



UNITED
CONSULTING

REPORT

**For Environmental
Protection Division**

Monitoring and Maintenance Plan
Adair Park (formerly ESB, Inc.)
1246 Allene Avenue Southwest
Atlanta, Fulton County, Georgia



December 20, 2024

Ms. Shannon Ridley
Brownfields Unit Coordinator
Land Protection Branch
Environmental Protection Division
Floyd Towers East, Suite 1054
2 Martin Luther King, Jr. Drive SE
Atlanta, Georgia 30334

RE: Monitoring and Maintenance Plan – EPD DRAFT 3
Adair Park (formerly ESB, Inc.)
1246 Allene Avenue Southwest
Atlanta, Fulton County, Georgia
Project No. 20-GA-04481-04


Dear Ms. Ridley:

On behalf of **1246 Allene Owner, LLP**, United Consulting is submitting this Monitoring and Maintenance Plan (MMP) for the above referenced property (Subject Property). The Subject Property is in compliance with Type 5 Risk Reduction Standards (RRS) for soil, which includes institutional and engineering controls. As such, the institutional controls include a Uniform Environmental Covenant (UEC) and long-term monitoring through implementation of this MMP. With approval, this MMP will replace the initial January 2020 MMP prepared by Entact and initiate a process of annual reporting.

Please contact Spencer Cox with United Consulting at 770-842-8956, if you have any questions or if we can be of further assistance.

Sincerely,

UNITED CONSULTING



Spencer C. Cox, G.I.T.
Senior Environmental Specialist



Russell C. Griebel, P.G., C.P.G.
Executive Vice President/Chief Consultant

SCC/BWS/sc

SharePoint: AdairPark.MMP.04481-04

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- Figure 3: Type 5 RRS Engineering Controls
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Attachment B Permanent Marker Specifications

Attachment C Inspection Form

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1.0 INTRODUCTION

1.1 Purpose

This Monitoring and Maintenance Plan (MMP) has been developed by United Consulting on behalf of **1246 Allene Owner, LLP** (hereinafter referred to as the Owner) for the Adair Park Development (previously referred to as ESB, Inc.) at 1246 Allene Avenue Southwest in Atlanta, Fulton County, Georgia. The requirements outlined herein are to be applied site-wide at the Subject Property, currently referred to as Fulton County Parcel ID 14-0105-0003-0374. The Owner has redeveloped the Subject Property with a multifamily residential development, the layout and boundaries of the Subject Property are illustrated on Figure 1 in Attachment A.

The purpose of this MMP is to describe the procedures relative to the current and potential future maintenance of engineering controls for the Subject Property and to also ensure that the associated institutional controls as identified in the Uniform Environmental Covenant (UEC) dated May 6, 2021 are being implemented. This plan is being submitted to the Georgia Environmental Protection Division (EPD) Brownfield Program as part of the Prospective Purchaser Compliance Status Report (PPCSR) for the Subject Property. The Owner of the Subject Property is responsible for implementation of this MMP and compliance with the conditions and requirements established herein. If site conditions change, this MMP may be revised to address such conditions, subject to EPD approval.

1.2 Background

The Owner entered the Subject Property into the Georgia Brownfield Program through submittal of a Prospective Purchaser Corrective Action Plan (PPCAP) and a PPCAP Amendment, respectively dated December 6, 2020 and April 8, 2021. The PPCAP and Amendment were subsequently approved by the EPD on January 4, 2021 and August 24, 2021. Based on the impracticability of certification of the Subject Property to residential Type 1 and/or Type 2 Risk Reduction Standards (RRS), the PPCAP proposed certification of compliance for soils with a Type 5 RRS remedy. As noted in the PPCAP, as amended, soil sampling indicated a widespread distribution of soil impacts (with concentrations above residential RRS) across the Subject Property. The PPCAP, as amended, proposed engineering and institutional controls (i.e. Type 5 RRS remedy as shown on Figure 2) across the Subject Property to ensure the protectiveness and support the redevelopment. The Type 5 RRS engineering controls are illustrated on Figure 3 in Attachment A. Notably, the southern portion of the Subject Property has been certified to a non-residential Type 5 RRS (hereinafter referred to as the Non-Accessible Area), which will require permanent perimeter fencing to limit unintended access. The limits of the Non-Accessible Area are illustrated on Figures 2 and 3.

For the residential Type 5 RRS portion (i.e. accessible portions), exposure to impacted soils with concentrations greater than applicable RRS has been addressed through institutional and engineering controls across the Subject Property. The institutional controls include the UEC that is recorded in the Subject Property's chain of title and the long-term monitoring required within this MMP. The UEC documents the implemented engineering controls on the Subject Property, groundwater use restriction, and long-term monitoring requirements.

The engineering controls include an engineered soil barrier and hardscape covers (i.e. concrete foundations/slabs, sidewalks, concrete pavement/pavers) throughout the Subject Property. Engineering control details will be included in the PPCSR and are discussed further below.

2.0 ENGINEERING AND INSTITUTIONAL CONTROLS

Engineering and institutional controls are implemented across the Subject Property to limit the potential exposure between receptors and the underlying impacted soil and/or groundwater media. The following is a discussion of the details and application of these engineering controls and existing conditions (within the Non-Accessible Area), as generally illustrated on Figure 3.

2.1 Engineering Controls

2.1.1 Protective Surface Covers

The Type 5 RRS approach included the implementation of the following engineering controls as site-wide protective surface covers on the Subject Property, notably excluding the Non-Accessible Area. The selection and location of these protective covers were identified and detailed within the PPCAP, as amended, prior to implementation.

Hardscapes

Across the Subject Property accessible areas, protective site development hardscapes (i.e. concrete foundations/slabs including retaining walls and pool foundations, sidewalks, concrete pavement, pavers, asphalt pavement) control exposure to soils not covered by the engineered soil barrier. Figure 3 illustrates the limits of the building foundations, parking lot, and the various hardscapes (e.g. concrete cap) located on the Subject Property.

Engineered Soil Barrier

In the accessible areas of the Subject Property where hardscapes are absent, a softscape layer (i.e. engineered soil barrier/soil cap) was implemented. The engineered soil barrier includes a minimum of 1 foot of environmentally tested clean soil (i.e. meeting residential Type 1/2 RRS) with an underlying demarcation barrier. The location and limits of the residential soil cap is illustrated on Figure 3.

Non-Accessible Area – Existing Conditions

Along the southern perimeter of the Subject Property, there is an approximate 20-foot wide vegetative buffer between the development parking areas and the southern property line which requires permanent fencing to maintain limited and unintended access, referred to as the Non-Accessible Area. This area includes preserved existing healthy vegetation and an increased density of trees and shrubs. The density of plantings is expected to be limited by the existing tree save drip lines and critical root zones that must remain intact. Notably, soils in this portion of the Subject Property are in compliance with approved non-residential Type 4 RRS without needing a demarcation barrier, as approved by EPD. The location and limits of the Non-Accessible Area of the Subject Property are shown in Figures 2 and 3.

2.1.2 Fencing and Signage

Fencing – Non-Accessible Area

Existing and additional fencing has been installed along the southern portion of the Subject Property to limit access to the Non-Accessible Area. Due to the Subject Property's elevations, a retaining wall has been constructed along the north side of this area, varying in height relative to the parking lot of the overall development. Where the retaining wall tapers to grade, additional fencing has been installed to limit access. The fence's location was determined based on sampling data showing that the existing surface soils comply with non-residential RRS and to avoid impacting existing established trees during grading activities. As part of this MMP, the existing fencing and soil conditions associated with the Non-Accessible Area must be maintained.

Permanent Markers

As required under Section 391-3-19-.08 (7) of the HSRA Rules, four permanent markers are installed on the Subject Property, their locations are illustrated in Figure 4. Disturbance or removal of the markers is prohibited.

2.2 Institutional Controls

2.2.1 Groundwater Use

Groundwater use or extraction beneath the property for drinking water is prohibited. Groundwater extraction for environmental evaluation or remedial purposes cannot be completed without written approval by EPD.

2.2.2 Monitoring and Maintenance Plan

As detailed within the PPCSR and UEC, this MMP has been prepared to detail the requirements and procedures which shall be implemented to maintain the existing corrective actions at the Subject Property, further discussed below in Section 4.0.

3.0 LAND USE AND DISTURBANCES

Activities on the Subject Property which may result in exposure to soils impacted with constituents at concentrations greater than residential RRS are prohibited, with the exception of required maintenance, repair, and/or replacement of the engineering controls. Intrusive activities which may disturb the protective surface covers (i.e. engineering controls) on the Subject Property must be conducted in accordance with this MMP. Examples of prohibited intrusive activities include, but are not limited to: 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.

If required, any planned intrusive activities must be evaluated/approved by the Owner before implementation to determine applicable health/safety requirements and the waste management requirements/disposal options. Planned barrier breaches should be documented through a request including the following information: the purpose of the proposed disturbance, description of disturbance activities, dates/duration of disturbance, contact information for the qualified contractor conducting the work, and documentation for excavation monitoring and barrier replacement (if applicable). Following approval by the Owner and execution of the planned work, notification of the disturbance activities will be included as part of the annual reporting package to the EPD, discussed in Section 5.0.

At the time of these disturbance activities, soils must be managed in accordance with this MMP and the maintenance/repair requirements detailed below in Section 4.0 (for softscapes and hardscapes). Generally, any disturbance will require the planned management of soils to mitigate the potential for exposure to and/or release of impacted materials. Materials generated from these disturbances may require additional characterization to support their appropriate off-site disposal, if required.

In the event of an emergency breach and/or disturbance, the Owner is to be notified of the conditions so that appropriate corrective actions can be coordinated, approved, documented, and subsequently reported to the EPD. Emergency contact information is included in Section 5.3. Corrective actions implemented to address such emergency conditions should be conducted in accordance with the same maintenance/repair requirements of this MMP and Section 4.0. Disturbance activities, planned and/or unforeseen, are to be completed by contractors in accordance with Occupational Health and Safety Administration (OSHA) requirements. The Contractor is responsible for meeting all OSHA requirements and documentation, including worker safety.

4.0 MAINTENANCE AND INSPECTION

Items and systems subject to inspection and/or maintenance include:

- Engineering Controls
 - Protective Surface Covers
 - Fencing and Signage
- Institutional Controls
 - Groundwater Use Restriction
 - Activities and Land Use Restriction
 - Monitoring and Maintenance Plan
- Vapor Intrusion Mitigation System
 - System Discharge Pipes

The process to maintain the engineering controls are discussed below. Inspections will be performed at least annually, documented using the Inspection Form provided in Attachment C, and will be reported to the EPD annually.

Inspections should be conducted of the entire Subject Property, by a representative of the Owner and will be familiar with the MMP. Field observations and notes should be included in the Inspection Form included in Attachment C. The inspector will inform the property manager of deficiencies noted during the inspections.

4.1 Protective Surface Covers

The protective surface covers at the Subject Property include hardscapes and the engineered soil barrier. The hardscapes include concrete foundations/slabs including retaining walls and pool foundations, sidewalks, concrete pavement, pavers, and asphalt pavement. The engineered soil barrier (soil cap) includes a minimum of 1 foot of environmentally tested clean soil (i.e meeting residential RRS) with an underlying demarcation barrier. The existing demarcation barrier installed beneath the engineered soil barrier is characterized as an orange, non-woven geotextile material (i.e. TerraTex N04-Orange polypropylene geotextile or similar).

4.1.1 Hardscapes

The various hardscapes on the Subject Property will be maintained to prevent damage, cracks, movement, and/or removal that could lead to impacted soil exposure. Existing hardscapes and their locations are illustrated on Figure 3.

4.1.2 Engineered Soil Barrier

The soil cap will be maintained to prevent damage, removal, and/or erosion due to weather conditions or unintended use. The integrity of the soil cap, including its required minimum 1 foot depth, will be inspected

and documented on the Inspection Form provided included in Attachment C, with observed significant changes noted therein.

Significant damage that exposes the demarcation barrier and/or underlying soil, as well as less significant damage that does not expose impacted soils, will be repaired promptly following discovery. The repairs will be made in accordance with sound engineering practices, and will be conducted by qualified personnel, as applicable. If maintenance of the cover is required, documentation of the activities, including a description of the protective surface cover conditions, the severity of the observed damage, a description of the repairs, the dates that repairs were initiated and completed, and the name of the inspector, will be included on the Maintenance Form. The EPD will be notified of the repairs to the protective surface cover through the required annual reporting.

Vegetative covers will be maintained as part of regulatory maintenance activities on the property, including within the fenced Non-Accessible Area. Property landscapers will be informed of this MMP which requires maintaining vegetative covers. Should emergency work require exposure of the soil after removal of the vegetative cover, the vegetative cover will be replanted promptly following work activities.

4.2 Fencing and Signage

Fencing

Fencing has been installed along the perimeter of the Non-Accessible Area to prevent unintended access. Fencing will be visually inspected to ensure it has maintained integrity. Gates will be inspected to confirm they are locked and preventing access to the area. Any damages (i.e. holes, tears, or damaged posts) will be repaired promptly following discovery. The EPD will be notified of the repairs to the fencing with that year's annual reporting.

Permanent Markers

As required under Section 391-3-19-.08 (7) of the HSRA Rules, permanent markers are installed on the Subject Property. Disturbance or removal of such markers is prohibited. The integrity of the markers will be inspected and maintained to avoid being altered, crushed, broken, defaced, destroyed, or unreadable. The results of the inspection will be recorded on the Inspection Form provided in Attachment C. Observed significant changes to the permanent markers during the inspection will be noted therein.

Any damage or alterations to the permanent markers will be repaired promptly following discovery. The repairs will be made in accordance with sound engineering practices and will be conducted by qualified personnel, as applicable. The EPD will be notified of the repairs to the permanent markers through the required annual reporting.

4.3 Groundwater and Land Use Restrictions

During the inspection, the inspector shall look for indications of access to, or tapping of, groundwater on the Subject Property.

Unless the UEC is terminated, the Subject Property shall only be used in accordance with the approved Type 5 RRS remedies and in a manner that protects against exposure to impacted media. The inspection must verify the use of the Subject Property to be consistent with the intended land use. The results of the inspection must be documented in the Inspection Form provided in Attachment C.

4.4 Monitoring and Maintenance Plan

Should revisions to this MMP be required, such revisions will be submitted to the EPD for review and approval within 90 days.

4.5 Vapor Intrusion Mitigation System

The building foundations include a Vapor Intrusion Mitigation System (VIMS) barrier system, incorporating the Land Science Technologies MonoShield barrier and associated venting products. These venting systems penetrate the buildings at 33 locations, running vertically through the interior walls and connecting to the pitched roof system.

The discharge piping exhaust must be a minimum of 24 inches above the roof surface and at least 10 feet away from any windows, air intakes, or other openings. Typically, as referenced in the VIMS design plan set, adjustments to the discharge locations are made in the attic using sweeping 45-degree pipes to avoid such conflicts.

The tops of the discharge pipes should be equipped with passive wind turbines, as specified in the design plan.

4.6 Maintenance and Repairs

Any maintenance or repairs required to the engineering controls must be conducted in a timely manner and must be documented in the Maintenance and Repair Form (see Attachment D) and included in the required annual reporting to the EPD. Damage identified should be reported to local management during and/or immediately following the inspection. As noted above, repairs to the engineering controls must be documented and performed promptly, within 30 days¹, following discovery.

Based on the previous soil testing results on the Subject Property, personal protective equipment (PPE) should include Level D generally including safety glasses, hard hat, ear plugs, safety gloves, steel toed boots, and safety vests, at a minimum. All disturbance activities, planned and/or unforeseen, are to be completed by contractors in accordance with OSHA requirements. The Contractor is responsible for meeting all OSHA requirements and documentation, including worker safety. All companies involved in the execution of the maintenance and/or repair requirements of this MMP are to prepare their own Health and Safety Plans (HASPs) for their workers as it relates to their tasks and decontamination procedures for their personnel and equipment.

¹ If permanent repairs cannot be completed within 30 days, temporary repairs (mitigation measures) must be implemented to protect human health and the environment.

Contractors conducting maintenance and/or repairs of the engineering controls will be provided a copy of this MMP. Contractors will incorporate the requirements of this MMP into their HASPs.

4.6.1 Softscapes

Any planned and/or unforeseen disturbances to the soil barrier, illustrated on Figure 3, require repairs and/or maintenance to be documented to assure its continued protection of human health and the environment. In order to limit the exposure pathway for occupants and workers, these repairs should be completed promptly following discovery. Areas of disturbance and/or work areas should be secured with temporary fencing to control and/or limit unintended access.

As detailed above in Section 2.1.1, the engineered soil barrier consists of an application of a softscape layer that is a minimum of 1 foot of environmentally tested clean soil (i.e. meeting residential Type 1/2 RRS) underlain with a demarcation barrier where hardscapes are absent.

Disturbed soils generated from within the existing engineered soil barrier profile (i.e. not including soils cut from below 1 foot, below the demarcation barrier, or covered by hardscapes) may be reused to maintain/repair the soil cap without additional testing. Any soil cut from below 1 foot in depth (i.e. below the demarcation barrier) or below hardscapes should be either 1) characterized for appropriate landfill disposal or 2) placed below the replacement engineered soil layer/demarcation barrier and/or directly below hardscapes, if it is geotechnically suitable. Wherever the demarcation barrier is breached, the layer must be replaced with an orange, non-woven geotextile material (i.e. TerraTex N04-Orange polypropylene geotextile) or equivalent. Existing soil conditions within the Non-Accessible Area are to be maintained and remain permanently fenced; however, if required due to unforeseen circumstances, soils generated/disturbed from within this portion are not to be staged and/or stockpiled beyond its fenced limits.

If soil export is required, such soil is to be stockpiled and tested, with the export managed according to the obtained analytical testing results. The stockpile must be secured and protected from erosion (i.e. stockpiled on plastic sheeting, bermed, and covered) from the time of stockpiling to the time of off-site disposal. Depending on the testing results, soil export may be disposed of at a Subtitle D landfill.

If soil import is required, such soil is to be environmentally tested prior to importing, to assure that the soils meet residential Type 1/2 RRS and remain suitable for use within the engineered soil barrier. Analytical testing for import soils is to include VOCs, SVOCs, and RCRA metals, at a minimum.

4.6.2 Hardscapes

Any planned and/or unforeseen disturbances to the protective site development hardscapes (i.e. concrete foundations/slabs including retaining walls and pool foundations, sidewalks, concrete pavement, pavers, and asphalt pavement) which control exposure to soils not covered by the engineered soil barrier, require documented repairs and/or maintenance to assure the continued efficacy of the Type 5 RRS approach. Soils beneath hardscapes are not to be used to repair or maintain the engineered soil barrier. Soils generated from below all hardscapes should be stockpiled separately for characterization/disposal or prioritized for reuse below the engineered soil barrier, if geotechnically suitable or possible. If soil export

is required, excavated soils should be stockpiled and protected from erosion (i.e. on plastic sheeting, bermed, and covered) from the time of excavation to the time of off-site disposal.

4.6.3 Vapor Intrusion Mitigation System

The VIMS terminations on the roof include passivated turbines that must remain operational indefinitely. These turbines are wind-powered only and should not be obstructed or relocated.

Any modifications or repairs to the VIMS should be conducted with the same or equivalent product. The most protective specifications and details, as outlined in the VIMS design package included in the PPCSR for this property, should be followed. If alternative or newer products are utilized, consultation should be conducted with the Consultant, Owner, EPD, and barrier manufacturers to ensure compatibility and proper repair sequencing.

Any penetrations to the building foundation, and therefore penetration of the VIMS, should be discussed in advance with the Consultant, Owner, and barrier manufacturers to ensure proper sequencing and inspection processes for reporting to EPD.

5.0 SCHEDULE AND REPORTING

This MMP, along with associated reports and maintenance logs, will be retained in the Subject Property’s management office. Inspection forms and logs will be kept for at least three years. Additionally, supporting documentation² from the annual inspections will be sent to EPD each year through the Georgia EPD Online System (GEOS). Any comments or questions regarding this document should be directed to the property manager.

5.1 Schedule

The following schedule is anticipated based on the design objectives and basis of design to date:

Inspections		
Type	Frequency and Date	Documentation
Subject Property (Site-wide)		
Engineering Controls	Annually	Inspection Form (See Attachment C)
Fencing and Signage	Annually	
Groundwater Use	Annually	
Vapor Intrusion Mitigation System	Annually	
Non-Routine Maintenance or Repairs		
Type	Frequency and Date	Documentation
Repairs or Alterations	As needed, during renovations/redevelopment	Documented and reported to EPD annually

5.2 Reporting & Recordkeeping

Inspections of the Subject Property shall occur at least annually. The results of these inspections will be included on the Inspection Forms included as Attachment C. A copy of the Inspection Form will be submitted to the EPD annually by December 15. The cover/transmittal letter for the forms shall include the name, mailing address, telephone number, and email of the person that EPD should contact regarding the requirements associated with the Subject Property.

² The supporting documentation includes representative photographs of the current site conditions and, where applicable, a Maintenance and Repairs Form that details the required maintenance or repairs, the date they were identified, the date they were repaired, and the reinspection date.

If any planned disturbances, emergency corrective actions, repairs, and/or alterations to the engineering controls are required, these activities are also to be documented and included within the annual reporting package to the EPD. All inspection records (i.e. routine and non-routine inspections) will be maintained on-site for the Owner by Subject Property management personnel.

5.3 Emergency Reporting

Unforeseen failures, disturbances, and/or breaches of the corrective measures at the Subject Property should be immediately reported to the Property Manager and Owner by site personnel. Contact information is provided below, if an emergency situation is encountered:

Owner Representative:

NAME: _____

EMAIL: _____

PHONE: _____

Property Manager/Representative:

NAME: _____

EMAIL: _____

PHONE: _____

Any repairs/modifications to the components of the protective barriers should be completed promptly and will require reporting to the EPD within the annual reporting package.

6.0 TERMINATION

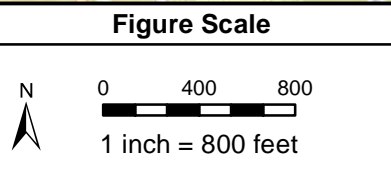
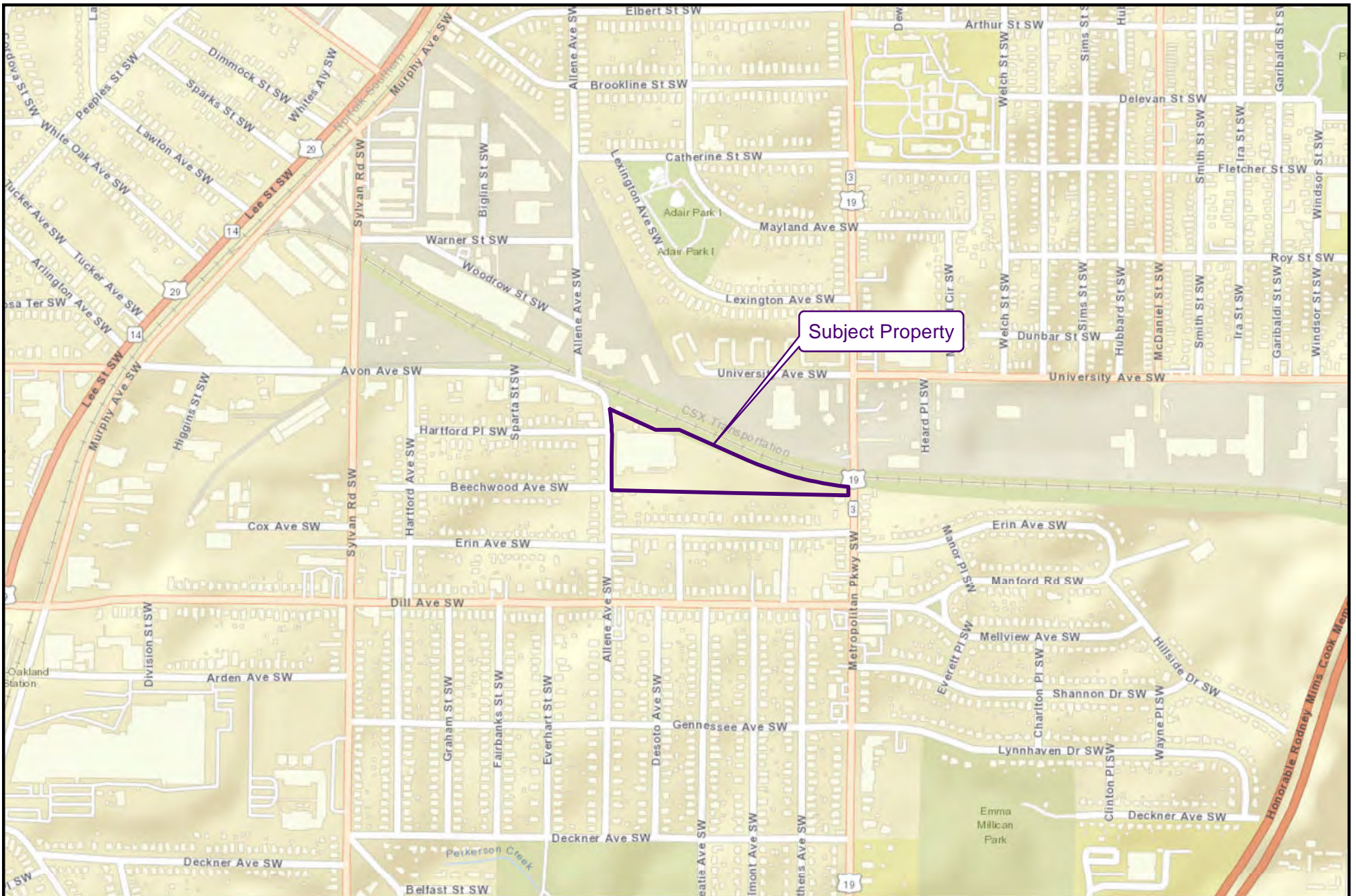
In the event that termination of the UEC and Type 5 RRS remedies on the Subject Property can be supported, a report will be prepared by a Georgia registered Professional Engineer or a Georgia registered Professional Geologist. Formal approval of system termination by the EPD is required via submittal of a status report, prior to deactivation and/or removal.

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ATTACHMENT A

Figures

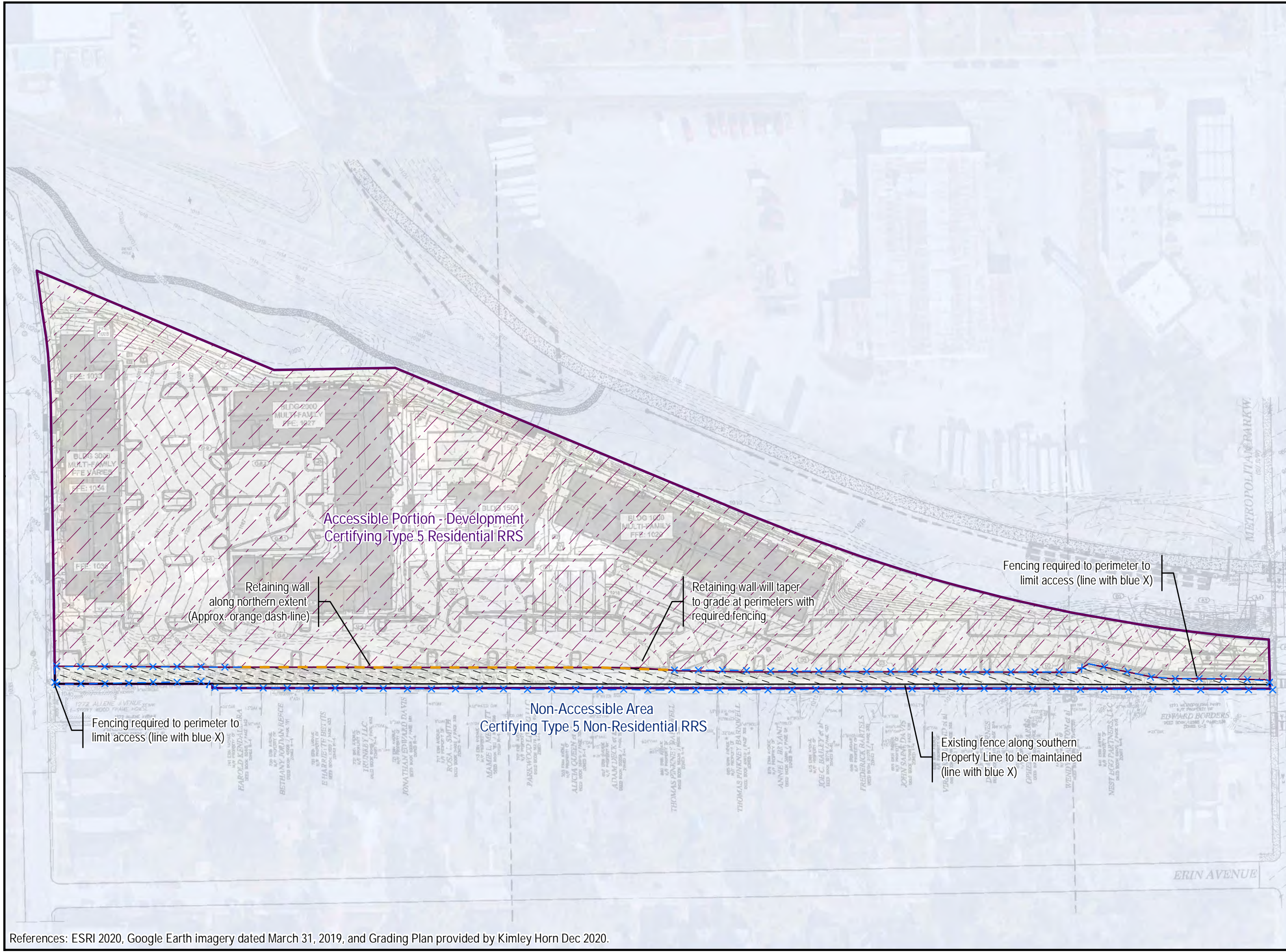




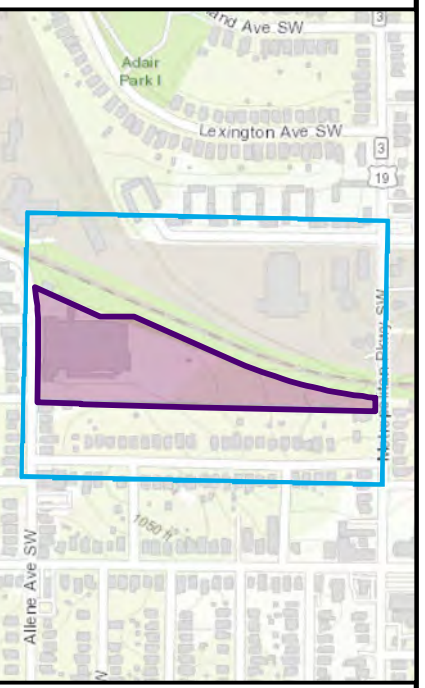
Prepared:	SCC
Checked:	RCG
Date:	08/31/20

Title:	Subject Property Location Map
Project:	Adair Park (formerly ESB, Inc.)
Project No.:	20-GA-04481-01
Client:	RangeWater

FIG. 1



Map Index



Legend

- Existing Fencing
- Retaining Wall
- Residential Type 5 Remedy
- Non-Residential Type 5 Remedy
- Subject Property Boundary

Original version of this drawing is in color. Black and white copies may not accurately depict certain information.

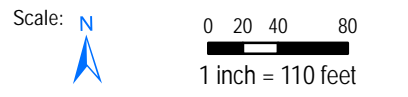


UNITED CONSULTING
 625 Holcomb Bridge Road, Norcross, Georgia 30071
 770-209-0029 Fax 582-2900 www.unitedconsulting.com

Project:
Adair Park (Former ESB, Inc.)

Client:
1246 Allene Owner, LLC

Sheet Title:
Areas of RRS Certification



Prepared:	S. Cox
Checked:	R. Griebel
Date:	Jul 10, 2024
Project No.	20-GA-04481-01

Figure 2

References: ESRI 2020, Google Earth imagery dated March 31, 2019, and Grading Plan provided by Kimley Horn Dec 2020.

Map Index



Legend

- ✕ Fencing
- Concrete/Building Cap
- Pavement Cap
- Soil Cap
- Non-Accessible Area: Southern Boundary
- Subject Property Boundary

Note:
 The Type 5 approach includes an engineered cap to control exposure to impacted soils. The cap will include impervious barriers (i.e. building, pavement, handscape), and/or a minimum of **one foot** of environment tested clean soils at final grade. The 'Non-Accessible Area' approach includes keeping the existing vegetative cap and including additional mulch and fencing to limit access to the area.

Original version of this drawing is in color. Black and white copies may not accurately depict certain information.



Project:
 Adair Park (Former ESB, Inc.)

Client:
 1246 Allene Owner, LLC

Sheet Title:
 Type 5 RRS Engineering Controls

Scale:
 0 50 100
 1 inch = 110 feet

Prepared:	S. Cox
Checked:	R. Griebel
Date:	Jul 31, 2024
Project No.	20-GA-04481-01

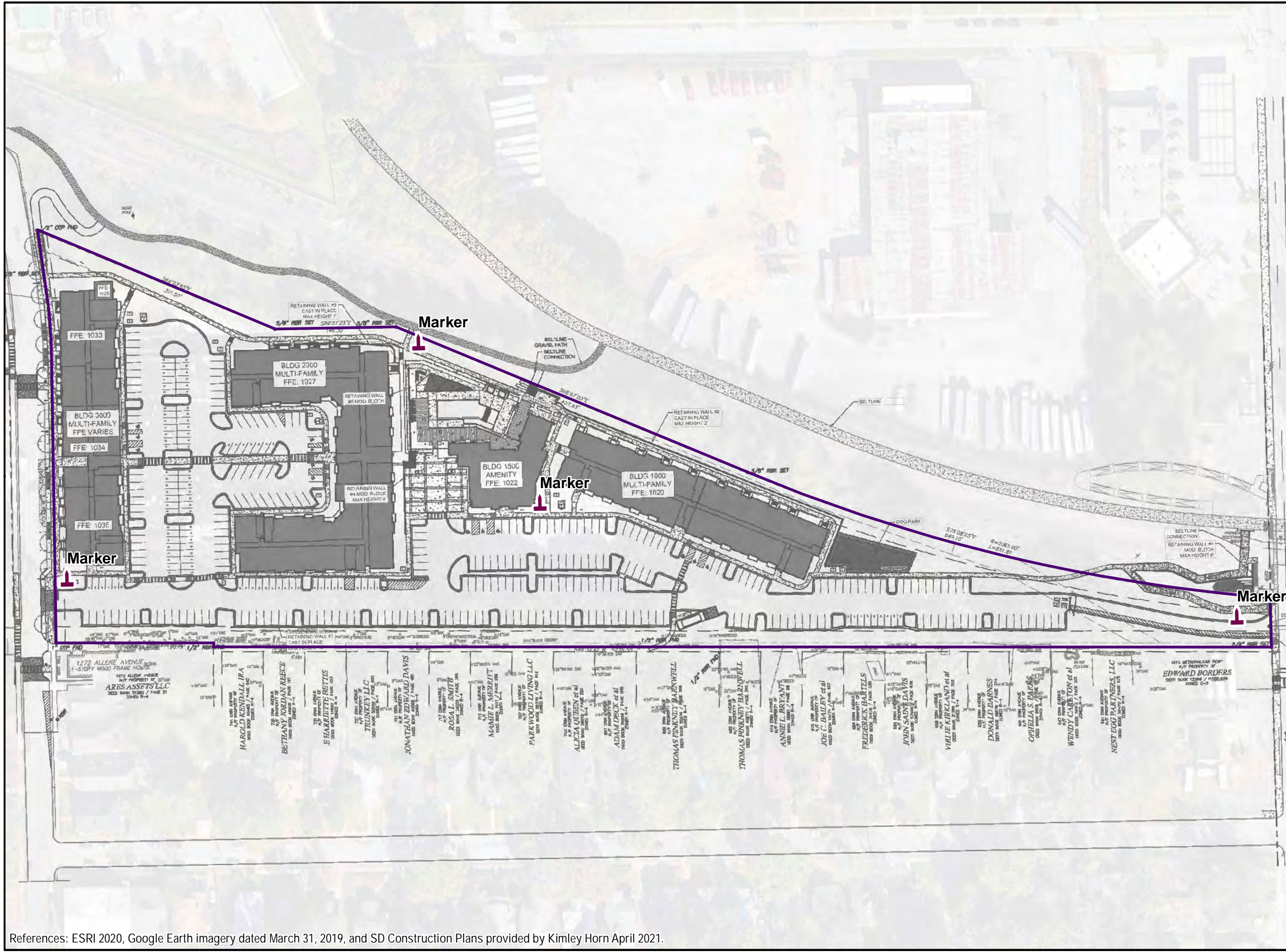
Figure 3



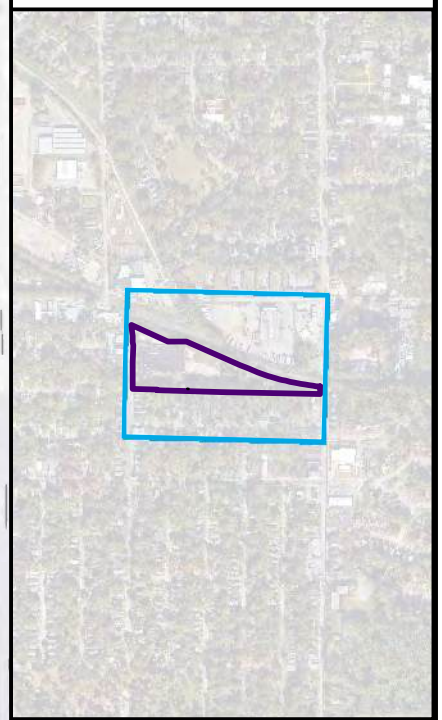
Fencing required to be maintained to perimeter of 'Non-Accessible Area' to limit access.

Existing vegetation supplemented with additional density of trees and shrubs. Density to be restricted by existing tree save driplines and critical root zones. Area to remain non-accessible.



References: ESRI 2020, Google Earth imagery dated March 31, 2019, and SD Construction Plans provided by Kimley Horn April 2021.



Map Index



Legend

-  Monuments
-  Subject Property Boundary

Note:
Monument locations are approximate.

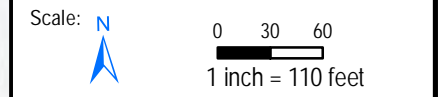


UNITED CONSULTING
625 Holcomb Bridge Road, Norcross, Georgia 30071
770-209-0029 Fax 582-2900 www.unitedconsulting.com

Project:
Adair Park (Former ESB, Inc.)

Client:
1246 Allene Owner, LLC

Sheet Title: Permanent Marker Location Plan



Prepared:	S. Cox
Checked:	R. Griebel
Date:	Dec 16, 2024
Project No.	20-GA-04481-01

Figure 4

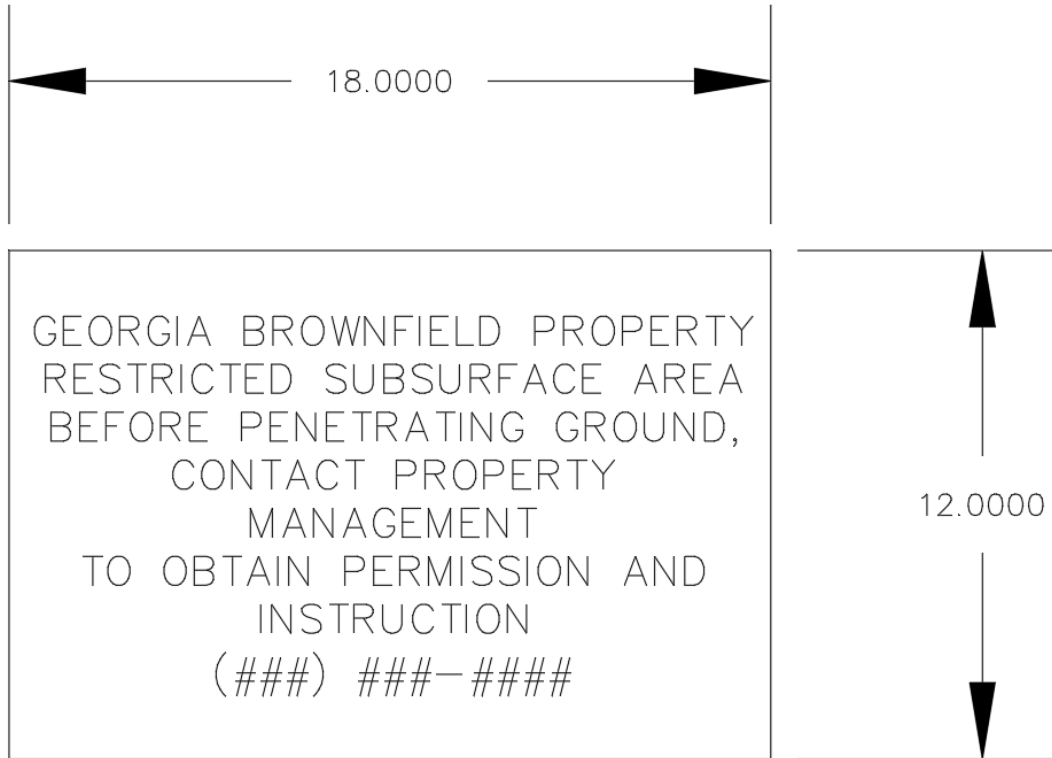
References: ESRI 2020, Google Earth imagery dated March 31, 2019, and SD Construction Plans provided by Kimley Horn April 2021.

ATTACHMENT B

Permanent Marker Specifications



Signage Specifications (Permanent Markers)



NOTE:
Not to Scale
Units in Inches

ATTACHMENT C

Inspection Form



Appendix C — Inspection Form
1246 Allene Avenue, Atlanta, Fulton County, Georgia

No.	Criteria Response	YES	NO
Subject Property Use			
1	Does the Subject Property meet the use criteria for the approved Type 5 RRS remedies (i.e. engineering controls), protective of exposure to impacted media?		
1a	If no to 1, has the Uniform Environmental Covenant (UEC) been terminated?		
1b	If yes to 1a, attached a written explanation to document the closure of long-term maintenance requirements.		
1c	If no to 1a, provide a written explanation as well as complete the below.		
Engineering Controls			
Hardscapes			
2	Are the various hardscapes (i.e. concrete foundations/slabs, pool foundation, asphalt paving, retaining walls, sidewalks, concrete pavement, pavers) on the Subject Property intact and of sufficient quality to prevent exposure to impacted soils? (See Figure 3 in the Monitoring and Maintenance Plan; MMP)		
2a	If no to 2, are corrective measures being taken? Perform repairs promptly following discovery.		
Engineered Soil Barrier (Soil Cap)			
3	Is the protective surface cover (soil cap and demarcation barrier) intact and of sufficient quality to prevent exposure to impacted soils? (See Figure 3 of the MMP)		
3a	If no to 3, are corrective actions being taken? Perform repairs promptly following discovery. Please attach a written explanation.		
Signage (Permanent Markers)			
4	Are the four permanent markers at the Subject Property in place and legible? (See Figure 4 of MMP)		
4a	If no to 4, are corrective actions being taken? Perform repairs promptly following discovery. Please attach a written explanation.		
Non-Accessible Portion and Fencing			
5	Is this area undisturbed with fencing intact and gates secured? Is the landscaping undisturbed with no evidence of erosion? (See Figure 2 of MMP)		
5a	If no to 5, are corrective actions being taken? Perform repairs promptly following discovery. Please attach a written explanation.		
Groundwater			
6	Is there evidence of the use of groundwater other than for groundwater sampling, analysis, and monitoring?		
6a	If yes to 6, take immediate actions to stop such use, and properly close and abandon such wells. Please attach a written explanation.		
Monitoring and Maintenance Plan			
7	Based on review of the MMP, are revisions to the plan needed?		
7a	If yes to 7, submitted the revised MMP to the EPD for review and approval within 90 days.		
Vapor Intrusion Mitigation System (VIMS)			
8	Are the termination discharge pipes installed with passive turbines unobstructed?		
8a	If no to 8, are corrective actions being taken? Perform repairs promptly following discovery. Please attach a written explanation.		
Inspection			
9	Date of inspection:		
9a	Name of inspector:		
9b	Photographs showing current land use, engineering controls, and permanent markers (attached)		
9c	If approved disturbance or maintenance activities were conducted, please include and document in accordance with Section 3.0 of MMP.		

Appendix C — Inspection Form
1246 Allene Avenue, Atlanta, Fulton County, Georgia

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

ATTACHMENT D

Maintenance and Repairs Form



**Appendix D
Maintenance and Repairs Form
1246 Allene Avenue
Atlanta, Fulton County, Georgia**

Item No. (See Annual Evaluation Form)	Maintenance or Repairs Required	Date Identified	Date Repairs Completed	Re-inspection Date and Initials

Note:
Photographic documentation should be provided, as appropriate, relative to the maintenance or repairs.