

Corrective Action Plan Modification

**Welcome Years, Inc.
Atlanta, Georgia
HSI # 10637**

AEM Project No. 1396-1401-8

June 30, 2015

Prepared For:

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GROUNDWATER SCIENTIST STATEMENT

I certify that I am a qualified groundwater scientist who has received a baccalaureate or postgraduate degree in the natural sciences or engineering and have sufficient training and experience in groundwater hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport. I further certify that this report was prepared by me and by appropriate qualified subordinates working under my direction.

Victor Owens 6-30-2015

Victor Owens, P.E.

Registration No.



SECTION 1.0 INTRODUCTION

1.1 SITE DESCRIPTION

The subject property is designated as the Welcome Years, Inc., Hazardous Sites Inventory (HSI) Site No. 10637, owned by VLP 2, LLC (VLP2). The subject property consists of four parcels located southeast of the intersection of 14th Street NW and Howell Mill Road in Land Lot 150, 17th District, in the City of Atlanta, Fulton County, Georgia. These parcels are located at the following addresses:

- 1115 Howell Mill Road (“the Howell Mill parcel”)
- 673 Ethel Street (“the Ethel Street parcel”)
- “0” and 720 14th Street (“the 14th Street parcels”)

A location map for the subject property is provided as Figure 1. The subject property is approximately 8.8 acres in size and is bordered on the north by 14th Street, on the west by Howell Mill Road, on the south by the former Iron Works International, Inc. (1085 Howell Mill Road) and other commercial properties along Howell Mill and 11th Street, and on the east by the Ben Massell Dental office (700 14th Street), Applied Research Services (663 Ethel Street), and a warehouse building (654 Ethel Street). A site plan depicting locations of on-site and off-site structures, utilities, and groundwater monitoring wells is included as Figure 2.

As of the date of this document, the Howell Mill Road parcel of the Welcome Years site, previously leased to United Rentals, Inc., is currently unoccupied. In addition, the 14th Street parcel previously occupied by Barking Hound Village Westside is now vacant. The Ethel Street parcel is currently occupied by Trendco-Vick Wholesale. For the last few years the Trendco-Vick Wholesale facility has continued as a month-to-month lease, and there is potential for another tenant to occupy the Howell Mill parcel in the near future.

1.2 VOLUNTARY REMEDIATION PROGRAM STATUS

A Voluntary Investigation and Remediation Plan (VIRP) was submitted by VLP2 for acceptance into the Voluntary Remediation Program (VRP) on December 1, 2011. After revisions and refinements requested by the Georgia Environmental Protection Division (EPD), the VIRP was approved by EPD on November 2, 2012. Five semiannual progress reports have been submitted, with the latest being dated May 1, 2015.

The corrective actions prescribed in the approved VIRP, primarily engineering and institutional controls, were appropriate for the projected land use projected at that time (2011–2014). VLP2 has now updated the planned use of the property and intends to redevelop the subject property into a multi-story mixed use complex. Construction is anticipated to start in the first or second quarter of 2016, consisting of three overlapping phases of construction. Attachment A depicts the current planned redevelopment layout, which includes deep parking structures requiring a large volume of soil removal with off-site disposal.

SECTION 2.0 CORRECTIVE ACTION

2.1 REDEVELOPMENT OVERVIEW

The current plans for redevelopment of the property generally consist of mixed use development (i.e., buildings and roadways) to be conducted in multiple phases spanning several years. There is very little, if any, greenspace or landscaping currently associated with this layout. The engineering and construction permitting for this layout is currently in the early planning stages. The final designs for foundations and other subterranean components such as storm water retention, storm water conveyance easements, and utility trenches, have not yet been completed and may require coordination with the requirements of this CAP.

The final layout of roads and parking, the final depth and extent of deep foundations, and areas for landscaping may change to resolve permit requirements, such as locating underground storm water cisterns. Therefore some reconfiguration and optimization for traffic and structure layout may occur compared to the current plan. However, the final layout, including all associated soil displacement, does not change the corrective action planning in this CAP. In general, some of the known impacted soil (see Figure 3) will need to be removed to make way for new structures.

Select excavated soil may be suitable for reuse in the redevelopment grading. It is anticipated that the grading portion of the redevelopment will include approximately 2,000 cubic yards of fill material and nearly 52,000 cubic yards of excavation, which will result in a net removal of roughly 50,000 cubic yards after all three phases of redevelopment are completed. The installation of new paved surfaces, combined with structure footprints, utilizes approximately 95% of the current property surface.

2.1.1 Cleanup Goals and RRS

Regulated substances detected in soil at the property and detailed in the VIRP consist of VOCs and metals. VOCs detected in soil are limited to acetone, cyclohexane, and ten petroleum hydrocarbons (benzene, toluene, ethylbenzene, m,p-xylenes, o-xylene, chlorobenzene, isopropylbenzene, 1,2-dichlorobenzene, 1,3-dichlorobenzene, and 1,4-dichlorobenzene). The detected metals are arsenic, barium, cadmium, chromium, lead, mercury, and silver. These regulated substances are constituents of concern (COCs) for the soil at the subject property.

In the VIRP application, AEM calculated Type 1 and Type 2 RRS for the soil contaminants of concern (COCs), and summarized all COC data for soil and groundwater. Because the subject property is expected to be used as a mixed residential and commercial setting, Type 3 and Type 4 (nonresidential) RRSs were not calculated. Figure 3 shows the location of soil samples and the aerial extent of COCs. Figure 4 summarizes the location of groundwater samples and the extent of tetrachloroethene (PCE), the predominant COC in groundwater, as of 2014.

The detected COCs for soil at the subject property are listed in Tables 1 through 3, along with their associated Type 1 RRS. Note that Tables 1 through 3 include Type 2 RRSs where COC concentrations exceeded the Type 1 RRS.

The COCs benzene, chlorobenzene, lead, arsenic, barium, cadmium, and silver have been detected at concentrations exceeding the greater of Type 1 and Type 2 RRS. Typically, the occurrences of COCs at concentrations exceeding the RRS are limited to single or limited locations, with the exception of lead and, to a lesser extent, cadmium. Lead and cadmium concentrations exceeding the RRS occur over a large area (approximately 50% of the property) and typically in a visually identifiable dark/black fill material. In Attachment A, the approximate extent of black fill is overlaid onto the current redevelopment plan.

Because of the extent of future hardscape coverage, AEM believes that a Type 5 RRS could apply to most or all of the affected portions of the redevelopment. However, because of the depth and extent of excavation required for construction, it may be feasible to verify and certify Type 1 or Type 2 RRS on individual parcels, depending on the final extent of construction excavation.

The corrective action that will be implemented at the subject property in large part will be the direct result of excavations, paving, and barriers that are required in order to construct the planned redevelopment. The methods that will be used for achieving the associated RRSs are discussed in the following subsections.

2.1.2 Soil Remediation Options

Due to the size and subsurface structures of this redevelopment, there will be several methods employed to remove and dispose of impacted soil or to otherwise permanently control exposure to human health and the environment. These will generally include one or more of the following:

- a. Simple excavation with off-site disposal at an approved landfill.
- b. On-site treatment to prepare hazardous soil for disposal as non-hazardous waste.
- c. Placement under a permanent cover that meets certain requirements to prevent exposure to human health or the environment.

Figure 5 overlays the preliminary redevelopment footprint with site features and the Type 1 RRS limits for lead in soil. Some of the current soil sampling data indicate that a limited percentage of the grading waste soil has the potential to exceed Toxicity Characteristic Leaching Procedure (TCLP) criteria and would therefore require disposal as hazardous waste unless treated to remove the hazardous characteristic.

One option for facilitating redevelopment is to separate the hazardous material remediation from nonhazardous regulated waste, which is a two-step process.

The first step will consist of preconstruction exploratory soil sampling and field testing (i.e., x-ray fluorescence) to locate the hot spots. Once the hot spots are located, the second step will consist of on-site treatment to treat the soil so that it is no longer hazardous (i.e., does

not fail TCLP). Subsequently, and later when grading starts, the treated soil can then be shipped off site as a special waste or left on site within the treatment area.

The methods that will be used to remove and dispose of impacted soil, including soil containing hazardous concentrations of COCs, are described in more detail in the following sections.

2.1.2.1 *Excavation with Off-Site Disposal*

It is estimated that approximately 50,000 net cubic yards of soil will require removal in order to facilitate the redevelopment. Most of the known impacted soil volume exceeding the Type 1 RRS is planned for off-site disposal as a regulated non-hazardous waste. These excavations will be implemented as a soil remediation effort that will include the following:

1. Excavation water management (storm and groundwater) as potentially containing COCs at regulated levels that must be treated prior to discharge.
2. Decontamination of vehicles leaving the site that have been in contact with impacted soil.
3. Implementation of an Environmental Construction Management Plan (ECMP) in accordance with Section 3 of this CAP.
4. Excavation sidewall sampling at a frequency of 30-foot intervals along sidewalls or every 300 square feet of sidewall exposure, whichever is greater, and every 900 square feet of excavation bottom.
5. Sampling methods that follow the guidance provided in Region IV, USEPA operating procedure SESDPROC-300-R3.
6. Collection of sufficient quantity and quality of data to facilitate certification to the respective RRS associated with the specific excavation area and parcel.
7. All existing monitoring wells located in potential excavation areas will be properly abandoned in accordance with Region IV, USEPA operating procedures, prior to excavation activities.

Any soil generated will be stockpiled for controlled loading into dump trucks or, alternatively, may be directly loaded into dump trucks where supported by the waste profile. Stockpiles will generally be created near or within the excavation and will be covered pending transportation to an appropriate disposal facility. In general, all disturbed soil, including stockpiles, will be managed to prevent any contact with storm water, per an approved Environmental Construction Management Plan.

All remediation will be conducted in accordance with applicable OSHA regulations and a site-specific Health and Safety Plan and in a manner that protects the surrounding environment (water, uncontaminated soil, and air).

2.1.2.2 Treatment Prior to Off-Site Disposal

Both rough and final site grading of Phase 1 and Phase 2, and possibly parts of Phase 3, may encounter soil that exceeds TCLP criteria, particularly for lead. This is also the case for installation of foundation piers, utility trenches, and any storm water cisterns. Therefore, before any soil-disturbing activities begin, hot spots will be located and treated such that the soil can then be managed and disposed as non-hazardous. Soil sampling for the purpose of locating the hot spot boundaries will use simple direct-push methods and field test kits. Then, treatment will consist of thoroughly mixing the hot spot soil with binding agents that reduce the likelihood of soil having hazardous characteristics, particularly leachable lead. This step will simplify construction scheduling and will reduce waste soil disposal costs.

Soil stabilization requires methods and machinery that finely mix and integrate a stabilizing agent such as Portland cement or tri-sodium phosphate with the target soil at a predefined dosage. The stabilization dosage is typically in the range of 3% by mass on a dry basis, and it is usually predetermined by scaled bench testing to reduce the need for retreatment costs. The soil can be treated in place, tested, and left for later removal or possible reuse under roads or other hardscape. Alternatively, the soil could be mixed on site but away from the excavation in roll-offs, or possibly in a pug mill, but not in an uncontained area such as a soil pit. Generally, treatment in place reduces the need to control spreading by spillage or storm water.

In some locations of the property the depth of potentially hazardous soil exceeds 15 feet below surface. Because of the depth of impacted soil, it may be necessary to remove or treat the soil in lifts of approximately 3 to 4 feet. The treated lifts will be removed and consolidated, then tested by TCLP, and then temporarily stockpiled while the next lift is treated. Once the target soil is rendered non-hazardous it can be returned to the excavation or loaded for disposal. Treated soil that will need to be disposed off site will be waste profiled for disposal at an approved landfill.

All treated material will be logged and tested by either TCLP or Synthetic Precipitation Leaching Procedure (SPLP) for preparation of either on-site reuse or off-site disposal.

2.1.2.3 Type 5 Cap

The VRP rules allow the Applicant to select from among several concentration criteria to demonstrate delineation of the extent of impacted soil. The lateral and vertical extent of impacted soil for this property has previously been delineated based on the default residential cleanup standards (i.e., Type 1 RRS). For the COCs at this property, the Type 1 RRS are shown in the following table.

Constituent	Delineation Standard (mg/kg)
Benzene	0.5
Chlorobenzene	10
Arsenic	20
Barium	1,000
Cadmium	2
Chromium	100
Lead	75
Mercury	0.5
Silver	2

The Type 1 RRS is the anticipated remediation goal for the majority of the property. However, for those areas of the property that cannot be certified to Type 1 RRS or Type 2 RRS, a Type 5 RRS with Uniform Environmental Covenant (UEC) will be the default certification criteria.

To achieve Type 5 RRS, a barrier technology (either permanent hardscape or minimum two-foot stable and vegetated landscape soil cover) “cap” will be placed over the non-hazardous areas of the subject property that do not meet Type 1 or Type 2 RRSs. This engineering control will consist of a permanent cap over impacted soils to prevent future leaching of impacted soils into the groundwater and mitigation methods (i.e., passive vapor systems) for the intrusion of vapors from groundwater at unacceptable levels into the overlying planned structures. The cap will consist of concrete building slabs, concrete pavement (i.e., walkways/sidewalks, driveways), and surrounding asphalt parking areas and roads. In the areas designated as Type 5, the ground surfaces will be covered with a minimum of four inches of concrete or other impervious cover, to protect against direct exposure to impacted media and to limit surface water infiltration.

Soil sampling will be conducted to confirm the vertical and horizontal extent of the Type 5 cap area(s). A registered land surveyor will survey the limits of the Type 5 area(s) to document the extent of the Type 5 area(s) and a permanent marker will be installed and maintained at each area to delineate the restricted area.

2.1.2.4 Deed Restriction and Environmental Covenant

In order to maintain an impervious cap over the impacted soil area where Type 5 RRS is appropriate, a legal notice will be placed on the property deed to ensure the following:

- Excavation or other disturbance of the materials beneath the cap, except for necessary and unavoidable utility work to be performed under a site-specific HASP and with Georgia EPD notification.
- Proper notification and EPD approval for removal, destruction, or demolition of the building concrete slabs, footings, and asphalt parking areas used to cap affected soil.
- A UEC is executed requiring long-term maintenance and monitoring of the engineering controls for the property per Georgia Rule Section 391-3-19-.08(7) of the Rules for Hazardous Sites Response. (The environmental covenant is provided in O.C.G.A. 44-16-1.)
- The covenant shall be recorded with the Clerk for Fulton County Superior Court and a copy shall be provided to the City of Atlanta Bureau of Planning and to the Zoning Division of the Bureau of Buildings. The UEC shall run with the land and be binding on the property owner's successors and assigns. In accordance with Rule 391-3-19-.08(7), the UEC will be prepared by VLP 2, LLC, and may include, but not necessarily be limited to, those provisions listed in Rule 391-3-19-.08(7). VLP 2, LLC, will work with Georgia EPD to satisfy any other requirements or concerns regarding the deed notice and environmental covenant.

2.1.3 CAP Implementation Sequence

The corrective action will be implemented according to a critical path sequence of activities that takes into consideration pre-construction soil hot spot treatment, followed by construction grading that includes non-hazardous soil remediation. This sequence assumes that there will be initial preparation of the property for construction by selectively remediating the soil hot spots. The sequence indicates the need to carefully plan and integrate both construction and remediation schedules.

This sequence generally lays out the relation to the phases of redevelopment to final certification in the CSR. This sequence may change based on permit conditions or where the schedule for each phase of redevelopment changes, and it is likely to progress more quickly once final construction permits are issued and work starts. The redevelopment duration is assumed to be a maximum of approximately 60 months from approval of this CAP Modification Report, and the CAP Implementation Sequence is provided to illustrate where the remediation schedule and redevelopment construction schedule are synchronized, at a very high level. A much more detailed schedule will be developed once the final construction schedule is completed. Corrective Action milestone dates are provided in the Preliminary CAP and CSR Milestone Schedule provided in Section 4 of this Plan. The following summarizes the CAP Implementation sequence.

1. CAP submitted and accepted
2. Final redevelopment layouts with grading plans
3. Construction schedule: Redevelopment Phase 1, 2, and 3 finalized
4. Construction permits for preliminary remediation
5. Hotspot *in situ* treatment where needed (simultaneous with Step 6)
6. Final Phase 1 engineering completed, permit for construction (simultaneous with Step 5)
7. Finalization of a coordinated grading/remediation plan with schedule
8. Environmental Construction Management Plan (ECMP) implemented
9. Start of Phase 1 clearing, site preparation, and grading
10. Grading, excavation and disposal, testing
11. Merge of Phase 1 remediation and grading into Phase 2 of redevelopment
12. Merge of Phase 2 remediation and grading into Phase 3 of redevelopment
13. VRP CSR submitted

SECTION 3.0

ENVIRONMENTAL CONSTRUCTION MANAGEMENT

3.1 ECMP REQUIREMENTS

As part of the implementation of this CAP, and before groundbreaking can begin, an Environmental Construction Management Plan (ECMP) will be prepared and implemented. The ECMP is intended to plan for the combined efforts of redevelopment with regulated waste management. The ECMP generally provides for:

1. Training and documentation required by OSHA for workers on property containing hazardous waste and regulated waste.
2. Means and methods to control waste and to prevent inadvertent spreading.
3. Means and methods to monitor the surrounding areas to prevent off-site impacts and document the absence of off-site impacts.

The ECMP will include the following components:

3.1.1 Environmental Health and Safety Plan (EHASP)

The EHASP describes the required worker safety procedures and will provide for worker exposure monitoring in areas of known contamination. Exposure monitoring includes using OSHA methods, and the laboratory analysis of personal monitoring samples for lead and other constituents as deemed appropriate by a qualified safety professional. Test results will be compared to OSHA Permissible Exposure Limits (PELs) at a frequency appropriate to avoid unacceptable worker exposure.

3.1.2 Decontamination Practices

In addition to the permit-required construction entrance(s), provisions for decontamination of vehicles leaving the subject property will be incorporated into the construction. Decontamination practices will be utilized to minimize incidental spillage or tracking onto public streets from dumps and to prevent the spread of contaminated soil into otherwise clean or remediated areas of the construction site.

3.1.3 Storm and Excavation Water Sampling

Water from excavations or detention areas will be routinely tested to demonstrate that chemical constituents are below regulatory thresholds for discharge to surface flows leaving the subject property.

3.1.4 Perimeter Dust Monitoring

Air samples will be collected in accordance with a prescribed layout and frequency to reasonably demonstrate that regulated site constituents are not leaving the property boundary above acceptable thresholds for public and environmental exposure.

3.1.5 Waste Characterization and Disposal Records

Regulated waste streams leaving the site will be transported by a licensed waste hauler to a disposal facility/landfill that is properly licensed for the specific waste. The frequency and waste characterization analyses for the purpose of proper disposal will be based on the specific requirements of the disposal facility but will include at a minimum the known site constituents. Regulated waste from the subject property will not be transported off site for reuse as fill and will not otherwise be disposed at any facility other than a properly licensed facility. Records of disposal accounting for the final disposition of all regulated waste will be retained and tallied and will account for all regulated waste disposal.

3.1.6 Facility Soil Management Plan

A plan and procedure that prevents the disturbance and exposure of site constituents beneath engineering controls such as paving, foundations, landscape/soil covers, and similar constructed barriers will be developed for the benefit of future occupants. The plan must effectively mitigate, to the extent practical, inadvertent human and environmental exposure resulting from customary property maintenance that penetrates any protective barriers. This Facility Soil Management Plan will include signage, notifications, and durable, permanent plaques and markers as appropriate relative to any Uniform Environmental Covenants, with contact information, to prevent unauthorized subsurface work.

3.1.7 Third-Party Inspections and Reporting/Documentation

Implementation of the ECMP will be inspected on a schedule that is appropriate for the type of work activity. The inspections will be focused primarily during soil disturbance activities of construction. The inspections will be conducted by a third party with the qualifications (Certified Industrial Hygienist, Licensed Engineer, or other State licensed environmental professional) to provide independent certification of the veracity and applicability of the data relative to preventing contaminant exposure to human and environmental receptors.

3.1.8 ECMP Summary Report

A summary document will be provided to the redevelopment stakeholders that compiles the environmental data, observations, and records of third-party inspections and related documents. This document will be certified by a qualified environmental professional licensed in the State of Georgia.

SECTION 4.0 MILESTONE SCHEDULE

The schedule for implementation of the CAP Amendment is based on an estimated four-year development schedule, where phases of development will overlap. The completion of the final phase is expected to occur 60 months following approval of this CAP Modification. Status Reports will be submitted to Georgia EPD every 6 months during the implementation period until the final VRP CSR is submitted. Note that, as the development advances and soil is removed, the volume of removal may alter the Conceptual Site Model (CSM), particularly related to groundwater. Therefore, semiannual status reports will include the following:

- Updates of the CSM resulting from soil removal or deep foundation installation
- Engineering details and configuration of Type 5 barriers
- Spatial relationship relative to remaining soil impacted with COCs
- CAP implementation schedule updates

The preliminary schedule for completing the CAP implementation and CSR submittal is summarized below:

4.1 PRELIMINARY CAP AND CSR MILESTONE SCHEDULE

Milestone	Completion Date	Notes
Soil Survey	May 2016	Locate soil above TCLP
Final Plans	September 2016	Rezoning
Permits	January 2017	Construction Permitting
Soil Treatment	September 2017	Prep for Phase 1 Grading
Phase 1 Grading	December 2017	Phase 1 to merge into Phase 2
Phase 2 Grading	December 2018	Phase 2 to merge into Phase 3
Optional Parcel CSR	After Phase 1	As appropriate for Type 1
Phase 3 Grading	December 2019	Phase 3 earth work completed
VRP CSR Submittal	June 2020	All excavations and trenches sampled
100% Completion	December 2020	Property occupied by tenants

It should be noted that VLP2 may submit individual CSRs for each parcel certifying compliance with appropriate RSSs where redevelopment and/or remediation has been completed. The intent of staging these submittals is to enable EPD to review and approve the

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redevelopment and concurrent remediation as it is completed for each parcel and, upon approval, incrementally de-list the parcels from the HSI/VRP.

SECTION 5.0 COST

The following summarizes the estimated incremental cost to implement this CAP. These are the additional costs that are expected to be incurred only by implementing this CAP but would otherwise not be incurred if the property did not require environmental remediation. In addition, costs for future years of environmental maintenance, such as annual sampling, inspections and reports required under a Uniform Environmental Covenant, and estimated future soil management costs resulting from subgrade repairs and improvements, are also included. These costs are intended to represent the entire incremental cost associated with development and management of this property compared to a hypothetical identical property that does not have significant environmental impairments.

5.1 SUMMARY OF CAP IMPLEMENTATION COST (BUDGETARY COSTS)

Cost Item	Quantity	Unit	Unit Cost	Subtotal	Explanation
HAZWOPER Requirements	1	Each	\$127,000	\$127,000	Worker premium OSHA training (i.e., 40-hour, supervisor), daily tail gate meetings, records, medical monitoring (i.e., blood tests for lead per OSHA), PPE, and signage
ECMP Planning and Staffing	600	Day	\$400	\$240,000	Assumes full-time HAZWOPER professional during grading and earthwork
Record Keeping/Manifests	1	Job	\$20,000	\$20,000	Waste hauling, dust control, HASP records, manifests
50,000 CY Dig & Haul	50,000	CY	\$35	\$1,750,000	This cost is in addition to the cost that would be required (\$30/ton) for off-site disposal of "clean" soil.
Hazardous Soil Location	2	Weeks	\$20,000	\$40,000	Field testing and direct push
Hazardous Soil Treatment	5,000	CY	\$60	\$300,000	Portland blending on site
Dust Control	600	Days	\$100	\$60,000	Covers, barriers, water spray

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Cost Item	Quantity	Unit	Unit Cost	Subtotal	Explanation
Air Monitoring	600	Days	\$200	\$120,000	Lead particulate sampling equipment and laboratory costs only
UEC Maintenance	5	Year	\$10,000	\$50,000	Inspections of Type 5 covers and subgrade repairs and landscape
Groundwater Compliance Monitoring	2	Year	\$15,000	\$30,000	5 wells, 8260 Only, annual
Post-Occupancy Soil Care	5	Year	\$5,000	\$25,000	Repairs to landscaping, utilities, and storm water system
Incremental CAP Implementation Cost				\$2,762,000	

Key assumptions used to arrive at these costs included the following:

- Base cost of clean waste soil transport and disposal is \$30 per ton, with the additional cost of \$35 per CY for environmental-related costs.
- Grading and earthwork is estimated to require 600 days over the duration of Phases 1, 2, and 3.
- ECMP monitoring is only required during soil-disturbing activities for all phases of redevelopment.
- UEC maintenance cost is for annual reporting of Type 5 covers.
- UEC soil care comprises unusual costs for soil handling during routine repairs under paving.

TABLES

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

		Depth	T-1 E (UST) 15-18' 6/15/1999	T-1 W (UST) 15-16' 6/15/1999	T-2 N (UST) 16' 6/15/1999	T-2 S (UST) 16' 6/15/1999	T-3 N (UST) 16' 6/15/1999	T-3 S (UST) 16' 6/15/1999	T-4 N (UST) 15' 6/15/1999	T-4 S (UST) 15' 6/15/1999
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹								
Acetone	400	--		NA	NA	NA	NA	NA	NA	NA
Benzene	0.5	0.055		<0.25	<0.25	0.008	<0.005	<0.005	<0.005	<0.005
Toluene	100	--		<0.25	<0.25	0.068	<0.005	<0.005	<0.005	<0.005
Ethylbenzene	70	--		0.57	0.4	0.011	0.029	<0.005	<0.005	2.06
m,p-Xylenes	1,000	--		<0.25	<0.25	0.041	0.025	<0.005	<0.005	0.47
o-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA
Cyclohexane	20	--		NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	10	4.21		NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	21.9	--		NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg										
Arsenic	20	6.08		NA	NA	NA	NA	NA	NA	NA
Barium	1,000	2,578		NA	NA	NA	NA	NA	NA	NA
Cadmium	2	11.8		NA	NA	NA	NA	NA	NA	NA
Chromium	100	117,321		NA	NA	NA	NA	NA	NA	NA
Lead	75	418		NA	NA	NA	NA	NA	NA	NA
Mercury	0.5	4.90		NA	NA	NA	NA	NA	NA	NA
Silver	2	17		NA	NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

		Depth Date	T-5 N (UST) 15' 6/15/1999	T-5 S (UST) 15' 6/15/1999	T-6 N (UST) 15' 6/15/1999	T-6 S (UST) 15' 6/15/1999	DISP (UST) 3-3.5' 6/15/1999	TF-1 (UST) Backfill 6/15/1999	TF-2(E) (UST) Backfill 6/15/1999
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹							
Acetone	400	--		NA	NA	NA	NA	NA	NA
Benzene	0.5	0.055		<0.005	<0.005	<0.005	<0.005	<0.13	<0.005
Toluene	100	--		0.015	<0.005	<0.005	<0.005	0.27	0.013
Ethylbenzene	70	--		<0.005	<0.005	<0.005	<0.005	1.44	<0.005
m,p-Xylenes	1,000	--		0.045	<0.005	<0.005	<0.005	0.37	<0.005
o-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA
Cyclohexane	20	--		NA	NA	NA	NA	NA	NA
Chlorobenzene	10	4.21		NA	NA	NA	NA	NA	NA
Isopropylbenzene	21.9	--		NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	NA	NA	NA
Metals, mg/kg									
Arsenic	20	6.08		NA	NA	NA	NA	NA	NA
Barium	1,000	2,578		NA	NA	NA	NA	NA	NA
Cadmium	2	11.8		NA	NA	NA	NA	NA	NA
Chromium	100	117,321		NA	NA	NA	NA	NA	NA
Lead	75	418		NA	NA	NA	NA	NA	NA
Mercury	0.5	4.90		NA	NA	NA	NA	NA	NA
Silver	2	17		NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth Date	SP-1		T-2A	T-3	T-9		T-23		15'	15.5-17'		
		4' 9/28/1999	7-8' 9/28/1999	2-3' 11/9/1999	3.2-3.6' 7/21/1999	4' 7/21/1999	9'	3-3.8'	6.5-7'	10.5-11'	13.5-14'		
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹										
Acetone		400	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene		0.5	0.055		NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene		100	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene		70	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes		1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes		1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane		20	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene		10	4.21		NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene		21.9	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene		60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene		60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene		7.5	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg													
Arsenic		20	6.08		NA	NA	NA	12.5	16.8	18.1	NA	NA	NA
Barium		1,000	2,578		NA	NA	NA	1,050	29.2	341	NA	NA	NA
Cadmium		2	11.8		NA	NA	NA	<5	<5	9.07	NA	NA	NA
Chromium		100	117,321		NA	NA	NA	29.7	39.3	21.8	NA	NA	NA
Lead		75	418		1,238	5.43	360	245	4,730	1,920	1,250	355	5,610
Mercury		0.5	4.90		NA	NA	NA	0.59	<0.5	<0.5	NA	NA	NA
Silver		2	17		NA	NA	NA	<10	<10	<10	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth Date	T-24 10/7/1999								
		2-3'	9-9.5'	11.5-12'	14'	15-15.5'	17'	19'	20'	23'
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹								
Acetone	400	--	NA	NA	NA	NA	NA	NA	NA	NA
Benzene	0.5	0.055	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	100	--	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	70	--	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes	1,000	--	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes	1,000	--	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane	20	--	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	10	4.21	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	21.9	--	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	60	--	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	60	--	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	7.5	--	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg										
Arsenic	20	6.08	NA	NA	NA	NA	NA	NA	NA	NA
Barium	1,000	2,578	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	2	11.8	NA	NA	NA	NA	NA	NA	NA	NA
Chromium	100	117,321	NA	NA	NA	NA	NA	NA	NA	NA
Lead	75	418	116	329	165	201	15.7	17.6	471	107
Mercury	0.5	4.90	NA	NA	NA	NA	NA	NA	NA	NA
Silver	2	17	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth	T-25			T-26				T-27			
		1-1.5 11/9/1999	6' 10/7/1999	8-8.5' 10/7/1999	3.5-4' 10/7/1999	8.5-9' 10/7/1999	12.5-13' 10/7/1999	14-14.5' 10/7/1999	3-3.5' 10/7/1999	5.5-6' 10/7/1999	8.5-9' 10/7/1999	11'
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹									
Acetone		400	--		NA	NA	NA	NA	NA	NA	NA	NA
Benzene		0.5	0.055		NA	NA	NA	NA	NA	NA	NA	NA
Toluene		100	--		NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene		70	--		NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes		1,000	--		NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes		1,000	--		NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane		20	--		NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene		10	4.21		NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene		21.9	--		NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene		60	--		NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene		60	--		NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene		7.5	--		NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg												
Arsenic		20	6.08		NA	NA	NA	NA	NA	NA	NA	NA
Barium		1,000	2,578		NA	NA	NA	NA	NA	NA	NA	NA
Cadmium		2	11.8		NA	NA	NA	NA	NA	NA	NA	NA
Chromium		100	117,321		NA	NA	NA	NA	NA	NA	NA	NA
Lead		75	418		536	1,070	53.2	380	405	716	23.5	4,640
Mercury		0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA
Silver		2	17		NA	NA	NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth Date	T-28		T-29				T-30					
		1.5-2' 10/7/1999	4.5'	2-3'	4-5'	6.5-7' 10/7/1999	9.5-10'	11.5-12'	3-4'	4-5'	5.5-6' 10/7/1999	6.5-7'	7-7.5'
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹											
Acetone	400	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene	0.5	0.055		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	100	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	70	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane	20	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	10	4.21		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	21.9	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg													
Arsenic	20	6.08		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Barium	1,000	2,578		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	2	11.8		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium	100	117,321		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	75	418		5,980	259	6,890	146	429	778	523	305	806	7,380
Mercury	0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	2	17		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth Date	T-31			T-32			T-21A	T-33	T-34	T-35				
		11'	12-12.5'	18'	10/7/1999	11'	12-12.5'	18'	10/7/1999	2-3'	11/9/1999	1-2'	11/9/1999	1-2-1.2'	2.5-3.5
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹													
Acetone	400	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene	0.5	0.055		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	100	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	70	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane	20	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	10	4.21		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	21.9	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg															
Arsenic	20	6.08		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Barium	1,000	2,578		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	2	11.8		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium	100	117,321		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	75	418		1,330	336	314	1,170	905	592	265	968	152	1,500	338	
Mercury	0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	2	17		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

		Depth	T-36 2-2.5' 11/9/1999	T-37 2.5-3' 11/9/1999		T-38 5-6.5' 11/9/1999		T-38N 8.5-9' 11/9/1999			T-39 10-10.5' 11/9/1999	T-40 14' 11/9/1999	T-41 16' 11/9/1999	
		Date		2.5-3'	3.5-4.5'	5-6.5'	8.5-9'	10-10.5'	14'	16'	4-5'	3.5-5'	2.2'	5-6'
Volatile Organic Compounds, mg/kg			Type 1 RRS ¹	Type 2 RRS ¹										
Acetone			400	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene			0.5	0.055		NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene			100	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene			70	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes			1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes			1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane			20	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene			10	4.21		NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene			21.9	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene			60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene			60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene			7.5	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg														
Arsenic			20	6.08		NA	NA	NA	NA	NA	NA	NA	NA	NA
Barium			1,000	2,578		NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium			2	11.8		NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium			100	117,321		NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead			75	418		681	1,300	972	600	464	403	534	418	462
Mercury			0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver			2	17		NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth Date	T-42		T-43		T-44		T-45		T-46		EPD-1 1-2' 5/24/2000	EPD-2 1-2' 5/24/2000	
		1.6-2' 11/9/1999	3.5-5' 11/9/1999	5-5.5' 11/9/1999		1-1.3' 11/9/1999	2-3' 11/9/1999	4'		1-1.3' 11/9/1999	1.7-2.1' 11/9/1999	2.3-3.5' 11/9/1999		
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹												
Acetone	400	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene	0.5	0.055		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	100	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	70	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane	20	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	10	4.21		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	21.9	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg														
Arsenic	20	6.08		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Barium	1,000	2,578		NA	NA	NA	NA	NA	NA	NA	NA	NA	170	900
Cadmium	2	11.8		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium	100	117,321		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	75	418		33.9	437	110	887	1,200	86.9	34.6	2,460	333	400	1,300
Mercury	0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	2	17		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

		Depth	SB-1	SB-2	SB-3	SB-4	SB-5	SB-6	SB-7	SB-8	SB-9	SB-10
		Date	1-2' 4/17/2002	1-2' 4/17/2002	1-2' 4/17/2002	1-2' 4/17/2002	1-2' 4/18/2002 2-3'	1-2' 4/18/2002	4-4.5' 4/18/2002	4-6' 4-6' (Dup) 4/18/2002	4-6' 4/18/2002	6-8' 4/18/2002
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹									
Acetone	400	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene	0.5	0.055		NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	100	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	70	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane	20	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	10	4.21		NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	21.9	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg												
Arsenic	20	6.08		NA	NA	NA	NA	NA	NA	NA	NA	NA
Barium	1,000	2,578		98.8	66.9	114	36.7	66	88	95.9	71.1	48.3
Cadmium	2	11.8		NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium	100	117,321		NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	75	418		31	14	30	18	36	22	22	23	19
Mercury	0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	2	17		NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth Date	SB-11		SB-12				SB-13			SB-14	SB-15	SB-16
		18-20' 4/17/2002	20-22'	12-14' 4/17/2002	12-14' (Dup)	20-22'	20-22' (Dup)	2-4' 4/16/2002	18-20'	32-34'	16-20' 4/16/2002	16-20' 4/18/2002	16-20' 4/18/2002
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹										
Acetone		400	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene		0.5	0.055	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene		100	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene		70	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes		1,000	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes		1,000	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane		20	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene		10	4.21	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene		21.9	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene		60	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene		60	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene		7.5	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg													
Arsenic		20	6.08	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Barium		1,000	2,578	112	97.1	112	112	45	55.1	27.6	152	22.7	445
Cadmium		2	11.8	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium		100	117,321	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead		75	418	110	41	81	82	49	66	9,310	360	18	11,000
Mercury		0.5	4.90	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver		2	17	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth Date	MW-1		MW-2		MW-3	MW-10	GP-3		GP-4		GP-5	GP-6		
		5-6'	10-11'	4-5'	14-15'	9-10'	9-10'	7/26/2006	3-4'	7-8'	4-5'	8-9'	3/9/2006	13-14'	6-7'
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹												
Acetone		400	--		<0.084	<0.089	<0.074	<0.089	<0.075	<0.110	NA	NA	NA	NA	NA
Benzene		0.5	0.055		<0.0042	<0.0044	<0.0037	<0.0044	<0.0037	<0.0054	NA	NA	NA	NA	NA
Toluene		100	--		<0.0042	<0.0044	<0.0037	<0.0044	<0.0037	<0.0054	NA	NA	NA	NA	NA
Ethylbenzene		70	--		<0.0042	<0.0044	<0.0037	<0.0044	<0.0037	<0.0054	NA	NA	NA	NA	NA
m,p-Xylenes		1,000	--		<0.0084	<0.0089	<0.0074	<0.0089	<0.0075	<0.011	NA	NA	NA	NA	NA
o-Xylenes		1,000	--		<0.0042	<0.0044	<0.0037	<0.0044	<0.0037	<0.0054	NA	NA	NA	NA	NA
Cyclohexane		20	--		<0.0042	<0.0044	<0.0037	<0.0044	<0.0037	<0.0054	NA	NA	NA	NA	NA
Chlorobenzene		10	4.21		<0.0042	<0.0044	<0.0037	<0.0044	<0.0037	<0.0054	NA	NA	NA	NA	NA
Isopropylbenzene		21.9	--		<0.0042	<0.0044	<0.0037	<0.0044	<0.0037	<0.0054	NA	NA	NA	NA	NA
1,2-Dichlorobenzene		60	--		<0.0042	<0.0044	<0.0037	<0.0044	<0.0037	<0.0054	NA	NA	NA	NA	NA
1,3-Dichlorobenzene		60	--		<0.0042	<0.0044	<0.0037	<0.0044	<0.0037	<0.0054	NA	NA	NA	NA	NA
1,4-Dichlorobenzene		7.5	--		<0.0042	<0.0044	<0.0037	<0.0044	<0.0037	<0.0054	NA	NA	NA	NA	NA
Metals, mg/kg															
Arsenic		20	6.08		NA	NA	NA	NA	NA	<4.52	<4.07	<4.28	<4.09	<4.18	<3.6
Barium		1,000	2,578		NA	NA	NA	NA	NA	83.5	96.9	65	100	70.3	91.9
Cadmium		2	11.8		NA	NA	NA	NA	NA	<2.26	<2.03	<2.14	<2.04	<2.09	<1.80
Chromium		100	117,321		NA	NA	NA	NA	NA	38.5	9.77	11.5	7.38	25.3	13.4
Lead		75	418		NA	NA	NA	NA	NA	12.9	10.5	11.4	14.7	11.9	12.3
Mercury		0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver		2	17		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

		Depth	GP-7 2-3' 3/9/2006	GP-8 3-4' 3/9/2006		GP-9 2-3' 3/9/2006	GP-11 9-10' 5/23/2006	GP-12 9-10' 5/23/2006	GP-13 9-10' 5/23/2006	GP-14 9-10' 5/23/2006	GP-15 9-20' 5/23/2006	GP-16 9-10' 5/23/2006	GP-22 9-10' 5/23/2006
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹											
Acetone	400	--		NA	NA	NA	<0.087	<0.100	<0.100	<0.093	<0.110	<0.110	<0.100
Benzene	0.5	0.055		NA	NA	NA	<0.0044	<0.0051	<0.0051	<0.0047	<0.0053	<0.0054	<0.0052
Toluene	100	--		NA	NA	NA	<0.0044	<0.0051	<0.0051	<0.0047	<0.0053	<0.0054	<0.0052
Ethylbenzene	70	--		NA	NA	NA	<0.0044	<0.0051	<0.0051	<0.0047	<0.0053	<0.0054	<0.0052
m,p-Xylenes	1,000	--		NA	NA	NA	<0.0087	<0.010	<0.010	<0.0093	<0.011	<0.011	<0.010
o-Xylenes	1,000	--		NA	NA	NA	<0.0044	<0.0051	<0.0051	<0.0047	<0.0053	<0.0054	<0.0052
Cyclohexane	20	--		NA	NA	NA	<0.0044	<0.0051	<0.0051	<0.0047	<0.0053	<0.0054	<0.0052
Chlorobenzene	10	4.21		NA	NA	NA	<0.0044	<0.0051	<0.0051	<0.0047	<0.0053	<0.0054	<0.0052
Isopropylbenzene	21.9	--		NA	NA	NA	<0.0044	<0.0051	<0.0051	<0.0047	<0.0053	<0.0054	<0.0052
1,2-Dichlorobenzene	60	--		NA	NA	NA	<0.0044	<0.0051	<0.0051	<0.0047	<0.0053	<0.0054	<0.0052
1,3-Dichlorobenzene	60	--		NA	NA	NA	<0.0044	<0.0051	<0.0051	<0.0047	<0.0053	<0.0054	<0.0052
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	<0.0044	<0.0051	<0.0051	<0.0047	<0.0053	<0.0054	<0.0052
Metals, mg/kg													
Arsenic	20	6.08		<4.75	<3.98	<4.04	<2.98	NA	NA	NA	NA	NA	NA
Barium	1,000	2,578		129	65.4	80.3	125	NA	NA	NA	NA	NA	NA
Cadmium	2	11.8		<2.38	<1.99	<2.02	<1.49	NA	NA	NA	NA	NA	NA
Chromium	100	117,321		30.4	15.4	24.1	12.1	NA	NA	NA	NA	NA	NA
Lead	75	418		11.5	11.7	11.7	9.38	NA	NA	NA	NA	NA	NA
Mercury	0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	2	17		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

		Depth	GP-25 9-10' 5/23/2006	GP-26 7-8' 7/25/2006	GP-27 3-4' 7/25/2006	GP-28 7-8' 7/25/2006	STB-8 4-8' 8/4/2010	STB-8 20-23'	STB-9 0-4' 8/4/2010	STB-9 8-12' 8/4/2010	STB-9 16-20'	STB-10 0-4' 8/4/2010	STB-10 20-24' 8/4/2010	STB-10 28-31.5'	
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹												
Acetone	400	--		<0.100	<0.096	<0.093	<0.094	<0.076	<0.078	<0.069	<0.087	<0.079	<0.082	<0.41	<0.085
Benzene	0.5	0.055		<0.0050	<0.0048	<0.0047	<0.0047	<0.0038	<0.0039	<0.0035	<0.0043	<0.0039	<0.0041	<0.021	<0.0042
Toluene	100	--		<0.0050	<0.0048	<0.0047	<0.0047	<0.0038	<0.0039	<0.0035	<0.0043	<0.0039	<0.0041	<0.021	<0.0042
Ethylbenzene	70	--		<0.0050	<0.0048	<0.0047	<0.0047	<0.0038	<0.0039	<0.0035	<0.0043	<0.0039	<0.0041	<0.021	<0.0042
m,p-Xylenes	1,000	--		<0.010	<0.0096	<0.0093	<0.0094	<0.0076	<0.0078	<0.0069	<0.0087	<0.0079	<0.0082	<0.041	<0.0085
o-Xylenes	1,000	--		<0.0050	<0.0048	<0.0047	<0.0047	<0.0038	<0.0039	<0.0035	<0.0043	<0.0039	<0.0041	<0.021	<0.0042
Cyclohexane	20	--		<0.0050	<0.0048	<0.0047	<0.0047	<0.0038	<0.0039	<0.0035	<0.0043	<0.0039	<0.0041	<0.021	<0.0042
Chlorobenzene	10	4.21		<0.0050	<0.0048	<0.0047	<0.0047	<0.0038	<0.0039	<0.0035	<0.0043	<0.0039	<0.0041	<0.021	<0.0042
Isopropylbenzene	21.9	--		<0.0050	<0.0048	<0.0047	<0.0047	<0.0038	<0.0039	<0.0035	<0.0043	<0.0039	<0.0041	<0.021	<0.0042
1,2-Dichlorobenzene	60	--		<0.0050	<0.0048	<0.0047	<0.0047	<0.0038	<0.0039	<0.0035	<0.0043	<0.0039	<0.0041	<0.021	<0.0042
1,3-Dichlorobenzene	60	--		<0.0050	<0.0048	<0.0047	<0.0047	<0.0038	<0.0039	<0.0035	<0.0043	<0.0039	<0.0041	<0.021	<0.0042
1,4-Dichlorobenzene	7.5	--		<0.0050	<0.0048	<0.0047	<0.0047	<0.0038	<0.0039	<0.0035	<0.0043	<0.0039	<0.0041	<0.021	<0.0042
Metals, mg/kg															
Arsenic	20	6.08		NA	NA	NA	NA	<5.48	<5.15	<5.7	<5.71	<5.37	<5.37	<8.65	<6.49
Barium	1,000	2,578		NA	NA	NA	NA	68	111	156	160	102	133	10.3	104
Cadmium	2	11.8		NA	NA	NA	NA	<2.74	<2.57	<2.85	<2.85	<2.69	9.91	<4.33	<3.25
Chromium	100	117,321		NA	NA	NA	NA	8.41	6.73	30.8	32	21.3	29.1	<4.33	12.5
Lead	75	418		NA	NA	NA	NA	16.3	7.48	65.8	22.7	10.1	280	18	7.09
Mercury	0.5	4.90		NA	NA	NA	NA	<0.114	<0.112	<0.117	<0.118	<0.112	0.223	<0.172	<0.129
Silver	2	17		NA	NA	NA	NA	<2.74	<2.57	<2.85	<2.85	<2.69	<2.69	<4.33	<3.25

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth	Date	MW-3R		MW-32		MW-31		STB-11	
			2'	12' 8/30/2010	6'	12' 8/30/2010	6'	14' 9/1/2010	4-8'	28-31' 9/30/2010
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹								
Acetone	400	--		<0.073	<0.082	<0.084	<0.090	<0.076	<0.082	<0.081 <0.078
Benzene	0.5	0.055		<0.0036	<0.0041	<0.0042	<0.0045	<0.0038	<0.0041	<0.0040 <0.0039
Toluene	100	--		<0.0036	<0.0041	<0.0042	<0.0045	<0.0038	<0.0041	<0.0040 <0.0039
Ethylbenzene	70	--		<0.0036	<0.0041	<0.0042	<0.0045	<0.0038	<0.0041	<0.0040 <0.0039
m,p-Xylenes	1,000	--		<0.0073	<0.0082	<0.0084	<0.0090	<0.0076	<0.0082	<0.0081 <0.0078
o-Xylenes	1,000	--		<0.0036	<0.0041	<0.0042	<0.0045	<0.0038	<0.0041	<0.0040 <0.0039
Cyclohexane	20	--		<0.0036	<0.0041	<0.0042	<0.0045	<0.0038	<0.0041	<0.0040 <0.0039
Chlorobenzene	10	4.21		<0.0036	<0.0041	<0.0042	<0.0045	<0.0038	<0.0041	<0.0040 <0.0039
Isopropylbenzene	21.9	--		<0.0036	<0.0041	<0.0042	<0.0045	<0.0038	<0.0041	<0.0040 <0.0039
1,2-Dichlorobenzene	60	--		<0.0036	<0.0041	<0.0042	<0.0045	<0.0038	<0.0041	<0.0040 <0.0039
1,3-Dichlorobenzene	60	--		<0.0036	<0.0041	<0.0042	<0.0045	<0.0038	<0.0041	<0.0040 <0.0039
1,4-Dichlorobenzene	7.5	--		<0.0036	<0.0041	<0.0042	<0.0045	<0.0038	<0.0041	<0.0040 <0.0039
Metals, mg/kg										
Arsenic	20	6.08		<5.3	<5.75	<5.71	<4.39	<5.47	<5.66	30.1 <5.95
Barium	1,000	2,578		99.6	115	108	118	77.6	107	300 126
Cadmium	2	11.8		<2.65	<2.87	<2.86	<2.20	<2.73	<2.83	<3.14 <2.98
Chromium	100	117,321		28.9	17.7	20.9	12.3	40.5	25.6	41.5 15.1
Lead	75	418		52	20.5	11	7.17	10.8	8.03	6,460 6.46
Mercury	0.5	4.90		<0.125	<0.116	<0.116	<0.111	<0.113	<0.119	0.454 <0.123
Silver	2	17		<2.65	<2.87	<2.86	<2.20	<2.73	<2.83	21.3 <2.98

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 1. Summary of Constituents of Concern in Soil Samples at the 1115 Howell Mill Road Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth Date	URB-1						URB-2							
		6-12"	18-24"	3.5' 9/19/2013	6'	8'	19'	6-12"	18-24"	4' 9/19/2013	8'	15'			
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹												
Acetone		400	--		NA	NA	<0.14	NA	<0.12	<0.15	<0.10	NA	<0.11	<0.20	<0.14
Benzene		0.5	0.055		NA	NA	<0.0072	NA	<0.0058	<0.0075	<0.0051	NA	<0.0053	<0.0099	<0.0070
Toluene		100	--		NA	NA	<0.0072	NA	<0.0058	<0.0075	<0.0051	NA	<0.0053	<0.0099	<0.0070
Ethylbenzene		70	--		NA	NA	<0.0072	NA	<0.0058	<0.0075	<0.0051	NA	<0.0053	<0.0099	<0.0070
m,p-Xylenes		1,000	--		NA	NA	<0.014	NA	<0.012	<0.015	<0.010	NA	<0.011	<0.020	<0.014
o-Xylenes		1,000	--		NA	NA	<0.0072	NA	<0.0058	<0.0075	<0.0051	NA	<0.0053	<0.0099	<0.0070
Cyclohexane		20	--		NA	NA	<0.0072	NA	<0.0058	<0.0075	<0.0051	NA	<0.0053	<0.0099	<0.0070
Chlorobenzene		10	4.21		NA	NA	<0.014	NA	<0.012	<0.015	<0.010	NA	<0.011	<0.020	<0.014
Isopropylbenzene		21.9	--		NA	NA	<0.0072	NA	<0.0058	<0.0075	<0.0051	NA	<0.0053	<0.0099	<0.0070
1,2-Dichlorobenzene		60	--		NA	NA	<0.0072	NA	<0.0058	<0.0075	<0.0051	NA	<0.0053	<0.0099	<0.0070
1,3-Dichlorobenzene		60	--		NA	NA	<0.0072	NA	<0.0058	<0.0075	<0.0051	NA	<0.0053	<0.0099	<0.0070
1,4-Dichlorobenzene		7.5	--		NA	NA	<0.0072	NA	<0.0058	<0.0075	<0.0051	NA	<0.0053	<0.0099	<0.0070
Metals, mg/kg															
Arsenic		20	6.08		<5.52	<6.02	<6.06	<6.31	<5.71	NA	<5.12	<5.85	<6.03	NA	NA
Barium		1,000	2,578		157	143	69.3	194	76.4	NA	131	110	117	NA	NA
Cadmium		2	11.8		1.56	1.32	0.97	2.22	1.63	NA	1.37	1.79	1.68	NA	NA
Chromium		100	117,321		34.6	14.4	8.45	43.2	28.2	NA	7.45	23.5	15.3	NA	NA
Lead		75	418		42.5	19.4	9.35	23.1	16.6	NA	40.5	21.8	20.3	NA	NA
Mercury		0.5	4.90		0.144	<0.0573	<0.0600	0.0759	<0.0551	NA	<0.0553	<0.0569	<0.0559	NA	NA
Silver		2	17		<5.52	<6.02	<6.06	<6.31	<5.71	NA	<5.12	<5.85	<6.03	NA	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in VRP Application.

NA- Not Analyzed

Bold- Exceeds both Type 1 and Type 2 RRSs

Bold- Analyte Detected

Table 2. Summary of Constituents of Concern in Soil Samples at the 673 Ethel Street Parcel

Welcome Years, Inc. HSI No. 10637

Atlanta, Fulton County, Georgia

	Depth Date	T-2-E4		T-4		T-6			T-7			T-8		
		4' 7/24/2002	11' 7/24/2002	5' 7/24/2002	6.5' 7/24/2002	5' 7/24/2002	7' 7/24/2002	11-12' 7/24/2002	6-8' 7/24/2002	8-12' 7/24/2002	12-14' 7/24/2002	4.5' 7/24/2002	6.5' 7/24/2002	14' 7/24/2002
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹											
Acetone		400	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene		0.5	0.055			NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene		100	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene		70	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes		1,000	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes		1,000	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane		20	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene		10	4.21			NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene		21.9	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene		100	NC			NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene		60	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene		60	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene		7.5	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg														
Arsenic		20	6.08		12.8	NA	NA	NA	NA	NA	NA	NA	<20	NA
Barium		1,000	2,578		577	NA	NA	NA	NA	NA	NA	NA	348	NA
Cadmium		2	11.8		5.38	NA	NA	NA	NA	NA	NA	NA	<10	NA
Chromium		100	117,321		62.6	NA	NA	NA	NA	NA	NA	NA	40.7	NA
Lead		75	418		945	11.1	251	8.95	37.7	396	9.89	28.6	188	14.8
Mercury		0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver		2	17		<10	NA	NA	NA	NA	NA	NA	NA	<40	NA

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in Attachment C of the VRP

Application dated November 2011.

*Volatile Organic Compound samples analyzed outside of recommended hold time

NC- Not Calculated

NA- Not Analyzed

Bold-Analyte detected**Bold**- Exceeds both the Type 1 and Type 2 RRSs

Table 2. Summary of Constituents of Concern in Soil Samples at the 673 Ethel Street Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Type 1 RRS ¹	Type 2 RRS ¹	Depth Date	T-12		T-14		T-16	T-17		T-19			
				2-3'	4-5'	7/24/2002	4.5'	9'	7/25/2002	1-3'	7-8'	7/25/2002	9'	12'
Volatile Organic Compounds, mg/kg														
Acetone	400	--		NA	NA		NA	NA		NA	NA		NA	NA
Benzene	0.5	0.055		NA	NA		NA	NA		NA	NA		NA	NA
Toluene	100	--		NA	NA		NA	NA		NA	NA		NA	NA
Ethylbenzene	70	--		NA	NA		NA	NA		NA	NA		NA	NA
m,p-Xylenes	1,000	--		NA	NA		NA	NA		NA	NA		NA	NA
o-Xylenes	1,000	--		NA	NA		NA	NA		NA	NA		NA	NA
Cyclohexane	20	--		NA	NA		NA	NA		NA	NA		NA	NA
Chlorobenzene	10	4.21		NA	NA		NA	NA		NA	NA		NA	NA
Isopropylbenzene	21.9	--		NA	NA		NA	NA		NA	NA		NA	NA
Naphthalene	100	NC		NA	NA		NA	NA		NA	NA		NA	NA
1,2-Dichlorobenzene	60	--		NA	NA		NA	NA		NA	NA		NA	NA
1,3-Dichlorobenzene	60	--		NA	NA		NA	NA		NA	NA		NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA		NA	NA		NA	NA		NA	NA
Metals, mg/kg														
Arsenic	20	6.08		NA	NA		<5	<20		NA	NA	<5	NA	NA
Barium	1,000	2,578		NA	NA		251	304		NA	NA	173	NA	NA
Cadmium	2	11.8		NA	<2		<2.5	122		<2	17.3	<2	<2	NA
Chromium	100	117,321		NA	21.3		15.8	300		<5	63.1	11.6	35.8	NA
Lead	75	418		790	17.4		646	5,780		22.3	843	22	550	261
Mercury	0.5	4.90		NA	NA		NA	NA		NA	NA	NA	NA	NA
Silver	2	17		NA	NA		<10	<40		NA	NA	<2	NA	NA

Notes:

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Application dated November 2011.

* Volatile Organic Compound samples analyzed outside of recommended hold time

NC- Not Calculated

NA- Not Analyzed

Bold-Analyte detected

Bold- Exceeds both the Type 1 and Type 2 RRSs

Table 2. Summary of Constituents of Concern in Soil Samples at the 673 Ethel Street Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth	Date	T-20	T-22	T-23		T-24					T-25
			2-4' 7/25/2002	18-18.5' 7/25/2002	5' 7/25/2002	13'	6'	10'	13' 7/24/2002	17.5'	19'	15' 7/24/2002
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹										
Acetone	400	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene	0.5	0.055		NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	100	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	70	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane	20	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	10	4.21		NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	21.9	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	100	NC		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg												
Arsenic	20	6.08		NA	NA	NA	NA	NA	NA	<5	NA	
Barium	1,000	2,578		NA	NA	NA	NA	NA	NA	97.6	NA	
Cadmium	2	11.8		4.88	NA	NA	4.3	NA	NA	NA	<2	NA
Chromium	100	117,321		12.9	NA	NA	31	NA	NA	NA	11.7	NA
Lead	75	418		263	12.2	8.2	360	11	245	65.1	101	9.92
Mercury	0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	2	17		NA	NA	NA	NA	NA	NA	NA	<10	NA

Notes:

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Application dated November 2011.

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NA- Not Analyzed

Bold-Analyte detected

Bold- Exceeds both the Type 1 and Type 2 RRSs

Table 2. Summary of Constituents of Concern in Soil Samples at the 673 Ethel Street Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth Date	MW-17 (f.k.a. MW-1)			MW-16 (f.k.a. MW-3)		GP-1		GP-2		GP-3				
		12.5-13'	15-16'	18-19'	7-8'	11-12'	12/2/2002	2-3'	3-4'	12/2/2002	6.5-7'	9-9.5'	12/2/2002	1-2'	2-2.5'
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹												
Acetone		400	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene		0.5	0.055		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene		100	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene		70	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes		1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes		1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane		20	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene		10	4.21		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene		21.9	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene		100	NC		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene		60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene		60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene		7.5	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg															
Arsenic		20	6.08		NA	NA	<5	9.75	<5	NA	<5	NA	NA	NA	<5
Barium		1,000	2,578		NA	NA	38.8	455	50.2	NA	177	NA	NA	NA	192
Cadmium		2	11.8		<2	NA	<2	3.35	<2	NA	<2	NA	NA	NA	<2
Chromium		100	117,321		26.3	NA	12.1	30.9	15.8	NA	16.2	NA	NA	NA	23.2
Lead		75	418		217	150	12.1	1,290	15	55.5	19.7	15.2	30.2	59.1	13.4
Mercury		0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver		2	17		NA	NA	<2	<2	<2	NA	<2	NA	NA	NA	<2

Notes:

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Application dated November 2011.

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Bold-Analyte detected

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Table 2. Summary of Constituents of Concern in Soil Samples at the 673 Ethel Street Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth Date	GP-5 6.5-7.5' 11-12' 15-16' 17-18' 12/3/2002				GP-6 5-6' 12/3/2002	GP-7 18-20' 18-20' (Dup) 22-23' 12/3/2002			GP-10 9-12' 15-16' 21-23' 24-25' 12/4/2002				GP-11 2-4' 12/4/2002
		Type 1 RRS ¹	Type 2 RRS ¹											
Volatile Organic Compounds, mg/kg														
Acetone		400	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene		0.5	0.055			NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene		100	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene		70	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes		1,000	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes		1,000	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane		20	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene		10	4.21			NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene		21.9	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene		100	NC			NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene		60	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene		60	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene		7.5	--			NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg														
Arsenic		20	6.08			NA	NA	NA	NA	NA	12.3	NA	<5	<5
Barium		1,000	2,578			NA	NA	NA	NA	NA	109	NA	34	209
Cadmium		2	11.8			NA	NA	2.46	NA	NA	3.63	NA	<2	NA
Chromium		100	117,321			NA	NA	17.1	NA	NA	53.3	NA	11.7	29.5
Lead		75	418			16.2	19.5	321	13.4	18.4	59,900	7,100	23.1	15.4
Mercury		0.5	4.90			NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver		2	17			NA	NA	NA	NA	NA	<2	NA	<2	NA

Notes:

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Application dated November 2011.

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Table 2. Summary of Constituents of Concern in Soil Samples at the 673 Ethel Street Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth	GP-12		GP-14		GP-16		GP-17		GP-18	
		10-11'	13-14'	5-6.5'	7-8'	2-2.5'	7-8'	4-5'		2-3'	6-7'
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹									
Acetone	400	--		NA	NA	NA	NA	NA		NA	NA
Benzene	0.5	0.055		NA	NA	NA	NA	NA		NA	NA
Toluene	100	--		NA	NA	NA	NA	NA		NA	NA
Ethylbenzene	70	--		NA	NA	NA	NA	NA		NA	NA
m,p-Xylenes	1,000	--		NA	NA	NA	NA	NA		NA	NA
o-Xylenes	1,000	--		NA	NA	NA	NA	NA		NA	NA
Cyclohexane	20	--		NA	NA	NA	NA	NA		NA	NA
Chlorobenzene	10	4.21		NA	NA	NA	NA	NA		NA	NA
Isopropylbenzene	21.9	--		NA	NA	NA	NA	NA		NA	NA
Naphthalene	100	NC		NA	NA	NA	NA	NA		NA	NA
1,2-Dichlorobenzene	60	--		NA	NA	NA	NA	NA		NA	NA
1,3-Dichlorobenzene	60	--		NA	NA	NA	NA	NA		NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	NA	NA		NA	NA
Metals, mg/kg											
Arsenic	20	6.08		NA	NA	NA	NA	NA	<4.98	<4.76	<4.97
Barium	1,000	2,578		NA	NA	NA	NA	NA	99.3	242	189
Cadmium	2	11.8		NA	NA	NA	NA	NA	<2.45	<2.38	<2.48
Chromium	100	117,321		NA	NA	NA	NA	NA	7.27	28	26.5
Lead	75	418		32.4	12.5	10.1	12.2	51.5	15.7	<4.98	<4.76
Mercury	0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA
Silver	2	17		NA	NA	NA	NA	NA	NA	NA	NA

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Table 2. Summary of Constituents of Concern in Soil Samples at the 673 Ethel Street Parcel

Welcome Years, Inc. HSI No. 10637

Atlanta, Fulton County, Georgia

		Depth Date	GP-20			GP-21		GP-22	GP-23		GP-24	GP-25	
			9-10' 3/10/2006	14-16' 3/10/2006	18-20'	3-5' 3/10/2006	7-8'	4-5' 3/10/2006	2.5-3.5' 3/13/2006	2.5-3.5 (Dup) 3/13/2006	3-4' 3/13/2006	2-3' 3/13/2006	5-6' 3/13/2006
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹											
Acetone	400	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene	0.5	0.055		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	100	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	70	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane	20	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	10	4.21		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	21.9	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	100	NC		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals, mg/kg													
Arsenic	20	6.08		<3.76	5.87	<4.7	10.7	<3.97	<4.98	<4.57	<4.01	<4.35	4.68 <4.68
Barium	1,000	2,578		106	189	66.9	214	40.7	99.3	71.2	76.3	118	188 80.4
Cadmium	2	11.8		<1.88	<2.26	<2.35	<2.1	<1.99	<2.45	<2.29	<2	<2.17	<2.07 <2.34
Chromium	100	117,321		17.5	37.3	19.4	31.9	14.9	7.27	5.86	5.2	10.9	76.7 5.56
Lead	75	418		19.5	428	11.8	792	12.7	<4.98	<4.57	<4.01	5.47	217 7.87
Mercury	0.5	4.90		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	2	17		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

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Application dated November 2011.

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Table 2. Summary of Constituents of Concern in Soil Samples at the 673 Ethel Street Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth Date	HA-1	HA-2	HA-3	HA-4	STB-1			STB-2				STB-3			
		1-1.5' 3/10/2006	3.5-4' 3/10/2006	2-2.5' 3/10/2006	2.5-3' 3/10/2006	0-4' 8/3/2010	12-16'	28-32'	0-2'	4-8'	8-12'	28-31'	0-4' 8/3/2010	16-20'		
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹													
Acetone		400	--	NA	NA	NA	<0.075	<0.13	<0.079	<0.076	<0.086	<0.083	<0.069	<0.077	<0.077	
Benzene		0.5	0.055	NA	NA	NA	<0.0038	<0.0066	<0.0039	<0.0038	0.03	<0.0042	<0.0034	<0.0039	<0.0038	
Toluene		100	--	NA	NA	NA	<0.0038	0.02	<0.0039	<0.0038	0.0046	<0.0042	<0.0034	<0.0039	<0.0038	
Ethylbenzene		70	--	NA	NA	NA	<0.0038	0.034	<0.0039	<0.0038	<0.0043	<0.0042	<0.0034	<0.0039	<0.0038	
m,p-Xylenes		1,000	--	NA	NA	NA	<0.0075	0.16	<0.0079	<0.0076	<0.0086	<0.0083	<0.0069	<0.0077	<0.0077	
o-Xylenes		1,000	--	NA	NA	NA	<0.0038	0.0051	<0.0039	<0.0038	<0.0043	<0.0042	<0.0034	<0.0039	<0.0038	
Cyclohexane		20	--	NA	NA	NA	<0.0038	0.0071	<0.0039	<0.0038	<0.0043	<0.0042	<0.0034	<0.0039	<0.0038	
Chlorobenzene		10	4.21	NA	NA	NA	<0.0038	0.015	<0.0039	<0.0038	<0.0043	<0.0042	<0.0034	<0.0039	<0.0038	
Isopropylbenzene		21.9	--	NA	NA	NA	<0.0038	0.033	<0.0039	<0.0038	<0.0043	<0.0042	<0.0034	<0.0039	<0.0038	
Naphthalene		100	NC	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
1,2-Dichlorobenzene		60	--	NA	NA	NA	<0.0038	<0.0066	<0.0039	<0.0038	<0.0043	<0.0042	<0.0034	<0.0039	<0.0038	
1,3-Dichlorobenzene		60	--	NA	NA	NA	<0.0038	<0.0066	<0.0039	<0.0038	<0.0043	<0.0042	<0.0034	<0.0039	<0.0038	
1,4-Dichlorobenzene		7.5	--	NA	NA	NA	<0.0038	0.027	<0.0039	<0.0038	<0.0043	<0.0042	<0.0034	<0.0039	<0.0038	
Metals, mg/kg																
Arsenic		20	6.08	<4.87	<3.97	<3.27	<4.50	<5.98	<8.4	<6.08	<0.536	11.9	<6.00	<5.76	<5.06	<5.49
Barium		1,000	2,578	103	53.6	46.9	18.8	107	304	104	138	345	98	122	115	108
Cadmium		2	11.8	<2.43	<1.98	<1.64	<2.25	<2.99	8.0	<3.04	<0.268	3.14	<3.00	<2.88	<2.53	<2.75
Chromium		100	117,321	76.8	22.8	6.68	2.26	31.2	146	14.3	17.3	27.3	15.3	16.7	8.22	8.11
Lead		75	418	10.4	<3.97	9.51	4.84	33	2,790	14.3	458	1,750	10.7	<5.76	41.7	14.10
Mercury		0.5	4.90	NA	NA	NA	NA	<0.122	0.494	<0.126	<0.109	<0.121	<0.119	<0.119	<0.107	<0.117
Silver		2	17	NA	NA	NA	NA	<2.99	4.69	<3.04	<2.68	<3.01	<3.00	<2.88	<2.53	<2.75

Notes:

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Table 2. Summary of Constituents of Concern in Soil Samples at the 673 Ethel Street Parcel

Welcome Years, Inc. HSI No. 10637

Atlanta, Fulton County, Georgia

	Depth Date	STB-4		STB-5			STB-6 8-10' 8/3/2010	STB-7					TVB-1*	
		0-4' 8/3/2010	12-16'	4-8' 8/3/2010	16-20'	20-23'		0-4'	8-12'	16-20'	16-20' (Dup)	28-31.5'	0-6" 9/18/2013	18-24"
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹											
Acetone	400	--		<0.076	<0.076	<0.098	<6.4	<0.065	<0.075	0.27	<0.075	<0.075	<0.12	<0.073
Benzene	0.5	0.055		<0.0039	<0.0038	<0.0049	3.2	<0.0032	<0.0037	<0.0038	<0.0037	<0.0037	0.034	<0.0036
Toluene	100	--		<0.0039	<0.0038	<0.0049	<0.32	<0.0032	<0.0037	<0.0038	<0.0037	<0.0037	<0.0060	<0.0036
Ethylbenzene	70	--		<0.0039	<0.0038	<0.0049	<0.32	<0.0032	<0.0037	<0.0038	<0.0037	<0.0037	<0.0060	<0.0036
m,p-Xylenes	1,000	--		<0.0076	<0.0076	<0.0098	<0.64	<0.0065	<0.0075	<0.0076	<0.0075	<0.0075	<0.012	<0.0073
o-Xylenes	1,000	--		<0.0039	<0.0038	<0.0049	<0.32	<0.0032	<0.0037	<0.0038	<0.0037	<0.0037	<0.0060	<0.0036
Cyclohexane	20	--		<0.0039	<0.0038	<0.0049	<0.32	<0.0032	<0.0037	<0.0038	<0.0037	<0.0037	<0.0060	<0.0036
Chlorobenzene	10	4.21		<0.0039	<0.0038	<0.0049	110	0.0049	<0.0037	<0.0038	<0.0037	<0.0037	0.79	<0.0036
Isopropylbenzene	21.9	--		<0.0039	<0.0038	<0.0049	0.53	<0.0032	<0.0037	<0.0038	<0.0037	<0.0037	0.38	<0.0036
Naphthalene	100	NC		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0308
1,2-Dichlorobenzene	60	--		<0.0039	<0.0038	<0.0049	<0.32	<0.0032	<0.0037	<0.0038	<0.0037	<0.0037	0.007	<0.0036
1,3-Dichlorobenzene	60	--		<0.0039	<0.0038	<0.0049	1.1	<0.0032	<0.0037	<0.0038	<0.0037	<0.0037	0.0096	<0.0036
1,4-Dichlorobenzene	7.5	--		<0.0039	<0.0038	<0.0049	5.8	<0.0032	<0.0037	<0.0038	<0.0037	<0.0037	0.10	<0.0036
Metals, mg/kg														
Arsenic	20	6.08		<5.42	<6.18	8.41	<6.25	<5.94	<5.28	<5.08	<5.37	<7.78	7.16	<5.92
Barium	1,000	2,578		141	89.8	277	127	110	81.4	126	417	390	385	101
Cadmium	2	11.8		<2.71	<3.09	7.28	21.3	<2.97	<2.64	<2.54	<2.68	6.56	5.64	<2.96
Chromium	100	117,321		7.48	4.59	30.3	585	7.15	10.5	12.6	19.2	76.2	203	12.2
Lead	75	418		30.3	7.16	723	2,640	<5.94	15	39.3	321	792	1,180	6.13
Mercury	0.5	4.90		<0.109	<0.128	<0.123	0.751	<0.120	<0.107	<0.107	<0.113	0.929	0.309	<0.125
Silver	2	17		<2.71	<3.09	9.17	<3.13	<2.97	<2.64	<2.54	<2.68	16.6	6.1	<2.96

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in Attachment C of the VRP

Application dated November 2011.

*Volatile Organic Compound samples analyzed outside of recommended hold time

NC- Not Calculated

NA- Not Analyzed

Bold-Analyte detected**Bold-** Exceeds both the Type 1 and Type 2 RSSs

Table 2. Summary of Constituents of Concern in Soil Samples at the 673 Ethel Street Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

	Depth	TVB-2		TVB-3*			TVB-4*			TVB-5		
		0-6"	18-21"	0-6"	18-24"	3-3.5'	1'	2'	4'	2'	4'	5-6'
Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹										
Acetone	400	--		NA	NA	NA	0.16	NA	<0.10	NA	NA	NA
Benzene	0.5	0.055		NA	NA	NA	<0.0061	NA	<0.0050	NA	NA	NA
Toluene	100	--		NA	NA	NA	0.0099	NA	0.0051	NA	NA	NA
Ethylbenzene	70	--		NA	NA	NA	<0.0061	NA	<0.0050	NA	NA	NA
m,p-Xylenes	1,000	--		NA	NA	NA	0.012	NA	<0.010	NA	NA	NA
o-Xylenes	1,000	--		NA	NA	NA	0.006	NA	<0.0050	NA	NA	NA
Cyclohexane	20	--		NA	NA	NA	<0.0061	NA	<0.0050	NA	NA	NA
Chlorobenzene	10	4.21		NA	NA	NA	<0.012	NA	<0.010	NA	NA	NA
Isopropylbenzene	21.9	--		NA	NA	NA	<0.0061	NA	<0.0050	NA	NA	NA
Naphthalene	100	NC		NA	NA	NA	0.0284	NA	0.0113	NA	NA	NA
1,2-Dichlorobenzene	60	--		NA	NA	NA	<0.0061	NA	<0.0050	NA	NA	NA
1,3-Dichlorobenzene	60	--		NA	NA	NA	<0.0061	NA	<0.0050	NA	NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	<0.0061	NA	<0.0050	NA	NA	NA
Metals, mg/kg												
Arsenic	20	6.08		6.32	<5.28	14	<5.73	<5.04	<5.73	<6.10	<5.38	<4.55
Barium	1,000	2,578		110	107	201	207	87.6	146	159	161	130
Cadmium	2	11.8		14.3	0.844	7.21	1.43	0.807	1.41	1.5	1.0	0.709
Chromium	100	117,321		38.4	11.4	63.7	18.9	10.4	26.5	26	6.23	8.56
Lead	75	418		296	18.9	1,260	55.4	<5.04	31.5	39.3	7.36	5.57
Mercury	0.5	4.90		0.258	<0.0508	1.15	<0.0601	<0.0527	<0.0584	<0.0540	<0.0559	<0.0526
Silver	2	17		<4.98	<5.28	15.7	<5.73	<5.04	<5.73	<6.10	<5.38	<4.55

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in Attachment C of the VRP

Application dated November 2011.

*Volatile Organic Compound samples analyzed outside of recommended hold time

NC- Not Calculated

NA- Not Analyzed

Bold-Analyte detected

Bold- Exceeds both the Type 1 and Type 2 RSSs

Table 2. Summary of Constituents of Concern in Soil Samples at the 673 Ethel Street Parcel
 Welcome Years, Inc. HSI No. 10637
 Atlanta, Fulton County, Georgia

Volatile Organic Compounds, mg/kg	Type 1 RRS ¹	Type 2 RRS ¹	Depth Date	TVB-6				TVB-7					TVB-8		
				0-6"	18-24"	4'	6'	1'	18-24"	6'	14'	18'	0-6"	18-24"	6'
Acetone	400	--		NA	NA	NA	NA	NA	NA	NA	<0.11	<0.11	NA	NA	NA
Benzene	0.5	0.055		NA	NA	NA	NA	NA	NA	NA	<0.0056	<0.0055	NA	NA	NA
Toluene	100	--		NA	NA	NA	NA	NA	NA	NA	<0.0056	<0.0055	NA	NA	NA
Ethylbenzene	70	--		NA	NA	NA	NA	NA	NA	NA	<0.0056	<0.0055	NA	NA	NA
m,p-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	<0.011	<0.011	NA	NA	NA
o-Xylenes	1,000	--		NA	NA	NA	NA	NA	NA	NA	<0.0056	<0.0055	NA	NA	NA
Cyclohexane	20	--		NA	NA	NA	NA	NA	NA	NA	<0.0056	<0.0055	NA	NA	NA
Chlorobenzene	10	4.21		NA	NA	NA	NA	NA	NA	NA	<0.011	<0.011	NA	NA	NA
Isopropylbenzene	21.9	--		NA	NA	NA	NA	NA	NA	NA	<0.0056	<0.0055	NA	NA	NA
Naphthalene	100	NC		NA	NA	NA	NA	NA	NA	NA	<0.00557	<0.00553	NA	NA	NA
1,2-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	<0.0056	<0.0055	NA	NA	NA
1,3-Dichlorobenzene	60	--		NA	NA	NA	NA	NA	NA	NA	<0.0056	<0.0055	NA	NA	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	NA	NA	NA	NA	NA	<0.0056	<0.0055	NA	NA	NA
Metals, mg/kg															
Arsenic	20	6.08		<5.70	<5.27	<5.29	<5.69	<5.75	<5.30	<6.27	<5.62	<5.62	7.21	24.9	<5.78
Barium	1,000	2,578		77	83.4	43.9	145	186	153	157	121	156	117	372	87.9
Cadmium	2	11.8		2.52	1.05	<0.529	0.8	2.15	0.795	1.91	0.922	0.765	1.95	7.0	0.901
Chromium	100	117,321		28.6	19.1	10.9	20.1	23.1	11.9	25.5	42.6	20.5	20.4	85.8	16.9
Lead	75	418		21	13.4	8.78	54.1	220	20.7	175	8.39	<5.62	361	1,170	30.9
Mercury	0.5	4.90		<0.0515	<0.0522	<0.0540	<0.0620	<0.0570	<0.0566	0.229	<0.0562	<0.0562	0.135	0.244	<0.0589
Silver	2	17		<5.70	<5.27	<5.29	<5.69	<5.75	<5.30	<6.27	<5.62	<5.62	<5.51	18.9	<5.78

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in Attachment C of the VRP

Application dated November 2011.

*Volatile Organic Compound samples analyzed outside of recommended hold time

NC- Not Calculated

NA- Not Analyzed

Bold-Analyte detected

Bold- Exceeds both the Type 1 and Type 2 RRSs

Table 3. Summary of Constituents of Concern in Soil Samples at the "0" and 720 14th Street Parcel.

Welcome Years, Inc. HSI No. 10637

Atlanta, Fulton County, Georgia

		Depth Date	BHV-1			BHV-2				BHV-3			
			6-12"	18-24"	4' 9/18/2013	6'	10'	12'	0-6"	18-24"	4' 9/19/2013	6'	
Volatile Organic Compounds, mg/kg		Type 1 RRS ¹	Type 2 RRS ¹										
Acetone	400	--			NA	NA	NA	NA	NA	<0.17	<0.22	<0.12	NA
Benzene	0.5	0.055			NA	NA	NA	NA	NA	<0.0087	<0.011	<0.0059	NA
Toluene	100	--			NA	NA	NA	NA	NA	<0.0087	<0.011	<0.0059	NA
Ethylbenzene	70	--			NA	NA	NA	NA	NA	<0.0087	<0.011	<0.0059	NA
m,p-xylenes	1,000	--			NA	NA	NA	NA	NA	<0.017	<0.022	<0.012	NA
o,xylenes	1,000	--			NA	NA	NA	NA	NA	<0.0087	<0.011	<0.0059	NA
Cyclohexane	20	--			NA	NA	NA	NA	NA	<0.0087	<0.011	<0.0059	NA
Chlorobenzene	10	4.21			NA	NA	NA	NA	NA	<0.017	<0.022	<0.012	NA
Isopropylbenzene	21.9	--			NA	NA	NA	NA	NA	<0.0087	<0.011	<0.0059	NA
Naphthalene	100	NC			NA	NA	NA	NA	NA	<0.00875	<0.011	<0.00591	NA
1,2-Dichlorobenzene	60	--			NA	NA	NA	NA	NA	<0.0087	<0.011	<0.0059	NA
1,3-Dichlorobenzene	60	--			NA	NA	NA	NA	NA	<0.0087	<0.011	<0.0059	NA
1,4-Dichlorobenzene	7.5	--			NA	NA	NA	NA	NA	<0.0087	<0.011	<0.0059	NA
Metals, mg/kg													
Arsenic	20	6.08			<5.06	<5.46	<5.17	<6.53	<5.98	<6.01	<5.21	NA	<5.46
Barium	1,000	2,578			205	82.6	127	222	188	219	116	NA	155
Cadmium	2	11.8			1.46	1.45	0.796	4.75	17.6	2.19	0.677	NA	1.5
Chromium	100	117,321			33.8	43.7	12.6	98.2	290	24.3	38.4	NA	27.1
Lead	75	418			48.8	58	9.3	1,350	85.1	17.4	6.5	NA	142
Mercury	0.5	4.90			<0.0546	<0.0546	<0.0485	<0.0605	<0.0587	<0.0643	<0.0568	NA	0.0655
Silver	2	17			<5.06	<5.46	<5.17	<6.53	<5.98	<6.01	<5.21	NA	<5.46

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in Attachment C of the VRP

Application dated November 2011.

*Sample analyzed outside of recommended hold time

NC- Not Calculated

NA- Not Analyzed

Bold-Analyte Detected

Bold- Exceeds both the Type 1 and Type 2 RRSs

Table 3. Summary of Constituents of Concern in Soil Samples at the "0" and 720 14th Street Parcel.

Welcome Years, Inc. HSI No. 10637

Atlanta, Fulton County, Georgia

	Type 1 RRS ¹	Type 2 RRS ¹	Depth Date	BHV-4 0-6" 9/19/2013	BHV-5 6-12" 9/19/2013				BHV-6 18-24" 9/19/2013			
					18-24"	6'	8'		18-24"	4'	6'	8'
Volatile Organic Compounds, mg/kg												
Acetone	400	--		NA	<0.12	NA	<0.14	<0.14	NA	<0.11	NA	NA
Benzene	0.5	0.055		NA	<0.0061	NA	<0.0070	<0.0068	NA	<0.0056	NA	NA
Toluene	100	--		NA	<0.0061	NA	<0.0070	<0.0068	NA	<0.0056	NA	NA
Ethylbenzene	70	--		NA	<0.0061	NA	<0.0070	<0.0068	NA	<0.0056	NA	NA
m,p-xylenes	1,000	--		NA	<0.012	NA	<0.014	<0.014	NA	<0.011	NA	NA
o,xylenes	1,000	--		NA	<0.0061	NA	<0.0070	<0.0068	NA	<0.0056	NA	NA
Cyclohexane	20	--		NA	<0.0061	NA	<0.0070	<0.0068	NA	<0.0056	NA	NA
Chlorobenzene	10	4.21		NA	<0.012	NA	<0.014	<0.014	NA	<0.011	NA	NA
Isopropylbenzene	21.9	--		NA	<0.0061	NA	<0.0070	<0.0068	NA	<0.0056	NA	NA
Naphthalene	100	NC		NA	<0.00612	NA	<0.00697	<0.00677	NA	<0.00562	NA	NA
1,2-Dichlorobenzene	60	--		NA	<0.0061	NA	<0.0070	<0.0068	NA	<0.0056	NA	NA
1,3-Dichlorobenzene	60	--		NA	<0.0061	NA	<0.0070	<0.0068	NA	<0.0056	NA	NA
1,4-Dichlorobenzene	7.5	--		NA	<0.0061	NA	<0.0070	<0.0068	NA	<0.0056	NA	NA
Metals, mg/kg												
Arsenic	20	6.08		<5.78	<5.13	<5.46	<5.81	NA	<4.94	<5.35	<5.95	<5.58
Barium	1,000	2,578		132	137	275	226	NA	99.6	57.3	284	324
Cadmium	2	11.8		1.98	0.831	1.51	1.44	NA	0.692	<0.535	2.38	2.09
Chromium	100	117,321		7.03	14.8	41.7	77.3	NA	20.4	<5.35	27.4	87.1
Lead	75	418		115	24.8	17.2	10.4	NA	14.6	10.9	13.2	12.8
Mercury	0.5	4.90		0.0645	<0.0558	<0.0470	<0.0570	NA	<0.0457	<0.0525	<0.0552	<0.0542
Silver	2	17		<5.78	<5.13	<5.46	<5.81	NA	<4.94	<5.35	<5.95	<5.58

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in Attachment C of the VRP

Application dated November 2011.

*Sample analyzed outside of recommended hold time

NC- Not Calculated

NA- Not Analyzed

Bold-Analyte Detected

Bold- Exceeds both the Type 1 and Type 2 RRSs

Table 3. Summary of Constituents of Concern in Soil Samples at the "0" and 720 14th Street Parcel.

Welcome Years, Inc. HSI No. 10637

Atlanta, Fulton County, Georgia

	Type 1 RRS ¹	Type 2 RRS ¹	Depth Date	BHV-7			
				1-1.5'	2.5'	4'	6'
Volatile Organic Compounds, mg/kg				9/19/2013			
Acetone	400	--		NA	NA	<0.13	NA
Benzene	0.5	0.055		NA	NA	<0.0067	NA
Toluene	100	--		NA	NA	<0.0067	NA
Ethylbenzene	70	--		NA	NA	<0.0067	NA
m,p-xlenes	1,000	--		NA	NA	<0.013	NA
o,xlenes	1,000	--		NA	NA	<0.0067	NA
Cyclohexane	20	--		NA	NA	<0.0067	NA
Chlorobenzene	10	4.21		NA	NA	<0.013	NA
Isopropylbenzene	21.9	--		NA	NA	<0.0067	NA
Naphthalene	100	NC		NA	NA	<0.00671	NA
1,2-Dichlorobenzene	60	--		NA	NA	<0.0067	NA
1,3-Dichlorobenzene	60	--		NA	NA	<0.0067	NA
1,4-Dichlorobenzene	7.5	--		NA	NA	<0.0067	NA
Metals, mg/kg							
Arsenic	20	6.08		<6.34	<6.47	<6.32	<6.44
Barium	1,000	2,578		210	216	181	159
Cadmium	2	11.8		3.22	2.06	2.87	3.25
Chromium	100	117,321		90.8	552	38	55.2
Lead	75	418		600	85.3	54.8	20.8
Mercury	0.5	4.90		0.0791	<0.0569	<0.0626	<0.0632
Silver	2	17		<6.34	<6.47	<6.32	<6.44

Notes:

¹Risk Reduction Standard (RRS) calculations are provided in Attachment C of the VRP Application dated November 2011.

*Sample analyzed outside of recommended hold time

NC- Not Calculated

NA- Not Analyzed

Bold-Analyte Detected

Bold- Exceeds both the Type 1 and Type 2 RRSs

FIGURES



Atlanta Environmental Management, Inc.

Environmental Consulting, Engineering, Hydrogeologic Services

2580 Northeast Expressway • Atlanta, Georgia 30345
Phone: 404.329.9006 • Fax: 404.329.2057

PROJECT #: 1396-1401-08 DRAWN BY: TL

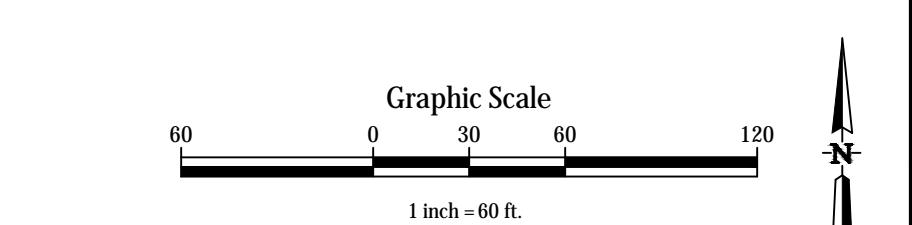
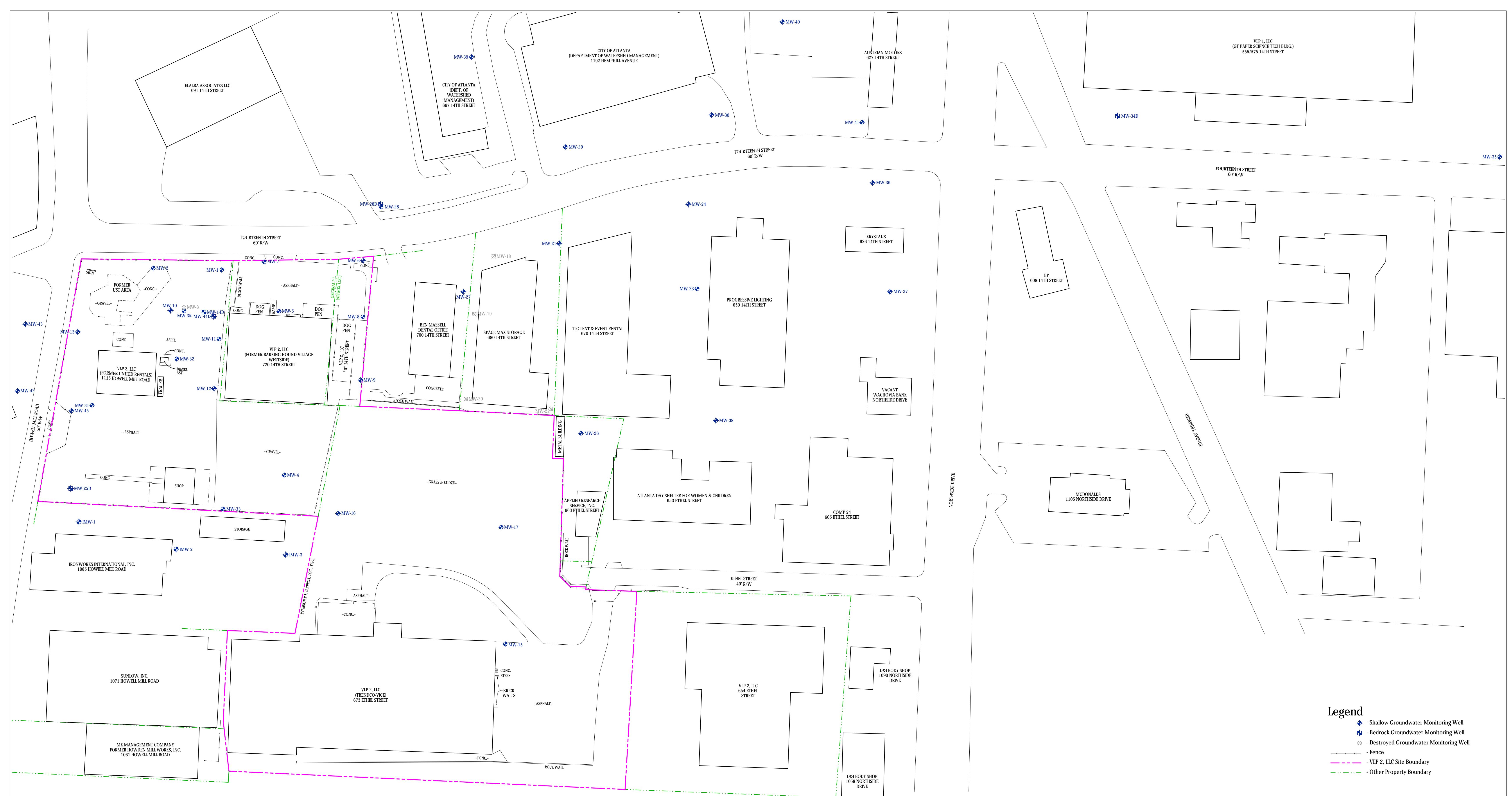
SCALE: 1"=200' DATE: June 8, 2015

VLP 2, LLC PROPERTIES
WELCOME YEARS HSI NO. 10637
ATLANTA, FULTON COUNTY, GEORGIA

**Corrective Action Plan Modification
Location Map**

Figure

1



AEM
Atlanta Environmental Management, Inc.
Environmental Engineering, Geotechnical, Hydrogeologic Services
2580 Northside Drive • Atlanta, Georgia 30345
Phone: 404.329.9006 • Fax: 404.329.2057

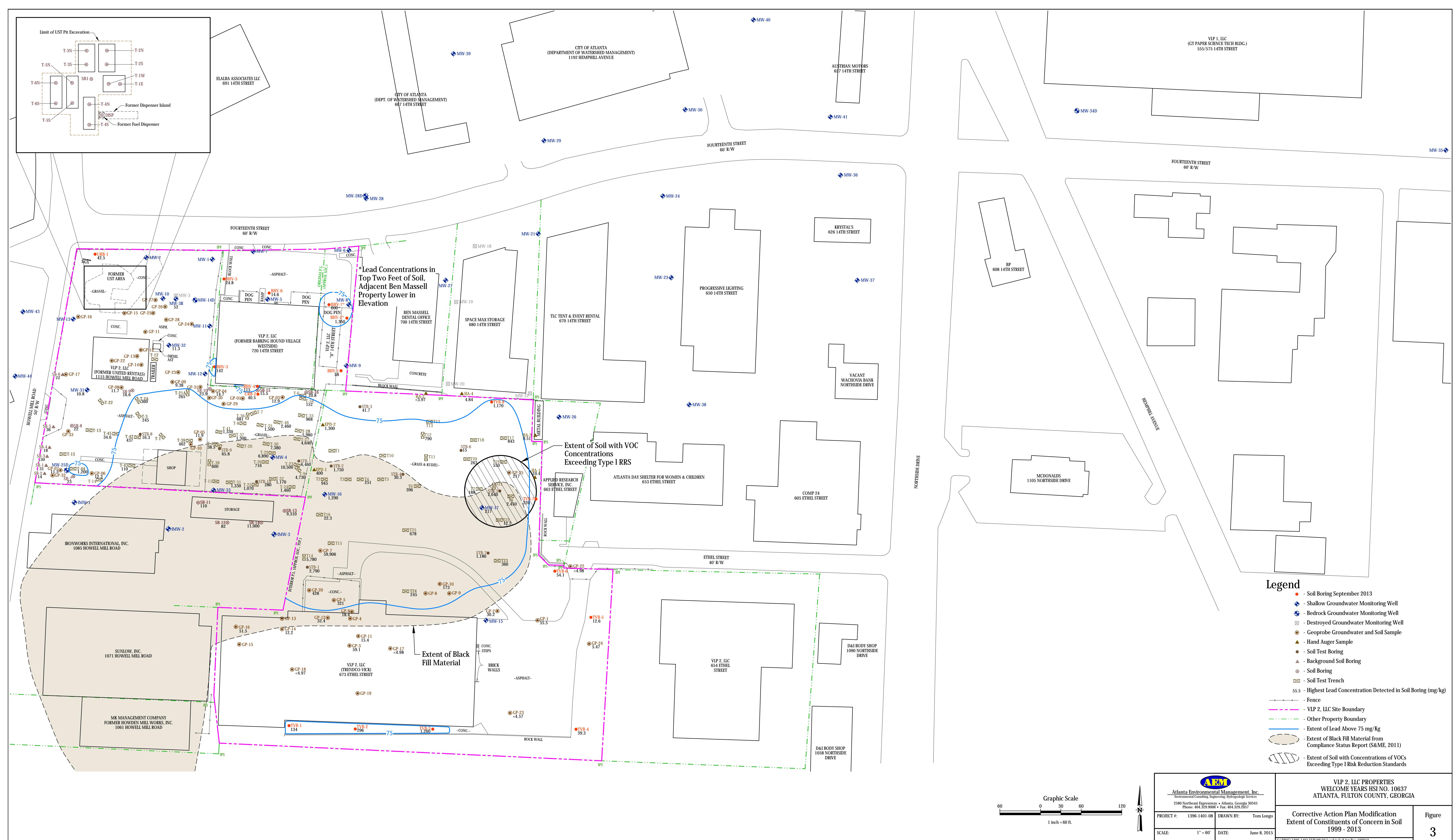
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SCALE: 1" = 60'	DATE: June 8, 2015

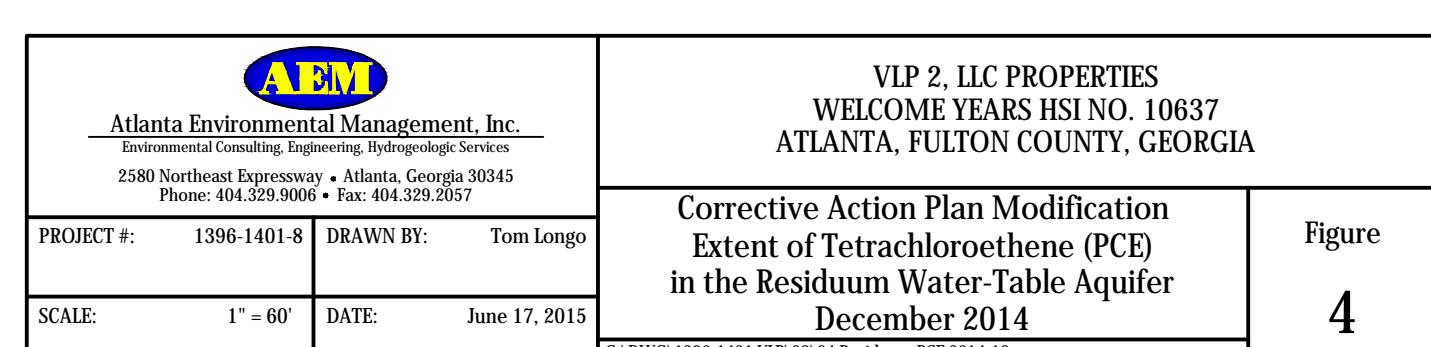
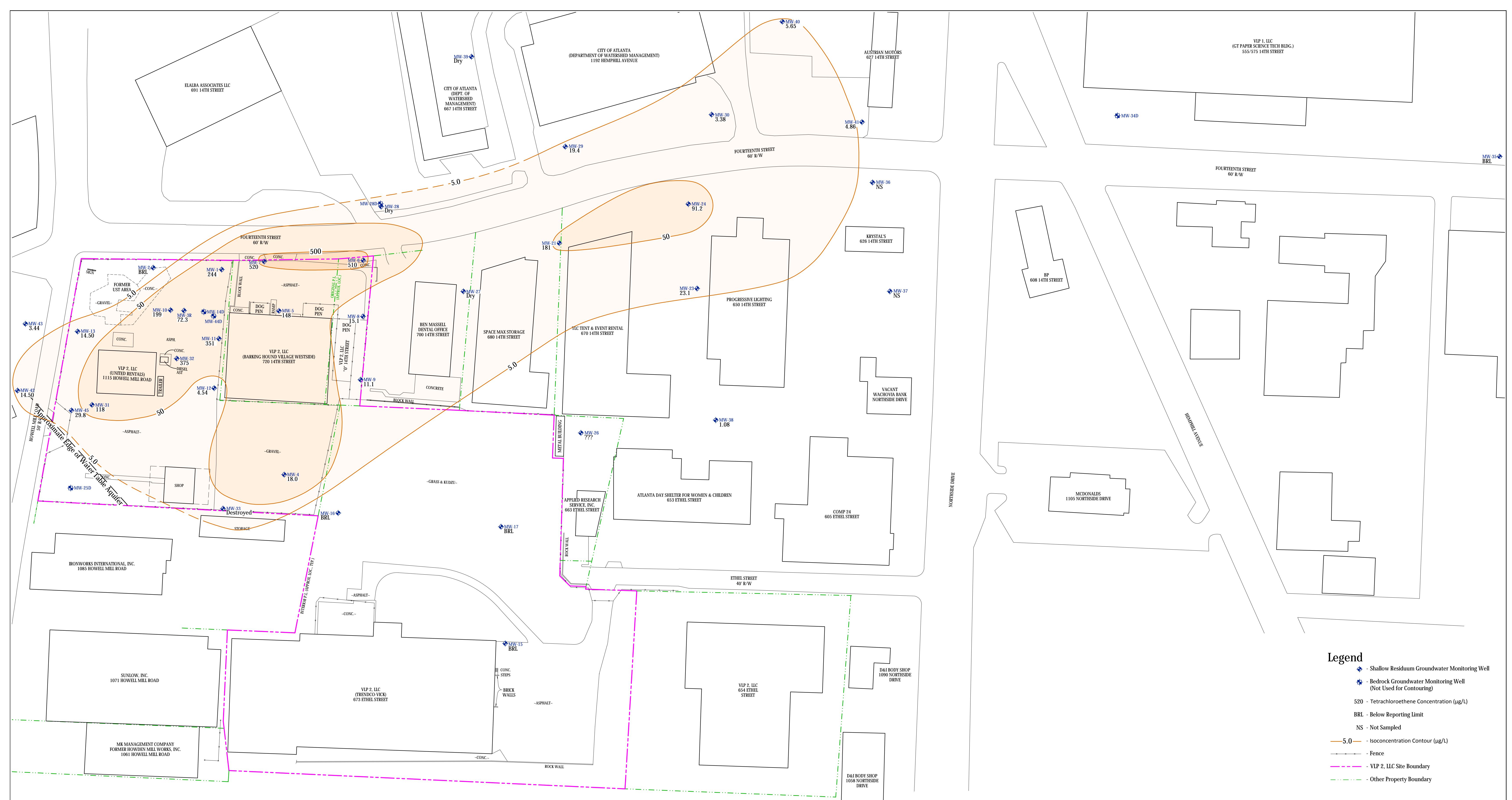
VLP 2, LLC PROPERTIES
WELCOME YEARS HSI NO. 10637
ATLANTA, FULTON COUNTY, GEORGIA

Corrective Action Plan Modification
Site Plan

G:\DWG\1396-1401\VLP08\02 Site Plan

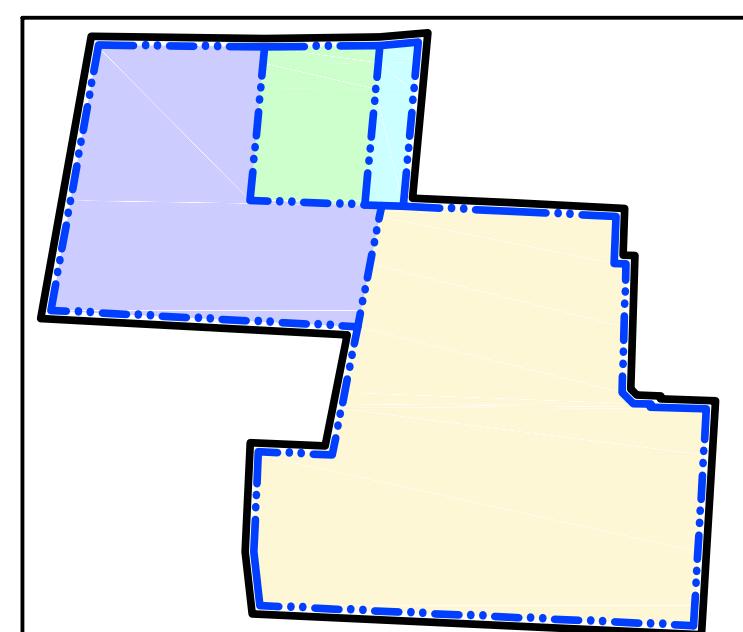
Figure 2



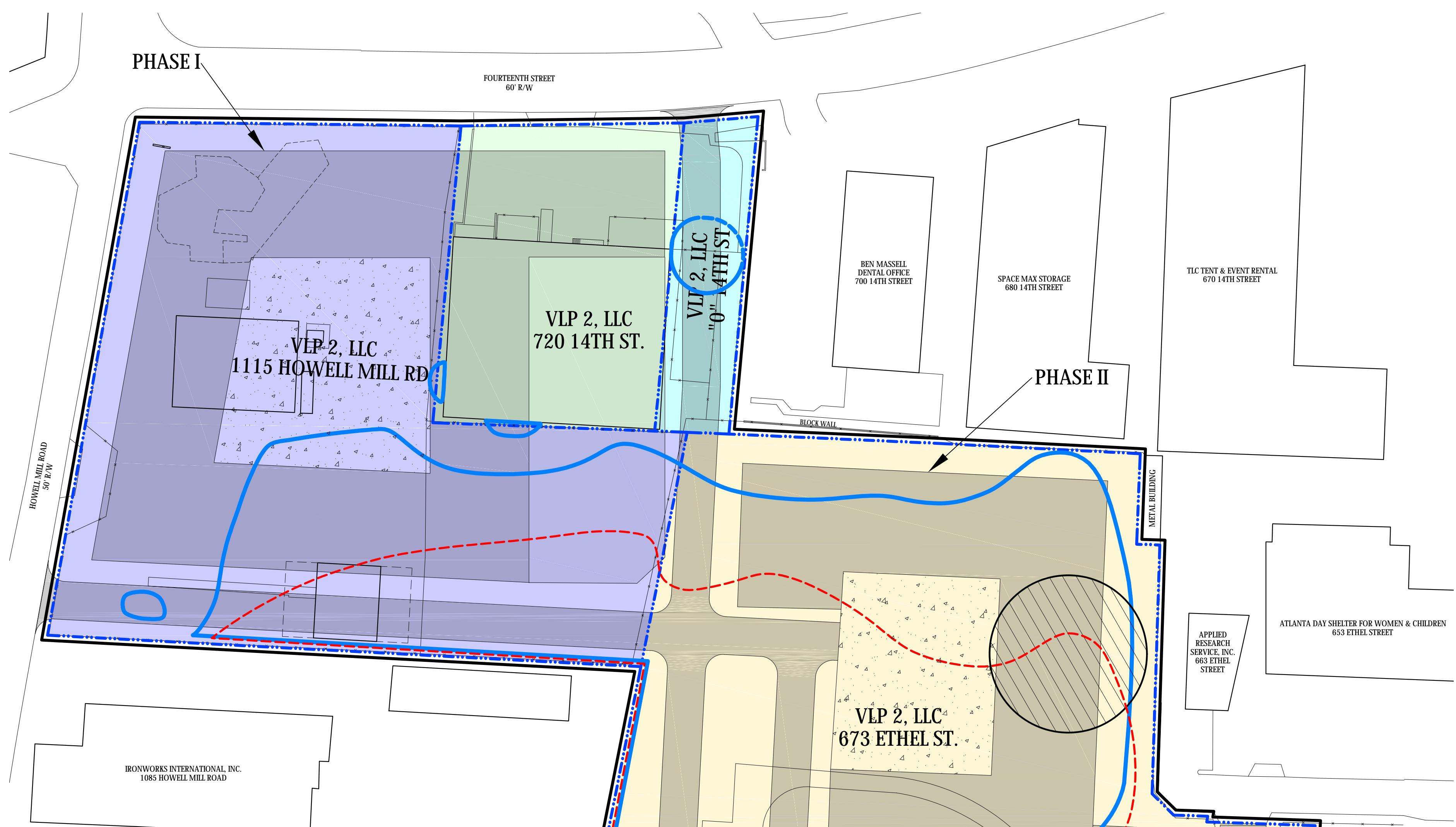


Parcel Legend

- Welcome Years VRP Site Boundary
- Parcels Comprising VRP Site
- 1115 Howell Mill Road
- 720 14th Street
- "0" 14th Street
- 673 Ethel Street

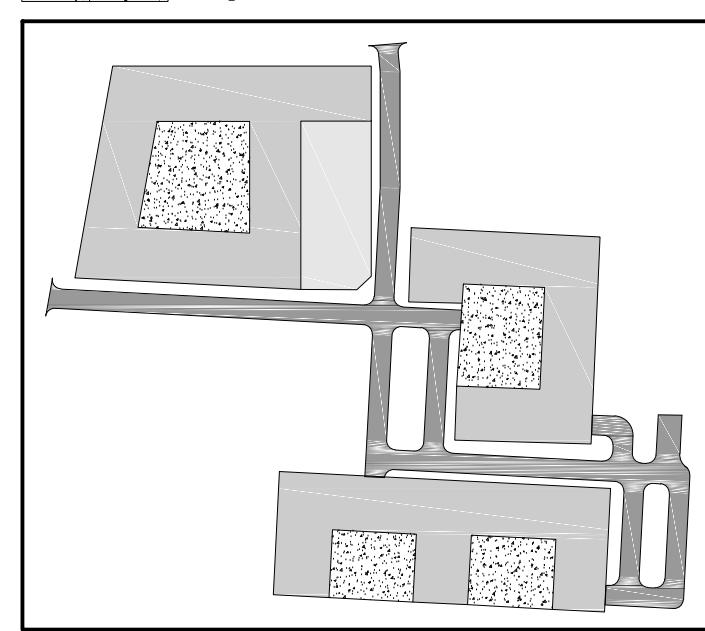


PHASE I

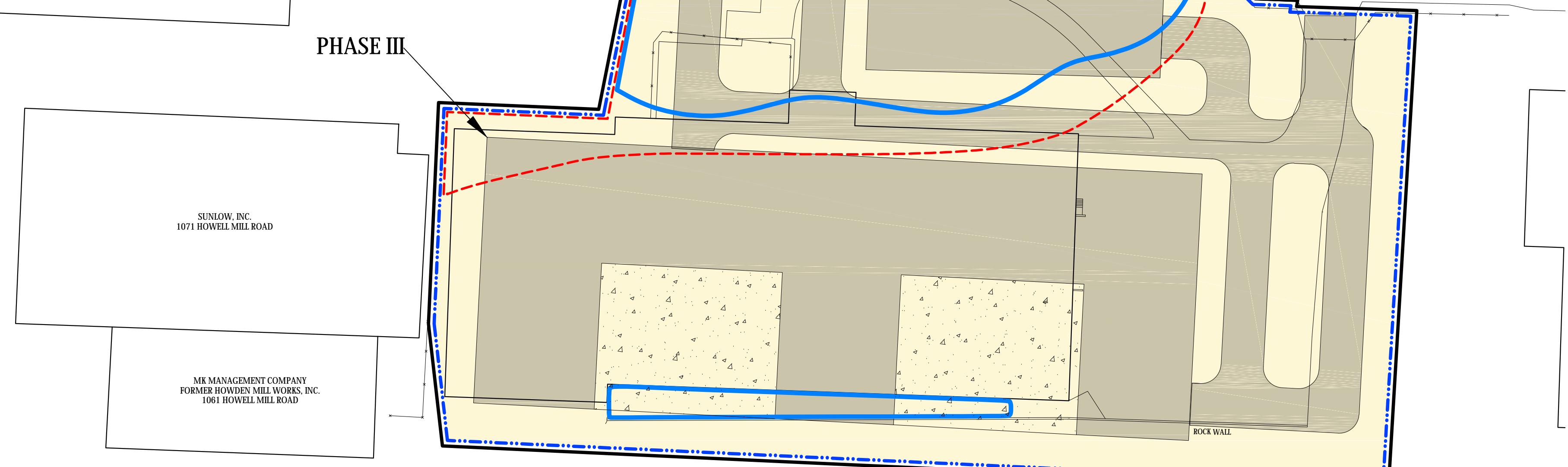


Proposed Structures and Roads

- Proposed Building
- Proposed Parking Deck
- Proposed Road
- Proposed Concrete Podium

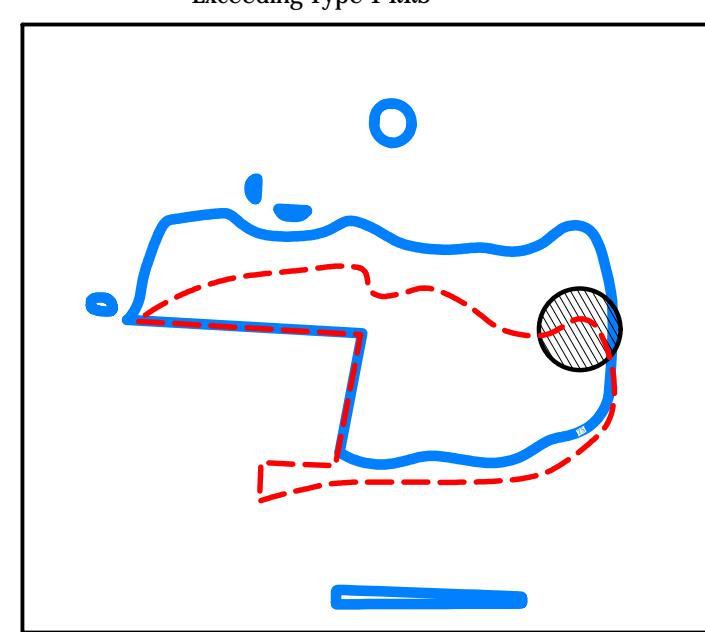


PHASE III



Impacted Soils

- Extent of Lead Above Type 1 RRS (75 mg/Kg)
- Extent of Black Fill Material from Compliance Status Report (S&ME, 2011) Suspected to be Non-Buildable and Requires Excavation
- Extent of Soil with Concentrations of known VOCs Exceeding Type 1 RRS



Graphic Scale
50 0 25 50 100
1 inch = 50 ft.

	Atlanta Environmental Management, Inc.
	Environmental Consulting, Engineering, Hydrogeologic Services
	2580 Northeast Expressway • Atlanta, Georgia 30345
	Phone: 404.329.9066 • Fax: 404.329.2057
PROJECT #:	1396-1401-9
DRAWN BY:	Tom Longo
SCALE:	1" = 50'
DATE:	June 29, 2015

VLP 2, LLC PROPERTIES
WELCOME YEARS HSI NO. 10637
ATLANTA, FULTON COUNTY, GEORGIA

Corrective Action Plan Modification
Preliminary Redevelopment Layout
Phases 1, 2, and 3

Figure 5