

December 2, 2013

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

RE: HSRP Initial Release Notification  
**PolyStar LLC Tract**  
206, 208, & 216 Brookhollow Road SE  
Dalton, Whitfield County, Georgia  
Project No.: 2013.3847.02

Dear Mr. Williams:

Enclosed are the Hazardous Sites Response Program (HSRP) Release Notification form and supporting documents for the initial release notification on the above-referenced Project Site. Certain metals were identified in the groundwater and barium and carbon disulfide were identified in the soil above applicable notification concentrations.

Please note that the Prospective Purchaser of the Project Site is planning to enter the Project Site into Georgia Brownfield Program, and a Prospective Purchaser Corrective Action Plan (PPCAP) is expected to be submitted prior to Closing.

The following items are attached for your review:

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

The following Table summarizes the results of the RQSM scoring.

### RQSM PATHWAYS SCORE SUMMARY

Chemical Threshold	Groundwater Pathway Score	On Site Pathway
Barium	0	7.5
Chromium	0	Not applicable
Nickel	8.13	Not applicable
Selenium	0	Not applicable
<b>Notes:</b> NA: Not applicable RQSM Scoring included in Attachment D.		

Based on the information presented, United Consulting respectfully recommends that the Project Site not be listed on the Hazardous Site Inventory (HSI).

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

Sincerely,

#### UNITED CONSULTING



Seth H. Hobson  
Senior Environmental Specialist



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

SHH/RCG/tl

SP: 2013.3847.01.notification.doc

6150

# 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

DEC 3 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)	GAR000033613			
3	Tax Map and Parcel ID Number:	13-026-01-005, 13-026-09-000, and 13-26-17-000	Acreage	7.1	
4	Site or Facility Name	Polystar LLC			
5	Site Street Address	206, 208, & 216 Brookhollow Road SE			
6	Site City	Dalton	County	Whitfield	Zip 30721
7	Property Owner	Cofield Family, LLLP			
8	Property Owner Mailing Address	1815 South Hamilton Street			
9	Property Owner City	Dalton	State	GA	Zip 30720
10	Property Owner Telephone No.	706-712-8024			
11	Site Contact Person	Russell Griebel	Title	Associate Environmental Specialist	
12	Site Contact Company Name	United Consulting			
13	Site Contact Mailing Address	625 Holcomb Bridge Road			
14	Site Contact City	Norcross	State	GA	Zip 30071
15	Site Contact Telephone No.	770-582-2788			
16	Facility Operator Contact Person	Kevin Harris	Title	Chief Financial Officer	
17	Facility Operator Company Name	PolyStar LLC			
18	Facility Operator Mailing Address	206 Brookhollow Road SE			
19	Facility Operator City	Dalton	State	GA	Zip 30721
20	Facility Operator Telephone No.	706-712-8024			

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.

Charles Cofield

General Manager

NAME (Please type or print)

TITLE

*Charles Cofield*

12-2-13

SIGNATURE

DATE

## PART II -- RELEASE INFORMATION

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

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

The source for these detections is unknown. The operational history of the Project Site is not known to include these constituents. Barium, chromium, nickel, selenium, and carbon disulfide are also naturally occurring.

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

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

Soil and groundwater sampling were performed in connection with a potential real estate transaction. Prior to Closing, the prospective purchaser of the Project Site is expected to enter the Project Site into the Brownfield Program.

**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 production area of the Project Site where the detections are located is surrounded by a chain link fence with access controlled by gates.

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

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

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

Soil detections above the NCs were identified at 3 boring locations. Two locations, with soil detections at 5 feet in depth, are covered with concrete. The third boring location, in a driveway area where the soil detection was at 20 feet in depth, is covered with approximately 8 inches of maintained gravel cover.

## PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

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

Less than 300 feet

301 to 1000 feet

1001 to 3000 feet

Greater than 1 mile

3001 to 5280 feet

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

Name: Unknown

Address: 686 Callahan 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

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: See attached Receptor Survey (Attachment C). No active drinking water wells were identified.

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>.





## ATTACHMENT 9A: Site Summary

The Project Site consists of three parcels of land totaling approximately 7.1 acres and is referenced by the addresses of 206, 208, & 216 Brookhollow Road SE in Dalton, Whitfield County, Georgia. According to the county records, the Project Site is referenced as Tax Parcel ID # 13-026-01-005, 13-026-09-000, and 13-26-17-000, respectively. The Project Site includes a production area where surfactants are blended and resins manufactured in reactor vessels. The general location of the Project Site is illustrated on Figure 9B1.

The Project Site is located in an industrial area of Dalton. Adjoining properties have a history of manufacturing, distribution, and/or repackaging that involve the use and storage of bulk quantities of chemical substances and petroleum products.

In connection with a pending real estate transaction, soil and groundwater testing was performed by the prospective purchaser, and included 14 soil borings and two groundwater monitoring wells. Soil and groundwater samples were analyzed for various parameters, including volatile organic compounds (VOCs), semi-VOCs (SVOCs), TAL metals, glycols, ethers, amines, alcohols, epichlorohydrin, pesticides, herbicides, and/or polychlorinated biphenols (PCBs). The locations of the samples collected are illustrated on Figure 9B2.

Based on the sampling, two HSRA regulated constituents were detected in soil above concentrations requiring release notification. Barium was identified in one soil sample (at a depth of 5 feet) and carbon disulfide was identified in three soil samples (at depths of 5, 5, and 20 feet).

Groundwater samples collected by the prospective purchaser had elevated turbidities, resulting in detections of certain metals and carbon disulfide. Therefore, confirmation groundwater sampling was performed at their two previous groundwater sampling locations (MW-01 and MW-03), and two new wells were installed and sampled (P-1 and P-2). This analysis showed concentrations of barium, chromium, nickel and selenium at elevated concentrations. Carbon disulfide was not detected in the re-sampling.

The source for these detections is unknown, and the operational history of the Project Site is not known to include use of these constituents. All of these constituents are also naturally occurring substances. A copy of the relevant analytical testing data sheets is included in Attachment B.

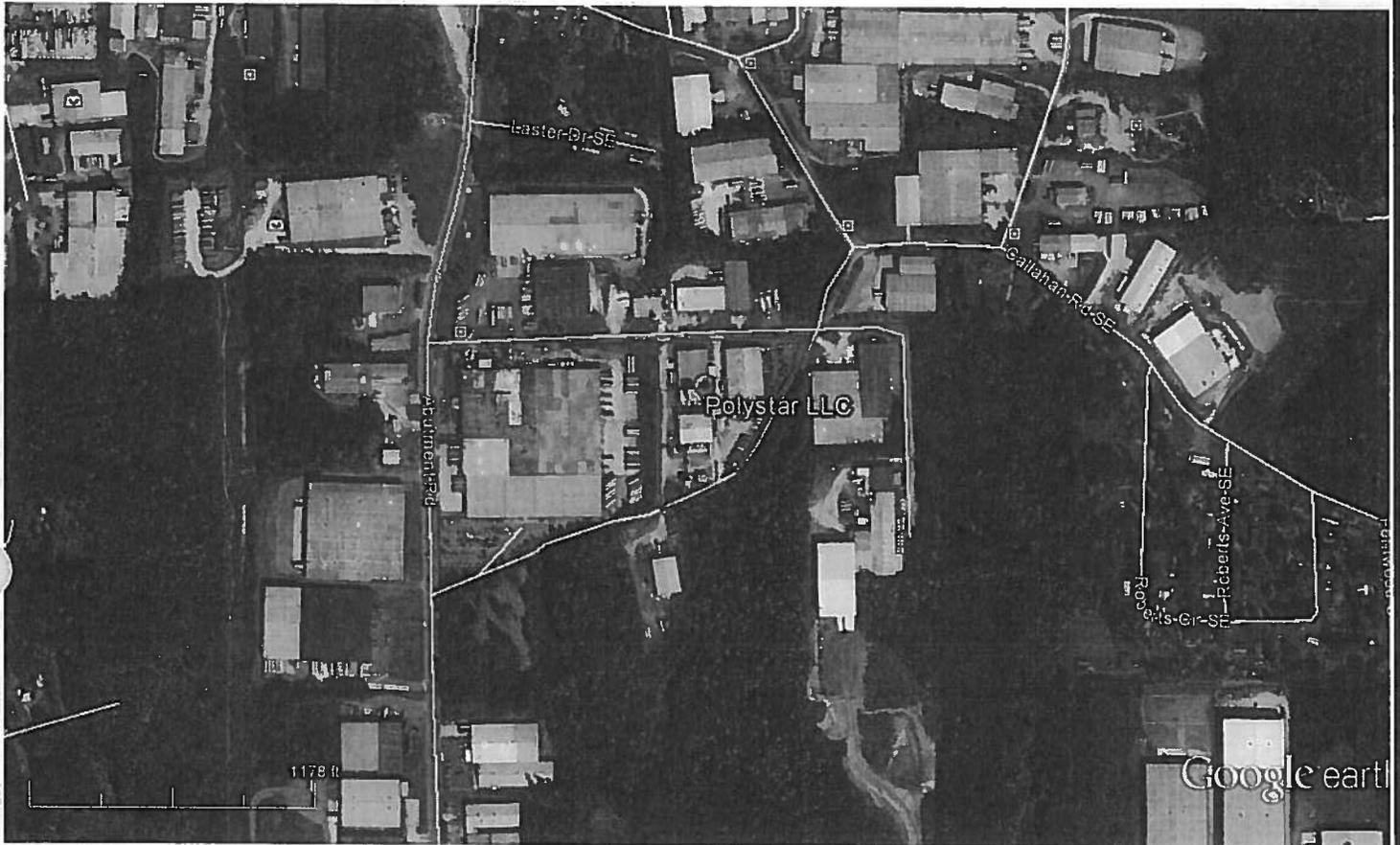
In addition, groundwater sampling by the prospective purchaser revealed the presence of petroleum constituents including 1-methylnaphthalene, 2-methylnaphthalene, naphthalene, and dibenz(a,h)anthracene in MW-01 and MW-03. These are constituents of diesel, which has been used at the Project Site. None of these constituents are considered to be reportable pursuant to HSRA.

Please note that the Prospective Purchaser of the Project Site is planning to enter the Project Site into the Georgia Brownfield Program. A Prospective Purchaser Corrective Action Plan (PPCAP) for the Project Site is expected to be submitted prior to Closing.

Based on United Consulting's receptor survey, no active drinking water wells were identified. In addition, based on observed hydrogeologic conditions, the groundwater exposure pathway to possible wells outside the 1-mile radius would be incomplete. The production area of the Project Site where the detections are located is surrounded by a chain link fence with access controlled by gates, making the area inaccessible. A copy of the receptor survey is included in Attachment C.

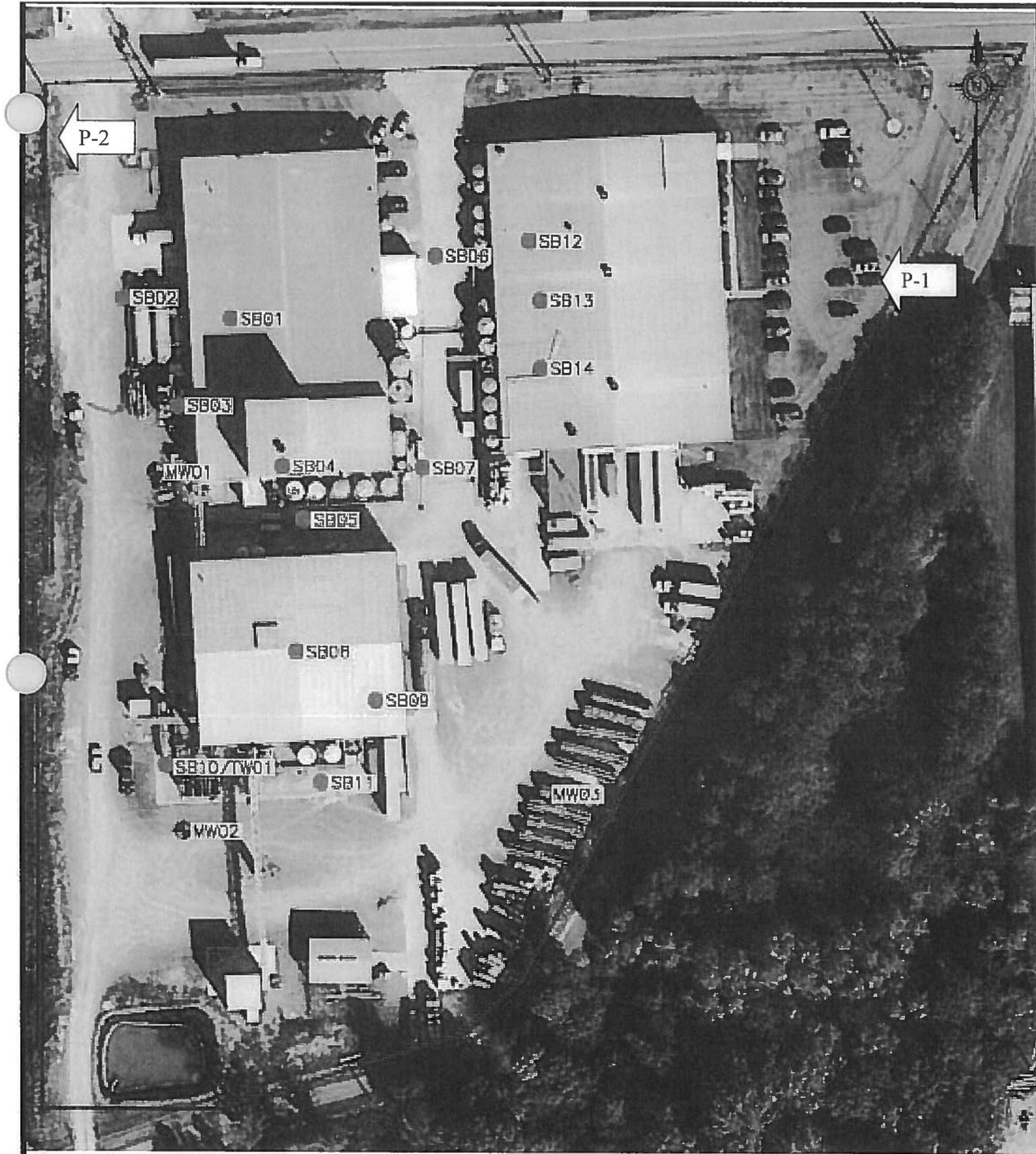
Based on the sampling data, United Consulting performed a calculation of the RQSM On Site Pathway for barium and carbon disulfide and a calculation of the RQSM Groundwater Pathway for barium, chromium, nickel, and selenium. Scoring justifications are included with the RQSM Calculations in Attachment D. Based on the scoring calculations; the On Site Pathway and Groundwater Pathway scores are below their thresholds of 20 and 10, respectively.

Based on the information provided in this notification, United Consulting respectfully recommends that the Project Site not be listed on the HSI.



Scale:	Bar Scale	Client:	PolyStar LLC
Prepared:	MA	Site:	PolyStar LLC Tract Dalton, Georgia
Checked:	RCG	Title:	Site Location Map
Project No.:	2013.3847.01		

**FIG.  
9B1**



Reference; from ENSAFE Phase I/II Environmental Site Assessment Report dated October 21, 2013  
 P-1 and P-2 installed and sampled by United Consulting in November 2013



Scale:	NTS	Client:	PolyStar LLC
Prepared:	MA	Site:	PolyStar LLC Tract Dalton, Georgia
Checked:	RG	Title:	Sample Location Plan
Project No.:	2013.3847.01		

**FIG.  
9B2**

6151

# 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

**COPY**

1. The information provided in this form is for:

- Initial Release Notification  
 Supplemental Notification

## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)				
3	Tax Map and Parcel ID Number:	14 010800070328 & 14 010800070310	Acreage	0.975 acres	
4	Site or Facility Name	West End Properties			
5	Site Street Address	576 Lee Street SW			
6	Site City	Atlanta	County	Fulton	Zip 30310
7	Property Owner	West End Properties, Inc.			
8	Property Owner Mailing Address	576 Lee Street SW			
9	Property Owner City	Atlanta	State	Georgia	Zip 30310
10	Property Owner Telephone No.	(404) 218-8407			
11	Site Contact Person	Ms. Margaret Mugula	Title	Owner	
12	Site Contact Company Name	West End Properties			
13	Site Contact Mailing Address	576 Lee Street SW			
14	Site Contact City	Atlanta	State	Georgia	Zip 30310
15	Site Contact Telephone No.	(404) 218-8407			
16	Facility Operator Contact Person	Ms. Margaret Mugula	Title	Owner	
17	Facility Operator Company Name	West End Properties			
18	Facility Operator Mailing Address	576 Lee Street SW			
19	Facility Operator City	Atlanta	State	Georgia	Zip 30310
20	Facility Operator Telephone No.	(404) 218-8407			

**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.

Ms. Margaret Mugula

Owner

NAME (Please type or print)

TITLE

SIGNATURE

DATE

*Margaret Mugula*

12-4-2013

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 tetrachloroethene ("perc") and possibly other chlorinated solvents, notably within the west portion of the subject site. According to the available historic information, the site supported a dry cleaners from the 1940s through approximately 2001. +

- 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.**

N/A

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

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

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

The soils were covered by approximately 4 inches of asphalt, with an approximately 4-inch-thick stone base beneath the asphalt.

## 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: Sky Lofts (Condos)

Address: 898 Oak Street, Atlanta, GA

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

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

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

Name: No wells identified within 3 miles

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.

N/A

## 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>.





**WEST END PROPERTIES**  
**576 LEE STREET SW, ATLANTA, GEORGIA**  
**HSRA INITIAL RELEASE NOTIFICATION - SITE SUMMARY**

The subject site is a 0.975-acre property located in Downtown Atlanta, in Central Fulton County. (See Figure 1.) The site, which includes two tax parcels, is located at the northeast corner of the intersection between Lee Street and Poole Place. (See Figure 2.) The site supports a two-story multi-tenant office/warehouse building, which supports several commercial operations. Current on-site businesses include a tire shop, a restaurant, a convenience store, a clothing store, a mosque, a nail salon, a dry cleaners, an alterations shop and a packaging company. According to the available historical information, the west parcel of the site supported a dry cleaners from the early 1940s through 2001. At the time of LOGIC's investigation, a drop-off dry cleaning service operated from the east parcel of the site, but no on-site dry cleaning was being conducted.

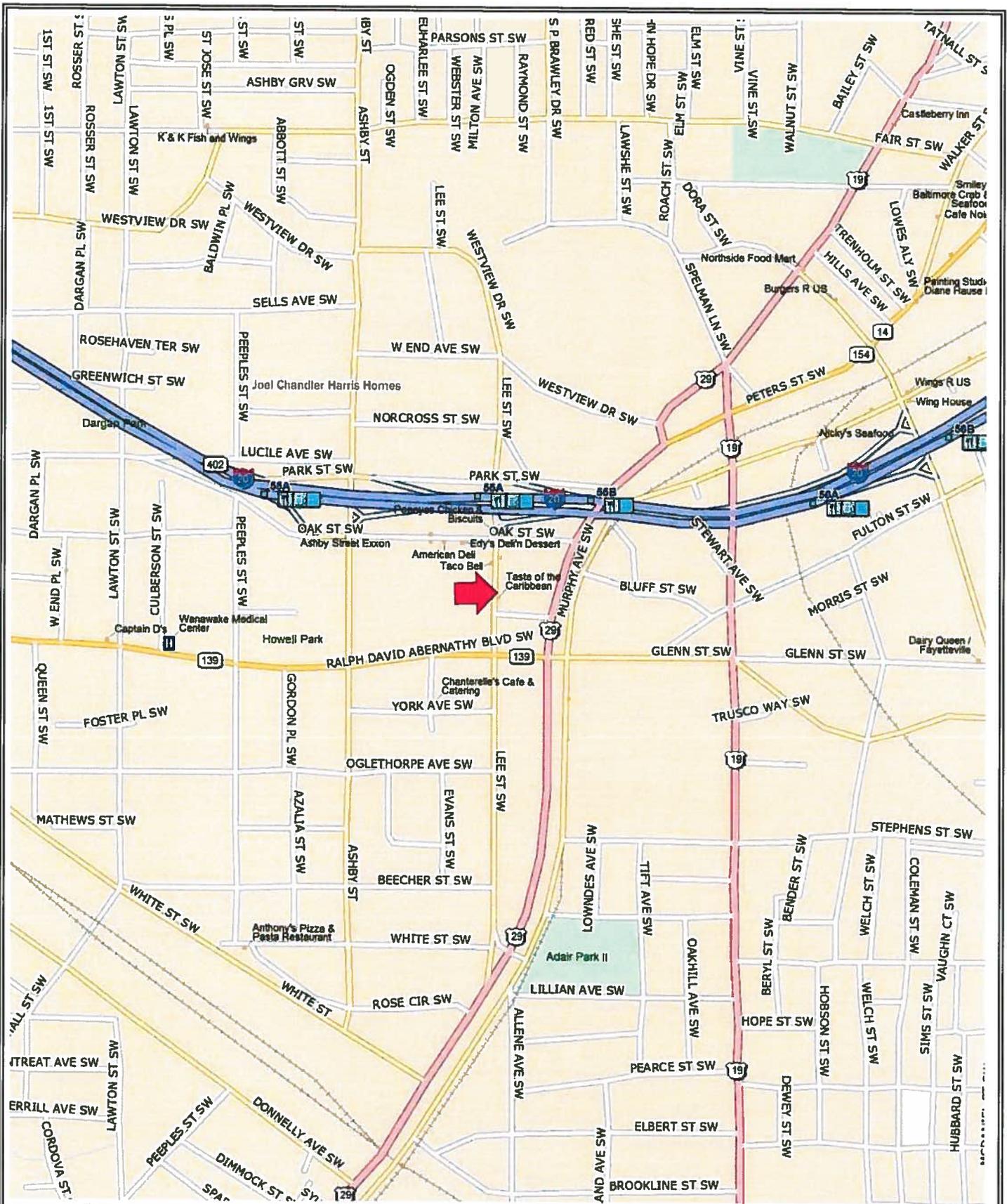
The site is located in an area characterized predominantly by commercial development, in addition to some residential and industrial use. Adjoining properties at the time of LOGIC's investigation included a shoe store and a used appliance shop to the north, and Whitehall Street and a railroad to the east. Poole Place was situated south of the site, with a bank further to the south. A shopping mall was located west of the site, on the west side of Lee Street.

On October 31, 2013, LOGIC completed a Phase II investigation of the property. Samples were collected in the vicinity of the on-site building, which had historically supported the former dry cleaning operation. Three soil and three groundwater samples were collected from three locations at the site, including one boring near the southwest corner of the building (B-1) and two borings (B-2 and B-3) installed east of the east side of the building. (See Figure 3.) All samples were analyzed for volatile organic compounds (EPA Method 8260) based upon the suspected prior use of solvents at the facility.

Tetrachloroethene was detected in the two soil samples collected east of the on-site building at concentrations of 0.14 mg/kg (in B-2-20') and 0.0062 mg/kg (in B-3-20'). These concentrations did not exceed the HSRA notification concentration of 0.18 mg/kg in soil. Groundwater contamination was identified in each of the three sample locations, designated as B-1, B-2 and B-3. Petroleum fractions were identified in sample B-3 and were attributed to former on-site underground storage tanks. Chloroform was identified in samples B-2 and B-3 at concentrations of 9.9 µg/L and 16 µg/L, respectively. Cis-1,2 Dichloroethene was identified in samples B-2 and B-3 at concentrations of 230 µg/L and 940 µg/L, respectively. Tetrachloroethene was identified at concentrations of 25 µg/L in B-1, at 9,800 in B-2 and at 65,000 µg/L in B-3. Trans-1,2-Dichloroethene was detected in B-3 at a concentration of 6.8 µg/L. Trichloroethene was identified at a concentration of 250 µg/L in B-2 and at 710 µg/L in B-3. Complete analytical results and chain-of-custody documentation are attached.

This survey included a review of well surveys conducted as part of prior HSRA Release Notifications in the vicinity of the site. No driving survey was performed for potential drinking water receptors within the area. However, it has been well documented in other HSRA investigations, that no drinking water receptors are located within a three-mile radius. No corrective action has been taken in response to this release and no imminent health threat is apparent.

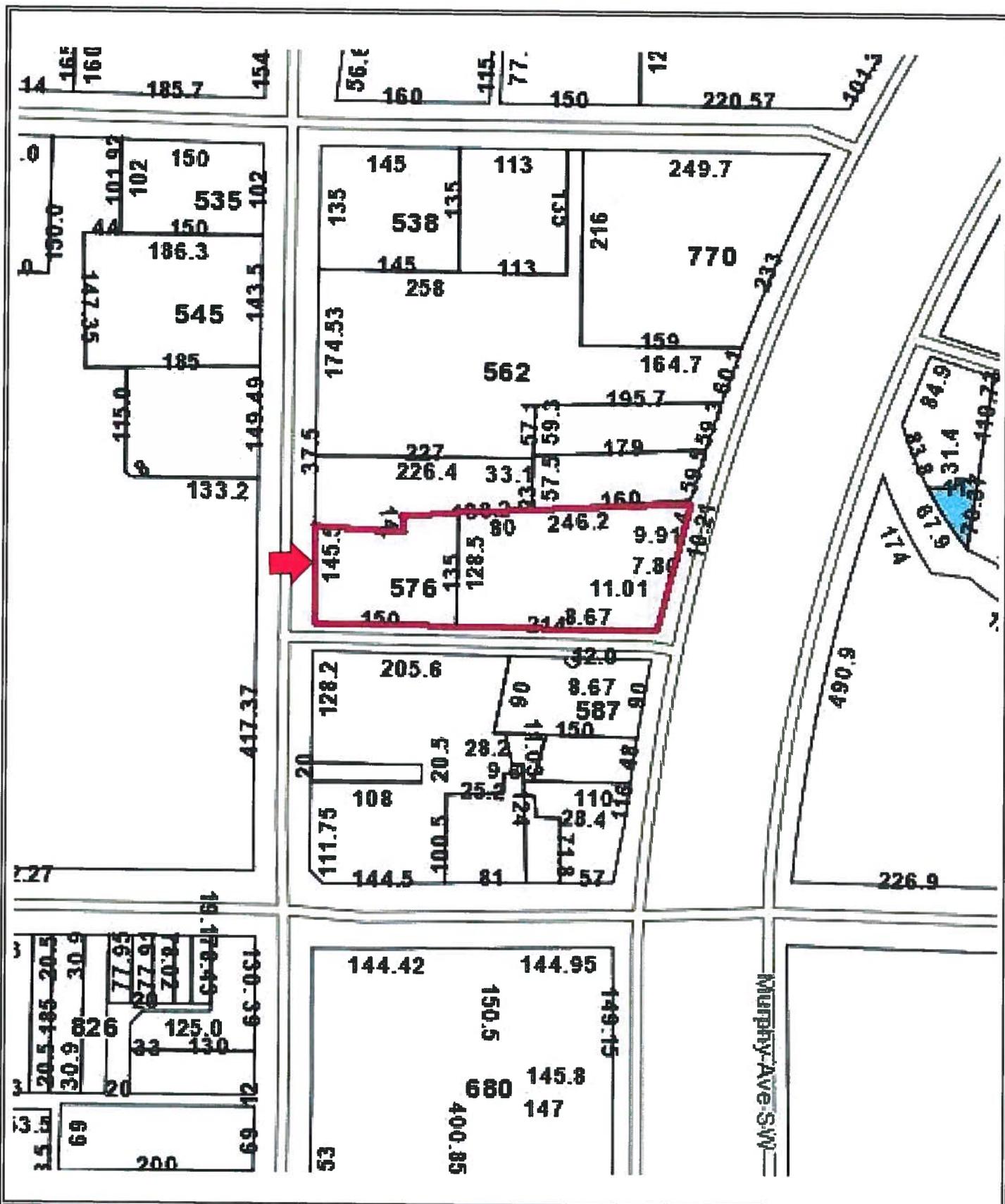
# FIGURES



576 LEE STREET SW  
ATLANTA, GEORGIA

LOGIC ENVIRONMENTAL, INC.  
3400 MCCLURE BRIDGE ROAD, SUITE F602 ♦ DULUTH, GA 30096

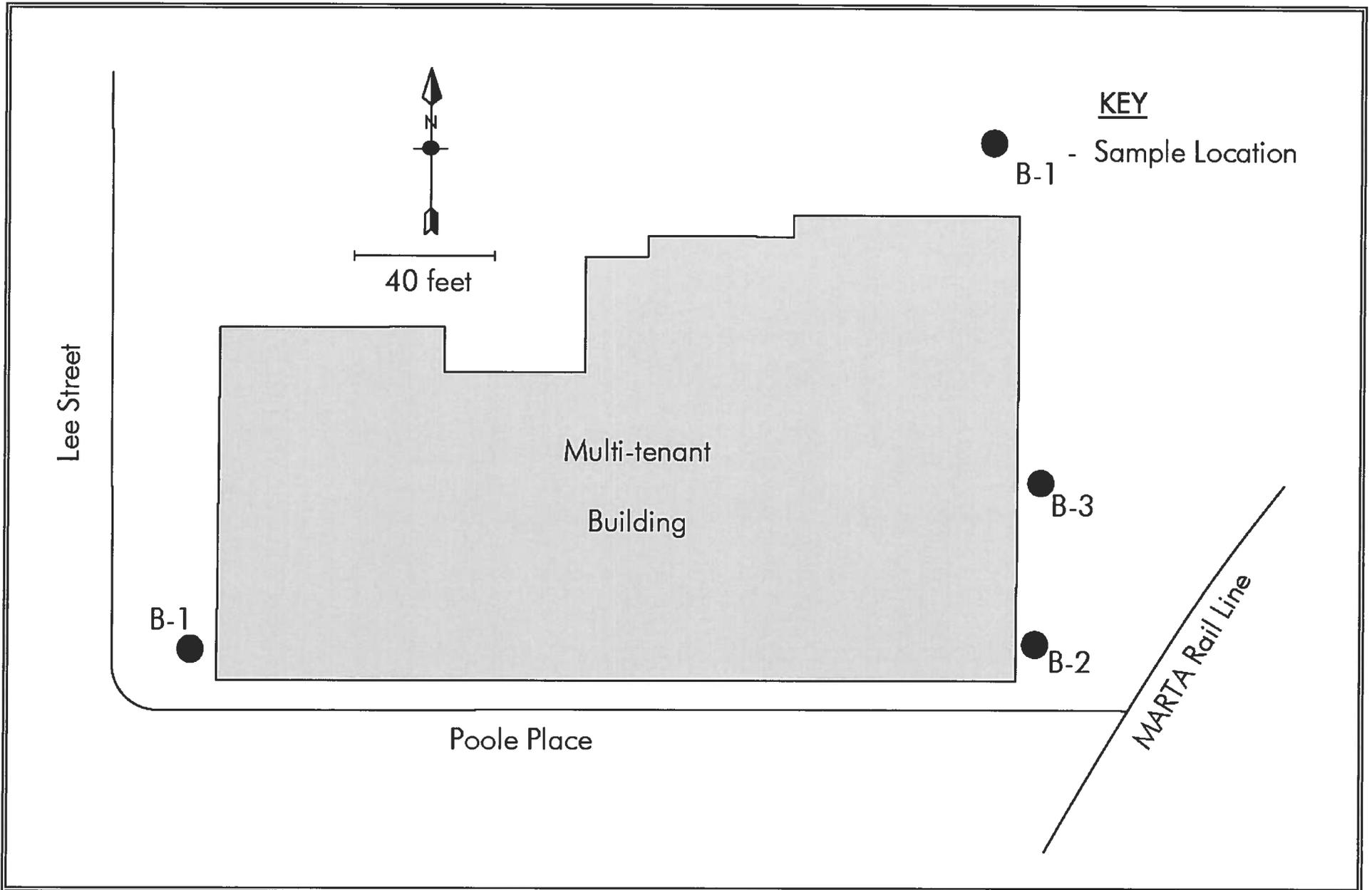
FIGURE 1 SITE LOCATION MAP



576 LEE STREET SW  
ATLANTA, GEORGIA

LOGIC ENVIRONMENTAL, INC.  
3400 MCCLURE BRIDGE ROAD, SUITE F602 ♦ DULUTH, GA 30096

FIGURE 2 TAX MAP



576 LEE STREET SW  
ATLANTA, GEORGIA

LOGIC ENVIRONMENTAL, INC.  
3400 MCCLURE BRIDGE ROAD, SUITE F602 ♦ DULUTH, GA 30096

FIGURE 3 SAMPLE LOCATION MAP





December 3, 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

Re: West End Properties  
576 Lee Street SW  
Atlanta, (Fulton County) Georgia

Dear Sir/Madam,

In keeping with Georgia Hazardous Site Response Act regulations, please accept this Initial Release Notification for the above-referenced property in Atlanta. LOGIC is submitting this release notification on behalf of the owner, West End Properties, Inc. Contaminants detected in soil were below the notification concentrations. Groundwater has been impacted by Chloroform, Cis-1,2-Dichloroethene, Tetrachloroethene, Trans-1,2-Dichloroethene and Trichloroethene. Only Cis-1,2-Dichloroethene, Tetrachloroethene and Trichloroethene were detected at concentrations exceeding their MCLs. The solvents appear to have originated from one (or more) of several dry cleaners that have operated from the west half of the subject site from around 1940 until 2001.

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 black ink, appearing to read "J. Schildecker", written in a cursive style.

Jenny Schildecker  
Environmental Scientist

Enc.  
Cc: Chris Fonzi  
Mike Tuohy

3400 MCCLURE BRIDGE ROAD • SUITE F602 • DULUTH • GA 30096  
PHONE • 770-817-0212 FAX • 770-817-0214

# 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

DEC 9 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:	MA02-002 and MA02-002-001	Acreage	30.42	
4	Site or Facility Name	Former Goodys Plant			
5	Site Street Address	1000 West Main Street			
6	Site City	Manchester	County	Meriwether	Zip
7	Property Owner	Manchester Development Authority			
8	Property Owner Mailing Address	P.O. Box 583			
9	Property Owner City	Manchester	State	Georgia	Zip
10	Property Owner Telephone No.	706-846-5341			
11	Site Contact Person	Not Applicable	Title		
12	Site Contact Company Name				
13	Site Contact Mailing Address				
14	Site Contact City		State		Zip
15	Site Contact Telephone No.				
16	Facility Operator Contact Person	Joan Caldwell	Title	Chairman	
17	Facility Operator Company Name	Manchester Development Authority			
18	Facility Operator Mailing Address	P.O. Box 538			
19	Facility Operator City	Manchester	State	Georgia	Zip
20	Facility Operator Telephone No.	706-846-5341			

**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.

Joan Caldwell <small>NAME (Please type or print)</small>	Chairman <small>TITLE</small>
<small>SIGNATURE</small>	December 3, 2013 <small>DATE</small>

## 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:**

The source of the release is unknown. It is presumed to have originated onsite, from the former manufacturing operations at the facility.

**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 was discovered during a Phase II ESA at the facility. The impacted media was soil and groundwater. Release dates and quantities are unknown.

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

No actions have been taken to address the release, outside the identification of the release during the Phase II ESA.

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

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

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

The subject property has a six foot chain link fence that surrounds the property (at least in the area where the release was detected). The gates remain locked, except when the property is being accessed by authorized personnel.

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

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

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

The area where the release was detected is entirely paved with asphalt. The shallowest soil sample, exhibiting contaminant concentrations above laboratory detect limits, was approximately 13.5 feet below the existing ground surface.

## 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: Pete Burns

Address: 999 A & B West Main 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: Charles E. Williams

Address: 451 Dorton Creek Road

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

Yes       No

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

### REQUIRED ATTACHMENTS

#### 9. SITE SUMMARY

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

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

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

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

### PART III -- SOIL RELEASE INFORMATION

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

Regulated Substance	CAS Registry Number	Highest Concentration Detected Between 0-6 Inches (Specify Units)	Highest Concentration Detected Between 6-24 Inches (Specify Units)	Highest Concentration Detected Greater Than 24 Inches (Specify Units)
1,1-Dichloroethane	75-34-3			0.0016 mg/kg
1,1-Dichloroethene	75-35-4			0.021 mg/kg
cis-1,2-Dichloroethene	156-59-2			0.0033 mg/kg
Tetrachloroethene	127-18-4			0.11 mg/kg
Trichloroethene	79-01-6			0.0051 mg/kg
Arsenic	7440-38-2		15 mg/kg	
Barium	7440-39-3		30 mg/kg	
Chromium	7440-47-3		49 mg/kg	
Lead	7439-92-1		11 mg/kg	
Mercury	7439-97-6		0.16 mg/kg	



# **ATTACHMENT 1**

## 9.A. SITE SUMMARY

The subject property (which is comprised of tax parcels MA02-002 and MA02-002-001) is located at 1000 West Main Street in Manchester, Muscogee County, Georgia. The property totals approximately 30 acres. A warehouse and former manufacturing facility is located on the subject property. The site structure(s) is approximately 370,000 square feet in size. Most of the rest of the site consists of paved parking, with some grass and tree covered areas. The portion of the site where the release was identified is entirely paved, and fenced in with a 6 foot chain link fence. Based on the results of a Phase I ESA performed at the site, a Phase II ESA was performed at the site to address multiple former RECs, all related to the site's former use as a manufacturing facility.

The area around the site is a mix of commercial, residential, religious and undeveloped properties. The site is bordered on the north by undeveloped wooded property. To the east, the site is bordered by an unnamed access road, across which is undeveloped wooded land. To the south, the site is bordered by West Main Street, across which are religious and residential properties. To the west, the site is bordered by wooded land, a water tower, and another vacant manufacturing/warehouse facility.

The release was identified during a Phase II ESA (the report of which is dated November 4, 2013) performed at the site, to address the concerns noted above. Utilizing a truck-mounted CME-55 drill rig, equipped with hollow stem augers, nine borings were installed into the subsurface at the subject site, with a temporary monitoring well emplaced into seven of the nine borings. Two additional hand-augered borings were installed through the floor, within the interior of the onsite structure. The boring/temporary monitoring well locations are illustrated on the Boring Location Plan included in Attachment 2.

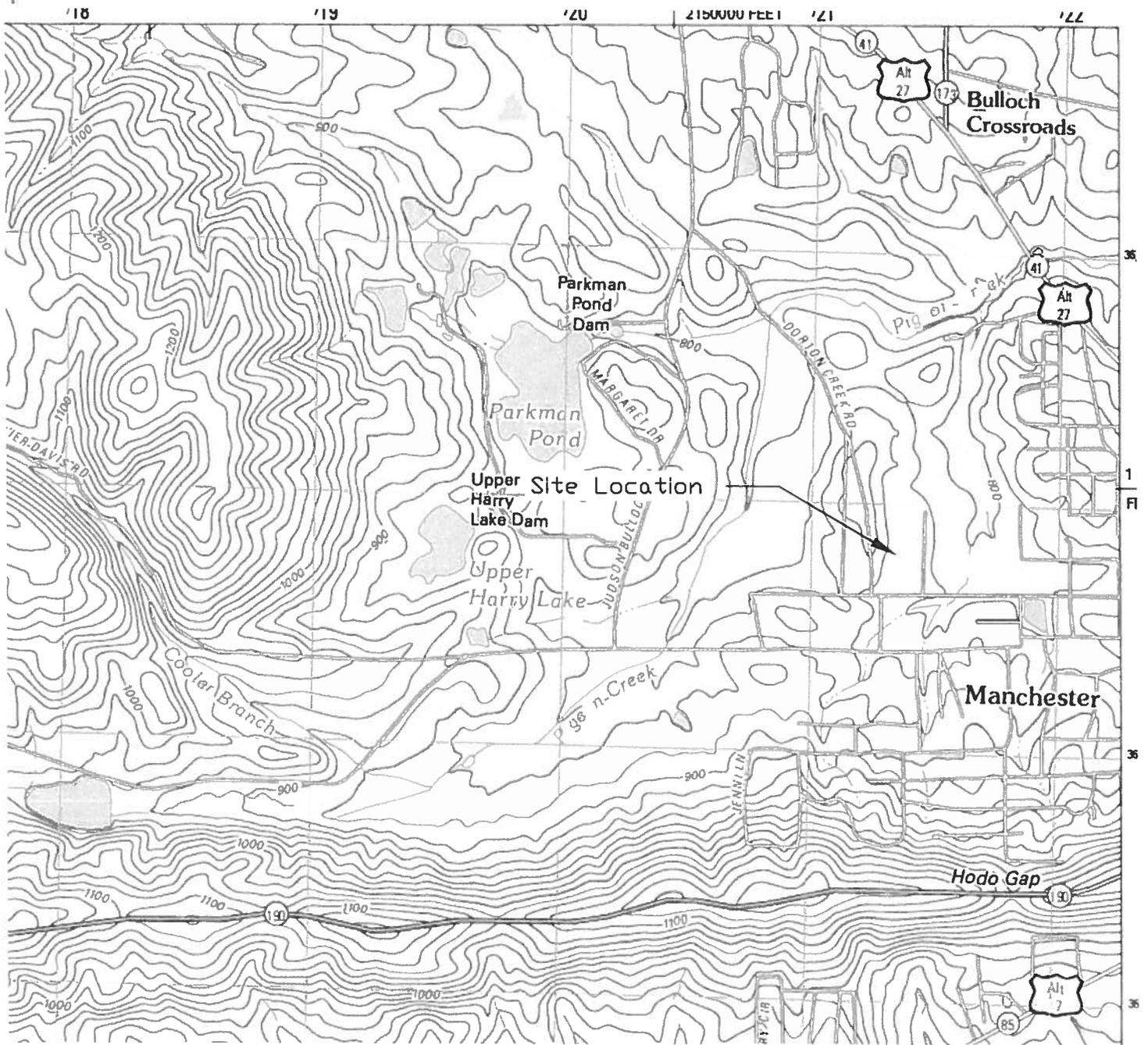
A total of five soil samples were retrieved from five of the borings (B-4, B-5, B-7, B-8 and B-9) for analysis for VOCs. One additional soil sample was collected from boring B-7, for analysis for RCRA Metals. Of the five soil samples collected and analyzed for VOCs, only one sample exhibited chemicals of concern (1,1-Dichloroethane, 1,1-Dichloroethene, cis-1,2-Dichloroethene, Tetrachloroethene and Trichloroethene) in concentrations exceeding the laboratory detection limits. None of the exhibited concentrations were, however, above the applicable soil release notification concentrations as found in the Georgia Rules for Hazardous Site Response. The single soil sample analyzed for RCRA Metals exhibited chemicals of concern (Arsenic, Barium, Chromium, Lead and Mercury) in concentrations exceeding the laboratory detection limits. None of the exhibited concentrations were, however, above the applicable soil release notification concentrations as found in the Georgia Rules for Hazardous Site Response.

A total of seven groundwater samples (one from each well) were retrieved from the temporary monitoring wells and submitted for laboratory analysis for VOCs. Copies of the analytical reports for the groundwater samples are included in Attachment 3. The results of the groundwater analyses did not indicate any chemicals of concern (COC) in concentrations exceeding the laboratory detection limits, except in the sample collected from boring B-9, which exhibited the following contaminants (with corresponding concentrations in parenthesis): 1,1-Dichloroethane (3.8 µg/L), 1,1-Dichloroethene (62 µg/L), cis-1,2-Dichloroethene (9.8 µg/L), Tetrachloroethene (380 µg/L) and Trichloroethene (19 µg/L).

It is anticipated that the release originated from the former onsite activities when the facility was operated by Goodys. The property has not been used for any manufacturing or other purposes since the Goodys plant was shut down.

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

## **ATTACHMENT 2**



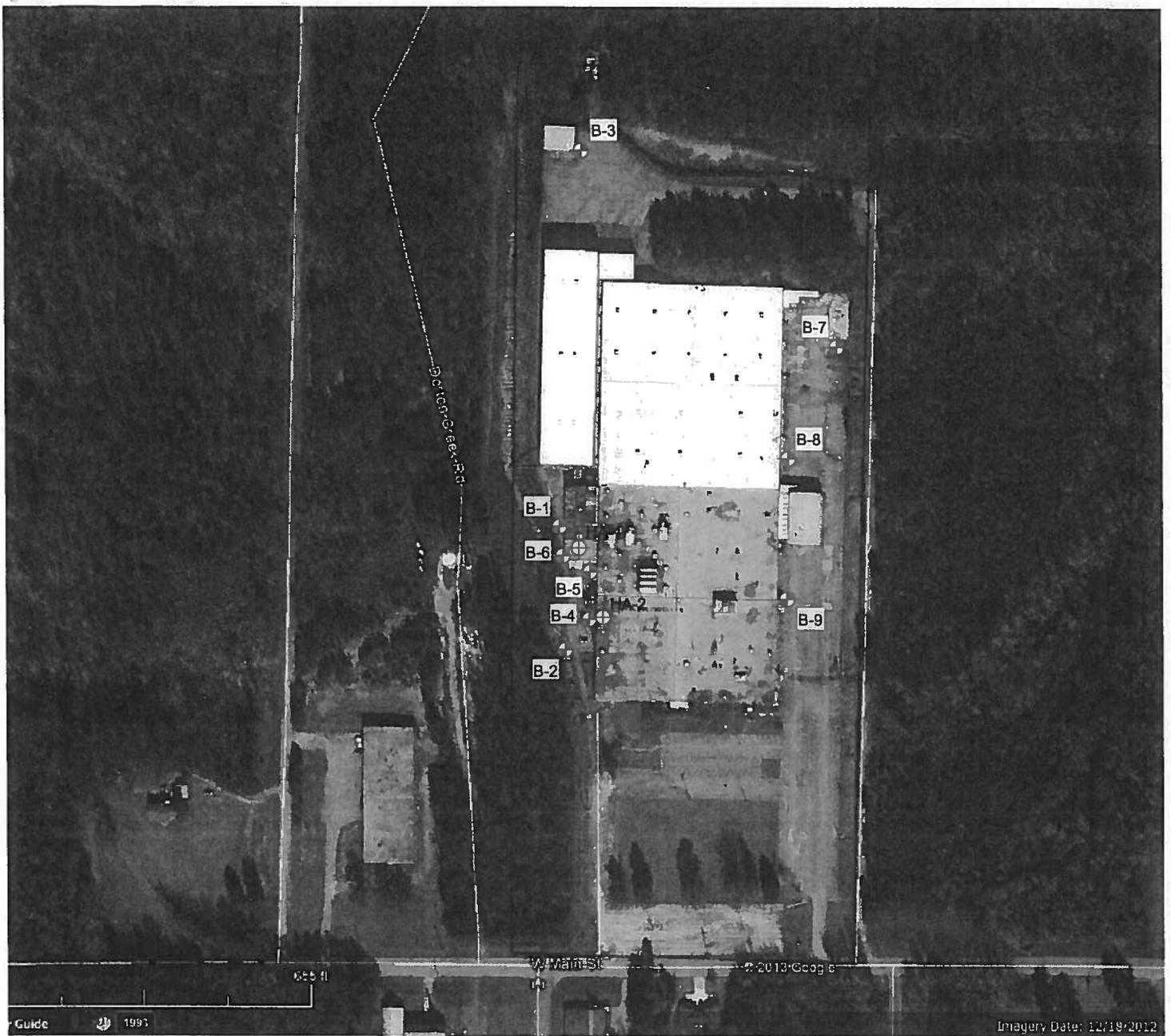
APPROXIMATE SCALE: 1" = 2,000'



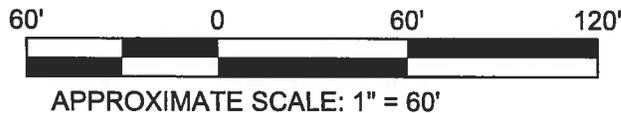
**FIGURE 1**  
 SITE LOCATION/TOPOGRAPHIC MAP  
 FORMER GOODYS PLANT  
 1000 W. MAIN STREET  
 MANCHESTER, GEORGIA  
 GEC PROJECT NO.: 130601.341

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

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



- B-1  = Approximate Location of Boring/Well
- HA-1  = Approximate Location of Hand-augered Boring



**FIGURE 2**  
**SITE/BORING LOCATION PLAN**  
**FORMER GOODY'S PLANT**  
**1000 W. MAIN STREET**  
**MANCHESTER, GEORGIA**  
**GEC PROJECT NO.: 130601.341**

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

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

6158

# RELEASE NOTIFICATION/REPORTING FORM

Georgia EPD



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

DEC 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)	Not Applicable			
3	Tax Map and Parcel ID Number:	6267 031	Acreeage	10.33	
4	Site or Facility Name	Suzanna's Kitchen, Inc.			
5	Site Street Address	4101 Blue Ridge Industrial Parkway			
6	Site City	Duluth	County	Gwinnett	Zip 30096
7	Property Owner	Suzanna's Kitchen, Inc.			
8	Property Owner Mailing Address	4025 Buford Hwy			
9	Property Owner City	Duluth	State	GA	Zip 30096
10	Property Owner Telephone No.	770 476 9900			
11	Site Contact Person	Brad Howard	Title	Chief Operating Officer	
12	Site Contact Company Name	same as above			
13	Site Contact Mailing Address	same as above			
14	Site Contact City		State		Zip
15	Site Contact Telephone No.	770 476 9900			
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.

Brad Howard C.O.O.  
 NAME (Please type or print) TITLE

[Signature] 12-8-2013  
 SIGNATURE DATE

## PART II -- RELEASE INFORMATION

Page 2 of 3

**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 - No use of arsenic has taken place on site. Believed to have been brought in as fill material prior to purchase 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.):**

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).**

Eight direct push borings installed at subject site at property line as discussed with EPD

**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.**

Approximately 95 percent of the property is covered with the manufacturing building and asphalt parking lot.

## PART II -- RELEASE INFORMATION

(Continued)

Page 3 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: Greater Atlanta Montessori School

Address: 3351 N. Berkeley Lake Road, Duluth

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

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

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

Name: Unknown

Address: Unknown

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

Yes       No

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

## REQUIRED ATTACHMENTS

### 9. SITE SUMMARY

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

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

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

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



**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)

**SITE SUMMARY**  
**SUZANNA'S KITCHEN, INC.**  
**4101 BLUE RIDGE INDUSTRIAL PARKWAY, DULUTH, GA**

The Facility is located at 4101 Blue Ridge industrial Parkway in Duluth, (Gwinnett County) Georgia. The Facility is located in the Piedmont Physiographic District. Elevations on the site range approximately from 1082 feet above mean sea level (AMSL) at the southeast side of the Facility to approximately 1070 feet AMSL at the northwest side of the Facility. The Facility is situated on 10.33 acres. An unnamed tributary that drains to Berkeley Lake is located approximately 500 feet east of the facility and another un-named tributary that drains to Northwoods Lake is approximately 800 feet west of the Facility. Both of these lakes subsequently drain to the Chattahoochee River.

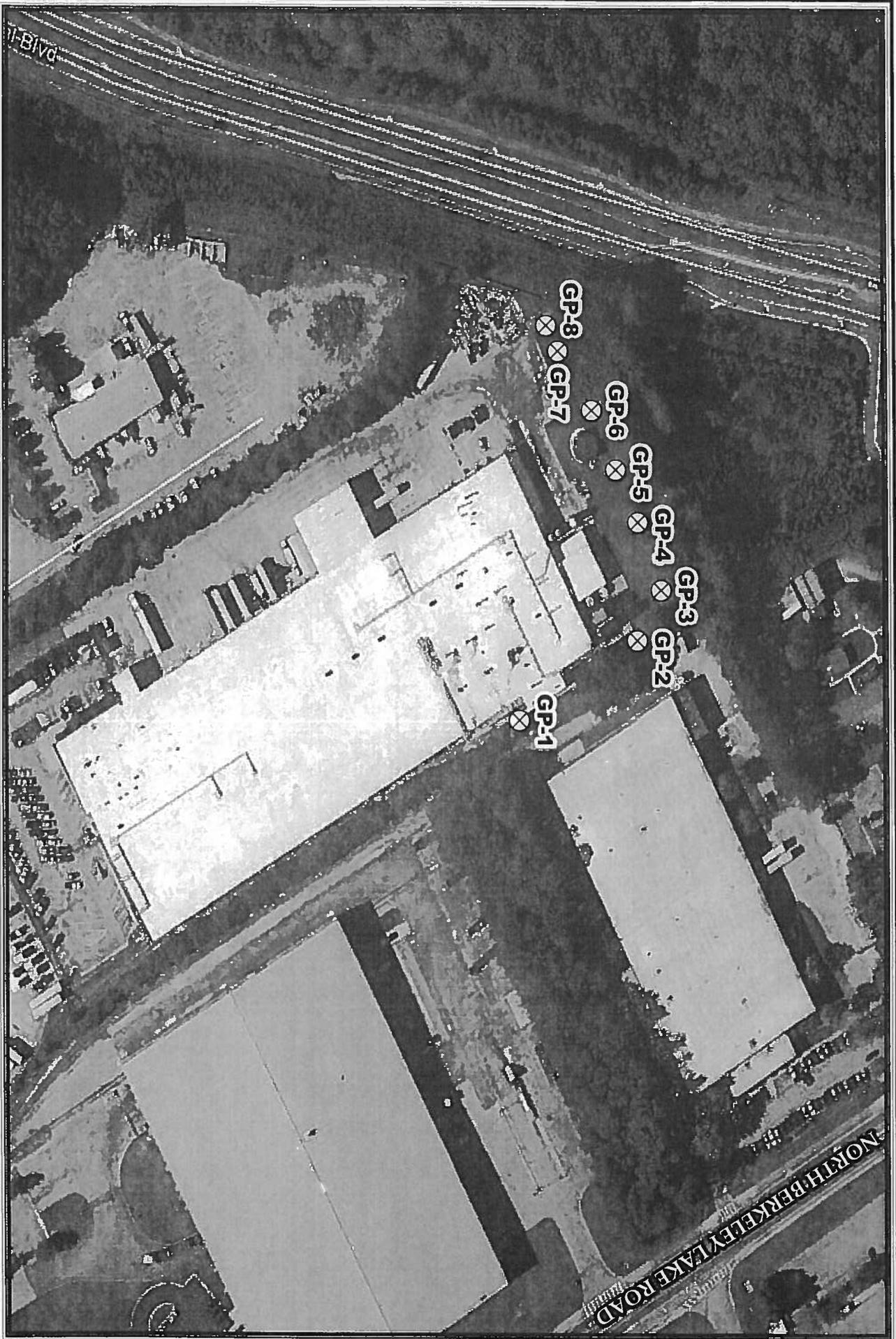
Suzanna's Kitchen, Inc. manufactures assorted food related products. The Facility manufacturing areas at this location consists of one 166,600 sq. ft. building that includes food product cooking and packaging operations.

A subsurface soils investigation was completed by Environmental Management Associates, LLC (EMA) in accordance with EPD's correspondence dated October 28, 2013 and subsequent conversations with Mr. Kevin Collins at EPD. Eight borings (GP-1 thru GP-8) were installed on November 25, 2013 with a Geoprobe along two sides of the property as illustrated on Figure 1. Soil samples were collected from each of the borings at the 1 to 2 ft. and 4 to 5 ft. intervals and submitted to the project laboratory for total arsenic, lead, and cadmium as agreed upon with EPD.

Seven of the eight borings and 11 of the 16 soil samples contained arsenic with levels above the associated Notification Concentration (NC) of 41 milligrams per kilogram (mg/kg). Arsenic concentrations in the surface soil samples ranged from below the reporting limit (BRL) to 118 mg/kg. Subsurface soil concentrations of arsenic ranged from 47 mg/kg to 373 mg/kg. Lead and cadmium was not reported in any soil sample above the associated NC's for these analytes. A soil data summary is provided in the attached Table 1. A copy of the analytical laboratory report is also attached.

The site and surrounding properties are served by a public water supply system. A public and private well search was completed for the adjacent Gwinnett County Regional Distribution Center Site (HSI No. 10844) and the Gwinnet County Fire Station No. 19 property within a three-mile radius. No wells were identified in these searches.

The closest residence, playground, day care, school or nursing home is the Greater Atlanta Montessori School located at 3351 N. Berkeley Lake Rd which is approximately 700 feet to the northwest.



Legend  
 ⊗ GEOPROBE



Client: SUZANNA'S KITCHEN  
 4001 Pine Ridge Road, Berkeley, CA 94705  
 Facility ID: \_\_\_\_\_


**EMA**  
 Environmental Management Associates, LLC  
 Figure 1

**SITE PLAN**

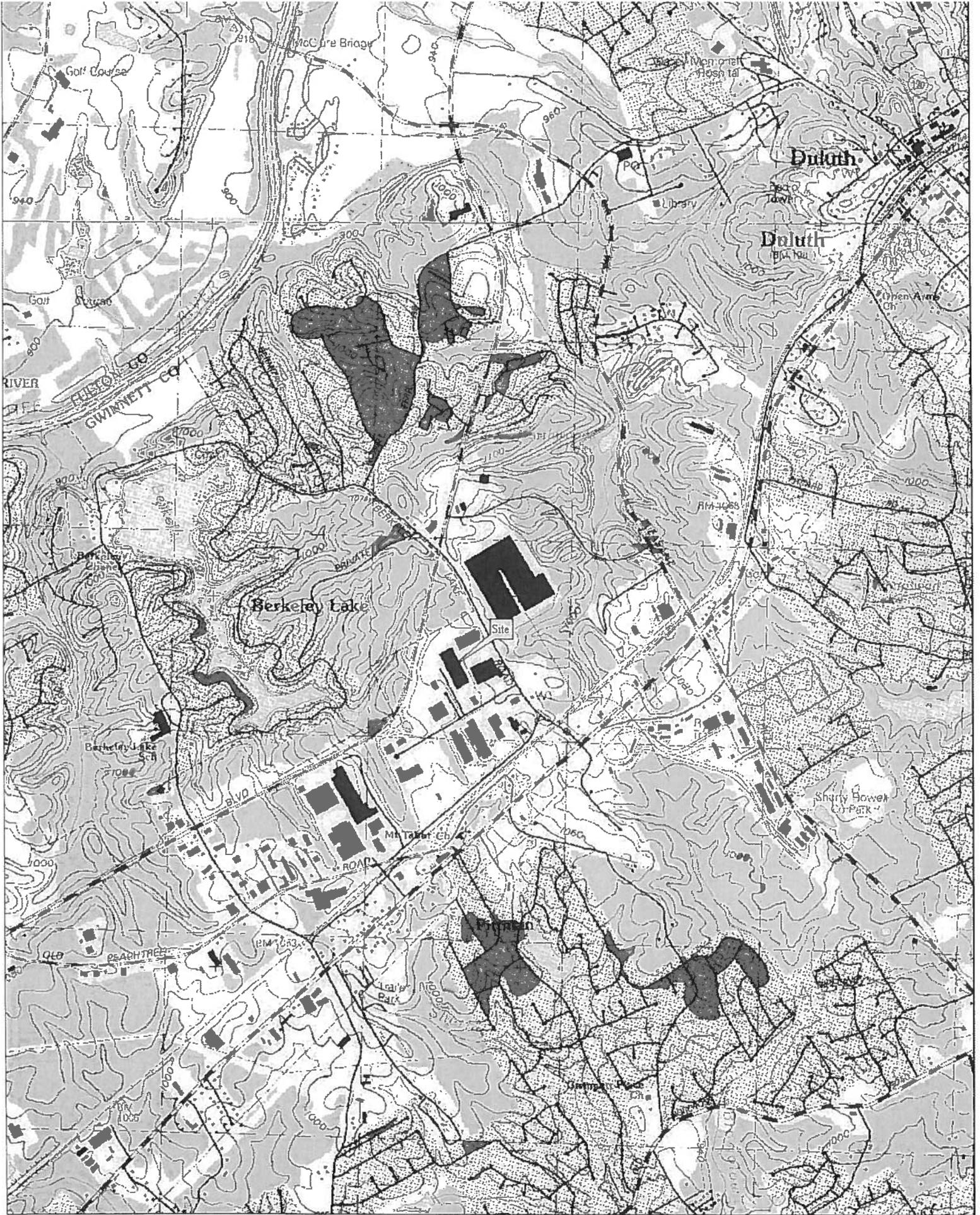
TABLE 1  
ANALYTICAL SOIL DATA  
SUZANNAS KITCHEN  
DULUTH, GEORGIA

Sample Location	Date	Depth (feet bgs) <sup>(1)</sup>	Arsenic (mg/kg)	Lead (mg/kg)	Cadmium (mg/kg)
GP-01	11/25/2013	1-2	17	44.1	BRL
	11/25/2013	4-5	47	16.7	BRL
GP-2	11/25/2013	1-2	BRL	12.2	BRL
	11/25/2013	4-5	134	46.9	BRL
GP-3	11/25/2013	1-2	99.2	32.5	BRL
	11/25/2013	4-5	373	63.3	BRL
GP-4	11/25/2013	1-2	19.6	21.1	BRL
	11/25/2013	4-5	99.9	6.87	BRL
GP-5	11/25/2013	1-2	107	34.5	BRL
	11/25/2013	4-5	108	23	BRL
GP-6	11/25/2013	1-2	25.1	19.2	BRL
	11/25/2013	4-5	138	26.3	BRL
GP-7	11/25/2013	1-2	66.7	21.5	BRL
	11/25/2013	4-5	133	25.5	BRL
GP-8	11/25/2013	1-2	118	30.8	BRL
	11/25/2013	4-5	149	73.1	BRL
Notification Concentration <sup>(3)</sup>		--	41	400	39
Type 4 RRS <sup>(4)</sup>		--	38 (surf.)/130 (subs.)	400	77

## Notes:

- 1) bgs - below ground surface
- 2) mg/kg - milligrams per kilogram
- 3) HSRA Notification Concentrations
- 4) EPD Type 4 Risk Reduction Standards





6155

# 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  
 DEC 12 2013  
 Response and Remediation Program

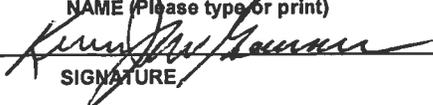
1. The information provided in this form is for:  
 Initial Release Notification  
 Supplemental Notification

## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	Not Applicable			
3	Tax Map and Parcel ID Number:	6267 050	Acreage	4.72	
4	Site or Facility Name	Diamond Crystal Brands			
5	Site Street Address	3245 North Berkeley Lake Road			
6	Site City	Duluth	County	Gwinnett	Zip 30096
7	Property Owner	Diamond Crystal Brands			
8	Property Owner Mailing Address	3245 North Berkeley Lake Road			
9	Property Owner City	Duluth	State	GA	Zip 30096
10	Property Owner Telephone No.	800 788 8026			
11	Site Contact Person	Michael Putnam	Title	Plant Manager	
12	Site Contact Company Name	same as above			
13	Site Contact Mailing Address	same as above			
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	same as property owner			
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.

Kevin McGowan Director of Operations  
 NAME (Please type or print) TITLE  
 12/11/13  
 SIGNATURE 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 or known source of the release, including the source of this information:**

*Based on a review of the chemicals stored and the nature of the process, no use or storage of arsenic has taken place on the property. The source of the arsenic is unknown.*

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

*During a recent conversation between EMA representative, Mr. Brent Cortelloni, and EPD representative, Mr. Kevin Collins, Mr. Collins stated the arsenic containing material was brought in as fill material in the 1960's.*

**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).**

*Eight direct push borings were completed at subject site's property line as discussed with Mr. Collins prior to investigation. Boring locations are noted on Figure 1 – Site Plan.*

**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.**

*Approximately 70 percent of the property is covered with the manufacturing building and asphalt parking lot.*

## 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: Greater Atlanta Montessori School

Address: 3351 N. Berkeley Lake Road, Duluth

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: No wells were identified in a 3 mile radius based on surveys completed for adjacent properties

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://gqsstore.dnr.state.ga.us>.





**SITE SUMMARY**  
**DIAMOND CRYSTAL BRANDS - DULUTH**  
**3245 N. BERKELEY LAKE RD, DULUTH, GA**

The Facility is located at 3245 N. Berkeley Lake Rd, N.W., Duluth, (Gwinnett County) Georgia. The Facility is located in the Piedmont Physiographic District. Elevations on the site range approximately from 1090 feet above mean sea level (AMSL) at the southeast side of the Facility to approximately 1077 feet AMSL at the northwest side of the Facility. The Facility is situated on 4.72 acres. An unnamed tributary that drains to Berkeley Lake is located approximately 200 feet east of the facility and another unnamed tributary that drains to Northwoods Lake is 500 feet west of the Facility. Both of these lakes subsequently drain to the Chattahoochee River.

Diamond Crystal Brands manufactures liquid, portion-control packaged condiments, dressings, sauces, and assorted food related products. The Facility manufacturing areas consist of one 83,260 sq. ft. building that includes food product mix and packaging operations. At no time has arsenic or arsenic related compounds been manufactured, stored, or used on the property.

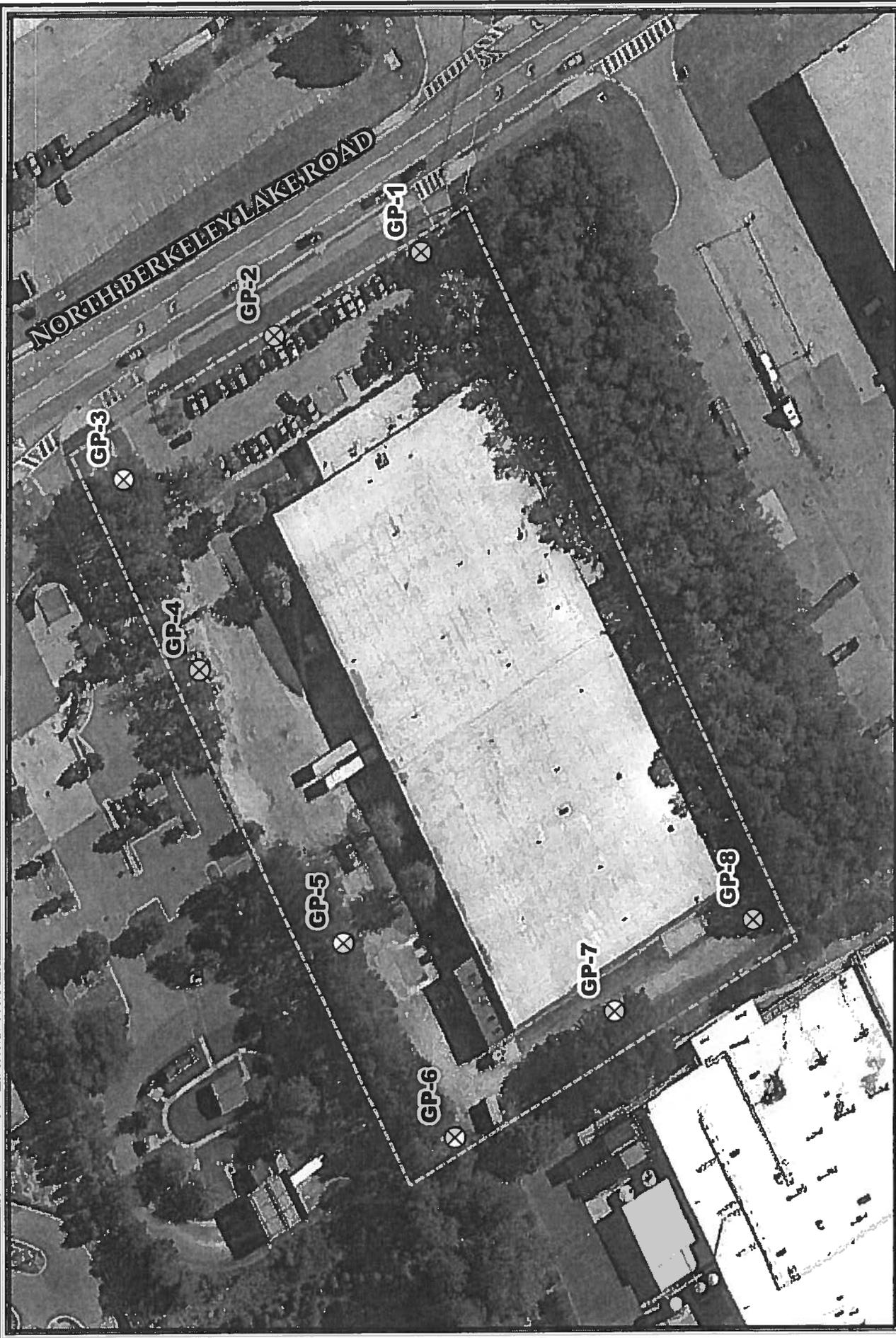
A subsurface soils investigation was completed by Environmental Management Associates, LLC (EMA) in accordance with EPD's correspondence dated October 28, 2013 and subsequent conversations with Mr. Kevin Collins at EPD. Eight direct push borings (GP-1 thru GP-8) were completed on November 18, 2013 with a Geoprobe along three sides of the property as illustrated on Figure 1. Soil samples were collected from each of the borings at the 1 to 2 ft. and 4 to 5 ft. intervals and submitted to the project laboratory for arsenic, lead, and cadmium as agreed upon with Mr. Kevin Collins. The analytical method used for testing was SW-846 method 6010C.

Six of the eight borings and 11 of the 16 soil samples contained arsenic with levels above the associated Notification Concentration (NC) of 41 milligrams per kilogram (mg/kg). Arsenic concentrations in the surface soil samples (1 to 2 ft interval) ranged from 12.3 mg/kg to 221 mg/kg. Subsurface soil concentrations (4 to 5 ft interval) of arsenic ranged from 8.45 mg/kg to 271 mg/kg. Lead and cadmium was not reported in any soil sample above the associated NC's for these analytes. A soil data summary is provided in the attached Table 1. A copy of the analytical laboratory report is also attached.

The site and surrounding properties are served by a public water supply system. A public and private well search was completed for the adjacent Gwinnett County Regional Distribution Center Site (HSI No. 10844) and the Gwinnet County Fire Station No. 19 property within a three-mile radius. No wells were identified in these searches.

The closest residence, playground, day care, school or nursing home is the Greater Atlanta Montessori School located at 3351 N. Berkeley Lake Rd which is approximately 390 feet to the northwest.

Borings were completed on the northeast, northwest, and southwest sides of the property. Analytical results of these samples contained levels of arsenic above the NC. No cleanup actions have been conducted to date.



N

Legend

 GEOPROBE BORING  
 BOUNDARY

0 20 40 80 120 160 Feet

**SITE PLAN**  
 Client: Diamond Crystal Brands - Duluth  
 305 North Berkeley Lake Road  
 Duluth, GA 30135  
 Facility ID:  

Figure **1**  
 Environmental Management Associates, LLC

TABLE 1  
ANALYTICAL SOIL DATA SUMMARY  
DIAMOND CRYSTAL BRANDS  
DULUTH, GEORGIA

Sample Location	Date	Depth (feet bgs) <sup>(1)</sup>	Arsenic (mg/kg) <sup>(2)</sup>	Lead (mg/kg)	Cadmium (mg/kg)
GP-01	11/18/2013	1-2	75.1	20.9	BRL
	11/18/2013	4-5	24.4	BRL	BRL
GP-2	11/18/2013	1-2	221	31.4	BRL
	11/18/2013	4-5	271	9.98	BRL
GP-3	11/18/2013	1-2	32.6	39.4	BRL
	11/18/2013	4-5	8.45	65	BRL
GP-4	11/18/2013	1-2	44.6	13.4	BRL
	11/18/2013	4-5	54.8	19.3	BRL
GP-5	11/18/2013	1-2	122	56.9	BRL
	11/18/2013	4-5	73.6	57.3	BRL
GP-6	11/18/2013	1-2	158	45.3	BRL
	11/18/2013	4-5	49.8	47.7	BRL
GP-7	11/18/2013	1-2	118	29	BRL
	11/18/2013	4-5	113	28.4	BRL
GP-8	11/18/2013	1-2	12.3	15.8	BRL
	11/18/2013	4-5	28.9	11.7	BRL
Notification Concentration <sup>(3)</sup>		--	41	400	39
Type 4 RRS <sup>(4)</sup>		--	38 (surf.)/130 (subs.)	400	77

## Notes:

Analytical method used for testing was SW-846 Method 6010C.

- 1) bgs - below ground surface
- 2) mg/kg - milligrams per kilogram
- 3) HSRA Notification Concentrations
- 4) EPD Type 4 Risk Reduction Standards



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

November 27, 2013

Brent Cortelloni  
Environmental Management Associates, LLC  
5262 Belle Wood Court  
Buford Georgia 30518

TEL: (770) 271-4628  
FAX: (770) 271-8944

RE: DCB

Dear Brent Cortelloni:

Order No: 1311E89

Analytical Environmental Services, Inc. received 16 samples on 11/19/2013 10:45:00 AM for the analyses presented in following report.

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

AES' certifications are as follows:

- NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/13-06/30/14.
- AIHA-LAP, LLC Laboratory ID: 100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/15.

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

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

Mirzeta Kararic  
Project Manager





# ANALYTICAL ENVIRONMENTAL SERVICES, INC

3785 Presidential Parkway, Atlanta GA 30340-3704

AES TEL.: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

## CHAIN OF CUSTODY

Work Order: 1311E89

Date: \_\_\_\_\_ Page 2 of 2

COMPANY: <b>EMA/BC</b>		ADDRESS:					ANALYSIS REQUESTED						Visit our website <a href="http://www.aesatlanta.com">www.aesatlanta.com</a> to check on the status of your results, place bottle orders, etc.	No # of Containers
PHONE:		FAX:					Arsenic Lead Cadmium							
SAMPLED BY: <i>B. Clarke</i>		SIGNATURE: <i>[Signature]</i>					PRESERVATION (See codes)						REMARKS	
#	SAMPLE ID	SAMPLED		Grab	Composite	Matrix (See codes)								
		DATE	TIME											
1	GP8-1-2	11-18-13		Y		S	Y	Y	Y					
2	GP8-4-5	L	10:00	Y		S	Y	Y	Y					
3														
4														
5														
6														
7														
8														
9														
10														
11														
12														
13														
14														

RELINQUISHED BY: <i>[Signature]</i>	DATE/TIME: 11-17-13/10:45	RECEIVED BY: <i>[Signature]</i>	DATE/TIME: 11/19/13 10:45	PROJECT NAME: DCB	RECEIPT
2:		1:		PROJECT #: 585	Total # of Containers
3:		3:		SITE ADDRESS:	<input checked="" type="checkbox"/> Turnaround Time Request <input type="checkbox"/> Standard 5 Business Days <input type="checkbox"/> 2 Business Day Rush <input type="checkbox"/> Next Business Day Rush <input type="checkbox"/> Same Day Rush (auth req.) <input type="checkbox"/> Other _____
SPECIAL INSTRUCTIONS/COMMENTS: Page 3 of 3	SHIPMENT METHOD		SEND REPORT TO:		STATE PROGRAM (if any): _____
	OUT	VIA:	INVOICE TO:		E-mail? Y/N; Fax? Y/N
	IN	VIA:	(IF DIFFERENT FROM ABOVE)		DATA PACKAGE: I II III IV
	CLIENT	FedEx UPS MAIL COURIER	QUOTE #:		
	GREYHOUND	OTHER	PO#:		

SAMPLES RECEIVED AFTER 3PM OR ON SATURDAY ARE CONSIDERED RECEIVED THE NEXT BUSINESS DAY. IF TURNAROUND TIME IS NOT INDICATED, AES WILL PROCEED WITH STANDARD TAT OF SAMPLES. SAMPLES ARE DISPOSED 30 DAYS AFTER REPORT COMPLETION UNLESS OTHER ARRANGEMENTS ARE MADE:

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water  
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original; Yellow Copy - Client





Analytical Environmental Services, Inc

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP2-1-2
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-003	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>								
					(SW3050B)			
Arsenic	221	5.90		mg/Kg-dry	183991	1	11/22/2013 19:46	JL
Cadmium	BRL	2.95		mg/Kg-dry	183991	1	11/22/2013 19:46	JL
Lead	31.4	5.90		mg/Kg-dry	183991	1	11/22/2013 19:46	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	19.6	0		wt%	R256550	1	11/25/2013 11:30	EH

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

Analytical Environmental Services, Inc

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP2-4-5
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-004	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>								
					(SW3050B)			
Arsenic	271	5.64		mg/Kg-dry	183991	1	11/22/2013 19:51	JL
Cadmium	BRL	2.82		mg/Kg-dry	183991	1	11/22/2013 19:51	JL
Lead	9.98	5.64		mg/Kg-dry	183991	1	11/22/2013 19:51	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	19.0	0		w1%	R256550	1	11/25/2013 11:30	EH

**Qualifiers:**

- \* Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP3-1-2
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-005	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>								
					(SW3050B)			
Arsenic	32.6	5.14		mg/Kg-dry	183991	1	11/22/2013 19:05	JL
Cadmium	BRL	2.57		mg/Kg-dry	183991	1	11/22/2013 19:05	JL
Lead	39.4	5.14		mg/Kg-dry	183991	1	11/22/2013 19:05	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	5.28	0		wt%	R256550	1	11/25/2013 11:30	EH

**Qualifiers:**

- \* Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

**Analytical Environmental Services, Inc**

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP3-4-5
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-006	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>					<b>(SW3050B)</b>			
Arsenic	8.45	4.94		mg/Kg-dry	183991	1	11/22/2013 19:56	JL
Cadmium	BRL	2.47		mg/Kg-dry	183991	1	11/22/2013 19:56	JL
Lead	65.0	4.94		mg/Kg-dry	183991	1	11/22/2013 19:56	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	3.08	0		wt%	R256550	1	11/25/2013 11:30	EH

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

**Analytical Environmental Services, Inc**

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP4-1-2
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-007	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>								
					(SW3050B)			
Arsenic	44.6	5.25		mg/Kg-dry	183991	1	11/22/2013 20:00	JL
Cadmium	BRL	2.62		mg/Kg-dry	183991	1	11/22/2013 20:00	JL
Lead	13.4	5.25		mg/Kg-dry	183991	1	11/22/2013 20:00	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	8.25	0		wt%	R256550	1	11/25/2013 11:30	EH

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

**Analytical Environmental Services, Inc**

**Date:** 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP4-4-5
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-008	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>					<b>(SW3050B)</b>			
Arsenic	54.8	5.14		mg/Kg-dry	183991	1	11/22/2013 20:04	JL
Cadmium	BRL	2.57		mg/Kg-dry	183991	1	11/22/2013 20:04	JL
Lead	19.3	5.14		mg/Kg-dry	183991	1	11/22/2013 20:04	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	6.53	0		wt%	R256550	1	11/25/2013 11:30	EH

**Qualifiers:**

- \* Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP5-1-2
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-009	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>					<b>(SW3050B)</b>			
Arsenic	122	5.93		mg/Kg-dry	183991	1	11/22/2013 20:08	JL
Cadmium	BRL	2.97		mg/Kg-dry	183991	1	11/22/2013 20:08	JL
Lead	56.9	5.93		mg/Kg-dry	183991	1	11/22/2013 20:08	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	18.9	0		wt%	R256550	1	11/25/2013 11:30	EH

Qualifiers:

- \* Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

**Analytical Environmental Services, Inc**

**Date:** 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP5-4-5
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-010	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>								
					(SW3050B)			
Arsenic	73.6	5.93		mg/Kg-dry	183991	1	11/22/2013 20:19	JL
Cadmium	BRL	2.96		mg/Kg-dry	183991	1	11/22/2013 20:19	JL
Lead	57.3	5.93		mg/Kg-dry	183991	1	11/22/2013 20:19	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	18.6	0		wt%	R256550	1	11/25/2013 11:30	EH

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

**Analytical Environmental Services, Inc**

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP6-1-2
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-011	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>					<b>(SW3050B)</b>			
Arsenic	158	5.56		mg/Kg-dry	183991	1	11/22/2013 20:23	JL
Cadmium	BRL	2.78		mg/Kg-dry	183991	1	11/22/2013 20:23	JL
Lead	45.3	5.56		mg/Kg-dry	183991	1	11/22/2013 20:23	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	13.5	0		wt%	R256550	1	11/25/2013 11:30	EH

**Qualifiers:**

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

Analytical Environmental Services, Inc

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP6-4-5
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-012	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>					<b>(SW3050B)</b>			
Arsenic	49.8	5.70		mg/Kg-dry	183991	1	11/22/2013 20:27	JL
Cadmium	BRL	2.85		mg/Kg-dry	183991	1	11/22/2013 20:27	JL
Lead	47.7	5.70		mg/Kg-dry	183991	1	11/22/2013 20:27	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	14.2	0		wt%	R256550	1	11/25/2013 11:30	EH

Qualifiers:

- \* Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

**Analytical Environmental Services, Inc**

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP7-1-2
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-013	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>					<b>(SW3050B)</b>			
Arsenic	118	5.40		mg/Kg-dry	183991	1	11/22/2013 20:32	JL
Cadmium	BRL	2.70		mg/Kg-dry	183991	1	11/22/2013 20:32	JL
Lead	29.0	5.40		mg/Kg-dry	183991	1	11/22/2013 20:32	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	8.41	0		wt%	R256550	1	11/25/2013 11:30	EH

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

Analytical Environmental Services, Inc

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP7-4-5
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-014	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>								
					(SW3050B)			
Arsenic	113	5.58		mg/Kg-dry	183991	1	11/22/2013 20:36	JL
Cadmium	BRL	2.79		mg/Kg-dry	183991	1	11/22/2013 20:36	JL
Lead	28.4	5.58		mg/Kg-dry	183991	1	11/22/2013 20:36	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	13.0	0		wt%	R256550	1	11/25/2013 11:30	EH

**Qualifiers:**

- Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value

- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP8-1-2
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 8:00:00 AM
<b>Lab ID:</b> 1311E89-015	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>								
					(SW3050B)			
Arsenic	12.3	5.69		mg/Kg-dry	183991	1	11/22/2013 20:40	JL
Cadmium	BRL	2.84		mg/Kg-dry	183991	1	11/22/2013 20:40	JL
Lead	15.8	5.69		mg/Kg-dry	183991	1	11/22/2013 20:40	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	13.9	0		wt%	R256550	1	11/25/2013 11:30	EH

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

Analytical Environmental Services, Inc

Date: 27-Nov-13

<b>Client:</b> Environmental Management Associates, LLC	<b>Client Sample ID:</b> GP8-4-5
<b>Project Name:</b> DCB	<b>Collection Date:</b> 11/18/2013 10:50:00 AM
<b>Lab ID:</b> 1311E89-016	<b>Matrix:</b> Soil

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
<b>METALS, TOTAL SW6010C</b>					<b>(SW3050B)</b>			
Arsenic	28.9	5.69		mg/Kg-dry	183991	1	11/22/2013 20:44	JL
Cadmium	BRL	2.84		mg/Kg-dry	183991	1	11/22/2013 20:44	JL
Lead	11.7	5.69		mg/Kg-dry	183991	1	11/22/2013 20:44	JL
<b>PERCENT MOISTURE D2216</b>								
Percent Moisture	13.4	0		wt%	R256550	1	11/25/2013 11:30	EH

Qualifiers:

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

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client EMA/BL

Work Order Number 1311E09

Checklist completed by [Signature] Date 11/19/13

Carrier name: FedEx  UPS  Courier  Client  US Mail  Other

Shipping container/cooler in good condition? Yes  No  Not Present   
Custody seals intact on shipping container/cooler? Yes  No  Not Present   
Custody seals intact on sample bottles? Yes  No  Not Present   
Container/Temp Blank temperature in compliance? (4°C±2)\* Yes  No

Cooler #1 31 Cooler #2 \_\_\_\_\_ Cooler #3 \_\_\_\_\_ Cooler #4 \_\_\_\_\_ Cooler#5 \_\_\_\_\_ Cooler #6 \_\_\_\_\_

Chain of custody present? Yes  No   
Chain of custody signed when relinquished and received? Yes  No   
Chain of custody agrees with sample labels? Yes  No   
Samples in proper container/bottle? Yes  No   
Sample containers intact? Yes  No   
Sufficient sample volume for indicated test? Yes  No   
All samples received within holding time? Yes  No   
Was TAT marked on the COC? Yes  No   
Proceed with Standard TAT as per project history? Yes  No  Not Applicable   
Water - VOA vials have zero headspace? No VOA vials submitted  Yes  No   
Water - pH acceptable upon receipt? Yes  No  Not Applicable

Adjusted? \_\_\_\_\_ Checked by \_\_\_\_\_  
Sample Condition: Good  Other(Explain) \_\_\_\_\_  
(For diffusive samples or AIHA lead) Is a known blank included? Yes  No

See Case Narrative for resolution of the Non-Conformance.

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

Client: Environmental Management Associates, LLC  
 Project Name: DCB  
 Workorder: 1311E89

**ANALYTICAL QC SUMMARY REPORT**

BatchID: 183991

Sample ID: MB-183991	Client ID:	Units: mg/Kg	Prep Date: 11/21/2013	Run No: 256486							
SampleType: MBLK	TestCode: METALS, TOTAL SW6010C	BatchID: 183991	Analysis Date: 11/22/2013	Seq No: 5389783							
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic	BRL	5.00									
Cadmium	BRL	2.50									
Lead	BRL	5.00									

Sample ID: LCS-183991	Client ID:	Units: mg/Kg	Prep Date: 11/21/2013	Run No: 256486							
SampleType: LCS	TestCode: METALS, TOTAL SW6010C	BatchID: 183991	Analysis Date: 11/22/2013	Seq No: 5389781							
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic	48.40	5.00	50.00		96.8	80	120				
Cadmium	48.06	2.50	50.00		96.1	80	120				
Lead	48.48	5.00	50.00	0.1402	96.7	80	120				

Sample ID: 1311E89-005AMS	Client ID: GP3-1-2	Units: mg/Kg-dry	Prep Date: 11/21/2013	Run No: 256486							
SampleType: MS	TestCode: METALS, TOTAL SW6010C	BatchID: 183991	Analysis Date: 11/22/2013	Seq No: 5389789							
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic	71.90	5.17	51.73	32.60	76.0	75	125				
Cadmium	46.89	2.59	51.73	0.1928	90.3	75	125				
Lead	91.64	5.17	51.73	39.36	101	75	125				

Sample ID: 1311E89-005AMSD	Client ID: GP3-1-2	Units: mg/Kg-dry	Prep Date: 11/21/2013	Run No: 256486							
SampleType: MSD	TestCode: METALS, TOTAL SW6010C	BatchID: 183991	Analysis Date: 11/22/2013	Seq No: 5389792							
Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual

Arsenic	66.65	5.14	51.35	32.60	66.3	75	125	71.90	7.58	20	S
Cadmium	46.31	2.57	51.35	0.1928	89.8	75	125	46.89	1.26	20	
Lead	92.92	5.14	51.35	39.36	104	75	125	91.64	1.38	20	

Qualifiers:	> Greater than Result value	< Less than Result value	B Analyte detected in the associated method blank
	BRL Below reporting limit	E Estimated (value above quantitation range)	H Holding times for preparation or analysis exceeded
	J Estimated value detected below Reporting Limit	N Analyte not NELAC certified	R RPD outside limits due to matrix
	Rpt Lim Reporting Limit	S Spike Recovery outside limits due to matrix	



**COPY**

December 18, 2013

Gerald L. Pouncey, Jr.  
404-504-7738  
glp@mmmlaw.com  
www.mmmlaw.com

**VIA HAND DELIVERY**

Mr. Derrick Williams  
Georgia Response and Remediation Program  
2 Martin Luther King Jr., Drive, Suite 1054  
Atlanta, GA 30334

RE: Release Notification; Town Square Shopping Center  
3939-3987 Lawrenceville Highway, Tucker, Dekalb County

Dear Mr. Williams:

On behalf of our client, Tucker Town Square, LLC, enclosed please find a release notification package for the Town Square Shopping Center. Our client recently purchased the subject property on November 22, 2013.

As part of pre-purchase due diligence activities, Phase II sampling was performed on the subject property to investigate potential groundwater impact from an off-site source. Groundwater contamination was identified and is the subject of the release notification package.

Based upon the Reportable Quantities Screening Method and the results of the water well survey, we believe a No Listing letter is warranted for the subject property. The property is also being entered into the Georgia Brownfield Program simultaneously with this notification by submittal of the Prospective Purchaser Corrective Action Plan and application.

Sincerely,

MORRIS, MANNING & MARTIN, LLP

Gerald L. Pouncey, Jr.

GLP:Enclosures  
cc: Madeleine Kellam, Georgia Brownfield Program

DEC 18 2013

6156,

# RELEASE NOTIFICATION/REPORTING FORM



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

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

## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)				
3	Tax Map and Parcel ID Number:			Acreage	7.03
4	Site or Facility Name	Town Square Shopping Center			
5	Site Street Address	3939-3987 Lawrenceville Highway			
6	Site City	Tucker	County	DeKalb	Zip
7	Property Owner	Tucker Town Square, LLC			
8	Property Owner Mailing Address	2881 Wallace Road			
9	Property Owner City	Buford	State	GA	Zip 30519
10	Property Owner Telephone No.				
11	Site Contact Person	Gerald Pouncey	Title	Environmental Attorney	
12	Site Contact Company Name	Morris Manning & Martin, LLP			
13	Site Contact Mailing Address	3343 Peachtree Road, NE			
14	Site Contact City	Atlanta	State	GA	Zip 30326
15	Site Contact Telephone No.	404-233-7000			
16	Facility Operator Contact Person			Title	
17	Facility Operator Company Name				
18	Facility Operator Mailing Address				
19	Facility Operator City			State	Zip
20	Facility Operator Telephone No.				

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

NAME (Please type or print)

TITLE

TUCKER TOWN SQUARE, LLC, a Georgia limited liability company

By: \_\_\_\_\_

J. Harold Smith, Jr.  
Manager



SIGNATURE

12/10/2013

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:**

The source of the release is unknown

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

The release date is unknown

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

Phase II sampling has been performed on the subject property.

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

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

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

**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: Hewatt residence

Address: 3925 Lawrenceville Hwy.

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: Caudill residence

Address: 2273 Hylaea Road

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

Yes       No

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

### REQUIRED ATTACHMENTS

#### 9. SITE SUMMARY

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

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

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

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

### PART III -- SOIL RELEASE INFORMATION

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

Regulated Substance	CAS Registry Number	Highest Concentration Detected Between 0-6 Inches (Specify Units)	Highest Concentration Detected Between 6-24 Inches (Specify Units)	Highest Concentration Detected Greater Than 24 Inches (Specify Units)
N/A				



## Site Summary

The subject property, Town Square Shopping Center, contains approximately 7.03 acres of land and is located at 3939-3987 Lawrenceville Highway in Tucker, Georgia. The property was purchased by Tucker Town Square, LLC on November 22, 2013. As part of pre-purchase due diligence activities, a Phase I and Phase II investigation were performed for the subject property.

Based upon the site topography and the existence of an off-site body shop in the anticipated upgradient direction, Phase II sampling was performed on the subject property to evaluate potential contamination which might have migrated onsite. Two monitoring wells were installed along the northwestern property boundary of the subject property via hollow stem auger. Groundwater was encountered at depths between 29-30 feet and samples were collected for the analysis of volatile organic compounds (VOCs) and semi-VOCs (SVOCs).

The sampling results identified di-n-butyl phthalate in MW-1 and naphthalene, 1-methyl naphthalene, 2-methyl naphthalene, and dibenzofuran in MW-2. Of the detected substances, only naphthalene (380 ug/L) and di-n-butyl phthalate (30 ug/L) are regulated under the Georgia Rules for Hazardous Site Response. The exact source of the naphthalene is unknown.

A water well survey was performed by Sailors Engineering (Sailors). One confirmed drinking water well was identified by Sailors as being located between ½ mile and 1 mile northwest and upgradient of the detected contamination.

Based upon the Reportable Quantities Screening Method (RQSM) and the lack of a drinking water well within a ½ mile radius (as confirmed by the water well survey), we believe a No Listing letter is warranted for the subject property. In addition, the new property owner is applying to the Brownfield Program within 30 days of taking title to the subject property.



Data Sources: Aerial Photography courtesy of BING Maps (ESRI Map Services)

**SEA**

**SAILORS  
ENGINEERING  
ASSOCIATES, INC.**

ENVIRONMENTAL/GEOTECHNICAL

1675 SPECTRUM DRIVE  
LAWRENCEVILLE, GEORGIA 30043  
(770) 962-5922 FAX 962-7984

**SITE PLAN**

TOWN SQUARE SHOPPING CENTER

3939-3987 Lawrenceville Highway  
Tucker, Dekalb County, Georgia

Job No. 132-071

SEA-2108



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SAILORS ENGINEERING ASSOCIATES, INC.

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1675 SPECTRUM DRIVE • LAWRENCEVILLE, GEORGIA 30043 • TEL (770) 962-5922 • FAX 962-7964

October 24, 2013

Seven Smiths Investments, L.P.  
Attn: Joseph and Harold Smith  
2881 Wallace Road  
Buford, GA 30519

RE: Potential Receptor and Water Usage Survey  
Town Square Shopping Center  
3939-3987 Lawrenceville Highway  
Tucker, DeKalb County, Georgia  
SEA Job #132-071

Gentlemen:

Sailors Engineering Associates, Inc. (SEA) has completed our survey of potential drinking water receptors for the property referenced above and nearest resident individuals to the subject property. SEA is pleased to submit this report of our findings.

To identify potential drinking water receptors within a three-mile radius of the subject property, SEA conducted a water usage survey of the surrounding area. Our survey included a search of the United States Geological Survey (USGS) water well database, a search of the Georgia Environmental Protection Division (EPD) drinking water sources database, a search of the Hazardous Site Inventory (HSI) database, a search of the 1990 United States Census data, a search of DeKalb County tax records, interviews with knowledgeable personnel at facilities and sites identified in the databases, and a one-mile windshield reconnaissance of the surrounding area. There were no drinking water wells identified in our database search. There were no files for the subject property. Several sites in the vicinity of the subject property have submitted past HSRA Release Notifications. A map of the subject area with the results of this potential receptor and water usage survey is provided as an attachment to this letter.

Residential, commercial and industrial customers are supplied water by the DeKalb County Department of Watershed Management that comes from the Chattahoochee River from the DeKalb County Raw Water Pumping Station on Holcomb Bridge Road. The raw water is treated by the Scott Candler Water Treatment Plant at 4830 Winters Chapel Road in Doraville prior to distribution throughout DeKalb County.

SEA conducted a database search of available data in October 2013 and plotted the results onto a field map for use in the windshield survey. Our search of the USGS and Georgia EPD databases did not identify any potential receptors within a one-mile radius of the subject property. One potential well was identified between one and two miles of the subject property and ten potential wells were identified in the database search between two and three miles of the subject property.

Based on prior well surveys conducted in overlapping areas, all of the database wells are known to either no longer exist or are not used for drinking water purposes.

In addition to the USGS and EPD databases, SEA reviewed DeKalb County property records for sites located in areas suspected to have wells. However, the property records for the subject area do not list public or private water usage.

On October 21 and 22, 2013, Mr. Richard Rudolph, P.G., SEA Project Geologist, conducted a windshield reconnaissance of the area within a one-mile radius of the subject property. Two suspected drinking water wells were identified within the one-mile radius of the subject property, located at 2273 Hylaea Road and 2550 Ball Park Drive, Tucker, Georgia. According to the property owner at 2273 Hylaea Road, Mr. E.H. Caudill, the well at that address is used for drinking water and all other household uses including filling his swimming pool and irrigating his yard. The well was drilled approximately four years ago and is 305 feet in depth and produces approximately 50 gallons per minute (gpm). Mr. Caudill stated he is in the filtration business and installed a filtration system including UV bacterial treatment. The Caudill Well is located just outside ½-mile west-northwest of the subject property (see attached Well Survey plan).

Mr. Mark Hubener at 2521 Ball Park Drive was interviewed. Mr. Hubener has lived in the neighborhood 44 years and had recently retired from Middle Georgia Water Systems. He primarily drilled wells for commercial and industrial businesses as well as municipalities and was unaware of any residential or public drinking water wells in the area. He related that an elderly neighbor on Ball Park Drive installed a well after a dispute with the county regarding his bill after irrigating his new lawn. Mr. Hubener stated that the well was installed 5 or 6 years ago presumably for irrigation purposes but was unsure if the well was used for drinking water. Mr. Hubener recalled that the well was between 500 and 600 feet in depth and produced approximately 5 gpm. Mr. Hubener stated that the gentleman had recently died and the house was vacant. The well is located in the front yard of 2550 Ball Park Drive and the property was owned by Mr. Edgar H. Smith, Jr. who died in December 2012. Ms. Della Lilly inherited the house from Mr. Smith. Ms. Lilly confirmed that the well was for irrigation purposes only. Upon inspection of the well SEA observed that much of the piping at the pressure tank for the well is disconnected. The Smith Well is located approximately 0.75 miles north of the subject property.

In the area of the subject site, a railroad line generally follows the top of a ridge line trending northeast, southwest. Lawrenceville Highway is parallel to the rail line in this area and is on the southern down slope side of the tracks. The subject site is further south and the topography in the immediate vicinity of the subject site drains either to the southwest toward an unnamed tributary to the South Fork of Peachtree Creek or to the southeast to another unnamed tributary to South Fork of Peachtree Creek. Surface water drainage at the subject site and the apparent groundwater flow direction are to the southeast, away from Lawrenceville Highway and the drinking water well to the northwest. Further, the drinking water well identified to the northwest is located on the northern side of Burnt Fork Creek, with drainage flowing south toward the creek from the drinking water well location. Based on topography, surface water features and apparent groundwater flow directions, it is our opinion that the drinking water well located at 2273 Hylaea Road is up gradient and not hydraulically connected to the subject site.

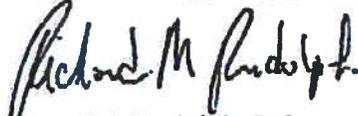
As part of our survey, the nearest resident individual was located with regard to the Town Center Shopping Center property. For the purposes of our survey, a resident individual is defined as a home, school, playground, daycare or nursing home. The nearest resident individual was identified as James A. and Robert Hewatt at 3925 Lawrenceville Highway located on the corner of Lawrenceville Highway and Morris Avenue, directly across Morris Avenue, west of the subject site.

We have included a Potential Receptor and Water Usage Survey Plan that shows the location of the confirmed drinking water well identified during our survey. Our water well survey identified one confirmed drinking water well just outside ½-mile radius of the subject property, the Caudill Well, located northwest and upgradient of the subject site.

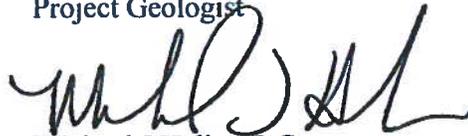
If we can be of further service to you on this project, please contact us at your convenience.

Respectfully submitted,

SAILORS ENGINEERING ASSOCIATES, INC.



Richard M. Rudolph, P.G.,  
Project Geologist



Michael J. Haller, P.G.,  
Manager, Environmental Engineering

## GROUNDWATER PATHWAY

			SCORE:
<b>HAS A RELEASE TO GROUNDWATER OCCURRED?</b> Known (45)    Suspected (10)    Potential Future (5)    No Release (0) (If 45, go to D)			A.    45
<b>SUSCEPTIBILITY RATING:</b> Higher (6)    Average (3)    Lower (0)			1B.
<b>PHYSICAL STATE:</b> Stable Solid (0)    Unstable Solid (1)    Powder/Ash (2)    Liquid/Gas/Sludge (3)			2B.
<b>CONTAINMENT:</b> Very Good (0)    Good (1)    Fair (2)    Poor (3)			C.
<b>REGULATED SUBSTANCE:</b>	CAS#	Name <i>Naphthalene</i>	1D.
<b>TOXICITY:</b> None (0)    Low (1)    (2)    (3)    (4)    (8)    (16) High			2D.    4
<b>QUANTITY:</b> Threshold (1)    (2)    (3)    (4)    (5)    (6)    (7)    (8) Very Large			3D.    4
<b>EXPOSURE TO GROUNDWATER RELEASE:</b> Known release ≥ MCL and known human exposure ≥ MCL (25) Known release ≥ MCL and suspected human exposure (20) Known release, no MCL exists, and known human exposure (18) Known release ≥ MCL and known human exposure < MCL (15) Known release, no MCL, and suspected human exposure (12) Suspected release and human exposure suspected (6) Known release ≥ MCL but no human exposure suspected (4) Known release, no MCL and no human exposure suspected (3) Suspected release, but no human exposure suspected (2) Potential future release (1) Known release < MCL (0)			1E.    3
<b>DISTANCE TO WELL OR SPRING:</b> < 1/4 mile (16)    1/2 - 1 mile (9)    1 - 2 miles (4)    2 - 3 miles (1)    > 3 miles (0)			2E.    9
<b>GROUNDWATER PATHWAY SCORE:</b> <b>THRESHOLD: 10</b>			9.75

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

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

If A = 45 then M = 45.

If 2D is unknown, then 2D = 4.

If 3D is unknown, then 3D = 4.

If 1E includes known or suspected human exposure, then 2E = 16.

If 1E = 0, then 2E = 1.

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

$$45 \times (4 + 4) \times (3 + 9) / 442.8 = 9.75$$

6157.

# 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

RECEIVED  
Georgia EPO  
DEC 9 2013  
Response and Remediation Program

## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	GAD980515241			
3	Tax Map and Parcel ID Number:	Map/Title: CD030102/4 CD031103, Parcels: C02 0430025, C02 0430161	Acreage	111	
4	Site or Facility Name	Sony Music Holdings Inc., Property of			
5	Site Street Address	5152 Columbia Drive			
6	Site City	Carrollton	County	Carroll	Zip 30117
7	Property Owner	Sony Music Holdings Inc.			
8	Property Owner Mailing Address	C/o Leggette, Brashears & Graham Inc., 4 Research Drive, Suite 301			
9	Property Owner City	Shelton	State	CT	Zip 06484
10	Property Owner Telephone No.	203-929-8555			
11	Site Contact Person	c/o Michael Manolakas	Title	Senior Vice President	
12	Site Contact Company Name	Leggette, Brashears & Graham Inc.			
13	Site Contact Mailing Address	4 Research Drive, Suite 301			
14	Site Contact City	Shelton	State	CT	Zip 06484
15	Site Contact Telephone No.	203-929-8555			
16	Facility Operator Contact Person	N/A	Title		
17	Facility Operator Company Name				
18	Facility Operator Mailing Address				
19	Facility Operator City		State		Zip
20	Facility Operator Telephone No.				

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

NAME (Please type or print)

*Michael L. Mitchell*

TITLE

*Exec. VP & CTO*

SIGNATURE

DATE

*12-17-2013*

## 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:

The constituents detected above notification criteria in soil and groundwater in the exterior area east of the main building (figure 2) were identified in the vicinity of a former wastewater UST and wastewater and sewer piping. The source of tetrahydrofuran in the main building basement is unknown. Tetrahydrofuran in the tape coating area was released from site operations and spills in this area. The sources of the 1,1,2-Trichloro-1,2,2-Trifluoroethane, antimony, thallium, mercury, bromodichloromethane, chloroform, and di-n-butyl phthalate detected in groundwater are not known. The source of constituents detected in groundwater in the former surface impoundment area and in groundwater grab sample SB2-1 is not known. The source of trichloroethene detected in the groundwater grab sample (SB-17) in the southwestern corner of the site is not known. Information was obtained from review environmental records located on site and interviews with site personnel.

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.):  
Manufacturing operations began in 1981 and ended in 2001. Releases are suspected or known to have occurred during this period. The site was used as a warehouse and packaging facility until 2013, when all operations ended. No releases are suspected during this period. The physical state and 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).  
The releases were identified during soil and groundwater sampling by URS Corporation, which included direct-push soil borings, installation of new monitoring wells and sampling existing monitoring wells. Some of these releases were included in previous release notifications but supplemental data was collected in these areas. Further delineation of the releases identified is planned. Limited remediation was performed in 1986 to address tetrahydrofuran released in the tape coating area. The former surface impoundment was remediated and Sony received equivalency clean closure approval from GA EPD in 1998.

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.

Security personnel at the site perform 24-hour surveillance both in person and through a closed-circuit television surveillance system. The tape coating area, the building basement where tetrahydrofuran was identified in soil, and the former surface impoundment are also surrounded by fence or are within the locked building.

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.

Acetone, methylene chloride, silver, tetrachloroethene and trichloroethene were detected above the notification criteria at 10 feet below grade and deeper; the material above this depth consisted of loose soil. Tetrahydrofuran was detected in soil beneath the building slab. Tetrahydrofuran detected outside of the building was covered by 0 (uncovered) to 7.5 feet of loose soil. Surface material in this area primarily consists of concrete and gravel.

## 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: Gregory E Bussard & Ann E McCleary

Address: 88 Plowshare Road, Carrollton, GA 30117

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: DJ Wysner

Address: 782 Beulah Church Road, Carrollton, GA 30117

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

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.***

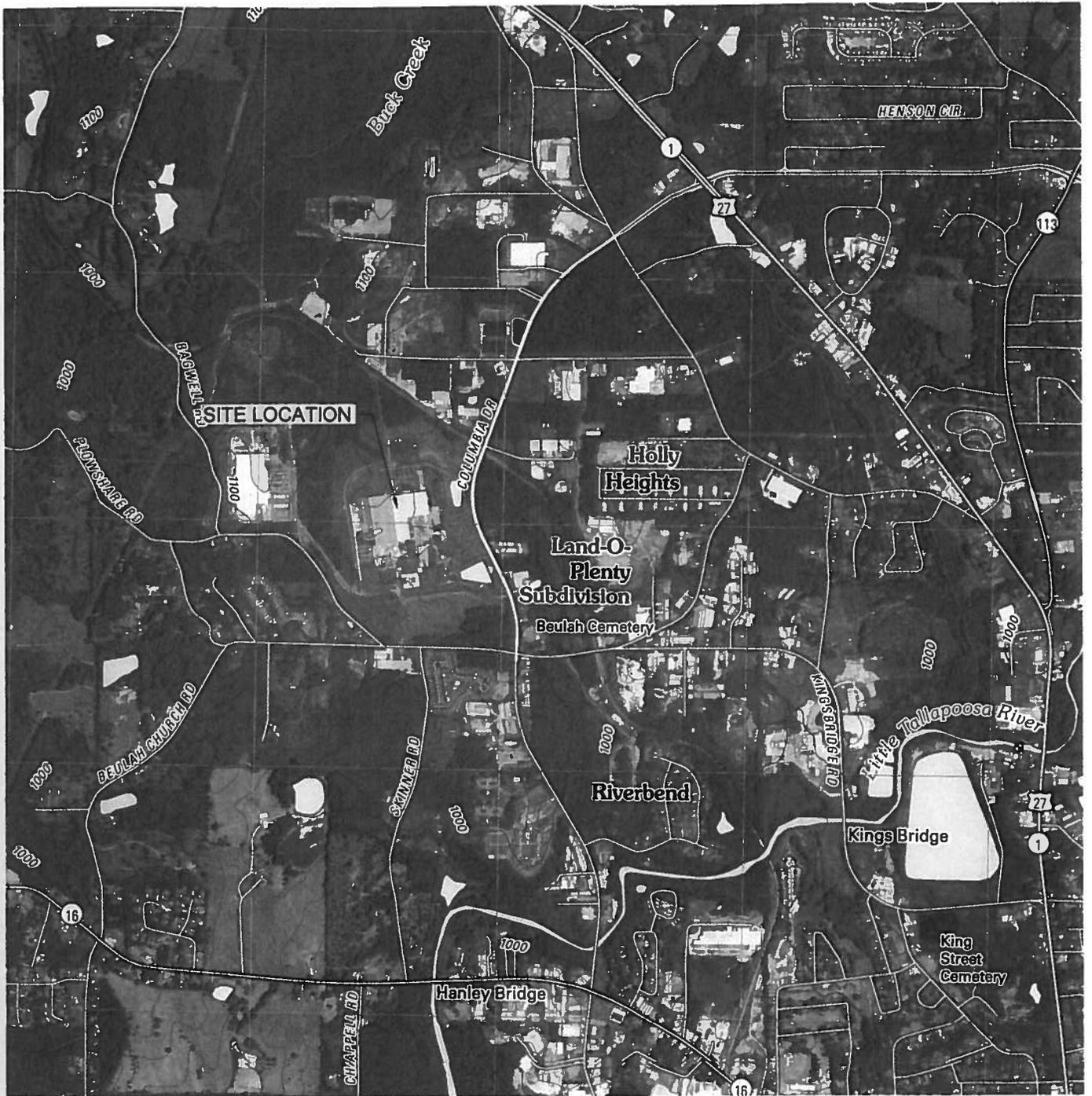
Regulated Substance	CAS Registry Number	Highest Detected Concentration (Specify Units)	Sample Depth Below Ground Surface (Feet)
1,1,2-Trichloro-1,2,2-Trifluoroethane	76131	137 ug/L	21.85
4-methyl-2-pentanone (MIBK)	108101	12.1 ug/L	27
Acetone	67641	12.1 ug/L	57
Benzene	71432	0.29 ug/L	27
Bis(2-ethylhexyl)phthalate	117817	4.6 ug/L	23
Bromodichloromethane	75274	0.86 ug/L	21.8
Chloroform	67663	24.4 ug/L	21.8
Cis-1,2-dichloroethene	156592	442 ug/L	27
Di-n-butyl phthalate	84742	2.87 ug/L	17
Ethylbenzene	100414	43 ug/L	27
Isopropylbenzene	98828	73.4 ug/L	27
Naphthalene	91203	48.4 ug/L	27
m- & p-xylenes	108383, 10642	162 ug/L	27
o-xylene	95476	574 ug/L	27
Tetrachloroethene	127184	930 ug/L	27
Tetrahydrofuran	109999	171 ug/L	17

## 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)
Toluene	108883	10.4 ug/L	27
Trans-1,2-dichloroethene	156605	1.44 ug/L	27
Trichloroethene	79016	513 ug/L	27
Vinyl chloride	75014	0.45 ug/L	27
Antimony	7440360	13.1 ug/L	22
Nickel	7440020	54,500 ug/L	27
Thallium	7440280	8 ug/L	22
Mercury	7439976	0.486 ug/L	22



SOURCE: USGS TOPOGRAPHIC QUADRANGLE CARROLLTON, GEORGIA 2011.



**SONY MUSIC HOLDINGS, INC., PROPERTY OF  
5152 COLUMBIA DRIVE  
CARROLLTON, GEORGIA**

**SITE LOCATION MAP**

DATE	REVISED	PREPARED BY:
		<b>LEGGETTE, BRASHEARS &amp; GRAHAM, INC.</b>
		Professional Groundwater and Environmental Engineering Services
		4 Research Drive
		Suite 301
		Shelton, Connecticut 06484
		(203) 929-8555
<b>DRAWN:</b>	MRV	<b>CHECKED:</b> SL
		<b>DATE:</b> 12/17/13
		<b>FIGURE:</b> 1

