

Phase I Environmental Site Assessment

Bibb Mill Tract

155 Coliseum Drive

Macon, Bibb County, GA

December 1, 2022

Terracon Project No. HN227508



Prepared for:

Macon-Bibb County, GA
Macon, Georgia

Prepared by:

Terracon Consultants, Inc.
Macon, Georgia

terracon.com

Terracon

Environmental



Facilities



Geotechnical



Materials



December 1, 2022

Macon-Bibb County GA
700 Poplar Street
Macon, Georgia 31204

Attn: Alex Morrison
P: (478)-955-1595
E: amorrison@maconbibb.us

Re: Phase I Environmental Site Assessment
Bibb Mill Tract
155 Coliseum Drive
Macon, Bibb County, Georgia
Terracon Project No. HN227508

Dear Mr. Morrison:

Terracon Consultants, Inc. (Terracon) is pleased to submit the enclosed Phase I Environmental Site Assessment (ESA) report for the above-referenced site. This assessment was performed in accordance with Terracon Proposal No. PHN227508 dated September 23, 2022.

We appreciate the opportunity to be of service to you on this project. In addition to Phase I services, our professionals provide geotechnical, environmental, construction materials, and facilities services on a wide variety of projects locally, regionally and nationally. For more detailed information on all of Terracon's services please visit our website at www.terracon.com. If there are any questions regarding this report or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,
Terracon Consultants, Inc.

Matthew Moore
Field Scientist

Tameka Gordon
Environmental Department Manager

Thomas E. Driver, P.E.
Regional Manager/Senior Principal
GA Reg #17394

Attachments

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EXECUTIVE SUMMARY

This Phase I Environmental Site Assessment (ESA) was performed in accordance with Terracon Proposal No. PHN227508 dated September 23, 2022 and was conducted consistent with the procedures included in ASTM E1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. The ESA was conducted under the supervision or responsible charge of Tameka Gordon, Environmental Professional. Matthew Moore performed the site reconnaissance on October 21, 2022.

Findings and Opinions

A summary of findings is provided below. It should be recognized that details were not included or fully developed in this section, and the report must be read in its entirety for a comprehensive understanding of the items contained herein.

Site Description and Use

The site is approximately 23.06 acres of land comprised from six tax parcels; R074-0214, R074-0220, R074-0221, R0740-0222, and R074-0224; in Macon, Bibb County, Georgia. The site is comprised of a vacant approximately 40,288 square foot (sf) storage warehouse building in the central portion of the site, asphalt paved parking areas throughout the site, Lake City Street traversing the central portion of the site, and undeveloped wooded land in the eastern portion of the site. Construction debris piles, the location of a recently burned four-story approximately 22,000 sf building, were located on the southwestern portion of the property. The site is formerly part of the Bibb Manufacturing Company Mill.

Historical Information

Based on review of available historical documents, the site has consisted of residential structures in the eastern portion of the site and the Bibb Manufacturing Company, Cotton Mill No. 1 occupying the remaining portions of the site as early as 1889 to 1958. The site remained relatively unchanged until 1981 when all residential structures onsite were removed. Parts of the cotton mill were removed from the western portion of the site in 2007. The structure in the southern portion of the site was destroyed in a fire and demolished in March of 2022. The site has remained unchanged since that time. The eastern portion of the property was vacant and/or wooded land in 1924 to the present. Lake City and Flanders roads, which have since changed to Lake City Street, traversed the central portion of the site from 1908 to the present.

The surrounding properties have historically consisted of residential and undeveloped properties as early as 1889. Railroad tracks followed by wooded land was observed south of the site in 1924 to the present. Interstate 16 (I-16) was constructed southwest of the site in 1972 to the present. The land to the west was observed to be what is now Coliseum Drive followed by scattered residential structures as early as the 1889. The residential structures were cleared and the Macon Coliseum was developed in 1968. A building was added to the Macon Coliseum in 1999 and

remained unchanged until the present. Residential structures are north of the site as early as 1889. A commercial structure was developed north of the site in 1924. The land to the north remained a mixture of commercial and residential structures from 1968 to the present. The land to the east was vacant and partially wooded land as early as the 1924 and remained unchanged until the present.

Records Review

Selected federal and state environmental regulatory databases as well as responses from state and local regulatory agencies were reviewed. The site is listed on the following databases: Recovered Georgia Leaking Underground Storage Tank (RGA LUST), Leaking Underground Storage Tank (LUST), Underground Storage Tank (UST), Aboveground Storage Tank (AST), Emergency Response Notification System (ERNS), US Brownfields, and Georgia Non-Hazardous Site Inventory (GA NON-HSI) databases.

The site is listed under facility name Bibb Yarns Inc Coliseum Plant, in the RGA LUST, LUST, UST, and Financial Assurance databases. The UST listing is due to three, 30,000-gallon USTs containing No. 6 fuel oil that formerly operated at the site between 1968 and 1993, when the USTs were closed in place. One 3,000-gallon gasoline fuel UST that formerly operated at the site between 1967 and 1993, when the UST was closed by removal and one 2,000-gallon diesel UST that formerly operated at the site between 1961 and 1993, when the UST was closed by removal. Based on review of regulatory information, the tanks that were closed in-place to avoid undermining the building's foundation are located in the southeast area (Area 1) of the plant and the tanks that were removed were located northwest (Area 2) of the plant. These approximate areas are shown in Exhibit 3 in the Appendix A.

The regulatory information available included an UST Closure Summary and Groundwater Assessment completed by Atlanta Environmental Management Inc. (AEM) dated August 23, 1993. The groundwater assessment, completed by AEM, involved the installation of five permanent and four temporary monitoring wells. Soil and groundwater samples were collected and analyzed for Total Petroleum Hydrocarbons (TPH), Benzene, Toluene, Ethylbenzene and Xylene (BTEX), Semi Volatile Organic Compounds (SVOC).

Area 1: The three No. 6 fuel oil tanks in Area 1 were closed in place on July 2, 1993. During the closure, contaminated soil was removed around the UST's to a depth of 13.5 feet, just above the top of the groundwater table, and a total of about 350 tons of contaminated soil was removed. The consultant stated in the Closure Report that, since the UST's were closed in place, contaminated soil has likely been left on site. The consultant estimated about 140 cy of contaminated soil has been left in place below the tanks and building. Groundwater monitoring wells installed in Area 1. Two of the wells indicated groundwater contamination above the detection limits, but no groundwater contamination above State of Georgia maximum contaminant levels (MCLs).

Area 2: One 2,000-gallon diesel and one 3,000-gallon gasoline UST was removed around July 2, 1993. During the removal, contaminated soil was removed to a depth of approximately 14.5

feet, just above the top of the groundwater table. According to the consultant, soil removal was continued until clean margins were met or until the water table or underground utilities prevented further excavation. Therefore, it is believed that some contaminated soils remained in place after removal.

Groundwater samples collected contained a concentration of 6 parts per billion (ppb) benzene, which is above the maximum concentration level (MCL) of 5 ppb for the State of Georgia. According to the consultant, since groundwater flow in Area 2 is southwesterly directly toward the Ocmulgee River and all known private and public wells are south of the Ocmulgee River, which is between the wells and the Bibb facility, groundwater would be intercepted by the Ocmulgee River prior to reaching any downgradient wells. Therefore, it is unlikely it would impact wells on the opposite side. In addition, due to the low concentration (6 ppb) of benzene in the groundwater at the site, in-stream maximum allowable concentrations (71.28 ppb) would not be exceeded. Based on the analytical results, AEM recommended no further action in both areas.

Additional assessment activities were conducted in Area 2 at the site in October 1993 using properly constructed wells. Based on analytical data, there is slight groundwater contamination (8 ppb benzene) in the immediate area of the former UST pit of the Bibb Yarns facility. However, AEM concluded that no further action is necessary since there are no receptors downgradient of the former UST pit, concentrations are very low, the source of contamination has been removed, and contaminated soil was excavated around the USTs to the state's stringent target cleanup level of 100 ppm TPH. On February 11, 1994, a No Further Corrective Action Required (NFCAR) letter was issued by the regulatory agency for both tank areas.

The past use of USTs at the site, as well as the confirmed soil and groundwater contamination (even with the NFCAR from EPD) constitutes a historical recognized environmental condition (HREC) associated with the site. Refer to Section 4.1 for further details.

Numerous off-site facilities are listed in the environmental regulatory database report.

The Bibb Co Truck Shop, currently the office of the Georgia Secretary of State, was observed to be approximately 45 feet north and topographically up-gradient in relation to the site located at 237 Coliseum Drive. Based on a review of regulatory information, the facility formerly operated with registered USTs. Three USTs were reportedly installed at the facility between 1970 and 1989. According to the reviewed database report, the USTs were removed from the ground at an unknown date. The regulatory information available did not include a UST Closure Report documenting soil and/or groundwater sampling at the time of removal. Because the documents reviewed did not include a UST Closure Report, there is potential for impairment to exist in the facility subsurface as a result of historical UST operations, which constitutes a REC for the site.

This REC was evaluated during a Phase II LSI performed by Resolute and no groundwater contamination was noted.

Previous Environmental Reports

Terracon requested the client provide any previous environmental reports they are aware of for the site. The client provided a Phase I Environmental Site Assessment Report for the site, as well as the Macon-Bibb County EPA Community Wide Brownfield Assessment Program report. The Bibb Mill was included in the report as a property of interest for the Brownfields program. Details are further discussed below.

- Phase I Environmental Site Assessment
Former Bibb Mill Properties
201 & 155 Coliseum Drive
Macon, Bibb County, Georgia
Dated: March 2017
Prepared by: United Consulting

The following summarized general information discovered during Resolute's Phase I ESA.

- Pile of broken Fluorescent Light Bulbs which may be a potential source of mercury soil contamination.
- The former locations of at least five underground storage tanks, five of which were abandoned in place. (We note that the detailed information regarding the UST closures was not reviewed during the ESA).
- A number of historic automotive repair shops/filling stations and dry-cleaning operations located in the immediate vicinity of the site.
- Historic site operations located in the areas of the facility building where petroleum or chemicals were likely used. Based on their review of the Sanborn maps, these areas/features include machine shops, polishing room, engine rooms, dyeing, and a waste house.

Based on the findings of findings present in the Phase I ESA report, Resolute recommended that further investigation is warranted to eliminate or limit future impacts and verify that the site has been adequately characterized.

- Macon-Bibb County EPA Community Wide Brownfield Assessment Program
Macon, Macon-Bibb County, Georgia
Dated: October 31, 2018
Submitted by: Julie Moore from Macon-Bibb County with assistance from Resolute Environmental & Water Resources.

The following summarized general information was discovered during the EPA Community Wide Brownfield Assessment Program.

- Resolute Environmental & Water Resources conducted a Phase II Environmental Site Assessment including eleven soil borings and the installation and sampling of six permanent monitoring wells.
- The findings of the Phase II revealed impacted soil at the site exceeding action levels, with benzene and 4-chloroaniline about Georgia EPD Hazardous Site Response Act (HSRA) Notification Criteria (NC). There were no groundwater contamination exceedances in the groundwater samples collected.
- Recommendations of the Phase II ESA were that the site be reported to the EPD Hazardous Site Response Program and that additional sampling be performed if the site is considered for the Brownfields Program.
- The HSRA Release Notification was made by Resolute in a report dated September 5, 2017.
- A HSRA Release Notification from Environmental Protection Division dated October 5, 2017. The letter states EPD has no reason to believe that a release exceeding a reportable quantity has occurred at this property. Therefore, the site was not listed on the HSI listing.

Copies of Resolute Environmental & Water Resources Phase I ESA and the EPA Community Wide Brownfield Assessment Program, which includes the Phase II LSI and the HSRA Notification Report, are included in Appendix H.

Site Reconnaissance

At the time of Terracon's reconnaissance, the site was comprised of a vacant warehouse building, associated with the former mill; paved parking areas; Lake City Street; and developed and wooded land. Piles of construction debris, due to a recent fire of a former mill building, was located on the southern portion of the property. Based upon visual observation of surface materials only, this area appeared to consist primarily of brick and wood and did not appear to be hazardous in nature. This area is accessed by Lake City Street from Coliseum Drive. Leakage, spills or other releases from these materials were not observed during the visual reconnaissance.

Terracon observed four permanent monitoring wells and a sewer easement throughout the site. Three of the monitoring wells installed at the site for environmental studies were located and found to be in good condition while a fourth was damaged. According to Macon-Bibb EPA Community Wide Brownfield Assessment Program, six permanent monitoring wells were installed during Resolute Environmental & Water Resources' Environmental Site Assessment. The results of the groundwater sampling showed results below action levels. Four of the six wells were observed on site during our site reconnaissance. The permanent monitoring wells do not constitute RECs to the site but should be properly abandoned prior to site development.

Two empty, large (>20,000 gallons) aboveground storage tanks (ASTs) were observed on the central portion of the property. It is our understanding that the current owner will remove these tanks.

A drainage ditch was located in the wooded area of the property in the west. A sheen was observed on the surface of the water; however, no noxious odors were noted emanating from within the drainage ditch at the time of the site reconnaissance. There were no signs of petroleum contamination evident. Scattered trash was observed throughout the property. Approximately ten PCV pipes leading into the ground are located throughout the property. It is Terracon's professional opinion that the pipes are likely associated with a utility system. A sealed, 55-gallon drum was observed in the warehouse. Five pole-mounted transformers were observed throughout the site. Leakage, spills or other releases from these materials were not observed during the visual reconnaissance. The debris materials did not appear to be hazardous in nature; however, they should be removed and disposed in accordance with local and state regulations. Based on site observations, RECs associated with the site were identified. The historical industrial operations conducted at the site is considered a REC.

Adjoining Properties

The adjoining properties generally consist of the following: Georgia Secretary of State Office and residential structures to the north; railroad tracks followed by wooded land and the Ocmulgee Mounds National Historical Park to the east; Interstate 16 followed by the Ocmulgee River to the south; Coliseum Drive followed by the Macon Coliseum to the west. The Georgia Secretary of State's Office constitutes a REC to the site due to former UST operations. This REC was evaluated during a Phase II LSI performed by Resolute and no groundwater contamination was noted. None of the other surrounding property operations constitute RECs associated with the site.

Significant Data Gaps

Significant Data Gaps were not identified.

Conclusions

We have performed a Phase I ESA consistent with the procedures included in ASTM Practice E1527-13 at 155 and 201 Coliseum Drive, Macon, Bibb County, Georgia, the site. The following RECs and HREC were identified in connection with the site:

- There is potential for impairment to exist in the site subsurface as a result of the historical industrial operation conducted at the site from the late 1800s to 2000. This constitutes a REC. These potential impacts have been evaluated through the performance of the Phase II LSI performed by Resolute Environmental and through the HSRA notification process.
- The past use of USTs at the site constitutes a HREC associated with the site. Although a NFCAR letter was issued by EPD, soil contamination remains below the closed in place UST's as well as below the removed UST's at the site. Site development in these areas may encounter soil and possibly groundwater contamination.

Phase I Environmental Site Assessment

Bibb Mill Tract ■ Macon, GA

December 1, 2022 ■ Terracon Project No. HN227508



- There is potential for impairment to exist in the site's subsurface as a result of the adjoining former UST operations north of the site. These potential impacts have been evaluated through the performance of the Phase II LSI performed by Resolute Environmental and no groundwater contamination was encountered.

- The property can be susceptible to potential vapor intrusion during ground disturbance and construction activities. Vapor testing should be conducted to ensure a preferential pathway for vapor intrusion is not created within the proposed buildings during construction.

1.0 INTRODUCTION

1.1 Site Description

Site Name	Bibb Mill Tract
Site Location/Address	155 and 201 Coliseum Drive, Macon, Bibb County, Georgia
Land Area	Approximately 23.06 acres
Site Improvements	One vacant warehouse, paved parking areas, Lake City Street
Anticipated Future Site Use	Mixed use Development
Reason for the ESA	Acquisition

The location of the site is depicted on Exhibit 1 of Appendix A, which was reproduced from a portion of the USGS 7.5-minute series topographic map. The site and adjoining properties are depicted on the Site Diagram, which is included as Exhibit 2 of Appendix A. Acronyms and terms used in this report are described in Appendix F.

1.2 Scope of Services

This Phase I ESA was performed in accordance with Terracon Proposal No. PHN227508, dated September 23, 2022, and was conducted consistent with the procedures included in ASTM E1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property*. The purpose of this ESA was to assist the client in developing information to identify RECs in connection with the site as reflected by the scope of this report. This purpose was undertaken through user-provided information, a regulatory database review, historical and physical records review, interviews, including local government inquiries, as applicable, and a visual noninvasive reconnaissance of the site and adjoining properties. Limitations, ASTM deviations, and significant data gaps (if identified) are noted in the applicable sections of the report.

ASTM E1527-13 includes the definition of "migrate/migration," which refers to "the movement of hazardous substances or petroleum products in any form, including, for example, solid and liquid at the surface or subsurface, and vapor in the subsurface." By including this explicit reference to migration in ASTM E1527-13, the Standard clarifies that the potential for vapor migration should be addressed as part of a Phase I ESA. This Phase I ESA has considered vapor migration in evaluation of RECs associated with the site.

1.3 Standard of Care

This ESA was performed in accordance with generally accepted practices of this profession, undertaken in similar studies at the same time and in the same geographical area. We have endeavored to meet this standard of care, but may be limited by conditions encountered during

performance, a client-driven scope of work, or inability to review information not received by the report date. Where appropriate, these limitations are discussed in the text of the report, and an evaluation of their significance with respect to our findings has been conducted.

Phase I ESAs, such as the one performed at this site, are of limited scope, are noninvasive, and cannot eliminate the potential that hazardous, toxic, or petroleum substances are present or have been released at the site beyond what is identified by the limited scope of this ESA. In conducting the limited scope of services described herein, certain sources of information and public records were not reviewed. It should be recognized that environmental concerns may be documented in public records that were not reviewed. No ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs. No warranties, express or implied, are intended or made. The limitations herein must be considered when the user of this report formulates opinions as to risks associated with the site or otherwise uses the report for any other purpose. These risks may be further evaluated – but not eliminated – through additional research or assessment. We will, upon request, advise you of additional research or assessment options that may be available and associated costs.

1.4 Additional Scope Limitations, ASTM Deviations and Data Gaps

Based upon the agreed-on scope of services, this ESA did not include subsurface or other invasive assessments, vapor intrusion assessments or indoor air quality assessments (i.e. evaluation of the presence of vapors within a building structure), business environmental risk evaluations, or other services not particularly identified and discussed herein. Credentials of the company (Statement of Qualifications) have not been included in this report but are available upon request. Pertinent documents are referred to in the text of this report, and a separate reference section has not been included. Reasonable attempts were made to obtain information within the scope and time constraints set forth by the client; however, in some instances, information requested is not, or was not, received by the issuance date of the report. Information obtained for this ESA was received from several sources that we believe to be reliable; nonetheless, the authenticity or reliability of these sources cannot and is not warranted hereunder. This ESA was further limited by the following:

- Terracon attempted to contact the Bibb County Fire Department and Bibb County Environmental Health Department regarding records of environmental concern associated with the site. At the time of this report, a response has not been received. Based on the historical nature of the site and the reported use of the property, the lack of this information is not likely to alter the conclusions of this report and does not constitute a significant data gap.

An evaluation of the significance of limitations and missing information with respect to our findings has been conducted, and where appropriate, significant data gaps are identified and discussed in the text of the report. However, it should be recognized that an evaluation of significant data gaps is based on the information available at the time of report issuance, and an evaluation of

information received after the report issuance date may result in an alteration of our conclusions, recommendations, or opinions. We have no obligation to provide information obtained or discovered by us after the issuance date of the report, or to perform any additional services, regardless of whether the information would affect any conclusions, recommendations, or opinions in the report. This disclaimer specifically applies to any information that has not been provided by the client.

This report represents our service to you as of the report date and constitutes our final document; its text may not be altered after final issuance. Findings in this report are based upon the site's current utilization, information derived from the most recent reconnaissance and from other activities described herein; such information is subject to change. Certain indicators of the presence of hazardous substances or petroleum products may have been latent, inaccessible, unobservable, or not present during the most recent reconnaissance and may subsequently become observable (such as after site renovation or development). Further, these services are not to be construed as legal interpretation or advice.

1.5 Reliance

This ESA report is prepared for the exclusive use and reliance of Macon-Bibb County, GA. Use or reliance by any other party is prohibited without the written authorization of Macon-Bibb County, GA and Terracon Consultants, Inc. (Terracon).

Reliance on the ESA by the client and all authorized parties will be subject to the terms, conditions and limitations stated in the proposal, ESA report, and Terracon's Agreement. The limitation of liability defined in the Agreement is the aggregate limit of Terracon's liability to the client and all relying parties.

Continued viability of this report is subject to ASTM E1527-13 Sections 4.6 and 4.8. If the ESA will be used by a different user (third party) than the user for whom the ESA was originally prepared, the third party must also satisfy the user's responsibilities in Section 6 of ASTM E1527-13.

1.6 Client Provided Information

Prior to the site visit, Alex Morrison, Director of Planning and Public Spaces from Macon-Bibb County, GA, was asked to provide the following user questionnaire information as described in ASTM E1527-13 Section 6.

Client Questionnaire Responses

Client Questionnaire Item	Client Did Not Respond	Client's Response	
		Yes	No
Specialized Knowledge or Experience that is material to a REC in connection with the site.	X		
Actual Knowledge of Environmental Liens or Activity Use Limitations (AULs) that may encumber the site.	X		
Actual Knowledge of a Lower Purchase Price because contamination is known or believed to be present at the site.			X
Commonly Known or Reasonably Ascertainable Information that is material to a REC in connection with the site.		X	
Obvious Indicators of Contamination at the site.		X	

Terracon’s consideration of the client provided information did not identify RECs. However, based on the total tenure of industrial operations of at least 120 years at the site, the industrial operations conducted at the site constitute a REC associated with the site. A copy of the questionnaire is included in Appendix D.

2.0 PHYSICAL SETTING

Physical Setting Information		Source
Topography		
Site Elevation	Approximately 300 feet above sea level.	USGS Topographic Map, Macon East, GA 2020 (Appendix A)
Topographic Gradient	Gently sloping towards the southeast	
Closest Surface Water	Drainage stream located on the eastern portion of the property. The Ocmulgee River is approximately 1000 feet south of the property.	
Soil Characteristics		
Soil Type	Orangeburg	Environmental Data Resources (EDR) Physical Setting Summary
Description	Orangeburg: Moderate infiltration rates. Deep and Moderately deep, moderately well and well drained soils with moderately coarse textures.	
Geology/Hydrogeology		
Formation	Mesozoic	EDR Physical Setting Summary

Physical Setting Information		Source
Description	Cretaceous	
Estimated Depth to First Occurrence of Groundwater	Greater than 10 feet below grade surface (bgs).	USGS Topographic Map East Macon, GA 2020 (Appendix A)
Hydrogeologic Gradient	According to previous studies with monitoring wells, the hydrogeologic gradient is generally to the southwest toward the Ocmulgee River.	

3.0 HISTORICAL USE INFORMATION

Terracon reviewed the following historical sources to develop a history of the previous uses of the site and surrounding area, in order to help identify RECs associated with past uses. Copies of selected historical documents are included in Appendix C.

3.1 Historical Topographic Maps, Aerial Photographs, and Sanborn Maps

Readily available historical USGS topographic maps, selected historical aerial photographs (at approximately 10-to-15-year intervals) and historical fire insurance maps produced by the Sanborn Map Company were reviewed to evaluate land development and obtain information concerning the history of development on and near the site. Reviewed historical topographic maps aerial photographs, and Sanborn maps are summarized below.

- Topographic map: Macon West, GA: 1956 (aerial photo revised 1954), 1972 (aerial photo revised in 1972), 1985 (aerial photo revised in 1981), 2014, 2017, 2020 (1:24,000); Macon East, GA: 1956 (aerial photo revised 1954), 1972 (aerial photo revised in 1972), 1985 (aerial photo revised in 1981), 2014, 2017, 2020 (1:24,000).
- Aerial photograph: EDR 1955, 1958, 1966, 1972, 1981, 1988, 1993, 1999, 2007, 2010, 2013 and 2017 (1" = 500')
- Sanborn map: EDR 1889, 1895, 1908, 1924, 1951, 1960, and 1968

Historical Maps, Aerial Photographs, and Sanborn Maps

Direction	Description
Site	<u>Bibb Manufacturing Company, Cotton Mill No.1</u> and residential structures with undeveloped wooded land in the western portion of the property (1889-1924); <u>Bibb Manufacturing Company, Cotton Mill No.1</u> was improved with structures and a Gas Tank can be observed on the Sanborn Map (1951-1972). Residential structures were removed from the site (1981-1999). Parts of the mill were removed from the property (2007-2019).

Direction	Description
North	Residential structures (1889-1908). <u>Bibb Manufacturing Company, Cotton Mill No.1</u> , (current Georgia Secretary of State's Office), commercial and residential properties were constructed as followed by residential structures, three gas tanks in main street can be observed in the Sanborn map (1924) <u>Bibb Manufacturing Company, Cotton Mill No.1</u> (current Georgia Secretary of State's Office) with residential and commercial structures (1951-2017). The Georgia Secretary of State's Office followed by residential structures (2019).
East	Railroad tracks followed by undeveloped wooded land (1955-2013). Railroad tracks followed by the apparent Ocmulgee Mounds National Historical Park (2017-2019).
South	Undeveloped land followed by the Ocmulgee River (1955-1966) Interstate 16 followed by The Ocmulgee River (1972-1999). An apparent medical building followed by Interstate 16 and The Ocmulgee River (2007-2019).
West	Main Street followed by residential structures and observed filling station (1889-1960). Apparent Coliseum Drive followed by the Macon Coliseum (1966-2019).

Bibb Manufacturing Company, Cotton Mill No.1

Refer to Section 4.1 for further details.

3.2 City Directories

The city directories used in this study were made available through EDR (selected years reviewed: 1964 through 2017) and were reviewed at approximate five-year intervals, if readily available. Street listings were not available prior to 1964. The current street address for the site was identified as 155 and 201 Coliseum Drive.

Direction	Description
Site	155 Coliseum Drive: <u>Bibb Manufacturing Company No.1</u> (1970-1975), No listings (1980-2017)
North	237 Coliseum Drive: No Listings (1970), <u>The Bibb Co</u> (1975-1990), Bibb Company the Corporate Office (2000), Georgia Secretary of State (2005-2017)
East	No addresses listed
South	No addresses listed
West	200 Coliseum Drive: Macon Coliseum (1970-2017)

The site and northern property are discussed further in Section 4.1.

3.3 Site Ownership

Based on a review of information obtained from the Bibb County assessor's records, there are two owners of the property (Due South Investments, LLC and Wanda Barrs). Due South Investments, LLC, purchased parcels R074-0214, R074-0220, R074-0222, and R074-0224 on

February 10, 1997, and Parcel R074-0217 on December 17, 2022. Wanda Barrs purchased parcel R074-0221 on October 12, 2011. Both entities are related.

3.4 Title Search

At the direction of the client, a title search was/was not included as part of the scope of services. Unless notified otherwise, we assume that the client is evaluating this information outside the scope of this report.

3.5 Environmental Liens and Activity and Use Limitations

The EDR regulatory database report included a review of both Federal and State Engineering Control (EC) and Institutional Control (IC) databases. Based on a review of the database report, the site was not listed on the EC or IC databases. Please note that in addition to these federal and state listings, AULs can be recorded at the county and municipal level that may not be listed in the regulatory database report. Environmental lien and activity and use limitation records recorded against the site were not provided by the client. At the direction of the client, performance of a review of these records was not included as part of the scope of services and unless notified otherwise, we assume that the client is evaluating this information outside the scope of this report.

3.6 Interviews Regarding Current and Historical Site Uses

The following individual was interviewed regarding the current and historical use of the site.

Interview

Interviewer	Name / Phone #	Title	Date
Matthew Moore	Alex Morrison 478-955-1595	Representative from Macon-Bibb County	October 24, 2022

An ASTM E1527-13 User Questionnaire was completed by Mr. Alex Morrison. A copy of the completed questionnaire is included in Appendix D.

He indicated that the site is located off 155, 201, and 211 Coliseum Drive; 620 and 630 Coliseum Place; and 280 Clinton Street in Macon, GA. Mr. Morrison indicated that he knew the following:

- The reason for conducting the ESA is for acquisition, and
- The anticipated future use of the site is for mixed used development.

He did not provide or indicate whether he knew the following related to the subject property:

- Current facility operations,
- Prior owners,

- Prior occupants,
- Access restrictions,
- Notifications of special requirements regarding confidentiality, or
- Chain of title with grantor/grantee summary (back to 1940 or first development use).

He did not provide or indicate whether the following documents existed related to the subject property:

- Environmental Site Assessment reports,
- Environmental Compliance Audit reports,
- Geotechnical studies,
- Reports regarding hydrogeologic conditions on the property or surrounding area,
- Registrations for above or underground storage tanks,
- Notices or other correspondence from any governmental agency related to past or current violations of environmental laws with respect to the property or relating to environmental liens encumbering the property,
- Registrations for underground injection systems, or
- Environmental permits/plans, solid waste permits, hazardous waste disposal permits, wastewater permits, NPDES permits, underground injection permits, SPCC Plans.

3.7 Prior Report Review

Terracon requested the client provide any previous environmental reports they are aware of for the site. The client provided a Phase I Environmental Site Assessment Report for the site, as well as the Macon-Bibb County EPA Community Wide Brownfield Assessment Program report. The Bibb Mill was included in the report as a property of interest for the Brownfields program. Details are further discussed below.

- Phase I Environmental Site Assessment
Former Bibb Mill Properties
201 & 155 Coliseum Drive
Macon, Bibb County, Georgia
Dated: March 2017
Prepared by: United Consulting

The following summarized general information discovered during Resolute's Phase I ESA.

- Pile of broken Fluorescent Light Bulbs which may be a potential source of mercury soil contamination.
- The former locations of at least five underground storage tanks, five of which were abandoned in place. (We note that the detailed information regarding the UST closures was not reviewed during the ESA).

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- A number of historic automotive repair shops/filling stations and dry-cleaning operations located in the immediate vicinity of the site.
- Historic site operations located in the areas of the facility building where petroleum or chemicals were likely used. Based on their review of the Sanborn maps, these areas/features include machine shops, polishing room, engine rooms, dyeing, and a waste house.

Based on the findings of findings present in the Phase I ESA report, Resolute recommended that further investigation is warranted to eliminate or limit future impacts and verify that the site has been adequately characterized.

- Macon-Bibb County EPA Community Wide Brownfield Assessment Program
Macon, Macon-Bibb County, Georgia
Dated: October 31, 2018
Submitted by: Julie Moore from Macon-Bibb County with assistance from Resolute Environmental & Water Resources.

The following summarized general information was discovered during the EPA Community Wide Brownfield Assessment Program.

- Resolute Environmental & Water Resources conducted a Phase II Environmental Site Assessment including eleven soil borings and the installation and sampling of six permanent monitoring wells.
- The findings of the Phase II revealed impacted soil at the site exceeding action levels, with benzene and 4-chloroaniline about Georgia EPD Hazardous Site Response Act (HSRA) Notification Criteria (NC). There were no groundwater contamination exceedances in the groundwater samples collected.
- Recommendations of the Phase II ESA were that the site be reported to the EPD Hazardous Site Response Program and that additional sampling be performed if the site is considered for the Brownfields Program.
- The HSRA Release Notification was made by Resolute in a report dated September 5, 2017.
- A HSRA Release Notification from Environmental Protection Division dated October 5, 2017. The letter states EPD has no reason to believe that a release exceeding a reportable quantity has occurred at this property. Therefore, the site was not listed on the HSI listing.

Copies of Resolute Environmental & Water Resources Phase I ESA and the EPA Community Wide Brownfield Assessment Program, which includes the Phase II LSI and the HSRA Notification Report, are included in Appendix H.

4.0 RECORDS REVIEW

Regulatory database information was provided by EDR, a contract information services company. The purpose of the records review was to identify RECs in connection with the site. Information in this section is subject to the accuracy of the data provided by the information services company and the date at which the information is updated. The scope herein did not include confirmation of facilities listed as "unmappable" by regulatory databases.

In some of the following subsections, the words up-gradient, cross-gradient and down-gradient refer to the topographic gradient in relation to the site. As stated previously, Resolute Environmental & Water Resources Consulting installed 6 permanent monitoring wells. The findings from the groundwater monitoring shows the groundwater flow direction is to the southwest to The Ocmulgee River. The depth to shallow groundwater was not stated in Resolute's Phase II, however it would likely vary depending upon seasonal variations in rainfall and the depth to the soil/bedrock interface.

4.1 Federal and State/Tribal Databases

Listed below are the facility listings identified on federal and state/tribal databases within the ASTM-required search distances from the approximate site boundaries. Database definition, descriptions, and the database search report are included in Appendix D.

Federal Databases

Database	Description	Distance (miles)	Listings
CERCLIS	Comprehensive Environmental Response, Compensation, & Liability Information System	0.5	0
CERCLIS / NFRAP	Comprehensive Environmental Response, Compensation, & Liability Information System/No Further Remedial Action Planned	0.5	0
ERNS	Emergency Response Notification System	Site	1
IC / EC	Institutional Control/Engineering Control	Site	0
NPL	National Priorities List	1	0
NPL (Delisted)	National Priorities Delisted List	0.5	0
RCRA CORRACTS/ TSD	RCRA Corrective Action Activity	1	0
RCRA Generators	Resource Conservation and Recovery Act	Site and adjoining properties	1
RCRA Non-CORRACTS/ TSD	RCRA Non-Corrective Action Activity	0.5	0

State/Tribal Databases

Database	Description	Distance (miles)	Listings
Brownfields	Brownfields Public Records List	0.5	4
IC	Institutional Controls	Site	0
LUST	Leaking Underground Storage Tanks	0.5	13
SHWS	State Hazardous Waste Site	0.5	1
SWF/LF	Solid Waste Disposal Facilities/Landfills	0.5	1
UST	Underground Storage Tanks	Site and adjoining properties	1

In addition to the above ASTM-required listings, Terracon reviewed other federal, state, local, and proprietary databases provided by the database firm. A list of the additional reviewed databases is included in the regulatory database report included in Appendix D.

The following table summarizes the site-specific information provided by the database and/or gathered by this office for select identified facilities within 500 feet of the site. Facilities are listed in order of proximity to the site. Additional discussion for selected facilities follows the summary table.

Listed Facilities

Facility Name and Location	Estimated Distance / Direction/Gradient	Database Listings	Is a REC, CREC, or HREC to the Site
Bibb Yarns Inc, 155 Coliseum Drive	Site	RGA LUST, LUST, UST, ERNS	Yes, HREC
The Bibb Mill 155 Coliseum Drive		US BROWNFIELDS, GA NON-HSI, UST	
The Bibb Co Truck Shop 237 Coliseum Drive	95 feet / North / upgradient	UST	Yes, REC
Scarborough Dan W Fill Station 315 Main Street	410 feet / North / upgradient	EDR Hist Auto	Yes
Ackermans Wrecker Service 315 Main Street	410 feet / North / upgradient	UST	No
A J Stalworth 316 Main Street	410 feet / North / upgradient	EDR Hist Cleaner	No
Lang Chas M Auto 308 Main Street		EDR Hist Auto	No

Facility Name and Location	Estimated Distance / Direction/Gradient	Database Listings	Is a REC, CREC, or HREC to the Site
308 14 Taylors Ed Auto Repair 308 Main Street	410 feet / North / upgradient	GA NON-HSI	No
280 Red Star Filling Station 282 Main Street	410 feet / North / upgradient	EDR Hist Auto	No
Texas Filling Station 280 Main Street	410 feet / North / upgradient	EDR Hist Auto	No
East Side Service Station 280 Main Street	410 feet / North / upgradient	EDR Hist Auto	No
Loews Service and Filling Station 250 Main Street	410 feet / North / upgradient	EDR Hist Auto	No
Sol Sanford Cldo 246 Main Street	410 feet / North / upgradient	EDR Hist Cleaner	No
Independent Laundry Co 322 Main Street	410 feet / North / upgradient	EDR Hist Cleaner	No
Klean Kleaners Br 322 Main Street	410 feet / North / upgradient	EDR Hist Cleaner	No

Terracon assessed the listed sites for potential environmental impacts to the site using the following criteria: (1) relative distance between the site and the regulated site, (2) topographic features and proximity of the site to the regulated site; Terracon follows the generally accepted premise that shallow groundwater flow direction can be reasonably expected to mimic surface topography, and (3) common inferences about the nature and relevance of the regulatory listing with regard to the site.

The site is listed under facility name Bibb Yarns Inc Coliseum Plant, in the RGA LUST, LUST, UST, and Financial Assurance databases. The UST listing is due to three, 30,000-gallon USTs containing No. 6 fuel oil that formerly operated at the site between 1968 and 1993, when the USTs were closed in place. One 3,000-gallon gasoline fuel UST that formerly operated at the site between 1967 and 1993, when the UST was closed by removal and one 2,000-gallon diesel UST that formerly operated at the site between 1961 and 1993, when the UST was closed by removal. Based on review of regulatory information, the tanks that were closed in-place to avoid undermining the building’s foundation are located in the southeast area (Area 1) of the plant and the tanks that were removed were located northwest (Area 2) of the plant. These approximate areas are shown in Exhibit 3 in the Appendix A.

The regulatory information available included an UST Closure Summary and Groundwater Assessment completed by Atlanta Environmental Management Inc. (AEM) dated August 23, 1993. The groundwater assessment, completed by AEM, involved the installation of five

permanent and four temporary monitoring wells. Soil and groundwater samples were collected and analyzed for Total Petroleum Hydrocarbons (TPH), Benzene, Toluene, Ethylbenzene and Xylene (BTEX), Semi Volatile Organic Compounds (SVOC).

Area 1: The three No. 6 fuel oil tanks in Area 1 were closed in place on July 2, 1993. During the closure, contaminated soil was removed around the UST's to a depth of 13.5 feet, just above the top of the groundwater table, and a total of about 350 tons of contaminated soil was removed. The consultant stated in the Closure Report that, since the UST's were closed in place, contaminated soil has likely been left on site. The consultant estimated about 140 cy of contaminated soil has been left in place below the tanks and building. Groundwater monitoring wells installed in Area 1. Two of the wells indicated groundwater contamination above the detection limits, but no groundwater contamination above State of Georgia maximum contaminant levels (MCLs).

Area 2: One 2,000-gallon diesel and one 3,000-gallon gasoline UST was removed around July 2, 1993. During the removal, contaminated soil was removed to a depth of approximately 14.5 feet, just above the top of the groundwater table. According to the consultant, soil removal was continued until clean margins were met or until the water table or underground utilities prevented further excavation. Therefore, it is believed that some contaminated soils remained in place after removal.

Groundwater samples collected contained a concentration of 6 parts per billion (ppb) benzene, which is above the maximum concentration level (MCL) of 5 ppb for the State of Georgia. According to the consultant, since groundwater flow in Area 2 is southwesterly directly toward the Ocmulgee River and all known private and public wells are south of the Ocmulgee River, which is between the wells and the Bibb facility, groundwater would be intercepted by the Ocmulgee River prior to reaching any downgradient wells. Therefore, it is unlikely it would impact wells on the opposite side. In addition, due to the low concentration (6 ppb) of benzene in the groundwater at the site, in-stream maximum allowable concentrations (71.28 ppb) would not be exceeded. Based on the analytical results, AEM recommended no further action in both areas.

Additional assessment activities were conducted in Area 2 at the site in October 1993 using properly constructed wells. Based on analytical data, there is slight groundwater contamination (8 ppb benzene) in the immediate area of the former UST pit of the Bibb Yarns facility. However, AEM concluded that no further action is necessary since there are no receptors downgradient of the former UST pit, concentrations are very low, the source of contamination has been removed, and contaminated soil was excavated around the USTs to the state's stringent target cleanup level of 100 ppm TPH. On February 11, 1994, a No Further Corrective Action Required (NFCAR) letter was issued by the regulatory agency for both tank areas.

The past use of USTs at the site, as well as the confirmed soil and groundwater contamination (even with the NFCAR from EPD) constitutes a historical recognized environmental condition (HREC) associated with the site.

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The site is listed under facility Bibb Company Coliseum Plant, in the Air Facility System Data (AIRS), Resource Conservation and Recovery Act Non-Generator (RCRA NonGen/NLR), Facility Index System (FINDS), and Enforcement & Compliance History Information (ECHO) databases. The FINDS/ECHO listings for Bibb Company Coliseum Plant are in association with the facility's State Air Operating Permit, Air Quality Permit No. 021-00118 and stormwater discharge permitting. The RCRA-NonGen/NLR listing is for handling hazardous waste: D000 (not defined) and D011 (silver). The database includes selective information on facilities which generate, transport, store, treat and/or dispose of hazardous waste as defined by the RCRA. Non-generators do not presently generate hazardous waste. No violations or on-site compliance evaluations were reported for the site.

The site is listed under facility The Bibb Company (closed), in the AST database. This AST listing is for one tank of unknown size formerly located on the site. The tank was owned by McKinney's LP Gas Company.

The site is listed under facility 155 Coliseum Drive, in the Emergency Response Notification System (ERNS) database. The ERNS listing is associated with the release notification received during UST closure and removal activities at the Bibb Yarns Inc facility in 1993.

The site is listed under facility Bibb Mill, in the US Brownfields database. The Brownfield listing is for a Macon-Bibb County Environmental Protection Agency (EPA) Community Wide Brownfield Assessment Cooperative Agreement Grant that included the Bibb Mill site.

The site is listed under facility Former Bibb Mill Products, in the GA Non-HSI database. The GA Non-HSI listing is for a release notification received at the Bibb Mill Products facility in 2017. After review of findings presented in a Phase II ESA completed by Resolute Environmental & Water Resources Consulting (Resolute), the Georgia Environmental Protection Division (EPD) determined that EPD has no reason to believe that a release exceeding a reportable quantity had occurred at the site; therefore, it was recommended that the site not be listed on the HSI.

Resolute Environmental & Water Resources Consulting performed a Phase II ESA on the subject property. The findings of the Phase II revealed impacted soil at the site exceeding action levels, with benzene and 4-chloroaniline about the Georgia EPD Hazardous Site Response (HSRA) Notification Criteria (NC). Resolute submitted a HSRA Notification Report on September 5, 2017 for the VOC and SVOC soil detections on site. EPD formally recommended to not list the site on the Hazardous Site Inventory (HSI).

The Bibb Co Truck Shop

The Bibb Co Truck Shop, currently the office of Georgia Secretary of State, was observed to be 200 feet northwest and topographically up-gradient in relation to the site located at 237 Coliseum Drive. The facility was a historical truck stop that was registered under the UST database. The facility installed three gas tanks, one on May 5, 1970, one on May 5, 1972, and one on March 22, 1989. The two tanks installed in 1970 and 1972, one containing gas and the other containing diesel, were reported to be removed from the ground. They were constructed out of bare steel

with their pipes also being constructed out of bare steel. The presence of overfill protection was not reported in the database report. The tank that was installed in 1989 contained diesel and is reported to be permanently out of use – historical purposes. The tank is constructed out of cathodically protected steel and the pipes are constructed Safe Suction (Euro). No spills or leaks have been reported. Based on distance, its topographic up-gradient position relative to the site, and the unknown total duration of operation of the USTs, the northwestern UST facility constitutes a REC associated with the site. The REC was evaluated through the use of groundwater monitoring wells during former study performed by Resolute Environmental and no groundwater contamination was noted.

Unmapped facilities are those that do not contain sufficient address or location information to evaluate the facility listing locations relative to the site. Two facilities were found in the unmapped section. It is Terracon’s professional opinion that due to distance from the sight and/or topographical gradient relative from the site, the unmapped facilities do not constitute RECs to the site.

4.2 Local Agency Inquiries

Agency Contacted/ Contact Method	Response
Bibb County Planning and Zoning Department/ Fax	Terracon faxed a request to the Bibb County Planning and Zoning Department on September 29, 2022. No response was received prior to issuing this report. Terracon acknowledges that the lack of response from the department concerning the questionnaire is not a significant data gap.
Bibb County Fire department/ Fax	Terracon faxed a request to the Bibb County Fire Department on September 29, 2022. No response was received prior to issuing this report. Terracon acknowledges that the lack of response from the department concerning the questionnaire is not a significant data gap.
Bibb County Environmental Health Department/ Fax	Terracon faxed a request to the Bibb County Environmental Health Department on September 29, 2022. No response was received prior to issuing this report. Terracon acknowledges that the lack of response from the department concerning the questionnaire is not a significant data gap.

5.0 SITE RECONNAISSANCE

5.1 General Site Information

Information contained in this section is based on a visual reconnaissance conducted while walking through the site. The site and adjoining properties are depicted on the Site Diagram, which is included in Exhibit 2 of Appendix A. Photo documentation of the site at the time of the visual

reconnaissance is provided in Appendix B. Credentials of the individuals planning and conducting the site visit are included in Appendix E.

General Site Information

Site Reconnaissance				
Field Personnel	Matthew Moore			
Reconnaissance Date	October 21, 2022			
Weather Conditions	Sunny/75°F			
Site Contact/Title	Alex Morrison / Executive Director at Macon-Bibb County Urban Development Authority			
Building Description				
Building Identification	Building Use	Approx. Construction Date	Number of Stories	Approx. Size (ft ²)
Warehouse	Industrial	1980s	1	40,000
Site Utilities				
Drinking Water	City water			
Wastewater	City sewer			
Electric	Georgia Power			
Natural Gas	Unknown			

5.2 Overview of Current Site Occupants

The site is comprised of a vacant approximately 40,288 square foot (sf) storage warehouse building in the central portion of the site, asphalt paved parking areas throughout the site, Lake City Street traversing the central portion of the site, and undeveloped wooded land in the eastern portion of the site. Construction debris piles, the location of a recently burned four-story approximately 22,000 sf building, were located on the southwestern portion of the property. The site is formerly part of the Bibb Manufacturing Company Mill. There are currently no onsite occupants.

5.3 Overview of Current Site Operations

The site is partially developed, vacant land including a vacant warehouse on the western portion of the site. The eastern portion of the site is undeveloped wooded land. No current operations are on site.

5.4 Site Observations

The following table summarizes site observations and interviews. Affirmative responses (designated by an “X”) are discussed in more detail following the table.

Site Characteristics

Category	Item or Feature	Observed or Identified
Site Operations, Processes, and Equipment	Emergency generators	
	Elevators	
	Air compressors	
	Hydraulic lifts	
	Dry cleaning	
	Photo processing	
	Ventilation hoods and/or incinerators	
	Waste treatment systems and/or water treatment systems	
	Heating and/or cooling systems	
	Paint booths	
	Sub-grade mechanic pits	
	Wash-down areas or carwashes	
	Pesticide/herbicide production or storage	
	Printing operations	
	Metal finishing (e.g., electroplating, chrome plating, galvanizing, etc.)	
	Salvage operations	
Oil, gas or mineral production		
Other processes or equipment		
Aboveground Chemical or Waste Storage	Aboveground storage tanks	X
	Drums, barrels and/or containers ≥ 5 gallons	X
	MSDS or SDS	

Category	Item or Feature	Observed or Identified
Underground Chemical or Waste Storage, Drainage or Collection Systems	Underground storage tanks or ancillary UST equipment	X
	Sumps, cisterns, French drains, catch basins and/or dry wells	
	Grease traps	
	Septic tanks and/or leach fields	
	Oil/water separators, clarifiers, sand traps, triple traps, interceptors	
	Pipeline markers	X
	Interior floor drains	
Electrical Transformers/PCBs	Transformers and/or capacitors	X
	Other equipment	
Releases or Potential Releases	Stressed vegetation	
	Stained soil	
	Stained pavement or similar surface	
	Leachate and/or waste seeps	
	Trash, debris and/or other waste materials	X
	Dumping or disposal areas	X
	Construction/demolition debris and/or dumped fill dirt	X
	Surface water discoloration, odor, sheen, and/or free-floating product	X
	Strong, pungent or noxious odors	
	Exterior pipe discharges and/or other effluent discharges	
Other Notable Site Features	Surface water bodies	X
	Quarries or pits	
	Wastewater lagoons	
	Wells	X

Above Chemical or Waste Storage

Aboveground Storage Tanks

Two abandoned (>20,000) aboveground storage tanks (ASTs) were located on the center portion of the property. The tanks were empty and looked to be in poor condition. No indicator was observed on the tanks to show what the tanks were used for in the past. During an interview with the property owner, Mr. Barr stated the ASTs are his personal tanks and he plans to remove them. This is not considered a REC.

Drums, Barrels, and/or Containers ≥ 5 Gallons

One 55-gallon barrel was observed to be in the vacant warehouse on the property. No indication of what was contained in the barrel or staining around the barrel was observed. This is not considered a REC but the barrel should be removed from the property.

Underground Chemical or Waste Storage, Drainage, or Collection Systems ≥ 5 Gallons

Underground storage tanks or ancillary UST equipment

Four 30,000-gallon USTs containing No. 6 fuel oil that formerly operated at the site between 1968 and 1993. These tanks are located on the southeastern portion of the site and have been reported to be closed in place in 1993. The tank closure report indicates that there is soil contamination remaining below the tanks. Therefore, this is considered to be a REC.

Electrical Transformers/ PCBs

Transformers and/or capacitors

Five pole mounted transformers were observed throughout the property. All transformers were observed to be in good condition. This is not considered a REC.

Releases or Potential Releases

Trash, Debris, and/or Other Waste Materials

Scattered household debris was observed throughout the property. All debris should be disposed of properly prior to any construction. Trash and debris were observed throughout the property during the site reconnaissance. Based on visual observation (only of surface materials), a small quantity of debris, which mainly consisted of railroad ties and stakes, bedding, and furniture was observed. Leakage, spills or other releases from these materials were not observed during the visual reconnaissance. The debris materials did not appear to be hazardous in nature and are not considered to be RECs.

Dumping or Disposal Areas

A pile of construction debris (cement rubble and cylinders) was observed on the southern portion of the property. Leakage, spills or other releases from these materials were not observed during the visual reconnaissance.

Construction/Demolition Debris and/or Dumped Fill Dirt

Construction/demolition debris was observed on the southwestern portion of the site during the site reconnaissance. The pile is likely the remnants of Bibb Manufacturing Mill. Based upon visual observation of surface materials only, this area appeared to consist primarily of brick and wood and did not appear to be hazardous in nature. This area is accessed by Lake City Street. Leakage, spills or other releases from these materials were not observed during the visual reconnaissance.

Surface Water Discoloration, Odor, Sheen, and/or Free-floating Product

A sheen was observed on the surface of the water of the observed drainage ditch; however, no noxious or petroleum odors were noted emanating from within the drainage ditch at the time of the site reconnaissance.

Other Notable Site Features

Surface water bodies

A drainage stream was observed on the western portion of the site. Evidence of chemical sheens was observed on the surface of the waters, and no noxious or petroleum odors were noted emanating from within the drainage stream at the time of the site reconnaissance.

Wells

According to Macon-Bibb EPA Community Wide Brownfield Assessment Program, six permanent monitoring wells were installed during Resolute Environmental & Water Resources' Environmental Site Assessment. The results of the groundwater sampling showed results below action levels. Four of the six wells were observed on site. The permanent monitoring wells do not constitute a REC but should be properly abandoned prior to site development.

6.0 ADJOINING PROPERTY RECONNAISSANCE

Visual observations of adjoining properties (from site boundaries) are summarized below.

Adjoining Properties

Direction	Description
North	Commercial structures (<u>Georgia Secretary of State's Office</u>) followed by residential structures
East	Railroad tracks followed by wooded land and Ocmulgee Mounds National Historical Park
South	Interstate 16 followed by the Ocmulgee River
West	Coliseum Drive followed by the Macon Coliseum

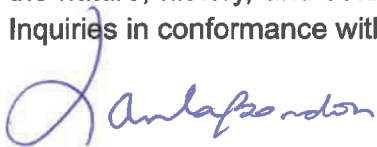
The Georgia Secretary of State's Office constitutes a REC to the site due to former UST operations. This REC was evaluated during a Phase II LSI performed by Resolute and no groundwater contamination was noted. None of the other surrounding property operations constitute RECs associated with the site. Refer to Section 4.1 for more information.

7.0 ADDITIONAL SERVICES

Per the agreed-on scope of services specified in the proposal, additional services (e.g., asbestos testing, wetlands evaluation, lead based paint testing, lead in drinking water testing, radon testing, vapor encroachment screening, etc.) were not conducted.

8.0 DECLARATION

I, Tameka Gordon, declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in Section 312.10 of 40 CFR 312; and I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the site. I have developed and performed the All-Appropriate Inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Tameka Gordon
Environmental Department Manager