

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
 Hazardous Sites Response Program
 Suite 1462, Floyd Tower East
 2 Martin Luther King Jr. Drive, SE
 Atlanta, Georgia 30334-9000

5598

RECEIVED
 Georgia EPD

JUL - 6 2011

1. The information provided in this form is for:

Initial Release Notification

Supplemental Notification

Response and Remediation Program

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

| | | | | | |
|----|-----------------------------------|-----------------------------------|---------|-----------------|-----------|
| 2 | EPA ID NUMBER (if applicable) | GAR000007484 | | | |
| 3 | Tax Map and Parcel ID Number: | Q 092-0017 | Acreage | 13.53 acres | |
| 4 | Site or Facility Name | Greenleaf Treatment Services, LLC | | | |
| 5 | Site Street Address | 100 Waste Research Drive | | | |
| 6 | Site City | Macon | County | Bibb | Zip 31206 |
| 7 | Property Owner | Greenleaf Treatment Services, LLC | | | |
| 8 | Property Owner Mailing Address | 4943 Austin Park Drive | | | |
| 9 | Property Owner City | Buford | State | GA | Zip 30518 |
| 10 | Property Owner Telephone No. | 678-714-8420 | | | |
| 11 | Site Contact Person | Mr. Jeff Sturgeon | Title | Member | |
| 12 | Site Contact Company Name | Greenleaf Treatment Services, LLC | | | |
| 13 | Site Contact Mailing Address | 4943 Austin Park Drive, Suite A | | | |
| 14 | Site Contact City | Buford | State | GA | Zip 30518 |
| 15 | Site Contact Telephone No. | 678-714-8420 | | | |
| 16 | Facility Operator Contact Person | Mr. Dan Nulf | Title | General Manager | |
| 17 | Facility Operator Company Name | Greenleaf Treatment Services, LLC | | | |
| 18 | Facility Operator Mailing Address | 100 Waste Research Drive | | | |
| 19 | Facility Operator City | Macon | State | GA | Zip 31206 |
| 20 | Facility Operator Telephone No. | 478-788-8899 | | | |

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and 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 the 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 fine and imprisonment for knowing violations.

 NAME (Please type or print) **Jeff Sturgeon** TITLE **Member**

 SIGNATURE *Jeff Sturgeon* DATE **July 1, 2011**

PART II -- RELEASE INFORMATION

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:

Unknown

2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):
Release dates - Unknown, Physical State of Material - Solid and Liquid

3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).
Groundwater and soil sampling and analyses performed. Temporary monitoring wells installed to determine direction of groundwater flow.

4. Access to the area affected by the release. Check the appropriate box:

- Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
- Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
- Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

A wire fence with a locking gate surrounds the office area, waste storage and treatment areas of the site. A surveillance system is located on the operating areas of the property.

5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.

- A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
- An engineered and maintained earthen material or compacted fill or a high density synthetic material
- Loose earthen fill or native soil
- No cover
- Other

Describe the type and thickness of the material covering the contaminated soil or wastes.
Crusher Run and gray-brown clay

PART II -- RELEASE INFORMATION

(Continued)

Page _____ of _____

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

Less than 300 feet 1001 to 3000 feet Greater than 1 mile
 301 to 1000 feet 3001 to 5280 feet

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: Residence

Address: Spikes Street, Macon, Georgia

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

Less than 0.5 miles 1 to 2 miles Greater than 3 miles
 0.5 to 1 mile 2 to 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: _____

Address: _____

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

Yes No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

PART IV -- GROUNDWATER RELEASE INFORMATION

Please provide the following information for EACH regulated substance released to the groundwater at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

| Regulated Substance | CAS Registry Number | Highest Detected Concentration (Specify Units) | Sample Depth Below Ground Surface (Feet) |
|------------------------------|---------------------|---|---|
| Acetone | 67641 | 37,000 ug/L | 20 ft. |
| 2-Butanone | 78933 | 1,200 ug/L | 20 ft. |
| Carbon disulfide | 75150 | 34 ug/L (J) | 20 ft. |
| 4-Methyl-2-pentanone | 108101 | 180 ug/L (J) | 20 ft. |
| 1,2-Diphenylhydrazine | 122667 | 73 ug/L | 20 ft. |
| bis (2-ethylhexyl) phthalate | 117817 | 31 ug/L (J) | 20 ft. |
| Naphthalene | 91203 | 36 ug/L (J) | 20 ft. |
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Site Summary
Greenleaf Treatment Services, Inc.
100 Waste Research Drive
Macon, Bibb County, Georgia

In June 2011, Environmental Technology Resources, Inc. (ETRI) was contracted by Greenleaf Environmental Group to complete a Phase II ESA of the property located at 100 Waste Research Drive in Macon, Bibb County, Georgia ("Site" or "subject property") (see Figure 1, Site Location Map). The purpose of this Phase II ESA was to confirm the findings from a previous Phase II ESA that was completed by Kleinfelder on behalf of A&D Holdings, Inc. in 2010.

SUMMARY OF PREVIOUS INVESTIGATIONS

In August 2010, Kleinfelder completed a Phase I and Phase II Environmental Site Assessment of the subject property. The Phase I and Phase II ESA was completed as part of a pre-acquisition due diligence. Five soil borings were installed by Kleinfelder and three soil samples and two groundwater samples were collected and analyzed for the presence of volatile organic compounds and semi-volatile organic compounds.

The soil borings were installed adjacent to a solidification pit, above ground storage tanks, down gradient of a hazardous waste storage area and two locations that were on the down gradient side of the property. The findings from their investigations detected the presence of various volatile and semi-volatile organic compounds in soils. The concentrations of volatile and semi-volatile organic compounds were below the Georgia EPD – Hazardous Site Response Program notification concentrations. The results of the soil sample analyses are summarized in Table 1.

A groundwater sample collected from boring B-1, located adjacent to a solidification pit was found to contain detectable concentrations of volatile and semi-volatile organic compounds. The results of the groundwater sample analyses are summarized in Table 2.

A copy of the Kleinfelder report is included as Attachment A. It should be noted that Kleinfelder incorrectly reported and interpreted the results of the soil sample analyses. The laboratory report from the Kleinfelder samples includes the correct results.

METHODS USED AND FINDINGS FROM ADDITIONAL INVESTIGATIONS

ETRI installed four soil borings on the Site (see Figure 2 for soil boring locations) on June 13, 2011. Soil boring B1 was located east and topographically down gradient of the waste solidification pit. Boring B2 was located east of the above ground storage tanks. Boring B3 was located down gradient of the hazardous waste storage area. Boring B4- was located on the east side of the property and down gradient of the operating facilities at Greenleaf Treatment Services.

ETRI retained the services of a geoprobe company (GeoLab Probing Services) to install the soil borings. The borings were installed using a direct push rig. Soil samples were collected using a dual tube system for sample collection. This allowed for discrete sample collection without cross contamination as the boring was advanced.

Soil samples were collected for analyses from the soils that had discoloration or exhibited elevated PID readings. Soil samples were collected from boring B1 at a depth of 5 to 10 feet, boring B2 at a depth of 10 to 15 feet, boring B3 at 0 to 2 feet and boring B4 at 2 to 5 feet. Soil samples for volatile organic compound analyses were collected using EPA Method 5035. All four soil samples were analyzed for the presence of volatile organic compounds and semi-volatile organic compounds using Methods SW 8260B and 8270D. The results of the analyses determined that no detectable concentrations of VOC's or semi-volatile organic compounds were present in B1-5-10 ft, B2-10-15 ft., and B3-0-2 ft. No VOC's were detected in sample B4-2-5 ft. Various semi-volatile organic compounds were detected in sample B4-2-5 ft. A summary of the soil sample results are included in Table 3.

After completing the soil sample collection, temporary groundwater monitoring wells were constructed to collect groundwater samples and develop potentiometric information.

The monitoring wells were constructed using one-inch diameter, Schedule 40, threaded PVC pipe and screened with ten (10) feet of one-inch diameter, Schedule 40, threaded 0.010 slot PVC pipe. A filter sock was initially placed over the screen interval prior to inserting the screen in the borehole. After installing the well screen and riser pipe, 20/30 sieve size silica sand was used to create a filter pack around the screen in the monitoring well. The sand extended to a height of two feet above the top of screen and was sealed from above with bentonite clay. The bentonite clay was brought to the ground surface to form an adequate seal. Water was added in order to hydrate the bentonite as it was placed in the annular space of the borehole. Well construction details are provided in Attachment C. The following table provides specific information regarding the construction of each monitoring well.

Summary of Well Construction Information
 100 Waste Research Drive, Macon, Georgia

| Monitoring Well Number | Date of Installation | Total Depth of Well (ft.) | Well Diameter | Screen Interval |
|------------------------|----------------------|---------------------------|---------------|-----------------|
| TMW-1 | June 14, 2011 | 30 feet | 1-inch | 20-30 feet |
| TMW-2 | June 14, 2011 | 20 feet | 1-inch | 20-30 feet |
| TMW-3 | June 14, 2011 | 30 feet | 1-inch | 20-30 feet |
| TMW-4 | June 14, 2011 | 30 feet | 1-inch | 20-30 feet |

Well development was conducted by purging each of the temporary wells with a peristaltic pump. Groundwater monitoring parameters including pH, specific conductivity and temperature were monitored during the well development. Well development continued until the field parameters stabilized.

It should be noted that TMW-1 and TMW-3 were initially installed at a depth of 20 feet. When it was determined that these wells were dry, the borings were advanced an addition ten feet to 30 feet and the temporary wells were constructed. TMW-2 was installed in a perched water bearing zone which did not exist in the three other locations.

On June 15, 2011, depth to groundwater measurements were made prior to purging the well for sampling. Prior to sampling groundwater, the well was purged using a peristaltic pump. pH, temperature, specific conductivity and turbidity were monitored during the purging process. Purging continued until pH, temperature and specific conductivity stabilized and the turbidity of the groundwater was less than 10 NTU.

Samples for VOC's were collected using the "Straw" method. After obtaining sufficient sample in the tubing, the sample was allowed to flow by gravity into clean 40 mL glass vials supplied by the laboratory. The vials contained hydrochloric acid as a preservative. Additional sample was collected for semi-volatile organic compound analyses. These samples were placed in one-liter amber containers supplied by the laboratory. The samples were maintained under proper chain-of-custody control from the time they were collected until they were relinquished to the laboratory. The groundwater samples were submitted to Analytical Environmental Services, Inc. of Atlanta, Georgia for analyses. The samples were analyzed for volatile organic compounds (VOCs) and semi-volatile organic compounds using EPA Methods 8260B and 8270C, respectively. The results of the groundwater sample analyses are summarized below.

Groundwater Sample Analyses
 100 Waste Research Drive, Macon, Georgia

| Parameter | TMW-1 | TMW-2 | TMW-3 | TMW-4 |
|------------|-------|-------|-------|-------|
| VOC's | BRL | BRL | BRL | BRL |
| Semi-VOC's | BRL | BRL | BRL | BRL |

Notes: BRL – Below Reporting Limit

Figure 3 is a monitoring well location map showing the locations of the monitoring wells and results from the groundwater sample analyses.

Relative top of casing elevations for each monitoring well were determined using a transit level. Using the top of casing elevations along with depth to water readings allowed the determination of the relative groundwater elevations in each monitoring well. The following table summarizes the top of casing elevations, depth to water readings and groundwater elevations for the four temporary monitoring wells.

Top of Casing, Depth to Water and Groundwater Elevations
100 Waste Research Drive, Macon, Georgia

| Monitoring Well Number | Date | Top of Casing Elevation (ft) | Depth to Water (ft) | Groundwater Elevation (ft) |
|------------------------|-----------|------------------------------|---------------------|----------------------------|
| TMW-1 | 6/15/2011 | 100 | 28.67 | 71.33 |
| TMW-2 | 6/15/2011 | 99.67 | 15.25 | 84.42 |
| TMW-3 | 6/15/2011 | 95.91 | 24.56 | 71.35 |
| TMW-4 | 6/15/2011 | 96.85 | 27.46 | 69.39 |

The direction of groundwater flow was determined to be to the southeast. A copy of the potentiometric map for the June 15, 2011 sampling event is included as Figure 4.

WATER RESOURCES SURVEY

ETRI completed a water resources survey to determine if any private or public drinking water wells were located within a one-mile radius of the subject property. The well survey included a review of U.S. Geologic Survey well inventory records, interviews and a visual inspection of properties located within a two-mile radius of the subject property. Based on the results of the water resources survey, no actively used drinking water wells or springs were identified within a two-mile radius. A copy of the water resources survey is included in Attachment C.

CONCLUSIONS

The findings from the Phase II ESA completed in June 2011 determined that soil in one boring was impacted with detectable concentrations of semi-volatile organic compounds including Benzo (a) anthracene, Benzo (a) pyrene, Benzo (b) fluoranthene, Benzo (k) fluoranthene and Chrysene above HSRA Notification concentrations. The subject property is enclosed with a fence and has a 24-hour surveillance system. Therefore, this site would be considered to be "Inaccessible".

The results of the groundwater sample analyses determined that no detectable concentrations of VOC's or semi-volatile organic compounds were present. These samples were collected from properly constructed, developed and purged temporary monitoring wells.

Previous testing completed in August 2011 by Kleinfelder detected the presence of VOC's and semi-volatile organic compounds in one groundwater sample. It should be noted that the Kleinfelder samples were collected from a geoprobe boring. In addition, their samples were collected from 20 feet borings. ETRI determined that a limited, perched water bearing zone exists at 20 feet. Groundwater in an upper water bearing zone is found at 24.56 to 28.67 feet below ground surface. The results of the groundwater sample analyses should not be considered to be an adequate representation of groundwater quality on this site.

Given that the site is considered as "Inaccessible" and no VOC or semi-volatile organic compounds were detected in groundwater, the Reportable Quantity Screening Method scores for the groundwater and on-site pathways should not exceed the threshold for a reportable quantity. Therefore, this site should not be listed on the Hazardous Site Inventory.

Greenleaf Treatment Services
 100 Waste Research Drive
 Macon, Bibb County, Georgia

TABLE 1: SUMMARY SOIL SAMPLE ANALYTICAL RESULTS - August 2010

| Parameter | Analytical Results | | | Georgia EPD Notification Concentration |
|--|--------------------|----------|----------|---|
| | Sample I.D. | B-1 | B-3 | |
| Depth | 0-2 feet | 0-4 feet | 0-4 feet | |
| <i>Volatile Organic Compounds</i> | | | | |
| Acetone | ND | 0.17 | 0.028 | 2.74 |
| Ethylbenzene | 10 | ND | ND | 20 |
| Isopropylbenzene | 0.050 J | ND | ND | 14 |
| Styrene | 0.13 J | ND | 0.001J | 14.4 |
| Xylenes | 0.35 | ND | ND | 20 |
| <i>Semi-Volatile Organic Compounds</i> | | | | |
| Acenaphthene | 0.049 J | 0.15 J | ND | 300 |
| Anthracene | 0.14 J | 0.12 J | ND | 500 |
| Benzo (a) anthracene | ND | 0.71 | ND | 5 |
| Benzo (a) pyrene | ND | 0.91 | ND | 1.64 |
| Benzo (b) fluoranthene | ND | 1.3 | ND | 5 |
| Benzo (g,h,i) perylene | ND | 0.88 | ND | 500 |
| Benzo (k) fluoranthene | ND | 0.55 | ND | 5 |
| Chrysene | ND | 0.95 | ND | 5 |
| Dibenz (a,h) anthracene | ND | 0.14 J | ND | 5 |
| bis (2-ethylhexyl) phthalate | 0.5 | ND | ND | 50 |
| Fluoranthene | 0.10 J | 2.4 | ND | 500 |
| Fluorene | 0.062 J | 0.099 J | ND | 360 |
| Indeno (1,2,3-cd) pyrene | ND | 0.71 | ND | 5 |
| Naphthalene | ND | 0.5 | 0.065 J | 100 |
| Phenanthrene | 0.23 | 1.7 | 0.05 J | 110 |
| Pyrene | 0.29 | 2 | ND | 500 |

Note: Results are mg/Kg, ppm
 Samples collected by Kleinfelder in August 2010

Greenleaf Treatment Services
 100 Waste Research Drive
 Macon, Bibb County, Georgia

TABLE 2: SUMMARY OF GROUNDWATER RESULTS - August 2010

| Parameter Sample I.D. | Analytical Results | | RQSM Toxicity Value |
|--|--------------------|-----|---------------------|
| | B-1 | B-2 | |
| <i>Volatile Organic Compounds</i> | | | |
| Acetone | 37,000 | ND | 2 |
| 2-Butanone | 1,200 | ND | 2 |
| Carbon Disulfide | 34 J | ND | 8 |
| 4-Methyl-2-Pentanone | 180 J | ND | - |
| <i>Semi-Volatile Organic Compounds</i> | | | |
| 1,2-Diphenylhydrazine | 73 | ND | 8 |
| bis (2-ethylhexyl) phthalate | 31 J | ND | 4 |
| Naphthalene | 36 J | ND | 4 |

Notes: Results in ug/L

Samples collected by Kleinfelder in August 2010

J - Estimated Value

ND - Not Detected

Greenleaf Treatment Services
 100 Waste Research Drive
 Macon, Bibb County, Georgia

TABLE 3: SUMMARY OF SOIL ANALYTICAL RESULTS

Volatile organic compounds

| Parameter | B1-5-10' | B2-10-15' | B3-0-2' | B4-2-5' | Notification Concentration (mg/Kg) |
|-----------|----------|-----------|---------|---------|------------------------------------|
| VOC's | BRL | BRL | BRL | BRL | NA |

Semivolatile Organic Compounds

| Parameter | B1-5-10' | B2-10-15' | B3-0-2' | B4-2-5' | Notification Concentration (mg/Kg) |
|------------------------|----------|-----------|---------|-------------------|------------------------------------|
| 1,1-Biphenyl | BRL | BRL | BRL | 1.9 mg/Kg | NA |
| 2-Methylnaphthalene | BRL | BRL | BRL | 5.3 mg/Kg | NA |
| Acenaphthene | BRL | BRL | BRL | 7.1 mg/Kg | 300 mg/Kg |
| Acenaphthylene | BRL | BRL | BRL | 6.7 mg/Kg | 130 mg/Kg |
| Anthracene | BRL | BRL | BRL | 15.0 mg/Kg | 500 mg/Kg |
| Benzo(a)anthracene | BRL | BRL | BRL | 28.0 mg/Kg | 5 mg/Kg |
| Benzo(a)pyrene | BRL | BRL | BRL | 15.0 mg/Kg | 1.64 mg/Kg |
| Benzo(b)fluoranthene | BRL | BRL | BRL | 28.0 mg/Kg | 5 mg/Kg |
| Benzo(g,h,i)perillene | BRL | BRL | BRL | 15.0 mg/Kg | 500 mg/Kg |
| Benzo(k)fluoranthene | BRL | BRL | BRL | 8.0 mg/Kg | 5 mg/Kg |
| Carbazole | BRL | BRL | BRL | 10.0 mg/Kg | NA |
| Chrysene | BRL | BRL | BRL | 26.0 mg/Kg | 5 mg/Kg |
| Dibenzofuran | BRL | BRL | BRL | 8.2 mg/Kg | NA |
| Fluoranthene | BRL | BRL | BRL | 86.0 mg/Kg | 500 mg/Kg |
| Fluorene | BRL | BRL | BRL | 12.0 mg/Kg | 360 mg/kg |
| Indeno(1,2,3-cd)pyrene | BRL | BRL | BRL | 16.0 mg/Kg | 5 mg/Kg |
| Naphthalene | BRL | BRL | BRL | 12.0 mg/Kg | 100 mg/Kg |
| Phenanthrene | BRL | BRL | BRL | 100.0 mg/Kg | 110 mg/Kg |
| Pyrene | BRL | BRL | BRL | 71 mg/Kg | 500 mg/Kg |

Notes: BRL - Below Reporting Limit
 Soil samples collected on June 14, 2011

PART II -- RELEASE INFORMATION

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:

The source of the release is attributed to former drycleaning activities that were performed in Suite B-101 by European Designer Cleaners, a former tenant. Suite B-101 is located near the northern end of the Grand Pavilion Shopping Center. Concentrations of PCE were observed in the soil and groundwater samples collected from borings located inside Suite B-101 installed adjacent to the former dry cleaning equipment.

2. Release dates(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):

The date of the release is unknown. According to a Phase I Environmental Site Assessment (ESA) performed by Epic Consulting Inc. (Epic) in May 2003, European Designer Cleaners began operating in 2000. According to the current property owner the suite has been vacant since 2008.

3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).

A Limited Phase II ESA was performed by Enercon Services, Inc. (ENERCON) in which soil and groundwater samples were collected on June 16 and 28, 2011 and analyzed for Volatile Organic Compounds (VOCs) by US EPA Method 8260B. No clean-up activities have been initiated at this time.

4. Access to the area affected by the release. Check the appropriate box:

- Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
 Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
 Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

The site is located in a shopping center that is accessible from Kimball Bridge Road and State Bridge Road. However, samples that were collected as part of the Limited Phase II ESA revealed elevated concentrations of regulated substances from Appendix I of the Georgia Rules of Hazardous Site Response to be located within Suite B-101 underneath a 3-inch concrete floor slab near the former dry cleaning equipment. None of the soil or groundwater samples collected from in front or behind Suite B-101 exhibited concentrations of VOCs above the laboratory reporting limits.

5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.

- A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
 An engineered and maintained earthen material or compacted fill or a high density synthetic material
 Loose earthen fill or native soil
 No cover
 Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

The material covering the soil in the area within Suite B-101 is concrete. The concrete is 3-4 inches thick.

PART II -- RELEASE INFORMATION

(Continued)

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6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

Less than 300 feet 1001 to 3000 feet Greater than 1 mile
 301 to 1000 feet 3001 to 5280 feet

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: John W. Greenert

Address: 225 Brookhollow CT., Alpharetta, GA 30022

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

Less than 0.5 miles 1 to 2 miles Greater than 3 miles
 0.5 to 1 mile 2 to 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: Everett Dodd well (current property owner: ANDA LLC). Well is currently unused.

Address: 3820 Old Milton Parkway, Alpharetta, Georgia 30005

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

Yes No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

Summary of Release Information
Grand Pavilion Shopping Center
11130 State Bridge Road
Alpharetta, Fulton County, Georgia 30022
ENERCON Project Number: PH_II010

ENERCON has been retained by Roberts Grand Pavilion, LLC to prepare and submit a Georgia Hazardous Site Response Program (GA HSRA) release notification for the above referenced property. The release notification is required based on the presence of Tetrachloroethene (PCE) within the soil and groundwater at a former dry cleaning facility located in Suite B-101, located on the subject property, above notification concentrations.

The subject property consists of one parcel described by the Fulton County Tax Assessor as 11-0360-0129-092-4 and consists of approximately 7.77 acres. The subject property was reportedly constructed in 1999 and consists of a 23-unit commercial/retail shopping center. The property can be accessed via an asphalt-paved drives off of Kimball Bridge Road and State Bridge Road on the north and west sides of the subject property. Based on the review of historical information for the subject property, the property was described as undeveloped land prior to the current site developed in 1999. The current owner of the subject property, Roberts Grand Pavilion, LLC acquired the property in 2005.

In June 2011, Property Solutions, Inc. performed a Phase I Environmental Site Assessment (ESA) for the above referenced property. The Phase I ESA revealed a former on-site dry cleaner (European Designer Cleaners) located in Suite B-101 on the northern end of the shopping center. The Phase I ESA recommended further investigation to determine if the former European Designer Cleaners had negatively impacted the soil and/or groundwater at the subject property.

In June 2011, ENERCON conducted a Limited Phase II ESA on the property. Six soil borings were installed on the subject property adjacent to Suite B-101 to a depth of 16 feet below ground surface (bgs) each. Two soil borings were completed in front of the former dry cleaner, two soil borings were completed inside the former dry cleaner in the area of the former dry cleaning equipment, and two soil borings were installed in back of the former dry cleaner to evaluate the potential for subsurface contamination from the former European Designer Cleaners. Soil and groundwater samples were collected from each boring. All of the soil and groundwater samples were laboratory analyzed for Volatile Organic Compounds (VOCs) by US EPA Method 8260B. VOC concentrations were observed within the two soil borings (designated SB-3 and SB-4) installed inside the former dry cleaner in the area of the former dry cleaning equipment. Concentrations of PCE at 0.20 milligrams per kilogram (mg/kg) were observed in soil boring SB-3 at a depth of 3 feet bgs. Additionally, a concentration of Trichloroethene (TCE) at 0.013 mg/kg was observed in soil boring SB-3 at a depth of 3 feet bgs. Please note that the concentration of TCE observed does not exceed the GAEPD HSRA notification. No other VOC constituents were detected in any of the soil samples collected from any of the other soil borings installed at the property above laboratory detection limits.

Groundwater was observed in the six borings at 9 to 10 feet bgs. Groundwater samples were collected from each boring and analyzed for VOCs by EPA Method 8260B. VOC concentrations were observed in the groundwater samples collected from the soil borings SB-3 and SB-4 installed inside the former dry cleaner near the former dry cleaning equipment. Soil borings SB-3 and SB-4 exhibited concentrations of PCE at 170 micrograms per liter (ug/L) and 260 ug/L, respectively. Groundwater was encountered within each of these borings at a depth of 9.5 feet bgs. No other VOC constituents were detected in any of the groundwater samples collected from any of the other soil borings installed at the site above laboratory detection limits.

Based on the information required to complete the Reportable Quantity Screening Method (RQSM), ENERCON performed a drinking water well/withdraw point survey for the subject property. The survey was performed utilizing the online United States Geologic Survey (USGS) National Water Information System located on the internet and an ENERCON internal USGS database. The nearest water well or withdraw point was determined to be a domestic well located 5,900 feet northwest of the subject site. The well was field verified to be located at a boarded up abandoned house located off Old Milton Parkway. There was no current resident at the property. An apparent well shed in a dilapidated condition was observed on the property. Currently, the area where the abandon house is located receives drinking water from a municipal water source.

The nearest residence, day care, and/or special needs facility in relation to the affected area at the subject property was determined to be a residence located approximately 420 feet east of the affected area. In summary, the soils affected by regulated substances are under the building floor slab that consists of 3-inches of concrete. The dry cleaners ceased operation and vacated the property in 2008, and therefore there is no active source.



RELEASE NOTIFICATION FORM

5600

HAZARDOUS SITES RESPONSE PROGRAM
GEORGIA ENVIRONMENTAL PROTECTION DIVISION
(Please type or print legibly)

RECEIVED
Georgia EPD

JUL 18 2011

Response and Remediation Program

1. The information provided in this form is for:

Initial Release Notification
 Supplemental Notification

PART I -- PROPERTY INFORMATION

| | | | | | | |
|----|-----------------------------------|------------------------------------|--------|---------|-----|-------|
| 2 | EPA ID NUMBER (if applicable) | | | | | |
| 3 | Tax Map and Parcel ID Number: | PIN: 7-0017-01-001 & 7-0017-01-002 | | | | |
| 4 | Site or Facility Name | BP EXPRESS, INC. | | | | |
| 5 | Site Street Address | 414 GRANGE ROAD | | | | |
| 6 | Site City | PORT WENTWORTH | County | CHATHAM | Zip | 31407 |
| 7 | Property Owner | BYRON RICHARD GODBEE | | | | |
| 8 | Property Owner Mailing Address | P.O. Box 2225 | | | | |
| 9 | Property Owner City | RINCON | State | GA | Zip | 31326 |
| 10 | Property Owner Telephone No. | 912-658-2268 | | | | |
| 11 | Site Contact Person | RICHARD GODBEE | Title | OWNER | | |
| 12 | Company Name | N/A | | | | |
| 13 | Site Contact Mailing Address | P.O. Box 2225 | | | | |
| 14 | Site Contact City | RINCON | State | GA | Zip | 31326 |
| 15 | Site Contact Telephone No. | 912-658-2268 | | | | |
| 16 | Facility Operator | SCOTT BATEY | Title | C.E.O. | | |
| 17 | Company Name | B.P. EXPRESS, INC. | | | | |
| 18 | Facility Operator Mailing Address | 516 RUSSELL ROAD | | | | |
| 19 | Facility Operator City | ROCKFORD | State | TN | Zip | 37853 |
| 20 | Facility Operator Telephone No. | 865-977-1243 | | | | |

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and 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 the 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 fine and imprisonment for knowing violations.

NAME (Please type or print)

SIGNATURE

B. RICHARD GODBEE

B. Richard Godbee

OWNER

TITLE

DATE

7-11-11

PART II -- RELEASE INFORMATION

Page ____ of ____

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:

DO NOT KNOW. WE HAD NO RELEASE ON PROPERTY, WE WERE NOT AWARE OF A SPILL UNTIL NOTIFIED BY LETTER FROM MS. CLEARY. (GA DNR).

2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):

DO NOT KNOW. ATTACHING INFO THAT WAS SENT TO US BY MS. CLEARY.

3. Describe those actions that have been taken to investigate, clean up or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).

DO NOT KNOW WHERE CORE SAMPLES WERE TAKEN ON PROPERTY, MR. PETER FLEURY WITH S&ME ENG. WAS TO SEND ME A COPY SHOWING WHERE SAMPLES WERE TAKEN. AS YET, HAVE NOT RECEIVED.

4. Access to the area affected by the release. Check the appropriate box:

- Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
 Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
 Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

CYCLONE FENCE WITH ELECTRONIC CONTROL AT FRONT GATE, OPEN DURING WORKING HOURS.

5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.

- A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
 An engineered and maintained earthen material or compacted fill or a high density synthetic material
 Loose earthen fill or native soil
 No cover
 Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

6" LIMESTONE AND OR CRUSH AND RUN ROCK AND DIRT, COMPACTED OVER YEARS OF TRUCK & TRAILER USE.

PART II -- RELEASE INFORMATION

(Continued)

Page ____ of ____

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

Less than 300 feet
 301 to 1000 feet

1001 to 3000 feet
 3001 to 5280 feet

Greater than 1 mile

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: _____

Address: MYRTLE ROAD

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

Less than 0.5 miles
 0.5 to 1 mile

1 to 2 miles
 2 to 3 miles

Greater than 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: DO NOT KNOW - ALL AREA IS ON

Address: CITY OF PORT WENTWORTH WATER SYSTEM.

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

Yes

No

If yes, provide details on the potentially affected humans or sensitive environments.

N/A

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. See instructions for information on how to obtain an original of the map on which your site is located.

PART IV -- GROUNDWATER RELEASE INFORMATION

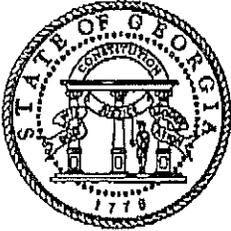
Page ____ of ____

Please provide the following information for EACH regulated substance released to the groundwater at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

| Regulated Substance | CAS Number | Highest Detected Concentration (Specify Units) | Sample Depth Below Ground Surface (Feet) |
|---|------------|---|---|
| DO NOT UNDERSTAND. AM ATTACHING CORE SAMPLING TESTS FROM SAME. | | | |
| | | | |
| THIS CONTAMINATION CAME FROM AN OFF-SITE FACILITY AND CAME TO US THROUGH A DITCH THAT RUNS THROUGH MY PROPERTY. THIS WAS DISCUSSED IN A PHONE CONVERSATION WITH MANAGER OF SIME, INC. | | | |
| | | | |
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| | | | |
| | | | |

5601

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
 Hazardous Sites Response Program
 Suite 1462, Floyd Tower East
 2 Martin Luther King Jr. Drive, SE
 Atlanta, Georgia 30334-9000

1. The information provided in this form is for:
 Initial Release Notification
 Supplemental Notification

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

| | | | | | |
|----|-----------------------------------|--|--------|-------------------------|-----------|
| 2 | EPA ID NUMBER (if applicable) | Unknown or Not Applicable | | | |
| 3 | Tax Map and Parcel ID Number: | 17-61-9-68-9 | Acres | 0.961 | |
| 4 | Site or Facility Name | Pharr Road Shopping Center | | | |
| 5 | Site Street Address | 308-16 Pharr Road, NE | | | |
| 6 | Site City | Atlanta | County | Fulton | Zip 30xxx |
| 7 | Property Owner | Walda S. Abner, et al (See Exhibit "A" hereto) | | | |
| 8 | Property Owner Mailing Address | c/o Bill McKenzie, Esq., Burr & Forman LLP, 171 17 th Street NW, Suite 1100 | | | |
| 9 | Property Owner City | Atlanta | State | GA | Zip 30363 |
| 10 | Property Owner Telephone No. | 404/686-4312 | | | |
| 11 | Site Contact Person | [same as 7,8,9 & 10 above] | Title | Attorney/Representative | |
| 12 | Site Contact Company Name | | | | |
| 13 | Site Contact Mailing Address | | | | |
| 14 | Site Contact City | | State | | Zip |
| 16 | Site Contact Telephone No. | | | | |
| 16 | Facility Operator Contact Person | Leandro Knowlton, Esq. | Title | Attorney | |
| 17 | Facility Operator Company Name | Miller & Martin PLLC (Attorneys for Pharr Road Realty, Inc. or its successor) | | | |
| 18 | Facility Operator Mailing Address | 1478 Peachtree Street, NE | | | |
| 19 | Facility Operator City | Atlanta | State | GA | Zip 30308 |
| 20 | Facility Operator Telephone No. | 404/962-0456 | | | |

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and 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 the 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 fine and imprisonment for knowing violations.

Revised May 2008

Bill McKenzie (Attorney, and Authorized Representatives for Property Owners)

NAME (Please type or print)

Bill McKenzie, Esq

Attorney/Representative

TITLE

July 21, 2011

SIGNATURE

Atty/Rep for Owners

DATE

PART II -- RELEASE INFORMATION

Page ____ of ____

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:

Based on 3rd party info, Carriage Cleaners at Pharr Road Shopping Center.

2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):

Release date(s) unknown. See Exhibit "B" Letter and attachments.

3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).

No specific actions thus far. See Exhibit "B" Letter attached.

4. Access to the area affected by the release. Check the appropriate box:

- Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
- Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
- Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

Site is ground leased to Pharr Road Realty, with additional Subleases. Site is subject to rights of such tenants. Property Owner's rights of access are restricted by said leases. Pharr Road Realty has indicated an intent to cooperate on this matter (see Exhibit "B" Letter), and thus, Property Owners presume access to the Site can be obtained.

5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.

- A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
- An engineered and maintained earthen material or compacted fill or a high density synthetic material
- Loose earthen fill or native soil
- No cover
- Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

Re: No. 5 above, the Site is subject to a "Ground Lease" dated November 14, 1966, with a lease term extending (as amended) through November 30, 2016 (50-year term) between Property Owner's predecessor-in-title (as "Lessor") and Pharr Road Realty ("Lessee"). At time of such Ground Lease, the Property was (on info and belief) unimproved. Lessee (Pharr Road Realty) constructed and is the operator of the shopping center improvements. Upon info and belief, the "material covering the contaminated soil or wastes" is asphalt, concrete or the floor of leased premises leased/subleased and operated by Carriage Cleaners at Pharr Road Shopping Center.

PART II -- RELEASE INFORMATION

(Continued)

Page _____ of _____

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

Less than 300 feet 1001 to 3000 feet Greater than 1 mile
 301 to 1000 feet 3001 to 5280 feet

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: Unknown at present.

Address: _____

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

Less than 0.5 miles 1 to 2 miles Greater than 3 miles
 0.5 to 1 mile 2 to 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: Unknown at present.

Address: _____

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

Yes No

If yes, provide details on the potentially affected humans or sensitive environments.

Unknown but see Exhibit "B" Letter and attachment.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
 Hazardous Sites Response Program
 Suite 1462, Floyd Tower East
 2 Martin Luther King Jr. Drive, SE
 Atlanta, Georgia 30334-9000

5602

RECEIVED
 Georgia EPD

JUL 26 2011

1. The information provided in this form is for:
 Initial Release Notification
 Supplemental Notification

PART I -- PROPERTY INFORMATION

Response and Remediation Program

(Please type or print legibly)

| | | | | | |
|----|-----------------------------------|------------------------------------|---------|---------|-----------|
| 2 | EPA ID NUMBER (if applicable) | NOT APPLICABLE | | | |
| 3 | Tax Map and Parcel ID Number: | 17-0149-0003-0243 | Acreage | 0.186 | |
| 4 | Site or Facility Name | CROWN CASTLE - #813192 XIV ATL 427 | | | |
| 5 | Site Street Address | 349 FOURTEENTH STREET | | | |
| 6 | Site City | ATLANTA | County | FULTON | Zip 30318 |
| 7 | Property Owner | KOOL KORNERNS, LLC | | | |
| 8 | Property Owner Mailing Address | 277 THE PRADO | | | |
| 9 | Property Owner City | ATLANTA | State | GEORGIA | Zip 30309 |
| 10 | Property Owner Telephone No. | 404-218-3897 | | | |
| 11 | Site Contact Person | MAC YOUNG | Title | PARTNER | |
| 12 | Site Contact Company Name | KOOL KORNERNS, LLC | | | |
| 13 | Site Contact Mailing Address | 277 THE PRADO | | | |
| 14 | Site Contact City | ATLANTA | State | GEORGIA | Zip 30309 |
| 15 | Site Contact Telephone No. | 404-218-3897 | | | |
| 16 | Facility Operator Contact Person | SEE # 11 | Title | | |
| 17 | Facility Operator Company Name | | | | |
| 18 | Facility Operator Mailing Address | | | | |
| 19 | Facility Operator City | | State | | Zip |
| 20 | Facility Operator Telephone No. | | | | |

21. **CERTIFICATION** --I certify under penalty of law that I am the owner of the real property described in this Release Notification and 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 the 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 fine and imprisonment for knowing violations.

MICHAEL E. GAMBLE
 NAME (Please type or print)

 SIGNATURE

KOOL KORNERNS, LLC - PARTNER
 TITLE
July 25, 2011
 DATE

PART II -- RELEASE INFORMATION

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:

The source of the release is suspected to be associated with historic cut and fill of the property.

2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):

The date(s) of release and quantity of material is not known. The physical state of the released materials, various Polyaromatic Hydrocarbons (PAHs), is suspected to be solid. Based on the lithology at the Property indicating fill material at depths ranging from 0 – 5 ft-bgs, the detected PAHs appear to occur at the cut/fill interface at the Property. The source of the PAHs is not known. The physical state of the detected Barium, Cadmium, Chromium and Lead concentrations in soil an/or groundwater are suspected to be indicative of naturally occurring background concentrations.

3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).

A Limited Phase II Site Assessment was performed based on the findings of a Phase I ESA previously conducted by MartinEnviro, dated June 1, 2011. MartinEnviro determined that the Site was located in a potential down gradient location relative to two (2) gas stations, one of which, a CITGO Gas Station, is located at 329 14th Street, approximately 140 feet east of Site and a second one located south of the Site. The CITGO Gas Station has a documented release to the groundwater. The field activities for the Limited Phase II ESA included the completion of one soil boring (B-1 northeast of the tower compound) and the collection of one (1) soil sample (GP-1@4') and one (1) groundwater sample (GP-1 GW) for laboratory analysis. Laboratory analytical parameters were chosen to determine the presence of contaminants typical of those associated with historical operations at the site. The laboratory analytical parameters included analysis for Volatile Organic Compounds (VOCs) by EPA Method 8260B, Semi-Volatile Organic Compounds (SVOCs) by EPA Method 8270C/8270PAHSIM, and the RCRA Metals Arsenic, Barium Cadmium, Chromium, Lead, Mercury, Selenium and Silver by EPA Method 6020/200.8 for soil and groundwater, respectively. Additionally, soil sample GP-1@4' was analyzed for Gasoline Range Organics (GRO) by EPA Method 8015.

4. Access to the area affected by the release. Check the appropriate box:

- Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
 Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
 Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

The Site is enclosed by a chain-link fence with privacy slats measuring approximately ten (10) feet in height. The gate entrance is secured with a keyed padlock.

5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.

- A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
 An engineered and maintained earthen material or compacted fill or a high density synthetic material
 Loose earthen fill or native soil
 No cover
 Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

Cultivated grass cover followed by tan, grey, brown, fine-to-medium, silt-sand to 5 feet. Residuum light tan, fine-to-medium micaceous silt from 5 to 16 feet.

PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

Less than 300 feet 1001 to 3000 feet Greater than 1 mile
 301 to 1000 feet 3001 to 5280 feet

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: ITELD SIMONE

Address: 1171 STATE STREET, NW, ATLANTA, GA 30318

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

Less than 0.5 miles 1 to 2 miles Greater than 3 miles
 0.5 to 1 mile 2 to 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: NO DRINKING WATER WELLS IDENTIFIED

Address: NOT APPLICABLE

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

Yes No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you **MUST** submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

PART III - SOIL RELEASE INFORMATION

Please provide the following information for EACH regulated substance released to the soil at the site and submit the laboratory analytical sheets for all samples analyzed from the site. Use additional sheets if necessary.

| REGULATED SUBSTANCE | CAS NUMBER | HIGHEST CONCENTRATION DETECTED BETWEEN 0 - 6 INCHES | HIGHEST CONCENTRATION DETECTED BETWEEN 6 - 24 INCHES | HIGHEST CONCENTRATION DETECTED GREATER THAN 24 INCHES |
|------------------------|------------|---|--|---|
| Barium | 7440393 | NOT DETECTED | NOT DETECTED | 61 mg/kg |
| Cadmium | 7440439 | NOT DETECTED | NOT DETECTED | 0.33 mg/kg |
| Chromium | 7738945 | NOT DETECTED | NOT DETECTED | 20 mg/kg |
| Lead | 7439921 | NOT DETECTED | NOT DETECTED | 10 mg/kg |
| Naphthalene | 91203 | NOT DETECTED | NOT DETECTED | 0.103 mg/kg |
| Acenaphthene | 83329 | NOT DETECTED | NOT DETECTED | 0.564 mg/kg |
| Fluorene | 86737 | NOT DETECTED | NOT DETECTED | 0.427 mg/kg |
| Phenanthrene | 85018 | NOT DETECTED | NOT DETECTED | 6.07 mg/kg |
| Anthracene | 120127 | NOT DETECTED | NOT DETECTED | 1.12 mg/kg |
| Fluoranthene | 206440 | NOT DETECTED | NOT DETECTED | 16.6 mg/kg |
| Pyrene | 129000 | NOT DETECTED | NOT DETECTED | 14.2 mg/kg |
| Benzo(a)anthracene | 56553 | NOT DETECTED | NOT DETECTED | 7.54 mg/kg |
| Chrysene | 218019 | NOT DETECTED | NOT DETECTED | 7.27 mg/kg |
| Benzo(b)Fluoranthene | 205992 | NOT DETECTED | NOT DETECTED | 8.64 mg/kg |
| Benzo(k)Fluoranthene | 207089 | NOT DETECTED | NOT DETECTED | 2.65 mg/kg |
| Benzo(a)pyrene | 50328 | NOT DETECTED | NOT DETECTED | 5.66 mg/kg |
| Dibenz(a,h)anthracene | 53703 | NOT DETECTED | NOT DETECTED | 1.42 mg/kg |
| Benzo(g,h,i)perylene | 191242 | NOT DETECTED | NOT DETECTED | 4.22 mg/kg |
| Indeno(1,2,3-cd)pyrene | 193395 | NOT DETECTED | NOT DETECTED | 5.35 mg/kg |

NOTES:

SITE SUMMARY

The property located at 349 14th Street in the City of Atlanta, Fulton County, Georgia (the "property") consists of a rectangularly shaped, single parcel of land measuring approximately 20 feet by 50 feet or 0.186 acres. A Property Location Map is included as **Figure 1**. The property is currently utilized as a telecommunications facility. The property is secured by a chain-link fence enclosure with privacy slats approximately ten (10) feet in height. A monopole tower, equipment storage shelter, and associated electrical equipment are located within the fenced enclosure. The ground surface at the property consists of a level gravel base.

The property is located within a developed area of Atlanta which includes both residential and commercial properties. Commercial business borders the property to the south, followed by 14th Street. A CITGO gas station is located to the southeast of the property. State Street borders the property to the west, followed by a strip mall. A residential area borders the property to the north. A residential area and associated parking lot borders the property to the east. Based on potentiometric data collected at the nearby CITGO gas station in January 2006 and March 2007, groundwater flow direction in the general area was shown to vary from west-northwest to southeast. A USGS Topographic Map is included as **Figure 2**.

In May 2011, Martin Environmental Solutions, Inc. (MartinEnviro) performed a Phase I Environmental Site Assessment (ESA) at the Property. The Phase I ESA revealed that the property was located down-gradient from two (2) gasoline stations (the aforementioned CITGO, located at 329 14th Street, and a former gasoline station, located at 348 14th Street. Based on potential environmental impacts associated with the gasoline stations, MartinEnviro conducted a Phase II ESA in June 2011. The investigation consisted of the collection of one (1) soil sample at 4 ft-bgs and a groundwater sample from a single soil boring, GP-1. MartinEnviro's soil boring location is illustrated on **Figure 3**. Soil sample GP-1 at 4 ft-bgs was analyzed for VOCs via EPA Method 8260B, SVOCs via EPA Method 8270C, RCRA Metals via EPA Method 6020, and TPH-GRO via EPA Method 8015. Based on the analytical results, the following constituents were detected in soil above their respective Notification Concentration (NC):

- SVOCs (highest concentration detected [mg/kg]) - Benzo(a)anthracene - 7.54 mg/kg, Benzo(a)pyrene - 5.66 mg/kg, Benzo(b)fluoranthene - 5.00 mg/kg, Chrysene - 7.27 mg/kg, Indeno(1,2,3-cd)pyrene - 5.36 mg/kg
- No VOCs were detected in soil above laboratory detection limits.
- No RCRA Metals were detected in soil above their respective NC.
- TPH-GRO was not detected in soil above laboratory detection limits.

According to MartinEnviro's well schematic for GP-1, groundwater was encountered at approximately 11 ft-bgs. One (1) groundwater sample was collected from GP-1 following conversion into a 1-inch temporary well and submitted for laboratory analysis of VOCs via EPA Method 8260B, SVOCs via EPA Method 8270PAH SIM, and RCRA metals via EPA method 200.8 (Total). Based on the analytical results, Anthracene (0.099 ug/L) was detected in groundwater above its NC of 0.050 ug/L (or the laboratory detection limit). No other constituents were detected in groundwater above their respective NC. Analytical data reports are included within MartinEnviro's June 2011 Phase II ESA which is provided as **Attachment A**.

OTHER INFORMATION

Other information obtained by Peachtree included a Potable Water Well Survey. The survey consisted of a USGS file review/well survey. According to USGS records two (2) water wells which are used for de-watering or irrigation purposes were reported to be located within an approximate radius greater than one-mile but less than three-miles from the Site. No drinking water wells were identified within three (3) miles of the Property. Refer to **Attachment B** for information regarding the well surveys.

5603

RELEASE NOTIFICATION/REPORTING FORM



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
 Hazardous Sites Response Program
 Suite 1462, Floyd Tower East
 2 Martin Luther King Jr. Drive, SE
 Atlanta, Georgia 30334-9000

RECEIVED
 Georgia EPD

JUL 26 2011

1. The information provided in this form is for:

- Initial Release Notification
 Supplemental Notification

Response and Remediation Program

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

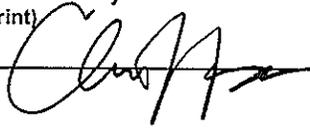
| | | | | | |
|----|-----------------------------------|---|---------|----------|-----------|
| 2 | EPA ID NUMBER (if applicable) | N/A | | | |
| 3 | Tax Map and Parcel ID Number: | 7-0018-03-009B | Acreage | 5.0 | |
| 4 | Site or Facility Name | LA Savannah-Crossgate, LLC, Property of | | | |
| 5 | Site Street Address | 416 Grange Road | | | |
| 6 | Site City | Savannah | County | Chatham | Zip 31407 |
| 7 | Property Owner | LA Savannah-Crossgate, LLC | | | |
| 8 | Property Owner Mailing Address | 1960 Satellite Boulevard | | | |
| 9 | Property Owner City | Duluth | State | GA | Zip 30097 |
| 10 | Property Owner Telephone No. | 770-995-3555 | | | |
| 11 | Site Contact Person | Gerald L. Pouncey, Jr. | Title | Attorney | |
| 12 | Site Contact Company Name | Morris, Manning & Martin, LLP | | | |
| 13 | Site Contact Mailing Address | 3343 Peachtree Road, N.E. | | | |
| 14 | Site Contact City | Atlanta | State | GA | Zip 30326 |
| 15 | Site Contact Telephone No. | 404-233-7000 | | | |
| 16 | Facility Operator Contact Person | N/A | Title | | |
| 17 | Facility Operator Company Name | | | | |
| 18 | Facility Operator Mailing Address | | | | |
| 19 | Facility Operator City | | State | | Zip |
| 20 | Facility Operator Telephone No. | | | | |

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and 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 the 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 fine and imprisonment for knowing violations.

Christopher J. Hayes
NAME (Please type or print)

Agent of LA Savannah-Crossgate, LLC
TITLE

SIGNATURE



DATE 7/26/2011

PART II -- RELEASE INFORMATION

Page 2 of 5

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:

Source of the release is unknown. The site is a former trucking facility from which four USTs were removed along with petroleum contamination by June 1995 and which has since received No Further Action status. Releases of non-petroleum-based contaminants may be attributable to off-site sources, including the Anthony Crane Rental site immediately to the west of the site, which has undergone cleanup activities.

2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):

The release date is unknown.

3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).

An investigation was performed in May 2010, which included three separate soil borings and groundwater samples. This investigation was performed by S&ME for the Georgia Department of Transportation without notice to or consent from the owner. The current owner only recently became aware of this investigation when the prior owner forwarded EPD's May 23, 2011 correspondence regarding potential release reporting requirements to the current owner.

4. Access to the area affected by the release. Check the appropriate box:

- Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
- Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
- Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.

- A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
- An engineered and maintained earthen material or compacted fill or a high density synthetic material
- Loose earthen fill or native soil
- No cover
- Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

The property includes a 4,000 square foot building which has an office area and shop for auto body repairs. The property is also mostly covered by a gravel parking court for truck and container parking and storage which also includes a automobile parking pad with 15 parking spaces for cars and two driveway aprons which consist of concrete.

PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

Less than 300 feet 1001 to 3000 feet Greater than 1 mile
 301 to 1000 feet 3001 to 5280 feet

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: Unknown residence

Address: 18 Horne Place, Port Wentworth, GA 31407

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

Less than 0.5 miles 1 to 2 miles Greater than 3 miles
 0.5 to 1 mile 2 to 3 miles

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: Port Wentworth GA1

Address: Latitude - 32 degrees, 9 minutes, 18 seconds North; Longitude - 81 degrees, 9 minutes, 50 seconds West

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

Yes No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

10. U.S.G.S. Topographic Map

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://ggsstore.dnr.state.ga.us>.

SITE SUMMARY

The subject property consists of five acres of land located at 416 Grange Road in Savannah, Chatham County. The property is vacant and currently has no ongoing operations. The property formerly was a trucking facility owned by Interstate National Lease, Inc. The property includes a 4,000 square foot building which has an office area and shop for auto body repairs. The property is also mostly covered by a gravel parking court for truck and container parking and storage which also includes a automobile parking pad with 15 parking spaces for cars and two driveway aprons which consist of concrete. The property is bordered by Grange Road to the south, undeveloped, wooded land to the north, and commercial trucking properties to its east and west boundaries.

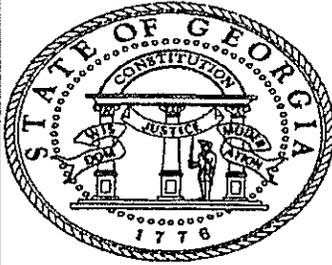
The property is currently the subject of the potential condemnation by the Georgia Department of Transportation's ("GDOT") for the Jimmy DeLoach Parkway Connector project ("the Project"), in which GDOT is proposing to install a 3.1 mile four-lane extension of Jimmy DeLoach Parkway from Bourne Avenue to the Port of Savannah's gate facilities. GDOT, through its environmental consultant S&ME, Inc., performed an environmental investigation of the property in May of 2010. This environmental investigation was performed without the knowledge or participation of the current owner. The current owner only recently became aware of this investigation when the prior owner forwarded EPD's May 23, 2011 correspondence regarding potential release reporting requirements to the current owner.

The May 2010 environmental investigation included three soil borings (INL-1, INL-2, and INL-3) from which soil and groundwater samples were collected and analyzed for VOCs using EPA Method 8260B and PAHs using EPA Method 8270D. 1,2-dichloroethane (ethylene dichloride or "EDC") was detected in the soil sample from INL-2 (0.034 mg/kg) in an amount above notification concentrations but at very low levels relative to notification requirements (0.02 mg/kg). Trichloroethylene ("TCE") was detected in the groundwater sample from INL-2 (0.487 mg/L). TCE was also detected in the groundwater sample from INL-1, but was below practical quantitation levels. Cis-1,2-dichloroethylene was detected in groundwater samples from INL-1 (0.018 mg/L) and INL-2 (0.205 mg/L). Additionally, the groundwater sample from INL-2 detected EDC (0.122 mg/L), as well as trans-1,2-dichloroethylene and 1,1-dichloroethylene, although both of these were in amounts below practical quantitation levels.

No contaminants were detected in soil boring INL-3. The May 2010 environmental investigation also detected regulated substances in groundwater and soil at the site attributable to petroleum-based fuels, which are not subject to notification under the Hazardous Sites Response Act. These detections are likely attributable to the four USTs which were removed from the property in 1995 and for which the property has received a No Further Action status.

Based upon a water well survey performed by Mactec, there are no drinking water wells within a one mile radius of the property. Also, the distance between the soil subject to notification and the nearest residence is approximately 1300 feet. Therefore, we respectfully submit that the property does not warrant listing on the Hazardous Site Inventory.

RELEASE NOTIFICATION/REPORTING FORM 5604



Mail to: GEORGIA ENVIRONMENTAL PROTECTION DIVISION
 Hazardous Sites Response Program
 Suite 1462, Floyd Tower East
 2 Martin Luther King Jr. Drive, SE
 Atlanta, Georgia 30334-9000

RECEIVED
 Georgia EPD

JUL 28 2011

| |
|--|
| 1. The information provided in this form is for: |
| <input checked="" type="checkbox"/> Initial Release Notification |
| <input type="checkbox"/> Supplemental Notification |

PART I -- PROPERTY INFORMATION Response and Remediation Programs

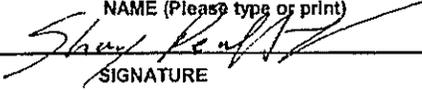
(Please type or print legibly)

| | | | | | |
|----|-----------------------------------|---|---------|------------------|-----------|
| 2 | EPA ID NUMBER (if applicable) | | | | |
| 3 | Tax Map and Parcel ID Number | 16056500050 | Acreage | 21.33 | |
| 4 | Site or Facility Name | Strip Retail Center located at 2800 Canton Road | | | |
| 5 | Site Street Address | 2800 Canton Road | | | |
| 6 | Site City | Marietta | County | Cobb | Zip 30066 |
| 7 | Property Owner | First Southern National Bank | | | |
| 8 | Property Owner Mailing Address | Property Owner Mailing Address is: 99 Lancaster Street, Stanford, KY 40484 *All mail should be sent to: First Southern Bank; c/o Paul Mashni, PEM Real Estate Group, 13834 N. Northsight Blvd, Suite 100, Scottsdale, AZ 85260 | | | |
| 9 | Property Owner City | Stanford | State | KY | Zip 40484 |
| 10 | Property Owner Telephone No. | 606 365 3555 | | | |
| 11 | Site Contact Person | Sharon Cauthen | Title | Property Manager | |
| 12 | Site Contact Company Name | PEM Real Estate Group | | | |
| 13 | Site Contact Mailing Address | 2800 Canton Road | | | |
| 14 | Site Contact City | Marietta | State | GA | Zip 30066 |
| 15 | Site Contact Telephone No. | 678.793.4941 | | | |
| 16 | Facility Operator Contact Person | Paul Mashni | Title | CEO | |
| 17 | Facility Operator Company Name | PEM Real Estate Group | | | |
| 18 | Facility Operator Mailing Address | 13834 N. Northsight Blvd, Suite 100, , AZ 85260 | | | |
| 19 | Facility Operator City | Scottsdale | State | AZ | Zip 85260 |
| 20 | Facility Operator Telephone No. | 480.422.6930 | | | |

21. **CERTIFICATION** -- I certify under penalty of law that I am the owner of the real property described in this Release Notification and 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 the 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 fine and imprisonment for knowing violations.

Shay Pendygraf

NAME (Please type or print)


SIGNATURE

Commercial Loan Officer

TITLE

7/27/11

DATE

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and 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 the 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 fine and imprisonment for knowing violations.

Shay Pandygraf
NAME (Please type or print)

Commercial Loan Officer
TITLE

SIGNATURE

DATE

PART II -- RELEASE INFORMATION

Page 1 of 9

Please provide the following information for EACH release at the site. If additional space is needed to answer any of the following questions, attach additional pages, as necessary.

1. Source of this release (i.e., drums, tanks, spills, wastepile etc.). Provide specific information on the suspected or known source of the release, including the source of this information:

A Phase I Environmental Site Assessment conducted by the prospective purchaser of the Site identified a former dry cleaner located on the Site and an off-site dry cleaner located directly adjacent to the site. A Limited Site Investigation found concentrations of PCE at 6 mg/l in the ground water, likely coming from the off-site source. No soil contamination was identified in the on-site soil with the exception of PCE at a concentration of 0.0059mg/kg, which is not required to be reported.

The presence of tetrachloroethene in groundwater at the site boundary near the off-site Polo Cleaners suggests that the compound may be migrating onto the site from this nearby facility.

2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):

We have no information or information as to the history of the release or the quantity of material released.

3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g., removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).

Please see attached Terracon Limited Site Investigation dated June 28, 2011. Terracon advanced four exterior soil borings (B-1 through B-4) (two adjacent to the on-site drycleaner and two adjacent to the off-site Polo

Cleaners) using a track-mounted Geoprobe drill rig. Five interior borings (B-5 through B-9) were also advanced at the site to evaluate subsurface conditions in the vicinity of the former on-site dry cleaning equipment. The four exterior soil borings (B-1 through B-4) were converted to temporary wells to facilitate the collection of groundwater samples.

Further site characterization of soil and groundwater will be conducted by the property owner, as detailed in the attached GaiaTech proposal dated July 25, 2011.

4. Access to the area affected by the release. Check the appropriate box:

- Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry.
 Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open.
Unlimited Access: No surveillance, and no barrier or fence.

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.

The site is a shopping center. The stores in the shopping center are locked when they are closed.

5. For soil releases, indicate the type of material covering this release, by checking the appropriate box below.

- A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or asphalt
 An engineered and maintained earthen material or compacted fill or a high density synthetic material
 Loose earthen fill or native soil
 No cover
 Other

Describe the type and thickness of the material covering the contaminated soil or wastes.

PART II -- RELEASE INFORMATION

(Continued)

Page 2 of 9

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest residence, playground, day care, school or nursing home.

- Less than 300 feet 1001 to 3000 feet Greater than 1 mile
 301 to 1000 feet 3001 to 5280 feet

Provide the name and address of the nearest residence, playground, day care, school or nursing home.

Name: Rated K for Kids Only - day care center

Address: Suite 400, Piedmont Village, 2800 Canton Road (on-site). Residences are also located 100 feet to the east of the Site.

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including wells located on the site).

- Less than 0.5 miles 1 to 2 miles Greater than 3 miles
 0.5 to 1 mile 2 to 3 miles

*Groundwater flow direction has not been determined.

Provide the name of the property owner and address of the location of the closest drinking water well.

Name: _____

Address: _____

8. Is there any evidence to suspect that a person or a sensitive environment has been exposed to this release?

- Yes No

If yes, provide details on the potentially affected humans or sensitive environments.

REQUIRED ATTACHMENTS

9. SITE SUMMARY

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached.

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map.

Both a summary and a site map are attached. A Phase I Environmental Site Assessment dated June 13, 2011 by Contour Environmental, LLC and a Limited Site Investigation dated June 28, 2011 by Terracon Consultants, Inc. is attached.

10. U.S.G.S. Topographic Map

Along with this form, you **MUST** submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. U.S.G.S. topographic maps are available for purchase on-line at <http://qgsstore.dnr.state.ga.us>.

9. Site Summary for 2800 Canton Road, Marietta, GA 30066

The Site consists of a shopping center located southeast of the intersection of Piedmont Road and Canton Road in Marietta. The Site is surrounded by mixed-use commercial and residential development. The shopping center was constructed in 1989 and consists of one story, slab on grade multi-retail buildings, with parking/drive areas and landscaped areas. Significantly, as explained further below, the Site is down gradient from another shopping center containing a dry cleaners, which appears to be the actual source of the release.

On June 13, 2011 a Phase I Environmental Site Assessment Report was prepared by Contour Environmental, LLC for Columbia Properties, the prospective purchaser of the property (attached). The Phase I Report identified two Recognized Environmental Conditions on the Site: a former dry cleaning facility previously located on the Site, called Fine Cleaners, and a dry cleaning facility observed on the directly adjacent property west of the Site, called Polo Cleaners, located at 2727 Canton Road. The Polo Cleaners facility is located topographically up gradient from the Site. Based on surficial topography, shallow groundwater from the Polo Cleaners site was inferred by Contour Environmental to flow in a northeasterly direction toward the Site. Contour recommended that soil and groundwater near both the on-site and off-site dry cleaners be sampled.

On June 28, 2011, Terracon Consultants, Inc. (Terracon) submitted a Limited Site Investigation Report to Columbia Properties for the Site. The scope of work included installing four soil probes, two adjacent to the former on-Site dry cleaner (B-3 and B-4), and two adjacent to Polo Cleaners (B-1 and B-2). These soil borings were converted to temporary monitoring wells and the groundwater was sampled. In addition, five interior borings (B-5 through B-9) were installed in the tenant space that was formerly occupied by the on-Site dry cleaner. Soil sample intervals of 0-1 feet and 4-5 feet below grade were sampled at each boring.

Since no volatile organic compounds (VOCs) readings were detected by field screening methods within the soil vapor of the exterior borings (B-1 through B-4), no soil samples were submitted for laboratory analyses. However, two soil samples were submitted from each of the interior soil borings (B-5 through B-9), with the exception of B-8 where only one sample was collected. No regulated substances were detected in soil above the applicable notification concentration. Tetrachloroethene (PCE) was only detected at one boring, B-5 at the zero to one foot interval at 0.0059 mg/kg. The deeper sample at this same location indicated less than detectable concentrations for all VOCs. All other samples were non-detect.

Groundwater samples were collected at borings B-1 through B-4. Only one sample, collected at B-1, detected any VOC. PCE was detected at 6 ug/l at temporary well B-1. Since the location of B-1 is approximately 200 feet from the off-site Polo Cleaners and groundwater appears to flow to the east from Polo Cleaners to the former on-Site dry cleaner, it is likely that the detected impacts originate from Polo Cleaners.

A potable water well and receptor survey was performed by Terracon in June 2011. The water well survey indicated an active drinking water well at 3029 Scott Road in Marietta, Georgia located approximately 0.61 miles northwest of the Site and a potential drinking water well at 3009 Scott Road approximately 0.59 miles northwest of the Site. However, based on Site

topography and nearby groundwater sinks e.g. streams and ponds, these wells are hydraulically upgradient of the Site. According to the Georgia ED Guidance Manual for the Reportable Quantities Screening Method, upgradient wells or springs should not be considered receptors. The nearest potential downgradient water wells were identified about 1.5 miles northeast of the Site across Noonday Creek.

PEM Real Estate Group, on behalf of the Site owner, has retained GaiaTech to conduct further Site characterization of the soil and groundwater conditions at the Site. Several permanent wells will be installed to confirm that groundwater at the Site flows to the northeast and also to determine the location of up-gradient versus downgradient drinking water wells. Further soil samples will be collected to confirm that no soil impacts are on the Site in excess of the notification concentraion. GaiaTech will submit all relevant findings to EPD.

A Topographic Vicinity Map and Boring Locations can be found in Appendix A of the June 28, 2011 Terracon Limited Site Investigation attached to this Release Notification.