POWELL GOLDSTEIN LLP

Atlanta ▪ Washington

RESIDENT IN ATLANTA OFFICE
DIRECT DIAL: (404) 572- 6647
JSASINE@POGOLAW.COM

Robby,
Please file with the Ga State Piedmont Ellis Housing Project file (environmental).
Thanks,
Mark

September 12, 2005

Mr. Marty Nance, Executive Director
Real Estate Ventures
Board of Regents of the University System of Georgia
270 Washington Street, SW
Atlanta, Georgia 30334

Re: Georgia State University Housing Project
(former Beaudry Ford property)

Dear Mr. Nance:

Enclosed for your file is a copy of the September 6, 2005 Phase I Environmental Assessment Update ("report") for the above-referenced property prepared by United Consulting ("United"). United states in the report, that the recognized environmental conditions have been addressed. No further action is recommended by United.

If you have any questions, please do not hesitate to call me.

Very truly yours,

Joan B. Sasine

Joan B. Sasine
Special Assistant Attorney General

JBS:cl
Enclosure

cc: Denise Whiting-Pack, Esq. (w/out enclosure)
Mr. Mark Demyanek (w/enclosure)

Received
SEP 15 2005
Office of
Environmental
Affairs

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148249.00000

REPORT OF

PHASE I ENVIRONMENTAL ASSESSMENT UPDATE
ON THE
GEORGIA STATE UNIVERSITY HOUSING PROJECT
FORMER BEAUDRY FORD
141 PIEDMONT AVENUE
ATLANTA, FULTON COUNTY, GEORGIA

FOR

PIEDMONT/ELLIS, LLC
C/O CRAIG PENDERGRAST, SEYFARTH SHAW
1545 PEACHTREE STREET, NE
SUITE 700
ATLANTA, GEORGIA 30309

AND

BOARD OF REGENTS OF THE UNIVERSITY SYSTEM OF GEORGIA
C/O JOAN SASINE, POWELL GOLDSTEIN LLP
ONE ATLANTIC CENTER - FOURTEENTH FLOOR
1201 WEST PEACHTREE STREET, NW
ATLANTA, GEORGIA 30309-3488

PROJECT NO. 2004.1249.15

UNITED CONSULTING

We're here for you

UNITED CONSULTING

September 6, 2005

Piedmont/Ellis, LLC
c/o Craig Pendergrast, Seyfarth Shaw
1545 Peachtree Street, NE, Suite 700
Atlanta, Georgia 30309
E-Mail: cpendergrast@seyfarth.com

Board of Regents of the University System of Georgia
c/o Joan Sasine, Powell Goldstein LLP
One Atlantic Center - Fourteenth Floor
1201 West Peachtree Street, NW
Atlanta, Georgia 30309-3488
E-mail: jsasine@PGFM.com

RE: Phase I Environmental Assessment Update
Georgia State University Housing
Former Beaudry Ford Company
141 Piedmont Avenue
Atlanta, Fulton County, Georgia
Project No. 2004.1249.15

Dear Mr. Pendergrast and Ms. Sasine:

United Consulting is pleased to submit this report of our Phase I Environmental Assessment Update for the **Georgia State University Housing Property**. We appreciate the opportunity to assist you with this project. Please contact us if you have any questions or if we can be of further assistance.

Sincerely,

UNITED CONSULTING

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

John F. Clerici, P.E.
Chief Environmental Consultant

RCG/JFC/ljr
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625 HOLCOMB BRIDGE ROAD ♦ NORCROSS, GEORGIA 30071
Tel: 770/209-0029 ♦ Fax: 770/582-2900 ♦ Client Service: 800/266-0990
Web: http://www.unitedconsulting.com ♦ E-mail: united@unitedconsulting.com

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EXECUTIVE SUMMARY[1]

United Consulting has completed a Phase I Environmental Assessment Update on the **Georgia State University Housing Property**, referenced by the address of 141 Piedmont Avenue in, Fulton County, Atlanta, Georgia. This property is hereafter referred to in this report as the Project Site. The results from this investigation are briefly summarized below. The text of the report should be reviewed for a discussion of these items.

1. The Project Site consisted of an approximate 4.15-acre tract of land, which was in the process of being graded for the construction of a student housing complex. Historically, the Project Site was developed with a dry cleaning facility, a fueling facility and an automotive sales and service facility.

2. The Project Site was listed as an underground storage tank (UST), leaking underground storage tank (LUST) and Non-Hazardous Site Inventory (HSI) facility on the State environmental databases reviewed. Soil and groundwater impacts were previously reported to the Georgia Environmental Protection Division's (EPD) Underground Storage Tank Management Program (USTMP) and Hazardous Site Response Program (HSRP). The USTMP issued two "No Further Action" (NFA) letters for the impacts associated with USTs. In addition, for releases of tetrachloroethene (PCE), the HSRP had issued two non-listing letters for either groundwater or soil impacts based upon the conditions existing with respect to the Site at the time of such letters.

3. Under the auspices of the Georgia Hazardous Site Reuse and Redevelopment Act (HSRRA) and in order to avoid listing of the Project Site on the Hazardous Site Inventory of the HSRP during or after redevelopment, a voluntary Corrective Action Plan (VCAP) has been prepared and implemented at the Project Site, which included the collection of additional soil and groundwater data, and corrective action operations. Groundwater conditions were assessed near the property lines and interior to the Project Site. Corrective actions included the removal of about 8,000 tons of impacted soils. A voluntary Compliance Status Report (VCSR) was then prepared, which certified that the soils at the Project Site meet the applicable residential RRS. The EPD then issued a limitation of liability confirmation letter (LoL) dated September 6, 2005 for the Board of Regents of the University System of Georgia, Piedmont/Ellis, LLC, and their successors-in-interest with respect to the Project Site .

4. Thirty-four listed regulated facilities were identified within the prescribed search distances from the Project Site. In United Consulting's opinion, one of these facilities has likely impacted the Project Site at this time (BP No. 24023, current Shell Station). This was also previously recognized by the USTMP.

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1 This Executive Summary is not intended to be used or relied upon without reference to the entire report and cannot otherwise be properly understood and interpreted. It is provided solely for the convenience of the Client and other authorized parties and not as a substitute for the report or review of the report.

5. Based on the data collected at the site to date, soil and groundwater impacts exist at the Project Site, from both on and off-site sources. Therefore recognized environmental conditions (RECs) have existed in connection with the Project Site. However, with site remediation and the EPD's issuance of a LoL for the Project Site, in United Consulting's opinion, the RECs have been addressed, and no further actions are warranted at this time.

2.0 INTRODUCTION

2.1 Purpose

United Consulting was retained by the Piedmont Ellis LLC to perform a Phase I Environmental Assessment Update of the Project Site. The purpose of this assessment was to determine whether there is evidence of recognized environmental conditions in connection to the Project Site. The protocol used for this assessment is in substantial conformance with the American Society for Testing and Materials (ASTM) Practice E1527-00, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

Recognized environmental conditions (RECs) is a term defined by ASTM as the presence or likely presence of hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property.

Recognized environmental conditions do not include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be subject to an enforcement action if brought to the attention of government agencies. Recognized environmental conditions also do not include items such as asbestos-containing materials, radon, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality and high voltage power lines. United Consulting can assist you with these non-scope items if needed.

The Practice E 1527-00 was developed to establish the Innocent Landowners Defense and the Prospective Purchaser Defense provided for in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The ASTM approach constitutes a limited, but commercially prudent and reasonable, inquiry. This assessment was therefore performed to identify environmental concerns that may be discerned by visual observation and information-gathering procedures.

2.2 Scope

The scope of our services, which follows ASTM Standard E 1527-00, included the following items:

1. Reconnaissance of the Project Site and surrounding area, with a focus on environmental issues;

2. Research of readily available Federal and State environmental agency records for evidence of hazardous substance or related activities on or near the Project Site;

3. Interviews with the owner of, and individuals familiar with, the Project Site to assess past and present activities which may have impacted the Project Site; and

4. Preparation of this report to document the results of the site reconnaissance, historical and regulatory research and interviews, and to provide United Consulting's professional opinion of the environmental condition of the Project Site.

2.3 Significant Assumptions

This Assessment was based on the assumption that the Project Site will be developed for student housing.

2.4 Limitations

United Consulting has performed appropriate inquiry for this Phase I Environmental Site Assessment Update is in general conformance with the scope and limitations of ASTM Practice E 1527-00. In accordance with this practice, asbestos, mold, lead testing, radon, endangered species and wetlands work are excluded from the scope of work for Phase I Update assessments. No environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a site. United Consulting's assessment is based on a visual evaluation of the surficial conditions, and is our professional opinion, only. No other warranty or guarantee is expressed or implied. This report must be considered in its entirety.

United Consulting's conclusions, opinions and suggestions have been prepared using generally accepted standards prevailing within the relevant disciplines as practiced within the southeastern United States. Nothing contained within this report is intended to supersede or replace the judgment of the Client. All decisions relating to the aforementioned project or site are the sole responsibility of said user(s).

Our conclusions, opinions and suggestions are based upon information furnished to us, including governmental records, as well as United Consulting's professional experience. This assessment may not detect or account for all conditions or factors present at a project area or Project Site. Should such unexpected conditions or factors become manifest during subsequent activities at a site, it will be necessary for United Consulting to review and re-evaluate any and all conclusions, opinions and suggestions made with respect to this project or Project Site. Accordingly, United Consulting should be contacted immediately in such a situation.

2.5 Special Terms and Conditions

The terms and conditions for this Phase I Environmental Assessment Update were set forth in our August 12, 2005 Proposal, which was executed on August 23, 2005.

2.6 User Reliance

This report is for the exclusive use of the Board of Regents of the University System of Georgia, Georgia State University, Georgia State University Foundation, Piedmont/Ellis, LLC, the Atlanta Development Authority, and the Bank of New York Trust Company, N.A. and may be used only in reference to the project described herein. United Consulting is not responsible for the conclusions, opinions or recommendations of others.

The right to rely upon this report and the data herein may not be assigned without the express written permission of United Consulting. As a prerequisite for the granting of such permission, the third-party user(s) (including, but not limited to, the Client's successors and assigns) must agree to be bound by the terms and conditions of the original agreement between United Consulting and the Client. Further, reliance is dependent on similar uses of the property and the document.

3.0 SITE DESCRIPTION

3.1 Location and Legal Description

The Project Site is referenced by the address of 141 Piedmont Avenue. The Project Site was located in Land Lot 51 of the 14th District, Fulton County, Atlanta, Georgia. A previously provided site survey of the Project Site, provided by Ambling Development Company, was used as a guide to locate the boundaries of the Project Site during the site reconnaissance. The Project Site consisted of about 4.15 acres located northeast of the intersection of John Wesley Dobbs Avenue and Piedmont Avenue. The general location of the Project Site is illustrated on Figure 1.

3.2 Site and Vicinity General Characteristics

The Project Site consisted of about 4.15-acres of previously developed land. At the time of our site visit, the Project Site was vacant and undergoing grading operations. The properties surrounding the Project Site were developed with office buildings, hotels, a gasoline service station and parking decks.

3.3 Current Use of Project Site

A site reconnaissance was conducted on August 24, 2005. At that time, the Project Site was being graded and was under development.

3.4 Description of Structures, Roads, Other Improvements on the Project Site

At the time of the site reconnaissance, the Project Site was vacant and contained no structures. The majority of the site was undergoing grading and consisted of exposed soils. A small area of asphalt paving remained on the southwestern portion of the Project Site. The Project Site was

bordered by John Wesley Dobbs Avenue, Piedmont Avenue, Ellis Street and Jesse Hill Jr. Drive. Public utilities are available for the Project Site.

3.5 Current Use of Adjoining Properties

Properties surrounding the Project Site consisted of office buildings, parking decks, hotels and a service station.

4.0 BACKGROUND INFORMATION

The Project Site was developed with residential and commercial structures from 1899 through development of the Beaudry Ford facility structures in the 1960s. Known historical commercial operations at the Project Site included a filling station and a dry cleaning facility, from about 1932 until 1962. Underground storage tanks (USTs) from those two facilities were apparently removed from the Project Site prior to the development of the most recent site structures, consisting of the Beaudry Ford facility, which was constructed on the Project Site by 1972.

Previous investigations conducted at the Project Site that were reviewed for this update included a Phase I Environmental Site Assessment prepared by United Consulting, dated November 2, 2004, a Phase I Environmental Site Assessment (Phase I), prepared by Clayton Group Services (Clayton), dated August 6, 2002. A Phase II Environmental Site Assessment (Phase II), prepared by Clayton, dated August 12, 2002. Additionally, an environmental report prepared by URS and a Phase II Environmental Assessment report prepared by Golder Associates Inc. (Golder) in 2002 were referenced in the Phase I performed by Clayton, but were not available for review.

The Phase I performed by Clayton identified numerous RECs including:

- A former filling station on the southwest corner of the Project Site, at the intersection of Piedmont Avenue and John Wesley Dobbs Avenue;
- A former dry cleaners on the northwest corner of the Project Site;
- Approximately 35 hydraulic lifts on the Project Site;
- An on-site oil/water separator, connected to trench drains from the Service Department, on the Project Site;
- Four former USTs, including 2 waste oil USTs and 2 new oil USTs, on the Project Site; and
- Multiple regulated facilities surrounding the Project Site.

The August 2002 Phase II Environmental Assessment performed by Clayton included installing borings and wells, and sampling soil and groundwater from four monitoring wells, designated TW-1 through TW-4. These testing locations were selected to assess four of the aforementioned RECs: the former dry cleaners, TW-1; the former new oil USTs, TW-2; and the former filling station and the surrounding regulated facilities, TW-4. [TW-3 was not located on the Project Site, but on a separate parcel to the south of the Project Site] Subsurface investigations were not

conducted in the direct areas of the two remaining RECs. However, recommendations were made to remove the trench drains and oil/water separator and to remove the remaining hydraulic lifts and any affected soils (Golder previously collected limited soil data in the area of numerous hydraulic lifts).

Soil and groundwater impacts found in the course of the Phase II Environmental Assessment included only petroleum and dry cleaning related constituents. Regulatory reporting of the petroleum related constituents was made to the Georgia Environmental Protection Division's (EPD's) Underground Storage Tank Management Program (USTMP). Regulatory reporting of the dry cleaning related constituents was made to the Hazardous Sites Response Program (HSRP).

United Consulting conducted a Phase I Environmental Assessment at the Project Site dated November 2, 2004. This assessment found that the Project Site consisted of an approximate 4.15-acre tract of land developed with three buildings that formerly housed an automobile dealership and repair facilities. The Project Site had been developed with various residential and commercial structures from 1899 through the construction of the automobile dealership structures in the 1960s. The Phase I Assessment was conducted with the understanding that the client desired to develop the Project Site with student housing. The Project Site was listed as a regulated site on the State environmental databases reviewed. The Project Site was listed on the UST, leaking underground storage tank (LUST), and non-hazardous site inventory (NON-HSI) databases. Thirty-two listed regulated facilities were identified within the prescribed search distances of the Project Site. Based on the regulatory files reviewed and area topography, one of these facilities, the adjacent former BP No. 24023 (aka Shell Station), was determined to be a REC to the Project Site. United Consulting recommended further environmental assessment of the Project Site to determine the extent of impacts from historic activities involving currently regulated substances at the Project Site and impacts from the off-site former BP No. 24013.

United Consulting conducted a Phase II Environmental Assessment at the Project Site, report dated January 5, 2005, which included advancing four direct push borings. Three of the borings were converted into groundwater monitoring wells. The borings were placed to determine if groundwater in the western portion of the proposed parking deck was impacted. Five soil samples were obtained from the borings. The soil samples were analyzed for volatile organic compounds (VOCs), total petroleum hydrocarbons-diesel range organics (TPH-DRO), total petroleum hydrocarbons-gasoline range organics (TPH-GRO), and RCRA metals. Numerous RCRA metals and elevated concentrations of TPH-DRO and/or TPH-GRO were detected. One VOC constituent, tetrachloroethene (PCE), was detected in the soil at a concentration above the HSRP notification concentration (NC). Groundwater samples from the borings were analyzed for VOCs. Based on the analytical results, VOC impacts were not found to the groundwater. Based on the results of the Phase II Environmental Assessment, United Consulting recommended that further assessment of the Project Site be conducted to determine the extent of the soil and potential groundwater impacts to the northwestern portion of the Project Site.

United Consulting conducted a Supplemental Phase II Environmental Assessment at the Project Site, report dated January 19, 2005. The purpose of the Supplemental Phase II was to assess the

extent of impacted soils and install monitoring wells to permit the future evaluation of groundwater in the northwestern portion of the Project Site. The northwestern corner of the Project Site was historically developed with a dry cleaning facility, automotive repair facility and potentially other commercial facilities. Eight direct push borings and two hand auger borings were advanced at the Project Site for this assessment. Five of the borings were converted into groundwater monitoring wells. Nineteen soil samples were obtained and submitted for analytical testing for chlorinated volatile organic compounds (CVOCs). One of the samples was also submitted for CVOC analysis by the toxicity characteristic leaching procedure (TCLP). The analytical results indicated the presence of PCE in nine of the nineteen soils samples at concentrations exceeding the HSRP NC. The TCLP analysis indicated that the soils did not show leaching concentrations above the regulatory levels. Based on the analytical results from the soil samples, United Consulting estimated that approximately 4,200 tons of PCE soils would require removal from the Project Site prior to development, to avoid the Project Site being listed on the HSI.

During the assessments outlined above, soil and groundwater impacts were detected, which were reported to the USTMP and HSRP. The USTMP issued two "No Further Action" (NFA) letters for the impacts associated with the USTs. In addition, for releases of tetrachloroethene (also known as perchloroethylene, perc, or PCE), the HSRP has issued two letters stating that "the site will not be listed on the Hazardous Site Inventory (HSI)" (hereinafter referred to as a non-listing letter) under HSRA for either groundwater or soil impacts based upon the conditions existing with respect to the Site at the time of such letters.

In conjunction with the issuance of the second non-listing letter, the HSRP cautioned that the redevelopment process was likely to result in a change of parameters under the RQSM scoring method used as the basis for the non-listing letter, and that accordingly redevelopment would likely result in the listing of the Project site on the HSI. In order to avoid the regulatory requirements that would have resulted from such a HSI listing, Piedmont/Ellis, LLC, acting through United Consulting, submitted a Voluntary Corrective Action Plan (VCAP) and Brownfields Application, dated July 1, 2005, under the auspices of the HSRAA to the Georgia EPD. . The VCAP stated that the lateral and vertical extent of PCE, lead and other chemicals had been delineated to below analytical detection limits for the soils. Groundwater flow was determined to be to the east from data gathered from the previously installed monitoring wells. Impacts to groundwater were also laterally delineated using the previously installed monitoring wells. The VCAP also called for additional assessment in some areas. The VCAP stated that the impacted soils would be removed from the Project Site and properly disposed of at a licensed facility. The soils would be tested analytically to determine if further excavations would be required during the remedial excavation. The VCAP further stated that after remedial actions were completed, a Voluntary Compliance Status Report (VCSR) would be submitted to the EPD documenting the compliance of the Project Site with the appropriate soil risk reduction standards (RRS). The EPD issued an Brownfields qualification/VCAP approval letter dated July 5, 2005. On August 16, 2005, the VCAP was amended to address additional chemicals identified in the course of the VCAP implementation and to add the Board of Regents of the University System of Georgia as a prospective purchaser for purposes of the liability protections under HSRRA.

The VCAP was implemented at the Project Site shortly following the approval by the EPD. Approximately 8,000 tons of impacted soils were removed from five areas of the Project Site. Verification sampling was conducted to demonstrate the removal of impacted soils greater than the applicable residential RRS. United Consulting, on behalf of Piedmont Ellis and the Board of Regents, submitted a VCSR to the Georgia EPD, report dated August 17, 2005, which certified that the soil at the site meets residential RRS under the HSRP. Pursuant to the provisions of the HSRRA, the EPD issued a limitation of liability (LoL) letter dated September 6, 2005 to Piedmont/Ellis, LLC and the Board of Regents of the University System of Georgia with respect to soil and groundwater impacts relating to the Project Site.

Further details of the history of the Project Site are contained in VCSR, which is reproduced in part in Appendix G. A copy of the EPD LoL letter is also included.

5.0 USER PROVIDED INFORMATION

5.1 Owner, Property Manager, and Occupant Information

The Project Site was vacant, generally cleared, and in the process of being graded for the construction of student housing for Georgia State University at the time of this assessment. The owner of the Project Site is Piedmont Ellis LLC.

5.2 Reason for Performing Phase I Update

This Phase I Environmental Assessment Update was conducted with the understanding that the Board of Regents will be taking title to the property and the property will be developed with student housing.

6.0 RECORDS REVIEW

6.1 Standard Environmental Record Sources

Reasonably ascertainable Federal and State environmental agency records were reviewed for evidence of regulated or investigated facilities within the minimum search distance outlined by ASTM E 1527-00. The search distances are for the Project Site, adjoining properties, property within 0.5 mile, or property within 1.0 mile. Generally, the listed facilities were field located an only those facilities within the respective ASTM search distances are referenced in this report. Copies of the database reports used for the regulatory agency review, with a description of each and their acronyms, are included in Appendix A. The databases reviewed are listed below. The facilities identified and search records reviewed are listed in Table 1.

TABLE 1: REGULATORY DATABASES REVIEW SUMMARY

DATABASE	DATE UPDATED	NUMBER AT PROJECT SITE	NUMBER WITHIN SEARCH RADII
ASTM SEARCH RADII: 1-MILE			
United States Environmental Protection Agency (US EPA) National Priority List (**NPL**)	May 2005	0	0
US EPA **CORRACTS** database	June 2005	0	0
Georgia EPD Hazardous Site Inventory (**HSI**), also referred to as the State Priority List (**SPL**) or State Superfund	July 2004	0	**1**
ASTM SEARCH RADII: 1/2-MILE			
US EPA Resource Conservation and Recovery Act – Treatment, Storage and Disposal (**RCRA TSD**) Facilities List	May 2005	0	0
US EPA Comprehensive Environmental Response, Compensation, and Liability Information System (**CERCLIS**) database	June 2005	0	**1**
US EPA CERCLIS, No Further Remedial Action Planned (**NFRAP**) database	May 2005	0	0
Georgia Compensation, and Liability Information System (**SCL**) also referred to as **Non-HSI**.	April 2005	**1**	**11**
Georgia Leaking UST List (**LUST**)	June 2005	**1**	**20**
Georgia Environmental Protection Division (EPD) Operating Solid Waste Facilities List (**SWLF**)	May 2005	0	0
ASTM SEARCH RADII: PROPERTY AND ADJACENT			
Georgia EPD Registered Underground Storage Tanks (**UST**) List	January 2005	**1**	0
US EPA Resource Conservation and Recovery Act (RCRA) Generators database (**GNRTR**)	May 2005	0	**1**
ASTM SEARCH RADII: PROPERTY ONLY			
US EPA Emergency Response Network System (**ERNS**) and Georgia Spills List database (**SPILLS**)	December 2004/ April 2005	0	0

DATABASE	DATE UPDATED	NUMBER AT PROJECT SITE	NUMBER WITHIN SEARCH RADII
NOTES: The list/database information was obtained from Environmental Data Resources, Inc. (EDR). EDR updates their system information routinely. Their databases are derived from databases developed by various government agencies. United Consulting cannot warrant the accuracy of the information included in these databases. The EDR data was relied upon for this Assessment.			

Listed Regulated Facilities

The Project Site was listed as an UST, LUST, and NON-HSI facility. There were thirty-four listed regulated facilities identified within the various search distances from the Project Site. Table 2 lists each of the facilities identified and their relative location to the Project Site, along with the likely potential for impacting the Project Site. A discussion of the regulated facilities that may have an impact to the Project Site, including reviews of regulatory files, is provided below.

1. Former Beaudry Ford
   141 Piedmont Avenue
   (Project Site)

Four USTs were previously present at this facility. Numerous subsurface investigations have been conducted at the Project Site since 2002. During those assessments soil and groundwater impacts were detected, which were reported to the USTMP and HSRP. The USTMP issued two NFA letters for the impacts associated with the USTs. In addition, for releases of PCE, the HSRP has issued two non-listing letters for either groundwater or soil impacts based upon the conditions existing with respect to the Site at the time of such letters. These conditions and facility operations at the Project Site are, in United Consulting's opinion, RECs.

2. BP No. 24023, current Shell Station
   158 Houston Street @ Piedmont
   (Adjacent to the southwest of the Project Site)

This facility reported a release in May 2001. A Corrective Action Plan, Part A (CAP-A) was submitted in July of 2001. The facility had four 4,000 gallon gasoline USTs and one 1,000 gallon used oil UST removed in 1988. The facility currently has three 10,000 gasoline USTs present. Maximum concentration of total benzene, toluene, ethylbenzene, and xylenes (BTEX) in the groundwater at this facility was reported to be 9,520 micrograms per liter (ug/L). Groundwater flow at this facility has been documented to flow east-southeast towards the Project Site. Impacts to the groundwater at the Project Site have been attributed to releases from this facility. This was recognized by the USTMP in an EPD letter dated December 3, 2003. United Consulting's opinion is that this facility is a REC.

Three new listed regulated facilities were identified since the original Phase I in November 2004. The new listed regulated facilities are listed in italics in Table 2. Based on the facilities'

topographic locations to the Project Site, United Consulting's opinion is that the facilities are not RECs to the Project Site.

Orphan Facilities

Based on our map review, the thirty-six listed orphan facilities do not appear to be located within the ASTM distances from the Project Site and are therefore not considered RECs.

TABLE 2: SUMMARY OF REGULATED FACILITIES

No.	Facility & Address	Program	Approximate distance & Direction	Hydraulic Relation	Potential Impact, Y/N
1	**Beaudry Ford Inc. 141 Piedmont Avenue**	**UST, LUST, Non-HSI**	**Project Site**	--	**Y**
2	Beaudry Ford 200 Houston Street	SQG, FINDS	Adjacent to the south	Side Gradient	N
3	**BP No. 24023 current Shell Station 158 Houston St @ Piedmont**	**UST, LUST**	**Adjacent to the southwest**	**Up gradient**	**Y**
4	Georgia State University Foundation 101 Piedmont Ave	LUST	500 feet southwest	Side Gradient	N
5	Hertz Rental Car Location 157 Houston Street	LUST, UST	500 feet north	Side gradient	N
6	Fire Station No. 4 125 Ellis St NE	UST, LUST	800 feet west northwest	Side Gradient	N
7	Fulton County Health Department 99 Butler St NE	UST, LUST	1,000 feet southeast	Down Gradient	N
8	Oscar S Hall Jr 215 Auburn Ave.	UST, LUST	900 feet east southeast	Down Gradient	N
9	Chavez Downtown Properties International @ Courtland	Non-HSI	850 feet northwest	Side Gradient	N
10	Avis Rent a Car System Inc. 143 Courtland Street NE	LUST	850 feet west northwest	Side Gradient	N
11	Bank of Nova Scotia Site International @ Courtland	Non-HSI	850 feet northwest	Side Gradient	N
12	Budget Rent A Car 140 Courtland St	LUST	870 feet west northwest	Side Gradient	N
13	Radisson Hotel Atlanta 165 Courtland St	LUST	950 feet northwest	Side Gradient	N
14	Ivy Street Co. Inc. Property 76-82 International Blvd.	LUST	950 feet northwest	Side Gradient	N
15	Greyhound Location 4109 81 International Blvd.	LUST	980 feet west northwest	Side Gradient	N
16	Peachtree Center Assemblage Tract 5, Parcel 28	Non-HSI	1,000 feet west	Up gradient	N

No.	Facility & Address	Program	Approximate distance & Direction	Hydraulic Relation	Potential Impact, Y/N
17	Hertz Rent A Car (former) 202 Courtland St	LUST, FINDS	1,100 feet northwest	Side Gradient	N
18	State Farm Insurance Co. Ser 202 Courtland St	Non-HSI	1,100 feet northwest	Side Gradient	N
19	Fulton County Dept of Public 101 Auburn Avenue	LUST	1,100 feet southwest	Down Gradient	N
20	160 Edgewood Ave.	Non-HSI	1,200 feet south southwest	Down Gradient	N
21	Rib Shack 302 Auburn Ave,	LUST	1,200 feet southeast	Down Gradient	N
22	System Parking, Inc. 293 Courtland St	Non-HSI	1,400 feet north northwest	Side Gradient	N
23	Highland Spalding Children's Hospital 35 Butler St	LUST	1,600 feet south	Side Gradient	N
24	Grady Homes 101 Hilliard Street	LUST	1,600 feet east southeast	Side Gradient	N
25	SunTrust Storage/Parking Facility Auburn Avenue NE, 18 Ivy St	Non-HSI	1,800 feet southwest	Side Gradient	N
26	Enterprise Leasing Co. 303 Courtland St NE	LUST	1,800 feet north northwest	Side Gradient	N
27	Atlanta City detention Ctr. 254 Peachtree St	Non-HSI	1,900 feet west northwest	Side Gradient	N
28	*Dobbs/Jackson Abandoned Drum, 399 John Wesley Dobbs*	*CERCLIS*	*1,900 feet northeast*	*Down Gradient*	*N*
29	*Prior Tire Co., 375 Highland Avenue*	*LUST*	*2,000 feet northeast*	*Down Gradient*	*N*
30	M & F Co. Property 237 Peachtree St	Non-HSI	2,000 feet west northwest	Side Gradient	N
31	Ga Power Co. 333 Piedmont Avenue	Non-HSI	2,000 feet north	Side Gradient	N
32	Ga State Univ. Property 70 Broad St.	Non-HSI	2,300 feet west southwest	Side Gradient	N
33	Ga Power 241 Ralf McGill Blvd	LUST	2,400 feet north northeast	Side Gradient	N
34	Easeway Food 400 Edgewood Ave NE	LUST	2,400 feet east southeast	Side Gradient	N
35	*229 Grant Street, 227229 Grant Street*	*HSI*	*3,000 feet southeast*	*Down Gradient*	*N*

6.2 Physical Setting Sources

The topography, geology and hydrogeology commonly control the migration of chemicals released at a site/facility. The relative location of the properties will often define their potential interaction and hydraulic connection. The description of the setting for the Project Site is provided below, starting with the topography and geology. The estimated surface water and groundwater flow directions are then estimated and described.

The Project Site is located in the Piedmont Physiographic Province of Georgia, which is characterized by medium- to high-grade metamorphic rocks and scattered igneous intrusions. Topography in the province is variable and ranges from gently rolling hills in the south to moderate to steep hills in the north. Based on the United States Geological Survey (USGS) 7.5-minute topographic quadrangle map of the area entitled Northwest Atlanta, Georgia, 1997, elevations in the vicinity of the Project Site range from approximately 980 feet above mean sea level (msl) to approximately 1,190 feet above msl. The Project Site was located in an area of rolling hills with an approximate elevation of 1,000 feet above msl. Topography at the Project Site generally slopes down to the east towards storm water catch basins located throughout the area. Surface water flow at the Project Site and immediate vicinity generally flows east. Figure 2 shows the topography of the Project Site and surrounding areas.

The metamorphic rocks comprising the Piedmont were formed when older "parent" rocks were subjected to high temperatures and/or pressures during regional metamorphism that occurred during the creation of the Appalachian Mountains. The same high temperatures and pressures also caused some "parent" rocks to fully melt and subsequently re-crystallize as intrusive igneous rocks. According to the *Geologic Map of Georgia,* the rock types underlying the Project Site have been mapped as granite, gneiss and amphibolite, which are highly metamorphosed rocks.

Groundwater in this region is contained in joints, fractures and other openings in bedrock and the pore spaces in the overlying residual soil. Groundwater recharge occurs by seepage of water through the soil and/or rock or by flowing directly into openings in outcropping rock. The primary source of recharge water is from precipitation that falls in the area, but can also originate from river discharge during dry periods. The movement of groundwater typically follows the original surface topography, moving from hilltops and uplands to stream valleys. The water table is generally 30 to 100 feet below the ground surface on hilltops and hillsides, but is at or near the ground surface in stream valleys and draws. In this type of geologic setting, the direction of groundwater flow can be anticipated to generally conform to that of the surface water.

Based on the USGS topographic map of the area, groundwater below the Project Site is anticipated to flow east. Areas considered up-gradient of the Project Site are to the within 2,000 feet of the Project Site to the west. This anticipated direction of groundwater flow was used to assist in the evaluation of potential impacts from nearby properties.

7.0 RECONNAISSANCE

7.1 Project Site Reconnaissance

7.1.1 Methodology and Limiting Conditions:

Our reconnaissance of the Project Site was performed on August 24, 2005. The reconnaissance was conducted to look for evidence of recognized environmental conditions at the Project Site. The reconnaissance consisted of an on-site, visual review by a representative from United Consulting: Mr. Alex B. Hallford, Project Environmental Specialist. The reconnaissance was performed by walking the perimeter boundaries of the Project Site and accessible portions of the interior of the Project Site. The Project Site had been cleared and was predominantly graded.

A site plan provided during the previous environmental assessments at the Project Site was used as a guide to locate the boundaries of the Project Site during the site reconnaissance.

7.1.2 Results:

The results of the reconnaissance are summarized in Table 3. Additional discussion is provided following Table 3 as appropriate. Photographs of the Project Site are included in Appendix C.

TABLE 3: SITE RECONNAISSANCE INFORMATION

ITEMS	APPLIC. (Yes/No)	DISCUSSION (blanks indicate items not observed on the Project Site)
Site Structures	No	
Property Use	No	The Project Site was vacant, clear, graded land.
Roads and Access	Yes	The Project Site was accessed via John Wesley Dobbs Avenue or Piedmont Avenue.
Easements	No	No visible power, gas, oil, or sewer easements were identified on the Project Site.
Drainage Ways	No	
Water	No	Municipal water service is likely available from the City of Atlanta.
Wells	Yes	Three groundwater monitoring wells were observed near John Wesley Dobbs Avenue, which were part of a previous groundwater pumping test.
Sewage	No	Municipal sewage service is likely available from the City of Atlanta.
Tanks	No	Discussed below.
Drums	No	
Other Containers	No	
Storage Areas	Yes	One storage shed was observed on the Project Site, which was being used for the storage of construction related materials.
Ponds and/or Pools of Liquid or Sludge	No	No ponds, pools, or lakes were located on the Project Site.
Grading	Yes	Grading was in progress at the Project Site.

ITEMS	APPLIC. (Yes/No)	DISCUSSION (blanks indicate items not observed on the Project Site)
Stained Soil or Pavement	No	No stained soil was observed. *De minimis* oil staining was noted in some isolated areas, which was associated with the ongoing grading operations and in the area of the asphalt paving.
Vegetation/Ground Cover	Yes	The Project Site was mainly exposed soils. A small area of asphalt remained on the western portion of the Project Site.
Solid Waste	No	No evidence of trash piles, land filling or burial operations was observed.
Odors	No	No unusual odors were noted on the Project Site at the time of the site reconnaissance.
Polychlorinated Biphenyls (PCBs)	No	Transformers or other equipment labeled as containing PCBs were not observed on the Project Site.
Drains and Sumps	No	

Tanks:
No features indicative of above ground storage tanks (ASTs) was observed on the Project Site. No features indicative of USTs, such as fill caps, vent pipes, pump islands, or associated piping were observed. However, USTs were previously present at the Project Site. The USTMP issued two NFA letters for the impacts associated with the USTs.

8.0 INTERVIEWS

During and following the site reconnaissance, interviews were conducted with persons familiar with the Project Site. These persons were questioned as to their knowledge of any past activities at the Project Site, which might present the potential for recognized environmental conditions. The interviews provided the following information. Copies of interview forms are included in Appendix D.

8.1 Property Owner

United Consulting provided a property questionnaire form to numerous representatives of the current owner of the Project Site, including Mr. Craig Pendergrast, Mr. John Marshall, and Mr. Mark Lawson. Based on their responses, they were not aware of any environmental liens or deed restrictions on the Project Site. They were not aware of RECs at the Project Site, by reason of the remediation documented in the VCSR. However, historically, they believed there were RECs. Reference was made to information in the previously referenced VCAP and VCSR. They were not aware of value reduction in the property in connection with its December 2002 acquisition by Piedmont/Ellis, LLC from Ford Motor Credit. However, in conjunction with that acquisition, an environmental insurance policy was issued for the Project Site at the request of Ford Motor Credit for the benefit of Piedmont/Ellis, LLC and others.

A representative of the Dennis Taylor and Grading Company (name not provided) was interviewed. The representative stated that the grading equipment located on the Project Site was fueled from a fuel truck and that no ASTs were present on the Project Site.

8.2 Local Government Officials

United Consulting contacted Chief Parker, the City of Atlanta Inspection Chief, with the City of Atlanta Fire Department to search the City of Atlanta's records for any incidents that have occurred at the Project Site. Chief Parker stated that the City of Atlanta had no records of any responses to the 141 Piedmont Avenue property for fires, chemical spills or environmental issues.

9.0 FINDINGS

The Project Site consisted of an approximate 4.15-acre tract of vacant graded land. The Project Site was in the process of being developed with student housing for Georgia State University. Historically, the Project Site was developed with a dry cleaning facility, a fueling facility and an automotive facility.

The Project Site was listed as a UST, LUST, and NON-HSI facility in the State environmental databases reviewed. Soil and groundwater impacts were previously reported to the USTMP and HSRP. The USTMP issued two NFA letters for the impacts associated with the USTs. In addition, for releases of PCE, the HSRP had issued two non-listing letters for either groundwater or soil impacts based upon the conditions existing with respect to the Site at the time of such letters. In United Consulting's opinion, the historical operations, soil and groundwater impacts, and regulatory status of the Project Site were and/or are RECs.

Thirty-four listed regulated facilities were identified within the prescribed search distances from the Project Site. In United Consulting's opinion, one of these facilities has likely impacted the Project Site at this time, BP No. 24023, current Shell Station. This was identified by the USTMP in an EPD letter dated December 3, 2003. In United Consulting's opinion, this facility is a REC.

As part of the Brownfields application under HSRRA, a VCAP was prepared and implemented, which included the collection of additional soil and groundwater data, and corrective action operations. Groundwater conditions were assessed near the property lines and interior to the Project Site and impacts from the above RECs were identified. Soil impacts were also identified. Corrective actions included the removal of about 8,000 tons of soils impacted with constituents at concentrations greater than their applicable residential RRS. A VCSR was then prepared with certified that the soils at the Project Site meet the applicable residential RRS. The EPD then issued a LoL for the Project Site, in a letter dated September 6, 2005.

10.0 OPINION

Based on the data collected at the site to date, soil and groundwater impacts exist at the Project Site, from both on and off-site sources. The adjacent Shell Station is a REC. Further, the historical operations and regulatory status of the Project Site are RECs. However, corrective actions have removed soils found on the Project Site with chemicals identified (CI) concentrations above residential RRS under the HSRP. Thus, with the approved Brownfield application, subsequent remedial actions, and the issuance of a LoL for the Project Site under HSRRA, in United Consulting's opinion, the Project Site is in compliance with the EPD requirements. . Therefore, in United Consulting's opinion, the RECs have been addressed, and no further actions are warranted at this time.

11.0 CONCLUSION

United Consulting has performed a Phase I Environmental Assessment Update for the Project Site in substantial conformance with the scope and limitations of ASTM Practice E 1527-00. This assessment has revealed evidence of RECs in connection with the Project Site. However, with site remediation and the EPDs issuance of a LoL for the Project Site, in United Consulting's opinion, the RECs have been addressed, and no further actions are warranted at this time.

12.0 DEVIATIONS

The Phase I Environmental Assessment Update was performed to substantially meet the requirements of ASTM for such investigations. The technical requirements of the ASTM standard, revised in the year 2000, were followed.

Our opinions assessed issues beyond strict liability under CERCLA, or Superfund. No substantial deviations or limiting conditions to the ASTM were made.

13.0 REFERENCES

The list of references used in this assessment is provided at the end of the document in Appendix E, in accordance with the ASTM standard. United Consulting's qualifications are summarized in Appendix F.

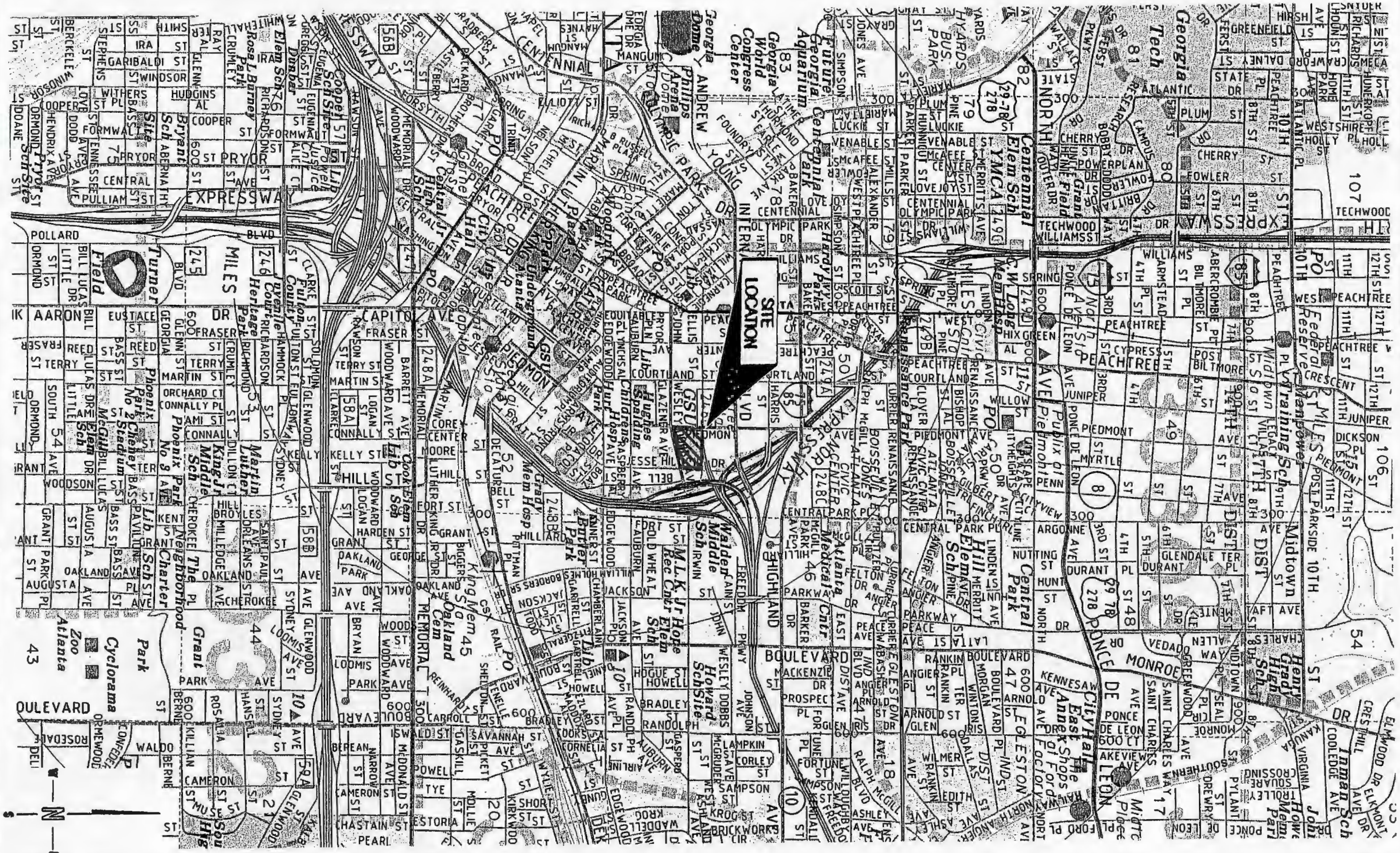
14.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

Signatures of the environmental professionals are included on the cover page for this Phase I Environmental Assessment.

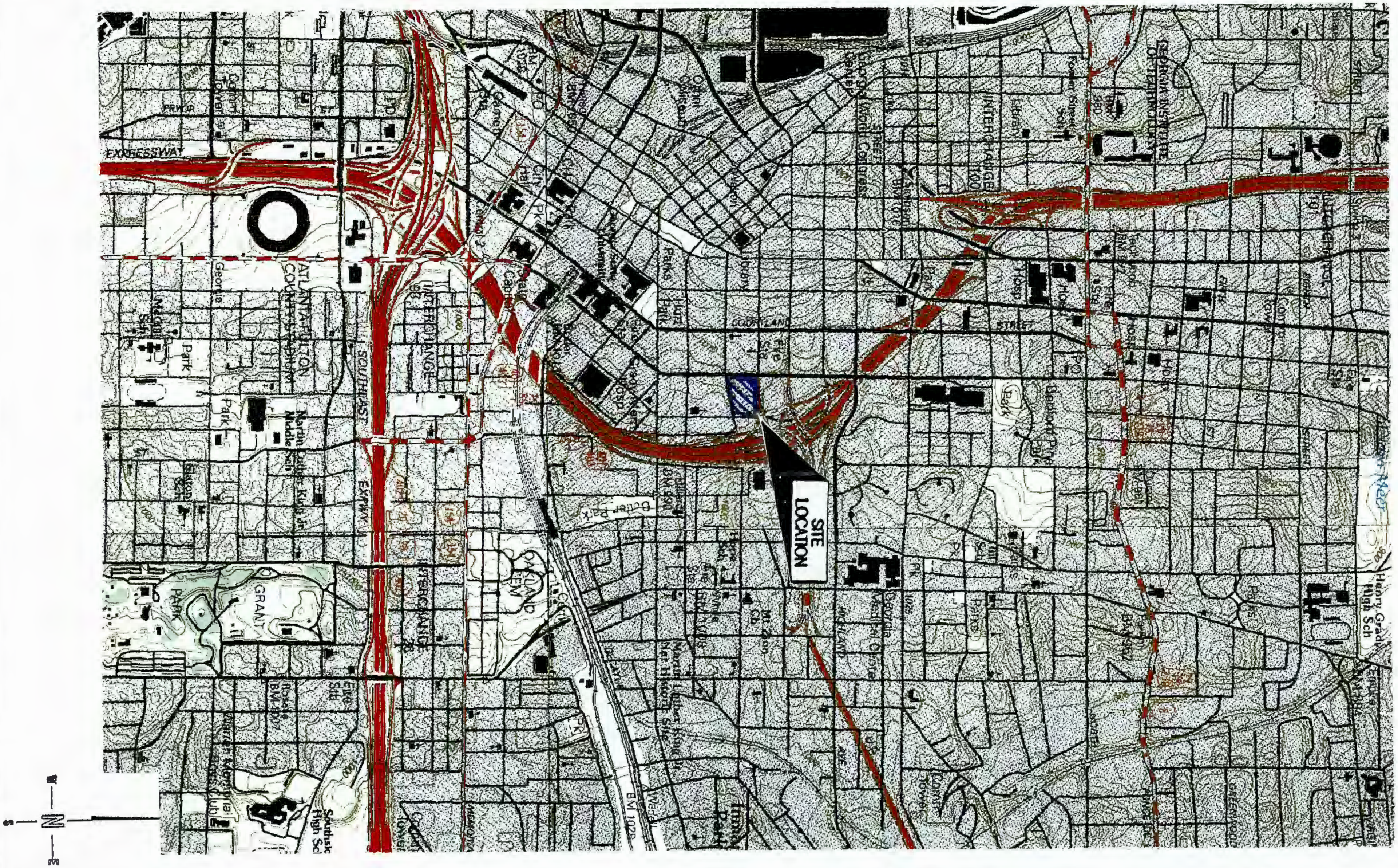
15.0 QUALIFICATIONS

United Consulting's qualifications are summarized in Appendix F.

UNITED CONSULTING



SCALE: 1"=2000'	DATE: 23-Aug-05	PROJECT NO: 2004.1249.15	TITLE: SITE LOCATION MAP GEORGIA STATE UNIVERSITY HOUSING	FIG. 1
PREPARED: ABH	CHECKED:	REVISIONS:		
CLIENT: SEYFARTH SHAW			UNITED CONSULTING 625 Holcomb Bridge Road, Norcross, GA	



SCALE: 1"=2000'	DATE: 23-Aug-05	PROJECT NO: 2004.1249.15	TITLE: USGS TOPOGRAPHIC MAP GEORGIA STATE UNIVERSITY HOUSING	FIG. 2
PREPARED: ABH	CHECKED:	REVISIONS:		
CLIENT: SEYFARTH SHAW			UNITED CONSULTING 625 Holcomb Bridge Road, Norcross, GA	

APPENDIX A – REGULATORY DATABASE RECORDS

The EDR Radius Map™ Report

Georgia State University Housing
141 Piedmont Avenue
Atlanta, GA 30308

Inquiry Number: 1492366.1s

August 22, 2005

The Standard in Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06460

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

FORM-BAS

TABLE OF CONTENTS

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property.
Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

FEDERAL ASTM STANDARD

CERCLIS: The Comprehensive Environmental Response, Compensation and Liability Information System contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).
CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

A review of the CERCLIS list, as provided by EDR, and dated 06/27/2005 has revealed that there is 1 CERCLIS site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
DOBBS/JACKSON ABANDONED DRUM	399 JOHN WESLEY DOBBS A	1/4 - 1/2E	31	46

RCRAInfo: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System(RCRIS). The database includes selective information on sites which generate, transport, store , treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month Large quantity generators generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

A review of the RCRA-SQG list, as provided by EDR, and dated 05/20/2005 has revealed that there is 1 RCRA-SQG site within approximately 0.25 miles of the target property.

Lower Elevation	Address	Dist / Dir	Map ID	Page
BEAUDRY FORD INC	***200 HOUSTON ST NE***	***0 - 1/8 ESE***	***3***	***10***

STATE ASTM STANDARD

SHWS: The State Hazardous Waste Sites records are the states' equivalent to CERCLIS. These sites

may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. The data come from the Department of Natural Resources' Hazardous Site Inventory.

A review of the SHWS list, as provided by EDR, has revealed that there are 3 SHWS sites within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
SCRIPTO PLANT & OFFICE COMPLEX	435 HOUSTON STREET	1/2 - 1 ESE	43	62
229 GRANT STREET	227-229 GRANT STREET	1/2 - 1 SSE	51	70
LARKIN COILS	***519 MEMORIAL DR***	***1/2 - 1 SE***	***73***	***75***

LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Natural Resources' Confirmed Release List.

A review of the LUST list, as provided by EDR, and dated 06/07/2005 has revealed that there are 17 LUST sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
HERTZ RENTAL CAR LOCATION (FOR	***157 HOUSTON ST NE***	***0 - 1/8 WSW***	***4***	***10***
FIRE STATION #4	***125 ELLIS ST NE***	***1/8 - 1/4 WNW***	***B6***	***13***
BUDGET RENT A CAR	***140 COURTLAND ST***	***1/8 - 1/4 WNW***	***D12***	***22***
AVIS RENT-A-CAR SYSTEM INC	***143 COURTLAND ST NE***	***1/8 - 1/4 WNW***	***D14***	***26***
RADISSON HOTEL ATLANTA	***165 CORTLAND ST***	***1/8 - 1/4 NW***	***C16***	***29***
FULTON COUNTY - DEPT OF PUBLIC	***101 AUBURN AVE NE***	***1/8 - 1/4 SW***	***19***	***32***
HERTZ RENT A CAR FORMER	***202 COURRAND ST***	***1/8 - 1/4 NW***	***E20***	***33***
EASEWAY FOOD	***400 EDGEWOOD AVE NE***	***1/4 - 1/2 SE***	***27***	***44***
ENTERPRISE LEASING CO	***303 COURTLAND ST NE***	***1/4 - 1/2 NNW***	***29***	***45***
GA POWER CO/GENERAL OFFICE	***270 PEACHTREE ST NE***	***1/4 - 1/2 NW***	***34***	***47***
PRIOR TIRE CO	***375 HIGHLAND AVE NE***	***1/4 - 1/2 ENE***	***37***	***58***

Lower Elevation	Address	Dist / Dir	Map ID	Page
FULTON COUNTY HEALTH DEPT	***99 BUTLER ST NE***	***1/8 - 1/4 SE***	***7***	***14***
OSCAR S HALL JR	***215 AUBURN AVE NE***	***1/8 - 1/4 SSE***	***8***	***16***
RIB SHACK	***302 AUBURN AVE***	***1/8 - 1/4 SE***	***22***	***38***
HUGH SPALDING CHILDRENS HOSPIT	***35 JESSIE HILL JR DR SE***	***1/4 - 1/2 S***	***24***	***42***
GRADY HOMES	***101 HILLIARD STREET***	***1/4 - 1/2 ESE***	***25***	***43***
GA POWER/GEN OFF-MAINT & OP	***241 RALPH MCGILL BLVD***	***1/4 - 1/2 NNE***	***36***	***51***

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Natural Resources' Underground Storage Tank Database.

A review of the UST list, as provided by EDR, and dated 01/21/2005 has revealed that there are 11 UST sites within approximately 0.25 miles of the target property.

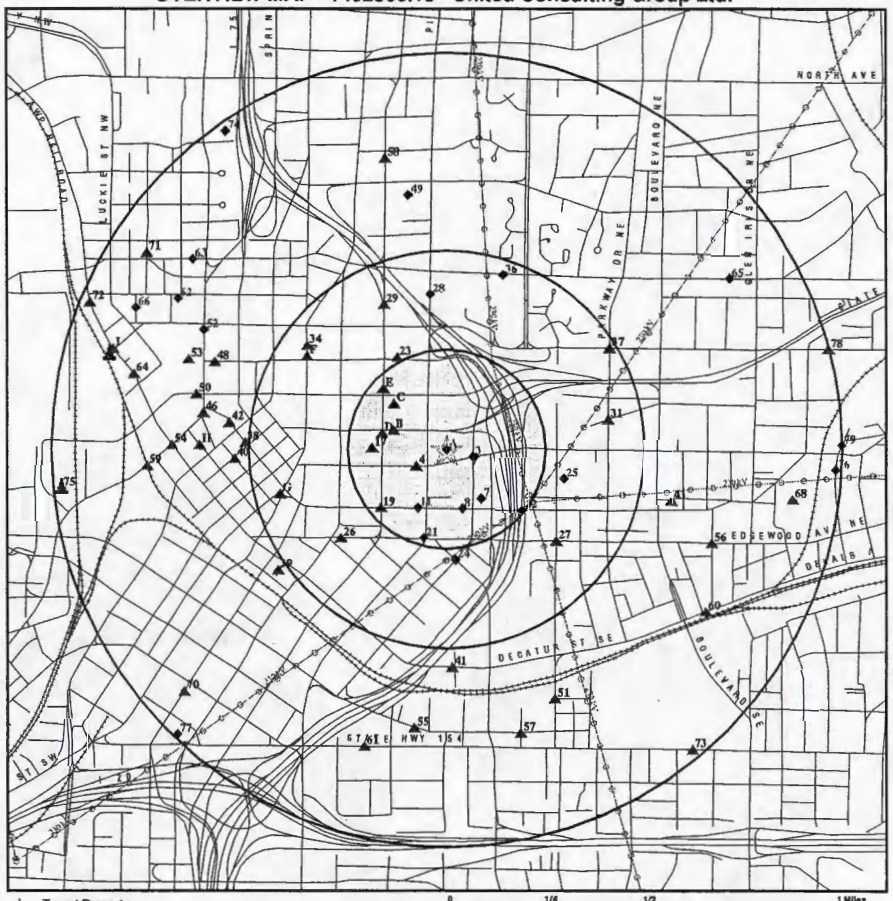
Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
HERTZ RENTAL CAR LOCATION (FOR	***157 HOUSTON ST NE***	***0 - 1/8 WSW***	***4***	***10***
WHITE ROSE	127 ELLIS ST	1/8 - 1/4 WNW	B5	12
FIRE STATION #4	***125 ELLIS ST NE***	***1/8 - 1/4 WNW***	***B6***	***13***
BUDGET RENT A CAR	140 COURTLAND ST	1/8 - 1/4 WNW	D13	22

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

Site Name	Database(s)
WOODALL CREEK SITE	SHWS
NORTH YARDS BUSINESS PARK	FINDS, LUST
CITY CENTER (UNDEVELOPED LAND)	LUST, UST
FORMER AUTOMOTIVE STATION	LUST
FEDERAL CENTER BUILDING SITE	LUST, UST
GEORGIA TECHNOLOGY SQUARE, BUILDING	LUST
IVY STREET CO INC PROPERTY	LUST, UST
GREYHOUND LOCATION 4109	FINDS, LUST, UST
AT&T	FINDS, LUST, UST
BST/BELLSOUTH CTR/F5142	LUST, UST
GA STATE UNIVERSITY FOUNDATION R	LUST, UST
FORMER ROY LIVINGSTON FILLING STATION	LUST, UST
PEACHTREE 400	UST
BELLSOUTH-COURTLAND-F1145	UST
GEORGIA STATE UNIVERSITY	FINDS, UST
GEORGIA TECHNOLOGY SQUARE, BUILDING D CONSTRUCTION	UST
CONSTRUCTION SITE-FUTURE GEORGIA BAPTIST HOSPITAL	UST
BELLSOUTH TELECOMMUNICATIONS	RCRA-SQG, FINDS
A T & T ELLISVILLE FLORIDA POWER FEED	RCRA-SQG, FINDS
TRI STATE MOTOR TRANSIT	GA Spills
GEORGIA TECH	GA Spills
GEORGIA POWER	GA Spills
GEORGIA POWER	GA Spills
GEORGIA POWER	GA Spills
GEORGIA POWER	GA Spills
GEORGIA POWER CO	GA Spills
GEORGIA POWER CO	GA Spills
GEORGIA POWER	GA Spills
GEORGIA POWER	GA Spills
GEORGIA POWER COMPANY	GA Spills
SPRING STREET AND I-75/85 PROPERTY	GA NON-HSI
GWCC (TRACT I)	GA NON-HSI
GWCC (TRACT II)	GA NON-HSI
CORNER LOT, PEACHTREE RD & PIEDMONT	GA NON-HSI
GA STATE UNIVERSITY PARKING LOTS J&	GA NON-HSI
25 PIEDMONT AVENUE	GA NON-HSI
275 MT. VERNON HIGHWAY NE	GA NON-HSI

OVERVIEW MAP - 1492366.1s - United Consulting Group Ltd.



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Coal Gasification Sites
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Power transmission lines
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone

TARGET PROPERTY:	Georgia State University Housing	CUSTOMER:	United Consulting Group Ltd.
ADDRESS:	141 Piedmont Avenue	CONTACT:	Alex Hallford
CITY/STATE/ZIP:	Atlanta GA 30308	INQUIRY #:	1492366.1s
LAT/LONG:	33.7577 / 84.3814	DATE:	August 22, 2005 8:22 am

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
EDR PROPRIETARY HISTORICAL DATABASES								
Coal Gas		1.000	0	0	0	2	NR	2
BROWNFIELDS DATABASES								
US BROWNFIELDS		0.500	0	0	0	NR	NR	0
US INST CONTROL		0.500	0	0	0	NR	NR	0
BROWNFIELDS		0.500	0	0	0	NR	NR	0
INST CONTROL		0.500	0	0	0	NR	NR	0

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

Map ID / Direction / Distance / Distance (ft.) / Elevation | Site | Database(s) | EDR ID Number / EPA ID Number

A1
Target Property
BEAUDRY FORD
141 PIEDMONT ROAD
ATLANTA, GA

GA NON-HSI **1006780965** **N/A**

Site 1 of 2 in cluster A

Actual: 998 ft.

Non-HSI:

Latitude/Longitude:	33.75694 / 84.38000
Ground Water Pathway Score:	Not reported
On-Site Pathway Score:	Not reported
Report Date:	12/03/02
Contaminants:	tetrachloroethene

A2
Target Property
BEAUDRY FORD INC
141 PIEDMONT AVE NE
ATLANTA, GA 30303

LUST **U001476374**
UST **N/A**

Site 2 of 2 in cluster A

Actual: 998 ft.

LUST:

Facility ID:	00600617
Leak ID:	1
Date Received:	11/04/03
Project Officer:	Wallace,Ronald J
Description:	Confirmed Release Received

UST:

Facility ID:	600617
Total Tanks:	4
Tank ID:	1
Material:	Marked Unknown
Capacity:	2005
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	BEAUDRY FORD INC 141 PIEDMONT AVE NE ATLANTA, GA 30303
Owner Phone	404-659-3673
Product:	Other
Status:	Installed
Status Date:	04/20/68
Pipe Type :	Not Marked
Pipe Material:	Galvanized Steel

Facility ID:	600617
Total Tanks:	4
Tank ID:	1
Material:	Marked Unknown
Capacity:	2005
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	BEAUDRY FORD INC 141 PIEDMONT AVE NE ATLANTA, GA 30303
Owner Phone	404-659-3673
Product:	Other

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number

BEAUDRY FORD INC (Continued) U001478374

Status: Removed From Ground Date Unknown
Status Date: / /
Pipe Type : Not Marked
Pipe Material: Not Marked

Facility ID: 600617
Total Tanks: 4
Tank ID: 3
Material: Marked Unknown
Capacity: 1000
Overfill Protection: Yes
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Yes
Owner: BEAUDRY FORD INC
141 PIEDMONT AVE NE
ATLANTA, GA 30303
Owner Phone 404-659-3673
Product: Used Oil
Status: Upgrade Repair Not Marked
Status Date: / /
Pipe Type : Not Marked
Pipe Material: Not Marked

Facility ID: 600617
Total Tanks: 4
Tank ID: 4
Material: Marked Unknown
Capacity: 1000
Overfill Protection: Yes
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Yes
Owner: BEAUDRY FORD INC
141 PIEDMONT AVE NE
ATLANTA, GA 30303
Owner Phone 404-659-3673
Product: Used Oil
Status: Installed
Status Date: 04/20/88
Pipe Type : Not Marked
Pipe Material: Not Marked

Facility ID: 600617
Total Tanks: 4
Tank ID: 4
Material: Marked Unknown
Capacity: 1000
Overfill Protection: Yes
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Yes
Owner: BEAUDRY FORD INC
141 PIEDMONT AVE NE
ATLANTA, GA 30303
Owner Phone 404-659-3673
Product: Used Oil

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number

BEAUDRY FORD INC (Continued) U001478374

Status: Removed From Ground Date Unknown
Status Date: / /
Pipe Type : Not Marked
Pipe Material: Not Marked

Facility ID: 600617
Total Tanks: 4
Tank ID: 4
Material: Marked Unknown
Capacity: 1000
Overfill Protection: Yes
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Yes
Owner: BEAUDRY FORD INC
141 PIEDMONT AVE NE
ATLANTA, GA 30303
Owner Phone 404-659-3673
Product: Used Oil
Status: Upgrade Repair Not Marked
Status Date: / /
Pipe Type : Not Marked
Pipe Material: Not Marked

---

3 **BEAUDRY FORD INC** RCRA-SQG 1000424448
ESE **200 HOUSTON ST NE** FINDS GAD981224470
< 1/8 **ATLANTA, GA 30303**
364 ft.

Relative: **Lower**

Actual: **978 ft.**

RCRAInfo:
Owner: HARMON BORN
(404) 659-3673
EPA ID: GAD981224470
Contact: HARMON BORN
(404) 659-3673
Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

---

4 **HERTZ RENTAL CAR LOCATION (FORME** LUST 1006785179
WSW **157 HOUSTON ST NE** UST N/A
< 1/8 **ATLANTA, GA 30303**
452 ft.

Relative: **Higher**

Actual: **1004 ft.**

LUST:
Facility ID: 09060008
Leak ID: 1
Date Received: 03/14/91
Project Officer: Manning,Darnell
Description: Confirmed Release Received

UST:
Facility ID: 9060008

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
	WHITE ROSE (Continued)		**U003984378**
	Status: Upgrade Repair Not Marked Status Date: Not reported Pipe Type : Not Marked Pipe Material: Not Marked		
B6 **WNW** **1/8-1/4** **755 ft.** **Relative:** **Higher** **Actual:** **1022 ft.**	**FIRE STATION #4** **125 ELLIS ST NE** **ATLANTA, GA 30303** **Site 2 of 2 in cluster B**	**LUST** **UST**	**U001478180** **N/A**
	LUST: Facility ID: 00600365 Leak ID: 1 Date Received: 05/21/99 Project Officer: Humphris,David D Description: Confirmed Release Received		
	UST: Facility ID: 600365 Total Tanks: 1 Tank ID: 1 Material: Bare Steel Capacity: 1000 Overfill Protection: Spill Date : Not reported Overfill Installed : Not reported Tank Exempt From Spill : Not reported Owner: CITY OF ATLANTA 23 CLAIRE DR ATLANTA, GA 30315 Owner Phone 404-622-7681 Product: Diesel Status: Installed Status Date: 05/14/60 Pipe Type : Not Marked Pipe Material: Galvanized Steel		
	Facility ID: 600365 Total Tanks: 1 Tank ID: 1 Material: Bare Steel Capacity: 1000 Overfill Protection: Spill Date : Not reported Overfill Installed : Not reported Tank Exempt From Spill : Not reported Owner: CITY OF ATLANTA 23 CLAIRE DR ATLANTA, GA 30315 Owner Phone 404-622-7681 Product: Diesel Status: Removed From Ground Status Date: 11/01/98 Pipe Type : Not Marked Pipe Material: Galvanized Steel		
	Facility ID: 600365 Total Tanks: 1		

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
	FIRE STATION #4 (Continued)		**U001478180**
	Tank ID: 1 Material: Bare Steel Capacity: 1000 Overfill Protection: Spill Date : Not reported Overfill Installed : Not reported Tank Exempt From Spill : Not reported Owner: CITY OF ATLANTA 23 CLAIRE DR ATLANTA, GA 30315 Owner Phone 404-622-7681 Product: Diesel Status: Upgrade Repair Not Marked Status Date: / / Pipe Type : Not Marked Pipe Material: Galvanized Steel		
7 **SE** **1/8-1/4** **800 ft.** **Relative:** **Lower** **Actual:** **975 ft.**	**FULTON COUNTY HEALTH DEPT** **99 BUTLER ST NE** **ATLANTA, GA 30303**	**LUST** **UST**	**U001478148** **N/A**
	LUST: Facility ID: 00600317 Leak ID: 1 Date Received: 11/21/97 Project Officer: McAllister,Amy J Description: Confirmed Release Received		
	UST: Facility ID: 600317 Total Tanks: 2 Tank ID: 1 Material: Bare Steel Capacity: 1000 Overfill Protection: Spill Date : / / Overfill Installed : / / Tank Exempt From Spill : Not reported Owner: FULTON COUNTY - DEPARTMENT OF PUBLIC 3977 AVIATION BLVD ATLANTA, GA 30336 Owner Phone 404-505-5730 Product: Gas Status: Installed Status Date: 05/13/66 Pipe Type : Suction: No Valve At The Tank Pipe Material: Galvanized Steel		
	Facility ID: 600317 Total Tanks: 2 Tank ID: 1 Material: Bare Steel Capacity: 1000 Overfill Protection: Spill Date : / / Overfill Installed : / / Tank Exempt From Spill : Not reported Owner: FULTON COUNTY - DEPARTMENT OF PUBLIC		

OSCAR S HALL JR (Continued) U001477974

Owner Phone	404-659-9067
Product:	Gas
Status:	Installed
Status Date:	5/12/1959
Pipe Type :	Not Marked
Pipe Material:	Galvanized Steel
Facility ID:	600079
Total Tanks:	5
Tank ID:	1
Material:	Bare Steel
Capacity:	5000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	OSCAR S HALL JR 215 AUBURN AVE NE ATLANTA, GA 30303
Owner Phone	404-659-9067
Product:	Gas
Status:	Removed From Ground
Status Date:	4/17/1995
Pipe Type :	Not Marked
Pipe Material:	Galvanized Steel
Facility ID:	600079
Total Tanks:	5
Tank ID:	1
Material:	Bare Steel
Capacity:	5000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	OSCAR S HALL JR 215 AUBURN AVE NE ATLANTA, GA 30303
Owner Phone	404-659-9067
Product:	Gas
Status:	Upgrade Repair Not Marked
Status Date:	Not reported
Pipe Type :	Not Marked
Pipe Material:	Galvanized Steel
Facility ID:	600079
Total Tanks:	5
Tank ID:	2
Material:	Bare Steel
Capacity:	5000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	OSCAR S HALL JR 215 AUBURN AVE NE ATLANTA, GA 30303

OSCAR S HALL JR (Continued) U001477974

Owner Phone	404-659-9067
Product:	Gas
Status:	Installed
Status Date:	5/12/1959
Pipe Type :	Not Marked
Pipe Material:	Galvanized Steel
Facility ID:	600079
Total Tanks:	5
Tank ID:	2
Material:	Bare Steel
Capacity:	5000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	OSCAR S HALL JR 215 AUBURN AVE NE ATLANTA, GA 30303
Owner Phone	404-659-9067
Product:	Gas
Status:	Removed From Ground
Status Date:	4/17/1995
Pipe Type :	Not Marked
Pipe Material:	Galvanized Steel
Facility ID:	600079
Total Tanks:	5
Tank ID:	2
Material:	Bare Steel
Capacity:	5000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	OSCAR S HALL JR 215 AUBURN AVE NE ATLANTA, GA 30303
Owner Phone	404-659-9067
Product:	Gas
Status:	Upgrade Repair Not Marked
Status Date:	Not reported
Pipe Type :	Not Marked
Pipe Material:	Galvanized Steel
Facility ID:	600079
Total Tanks:	5
Tank ID:	3
Material:	Bare Steel
Capacity:	550
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	OSCAR S HALL JR 215 AUBURN AVE NE ATLANTA, GA 30303

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
	OSCAR S HALL JR (Continued)		U001477974
	Owner Phone: 404-659-9067 Product: Gas Status: Installed Status Date: Not reported Pipe Type : Not Marked Pipe Material: Unknown Facility ID: 600079 Total Tanks: 5 Tank ID: 5 Material: Not Marked/Unknown Capacity: 10000 Overfill Protection: Spill Date : Not reported Overfill Installed : Not reported Tank Exempt From Spill : Not reported Owner: OSCAR S HALL JR 215 AUBURN AVE NE ATLANTA, GA 30303 Owner Phone 404-659-9067 Product: Gas Status: Removed From Ground Status Data: 4/17/1995 Pipe Type : Not Marked Pipe Material: Unknown Facility ID: 600079 Total Tanks: 5 Tank ID: 5 Material: Not Marked/Unknown Capacity: 10000 Overfill Protection: Spill Date : Not reported Overfill Installed : Not reported Tank Exempt From Spill : Not reported Owner: OSCAR S HALL JR 215 AUBURN AVE NE ATLANTA, GA 30303 Owner Phone 404-659-9067 Product: Gas Status: Upgrade Repair Not Marked Status Date: Not reported Pipe Type : Not Marked Pipe Material: Unknown		
C9 NW 1/8-1/4 851 ft. Relative: Higher Actual: 1011 ft.	**CHAVEZ DOWNTOWN PROPERTIES** **INTERNATIONAL @ COURTLAND @ ELLIS** **ATLANTA, GA 30302** **Site 1 of 3 in cluster C** Non-HSI: Latitude/Longitude: 0.00000 / 0.00000 Ground Water Pathway Score: 4.1 On-Site Pathway Score: 19.3 Report Date: / / Contaminants: Not reported	GA NON-HSI	S103439776 N/A

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
C10 NW 1/8-1/4 861 ft. Relative: Higher Actual: 1013 ft.	**BANK OF NOVA SCOTIA SITE** **INTERNATIONAL BLVD. / COURTLAND ST.** **ATLANTA, GA** **Site 2 of 3 in cluster C** Non-HSI: Latitude/Longitude: 0.00000 / 0.00000 Ground Water Pathway Score: Not reported On-Site Pathway Score: Not reported Report Date: 01/01/00 Contaminants: Not reported	GA NON-HSI	S104819364 N/A
11 SSW 1/8-1/4 864 ft. Relative: Lower Actual: 992 ft.	**159-215 AUBURN AVENUE** **159-215 AUBURN AVENUE** **ATLANTA, GA** Non-HSI: Latitude/Longitude: 33.75583 / 84.38000 Ground Water Pathway Score: Not reported On-Site Pathway Score: Not reported Report Date: 08/04/04 Contaminants: lead	GA NON-HSI	S106678160 N/A
D12 WNW 1/8-1/4 881 ft. Relative: Higher Actual: 1025 ft.	**BUDGET RENT A CAR** **140 COURTLAND ST** **ATLANTA, GA 30303** **Site 1 of 4 in cluster D** FINDS: Other Pertinent Environmental Activity Identified at Site: GEORGIA-GEOGRAPHIC ENVIRONMENTAL INFORMATION MANAGEMENT SYSTEM LUST: Facility ID: 00601168 Leak ID: 1 Date Received: 01/10/94 Project Officer: Huddleston,Paul Description: Confirmed Release Received Facility ID: 00601168 Leak ID: 2 Date Received: 04/13/04 Project Officer: Brown,James W Description: Suspected Release Received	FINDS LUST	1006783427 110013528049
D13 WNW 1/8-1/4 881 ft. Relative: Higher Actual: 1025 ft.	**BUDGET RENT A CAR** **140 COURTLAND ST** **ATLANTA, GA 30303** **Site 2 of 4 in cluster D** UST: Facility ID: 601168 Total Tanks: 3 Tank ID: 1	UST	U001478803 N/A

BUDGET RENT A CAR (Continued) U001478803

Material: Steel-Impressed Current
Capacity: 6100
Overfill Protection:
Spill Date : 07/28/98
Overfill Installed : 07/28/98
Tank Exempt From Spill : Not reported
Owner: BUDGET RENT-A-CAR
1110 NORTHCHASE PKWY SE 200
MARIETTA, GA 30067
Owner Phone 770-240-3315
Product: Gas
Status: Installed
Status Date: 02/25/71
Pipe Type : Suction: Valve At The Tank
Pipe Material: Cathodicelly Protected

Facility ID: 601168
Total Tanks: 3
Tank ID: 2
Material: Steel-Impressed Current
Capacity: 6100
Overfill Protection:
Spill Date : 07/28/98
Overfill Installed : 07/28/98
Tank Exempt From Spill : Not reported
Owner: BUDGET RENT-A-CAR
1110 NORTHCHASE PKWY SE 200
MARIETTA, GA 30067
Owner Phone 770-240-3315
Product: Gas
Status: Currently In Use
Status Date: / /
Pipe Type : Suction: Valve At The Tank
Pipe Material: Cathodically Protected

Facility ID: 601168
Total Tanks: 3
Tank ID: 2
Material: Steel-Impressed Current
Capacity: 6100
Overfill Protection:
Spill Date : 07/28/98
Overfill Installed : 07/28/98
Tank Exempt From Spill : Not reported
Owner: BUDGET RENT-A-CAR
1110 NORTHCHASE PKWY SE 200
MARIETTA, GA 30067
Owner Phone 770-240-3315
Product: Gas
Status: Cathodically Prot
Status Date: 07/28/98
Pipe Type : Suction: Valve At The Tank
Pipe Material: Cathodically Protected

D14 **AVIS RENT-A-CAR SYSTEM INC** FINDS 1006789008
WNW **143 COURTLAND ST NE** LUST 110013584228
1/8-1/4 **ATLANTA, GA 30303**
882 ft.

Site 3 of 4 in cluster D

Relative:
Higher

FINDS:
Other Pertinent Environmental Activity Identified at Site:
GEORGIA-GEOGRAPHIC ENVIRONMENTAL INFORMATION MANAGEMENT SYSTEM

Actual:
1025 ft.

LUST:
Facility ID: 09000040
Leak ID: 1
Date Received: 04/02/86
Project Officer: Jones,F. Calvin
Description: Confirmed Release Received

D15 **AVIS RENT-A-CAR SYSTEM INC** UST U003004094
WNW **143 COURTLAND ST NE** N/A
1/8-1/4 **ATLANTA, GA 30303**
886 ft.

Site 4 of 4 in cluster D

Relative:
Higher

UST:
Facility ID: 9000040
Total Tanks: 3
Tank ID: 1
Material: Double Walled
Capacity: 12000
Overfill Protection:
Spill Date : 12/12/97
Overfill Installed : 12/12/97
Tank Exempt From Spill : Not reported
Owner: AVIS RENT A CAR SYSTEM INC
6 SYLVAN WY DEPT 29-093-36
PARSIPPANY, NJ 07054
Owner Phone 973-496-3467
Product: Gas
Status: Currently In Use
Status Date: / /
Pipe Type : Pressure
Pipe Material: Fiberglass Reinforced Plastic

Actual:
1025 ft.

Facility ID: 9000040
Total Tanks: 3
Tank ID: 1
Material: Double Walled
Capacity: 12000
Overfill Protection:
Spill Date : 12/12/97
Overfill Installed : 12/12/97
Tank Exempt From Spill : Not reported
Owner: AVIS RENT A CAR SYSTEM INC
6 SYLVAN WY DEPT 29-093-36
PARSIPPANY, NJ 07054
Owner Phone 973-496-3467
Product: Gas
Status: Upgrade Repair Not Marked
Status Date: / /
Pipe Type : Pressure
Pipe Material: Fiberglass Reinforced Plastic

AVIS RENT-A-CAR SYSTEM INC (Continued) U003004094

Facility ID:	9000040
Total Tanks:	3
Tank ID:	3
Material:	Bare Steel
Capacity:	550
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AVIS RENT A CAR SYSTEM INC 6 SYLVAN WY DEPT 29-093-36 PARSIPPANY, NJ 07054
Owner Phone	973-496-3467
Product:	Other
Status:	Upgrade Repair Not Marked
Status Date:	Not reported
Pipe Type :	Not Marked
Pipe Material:	Unknown

C16 **RADISSON HOTEL ATLANTA** LUST U003002327
NW **165 CORTLAND ST** UST N/A
1/8-1/4 **ATLANTA, GA 30303**
930 ft.

Site 3 of 3 in cluster C

Relative:
Higher

Actual:
1008 ft.

LUST:

Facility ID:	00600116
Leak ID:	1
Date Received:	03/01/99
Project Officer:	Logan,William E.
Description:	Confirmed Release Received

UST:

Facility ID:	600116
Total Tanks:	2
Tank ID:	2
Material:	Double Walled
Capacity:	6000
Overfill Protection:	
Spill Date :	09/28/94
Overfill Installed :	09/28/94
Tank Exempt From Spill :	Not reported
Owner:	RADISSON HOTEL ATLANTA 165 COURTLAND ATLANTA, GA 30303
Owner Phone	404-659-6500
Product:	Diesel
Status:	Installed
Status Date:	09/28/94
Pipe Type :	Suction: Valve At The Tank
Pipe Material:	Fiberglass Reinforced Plastic

Facility ID:	600116
Total Tanks:	2
Tank ID:	2
Material:	Double Walled
Capacity:	6000
Overfill Protection:	

RADISSON HOTEL ATLANTA (Continued) U003002327

Spill Date :	09/28/94
Overfill Installed :	09/28/94
Tank Exempt From Spill :	Not reported
Owner:	RADISSON HOTEL ATLANTA 165 COURTLAND ATLANTA, GA 30303
Owner Phone	404-659-6500
Product:	Diesel
Status:	Currently In Use
Status Date:	/ /
Pipe Type :	Suction: Valve At The Tank
Pipe Material:	Fiberglass Reinforced Plastic

Facility ID:	600116
Total Tanks:	2
Tank ID:	2
Material:	Double Walled
Capacity:	6000
Overfill Protection:	
Spill Date :	09/28/94
Overfill Installed :	09/28/94
Tank Exempt From Spill :	Not reported
Owner:	RADISSON HOTEL ATLANTA 165 COURTLAND ATLANTA, GA 30303
Owner Phone	404-659-6500
Product:	Diesel
Status:	Upgrade Repair Not Marked
Status Date:	/ /
Pipe Type :	Suction: Valve At The Tank
Pipe Material:	Fiberglass Reinforced Plastic

Facility ID:	600116
Total Tanks:	2
Tank ID:	1
Material:	Bare Steel
Capacity:	20000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	RADISSON HOTEL ATLANTA 165 COURTLAND ATLANTA, GA 30303
Owner Phone	404-659-6500
Product:	Heating Oil
Status:	Installed
Status Date:	2/11/1966
Pipe Type :	Not Marked
Pipe Material:	Bare Steel

Facility ID:	600116
Total Tanks:	2
Tank ID:	1
Material:	Bare Steel
Capacity:	20000
Overfill Protection:	

FULTON COUNTY - DEPT OF PUBLIC B (Continued) U003728330

Owner: FULTON COUNTY - DEPARTMENT OF PUBLIC
3977 AVIATION BLVD
ATLANTA, GA 30336
Owner Phone 404-505-5730
Product: Diesel
Status: Upgrade Repair Not Marked
Status Data: / /
Pipe Type : Not Marked
Pipe Material: Not Marked

E20 NW 1/8-1/4 1172 ft. Relative: Higher Actual: 1014 ft.

HERTZ RENT A CAR FORMER FINDS 1006780884
202 COURRAND ST LUST 110013502469
ATLANTA, GA 30303 UST

Site 2 of 2 in cluster E

FINDS:
Other Pertinent Environmental Activity Identified at Site:
GEORGIA-GEOGRAPHIC ENVIRONMENTAL INFORMATION MANAGEMENT SYSTEM

LUST:
Facility ID: 00600021
Leak ID: 1
Date Received: 01/14/91
Project Officer: Heard,Tracey
Description: Confirmed Release Received

Facility ID: 00600021
Leak ID: 2
Date Received: 10/08/03
Project Officer: Wallace,Ronald J
Description: Confirmed Release Received

UST:
Facility ID: 600021
Total Tanks: 5
Tank ID: 4
Material: Double Walled
Capacity: 10000
Overfill Protection:
Spill Date : / /
Overfill Installed : / /
Tank Exempt From Spill : Not reported
Owner: HERTZ CORPORATION
225 BRAE BLVD
PARK RIDGE, NJ 07656
Owner Phone 201-307-2423
Product: Gas
Status: Installed
Status Date: 04/01/90
Pipe Type : Suction: No Valve At The Tank
Pipe Material: Fiberglass Reinforced Plastic

Facility ID: 600021
Total Tanks: 5
Tank ID: 4
Material: Double Walled
Capacity: 10000
Overfill Protection:
Spill Date : / /

HERTZ RENT A CAR FORMER (Continued) 1006780884

Overfill Installed : / /
Tank Exempt From Spill : Not reported
Owner: HERTZ CORPORATION
225 BRAE BLVD
PARK RIDGE, NJ 07656
Owner Phone 201-307-2423
Product: Gas
Status: Removed From Ground
Status Date: 12/01/93
Pipe Type : Suction: No Valve At The Tank
Pipe Material: Fiberglass Reinforced Plastic

Facility ID: 600021
Total Tanks: 5
Tank ID: 4
Material: Double Walled
Capacity: 10000
Overfill Protection:
Spill Date : / /
Overfill Installed : / /
Tank Exempt From Spill : Not reported
Owner: HERTZ CORPORATION
225 BRAE BLVD
PARK RIDGE, NJ 07656
Owner Phone 201-307-2423
Product: Gas
Status: Upgrade Repair Not Marked
Status Date: / /
Pipe Type : Suction: No Valve At The Tank
Pipe Material: Fiberglass Reinforced Plastic

Facility ID: 600021
Total Tanks: 5
Tank ID: 1
Material: Bare Steel
Capacity: 8000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: HERTZ CORPORATION
225 BRAE BLVD
PARK RIDGE, NJ 07656
Owner Phone 201-307-2423
Product: Gas
Status: Installed
Status Date: 05/25/66
Pipe Type : Not Marked
Pipe Material: Unknown

Facility ID: 600021
Total Tanks: 5
Tank ID: 1
Material: Bare Steel
Capacity: 8000
Overfill Protection:
Spill Date : Not reported

Map ID / Direction / Distance / Distance (ft.) / Elevation | Site | Database(s) | EDR ID Number / EPA ID Number

HERTZ RENT A CAR FORMER (Continued) 1006780884

Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: HERTZ CORPORATION
225 BRAE BLVD
PARK RIDGE, NJ 07656
Owner Phone 201-307-2423
Product: Gas
Status: Removed From Ground
Status Date: 01/01/91
Pipe Type : Not Marked
Pipe Material: Unknown

Facility ID: 600021
Total Tanks: 5
Tank ID: 3
Material: Bare Steel
Capacity: 2000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: HERTZ CORPORATION
225 BRAE BLVD
PARK RIDGE, NJ 07656
Owner Phone 201-307-2423
Product: Gas
Status: Upgrade Repair Not Marked
Status Date: / /
Pipe Type : Not Marked
Pipe Material: Unknown

Facility ID: 600021
Total Tanks: 5
Tank ID: 5
Material: Not Marked/Unknown
Capacity: 1000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: HERTZ CORPORATION
225 BRAE BLVD
PARK RIDGE, NJ 07656
Owner Phone 201-307-2423
Product: Other
Status: Installed
Status Date: / /
Pipe Type : Not Marked
Pipe Material: Unknown

Facility ID: 600021
Total Tanks: 5
Tank ID: 5
Material: Not Marked/Unknown
Capacity: 1000
Overfill Protection:
Spill Date : Not reported

Map ID / Direction / Distance / Distance (ft.) / Elevation | Site | Database(s) | EDR ID Number / EPA ID Number

HERTZ RENT A CAR FORMER (Continued) 1006780884

Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: HERTZ CORPORATION
225 BRAE BLVD
PARK RIDGE, NJ 07656
Owner Phone 201-307-2423
Product: Other
Status: Currently In Use
Status Date: / /
Pipe Type : Not Marked
Pipe Material: Unknown

Facility ID: 600021
Total Tanks: 5
Tank ID: 5
Material: Not Marked/Unknown
Capacity: 1000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: HERTZ CORPORATION
225 BRAE BLVD
PARK RIDGE, NJ 07656
Owner Phone 201-307-2423
Product: Other
Status: Removed From Ground Date Unknown
Status Date: / /
Pipe Type : Not Marked
Pipe Material: Unknown

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21 **160 EDGEWOOD AVE. (FFC PARTNERSHIP** GA NON-HSI S105872201
SSW **160 EDGEWOOD AVENUE** N/A
1/8-1/4 **ATLANTA, GA**
1213 ft.

Relative: **Lower**
Actual: **992 ft.**

Non-HSI:
Latitude/Longitude: 33.75500 / 84.38194
Ground Water Pathway Score: Not reported
On-Site Pathway Score: Not reported
Report Date: 10/02/02
Contaminants: vinyl chloride, tetrachloroethene

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22 **RIB SHACK** LUST U003006038
SE **302 AUBURN AVE** UST N/A
1/8-1/4 **ATLANTA, GA 30303**
1293 ft.

Relative: **Lower**
Actual: **990 ft.**

LUST:
Facility ID: 09060449
Leak ID: 1
Date Received: 07/26/95
Project Officer: Gu,Chifeng
Description: Confirmed Release Received

UST:
Facility ID: 9060449
Total Tanks: 3

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
	RIB SHACK (Continued)		**U003006038**

Tank ID: 1
Material: Marked Unknown
Capacity: 1000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: INTOWN INVESTMENTS INC
2760 LENNONX RD
ATLANTA, GA 30324
Owner Phone 404-233-9241
Product: Other
Status: Installed
Status Date: Not reported
Pipe Type : Not Marked
Pipe Material: Unknown

Facility ID: 9060449
Total Tanks: 3
Tank ID: 1
Material: Marked Unknown
Capacity: 1000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: INTOWN INVESTMENTS INC
2760 LENNONX RD
ATLANTA, GA 30324
Owner Phone 404-233-9241
Product: Other
Status: Currently In Use
Status Date: Not reported
Pipe Type : Not Marked
Pipe Material: Unknown

Facility ID: 9060449
Total Tanks: 3
Tank ID: 1
Material: Marked Unknown
Capacity: 1000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: INTOWN INVESTMENTS INC
2760 LENNONX RD
ATLANTA, GA 30324
Owner Phone 404-233-9241
Product: Other
Status: Upgrade Repair Not Marked
Status Date: Not reported
Pipe Type : Not Marked
Pipe Material: Unknown

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
23 NNW 1/4-1/2 1393 ft. Relative: Higher Actual: 1002 ft.	**SYSTEM PARKING, INC.** **293 COUTLAND STREET** **ATLANTA, GA**	**GA NON-HSI**	**S104240253** **N/A**

Non-HSI:
Latitude/Longitude: 0.00000 / 0.00000
Ground Water Pathway Score: Not reported
On-Site Pathway Score: Not reported
Report Date: 11/01/99
Contaminants: tetrachloroethylene

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
24 South 1/4-1/2 1470 ft. Relative: Lower Actual: 990 ft.	**HUGH SPALDING CHILDRENS HOSPITAL** **35 JESSIE HILL JR DR SE** **ATLANTA, GA 30303**	**LUST** **UST**	**U003550738** **N/A**

LUST:
Facility ID: 00600266
Leak ID: 1
Date Received: 04/07/97
Project Officer: Revell-Robinson,Isabelle
Description: Suspected Release Received

UST:
Facility ID: 600266
Total Tanks: 1
Tank ID: 1
Material: Steel-Impressed Current
Capacity: 3000
Overfill Protection:
Spill Date : 03/08/96
Overfill Installed : 03/08/96
Tank Exempt From Spill : Not reported
Owner: GRADY HEALTH SYSTEM
80 JESSIE HILL JR DR SE
ATLANTA, GA 30303
Owner Phone 404-616-3765
Product: Diesel
Status: Installed
Status Date: 03/21/84
Pipe Type : Suction: Valve At The Tank
Pipe Material: Cathodically Protected

Facility ID: 600266
Total Tanks: 1
Tank ID: 1
Material: Steel-Impressed Current
Capacity: 3000
Overfill Protection:
Spill Date : 03/08/96
Overfill Installed : 03/08/96
Tank Exempt From Spill : Not reported
Owner: GRADY HEALTH SYSTEM
80 JESSIE HILL JR DR SE
ATLANTA, GA 30303
Owner Phone 404-616-3765
Product: Diesel
Status: Currently In Use
Status Date: / /

Map ID / Direction / Distance / Distance (ft.) / Elevation | Site | Database(s) | EDR ID Number / EPA ID Number

EASEWAY FOOD (Continued) 1006781746

FINDS:
Other Pertinent Environmental Activity Identified at Site:
GEORGIA-GEOGRAPHIC ENVIRONMENTAL INFORMATION MANAGEMENT SYSTEM

LUST:

Facility ID:	00600843
Leak ID:	1
Date Received:	06/07/90
Project Officer:	Humphris,David D
Description:	Confirmed Release Received

Facility ID:	00600843
Leak ID:	1
Date Received:	07/17/90
Project Officer:	Humphris,David D
Description:	Confirmed Release Received

Facility ID:	00600843
Leak ID:	2
Date Received:	10/08/03
Project Officer:	Humphris,David D
Description:	Confirmed Release Received

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28 **GA POWER CO. - TOWER-BUILDING BIN #** GA NON-HSI S105872308
North **333 PIEDMONT AVE.** N/A
1/4-1/2 **ATLANTA, GA 30308**
2067 ft.

Relative: Lower
Actual: 988 ft.

Non-HSI:

Latitude/Longitude:	0.00000 / 0.00000
Ground Water Pathway Score:	0
On-Site Pathway Score:	0
Report Date:	/ /
Contaminants:	Not reported

Latitude/Longitude:	Not reported
Ground Water Pathway Score:	0
On-Site Pathway Score:	0
Report Date:	/ /
Contaminants:	Not reported

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29 **ENTERPRISE LEASING CO** FINDS 1006779180
NNW **303 COURTLAND ST NE** LUST 110013485184
1/4-1/2 **ATLANTA, GA 30303**
2099 ft.

Relative: Higher
Actual: 1001 ft.

FINDS:
Other Pertinent Environmental Activity Identified at Site:
GEORGIA-GEOGRAPHIC ENVIRONMENTAL INFORMATION MANAGEMENT SYSTEM

LUST:

Facility ID:	00600803
Leak ID:	1
Date Received:	06/10/02
Project Officer:	Wallace,Ronald J
Description:	Confirmed Release Received

Map ID / Direction / Distance / Distance (ft.) / Elevation | Site | Database(s) | EDR ID Number / EPA ID Number

F30 **M&F CO. PROPERTY** GA NON-HSI S104819424
NW **237 PEACHTREE ST, SW** N/A
1/4-1/2 **ATLANTA, GA 30303**
2106 ft.

Site 1 of 2 in cluster F

Relative: Higher
Actual: 1056 ft.

Non-HSI:

Latitude/Longitude:	0.00000 / 0.00000
Ground Water Pathway Score:	3.3
On-Site Pathway Score:	0
Report Date:	08/01/98
Contaminants:	xylene

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31 **DOBBS/JACKSON ABANDONED DRUM** CERCLIS 1007985303
East **399 JOHN WESLEY DOBBS AVENUE** GAN000409709
1/4-1/2 **ATLANTA, GA 30312**
2190 ft.

Relative: Higher
Actual: 1033 ft.

CERCLIS Classification Date:

Federal Facility:	Not a Federal Facility		
Non NPL Status:	Removal Only Site (No Site Assessment Work Needed)		
NPL Status:	Not on the NPL		
Contact:	RANDALL CHAFFINS	Contact Tel:	(404) 562-8910
Contact Title:	Not reported		

CERCLIS Assessment History:

Assessment:	REMOVAL	Completed:	01/05/2005
Assessment:	ADMINISTRATIVE RECORDS	Completed:	02/08/2006

CERCLIS Site Status:
Not reported

F32 **ATLANTA CITY DETENTION CTR.** GA NON-HSI S104819355
WNW **254 PEACHTREE ST., SW** N/A
1/4-1/2 **ATLANTA, GA 30303**
2234 ft.

Site 2 of 2 in cluster F

Relative: Higher
Actual: 1062 ft.

Non-HSI:

Latitude/Longitude:	0.00000 / 0.00000
Ground Water Pathway Score:	8.1
On-Site Pathway Score:	0
Report Date:	/ /
Contaminants:	Not reported

G33 **GA STATE UNIV. PROPERTY** GA NON-HSI S103908806
WSW **70 BROAD ST** N/A
1/4-1/2 **ATLANTA, GA**
2295 ft.

Site 1 of 2 in cluster G

Relative: Higher
Actual: 1060 ft.

Non-HSI:

Latitude/Longitude:	33.75610 / 84.38870
Ground Water Pathway Score:	Not reported
On-Site Pathway Score:	Not reported
Report Date:	02/01/99
Contaminants:	Not reported

GA POWER CO/GENERAL OFFICE (Continued) U001489567

Owner:	GEORGIA POWER COMPANY
	958 KEY ST BIN 75013
	MACON, GA 31213
Owner Phone	478-784-5832
Product:	Gas
Status:	Closed In Ground
Status Date:	3/12/1990
Pipe Type :	Not Marked
Pipe Material:	Galvanized Steel
Facility ID:	9000569
Total Tanks:	4
Tank ID:	3
Material:	Bare Steel
Capacity:	280
Overfill Protection:	Yes
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Yes
Owner:	GEORGIA POWER COMPANY
	958 KEY ST BIN 75013
	MACON, GA 31213
Owner Phone	478-784-5832
Product:	Used Oil
Status:	Installed
Status Date:	5/13/1961
Pipe Type :	Not Marked
Pipe Material:	Unknown
Facility ID:	9000569
Total Tanks:	4
Tank ID:	3
Material:	Bare Steel
Capacity:	280
Overfill Protection:	Yes
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Yes
Owner:	GEORGIA POWER COMPANY
	958 KEY ST BIN 75013
	MACON, GA 31213
Owner Phone	478-784-5832
Product:	Used Oil
Status:	Closed In Ground
Status Date:	5/31/1990
Pipe Type :	Not Marked
Pipe Material:	Unknown
Facility ID:	9000569
Total Tanks:	4
Tank ID:	3
Material:	Bare Steel
Capacity:	280
Overfill Protection:	Yes
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Yes

GA POWER CO/GENERAL OFFICE (Continued) U001489567

Owner:	GEORGIA POWER COMPANY
	958 KEY ST BIN 75013
	MACON, GA 31213
Owner Phone	478-784-5832
Product:	Used Oil
Status:	Upgrade Repair Not Marked
Status Date:	Not reported
Pipe Type :	Not Marked
Pipe Material:	Unknown
Facility ID:	9000569
Total Tanks:	4
Tank ID:	4
Material:	Concrete
Capacity:	20000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	GEORGIA POWER COMPANY
	958 KEY ST BIN 75013
	MACON, GA 31213
Owner Phone	478-784-5832
Product:	Empty
Status:	Installed
Status Date:	5/13/1961
Pipe Type :	Not Marked
Pipe Material:	Unknown
Facility ID:	9000569
Total Tanks:	4
Tank ID:	4
Material:	Concrete
Capacity:	20000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	GEORGIA POWER COMPANY
	958 KEY ST BIN 75013
	MACON, GA 31213
Owner Phone	478-784-5832
Product:	Empty
Status:	Permanently Out Of Use
Status Date:	Not reported
Pipe Type :	Not Marked
Pipe Material:	Unknown
Facility ID:	9000569
Total Tanks:	4
Tank ID:	4
Material:	Concrete
Capacity:	20000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported

GA POWER/GEN OFF-MAINT & OP (Continued) U001478451

Material: Double Walled
Capacity: 10000
Overfill Protection:
Spill Date : 03/10/92
Overfill Installed : 03/10/92
Tank Exempt From Spill : Not reported
Owner: GEORGIA POWER COMPANY
958 KEY ST BIN 75013
MACON, GA 31213
Owner Phone 478-784-5832
Product: Gas
Status: Installed
Status Date: 03/10/92
Pipe Type : Pressure
Pipe Material: Fiberglass Reinforced Plastic

Facility ID: 600730
Total Tanks: 6
Tank ID: G1
Material: Double Walled
Capacity: 10000
Overfill Protection:
Spill Date : 03/10/92
Overfill Installed : 03/10/92
Tank Exempt From Spill : Not reported
Owner: GEORGIA POWER COMPANY
958 KEY ST BIN 75013
MACON, GA 31213
Owner Phone 478-784-5832
Product: Gas
Status: Closed In Ground
Status Date: 11/01/99
Pipe Type : Pressure
Pipe Material: Fiberglass Reinforced Plastic

Facility ID: 600730
Total Tanks: 6
Tank ID: G1
Material: Double Walled
Capacity: 10000
Overfill Protection:
Spill Date : 03/10/92
Overfill Installed : 03/10/92
Tank Exempt From Spill : Not reported
Owner: GEORGIA POWER COMPANY
958 KEY ST BIN 75013
MACON, GA 31213
Owner Phone 478-784-5832
Product: Gas
Status: Upgrade Repair Not Marked
Status Date: / /
Pipe Type : Pressure
Pipe Material: Fiberglass Reinforced Plastic

Facility ID: 600730
Total Tanks: 6
Tank ID: G2

GA POWER/GEN OFF-MAINT & OP (Continued) U001478451

Material: Double Walled
Capacity: 10000
Overfill Protection:
Spill Date : 03/10/92
Overfill Installed : 03/10/92
Tank Exempt From Spill : Not reported
Owner: GEORGIA POWER COMPANY
958 KEY ST BIN 75013
MACON, GA 31213
Owner Phone 478-784-5832
Product: Gas
Status: Installed
Status Date: 03/10/92
Pipe Type : Pressure
Pipe Material: Fiberglass Reinforced Plastic

Facility ID: 600730
Total Tanks: 6
Tank ID: G2
Material: Double Walled
Capacity: 10000
Overfill Protection:
Spill Date : 03/10/92
Overfill Installed : 03/10/92
Tank Exempt From Spill : Not reported
Owner: GEORGIA POWER COMPANY
958 KEY ST BIN 75013
MACON, GA 31213
Owner Phone 478-784-5832
Product: Gas
Status: Closed In Ground
Status Date: 04/01/99
Pipe Type : Pressure
Pipe Material: Fiberglass Reinforced Plastic

Facility ID: 600730
Total Tanks: 6
Tank ID: G2
Material: Double Walled
Capacity: 10000
Overfill Protection:
Spill Date : 03/10/92
Overfill Installed : 03/10/92
Tank Exempt From Spill : Not reported
Owner: GEORGIA POWER COMPANY
958 KEY ST BIN 75013
MACON, GA 31213
Owner Phone 478-784-5832
Product: Gas
Status: Upgrade Repair Not Marked
Status Date: / /
Pipe Type : Pressure
Pipe Material: Fiberglass Reinforced Plastic

Facility ID: 600730
Total Tanks: 6
Tank ID: 2

GA POWER/GEN OFF-MAINT & OP (Continued) U001478451

Material: Bare Steel
Capacity: 10000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: GEORGIA POWER COMPANY
958 KEY ST BIN 75013
MACON, GA 31213
Owner Phone 478-784-5832
Product: Gas
Status: Installed
Status Date: 05/08/81
Pipe Type : Not Marked
Pipe Material: Unknown

Facility ID: 600730
Total Tanks: 6
Tank ID: 4
Material: Bare Steel
Capacity: 10000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: GEORGIA POWER COMPANY
958 KEY ST BIN 75013
MACON, GA 31213
Owner Phone 478-784-5832
Product: Gas
Status: Removed From Ground
Status Date: 06/28/91
Pipe Type : Not Marked
Pipe Material: Unknown

Facility ID: 600730
Total Tanks: 6
Tank ID: 4
Material: Bare Steel
Capacity: 10000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: GEORGIA POWER COMPANY
958 KEY ST BIN 75013
MACON, GA 31213
Owner Phone 478-784-5832
Product: Gas
Status: Upgrade Repair Not Marked
Status Date: / /
Pipe Type : Not Marked
Pipe Material: Unknown

37 PRIOR TIRE CO FINDS 1006780786
ENE 375 HIGHLAND AVE NE LUST 110013501479
1/4-1/2 ATLANTA, GA 30312 UST
2556 ft.

Relative: Higher

Actual: 1018 ft.

FINDS:
Other Pertinent Environmental Activity Identified at Site:
GEORGIA-GEOGRAPHIC ENVIRONMENTAL INFORMATION MANAGEMENT SYSTEM

LUST:
Facility ID: 00600526
Leak ID: 1
Date Received: 07/28/99
Project Officer: Burris,Stephen B
Description: Confirmed Release Received

UST:
Facility ID: 600526
Total Tanks: 3
Tank ID: 1A
Material: Unknown
Capacity: 10000
Overfill Protection:
Spill Date : 01/20/94
Overfill Installed : 01/20/94
Tank Exempt From Spill : Not reported
Owner: PRIOR TIRE COMPANY
375 HIGHLAND AVE NE
ATLANTA, GA 30379
Owner Phone 404-522-8866
Product: Gas
Status: Installed
Status Date: 01/20/94
Pipe Type : Pressure
Pipe Material: Fiberglass Reinforced Plastic

Facility ID: 600526
Total Tanks: 3
Tank ID: 1A
Material: Unknown
Capacity: 10000
Overfill Protection:
Spill Date : 01/20/94
Overfill Installed : 01/20/94
Tank Exempt From Spill : Not reported
Owner: PRIOR TIRE COMPANY
375 HIGHLAND AVE NE
ATLANTA, GA 30379
Owner Phone 404-522-8866
Product: Gas
Status: Currently In Use
Status Date: / /
Pipe Type : Pressure
Pipe Material: Fiberglass Reinforced Plastic

Facility ID: 600526
Total Tanks: 3
Tank ID: 1A
Material: Unknown
Capacity: 10000

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
	PRIOR TIRE CO (Continued)		1006780786
	Overfill Protection:		
	Spill Date : / /		
	Overfill Installed : / /		
	Tank Exempt From Spill : Not reported		
	Owner: PRIOR TIRE COMPANY 375 HIGHLAND AVE NE ATLANTA, GA 30379		
	Owner Phone 404-522-8866		
	Product: Gas		
	Status: Upgrade Repair Not Marked		
	Status Date: / /		
	Pipe Type : Not Marked		
	Pipe Material: Unknown		
38 **West** **1/2-1** **2692 ft.**	**GEORGIA BLUEPRINT COMPANY** **119 LUCKIE STREET** **ATLANTA, GA**	**GA NON-HSI**	**S104819408** **N/A**
Relative: **Higher**	Non-HSI:		
	Latitude/Longitude: 33.75797 / 84.38994		
Actual: **1047 ft.**	Ground Water Pathway Score: Not reported On-Site Pathway Score: Not reported Report Date: 09/01/99 Contaminants: Not reported		
39 **SW** **1/2-1** **2758 ft.**	**LOT - INTERNATIONAL BLVD.** **BETWEEN COURTLAND/ PEACHTREE CTR** **ATLANTA, GA 30303**	**GA NON-HSI**	**S103439821** **N/A**
Relative: **Higher**	Non-HSI:		
	Latitude/Longitude: 0.00000 / 0.00000		
Actual: **1037 ft.**	Ground Water Pathway Score: 3.25 On-Site Pathway Score: 0 Report Date: / / Contaminants: Not reported		
40 **West** **1/2-1** **2838 ft.**	**IMPERIAL PARKING** **98 CONE STREET** **ATLANTA, GA**	**GA NON-HSI**	**S105707701** **N/A**
Relative: **Higher**	Non-HSI:		
	Latitude/Longitude: 33.75694 / 84.39194		
Actual: **1053 ft.**	Ground Water Pathway Score: Not reported On-Site Pathway Score: Not reported Report Date: 08/02/02 Contaminants: chloroform		

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
41 **South** **1/2-1** **2887 ft.**	**SOUTHERN GE CO.** **263 DECATUR ST.** **ATLANTA, GA 30302**	**GA NON-HSI**	**S104819463** **N/A**
Relative: **Higher**	Non-HSI:		
	Latitude/Longitude: 0.00000 / 0.00000		
Actual: **1024 ft.**	Ground Water Pathway Score: 8.6 On-Site Pathway Score: 0 Report Date: / / Contaminants: Not reported		
42 **West** **1/2-1** **2927 ft.**	**157 LUCKIE STREET** **157 LUCKIE STREET** **ATLANTA, GA**	**GA NON-HSI**	**S105489062** **N/A**
Relative: **Higher**	Non-HSI:		
	Latitude/Longitude: 33.75889 / 84.39083		
Actual: **1039 ft.**	Ground Water Pathway Score: Not reported On-Site Pathway Score: Not reported Report Date: 04/02/02 Contaminants: chloroform		
43 **ESE** **1/2-1** **3072 ft.**	**SCRIPTO PLANT & OFFICE COMPLEX** **435 HOUSTON STREET** **ATLANTA, GA 30312**	**SHWS**	**S101009118** **N/A**
Relative: **Higher**	SHWS:		
	Facid: 10111		
	Lat/Long: 33 45' 30" N / 84 22' 23" W		
Actual: **1020 ft.**	Owner: National Park Service, MLK National Historic Site 450 Auburn Ave. Atlanta, GA 30312		
	Description of regulated substances released at the site: This site has a known release of Arsenic in soil at levels exceeding the reportable quantity. This site has limited access. The nearest resident individual is between 301 and 1000 feet from the area effected by the release. Other substances on site:, Lead; Tetrachloroethene; Trichloroethene; Cyanides (soluble salts and complexes) n.o.s.. Not reported		
	Cleanup Priority: Cleanup activities are being conducted for source materials, soil, and groundwater.		
	EDP Directive: The Director has determined that this site requires corrective action.		
H44 **West** **1/2-1** **3238 ft.**	**CENTENNIAL OLYMPIC PARK** **167 WALTON ST.** **ATLANTA, GA 30303**	**GA NON-HSI**	**S104819379** **N/A**
Relative: **Higher**	**Site 1 of 3 in cluster H** Non-HSI:		
	Latitude/Longitude: 0.00000 / 0.00000		
Actual: **1054 ft.**	Ground Water Pathway Score: 8.13 On-Site Pathway Score: 0 Report Date: / / Contaminants: Not reported		

GEORGIA WORLD CONGRESS CENTER/AU (Continued) U003551455

Tank Exempt From Spill : Not reported
Owner: GEORGIA WORLD CONGRESS CENTER/AU
285 INTERNATIONAL BLVD NW
ATLANTA, GA 30313
Owner Phone 404-223-4800
Product: Gas
Status: Installed
Status Date: 01/01/86
Pipe Type : Suction: Valve At The Tank
Pipe Material: Cathodically Protected

Facility ID: 9060101
Total Tanks: 5
Tank ID: 4A
Material: Cathodically Protected Steel
Capacity: 3000
Overfill Protection:
Spill Date : 10/12/98
Overfill Installed : 10/12/98
Tank Exempt From Spill : Not reported
Owner: GEORGIA WORLD CONGRESS CENTER/AU
285 INTERNATIONAL BLVD NW
ATLANTA, GA 30313
Owner Phone 404-223-4800
Product: Gas
Status: Removed From Ground
Status Date: 11/06/03
Pipe Type : Suction: Valve At The Tank
Pipe Material: Cathodically Protected

Facility ID: 9060101
Total Tanks: 5
Tank ID: 4A
Material: Cathodically Protected Steel
Capacity: 3000
Overfill Protection:
Spill Date : 10/12/98
Overfill Installed : 10/12/98
Tank Exempt From Spill : Not reported
Owner: GEORGIA WORLD CONGRESS CENTER/AU
285 INTERNATIONAL BLVD NW
ATLANTA, GA 30313
Owner Phone 404-223-4800
Product: Gas
Status: Upgrade Repair Not Marked
Status Date: 10/29/98
Pipe Type : Suction: Valve At The Tank
Pipe Material: Cathodically Protected

Facility ID: 9060101
Total Tanks: 5
Tank ID: 4B
Material: Cathodically Protected Steel
Capacity: 3000
Overfill Protection:
Spill Date : 10/12/98
Overfill Installed : 10/12/98

GEORGIA WORLD CONGRESS CENTER/AU (Continued) U003551455

Tank Exempt From Spill : Not reported
Owner: GEORGIA WORLD CONGRESS CENTER/AU
285 INTERNATIONAL BLVD NW
ATLANTA, GA 30313
Owner Phone 404-223-4800
Product: Diesel
Status: Installed
Status Date: 01/01/86
Pipe Type : Suction: Valve At The Tank
Pipe Material: Cathodically Protected

Facility ID: 9060101
Total Tanks: 5
Tank ID: 4B
Material: Cathodically Protected Steel
Capacity: 3000
Overfill Protection:
Spill Date : 10/12/98
Overfill Installed : 10/12/98
Tank Exempt From Spill : Not reported
Owner: GEORGIA WORLD CONGRESS CENTER/AU
285 INTERNATIONAL BLVD NW
ATLANTA, GA 30313
Owner Phone 404-223-4800
Product: Diesel
Status: Removed From Ground
Status Date: 11/06/03
Pipe Type : Suction: Valve At The Tank
Pipe Material: Cathodically Protected

Facility ID: 9060101
Total Tanks: 5
Tank ID: 4B
Material: Cathodically Protected Steel
Capacity: 3000
Overfill Protection:
Spill Date : 10/12/98
Overfill Installed : 10/12/98
Tank Exempt From Spill : Not reported
Owner: GEORGIA WORLD CONGRESS CENTER/AU
285 INTERNATIONAL BLVD NW
ATLANTA, GA 30313
Owner Phone 404-223-4800
Product: Diesel
Status: Upgrade Repair Not Marked
Status Date: 10/29/98
Pipe Type : Suction: Valve At The Tank
Pipe Material: Cathodically Protected

Facility ID: 9060101
Total Tanks: 5
Tank ID: 1
Material: Bare Steel
Capacity: 5000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported

GEORGIA WORLD CONGRESS CENTER/AU (Continued) U003551455

Tank Exempt From Spill : Not reported
Owner: GEORGIA WORLD CONGRESS CENTER/AU
285 INTERNATIONAL BLVD NW
ATLANTA, GA 30313
Owner Phone 404-223-4800
Product: Diesel
Status: Installed
Status Date: 01/01/86
Pipe Type : Not Marked
Pipe Material: Bare Steel

Facility ID: 9060101
Total Tanks: 5
Tank ID: 3
Material: Bare Steel
Capacity: 6000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: GEORGIA WORLD CONGRESS CENTER/AU
285 INTERNATIONAL BLVD NW
ATLANTA, GA 30313
Owner Phone 404-223-4800
Product: Diesel
Status: Removed From Ground
Status Date: 05/01/90
Pipe Type : Not Marked
Pipe Material: Bare Steel

Facility ID: 9060101
Total Tanks: 5
Tank ID: 3
Material: Bare Steel
Capacity: 6000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: GEORGIA WORLD CONGRESS CENTER/AU
285 INTERNATIONAL BLVD NW
ATLANTA, GA 30313
Owner Phone 404-223-4800
Product: Diesel
Status: Upgrade Repair Not Marked
Status Date: / /
Pipe Type : Not Marked
Pipe Material: Bare Steel

51 SSE 1/2-1 3604 ft. **229 GRANT STREET** SHWS S104550862
227-229 GRANT STREET N/A
ATLANTA, GA

Relative: Higher / Actual: 1017 ft.

SHWS:
Facid: 10560
Lat/Long: 33 44' 54" N / 84 22' 36" W
Owner: Glow Properties, LLC. c/o Ranney & Assoc., LLC
900 Peachtree Street
Atlanta, GA 30309
Description of regulated substances released at the site:
This site has a known release of Lead in soil at levels exceeding the reportable quantity. This site has unlimited access. The nearest resident individual is less than 300 feet from the area affected by the release.
Not reported
Cleanup Priority: Cleanup activities are being conducted for source materials and soil. Investigations are being conducted to determine how much cleanup is necessary for groundwater.
EDP Directive: The Director has determined that this site requires corrective action.

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52 WNW 1/2-1 3609 ft. **CENTENNIAL OLYMPIC PARK** GA NON-HSI S104819376
264 TECHWOOD DR. N/A
ATLANTA, GA 30303

Relative: Lower / Actual: 988 ft.

Non-HSI:
Latitude/Longitude: 0.00000 / 0.00000
Ground Water Pathway Score: 8.13
On-Site Pathway Score: 0
Report Date: / /
Contaminants: acetone; methyl isobutyl ketone

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53 WNW 1/2-1 3652 ft. **CENTENNIAL OLYMPIC PARK** GA NON-HSI S104819380
163 HARRIS ST. N/A
ATLANTA, GA 30303

Relative: Higher / Actual: 1010 ft.

Non-HSI:
Latitude/Longitude: 0.00000 / 0.00000
Ground Water Pathway Score: 8.13
On-Site Pathway Score: 0
Report Date: / /
Contaminants: Not reported

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54 West 1/2-1 3674 ft. **CNN CENTER** GA NON-HSI S104819383
190 MARIETTA ST. N/A
ATLANTA, GA 30303

Relative: Higher / Actual: 1047 ft.

Non-HSI:
Latitude/Longitude: 0.00000 / 0.00000
Ground Water Pathway Score: 3.2
On-Site Pathway Score: 0
Report Date: / /
Contaminants: Not reported

MAP FINDINGS

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
63 NW 1/2-1 4229 ft. Relative: Lower Actual: 963 ft.	ATLANTA UNION MISSION COMMUNITY CEN 165 ALEXANDER STREET, NW ATLANTA, GA Non-HSI: Latitude/Longitude: 33.76500 / 84.39250 Ground Water Pathway Score: Not reported On-Site Pathway Score: Not reported Report Date: 07/01/01 Contaminants: trichloroethylene	GA NON-HSI	S105872207 N/A
64 WNW 1/2-1 4301 ft. Relative: Higher Actual: 1030 ft.	BASS PROPERTY 267 MARIETTA ST. ATLANTA, GA 30313 Non-HSI: Latitude/Longitude: 0.00000 / 0.00000 Ground Water Pathway Score: Not reported On-Site Pathway Score: 19.3 Report Date: / / Contaminants: Not reported	GA NON-HSI	S104819366 N/A
65 ENE 1/2-1 4410 ft. Relative: Lower Actual: 986 ft.	FORMER SAF-T-GREEN FACILITY 570 RALPH MCGILL BLVD. ATLANTA, GA 30312 Non-HSI: Latitude/Longitude: 0.00000 / 0.00000 Ground Water Pathway Score: 8.1 On-Site Pathway Score: 0 Report Date: / / Contaminants: Not reported	GA NON-HSI	S104819407 N/A
66 WNW 1/2-1 4560 ft. Relative: Lower Actual: 994 ft.	VACANT LOT 306 HULL ST. ATLANTA, GA 30313 Non-HSI: Latitude/Longitude: 0.00000 / 0.00000 Ground Water Pathway Score: 3.25 On-Site Pathway Score: 0 Report Date: / / Contaminants: 1,1,2-trichloroethane; tetrachloroethene; barium; trichloroethane; cis-1,2-dichloroethane	GA NON-HSI	S104819475 N/A

MAP FINDINGS

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
I67 WNW 1/2-1 4651 ft. Relative: Higher Actual: 1020 ft.	TULL PROPERTY 311 MARIETTA ST. ATLANTA, GA 30324 Site 1 of 2 in cluster I Non-HSI: Latitude/Longitude: 0.00000 / 0.00000 Ground Water Pathway Score: 8.1 On-Site Pathway Score: 0 Report Date: / / Contaminants: Not reported	GA NON-HSI	S104819474 N/A
68 East 1/2-1 4669 ft. Relative: Higher Actual: 1022 ft.	AUBURN AVENUE WAREHOUSE 659 AUBURN AVE ATLANTA, GA Non-HSI: Latitude/Longitude: 33.75586 / 84.36581 Ground Water Pathway Score: Not reported On-Site Pathway Score: Not reported Report Date: 07/01/96 Contaminants: vinyl chloride	GA NON-HSI	S103439756 N/A
I69 WNW 1/2-1 4677 ft. Relative: Higher Actual: 1022 ft.	ATLANTA GAS LIGHT CO. 288-310 THURMOND ATLANTA, GA 30313 Site 2 of 2 in cluster I COAL GAS SITE DESCRIPTION: Gas works is located north of the Georgia World Congress Center, east of Elliott. Site is bordered on the west by the E.T. V. & G. railroad lines and on the east by the W. & A. railroad lines By 1951, gas holders and retorts removed from site. 1889, 1904, 1907, 1911, 1917, 1927, 1932	Coal Gas	G000001636 N/A
70 SW 1/2-1 4754 ft. Relative: Higher Actual: 1018 ft.	CITY OF ATLANTA - BOARD OF EDUCATIO 210 PRYOR STREET ATLANTA, GA Non-HSI: Latitude/Longitude: 33.76222 / 84.39194 Ground Water Pathway Score: Not reported On-Site Pathway Score: Not reported Report Date: 10/01/01 Contaminants: bis(2ethylhexly)phthalate	GA NON-HSI	S105872210 N/A

Map ID / Direction / Distance / Distance (ft.) / Elevation | Site | Database(s) | EDR ID Number / EPA ID Number

75 **ATLANTA GAS LIGHT CO. HOLDERS AND WAREHOUSE.** Coal Gas G000001637
West **274 RHODES** N/A
1/2-1 **ATLANTA, GA 30314**
5171 ft.

Relative: **Higher**

Actual: **1010 ft.**

COAL GAS SITE DESCRIPTION:
Atlante Gas Light Co. has gas holders and supply storage warehouse on the block bordered on the east by the Southern railroad lines. Elliot Street NW runs down through the middle of the site, dividing it in half. Site is one half block north o

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76 **FORMER ATLANTA STOVE WORKS** GA NON-HSI S104819397
East **112 KROG ST.** N/A
1/2-1 **ATLANTA, GA 30307**
5202 ft.

Relative: **Lower**

Actual: **991 ft.**

Non-HSI:
Latitude/Longitude: 0.00000 / 0.00000
Ground Water Pathway Score: 7.7
On-Site Pathway Score: 0.0
Report Date: 11/01/98
Contaminants: cis-1,2-dichloroethylene

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77 **VACANT LOT** GA NON-HSI S103439864
SW **GARNETT @ PRYOR ST.** N/A
1/2-1 **ATLANTA, GA 30303**
5223 ft.

Relative: **Lower**

Actual: **995 ft.**

Non-HSI:
Latitude/Longitude: 0.00000 / 0.00000
Ground Water Pathway Score: 8.1
On-Site Pathway Score: 0
Report Date: / /
Contaminants: lead

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78 **WEBSTER'S AUTO REPAIR** GA Spills S101531457
ENE **683 HIGHLAND AVE** GA NON-HSI N/A
1/2-1 **ATLANTA, GA**
5269 ft.

Relative: **Higher**

Actual: **1024 ft.**

SPILLS:

Spill Number:	03	Report Time:	Not reported
Report Number:	Not reported		
Incident Type:	Not reported	Responsible Party:	Not reported
Material Involved:	HAZARDOUS MATERIAL		
UN Number:	Not reported	Quantity:	Not reported
Phase:	Not reported	Radioactive:	Not reported
Material 2:	Not reported		
UN Number 2:	Not reported	Quantity 2:	Not reported
Phase 2:	Not reported	Radioactive 2:	Not reported
Waterway Impctd:	Not reported		
Evacuation:	Not reported		
Caller:	Not reported		
Organization:	Not reported		
Orgn. Phone:	Not reported		
Emergency Units:	Not reported		
Resp. Party:	Not reported		

Map ID / Direction / Distance / Distance (ft.) / Elevation | Site | Database(s) | EDR ID Number / EPA ID Number

WEBSTER'S AUTO REPAIR (Continued) S101531457

RP Address:	Not reported		
RP Phone:	Not reported		
Action:	NONE		
Investigator:	Not reported		
Time Dispatched:	Not reported	Time EOC Notifd:	Not reported
Report Sum:	Not reported	Complaint Referred	Not reported
DDO:	Not reported	Date Recieved:	Not reported
At:	Not reported	EOC Operator:	Not reported
Referred:	ERT	Spill Date/Time:	02/19/93
Additional Info:	Not reported		
Nature :	Not reported		
Action Code:	Not reported	Complaint Code:	Not reported
Complaint Id:	Not reported		
Substance:	Not reported		
Location:	Not reported		
Source :	Not reported		
Details :	Not reported		
Comments :	Not Reported		

Non-HSI:
Latitude/Longitude: 33.76078 / 84.37889
Ground Water Pathway Score: Not reported
On-Site Pathway Score: Not reported
Report Date: 05/01/00
Contaminants: tetrachloroethylene

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79 **BLACKBOX** GA NON-HSI S106678167
East **154 KROG STREET** N/A
1/2-1 **ATLANTA, GA**
5277 ft.

Relative: **Lower**

Actual: **983 ft.**

Non-HSI:
Latitude/Longitude: 33.75778 / 84.36389
Ground Water Pathway Score: Not reported
On-Site Pathway Score: Not reported
Report Date: 04/04/04
Contaminants: tetrachloroethene, lead

Date of Government Version: 05/17/05
Date Made Active at EDR: 08/17/05
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 06/20/05
Elapsed ASTM days: 58
Date of Last EDR Contact: 06/20/05

CORRACTS: Corrective Action Report
Source: EPA
Telephone: 800-424-9346
CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 06/28/05
Date Made Active at EDR: 08/08/05
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 07/05/05
Elapsed ASTM days: 34
Date of Last EDR Contact: 06/05/05

RCRA: Resource Conservation and Recovery Act Information
Source: EPA
Telephone: 800-424-9346
RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS). The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month. Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 05/20/05
Date Made Active at EDR: 08/09/05
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 05/24/05
Elapsed ASTM days: 16
Date of Last EDR Contact: 05/24/05

ERNS: Emergency Response Notification System
Source: National Response Center, United States Coast Guard
Telephone: 202-260-2342
Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 12/31/04
Date Made Active at EDR: 03/24/05
Database Release Frequency: Annually

Date of Data Arrival at EDR: 01/27/05
Elapsed ASTM days: 56
Date of Last EDR Contact: 07/25/05

FEDERAL ASTM SUPPLEMENTAL RECORDS

BRS: Biennial Reporting System
Source: EPA/NTIS
Telephone: 800-424-9346
The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/03
Database Release Frequency: Biennially

Date of Last EDR Contact: 06/17/05
Date of Next Scheduled EDR Contact: 09/12/05

CONSENT: Superfund (CERCLA) Consent Decrees
Source: Department of Justice, Consent Decree Library
Telephone: Varies
Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: 12/14/04
Database Release Frequency: Varies

Date of Last EDR Contact: 07/25/05
Date of Next Scheduled EDR Contact: 10/24/05

ROD: Records Of Decision
Source: EPA
Telephone: 703-416-0223
Record of Decision. ROD documents mandate a permanant remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 06/08/05
Database Release Frequency: Annually

Date of Last EDR Contact: 07/06/05
Date of Next Scheduled EDR Contact: 10/03/05

DELISTED NPL: National Priority List Deletions
Source: EPA
Telephone: N/A
The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 04/28/05
Database Release Frequency: Quarterly

Date of Last EDR Contact: 05/04/05
Date of Next Scheduled EDR Contact: 08/01/05

FINDS: Facility Index System/Facility Registry System
Source: EPA
Telephone: (404) 562-8174
Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 07/11/05
Database Release Frequency: Quarterly

Date of Last EDR Contact: 07/05/05
Date of Next Scheduled EDR Contact: 10/03/05

HMIRS: Hazardous Materials Information Reporting System
Source: U.S. Department of Transportation
Telephone: 202-366-4555
Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 12/31/04
Database Release Frequency: Annually

Date of Last EDR Contact: 07/22/05
Date of Next Scheduled EDR Contact: 10/17/05

MLTS: Material Licensing Tracking System
Source: Nuclear Regulatory Commission
Telephone: 301-415-7169
MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/14/05
Database Release Frequency: Quarterly

Date of Last EDR Contact: 07/05/05
Date of Next Scheduled EDR Contact: 10/03/05

MINES: Mines Master Index File
Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-5959
Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

SSTS: Section 7 Tracking Systems
Source: EPA
Telephone: 202-564-4203
Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year: Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/03
Database Release Frequency: Annually
Date of Last EDR Contact: 07/18/05
Date of Next Scheduled EDR Contact: 10/17/05

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-566-1667
FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/13/05
Database Release Frequency: Quarterly
Date of Last EDR Contact: 06/20/05
Date of Next Scheduled EDR Contact: 09/19/05

STATE OF GEORGIA ASTM STANDARD RECORDS

SHWS: Hazardous Site Inventory
Source: Department of Environmental Protection
Telephone: 404-657-8600
State Hazardous Waste Sites. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. Available information varies by state.

Date of Government Version: 07/01/04
Date Made Active at EDR: 11/03/04
Database Release Frequency: Annually
Date of Data Arrival at EDR: 10/19/04
Elapsed ASTM days: 15
Date of Last EDR Contact: 06/06/05

SWF/LF: Solid Waste Disposal Facilities
Source: Department of Natural Resources
Telephone: 404-362-2696
Source: Center for GIS, Georgia Institute of Technology
Telephone: 404-385-0900
Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 05/31/05
Date Made Active at EDR: 06/27/05
Database Release Frequency: Semi-Annually
Date of Data Arrival at EDR: 05/31/05
Elapsed ASTM days: 27
Date of Last EDR Contact: 05/31/05

LUST: List of Leaking Underground Storage Tanks
Source: Environmental Protection Division
Telephone: 404-362-2687
Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 06/07/05
Date Made Active at EDR: 08/05/05
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 07/12/05
Elapsed ASTM days: 24
Date of Last EDR Contact: 07/12/05

UST: Underground Storage Tank Database
Source: Environmental Protection Division
Telephone: 404-362-2687
Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 01/21/05
Date Made Active at EDR: 02/23/05
Database Release Frequency: Annually
Date of Data Arrival at EDR: 01/27/05
Elapsed ASTM days: 27
Date of Last EDR Contact: 07/11/05

HIST LF: Historical Landfills
Source: Department of Natural Resources
Telephone: 404-362-2696
Landfills that were closed many years ago.

Date of Government Version: 01/15/03
Date Made Active at EDR: 02/06/04
Database Release Frequency: Varies
Date of Data Arrival at EDR: 01/20/04
Elapsed ASTM days: 17
Date of Last EDR Contact: 01/20/04

STATE OF GEORGIA ASTM SUPPLEMENTAL RECORDS

SPILLS: Spills Information
Source: Department of Natural Resources
Telephone: 404-656-6905
Oil or Hazardous Material Spills or Releases.

Date of Government Version: 04/30/05
Database Release Frequency: Quarterly
Date of Last EDR Contact: 07/25/05
Date of Next Scheduled EDR Contact: 10/24/05

NON HSI: Non-Hazardous Site Inventory
Source: Rindt-McDuff Associates, Inc.
Telephone: N/A
This list was obtained by EDR in 1998 and contains property listings that have reported contamination of soil or groundwater under the Georgia Hazardous Site Response Act (HSRA). These sites were not placed on the Georgia Priority list (Hazardous Site Inventory or HSI) because their hazard evaluation scores did not exceed the threshold levels established for sites posing an imminent threat to health or the environment. Disclaimer provided by Rindt-McDuff Associates - the database information has been obtained from publicly available sources produced by other entities. While reasonable steps have been taken to insure the accuracy of the data, RMA does not guarantee the accuracy of the data. No claim is made for the actual existence of pollution at any site. This data does not constitute a legal opinion.

Date of Government Version: 04/15/05
Database Release Frequency: Annually
Date of Last EDR Contact: 07/05/05
Date of Next Scheduled EDR Contact: 10/03/05

DRYCLEANERS: Drycleaner Database
Source: Department of Natural Resources
Telephone: 404-363-7000
A listing of drycleaners in Georgia.

Data of Government Version: 06/23/05
Database Release Frequency: Varies
Date of Last EDR Contact: 06/23/05
Date of Next Scheduled EDR Contact: N/A

EDR PROPRIETARY HISTORICAL DATABASES

Former Manufactured Gas (Coal Gas) Sites: The existence and location of Coal Gas sites is provided exclusively to EDR by Real Property Scan, Inc. For a technical description of the types of hazards which may be found at such sites, contact your EDR customer service representative.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

STREET AND ADDRESS INFORMATION

APPENDIX B – DESCRIPTION OF REGULATORY DATABASES AND RECORDS

The National Priority List (NPL), also known as the Superfund List, is a United States Environmental Protection Agency (EPA) listing of known, uncontrolled or abandoned hazardous waste sites. Inclusion on this list is primarily based on a score that the site receives from the EPA's Hazardous Ranking System. NPL sites are targeted for possible long-term remedial action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), or Superfund.

The EPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) list is a compilation of known and suspected, uncontrolled or abandoned, hazardous waste sites, including NPL or Superfund sites. CERCLIS sites have been investigated, or are currently under investigation, by the EPA, for the release, or threatened release, of hazardous substances. CERCLIS sites may ultimately be listed on the NPL.

The EPA's Resource Conservation and Recovery Act - Treatment, Storage and Disposal (RCRA TSD) Facilities list is a compilation of facilities, which report to the EPA that they treat, store, or dispose of hazardous waste.

The EPA's Resource Conservation and Recovery Act (RCRA) Generators list is a compilation of facilities that generate hazardous wastes and report to the EPA. The RCRA Generators list includes facilities such as automotive repair shops, dry cleaners, and other small businesses which use or generate small quantities of hazardous substances.

The EPA's CORRACTS database is a compilation of RCRA facilities that are under corrective action. The database includes both TSD and generator facilities.

The EPA's Emergency Response Network System (ERNS) database contains information regarding reported spills or accidents involving hazardous chemicals. The information contained in the ERNS database is gathered through phone calls or written notifications and is, in many cases, incomplete.

The EPD's Hazardous Site Inventory (HSI) is a list of sites in Georgia known to have had a release of a regulated substance above a reportable quantity, as defined in the Georgia regulations. The HSI includes sites reported and evaluated in accordance with the Georgia Hazardous Site Response Act (HSRA) as potentially harmful to human health or the environment. Listed facilities have, at a minimum, restrictions placed on the use of the property, and may also have active remediation required by the EPD.

The EPD's Solid Waste Facilities List and Industrial Waste Facilities List include permitted solid waste facilities. The EPD Landfill Inventory includes permitted solid waste facilities.

The EPD maintains a list of registered underground storage tank (UST) locations for the State of Georgia.

The EPD maintains a listing of suspected or confirmed leaking underground storage tanks (LUST) sites for the State of Georgia.

APPENDIX C – SITE/AREA PHOTOGRAPHS

SUBJECT PHOTOGRAPHS # 2004.1249.15

Photo # 1.: View of the graded eastern portion of the Project Site.

Photo # 2.: View of the adjacent Shell Station to the west.

Photo # 3.: Facing north along the western portion of the Project Site.

Photo # 4.: Monitoring well cap located near the southern boundary of the Project Site.

APPENDIX D – INTERVIEW FORMS

UNITED CONSULTING
RECORD OF COMMUNICATION

Project Name: Georgia State University Housing **Project Number:** 2004.1249.15

Communications With: Chief Parker

Of: City of Atlanta Fire Department

Location: Telephone Conversation **Phone:** 404-853-7065

Communication via: **(X) Telephone Conversation** **() Discussions During Reconnaissance** **() Office Visit/Meeting** **() Other**

Recorded by: Alex Hallford **Of:** United Consulting

At: (time) 1:30 pm **on: (date)** August 23, 2005

Re:

Subject: Emergency responses to the Project Site involving hazardous materials

Summary of Communication:

United Consulting contacted Chief Parker, the City of Atlanta Inspection Chief, with the City of Atlanta Fire Department to search the City of Atlanta's records for any incidents that have occurred at the Project Site. Chief Parker stated that the City of Atlanta had no records of any responses to the 141 Piedmont Avenue property for fires, chemical spills or environmental issues.

Conclusions, Actions Taken, Required, or Recommended:

Follow up Required: When, With and By Whom:

UNITED CONSULTING
RECORD OF COMMUNICATION

Project Name: Georgia State University Housing **Project Number:** 2004.1249.15

Communications With: Grading company representative

Of: Dennis Taylor and Company Grading

Location: Project Site **Phone:** N/A

Communication via: () **Telephone Conversation** (X) **Discussions During Reconnaissance** () **Office Visit/Meeting** () **Other**

Recorded by: Alex Hallford **Of:** United Consulting

At: (time) 10:00 am **on: (date)** August 24, 2005

Re:

Subject: Fuel supply for grading equipment

Summary of Communication:

A representative of the Dennis Taylor and Company Grading company was interviewed. He stated that he did not wish to give United Consulting his name. The representative stated that the grading equipment located on the Project Site was fueled from a fuel truck and that no ASTs were present on the Project Site.

Conclusions, Actions Taken, Required, or Recommended:

Follow up Required: When, With and By Whom:

UNITED CONSULTING
RECORD OF COMMUNICATION

Project Name: Georgia State University Housing **Project Number:** 2004.1249.15

Communications With: Craig Pendergrast

Of: Representative of the Owner of the Project Site

Location: Via Email **Phone:** N/A

Communication via: () **Telephone Conversation** () **Discussions During Reconnaissance** () **Office Visit/Meeting** (X) **Other**

Recorded by: Russell Griebel **Of:** United Consulting

At: (time) 4:00 pm **on: (date)** August 26, 2005

Re:

Subject: Environmental history and ownership of the Project Site

Summary of Communication:

The summary of the communications are contained in an email included in this Appendix.

Conclusions, Actions Taken, Required, or Recommended:

Follow up Required: When, With and By Whom:

Russell Griebel

From: Pendergrast, Craig [CPendergrast@seyfarth.com]
Sent: Monday, August 29, 2005 4:06 PM
To: Mark Lawson; rgriebel@unitedconsulting.com
Cc: Boone Brothers; jmlawson@gsu.edu; John Marshall; Trusty, Bob
Subject: RE: \\\SPAM/// RE: United Consulting: Phase I update

The only thing to add is that Ford Motor Credit provided a 12/02 environmental insurance policy issued by an AIG company with a $250,000 deductible and $10,000,000 limits that provided 10 year claims-made coverage, subject to its terms and conditions, for preexisting contamination, known and unknown, at the site. This was part of the purchase transaction by Piedmont/Ellis, LLC. You are welcome to a copy of that insurance policy if you like.

-----Original Message-----
From: Mark Lawson [mailto:FMDMJL@langate.gsu.edu]
Sent: Monday, August 29, 2005 3:58 PM
To: Pendergrast, Craig; rgriebel@unitedconsulting.com
Cc: Boone Brothers; jmlawson@gsu.edu; John Marshall; Trusty, Bob
Subject: \\\SPAM/// RE: United Consulting: Phase I update

The appraisal that was conducted on the site did not discount for environmental issues relative to the site. Nor am I familiar with any other property that has been sold near the Georgia State's campus recently that factored environmental issues into the purchase price.

Mark

>>> "Pendergrast, Craig" <CPendergrast@seyfarth.com> 08/29/05 3:01 PM >>>
See my answers to your email below. Mark, Boone, John, and Bob, please feel free to add anything, and please look at Question No. 4 in particular and let Russ know if you have any comparative value information.

-----Original Message-----
From: Russell Griebel [mailto:rgriebel@unitedconsulting.com]
Sent: Monday, August 29, 2005 2:49 PM
To: Pendergrast, Craig
Subject: RE: United Consulting: Phase I update

Craig, as rep for owner, could you please have these questions answered by the appropriate person. Thanks.

I have a few questions for you regarding this Site (for Phase I Update User
Provided Information section)

1. To your knowledge, are there any indications of executed environmental
liens or deed restrictions associated with the Project Site?

Answer: None

2. Do you have any knowledge of recognized environmental conditions on the
Project Site?

Answer: None at the present time, by reason of the remediation. Historically, yes. My knowledge is no greater than yours. Please see the United CAP, CSR, and other investigation reports, together with the other reports of which you already have knowledge.

3. Do you have any knowledge regarding the value of the property with respect to equal properties in the surrounding area. (i.e., indications of
value reduction due to environmental concerns)?

Answer: I have no such knowledge. By copy of this email, I am posing that same question to others involved with Piedmont/Ellis, LLC who may have such knowledge.

4. Who is the current owner? Can you provide us with contact information so
that we can interview him/her?

Answer: Piedmont/Ellis, LLC. Please contact Mark Lawson, Boone Brothers, and/or John Marshall for further information. Their email addresses are shown on the cc line.

Please email or call me with any questions you may have.

-----Original Message-----
From: Pendergrast, Craig [mailto:CPendergrast@seyfarth.com]
Sent: Monday, August 29, 2005 2:45 PM
To: Russell Griebel; ahallford@unitedconsulting.com
Subject: RE: United Consulting: Phase I update

Piedmont/Ellis, LLC is the current owner. The Board of Regents is the prospective purchaser. The finalization of the update should await issuance of the final LoL. I would like to see a draft of the Update before it goes final.

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From: Russell Griebel [mailto:rgriebel@unitedconsulting.com]
Sent: Monday, August 29, 2005 2:36 PM
To: Pendergrast, Craig; ahallford@unitedconsulting.com
Subject: RE: United Consulting: Phase I update

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Finally, do you want to review a draft doc. before we finalize.

Thanks.

-----Original Message-----
From: Pendergrast, Craig [mailto:CPendergrast@seyfarth.com]
Sent: Thursday, August 25, 2005 3:51 PM
To: ahallford@unitedconsulting.com
Cc: Russell Griebel (E-mail)
Subject: RE: United Consulting: Phase I update

See the c/o's I've added below. The names are accurate and complete.

-----Original Message-----
From: Alex Hallford [mailto:ahallford@unitedconsulting.com]
Sent: Thursday, August 25, 2005 3:47 PM
To: Pendergrast, Craig
Cc: Russell Griebel (E-mail)
Subject: RE: United Consulting: Phase I update

Mr. Pendergrast,
As previously requested, can you provide the proper names and addresses for the parties that need reliance on the Phase I Update? Also, is the list below complete to date?

Board of Regents c/o Joan Sasine
Georgia State University c/o Craig Pendergrast
Georgia State University Foundation c/o Craig Pendergrast
Piedmont/Ellis, LLC c/o Craig Pendergrast
The Atlanta Development Authority c/o Craig Pendergrast
The Bank of New York Trust Company, N.A. c/o Earle Taylor at Kilpatrick Stockton here in Atlanta

Thank you,
Alex Hallford
Environmental Specialist
Phone: 770-582-2827
Fax: 770-582-2900
http://www.unitedconsulting.com

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Russell Griebel

From: John Marshall [LEGJDM@langate.gsu.edu]
Sent: Monday, August 29, 2005 4:22 PM
To: CPendergrast@seyfarth.com; rgriebel@unitedconsulting.com
Cc: Boone Brothers; jmlawson@gsu.edu; btrusty@seyfarth.com
Subject: \\\SPAM/// RE: United Consulting: Phase I update

The answers, plus the info. on Ford's Environmental Insurance Policy, seem appropriate.

John

>>> "Pendergrast, Craig" <CPendergrast@seyfarth.com> 08/29/2005 3:01:25 PM >>>
See my answers to your email below. Mark, Boone, John, and Bob, please feel free to add anything, and please look at Question No. 4 in particular and let Russ know if you have any comparative value information.

-----Original Message-----
From: Russell Griebel [mailto:rgriebel@unitedconsulting.com]
Sent: Monday, August 29, 2005 2:49 PM
To: Pendergrast, Craig
Subject: RE: United Consulting: Phase I update

Craig, as rep for owner, could you please have these questions answered by the appropriate person. Thanks.

I have a few questions for you regarding this Site (for Phase I Update User
Provided Information section)

1. To your knowledge, are there any indications of executed environmental
liens or deed restrictions associated with the Project Site?

Answer: None

2. Do you have any knowledge of recognized environmental conditions on the
Project Site?

Answer: None at the present time, by reason of the remediation. Historically, yes. My knowledge is no greater than yours. Please see the United CAP, CSR, and other investigation reports, together with the other reports of which you already have knowledge.

3. Do you have any knowledge regarding the value of the property with respect to equal properties in the surrounding area. (i.e., indications of
value reduction due to environmental concerns)?

Answer: I have no such knowledge. By copy of this email, I am posing that same question to others involved with Piedmont/Ellis, LLC who may have such knowledge.

4. Who is the current owner? Can you provide us with contact information so
that we can interview him/her?

Answer: Piedmont/Ellis, LLC. Please contact Mark Lawson, Boone Brothers, and/or John Marshall for further information. Their email

addresses are shown on the cc line.

Please email or call me with any questions you may have.

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Sent: Monday, August 29, 2005 2:45 PM
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Thank you,
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APPENDIX E – REFERENCED DOCUMENTS

Geologic Map of Georgia, 1976, Georgia Geological Survey.

Northwest Atlanta, Georgia 1997, United States Geologic Survey, 7.5 Minute Topographic Quadrangle Map

APPENDIX F – QUALIFICATIONS

United Consulting was formed on January 1, 1990, to provide engineering, environmental and related services. Having evolved directly from a predecessor firm, with all the files and owners from that firm, United Consulting has been in business for almost a quarter of a century providing engineering and environmental services. The Principals started performing Phase I Environmental Assessments in 1986 and have adapted the ASTM standards as they were developed and modified. The company has performed thousands of these assessments, and over 500 in each of the last seven years. All senior personnel reviewing Phase I Environmental Assessments have been practicing in the environmental field for at least four years and have been responsible for over 100 Phase I Environmental Assessments.

APPENDIX G – VCSR (PORTIONS)

September 2, 2005

Ms. Madeleine Kellam
Brownfields Coordinator
Hazardous Waste Management Branch
Environmental Protection Division
Floyd Towers East, Suite 1154
2 Martin Luther King, Jr. Drive SE
Atlanta, Georgia 30334

RE: Brownfields Program -- Voluntary Compliance Status Report
Piedmont/Ellis, LLC and
Board of Regents of the University System of Georgia
Georgia State University Housing (Former Beaudry Ford)
141 Piedmont Avenue
Atlanta, Fulton County, Georgia
Project No. 2004.1249.12

Dear Ms. Kellam:

On behalf of Piedmont/Ellis, LLC ("Piedmont/Ellis"), an affiliate of the Georgia State University Foundation, and the Board of Regents of the University System of Georgia (BoR), I am pleased to submit this Voluntary Compliance Status Report (VCSR) for the above-referenced Project Site pursuant to the Georgia Hazardous Site Reuse and Redevelopment Act, Section 12-8-200 et.seq.(the "Brownfields Act"). Piedmont/Ellis has implemented the remedial action as set forth in the July 1, 2005 Voluntary Corrective Action Plan (VCAP), approved in writing by the Environmental Protection Division (EPD) on July 5, 2005 through issuance of a conditional limitation of liability letter, and as amended on August 16, 2005.

We appreciate your attention to this submittal. This VCSR is submitted in connection with the redevelopment of the property as much-needed downtown dormitories for Georgia State University. We believe that this is a prime example of a redevelopment project that the Brownfields Act was intended to facilitate. We would very much appreciate receiving a letter from you as soon as possible to confirm EPD's concurrence with the VCSR and the satisfaction of the conditions to finalization of the limitation of liability as to Piedmont/Ellis, the BoR, and their successors-in-title. Please contact Russell Griebel with Piedmont/Ellis's environmental consultant United Consulting at 770-582-2788, Craig Pendergrast, Piedmont/Ellis's environmental attorney at Seyfarth, Shaw at 404-885-6732, and/or Joan Sasine, the BoR's environmental attorney at Powell, Goldstein at 404-572-6647 if you have any questions or if we can be of further assistance.

Sincerely,

PIEDMONT/ELLIS, LLC

BY: Craig Pendergrast

Its: Attorney

h:/geoenviro/reports/2004/2004.1249.GSU/2004.1249.12.PPCSR-Final-EPDrev

Brownfields Program
Voluntary Compliance Status Report

For:

Georgia State University Housing (Former Beaudry Ford)
141 Piedmont Avenue
Atlanta, Fulton County, Georgia
Project No. 2004.1249.12

Applicants:

Piedmont/Ellis, LLC
C/O Craig Pendergrast, Seyfarth, Shaw LLP
and
Board of Regents of the University System of Georgia
C/O Joan Sasine, Powell Goldstein LLP

Delivered to:

Ms. Madeleine Kellam
Brownfields Coordinator
Hazardous Waste Management Branch
Environmental Protection Division
Floyd Towers East, Suite 1154
2 Martin Luther King, Jr. Drive SE
Atlanta, Georgia 30334

Prepared by:

United Consulting
625 Holcomb Bridge Road
Norcross, Georgia 30071

September 2, 2005

TABLE OF CONTENTS

Figures

Tables

Appendices

STATEMENT OF FINDINGS

Following is a concise statement of the findings of the Voluntary Compliance Status Report (VCSR).

Background

This report is for the Georgia State University Housing (Former Beaudry Ford) site, which is referenced by the address of 141 Piedmont Avenue in Atlanta, Fulton County, Georgia. An application for a Brownfield limitation of liability was previously submitted to the Environmental Protection Division (EPD), in the form of a Voluntary Corrective Action Plan (VCAP) for the Project Site, pursuant to the Georgia Hazardous Site Reuse and Redevelopment Act, Section 12-8-200 et.seq. (the Brownfields Act). The July 1, 2005 VCAP was subsequently approved in writing by the EPD on July 5, 2005. Since that date, the VCAP has been amended to add the Board of Regents of the University System of Georgia (BoR) as a Prospective Purchaser for purposes of the limitation of liability protections under the Brownfields Act and to add certain substances regulated under the Georgia Hazardous Site Response Act (HSRA) that were discovered in the course of implementation of the original VCAP. The VCAP, as amended, has now been fully implemented, and the implementation activities are summarized herein, along with certification of compliance with the applicable Type 1 or 2 residential risk reduction standards (RRS) under HSRA and the Brownfields Act for the constituents identified (CI) in the soil.

Investigations

As stated in the VCAP, as amended, numerous subsurface investigations have been conducted at the Site by United Consulting and others. The results of these investigations were used to prepare the VCAP and this VCSR. The extent of soil and groundwater impacts on the Project Site have been assessed through various sampling as reported herein.

Four areas of soil impacts were identified with concentrations of various volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) greater than an applicable RRS, and one area with soil impacts has been identified with a concentrations of lead greater than the applicable Type 2 RRS and arsenic greater than the applicable Type 1 RRS. As such, soil removal operations were conducted in these areas, and verification sampling confirmed the removal of all soils with CI at concentrations in excess of the applicable residential RRS.

Groundwater impacts at the site included the chemicals: 1,2-dichlorobenzene, 1,2-dichloroethane, benzene, cyclohexane, ethyl-benzene, isopropylbenzene, methylcyclohexane, methyl tert-butyl ether, tetrachloroethene (PCE), toluene, xylenes, 2-methylnaphthalene, and naphthalene. By reason of the provisions of the Brownfield Act and its limitation of liability provisions, in conjunction with a prior non-listing letter that was issued by EPD following notification of the finding of groundwater impact at the site, remedial action for the groundwater is not required.

Free product was previously detected in one monitoring well at the Project Site. Analytical testing of the free product and soils near the groundwater table indicated that these materials may be indicative of old petroleum or mineral spirits. The compounds detected in the free product included certain CIs. During soil removal operations in this area, approximately three feet of soils were removed from below the elevation where the free product was previously observed. This was conducted to remove the free product from the soil pore space. Removal of free product from the area was verified through confirmation sampling.

Risk Reduction Standards and Site Compliance

Type 1 Risk Reduction Standards (RRS) were calculated for the CI in the soil at the Site. Type 2 RRS were also calculated for lead, mercury, and silver in the soil at the Site.

Soil impacts at the Site included: arsenic, barium, chromium, lead, mercury, silver, acetone, 1,2-dichlorobenzene, 1,2-dichloroethane, cis-1,2-dichloroethene, 2-butanone, benzene, cyclohexane, ethyl-benzene, isopropylbenzene, methylcyclohexane*, methyl tert-butyl ether*, tetrachloroethene (PCE), toluene, trichloroethene, xylenes, 1,1-biphenyl*, 2-methylnaphthalene*, naphthalene, acenapthylene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)flouroanthene, benzo(ghi)perylene, benzo(k)flouroanthene, carbozole*, chrysene, dibenz(a,h)anthracene, dibenzofuran*, flouroanthene, flourane, indeno(123)pyrene, phenanthrene, and pyrene. Prior to excavation operations in four isolated areas of the site, Type 1 RRS exceedences for PCE, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene. benzo(k)fluoranthene, chrysene, dibenz(a,h)anthracene, indeno(1,2,3)pyrene, and phenanthrene were identified on the Project Site and the area of these soil contaminants was identified. Prior to excavation operations in one isolated area of the site, Type 2 RRS exceedence for lead and Type 1 RRS exceedence for arsenic were identified on the Project Site, and the area of these soil impacts was determined. These five areas of soil impacts in excess of the applicable RRS were excavated and disposed in accordance with the procedures outlined in the VCAP, as amended, and confirmatory samples were performed as provided in the application. The results of the confirmatory testing reveal the concentrations in the remaining soils meet residential Type 1 and/or 2 RRS, as appropriate.

* These constituents are currently not regulated under the HSRA.

Certification of Compliance

Piedmont/Ellis, LLC

I certify under penalty of law that this report and all attachments were prepared under my direction 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.

Based on my review of the findings of this report with respect to the soil risk reduction standards (RRSs) of the Rules for Hazardous Site Response, Rule 391-3-19-.07, I have determined that the soil at this site is in compliance with the Type 1 and/or Type 2 Residential Risk Reduction Standards.

By: Craig Pendergrast

Title: Attorney

PIEDMONT/ELLIS, LLC

Board of Regents of the University System of Georgia

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By: Joan B. Sabine

Title: Special Assistant Attorney General

BOARD OF REGENTS OF THE UNIVERSITY SYSTEM OF GEORGIA

Groundwater Scientist Statement

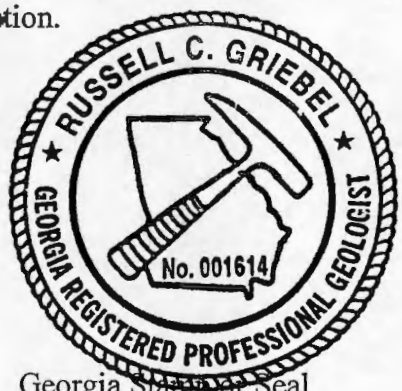
I certify that I am a qualified groundwater scientist who has a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training and experience in groundwater hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport. I further certify that this Compliance Status Report for the Georgia State University Housing (Former Beaudry Ford) located at 141 Piedmont Avenue in Atlanta, Fulton County, Georgia was prepared by myself and appropriate qualified subordinates working under my direction.

UNITED CONSULTING

Name: Russell C. Griebel, P.G.

Signature: _____

Date: 9/2/05



Georgia Stamp or Seal

INTRODUCTION

Site Description

The Project Site consists of 4 acres of vacant, previously developed land, located within Land Lot 51 of the 14^{h} District, Fulton County, Georgia. The Project Site is referenced by the address of 141 Piedmont Avenue and is located to the east of Piedmont Avenue, to the south of Ellis Street, to the west of Jesse Hill Jr. Drive, and to the north of John Wesley Dobbs Avenue. A copy of the property description and tax map is included in Appendix A. The location of the Project Site is illustrated on Figure 1.

When acquired by Applicant, Piedmont/Ellis, LLC ("Piedmont/Ellis"), an affiliate of the Georgia State University Foundation, on December 16, 2002, the Project Site was developed with the former Beaudry Ford facility, which was an automotive sales and service facility. Two single story cinder block buildings were present on the Project Site along with a multistory parking deck/facility building. All site structures were subsequently demolished.

Redevelopment plans for the Project Site include the construction of a multi-story dormitory complex for Georgia State University. This complex will include a multi-story parking deck located at the lower levels with open air. Significant excavation will be required for site preparation.

Facility Background

The Project Site was developed with residential and commercial structures from 1899 through development of the Beaudry Ford facility structures in the 1960s. The former Beaudry Ford property was purchased by Applicant from Ford Motor Credit on December 16, 2002. Known historical commercial operations at the Project Site prior to such purchase included a filling station and a dry cleaning facility, from about 1932 until 1962. Underground storage tanks (USTs) were apparently removed from the Project Site prior to the existing development. The most recent site structures, consisting of the Beaudry Ford facility, were constructed on the Project Site by 1972.

Numerous subsurface investigations have been conducted at the Project Site since 2002. Figure 2 shows the location of investigation borings at the Project Site. During those assessments soil and groundwater impacts were detected, which were reported to the Georgia Environmental Protection Division's (EPD's) Underground Storage Tank Management Program (USTMP) and Hazardous Sites Response Program (HSRP). The USTMP issued two "No Further Action" (NFA) letters for the impacts associated with the USTs. In addition, for releases of tetrachloroethene (also known as perchloroethylene, perc, or PCE), the HSRP has issued two letters stating that "the site will not be listed on the Hazardous Site Inventory (HSI)" (hereinafter referred to as a non-listing letter) under HSRA for either groundwater or soil impacts based upon the conditions existing with respect to the Site at the time of such letters.

On July 1, 2005, Piedmont/Ellis submitted an application and VCAP to EPD under the limitation of liability provisions of the Brownfields Act. Since EPD's approval of the VCAP on July 5, 2005, additional soil sampling has been conducted at the site to further assess potential impacts in the proposed courtyard area and former Beaudry Ford service area. This sampling was performed at the suggestion of EPD. These investigations verified that the previous identification of lead in certain lenses of dark colored soil was above the Type 1 RRS and below the Notification Concentration (NC) for lead under HSRA. Mercury was also found at concentrations above the Type 1 RRS and below the NC for mercury in the area of the proposed courtyard. Later samples taken in the course of excavation revealed the existence of silver and arsenic above the Type 1 RRS and below the NC for silver and arsenic in the area of former soil boring D-1.

SOURCE DESCRIPTION

PCE

The Project Site has historically been developed with a dry cleaners, a filling station, and an automotive sales and repair facility, as well as other possible commercial users. The area of the PCE detection in soil was located in the area of the southeastern portion of the former dry cleaners facility. Possible USTs were shown in this area on the 1931 Sanborn Fire insurance map. Therefore, this former dry cleaners is a potential source for the PCE impacted soils. The name of the dry cleaners was Excelsior Laundry.

Beaudry Ford also previously operated at the Project Site. Historic operations in the area of the detected PCE soil release apparently included automobile repairs. Hydraulic lifts were present in this area. A concrete patch was present between the two borings with the highest concentrations of PCE. This patch may be indicative of a former work-pit. Due to the automotive repair operations in this area, these operations could also be considered a potential source for the PCE impacted soils.

The location and nature of the site would have also made the Project Site suitable for other commercial users, especially between the times in which the Project Site was owned by the dry cleaners and prior to the location of the automobile dealer on the Project Site. Therefore, the source of the PCE release is unknown, although it could be one of the former known or unknown occupants of the Project Site.

Other Chemicals

Other chemical impacts in the form of certain VOCs and SVOCs (aka "Other Chemicals") were detected in soils at several areas of the Project Site. As noted above, the Project Site has historically been developed with a dry cleaners (Excelsior Laundry), a filling station (Atlanta Alignment Services), and an automotive sales and repair facility (Beaudry Ford) as well as other possible commercial users. All of these operations are potential sources for the other impacts present. The area of the free product detection was in the area of the aforementioned former dry cleaners USTs. Therefore, that facility is a potential source for the free product. Further, the petroleum release detected in groundwater at the southwestern portion of the Project Site may

have been the result of releases from an off-site LUST facility (current Shell Station listed as BP number 24023, located at 158 John Wesley Dobbs Avenue (Shell acquired BP)). Therefore, this facility is also considered a potential source for groundwater impacts.

The locations of the potential source areas are illustrated on Figure 3. Previous boring locations are shown on Figure 2. Figure 4 shows the area topography, from the United States Geologic survey (USGS) topographic map.

Metals

Elevated concentrations of certain metals, including lead, mercury, silver, and arsenic were detected in certain soils at the Project Site. The areas of these detections were confined to lenses of dark colored fill soils. The source of these constituents is unknown, but was likely within the fill materials when placed at the Project Site.

BROWNFIELD ELIGIBILITY

Site Eligibility

Preexisting Release

Evidence of the release of hazardous substances prior to Applicant's acquisition of the Project Site on December 16, 2002 (and prior to the BoR's prospective acquisition of the Project Site), has been discovered. These releases were previously reported to the USTMP and HSRP as discussed above, with no further action and non-listing letters being issued by GAEPD in response to those notifications.

Liens

No environmental liens have been identified against the property.

Regulatory Status

The Project Site is not listed on the HSI. It is not listed on the National Priority List (NPL). Nor is it under investigation pursuant to any other federal program, including the Resource Conservation and Recovery Act (RCRA). The property is not a hazardous waste facility and is not performing corrective actions pursuant to RCRA, the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), or any other federal program.

Piedmont/Ellis Eligibility

Contributor to Release

The releases at the Project Site date to the period prior to its purchase by Piedmont/Ellis on December 16, 2002. Piedmont/Ellis and its affiliates did not own or operate the Project Site prior to December 16, 2002, and they have not otherwise caused or contributed to such releases. The

Project Site has not been operated by Piedmont/Ellis or its affiliates since the time of its acquisition, with the exception of the recent conduct of demolition and remediation activities.

Affiliation

Piedmont/Ellis is not a subsidiary, division, parent company, or partner of the former owners or operators of the Project Site. There is not an employee relationship between these parties, either now, or at any time in the past. Nor is there any real, financial or employee relationship between Piedmont/Ellis and the former property owners or operators of the Project Site.

Violations

Piedmont/Ellis is not in violation of any orders, judgment, statues, rule, or regulation subject to the authority of the director of EPD.

Acquisition

Piedmont/Ellis acquired the property on December 16, 2002, from Ford Motor Credit. This was after July 1, 2002 and before July 1, 2005. Thus, this Application is timely under the provisions of the amendment of the Brownfields Act under Senate Bill 277 (SB 277).

BoR Eligibility

Contributor to Release

The BoR is not a current or former subsidiary, division, parent company, partner, employer or former employer and has not otherwise been affiliated with any person who has contributed or is contributing to a release at the property.

Affiliation

The BoR does not fall within the definition of "person who has contributed or who is contributing to a release" of regulated substances at the Property in that it is not the current owner or operator; it did not own or operate the facility at the time of disposal; it did not arrange for disposal; and it did not transport any regulated substances to the site.

Violations

To the BoR knowledge, it is not in violation of any order, judgment, statute, rule of regulation subject to the enforcement authority of the Director of EPD.

Other Criteria

The BoR meets such other criteria as has been established by the Board pursuant to O.C.G.A. δ 12-8-203.

SUBSURFACE INVESTIGATIONS

Numerous subsurface investigations have been conducted at the Project Site since 2002. These investigations included a hydraulic lift assessment by Golder Associates (Golder) in July 2002, a Limited Phase II Environmental Assessment by Clayton Group Services (Clayton), report dated August 14, 2002, and a Phase II Environmental Assessment and a Supplemental Phase II Environmental Assessment by United Consulting, reports dated January 5 and January 19, 2005, respectively. Additional soil and groundwater samples were taken by United Consulting on May 12, 13, and 23, 2005, for the preparation of the previous VCAP. In addition, as suggested by the EPD, additional soil data was collected in the proposed courtyard area and within the former Beaudry Ford service area.

Golder's assessment included advancing 35 borings adjacent to automotive lifts and 2 borings adjacent to a former UST. The soil samples were tested for total petroleum hydrocarbon-diesel range organics (TPH-DRO). Nine samples were also tested for polynuclear aromatic hydrocarbons (PAHs). TPH-DRO and PAH analysis was conducted by United States Environmental Protection Agency (EPA) analytical testing methods 8015B and 8270C, respectively.

Various PAHs were detected in three samples, with one of those samples at AS-29 having four PAH constituents at concentrations in excess of a Type 1 RRS. Golder's analytical testing results are included in Table 1. The locations of its borings are illustrated on Figure 2.

Clayton's assessment included advancing 3 borings on the Project Site, which were converted into temporary groundwater monitoring wells, TW-1, TW-2, and TW-4. One well was in the area of the former dry cleaners (TW-1), one well was in the area of a former Beaudry Ford UST (TW-2), and one well was in the area of the former filling station (TW-4). One soil sample was obtained from each of these borings for analytical testing of TPH-DRO, TPH-gasoline range organics (TPH-GRO), volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs) by EPA testing methods 8015B, 8015, 8260B, and 8270C, respectively. One groundwater sample was obtained from each well for analytical testing of VOCs and SVOCs by the same respective EPA testing methods.

Acetone was the only VOC constituent detected in the soils, which was detected within the soil sample from TW-4. Various SVOC constituents were detected in the soil sample obtained from TW-2, primarily PAHs. Of the PAH constituents, only benzo(a)pyrene was at a concentration in excess of its Type 1 RRS. Groundwater analytical testing at TW-1 indicated the presence of PCE. Benzene, toluene, ethylbenzene, and xylenes (BTEX) and two related SVOC constituents were detected in groundwater in TW-4. Clayton's soil and groundwater analytical testing results are included in Tables 1 and 2, respectively. The locations of their borings are illustrated on Figure 2.

The first two assessments conducted by United Consulting included advancing 14 borings on the Project Site, which included D-1, D-2, D-3, C-2A, C-2AA, C-2B, C-2C, C-2D, C-9A, HA-1, and HA-2, and three associated offset borings; D-1A, D-1B, and HA-2A. Eight of these borings, including D-1B, D-2, D-3, C-2AA, C-2B, C-2C, C-2D, C-9A, were converted into temporary

groundwater monitoring wells. From these borings, 24 soil samples were submitted for analytical testing. The soil samples were submitted for various analytical testing including TPH-DRO, TPH-GRO, VOCs, chlorinated VOCs (CVOCs), and/or RCRA metals. One soil sample, that was obtained directly adjacent to the soil sample with the greatest concentration of PCE, was also submitted for analytical testing of CVOCs using the Toxicity Characteristic Leaching Procedure (TCLP). Groundwater samples were obtained from three wells, consisting of D-1B, D-2, and D-3, for analytical testing of VOCs. The remaining five wells, consisting of C-2AA, C-2B, C-2C, C-2D, and C-9A, were not sampled at that time. Soil analytical testing indicated the presence of various RCRA metals, PCE, and isopropylbenzene; although only PCE and lead were detected at a concentrations in excess of their HSRP NCs and/or Type 1 RRSs. Groundwater analytical testing did not indicate the presence of VOC constituents in the samples obtained. These soil and groundwater analytical testing results are included in Tables 1 and 2, respectively. The locations of their borings are illustrated on Figure 2.

Additional soil, groundwater, and air samples were taken by United Consulting on May 12, 13, and 23, 2005, in order to complete soil and groundwater impact extent assessment and to assess possible other areas of impacts. This additional assessment included:

- Advancing nine borings for soil and/or groundwater sampling, consisting of EB-1 through EB-9, and four associated offset borings at EB-4A, EB-4B, EB-5A, and EB-5B;
- Sampling groundwater from five (5) existing wells consisting of C-2AA, C-2B, C-2C, C-2D, and C-9A;
- Obtaining three (3) monitoring well air column samples at C-2AA, C-2B, and C-2C; and
- Obtaining one (1) room air sample at AS-1 prior to demolition of the previous structure.

The locations of these borings and sample locations are illustrated on Figure 2.

From these borings, 8 soil samples were tested for VOCs, PAHs, and/or RCRA metals, and 5 groundwater samples tested for VOCs and/or PAHs. The groundwater samples from the five existing monitoring wells were also submitted for analytical testing of VOCs and/or PAHs. All air samples were submitted for analytical testing of VOCs.

Soil analytical testing indicated the presence of various RCRA metals and acetone, with none of the concentrations being greater than their respective NCs or Type 1 RRS. Groundwater analytical testing indicated the presence of 1,2-dichlorobenzene, benzene, cyclohexane, ethyl-benzene, isopropylbenzene, methylcyclohexane, methyl tert-butyl ether (MTBE), xylenes, 1,2-dichloroethane, and PCE. Free product was also detected in one monitoring well, C-2B, with a measured thickness of approximately 8 inches on May 23, 2005. The elevation of the free product was at 968.61 feet msl, or 17.91 feet below the concrete slab. [Note that free product was not initially observed in this monitoring well on January 26, 2005 when the groundwater elevation was 965.87 feet msl]. Analytical testing of this free product indicated the presence of isopropylbenzene, xylenes, and methylcyclohexane. These soil and groundwater analytical testing results are included in Tables 1 and 2, respectively.

Well column air sampling indicated the presence of benzene, toluene, and xylenes in the sample obtained from C-2B. This sample also had methylene chloride (MC) and vinyl chloride (VC)

reportedly detected, and the sample from C-2AA also had MC reportedly detected. However, the analytical testing laboratory did further analysis of these samples and determined that those detections were false positives. A description of this laboratory verification analysis is described on the laboratory Case Narrative. A room air sample did **not** indicate the presence of VOC constituents. These air analytical testing results are included in Table 3.

As suggested by the EPD, additional subsurface investigations were conducted at the Project Site to further assess potential impacts. Fourteen borings (CYB-1 through CYB-5 and SAB-1 through SAB-9) were advanced and 20 soil samples were submitted for analytical testing of RCRA metals, VOCs, and SVOCs. The locations of these borings and sample locations are illustrated on Figure 2.

Limited concentrations of various constituents were detected in some of the samples submitted for testing. Five constituents were identified, which were not previously identified in the soil at the Project Site. These included methylcyclohexane and methyl tert butyl ether (both VOC constituents), and 1,1-biphenyl, dibenz(a,h)anthracene, and dibenzofuran (SVOC constituents). One boring (SAB-5) had concentrations of various SVOC constituents above the NCs and Type 1 RRS. This boring was located in the former service area, with a sample depth of about 2 to 4 feet bgs.

Two borings (CYB-1 and CYB-5) had concentration of lead and mercury above the Type 1 RRS, but below the NCs. These borings were located in the courtyard area, with sample depths of about 1 to 3.5 feet bgs. Both of these borings had small amounts of dark colored soils, as can be seen on the respective boring logs. The soil analytical testing results are included in Table 1.

The pumping test well (PW-1) for the dewatering analysis at the Project Site, as discussed in the Geologic and Hydrogeologic section of this report, was sampled for total and dissolved lead. Analytical testing of these samples did not indicate the presence of lead above the laboratory detection limits of 0.01 mg/L.

At the request of the Board of Regents (BoR), additional samples of the dark colored soils at the site, where elevated levels of lead and mercury were previously detected, were obtained for analytical testing of these two compounds. These samples were obtained from the isolated lenses of dark colored soils in a vertical soil cut which extended from the area of D-1 in a north-south orientation to the northern property line. The samples were designated D-1 Metal, D-1 Metal A, and D-1 Metal B. Sample D-1 Metal was obtained from the direct area of the previous D-1 sample. Laboratory analysis of these samples indicated the presence of lead and mercury with concentrations ranging from 18 to 152 and non-detect to 0.511 mg/kg, respectively. The sample with the highest concentration of each compound, D-1 Metal A, which had lead and mercury concentrations of 152 and 0.511 mg/kg, respectively, was also tested for those compounds using the toxicity characteristic leaching procedure (TCLP). TCLP analysis did not indicate leaching concentration above the respective laboratory detection limits.

In addition to the lead and mercury samples, the BoR requested three soil samples from the areas of the previous hydraulic lifts for analytical testing of PCBs. These three samples were obtained from the areas with lifts with some of the highest TPH impacts, AS-9, AS-26, and AS-28. The

samples were obtained from about 10 feet below the existing grades, which are depths anticipated to be below the previous lift bases. Laboratory analysis of the samples obtained did not indicate the presence of PCBs above the laboratory detection limits.

Additional soil sampling was conducted in association of the implementation of the VCAP. The results of such sampling is reported herein.

United Consulting boring and monitoring well logs are included in Appendix B. United Consulting laboratory analytical testing results are included in Appendix C. Sampling locations are shown on Figure 2.

Sampling and Analysis Procedures/QA/QC

During the assessments conducted by United Consulting, samples were collected for analytical testing based on potential signs of impacts from visual observations, odors, and organic vapor screening results using a Multi Rae Plus organic vapor monitor (OVM). Quality control (QC) procedures included cleaning, Chain-of-Custody maintenance, and the use of laboratory blank samples. The drilling rigs were cleaned prior to entering the Project Site. The sampling tools were washed with an Alconox/water solution between sampling locations. This cleaning was performed to reduce the potential for contaminating samples due to the drilling/sampling processes. Chain of Custody of the samples was maintained and documented. Chain of custody forms were developed in the laboratory with the sample containers and custody was passed from individual to individual to maintain control of the materials. As the custody of the samples passed from individuals, this was documented on the Chain of Custody forms. The chain of custody forms are reproduced in Appendices C and I with the laboratory analysis data. Further details on the procedures used in this investigation are discussed below. General standard operation procedures for investigations are included in Appendix J.

The soil samples were submitted for various analytical testing including TPH-DRO, TPH-GRO, VOCs, chlorinated VOCs (CVOCs), SVOCs, PCBs and/or RCRA metals by EPA testing methods 8015B, 8015, 8260B, 8260B, 8270C, 8082, and 6010B, respectively. Mercury analysis was conducted by EPA testing method 7471A. Samples for VOC analysis were collected by EPA sampling method 5035A. All samples collected by United Consulting were submitted for analytical testing of these constituent lists by these EPA testing/sampling methods, unless otherwise noted in this report. This constituent list was selected based on the known operation history of the Project Site.

Note that matrix interference was encountered in some samples. This is discussed in detail under the Excavation Inspection section, below.

CHEMICALS IDENTIFIED

Pre-acquisition chemical releases have been detected at the Project Site in soil and/or groundwater. Three distinct classes of chemicals have been identified which are addressed by disposal companies separately – metals, chlorinated solvents (primarily PCE), and other non-chlorinated organic chemicals (referred to as "Other Chemicals"). For purposes of the VCAP, as

amended, and this VCSR under the Brownfields Act and its limitation of liability provisions, the chemicals identified (CI) include:

arsenic,
barium,
chromium,
lead,
mercury,
silver,
acetone,
1,2-dichlorobenzene,
1,2-dichloroethane,
cis-1,2-dichloroethene,
2-butanone,
benzene,
cyclohexane,
ethyl-benzene,
isopropylbenzene,
methylcyclohexane*,
methyl tert-butyl ether*,
tetrachloroethene (PCE),
toluene,
trichloroethene,
xylenes,
1,1-biphenyl*,
2-methylnaphthalene*,
naphthalene,
acenapthylene,
anthracene,
benzo(a)anthracene,
benzo(a)pyrene,
benzo(b)flouroanthene,
benzo(ghi)perylene,
benzo(k)flouroanthene,
carbozole*,
chrysene,
dibenz(a,h)anthracene,
dibenzofuran*,
flouroanthene,
flourane,
indeno(123)pyrene,
phenanthrene,
pyrene.

* These constituents are currently not regulated under the HSRA.

SOIL IMPACT EXTENT

Overview

CI in soil at the Project Site, as described above, consisted of: arsenic, barium, chromium, lead, mercury, silver, acetone, benzene, ethyl-benzene, methyl tert-butyl ether, PCE, toluene, trichloroethene, xylenes, 1,1-biphenyl, 2-methylnaphthalene, naphthalene, acenapthylene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)flouroanthene, benzo(ghi)perylene, benzo(k)flouroanthene, chrysene, dibenz(a,h)anthracene, dibenzofuran, flouroanthene, flourane, indeno(123)pyrene, phenanthrene, pyrene. The locations of these constituent detections are illustrated on Figure 5.

Extensive sampling was performed at the site to assess the extent of the CI in soil, which included additional sample points in areas recommended by the EPD. From this data, a limited number of CI were located in the soil at concentrations above an applicable Type 1 or 2 RRS. These RRS exceedences were in the following areas: the soil PCE impacts were limited to an area on the northwest-central portion of the Project Site, other chemicals impacts were detected in three isolated areas of the Project Site, and lead and arsenic impacts were limited to an isolated area on the west-central portion of the Project Site. Figure 5 shows the areas with these chemical detections. The limits of these CI are described below.

Lateral Extent

PCE

The lateral extent of the PCE impacts was determined based on soil data from 14 borings and other soil samples taken in the course of excavation activities. This extent was based on below laboratory reporting limits (BRL) concentrations to the west, northwest, northeast, east, southeast, south, and southwest. Low concentrations of PCE remained at the northern-most boring, HA-1, which was near the property line. Figure 5 shows the PCE soil sampling data at the Project Site. Figure 6 shows the estimated lateral extent of PCE impacts and extent of PCE impacts greater than the Type 1 RRS.

Other Chemicals

The on-site extent of the other chemicals impacts has been evaluated. Property line delineation has been demonstrated to the west, east, and south. Figure 5 shows the other chemical soil sampling data at the Project Site. Figure 7 shows the estimated lateral extent of these impacts and extent of impacts greater that the Type I RRS.

Metals

Lead was detected in one soil sample (D-1 at 10 feet below the existing grade) above its Type 2 RRS. Concentrations greater than the Type 2 RRS were not detected in the remaining 31 samples submitted for analytical testing of lead. Therefore, the extent of lead impact over the Type 2 RRS has been determined to be localized in this one isolated area. Figure 7 shows the estimated extent of lead impacts in excess of the Type 2 RRS. Verification sampling following excavation of this area revealed concentrations of silver below its Type 2 RRS and concentrations of Arsenic above its Type 1 RRS. Concentrations greater than the Type 2/Type1 RRS for these constituents, respectively, were not detected in the remaining samples submitted for analytical testing of these constituents. Therefore, the extent of these impacts over the Type 2/Type 1 RRS have been determined to be localized in this one isolated area. Figure 7 shows the estimated extent of lead/silver and arsenic impacts in excess of the Type 2/Type 1 RRS, respectively.

Vertical Extent

PCE

In the area with PCE impacts, the vertical extent was investigated within the zone of aeration. Where the excavations for corrective action extended to groundwater, which was within the total 45 by 100 foot excavated area, PCE delineation was conducted with sidewall samples. Based on this data, vertical extent of these impacts generally extended to depth of about 18 feet below the existing grades, where groundwater was encountered.

Other Chemicals

Other chemicals impacts have been detected in soils at depths from about 4 to 8 feet below the existing grades. Vertical extent in the area of the soil excavation, where concentrations were greater than the applicable RRS, for these compounds was demonstrated through base sampling. Based on this data, vertical extent of these impacts did not extend below a depth of about 10 feet. However, two compounds, 2-methylnaphthalene and naphthalene were detected in the groundwater in two different locations at the Project Site. The detection of 2-methylnaphthalene was on the southwestern corner of the Project Site, where impacts are believed to be entering the site from an off site source (an adjacent LUST facility). The detection of naphthalene was in the area of the free product. Therefore, Other Chemical impacts may have extended to groundwater in the soil in other areas not tested.

Approximately 8 inches of free product (i.e. potential source material) was detected/measured in monitoring well C-2B on May 23, 2005. Soil analytical testing in this area initially only included PCE or other CVOCs. During drilling operations in this area, possible chemical odors were observed at borings C-2A and C-2B from the surface to the boring termination depths and from about 2 to 3 feet below the existing grades to the boring termination depths at HA-2A and C-2AA. Elevated CVOCs concentrations were not detected in these areas. The free product and odors were determined to be indicative of other potential chemical impacts in this area, which may have extended from near the ground surface to groundwater. Analytical testing of the free product and soils near the groundwater table indicated that these materials may be indicative of old petroleum or mineral spirits. The compounds detected in the free product included certain CIs.

Metals

The elevated detection of lead at D-1 above the Type 2 RRS was identified in a sample taken 10 feet below the existing grade in that area. Based on the lead analytical testing at the site, the extent of the lead impact at this area was estimated to be confined to the 2-foot thick layer of dark colored soils, which extended from about 9 to 11 feet below the existing grade. Verification sampling in the course of excavation revealed elevated detections of arsenic above the Type 1 RRS in this layer as well.

GROUNDWATER IMPACT EXTENT

Overview

CI found in groundwater at the Project Site consist of 1,2-dichlorobenzene, 1,2-dichloroethane, benzene, cyclohexane, ethyl-benzene, isopropylbenzene, methylcyclohexane, methyl tert-butyl ether, PCE, toluene, xylenes, 2-methylnaphthalene, and naphthalene. The locations of these constituent detections are illustrated on Figure 9. Groundwater depths in the monitoring wells at the Project Site have varied from about 15 to 31 feet below the existing grades. Groundwater depths are greatest on the western portion of the Project Site, where ground surface elevations are the highest.

Geologic and Hydrogeologic Setting

The topography, geology and hydrogeology commonly control the migration of chemicals release at a site/facility. The relative location of the properties will often define their potential interaction and hydraulic connection. The description of the setting for the Project Site is provided below, starting with the topography and geology. The resultant anticipated, surface water and groundwater flow directions are then estimated and described.

The Project Site is located in the Piedmont Physiographic Province of Georgia, which is characterized by medium- to high-grade metamorphic rocks and scattered igneous intrusions. Topography in the province is variable and ranges from gently rolling hills in the south to moderate to steep hills in the north. Based on the United States Geological Survey (USGS) 7.5-minute topographic quadrangle map of the area entitled northwest Atlanta, GA, 1997, elevations in the vicinity of the Project Site ranged from approximately 980 feet above mean sea level (ft msl) to approximately 1,190 ft msl. The Project Site was located in an area of gently rolling hills. Topography at the Project Site generally slopes down to the east towards storm water catch basins located throughout the area, offsite. Surface water flow at the Project Site and immediate vicinity generally flows east. This area topography is illustrated on the USGS map included as Figure 4.

The metamorphic rocks comprising the Piedmont Physiographic Province were formed when older "parent" rocks were subjected to high temperatures and/or pressures during regional metamorphism that occurred during the creation of the Appalachian Mountains. The same high temperatures and pressures also caused some "parent" rocks to fully melt and subsequently recrystallize as intrusive igneous rocks. According to the Geologic Map of Georgia, the rock types underlying the Project Site have been mapped as granite gneiss and amphibolite, which are highly metamorphosed rocks. Based on the various investigations conducted at the Project Site, the depth to partially weathered rock (PWR) and rock at the Project Site was documented during previous geotechnical exploration ranging from 35 to 63 and 43 to 70 feet below the existing grades, respectively.

In the Piedmont Physiographic Province the upper groundwater zone is located in residual soils, which is underlain by bedrock. Groundwater flow in the upper zone is generally unconfined and unfractured. This condition at the Project Site was demonstrated through the pumping test described below. Rock flow in this region is generally contained in joints, fractures and other openings in bedrock. Groundwater recharge occurs by seepage of water through the soil and/or rock or by flowing directly into openings in outcropping rock. The primary source of recharge water is from precipitation that falls in the area, but can also originate from river discharge during dry periods. The movement of groundwater typically follows the original surface topography, moving from hilltops and uplands to stream valleys. The water table is generally 30 to 100 feet below the ground surface on hilltops and hillsides, but is at or near the ground surface in stream valleys and draws. In this type of geologic setting, the direction of groundwater flow can be anticipated to generally conform to that of the surface water.

Monitoring wells D-1B through D-3, C-2AA, C-2B through C-2D, and C-9A, which were installed by United Consulting, were surveyed to provide data for evaluating groundwater flow directions. The wells were surveyed to the nearest 0.01-foot relative to each other. The reported monitoring well elevations were reduced from a reported land surveyor elevation located about 20 feet to the north of monitoring well D-1B, which was at about the same elevation as the ground surface at D-1B (1003.4). Therefore, all reported elevations were calculated from this ground surface elevation. The monitoring well elevations were obtained at the top of the casing (T.O.C.) of the well pipes. Ground surface elevations were also obtained adjacent to each well pipe. All reported elevations should be considered approximate. Relative elevations are summarized in Table 4.

Groundwater depth measurements were conducted at all monitoring wells on January 26, 2005, using a Solinst Water Level Meter. The depths to groundwater ranged from 15.34 to 34.08 feet below the top of the well casings. This large depth variation is due, in part, to the large variation in the ground surface at the Project Site, as illustrated on Figure 2. Water level measurements and survey data were used to calculate groundwater elevations, as indicated in Table 4. These elevations were used to construct a potentiometric map, which is included as Figure 8.

Based on the aforementioned potentiometric map, Figure 8, groundwater elevations in the on-site monitoring wells ranged from 965.14 to 972.25 feet. Groundwater flow has been calculated as flowing to the east, with points of equal elevation generally being located in a north to south orientation. This direction of groundwater flow is consistent with the topography of the area. The topography of the Project Site and the surrounding area is shown in Figure 4.

An 8-hour pumping test was also performed at the Project Site to characterize groundwater movement. The test included one fully penetrating, 4-inch diameter pumping well, and two 2-inch diameter monitoring wells. The system was pumped for 8 hours at 1.46 gallons per minute (gpm). The test was analyzed using the Theis methodology as a uniform, homogeneous, unconfined aquifer. The monitoring wells, which were placed in orthogonal directions and as different distances from the pumping well, responded almost identically, such that these conditions are applicable to the Project Site. From the Theis analyses of the well response data, the estimated hydraulic parameters for he system are:

Calculated Hydraulic Parameters

Well No.	Maximum Draw-Down (ft)	Transissivity (ft^2/min)	Storativity (ft^3/ft^3)
OW1	0.797	0.066	0.0029
OW2	0.713	0.076	0.0020
Notes: Pumping test 7/6/05, using PW-1 pumped at 1.46 gpm for 8.9 hours			

Several other characteristics of the system are that it is:

- Unconfined;
- Uniform;
- Relatively extensive;
- Isotropic; and
- About 40 feet thick (maximum)

With an average transmissivity of 0.07 ft^2/minute and an aquifer thickness of 40 feet, the hydraulic conductivity is about $1.75x10^{-3}$ ft/min. This permeability is about $8.8x10^{-4}$ cm/s. This is generally consistent with the Hazen approximations of $3.6x10^{-4}$ cm/s (from samples obtained in the screen interval of the monitoring wells), and is a good data match.

Lateral Extent

The estimated lateral extent of the groundwater impacts has been based on groundwater data from 11 wells, including TW-1, TW-2, TW-4, D-1B, D-2, D-3, C-2AA, C-2B, C-2C, C-2D, and C-9A, and 5 borings, including EB-1 through EB-3, EB-5, and EGB-9.

PCE

PCE groundwater impact has been assessed interior to the Project Site and to the property lines. PCE was detected in the groundwater within one monitoring well, TW-1, and one boring, EB-3. Both of these sample locations were located near the northern property lines. Based on this data, PCE impacts to groundwater are limited to the north-northwestern portion of the Project Site. Delineation has been demonstrated to the east, south, and southwest, along the property lines. Impacts may extend off-site to the north. Figure 10 shows the estimated lateral extent of PCE impacts in the groundwater.

Other Chemicals

Other Chemicals impacts to groundwater consist of 1,2-dichlorobenzene, 1,2-dichloroethane, benzene, cyclohexane, ethyl-benzene, isopropylbenzene, methylcyclohexane, methyl tert-butyl ether, PCE, toluene, xylenes, 2-methylnaphthalene, and naphthalene. Other Chemicals impacts to the groundwater have been assessed interior to the Project Site and to the property lines. Impacts were detected in the groundwater within four monitoring wells, TW-4, C-2AA, C-2B, and C-2D, and within three (3) borings, EB-2, EB-3, and EB-5B. Based on this data, Other Chemicals impacts are limited to the southwestern corner of the Project Site (where it is believed to have migrated from off-site), and to the north-central and northeastern portions of the Project Site. Delineation has been demonstrated to the west, northwest, south, and southeast along the property lines. Impacts may extend off-site to the north and northeast. Figure 11 shows the estimated lateral extent of Other Chemical impacts in the groundwater.

Free product was also previously detected in one monitoring well, C-2B, with a measured thickness of approximately 8 inches. Analytical testing of the free product and soils near the groundwater table indicated that these materials may be indicative of old petroleum or mineral

spirits. The compounds detected in the free product included certain CIs. This free product was delineated to the west, south, and east by C-2C, C-9A, and C-2D, respectively. During excavations at the Project Site, free product was removed from this area by digging approximately 2 feet below the groundwater table and removing the soils with free product lodged in the pore space. Verification of the removal of free product was conducted through visual observations and soil sampling, as documented in the Excavation and Disposal section below. Figure 11 also shows the estimated lateral extent of the free product on the groundwater.

Vertical Extent

The vertical extent of groundwater impacts was not assessed with deep monitoring wells. However, with one exception, the CIs in groundwater at the Project Site have specific gravities less than water, so deep impacts would not be expected. One CI, PCE, has a specific gravity greater than water and has the potential to sink in the groundwater. However, the concentrations of PCE were very low (1.6 and 8.2 ug/L) compared to its solubility limit of 206,000 ug/L. Therefore, sinking of PCE is unlikely. Further, the depth to partially weathered rock (PWR) and rock at the Project Site was documented during a previous geotechnical exploration ranging from 35 to 63 and 43 to 70 feet below the existing grades, respectively. Due to the type of groundwater impacts and their concentrations, groundwater impacts below these depths are not anticipated.

POTENTIAL HUMAN OR ENVIRONMENTAL RECEPTORS

Currently, the nearest resident to the Project Site is less than 300 feet to the south of the Project Site, at Bethel Tower Apartments. Upon completion of the planned development, residents will be located on the Project Site. However, verification sampling has confirmed the removal of soils with CI concentrations in excess of the Type 1/Type 2 RRS. Further, the Project Site will be entirely covered with buildings, asphalt, or concrete.

The EPD previously assessed the Project Site for a known release of PCE to the groundwater, which included conducting a receptor survey. In addition, the consultant conducting the notification provided an independent survey. Based on file information, no drinking water wells exist within 3 miles of the Project Site.

RISK REDUCTION STANDARDS

Approach

Type 1 RRS calculations have been made for the CI in the soil at the Project Site. Type 2 RRS have also been calculated for arsenic, lead, mercury, and silver. The RRS were developed based on guidance and the rules for the HSRP, as well as applicable guidance from the EPA (1991, 2001). The RRS values calculated in this report incorporate standard, default assumptions recommended by EPD and EPA. See, HSRA Rule 391-3-19-.07(6)(c). Generally, Type 1 and 2 soil RRS shall be based on the lowest of groundwater protection criteria, non-cancer toxic effect concentrations, or carcinogenic risk concentrations for residential receptors. Specific calculations for lead were also required under the Type 2 RRS.

Non-cancer toxic effect concentrations and carcinogenic risk concentrations were assessed using equations 6 and 7, shown below, from Risk Assessment Guidance for Superfund (RAGS), Volume I - Human Health Evaluation Manual, Part B (1991).

Carcinogenic Risk RRS (RRS_c) in milligrams per kilogram (mg/kg):

$$RRS_c = \frac{TR*BW*AT_c*365\ days/yr}{EF*ED*[(CSF_o*10^{-6}\ kg/mg*IR_s)+(CSF_i*IR_a*[1/VF+1/PEF])]}$$

Non-carcinogenic Risk RRS (RRS_{nc}) in mg/kg:

$$RRS_{nc} = \frac{THI*BW*AT_{nc}*365\ days/yr}{EF*ED*[(1/RfD_o*10^{-6}kg/mg*IR_s)+(1/RfD_i*IR_a*[1/VF+1/PEF])]}$$

Where:

TR	Target Risk	1.00E-05
THI	Target Hazard Index	1 (unitless)
CSF_i	Inhalation Cancer Slope Factor	Chemical Specific
CSF_o	Oral Cancer Slope Factor	Chemical Specific
RfD_i	Inhalation Reference Dose	Chemical Specific
RfD_o	Oral Reference Dose	Chemical Specific
BW	Body Weight	70 kg
AT	Averaging Time	70/30* yr: Eq 6/Eq 7
EF	Exposure Frequency	350 days/yr
ED	Exposure Duration	30 yr
IR_{soil}	Soil Ingestion Rate	114 mg/kg
IR_{air}	Workday Inhalation Rate	15 m^3/day
VF	Soil to Air Volatilization Factor	Chemical Specific
PEF	Particulate Emission Factor	4.63E+09 m^3/kg

Note: Parameters per HSRA, Table 3, Appendix III and RAGS, Volume I, Part B, except * value, which was verbally specified by EPD on 9/1/05.

Type 1 RRS

Groundwater protection criteria were assessed as the highest of the concentrations in Appendix I of the Rules, multiplication of the Type 1 groundwater concentration criteria by a factor of 100, or demonstration of the protection of groundwater quality through Toxicity Characteristic Leaching Procedure (TCLP) analysis. TCLP analysis was performed on the soil sample with the highest PCE concentration during the Supplemental Phase II Environmental Assessment.

Default values were used as obtained from the standard residential exposure assumptions, Table 3, Appendix III of the HSRP Rules. Chemical specific values were obtained from the Region 9

PRG Table and other sources[1]. Type 1 risk based soil RRS calculations are included as Table 5. Final Type 1 soil RRS are summarized in Table 1.

Type 2 RRS

Lead

Type 2 RRS for lead was assessed by calculating equation 4-10 of the Supplemental Guidance for Soil Screening Levels for Superfund Sites (SGDSSL) and running the Integrated Exposure Uptake Biokinetic Model for Lead in Children (IBEUK) model. The final Type 2 RRS is the lower of these two concentrations.

Equation 4-10 of the SGDSSL was run using EPA default values, including an EPA default K_d value of 900 L/kg (from Oak Ridge). In addition, due to the distribution of the lead impacts, the impact area is believed to be less than 0.5 acres, so a DAF of 20 can be used.

Equation 4-10:

$$SSL = C_w[K_d+(O_w+O_a(H)/P_b)]$$

Where:

SSL	Soil Screening Level	mg/kg
C_w	Target Soil Leachate Concentration	0.015 mg/L or 0.3 with DAF of 20-Chemical Specific
K_d	Soil-Water Partition Coefficient	900 L/kg-Default
O_w	Water Filled Soil Porosity	0.3 L/L-Default
O_a	Air Filled Soil Porosity	0.134 L/L (n-O_w)
n	Soil Porosity	0.434 L/L (1-P_b/P_s)
P_b	Dry Soil Bulk Density	1.5 kg/L-Default
P_s	Soil Particle Density	2.65 kg/L-Default
H	Dimensionless Henry's Constant	0

So:

SSL=0.3mg/L[900L/kg+(0.3L/L+0.134L/L(0))/1.5kg/L]

SSL=270 mg/kg

[1] Supplemental Guidance to RAGS: Region 4 Bulletins, Human Health Risk Assessment Bulletins, EPA Region 4, originally published November 1995, http://www.epa.gov/region4/waste/ots/healtbul.htm (Website last updated May 30, 2000), Superfund Chemical Data Matrix (EPA, Jan 2004) http://www.epa.gov/superfund/sites/npl/hrsres/tools/scdm.htm, and Water9 (EPA wastewater treatment modeling program) http://www.epa.gov/ttn/chief/software/water/

The IBEUK model was run using site specific data and EPA default values. A groundwater sample from the site did not show lead above the laboratory detection limit of 0.01 mg/L. Discussions with the lab also indicated that lead was not present below this concentration. In the model, as a conservative approach, a concentration of 10 ug/L was used (the EPA default is 4). Using this data and EPA defaults, a concentration of 290 mg/kg was determined to have a probability of no greater than 5% of a blood level greater than 10 ug/L. The IBEUK model is included in Appendix D.

Based on these calculations, the final Type 2 RRS is 270 mg/kg. Final Type 2 soil RRS are summarized in Table 1.

Mercury

Type 2 RRS for mercury was assessed by calculating equation 4-10 of the SGDSSL and equations 6 and 7 from the RAGS, Volume I. These equations are shown above.

Equation 4-10 of the SGDSSL was run using EPA default values, as shown below. In addition, due to the distribution of the mercury impacts, the impact area is believed to be less than 0.5 acres, so a DAF of 20 can be used.

SSL	Soil Screening Level	mg/kg
C_w	Target Soil Leachate Concentration	0.002 mg/L or 0.04 with DAF of 20-Chemical Specific
K_d	Soil-Water Partition Coefficient	52 L/kg-Default
O_w	Water Filled Soil Porosity	0.3 L/L-Default
O_a	Air Filled Soil Porosity	0.134 L/L ($n-O_w$)
n	Soil Porosity	0.434 L/L ($1-P_b/P_s$)
P_b	Dry Soil Bulk Density	1.5 kg/L-Default
P_s	Soil Particle Density	2.65 kg/L-Default
H	Dimensionless Henry's Constant	0.467

So:

SSL=0.04mg/L[52L/kg+(0.3L/L+0.134L/L(0.467))/1.5kg/L]

SSL=2.09 mg/kg

Equations 6 and 7 from the RAGS, Volume I were calculated for various types of mercury [Mercury and Compounds, Mercury (elemental), and Mercury (methyl)] using default EPA values as provided in the EPA Region 9 PRG table and other sources[1]. These equations are shown above. The calculations are included as Table 6. Due to the unavailability of several variables, the equations were altered to exclude those portions of the equations where the variables did not exist. This was conducted at the direction of Jim Brown. As such, equation 6 could not be conducted, due to the lack of sufficient variables. Equation 7 yielded concentrations ranging from 149 to 14,100 mg/kg for the various types of mercury.

The final Type 2 soil RRS is the lowest of groundwater protection criteria, non-cancer toxic effect concentrations, or carcinogenic risk concentrations for residential receptors. Therefore, for the Project Site, the final Type 2 RRS for mercury is 2.09 mg/kg. Final Type 2 soil RRS are summarized in Table 1.

Arsenic

Type 2 RRS for arsenic was assessed by calculating equation 4-10 of the SGDSSL and equations 6 and 7 from the RAGS, Volume I. These equations are shown above.

Equation 4-10 of the SGDSSL was run using EPA default values, as shown below. In addition, due to the distribution of the arsenic impacts, the impact area is believed to be less than 0.5 acres, so a DAF of 20 can be used.

SSL	Soil Screening Level	mg/kg
C_w	Target Soil Leachate Concentration	0.05 mg/L or 1.0 with DAF of 20-Chemical Specific
K_d	Soil-Water Partition Coefficient	29 L/kg-Default
O_w	Water Filled Soil Porosity	0.3 L/L-Default
O_a	Air Filled Soil Porosity	0.134 L/L ($n-O_w$)
n	Soil Porosity	0.434 L/L ($1-P_b/P_s$)
P_b	Dry Soil Bulk Density	1.5 kg/L-Default
P_s	Soil Particle Density	2.65 kg/L-Default
H	Dimensionless Henry's Constant	0

So:

SSL=1.0mg/L[29L/kg+(0.3L/L+0.134L/L(0))/1.5kg/L]

SSL=29.2 mg/kg

Equations 6 and 7 from the RAGS, Volume I were calculated for arsenic using default EPA values as provided in the EPA Region 9 PRG table and other sources[1]. These equations are shown above. The calculations are included as Table 6. Due to the unavailability of several variables, the equations were altered to exclude those portions of the equations where the variables did not exist. This was conducted at the direction of Jim Brown. Equation 6 yielded a concentration of 9.96 mg/kg. Equation 7 yielded a concentration of 448 mg/kg.

The final Type 2 soil RRS is the lowest of groundwater protection criteria, non-cancer toxic effect concentrations, or carcinogenic risk concentrations for residential receptors. Therefore, for the Project Site, the final Type 2 RRS for arsenic is 9.96 mg/kg. This concentration is below the Type 1 RRS of 20 mg/Kg for arsenic. Therefore, for the Project Site, the Type 1 RRS is being implemented as the cleanup standard for arsenic. Final Type 2 soil RRS are summarized in Table 1.

Silver

Type 2 RRS for silver was assessed by calculating equation 4-10 of the SGDSSL and equations 6 and 7 from the RAGS, Volume I. These equations are shown above.

Equation 4-10 of the SGDSSL was run using EPA default values, as shown below. In addition, due to the distribution of the silver impacts, the impact area is believed to be less than 0.5 acres, so a DAF of 20 can be used.

SSL	Soil Screening Level	mg/kg
C_w	Target Soil Leachate Concentration	0.1 mg/L or 2.0 with DAF of 20-Chemical Specific
K_d	Soil-Water Partition Coefficient	8.3 L/kg-Default
O_w	Water Filled Soil Porosity	0.3 L/L-Default
O_a	Air Filled Soil Porosity	0.134 L/L ($n-O_w$)
n	Soil Porosity	0.434 L/L ($1-P_b/P_s$)
P_b	Dry Soil Bulk Density	1.5 kg/L-Default
P_s	Soil Particle Density	2.65 kg/L-Default
H	Dimensionless Henry's Constant	0

So:

SSL=2.0mg/L[8.3L/kg+(0.3L/L+0.134L/L(0))/1.5kg/L]

SSL=17 mg/kg

Equations 6 and 7 from the RAGS, Volume I were calculated for silver using default EPA values as provided in the EPA Region 9 PRG table and other sources[1]. These equations are shown above. The calculations are included as Table 6. Due to the unavailability of several variables, the equations were altered to exclude those portions of the equations where the variables did not exist. This was conducted at the direction of Jim Brown. As such, equation 6 could not be conducted, due to the lack of sufficient variables. Equation 7 yielded a concentration of 7,470 mg/kg.

The final Type 2 soil RRS is the lowest of groundwater protection criteria, non-cancer toxic effect concentrations, or carcinogenic risk concentrations for residential receptors. Therefore, for the Project Site, the final Type 2 RRS for silver is 17 mg/kg. Final Type 2 soil RRS are summarized in Table 1.

CORRECTIVE ACTION

Overview

Investigations have substantially defined the impacts of CI to the soil and groundwater at the Project Site, as described above. The extent of PCE, arsenic, and Other Chemicals in soil at concentrations in excess of the Type 1 RRS as well as lead in excess of the Type 2 RRS were determined, and corrective actions have been taken which consisted of excavation and off-site disposal of such soils. Verification sampling was performed to demonstrate that the areas were excavated until CI in the soils were at concentrations less than the higher of the applicable Type 1 RRS or Type 2 RRS. In addition, based on prior vapor monitoring data, although not required to comply with the Brownfields Act or HSRA, a venting system has been designed for relief of any organic vapors that may arise from any residual chemicals that remain in the soil or groundwater underlying the northern area of the Project Site following the remedial activities described herein.

Regulatory Compliance

The soil removal operations for this project were performed in accordance with the VCAP, as amended. Excavation activities were performed by contractors experienced, trained, and licensed for hazardous waste activities. The materials removed from the Project Site were transported by experienced, trained, and licensed waste haulers. Manifests were prepared documenting the removal and disposal of the materials. All excavation, handling, containerization, transport, storage, and disposal activities were performed by methods that:

- Prevented contamination of the surrounding environment (soil, water, air);
- Were in accordance with applicable federal, state and local regulation and laws; and
- Protected personnel in the work area and adjacent to the work area.

The work was performed in compliance with applicable United States Occupational Safety and Health (OSHA) regulations, and in accordance with the project specific Health And Safety Plan.

Health and Safety

Work was performed in accordance with OSHA requirements, as provided for in Title 29 of the Code of Federal Regulations, part 120 (29 CFR 120), for hazardous waste work. All companies involved in the excavation activities prepared health and safety plans (HASPs) for their workers and the tasks they performed, as required by the VCAP and regulations, and cleaning protocols for their personnel and equipment. United Consulting prepared a HASP for air monitoring during the excavation process. A copy of this HASP is included in Appendix E.

Source Material and Soil Excavation and Disposal

General

Corrective action for the Project Site consisted of excavation and off-site disposal of source material and soils encountered with CI concentrations in excess of the higher of the applicable Type 1 or Type 2 RRS. Soil excavation operations were managed by Hardin Construction (Hardin), while the soil transportation and disposal operations were managed by Greenleaf Environmental Group, Inc. (Greenleaf).

Backfilling of the remediation excavations was accomplished using clean soil or soils from areas of the site that have been demonstrated through characterization sampling to be in compliance with Type 1 RRS for RCRA metals, VOCs, and SVOCs. Some of the on-site soils used for the backfill operations were from the sidewalls of the excavation pit, as noted below. Sampling of the sidewalls was conducted for VOCs at a rate of one sample for every 25 linear feet, as outlined in the VCAP. Six samples were also obtained from this area for analytical testing of SVOCs. Analytical testing of three samples from this area did not show elevated concentrations of RCRA metals. Off-site fill soil was also used which were demonstrated through characterization sampling to be in compliance with Type 1 RRS for RCRA metals, VOCs, SVOCs, and PCBs. Sampling included two samples from the proposed borrow area, as delineated by Hardin on August 11, 2005, which included an approximate 75 by 150 foot area.

All of the corrective actions were monitored and/or supervised by United Consulting, and United Consulting was responsible for the conduct of verification sampling and analysis of laboratory test results of such samples.

PCE and Free Product-Excavation Pit D

Concentrations of PCE in soil in excess of the Type 1 RRS of 0.5 mg/kg, had been assessed at the Project Site. Based on the analytical testing data, this area measured about 45 by 100 feet. Impacts in this area were determined to extend to groundwater, which was previously measured at about 18 feet below grade.

Excavation operations were conducted in this area from July 7 to August 10, 2005. Initial excavation consisted of removing approximately 10 feet of soils vertically from this 45 by 100 feet area. Due to the presence of an approximate 6.5 to 10 feet high retaining for the former Beaudry Ford facility building located about 16.5 to 26.5 feet to the north of the excavation, which also retained an approximate 6 to 8 feet high DOT retaining wall located about 3 to 13 feet north, excavations were ceased until temporary shoring could be installed. At that time, sidewall verification samples were obtained in the upper 10 feet of the excavation as outlined in the VCAP, and discussed below, to determine if additional excavations were required to the north, south, east, or west. Following the collection of each verification sample, which was conducted as excavations occurred, the sidewalls of the excavation were sloped for worker safety. Analytical testing did not indicate VOC impacts greater than the Type 1 RRS and additional lateral excavation in those directions were not determined necessary. Further, due to these testing

results, the soils removed from outside the excavation area for sloping were stockpiled on-site for future use as backfill materials.

Although VOC impacts greater than the Type 1 RRS were not encountered in these samples, the VOC quality control analysis indicated interference in two samples (SW-1 and SW-11). Odors were present in the soils in these areas, which smelled somewhat like turpentine. Based on review of the testing data by the analytical testing laboratory, this interference was likely caused by mineral spirits. Although the primary component of mineral spirits is trimethylbenzene, a compound unregulated by the HSRP and not on the SVOC compound list, the laboratory recommended testing the samples for SVOCs to determine if possible other associated compounds were present in the soils. From the SVOC analyses, only two compounds were found in one sample; 2-methylnaphthalene and naphthalene. 2-methylnaphthalene is not a HSRP regulated compound. The concentrations of these compounds were low and the concentration of naphthalene was below its NC and Type 1 RRS. Further discussions regarding these interferences are included in the Excavation Inspection section, below.

Following the excavation of the 45 by 100 foot area to a depth of 10 feet below the existing grades, heavy rains occurred at the site, which resulted in rainwater collecting in the excavation pit. No discoloration, sheen, or odors were detected in the rainwater. Two rainwater samples were collected from the excavation and tested for VOCs and SVOCs. No constituents were detected from these analyses. Therefore, these fluids were handled as construction related waters.

Temporary shoring was installed in the area of the excavation and along the aforementioned retaining wall between July 16 and July 21, 2005. Following this installation, excavation operations were again initiated on July 21, 2005. The excavation then began at the shoring wall, which was located about 17 feet north of the northern edge of the 45 by 100 foot area, and sloped down to the south to a depth of about 21 feet below the existing grades (an elevation of about 965.5 feet) starting at the northern edge of the planned excavation. This excavation depth was about 3.1 feet below the groundwater depth recorded when free product was previously observed at C-2B (at an elevation of about 968.61 feet). Although the sloped soils from the shoring wall to the excavation depth were outside the planned excavation area, these soils were also hauled off-site as impacted soils.

The excavation then continued to the south with a base width of 45 feet at an elevation of about 965.5 feet for a distance of about 66 feet. Due to the excavation being below the groundwater table in this area, sidewall verification samples were obtained at depth as described in the VCAP. Sidewalls were sloped for safety as the excavation progressed. The soils removed from a depth of 10 feet below the existing grades to the total excavation depth for sloping purposes was also hauled off-site as impacted soils. The excavation depth was raised about 3 feet to an elevation of about 968.5 feet for the remaining southern 33 feet of the total 100 foot excavation. This depth of excavation was based on previous soil and groundwater data in the area and the lack of free product in monitoring well C-2AA. Due to the excavation depth being at about the top of the groundwater table, sidewall verification samples were again obtained at depth as described in the VCAP. Sloping of the sidewalls was conducted throughout the remaining excavation, as described above.

The sidewall verification samples obtained from near the groundwater indicated Type 1 RRS exceedences of PCE in two samples, SW-15 and SW-16, which were located along the eastern wall of the excavation at the northeastern portion. Therefore additional excavation was conducted in this area. This area was excavated approximately 8 feet east a distance of about 30 feet in a north-south orientation. The excavation extended from about 10 feet below the grade to about 3 feet below the groundwater table. Three additional sidewall samples were then obtained. Analytical testing of these samples indicated PCE impacts greater than the Type 1 RRS at one location, the southern-most sample. Therefore, additional excavations were conducted in this area. An additional approximate 10 feet of excavation was conducted to the south of this area, with the same depths at lateral distance as described above. An additional sidewall sample was then obtained, which did not indicate the presence of PCE impacts greater than the Type 1 RRS. Therefore, excavations in this area to obtain compliance with the Type 1 RRS for PCE are complete.

Free product was detected in one monitoring well, C-2B, with a thickness of approximately 8 inches. Analytical testing of the free product and soils near the groundwater table indicated that these materials may be indicative of old petroleum or mineral spirits. The compounds detected in the free product included certain CIs. The elevation of the free product was at about 968.61 feet msl, or 17.91 feet below the former concrete slab. Free product was not initially observed in this monitoring well four months earlier when the groundwater elevation was about 965.87 feet msl. This indicated that the free product was lodged in the soil pore space at the elevation noted above. Free product was not observed in the other nearby monitoring wells. As such, free product in the excavations was limited to the area of C-2B. Specifically, the excavation extended at an elevation of about 965.5 feet (3.11 feet below the top of free product) for distance of 18 feet to the north, 30 feet east, 42 feet south, and 25 feet west of C-2B. The excavation remained open for a period of about 3 days for groundwater stabilization and condition observations. Free product was not observed entering the base or sides of the excavations following the removal efforts. Confirmation of the removal of free product was documented as discussed below.

Following confirmation of the removal of impacted soils above the Type 1 RRS, the excavation was backfilled. Flowable fill (a concrete mixture) was placed in the excavation to a depth approximately 1 foot above the groundwater table (969.5 feet). The soils from the upper 10 feet of the slope of the excavation were used for backfill. These soils did not have VOCs above the Type 1 RRS. Further, due to potential impacts from SVOCs, as referenced above, a soil sample was obtained from this stockpile (SP-1) for SVOC analysis. Analytical testing of that sample indicated the presence of numerous SVOC compounds, but at concentrations below the applicable Type 1 RRS. Clean off-site fill was also used, as noted above. The fill soils were placed in compacted lifts, which was monitored by an Engineering Technician.

Approximately 7,700 tons of impacted soils were removed from this area for off-site disposal. A total of 27 verification samples were obtained during the removal process. This included several areas that were excavated further and re-sampled. This sampling program showed that soils were removed laterally until the CI had concentrations below the RRS. The excavation was also extended to groundwater.

The area of excavation is illustrated on Figures 6 and 12. Verification sample locations are also illustrated on Figure 12. A cross section of the excavation is included as Figure 13.Photographs of the excavation are included in Appendix F.

Other Chemicals-Excavation Pits A through C

Concentrations of Other Chemicals in excess of the Type 1 RRS were assessed at the Project Site as described above. Based on the analytical testing data, the areas of soil impacts by Other Chemicals at concentrations greater than the Type 1 RRS were limited to three areas: near sample AS-29. (Pit A), near sample TW-2 (Pit B), and near SAB-5 (Pit C). Impact extents at each area were estimated as approximately 5 by 10 by 10 feet deep at Pit A (AS-29), 10 by 15 by 8 feet deep at Pit B (TW-2), and 8 by 8 by 8 feet deep at Pit C (SAB-5).

Excavation operations at areas A and B were conducted on July 12 and 13, 2005. These excavation operations were conducted at the dimensions outlined above, which were extended as needed to remove any other soils with staining, odors, and/or organic vapors. Verification base and sidewall samples were then obtained for analytical testing, which did not indicate soil impacts greater than the Type 1 RRS. Therefore, excavations ceased in these areas. Approximately 100 tons of impacted soils were removed from these areas for off-site disposal.

Excavation operations at area C were conducted on July 14, 2005. These excavation operations were conducted at the dimensions outlined above, which were extended as needed to remove any other soils with staining, odors, and/or organic vapors. Verification base and sidewall samples were then obtained for analytical testing, which did not indicate soil impacts greater than the Type 1 RRS. Therefore, excavations ceased in this area. Approximately 30 tons of impacted soils were removed from these areas for off-site disposal.

The areas of excavation are illustrated on Figures 7 and 14. Verification sample locations are also illustrated on Figure 14. Photographs of the excavations are included in Appendix F.

Metals-Excavation Pit E

Concentrations of lead and mercury in excess of the Type 1 or 2 RRS were identified at the Project Site in the pre-excavation assessments. Based on the analytical testing data, soil impacts by lead at concentrations greater than the Type 2 RRS were limited to one area: near sample D-1. The extent of the lead impact was estimated as an approximate 10 by 10 by 2 feet thick area, at a depth of about 9 to 11 feet below the existing grades. No mercury impacts were present at concentrations greater than the Type 2 RRS.

Initial excavation operations at area E were conducted on August 10, 2005. The initial excavation operations were conducted at the dimensions outlined above. Due to the presence of an existing soil slope in the area (vertical in some areas), which was the result of building demolition, the extent of impact was limited to the east and south, where the elevation of dark colored soils did not exist (this is where building previously existed). In the excavation, two layers of dark colored soils were present, one from approximately 6 to 8 and the other from approximately 9 to 11 feet below the existing grades. Both layers appeared to consist of the same materials. Verification base and sidewall samples were obtained for analytical testing of RCRA

metals, as discussed below, which did not indicate soil impacts of lead above its Type 2 RRS. However, arsenic was detected in two sidewall samples above its Type 1 RRS, which required removal actions.

Additional excavation was conducted on August 12, 2005. The area was excavated an additional approximate 3 feet west and north. The excavation extended from ground surface to about 12 feet below the existing grade. Two sidewall samples were then obtained for analytical testing of arsenic. [Two additional sidewall samples were also obtained about 1 foot west and north from these samples, which were placed on hold at the analytical testing laboratory pending initial analysis.] Analytical testing of the initial samples indicated arsenic impacts greater than the Type 1 RRS at one location, the western-most sample. Therefore, the sample obtained about 1 foot west was submitted for analytical testing of arsenic. Testing of this sample indicated an arsenic concentration greater than the Type 1 RRS.

Additional excavations were then conducted August 15, 2005, which included excavating an additional approximate 3 feet to the west of this area, with the same depths and lateral distance as described above. An additional sidewall sample was then obtained. Analytical testing of that sample did not indicate an arsenic concentration above the laboratory detection limit. Therefore, excavations in this area were complete. Approximately 90 tons of impacted soils were removed from this area for off-site disposal.

The area of excavation is illustrated on Figures 7 and 15. Verification sample locations are also illustrated on Figure 15. Photographs of the excavations are included in Appendix F.

Soil Disposal

Soil transportation and disposal operations were managed by Greenleaf. TCLP analytical testing of the soils from the area with the greatest concentration of PCE (sample C-2A at 15 feet, 4.0 mg/kg) did not leach PCE at concentrations greater than 0.100 milligrams per liter (mg/L) (and verbally reported by the laboratory to be less than 1.0 micrograms per liter (ug/L)). This result is below the regulatory leaching concentration of 0.700 mg/L for PCE impacted soils. Therefore, since the actual source of the release is unknown, these soils were disposed of as non-hazardous wastes. Further, at the request of Greenleaf, additional analytical testing data and other information was provided for the determination of proper soil disposal. Based on the analytical testing data and information provided, all soils with impacts greater than the higher of the applicable Type 1 or 2 RRS were disposed as non-hazardous wastes at Eagle Point Landfill located in Ballground, Georgia. A letter report describing the analytical testing conducted for the determination of soil disposal is included in Appendix G. A summary of the disposal manifests for soil disposal are included in Appendix H. Complete copies of the disposal manifests are on file at United Consulting.

Additional analytical testing was conducted on the soils with lead impacts in the area of D-1, which had a total lead concentration of 296 mg/kg. Initial TCLP results from the dark colored materials at D-1 did not show leaching concentrations above the laboratory detection limit of 0.05 mg/L. The second sample obtained from this area was tested for total lead. Analytical testing of that sample showed lead with a total concentration of 47.3 mg/kg. Based on this data,

the lead impacted soils with impacts greater than the Type 2 RRS were also disposed as non-hazardous wastes at Eagle Point Landfill located in Ballground, Georgia.

Excavation Inspection – Verification Sampling

General

Soils were removed from the areas with CI impacts greater than the Type 1 RRS or Type 2 RRS, as appropriate. Data collected at the Project Site was used to determine the excavation extents. Confirmation soil samples were collected from the base and sidewalls of the excavations for verification of the removal of concentrations above the higher of the applicable Type 1 or 2 RRS, as outlined in the VCAP. Excavations were extended as necessary to remove soil concentrations in excess of Type 1 RRS or Type 2 RRS, or to the groundwater table, whichever occurred first.

As set forth in the VCAP, soil confirmation sampling was conducted at a rate of one sample for every 400 square feet of exposed base. Sidewall samples were collected at a rate of one sample for every 25 linear feet of sidewall. Every excavation had at least one base sample and four sidewall samples. In the case where groundwater covered the bottom of the excavation, no base samples were collected. Rather, additional sidewall samples were collected from approximately 2 feet above the groundwater level at the 25 foot interval described above.

PCE and Free Product-Excavation Pit D

Confirmation analytical testing included VOCs in the area of PCE and free product excavation. Sidewall samples were collected at a rate of one sample for every 25 linear feet of sidewall. In the upper 10 feet of this excavation, 11 sidewall samples (SW-1 through SW-11) were collected for analytical testing. These samples were obtained from depths ranging from 6 to 10 feet below grades. These depths were selected based on staining, odors, and/or organic vapor screening results throughout the vertical sidewall section. Analytical testing of these samples did not indicate the presence of VOCs, including PCE, at concentrations greater than the applicable Type 1 RRS. Therefore, additional lateral excavation outside the 45 by 100 foot area was not conducted.

Once the excavation reached the planned total depth, groundwater was present in the entire excavation so base samples were not obtained for analytical testing. Therefore, twelve sidewall samples were obtained from depths of about 2 feet above the groundwater table (SW-12 through SW-23). These samples were obtained from depths ranging from 16 to 19 feet below grades. Analytical testing of these samples indicated the presence of PCE and TCE at concentrations greater than the Type 1 RRS in two samples (SW-15 and SW-16). Therefore, additional lateral excavation and subsequent sidewall sampling (SW-15A, SW-15/16A, and SW-16A) was conducted in this area. One of the three additional sidewall samples (SW-16A) had PCE above the Type 1 RRS. Therefore, additional lateral excavation and subsequent sidewall sampling (SW-16B) was conducted in this area. No additional impacts greater than the Type 1 RRS were detected, and additional excavation was not required.

Strong odors and organic vapors (up to about 50 ppm) were observed/detected at the northwestern corner (at SW-1 and SW-11) of the 45 by 100 foot area and in the area of the

additional excavation (at SW-15 and SW-16). The analytical testing of the samples obtained for VOC analysis from SW-1 and SW-11 showed low concentrations of some compounds, but below the RRS. Higher concentration of some constituents were detected at SW-15, SW-16, SW-15A, SW-15/16A, and SW-16A.

Based on conversations with the analytical testing laboratory, these samples showed matrix interference, indicating that compounds other than VOCs may be present in those samples. The laboratory further indicated that the interference may have been from mineral spirits/naphtha, which may contain compounds that could be detected with SVOC analysis.

Samples SW-1 and SW-11 were tested for SVOCs, which showed the presence of two compounds in one sample; 2-methylnaphthalene and naphthalene. 2-methylnaphthalene is not a HSRA regulated compound. The concentration of these compounds were low and the concentration of naphthalene was below the NC and Type 1 RRS. After the SVOC analysis, laboratory personnel indicated that the impacts in the samples were "undoubtedly" mineral spirits. Compounds other than the common SVOC listed compounds are included in mineral spirits, with the primary constituent being trimethylbenzene. This compound is not a HSRP regulated constituent.

In order to further assess the potential presence of other regulated SVOCs in this excavation, four additional soil samples were submitted for SVOC analysis, SW-20, SW-21, SW-22, and SW-23. Analytical testing of these samples did not indicate the presence of SVOCs.

Elevated detection limits were present in the VOC analysis at samples SW-12 through SW-18, SW-15A, SW-15/16A, and SW-16A. The laboratory indicated this was again due to matrix interference from the mineral spirits. In some cases, the detection limits were greater than the laboratory reporting limits. Therefore, the J flagged data, data below the laboratory reporting limit but above the quantitation limit, was reviewed for the potential need of additional excavation. The laboratory then reviewed internal information and was able to reduce the laboratory reporting limits for compounds of concern (mainly benzene, PCE, and trichloroethene). This resulted in additional excavation at SW-15, SW-16, and SW-16A, as described above. J flagged data did not indicate the presence of other constituents near their respective RRS.

Free product was excavated from the soil pore space as described above. Analytical testing of the free product and soils near the groundwater table indicated that these materials may be indicative of old petroleum or mineral spirits. The compounds detected in the free product included certain CIs. The excavation extended to a depth of about 3.11 feet below the top of free product, to an elevation of about 965.5 feet msl. Groundwater was not present in the base of the excavation immediately following the excavation operations. Therefore, two test pits were excavated to a depth of about 8 feet below the excavation base, or to an elevation of about 957.5 feet msl. Groundwater conditions were then monitored for an approximate 3 day period. On the first day, groundwater was within about 4.5 feet of the top of the test pits, or at an approximate elevation of 961 feet. Some minor amounts of pooled groundwater was present in isolated areas of the excavation base. On the second day, groundwater was within about 1.5 feet of the top of the test

pits, or at an approximate elevation of 964 feet. Pooling was increasing on the base of the excavation. On that day, two drive cone samples were obtained in clear plastic tubing for assessment from the base of the excavation. These samples were pushed about 2 feet into the base of the excavation, then extracted for visual observation. These observations did not reveal free product in the soil pore spaces. On the third day, groundwater covered the majority of the excavation base, with significant pooling. No floating free product was observed on the groundwater during this monitoring/sampling process and no free product was observed entering the sides of the excavations. Therefore, additional excavation was not conducted.

The areas of excavation are illustrated on Figures 6 and 12. Verification sample locations are also illustrated on Figure 12. Verification analytical testing results are summarized on Table 7. Verification sample laboratory analytical testing results are included in Appendix I.

Other Chemicals-Excavation Pits A through C

Confirmation analytical testing included PAHs in the three areas of Other Chemical excavations. The total length of the sidewall sections were less than 100 feet at each pit. However, as outlined it the VCAP, four sidewall samples were collected from each location, one from each side of the excavations. These samples were obtained from depths ranging from 5 to 7 feet below grades. These depths were selected based on staining, odors, and/or organic vapor screening results throughout the vertical sidewall section. Analytical testing of these samples did not indicate the presence of PAHs at concentrations greater than the Type 1 RRS. Therefore, additional lateral excavation outside these areas was not conducted or necessary.

One base sample was collected from the bottom of each excavation. The depths of the base samples were selected based on staining, odors, and/or organic vapor screening results. Analytical testing of these samples did not indicate the presence of PAHs at concentrations greater than the Type 1 RRS. Therefore, additional vertical excavations in these areas was not conducted.

The areas of excavation are illustrated on Figures 7 and 14. Verification sample locations are also illustrated on Figure 14. Verification analytical testing results are summarized on Table 7. Verification sample laboratory analytical testing results are included in Appendix I.

Metals - Excavation Pit E

Confirmation analytical testing included RCRA metals in the area of lead excavation. Due to the presence of an existing soil slope in the area (vertical in some areas), which was the result of building demolition, the extent of impact was limited to the east and south, where the elevation of dark colored soils did not exist (this is where building previously existed), only two sidewall verification samples were obtained; from the north and west walls. In the excavation, two layers of dark colored soils were present, one from approximately 6 to 8 and the other from approximately 9 to 11 feet below the existing grades. Both layers appeared to consist of the same materials. The two sidewall samples were obtained from the bottom layer, at about 10 feet below the existing grade, which was the same depth as the initial elevated lead detection at D-1. A base sample was also obtained from orange colored soils below the dark soils, at about 12 feet below the existing grades.

Initial excavation operations at pit E were conducted on August 10, 2005 for the removal of lead impacts greater than the Type 2 RRS, followed by additional removal operations on August 12 and 15, 2005 for the removal of arsenic impacts greater than the Type 1 RRS. Three rounds of sidewall excavation and additional sidewall sampling was required to demonstrate the removal of impacts to below the applicable RRS. Initial base sampling did not show impacts greater than the applicable Type 1 and/or Type 2 RRS. Approximately 90 tons of impacted soils were removed from this area for off-site disposal.

The areas of excavation are illustrated on Figures 7 and 15. Verification sample locations are also illustrated on Figure 15. Verification analytical testing results are summarized on Table 7. Verification sample laboratory analytical testing results are included in Appendix I.

Excavation Monitoring

During the excavation process, air monitoring was conducted primarily using a MultiRae Plus portable volatile gas meter. New passive dosimeter tubes for PCE and new pump dosimeter tubes for benzene were also placed on the down-wind sides of the excavation areas daily. The PCE tubes were from MSA and the benzene tubes from Dragger. All monitoring work was performed in compliance with the HASP and the VCAP, the HASP is included in Appendix E. An environmental specialist, trained in accordance with the OSHA standards for work on Hazardous sites[2], was on-site to document the excavation process, conduct air monitoring, and collect verification samples.

During the air monitoring operations, elevated gas concentrations were not detected. The average OVM reading during the excavation operations was about 5.4 ppm. PCE gases were not detected using the passive dosimeter tubes. The highest benzene concentration detected was 15 ppm, with the average concentration being below 10 ppm. The concentrations remained below action levels for worker safety throughout the excavation process. The air monitoring data obtained during the remedial excavation activities have been retained in the United Consulting project file.

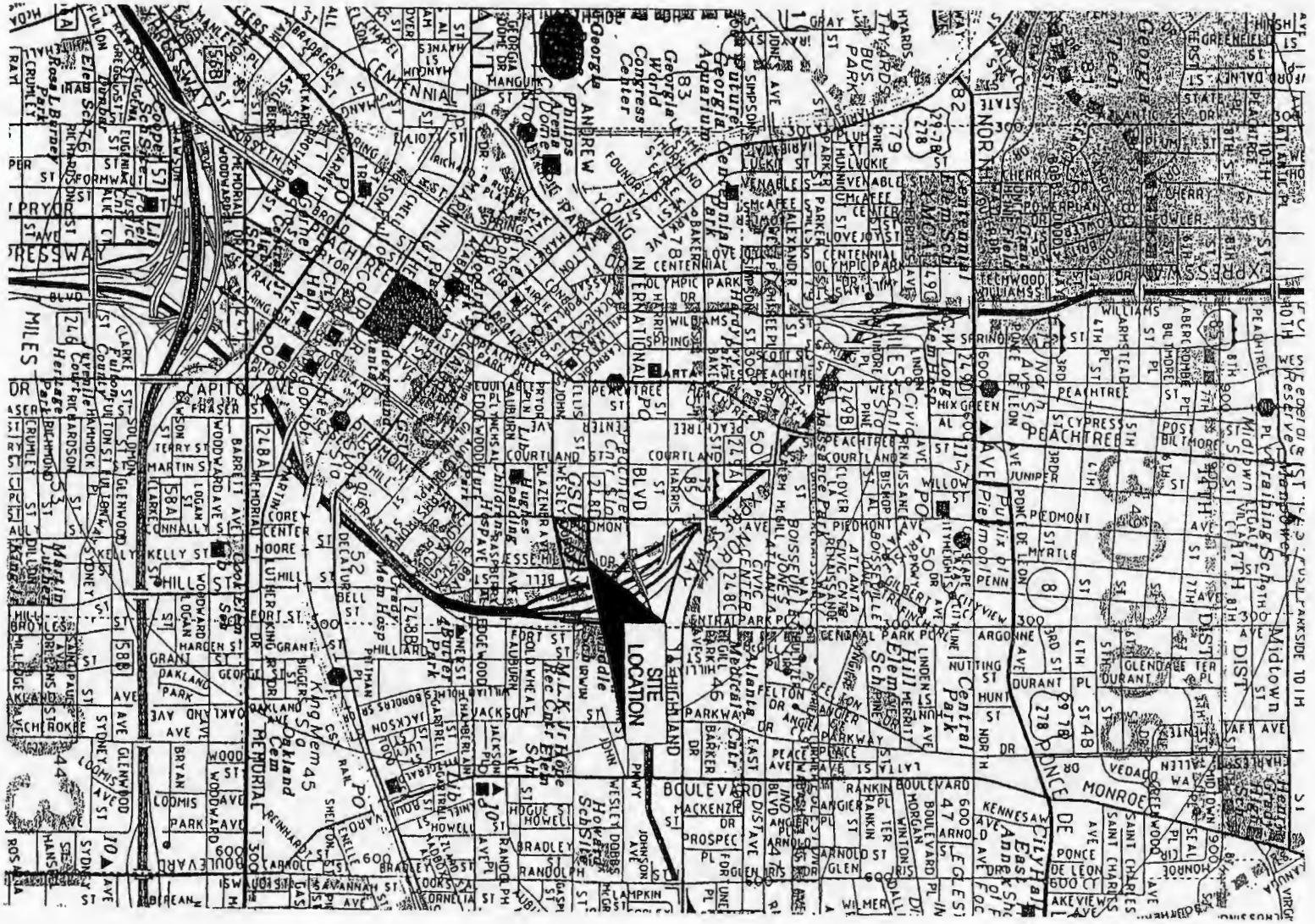
Venting System

Although soil removal operations have been conducted in the area of PCE and free product detections so as to render this area compliant with HSRA Type 1 or 2 RRS, due to prior detections of benzene, toluene, and xylenes in air samples obtained from this area, prior PCE detections in the area, and odors remaining in some soils, a venting system has been designed for this area. System details are not being included as part of this VCSR because it is not necessary to comply with HSRA RRS nor is it necessary to obtain protection under the Brownfields Act. However, general plans are for the installation of a gravel bed below the concrete slab with perforated pipe, which will vent at an exterior location on the north side of the building. The gravel/sand layer will likely be a minimum 8-inches thick with a minimum 4-inch

---

[2] OSHA Standard as promulgated in Title 29 of the Code of Federal Regulations, part 1910.120 (29 CFR 1910.120), Hazardous Waste Operations and Emergency Response

diameter perforated pipe for collecting the gasses. This pipe would connect to solid pipe, which would manifold several collection pipes to discharge beyond the exterior edge of the building.

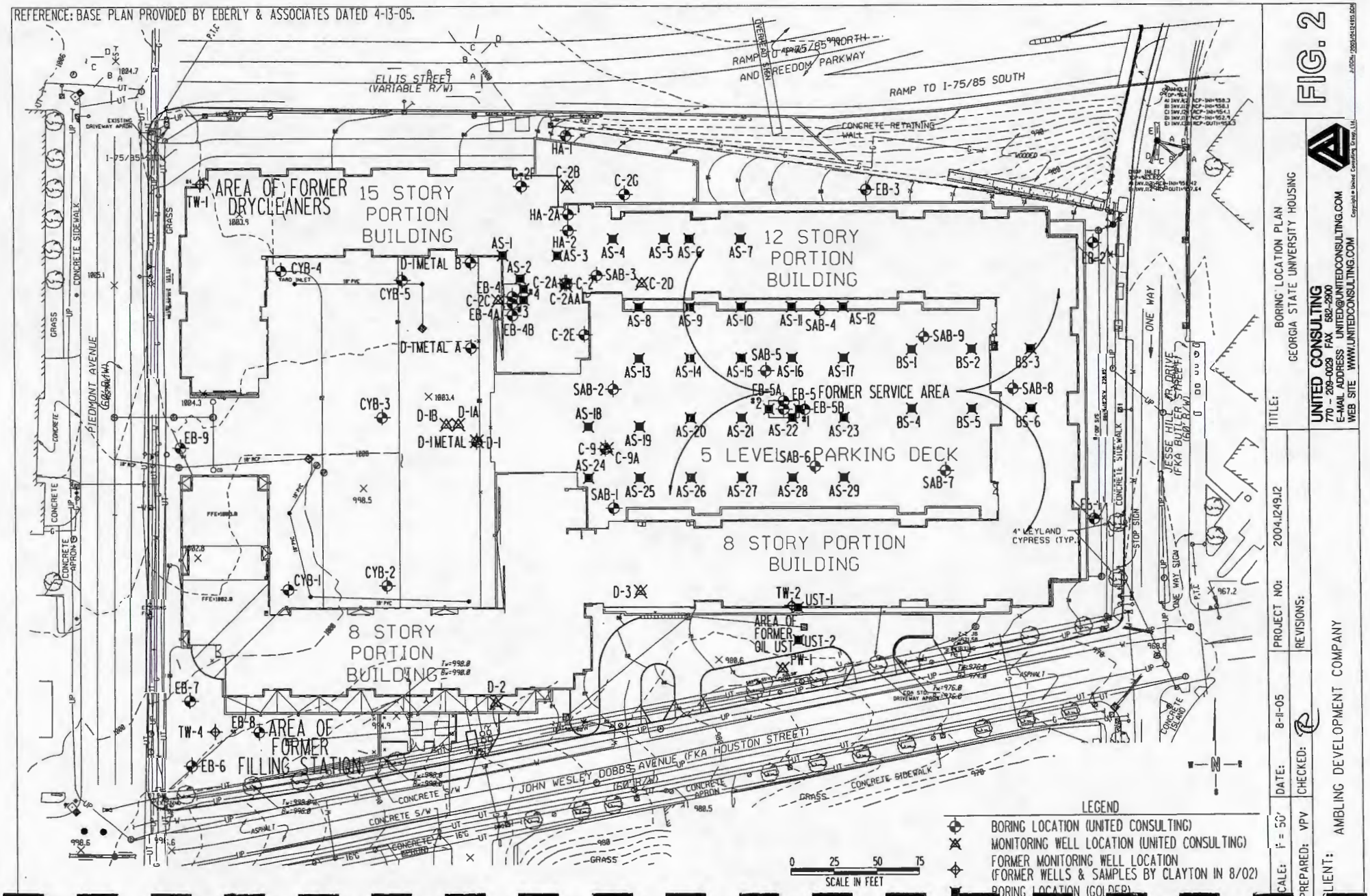


SCALE: 1" = 2,000'	DATE: 8-11-05	PROJECT NO: 2004.1249.12	TITLE: SITE LOCATION MAP GEORGIA STATE UNIVERSITY HOUSING
PREPARED: RG	CHECKED:	REVISIONS:	
CLIENT: AMBLING DEVELOPMENT COMPANY			

UNITED CONSULTING
770 - 209-0029 FAX 582-2900
E-MAIL ADDRESS UNITED@UNITEDCONSULTING.COM
WEB SITE WWW.UNITEDCONSULTING.COM

FIG. 1

J:/DGN/2004/04124915.DG


REFERENCE: BASE PLAN PROVIDED BY EBERLY & ASSOCIATES DATED 4-13-05.
AREA OF FORMER DRYCLEANERS
15 STORY PORTION BUILDING
12 STORY PORTION BUILDING
5 LEVEL PARKING DECK
8 STORY PORTION BUILDING
8 STORY PORTION BUILDING
AREA OF FORMER FILLING STATION
AREA OF FORMER OIL UST
FORMER SERVICE AREA
ELLIS STREET (VARIABLE R/W)
RAMP TO I-75/85 NORTH AND FREEDOM PARKWAY
RAMP TO I-75/85 SOUTH
CONCRETE RETAINING WALL
I-75/85
PIEDMONT AVENUE (60' R/W)
JESSE HILL JR. DRIVE (FKA BUTLER STREET) (60' R/W)
ONE WAY
JOHN WESLEY DOBBS AVENUE (FKA HOUSTON STREET) (60' R/W)
CONCRETE SIDEWALK
CONCRETE S/W
ASPHALT
GRASS
CONCRETE APRON
CONCRETE ISLAND
STOP SIGN
ONE WAY SIGN
4' LEYLAND CYPRESS (TYP.)
EXISTING DRIVEWAY APRON
DROP INLET
LEGEND
BORING LOCATION (UNITED CONSULTING)
MONITORING WELL LOCATION (UNITED CONSULTING)
FORMER MONITORING WELL LOCATION (FORMER WELLS & SAMPLES BY CLAYTON IN 8/02)
BORING LOCATION (GOLDER)
0 25 50 75
SCALE IN FEET
N
FIG. 2
BORING LOCATION PLAN
GEORGIA STATE UNIVERSITY HOUSING
UNITED CONSULTING
770 - 209-0029 FAX 582-2900
E-MAIL ADDRESS UNITED@UNITEDCONSULTING.COM
WEB SITE WWW.UNITEDCONSULTING.COM
Copyright © United Consulting Group, Ltd.
TITLE:
PROJECT NO: 2004.1249.12
REVISIONS:
DATE: 8-11-05
CHECKED:
PREPARED: VPV
SCALE: 1" = 50'
CLIENT: AMBLING DEVELOPMENT COMPANY

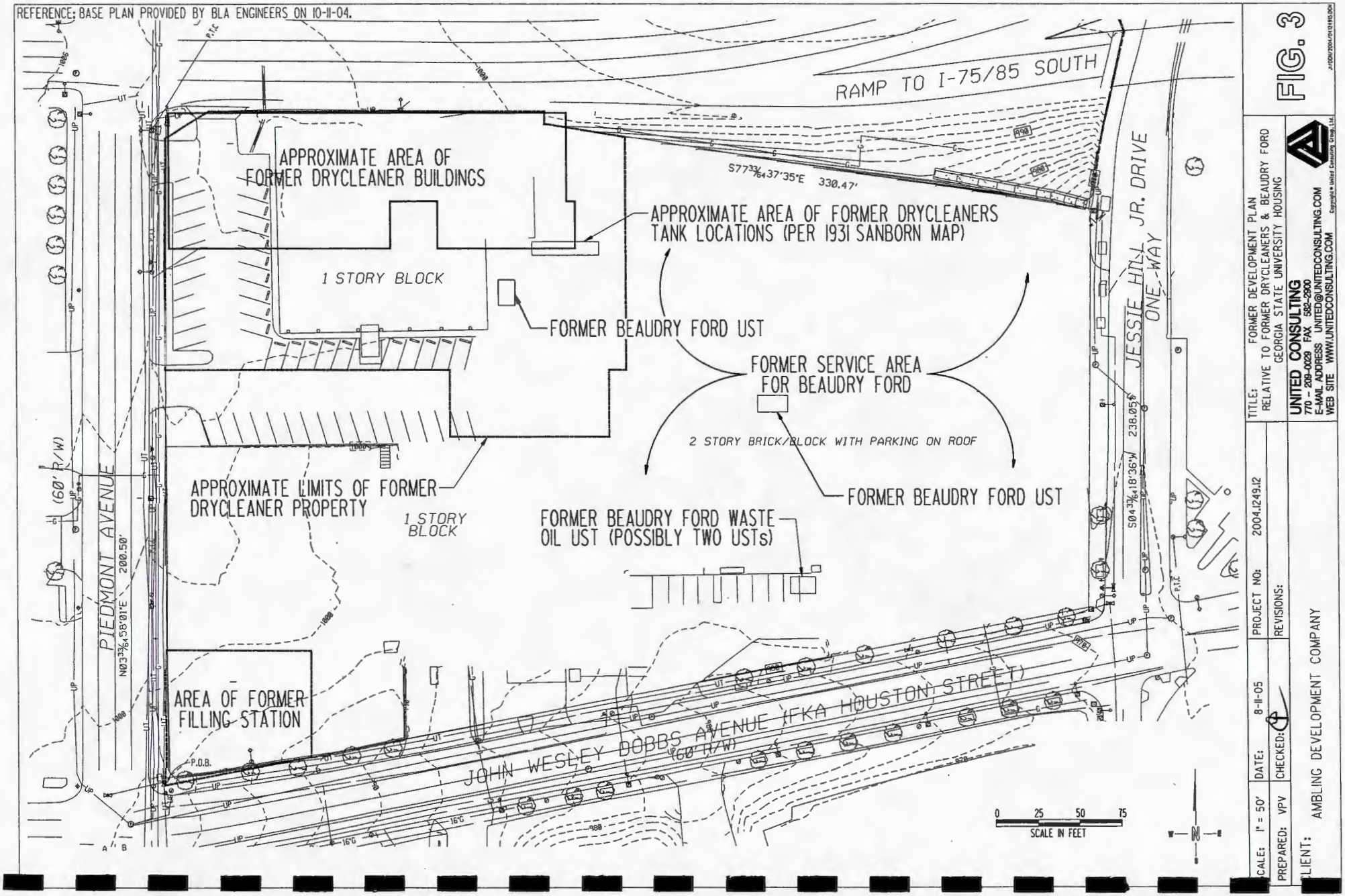


FIG. 3

TITLE: FORMER DEVELOPMENT PLAN RELATIVE TO FORMER DRYCLEANERS & BEAUDRY FORD GEORGIA STATE UNIVERSITY HOUSING

UNITED CONSULTING
770 - 209-0029 FAX 582-2900
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WEB SITE WWW.UNITEDCONSULTING.COM

CLIENT: AMBLING DEVELOPMENT COMPANY

PROJECT NO: 2004.1249.12

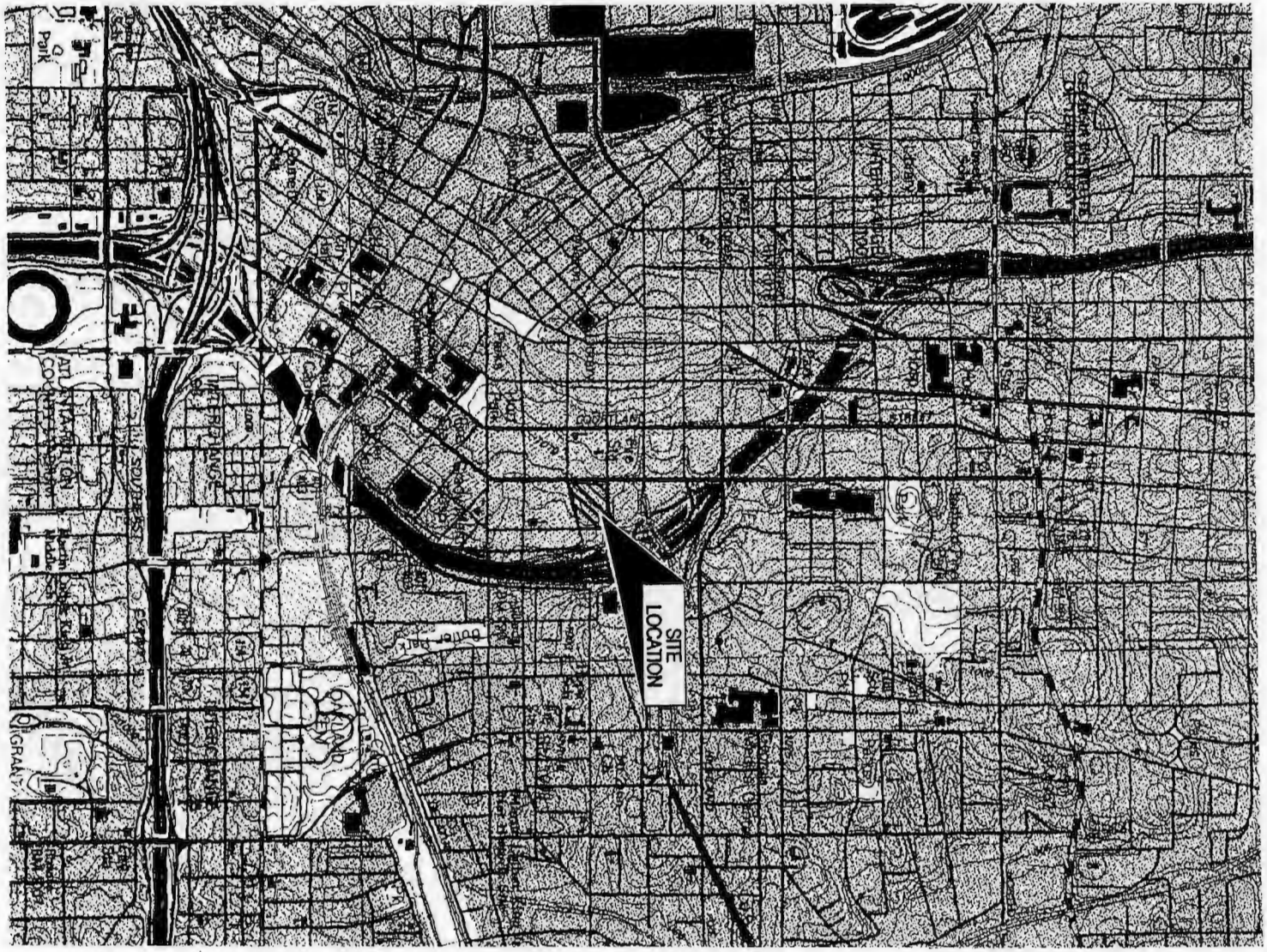
REVISIONS:

DATE: 8-11-05

CHECKED:

PREPARED: VPV

SCALE: 1" = 50'



SCALE: 1" = 2,000'	DATE: 8-11-05	PROJECT NO: 2004.1249.12	TITLE: USGS TOPOGRAPHIC SITE LOCATION MAP GEORGIA STATE UNIVERSITY HOUSING
PREPARED: RG	CHECKED:	REVISIONS:	
CLIENT: AMBLING DEVELOPMENT COMPANY			

UNITED CONSULTING
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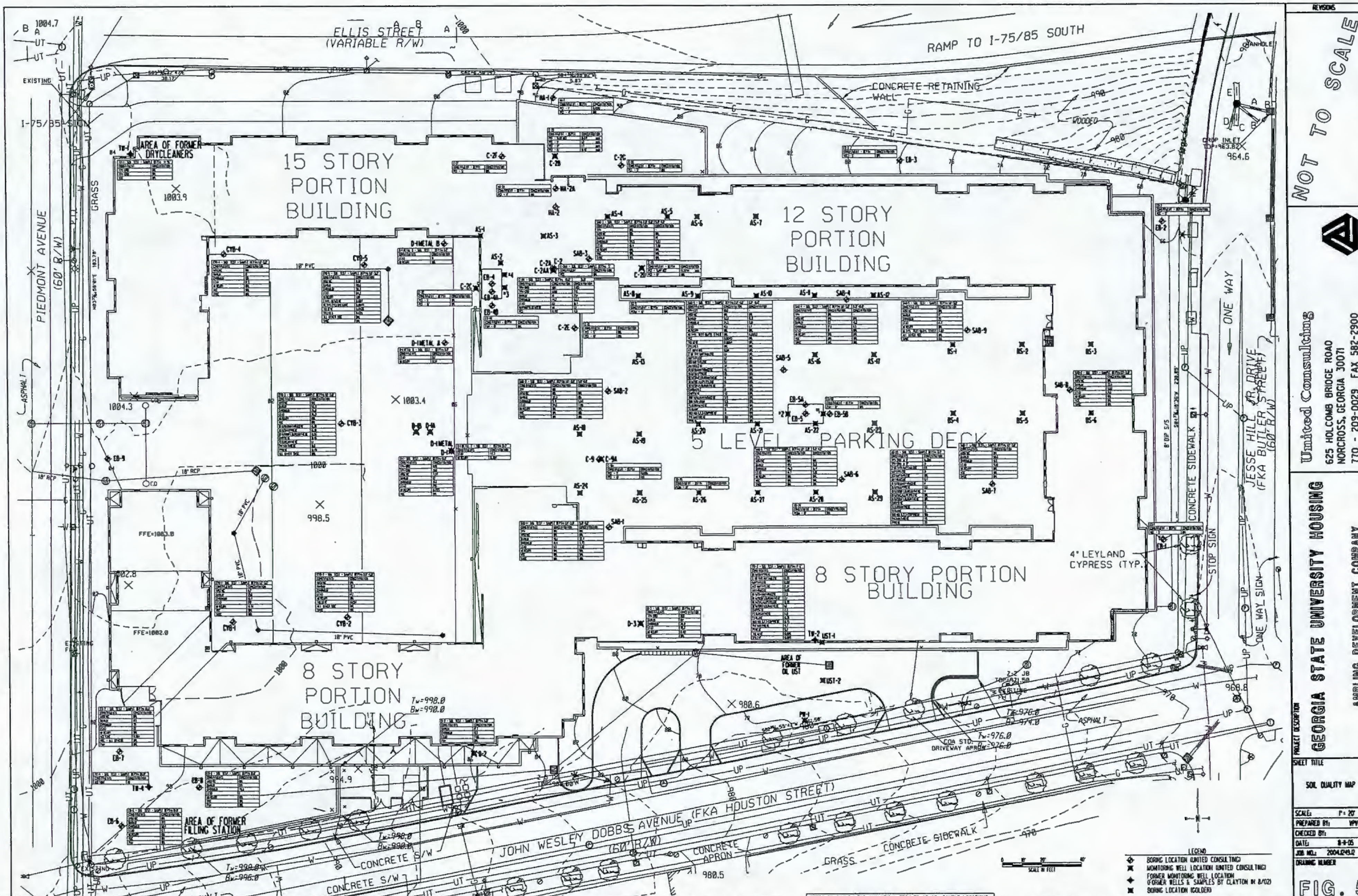
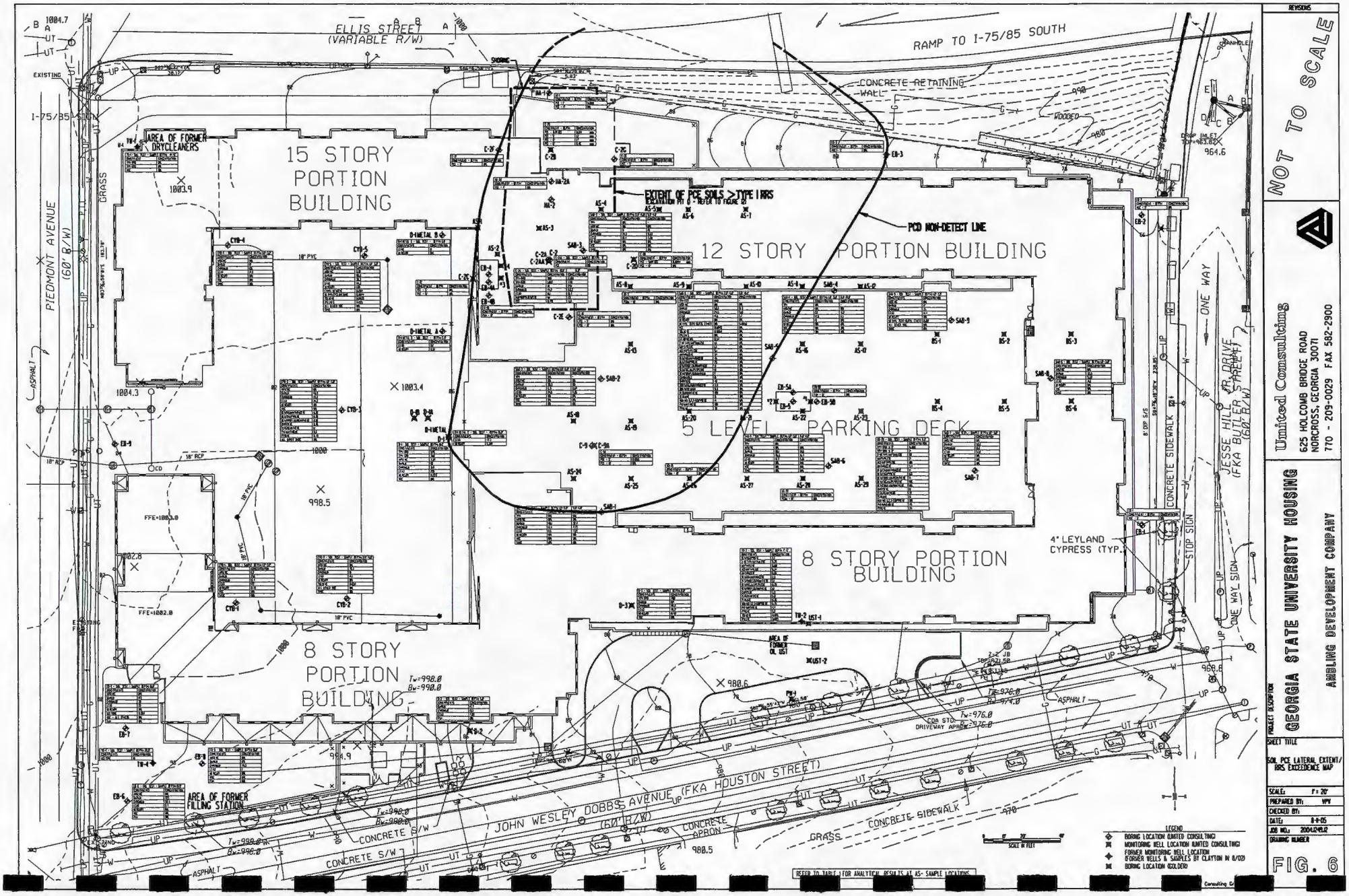
FIG. 4

J:/DGN/2004/04124915.D


ELLIS STREET (VARIABLE R/W)
RAMP TO I-75/85 SOUTH
CONCRETE RETAINING WALL
WOODED
I-75/85 SIGN
AREA OF FORMER DRYCLEANERS
15 STORY PORTION BUILDING
12 STORY PORTION BUILDING
5 LEVEL PARKING DECK
8 STORY PORTION BUILDING
8 STORY PORTION BUILDING
AREA OF FORMER OIL UST
AREA OF FORMER FILLING STATION
PIEDMONT AVENUE (60' R/W)
JOHN WESLEY DOBBS AVENUE (FKA HOUSTON STREET) (60' R/W)
JESSE HILL JR. DRIVE (FKA BUTLER STREET) (60' R/W)
ONE WAY
CONCRETE SIDEWALK
STOP SIGN
ONE WAY SIGN
4" LEYLAND CYPRESS (TYP.)
CONCRETE S/W
CONCRETE APRON
CONCRETE SIDEWALK
GRASS
ASPHALT
DROP INLET TOP=963.82
964.6
FFE=1003.8
FFE=1002.0
NOT TO SCALE
LEGEND
BORING LOCATION (UNITED CONSULTING)
MONITORING WELL LOCATION (UNITED CONSULTING)
FORMER MONITORING WELL LOCATION (FORMER WELLS & SAMPLES BY CLAYTON IN 8/02)
BORING LOCATION (GOLDER)
REFER TO TABLE 1 FOR ANALYTICAL RESULTS AT AS- SAMPLE LOCATIONS.
United Consulting
625 HOLCOMB BRIDGE ROAD
NORCROSS, GEORGIA 30071
770 - 209-0029 FAX 582-2900
GEORGIA STATE UNIVERSITY HOUSING
AMBLING DEVELOPMENT COMPANY
SOIL QUALITY MAP
JOB NO.: 2004.0249.2
FIG. 5



REVISIONS

NOT TO SCALE

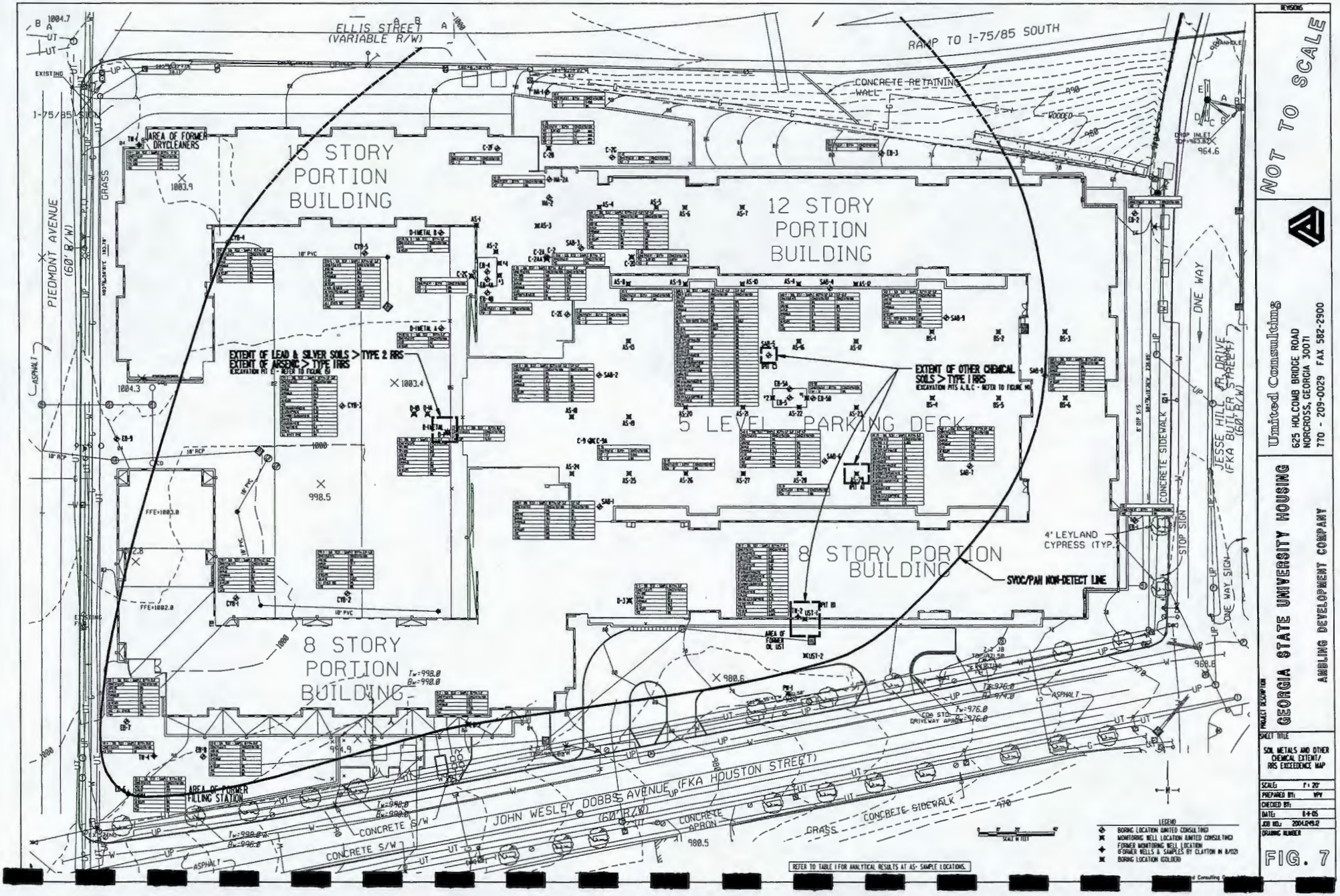
United Consulting
625 HOLCOMB BRIDGE ROAD
NORCROSS, GEORGIA 30071
770 - 209-0029 FAX 582-2900

PROJECT DESCRIPTION
GEORGIA STATE UNIVERSITY HOUSING
AMBLING DEVELOPMENT COMPANY

SHEET TITLE
SOIL PCE LATERAL EXTENT/ RBS EXCEEDENCE MAP

SCALE:	1" = 20'
PREPARED BY:	MPW
CHECKED BY:	
DATE:	8-1-05
JOB NO.:	2004249.02
DRAWING NUMBER	

FIG. 6



REVISIONS

NOT TO SCALE

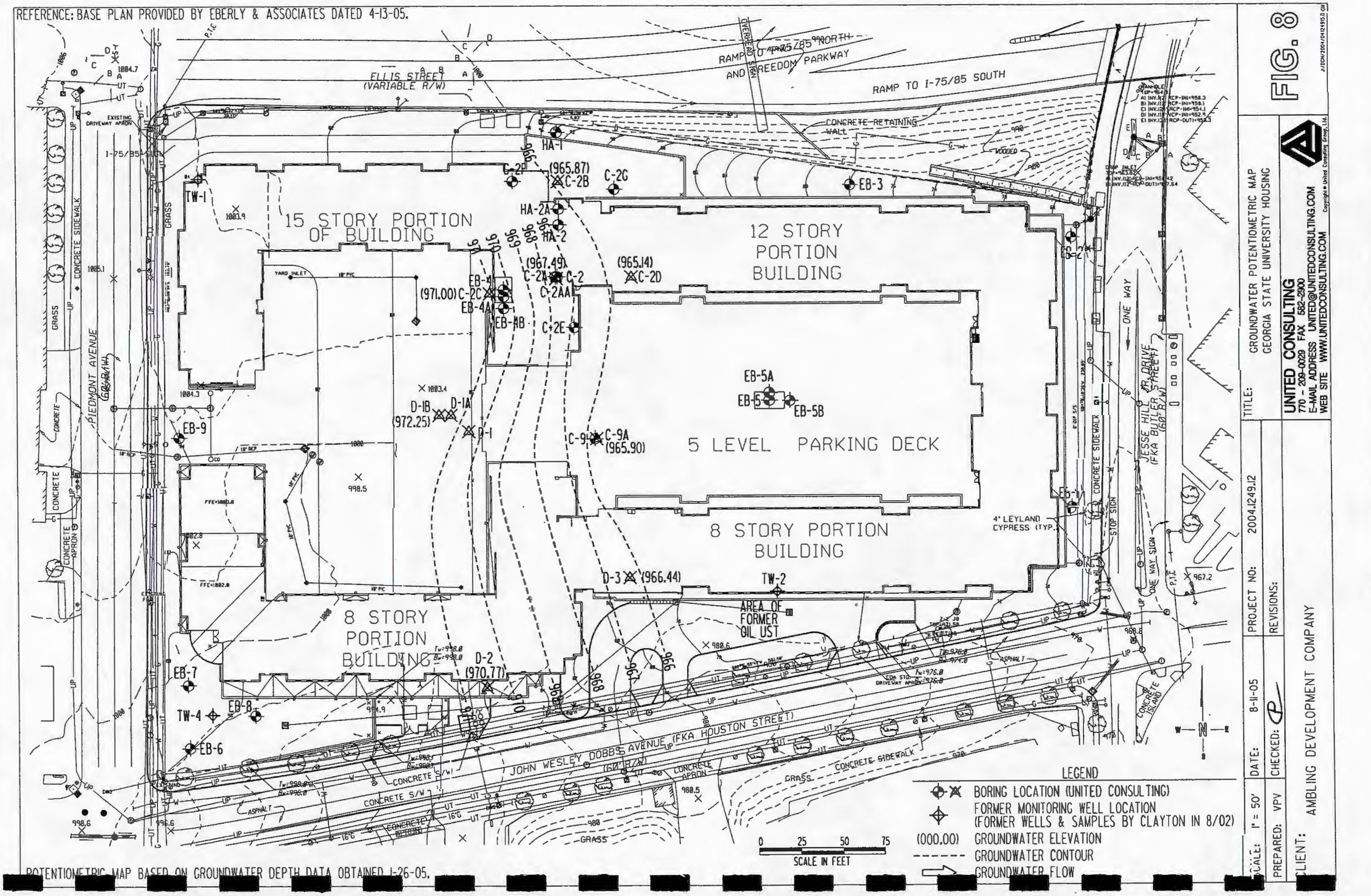
United Consulting
625 HOLCOMB BRIDGE ROAD
NORCROSS, GEORGIA 30071
770 - 209-0029 FAX 582-2900

PROJECT DESCRIPTION
GEORGIA STATE UNIVERSITY HOUSING
AMBLING DEVELOPMENT COMPANY

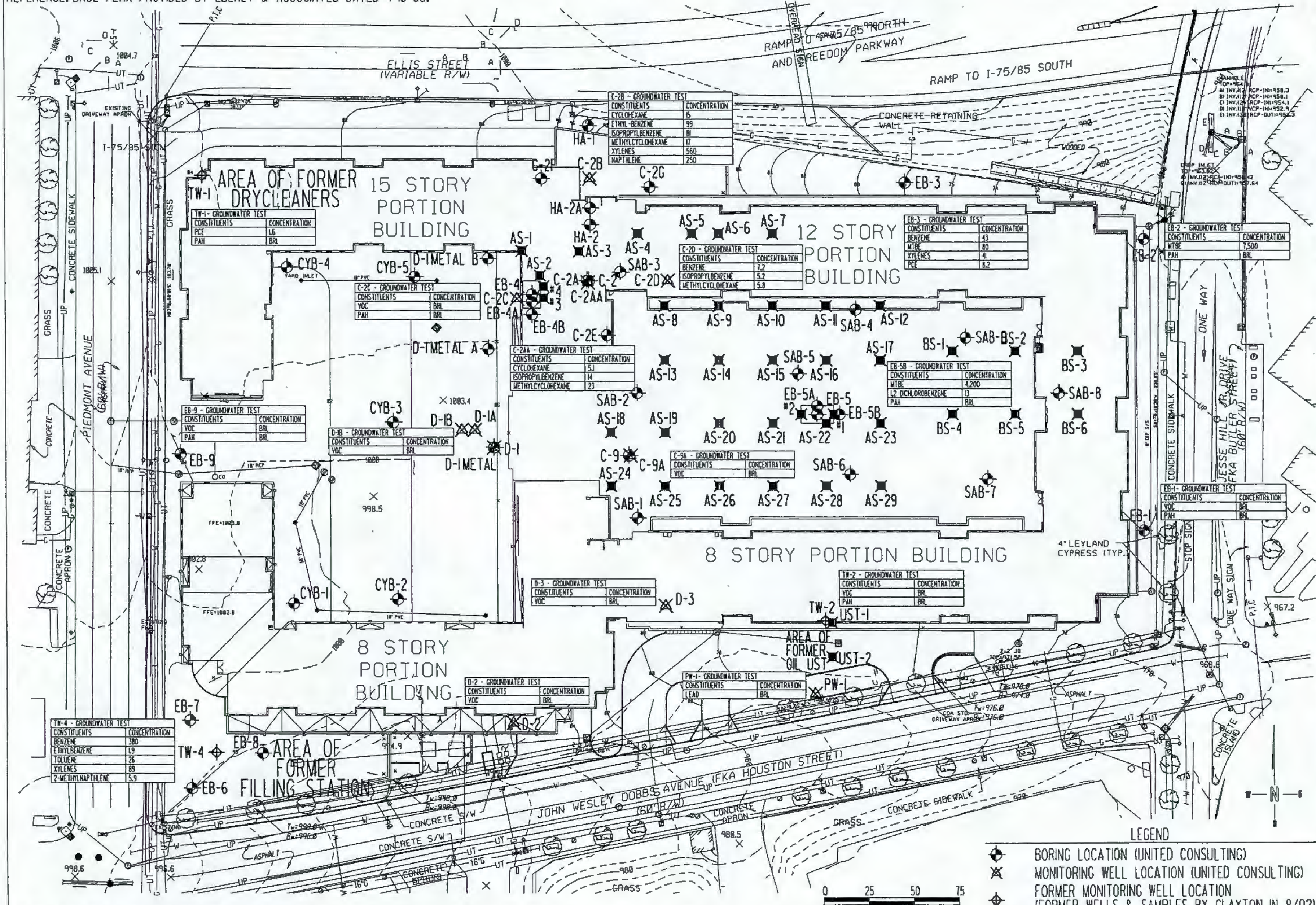
SHEET TITLE
SOIL METALS AND OTHER CHEMICAL EXTENT/ RRS EXCEEDENCE MAP

SCALE:	1" = 20'
PREPARED BY:	WW
CHECKED BY:	
DATE:	8-4-05
JOB NO.:	2004.049.2
DRAWING NUMBER	

FIG. 7


REFERENCE: BASE PLAN PROVIDED BY EBERLY & ASSOCIATES DATED 4-13-05.
ELLIS STREET
(VARIABLE R/W)
RAMP TO I-75/85 NORTH
AND FREEDOM PARKWAY
RAMP TO I-75/85 SOUTH
CONCRETE RETAINING WALL
WOODED
15 STORY PORTION OF BUILDING
12 STORY PORTION BUILDING
5 LEVEL PARKING DECK
8 STORY PORTION BUILDING
8 STORY PORTION BUILDING
AREA OF FORMER OIL UST
PIEDMONT AVENUE
CONCRETE SIDEWALK
GRASS
JOHN WESLEY DOBBS AVENUE (FKA HOUSTON STREET)
(60' R/W)
JESSE HILL JR. DRIVE
(FKA BUTLER STREET)
(60' R/W)
ONE WAY
STOP SIGN
4" LEYLAND CYPRESS (TYP.)
TW-1
TW-2
TW-4
HA-1
HA-2
HA-2A
C-2F
(965.87) C-2B
C-2G
(967.49) C-2A C-2
C-2AA
(965.14) C-2D
(971.00) C-2C
EB-4
EB-4A
EB-4B
C-2E
EB-3
EB-5A
EB-5
EB-5B
D-1B
D-1A
(972.25)
D-1
C-9 C-9A
(965.90)
D-3 (966.44)
D-2
(970.77)
EB-1
EB-6
EB-7
EB-8
EB-9
0 25 50 75
SCALE IN FEET
LEGEND
BORING LOCATION (UNITED CONSULTING)
FORMER MONITORING WELL LOCATION (FORMER WELLS & SAMPLES BY CLAYTON IN 8/02)
(000.00) GROUNDWATER ELEVATION
GROUNDWATER CONTOUR
GROUNDWATER FLOW
POTENTIOMETRIC MAP BASED ON GROUNDWATER DEPTH DATA OBTAINED 1-26-05.
TITLE: GROUNDWATER POTENTIOMETRIC MAP
GEORGIA STATE UNIVERSITY HOUSING
UNITED CONSULTING
770 - 209-0029 FAX 582-2900
E-MAIL ADDRESS UNITED@UNITEDCONSULTING.COM
WEB SITE WWW.UNITEDCONSULTING.COM
FIG. 8
PROJECT NO: 2004.1249.12
REVISIONS:
SCALE: 1" = 50'
DATE: 8-11-05
PREPARED: VPV
CHECKED:
CLIENT: AMBLING DEVELOPMENT COMPANY

REFERENCE: BASE PLAN PROVIDED BY EBERLY & ASSOCIATES DATED 4-13-05.



C-2B - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
CYCLOHEXANE	15
ETHYL-BENZENE	99
ISOPROPYLBENZENE	81
METHYLCYCLOHEXANE	17
XYLENES	560
NAPTHLENE	250

TW-1 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
PCE	1.6
PAH	BRL

C-2C - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL
PAH	BRL

C-2D - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
BENZENE	7.2
ISOPROPYLBENZENE	5.2
METHYLCYCLOHEXANE	5.8

EB-3 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
BENZENE	43
MTBE	80
XYLENES	41
PCE	8.2

EB-2 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
MTBE	7,500
PAH	BRL

C-2AA - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
CYCLOHEXANE	5.J
ISOPROPYLBENZENE	14
METHYLCYCLOHEXANE	23

EB-5B - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
MTBE	4,200
1,2 DICHLOROBENZENE	13
PAH	BRL

EB-9 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL
PAH	BRL

D-1B - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL

C-9A - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL

EB-1 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL
PAH	BRL

D-3 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL

TW-2 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL
PAH	BRL

PW-1 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
LEAD	BRL

D-2 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL

TW-4 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
BENZENE	380
ETHYLBENZENE	1.9
TOLUENE	26
XYLENES	89
2-METHYLNAPTHLENE	5.9

LEGEND

- BORING LOCATION (UNITED CONSULTING)
- MONITORING WELL LOCATION (UNITED CONSULTING)
- FORMER MONITORING WELL LOCATION (FORMER WELLS & SAMPLES BY CLAYTON IN 8/02)
- BORING LOCATION (GOLDER)

NOTE: ALL RESULTS IN MICROGRAMS PER LITER (ug/L).

FIG. 9

TITLE: GROUNDWATER QUALITY MAP
GEORGIA STATE UNIVERSITY HOUSING

UNITED CONSULTING
770 - 209-0029 FAX 582-2900
E-MAIL ADDRESS UNITED@UNITEDCONSULTING.COM
WEB SITE WWW.UNITEDCONSULTING.COM

PROJECT NO: 2004.1249.12

REVISIONS:

DATE: 8-11-05

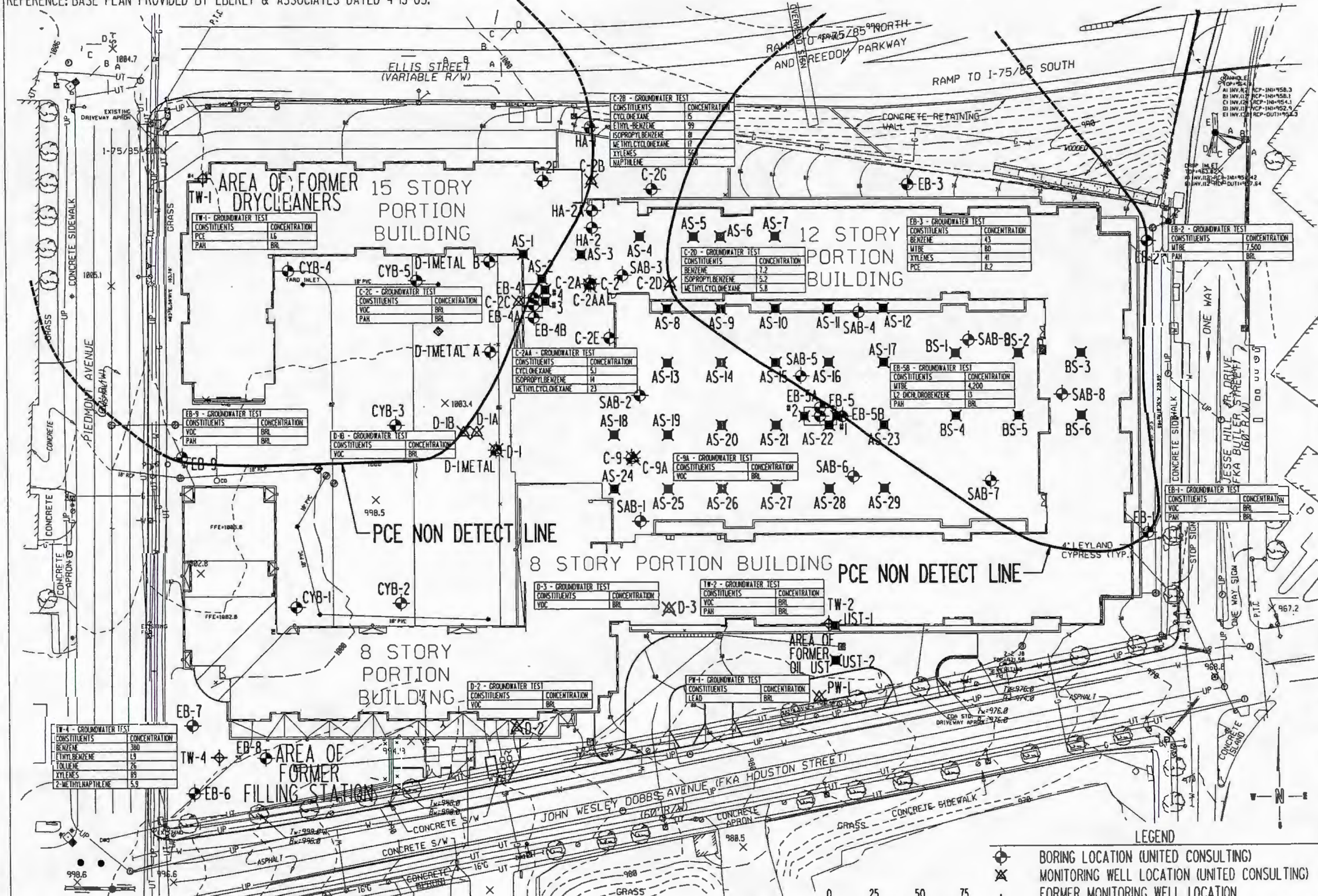
CHECKED:

SCALE: 1" = 50'

PREPARED: VPV

CLIENT: AMBLING DEVELOPMENT COMPANY

REFERENCE: BASE PLAN PROVIDED BY EBERLY & ASSOCIATES DATED 4-13-05.



C-2B - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
CYCLOHEXANE	15
ETHYL-BENZENE	99
ISOPROPYLBENZENE	81
METHYLCYCLOHEXANE	17
XYLENES	56[illegible]
NAPTHLENE	[illegible]50

TW-1 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
PCE	1.6
PAH	BRL

C-2C - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL
PAH	BRL

C-2D - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
BENZENE	7.2
ISOPROPYLBENZENE	5.2
METHYLCYCLOHEXANE	5.8

EB-3 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
BENZENE	43
MTBE	80
XYLENES	41
PCE	8.2

EB-2 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
MTBE	7,500
PAH	BRL

C-2AA - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
CYCLOHEXANE	5J
ISOPROPYLBENZENE	14
METHYLCYCLOHEXANE	23

EB-5B - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
MTBE	4,200
1,2 DICHLOROBENZENE	13
PAH	BRL

EB-9 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL
PAH	BRL

D-1B - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL

C-9A - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL

EB-1 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL
PAH	BRL

D-3 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL

TW-2 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL
PAH	BRL

PW-1 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
LEAD	BRL

D-2 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
VOC	BRL

TW-4 - GROUNDWATER TEST	
CONSTITUENTS	CONCENTRATION
BENZENE	380
ETHYLBENZENE	1.9
TOLUENE	26
XYLENES	89
2-METHYLNAPTHLENE	5.9

LEGEND

- BORING LOCATION (UNITED CONSULTING)
- MONITORING WELL LOCATION (UNITED CONSULTING)
- FORMER MONITORING WELL LOCATION (FORMER WELLS & SAMPLES BY CLAYTON IN 8/02)
- BORING LOCATION (GOLDER)

NOTE: ALL RESULTS IN MICROGRAMS PER LITER (ug/L).

FIG. 10

TITLE: PCE LATERAL EXTENT MAP
GEORGIA STATE UNIVERSITY HOUSING

UNITED CONSULTING
770 - 209-0029 FAX 582-2900
E-MAIL ADDRESS UNITED@UNITEDCONSULTING.COM
WEB SITE WWW.UNITEDCONSULTING.COM

PROJECT NO: 2004.1249.12
REVISIONS:
DATE: 8-11-05
CHECKED:
SCALE: 1" = 50'
PREPARED: VPV
CLIENT: AMBLING DEVELOPMENT COMPANY

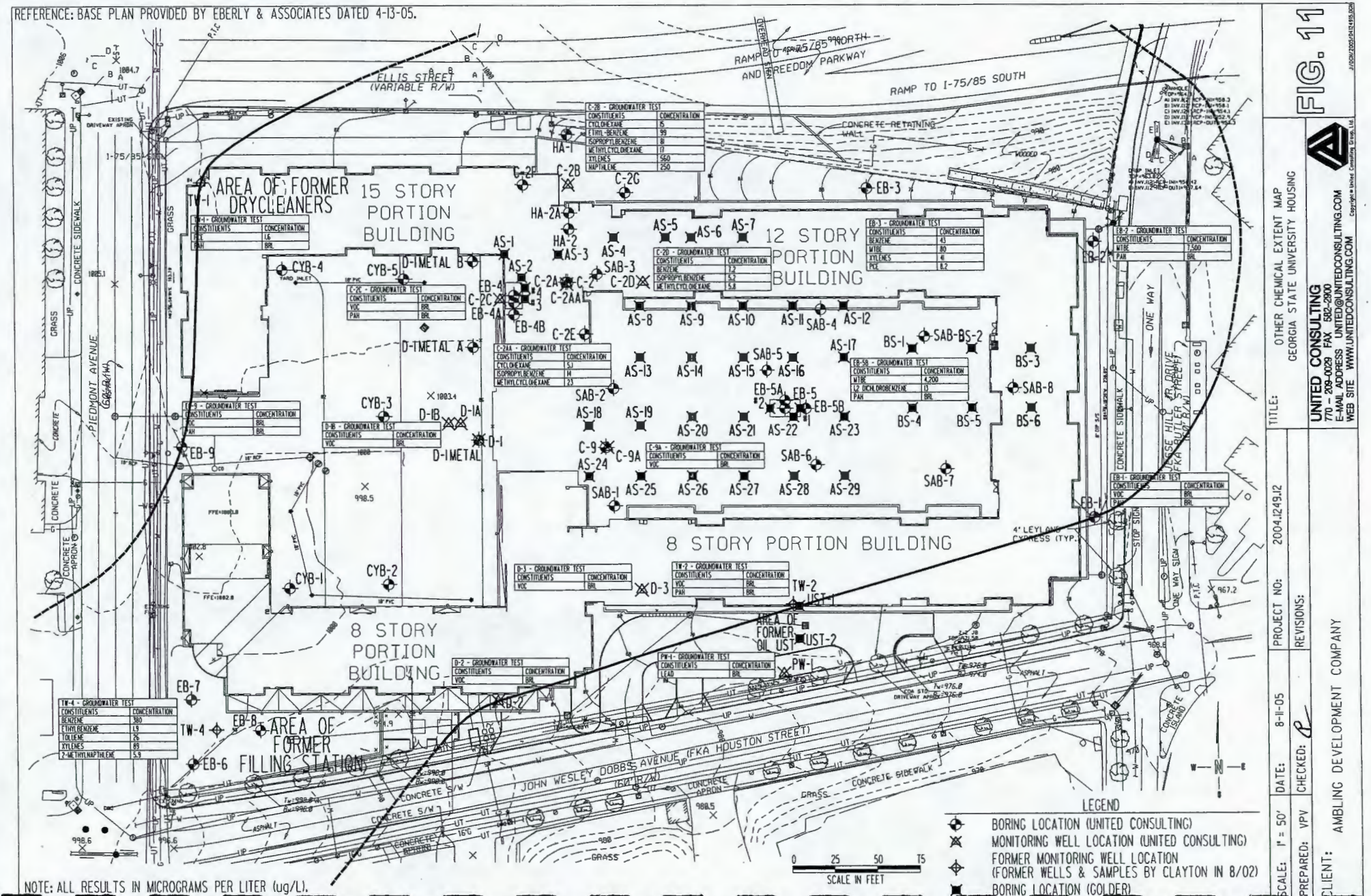


FIG. 11

TITLE: OTHER CHEMICAL EXTENT MAP
GEORGIA STATE UNIVERSITY HOUSING

UNITED CONSULTING
770 - 209-0029 FAX 582-2900
E-MAIL ADDRESS: UNITED@UNITEDCONSULTING.COM
WEB SITE WWW.UNITEDCONSULTING.COM

SCALE: 1" = 50' | DATE: 8-11-05 | PROJECT NO: 2004.1249.12
PREPARED: VPV | CHECKED: | REVISIONS:

CLIENT: AMBLING DEVELOPMENT COMPANY

EXCAVATION PIT D

NOTE: STAGE NUMBERS INDICATE ORDER OF EXCAVATION

LEGEND

⊠ SAMPLE LOCATION

TITLE: PCE EXCAVATION/SOIL VERIFICATION SAMPLE LOCATION PLAN GEORGIA STATE UNIVERSITY HOUSING

FIG. 12

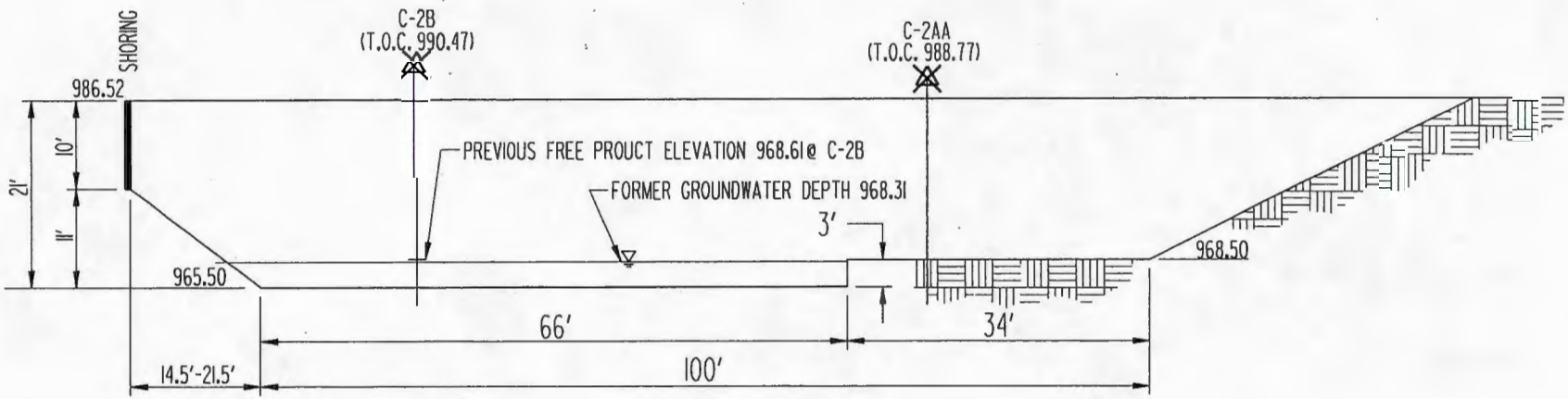
UNITED CONSULTING
770 - 209-0029 FAX 582-2900
E-MAIL ADDRESS UNITED@UNITEDCONSULTING.COM
WEB SITE WWW.UNITEDCONSULTING.COM

J:/DGN/2005/0412492.

SCALE: 1" = 20' | DATE: 8-11-05 | PROJECT NO: 2004.1249.12

PREPARED: VPV | CHECKED: | REVISIONS:

CLIENT: AMBLING DEVELOPMENT COMPANY



NORTH

SCALE: 1" = 20'	DATE: 8-11-05	PROJECT NO: 2004.1249.12	TITLE: CROSS SECTION OF PCE/FREE PRODUCT EXCAVATION GEORGIA STATE UNIVERSITY HOUSING
PREPARED: VPV	CHECKED:	REVISIONS:	
CLIENT: AMBLING DEVELOPMENT COMPANY			

UNITED CONSULTING
770 - 209-0029 FAX 582-2900
E-MAIL ADDRESS UNITED@UNITEDCONSULTING.COM
WEB SITE WWW.UNITEDCONSULTING.COM

FIG. 13

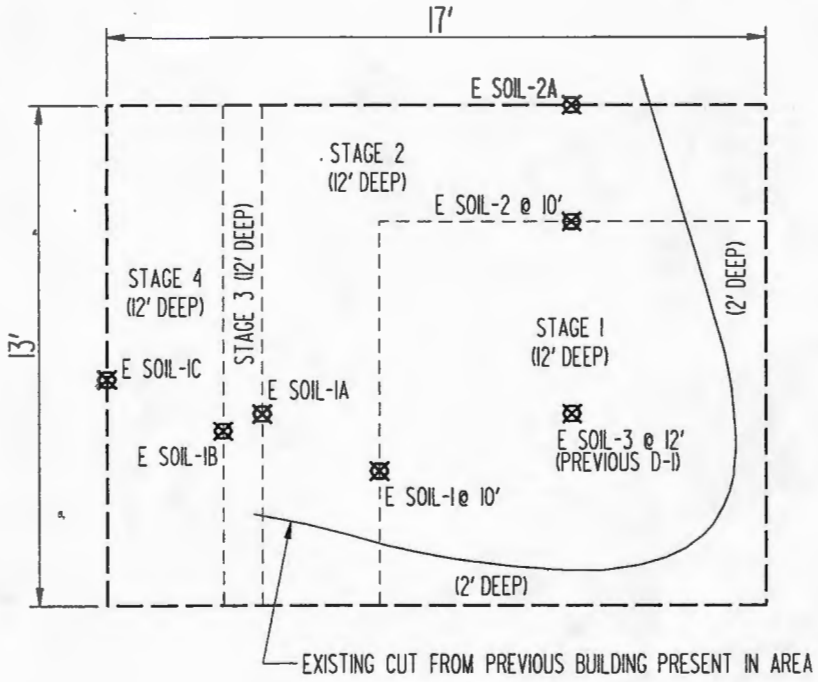
J:/DGN/2005/04124912.DG

SCALE: 1" = 10'	DATE: 8-11-05	PROJECT NO: 2004.1249.12	TITLE: OTHER CHEMICAL EXCAVATION/SOIL VERIFICATION SAMPLE LOCATION PLAN GEORGIA STATE UNIVERSITY HOUSING
PREPARED: VPV	CHECKED:	REVISIONS:	
CLIENT: AMBLING DEVELOPMENT COMPANY			

UNITED CONSULTING
770 - 209-0029 FAX 582-2900
E-MAIL ADDRESS UNITED@UNITEDCONSULTING.COM
WEB SITE WWW.UNITEDCONSULTING.COM

FIG. 14

J:/DGN/2005/04124912.DG



NOTE:
SIDE WALL SAMPLES COULD NOT BE OBTAINED FROM EAST OR SOUTH WALLS BECAUSE THESE AREAS WERE ALREADY AT ±10' BELOW TOP GRADE.
SEE TEXT & PHOTOGRAPHS FOR DESCRIPTION.

EXCAVATION PIT E

LEGEND
⊠ SAMPLE LOCATION

SCALE: 1" = 5'
DATE: 8-17-05
PREPARED: VPV
CHECKED:
PROJECT NO: 2004.1249.12
REVISIONS:
CLIENT: AMBLING DEVELOPMENT COMPANY

TITLE: METALS EXCAVATION/SOIL VERIFICATION SAMPLE LOCATION PLAN GEORGIA STATE UNIVERSITY HOUSING

UNITED CONSULTING
770 - 209-0029 FAX 582-2900
E-MAIL ADDRESS UNITED@UNITEDCONSULTING.COM
WEB SITE WWW.UNITEDCONSULTING.COM

FIG. 15

J:/DGN/2005/04124912.DGN

TABLE 1: KNOWN SOIL ANALYTICAL TESTING DATA

CONSULTANT	BORING	DEPTH	TPH			PCBs	METALS					VOCs									PAHs																			
			TPH-DRO	TPH-GRO	TPH-EXT	PCBs	Arsenic	Barium	Chromium	Lead	Mercury	Acetone	Benzene	Ethyl-Benzene	Isopropylbenzene	Methylcyclohexane	Methyl tert-butyl ether	PCE	Toluene	Xylenes	1,1'-Biphenyl	2-Methylnaphthalene	Naphthalene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(ghi)perylene	Benzo(k)fluoranthene	Carbazole	Chrysene	Dibenz(a,h)anthracene	Dibenzofuran	Fluoranthene	Fluorene	Indeno(1,2,3)pyrene	Phenanthrene	Pyrene
UNITED CONSULTING	D-1	10	820	350	-	-	7.79	113	31.6	296	0.223	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
										(<0.05 mg/L)																															
	D-2	5	BRL	BRL	-	-	BRL	17.7	13.5	7.66	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	D-3	2	200	BRL	-	-	BRL	104	28	78.2	0.412	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	C-2A	10	900	1800	-	-	BRL	141	44.2	13.1	BRL	BRL	BRL	BRL	BRL	BRL	BRL	0.79E	BRL	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		15	2100	770	-	-	BRL	234	65.2	13.7	BRL	BRL	BRL	BRL	1.9	BRL	BRL	4	BRL	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	C-2AA	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<0.1 mg/L*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	C-2B	Surface1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.071	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.41E	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	C-2C	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	C-2D	Surface1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.0094	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	C-2E	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	C-2F	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	C-2G	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	C-9A	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.0015E	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	HA-1	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.0018E	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	HA-2A	4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	EB-1	5	-	-	-	-	-	-	-	-	-	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	EB-2	5	-	-	-	-	-	-	-	-	-	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	EB-3	5	-	-	-	-	-	-	-	-	-	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	EB-4B	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	EB-5B	15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	EB-6	10	-	-	-	-	BRL	223	50.4	8.72	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	EB-7	10	-	-	-	-	BRL	123	39	22	BRL	0.084	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	EB-8	10	-	-	-	-	BRL	159	49.5	11	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	CYB-1	1.5-3.5	-	-	-	-	11.2	255	13.7	172	0.74	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
										(0.0738 mg/L)																															
	CYB-2	2.0-4.0	-	-	-	-	BRL	72.7	13	17.1	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	0.054	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	CYB-3	1.0-3.0	-	-	-	-	BRL	65.9	25.8	26.2	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	0.39	0.38	0.56	BRL	BRL	BRL	0.45	BRL	BRL	1.1	BRL	BRL	0.8	0.79
	CYB-4	1.0-3.0	-	-	-	-	BRL	13	105	12.9	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	CYB-5	1.0-3.0	-	-	-	-	8.82	80.6	38.3	84.3	1.08	BRL	BRL	BRL	0.007	BRL	0.0044	BRL	BRL	0.0036	0.025	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
											(<0.0004 mg/L)																													
	SAB-1	1.0-3.0	-	-	BRL	-	BRL	46.1	14.4	11.5	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
		9.0-11	-	-	-	-	BRL	32.4	7.73	7.22	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	SAB-2	1.0-3.0	-	-	BRL	-	BRL	30.3	5.71	24.6	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
		9.0-11	-	-	-	-	BRL	105	8.64	7.89	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	SAB-3	2.0-4	-	-	BRL	-	BRL	111	24.5	10.4	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
		9.0-11	-	-	-	-	BRL	119	8.83	7.08	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	SAB-4	1.0-3.0	-	-	BRL	-	BRL	23	12.5	18	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
		8.0-10	-	-	-	-	BRL	41.2	11.5	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	SAB-5	2.0-4.0	-	-	660	-	BRL	53.8	24.5	14.6	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	0.0043	0.0064	BRL	0.54	1.6	1.2	9.1	34	45	25	41	14	11	18	43	5.9	8.5	120	15	74	130	78
		8.0-10	-	-	-	-	BRL	81.3	9.01	11.7	BRL	BRL	BRL	BRL	BRL	BRL	BRL	0.0053	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	SAB-6	1.0-3.0	-	-	BRL	-	BRL	99.1	45.6	14.7	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
		9.0-11	-	-	-	-	BRL	21.6	15.4	5.61	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	SAB-7	1.0-3.0	-	-	-	-	BRL	50.6	18.6	9.58	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	SAB-8	1.0-3.0	-	-	-	-	BRL	33.5	9.62	21.6	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	SAB-9	1.0-3.0	-	-	-	-	BRL	17	25	14.4	BRL	BRL	BRL	BRL	BRL	BRL	BRL	0.012	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	D-1 Metal	10	-	-	-	-	-	-	-	47.3	0.394	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	D-1 Metal A	6	-	-	-	-	-	-	-	152	0.511	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
										(<0.05 mg/L)	(<0.004 mg/L)																														
	D-1 Metal B	11	-	-	-	-	-	-	-	18	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-9 PCB	10	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-26 PCB	10	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-28 PCB	10	-	-	-	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
CLAYTON	TW-1	14-16	BRL	BRL	-	-	-	-	-	-	-	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	TW-2	4 6	2400	BRL	-	-	-	-	-	-	-	BRL	BRL	BRL	BRL	BRL	BRL	BRL	0.026	0.089	BRL	0.39	0.012	0.34	0.85	2.3	3.2	2.1	0.79	1.8	BRL	2.3	BRL	BRL	6	0.36	0.75	4.7	5.2
	TW-4	29-31	4 4	BRL	-	-	-	-	-	-	-	0.11	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
GOLDER	AS-2	12	9100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-3	12	96	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-6	12	67	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-7	12	16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-8	4	35	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		12	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-9	5	54000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
		12	110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-12	4	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		12	110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-13	12	2200	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	AS-16	12	180	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-17	4	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		12	29	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-18	12	13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-20	12	12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-22	8	11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		12	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-23	12	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-24	4	5800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
		12	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-25	12	BRL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-26	6	10000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	1.2	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	2.7	BRL	BRL	3.8	BRL	BRL	3.5	5.8
		12	34	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-27	8	12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		12	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	AS-28	10	8300	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	0.48	0.42	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
		12	3800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	AS-29	8	16000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	69	21	BRL	9.4	11	8.6	11	BRL	BRL	BRL	12	BRL	BRL	37	16	BRL	49	29
		12	21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	BS-1	12	3500	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	BS-2	8	6400	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	BS-4	12	11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	BS-6	12	81	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	UST-1	12	250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
BETHOUR	#1	NR	124	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	#2	NR	136	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	#3	NR	92	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	#4	NR	199	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
STANDARD	NC		NA	NA	NA	1.55	41	500	1200	400	17	2.74	0.02	20	21.88	NA	NA	0.18	14.4	20	NA	NA	100	130	500	5	1.64	5	500	5	NA	5	5	NA	500	360	5	110	500
	Type I RRS		NA	NA	NA		20	1000	100	75	0.5	400	0.5	70	21.88	2190	157	0.5	100	1000	32000	12800	100	130	500	5	1.64	5	500	5	747	5	2.05	1280	500	360	5	110	500
	Type 2 RRS						8.96			270	2.09																												
	UST		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	11.3	140	NA	NA	NA	NA	500	700	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

NOTES

*. Sample submitted for CVOC by TCLP. Result in milligram per liter (mg/L).

1. Soils directly below concrete slab

NC: Notification concentration under the Hazardous Site Response Act

BRL: Below laboratory reporting limit

NR: Not reported but likely below the bases of the former USTs

NA: Not available

-- Not analyzed

E: Laboratory estimated number due to matrix interference

Concentrations (#) are TCLP results

Constituents not listed were below laboratory reporting limits

Bold concentrations are greater than the respective NC

Italicized concentrations are greater than the respective Type I RRS

Shaded concentrations are greater than the respective Type 2 RRS

Underlined concentrations are greater than the respective UST threshold concentrations

United Consulting soil samples submitted for TPH-DRO/GRO, RCRA Metals, CVOC, VOC and/or PAH analysis

Clayton soil samples submitted for TPH-DRO/GRO, VOC and/or SVOC analysis

Golder soil samples submitted for TPH-GRO and/or PAH analysis

All results in milligrams per kilogram (mg/Kg), unless otherwise noted

TABLE 2: KNOWN GROUNDWATER ANALYTICAL TESTING DATA

CONSULTANT	BORING	Lead	1,2-Dichlorobenzene	Benzene	Cyclohexane	Ethyl-Benzene	Toluene	Isopropylbenzene	Methylcyclohexane	MTBE	Xylenes	1,2-Dichloroethane	PCE	2-Methylnaphthalene	Naphthalene
UNITED CONSULTING	D-1B	–	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	–	–
	D-2	–	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	–	–
	D-3	–	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	–	–
	C-2AA	–	BRL	BRL	5.1	BRL	BRL	14	23	BRL	BRL	BRL	BRL	–	–
	C-2B	–	10	BRL	15	99	BRL	81	17	BRL	560	BRL	BRL	–	–
	C-2B*	–	BRL	BRL	BRL	BRL	BRL	540000	460000	BRL	1450000	BRL	BRL	–	250
	C-2C	–	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	C-2D	–	BRL	7.2	BRL	BRL	BRL	5.2	5.8	BRL	BRL	BRL	BRL	–	–
	C-9A	–	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	–	–
	EB-1	–	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	EB-2	–	BRL	BRL	BRL	BRL	BRL	BRL	BRL	7500	BRL	BRL	BRL	BRL	BRL
	EB-3	–	BRL	43	BRL	BRL	BRL	BRL	BRL	80	41	BRL	8.2	–	–
	EB-5B	–	BRL	BRL	BRL	BRL	BRL	BRL	BRL	4200	BRL	13	BRL	BRL	BRL
	EB-9	–	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
	PW-1	BRL^	–	–	–	–	–	–	–	–	–	–	–	–	–
CLAYTON	TW-1	–	BRL	BRL	–	BRL	BRL	–	–	–	BRL	BRL	1.6	BRL	BRL
	TW-2	–	BRL	BRL	–	BRL	BRL	–	–	–	BRL	BRL	BRL	BRL	BRL
	TW-4	–	BRL	***380***	–	1.9	26	–	–	–	89	BRL	BRL	5.9	12
STANDARD	**MCL**	**0.015**	**600**	**5**	NS	**700**	**1000**	NS	NS	NS	NS	**10000**	**5**	**5**	NS	NS
	ISWQS	*1.3*	*17000*	*72*	NS	*28718*	*200000*	NS	NS	NS	NS	*96.8*	*8.85*	NS	NS
	Type 1 RRS	0.015	NS	5	NS	700	1000	NS	NS	NS	10000	5	5	NS	20
	Wastewater		3740	20	NS	70	200	NS	NS	NS	1000	NS	NS	NS	NS

NOTES

BRL: Below laboratory reporting limit

–: Not analyzed

NS: No standard currently exists

Constituents not listed were below laboratory reporting limits

*: Approximately 8 inches of free porduct observed on 5/23/05, product was submitted for analytical testing of VOC. The groundwater beneath the product was submitted for analytical testing of PAHs

^: BRL on both total and disolved samples obtained

Bold concentrations are greater than the respective MCL

Italicized concentrations are greater than the respective ISWQS

Underlined concentrations are greater than the respective Type 1 RRS

Shaded concentrations are greater than the respective permitted wastewater discharge concentration

United Consulting groundwater samples submitted for VOC and/or PAHs

Clayton groundwater samples submitted for VOC and SVOC analysis

Wastewater: Permitted wastewater discharge concentration per City of Atlanta, Office of Environmental Compliance, Division of Inspection and Monitoring

All results in milligrams per kilogram (ug/L)

TABLE 3: AIR ANALYTICAL TESTING DATA

BORING	Benzene	Toluene	Xylenes	TRPH	Methylene Chloride	Vinyl Chloride
C-2AA	BRL	BRL	BRL	BRL	BRL	BRL
C-2B	**13**	**14**	**180**	2500	BRL	BRL
C-2C	BRL	BRL	BRL	BRL	BRL	BRL
Room AS-1	BRL	BRL	BRL	240	BRL	BRL
TAIC	**0.0031**	**0.4**	**7**	**NS**	**0.052**	**0.0028**

NOTES

BRL: Below laboratory reporting limit

–: Not analyzed

TRPH: Total recoverable petroleum hydrocarbons

TAIC: Target indoor air concentration , Risk = 1 X 10-5, from Table 2b, Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway From Groundwater and Soil

Constituents not listed were below laboratory reporting limits

Air samples submitted for analytical testing of VOCs by EPA method 18

All results in milligrams per kilogram (ug, total or micrograms per liter-ug/L)

TABLE 4 GROUNDWATER ELEVATIONS

Monitoring Well	Date	TOC Elevation	GS Elevation	Groundwater Depth	Groundwater Elevation
D-1B	26-Jan-05	1006.33	1003.4	34.08	972.25
D-2	26-Jan-05	986.11	985.99	15.34	970.77
D-3	26-Jan-05	983.25	982.4	16.81	966.44
C-2AA	26-Jan-05	988.77	986.39	21.28	967.49
	17-May-05			20.46	968.31
C-2B	26-Jan-05	990.47	986.52	24.6	965.87
	17-May-05			21.86	968.61
C-2C	26-Jan-05	990.16	986.43	19.16	971
	17-May-05			18.19	971.97
C-2D	26-Jan-05	986.63	986.41	21.49	965.14
	17-May-05			20.78	965.85
C-9A	26-Jan-05	991.17	986.36	25.27	965.9

Notes:

TOC: Top of Casing

GS: Ground Surface

All measurements recorded in feet.

Elevations are relative to each other. These elevations should be considered approximate.

TABLE 5: TYPE I SOIL RISK REDUCTION STANDARD CALCULATIONS

PARAMETERS	REF. DOSE ORAL	REF. DOSE INHILATION	SLOPE FACTOR (SFo) ORAL	SLOPE FACTOR (SFI) INHILATION	SOLUBILITY	(Di) MOLECULAR DIFFUSSIVITY	(Dei) EFFECTIVE DIFFUSSIVITY	(H) HENRY'S CONSTANT	Koc	Kd	α	VF	EQ. 6 PRG	EQ. 7 PRG	HSRP NC	MCL X 100	TCLP	TYPE I RRS
CONSTITUENT	(mg/kg-d)	(mg/kg-d)	1/(mg/kg-d)	1/(mg/kg-d)	(mg/l-water)	(cm2/s)	(cm2/s)	(atm-m3/mol)	(cm3/g)	(cm3/g)	(cm2/s)	(m3/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/l)	(mg/kg)
RCRA METALS																		
Arsenic															41	5		20
Barium															500	200		1000
Chromium															1200	10		100
Lead (see notes)															400	1.5		75
Mercury															17	0.2		0.5
VOCs																		
2-Butanone	6.00E-01	1.40E+00	NA	NA	223000	0.0808	0.0571256	2.97E-05	3.827	0.07654	1.84E-04	1.06E+04	NA	6.09E+04	0.79	200		200
Acetone	9.00E-01	NA	NA	NA	1000000	0.124	0.087668	0.00182	1.981	0.03962	2.23E-02	7.23E+02	NA	NA	2.74	400		400
Benzene	4.00E-03	8.57E-03	5.50E-02	2.73E-02	1790	0.088	0.062216	2.27E-01	165.5	3.31	2.28E-02	6.12E+02	2.52E+00	2.53E+01	0.02	0.5		0.5
Cis-1,2 Dichloroethene	1.00E-02	1.00E-02	NA	NA	3500	0.0736	0.0520352	7.36E-03	43.79	0.8758	3.41E-03	2.31E+03	NA	1.11E+02	0.53	70		0.53*
Cyclohexane	1.70E+00	1.70E+00	NA	NA	55	NA	NA	1.94E-01	165	3.3	NA	NA	NA	NA	20	NA		20
Ethyl-benzene	1.00E-01	2.86E-01	NA	3.85E-03	169	0.075	0.053025	3.22E-01	517.8	10.356	1.09E-02	1.10E+03	NA	1.49E+03	20	70		70
Isopropylbenzene	1.00E-01	1.10E-01	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	6.40E+04	21.88	NA		21.88
Methylcyclohexane	8.60E-01	8.60E-01	NA	NA	14	0.0986	0.0697102	4.23E-01	268	5.36	2.77E-02	5.24E+02	NA	2.19E+03	NA	NA		2190
Methyl tert butyl ether	8.60E-01	8.60E-01	1.80E-03	1.80E-03	51000	0.1024	0.0723968	5.41E-04	5.258	0.10516	2.98E-03	2.54E+03	1.57E+02	1.04E+04	NA	NA		157
Tetrachloroethene	1.00E-02	1.71E-01	5.40E-01	2.10E-02	206	0.072	0.050904	7.24E-01	106.8	2.136	3.76E-02	1.95E+02	1.02E+00	1.58E+02	0.18	0.5	<0.1	0.5
Toluene	2.00E-01	1.14E-01	NA	NA	526	0.087	0.061509	2.71E-01	268	5.36	1.82E-02	7.53E+02	NA	4.17E+02	14.4	100		100
Trichloroethene	3.00E-04	1.00E-02	4.00E-01	4.00E-01	1280	0.079	0.055853	1.16E-02	67.7	1.354	3.71E-03	2.22E+03	6.19E-01	6.91E+01	0.13	5		0.5*
Xylenes (Total)	2.00E-01	2.86E-02	NA	NA	106	0.0714	0.0504798	2.71E-01	443.1	8.862	1.02E-02	1.14E+03	NA	1.58E+02	20	1000		1000*
SVOCs																		
1,1 Biphenyl	5.00E-02	5.00E-02	NA	NA	6.94	0.0404	0.0285628	NA	6250	125	NA	NA	NA	3.20E+04	NA	NA		32000
2-Methylnaphthalene	2.00E-02	8.57E-04	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.28E+04	NA	NA		12800
Acenaphthylene	3.00E-02	3.00E-02	NA	NA	16.1	0.0438669	0.031013898	5.11E-03	6123	122.46	1.08E-05	4.40E+04	NA	4.82E+03	1.30	NA		130
Anthracene	3.00E-01	NA	NA	NA	0.0434	0.0324	0.0229068	2.27E-03	20400	408	1.06E-06	1.40E+05	NA	1.92E+05	500	NA		500
Benzo(a)anthracene	NA	NA	7.30E-01	3.08E-01	4.34E-02	NA	NA	NA	NA	NA	NA	NA	2.05E+01	NA	5	0.01		5
Benzo(a)pyrene	NA	NA	7.30E+00	3.08E+00	0.00162	0.043	0.030401	1.87E-05	787000	15740	3.01E-10	6.33E+06	2.03E+00	NA	1.64	0.02		1.64
Benzo(b)fluoranthene	NA	NA	7.30E-01	3.08E-01	0.0015	0.0226	0.0159782	2.69E-05	803000	16060	2.23E-10	9.68E+06	2.04E+01	NA	5	0.02		5
Benzo(g,h,i)perylene	3.00E-02	3.00E-02	NA	NA	0.00026	NA	NA	1.35E-05	2680000	53600	NA	NA	NA	1.92E+04	500	NA		500
Benzo(k)fluoranthene	NA	NA	7.30E-02	3.08E-02	0.0008	0.0226	0.0159782	2.39E-05	787000	15740	2.02E-10	1.02E+07	2.04E+02	NA	5	NA		5
Carbazole	NA	NA	2.00E-02	2.00E-02	1.8	0.039	0.027573	NA	11300	226	NA	NA	7.47E+02	NA	NA	NA		747
Chrysene	NA	NA	7.30E-03	3.08E-03	0.002	0.0248	0.0175336	2.14E-04	236000	4720	6.62E-09	1.78E+06	1.98E+03	NA	5	0.02		5
Dibenz(a,h)anthracene	NA	NA	7.30E+00	3.08E+00	0.00103	0.0202	0.0142814		2620000	52400	NA	NA	2.05E+00	NA	5	0.03		2.05
Dibenzofuran	2.00E-03	2.00E-03	NA	NA	3.1	NA	NA	NA	11300	226	NA	NA	NA	1.28E+03	NA	NA		1280
Fluoranthene	4.00E-02	NA	NA	NA	0.26	0.0302	0.0213514	3.62E-04	70900	1418	4.54E-08	6.78E+05	NA	NA	500	100		500
Fluorene	4.00E-02	NA	NA	NA	1.89	0.0363	0.0256641	3.93E-03	11300	226	3.72E-06	7.50E+04	NA	NA	360	100		360
Indeno(1,2,3-cd)pyrene	NA	NA	7.30E-01	3.08E-01	0.00019	0.019	0.013433	1.42E-05	2680000	53600	2.96E-11	2.66E+07	2.04E+01	NA	5	0.04		5
Naphthalene	2.00E-02	8.57E-04	NA	NA	31	0.059	0.041713	1.80E-02	1837	36.74	1.70E-04	1.11E+04	NA	4.60E+01	100	2		100
Phenanthrene	3.00E-02	3.00E-02	NA	NA	1.15	NA	NA	1.73E-03	20800	416	NA	NA	NA	1.92E+04	110	NA		110
Pyrene	3.00E-02	3.00E-02	NA	NA	0.135	0.0272	0.0192304	4.87E-04	69400	1388	5.62E-08	6.10E+05	NA	1.92E+04	500	100		500

NOTES:

VOC is volatile organic compounds

HSRP NC is the notification concentration under the Hazardous Site Response Program (HSRP)

NA indicates values not available

Toxicity and chemical specific values from EPA Region 9 PRG table and other sources as ref. in the RRS section of the VCSR

RRSc Based on Equation 6 of RAGS, Volume I, Part B

RRSnc Based on Equation 7 of RAGS, Volume I, Part B

VF Based on Equation 8 of RAGS, Volume I, Part B

Type I RRS is highest of NC/MCL X 100/TCLP then the lowest of those/EQ. 6/EQ. 7 or from Table 2 of Appen. III for metals, except * concentrations, which were values verbally specified by EPD on 9/1/05

EQ. 6/RRS_c = $\frac{TR*BW*AT_a*365\ days/yr}{EF*ED*[(CSF_o*10^{-6}kg/mg*IR_a)+(CSF_i*IR_a*[1/VF+1/PEF])]}$

EQ. 7/RRS_{nc} = $\frac{THI*BW*ATnc*365\ days/yr}{EF*ED*[(1/RfDo*10\text{-}6kg/mg*IRa)+(1/RfDi*IRa*[1/VF+1/PEF])]}$

Residential Parameters	EQ. 6	EQ. 7	UNITS
CHEMICAL CONCENTRATION-C			
TARGET RISK-TR	1.00E-05	1.00E-05	Unitless
BODY WEIGHT-BW	70	70	KG
AVERAGING TIME-AT	70	30*	YEARS
EXPOSURE FREQUENCY-EF	350	350	D/Y
EXPOSURE DURATION-ED	30	30	YEARS
SOIL INGESTION RATE-IRs	114	114	MG/D
WORKDAY INHILATION RATE-IRa	15	15	M3/D
PARTICULATE EMISSION FACTOR-PEF	4.63E+09	4.63E+09	M3/KG
ORGANIC CARBON-OC	0.02	0.02	Unitless
SOIL MOISTURE CONTENT-NM	0.2	0.2	G/G
SOIL MOISTURE CONTENT-OM	0.2	0.2	LW/KGS

Parameters per IISRA, Table 3, Appendix III and RAGS, Volume I, Part B, except * value, which was verbally specified by EPD on 9/1/05

TABLE 6: TYPE 2 SOIL RISK REDUCTION STANDARD CALCULATIONS

PARAMETERS	C_M	EPD	MCL	MCL*	REF. DOSE (RfDo)	REF. DOSE (RfDi)	SLOPE FACTOR	SLOPE FACTOR	SOLUBILIT	(Di)	(Dei) EFFECTIVE	(H) HENRY'S	(H') HENRY'S	Koc	Kd	α	VF	Ow	Oa	Pb	EQ. 6 PRG	EQ. 7 PRG	EQ 4-10	TYPE 2 RRS
	Max. Conc.	TOXICITY		DAF	ORAL	INHILATION	(SFo) ORAL	(SFi) INHILATION		DIFFUSSIVITY	DIFFUSSIVITY	CONSTANT	CONSTANT											
CONSTITUENT	(mg/kg)	VALLUE	(mg/L)	(DAF=20)	(mg/kg-d)	(mg/kg-d)	1/(mg/kg-d)	1/(mg/kg-d)	(mg/l-water)	(cm2/s)	(cm2/s)	(atm-m3/mol)	(unitless)	(cm3/g)	(cm3/g)	(cm2/s)	(m3/kg)	(L/L)	(L/L)	(kg/L)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
Arsenic	32	16	0.05	1	3.00E-04	NA	1.50E+00	1.50E+01	34700	NA	NA	0.00E+00	0.00E+00	14.3	29	NA	NA	0.3	0.134	1.5	9.96E+00	1.92E+02	2.92E+01	9.96
Mercury and Compounds	0.557	16	0.002	0.04	3.00E-04	NA	NA	NA	0.06	0.037	0.026159	1.14E-02	4.67E-01	14.3	0.286	6.52E-03	1.34E+03	0.3	0.134	1.5	NA	1.92E+02	2.09E+00	2.09E+00
Mercury (elemental)	0.557	16	0.002	0.04	NA	8.60E-05	NA	NA	0.06	0.037	0.026159	1.14E-02	4.67E-01	14.3	0.286	6.52E-03	1.34E+03	0.3	0.134	1.5	NA	5.91E+03	2.09E+00	2.09E+00
Mercury (methyl)	0.557	16	0.002	0.04	1.00E-04	NA	NA	NA	0.06	0.037	0.026159	1.14E-02	4.67E-01	14.3	0.286	6.52E-03	1.34E+03	0.3	0.134	1.5	NA	6.40E+01	2.09E+00	2.09E+00
Silver	8.21	4	0.1	2	5.00E-03	NA	NA	NA	70500	NA	NA	0.00E+00	0.00E+00	14.3	8.3	NA	NA	0.3	0.134	1.5	NA	3.20E+03	1.70E+01	1.70E+01

NOTES:

C_m is Maximum concentrations detected at the Project Site in milligrams per kilogram (mg/kg)

EPD Toxicity values from HSRP, Guidance Manual for Reportable Quantities Screening Method

NA indicates values not available

Toxicity and chemical specific values from EPA Region 9 PRG table and other sources as ref. in the RRS section of the VCSR

RRSc Based on Equation 6 of RAGS, Volume I, Part B

RRSnc Based on Equation 7 of RAGS, Volume I, Part B

VF Based on Equation 8 of RAGS, Volume I, Part B

SSL Based on Equation 4-10 of Supplemental Guidance for Soil Screening Levels for Superfund Sites (SGDSSL)

Type 2 RRS is least of EQ. 6, EQ. 7, or EQ. 4-10

EQ. 6/RRS_c = $\frac{TR*BW*AT_c*365\ days/yr}{EF*ED*[(CSF_o*10^{-6} kg/mg*IR_s)+(CSF_i*IR_a*(1/VF+1/PEF))]}$

EQ. 7/RRS_{nc} = $\frac{THI*BW*AT_{nc}*365\ days/yr}{EF*ED*[(1/RfDo*10-}$

EQ. 4-10 SSL= Cw[Kd+(Ow+Oa(H)/Pb)]