

6056  
**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 6 2013  
 Response and Remediation

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

**PART I -- PROPERTY INFORMATION**  
 (Please type or print legibly)

2	EPA ID NUMBER (if applicable)			
3	Tax Map and Parcel ID Number:	003-027-001, 003-027-002, 019-016-012, 019-016-010		
4	Site or Facility Name	Property at 839 Veterans Parkway	Acreage	≈ 1.4
5	Site Street Address	839 Veterans Parkway (4 <sup>th</sup> Ave)		
6	Site City	Columbus	County	Muscogee
7	Property Owner	The Medical Center, Inc.	Zip	31901
8	Property Owner Mailing Address	707 Center St., Suite 400, Attn: Scott Hill, Chief Operating Officer		
9	Property Owner City	Columbus	State	GA
10	Property Owner Telephone No.	706-660-6105	Zip	31901
11	Site Contact Person	Michael Licause	Title	Property Manager
12	Site Contact Company Name	The Medical Center, Inc.		
13	Site Contact Mailing Address	707 Center St., Suite 400, Attn: Scott Hill, Chief Operating Officer		
14	Site Contact City	Columbus	State	GA
15	Site Contact Telephone No.	706-660-6418	Zip	31901
16	Facility Operator Contact Person	Michael Licause	Title	Property Manager
17	Facility Operator Company Name	The Medical Center, Inc.		
18	Facility Operator Mailing Address	707 Center St., Suite 400, Attn: Scott Hill, Chief Operating Officer		
19	Facility Operator City	Columbus	State	GA
20	Facility Operator Telephone No.	706-660-6418	Zip	31901

**1. 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)  
**Scott Hill**

TITLE **Chief Operation Officer**  
 DATE **1/29/12**

## 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 known source of the release, including the source of this information:  
The source of the release is currently unknown, but is presumed to have originated from offsite.
2. Release dates(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):  
The release was discovered during a Phase II ESA. The impacted media was groundwater. The source of the release is currently unknown, but is presumed to have originated from offsite. Release dates and quantities 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).  
No actions have been taken to address the release.

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.  
Access to the site is limited by fencing or structures on the west, south and east. A structure partially blocks access from the north. The fencing on the south and east is not entirely on the subject site (it is in part on the adjacent property), but still limits access to the site by the general public.

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 identified.

## 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: David J. Jankowski

Address: 824 3<sup>rd</sup> Avenue, Columbus, 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  
 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.

### 9. SITE SUMMARY

### REQUIRED ATTACHMENTS

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>.





**ATTACHMENT 1**

## 9.A. SITE SUMMARY

The subject property (which is comprised of tax parcels 003-027-001, 003-027-002, 019-016-012 and 019-016-010) is located on the west side of Veterans Parkway (formerly 4<sup>th</sup> Avenue), south of its intersection with 9<sup>th</sup> Street, in Columbus, Muscogee County, Georgia. The subject property address is listed as 839 Veterans Parkway. The property totals approximately 1.4 acres. Two commercial structures, related to a former automobile dealership, are located on the subject property. The remainder of the property, not occupied by the structures, is paved parking, with some landscaped areas. Based on the results of a Phase I ESA performed at the site, as well prior knowledge of a former onsite underground storage tank (UST), a Phase II ESA was performed at the site to address a former adjacent dry cleaning facility, as well as the former UST and an onsite oil/water separator (OWS).

The area around the site is a mix of commercial and residential. The site is bordered on the north by 8<sup>th</sup> Street, across which is a vacant former automobile dealership. The site is bordered on the east by Veterans Parkway, across which is a KFC restaurant and several residential structures. To the west, the site is bordered by 3<sup>rd</sup> Avenue, across which is a parking lot and several historic residential structures, that are currently used as offices (except further south along 3<sup>rd</sup> Avenue, where some are still used as residences). To the south, the site is bordered by a commercial structure (tattoo parlor) in the east, and a single family residential structure in the west.

The release was identified during a Phase II ESA (the report of which is dated December 19, 2012) performed at the site, to address the former adjacent dry cleaning facility, the former onsite UST and the onsite OWS. Utilizing a truck-mounted CME-55 drill rig, equipped with hollow stem augers, three borings were installed into the subsurface at the subject site, with a temporary monitoring well emplaced into two of the borings. The boring/temporary monitoring well locations are illustrated on the Boring Location Plan included in Attachment 2. Soil samples were collected from each boring and screened with a PID. Samples submitted for laboratory analysis were selected based on the field screening, as well as other field observations. Three soil samples (one from each boring) were submitted for laboratory analyses. The results of the soil analyses did not indicate any chemicals of concern (COC) in concentrations exceeding the laboratory detection limits.

A total of two groundwater samples were retrieved from the temporary monitoring wells and submitted for laboratory analysis for BTEX (UST) or VOCs (Dry Cleaners). Copies of the analytical reports for the soil and groundwater samples are included with the Phase II ESA in Attachment 3. The results of the groundwater analyses did not indicate any chemicals of concern (COC) in concentrations exceeding the laboratory detection limits, except for 1,1,2-Trichlorotrifluoroethane (at 0.0018 mg/l) in the sample identified as Dry Cleaners.

It is anticipated that the release originated from an unknown offsite source, most likely in the area of the former dry cleaning facility.

No additional work has been performed to investigate, clean up, or otherwise remediate the property.

**ATTACHMENT 2**

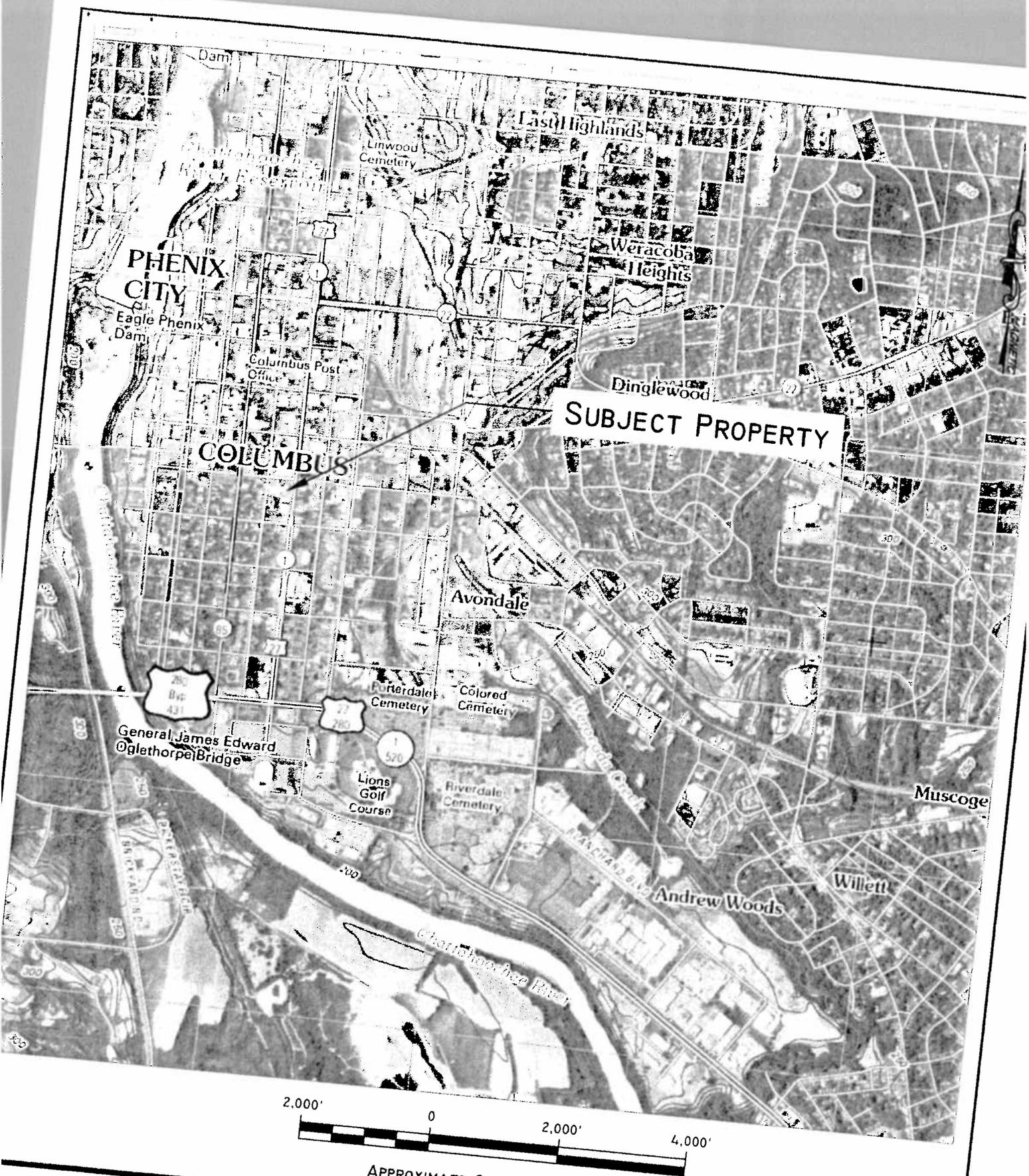
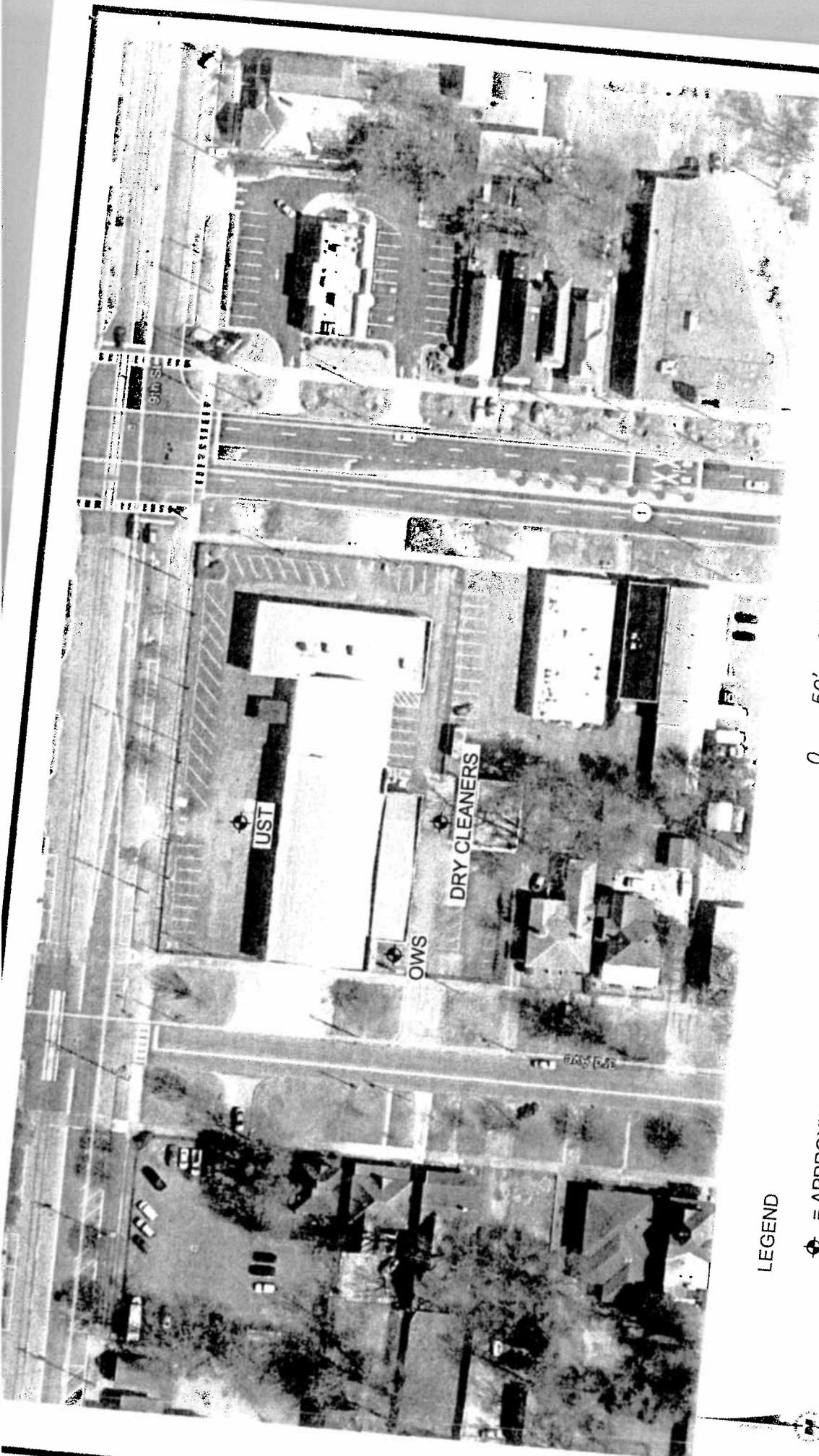


FIGURE 1  
 SITE LOCATION MAP  
 PROPERTY AT  
 839 VETERANS PARKWAY  
 COLUMBUS, MUSCOGEE COUNTY, GEORGIA  
 GEC PROJECT NO.: 120771.341

**GEC**  
 GEOTECHNICAL  
 &  
 ENVIRONMENTAL  
 CONSULTANTS, INC.

5031 MILGEN COURT  
 COLUMBUS, GEORGIA 31907  
 706-569-0008 (Fax) 706-569-0940  
 WWW.GECONSULTANTS.COM



LEGEND

◆ = APPROXIMATE BORING LOCATION  
 UST



IMAGE SOURCE: GOOGLE EARTH 2012

FIGURE 2  
 BORING LOCATION PLAN  
 PROPERTY AT  
 839 VETERANS PARKWAY  
 COLUMBUS, GEORGIA  
 GEC PROJECT NO. 120771.341

**GEC**  
 GEOTECHNICAL  
 &  
 ENVIRONMENTAL  
 CONSULTANTS

5031 MILGEN COURT  
 COLUMBUS, GEORGIA 31907  
 706-569-0008 (Fax) 706-569-0940

**ATTACHMENT 3**

6057.

# 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 6 2013

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:				
4	Site or Facility Name			Acreage	3.48
5	Site Street Address	Buckhead Marketplace			
6	Site City	35-77 West Places Ferry Road			
		Atlanta	County	Fulton	Zip
7	Property Owner	30305			
8	Property Owner Mailing Address	Buckhead Market (Edens), LLC			
9	Property Owner City	1221 Main Street, Suite 1000			
10	Property Owner Telephone No.	Columbia	State	SC	Zip
					29201
11	Site Contact Person	Gerald Pouncey, Jr.			
12	Site Contact Company Name			Title	Attorney
13	Site Contact Mailing Address	Morris, Manning & Martin, LLP			
14	Site Contact City	3343 Peachtree Road, N.E.			
15	Site Contact Telephone No.	Atlanta	State	GA	Zip
		404-233-7000			303264
16	Facility Operator Contact Person				
17	Facility Operator Company Name			Title	
18	Facility Operator Mailing Address				
19	Facility Operator City				
20	Facility Operator Telephone No.			State	Zip

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.

**Buckhead Market (Edens), LLC.**  
By: Edens Limited Partnership, a Delaware limited partnership, its sole member  
By: Edens GP, LLC, a Delaware limited liability company, its sole general  
By: Jude Peck, Environmental Risk Manager

SIGNATURE Jude Peck DATE February 5, 2013

## 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 known source of the release, including the source of this information:  
The suspected source of the release is the former drycleaner which operated on the subject property.
2. Release date(s) and any known information about the history of the release, including the physical state of material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):  
The release date is unknown.
3. Describe those actions that have been taken to investigate, cleanup or otherwise remediate this release (e.g. removal of source of contamination; soil or water sampling performed; and monitoring wells installed and sampled).  
Soil and groundwater sampling was performed as part of pre-purchase 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

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

## PART II -- RELEASE INFORMATION

(Continued)

Page 2 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: 88 West Paces Ferry

7. Indicate the distance between the area affected by the release and the nearest drinking water well (including well 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.

### 9. SITE SUMMARY

### REQUIRED ATTACHMENTS

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>.





## Site Summary

The subject property consists of 3.48 acres of land and contains the Buckhead Marketplace shopping center. The property is located at 35-77 West Paces Ferry Road in Atlanta, Fulton County, and contains an L-shaped shopping center. The existing buildings were developed in the mid 1960s although there have been numerous renovations over time. Prior to the redevelopment of the shopping center (and its associated subsurface parking deck created in 2005-2007) in the mid 1960s, the property had contained several commercial businesses.

Based upon the review of a previous Phase I Environmental Assessment of the subject property dated October 23, 2012 and prepared by Sailors Engineering, two former onsite operations were identified as potential Recognized Environmental Conditions (RECs): 1) A radiator shop, Buckhead Radiator, which was noted as having operated between 1953 and 1957 and 2) A former drycleaner, Jac's Drycleaning, which operated on the property and reportedly used PCE between 1965-1993. In addition, a former drycleaner which had previously operated off-site and 125 feet east/southeast and upgradient of the subject property (Trio Laundry at 3078 Roswell Road) received a No Listing letter in 2007 for PCE in groundwater and had been noted as a potential off-site concern.

Soil and groundwater testing was performed on the subject property in early January 2013 by the new property owner. Soil and groundwater testing was performed in the areas of the former onsite suspect operations and along the upgradient property line. Nine (9) soil borings were installed and seven (7) hand-augered borings were installed. The soil samples were analyzed for volatile organic compounds (VOCs), semi-VOCs, and metals. Twelve (12) groundwater samples were also collected and analyzed for VOC and SVOC analyses. The soil samples contained minor levels of chloroform, PCE, and metals, but none of the detected concentrations exceeded the notification concentrations under the Georgia Rules for Hazardous Site Response. PCE and chloroform were detected in the groundwater. The chloroform, however, was detected in only one of the seven (7) wells which had been located next to the road and a water line. The minor detection of chloroform was not attributed to a release at the property. The highest level of PCE detected in groundwater was 28 parts per billion in B-9.

A recent water well survey dated October 25, 2012 and prepared by Sailors Engineering did not identify any active drinking water wells within a three mile radius of the property. Based upon the data and a lack of wells within a three mile radius, we believe a No Listing letter is warranted for the subject property. In addition, the property owner submitted an application and Brownfield Corrective Action Plan (CAP) to the Georgia Brownfield Program within 30 days of taking title to the property on December 31, 2012. The CAP was approved on January 30, 2013 via the issuance of a Limitation of Liability letter (attached).

Georgia Department of Natural Resources  
Environmental Protection Division

2 Martin Luther King Jr. Dr. SE, Suite 1154E, Atlanta, Georgia  
Judson H. Turner, Director  
Land Protection Branch  
Keith M. Bentley, Branch Chief  
Phone 404/656-7802 FAX 404/651-

January 30, 2013

Mr. Jude Peck  
Buckhead Market (Edens), LLC  
1221 Main Street, Suite 1000  
Columbia, South Carolina, 29201

RE: Brownfield Corrective Action Plan – Buckhead Marketplace property  
35-77 West Paces Ferry Road, Atlanta, Fulton County, Georgia

Dear Mr. Peck:

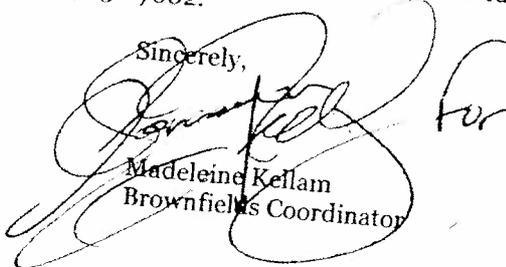
The Georgia Environmental Protection Division (EPD) was pleased to have received your January 28, 2013 application for a limitation of liability pursuant to Article 9 of Chapter 8 of Title 12, the Georgia Hazardous Site Reuse and Redevelopment Act (Act). The application consists of a prospective purchaser corrective action plan (CAP) and a non-refundable \$3,000 application review fee, for which this letter will serve as receipt. The initial application review fee will fund approximately sixty-one hours of technical review at EPD's current cost of \$49 per hour. Although many applications can be reviewed within this time-frame, applications that are complex or that require extensive revisions may incur additional review fees. These will be invoiced quarterly and must be paid in full before a written concurrence with a certification of compliance may be issued.

The subject property is located at 35-77 West Paces Ferry Road, Atlanta, Fulton County, Georgia. The subject property is described as "All that tract or parcel of land lying and being in the City of Atlanta and Land Lot 99 of the 17<sup>th</sup> District of Fulton County, Georgia, ..." A complete legal description of the property is provided as an attachment to this letter. EPD confirms that the Brownfields qualifying criteria established under sections 12-8-205 and 12-8-206 of the Act have been met. The review of the CAP has been completed by EPD, and the CAP is hereby approved.

Under section 12-8-207(a) of the Act, approval of the CAP confers a provisional limitation of liability upon the prospective purchaser, contingent upon timely implementation of the approved CAP and certification of compliance with the risk reduction standards for soil and source material in accordance with the approved schedule. Should unanticipated events or site conditions warrant changes in the CAP or the approved schedule in order to achieve compliance, the prospective purchaser must notify the Director and obtain approval of the proposed modifications.

While the property is undergoing corrective action, it should be maintained in a manner that protects humans from exposure to hazardous constituents. If you have questions, or need further assistance, please contact Kent Pierce or Nikki Haborak at 404/656-7802.

Sincerely,

  
Madeleine Kellam  
Brownfields Coordinator

Attachment: Legal Description

cc: Gerald Pouncey, Esq.  
File: Buckhead Marketplace



Table 2  
 Groundwater Depth Measurements  
 Buckhead Marketplace Shopping Center  
 Atlanta, Fulton County, Georgia  
 January 9 - 10, 2013

Temporary Well	Top of Casing Elevation (feet, Arbitrary Datum)	Depth to Groundwater (feet below TOC)	Groundwater Elevation (feet, Arbitrary Datum)
B-1	86.37	3.92	82.45
B-2	86.58	3.85	82.73
B-3	87.04	3.12	83.92
B-4	87.35	2.96	84.39
B-5	98.08	11.05	87.03
B-6	84.34	2.93	81.41
B-7	87.11	9.67	77.44
B-8	101.10	16.95	84.15
B-9	102.24	15.82	86.42
HA-1	97.65	10.72	86.93
HA-2	97.56	10.39	87.17
HA-7	97.43	10.22	87.21

TOC - Top of Casing  
 Depths to Groundwater Measured January 10, 2013

Summary of Groundwater Analyses  
 Table 3  
 Buckhead Marketplace Shopping Center  
 Atlanta, Fulton County, Georgia  
 January 9 - 10, 2013

Sample Date: Volatiles Organic Compounds (µg/L)	HSRA Notification Concentration													
	B-1 1/10/2013	B-2 1/10/2013	B-3 1/9/2013	B-4 1/9/2013	B-5 1/9/2013	B-6 1/10/2013	B-7 1/9/2013	B-8 1/9/2013	B-9 1/9/2013	HA-1 1/9/2013	HA-2 1/9/2013	HA-7 1/9/2013		
Acetone	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0		
Chloroform	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0		
Tetrachloroethene	<5.0	<5.0	<5.0	<5.0	<5.0	<b>26</b>	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0		
Trichloroethene	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<b>5.3</b>	<5.0	<5.0	<5.0	<5.0	<5.0		
cis-1,2-Dichloroethene	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<b>28</b>	<5.0	<b>6.3</b>	<b>13</b>		
Vinyl Chloride	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0		
<b>Polycyclic Aromatic Hydrocarbons</b>														
All Compounds	ND	ND	--	ND	ND	ND	ND	ND	ND	ND	ND	ND		

µg/L - Micrograms per Liter  
 "<" indicates substance not detected at the laboratory Reporting Limit identified

**Bold** values indicate substance detected above laboratory Reporting Limit identified

BG - Naturally occurring background concentrations (assumed to be laboratory Reporting Limit)

ND - No substances detected for entire parameter category.

HSRA Notification Concentrations obtained from Georgia Rule §391-3-19-04.(3)(a)

"--" indicates sample for Polycyclic Aromatic Hydrocarbons not obtained at B-3 due to low well recovery

Duplicate sample obtained at HA-7

**Legend**

- ◆ - Soil/Groundwater Sample Location
- ◆ - Hand Auger/Shallow Soil Sample
- ◆ - Hand Auger Boring/Temporary Well
- 74.44 - Water Table Elevation (Relative)
- - Water Table Contour
- - Flow Direction

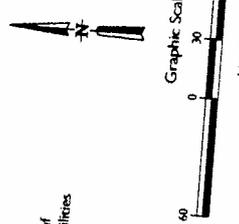
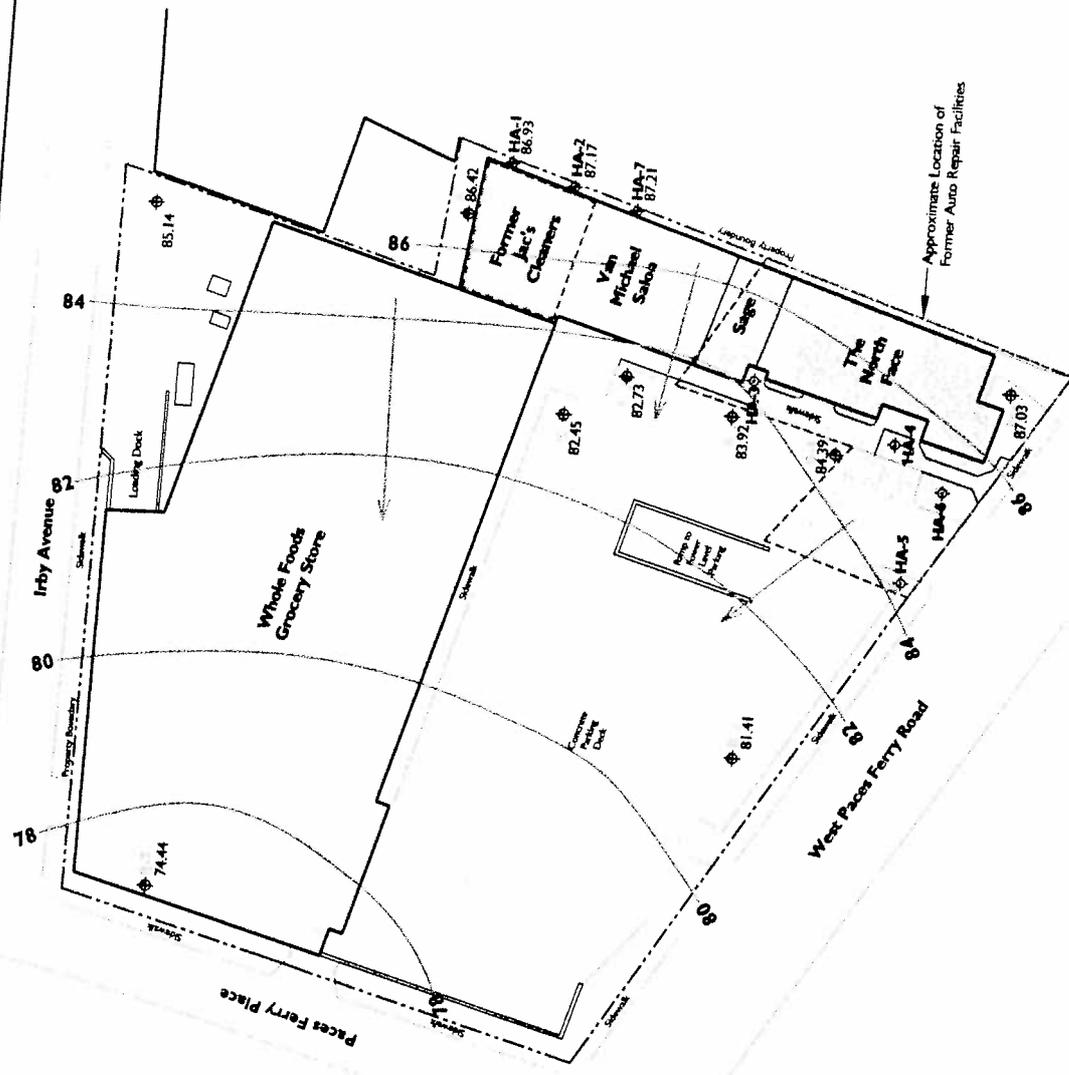


Figure **3**

Potentiometric Map

ENR/Buckhead Potentiometric Map, 2013.01.14

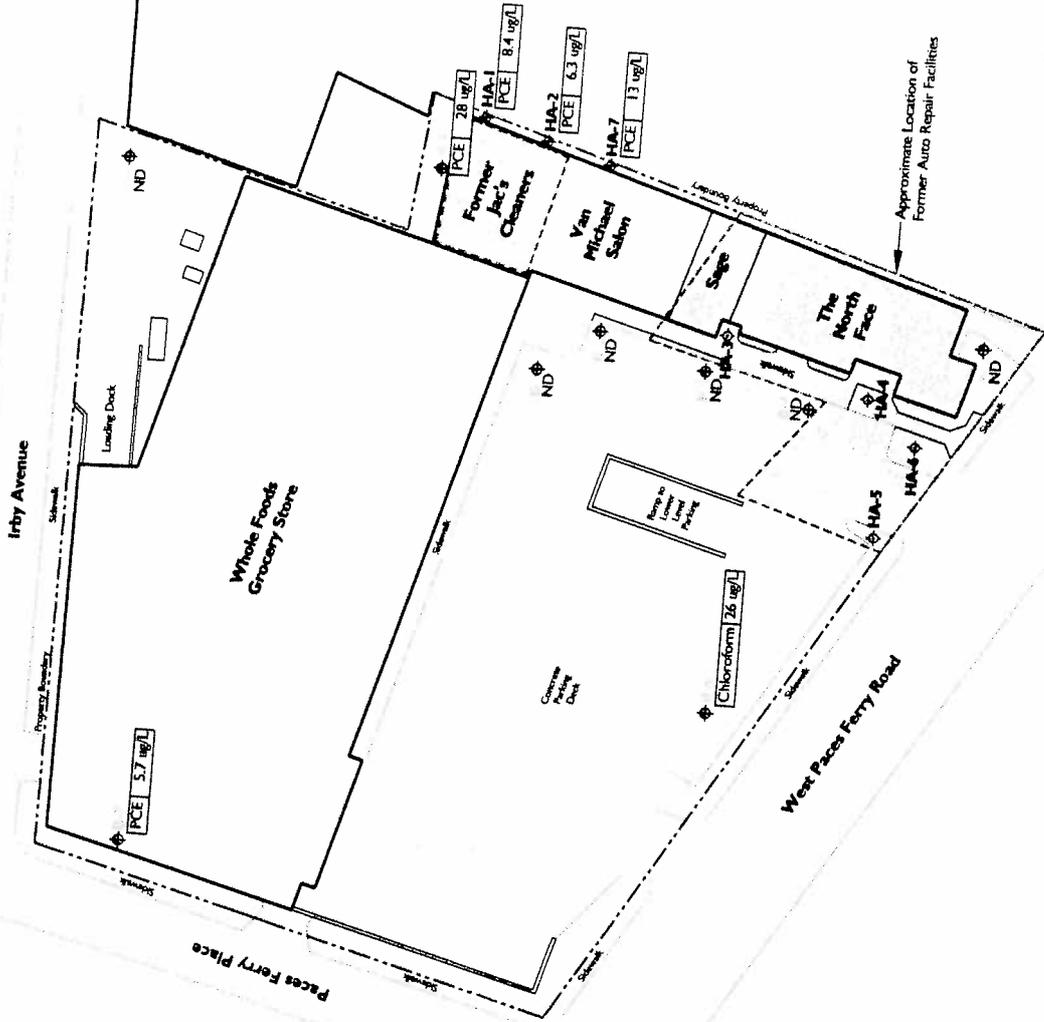
PROJECT #:	EN-2013-1001	TL
SCALE:	1" = 50'	DATE: January 19, 2013
DRAWN BY:		

Buckhead Marketplace  
35-77 West Paces Ferry Road  
Athens, Georgia 30305

**EnPura**  
Renewable Energy & Environmental Solutions

**Legend**

- ◆ - Soil/Groundwater Sample Location
- ◆ - Hand Auger/Shallow Soil Sample
- ◆ - Hand Auger Boring/Temporary Well
- PCE - Tetrachloroethene
- ug/L - Micrograms per Liter
- ND - Not Detected



Renewable Energy & Environmental Solutions

Buckhead Marketplace  
35-77 West Paces Ferry Road  
Athens, Georgia 30305

PROJECT #: EN-2012-1001  
DRAWN BY: TL

SCALE: 1" = 50'  
DATE: January 19, 2013

Groundwater Quality

Figure 4

© EnPura/Buckhead Marketplace, 2013/01/19

6060

# 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 8 2013

Response and Remediation Program

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

## PART I - PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	Not Applicable			
3	Tax Map and Parcel ID Number:	14-0051-0002-0999			
4	Site or Facility Name	Acraage	3.579		
5	Site Street Address	Hotel Site Former Dry Cleaner			
6	Site City	265 Peachtree Center Ave. NE			
		Atlanta	County	Fulton	Zip
7	Property Owner	Black Diamond BGWB14 Inc.			
8	Property Owner Mailing Address	Corporate Trust Center (as registered agent), 1209 Orange Street			
9	Property Owner City	Wilmington			
10	Property Owner Telephone No.	State	DE	Zip	19801
11	Site Contact Person	Not Available			
12	Site Contact Company Name	Title	Outside Counsel		
13	Site Contact Mailing Address	Black Diamond BGWB14 Inc. c/o Proskauer Rose LLP			
14	Site Contact City	Eleven Times Square			
15	Site Contact Telephone No.	State	NY	Zip	10036
		212-969-3243			
16	Facility Operator Contact Person	Scott Clarisey			
17	Facility Operator Company Name	Title	Director of Finance		
18	Facility Operator Mailing Address	Hotel Operator			
19	Facility Operator City	265 Peachtree Center Ave. NE			
20	Facility Operator Telephone No.	State	GA	Zip	30303
		404-586-6108			

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.

BLACK DIAMOND BGWB14 INC BY DEREK WHITE  
NAME (Please type or print) TITLE VICE PRESIDENT  
FOR BLACK DIAMOND BGWB14 INC.

SIGNATURE

DATE FEBRUARY 7, 2013

## PART II -- RELEASE INFORMATION

Page 2 of 2

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, waste pile etc.). Provide specific information on the suspected known source of the release, including the source of this information:**

The suspected source of the identified release is a dry cleaning machine which operated on-site between 1985 and 2001. The out-of-service equipment was removed from the subject property in or about 2008.

**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 of the release resulting in Tetrachloroethene (PCE) being released into groundwater is not known; however, the source may have been associated with the past use of a dry cleaning machine which was operated on-site between 1985 and 2001. PCE liquid was stored and used as a dry cleaning solvent in the area of the building beneath which the PCE impacted groundwater was identified. The quantity of material released is not known; however, volatile organic compound concentrations detected in groundwater samples suggest that the quantity of PCE released was small.

**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).**

In connection with the sale of the property, a limited soil and groundwater investigation was conducted in December 2012 and January 2013. Soil samples were collected from six borings drilled through the concrete floor of the building. The soil sampling indicates that VOCs (including PCE) concentrations were less than the GAEPD Type 1 and Type 3 Risk Reduction Standards. Groundwater samples collected from temporary wells installed in two borings indicate that PCE was detected at concentrations (18.9 ug/L and 10.8 ug/L) exceeding the 5 ug/L Type 1 and Type 3 Risk Reduction Standards. WSP Environment & Energy has been retained as an environmental consultant to address this issue.

**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 suspected source area of the release to groundwater was located in the basement level of the hotel. Access to that area is restricted to a limited number of hotel employees only (i.e., no access to the general public). Surveillance cameras, access cards, and security personnel control access to this area.

**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 reinforced concrete slab is approximately 6-inches thick.

## PART II -- RELEASE INFORMATION

(Continued)

Page 1 of 0

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: See Attachment 1

Address: \_\_\_\_\_

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

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

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

Name: Mr. Brendon Miller, Fulton County Environmental Health Department, confirmed that there are no potable wells within a 1-mile radius of the site.

Address: Not Applicable.

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

- Yes       No

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

### 9. SITE SUMMARY      REQUIRED ATTACHMENTS

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 II, SECTION 9 – RELEASE INFORMATION

### Subject Property Description

The hotel (the "subject property") is located at 265 Peachtree Center Avenue NE, Atlanta, Fulton County, Georgia. The subject property is identified as Tax Parcel ID #14-0051-0002-0999. The subject property consists of an approximately 91,000-square foot, 52-story concrete and steel building on a 3.579-acre parcel. The subject property occupies a city-block and is bounded by Peachtree Center Avenue NE, Baker Street NE, Courtland Street NE, and John Portman Boulevard and is located in a high density commercial district. Commercial buildings (such as hotels, retail stores, and office buildings) are located at the adjoining properties to the north, south, east, and west. The nearest residential area (a high-rise condominium building) is located approximately 530-feet northwest of the subject property. A site location map and land use map are presented in Attachment 1.

### Release Description

A dry cleaner, located on the basement level of the building, operated between 1985 and 2001. The out-of-service equipment was subsequently removed from the subject property in 2008. Tetrachloroethene (PCE) is believed to have been stored and used as a dry cleaning solvent. As part of an environmental due diligence project being conducted at the subject property, a limited site investigation to determine whether soil and/or groundwater quality had been adversely affected was conducted in December 2012 and January 2013. The site investigation included the collection and analysis of soil and groundwater samples. The investigation findings are summarized below:

*Soil:* Soil samples were collected from six borings drilled through the concrete floor of the building to delineate the vertical and horizontal extent of volatile organic compounds (VOCs) in soil. Two of the soil borings were drilled to greater than 10 feet below grade for vertical delineation and the remaining three soil borings were hand augered to a depth of approximately 8 feet below grade. Samples were collected at select intervals based on field measurements of organic vapors (measured with a Photoionization Detector), soil type, or proximity to groundwater. The samples were sent to Pace Analytical and analyzed for VOCs (including PCE).

The sampling indicates that VOC concentrations were less than the laboratory minimum detection limits (which were less than the Georgia Environmental Protection Division ("EPD") Type 1 and Type 3 Risk Reduction Standards).

*Groundwater.* Groundwater samples were collected from two borings (SB-3 and SB-4). Groundwater was encountered approximately 17 to 20 feet below basement floor grade (approximately 30 feet below grade). The samples were sent to Pace Analytical and analyzed for VOCs (including PCE).

PCE was detected in sample SB-3 (18.9 ug/L) and SB-4 (10.8 ug/L) at concentrations exceeding the 5 ug/L EPD Type 1 Risk Reduction Standards (for standard assumption at a residential site) and Type 3 Risk Reduction Standards (for standard assumption at a non-residential site). A copy of the laboratory reports is attached.

### Summary

The limited site investigation indicates that PCE was detected in groundwater at concentrations exceeding the Type 1 and Type 3 Risk Reduction Standards. Previous on-site use of PCE suggests that the dry cleaning equipment operated on-site between 1985 and 2001 is a suspected source. Additional investigation is required to confirm the source of the PCE and to determine the extent of groundwater contamination.

6059

# 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 8 2013

Response and Remediation Pro

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

## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)				
3	Tax Map and Parcel ID Number:	R5026 288		Acreeage	0.90
4	Site or Facility Name	Racetrac #1088			
5	Site Street Address	SW Corner of Scenic Hwy & Oak Rd			
6	Site City	Snellville	County	Gwinnett	Zip 30078
7	Property Owner	Clayton Chatham Sr			
8	Property Owner Mailing Address	320 Bardolier			
9	Property Owner City	Alpharetta	State	GA	Zip 30022
10	Property Owner Telephone No.	770-630-8641			
11	Site Contact Person	Caroline S Thompson	Title	VP/Trust Asset Management	
12	Site Contact Company Name	Wells Fargo			
13	Site Contact Mailing Address	171 17th Street N.W. Bldg 100			
14	Site Contact City	Atlanta	State	GA	Zip 30363
15	Site Contact Telephone No.	404-877-6899			
16	Facility Operator Contact Person	Caroline S Thompson	Title	VP/Trust Asset Management	
17	Facility Operator Company Name	Wells Fargo			
18	Facility Operator Mailing Address	171 17th Street N.W. Bldg 100			
19	Facility Operator City	Atlanta	State	FI	Zip 30363
20	Facility Operator Telephone No.	404-877-6899			

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

Revised May 2008

## 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 known source of the release, including the source of this information:  
unknown

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

As part of a pending real estate transaction, a Phase I/II Environmental Site Assessment was conducted which included soil and groundwater sampling. No soil exceedances were found. Groundwater samples were collected from temporary borings. The groundwater sample in one temporary well exceeded for TCE and Lead. No permanent wells have been installed. Additional, groundwater samples were collected around the location of the detected exceedance. No additional groundwater exceedances were detected.

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.
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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.

## 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: Tyson Judy Brock; BP Property Investment, LLC; Thomas E. & Sarah N. Dutton.

Address: 2203 Norton Rd, Snellville, GA; 2213 Norton Rd, Snellville, GA; 2193 Norton Rd, Snellville, 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 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: Yamil A Widy

Address: 2932 Hickory Trail, Snellville, GA 30078

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.

### 9. SITE SUMMARY

### REQUIRED ATTACHMENTS

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.

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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>.





## GROUNDWATER PATHWAY

HAS A RELEASE TO GROUNDWATER OCCURRED?		SCORE:	
Known (45)      Suspected (10)      Potential Future (5)      No Release (0) (If 45, go to D)		A.	45
<b>SUSCEPTIBILITY RATING:</b> Higher (6)      Average (3)      Lower (0)		1B.	
<b>PHYSICAL STATE:</b> Stable Solid (0)      Unstable Solid (1)      Powder/Ash (2)      Liquid/Gas/Sludge (3)		2B.	
<b>CONTAINMENT:</b> Very Good (0)      Good (1)      Fair (2)      Poor (3)		C.	
<b>REGULATED SUBSTANCE:</b>	CAS# 7439921 127184	Name Lead Tetra chloroethene	1D.
<b>TOXICITY:</b> None (0)      Low (1)      (2)      (3)      (4)      (8)      (16) High		2D.	4
<b>QUANTITY:</b> Threshold (1)      (2)      (3)      (4)      (5)      (6)      (7)      (8) Very Large		3D.	4
<b>EXPOSURE TO GROUNDWATER RELEASE:</b>		1E.	4
Known release ≥ MCL and known human exposure ≥ MCL (25) Known release ≥ MCL and suspected human exposure (20) Known release, no MCL exists, and known human exposure (18) Known release ≥ MCL and known human exposure < MCL (15) Known release, no MCL, and suspected human exposure (12) Suspected release and human exposure suspected (8) Known release ≥ MCL but no human exposure suspected (4) Known release, no MCL and no human exposure suspected (3) Suspected release, but no human exposure suspected (2) Potential future release (1) Known release < MCL (0)			
<b>DISTANCE TO WELL OR SPRING:</b> < ½ mile (16)      ½ - 1 mile (9)      1 - 2 miles (4)      2 - 3 miles (1)      > 3 miles (0)		2E.	4
<b>GROUNDWATER PATHWAY SCORE:</b>		6.5	
<b>THRESHOLD: 10</b>			

$$45 / (8) \times \frac{(8)}{442.8} = 6.5$$

$$S_{gw} = M \times (2D + 3D) \times (1E + 2E) / 442.8$$

$$\text{Where } M = A + [(1B + 2B) \times C]$$

- If A = 45 then M = 45.
- If 2D is unknown, then 2D = 4.
- If 3D is unknown, then 3D = 4.
- If 1E includes known or suspected human exposure, then 2E = 16.
- If 1E = 0, then 2E = 1.

Note: The denominator of 442.8 normalizes the groundwater pathway score to a value between 0 and 100.

## ON-SITE EXPOSURE PATHWAY

ACCESS TO THE SITE:		SCORE:	
Inaccessible (0)    Limited Access (2)    Unlimited Access (4)		A.	4
HAS THERE BEEN A RELEASE?		B.	0
Yes (25)    Suspected (15)    No Release (0)		C.	0
CONTAINMENT:		1D.	
Soil Releases    Very Good (0)    (1)    (2)    (3)    (4)    (5) Poor			
Aboveground Releases:    (0)    (1)    (2)    (3)			
REGULATED SUBSTANCE:	CAS #	Name	
TOXICITY:		2D.	4
None (0)    Low (1)    (2)    (4)    (8)    (16) High		3D.	4
QUANTITY:		1E.	6
Threshold (1)    (2)    (3)    (4)    (5)    (6)    (7)    (8) Very Large		2E.	0
DISTANCE TO NEAREST RESIDENT INDIVIDUAL:		<b>ON-SITE EXPOSURE PATHWAY SCORE:</b>	
<300 (8)    301 - 1000 (6)    1001 - 3000 (4)    3001 - 1 mile (2)    > 1 mile (1)		<b>THRESHOLD: 20</b>	
IS THERE AN ON-SITE SENSITIVE ENVIRONMENT? Yes (1)    No (0)		0	

$$S_o = A \times (B + C) \times (2D + 3D) \times (1E + 2E) / 259.2$$

If A or B is 0, then  $S_o = 0$ .  
 If 2D is unknown, the 2D = 4.  
 If 3D is unknown, the 3D = 4.

Note: The denominator of 259.2 normalizes the on-site exposure pathway score to a value between 0 and 100.

$$S_o = 4 \times (0 + 0) \times (4 + 4) \times (6 + 0) / 259.2 = 0$$

6058

# RELEASE NOTIFICATION/REPORTING FORM



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

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

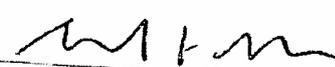
## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	NA			
3	Tax Map and Parcel ID Number:	Tax Parcel Number 17021300160			
4	Site or Facility Name	Pine Haven Mobile Home Park	Acreage	26.5 acres	
5	Site Street Address	848 Sandtown Road			
6	Site City	Marietta			
7	Property Owner	CF MH II Pine Haven LLC	County	Cobb	Zip 30008
8	Property Owner Mailing Address	1345 Ave of Americas, 46 <sup>th</sup> Floor			
9	Property Owner City	New York			
10	Property Owner Telephone No.	212-798-6100	State	NY	Zip 10105
11	Site Contact Person	Ms. Rakky Williamson			
12	Site Contact Company Name	Newbury Management	Title	Property Manager	
13	Site Contact Mailing Address	848 Sandtown Road			
14	Site Contact City	Marietta			
15	Site Contact Telephone No.	404-422-6922	State	GA	Zip 30008
16	Facility Operator Contact Person	Mr. Randy Iaquinto			
17	Facility Operator Company Name	Newbury Management	Title	Manager	
18	Facility Operator Mailing Address	848 Sandtown Road			
19	Facility Operator City	Marietta			
20	Facility Operator Telephone No.	248-538-1206	State	GA	Zip 30008

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.

CF MH II PINE HAVEN LLC, a Delaware limited liability company  
 By: Newbury Management Company, a Michigan S corporation, Its:  
 Authorized Agent

By:   
 Joel K. Brown, Its President

FEB 08 2013 <sup>TITLE</sup>

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:

The suspected source of the release is surface spills or leaks of solvents from dry cleaners located upgradient of the property.

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

The release date is unknown. The material release is suspected to have been in liquid form. The quality of material released is unknown. Offsite dry cleaners continue to operate upgradient of the property. A 2012 Phase I ESA report noted the presence of the dry cleaners.

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 subsurface investigation has been performed at the Site. Soil and groundwater samples were collected and analyzed for VOCs (EPA Method 8260B) via direct-push technology borings. No soil constituents were detected above laboratory reporting limits or NCS. Groundwater contained tetrachloroethene (PCE) above laboratory limits at concentrations of 0.00133 and 0.00254 mg/L. Also chloroform was detected above laboratory limits at concentrations of 0.00321 and 0.00406 mg/L. No remediation has taken place.

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.

Not applicable.

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: Pine Have Mobile Home Park

Address: 848 Sandtown Road, Marietta, 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 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 potential drinking water well.

Name: Shiela J. Murphy

Address: 712 Appleton Drive, Marietta, 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.

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>.





Attachment 2  
Site Summary

**Site Summary**  
**Pine Haven Mobile Home Park**  
**848 Sandtown Road**  
**Marietta, Cobb County, Georgia 30008**

Cardno ATC performed a Phase I Environmental Site Assessment (ESA) Report on the subject property on November 15, 2012. The ESA identified past offsite business activities in an upgradient direction from the subject property which had the potential to impact soil or groundwater with hazardous substances (chlorinated solvents). The areas of potential environmental concern included the following:

- There is a Fair Oaks Cleaners listed in the city directories as being in operation in 1976 and 1980. The cleaner was located at 806 Sandtown Road which is estimated to be upgradient of the property. There is no information as to whether this facility was an on-site dry cleaners, a drop off facility or a coin operated laundry establishment.
- Westside Dry Cleaners formerly operated at 700 Sandtown Road for at least 19 years and was registered as a RCRA Conditionally Exempt Small Quantity Generator (CESQG) until 2003.

It is possible that a previously reported suspected spill mentioned in a past environmental report of the Pine Haven Mobile Home Park property could have been from one of these facilities. There were no apparent current regulatory listings to indicate that any soil or groundwater impact or cleanup case has been documented to date from these possible offsite sources. Additionally, the suspected spill incident that had been presented in a past report is not currently apparent on any state or local regulatory records.

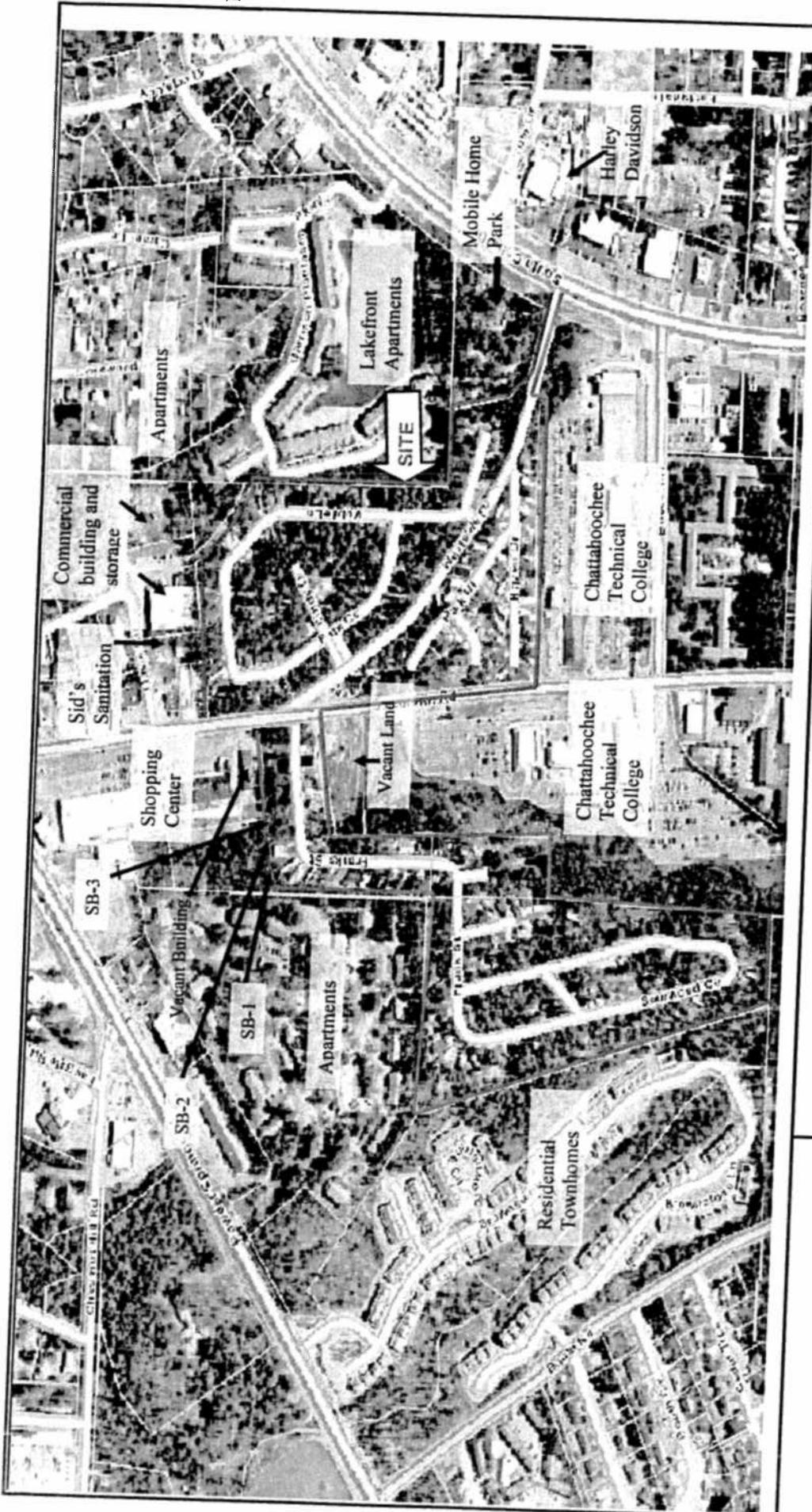
To address these offsite past property use concerns Cardno ATC performed a Phase II Limited Subsurface Investigation of the property on December 3, 2012. Three direct-push test borings were installed on the property at locations based primarily on the location of underground utilities and interpreted to be most likely potentially impacted from activities associated with previous activities on adjacent properties. Soil and groundwater samples were collected from each boring location for analytical testing. The samples were analyzed to determine concentrations of VOCs using appropriate EPA methods. The results of the investigation were compared to applicable regulatory standards. Based on the findings of this investigation, acetone (a VOC) was detected in soil. However, the detected concentration was less than applicable Georgia Hazardous Site Response Act Notification Concentrations (HSRA NC). Tetrachloroethene and Chloroform were detected in groundwater above the laboratory detection limit and appeared to indicate that the property had been impacted from historic use of dry cleaning solvents from off-site sources to the north.

Groundwater sampling was performed using industry accepted methods and methodologies in the EPA Field Branches Quality Systems and Technical Procedures (EPA, 2008). Upon completion of each boring and following purging, each boring was allowed to stabilize. Groundwater depths were recorded from the ground surface of each boring. After purging, groundwater samples were collected from each boring, placed in laboratory-supplied sample jars and stored on site on ice in a cooler. The groundwater samples were placed in appropriate laboratory provided containers, preserved in a cooler with ice, and delivered to Xenco Laboratories in Atlanta, Georgia. Xenco is accredited by the National Environmental Laboratory Accreditation Conference (NELAC) to perform analyses on Resource Conservation and Recovery Act (RCRA) samples as required by Georgia law (O.C.G.A § 12-2-9). Proper chain-of-custody procedures were followed throughout sample collection and handling. Groundwater samples from borings SB-1, SB-2 and SB-3 were analyzed to determine concentrations of VOCs using EPA Method 8260B. Tetrachloroethene was detected in SB-2 at a concentration of 0.00133 milligrams per liter (mg/L) and in SB-3 at a concentration of 0.00254 mg/L. Chloroform was detected in SB-2 at a concentration of 0.00321 mg/L and in SB-3 at a concentration of 0.00406 mg/L. No VOCs were detected in the groundwater sample collected from the SB-1.

Based on the historical use of the adjacent, upgradient properties as dry cleaning facilities and the laboratory results of the collected samples, it appears that the tetrachloroethene and chloroform contamination identified at the Site is likely the result of off-site leaks or spills during the historical operations. The limited subsurface investigation did not define the extent of contamination or the definitive direction of shallow groundwater flow. No actions have been taken to remediate the Property.

Attachment 3

Site Map



**SITE PLAN**  
Scale: Unknown  
Source: Cobb County GIS



1841 West Oak Parkway, Suite F  
MARIETTA, GA 30062  
770-427-9456

**Pine Haven Mobile Home Park**  
848 Sandtown Road Southwest  
Marietta, Cobb County, Georgia  
Cardno ATC Project No. 90.75438.0022



Attachment 4  
Boring Location Map

6061

# 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 16 2013  
Response and Remediation Program

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

## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)				
3	Tax Map and Parcel ID Number:	Parcel ID #12-200-21-003			
4	Site or Facility Name	Dalton Warehosue Bullding	Acreage	0.98 acres	
5	Site Street Address	442 North Hamilton Street			
6	Site City	Dalton	County	Whitfield	Zip 30720
7	Property Owner	Gaddy Rentals, LLC			
8	Property Owner Mailing Address	7372 Applegate Lane			
9	Property Owner City	Chattanooga	State	TN	Zip 37421
10	Property Owner Telephone No.	(706) 217 8236			
11	Site Contact Person	Site is vacant			
12	Site Contact Company Name	Title			
13	Site Contact Mailing Address				
14	Site Contact City				
15	Site Contact Telephone No.	State Zip			
16	Facility Operator Contact Person	Site is vacant			
17	Facility Operator Company Name	Title			
18	Facility Operator Mailing Address				
19	Facility Operator City				
20	Facility Operator Telephone No.	State Zip			

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.

Mr. David Gaddy  
NAME (Please type or print)

SIGNATURE

Owner  
TITLE

2-3-13  
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:**

In June 2012, Terracon performed a Limited Site Investigation at the site for the lender. Various VOCs and SVOCs were detected in soil and/or groundwater. Terracon assumes that the detected constituents of concern are from the historical industrial activities conducted at the site from 1950 through 2011 including a bedspread manufacturing plant and carpet textile and tufting industries.

**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).**

No other assessment activities have been performed at the site other than the 2012 Terracon Limited Site Investigation.

**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.**

Soil samples were collected from inside the warehouse and through the concrete foundation.

## 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

Greater than 1 mile

3001 to 5280 feet

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

Name: Residences

Address: North Hamilton Street, Dalton, 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 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: No active drinking water wells were identified within a one mile radius of the site.

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>.





# Appendix B

**Gaddy Rentals, LLC/Dalton Warehouse Building  
442 North Hamilton Street  
Dalton, Whitfield County, Georgia**

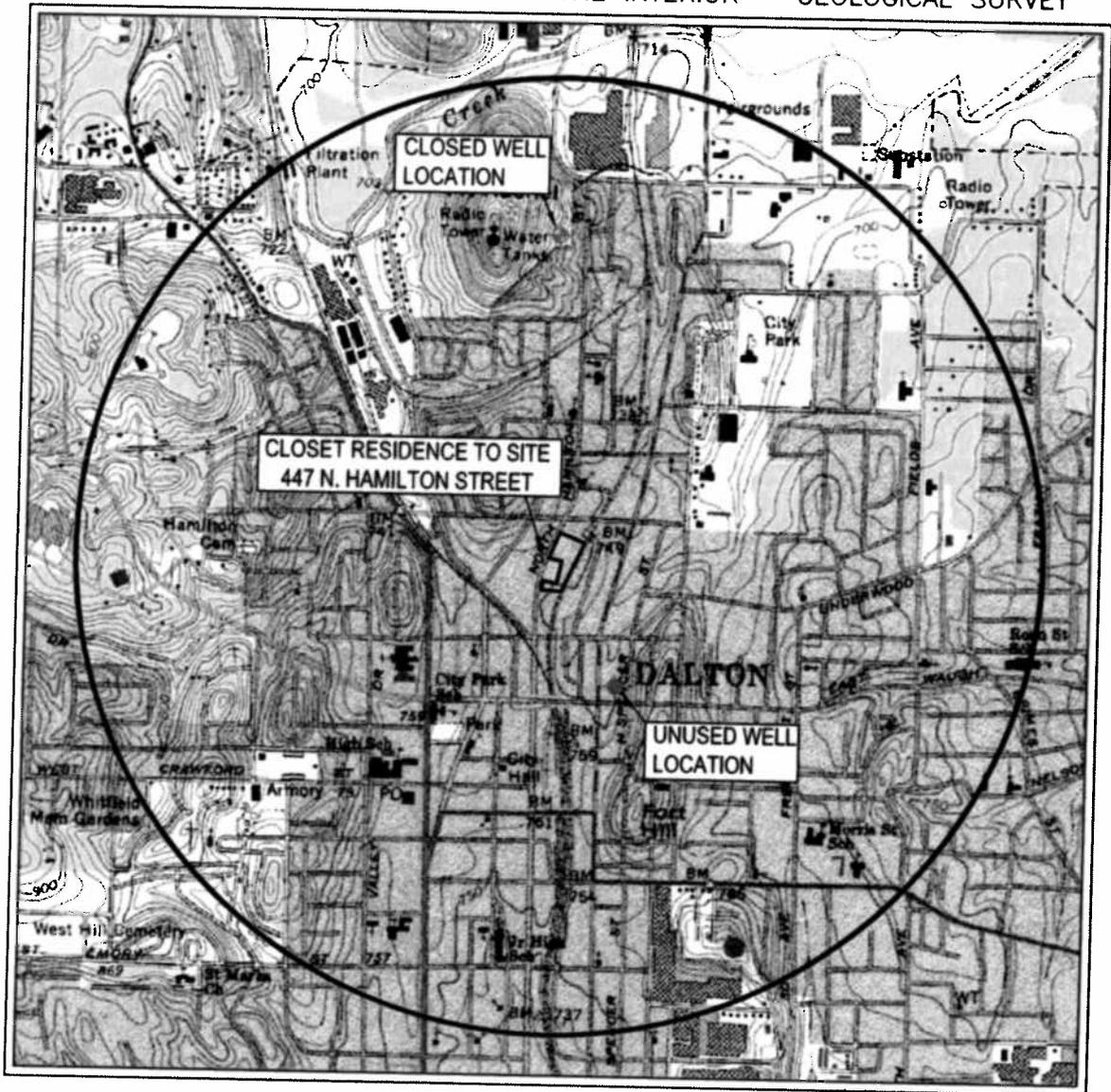
**Site Summary**

As part of an ongoing due diligence assessment being performed by the lender, Terracon Consultants, Inc. (Terracon) performed a Phase I Environmental Site Assessment (ESA) at the site (Terracon Project No.49127003-2, dated April 2, 2012). The site (Parcel No. 12-200-21-003) consists of a 2.73 acre parcel of land developed with a 54,448 square-foot vacant commercial warehouse building located at 442 North Hamilton Street in Dalton, Whitfield County, Georgia. The site has been developed land from the present-day back to approximately 1914. From approximately 1914 until the late 1940s, the site was developed as a residential property. The site was developed as a bedspread manufacturing plant (*National Chenille Products Company*) as early as 1950. Since the 1950s, the site has been utilized as a manufacturing and distribution site for various entities in the carpet, textile, and tufting industries. Additionally, it was determined that a portion of the site building has been utilized since the late 1990s by an industrial supply company who was reported to have operated repair and paint services until approximately 2011 when the building was vacated by both the owner (*Habour Carpet Mills Inc.*) and the associated tenant (*A1- Industrial Supplies Inc.*). At the time of the site reconnaissance, the site building was vacant.

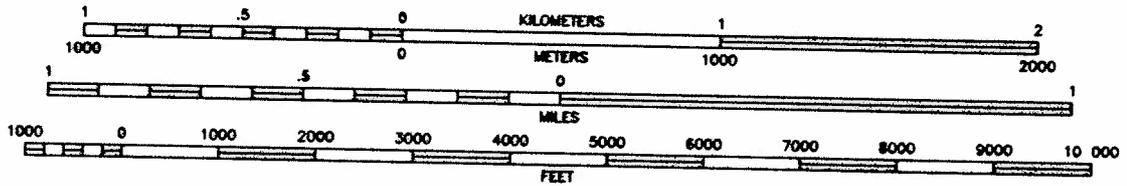
In order to assess potential impacts from the on-site historical industrial operations, Terracon performed a Limited Site Investigation (LSI) at the site (Terracon Project No. 49127003-2A, dated June 8, 2012). The LSI included the collection of five soil samples and three groundwater samples from inside the warehouse and through the concrete foundation. The laboratory analytical results revealed various volatile and semi volatile organic compounds in soil and/or groundwater at the site. Terracon also performed a well survey and did not identify active drinking water wells within a one-mile radius of the site and residences are located within 300 feet of the site. Preliminary RQSM scoring performed by Terracon for cumene/isopropyl benzene did not reveal exceedences of the groundwater pathway or on-site pathway listing thresholds.

# Appendix C

UNITED STATES – DEPARTMENT OF THE INTERIOR – GEOLOGICAL SURVEY



SCALE 1:24 000



CONTOUR INTERVAL FEET  
NATIONAL GEODETIC VERTICAL DATUM OF 1929

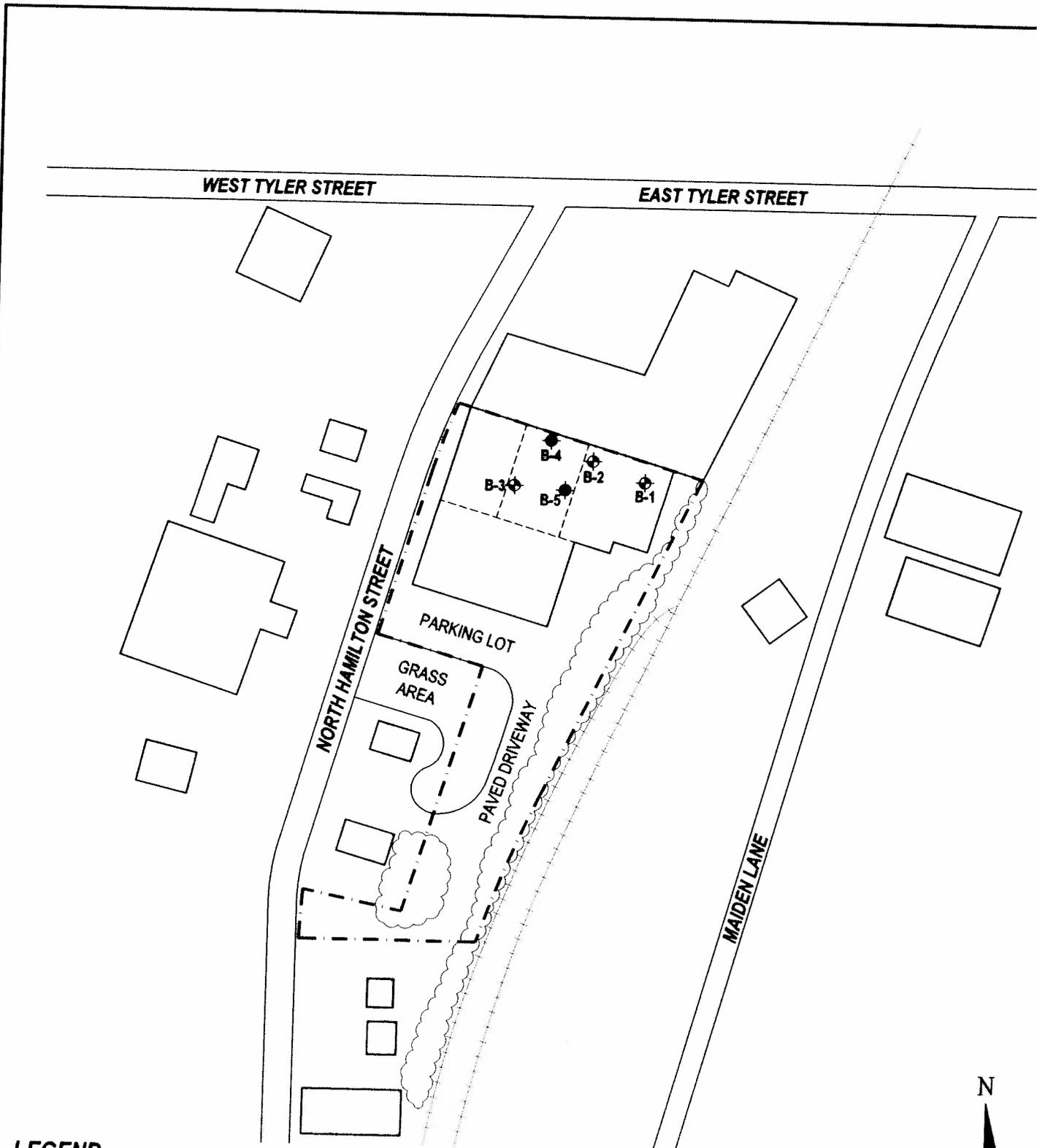
QUADRANGLE

7.5 MINUTE SERIES (TOPOGRAPHIC)



Project Mgr: CC	Project No. 49127003-2B	 2855 Premier Parkway, Suite C Dalton, GA 30097 (770) 623-0755 (770) 623-9629	TOPOGRAPHIC VICINITY MAP	EXHIBIT
Drawn By: TLY	Scale: AS SHOWN		WELL SURVEY	
Checked By: CC/MRF	File No. WS49127003-2B-1		GADDY RENTALS, LLC-DALTON WAREHOUSE BUILDING	
Approved By: JAM	Date: JUNE 2012		442 NORTH HAMILTON STREET DALTON, GA	
				1

# Appendix D



**LEGEND**

- - - - SITE BOUNDARY
- ==== RAILROAD TRACKS
- ◆ SOIL BORING LOCATION
- ◆ TEMPORARY WELL LOCATION

THIS DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

NOT TO SCALE

Project Mngr: CC	Project No. 49127003-2A	 2855 Premiere Parkway, Suite C    Dalton, GA 30097 (770) 623-0755    (770) 623-9629	<b>BORING/ WELL LOCATION DIAGRAM</b>		<b>EXHIBIT</b>
Drawn By: DWD	Scale: AS SHOWN		LIMITED SITE INVESTIGATION		
Checked By: CC/MRF	File No. LSM49127003-2A-2		SITE: 442 NORTH HAMILTON STREET		
Approved By: JAM	Date: MAY 2012		ADDRESS: 442 NORTH HAMILTON STREET		2
		DALTON, GA			

# Appendix E

# Phase I Environmental Site Assessment

Gaddy Rentals, LLC - Dalton Warehouse Building  
442 North Hamilton Street  
Dalton, Whitfield County, Georgia

April 2, 2012

**Terracon** Project No. 49127003-2



Prepared for:



Carrollton, Georgia

Prepared by:

Terracon Consultants, Inc.

Duluth, Georgia

Offices Nationwide  
Employee-Owned

Established in 1965  
terracon.com

# Terracon

Geotechnical ■ Environmental ■ Construction Materials ■ Facilities

April 2, 2012



CertusBank  
100 Tom Reeves Drive  
Carrollton, Georgia 30117

Attn: Mr. Jason Templeton, Senior Vice President  
Senior Commercial Assets Manager  
P: (678) 839-6728

Re: Phase I Environmental Site Assessment  
Gaddy Rentals, LLC - Dalton Warehouse Building  
442 North Hamilton Street  
Dalton, Whitfield County, Georgia  
**Terracon** Project No. 49127003-2

Dear Mr. Templeton:

Terracon Consultants, Inc. (Terracon) is pleased to submit the enclosed Phase I Environmental Site Assessment report for the above-referenced site. This assessment was performed in accordance with the Terracon Proposal P49110901, dated December 27, 2011.

We appreciate the opportunity to be of service to you on this project. In addition to Phase I services, our professionals provide geotechnical, environmental, construction materials, and facilities services on a wide variety of projects locally, regionally and nationally. For more detailed information on all of Terracon's services please visit our website at <http://www.terracon.com>. If there are any questions regarding this report or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,

**Terracon Consultants, Inc.**

Brian P. Rohr  
Staff Environmental Scientist

John A. Meadow  
Principal / Environmental Division

Terracon Consultants Inc, 2855 Premiere Pkwy, Suite C Duluth, GA 30097  
P [770] 623-0755 F [770] 623-9628

Geotechnical



Environmental



Construction Materials



Facilities

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## Common Acronyms<sup>1</sup>

ACM	Asbestos containing material
AST	Aboveground storage tank
ASTM	American Society for Testing and Materials
AUL	Activity and use limitation
BGS	Below ground surface
BTEX	Benzene, toluene, ethylbenzene, and xylenes
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
DOT	United States Department of Transportation
EPA	United States Environmental Protection Agency
HREC	Historical recognized environmental condition
LUST	Leaking underground storage tank
MCL	Maximum contaminant level
MSDS	Material safety data sheet
NGVD	National Geodetic Vertical Datum
NOV	Notice of Violation
NPL	National Priority List
NRCS	USDA Natural Resources Conservation Service
OSHA	Occupational Safety and Health Administration
PCB	Poly-chlorinated biphenyl
RCRA	Resource Conservation and Recovery Act
REC	Recognized environmental condition
SPCC	Spill Prevention, Control and Countermeasure
SWPPP	Stormwater pollution prevention plan
TEPH	Total extractable petroleum hydrocarbons
TPH	Total petroleum hydrocarbons
TVPH	Total volatile petroleum hydrocarbons
TRI	Toxic release inventory
TSCA	Toxic Substances Control Act
USGS	United States Geological Survey
UST	Underground storage tank
VCP	Voluntary cleanup program
VOC	Volatile organic compound

### Units of measure

sq ft or ft <sup>2</sup>	square feet
mg/kg	milligrams per kilogram
mg/l	milligrams per liter
ug/l	micrograms per liter
ppb	parts per billion
ppm	parts per million

<sup>1</sup> An additional list of acronyms and definitions is included in Appendix B.

**PHASE I ENVIRONMENTAL SITE ASSESSMENT  
GADDY RENTALS, LLC  
DALTON WAREHOUSE BUILDING  
442 NORTH HAMILTON STREET  
DALTON, WHITFIELD COUNTY, GEORGIA**

**Terracon** Project No. 49127003-2  
April 2, 2012

**EXECUTIVE SUMMARY**

This Phase I Environmental Site Assessment (ESA) was performed in accordance with Terracon Proposal No. P49110901, dated December 27, 2011 and consistent with the procedures included in ASTM E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. The ESA was conducted under the supervision or responsible charge of Mr. John A. Meadow, Environmental Professional. Mr. Brian P. Rohr performed the site reconnaissance on March 14, 2012. Terracon understands this report was requested due to the potential foreclosure of the site.

A cursory summary of findings is provided below. It should be recognized that details were not included or fully developed in this section, and the report must be read in its entirety for a comprehensive understanding of the items contained herein.

- The site (Parcel No. 12-200-21-003) consists of an approximate 2.73 acre parcel of land developed with an approximate 54,448 square-foot vacant commercial warehouse building located at 442 North Hamilton Street in Dalton, Whitfield County, Georgia.
- Based on a review of the historical resources, the site has been developed land from the present-day back to approximately 1914. From approximately 1914 until the late 1940s, the site was developed as a residential property. The site was developed as a bedspread manufacturing plant (*National Chenille Products Company*) as early as 1950. Since the 1950s, the site has been utilized as a manufacturing and distribution site for various entities in the carpet, textile, and tufting industries. Additionally, it was determined that a portion of the site building has been utilized since the late 1990s by an industrial supply company who was reported to have operated repair and paint services until approximately 2011 when the building was vacated by both the owner (*Harbour Carpet Mills Inc.*) and the associated tenant (*A1- Industrial Supplies Inc.*). At the time of the site reconnaissance, the site building was vacant.
- The site is adjoined by a large warehouse to the north, railroad tracks to the east, a vacant land lot followed by a small vacant building to the south; and, North Hamilton Street followed by residential properties to the northwest and commercial buildings to the southwest.

- The site is not listed in the environmental regulatory database report. The environmental regulatory database report identified several facilities within the specified search radii of the site.

The Southern Oil Co. facility was listed in the environmental regulatory database report as an underground storage tank (UST) and leaking underground storage tank (LUST) facility. The facility is located at 428 North Hamilton Street, which is located approximately 300 feet south of the site building, but is adjacent to the paved driveway which is a part of the site extending south from the area developed with the site building. From regulatory information gathered, the facility was reportedly used to store and distribute petroleum products from the 1950s until approximately the late 1970s.

According to the regulatory database, a suspected release notification was received March 4, 1992, and a confirmed release report was received December 30, 1993 by the Georgia Environmental Protection Division (GA EPD). The site received a No Further Action Required (NFAR) from the GA EPD on September 4, 1998 as analytical results had revealed that the dissolved-phase hydrocarbons were limited to the vicinity of the former UST pit at the facility, and furthermore, were limited to the west of the pit. Two groundwater monitoring wells were installed during the site investigation between the former UST pit at the facility and the site. Between November 1995 and June 1998, no detectable concentrations of petroleum constituents were identified in groundwater samples taken. Based upon non-detect samples collected between the petroleum source and the site, the former facility does not constitute a recognized environmental condition (REC) to the site.

Based on facility characteristics, distance, and topographic gradient in relation to the site, the remaining listed regulated facilities do not constitute a REC associated with the site.

**Based on the scope of services, limitations, and findings of this assessment, Terracon identified the following RECs associated with the site, which warrants additional investigation:**

- There is potential for soil and groundwater impairment at the site as a result of the operations conducted by historical site occupants, which have included multiple carpet/textile manufacturers and an apparent auto/industrial equipment repair shop (which apparently utilized a variety of petroleum products and was reported to have performed paint operations involving solvents).
- There is potential for groundwater impairment at the site as a result of the historical manufacturing/textile operations performed for approximately 50 years on the northern adjacent property. *Brooker Spread Co.* (bedspread manufacturer) operated at the northern adjacent site from approximately 1950 until the 1980s (30 years), and additional carpet manufacturing is believed to have been performed until approximately 2000.



**Terracon recommends additional investigation to assess local soil and groundwater quality conditions as a result of the above-named RECs.**

**Although not identified as a REC to the site, Terracon observed numerous 5-gallon buckets and 55-gallon drums which appeared to contain used and/or new automotive fluids and/or related substances. Terracon recommends characterizing and properly disposing of said substances.**

**PHASE I ENVIRONMENTAL SITE ASSESSMENT  
DALTON WAREHOUSE BUILDING  
442 NORTH HAMILTON STREET  
DALTON, WHITFIELD COUNTY, GEORGIA**

**Terracon** Project No. 49127003-2  
April 2, 2012

## 1.0 INTRODUCTION

### 1.1 Site Description

<b>Site Name</b>	Dalton Warehouse Building
<b>Site Location/Address</b>	442 North Hamilton Street, Dalton, Whitfield County, Georgia
<b>Land Area</b>	Approximately 2.73-acres
<b>Site Improvements</b>	The site is improved with an approximate 54,448 square-foot commercial warehouse building, and paved driveway and parking areas.

The site location is depicted on Figure 1 of Appendix A, which was reproduced from a portion of the United State Geological Survey (USGS) 7.5-minute series topographic map. A diagram of the site and adjoining properties is included as Figure 2 in Appendix A. Acronyms and terms used in this report are described in Appendix B.

### 1.2 Scope of Services

This Phase I Environmental Site Assessment (ESA) was performed in accordance with Terracon Proposal No. P49110901, dated December 27, 2011 and consistent with the procedures included in ASTM E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. The purpose of this ESA was to assist the client in developing information to identify recognized environmental conditions (RECs) in connection with the site as reflected by the scope of this report. This purpose was undertaken through user-provided information, a regulatory database review, historical and physical records review, interviews, including local government inquiries, as applicable, and a visual noninvasive reconnaissance of the site and adjoining properties. Limitations, ASTM deviations, and significant gaps (if identified) are evident from reviewing the applicable scope of services and the report text.

### 1.3 Standard of Care

This ESA was performed in accordance with generally accepted practices of this profession, undertaken in similar studies at the same time and in the same geographical area. We have endeavored to meet this standard of care, but may be limited by conditions encountered during performance, a client-driven scope of work, or inability to review information not received by the report date. When appropriate, these limitations are discussed in the text of the report, and an evaluation of their significance with respect to our findings has been conducted.

Phase I ESAs, such as the one performed at this site, are of limited scope, are noninvasive and cannot eliminate the potential that hazardous, toxic, or petroleum substances are present or have been released at the site beyond what is identified by the limited scope of this ESA. In conducting the limited scope of services described herein, certain sources of information and public records were not reviewed. It should be recognized that environmental concerns may be documented in public records that were not reviewed. No ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs. No warranties, express or implied, are intended or made. The limitations herein must be considered when the user of this report formulates opinions as to risks associated with the site or otherwise uses the report for any other purpose. These risks may be further evaluated - but not eliminated - through additional research or assessment. We will, upon request, advise you of additional research or assessment options that may be available and associated costs.

#### **1.4 Additional Scope Limitations, ASTM Deviations and Significant Data Gaps**

Based upon the agreed-on scope of services, this ESA did not include subsurface or other invasive assessments, business environmental risk evaluations, or other services not particularly identified and discussed herein. Reasonable attempts were made to obtain information within the scope and time constraints set forth by the client; however, in some instances, information requested is not, or was not, received by the issuance date of the report. Consideration of such information is beyond the scope of this assessment. Information obtained for this ESA was received from several sources that we believe to be reliable; nonetheless, the authenticity or reliability of these sources cannot and is not warranted hereunder.

An evaluation of the significance of these limitations and missing information with respect to our findings has been conducted, and where appropriate, significant data gaps are identified and discussed in the text of the report. However, it should be recognized that an evaluation of significant data gaps is based on the information available at the time of report issuance, and an evaluation of information received after the report issuance date may result in an alteration of our conclusions, recommendations, or opinions. We have no obligation to provide information obtained or discovered by us after the issuance date of the report, or to perform any additional services, regardless of whether the information would affect any conclusions, recommendations, or opinions in the report. This disclaimer specifically applies to any information that has not been provided by the client.

This report represents our service to you as of the report date and constitutes our final document; its text may not be altered after final issuance. Findings in this report are based upon the site's current utilization, information derived from the most recent reconnaissance and from other activities described herein; such information is subject to change. Certain indicators of the presence of hazardous substances or petroleum products may have been latent, inaccessible, unobservable, or not present during the most recent reconnaissance

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and may subsequently become observable (such as after site renovation or development). Further, these services are not to be construed as legal interpretation or advice.

**1.5 Reliance**

This ESA report is prepared for the exclusive use and reliance of CertusBank. Use or reliance by any other party is prohibited without the written authorization of CertusBank and Terracon Consultants, Inc. (Terracon).

Reliance on the ESA by the client and all authorized parties will be subject to the terms, conditions and limitations stated in the proposal, ESA report, and the Agreement for Consulting Services. The limitation of liability defined in the Agreement for Consulting Services is the aggregate limit of Terracon’s liability to the client and all relying parties.

Continued viability of this report is subject to ASTM E 1527-05 Sections 4.6 and 4.8. If the ESA will be used by a different user (third party) than the user for whom the ESA was originally prepared, the third party must also satisfy the user’s responsibilities in Section 6 of ASTM E 1527-05.

**1.6 Client Provided Information**

Prior to the Terracon site reconnaissance, Mr. Templeton, client’s representative, reported that he is not aware of specialized knowledge or experience that is material to RECs in connection with the site; he reportedly does not have actual knowledge of environmental liens or AULs encumbering the site or in connection with the site; he reported that the purchase price being paid for the site is not applicable as the site is currently in foreclosure; he reportedly is not aware of commonly known or reasonably ascertainable information within the local community about the site that is material to RECs in connection with the site; and, he is unaware of the presence or likely presence of contamination at the site.

**2.0 PHYSICAL SETTING**

PHYSICAL SETTING INFORMATION FOR SITE AND SURROUNDING AREA		SOURCE
<b>Topography</b> (Refer to Appendix A for an excerpt of the Topographic Map)		
<i>Site Elevation</i>	Approximately 750 feet National Geodetic Vertical Datum (NGVD).	USGS Topographic Map, Dalton North, Georgia dated 1985.
<i>Surface Runoff/ Topographic Gradient</i>	The topography is generally flat; however, the general topographic gradient is toward the east-southeast.	
<i>Closest Surface Water</i>	The Little Satilla River is located approximately 275 feet north of the site.	

Soil Characteristics		
Dominant Soil Type	Urban Land	Environmental Data Resources, Inc. (EDR), Geotcheck – Physical Setting Source Summary, dated January 5, 2012.
Description	This map unit consists of areas where more than 85 percent of the surface is covered by asphalt, concrete, buildings, or other imperious surfaces. Examination and identification of soils or soil material in this map unit are impractical. Onsite investigation is needed to determine the specific potential and limitations for any proposed use.	
Geology/Hydrogeology		
Era, System, Series	Paleozoic, Cambrian, Cambrian	EDR Geotcheck – Physical Setting Source Summary, dated January 5, 2012.
Category	Stratified sequence	
Estimated depth to First Occurrence of Groundwater	Less than 10 feet below grade surface (bgs).	USGS Topographic Map, Dalton North, Georgia dated 1985.
*Hydrogeologic Gradient:	Anticipated to be parallel to topographic gradient (generally toward the east-southeast).	
Primary Aquifer	Surficial aquifer	Groundwater Atlas of the US, Segment 6; USGS; dated 1995.

\* The groundwater flow direction and the depth to shallow, unconfined groundwater, if present, would likely vary depending upon seasonal variations in rainfall and other hydrogeological features. Without the benefit of on-site groundwater monitoring wells surveyed to a datum, groundwater depth and flow direction beneath the site cannot be directly ascertained.

### 3.0 HISTORICAL USE INFORMATION

Terracon reviewed the following historical sources for indications of RECs. A summary of the historical review is included at the end of this section. Copies of selected historical documents are included in Appendix C.

#### 3.1 Historical Topographic Maps

The readily available historical USGS topographic map was reviewed to identify land use in connection with the site. The reviewed historical topographic map is summarized below.

■ Dalton North, Georgia, published 1985 (1" = 2,000')

Direction	Description
Site	The site and surrounding areas are shaded to indicate areas of dense urban development (1985).
North	
East	
South	
West	

### 3.2 Historical Aerial Photographs

Selected historical aerial photographs from EDR were reviewed at approximately 10 to 15 year intervals, if readily available, to obtain information associated with the history of development on and near the site. Evaluation of these aerials may be limited by a photo's quality and scale. Selected photographs are summarized below.

- 1938, 1" = 476'
- 1950, 1" = 476'
- 1955, 1" = 476'
- 1960, 1" = 476'
- 1972, 1" = 476'
- 1988, 1" = 950'
- 1993, 1" = 500'
- 2005, 1" = 500'
- 2006, 1" = 500'
- 2007, 1" = 500'

Direction	Description
Site	Depicted as developed with residential structures (1938). Depicted as developed with the original portion of the manufacturing warehouse and two residences located to the immediate west on the property (1950-1955). Depicted with the original structure (1960). Depicted as developed with the present-day structure on site (1972-2007).
North	Residential properties (1938). Developed with an apparent large manufacturing building (1950). Additions have been added to the northern adjacent manufacturing building (1955-1960). The northern adjacent property appears developed as observed during the site visit (1970-2007).
East	Railroad tracks followed by an apparent lumber yard and associated buildings (1938). Railroad tracks followed by two apparent lumber manufacturing yards (1950-1988). Railroad tracks followed by various commercial properties as observed during the site visit (1993-2007).
South	Apparent residential properties (1938-1950). A mixture of residential and commercial properties (1955-1960). Apparent commercial properties have been developed (1972). Various commercial properties are developed (1988-2007).
West	North Hamilton Street followed by apparent residential properties (1938-1960). North Hamilton Street followed by a mixture of commercial, residential, and apparent industrial properties (1972-1993). North Hamilton Street followed by a mixture of residential and commercial properties as observed during the site visit (2005-2007).

### 3.3 Historical City Directories

The historical city directories used in this study were made available through the Dalton-Whitfield County Public Library (selected years reviewed: 1952 through 2007) and were

reviewed at approximate five year intervals, if readily available. Since these references are copyright protected, reproductions are not provided in this report. The address identified as associated with the site in the historical city directories is 442 North Hamilton Street; however, prior to 1989, it appears that the site address was 444 North Hamilton Street, which could have been associated with the original structure of the site building. Additionally, it was noted that two residential dwellings were located to the immediate west of the site building in early aerial photos, which corresponds with the residential listings associated with 444 North Hamilton Street in 1952-1957, while 442 North Hamilton Street is listed as the original carpet manufacturer at the site. Both listings will be referred to as the site in this section.

Direction	Description
Site	<p><b>442 North Hamilton Street:</b> <u>Harbor Carpet Mills Corp.</u>, <u>A-1 Industrial Supplies Inc.</u> (2007). <u>Harbor Carpet Mills Corp.</u>, <u>A-1 Industrial Supplies Inc.</u>, <u>Apex Samples Inc.</u> (2002). <u>A-1 Industrial Supplies Inc.</u>, <u>Apex Samples Inc.</u> (1997). <u>Apex Samples Inc.</u> (1992). No street listings (1987-1962). <u>Bates Industries Inc.</u> (tufted textile) (1957). <u>National Chenille Products Co</u> (1952).</p> <p><b>444 North Hamilton Street:</b> <u>Twin Tex Corporation</u> (1997). <u>Twin Tex Carpet</u>, <u>Georgia Commercial Carpet Building</u> (1992-1987). <u>Georgia Commercial Carpet Building</u>, <u>Deitch Stewart Co.</u> (carpet mfg.), <u>One East International Exporters</u> (1982). <u>Tuf-Braid</u>, <u>North Georgia Freight Bureau</u>, <u>Bock Industries</u> (1977). <u>Vacant</u> (1972). <u>Crown Tuft Carpet Inc.</u> (1967-1962). <u>Residential</u> (1957-1952).</p>
North	<p><b>110 East Tyler Street:</b> <u>Right on Track (carpet dist.)</u> (2007). No street listing (2002). <u>Westmark Carpets</u> (1997). <u>Whitfield Co.</u> (1992). <u>Providence Rug Co.</u> (1987). <u>Brooker Spread Co. Inc.</u> (1982-1952).</p>
East	<p><b>501 Maiden Lane:</b> No street listing (2007-2002). <u>Patterson Sandblasting</u> (1997). <u>Patterson Sandblasting/Trailer Leasing</u> (1992). <u>Dixie Building Supply Co</u> (1967).</p>
South	<p><b>428 North Hamilton Street:</b> <u>Luffman &amp; Associates</u> (2007-2002). No street listing (1992). <u>Vacant</u> (1987). <u>Collins Super Oil Co.</u> (1982). <u>Southern Oil Co.</u> (1977-1957). No street listing (1952).</p>
West	<p><b>437 North Hamilton Street:</b> <u>All Chem. Inc.</u> (2007). <u>All Chem. Inc.</u>, <u>Chemical Connection</u> (2002). <u>All Chem.</u>, <u>Tasco Yarn</u>, <u>Chemical Connection</u> (1997-1992). <u>Georgia Commercial Carpet Manufacturers</u> (1987). <u>Commercial Contract Tufting Inc.</u> (1982). <u>Clements Carpet Mills</u> (1977). <u>Barrett Carpet Mills</u> (1972). No street listings (1967-1952).</p> <p><b>441 North Hamilton Street:</b> <u>JAA Controls</u> (2007). <u>Controls and Drives, Inc.</u> (2002). <u>Henderson Industrial Equipment</u> (1997-1972). <u>Henderson Industrial</u>, <u>Holt Textiles Sales Co.</u>, <u>Whitfield County Farm Bureau</u> (1967-1962). <u>Residential</u> (1957-1952).</p>

Numerous manufacturing entities are identified in the historical city directories as former site occupants. Each of these facilities conducted industrial repair and/or textile manufacturing associated with the tufting and carpet industries. Such operations typically involve the use of petroleum-based and/or chlorinated solvents. The combined tenure of operations at the site for these former facilities is approximately 60 years. The carpet and textile manufacturing operations over this period constitutes a REC to the site.

Additionally, the northern adjacent property (110 East Tyler Street) is identified as an industrial manufacturing facility which has been associated with the carpet and textile industry since the early 1950s. The northern adjacent property shares a common wall with the northern end of the site building. The manufacturing operations of this off-site facility over the past 60 years constitute a REC to the site.

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Please see Section 4.1 for information regarding Southern Oil Co. formerly located at 428 North Hamilton Street.

The facilities identified to the west of the site are located across North Hamilton Street and based upon aerial photos and observation of the surrounding areas during the site reconnaissance are located topographically cross-gradient of the site. Based upon relative distance from the site, the properties identified to the west do not constitute RECs to the site.

### 3.4 Historical Fire Insurance Maps

Historical fire insurance maps produced by the Sanborn Map Company were requested from EDR to evaluate past uses and relevant characteristics of the site and surrounding properties. EDR provided Sanborn fire insurance maps dated 1897, 1903, 1908, 1914, 1925, 1941, 1950, 1960, and 1963.

Direction	Description
Site	<u>Carpet Manufacturer</u> , residential dwelling (1963, 1960). <u>National Chenilles Co. Manufacturing Bedspreads</u> , two residences to the west (1950). Residential (1941-1914). Not pictured (1908-1897).
North	<u>Brooker Spread Co. Manufacturing Bedspreads</u> (1963-1914). Undeveloped (1908-1897).
East	Railroad tracks followed by <u>Dixie Building &amp; Supply Co.</u> (1963-1960). Railroad followed by <u>multiple lumber yards and associated buildings, kilns, etc.</u> (1950-1914). Railroad followed by woodworking operation (1908-1897).
South	Residential (1963-1914). Not pictured (1908-1897).
West	North Hamilton Street followed by residential properties (1963-1914). Not pictured (1908-1897).

The site has been occupied by various carpet, tuft, and textile manufacturing operations from approximately 2010 back to at least 1950. Historical site operations which may have included yarn dyeing, carpet dyeing, the extensive use of adhesives and solvents constitutes a REC associated with the site.

A historical bedspread manufacturing facility (1914 through 1963) located immediately to the north of the site represents a REC to the site.

### 3.5 Property Tax File Information

According to the Whitfield County Tax Assessor, the site consists of an approximate 2.73 acres of land (Parcel No. 12-200-21-003) located at 442 North Hamilton Street, owned by Gaddy Rentals, LLC.

### 3.6 Title Search

At the direction of the client, a title search was not included as part of the scope of services. Unless notified otherwise, we assume that the client is evaluating this information outside the scope of this report.

### 3.7 Environmental Liens

Environmental lien records recorded against the site were not provided by the client. At the direction of the client, performance of a review of these records was not included as part of the scope of services and unless notified otherwise, we assume that the client is evaluating this information outside the scope of this report.

### 3.8 Building Department Records

Terracon contacted the City of Dalton Building Inspection Department (CDBID) via telephone at (706) 876-2530 for building permit information as related to environmental concerns associated with the site. According to CDBID personnel, building department records for the site as related to environmental concerns are not available.

### 3.9 Zoning/Land Use Records

According to the Whitfield County Tax assessor, the site is zoned as M-2, Industrial General.

### 3.10 Historical Interviews

The following individual was interviewed regarding historical use of the site.

<u>Interviewer</u>	<u>Interviewee</u>	<u>Title</u>	<u>Date</u>
Mr. Brian P. Rohr	Mr. David Gaddy (706) 463-5026	Site Owner	March 9, 2012

Mr. David Gaddy (site owner) reported the following:

- He has owned the site since the late 1990s (approximately 1998).
- From the time of purchase until the operations moved in 2011, Harbor Carpet Mills Corporation has operated as a carpet manufacturer and distributor at the site. The site utilizes electric energy to power machinery and gas to power the internal heating within the warehouse.
- In addition to Harbor Carpet Mills Corp., an industrial supply and equipment repair company, A-1 Industrial Supplies Inc., has leased the approximately 10,000 square-foot section of the building located in the northeast corner.
- Historically the site has been utilized by carpet and tufting manufacturers.

☒ He is not aware of any underground storage tanks located at the site.

He is not aware of environmental issues associated with the site and indicated that no prior Phase I ESA was performed at the site prior to purchase.

### **3.11 Prior Report Review**

No prior environmental reports were provided to Terracon for review.

### **3.12 Historical Use Information Summary**

Based on a review of the historical resources, the site has been developed land from the present-day back to approximately 1914. From approximately 1914 until the late 1940s, the site was developed as a residential property. The site was developed as a bedspread manufacturing plant (*National Chenille Products Company*) as early as 1950. Since the 1950s, the site has been utilized as a manufacturing and distribution site for various entities in the carpet, textile, and tufting industries. Additionally, it was determined that a portion of the site building has been utilized since the late 1990s by an industrial supply company who was reported to have operated repair and paint services until approximately 2011 when the building was vacated by both the owner (*Habour Carpet Mills Inc.*) and the associated tenant (*A1- Industrial Supplies Inc.*). At the time of the site reconnaissance, the site building was vacant.

## **4.0 RECORDS REVIEW**

Regulatory database information was provided by EDR, a contract information services company. The purpose of the records review was to identify RECs in connection with the site. Evaluating identified regulatory facilities for potential vapor intrusion conditions was outside the scope of this assessment. Information in this section is subject to the accuracy of the data provided by the information services company and the date at which the information is updated, and the scope herein did not include confirmation of facilities listed as "unmappable" by regulatory databases.

In some of the following subsections, the words up-gradient, cross-gradient and down-gradient refer to the topographic gradient in relation to the site. As stated previously, the groundwater flow direction and the depth to shallow groundwater, if present, would likely vary depending upon seasonal variations in rainfall and the depth to the soil/bedrock interface. Without the benefit of on-site groundwater monitoring wells surveyed to a datum, groundwater depth and flow direction beneath the site cannot be directly ascertained.

### **4.1 Federal and State/Tribal Databases**

Listed below are the facility listings identified on federal and state/tribal databases within the ASTM-required search distances from the approximate site boundaries. In addition to the

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ASTM-required listings, Terracon reviewed other federal, state, local and proprietary databases provided by the database firm. Database definition, descriptions, and the database search report are included in Appendix D.

Database	Description	Radius (Miles)	Listings
<u>Federal</u>			
<b>NPL</b>	The NPL is the EPA's database of uncontrolled or abandoned hazardous waste facilities that have been listed for priority remedial actions under the Superfund Program.	1.0	0
<b>NPL (Delisted)</b>	The NPL (Delisted) refers to facilities that have been removed from the NPL.	0.5	0
<b>CERCLIS</b>	The CERCLIS database is a compilation of facilities which the EPA has investigated or is currently investigating for a release or threatened release of hazardous substances pursuant to the CERCLA of 1980.	0.5	1
<b>CERCLIS/NFRAP</b>	CERCLIS/NFRAP refers to facilities that have been removed and archived from EPA's inventory of CERCLA sites.	0.5	0
<b>RCRA CORRACTS/TSD</b>	The EPA maintains a database of RCRA facilities associated with treatment, storage, and disposal (TSD) of hazardous waste that are undergoing "corrective action." A "corrective action" order is issued when there has been a release of hazardous waste or constituents into the environment from a RCRA facility.	1.0	0
<b>RCRA Non-CORRACTS/TSD</b>	The RCRA Non-CORRACTS/TSD Database is a compilation by the USEPA of facilities which report storage, transportation, treatment, or disposal of hazardous waste. Unlike the RCRA CORRACTS/TSD database, the RCRA Non-CORRACTS/TSD database does not include RCRA facilities where corrective action is required.	0.5	0
<b>RCRA Generators</b>	The RCRA Generators database, maintained by the EPA, lists facilities that generate hazardous waste as part of their normal business practices. Generators are listed as either large (LQG), small (SQG), or conditionally exempt (CESQG). LQG produce at least 1000 kg/month of non-acutely hazardous waste or 1 kg/month of acutely hazardous waste. SQG produce 100-1000 kg/month of non-acutely hazardous waste. CESQG are those that generate less than 100 kg/month of non-acutely hazardous waste.	0.25	0
<b>IC / EC</b>	A listing of sites with institutional and/or engineering controls in place. IC include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls. EC include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.	Site	0
<b>ERNS</b>	The Emergency Response Notification System (ERNS) is a listing compiled by the EPA on reported releases of petroleum and hazardous substances to the air, soil and/or water.	Site	0

State/Tribal			
<b>SHWS</b>	The Georgia Environmental Protection Division (GEPD) identifies state equivalent CERCLIS Hazardous Site Inventory (HSI) where there has been a known or suspected release of a regulated substance above a reportable quantity and which have yet to show they meet state clean-up standards found in the Rules for Hazardous Site Response.	1.0	1
<b>Non-HSI</b>	Property listings that have reported contamination of soil or groundwater under the Georgia Hazardous Site Response Act (HSRA). These sites were not placed on the Georgia Priority list (HSI) because their hazard evaluation scores did not exceed the threshold levels established for sites posing an imminent threat to health or the environment.	1.0	2
<b>SWF / LF</b>	State and/or Tribal database of solid waste facilities located within Georgia. The database information may include the facility name, class, operation type, area, estimated operational life, and owner.	0.5	0
<b>LUST</b>	State and/or Tribal database of leaking underground storage tanks in state of Georgia.	0.5	10
<b>UST</b>	State and/or Tribal database of registered storage tanks in the State of Georgia which may include the owner and location of the tanks.	0.25	5
<b>IC/EC</b>	State and/or Tribal equivalent to the Federal IC / EC database list	Site	0
<b>VCP</b>	State and/or Tribal facilities included as Voluntary Cleanup Program sites.	0.5	0
<b>Brownfields</b>	State and/or tribal listing of Brownfield properties addressed by Cooperative Agreement Recipients or Targeted Brownfields Assessments.	0.5	0
<b>Drycleaners</b>	A list of regulated drycleaners in the state of Georgia.	0.25	1
<b>RCRA-NonGen</b>	A list of facilities historically listed as RCRA generators.	0.25	0

The site is not listed in the environmental regulatory database report. The environmental regulatory database reported several regulated facilities within the specified search radii of the site.

Southern Oil Co. (Former)

The Southern Oil Co. facility was listed in the environmental regulatory database report as a UST and LUST facility. The facility is located at 428 North Hamilton Street, which is located approximately 300 feet south of the site building, but is adjacent to the paved driveway which is a part of the site extending south from the area developed with the site building. From regulatory information gathered, the facility was reportedly used to store and distribute petroleum products from the 1950s until approximately the late 1970s.

According to the regulatory database, a suspected release notification was received March 4, 1992, and a confirmed release report was received December 30, 1993 by the Georgia Environmental Protection Division (GA EPD). The site received a No Further Action Required (NFAR) from the GA EPD on September 4, 1998 as analytical results had revealed that the dissolved-phase hydrocarbons were limited to the vicinity of the former

UST pit at the facility, and furthermore, were limited to the west of the pit. Two groundwater monitoring wells were installed during the site investigation between the former UST pit at the facility and the site. Between November 1995 and June 1998, no detectable concentrations of petroleum constituents were identified in groundwater samples taken. Based upon non-detect samples collected between the petroleum source and the site, the former facility does not constitute a REC to the site.

Unmapped facilities are those that do not contain sufficient address or location information to evaluate the facility listing locations relative to the site. The report listed 20 facilities in the unmapped section. Determining the location of unmapped facilities is beyond the scope of this assessment; however, none of these facilities were identified as the site. These facilities are listed in the database report in Appendix D.

## **4.2 Local Agency Inquiries**

### **4.2.1 Health Department/Environmental Division**

The Whitfield County Environmental Health Department (WCEHD) was contacted via telephone at (706) 272-2005 on March 13, 2012 regarding records of septic permits or information indicating potential environmental concerns associated with the site. According to WCEHD personnel, WCEHD has no records of septic permits or environmental issues associated with the site. WCEHD personnel reported that the site is connected to municipal drinking and wastewater services.

### **4.2.2 Fire Department**

The City of Dalton Fire Department (CDFD) was contacted via telephone at (706) 278-7363 on March 13, 2012 regarding records of emergency responses or information indicating potential environmental concerns associated with the site. According to CCFD personnel, CCFD has no records pertaining to potential environmental concerns associated with the site.

## **4.3 Records Review Summary**

The site is not listed in the environmental regulatory database report. The environmental regulatory database report identified several facilities within the specified search radii of the site.

The Southern Oil Co. facility was listed in the environmental regulatory database report as a UST and LUST facility. The facility is located at 428 North Hamilton Street, which is located approximately 300 feet south of the site building, but is adjacent to the paved driveway which is a part of the site extending south from the area developed with the site building. From regulatory information gathered, the facility was reportedly used to store and distribute petroleum products from the 1950s until approximately the late 1970s.

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According to the regulatory database, a suspected release notification was received March 4, 1992, and a confirmed release report was received December 30, 1993 by the GA EPD. The site received a NFAR from the GA EPD on September 4, 1998 as analytical results had revealed that the dissolved-phase hydrocarbons were limited to the vicinity of the former UST pit at the facility, and furthermore, were limited to the west of the pit. Two groundwater monitoring wells were installed during the site investigation between the former UST pit at the facility and the site. Between November 1995 and June 1998, no detectable concentrations of petroleum constituents were identified in groundwater samples taken. Based upon non-detect samples collected between the petroleum source and the site, the former facility does not constitute a REC to the site.

Based on facility characteristics, distance, and topographic gradient in relation to the site, the remaining listed regulated facilities do not constitute a REC associated with the site.

### 5.0 SITE RECONNAISSANCE

#### 5.1 General Site Information

Information contained in this section is based on a visual reconnaissance conducted while walking through the site and the accessible interior areas of structures, if any, located on the site. Figure 2 in Appendix A is a diagram of the site. Photo documentation of the site at the time of the visual reconnaissance is provided in Appendix F. Credentials of the individuals planning and conducting the site visit are included in Appendix G.

Site Reconnaissance	
<i>Field Personnel</i>	Mr. Brian P. Rohr
<i>Reconnaissance Date</i>	March 26, 2012
<i>Weather Conditions</i>	Sunny, 60s
<i>Site Contact</i>	Mr. Lowell (Maintenance Manager)
Site Description	
<i>Site Name</i>	Dalton Warehouse Building
<i>Site Location/Address</i>	442 North Hamilton Street, Dalton, Whitfield County, Georgia
<i>Land Area</i>	Approximately 2.73 acres
<i>Site Improvements</i>	The site is improved with an approximate 54,448 square-foot commercial warehouse building, and paved driveway and parking areas.
<i>Zoning</i>	M2 - Industrial General
<i>Site Topographic Relief</i>	Generally toward the east-southeast

Site Utilities	
Electricity	Dalton Utilities and City of Dalton Public Works
Drinking Water	
Natural Gas	
Sewer	

## 5.2 General Description of Site, Occupants, and Operations

The site (Parcel No. 12-200-21-003) consists of an approximate 2.73 acres of land developed with an approximate 54,448 square-foot vacant commercial warehouse building located at 442 North Hamilton Street in Dalton, Whitfield County, Georgia. Previous occupants of the site have been a variety of carpet/textile manufacturing companies, and an industrial equipment repair facility (tenant which was located in the eastern portion of the building).

## 5.3 Site Observations

The following table summarizes site observations and interviews. Affirmative responses (designated by an "X") are discussed in more detail following the table.

Category	Item or Feature	Observed
<b>Site Operations, Processes, and Equipment</b>	Emergency generators	
	Elevators	
	Air compressors	
	Hydraulic lifts	
	Dry cleaning	
	Photo processing	
	Laboratory hoods and/or incinerators	
	Waste treatment systems and/or water treatment systems	
	Heating and/or cooling systems	X
	Other processes or equipment	
<b>Aboveground Chemical or Waste Storage</b>	Aboveground storage tanks	
	Drums, barrels and/or containers ≥ 5 gallons	X
	Material and Safety Data Sheet (MSDS)	
<b>Underground Chemical or Waste Storage, Drainage or Collection Systems</b>	Underground storage tanks or ancillary UST equipment	
	Sumps, cisterns, catch basins and/or dry wells	
	Grease traps	
	Septic tanks and/or leach fields	
	Oil/water separators	
	Pipeline markers	
	Interior floor drains	X
<b>Electrical Transformers/ PCBs</b>	Pad or pole mounted transformers and/or capacitors	
	Other equipment	
<b>Releases or Potential Releases</b>	Stressed vegetation	
	Stained soil	
	Stained pavement or similar surface	X
	Leachate and/or waste seeps	

Category	Item or Feature	Observed
<b>Releases or Potential Releases</b>	Trash, debris and/or other waste materials	X
	Dumping or disposal areas	
	Construction/demolition debris and/or dumped fill dirt	
	Surface water discoloration, odor, sheen, and/or free floating product	
	Strong, pungent or noxious odors	
	Exterior pipe discharges and/or other effluent discharges	
<b>Other Notable Site Features</b>	Surface water bodies	X
	Quarries or pits	
	Wells	

\*\* Currently, the site building does not have power, so observations were limited in areas of the building which do not receive natural light; however, a flashlight was utilized in these areas for maximum visibility. \*\*

### Site Operations, Processes, and Equipment

#### Heating and/or cooling systems

The office building is heated and cooled by multiple central heating, ventilation, and air (HVAC) conditioning systems with internal and external components.

### Aboveground Chemical or Waste Storage

#### Drums, barrels and/or containers ≥ 5 gallons

Several drums, barrels, and containers containing a variety of petroleum products, hydraulic fluids, and various solvents were located throughout the site. Multiple 55-gallon drums were located on the central and northeast quadrant of the site, which according to information gathered, was where the manufacturing processes and industrial repair historically took place. Terracon personnel noted that multiple areas within the prior tenant-occupied (A1-Industrial Supplies Inc.) area contained collections of several (10 to 12) buckets or barrels labeled as hydraulic fluid, waste oil, or were unlabeled and appeared to contain petroleum products. Floor staining was noted in the general vicinity of nearly all the drums and barrels, and drums located in the central room were not sealed. Furthermore, the roof on the central portion of the building was reported to have numerous leaks, apparent by the large puddles of water collected on the floor, so it is assumed that petroleum and waste materials uncovered in this area are susceptible to rainfall. The numerous drums and barrels containing petroleum waste products and solvents constitute a REC associated with the site.

## **Underground Chemical or Waste Storage, Drainage or Collection Systems**

### Interior floor drains

Interior floor drains were located throughout the site building. Terracon noted floor staining in the general vicinity of the floor drains and confirmed that the site is connected to the municipal wastewater system.

## **Releases or Potential Releases**

### Stained pavement or similar surface

Stained pavement was noted throughout the central and eastern quadrants of the site building during the site visit. The two sections of the building primarily used for storage of carpet rolls, located on the southern and western portion of the building, were constructed as an addition to the building in the 1970s. These areas had minimal staining and the concrete surface appeared to be in better condition in these areas. The central and eastern portions of the building appear to have the original concrete from construction of this section of the site which was constructed in the 1950s. These areas had extensive staining and sections of concrete which appear to have been degraded and eaten away by solvents assumed to have been utilized in the manufacturing of carpeting, textiles, and tufting products over the past 60 years. The staining in these areas was most extensive along the walls of the room, where bolts in the floor indicated that machinery was most likely situated. Staining was also noted in the areas near the 55-gallon drums of petroleum waste, and also in areas reported to have been utilized for painting associated with the industrial repair and possible automotive repair operations in the eastern quadrant of the building. The stained areas located throughout the interior of the building, indicative of solvent use associated with carpet and textile manufacturing processes constitutes a REC to the site.

### Trash, debris and/or other waste materials

Trash and debris was noted in various areas throughout the site. On the exterior, household trash was scattered throughout the grassed areas along the eastern side of the property, adjacent to the creek and railroad tracks. The upstairs area of the building, utilized as office space and partially renovated for residential living spaces, was scattered with construction debris and other household debris items. The materials did not appear to be hazardous or petroleum in nature, and do not constitute a REC to the site.

## **Other Notable Site Features**

### Surface water bodies

A creek was observed along the eastern property boundary.

#### 5.4 Interviews Conducted During Visual Reconnaissance

The following individual was interviewed regarding historical use of the site during the site reconnaissance.

<u>Interviewer</u>	<u>Interviewee</u>	<u>Title</u>	<u>Date</u>
Mr. Brian P. Rohr	Mr. Lowell	Maintenance Manager	March 14, 2012

Mr. Lowell (maintenance manager) reported the following:

- He has lived in Dalton, Georgia since the early 1970s and recalled that the site has operated in carpet manufacturing since this time.
- Mr. Lowell is employed by David Gaddy as a general maintenance employee for the site and also the rental properties owned by Mr. Gaddy in Dalton, Georgia.
- The southern and western rooms of the building were utilized for storing of carpet. The materials were delivered through the two large bay doors on the south side of the building and were stored along the southern wall of this room. Along the northern wall of this section of the building were cutting machines which sectioned the large rolls into smaller pieces. After materials were cut, they were transported to the storage warehouse along the western side of the building (immediately adjacent to North Hamilton Street).

This western quadrant of the building was utilized for storage of cut carpet sections, an antique car collection apparently owned by Mr. Gaddy. Terracon noted no concrete staining or indications of any manufacturing or historic manufacturing in this quadrant of the building.

The central portion of the building was utilized for adding yarn to the carpeting, a process called "tufting", and storing the carpet backing. It was reported that the adhesives were utilized in this area to attach carpet backing to the cut pieces. Mr. Lowell reported that the roof of this portion of the building has been patched numerous times; however, still leaks an extensive amount of water when it rains (as evidenced by the numerous puddles observed throughout the room). Mr. Lowell was unaware of the contents of a 55-gallon drum observed in the middle of the room, but noted that a 55-gallon drum located along the eastern wall of the room was waste oil.

The eastern quadrant of the building was leased by Mr. Gaddy to a company that Mr. Lowell had limited knowledge of. A-1 Industrial Supplies, Inc. operated as an industrial repair facility, but was reported to have performed painting operations in this portion of the building.

### 5.5 Site Reconnaissance Summary

The site consists of an approximate 2.73 acres of land developed with an approximate 54,448 square-foot vacant commercial warehouse building located at 442 North Hamilton Street in Dalton, Whitfield County, Georgia. At the time of the site reconnaissance, the site building was vacant. Interior floor staining was observed in the central portion and eastern portion of the site building. The interior floor staining in the central room is noted to be greatest along the walls of the room where it appears that machines associated with the manufacturing process were bolted to the concrete. Floor staining within the areas of the building where carpet backing was attached via adhesives, historic yarn dyeing and tuft manufacturing was reported to have taken place, is indicative of potential solvent use.

Additionally, multiple buckets and drums (5- to 55-gallons) containing waste oil, motor oil, hydraulic fluid, and various other petroleum products were located on the eastern end of the building which was reported to be utilized by a tenant operating as a industrial supply company from the late 1990s until the building was vacated in 2011.

Sanborn Maps associated with the site identified the northeast corner of the building as a boiler house which would have been used in the tufting industry by the original tenant (*National Chenille Products Co.*). Terracon identified floor staining and areas along the eastern wall where exhaust pipes may have vented to the exterior of the building. Floor drains were located in this area and along the northernmost wall of the building which is attached to the adjacent northern property, which historically operated as a bedspread manufacturing facility.

Based on the site observations as described herein, the operations associated with the historic manufacturing operations, and industrial equipment supply and repair facilities constitute a REC to the site.

### 6.0 ADJOINING PROPERTY RECONNAISSANCE

Visual observations of adjoining properties (from site boundaries) are summarized below.

Direction	Description
North	A commercial/industrial building
East	Railroad tracks followed by a commercial building and Maiden Lane.
South	A grassed lot followed by a small vacant building.
West	North Hamilton Street followed by residential properties with commercial and industrial properties located to the southwest.

### 7.0 ADDITIONAL SERVICES

Per the agreed scope of services as outlined in Section 13.0 of ASTM E 1527-05 (Non Scope Considerations) were not conducted.

## **8.0 FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS**

This Phase I ESA was performed in accordance with the Terracon Proposal No. P49110901, dated December 27, 2011 and conducted consistent with the procedures included in ASTM E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. The ESA was conducted under the supervision or responsible charge of Mr. John A. Meadow, Environmental Professional. Mr. Brian P. Rohr performed the site reconnaissance on March 14, 2012. Terracon understands this report was requested due to the potential foreclosure of the site.

### **8.1 Findings**

A cursory summary of findings is provided below. It should be recognized that details were not included or fully developed in this section, and the report must be read in its entirety for a comprehensive understanding of the items contained herein.

- The site (Parcel No. 12-200-21-003) consists of an approximate 2.73 acre parcel of land developed with an approximate 54,448 square-foot vacant commercial warehouse building located at 442 North Hamilton Street in Dalton, Whitfield County, Georgia.
- Based on a review of the historical resources, the site has been developed land from the present-day back to approximately 1914. From approximately 1914 until the late 1940s, the site was developed as a residential property. The site was developed as a bedspread manufacturing plant (*National Chenille Products Company*) as early as 1950. Since the 1950s, the site has been utilized as a manufacturing and distribution site for various entities in the carpet, textile, and tufting industries. Additionally, it was determined that a portion of the site building has been utilized since the late 1990s by an industrial supply company who was reported to have operated repair and paint services until approximately 2011 when the building was vacated by both the owner (*Habour Carpet Mills Inc.*) and the associated tenant (*A1- Industrial Supplies Inc.*). At the time of the site reconnaissance, the site building was vacant.
- The site is adjoined by a large warehouse to the north, railroad tracks to the east, a vacant land lot followed by a small vacant building to the south; and, North Hamilton Street followed by residential properties to the northwest and commercial buildings to the southwest.
- The site is not listed in the environmental regulatory database report. The environmental regulatory database report identified several facilities within the specified search radii of the site.

The Southern Oil Co. facility was listed in the environmental regulatory database report as a UST and LUST facility. The facility is located at 428 North Hamilton Street, which is located approximately 300 feet south of the site building, but is adjacent to the paved

driveway which is a part of the site extending south from the area developed with the site building. From regulatory information gathered, the facility was reportedly used to store and distribute petroleum products from the 1950s until approximately the late 1970s.

According to the regulatory database, a suspected release notification was received March 4, 1992, and a confirmed release report was received December 30, 1993 by the GA EPD. The site received a NFAR from the GA EPD on September 4, 1998 as analytical results had revealed that the dissolved-phase hydrocarbons were limited to the vicinity of the former UST pit at the facility, and furthermore, were limited to the west of the pit. Two groundwater monitoring wells were installed during the site investigation between the former UST pit at the facility and the site. Between November 1995 and June 1998, no detectable concentrations of petroleum constituents were identified in groundwater samples taken. Based upon non-detect samples collected between the petroleum source and the site, the former facility does not constitute a REC to the site.

Based on facility characteristics, distance, and topographic gradient in relation to the site, the remaining listed regulated facilities do not constitute a REC associated with the site.

## **8.2 Conclusions**

Based on the scope of services, limitations, and findings of this assessment, Terracon identified the following RECs associated with the site, which warrants additional investigation:

- There is potential for soil and groundwater impairment at the site as a result of the operations conducted by historical site occupants, which have included multiple carpet/textile manufacturers and an apparent auto/industrial equipment repair shop (which apparently utilized a variety of petroleum products and was reported to have performed paint operations involving solvents).
- There is potential for groundwater impairment at the site as a result of the historical manufacturing/textile operations performed for approximately 50 years on the northern adjacent property. *Brooker Spread Co.* (bedspread manufacturer) operated at the northern adjacent site from approximately 1950 until the 1980s (30 years), and additional carpet manufacturing is believed to have been performed until approximately 2000.

## **8.3 Recommendations**

Terracon recommends additional investigation to assess local soil and groundwater quality conditions as a result of the above-named RECs.

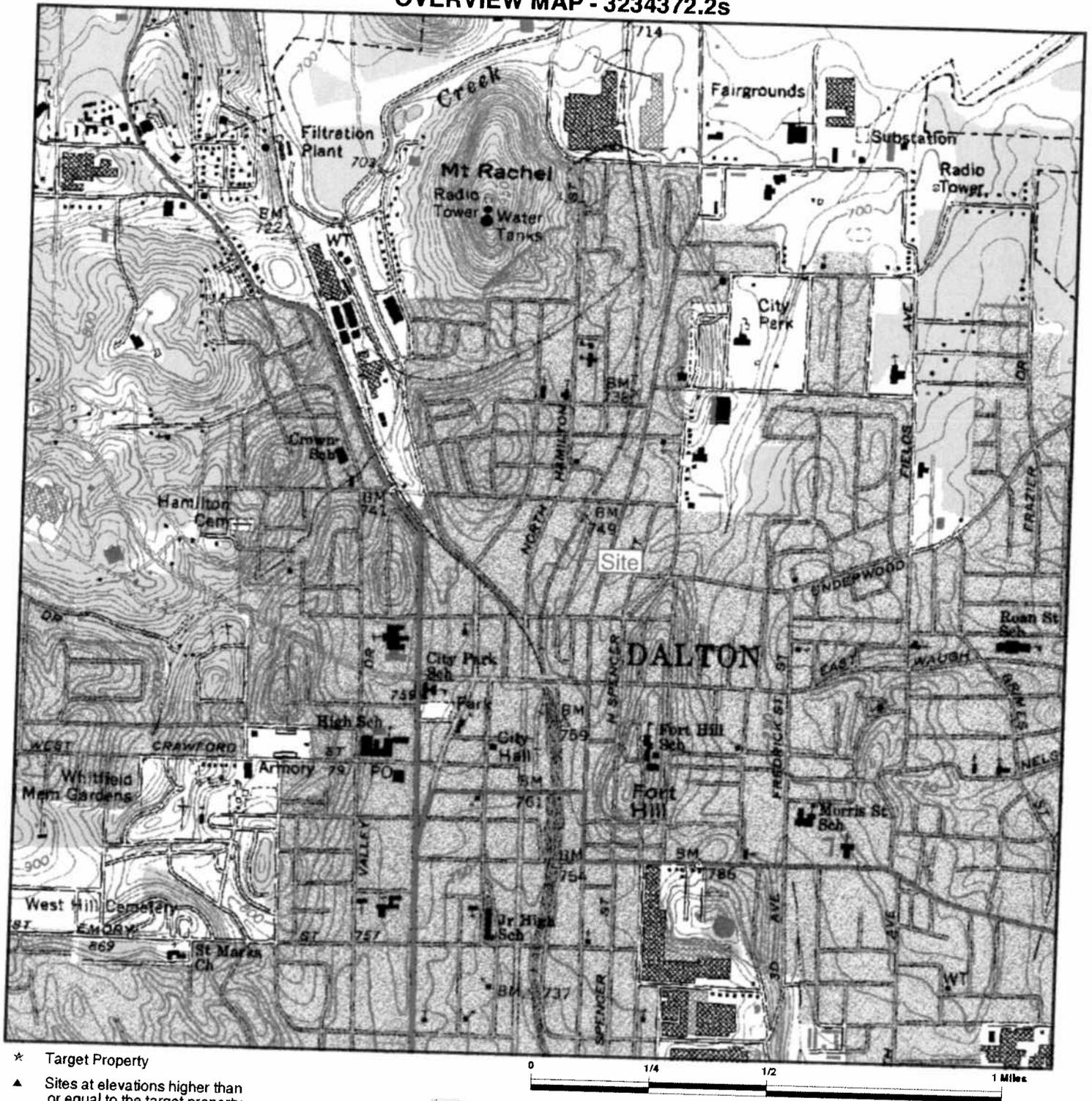
Although not identified as a REC to the site, Terracon observed numerous 5-gallon buckets and 55-gallon drums which appeared to contain used and/or new automotive fluids and/or

related substances. Terracon recommends characterizing and properly disposing of said substances.

## **9.0 DECLARATION**

I, John A. Meadow, declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in Section 312.10 of 40 CFR 312; and I have the specific qualifications based on education, training, and experience to assess a site of the nature, history, and setting of the subject site. I have developed and performed the All Appropriate Inquiries in conformance with the standards and practice set forth in 40 CFR Part 312.

# OVERVIEW MAP - 3234372.2s



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- National Priority List Sites
- Dept. Defense Sites

- Indian Reservations BIA
- Oil & Gas pipelines from USGS
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

<p><b>SITE NAME:</b> Dalton Warehouse Building  <b>ADDRESS:</b> 442 North Hamilton Street                  Dalton GA 30721  <b>LAT/LONG:</b> 34.7786 / 84.9672</p>	<p><b>CLIENT:</b> Terracon, Inc.  <b>CONTACT:</b> Brian Rohr  <b>INQUIRY #:</b> 3234372.2s  <b>DATE:</b> January 05, 2012 10:34 am</p>
--	--

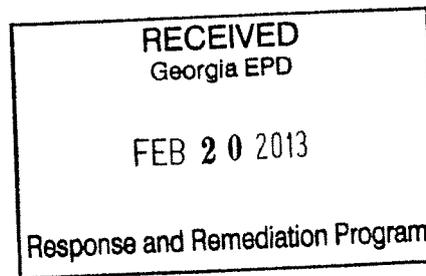


# COPY



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**UNITED CONSULTING**



February 19, 2013

Mr. Derrick Williams  
Program Manager  
Response and Remediation Program  
Environmental Protection Division  
Department of Natural Resources  
2 Martin Luther King, Jr. Drive, SE  
Suite 1462, Floyd Tower East  
Atlanta, GA 30334

RE: Initial HSRP Release Notification  
**Glenwood Avenue Tract**  
800/846 Glenwood Avenue  
Fulton County  
Atlanta, Georgia  
United Consulting Project Number: 2012.3820.05

Dear Mr. Williams:

Enclosed are the Hazardous Sites Response Program (HSRP) Release Notification form and supporting documents for the release notification on the above referenced Project Site. The following items are attached for your review of the release detected at this Project Site:

- A. Notification Forms with required Site Summary and Site Plans;
- B. Laboratory analytical testing data; and;
- C. USGS Topographic Quadrangle Map.

RQSM calculations were performed for the known release of substances detected in the soils that are regulated under the HSRP Rules<sup>1</sup>. Please note that the impacted soils are currently being excavated and removed from the site. The following Table summarizes the results of the RQSM scoring based on the data available at this time.

<sup>1</sup> Rules of Department of Natural Resources, Environmental Protection Division, Chapter 391-3-19, Hazardous Sites Response.

6062

# 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 20 2013

Response and Remediation Program

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

## PART I - PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)				
3	Tax Map and Parcel ID Number:	14 00210 LL0106		Acreage	13.76
4	Site or Facility Name	Glenwood Tract			
5	Site Street Address	800/843 Glenwood Avenue, SE			
6	Site City	Atlanta	County	Fulton	Zip
7	Property Owner	LaFarge			
8	Property Owner Mailing Address	12735 Morris Road, Suite 300			
9	Property Owner City	Atlanta		State	GA
10	Property Owner Telephone No.	678-746-2077	Zip	30004	
11	Site Contact Person	Mr. Richard Tyler	Title	Director of Land Management	
12	Site Contact Company Name	LaFarge			
13	Site Contact Mailing Address	12735 Morris Road, Suite 300			
14	Site Contact City	Alpharetta	State	GA	Zip
15	Site Contact Telephone No.	678-746-2077	Zip	30004	
16	Facility Operator Contact Person	Mr. Richard Tyler	Title	Director of Land Management	
17	Facility Operator Company Name	LaFarge			
18	Facility Operator Mailing Address	12735 Morris Road, Suite 300			
19	Facility Operator City	Alpharetta	State	GA	Zip
20	Facility Operator Telephone No.	678-746-2077	Zip	30004	

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.

Mr. Richard Tyler

Director of Land Management

NAME (Please type or print)

TITLE

SIGNATURE

2/19/13

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, possibly from historic fill materials

**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 soil release, possibly from historic fill material

**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 Environmental Assessment was conducted on the site. Four PAH constituents have been identified in soils above their respective Notification Concentrations (NC). The property owner is currently removing the impacted soils from the site. Several monitoring wells have been placed on the site and groundwater in the immediate vicinity of the release has not been impacted by the identified constituents.

**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.**  
Fencing has been placed around the area of the known release. Further, vehicular access to the greater site is limited by a locked and gated entrance.

**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 impacted soils are located approximately 10 to 15 feet below the ground surface. The surface of the site is covered in concrete that ranges anywhere from 6 to 10 inches thick. The contaminated soils are currently being excavated from the site and transported to an off-site disposal facility. The area of the excavation is fenced.

## 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: Enso Apartments

Address: 880 Glenwood Avenue

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.

### 9. SITE SUMMARY

### REQUIRED ATTACHMENTS

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>.





## ATTACHMENT 9A: Site Summary

The Project Site consists of an approximate 13.77-acre tract of land located in Land Lot 106 of the 14<sup>th</sup> District of Fulton County, and is referenced by the address of 800/846 Glenwood Avenue, Atlanta, Fulton County, Georgia. The Project Site is located northwest of the intersection of Bill Kenedy Way and Glenwood Avenue. According to the Fulton County GIS website, the Project Site is referenced by Parcel ID 14 0021 LL0106. The approximate latitude/longitude of the Project Site is N33° 44' 29.56"/W84° 21' 36.92". The general location of the Project Site is illustrated on Figure 9B1.

The Project Site is improved with an approximate 68,000 square foot, metal building. Future plans for the site will include demolishing this structure. Properties in the vicinity of the Project Site primarily consist of residential homes/neighborhoods. Maynard Jackson High School is located to the south of the Project Site. The planned future use of the Project Site is commercial retail.

Various due diligence activities had been conducted on the Project Site by Contour Engineering. This included a Phase I Environmental Assessment (ESA) and multiple subsurface investigations including soil and groundwater sampling. Upon completion of due diligence activities, Contour Engineering provided the property owner with the results of their investigation. Review of the due diligence documents determined that two PAH constituents were detected in the soil above their respective NCs. United Consulting on behalf of the property owner mobilized a direct push drill rig to the site to delineate further the release. United Consulting's drilling activities identified two additional PAH constituents above their respective NCs. The locations of the samples collected are illustrated on Figure 9B3.

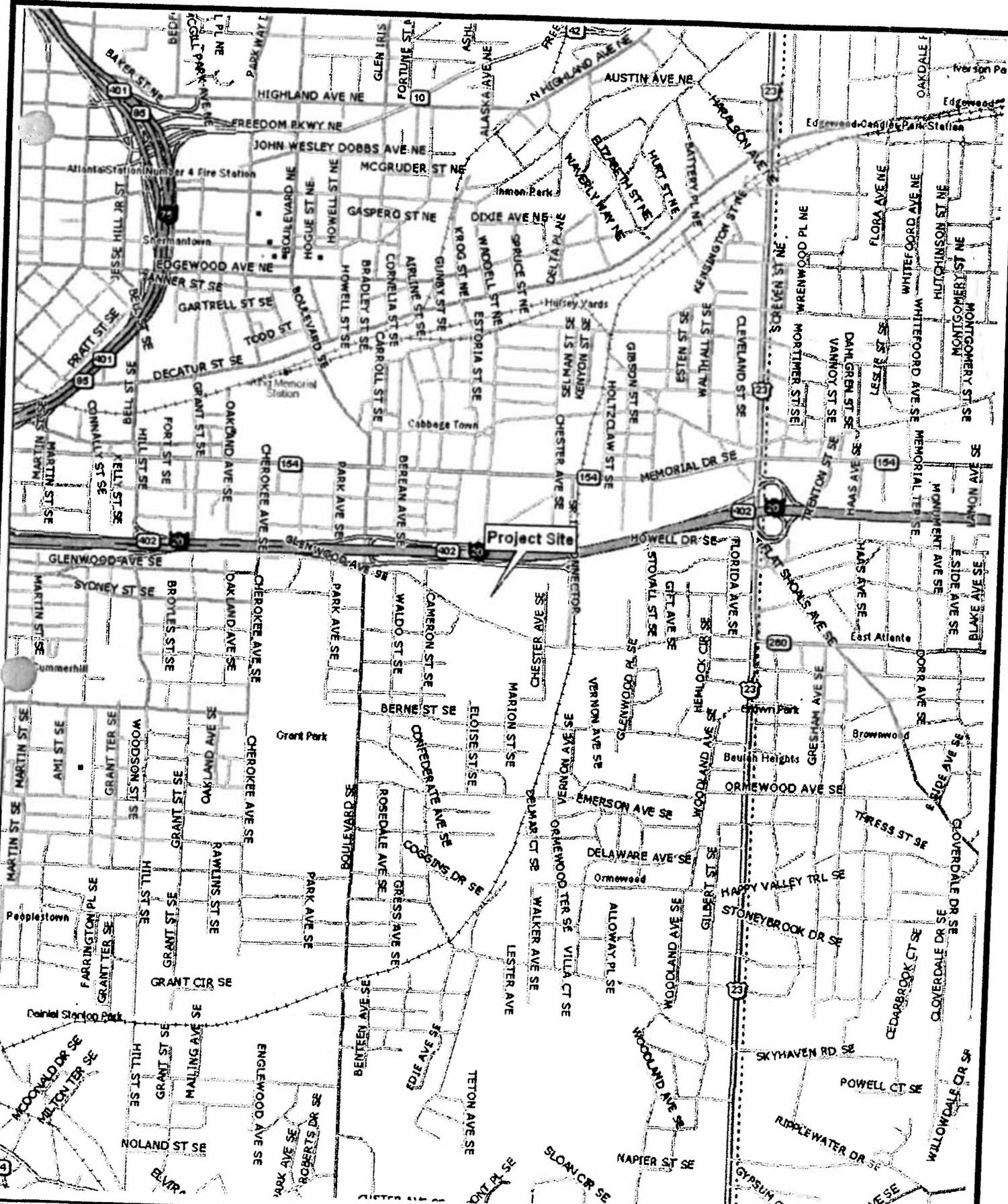
The property owner has elected to remove the impacted soils from the site. Removal of these soils is currently underway; however, total removal will not occur before the 30-day notification threshold. The area of the release/excavation is surrounded by a 6-foot chain link fence. Vehicular access to the greater property is restricted by a locked gate.

On-Site Pathway scoring was conducted and is presented in Appendix C. Based on the scoring calculation, the On-Site Pathway score is below the threshold of 10.

With the above documented site conditions and data, United Consulting respectfully requests on behalf of the property owner, that the Project Site not be listed on the Hazardous Site Inventory (HSI).

**ATTACHMENTS 9B1, 9B2, and 9B3 (Figures)**

**9B1 – Site Location Map**  
**9B2 – USGS Topographic Map**  
**9B3 – Boring Location Map**



Scale:	1"=2,000"
Prepared:	SHH
Checked:	Shh
Project No.:	2012.3820.05

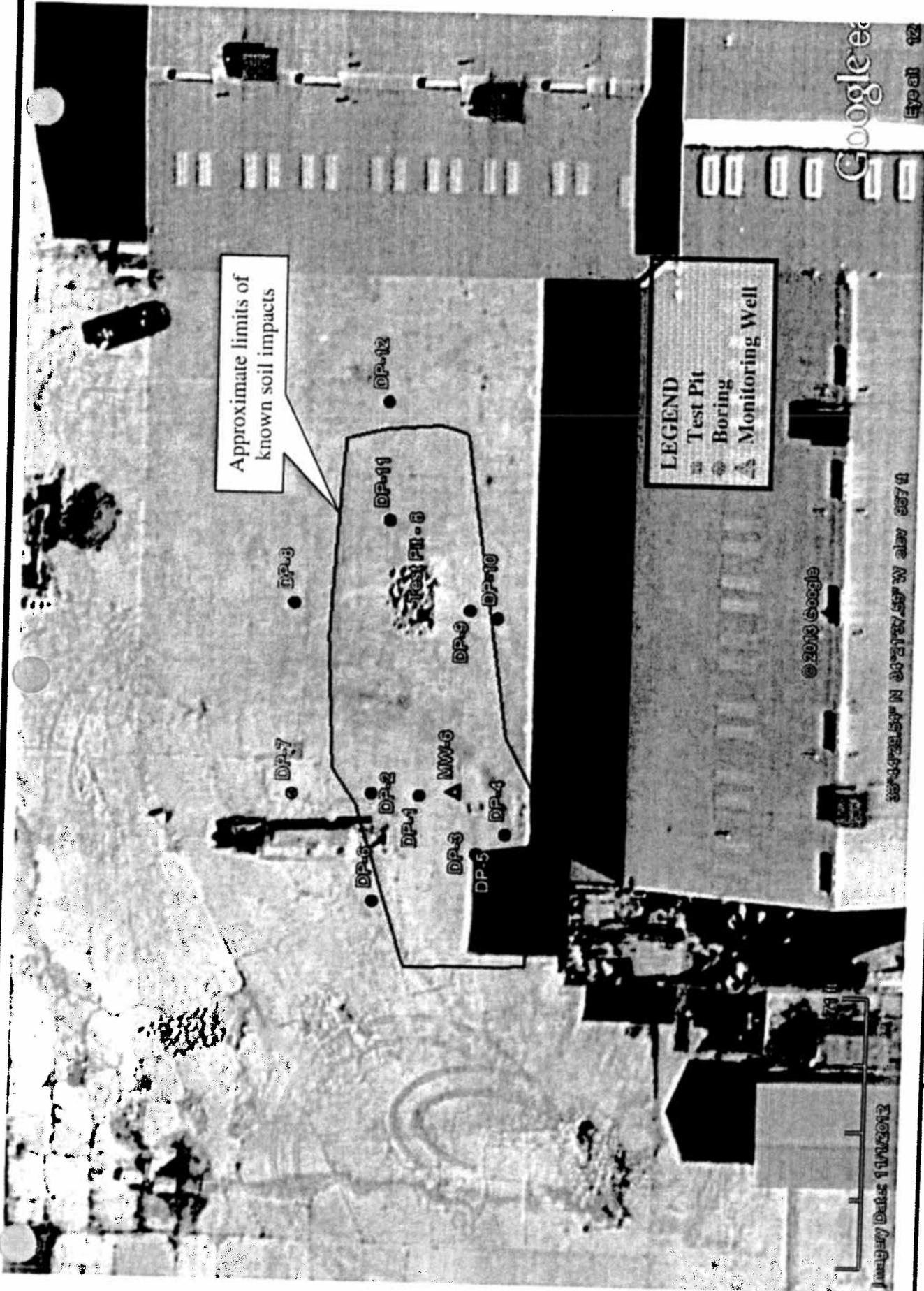
Client:	LaFarge
Site:	Glenwood Tract 800/843 Glenwood Ave.
Title:	Site Location Map

**FIG.9B1**



Scale:	1"=2,000"	Client:	LaFarge
Prepared:	SHH	Site:	Glenwood Tract 800/843 Glenwood Ave.
Checked:	Shh		
Project No.:	2012.3820.05	Title:	USGS Topographic Map

**FIG.9B2**



 <i>We're here for you</i> <b>UNITED CONSULTING</b>		Scale:	As Shown	Notes:	Client:	Lafarge
		Prepared:	SHH		Site:	Glenwood Avenue 800/843 Glenwood Ave
		Checked:	Shh		Title:	Boring Location Plan
		Project No.:	2012.3820.05			

**FIG. 9B3**

**ATTACHMENT B - LABORATORY ANALYTICAL TESTING  
DATA**



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February 22, 2013

Mr. Derrick Williams  
Program Manager  
Response and Remediation Prog  
Environmental Protection Divis  
Department of Natural Resource  
2 Martin Luther King, Jr. Drive  
Suite 1462, Floyd Tower East  
Atlanta, GA 30334

RE: Initial HSRP Release No  
**Briarcliff/Pendergrast**  
1996 Chrysler Drive  
DeKalb County  
Atlanta, Georgia  
United Consulting Proj

Dear Mr. Brownlee:

Enclosed are the Hazardous &  
supporting documents for the  
are aware, due diligence activit  
recent acquisition of the prop  
cadmium impacts in the soil a  
(NCs), and arsenic in ground  
previously discussed with you,

The Project Site has been &  
Prospective Purchaser Corre  
Protection Division on January  
link fence with locked gates, a  
Corrective actions will contin  
Compliance Status Report (PP

The following items are attach

- A. Notification Forms with required Site Summary and Site Plans,
- B. Laboratory analytical testing data;
- C. Receptor/Well Survey and Reportable Quantity Screening Method (RQSM) Scoring report, and;
- D. USGS Topographic Quadrangle Map.

HSRP ROUTING FORM

From: *Naomi*

Date: *2-27-2012*

1.	<i>ELISE</i>		
2.			
3.			
4.			
5.			
6.			

RETURN TO: \_\_\_\_\_

Comments: \_\_\_\_\_

RQSM calculations were performed for the known release of substances detected in the groundwater that are regulated under the HSRP Rules<sup>1</sup>. On-Site Pathway scoring was not conducted as the soil impacts are being remediated under the EPD approved PPCAP. The following Table summarizes the results of the RQSM scoring.

### RQSM PATHWAYS SCORE SUMMARY

Chemical Threshold	Groundwater Pathway Score	On-Site Pathway
Arsenic	10 8.13	20 NA
<b>Notes:</b> NA: Not applicable RQSM Scoring included in Attachment C.		

As documented herein, the only drinking water well/supply within 3 miles of the release on the Project Site is between 1 to 2 miles away. However, this well is not hydraulically connected to the Project Site. The arsenic groundwater release has also been laterally delineated to non-detect in a down gradient monitoring well on the Project Site. As such, the nearest well to the release is considered greater than 3 miles away. With this, the data in the Site Summary below and the Brownfields status of the Project Site, United Consulting respectfully requests on behalf of the current property owner, that the Project Site not be listed on the Hazardous Site Inventory (HSI).

If any other information regarding the property is required, please contact Russell Griebel at (770) 582-2788 at United Consulting. Thank you for your prompt attention.

Sincerely,

#### UNITED CONSULTING



Russell C. Griebel, P.G., C.P.G.  
Associate Environmental Specialist



Scott D. Smelter  
Principal

RCG/SDS/tl

c: ***Kent Pierce and Abena Ajanaku, Brownfields Development Unit***  
***[kent.pierce@dnr.state.ga.us](mailto:kent.pierce@dnr.state.ga.us) and [Abena.Ajanaku@dnr.state.ga.us](mailto:Abena.Ajanaku@dnr.state.ga.us)***

SharePoint: 2012.3496.04.HSRP.notification

<sup>1</sup> Rules of Department of Natural Resources, Environmental Protection Division, Chapter 391-3-19, Hazardous Sites Response.



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UNITED CONSULTING

ISO

9001:2008 Certified

**ATTACHMENT A**  
**NOTIFICATION FORMS WITH REQUIRED SITE SUMMARY**  
**AND SITE PLANS**

6065

# RELEASE NOTIFICATION/REPORTING FORM



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

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

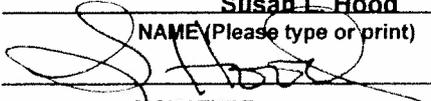
## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)				
3	Tax Map and Parcel ID Number:	18 194 05 002	Acreage	4.7	
4	Site or Facility Name	Briarcliff/Pendergrast Property			
5	Site Street Address	1996 Chrysler Drive			
6	Site City	Atlanta	County	DeKalb	Zip 30345
7	Property Owner	DeKalb County			
8	Property Owner Mailing Address	330 West Ponce DeLeon Avenue			
9	Property Owner City	Decatur	State	GA	Zip 30030
10	Property Owner Telephone No.	404-371-2270			
11	Site Contact Person	Dave Butler	Title	Greenspace Envmt Manager	
12	Site Contact Company Name	DeKalb County			
13	Site Contact Mailing Address	330 West Ponce DeLeon Avenue			
14	Site Contact City	Decatur	State	GA	Zip 30030
15	Site Contact Telephone No.	404-371-2540			
16	Facility Operator Contact Person	Not Applicable	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.

Susan L. Hood Administrator Natural Resources  
 NAME (Please type or print) TITLE

  
 SIGNATURE

DATE  
 2/26/13

## PART II -- RELEASE INFORMATION

Page \_\_\_\_ of \_\_\_\_

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

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

Based on pre-acquisition due diligence activities, the source for the release is believed to be 3, 55-gallon, drums that reportedly contained "tar like materials" used as a sealant on the external portion of the basement walls of the existing residential structure. The drums were located in a wet weather ditch and were partially buried.

**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). Due diligence activities, including soil and groundwater sampling, have been performed. The drums, which are believed to have been the source of the release, have been removed and corrective action pursuant to the Georgia Brownfields Program is ongoing.**

**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 of the release is surrounded by a 6-foot chain link fence equipped with locked gates at the access points. This fencing will remain in place until the remedial efforts are completed.

**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 \_\_\_\_\_ 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: 3436 Briarcliff Road

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

Less than 0.5 miles       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: Hodges (note that this well is not hydraulically connected to the property)

Address: 1819 Frazier Road, Decatur, GA 30033

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>.





## ATTACHMENT 9A: Site Summary

The Subject Site consists of an approximate 4.7-acre tract of land located at 1996 Chrysler Drive, Atlanta, Georgia, in Land Lot 194 of the 18<sup>th</sup> District of DeKalb County. The Subject Site is located in the northwest quadrant of the intersection of Briarcliff Road and Chrysler Drive. The general location of the Project Site is illustrated on Figure 9B1.

The Subject Site is improved with an approximate 2,400 square foot, two-story brick home with a basement. Plans are in place to demolish this structure. A small, apparent wet-weather drainage ditch traverses the central portion of the property. Properties in the vicinity of the Subject Site primarily consist of residential homes/neighborhoods. Lakeside High School was located further to the northeast. The planned future use of the Subject Site is a County park.

Various due diligence activities were conducted on the Project Site by United Consulting for the County prior to acquisition, including soil and groundwater sampling. Three 55-gallon drums were identified within/near the on-site wet-weather drainage ditch. Staining in the form of "tar like materials" was observed at the base of one of the drums. Based on information provided by the property owner, the drums had reportedly contained tar, which was used as a sealant on the external portion of the basement walls.

Soil and groundwater sampling included approximately 90 soil samples and two groundwater samples for various analysis including volatile organic compounds (VOCs), semi-VOCs (SVOCs), RCRA metals, pesticides, herbicides, and polychlorinated biphenyls (PCBs). Only arsenic and cadmium were detected in soil above their NCs. Arsenic was detected in one groundwater sample, and barium was detected in the two groundwater samples at concentrations consistent with typical background concentrations for this area. None of the other tested constituents were detected. The locations of the samples collected are illustrated on Figures 9B2, 9B3, 9B4, 9B5. Soil and groundwater quality maps are included as 9B4 and 9B5.

The Project Site has been accepted into the Georgia Brownfields Program pursuant to a Prospective Purchaser Corrective Action Plan (PPCAP) approved by the EPD on January 24, 2013. Based on the assessments, the material within the drum(s) is the likely source of the arsenic and isolated cadmium impacts detected in the soil on the Subject Site. The three 55-gallon drums and visibly impacted soils around the drums have been removed and appropriately disposed. The area of the release is surrounded by a 6-foot chain link fence with locked gates. Corrective actions will continue and be documented upon completion in a Prospective Purchaser Compliance Status Report (PPCSR).

Based on United Consulting's receptor survey, the only drinking water supply well within 3 miles of the release on the Project Site is between 1 to 2 miles away. However, it is not hydraulically connected to the Project Site. In addition, the arsenic groundwater release has been laterally delineated to non-detect in a down gradient monitoring well on the Project Site. As such, the nearest well to the release is considered greater than 3 miles away. The locations of the receptors are illustrated on the Well Location Maps in Appendix A of Attachment C of this notification.

RQSM Groundwater Pathway calculations were performed for the chemicals detected in the groundwater that are regulated under the HSRP Rules. On-Site Pathway scoring was not conducted as the soil impacts are being remediated under the EPD approved PPCAP. Scoring justifications are included with the RQSM Calculation in Appendix B of Attachment C of this notification. Based on the scoring calculation, the Groundwater Pathway score is below the threshold of 10.

With this above documented site conditions and data and the property's Brownfields status, United Consulting respectfully requests on behalf of the property owner, that the Project Site not be listed on the Hazardous Site Inventory (HSI).

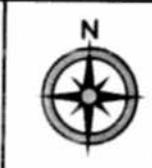
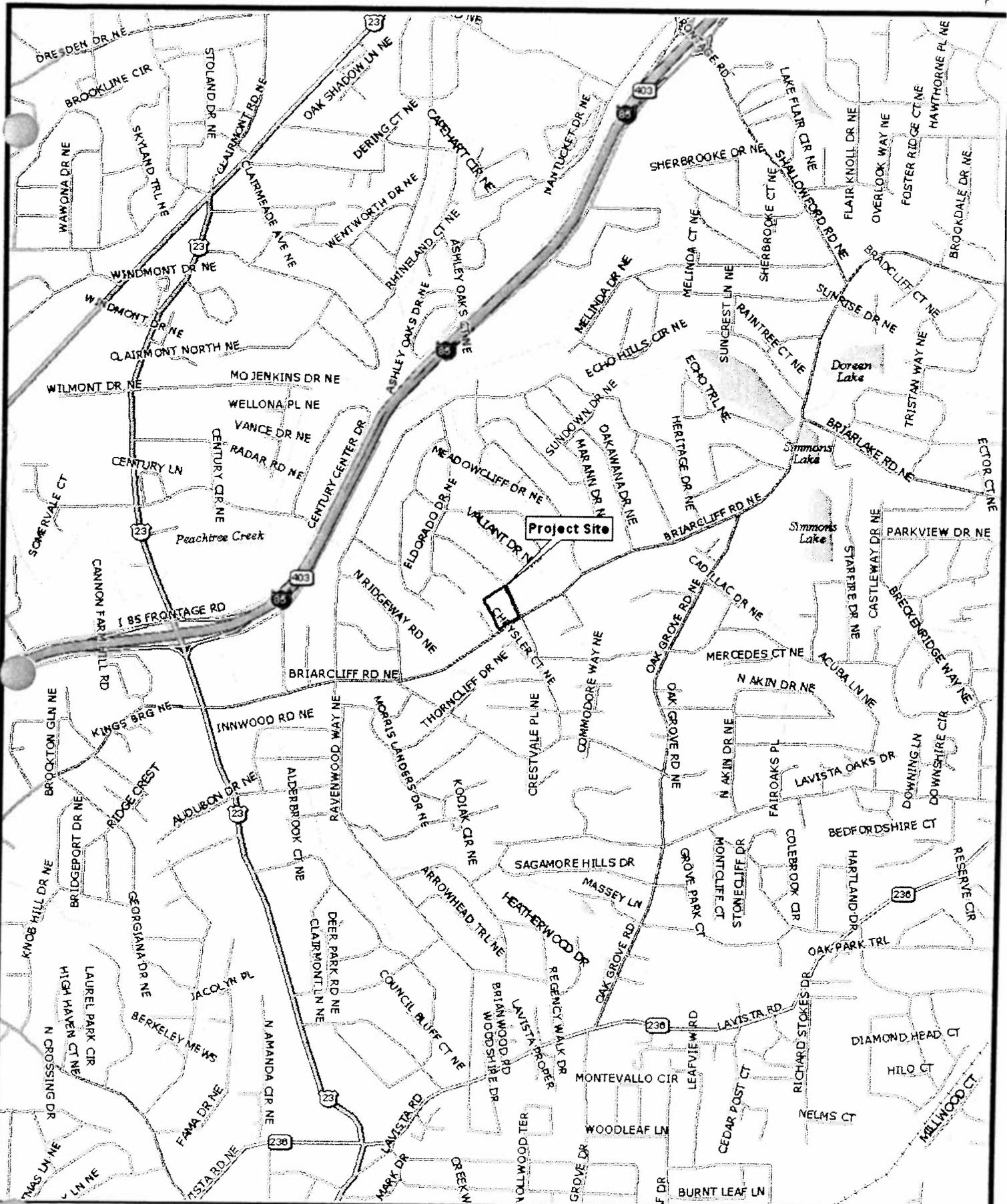


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UNITED CONSULTING

ISO

9001:2008 Certified



Scale:	1"=2,000'
Prepared:	BNB
Checked:	DH
Project No.:	2012.3496.01

Client:	DeKalb County - Natural Resources
Site:	Briarcliff / Pendergrast Property
Title:	Site Location Map

**FIG. 9B1**

6063

# 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 22 2013

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:	00810-00000-011-000 & C0810-00000-011-000	Acreage	13.48	
4	Site or Facility Name	SRG Global			
5	Site Street Address	10116 Industrial Boulevard			
6	Site City	Covington	County	GA	Zip 30014
7	Property Owner	Covington Moulding Co. c/o Guardian Automotive			
8	Property Owner Mailing Address	2300 Harnon Road			
9	Property Owner City	Auburn Hills	State	MI	Zip 48326
10	Property Owner Telephone No.	248-340-1800			
11	Site Contact Person	Ms. Nancy Betti	Title	Environmental Coordinator	
12	Site Contact Company Name	SRG Global			
13	Site Contact Mailing Address	10116 Industrial Boulevard			
14	Site Contact City	Covington	State	GA	Zip 30014
15	Site Contact Telephone No.	770-786-8182			
16	Facility Operator Contact Person	Mr. Michael Anderson	Title	Plant Manager	
17	Facility Operator Company Name	SRG Global			
18	Facility Operator Mailing Address	10116 Industrial Boulevard			
19	Facility Operator City	Covington	State	GA	Zip 30014
20	Facility Operator Telephone No.	770-786-8182			

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.

Mike Anderson  
 NAME (Please type or print)

Plant Manager  
 TITLE

[Signature]  
 SIGNATURE

2-21-2013  
 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:**

Suspected source of the release is associated with the operation of a vapor degreaser using tetrachloroethylene onsite since circa 1969 to sometime between 1972 and 1976.

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

The release date is unknown, the facility has been in operation since circa 1969 and the vapor degreaser was taken out of service sometime between 1972 and 1976.

**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 have been collected and analyzed. Please see summary included as Attachment A. Additional sampling 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.**

The facility is partially enclosed by a gated fence, which remains open during 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 areas of impact include an unpaved, landscaped area located outside the northern exterior wall of the main building, with remaining impacted areas located beneath asphalt and/or concrete pavement.

## 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: Helen Benton

Address: 10143 Settlers Grove Road, Covington, GA 30014

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: Robert W & Roberta J Castleberry

Address: 70 Kay Circle, Covington, GA 30014

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.

Please see 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.

Please see Attachment B.

### 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>.

Please see Attachment C.







**ATTACHMENT A**  
**SITE SUMMARY**

**SRG Global  
10116 Industrial Boulevard  
Covington, Newton County, Georgia**

**Site Summary**

The site consists of 13.48 acres, with current and historical onsite operations consisting of automotive trim manufacturing. Other historical onsite operations include anodizing, which ceased in 2006, and hydrographics. Onsite structures include an approximately 200,000-square-foot office and manufacturing building. Other improvements include 149,750 square feet of asphalt covered parking areas, 18,100 square feet of concrete covered parking and access areas, grass and low-lying shrub covered landscaped areas, a covered drum storage area and a pole barn that is used for exterior storage of packing and shipping materials. The site is partially enclosed by 3,720 linear feet of chain-link fencing equipped with a locked gate that is left unlocked during business hours. Access to the facility is from the north, via Industrial Boulevard.

Adjacent properties include commercial/industrial businesses to the north; commercial properties to the east; private residences to the south; and light industrial buildings to the west. Point of Grace Christian School and Kid Zone Everyday Afterschool Program, a school and child daycare center, located at 10255 Industrial Boulevard are located approximately 650 feet northeast of the site. The school and daycare center and the surrounding residences and commercial/industrial properties are connected to the municipal water and sanitary sewerage services.

Three industrial wells utilized for production and cooling water are located at Fiber Visions Manufacturing Co., located approximately 0.70 mile west of, and topographically cross-gradient relative to, the subject property, at 7101 Alcovy Road NE in Covington. The closest residential potable water well on record belongs to Mr. Robert W & Ms. Roberta J Castleberry and is located at 70 Kay Circle in Covington. This well is located approximately 3.2 miles southeast of, and topographically down-gradient relative to, the subject property.

According to Newton County Cornish Creek Water Treatment Plant representatives, potable water in Newton County is obtained from surface water sources and the County does not maintain potable water wells. Interviews with representatives of the Newton County Health Department, Environmental Health Division, revealed that the Department of Environmental Health does not maintain records of private potable water wells. A visual survey of properties located within an approximate ½-mile radius of the subject property did not reveal the presence of potable water wells.

Onsite operations historically included the use of a vapor degreaser between *circa* 1969 and sometime between 1972 and 1976.

**SRG Global**  
**10116 Industrial Boulevard**  
**Covington, Newton County, Georgia**

**Site Summary – Investigation Summary**

A limited subsurface investigation was performed at SRG Global (SRG) in January 2013. Subsurface investigation activities included the collection of soil and groundwater samples from five soil borings/groundwater monitoring wells installed throughout the site. Selected soil and groundwater samples were analyzed for volatile organic compounds (VOCs) and Resource Conservation and Recovery Act (RCRA) metals.

Analytical results of soil samples revealed the presence of trichloroethylene in soil samples collected from MW- 1 (0.018 milligrams per kilogram [mg/kg] at 24 feet below ground surface [bgs]), MW-3 (0.598 mg/kg at 15 feet bgs and 0.110 mg/kg at 25 feet bgs), MW-4 (0.124 mg/kg at 10 feet bgs and 0.0743 mg/kg at 12 feet bgs) and MW-5 (0.0067 mg/kg at 18 feet bgs and 0.0074 mg/kg at 24 feet bgs).

Analytical results of groundwater samples revealed the presence of benzene in a groundwater sample collected from MW-1 at 0.0081 milligrams per liter (mg/L); 1,1-dichloroethylene from groundwater samples collected from MW-1 (0.0538 mg/L), MW-4 (0.107 mg/L) and MW-4 Duplicate (0.0927 mg/L); cis-1,2-dichloroethylene in groundwater samples collected from MW-3 (0.180 mg/L), MW-4 (0.608 mg/L) and MW-4 Duplicate (0.536 mg/L); methylene chloride (a common laboratory artifact) in a groundwater sample collected from MW-3 (0.130 mg/L); tetrachloroethylene from a groundwater sample collected from MW-5 (0.0328 mg/L); trichloroethylene from groundwater samples collected from MW-1 (0.026 mg/L), MW-2 (0.0067 mg/L), MW-3 (2.650 mg/L), MW-4 (2.080 mg/L), MW-4 Duplicate (1.790 mg/L) and MW-5 (0.0241 mg/L); and vinyl chloride in groundwater samples collected from MW-4 (0.0138 mg/L) and MW-5 (0.0088 mg/L).

For a complete copy of laboratory analytical results of soil and groundwater samples please refer to Attachment D.



**ATTACHMENT B**

**SITE MAP**



**RECEIVED**  
Georgia EPD

FEB 22 2013

February 22, 2013

**Response and Remediation Program**

Mr. Derrick Williams  
**Georgia Environmental Protection Division**  
Response & Remediation Division  
Floyd Towers East, Suite #1462  
2 Martin Luther King Jr. Drive, S.E.  
Atlanta, Georgia 30334-9000

**RE: Hazardous Sites Response Act Release Notification**  
SRG Global  
10116 Industrial Boulevard  
Covington, Newton County, Georgia

Dear Mr. Williams:

Enclosed, please find a completed and signed Georgia Environmental Protection Division (GAEPD) Release Notification Form for the SRG Global property located at 10116 Industrial Boulevard in Covington, Newton County, Georgia (the "subject property"). Limited subsurface investigation activities conducted in January 2013 revealed the presence of: (1) trichloroethylene at levels above the notification concentration for trichloroethylene in Appendix I of the Georgia Hazardous Site Response Act (HSRA) Regulations in soil samples collected from the subject property; and (2) detections of benzene, 1,1-dichloroethylene, cis-1,2-dichloroethylene, methylene chloride, tetrachloroethylene, trichloroethylene and vinyl chloride in unfiltered groundwater samples collected from the subject property.

The Covington facility is occupied by an automotive trim manufacturer. Historical onsite operations included the use of a vapor degreaser that utilized tetrachloroethylene from *circa* 1969 to sometime between 1972 and 1976, which is the suspected source of observed impacts.

If you have any questions or concerns regarding this submittal, please contact me at (770) 590-6708 or Ms. Mary A. Metcalf at (813) 402-3610.

Sincerely,

**Bureau Veritas North America, Inc.**

Christopher J. Ostermann  
Project Manager  
Health, Safety and Environmental  
Atlanta Regional Office

Enclosure

***Bureau Veritas North America, Inc.***

3380 Chastain Meadows Parkway, Suite 300  
Kennesaw, GA 30144

Main: (770) 499-7500

Fax: (770) 499-7511

[www.us.bureauveritas.com](http://www.us.bureauveritas.com)