

6025

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

NOV 2 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)	GAD000613240				
3	Tax Map and Parcel ID Number:	112007001	Acreage	22.46		
4	Site or Facility Name	Momentive Speciality Chemicals Inc. (formerly McWhorter Technologies Inc.)				
5	Site Street Address	6906 Dixie Street				
6	Site City	Columbus	County	Muscogee	Zip 31907	
7	Property Owner	Momentive Speciality Chemicals Inc.				
8	Property Owner Mailing Address	180 East Broad Street				
9	Property Owner City	Columbus	State	OH	Zip 43215	
10	Property Owner Telephone No.	(614) 225 3369				
11	Site Contact Person	Charles McGehee	Title	EH&S Coordinator/Caretaker		
12	Site Contact Company Name	Momentive Speciality Chemicals Inc.				
13	Site Contact Mailing Address	6906 Dixie Street				
14	Site Contact City	Columbus	State	GA	Zip 31907	
15	Site Contact Telephone No.	(706) 563-9290				
16	Facility Operator Contact Person	Charles McGehee	Title	EH&S Coordinator/Caretaker		
17	Facility Operator Company Name	McWhorter Technologies Inc.				
18	Facility Operator Mailing Address	6906 Dixie Street				
19	Facility Operator City	Columbus	State	GA	Zip 31907	
20	Facility Operator Telephone No.	(706) 563-9290				

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.

Karen E. Koster
NAME (Please type or print)

Executive Vice President - EHS
TITLE

[Signature]
SIGNATURE

11-1-12
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:

Low-level diffuse impacts associated with REC areas identified in a Phase I ESA (Prater & York, 2009).

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.):

No known releases have been reported associated with the REC areas identified in the Phase I ESA from 2009 except for a styrene release from April 3, 2000 in vicinity of soil and groundwater sample SS-2/GW-2. A letter was sent from Georgia EPD on September 1, 2000 stating that EPD has no reason to believe a release exceeding a reportable quantity has occurred at the site. This site was not listed on the Hazardous Site Inventory.

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 Phase II investigation was performed at the facility on September 17 & 18, 2012. Thirteen boring locations were selected in former chemical process/blending or storage areas of the facility and temporary piezometers were installed at each boring location. Soil samples from 0-2 ft were collected from each boring along with groundwater samples. Type I Target Concentrations (Table 1, Appendix III of Chapter 391-3-19) in groundwater were marginally exceeded at four sampling locations for Ethylbenzene, Isopropylbenzene/Cumene, and Naphthalene. A soil and groundwater sample, SS-2/GW-2, were collected in proximity to the styrene release reported in April 2000. No VOC's or SVOC's were detected above detection limits in the SS-2 soil sample. Only ethylbenzene and isopropylbenzene were found to be marginally above the Type I Residential Target Concentrations for groundwater in sample GW-2. Analytical results from the Phase II investigation suggest that no continuing source area or significant environmental impact exists in the styrene release area.

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 facility is surrounded by a fence. A gate is located by the office which remains locked since the facility is no longer active. The facility is monitored during normal business hours by the site caretaker and EH&S Coordinator - Charles McGehee. Security Personnel monitor the facility after normal business hours.

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

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

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

The majority of the identified REC areas are covered by concrete or asphalt except for surface-water drainage patterns or swales that were considered when choosing boring locations for the Phase II investigation. All AST's & tank farms have secondary containment consisting of concrete floor and cinder block walls. The hazardous waste storage area is covered by a canopy with a concrete floor that has elevated (6-8") sides. The maintenance shop has concrete floors and metal roof. The current and former loading rack areas are paved with asphalt. The former railroad spur has been paved over with asphalt. The former latex loading area is covered with a concrete

slab. The former blend area located in the current warehouse area is also covered by concrete slab.

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: Jesse Richard Benning

Address: 5200 Schatulga Road, Columbus, GA 31907

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: The USGS database was searched and no drinking water wells were identified.

Address: No potable water supply wells exist within 3 miles of the facility. The city water department, planning department, engineering department and the county health department were contacted as well as an area reconnaissance.

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>.

Revised May 2008

Site Summary

Momentive Specialty Chemicals, Inc.
6906 Dixie Street
Columbus, Georgia

Momentive Specialty Chemicals Inc. retained ARCADIS U.S., Inc. (ARCADIS) to conduct a Phase II Environmental Site Assessment (ESA) of soil and groundwater quality at its facility located at 6906 Dixie Street in Columbus, Muscogee County, Georgia (Site). The subject site consists of a single parcel of approximately 22.46 acres with topography that slopes slightly to the south and south-southeast toward Bull Creek, which forms the southern property boundary. The facility functioned as a batch chemical plant that manufactured paint and latex resins primarily for the automotive industry until April 2009 when operations ceased. The Site is located in an area that is developed with industrial and other commercial facilities and the Ft. Benning Military Reservation lies to the east of the Site, across Schatulga Road.

The scope of work for this project was to investigate potential soil and groundwater impacts in the proximity of areas of recognized environmental conditions (RECs) identified in the 2009 Phase I ESA (Prater and York, 2009). The REC locations were primarily areas of the facility used to store drums of chemicals, blend or process areas, tank farms, and areas for loading/offloading of bulk chemicals. Site conditions, such as surface-water drainage patterns, stressed vegetation, drain/piping locations, and surface staining, were evaluated to identify suitable boring locations within each REC.

ARCADIS advanced a total of 13 soil borings to investigate the soil and groundwater quality at the identified REC locations. Soil and groundwater samples were collected from each of the borings and were analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and metals. A subset of samples was also analyzed for ethylene glycol and cyanide. The concentrations detected in both soil and groundwater samples appear to be indicative of low-level diffuse impacts associated with former industrial use and do not suggest the presence of source areas associated with RECs.

The results show that concentrations of regulated compounds detected in soil do not exceed notification concentrations published in Appendix I of Chapter 391-3-19 of the *Rules of Georgia Department of Natural Resources Environmental Protection Division* (Georgia Environmental Rules). VOCs and SVOCs were detected in groundwater at concentrations exceeding detection limits. None of the detected VOC or SVOC constituents, with the exception of ethylbenzene, isopropylbenzene, and naphthalene, were detected at concentrations exceeding the Georgia Media Target Concentrations for groundwater published in Table 1, Appendix III of Chapter 391-3-19 ("Type 1 groundwater criteria"). Type 1 groundwater criteria are concentrations that will pose no significant risk on the basis of standardized assumptions and defined risk level for residential properties.

Concentrations of VOCs, SVOCs, and metals in groundwater samples are not expected to require remedial action based on the anticipated future industrial use of the Site, lack of drinking water receptors (based on a potable well survey performed in October 2012 and the previous release notification that resulted in a non-listing status determination), and relative low-level concentration of impacts that only marginally exceed Media Target Cleanup Concentrations and Standard Exposure Assumptions listed in Table 1 of Appendix III, Chapter 391-3-19 of the Georgia Environmental Rules.

CITY: (KNOXVILLE), DIV(GROUP: (ENV/GIS), DB:LD, (B,AL,TOM), PIC: (J, PM: (D,WILDERMAN), TM: (H,ENGLISH,C,TISDALE)
PROJECT: KE120008.0001.00003 PATH: G:\GIS\Momentive\MapDocs\RELEASE NOTF-1 MOM REL SITE.mxd SAVED: 11/1/2012 9:04:55 AM



PROJECTION: NAD83 State Plane Georgia West Feet
AERIAL SOURCE: ESRI online services (BING - accessed September 2012).

LEGEND

▲ Soil/Groundwater Sample Location

MOMENTIVE SPECIALTY CHEMICALS
COLUMBUS, GEORGIA

RELEASE NOTIFICATION

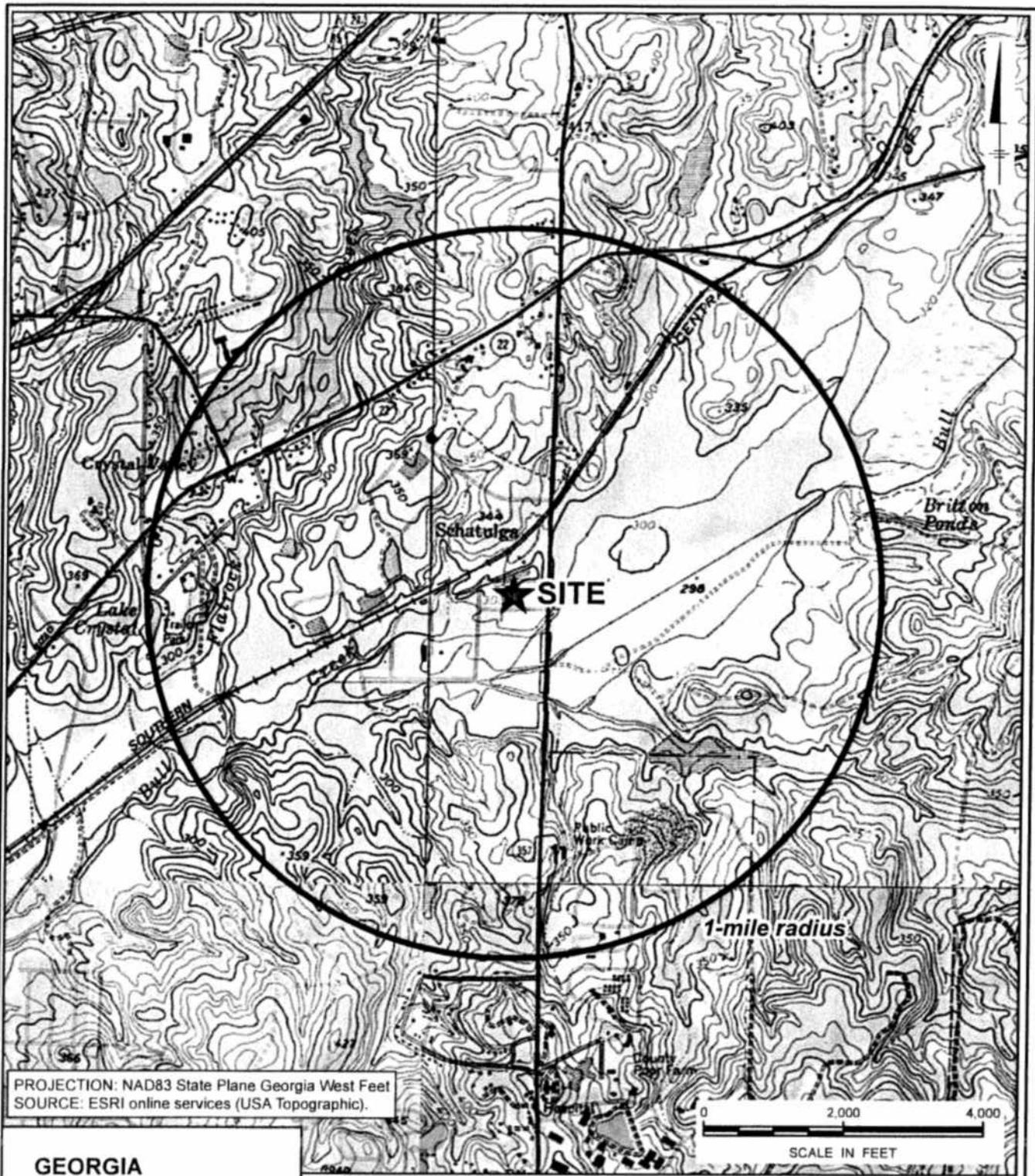
Site Map



FIGURE

1

CITY: (KNOXVILLE); DIV/GRUP: (ENV/GIS); DB/ID: (B.ALTOM); PIC: (D.WILDERMAN); TM: (H.ENGLISH/C.TISDALE);
PROJECT: KE120008.0001.00003; PATH: G:\GIS\Momentive\MapDocs\RELEASE NOTIF2 MOM REL TOPO.mxd; SAVED: 10/21/2012 5:18:27 PM



PROJECTION: NAD83 State Plane Georgia West Feet
SOURCE: ESRI online services (USA Topographic).



REFERENCE:
U.S.G.S. 7.5 Minute Series
Topographic Quadrangles:
Columbus, Georgia 1981/1986,
Fortson, Georgia 1981/1986,
Midland, Georgia 1981/1986,
Ochiltee, Georgia 1981/1986.

CONTOUR INTERVAL: 10 ft.

MOMENTIVE SPECIALITY CHEMICALS
COLUMBUS, GEORGIA
RELEASE NOTIFICATION

U.S.G.S. Topographic Map

 **ARCADIS**

FIGURE
2



Momentive Specialty Chemicals Inc.
180 East Broad Street
Columbus, OH 43215
momentive.com

RECEIVED
Georgia EPD

NOV 2 2012

Response and Remediation Program

November 1, 2012

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

Dear Sir or Madam:

Enclosed please find a Release Notification/ Reporting Form for the property located at 6906 Dixie Street, Columbus, GA 43215. Please note that Momentive Specialty Chemicals Inc. anticipates closing the sale of this property within the next few days. Contact information for the anticipated new owner is as follows:

Global Bio-Chem Pharma, LLC, a Georgia limited liability company
55 Mill Plain Road, Unit 17-2
Danbury, CT 06811
Attn: Sanket Gandhi, CEO
sgandhi@hppeco.com

If you have any questions, please contact me at (614) 225-7427.

Sincerely,

Rick Springer
Vice President – EHS, Forest Products Division

INTRODUCTION TO THE RELEASE NOTIFICATION/REPORTING FORM HAZARDOUS SITES RESPONSE PROGRAM GEORGIA ENVIRONMENTAL PROTECTION DIVISION

Every July 1, since 1994, the Georgia Environmental Protection Division (EPD) publishes the Hazardous Site Inventory (HSI). The HSI is a list of sites where releases of regulated substances have occurred that are deemed to be reportable by the Rules for Hazardous Site Response, Chapter 391-3-19 (Rules). The Rules require persons who have had a release exceeding specified thresholds to complete the attached Release Notification/Reporting Form and send it to EPD. This information is then evaluated by EPD in terms of both the nature of the release and the proximity of human and environmental receptors. If this evaluation demonstrates that a potential threat to human health or the environment exists, the site is listed on the HSI.

NOTE: PRIOR TO COMPLETING THE FORM, YOU SHOULD READ THE ENCLOSED INSTRUCTIONS AND THE RULES VERY CAREFULLY.

PART I of the form, "Property Information", requests information about the property location, owner, operator, and contact person. PART II, "Release Information", requests specific information regarding the site and the surrounding area. PART III, "Soil Release Information", requests information regarding releases of regulated substances to soil. PART IV, "Groundwater Release Information", requests information regarding releases of regulated substances to groundwater.

Are there exclusions to the notification/reporting requirements?

YES. These exclusions are found in Section 391-3-19-.04(2) of the Rules.

Who should complete this form?

Property owners who discover any of the following releases of regulated substances not specifically excluded as described above are required to complete this form, regardless of whether or not they caused the release:

- groundwater contamination above naturally-occurring background concentrations;
- soil contamination above levels specified in Appendix I of the Rules; or
- discarded or abandoned regulated substances in barrels, drums, tanks or other containers.

What are "regulated substances"?

"Regulated substance" means any substance defined in the Hazardous Waste Management Act, O.C.G.A. §12-8-62, by the terms "hazardous waste" or "hazardous constituent", or any substance defined in the Hazardous Site Response Act O.C.G.A. §12-8-92, as "hazardous substance." (All such regulated substances are listed in Appendix I of the Rules).

Where can I get help?

If, after reviewing the enclosed instructions and Rules you still have questions, please contact EPD's Hazardous Sites Response Program at (404) 657-8600.

Where do I mail these forms?

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

6029

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

NOV 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:	14-0077-0004-018-7	Acreage	0.1148	
4	Site or Facility Name	Parking Deck			
5	Site Street Address	40 Pryor Street			
6	Site City	Atlanta	County	Fulton	Zip 30303
7	Property Owner	Panthers on Pryor, LLC			
8	Property Owner Mailing Address	30 Courtland Street, NE, Suite 217			
9	Property Owner City	Atlanta	State		Zip 30303
10	Property Owner Telephone No.	(404) 413-3500			
11	Site Contact Person	Rebecca A. Davis	Title	Attorney	
12	Site Contact Company Name	Seyfarth Shaw LLP			
13	Site Contact Mailing Address	1075 Peachtree Street NE, Suite 2500			
14	Site Contact City	Atlanta	State	GA	Zip 30309
15	Site Contact Telephone No.	(404) 888-1874			
16	Facility Operator Contact Person	Dr. James Weyhenmeyer	Title	President	
17	Facility Operator Company Name	Panthers on Pryor, LLC			
18	Facility Operator Mailing Address	30 Courtland Street NE, Suite 217			
19	Facility Operator City	Atlanta	State	GA	Zip 30303
20	Facility Operator Telephone No.	(404) 413-3500			

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.

Dr. James Weyhenmeyer
NAME (Please type or print)

Chair, GSURF-Manager, Panthers on Pryor, LLC
TITLE

SIGNATURE

10/15/2012
DATE

PART II -- RELEASE INFORMATION

Page 1 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. Thought to be from previously existing, impacted, soil beneath the lower slab of the parking deck.

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).

Two Phase II sampling events were completed in June and July 2012. No source removal or remediation activities have been completed on the property.

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 affected area of the site is a completely enclosed and secured private parking deck with elevator access to the building floors. The parking areas are secured with chain link fencing and automatic gates. Access to the parking decks is available to the buildings tenants (only) via an electronic access 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.

The concrete slab on the lower level of the parking deck is approximately 8-10 inches thick. Impacted soils are beneath the concrete slab.

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: Georgia State University College of Education

Address: 40 Pryor Street, 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 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: Unknown

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

Yes No

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

REQUIRED ATTACHMENTS

9. SITE SUMMARY

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

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

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

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

Site Summary
40 Pryor Street
Atlanta, Georgia 30303

The property is addressed as 40 Pryor Street, Atlanta, Fulton County, Georgia 30303, and is currently developed with a 20,000 square foot, four story office building that is located at the northeast corner of the intersection of Pryor Street and Wall Street with 44 feet of frontage on Pryor Street and 100 feet of frontage on Wall Street. The four story office building also consists of an attached 10,000 square foot, two story, secured parking garage that sits below grade at the intersection of Kimball Way and Lower Wall Street. The site is rectangular in shape and encompasses approximately 0.1148 acres (or 5000 square feet) located in land lot 77, of the 14th District of Atlanta, Fulton County. The property is in an area that has been heavily developed since the 1800s.

Phase I and Phase II Environmental Site Assessments were completed on behalf of Panthers on Pryor, LLC during the period of May through July 2012. Soil and groundwater samples were collected during the Phase II Assessment. The findings of the Assessment indicated that a concentration of 407 milligrams per kilogram (mg/kg) of lead was detected in a soil sample collected beneath the concrete slab of the lowest level of the parking deck. The concentrations of metals in the other soil samples were below the HSRA Notification Concentrations (NCs). The soil and groundwater samples collected during the project were also analyzed for volatile organic compounds (VOCs) and polynuclear aromatic hydrocarbons (PAHs). No VOCs or PAHs compounds were detected in the samples.

The source of the lead in the subsurface soil is unknown, but the lead appears to be associated with a zone of discolored soil. No human exposure to the lead is anticipated.



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

July 06, 2012

Scott Kimbrough
ENVIRONOMICS, INC
6637 SPRING ST.
DOUGLASVILLE GA 30134

TEL: (770) 489-8540
FAX: (770) 947-2594

RE: GSU - 40 Pryor St Shallow Soils

Dear Scott Kimbrough:

Order No: 1207131

Analytical Environmental Services, Inc. received **3** samples on 7/3/2012 3:50:00 PM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

- NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/12-06/30/13.
- AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/13.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Mirzeta Kararic
Project Manager



ANALYTICAL ENVIRONMENTAL SERVICES, INC
 3785 Presidential Parkway, Atlanta GA 30340-3704
AES TEL.: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

CHAIN OF CUSTODY

Work Order: 1707131

Date: 7/3/12 Page 1 of 1

#	SAMPLE ID	SAMPLED		Grab	Composite	Matrix (See codes)	ANALYSIS REQUESTED	REMARKS	No # of Containers
		DATE	TIME						
1	40P-55-3-3	7/3/12	14:20	✓		SO	LEAD PAIRS	Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.	
2	40P-55-3-3	7/3/12	14:20	✓		SO			
3	40P-55-4-3	7/3/12	13:50	✓		SO			
4	40P-55-4-5	7/3/12	14:10	✓		SO		NOT SAMPLED (REUSE)	
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY: <i>[Signature]</i>	DATE/TIME: 7/3/12 15:19	RECEIVED BY: <i>[Signature]</i>	DATE/TIME: 7/3/12 15:10
PROJECT NAME: 650-40 Pryor St Shilow	PROJECT #: 120607	PROJECT INFORMATION: 40 Pryor St, Atlanta, GA Lower parking deck	RECEIPT: Total # of Containers: 6
SITE ADDRESS: 40 Pryor St, Atlanta, GA	SEND REPORT TO: 670 + 120 copies, fax	INVOICE TO: (IF DIFFERENT FROM ABOVE)	TURNAROUND TIME REQUEST: <input type="radio"/> Standard 5 Business Days
SHIPMENT METHOD: CLIENT	VIA: UPS MAIL COURIER	QUOTE #:	2 Business Day Rush <input type="radio"/>
SPECIAL INSTRUCTIONS/COMMENTS:			Next Business Day Rush <input type="radio"/>
			Same Day Rush (with req.) <input type="radio"/>
			Other <input type="radio"/>
			STATE PROGRAM (if any):
			E-mail? Y/N; Fax? Y/N
			DATA PACKAGE: I II III IV

SAMPLES RECEIVED AFTER 3PM OR ON SATURDAY ARE CONSIDERED RECEIVED THE NEXT BUSINESS DAY. IF TURNAROUND TIME IS NOT INDICATED, AES WILL PROCEED WITH STANDARD TAT OF SAMPLES.
SAMPLES ARE DISPOSED 30 DAYS AFTER REPORT COMPLETION UNLESS OTHER ARRANGEMENTS ARE MADE.
MATRIX CODES: A - Air GW - Groundwater SG - Sediment SO - Soil SW - Surface Water W - Water (Blanks) DW - Drinking Water (Blanks) O - Other (specify) WW - Waste Water
PRESERVATIVE CODES: H+1 = Hydrochloric acid + ice I = Ice only N = Nitric acid S+1 = Sulfuric acid + ice SM+1 = Sodium Bisulfite/Methanol + ice NA = None

Analytical Environmental Services, Inc

Date: 6-Jul-12

Client: ENVIRONOMICS, INC	Client Sample ID: 40P-SS-3-3
Project Name: GSU - 40 Pryor St Shallow Soils	Collection Date: 7/3/2012 2:20:00 PM
Lab ID: 1207131-001	Matrix: Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
POLYAROMATIC HYDROCARBONS SW8270D					(SW3550C)			
Naphthalene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Acenaphthylene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
1-Methylnaphthalene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
2-Methylnaphthalene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Acenaphthene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Fluorene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Phenanthrene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Anthracene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Fluoranthene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Pyrene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Benz(a)anthracene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Chrysene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Benzo(b)fluoranthene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Benzo(k)fluoranthene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Benzo(a)pyrene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Dibenz(a,h)anthracene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Benzo(g,h,i)perylene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Indeno(1,2,3-cd)pyrene	BRL	380		ug/Kg-dry	163455	1	07/05/2012 13:17	EI
Surr: 2-Fluorobiphenyl	84.4	51.9-120		%REC	163455	1	07/05/2012 13:17	EI
Surr: 4-Terphenyl-d14	108	60.2-120		%REC	163455	1	07/05/2012 13:17	EI
Surr: Nitrobenzene-d5	79.5	45.6-120		%REC	163455	1	07/05/2012 13:17	EI
METALS, TOTAL SW6010C					(SW3050B)			
Lead	96.6	5.65		mg/Kg-dry	163437	1	07/05/2012 12:54	MR
PERCENT MOISTURE D2216								
Percent Moisture	12.3	0		wt%	R224497	1	07/05/2012 12:00	AS

Qualifiers:	* Value exceeds maximum contaminant level	E Estimated (value above quantitation range)
	BRL Below reporting limit	S Spike Recovery outside limits due to matrix
	H Holding times for preparation or analysis exceeded	Narr See case narrative
	N Analyte not NELAC certified	NC Not confirmed
	B Analyte detected in the associated method blank	< Less than Result value
	> Greater than Result value	J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc

Date: 6-Jul-12

Client: ENVIRONOMICS, INC	Client Sample ID: 40P-SS-4-3
Project Name: GSU - 40 Pryor St Shallow Soils	Collection Date: 7/3/2012 1:50:00 PM
Lab ID: 1207131-002	Matrix: Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
POLYAROMATIC HYDROCARBONS SW8270D					(SW3550C)			
Naphthalene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Acenaphthylene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
1-Methylnaphthalene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
2-Methylnaphthalene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Acenaphthene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Fluorene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Phenanthrene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Anthracene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Fluoranthene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Pyrene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Benz(a)anthracene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Chrysene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Benzo(b)fluoranthene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Benzo(k)fluoranthene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Benzo(a)pyrene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Dibenz(a,h)anthracene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Benzo(g,h,i)perylene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Indeno(1,2,3-cd)pyrene	BRL	400		ug/Kg-dry	163455	1	07/05/2012 13:43	EI
Surr: 2-Fluorobiphenyl	83.9	51.9-120		%REC	163455	1	07/05/2012 13:43	EI
Surr: 4-Terphenyl-d14	104	60.2-120		%REC	163455	1	07/05/2012 13:43	EI
Surr: Nitrobenzene-d5	86.2	45.6-120		%REC	163455	1	07/05/2012 13:43	EI
METALS, TOTAL SW6010C					(SW3050B)			
Lead	407	5.65		mg/Kg-dry	163437	1	07/05/2012 12:58	MR
PERCENT MOISTURE D2216								
Percent Moisture	18.5	0		wt%	R224497	1	07/05/2012 12:00	AS

Qualifiers:	* Value exceeds maximum contaminant level	E Estimated (value above quantitation range)
	BRL Below reporting limit	S Spike Recovery outside limits due to matrix
	H Holding times for preparation or analysis exceeded	Narr See case narrative
	N Analyte not NELAC certified	NC Not confirmed
	B Analyte detected in the associated method blank	< Less than Result value
	> Greater than Result value	J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc

Date: 6-Jul-12

Client: ENVIRONOMICS, INC	Client Sample ID: 40P-SS-4-5
Project Name: GSU - 40 Pryor St Shallow Soils	Collection Date: 7/3/2012 2:00:00 PM
Lab ID: 1207131-003	Matrix: Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
POLYAROMATIC HYDROCARBONS SW8270D					(SW3550C)			
Naphthalene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Acenaphthylene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
1-Methylnaphthalene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
2-Methylnaphthalene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Acenaphthene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Fluorene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Phenanthrene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Anthracene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Fluoranthene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Pyrene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Benz(a)anthracene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Chrysene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Benzo(b)fluoranthene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Benzo(k)fluoranthene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Benzo(a)pyrene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Dibenz(a,h)anthracene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Benzo(g,h,i)perylene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Indeno(1,2,3-cd)pyrene	BRL	420		ug/Kg-dry	163455	1	07/05/2012 14:09	EI
Surr: 2-Fluorobiphenyl	87.9	51.9-120		%REC	163455	1	07/05/2012 14:09	EI
Surr: 4-Terphenyl-d14	109	60.2-120		%REC	163455	1	07/05/2012 14:09	EI
Surr: Nitrobenzene-d5	90.2	45.6-120		%REC	163455	1	07/05/2012 14:09	EI
METALS, TOTAL SW6010C					(SW3050B)			
Lead	17.8	5.98		mg/Kg-dry	163437	1	07/05/2012 13:02	MR
PERCENT MOISTURE D2216								
Percent Moisture	21.9	0		wt%	R224497	1	07/05/2012 12:00	AS

Qualifiers:	* Value exceeds maximum contaminant level	E Estimated (value above quantitation range)
	BRL Below reporting limit	S Spike Recovery outside limits due to matrix
	H Holding times for preparation or analysis exceeded	Narr See case narrative
	N Analyte not NELAC certified	NC Not confirmed
	B Analyte detected in the associated method blank	< Less than Result value
	> Greater than Result value	J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Environomics

Work Order Number 1207/31

Checklist completed by [Signature] Date 07/03/2012

Carrier name: FedEx UPS Courier Client US Mail Other

Shipping container/cooler in good condition? Yes No Not Present

Custody seals intact on shipping container/cooler? Yes No Not Present

Custody seals intact on sample bottles? Yes No Not Present

Container/Temp Blank temperature in compliance? (4°C±2)* Yes No

Cooler #1 3, 5 Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler #5 _____ Cooler #6 _____

Chain of custody present? Yes No

Chain of custody signed when relinquished and received? Yes No

Chain of custody agrees with sample labels? Yes No

Samples in proper container/bottle? Yes No

Sample containers intact? Yes No

Sufficient sample volume for indicated test? Yes No

All samples received within holding time? Yes No

Was TAT marked on the COC? Yes No

Proceed with Standard TAT as per project history? Yes No Not Applicable

Water - VOA vials have zero headspace? No VOA vials submitted Yes No

Water - pH acceptable upon receipt? Yes No Not Applicable

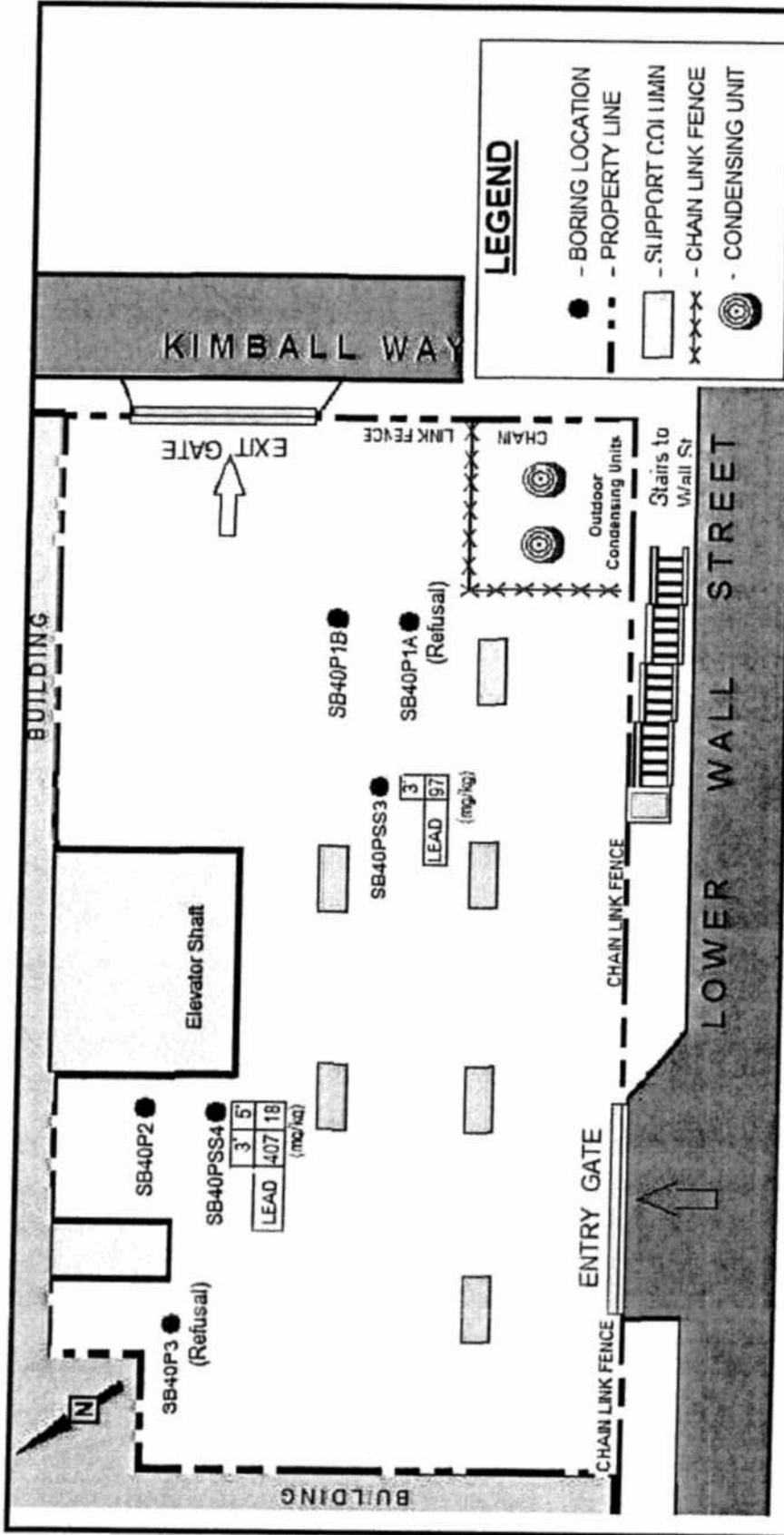
Adjusted? _____ Checked by _____

Sample Condition: Good Other(Explain) _____

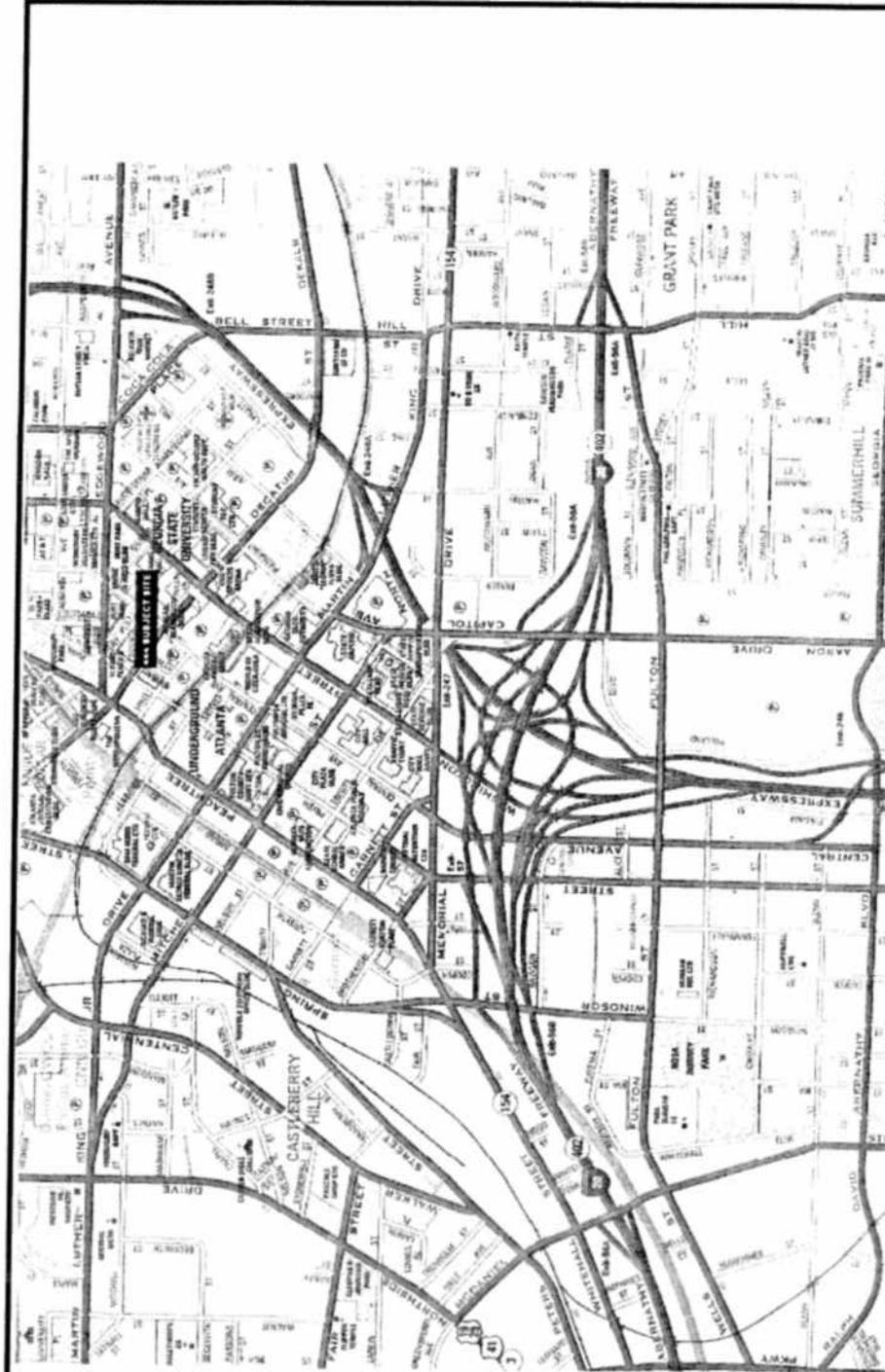
(For diffusive samples or AIHA lead) Is a known blank included? Yes No

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.



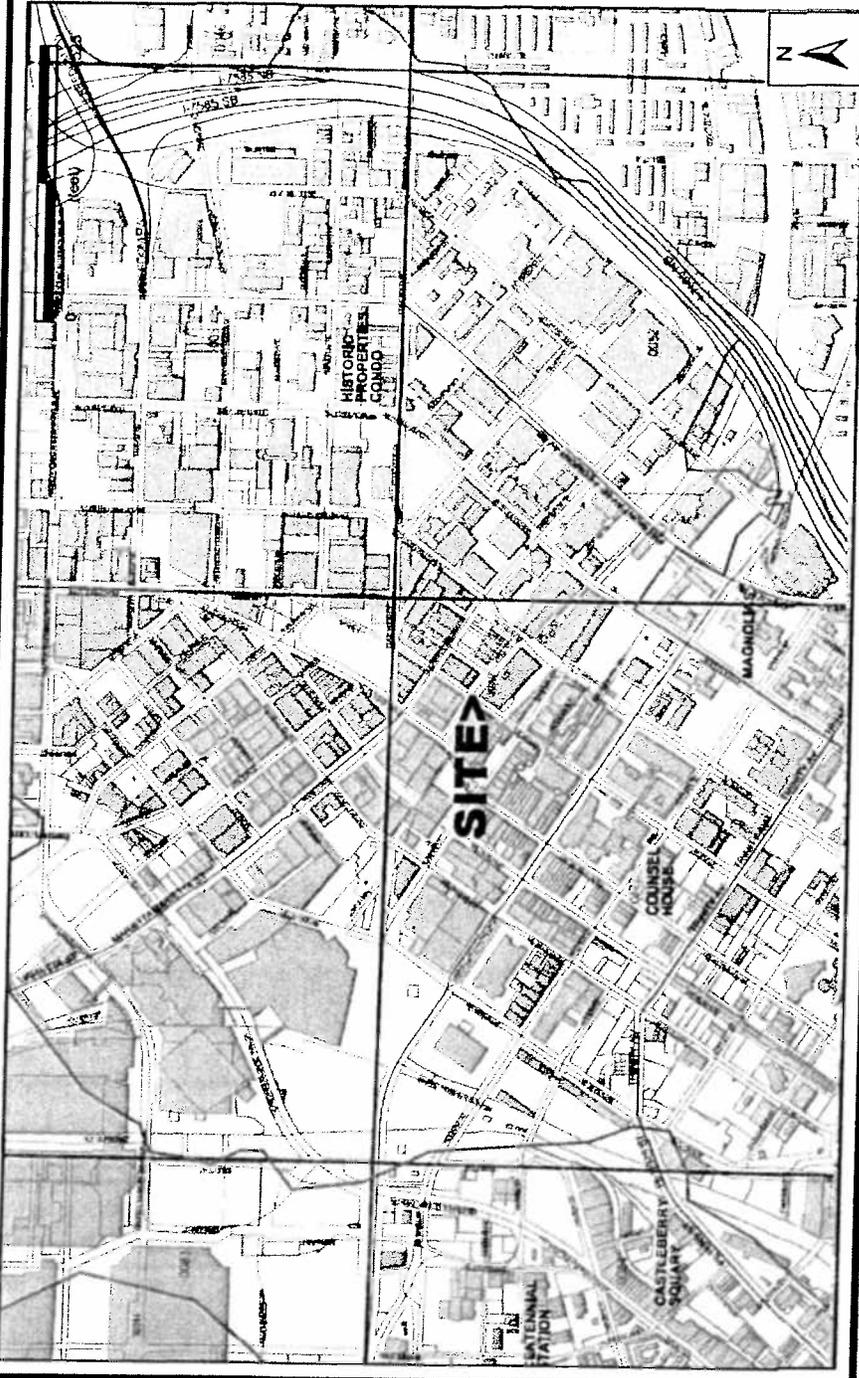
Date: 9/17/12	Scale: N/A	Job No: 120901	Source: Fulton County Tax Maps
Environomics, Inc. P. O. BOX 865 Douglasville, Georgia 30133		Sample Location Plan 40 Pryor Street Atlanta, Georgia 30303	



Date: 07/0612 **Scale:** N/A **Job No:** 120607 **Source:** ADC 16th Edition Greater Atlanta

Environomics, Inc.

Site Location Map
 40 Pryor Street
 Atlanta, Georgia



Date: 9/17/2012

Scale: N/A

Job No: 12090301

Source: Fulton County Tax Maps

Environomics, Inc.
 P. O. Box 865
 Douglasville, Georgia 30133

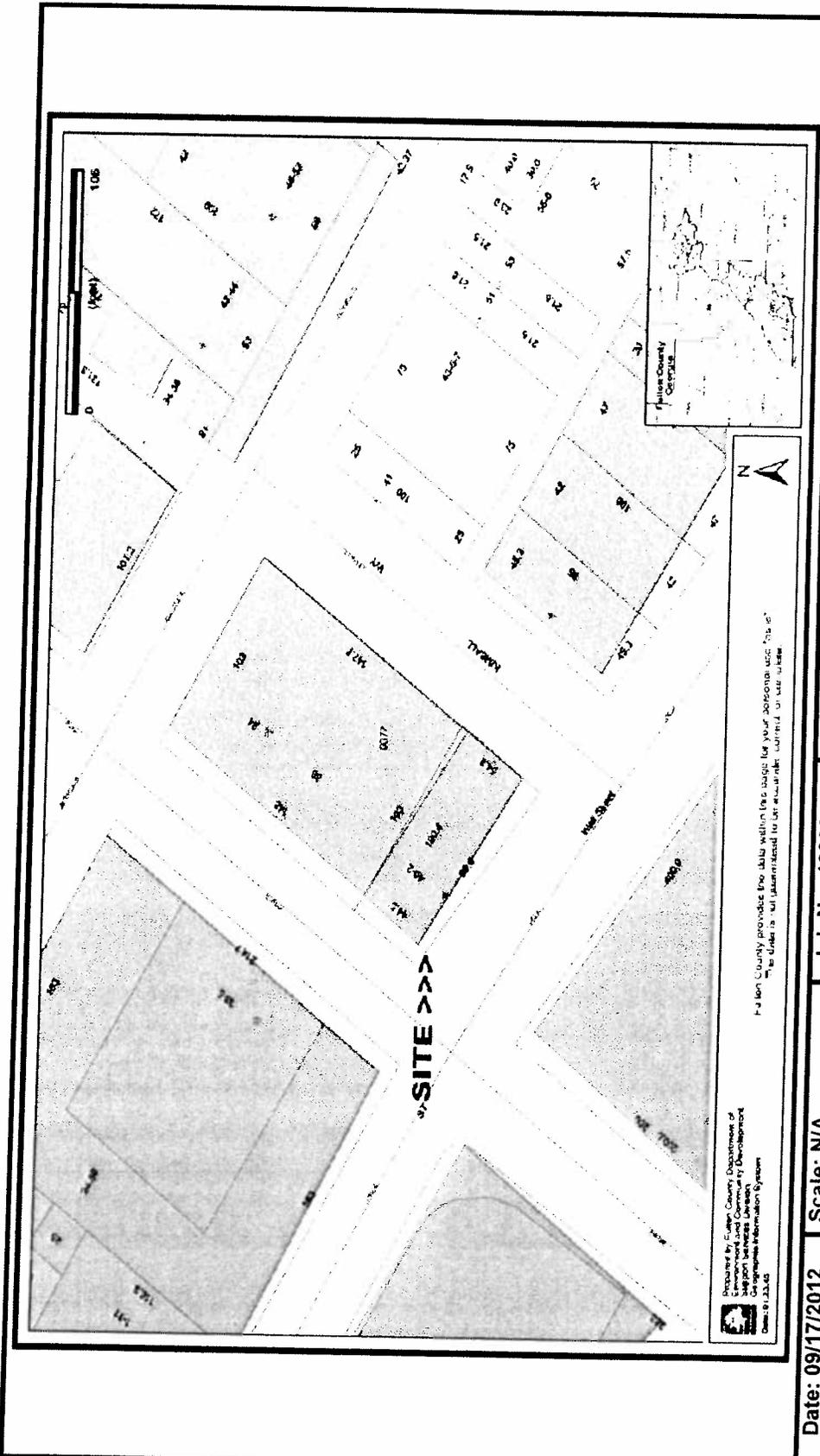
Figure
Site Location Map
 40 Pryor Street
 Atlanta, Georgia 30303



Date: 9/17/12	Scale: N/A	Job No:	Source: USGS Maps
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Environomics, Inc.
 P. O. BOX 865
 Douglasville, Georgia 30133

Topographical Map
 40 Pryor Street
 Atlanta, Georgia 30303



Date: 09/17/2012

Scale: N/A

Job No: 12090301

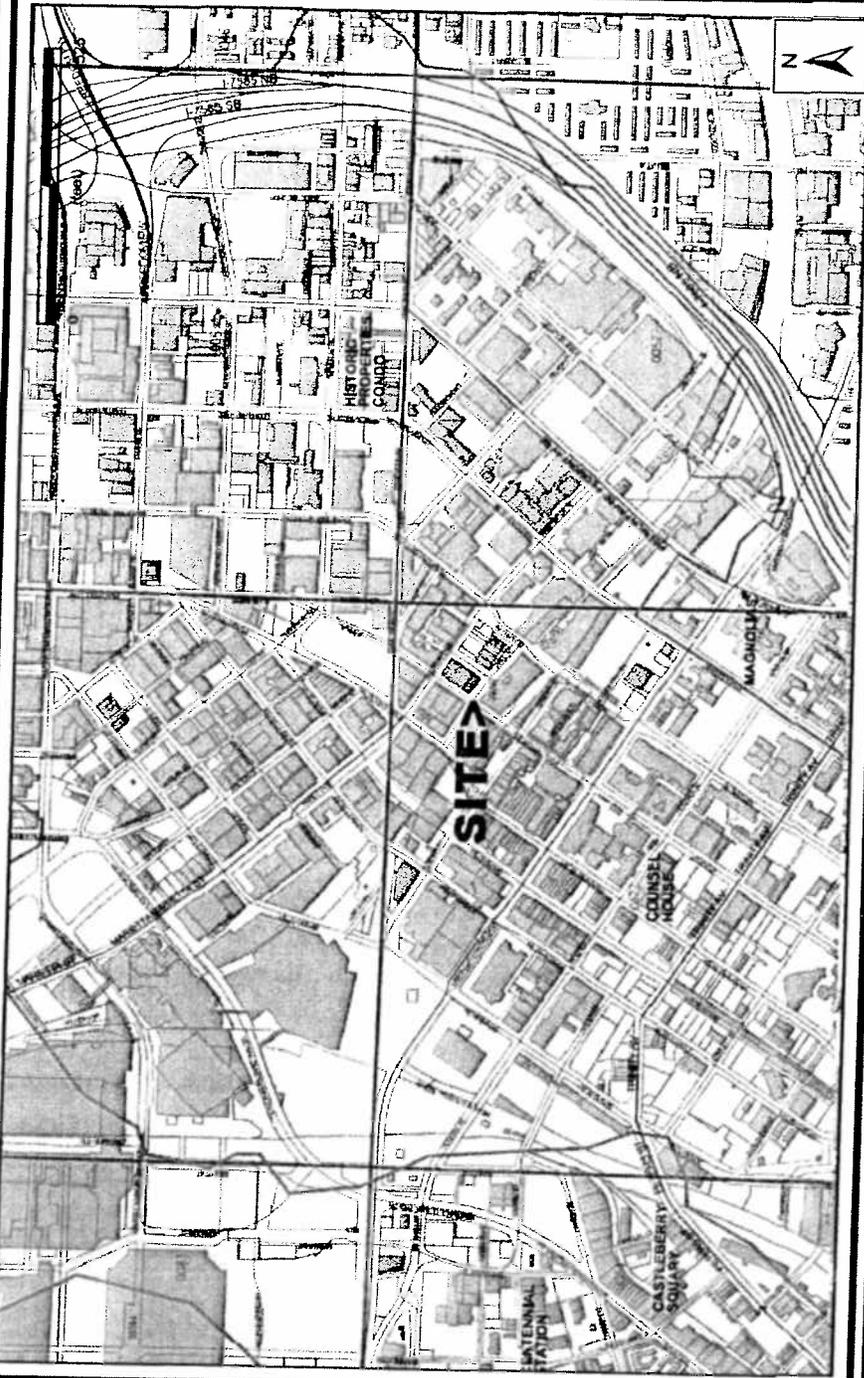
Source: Fulton County Tax Assessors Maps

Environomics, Inc.

P. O. Box 865
Douglasville, Georgia 30133

Tax Parcel Map

40 Pryor Street
Atlanta, Georgia 30303



Date: 9/17/2012

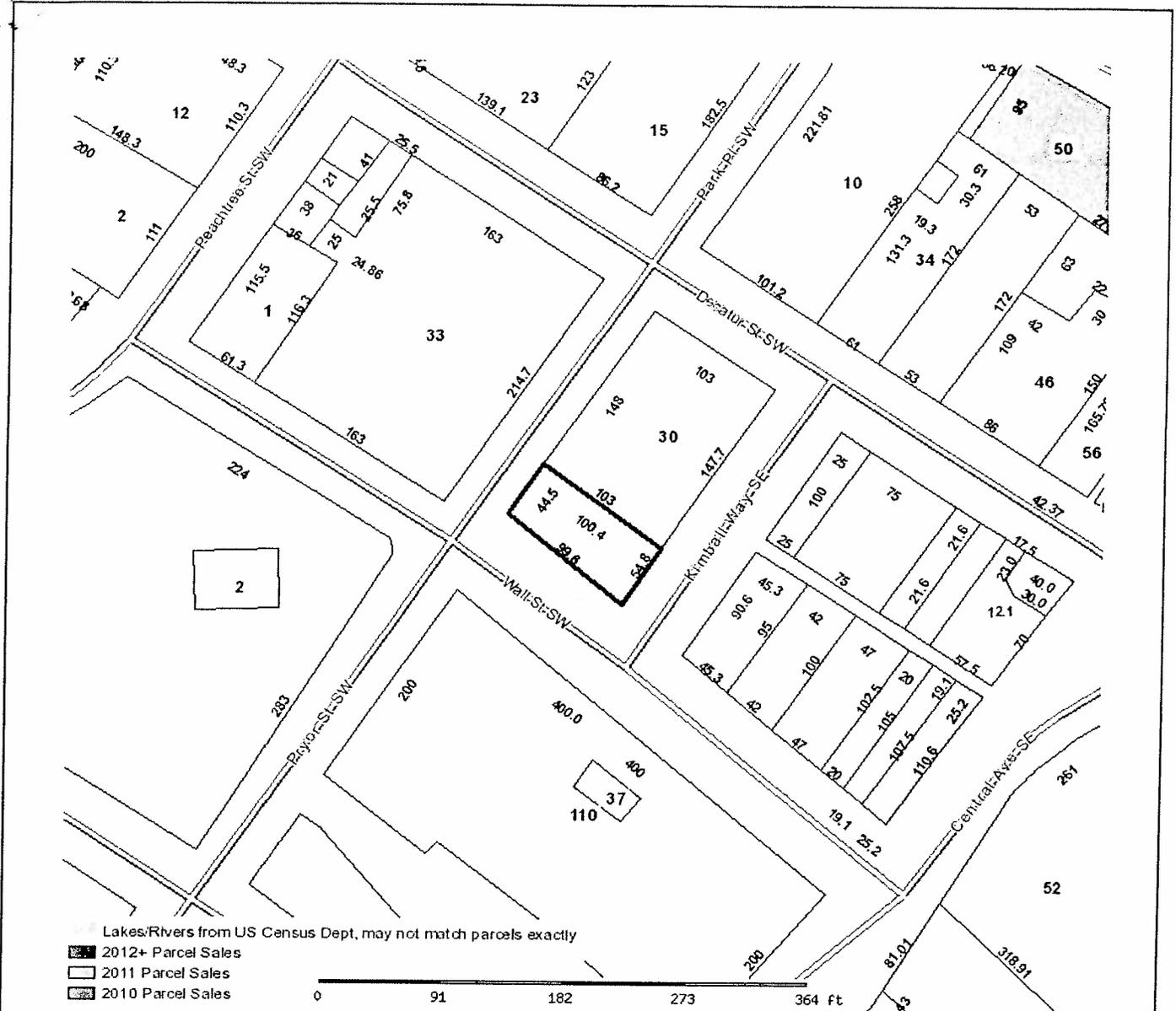
Scale: N/A

Job No: 12090301

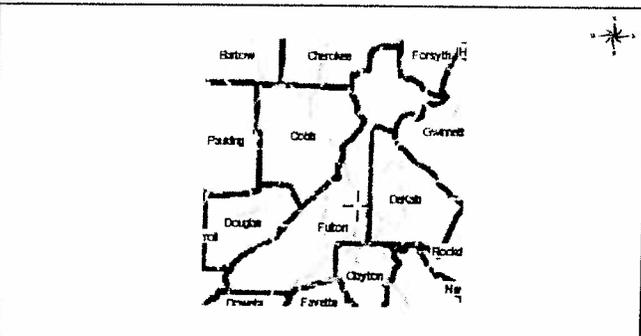
Source: Fulton County Tax Maps

Environomics, Inc.
 P. O. Box 865
 Douglasville, Georgia 30133

Figure
Site Location Map
 40 Pryor Street
 Atlanta, Georgia 30303



Fulton County Assessor			
Parcel: 14 007700040187 Acres: 0			
Name:	BENICH TIMOTHY A	Land Value:	\$ 538,100
Site:	40 PRYOR ST	Building Value:	\$ 190,540
Sale:	\$475,000 on 1982-04-01 Reason=U Qual=9	Misc Value:	0
Mail:	USA	Total Value:	\$ 728,640
	MARIETTA, GA 30067		



The Fulton County Assessor's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified taxroll. All data is subject to change before the next certified taxroll. PLEASE NOTE THAT THE PROPERTY APPRAISER MAPS ARE FOR ASSESSMENT PURPOSES ONLY NEITHER FULTON COUNTY NOR ITS EMPLOYEES ASSUME RESPONSIBILITY FOR ERRORS OR OMISSIONS —THIS IS NOT A SURVEY—
Date printed: 09/21/12 : 02:53:46

6027

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

NOV 1 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)	Not Applicable			
3	Tax Map and Parcel ID Number:	04-14531	Acreage	1.65	
4	Site or Facility Name	Cannon's Point Former Cattle Dip Vat			
5	Site Street Address	525 Cannon's Point Drive			
6	Site City	St. Simons Island	County	Glynn	Zip 31522
7	Property Owner	CD Preserve, LLC			
8	Property Owner Mailing Address	1624 Frederica Road, Suite 6			
9	Property Owner City	St. Simons Island	State	GA	Zip 31522
10	Property Owner Telephone No.	912-638-9185			
11	Site Contact Person	Mr. Joseph Strength	Title	General Counsel	
12	Site Contact Company Name	Gilbert, Harrell, Sumerford & Martin, P.C.			
13	Site Contact Mailing Address	P.O Box 190			
14	Site Contact City	Brunswick	State	GA	Zip 31521
15	Site Contact Telephone No.	(912) 265-6700			
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.

Joseph F. Strength
NAME (Please type or print)

Attorney for CD Preserve, LLC

SIGNATURE

TITLE
October 25, 2012

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 suspected source of detected regulated substance(s) is from the historical operations of an on-site cattle dip vat (CDV) from the 1920s to approximately the 1960s for the purpose of treating local livestock, including cattle and horses, as part of a State-wide effort to eradicate the tick responsible for transmitting a disease called "southern cattle fever".

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 collected using Direct Push Technology (DPT) from soil borings installed in the vicinity of the former CDV and analyzed for chlorinated pesticides, polynuclear aromatic hydrocarbons (PAHs), and arsenic as part of a Limited Phase II ESA.

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

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

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

The site is restricted from the general public by a locked gate at the entrance of Cannon's Point Drive; only the property owner and private residents of nearby and/or adjoining out parcels can access the site.

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.

Soil samples were collected from 0-4 feet bgs and analyzed as part of a Limited Phase II ESA. Analyses of soil samples collected on the east and south sides of the former CDV indicate that soil impacts are covered by approximately 2 feet of soil that does not contain concentrations of regulated substances above the applicable Notification Concentrations (NCs). Analyses of soil samples collected on the north side of the former CDV indicate that soil impacts are covered by approximately 6-inches of soil that does not contain concentrations of regulated substances above the applicable NCs. Analyses of soil samples collected on the west side of the former CDV indicate that soil impacts are present at the surface.

PART II -- RELEASE INFORMATION

(Continued)

P.

6. Indicate the approximate distance from the edge of the area affected by the release to the nearest 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: Katherine J & Paul F O'Connor

Address: 50 Cheapside Lane, 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

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.

Not Applicable

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>.



Cannon's Point Former Cattle Dip Vat

St. Simons Island, Glynn County, Georgia

SITE SUMMARY

The area of concern comprises an approximate 1.65-acre parcel of land, Glynn County Parcel Identification Number (PIN) 04-14531, located at 525 Cannons Point Drive, on St. Simons Island, in Glynn County, Georgia, herein referred to as the *property*. A Project Location Map is provided as **Figure 1**. A copy of a 2011 aerial photograph, annotated with the approximate *property* boundaries based on a client-provided boundary survey, is provided as **Figure 2**.

The *property* is currently vacant, wooded land. Concrete remnants associated with barrier walls of a former cattle dip vat are located on a central portion of the *property*. The former cattle dip vat was approximately 35-feet long and 5-feet wide and was reportedly in operation from the 1920s to approximately the 1960s for the purpose of treating local livestock, including cattle and horses, as part of a State-wide effort to eradicate the tick responsible for transmitting a disease called "southern cattle fever". When dipping operations ceased at the *property*, the cattle dip vat was reportedly filled in with soil for safety measures.

ESI conducted a Limited Phase II ESA on the *property* in order to confirm or dismiss the presence of contaminants of concern associated with the former use of the on-site cattle dip vat. All field activities, including soil and groundwater sampling, were conducted on 2 October 2012.

Using a direct push technology (DPT) macro-core soil sampler, ESI advanced eight (8) soil borings (SS-1, SS-1A, SS-2, SS-2A, SS-3, SS-3A, SS-4 and SS-5) in a horizontal grid pattern within the vicinity of the former cattle dip vat; refer to **Figure 3** for a depiction of the approximate soil boring locations. At each soil boring location, ESI personnel collected representative, composite soil samples from the 0-6 inches, 6 inches-2 feet, and 2-4 feet below ground surface (bgs) depth intervals. A total of twenty four (24) soil samples were submitted to a NELAC-certified laboratory. Initially, fifteen (15) soil samples from the soil borings closest to the cattle dip vat (including soil borings SS-1, SS-2, SS-3, SS-4, and SS-5) were analyzed for contaminants of concern using EPA Method 8081 (chlorinated pesticides), 8270C (polynuclear aromatic hydrocarbons), and 6010 (arsenic). The remaining nine (9) soil samples collected from soil borings SS-1A, SS-2A, and SS-3A were held for laboratory analysis pending the confirmation of contaminants within the closest soil samples.

The initial analyses of fifteen (15) soil samples collected from soil borings SS-1, SS-2, SS-3, SS-4, and SS-5 yielded no concentrations of contaminants of concern above the laboratory Method Detection Limits (MDL) and/or the applicable Georgia Notification Concentrations (NCs), except for the following:

- Soil sample collected from the 2-4 feet bgs depth interval at soil boring SS-1 yielded a concentration of arsenic at 41.6 mg/kg, above the applicable NC of 41.00 mg/kg;
- Soil sample collected from the 2-4 feet bgs depth interval at soil boring SS-2 yielded a concentration of arsenic at 50.9 mg/kg, above the applicable NC of 41.00 mg/kg;
- Soil samples collected from 0-6 inches, 6 inches-2 feet, and 2-4 feet bgs depth intervals at soil boring SS-3 yielded concentrations of arsenic at 52.3 mg/kg, 189 mg/kg, and 146 mg/kg, respectively, all above the applicable NC of 41.00 mg/kg; and
- Soil samples collected from 6 inches-2 feet and 2-4 feet bgs depth intervals at soil boring SS-4 yielded concentrations of arsenic at 88.7 mg/kg and 59.2 mg/kg, respectively, all above the applicable NC of 41.00 mg/kg.

Subsequently, the remaining soil samples collected from soil borings SS-1A, SS-2A, and SS-3A were analyzed for arsenic only. Analyses of soil samples collected from soil borings SS-1A and SS-2A yielded no concentrations of arsenic above the applicable Georgia NC. Additionally, arsenic was not detected in the soil sample collected from the 0-6 inch bgs depth interval at soil boring SS-3A above the applicable Georgia NC. Analyses of soil samples collected from 6 inches-2 feet, and 2-4 feet bgs depth intervals at soil boring SS-3A yielded arsenic concentrations at 53.4 mg/kg and 71.0 mg/kg, respectively, above the applicable NC of 41.00 mg/kg.

Table 1 identifies all laboratory analytes that were revealed within soil samples collected from the 0-6 inches, 6 inches-2 feet, and 2-4 feet bgs depth intervals at soil borings SS-1, SS-1A, SS-2, SS-2A, SS-3, SS-3A, SS-4, and SS-5 at concentrations above the respective laboratory MDLs.

Attachment 3 includes copies of the Chain-of-Custody forms and the laboratory analytical results for all of the soil samples collected as part of ESI's Limited Phase II ESA.

At soil boring locations SS-1, SS-1A, SS-2A, SS-3A, and SS-5, ESI and a licensed water well driller advance a DPT discreet groundwater sampler below the local groundwater table (approximately 6-feet bgs) to collect representative groundwater samples. Refer to **Figure 3** for a depiction of the approximate direct push groundwater sample locations. A total of six (6) groundwater samples were submitted to a NELAC-certified laboratory; five (5) of the groundwater samples were analyzed for contaminant of concern using EPA Method 8081 (organochlorine pesticides), 8270C (polynuclear aromatic hydrocarbons), and 6010 (arsenic). Groundwater sample DP-1A was held for laboratory analysis pending the confirmation of contaminants within groundwater sample DP-1.

Laboratory analyses of groundwater sample DP-1 yielded beta-BHC at a concentration of 0.0000022 mg/L, between the Laboratory MDL and the Practical Quantitation Limit (PQL). No other parameters in the analytical test suite were detected in groundwater sample DP-1 above the applicable Laboratory MDLs.

Laboratory analyses of groundwater sample DP-2A yielded beta-BHC at a concentration of 0.0000011 mg/L, between the Laboratory MDL and the PQL. No other parameters in the analytical test suite were detected in groundwater sample DP-2A above the applicable Laboratory MDLs.

Laboratory analyses of groundwater sample DP-3A yielded arsenic at a concentration of 0.0118 mg/L, above the Georgia Rule 391-3-19, Appendix III, Table 1. Groundwater Criteria of 0.01 mg/L. No other parameters in the analytical test suite were detected in groundwater sample DP-3A above applicable Laboratory MDLs.

Laboratory analyses of groundwater sample DP-4 yielded arsenic at a concentration of 0.0753 mg/L, above the Georgia Rule 391-3-19, Appendix III, Table 1. Groundwater Criteria of 0.01 mg/L. Additionally, beta-BHC and delta-BHC were identified at concentrations of 0.0000033 mg/L and 0.00000098 mg/L, respectively, between the applicable Laboratory MDLs and PQLs. No other parameters in the analytical test suite were detected in groundwater sample DP-4 above applicable Laboratory MDLs.

Laboratory analyses of groundwater sample DP-5 yielded no concentrations of contaminants of concern above the applicable Laboratory MDLs.

Table 2 identifies all laboratory analytes that were revealed within groundwater samples DP-1, DP-2, DP-3, DP-4, and DP-5 at concentrations above the respective laboratory MDLs. **Attachment 3** includes copies of the Chain-of-Custody forms and the laboratory analytical results for all of the groundwater samples collected as part of ESI's Limited Phase II ESA.

The *property* owner, CD Property, LLC, anticipates the completion of additional soil assessment at the *property* in an effort to fully determine the vertical and horizontal extent of arsenic impacts identified within the soil on the *property*.

Additionally, in order to confirm or dismiss the presence of contaminants of concern identified in DPT groundwater samples DP-1, DP-2, DP-3, DP-4 during ESI's previous Limited Phase II ESA, a total of four (4) permanent groundwater monitoring wells will be installed by ESI and a licensed water well driller at these previous sampling locations where contaminants of concern were identified at concentrations above the applicable groundwater criteria and/or the laboratory MDLs. ESI will collect groundwater samples from each of the newly installed monitoring wells in accordance SESD Operating Procedure SESDPROC-301-R2. A total of four (4) groundwater samples will be submitted to a NELAC-certified laboratory for analysis of Contaminants of Concern (COCs) by EPA Methods 6010 (dissolved/total arsenic) and/or 8081 (chlorinated pesticides).

Following the delineation of the extent of horizontal and vertical arsenic impacts in soil on the *property*, all impacted soil above Type 3 or Type 4 RRS values for arsenic will be remediated using direct excavation and off-site disposal or other methods deemed appropriate based on site specific conditions.

Please note, the *property* owner, CD Preserve, LLC, contemporaneously submitted a Prospective Purchaser Corrective Action Plan (PPCAP) for the *property* pursuant to the Georgia Hazardous Site Reuse and Redevelopment Act. The PPCAP was submitted to Georgia Environmental Protection Division (EPD) on 26 October 2012. As such, ESI respectfully requests the Georgia EPD Hazardous Site Response Program defer the Reportable Quantities Screening Method (RQSM) scoring for the soil release at the *property* until after the PPCAP is implemented.

ENVIRONMENTAL SERVICES, INC.
131 Hutchinson Island Road, Suite 100
Savannah, Georgia 31421
Phone 912-236-4711 * Fax 912-236-3668

www.environmentalservicesinc.com

26 October 2012

RECEIVED
Georgia EPD

NOV 1 2012

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

Response and Remediation Program

RE: Release Notification
Cannon's Point Former Cattle Dip Vat
525 Cannon's Point Drive
St. Simons Island, Glynn County, Georgia
ESI Project No. SJ12043.01

Received

OCT 26 2012

Coastal District
EPD

Dear Mr. Brownlee:

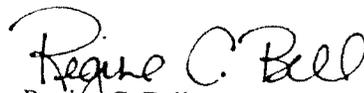
Environmental Services, Inc. (ESI) has completed Limited Phase II Environmental Site Assessment (ESA) activities at the above-referenced site (**Figure 1** and **Figure 2**) herein referred to as the *property*. Based on soil analytical results obtained from the Limited Phase II ESA activities conducted at the *property*, soil concentrations of arsenic have been identified that require notification to the Georgia EPD under Rule 391-3-19-.04(3). On behalf of the *property* owners, CD Preserve, LLC, ESI has prepared a Release Notification Form included as **Attachment 1**.

Please note that CD Preserve, LLC has contemporaneously submitted a Prospective Purchaser Corrective Action Plan (PPCAP) for the *property* pursuant to the Georgia Hazardous Site Reuse and Redevelopment Act. The PPCAP was submitted to Georgia Environmental Protection Division (EPD) on 26 October 2012. As such, ESI respectfully requests the Georgia EPD Hazardous Site Response Program defer the Reportable Quantities Screening Method (RQSM) scoring for the soil release at the *property* until after the PPCAP is implemented.

Should you have any questions regarding this Release Notification or require additional assistance, please contact the undersigned at your convenience.

Sincerely yours,

ENVIRONMENTAL SERVICES, INC.



Regina C. Bell
Asst. Vice President/Senior Manager

(Attachments)

2012
Hazardous Waste