

RANDALL D. QUINTRELL, P.C.

AUG 1 2013

ATTORNEY AT LAW

999 Peachtree Street, NE
Suite 2300
Atlanta, Georgia 30309-3996

Response and Remediation Program

Telephone (404) 853-8366
Facsimile (404) 724-0487

July 31, 2013

E-mail: randy.quintrell@sutherland.com

BY HAND DELIVERYDerrick Williams
Program Manager
Hazardous Sites Response Program
Georgia Environmental Protection Division
Suite 1462, Floyd Tower East
2 Martin Luther King, Jr. Drive, SE
Atlanta, Georgia 30334**Re: HSRA Release Notification Form for Fitzgerald Properties, Ltd.
Site at 318 S. Grant Street, Fitzgerald, Ben Hill County, Georgia (the
"Property")**

Dear Mr. Williams:

I represent Fitzgerald Properties, Ltd., the owner of the Property. Enclosed herewith please find a completed HSRA Release Notification form for the Property.

Certain groundwater impacts were discovered during Phase I/Phase II investigations performed by United Consulting on behalf of a potential purchaser. United concluded that these impacts were likely from historical, upgradient, off-site source(s). The Groundwater Pathway score for the Property is 6.5 and therefore Fitzgerald Properties, Ltd. respectfully requests that a "no listing" letter be issued as soon as possible.

Please let me know if you need additional information. We appreciate your assistance on this matter.

Sincerely,



Randall D. Quintrell

cc: Mr. Asbury Snow
Enclosures

6116

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

AUG 1 2013

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

Response and Remediation Program

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	N/A			
3	Tax Map and Parcel ID Number:	B11 S10L6+	Acreage	2.3 acres	
4	Site or Facility Name	Fitzgerald Summit			
5	Site Street Address	318 S. Grant Street			
6	Site City	Fitzgerald	County	Ben Hill	Zip 31750
7	Property Owner	Fitzgerald Properties, Ltd.			
8	Property Owner Mailing Address	5605 Glenridge Drive			
9	Property Owner City	Atlanta	State	GA	Zip 30342
10	Property Owner Telephone No.	678-514-5908			
11	Site Contact Person	Mr. Asbury Snow	Title		
12	Site Contact Company Name				
13	Site Contact Mailing Address	5605 Glenridge Drive			
14	Site Contact City	Atlanta	State	GA	Zip 30342
15	Site Contact Telephone No.	678-514-5908			
16	Facility Operator Contact Person	same as above	Title		
17	Facility Operator Company Name				
18	Facility Operator Mailing Address				
19	Facility Operator City		State		Zip
20	Facility Operator Telephone No.				

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

Asbury D. Snow
NAME (Please type or print)

General Partner
TITLE

[Signature]
SIGNATURE

7/31/13
DATE

PART II -- RELEASE INFORMATION

Page _____ of _____

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

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

Suspected release(s) that may have impacted the Site are identified, up-gradient, off-site historic filling stations/auto repair facilities and historic dry cleaners located within close proximity 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.):
Unknown.

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

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

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

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

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

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

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

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

N/A

PART II -- RELEASE INFORMATION

(Continued)

Page _____ 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: Vacant residence

Address: 213 E. Jessamine 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: Fitzgerald Utilities

Address: PO Box 667, Fitzgerald, GA 31750

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

Yes No

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

REQUIRED ATTACHMENTS

9. SITE SUMMARY

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

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

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

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

ATTACHMENT A

SITE SUMMARY

The Fitzgerald Summit property is located at 318 S. Grant Street in Fitzgerald, Ben Hill County, GA (the "Property"). The Property consists of approximately 2 acres of land with a 5-story, multi-family residential structure used to house senior, low-income and handicapped persons. The remainder of the Property is developed with asphalt paved parking areas, a storage shed, an alleyway and landscaped areas. A Site Location Map is attached as Fig. 1; a USGS Topographic map is attached as Fig. 2; and a Site Map showing existing development is attached as Fig. 5.

The Property was developed with the current structures in 1979. Prior to that, the Property was used for single-family residential, a carpet/bicycle repair shop, and other small retail shops. Based on a Phase I ESA performed by United Consulting ("United") for a potential purchaser in June 2012, the Property is not listed on any of the federal or state databases.

The Property is surrounded by roads, vacant lots, commercial and residential properties. Nineteen listed, regulated facilities were identified by United within the relevant search distances from the Property. United concluded that a number of nearby historic filling stations, dry-cleaners and auto/service facilities represented "Recognized Environmental Conditions" and therefore United recommended that a Phase II ESA be conducted.

United performed Phase II sampling in June 2012. The United Phase II included 8 direct push borings (DP-1 through DP-8). The attached Fig. 3 shows the locations of the borings. Seven groundwater samples (DP-8 was dry) were analyzed for VOC's and PAH's. Several petroleum-related constituents, which are exempt and not reportable under HSRA pursuant to Ga. Rule 391-3-19-.04(2)(g) and (h), were detected in low concentrations. Also, cis,1,2-dichloroethene was detected in 3 groundwater samples. Two of these detections were at approximately the applicable MCL (5.8 ppb and 7.4 ppb vs. MCL of 7.0 ppb) and the third was at 180 ppb. One soil sample was analyzed for TPH-DRO and PAH's. There were no detections. United concluded that the source of these groundwater impacts was likely one or more of the off-site, nearby facilities that it had identified as "Recognized Environmental Conditions".

Based on a review of pertinent files at EPD and discussions with the City of Fitzgerald Utilities Department, there are no drinking water wells within at least 1 mile of the Property. Historically, there were drinking water wells located between ½ and 1 mile from the Property owned by the City of Fitzgerald. However, those wells have been closed and are no longer used. Attached is a letter from Mr. Jeff Lewis, General Manager/CEO of Fitzgerald Utilities, documenting that those wells have been taken out of use. Mr. Lewis also confirms the lack of other drinking water wells within 1 mile of the Property and that the City requires all residential and commercial properties to connect to and use the public water system owned and operated by the City of Fitzgerald.

A completed "Groundwater Pathway" calculation for the Property is attached which yields a score of 6.5, well below the applicable 10 threshold. Accordingly, Fitzgerald Properties, Ltd. respectfully requests that it be issued a "No-List" letter as soon as possible.

ETRI

Environmental Technology Resources, Inc.

RECEIVED
Georgia EPD

August 7, 2013

AUG 7 2013

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

Response and Remediation Program

Re: Release Notification, Former Westside Cleaners, 700 Sandtown Road Subparcel, Marietta, Cobb County, Georgia

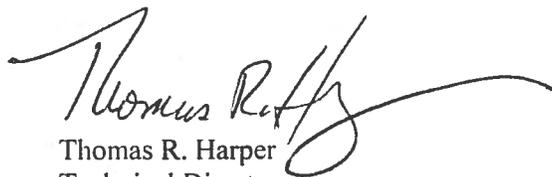
To Whom It May Concern:

Enclosed, please find a release notification for the former Westside Cleaners located at 700 Sandtown Road in Marietta, Cobb County, Georgia.

Please note that the prospective purchaser has submitted a Prospective Purchaser Corrective Action Plan to the Georgia EPD – Brownfield's Program. Therefore, we are requesting that the Georgia EPD delay scoring of the site until completion of the Brownfield requirements.

Please call me at (770) 888-8181 if you have any questions regarding the information provided.

Sincerely,
ENVIRONMENTAL TECHNOLOGY RESOURCES, INC.



Thomas R. Harper
Technical Director

Attachments

Cc. Mr. Richard Horder, Kazmarek Mowrey Cloud Laseter LLP

13-054.205

6117

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)	N/A			
3	Tax Map and Parcel ID Number:	17 021400790 (Tract 2)	Acreage	0.5 acres more or less	
4	Site or Facility Name	Former Westside Cleaners			
5	Site Street Address	700 Sandtown Road			
6	Site City	Marietta	County	Cobb	Zip 30009
7	Property Owner	YNH Properties, LLC			
8	Property Owner Mailing Address	6115 Song Breeze Trace			
9	Property Owner City	Duluth	State	GA	Zip 30097
10	Property Owner Telephone No.	949-533-6368			
11	Site Contact Person	Richard A. Horder	Title	Esq.	
12	Site Contact Company Name	Kazmarek Mowrey Cloud Laseter LLP			
13	Site Contact Mailing Address	3490 Piedmont Road NE, Suite 350			
14	Site Contact City	Atlanta	State	GA	Zip 30305
15	Site Contact Telephone No.	404-812-0843			
16	Facility Operator Contact Person	N/A	Title		
17	Facility Operator Company Name	N/A			
18	Facility Operator Mailing Address				
19	Facility Operator City		State		Zip
20	Facility Operator Telephone No.				

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

Se Hong Yi Managing Member
 NAME (Please type or print) TITLE
[Signature] 08/02/13
 SIGNATURE DATE

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:

The suspected source of the groundwater release is the former Westside Cleaners which operated on the subject property.

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

Release dates - Unknown, Physical State of Material - Liquid

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

Soil and groundwater sampling using a geoprobe. Installation of two-inch groundwater monitoring wells

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.

Asphalt - Three Inches

PART II -- RELEASE INFORMATION

(Continued)

Page _____ of _____

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

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

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

Name: Apartments

Address: Powder Springs Road

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

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

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

Name: _____

Address: _____

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

Yes No

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

REQUIRED ATTACHMENTS

9. SITE SUMMARY

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

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

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

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

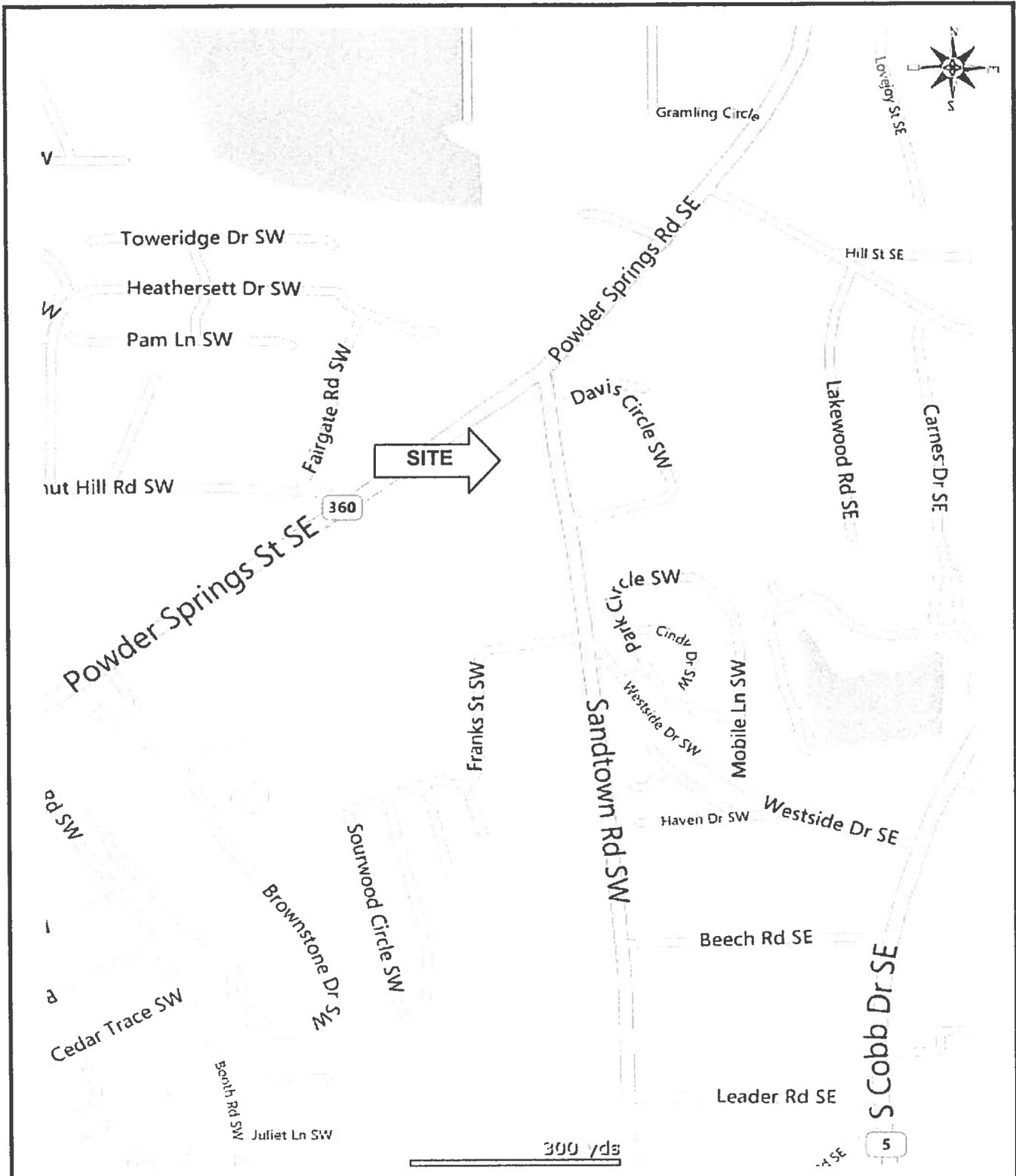
PART IV -- GROUNDWATER RELEASE INFORMATION

Page ____ of ____

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

Regulated Substance	CAS Registry Number	Highest Detected Concentration (Specify Units)	Sample Depth Below Ground Surface (Feet)
Chloroform	67663	13 ug/L	11.9 - 13.5
1,1-Dichloroethene	75354	6.9 ug/L	11.9 - 13.5
cis-1,2-Dichloroethene	25323302	3,900 ug/L	11.9 - 13.5
Ethylbenzene	100414	6.0 ug/L	11.9 - 13.5
Tetrachloroethene	127184	40,000 ug/L	11.9 - 13.5
Toluene	108883	8.2 ug/L	11.9 - 13.5
trans-1,2-Dichloroethene	75354	45 ug/L	11.9 - 13.5
Trichloroethene	79016	910 ug/L	11.9 - 13.5
Xylenes	1330207	16.2 ug/L	11.9 - 13.5
Vinyl Chloride	75014	430 ug/L	11.9 - 13.5

Figures



Source: Freshlogiestudios.com

ETRI

Environmental Technology Resources, Inc.
 4780 Ashford Dunwoody Rd.
 Suite A-456
 Atlanta, Georgia 30338
 Scale: Noted

FIGURE 1
SITE LOCATION MAP
 700 Sandtown Road
 Marietta, Georgia

Project Number 13-054



ETRI

Environmental Technology Resources, Inc.
 4780 Ashford Dunwoody Rd.
 Suite A-456
 Atlanta, Georgia 30338

Scale: Not to Scale

FIGURE 2

SOIL BORING LOCATIONS

700 Sandtown Road
 Marietta, Georgia

Project Number 13-054



ETRI

Environmental Technology Resources, Inc.
 4780 Ashford Dunwoody Rd.
 Suite A-456
 Atlanta, Georgia 30338
 Scale: Not to Scale

**FIGURE 3
 MONITORING WELL LOCATIONS**

700 Sandtown Road
 Marietta, Georgia

Project Number 13-054



ETRI

Environmental Technology Resources, Inc.
 4780 Ashford Dunwoody Rd.
 Suite A-456
 Atlanta, Georgia 30338

Scale: Not to Scale

**FIGURE 4
 POTENTIOMETRIC MAP**
 700 Sandtown Road
 Marietta, Georgia

Project Number 13-054

Attachment A – Laboratory Analytical Reports



Environmental Consulting & Technology, Inc.

RECEIVED
Georgia EPD

AUG 9 2013

August 8, 2013

Response and Remediation Program

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

**RE: Release Notification Package
Grocery Store Property
874, 876 and 878 Cleveland Avenue
East Point, Fulton County, Georgia**

Dear Sir or Madam,

Environmental Consulting and Technology, Inc. (ECT) is providing the attached release notification form for the above referenced site. The prospective purchaser of this site is applying for limitation of liability protection from Georgia's Brownfields Program. A Prospective Purchaser Corrective Action Plan (PPCAP) is being submitted in tandem with this release notification. The PPCAP is being submitted to Mr. Kent Pierce with the Brownfields Program.

Please note that the entity that is listed as the property owner on the release notification is the documented prospective purchaser of the site. Ledbetter Development Partners, LLC acquired the property on July 31, 2013. Ledbetter Development Partners, LLC is seeking liability protection under the 2012 amendment of the Hazardous Site Reuse and Redevelopment Act, O.C.G.A Section 12-8-202(b)(6). This amendment states a prospective purchaser can include "a person who has applied for a limitation of liability pursuant to this article within 30 days of acquiring title to a property where there is a preexisting release." Should additional investigative requirements be deemed necessary following the release notification review, Ledbetter Development Partners, LLC seeks that any additional requirements be the responsibility of the prior property owner which has been identified as the following entity:

Estate of Charles T. Davis, Sr.
1779 W Vesta Avenue
East Point, Georgia 30344

Please do not hesitate to contact the undersigned at (770) 634-0969 if you have any questions or require additional information.

Sincerely,
ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Kevin W. McGowan
Atlanta Office Manager

1870 The Exchange
Suite 100
Atlanta, GA
30339-2021

(770)
989-7335

FAX (770)
989-7336

6118.

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

AUG 9 2013

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

Response and Remediation Program

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)					
3	Tax Map and Parcel ID Number:	14 010000020271	Acreage	1.19		
4	Site or Facility Name	Grocery Store Parcel				
5	Site Street Address	874, 876 and 878 Cleveland Avenue				
6	Site City	East Point	County	Fulton	Zip 30344	
7	Property Owner	Ledbetter Development Partners, LLC				
8	Property Owner Mailing Address	106 East 8 th Avenue				
9	Property Owner City	Rome	State	GA	Zip 30161	
10	Property Owner Telephone No.	706-291-7283				
11	Site Contact Person	Robert H. Ledbetter, Jr.	Title	Representative		
12	Site Contact Company Name	Same as Property Owner				
13	Site Contact Mailing Address					
14	Site Contact City		State		Zip	
15	Site Contact Telephone No.					
16	Facility Operator Contact Person	Same as above	Title			
17	Facility Operator Company Name					
18	Facility Operator Mailing Address					
19	Facility Operator City		State		Zip	
20	Facility Operator Telephone No.					

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

NAME (Please type or print)

SIGNATURE

TITLE

DATE

Robert Ledbetter Jr

Manager
 8/6/2013

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:

Based on the Phase I and Phase II investigations conducted in the area, it is believed that the source of the release is from the former drycleaning operations (3) located at an offsite and adjacent property to the west of the site. It is suspected that the vinyl chloride detected in groundwater was a result of the past handling of dry cleaning solvents at the adjacent 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.):

It is known that up to three dry cleaning buildings and/or operations were operated at the contiguous property to the west in the 1960's and 1970's. It is assumed that the physical state of release was via liquid dry cleaning solvents. The quantity released is unknown.

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

Four temporary monitoring wells and one soil boring have been installed at the site. Soil and groundwater samples have been collected from each boring location and analyzed for volatile organic compounds (VOCs). Based on the location of the borings in relation to the offsite former dry cleaning operations, and the vinyl chloride detection in groundwater, it was determined that the source of the release is offsite. No soil impact above the applicable notification concentrations have been detected and no soil removal has occurred.

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

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

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

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

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

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

NA

PART II -- RELEASE INFORMATION

(Continued)

Page 2 of 3

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: Kenneth & Latrell Ferguson (Residence)

Address: 2745 Sylvan Road, East Point, GA 30344

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

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

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

Name: NA

Address: NA

No active wells were identified within 3-miles downgradient of the site, as determined by measured groundwater flow direction. Several wells were identified greater than 1-mile of the site, however, these wells were not considered due to their upgradient position relative to the subject site. The results of the well survey has been included in Attachment C.

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

Revised May 2008

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>.

ETOWAH ENVIRONMENTAL SERVICES



9 Bedford Court
Cartersville, Georgia 30120
Phone 770.383.8914
Cell Phone 770.547.7854

August 12, 2013

RECEIVED
Georgia EPD

The Georgia Department of Natural Resources
Hazardous Sites Response Program
Suite 1462, Floyd Tower East
2 MLK Jr. Drive SE
Atlanta, Georgia 30334-9000

AUG 12 2013

Response and Remediation Program

Subject: Initial Release Notification
Just Kids Daycare Center Property
1010 N 5th Avenue and 508 W 11th Street
Rome, Floyd County, Georgia

Dear Sirs:

The enclosed HSRA Notification is being made by Bank of the Ozarks as the lender holding a security interest in the property that is the subject of the notification. As such, this is a voluntary notification, since the Bank has not foreclosed upon the property at this time and is thus not its owner or operator for purposes of HSRA notification requirements. The Bank is anxious to proceed to foreclosure as soon as possible, but does not want to do so until it receives an anticipated non-listing letter from GAEPD.

If you have any questions about the notification or if you require any additional information, please contact Dennis P. Popham at 770.547.7854.

Sincerely,

ETOWAH ENVIRONMENTAL SERVICES

Dennis P. Popham, P.G.
Principal Geologist

cc: Addressee (1)

6119

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

AUG 12 2013

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

Response and Remediation Program

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	Not Applicable			
3	Tax Map and Parcel ID Number:	J13Y 372 and J13Y 373	Acreage	0.548	
4	Site or Facility Name	Former Just Kids Daycare Center Property			
5	Site Street Address	1010 North 5 th Avenue and 508 West 11 th Street			
6	Site City	Rome	County	Floyd	Zip 30165
7	Property Owner	Winford S. and Linda C. Gibbs			
8	Property Owner Mailing Address	354 Stoner Road			
9	Property Owner City	Adairsville	State	GA	Zip 30103
10	Property Owner Telephone No.				
11	Site Contact Person	Frank Felker	Title	Special Assets Manager	
12	Site Contact Company Name	The Bank of the Ozarks			
13	Site Contact Mailing Address	950 Joe Frank Harris Parkway			
14	Site Contact City	Cartersville	State	GA	Zip 30121
15	Site Contact Telephone No.	770-606-0555			
16	Facility Operator Contact Person	Not Applicable, Closed	Title		
17	Facility Operator Company Name	Not Applicable, Closed			
18	Facility Operator Mailing Address	Not Applicable, Closed			
19	Facility Operator City	Not Applicable	State		Zip
20	Facility Operator Telephone No.	Not Applicable			

21. **CERTIFICATION** -- I certify under penalty of law that I am the ^{secured lender} 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) Frank Felker TITLE Special Assets Manager
 SIGNATURE [Signature] DATE 8/9/13

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:

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).
Limited Phase II ESA soil and groundwater samples have been collected. No remediation has occurred.

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

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

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

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

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

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

Not Applicable due to lack of detection of notifiable concentrations of listed substances in soil.

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: Private residence

Address: 509 West 11th 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: Not Applicable

Address: Not Applicable

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

Yes No

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

REQUIRED ATTACHMENTS

9. SITE SUMMARY

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

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

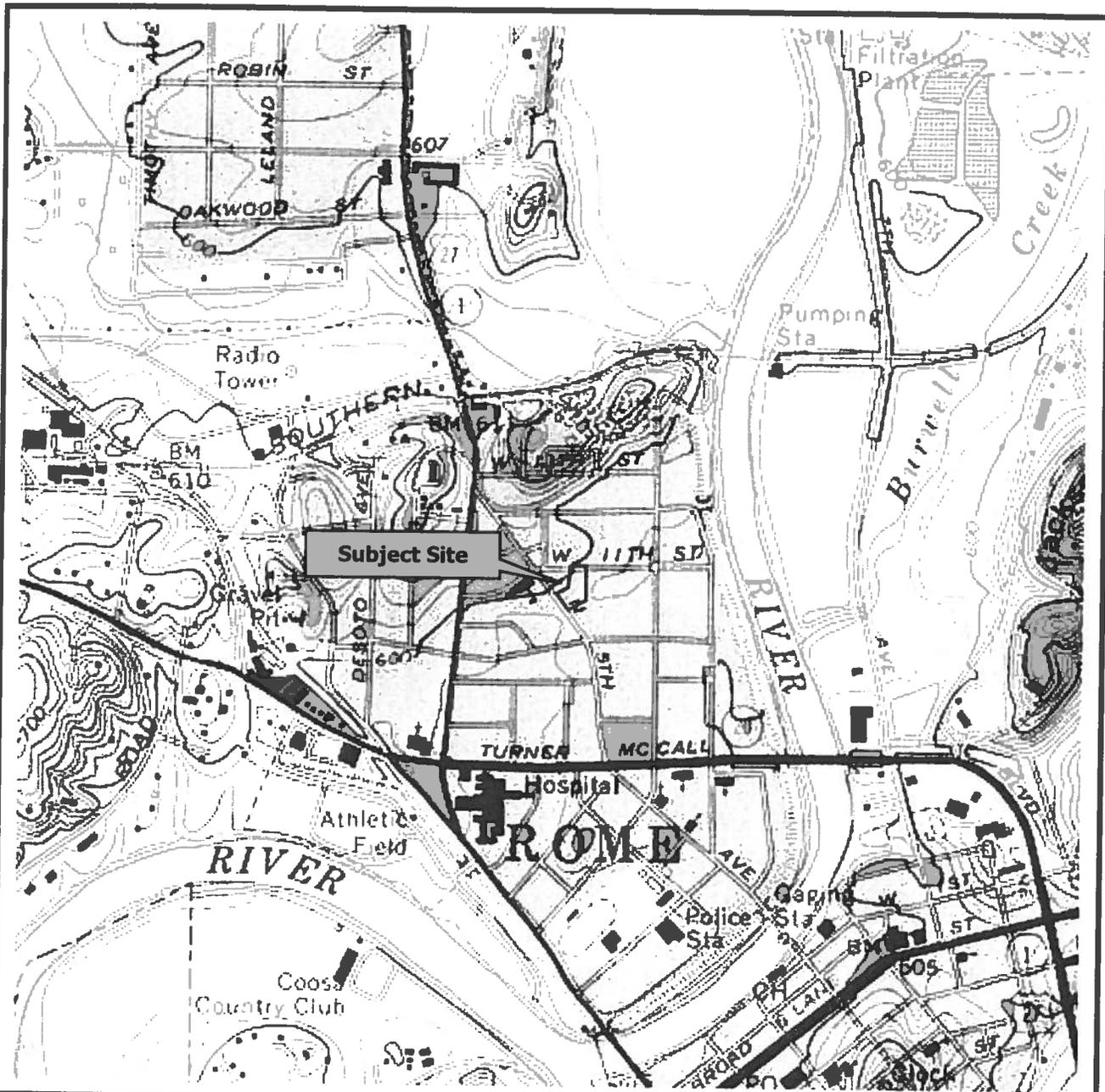
10. U.S.G.S. Topographic Map

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

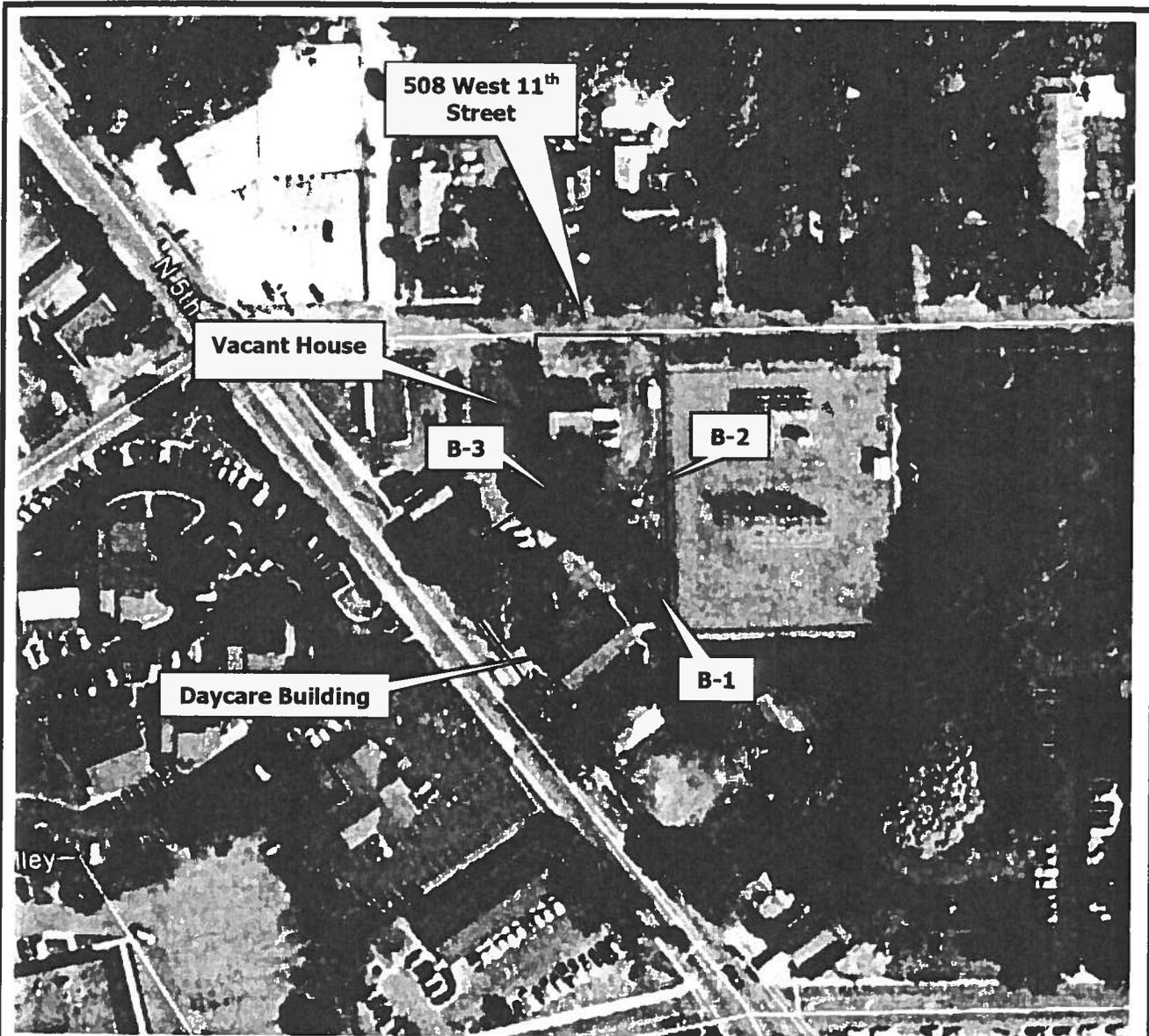
Site Summary

The Property is located at 1010 North 5th Avenue and 508 West 11th Street in Rome, Floyd County, Georgia. It is identified as Floyd County tax parcel numbers J13Y 372 and 373. The subject property consists of two commercial tracts that contain a total of 0.548 acres. The property is currently developed with a daycare center building and a storage building used by the daycare center. The main daycare center building was formerly used as a church from the 1950s until the 1970s. The other building is a former private residence that dates from the early 1900s.

In November 2012, low concentration of the volatile organic compounds (VOCs) acetone, carbon disulfide and methyl chloride were detected in three groundwater samples collected during a Phase II ESA. In July 2013, low concentrations of acetone and chloroform were detected in near surface soil samples. The concentrations of VOCs in the soil samples did not exceed the HSRA NCs for those compounds. Therefore, no formal notification of these detections is required under HSRA regulations. No drinking water MCLs have been established for the VOCs detected in the site groundwater.



Date: 07/29/13	Scale: 1:24,000	Job No: 2013-40A	Source: USGS 7.5 Minute Rome North, GA Quadrangle Map 1985
Etowah Environmental Services		<p align="center"> Figure 1–Site Location Map Just Kids Daycare Center Property 1010 North Fifth Avenue and 508 West 11th Street Rome, Georgia </p>	



Date: 07/29/13	Scale: Unknown	Job No: 2013-40A	Source: Google Earth Aerial Photo, 2009
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Etowah Environmental Services

**Figure 2 Soil Sample Location Plan
 Just Kids Daycare Center Property
 1010 North Fifth Avenue and
 508 West 11th Street
 Rome, Georgia**

ETOWAH ENVIRONMENTAL SERVICES



9 Bedford Court
Cartersville, Georgia 30120
Phone 770.383.8914
Cell Phone 770.547.7854

July 29, 2013

Mr. Frank Felker
Bank of the Ozarks
950 Joe Frank Harris Parkway
Cartersville, Georgia 30121

RE: Water Usage Survey
Just Kids Daycare Center Property
1010 N 5th Avenue and 508 W 11th Street
Rome, Floyd County, Georgia
ETOWAH Project No. 2012-79D

Dear Mr. Felker:

Introduction

This water usage survey was conducted as part of a potential Hazard Site Inventory Act (HSRA) notification for the former Just Kids Daycare Center property located at 1010 N 5th Avenue and 508 W 11th in Rome, Floyd County, Georgia. The document is meant to be a supplement to the potential HSRA I release notification for this property.

The subject property is located within the Ridge and Valley Physiographic Province of Georgia, in an area that is mapped as having average or high groundwater pollution susceptibility. Therefore, under the Georgia EPD HSRA regulations, the water usage survey for this property involves an investigation of drinking water sources to a 3.0-mile radius from the subject property. The following tasks were completed during this water usage survey:

- A site and area reconnaissance was completed to identify potential private water wells within the general site vicinity (to about 0.5 miles),
- Interviews were conducted with representatives of the Rome Georgia Water Department, the Floyd County Water Department, and Berry College to identify the sources of drinking water and locations of wells,
- A water usage report for the site vicinity was obtained from Environmental. Data Resources, and
- Online information was reviewed to identify the water sources for the area.

Public Water Supplies

Three public water systems were identified within a three-mile radius of the subject property. Those include the City of Rome, Floyd County and Berry College. Etowah contacted representatives of each of the local water systems.

City of Rome Water Department

According to Mr. Jeff Wenzle of the City of Rome Water Department, the two sources of drinking water for the City of Rome are the Oostanaula River and the Etowah River. The water intake for the Oostanaula River is located approximately 0.5-mile northeast of the subject property. The intake structure is located on the east side of the river, upstream from the subject property. The intake on the Etowah River is located approximately 1.4 miles southeast of and upstream from the subject property.

Floyd County Water Department

According to Mr. Brian Paris of the Floyd County Water Department, the County obtains drinking water from a spring in the City of Cave Spring and from a well on Kingston Highway. Cave Spring is located approximately 15 miles from the subject property. The well on Kinston Highway is located at the southwest quadrant of the intersection of Kingston Highway and the Rome By-Pass Highway approximately 3.25 miles from the subject property. No other wells or springs are currently used by the Floyd County Water Department.

Berry College

Portions of the Berry College campus lie within 1.5 miles from the subject property. According Mr. David Goddard, the Water Works Supervisor for Berry College, the college obtains drinking water from the Berry reservoir. The reservoir is located approximately 9 miles from the subject property. Mr. Goddard stated that no water wells are used by the Berry College water works.

Private Water Supplies

The area within a 3.0-mile radius of the subject property contains many private residences within the City of Rome and outside of the city limits. As stated above, Etowah completed a site and area reconnaissance to identify potential private water wells within the general site vicinity (to about 0.5 miles). We noted that the areas within the 0.5 mile radius appeared to be served by the City of Rome Water Department. Other sources of information are as follows:

Rome-Floyd County GIS Database

Rome and Floyd County provide an online GIS mapping service that depicts the locations of water mains within the City and County. Etowah reviewed the GIS maps and we note

that the maps show that all areas within a 3-mile radius of the subject property are served by county and city water mains. Thus, water service is available to all residences and businesses within a 3.0-mile radius of the subject property.

Floyd County Environmental Health Department

According to Mr. Mike Pitts of the Environmental Health Department, no database of private water wells is maintained by the Floyd County Health Department.

Water Usage Survey Conclusions

The findings of this water usage survey are summarized as follows:

- The findings of the survey do not indicate that any public water wells or springs are present within a 3.0 mile radius of the subject property.
- The City of Rome operates two surface water intakes on rivers within a 3.0 mile radius of the subject property.
- A spring and a water well operated by the Floyd County Water Department lie beyond the 3.0 mile radius.
- The private residences and businesses within a 0.5-mile radius appear to be connected or have the potential to be connected the City of Rome water system.
- Public water supplies are available to all residential areas within a 3.0 mile radius of the subject property. We have found no information that any private wells exists within that 3.0 mile radius.

oOo

We appreciate the opportunity to work for you on this project. Please contact us if you have any questions or if we can be of further assistance.

ETOWAH ENVIRONMENTAL SERVICES, INC.



Dennis P. Popham, P.G.
Principal Environmental Consultant

6120.

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Georgia EPD

AUG 16 2013

ETRI

Response and Remediation Program

Environmental Technology Resources, Inc.

August 13, 2013

Mr. David Brownlee
Unit Coordinator
Georgia Environmental Protection Division
Response and Remediation Program
2 Martin Luther King Jr. Drive, SE
Suite 1154 East
Atlanta, Georgia 30334

Re: Supplemental Information
HSRA Release Notification
Alchemy South, Ltd.
1523 Cobb Industrial Drive
Marietta, Cobb County, Georgia

Dear Mr. Brownlee:

This letter provides the additional information requested in your July 2, 2013 letter pertaining to the release notification that was submitted for Alchemy-South, Ltd. dated June 11, 2013. Additional information was requested regarding the groundwater flow direction at the Alchemy-South, Ltd. site.

On August 6, 2013, three temporary groundwater monitoring wells were installed at the Alchemy-South, Ltd. site. The soil borings for the temporary wells were installed using a direct push rig. An approximate four-inch diameter boring was advanced to the desired depth. Soil samples were collected continuously using a dual tube sampling device during the boring installation.

The temporary monitoring wells were constructed using one-inch diameter, Schedule 40, threaded PVC pipe and screened with ten (10) feet of one-inch diameter, Schedule 40, threaded 0.010 slot PVC pipe. Five to ten feet of one-inch diameter, Schedule PVC well riser was used to extend the well to above ground surface. A portion of the well riser extends above the surrounding ground surface. A locking expansion cap was placed on the top of the open riser pipe.

A 20/30 sieve size silica sand was used to create a filter pack around the screen in the monitoring well. The sand extended to a height of one foot above the top of screen and was sealed with granulated bentonite clay to the surface. The bentonite was hydrated as it was added to the borehole. Table 1 provides specific information regarding the construction of each temporary monitoring well.

Table 1
Summary of Well Construction Information
Alchemy-South, Ltd.
1523 Cobb Industrial Drive, Marietta, Georgia

Monitoring Well Number	Date of Installation	Total Depth of Well (ft.)	Well Diameter	Screen Interval
TMW-1	August 6, 2013	15 feet	1-inch	10-15 feet
TMW-2	August 6, 2013	20 feet	1-inch	10-20 feet
TMW-3	August 6, 2013	20 feet	1-inch	10-20 feet

Well development was completed by purging the temporary wells with a peristaltic pump. A minimum of three well volumes were removed during well development.

Well construction diagrams for each temporary well are attached to this letter report. Figure 1 is a monitoring well location map showing the locations of the temporary monitoring wells.

POTENTIOMETRIC INFORMATION

On July 9, 2013, depth to groundwater measurements were made from each of the temporary wells. The measurements were made using an electronic water level indicator graduated in hundredths of feet. The measuring point was a fixed point at the top of the well casing on the temporary wells.

Relative top of casing elevations for each monitoring well were determined using a transit level. Using the top of casing elevations along with depth to water readings allowed the determination of the relative groundwater elevations in each monitoring well. Table 2 summarizes the top of casing elevations, depth to water readings and groundwater elevations for the three temporary monitoring wells.

Table 2
Top of Casing, Depth to Water and Groundwater Elevations
Alchemy-South, Ltd.
1523 Cobb Industrial Drive, Marietta, Georgia

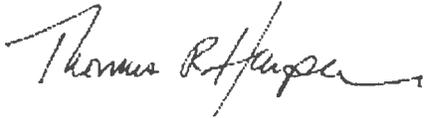
Monitoring Well Number	Date	Top of Casing Elevation (ft)	Depth to Water (ft)	Groundwater Elevation (ft)
TMW-1	July 9, 2013	78.83	1.78	77.05
TMW-2	July 9, 2013	100	16.66	83.34
TMW-3	July 9, 2013	94.20	14.12	80.08

The direction of groundwater flow was determined to be to the south-southeast. A copy of the potentiometric map for the July 9, 2013 groundwater gauging event is included as Figure 2.

Supplemental HSRA Notification Information
Alchemy South, Ltd.
1523 Cobb Industrial Drive, Marietta, Georgia
Page 3

Please call me at (770) 888-8181 if you have any questions regarding the information provided.

Sincerely,
ENVIRONMENTAL TECHNOLOGY RESOURCES, INC.

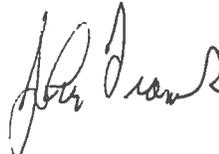


Thomas R. Harper
Technical Director

Attachment

Cc. Mr. Tom Welch, Alchemy-South, Ltd.

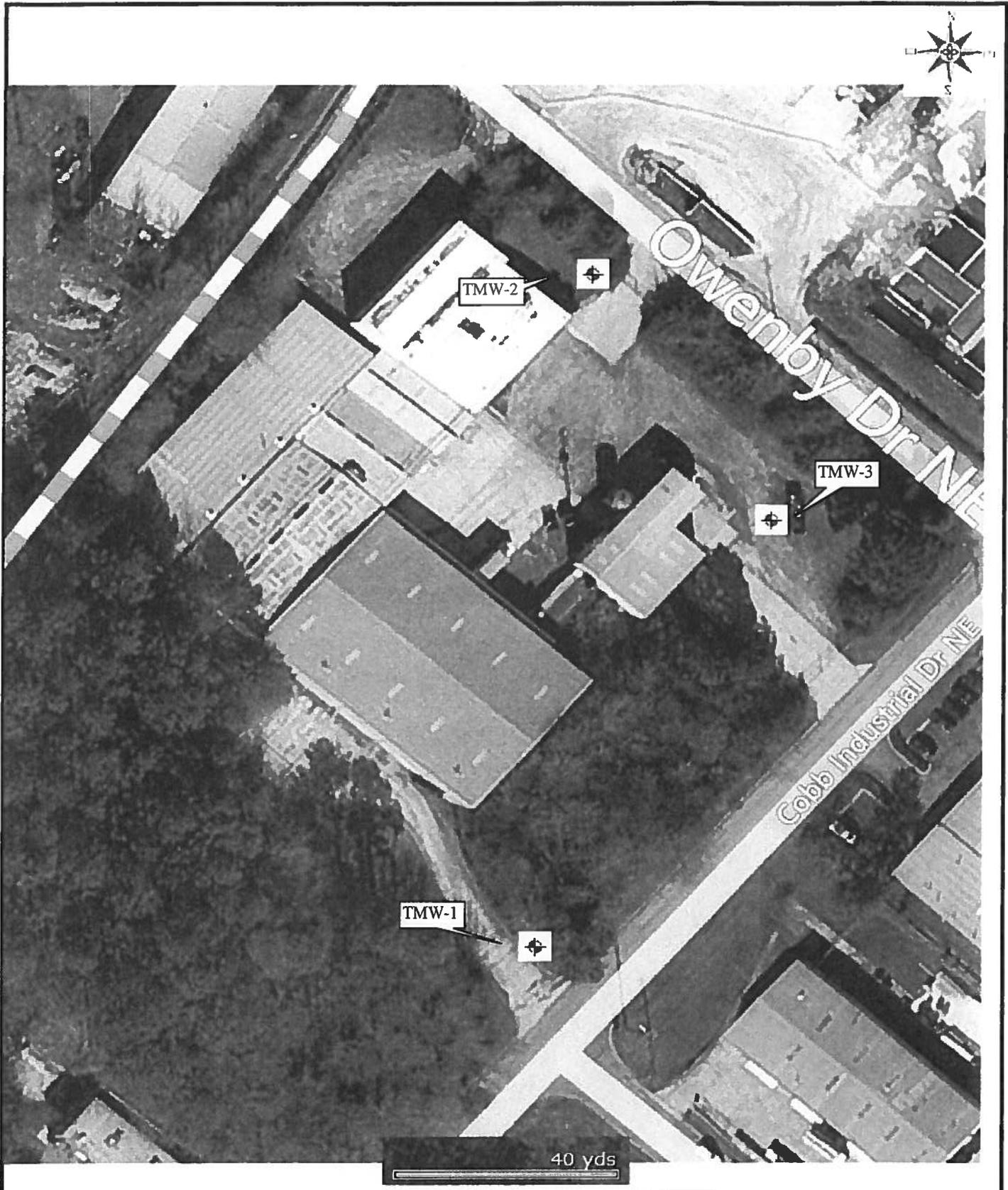
13-001.201



John W. Franck, P.G.
Project Geologist



Figures

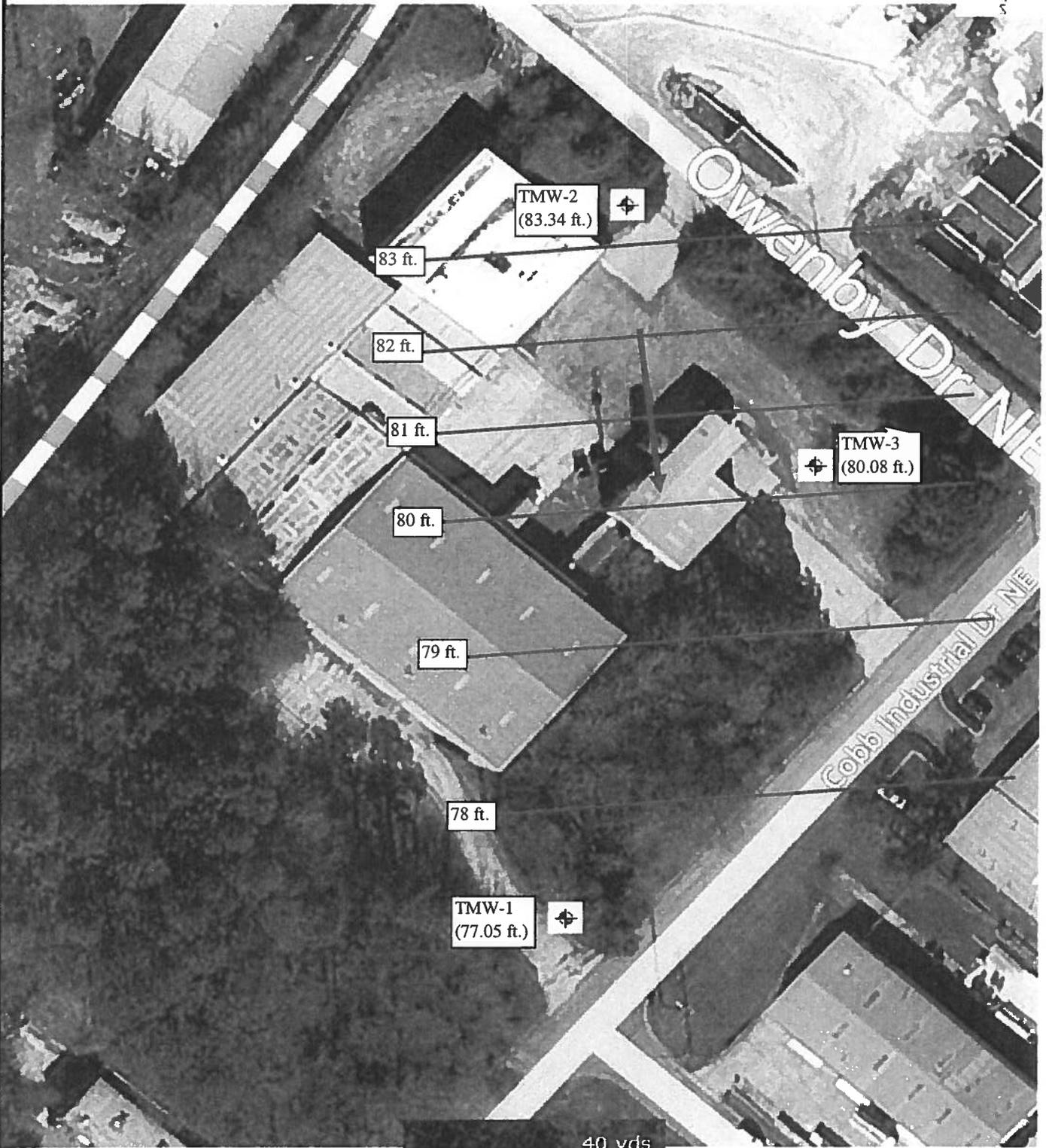


ETRI

Environmental Technology Resources, Inc.
 4780 Ashford Dunwoody Rd.
 Suite A-456
 Atlanta, Georgia 30338
 Scale: noted

FIGURE 1

TEMPORARY WELL LOCATION MAP
 1523 Cobb Industrial Drive
 Marietta, Georgia
 Project Number 13-001



Groundwater Flow Direction

ETRI

Environmental Technology Resources, Inc.
4780 Ashford Dunwoody Rd.
Suite A-456
Atlanta, Georgia 30338

Scale: noted

FIGURE 2
POTENTIOMETRIC MAP
1523 Cobb Industrial Drive
Marietta, Georgia

Project Number 13-001

Attachment – Well Construction Diagrams

ENVIRONMENTAL TECHNOLOGY RESOURCES, INC.

MONITORING WELL CONSTRUCTION DETAILS

PROJECT MANAGER: Tom Harper	SUPERVISING GEOLOGIST: John W. Franck, PG
PROJECT NAME: Alchemy-South, Ltd.	
PROJECT LOCATION: 1523 Cobb Industrial Drive, Marietta, Georgia	
MONITORING WELL NO.: TMW-1	DATE OF INSTALLATION: 8-6-2013

					<i>LOCKING EXPANSION CAP</i>	RISER EXTENDS 0.68 FT. ABOVE GROUND SURFACE
					<i>WELL RISER</i> MATERIAL: DIAMETER: JOINT TYPE: LENGTH: <i>SECOND SEAL</i> TYPE OF SEAL: THICKNESS:	PVC <u>1 INCH</u> <u>FLUSH THREADED</u> <u>5 FEET</u> NONE
					<i>FIRST SEAL</i> TYPE OF SEAL: THICKNESS:	<u>BENTONITE</u> <u>4.32 FEET</u>
					<i>FILTER PACK</i> TYPE OF FILTER: DISTANCE ABOVE SCREEN:	<u>BLASTING SAND 20/30</u> <u>1.0 FEET</u>
					<i>WELL SCREEN</i> SCREEN MATERIAL: DIAMETER: LENGTH: SLOT SIZE:	PVC <u>1 INCH</u> <u>10 FEET</u> <u>0.010 INCHES</u>
					<i>DEPTH TO BOTTOM OF MONITORING WELL:</i>	<u>15 FEET</u>
					<i>DEPTH TO BOTTOM OF FILTER SAND:</i>	<u>15 FEET</u>

ENVIRONMENTAL TECHNOLOGY RESOURCES, INC.

MONITORING WELL CONSTRUCTION DETAILS

PROJECT MANAGER: Tom Harper	SUPERVISING GEOLOGIST: John W. Franck, PG
PROJECT NAME: Alchemy-South, Ltd.	
PROJECT LOCATION: 1523 Cobb Industrial Drive, Marietta, Georgia	
MONITORING WELL NO.: TMW-2	DATE OF INSTALLATION: 8-6-2013

					<i>LOCKING EXPANSION CAP</i>	RISER EXTENDS 0.44 FT. ABOVE GROUND SURFACE
					<i>WELL RISER</i> MATERIAL: DIAMETER: JOINT TYPE: LENGTH: <i>SECOND SEAL</i> TYPE OF SEAL: THICKNESS:	PVC <u>1 INCH</u> <u>FLUSH THREADED</u> <u>10 FEET</u> NONE
					<i>FIRST SEAL</i> TYPE OF SEAL: THICKNESS:	<u>BENTONITE</u> <u>9.56 FEET</u>
					<i>FILTER PACK</i> TYPE OF FILTER: DISTANCE ABOVE SCREEN:	<u>BLASTING SAND 20/30</u> <u>1.0 FEET</u>
					<i>WELL SCREEN</i> SCREEN MATERIAL: DIAMETER: LENGTH: SLOT SIZE: <i>DEPTH TO BOTTOM OF MONITORING WELL:</i>	PVC <u>1 INCH</u> <u>10 FEET</u> <u>0.010 INCHES</u> <u>20 FEET</u>
					<i>DEPTH TO BOTTOM OF FILTER SAND:</i>	<u>20 FEET</u>

ENVIRONMENTAL TECHNOLOGY RESOURCES, INC.

MONITORING WELL CONSTRUCTION DETAILS

PROJECT MANAGER: Tom Harper	SUPERVISING GEOLOGIST: John W. Franck, PG
PROJECT NAME: Alchemy-South, Ltd.	
PROJECT LOCATION: 1523 Cobb Industrial Drive, Marietta, Georgia	
MONITORING WELL NO.: TMW-3	DATE OF INSTALLATION: 8-6-2013

					<i>LOCKING EXPANSION CAP</i>	RISER EXTENDS 0.77 FT. ABOVE GROUND SURFACE
					<i>WELL RISER</i> MATERIAL: DIAMETER: JOINT TYPE: LENGTH: <i>SECOND SEAL</i> TYPE OF SEAL: THICKNESS:	<u>PVC</u> <u>1 INCH</u> <u>FLUSH THREADED</u> <u>10 FEET</u> <u>NONE</u>
					<i>FIRST SEAL</i> TYPE OF SEAL: THICKNESS:	<u>BENTONITE</u> <u>9.23 FEET</u>
					<i>FILTER PACK</i> TYPE OF FILTER: DISTANCE ABOVE SCREEN:	<u>BLASTING SAND 20/30</u> <u>1.0 FEET</u>
					<i>WELL SCREEN</i> SCREEN MATERIAL: DIAMETER: LENGTH: SLOT SIZE: <i>DEPTH TO BOTTOM OF MONITORING WELL:</i>	<u>PVC</u> <u>1 INCH</u> <u>10 FEET</u> <u>0.010 INCHES</u> <u>20 FEET</u>
					<i>DEPTH TO BOTTOM OF FILTER SAND:</i>	<u>20 FEET</u>



August 20, 2013

RECEIVED
Georgia EPD

AUG 21 2013

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

Response and Remediation Program

Re: Citgo Food Mart
7046 Covington Highway
Lithonia, (DeKalb County) Georgia

Dear Sir or Madam,

In keeping with Georgia Hazardous Site Response Act regulations, please accept this Initial Release Notification for the above-referenced property in DeKalb County. LOGIC is submitting this release notification on behalf of the property owner, who is in the process of securing financing on the property. Groundwater at the property has been impacted by Tetrachloroethene at concentrations exceeding its MCL. The solvents appear to have originated from the former on-site Covington Cleaners dry cleaner that have operated from the easternmost suite (D) of the Citgo Food Mart shopping center from around 2002 until 2012.

Your prompt attention to this notification is greatly appreciated. Please let me know if you require any additional information for purposes of your review. Thank you for your time and attention.

Yours faithfully,

A handwritten signature in cursive script that reads "Angela Greenwalt".

Angela Greenwalt
Environmental Scientist

Enc.

Cc: Mr. George Kutty Varghese (with enc.)
Ms. Velina Williams, Quantum National Bank (with enc.)

6121

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

AUG 21 2013

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

Response and Remediation Program

PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)				
3	Tax Map and Parcel ID Number:	16 104 01 024	Acreage	1.93	
4	Site or Facility Name	Citgo Food Mart			
5	Site Street Address	7046 Covington Highway			
6	Site City	Lithonia	County	DeKalb	Zip 30058
7	Property Owner	United Business, LLC			
8	Property Owner Mailing Address	2125 Parliament Drive			
9	Property Owner City	Lawrenceville	State	Georgia	Zip 30043
10	Property Owner Telephone No.				
11	Site Contact Person	George Kutty Varghese	Title		
12	Site Contact Company Name	United Business, LLC			
13	Site Contact Mailing Address	2125 Parliament Drive			
14	Site Contact City	Lawrenceville	State	Georgia	Zip 30043
15	Site Contact Telephone No.	678-234-4122			
16	Facility Operator Contact Person	George Kutty Varghese	Title		
17	Facility Operator Company Name	Citgo Food Mart			
18	Facility Operator Mailing Address	7046 Covington Highway			
19	Facility Operator City	Lithonia	State	Georgia	Zip 30058
20	Facility Operator Telephone No.	770-918-4343			

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)

GEORGEKUTTY VARGHESE

TITLE

OFFICER

SIGNATURE

George Kutty Varghese

DATE

08/20/2013

Revised May 2008

PART II -- RELEASE INFORMATION

Page 2 of 5

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

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

The release appears to have originated from the historical spillage of tetrachloroethylene ("perc") in and around the east suite (Suite D) of the Citgo Market shopping center previously occupied by Covington Cleaners. The suite was occupied by the dry cleaner from around 2002 through approximately 2012.

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 and quantity are unknown. The physical state of the released material is presumed to be liquid.

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

The investigation during which this contamination was identified is described in the accompanying narrative. No steps have been taken to remediate this release.

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

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

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

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.

No contamination was detected in the soil samples collected.

PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

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

Less than 300 feet
 301 to 1000 feet

1001 to 3000 feet
 3001 to 5280 feet

Greater than 1 mile

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

Name: Residence

Address: 6363 Wellington Walk Way, Lithonia, GA

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

Less than 0.5 miles
 0.5 to 1 mile

1 to 2 miles
 2 to 3 miles

Greater than 3 miles

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

Name: _____

Address: _____

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

Yes No

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

REQUIRED ATTACHMENTS

9. SITE SUMMARY

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

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

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

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

CITGO FOOD MART
7046 COVINGTON HIGHWAY, LITHONIA, DEKALB COUNTY, GEORGIA
HSRA INITIAL RELEASE NOTIFICATION
SITE SUMMARY & GROUNDWATER RECEPTOR SURVEY

The subject site is a 2.2-acre property located in Southeast Dekalb County. (See Figures 1 & 2.) The site supports a Citgo Food Mart shopping center occupied by a convenience store and other retail businesses. The easternmost suite (Suite D) was occupied from approximately 2002 to 2012 by Covington Cleaners dry cleaner. At the time of LOGIC's investigation, the suite had been vacant for approximately one year.

The site is located in an area characterized by mixed residential and commercial development. Adjoining properties at the time of LOGIC's investigation includes residences, vacant property, a daycare and multiple auto body shops and scrap yards.

On August 1, 2013, LOGIC completed a Phase II investigation of the property. Two soil and three groundwater samples were collected from the area northeast, east and south (downgradient) of the former dry cleaning suite using a direct-push unit. (See Figure 3.) Soil samples were collected from a depth of 18 feet below ground surface. All samples were analyzed for volatile organic compounds (EPA Method 8260) based upon the suspected prior use of solvents at the facility.

No soil contamination was identified. Tetrachloroethene was identified at 16 micrograms per liter ($\mu\text{g/L}$) and 13 $\mu\text{g/L}$ at locations B-1 and B-2, south and east of the suite, respectively. Complete analytical results and chain-of-custody documentation are attached.

GROUNDWATER RECEPTOR SURVEY

LOGIC performed a survey for potential drinking water receptors within a three-mile radius. The search area is entirely within Dekalb County, Georgia. No other municipalities were identified within one mile of the subject site. In the course of this survey, LOGIC contacted representatives from Dekalb County Department of Watershed Management, the municipal water department for the site and surrounding area, as well as the Dekalb County Health Department.

LOGIC's reviewed the Georgia Geological Survey publication "Ground Water in the Greater Atlanta Region, Georgia - Information Circular 63" (C.W. Cressler, et. al., 1983) and obtained a radius map and data from the U.S. Geological Survey (USGS) National Water Information System website. These sources showed four data gathering wells owned by the USGS were installed within a one mile of the subject site. However, no consumptive water wells were identified. LOGIC reviewed files from the Georgia Environmental Protection Division (EPD) for nearby facilities which have reported non-petroleum releases to the Hazardous Site Response Program. No relevant well data was identified. LOGIC conducted a driving reconnaissance of all streets within one-quarter mile of the subject site, as well as all major surface roads within one mile. The focus of this reconnaissance was to visually locate residential or commercial properties which had well sheds or aboveground water storage tanks.

LOGIC also surveyed the nearest surface water bodies to the subject site. This survey relied on published USGS topographic maps, aerial photographs and field reconnaissance. Based on existing topography, the closest potential surface water receptor is Bridge Creek, approximately two-tenths of a mile to the southwest. The subject site drains to the south, toward this stream and an intersecting unnamed tributary located to the south-southeast. According to the director of the Dekalb County Department of Watershed Management, the county water supply is the Chattahoochee River located outside of Dekalb County to the west.

Based upon LOGIC's investigation, no drinking water wells were known to be located within a three-mile radius of the subject site. The closest surface water receptor was Bridge Creek, approximately two-tenths of a mile to the southwest.

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

FIGURES



7046 COVINGTON HIGHWAY
LITHONIA, GEORGIA

LOGIC ENVIRONMENTAL, INC.
3242 AL DRIVE ♦ DULUTH, GA 30096

FIGURE 1 SITE LOCATION MAP

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1462 East, Atlanta, Georgia 30334

Environmental Protection Division

Judson H. Turner, Director

Land Protection Branch

Reply To:

Response Remediation Program

2 Martin Luther King, Jr. Drive, S.E.

Suite 1462, East Tower

Atlanta, Georgia 30334-9000

Office 404-657-8600 Fax 404-657-0807

August 22, 2013

Alchemy-South, LTD

c/o Tom Welch

1523 Cobb Industrial Drive

Marietta, GA 30066

RE: Release Notification

Alchemy-South, LTD

1523 Cobb Industrial Drive

Marietta, GA 30066

Dear Mr. Welch:

Pursuant to the Rules for Hazardous Site Response, specifically Rule 391-3-19-05(1) "Listing on the Hazardous Site Inventory," the Environmental Protection Division (EPD) has evaluated the above referenced property to determine whether a release exceeding a reportable quantity has occurred.

Based upon the information available to EPD at the time this evaluation was done, including your release notification that was submitted on May 15, 2013, and supplemental information dated August 16, 2013. EPD has no reason to believe that a release exceeding a reportable quantity has occurred at this property. The property was evaluated as having unlimited access, commercial use, with the nearest downgradient drinking water well being greater than one mile distant. Enclosed is a copy of our inspection report, recommendation memorandum, and Reportable Quantities Screening Method (RQSM) score sheet that summarize the conditions used to evaluate this property. Based on this information, this property will not be listed on the Hazardous Site Inventory.

As provided for in Section 391-3-9-04(4) of the Rules, the owner of the property must notify EPD if they become aware of any information not provided in the notification that should have been provided, or if they become aware of any information or events that suggest changes may have occurred in any of the conditions referenced in the attached documents. Please provide a copy of this letter and the attached documents to any person to which the title or an interest in this property is transferred. Please remove the two 55 gallon drums and scrap tires that are located on the property.

Please direct questions regarding this matter to Elise Chew of the Response and Remediation Program at 404-657-0488.

Sincerely,



David Brownlee

Unit Coordinator

Response and Remediation Program

Encl: Trip Report, RQSM Score sheet, Recommendation Memorandum

File: Non-HSI [Alchemy-South, LTD. Cobb County]

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, SE, Suite 1462 East, Atlanta, Georgia 30334

Environmental Protection Division

Judson H. Turner, Director

Land Protection Branch

Phone: 404/656-7802 FAX: 404/651-9425

August 22, 2013

MEMORANDUM

TO: David Brownlee 

FROM: Elise Chew 

Subject: Non- HSI Recommendation
Alchemy-South, Ltd.
1523 Cobb Industrial Drive
Marietta, Cobb County

Environmental Technology Resources, Inc. (ETRI) submitted a release notification dated May 15, 2013 for a property located at 1523 Cobb Industrial Drive, Marietta, Cobb County, Georgia. The initial notification indicates the presence of Acetone, Benzene, Chloroethane, Chloroform, Chloromethane, cis-1,2-Dichloroethene, Isopropylbenzene, MTBE and Trichloroethene in groundwater above notification concentrations. Due to a known drinking water well located within 0.5 miles west of the site, EPD requested in a letter dated July 2, 2013 to verify groundwater flow direction. The supplemental notification dated August 16, 2013 indicates that groundwater is flowing in a southeast direction.

The on-site pathway was scored as a suspected release (15) of isopropylbenzene (8) with unlimited access (4) and the nearest resident is 300 to 1000 feet away (4). Scoring the property for the on-site pathway results in a score of 20.0, which does not exceed the threshold criteria of (20).

The groundwater pathway was scored as a known release (45) of isopropylbenzene (8) with no MCL (3). The nearest downgradient drinking water well was scored as being greater than 1 mile distant from the site (4). Scoring the property for the groundwater pathway results in a score of 8.54, which does not exceed the threshold criteria.

The on-site and groundwater pathways do not exceed the threshold criteria; therefore, I recommend that Alchemy-South, Ltd. not be listed on the Hazardous Site Inventory.

**HAZARDOUS SITES RESPONSE PROGRAM
REPORTABLE QUANTITIES SCREENING METHOD**

SCORED BY:	Elise Chew	DATE:	8/22/2013
GROUNDWATER PATHWAY SCORE:	8.5	CLEANUP HISTORY:	
ON-SITE PATHWAY SCORE:	20.0	<input checked="" type="checkbox"/> NO CLEANUP INITIATED AT SITE <input type="checkbox"/> SOME CLEANUP UNDERWAY AT SITE <input type="checkbox"/> CLEANUP HAS BEEN COMPLETED	

EPA ID NUMBER:					
SITE OR FACILITY NAME:	Alchemy-South, Ltd				
SITE STREET ADDRESS:	1526 Cobb Industrial Drive				
SITE CITY:	Marietta	SITE COUNTY:	Cobb	ZIP CODE:	30066

IF SITE SCORES ABOVE THE THRESHOLD VALUE FOR EITHER PATHWAY, PROVIDE THE FOLLOWING INFORMATION. ALL REGULATED SUBSTANCES DETECTED AT THE SITE SHOULD ALSO BE LISTED ON PAGE 2, EXCLUDING THOSE USED TO SCORE THE SITE.

PROPERTY OWNER:					
MAILING ADDRESS:					
CITY:		STATE:		ZIP CODE:	
TELEPHONE NUMBER:					
SITE CONTACT PERSON:				TITLE:	
COMPANY NAME:					
MAILING ADDRESS:					
CITY:		STATE:		ZIP CODE:	
TELEPHONE NUMBER:					
SITE OWNER/OPERATOR:					
COMPANY NAME:					
MAILING ADDRESS:					
CITY:		STATE:		ZIP CODE:	
TELEPHONE NUMBER:					

HAS A RELEASE TO GROUNDWATER OCCURRED? Known (45) Suspected (10) Potential Future (5) (If 45, go to D)		SCORE	
		A.	45
SUSCEPTIBILITY RATING: Higher (6) Average (3) Lower (0)		1B.	0
PHYSICAL STATE: Stable Solid (0) Unstable Solid (1) Powder/Ash (2) Liquid/Gas/Sludge (3)		2B.	
CONTAINMENT: Very Good (0) Good (1) Fair (2) Poor (3)		C.	
REGULATED SUBSTANCE:	Isopropylbenzene	1D.	
TOXICITY: None (1) Low (1) (2) (4) (8) (16)		2D.	8
QUANTITY: (1) (2) (3) (4) (5) (6) (7) (8)		3D.	4
EXPOSURE TO GROUNDWATER RELEASE: (choose only one)		1E.	3
Known release ≥ MCL and know human exposure ≥ MCL (25)			
Known release ≥ MCL and suspected human exposure (20)			
Known release, no MCL exists, and know human exposure (18)			
Known release ≥ MCL, and known human exposure < MCL (15)			
Known release, no MCL exists, and human exposure is suspected (12)			
Suspected release and human exposure is suspected (8)			
Known release ≥ MCL, but no human exposure is suspected (4)			
Known release, no MCL exists, and no human exposure is suspected (3)			
Suspected release, but no human exposure is suspected (2)			
Potential future release (1)			
Known release less than MCL (0)			
DISTANCE TO WELL OR SPRING: <1/2 mile (16) 1/2 - 1 mile (9) 1 - 2 miles (4) 2 - 3 miles (1) > 3 miles (0)		2E.	4
GROUNDWATER PATHWAY SCORE:			8.5

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

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

$$\text{If } A = 45, \text{ then } M = 45$$

$$\text{If } 2D \text{ is unknown, then } 2D = 4$$

$$\text{If } 3D \text{ is unknown, then } 3D = 4$$

$$\text{If } 1E \text{ includes known or suspected human exposure, then } 1E + 2E = 16$$

$$\text{If } 1E = 0, \text{ then } 2E = 1$$

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

August 22, 2013

TRIP REPORT

Site Name & Location: Alchemy-South, Ltd.
1523 Cobb Industrial Drive
Marietta, Cobb County, Georgia

Trip By: David Brownlee, Unit Coordinator
Elise Chew, Environmental Compliance Specialist

Date of Trip: June 28, 2013

Persons Contacted: Tom Welch, Alchemy-South, Ltd. Owner

Reference: Site Visit

Comments:

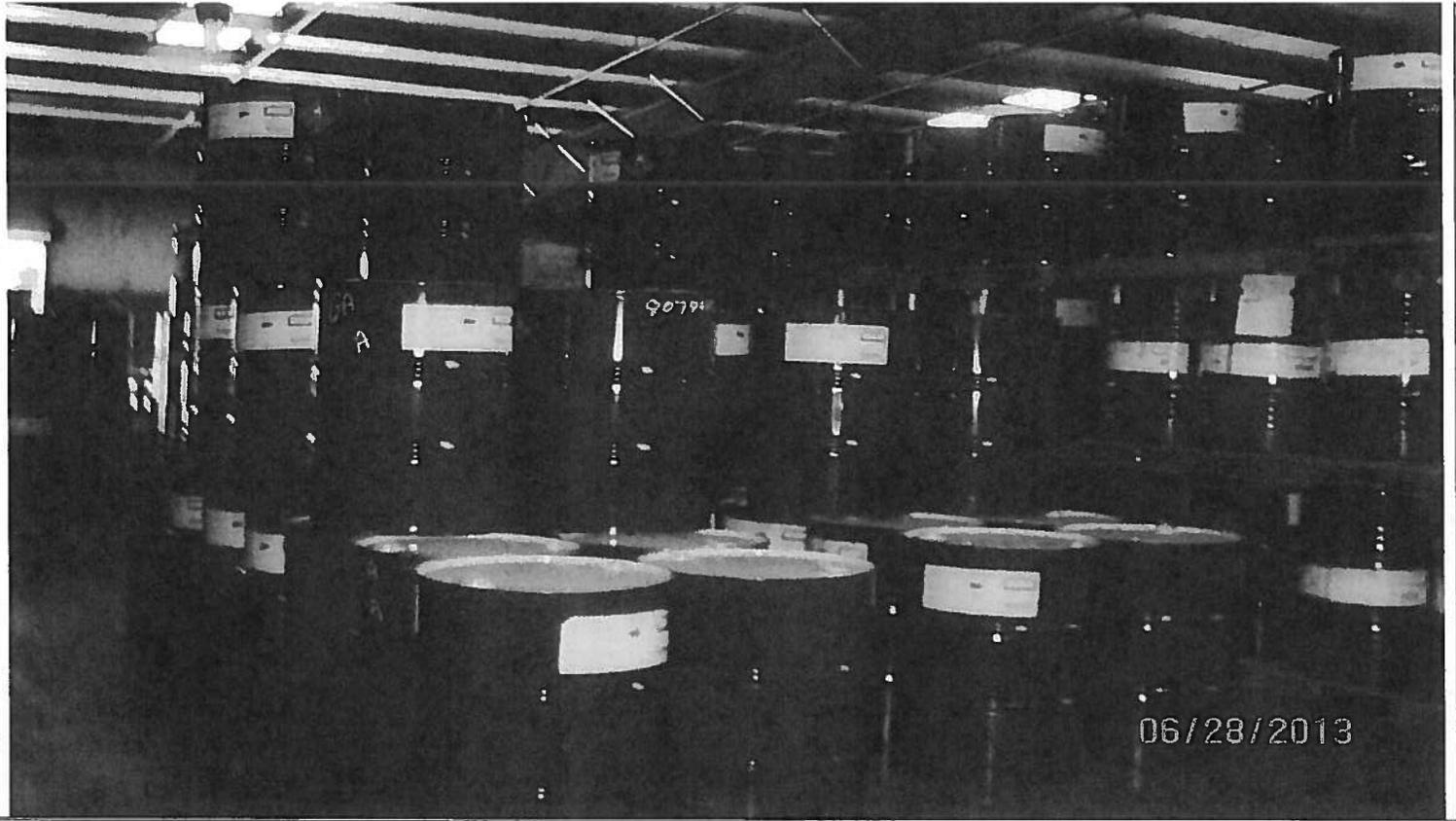
On June 28, 2013 David Brownlee and I performed a site inspection at 1523 Cobb Industrial Drive, Cobb County, Georgia. The release notification was submitted due to detections of VOCs in groundwater, which are above the respective Maximum Contaminant Levels (MCLs).

We met with owner Tom Welch and he was able to provide us with a tour of the site. We were able to confirm that the site is currently used as a chemical warehouse distribution facility with limited access. The warehouse consists of approximately 45000 square feet of office and storage for hazardous and non-hazardous materials (see photo template). We observed the storage area and noted what chemicals were being stored and observed potential source release. We walked the property and observed some of the sample locations. We inspected an area where previous underground storage tanks were located. Mr. Welch was able to provide us with the underground storage tank (UST) closure report from 1999. We confirmed that the nearest resident located at 1416 Canton Road, Marietta, GA. A previous trip report performed by David Hayes and Kristen Ritter-Rivera in 2011 confirmed domestic drinking water wells within 0.5 miles west of the subject site.

Recommendation:

Additional Information is required.

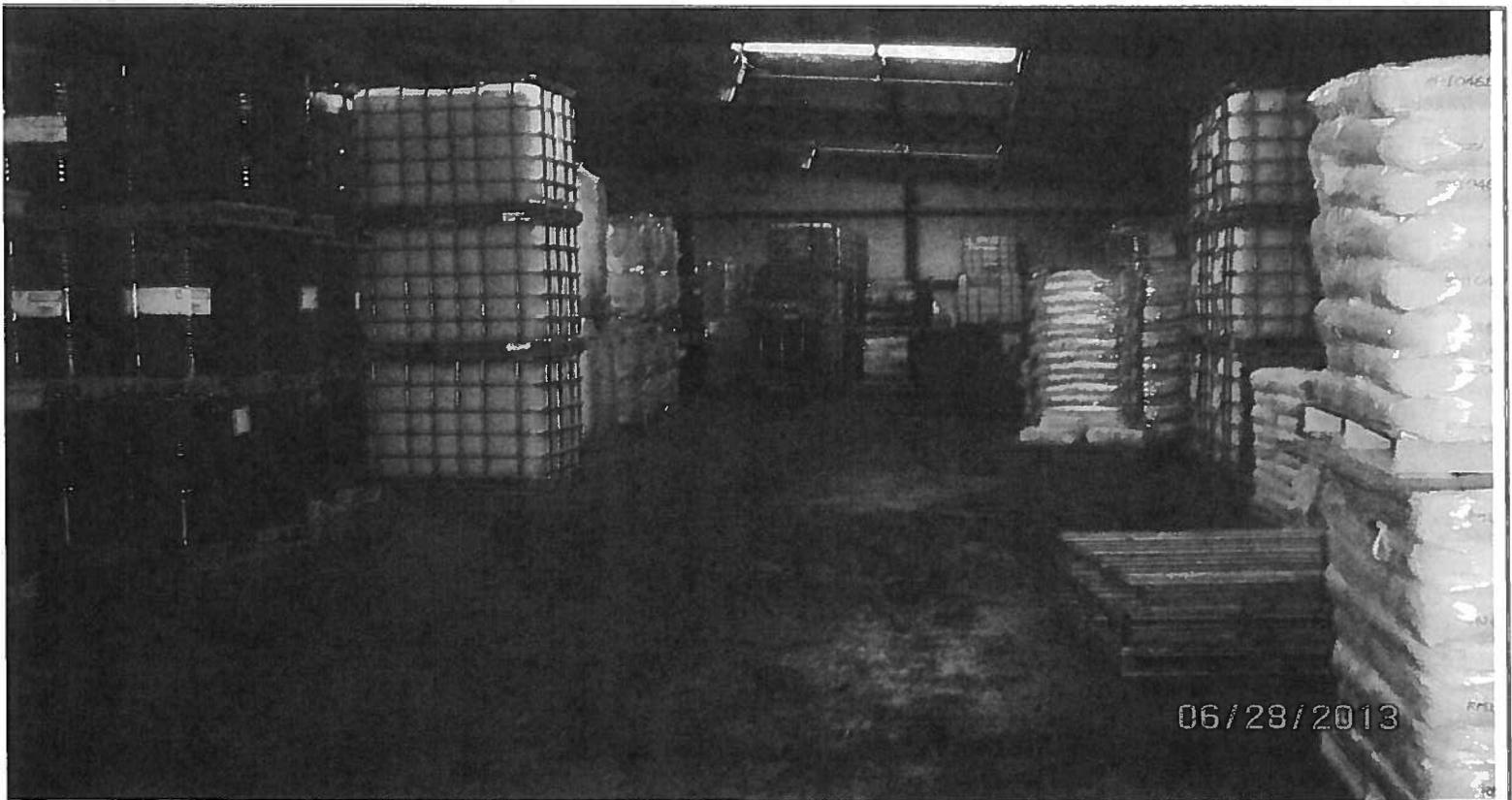
REVIEWED BY:  DATE: 8/22/13



County: Cobb Picture 1 Site Name: Alchemy-South, Ltd.

Date: June 28, 2013 Photographer: E. Chew Program: Response and Remediation Program

Explanation: Picture of drum storage area.



County: Cobb County Picture 2 Site Name: Alchemy-South, Ltd.

Date: June 28, 2013 Photographer: E. Chew Program: Response and Remediation Program

Explanation: Another view of storage and packing area of the warehouse.



County: Cobb

Picture 3

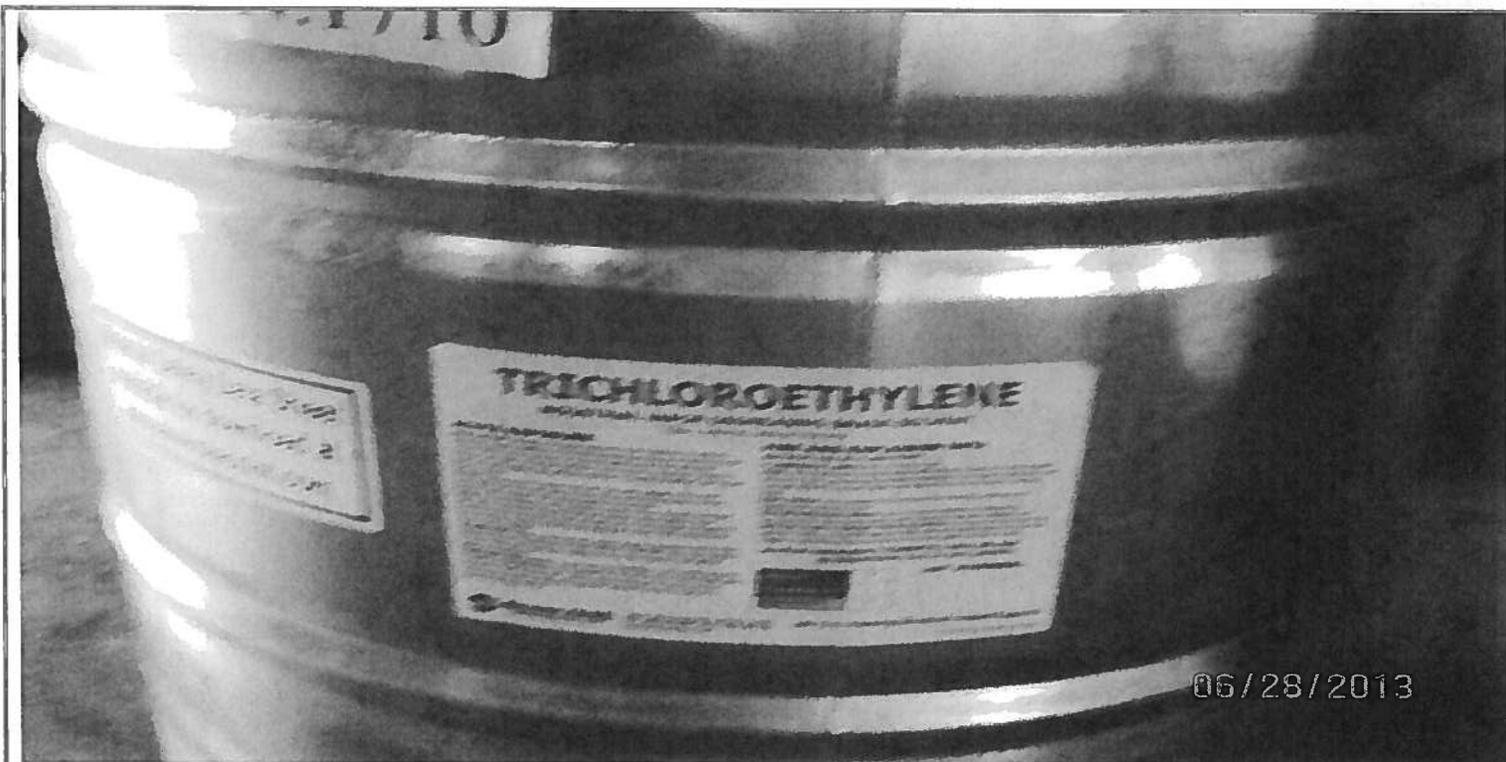
Site Name: Alchemy-South, Ltd.

Date: June 28, 2013

Photographer: E. Chew

Program: Response and Remediation Program

Explanation: area where product is mixed.



County: Cobb

Picture 4

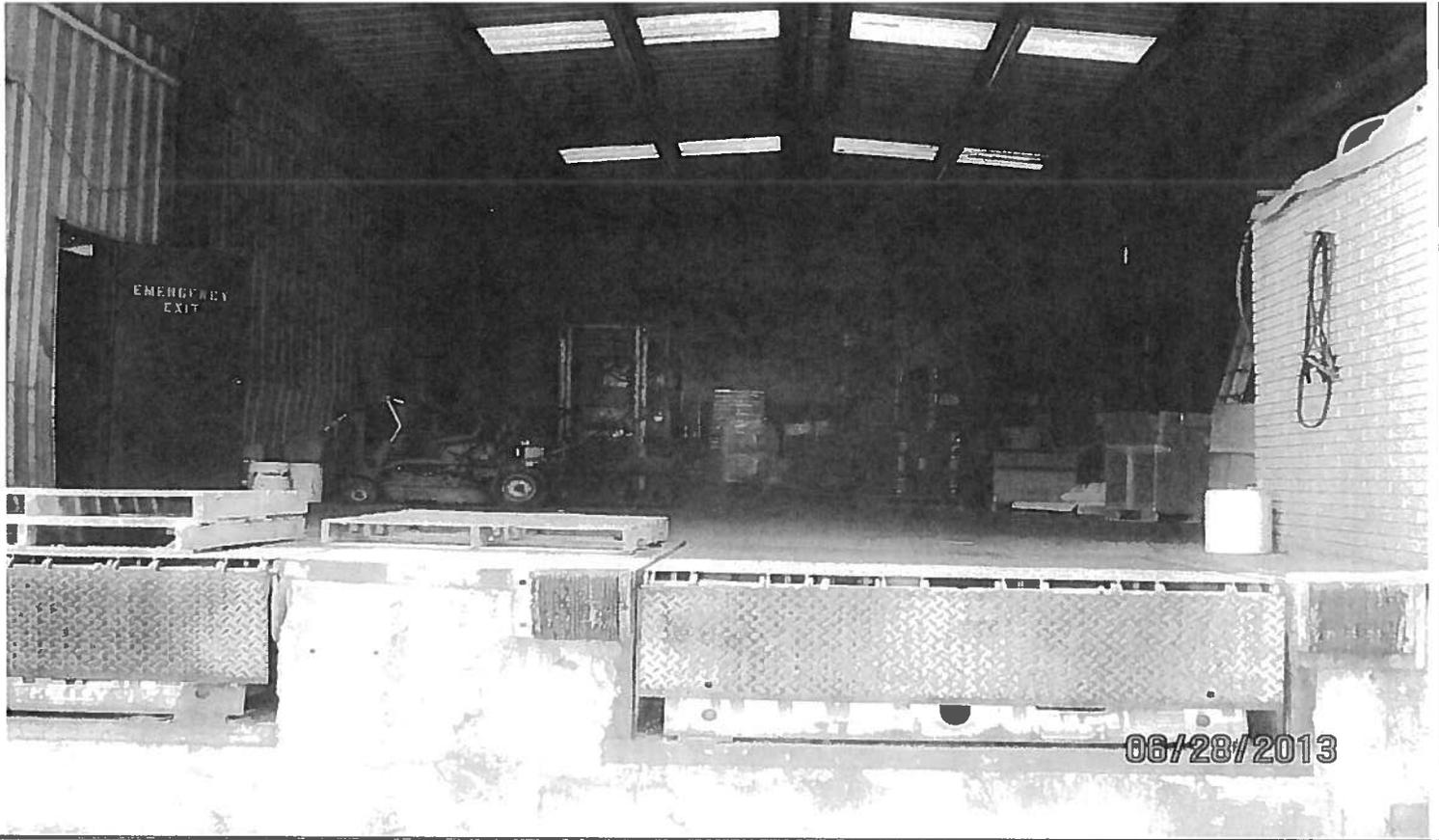
Site Name: Alchemy-South, Ltd.

Date: June 28, 2013

Photographer: E. Chew

Program: Response and Remediation Program

Explanation: Drums holding hazardous material were located on site



County: Cobb **Picture 5** **Site Name:** Alchemy-South, Ltd.

Date: June 28, 2013 **Photographer:** E. Chew **Program:** Response and Remediation Program

Explanation: Picture of loading area and sample location see figure.



County: Cobb County **Picture 6** **Site Name:** Alchemy-South, Ltd.

Date: June 28, 2013 **Photographer:** E. Chew **Program:** Response and Remediation Program

Explanation: Sample location see figure



County: Cobb County	Picture 7	Site Name: Alchemy-South, Ltd.
Date: June 28, 2013	Photographer: E. Chew	Program: Response and Remediation Program
Explanation: Area where underground storage tanks were once located		



County Cobb County	Picture 8	Site Name: Alchemy-South, Ltd.
Date: June 28, 2013	Photographer: E. Chew	Program: Response and Remediation Program
Explanation: area where previous gas pump was located.		



County: Cobb County Picture 22 of 25 Site Name: Alchemy-South, Ltd.

Date: June 28, 2013 Photographer: E. Chew Program: Response and Remediation Program

Explanation: Address of nearest resident.



County: Cobb County Picture 21 of 25 Site Name: Alchemy-South, Ltd.

Date: June 28, 2013 Photographer: E. Chew Program: Response and Remediation Program

Explanation: Picture of more drums.