

Continuing Action Monitoring and Maintenance Plan

Fire Station 19, 3275 North Berkeley Lake Road North, Duluth, Georgia

The Fire Station 19 property was previously listed on the Georgia Environmental Protection Division's (EPD's) Hazardous Site Inventory along with several adjoining properties because of trace arsenic that was discovered in soil at the property in 2013. Following the discovery, Gwinnett County completed environmental investigations of soil and groundwater and developed a Corrective Action Plan (CAP) that was approved by EPD on January 15, 2015. Under the approved CAP, testing was performed to determine the site-specific risks to human health that may result from the trace arsenic in soil. Based the results of the testing and the continued use of the property as a fire station, it was concluded that the property would be subject to activity and use limitations and these measures would mitigate risks posed by the arsenic in soil.

To ensure that the activity and use limitations are not violated, Gwinnett County was required to enter an Environmental Covenant with EPD that documents the activity and use limitations. A copy of the Environmental Covenant is on file with the property deed in Gwinnett County. Additional site information is available in the Compliance Status Report (CDM Smith, January 9, 2018) and the CAP (CDM Smith, October 2014). Copies of these documents are maintained at the EPD Response and Remediation Program, Fire Station 19, and at the Gwinnett County Department of Water Resources.

The Environmental Covenant requires monitoring in accordance with this Continuing Action Monitoring and Maintenance Plan. The monitoring actions are to be conducted by the Gwinnett County Department of Water Resources and are required by the Uniform Environmental Covenant executed by the Gwinnett County Board of Commissioners. The activity and use limitations and actions addressed by this Continuing Action Monitoring and Maintenance Plan are paraphrased below.

- 1) Maintain non-residential property use;
- 2) Prohibit groundwater use at the property;
- 3) Maintain a permanent marker to notify entrants of digging and excavation restrictions at the property; and
- 4) Provide annual verification and reporting.

The attached Continuing Action Monitoring and Maintenance Plan Annual Verification Form shall be used to satisfy the plan monitoring, maintenance, notification, and reporting requirements. Additional instructions are on page 3 of the form.

**Continuing Action Monitoring and Maintenance Plan
Annual Verification Form
Fire Station 19, 3275 North Berkeley Lake Road North, Duluth, Georgia**

Item	Activities/Limitations to be verified by onsite inspection and interview	Select One	
1	<p>Are the current property uses Non-Residential? (Use as a fire station is a Non-Residential Property use)</p> <p>Non-Residential Property does not include the following property uses:</p> <ul style="list-style-type: none"> ▪ water supply facilities; ▪ health care facilities (i.e., skilled nursing care, nursing, personal care, general medical hospitals, surgical hospitals, psychiatric hospitals, and specialty hospitals); ▪ schools (i.e., elementary, secondary, junior colleges, colleges, universities, technical institutes, and professional schools); ▪ child day care services; ▪ religious organizations; and ▪ correctional institutions. <p>If NO, record a description/explanation for Board of Commissioners notification.</p>	Yes	No
2	<p>Is groundwater beneath the Property being pumped or used for any purpose?</p> <p>If YES, record a description/explanation for Board of Commissioners notification.</p>	Yes	No
3	<p>Is the water supply for the Property obtained from the Public Water Supply?</p> <p>If NO, record a description/explanation for Board of Commissioners notification.</p>	Yes	No
4	<p>Is the “NO DIG” notification posted on the main entrance, unobstructed, in a state of good repair, and completely legible?</p> <p>If NO, record a description/explanation for Board of Commissioners notification.</p>	Yes	No
5	<p>Are the Property grounds subject to non-construction activities that are intrusive to the subsurface, such as gardening?</p> <p>If YES, record a description/explanation for Board of Commissioners notification.</p>	Yes	No
6	<p>Are the unpaved surfaces on the Property grounds in stable condition without erosion problems and not in need of repairs?</p> <p>If NO, record a description and explanation. Implement maintenance requirements.</p>	Yes	No
7	<p>Are the paved surfaces on the Property grounds in serviceable condition and not in need of repairs?</p> <p>If NO, record a description and explanation. Implement maintenance requirements.</p>	Yes	No
8	<p>Are construction activities that are intrusive to the subsurface underway that will exceed a construction period of one year?</p> <p>If YES, record a description/explanation for Board of Commissioners notification. Notify construction representative in responsible charge that work underway requires EPD approval to continue.</p>	Yes	No
9	<p>Are construction activities that are intrusive to the subsurface planned that will exceed a construction period of one year?</p> <p>If YES, record a description/explanation for Board of Commissioners notification. Notify construction representative in responsible charge that the planned work will require EPD approval.</p>	Yes	No

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Adherence with the Environmental Covenant Property Activity and Use Limitations is to be verified on an annual basis by the Gwinnett County Department of Water Resources. The verification will include an annual Property inspection, interview of the fire station occupant in responsible charge, and other investigation(s) necessary to verify adherence with the Property Activity and Use Limitations. This verification form shall be completed on an annual basis and filed with the Gwinnett County Fire Headquarters and submitted to the Gwinnett County Board of Commissioners and the Georgia Environmental Protection Division no later than 180 days after UEC filing and annually thereafter.

Submittal Address

Gwinnett County Board of Commissioners
Chairman
75 Langley Drive
Lawrenceville, Georgia 30046

Georgia Environmental Protection Division
Land Protection Branch, Branch Chief
2 Martin Luther King Jr. Drive SE
Suite 1054 East Tower
Atlanta, GA 30334

Notifications

Written notifications shall be sent to the Chairman of the Gwinnett County Board of Commissioners upon determining that any of the Property Activity and Use Limitations from Page 1 require notification. Findings on Page 1 that require grounds maintenance must be promptly addressed through the standard County protocols.

Certification

I certify that this report was prepared under my direction by Department of Water Resources personnel properly qualified to gather and evaluate the information submitted. Based on my inquiry of the participants, 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 to EPD, including the possibility of fine and imprisonment for knowing violations.

Name:	
Signature:	
Title:	
Date:	