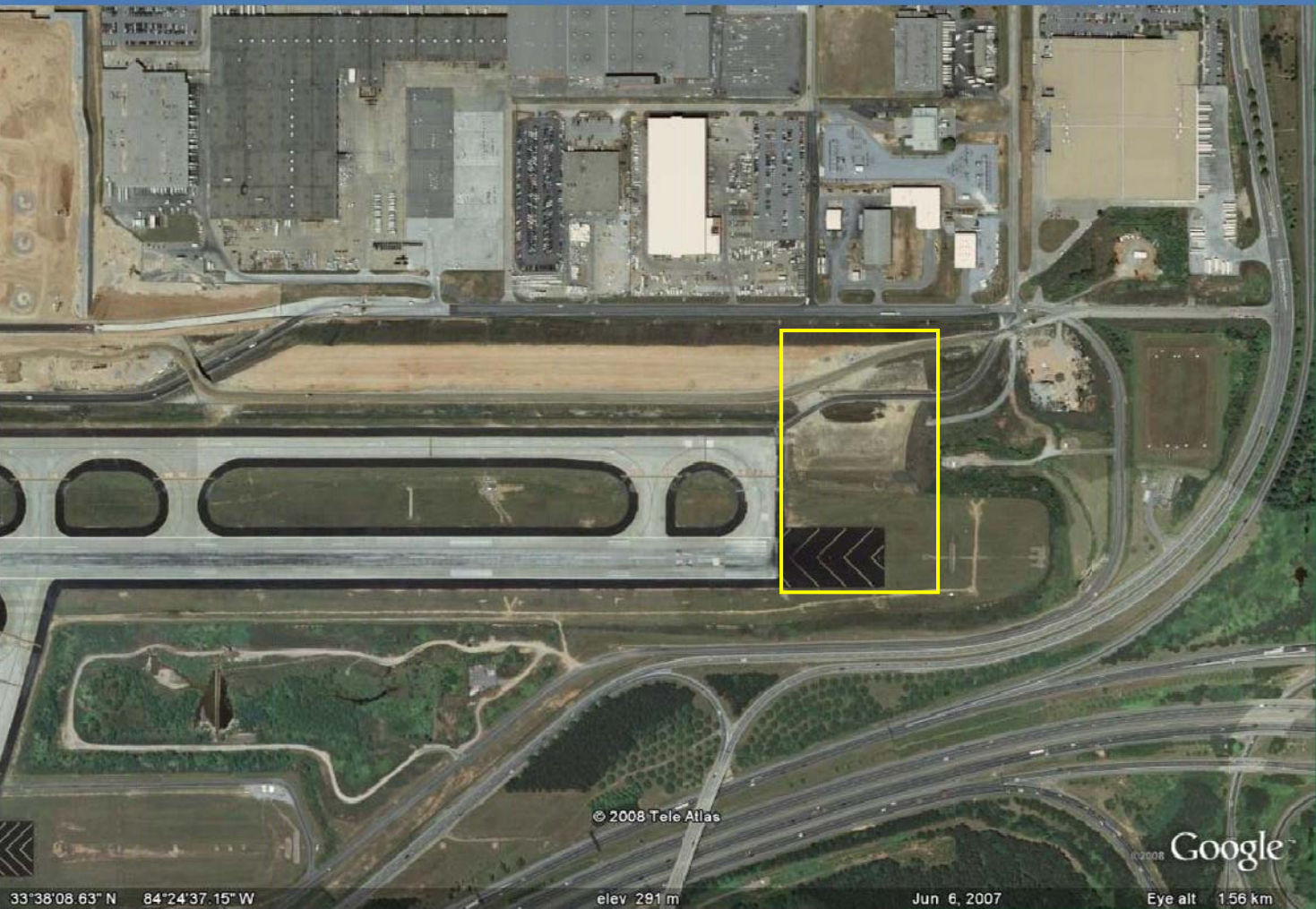


## **Appendix B**

### **Phase I Environmental Site Assessment**

2008

# Runway 27R H-JAIA Phase I Environmental Assessment Report



**John Wright & Associates, LLC**  
*A Consulting and Technical Services Firm*



## TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY.....	4
1.1 Location.....	4
1.2 Environmental Concerns and Conclusions.....	4
1.2.1 On Site.....	5
1.2.2 Off-Site.....	5
1.3 Conclusions and Recommendations.....	6
2.0 INTRODUCTION.....	7
2.1 Purpose.....	8
2.2 Scope.....	9
2.3 Significant Assumption.....	10
2.4 Limitations.....	11
2.5 Special Terms and Conditions.....	11
2.6 User Reliance.....	12
3.0 SITE DESCRIPTION.....	12
3.1 Location and Legal Description.....	12
3.2 Site and Vicinity General Characteristics.....	13
3.3 Current Use of Assessment Area.....	13
3.4 Description of Structures, Roads, and Other Improvements the Assessment Area..	13
3.5 Current Use of Adjoining Properties.....	13
4.0 USER PROVIDED INFORMATION.....	13
4.1 Title Records.....	13
4.2 Environmental Liens or Activity and Use Limitations.....	14
4.3 Specialized Knowledge of User.....	14
4.4 Commonly Known Information.....	14



4.5 Valuation Reduction for Environmental Issues.....14

4.6 Owner, Property Manager, and Occupant Information.....14

4.7 Reason for Performing Phase I.....15

5.0 Records Review.....15

5.1 Standard Environmental Record Sources.....15

5.1.1 Record Search.....15

5.1.2 Listed Regulatory Facilities.....18

5.1.3 Other Notable Facilities.....21

5.1.4 Orphan Facilities.....22

5.1.5 Discussion of Identified Historical Facilities.....22

5.1.6 Discussion of Identified Facilities.....22

5.2 Additional Environmental Record Sources.....23

5.3 Physical Setting Sources.....24

5.4 Historical Use Information.....25

5.4.1 Approach.....26

5.4.2 Project Site.....26

5.4.3 Adjacent Properties.....27

6.0 RECONNAISSANCE.....27

6.1 Assessment Area Reconnaissance.....27

6.1.1 Methodology and Limiting Conditions.....28

6.1.2 Results.....28

6.2 Surrounding Area Reconnaissance.....29

6.2.1 Methodology.....30

6.2.2 Results.....30

7.0 Interviews.....31

7.1 Process.....31

7.2 Property Owners.....32



7.3 Site Manager/Occupant/Local Residents.....32  
7.4 Local Government Officials.....32  
  
8.0 FINDINGS.....32  
9.0 DATA GAPS.....33  
10.0 OPINION.....35  
11.0 CONCLUSIONS.....35  
12.0 DEVIATIONS.....35  
13.0 REFERENCE.....36  
14.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS.....37  
15.0 QUALIFICATIONS.....38

FIGURE

- 1 USGS Topography of the H-JAIA Project Site

TABLES

1 Regulatory Database.....16  
2 Summary of Identified Facilities.....23  
3 Site Reconnaissance Information.....28  
4 Results of the Site Reconnaissance.....31  
5 Data Failures/Gaps .....34

APPENDIX

- A Lien Search and Deed Report
- B Regulatory Database information
- C Aerial Photo Decade Package and Historical Topographic Report
- D City Directory and Sanborn Map Report
- E Assessment Area Site Photographs
- F Interview Forms
- G References
- H Qualifications



## **1.0 EXECUTIVE SUMMARY**

### **1.1 LOCATION**

A subconsultant on the ESAF team, John Wright & Associates, LLC (JWA) conducted a Phase I Environmental Site Assessment (ESA) on ±11.48 acres of vacant land located at the end of Runway 27R at the Hartsfield-Jackson Atlanta International Airport (H-JAIA) as a component of a comprehensive runway extension project planned at the H-JAIA Project Site. The ±11.48 acre Assessment Area abuts the eastern end of Runway 27R adjacent to Loop Road, and is directly west and north of Interstate Highways 75 and 285, respectively. The Assessment Area is located in a predominately industrial area of the City of Atlanta, Clayton County, Georgia. The Assessment Area consists of two different parcels (13-9-9-1 and 13-9-9-1A) being more fully described in the deed records of Clayton County. Parcel 13-9-9-1 represents all of the paved areas of the Assessment Area, and Parcel 13-9-9-1A represents all of the non-paved areas of the Assessment Area.

NOTE: Airport security restrictions limited the ability of EDR researchers to obtain complete information regarding liens and deeds for the Assessment Area in a timely fashion, and thus EDR was not able to fully meet the timeline for this report. The Lien Search and Deed Report will be added to this report upon receipt from EDR.

### **1.2 ENVIRONMENTAL CONCERNS AND CONCLUSIONS**

Based on the site assessment, interviews, and review of available documents, JWA concludes the following:



### 1.2.1 On Site

During the site walkthrough, no underground storage tanks (UST) or aboveground storage tanks (AST) were observed on the Assessment Area, nor were there any indications of the former existence of such storage tanks in the historical records reviewed.

No visual indications of the storage, use, disposal, or random dumping of hazardous materials. In addition, no evidence of the use, storage, or disposal of hazardous materials at the Assessment Area was observed in available aerial photographs or property records reviewed.

### 1.2.2 Off-site

Adjacent and surrounding properties are primarily light commercial and industrial businesses.

The H-JAIA Project Site was not listed as a regulated facility on the Federal or State environmental databases reviewed. A review of federal and state database information identified eight regulated facilities within ASTM-recommended search distances from the Assessment Area.

No.	Facility & Address	Program	Proximity & Direction	Apparent Hydraulic Relation	Potential Impact, Y/N
1	Atlanta Tradeport/GEX Former Fulford Drive @ I-75 & Aviation Blvd Atlanta, GA 30354	LUST	1/8-¼ mile NE	Down-Gradient	N
2	Republic Airlines Hartsfield-Jackson Atlanta International Airport Atlanta, GA 30320	FINDS, RCRA-TSDF, CORRACTS, CERC-NFRAP, GS NON-HSI, RCRA-CESQG, MANIFEST	¼-½ mile NE	Down-Gradient	N
3	Northwest Airlines Hanger 1000 Inner Loop Rd Maintenance F Atlanta, GA 30337	LUST	¼-½ mile NE	Down-Gradient	N



<b>4</b>	Lockheed/North Cargo Tank Farm 1625 Fuel Farm Road Hapeville, GA 30320	LUST	¼-½ mile N	Down-Gradient	<b>N</b>
<b>5</b>	Hartsfield Jackson Atlanta International Airport 1400 Aviation Blvd Atlanta, GA 30320	LUST	¼-½ mile NNW	Down-Gradient	<b>N</b>
<b>6</b>	Delta Dobbs Flight Kitchen 1500 Aviation Blvd Atlanta, GA 30320	SPILLS	¼-½ mile NE	Down-Gradient	<b>N</b>
<b>7</b>	Delta/Air Cargo 1775 Aviation Blvd Atlanta, GA 30320	SPILLS	½ -1 Mile NW	Down-Gradient	<b>N</b>
<b>8</b>	Yancey Brothers Company 211 Aviation Blvd Hapeville, GA 30354	LUST	½ -1 Mile ENE	Down-Gradient	<b>N</b>

Based on current conditions of the listed facilities, their regulatory standing, topography, and distance to the Assessment Area, JWA’s opinion is that none of the listed, regulated facilities present an environmental threat in connection with the Assessment Area.

### 1.3 CONCLUSIONS AND RECOMMENDATIONS

JWA performed this assessment in general conformance with the scope and limitations of ASTM Practice E 1527-05 and the AAI Rule, 40 CFR 312. The objective of this assessment was to identify recognized environmental conditions (RECs) in connection with the Assessment Area including the presence, or likely presence, of any hazardous substances or petroleum products in the Assessment Area under conditions that indicate an existing release, a past release, or a material threat of a release into structures on the Assessment Area or into the ground, groundwater, or surface water. This assessment included an evaluation, to the extent practicable, of the past and present land uses at the Assessment Area and on adjacent properties.

JWA’s professional opinion is that the facilities listed in the database search do not appear to present an environmental concern to the Assessment Area at this time, based on tank



information, spill information, regulatory status, surface topography, and distance from the Assessment Area. The findings and recommendations contained herein are based upon the data that was reviewed and documented in this report along with our experience on similar projects. The discovery of any additional information concerning the environmental conditions at the site should be reported to us for our review so that we can reassess potential environmental impacts and modify our recommendations, if necessary.

## 2.0 INTRODUCTION

John Wright & Associates, LLC (JWA) conducted a Phase I Environmental Site Assessment (ESA) on ±11.48 acres of vacant land located at the end of Runway 27R at the Hartsfield-Jackson Atlanta International Airport (H-JAIA) as a component of a comprehensive runway extension project planned at the H-JAIA Project Site. The ±11.48 acre Assessment Area abuts the eastern end of Runway 27R adjacent to Loop Road, and is directly west and north of Interstate Highways 75 and 285, respectively. The Assessment Area is located in a predominately industrial area of the City of Atlanta, Clayton County, Georgia. The Assessment Area consists of two different parcels (13-9-9-1 and 13-9-9-1A) being more fully described in the deed records of Clayton County, Georgia. Parcel 13-9-9-1 represents all of the paved areas of the Assessment Area, and Parcel 13-9-9-1A represents all of the non-paved areas of the Assessment Area.

NOTE: Airport security restrictions limited the ability of EDR researchers to obtain complete information regarding liens and deeds for the Assessment Area in a timely fashion, and thus EDR was not able to fully meet the timeline for this report. The Lien Search and Deed Report will be added to this report upon receipt from EDR.

The initial site reconnaissance was performed on October 30, 2008 by Mr. John Wright of the Atlanta, Georgia, office. Mr. Wright has over fifteen years of experience conducting ESAs.



## 2.1 Purpose

The purpose of this assessment was to determine whether there is evidence of recognized environmental conditions (RECs) in connection with the ±11.48 acre vacant Assessment Area located at the end of Runway 27R at the H-JAIA Project Site. The protocol used for this assessment is in substantial conformance with the American Society for Testing and Materials (ASTM) Practice E 1527-05, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, and the All Appropriate Inquiry (AAI) Rules, 40 CFR 312.

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

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

The Practice E 1527-05 and the AAI Rule were developed to satisfy one of the requirements to qualify for the innocent landowners liability protection, the contiguous property owner protection, and/or the bona fide prospective purchaser protection provided for in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Small Business Liability Relief and Brownfields Revitalization of Act of 2002. The ASTM approach constitutes a limited, but commercially prudent and reasonable, inquiry. The Practice E 1527-05



Standard has been prepared to meet the AAI requirements. This assessment was, therefore, performed to identify environmental concerns that may be discerned by visual observation and information-gathering procedures.

## **2.2 Scope**

The scope of services, which follows ASTM Standard E 1527-05 and the AAI Rule, included the following items:

1. Reconnaissance of the Assessment Area and surrounding area, with a focus on environmental issues;
2. Research of readily available Federal and State Environmental agency records for evidence of hazardous substance or related activities on or near the Assessment Area. This included the: LUST, NPL, CERCLIS, Registered UST, RCRA-TSD, RCRA-Generators, ERNS and other reasonable ascertainable files;
3. Research of reasonably available tribal records for the Assessment Area and nearby properties;
4. Review of available historic maps, city directories, Sanborn Insurance maps, and aerial photographs to assess area history and past use of the Assessment Area;
5. Interviews with the current property owner, past property owners, local residents and firms adjacent to the Assessment Area, as possible, to assess past use and present activities which may have impacted the Assessment Area, and;
6. Preparation of this report to document the results of the site reconnaissance, historical and regulatory research and interviews, and to provide JWA's professional opinion of the environmental conditions of the Assessment Area.



Our scope of services did not include sampling of the soil and groundwater at the site.

### **2.3 Significant Assumptions**

This Assessment was based on the following significant assumptions in the preparation of this report:

- Site Use – Possible extension of Runway 27R eastward onto the ±11.48 acre Assessment Area at the H-JAIA Project Site.
- Groundwater Flow Direction – The direction of groundwater flow in the vicinity of the property has been inferred based on the site observations of topographic slope, proximity of nearby water bodies, and review of the current USGS topographic map.
- Regulatory Records Information – This assessment is based on information provided by Environmental Data Resources, Inc (EDR) regarding the regulatory status of facilities within the minimum search distances, and that this data is complete, accurate, and current.
- Data Gaps – Only the identified significant data gaps affect the assessment.
- Other – This assessment is also based on all information provided through interviews of pertinent agencies, occupants, users, and persons familiar with the property being complete and unbiased.

These limitations are referred to in the ASTM Standard as assumptions. They form part of the basis for the assessment performed for this H-JAIA Project Site. If any of these items are not accurate, JWA must be so informed so appropriate re-assessment can be performed.



## **2.4 Limitations**

JWA has performed appropriate inquiry for this Phase I Environmental Assessment in general conformance with the scope and limitations of ASTM Practice E 1527-05 and 40 CFR 312, the AAI Rule. In accordance with this practice, vapor intrusion, asbestos mold, lead testing, radon, endangered species and wetlands work are excluded from the standard scope of work for Phase I Environmental Assessments. No environmental site assessment can wholly eliminate uncertainty regarding the potential for RECs in connection with a site. JWA's assessment is based on a visual evaluation of the surficial conditions, and is a professional opinion, only. No other warranty or guarantee is expressed or implied. This report must be considered in its entirety.

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

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

## **2.5 Special Terms and Conditions**

The terms and conditions for this Phase I Environmental Assessment were set forth in JWA's October 9, 2008, work order that was signed on October 10, 2008. A significant condition of this



agreement was that ESAF would be responsible for providing JWA with information regarding environmental liens, and Activity and Use Limitations.

## **2.6 User Reliance**

This report is for the exclusive use of ESAF and H-JAIA, and may be used only in reference to the project described herein. JWA is not responsible for the conclusions, opinions or recommendations of others.

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

## **3.0 SITE DESCRIPTION**

### **3.1 Location and Legal Description**

The Assessment Area consists of ±11.48 acres of land located at the eastern end of Runway 27R at the H-JAIA Project Site. The Assessment Area is comprised of two distinct parcels (13-9-9-1 and 13-9-9-1A). Parcel 13-9-9-1 represents all of the paved areas of the Assessment Area, and Parcel 13-9-9-1A represents all of the non-paved areas of the Assessment Area. Airport security restrictions limited the ability of EDR researchers to obtain complete information regarding liens and deeds for the Assessment Area in a timely fashion, and thus EDR was not able to fully meet the timeline for this report. The Lien Search and Deed Report will be added to this report upon receipt from EDR. An undated survey plat compiled by the County Tax Office was provided by the client and was used as a guide to locate the H-JAIA Project Site and Assessment Area boundaries during the site reconnaissance. The lien search and deed report is reproduced in Appendix A.



### **3.2 Site and Vicinity General Characteristics**

The Assessment Area consists of ±11.48 acres of vacant land that abuts the east end of Runway 27R at the H-JAIA Project Site. The Assessment Area is adjacent to Loop Road in a predominantly industrial area of The City of Atlanta, Clayton County, Georgia. The areas surrounding the H-JAIA Project Site are predominantly residential and light commercial and industrial properties.

### **3.3 Current Use of Assessment Area**

A site reconnaissance was conducted on October 30, 2008 by John Wright. At that time, the Assessment Area was cleared, vacant land and well maintained.

### **3.4 Description of Structures, Roads, Other Improvements of the Assessment Area**

The Assessment Area contains no structures.

### **3.5 Current Use of Adjoining Properties**

The properties surrounding the Assessment Area on the north, east, south and west sides are predominantly industrial. There is on-going construction on an additional terminal to the north lot line. There were industrial properties to the south and east of the H-JAIA Project Site.

## **4.0 USER PROVIDED INFORMATION**

### **4.1 Title Records**

JWA requested title records from the client; however, no title records for the H-JAIA Project Site were provided.



#### **4.2 Environmental Liens or Activity and Use Limitations**

ESAF stated that they were unaware of any environmental liens, or activity and use limitations associated with the H-JAIA Project Site. JWA requested a lien search through the EDR database.

#### **4.3 Specialized Knowledge of User**

ESAF indicated to JWA that they did not have specialized knowledge that is material to determining RECs in connection to the H-JAIA Project Site.

#### **4.4 Commonly Known Information**

ESAF was unaware of any commonly known information from within the local community that is material to RECs in connection to the Assessment Area. JWA also conducted interviews with available local persons during the reconnaissance in an attempt to obtain commonly known information concerning the H-JAIA Project Site. Details of the interviews performed are included in Section 7 of this report.

#### **4.5 Valuation Reduction for Environmental Issues**

ESAF indicated to JWA that the purchase price of the Assessment Area was similar to other properties, and thus, not significantly lower than equal properties in the surrounding area.

#### **4.6 Owner, Property Manager, and Occupant Information**

According to the client-provided information, the City of Atlanta owns the deeds to the Assessment Area. The City Council and H-JAIA is the property manager of the entire H-JAIA Project Site.



#### **4.7 Reason for Performing Phase I**

This Phase I Environmental Assessment was conducted with the understanding that H-JAIA is planning on extending Runway 27R eastward onto the ±11.48-acres Assessment Area.

### **5.0 RECORDS REVIEW**

This section provides current and historical information regarding the environmental integrity of the site. Government and public documents were reviewed to compile the following information.

#### **5.1 Standard Environmental Record Sources**

Reasonably ascertainable Federal and State environmental agency records were reviewed for evidence of regulated or investigated facilities within the minimum search distances outlined by ASTM E 1527-05 and 40 CFR 312. The search distances are for the H-JAIA Project Site, adjoining properties, property within 0.5 mile, or property within 1.0 mile.

##### **5.1.1 Record Search**

JWA utilized a commercial database reporting company (EDR) to provide Federal, State, and Tribal environmental records. The search was conducted by selecting a center point within the interior of the H-JAIA Project Site and then expanding the search distances (in ¼-mile increments) as necessary, based on the distance from the center point to the furthest H-JAIA Project Site boundary. Therefore, some facilities may appear within the database report that are actually beyond the required search distances. JWA located the listed facilities and referenced in this report only those facilities confirmed to be within the respective ASTM or AAI search distance. A copy of the database report used for the regulatory agency review is



included in Appendix B. The number of facilities identified and search records reviewed are listed in Table 1.

**TABLE 1: REGULATORY DATABASES**

DATABASE	DATE UPDATED	NUMBER AT PROJECT SITE	NUMBER WITHIN SEARCH RADII
<b>AAI SEARCH DISTANCE: 1 - 1.5 MILE</b>			
United States Environmental Protection Agency (US EPA) National Priority List ( <b>NPL</b> )	August 2008	0	0
State Hazardous Waste Sites ( <b>SHWS</b> )	July 2008	0	1
Georgia Hazardous Response Act (HSRA) Non Hazardous Sites Inventory ( <b>GA NON-HSI</b> )	July 2008	0	5
<b>AAI SEARCH DISTANCE: ½ - 1 MILE</b>			
Resource Conservation and Recovery Act ( <b>RCRA</b> ) Conditionally Exempt Small Quantity Generators ( <b>CESQG</b> )	August 2008	0	3
Resource Conservation and Recovery Act ( <b>RCRA</b> ), Non Generators	August 2008	0	9
Georgia Hazardous Response Act (HSRA) Non Hazardous Sites Inventory ( <b>GA NON-HSI</b> )	July 2008	0	1
Georgia Environmental Protection Division ( <b>GA EPA</b> ) Leaking Underground Storage Tank ( <b>LUST</b> )	May 2008	0	3
Georgia Environmental Protection Division ( <b>GA EPA</b> ) Underground Storage Tank ( <b>UST</b> ) Database	February 2008	0	3



<b>AAI SEARCH DISTANCE: ¼ - ½ MILE</b>			
US EPA Comprehensive Environmental Response, Compensation, and Liability Information System ( <b>CERCLIS</b> ) database No Further Remedial Action Planned ( <b>NFRAP</b> ) database	December 2007	0	1
Corrective Action Report ( <b>CORRACTS</b> )	June 2008	0	1
US EPA Resource Conservation and Recovery Act – Treatment, Storage and Disposal Facilities ( <b>RCRA TSDF</b> ) List	June 2008	0	1
Resource Conservation and Recovery Act ( <b>RCRA</b> ) Conditionally Exempt Small Quantity Generators ( <b>CESQG</b> )	August 2008	0	1
Resource Conservation and Recovery Act ( <b>RCRA</b> ), Non Generators	August 2008	0	1
Emergency Response Notification System ( <b>ERNS</b> )	December 2007	0	17
Hazardous Materials Information Reporting System ( <b>HMIRS</b> )	April 2008	0	2
Department of Transportation, Office of Pipeline Safety Incident and Accident data ( <b>DOT OPS</b> )	May 2008	0	1
Facility Index System/ Facility Registry System ( <b>FINDS</b> )	July 2008	0	3
Georgia Hazardous Response Act (HSRA) Non Hazardous Sites Inventory ( <b>GA NON-HSI</b> )	July 2008	0	3
Georgia Environmental Protection Division ( <b>GA EPA</b> ) Leaking Underground Storage Tank ( <b>LUST</b> )	May 2008	0	4



Georgia Environmental Protection Division (GA EPA) Underground Storage Tank (UST) Database	February 2008	0	5
Oil or Hazardous Material Spills or Releases (SPILLS)	July 2008	0	10
<b>AAI SEARCH DISTANCE: 1/8 - 1/2 MILE</b>			
Georgia Environmental Protection Division (GA EPA) Leaking Underground Storage Tank (LUST)	May 2008	0	1
Georgia Environmental Protection Division (GA EPA) Underground Storage Tank (UST) Database	February 2008	0	1
<p><b>NOTES:</b></p> <p>The list/database information was obtained from Environmental Data Resources (EDR). EDR updates their system information routinely. Their databases are derived from databases developed by various government agencies. JWA cannot warrant the accuracy of the information included in these databases. The EDR data was relied upon for this assessment.</p> <p>*No Federal Tribal Lands are located within Georgia; therefore, no Tribal LUST or UST files exist for Georgia.</p>			

### 5.1.2 Listed Regulated Facilities

The H-JAIA Project Site was not listed as a regulated facility on the Federal or State environmental databases reviewed. There were seventy-seven (77) listed regulated facilities identified by EDR within the various search distances from the H-JAIA Project Site. Eight of the facilities reported contamination of soil or groundwater under the Georgia Hazardous Site Response Act (HSRA) of which five (5) were characterized as a Leaking Underground Storage Tank (LUST). These sites were not placed on the Georgia Priority lists (Hazardous Site Inventories or HSI) because their hazard evaluation scores did not exceed the threshold levels established for sites posing an imminent threat to health or the environment. Two sites were listed as Oil or Hazardous Material Spills or Releases (SPILLS) facilities. One facility was listed on multiple agencies databases (FINDS, RCRA-TSDF, CORRACTS, CERC-NFRAP, GA NON-HIS, RCRA-CESQG and MANIFEST).



Based on current conditions of the listed facilities, topographical relation to the Assessment Area, and distance to the Assessment Area, JWA's opinion is that none of the listed, regulated facilities present an environmental threat in connection with the Assessment Area.

1. Atlanta Tradeport/GEX Former  
Fulford Drive @ I-75 & Aviation Blvd  
Atlanta, GA 30354  
(Located 1/8-1/4 mile NE, and is lower than the H-JAIA Project Site)

Atlanta Tradeport/GEX Former was listed on the state and local databases reviewed as a Leaking Underground Storage Tank (LUST)(U003551350) site. There was no groundwater pathway or On-site pathway score reported. Based on the current condition of the facility, their regulatory standing, topographical relationship to the Assessment Area, and distance from the Assessment Area, JWA's opinion is that this facility does not present REC in connection with the H-JAIA Project Site.

2. Republic Airlines (Northwest Airlines)  
Hartsfield-Jackson Atlanta International Airport  
Atlanta, GA 30320  
(Located 1/4-1/2 mile NE, and is lower than the H-JAIA Project Site)

Republic Airlines was listed on the state and local databases reviewed as a FINDS, RCRA-TSDF, CORRACTS, CERC-NFRAP, GA NON-HSI, RCRA-CESQG and MANIFEST site. Since 2006 to the present, Republic Airlines has been classified as a Conditionally Exempt Small Quantity Generator (CESQG). From 1990 to 2005 Republic Airlines was classified as a large quantity generator and had numerous violations which are located in Appendix B of the report. Based on the current condition of the facility, their regulatory standing, topographical relationship to the Assessment Area, and distance from the Assessment Area, JWA's opinion is this facility does not present REC in connection with the H-JAIA Project Site.

3. Northwest Airlines Hanger  
1000 Inner Loop Road Maintenance F  
Atlanta, GA 30337  
(Located 1/4 - 1/2 mile NE, and is lower than the H-JAIA Project Site)

Northwest Airlines Hanger was listed on the state and local databases reviewed as a Leaking Underground Storage Tank (LUST)(U003005141). The Northwest Airlines Hanger was also classified as a SPILLS and UST site. There was no groundwater pathway or On-site pathway score reported. Based on the current condition of the facility, their regulatory standing, topographical relationship to the Assessment Area, and distance from the Assessment Area, JWA's opinion is that this facility does not present REC in connection with the H-JAIA Project Site.



4. Lockheed/North Cargo Tank Farm  
1625 Fuel Farm Road  
Hapeville, GA 30320  
(Located  $\frac{1}{4}$  -  $\frac{1}{2}$  mile N, and is lower than the H-JAIA Project Site)

Lockheed/North Cargo Tank Farm was listed on the state and local databases reviewed as a Leaking Underground Storage Tank (LUST)(U001478041). Lockheed/North Cargo Tank Farm has had two confirmed releases of gasoline in 1994 and 2006. Lockheed/North Cargo Tank Farm received a No Further Action (NFA) Letter for both spills. There was no groundwater pathway or On-site pathway score reported. Based on the current condition of the facility, their regulatory standing, topographical relationship to the Assessment Area, and distance from the Assessment Area, JWA's opinion is that this facility does not present REC in connection with the H-JAIA Project Site.

5. Hartsfield Jackson Atlanta International Airport  
1400 Aviation Blvd  
Atlanta, GA 30320  
(Located  $\frac{1}{4}$  -  $\frac{1}{2}$  mile NNW, and is lower than the H-JAIA Project Site)

Hartsfield Jackson Atlanta International Airport was listed on the state and local databases reviewed as a Leaking Underground Storage Tank (LUST)(S102602467). Hartsfield Jackson Atlanta International Airport had a confirmed release of diesel fuel in 2005. Hartsfield Jackson Atlanta International Airport received a No Further Action (NFA) Letter for both spills. There was no groundwater pathway or On-site pathway score reported. Based on the current condition of the facility, their regulatory standing, topographical relationship to the Assessment Area, and distance from the Assessment Area, JWA's opinion is that this facility does not present REC in connection with the H-JAIA Project Site.

6. Delta Dobbs Flight Kitchen  
1500 Aviation Blvd  
Atlanta, GA 30320  
(Located  $\frac{1}{4}$  -  $\frac{1}{2}$  mile NNW, and is lower than the H-JAIA Project Site)

Delta Dobbs Flight Kitchen was listed on the SPILLS (U001475129) database. Delta Dobbs Flight Kitchen had a confirmed release of diesel fuel (<500 G) in 2001. A faulty valve caused the spill and some diesel fuel entered the storm drain. Delta Dobbs Flight Kitchen had a contractor on site to perform the cleanup. There was no groundwater pathway or On-site pathway score reported. Based on the current condition of the facility, their regulatory standing, topographical relationship to the Assessment Area, and distance from the Assessment Area, JWA's opinion is that this facility does not present REC in connection with the H-JAIA Project Site.



7. Delta/Air Cargo  
1775 Aviation Blvd  
Atlanta, GA 30320  
(Located ½ - 1 mile NW, and is lower than the H-JAIA Project Site)

Delta/Air Cargo was listed on the SPILLS (U001629136) database. Delta/Air Cargo had a confirmed release of diesel fuel (<35 G) in 2001. Gasoline entered the storm drain and subsequently entered Mudd Creek. Based on the current condition of the facility, their regulatory standing, topographical relationship to the Assessment Area, and distance from the Assessment Area, JWA's opinion is that this facility does not present REC in connection with the H-JAIA Project Site.

8. Yancey Brothers Company  
211 Aviation Blvd  
Hapeville, GA 30354  
(Located ½ - 1 mile ENE, and is lower than the H-JAIA Project Site)

Yancey Brothers Company was listed on the state and local databases reviewed as a Leaking Underground Storage Tank (LUST)(U001475316). The Yancey Brothers Company had a confirmed spill of gasoline in 1992. There was no groundwater pathway or On-site pathway score reported. Based on the current condition of the facility, their regulatory standing, topographical relationship to the Assessment Area, and distance from the Assessment Area, JWA's opinion is that this facility does not present REC in connection with the H-JAIA Project Site.

JWA performed this assessment in general conformance with the scope and limitations of ASTM Practice E 1527-05 and the AAI Rule, 40 CFR 312. While there may be sites listed in the EDR report in addition to those specifically described herein, based on our experience conducting Phase I ESA's, and on the current conditions of the listed facilities, their regulatory standing, topography, and distance to the Assessment Area, JWA has determined that these sites do not present an environmental threat in connection with the Assessment Area and thus are not discussed in detail.

### **5.1.3 Other Notable Facilities**

Per the AAI Rules, 40 CFR 312<sup>2</sup>, other notable facilities include those businesses, properties or facilities that were not listed as regulated facilities, but were observed during the reconnaissance and could represent potential RECs. There were no other notable facilities identified during the reconnaissance.



#### **5.1.4 Orphan Facilities**

The regulatory database report includes a list (Orphan List) of facilities that could not be mapped due to poor or incomplete address information. JWA reviewed this list, which included 23 orphan facilities. Based on JWA's map review and field reconnaissance, the 23 orphan facilities do not appear to be within the ASTM or AAI search distance from the H-JAIA Project Site.

#### **5.1.5 Discussion of Identified Historical Facilities**

EDR has compiled a proprietary compilation of potential historical facilities by searching business directories available to EDR. The facilities identified in this compilation include those facilities that may have operated as gas stations/filling stations/service stations or dry cleaning establishments. The EDR historical compilation did not identify historical facilities within 0.25 miles from the Assessment Area.

#### **5.1.6 Discussion of Identified Facilities**

The following table summarizes the facilities identified in the vicinity of the Assessment Area and provides our conclusion concerning whether the facility represents a REC to the Assessment Area. Where the determination for a potential REC is based on information other than distance, topographic relation, and/or EDR information, additional information is discussed below.



**TABLE 2: SUMMARY OF IDENTIFIED FACILITIES**

No.	Facility & Address	Program	Proximity & Direction	Apparent Hydraulic Relation	Potential Impact, Y/N
1	Atlanta Tradeport/GEX Former Fulford Drive @ I-75 & Aviation Blvd Atlanta, GA 30354	LUST	1/8-¼ mile NE	Down-Gradient	N
2	Republic Airlines Hartsfield-Jackson Atlanta International Airport Atlanta, GA 30320	FINDS, RCRA-TSDF, CORRACTS, CERC-NFRAP, GS NON-HSI, RCRA-CESQG, MANIFEST	¼-½ mile NE	Down-Gradient	N
3	Northwest Airlines Hanger 1000 Inner Loop Rd Maintenance F Atlanta, GA 30337	LUST	¼-½ mile NE	Down-Gradient	N
4	Lockheed/North Cargo Tank Farm 1625 Fuel Farm Road Hapeville, GA 30320	LUST	¼-½ mile N	Down-Gradient	N
5	Hartsfield Jackson Atlanta International Airport 1400 Aviation Blvd Atlanta, GA 30320	LUST	¼-½ mile NNW	Down-Gradient	N
6	Delta Dobbs Flight Kitchen 1500 Aviation Blvd Atlanta, GA 30320	SPILLS	¼-½ mile NE	Down-Gradient	N
7	Delta/Air Cargo 1775 Aviation Blvd Atlanta, GA 30320	SPILLS	½ -1 Mile NW	Down-Gradient	N
8	Yancey Brothers Company 211 Aviation Blvd Hapeville, GA 30354	LUST	½ -1 Mile ENE	Down-Gradient	N

**5.2 Additional Environmental Record Sources**

An Internet search using the Google and Yahoo search engines was conducted for the address of the H-JAIA Project Site. The query did not provide results of any significant environmental information for the H-JAIA Project Site.



### 5.3 Physical Setting Sources

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

The H-JAIA Project Site is located in the Piedmont Physiographic Province of Georgia, which is characterized by medium- to high-grade metamorphic rocks and scattered igneous intrusions. Topography in the province is variable and ranges from gently rolling hills in the east to moderate hills in the northwest. Based on the United States Geological Survey (USGS) 7.5-minute topographic quadrangle map of the area, entitled *Southwest Atlanta, Georgia*, dated 1997, elevations in the vicinity of the H-JAIA Project Site range from approximately 950 feet above mean sea level (ft msl) to over 990 ft msl. The Assessment Area is located along an area with an approximate elevation range of 964 ft msl to over 980 ft msl. Topography at the Assessment Area slopes to the east-southeast. Surface water flow at the Assessment Area and immediate vicinity generally flows away from the center of the Assessment Area to the southern and eastern extent of the Assessment Area. Figure 1 shows the USGS topography of the H-JAIA Project Site and surrounding areas.

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



In the Piedmont Physiographic Province, the upper groundwater zone is located in residual soils that are underlain by bedrock. Groundwater flow in the upper zone is generally unconfined and unfractured. Rock flow in this region is generally contained in joints fractures and other openings in bedrock. Groundwater recharge occurs by seepage of water through the soil and/or rock or by flowing directly into openings in outcropping rock. The primary source of recharge water is from precipitation that falls in the area, but can also originate from river discharge during dry periods. The movement of groundwater typically follows the original surface topography, moving from hilltops and uplands to stream valleys. The water table is generally 20 to 40 feet below the ground surface on hilltops and hillsides, but is at or near the ground surface in stream valleys and draws. In this type of geologic setting, the direction of groundwater flow can be anticipated to generally conform to that of the surface water.

Based on the ISGS topographic map of the area, the Assessment Area was located along an area with an approximate elevation of range of 950 ft msl to over 990 ft msl. Due to this topographic position, groundwater flow below the Assessment Area is difficult to estimate based on topography alone. However, based on USGS topographic maps, the likely direction of the groundwater flow would be to the west. Areas considered potentially up-gradient of the Assessment Area may be within about 990 feet east. This anticipated direction of groundwater flow was used to assist in the evaluation of potential impacts from nearby properties.

#### **5.4 Historical Use Information**

Historical research was conducted to assess the history of the H-JAIA Project Site and surrounding areas from an environmental perspective. This research included reviewing available USGS topographic maps, historic aerial photographs, Sanborn fire insurance maps, and city directories, as readily available.



#### **5.4.1 Approach**

A USGS 30-minute series quadrangle topographic map of the area entitled *Atlanta*, Georgia dated 1895 was reviewed. A USGS 30-minute series quadrangle topographic map of the area entitled *Camp Gordon*, Georgia dated 1919, was reviewed. The USGS 7.5-minute series quadrangle topographic map of the area entitled *Southwest Atlanta*, Georgia, 1954, 1968, 1973, 1983, 1993 and 1997 were reviewed.

Aerial photographs taken in 1940, 1955, 1960, 1968, 1972, 1978, 1986, 1989 and 2005 were obtained from EDR and reviewed by JWA. An aerial photograph obtained from Google Earth dated 2008 was also reviewed. Copies of the aerial photographs and topographic maps reviewed are included in Appendix C.

EDR indicated that Sanborn fire insurance maps did not exist for the Assessment Area and immediately surrounding areas. City Directories from 1997 were reviewed. A copy of the Sanborn 'no coverage' letter is included in Appendix D.

No other historic maps or photographs were readily available for review. Landfills, tank farms, or other obvious, potential hazardous substance contamination sources were not observed on the H-JAIA Project Site Assessment Area in the photographs reviewed.

#### **5.4.2 Project Site**

Due to the scale of the 1895, and 1919 topographic map, individual structures were not illustrated on the map. No indications of development on the H-JAIA Project Site were noted.

The 1940 aerial photograph showed the H-JAIA Project Site as predominantly rural land. Very few structures were observed on the H-JAIA Project Site on this photograph.



The 1955, 1960, 1968, 1972, 1978, 1986, 1989 and 2005 aerial photograph showed significant development present on the north, south, east and west sides of the H-JAIA Project Site.

The 1954, 1968, 1973, 1983, 1993 and 1997 USGS topographic map showed structures on the north, south, east and west sides of the H-JAIA Project Site. The areas surrounding the H-JAIA Project Site appeared to be largely residential and light commercial.

The City Directory did not have the H-JAIA Project Site listed for the years available.

#### **5.4.3 Adjacent Properties**

Due to the scale of the 1895 and 1919 topographic maps, individual structures were not illustrated on the map. No indications of development on the properties surrounding the H-JAIA Project Site were noted.

The 1968, 1972, 1978, 1986 and 1989 aerial photographs showed that most of the land around the H-JAIA Project Site was residential and light industrial properties. The photographs also show roads about the H-JAIA Project Site.

The City Directory did not have areas near the H-JAIA Project Site listed for the years available.

## **6.0 RECONNAISSANCE**

### **6.1 Assessment Area Reconnaissance**

John Wright, Senior Environmental Specialist and Principal of JWA, performed reconnaissance of the Assessment Area and surrounding properties on October 30, 2008.



### 6.1.1 Methodology and Limiting Conditions

The reconnaissance was conducted to look for evidence of RECs at the Assessment Area. The reconnaissance consisted of an on-site, visual inspection by a representative from JWA, and was performed by walking the entire Assessment Area including its perimeter boundaries.

An undated survey plat provided by the client, was used as a guide to locate the Assessment Area during the site reconnaissance.

### 6.1.2 Results

The results of the reconnaissance are summarized in Table 3. Additional discussion is provided following Table 3 as appropriate. Photographs of the Assessment Area are included in Appendix E.

**TABLE 3: SITE RECONNAISSANCE INFORMATION**

ITEMS	APPLIC. (Yes/No)	DISCUSSION (Blanks indicate items not observed on the Project Site)
Site Structures	Yes	There are no structures present on the Assessment Area
Roads and Access	Yes	The Assessment Area was accessed via H-JAIA Service Roads.
Water Service	Yes	Water service was reportedly available from City of Atlanta
Sewage Service	Yes	Sewage service was reportedly available from City of Atlanta
Gas	No	
Electric	Yes	Georgia Power
Cable	No	
<b><i>Interior and Exterior Observations</i></b>		
Current Use of the Property	Yes	The ±11.48 Assessment Area is vacant, well-maintained land, and contains no structures.
Past Use of the Property	Yes	The past uses of the Assessment Area were primarily for buffer purposes.
Hazardous Substances and Petroleum Products in Connection with identified uses	No	



ITEMS	APPLIC. (Yes/No)	DISCUSSION (Blanks indicate items not observed on the Project Site)
Storage Tanks	No	No above ground storage tanks (ASTs) were viewed on the Assessment Area. No features indicative of underground storage tanks (USTs), such as fill caps, vent pipes, pump islands, or associated piping were observed.
Odors	No	
Sumps and/or Pools Of Liquid or Sludge	No	
Drums	No	
Hazardous Substances and Petroleum Products Containers	No	
Other Containers	No	
Polychlorinated Biphenyls (PCBs)	No	
<b>Interiors Observations</b>		
Heating/Cooling	No	
Stains or Corrosion	No	
Drains and Sumps	No	
<b>Exterior Observations</b>		
Ponds, Pools, and/or Streams Of Liquid or Sludge	No	
Stained Soil or Pavement	No	
Stressed Vegetation	No	No stressed vegetation was observed on the Assessment Area.
Solid Waste	No	
Waste Water	No	
Wells	No	
Septic Systems	No	
<b>Other Observations</b>		
Easements	No	
Hydraulic Equipment	No	
Contracted Maintenance Services	No	

## 6.2 Surrounding Area Reconnaissance

A representative from JWA performed reconnaissance of the properties surrounding the Assessment Area on October 30, 2008.



### 6.2.1 Methodology

A foot and automobile tour of the surrounding area was conducted to assess area land use and to look for evidence of potential sources of hazardous substances on adjacent or nearby properties. The reconnaissance was performed walking along the property line of adjacent surrounding properties, and driving along the public roads.

### 6.2.2 Results

The results of the reconnaissance of surrounding properties are summarized in Table 4. Additional discussion is provided following Table 4, as appropriate. The areas immediately adjacent to the H-JAIA Project Site were primarily industrial properties. Photographs of the surrounding areas are included in Appendix E.

In the major directions, the properties were:

**North:** Light industrial aviation complex

**East:** I-75 and an additional light industrial area

**South:** Loop road and I-285

**West:** Additional runways



**TABLE 4: RESULTS OF SITE RECONNAISSANCE**

<b>ITEMS</b>	<b>APPLIC. (Yes/No)</b>	<b>DISCUSSION (Blanks indicate items not observed on nearby properties)</b>
Area Structures	Yes	There were several structures immediately north of the Assessment Area.
Area Property Use	Yes	The property use around the H-JAIA Project Site was predominantly for industrial purposes. There was a public park approximately 1.0 miles to the north of the H-JAIA Project Site.
Wells	No	
Tanks	No	No above ground storage tanks (ASTs) were viewed on the properties surrounding H-JAIA Project Site. No features indicative of underground storage tanks (USTs), such as fill caps, vent pipes, pump islands, or associated piping were observed.
Drums	No	
Other Containers	No	
Storage Areas	Yes	Storage sheds associated with the residential properties were present on the properties surrounding the H-JAIA Project Site.
Ponds and/or Pools Of Liquid or Sludge	No	

## 7.0 INTERVIEWS

Interviews were conducted with persons familiar with the H-JAIA Project Site about their knowledge of any past activities at the Project Site that might present the potential for recognized environmental conditions.

### 7.1 Process

During and following the site reconnaissance, personnel were identified to discuss in detail the history of the project site. These persons were questioned as to their knowledge of any past activities at the Project Site that might present the potential for recognized environmental conditions. Completed Interview/site check-list forms are provided in Appendix F.



## **7.2 Property Owners**

H-JAIA was listed as the contact for 9L East, the owner of Parcels (13-9-9-1 and 13-9-9-1A); being more fully described in the deed records of Clayton County.

## **7.3 Site Manager/Occupant/Local Residents**

JWA attempted to contact the residents adjacent to the H-JAIA Project Site; however no residents were available for contact at the time of reconnaissance.

## **7.4 Local Government Officials**

JWA contacted the local police and County Fire Department to request information concerning emergency responses to the H-JAIA Project Site; however no one had any relevant information about the Project Site at the time of reconnaissance.

JWA's representative spoke with a county official during a routine check of county records and that official had no knowledge of the H-JAIA Project Site. The county worker declined to be identified for this report. However, an agency scoping meeting was held on September 30, 2008 to inform the local governmental agencies of the proposed project.

## **8.0 FINDINGS**

The Assessment Area consists of ±11.48 acres of vacant industrial land. The H-JAIA Project Site, of which the Assessment Area is a part, is currently a well developed functioning international airport. The H-JAIA Project Site is immediately surrounded by light industrial and residential properties. The earliest available information (1895) indicates that the H-JAIA Project Site historically consisted of a patchwork of wooded and cleared rural land.



The H-JAIA Project Site was not listed on the Federal and State environmental database reviewed. There were eight listed regulated facilities identified within the prescribed search distances of the Assessment Area.

## 9.0 DATA GAPS

JWA conducted a review on the historical use of the H-JAIA Project Site during preparation of the Phase I Environmental Site Assessment. The historical research included sources from 1895 to present. Table 5 below summarizes the many common data failures/gaps that may be encountered during the completion of a Phase I Environmental Site Assessment. Per ASTM and AAI standards, JWA has relied on “User Provided Information” to complete this site assessment. Failure of the client to provide available information to JWA could result in a determination that “all appropriate inquiry” for this site is incomplete. Further, JWA is not responsible for any errors or omissions associated with the User Provided Information. If a significant data gap is identified in the table, a discussion of the data gap and conclusions associated with the gap will follow.



**TABLE 5: DATA FAILURES/GAPS**

Report Section	Information/Data	Data (See Descriptions Below)	Significant Data Gaps (Y/N/NA)	Additional Action(s) Required (Y/N/NA)
<b><i>Requested User Provider Information</i></b>				
4.1	Title History	Not Provided	No	No
4.2	Environmental Lien Review	Acquired	No	No
4.3	Specialized Knowledge	Client Provided	No	No
4.4	Commonly Known Information	Client Provided	No	No
4.5	Valuation Reduction for Environmental Issues	Client Provided	No	No
<b><i>Historical Use Information</i></b>				
5.4.1	Topographic Maps	Acquired	No	No
	Aerial Photographs	Acquired	No	No
5.4.3	City Directories	Acquired	No	No
5.4.4	Sanborn Fire Insurance Maps	Acquired	No	No
<b><i>Site Reconnaissance</i></b>				
6.1	Exterior Accessibility	Easily Reached	No	No
	Interior Accessibility	Easily Reached	No	No
<b><i>Area Reconnaissance</i></b>				
6.2	Accessibility	Easily Reached	No	No
<b><i>Interviews</i></b>				
7.2	Property Owner	Obtained	No	No
7.3	Site Manager/Occupants/Local Residents	Yes	No	No
7.4	Local Government Officials	Yes	No	No

JWA conducted a historical review on the past use of the H-JAIA Project Site during completion of the Phase I Environmental Assessment. The historical researches include sources from 1895 to the present. Based on the historical information that was obtained and on interviews, JWA did not identify data gaps that affected the ability of the environmental professional to render an opinion of the Assessment Area.



## **10.0 OPINION**

The H-JAIA Project Site was not listed on the Federal and State environmental databases reviewed. There were eight listed regulated facilities that were identified within the prescribed search distances of the Project Site. However, based on current conditions of the facilities, their regulatory standing, distance and topography to the Assessment Area, JWA's opinion is that, at this time, these facilities do not present REC in connection with the Assessment Area.

## **11.0 CONCLUSIONS**

JWA has performed a Phase I Environmental Site Assessment for the Assessment Area in conformance with the scope and limitations of ASTM Practice E 1527-05 and the All Appropriate Inquires Rule. This assessment has revealed no evidence of REC's in connection with the Assessment Area.

## **12.0 DEVIATIONS**

The Phase I Environmental Site Assessment was performed to substantially meet the requirements of ASTM for such investigations. JWA followed the technical requirements of the ASTM standard, revised in the year 2005.

JWA's opinions assessed issues beyond strict liability under CERCLA, or Superfund. No substantial deviations or limiting conditions to the ASTM were made, other than those listed in Section 6.1.1.



## 13.0 REFERENCES

The list of references used in this assessment is provided at the end of the document in Appendix G, in accordance with the ASTM standard. JWA's qualifications are summarized in Appendix H.



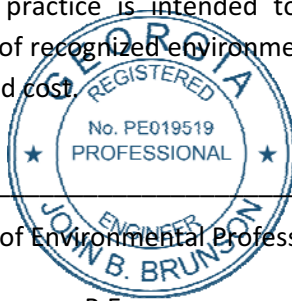
## 14.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

I declare that, to the best of my professional knowledge and belief, and based on a reasonable interpretation of the applicable regulatory language, I meet the definition of Environmental Professional defined in 40 CFR 312.10, I have the specific qualifications based on education, training, and experience to assess a property of the nature, history and setting of the Assessment Area, I have developed and performed all appropriate inquires in conformance with the standards and practices set forth in 40 CFR 312.

Notwithstanding the above, I have prepared this report in conformance with standards and practices prevailing among environmental professionals practicing in our locality, which standards and practices have governed our interpretation and application of regulatory standards, including without limitations, 40 CFR 312, This practice does not address requirements of any state or local laws, Users are cautioned that state and local laws may impose environmental assessments obligations that are beyond the scope of this practice.

Further, this report has been prepared in accordance with instructions, guidance, standards or limitations communicated to me by its initial user, as identified in the report, In the case of any conflict, apparent or actual, between regulatory standards and such user directives, I will give priority to the expressed wishes of the user.

In signing this report, I am not attesting to or certifying the accuracy of matter set forth herein (including, without limitation, the accuracy of the information received from sources such as interviews, regulatory databases, public records, photographs, maps and prospective recipients of this report). Rather, this report contains opinions and conclusions based upon my knowledge and experience applied in reasonable accordance with the prevailing industry standards as described above, No environmental assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property, Performance with this practice is intended to reduce, but cannot eliminate, uncertainty regarding the existence of recognized environmental conditions, and this practice recognizes reasonable limits of time and cost.



\_\_\_\_\_  
Signature of Environmental Professional

John B. Brunson, P.E.  
Senior Engineer  
John Wright & Associates, LLC (JWA)



## **15.0 QUALIFICATIONS**

JWA's qualifications are summarized in Appendix G. The resumes for Mr. John Wright, Senior Environmental Professional, and John B. Brunson, P.E. Chief Environmental Consultant, are also included in Appendix G.