

REPORT

**Phase I
Environmental Assessment
1576-1590 Piedmont Avenue
Fulton County
Atlanta, Georgia**

**Project Number:
2015.0429.01**

**Reconnaissance:
June 12, 2015
Regulatory Report:
May 18, 2015
Report Date:
June 22, 2015**



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UNITED CONSULTING





June 22, 2015

Wanda L. Morrison
Legal Administrative Assistant
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Via E-mail: Wanda.Morrison@smithmoorelaw.com

RE: Phase I Environmental Assessment
1576-1590 Piedmont Avenue
Atlanta, Georgia
Project No.: 2015.0429.01

Dear Ms. Morrison:

United Consulting is pleased to submit this report of our Phase I Environmental Assessment for the above-referenced project. We appreciate the opportunity to assist you with this project and look forward to our continued participation. Please contact us if you have any questions or if we can be of further assistance.

Sincerely,

UNITED CONSULTING

Seth H. Hobson
Senior Environmental Specialist

Scott D. Smelter
Principal

BTK/SHH/SDS/tl

SP: 2015.0459.01

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1.0 EXECUTIVE SUMMARY¹

United Consulting has completed a Phase I Environmental Assessment on the **1576-1590 Piedmont Avenue** site in Atlanta, Georgia. This property is hereafter referred to in this report as the Project Site. The results from this investigation are briefly summarized below. The text of the report should be reviewed for a discussion of these items.

1. The Project Site consisted of an approximate 0.5 acre tract of land made up of four adjacent parcels of land identified by the physical addresses of 1574, 1578, 1582, and 1586 Piedmont Avenue, NE in Atlanta, Fulton County, Georgia. These lots are further identified by Fulton County Parcel Numbers: 17 005600120060, 17 005600120052, and 17 005600120045. The Project Site also included a tract of land adjoining the four parcels to the northwest which was not accounted for by the Fulton County GIS.
2. At the time of the site reconnaissance, the Project Site contained a large commercial structure that was subdivided into individual suites and associated parking areas. No signs of stressed vegetation or visual signs of environmental concerns were observed during the site reconnaissance.
3. The regulatory review identified on-site and ten off-site regulated facilities within the various ASTM/AAI search distances from the Project Site. In addition, 16 historic automotive and dry cleaning operations were identified within 1,000 feet of the Project Site.
4. The regulatory and historic property review identified Vogue Cleaners, a historic on-site dry cleaner, as operating on the Project Site (1582 Piedmont Avenue) from approximately 1952 To 1957.
5. Clark Laundry and Dry Cleaning was listed as both a dry cleaning and UST facility adjoining the Project Site to the south. Piedmont and Boulevard Service Station was listed as a historic automotive station at the same address of Clark Laundry and Dry Cleaning (1572 Piedmont Avenue).
6. United Consulting has performed a Phase I Environmental Assessment for the Project Site in substantial conformance with the scope and limitations of ASTM Practice E 1527-13 and the All Appropriate Inquiries Rule. This assessment has revealed no evidence of RECs in connection with the Project Site *except for the following:*

REC 1: Vogue Cleaners, a historic on-site dry cleaning facility.

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

REC 2: Clark Laundry and Dry Cleaning a historic dry cleaners adjoining the Project Site to the south.

REC 3: Piedmont and Boulevard Service Station, a historic gasoline station adjoining the Project Site to the south.

REC 4: Metropolitan Cleaners, a dry cleaning facility located approximately 50 feet southwest of the Project Site.

7. Due to the presence of both on-site and off-site RECs a Vapor Encroachment Condition (VEC) cannot be ruled out at this time.

2.0 INTRODUCTION

2.1 Purpose

United Consulting was retained by **Smith Moore Leatherwood, LLP** to perform a Phase I Environmental Assessment of the Project Site. The purpose of this assessment was to determine whether there is evidence of recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), or controlled recognized environmental conditions (CRECs), in connection to the Project Site. The protocol used for this assessment is in substantial conformance with the American Society for Testing and Materials (ASTM) Practice E 1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, and the All Appropriate Inquiry (AAI) Rules, 40 CFR 312².

Recognized environmental conditions (RECs) is a term defined by ASTM as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment; 2) under conditions that indicate an existing release to the environment; or 3) under conditions that pose a material threat of a future release to the environment.

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. United Consulting can assist you with these non-scope items if needed.

Historical recognized environmental condition (HREC), is a term defined by ASTM as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority *or* meeting unrestricted use criteria established by a regulatory authority without subjecting the property to any required controls (such as property use restrictions or engineering controls). The HREC may or may not be considered to be a REC.

Controlled recognized environmental condition (CREC), is a term defined by ASTM as a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (such as property use restrictions, activity and use limitations or engineering controls). A CREC is also a REC.

² Title 40 of the Code of Federal Regulations, Part 312 (40 CFR 312), Standards and Practices for All Appropriate Inquiries, Effective November 1, 2006, as published in the Federal Register: updated December 30, 2013 (Volume 78, Number 250), pages 79319-79324.

The Practice E 1527-13 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 Act of 2002. The ASTM approach constitutes a limited, but commercially prudent and reasonable, inquiry. The E 1527-13 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 our services, which substantially follows ASTM Standard E 1527-13 and the AAI Rule, included the following items:

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

2.3 Significant Assumptions

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

- Site Use – This assessment was conducted with the understanding that the Client wishes to have a Phase I Environmental Site Assessment available to potential purchasers.

- Groundwater Flow Direction – The direction of groundwater flow in the area of the property has been inferred based on the site observations of topographic slope, proximity of nearby water bodies, and review of USGS topographic maps.
- Regulatory Records Information – This assessment is based on information provided by 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 Project Site. If any of these items are not accurate, United Consulting must be so informed so appropriate re-assessment can be performed.

2.4 Limitations

United Consulting has performed appropriate inquiry for this Phase I Environmental Assessment in general conformance with the scope and limitations of ASTM Practice E 1527-13 and 40 CFR 312, the AAI Rule. In accordance with this practice 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. United Consulting'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.

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

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

2.5 Special Terms and Conditions

The terms and conditions for this Phase I Environmental Assessment were set forth in United Consulting's May 7, 2015 proposal, executed May 15, 2015.

2.6 User Reliance

This report is for the exclusive use of **Smith Moore Leatherwood, LLP** and may be used only in reference to the project described herein. United Consulting is not responsible for the conclusions, opinions or recommendations of others, and shall not be liable for unauthorized use of this report.

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

3.0 SITE DESCRIPTION

3.1 Location and Legal Description

The Project Site consisted of an approximate 0.5 acre tract of land made up of four contiguous parcels of land located at 1574, 1578, 1582, and 1586 Piedmont Avenue in Atlanta, Fulton County, Georgia (Fulton County Parcel Numbers: 17 005600120060, 17 005600120052, 17 005600120045). United Consulting used a Fulton GIS map in combination with a client provided site drawing to determine the boundaries of the Project Site. This map is reproduced in Appendix A. A legal description of the Project Site was not provided. The Project Site also included a tract of land adjoining the four parcels to the northwest which was not accounted for by the Fulton County GIS.

3.2 Site and Vicinity General Characteristics

At the time of the June 12, 2015 site reconnaissance, the Project Site contained a subdivided commercial structure and associated parking areas. The Project Site was surrounded by mixed use development, including residential and commercial buildings.

3.3 Current Use of Project Site

At the time of the June 12, 2015 site reconnaissance, several businesses occupied the on-site structure. From the southern end of the Project Site structures preceding north the business were: El Gant Alterations, Smith's Olde Bar, Ansley Antiques (closed), Kean Architects, and Glory Be Hair Studio and Spa.

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

At the time of the site reconnaissance on June 12, 2015, the Project Site contained one large commercial structure that was subdivided into individual suites. The Project Site also contained paved parking areas.

3.5 Current Use of Adjoining Properties

Ansley II, a shopping center, adjoined the Project Site to the west. Cow Tippers, a restaurant, adjoined the Project Site to the north. The Project Site was adjoined to the east by Piedmont Avenue followed by single family residences and Smith Park. The Project Site was adjoined to the south by Smoothie King and Monroe Drive followed by an Exxon gasoline station.

4.0 USER PROVIDED INFORMATION

The Client elected to decline to provide the ASTM required information from the User until a formal User is identified.

4.1 Title Records

At this time, Untied Consulting has not been provided a chain of title.

4.2 Environmental Liens or Activity and Use Limitations

At this time, Untied Consulting has not been provided a chain of title or research indicating no evidence of environmental liens and/or activity and use limitations associated with the Project Site have been identified.

4.3 Specialized Knowledge of User

The client has not provided specialized knowledge associated with the Project Site at this time.

4.4 Commonly Known Information

The client has not provided comment on whether there is any commonly known information from within the local community that is material to RECs in connection to the Project Site.

United Consulting conducted interviews with available local persons during the reconnaissance in an attempt to obtain commonly known information concerning the Project Site. Details of the interviews performed are included in Section 7 of this report.

4.5 Valuation Reduction for Environmental Issues

The client has not commented on the fair market value of the property at this time.

4.6 Owner, Property Manager, and Occupant Information

The client did not provide United Consulting with contact data from the Project Site owner. The Fulton County Tax Assessors office indicated the site was owned by the Estate of Ms. Beverly B. Taylor.

4.7 Reason for Performing Phase I

This assessment was conducted with the understanding that the Client wishes to have a Phase I Environmental Site Assessment available to potential purchasers.

5.0 RECORDS REVIEW

5.1 Standard Environmental Record Sources

5.1.1 Search Basis:

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 1527-13 and 40 C.F.R. Part 312. The search distances are for the Project Site, adjoining properties, property within 0.5 mile, or property within 1.0 mile.

5.1.2 Record Search:

United Consulting utilized a commercial database reporting company (Environmental Data Resources, Inc., or EDR) to provide Federal, State, and Tribal environmental records. The search was conducted by outlining the property boundaries within the EDR mapping tool and requesting a search of applicable environmental databases for the required search distances. Due to the EDR Geocoding capabilities, facility locations are not always exact; therefore, some facilities may appear within the database reports that are actually beyond the required search distances. United Consulting field located the listed facilities and only those facilities confirmed to be within the respective ASTM or AAI search distances are referenced in this report. A copy of the database report used for the regulatory agency review is included in Appendix B. The facilities identified and search records reviewed are listed in Table 1.

TABLE 1: REGULATORY DATABASES

DATABASE	NUMBER AT PROJECT SITE	NUMBER WITHIN SEARCH DISTANCE
<i>SEARCH DISTANCE: 1-MILE</i>		
United States Environmental Protection Agency (US EPA) National Priority List (NPL)	0	0
US EPA CORRACTS database	0	0
Georgia EPD Hazardous Site Inventory (HSI), also referred to as the State Priority List (SPL) or State Superfund	0	0
<i>SEARCH DISTANCE: 1/2-MILE</i>		
U.S. Tribal Records (Indian Reservations)	0	0
U.S. Tribal LUST Records (Indian LUST)	0	0
Georgia Brownfields Public Records List (BROWNFIELDS)	0	0
US EPA delisted National Priority List (Delisted NPL)	0	0
US EPA Brownfields (US BROWNFIELDS)	0	0
US EPA Resource Conservation and Recovery Act – Treatment, Storage and Disposal (RCRA TSD) Facilities List	0	0
US EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database	0	0
US EPA CERCLIS, No Further Remedial Action Planned (NFRAP) database	0	0
Georgia Compensation and Liability Information System (SCL) also referred to as Non-HSI .	0	2
Georgia Leaking UST List (LUST)	0	5
Georgia Environmental Protection Division (EPD) Operating Solid Waste Facilities List (SWLF)	0	0
<i>SEARCH DISTANCE: PROPERTY AND ADJOINING</i>		
Georgia EPD Registered Underground Storage Tanks (UST) List	0	2

DATABASE	NUMBER AT PROJECT SITE	NUMBER WITHIN SEARCH DISTANCE
US EPA Resource Conservation and Recovery Act (RCRA) Generators database (GNRTR) **	0	4
U.S. Tribal UST Records (Indian UST)	0	0
<i>SEARCH DISTANCE: PROPERTY ONLY</i>		
US EPA Emergency Response Network System (ERNS) and Georgia Spills List database (SPILLS)	0	0
US Engineering Controls (US ENG CONTROLS)	0	0
US and State Institutional Controls (INST CONTROLS)	0	0
Facility Index System (FINDS)	0	0
<i>Non-AAI DATABASE SEARCHES: 1,000 FEET</i>		
GA Dry Cleaner Database (DRYCLEANERS)	0	8
EDR Proprietary Historical Records (HISTORIC)	0	16
Other (database)	0	0
<p>NOTES: The list/database information was obtained from Environmental Data Resources, Inc. (EDR). EDR updates their system information routinely. Their databases are derived from databases developed by various government agencies. United Consulting cannot warrant the accuracy of the information included in these databases. The EDR data was relied upon for this Assessment.</p> <p>*No Federal Tribal Lands are located within Georgia; therefore, no Tribal LUST or UST files exist for Georgia.</p> <p>**The RCRA-Generators database includes Large Quantity Generators (LQG), Small Quantity Generators (SQG), Conditionally Exempt-Small Quantity Generators (CESQG), and Non-Generators (Non-Gen)</p>		

5.1.3 Listed Regulated Facilities:

There were no regulated facilities identified at the Project Site. There were ten off-site regulated facilities identified within the various ASTM/AAI search distances from the Project Site.

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. United Consulting reviewed this list, which included 16 orphan facilities, to determine if these Orphan Facilities were located within the respective search distances from the Project Site. Piedmont Cleaning Center was listed as dry cleaners on the primary list of identified facilities and the Orphan List. Piedmont Cleaning Center was located approximately 630 feet to the southwest in a down-gradient relationship to the Project Site. This facility is not considered a REC to the Project Site. Based on United

Consulting’s map review and field reconnaissance, the remaining listed orphan facilities do not appear to be located within the ASTM or AAI radii from the Project Site.

5.1.5 Other Notable Facilities

Other notable facilities include those businesses, properties or facilities that were not listed as regulated facilities, but were observed during the reconnaissance and appear to represent potential RECs. Other notable facilities also include those facilities that were listed under non-ASTM or AAI databases or were outside the required search distances. No other notable facilities were observed during the site reconnaissance.

5.1.6 Historical Facilities

EDR has compiled a proprietary list 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 gasoline stations/filling stations/service stations or dry cleaning establishments. EDR identified 16 off-site historical facilities within 1,000 feet from the Project Site. Information regarding the nearest historical facilities is included in Table 2 below.

5.1.7 Discussion of Identified Facilities

Table 2 summarizes the facilities identified in the vicinity of the Project Site and provides United Consulting’s conclusion concerning whether the facility represents a REC to the Project Site. A discussion of these facilities follows Table 2 below.

TABLE 2: SUMMARY OF IDENTIFIED FACILITIES

No.	Facility & Address	Program	Proximity & Direction	Apparent Hydraulic Relation	Potential Impact, Y/N
1	Vogue Cleaners 1584 Piedmont Avenue NE	Hist Cleaners	On-site	Connected	Y
2	Piedmont and Boulevard Service Station/Clark Laundry and Dry Cleaners 1572 Piedmont Avenue NE	Hist Auto Stat Hist Cleaners UST DRYCLEANERS Financial Assurance	Adjoining south	Up- gradient	Y
3	Metropolitan Cleaners 1579 Monroe Drive NE	DRYCLEANERS Hist Cleaners RCRA NonGen/NLR FINDS	Adjoining west	Side- gradient	Y

No.	Facility & Address	Program	Proximity & Direction	Apparent Hydraulic Relation	Potential Impact, Y/N
4	Ansley Mall Exxon 1570 Monroe Drive NE	LUST UST Hist Auto Stat RCRA-CESQG FINDS Financial Assurance	Adjoining south	Down- gradient	N
5	Piedmont Monroe Laundromat 1610 Piedmont Avenue NE	Hist Cleaners	220 feet north	Side- gradient	N
6	Johnson Jake Garage 1564 Monroe Drive NE	Hist Auto Stat	200 feet south	Down- gradient	N
7	Price S Gulf Service 1551 Piedmont Ave NE	Hist Auto Stat	200 feet south	Down- gradient	N
8	Ansley Mall Shell/Wood S Service Station 1539 Piedmont Avenue NE	LUST UST Hist Auto Stat Financial Assurance	280 feet south	Down- gradient	N
<p>Note: Facilities identified in BOLD are considered RECs The remaining identified regulated and historic facilities do not represent RECs to the Project Site based on distance and topographic relations to the Project Site.</p>					

1. **Vogue Cleaners**
1584 Piedmont Avenue NE
(On-site and hydraulically connected)

Vogue Cleaners was listed as a historical cleaners in the EDR report. This facility was listed as operating during the years 1952 and 1957. Based on the on-site location and years of operation, Vogue Cleaners is considered a REC to the Project Site.

2. **Piedmont and Boulevard Service Station/Clark Laundry and Dry Cleaners**
1572 Piedmont Avenue NE
(Adjoining south and up-gradient)

Clark Laundry and Dry Cleaning adjoined the Project Site to the south and was listed as a dry cleaning facility that is believed to have operated from 1957 to 1999, according to the City Directory review. This facility was also listed as a UST facility. The four historic USTs at this facility reportedly contained petroleum products and were associated with the historical operations at Piedmont and Boulevard Service Station, which was listed at the same address as Clark Laundry and Dry Cleaning. It is believed that this historic gasoline station operated under various names from 1932 to 1952.

Based on its proximity to the Project Site and years of operation the Clark Laundry and Dry Cleaning and the preceding Piedmont and Boulevard Service Station facilities are considered RECs to the Project Site.

3. Metropolitan Cleaners
1579 Monroe Drive NE
(Adjoining west and side-gradient)

Metropolitan Cleaners was listed as a dry cleaning facility in the EDR report. This facility was first listed in the Yellow Pages in 1988. According to the city directory search, the name of this facility is believed to have changed to Best Cleaners in 2008. United Consulting interviewed a Best Cleaners employee via telephone that who stated the facility performs on-site dry cleaning. Based on the proximity and age of this facility to the Project Site (approximately 50 feet west), Metropolitan Cleaners is considered a REC to the Project Site.

4. Ansley Mall Exxon
1570 Monroe Drive NE
(Adjoining south and down-gradient)

Ansley Mall Exxon was listed as a leaking underground storage tank (LUST) facility in the EDR report. Based on the down-gradient position of this facility in relation to the Project Site, Ansley Mall Exxon is not considered a REC to the Project Site, at this time.

5. Piedmont Monroe Laundromat
1610 Piedmont Avenue NE
(220 feet north and side-gradient)

Piedmont Monroe Laundromat was listed as a historic cleaners in the EDR report. This facility was a self serve laundry in 1986 and does not appear to have operated as a dry cleaning facility. In United Consulting's opinion, Piedmont Monroe Laundromat does not represent a REC to the Project Site.

It is United Consulting's opinion that the remaining identified regulated and historic facilities do not represent RECs to the Project Site due to their distance, topographic relation, and/or physical separation from the Project Site.

5.2 Additional Environmental Record Sources

A Google search was conducted for the Project Site addresses (1574, 1578, 1582, and 1586 Piedmont Avenue NE). The query did not provide results of environmental significance for the Project Site.

United Consulting also conducted a search for the Project Site addresses using the EPA EnviroFacts Multi-system search (<http://www.epa.gov/enviro/facts/multisystem.html>). No results were returned for the Project Site address.

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 description of the physical setting for the Project Site is provided below, starting with the topography and geology. The estimated surface water and groundwater flow directions are then estimated and described.

The Project Site is located in the Piedmont Physiographic Province of Georgia, which is characterized by medium- to high-grade metamorphic rocks and scattered igneous intrusions. Topography in the province is variable and ranges from gently rolling hills in the south to moderate to steep hills in the north. Based on the 1997 USGS topographic map of *Northeast Atlanta*, elevations in the vicinity of the Project Site range from approximately 820 feet above mean sea level (ft msl) to approximately 900 ft msl. The Project Site had an approximate elevation of 850 ft msl to 870 ft msl. Surface water flow at the Project Site and immediate vicinity generally flows to the west. Figure 2 shows the topography of the Project Site and surrounding areas.

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

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

Based upon the 1927 City of Atlanta topographic map, groundwater at the Project Site is expected to flow west. Areas considered up-gradient of the Project Site are to the northeast within approximately 550 feet of the Project Site and to the south within approximately 60 feet

of the Project Site. This anticipated direction of groundwater flow was used to assist in the evaluation of potential impacts from nearby properties.

5.4 Historical Use Information

5.4.1 Approach:

Historical research was conducted to assess the history of the 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 and outlined below.

TABLE 3: SUMMARY OF HISTORIC DOCUMENTS REVIEWED

Original Date	Revision Date	Document	Publisher/Source
1895	NA	30-Minute USGS Topographic Map: <i>Atlanta, Georgia</i>	USGS/EDR
1919	NA	30-Minute USGS Topographic Map: <i>Camp Gordon, Georgia</i>	USGS/EDR
1927	NA	City of Atlanta Topographic Map, Vicinity Sheet 59	COA/EDR
1954	1968, 1973	7.5-Minute USGS Topographic Map: <i>Northeast Atlanta</i>	USGS/EDR
1993	NA	7.5-Minute USGS Topographic Map: <i>Northeast Atlanta</i>	USGS/EDR
1997	NA	7.5-Minute USGS Topographic Map: <i>Northeast Atlanta</i>	USGS/EDR
1938, 1940, 1949, 1955, 1960, 1968, 1972, 1978, 1981, 1988, 1993, 2005, 2007, 2009, 2010	NA	Aerial Photographs	EDR
1925, 1950, 1978	NA	Sanborn Maps	EDR
1927, 1932, 1937, 1942, 1947, 1952, 1957, 1961, 1965, 1971, 1976, 1981, 1986, 1991, 1994, 1999, 2005, 2008, 2013	NA	City Directories	EDR

No other historic maps or aerial photographs were readily available for review.

5.4.2 Project Site:

Due to the scale of the 1895 and 1919 USGS topographic maps, no individual structures were mapped on the Project Site.

In the 1925 Sanborn Map, no structures were mapped on the Project Site.

The 1927 USGS topographic map showed one large structure mapped on the Project Site.

The 1938 aerial photograph showed the Project Site to contain what appeared to be one large commercial structure along the eastern boundary of the Project Site. The 1940, 1949, 1955, 1960, 1968, 1972, 1978, 1981, 1988, 1993, 2005, 2007, 2009, and 2010 aerial photographs showed no significant changes to the Project Site.

No structures were mapped on the Project Site in the 1954, 1968, 1973, 1993, and 1997 USGS topographic maps. The shading of the Project Site in these maps indicated that only landmark structures were mapped and that the Project Site was located in a developed urban area.

The 1950 Sanborn Map showed the Project Site to contain what appeared to be one large commercial structure along the eastern boundary of the Project Site. This structure was divided into several stores and a Masonic Lodge.

The 1978 Sanborn Map showed no significant changes to the Project Site from the 1950 Sanborn Map.

City Directory listings were reviewed for known addresses associated with the Project Site, specifically 1574, 1578, 1582, and 1586 Piedmont Avenue. The Project Site was listed under several business names such as Parker Plumbing and Heating Co. in 1932, Vogue Cleaners in 1952-1957, Gene & Gabes Restaurant from 1976-1991, and El-Gant Alterations Inc. in 2013.

5.4.3 Adjoining Properties:

Due to the scale of the 1895 and 1919 topographic maps, no structures were observed adjoining the Project Site.

The 1925 Sanborn Map showed a filling station adjoining Project Site to the south followed by North Boulevard. Several single-family residential structures were shown to the west of the Project Site.

The 1927 City of Atlanta topographic map showed one structure adjoining the Project Site to the south and what appeared to be three single-family residential structures west of the Project Site. Dense residential development was shown east of the Project Site.

The 1938 aerial photograph showed what appeared to be a commercial structure north of the Project Site and a small commercial structure adjoining the Project Site to the south. Two commercial structures appeared to adjoin the Project Site to the south following present day Monroe Drive.

No significant changes to the adjoining properties were observed in the 1940 aerial photograph.

In the 1949 aerial photograph, the structure previously shown north of the Project Site appears to have been removed and replaced.

In the 1950 Sanborn Map, the structure north of the Project Site was labeled as a restaurant and the structure adjoining the Project Site to the south was labeled as a filling station. A bake shop was shown adjoining the Project Site to the north. An automotive repair facility, a laundry facility, and two filling stations were shown south of the Project Site.

No significant changes were observed in the 1954, 1968, 1973, 1993, or 1997 USGS topographic maps reviewed.

The 1955 aerial photograph showed the addition of a large commercial structure south-southeast of the Project Site.

The 1960 aerial photograph showed no significant changes to the properties adjoining the Project Site.

The 1968 aerial photograph showed the addition of an outdoor mall or large shopping center west of the Project Site following present day Monroe Drive as well as the redevelopment of the properties adjoining the Project Site to the south following present day Monroe Drive. This photograph also showed the addition of multifamily residential structures northwest of the Project Site.

The 1972 and 1978 aerial photograph showed no significant changes to the properties adjoining the Project Site.

The 1978 Sanborn Map labeled the shopping center west of the Project Site as “Ansley Mall Shopping Center”. This map also showed a filling station adjoining the Project Site to the south following Monroe Drive and two filling stations south of the intersection of Monroe Drive and Piedmont Avenue. A restaurant was shown adjoining the Project Site to the north.

No significant changes to the properties adjoining the Project Site were shown in the 1981 aerial photograph.

In the 1988 aerial photograph, the two structures adjoining the Project Site to the south following Monroe Drive had been replaced with one commercial structure that is believed to be the present

day Exxon gasoline station. In this photograph, the addition of a commercial structure was shown adjoining the Project Site to the west.

No significant changes were shown in the 1993, 2005, 2007, 2009, or 2010 aerial photographs. Available City Directory listings were reviewed in respects to the addresses of adjoining properties. The results of the City Directory review are available below in Table 4.

TABLE 4: ADJOINING CITY DIRECTORY LISTINGS

Address	Listing	Dates of Operations
1570 Monroe Drive NE	All Star Convenience Stores/Ansley Mall Exxon/Garris Enco Service Center	1971-2013
1579 Monroe Drive NE	Best Cleaners	2008-2013
1579 Monroe Drive NE	Metro Cleaners	1991-2005
1572 Piedmont Avenue NE	Filling Station (Wofford Oil, Piedmont and Boulevard, McArthur, Pruitt, ABeauchler Harry)	1932-1952
1572 Piedmont Avenue NE	Clark Laundry & Dry Cleaners	1957-1999
1544 Piedmont Avenue NE	Ansley Cleaners and Laundry/Laundry Lounge/Norge Village Laundry and Cleaners/Stoddards Laundry & Cleaners	1971-2013

6.0 RECONNAISSANCE

6.1 Project Site Reconnaissance

6.1.1 Methodology and Limiting Conditions:

United Consulting’s reconnaissance of the Project Site was performed on June 12, 2015. The reconnaissance was conducted to look for evidence of recognized environmental conditions at the Project Site. The reconnaissance consisted of an on-site, visual review by a representative from United Consulting: Mr. Tyler Kelly, Staff Environmental Specialist. The reconnaissance was performed by walking portions of the perimeter boundaries of the Project Site and accessible portions of the interior of the Project Site. Interior access to the Project Site was limited to suites of the on-site structure that had tenants present during the site reconnaissance.

6.1.2 Results:

The results of the reconnaissance are summarized in Table 5. Additional discussion is provided following Table 5 as appropriate. Photographs of the Project Site are included in Appendix D.

TABLE 5: SITE RECONNAISSANCE INFORMATION

ITEMS	APPLIC. (Yes/No)	DISCUSSION (Blanks indicate items not observed on the Project Site)
Site Structures	Yes	The Project Site contained one large commercial structure that was subdivided into individual suites. The Project Site also contained paved parking areas.
Roads and Access	Yes	The Project Site was accessed via Monroe Drive
Water Service	Yes	Water was observed to be supplied by the City of Atlanta
Sewage Service	Yes	Sewage service was observed on adjoining properties to be supplied by the City of Atlanta.
<i>Interior and Exterior Observations</i>		
Current Use of the Property	Yes	Discussed below
Past Use of the Property	No	
Hazardous Substances and Petroleum Products in Connection with identified uses	No	
Storage Tanks	No	
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	
<i>Interior Observations</i>		
Heating/Cooling	Yes	Typical HVAC systems were observed at the Project site.
Stains or Corrosion	No	
Drains and Sumps	No	
<i>Exterior Observations</i>		
Ponds and/or Pools of Liquid or Sludge	No	
Stained Soil or Pavement	Yes	<i>De minimis</i> staining observed in parking lot spaces

ITEMS	APPLIC. (Yes/No)	DISCUSSION (Blanks indicate items not observed on the Project Site)
Stressed Vegetation	No	No stressed vegetation was observed on the Project Site.
Solid Waste	Yes	Typical dumpsters were observed on the Project Site.
Waste Water	No	
Wells	No	No wells were observed on the Project Site.
Septic Systems	No	
<i>Other Observations</i>		
Easements	Yes	Typical utility easements (sewer, water, etc.) were observed along Monroe Drive and Piedmont Avenue.
Hydraulic Equipment	No	
Contracted Maintenance Services	No	

Site Structures/Property Use:

At the time of the June 12, 2015 site reconnaissance, several businesses occupied the on-site structure. From the southern end of the Project Site structures preceding north the business were: El Gant Alterations, Smith’s Olde Bar, Ansley Antiques (closed), Kean Architects, and Glory Be Hair Studio and Spa.

Tanks:

No ASTs or features indicative of USTs, such as fill pipes and vent ports, were observed on the Project Site.

6.2 Area Reconnaissance

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 adjoining or nearby properties. The reconnaissance was performed by walking along the surrounding properties, and driving along the nearby public roads. Observations were limited to what could be seen from publicly accessible areas.

6.2.2 Results:

The results of the reconnaissance are summarized in Table 6. Additional discussion is provided following Table 6, as appropriate. The areas immediately adjoining to the Project Site were a mixture of residential property and commercial property. Photographs of the surrounding area are included in Appendix D. In the major directions, the properties were:

North:

Cow Tippers;

East:

Piedmont Avenue followed by Smith Park and residences;

South:

Smoothie King and Monroe Drive followed by an Exxon gasoline station;

West:

Ansley II Shopping Center whose tenant list included China Garden, H&R Block, Bubbles, Best Cleaners, Crème de la Crème, UPS Store, and T-Mobile.

TABLE 6: AREA RECONNAISSANCE INFORMATION

ITEMS	APPLIC. (Yes/No)	DISCUSSION (blanks indicate items not observed on nearby properties)
Area Structures	Yes	Discussed below.
Area Property Use	Yes	Discussed below.
Wells	No	
Tanks	Yes	Discussed below.
Drums	No	
Other Containers	No	
Storage Areas	No	
Ponds and/or Pools Of Liquid or Sludge	No	
Stained Soil or Pavement	No	Only <i>de minimis</i> staining was observed in the parking lots surrounding the Project Site. No staining observed on tile floor within the lobby area of Midtown Cleaners (aka Best Cleaners).
Stressed Vegetation	No	
Solid Waste	Yes	Typical dumpsters were observed in the area surrounding the Project Site.
Odors	No	No unusual odors were noted on the adjoining properties.
Drains and Sumps	Yes	Storm drains were observed along curbs of parking lots and within parking lots.

Area Structures/Property Use:

The Project Site was located in a mixed use area and was surrounded by primarily commercial and residential properties. Smith Park adjoined the Project Site to the east, following Piedmont Avenue. Ansley II Shopping Center is located to the west of the Project Site.

Tanks:

Features indicative of USTs, such as fill pipes and vent ports, were observed at the Exxon gasoline station adjoining the Project Site to the south. Also, a used vegetable oil aboveground storage tank was observed east of the China Garden restaurant that adjoined the Project Site to the west.

7.0 INTERVIEWS

7.1 Process

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

7.2 Property Owners

United Consulting understands that the property owner has been identified as the Estate of Ms. Beverly B. Taylor. Further, United Consulting understands Smith Moore Leatherwood, LP is acting on behalf of the estate.

7.3 Site Manager/Occupants/Local Residents

United Consulting contacted Best Cleaners via telephone. An employee at Best Cleaners indicated that the facility performs on-site dry cleaning.

United Consulting interviewed Amber, an employee of the southern adjoining Smoothie King. In general, Amber was not aware of environmental concerns related to the Project Site or the surrounding area.

United Consulting interviewed Ms. Joann Lancaster, a local resident who was present at Glory Be Hair Studio & Spa at the time of the site reconnaissance. Ms. Lancaster indicated that the Smoothie King which adjoined the Project Site to the south was historically a “coin laundry” for approximately 30 years. In general, Ms. Lancaster was not aware of environmental concerns related to the Project Site or the surrounding area.

United Consulting interviewed Ms. Gloria Lee of Glory Be Hair Studio & Spa during the site reconnaissance. Ms. Lee had been familiar with the Project Site since 1999. Ms. Lee indicated that there was a fire at some point in time at Ansley Antiques (1586 Piedmont Avenue). According to Ms. Lee, the hair studio had previously been utilized as a framing shop and grocery store. In general, Ms. Lee was not aware of environmental concerns related to the Project Site or the surrounding area.

United Consulting interviewed Mr. Robin Vaughn of Smith’s Olde Bar during the site reconnaissance. Mr. Vaughn had been familiar with the Project Site for a few months. According to Mr. Vaughn, the Project Site was historically used as Gene and Gabe’s and as a Masonic Lodge. In general, Mr. Vaughn was not aware of environmental concerns related to the Project Site or the surrounding area.

United Consulting interviewed Mr. Sean McPherson at the Smith's Olde Bar offices located on the second floor of the Project Site. Mr. McPherson had been familiar with the Project Site for ten years. In general, Mr. McPherson was not aware of environmental concerns related to the Project Site or the surrounding area.

7.4 Local Government Officials

United Consulting contacted Ms. Elaine Jones-Clark of Atlanta Fire and Rescue via email. Ms. Jones-Clark indicated that the Atlanta Fire Department did not show any information on spills, leaks, releases, or hazardous materials concerns at 1574, 1578, 1582, or 1586 Piedmont Avenue NE.

8.0 VAPOR INTRUSION

The purpose of the vapor intrusion (VI) screening was to assess for potential vapor intrusion risks, which could impact buildings on the Project Site. This included a tier one screening per the ASTM Standard for "Vapor Encroachment Screening on Property Involved in Real Estate Transactions," E2600-10. Since both on-site and off-site RECs were identified in relation to the Project Site, the presence of a Vapor Encroachment Condition (VEC) cannot be ruled out, at this time.

9.0 FINDINGS

The Project Site consisted of an approximate 0.5 acres located at 1574, 1578, 1582, and 1586 Piedmont Avenue in Atlanta, Fulton County, Georgia. According to the historical review, the Project Site has been developed since around 1927. Currently, the Project Site is utilized by several small businesses including an alterations shop, hair salon, bar/restaurant, and antiques store.

According to the city directory search, one historic dry cleaner, Vogue Cleaners, operated on the Project Site. It is believed to have operated from at least 1952 to 1957. No other on-site RECs were identified on the Project Site.

Clark Laundry and Dry Cleaning adjoined the Project Site to the south and was listed as a dry cleaning facility that is believed to have operated from 1957 to 1999, according to the City Directory review. This facility was also listed as a UST facility. Four historic USTs were removed from this facility and reportedly held petroleum products and are believed to be associated with historical site operations as Piedmont and Boulevard Service Station. It is believed that Piedmont and Boulevard Service Station operated adjacent to the site from 1937 to 1952.

Metropolitan Cleaners, located approximately 50 feet to the west of the Project Site, was listed as a dry cleaning facility in the EDR report. This facility was first identified in city directory information in 1988. According to the city directory search, the name of this facility changed to Best Cleaners in 2008. A Best Cleaners employee indicated to United Consulting via telephone that the facility performs on-site dry cleaning operations.

10.0 DATA GAPS

United Consulting conducted a thorough review on the use of the Project Site during completion of this Phase I Environmental Assessment. The historical research included sources from 1895 to present. Table 7 below summarizes many of the *common* data failures/gaps encountered during the completion of a Phase I Environmental Assessment. Per ASTM and AAI standards, United Consulting has relied on ‘User Provided Information’ to complete this property assessment. If the user fails to provide this information to United Consulting, it could result in a determination that “all appropriate inquiry” for this site is incomplete. Further, United Consulting 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 7: SUMMARY OF POTENTIAL DATA FAILURES/GAPS

Report Section	Information/Data	Data See Descriptions Below	Significant Data Gap (Y/N/NA)	Additional Action(s) (Y/N/NA)
<i>User Provided Information</i>				
4.1	Title History	Not Provided	N	Y
4.2	Environmental Lien Review	Not Provided	N	Y
4.3	Specialized Knowledge	Not Provided	N	N
4.4	Commonly Known Information	Not Provided	N	N
4.5	Valuation Reduction for Environmental Issues	Not Provided	N	N
<i>Historical Use Information</i>				
5.4.1	Topographic Maps	Obtained	N	N
5.4.1	Aerial Photographs	Obtained	N	N
5.4.3	City Directories	Obtained	N	N
5.4.4	Sanborn Fire Insurance Maps	Obtained	N	N
<i>Site Reconnaissance</i>				
6.1	Exterior Accessibility	Accessible	N	N
6.1	Interior Accessibility	Non Applicable	N	N
<i>Area Reconnaissance</i>				
6.2	Accessibility	Accessible	N	N

Report Section	Information/Data	Data See Descriptions Below	Significant Data Gap (Y/N/NA)	Additional Action(s) (Y/N/NA)
<i>Interviews</i>				
7.1.1	Property Owner	Not Obtained	N	N
7.1.2	Site Manager/Occupants/Local Residents	Obtained	N	N
7.1.3	Local Government Officials	Obtained	N	N
Notes: Common Data Descriptions: Not Provided, Provided, Not Contacted, Contacted, Accessible, Not Accessible, Obtained, Not Obtained, Gap, Failure, NA = Not Available Per ASTM E 1527-13, failure to provide the ‘user provided information’ to the environmental professional could result in a determination that “all appropriate inquiry” for this site is incomplete.				

United Consulting conducted a thorough historical review on the past use of the Project Site during completion of this Phase I Environmental Assessment. The historical research included sources from 1895 to present. As part of this assessment, United Consulting reviewed aerial photography, city directories, Sanborn Maps, and topographic maps. No significant historic document data gaps that prevented United Consulting from forming an opinion regarding environmental conditions at the Project Site were encountered.

The client opted not to provide United Consulting with a copy of the User Questionnaire at this time. As outlined in the ASTM guidance, this represents a data gap. However, based on the review of available source documentation and our site visit, it is United Consulting’s opinion that an opinion can be formed in regards to the environmental condition of the Project Site relative to this Phase I. We also recommend that the attorney who researches the title look for signs of environmental liens and activity and use limitations. If found they should be reported to United Consulting for further evaluation.

11.0 OPINION

This assessment has identified four RECs in association with the Project Site. One of these RECs, Vogue Cleaners (REC 1), was reportedly located on-site and was identified by the physical address of 1584 Piedmont Avenue in the city directories review. The cleaners reportedly operated from at least 1952 to 1957.

Three off-site RECs have been identified in association with the Project Site and include an adjoining historic cleaner, Clark Laundry and Dry Cleaning (REC 2), which operated from at least 1957 to 1999. Prior to use as a dry cleaners, the Clark Laundry site was developed with a gasoline station which reportedly operated from 1932 to 1952 (REC 3).

An adjoining dry cleaner, Metropolitan Cleaners (REC 4), was identified approximately 50 west of the Project Site. This facility currently conducts on-site dry cleaning as Best Cleaners and historic document review first identified as Metropolitan Cleaners in 1988.

According to EPA estimates, in 1998 there were approximately 36,000 active dry cleaning facilities in operation in the U.S. In 2001, the EPA estimated that 75% of the active dry cleaner sites are contaminated with volatile chemical solvents. Based on the EPA's research and United Consulting's past experience with dry cleaners, it is our opinion that each of the on-site and off-site dry cleaners represent RECs to the Project Site at this time.

Further, historic use of the adjacent property as a gasoline station is considered a REC to the Project Site.

12.0 CONCLUSIONS

United Consulting has performed a Phase I Environmental Assessment for the Project Site in substantial conformance with the scope and limitations of ASTM Practice E 1527-13 and the All Appropriate Inquiries Rule. This assessment has revealed no evidence of RECs in connection with the Project Site *except for the following*:

REC 1: Vogue Cleaners, a historic on-site dry cleaning facility (1952-1957).

REC 2: Clark Laundry and Dry Cleaning a historic dry cleaners adjoining the Project Site to the south (1957-1999).

REC 3: Piedmont and Boulevard Service Station, a historic gasoline station adjoining the Project Site to the south (1932-1952).

REC 4: Metropolitan Cleaners, a dry cleaning facility located approximately 50 feet southwest of the Project Site (1988 to 2005, 2008 to present as Best Cleaners).

Since on-site and off-site RECs were identified in relation to the Project Site, the presence of a Vapor Encroachment Condition (VEC) cannot be ruled out at this time.

13.0 DEVIATIONS

The Phase I Environmental Assessment was performed to substantially meet the requirements of ASTM for such investigations. The technical requirements of the ASTM standard, revised in the year 2013, were followed.

United Consulting's opinions included issues beyond strict liability under CERCLA, or Superfund. No substantial deviations or limiting conditions to the ASTM were made.

14.0 REFERENCES

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

15.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONAL

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 subject property. I have developed and performed all appropriate inquiries 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 limitation, 40 CFR 312. This practice does not address requirements of any state or local laws. Users are cautioned that state or local laws may impose environmental assessment 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 not eliminate, uncertainty regarding the existence of recognized environmental conditions, and this practice recognizes reasonable limits of time and cost.



Signature of Environmental Professional
Seth H. Hobson.
Senior Environmental Specialist
UNITED CONSULTING

16.0 QUALIFICATIONS

United Consulting's qualifications are summarized in Appendix G. The resume for the Environmental Profession is also provided in this appendix.

UNITED CONSULTING

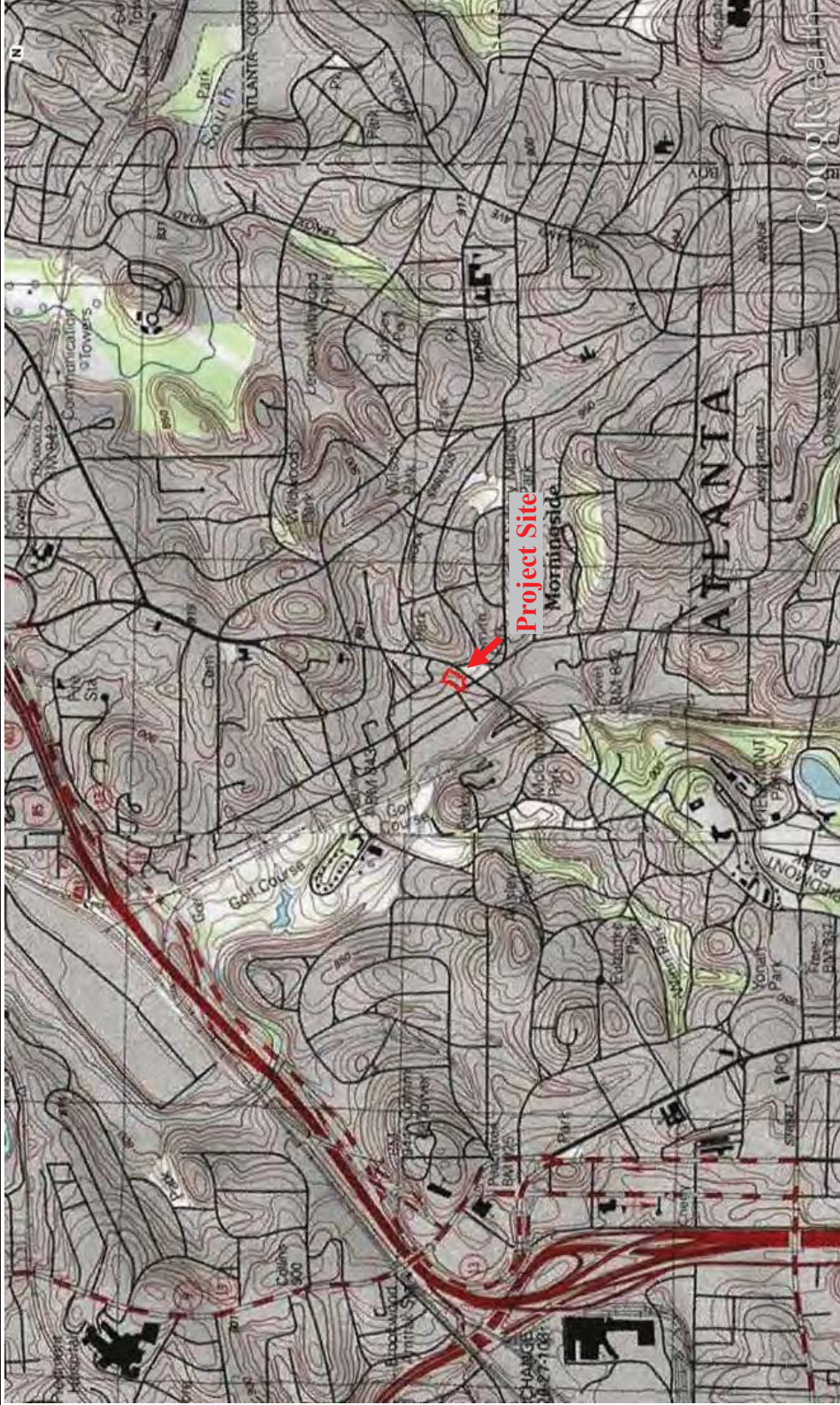


Scale:	As Shown
Prepared:	BTK
Checked:	
Project No.:	2015.0429.01

Notes:

Client:	Smith Moore Leatherwood LLP
Site:	1576-1590 Piedmont Avenue
Title:	Site Location Map

FIG. 1



Scale:	As Shown
Prepared:	BTK
Checked:	
Project No.:	2015.0429.01

Notes:

Client:	Smith Moore Leatherwood LLP
Site:	1576-1590 Piedmont Avenue
Title:	USGS Topographic Map

FIG. 2

APPENDIX A – TAX PLAT & TITLE INFORMATION



Tax Parcel Map: 1576-1590 Piedmont Avenue

2015.0429.01

APPENDIX B – REGULATORY DATABASE INFORMATION

1576-1590 Piedmont Ave

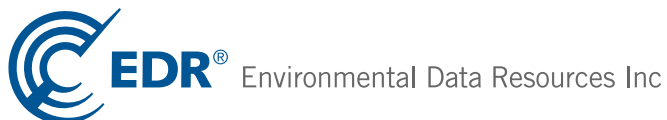
1582 Piedmont Avenue

Atlanta, GA 30324

Inquiry Number: 4298557.2s

May 19, 2015

The EDR Radius Map™ Report with GeoCheck®



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Shelton, CT 06484
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Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

1582 PIEDMONT AVENUE
ATLANTA, GA 30324

COORDINATES

Latitude (North): 33.7977000 - 33° 47' 51.72"
Longitude (West): 84.3689000 - 84° 22' 8.04"
Universal Transverse Mercator: Zone 16
UTM X (Meters): 743589.2
UTM Y (Meters): 3742644.5
Elevation: 857 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map: 33084-G3 NORTHEAST ATLANTA, GA
Most Recent Revision: 1997

West Map: 33084-G4 NORTHWEST ATLANTA, GA
Most Recent Revision: 1997

AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from: 20100811, 20100905
Source: USDA

MAPPED SITES SUMMARY

Target Property Address:
1582 PIEDMONT AVENUE
ATLANTA, GA 30324

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
A1	VOGUE CLEANERS	1584 PIEDMONT AVE NE	EDR US Hist Cleaners		TP
A2	PIEDMONT AND BOULEVA	1572 PIEDMONT AVE NE	EDR US Hist Auto Stat	Higher	36, 0.007, SSE
A3	CLARK LAUNDRY AND DR	1572 PIEDMONT AVE NE	EDR US Hist Cleaners	Higher	36, 0.007, SSE
A4	CLARK LAUNDRY AND DR	1572 PIEDMONT AVE	UST, DRYCLEANERS, Financial Assurance	Higher	36, 0.007, SSE
A5	ANSLEY MALL EXXON	1570 PIEDMONT AVE NE	EDR US Hist Auto Stat	Higher	37, 0.007, SSE
A6	ANSLEY MALL EXXON SH	1570 MONROE DR NE	EDR US Hist Auto Stat	Lower	39, 0.007, WSW
A7	EXXON FOOD STORE	1570 MONROE DR NE	LUST, UST, Financial Assurance	Lower	39, 0.007, WSW
A8	EXXON CO USA 45283	1570 MONROE DR	RCRA-CESQG, FINDS	Lower	39, 0.007, WSW
A9	METROPOLITAN CLEANER	1579 MONROE DRIVE NE	DRYCLEANERS	Lower	40, 0.008, SSW
A10	METROPOLITAN CLEANER	1579 MONROE DR NE #	DRYCLEANERS	Lower	40, 0.008, SSW
A11	METROPOLITAN CLEANER	1579 MONROE DR NE	RCRA NonGen / NLR, FINDS	Lower	40, 0.008, SSW
A12	METROPOLITAN CLEANER	1579 MONROE DR NE	EDR US Hist Cleaners	Lower	40, 0.008, SSW
A13	JOHNSON JAKE GARAGE	1564 MONROE DR NE	EDR US Hist Auto Stat	Lower	48, 0.009, SW
B14	PRICE S GULF SERVICE	1551 PIEDMONT AVE NE	EDR US Hist Auto Stat	Lower	206, 0.039, SSW
B15	WHITE SPOT CLEANING	1552 PIEDMONT AVE NE	EDR US Hist Cleaners	Lower	255, 0.048, SSW
B16	WOOD S SERVICE STATI	1539 PIEDMONT AVE NE	EDR US Hist Auto Stat	Lower	273, 0.052, SSW
B17	ANSLEY MALL SHELL	1539 PIEDMONT AVE NE	LUST, UST, Financial Assurance	Lower	273, 0.052, SSW
18	PIEDMONT MONROE LAUN	1610 PIEDMONT AVE NE	EDR US Hist Cleaners	Higher	287, 0.054, NNE
B19	MARRERO S AUTOMATIC	1535 PIEDMONT AVE NE	EDR US Hist Cleaners	Lower	295, 0.056, SSW
B20	KNIGHT LAUNDRY AND C	1550 PIEDMONT AVE NE	EDR US Hist Cleaners	Lower	297, 0.056, SSW
B21	JOHNSON JAKE GARAGE	1548 PIEDMONT AVE NE	EDR US Hist Auto Stat	Lower	339, 0.064, SSW
B22	ELROD ALIGNMENT CENT	1546 PIEDMONT AVE NE	EDR US Hist Auto Stat	Lower	347, 0.066, SSW
B23	SUTTON S SPECIALIZED	1546 PIEDMUT AVENUE	EDR US Hist Auto Stat	Lower	377, 0.071, SSW
B24	LAUNDRY LOUNGE RAYMO	1544 PIEDMONT AVE NE	EDR US Hist Cleaners	Lower	383, 0.073, SSW
B25	ANSLEY MALL CLEANERS	1544 PIEDMONT RD NE	DRYCLEANERS	Lower	383, 0.073, SSW
B26	CVS PHARMACY #4747	1544 PIEDMONT AVE. N	RCRA-LQG, FINDS	Lower	383, 0.073, SSW
B27	LAUNDRY LOUNGE	1544 PIEDMONT RD NE	DRYCLEANERS	Lower	383, 0.073, SSW
B28	ANSLEY MALL CLEANERS	1544 PIEDMONT AVENUE	SPILLS, DRYCLEANERS	Lower	383, 0.073, SSW
B29	LAYNDRY LOUNGE INC.	1544 PIEDMONT AVENUE	DRYCLEANERS	Lower	383, 0.073, SSW
30		1616 PIEDMONT AVE N	EDR US Hist Auto Stat	Lower	405, 0.077, NNW
C31	ANSLEY MALL CLEANERS	1544 PIEDMONT RD	RCRA-CESQG	Lower	458, 0.087, SSE
C32	ANSLEY MALL SHOPPING	PIEDMONT AVE. @ MONR	GA NON-HSI	Lower	491, 0.093, SSE
C33	MARTA LINDBERGH PARC	BEHIND 2634 & 2642 P	GA NON-HSI	Higher	561, 0.106, SE
D34	RITE AID # 11794	1512 PIEDMONT AVE	RCRA NonGen / NLR	Lower	745, 0.141, SSW
35	BEST CLEANERS	1507 MONROE DRIVE	DRYCLEANERS	Lower	748, 0.142, SSE
D36		1510 PIEDMONT RD NE	EDR US Hist Cleaners	Lower	754, 0.143, SSW
D37	WEST DISTRIBUTOR SAL	1491 PIEDMONT AVE NE	LUST, UST, Financial Assurance	Higher	844, 0.160, SSW
E38	ANSLEY MALL STANDARD	1676 MONROE DR NE	EDR US Hist Auto Stat	Lower	1034, 0.196, NW
E39	NORMAN & NORMAN ONE	1684 MONROE DR NE	RCRA NonGen / NLR, FINDS	Higher	1254, 0.237, NW

MAPPED SITES SUMMARY

Target Property Address:
 1582 PIEDMONT AVENUE
 ATLANTA, GA 30324

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
E40	ONE HOUR MARTINIZING	1684 MONROE DR NE	EDR US Hist Cleaners	Higher	1254, 0.237, NW
E41	NORMAN AND NORMAN CL	1684 MONROE DRIVE	DRYCLEANERS	Higher	1254, 0.237, NW
42	FASHIONAID DRY CLEAN	1433 PIEDMONT AVENUE	GA NON-HSI	Higher	1577, 0.299, SW
43	ANSLEY GOLF CLUB	196 MONTGOMERY FERRY	FINDS, LUST, UST, Financial Assurance	Lower	2216, 0.420, WNW
44	ABANDONED INDUSTRIAL	586 WORCHESTER DR	LUST, UST, Financial Assurance	Lower	2393, 0.453, South
45	AMSTERDAM WALK	500 AMSTERDAM AVENUE	GA NON-HSI	Lower	3327, 0.630, South
46	VACANT LOT	NW CORNER OF PEACHTR	GA NON-HSI	Higher	5183, 0.982, WSW
47	BMTS/LIDDELL SATELLI	2061 LIDDELL DR NW	GA NON-HSI, LUST, UST, Financial Assurance	Higher	5235, 0.991, NNE

EXECUTIVE SUMMARY

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following records. For more information on this property see page 8 of the attached EDR Radius Map report:

<u>Site</u>	<u>Database(s)</u>	<u>EPA ID</u>
VOGUE CLEANERS 1584 PIEDMONT AVE NE ATLANTA, GA	EDR US Hist Cleaners	N/A

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

STANDARD ENVIRONMENTAL RECORDS

Federal NPL site list

NPL..... National Priority List
Proposed NPL..... Proposed National Priority List Sites
NPL LIENS..... Federal Superfund Liens

Federal Delisted NPL site list

Delisted NPL..... National Priority List Deletions

Federal CERCLIS list

CERCLIS..... Comprehensive Environmental Response, Compensation, and Liability Information System
FEDERAL FACILITY..... Federal Facility Site Information listing

Federal CERCLIS NFRAP site List

CERC-NFRAP..... CERCLIS No Further Remedial Action Planned

Federal RCRA CORRACTS facilities list

CORRACTS..... Corrective Action Report

Federal RCRA non-CORRACTS TSD facilities list

RCRA-TSDF..... RCRA - Treatment, Storage and Disposal

Federal RCRA generators list

RCRA-SQG..... RCRA - Small Quantity Generators

EXECUTIVE SUMMARY

Federal institutional controls / engineering controls registries

US ENG CONTROLS..... Engineering Controls Sites List
US INST CONTROL..... Sites with Institutional Controls
LUCIS..... Land Use Control Information System

Federal ERNS list

ERNS..... Emergency Response Notification System

State- and tribal - equivalent CERCLIS

SHWS..... Hazardous Site Inventory

State and tribal landfill and/or solid waste disposal site lists

SWF/LF..... Solid Waste Disposal Facilities

State and tribal leaking storage tank lists

INDIAN LUST..... Leaking Underground Storage Tanks on Indian Land

State and tribal registered storage tank lists

AST..... Above Ground Storage Tanks
INDIAN UST..... Underground Storage Tanks on Indian Land
FEMA UST..... Underground Storage Tank Listing

State and tribal institutional control / engineering control registries

AUL..... Uniform Environmental Covenants
INST CONTROL..... Public Record List

State and tribal voluntary cleanup sites

INDIAN VCP..... Voluntary Cleanup Priority Listing
VCP..... Voluntary Cleanup Program site

State and tribal Brownfields sites

BROWNFIELDS..... Brownfields Public Record List

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS..... A Listing of Brownfields Sites

Local Lists of Landfill / Solid Waste Disposal Sites

ODI..... Open Dump Inventory
DEBRIS REGION 9..... Torres Martinez Reservation Illegal Dump Site Locations
SWRCY..... Recycling Center Listing

EXECUTIVE SUMMARY

HIST LF..... Historical Landfills
INDIAN ODI..... Report on the Status of Open Dumps on Indian Lands

Local Lists of Hazardous waste / Contaminated Sites

US CDL..... Clandestine Drug Labs
DEL SHWS..... Delisted Hazardous Site Inventory Listing
CDL..... Clandestine Drug Labs
US HIST CDL..... National Clandestine Laboratory Register

Local Land Records

LIENS 2..... CERCLA Lien Information

Records of Emergency Release Reports

HMIRS..... Hazardous Materials Information Reporting System
SPILLS..... Spills Information
SPILLS 90..... SPILLS 90 data from FirstSearch

Other Ascertainable Records

DOT OPS..... Incident and Accident Data
DOD..... Department of Defense Sites
FUDS..... Formerly Used Defense Sites
CONSENT..... Superfund (CERCLA) Consent Decrees
ROD..... Records Of Decision
UMTRA..... Uranium Mill Tailings Sites
US MINES..... Mines Master Index File
TRIS..... Toxic Chemical Release Inventory System
TSCA..... Toxic Substances Control Act
FTTS..... FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
HIST FTTS..... FIFRA/TSCA Tracking System Administrative Case Listing
SSTS..... Section 7 Tracking Systems
ICIS..... Integrated Compliance Information System
PADS..... PCB Activity Database System
MLTS..... Material Licensing Tracking System
RADINFO..... Radiation Information Database
FINDS..... Facility Index System/Facility Registry System
RAATS..... RCRA Administrative Action Tracking System
RMP..... Risk Management Plans
NPDES..... NPDES Wastewater Permit List
AIRS..... Permitted Facility and Emissions Listing
TIER 2..... Tier 2 Data Listing
INDIAN RESERV..... Indian Reservations
SCRD DRYCLEANERS..... State Coalition for Remediation of Drycleaners Listing
COAL ASH..... Coal Ash Disposal Site Listing
Financial Assurance..... Financial Assurance Information Listing
COAL ASH EPA..... Coal Combustion Residues Surface Impoundments List
PCB TRANSFORMER..... PCB Transformer Registration Database
COAL ASH DOE..... Steam-Electric Plant Operation Data
2020 COR ACTION..... 2020 Corrective Action Program List
PRP..... Potentially Responsible Parties
LEAD SMELTERS..... Lead Smelter Sites

EXECUTIVE SUMMARY

EPA WATCH LIST..... EPA WATCH LIST
US FIN ASSUR..... Financial Assurance Information
US AIRS..... Aerometric Information Retrieval System Facility Subsystem

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP..... EDR Proprietary Manufactured Gas Plants

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA LUST..... Recovered Government Archive Leaking Underground Storage Tank
RGA HWS..... Recovered Government Archive State Hazardous Waste Facilities List
RGA LF..... Recovered Government Archive Solid Waste Facilities List

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified in the following databases.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property.

Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

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

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

STANDARD ENVIRONMENTAL RECORDS

Federal RCRA generators list

RCRA-LQG: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

A review of the RCRA-LQG list, as provided by EDR, and dated 12/09/2014 has revealed that there is 1 RCRA-LQG site within approximately 0.25 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>CVS PHARMACY #4747</i>	<i>1544 PIEDMONT AVE. N</i>	<i>SSW 0 - 1/8 (0.073 mi.)</i>	<i>B26</i>	<i>32</i>

EXECUTIVE SUMMARY

RCRA-CESQG: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

A review of the RCRA-CESQG list, as provided by EDR, and dated 12/09/2014 has revealed that there are 2 RCRA-CESQG sites within approximately 0.25 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
EXXON CO USA 45283	1570 MONROE DR	WSW 0 - 1/8 (0.007 mi.)	A8	15
ANSLEY MALL CLEANERS	1544 PIEDMONT RD	SSE 0 - 1/8 (0.087 mi.)	C31	45

State- and tribal - equivalent CERCLIS

GA NON-HSI: Georgia Non Hazardous Site Inventory Sites.

A review of the GA NON-HSI list, as provided by EDR, and dated 03/31/2015 has revealed that there are 6 GA NON-HSI sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
MARTA LINDBERGH PARC	BEHIND 2634 & 2642 P	SE 0 - 1/8 (0.106 mi.)	C33	47
FASHIONAID DRY CLEAN	1433 PIEDMONT AVENUE	SW 1/4 - 1/2 (0.299 mi.)	42	62
VACANT LOT	NW CORNER OF PEACHTR	WSW 1/2 - 1 (0.982 mi.)	46	65
BMTS/LIDDELL SATELLI	2061 LIDDELL DR NW	NNE 1/2 - 1 (0.991 mi.)	47	66
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
ANSLEY MALL SHOPPING	PIEDMONT AVE. @ MONR	SSE 0 - 1/8 (0.093 mi.)	C32	47
AMSTERDAM WALK	500 AMSTERDAM AVENUE	S 1/2 - 1 (0.630 mi.)	45	65

State and tribal leaking storage tank lists

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

A review of the LUST list, as provided by EDR, and dated 07/02/2014 has revealed that there are 5 LUST sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
WEST DISTRIBUTOR SAL	1491 PIEDMONT AVE NE	SSW 1/8 - 1/4 (0.160 mi.)	D37	51
Cleanup Status: NFA - No Further Action Facility Id: 00600860				
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
EXXON FOOD STORE	1570 MONROE DR NE	WSW 0 - 1/8 (0.007 mi.)	A7	13
Cleanup Status: NFA - Monitoring Only (MNA) Facility Id: 00601133				
ANSLEY MALL SHELL	1539 PIEDMONT AVE NE	SSW 0 - 1/8 (0.052 mi.)	B17	25
Cleanup Status: NFA - No Further Action Cleanup Status: In Remediation Cleanup Status: NFA - Suspected Release Facility Id: 00600781				

EXECUTIVE SUMMARY

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
ANSLEY GOLF CLUB Cleanup Status: NFA - No Further Action Facility Id: 09000753	196 MONTGOMERY FERRY	WNW 1/4 - 1/2 (0.420 mi.)	43	62
ABANDONED INDUSTRIAL Cleanup Status: NFA - No Further Action Facility Id: 09060301	586 WORCHESTER DR	S 1/4 - 1/2 (0.453 mi.)	44	64

State and tribal registered storage tank lists

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

A review of the UST list, as provided by EDR, and dated 07/01/2013 has revealed that there are 4 UST sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
CLARK LAUNDRY AND DR Facility Id: 9060251 Status: Removed From Ground Status: Installed Status: Upgrade Repair Not Marked Facility Status: Closed	1572 PIEDMONT AVE	SSE 0 - 1/8 (0.007 mi.)	A4	9
WEST DISTRIBUTOR SAL Facility Id: 600860 Status: Installed Status: Removed From Ground Status: Upgrade Repair Not Marked Facility Status: Closed	1491 PIEDMONT AVE NE	SSW 1/8 - 1/4 (0.160 mi.)	D37	51

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
EXXON FOOD STORE Facility Id: 601133 Status: Currently In Use Status: Installed Facility Status: Active	1570 MONROE DR NE	WSW 0 - 1/8 (0.007 mi.)	A7	13
ANSLEY MALL SHELL Facility Id: 600781 Status: Currently In Use Status: Installed Status: Cathodically Prot Status: Temporarily Out Of Use Facility Status: Active	1539 PIEDMONT AVE NE	SSW 0 - 1/8 (0.052 mi.)	B17	25

EXECUTIVE SUMMARY

ADDITIONAL ENVIRONMENTAL RECORDS

Other Ascertainable Records

RCRA NonGen / NLR: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

A review of the RCRA NonGen / NLR list, as provided by EDR, and dated 12/09/2014 has revealed that there are 3 RCRA NonGen / NLR sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>NORMAN & NORMAN ONE</i>	<i>1684 MONROE DR NE</i>	<i>NW 1/8 - 1/4 (0.237 mi.)</i>	<i>E39</i>	<i>53</i>
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>METROPOLITAN CLEANER</i> RITE AID # 11794	<i>1579 MONROE DR NE</i> 1512 PIEDMONT AVE	<i>SSW 0 - 1/8 (0.008 mi.)</i> SSW 1/8 - 1/4 (0.141 mi.)	<i>A11</i> D34	<i>20</i> <i>47</i>

DRYCLEANERS: A list of drycleaners in the state. The listing includes drycleaner facilities, that use perchloroethylene, that responded to the Notification of Compliance Status forms. It also includes those businesses that are pick-up stores only and do not conduct dry cleaning on site.

A review of the DRYCLEANERS list, as provided by EDR, and dated 12/22/2014 has revealed that there are 9 DRYCLEANERS sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>CLARK LAUNDRY AND DR</i> NORMAN AND NORMAN CL	<i>1572 PIEDMONT AVE</i> 1684 MONROE DRIVE	<i>SSE 0 - 1/8 (0.007 mi.)</i> NW 1/8 - 1/4 (0.237 mi.)	<i>A4</i> E41	<i>9</i> <i>56</i>
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
METROPOLITAN CLEANER	1579 MONROE DRIVE NE	SSW 0 - 1/8 (0.008 mi.)	A9	17
METROPOLITAN CLEANER	1579 MONROE DR NE #	SSW 0 - 1/8 (0.008 mi.)	A10	19
ANSLEY MALL CLEANERS	1544 PIEDMONT RD NE	SSW 0 - 1/8 (0.073 mi.)	B25	31
LAUNDRY LOUNGE	1544 PIEDMONT RD NE	SSW 0 - 1/8 (0.073 mi.)	B27	39
<i>ANSLEY MALL CLEANERS</i>	<i>1544 PIEDMONT AVENUE</i>	<i>SSW 0 - 1/8 (0.073 mi.)</i>	<i>B28</i>	<i>41</i>
LAYNDRY LOUNGE INC.	1544 PIEDMONT AVENUE	SSW 0 - 1/8 (0.073 mi.)	B29	43
BEST CLEANERS	1507 MONROE DRIVE	SSE 1/8 - 1/4 (0.142 mi.)	35	49

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR US Hist Auto Stat: EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR

EXECUTIVE SUMMARY

researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

A review of the EDR US Hist Auto Stat list, as provided by EDR, has revealed that there are 11 EDR US Hist Auto Stat sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
PIEDMONT AND BOULEVA	1572 PIEDMONT AVE NE	SSE 0 - 1/8 (0.007 mi.)	A2	8
ANSLEY MALL EXXON	1570 PIEDMONT AVE NE	SSE 0 - 1/8 (0.007 mi.)	A5	12
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
ANSLEY MALL EXXON SH	1570 MONROE DR NE	WSW 0 - 1/8 (0.007 mi.)	A6	12
JOHNSON JAKE GARAGE	1564 MONROE DR NE	SW 0 - 1/8 (0.009 mi.)	A13	23
PRICE S GULF SERVICE	1551 PIEDMONT AVE NE	SSW 0 - 1/8 (0.039 mi.)	B14	23
WOOD S SERVICE STATI	1539 PIEDMONT AVE NE	SSW 0 - 1/8 (0.052 mi.)	B16	24
JOHNSON JAKE GARAGE	1548 PIEDMONT AVE NE	SSW 0 - 1/8 (0.064 mi.)	B21	28
ELROD ALIGNMENT CENT	1546 PIEDMONT AVE NE	SSW 0 - 1/8 (0.066 mi.)	B22	29
SUTTON S SPECIALIZED	1546 PIEDMUT AVENUE	SSW 0 - 1/8 (0.071 mi.)	B23	29
Not reported	1616 PIEDMONT AVE N	NNW 0 - 1/8 (0.077 mi.)	30	45
ANSLEY MALL STANDARD	1676 MONROE DR NE	NW 1/8 - 1/4 (0.196 mi.)	E38	53

EDR US Hist Cleaners: EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

A review of the EDR US Hist Cleaners list, as provided by EDR, has revealed that there are 9 EDR US Hist Cleaners sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
CLARK LAUNDRY AND DR	1572 PIEDMONT AVE NE	SSE 0 - 1/8 (0.007 mi.)	A3	8
PIEDMONT MONROE LAUN	1610 PIEDMONT AVE NE	NNE 0 - 1/8 (0.054 mi.)	18	28
ONE HOUR MARTINIZING	1684 MONROE DR NE	NW 1/8 - 1/4 (0.237 mi.)	E40	54
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
METROPOLITAN CLEANER	1579 MONROE DR NE	SSW 0 - 1/8 (0.008 mi.)	A12	22
WHITE SPOT CLEANING	1552 PIEDMONT AVE NE	SSW 0 - 1/8 (0.048 mi.)	B15	24
MARRERO S AUTOMATIC	1535 PIEDMONT AVE NE	SSW 0 - 1/8 (0.056 mi.)	B19	28
KNIGHT LAUNDRY AND C	1550 PIEDMONT AVE NE	SSW 0 - 1/8 (0.056 mi.)	B20	28
LAUNDRY LOUNGE RAYMO	1544 PIEDMONT AVE NE	SSW 0 - 1/8 (0.073 mi.)	B24	29
Not reported	1510 PIEDMONT RD NE	SSW 1/8 - 1/4 (0.143 mi.)	D36	51