

# RELEASE NOTIFICATION FORM

**HAZARDOUS SITES RESPONSE PROGRAM**  
**GEORGIA ENVIRONMENTAL PROTECTION DIVISION**  
 (Please type or print legibly)

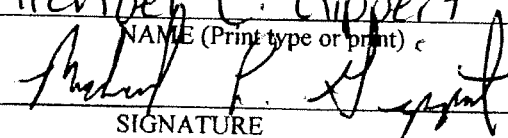
**RECEIVED**  
 Georgia EPD  
**APR - 2 2009**  
 Hazardous Sites  
 Response Program

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

## PART I - PROPERTY INFORMATION

2	EPA ID NUMBER (if applicable)					
3	Tax Map and Parcel ID Number:	13050B L007				
4	Site or Facility Name	Judson Transmission Service				
5	Site Street Address	861 Main Street				
6	Site City	Forest Park	County	Clayton	Zip	30297
7	Property Owner	City of Forest Park				
8	Property Owner Mailing Address	745 Forest Parkway				
9	Property Owner City	Forest Park	State	GA	Zip	30297
10	Property Owner Telephone No.	404-366-4720				
11	Site Contact Person	Mike Gippert	Title	Director of Public Works		
12	Company Name	City of Forest Park				
13	Site Contact Mailing Address	Same as above				
14	Site Contact City		State		Zip	
15	Site Contact Telephone No.					
16	Facility Operator		Title			
17	Company Name					
18	Facility Operator Mailing Address					
19	Facility Operator City		State		Zip	
20	Facility Operator Telephone No.					

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

Michael L. Gippert  
 NAME (Print type or print) c  
  
 SIGNATURE

TITLE Director  
 DATE 3/26/09

**PART II - - RELEASE INFORMATION**

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

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

The source for the groundwater impact at the Project Site is unknown. However, current data suggests the two former nearby (within 100 feet) dry cleaning facilities, Tuffy's Coin Laundry and Forest Park Floor and Wall Covering, are potential sources.

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

Unknown

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

A Limited Phase II Environmental Assessment was performed to assess potential impacts to the Project Site from historical use of the site and several off-site regulated facilities identified during a previous Phase I Environmental Assessment. Three direct push probes were advanced and soil and groundwater sampling was performed. Additional details are provided in the Site Summary.

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

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

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

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

Not applicable. No soil impacts were detected in the samples collected.

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

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

**PART II - - RELEASE INFORMATION**

(continued)

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

Less than 300 feet  
 301 to 1000 feet

1001 to 3000 feet  
 3001 to 5280 feet

Greater than 1 mile

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

Name: Unknown

Address: 4883 Evans Drive

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

Less than .05 miles  
 0.5 to 1 mile

1 to 2 miles  
 2 to 3 miles

Greater than 3 miles

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

Name: Smith, H

Address: Rex Road

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

Yes  No

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

Not applicable. Property located in general industrial area

**REQUIRED ATTACHMENTS**

9. **SITE SUMMARY**

A. Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwise remediate the property. The summary shall include a description of the property boundaries of the site and adjacent properties as well as a detailed description of the nature and known or estimated extent of the area of contamination. Describe any additional relevant information concerning the nature of the release. In addition to the one page summary, other information concerning the property may also be attached. **SEE ATTACHMENT 9A: Site Summary**

B. Attach a site map that shows known or suspected sources as well as the locations of all samples collected at the site. The site map should include outlines of buildings as well as covered ground areas (e.g., parking lots or other paved areas). A legend should be provided to explain any symbols used on the map. **SEE ATTACHMENTS 9B1 & 9B2: Figures**

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

Along with this form, you **MUST** submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. See instructions for information on how to obtain an original of the map on which your site is located. **SEE ATTACHED USGS Map.**





### ATTACHMENT 9A: Site Summary

The Project Site is located at 861 Main Street in Forest Park, Clayton County, Georgia, and consisted of an approximate 0.29-acre tract of land that was bounded to the north by Main Street, to the south by Central of Georgia Railroad, to the east by Ash Street, and to the west by a strip shopping center. The location of the Project Site is illustrated on Attachment 9B1.

The site is part of a master redevelopment plan for this section of Forest Park. At this time, plans include the construction of a parking deck in this area. The Project Site was most recently developed with the Judson Transmission Service facility and associated parking areas. Based on historical research during a previous Phase I Environmental Assessment, the Project Site was developed as a gas station and automobile service facility in the mid-1950s. Attachment 9B1 shows the location of the Site.

A Limited Phase II Environmental Assessment was performed to assess potential impacts to the Project Site from historical use of the site and several off-site regulated facilities identified during the previous Phase I Environmental Assessment. The off-site facilities included two leaking UST facilities and two historical dry cleaning facilities (Tuffy's Coin Laundry and Forest Park Floor and Wall Covering). These dry cleaning facilities were within 100 feet to the west of the Project Site.

The investigation included advancing three direct push probes, which were converted into temporary groundwater monitoring wells, designated TWM-1 through TMW-3. Direct push probe TMW-1 was located on the western, down-gradient, portion of the Project Site and adjacent to the on-site building. This was the nearest boring to the historic dry cleaning facilities. Direct push probe TMW-2 was located on the central portion of the Project Site between two potential fuel dispenser islands. Direct push probe TMW-3 was drilled on the eastern portion of the Project Site adjacent to the UST pit. The locations of the borings are illustrated on Attachment 9B2.

One soil sample was obtained from the direct push probes for analytical testing of volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs), total petroleum hydrocarbons-diesel and gasoline range (TPH-DRO/TPH-GRO), and total lead. The samples were collected from depths of 15, 5, and 15 feet below the existing grades, respectively. Analytical testing results did not indicate the presence of VOC, PAH, TPH-DRO, or TPH-GRO constituents in the samples collected. Very low concentrations of lead were detected in the three soil samples, with the concentrations being within the range for naturally-occurring lead in this geologic region.

One groundwater sample was collected from each of the temporary monitoring wells for analytical testing of VOCs, PAHs, and total lead. Lead and PAH constituents were not detected in the groundwater samples. Tetrachloroethene (PCE) was detected in the groundwater sample collected from temporary monitoring well TMW-1 at a relatively low concentration of 8.4 micrograms per liter (ug/L). Re-sampling of TMW-1 confirmed the presence of PCE with a detected concentration of 9.0 ug/L. VOC constituents were not detected in the groundwater samples collected from TMW-2 or TMW-3.

The source for the groundwater impact at the Project Site is unknown. However, current data suggests the Tuffy's Coin Laundry and Forest Park Floor and Wall Covering facilities are potential sources.

Concurrent with this notification, United Consulting conducted a receptor survey. Information obtained through that receptor survey is attached to this notification package (Attachment C). Based on the Receptor Survey, no domestic wells were identified within one mile of the Project Site. The nearest domestic groundwater well to the Project Site is between one to two miles.

RQSM calculations were performed for the chemical detected in the groundwater. Since the current data suggests the Tuffy's Coin Laundry and Forest Park Floor and Wall Covering facilities are potential sources and no soil impacts were detected in the samples tested, the on-site pathway was not considered. As indicated above, no drinking water wells were identified within one mile of the area of the detected release. Further scoring justifications, which were all conservative, are included with the RQSM Calculations in Attachment D. Based on these conservative scoring calculations, the Groundwater Pathway score is 6.5 which is below the threshold of 10.

Based on this review, United Consulting does not believe that the Project Site should be listed on the HSI for the following reasons:

- The Project Site is located in an area of lower groundwater pollution susceptibility;
- No soil impacts were detected on the Project Site;
- The source(s) for the constituent may be from off-site;
- No on-site sensitive environment exists;
- The nearest domestic groundwater well to the Project Site is between one to two miles from the Project Site; and
- The calculated RQSM Groundwater Pathway score is below the applicable threshold of 10.



# RELEASE NOTIFICATION FORM

HAZARDOUS SITES RESPONSE PROGRAM  
 GEORGIA ENVIRONMENTAL PROTECTION DIVISION  
 (Please type or print legibly)

RECEIVED  
 Georgia DOD  
 APR 17 2009  
 Hazardous Sites  
 Response Program

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

## PART I -- PROPERTY INFORMATION

2	EPA ID NUMBER (if applicable)	GAD 981269095			
3	Tax Map and Parcel ID Number:	14-0237-0001-018-7			
4	Site or Facility Name	ADAMSVILLE DRY CLEANERS			
5	Site Street Address	3206 MARTIN LUTHER KING, JR. DR			
6	Site City	ATLANTA	County	FULTON	Zip 30311
7	Property Owner	MS. CLARA MAUNEY			
8	Property Owner Mailing Address	835 CORLEY RD NW			
9	Property Owner City	CONYERS	State	GA	Zip 30012
10	Property Owner Telephone No.	404-290-3431			
11	Site Contact Person	MIKE MAUNEY	Title	AGENT	
12	Company Name	N/A			
13	Site Contact Mailing Address	835 CORLEY RD NW			
14	Site Contact City	CONYERS	State	GA	Zip 30012
15	Site Contact Telephone No.	404-290-3431			
16	Facility Operator	KAREEM PREMJI	Title	OWNER/OPERATOR	
17	Company Name	ADAMSVILLE DRY CLEANERS			
18	Facility Operator Mailing Address	3206 MARTIN LUTHER KING, JR. DR			
19	Facility Operator City	ATLANTA	State	GA	Zip 30311
20	Facility Operator Telephone No.	404-691-7769			

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

MICHAEL J. MAUNEY  
 NAME (Please type or print) TITLE AGENT  
 SIGNATURE DATE 4-13-09

**PART II -- RELEASE INFORMATION**

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

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

NONE / NO RELEASES

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

N/A

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

N/A

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

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

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

N/A

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

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

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

N/A

## PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

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

Less than 300 feet

1001 to 3000 feet

Greater than 1 mile

301 to 1000 feet

3001 to 5280 feet

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

Name: \_\_\_\_\_

N/A

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

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

Less than 0.5 miles

1 to 2 miles

Greater than 3 miles

0.5 to 1 mile

2 to 3 miles

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

Name: \_\_\_\_\_

N/A

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

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

Yes

No

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

N/A

### REQUIRED ATTACHMENTS

#### 9. SITE SUMMARY

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

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

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

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. See instructions for information on how to obtain an original of the map on which your site is located.





# RELEASE NOTIFICATION/REPORTING FORM



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

RECEIVED  
 Georgia EPD  
 APR 20 2009  
 Hazardous Sites  
 Response Program

1. The information provided in this form is for:

- Initial Release Notification  
 Supplemental Notification

## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	GAD 981283096			
3	Tax Map and Parcel ID Number:	see attached map & list	Acreage	~ 90	
4	Site or Facility Name	Commercial & Military Systems Company			
5	Site Street Address	2950 Mike Padgett Highway			
6	Site City	Augusta	County	Richmond	Zip 30906
7	Property Owner	Commercial & Military Systems Company c/o Edward J. Coleman, III Trustee			
8	Property Owner Mailing Address	801 Broad Street, Suite 901			
9	Property Owner City	Augusta	State	GA	Zip 30901
10	Property Owner Telephone No.	706-722-3302			
11	Site Contact Person	Darren Meadows	Title	Attorney	
12	Site Contact Company Name	Hull, Towill, Norman, Barrett & Salley, PC			
13	Site Contact Mailing Address	PO Box 1564			
14	Site Contact City	Augusta	State	GA	Zip 30903
15	Site Contact Telephone No.	706-722-4481			
16	Facility Operator Contact Person	N/A - Bankruptcy	Title		
17	Facility Operator Company Name				
18	Facility Operator Mailing Address				
19	Facility Operator City		State		Zip
20	Facility Operator Telephone No.				

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

*Edward J. Coleman, III*

NAME (Please type or print)

*Trustee*

TITLE

*[Handwritten Signature]*

SIGNATURE

*4-15-2009*

DATE

## PART II -- RELEASE INFORMATION

Page 2 of 5

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

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

Unknown, presume past operations.

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

Unknown.

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

Release discovered by prospective purchaser due diligence - copies of information received from prospective purchaser enclosed.

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

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

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

Property is currently completely fenced with locked gates. Neighboring business has purchased much of the inventory from bankruptcy auction, which has been stored on-site, thus neighbor has been keeping watch over property.

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

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

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

Varies - some buried waste materials were found, however all soil samples were below HSRA Notification threshold.

## PART II -- RELEASE INFORMATION

(Continued)

Page 3 of 5

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

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

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

Name: Multiple - Sherwood Subdivision across Mike Padgett Highway (see enclosed map)

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

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

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

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

Name: \*\*See enclosed 3 mile well survey - closest wells are upgradient; none downgradient w/in 3 miles

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

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

Yes       No

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

## REQUIRED ATTACHMENTS

### 9. SITE SUMMARY

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

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

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

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





## Site Summary

Commercial & Military Systems Company (CMS) was a military vehicle refurbishing operation. The property was assigned to the oversight of attorney Edward J. Coleman, III as Trustee of the Bankruptcy Estate of CMS in fall of 2006. On-site operations appear to have included engine, transmission and drive train tear-down and rebuilding, sand-blasting and painting. The property contains one office building, five large warehouse, assembly and operations buildings, and a few small sheds. The open rear acreage was the storage area for vehicles, both completed and those awaiting repair.

The Trustee received letters from the GAEPD Haz Branch and District Office shortly after obtaining the case. Issues of concern included drums of unknown contents, a sand pile, vehicles in various states of repair, radium-containing dials, and large numbers of tires. The drums were characterized and removed under appropriate manifesting procedures by Clean Environmental Management, Inc., with documentation submitted to GAEPD in 2007 & 2008. The sand pile was sampled by American Environmental & construction Services, Inc. (AECS.) No constituents were found above HSRA notification threshold, and TCLP analysis for lead in the sand confirmed it is not hazardous; this documentation was also previously provided to the other EPD offices. AECS has conducted a sweep for radium dials and found 22 which indicated low level radioactivity. Those dials have been set aside pending final arrangements for disposal with a qualified vendor, which should occur within the next 30 days. All vehicles and other inventory on the site, included a large number of reusable tires, were sold at auction in September 2007. Some tires remain, however the prospective purchaser, the County Board of Education of Richmond County, Georgia, has made arrangements with the EPD Scrap Tire Program for them to be removed post-closing.

With the exception of the sand below notification threshold mentioned above, all analytical data was collected by the prospective purchaser and delivered to Trustee's environmental counsel, Darren Meadows, on April 10, 2009. No soil conditions above HSRA notification threshold were indicated. Groundwater conditions are noted in the foregoing table of this Notification. A copy of all data supplied by the said prospective purchaser is included herein. AECS conducted a 3 mile radius well survey and determined no wells were within said radius downgradient of the site; a copy of this Well Survey Report is also enclosed.

Prospective purchaser also identified some buried waste materials at the site and we understand has already consulted with the EPD Brownfield Program and Land Protection Branch regarding appropriate protective or corrective measures to be implemented. It is our understanding that prospective purchaser will be submitting a Brownfield application concurrently with or shortly following the submission of this Notification.

# RELEASE NOTIFICATION/REPORTING FORM



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

RECEIVED  
 Georgia EPD  
 APR 20 2009  
 Hazardous Sites  
 Response Program

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

## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)					
3	Tax Map and Parcel ID Number:	18 184 05 017	Acreage	1		
4	Site or Facility Name	Redwood International Machinery, Inc.				
5	Site Street Address	1940 Forge Street				
6	Site City	Tucker	County	Dekalb	Zip 30084	
7	Property Owner	Constellation Partners, LLC				
8	Property Owner Mailing Address	1940 Forge Street				
9	Property Owner City	Tucker	State	GA	Zip 30084	
10	Property Owner Telephone No.	770-934-6500				
11	Site Contact Person	Mr. Doug MacClean	Title			
12	Site Contact Company Name	Redwood International Machinery, Inc				
13	Site Contact Mailing Address	1940 Forge Street				
14	Site Contact City	Tucker	State	GA	Zip 30084	
15	Site Contact Telephone No.	770-934-6500				
16	Facility Operator Contact Person		Title			
17	Facility Operator Company Name					
18	Facility Operator Mailing Address					
19	Facility Operator City		State		Zip	
20	Facility Operator Telephone No.					

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

DOUG MACLEAN  
 NAME (Please type or print)

Managing member  
 TITLE

[Signature]  
 SIGNATURE

4-17-09  
 DATE

## PART II -- RELEASE INFORMATION

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

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

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

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

As part of environmental due diligence associated with a real estate transaction, Soil samples were collected and subsequently, a monitoring well was installed at the location of detected compounds to facilitate the collection of a Groundwater sample. No further investigations have been completed to date.

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

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

If the site is inaccessible or has limited access, then describe site surveillance systems, fences, security personnel or other barriers that would restrict access to the release.  
Area investigated was located within a secured storage area surrounded by locked fence.

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

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

Describe the type and thickness of the material covering the contaminated soil or wastes.  
Approximately four-inch of concrete paved surface

## PART II -- RELEASE INFORMATION

(Continued)

Page 2 of 4

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

Less than 300 feet  
 301 to 1000 feet

1001 to 3000 feet  
 3001 to 5280 feet

Greater than 1 mile

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

Name: Residence: Edie Mae Williams

Address: 4481 Elmdale DR, Tucker

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

Less than 0.5 miles  
 0.5 to 1 mile

1 to 2 miles  
 2 to 3 miles

Greater than 3 miles

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

Name: USGS 12EE08

Address: 4900 Lewis Road, Stone Mountain, GA

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

Yes  No

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

## REQUIRED ATTACHMENTS

### 9. SITE SUMMARY

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

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

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

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





## 9A. Site Summary

The Redwood International Machinery facility is located at 1940 Forge Street in Tucker, DeKalb County, Georgia (subject property). The subject property encompasses approximately one acre and is improved with an approximately 17,500 square foot office/manufacturing building constructed in 1974. The current occupant of the subject property, Redwood International Machinery, refurbishes computer numerical control (CNC) punches, press brakes, shears, and other types of metal fabricating machinery. The subject property is located in an area characterized by light manufacturing/industrial facilities and is bound to the north by Hammermill Road and to the east by Forge Road. Abutting property to the south is a multi-tenant office/warehouse building with the following tenants: Adam Fleet Tire, Davis Sanitary Supply, American Paper Recycling and, Southern Equipment Sales. Abutting property to the west is Printed Communications, Inc.

A Phase I ESA was completed for the Subject Property during February 2009. Because of the Subject's historical operations and the suspected use of solvents and off-Site concerns regarding a former hazardous waste generator to the southwest, a Phase II ESA was conducted on March 19, 2009 at various locations on the Subject property to confirm the presence or absence of adverse environmental conditions. Ground water was not encountered prior to bedrock refusal. Analytical results of two soil samples (SB-3 and SB-4) located within the fenced storage yard at the north side of the building reported Trichloroethylene at concentrations of 270 and 240 micrograms per Kilogram, respectively. The soil samples were collected along a prominent fracture perpendicular to the grade and at a depth of 13-14 feet below ground surface. Because groundwater was not encountered prior to boring termination, a second mobilization was required to install a bedrock-monitoring well. On April 2, 2009, the bedrock monitoring well (TMW-1) was installed adjacent to SB-4 at a termination depth of 45 feet below ground surface and a groundwater sample was collected. Analytical results of the groundwater sample reported a concentration of Trichloroethylene at 800 micrograms per liter.

Based on the information presented in the Phase I and subsequent information obtained from Mr. Doug MacClean, the property does not currently use or within recent history has not used Trichloroethylene.



# RELEASE NOTIFICATION FORM

HAZARDOUS SITES RESPONSE PROGRAM  
 GEORGIA ENVIRONMENTAL PROTECTION DIVISION  
 (Please type or print legibly)

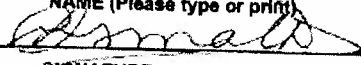
RECEIVED  
 Georgia EPD  
 APR 20 2009  
 Hazardous Sites  
 Response Program

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

## PART I - PROPERTY INFORMATION

2	EPA ID NUMBER (if applicable)	N/A			
3	Tax Map and Parcel ID Number:	N/A			
4	Site or Facility Name	Former CSX Rail Line			
5	Site Street Address	Abandoned Rail Line between East Broad Street and Wilkerson Street			
6	Site City	Athens	County	Clarke	Zip 30601
7	Property Owner	CSX Transportation, Inc.			
8	Property Owner Mailing Address	301 W. Bay Street, Suite 800, J-915			
9	Property Owner City	Jacksonville	State	FL	Zip 32202
10	Property Owner Telephone No.	904-633-4858			
11	Site Contact Person	Raghu Chatrathi	Title	Mgr. Env. Remediation	
12	Company Name	CSX Real Property, Inc.			
13	Site Contact Mailing Address	301 W. Bay Street, Suite 800, J-915			
14	Site Contact City	Jacksonville	State	FL	Zip 32202
15	Site Contact Telephone No.	904-633-4858			
16	Facility Operator	N/A	Title		
17	Company Name				
18	Facility Operator Mailing Address				
19	Facility Operator City		State		Zip
20	Facility Operator Telephone No.	REPRESENT			

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

RAGHU CHATRATHI MGR. ENV. REMEDIATION  
 NAME (Please type or print) TITLE  
 DATE  
 -SIGNATURE 04/16/09

## PART II -- RELEASE INFORMATION

Page 1 of 4

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

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

***Unknown.***

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

***Unknown.***

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

***Site soils were sampled in November 2008 and February 2009 during due diligence activities prior to a potential sale of the property.***

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

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

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

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

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

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

## PART II -- RELEASE INFORMATION

(Continued)

Page 2 of 4

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

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

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

Name: AB Stiles Enterprises LLC

Address: 820 East Broad Street, Athens, GA

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

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

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

Name: Athens-Clarke County Public Utilities (surface water intake)

Address: 800 Waterworks Drive, Athens, GA 30601

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

Yes                       No

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

### REQUIRED ATTACHMENTS

#### 9. SITE SUMMARY

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

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

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

Along with this form, you MUST submit an original U.S.G.S. topographical map (1:24000) with the geographic center of the site clearly marked. See instructions for information on how to obtain an original of the map on which your site is located.





## Site Summary

CSX Transportation (CSXT) owns property located between East Broad Street and Wilkerson Street in Athens, Clarke County, Georgia. The Site is located within the U.S.G.S. Athens East Quad (1986) topographic quadrangle map (Figure 1). The "Site" includes an abandoned railroad right-of-way (ROW) approximately 775 feet long and 150 feet wide (2.67 acres). The Site runs southeast from East Broad Street to Wilkerson Street. The Site is located in close proximity to the North Oconee River Greenway. The southern portion of the Site has some vegetation and the northern portion of the Site adjacent to East Broad Street is native soil and/or gravel covered. The eastern side of the Site is steeply sloped along the southern two-thirds of the Site.

The Site was historically used as a rail corridor that directly connected to a bridge that crossed the North Oconee River. The bridge has been demolished and the rail lines have been removed from the site. Nearby land use includes condominium/apartments, a city bus terminal, a building materials distributor, coffee shop, and small residential neighborhood.

Athens-Clarke County is interested in converting the rail corridor into part of the North Oconee River Greenway Trail. Prior to the sale, CSXT performed due diligence soil sampling in accordance with CSXT's Rails-to-Trails Protocol. Ten, two-point composite surface soil samples (0 to 1 ft below ground surface) were collected from the ROW and were analyzed for arsenic, lead, polycyclic aromatic hydrocarbons (PAHs), and total petroleum hydrocarbon diesel range organics (TPH-DRO). Sixteen discrete surface soil (0 to 1 or 1-2 ft bgs) samples were also collected and analyzed for PAHs. Subsequently, QORE Property Sciences (QORE), on behalf of Athens-Clarke County, collected 10 surface (< 2 ft bgs) and 13 subsurface (> 2 ft bgs) soil samples. All of the QORE soil samples were analyzed for Resource Conservation and Recovery Act (RCRA) metals and select samples were analyzed for pesticides, herbicides, volatile organic compounds (VOCs), and PAHs. One groundwater sample was collected and analyzed for RCRA metals, VOCs, and PAHs.

Carbon disulfide was detected in two samples in excess of the Georgia Hazardous Site Response Act (HSRA) Notification Concentration (NC), which for carbon disulfide is the detection limit. The carbon disulfide detections were 0.007 mg/kg and 0.016 mg/kg, respectively. Laboratory analytical data provided by QORE is attached. The soil samples were analyzed for volatile organic compounds (VOCs) utilizing Environmental Protection Agency (EPA) Method 5035 and 8260B. We believe that the detected carbon disulfide is either an artifact from the laboratory testing or naturally occurring as a result of anaerobic biodegradation of organic matter and not associated with a release of a regulated substance as defined under Chapter 391-3-19-.04 of the Georgia Hazardous Site Response Act (HSRA).

Drinking water for Athens-Clarke County is obtained from the North Oconee River, Middle Oconee River, and Bear Creek Reservoir. The Site is reportedly located within 1.5 miles of the surface water intake on the North Oconee River located adjacent to the J. G. Beacham Water Treatment Plant at 800 Waterworks Drive.

# RELEASE NOTIFICATION/REPORTING FORM



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

RECEIVED  
 Georgia EPD  
**APR 21 2009**  
 Hazardous Sites  
 Response Program

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

## PART I -- PROPERTY INFORMATION

(Please type or print legibly)

2	EPA ID NUMBER (if applicable)	GAD981025265			
3	Tax Map and Parcel ID Number:	C092-0003-001	Acreage	151	
4	Site or Facility Name	Trinity North American Freight Car			
5	Site Street Address	190 Old Grassdale Road			
6	Site City	Cartersville	County	Bartow	Zip 30121
7	Property Owner	Trinity North American Freight Car, Inc.			
8	Property Owner Mailing Address	2525 Stemmons			
9	Property Owner City	Dallas	State	Texas	Zip 75207
10	Property Owner Telephone No.	214.631.4420			
11	Site Contact Person	Robert Fair	Title	Plant Manager	
12	Site Contact Company Name	Trinity North American Freight Car, Inc.			
13	Site Contact Mailing Address	190 Old Grassdale Road			
14	Site Contact City	Cartersville	State	GA	Zip 30121
15	Site Contact Telephone No.	770.382.9400			
16	Facility Operator Contact Person	Robert Fair	Title	Plant Manager	
17	Facility Operator Company Name	Trinity North American Freight Car, Inc.			
18	Facility Operator Mailing Address	190 Old Grassdale Road			
19	Facility Operator City	Cartersville	State	Ga	Zip 30121
20	Facility Operator Telephone No.	770.382.9400			

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

Theis Rice  
 NAME (Please type or print)

Vice President/Chief Legal Officer

SIGNATURE

DATE

## PART II -- RELEASE INFORMATION

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

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

*Unknown; Although likely naturally occurring.*

**2. Release date(s) and any known information about the history of the release, including the physical state of the material (solid, powder/ash, liquid/gas, sludge) and the quantity of material released (lbs, cubic yards, etc.):**  
*Soil Testing indicated Arsenic concentrations above state screening levels. Testing was conducted in March 2009.*

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

*The Georgia Dept. of Transportation (DOT) through their consultant (United Consulting) conducted soil and groundwater testing in relation to an assessment and potential acquisition for Right of Way access. Approximately 4 soil borings and 3 monitor wells were installed on Trinity property as part of a larger scale assessment conducted on other properties. Analyses included VOCs, SVOCs and RCRA Metals for both soil and groundwater. Other than Arsenic in one soil sample no other constituents of concern were above their respective screening levels. Trinity also conducted soil testing in the same area as the DOT to confirm concentrations for quality control.*

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

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

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

*The entire Trinity property located at 190 Old Grassdale Road is enclosed with security fencing. The only access is through the main entrance which is manned with security 24 hrs/day.*

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

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

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

*The area of the site where testing was conducted is highly wooded with pine trees. The soils are native and include silts and clays. The arsenic concentration in the soil sample above screening was detected at a depth of 5-6 feet below surface in a native soil.*

## PART II -- RELEASE INFORMATION

(Continued)

Page 2 of 4

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

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

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

Name: Unknown at this time

Address: Based on aerial search

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

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

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

Name: Unknown at this time

Address: Most are on county provided water

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

Yes       No

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

## REQUIRED ATTACHMENTS

### 9. SITE SUMMARY

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

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Summary of Investigations  
Trinity North American Freight Car Plant Number 1493  
190 Old Grassdale Road  
Cartersville, GA

The Georgia Department of Transportation through their consultant United Consulting, Inc. conducted soil and groundwater testing at the Trinity North American Freight Car Plant (Trinity) which is located in Cartersville, GA. The Trinity property is located in an industrial area of Cartersville and comprises approximately 151 acres secured and enclosed by fence. The property consists of offices and large buildings utilized for the manufacturing of railroad cars and a large portion of the property is vacant and heavily wooded.

The purpose of the assessment by United Consulting, Inc. was to screen properties recognized as an environmental concern based on a Phase I study completed for a proposed Right of Way (ROW). The proposed ROW crosses a portion of the Trinity property at the North East corner, see attached map. The following summary was taken from United Consulting, Inc. report dated May 19, 2008.

*During the assessment, four direct push borings, DP-30, DP-31, DP-32 and DP-33 were advanced at the Trinity Rail Group facility to assess for potential impacts in the area of the proposed ROW acquisition. Groundwater was encountered in DP-30, DP-31 and DP-33. Groundwater was not encountered DP-32. Nine soil samples and three groundwater samples were submitted for analytical testing of VOCs, SVOCs and RCRA metals. Analytical testing did not indicate the presence of VOCs or SVOCs in the groundwater samples collected. One elevated RCRA metal was detected in the soil samples collected.*

*One of the RCRA metals soil detections, arsenic at a concentration of 50.2 mg/kg (DP-30 @5') was above HSRP NC 41 mg/kg.*

Based on only excerpts from United Consulting, Inc. report and no analytical reports to confirm QA/QC, Trinity conducted soil assessment in the same area of DP-30 tested previously. Trinity installed three borings as "step out" borings from DP-30. The borings were located approximately 10-15 feet from DP-30 in three directions.

The borings were installed utilizing a hand auger to a maximum depth of 6 feet. Soil samples were collected at selected predetermined depths to confirm results obtained by the previous investigation. Out of five (5) samples collected and analyzed for Arsenic, lab results indicated one soil sample collected from a depth of 5.5 feet had an Arsenic concentration above HSRP NC at 43 mg/kg. All other soil samples collected at different depths and at different locations around DP-30 were all well below HSRP screening levels.

In summary, based on all testing conducted in the past, analytical results for both soil and groundwater and that all testing was conducted in an area of the plant that is undeveloped and not associated with current manufacturing, Trinity believes that the Arsenic levels detected are indicative of background conditions and do not pose a threat to the environment.