

SOIL COVER, MONITORING, AND MAINTENANCE PLAN General Tire aka Continental Tire the Americas - Aldora Plant 160 Aldora Street, Barnesville, Lamar County, Georgia

HAZARDOUS SITE INVENTORY SITE #10057

July 6, 2020; Revised June 12, 2023

Prepared For:

General Tire aka Continental Tire the Americas, LLC 13456 Lovers Lane Culpeper, Virginia 22701

Prepared By:

ECS SOUTHEAST, LLP 1281 Kennestone Circle NE Suite 200 Marietta, GA 30066

ECS PROJECT NUMBER 49:9422

TABLE OF CONTENTS

SECTIO	ON P	AGE
1.0	INTRODUCTION	.1
1.1	SITE AND SOIL COVER LOCATION	. 1
1.2	RESIDUAL CONTAMINATION IN SITE SOIL	. 2
1.3	GROUNDWATER IMPACT IN AREA	. 2
2.0	FUTURE SOIL MANAGEMENT PROCEDURES AND LAND USE RESTRICTIONS	. 3
3.0	SOIL COVER DESCRIPTION	. 4
3.1	PROTECTIVE COVER SOIL	. 4
3.2	SITE CONTROLS	. 4
3.3	FENCING AND SIGNAGE	. 4
4.0	PROTECTIVE SOIL COVER MAINTENANCE & MONITORING	. 6
4.1	VEGETATION MAINTENANCE	. 6
4.2	INSPECTIONS	. 6
5.0	NOTIFICATION AND REPORTING	.7

APPENDICES

APPENDIX I – FIGURES APPENDIX II – CHECKLIST FORM

1.0 INTRODUCTION

This plan prescribes the actions to monitor and maintain the integrity of the vegetated protective soil cover overlying five former waste trenches closed in place at the subject site. This plan has been updated prior to the beginning of the Monitoring and Maintenance period.

The filled trenches area of a subdivided 1.983 acres covered by this plan (Tract 2) is in Land Lot 40 and 41 (7th District) within Lamar County, Georgia in the Paramount Surveys survey plat dated October 30, 2019. The 22.7-acre Tract 1 is situated west-northwest of the Continental Tire the Americas LLC's (Continental Tire) main facility at 160 Aldora Street, Barnesville, Georgia (see Figure 1). The facility property is listed on the Georgia Environmental Protection Division (GAEPD) Hazardous Site Inventory (HSI) as site #10057, with the last reported property owner General Tire c/o Continental Tire, P.O. Box 5000, Ft. Mill, South Carolina 29716-5000.

The placement of a soil cover was at the request of the GAEPD following an on-site discussion when the GAEPD staff noted trench areas in the north portion of Tract 2 had slightly sunken surfaces. Continental Tire was requested to fill and smooth out the surface of these sunken trenches to reduce surface ponding over the fill debris trenches. The topographic surfaces of the trench area were surveyed to identify the areas to be covered.

The soil cover is considered an engineering control providing a physical barrier and preventing environmental exposure, and by itself, results in the site meeting Type 5 Risk Reduction Standards as defined in Rule 391-3-19-.07(10)(a) of the Hazardous Sites Response Act (HSRA). The soil cover was designed as a protective layer to prevent human and ecological exposure to debris that remain in soil below the soil cover. Therefore, this plan when implemented will provide on-going directives that the environmental soil cover is managed in a manner that preserves the soil cover structure and integrity and minimize potential exposure to materials buried in the underlying trenches.

1.1 SITE AND SOIL COVER LOCATION

The attached Paramount Surveys plat dated November 15, 2019 identifies the area of the trenches where sunken surfaces were noted. The area was subdivided and is labeled by Paramount Surveys as Tract 2 (a 1.983-acre area) with the larger parent area labeled as Tract 1 (22.7 acres). The waste trenches with sunken surfaces were positioned generally in a north to south alignment in the subdivided Tract 2 area (see Figure 2). The general dimensions of the soil covered waste trenches were approximately 250 feet by 330 feet. The northern most (one-fourth) portion of Tract 2 filled trench area lies within Land Lot 40 and the majority of the Tract 2 filled trench area is in Land Lot 41. The entire 1.983-acre subdivided area is included in the restrictive Universal Environmental Covenant (UEC) to be placed on the land. The trenches are identified as Trench "A" (or "1" in the Compliance Status Report [CSR]) on the western side sequentially over to Trench "E" (or "5" in the CSR) on the eastern side of the UEC area.

The general property in this portion of the facility currently consists of an open grass field with a narrow line of trees around the boundaries. The Tract 2 area is essentially rectangular in shape, and it is bounded to the north by Aldora Street (Old Zebulon Road), which generally parallels a railroad line that runs just north of this street, and on the west, south, and east by Tract 1, the larger parent parcel which consists of approximately 22.7 acres of mostly open grasslands. A propane tank farm is located farther

south on Tract 1 approximately 250 feet south of the soil cover area. The location of the soil cover relative to the surrounding area, and coordinates (State Plan) for the corners of the subdivided surface cover area, will be provided once installation of the soil cover is completed.

1.2 RESIDUAL CONTAMINATION IN SITE SOIL

Based on information provided in a landfill evaluation and hazardous waste site ranking draft report dated March 1989 (no preparer name indicated), the trenches were filled with mostly empty drums and drums of solidified process wastes, burlap, 1,1,1-trichloroethane, solid dip waste and liquid resorcinol and formaldehyde dip from the tire cord manufacturing process, latex, resins and laboratory acids (trichloroacetic acid, methylene chloride, formic acid, nylon polymer solutions). Additionally, other wastes reportedly included general building materials, hydraulic oil, domestic wastes and other miscellaneous waste during the period from 1965 to approximately 1980.

As documented in the Georgia HSI listing, soil is reported with a known release of Carbon Disulfide and 1,1-Dichloroethane, chloroform, Tetrachloroethene, and Dichloromethane are identified as regulated substances in the soil. These constituents have not been confirmed in soils above the static water table. The groundwater at the site is listed as having a known release of Carbon Disulfide and the other contaminants listed for groundwater include 1,1-Dichloroethane, chloroform, Tetrachloroethene, and Dichloromethane.

Select metals (barium, beryllium, chromium, copper, lead, and zinc) have also been detected in soil collected from the area surrounding the trenches; however, reported metal detections were below respective notification concentrations. The soils around the trench area were sampled during a 1995 study in 3 locations and the samples were analyzed for volatile organic compounds and semi-volatile organic compounds. No VOC or SVOC constituents were reported above detection limits as reported in a RUST Environment & Infrastructure, Inc. October 23, 1995 report.

1.3 GROUNDWATER IMPACT IN AREA

The groundwater in the immediate area had been impacted by VOCs and metals. The area to the west of the filled trenches has a series of monitoring and extraction wells. These wells have been monitoring periodically since the first wells were installed around 1982. Over the years, 22 monitoring wells have been installed and 18 extraction wells have been installed.

The monitoring wells at the site have been sampled and analyzed annually since 2000. The wells were monitored twice in 2019 – once when the extraction system had been turned off for 3 months during winter and then 4 months later. The extraction wells remove groundwater which is then pumped to a holding tank and then discharged to the public sanitary waste system. The extraction system is turned off during periods of cold weather to prevent breakage due to freezing temperatures.

2.0 FUTURE SOIL MANAGEMENT PROCEDURES AND LAND USE RESTRICTIONS

There are currently no planned actions that would result in changes to the environmental soil cover, nor are there any activities planned to disturb either the finished soil cover or vegetation. Signage placed at the soil cover indicates that Continental Tire and the GAEPD must be contacted prior to any invasive work in the footprint of the environmental soil cover (see Section 3.3).

Additionally, a restrictive UEC will be placed to indicate that "Any activity on the Property, including, but not limited to construction activities, that may result in the release or exposure to the regulated substances that were contained as part of the corrective action, or create a new exposure pathway, is prohibited with the exception of work necessary for the maintenance, repair, <u>or</u> replacement of soil cover or other engineered controls. Activities that are prohibited in the soil covered areas include, but are not limited to the following: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork."

3.0 SOIL COVER DESCRIPTION

The environmental soil cover was designed to meet the engineering control requirement that results in a two-foot, self-sustaining protective barrier above the site area with sunken trenches. The dimensions of the soil cover conform to the approximate area of the landfill trenches identified by the GAEPD during the on-site meeting and the area surveyed.

3.1 PROTECTIVE COVER SOIL

As specified in GAEPD correspondence (dated October 3, 2019), an engineered clay cap is not required at this time. The area is currently vegetated but the surface has several subsidence depressions that a soil cover above the waste trenches will fill. Fill soil was used to raise the surface elevation and topsoil was placed on the top for vegetation growth. Grading stakes were implemented during soil placement and at least 2 feet of soil was placed over the sunken trenches. The soil cover was graded (crowned) to enable surface run-off to the margins of the trenched area. The soil cover includes at least 2 feet of vegetated soil that will be subsequently maintained (see Section 4.1).

Prior to the placement of the soil cover, the existing trees, brush an old fencing were be removed. Minimal grading of the existing surface was implemented to minimize disturbance to the filled trench area. Where needed, additional clean soil was placed to extend over the margins of the filled trenches. The soil cover was subsequently graded to minimize the likelihood of future surface ponding of storm water. The edges of the filled trench area soil cover were tapered downwards past the edge of the trench to prevent the formation of preferential storm water erosion paths.

Borrowed material (soil) used for the completion of the soil cover was obtained from an off-site source. Soil samples were collected from the borrow source prior to the construction of the soil cover to ensure that only clean (non-contaminated) soil was utilized in the construction of the cover. The soil was analyzed for VOCs and RCRA 8 metals. Borrow soils did not have detectable VOC or metals concentrations that exceeded HSRA notification concentrations. The results of the confirmation soil samples from the borrow material were provided to GAEPD in the Compliance Status Report.

3.2 SITE CONTROLS

Tract 2 is unoccupied and without structures or known utilities. Therefore, access to this site will be limited to authorized personnel (Continental Tire) and the landscape contractor. Site controls (locked drive gate and security personnel checks) are provided to prevent unauthorized access to the property or the environmental soil cover.

3.3 FENCING AND SIGNAGE

The Tract 1 area and the Tract 2 area are fenced (six-foot high chain linked with 3-strand barbed-wire at top) to prevent unauthorized access. A locked access gate to the Tract 2 UEC area is located along Aldora Street at the north side of the area. Signs constructed of stainless steel has been placed around the boundary of Tract 2 with the following caption:

AREA SUBJECT TO ENVIRONMENTAL COVENANT & RESTRICTION HSI# 10057 PRIOR TO DIGGING OR COMMENCING ANY OTHER LAND DISTURBANCE ACTIVITY,

CALL CONTINENTAL TIRE AT (770) 358-1150 OR GEORGIA ENVIRONMENTAL PROTECTION DIVISION (404) 657-8600

Further, should the site ownership change, and responsibility for the soil cover maintenance and inspections be delegated to the new owner, new signage will be required to amend the contact information.

4.0 PROTECTIVE SOIL COVER MAINTENANCE & MONITORING

Soil and vegetation (seeded grass) placed above the waste trenches constitute the protective soil cover. Monitoring of the protective vegetated soil cover integrity will be performed as part of the scheduled inspections (see Section 4.2). Maintenance is likely to include the removal of invasive vegetation, repairing any erosional features that form on the surface of the soil cover, and repairs to the soil cover caused by burrowing creatures. In the event that erosion soil disturbance occurs, or the thickness of the protective cover is believed to fall below two feet, then the soil thickness will be restored to a thickness of two feet and the repair section reseeded or sodded.

4.1 VEGETATION MAINTENANCE

The initial seeded vegetation cover consisting of fescue or Bermuda grass may in time revert to other native plant materials (grasses) that are equally capable of stabilizing soil within the root mass. However, unless required to control nuisance vegetation, no effort, other than periodic cutting of the grass overlying the cover soil, will be made to maintain the vegetation. Vegetation management will consist primarily of volunteer tree and bush control to prevent root damage to the soil cover. In addition, plant material will be cut back as necessary during inspections (or more frequently if indicated by the inspections) to ensure that the soil cover integrity and signage remain visible and therefore easily verified as having full integrity, in accordance with the planned inspections.

4.2 INSPECTIONS

In order to verify, document, and report the sustained integrity of the protective cover, a series of inspections, consisting initially of four quarterly, then two semiannual, followed in perpetuity by annual inspections, will be performed and reported by the property owner at the time of such inspections in accordance with the restrictive UEC. Inspections will be standardized on field forms to ensure consistent observation and records. The inspections will observe the vegetative conditions, the surface slopes and the perimeter fencing with signage, inclusive of drainage ditch fence extension. Trench marker pins may require survey support for locating and inspection. Modifications may be necessary to improve visibility of the marker locations and will be evaluated during inspection periods. The standard inspection form that will be used is provided in **Appendix II**. This inspection form may be modified, as needed, to better document the inspection conditions.

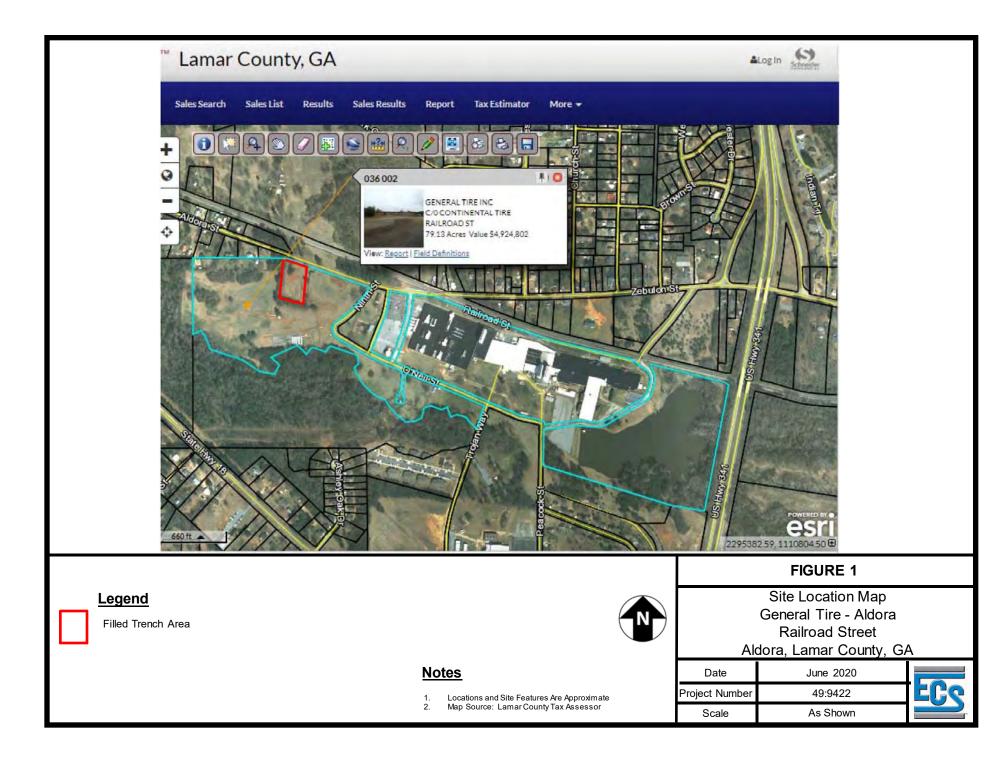
5.0 NOTIFICATION AND REPORTING

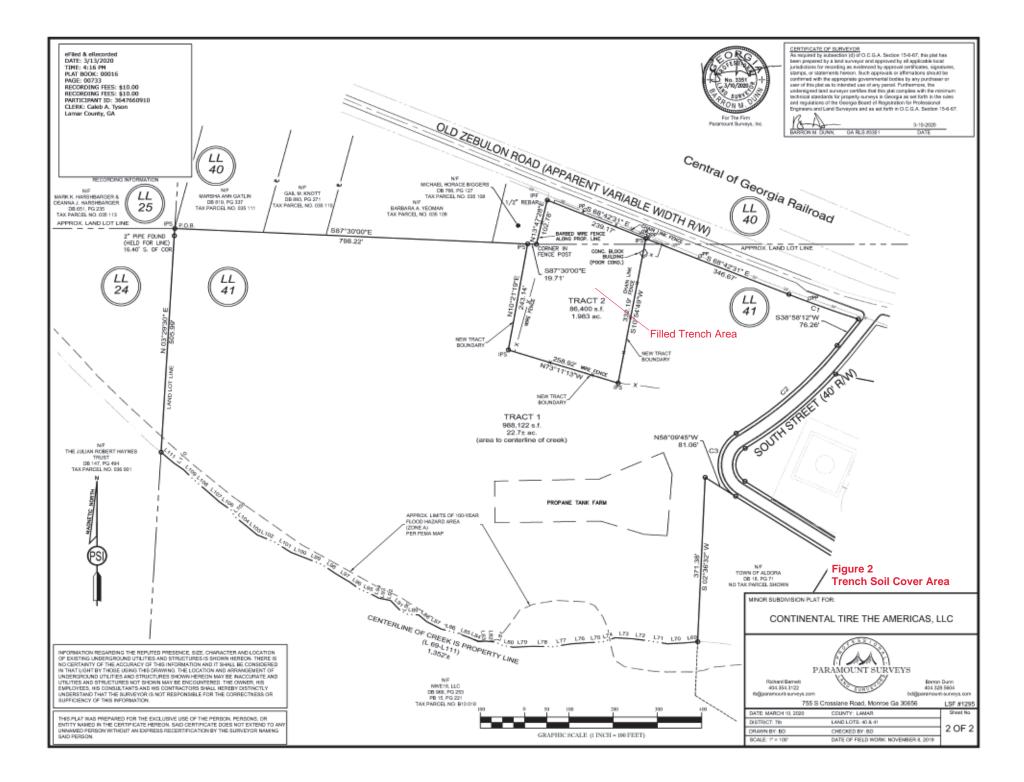
Reports of the inspected condition of the environmental soil cover, including repairs or maintenance as needed or performed, will be submitted to GAEPD on a December 31 annual basis and the reports will be provided no later than January 15 of each calendar year. The report will consist of a letter from the property owner and will include the completed and certified inspection form in Appendix II.

In the event that the environmental soil cover has been found to be disturbed or damaged, notification will be sent toGAEPD and Continental Tire along with documentation of the repair. In the event that the owner becomes aware of a planned disturbance of the integrity of the protective cover, then at least 30 days' notice will be provided to GAEPD and Continental Tire along with a description of the planned activity, the planned repairs at the conclusion of the activity, and a plan for disposition of any soil that is displaced from beneath the environmental soil cover. No invasive work shall be conducted without prior consent and approval from GAEPD and Continental Tire. Contact information is detailed in the UEC.

APPENDIX I

FIGURES and Drawings





Continental Tire - Soil Trench Cover Thickness / November 2022 and May 2023

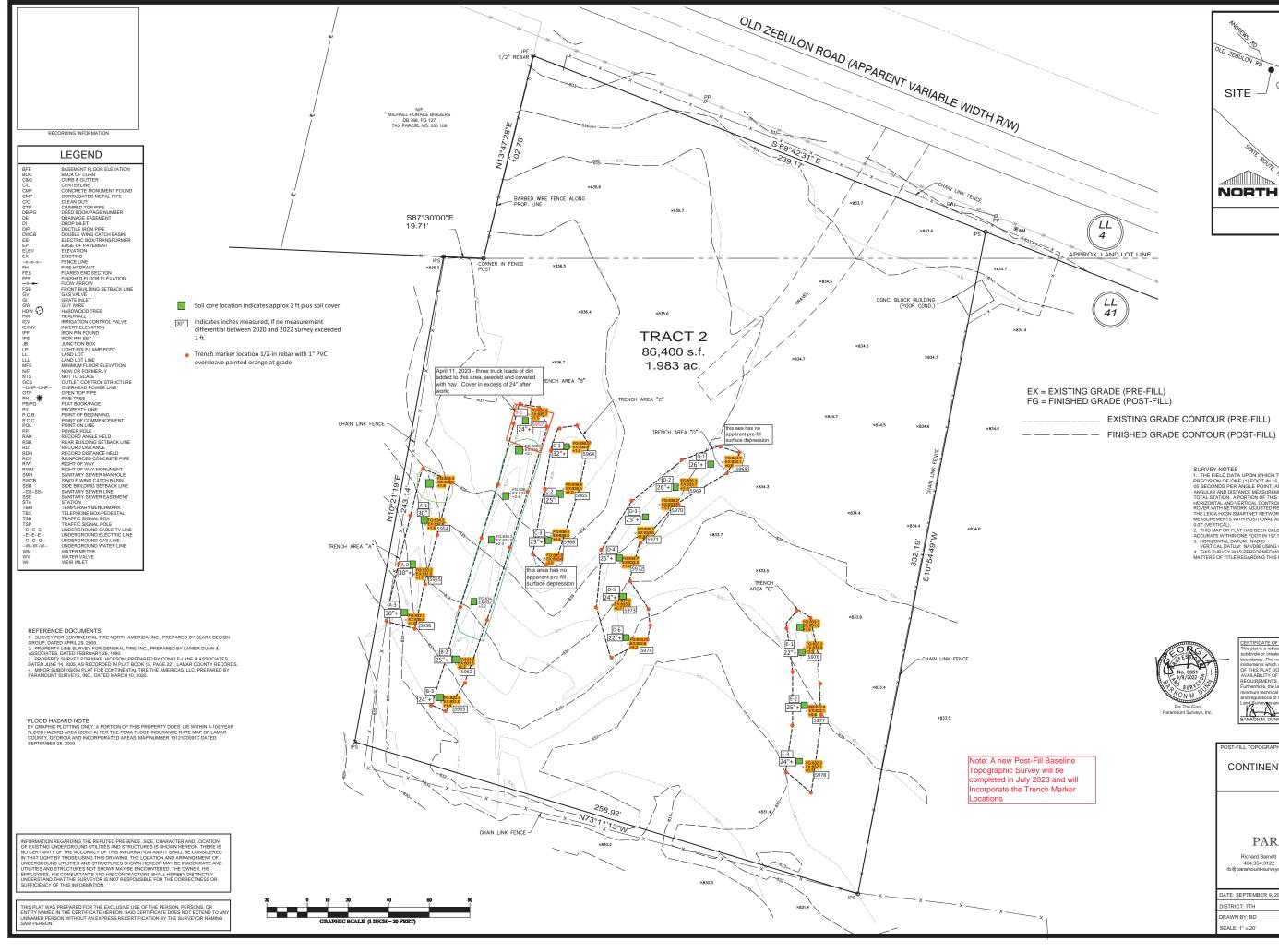
All measurement are in Inches

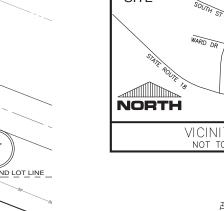
		Soil Cover Thickness				
Trench	Stake #	11/11/2022 ⁽¹⁾	11/18/2022 ⁽²⁾	4/11/2023 4 truckloads Fill added to north end of Trench B ⁽³⁾		
A-1	5954	no collection	30+			
A-2	5955	6.5-12	30+			
A-3	5956	11+	30+			
B-1	5957	>20	21	30+		
B-2	5962	25+				
B-3	5963	24+				
C-1	5964	32+				
C-2	5965	25+				
C-3	5966	23+				
D-1	5968	26+				
D-2	5969	26+				
D-3	5970	25+				
D-4	5972	25+				
D-5	5973	24+				
D-6	5974	22+				
E-1	5976	22+				
E-2	5977	25+				
E-3	5978	24+				

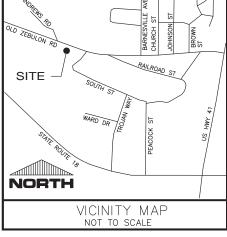
 $^{\rm (1)} November$ 11 -All sampling tubes pushed to 30 inches

⁽²⁾November 18 - hand auger to 30 inches

⁽³⁾ April 11, 2023; 4 truckloads of fill brought in to cover Trench B







EXISTING GRADE CONTOUR (PRE-FILL)

SURVEY NOTES 1. THE FIELD BATA UPON WHICH THIS MAP OR PLAT IS BASED HAS A CLOSURE PRECISION OF ONE (1) FOOT IN 15,897 FEET AND AN AVERAGE ANGULAR ERROR OF OF 05 SECONDO FER ANGLE POINT, AND WAS ADJUSTED USING COMPASS RULE. ANGULAR MOLE POINT, AND WAS ADJUSTED USING COMPASS RULE. ANGULAR MOLE POINT, AND WENT AND WAS ADJUSTED USING COMPASS RULE. ANGULAR MOLE POINT, AND VERTACL CONTROL, WAS PERFORMED USING A CARLSON BRAY ONS ROVER WITH NETWORK ADJUSTED REAL TIME KINEMATIC MEASUREMENTS REFERENCED TO THE LICE AND VERTACL CONTROL, WAS PERFORMED USING A CARLSON BRAY GMSS ROVER WITH NETWORK ADJUSTED REAL TIME KINEMATIC MEASUREMENTS REFERENCED TO THE LICE AND SHATCH THE WORK. THE GORS SURVEY INCLUDED REDUNDANT MEASUREMENTS WITH POSITIONAL ACCURACY OF BETTER THAN 0.04 (HORZONTAL) AND 107 (VERTICAL). AT HAS BEEN CALCULATED FOR CLOSURE AND IS FOUND TO BE ACCURATE WITHIN ONE FOOT IN 197.704 FEET. 3. HORIZONTA DATUM. NAVOBB USING GEOID MODEL GEOID2018 VERTICAL DATUM. NAVOBB USING GEOID MODEL GEOID218 VERTICAL DATUM. NAVOBRE USING WITH THE BENEFIT OF AN ABSTRACT OF TITLE. ALL ANTERS OF TITLE REGARDING THIS PROPERTY ARE EXCEPTED.

PS

 CERTIFICATE OF SURVEYOR

 This joil is a intracement of an existing parcel or parcels of land and does not subdrived or create a new parcel or make any changes to any real property boundaries. The recording information of the documents, maps, plats, or other instruments which created the parcel or parcels are stated hereon. RECORDATION OF THIS PLAT DOES NOT IMPLY APPROVAL OF ANY LOCAL JURISDICTION, VAVILABILITY OF PERNITS, COMPLIANCE WITH LOCAL REGULTATIONS OR REQUIREMENTS, OR SUITABILITY FOR ANY USE OR PURPOSE OF THE LAND Furthermore, the undersigned lated averyor centifies with the plat complex with the minimum technical standards for property surveys in Georgia as set forth in the rules and regulation of the Georgia Board of Regatzion (or Pofessional Engineers and Lawyower, and as set forth in O.C.G.A. Section 15-67.

 BARRON M. DUNN, GA RLS 3351
 DATE

POST-FILL TOPOGRAPHIC SUF		ERICA	AS, LLC		
PARAMOUNT SURVEYS Richard Barnett 404.354.3122 rb@paramount-surveys.com P.O. Box 1024, Madison, GA 30650 LSF #1295					
DATE: SEPTEMBER 9, 2022	COUNTY: LAMAR				
DISTRICT: 7TH	LAND LOTS: 40 & 41		Sheet Number		
DRAWN BY: BD	CHECKED BY: BD		1 of 1		
SCALE: 1" = 20'	DATE OF FIELD WORK: 9	9/8/2022			

APPENDIX II

SOIL COVER INSPECTION & MAINTENANCE CHECKLIST

NON-RESIDENTIAL SITE USE AND SOIL TYPE 5 RRS COMPLIANCE ENGINEERING CONTROL INSPECTION FORM

Tract 2, Continental Tire Aldora Plant, HSI Site No. 10057

ТҮРЕ	No.	CRITERIA RESPONSE	YES	NO
Land Use	1	Does this HSRA site meet the conditions under the existing environmental covenant?		
	1a	If no to 1, provide a written explanation (attached) to GAEPD within 30 days.		
Exposure	2	Are site workers expected to be directly exposed to soils with chemical concentrations in excess of Type 3/4 (non-residential) RRS at this HSRA site in excess of 250 days per year?		
	2a	If yes to 2, are these same site workers expected to be exposed to soils at this HSRA site in excess of 25 years throughout their career?		
Erosion	3	Is there evidence of soil erosion in the soil cover area?		
	3a	If yes to 3, is there evidence of erosion of these soils to off-property areas?		
	3b	If yes to 3a, are corrective measures being taken?		
	3c	If yes to 2, 3, 3a, and/or 3b, provide written explanation (attached) to the GAEPD within 30 days.		
Integrity	4	Is the integrity of the soil cover being maintained (no soil subsidence or evidence of burrowing) and is fencing secured around property?		
	4a	If no to 4, are corrective measures being taken?		
	4b	Is fencing and drainage swale fence extension in good condition and signage clearly visible and readable indicating the area is subject to an Environmental Covenant and inclusive of contact numbers for Continental Tire and GAEPD		
	4c	If no to 4b, are corrective measures being taken?		
	4d	Vegetation is adequate, properly controlled, and providing soil protection?		
	4e	If no to 4d, are corrective measures being taken?		
	4f	Are the flush grade trench markers visible and in good condition		
	4g	If no to 4f, are corrective measures being taken?		
Inspection	5	Date of inspection:		
	5a	Name of inspector:		
	5b	Photographs and/or diagrams showing current land use (attached)		

Certification:

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.

NAME (Please type or print)

TITLE

APPENDIX III

PHOTOGRAPHIC DOCUMENTATION OF ADDITIONAL FENCING AND TRENCH MARKER PINS



