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LIABILITY COMPANY



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Jimmy F. Kirkland  
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January 30, 2012

**RECEIVED**  
Georgia EPD

**VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED**

FEB - 2 2012

Mr. David Brownlee  
Acting Program Manager  
Response & Remediation Program  
Environmental Protection Division  
2 Martin Luther King, Jr. Drive, Suite 1462, Floyd Tower East  
Atlanta, Georgia 30334-9000

**Response and Remediation Program**

**Re: Initial Release Notification ("Notification") regarding Clairmonte F. David,  
468 Boulevard S.E., Atlanta, Fulton County, Georgia 30312 (the "Property")**

Dear Mr. Brownlee:

I am writing on behalf of our client, Branch Banking and Trust Company ("BB&T"), who is the secured creditor of Clairmonte F. David, the owner of the Property. As part of its pre-foreclosure due diligence, BB&T collected soil and groundwater data which require a release notification. The Property owner has filed Chapter 13 bankruptcy. The analytical results were provided to the counsel for the Property owner with a request to sign the EPD Release Notification/Reporting Form. The Property owner has been unwilling to sign the Release Notification/Reporting Form. In accordance with the loan documents, BB&T, as the secured creditor, is submitting an Initial Release Notification for the above-referenced Property.

If you have any questions regarding the content of the Notification, please contact me at 404-879-2460.

BB&T would like to foreclose on this Property and requests a prompt review.

Thank you for your assistance.

Sincerely,

Jimmy F. Kirkland

JFK/tta  
Enclosure

5931

# 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

FEB - 2 2012

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)     | N/A  |         |        |           |
| 3  | Tax Map and Parcel ID Number:     | Parcel ID No. 14-0021-0006-033-1<br>(See Attachment 9B1 for Tax Map) | Acreage | 0.436  |           |
| 4  | Site or Facility Name             | Clairmonte David Property  |         |        |           |
| 5  | Site Street Address               | 468 Boulevard SE   |         |        |           |
| 6  | Site City                         | Atlanta  | County  | Fulton | Zip 30312 |
| 7  | Property Owner                    | Dr. Clairmonte F David   |         |        |           |
| 8  | Property Owner Mailing Address    | 468 Boulevard SE   |         |        |           |
| 9  | Property Owner City               | Atlanta  | State   | GA     | Zip 30312 |
| 10 | Property Owner Telephone No.      |  |         |        |           |
| 11 | Site Contact Person               | N/A  | Title   |        |           |
| 12 | Site Contact Company Name         | For Environmental Questions See Cover Letter                         |         |        |           |
| 13 | Site Contact Mailing Address      |  |         |        |           |
| 14 | Site Contact City                 |  | State   |        | Zip       |
| 15 | Site Contact Telephone No.        |  |         |        |           |
| 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.

NAME (Please type or print)

TITLE

SIGNATURE

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 this release is 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.):**

The date, physical state, and quantity of the release are unknown.

**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).**

Soil and groundwater samples were collected from three (3) direct-push borings advanced at the site during a limited soil and groundwater investigation. Soil samples were screened with a PID, and PID readings in soil samples ranged between none detected to 2.7 parts per million (ppm). Groundwater samples were collected from two borings (B-1 and B-2) and analyzed for benzene, toluene, ethylbenzene and xylenes (BTEX) by EPA SW-846 Method 8260; and a groundwater sample was collected from a third boring (B-3) and analyzed for volatile organic compounds (VOCs) by EPA SW-846 Method 8260. Gasoline constituents, ethylbenzene, MTBE, and 4-Methyl-2-pentanone were detected in the groundwater sample collected from B-3. Additional details are discussed in **Attachment 9A** Site Summary.

**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.**

N/A

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

N/A

- 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.**

N/A

**PART II - - RELEASE INFORMATION**

(continued)

Page 3 of 6

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: Terene G Bennett

Address: 477 Boulevard SE, Atlanta, 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 .05 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: N/A

Address: N/A

A well survey is included in **Attachment 11**.

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. SEE ATTACHMENT 9A: Site Summary

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. SEE ATTACHMENT 9B: Figures 9B2 and 9B3

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

Along with this form, you **MUST** submit an original U.S.G.S. topographical map (1:24,000) 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. SEE ATTACHMENT 10: USGS Topographic Map (EPD's copy only).





**ATTACHMENT 9A: Site Summary**

The Property consists of a 0.436-acre tract of land and is developed with an approximate 3,050-square foot commercial building, currently operating as Animals Fur 1<sup>st</sup> Veterinary Clinic. The Property is referenced by the address of 468 Boulevard SE and is located on the eastern side of Boulevard SE in Atlanta, Fulton County, Georgia 30312. The Property is referenced as Parcel ID No. 14-0021-0006-033-1. A tax assessor's map of the Property (refer to **Attachment 9B1**) and a site and area layout (refer to **Attachment 9B2**) are included in **Attachment 9B**.

Based on information and belief, the Property appears to have been developed with residential structures and associated ancillary structures from at least 1911 to at least the mid-1980s. The existing structure was developed in 1989. On-site operations currently consist of daily patient care, and minor surgical procedures for primarily cats and dogs. No environmentally suspect tenants (i.e. dry cleaners, printers, etc.) are believed to have operated on-site, and no industrial or manufacturing operations have been performed on-site.

The Property is bound by Boulevard SE to the west. A multi-tenant shopping center, which contains a dry cleaning tenant (currently operating as a drop-off facility), is located west of the Property and Boulevard SE, and a fire station and residential structure are located to the northwest and southwest of the Property and Boulevard SE, respectively. Residential dwellings are located to the east of the Property. A commercial structure (dwelling conversion) and a BP Gasoline Station are located north of the Property. A frame shop is located to the south of the Property, with residences further south.

Due to an impending property transaction, on June 2, 2011, GLE Associates, Inc. (GLE) advanced three (3) direct push soil borings (B-1 through B-3) on the northern portion of the Property (refer to **Attachment 9B2** for boring locations) to determine if the Property had been impacted by off-site releases. Soil samples were collected from the borings, and screened with a photoionization detector (PID). PID readings in the soil samples screened ranged from none detected to 2.7 parts per million (ppm). The borings were converted into temporary monitoring wells, and following proper purge and development activities, groundwater samples were collected from each temporary monitoring well. Groundwater samples from two of the temporary monitoring wells (B-1 and B-2) were collected for laboratory analysis of benzene, toluene, ethylbenzene, and xylenes (BTEX) and groundwater collected from the third boring (B-3) was collected for laboratory analysis of volatile organic compounds (VOCs) in order to assess groundwater quality underlying portions of the Property.

No BTEX constituents were detected in groundwater samples B-1-GW and B-2-GW. Gasoline constituents ethylbenzene, methyl tert-butyl ether (MTBE) and 4-Methyl-2-pentanone were detected in groundwater sample B-3-GW at concentrations of 0.0054 milligrams per liter (mg/L), 0.450 mg/L and 0.017 mg/L, respectively. The ethylbenzene and 4-Methyl-2-pentanone concentrations are below their respective Maximum Contaminant Level (MCL) of 0.7 mg/L and 2 mg/L, respectively. Georgia EPD has no established MCL for MTBE at this time. The presence of gasoline constituents in groundwater at the Property, combined with the anticipated direction of the groundwater flow from portions of the nearby BP Gasoline Station to the southeast and southwest, towards the Property, and the previous impacts of BTEX and MTBE to the BP station and property to the south of the BP station, suggests that groundwater underlying the Property has been impacted by a petroleum release originating from the upgradient BP gasoline station, which is listed as a Leaking Underground Storage Tank (LUST) facility with Georgia EPD UST Management Program (EPD Facility ID No. 0601056). Groundwater results are indicated on **Attachment 9B3**.

A copy of the laboratory analytical data for the Property, boring logs, and boring location plan are appended in **Attachment 9B** for your review. No actions have been taken to remediate the Property. A well survey (**Appendix 11**) was performed to locate active drinking water wells within a 3-mile radius. No active drinking water wells or public water supplies at or within 3-miles of the Property were identified. Based on our information and belief, there are no groundwater users to be impacted. Therefore, based on the historic development of the Property, lack of exposure, location in an area of lower groundwater pollution susceptibility, and location of the nearest drinking water source, this Property should not be listed on the Hazardous Site Inventory (HSI).

**ATTACHMENT 9B:**

**9B1 – Fulton County Tax Assessors Tax Map**

**9B2 – Boring Location Map**

**9B3 - Groundwater Analysis Map**

**Boring Logs and**

**Laboratory Analytical Data**

5932

# RELEASE NOTIFICATION/REPORTING FORM

HAZARDOUS SITES RESPONSE PROGRAM  
GEORGIA ENVIRONMENTAL PROTECTION DIVISION

RECEIVED  
Georgia EPD

FEB - 9 2012

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:     | Parcel ID No. 085 5805 001<br>(See Attachment 9B1 for Tax Map) | Acreage | 30             |           |  |
| 4  | Site or Facility Name             | Eckerd Distribution Center                                     |         |                |           |  |
| 5  | Site Street Address               | 36 Herring Road  |         |                |           |  |
| 6  | Site City                         | Newnan   | County  | Coweta         | Zip 30265 |  |
| 7  | Property Owner                    | Eckerd Corporation c/o Rite Aid                                |         |                |           |  |
| 8  | Property Owner Mailing Address    | P.O. Box 3165  |         |                |           |  |
| 9  | Property Owner City               | Harrisburg   | State   | PA             | Zip 17105 |  |
| 10 | Property Owner Telephone No.      |  |         |                |           |  |
| 11 | Site Contact Person               | Joseph J. Notarianni   | Title   | Vice President |           |  |
| 12 | Company Name                      | P.O. Box 3165  |         |                |           |  |
| 13 | Site Contact Mailing Address      |  |         |                |           |  |
| 14 | Site Contact City                 | Harrisburg   | State   | PA             | Zip 17105 |  |
| 15 | Site Contact Telephone No.        | 717-730-7724   |         |                |           |  |
| 16 | Facility Operator                 | NA   | Title   |                |           |  |
| 17 | Company Name                      | NA   |         |                |           |  |
| 18 | Facility Operator Mailing Address | NA   |         |                |           |  |
| 19 | Facility Operator City            | NA   | State   |                | Zip       |  |
| 20 | Facility Operator Telephone No.   | NA   |         |                |           |  |

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.

Eckerd Corporation  
By: Joseph J. Notarianni, Vice President  
NAME/TITLE

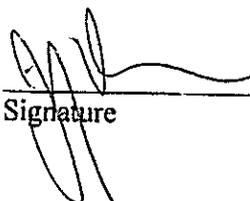
By:   
SIGNATURE

2/7/11  
DATE

\* The soil and groundwater investigation that has triggered this release reporting was performed by GLE consultants during environmental due diligence activities on behalf of a prospective purchaser of the property. Accordingly, the investigation was not performed under my direction or supervision, but to the best of my knowledge and belief, the results of the investigation are true, accurate and complete.

Eckerd Corporation

By: Joseph J. Notarianni, Vice President



Signature

2-7-11

Date

## PART II - - RELEASE INFORMATION

Page 2 of 7

*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 this release is 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.):

The date, physical state, and quantity of the release are unknown.

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).

In connection with due diligence activities on behalf of a prospective purchaser of the property, soil and groundwater samples were collected from six (6) direct-push borings and one (1) hand auger boring advanced at the site during a limited investigation performed at the site. Four (4) soil samples were collected from the direct push borings and one (1) background soil sample was collected using a hand auger. Two (2) groundwater samples were collected from two (2) temporary monitoring wells installed in two (2) of the borings. Soil samples were analyzed for volatile organic compounds (VOCs), total RCRA Metals, formaldehyde, and ethylene glycol. Groundwater samples were analyzed for VOCs, formaldehyde, and ethylene glycol. Formaldehyde was detected above laboratory detection limits in one (1) soil sample. Barium, chromium, lead, and selenium were detected in the soil samples analyzed at a concentration below their respective soil Notification Concentration (NC) listed in Appendix I of Chapter 391-3-19 of the Rules of Georgia Department of Natural Resources, Environmental Protection Division, Hazardous Site Response, and are believed to be naturally occurring( i.e. not indicative of a release). Formaldehyde was detected in one (1) groundwater sample above the laboratory detection limits. See 9A Site Summary for a more detailed summary of the limited investigation conducted.

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 area where formaldehyde was detected is beneath six-inches of concrete and within the building footprint.

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.

Six-inches of concrete.

**PART II - - RELEASE INFORMATION**

(continued)

Page 3 of 7

27.  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: Mattie Frank Williams

Address: 51 Herring Road, Newnan, GA

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 .05 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: St. Johns Baptist Church\*

Address: St. Johns Circle

\* The current status of this well is unknown. A well survey is included in Attachment 11.

27.  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. SEE ATTACHMENT 9A: Site Summary

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.

SEE ATTACHMENT 9B: Figures 9B2, 9B3, and 9B4

27.  **U.S.G.S. Topographic Map**

Along with this form, you **MUST** submit an original U.S.G.S. topographical map (1:24,000) 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. SEE ATTACHMENT 10: USGS Topographic Map (EPD's copy only).





### **ATTACHMENT 9A: Site Summary**

The Property consists of a 30-acre tract of land and is improved with an 188,000 square foot warehouse/distribution center building and associated asphalt and concrete-paved driveways, parking areas, and truck loading/unloading areas. The Property is located approximately 500-feet north of the intersection of Herring Road and St. Johns Circle in Newnan, Coweta County, Georgia. The Property is referenced as Parcel ID No. 085-5085-001. A tax assessor's map of the Property (refer to **Attachment 9B1**) and a site and area layout (refer to **Attachment 9B2**) are included in **Attachment 9B**.

Based on information and belief, the Property appears to have been wooded and undeveloped land and farmland from as early as 1942 until the existing development was constructed in 1999. No environmentally suspect tenants (i.e. dry cleaners, printers, etc.) are believed to have operated on-site, and no industrial or manufacturing operations have been performed on-site, with the exception of former photographic processing, which was performed when the facility was occupied by Eckerd. Photographic development was previously performed in the southern portion of the first floor in the office area. A below-grade trench was located within the concrete floor in this area. The trench was covered with floor tile in the former development room and exited the southern portion of the building after transecting a former wastewater treatment room. Interviews with persons knowledgeable of the former Property operations indicated that the trench contained piping that conveyed waste water from the photographic development process into a below grade concrete sump located just outside of the southern building wall. The wastewater was then pumped into the 20,000-gallon fiberglass aboveground storage tank (AST) located in this area. The wastewater was then metered into the Coweta County sanitary sewer system. As part of the permit issued by Coweta County, Coweta County required the pretreatment of industrial wastewater generated by the photographic development process prior to discharge into the county sanitary sewer system. At some point in the wastewater collection and storage process, it appears that the water was aerated and treated to comply with Coweta County treatment standards prior to discharge into the sanitary sewer system. The photographic development activities reportedly ceased approximately 10 to 15 years ago. The piping in the trench was reportedly removed and the trench filled with concrete. It appears that the concrete sump remains in-place.

The Property is bound by a K Mart distribution facility on the north, by the Rettco Steel LLC facility to the south, by miscellaneous businesses including Groove Pin Corp., RSC Equipment Rental, Stucco and Stone Depot, Shenandoah Electrical, and Action Tire Company to the east, and to the west by wooded and undeveloped land.

Due to an impending property transaction, on December 19, 2011, GLE Associates, Inc. (GLE), on behalf of the prospective purchaser, advanced a total of six (6) direct push soil borings (B-1 through B-6) at the Property (refer to **Attachment 9B3** for boring locations) to determine if the Property had been impacted by potential releases from the on-site former photographic processing wastewater treatment system. Soil samples were field-screened with a photoionization detector (PID). PID readings ranged from 0.0 to 25.2 parts per million (ppm). No discernable odors or stained soil were noted. Three (3) soil samples were collected and submitted for laboratory analysis, based on PID readings. Soil samples were collected from boring B-2 (B-2-5@5 ft. bgs), B-3 (B-3-10@10 ft. bgs), and B-6 (B-6-5@5ft. bgs) and submitted to Analytical Environmental Services, Inc. (AES) for laboratory analysis. The soil samples were analyzed for VOCs by EPA Method 8260B, total RCRA Metals by EPA Method SW6010B, formaldehyde by EPA Method SW8015 Modified, and ethylene glycol by EPA Method SW8015 Modified. In addition, one (1) background soil sample (BG-1-3@3 ft. bgs) was collected on the eastern portion of the Property and analyzed for total RCRA Metals by EPA Method SW6010B.

Temporary groundwater monitoring wells were installed in two (2) of the borings (B-1 and B-6) using a stainless steel screen point sampler to facilitate the collection of groundwater samples. Groundwater samples were collected from borings B-1 (B-1-GW) and B-6 (B-6-GW) and submitted for laboratory analysis. The groundwater samples were analyzed for VOCs, formaldehyde, and ethylene glycol by the previously referenced methods.

Formaldehyde was detected in soil sample B-2-5@ 5-feet bgs at a concentration of 0.002 milligrams per kilogram (mg/kg). Various metals, including barium, chromium, lead, and selenium were detected at relatively low concentrations in the soil samples analyzed. Barium, lead, and chromium were also detected in the background soil sample. The concentrations of barium, chromium, lead, and selenium were below their respective Response and Remediation Program (RRP) Notification Concentration (NC) and are attributed to naturally occurring

conditions. According to the RRP Appendix I, the detection of formaldehyde at any concentration is the soil NC and is reportable to the RRP. Formaldehyde was also detected in groundwater sample B-5-GW at a concentration of 0.290 milligrams per liter (mg/L). No Maximum Contaminant Level (MCL) has been established for formaldehyde. No other VOCs or other constituents were detected in the soil or groundwater samples analyzed. Soil and groundwater data are presented in **Attachment 9B-4**.

A copy of the laboratory analytical data for the Property, boring logs, and boring location plan are appended in **Attachment 9B** for your review. No actions have been taken to remediate the Property.

A well survey was conducted by GLE to identify drinking water wells in the vicinity of the Property. Based on GLE's visual reconnaissance and door-to-door search, one (1) drinking water well was identified approximately 0.29-mile to the south-southeast of the Property at the St. John Baptist Church facility. No additional information concerning the current status of the St. John Baptist Church well was identified. However, GLE did note the presence of a water meter on the St. John Baptist Church property, which suggests that the facility is connected to a public water source. GLE contacted the Coweta County Water and Sewer Authority (CCWSA) for additional information concerning the St. John Baptist Church water source, and, according to a department representative, the CCWSA provides drinking water to the St. John Baptist Church facility. GLE also identified several drinking water wells to the north-northeast of the Property in association with a small residential area. The closest of these wells was located approximately 0.55-mile to the north-northeast of the Property, and, according to the well owner (name withheld), the drinking water well was currently in use. Further, GLE identified several drinking water wells approximately 0.78-mile to the north of the Property in association with another small residential area. Please be advised, it appears that public water is available in these residential areas; however, landowners may elect to continue using their drinking water well(s). Based on a review of the USGS topographic map for this area, Herring Road appears to be located along a topographic ridge. The inferred groundwater flow direction at the Property and the west side of Herring Road is to the west toward an unnamed tributary of Wahoo Creek. The inferred groundwater flow on the east side of Herring Road is to the east. Therefore, based on the distance from the Property to the nearby wells and the inferred hydrogeologic conditions in the area, it is unlikely that groundwater at the Property would migrate to the east and impact wells located east of Herring Road. The well survey is included in **Attachment 11**.

Based on our information and belief, there are no groundwater users which would be impacted. Therefore, based on the historic development of the Property, lack of exposure, location in an area of lower groundwater pollution susceptibility, and location of the nearest drinking water source, this Property should not be listed on the Hazardous Site Inventory (HSI).

# RELEASE NOTIFICATION/REPORTING FORM

## HAZARDOUS SITES RESPONSE PROGRAM GEORGIA ENVIRONMENTAL PROTECTION DIVISION

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)     | N/A  |         |                |           |  |
| 3  | Tax Map and Parcel ID Number:     | Parcel ID No. 085 5805 001<br>(See Attachment 9B1 for Tax Map) | Acreage | 30             |           |  |
| 4  | Site or Facility Name             | Eckerd Distribution Center                                     |         |                |           |  |
| 5  | Site Street Address               | 36 Herring Road  |         |                |           |  |
| 6  | Site City                         | Newnan   | County  | Coweta         | Zip 30265 |  |
| 7  | Property Owner                    | Eckerd Corporation c/o Rite Aid                                |         |                |           |  |
| 8  | Property Owner Mailing Address    | P.O. Box 3165  |         |                |           |  |
| 9  | Property Owner City               | Harrisburg   | State   | PA             | Zip 17105 |  |
| 10 | Property Owner Telephone No.      |  |         |                |           |  |
| 11 | Site Contact Person               | Joseph J. Notarianni   | Title   | Vice President |           |  |
| 12 | Company Name                      | P.O. Box 3165  |         |                |           |  |
| 13 | Site Contact Mailing Address      |  |         |                |           |  |
| 14 | Site Contact City                 | Harrisburg   | State   | PA             | Zip 17105 |  |
| 15 | Site Contact Telephone No.        | 717-730-7724   |         |                |           |  |
| 16 | Facility Operator                 | NA   | Title   |                |           |  |
| 17 | Company Name                      | NA   |         |                |           |  |
| 18 | Facility Operator Mailing Address | NA   |         |                |           |  |
| 19 | Facility Operator City            | NA   | State   |                | Zip       |  |
| 20 | Facility Operator Telephone No.   | NA   |         |                |           |  |

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.

By: Joseph J. Notarianni, Vice President  
NAME/TITLE

By: \_\_\_\_\_  
SIGNATURE DATE

## PART II - - RELEASE INFORMATION

Page 2 of 7

*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 this release is 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.):**

The date, physical state, and quantity of the release are unknown.

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).**

Soil and groundwater samples were collected from six (6) direct-push borings and one (1) hand auger boring advanced at the site during a limited investigation performed at the site. Four (4) soil samples were collected from the direct push borings and one (1) background soil sample was collected using a hand auger. Two (2) groundwater samples were collected from two (2) temporary monitoring wells installed in two (2) of the borings. Soil samples were analyzed for volatile organic compounds (VOCs), total RCRA Metals, formaldehyde, and ethylene glycol. Groundwater samples were analyzed for VOCs, formaldehyde, and ethylene glycol. Formaldehyde was detected above laboratory detection limits in one (1) soil sample. Barium, chromium, lead, and selenium were detected in the soil samples analyzed. Formaldehyde was detected in one (1) groundwater sample above the laboratory detection limits. See 9A Site Summary for a more detailed summary of the limited investigation conducted.

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 area where formaldehyde was detected is beneath six-inches of concrete and within the building footprint.

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.**

Six-inches of concrete.

**PART II - - RELEASE INFORMATION**

(continued)

Page 3 of 7

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: Mattie Frank Williams

Address: 51 Herring Road, Newnan, GA

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 .05 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: St. Johns Baptist Church\*

Address: St. Johns Circle

\* The current status of this well is unknown. A well survey is included in Attachment 11.

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. SEE ATTACHMENT 9A: Site Summary

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. SEE ATTACHMENT 9B: Figures 9B2, 9B3, and 9B4

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

Along with this form, you **MUST** submit an original U.S.G.S. topographical map (1:24,000) 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. SEE ATTACHMENT 10: USGS Topographic Map (EPD's copy only).





**ATTACHMENT 9A: Site Summary**

The Property consists of a 30-acre tract of land and is improved with an 188,000 square foot warehouse/distribution center building and associated asphalt and concrete-paved driveways, parking areas, and truck loading/unloading areas. The Property is located approximately 500-feet north of the intersection of Herring Road and St. Johns Circle in Newnan, Coweta County, Georgia. The Property is referenced as Parcel ID No. 085-5085-001. A tax assessor's map of the Property (refer to **Attachment 9B1**) and a site and area layout (refer to **Attachment 9B2**) are included in **Attachment 9B**.

Based on information and belief, the Property appears to have been wooded and undeveloped land and farmland from as early as 1942 until the existing development was constructed in 1999. No environmentally suspect tenants (i.e. dry cleaners, printers, etc.) are believed to have operated on-site, and no industrial or manufacturing operations have been performed on-site, with the exception of former photographic processing, which was performed when the facility was occupied by Eckerd. Photographic development was previously performed in the southern portion of the first floor in the office area. A below-grade trench was located within the concrete floor in this area. The trench was covered with floor tile in the former development room and exited the southern portion of the building after transecting a former wastewater treatment room. Interviews with persons knowledgeable of the former Property operations indicated that the trench contained piping that conveyed waste water from the photographic development process into a below grade concrete sump located just outside of the southern building wall. The wastewater was then pumped into the 20,000-gallon fiberglass aboveground storage tank (AST) located in this area. The wastewater was then metered into the Coweta County sanitary sewer system. As part of the permit issued by Coweta County, Coweta County required the pretreatment of industrial wastewater generated by the photographic development process prior to discharge into the county sanitary sewer system. At some point in the wastewater collection and storage process, it appears that the water was aerated and treated to comply with Coweta County treatment standards prior to discharge into the sanitary sewer system. The photographic development activities reportedly ceased approximately 10 to 15 years ago. The piping in the trench was reportedly removed and the trench filled with concrete. It appears that the concrete sump remains in-place.

The Property is bound by a K Mart distribution facility on the north, by the Rettco Steel LLC facility to the south, by miscellaneous businesses including Groove Pin Corp., RSC Equipment Rental, Stucco and Stone Depot, Shenandoah Electrical, and Action Tire Company to the east, and to the west by wooded and undeveloped land.

Due to an impending property transaction, on December 19, 2011, GLE Associates, Inc. (GLE) advanced a total of six (6) direct push soil borings (B-1 through B-6) at the Property (refer to **Attachment 9B3** for boring locations) to determine if the Property had been impacted by potential releases from the on-site former photographic processing wastewater treatment system. Soil samples were field-screened with a photoionization detector (PID). PID readings ranged from 0.0 to 25.2 parts per million (ppm). No discernable odors or stained soil were noted. Three (3) soil samples were collected and submitted for laboratory analysis, based on PID readings. Soil samples were collected from boring B-2 (B-2-5@5 ft. bgs), B-3 (B-3-10@10 ft. bgs), and B-6 (B-6-5@5ft. bgs) and submitted to Analytical Environmental Services, Inc. (AES) for laboratory analysis. The soil samples were analyzed for VOCs by EPA Method 8260B, total RCRA Metals by EPA Method SW6010B, formaldehyde by EPA Method SW8015 Modified, and ethylene glycol by EPA Method SW8015 Modified. In addition, one (1) background soil sample (BG-1-3@3 ft. bgs) was collected on the eastern portion of the Property and analyzed for total RCRA Metals by EPA Method SW6010B.

Temporary groundwater monitoring wells were installed in two (2) of the borings (B-1 and B-6) using a stainless steel screen point sampler to facilitate the collection of groundwater samples. Groundwater samples were collected from borings B-1 (B-1-GW) and B-6 (B-6-GW) and submitted for laboratory analysis. The groundwater samples were analyzed for VOCs, formaldehyde, and ethylene glycol by the previously referenced methods.

Formaldehyde was detected in soil sample B-2-5@ 5-feet bgs at a concentration of 0.002 milligrams per kilogram (mg/kg). Various metals, including barium, chromium, lead, and selenium were detected at relatively low concentrations in the soil samples analyzed. Barium, lead, and chromium were also detected in the background soil sample. The concentrations of barium, chromium, lead, and selenium were below their respective Response and Remediation Program (RRP) Notification Concentration (NC) and are attributed to naturally occurring

conditions. According to the RRP Appendix I, the detection of formaldehyde at any concentration is the soil NC and is reportable to the RRP. Formaldehyde was also detected in groundwater sample B-5-GW at a concentration of 0.290 milligrams per liter (mg/L). No Maximum Contaminant Level (MCL) has been established for formaldehyde. No other VOCs or other constituents were detected in the soil or groundwater samples analyzed. Soil and groundwater data are presented in **Attachment 9B-4**.

A copy of the laboratory analytical data for the Property, boring logs, and boring location plan are appended in **Attachment 9B** for your review. No actions have been taken to remediate the Property.

A well survey was conducted by GLE to identify drinking water wells in the vicinity of the Property. Based on GLE's visual reconnaissance and door-to-door search, one (1) drinking water well was identified approximately 0.29-mile to the south-southeast of the Property at the St. John Baptist Church facility. No additional information concerning the current status of the St. John Baptist Church well was identified. However, GLE did note the presence of a water meter on the St. John Baptist Church property, which suggests that the facility is connected to a public water source. GLE contacted the Coweta County Water and Sewer Authority (CCWSA) for additional information concerning the St. John Baptist Church water source, and, according to a department representative, the CCWSA provides drinking water to the St. John Baptist Church facility. GLE also identified several drinking water wells to the north-northeast of the Property in association with a small residential area. The closest of these wells was located approximately 0.55-mile to the north-northeast of the Property, and, according to the well owner (name withheld), the drinking water well was currently in use. Further, GLE identified several drinking water wells approximately 0.78-mile to the north of the Property in association with another small residential area. Please be advised, it appears that public water is available in these residential areas; however, landowners may elect to continue using their drinking water well(s). Based on a review of the USGS topographic map for this area, Herring Road appears to be located along a topographic ridge. The inferred groundwater flow direction at the Property and the west side of Herring Road is to the west toward an unnamed tributary of Wahoo Creek. The inferred groundwater flow on the east side of Herring Road is to the east. Therefore, based on the distance from the Property to the nearby wells and the inferred hydrogeologic conditions in the area, it is unlikely that groundwater at the Property would migrate to the east and impact wells located east of Herring Road. The well survey is included in **Attachment 11**.

Based on our information and belief, there are no groundwater users which would be impacted. Therefore, based on the historic development of the Property, lack of exposure, location in an area of lower groundwater pollution susceptibility, and location of the nearest drinking water source, this Property should not be listed on the Hazardous Site Inventory (HSI).

5933

# 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

FEB 10 2012

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:     | 04-00206                                   | Acreage | 385.79                  |           |
| 4  | Site or Facility Name             | Frederica Golf Club Maintenance Facility   |         |                         |           |
| 5  | Site Street Address               | 30 Pikes Bluff Road                        |         |                         |           |
| 6  | Site City                         | St. Simons Island                          | County  | Glynn                   | Zip 31522 |
| 7  | Property Owner                    | Frederica Hospitality Group, LLC           |         |                         |           |
| 8  | Property Owner Mailing Address    | 450 E. Las Olas Blvd. Suite 1500           |         |                         |           |
| 9  | Property Owner City               | Ft. Lauderdale                             | State   | FL                      | Zip 33301 |
| 10 | Property Owner Telephone No.      |  |         |                         |           |
| 11 | Site Contact Person               | Mr. Mike Shalley                           | Title   | Director of Development |           |
| 12 | Site Contact Company Name         | Frederica Development Group, LLC           |         |                         |           |
| 13 | Site Contact Mailing Address      | 150 Frederica Stables Drive                |         |                         |           |
| 14 | Site Contact City                 | St. Simons Island                          | State   | GA                      | Zip 31522 |
| 15 | Site Contact Telephone No.        | Office (912) 634-1500; Cell (904) 502-4618 |         |                         |           |
| 16 | Facility Operator Contact Person  | Mr. Jon Hatten                             | Title   | Superintendent          |           |
| 17 | Facility Operator Company Name    | Frederica Golf Club                        |         |                         |           |
| 18 | Facility Operator Mailing Address | 30 Pikes Bluff Road                        |         |                         |           |
| 19 | Facility Operator City            | St. Simons Island                          | State   | GA                      | Zip 31522 |
| 20 | Facility Operator Telephone No.   | (912) 634-1500                             |         |                         |           |

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 J. Shalley  
NAME (Please type or print)  
[Signature]  
SIGNATURE

Director of Development  
TITLE  
2/7/12  
DATE

## 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:**

The exact source of the regulated substance (arsenic) detected in groundwater is unknown. Results of a groundwater sampling event that took place at the site in September 2010 were unable to be duplicated during recent sampling event in December 2011.

**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(s) are 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).**

Soil and groundwater samples were initially collected and analyzed for herbicides, pesticides, petroleum contaminants, and/or metals in September 2010 as part of a property transaction. Subsequent groundwater sampling was conducted in December 2011, including the collection of two (2) groundwater samples from previous groundwater sample locations, as well as the collection of one (1) groundwater sample to determine background concentrations for arsenic, barium, and chromium at the site.

**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.**

An approximate 8-ft. high chain-link fence surrounds the property. The entrance is gated and a code must be entered into a key pad outside of the gate in order to gain access to the site. Only employees, subcontractors and authorized personnel are provided the code.

**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.**

Not applicable.

## 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: Byron D. & Karole Sue Reeves

Address: 17 Carriage Drive, St. Simons Island, Georgia 31522

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: Brunswick Glynn County Joint Water & Sewer Commission

Address: 101 Hampton River Club Marina Drive, St. Simons Island, Georgia 31522

\*The closest drinking water well is located in an upgradient position from the area of concern, and a hydrogeologic barrier exists between the well and the area of concern.

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>.



### Frederica Golf Club Maintenance Facility

The area of concern is located within a drainage ditch adjacent to the Frederica Golf Club Maintenance Facility located at 30 Pikes Bluff Road, in St. Simons Island, in Glynn County, Georgia. A Project Location Map is provided as **Figure 1**, and a copy of a 2010 aerial photograph, annotated with the approximate boundaries of the parent parcel (Glynn County Parcel ID 04-00206) and the Frederica Golf Club Maintenance Facility, is provided as **Figure 2**. Prior to the facility's construction in 2005, the site vicinity was undeveloped, wooded land.

The drainage ditch receives stormwater runoff from the Frederica Golf Course Maintenance Facility; the slope of the drainage ditch is from north to south. Groundwater flow within the drainage ditch is primarily to the southwest into the adjacent wetlands and/or into the Frederica lake systems which eventually outflows to the west into the Frederica River or to the south into adjacent wetlands, which also eventually flows to marsh and Frederica River. A Limited Topographic Survey for the Frederica Golf Club Maintenance Facility and vicinity is included in **Attachment 3**. Additionally, marsh associated with Jones Creek and Wilson Creek serve as a hydrogeological barrier between the area of concern and the closest potable water well (within 3 miles) located on the north end of St. Simons Island.

As part of a pending real estate transaction, ESI collected soil and groundwater samples at two (2) soil boring locations within the drainage ditch in September 2010; a Sample Location Map is include as **Figure 3**. One (1) sediment sample was collected from the 0-0.5 ft. below ground surface (bgs) depth interval at each soil boring location. After sediment sampling activities were completed, the soil borings were advanced using a stainless steel hand auger to the top of the local groundwater table which was encountered at approximately 2-ft. bgs. The soil borings were then converted to temporary groundwater monitoring wells (TMW-2 and TMW-3) for collection of groundwater samples. All soil and groundwater samples were submitted to a NELAC-certified laboratory for analyses of contaminants of concern. More specifically, sediment sample SE-2 and groundwater sample TMW-2 was submitted for analysis of herbicides, pesticides, petroleum contaminants, 8-RCRA metals, and iron via EPA Methods 8081, 8141, 8151, 8260, 8270C, and 6020; sediment sample SE-3 and groundwater sample TMW-3 was submitted for analysis of herbicides, pesticides, 8-RCRA metals, and iron via EPA Methods 8081, 8141, 8151, and 6020. Analyses of the sediment samples SE-2 and SE-3 yielded no concentrations above the applicable laboratory method detection limits and/or the applicable Georgia Notification Conditions (NCs) for any parameters in the analytical test suite. Analysis of groundwater sample TMW-2 yielded low-level concentrations of barium and chromium at 0.023 mg/L and 0.005 mg/L, respectively. Analysis of groundwater sample TMW-3 yielded arsenic, barium, and chromium at 0.042 mg/L, 0.029 mg/L, and 0.006 mg/L, respectively. No other parameters within the analytical test suites were identified in concentrations above the applicable laboratory method detection limits within groundwater samples TMW-2 and TMW-3. Refer to **Attachment 4** for the laboratory analytical results.

In December 2011, ESI remobilized to the site to install two (2) temporary groundwater monitoring wells (TMW-2A and TMW-3A) within the drainage ditch in the vicinity of previous temporary monitoring well locations TMW-2 and TMW-3, as well as to install one (1) temporary monitoring well (TMW-BG) within a wooded portion of the site, where no impacts or suspect conditions were previously identified, in order to establish background concentrations for arsenic, barium, and chromium. Refer to **Figure 3** for a depiction of the temporary monitoring well locations. A total of three (3) groundwater samples (TMW-2A, TMW-3A, and TMW-BG) were collected from the temporary monitoring well locations and submitted to a NELAC-certified laboratory for analyses of arsenic, barium, and chromium using EPA Method 6010. Analysis of groundwater sample TMW-2A yielded arsenic, barium and chromium at 0.020 mg/L, 0.0057 mg/L, and 0.0040 mg/L, respectively. Analysis of groundwater sample TMW-3 yielded barium and chromium at 0.049 mg/L and 0.0030 mg/L, respectively. Analysis of groundwater sample TMW-BG yielded barium at 0.047 mg/L. No other parameters within the analytical test suites were identified in concentrations above the applicable laboratory method detection limits within groundwater samples TMW-2, TMW-3, and TMW-BG. Refer to **Attachment 4** for the laboratory analytical results.

In accordance with Rule 391-3-19, Appendix II Reportable Quantities Screening Method (RQSM), ESI has calculated the on-site exposure pathway and groundwater pathway scores for arsenic detected above HSRA notification concentrations at the *property*; refer to **Attachment 5** for the calculations used to determine these scores. The on-site exposure pathway score is 0, below the applicable threshold score of 20, and the groundwater pathway score is 8.13, below the applicable threshold score of 10. Based on these RQSM scores, ESI has determined that the arsenic detected at the *property* does not exceed a reportable quantity, and requests that the Georgia EPD issue a letter confirming that the *property* will not be listed on the Hazardous Site Inventory.

5934.

# 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

FEB 10 2012

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)     |   |         |                                  |           |
| 3  | Tax Map and Parcel ID Number:     | New ID Number applied for (previously part of 14-0046-0010-233-2) | Acreage | 2.46                             |           |
| 4  | Site or Facility Name             | Fort-Old Wheat Street Tract                                       |         |                                  |           |
| 5  | Site Street Address               | 315 Irwin Street  |         |                                  |           |
| 6  | Site City                         | Atlanta   | County  | Fulton                           | Zip 30312 |
| 7  | Property Owner                    | Board of Regents of the University System of Georgia              |         |                                  |           |
| 8  | Property Owner Mailing Address    | 270 Washington Street, SW   |         |                                  |           |
| 9  | Property Owner City               | Atlanta   | State   | Georgia                          | Zip 30334 |
| 10 | Property Owner Telephone No.      | (404) 232-1212  |         |                                  |           |
| 11 | Site Contact Person               | Joan B. Sasine  | Title   | Attorney                         |           |
| 12 | Site Contact Company Name         | Bryan Cave LLP  |         |                                  |           |
| 13 | Site Contact Mailing Address      | 1201 W. Peachtree Street, NW, 14 <sup>th</sup> Floor              |         |                                  |           |
| 14 | Site Contact City                 | Atlanta   | State   | Georgia                          | Zip 30309 |
| 15 | Site Contact Telephone No.        | (404) 572-6647  |         |                                  |           |
| 16 | Facility Operator Contact Person  | Lee Nelson  | Title   | Director of Real Estate Services |           |
| 17 | Facility Operator Company Name    | See #7 above  |         |                                  |           |
| 18 | Facility Operator Mailing Address | See #7 above  |         |                                  |           |
| 19 | Facility Operator City            | See #7 above  | State   |                                  | Zip       |
| 20 | Facility Operator Telephone No.   | See #7 above  |         |                                  |           |

21. CERTIFICATION --I certify under penalty of law that I am the legal representative of 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.

Joan B. Sasine \_\_\_\_\_ Special Assistant Attorney General  
 NAME (Please type or print) TITLE  
 \_\_\_\_\_ February 9, 2012  
 SIGNATURE 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:**

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.):**

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).**

*Soil and groundwater sampling is being performed pursuant to the Hazardous Site Reuse & Redevelopment Act. No groundwater remediation is planned.*

**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.**  
N.A.

- 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 \_\_\_\_\_ 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: \_\_\_\_\_

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: \_\_\_\_\_

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.

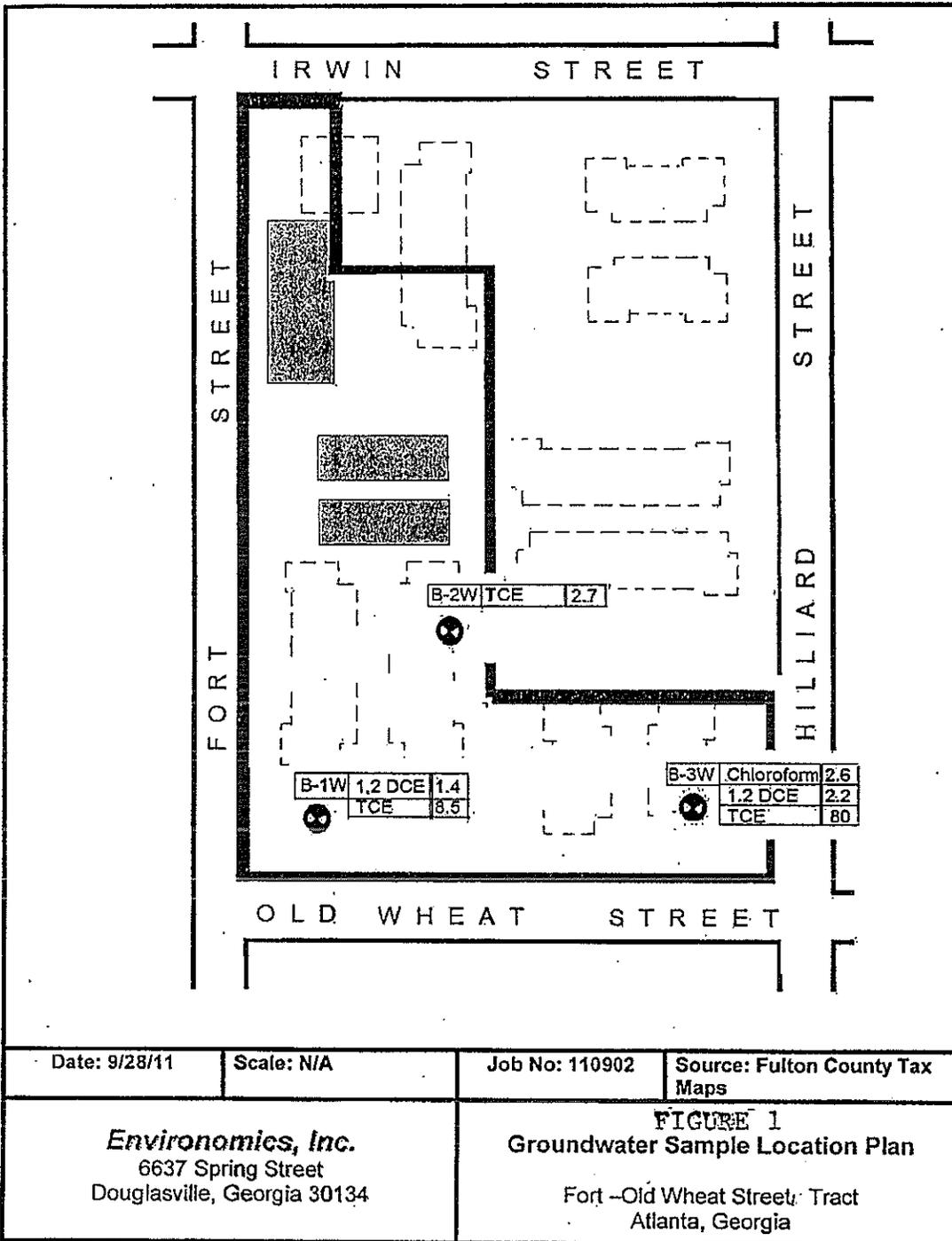
B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used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

## **9A. Summary**

A former owner of the property filed a HSRA notification on January 7, 2011 for a release of tetrachloroethylene and trichloroethylene in groundwater. On September 28, 2011 Environomics performed Phase II testing on behalf of the Board of Regents ("BOR"). In addition to trichloroethylene, cis-1,2,dichloroethene and chloroform were found in the groundwater. See Figure 1 for location of the groundwater samples and Attachment A for test results. The BOR has a provisional limitation of liability for this property and two (2) adjacent properties, pursuant to the Hazardous Site Reuse & Redevelopment Act. See letter from Madeleine Kellam included as Attachment B.

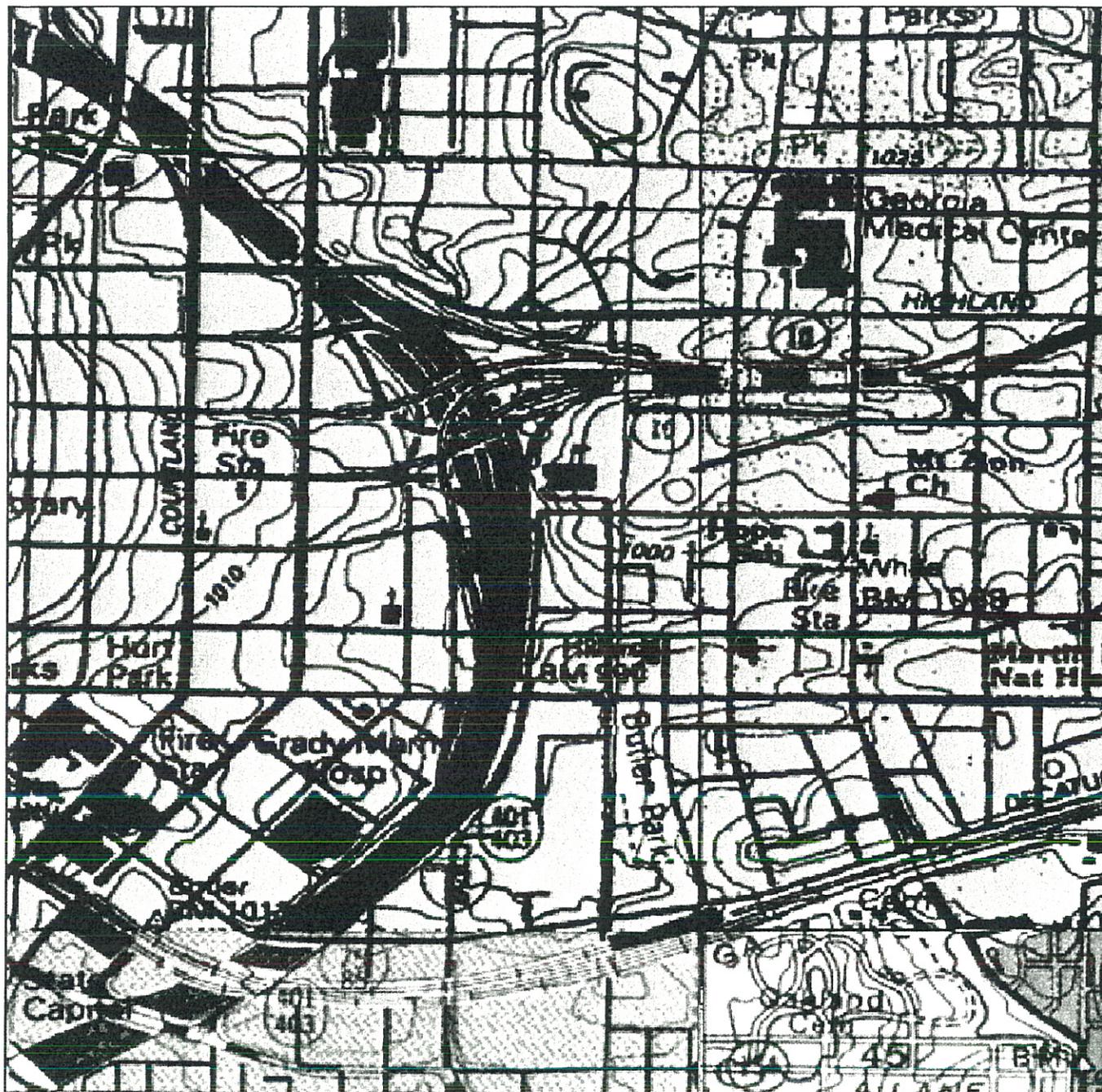




# 10. Site Location Map

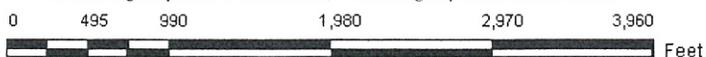
Topo : 0.75 Mile Radius

103 FORT ST, ATLANTA GA 30312



SOURCE: SCANNED USGS TOPOGRAPHIC QUADRANGLES  
SCANNED BY MAPTECH AND USGS  
DISTRIBUTED AUGUST, 2005.

Black Rings Represent 1/4 Mile Radii; Red Ring Represents 500 ft. Radius



Data Supplied by:

Prepared by FirstSearch Technology Corporation

JOB NO.



Map Name: NORTHWEST ATLANTA  
Map Reference Code: 33084-G4-TF-024

Date Created: 1999--  
Contour Interval: 10 feet

Date Revised: Unknown  
Elevation:

FIGURE NO.

1





5939

# 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

FEB 13 2012

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)     | NA  |         |                                    |           |
| 3  | Tax Map and Parcel ID Number:     | C001-0005-003; 004; 005   | Acreage | Approx. 1 acre                     |           |
| 4  | Site or Facility Name             | NA  |         |                                    |           |
| 5  | Site Street Address               | 206 Church St./109 Tennessee St.; 212 Church St.; 101 Tennessee St. |         |                                    |           |
| 6  | Site City                         | Cartersville  | County  | Bartow                             | Zip 30120 |
| 7  | <del>REDACTED</del>               | Prospective Purchaser: Arista Development, LLC                      |         |                                    |           |
| 8  | Property Owner Mailing Address    | 520 Providence Hwy  |         |                                    |           |
| 9  | Property Owner City               | Norwood   | State   | MA                                 | Zip 02062 |
| 10 | Property Owner Telephone No.      | 781-769-5900  |         |                                    |           |
| 11 | Site Contact Person               | Randall D. Quintrell  | Title   | Attorney for Prospective Purchaser |           |
| 12 | Site Contact Company Name         | Randall D. Quintrell, P.C.  |         |                                    |           |
| 13 | Site Contact Mailing Address      | 999 Peachtree St., NE, 22nd Floor                                   |         |                                    |           |
| 14 | Site Contact City                 | Atlanta   | State   | GA                                 | Zip 30309 |
| 15 | Site Contact Telephone No.        | 404-853-8366  |         |                                    |           |
| 16 | Facility Operator Contact Person  | NA  | 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.

**SEE ATTACHED CERTIFICATION STATEMENT**

NAME (Please type or print)

TITLE

## 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:**

Unknown but thought to be from historical use of a portion of the site as an automobile service station.

**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.):**

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).**

Prospective purchaser has conducted Phase I and Phase II environmental site assessments.

**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.
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**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.**

Approximately 95% of the site is currently covered by building footprint and asphalt parking areas. When redeveloped for commercial use, current plans call for approximately 80%-85% of site to be covered by building footprint and asphalt parking area.

## 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

Address: unknown

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

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>.

21. **CERTIFICATION** – I certify under penalty of law that I am the representative of the Prospective Purchaser 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.

**Prospective Purchaser: Arista Development, LLC**

By: 

Name: GREGORY BOTOLWAIN

Title: MANAGER

Date: February 10, 2012

## SITE SUMMARY

The site consists of three parcels comprising the northeast quadrant of the intersection of Church Street and Tennessee Street, Cartersville, Georgia. One parcel is currently a fitness club; one parcel a vacant dental office; and the third parcel a former automobile service station now used a wheel/tire store. According to FirstSearch, seven 1500-gallon and one 550-gallon USTs were removed in 1992 from the site. According to EPD's UST Section, the tanks are considered closed for regulatory purposes even though no closure report exists. The Phase I ESA identified the former service station with USTs as a recognized environmental condition (REC). Also, Jerry's Modern Cleaners, located on the northern adjoining property, has performed on-site dry cleaning since the 1980s and was determined to be a REC. The attached Figure 2 shows the relative locations of the various parcels comprising the site.

The Phase II ESA consisted of 16 soil borings, 8 of which were converted into temporary monitoring wells. Attached Figures 2 and 5 show the locations of the borings and the direction of groundwater flow.

**Soil Sampling** – Soil samples were analyzed for VOCs, PAHs and metals. The only VOC detected at HSRA notification level was xylene in one sample at 27-28 feet deep at 20 mg/kg. No PAHs were detected above (or even close to) HSRA notification levels. The only metal detected in soil samples indicative of a "release" above HSRA notification levels was lead in one surface sample slightly above the notification level at 430 mg/kg.

**Groundwater Sampling** – Groundwater samples from eight temporary monitor wells were analyzed for VOCs, PAHs, and metals. Certain VOCs and PAHs were detected at relatively low levels. See Part IV of this filing. The detection of these compounds in groundwater samples is consistent with the prior use of the site as an automobile service station with multiple underground tanks.

**Receptor Search** – The site is located in a commercial area within downtown Cartersville. The nearest downgradient residential area is approx. 750 feet southeast. A well inventory was conducted including reviewing information in EPD's files. No public or private wells were located within 3 miles downgradient of the site. The City of Cartersville uses surface water from Lake Allatoona for potable supply. The water intake is approx. 3.7 miles east of the site.

### 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 Registry Number | Highest Concentration Detected Between 0-6 Inches (Specify Units) | Highest Concentration Detected Between 6-24 Inches (Specify Units) | Highest Concentration Detected Greater Than 24 Inches (Specify Units) |
|---------------------|---------------------|---|--|---|
| Lead                | 7439921             | NA  | 430 mg/kg  | 93 mg/kg  |
| Xylenes             | 1330207             | NA  | NA   | 20 mg/kg  |
|                     |                     |   |  |   |
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## 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 Registry Number | Highest Detected Concentration<br>(Specify Units) | Sample Depth Below Ground Surface<br>(Feet) |
|-----------------------------|---------------------|---|---|
| Benzene                     | 71432               | 0.98 mg/L   | See Att. Table 1                            |
| Toluene                     | 108883              | 0.82 mg/L   | See Att. Table 1                            |
| Ethylbenzene                | 100414              | 3.10 mg/L   | See Att. Table 1                            |
| Xylenes                     | 1330207             | 12.0 mg/L   | See Att. Table 1                            |
| Methyl Tertiary Butyl Ether | 1634044             | 0.14 mg/L   | See Att. Table 1                            |
|                             |                     |   |   |
| n-Butylbenzene              | 104518              | 0.024 mg/L  | See Att. Table 1                            |
| sec-Butylbenzene            | 135988              | 0.019 mg/L  | See Att. Table 1                            |
| tert-Butylbenzene           | 98066               | 0.0015 mg/L                                       | See Att. Table 1                            |
| Isopropylbenzene            | 98828               | 0.12 mg/L   | See Att. Table 1                            |
| p-Isopropyltoluene          | 99876               | 0.028 mg/L  | See Att. Table 1                            |
| 1,2,4 – Trimethylbenzene    | 95636               | 1.8 mg/L  | See Att. Table 1                            |
| 1,2,3 – Trimethylbenzene    | 526738              | 0.41 mg/L   | See Att. Table 1                            |
| 1,3,5 – Trimethylbenzene    | 108678              | 0.52 mg/L   | See Att. Table 1                            |
| n-Propylbenzene             | 103651              | 0.30 mg/L   | See Att. Table 1                            |
| Anthracene                  | 120127              | 0.00014 mg/L                                      | See Att. Table 1                            |
| Acenaphthene                | 83329               | 0.00039 mg/L                                      | See Att. Table 1                            |

|                     |        |              |                  |
|---------------------|--------|--------------|------------------|
| Fluoranthene        | 206440 | 0.00005 mg/L | See Att. Table 1 |
| Fluorene            | 86737  | 0.00049 mg/L | See Att. Table 1 |
| Naphthalene         | 91203  | 0.29 mg/L    | See Att. Table 1 |
| 1-Methylnaphthalene | 90120  | 0.05 mg/L    | See Att. Table 1 |
| 2-Methylnaphthalene | 91576  | 0.097 mg/L   | See Att. Table 1 |
| Pyrene              | 129000 | 0.0001 mg/L  | See Att. Table 1 |
| Phenathrene         | 85018  | 0.00047 mg/L | See Att. Table ! |

5935

# 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

FEB 14 2012

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)     |                            |         |              |           |
| 3  | Tax Map and Parcel ID Number:     | L06-06009000               | Acreage | 1.96         |           |
| 4  | Site or Facility Name             | Fancy Pants Dry Cleaners   |         |              |           |
| 5  | Site Street Address               | 4128 Hwy 42 S              |         |              |           |
| 6  | Site City                         | Locust Grove               | County  | Henry        | Zip 30240 |
| 7  | Property Owner                    | JEEBA, LLC.                |         |              |           |
| 8  | Property Owner Mailing Address    | 4128 Hwy 42 S.             |         |              |           |
| 9  | Property Owner City               | Locust Grove               | State   | GA           | Zip 30248 |
| 10 | Property Owner Telephone No.      | 770-957-3150               |         |              |           |
| 11 | Site Contact Person               | Harry Patel                | Title   | Owner        |           |
| 12 | Site Contact Company Name         | JEEBA, LLC                 |         |              |           |
| 13 | Site Contact Mailing Address      | 4128 Hwy. 42 S.            |         |              |           |
| 14 | Site Contact City                 | Locust Grove               | State   | GA           | Zip 30248 |
| 15 | Site Contact Telephone No.        | 770-957-3150               |         |              |           |
| 16 | Facility Operator Contact Person  | John and Jennifer Conarton | Title   | Joint Owners |           |
| 17 | Facility Operator Company Name    | Fancy Pants Cleaners       |         |              |           |
| 18 | Facility Operator Mailing Address | 4128 Hwy 42 S.             |         |              |           |
| 19 | Facility Operator City            | Locust Grove               | State   | GA           | Zip 30248 |
| 20 | Facility Operator Telephone No.   | 678-432-2265               |         |              |           |

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.

HARSHADKIMAR G. PATEL      IT'S MEMBER  
NAME (Please type or print)      TITLE  
H G Patel      01/30/12  
SIGNATURE      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:**

**On-site dry cleaning facility. Dry cleaning facility was observed during field activities conducted during a Phase II ESA.**

**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.):**

**Unkown release date. Physical state is assumed to have been a liquid and the quantity is unkown, but based on concentrations found at the subject site, it is believed to have been a small quantity release.**

**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 permanent monitoring well was installed immediately adjacent to the Geo Probe boring where the initial discovery was made. Once the monitoring well was installed and developed the monitoring well was sampled utilizing low-flow sampling techniques. A one mile radius well search was conducted by Prater & York. The search resulted in the observation of one municipal well, to the north, and five private wells within one mile. Upon further investigation, Prater & York determined that three of the private wells have been abandoned and are inactive. The two remaining private wells are located to the east of the subject property and are either of the same topographic setting or topographically higher than the subject property. Additionally, a Corrective Action Plan-Part A (CAP-A) was conducted for the retail petroleum outlet, which is located on the subject property. In conjunction with the CAP-A, directional groundwater flow was determined for the subject property. The flow was determined to be to the southeast, which would make the municipal well up gradient of the subject property and the private wells cross gradient. A review of a topographic map of the area supports groundwater flow being in this direction.**

**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.**

## 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  
 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: Eugene & Lisa Roberts

Address: 40 Roberts Rd.

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: Annie Lois & Etal Miller

Address: 4216 Hwy. 42 Locust Grove, GA

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 Registry Number | Highest Concentration Detected Between 0-6 Inches (Specify Units) | Highest Concentration Detected Between 6-24 Inches (Specify Units) | Highest Concentration Detected Greater Than 24 Inches (Specify Units) |
|---------------------|---------------------|---|--|---|
| 54Tetrachloroethene | 127-18-4            | 0.0307 mg/kg  | NA   |   |
| 2-Butanone (MEK)    | 78-93-3             | 0.0307 mg/kg  | NA   |   |
| Acetone             | 67-64-1             | 2.14 mg/kg  | NA   |   |
| Toluene             | 108-88-3            | 0.00844 mg/kg   | NA   |   |
| Total Xylenes       | 179601-23-1         | 0.00981 mg/kg   | NA   |   |
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**HSRA Release Notification – Site Summary**  
**Fancy Pants Cleaners**  
**4128 Hwy 42 S. Locust Grove, Henry County, Georgia**

The subject property is a 1.96 acre parcel of land developed with a strip shopping center. The strip shopping center contains both a retail petroleum outlet as well as a dry cleaning facility. Prater & York conducted a Phase II Environmental Site Assessment (ESA) at the subject property in September 2011. During the Phase II ESA concentrations of tetrachloroethene (PCE) and trichloroethene (TCE) were detected in ground water samples. Additionally, concentrations of PCE were found in soil samples, however, these concentrations were below the NC (0.0307 ug/L being the highest concentration). Prater & York has addressed the petroleum release by completing a Corrective Action Plan- Part A (CAP-A) and submitting it to the Georgia EPD's USTMP. The CAP-A is currently under review.

Prater & York returned to the subject property in January 2012 to install a permanent monitoring well within close proximity to the GeoProbe boring where the concentrations of PCE (15 ug/L) and TCE (5.5 ug/L) were detected in groundwater. A Site Map depicting the locations of the Geo Probe borings as well as the monitoring well is included as Figure 1. Following the installation and development of the monitoring well, the well was sampled utilizing the low-flow sampling method. The groundwater sample collected from the low-flow sampling event was reported as having 14 ug/L of PCE and <5 ug/L of TCE.

Prater & York conducted a well survey, with a search area of 1 mile from the subject property. One municipal well, belonging to the City of Locust Grove, was identified as being due north and approximately 1 mile from the subject site. Prater & York observed five private wells within the 1 mile search. Upon further inspection it was determined that three of the wells have been abandoned. The remaining two wells are located to the east of the subject property at an equal or higher topographic setting. Locations of both the active wells, as well as the abandoned wells, are included on Figure 2.

As part of the CAP-A, groundwater flow at the subject site was determined to be to the southeast. A Potentiometric Surface Map is included as Figure 3. A groundwater elevation summary table from the CAP-A is also included. Review of a topographic map of the area indicates the presence of an intermittent stream and topographical features which also support groundwater flow being to the southeast. Based on the directional groundwater flow to the southeast, the municipal wells identified are located upgradient of the subject property and the active private wells are located cross gradient to the subject site.

Based on the above information, the wells identified should not be included in the Reportable Quantities Screening Method scoring for the subject site. Therefore, Prater & York respectfully requests that the subject property not be listed on the HSI.

**MORRIS, MANNING & MARTIN**

A LIMITED LIABILITY PARTNERSHIP

ATTORNEYS AT LAW  
1600 ATLANTA FINANCIAL CENTER  
3343 PEACHTREE ROAD, N.E.

**ATLANTA, GEORGIA 30326-1044**

TELEPHONE 404 233-7000  
FACSIMILE 404 365-9532  
E-MAIL GLP@MMMLAW.COM

GERALD L. POUNCEY, JR.  
DIRECT DIAL 404 504-7738

WASHINGTON, D.C. OFFICE

**MORRIS, MANNING & MARTIN, LLP**  
1333 H STREET N.W., SUITE 820  
WASHINGTON, DC 20005  
TELEPHONE 202 408-5153  
FACSIMILE 202 408-5146

NORTHSIDE OFFICE

SUITE 300  
990 HAMMOND DRIVE  
ATLANTA, GEORGIA 30328  
TELEPHONE 404 255-6900  
FACSIMILE 404 843-2317

**RECEIVED**  
**Georgia EPD**

February 14, 2012

FEB 15 2012

**VIA FEDERAL EXPRESS**

Mr. David Brownlee  
Hazardous Sites Response Program  
2 Martin Luther King, Jr. Drive, SE  
Suite 1462 East  
Atlanta, GA 30334-9000

**Response and Remediation Program**

Re: North Decatur Square Shopping Center, 2863-2875 North Decatur Road, Decatur,  
Georgia 30303

Mr. Brownlee:

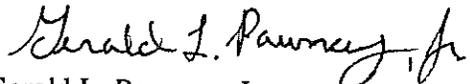
Thank you for meeting with me this morning. Enclosed with this FedEx is the HSRA notification submittal for the North Decatur Square Shopping Center. As we discussed, I represent the buyer who submitted a Brownfield Corrective Action Plan which was approved in November, 2011. We have since provided the test data to the seller. The seller has asked me to submit the enclosed notification package and act as a contact point.

We would hope to have a review and determination regarding listing prior to March 30<sup>th</sup> as that is the day the contract requires that purchaser close on acquisition of the property.

Thank you for considering this submittal.

Sincerely,

MORRIS, MANNING & MARTIN, L.L.P.

  
Gerald L. Pouncey, Jr.

GLP:sbb  
Enclosure

5937

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Georgia EPD

FEB 15 2012

Response and Remediation Program

JM Boles Family Limited Partnership  
1122 Milledge Street  
East Point, Georgia 30344

February 7, 2012

RECEIVED FEB 10 2012

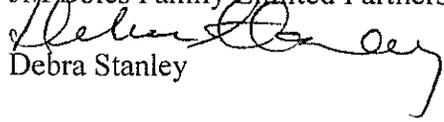
State of Georgia  
Department of Natural Resources  
EPA Division  
4220 International Pkwy, Suite 101  
Atlanta, Georgia

To Whom It May Concern:

One of our tenants had a Phase II Environmental Site Assessment performed at the property they are leasing from us at 2251 Sylvan Road, East Point, Georgia 30344 and the results indicated a sample with lead concentration in excess of the acceptable groundwater screening levels. A copy of the report is attached.

We have not been digging in the ground or doing any repairs or renovations that requires disturbing the ground. Please contact me at 404-559-8571 or reply by email at [dstanley@bpsparts.com](mailto:dstanley@bpsparts.com) to let me know what if anything we need to do at this time.

Sincerely,  
JM Boles Family Limited Partnership

  
Debra Stanley

**TABLE 2: SUMMARY OF GROUNDWATER ANALYTICAL RESULTS (Detected Constituents Only)**

**HERTZ HES FACILITY**

2251 Sylvan Road, Suite 700

East Point Fulton County, Georgia

ATC Associates Project No. 070.75015.1106

| Sample Location | Date Sampled | Constituent | Detected Concentration (mg/L) | Media Target Concentrations (mg/l) |
|-----------------|--------------|-------------|-------------------------------|------------------------------------|
| SB-9            | 9/8/11       | Barium      | 0.0650                        | 2.0                                |
|                 |              | Chromium    | 0.0299                        | 0.1                                |
| SB-10           | 9/8/11       | Barium      | 0.588                         | 2.0                                |
|                 |              | Chromium    | 0.0351                        | 0.1                                |
|                 |              | Lead        | 0.159                         | 0.015                              |
| SB-12           | 9/8/11       | Chloroform  | 0.0063                        | 0.08*                              |

**NOTES:**

Soil samples were collected on September 8, 9 and 12, 2011.

mg/l = milligrams per liter or parts per million (ppm)

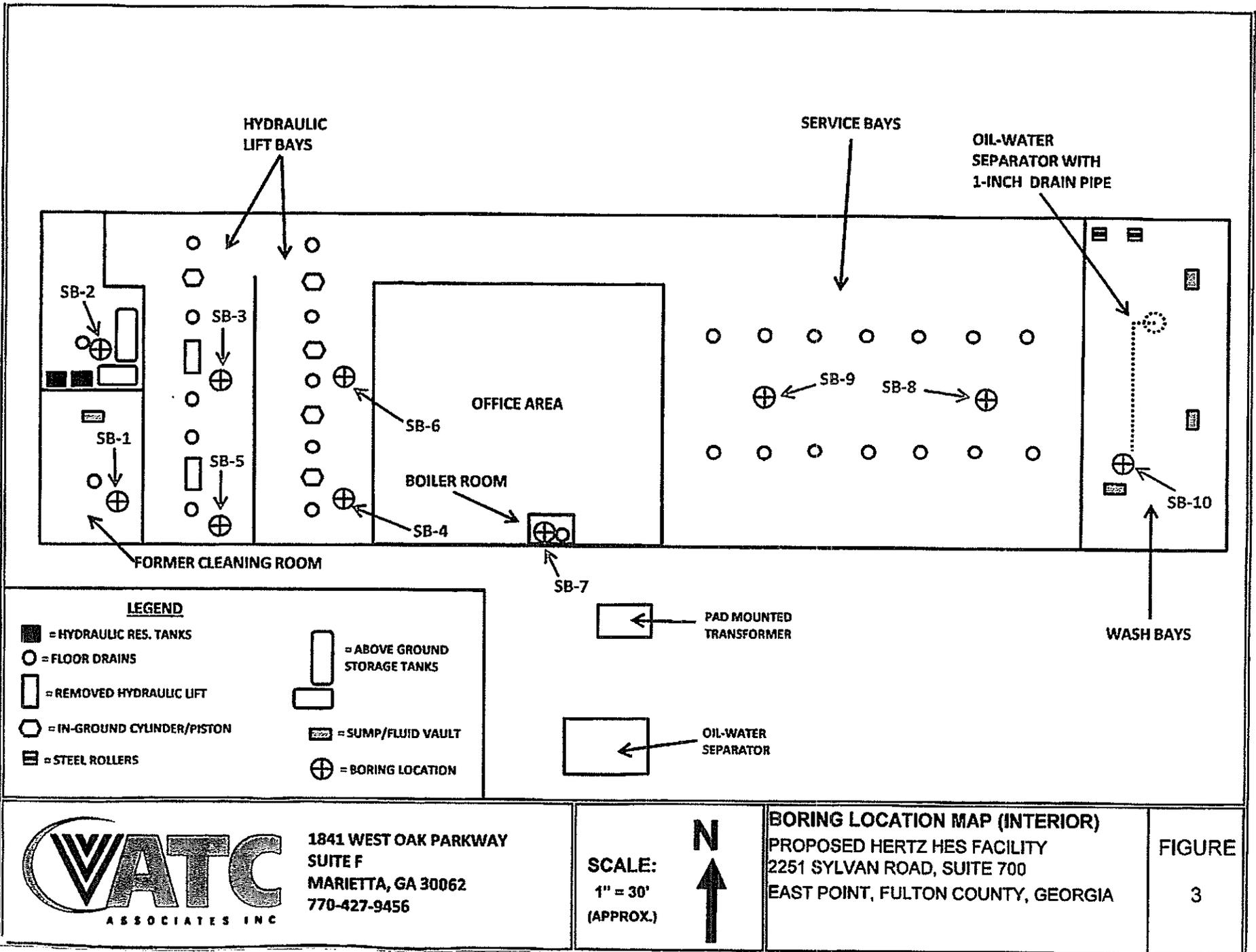
Samples were submitted to Analytical Environmental Services in Atlanta, Georgia

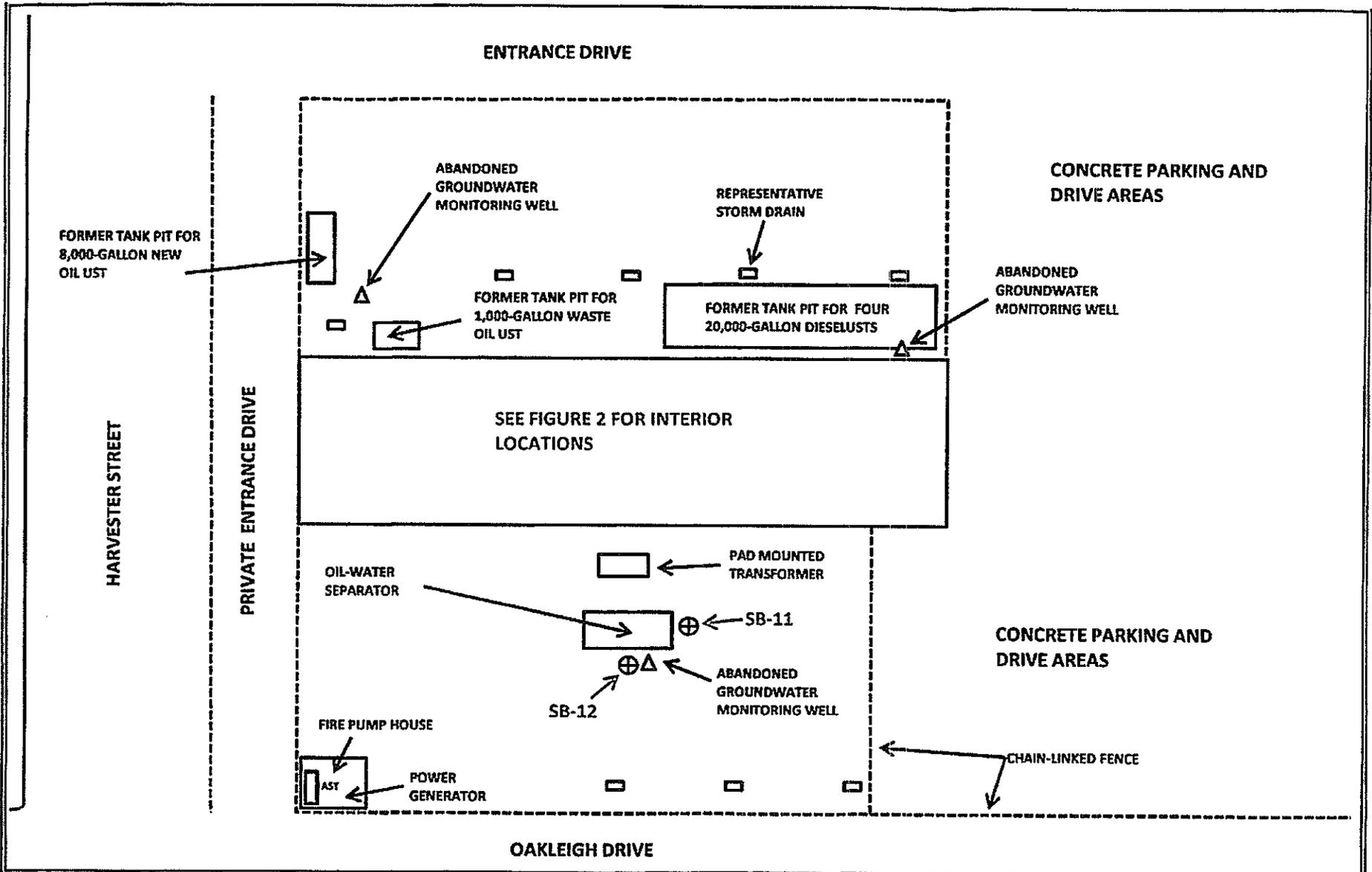
Groundwater Standards are derived from Chapter 391-3-19, GA Rules for Hazardous Site Response

(Appendix III Media Target Concentrations)

\*Chloroform refers to Trihalomethanes in the Rules. Compound is reportable as it is above background conditions.

**0.159** = Groundwater sample exceeds applicable Media Target Concentration and is reportable.





1841 WEST OAK PARKWAY  
 SUITE F  
 MARIETTA, GA 30062  
 770-427-9456

SCALE:  
 1" = 60'  
 (APPROX.)



**BORING LOCATION MAP (EXTERIOR)**  
 PROPOSED HERTZ HES FACILITY  
 2251 SYLVAN ROAD, SUITE 700  
 EAST POINT, FULTON COUNTY, GEORGIA

FIGURE

4

5938

# 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

FEB 15 2012

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)     |   |        |          |           |
| 3  | Tax Map and Parcel ID Number      |   |        | Acreage  | 19.73     |
| 4  | Site or Facility Name             | North Decatur Square Shopping Center                                    |        |          |           |
| 5  | Site Street Address               | 2863-2875 North Decatur Road  |        |          |           |
| 6  | Site City                         | Decatur   | County | DeKalb   | Zip 30303 |
| 7  | Property Owner                    | North Decatur Square Partners, LLC, a Georgia limited liability company |        |          |           |
| 8  | Property Owner Mailing Address    | Perdue Management Company, 1266 West Paces Ferry Road, N.W., #426       |        |          |           |
| 9  | Property Owner City               | Atlanta   | State  | GA       | Zip 30327 |
| 10 | Property Owner Telephone No.      |   |        |          |           |
| 11 | Site Contact Person               | Gerald Pouncey, Jr.   | Title  | Attorney |           |
| 12 | Site Contact Company Name         | Morris, Manning & Martin, LLP   |        |          |           |
| 13 | Site Contact Mailing Address      | 3343 Peachtree Road, NE   |        |          |           |
| 14 | Site Contact City                 | Atlanta   | State  | GA       | Zip 30326 |
| 15 | Site Contact Telephone No.        | 404-233-7000  |        |          |           |
| 16 | Facility Operator Contact Person  |   |        | 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.

David L. Perdue

NAME (Please type or print)

SIGNATURE

DATE

*David L. Perdue* 1/30/12

North Decatur Square Partners, LLC,

a Georgia limited liability company

By: ODS Investors, LLC, its Managing Member

By: David L. Perdue, its Manager

## 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. It is suspected that the release occurred from the on-site drycleaning operations.

**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.):**

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).**

Soil and groundwater sampling has been performed as part of due diligence.

**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 N/A

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

## 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: Jefferson Square Apartments

Address: adjacent to south

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: Clairmont Elementary School Spring (unused)

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://qgsstore.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) |
|-------------------------|---------------------|--|--|
| Tetrachloroethene       | 127-18-4            | 420 ppb  | 18.98                                    |
| Trichloroethene         | 79-01-6             | 29 ppb   | 18.98                                    |
| cis 1, 2 Dichloroethene | 156-59-2            | 47 ppb   | 18.98                                    |
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## Site Summary

The subject property consists of 19.73 acres of land located at 2863-2875 North Decatur Road in Decatur, DeKalb County. The property contains a retail shopping center with a Kroger anchor tenant.

Historically, the property contained a portion of a former Kraft General Foods manufacturing facility which produced salad dressings. The Kraft facility was demolished in 1998 and the current shopping center was constructed between 1999 and 2000.

In August of 2011, a Phase II investigation was performed as part of due diligence activities for a prospective purchaser. Four (4) temporary wells were installed to evaluate potential releases to groundwater from an on-site, active drycleaning facility, World Cleaners. Soil samples were collected from each of the wells at a location above the water table. In addition, soil samples were collected beneath the floor slab at two locations adjacent to the drycleaning machine. The soil and groundwater samples were analyzed for volatile organic compounds (VOCs).

Drycleaning constituents were detected in the soil beneath the concrete slab of the drycleaning tenant space and in one boring installed behind the drycleaning tenant space. Drycleaning constituents were also detected in the groundwater.

In late August 2011, additional sampling was performed on-site on behalf of the prospective purchaser. Three (3) additional temporary monitoring wells were installed and five (5) multi-depth additional soil borings were installed beneath the concrete slab of the drycleaning tenant space. The additional groundwater samples did not contain VOCs. The additional soil borings collected beneath the drycleaning tenant space did contain VOCs.

The maximum groundwater concentrations contained 420 parts per billion (ppb) tetrachloroethene (PCE), 42 ppb trichloroethene (TCE), and 29 ppb cis 1,2 dichloroethene (cis 1, 2 DCE). None of the detected drycleaning constituents exceeded notification concentrations under the Georgia Rules for Hazardous Site Response.

Based upon a water well survey performed by EarthCon Consultants, Inc., there are no active drinking water wells within a one mile radius of the property. Based upon a lack of drinking water wells within a one mile radius, we respectfully submit that the property does not warrant listing on the Hazardous Site Inventory.

**RECEIVED**  
Georgia EPD

FEB 17 2012

February 15, 2012

**Response and Remediation Program**



Mr. David Brownlee  
Acting HSRA Program Manager  
Georgia Environmental Protection Division  
Hazardous Sites Response Program  
2 Martin Luther King, Jr. Drive, SE, Suite 1154  
Atlanta, GA 30334

**Subject: Supplemental HSRA Release Notification**  
**Georgia Power – Plant Riverside, Intersection/Corner of Martin Luther King Jr.**  
**Boulevard and River Street, Savannah, Chatham County, Georgia**

Dear Mr. Brownlee:

Per our telephone conversation on November 17, 2011 and our meeting on January 19, 2012, Georgia Power has conducted environmental assessments and cleanups at the former Plant Riverside property located in Savannah, Georgia beginning in 2005 and most recently, late in 2011 and early 2012. Due to results obtained from the 2006 environmental assessment, Georgia Power submitted a HSRA Release Notification to EPD on March 30, 2007. EPD's review of the notification data concluded that the former Plant Riverside property did not rank for placement onto the Hazardous Site Inventory ("HSI") (note: EPD's letter was dated January 14, 2007 but the actual date was 2008).

Since the 2007 Release Notification, and as part of utility upgrades and plant decommissioning activities, Georgia Power has completed PCB remediation from the electrical substations and station service transformer areas. Most recently in 2010, several former plant structures, both surface and subsurface, were decommissioned and/or demolished. Due to the soil disturbance caused during this work and new areas previously covered by structures that were inaccessible for evaluation by previous environmental assessments, Georgia Power completed an additional, environmental assessment of the property in the last quarter of 2011.

This recent assessment identified one additional constituent in soil above a HSRA Notification Concentration (NC) (indeno(1,2,3-cd)pyrene) and one additional constituent in groundwater (vinyl chloride) above a HSRA NC that was not previously detected. No PCBs were found at concentrations above the HSRA NC (1.55 mg/kg) or above TSCA's clean-up standard of 1 mg/kg for un-restricted access areas.

As a result of the 2011 assessment findings, Georgia Power is submitting this Supplemental Release Notification. For EPD's reference, the Part III-Soil Release Information table and the Part IV-Groundwater Release Information table (attached) provide both the 2007 and the 2011 notification values for each constituent. Attachment D to the Supplemental Release Notification includes 2011 investigation figures, data summary tables and laboratory reports. As communicated in the Supplemental Release Notification, all other site conditions remain the same as presented in the 2007 Release Notification: the site is fenced; has stable groundcover

(primarily gravel or pavement); and is under 24-hour security surveillance. Therefore, Georgia Power believes the RQSM score will remain the same, and the site will not rank on the HSI.

As discussed with you in our January 2012 meeting, due to the findings from our recent 2011 investigation and as predicated by the need to complete the retirement of Plant Riverside, Georgia Power plans to proceed with an environmental cleanup of the property this year. As we discussed, the cleanup goals will be to remediate soil to levels below EPD's HSRA residential risk reduction standards (RRS) and Appendix I concentrations that trigger notification. Following remedial activities, Georgia Power will submit a revised HSRA Release Notification documenting the completed remediation. We anticipate the revised HSRA Release Notification will be submitted to EPD sometime late fall 2012.

Please contact me at 404-506-7719 with any questions or comments that you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Brett Mitchell III". The signature is written in a cursive, somewhat stylized font.

Robert W. Mitchell III (Brett)  
Environmental Affairs Supervisor

Enclosures: Supplemental HSRA Release Notification, Georgia Power Plant Riverside

## 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:**

The sources of the releases are unknown. The petroleum-related constituents detected in soil may be associated with historical releases of petroleum products from historic oil storage in USTs, ASTs, and/or oil-skimmers that were formerly utilized on the property (see Figures 4 and 5, Attachment B; Table 2, Attachment D). The source of inorganic detections in soil and groundwater are unknown, other than possibly vanadium. Vanadium is suspected from the burning of Venezuelan oil for power generation at one time. The SVOC/VOC/metal groundwater detections are primarily from wells located on the up-gradient side (with respect to groundwater flow) of the property (see Figure 5, Attachment B; Table 1, Attachment D). The source(s) of the groundwater detections are also 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.):**

The date(s) and sources of the release(s) is (are) unknown. The physical state of the release(s) is (are) unknown.

**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).**

Southern Company performed an initial evaluation of the property in 2004 and 2005. The sampling was based on historic site features that may have had the potential for the release of regulated compounds. Three wells were installed and sampled as part of this initial site investigation. Some areas of shallow soil were identified to contain regulated compounds above HSRA NC's. Soil with impacts above NC's was removed within 30-days of discovery. Therefore, a HSRA release notification was not submitted at that time. Because of the initial site investigation, Georgia Power conducted a second investigation phase of the property in 2006. The 2006 supplemental site investigation included sampling soil from over 100 soil boring locations (see Figure 6, Attachment B). The results from the 2006 investigation resulted in the original HSRA Release Notification submittal dated March 30, 2007. Upon review of the original HSRA Release Notification the EPD did not list the property on the Hazardous Site Inventory.

In October and November of 2011, Georgia Power re-assessed the property following remediation and consolidation of three substations on the property and partial demolition of the former plant. The results of the 2011 soil and groundwater assessment has required the submittal of this supplemental release notification. The purpose and scope of the 2011 assessment is detailed in the attached Site Summary; Attachment A. The 2011 investigation soil and groundwater data summary tables are in Attachment D, as are laboratory data reports. The 2011 sample location maps are in Attachment B, Figures 5 and 5.

**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 property is fully fenced. Entrances are gated and locked when not operating. The facility has a 24-hour guard on site. Security is supplemented with surveillance cameras.

**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 — Approximately 98% of the site that does not contain buildings has 4-6 inches of gravel cover or asphalt. See Figure 2, Attachment B.  
 Other

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

Approximately 60% of the property is covered with paved surfaces and structures. Approximately 98% of the site that does not contain buildings has 4-6 inches of gravel cover or asphalt, and the remaining area is grassed. See Figure 2, Attachment B.

Revised 5/4/00



**RELEASE NOTIFICATION FORM**  
 HAZARDOUS SITES RESPONSE PROGRAM  
 GEORGIA ENVIRONMENTAL PROTECTION DIVISION  
 (Please type or print legibly)

**RECEIVED**  
 Georgia EPD

FEB 17 2012

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

**Response and Remediation Program**

**PART I -- PROPERTY INFORMATION**

5940

|    |                                   |   |        |                                  |     |       |
|----|-----------------------------------|---|--------|----------------------------------|-----|-------|
| 2  | EPA ID NUMBER (if applicable)     |   |        |                                  |     |       |
| 3  | Tax Map and Parcel ID Number:     | Tax Parcels 2-003-01-001 and 2-003-02-001, District, Savannah, Chatham County, Georgia  |        |                                  |     |       |
| 4  | Site or Facility Name             | Georgia Power - Plant Riverside   |        |                                  |     |       |
| 5  | Site Street Address               | Intersection/Corner of Martin Luther King Jr. Boulevard and River Street, located directly on the bank of the Savannah River (Figures 1, 2 and 3; Attachment B) |        |                                  |     |       |
| 6  | Site City                         | Savannah  | County | Chatham                          | Zip | 31402 |
| 7  | Property Owner                    | Georgia Power   |        |                                  |     |       |
| 8  | Property Owner Mailing Address    | 241 Ralph McGill Boulevard, 22 <sup>nd</sup> Floor, Bin 10221   |        |                                  |     |       |
| 9  | Property Owner City               | Atlanta   | State  | Georgia                          | Zip | 30308 |
| 10 | Property Owner Telephone No.      | 404-506-7719  |        |                                  |     |       |
| 11 | Site Contact Person               | Robert W. Mitchell  | Title  | Environmental Affairs Supervisor |     |       |
| 12 | Company Name                      | Georgia Power   |        |                                  |     |       |
| 13 | Site Contact Mailing Address      | 241 Ralph McGill Boulevard, 22 <sup>nd</sup> Floor, Bin 10221   |        |                                  |     |       |
| 14 | Site Contact City                 | Atlanta   | State  | Georgia                          | Zip | 30308 |
| 15 | Site Contact Telephone No.        | 404-506-7719  |        |                                  |     |       |
| 16 | Facility Operator                 | Same as owner   | Title  |                                  |     |       |
| 17 | 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.

Tanya Barlow  
 NAME (Please type or print) General Manager Environmental Affairs  
 Tanya Barlow  
 SIGNATURE 2/13/12  
 DATE

## 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:** Multiple dwelling housing complex, located to the southwest of the Riverside Plant property (Figure 3, Attachment B)

**Address:** Intersection of West Bay Street and Ann Street, Savannah, Georgia 30318 (Figure 3, Attachment B)

Note: GP suspects that there may be 2<sup>nd</sup> floor apartments above the ground floor businesses that are located across River Street from the property.

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

- 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 supply wells or intakes exist within 3 miles downgradient of the site. Derrene Plaza Condo Well #1, Georgia Water System ID No. 510092 is within 1-2 miles upgradient with respect to groundwater flow from the site; see Attachment C, Water Supply Survey).

**Address:** Derenne Plaza Owners Association, 24 East Liberty Street, Savannah, Georgia, 31401

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. – (Attachment A)

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.

– (Figures 4, 5 and 6, Attachment B)

#### 10. U.S.G.S. Topographic Map – (Figure 1, Attachment B)

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.

Revision 5/4/00

**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 (see Attachment D) for all samples analyzed from the site. Use additional sheets if necessary.

| Regulated Substance                   | CAS Number | 2007 Notification                     |  | 2011 Notification                            |  |
|---------------------------------------|------------|---------------------------------------|--|--|--|
|                                       |            | Highest Detected Concentration (µg/L) | Sample Depth Below Ground Surface (Feet) | Highest Detected Concentration (µg/L)        | Sample Depth Below Ground Surface (Feet) |
| Vinyl Chloride                        | 75014      | ND                                    | -  | 1.2  | 1.5-11.5                                 |
| Beryllium <sup>1</sup>                | 7440417    | 0.023                                 | 5-13                                     | ND   | *  |
| <b>Petroleum Related Constituents</b> |            |                                       |  |  |  |
| Acenaphthene                          | 83329      | 18                                    | 4-15                                     | ND   | -  |
| Benzene                               | 71432      | 2                                     | 3.5 - 12                                 | 5.3  | 2-12                                     |
| Ethylbenzene                          | 100414     | 630                                   | 3.5 - 12                                 | 640  | 2-12                                     |
| Isopropylbenzene                      | 98828      | 63                                    | 3.5 - 12                                 | 70   | 2-12                                     |
| Naphthalene                           | 91203      | 250                                   | 3.5 - 12                                 | ND   | *  |
| Phenanthrene                          | 85018      | 16                                    | 4-15                                     | ND   | *  |
| Toluene                               | 108883     | 63                                    | 3.5 - 12                                 | 47   | 2-12                                     |
| Total Xylenes                         | 1330207    | 260                                   | 3.5 - 12                                 | 260  | 2-12                                     |
| m+p-Xylene                            | 108383     | 250                                   | 3.5 - 12                                 | concentrations reflected under total xylenes |  |
| o-Xylene                              | 95476      | 14                                    | 3.5 - 12                                 |  |  |

Notes:

1, Background levels for metals have not been established. In 2006 low concentrations of arsenic, barium, vanadium and zinc were detected above laboratory reporting limits. Beryllium was the only inorganic constituent present at a concentration exceeding the HSRA Type 1/3 RRS, and was detected in one upgradient well on site. In 2011 groundwater was analyzed for arsenic, barium, beryllium, cadmium, lead, selenium, silver, vanadium, zinc and mercury. Only barium and vanadium were detected above laboratory reporting limits; however, neither metal was detected above the HSRA Type 1/3 RRS.

ND, not detected above a PQL

NA, constituent not analyzed

\*, not applicable

### 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 (see Attachment D) for all samples analyzed from the site. Use additional sheets if necessary.

| Regulated Substance                   | CAS Number | HSRA NC | 2007 Notification Highest Concentration (mg/kg) Detected Between 0-6 Inches | 2011 Notification Highest Concentration (mg/kg) Detected Between 0-6 Inches | 2007 Notification Highest Concentration (mg/kg) Detected Between 6-24 Inches | 2011 Notification Highest Concentration (mg/kg) Detected Between 6-24 Inches | 2007 Notification Highest Concentration (mg/kg) Detected Greater Than 24 Inches | 2011 Notification Highest Concentration (mg/kg) Detected Greater Than 24 Inches |
|---------------------------------------|------------|---------|---|---|--|--|---|---|
| Carbon Disulfide                      | 75150      | DL      | 0.015   | ND  | 0.022  | ND   | 0.055   | NA  |
| Tetrachloroethene                     | 127184     | 0.18    | 0.0036  | 0.0075  | 0.21   | ND   | ND  | NA  |
| Barium                                | 7440393    | 500/BG  | 218   | 420   | 876  | 320  | 639   | 230   |
| Beryllium                             | 7440417    | 3/BG    | 0.6   | 0.89  | 34   | 1.2  | 51  | 0.56  |
| Copper                                | 7440508    | 1500    | 217   | NA  | 2,010  | NA   | 260   | NA  |
| Lead                                  | 7439921    | 400     | 1,040   | 2,200   | 1,530  | 3,100  | 1,020   | 980   |
| Vanadium                              | -99000     | 100/BG  | 188   | 2300  | 943  | 1100   | 280   | 93  |
| PCBs (Aroclor 1242)                   | 53469219   | 1.55    | 209   | ND  | ND   | ND   | No Data   | ND  |
| PCBs (Aroclor 1254)                   | 11097691   | 1.55    | 3.02  | 0.74  | 1.67   | 0.52   | No Data   | ND  |
| PCBs (Aroclor 1260)                   | 11096825   | 1.55    | 24.9  | 0.49  | ND   | 0.54   | No Data   | ND  |
| PCBs (Aroclor 1268)                   | 136363     | 1.55    | 1.6   | ND  | ND   | ND   | No Data   | ND  |
| <b>Petroleum Related Constituents</b> |            |         |   |   |  |  |   |   |
| Benzo(a)anthracene                    | 56553      | 5       | 6.9   | 10  | 5.6  | 9.7  | 1.9   | 2.7   |
| Benzo(a)pyrene                        | 50328      | 1.64    | 5.3   | 16  | 4.8  | 54   | 0.89  | 2   |
| Benzo(b)fluoranthene                  | 205992     | 5       | 4.4   | 7.8   | 5.4  | 6.9  | 0.88  | 1.5   |
| Indeno(1,2,3-cd)pyrene                | 193395     | 5       | <NC   | 5.8   | <NC  | 5.2  | <NC   | 1   |
| Chrysene                              | 218019     | 5       | 7.1   | 10  | 5.6  | 8.8  | 1.9   | 2.7   |

ND - not detected above a Laboratory PQL

NA - constituent not analyzed

<NC - constituent not detected in any samples above a HSRA Notification Concentration in 2006; therefore, not reported in the 2007 Notification  
PCBs were remediated in the substations that were decommissioned following the 2007 HSRA Notification.

**ATTACHMENT A**

**Site Summary**

## Site Summary

Georgia Power Plant Riverside (Plant), formerly owned and operated by Savannah Electric, was retired in June 2005. The Plant was built in 1912. Various retrofits and expansions occurred during the Plant's history. The Plant has used coal, oil, and natural gas as fuel for power generation. The facility covers approximately 5.5-acres and is located immediately adjacent to the Savannah River (Figure 1, Attachment B). Those areas of the property that are not covered with structures are primarily covered with gravel (Figure 2, Attachment B). The Property is bordered on the northwest by a Georgia Port Authority wharf/warehouse; to the northeast by the Savannah River; to the southeast by a parking area owned by the City of Savannah for River Street businesses; and to the southwest by River Street and various businesses across River Street.

Southern Company Services (SCS) performed a site investigation in 2004/2005 and sampled soil from 29 borings and sampled groundwater from three monitoring wells (MW-1, MW-2, and MW-3). Upon receipt of analytical data, SCS compared the analytical results to HSRA Notification Concentrations (NC's). Within 30 days of receipt of the analytical data, SCS removed those soils containing HSRA regulated constituents at concentrations above NC's. After merger of Savannah Electric and Georgia Power, Georgia Power moved forward with a more comprehensive site investigation in 2006.

The 2006 comprehensive site investigation included soil and groundwater sampling from 33 soil borings and 11 monitoring wells (Figure 6, Attachment B). Additionally, soil sampling for polychlorinated biphenyl's (PCBs) was performed at over fifty locations, targeting those areas on the Plant site that both historically or currently contained electrical equipment that may have utilized dielectric fluids (e.g. capacitors, transformers). As result of the investigation, some soil was identified on the property to contain regulated compounds at concentrations above HSRA NC's. Groundwater results indicated 2 of 15 monitoring wells contained groundwater with regulated compounds above NC's. Both monitoring wells were located upgradient on the property with respect to topography and groundwater flow. On March 30, 2007, Georgia Power submitted a HSRA Release Notification based upon this data. In a letter dated January 14, 2007 (2008), the EPD notified Georgia Power that a release exceeding a reportable quantity had not occurred on the site; consequently, the site did not rank for placement on the Hazardous Site Inventory.

In 2007, in support of utility and electrical infrastructure upgrades, limited PCB remediation was completed in Substation A and at three former station-service transformer areas. In 2010, Substation A and the East Substation were decommissioned. After removal of the electrical equipment, all soil impacted with PCBs above 1.0 mg/kg was excavated and properly disposed off site. Also in 2010, several surface/subsurface structures on the property were demolished and new underground electrical lines and manholes were installed. Due to the soil disturbance caused during this work, Georgia Power conducted a second comprehensive investigation in 2011. This investigation revisited each of the 2006 boring locations that had soil concentrations greater than HSRA residential RRS, and collected additional samples based upon a grid sampling strategy at areas that were previously inaccessible prior to the 2010 demolition work or may have been disturbed during the 2010 demolition activities (See Figure 4, Attachment B). Ten (10) of the 15, 2006 monitoring well locations were resampled, including those that had concentrations above NC's (See Figure 5, Attachment B).

As a result of this recent investigation, one additional constituent was detected in soil (indeno(1,2,3-cd)pyrene) and one additional constituent was detected in groundwater (vinyl chloride) above a HSRA NC that was not previously detected or reported in the 2007 HSRA Notification. Other than these two findings, all other constituents identified during the 2011 investigation were either at or below the concentrations previously observed and reported in the 2007 HSRA Notification previously evaluated by EPD. Due to several cleanups performed by Georgia Power, no PCBs were found above HSRA NC's. All other site conditions remain the same as presented in the 2007 HSRA notification. The site is secured by a fence and has 24-hour security surveillance, has stable groundcover (primarily gravel or pavement), no groundwater withdrawal points are downgradient of the property and no surface water withdrawal points are within 3 miles of the site. However, Derrene Plaza Condo Well #1, Georgia Water System ID No. 510092 is within 1-2 miles upgradient with respect to groundwater flow from the site; see Attachment C, Water Supply Survey.

The Part III-Soil Release Information table and the Part IV-Groundwater Release information table show both the 2007 notification values and the current notification values for each constituent. Attachment B includes 2011 investigation figures. Attachment D contains 2011 investigation data summary tables and laboratory reports.

5943

# 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

FEB 24 2012

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)     |                                 |         |          |           |
| 3  | Tax Map and Parcel ID Number:     | 14-0131-0009-001-2              | Acreage | 0.3437   |           |
| 4  | Site or Facility Name             | East Point Auto Body Facility   |         |          |           |
| 5  | Site Street Address               | 1466 Central Avenue             |         |          |           |
| 6  | Site City                         | East Point                      | County  | Fulton   | Zip 30344 |
| 7  | Property Owner                    | State Bank and Trust Company    |         |          |           |
| 8  | Property Owner Mailing Address    | 3399 Peachtree Road, Suite 2050 |         |          |           |
| 9  | Property Owner City               | Atlanta                         | State   | GA       | Zip 30326 |
| 10 | Property Owner Telephone No.      | (404) 266-4634                  |         |          |           |
| 11 | Site Contact Person               | William J. Sheppard             | Title   | Attorney |           |
| 12 | Site Contact Company Name         | James Bates, LLP                |         |          |           |
| 13 | Site Contact Mailing Address      | 3399 Peachtree Road, Suite 1700 |         |          |           |
| 14 | Site Contact City                 | Atlanta                         | State   | GA       | Zip 30326 |
| 15 | Site Contact Telephone No.        | (404) 997-6020                  |         |          |           |
| 16 | Facility Operator Contact Person  | See Site Contact                | 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.

Will Cromie  
 NAME (Please type or print)

Assistant Vice President

SIGNATURE

February 17, 2012

DATE

Revised May 2008

## 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:

1-1 dichloroethene is believed to have originated off-site. Freon 113 may have originated off-site or from on-site releases during automobile repair operations.

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.):

Dates of releases and the quantity of material released are 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).

On-site sampling occurred in October 2011, the scope of which is discussed in the attached site summary. No remediation activities have occurred.

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

N/A

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

## 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: Georgia REO Holding, LLC f/k/a Nadlan Central Avenue Apartments

Address: 1452 Central Avenue, East Point, GA 30344

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://qgsstore.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 Registry Number | Highest Concentration Detected Between 0-6 Inches (Specify Units) | Highest Concentration Detected Between 6-24 Inches (Specify Units) | Highest Concentration Detected Greater Than 24 Inches (Specify Units) |
|---------------------|---------------------|---|--|---|
| None                |                     |   |  |   |
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**East Point Auto Body Facility**  
**HSRA Initial Release Notification - Site Summary**

The subject property (the "Site") contains 0.3437 acres. It is located at 1466 Central Avenue, East Point, Fulton County, Georgia. The Site is located in the southeast quadrant of the intersection of Central Avenue and Cherry Street. The Site is developed with a steel-framed, metal building containing approximately 7,000 square feet, constructed on a concrete slab. The Site also contains a shed constructed of concrete block and paved parking areas. Most recently, the Site was used as an automobile body repair shop. That use has been discontinued. State Bank and Trust Company ("State Bank") is the current owner of the Site following foreclosure of a security interest held to secure a loan to the prior owner, Elizabeth Collazo. See Figures 1 and 2; tax parcel map, and aerial photograph attached.

The site is in an area that contains a mixture of industrial and residential uses. Surrounding properties include a chemical manufacturer, a recycling center, a vacant apartment complex, residences, and general commercial businesses.

On October 10, 2011, United Consulting ("United") completed a Phase II investigation of the Site at the request of State Bank. United's investigation included the drilling of four (4) borings using a truck-mounted Geoprobe® direct push drilling machine. United collected both soil and groundwater samples from all four borings. The soil samples were field-screened and no elevated levels of organic vapors were indicated. As a result, no soil samples were tested in the laboratory. The groundwater samples were submitted for analytical testing for VOCs, SVOCs, and RCRA metals using EPA test methods 8260B, 8270D, 3050S, and 7417B. Due to high turbidity, both "total" and "dissolved" analyses were performed on the RCRA metals samples.

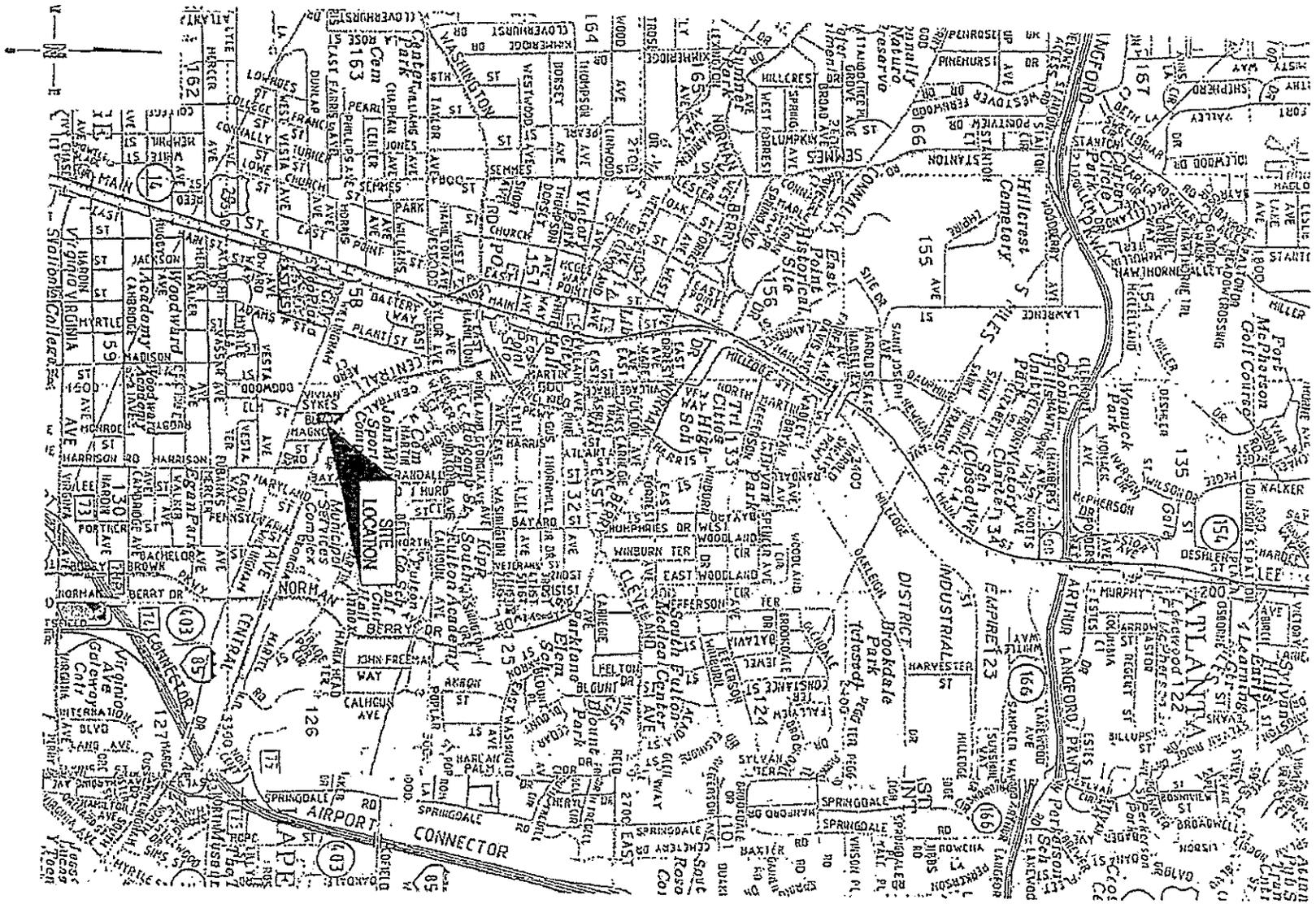
Low concentrations of various metals (including barium, chromium, and lead) were detected in the non-filtered groundwater samples in all four borings. The filtered samples showed only low levels of barium, which is believed to be indicative of naturally occurring, background concentrations. The presence of chromium and lead are believed to be the result of high turbidity in the samples and not indicative of a release to groundwater.

United reported the presence of two substances in the groundwater samples above the HSRA Notification Limits. Those substances and their detected concentrations are (a) 1-1 dichloroethene (7.2 µg/£); and (b) Freon 113 (42 µg/£). Based on the location of the boring in which 1-1 dichloroethene (1-1DCE) was discovered (DP-2 – up-gradient from the structure on the Site and down-gradient from off-site manufacturing activities), that contaminant is believed to be the result of an off-site release. The presence of Freon 113 in the groundwater may be the result either an off-site or an on-site release.

Following its on-site investigation, United performed a survey for potential drinking water receptors within three (3) miles from the Site. No in-use water supply wells were discovered as a result of that survey.

United has performed a draft RQSM calculation for the Site for both the off-site exposure pathway (i.e., groundwater) and the on-site exposure pathway (i.e., soil) based on the confirmed presence of 1-1DCE and Freon 113 in the groundwater and the suspected presence of Freon 113 in soil. The results of those calculations show that the Site does not have a release of a "Reportable Quantity" of any identified hazardous substance and should receive a non-HSI listing. State Bank requests that EPD issue a "no-listing" letter for the Site. In any event, State Bank is not a "person who has contributed or who is contributing to a release" of hazardous substances as defined in HSRA.

No corrective action has been taken in response to this release and no imminent health threat is apparent.



|                                 |                 |                          |  |
|---------------------------------|-----------------|--------------------------|--|
| SCALE: 1" = 2,000'              | DATE: 21-Oct-11 | PROJECT NO: 2011.2600.02 | TITLE: SITE LOCATION MAP   |
| PREPARED: IGP                   | CHECKED:        | REVISIONS:               | EAST POINT AUTO BODY   |
| CLIENT:<br>STATE BANK AND TRUST |                 |                          | UNITED CONSULTING<br>625 Holcomb Bridge Road, Norcross, GA  |

FIG. 1

5942

# 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

FEB 24 2012

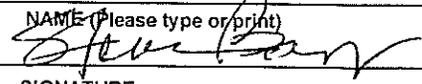
1. The information provided in this form is for:  
 Initial Release Notification  
 Supplemental Notification

## PART I -- PROPERTY INFORMATION Response and Remediation Program

(Please type or print legibly)

|    |                                   |   |         |               |           |
|----|-----------------------------------|---|---------|---------------|-----------|
| 2  | EPA ID NUMBER (if applicable)     |   |         |               |           |
| 3  | Tax Map and Parcel ID Number:     | 6150-117                                      | Acreage | 1.15          |           |
| 4  | Site or Facility Name             | Former Indian Restaurant                      |         |               |           |
| 5  | Site Street Address               | 4095 Lawrenceville Highway                    |         |               |           |
| 6  | Site City                         | Lilburn                                       | County  | Gwinnett      | Zip       |
| 7  | Property Owner                    | Wells Fargo Bank, NA, through Foreclosure     |         |               |           |
| 8  | Property Owner Mailing Address    | 420 N 20th Street 7 <sup>th</sup> Floor       |         |               |           |
| 9  | Property Owner City               | Birmingham                                    | State   | AL            | Zip 35203 |
| 10 | Property Owner Telephone No.      | 205.254.5951                                  |         |               |           |
| 11 | Site Contact Person               | Steve Barr                                    | Title   | Asset Manager |           |
| 12 | Site Contact Company Name         | Wells Fargo Bank, N.A.                        |         |               |           |
| 13 | Site Contact Mailing Address      | 420 N 20th Street 7 <sup>th</sup> Floor       |         |               |           |
| 14 | Site Contact City                 | Birmingham                                    | State   | AL            | Zip 35203 |
| 15 | Site Contact Telephone No.        | 205.254.5951                                  |         |               |           |
| 16 | Facility Operator Contact Person  | N/A   | Title   |               |           |
| 17 | Facility Operator Company Name    | Facility is in-operable and vacant at present |         |               |           |
| 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.

Steven Barr Asst. Vice President  
 NAME (Please type or print) TITLE  
 2/21/12  
 SIGNATURE 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:**

It is believed that the release occurred from draining material or natural conditions on the property and not due to a release of the chemical onto or from the surface.

**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 are un-known.

**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).**

During a Phase II assessment on the property three (3) temporary monitoring wells were installed and the soils and groundwater were sampled. The samples were analyzed and the results indicated trace amounts of Chloroform in groundwater.

**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.**

NOT APPLICABLE - No soil release noted.

## 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: Berkmar High School

Address: 405 Pleasant Hill Road - Lilburn, Georgia 30047

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 - No wells were noted within 3-miles of subject property.

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.

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### 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 Registry Number | Highest Concentration Detected Between 0-6 Inches<br>(Specify Units) | Highest Concentration Detected Between 6-24 Inches<br>(Specify Units) | Highest Concentration Detected Greater Than 24 Inches<br>(Specify Units) |
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## 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 Registry Number | Highest Detected Concentration (Specify Units) | Sample Depth Below Ground Surface (Feet) |
|---------------------|---------------------|--|--|
| Chloroform          | 67-66-3             | 21.0 ug/l (.021 mg/l)                          | Approx. 10 feet                          |
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**RECEIVED**  
Georgia EPD

FEB 24 2012

February 22, 2012

**Response and Remediation Program**

Georgia Environmental Protection Division  
Hazardous Site Response Program  
Suite 1462, Floyd Tower East  
2 Martin Luther King Jr. Drive, SE  
Atlanta, Georgia 30334-9000

Re: Release Notification / Reporting Form  
4095 Lawrenceville Highway, Lilburn, GA

Dear Madam or Sir:

This letter has been prepared to accompany the submittal of the attached Release Notification / Reporting Form. Garrard Development currently has the subject property under contract and encountered chloroform in the groundwater during Phase II Environmental Testing and Analysis performed by RKS Green Consulting Group, LLC during the due diligence evaluation of the property.

The current property owner, Wells Fargo Bank, was notified of the findings of the Phase II testing and they, based on our data and recommendation have prepared the accompanying form.

Should any question arise please contact Garrard Development, RKS Green Consulting Group, LLC or Wells Fargo.

Respectfully Submitted,

Garrard Development Services, LLC

A handwritten signature in black ink, appearing to read 'D. Scott Lindstrom'. The signature is written in a cursive style with a long horizontal line extending to the right.

D. Scott Lindstrom

*Wells Fargo Bank, N.A.  
Steven Barr  
Asset Manager, OREO  
Mail Code: W0125-070  
420 North 20th Street - 7th Floor  
Birmingham, AL 35203  
[Steven.Barr@wellsfargo.com](mailto:Steven.Barr@wellsfargo.com)*

**RECEIVED**  
Georgia EPD

FEB 24 2012

Response and Remediation Program



February 21, 2012

Georgia Environmental Protection Division  
Hazardous Sites Response Program  
Suite 1462, Floyd Tower East  
2 Martin Luther King Jr. Drive, S.E.  
Atlanta, GA 30334-9000

To Whom It May Concern:

The attached Release Notification/Reporting Form has been signed by Mr. Steven Barr as an employee of Wells Fargo Bank, N.A., the owner of the below referenced property through foreclosure. The certification signed by Mr. Barr is limited to the knowledge gained by Wells Fargo Bank through Mr. Barr's receipt of the report on the investigation and the analysis performed on the samples taken for the below referenced property as part of the due diligence of a prospective purchaser. Wells Fargo Bank, N.A. and Mr. Barr have no independent knowledge of the release or other environmental information on or referenced in the attached Release Notification/Reporting Form. The property is currently under contract to be purchased by Garrard Development Services, LLC. In good faith, Wells Fargo Bank has allowed Garrard Development to perform due diligence, including sampling the soil and ground water, which lead to the preparation of the Release Notification/Reporting Form. The information is provided on the Form and any attachments solely by the consultant for Garrard Development Services, LLC, which is RKS Green Consulting Group, LLC. Mr. Christopher Settles, PE, a principal with RKS, prepared the information which is the subject of the certification which is submitted by Wells Fargo bank to assist in the successful closing of the property transaction.

Property Address:  
4095 Lawrenceville Highway  
Lilburn, GA  
Gwinnett County Tax ID No.: 6150-117  
(Former Indian Restaurant)

Very truly yours,

A handwritten signature in black ink that reads "Steven Barr".

Mr. Steven Barr  
Wells Fargo Bank, N.A.