

ESB, INC. SITE PROPERTY (ESB); HSI #10778 MONITORING AND MAINTENANCE PLAN

1.0 GENERAL PROCEDURES

The ESB, Inc. Site Property (Property) was remediated and closed under the Voluntary Remediation Program (VRP). The Property currently meets Type 4 and Type 5 Risk Reduction Standards (RRS) for soils. The upper 2 feet meets a non-residential Type 4 RRS for lead of 1,330 mg/kg. Soils greater than 2 feet in depth meet a Type 5 RRS for lead. The existing concrete building slab will serve as an engineering control for soil located beneath the building slab with concentrations that may exceed the Type 4 RRS for lead, see Figure 1. Any activity on the Property that may result in the release or exposure to the regulated substances that were identified in the Voluntary Remediation Plan submitted pursuant to the Georgia Voluntary Remediation Program Act, O.C.G.A. §12-8-100, et seq., is prohibited.

The property will be monitored and maintained throughout the year. The Monitoring and Maintenance Plan must be followed to ensure that the engineering controls, where present and described herein, remain in place on the Property. An annual inspection report and any required maintenance of the property conducted during the year will include inspections of the surface cover conditions on the property and surveyed permanent markers on the property.

Inspections will be made by qualified personnel on an annual basis. The inspections are described in Section 2.0 with an example inspection form included as an attachment to this Plan. Records of these inspections will be maintained for 3 years. These procedures and activities will be followed during the annual property inspection.

With the exception of work necessary for the maintenance, repair or replacement of surface soils or engineering controls, the following activities are prohibited in soils greater than 2 feet from the surface or beneath the building slab: 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. Groundwater use or extraction beneath the property for drinking water or any non-remedial purpose is prohibited.

Activities that are otherwise prohibited may occur in conjunction with redevelopment of the Property under a plan approved by the Georgia Environmental Protection Division (GA EPD), or as may be necessary for the maintenance, repair or replacement of engineering controls, as specified in the January 2020 Monitoring and Maintenance Plan, or as amended and approved by GA EPD.

2.0 MONITORING AND MAINTENANCE

The inspections of the Property will include the following activities:

Monitoring of the condition of the vegetative cover over the entire Property. Vegetated areas will be inspected on a yearly basis to ensure the vegetative cover is present and sufficient to prevent the movement of soils off the property. The vegetative cover will be maintained as needed to comply with Ga EPD requirements. In addition, periodic seeding and erosion repair will be performed, if needed, to maintain the vegetated areas.

- Repair of areas below 2 feet that take place in vegetated areas.
- Monitoring of the surface covering on the Property will include the paved areas of the Property and the building slab. The paved areas, including the building slab, will be part of the annual inspection to ensure that the paved areas are still performing as an effective barrier to soil movement off-site or into vegetated areas on the Property. The repair of paved areas will be conducted as needed if soils are exposed during the year. Gravel may be added to areas that require replacement of asphalt pavement in lieu of asphalt replacement.
- Confirmation that groundwater is not being used at the Property on an annual basis.
- The presence of the permanent marker placed pursuant to the UECs will be confirmed on an annual basis. If the marker is found to be missing, a Georgia-licensed surveyor will be contracted to replace the marker, if necessary.

An inspection form will be completed for each annual inspection conducted using the form attached to this Plan. The inspection will occur no later than December 31st of each year. The inspection documents shall be kept on file for a minimum of 3 years.

Except for emergency utility repairs, no penetrations of concrete, asphalt and vegetative covers shall occur, except for routine maintenance of the covers. If an emergency condition related to the need to repair or replace buried utilities is implemented at the Property, an inspection of the conditions will be conducted, and a corrective action plan will be generated and implemented, if necessary to address the resulting exposures of impacted soils or groundwater at or from the property.