

MONITORING AND MAINTENANCE PLAN, REVISION 1

Former Encore Dry Cleaners

Cobb County Tax Parcels
16082900470 & 16082900480

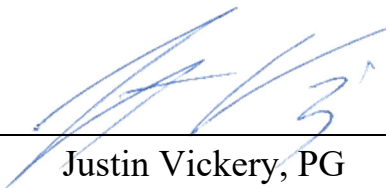
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1 INTRODUCTION

Trammco Environmental Solutions (Trammco) is pleased to submit this Monitoring and Maintenance Plan, Revision 1 on behalf of Alterman Real Estate, Ltd. (Alterman) for Cobb County Tax Parcel IDs 16082900470 (formerly Tracts #2 and #3 of Tax Parcel 16089900010) and 16082900480 (formerly Tract #1B of Tax Parcel 16089900010). In November 2013, a Monitoring and Maintenance (M&M) Plan was submitted for Cobb County Tax Parcel ID 16082900470 to specify inspection and maintenance requirements for Type 5 Risk Reduction Standard (RRS) compliance. Since that time, a portion of the adjacent parcel (Tax Parcel 16089900010) has been transferred to Alterman. That portion was formerly known as Tract #1B of Tax Parcel 16089900010 and is currently Tax Parcel 16082900480. The property subjected to the M&M Plan, herein referred to as “the Property,” includes Tax Parcels 16082900470 and 16082900480. Figure 1 (all figures are included in the Attachment A) is a Site Location Map.

The Property has been remediated using engineering controls (asphalt cap) and institutional controls. Institutional controls include an environmental covenant, which establishes land use and groundwater use restrictions.

This M&M Plan, Revision 1 has been completed to incorporate the additional parcel and the newly established Property marker locations and supersedes the November 2013 M&M Plan. Furthermore, the monitoring well inspection requirement from the November 2013 M&M Plan has been removed since groundwater monitoring is no longer required, and the monitoring wells have been decommissioned.

2 ENGINEERING CONTROLS

2.1 Asphalt Cap

The asphalt cap consists of a four-inch layer of asphalt (2½-inch base coat and 1½-inch top coat) laid on top of a 6-inch bed of crusher run and is interspersed with concrete pads (dumpster pad, transformer pad, etc.). The sloping of the cap is designed to encourage runoff through a storm drainage system and to minimize pooling of precipitation. The cap covers a portion of Tax Parcel 16082900470 (formerly Tract #3 of Tax Parcel 16089900010), as shown on Figure 2. The cap was designed to cover soils that exceed the Type 4 RRSs to 1) minimize precipitation infiltration into these soils and 2) minimize human exposure to these soils. Soils in the upper 10 feet of the soil column beneath the cap do not exceed the Type 4 RRSs, and therefore, the direct human contact health risk is only associated with soils deeper than 10 feet. There is, however, a potential for soil vapor exposure within the upper 10 feet of the soil column.

The cap may be penetrated in order to perform work necessary to implement corrective action; perform additional remediation; install, maintain, repair or replace utilities, structures and engineering controls; or for any other reason approved by EPD. All such 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.

2.2 Property Markers

The Property markers serve as notice to anyone working on the Property that it is subject to an environmental covenant and that inquiries should be made before conducting any land disturbing activity. The precise wording stated on the markers is shown in Appendix B. Granite markers were previously placed around the perimeter of Tax Parcel 16082900470. With the September 28, 2017 recording of the Modification of Environmental Covenant to incorporate Tax Parcel 16082900480 into the Property, the modified marker locations include one at each driving entrance to the Property, as shown on Figure 2.

3 INSPECTION AND MAINTENANCE

3.1 Overview

This section of the M&M plan describes the procedures required to inspect and maintain the engineering controls. Inspections must be performed by personnel who understand the design criteria of the asphalt cap, are familiar with how the cap was constructed, and are familiar with the ongoing maintenance of the cap. Inspections and maintenance oversight must be performed by a Georgia-certified Professional Engineer or Professional Geologist.

3.2 Asphalt Cap

The purpose of the cap is to minimize precipitation infiltration and to minimize human contact with the underlying soils. The cap must therefore be inspected annually to ensure 1) that positive drainage is maintained in order to prevent ponding and 2) that the integrity is maintained to prevent the formation of cracks extending through its entire depth, potentially leading to surface water intrusion into the underlying soils. Conditions related to #2 above would be considered Major Damage.

Regular use of the Property must not damage the integrity of the cap. When intrusive activities are required, excavated impacted soil should be managed in accordance with all applicable local, state, and federal rules and regulations governing the management of such material. Intrusive activities must be performed by personnel with appropriate HAZWOPER training in accordance with OSHA's Hazardous Waste Operations and Emergency Response Standard 29 CFR 1910.120 and a Health and Safety Plan prepared by a qualified safety professional. Contaminated excavated soil should not be placed back into the excavation but should be properly characterized for disposal and disposed of at an appropriate disposal facility. Soil from the top 10 feet below the ground surface ("surficial soil") may be reused if segregated from the deeper contaminated soil. The excavation should be backfilled with clean surficial soil or fill material and recapped with an impervious surface. Recapping of the area of excavation would not be necessary if all the impacted soil exceeding RRSs is removed down to the water table.

3.3 Property Markers

The granite markers should be inspected annually to ensure that the structural integrity and legibility is maintained. Minor cracks should be filled to prevent enlargement. The following would be considered Major Damage:

- crushed, broken, or defaced markers, which either are illegible or allow a significant amount of precipitation infiltration;

- damage in the surrounding asphalt or concrete pad such that the marker can be removed; and
- removed or missing markers.

3.4 M&M Documentation

The results of the inspection must be recorded on the M&M Inspection Log, included in Appendix C. Any maintenance of the cap must be documented on a Maintenance Record Form. If Major Damage is observed, repairs must be completed within sixty (60) days of discovery. All other items requiring repair must be completed within ninety (90) days of discovery. Repairs must be made in accordance with good engineering practices and must be conducted by qualified personnel.

Inspection logs include the date of the inspection, name of the inspector(s), component inspected, weather conditions, condition of the item inspected, and a description of any damages requiring attention and whether that damage would be considered Major Damage, as that term is defined in Sections 3.2 and 3.3. Maintenance records include the dates repairs are initiated and completed and the name of the person recording the information. Comments describing the severity of the damage must also be noted on the maintenance record along with a description of the repairs.

4 PLANNED USES OF PROPERTY

Any use of the Property must preserve the integrity and effectiveness of the cap. The Property shall only be used for non-residential purposes on the ground floor with residential use restricted to upper floors, unless a change is approved by the EPD. An annual inspection must be conducted to verify the use of the Property.

- The inspection must verify the use of the Property by owners, tenants, and other occupants is consistent with non-residential use on the ground floor.
- All lease agreements and other agreements concerning the use of the Property, including contracts and informal agreements, must be reviewed to ensure they are consistent with the non-residential use on the ground floor.

The results of the inspection must be documented on the Land-Use Certification Form in Appendix C. Any future changes in use of the Property that materially impact the engineering controls must be approved by the EPD in accordance with Paragraph 2 of the Environmental Covenant.

5 ANNUAL REPORT AND CERTIFICATION

The annual inspection and maintenance must be documented in a report, which must be submitted to the Georgia EPD Response and Remediation Program annually by October 15. The report should include the M&M Inspection Log, the Maintenance Record Form (even if no maintenance was performed), and the Land Use Certification Form, and it must confirm that the use of the Property has not changed and that the cap remains intact. If during the annual period, activities cause penetration or breaching of the asphalt cap, or if significant maintenance or repair activities have been performed, the annual report shall also include a brief summary of such activities.

The report must contain the name of the person EPD should contact regarding the Property inspection, as well as the mailing address, telephone number, and email of that person, and must include the following certification:

I certify that this document and all attachments were prepared under my direction and supervision to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who are 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 to a State agency.

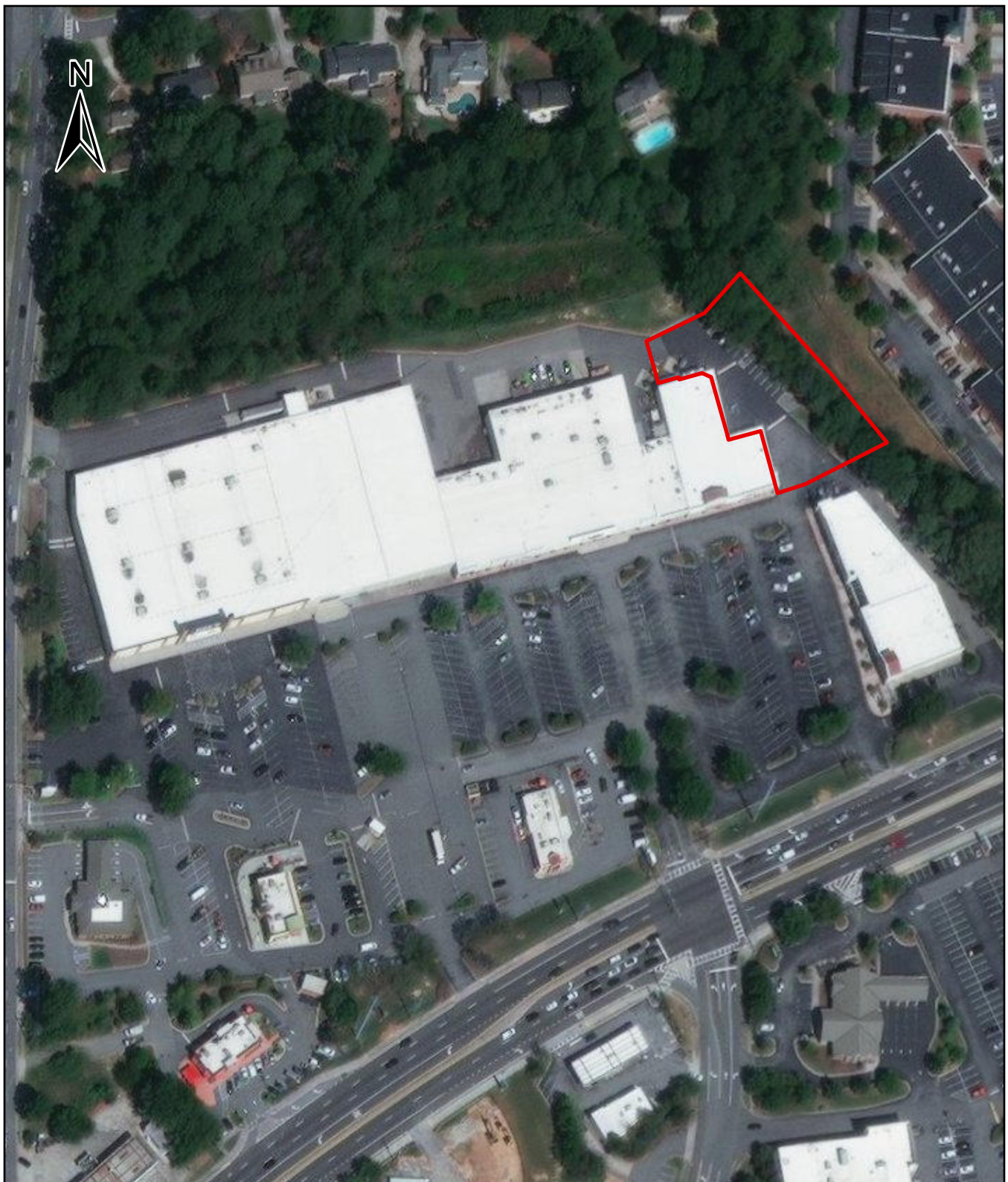
Signature

Date

Printed Name and Official Title

APPENDIX A

Figures



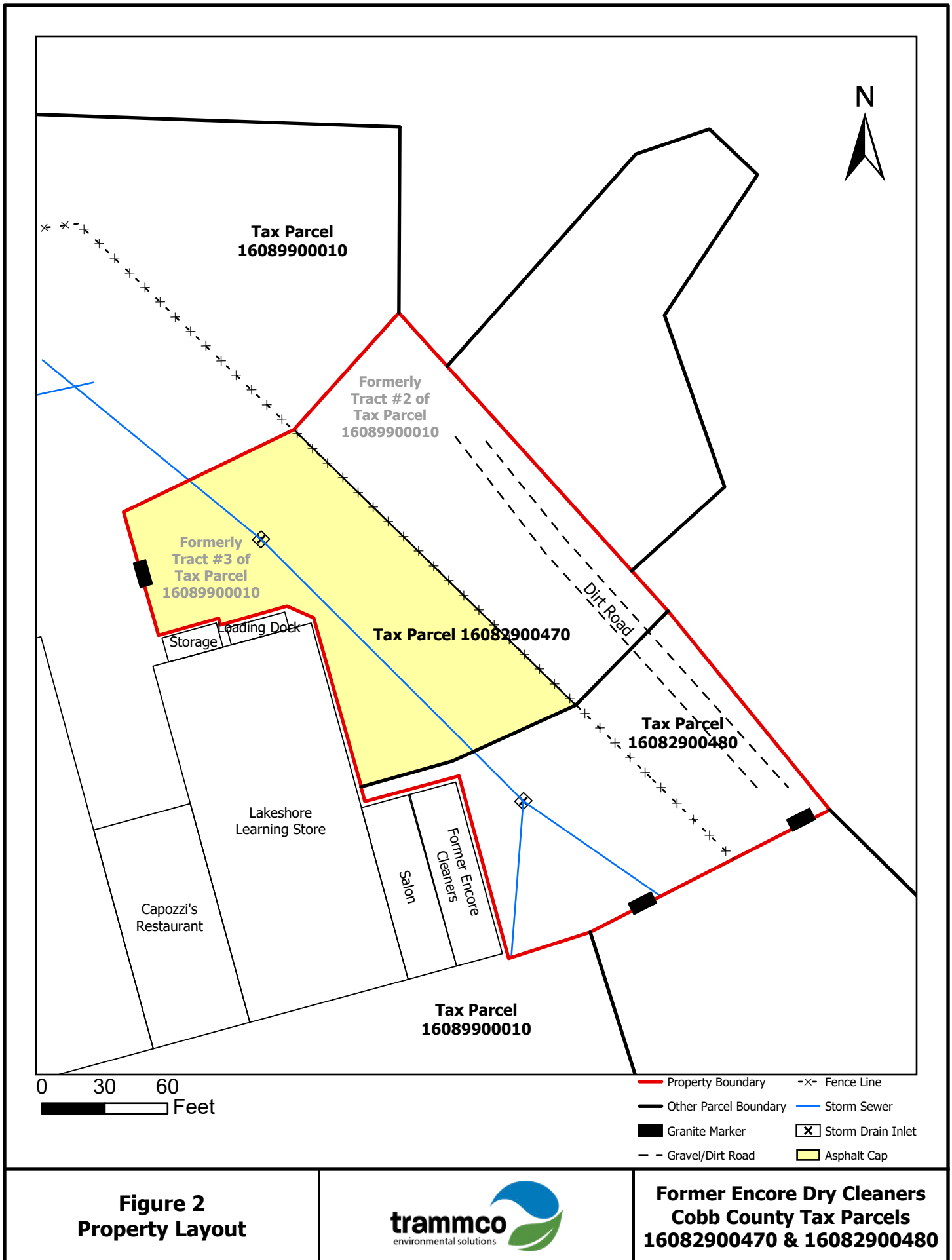
0 100 200
Feet

— Property Boundary

Figure 1
Site Location Map



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APPENDIX B

Property Marker Statement

RESTRICTED AREA

**SUBJECT TO
ENVIRONMENTAL
COVENANT**

**CALL THE PROPERTY
OWNER OR THE GEORGIA
ENVIRONMENTAL
PROTECTION DIVISION
PRIOR TO DIGGING OR
COMMENCEING ANY LAND
DISTURBING ACTIVITY**

APPENDIX C

M&M Forms

M&M INSPECTION LOG

Former Encore Dry Cleaners
Cobb County Tax Parcels 16082900470 and 16082900480

Date: _____

Time: _____

Weather: _____

Inspector(s) _____

Component Inspected	Condition of Component	Check if Major Damage
Asphalt and/or Concrete Cap		<input type="checkbox"/>
Granite Markers		<input type="checkbox"/>

Comments:

This Inspection Log was prepared in accordance with the requirements and obligations in the Monitoring and Maintenance Plan for the Site.

(Name), PE/PG

Signature

Date

MAINTENANCE RECORD FORM

Former Encore Dry Cleaners
Cobb County Tax Parcels 16082900470 and 16082900480

Date: _____

Weather: _____

Inspector(s): _____

Component Inspected	Repair Dates		Inspector	Description of Repairs	Check if Major Damage
	Initiated	Completed			
Asphalt and/or Concrete Cap					<input type="checkbox"/>
Granite Markers					<input type="checkbox"/>

Comments:

This Maintenance Record Form was prepared in accordance with the requirements and obligations in the Monitoring and Maintenance Plan for the Site.

(Name), PE/PG

Signature

Date

LAND-USE CERTIFICATION FORM

Former Encore Dry Cleaners
Cobb County Tax Parcels 16082900470 and 16082900480

TYPE	No.	CRITERIA RESPONSE	YES	NO
Land Use	1	Does this property meet the definition of non-residential property as defined in HSRA Rule 391-3-19.02(2)? “Non-residential property means any property or portion of a property not currently being used for human habitation or for other purposes with a similar potential for human exposure, at which activities have been or are being conducted that can be categorized in one of the 1987 Standard Industrial Classification major group...”	<input type="checkbox"/>	<input type="checkbox"/>
	1a	If no to 1, attach a written explanation to this form.		
Exposure	2	Has excavation, construction, utility installation or maintenance, or similar land disturbing activities been conducted at the site within the last year?	<input type="checkbox"/>	<input type="checkbox"/>
	2a	If yes to 2, was work preformed using appropriate personal protective equipment (PPE)?	<input type="checkbox"/>	<input type="checkbox"/>
	2b	Has groundwater beneath the property been used or extracted for drinking water or any other non-remedial purpose?	<input type="checkbox"/>	<input type="checkbox"/>
	2c	If no to 2a or yes to 2b, attach a written explanation to this form.		
Institutional Controls	3	Do all leases or other property instruments for the site have the applicable deed notice language inserted into them.	<input type="checkbox"/>	<input type="checkbox"/>
	3a	If no to 3, attach a written explanation to this form.		
Inspection	4	Date of Inspection and Name of Inspector:		
	4a	Photographs showing current land use (attached)	<input type="checkbox"/>	<input type="checkbox"/>

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

SIGNATURE

DATE