

LETTER OF TRANSMITTAL

**Terracon**

2855 Premiere Parkway  
Suite C  
Duluth, GA 30097  
770-623-0755 fax: 770-623-9628

February 28, 2013

To: Mr. David Reuland / Unit Coordinator

Georgia Environmental Protection Division

2 Martin Luther King Jr. Drive SE

Suite 1462 East

Atlanta, Georgia 30334

RECEIVED  
Georgia EPD

MAR 1 2013

Response and Remediation Progra

We are transmitting  herewith  under separate cover

HSRA Release Notification: 1 Copies

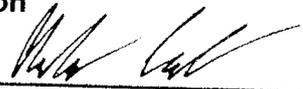
Project Name: Bank Branch  
Columbus, GA

Project No.: 49127375A

Remarks:

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Yours truly,  
**Terracon**

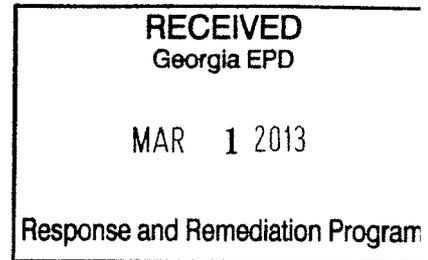
By 

Chelsea Curl;  
Staff Geologist / Environmental Department  
Atlanta, Georgia Office

February 28, 2013

Mr. David Reuland  
Unit Coordinator  
Georgia Environmental Protection Division  
Hazardous Waste Management Branch  
2 Martin Luther King Jr Drive SE  
Suite 1462 East  
Atlanta, Georgia 30334

Re: HSRA Release Notification  
Bank Branch  
123 12<sup>th</sup> Street  
Columbus, Muscogee County, Georgia



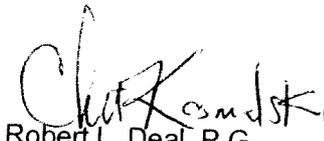
Dear Mr. Reuland:

Terracon Consultants, Inc. (Terracon), on behalf of Border Properties LLC, is pleased to present the Release Notification package for the above-referenced site. The site consists of a vacant bank branch/office building, which was constructed in 1966. As part of an ongoing real estate transaction, soil and groundwater sampling was performed at the site in November 2012 to evaluate potential impacts from historic on-site dry cleaners, gasoline filling stations, and automotive repair operations, as well as off-site dry-cleaners and gasoline filling stations. Chloroform was detected in groundwater at the Bank Branch; however, the detected concentration did not exceed the maximum contaminant levels (MCL). Low levels of petroleum constituents were detected in site soil and groundwater. The release of petroleum constituents at the site will be reported to the GEPD USTMP department under separate cover. Based on our preliminary findings, we believe that the site does not meet the applicable criteria for listing on the HSI. Enclosed is the Release Notification Form for the Bank Branch and supporting documents for your review.

If you have any questions or require additional information, do not hesitate to contact the undersigned at 770-623-0755.

Sincerely,

  
Chelsea Curl  
Staff Geologist

  
For: Robert L. Deal, P.G.  
Senior Geologist

Attachments:

Site Summary

GEPD HSRA Release Notification Form

Terracon Limited Site Investigation, dated December 17, 2012

Preliminary Reportable Quantity Screening Method (RQSM) scoring

Brank Branch  
123 12<sup>th</sup> Street  
Columbus, Muscogee County, Georgia

### Site Summary

Terracon performed a Phase I Environmental Site Assessment (ESA) for the site in October 2012. The site currently consists of an approximate 0.336 acre parcel of land containing a vacant bank branch, office building, and paved parking areas. The ESA identified on-site recognized environmental conditions (RECs) as a result of historic dry-cleaners, gasoline filling stations, and automotive repair operations located on the site, which operated between the early 1900s and 1960s. Additionally, a former off-site dry-cleaners and gasoline filling station were identified east/northeast of the site, and a former furniture repair, painting, and dying facility was identified adjacent to the site to the west. Further investigation of the site was performed in November 2012, consisting of the advancement of soil borings with conversion to temporary groundwater monitoring wells.

Soil and groundwater samples were collected at the site by Terracon as part of due diligence activities associated with a financial transaction involving the site. Sampling activities were conducted within the assumed, potential on-site source area locations, or in a topographic (assumed hydraulic) downgradient location from the identified off-site RECs. The soil and groundwater samples collected were analyzed for volatile organic compounds (VOCs) by EPA Method 8260, and polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8270; additionally, groundwater sample B2 was analyzed for total RCRA Metals by EPA Methods 6010 and 7471/7470.

The VOC chloroform and the metal barium were detected above laboratory reporting limits in site groundwater. However, the detected concentrations did not exceed the maximum contaminant levels (MCL) for either constituent. Low levels of petroleum constituents were detected in site soil and groundwater. The release of petroleum constituents at the site will be reported to the GEPD USTMP department under separate cover.

A water well and receptor survey was not conducted by Terracon; however, Terracon assumes a private well exists within 0.5 miles of the site. Based on available information, Terracon performed preliminary Reportable Quantity Screening Method (RQSM) scoring for the chloroform identified in groundwater at the site. Terracon's preliminary RQSM Scoring indicates that a reportable quantity release has not occurred and that the site does not meet the applicable criteria for listing on the HSI. However, it should be noted that official determination is made by the GEPD.

3066

# 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  
MAR 1 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:	004 006 001	Acreage	0.336	
4	Site or Facility Name	Bank Branch			
5	Site Street Address	123 12th Street			
6	Site City	Columbus	County	Muscogee	Zip 31901
7	Property Owner	<del>Perry Borom</del> BOR-Dev Properties LLC			
8	Property Owner Mailing Address	<del>PO Box 936</del> P.O. Box 936			
9	Property Owner City	<del>Fortson</del> Fortson	State	GA	Zip 31808
10	Property Owner Telephone No.	<del>706-681-3879</del> Larry Derby (706) 575-1475, P. Borom			
11	Site Contact Person	Larry Derby	Title	Owner 706-63	
12	Site Contact Company Name	<del>BOR-Dev Properties LLC</del> BOR-Dev Properties			
13	Site Contact Mailing Address	P.O. Box 936			
14	Site Contact City	Fortson	State	GA	Zip
15	Site Contact Telephone No.	706-575-1475			
16	Facility Operator Contact Person	Perry Borom	Title	Owner Co-owner	
17	Facility Operator Company Name				
18	Facility Operator Mailing Address	PO Box 936			
19	Facility Operator City	Fortson	State	GA	Zip
20	Facility Operator Telephone No.	706-681-3879			

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.

Larry Derby NAME (Please type or print) Co-Owner TITLE  
[Signature] SIGNATURE 2/22/2013 DATE

## PART II -- RELEASE INFORMATION

Page 2 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 unknown. The chemicals identified in site groundwater are not used on site. The presence of the chemicals in the groundwater samples may be an artifact of laboratory extraction or analytical methods, or may have originated from chlorinated drinking water present in groundwater at the area of the site.

**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, physical state, and quantity of the material released are unknown. The site was previously developed as a gas station, dry cleaner, and automotive repair facility. Non-petroleum based compounds were identified in site groundwater in November 2012.

**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)**

Cleanup activities have not been initiated. Soil and groundwater samples were collected in November 2012. A preliminary RQSM Groundwater Pathway Score indicates the site does not meet applicable criteria for listing on the HSI.

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

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

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

The site is currently vacant.

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

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

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

## PART II -- RELEASE INFORMATION

(Continued)

Page 3 of   

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: Ralston Apartments

Address: 1039 1st Avenue, Columbus, GA

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       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: Well survey not performed. Presence of a well within 1/2 mile

Address: is assumed.

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

Yes       No

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

## REQUIRED ATTACHMENTS

### 9. SITE SUMMARY

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

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

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

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





# Limited Site Investigation

Bank Branch

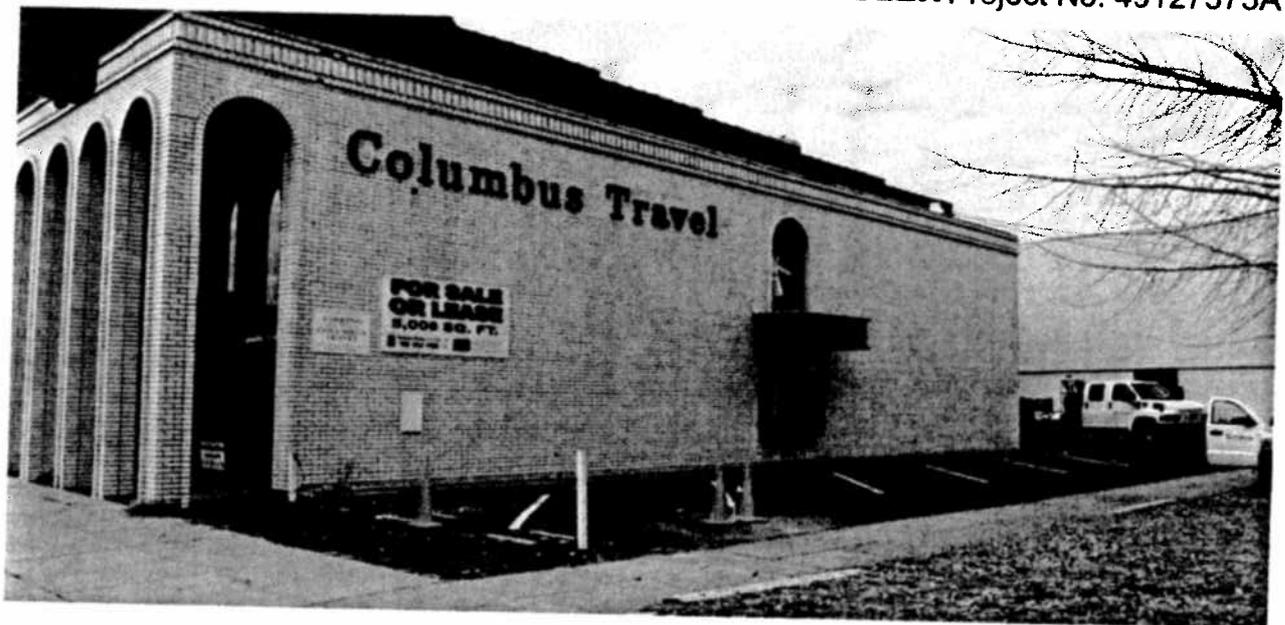
Loan No. 612005101

123 12<sup>th</sup> Street

Columbus, Muscogee County, Georgia

December 17, 2012

Terracon Project No. 49127375A



Prepared for:



**certus** BANK  
Carrollton, Georgia

Prepared by:

Terracon Consultants, Inc.  
Duluth, Georgia

Offices Nationwide  
Employee-Owned

Established in 1965  
terracon.com

# Terracon

Geotechnical ■ Environmental ■ Construction Materials ■ Facilities



December 17, 2012

CertusBank  
100 Tom Reeves Drive  
Carrollton, Georgia 30117

Attn: Mr. Jason Templeton, Senior Vice President  
Phone: 678-839-6728

Re: Limited Site Investigation  
Bank Branch  
123 12<sup>th</sup> Street  
Columbus, Muscogee County, Georgia  
Loan No. 612005101  
**Terracon** Project No. 49127375A

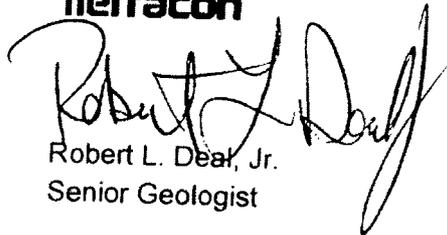
Dear Mr. Templeton:

At your request, Terracon Consultants, Inc. (Terracon) has completed a Limited Site Investigation (LSI) at the above-referenced property. This investigation was performed in general accordance with our Task Order dated November 20, 2012 and the Master Services Agreement (MSA) dated September 29, 2011 between CertusBank, N.A. and Terracon.

Terracon appreciates the opportunity to be of continued service to CertusBank. If you have any questions or comments pertaining to the material presented herein, please contact the undersigned at (770) 623-0755 or (770) 623-9628 (facsimile).

Sincerely,

**Terracon**



Robert L. Deal, Jr.  
Senior Geologist



For: John A. Meadow  
Principal

Terracon Consultants, Inc. 2855 Premiere Parkway Duluth, Georgia 30097  
P [770] 623 0755 F [770] 623 9628 terracon.com

Geotechnical ■ Environmental ■ Construction Materials ■ Facilities

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Appendix B	Site Photographs
Appendix C	Soil Boring Logs
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**LIMITED SITE INVESTIGATION**  
**BANK BRANCH**  
**123 12<sup>TH</sup> STREET**  
**COLUMBUS, MUSCOGEE COUNTY, GEORGIA**  
**LOAN NO. 612005101**

**Terracon Project No. 49127375A**  
**December 17, 2012**

## **1.0 INTRODUCTION**

Terracon Consultants, Inc. (Terracon) has completed a Limited Site Investigation (LSI) at the Bank Branch property located at 123 12<sup>th</sup> Street in Columbus, Muscogee County, Georgia (site). Terracon's LSI activities were completed in general accordance with our Task Order dated November 20, 2012. Terracon recently completed a Phase I Environmental Site Assessment (ESA) of the site (Terracon Project No. 49127375 dated October 29, 2012). Terracon's ESA described the site as approximately 0.336 acres improved with an office building that was vacant at the time of the site reconnaissance. The purpose of the LSI activities was to evaluate soil and groundwater conditions at the site related to the following recognized environmental conditions (RECs) identified during the ESA.

- The site, located in downtown Columbus, has been developed for commercial use since the late 19<sup>th</sup> century. Historical resources reviewed indicate that the site was formerly developed with several retail shops, a tailor, a hair goods shop, a shoe shop, an oil and paint shop, a grocery, a seafood shop, a carriage shop, a dry cleaner, and several gasoline filling stations/automotive repair facilities from 1885 through as recently as 1968. There is potential for soil and groundwater impairment to the site as a result of former dry cleaner, gas station, and auto repair operations at the site.
- The surrounding properties have also been developed for commercial use since the late 19<sup>th</sup> century. Nearby and adjacent properties have been used as post offices, retail tenant spaces, a wood yard/wood shop, furniture repair (including painting and dyeing), dry cleaning, gasoline filling stations, and automotive sales and repair from 1885 through the present. There is potential for groundwater impairment to the site from these former facilities, including a former dry cleaner located to the east/northeast and topographically upgradient from the site, and former furniture repair (and painting and dyeing) operations conducted adjacent west of the site.

Terracon has performed an LSI at the site and this report presents the results of the investigation.

The location of the site is illustrated on Exhibit 1/Appendix A, Topographic Vicinity Map. The general layout of the site and the boring locations are illustrated on the Boring Location Map,

## Limited Site Investigation

Bank Branch ■ Columbus, Georgia

December 17, 2012 ■ Terracon Project No. 49127375A

# Terracon

Exhibit 2/Appendix A. Photographs of the site are presented in Appendix B. Soil boring logs are presented in Appendix C. Laboratory analytical reports and supporting documents are presented in Appendix D.

### 1.1 Standard of Care

Terracon's services were performed in a manner consistent with generally accepted practices of the profession undertaken in similar studies in the same geographical area during the same time period. Terracon makes no warranties, either express or implied, regarding the findings, conclusions or recommendations. Please note that Terracon does not warrant the work of laboratories, regulatory agencies or other third parties supplying information used in the preparation of the report. These LSI services were performed in accordance with the scope of work agreed with you, our client, as reflected in our proposal and were not restricted by ASTM E1903-97.

### 1.2 Additional Scope Limitations

Findings, conclusions and recommendations resulting from these services are based upon information derived from the on-site activities and other services performed under this scope of work; such information is subject to change over time. Certain indicators of the presence of hazardous substances, petroleum products, or other constituents may have been latent, inaccessible, unobservable, nondetectable or not present during these services, and we cannot represent that the site contains no hazardous substances, toxic materials, petroleum products, or other latent conditions beyond those identified during this LSI. Subsurface conditions may vary from those encountered at specific borings or wells or during other surveys, tests, assessments, investigations or exploratory services; the data, interpretations, findings, and our recommendations are based solely upon data obtained at the time and within the scope of these services.

### 1.3 Reliance

This ESA report has been prepared for the exclusive use of CertusBank N.A. (client) and any authorization for use or reliance by any other party (except a governmental entity having jurisdiction over the site) is prohibited without the express written authorization of the client and Terracon. Any unauthorized distribution or reuse is at the client's sole risk. Notwithstanding the foregoing, reliance by authorized parties will be subject to the terms, conditions, and limitations stated in the proposal, LSI report, and the Supplement to Agreement for Services between Terracon and the client. The limitation of liability defined in the Supplement to Agreement for Services is the aggregate limit of Terracon's liability to the client and all relying parties unless otherwise agreed in writing.

## Limited Site Investigation

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## 2.0 SAMPLE COLLECTION

Terracon's scope of work called for the advancement of two borings at the site. Borings were advanced to a depth sufficient to encounter groundwater, which was 35 feet below ground surface (bgs). Boring B1 was advanced in the vicinity of former USTs identified in historic maps of the site and was located in the southern portion of the site. Boring B2 was advanced in the vicinity of a former battery repair area identified in historic maps of the site and was located in the northern portion of the site.

Soil boring locations are illustrated on Exhibit 2 in Appendix A.

### 2.1 Soil Sample Collection

Soil borings were advanced using hand auger drilling equipment and truck-mounted direct push or Geoprobe® drilling equipment. Soil samples were collected continuously at one-foot intervals using hand auger drilling equipment in the upper five feet of soil to avoid breakage of subsurface utility lines. Beneath five feet in depth, soil samples were collected at five foot intervals using direct push or Geoprobe® drilling equipment. Soil samples were collected in unsaturated soil and visually observed for geologic logging purposes. Soil characteristics such as soil type, color, moisture, consistency, odor, and plasticity were recorded on soil boring logs. Soil samples were field-screened using an organic vapor analyzer (OVA) to detect the presence of volatile organic vapors (VOVs).

Soils encountered during drilling consisted of sand. Please refer to Appendix C for soil boring logs. Petroleum odors, stained soil, and elevated levels of VOVs were observed in soil from boring B1 between 25 and 30 feet bgs. Obvious indicators of impact, such as staining, odors, or elevated levels of VOVs, were not observed in soil from other borings during drilling. Unstabilized depth to groundwater was measured between 25.02 feet bgs (B2) and 25.27 feet bgs (B1).

One soil sample was submitted for laboratory analysis from each boring, sample B1 1B from boring B1 and sample B2 1B from boring B2. Both samples were collected from approximately 3 to 4 feet bgs. Soil samples selected for analysis are presented in Table 1, below.

**Table 1: Soil Samples Selected for Analysis**

Soil Boring	Depth Collected (feet bgs)	Sample Name
B1	3 to 4	B1 1B
B2	3 to 4	B2 1B

Notes:

bgs – below ground surface

## Limited Site Investigation

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December 17, 2012 ■ Terracon Project No. 49127375A



Soil samples were analyzed in accordance with the laboratory analytical program in Section 3.0.

Drilling equipment and other non-dedicated sampling equipment was decontaminated using a Liquinox®/water wash and scrubbing, followed by a distilled water rinse.

### 2.2 Groundwater Sample Collection

Upon completion of soil sampling activities, all borings were converted to temporary groundwater monitoring wells (temporary wells) through the insertion of 1-inch diameter polyvinyl chloride (PVC) well casing and machine-slotted well screen materials.

PVC temporary well screen was covered with a filter fabric ("filter sock") and the filter sock was secured to the well casing using a plastic wire tie. The borehole annulus was filled with a pre-sieved filter pack sand to a depth of approximately two foot above the top of the screen. A bentonite seal was placed in the borehole annulus above the sand filter pack to the surface. A slip cap was placed on the top of the well casing.

Since the laboratory analytical program called for the analysis of metals samples, the turbidity of the purge water from each well was monitored during purging with an electronic turbidimeter and recorded. Final turbidity measurements made prior to sample collection were 19.0 nephelometric turbidity units (ntu) for sample B1 and 10.0 ntu for sample B2. Groundwater samples were analyzed in accordance with the laboratory analytical program in Section 3.0.

All sampling equipment was decontaminated after each sampling effort using a non-phosphate soap wash followed by a potable water rinse.

At the conclusion of site activities, each well was covered with an orange safety cone and temporary wells were left in place pending receipt of analytical results.

## 3.0 LABORATORY ANALYTICAL PROGRAM AND RESULTS

### 3.1 Laboratory Analytical Program

Soil and groundwater samples were submitted to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for analysis. Soil samples were analyzed for volatile organic compounds (VOCs) by EPA Method 8260 and polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8270. All groundwater samples were analyzed for VOCs by EPA Method 8260 and PAHs by EPA Method 8270. Groundwater sample B2 was also analyzed for total RCRA Metals by EPA Methods 6010 and 7470. Soil and groundwater samples were analyzed on a standard five-day reporting schedule.

**Limited Site Investigation**

Bank Branch ■ Columbus, Georgia

December 17, 2012 ■ Terracon Project No. 49127375A



**3.2 Soil Analytical Results**

Several PAH compounds were detected in one soil sample. VOCs were not detected above laboratory reporting limits in soil samples analyzed. A summary of detected compounds in soil is presented in Table 2, below. Complete laboratory analytical results are presented in Appendix D.

Limited Site Investigation

Bank Branch ■ Columbus, Georgia

December 17, 2012 ■ Terracon Project No. 49127375A



Table 2: Summary of Detected Compounds in Soil

Soil Sample	Depth Collected (ft bgs)	Compound Reported in mg/kg						
		Phenanthrene	Fluoranthene	Pyrene	Benzo (a) anthracene	Chrysene	Benzo (b) fluoranthene	Benzo (a) pyrene
B1 1B	3 to 4	0.87	2.4	1.7	0.61	0.91	1.0	0.53
B2 1B	3 to 4							
Regulatory Threshold		NE	NE	NE	NE	NE	NE	NE

Notes:

mg/kg – milligrams per kilogram or parts per million

Blank squares in table indicate that result for compound listed was below laboratory reporting limit (BRL)

NE – not established; threshold for this compound has not been established by the EPD USTMP for site conditions. Terracon assumes that the nearest water body to site is >500 feet away and that there are no public or private drinking water wells within 500 feet of the site. If these assumptions are valid then thresholds are accurate. A well survey should be performed to verify surface water and groundwater well conditions.

**Bold results exceed applicable thresholds**

## Limited Site Investigation

Bank Branch ■ Columbus, Georgia

December 17, 2012 ■ Terracon Project No. 49127375A



### 3.3 Groundwater Analytical Results

Total barium, several VOCs, and several PAHs were detected above laboratory reporting limits in groundwater samples tested. A summary of detected compounds in groundwater is presented in Table 3, below. Complete laboratory analytical results are presented in Appendix D.

**Table 3: Summary of Detected Compounds in Groundwater**

Compound Reported In ug/L	Groundwater Sample		Regulatory Threshold
	B1	B2	
Barium	NT	0.176*	DL
Chloroform	<b>6.8</b>		DL
Cyclohexane	64		NE
Ethylbenzene	32		<b>1,000**</b>
Isopropyl benzene	27		NE
Xylenes	174		<b>10,000**</b>
Methylcyclohexane	180		NE
Naphthalene	15		NE
1-methylnaphthalene	14		NE
2-methylnaphthalene	31		NE

**Notes:**

ug/L – micrograms per liter or ppb

\*Result in milligrams per liter (mg/L) or ppm

Blank squares in table indicate that result for compound listed was below laboratory reporting limit (BRL)

Applicable thresholds from Georgia Rules for Hazardous Site Response, Chapter 391-3-19-.04(3)(a) except \*\* observed by Georgia UST Management Program (strictest threshold listed).

NE – not established

NT – not tested for this constituent

DL – any detectable concentration exceeds threshold

**Bold results exceed applicable thresholds**

## 4.0 FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

This investigation was performed in general accordance with our Task Order dated November 20, 2012. The scope of work was designed to investigate potential impacts to site soil and/or groundwater associated with former historical on and off-site operations.

### 4.1 Findings

Soils encountered during drilling consisted of sand. Petroleum odors, stained soil, and elevated levels of VOVs were observed in soil from boring B1 between 25 and 30 feet bgs. Obvious indicators of impact, such as staining, odors, or elevated levels of VOVs, were not observed in soil from other borings during drilling. Unstabilized depth to groundwater was measured between 25.02 feet bgs (B2) and 25.27 feet bgs (B1).

## Limited Site Investigation

Bank Branch ■ Columbus, Georgia

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# Terracon

Several PAH compounds including phenanthrene, fluoranthene, pyrene, benzo(a)anthracene, chrysene, benzo(b)fluoranthene, and benzo(a)pyrene, were detected in one soil sample. VOCs were not detected above laboratory reporting limits in soil samples analyzed.

Total barium, several VOCs (chloroform, cyclohexane, ethylbenzene, isopropyl benzene, xylenes, and methylcyclohexane), and several PAHs (naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene) were detected above laboratory reporting limits in groundwater samples tested.

## 4.2 Conclusions

Detectable concentrations of the petroleum constituents phenanthrene, fluoranthene, pyrene, benzo(a)anthracene, chrysene, benzo(b)fluoranthene, and benzo(a)pyrene were noted in soil samples analyzed. These compounds are all petroleum-based compounds and components of the motor fuel gasoline. As such, these compounds are exempt from regulation by the EPD Hazardous Waste Management Branch (HWMB) and their presence in soil is regulated by the EPD Underground Storage Tank Management Program (USTMP). The EPD USTMP has not established soil thresholds for several of these compounds, including benzo(a)anthracene, fluoranthene, and pyrene, so the presence of these compounds in site soil does not create a reporting obligation to EPD. For the compounds phenanthrene, chrysene, benzo(b)fluoranthene, and benzo(a)pyrene, EPD has established soil thresholds under certain site conditions. If a surface water body or a well is present within 500 feet of the site, then there are soil thresholds that apply for the compounds phenanthrene, chrysene, benzo(b)fluoranthene, and benzo(a)pyrene. While a review of the topographic map confirms that there are no surface water bodies within 500 feet of the site, a water well survey would be required to confirm that there are no public or private drinking water wells within 500 feet.

Total barium, several VOCs (chloroform, cyclohexane, ethylbenzene, isopropyl benzene, xylenes, and methylcyclohexane), and several PAHs (naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene) were detected above laboratory reporting limits in groundwater samples tested. The compounds cyclohexane, ethylbenzene, isopropyl benzene, xylenes, methylcyclohexane, naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene are petroleum-based compounds and components of motor fuels. As such, these compounds are exempt from regulation by the HWMB and are regulated by the USTMP. Thresholds for the compounds in groundwater have not been established for many of the compounds, but for those where thresholds have been established (ethylbenzene and xylenes), the concentrations identified in site groundwater are below those thresholds. Although the concentrations of ethylbenzene and xylenes did not exceed the strictest potentially applicable threshold, the federal maximum contaminant level (MCL), according to EPD USTMP rules and federal UST rules, the presence of detectable ethylbenzene and xylenes in site groundwater constitutes a release and must be reported to the USTMP.

## Limited Site Investigation

Bank Branch ■ Columbus, Georgia

December 17, 2012 ■ Terracon Project No. 49127375A

**Terracon**

Chloroform was detected in site groundwater. Chloroform is regulated by the EPD HWMB under EPD Hazardous Waste Rules. According to Chapter 391-3-19-.04(3)(a) of those rules, a release is identified as any concentration of regulated substances that causes the concentration in groundwater to exceed the naturally-occurring background concentration. Chloroform is considered by the EPD to be a non-naturally occurring compound. As a result, the reported presence of chloroform in groundwater is to be considered indicative of a release and is therefore required to be reported to EPD. This reporting obligation applies to the owner of the site.

Upon receipt of the Release Notification Form, EPD will determine if a Reportable Quantity Release (requiring additional investigation) has occurred and if the site will be listed on the Hazardous Sites Inventory (HSI) list. Listing of a site on the HSI list is dependent upon the results of screening conducted by EPD using the Reportable Quantities Screening Method (RQSM), which uses site-specific and surrounding area land-use information to determine numerical values which are input to formulas that compute a Groundwater Pathway score (for releases detected in groundwater) and an On-Site Pathway score (for releases detected in soil). If either the Groundwater Pathway score or the On-Site Pathway score exceeds respective threshold values, the site may be listed on the HSI. Additional subsurface investigation will be required for sites listed on the HSI. However, based on the concentration of chloroform detected in site groundwater, it is unlikely that the detected concentration of chloroform in groundwater will result in the listing of the site on the HSI.

### 4.3 Recommendations

Based on the findings of this assessment, Terracon recommends that CertusBank provide the current property owner with a copy of this report so that the current property owner can fulfill reporting obligations to GEPD for the chloroform identified in site groundwater by completing and submitting a Hazardous Site Response Release Reporting/Notification form to GEPD. At your request, Terracon can complete and submit this form to GEPD and conduct the necessary water well/sensitive receptor survey on behalf of the property owner. It should be noted that the Notification form must be signed by the property owner. As noted above, since chloroform was detected at a concentration below the MCL, it is unlikely (and a potential mathematical impossibility) that the detected concentration of chloroform in groundwater will result in the listing of the site on the HSI.

Regarding the petroleum release, due to the low concentrations of ethylbenzene and xylenes detected in groundwater (below the MCLs), and low probability of the presence of a surface water body or drinking water well within 500 feet of the site, in Terracon's opinion, the USTMP likely will not require any additional investigation or corrective action at the site. Although this is the likely future scenario, according to GEPD USTMP rules and federal UST rules, the presence of detectable petroleum constitutes a release and must be reported to the USTMP. Terracon recommends that CertusBank provide the current property owner with a copy of this report so that the current property owner can fulfill reporting obligations to the

### **Limited Site Investigation**

Bank Branch ■ Columbus, Georgia

December 17, 2012 ■ Terracon Project No. 49127375A

The logo for Terracon, featuring the word "Terracon" in a bold, sans-serif font. The letter "T" is significantly larger and more prominent than the other letters.

GEPD USTMP for the petroleum constituents identified at the site. In order to verbally inform the GEPD USTMP of the petroleum constituents identified at the site, the owner can contact the GEPD USTMP at 404-362-2687. Additionally, a copy of our report can be sent to the address below:

Environmental Protection Division  
Underground Storage Tank Management Program  
4244 International Parkway, Suite 104  
Atlanta, Georgia 30354

Terracon is experienced with the necessary GEPD notification processes; therefore, at your request, and if permission is granted by the property owner, Terracon can assist with the required notification to the GEPD. Based on Terracon's experience with the regulatory notification process, the GEPD HWMB will likely prepare a letter stating that the site is not eligible to list on the HSI within 90 days of receipt of the notification documents, and additional investigation will not be required. GEPD USTMP will likely provide a letter stating that no additional investigation is warranted within 60 days of notification/document submittal. It should be noted, that these are Terracon's opinions, and official determination regarding additional investigation is made by the GEPD.

VIA HAND DELIVERY

**RECEIVED**  
Georgia EPD



Geotechnical  
Environmental  
Water Resources  
Ecological

March 8, 2013

MAR 8 2013

**Response and Remediation Program**

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

**Re: HSRA Release Notification  
1551 Perry Boulevard, NW  
Atlanta, Georgia 30318**

Dear Mr. Williams,

Please find enclosed one copy of the Release Notification for the above referenced site. GEI Consultants, Inc. (GEI) is submitting this Release Notification on behalf of Hudgins and Company, Inc. (Hudgins) who is the land owner and also signed the attached Notification.

The current tenant, Rand Recycling, Inc. (Rand) is interested in purchasing the property from Hudgins. Rand hired Logic Environmental, Inc. (Logic) to conduct a Phase II Soil & Groundwater Assessment (S&GA) at the above referenced property. During the Phase II S&GA, Logic collected soil and groundwater samples from various locations on the site. The Phase II S&GA prepared by Logic was delivered to Hudgins on February 8, 2013. The attached Release Notification includes the information prepared and data collected by Logic during the Phase II S&GA.

If you have questions or require additional information, please feel free to call either of the undersigned at (404) 592-0050.

Sincerely,

A handwritten signature in black ink, appearing to read "James E. Laubenthal".

James E. Laubenthal  
Senior Program Manager

A handwritten signature in black ink, appearing to read "Scott M. Keating".

Scott M. Keating  
Vice President/Branch Manager

Attachments

1551 Perry Boulevard NW  
Atlanta, Georgia 30318

**Attachment 1**  
**Release Notification/Reporting Form**

6068.

# 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:	17 0224 LL0393	Acreage	5.5	
4	Site or Facility Name	Rand Recycling, Inc.			
5	Site Street Address	1551 Perry Boulevard NW			
6	Site City	Atlanta	County	Fulton	Zip 30318
7	Property Owner	Hudgins & Company, Inc.			
8	Property Owner Mailing Address	640 North Avenue NW			
9	Property Owner City	Atlanta	State	GA	Zip 30318
10	Property Owner Telephone No.	404-523-5003			
11	Site Contact Person	James Hudgins	Title	President	
12	Site Contact Company Name	Hudgins & Company, Inc.			
13	Site Contact Mailing Address	640 North Avenue NW			
14	Site Contact City	Atlanta	State	GA	Zip 30318
15	Site Contact Telephone No.	404-523-5003			
16	Facility Operator Contact Person	Damon Rose	Title	Owner	
17	Facility Operator Company Name	Rand Recycling, Inc.			
18	Facility Operator Mailing Address	1551 Perry Boulevard NW			
19	Facility Operator City	Atlanta	State	GA	Zip 30318
20	Facility Operator Telephone No.	404-996-1349			

**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.

JD HUDGINS  
 NAME (Please type or print)

J.D. Hudgins  
 SIGNATURE

Pres/CEO  
 TITLE

3-8-113  
 DATE

Revised May 2008

## PART II -- RELEASE INFORMATION

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

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

Unknown

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

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).**

The known environmental condition is based on a Phase II Soil & Groundwater Assessment (December 28, 2012).

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

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

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

The site is completely fenced and gated, and during non-business hours completely inaccessible and monitored by an infrared security system.

**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.

All of the soil sample locations with concentrations that exceed the notification criteria are at depth, and/or covered by concrete.

There is a 6-inch concrete slab that covers much of the site, and is over all but two of the soil sample locations. The size of the concrete slab at the site has been expanded by the current tenant since the soil sampling event. All of the soil sample depths range from 12-inches below ground surface (bgs) to 14-feet bgs. The overburden of soil is considered compacted fill.

## PART II -- RELEASE INFORMATION

(Continued)

Page 2 of 4

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: The Bridge Family Center

Address: 1559 Johnson Road NW Atlanta, GA 30318 - (404) 792-0070

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

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

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

Name: Unknown. Well identification via USGS website (Well ID: 334710084241901). See attached USGS survey information.

Address: Unknown. See on-line map printed from USGS website showing search radii and the reported well location.

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

Yes       No

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

## REQUIRED ATTACHMENTS

### 9. SITE SUMMARY

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

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

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

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

Revised May 2008





1551 Perry Boulevard NW  
Atlanta, Georgia 30318

**Attachment 2**  
**Property Description and Tax Parcel Map**

## **Attachment 2**

### **Property Description and Summary 1551 Perry Boulevard NW Atlanta, GA 30318**

The site is located at 1551 Perry Boulevard NW, Fulton County, Georgia and is approximately 400 feet northwest of the intersection of Perry Boulevard and Marietta Road NW. The property is owned by Hudgins & Company, Inc. (Hudgins), who purchased the property in 1960. The property is currently occupied by Rand Recycling, Inc. (Rand), a metal recycler. Rand buys, sorts, and resells small units of recyclable metal, such as cans, appliances, wire, and machine parts. The only operations performed on site are sorting and dismantling tasks, such as wire stripping.

This site is approximately 5.5 acres and is bounded by a large rail yard to the north and east, a countertop manufacturer to the southeast, Perry Boulevard and then a family counseling center to the southwest, and an undeveloped wooded area to the west/northwest. There is currently one building on site, approximately 3,360 square feet in size. There is also one construction trailer used as a scale house, concrete slabs covering much of the site, recycling debris piles, and a truck scale.

The most recent investigations were performed in December 2012 by Logic Environmental, Inc. (Logic), which conducted a Phase II Soil & Groundwater Assessment on behalf of Rand. Analytical results from this investigation indicate that select soil samples collected from various depths below ground surface (bgs) contained regulated constituent concentrations greater than the corresponding Notification Concentrations as listed in Appendix I of the Georgia Rules of Hazardous Site Response. One soil sample collected by hand auger (12-inches bgs) contained lead at a concentration greater than the corresponding notification concentration. Four other soil samples, collected through direct push technology, (ranging from 9 to 14 feet below ground surface) contained barium, lead, and silver at concentrations greater than the corresponding notification concentrations. No regulated substances were detected in the groundwater samples collected at the site. Presented in Attachment 4 is a copy of Logic's Phase II S&GA report cover page, analytical data tables, site map, USGS topographic map, and laboratory analytical results.

1551 Perry Boulevard NW  
 Atlanta, Georgia 30318  
 Release Notification

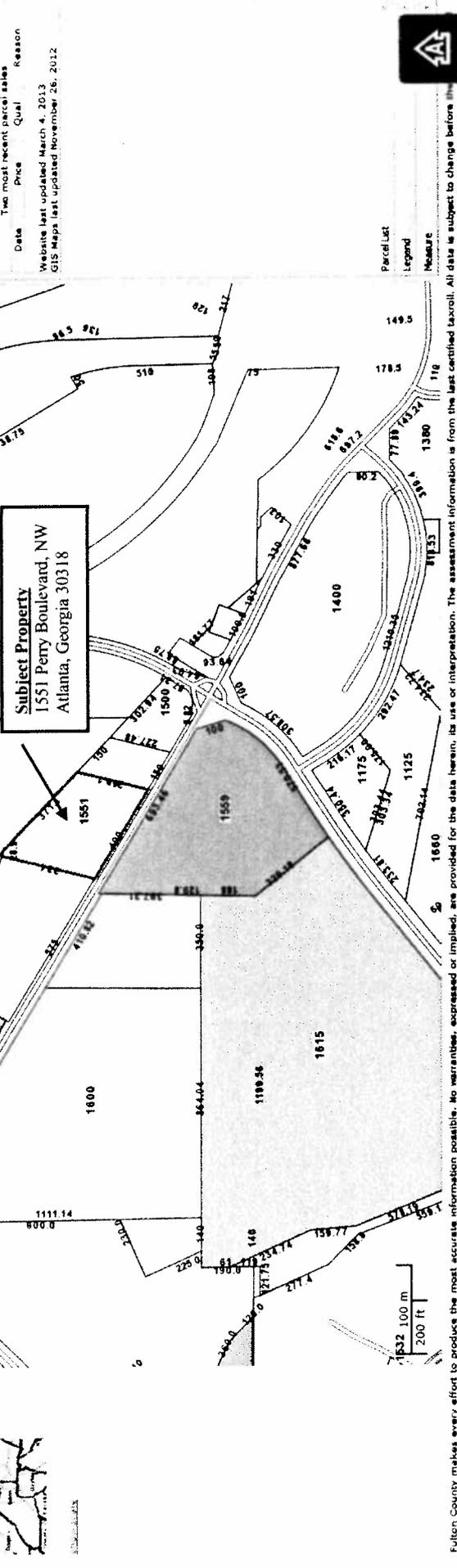
**Fulton County Tax Parcel Map**

Fulton County Parcel Maps - Windows Internet Explorer  
 http://www.fultoncountyga.gov/parcel\_maps/parcel\_sales/parcel\_sales\_streetfront\_taxes.dms

Additional Options - Search Parcel Print Area Tool Center On Parcel Zoom To Parcel  
 Favorites Suggested Sites Web Site Utility

Fulton County Parcel Maps  
 Zoom In Zoom Out Home Refresh Map Info Get Help

Available Layers  
 Parcels  
 Dimensions  
 Parcel Numbers  
 Address #  
 Yearly Sales  
 Roads  
 Flood Map  
 Lakes & Rivers  
 Aerial Photos



Selected Parcel: 17-0224-100283 (Click for Card)  
 Property Class: 14  
 Taxing District (OSV): 0  
 Acreage: 0  
 Physical Address: 1551 PERRY BLVD, HUDGINS & CO INC, ATLANTA, GA 30318, USA  
 Owner: HUDGINS & CO INC, ATLANTA, GA 30318  
 Land Value: \$ 237,300  
 Improvement Value: 0  
 Accessory Value: 0  
 Total Value: \$ 237,300  
 Improvements on Parcel: 1  
 Total Improvement Area (sq ft): 0

Two most recent parcel sales  
 Data Price Qual Reason

Website last updated: March 4, 2013  
 GIS Maps last updated: November 26, 2012

Parcel List Legend Measure

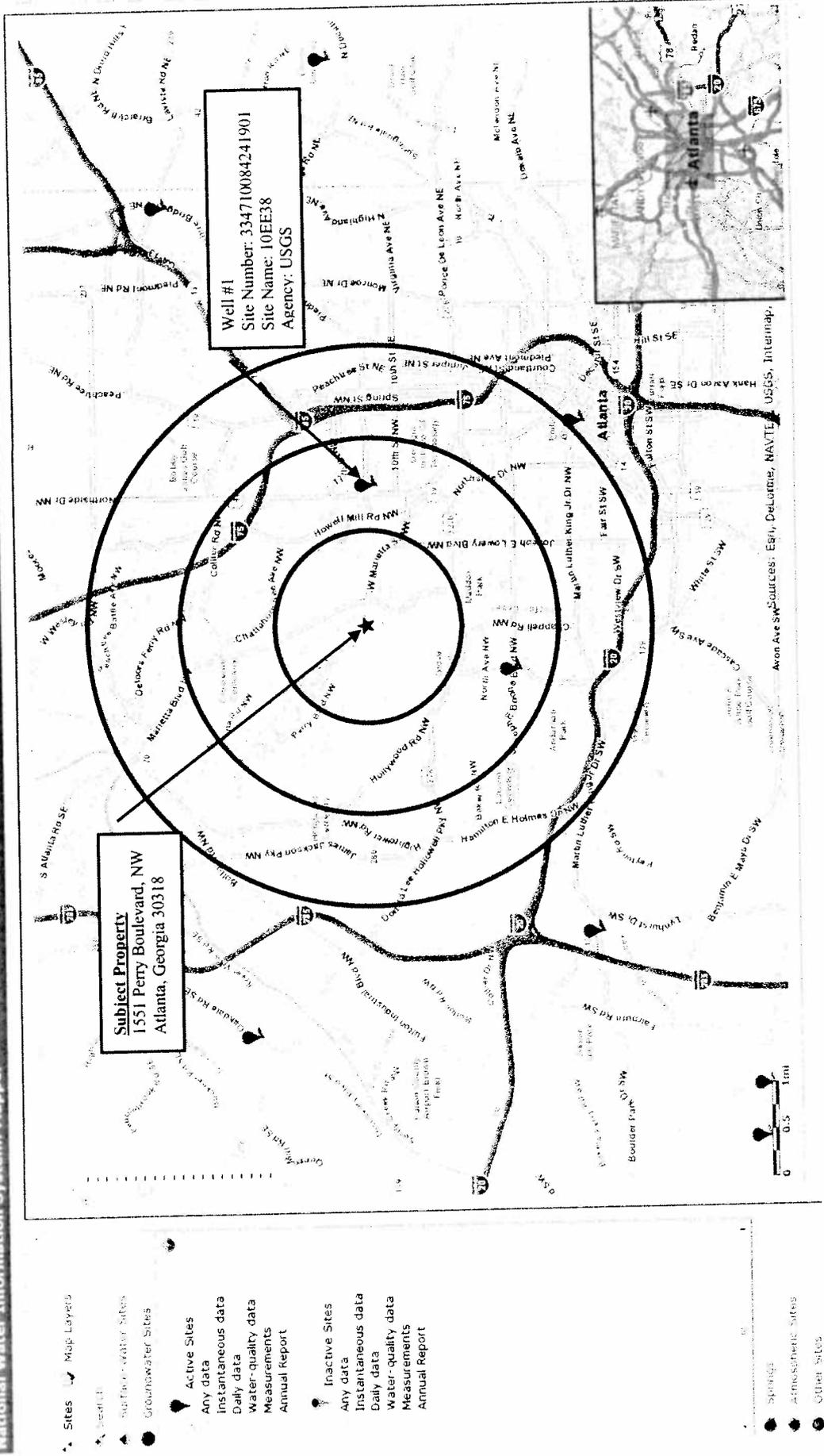
Fulton County makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified taxroll. All data is subject to change before the next taxroll.

1551 Perry Boulevard NW  
Atlanta, Georgia 30318

**Attachment 3**  
**Water Well Survey**

1551 Perry Boulevard NW  
 Atlanta, Georgia 30318  
 Release Notification

USGS Water Well Survey – Active Sites



Well #1 -- closest water well to site

USGS 334710084241901 10EE38



**National Water Information System: Web Interface**  
USGS Water Resources

USGS Home  
Contact USGS  
Search USGS

Data Category: Site Information Geographic Area: United States GO

Available data for this site SUMMARY OF ALL AVAILABLE DATA GO

### USGS 334710084241901 10EE38

#### Well Site

#### DESCRIPTION:

Latitude 33°47'10", Longitude 84°24'19" NAD27  
Fulton County, Georgia , Hydrologic Unit 03130001  
Well depth: 24 feet  
Hole depth: 24 feet  
Land surface altitude: 910 feet above NGVD29.  
Well completed in "Piedmont and Blue Ridge crystalline-rock aquifers" (N400PDMBRX) national aquifer.  
Well completed in "Saprolite" (110SPRL) local aquifer

#### AVAILABLE DATA:

Data Type	Begin Date	End Date	Count
<a href="#">Field groundwater-level measurements</a>	1995-05-16	1995-07-13	2
<a href="#">Field/Lab water-quality samples</a>	1995-07-13	1995-07-13	2

#### OPERATION:

Record for this site is maintained by the USGS Georgia Water Science Center  
Email questions about this site to [Georgia Water Science Center Water-Data Inquiries](#)



# AEI Consultants

3880 S. Bascom Ave., Suite 108 San Jose, CA 95124

Environmental & Engineering Services

Tel: 650.303.3856 Fax: 650.887.0439

March 4, 2013

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

RECEIVED  
Georgia EPD

MAR 11 2013

Response and Remediation Program

**Subject: Release Notification/Reporting Form**  
20 Courthouse Square  
Cleveland, Georgia 30528  
AEI Project No. 310848

To whom it may concern:

Please find the Release Notification Reporting Form for the referenced address attached. In October 2012, a Phase II Limited Site Investigation was completed at this property to determine impacts to the property resulting from off-site dry-cleaning. Four soil and two groundwater samples were obtained. Analytical results revealed that tetrachloroethene is present in groundwater at 5.43 and 5.81 micrograms/liter.

AEI has completed a review of historical on-site operations and has identified several commercial business. The subject property has not been included on any RCRA database for the generation of chlorinated solvent wastes. Due to the lack of on-site chlorinated solvent uses, and the absence of PCE in the soils, AEI believes the PCE concentrations to have originated from off-site (from the up-gradient Cleveland Cleaners). Please see the enclosed packet for additional information.

As the reported levels are above "naturally occurring concentrations", the attached Release Notification Reporting form has been prepared for your review.

Please contact me if you have any questions.

Sincerely,



Angela Utz  
National Client Manager  
**AEI Consultants**

6069

# 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

MAR 11 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)	N/A			
3	Tax Map and Parcel ID Number:	C01C089	Acreage	0.147	
4	Site or Facility Name				
5	Site Street Address	20 Courthouse Square			
6	Site City	Cleveland	County	White	Zip 30528
7	Property Owner	Mike Snider			
8	Property Owner Mailing Address	PO Box 582			
9	Property Owner City	Cleveland	State	GA	Zip 30528
10	Property Owner Telephone No.	706-878-7964			
11	Site Contact Person	Mike Snider	Title	Owner	
12	Site Contact Company Name				
13	Site Contact Mailing Address	PO Box 582			
14	Site Contact City	Cleveland	State	GA	Zip 30528
15	Site Contact Telephone No.	706-878-7964			
16	Facility Operator Contact Person	Mike Snider	Title	Owner	
17	Facility Operator Company Name				
18	Facility Operator Mailing Address	PO Box 582			
19	Facility Operator City	Cleveland	State	GA	Zip 30528
20	Facility Operator Telephone No.	706-878-7964			

21. CERTIFICATION --I certify under penalty of law that I am the owner of the real property described in this Release Notification and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME (Please type or print)

SIGNATURE

TITLE

DATE

Mike Snider  
*Mike Snider*

Owner  
2/26/2013

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

The suspected source of the release is from a nearby dry cleaners, Cleveland Cleaners, located 120 feet northwest 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 quantity of material release is unknown. According to historical information, the dry cleaner operated for at least 28 years and is currently closed.

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 was completed on the property, consisting of three borings via direct-push technology. A total of four soil samples and two groundwater samples were collected and analyzed for VOCs-EPA Method 8260B and PAHs-EPA Method 8270. 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.

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 8

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: Harold Leroy Minatre

Address: 85 West Jarrard Street

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: City of Cleveland

Address: Latitude 34.59898 Longitude -83.76045

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

Yes       No

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

## REQUIRED ATTACHMENTS

### 9. SITE SUMMARY

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

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

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

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

Revised May 2008





## **Site Summary**

### **20 Courthouse Square in Cleveland, White County, Georgia 30528**

The 0.147-acre subject property is located on the western side of Courthouse Square in downtown Cleveland, Georgia (Figure 1). The site has been improved with a one-story, 3,320 square foot commercial building since 1970. Site tenants have been identified to include a Georgia Copiers and Digital Systems, LLC for typical retail office supply sales, and photocopy services from 1980/81 until 2012; and a former OTASCO Economy Auto Store from 1970 to 1980. These operations were not included on the regulatory databases as a RCRA generator.

Prior to the construction of the building, the property was identified to have been improved with a commercial business and possibly a residential home/hotel according to Mr. Pete Barrett; and a hardware store according to officials with the Cleveland Historical Society. Historic dry cleaning plant facilities have not been identified on-site.

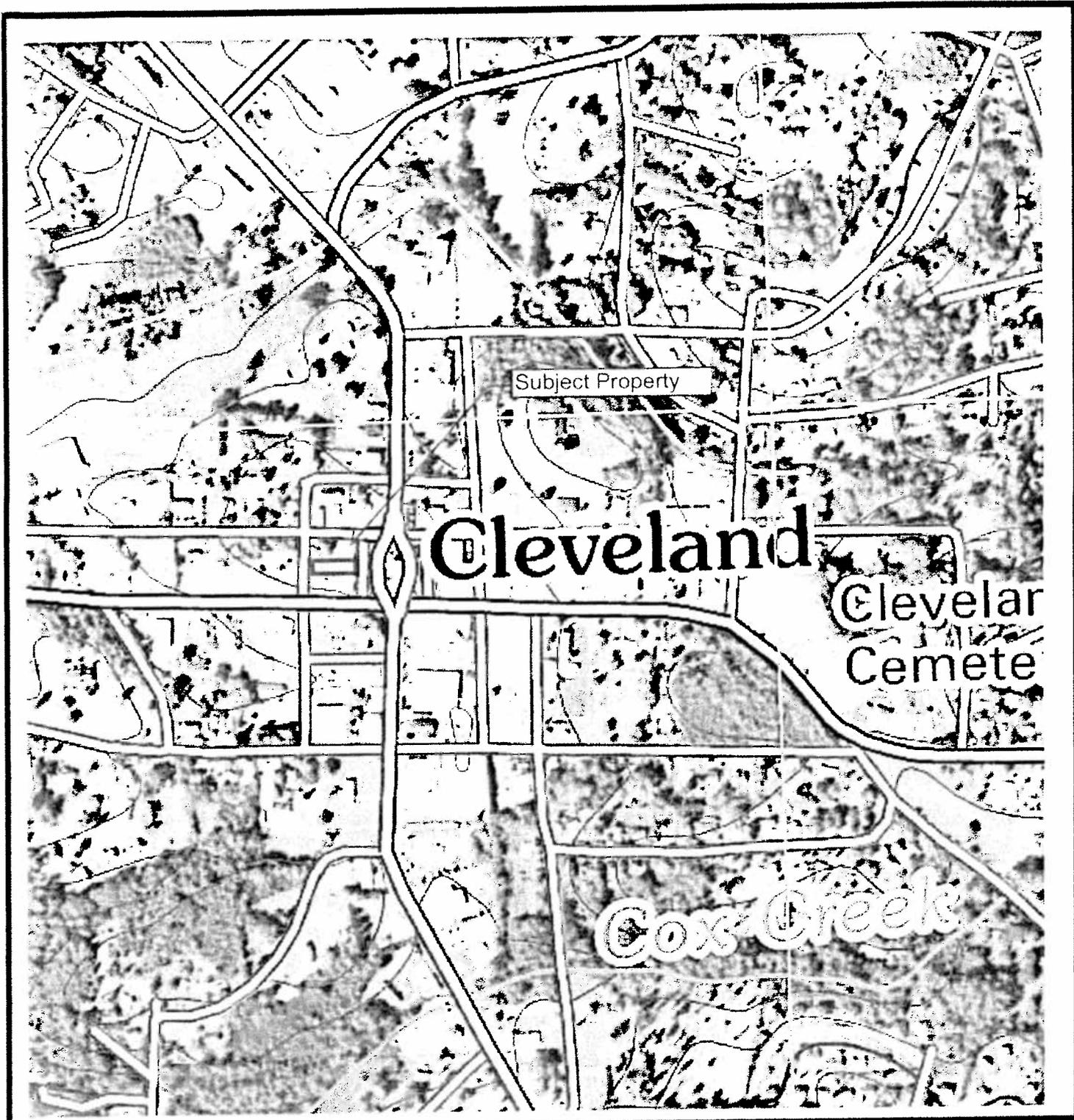
The site is located in a commercial downtown area of Cleveland, Georgia and adjacent properties have been utilized for commercial purposes, including an existing dry cleaning plant operation, Cleveland Cleaners, which was noted to be 120 feet northwest and up gradient relative to the subject property.

A Phase II Limited Site Investigation (LSI) was completed at the subject property in October 2012 which included three direct-push borings. The borings were advanced on the subject property to depths of 20 and 36 feet (Figure 2). Four soil and two groundwater samples were collected. The samples were submitted for laboratory analysis of Volatile Organic Compounds (VOCS) by EPA Method 8260 and Polynuclear Aromatic Hydrocarbons (PAHs) by EPA Method 8270. Analytical results for soil identified one constituent, acetone, at 0.0384 milligrams per Kilograms, in B2 at a depth of 12-16 feet below ground surface; however, this concentration was noted to be below the GEPD Notification Concentration. Analytical results for groundwater identified tetrachloroethene (PCE) at 5.43 micrograms per liter ( $\mu\text{g/L}$ ) in B1 and 5.81  $\mu\text{g/L}$  in B2. Boring logs and the complete analytical results are attached.

Due to the presence of PCE in groundwater at levels above its "naturally occurring concentrations", AEI was asked to prepare a GPED HSRA Notification. AEI has obtained water well information through a third party provider and prepared the initial scoring. Based on our review of water well information, AEI has identified at least three municipal potable water wells to the northeast and at a distance of ~1,200 feet from the subject property. According to Mr. Tom Guy with the Cleveland Water Works, these wells are the city's main public active water supply wells.

AEI has completed a review of historical on-site operations, and has identified the site to have been occupied by various commercial businesses. The subject property has not been included on RCRA regulatory databases for the generation of chlorinated solvent wastes. Due to the lack of on-site chlorinated solvent uses, and the absence of PCE in site soils, AEI believes the PCE concentrations to have originated off-site from the up-gradient Cleveland Cleaners. AEI understands that the Cleveland Cleaners has reported a release on January 4, 2013; however, the facility has yet to be scored by the state and release notification information was not available for AEI's review.

# FIGURES



**SITE LOCATION MAP**

20 Courthouse Square, Cleveland, Georgia 30528

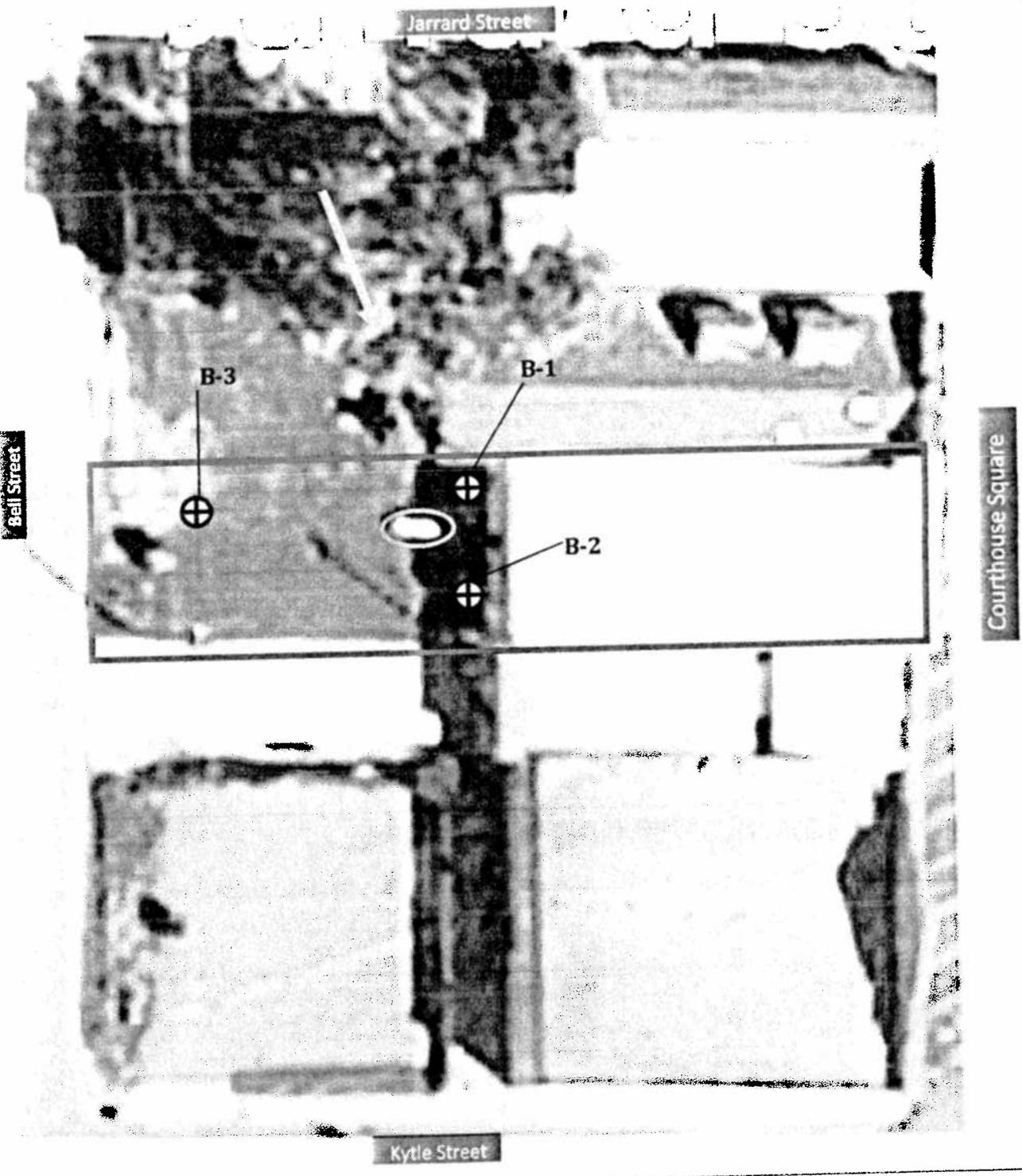


Source: USGS 7.5-Series Topographic Map  
Cleveland, Georgia, dated 2011

**FIGURE 1**

Project Number: 310848





### SITE MAP

20 Courthouse Square, Cleveland, Georgia 30528



Legend

- Direction of Groundwater flow Boring Site
- Approximate Property Boundary Propane Tank

**FIGURE 2**  
Project Number: 310848



6070

# 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

MAR 14 2013

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

**COPY**

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:	19041400110	Acreage	10.625	
4	Site or Facility Name	Macland Point Station LLC			
5	Site Street Address	1750 Powder Springs Road			
6	Site City	Marietta	County	Cobb	Zip 30064
7	Property Owner	Macland Point Station LLC			
8	Property Owner Mailing Address	11501 Northlake Drive			
9	Property Owner City	Cincinnati	State	Ohio	Zip 45249
10	Property Owner Telephone No.	(513) 554-1110			
11	Site Contact Person	Ms. Rhonda Allen	Title	Property Manager	
12	Site Contact Company Name	Macland Point Station LLC			
13	Site Contact Mailing Address	11501 Northlake Drive			
14	Site Contact City	Cincinnati	State	Ohio	Zip 45249
15	Site Contact Telephone No.	(615) 319-8649			
16	Facility Operator Contact Person	Mr. Mark Addy	Title	President	
17	Facility Operator Company Name	Macland Point Station LLC			
18	Facility Operator Mailing Address	11501 Northlake Drive			
19	Facility Operator City	Cincinnati	State	Ohio	Zip 45249
20	Facility Operator Telephone No.	(513) 554-1110			

**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.

*Macland Point Station LLC*  
 NAME (Please type or print)  
*Mark Addy, President*  
 SIGNATURE

President  
 TITLE  
 March 8, 2013  
 DATE

## PART II -- RELEASE INFORMATION

Page 2 of 5

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

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

The source of the release at the site is tetrachloroethene (PCE) dry cleaning unit which was operated at a former full service dry cleaning facility. A Phase I Environmental Site Assessment (ESA), performed in December 2012, revealed that the Oxford Cleaners operated as a full service dry cleaning facility from 1994 to approximately 2006. Phase II ESA soil sampling revealed PCE in soils beneath the location of the former dry cleaning unit in the former full service dry cleaner.

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

The date of the release is unknown. The likely release occurred in small quantities of liquid over the period that the Oxford Cleaners operated as a full service dry cleaning facility from 1994 to approximately 2006. The quantity of material released is also unknown.

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

Two Phase II ESAs were completed in December 2012 and February 2013 involving soil and groundwater sampling from soil borings and monitoring wells. PCE impacted soils were delineated at the site horizontally and vertically. PCE impacted groundwater was delineated to the north, east, and west of the site. Source removal involving soil excavation was performed in March 2013 beneath the floor of the Oxford Cleaners. Phase II ESA and Source Removal activities are described in a Prospective Purchaser Corrective Action Plan (PPCAP) provided to the Georgia Environmental Protection Division (EPD) on March 15, 2013.

**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: Soil source material removed during Source Removal activities discussed in the PPCAP submitted to the Georgia EPD on

March 15, 2013.

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

Source material removed in March 2013. Excavated area is covered with 4-inch thick concrete pad. The excavated area is located inside a building. The excavated area and surrounding soil in all directions is covered by an existing building or asphalt paved parking area.

## 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: Spring Mountain Assisted Living & Memory Care Community

Address: 1790 Powder Springs Road, Marietta, GA 30064

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: Francis Mims

Address: 1920 Green Drive, Marietta, Georgia 30064

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

Yes       No

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

## REQUIRED ATTACHMENTS

### 9. SITE SUMMARY

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

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

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

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





Site Summary  
Macland Pointe Shopping Center  
1750 Powder Springs Road  
Marietta, Georgia 30064

In conjunction with its acquisition of the Macland Pointe Shopping Center, Macland Point Station LLC (MPS) has retained Apex Companies, LLC (Apex) to conduct an environmental investigation into potential impacts from the former onsite operations of the Oxford Cleaners dry cleaning facility. Oxford Cleaners is currently a drop-off/pick-up location, but from 1994 to 2006 conducted full service dry cleaning onsite.

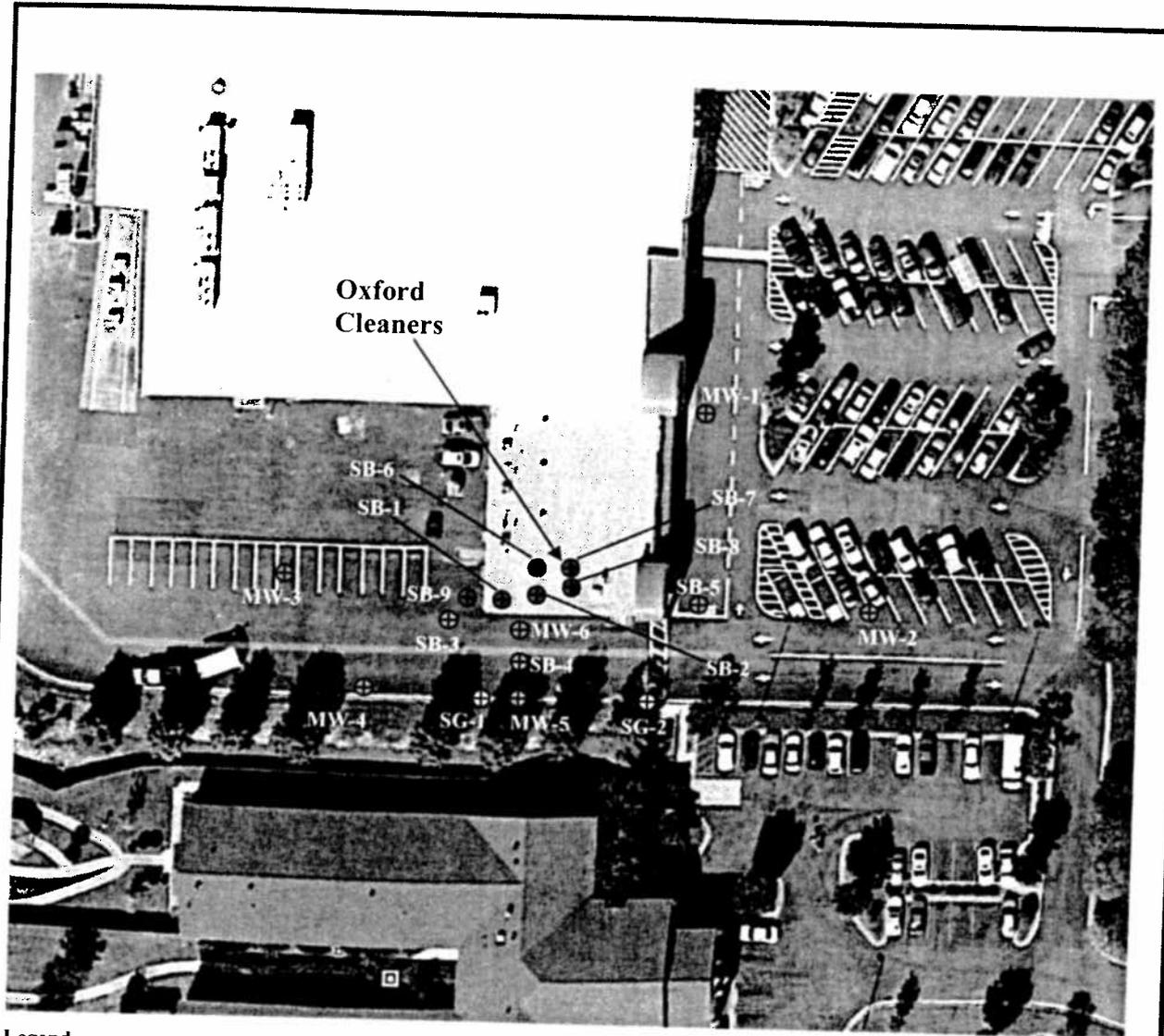
The Macland Point Station LLC (Site) occupies 10.625 acres and is located at 1750 Powder Spring Road, southwest of the intersection between Powder Springs Road and Macland Road (State Route 360) and bordered by Macland Road to the north and Powder Springs Road to the east. The Site is currently improved with a rectangular-shaped single-story commercial shopping center with a gross leasable area of 79,699 square feet. The shopping center and associated parking lot were developed in 1992.

Initial soil and groundwater sampling performed in December 2012 and February 2013 revealed slightly elevated levels of tetrachloroethene (PCE), with the highest concentrations found in groundwater samples being 24 micrograms per liter ( $\mu\text{g/L}$ ) and the highest concentrations in soil being below the notification concentration. Additional groundwater testing during the week of February 25th involved the installation of six groundwater monitoring wells surrounding the perimeter of the dry cleaner in an attempt to delineate PCE in groundwater. The highest concentration of PCE detected was 58  $\mu\text{g/L}$  in monitoring well MW-6 located just outside the south wall of the dry cleaner space. The concentration of PCE in the downgradient monitoring well, MW-4, located southwest of MW-6, was 3.2  $\mu\text{g/L}$ . Follow-up soil testing inside the dry cleaner tenant space found elevated concentrations in shallow soils below the former location of the dry cleaning unit. Figure 1 provided in Attachment A shows the location of all samples collected at the Site. The extent of soils and groundwater impacted with PCE is shown on the Soil Results Map and Groundwater Results Map provided as Figures 2 and 3 in Attachment A, respectively.

During the week of March 4, 2013, Apex performed source removal activities, excavating for offsite disposal soils from an area approximately 15 feet by 8 feet, with an average depth of 5 feet beneath the former dry cleaning unit location. The location of the source area and subsequent excavation are shown on Figure 4, provided in Attachment A. Post-excavation confirmation soil samples were collected and are shown on Figure 5, provided in Attachment A. Confirmation sample analytical results showed the highest concentration of PCE detected to be 0.082 parts per million (ppm). Consequently, Apex believes no soil concentrations remain onsite above the notification concentration of 0.18 ppm.

Contemporaneously with submittal of this notice, Macland Point Station LLC has submitted a prospective purchaser corrective action plan. In addition, following dialogue with the Environmental Protection Division, Apex anticipates conducting a pilot study for in situ chemical oxidation (ISCO) to address any residual groundwater impacts that may remain following the source removal. Apex expects to conduct the ISCO pilot study in the next 60 days with a goal of bringing groundwater into compliance with applicable risk reduction standards. The nearest private drinking water wells appear to be located to the south just under  $\frac{1}{2}$  mile from the Site. However, in light of the fact that Apex expects concentrations to meet applicable risk reduction standards before EPD completes the scoring process under the reportable quantities screening method, MPS believes no release of a reportable quantity has occurred.

The Site is bounded south by an assisted living facility, to the west by residential properties, and to the north and east by commercial and residential properties. A property survey is provided in Attachment B.



**Legend**

- = Soil Boring Locations
- ⊕ = Temporary Well Locations
- ⊕ = Soil Gas Sample Locations
- ⊕ = Monitoring Well Locations

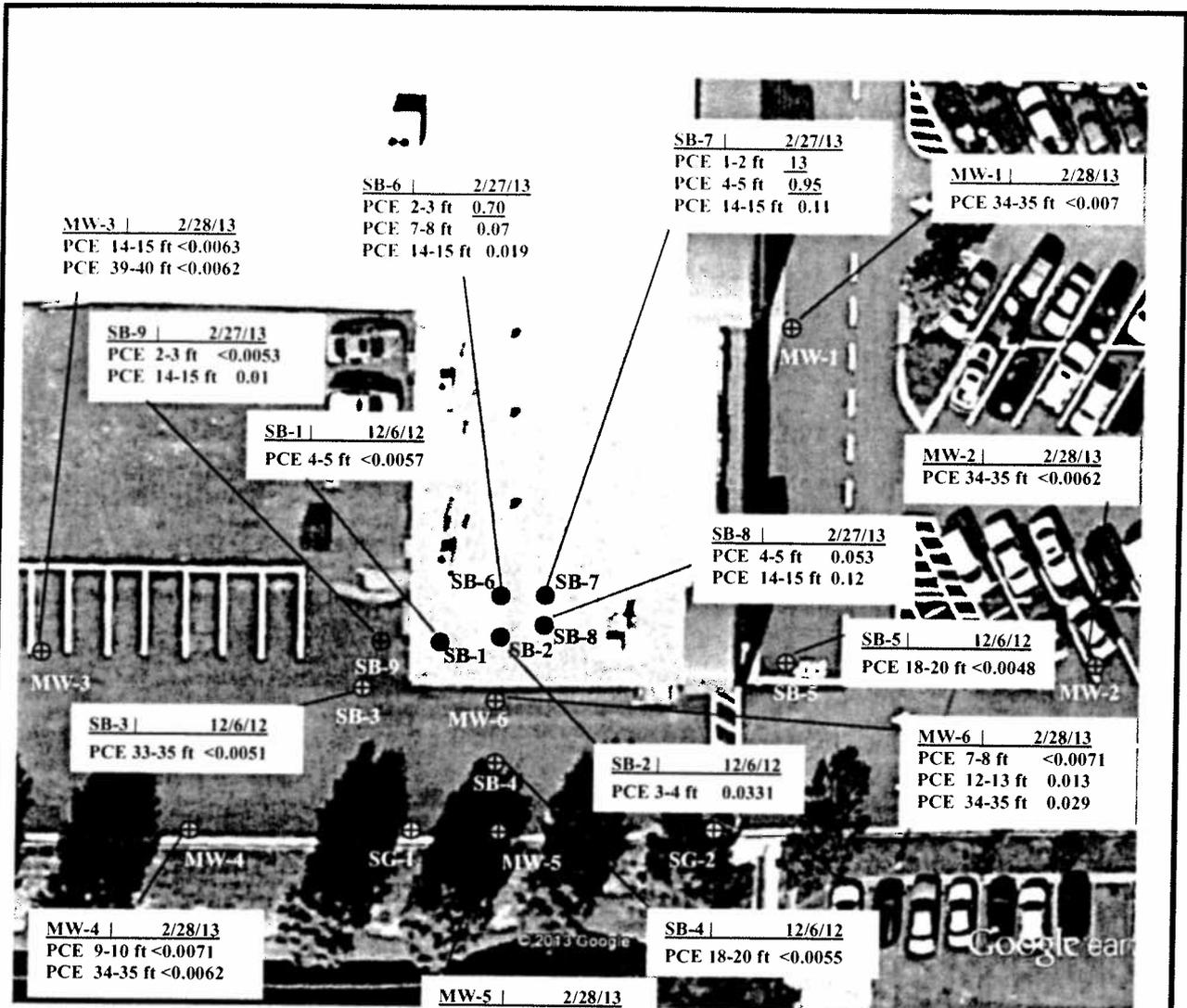
Scale: 1 inch = 70 feet



155 Tri-County Parkway, Suite 250, Cincinnati, Ohio 45246

**Macland Point Station LLC**  
 1750 Powder Springs Road  
 Marietta, GA 30064

**Figure 1: Sample Location Map**



**Legend**

- = Soil Boring Locations
- ⊕ = Temporary Well Locations
- ⊕ = Soil Gas Sample Locations
- ⊕ = Monitoring Well Locations

Scale: 1 inch = 40 feet

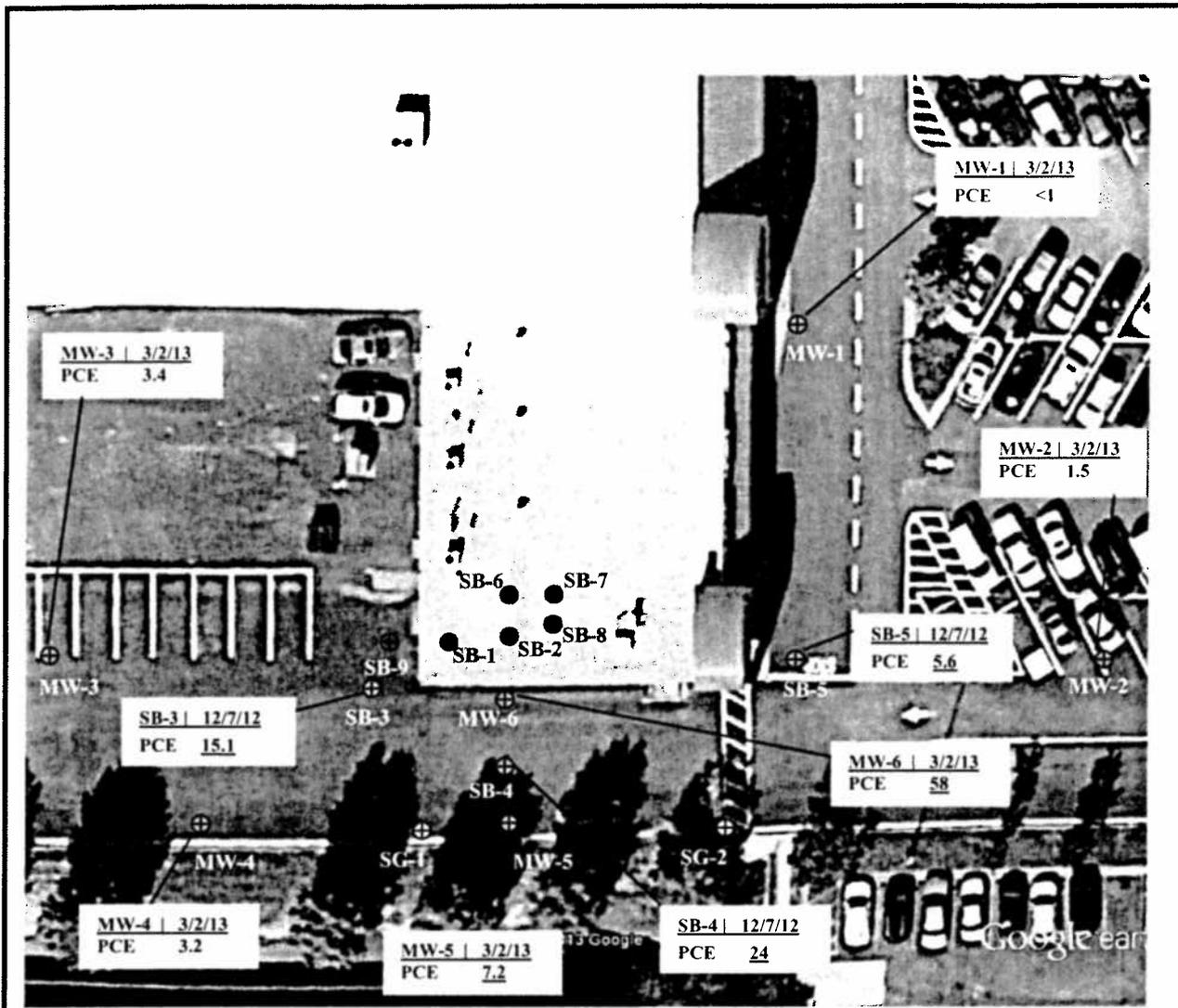
Underlined = results in parts per million (ppm) detected above Type 3 Risk Reduction Standards



155 Tri-County Parkway, Suite 250, Cincinnati, Ohio 45246

**Macland Point Station LLC**  
 1750 Powder Springs Road  
 Marietta, GA 30064

**Figure 2: Soil Results Map**



**Legend**

- = Soil Boring Locations
- ⊕ = Temporary Well Locations
- ⊕ = Soil Gas Sample Locations
- ⊕ = Monitoring Well Locations

Scale: 1 inch = 40 feet

Underlined = results in µg/L detected above Type 3 Risk Reduction Standards



 155 Tri-County Parkway, Suite 250, Cincinnati, Ohio 45246	<b>Macland Point Station LLC</b> 1750 Powder Springs Road Marietta, GA 30064	<b>Figure 3: Groundwater Results Map</b>
--	--	--

6071

# 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  
 MAR 20 2013  
 Response and Remediation Program

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

**COPY**

## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)				
3	Tax Map and Parcel ID Number:	2-0556-03-001	Acreeage	31.53 Ac	
4	Site or Facility Name	Hodge Elementary School			
5	Site Street Address	1009 Clinch Street			
6	Site City	Savannah	County	Chatham	Zip 31405
7	Property Owner	Savannah Chatham County Board of Education			
8	Property Owner Mailing Address	208 Bull Street			
9	Property Owner City	Savannah	State	Georgia	Zip 31401
10	Property Owner Telephone No.	912-395-3000			
11	Site Contact Person	Will E. Cox	Title	Sr. Director, Constructio	
12	Site Contact Company Name	Savannah Chatham County Board of Education			
13	Site Contact Mailing Address	208 Bull Street			
14	Site Contact City	Savannah	State	Georgia	Zip 31401
15	Site Contact Telephone No.	912-395-5681			
16	Facility Operator Contact Person	Vanessa Miller-Kaigler	Title	Int. Exec. Director	
17	Facility Operator Company Name	Savannah Chatham County Board of Education			
18	Facility Operator Mailing Address	208 Bull Street			
19	Facility Operator City	Savannah	State	Georgia	Zip 31401
20	Facility Operator Telephone No.	912-395-3000			

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.

Vanessa M. Kaigler, Agent for Dr. Thomas B. Lockamy, Jr.  
 NAME (Please type or print)  
 DATE: March 15, 2013  
 SIGNATURE: [Handwritten Signature]  
 TITLE: [Handwritten Title]

## PART II -- RELEASE INFORMATION

Page 1 of 1

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:

Buried debris from previous use of the property.

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.):

Soil samples were obtained 6/28/2012.

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).

The contaminated sites have been closed to public access and are being evaluated to determine the extent of the hazardous material. A plan to remediate the contamination is being prepared.

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

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

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

The site in the play area has been enclosed with a 6' high chain link fence.  
The site in the wooded area remains accessible.

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.

1' - 2' of native fill and top soil in the play areas.  
1' - 2' of native organic surface debris in wooded area.

## PART II -- RELEASE INFORMATION

(Continued)

Page 2 of 2

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: Derenne Middle School

Address: 1009 Clinch Street, Savannah, GA 31405

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: City of Savannah

Address: PO Box 1027, Savannah, GA 31402

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

Yes

No

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

## REQUIRED ATTACHMENTS

### 9. SITE SUMMARY

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

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

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

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

### **Hodge ES Site Description**

The subject property is located 1009 Clinch Street, Savannah, Chatham County, Georgia 31405. The school consists of a two story hub building with three one story radiating wings and a cafeteria. It is a concrete block building with a brick façade. The subject property is made up of two adjoining parcels both owned by the Board of Education. The northeast parcel is 31.525 acres and is known as the East Parcel of the ACL Reynold Lumber Company. Its PIN # is 2-0556 -03-001. The southwest parcel is 5.892 acres is known as Parcel B of Reynolds Manley Company Tract. Its PIN # is 2-0557-01-004A. The school is located on the southwest side of the East Parcel of the ACL Reynold Lumber Company tract and on Parcel B of Reynolds Manley Company Tract. The northeast side of the subject site is open playgrounds. The extreme northeast side of the subject site is wooded.

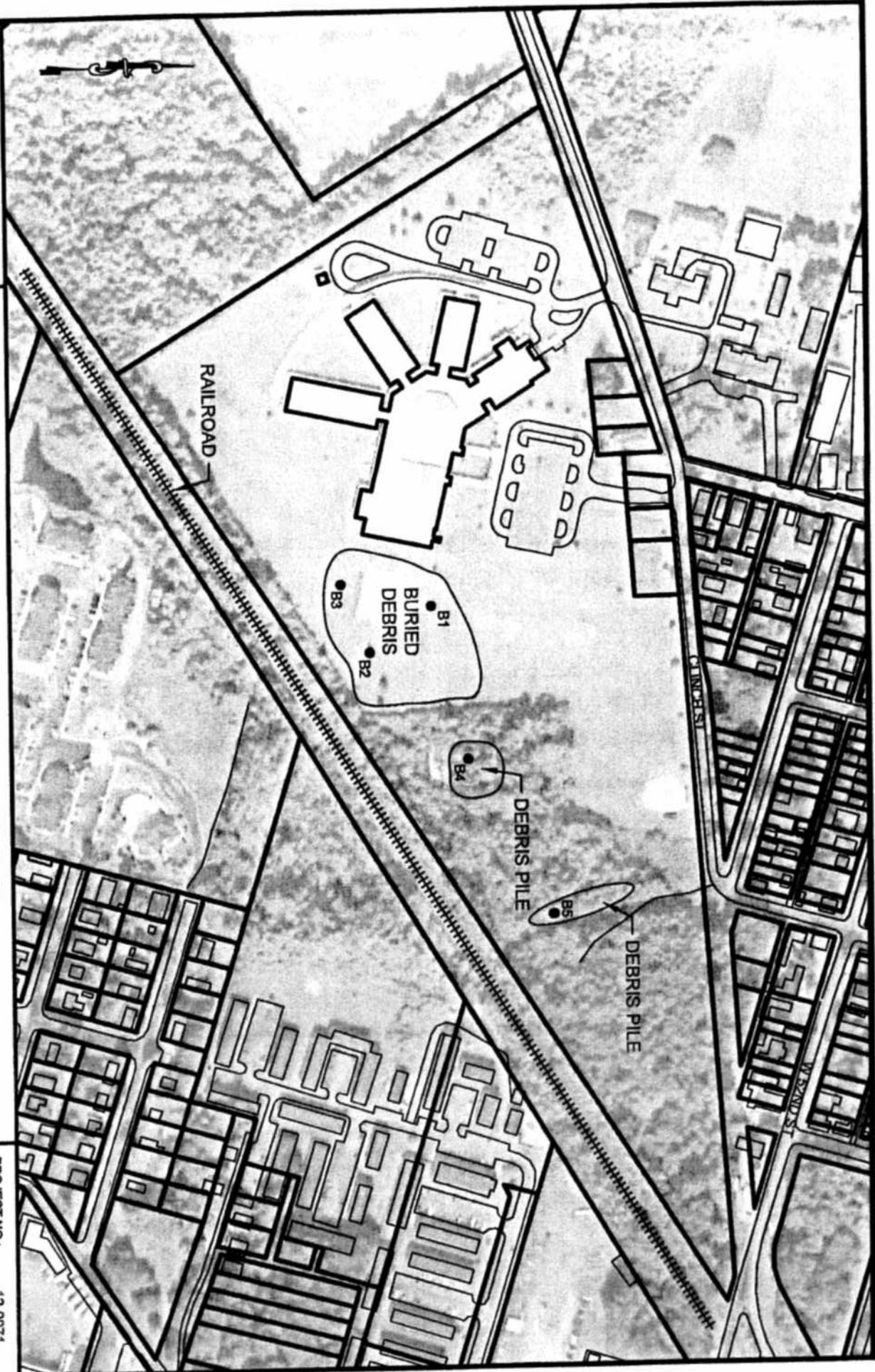


PROJECT NO.:	12,0071
DRAWN BY:	D.J.F.
DESIGNED BY:	
SURVEYED BY:	
SURVEY DATE:	TDB
CHECKED BY:	
SCALE:	1" = 3900'
DATE:	JUNE 2012

**DERENNE MIDDLE SCHOOL**  
**PHASE I ESA**  
**ONE AND THREE MILE RADIUS**  
**SAVANNAH, GEORGIA**  
 Prepared for:  
**SCCPSS**

**EMC**  
**SERVICES, INC.**  
 201 EAST CHATELAIN STREET  
 SAVANNAH, GEORGIA 31404  
 PHONE: (912) 233-8888  
 FAX: (912) 233-8888  
 WWW: EMC-SERVICES.COM

MEMBER: ATLANTA, AUGUSTA, SPANISH WOODS, COLUMBIA, SAVANNAH, STATESBORO & WILMINGTON



**EMC ENGINEERING SERVICES, INC.**



POST OFFICE BOX 8101  
23 EAST CHARLTON STREET  
SAVANNAH, GEORGIA 31412  
PHONE: (912) 232-6533  
FAX: (912) 233-4580  
WWW.EMC-ENG.COM

ALBANY, ATLANTA, AUGUSTA, BRUNSWICK,  
COLUMBUS, STATESBORO, AND VALDOSTA

**HODGE ELEMENTARY SCHOOL**

PHASE I ESA  
SOIL SAMPLE LOCATIONS  
SAVANNAH, GEORGIA

Prepared for:  
SCCPSS

**FIGURE 1**

PROJECT NO.:	12-0071
DRAWN BY:	DLF
DESIGNED BY:	-
SURVEYED BY:	-
SURVEY DATE:	-
CHECKED BY:	-
SCALE:	1" = 300'
DATE:	JUNE 2012



GEORGIA DEPARTMENT OF EDUCATION  
AMENDED PHASE I ESA

FOR

HODGE ELEMENTARY SCHOOL  
SAVANNAH, GEORGIA  
CHATHAM COUNTY



EMC ENGINEERING SERVICES, INC.

- ENVIRONMENTAL
- MARINE
- CIVIL
- SURVEY

23 E. Charlton Street  
P. O. Box 8101  
Savannah, GA 31412  
Phone (912) 232-6533  
FAX (912) 233-4580

GEORGIA DEPARTMENT OF EDUCATION  
AMENDED PHASE I ESA

FOR

HODGE ELEMENTARY SCHOOL  
SAVANNAH, GEORGIA  
CHATHAM COUNTY

GEORGIA DEPARTMENT OF EDUCATION  
PRELIMINARY SITE EVALUATION

FOR

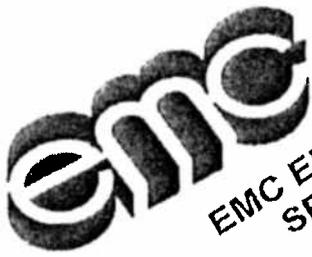
**HODGE ELEMENTARY SCHOOL  
SAVANNAH, GEORGIA  
CHATHAM COUNTY**

PREPARED FOR:

SAVANNAH-CHATHAM COUNTY PUBLIC SCHOOL  
SYSTEM

EMC PROJECT NUMBER 12-0071

JUNE 2012



**EMC ENGINEERING  
SERVICES, INC.**

23 E. Charlton St. (31401)  
P.O. Box 8101  
Savannah, Georgia 31412

Phone (912) 644-3200  
Fax (912) 233-4580  
E-mail - john\_patrick@emc-eng.com

- Environmental
- Marine
- Civil

July 6, 2012

Mr. Will E. Cox  
Senior Director  
Facilities Construction  
SCCPSS  
208 Bull Street  
Savannah, Georgia 31401

RE: Amended Phase I ESA  
Soil Boring/Sampling Report  
Hodge Elementary School  
Savannah, Georgia  
EMC Project No. 12-0071

Dear Mr. Cox:

EMC contracted with the Savannah-Chatham County Public School System (SCCPSS) to complete five hand auger soil borings in the area of the proposed Hodge Elementary School where debris had been previously uncovered by WPC and also in the area where surface debris was observed on the ground surface in the wooded area inside the perimeter fence west of the DeRenne Middle School during the Phase I ESA. For the soil samples collected during this work, a chain-of-custody was completed and the samples were analyzed for RCRA metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver). One of the soil samples collected in the football field which was submitted for analysis had a barium level at 570 mg/kg which exceeds the EPD Hazardous Site Inventory (HSI) notification concentration (NC) (500 mg/kg). Another soil sample collected inside the wooded area had a mercury level at 18.3 mg/kg which exceeds the EPD HSI NC (17.00 mg/kg). The site owner is required to notify EPD Hazardous Site Inventory within 30 days that the contaminant levels exceeded the NC unless measures are taken to remediate the release to below NC levels. Other metals were detected but are not above the NC.

A total of eight samples were submitted to an EPD approved laboratory. During the installation of the soil borings brick, rocky, and woody debris prohibited drilling to the proposed five feet depth in all the borings. Samples of the soil in each boring were placed in a stainless steel bowl and mixed to get a homogenous mixture. A sample was placed in a sample jar provided by an EPD approved laboratory, labeled, and placed on ice in an insulated shipping container. Sampling equipment was washed with potable water and Liquinox soap and then rinsed with potable water between sample locations.

Any release that, within 30 days of the owner's discovery no longer exceeds the NC does not require EPD notification. Once a release is reported that exceeds the NC, EPD makes their own determination of whether the release is reportable. If it is reportable, they will list the site on the HSI list (State's superfund sites). They will decide if corrective action is required. The residential clean up level for barium (1000 mg/kg) is greater than its NC, so we would expect

July 6, 2012  
Mr. Cox  
Page 2

that no clean up would be required in the football field. The residential clean up level for mercury is 0.5 mg/kg so we would expect clean up would be required in the wooded area around boring B4.

Our experience with school sites that exceed the NC but were non-hazardous has been to delineate the contamination and remove the NC soil and disposed of it in accordance with EPD Solid Waste and Hazardous Waste Rules. The soil left on the site did not exceed the residential criterion for the contaminant. The soil that was removed was replaced with clean fill material within the 30 day time frame and the school site did not go onto the HSI list.

Our experience with sites that the EPD decided had a reportable quantity release and were on the HSI list required contaminated soil delineation, groundwater sampling, a corrective action plan, and treatment of the soil to make it non-hazardous before it could be disposed of at a non-hazardous landfill (Subtitle D landfill). The rule of thumb for determining if a soil will fail the Toxicity Leaching Procedure (TCLP) and be a hazardous waste is to divide the total contaminant level by twenty and if the quotient is greater than the TCLP level then it will be considered hazardous waste. The soil sample B4-1 had a mercury level of 18.3 mg/kg. The TCLP level for mercury is 0.2 mg/l. Dividing 18.3 mg/kg by 20 gives 0.915 mg/l. Based on that, it is a good probability that the soil around boring B4-1 would be considered hazardous waste and would require treatment. We would have to investigate the least expensive way to treat the soil to make it non-hazardous. Our experience has been to mix the hazardous soil with cement which kept it from leaching out a level exceeding the TCLP level.

Our recommendation would be to postpone the proposed Gadsen Elementary School expansion in the football field at DeRenne Middle School and not to expand into the woods beyond the fence on the west side of DeRenne Middle School until SCCPSS hears back from EPD after they report the release of barium and mercury.

Material encountered and sample results are attached in Table 1. The sample locations are shown on Figure 1. Photographs of the sample locations are attached.

If you have any questions or comments please contact Tim Baumgartner at 912-232-6533.

Sincerely,



A. John Patrick, PG

Attachments:



6072

# 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  
 MAR 22 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:	Dublin(District 2) D11C 011	Acreage	39.01	
4	Site or Facility Name	Botkin Lumber Co Inc.			
5	Site Street Address	700 Industrial Blvd			
6	Site City	Dublin	County	GA	Zip 31021
7	Property Owner	Botkin Lumber Co., Inc.			
8	Property Owner Mailing Address	PO BOX 1022			
9	Property Owner City	Farmington	State	MO	Zip 63640
10	Property Owner Telephone No.	573-756-2400 x 1024			
11	Site Contact Person	Jennifer Blum	Title	Part-time Site Contact	
12	Site Contact Company Name	Botkin Lumber Co., Inc.			
13	Site Contact Mailing Address	PO BOX 1022			
14	Site Contact City	Farmington	State	MO	Zip 63640
15	Site Contact Telephone No.	573-756-2400 x 1024			
16	Facility Operator Contact Person	Dale Jones	Title	Part-time Site Contact	
17	Facility Operator Company Name				
18	Facility Operator Mailing Address	PO BOX 1022			
19	Facility Operator City	Farmington	State	MO	Zip 63640
20	Facility Operator Telephone No.	478-290-4785 alternate 573-756-2400 x 1024			

**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.

Jennifer Blum  
 NAME (Please type or print)

President  
 TITLE

Jennifer Blum  
 SIGNATURE

3-14-13  
 DATE

## PART II -- RELEASE INFORMATION

Page 2 of 8

**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:**  
Paint storage tanks and/or poor housekeeping by previous owner.

**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; Prior to 2003 purchase of the site by Botkin Lumber Co., Inc.

**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 Ground Water Sampling February 2013; See report included as Attachment I.

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

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

**If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.**  
Site has a chainlink fence extending around the entire property with one automatically locking gate at the front entrance. Site is only occupied on a part time basis.

**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.**

Sparse ground cover vegetation with clay underneath. See boring logs included as Appendix II of attached Report (Attachment I).

## PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 8

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: Howard Louise

Address: 304 Eleanor Dr, Dublin, GA 31021

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: City of Dublin

Address: P.O. Box 690-106 Parkers Dairy Road  
Dublin, Georgia 31040

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

Yes  
 No

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

## REQUIRED ATTACHMENTS

### 9. SITE SUMMARY

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

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

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

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



## PART IV -- GROUNDWATER RELEASE INFORMATION

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

Regulated Substance	CAS Registry Number	Highest Detected Concentration (Specify Units)	Sample Depth Below Ground Surface (Feet)
Acetone	67-64-1	1100 µg/L	11-21
Benzene	71-43-2	120 µg/L	11-21
Ethylbenzene	100-41-4	35 µg/L	11-21
Methylcyclohexane	108-87-2	0.3 µg/L	11-21
Tetrachloroethene	127-18-4	1.6 µg/L	11-21
Toluene	108-88-3	25,000 µg/L	11-21
Trichloroethylene	79-01-6	0.19 µg/L	11-21
Xylene(total)	1330-20-7	58 µg/L	11-21
2-Methylphenol	95-48-7	140 µg/L	11-21
4-Methylphenol	106-44-5	150 µg/L	11-21
Benzaldehyde	100-52-7	46 µg/L	11-21
bis(2-Ethylhexyl)Phthalate	117-81-7	1.1 µg/L	11-21
Naphthalene	91-20-3	2.6 µg/L	11-21
Phenol	108-95-2	1.4 µg/L	11-21

**Site Summary**  
**Release Notification/Reporting Form**  
**Former Botkin Lumber Company Site**  
**700 Industrial Boulevard**  
**Dublin, Georgia**

In conjunction with the sale of the property at 700 Industrial Boulevard in Dublin, Georgia, Botkin Lumber retained O'Brien & Gere Engineers Inc. to conduct an environmental investigation into potential impacts from the former onsite operations as a furniture manufacturing facility. Botkin Lumber is currently leasing the property to Farmers Furniture and it is being used for warehouse space only.

O'Brien & Gere understands that Botkin relied on a limited degree of due diligence performed by others prior to the purchase of the above referenced property in 2003. As part of these activities, soil impacted with volatile organic compounds (VOCs) was identified. A release was reported to the Georgia Department of Natural Resources, Environmental Protection Division (GEPD), on December 12, 2003. In a letter dated February 4, 2004 and signed by Alexandra Y. Cleary it was determined by the GEPD that the release did not exceed a reportable quantity. The property was not listed on the Hazardous Site Inventory (HSI). The property was marketed for sale by Botkin in late 2012 and additional due diligence was conducted by the prospective purchaser. As part of these activities, groundwater impacted with VOCs was identified.

Botkin requested that O'Brien & Gere review the environmental activities historically performed for the subject property, evaluate current soil and groundwater conditions at the subject property in areas historically identified as recognized environmental conditions (RECs), and provide recommendations for further action that may be required to facilitate the sale of the property.

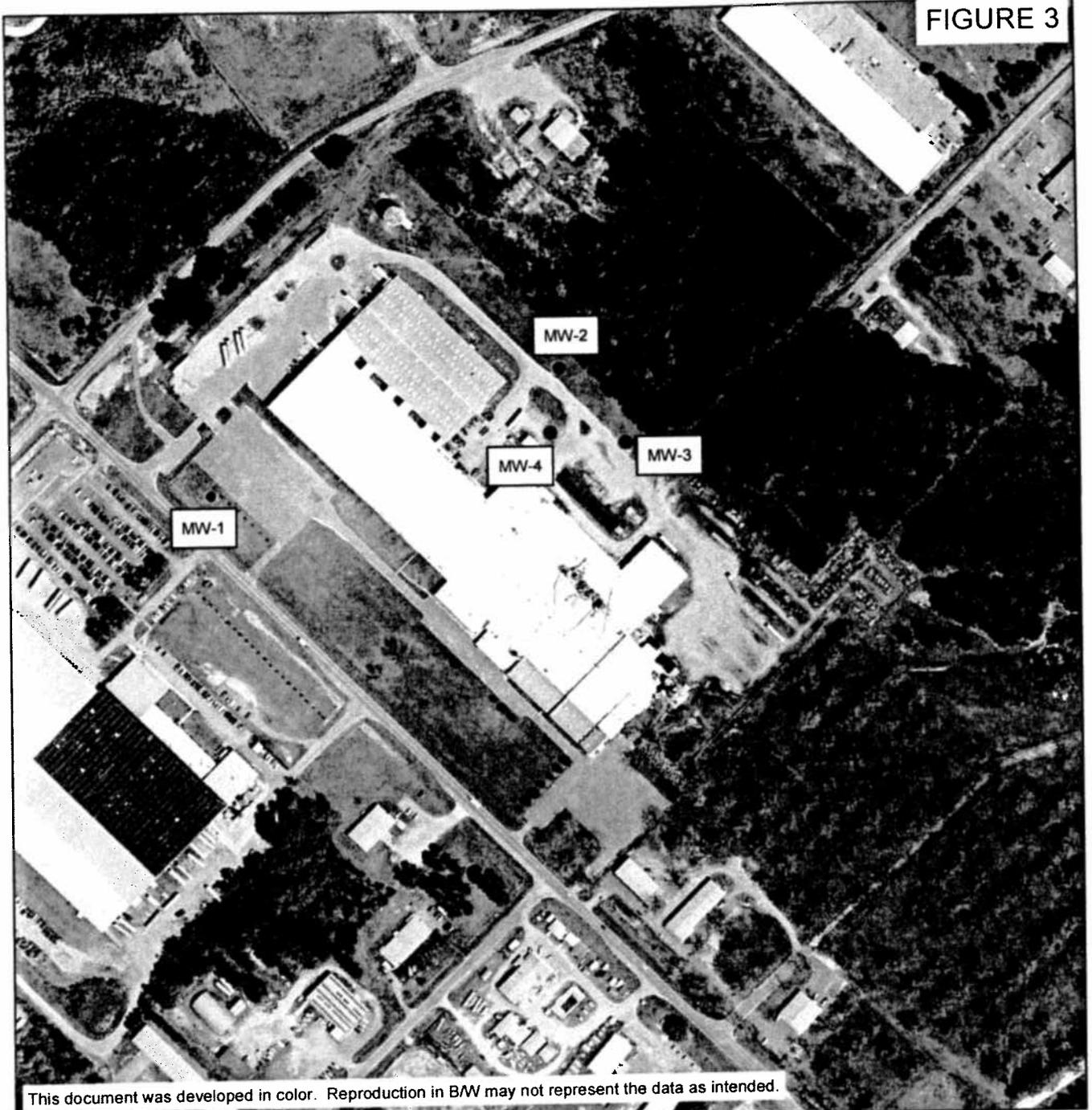
Initial soil sampling identified acetone detected at a concentration of 4.40 milligrams per kilogram (mg/kg) in the soil sample collected from behind the former hazardous waste shed (MW-4) at 12 to 14 feet below ground surface (bgs). This concentration exceeds the GEPD notification concentration (NC) of 2.74 mg/kg, as defined by Chapter 391-3-19 Hazardous Site Response Regulation (The Rules), Appendix I.

Initial groundwater sampling identified benzene detected at a concentration of 0.120 milligrams per liter (mg/l) and toluene detected at a concentration of 25 mg/l in the groundwater sample collected from behind the former hazardous waste shed (MW-4). These concentrations exceed the United States Environmental Protection Agency (USEPA) Maximum Contaminant Levels (MCLs) of 0.005 and 1.0 mg/l, respectively. However, it should be noted that the nearest public drinking water wells appear to be located just under 4 miles to the east of the site, and as noted on the reporting form, the site is fully fence and should be considered inaccessible.

Once a release is reported to GEPD, the Reportable Quantities Screening Method (RQSM) is used to determine if a site is eligible for listing on the HSI. Based on RQSM scoring for acetone, benzene, and toluene using conservative assumptions (see Appendix V of the report included as Attachment I of this submission), it does not appear that the subject property would be included on the HSI. As a result, it is proposed that no further action be required with respect to the identified conditions.

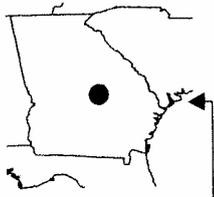
I:\Botkin-Lumber.20066\50102.Botkin-Dublin-E\Docs\Reports\Final Report Docs\Summary.doc

FIGURE 3



This document was developed in color. Reproduction in B/W may not represent the data as intended.

Monitoring Well Locations



MAP LOCATION

**BOTKIN LUMBER**  
**Environmental Review and Limited**  
**Soil and Groundwater Investigation**  
**Dublin, Georgia**



**SITE LOCATION**



1:5,000

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY

STATE OF GEORGIA  
DEPARTMENT OF NATURAL RESOURCES  
GEOLOGIC AND WATER RESOURCES DIVISION

DUBLIN QUADRANGLE  
GEORGIA—LAURENS CO.  
7.5 MINUTE SERIES (TOPOGRAPHIC)



Map made, edited, and published by the Geological Survey  
Control by USGS, NOS/NOAA, USCE, and Georgia Geologic Survey  
Topography by photogrammetric methods from aerial  
photographs taken 1973. Fields checked 1974.  
Projection and 15,000-foot grid ticks: Georgia Coordinate System,  
North Zone (Transverse Mercator)  
1000-meter Universal Transverse Mercator grid ticks,  
zone 17, shown in black. 1927 Mean American datum.  
To check on the published North American Datum 1983  
from the projection zone 14 means north, and  
17 means east as shown by dashed center ticks.  
Red tick marks show in which zone landmark buildings are shown.  
Previous sheets in purple included in cooperation with State of  
Georgia agencies from aerial photographs taken 1961 and other  
sources. This information not field checked. Map scale 1:24,000.

UTM GRID AND 1983 MAGNETIC NORTH  
DECLINATION AT CENTER OF SHEET

SCALE 1:24,000  
CONTOUR INTERVAL 10 FEET  
NATIONAL GEODESIC VERTICAL DATUM OF 1929

ROAD CLASSIFICATION  
Primary highway: Light duty road, hard or  
hard surface / Light duty road, hard or  
Secondary highway: Hard surface / unpaved surface  
Hard surface / Unimproved road  
State Route: U.S. Route / State Route

USGS MAP HISTORICAL MAP  
MAR 14 1986  
REC'D FILE COPY

DUBLIN, GA.  
33082-58-19-024  
1974  
PHOTOREVISED 1985  
GSA CODE IS 50-108-0000

THIS MAP COMPLEYS WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U.S. GEOLOGICAL SURVEY, RESTON, VIRGINIA 22092  
A FOLDER CARRYING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST