

MONITORING AND MAINTENANCE PLAN

Suzanna Kitchen Inc. Norcross Facility

4101 Blue Ridge Industrial Pkwy
Norcross, GA 30071

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PREPARED BY



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1. Introduction

On behalf of Suzanna's Kitchen Inc., Bowen Environmental Services has prepared this Monitoring and Maintenance Plan (MMP) for the property located at 4101 Blue Ridge Industrial Parkway, Norcross, Gwinnett County, Georgia 30071. Suzanna's Kitchen Inc. ("Property") is a tract of approximately 10.33 acres of real property with a heavy industrial land use permit. The Property is currently used for manufacturing of ready-to-eat meat products. The tax parcel ID number of the Property is R6267 031 of Gwinnett County, Georgia. The property layout is presented in **Attachment A**.

The property is sub-listed on the Hazardous Site Inventory ("HSI") of the Georgia Environmental Protection Division ("EPD") (HSI No. 10844), owing to the presence of arsenic in the soil. Based on information obtained regarding the Property, and conversations with officers of the EPD, exposure to arsenic in the soil, at the property, can be mitigated through the use of engineering and institutional controls. A Uniform Environmental Covenant ("UEC") will be applied to restrict groundwater and land use at the Property. This MMP will be implemented by the Property owner in a manner consistent with its terms.

The engineering controls will consist of a protective surface cover to minimize exposure to arsenic-impacted soil. The protective surface cover at the site consists of two components: hardscape (building, concrete and asphalt); and softscapes (grass, shrubs, and trees).

The institutional controls will include a UEC for the site, including this Maintenance and Monitoring Plan (MMP). Per the Environmental Covenant, the property shall be used only for non-residential purposes, as defined in Section 391-3-19-.02 of the Hazardous Site Response Act ("HSRA") Rules ("the Rules").

2. Planned Used of the Property

As defined in Section 391-3-19-.02 of the Rules and as permitted by the zoning regulations of Gwinnett County at the date of the Environmental Covenant, the property shall be used for non-residential purposes only. Any residential use of the property is prohibited unless approved by the GA EPD. Advance notice to the EPD must be submitted for any planned future changes in the use of the Property that will result in a significant change in the condition of the protective surface cover or a significant impact on the engineering controls.

3. Engineering Controls

A yearly inspection is required to confirm that the property is being used for in accordance with the UEC including, but not limited to:

- This MMP is being properly implemented;
- Only non-residential uses are being conducted by the owner, tenants, and other occupiers;
- Verification that groundwater is not being used for any purpose; and
- Review of leases and other agreements pertaining to the use of the property to ensure they contain provisions that prohibit any uses that are inconsistent with the UEC, and include provisions that enable the effective conduct of this MMP.

The results of the inspection are summarized in the Annual Evaluation Form provided in **Attachment B**.

Based on soil data of the surrounding properties, Gwinnett Fire Station and Berkeley Lake Village Owners Association ("BLVOA") (Gwinnett County, 2018; Berkeley Lake Village Owners Association, 2021), and GA EPD approved soil Risk Reductions Standards (RRS) for arsenic of 280 mg/kg (Type 4 RRS) and 990 mg/kg (Type 5 RRS) will be used as a reference for the MMP and SMP for this facility. The table below provides information provided in the Compliance Status Report for Fire Station 19 (Gwinnett County, 2018).

Arsenic Risk Reduction Standards (RRS)	Applicable Depth	Arsenic Concentration	References
Type 4 Soil Non-Residential Outdoor Worker	Surface to 2 feet	280 mg/kg	Compliance Status Report- Fire Station 19 January 8, 2028
Type 5 Soil Construction Worker	2 feet and more	990 mg/kg	Compliance Status Report- Fire Station 19 January 8, 2028

For soil excavations that exceed an area of 100 square feet, strict adherence to the Soil Management Plan (SMP) provided in Section 5 is required.

If an analysis of soil samples indicates arsenic concentrations exceeding the established criterion of 990 mg/kg, further soil characterization will be undertaken to determine the extent of arsenic impact in deeper soil layers. The results of this assessment will be reported to the GA EPD.

When performing soil disturbing activities that exceed an area of 100 square feet, the site must be evaluated before initiating the activity to identify any necessary health and safety standards, waste management, and disposal requirements. During the identified activity, soil and excavated materials will be properly characterized, appropriately handled, and maintained on-site, or the materials will be transported offsite for disposal, if necessary.

Any excavations carried out will be backfilled with clean soil or fill materials that are analyzed by a certified laboratory to confirm concentrations are less than the background and/or the HSRA Notification Criteria. In addition, the surface shall be restored with material comparable to the existing surface cover. The applicable Occupational Health and Safety Administration rules must also be followed when conducting intrusive operations.

Any significant soil surface damage must be repaired within 60 days of discovery. Significant soil damage means erosion or soil removal of an area larger than 100 square feet, that removes more than 1 foot of soil. Non-significant surface soil damage must be repaired within 90 days.

The Non-Scheduled Maintenance Log Form included in **Attachment C** will be used to record any observed damaged conditions and repair efforts. During the examination, any major changes to the surface soil will be noticed, and they will be recorded on the Annual Evaluation Form found in **Attachment B**.

4. Reporting

Inspections shall be performed at least annually, and the result is recorded in the Annual Evaluation Form provided in **Attachment B**. The deadline for the property owner to complete and submit the Annual Evaluation Form to EPD is January 31 of the following year.

The Annual Evaluation Form shall include a cover letter that has the details of the person that EPD should contact regarding the requirements associated with the property, such as name, mailing address, telephone number, facsimile number, and email address.

The MMP will be updated and revised as appropriate. If the revisions are required, the updated MMP will be submitted to the GA EPD for review and approval within 60 days from the revised date.

5. Soil Management Plan (SMP)

The property is currently covered by pavement, building structures, maintained landscaping, and a fenced wooded area, NW of the property. For soil-disturbing activities that exceed an area of 100 square feet, the Soil Management Plan (SMP) will be enforced. Mitigation will be carried out using a combination of engineering and institutional controls.

5.1. Control Measures of Exposure

The soil samples will be collected and analyzed for arsenic concentrations before initiating the soil disturbance activities that extend more than 100 square feet. If the arsenic concentrations exceed the non-residential risk reduction standards (RRS) level of 990 mg/kg, the following procedures must be followed.

5.1.1. Health and Safety Plans

Prior to any soil disturbance activities, a Health and Safety Plan (HSP) tailored to the project's specifics will be formulated. This plan will outline procedures and guidelines that must be followed by all workers participating in the soil disturbance operations. The HSP will also describe detailed personal protective equipment (PPE) that is required to be used during the disturbance work.

5.1.2. Chemical Hazard Assessment

The potential for the ingestion of arsenic in the soil during soil-disturbing activities will be controlled by prohibiting any eating, smoking, or drinking in the work zone.

Absorption of arsenic will be controlled by requiring all field personnel to remove soil particles adhered to their clothing and boots prior to leaving the work zone. Inhalation of chemicals and eye injuries will be controlled by implementing dust suppression controls, including wetting soil surfaces during work. All potential exposures will be further minimized by using appropriate PPE.

Occupational Safety and Health Administration ("OSHA") Regulation 1910 Part 1910.1018(c) states that the airborne permissible exposure limit (PEL) of inorganic arsenic is 10 micrograms per cubic meter. The employee shall ensure that no employee or worker is exposed to inorganic arsenic at a concentration greater than 10 micrograms per cubic meter of air, averaged over any 8-hour period.

5.1.3. Workplace Control and Practices

The control measures and work practices will be implemented and followed during the soil disturbing activities such as;

- Provide employees and workers with hazard information and training.
- Monitor airborne concentrations of arsenic.
- Use engineering controls if the concentration exceeds the recommended exposure level.
- Provide eye wash stations and emergency showers.
- Employees and workers must wash at the end of the work shift.
- Change into clean clothing if clothing becomes contaminated, and do not take contaminated clothing outside the workplace.
- Do not eat, smoke, or drink in areas where soil-disturbing activities occur.
- Wash hands carefully before eating, smoking, drinking, or using the toilet.
- Use a wet method or vacuum to reduce dust during soil-disturbing activities. A high-efficiency particulate air filter must be used when vacuuming.

5.1.4. Personal Protective Equipment

The workers will be provided with the appropriate personal protective equipment (PPE), and training will be conducted on how and when to use the protective equipment. The minimum PPE includes;

- Gloves and Clothing: To avoid skin contact with Arsenic, gloves, and clothing made from material that cannot be permeated or degraded by this substance will be provided. The type of equipment will be selected based on recommendations of safety equipment suppliers and manufacturers on the most protective gloves and clothing material for the specific activity.
- Eye Protection: Workers will wear impact-resistant eye protection with side shields. A face shield with goggles will be used when performing soil-disturbing activities where dusting is anticipated.

5.2. Field Work Method and Procedures

The section provides procedures to be followed when engaging in soil-disturbing activities that exceed an area of 100 square feet and when arsenic concentrations surpass the RRS level of 280 mg/kg.

5.2.1. Pre-Soil Disturbing Activities

Before any soil-disturbing activity, the project supervisor will communicate with all workers and associated parties to ensure everyone fully understands the activities to be conducted and follows the procedure outlined in the SMP. A project-specific Health and Safety Plan (HSP) will be prepared to address chemicals that may be presented, potential exposure, and toxicological effects and procedures to avoid or minimize the exposure. The applicable permits will be obtained before commencing the activity. The HSP will be maintained on-site during the soil-disturbing activities.

5.2.2. During Disturbing Soil Activities

During the soil-disturbing activities, the project supervisor will be on-site to oversee the activity. If necessary, dust will be controlled by wetting the soil in an area where soil removal is being performed.

5.2.3. Management of Excavated Soil and Soil Characterizations

Excavated soil and materials will be staged at secure locations on the property where it prevents liquid infiltration, runoff, and fugitive dust generation by storing in covered drums, containers or enclosed with plastic sheeting.

Prior to disposal, a sample of the excavated soil will undergo testing and characterization. The testing will at least include the assessment of arsenic levels in the soil. Additional testing parameters will be analyzed in accordance with the requirements of the designated landfill. The sampling and testing procedures will be conducted according to Soil Sampling Procedures provided by the Region 4 U.S. EPA Laboratory Services and Applied Science Division, Athens, Georgia (Document ID: LSASDPROC-300-R4, effective June 11, 2020).

Once, soil characterization is completed, the contractor will arrange for transportation and disposal of the excavated soil within 90 days from the completion of the soil disturbing activities. The waste transportation will be followed Rule 391-3-11-.09: Standards Applicable to Transporters of Hazardous Waste.

5.2.4. Backfill Materials

The excavated area will be refilled using soil or construction materials from approved sources, as authorized by the Georgia Department of Transportation (GA DOT). These approved sources have undergone thorough evaluations to ensure that the materials provided are of the highest quality with the least potential for contamination.

5.2.5. Equipment Decontamination

Equipment that comes into contact with potentially contaminated soil will be decontaminated before use. The decontamination will be performed as per Field Equipment Cleaning and Decontamination provided by Region 4 U.S. EPA Laboratory Services and Applied Science Division, Athens, Georgia (Document ID: LSASDPROC-205-R4, effective June 22, 2020).

Wash water generated from equipment decontamination activities will be placed in a storage container and appropriately disposed of after completion of the decontamination activities.

5.2.6. Post-Soil Disturbance Activities

After soil excavation and related activities are completed, the report will be written to provide detailed information about the activities performed, including the location of the activity, amount of material removed, amount of backfill material replaced, soil stabilization methods, number of samples collected, analytical testing results and parameters, health and safety protocols, and monitoring activities. Additionally, soil stabilization efforts will be conducted in accordance with Georgia Erosion and Sediment Control requirements.

The post-activity report, laboratory analytical results, waste manifests, weight tickets, and final disposal reports will be maintained on-site.

5.3. Worker Requirements

All workers performing soil disturbance activities as described in Section 5.2, including but not limited to excavation, grading, and placing fill materials, must comply with the procedures. Workers who do not comply with the procedures will not be permitted to work at the site and may be held financially responsible for inappropriate soil and/or groundwater management and/or disposal activities.

Suzanna's Kitchen and its contractors are independently responsible for ensuring the safety of their employees and workers during activities performed at the site. All onsite workers must comply with regulations and requirements such as OSHA Standards, RCRA Acts, and applicable standards.

All workers must review the SMP before initiating the work and will be properly trained for conducting fieldwork, field screening, and any related activities. The appropriate PPE will be used, and appropriate methods for handling and managing excavated soil will be followed.

5.4. SMP Documentation

The soil-disturbing activities undertaken, as described in Section 5.2, will be recorded in a field logbook. At a minimum, the information to be recorded will include;

- General daily activities conducted.
- Work start and stop times.
- Field observations and a detailed description of during sampling.
- Soil sample descriptions.
- Sketch of site and sampling locations, sample depth, and measured distance.
- Field instrumental reading and calibration log.
- Summary report of meeting, discussion, and communication with contractors, workers, and interested parties.
- Detailed description of PPE used.

Upon completion of disturbing soil activities and waste disposal, a summary report will be submitted to the GA EPD within 30 days of work completion. The report will include the following information:

- Summary of work performed, including the Field Work Method and Procedures as described in Section 5.2;
- Description of each deviation from the approved SMP and the reasons for deviation.
- Laboratory reports for all samples collected.
- Waste manifest.
- Photographic documentation.

6. References

Berkeley Lake Village Owners Association (HIS No. 10844). (2020) Final Compliance Status Report, North Berkeley Lake Road NW, Duluth, Gwinnett County, Georgia, May 2020.
<https://epd.georgia.gov/about-us/land-protection-branch/hazardous-waste/voluntary-remediation>
(Accessed: 5 May 2023).

Berkeley Lake Village Owners Association. (2021) Monitoring and Maintenance Plan 3351 North Berkeley Lake Road Property HSI NO. 10844, February 2021. Available at:
<https://epd.georgia.gov/about-us/land-protection-branch/hazardous-waste/voluntary-remediation>
(Accessed: 5 May 2023).

Gwinnett County. (2018) Compliance Status Report, North Berkeley Lake Road Site (HSI 10844), Fire Station 19 Duluth, Gwinnett County, Georgia, February 9, 2018. Available at:
<https://epd.georgia.gov/about-us/land-protection-branch/hazardous-waste/voluntary-remediation>
(Accessed: 9 April 2023).

ATTACHMENTS

Suzanna's Kitchen Inc.
Maintenance and Monitoring Plan

Attachment 1 –Location Map



Attachment 2 – Annual Evaluation Form

ANNUAL EVALUATION FORM

Suzanna's Kitchen
4101 Blue Ridge Industrial Pkwy, Norcross, Georgia, 30071

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..."		
	1a	Has the use of the property changed or has construction occurred on the property?		
	1b	If no to 1 or yes to 1a, provide a written explanation to EPD with the subject Evaluation form.		
Groundwater Use	2	Has groundwater been used at the Property?		
Exposure	3	Has there been any significant change surface soil (change in grade) not previously identified to EPD? If yes, are corrective measures being taken? Provide a written explanation to the EPD with the subject Evaluation Form.		
Erosion	4	Is there evidence of soil erosion on the Property?		
	4a	If yes to 4, are corrective measures being taken? Provide a written explanation to the EPD with the subject Evaluation Form		
Property Instruments	5	Do all leases or other property instruments for the site have the applicable deed notice language inserted into them? (i.e., HSRA Rule 391-3-19-8 and O.C.G.A. 44.5-48.)		
	5a	If no to 5 provide a written explanation (attached) to the EPD with the subject Evaluation Form.		
Inspection	6	Date of inspection:		
	6a	Name of inspector:		
	6b	Photographs with explanation 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: _____

Signature: _____

Title: _____

Date: _____

Suzanna's Kitchen Inc.
Maintenance and Monitoring Plan

Attachment 3 – Non-Scheduled Maintenance Form

NON-SCHEDULED MAINTENANCE FORM*

Suzanna's Kitchen
4101 Blue Ridge Industrial Pkwy, Norcross, Georgia, 30071

Date Issue Identified: _____

Name of Inspector: _____

Issue:

Change to Soil Surface: _____

Description of the Surface Soil Condition:

Severity of Observed Damage:

Start Date of Repaired: _____ **End Date of Repaired:** _____

Description of the Repairs:

*Non-Scheduled Maintenance Form to be used for documenting observations and maintenance activities that are not included in the Annual Evaluation. This form, and any other supporting materials, should be submitted to the EPD with the Annual Evaluation Form on or before January 31 of the following calendar year.