

**MONITORING AND  
MAINTENANCE PLAN  
FOR TYPE 5  
RISK REDUCTION STANDARDS  
(REVISION 2)**

**1237 Gordon Highway  
Augusta, Richmond County, Georgia**

**Tax Parcel: 0600004000  
Richmond County, Georgia**

**August 7, 2017 (Revision 1)  
November 2, 2020 (Revision 2)**

**Prepared For:**

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**Submitted by:**

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## 1.0 INTRODUCTION

The 1237 Gordon Highway Property (aka “McTeer Food & Fuel Site” or “Property”) is a 1.96-acre commercial property located at 1237 Gordon Highway, Augusta, Richmond County, Georgia. The Property is enrolled in the Georgia Brownfields Program in accordance with O.C.G.A. 12-8-200. The Property is listed on the Hazardous Site Inventory (HSI) as Site No. 10916.

A Prospective Purchaser Corrective Action Plan (PPCAP) Amendment for the Property was approved by the Georgia Environmental Protection Division (EPD) on April 7, 2017. The PPCAP Amendment outlined the use of an engineering control (i.e., improved asphalt cover) and institutional control (i.e., environmental covenant) to address historic fill at the Property containing lead concentrations not meeting Type 1 through Type 4 soil Risk Reduction Standards (RRS). The corrective action encompasses maintenance of the buildings and other impervious surfaces for compliance with the Type 5 RRS and establishes an Environmental Covenant that prohibits the use of groundwater at the Property for any purpose, other than environmental investigations.

Note that this MMP is a stand-alone document and may only be amended in coordination with EPD to accommodate site changes.

## 2.0 MAINTENANCE AND INSPECTION PLAN

This section of the MMP describes the methods, procedures, and processes that should be used to inspect and maintain the engineering controls at the Property. Use of the Property must not damage the integrity of the improved asphalt cap or granite markers. Any intrusive activities at the Property must be performed by personnel with appropriate HAZWOPER training per OSHA's Hazardous Waste Operations and Emergency Response Standard 29 CFR 1910.120, and perform the work in accordance with a Health and Safety Plan prepared by a qualified safety professional.

Maintenance and inspection of the asphalt cover and granite markers must be performed by person(s) experienced in the maintenance and inspection of the engineering controls at the Property through both professional training and educational experience sufficient to evaluate the condition of the Property as it relates to the requirements set forth below.

Maintenance and inspection activity documentation includes the Annual Monitoring and Maintenance Log and Incident/Maintenance Record forms found in **Appendix A**. Inspection logs must include the date of the inspection, name of the inspector(s), weather conditions, and condition of the asphalt cover, with notation of any damages requiring attention and an indication if the noted damage would be classified as “Major Damage”. For the purpose of this MMP, “Major Damage” of the asphalt cover is defined as cracks extending through the depth of the asphalt and failure of the asphalt seal such that surface water comes in contact with contaminated soil or that causes direct exposure (i.e., direct ingestion, inhalation, and/or dermal adsorption) to contaminated soil. “Major Damage” of the granite markers is defined as crushed, broken, or defaced markers making markers unreadable; markers removed from the Property; and/or damage

to asphalt cover, such that the marker can be removed.

### **3.0 ENGINEERING CONTROLS**

#### **3.1 Improved Asphalt Cover**

The Property is covered with an improved layer of asphalt. It is necessary to maintain the integrity and effectiveness of the asphalt cover to avoid cracks extending through the depth of the asphalt cover, such that surface water comes in contact with impacted soil (i.e., "Major Damage").

The improved asphalt cover will be assessed on an annual basis for signs of differential settlement, such as ponding or "sagging" of asphalt and cracking of asphalt and/or other signs of deterioration. Minor cracks in the asphalt will be addressed using an asphalt based seal coat. Areas with excessive cracking may be saw-cut and the asphalt section replaced.

The results of the annual inspection must be recorded on the Annual Monitoring and Maintenance Log provided in **Appendix A**. Any maintenance of the asphalt cover must be documented in the Incident/Maintenance Record Form form provided in **Appendix A**. If Major Damage is noted, repairs must be completed within sixty (60) days of discovery. All other items requiring repair must be completed within ninety (90) days of discovery. Repairs must be made in accordance with the good engineering practices and must be conducted by qualified personnel.

#### **3.2 Granite Markers**

Type 5 RRS requires that permanent markers be placed on each side of the Property delineating the restricted area. Permanent markers were installed at the Property in October 2017.

The structural integrity of the markers must be maintained to avoid crushed, broken, or defaced markers making markers unreadable; marker(s) removed from the Property; and/or damage to asphalt or concrete, such that the marker can be removed ("Major Damage"). The granite markers are to be inspected every calendar year. The results of the inspection must be recorded on the Annual Monitoring and Maintenance Log form in **Appendix A**. All maintenance of the granite markers must be documented in a logbook and on Incident/Maintenance Record forms. If Major Damage is noted, repairs must be completed within sixty (60) days of discovery. All other items requiring repair must be completed within ninety (90) days of discovery. Repairs must be made in accordance with good engineering practices and must be conducted by qualified personnel.

#### **3.3 Groundwater Use Restrictions**

The Property will be inspected to ensure that groundwater is not being used on the Property in accordance with the covenant. This will include ensuring that groundwater is not being withdrawn and that groundwater wells have not been installed for any purpose other than for environmental

investigations.

#### **4.0 PLANNED USES AND INTENTIONAL IMPROVEMENTS TO THE PROPERTY**

Any use of the Property must preserve the integrity and effectiveness of the Type 5 RRS engineering controls. The Property shall only be used for non-residential purposes. The Property must be inspected annually regarding the use of the Property. Use of the Property must remain non-residential unless a change in use is approved by the Director.

- The inspection must verify the use of the Property by owners, tenants, and other occupants to be consistent with non-residential use.
- All lease agreements, and other agreements concerning the use of the Property, including contracts and informal agreements, must be reviewed to ensure they are consistent with non-residential use.

The results of the inspection must be summarized in the Property Use Statement shown in **Section 6.2**. Any future changes in use of the Property that materially impacts the engineering controls must be approved by EPD in accordance with the Executed Environmental Covenant. The MMP must be reviewed and revised as appropriate.

The PPCAP will require amendment if the following situations arise:

1. Significant, intentional improvements to the Property, such as removal, modification, or addition to the following:
  - a. Granite markers,
  - b. Building foundations,
  - c. UST vaults such that contaminated soils are exposed, and
  - d. Asphalt cap.
2. Planned use of the Property from non-residential to residential.
3. If active remediation will be performed, such that the use of engineering and institutional controls would no longer be needed.

From time to time, it might become necessary to penetrate the paved and unpaved areas to perform non-emergency maintenance and utility work. A permit must be obtained from the Property Manager within 30 days of commencement of work. The permit should specify that the work will be performed in accordance with the procedures outlined in the MMP to prevent human exposure to contaminated soil. At a minimum, the permit should address the following:

- 1) All workers have been provided with a copy of the MMP and a Health and Safety Plan (HASP).
- 2) Ensure that the work will be performed in a manner that prevents infiltration and human exposure to contaminated soil,
- 3) Provisions for the removal of contaminated soil in accordance with applicable state and federal rules.
- 4) Backfilling with soils that are in compliance with applicable cleanup standards
- 5) Ensure than an environmental professional will be on-site during the work.
- 6) An incident Report

## **5.0 CONTINGENCY PLAN**

If an accidental breach of the asphalt cover occurs (where “breach” is defined as an opening or large crack in the asphalt that results in underlying soil becoming visible), the Property Manager will ensure within 48-hours of knowledge of the breach that-the affected area is temporarily covered with HDPE sheeting and cordoned off with traffic cones to minimize potential human exposure or rain infiltration. The Property Manager will then ensure the breach is repaired within a reasonable timeframe.

If the permanent granite markers are damaged, such that they cannot be easily read, the Property Manager must ensure repair within a reasonable timeframe.

Any extracted soil will be disposed of offsite in accordance with applicable local, state, and federal rules and regulations governing the disposal of such material.

Per EPD’s requirements, the Property Manager will report the breach of the asphalt cover and/or damage of granite markers to EPD within 10 business days of discovery using the Incident Report/Maintenance Record Form in Appendix A.

## **6.0 REPORTING**

### **6.1 Maintenance and Inspection Report**

A Maintenance and Inspection Report must be submitted to EPD annually by August 1st of each calendar year. Maintenance and Inspection Log Reports will be kept in the office of the Property Manager for a minimum of three (3) years. The Maintenance and Inspection Report must include the following:

- a. A cover letter that includes the name, mailing address, telephone number, and e-mail of the person EPD should contact regarding the requirements associated with the Property, and the following signed statements:

“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 that 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 and accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.”

\_\_\_\_\_  
Authorized Representative

“I certify that I am a qualified engineer/geologist who has received a baccalaureate or postgraduate degree in engineering/geology, and have sufficient training and experience in designing and/or evaluating caps, as demonstrated by State registration and completion of accredited university courses, that enable me to make sound professional judgment regarding the effectiveness of engineering controls at this site. I also certify that this report meets the requirements set forth in the Monitoring and Maintenance Plan for the site. I further certify that this report was prepared by myself or by a subordinate working under my direction”

\_\_\_\_\_  
Qualified Engineer/Geologist

- b. The Annual Monitoring and Maintenance Log (see **Appendix A**);
- c. The Incident/Maintenance Record Form (see **Appendix A**);
- d. The Land Use Certification Form (see **Appendix A**); and
- e. The signed Property Use Statement (see **Section 6.2**).

## **6.2 Property Use Statement**

A Property Use Statement regarding compliance with the non-residential use of the Property must be submitted to EPD annually by August 1<sup>st</sup> with the annual maintenance and inspection report (refer to previous **Section 6.1**)

The property use statement must include the following signed 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 that 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 fines and imprisonment for knowing violations.”*

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Authorized Representative

The Property Use Statement must also provide as an attachment the “Land Use Certification Form” found in **Appendix A** of this document.



# **APPENDIX A**

Annual Monitoring and Maintenance Log  
Incident Report/Maintenance Record Form  
Land Use Certification Form

**Annual Monitoring and Maintenance Log**

(Annual Monitoring and Maintenance Log must be submitted to EPD by August 1<sup>st</sup> of each calendar year)

		Yes	No	NA	Recommendations for addressing condition of component
Building Area	<ul style="list-style-type: none"> <li>Are site buildings present at the locations indicated on the attached map?</li> </ul> <p>If no, was a CAP amendment submitted to EPD describing the measures to maintain the building foundations and control exposure to contaminated soil and infiltration of precipitation?</p> <ul style="list-style-type: none"> <li>Are there obvious (i.e. cracks in walls, cracks in foundations) and observable indications of conditions that would prevent the existing buildings from prohibiting direct exposure to underlying soil or that would allow infiltration of precipitation?</li> </ul> <p>If yes, then make recommendations to Property Management on the necessary repairs.</p> <ul style="list-style-type: none"> <li>If the buildings were demolished in accordance with an approved CAP Amendment, are the remaining foundations free of obvious and observable cracks, openings, or other conduits for infiltration of precipitation or exposure to soil?</li> </ul> <p>If no, then make recommendations to Property Management on the necessary repairs.</p>				
	<ul style="list-style-type: none"> <li>Are site USTs present at the locations indicated on the attached map?</li> </ul> <p>If no, please confirm USTs were managed in accordance with rules from UST management.</p> <ul style="list-style-type: none"> <li>If the USTs were removed accordance with rules from UST management, are the remaining foundations free of obvious and observable cracks, openings, or other conduits for infiltration of precipitation or exposure to soil?</li> </ul> <p>If no, then make recommendations to Property Management on the necessary repairs.</p>				
UST					

Asphalt Cover	<ul style="list-style-type: none"> <li>• Is the asphalt cover still present on the property?</li> <li>• Is the asphalt cover free of obvious and observable cracks, openings, or other potential conduits for infiltration or precipitation or exposure to soil?</li> </ul> <p>If no, provide Property Management with recommendations for repair.</p>				
Contingency Plan	<ul style="list-style-type: none"> <li>• Have any of the engineered controls been breached such that the procedures of the Contingency Plan were activated?</li> <li>• If so, were the repairs performed in accordance with the Contingency Plan?</li> <li>• If the procedures of the Contingency Plan were activated, was an incident report sent to EPD?</li> </ul>				
Groundwater	<ul style="list-style-type: none"> <li>• Have any wells (monitoring, drinking water, irrigation, heat-pump, etc.) been installed on the property?</li> <li>• Is groundwater being used for any purpose, other than environmental investigations, on the property?</li> </ul> <p>If yes, cease and desist water use immediately and provide property management with recommendations for proper well closure.</p>				
Review with Property Management	<ul style="list-style-type: none"> <li>• Has the previous years Annual Report been reviewed with Property Management to evaluate how recommendations for repairs have been implemented?</li> </ul> <p>If no, provide written explanation</p>				

*"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 that 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 and accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.”*

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Authorized Signature (Property Manager)

*“I certify that I am a qualified engineer/geologist who has received a baccalaureate or post- graduate degree in engineering/geology, and have sufficient training and experience in designing and/or evaluating caps, as demonstrated by State registration and completion of accredited university courses, that enable me to make sound professional judgment regarding the effectiveness of engineering controls at this site. I also certify that this report meets the requirements set forth in the Monitoring and Maintenance Plan for the site. I further certify that this report was prepared by myself or by a subordinate working under my direction”*

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Qualified Engineer/Geologist

## INCIDENT REPORT/MAINTENANCE RECORD FORM

**Property Name:** 1237 Gordon Highway

**Date/Time:** \_\_\_\_\_

**Weather:** \_\_\_\_\_

**Inspector:** \_\_\_\_\_

Component Inspected	Repair Dates		Inspector(s)	Repair Description	Check if Major Damage	Additional Recommendations to address the condition of component
	Initiated	Completed				
Asphalt Cover						
Granite Markers						

“Major Damage” of the asphalt cover at this Property is defined as cracks extending through the depth of the asphalt and failure of the asphalt seal such that surface water comes in contact with contaminated soil or there is potential for human exposure. “Major Damage” of the granite markers is defined as crushed, broken, or defaced markers making markers unreadable; markers removed from the Property; and/or damage to asphalt cover, such that the marker can be removed.

**Notes/Comments:**

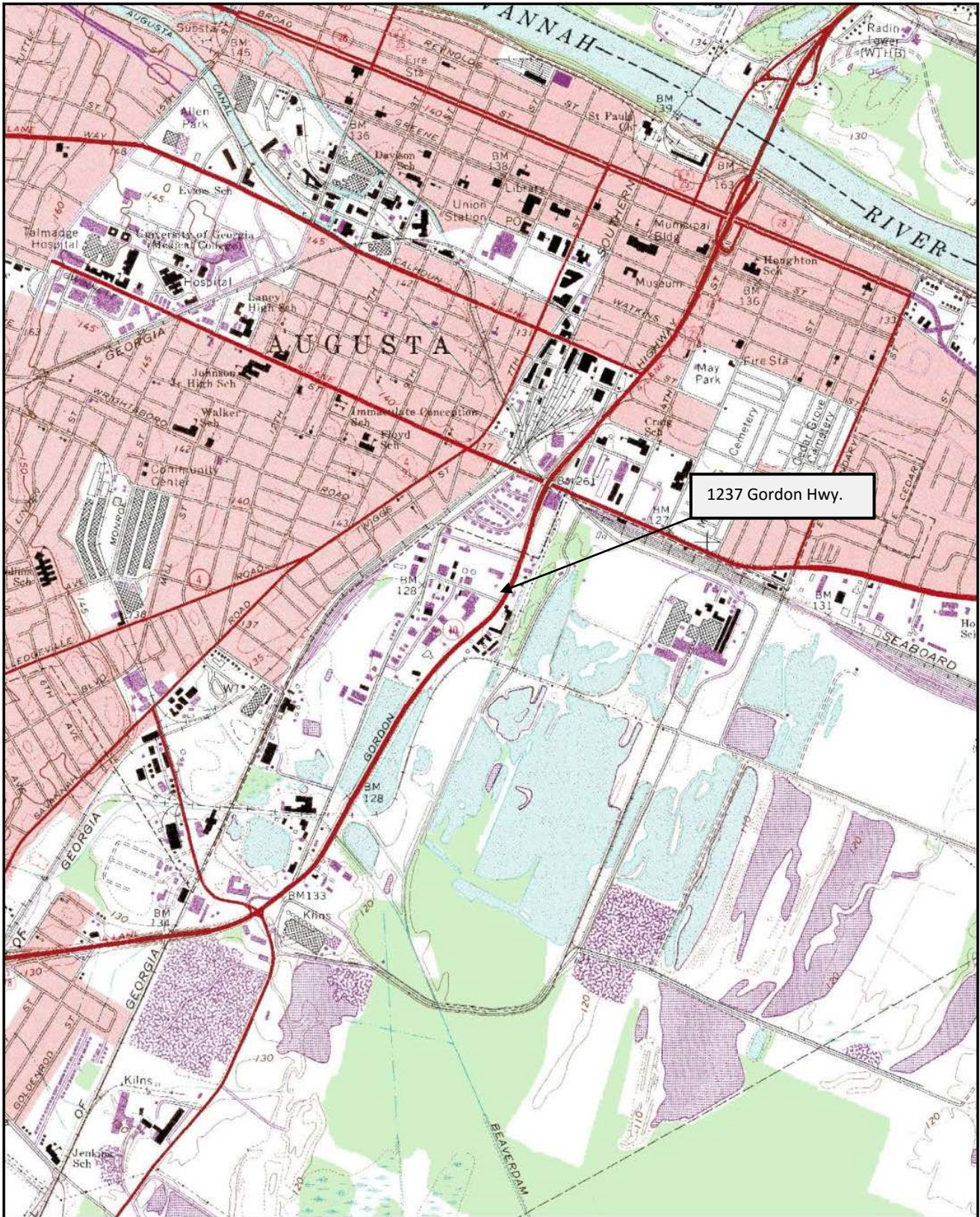
This Maintenance Record Form was prepared in accordance with the requirements and obligations in the Monitoring and Maintenance Plan for the Property.

\_\_\_\_\_  
 Qualified Engineer/Geologist

**LAND USE CERTIFICATION FORM**  
**McTeer Food & Fuel - HSI No. 10916**

TYPE	No.	CRITERIA RESPONSE	YES	NO
Land Use	1.	<p>Does this property meet the definition of a non-residential property as defined in HSRA Rule 391-3-19.02(2)?</p> <p><i>"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 groups."</i></p>		
	1a.	If no to 1, attach a written explanation to this form.		
Exposure	2.	Has excavation, construction, utility installation or maintenance, or similar land disturbing activities been conducted at the Property within the last year? If yes, provide written explanation.		
	2a.	Was the work performed using appropriate personal protection equipment (PPE)? If no, provide written explanation.		
Institutional Controls	3.	Do all leases or other property instruments for the Property have the applicable deed notice language inserted into them?		
	3a.	If no to 3, attach a written explanation to this form.		
Inspection	4.	Date of Inspection and Name of Inspector:		
	4a.	Photographs showing current land use (attached). Photos should include condition of asphalt, granite markers, and buildings.		

# **APPENDIX B**



AECS  
 American Environmental &  
 Construction Services, Inc.



Figure 1  
 Topographic Property Location Map  
 McTeer Fuel  
 1237 Gordon Highway Property  
 Augusta, Richmond County, Georgia



Site Features Map  
MM&P (October 2020)  
Former McTeer Site  
1237 Gordon Highway  
August, GA






Permanent  
Marker

Improved  
Asphalt Cover

Permanent  
Marker

**Legend:**

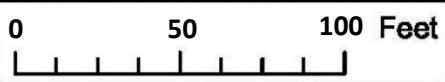
-  -Property Boundary
-  -Site Structures
-  -Markers


Canopy

UST

Building

Canopy



 American Environmental &  
Construction Services, Inc.  
Alpharetta, GA

Date: October 26, 2020  
Project No. 15-8  
Drawn By: SKB  
Checked By: CLW

Figure  
**2**

Imagery Date September 21, 2019

Photographic Log  
Type 5 – Asphalt Cover and Permanent Markers Installation – June 2017  
McTeer Food and Fuel – MMP – Appendix B

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Photographic Log  
Type 5 – Asphalt Cover and Permanent Markers Installation – June 2017  
McTeer Food and Fuel – MMP – Appendix B

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Photographic Log  
Type 5 – Asphalt Cover and Permanent Markers Installation – June 2017  
McTeer Food and Fuel – MMP – Appendix B

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Photographic Log  
Type 5 – Asphalt Cover and Permanent Markers Installation – June 2017  
McTeer Food and Fuel – MMP – Appendix B

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Photographic Log  
Type 5 – Asphalt Cover and Permanent Markers Installation – June 2017  
McTeer Food and Fuel – MMP – Appendix B

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