



Environment & Infrastructure Solutions
1075 Big Shanty Road, Suite 100
Kennesaw, Georgia 30144
USA

July 24, 2020

Mr. John Fonk
Unit Coordinator – Remedial Sites Unit
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive, SE
Suite 1054, East Tower
Atlanta, Georgia 30334

T: +11 770-421-3400

www.woodplc.com

Subject: **RCRA Part B Permit Renewal Application Sections for EPD Review
Former Xerox Facility, Atlanta, Georgia
EPA I.D. No. GAD010103232**

Dear Mr. Fonk:

On behalf of our client, Xerox Corporation, we are submitting for EPD review the attached section B, revised in accordance with our conference call of June 25, 2020, of the RCRA Part B Permit Renewal Application for the former Xerox CRC facility (EPA I.D. No. GAD010103232) located on Fulton Industrial Boulevard in Atlanta, Georgia. As discussed in our conference call of February 13, 2020, and letter of February 19, 2020, the document sections are being submitted to EPD for review and comment as each section is prepared, rather than as a full renewal application in late July. Xerox has reviewed and approved this section for transmittal to EPD for review.

Please call us if you have any questions concerning this submittal.

Sincerely,

Wood Environment & Infrastructure Solutions, Inc.

John M. Quinn, P.G.
Senior Geologist

A. David Alcott
Principal

Attachment

cc: Marcus Lathrop – Xerox Corporation



SECTION B - FACILITY DESCRIPTION

This section provides a general description of the former Xerox Corporation Copier Refurbishing Center (CRC) facility located in Atlanta, Georgia as is required by 40 CFR 270.14 (b)(1). This description is intended to acquaint the reviewer/permit writer with an overview of the facility and its operation. The most recent facility permit, permit application, records of ongoing corrective action activities, and selected historical facility documents are maintained in a dedicated file at the offices of Xerox' consultant (Wood Environment & Infrastructure Solutions, Inc.) at 1075 Big Shanty Road NW, Suite 100, Kennesaw, Georgia 30144.

B-1 - General Description

The facility is a 28.9-acre site located at 6077 Fulton Industrial Boulevard in Atlanta, Georgia, as is indicated on Figure B-1. Figure B-2, presented on a topographic map base, illustrates facility features that include the plant building and the former tanks area. The property is located in an industrial area of Fulton County. The facility was constructed during 1972 and 1973. Electrical copiers were repaired, refurbished, and remanufactured at the facility from 1974 to 1983. Copiers were torn down, cleaned, repainted, and reassembled. As part of this operation, an aliphatic/chlorinated solvent blend (see Section C, Waste Characteristics for specific blend constituents) used to clean the copier parts was stored in two steel underground tanks (USTs) and piped underground to and from the point of use within the building. Copier repair, refurbishing, and remanufacturing operations ceased in 1983. A portion of the building is currently used for warehousing and redistribution of retail goods. The remainder is unoccupied. No hazardous chemicals are used nor are any hazardous wastes generated by the warehousing operation.

B-2 - Topographic Map

B-2.a General Requirements

Topographic maps of the facility and the surrounding property are provided on Figures B-1 and B-2. These figures show the hazardous waste unit (i.e., former tanks area with concrete cap) and surrounding areas. The plant building, structures, legal boundary lines, access control, and other geographic information are also shown on these figures.

The site is partially enclosed by a 6-foot high chain link fence. A portion of the building is currently used for warehousing and redistribution of retail goods. The remainder is unoccupied. No hazardous chemicals are used nor are any hazardous wastes generated by the warehousing operation.

The site is located in an industrialized area known as the Fulton Industrial Park. The industrial park is served by railroads, highways, and electric power. Major land use within a one-mile radius of the site is shown on Figure B-3. The major land use in the vicinity of the site is industrial. In the areas north and west of the site to the Chattahoochee River, land use is industrial. The industrial park includes manufacturing, warehousing, and commercial office buildings. As shown on Figure B-3, the closest residential area is located approximately 1,800

feet south of the site. Other land uses within a one-mile radius of the site include multi-family residential, transportation and utilities, and community services.

In an effort to maintain clarity of the facility maps, separate maps are provided as Figures B-4 and B-5 that illustrate the location of fire protection facilities and storm and sanitary sewers located on the property, respectively. Figure B-4 provides the latest available information relative to the fire protection system. The on-going monitoring and corrective actions being conducted by Xerox are at locations outside the building. All vehicles used by monitoring personnel carry portable fire extinguishers. Wastewater is discharged to the Fulton County sanitary sewer system; storm water discharges to the drainage ditch that parallels the western property boundary.

The wind rose provided on Figure B-6 is for Fulton County Airport-Brown Field, located approximately 2 miles southwest of the site.

The facility has no injection wells. The recovery wells that were part of the remediation system were abandoned in 2000. There are no known water supply wells within 1000 feet of the property lines.

B-2.b Additional Topographic Requirements

Figure B-2 and Figures E-2, E-3 and E-5a through E-5d, (in Section E of this application) combine to provide the following additional information:

- Delineation of the point of compliance (Figure B-2)
- Delineation of the waste management area (WMA) boundary (Figure B-2). The WMA is defined as the area of the former waste solvent tanks and the associated waste solvent piping.
- Ground-water monitoring (Figure B-2)
- Locations of uppermost aquifer and aquifers hydraulically inter-connected beneath the facility. This is discussed in Section E-2 and depicted on Figure E-2.
- Ground-water flow direction (Figure E-3)
- Delineation of extent of plume (Figure E-5a [residual soils], Figure E-5b [partially weathered rock], Figure E-5c [fractured rock] and Figure E-5d [deep rock])

Additional information on ground-water flow, aquifer definition, plume descriptions, etc. is discussed in Section E.

B-3 - Location Information

The former Xerox facility is located in unincorporated Fulton County, Georgia.

B-3.a Seismic Considerations

The county in which the site is located is not listed in Appendix VI of Part 264 and, accordingly, is not required to demonstrate compliance with seismic standards.

B-3.b Floodplain Standard

As is illustrated on Figure B-9, the Xerox facility is not located within the 100-year floodplain. Therefore, this subsection is not applicable.

B-4 - Traffic Information

A portion of the building is currently used for warehousing/redistribution of retail goods. On-site traffic associated with these operations consists of employee parking and commercial trucking. Trucks enter the site at the south entrance for access to the loading/unloading docks.

Except for multi-day sampling events, vehicles associated with conducting corrective action (groundwater monitoring and periodic inspection of the CAP and monitoring wells) are generally on site for no more than one day a month. Groundwater monitoring events generally require approximately 2 to 3 days and are conducted semi-annually.




It is noted that the hazardous waste management unit and the monitoring wells are located in grassed areas interior to the site and are not likely to be impacted by vehicular traffic.

Fulton Industrial Boulevard is a heavily traveled 4 to 6-lane road. The load bearing capacity of the on-site roads is adequate for equipment involved in corrective action activities. Paved roads on site are shown on Figure B-2.

FIGURES



Legend

-  2 Foot Contours
-  1000 ft Buffer of Site Boundary
-  Site Boundary

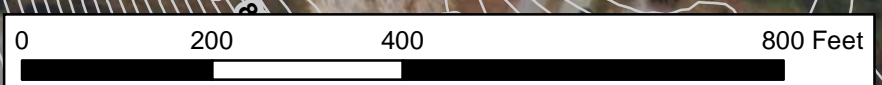
**Xerox Corporation, Fulton Industrial Park
Atlanta, Georgia**

**Topographic Map
of Site and Vicinity**

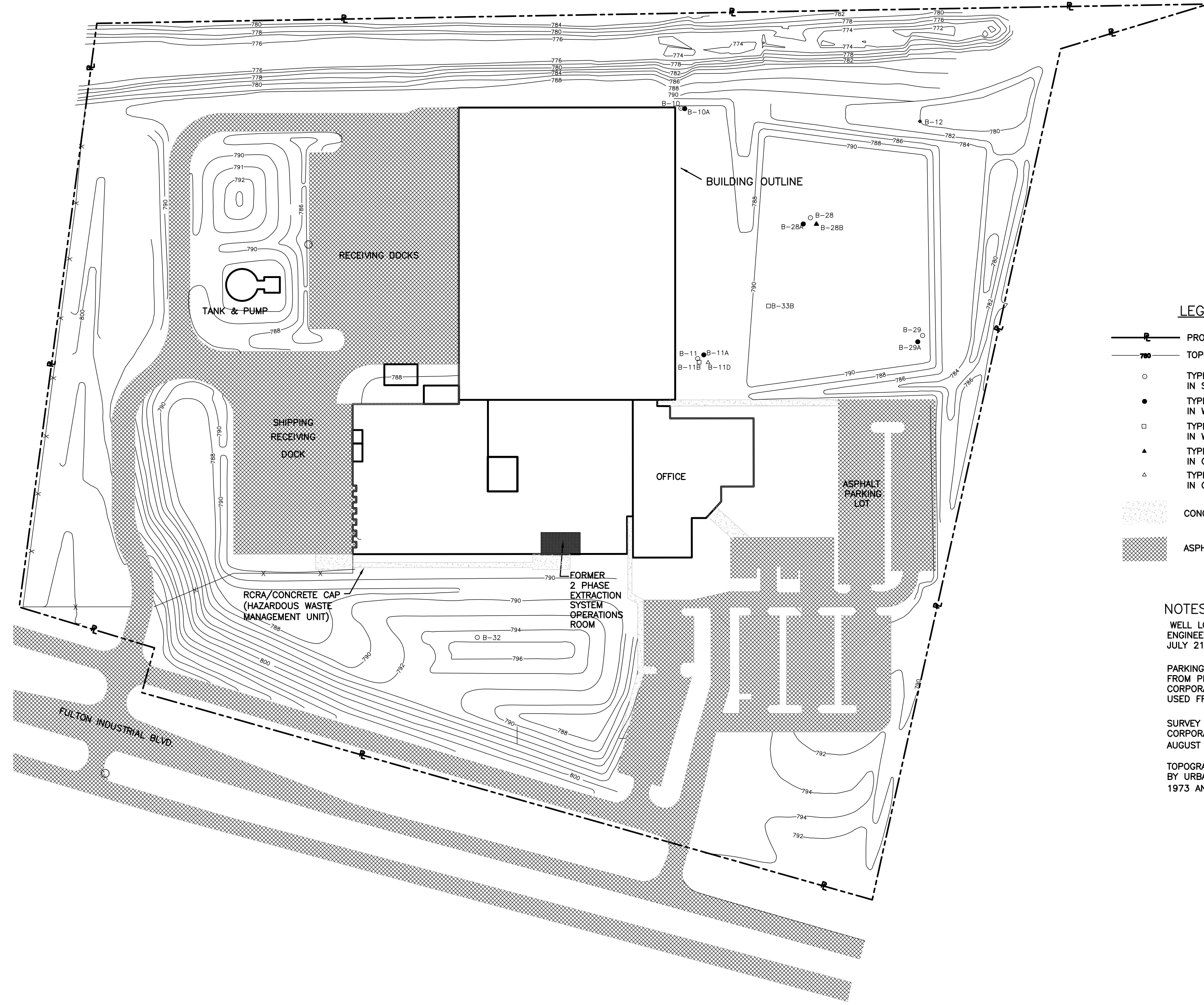
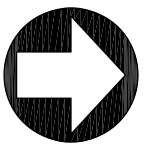
Prepared By-Date:
THP - 4/30/2020
Checked By-Date:
JMQ - 4/30/2020
Project Number:
6122110362



Figure
Number:
B-1



Source:
Imagery-USGS Seamless Data Distribution, Atlanta High Resolution Imagery 2008,
Contours-USGS Seamless Data Distribution, USGS Digital Elevation Model



- LEGEND**
- PROPERTY LINE
 - TOPOGRAPHIC CONTOUR
 - TYPE II MONITORING WELL - SCREENED IN SOIL
 - TYPE II MONITORING WELL - SCREENED IN WEATHERED ROCK
 - TYPE III MONITORING WELL - SCREENED IN WEATHERED ROCK
 - ▲ TYPE III MONITORING WELL - SCREENED IN COMPETENT ROCK
 - △ TYPE IV MONITORING WELL - SCREENED IN COMPETENT ROCK
 - CONCRETE
 - ASPHALT PAVED AREA

NOTES:

WELL LOCATIONS SURVEYED BY LOWE ENGINEERS, INC. JANUARY 6-15, 1988
JULY 21, 1988 AND AUGUST 30, 1988

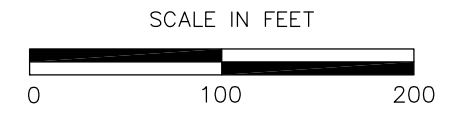
PARKING LOT AND DRIVE LAYOUT TAKEN FROM PLANS SUPPLIED BY XEROX CORPORATION MAGNETIC BEARING ALSO USED FROM XEROX PLANS

SURVEY OF PROPERTY FOR XEROX CORPORATION BY URBAN ENGINEERS, INC. AUGUST 27, 1973

TOPOGRAPHIC MAP FOR XEROX CORPORATION BY URBAN ENGINEERS, INC. SEPTEMBER 4, 1973 AND BY W.L. JORDAN, INC.

GROUND-WATER MONITORING WELLS INSTALLED TO DEFINE THE POINT OF COMPLIANCE: B-11, B-11A, B-11B, B-11D.

THE WASTE MANAGEMENT AREA (WMA) INCLUDES THE FORMER WASTE SOLVENT TANKS AND THE ASSOCIATED PIPING; THE PORTION OF THE WMA LOCATED OUTSIDE OF THE BUILDING IS DELINEATED AS THE RCRA/CONCRETE CAP. THIS AREA HAS BEEN DESIGNATED AS AN HAZARDOUS WASTE MANAGEMENT UNIT.



XEROX CORPORATION
FULTON INDUSTRIAL PARK
ATLANTA, GEORGIA

wood. Environment & Infrastructure
Solutions, Inc.

1075 BIG SHANTY ROAD, NW, SUITE 100
KENNESAW, GEORGIA 30144 (770) 421-3400

SITE TOPOGRAPHIC MAP

JOB NO. 6122110362

FIGURE B-2










PREPARED BY/DATE
TG 4/27/2020
CHECKED BY/DATE
ADA 4/27/2020



Douglasville

South Fulton

Legend

-  Geopolitical Area
-  1 Mile Buffer of Site Boundary
-  Site Boundary
- Group**
-  Residential
-  Industrial
-  Commercial
-  County Owned
-  Utility
-  Unique Restricted Vacant Land

Xerox Corporation, Fulton Industrial Park
Atlanta, Georgia

Land Use Map



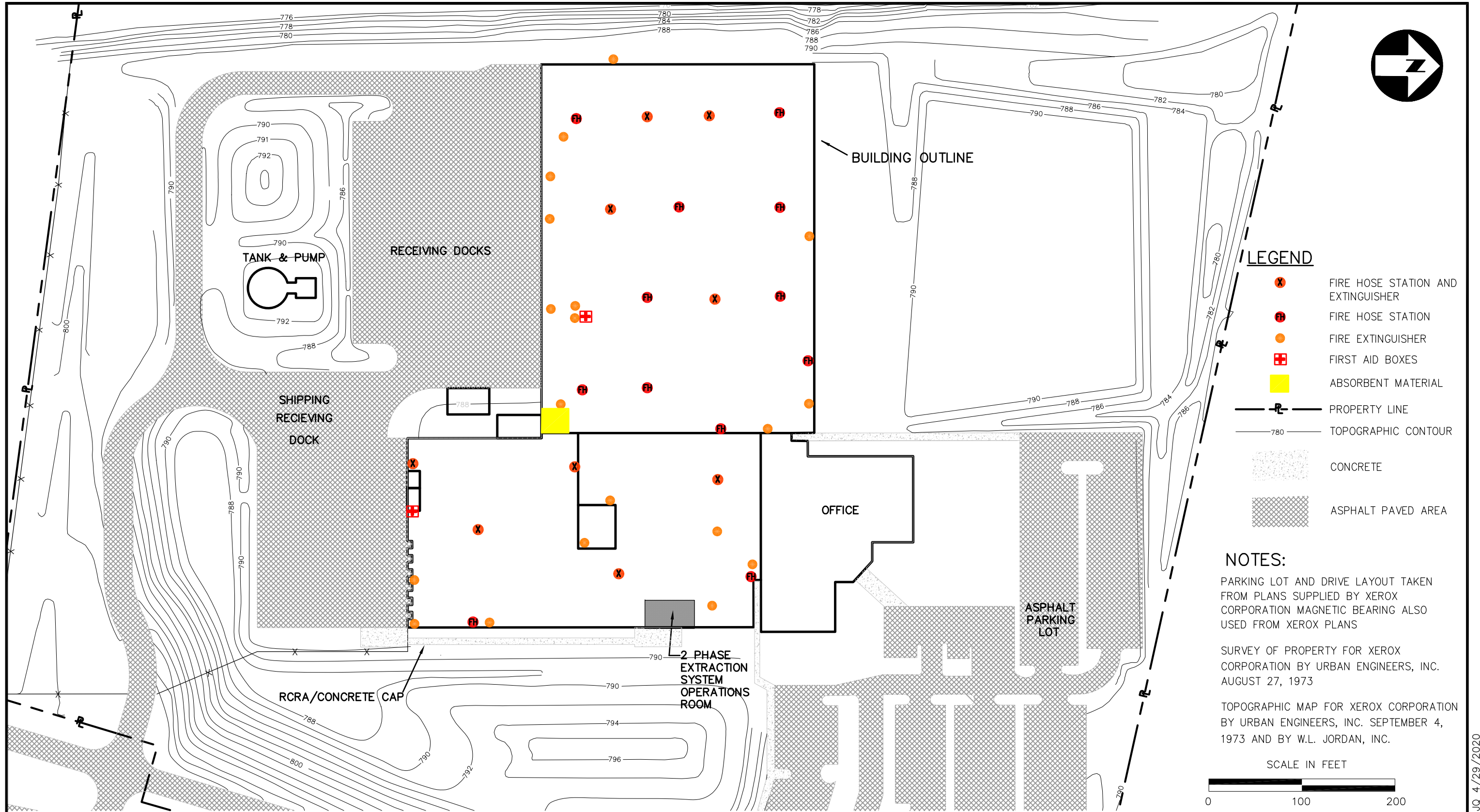
Figure Number:
B-3

0 500 1,000 2,000 Feet

Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar
Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the

Prepared By-Date:
JCD - 7/20/2020
Checked By-Date:
JMQ - 7/20/2020
Project Number:
6122110362

Map Document: G:\Xerox Fulton Ind Park\mxd\contours.mxd, 4/7/2010 -- 6:01:26 PM

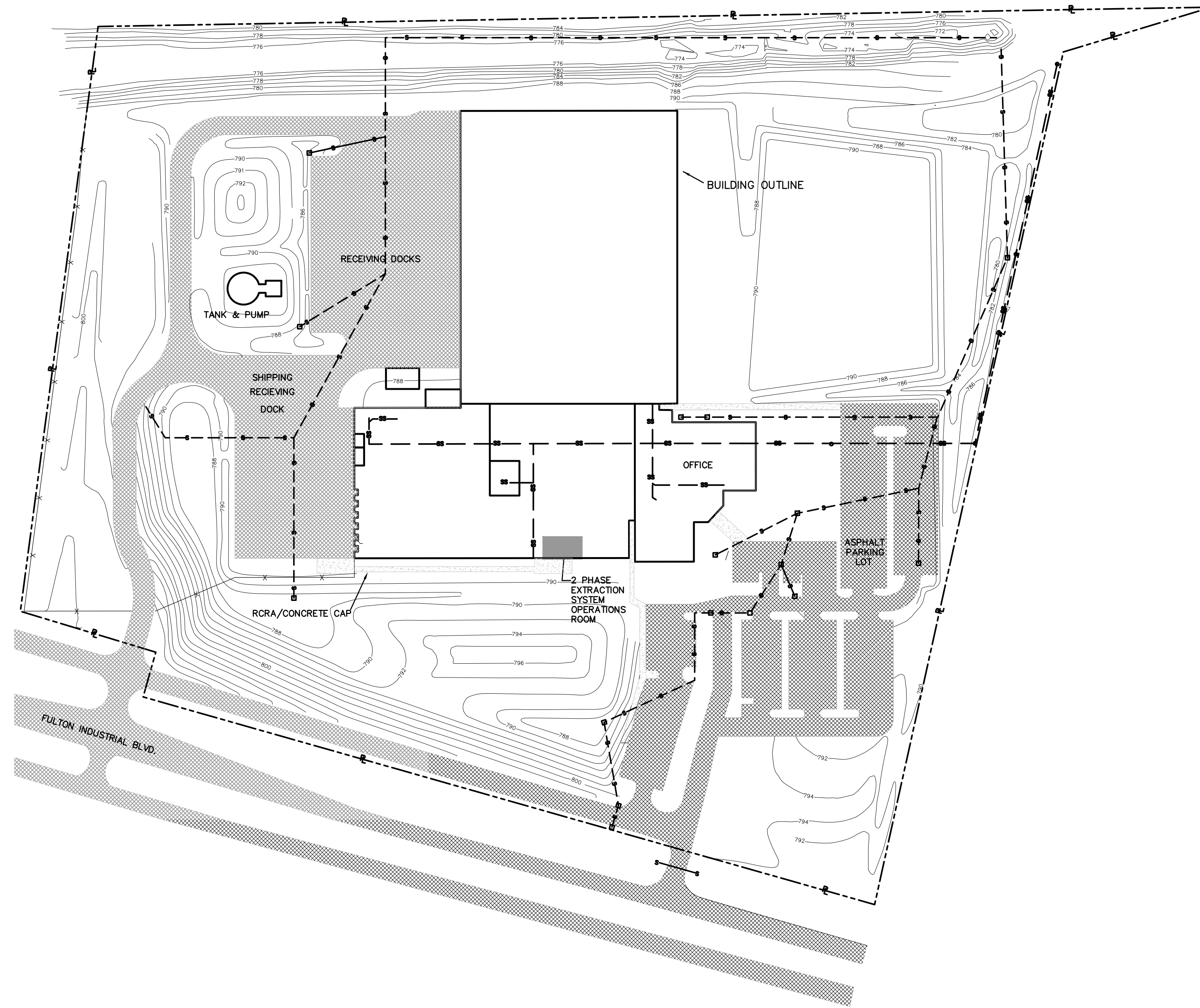
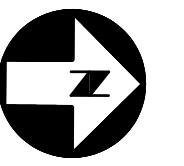


XEROX CORPORATION
FULTON INDUSTRIAL PARK
ATLANTA, GEORGIA

wood. Environment & Infrastructure
Solutions, Inc.
1075 BIG SHANTY ROAD, NW, SUITE 100
KENNESAW, GEORGIA 30144 (770) 421-3400

FACILITY FIRE PROTECTION MAP
JOB NO. 12000-8-0019
FIGURE B-4

PREPARED BY/DATE JQ 4/29/2020
CHECKED BY/DATE DA 4/29/2020



LEGEND

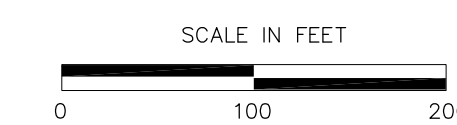
- SANITARY SEWER, MANHOLE
- STORM SEWER, DRAIN
- PROPERTY LINE
- TOPOGRAPHIC CONTOUR
- CONCRETE
- ASPHALT PAVED AREA

NOTES:

PARKING LOT AND DRIVE LAYOUT TAKEN FROM PLANS SUPPLIED BY XEROX CORPORATION MAGNETIC BEARING ALSO USED FROM XEROX PLANS

SURVEY OF PROPERTY FOR XEROX CORPORATION BY URBAN ENGINEERS, INC. AUGUST 27, 1973

TOPOGRAPHIC MAP FOR XEROX CORPORATION BY URBAN ENGINEERS, INC. SEPTEMBER 4, 1973 AND BY W.L. JORDAN, INC.



XEROX CORPORATION
FULTON INDUSTRIAL PARK
ATLANTA, GEORGIA

wood. Environment & Infrastructure
Solutions, Inc.

1075 BIG SHANTY ROAD, NW, SUITE 100
KENNESAW, GEORGIA 30144 (770) 421-3400

FACILITY SEWER LOCATIONS

JOB NO. 12000-8-0019

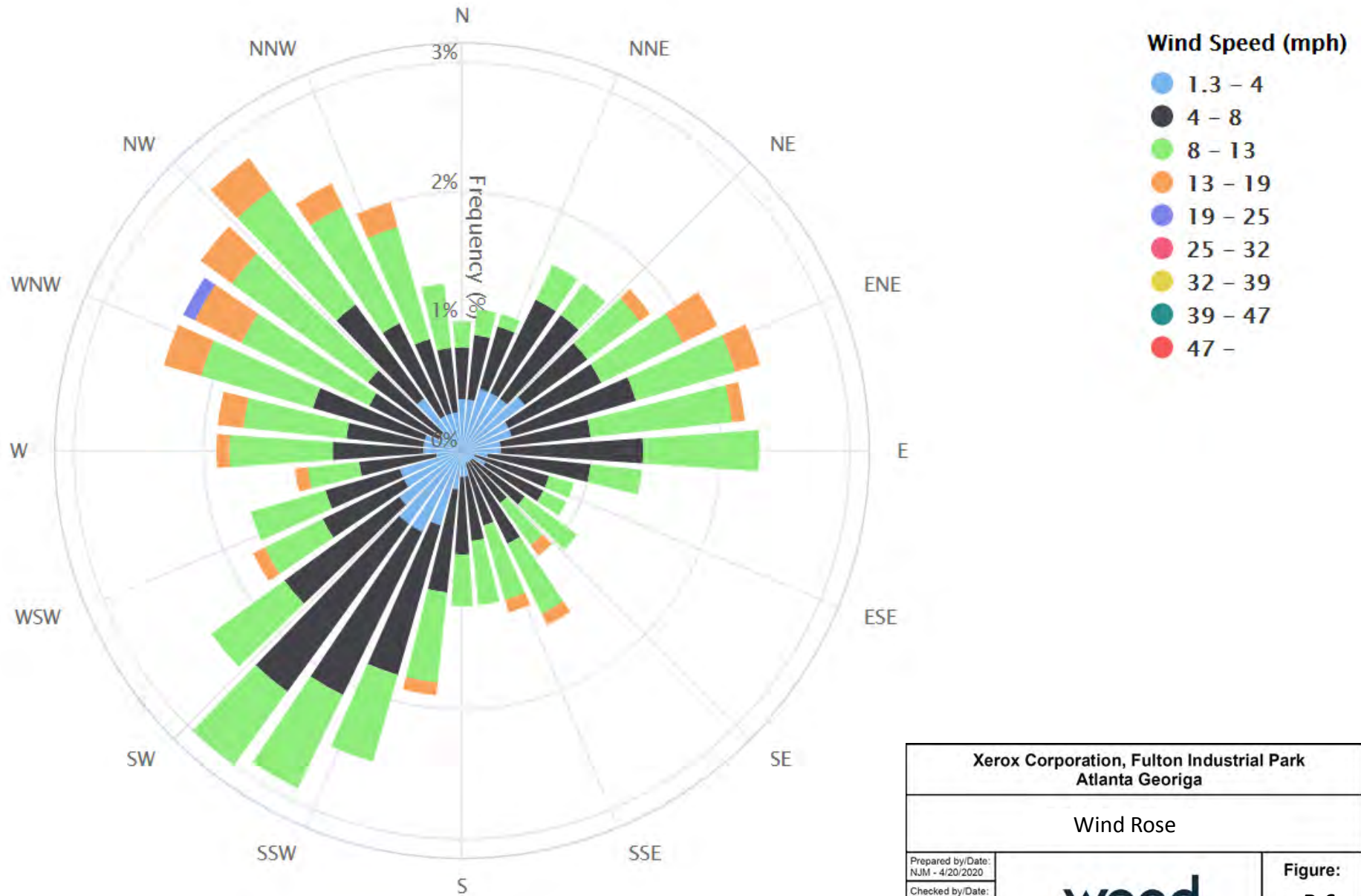
FIGURE B-5

LAYER/LEVEL
STORMSEW
SANITSEW

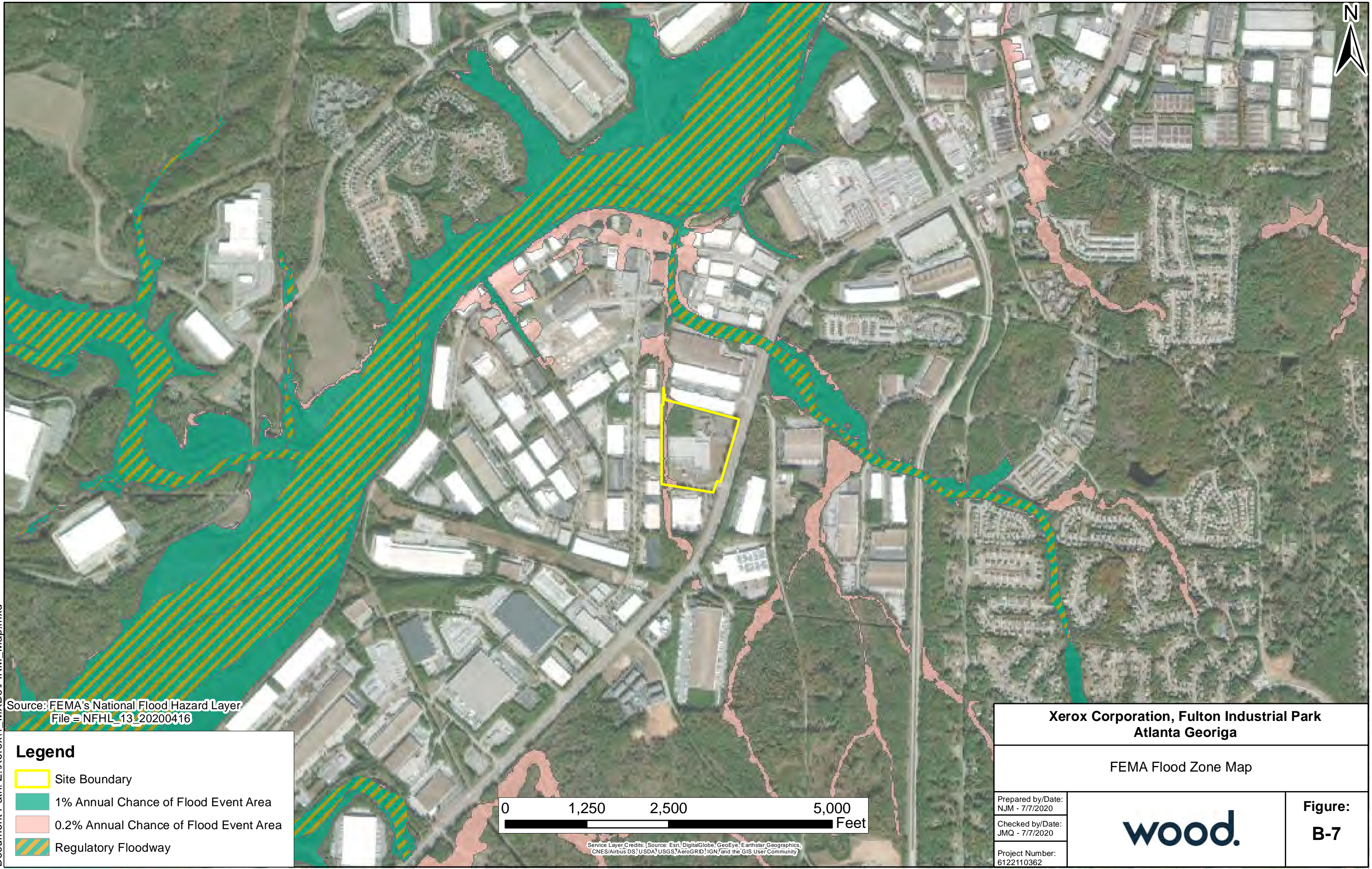
PREPARED BY/DATE JG 4/29/2020
CHECKED BY/DATE DA 4/29/2020

ATLANTA FULTON CO AP (GA) Wind Rose

Apr. 1, 2019 - Apr. 1, 2020
 Sub-Interval: Jan. 1 - Dec. 31, 0 - 23







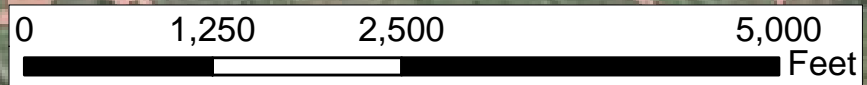
Xerox Corporation, Fulton Industrial Park Atlanta Georgia		
Wind Rose		
Prepared by/Date: NJM - 4/20/2020	wood.	Figure: B-6
Checked by/Date: JMQ - 4/20/2020		
Project Number: 6122110362		



Source: FEMA's National Flood Hazard Layer
File = NFHL_13_20200416

Legend

-  Site Boundary
-  1% Annual Chance of Flood Event Area
-  0.2% Annual Chance of Flood Event Area
-  Regulatory Floodway



Service Layer Credits: [Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community]

**Xerox Corporation, Fulton Industrial Park
Atlanta Georgia**

FEMA Flood Zone Map

Prepared by/Date:
NJM - 7/7/2020

Checked by/Date:
JMQ - 7/7/2020

Project Number:
6122110362



**Figure:
B-7**

Document Path: Z:\Xerox\1_MXD\IFIRM_Map.mxd