

**TECHNICAL CERTIFICATION**

I certify that I am a qualified groundwater scientist who has received a baccalaureate or postgraduate degree in the natural sciences or engineering, and have sufficient training and experience in groundwater hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport. I further certify that this report was prepared by me or by a subordinate working under my direction.



John DiZinno, P.E.  
Senior Engineer

2/18/14

Date

## VIRUS FREE CERTIFICATE

This document provided to the EPD on two compact disks (CDs) is the February 2014 Semi-Annual Progress Report, which includes the following components: complete text, appendices, tables and figures. The contents of the CDs are in Portable Document Format (PDF) which are identical to the hard copy and are free of computer viruses; Symantec Anti virus was used to check and scan for any viruses.

I certify that the CDs are virus-free, and the documents are accurate and complete.



---

Kandice Ferris



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## FEBRUARY 2014 SEMI-ANNUAL PROGRESS REPORT

**NEWNAN LOFTS APARTMENT COMPLEX  
(FORMER BIBB MILL)  
NEWNAN, GEORGIA**

**Prepared For:**

**Newnan Lofts Limited Partnership**

**Prepared by:  
Conestoga-Rovers  
& Associates**

3075 Breckinridge Blvd.  
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Duluth, Georgia 30096

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**FEBRUARY 2014  
REF. NO. 051315 (10)**

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## **FEBRUARY 2014 SEMI-ANNUAL PROGRESS REPORT**

**NEWNAN LOFTS APARTMENT COMPLEX  
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## Section 1.0 Introduction

Newnan Lofts Limited Partnership (Newnan Lofts) received approval for its Voluntary Investigation and Remediation Plan (VIRP) application from the Georgia Environmental Protection Division (EPD) on August 19, 2011. This report is the fifth semi-annual progress report (SAPR) to be submitted to EPD. The first SAPR was submitted to EPD in February 2012.

The purpose of each SAPR is to describe actions taken since the last submittal. The last submittal to EPD was the August 2013 SAPR. EPD provided comments on the fourth SAPR dated August 2013 by letter dated January 31, 2014. This report identifies activities conducted since the August 2013 report and responds to specific comments from EPD.

### 1.1 Background

The Newnan Lofts Apartment Complex located at 110 Field Street in Newnan, Georgia (Site) is the location of the former Bibb Mill Company cotton mill. The Site operated as a cotton mill from the late 1800s through the 1960s; from the 1960s through 1995 the Site operated as a warehouse. The former mill was redeveloped into apartment lofts in 1999. A Site location map is provided as Figure 1. A Site plan is provided as Figure 2.

Residual shallow soil contamination associated with the historic mill operations was identified at the Site in late 2007 during a routine environmental assessment. The contamination, limited to trace concentrations of certain polynuclear aromatic hydrocarbons (PAHs) and metals (lead, arsenic and cadmium), is commonly associated with operations that utilized coal as a fuel source. These analytes are present in the coal itself and in the ash resulting from burning coal and are likely present in shallow soils due to the dispersion of coal dust or ash during the transfer and storage of these materials. There is no evidence that these materials were disposed on Site. Therefore, the presence of the coal related analytes is anticipated to be from incidental releases of coal dust or ash during historic on-Site operations. Coal dust and ash, where present, appear to be intermixed and bound up in the soil matrix.

Shallow soils with concentrations of residual PAHs or metals that exceeded the Type 2 Risk Reduction Standards (RRS) were excavated and removed from the Site in 2008. Excavation was performed on previously sampled soils. Following this removal action, it was not known whether other soils remaining on Site had concentrations of PAHs or metals in excess of the notification concentrations (NCs) or Type 1 RRS. Additional soil sampling was performed in November 2010 to determine whether additional exceedances remained in on-Site soils.

In February 2012, CRA further delineated the horizontal and vertical extent of metals and PAHs in on-Site soil. The February 2012 soil delineation sample locations and analytical laboratory report were provided to EPD in the August 2012 SAPR.

In November 2012, CRA further delineated the horizontal and vertical extent of metals and PAHs in on-Site soil and select metals in sediment from the on-Site stormwater retention pond in the northeast portion of the Site. Three (3) surface water samples were also collected from the pond and were analyzed for PAHs and metals. In December 2012, soils were characterized from an off-Site stockpile selected as the source of imported fill for Site restoration after excavation activities. These activities were presented in the February 2013 SAPR.

During the previous reporting period (February 2013 through July 2013) soils exceeding the Type 1 RRS, based on exposure area averaging, that were accessible to residents, were excavated and removed from the Site. Soil samples were collected from the imported fill placed in the area west of the building and east of the CSX railroad. On-Site surface water and sediments in the stormwater retention pond and sediments in the on-Site drainage path in the northern portion of the Site were sampled and analyzed. One sediment sample was also collected in the north-south drainage path along the northwestern edge of the Site, north of the pool area. A positive ventilation system was installed in the crawl space of the mill buildings for mitigation of potential vapor intrusion pathways. Fencing was installed on the west side of the Site to restrict access to portions of the leased CSX property. Phytoremediation was implemented using poplar trees to reduce concentrations of various metals and PAHs in soils within the secured fenced areas. Surface cover treatments were also installed over soils left in place within the drip line of larger trees to be protected. An Environmental Inspection and Maintenance Plan (EIMP) were developed to address the future operations and maintenance of Site features, including remedial systems. These activities are documented in the August 2013 SAPR.

## **Section 2.0 Work Performed this Period**

### **2.1 Correspondence with EPD**

EPD provided comments regarding the August 2013 SAPR in correspondence dated January 31, 2014; the correspondence is included in Appendix A.

### **2.2 Depth Measurements in On-Site Pond**

On October 21, 2013, CRA measured the sediment depths at 22 locations in the on-Site retention pond to evaluate potential remedial options for sediments in the pond. Newnan Lofts submitted a letter to the EPD with a memorandum attached regarding the remedial options for the pond on December 6, 2013. In EPD correspondence dated January 31, 2014, EPD concurred that corrective action was not warranted for the on-Site pond and would cause more harm than benefit to the natural habitat.

### **2.3 Remediation Activities**

Upon evaluation of the area averaging calculations and at the request of EPD, the top one foot of soil was removed from the BH-26 and HA-8 areas and disposed off Site. The areas were subsequently restored. The work was performed between October 1 and October 4, 2013. The locations of the excavation activities are presented on Figure 3.

### **2.4 Environmental Inspection and Maintenance Plan**

Georgia EPD provided comments on January 31, 2014 regarding the EIMP; provisions for the maintenance and operation of the Site will be provided in the EIMP to be presented under separate cover.

### **Section 3.0 Proposed Remediation Activities**

Permanent markers will be installed at the corners of the Type 5 RRS areas. Additional details on the installation and maintenance of these markers will be provided in the EIMP to be presented under separate cover.

An additional soil sample will be collected from the uncovered area within the fence line north of location BH-26.

The availability of drought tolerant mixed grasses suitable for use as “phytoscaping” vegetation will be further assessed. The results and future replacement of landscaping will be addressed in the EIMP.

A draft Environmental Covenant will be developed and submitted to EPD for review and comment.

A Compliance Status Report (CSR) will be prepared once all activities are complete at the Site and operations and maintenance (per the EIMP) will be the only required on-going activities at the Site.

### **Section 4.0 Commitment to Future Requirements**

CRA affirms its commitment to the following future requirements:

- Completion of remedial activities and submittal of the CSR as proposed herein.

## **Section 5.0 Project Schedule**

All Site remediation activities are substantially complete. The anticipated milestone schedule is as follows:

- Submittal of draft Environmental Covenant to EPD – March 15, 2014;
- Notification to adjacent property owners following EPD review and concurrence – April 15, 2014;
- Execute and File Environmental Covenant – May 1, 2014;
- Submit Final CSR and Final O&M Plan (EIMP) – June 1, 2014.
- Implementation of the O&M Plan (EIMP) – currently underway.

## **Section 6.0 Engineering Fees**

Appendix B includes the summary of engineering fees incurred by this project from August 1, 2013 through January 31, 2014.

## **Section 7.0 Cost Estimates**

Proposed remedial activities at the Site are substantially complete. Work remaining consists of Site inspection and maintenance in accordance with the EIMP. This plan is designed to be implemented by Site maintenance personnel who are on Site full time for maintenance of the buildings and grounds. The Site is an income producing property that will continue to require and fund the paid maintenance positions. Thus the cost of implementation of the plan is already covered in the normal operation of Newnan Lofts. Incremental costs associated with plan implementation will therefore be less than \$500 per year.



# FIGURES

## FEBRUARY 2014 SEMI-ANNUAL PROGRESS REPORT

**NEWNAN LOFTS APARTMENT COMPLEX  
(FORMER BIBB MILL)  
NEWNAN, GEORGIA**

**Prepared For:**

**Newnan Lofts Limited Partnership**

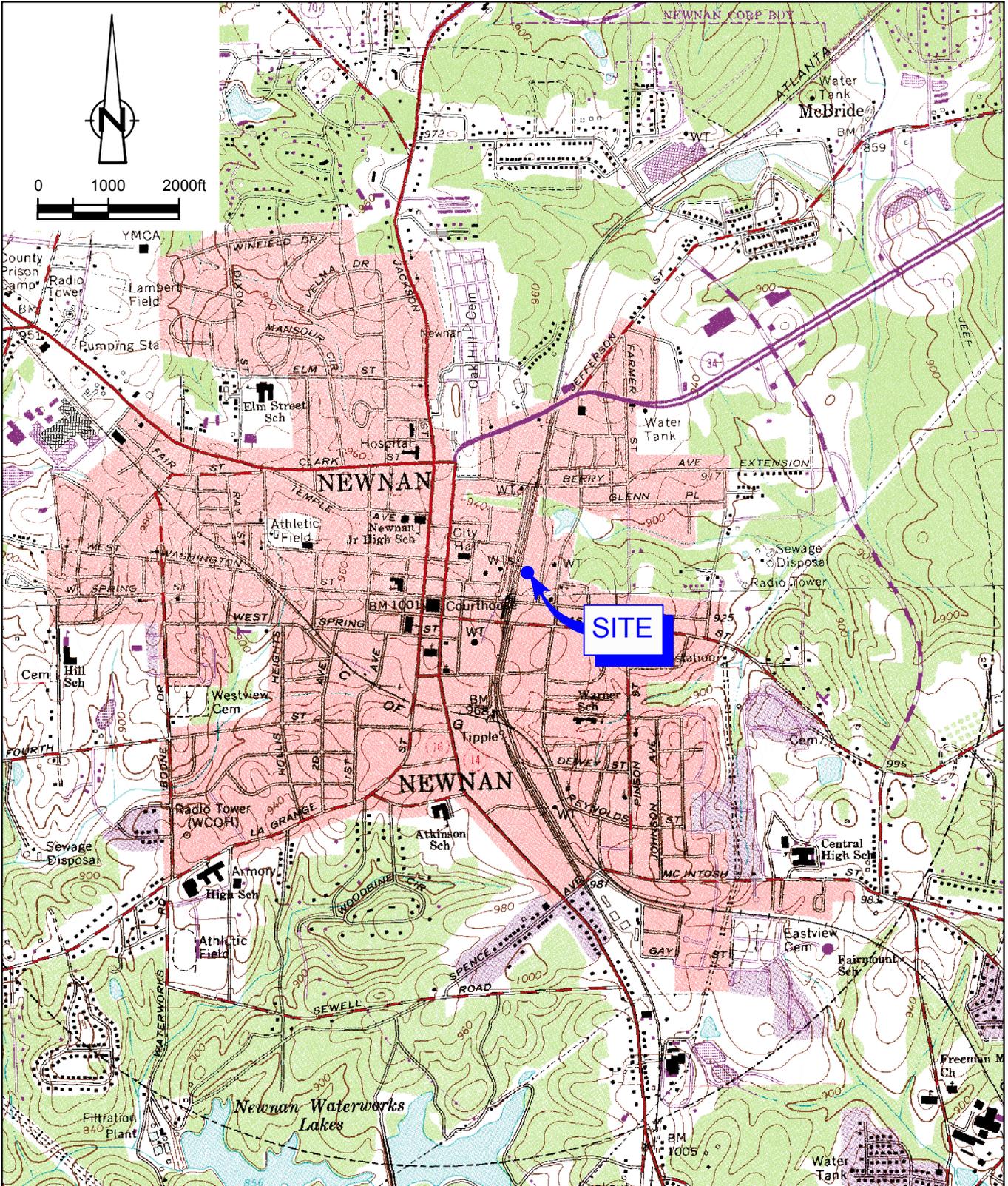
**Prepared by:  
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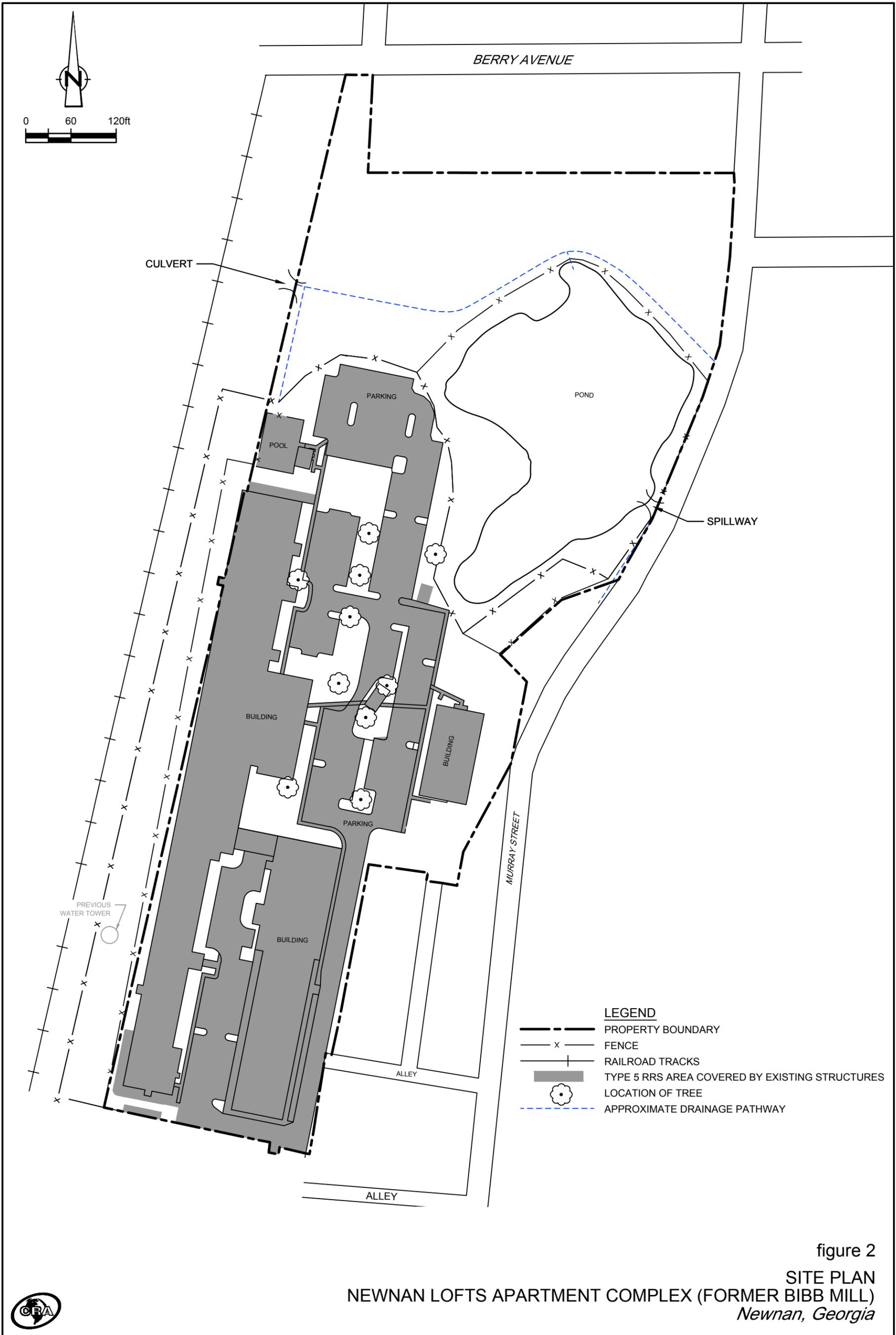


SOURCE: USGS QUADRANGLE MAPS:  
 NEWNAN NORTH, GA.  
 NEWNAN SOUTH, GA.

figure 1

**SITE LOCATION MAP**  
**NEWNAN LOFTS APARTMENT COMPLEX (FORMER BIBB MILL)**  
*Newnan, Georgia*





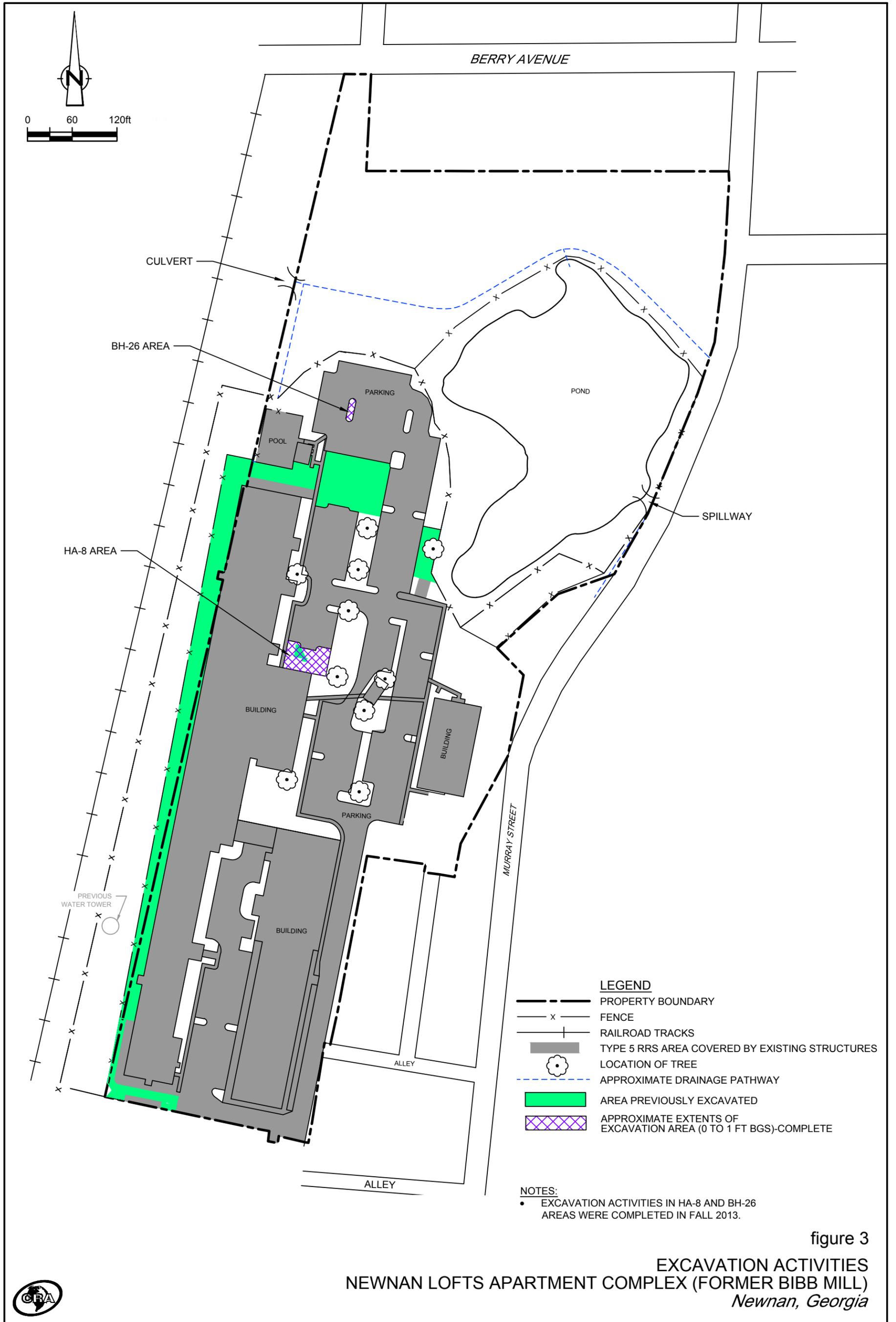


figure 3

EXCAVATION ACTIVITIES  
 NEWNAN LOFTS APARTMENT COMPLEX (FORMER BIBB MILL)  
 Newnan, Georgia





# APPENDICES

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**FEBRUARY 2014  
REF. NO. 051315 (10)**

# Appendix A

## EPD Correspondence

# Georgia Department of Natural Resources

## Environmental Protection Division

### Reply To:

Response and Remediation Program  
2 Martin Luther King, Jr. Drive, S.E.  
Suite 1054, East Tower  
Atlanta, Georgia 30334-9000  
Office 404/657-8600 Fax 404-657-0807

2 Martin Luther King, Jr. Dr., S.E., Suite 1456 East, Atlanta, Georgia 30334

Judson H. Turner, Director

Phone: (404) 656-4713 FAX: (404) 651-9425

January 31, 2014

### VIA EMAIL & REGULAR MAIL

Newnan Lofts Limited Partnership  
c/o Mr. James R. Borders  
817 West Peachtree Street NW, Suite 400  
Atlanta, Georgia 30308

Re: August 2013 Semi-Annual Progress Report  
Newnan Lofts Apartment Complex  
110 Field Street, Newnan, Coweta County, Georgia

Dear Mr. Borders:

The Georgia Environmental Protection Division (EPD) has received the August 2013, 4<sup>th</sup> Semi-Annual Progress Report (August 2013 Report) and correspondence dated December 6, 2013, which has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. After completing a review of the referenced document, EPD has prepared the following comments:

#### Ecological and Surface Water Pathway

- 1) Absent any conclusive negative impacts to ecological receptors or surface water impacts above background levels, it is EPD's professional judgment that any corrective action for the pond would do more harm than good at the present. However, EPD maintains that the associated environmental covenant for the property should include provisions for future maintenance and operation of the pond including the disposal of sediment contamination if future dredging is required and minimization of excessive discharge of silt from pond to the downgradient stream. Please provide a stormwater management plan for the property that addresses the pond issues above that can be incorporated into the planned maintenance and monitoring plan.

#### Other Comments

- 2) EPD concurs with the proposal for the excavation and offsite disposal of the upper one foot of soils in the HA-8 and BH-26 areas exceeding the Type 1 RRS. Please ensure that the VRP CSR includes the necessary data to certify horizontal and vertical delineation of the contaminants of concern in soil, including the confirmation sampling data from the excavated areas.
- 3) EPD continues to request additional characterization of the soil impacts north of BH-26. At a minimum, at least one sample should be collected from the uncovered area within the fence line north of BH-26, as there is no data confirming the extent of impacts between this BH-26 location and the excavation area around HA-9.

- 4) According to Section 2.3 of the August 2013 Report, poplar trees were being installed within the secured fenced areas for phytoremediation of various metals and PAHs in soils. EPD recommends the use of mixed grasses in place of or in combination with the poplar trees to address this component of the site remediation activities. Please ensure that the Environmental Inspection and Maintenance Plan (EIMP) includes verbiage that details the monitoring and maintenance of this “phytoscaping” vegetation in the applicable area(s) of the site along with a statement that the future replacement of this landscaping will include an equal or more beneficial technology that may be used to reduce or eliminate potential future exposure to impacted surface soils.
- 5) Please ensure that Figure 1 in Appendix D illustrates all designated Type 5 restricted access areas. This Figure should also be expanded to illustrate the entire extent of the property, including the northern fenced area and pond. In addition, please ensure that the EIMP includes the installation and maintenance of permanent markers for these designated “Type 5” areas.
- 6) Please ensure that the EIMP includes the monitoring and maintenance of the positive pressure ventilation system installed/attached to the crawl space of the main residential building.

A responses to EPD’s comments may be incorporated into the next semi-annual progress report due February 15, 2014. Should you have any question or concerns, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



Charles D. Williams  
Program Manager  
Response and Remediation Program

c: Bob Pyle, CRA  
Les Oakes, King & Spalding

File: VRP Application 1278434253 – Newnan Lofts Apartment Complex

S:\RDRIVE\KevinC\RRP Projects\VRP Applications\Newnan Lofts\Newnan Lofts-4th Progress Rpt Comments Revised.docx

# Appendix B

## Engineering Fees



Project History Report

Time: 13:34:45  
Date: 2/11/2014

From Period: 10/2013 Thru Period: 04/2014

Summary Selection: Project Code

Level: Project Resp Type: Co Code: Use Maps: N  
Map Code: Map Level: A/S Values: S

Multi Level Selection: None

Restrict By None Budget: Current Status: Active  
Ind: Min Value: Currency: Project Chargeable: Both Chargeable and Non Chargeable  
Max Value: Project w/o N Activity:

Project: 051315-Novare Group Holdings- Newnan Lofts

Phase \*\*\*\*-Novare Group Holdings- Newnan Lofts Task  
Co Org  
Rev Ttype

Account	EVC Code	EVC Name	Cls	Actv	L/E	R/O	B/N	Hours	Effort
5100001	403336	Leroy, Brian L.	310	****	L	R	B	9.50	1,254.49
5100001	400336	Pyle, Robert T.	310	****	L	R	B	46.00	7,210.65
5100001	400336	Pyle, Robert T.	330	****	L	R	B	3.00	407.55
5100001	411455	Ferris, Kandice	340	****	L	R	B	1.50	178.13
5100001	411455	Ferris, Kandice	350	****	L	R	B	119.50	12,714.80
5100001	411768	Yarbrough, Alexander	361	****	L	R	B	29.25	2,778.75
5100001	402308	Jones, Charles	500	****	L	R	B	2.00	328.70
5100001	410070	Jones, Steven	500	****	L	R	B	3.00	493.06
5100001	205100	Dyck, Wesley J.	520	****	L	R	B	4.00	528.21
5100001	411486	Laros, Christopher	550	****	L	R	B	1.00	90.25
5100001	400429	McMahon, Paul T.	620	CG02	L	R	B	7.50	990.39
5100001	400541	Finn, Sheri L.	631	CG02	L	R	B	0.50	58.43
5100001	410482	Grace, Steven	732	****	L	R	B	14.00	1,330.00
5100001	410482	Grace, Steven	732	F	L	R	B	31.00	2,945.00
5100001	405022	Brytowski, David J.	740	****	L	R	B	15.00	1,211.26
5100001	200745	Jerome, Melissa A.	805	****	L	R	B	5.00	475.00
5100001	210242	McLean, Peter A	815	****	L	R	B	3.00	222.30
5100001	200723	Tomlinson, Stephen P	821	****	L	R	B	0.50	37.05
5100001	411822	Majerowicz, Christin	879	DG01	L	R	B	4.50	453.15
5100001	411822	Majerowicz, Christin	879	DG08	L	R	B	1.50	151.05
5100001	408167	Ambrozich, Maria	906	****	L	R	B	0.75	41.33
5100001	410922	Belding, Melissa	906	****	L	R	B	1.50	82.65
5100001	411799	Hollister-Bay, Terri	906	****	L	R	B	9.50	523.45
5100001	410564	Jancetic, Lynn	906	****	L	R	B	0.50	27.55
5100001	412212	Tyran, Amanda	906	****	L	R	B	0.25	13.78
5100001	411450	Walker, Bonnie J.	906	****	L	R	B	3.00	165.30
5100001	412037	Wisniewski, Julie	906	CG13	L	R	B	2.00	110.20



## Project History Report

Time: 13:34:45  
Date: 2/11/2014

Account	EVC Code	EVC Name	Cls	Actv	L/E	R/O	B/N	Hours	Effort
5660010	40ANAENV	Analytical Environme		530	E		B	0.00	5,038.00
5670001	40AIRIN	Air Inc.		520	E		B	0.00	29.68
5670001	40FEXEDI	Federal Express ERS		510	E		B	0.00	10.31
5670001	40HOLPRO	Hole Products, LLC		520	E		B	0.00	111.30
5670001	40PINENV	Pine Environmental S		520	E		B	0.00	232.14
5670100	UCV	Company Vehicle Expe		320	E		B	0.00	129.06
5670100	UCV	Company Vehicle Expe		330	E		B	0.00	260.00
5675000	UIT	Information Technolo		401	E		B	0.00	1,275.88
5680100	405022	Brytowski, David J.		****	E		B	0.00	16.95
5680301	411455	Ferris, Kandice		****	E		B	0.00	8.44
5680301	410482	Grace, Steven		****	E		B	0.00	18.70
5680301	411768	Yarbrough, Alexander		****	E		B	0.00	10.00
5680321	411455	Ferris, Kandice		****	E		B	0.00	70.63
5680321	410482	Grace, Steven		****	E		B	0.00	29.95
5680321	400336	Pyle, Robert T.		****	E		B	0.00	166.68
5680520	405022	Brytowski, David J.		****	E		B	0.00	19.04
5680520	411455	Ferris, Kandice		****	E		B	0.00	14.43
5680520	410482	Grace, Steven		****	E		B	0.00	218.85
5680520	411768	Yarbrough, Alexander		****	E		B	0.00	21.18
5900001	CP	Photocopies		410	E		B	0.00	217.78
5900001	UT	Telephone		420	E		B	0.00	20.37
6290001	405022	Brytowski, David J.		****	E		B	0.00	0.00
6290001	411455	Ferris, Kandice		****	E		B	0.00	0.00
6290001	410482	Grace, Steven		****	E		B	0.00	0.00
6290001	400336	Pyle, Robert T.		****	E		B	0.00	0.00
<b>Totals</b>								<b>318.75</b>	<b>42,741.85</b>

END OF REPORT