GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

April 24, 2020

Mr. David Cochran
c/o Larkin Owner, LLC
Paces Properties, Inc
4300 Paces Ferry Road, Suite 500
Atlanta, Georgia 30339

RE: Brownfield Compliance Status Report – Monitoring and Maintenance Plan
519 Memorial Drive Property and Veterans Radiator Property, Atlanta, Fulton County, Georgia

Dear Mr. Cochran:

The Georgia Environmental Protection Division (EPD) has received compliance status reports (CSR) for the two abovementioned properties, which are collectively known as the *519 Memorial Drive Property* (hereinafter referred to as the "property"), all of which encompass a single tax parcel (Parcel # 14-0044-000-3074). A draft Monitoring and Maintenance Plan (M&M Plan) was included with the CSRs. The brownfield remedial cleanup strategy implemented on portions of the property involved meeting the Type 5 risk reduction standard (RRS) and installing vapor mitigation systems across the entire property. The installation of engineered controls is required for the protection of human health and the environment on the portions of the property demonstrating compliance with the Type 5 RRS. Establishment of an M&M Plan is a necessary element to ensure the installed engineered controls, including the vapor mitigation systems, remain in-place, function as intended, and are properly maintained.

EPD has worked with Nova Engineering to develop and finalize the M&M Plan for the engineered controls installed at the property. By this letter, the attached M&M Plan is hereby approved for implementation at the property. For reference purposes, the approved version of the M&M Plan shall be based on the date of the M&M Plan, which is April 20, 2020.

According to the now approved M&M Plan, the first annual inspection is to be performed within 90 days of its approval. We look forward to receiving your subsequent annual report based upon the results of that first inspection.

If you have questions, or need further assistance, please contact Kent Pierce at 404-657-8675.

Sincerely,

Shannon Ridley
Brownfield Coordinator

Attachment: Approved Monitoring and Maintenance Plan, dated April 20, 2020
cc: Keith Rice, Nova Engineering
Files: 519 Memorial Drive and Veterans Radiator

MONITORING AND MAINTENANCE PLAN

519 MEMORIAL DRIVE PROPERTY

Parcel # 14-0044-000-3074

(Inclusive of the former LCI facility and the former Veterans Radiator facility)

Atlanta, Georgia

PREPARED FOR:

Larkin Owner, LLC
4300 Paces Ferry Road
Suite 500
Atlanta, Georgia 30339

NOVA Project Number: 3015116

NOVA

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April 20, 2020

LARKIN OWNER, LLC
4300 Paces Ferry Road
Suite 500
Atlanta, Georgia 30339

Attention: Mr. David Cochran

Subject: Monitoring and Maintenance Plan
519 MEMORIAL DRIVE PROPERTY
Atlanta, Fulton County, Georgia
NOVA Project Number 3015116

Dear Mr. Cochran:

NOVA Engineering and Environmental, LLC (NOVA) has completed the authorized Monitoring and Maintenance Plan for the 519 Memorial Drive Property located in Atlanta, Fulton County, Georgia. The work was performed in general accordance with NOVA Proposal Number 002-30151737.2, dated October 6, 2015.

We appreciate your selection of NOVA and the opportunity to be of service on this project. If you have any questions, or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,
NOVA Engineering and Environmental, LLC

Keith Rice, P.G.
Senior Professional Geologist

Nickolaus DaSantos
Business Unit Manager
Environmental Services

Copies Submitted: Addressee (electronic)

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APPENDICES

1.0 INTRODUCTION

The purpose of this Monitoring and Maintenance Plan (M&M Plan) is to establish routine inspections to ensure continued and effective operation of engineered controls installed at the 519 Memorial Drive Property (Subject Property). The engineered controls were designed and installed to prevent or minimize exposure to impacted soils, groundwater, and subsurface vapors at the Subject Property. Additionally, a restrictive Environmental Covenant that meets the Georgia Uniform Environmental Covenants Act has been implemented, as required to meet the Type 5 Risk Reduction Standards (RRS) and in accordance with the Brownfield Act.

The Subject Property is a 3.949-acre parcel identified by Parcel Number 14-0044-000-3074. The Subject Property was formally developed with an approximately 63,000-square foot, multi-story former warehouse/manufacturing/office facility. The facility formerly operated as Larkin Coils Inc. (LCI), which manufactured and serviced refrigeration coils. The use of Trichloroethylene (TCE) during the coil manufacturing process over many years of operation lead to the subsurface soil and groundwater impacts found at the facility. The northeastern portion of the Subject Property was formally developed with a radiator repair shop and two (2) residences south of that.

The Subject Property recently (circa 2017-2018) underwent extensive environmental remediation of soil-vapor followed by a major redevelopment of the property into an approximate 70,350-square foot multi-tenant commercial use facility with office and retail space. The main structures of the former LCI facility were retained and renovated, while new construction replaced other buildings, including the former radiator shop and residential houses. A Site Plan is included as Figure 1 in Appendix I illustrating the current (2018) redeveloped facility, post-construction.

The Owner of the Subject Property is responsible for implementation of this M&M Plan and compliance with the conditions and requirements established herein. Any reference herein to Owner or Property Management shall have the same meaning.

2.0 ENGINEERING CONTROLS

Engineering Controls were implemented on the Subject Property to limit potential exposure between human receptors and the underlying soils, groundwater and soil-vapor impacted by TCE.

Vapor Intrusion Mitigation Systems

The enclosed buildings/structures have a Vapor Intrusion Mitigation System (VIMS) installed, including a vapor barrier specific for the control of vapors associated with subsurface TCE impacts. Figure 1 shows the location of each of the buildings.

Area Caps

The Restricted Use Zone (RUZ) portion of the Subject Property has been capped with various materials. The exterior caps are either hardscape (concrete, asphalt, pavers) or softscape (landscaped areas with at least two (2) feet of clean fill above impacted soils and topped with landscape vegetation or similar materials). The exterior caps prevent direct exposure to impacted subsurface soil, and they minimize water infiltration into the impacted soils to prevent further leaching to groundwater. The interior caps are concrete slabs in the enclosed structures/building, which are an integral component of the VIMS. The Site Plan included as Figure 1 in Appendix I illustrates the RUZ areas that have been capped by building floors, concrete/asphalt paving, or by landscaped areas with at least of two (2) feet of clean soils placed above impacted subsurface soils.

Groundwater Use

The use of groundwater at the Subject Property is prohibited, except for environmental sampling and analysis.

Restricted Use Zone

The Subject Property is defined as the Restricted Use Zone (RUZ), except for the Building A2 area, as shown on Figure 1. It has been demonstrated that the Building A2 area meets soil Type 1 Risk Reduction Standards (RRS) and, therefore, can be used for unrestricted/residential purposes. The remainder of the Subject Property (the RUZ) can only be used for non-residential purposes.

Identification

Permanent markers are installed around the perimeter of the Subject Property. The marker inscription is shown in Appendix II and the approximate locations of the markers are shown on Figure 1.

3.0 MAINTENANCE AND INSPECTION DESCRIPTION

Items and systems subject to inspection and/or maintenance:

- Vapor Intrusion Mitigation System(s) (VIMS)
- Hard-surface cap and landscaped areas
- Groundwater use
- Property use restrictions

3.1 VAPOR INTRUSION MITIGATION SYSTEM (VIMS)

The activities and uses of the Subject Property must not disturb the integrity and proper operation of the VIMS (inclusive of the floor/slab) in Buildings A1-North, A1-South, A2, B, C, D and E. The design and type of VIMS installed in each building is outlined below. Building identification and location are shown on Figure 1.

RENOVATED EXISTING BUILDINGS – RETOFITTED WITH VIMS

Building A2 – Passive VIMS System

The VIMS in the enclosed area of Building A2 is a passive system that consists of two (2) parts working in tandem: 1) a passive Sub-Slab Depressurization System (SSDS), and 2) a solvent/chemical vapor barrier. The SSDS under Building A2 will be operated as a passive system that will vent unassisted to above-roof exit points. The vapor barrier for renovated Building A2 consists of Land Science's GeoSeal® system, a spray-applied asphalt-latex material between two (2) layers of High-Density Polyethylene (HDPE)-geotextile material, installed on the existing building slabs. An approximately 2-inch topping slab was then constructed over the vapor barrier in this existing building.

Buildings A1-North, A1-South, and B – Active VIMS System

The VIMS in the enclosed area of Buildings A1-North, A1-South, and B are active systems that consist of two (2) parts working in tandem: 1) a SSDS, and 2) a solvent/chemical vapor barrier. The SSDS under Buildings A1-North, A1-South, and B have been installed with roof-mounted blower systems that will vent to above-roof exit points. The vapor barrier for renovated Buildings A1-North, A1-South and B consists of Land Science's GeoSeal® system, a spray-applied asphalt-latex material between two (2) layers of High-Density Polyethylene (HDPE)-geotextile material, installed on the existing building concrete slabs. An approximately 2-inch topping slab was then constructed over the vapor barrier in these existing buildings.

NEW CONSTRUCTION BUILDINGS – DESIGN BUILT VIMS

Buildings C, D, and E – PASSIVE VIMS SYSTEM

The VIMS in the enclosed areas of Buildings C, D, and E are passive systems that consist of two (2) parts working in tandem: 1) a passive SSDS, and 2) a solvent/chemical vapor barrier. The SSDS under new Buildings C, D and E will be operated as a passive system that will vent unassisted to an above-roof exit point(s). The vapor barrier for Buildings C, D and E consists of Land Science's GeoSeal system, a spray-applied asphalt-latex material between two (2) layers of High-Density Polyethylene (HDPE)-geotextile material, installed on the finished sub-grade. The new building slab was then constructed over the vapor barrier.

3.2 VIMS OPERATION, INSPECTION, AND MAINTENANCE

The VIMS in each building shall remain operational and maintained as designed until such time it has been demonstrated to the Georgia Environmental Protection Division's (GA EPD's) satisfaction that the system is no longer required. Routine inspection and maintenance shall be performed on each VIMS according to manufacturer's recommendations to maintain proper operational condition.

For each building with an "Active" VIMS, the blower(s) are to be powered and operating continuously (24/7/365), except when maintenance or repairs require turning off the blower(s). The "Active" VIMS in each building is to be inspected annually to ensure that; the blowers are operating properly and continuously, the associated collection/vent piping that are exposed/ visible/accessible are intact and free of breaches, and that exit point(s) remain open and unobstructed. A visual inspection shall be made of the floor area in each building for signs of floor penetrations or any other indications that the SSDS piping or solvent/chemical vapor barrier may have been compromised. Figures 2A and 2C are illustrations of the SSDS piping layout design for the "Active" VIMS.

Each building with a "Passive" VIMS is to be inspected annually to ensure that associated collection/vent piping that are exposed/visible/accessible are intact and free of breaches, and that exit point(s) remain open and unobstructed. A visual inspection shall be made of the floor area in each building for signs of floor penetrations or any other indications that the Sub-Slab Depressurization System of piping or the solvent/chemical vapor barrier may have been compromised. Figures 2B, 2D, 2E and 2F are illustrations of the SSDS piping layout design for the "Passive" VIMS.

Annual inspections of the VIMS in each building must be performed by an environmental professional (inspector) that is experienced and knowledgeable of the type and design of VIMS installed at the Subject Property and the inspections are to be performed in accordance with this M&M Plan. An Inspection Log, located in Appendix II, must be completed during each annual inspection by the inspector. Completed original forms must be kept on-site in a 3-ring binder.

Property Manangement is to be informed by the inspector of VIMS deficencies observed during the annual inspection. Necessary corrective actions must be taken by Property Management to ensure each VIMS operates properly. Deficiencies observed during the inspection are to be corrected within **30-days**. When an inoperable blower(s) is detected, Property Management shall expeditiously initiate diagnosis of the problem and facilitate prompt remedy of the problem. Once corrective actions are completed, a detailed record of the corrective actions is to be noted on, or attached to, the Inspection Log and the complete document returned to the on-site 3-ring binder. If it is impracticable to complete the repair(s) within 30-days, then GA EPD shall be notificed in writing of the deficiencies and include a proposed schedule for completing the corrective action.

Weekly inspections of the VIMS in each building will be performed by maintenance personnel and their inspection results logged on the form located in Appendix II. The main purpose of the weekly inspection is to ensure the VIMS blowers are in continuous operation for the systems installed on Buildings A1-North, A1-South and B. Maintenance personnel that observe inoperable blower(s) or interior floor damage/penetrations that may cause damage or operational problems with the VIMS shall note the problem on the inspection log and promptly advise Property Management of their observation, so that appropriate action may be taken. Property Manangement shall confirm reported damage or operational problems and take the necessary corrective actions within **30-days** of the reported problem. When an inoperable blower(s) is detected, Property Management shall expeditiously initiate diagnosis of the problem and facilitate prompt remedy of the problem. Property Management shall maintain records of each reported problem by personnel along with the associated corrective actions performed. Said records and weekly inspection log shall be included in the on-site 3-ring binder.

3.3 FLOOR PENETRATIONS OR OTHER SITE WORK AFFECTING VIMS OPERATION

It is imperative the VIMS installed in each building remains intact, effective and fully operational as designed and installed. The slab/floor in each enclosed building is an integral component of the VIMS due to the solvent/chemical vapor barrier installed on an upper surface of the existing concrete floor (retrofitted existing buildings – A1-North, A1-South, A2, and B) or below the new slab/floor (newly constructed buildings – C, D, and E). Unauthorized or improper floor penetrations can seriously damage the vapor barrier or the SSDS piping.

Consequently, floor penetrations can only be performed under the oversight of an environmental professional that is experienced and knowledgeable of the specific VIMS installed at the Subject Property and in accordance with this M&M Plan. Before floor penetrating activity is performed, it is the Property Management's responsible to ensure such activity will not negatively affect the operation or integrity of the VIMS. At a minimum, Property Management shall ensure workers are given a copy of this M&M Plan.

For activity that disturbs, ruptures, or negatively affects the vapor barriers or the SSDS piping, it is the Property Management's responsibility to ensure the VIMS is properly restored and functioning as designed.

3.4 SURFACE AREA CAPS ON THE RUZ (EXTERNAL OF ENCLOSED BUILDINGS)

3.4.1 Cap Integrity – Damage, Distrubance And Repair

Activities and uses of the property must not damage or disturb the integrity of the cap in the RUZ, which is composed of hardscape (concrete/asphalt paving) and landscaped areas with at least two (2) feet of clean fill soil just below ground surface.

The cap may be penetrated in order to perform work necessary to install, maintain, or repair utilities, structures, and engineering controls. Cap disturbing activities, including cap maintenance and repair, 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.

If impacted soil is excavated from beneath the cap in the RUZ, the removed soil shall be properly handled and disposed offsite in accordance with all applicable local, state, and federal rules and regulations. Recapping of the site is necessary unless all the impacted subsurface soil in the excavated area is removed to below applicable RRSs (as demonstrated by appropriate laboratory analysis) and replaced with clean fill soil. Intrusive activities must be performed by personnel with proper training and under direction of an environmental professional.

3.4.2 Cap Inspection

Note: Inspection of the cap within buildings (concrete slab/floors, which are an integral part of the VIMS) is addressed in Section 3.1 above.

Annual inspections of the external capped areas of the Subject Property must be performed by persons experienced with this M&M Plan and under the direction of an environmental professional. An Inspection Log, located in Appendix II, must be completed during each annual inspection by the inspector. Completed original forms must be kept on-site in a 3-ring binder.

Property Management is to be informed by the inspector of deficiencies recorded during the annual inspection. Corrective actions must be taken by Property Management to return the capped areas to their original condition or similarly protective. Once complete, a detailed record of the corrective actions will be noted on, or attached to, the Inspection Log and the completed document returned to the on-site 3-ring binder.

The Restricted Use Zone (RUZ) portion of the Subject Property has been capped with various materials. The exterior caps are either hardscape (concrete, asphalt, pavers) or softscape (landscaped areas with at least two (2) feet of clean fill above impacted soils and topped with landscape vegetation or similar materials). The exterior caps

prevent direct exposure to impacted subsurface soil and minimize water infiltration into the impacted soils to prevent further leaching to groundwater. The interior caps are concrete slabs in the enclosed structures/building, which are an integral component of the VIMS. The RUZ and landscaped areas are illustrated on the Site Plan included as Figure 1 in Appendix I.

Asphalt and concrete pavement (including curbing) must be inspected along the entire capped surface. These areas shall be inspected for:

- Potholes
- Ground surface erosion or washouts
- Damage to pavement that exposes underlying soil
- Cracks that are larger than one-half (1/2) inch wide or holes that expose underlying soil

Inspection of the landscaped areas must be performed. These areas shall be inspected for:

- Ground surface erosion or washouts
- Disturbances to the landscaping (decorative rock areas, grass, shrubs, etc.)
- Any landscaped area no longer covered by landscaping materials, shall be capped by hard-scape materials (asphalt, concrete, pavers), no exposed soil shall be visible.

Deficiencies with the cap noted in the Inspection Log and reported to Property Management must be corrected within 60-days. Details of the corrective action taken shall be recorded on, or attached to, the Inspection Log upon completion and the completed document returned to the 3-ring binder.

Maintenance personnel that walk the grounds in the normal course of conducting their regular duties can also observe the condition of the cap. In the event damage or detrimental conditions of the cap are observed as described herein, maintenance personnel shall note the problem and promptly advise Property Management of their observation, so appropriate action may be taken. Property Management shall investigate reported cap damage or issues to confirm the situation and make any necessary corrective actions within 60-days of the reported problem. Property Management shall maintain records of each reported problem by personnel along with the associated corrective actions performed. Said records shall be included in the 3-ring binder.

3.5 GROUNDWATER USE

During annual inspections, the inspector shall look for indications of access to, or tapping of, groundwater on the Subject Property. Such evidence shall be recorded on the Inspection Log and reported to Property Management.

3.6 RESTRICTED PROPERTY USES

During annual inspections, the inspector shall look for indications of "residential" habitation of the RUZ. Such evidence shall be recorded on the Inspection Log and reported to Property Management.

4.0 UTILITY WORK

Before utility (electric, gas, cable, sewer, sprinklers, etc.) work is performed that has the potential to disturb soils below the buildings, concrete, asphalt-paved areas, and landscaped areas, Property Management shall ensure the utility workers are given a copy of this M&M Plan and follow the procedures herein and in accordance with the separate site-specific Health and Safety Plan.

Precautions are to be taken to protect the integrity of the Vapor Intrusion Mitigation System installed in each building (see Section 3.1). Before floor penetrating activity is performed, or other building repair/modification/maintenance is performed, Property Management shall ensure such activity will not negatively affect the operation or integrity of any VIMS. At a minimum, Property Management shall ensure workers are given a copy of this M&M Plan. For activity that disturbs, ruptures, or negatively affects the vapor barriers or the Sub-Slab Depressurization Systems, it is the Property Management's responsibility to ensure the VIMS is properly restored and functioning as designed.

5.0 PROPERTY MARKERS

The Environmental Covenant requires the installation of markers that identify the RUZ at the Subject Property. Four (4) permanent markers are installed around the perimeter of the Subject Property generally at access points to the property. The markers consist of 18-inch by 18-inch granite slabs. Inspection of the markers shall be performed as part of the annual inspection of the Subject Property. The location, visibility, legibility, and structural integrity of the markers must be maintained and noted in the Inspection Log, along with any maintenance performed on the markers. The approximate location of each marker is shown on Figure 1, and an example of the general layout of the prescribed inscription is included in Appendix II.

6.0 ANNUAL INSPECTION AND CERTIFICATION REPORT

Property Management shall ensure annual inspections are conducted by an environmental professional (inspector) that is experienced and knowledgeable with the type and design of vapor intrusion mitigation systems installed at the Subject Property and that the inspections are performed in accordance with this M&M Plan. Property Management shall be responsible for reviewing the completed inspection log and obtaining information and feedback from the inspector regarding their observations.

Property Management shall establish an on-site document repository for records pertaining to this M&M Plan (at a minimum, it shall include a copy of the most recent EPD-approved M&M Plan, a 3-ring binder for completed inspections and any associated corrective action documentation). Associated documents and records shall be maintained in the repository for a minimum of three (3) years from the date of such document or record.

The elements of the Annual Inspection and Certification Report shall serve to confirm the following during the previous twelve (12) months:

- The VIMS (inclusive of concrete sub-slab/floor) installed in each of the buildings/ structures on the Subject Property remain in good condition and continue to operate as designed.
- The cap covering the RUZ continues to remain secure and intact.
- There continues to be no use of groundwater at the Subject Property.
- The RUZ of the Subject Property continues to be used only for non-residential purposes.

The first annual inspection shall be performed within 90 days of approval of this M&M Plan. Subsequent annual inspections shall be performed during the second (2nd) calendar quarter each year. The Annual Inspection and Certification Report shall be submitted to the Georgia EPD, Brownfield Program within 30 days of the inspection.

The annual Report shall include copies of the inspector's completed inspection log form and the template letter (with unaltered compliance and certification language) signed by the Owner of the Subject Property (or by their designated officer or official). The inspection log and template letter are included in Appendix II and Appendix III, respectively, of this M&M Plan. The annual Report should include an explanation for unusual, negative, or abnormal findings by the inspector. For any items or areas reported by the inspector as needing maintenance or repair, the Report should include an explanation of when those issues will be addressed. Also, the Report should include a brief description of significant maintenance, repair, or breach of the VIMS or cap performed since the previous inspection.

Electronic submittal of the annual Report is acceptable, subject to EPD written approval of the process. Under any agreeable process reached, it shall remain the Owner's responsibility to ensure the annual Report has been received by EPD. Confirmation of receipt by EPD in the form of a reply email to the Owner shall suffice. If the Owner does not receive said confirmation email from EPD, it is the Owner's responsibility to follow up with the assigned Brownfield associate.

APPENDIX I

Figure 1 – Site Plan with Restricted Use Area
Figure 2A-1 – Building A-1 Active SSDS Design
Figure 2A-2 – Building A-2 Passive SSDS Design
Figure 2B – Building B Active SSDS Design
Figure 2C – Building C Passive SSDS Design
Figure 2D – Building D Passive SSDS Design
Figure 2E – Building E Passive SSDS Design

Landscaped Areas with >24" of Clean Soil*

Green – Building A2 Area; Unrestricted Use

Red - Restricted Use Zone; Non-Residential Use Only

Blue - Parcel Legal Boundary

Property Marker Locations

GRAPHIC SCALE

30 0 15 30 60 120

LARKIN OWNER, LLC
519 Memorial Drive Property
Atlanta, Fulton County, Georgia
NOVA Project Number 3015116

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FIGURE 1
SITE MAP WITH RESTRICTED USE AREA

SOURCE: Ebely & Associates, Inc. Layout & Staking Plan Sheet C3.0
SCALE: As Shown

* Other areas within the Restricted Use Zone Capped with Concrete/Asphalt.

SSDS = Sub-Slab Depressurization System

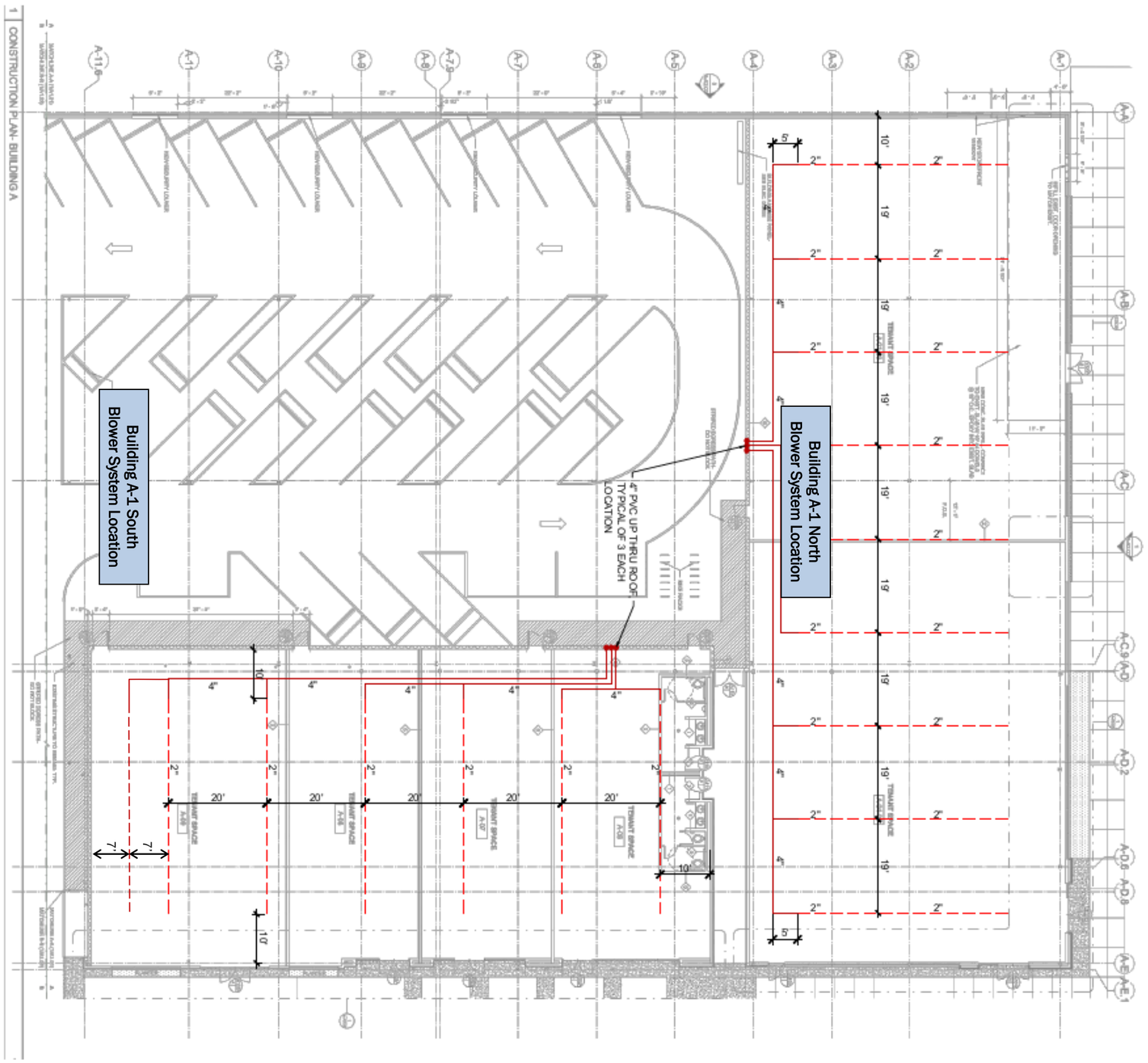

FIGURE 2A-1
BUILDING A-1 ACTIVE SSDS DESIGN

SOURCE: Construction Plan-Building A-1, October 28, 2015
SCALE: Not to Scale

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Atlanta, Fulton County, Georgia
NOVA Project Number 3015116

1 | CONSTRUCTION PLAN- BUILDING A-2

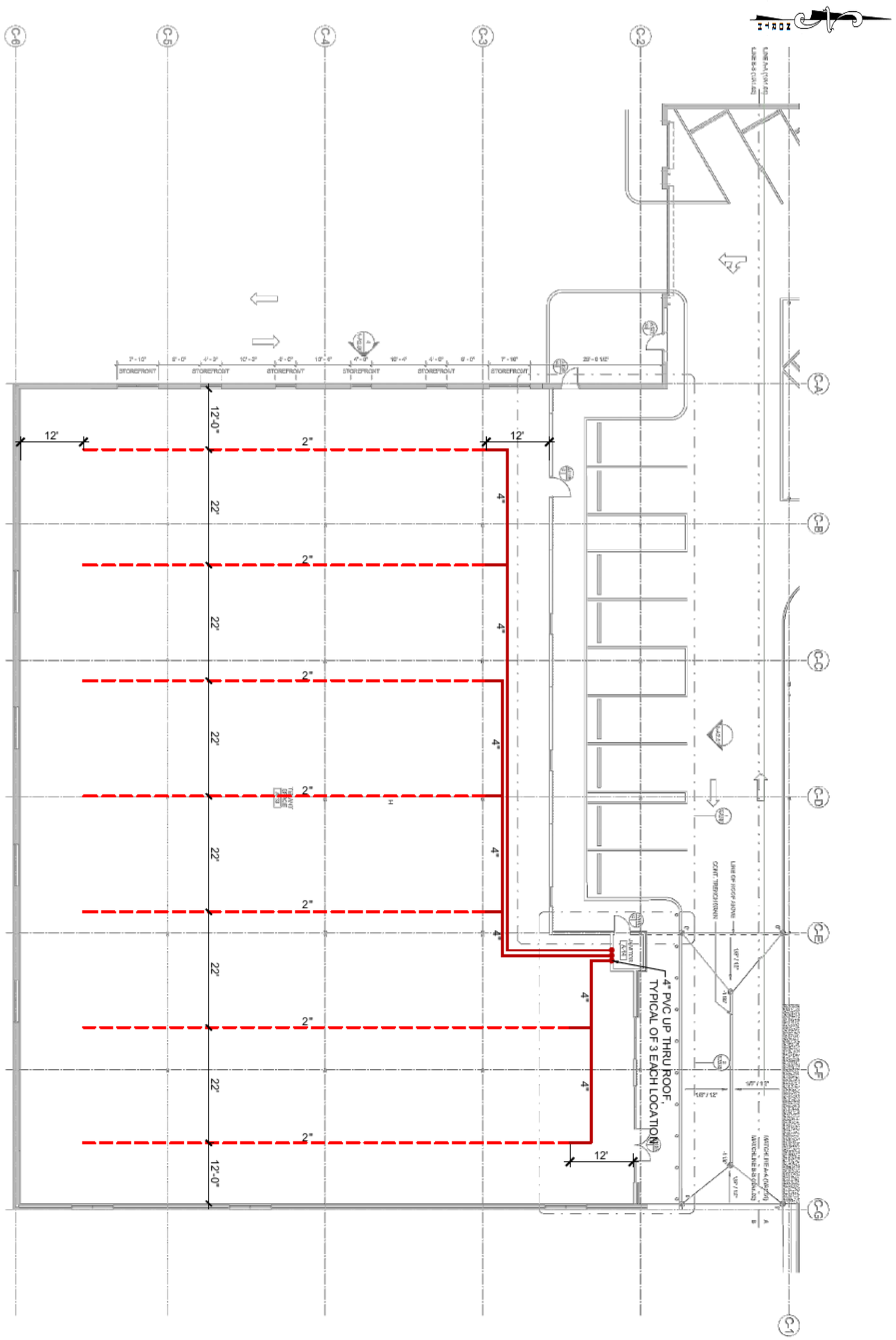

FIGURE 2A-2
BUILDING A-2 PASSIVE SSDS DESIGN

SOURCE: Construction Plan-Building A-2, October 28, 2015
SCALE: Not to Scale

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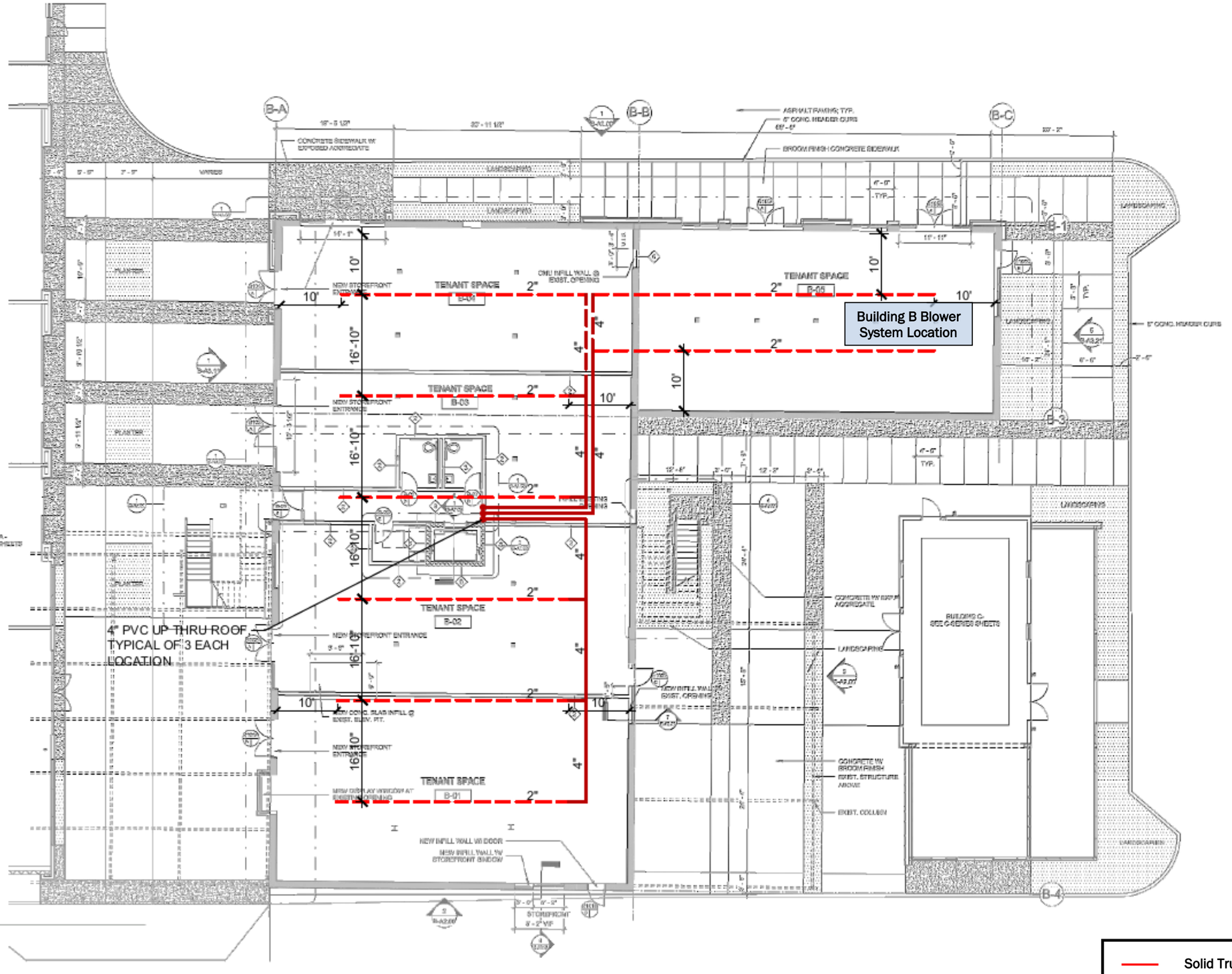

1 | CONSTRUCTION PLAN- BUILDING B, LEVEL 1

LARKIN OWNER, LLC
519 Memorial Drive Property
Atlanta, Fulton County, Georgia
NOVA Project Number 3015116

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FIGURE 2B
BUILDING B ACTIVE SSDS DESIGN

SOURCE: Construction Plan-Building B, Level 1, October 28, 2015
SCALE: Not to Scale

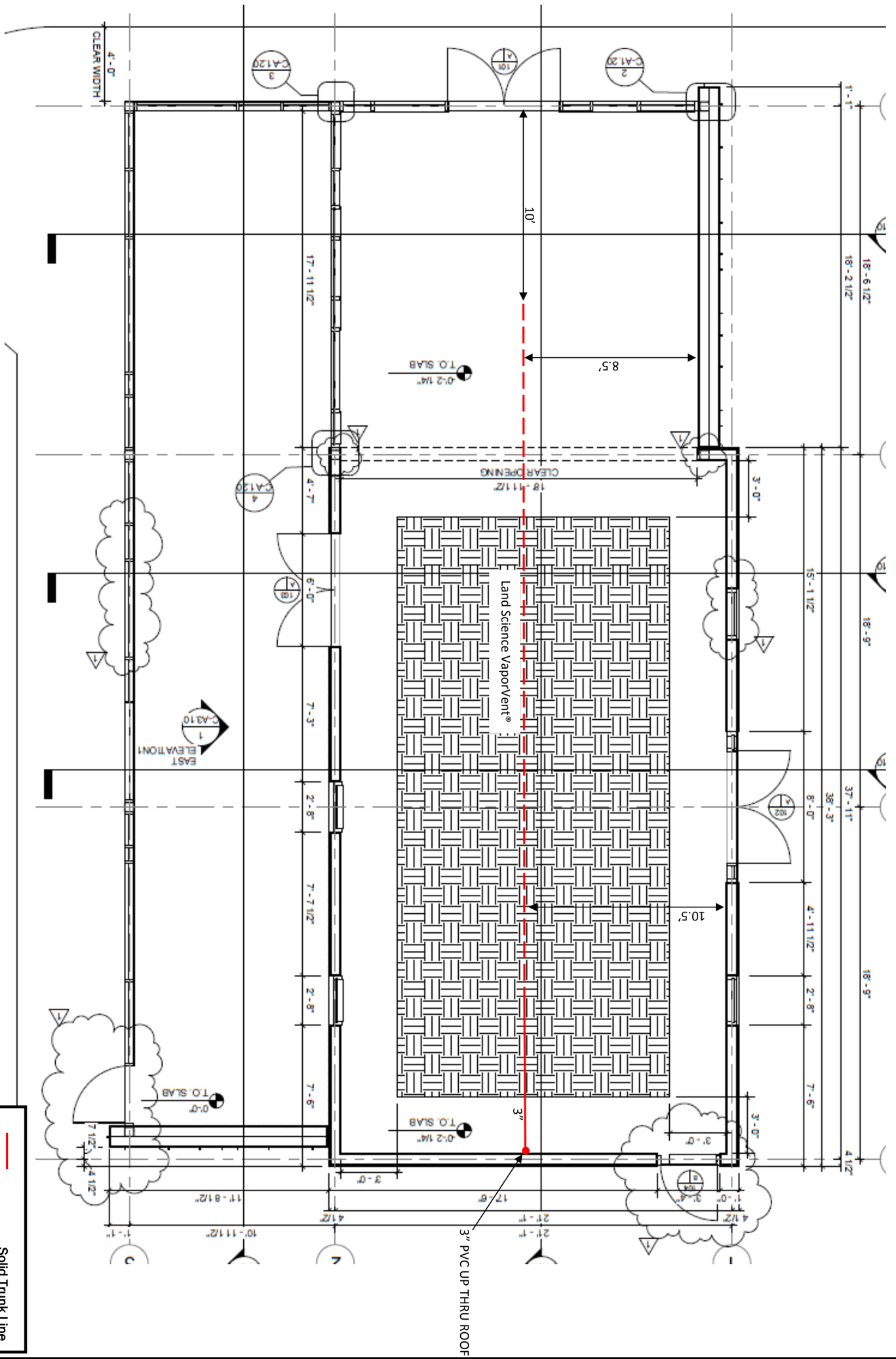

FIGURE 2C
BUILDING C PASSIVE SSDS DESIGN

SOURCE: Construction Plan-Building B, Level 1, October 28, 2015
SCALE: Not to Scale

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Atlanta, Fulton County, Georgia
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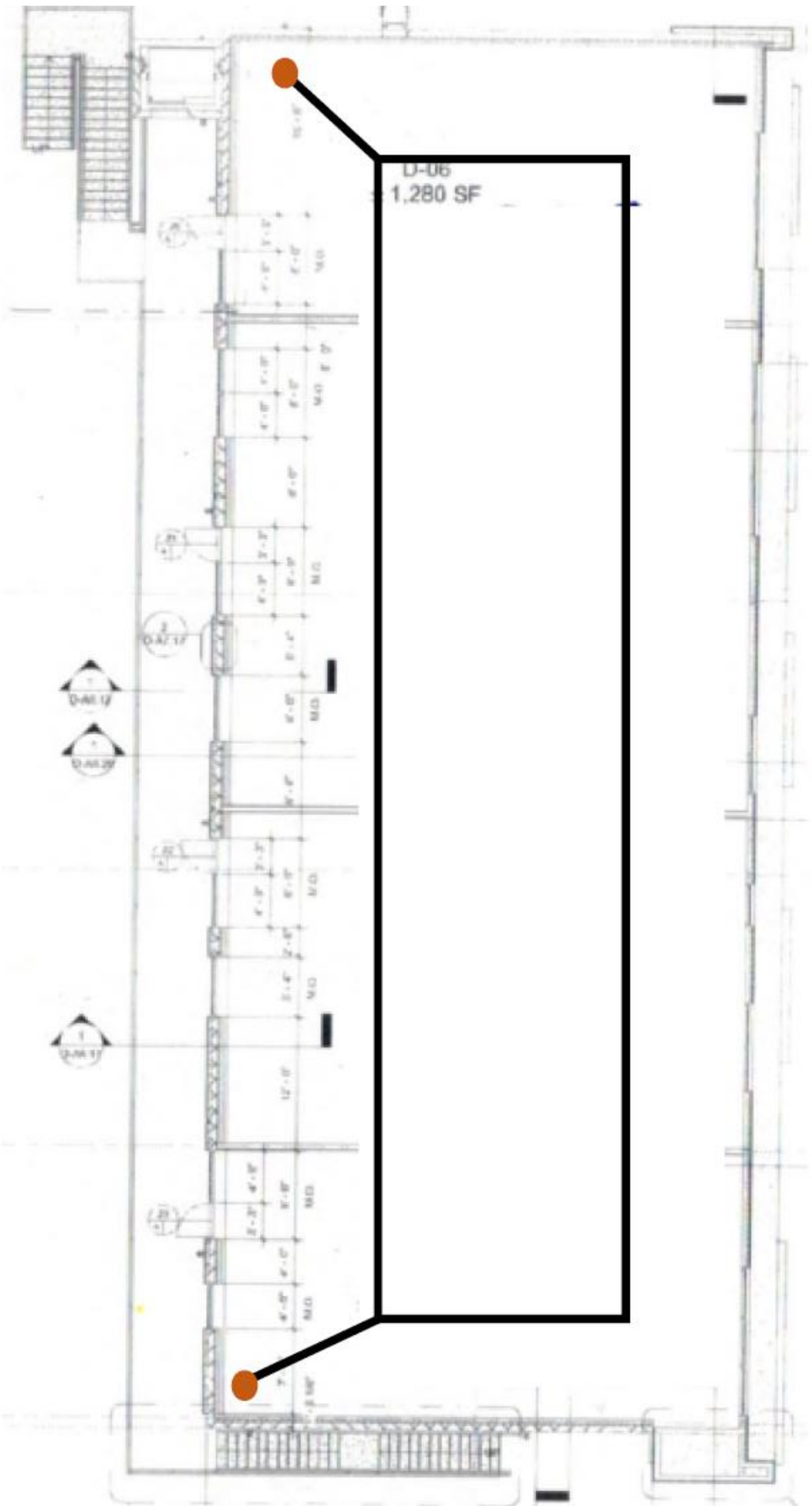

Riser Location

Slotted Vent Line

FIGURE 2D
BUILDING D PASSIVE SSDS DESIGN
PREPARED BY S&H WATERPROOFING, LLC

SOURCE: Unknown
SCALE: Not to Scale

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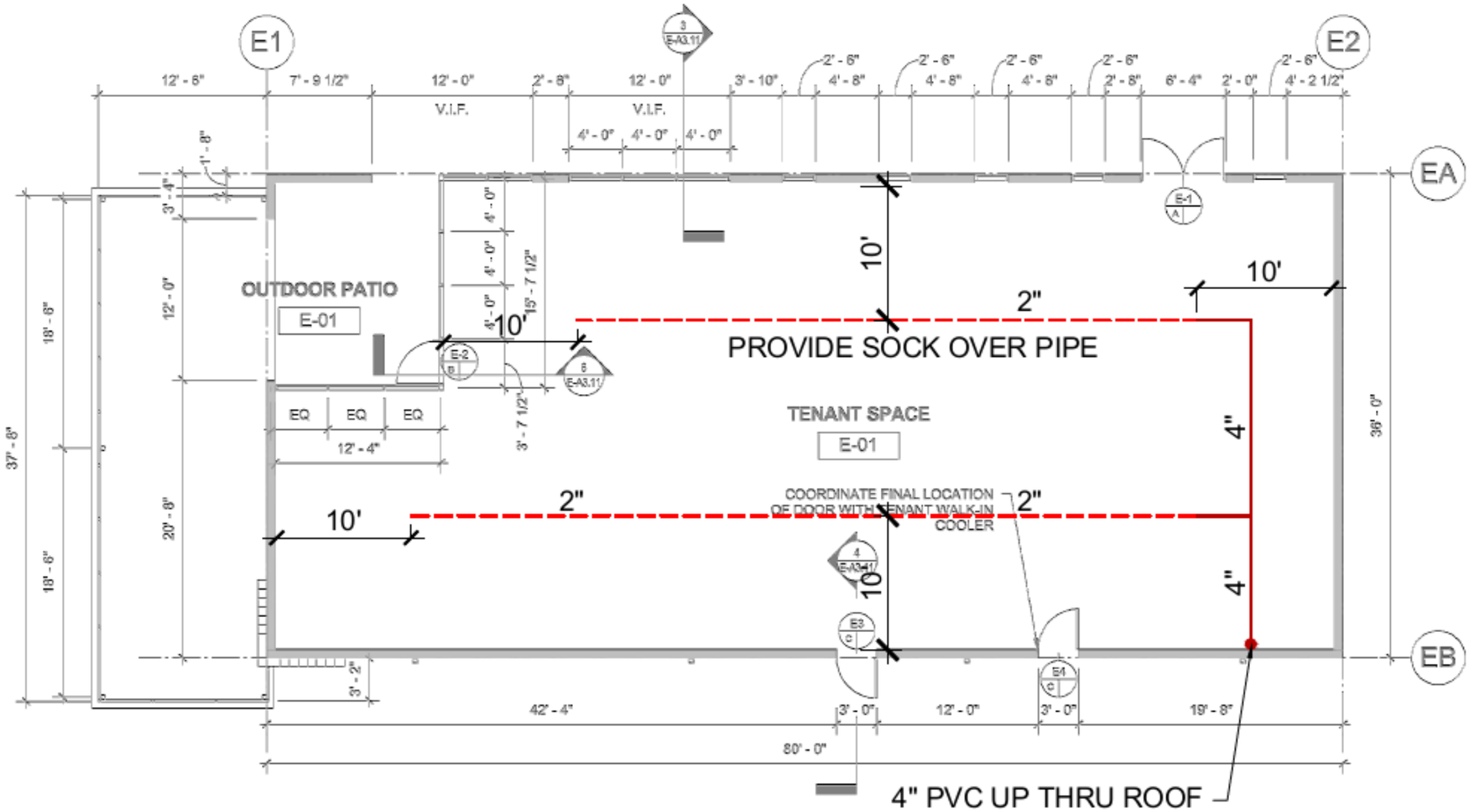
519 Memorial Drive Property
Atlanta, Fulton County, Georgia
NOVA Project Number 3015116



1 | CONSTRUCTION PLAN- BUILDING E

LARKIN OWNER, LLC
519 Memorial Drive Property
Atlanta, Fulton County, Georgia
NOVA Project Number 3015116

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FIGURE 2E
BUILDING E PASSIVE SSDS DESIGN
SOURCE: Floor Plan & Elevations-Building E, October 28, 2015
SCALE: Not to Scale

APPENDIX II

Annual Inspection Log Form
Weekly Inspection Log Form
Property Marker - inscription

519 MEMORIAL DRIVE ANNUAL INSPECTION LOG

Prior to the inspection, the inspector has reviewed the previous year's Weekly Inspection Logs and discussed VIMS maintenance, repair, and operational history with the Property Management. _____Yes, _____No

Inspected Area	Mark Yes(Y) or No (N)	Does this item require repair or attention? (Include note if needed)	Location of item requiring repair or attention	Date of correction & Action Taken
VIMS Inspection – Building A1-North, Active System				
Any signs of floor penetrations of interior of Building/Structure?				
Any damage of exposed/visible/ accessible collection/vent piping				
Are vent system blower(s) operating and in good condition?				
Are roof exit points open and obstruction free?				
VIMS Inspection – Building A1-South, Active System				
Any signs of floor penetrations of interior of Building/Structure?				
Any damage of exposed/visible/ accessible collection/vent piping				
Are vent system blower(s) operating and in good condition?				
Are roof exit points open and obstruction free?				
VIMS Inspection – Building B, Active System				
Any signs of floor penetrations of interior of Building/Structure?				
Any damage of exposed/visible/ accessible collection/vent piping				
Are vent system blower(s) operating and in good condition?				
Are roof exit points open and obstruction free?				

519 MEMORIAL DRIVE ANNUAL INSPECTION LOG

Inspected Area	Mark Yes(Y) or No (N)	Does this item require repair or attention? (Include note if needed)	Location of item requiring repair or attention	Date of correction & Action Taken
VIMS Inspection – Building A2, Passive System				
Any signs of floor penetrations of interior of Building/Structure?				
Any damage of exposed/visible/ accessible collection/vent piping				
Are roof exit points open and obstruction free?				
VIMS Inspection – Building C, Passive System				
Any signs of floor penetrations of interior of Building/Structure?				
Any damage of exposed/visible/ accessible collection/vent piping				
Are roof exit points open and obstruction free?				
VIMS Inspection – Building D, Passive System				
Any signs of floor penetrations of interior of Building/Structure?				
Any damage of exposed/visible/ accessible collection/vent piping				
Are roof exit points open and obstruction free?				
VIMS Inspection – Building E, Passive System				
Any signs of floor penetrations of interior of Building/Structure?				
Any damage of exposed/visible/ accessible collection/vent piping				
Are roof exit points open and obstruction free?				

519 MEMORIAL DRIVE ANNUAL INSPECTION LOG

Inspected Areas	Mark Yes (Y) or No (N)	Does the item require repair or attention? (Include note if needed)	Location of item requiring repair	Date of correction & Action Taken
Restricted Use Zone				
Potholes?				
Washout/erosion at the ground surface?				
Damage to structures that expose underlying soil?				
Large cracks or holes that expose underlying soil?				
Landscaped island undisturbed?				
Property markers in good condition and in-tact?				
Entire Property				
Groundwater use restricted?				
No residential activity within the RUZ?				
Active VIMS ?				

Additional notes:

Inspected by (Signature): _____

Inspected by (Name): _____

Date: _____

Phone #: _____

519 MEMORIAL DRIVE MAINTENANCE WORKER WEEKLY INSPECTION LOG

WEEK	DATE	VIMS BLOWERS OPPERATING? Blowers only installed on Buildings A1-North, A1-South, and B.	BUILDING FLOOR/ VAPOR BARRIER INTACT? All Buildings	INSPECTED BY
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
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38				

519 MEMORIAL DRIVE MAINTENANCE WORKER WEEKLY INSPECTION LOG

WEEK	DATE	VIMS BLOWERS OPPERATING? Blowers only installed on Buildings A1-North, A1-South, and B.	BUILDING FLOOR/ VAPOR BARRIER INTACT? All Buildings	INSPECTED BY
39				
40				
41				
42				
43				
44				
45				
46				
47				
48				
49				
50				
51				
52				

EXAMPLE OF PROPERTY MARKER STATEMENT

RESTRICTED AREA

SUBSURFACE SOIL AND GROUNDWATER SUBJECT TO ENVIRONMENTAL COVENANT

CONTACT THE ON-SITE PROPERTY MANAGER PRIOR TO DIGGING OR COMMENCING LAND DISTURBING ACTIVITY

ADDITIONAL INFORMATION MAY BE OBTAINED BY CONTACTING THE GEORGIA ENVIRONMENTAL PROTECTION DIVISION - BROWNFIELD PROGRAM

APPENDIX III

Transcribe "Annual Inspection and Certification Report" – Template

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TEMPLATE

[Date]

Georgia Department of Natural Resources
EPD – Land Protection Branch, Brownfield Unit
2 Martin Luther King, Jr. Drive, SE
Suite 1054, East Tower
Atlanta, Georgia 30334

Subject: **Annual Inspection and Certification Report**
519 Memorial Drive SE (former LCI and Veterans Radiator facilities)
Atlanta, Fulton County, Georgia

This document, with attachments, serves as the Annual Inspection and Certification Report for the Larkin Owner, LLC property located at 519 Memorial Drive SE in Atlanta, Fulton County, Georgia (Subject Property).

The Subject Property is in compliance, as follows:

- The Vapor Intrusion Mitigation System (VIMS), inclusive of concrete sub-slab/floor, installed in each of the enclosed buildings/structures on the Subject Property remains in good condition and continue to operate as designed.
- The external cap (concrete, asphalt, and landscaped areas) covering the Restricted Use Zone (RUZ) continues to remain secure and intact.
- There continues to be no use of groundwater at the Subject Property.
- The RUZ continues to be used only for non-residential purposes.

Certification

I certify under the law that this document and all attachments were prepared under my direction and 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 site, 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 it is illegal and there are significant penalties for submitting false information to a State agency of Georgia.

_____
Authorized Signature

If you have any questions, please contact me.
Sincerely,
[Name and title]
[Address]
[Phone]
[Email Address]

Attachments: Annual Inspection Log