

# DRAFT Cleanup Work Plan – Soil Remediation

Paul Avenue  
0 Paul Avenue NW, Atlanta, Fulton County, Georgia

May 6, 2020

Prepared for:  
City of Atlanta  
EPA Cooperative Agreement BF-95445109-4



## DRAFT Cleanup Work Plan - Soil Remediation

Prepared for: City of Atlanta  
68 Mitchell Street SW  
Atlanta, Georgia 30303  
EPA Cooperative Agreement BF-95445109-4



and

The Conservation Fund  
100 Peachtree Street, NW  
Suite 230  
Atlanta, Georgia 30303

The logo for The Conservation Fund consists of a dark blue rectangular background. The words "THE CONSERVATION FUND" are written in white, uppercase, sans-serif font. "THE" is smaller and positioned above "CONSERVATION".

Project Name: **DRAFT Cleanup Work Plan**  
Paul Avenue  
0 Paul Avenue NW  
Atlanta, Fulton County, Georgia

Submission Date: May 6, 2020

## Table of Contents

<b>1</b>	<b>Introduction</b>	<b>1</b>
<b>2</b>	<b>Background</b>	<b>2</b>
2.1	Site Description	2
2.2	Site History	2
2.3	Environmental Impact	2
<b>3</b>	<b>Previous Assessment Activities</b>	<b>3</b>
3.1	Compliance Status Report, MACTEC, August 2006	3
3.2	Prospective Purchaser Corrective Action Plan, ETRI, September 2019	4
<b>4</b>	<b>Cleanup Objectives / Applicable Regulations</b>	<b>8</b>
4.1	Cleanup Objectives	8
4.2	Cleanup Standards	8
4.3	Historic Preservation	8
4.4	Davis-Bacon Act	8
<b>5</b>	<b>Remediation Activities</b>	<b>9</b>
5.1	Design Phase Investigation	9
5.2	Soil Management	9
<b>6</b>	<b>Schedule and Phasing</b>	<b>11</b>
<b>7</b>	<b>References</b>	<b>12</b>

## Figures

Figure 1	USGS Topographic Map
Figure 2	Site Boundary Map
Figure 3	Tax Map
Figure 4	Sampling Location Map
Figure 4	Estimated Soil Excavation Area

## Appendices

Appendix A	ETRI PPCAP with EPD Comments
Appendix B	ETRI Design Phase Investigation of Work with Proposed Sampling Location Map

# 1 Introduction

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This Cleanup Work Plan has been prepared for the property located at 0 Paul Avenue NW, Atlanta, Fulton County, Georgia 30318 further referred to as the “Subject Site/Property” or “Site”. The Site consists of one parcel with approximately 0.2009 acres and the parcel ID # is 17 025300100717. The Subject Site is currently vacant and owned by The Conservation Fund (TFC). The Subject Site is located within the Northwest Atlanta, Georgia Topographic Quadrangle of the US Geological Survey (USGS) 7.5-minute series map as shown in **Figure 1**.

Multiple environmental investigations have occurred at the Site since 1995. The information obtained during these assessments was utilized to guide site activities with respect to potential environmental impairment and liabilities associated with the property due to contamination by hazardous substances, controlled substances, or petroleum products on or near the site.

The City of Atlanta was awarded a fiscal year (FY) 2009 Environmental Protection Agency (EPA) Brownfield Assessment and Cleanup Revolving Loan Fund (RLF) # BF-95445109, with multiple supplemental awards. This grant is funding the development of this and other documents associated with the management of contaminated soil throughout the Subject Site.

This Soil Remediation Work Plan has been prepared to document the management of contaminated soil in order to programmatically ready the site for cleanup and future redevelopment. Public notice will be given in accordance with the requirements of the RLF, and this document will be available for public review and comment prior to implementation. The soil remediation at the Subject Site will consist of the following:

- Excavation and removal of contaminated soil

The remediation work will be conducted in accordance with an EPA approved Quality Assurance Project Plan (QAPP). The QAPP outlines the participants involved, their roles in the cleanup, activities to be conducted, data quality objectives, sampling design, analytical sampling methodologies, and quality control/quality assurance (QA/QC) requirements. In addition to meeting EPA requirements for the QAPP, this document is also designed to meet the requirements for the management of contaminated soil as outlined by the Georgia Environmental Protection Division (EPD) Brownfield Cleanup Program approved corrective action plan documents.

## 2 Background

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### 2.1 Site Description

The Subject Site consists of one parcel totaling approximately 0.2009 acres that is classified in Fulton County records as “R3 – Residential Vacant.” The Subject Site is vacant, undeveloped, partially wooded land. A railroad borders the Subject Property to the northwest, and Paul Avenue to the southeast, with undeveloped land to the northeast and southwest. A Site Boundary Map is included as **Figure 2**. The Subject Property is listed on the Fulton County Tax Assessor as parcel ID #17 025300100717, and a Tax Map is included as **Figure 3**.

### 2.2 Site History

The Subject Site has been undeveloped since as early as the 1930s. Paul Avenue was developed to the adjoining southeast in the early 1940s, and the railroad to the adjoining northwest was developed in the 1960s. Surrounding property along Paul Avenue has been primarily residential as early as the 1940s. The Georgia Power Company (Georgia Power) owns the property to the adjoining northeast, northwest, and southwest; however, according to historical records and previous environmental reports, Georgia Power has only used this land as a power line easement, and has never operated on these properties.

### 2.3 Environmental Impact

In 1995, a complaint was issued to the Georgia Environmental Protection Division (EPD) Hazardous Waste Management Branch due to the presence of suspect fill material at the adjoining 2386 Paul Avenue property. It was suspected that this fill material originated from a nearby former Bernath Barrel and Drum facility. This fill material was sampled and investigated by the Georgia EPD, and metal impacts, including lead, arsenic, barium, and silver, were noted above Georgia EPD Notification Concentrations (NCs). Due to access restrictions, this fill material was not formally investigated until 2002 when it was determined to be located on three adjoining parcels (0 Paul Avenue - 17 025300100808; 2386 Paul Avenue – 17 025300100725; and 0 Paul Avenue – 17 025300100717 [Subject Site]).

This impacted soil was removed and properly disposed by Georgia Power to the satisfaction of the Georgia EPD in 2006; however, recent investigations conducted in 2018 by Environmental Technology Resources, Inc. (ETRI) on behalf of TCF identified lead impacts above the NCs on the Subject Site.

## 3 Previous Assessment Activities

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Numerous investigations, soil and groundwater investigations, a Georgia EPD corrective action plans and soil removal reports, and other assessment have been completed on the Subject Site since 1995.

This section goes into detail on various environmental cleanup standards and regulations. Specifically, the Georgia EPD Rules for Hazardous Site Response Act (HSRA) Risk Reduction Standards (RRS) apply. There are five types of RRS, including the following:

- Type 1 RRS – will pose no significant risk on the basis of **standardized exposure assumptions** and defined risk level for **residential** properties
- Type 2 RRS – will pose no significant risk on the basis of **site-specific risk assessment** exposure assumptions and defined risk level for **residential** properties
- Type 3 RRS - will pose no significant risk on the basis of **standardized exposure assumptions** and defined risk level for **non-residential** properties
- Type 4 RRS - will pose no significant risk on the basis of **site-specific risk assessment** and defined risk level for **non-residential** properties
- Type 5 RRS – are allowable only in instances where Type 1-4 RRS are not appropriate, and consist of the use of **engineered or institutional controls**.

Throughout this section and throughout this document, the residential standards (Types 1 and 2) are referenced as the standards to be followed during cleanup activities.

### 3.1 Compliance Status Report, MACTEC, August 2006

MACTEC Engineering and Consulting, Inc. (MACTEC) completed a Compliance Status Report (CSR) on behalf of Georgia Power in August 2006. The purpose of this report was to summarize heavy metal impacted soil removal activities conducted on the Subject Site and two adjoining properties to the southwest (0 Paul Avenue and 2386 Paul Avenue).

The report summarized the history of heavy metal impacts, noting that it originated from a 1995 complaint of suspect fill material associated with the former Bernath Barrel and Drum, Inc. facility at 2386 Paul Avenue. It should be noted that this complaint was for illegal dumping, and historical records and previous reports provide no indication that Bernath Barrel and Drum, Inc. ever operated on the Subject Site or surrounding properties. This complaint resulted in Georgia EPD collecting of four shallow soil samples which identified heavy metals (arsenic, barium, lead, and silver) above NCs. Due to access restrictions, these metal impacts were not further investigated until 2002.

In 2002, MACTEC under order by the Georgia EPD delineated the contamination to three parcels, which include the Subject Site (at the time owned by Ms. Buckman) and the two parcels to the adjoining southwest (0 Paul Avenue - 17 025300100808, owned by Georgia Power and 2386 Paul Avenue – 17 025300100725, owned by Mr. and Mrs. Hall). Georgia Power was included on the initial Georgia EPD Hazardous Site Inventory (HSI) listing, however it is noted in the CSR that Georgia Power never operated on the Subject Site and surrounding properties and did not contribute to the release. Georgia Power took responsibility of the corrective action, and were ordered by Georgia EPD in 2005 to cleanup the metal impacted soil on all parcels.

In July 2006, MACTEC completed soil removal operations at the Subject Site and adjoining southwest parcels. Soil was reportedly screened and soil above the Georgia EPD Type 1 (residential) Reduction Standard (RRS) were removed.

As part of their investigation, one groundwater sample was collected from one temporary monitoring well (TW-1) and analyzed for lead, arsenic, and chromium. None of the metals were identified above the laboratory detection limit. Based on the removal of impacted soil and no evidence of groundwater impacts, the Georgia EPD removed the site from the HSI.

An excerpt of this CSR is included as **Appendix A**.

### **3.2 Prospective Purchaser Corrective Action Plan, ETRI, September 2019**

ETRI completed a Prospective Purchaser Corrective Action Plan (PPCAP) on behalf of TCF in September 2019. The purpose of this report is to get the Subject Site into the Georgia EPD Brownfields Cleanup Program (BCP).

The report outlined sampling completed by ETRI in September 2018 to verify the previous soil removal activities by Georgia Power and MACTEC. ETRI advanced five soil borings (B1 through B5) utilizing a stainless steel hand auger, and soil samples were collected at 0-3 inches and at 1.5 feet bgs at each boring. Samples were analyzed for lead, and ETRI identified multiple samples with lead ranging from 12.7 milligrams per kilogram (mg/kg) to 2,320 mg/kg. Specifically, two samples (B1 @ 1.5' and B4 @ 1.5') of which were above the Georgia EPD Type 1 Residential RRS of 270 mg/kg.

Based on these findings, ETRI completed additional sampling in November 2018 to further delineate the lead impacts. ETRI advanced ten soil borings (B6 through B15) via direct push technology (DPT) each to a depth of 10 feet bgs. Soil samples were collected at 0-3 inches, 2 feet, and 4 feet bgs. Samples at 5 and 10 feet bgs were placed on hold pending analytical results, and only samples at B-14 were analyzed at that depth.

In summary, the November 2018 investigation identified two additional samples (B14 @ 2' and B15 @ 2') with concentrations of lead above the Georgia EPD Type 1 RRS.

In total, four borings contained lead concentrations above regulatory standards, and are the following:

- B1 @ 1.5' bgs – 2,320 mg/kg
- B4 @ 1.5' bgs – 728 mg/kg
- B14 @ 2' bgs – 287 mg/kg
- B15 @ 2' bgs – 1,180 mg/kg

No other samples contained lead concentrations above the RRS or NCs. Based on the findings of the initial and additional ETRI investigation, the PPCAP was submitted to the Georgia EPD BCP in September 2019. The ETRI sampling map is included as **Figure 4**.

On September 30, 2020, Georgia EPD has requested revisions to the PPCAP, which include the following provisions:

- Sampling of additional metals of concern besides lead, including arsenic, barium, chromium, and silver;
- Groundwater sampling to indicate baseline conditions and to obtain groundwater flow direction; and
- General updates to the PPCAP figures, text, and tables.

These revisions are currently being evaluated by TCF and ETRI, and will be addressed prior to the implementation of cleanup activities. The Subject Site was provided a provisional limitation of liability by the BCP in October 2, 2019.

An excerpt of this PPCAP and subsequent comments from EPD is included in **Appendix A**.



## 4 Cleanup Objectives / Applicable Regulations

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### 4.1 Cleanup Objectives

The first and foremost cleanup objective is the protection of human health and the environment. This objective will be completed by removing the impacted soils located throughout the site to below the residential Type 1 RRS, or to limit direct access to contaminated soil through the use of cap, cover, or fencing. The Subject Site end use is anticipated to be greenspace or a public park.

Additionally, the Georgia Brownfield Program affords a prospective purchaser liability protection for groundwater impacts. While no dissolved groundwater impacts have been identified at the Subject Site in previous assessment, if encountered they will not be the direct responsibility of the prospective purchaser.

### 4.2 Cleanup Standards

Corrective action remedial concentrations for soil are regulated under Chapter 391-3-19 of the GA EPD HSRA criteria. Based on the anticipated end use as a public park, Type 1 residential RRS are proposed.

### 4.3 Historic Preservation

No historic structures or features are noted on the Subject Site. In order to verify no historic structure or features will be impacted, the City of Atlanta has submitted a Section 106 National Historic Preservation Act (NHPA) form to the Georgia Historic Preservation Division (HPD) for their review and determination. A response from HPD is still pending.

### 4.4 Davis-Bacon Act

All soil remediation work funded by the City of Atlanta's EPA Brownfields RLF grant funds must comply with the US Department of Labor (DOL) Davis-Bacon Act (DBA), which requires payment of prevailing wage rates for cleanup activities. The budget and schedule will take this into account. More details regarding the Davis-Bacon Act can be found on the DOL's website:

<https://www.dol.gov/whd/regs/compliance/whdfs66.pdf>.

Cardno, as the Qualified Environmental Professional (QEP) for the City of Atlanta under their EPA RLF grant, will be responsible for overseeing Davis-Bacon Act requirements on behalf of the City of Atlanta.

## 5 Remediation Activities

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The impacted soil will be managed by completing the actions specified for each area. This work plan incorporates the remediation requirements in accordance with the applicable Federal, State, and local regulations.

### 5.1 Design Phase Investigation

In response to the Georgia EPD comments and to further delineate the lead impacts, a Design Phase Investigation is anticipated to be completed by ETRI on behalf of TCF prior to implementation of cleanup. This Design Phase Investigation will include the following:

- Property boundary survey to accurately identify property boundaries and define the limits of investigation
- Install six additional soil borings on the property for 8 RCRA metals to delineate the limits of soil impacts. Samples to be collected between 0-2 feet bgs.
  - Four of the borings are to be located on the north-northwest side of the property
  - One boring adjacent boring B1 and to be analyzed for toxicity characteristic leachate procedure (TCLP) 8 RCRA metals for waste characterization purposes
  - One boring is to be located on the south-southeast side of the property
- Three of the soil borings are to be converted to temporary monitoring wells, with an anticipated groundwater depth between 5-25 feet below ground surface (bgs).
  - Two temporary wells on the northwest portion, and one on the southeast portion
  - Temporary wells will be purged a minimum of three well volumes, and a sample collected for total and dissolved 8 RCRA metals
  - Determine top of casing elevation of the temporary wells to determine groundwater flow direction
- Pending the results of the TCLP sample, a waste profile will be developed and submit the profile for possible disposal in a Subtitle D Landfill.

This Design Phase Investigation will be conducted in accordance with an EPA approved QAPP. Specific sampling and analytical requirements, QA/QC measures, and assessment activities are further discussed in the QAPP. Proposed sampling locations provided by ETRI are included as **Appendix B**.

### 5.2 Soil Management

Currently the area with lead impacts are identified in four borings between 1.5 – 2 feet bgs located in the northwest and southeast portions of the site. Until further delineation occurs, the limits of impact are confined to the property boundary and to the sample locations with no evidence of impacts.

For the purposes of this Cleanup Work Plan, the worst case scenario is anticipated, and upon further delineation, if necessary, this Cleanup Work Plan will be revised to provide adequate cleanup numbers. However, the overall cleanup strategy, soil management, and disposal will remain the same.

Currently the Subject Site is estimated to require excavation from approximately 3,750 square feet (SF) to a depth between 0-3 feet bgs. Specifically, one approximately 500 SF area of soil on the east portion at the location of B1 to a depth of two feet bgs, and another approximately 3,250 SF area of soil on the northwest portion at the locations of B4, B14, and B15 to a depth of three feet bgs. A map depicting the estimated soil excavation area is depicted on **Figure 5**.

The total volume of soil to be removed is approximately 420 cubic yards (CY) or 630 tons. This soil is to be excavated and stockpiled on site, and backfilled with clean soil. The impacted soil must be packaged in Georgia Department of Transportation (GDOT) approved containers, transported by licensed haulers, and disposed of at an approved landfill.

Confirmation sampling to verify the adequate removal of impacted will will be collected in accordance with the Georgia EPD PPCAP and the EPD *Guidance for Demonstrating Completion of Soil Removal Actions at Corrective Action Sites in Georgia*, 2017. Specifically, confirmation soil samples are anticipated to be collected every 25 linear feet along the side walls of the excavation at the depth of identified impact with a minimum of four per excavation. One confirmation soil sample will be collected for every 625 square feet of the excavation floor. Soil confirmation samples will only be collected on the Subject Site, and therefore no sidewall samples will be collected at the property boundary.

## 6 Schedule and Phasing

It is anticipated that all work will be started in late Summer 2020, with completion by the end of Fall 2020.

Cardno was provided a tentative schedule for the remediation activities from TCF and their selected contractors. Design Phase Investigation activities will start upon approved QAPP and subgrant award, and is anticipated to take approximately 30 days. Field work is anticipated to take five business days.

Below is a summary of the project milestones schedule and anticipated cleanup work.

### Project Milestones and Proposed Work Schedule

Milestone	Date
Public Engagement Meeting – Neighborhood Planning Unit (NPU) D	April 28, 2020
Public Comment Period	April 28 – May 27, 2020
Draft ABCA, Cleanup Work Plan, and QAPP	May 6, 2020
Public Engagement Meeting – Cleanup Specific	May 12, 2020
ABCA Approved	May 29, 2020
Cleanup Work Plan Approved	May 29, 2020
QAPP Approved	June 5, 2020
Subgrant Approval	June 18, 2020
Design Phase Investigation	June 22 – July 17, 2020
Soil Remediation	July 20 – July 24, 2020
Georgia EPD Brownfield Compliance Status Report (CSR)	July 27 – September 28, 2020
Closeout Reporting	September 29 – October 20, 2020

Please note that the soil remediation schedule may change depending on the findings of the Design Phase Investigation, and that the schedule is dependent field conditions and on guidance from federal, state, and local officials on Covid-19 regarding work or travel protocols.

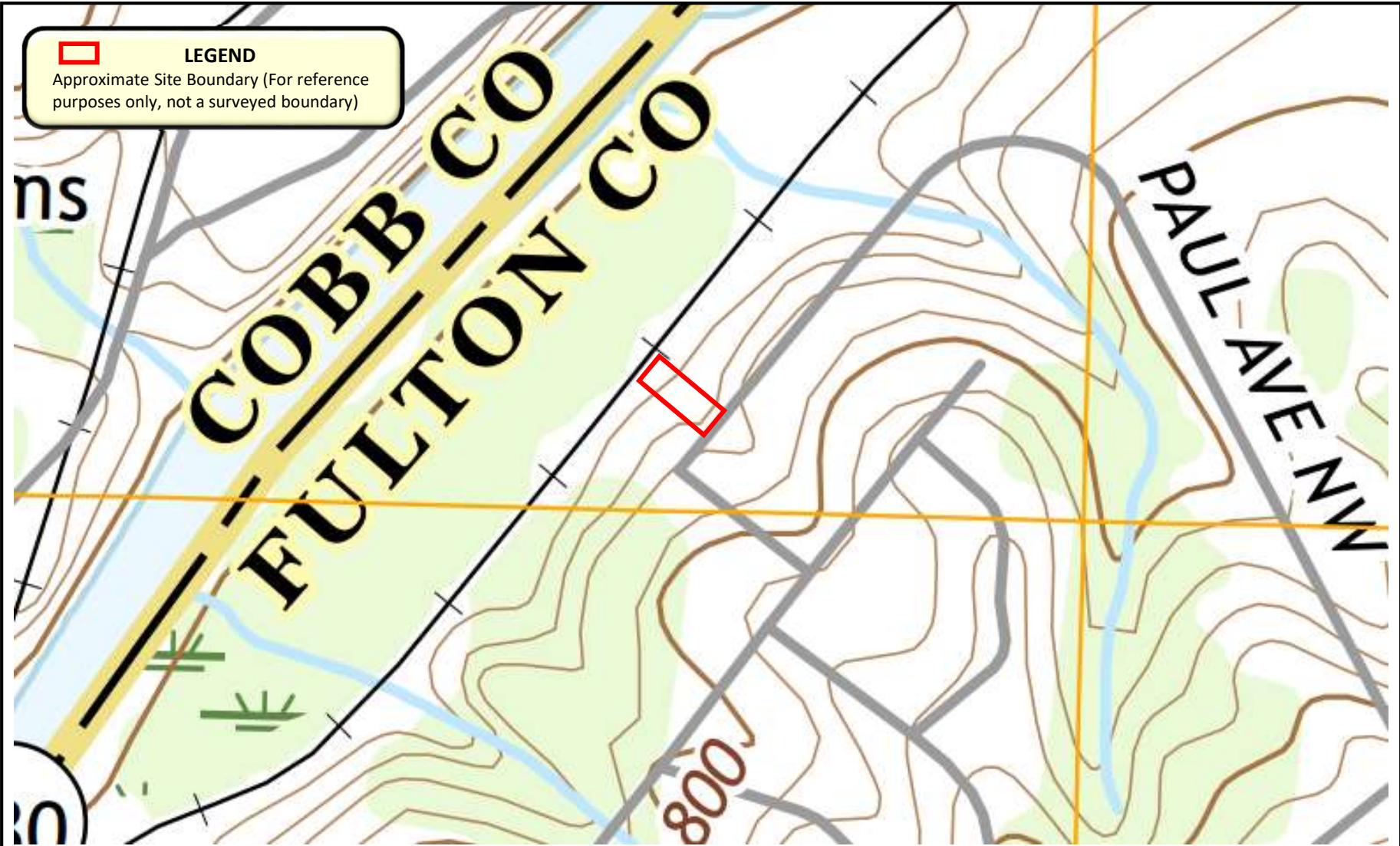
## 7 References


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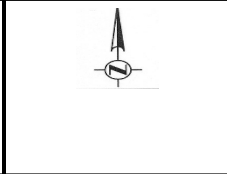
- *Compliance Status Report* – Paul Avenue Site, 2386 Paul Avenue, Atlanta, GA, dated August 28, 2006, MACTEC
- *Prospective Purchaser Corrective Action Plan* – 0 Paul Avenue, Atlanta, GA, dated September 9, 2019, ETRI
- Fulton County Board of Tax Assessors GIS,  
<https://iaspublicaccess.fultoncountyga.gov/maps/mapadv.aspx>

# Figures

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 **LEGEND**  
Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



Cleanup Work Plan  
0 Paul Avenue  
Fulton County, Atlanta, GA  
Cardno Project: 0002421001

**Figure 1**  
**USGS/Site Vicinity Map**  
Source: USGS 2017



**LEGEND**

Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



*"This is not a map of survey."*



Cleanup Work Plan  
0 Paul Avenue  
Fulton County, Atlanta, GA  
Cardno Project: 0002421001

**Figure 2**  
**Site Boundary Map**  
Source: GoogleEarth





**LEGEND**

Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



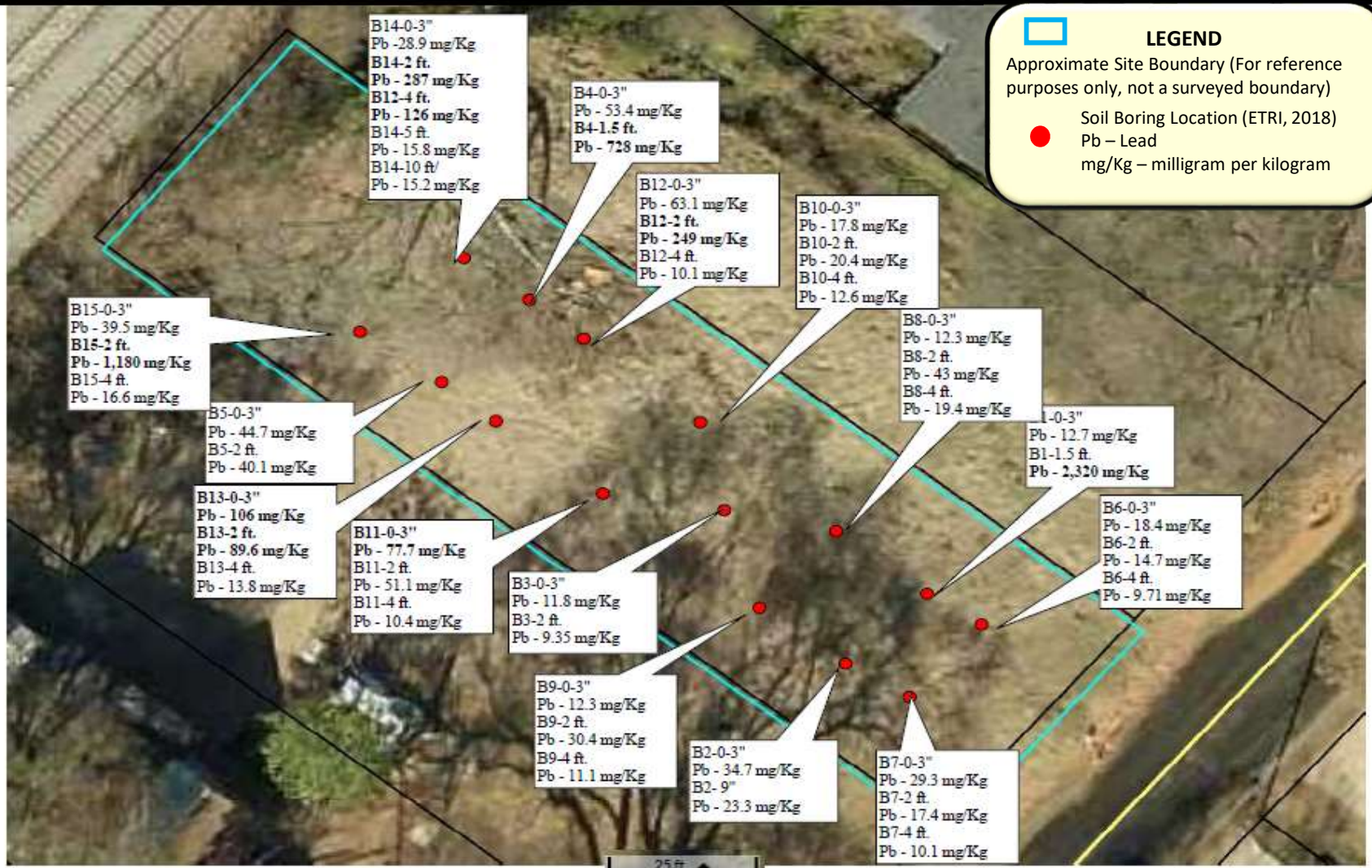
*"This is not a map of survey."*



Cleanup Work Plan  
0 Paul Avenue  
Fulton County, Atlanta, GA  
Cardno Project: 0002421001

**Figure 3**  
**Tax Map**

Source: Fulton County GIS



"This is not a map of survey."



Cleanup Work Plan  
 0 Paul Avenue  
 Fulton County, Atlanta, GA  
 Cardno Project: 0002421001

**Figure 5**  
**Soil Sampling Location**  
 Source: ETRI PPCAP, September 2019



"This is not a map of survey."



Cleanup Work Plan  
 0 Paul Avenue  
 Fulton County, Atlanta, GA  
 Cardno Project: 0002421001

**Figure 4**  
**Estimated Soil Excavation Area**  
 Source: GoogleEarth

# Appendix A

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## ETRI PPCAP with EPD Comments

**PROSPECTIVE PURCHASER  
CORRECTIVE ACTION PLAN**

**0 Paul Avenue, NW  
Atlanta, Fulton County, Georgia**

Submitted To:

**Georgia Department of Natural Resources**

Environmental Protection Division  
Brownfield Program  
2 Martin Luther King Jr. Drive  
Floyd Towers East, Suite 1054  
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Prepared By:

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Atlanta, Georgia 30338  
Telephone # (770) 888-8181

September 9, 2019

**PROSPECTIVE PURCHASER CORRECTIVE ACTION PLAN**  
**0 Paul Avenue, NW**  
**Atlanta, Fulton County, Georgia**

**TABLE OF CONTENTS**

<u>Section</u>	<u>Page</u>
1.0 INTRODUCTION .....	2
1.1 General .....	2
1.2 Prospective Purchaser Information .....	3
1.3 Site History .....	3
1.4 Previous Environmental Investigations.....	4
2.0 INVESTIGATIONS COMPLETED FOR THE PROSPECTIVE PURCHASER .....	6
3.0 QUALIFICATION OF SITE AND PROSPECTIVE PURCHASER .....	8
4.0 CORRECTIVE ACTION PLAN .....	9
4.1 Summary of Soil Conditions.....	9
4.2 Corrective Action Completed or In Progress.....	9
4.3 Corrective Action Approach and Selected Technologies.....	9
4.3.1 Effectiveness.....	10
4.3.2 Other Regulatory or Permitting Requirements .....	10
4.4 Schedule .....	11
5.0 PREPARATION OF CSR .....	12
6.0 CERTIFICATION STATEMENT.....	13

**List of Figures**

- Figure 1 – Site Location Map
- Figure 2 – Tax Map
- Figure 3 – Site Plan
- Figure 4 – Soil Removal Plan and Monitoring Well Location
- Figure 5 – Soil Boring Location Map and Results

**List of Appendices**

- Appendix A – Legal Description
- Appendix B – Georgia EPD De-Listing Letter
- Appendix C – Laboratory Analytical Reports
- Appendix D – Georgia EPD – Prospective Purchaser and Property Qualifying Criteria Form

**PROSPECTIVE PURCHASER CORRECTIVE ACTION PLAN**  
**0 Paul Avenue, NW**  
**Atlanta, Fulton County, Georgia**

**1.0 INTRODUCTION**

1.1 GENERAL

This Prospective Purchaser Corrective Action Plan (PPCAP) has been prepared for The Conservation Fund (TCF) for the property located at 0 Paul Avenue, NW in Atlanta, Fulton County, Georgia (“subject property” or “Site”). The subject property is located in Land Lot 253 of the 17<sup>th</sup> Land District of Fulton County, Georgia. The property is located on the northwest side of Paul Avenue, NW. A Norfolk Southern rail line forms the northwestern boundary of the property. A Site Location Map depicting the location of the subject property and its surrounding topography is included as **Figure 1**.

The approximate latitude and longitude coordinates of the property are 33° 49’ 12.29” north and -84° 28’ 29.88” west, respectively. The site is located within the Northwest Atlanta, Georgia Topographic Quadrangle, (United States Geologic Survey, 7.5-minute series topographic quadrangle map dated 1997).

The subject property is an undeveloped, approximate 0.2009-acre tract of land and is identified by Fulton County Tax Assessor’s as Parcel No. 17 025300100717. According to the Fulton County Tax Map, the subject property is a rectangular shaped tract of land with 50 feet of frontage along Paul Avenue. The northeastern and southwestern sides of the property are approximately 175 feet. The northwestern side of the property is approximately 50 feet. The approximate boundaries of the property are shown in the Tax Map, **Figure 2**. A copy of the legal description of the property is included in **Appendix A**.

The subject property is currently mostly cleared and undeveloped tract of land. The property has not specific use at this time. A Site Plan is included as **Figure 3** which shows features of the subject and surrounding properties.

The current owner of the property is:

Sean O’Keefe for Equity Trust Company, Custodian FBO #029776

## 1.2 PROSPECTIVE PURCHASER INFORMATION

The Prospective Purchaser of the subject property is:

The Conservation Fund  
100 Peachtree Street, NW  
Suite 230  
Atlanta, Georgia 30303

The contact person for The Conservation Fund is:  
Mr. Stacy Funderburke  
Assistant Regional Counsel & Conservation Acquisition Associate  
(404) 221-0405

The Conservation Fund is acquiring the property for the City of Atlanta for inclusion in a future City of Atlanta Park on Paul Avenue.

## 1.3 SITE HISTORY

The history of the subject property was determined by reviewing aerial photographs, topographic maps, tax assessor records and City directories. The subject property was cleared and undeveloped land in 1938. By 1943, Paul Avenue had been constructed and formed the southeastern boundary of the Site. By the late 1960's, a rail line had been constructed which bordered the property to the northwest. The subject property has remained undeveloped land since at least the late 1930's. Surrounding property use was primarily farmland in the late 1930's. Dwellings were constructed along Paul Avenue when it was constructed in the early 1940's. The Georgia Power - Atkinson Plant, which is located north of the adjacent rail line and on the west side of the Chattahoochee River dates back to at least the 1940's. Expansion of the power plant continued through the early 1970's. A cement plant, currently operated at Argos Cement, was constructed at 2520 Paul Avenue, NW to the northeast in the late 1960's. The locations of the Paul Avenue properties, Plant Atkinson and cement plant are shown in Figure 3.

According to information obtained from a Compliance Status Report, suspected fill material which originated from the former Bernath Barrel & Drum facility (1835 Dickerson Drive, Mableton, Georgia) was deposited on the subject property and two adjoining two tracts of land. Georgia Power property - Paul Avenue, NW and 2386 Paul Avenue, NW). Sampling of the fill material in 1995 determined that it contained elevated concentrations of Arsenic, Barium Silver and Lead.



## 1.4 PREVIOUS ENVIRONMENTAL INVESTIGATIONS

In October 1995, the Georgia EPD collected four soil samples from suspected fill materials at the 2386 Paul Avenue property in response to a complaint made to the Hazardous Waste Management Branch concerning the placement of suspected fill materials from the former Bernath Barrel & Drum facility. Metals including Arsenic, Barium, Lead and Silver were found in the fill material above notification concentrations. It is not known if other parameters were tested during the initial investigations to identify the contaminants of concern.

In 1996, the Georgia EPD Hazardous Site Response Program assigned a State contractor the task of delineating the extent of metals contamination. The contractor was not given access to the property and the additional investigations were not performed.

In 2002, additional investigations were conducted by Harding ESE (a State contractor) and fill material was found on three parcels of land owned by Mr. & Ms. Hall, Georgia Power and Ms. Buckman (subject property). Georgia Power was notified of the fill material on their property in 2004 and that their parcel was part of the initial Hazardous Site Inventory listing. As a result, the Georgia Power parcel became part of the Paul Avenue site (HSI No. 10416). The Georgia Power parcel is located adjacent to and southwest of the subject property (see Figure 3).

Although Georgia Power never operated on the property and did not place any material on the property, they agreed to take responsibility for corrective actions. Administrative Order EPD-HSR-446 was issued to Georgia Power on October 11, 2005 which ordered Georgia Power to implement removal actions on their parcel. EPD would manage the removal actions and take any actions reasonably necessary to perform the work. The EPD also requested that Georgia Power submit a Compliance Status Report certifying that both soil and groundwater conditions meet applicable residential risk reduction standards.

In July 2006, Georgia Power completed soil removal activities under the direction of the Georgia EPD. A Soil Removal Report dated July 3, 2006 was prepared and submitted to the Georgia EPD. **Figure 4** shows the limits of the excavation on the subject property, adjoining Georgia Power Company parcel and 2386 Paul Avenue property.

Georgia Power also installed a temporary monitoring well on their property. A sample collected from the temporary well determined that Arsenic, Chromium and Lead were not detected above the laboratory's method detection limits.

After completing the soil removal activities, Georgia Power certified that the soils on their property, 2386 Paul Avenue and the subject property met Type 2 (Residential) Risk Reduction Standards. A Compliance Status Report (CSR) was prepared for Georgia Power and dated August 28, 2006. The CSR was prepared by MACTEC Engineering and Consulting, Inc. for Georgia Power. On September 28, 2006, the Georgia EPD de-listed the Paul Avenue site (HSI # 10416) from the Hazardous Site Inventory. A copy of the de-listing letter is included in **Appendix B**.

## 2.0 INVESTIGATIONS COMPLETED FOR THE PROSPECTIVE PURCHASER

In 2018, The Conservation Fund entered into a purchase contract for the subject property. Given the historical environmental conditions of the subject and adjoining properties, ETRI recommended collecting and analyzing soil samples from the subject property. Lead was used as a target contaminant of concern for these investigations.

On September 19, 2018, soil samples were collected using a stainless steel hand auger from five soil borings. Soil samples were collected at depths of 0-3 inches and two feet to determine lead concentrations in soils on the subject property. **Table 1** summarizes the results of the sample analyses. The soil boring locations are shown in **Figure 5**.

**Table 1**  
**Summary of Soil Sample Analyses – September 19, 2018**  
0 Paul Avenue, NW, Atlanta, Georgia

<b>Parameter</b>	<b>B1-0-3"</b>	<b>B1-1.5'</b>	<b>B2-0-3"</b>	<b>B2-9"</b>	<b>B3-0-3"</b>
Lead	12.7 mg/Kg	2,320 mg/Kg	34.7 mg/Kg	23.3 mg/Kg	11.8 mg/Kg
	<b>B3-2'</b>	<b>B4-0-3"</b>	<b>B4-1.5'</b>	<b>B5-0-3"</b>	<b>B5-2'</b>
Lead	9.35 mg/Kg	53.4 mg/Kg	728 mg/Kg	44.7 mg/Kg	40.1 mg/Kg

Soil samples collected at depths of 0-3 inches were found to contain total Lead at concentrations up to 2,320 mg/Kg. Soil samples collected at 1.5 feet to two feet were found to contain total Lead at concentrations of up to 728 mg/Kg.

Additional investigations were conducted to further define the extent of soil contamination. On November 19, 2018, ETRI and its subcontractor, GeoLab Drilling mobilized to the site to install the soil borings. Ten additional three soil borings were installed on the property. The soil borings were installed using Geoprobe® direct push technology (DPT) drill rig. The soil borings were advanced to depths of ten feet. Soil samples were collected at 0-3 inches, 2 feet and 4 feet. Additional samples were also collected at depths of 5 feet and 10 feet and were only analyzed if the 4 ft. sample had elevated concentrations of Lead. The 5 ft. and 10 ft. samples were analyzed in boring B14.

The results of the analyses of the soil samples are summarized in **Table 2** and are shown in **Figure 5**. The analytical report is included in **Appendix C**.

**Table 2**  
**Summary of Soil Sample Analyses – November 19, 2018**  
 0 Paul Avenue, NW, Atlanta, Georgia

<b>Parameter</b>	<b>B6-0-3"</b>	<b>B6-2'</b>	<b>B6-4'</b>	<b>B7-0-3"</b>	<b>B7-2'</b>
Lead	18.4 mg/Kg	14.7 mg/Kg	9.71 mg/Kg	29.3 mg/Kg	17.4 mg/Kg
	<b>B7-4'</b>	<b>B8-0-3"</b>	<b>B8-2'</b>	<b>B8-4'</b>	<b>B9-0-3"</b>
Lead	10.1 mg/Kg	12.3 mg/Kg	43.0 mg/Kg	19.4 mg/Kg	12.3 mg/Kg
	<b>B9-2'</b>	<b>B9-4'</b>	<b>B10-0-3"</b>	<b>B10-2'</b>	<b>B10-4'</b>
Lead	30.4 mg/Kg	11.1 mg/Kg	17.8 mg/Kg	20.4 mg/Kg	12.6 mg/Kg
	<b>B11-0-3"</b>	<b>B11-2'</b>	<b>B11-4'</b>	<b>B12-0-3"</b>	<b>B12-2'</b>
Lead	77.7 mg/Kg	51.1 mg/Kg	10.4 mg/Kg	63.1 mg/Kg	249 mg/Kg
	<b>B12-4'</b>	<b>B13-0-3"</b>	<b>B13-2'</b>	<b>B13-4'</b>	<b>B14-0-3"</b>
Lead	10.1 mg/Kg	106 mg/Kg	89.6 mg/Kg	13.8 mg/Kg	28.9 mg/Kg
	<b>B14-2'</b>	<b>B14-4'</b>	<b>B14-5'</b>	<b>B14-10'</b>	<b>B15-0-3"</b>
Lead	287 mg/Kg	126 mg/Kg	15.8 mg/Kg	15.2 mg/Kg	39.5 mg/Kg
	<b>B15-2'</b>	<b>B15-4'</b>			
Lead	15.2 mg/Kg	16.6 mg/Kg			

Notes:  
 Results in mg/Kg, ppm

### 3.0 QUALIFICATION OF SITE AND PROSPECTIVE PURCHASER

The Hazardous Site Reuse and Redevelopment Act has set forth certain criteria in order to qualify for the Brownfield's Limitation of Liability. Based on our understanding of the site, we conclude that both the property and The Conservation Fund meet the Act's requirements as summarized below.

#### Subject Property

1. Has had a pre-existing release;
2. Does not have liens filed under subsection (e) of Code Section 12-8-96 against it;
3. Is not listed on the Federal National Priority List
4. Is not undergoing response activity by an order of the Environmental Protection Agency;
5. Is not a hazardous waste facility as defined in Code Section 12-8-62.

#### The Conservation Fund

1. Is not a current or former subsidiary, division, parent company or partner of any prior owners of the property;
2. Is not the former employer or current employer, nor otherwise affiliated with the current owners of the subject property or any person who has contributed or is contributing to a release on the property;
3. Has not found evidence of liens filed under subsection (e) of Code Section 12-8-96 against the property;
4. Is not in violation of any order, judgment, statute, rule or regulation subject to the enforcement authority of the director.

## 4.0 CORRECTIVE ACTION PLAN

### 4.1 SUMMARY OF SOIL AND GROUNDWATER CONDITIONS

The suspected source of heavy metals in soil on the subject property is believed to be from fill that was placed on the property and an unknown time. Additional soil investigations will be completed to define the depth and extent of Lead contamination that exists on the property.

Previous groundwater investigations included the installation of a monitoring well on the northwest side of the Georgia Power property. The depth to groundwater was determined to be approximately 18 feet below ground surface. The presumed groundwater flow direction is to the northwest and towards the Chattahoochee River. Groundwater sample analyses determined that none of the contaminants of concern were detected above laboratory detection limits.

A temporary groundwater monitoring well will be installed on the northwest side of the subject property at that completion of the soil removal. After properly purging the well, a groundwater sample will be collected and analyzed for total and dissolved RCRA Metals. The results of the groundwater sample analyses will be included in the PPCSR for the project.

### 4.2 CORRECTIVE ACTION COMPLETED OR IN PROGRESS

Georgia Power completed soil removal activities on the subject and two adjoining properties (2386 Paul Avenue and Georgia Power – Paul Avenue) in 2006. The CSR that was submitted to the Georgia EPD provided a figure outlining the areas of soil removal but did not provide soil quantities removed. Figure 4 shows the areas of soil removal on the three properties.

### 4.3 CORRECTIVE ACTION APPROACH AND SELECTED TECHNOLOGIES

Based on the investigations that have been completed, soils contaminated with the Lead have been identified on the property. These soils do not meet Type 1 or Type 2 Risk Reduction Standards for Lead. As noted, Lead was used as a Target contaminant of concern during investigations conducted on behalf of the prospective purchaser. During corrective actions, samples will also be analyzed for the presence of

Arsenic, Barium, Chromium Lead and Silver.

The soil investigations have defined the vertical and horizontal extent of Lead contamination in soil. The soils that have concentrations of Arsenic, Barium, Chromium, Lead and Silver above Type 1 or 2 Risk Reduction Standards will be remediated using excavation and off-site disposal.

The excavation, handling, transportation and disposal of the Lead contaminated soils will be performed in a manner to prevent contamination of the surrounding, un-impacted areas and in accordance with applicable federal, State and local laws. Any soils containing contaminants of concern (COC's) which require off-site disposal will be placed on a liner or barrier before placement on the ground or pavement. The excavated contaminated soil will be transported in compliance with all applicable regulations for transporting such waste and disposal at a pre-approved disposal facility permitted to accept the designated waste.

All work will be performed in accordance with applicable regulations, and in accordance with a site specific Health and Safety Plan and OSHA Standards.

#### 4.3.1 Effectiveness

If any soil removal or treatment is required, confirmation soil sampling will be conducted to determine the effectiveness of the removal or treatment activities. Confirmation samples will be collected every 25 feet along side walls of the excavation with a minimum of four per excavation. One confirmation soil sample will be collected for every 625 square feet of the excavation floor. The confirmation soil samples will be analyzed for contaminants of concern.

#### 4.3.2 Other Regulatory or Permitting Requirements

If required, transporters and facilities licensed to handle the waste will be utilized during the removal project.

The prospective purchaser will work with the Georgia EPD, prior to collecting any additional samples, to determine the specific locations and number of samples to be collected for additional assessment.

#### 4.4 SCHEDULE

The soil removal activities will be implemented within twelve (12) months of acquisition of the property. The prospective purchaser compliance status report will be submitted to the Georgia EPD on or prior to December 31, 2020.




## 5.0 PREPARATION OF CSR

An environmental consultant will prepare a Prospective Purchaser Compliance Status Report (PPCSR) on behalf of The Conservation Fund. The written report will consist of information in the format required for submission to the Georgia EPD. The PPCSR will include the following:

- A legal description of the property which comprises the Brownfield site,
- A description of each known source of release,
- A summary of all pertinent field and laboratory data,
- Definition of the horizontal and vertical extent of on-site soil contamination above HSRA notification concentrations,
- A baseline of groundwater conditions will be established,
- A description of geologic and hydrogeologic conditions at the site,
- Analytical results with chain of custody,
- A legal description and, if available, a survey plat,
- A description of the corrective actions used to bring the property into compliance with the RRS,
- A description of existing or potential human or environmental receptors and risk reduction standards,
- A summary of previous actions taken to eliminate, control, or minimize the potential risk at the site,
- An evaluation of the vapor intrusion pathway will be evaluated and addressed as necessary,
- Documentation of the proper characterization, transportation, and disposal of contaminated soils and/or hazardous wastes, if any, and,
- A concise statement of findings or the report including The Conservation Fund compliance with the appropriate soil risk reduction standards.
- Signature and seal of a Georgia Registered Professional Geologist and/or Professional Engineer.

## 6.0 CERTIFICATION STATEMENT

I certify that this report and all attachments were prepared under my direction in accordance with a system designed to assure that qualified personnel properly evaluated the information submitted. Based on my inquiry of the person or persons who prepared the information, the information submitted is, to the best of my knowledge, belief, true, accurate, and complete.



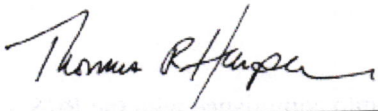
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Mr. Stacy Funderburke  
The Conservation Fund

8/26/19

---

Date



---

Thomas R. Harper, Technical Director  
Environmental Technology Resources, Inc.


July 12, 2019

---

Date

## 6.0 CERTIFICATION STATEMENT

I certify that this report and all attachments were prepared under my direction in accordance with a system designed to assure that qualified personnel properly evaluated the information submitted. Based on my inquiry of the person or persons who prepared the information, the information submitted is, to the best of my knowledge, belief, true, accurate, and complete.

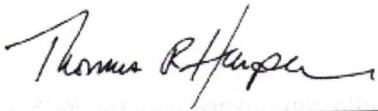


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Mr. Stacy Funderburke  
The Conservation Fund

8/26/19

Date



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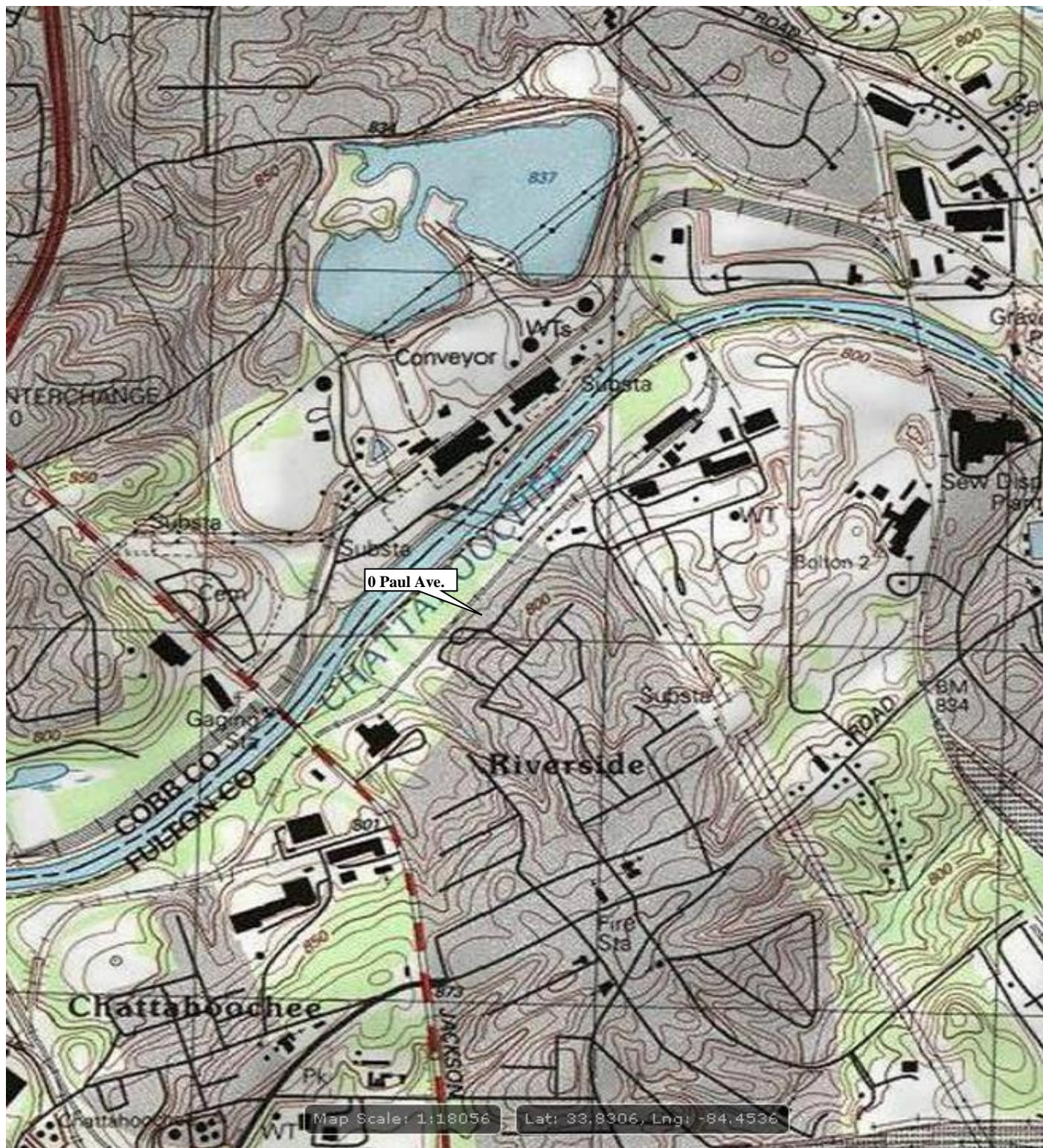
Thomas R. Harper, Technical Director  
Environmental Technology Resources, Inc.

July 12, 2019

Date

*Figures*

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Source: U.S. Geologic Survey

**ETRI**

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

**FIGURE 1  
SITE LOCATION MAP**

0 Paul Ave. NW  
Atlanta, Georgia

Project Number 18-054



Source: Fulton County Tax Assessor

**ETRI**

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

**FIGURE 2**

**TAX MAP**

0 Paul Ave. NW  
Atlanta, Georgia

Project Number 18-054



**ETRI**

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

Source: Fulton County Tax Assessor

Project No.  
 18-054

Scale  
 Noted

Date  
 2018

**FIGURE 3  
 SITE PLAN**

0 Paul Avenue, NW  
 Atlanta, Georgia



LEGEND	
TW-1	TEMPORARY WELL LOCATION
---	PROPERTY BOUNDARY
▨	SOIL EXCAVATION AREAS



<b>MACTEC</b> MACTEC ENGINEERING AND CONSULTING, INC. 396 PLAYERS AVENUE, N.E. ATLANTA, GEORGIA 30329 (404)873-4761	GEORGIA POWER COMPANY PAUL AVENUE SITE HSI 10416			MONITORING WELL LOCATION PLAN		
	Job Number: 6306-06-2060	Date: 01	Issue: AUG. 2006	Scale: AS SHOWN	Drawn by: RBT	Checked by: LJA

**ETRI**

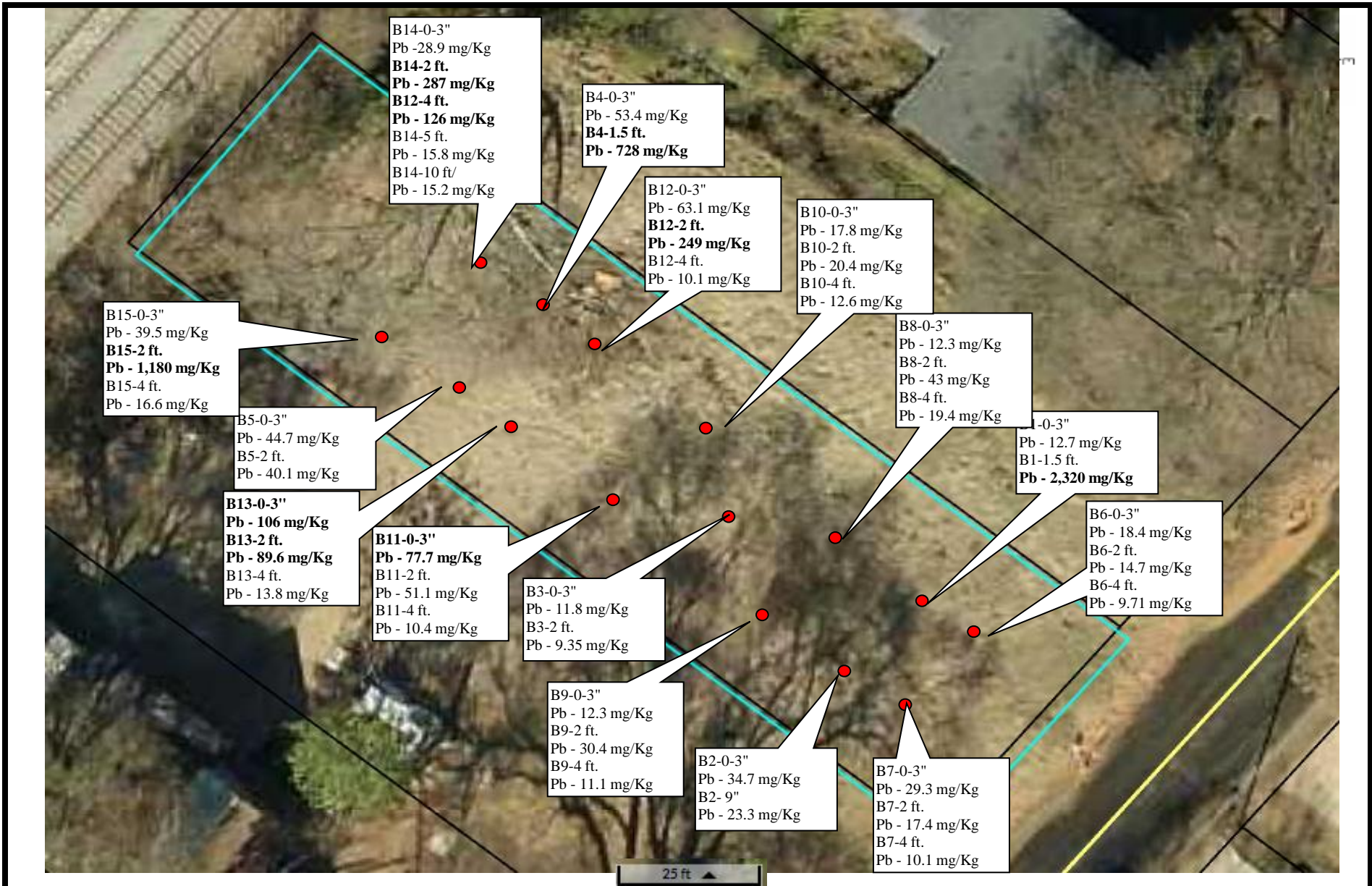
Environmental Technology Resources, Inc.  
 4780 Ashford Dunwoody Rd.  
 Suite A-456  
 Atlanta, Georgia 30338

Source: Mactec Engineering and Consulting

Project No.	Scale	Date
18-054	Noted	8/1/2006

**FIGURE 4**  
**SOIL REMOVAL PLAN AND MONTORNIG**  
**WELL LOCATION**  
 0 Paul Avenue, NW  
 Atlanta, Georgi a





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

● Sample Location		
Project No. 18-054	Scale Not to Scale	Date 2018

**FIGURE 5**  
**SOIL BORING LOCATIONS AND RESULTS**  
0 Paul Avenue, NW  
Atlanta, Georgia

**0 Paul Avenue Brownfield Property**  
**PPCAP Comments**  
**September 30, 2019**

1. Section 1.3 Site History

- a. This section discusses the history of some of the adjacent sites, but doesn't mention the drum facility until in the next section. Please include the drum facility here as well, and describe its location.
- b. Since no figure shows the location of the power plant, please state that it is located north of the RR track and north of the Chattahoochee River.
- c. Same with the concrete plant, that it is located south of the RR track and south of the river.
- d. We also request that you add a figure that labels the GA Power plant, the concrete plant, the specific 2386 Paul Ave parcel, the drum site, the other parcels owned by GA Power, and the 0 Paul Ave. subject property. Reference this added figure where appropriate in the text of the CAP.

2. Section 1.4 Previous Environmental Investigations

- a. Please rearrange this section to chronological order.
- b. This section mentions the "initial listing", but no details beyond that. Please elaborate to include more detail of the HSI initial listing (sites, parcels, dates, sub-listings, etc.) and reference the appropriate figure.
- c. In the paragraph talking about the groundwater well on GA Power's property, please give a general description where this well is physically located, since their property is expansive.
- d. This section should also give some indication what classes of contaminants (VOCs, PCBs, metals, etc.) were investigated. Lab reports only show "lead", but text indicates As, Ba, Cr, Ag were also found in soil/GW.
- e. The last paragraph should indicate what report demonstrated this conclusion (CSRs ?) and what parcels/sites/properties did the conclusion apply to (GA Power parcels, the subject property, the 2386 Paul parcel, etc.).
- f. This section should conclude with a statement about when the site was delisted and include a copy of the delisting letter in the appendix.

3. Section 4 Corrective Action Plan

- a. The section only mentioned "Lead" as a concern, but other contaminants were mentioned previously in the CAP, with no explanation why those are not part of the Corrective Action Plan. Please explain or expand analysis.
- b. Section 4.2 indicates that no corrective action has been completed, but Figure 4 shows that corrective action extended onto this parcel.
- c. We suggest adding groundwater evaluation to your scope in order to establish baseline conditions. Or provide additional details/explanation of current groundwater conditions that are based on recent sampling. It would also be good to mention somewhere in the text what the depth is of groundwater at the site and the direction of flow (assume toward the river).

**Suggestions for the future CSR**

The layout of Tables 1 and 2 in the text of the CAP are hard to follow and need to be revised for clarity in the CSR.

# Appendix B

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## ETRI Design Phase Investigation Scope of Work



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**Environmental Technology Resources, Inc.**

April 2, 2020

Mr. Douglas Strait, P.E.  
Project Manager  
Cardno  
2000 First Drive, Suite 200  
Marietta, Georgia 30062  
Submitted via email: [douglas.strait@cardno.com](mailto:douglas.strait@cardno.com)

Re: Proposal to Conduct Additional Soil and Groundwater Investigations, Provide Oversight and Confirmation Testing During Corrective Actions and Prepare a Prospective Purchaser Compliance Status Report for the Property Located at 0 Paul Avenue in Atlanta, Georgia

Dear Mr. Strait:

**ENVIRONMENTAL TECHNOLOGY RESOURCES, INC.**, (ETRI) is pleased to present you with the following proposal to conduct soil and groundwater investigations, conduct oversight and confirmation sampling during corrective actions and prepare a prospective purchaser compliance status report for the property located at 0 Paul Avenue in Atlanta, Fulton County, Georgia (“subject property”).

Previous investigations have determined soils on the property contain Lead above residential risk reduction standards. The City of Atlanta currently requires that soils have concentrations of Lead no greater than 270 mg/Kg. An estimated 630 tons of soil will need to be removed and disposed off-site.

The purchaser of the property (The Conservation Fund) entered into the Georgia Brownfield Program prior to purchasing the property. The Georgia EPD has requested that groundwater investigations be performed to determine if groundwater has been impacted by the release. In addition, the EPD would like additional analyses of soils to verify that the concentrations of Lead and other RCRA metals do not exceed risk reduction standards.

This proposal is based on information developed during previous investigations and corrective actions that will be required to demonstrate compliance with residential risk reduction standards.

#### **SCOPE OF WORK**

The following tasks will be completed for this project:

##### ***Property Survey***

- Hughes Ray will be retained to survey the property and identify property boundaries. The survey will be used to define the limits of the property during additional investigations and corrective actions.

### ***Soil and Groundwater Investigations***

- Contact the Utility Protection Center to identify underground utilities in the planned soil boring locations.
- Install six additional soil borings on the property for the purpose of characterizing possible soil and groundwater contamination. Four of the borings will be installed on the north-northwest side of the property in an area not previously investigated. One boring will be installed adjacent to boring B1 which was previously found to have a high concentration of total Lead. A soil sample will be collected from this boring at a depth of 1.5 feet and the sample will be analyzed for leachable (TCLP) RCRA Metals. The results of this analyses will be used to determine whether the soils are considered to be non-hazardous waste and can be disposed in a Subtitle D Landfill. Each of the soil borings will be installed to a depth of approximately 5 to 25 feet below ground surface (if possible). Soil samples will be collected at depths of 0-1 feet and below one foot in five of the borings. Temporary wells will be installed in three locations, one upgradient and two down gradient. Based on the results of previous groundwater investigations, we have assumed that the temporary wells will be installed to a depth of 25 feet below ground surface. Soil boring and temporary well locations are shown in the attached figure.
- Purge the temporary monitoring wells. After a minimum of 24 hours after purging, samples will be collected from the temporary wells for laboratory analyses.
- Determine the top of casing elevations for the temporary wells. The depth to groundwater readings and top of casing elevations will allow for the determination of groundwater elevations and groundwater flow direction.
- Analyze the soil samples for total RCRA Metals. The groundwater samples will be analyzed for total and dissolved RCRA Metals.
- Analytical Environmental Services, Inc. of Atlanta, Georgia will complete the sample analyses.

### ***Soil Corrective Actions***

- ETRI will prepare a waste profile and submit the profile for possible disposal in a Subtitle D Landfill. The results of the total and TCLP soil sample analyses will be included in the waste profile.
- ETRI will provide oversight during the excavation and disposal of soil. ETRI will coordinate the efforts of the soil removal contractor, sign manifests on behalf of the owner and collect confirmation soil samples for analyses. We have estimated that twelve confirmation samples will be collected for analyses. Each sample will be analyzed for total Arsenic, Barium, Chromium, Lead and Silver. No side wall samples will be collected along the property lines per Georgia Brownfield Program guidelines.
- The confirmation samples will be analyzed by Analytical Environmental Services of Atlanta, Georgia. Given that an on-going excavation effort is being performed, we would recommend that next-day or two-day analyses be performed.

### ***Prospective Purchaser Compliance Status Report***

- Prepare a Prospective Purchaser Compliance Status Report (PPCSR) for submission to the Georgia Environmental Protection Division – Brownfield Group. The results of investigations

and corrective actions will be incorporated into the PPCSR.

**COSTS AND CONTRACTING**

ETRI has estimated the costs for the survey, soil boring and temporary well installations, collection and analyses of soil and groundwater samples, oversight during corrective actions, confirmation sample analyses and preparation of the Prospective Purchaser Compliance Status Report. The following summarizes the estimated costs for this project.

<u>Task</u>	<u>Estimated Costs</u>
1. <i>Property Survey – Hughes Ray</i>	\$1,500.00
2. <i>Utility Locate Services, Soil Boring Installations, Temp Well Installation, Soil and Groundwater Sampling and Analyses</i>	
- Geoprobe Company, Mob/Demob, Soil Borings (One Day)	\$2,035.00
- Temp Well Materials (25 ft. per well @ \$6.50/ft.)	\$ 487.50
- Project Scientist – 14 hours @ \$70/hour	\$ 980.00
- Mileage:	\$ 40.00
- Peristaltic Pump Rental	\$ 25.00
- Transite Level Rental	\$ 25.00
- Expendables, Tubing, Gloves, Ice	\$ 60.00
- Soil Sample Analyses:	
Total RCRA Metals - 10 samples @ \$98.00/sample	\$ 980.00
TCLP RCRA Metals - 1 sample @ \$145.00/sample	\$ 145.00
- Groundwater Sample Analyses: Three samples	
Total RCRA Metals - 3 samples @ \$110.00/sample	\$ 330.00
Dissolved RCRA Metals - 3 samples @ \$120.00/sample	\$ 360.00
3. <i>Oversight During Corrective Actions, Confirmation Sampling and Analyses</i>	
- Project Scientist – 48 hours @ \$70/hour	\$3,360.00
- Mileage: 6 Trips	\$ 120.00
- Expendables, Gloves, Ice	\$ 25.00
- Confirmation Soil Sample Analyses: 2-day	
Total As, Ba, Cd, Pb and Ag - 12 samples @ \$72.00/sample	\$ 864.00
4. <i>Preparation of Prospective Purchaser CSR</i>	\$2,730.00
Professional Geologist 4 hours @ \$75/hour	
Project Scientist 32 hours @ \$70/hour	
Draftsman 2 hours @ \$55/hour	
Printing/Postage - \$50	

Mr. Doug Strait  
0 Paul Avenue, Atlanta, Georgia  
Soil and Groundwater Investigations, Corrective Actions Oversight and PPCSR Proposal  
Page 4

5. *Review Documents, Meetings* \$ 4200.00  
Project Scientist 6 hours @ \$70/hour

**Total Estimated Costs** **\$14,486.50**

The following assumptions were made in preparing this estimate:

1. The analytical prices quoted are for a standard 5-6 day turnaround for analyses. Additional costs will be incurred for expedited analyses. The additional surcharge for expedited analyses is 50% for next day analyses and 25% for a two-day turnaround. Analytical costs quoted for samples collected during corrective actions are for a two-day turnaround.
2. Temporary wells can be installed using DPT. No costs are included for rock drilling.
3. The costs for the drilling services assumes the soil boring installation and sampling can be completed in one full day. Additional costs could be incurred if the soil boring and sampling exceeds one day.

ETRI appreciates the opportunity to prepare this proposal and looks forward to working with you on this project. Please feel free to contact me at (770) 888-8181 with any questions concerning this proposal.

Sincerely,  
**ENVIRONMENTAL TECHNOLOGY RESOURCES, INC.**



Thomas R. Harper  
Technical Director

**Authorization**  
Agreed and Accepted By:

\_\_\_\_\_  
(Signature and Title)

Attachment

18-054.102

\_\_\_\_\_  
(Date)



Source: Fulton Co Tax Assessor

- Soil Boring
- ⊕ Soil Boring/Temporary Well

### ETRI

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

### PROPOSED SOIL BORING/TEMP WELL LOCATION MAP

0 Paul Avenue  
Atlanta, Georgia  
Project Number 18-054