 1,323.87 feet to a point on the Southeast right-of-way of Braswell Street; thence running along the Southeast right-of-way of Braswell Street in a Northeastern direction the courses and distances as shown on the above described plat a total of 660.43 feet to an iron pin found; thence leaving Braswell Street and running North 88 degrees 08 minutes East 59.65 feet to an iron pin found, South 20 degrees 18 minutes East 183.04 feet to an iron pin found, and North 87 degrees 47 minutes East 835.85 feet to an iron pin found on the West right-of-way of Clark Street; thence running along the West right-of-way of Clark Street South 01 degree 43 minutes East 157.17 feet to an iron pin found and South 02 degrees 11 minutes East 319.69 feet to the point of beginning.

TRACT 5:

All that tract or parcel of land situate, lying and being in the Toccoa (440) G.M.D., Stephens County, Georgia, in the City of Toccoa, lying on the East right-of-way of Clark Street and **being known and designated as TRACT 5, CONTAINING 0.54 ACRE, more or less**, on a plat of survey for Coats & Clark, Inc. by Michael J. Smith, RLS, dated October 19, 1998, revised November 2, 1998, recorded in Plat Book 17, Page 238, Stephens County Plat Records, the description as contained therein being incorporated herein by reference and being more particularly described as follows: **BEGINNING** at an pin set on the East right-of-way of Clark Street as shown on the above described plat; thence running North 87 degrees 49 minutes East 99.99 feet to an iron pin found, North 02 degrees 11 minutes West 47.00 feet to a point, North 88 degrees 39 minutes East 30.00 feet to a point, South 07 degrees 24 minutes East 210.49 feet to a point and North 87 degrees 11 minutes West 149.75 feet to a point on the East right-of-way of Clark Street; thence running along the East right-of-way of Clark Street North 02 degrees 11 minutes 150.00 feet to the iron pin point of beginning.

TRACT 6:

All that tract or parcel of land situate, lying and being in the Toccoa (440) G.M.D., Stephens County, Georgia, in the City of Toccoa, lying on the West right-of-way of North Pine Street, on the South right-of-way of West Savannah Street (not open), and on the Northeast right-of-way of Clark Street and **being known and designated as TRACT 6, CONTAINING 1.18 ACRES, more or less**, on a plat of survey for Coats & Clark, Inc., by Michael J. Smith, RLS, dated October 26, 1998, recorded in Plat Book 17, Page 239A, Stephens County Plat Records, the description as contained therein being incorporated herein by reference and being more particularly described as follows: **BEGINNING** at the point of intersection of the 50 feet East right-of-way of North Pine Street with the Northeast 30 feet right-of-way of Clark Street; thence running along the Northeast right-of-way of Clark Street the courses and distances as shown on the above described plat 257.03 feet to an iron pin found on the North right-of-way of Clark Street; thence leaving Clark Street and running North 68 degrees 13 minutes East 67.45 feet to an iron pin found; thence running North 21 degrees 17 minutes West 229.31 feet to an iron pin set; thence running South 68 degrees 57 minutes West 87.13 feet to an iron pin found along the East right-of-way of Clark Street; thence running along the East right-of-way of Clark Street North 05 degrees 52 minutes East 74.70 feet to the point of intersection of the East right-of-way of Clark Street with the South right-of-way of West Savannah Street (not open); thence running along the South right-of-way of West Savannah Street (not open) South 87 degrees 11 minutes East 252.54 feet to the point of intersection of the South right-of-way of West Savannah Street (not open) with the West right-of-way of North Pine Street; thence running along the West right-of-way of North Pine Street South 03 degrees 49 minutes West 451.35 to the point of beginning.

TRACT 7A:

All that tract or parcel of land situate, lying and being in the Toccoa (440) G.M.D., Stephens County, Georgia, in the City of Toccoa, lying on the Northeast, North and Northwest right-of-way of West Doyle Street and on the Southwest right-of-way of Clark Street and **being known and designated as TRACT 7A, CONTAINING 4.93 ACRES, more or less**, on a plat of survey for Coats & Clark, Inc., by Michael J. Smith, RLS, dated October 26, 1998, recorded in Plat Book 17, Page 239A, Stephens County Plat Records, the description as contained therein being incorporated herein by reference and being more particularly described as follows: **BEGINNING** at the Northeast most corner of Building 1 as shown on the above described plat which coincides with the West right-of-way of Clark Street; thence from said corner run South 24 degrees 41 minutes East 9.31 feet, South 06 degrees 07 minutes West 46.32 feet, South 10

degrees 54 minutes East 37.19 feet, South 33 degrees 28 minutes East 31.06 feet, South 42 degrees 54 minutes East 92.51 feet, South 40 degrees 54 minutes East 30.88 feet, and South 18 degrees 03 minutes East 38.11 feet to the Northwest intersection of the right-of-way of West Doyle Street with the Southwest right-of-way of Clark Street; thence running along the Northwest, North, and Northeast right-of-way of West Doyle Street the courses and distances as shown on the above described plat 789.51 feet to an iron pin set at the Westernmost point of the within Tract 7A with the North right-of-way of West Doyle Street; thence running from West Doyle Street North 22 degrees 35 minutes East 514.67 feet to an iron pin found at the Northernmost point of the within Tract 7A; thence running South 21 degrees 04 minutes East 229.00 feet to an iron pin found and North 68 degrees 57 minutes East 90.00 feet to an iron pin found on the Southwest right-of-way of Clark Street; thence running along the Southwest and South right-of-way of Clark Street South 22 degrees 31 minutes East 26.34 feet, South 38 degrees 08 minutes East 29.41 feet, South 82 degrees 12 minutes East 11.98 feet, South 83 degrees 53 minutes East 62.00 feet, and South 72 degrees 27 minutes East 8.99 feet to point of beginning at the Northeast corner of Building 1 as shown on the above described plat.

TRACT 7B:

All that tract or parcel of land situate, lying and being in the Toccoa (440) G.M.D., Stephens County, Georgia, in the City of Toccoa, lying on the East right-of-way of Braswell Street, on the South right-of-way of West Savannah Street Ext. (not open) and the North right-of-way of West Doyle Street and **being known and designated as TRACT 7B, CONTAINING 12.80 ACRES, more or less**, on a plat of survey for Coats & Clark, Inc. by Michael J. Smith, RLS, dated October 19, 1998, revised November 2, 1998, recorded in Plat Book 17, Page 238, Stephens County Plat Records, the description as contained therein being incorporated herein by reference and being more particularly described as follows:

BEGINNING at an iron pin set at the Northeast intersection of the rights-of-way of Braswell Street and West Doyle Street; thence running North 09 degrees 54 minutes West 181.48 feet to a concrete marker on the East right-of-way of Braswell Street; thence continuing along the East right-of-way of Braswell Street in a Northern direction the courses and distances as shown on the above described plat for a total of 351.44 feet to the intersection of said East right-of-way of Braswell with the South right-of-way of West Savannah Street Ext. (not open); thence running along the South right-of-way of West Savannah Street Ext. (not open) South 87 degrees 11 minutes East 1,365.12 feet to the point of intersection of the South right-of-way of West Savannah Street Ext. (not open) with the West right-of-way of Clark Street; thence running along the West right-of-way of Clark

Street South 05 degrees 52 minutes West 26.95 feet to an iron pin found, South 68 degrees 57 minutes West 127.07 feet to an iron pin found and South 22 degrees 35 minutes West 514.67 feet to an iron pin set on the North right-of-way of West Doyle Street; thence running along the North right-of-way of West Doyle Street the courses and distances as shown on the above described plat a total of 1,116.97 feet to the iron pin point of beginning.

TRACT 8A:

All that tract or parcel of land situate, lying and being in the Toccoa (440) G.M.D., Stephens County, Georgia, in the City of Toccoa, lying on the North right-of-way of Norfolk Southern f/k/a Southern Railroad property and on the Southwest right-of-way of West Doyle Street and **being known and designated as TRACT 8A, CONTAINING 0.89 ACRE, more or less**, on a plat of survey for Coats & Clark, Inc., by Michael J. Smith, RLS, dated October 26, 1998, recorded in Plat Book 17, Page 239A, Stephens County Plat Records, the description as contained therein being incorporated herein by reference and being more particularly described as follows: **BEGINNING** at the point of intersection of the North right-of-way of said railroad and the Southwest right-of-way of West Doyle Street as shown on the above described plat; thence running along the North right-of-way of said railroad property North 87 degrees 10 minutes West 338.61 feet to an iron pin set; thence running from said railroad North 01 degrees 35 minutes East 195.50 feet to an iron pin set on the Southwest right-of-way of West Doyle Street; thence running along the Southwest right-of-way of West Doyle Street the courses and distances as shown on the above described plat a total of 412.94 feet to the point of beginning.

TRACT 8B:

All that tract or parcel of land situate, lying and being in the Toccoa (440) G.M.D., Stephens County, Georgia, in the City of Toccoa, lying on the Southeast right-of-way of West Doyle Street and on the North right-of-way of Norfolk Southern f/k/a Southern Railroad property and **being known and designated as TRACT 8B, CONTAINING 3.68 ACRES, more or less**, on a plat of survey for Coats & Clark, Inc. by Michael J. Smith, RLS, dated October 19, 1998, revised November 2, 1998, recorded in Plat Book 17, Page 238, Stephens County Plat Records, the description as contained therein being incorporated herein by reference and being more particularly described as follows: **BEGINNING** at an iron pin set on the North right-of-way of Norfolk Southern f/k/a Southern Railroad property adjacent to Tract 8A as shown on the above described plat; thence running along the North right-of-way of said railroad property North 87 degrees 10 minutes West 505.58 feet to a point with an iron pin found 11 feet South 04 degrees 31 minutes

West 11 feet within said right-of-way; thence running from said point on the North right-of-way of said railroad property North 04 degrees 31 minutes East 250.07 feet to an iron pin found and North 87 degrees 17 minutes West 250.81 to an iron pin found on the Southeast right-of-way of West Doyle Street; thence running along the Southeast, South and Southwest right-of-way of West Doyle Street the courses and distances as shown on the above described plat a total of 797.60 feet to an iron pin set adjacent to Tract 8A as shown on the above described plat; thence running along Tract 8A South 01 degrees 35 minutes West 195.50 feet to the iron pin point of beginning.

The within conveyance of the aforesaid tracts of property from Grantor, Coats & Clark Inc., to Grantee, Toccoa Country Club, Inc., is made subject to the exceptions set out on Exhibit "A" attached hereto.

TO HAVE AND TO HOLD the said bargained premises, 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 TOCCOA COUNTRY CLUB, INC., the said Party of the Second Part, Grantee, its successors and assigns forever, in Fee Simple.

And the said Party of the First Part, Grantor, for itself, its successors and assigns, will warrant and forever defend the right and title to the above described property unto the said Party of the Second Part, Grantee, its successors and assigns, against the lawful claims of the Party of the First Part, COATS & CLARK INC., and all other claims by, from, through, and under, the Party of the First Part as Grantor.

IN WITNESS WHEREOF the said Party of the First Part as Grantor has hereunto set its hand and affixed its seal by and through its duly authorized officers the day and year first above written.

COATS & CLARK INC.

By: Donna Armstrong
Donna Armstrong, Vice President

Attest: Alan W. DeMello
Alan W. DeMello, Assistant Secretary

Signed, sealed and delivered
in the presence of:

(Corporate Seal)

Connie P. Burlison
Unofficial Witness

CORPORATE SEAL AFFIXED

Theresa R. St. Martin
Notary Public

NOTARY PUBLIC SEAL AFFIXED

EXHIBIT "A"

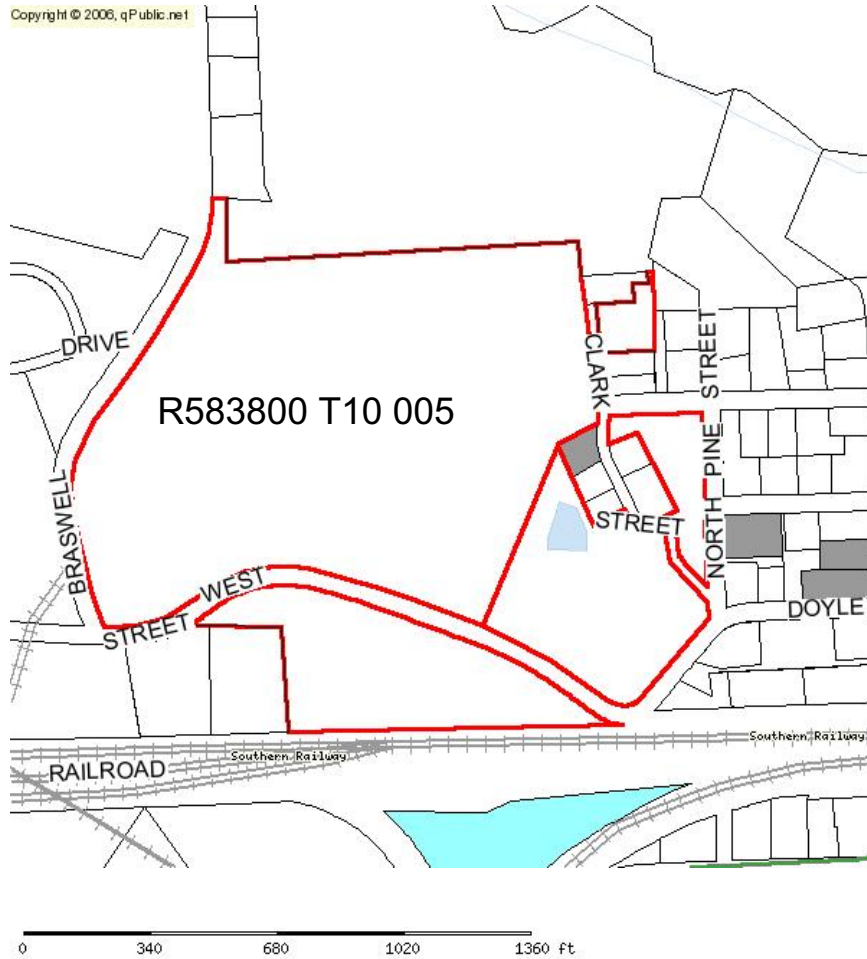
EXCEPTIONS TO LIMITED WARRANTY DEED, DATED SEPTEMBER 10, 2004, FROM COATS & CLARK INC. TO TOCCOA COUNTRY CLUB, INC.

1. All State of Georgia and Stephens County ad valorem taxes, assessments and similar charges for the year 2004 and subsequent years.
2. All City of Toccoa, Georgia, taxes, assessments and similar charges for the year 2004 and subsequent years.
3. Easements granted for water, sewer and/or gas to the City of Toccoa, both recorded and unrecorded.
4. Easements for telephone lines, poles and related equipment granted to Alltel and its predecessor companies including General Telephone Company, both recorded and unrecorded.
5. Easements granted to Georgia Power Company for electrical power distribution including lines, poles, transformers and related equipment, both recorded and unrecorded.
6. Easements and rights-of-way for public roads and streets, both recorded and unrecorded.
7. The right, if any, of the City of Toccoa to open that part of West Savannah Street a/k/a West Savannah Street Extension and to utilize the right-of-way as a street, which right-of-way is more fully described on that plat of survey for Coats & Clark, Inc. by Michael J. Smith, RLS, dated October 19, 1998, revised November 2, 1998, describing Tracts 4, 5, 7B, and 8B.
8. Claims of adverse possession, if any, by adjoining property owners or others which are not based upon deeds of record but are based upon a claim of actual possession of the property.

9. Any and all riparian rights of others in and to any creeks, rivers, lakes, streams, swamps, ponds and other bodies of water located on or adjoining the subject property or any part thereof.
10. Any and all claims of the sovereign or any other person or entity with respect to portions of the subject property which border or are under any body of water.
11. Any and all cemeteries on the subject property.
12. Any and all road, railroad, utility, pipeline, drainage, flowage, access or other easements or rights-of-way affecting the subject property.
13. Any and all matters which would be disclosed by a current survey or inspection of the subject property.
14. Any and all prior reservations, conveyances, grants or leases of minerals of whatever kind or character (including, without limitation, oil, gas, coal, lignite, clay, sand, gravel, rock, aggregate, and other minerals) located in, on or under the subject property or any part thereof and all rights and easements with respect to the exploration, mining, drilling, extraction, removal, and production of such minerals.
15. All matters of record.

Appendix B

Tax Plat



Source: Stephens County, GA Tax Assessor



Tax Map
Former Coats & Clark Plant 1, Toccoa, GA

Figure
B-1