



MONITORING AND MAINTENANCE PLAN

**139 Brampton Road (Former Rheem Manufacturing)
Savannah, Chatham County, Georgia
HSI Site No. 10208**

**Prepared For:
EKG, LLC a Georgia Corporation
and
Rheem Manufacturing Company**

Prepared By:
WSP Environment & Infrastructure Inc.
2677 Buford Highway NE
Atlanta, GA 30324

10 October 2022

WSP Project No. 6121-09-0220



10 October 2022

Monitoring and Maintenance Plan
139 Brampton Road (Former Rheem Manufacturing)
Savannah, Chatham County, Georgia
HSI Site No. 10208
Tax Parcel ID #1-0720-01-002

Attention:

The following Monitoring and Maintenance Plan sets forth the obligations of the owner of the property for the monitoring and maintenance of engineered controls and institutional controls at the subject property. This document is kept at the office on the premises. Any comments or questions regarding this document should be directed to the Property Owner at 912-414-7144.

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1.0 INTRODUCTION

The property subject to this Monitoring and Maintenance Plan (the "Property") is the 11.1-acre property located at 139 Brampton Road, Savannah, Chatham County, Georgia, which is further identified by the tax parcel ID number 1-0720-01-002. A Property tax map is attached in Appendix A.

The Property is commercially developed with various structures which are currently leased for warehousing and for office space. Refer to Figure 1 in Appendix B for a Property location map. An aerial photograph of the Property and surrounding area is included as Figure 2.

The Property was admitted into the Georgia Voluntary Remediation Program (VRP) on October 4, 2011. Under the provisions of the VRP, a series of soil and groundwater assessments, soil remediation and other activities have been performed. A Compliance Status Report (CSR) dated May 6, 2016 and a CSR Addendum dated July 8, 2019 were submitted to the VRP and approved in a letter issued February 19, 2020 by the Environmental Protection Division (EPD).

As described in the CSR, remediation of volatile organic compound (VOCs) in soil located beneath a portion of the warehouse was impracticable. In addition, impacts to groundwater remain above non-residential cleanup criteria. Therefore, engineered and institutional controls have been applied as a remedy consistent with a Type 5 risk reduction standard (RRS.) The intent of the remedy is to (1) prevent exposure to VOCs remaining in soil on the Property via dermal absorption, inhalation and ingestion in the area of the restricted use zone (RUZ) and (2) restrict the use of groundwater on the Property.

A Uniform Environmental Covenant (UEC) has been recorded as an institutional control as required to meet the approved Type 5 RRS in accordance with VRP requirements. Based on the UEC, the Property is subject to the following activity and/or use limitations:

- A. The Property shall be used only as non-residential property as defined in Rule 391-3-19-.02(2). Use of the Property as residential property, as defined in Rule 391-3-10-.02(2), is prohibited.
- B. The use or extraction of groundwater beneath the Property for drinking water or for any other non-remedial purpose is prohibited.
- C. This Monitoring and Maintenance Plan (as may be amended from time to time with EPD's written approval) ensures that annual inspections are performed to verify the use of the Property continues to be only for non-residential purposes, to document the integrity and conditions of the engineered controls, and to ensure that any breaches of such engineered controls are fully restored following any utility/construction work or other activities. The official records for this Property, including the current version of the approved Monitoring and Maintenance Plan, will be maintained at the EPD office listed above and stored on the Property premises.
- D. In the area of the RUZ, an impervious cap or structure must be in place at all times, unless otherwise approved by EPD. A RUZ for soil shall apply to the area outlined in Exhibit B1. The RUZ activity and use limitations apply to all soil within the RUZ that is beneath the

warehouse floor slab at an approximate depth of 2 feet below land surface or greater. Any intrusive construction activities within the RUZ will require a worker health and safety plan and a contaminated soil/debris management plan. These plans will be provided to EPD prior to initiating the construction work. Soil removal from the RUZ is prohibited, except that soil may be transported to an appropriately permitted waste disposal facility with prior facility notification of soil conditions and prior acceptance by the facility. The integrity of the warehouse concrete slab within the RUZ will be maintained in its current condition or better to prevent occupants from contacting sub-slab materials and to minimize the potential for sub-slab vapors to enter the warehouse.

- E. Vapor-forming regulated substances, including, trichloroethene and tetrachloroethene, are present in the subsurface of the Property. Prior to any demolition or reconstruction activities, the vapor intrusion exposure pathway will be reevaluated. A report of the vapor intrusion exposure pathway evaluation will be submitted to EPD for review and comment at least thirty (30) days prior to any planned disturbance of the existing RUZ cap. The report will be prepared by a Georgia registered professional engineer or a Georgia registered professional geologist who has experience in responsible charge of the investigation and remediation of releases of regulated substances. If warranted for any reconstruction or utility repair/installation plans, a vapor intrusion mitigation system (e.g., vapor barrier, sub-slab depressurization system, etc.) will be designed and installed in the proposed building. Any EPD comments regarding the vapor intrusion exposure pathway evaluation or the design and implementation of a vapor intrusion mitigation system will be addressed to EPD's satisfaction.
- F. Activities on the Property that may interfere with the remedy required by corrective action are prohibited.

The purpose of this Monitoring and Maintenance Plan (M&M Plan) is to establish routine continuing care of the engineered control in the RUZ at the Property to ensure that future Property use will maintain incomplete exposure pathways for soil.

2.0 ENGINEERED CONTROLS

The engineered control implemented at the Property was designed to prevent or control exposure to impacted soils underlying the warehouse, which is identified in the UEC as the RUZ. The location and dimensions of the RUZ were established by sampling and testing of soils beneath the building slab as documented in the CSR Addendum. Four of ten soil samples collected were not in compliance with the non-residential risk reduction standard (RRS) for trichloroethene or tetrachloroethene. The other six soil samples were off-sets used to define the limits of the RUZ.

The warehouse floor is an 8-inch thick concrete slab in good condition, which constitutes a surface barrier (Cap) that adequately prevents leaching of VOCs in the underlying soil and direct exposure of occupants to impacted soil. The warehouse is in constant use, with material storage moved in and out of the RUZ. The Cap is required in the area of the RUZ only. Figure 3 in Appendix B depicts the area of the building slab that is subject to the engineered control (consistent with the RUZ boundaries detailed in the UEC Exhibit B1). The dimensions of the RUZ and its location relative to the building walls is shown.

In order to establish a reproducible means to locate the RUZ shown on Figure 3 that is independent of the presence of the building, a licensed surveyor established two corners of the RUZ using surveyed boundary points. The survey is presented as Figure 4 which includes a property description.

3.0 CONTINUING CARE REQUIREMENTS

This section 3.0 applies to the RUZ only. The portion of the warehouse slab that forms the Cap is subject to continuing care, to include inspection and maintenance.

Activities and uses of the Property must not damage or disturb the integrity of the Cap. Damage is defined as cracks in the concrete slab larger than 1/2" wide.

The Cap may be penetrated in order to perform work necessary to install improvements and to maintain or repair the floor slab. Cap disturbing activities must be performed in a manner to minimize the release of, or exposure to, the regulated substances beneath the Cap in accordance with this M&M Plan.

If impacted soil is excavated from beneath the Cap, the removed soil will be properly handled and disposed off-site in accordance with all applicable local, state and federal rules and regulations. Intrusive activities must be performed by personnel with proper training and knowledge of the conditions underlying the Cap. Repair and/or restoration of the Cap is necessary.

Inspection and maintenance of the Cap must be performed by person(s) experienced in the inspection and maintenance of the engineered control as it relates to the requirements set forth in this M&M Plan. An Evaluation Form, located in Appendix C, must be completed during each annual inspection by the inspector. Completed original forms must be kept on the premises in the tenant's office or electronically.

Property Owner is to be informed by the inspector of deficiencies recorded during the annual inspection. Corrective actions must be taken by the Property Owner to restore the capped area to its pre-existing condition (the condition prior to the deficiency) or an equivalent level of protection

Deficient cap conditions must be corrected within 60 days. Once complete, a record of the corrective actions must be recorded on the Evaluation Form and stored on the premises or electronically.

4.0 SCHEDULED WORK

This section 4.0 applies to the RUZ only. For scheduled activities that disturb, rupture, or negatively affect the Cap, Property Owner is responsible to verify that proper function is restored. Property Owner must ensure workers follow the procedures in this M&M Plan.

Corrective action to repair deficiencies must be completed within 60 days or in accordance with an expanded schedule provided to EPD in writing based on the nature of the repairs.

Scheduled work may include, but is not necessarily limited to, utility installations or repairs and additional construction. The approved M&M Plan will be amended if significant, intentional improvements to the Property are made that affect the Cap, such as removal, modification, or addition to the warehouse building.

Before scheduled work is performed that has the potential to disturb soils below the building slab within the RUZ, Property Owner must provide the utility workers a copy of this M&M Plan and ensure that they follow the procedures herein.

Each contractor is required to prepare its own separate site-specific Health and Safety Plan prepared by a qualified professional. Any intrusive activities that will cause workers to come in contact with the VOCs in soil beneath the slab must be performed by personnel with appropriate training per OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) Standard 29 CFR 1910.120.

If worker activities disturb the integrity of the RUZ Cap, Property Owner is responsible to ensure the engineered control is properly restored and functioning as designed, in accordance with the requirements of this M&M Plan.

Unscheduled utility repairs that can't wait (e.g., natural gas leaks, sewage backups, etc.) shall comply with the following additional work procedures.

- If the Cap overlying the RUZ is accidentally breached, then repairs shall be made expeditiously.
- The breach and follow-up repairs shall be documented on the Incident Form, located in Appendix C, and included with the annual report submitted by the Property Owner.

Any soil generated by excavation work that is planned for off-site disposal will be tested for the regulated substances suspected at the Property and, if affected with concentrations exceeding a residential RRS, will be disposed of at an approved offsite landfill or disposal site in accordance with applicable local, state and federal rules and regulations governing disposal of such material.

5.0 ANNUAL INSPECTION AND CERTIFICATION

Property Owner is responsible to ensure annual inspections are conducted by a person who is familiar with the design and intent of the engineered control on the RUZ and the requirements of this M&M Plan. Property Owner is responsible for reviewing the completed Engineered Control Evaluation Form and Incident Reports and obtaining information and feedback from the inspector regarding their observations.

Property Owner will create a file for storage of records on the premises, or store such records electronically, for a minimum of three years. These records will include a copy of the most recent EPD-approved M&M Plan, completed inspections and associated corrective action documentation.

The Annual Inspection and Certification Report must confirm the following during the previous twelve months:

- The Cap covering the RUZ continues to remain secure and intact;
- The Property use is non-residential only; and
- There continues to be no use or extraction of groundwater beneath the Property for drinking water or for any other non-remedial purpose.

The first annual inspection will be performed within 90 days of approval of this M&M Plan by Georgia EPD. An Annual Inspection and Certification Report (the "Report") will be submitted to the Georgia EPD's Voluntary Remediation Program within 30 days of the inspection.

Subsequent annual inspections will be performed by June 1st of the year following the previous inspection with the Report submitted within 30 days of the inspection.

The Report will include copies of the inspector's completed Engineered Control Evaluation Form and, if appropriate, an Incident Form for the year and a transmittal letter containing approved compliance and certification language signed by the Property Owner (or by its designated representative). The Report will identify any breaches of the engineered control that were repaired since the previous inspection and, if warranted, the schedule for restoration of any breaches that need maintenance or repair.

The Property Owner is responsible to ensure the Report has been received by Georgia EPD.

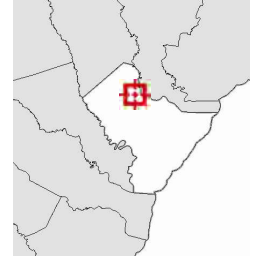
APPENDIX A
TAX MAP



Chatham County, GA



Overview



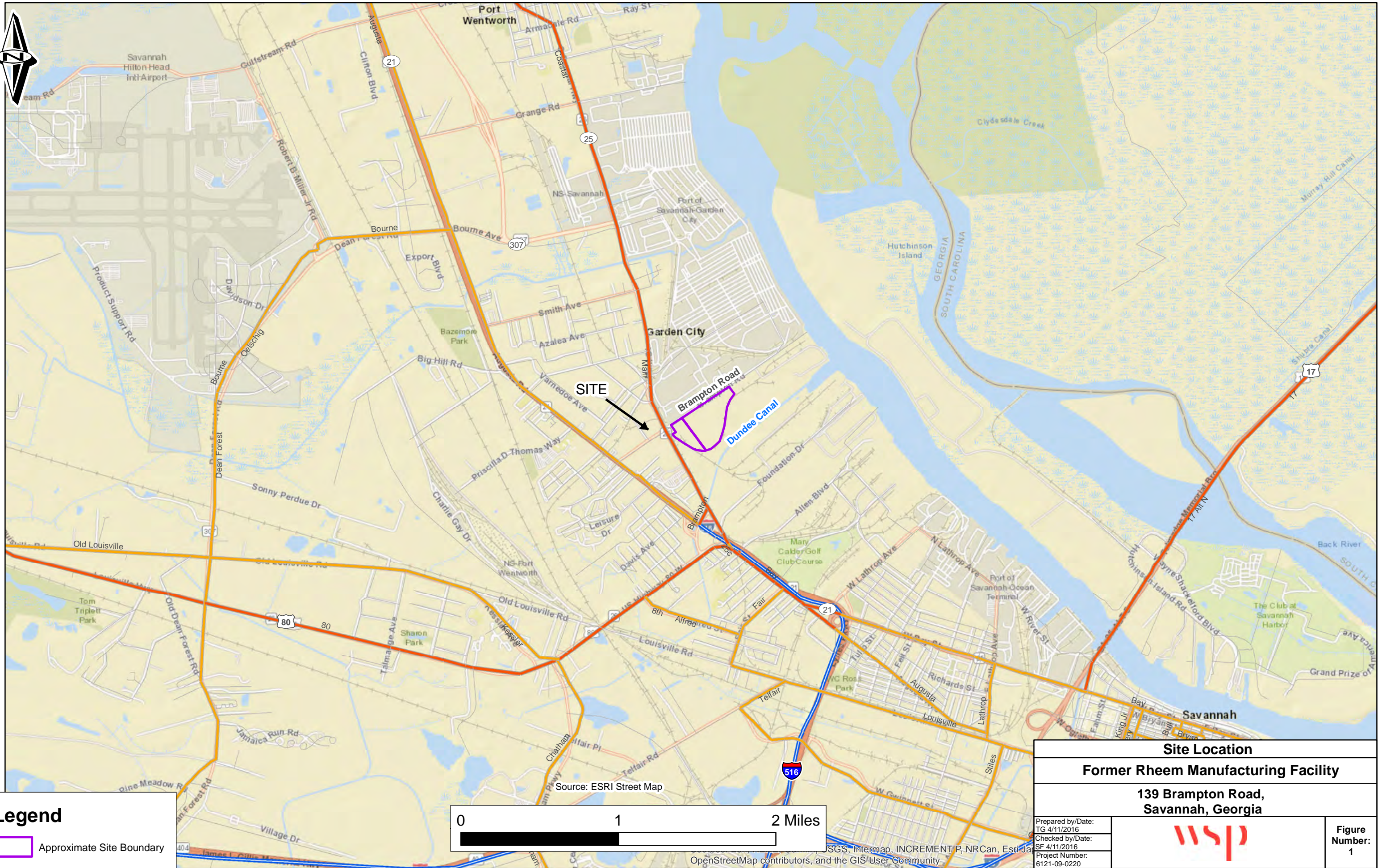
Legend

- Parcels
- Water

Parcel ID	10720 01002	Alternate ID	2919278	Owner Address	EKG LLC
Sec/Twp/Rng	0--	Class	I4 - Industrial Small Tracts		1313 BRIGHTWOOD DR
Property Address	139 BRAMPTON RD SAVANNAH	Acreage	11.1		SAVANNAH, GA 31406
District	(010) UNINCORPORATED				
Brief Tax Description	PT OF FOUNDATION TCT				
	<i>(Note: Not to be used on legal documents)</i>				


Date created: 2/23/2022
Last Data Uploaded: 2/23/2022 6:30:00 AM

APPENDIX B
FIGURES

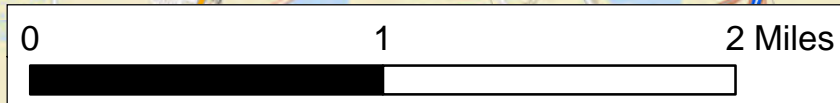


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Legend

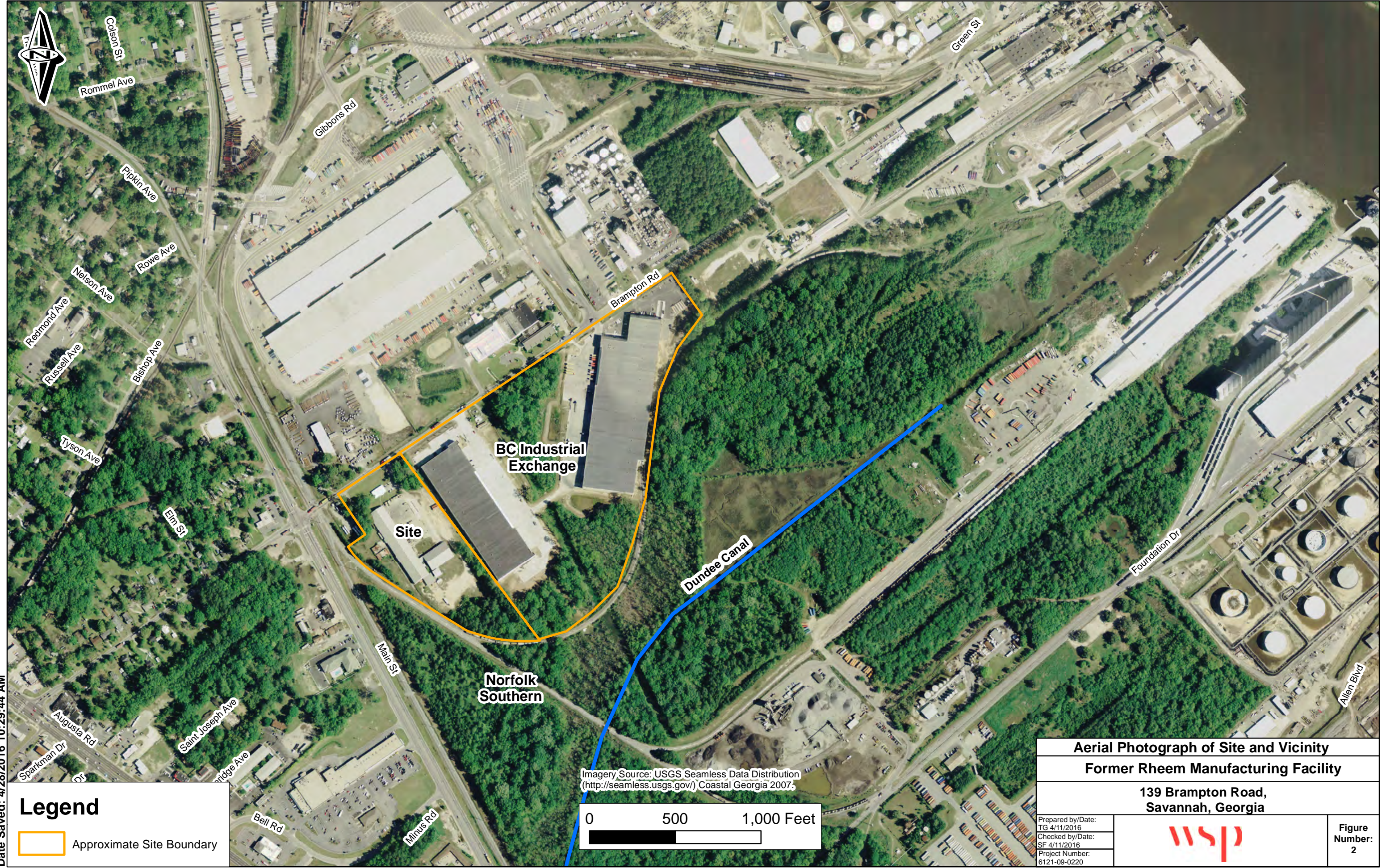
 Approximate Site Boundary

Source: ESRI Street Map



Site Location	
Former Rheem Manufacturing Facility	
139 Brampton Road, Savannah, Georgia	
Prepared by/Date: TG 4/11/2016	
Checked by/Date: SF 4/11/2016	
Project Number: 6121-09-0220	
Figure Number: 1	

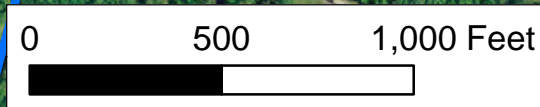
OpenStreetMap contributors, and the GIS User Community



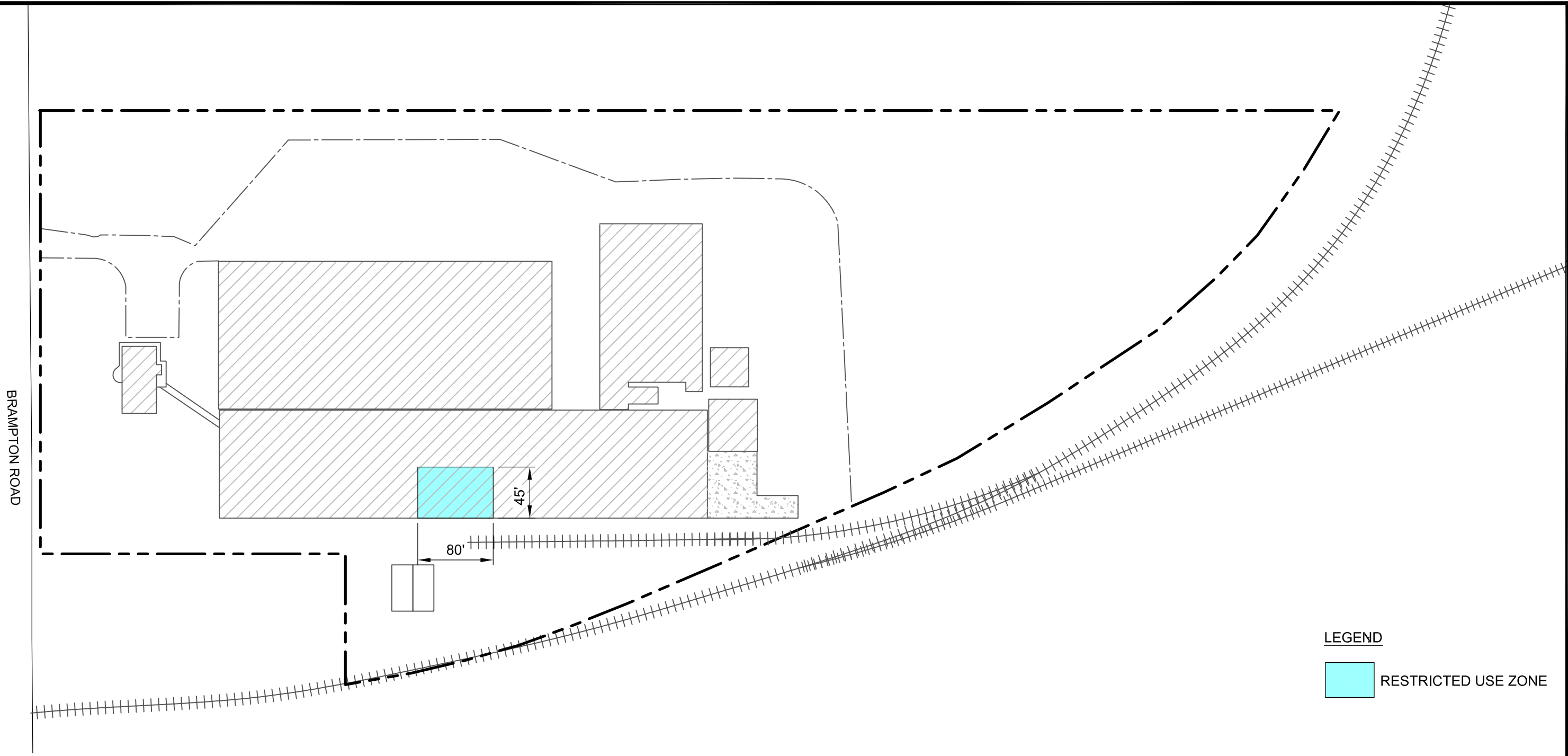
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Date Saved: 4/28/2016 10:29:44 AM

Legend
Approximate Site Boundary

Imagery Source: USGS Seamless Data Distribution
(<http://seamless.usgs.gov/>) Coastal Georgia 2007.



Aerial Photograph of Site and Vicinity			Figure Number: 2
Former Rheem Manufacturing Facility			
139 Brampton Road, Savannah, Georgia			
Prepared by/Date: TG 4/11/2016	Checked by/Date: SF 4/11/2016		
Project Number: 6121-09-0220			



LEGEND

 RESTRICTED USE ZONE



0 100' 200'

SCALE: 1"=100'



Environment & Infrastructure Solutions, Inc.
 2677 BUFORD HWY
 ATLANTA, GEORGIA 30324
 (404) 873-4761

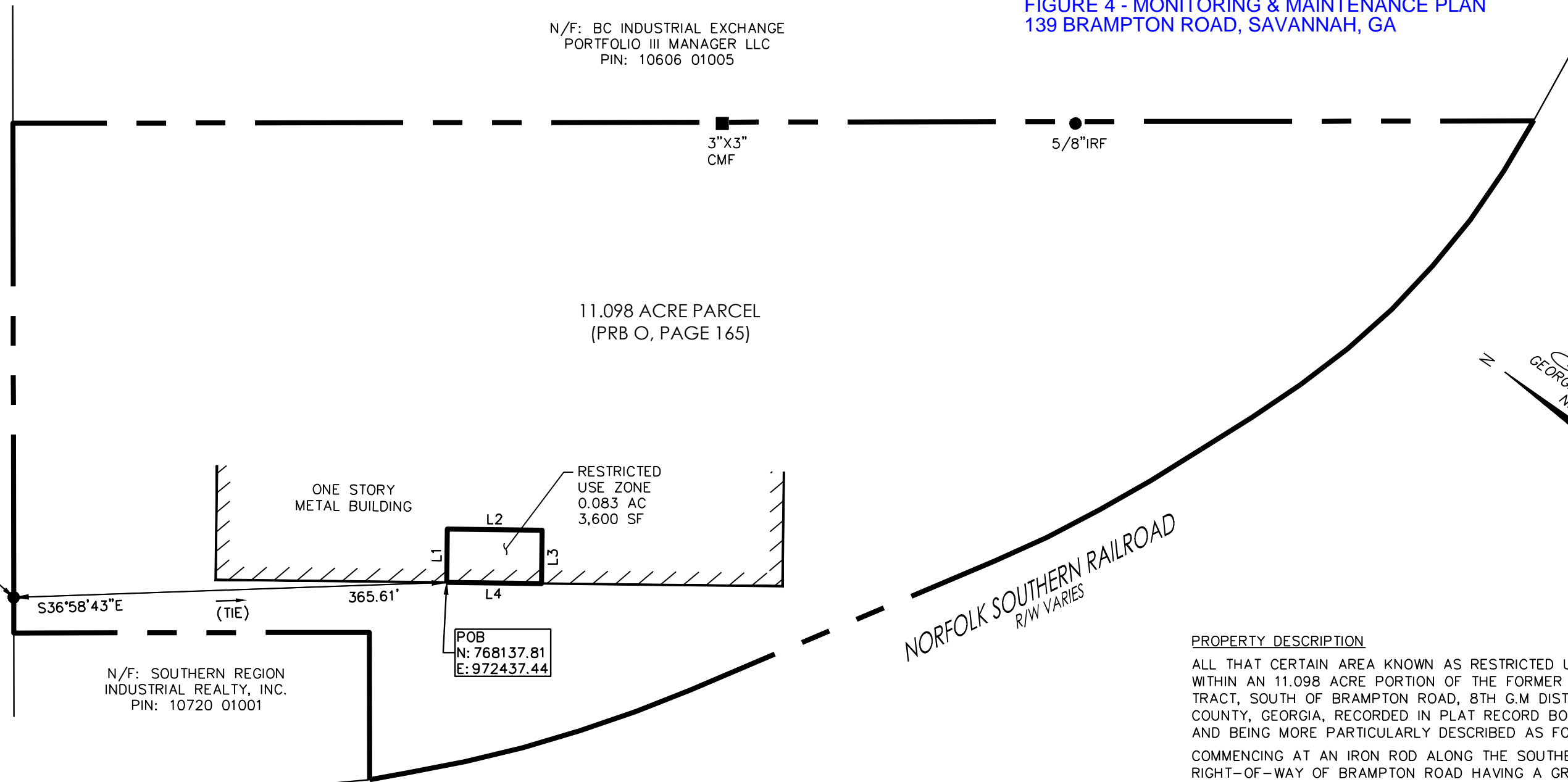
**FORMER RHEEM
 MANUFACTURING FACILITY
 SAVANNAH, GEORGIA**

RESTRICTED USE ZONE

<i>Job Number</i> 6121-09-0220	<i>Task</i> 14	<i>Date</i> FEB 2022	<i>Scale</i> AS SHOWN	<i>Drawn By</i> CB	<i>Reviewed By</i> SF	<i>Figure</i> 3
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FIGURE 4 - MONITORING & MAINTENANCE PLAN
139 BRAMPTON ROAD, SAVANNAH, GA

N/F: BC INDUSTRIAL EXCHANGE
PORTFOLIO III MANAGER LLC
PIN: 10606 01005



PROPERTY DESCRIPTION

ALL THAT CERTAIN AREA KNOWN AS RESTRICTED USE ZONE, LOCATED WITHIN AN 11.098 ACRE PORTION OF THE FORMER FOUNDATION TRACT, SOUTH OF BRAMPTON ROAD, 8TH G.M. DISTRICT, CHATHAM COUNTY, GEORGIA, RECORDED IN PLAT RECORD BOOK O, PAGE 165 AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT AN IRON ROD ALONG THE SOUTHERN RIGHT-OF-WAY OF BRAMPTON ROAD HAVING A GRID NORTH, GEORGIA STATE PLANE, EAST ZONE, NAD 83 COORDINATE OF NORTH: 768,429.88 AND EAST: 972,217.52, THENCE ALONG A SURVEY TIE LINE THROUGH THE 11.098 ACRE PARCEL, S36°58'43"E A DISTANCE OF 365.61' TO A POINT BEING THE POINT OF BEGINNING HAVING A GRID NORTH, GEORGIA STATE PLANE, EAST ZONE, NAD 83 COORDINATE OF NORTH: 768,137.81 AND EAST: 972,437.44; THENCE CONTINUING THROUGH THE 11.098 ACRE PARCEL THE FOLLOWING COURSES AND DISTANCES; N55°38'41"E A DISTANCE OF 45.00' TO A POINT, S34°21'19"E A DISTANCE OF 80.00' TO A POINT, S55°38'41"W A DISTANCE OF 45.00' TO A POINT, N34°21'19"W A DISTANCE OF 80.00' TO THE POINT OF BEGINNING, AND CONTAINING 0.083 ACRE OR 3,600 SQUARE FEET.

NOTES:

1. THIS PROPERTY BOUNDARY IS A COMPILATION OF PLATS DRAWN BY OTHERS AND IS NOT THE PRODUCT OF A COMPLETE BOUNDARY SURVEY PERFORMED BY COLEMAN COMPANY, INC.
2. ADDITIONAL IMPROVEMENTS EXIST, BUT ARE NOT SHOWN.

REFERENCE:

1. PLAT RECORD BOOK O, PAGE 165.
2. SUBDIVISION MAP BOOK 30S, PAGE 82.



LINE TABLE		
LINE #	LENGTH	DIRECTION
L1	45.00'	N55°38'41"E
L2	80.00'	S34°21'19"E
L3	45.00'	S55°38'41"W
L4	80.00'	N34°21'19"W

LEGEND

- IRF IRON ROD FOUND
- CMF CONCRETE MONUMENT FOUND
- POC POINT OF COMMENCEMENT
- POB POINT OF BEGINNING

COLEMAN COMPANY, INC • 1480 CHATHAM PARKWAY, SUITE 100 • SAVANNAH, GEORGIA (912) 200-3041

SHEET#:	JOB NUMBER: 22-669
1/1	DATE: 9/28/2022
	DRAWN BY: JPA
	CHECKED BY: JPA
	SCALE: 1"=100'

A EXHIBIT OF A RESTRICTED USE ZONE,
LOCATED WITHIN AN 11.098 ACRE PORTION OF THE FORMER FOUNDATION TRACT,
SOUTH OF BRAMPTON ROAD, 8TH G.M. DISTRICT,
CHATHAM COUNTY, GEORGIA
PREPARED FOR: EKG, LLC



DATE PLOTTED: 9/28/2022 11:27 AM BY: Josh Atkins DRAWING PATH: Q:\2022\22-669\000\DWG\Survey\22-669_2022.9.28_BRAMPTON RD RESTRICTED USE ZONE EXHIBIT.dwg

APPENDIX C
INSPECTION TEMPLATES

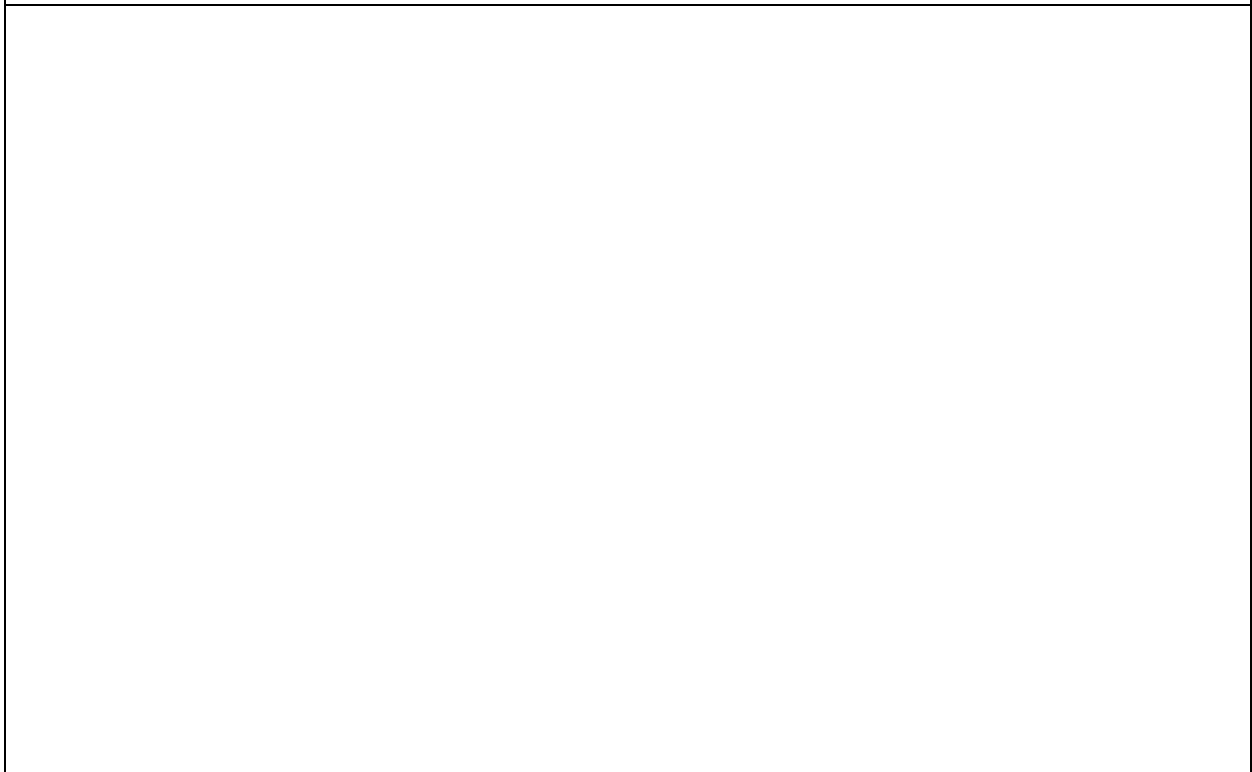
139 Brampton Road Savannah, Georgia Engineered Controls Evaluation Form							
INSPECTION ITEM	Yes	No	NA	MN	IA	LOCATION/DESCRIPTION	CORRECTIVE ACTION
FLOOR SLAB OBSERVATIONS							
Slab Crack							
Slab Penetrations							
Other Damage							
Action Taken							
GENERAL SITE ACTIVITIES							
All water used on site is from an off-site source							
Construction activities in or around RUZ since last inspection							
Construction activities adhered to worker health and safety plan							
Soil removal in or around RUZ since last inspection							
Soil removal utilized appropriate management practices, (attach photographs)							
PLANNED WORK							
Slab Disturbed							
Action Taken							
OTHER OBSERVATIONS/GENERAL INSPECTION NOTES (Attach Photographs if appropriate)							
DATE OF INSPECTION							INSPECTOR
NA – No Action Needed MN – Maintenance Needed IA – Immediate Attention Needed Modify form to add inspection as needed							(Print Name)
							(Signature)

* This *Engineered Controls Evaluation Form* shall be completed each year during each annual inspection, as required by Section 3.0 (Continue Care Requirements) of the Monitoring and Maintenance Plan.

PHOTO LOG



Photograph 1 -

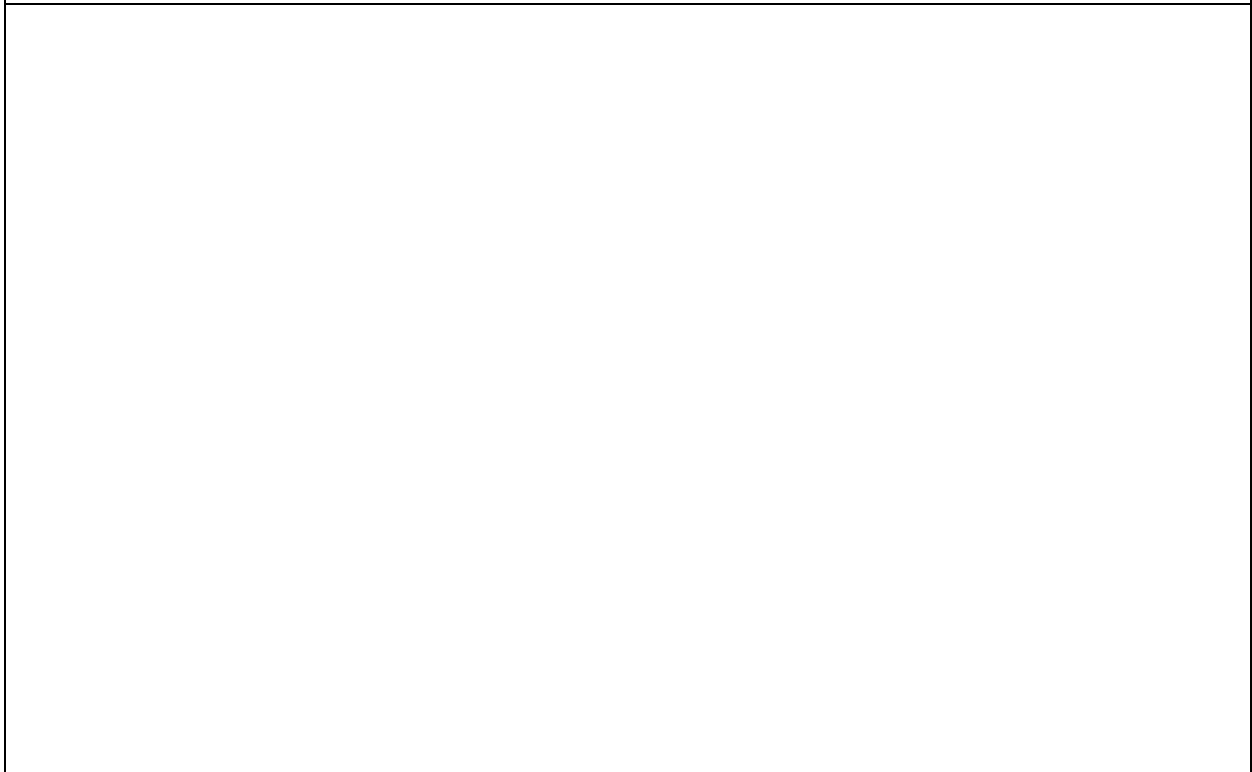


Photograph 2 -

Date of Photographs:



Photograph 3 -



Photograph 4 -

Date of Photographs:

**139 Brampton Road Site
 Savannah, Georgia
 Incident Report**

NON-COMPLIANT CONDITION	ACTION PLANNED		ACTION TAKEN			DESCRIBE CONDITION (Indicate Location)
	Yes	No	INV	RRR	TBD	
DATE OF INSPECTION					INSPECTOR	
INV – Investigate RRR- Repair, Replace, Restore TBD – To Be Determined						(Print Name)
						(Signature)

* This *Incident Report* form shall be used to document any breach and follow-up repairs of the Cap (which is located in the Restricted Use Zone (RUZ)), as required by Section 4.0 (Scheduled Work) of the Monitoring and Maintenance Plan.

PHOTO LOG

Photograph 1 -

PHOTO LOG

Photograph 2 -

APPENDIX D
TRANSMITTAL LETTER TEMPLATE
FOR ANNUAL INSPECTIONS

Transmittal Letter for the "Annual Inspection and Certification Report"

[Date]

Georgia Department of Natural Resources
EPD – Land Protection Branch, Brownfield Program
2 Martin Luther King, Jr. Drive, SE, Suite 1056, East Tower
Atlanta, Georgia 30334

**Subject: Annual Inspection and Certification Report
139 Brampton Road (Former Rheem Manufacturing)
Savannah, Chatham County, Georgia**

This document, with attachments, serves as the Annual Inspection and Certification Report for 139 Brampton Road, Savannah, Chatham County, Georgia (the "Property").

The Property is in compliance as follows:

- The portion of the warehouse slab that constitutes the Cap continues to remain secure and intact.
- There continues to be no use or extraction of groundwater beneath the Property for drinking water or for any other non-remedial purpose.
- The site use remains non-residential.

Owner Certification

I certify that this report meets the requirements set forth in the Monitoring and Maintenance Plan for the Property. I further certify under the 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 Property, 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 fines and imprisonment for knowing violations.

(Property Owner/Representative Signature) (Print Name)