

Monitoring and Maintenance Plan

Coastal Concrete Site

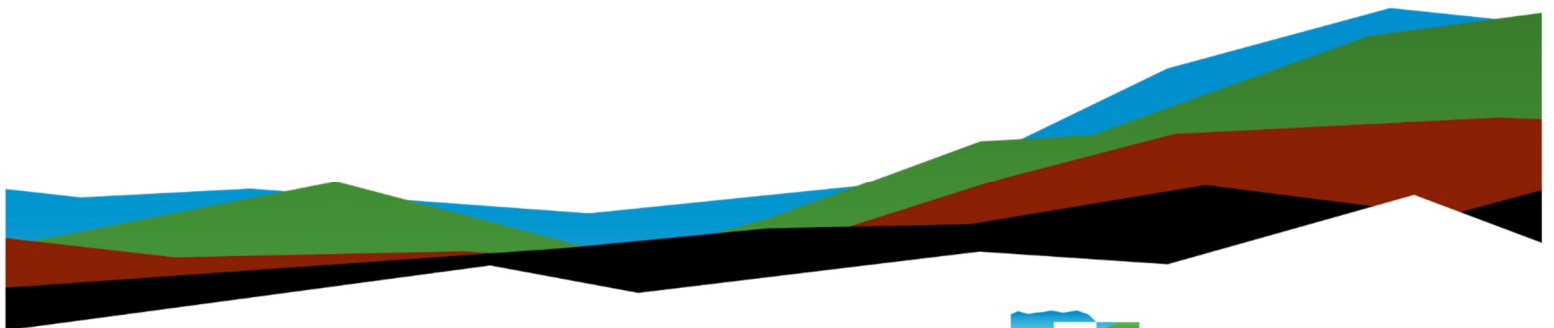
2337 Louisville Road, Savannah, Georgia

Georgia EPD HSI No. 10867

January 27, 2026 | Terracon Project No. ES177147

Prepared for:

Royal Transportation Services, Inc.
Miami, Florida



Prepared by:

Terracon Consultants, Inc.

Savannah, Georgia



Nationwide
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- Facilities
- Environmental
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- Materials



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January 27, 2026

Royal Transportation Services, Inc.
10800 NW South River Drive
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Attn: Mr. Oscar Acharandio
E: oscar@protransportusa.com

Re: Monitoring and Maintenance Plan
Coastal Concrete Site
2337 Louisville Road
Savannah, Chatham County, Georgia
Terracon Project No.: ES177147

Dear Mr. Acharandio:

Terracon Consultants, Inc. (Terracon) is pleased to submit the enclosed Monitoring and Maintenance Plan (MMP) for the above-referenced site. The MMP is a guidance document for successful implementation of the corrective actions/remedies prescribed by the Voluntary Remediation Program Compliance Status Report and required by the Uniform Environmental Covenant associated with the property.

If you have any questions or comments pertaining to the material presented herein, please contact the undersigned at (912) 629-4000.

Sincerely,

Terracon Consultants, Inc.

A handwritten signature in blue ink, appearing to read "Matt Miller".

Matthew A. Miller, PG
Senior Geologist

A handwritten signature in blue ink, appearing to read "Stewart Dixon".

Stewart A. Dixon, PG
Principal / Senior Geology Consultant

C: Mr. Jack Myer – Georgia EPD VRP Unit, via email: Jack.Myer@dnr.ga.gov
Mr. Stephen A. McCullers – Morris, Manning & Martin LLP, via email smccullers@mmmlaw.com

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Annual Uniform Environmental Covenant Certification Form

Annual Property Evaluation Form

1.0 Introduction

This Monitoring and Maintenance Plan (MMP) has been prepared for the Coastal Concrete VRP Site (the Site) pursuant to the requirements of the Georgia Environmental Protection Division (EPD) Voluntary Remediation Program (VRP).

The Site, including the entirety of Chatham County Tax Parcel 2-0599-01-010, is subject to a deed restriction in the form of a Uniform Environmental Covenant (UEC). The UEC restricts property usage to limit potential exposures to contaminated chlorinated volatile organic compounds (CVOCs) remaining in groundwater associated with the Site following successful completion of VRP site assessment and corrective action.

1.1 Site Description and History

The Site is a single parcel consisting of 4.923 acres of industrial land located at 2337 Louisville Road in the City of Savannah, Chatham County, Georgia. The Site identified by Chatham County Tax Assessor Parcel ID No. 2-0599-01-010.

The Site is improved with a slab on grade construction service garage (Truck Shop) with attached storage and open-air maintenance areas, free standing intermodal containers used for equipment storage, a prefabricated (elevated) office building, concrete paved areas, and an electrified perimeter chain-link fence. A diagram of the Site identifying the location of former site features, current site features, and environmental sampling locations is included as Figure 1.

The Site was used as a truck service/garage facility from as early as 1959 into the mid-1990s. The northeast portion of the property formerly contained a meatpacking facility while the eastern portion of the property contained storage buildings and holding pens associated with the former meatpacking facility. A rail spur associated with the former meatpacking facility was formerly located along the southern and eastern boundaries of the Site. Coastal Concrete, Inc. operated the Site as a ready-mix concrete plant from 2005 through 2012. CVOCs were detected in groundwater at the Site during a 2007 environmental assessment. CVOCs were historically used as industrial solvents and degreasers. The concentration of CVOCs detected in 2007 exceeded the Georgia Hazardous Site Response Act (HSRA) Notification Concentrations (NCs) for the CVOCs tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), and vinyl chloride (VC).

Royal Real Estate Services, Inc. purchased the Site in 2012, enrolled the Site in the VRP in 2018, and completed environmental assessment and corrective action required by the VRP in 2025. On behalf of Royal Real Estate Services, Inc., Terracon submitted a VRP Compliance Status Report (CSR) to EPD in October of 2025. The CSR demonstrated that occurrence and concentration of CVOCs present in groundwater at the Site do not pose a

threat to human health or the environment if the Site is operated and maintained in accordance with the property use limitations defined by the UEC. One of the UEC requirements is to manage potential environmental exposure to site occupants by implementing this MMP.

The VRP CSR and related documents detailing environmental assessment and cleanup activities performed at the Site are a matter of public record and may be viewed online via the Georgia Environmental Online System (GEOS). The UEC is maintained for review by the current property owner and is also recorded at the Chatham County Superior Court Clerk's Office, Real Estate Recording Division.

1.2 Monitoring and Maintenance Plan Purpose and Scope

The MMP is a guidance document for day-to-day site operations and is designed to augment the information presented in the UEC. The MMP describes the implementation and operational requirements of the engineering and institutional controls, as well as reporting and other administrative requirements imposed by the UEC. The MMP should be reviewed and implemented by facility operations staff responsible for maintenance and upkeep of the facility, facility and third-party personnel who may contact groundwater, such as construction excavation workers, and personnel managing both planned renovation and redevelopment of the facility or managing potential emergency responses.

Engineering controls are physical devices, measures, or systems employed at a property to minimize the potential for exposure to a contaminant, to control contaminant migration, or to maintain the effectiveness of other contamination avoidance measures. Given the limited nature and extent of groundwater contamination at the Site, engineering controls are not required.

Institutional controls are legal or administrative measures that minimize the potential for human exposure to contaminants of concern or protect and enhance the performance of an engineering control. Institutional controls are implemented at the Site through the UEC and include restriction of the Site to non-residential use, prohibition of site groundwater usage, certain redevelopment restrictions, and implementation of a soil and groundwater management plans in this MMP.

This MMP should be reviewed during annual reporting activities for continued validity in light of potentially changing site conditions. If revisions are necessary, the revised MMP should be reviewed by a qualified environmental professional and significant revisions submitted to EPD for review.

2.0 Institutional Controls

Institutional controls at the Site include activity use limitations and administrative/reporting requirements relevant to the environmental condition of the property. The following sections summarize these requirements in detail as established in the UEC.

2.1 Property Use Restrictions

2.1.1 Non-residential Use

Use of the Property shall be limited to non-residential activities unless it is first demonstrated to EPD's satisfaction that any other use will not result in exposure of individuals to regulated substances at concentrations greater than the applicable EPD Risk Reduction Standards (RRS).

2.1.2 Groundwater Use

The use or extraction of groundwater beneath the Property for drinking water or any other non-remedial purpose is prohibited unless conducted in accordance with the Soil (Section 2.2) and Groundwater (Section 2.3) Management Plans included in this MMP.

2.1.3 Vapor Intrusion Assessment

Prior to construction of any new structure designed for human occupancy, or renovation of an existing unoccupied structure to include human occupancy, the vapor intrusion hazard posed to proposed occupants shall be evaluated and mitigated in accordance with the current and applicable EPD vapor intrusion assessment technical guidance.

2.1.4 Permanent Markers (Signage)

Permanent markers that specify the property use limitation described in the UEC and MMP shall be installed and maintained at the primary point of entry to the Property and maintained. Disturbance or removal of any such markers is prohibited.

The markers should read:

ENVIRONMENTAL NOTICE
THIS PROPERTY IS SUBJECT TO AN ENVIRONMENTAL COVENANT
CONTACT THE FACILITY MANAGER PRIOR TO DIGGING OR LAND DISTURBANCE ACTIVITIES
ADDITIONAL INFORMATION MAY BE OBTAINED BY CONTACTING
THE GEORGIA ENVIRONMENTAL PROTECTION DIVISION

2.2 Soil Management Plan

Soils at the Site comply with the Type 1 Residential RRS. However, any activity that disturbs the soil, including, but not necessarily limited to manual or machine excavation, trenching, digging, grading, or drilling, may result in direct or indirect contact with contaminants of concern via contaminated groundwater. Land disturbance activities shall be documented and included in the Annual Report described in Section 3 of this MMP.

Proper handling and assessment of groundwater saturated or potentially contaminated soils as described in this section is necessary as a precaution because of potential migration of contaminants into soil with fluctuations in groundwater levels. Contact with Site soils via activities such as landscape maintenance, surface grading, outdoor work activities, and/or incidental ingestion associated with these tasks do not pose an increased risk of health effects when compared to similar activities undertaken elsewhere. Such tasks are exempted from the definition of soil disturbance, and do not require management or reporting subject to this MMP.

2.2.1 Excavated Soil Handling – Unsaturated Soil

If Site maintenance requires soil disturbance, the soils present on-site above the water table may be managed using normal construction health and safety protocols, unless the soil disturbance is performed as a spill response (e.g., oil spill), exhibits signs of suspected contamination (e.g., hydrocarbon or chemical odor).

Unsaturated soils suspected of contamination should be managed as described for saturated soils.

2.2.1 Excavated Soil Handling – Saturated Soil

If Site maintenance requires soil disturbance, the soils present on-site below the water table should be managed as environmentally impacted media.

Soil suspected of contamination should be stockpiled in a secure location on the Site property in a manner that prevents liquid infiltration, run off, and generation of fugitive dust (e.g., covered drums, covered roll-off containers, or enclosed on all sides with plastic sheeting). Prior to on-site or off-site reuse or disposal, such excavated soil should be evaluated by a qualified environmental professional.

If the environmental professional determines that the stockpiled soil meets an applicable RRS, then it may be managed as described for unsaturated soil.

If the stockpiled soil does not meet an applicable RRS, then it should be managed as a waste material.

Samples of stockpiled soil should be collected and analyzed for waste characterization purposes based on the requirements of the receiving waste disposal facility. Soil samples

should be collected in accordance with United States Environmental Protection Agency Region 4 Laboratory Services and Applied Science Division Operating Procedure: *Waste Sampling* (LSASDPROC 302-R4), dated May 15, 2020, or subsequent revision.

Soil determined to be waste material should be profiled, manifested, and transported to the permitted receiving facility by a commercial carrier endorsed to transport such waste within 90 days of generation. The property owner should maintain all waste characterization and disposal records for a period of no less than 3 years.

Employers and contractors overseeing workers handling stockpiled soil determined to be waste material must determine if training in accordance with the Occupational Health and Safety Administration Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) standard as amended is required, and whether implementing a medical monitoring program pursuant to Code of Federal Regulations Title 29, Part 1910.120 is required. It is employers' and contractors' responsibility to determine the applicability of any employee health and safety requirements.

2.2.1 Management of Backfill Material

If imported backfill is required, such backfill should consist of clean soil or engineered fill material free of waste and organic debris. Backfill should be sourced from a reputable commercial source such as a permitted Georgia surface mine (borrow pit).

2.3 Groundwater Management Plan

Groundwater encountered in any future excavations or utility trenches should be managed as potentially contaminated water. Groundwater should be collected and temporarily stored in frac tanks or similar storage containers at the Site. Each temporary storage tank should be secured to prevent unauthorized access and prevent exposure to Site occupants.

Samples of dewatering effluent waste should be collected, analyzed for waste characterization purposes, and evaluated by a qualified environmental professional for discharge in accordance with the requirements of the receiving waste disposal facility. If the soil disturbance generating groundwater will be of an extended duration, such as during wholesale redevelopment of the property, then permitted discharge of the groundwater to the municipal treatment works may be an appropriate means of disposal.

Wastewater samples should be collected in accordance with United States Environmental Protection Agency Region 4 Laboratory Services and Applied Science Division Operating Procedure: *Waste Sampling* (LSASDPROC 302-R4), dated May 15, 2020, or subsequent revision.

Dewatering of excavations because of storm water flow into open excavations should also comply with the guidance provided in this section of the MMP. Construction activities should utilize diversionary structures such as berms and swales and be sequenced to reduce the

excavation area open at any given time in order to reduce the potential for stormwater discharge to excavations.

Workers performing dewatering operations or otherwise handling groundwater must determine if training in accordance with the HAZWOPER is required, and whether implementing a medical monitoring program is required. It is employers' and contractors' responsibility to determine the applicability of any employee health and safety requirements.

The property owner should maintain all wastewater characterization and disposal records for a period of no less than 3 years.

3.0 Reporting

At least annually, the current property owner must certify compliance with the UEC and describe activities undertaken to maintain the Site in accordance with the MMP. The reporting types are summarized in the following sections.

3.1 Annual Reporting

The property owner shall complete an annual status report. The annual status report shall include review and completion of measures defined by the Annual Uniform Environmental Covenant Certification and Annual Property Evaluation Forms, and attachment of additional information required by the Forms (Appendix B).

No later than December 31 each year, the Site owner shall submit the completed annual reporting forms and necessary supporting documentation to EPD. The annual report may be mailed to the following address, or submitted via an alternate method if authorized by the EPD Land Protection Branch Chief or their designee:

Georgia Environmental Protection Division
Branch Chief
Land Protection Branch
2 Martin Luther King Jr. Drive SE
Suite 1058 East Tower
Atlanta, GA 30334

3.2 Other Required Reports and Notices

3.2.1 Notice of Limitations and Requirements in Future Conveyances.

If the Site property is transferred (sold or leased), then the UEC and property use limitations must be disclosed to the purchaser and leasers. Specific requirements of the disclosure are described in the UEC.

3.2.2 Notice to EPD of Future Conveyances.

If the Site property is transferred (sold), then within 30 days of the conveyance, the owner must notify EPD and Royal Real Estate, LLC. Specific requirements of the notice are described in the UEC.

3.2.3 Notice of Change of Use.

If the Site property owner intends to change the use of the property, then the owner must notify EPD 30 days in advance. Specific requirements of the notice are described in the UEC.

3.2.4 Notice of Noncompliance.

If the owner of the Site discovers noncompliance with any provision of the UEC or this MMP, then the owner must notify EPD in writing within 10 days. Specific requirements of the notice are described in the UEC.

4.0 REFERENCES

Terracon, 2025, Coastal Concrete Site Voluntary Remediation Program Compliance Status Report.

APPENDIX A

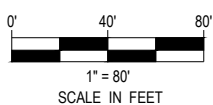
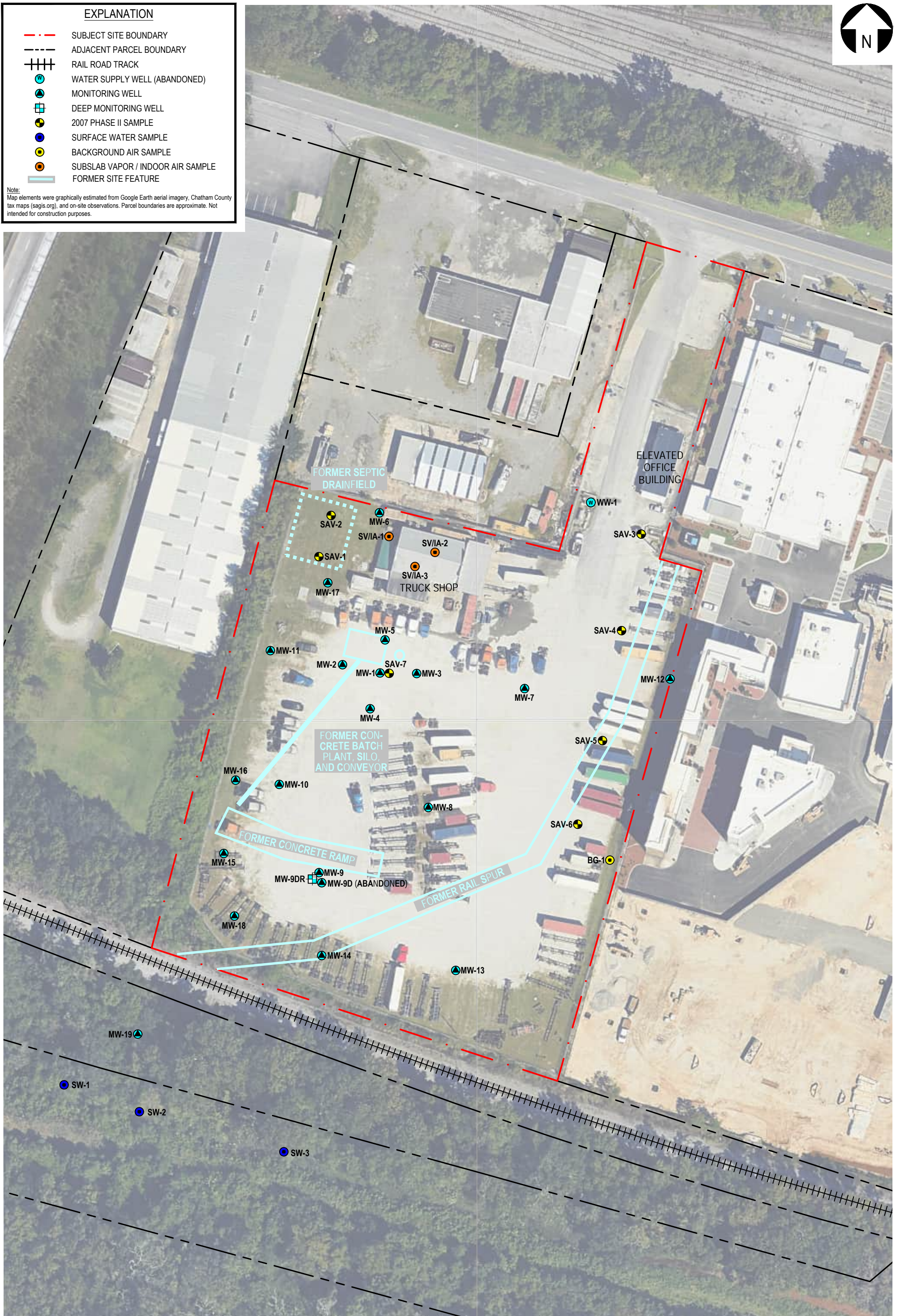
FIGURES



EXPLANATION

- · - · SUBJECT SITE BOUNDARY
- - - - ADJACENT PARCEL BOUNDARY
- + + + + RAIL ROAD TRACK
- WATER SUPPLY WELL (ABANDONED)
- ▲ MONITORING WELL
- DEEP MONITORING WELL
- 2007 PHASE II SAMPLE
- SURFACE WATER SAMPLE
- BACKGROUND AIR SAMPLE
- SUBSLAB VAPOR / INDOOR AIR SAMPLE
- FORMER SITE FEATURE

Note:
Map elements were graphically estimated from Google Earth aerial imagery, Chatham County tax maps (sagis.org), and on-site observations. Parcel boundaries are approximate. Not intended for construction purposes.



Project Mgr:	MAM	Project No.:	ES177147
Drawn By:	KMB	Scale:	AS SHOWN
Checked By:	MAM	File Name:	ES177147-PR11.dwg
Approved By:	SAD	Date:	October 7, 2025

Terracon
 2201 Rowland Avenue Savannah, Georgia 31404
 Phone (912) 629 4000 Fax (912) 629 4001

SITE DIAGRAM
 Coastal Concrete
 2337 Louisville Road
 Savannah, Chatham County, Georgia

Figure
1

APPENDIX B

FORMS

Annual Uniform Environmental Covenant Certification Form

UECs are one form of corrective action that may be used to address contamination on a property. Owners are legally required to ensure that the conditions of the UEC are maintained, to report changes in property ownership to the Georgia Environmental Protection Division (EPD) within 30 days, and to complete this annual certification. If the UEC conditions are not maintained, additional investigation and/or corrective action may be required. Each UEC has unique conditions and reporting requirements; you may find a copy of the conditions that apply to your property at: <https://epd.georgia.gov/properties-subject-uniform-environmental-covenants>.

If you have additional questions, you may contact EPD's Land Protection Branch at 404-657-8600.

I certify that I have reviewed the specific conditions of the UEC for the property located at: 2337 Louisville Road, Savannah, Chatham County, Georgia

Assigned Site Environmental Name or Number (if known): HSI #10867

What is your property's current use?

Please indicate UEC Status (select all that apply):

My property has a restriction on groundwater usage. Groundwater on the property is not being used except as permitted in the UEC.

My property has a restriction prohibiting residential use. The property is only being used for non-residential use 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, for example, day care facilities, playgrounds, schools, etc. at which activities have been or are being conducted that can be categorized in one of the 1987 Standard Industrial Classification major group...".

My property has a restriction associated with the potential for vapor intrusion. Those conditions are being met in that no new enclosed structures have been constructed and, if applicable, any existing passive vapor intrusion mitigation system remains in place and functional. If your property has an active vapor intrusion mitigation system or you have engaged in any new construction on the property, check the following box and submit the Annual Property Evaluation Form.

My property or covenant has additional restrictions or requirements. The Annual Property Evaluation Form and supporting documentation required by the EPD-approved Monitoring and Maintenance Plan are attached.

At least one condition described in the Uniform Environmental Covenant has changed. This may include, without limitation, changes to groundwater usage, ownership, fencing, vapor intrusion systems, asphalt, or concrete maintenance, etc. If ownership of part or all of the property has changed, please provide contact information for the new owner(s) below.

Annual Uniform Environmental Covenant Certification Form

If this is the case, please describe:

I, _____ (Name of individual signing the Certification), the _____ (Title), am the Responsible Official for _____ (Name of the Owner), which is a _____ (Legal form of the Entity), and am duly authorized to represent _____ (Name of the Owner) in connection with compliance with the UEC and to execute this Certification.

Certification:

Following reasonable inquiry, I certify that this document, all attachments, and the information submitted are, to the best of my knowledge and belief, true, accurate and complete.

NAME (Please type or print)

TITLE

SIGNATURE

DATE

Complete and Submit this Form with the

Annual Uniform Environmental Covenant Certification Form.

Attach a summary of maintenance or emergency response activities to this form.

1. Did maintenance or emergency response activities include contact or collection of groundwater, groundwater saturated soil, or with known or suspected chemical contamination as a result of contact with groundwater within the limits of Chatham County Tax Assessor Parcel 2-0599-01-010? Circle Yes or No.
 - a. If yes to 1., were excavated soils stockpiled on-site in a manner to prevent liquid infiltration, run off, and generation of fugitive dust? Circle Yes or No. Explain. Attach supporting information including, but not necessarily limited to, laboratory analytical data, consultant or other third-party reports, waste disposal records, etc.
 - b. If yes to a., what was the disposition of the stockpiled soil? Did the stockpiled soil comply with the Type 1 RRS? Was the stockpile reused as backfill on-site or was it disposed of off-site? Explain. Attach supporting information including, but not necessarily limited to, laboratory analytical data, consultant or other third-party reports, waste disposal records, etc.
 - c. If yes 1., was groundwater characterized and disposed of in accordance with the Monitoring and Maintenance Plan? Circle Yes or No. Explain. Attach supporting information including, but not necessarily limited to, laboratory analytical data, consultant or other third-party reports, waste disposal records, etc.

Property Owner 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 that 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: _____

Title: _____

Signature: _____

Date: _____