Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, SE, Suite 1154, Atlanta, Georgia 30334
Chris Clark, Commissioner
Environmental Protection Division
F. Allen Barnes, Director
404/656-2833

July 30, 2010

VIA MAIL COURIER

Ms. Donna Seadler
Superfund Site Assessment Manager
U.S. Environmental Protection Agency
Waste Management Division
Superfund Site Evaluation Section
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104

Site: Cascade Springs Cleaners
Break: 1.8
Other: v.1

RE: Cascade Springs Dry Cleaner
Atlanta, Fulton County, Georgia
Pre-CERCLIS Screening Assessment

Dear Ms. Seadler:

Enclosed you will find a Pre-CERCLIS Screening Assessment (PSA) report that has been completed for the above referenced site. Should you have any questions or comments regarding the PSA report, please contact Mr. Lawrence Papetti at (404) 657-0486.

Sincerely,

Andrew S. Taft

Andrew S. Taft
CERCLA Site Assessment Coordinator
Hazardous Waste Management Branch

cc: David Brownlee, EPD (w/o enclosure)
Lawrence Papetti, EPD (w/o enclosure)

File: CERCLA Pre-Remedial (FY-2010)
s:\rdrive\andy\pa-si\07-30-10-2.ltr.doc

10785543

PRE-CERCLIS SCREENING ASSESSMENT

CASCADE SPRINGS CLEANER SITE
1160 UTOY SPRINGS ROAD
ATLANTA, FULTON COUNTY, GEORGIA

PREPARED FOR:

U.S ENVIRONMENTAL PROTECTION AGENCY
ATLANTA FEDERAL BUILDING
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303

PREPARED BY:

LAWRENCE PAPETTI, GEOLOGIST 3
GEORGIA DEPT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION
2 MARTIN LUTHER KING JR. DRIVE, SE
FLOYD TOWER EAST, SUITE 1154
ATLANTA, GEORGIA 30334

June 2010

REVIEWED BY:

ANDREW S. TAFT
CERCLA SITE ASSESSMENT COORDINATOR

TABLE OF CONTENTS
PRE-CERCLIS SCREENING ASSESSMENT
Cascade Springs Cleaner Site
Atlanta, Fulton County, GA
EPA ID No.: Not Applicable

NARRATIVE
1.0 INTRODUCTION
2.0 SITE DESCRIPTION, OPERATIONAL HISTORY AND WASTE CHARACTERISTICS
- 2.1 Site Location
- 2.2 Site Description
- 2.3 Operational History and Waste Characteristics
  - 2.3.1 Operational History
  - 2.3.2 Waste Characteristics

3.0 GROUNDWATER MIGRATION PATHWAY
4.0 SURFACE WATER MIGRATION PATHWAY
- 4.1 Hydrologic Setting
  - 4.1.1 Overland Run-Off Route
  - 4.1.2 Target Distance Limit
- 4.2 Surface Water Targets
  - 4.2.1 Drinking Water Threat
  - 4.2.2 Human Food Chain Threat
  - 4.2.3 Environmental Threat
- 4.3 Surface Water Migration Pathway Conclusions

5.0 SOIL EXPOSURE AND AIR MIGRATION PATHWAYS
6.0 SUMMARY AND CONCLUSIONS

REFERENCES

FIGURES:
Figure 1 – Topographic Map
Figure 2 – Site Map
Figure 3 – Wetlands map showing the Overland Run-off Route (OROR), the Probable Point of Entry (PPE) of overland run-off into a perennial surface water body, and the first two miles of the surface water Target Distance Limit (TDL).

APPENDICES:
Appendix A: Trip Report by Lawrence Papetti (Ref. 3)
Appendix B: Selected References

PRE-CERCLIS SCREENING ASSESSMENT
Cascade Springs Cleaner Site
Atlanta, Fulton County, GA
EPA ID No.: Not Applicable

1.0 INTRODUCTION

Under the authority of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), the Environmental Protection Division (GAEPD) of the Georgia Department of Natural Resources (GADNR) conducted a Pre-Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Screening Assessment (PSA) of the Cascade Springs Cleaner facility, located in Atlanta, Fulton County, Georgia, using the *Hazard Ranking System* (HRS) as the evaluating tool and the EPA Region 4 Pre-CERCLIS Screening Assessment Guidance Manual as a guide (Refs.1, 2).

The scope of this PSA consisted of the review of available documentation on file, an on-site reconnaissance conducted on June 24, 2010 and an evaluation of the Surface Water Pathway (Ref. 3). The Trip Report is included as Appendix A (Ref. 3). This PSA solely evaluated the Environmental Threat of the Surface Water Pathway, because there is sufficient existing information to recommend that the site be included into CERCLIS based solely on such evaluation.

2.0 SITE DESCRIPTION, OPERATIONAL HISTORY AND WASTE CHARACTERISTICS

2.1 Site Location

The Cascade Springs Cleaner site is located at 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia (Figure 1, Refs. 3 and 4). A map showing the site location with respect to surrounding properties is included as Figure 2. Hereinafter, the area identified in Figure 2 within the site boundary is referred to as "the site." The site location is also shown on the map included as Figure 3.

Site reconnaissance determined the geographic coordinates of the Site Reference Point as Latitude 33.72246 degrees north, Longitude 84.50632 degrees west (Ref. 3). Figure 2 shows the location of the Site Reference Point. Method Accuracy Description (MAD) data, according to the format requirements of the Environmental Protection Agency's *Quick Reference Guide, Entering Latitude/Longitude Data* and based on field data, are as follows:

Accuracy: 5.2 meters.

Collection Method: GPS Code (Pseudo Range) Differential (corresponds to use of a recreational grade GPS receiver).

Reference Datum: NAD83 (datum used by GPS receiver).

Reference Point: During site reconnaissance, the investigators established the Site Reference Point as the front door of the facility building (See Attachment D of Ref. 3: Photo 9 of 23). The GAEPD chose this reference point location because it is close to the dry cleaning plant, easily identifiable, and centrally located on the site.

Source Map Scale: None (used GPS receiver)

Verification Method (optional): DOQQ verified using USGS Ben Hill, Georgia 1:24,000 scale topographic quadrangle map, 1954, Photorevised 1982.

Source (optional): Field data.

Point/Line/Area (optional): Not determined.

Measurement Sequence (optional): Not determined.

Collection Date: June 24, 2010.

A search in the CERCLIS database did not identify a listing for any sites on surrounding properties (Ref. 7).

2.2 Site Description

A trip report documenting areas visited, interviews conducted and observations noted during June 24, 2010 site reconnaissance is included as Ref. 3. Photographs are included as Attachment D of Ref. 3. A copy of the logbook documentation for the reconnaissance activities is included as Attachment E of Ref. 3. Hereinafter, the Cascade Springs Cleaner facility building (Figure 2) is referred to as the "facility building."

A gas station is located on the adjacent property east of the Wood and Tompkins Cores Building (identified in Figure 2 as "Existing one-story metal Building") (Ref. 3). A two-story apartment building, currently occupied, is located approximately 40 feet from the facility building on the adjacent property west of the site (See Attachment D of Ref. 3: Photo 11 of 23). A grassy area and Utoy Springs Road are located north of the facility building and Murray Brothers Funeral Home is located across Utoy Springs Road (See Attachment D of Ref. 3: Photo 12 of 23). A dry ditch and a golf driving range named The Cascade Driving Range are located beyond the grass area to the south (See Attachment D of Ref. 3: Photo 15 of 23). Samuel E. Tompkins said he owns the driving range (Ref. 3).

During the June 24, 2010 reconnaissance, the facility operator, Bipen Patel, was present in the Cascade Springs Cleaner facility building (Figure 2) in which he runs a dry cleaning business named, "Cascade Springs Cleaner" (Ref. 3). During the June 24, 2010 reconnaissance, Samuel E. Tompkins was present across the parking lot from the facility

building at his place of business, Wood and Tompkins Cores at 1180 Utoy Springs Road, identified in Figure 2 as "Existing one-story metal Building" (Ref. 3).

A parking lot and an open grass area are located south of the facility building (See Attachment D of Ref. 3: Photo 14 of 23). A parking lot and a one-story metal building containing Wood and Tompkins Cores are located east of the facility building (See Attachment D of Ref. 3: Photos 10 and 13 of 23).

Observations made inside the facility building were as follows (Ref. 3):

- There was a half-full fifty-five (55) gallon drum inside the facility building, containing material identified by owner Bipen Patel as perchloroethylene dry-cleaning machine sludge (See Attachment D of Ref. 3: Photo 1 of 23). Bipen Patel said that a company named MCF routinely picks up the sludge. The drum was unlabeled.

- There was a single dry-cleaning machine in the facility building. Bipen Patel said the machine utilizes perchloroethylene (See Attachment D of Ref. 3: Photo 2 of 23).

- There were several areas of stained concrete on the work floor of the facility building (See Attachment D of Ref. 3: Photos 3-7 of 23).

- There were several containers of materials identified by Bipen Patel as spotting chemicals inside the facility building (See Attachment D of Ref. 3: Photo 8 of 23). Labels identified the following products in these containers: Pyratex grease cutter, Tannaid, Picrin oily spot remover with TCE, CP boiler treatment, Laidlaw silk pre-spotter, Stand By silk spotter, Easy Go spray spotter, Steelex spray spotter, and Pro-line laundry P.O.G.

2.3 Operational History and Waste Characteristics

2.3.1 Operational History

During the June 24, 2010 reconnaissance, Bipen Patel identified himself as the facility operator, and Samuel E. Tompkins identified himself as the facility owner for Cascade Springs Cleaner. The dry cleaning operation is named "Cascade Springs Cleaner" as indicated by the operator Bipen Patel's business card (i.e. not "Cascade Springs *Dry* Cleaner as in the HSI listing discussed below), (Refs. 3 and 6). Accordingly, for the purposes of this investigation, the site name is identified as "Cascade Springs Cleaner."

Site reconnaissance (Ref. 3) identified the dry cleaning operation, drummed perchloroethylene waste, and a stained concrete floor where hazardous substances were detected by XRF to actually be within the facility building at *1160* Utoy Springs Road (i.e. not in the neighboring Wood and Tompkins Cores, Inc. building at 1180 Utoy Springs Road).

Accordingly, for the purposes of this investigation the site address is identified as 1160 Utoy Springs Road.

During reconnaissance, operator Bipen Patel provided information on the dry cleaning operation (Ref. 3). Bipen Patel said the machine utilizes perchloroethylene (See Attachment D of Ref. 3: Photo 2 of 23). Bipen Patel said that a company named MCF routinely picks up the sludge (Ref. 3).

The one-story metal building containing Wood and Tompkins Cores, located east of the facility building, contains a used automotive parts operation, Wood and Tompkins Cores (See Attachment D of Ref. 3: Photos 10 and 13 of 23). Samuel E. Tompkins owns and operates Wood and Tompkins Cores (Ref. 3).

The GAEPD's Hazardous Site Inventory (HSI) lists the site as "Cascade Springs Dry Cleaner" (Site Number 10441) at 1180 Utoy Springs Road, Atlanta, Fulton County, Georgia (Refs. 5 and 6). The GAEPD designates the site as Class I (Ref. 6). At the time of this PSA, the facility is non-compliant with the GAEPD's cleanup requirements set forth in the Georgia Rules for Hazardous Site Response (Refs. 9 and 11). Although the site is listed on the GAEPD's Hazardous Site Inventory (HSI) as Site Number 10441, the GAEPD issued November 7, 2006 Administrative Order EPD-HSR-495 to clean up the site because the owner is unable to perform any additional investigation or cleanup (Ref. 9).

A search in the CERCLIS database did not identify a listing for the site (Ref. 7). GAEPD hazardous waste generator files do not identify a listing for "Cascade Springs Cleaner" or "Cascade Springs Dry Cleaner."

2.3.2 Waste Characteristics

The July 1, 2009 HSI lists tetrachloroethene [a.k.a. perchloroethylene (PCE), and tetrachloroethylene] as a regulated substance in groundwater and soil at the site (Refs. 5 and 6). There was a half-full fifty-five (55) gallon drum inside the facility building, containing material identified by owner Bipen Patel as perchloroethylene dry-cleaning machine sludge (See Attachment D of Ref. 3: Photo 1 of 23). The drum was unlabeled.

The X-Ray Fluorescence analyzer (XRF) allows for the *in situ* screenings of soil, sediment, or waste for a variety of metals. Seven (7) screenings of stains on the concrete floor within the facility building were conducted, clustered in the following three (3) different areas (Ref. 3):

- The area between the dry-cleaning machine and the south exterior wall,
- The area next to the water fountain and vacuum canister (near the northern exterior wall), and
- The area next to the Unipress machine (near the center of the building).

All screenings were conducted in situ (i.e. in place) of the surface of the concrete floor within the facility building (Ref. 3). Standardization readings from a stainless steel clip of known composition were taken before any sample screening was conducted (Ref. 3). A table of the XRF results is included as Attachment F of Ref. 3: XRF Data. All concentrations are expressed in milligrams-per-kilogram (mg/kg). The results of the XRF screenings are as follows (Ref. 3):

- Metals that were not detected above the associated reporting limit/Limit of Detection (LOD) in any of the seven (7) screenings consist of (highest LOD in parentheses): cobalt (2,027 mg/kg), selenium (59 mg/kg), silver (224 mg/kg), cadmium (282 mg/kg), antimony (571 mg/kg), and mercury (937 mg/kg).

- Metals that were detected in at least one of the screenings, with the highest concentration detected shown in parenthesis, were: titanium (57,986 mg/kg), chromium (316 mg/kg), manganese (325 mg/kg), iron (55,272 mg/kg), nickel (103 mg/kg), copper (6,622 mg/kg), zinc (2,500,146 mg/kg), arsenic (88 mg/kg), rubidium (207 mg/kg), strontium (279 mg/kg), zirconium (305 mg/kg), molybdenum (705 mg/kg), tin (332 mg/kg), barium (7,935 mg/kg), and lead (583 mg/kg).

Accordingly, for the purposes of this PSA the following are considered areas where a hazardous substance has been deposited, stored, disposed, or placed, plus those soils that have become contaminated from hazardous substance migration:

- PCE-contaminated on-site soil identified in the HSI listing (Ref. 6),

- An unlabeled drum containing PCE sludge inside the facility building identified during reconnaissance (Ref. 3),

- A container of Picrin oily spot remover with TCE inside the facility building identified during reconnaissance (Ref. 3), and

- The stained concrete floor within the facility building, where hazardous substances were detected by XRF during reconnaissance (Ref. 3).

3.0 GROUNDWATER MIGRATION PATHWAY

The Groundwater Migration Pathway was not evaluated, because there is sufficient existing information to recommend that the site be included into CERCLIS based solely on the evaluation of the Surface Water Pathway.

4.0 SURFACE WATER MIGRATION PATHWAY

4.1 Hydrologic Setting

The site hydrology is part of the Chattahoochee River basin (Ref. 4). The site-specific hydrologic setting is sub-divided into the Overland Run-off Route (Overland Segment) and the Surface Water Target Distance Limit (In-Water Segment) as follows:

4.1.1 Overland Run-off Route

The Overland Run-Off Route (OROR) is the migration route that run-off would follow from a particular on-site source to a perennial surface water body (Ref. 1). Further, any point at which site run-off enters a perennial surface water body is considered a Probable Point of Entry (PPE). Figures 2 and 3 show the OROR.

Site run-off from the facility building flows southward over the parking lot, across the open grass area, to a ditch located approximately 250 feet from the facility building (Figure 2, Ref. 3). Run-off continues approximately 900 feet north northwestward through the ditch (which runs beneath overhead power transmission lines), underneath Cascade Road and Research Center Atlanta Drive, to the ditch's terminus in South Utoy Creek (Ref. 3). The ditch was dry at the time of reconnaissance (See Attachment D of Ref. 3: Photo 15 of 23).

4.1.2 Target Distance Limit

The surface water Target Distance Limit (TDL) is the migration route that site generated run-off would follow from the point it enters a perennial surface water body, i.e., the PPE, to a point fifteen (15) miles down-stream from the PPE (Refs. 1, 2). The coordinates of the confluence of the ditch (receiving site run-off) into South Utoy Creek are Latitude 33.72494 degrees north, Longitude 84.50575 degrees west, with an accuracy of 11 feet (See Attachment D of Ref. 3: Photo 16-19 of 23). For the purposes of this PSA, this point is identified as the PPE.

Reconnaissance observations and interviews provided the following information supporting perennial conditions at and downstream of the PPE (Ref. 3):

- The investigator observed South Utoy Creek, North Utoy Creek, and Utoy Creek at its head to be flowing and to have a sandy substrate (See Attachment D of Ref. 3: Photos 20, 21, and 23 of 23).

- Samuel E. Tompkins of Wood and Tompkins Cores said that he has never seen South Utoy Creek run dry.

- Leon Benton of Leon Benton Construction, who said his property adjoins the confluence of North Utoy Creek and South Utoy Creek, said that he has seen these streams run to a trickle but not dry up before. Leon Benton said that he has operated Leon Benton Construction at that location since 1977.

The investigator observed surface water, beginning at the PPE, to flow along the following route (Ref. 3):

- Through South Utoy Creek a distance of approximately 3,300 feet northwestward to the confluence with North Utoy Creek.

- Through Utoy Creek downstream (northwest) of the confluence of North Utoy Creek and South Utoy Creek a distance of approximately 5,000 feet. Utoy Creek continues to the northwest beyond the area of reconnaissance (Figure 3).

4.2 Surface Water Targets

Targets associated with the drinking water, the human food chain and the sensitive environment threats were evaluated as follows:

4.2.1 Drinking Water Threat

The Drinking Water Threat was not evaluated, because there is sufficient existing information to recommend that the site be included into CERCLIS based solely on the evaluation of the Environmental Threat.

4.2.2 Human Food Chain Threat

The Human Food Chain Threat was not evaluated, because there is sufficient existing information to recommend that the site be included into CERCLIS based solely on the evaluation of the Environmental Threat.

4.2.3 Environmental Threat

Wetlands digital data from the U.S. Fish and Wildlife Service identify approximately 0.2 miles of freshwater forested/shrub wetland frontage between 0.5 and 0.7 miles downstream of the PPE, and approximately 0.4 miles of freshwater forested/shrub wetland frontage in the first two miles of the TDL (Refs 3 and 8). Figure 3 identifies these areas. The investigator observed all of the areas identified as freshwater forested/shrub wetlands in Figure 3 to be undeveloped (See Attachment D of Ref. 3: Photos 17-23 of 23). Freshwater forested/shrub wetlands are considered HRS-qualifying wetlands (Highlight A-8 of Ref. 10).

4.3 Surface Water Migration Pathway Conclusions

The Drinking Water and Human Food Chain Threats were not evaluated, because there is sufficient existing information to recommend that the site be included into CERCLIS based solely on the evaluation of the Environmental Threat.

For the purposes of this PSA, a release of hazardous substances from the site to surface water in South Utoy Creek and Utoy Creek is assumed. For the purposes of this PSA, it is suspected that surface water targets located within the site-specific 15-mile TDL have been

impacted by a release of hazardous substances from the site to surface water based on the following conditions in the TDL:

- **Nearby Wetlands:** HRS-qualifying wetland frontage, considered "nearby" for the purposes of this PSA, is as follows (Refs. 3, 8, and 10):
    - Approximately 0.2 miles of HRS-qualifying wetland frontage located between 0.5 and 0.7 miles downstream of the PPE along South Utoy Creek and Utoy Creek.
    - Approximately 0.4 miles of HRS-qualifying wetland frontage located in the first two miles of the TDL along South Utoy Creek and Utoy Creek.
- **Chromium:** Of the hazardous substances detected on site during XRF screening, chromium has a very high ecotoxicity value, representing a threat to Wetlands and sensitive environments (SCDM). HRS-qualifying wetlands that are suspected to have been affected by these hazardous substances exist along South Utoy Creek and Utoy Creek as close as 0.5 mile downstream of the PPE (Refs. 3, 8, and 10).

In conclusion, the threat to sensitive environments by itself warrants further evaluation of the site under the Hazard Ranking System (HRS).

5.0 SOIL EXPOSURE AND AIR MIGRATION PATHWAYS

The Soil Exposure and Air Migration Pathways were not evaluated, because there is sufficient existing information to recommend that the site be included into CERCLIS based solely on the evaluation of the Surface Water Pathway.

6.0 SUMMARY AND CONCLUSIONS

Based upon available information and current site conditions, the site is recommended as a candidate for inclusion to the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) and for subsequent evaluation under the HRS. The threat to sensitive environments in the Surface Water Pathway by itself warrants further evaluation of the site under the Hazard Ranking System (HRS).

PRE-CERCLIS SCREENING ASSESSMENT
Cascade Springs Cleaner Site
Atlanta, Fulton County, GA
EPA ID No.: Not Applicable

LIST OF REFERENCES

1. Federal Register, 40CFR Chapter 1 Subchapter J Part 300 Subpart L-Appendix A, Hazard Ranking System, Final Rule, December 14, 1990
2. United States Environmental Protection Agency, Region 4 Superfund Evaluation Section Publication: Pre-CERCLIS Screening Assessment-Guidance Manual, August, 2006
3. Papetti, Lawrence, July 30, 2010, Trip Report for Field Reconnaissance conducted on June 24, 2010 (Appendix A)
4. U.S. Department of the Interior, Geologic Survey, 7.5' Series Topographic Map, Ben Hill Quadrangle, 1954 (Photorevised 1982), GA, Scale 1:24000
5. Georgia Environmental Protection Division, Output from Reportable Quantities Screening Method (RQSM), Cascade Springs Dry Cleaner, HSI Site No. 10441, April 10, 2001
6. Georgia Environmental Protection Division, Hazardous Site Inventory, July 1, 2009, Site Number 10441, Site Summary
7. United States Environmental Protection Agency, Superfund Information Systems, CERCLIS Database accessed on June 14, 2010 @ www.epa.gov/superfund/sites/cursites/
8. U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Digital Data, accessed on June 10, 2010 @ http://www.fws.gov/nwi/
9. Couch, Carol A., Director, GA EPD, November 7, 2006, Administrative Order No. EPD-HSR-495, Cascade Springs Dry Cleaner, HSI Site No. 10441
10. U.S. Environmental Protection Agency, 1992, Hazard Ranking System Guidance Manual, EPA 540-R-92-026.
11. Cleary, Alexandra Y., Program Manager, GA EPD Response and Remediation Program (RRP), August 2, 2010, personal conversation

FIGURES

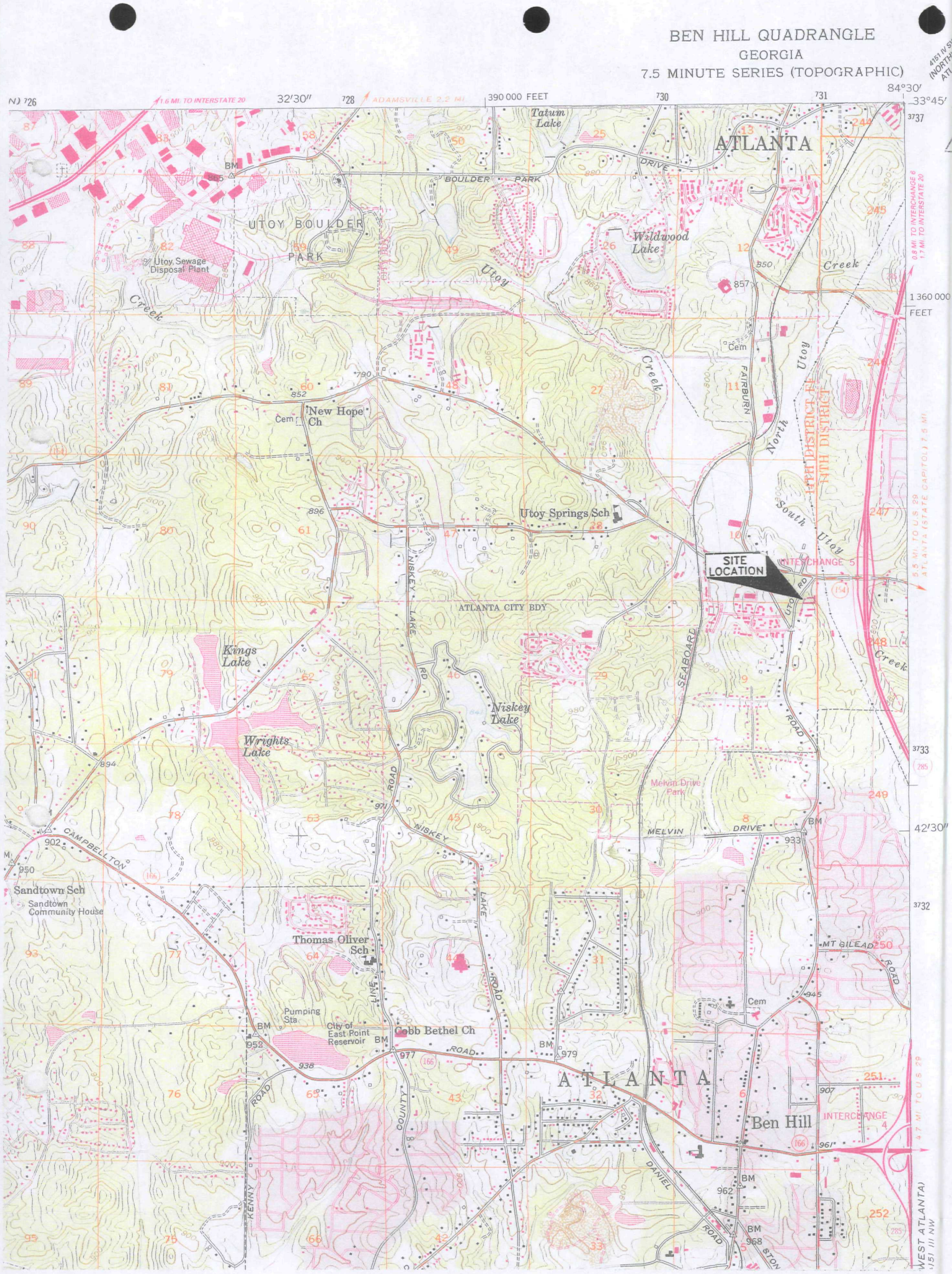
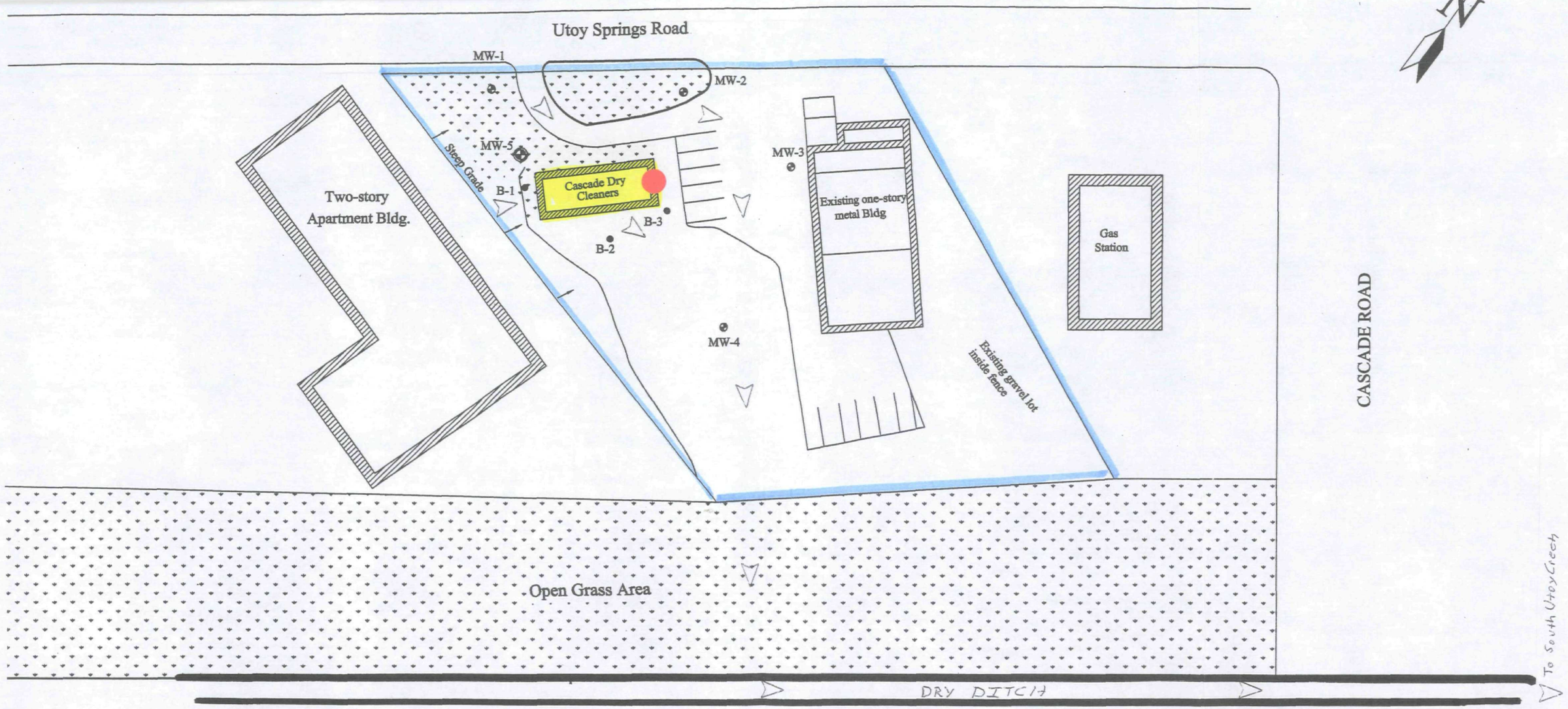


Figure 1 – Topographic Map. Site location shown as indicated. Source: USGS Ben Hill Quadrangle 7.5 Minute Series Topographic Map, 1954, photorevised 1982. Scale = 1:24,000

Figure 2 – Site Map (Adapted from Figure 1 of Epic Engineering, Inc., Preliminary Subsurface Investigation Report.).



Legend

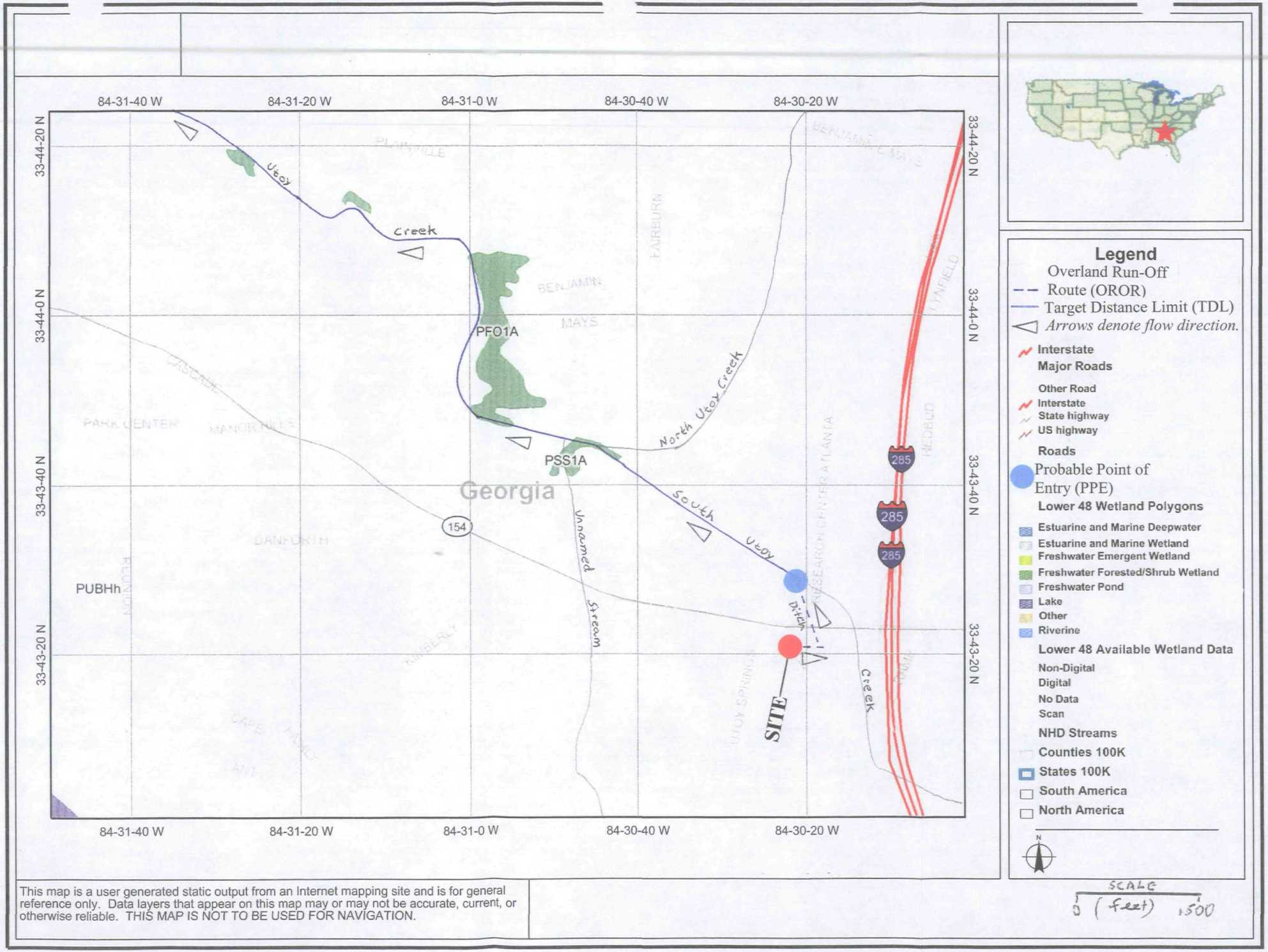
- Type II Monitoring Well
- Vertical Delineation Monitoring Well
- Piezometer
- Run-off pathway
- Site Reference Point
- Facility Building
- Site Boundary

Horizontal Scale

0 25 50

1" = 50'

Figure 3 – Wetlands map showing the Overland Run-off Route (OROR), the Probable Point of Entry (PPE) of overland run-off into a perennial surface water body, and the first two miles of the surface water Target Distance Limit (TDL).



This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

APPENDIX A

TRIP REPORT

Georgia Department of Natural Resources
2 Martin Luther King, Jr. Drive, SE, Suite 1462, Atlanta, Georgia 30334
Chris Clark, Commissioner
Environmental Protection Division
F. Allen Barnes, Director

July 30, 2010

TRIP REPORT

FILE COPY

SITE NAME & LOCATION: Cascade Springs Cleaner Site
1160 Utoy Springs Road
Atlanta, Fulton County, Georgia

TRIP BY: Lawrence Papetti, Geologist
Land Protection Branch
GA Environmental Protection Division (GA EPD)

ACCOMPANIED BY: Kevin Collins, Geologist
Land Protection Branch
GA EPD

DATE OF TRIP: June 24, 2010

OFFICIALS CONTACTED: Bipen Patel, Facility Operator, Cascade Springs Cleaner

Samuel E. Tompkins, Property Owner

REFERENCE: Reconnaissance for Pre-CERCLIS Screening Assessment (PSA)

PURPOSE:

The purpose of the site reconnaissance was to collect certain information necessary to complete a Pre-CERCLIS Screening Assessment (PSA) in accordance with the document titled: *Pre-CERCLIS Screening Assessment: Guidance Manual*, U.S. Environmental Protection Agency Region 4, Superfund Site Evaluation Section, August, 2006.

COMMENTS:

The following comments serve to document areas visited, interviews conducted and observations noted during the June 24, 2010 site reconnaissance.

1. The Cascade Springs Cleaner site is located at 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia (Attachment A: Figure 1 – Topographic Map). A map showing the site location with respect to surrounding properties is included as Attachment B: Figure 2 – Site Map. Hereinafter, the area identified in Figure 2 within the site boundary is referred

to as "the site." The site location is also shown on the map included as Attachment C: Figure 3 – Wetlands map showing entry point of ditch (receiving site run-off) into South Utoy Creek.

2. Photographs are included as Attachment D: Twenty-three (23) Photographs. A copy of the logbook documentation for the reconnaissance activities is included as Attachment E: Logbook Documentation.

3. Upon arrival at the site on June 24, 2010, the facility operator, Bipen Patel, was present in the Cascade Springs Cleaner facility building (Figure 2) in which he runs a dry cleaning business named, "Cascade Springs Cleaner." Hereinafter, the Cascade Springs Cleaner facility building is referred to as the "facility building."

4. Bipen Patel referred the investigator to the property owner, Samuel E. Tompkins, for permission to enter the facility building. The investigator met Samuel E. Tompkins across the parking lot from the facility building at his place of business, Wood and Tompkins Cores at 1180 Utoy Springs Road, identified in Figure 2 as "Existing one-story metal Building." Samuel E. Tompkins granted the investigator access to the facility building. Samuel E. Tompkins said that Wood and Tompkins Cores sells used automotive parts.

5. Observations made inside the facility building were as follows:

   - There was a half-full fifty-five (55) gallon drum inside the facility building, containing material identified by owner Bipen Patel as perchloroethylene dry-cleaning machine sludge (See Attachment D: Photo 1 of 23). Bipen Patel said that a company named MCF routinely picks up the sludge. The drum was unlabeled.

   - There was a single dry-cleaning machine in the facility building. Bipen Patel said the machine utilizes perchloroethylene (See Attachment D: Photo 2 of 23).

   - There were several areas of stained concrete on the work floor of the facility building (See Attachment D: Photos 3-7 of 23).

   - There were several containers of materials identified by Bipen Patel as spotting chemicals inside the facility building (See Attachment D: Photo 8 of 23). Labels identified the following products in these containers: Pyratex grease cutter, Tannaid, Picrin oily spot remover with TCE, CP boiler treatment, Laidlaw silk pre-spotter, Stand By silk spotter, Easy Go spray spotter, Steelex spray spotter, and Pro-line laundry P.O.G.

6. The X-Ray Fluorescence analyzer (XRF) allows for the *in situ* screenings of soil, sediment, or waste for a variety of metals. Seven (7) screenings of stains on the concrete floor within the facility building were conducted, clustered in the following three (3)

different areas:

- The area between the dry-cleaning machine and the south exterior wall,
- The area next to the water fountain and vacuum canister (near the northern exterior wall), and
- The area next to the Unipress machine (near the center of the building).

All screenings were conducted in situ (i.e. in place) of the surface of the concrete floor within the facility building. Standardization readings from a stainless steel clip of known composition were taken before any sample screening was conducted. A table of the XRF results is included as Attachment F: XRF Data. All concentrations are expressed in milligrams-per-kilogram (mg/kg). The results of the XRF screenings are as follows:

- Metals that were not detected above the associated reporting limit/Limit of Detection (LOD) in any of the seven (7) screenings consist of (highest LOD in parentheses): cobalt (2,027 mg/kg), selenium (59 mg/kg), silver (224 mg/kg), cadmium (282 mg/kg), antimony (571 mg/kg), and mercury (937 mg/kg).
- Metals that were detected in at least one of the screenings, with the highest concentration detected shown in parenthesis, were: titanium (57,986 mg/kg), chromium (316 mg/kg), manganese (325 mg/kg), iron (55,272 mg/kg), nickel (103 mg/kg), copper (6,622 mg/kg), zinc (2,500,146 mg/kg), arsenic (88 mg/kg), rubidium (207 mg/kg), strontium (279 mg/kg), zirconium (305 mg/kg), molybdenum (705 mg/kg), tin (332 mg/kg), barium (7,935 mg/kg), and lead (583 mg/kg).

Accordingly, the stained concrete floor within the facility building is an area where hazardous substances were detected by XRF.

7. Site reconnaissance determined the geographic coordinates of the Site Reference Point as Latitude 33.72246 degrees north, Longitude 84.50632 degrees west. Figure 2 shows the location of the Site Reference Point. Method Accuracy Description (MAD) data, according to the format requirements of the Environmental Protection Agency's *Quick Reference Guide, Entering Latitude/Longitude Data* and based on field data, are as follows:

   Accuracy: 5.2 meters.

   Collection Method: GPS Code (Pseudo Range) Differential (corresponds to use of a recreational grade GPS receiver).

   Reference Datum: NAD83 (datum used by GPS receiver).

Reference Point: During site reconnaissance, the investigators established the Site Reference Point as the front door of the facility building (See Attachment D: Photo 9 of 23). The GAEPD chose this reference point location because it is close to the dry cleaning plant, easily identifiable, and centrally located on the site.

Source Map Scale: None (used GPS receiver)

Verification Method (optional): DOQQ verified using USGS Ben Hill, Georgia 1:24,000 scale topographic quadrangle map, 1954, Photorevised 1982.

Source (optional): Field data.

Point/Line/Area (optional): Not determined.

Measurement Sequence (optional): Not determined.

Collection Date: June 24, 2010.

8. A parking lot and a one-story metal building containing Wood and Tompkins Cores are located east of the facility building (See Attachment D: Photos 10 and 13 of 23). A gas station is located on the adjacent property east of the Wood and Tompkins Cores building.

9. A two-story apartment building, currently occupied, is located approximately 40 feet from the facility building on the adjacent property west of the site (See Attachment D: Photo 11 of 23).

10. A grassy area and Utoy Springs Road are located north of the facility building and Murray Brothers Funeral Home is located across Utoy Springs Road (See Attachment D: Photo 12 of 23).

11. A parking lot and an open grass area are located south of the facility building (See Attachment D: Photo 14 of 23).

12. A dry ditch and a golf driving range named The Cascade Driving Range are located beyond the grass area to the south (See Attachment D: Photo 15 of 23). Samuel E. Tompkins said he owns the driving range.

13. Site run-off from the facility building flows southward over the parking lot, across the open grass area, to a ditch located approximately 250 feet from the facility building (Figure 2). Run-off continues approximately 900 feet north northwestward through the ditch (which runs beneath overhead power transmission lines), underneath Cascade Road and Research Center Atlanta Drive, to the ditch's terminus in South Utoy Creek. The ditch was dry at the time of reconnaissance (See Attachment D: Photo 15 of 23).

14. The coordinates of the confluence of the ditch (receiving site run-off) into South Utoy Creek are Latitude 33.72494 degrees north, Longitude 84.50575 degrees west, with an accuracy of 11 feet (See Attachment D: Photo 16-19 of 23).

15. The investigator observed surface water, beginning at the point where the ditch (receiving site run-off) enters South Utoy Creek, to flow along the following route:

    - Through South Utoy Creek a distance of approximately 3,300 feet northwestward to the confluence with North Utoy Creek.

    - Through Utoy Creek downstream (northwest) of the confluence of North Utoy Creek and South Utoy Creek a distance of approximately 5,000 feet. Utoy Creek continues to the northwest beyond the area of reconnaissance (Figure 3).

16. Reconnaissance observations and interviews provided the following information supporting perennial conditions at and downstream of the confluence of the ditch (receiving site run-off) with South Utoy Creek:

    - The investigator observed South Utoy Creek, North Utoy Creek, and Utoy Creek at its head to be flowing and to have a sandy substrate (See Attachment D: Photos 20, 21, and 23 of 23).

    - Samuel E. Tompkins of Wood and Tompkins Cores said that he has never seen South Utoy Creek run dry.

    - Leon Benton of Leon Benton Construction, who said his property adjoins the confluence of North Utoy Creek and South Utoy Creek, said that he has seen these streams run to a trickle but not dry up before. Leon Benton said that he has operated Leon Benton Construction at that location since 1977.

17. The investigator observed fish at the following nearby locations downstream of the site:

    - South Utoy Creek at the terminus of the ditch (receiving site run-off), (See Attachment D: Photo 16 of 23),

    - South Utoy Creek between Fairburn Road and the confluence with North Utoy Creek (See Attachment D: Photo 23 and 23 of 23), and

    - Utoy Creek at the Confluence of North Utoy Creek and South Utoy Creek (See Attachment D: Photo 22 of 23)

    The fish the investigator observed include: bass, bream, and schools of fish (type not identified).

18. The investigator observed all of the areas identified as freshwater forested/shrub wetlands in Figure 3 to be undeveloped (See Attachment D: Photos 17-23 of 23).

RECOMMENDATIONS & FOLLOW-UP REQUIRED:

Use the information herein to complete a PSA report (in conjunction with additional information).

ATTACHMENTS:

A. Figure 1 – Topographic Map
B: Figure 2 – Site Map
C: Figure 3 – Wetlands map showing entry point of ditch (receiving site run-off) into South Utoy Creek
D: Twenty-three (23) Photographs
E: Logbook Documentation
F: XRF Data

REVEIWED BY: Andrew S. Taft 7/30/2010

ATTACHMENT A: Figure 1 – Topographic Map

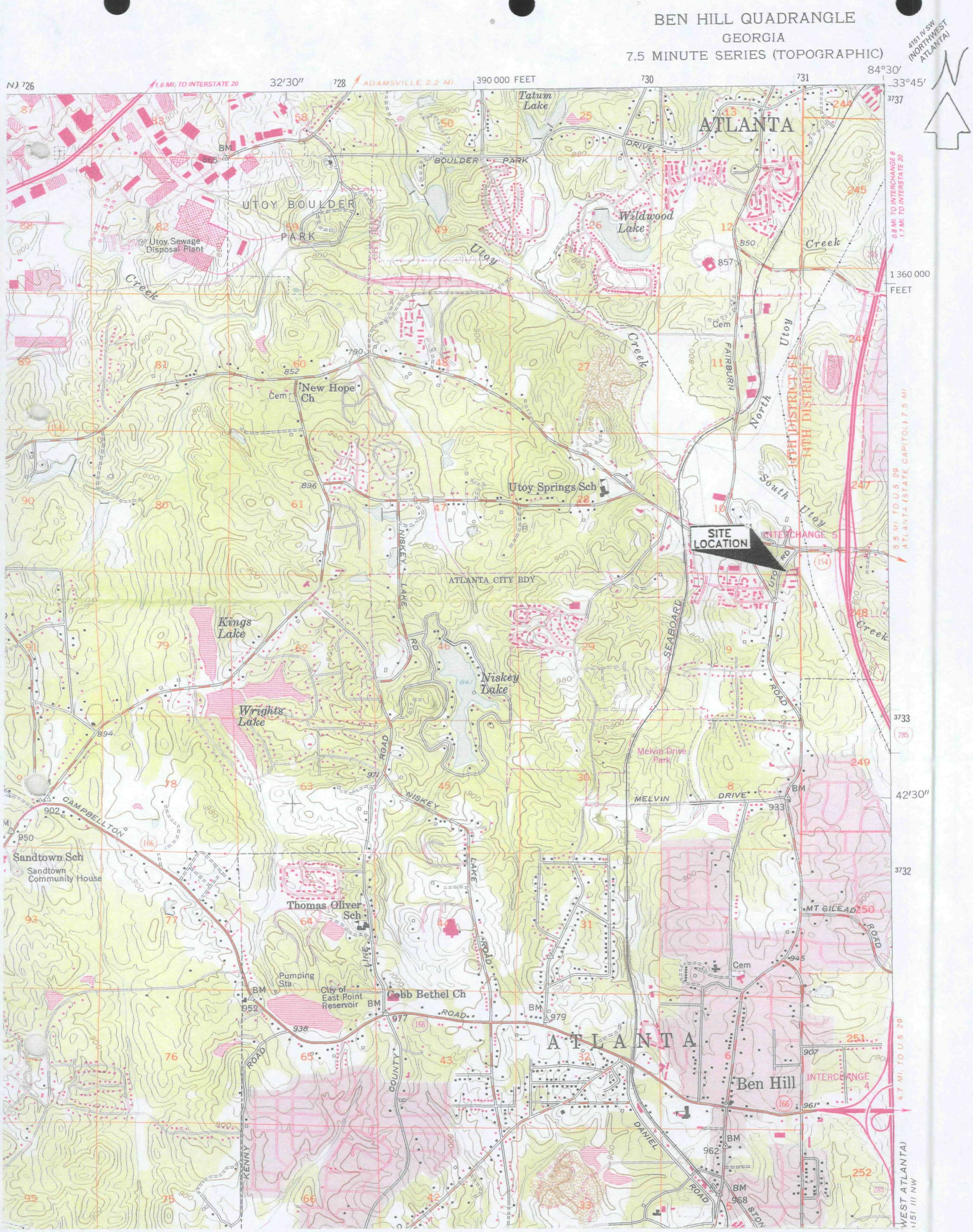
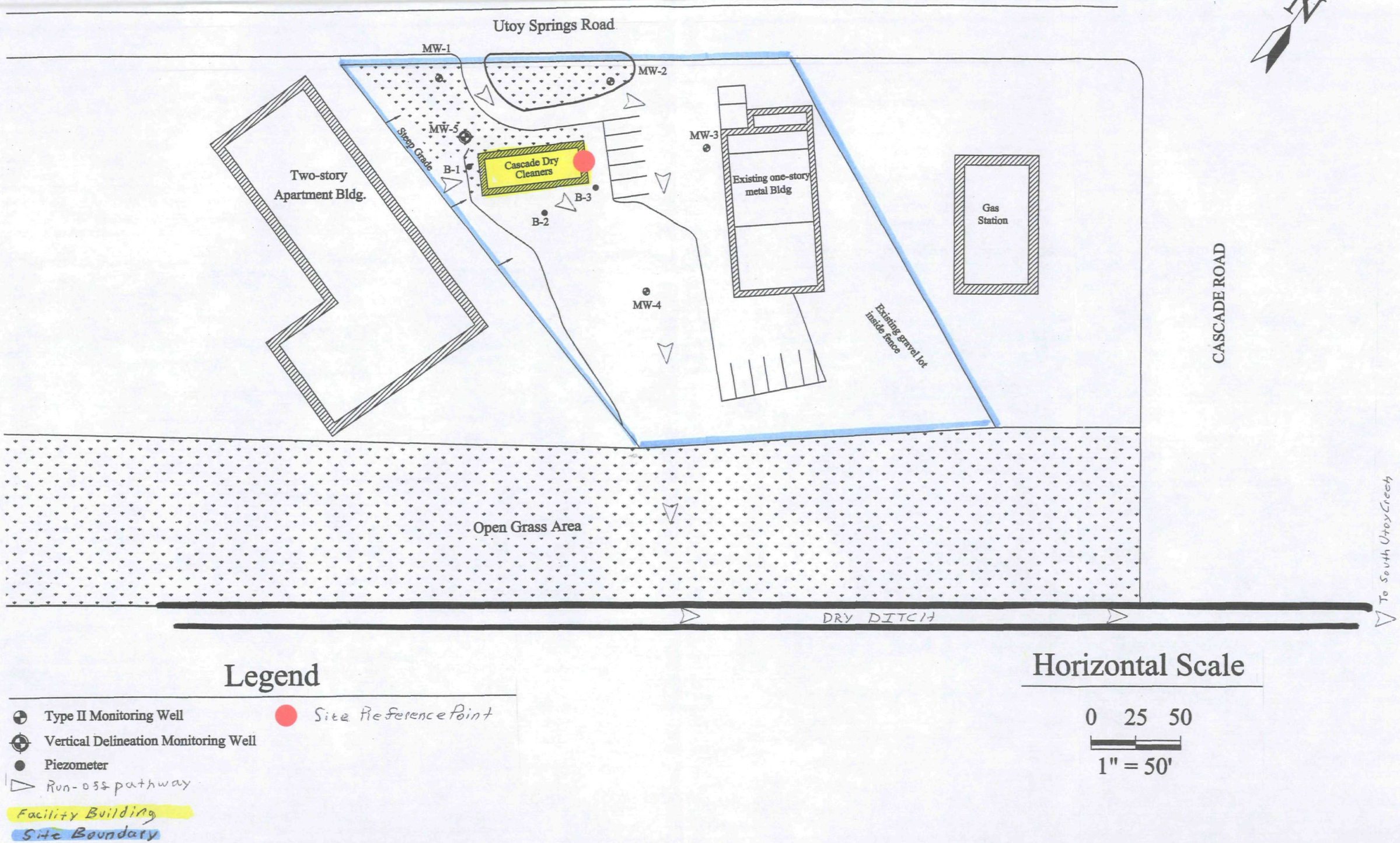


Figure 1 – Topographic Map. Site location shown as indicated. Source: USGS Ben Hill Quadrangle 7.5 Minute Series Topographic Map, 1954, photorevised 1982. Scale = 1:24,000

ATTACHMENT B: Figure 2 – Site Map

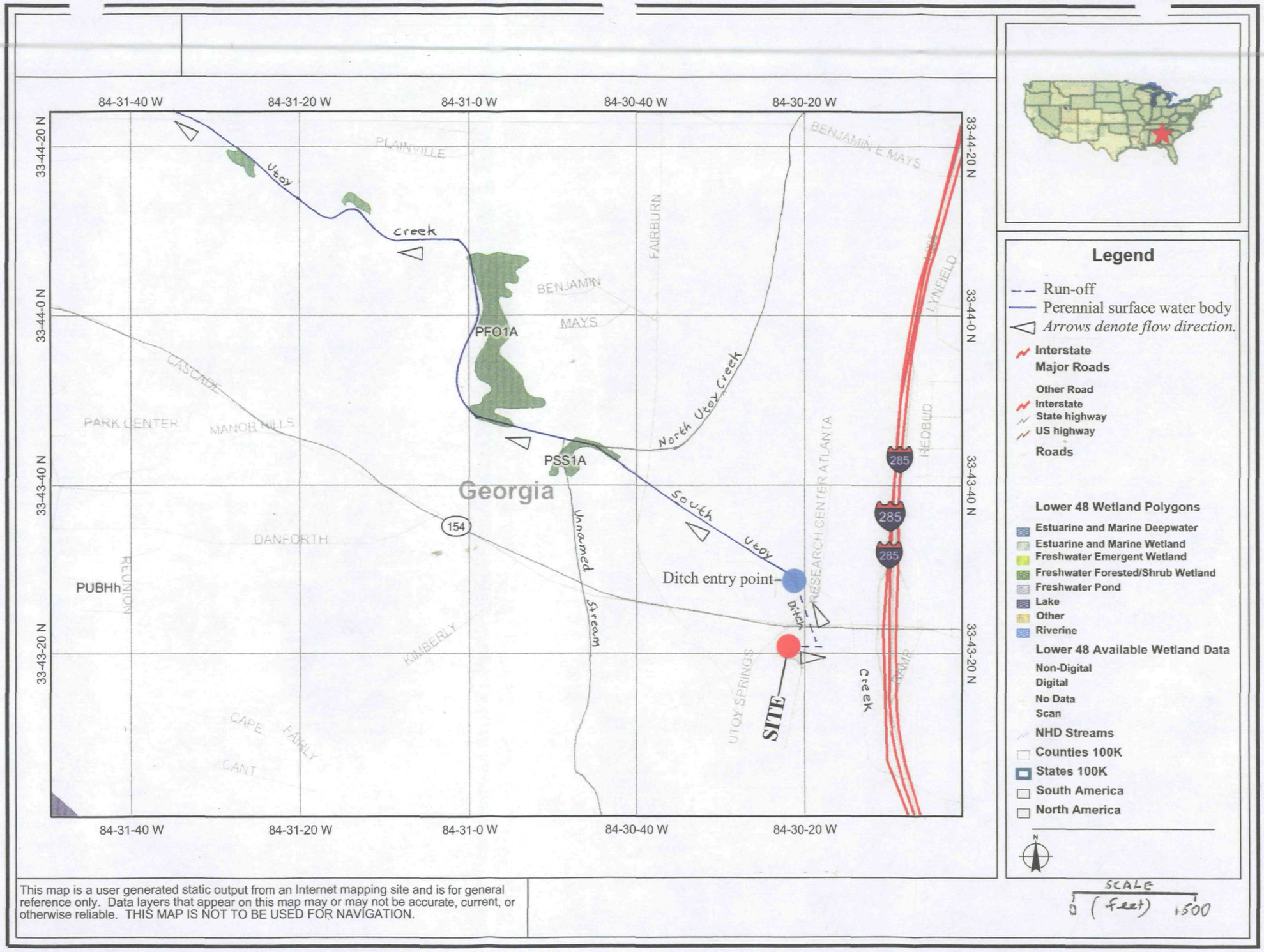
Figure 2 – Site Map (Adapted from Figure 1 of Epic Engineering, Inc., Preliminary Subsurface Investigation Report.).



ATTACHMENT C:

Figure 3 – Wetlands map showing entry point of ditch (receiving site run-off) into South Utoy Creek

Figure 3 – Wetlands map showing entry point of ditch (receiving site run-off) into South Utoy Creek



This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

ATTACHMENT D: Twenty-three (23) Photographs

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 9:27

Photo Number / Direction Facing: 1 of 23 / Not Applicable

Photographer: Lawrence Papetti

Photo Description: Depiction of half-full 55-gallon unlabeled drum inside facility building, containing material identified by owner Bipen Patel as perchloroethylene dry-cleaning machine sludge.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 9:28

Photo Number / Direction Facing: 2 of 23 / Not Applicable

Photographer: Lawrence Papetti

Photo Description: Depiction of single dry cleaning machine (as identified by owner Bipen Patel) inside facility building.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 9:36

Photo Number / Direction Facing: 3 of 23 / Southwest

Photographer: Lawrence Papetti

Photo Description: Depiction of area of stained concrete floor behind dry cleaning machine inside facility building.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 9:36

Photo Number / Direction Facing: 4 of 23 / Not Applicable

Photographer: Lawrence Papetti

Photo Description: Depiction of area of stained concrete floor behind dry cleaning machine inside facility building (close-up).

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 9:36

Photo Number / Direction Facing: 5 of 23 / Not Applicable

Photographer: Lawrence Papetti

Photo Description: Depiction of area of stained concrete floor behind dry cleaning machine inside facility building (close-up).

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 9:55

Photo Number / Direction Facing: 6 of 23 / Not Applicable

Photographer: Lawrence Papetti

Photo Description: Depiction of area of stained concrete floor next to water fountain (left edge) and vacuum cleaner tank (silver tank) inside facility building.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 10:01

Photo Number / Direction Facing: 7 of 23 / Not Applicable

Photographer: Lawrence Papetti

Photo Description: Depiction of area of stained concrete floor next to device identified by owner Bipen Patel as a unipress machine (on left) inside facility building.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 10:05

Photo Number / Direction Facing: 8 of 23 / Not Applicable

Photographer: Lawrence Papetti

Photo Description: Depiction of spotting chemicals (as identified by owner Bipen Patel) inside facility building.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 10:25

Photo Number / Direction Facing: 9 of 23 / Southwest

Photographer: Lawrence Papetti

Photo Description: Depiction of front of Cascade Springs Cleaner facility building.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 10:41

Photo Number / Direction Facing: 10 of 23 / West

Photographer: Lawrence Papetti

Photo Description: Depiction of parking lot between Wood and Tompkins Cores building (on right) and Cascade Springs Cleaner facility building (on left) looking uphill along the run-off pathway from the site.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 10:41

Photo Number / Direction Facing: 11 of 23 / West

Photographer: Lawrence Papetti

Photo Description: Depiction of two-story apartment building southwest of Cascade Springs Cleaner facility building.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 10:43

Photo Number / Direction Facing: 12 of 23 / West

Photographer: Lawrence Papetti

Photo Description: Depiction of Murray Brothers Funeral Home across Utoy Springs Road west of Cascade Springs Cleaner facility building.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 10:44

Photo Number / Direction Facing: 13 of 23 / East

Photographer: Lawrence Papetti

Photo Description: Depiction of Wood and Tompkins Cores building east of Cascade Springs Cleaner facility building.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 10:45

Photo Number / Direction Facing: 14 of 23 / East

Photographer: Lawrence Papetti

Photo Description: View downhill of run-off pathway from site, taken from front of Cascade Springs Cleaner facility building. The Wood and Tompkins Cores building loading dock is on the left. The Cascade Driving Range is in the background.

Site Name: Cascade Springs Cleaner

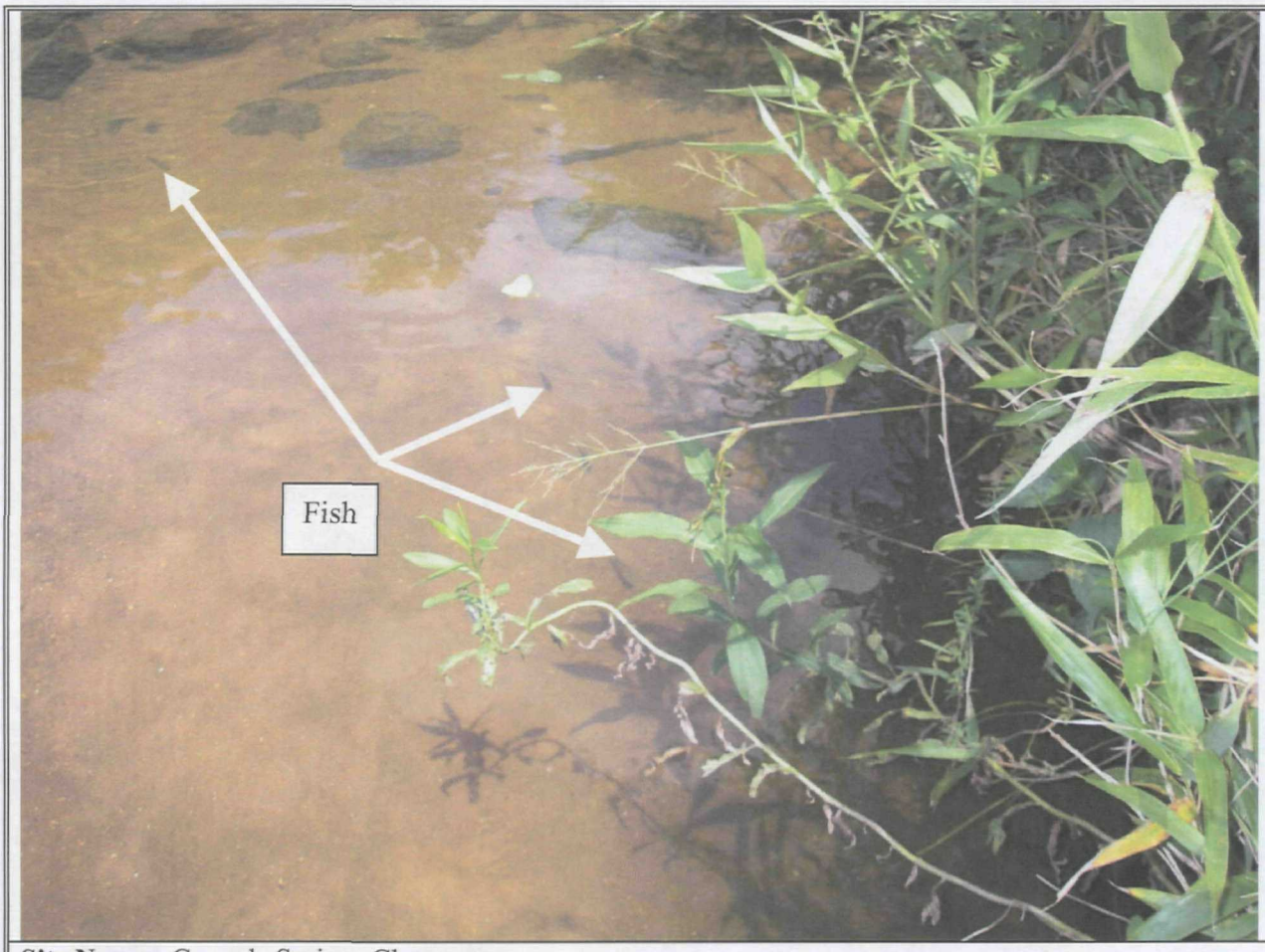
Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 10:48

Photo Number / Direction Facing: 15 of 23 / North

Photographer: Lawrence Papetti

Photo Description: Depiction of dry ditch receiving run-off from the site. The Cascade Driving Range boundary is right (east) of the ditch. The slope of the ditch is away from the camera toward Cascade Road. Cascade Road is in front of the buildings visible in the background.



Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 11:17

Photo Number / Direction Facing: 16 of 23 / Not Applicable

Photographer: Lawrence Papetti

Photo Description: Depiction of fish visible in South Utoy Creek where ditch (receiving run-off from the site) enters South Utoy Creek.

Site Name: Cascade Springs Cleaner

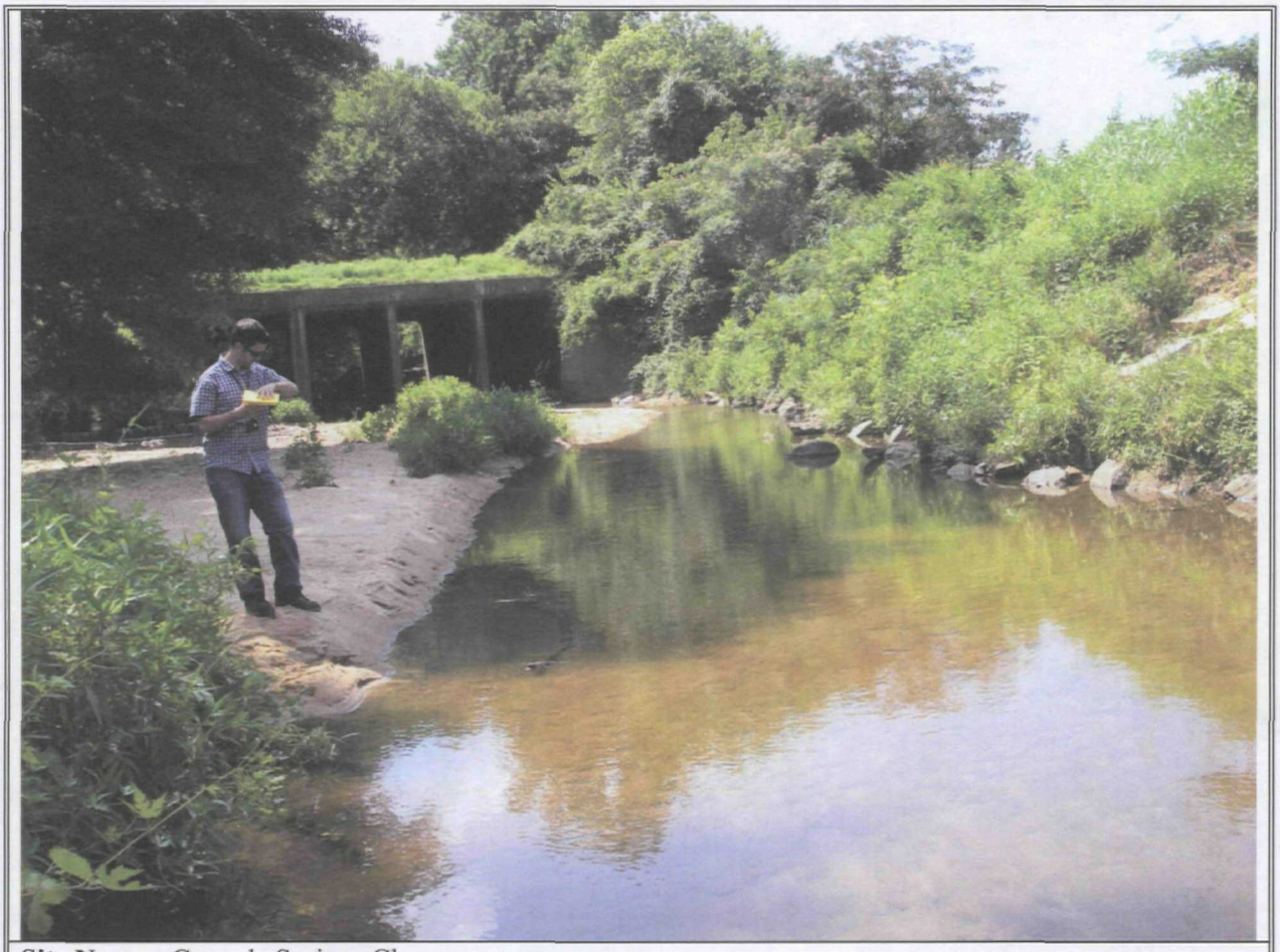
Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 11:17

Photo Number / Direction Facing: 17 of 23 / West

Photographer: Lawrence Papetti

Photo Description: View of confluence (arrow) of ditch (receiving run-off from the site) and South Utoy Creek.



Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 11:18

Photo Number / Direction Facing: 18 of 23 / East

Photographer: Lawrence Papetti

Photo Description: View upstream of South Utoy Creek at confluence of ditch (receiving run-off from the site) and South Utoy Creek.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 11:18

Photo Number / Direction Facing: 19 of 23 / West

Photographer: Lawrence Papetti

Photo Description: View downstream of South Utoy Creek from confluence of ditch (receiving run-off from the site) and South Utoy Creek.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 11:43

Photo Number / Direction Facing: 20 of 23 / East

Photographer: Lawrence Papetti

Photo Description: View upstream of North Utoy Creek beneath Fairburn Road bridge.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 11:51

Photo Number / Direction Facing: 21 of 23 / East

Photographer: Lawrence Papetti

Photo Description: View upstream of confluence of North Utoy Creek (on left) and South Utoy Creek (on right) from Utoy Creek (foreground).

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 11:52

Photo Number / Direction Facing: 22 of 23 / West

Photographer: Lawrence Papetti

Photo Description: View downstream of Utoy Creek from confluence of North Utoy Creek and South Utoy Creek. Note the wooded, undeveloped land downstream in the background.

Site Name: Cascade Springs Cleaner

Site Address: 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia

Photo Date / Photo Time: June 24, 2010 / 11:58

Photo Number / Direction Facing: 23 of 23 / Northwest

Photographer: Lawrence Papetti

Photo Description: View downstream of South Utoy Creek from location approximately 500 feet upstream of the confluence of North Utoy Creek and South Utoy Creek. Pool in foreground contains hand-sized fish, including a small bass (not visible in photo). South Utoy Creek and Utoy Creek in this area have forested/shrub buffers.

ATTACHMENT E: Logbook Documentation

ATTACHMENT D: Logbook Documentation

6-24-10

Cascade Cleaner
Kevin Collins
Larry Papetti - [signature]

0800 - 0830 Talkin
to Tech - Multi-fae
Cal. O2 Sensor bal.
Mileage 9123
Multifae
Calibrated w/ isobutylene
for VOCs successfully
[signature] 6-24-10

[signature]
B/cn
6/24/10

0907
XRF
Rds#

1 Standard reaction
2 NIST 2709 Low
3 NIST 2710 High

Biper Pates

owner -
- Samuel Tompkins
President/CEO
Wood & Tompkins Care

MCF picks up Sludge
55 gal drum ~ 1/2 full
Photo @ 0927

[signature] 6-24-10

Photo 0928 sink
dry cleaning machine

VOCs ND around
map, floor, machine

XRF Readings

NIST 2710
4 Hg 67, Pb 5400, Cu 2999

concrete floor
5 Zn 6996, Pb 497, Cu 3313
6 Cu 6622, Zn 9211, Pb 492
7 Mn 164, Cu 556, Zn 2148
8 Cu 2740, Pb 583

3-Photos 0936 taken of stained concrete floor btwn machine & wall

6-24-10

Hours: Mon - Fri
7:00 A.M. - 6:00 P.M.
Saturday
8:00 A.M. - 5:00 P.M.

CASCADE SPRINGS CLEANER

Full Service Dry Cleaners
Available for Wholesale
Dry Cleaning & Laundry Services

1160 Utoy Springs Rd.
Atlanta, GA 30331

BIPIN PATEL
Owner
(404) 344-7873

2nd
Taken of concrete floor btwn dry cleaning machine & wall
Stained Concrete

6-24-10

XRF

9 Stained Concrete floor next to water fountain & Vacuum.

Photo @ 0955

10 Zn 19,300, Pb 62, Cu 694

11 >10% Zn, Pb 311

Photo @ 1001

Spotting chemicals
Photo 1005

6-24-10

The Cascade Driving Range
3520 Cascade Road
Atlanta, Ga. 30331
Learn to Play Golf, it's Fun!
Samuel E. Tompkins
Owner
Office 1: 404.349.4712
Office 2: 404.691.9925
Mobile: 404.317.7407
cascaderoaddriv1@bellsouth.net

Black area Stained Concrete floor next to Unipress machine
Silver Stainings, Same area

Pyratex grease Cutter
Tannaid
Ricin oilyspot remove w/ TCE
CP boiler treatment
Laidlaw Silk pre-spotter
Stand By Silk Spotter
East Go Spray Spotter
Streeter Spray Spotter
Pro-line Laundry [illegible]

Ground lightning
Ramsey Scram Blood

XRF

12 SiO_2 Blank
13 NIST 2709 Low
14 NIST 2710 High

Photo @ 1025 Front Door of Facility.
View SE

Front Door

33.72246 N, 84.50632 ±17'

6-24-10

Photo 1041 View W
Uphill toward facility

Photo 1041 View SW
of apt. blds.
S. of facility

Photo 1043 View W.
of Murray Bros
funeral home across
Utoy Spgs Rd.

Photo 1044 View E
of Cores blds
Note Shop door.

Photo 1045 View E
downhill from site
along OROR

Photo 1048 View N.
Approx. OROR entry pt.
into dry ditch running

6-24-10

beneath transmission lines.

Cascade Rd. is in background.

1106 spoke to 5 day laborers waiting for work @ S. Utoy Ck. They all said they don't fish & haven't seen anyone fish from S. Utoy Ck.

Coordinates of OROR ditch into S Utoy Ck.

N33.72494
W84.50575 +/- 11'

Ditch follows power lines northward from site to S. Utoy Ck.

~ 200' W. of Research Ctr. Atlanta Dr.

6-24-10

6-24-10

Schools of Small fish present + hand-sized bream

Photos from entry pt. of ditch to S. Utoy Ck.

1117 School of Small fish

1117 View downstream on S. Utoy Ck (west)

1118 View upstream (East) on S. Utoy Ck.

1118 View southward of ditch entry pt. into S. Utoy Ck taken from N. bank.

Sandbar has lots of deer tracks.

S. Utoy Ck flow brisk. Sandy substrate

6-24-10

Photo 1143 View E
of N. Utoy Ck
beneath Fairburn
Rd bridge.
Flow brisk estimated
in the 10-100 cfs
range.
Sandy substrate
no fish noticed.

Photo 1151 View E
of confluence of
N. & South Utoy
Cks. View upstream.

1152 Same location View
West/downstream
of Utoy Ck. Wooded,
Undeveloped.
6-24-10

Sandy substrate
w/ gravel.
Fish are present
+ deer tracks.
33.72871 / 84.51141 ± 27'

Photo 1158 View NW
of S. Utoy Ck from
Fairburn Rd crossing,
~500' upstream of
confl. w/ N. Utoy Ck.
View is downstream
steady flow.
Pools contain hand-
sized fish Kevin
said are big enough
he thinks people
would eat.
Kevin saw a small bass.
6-24-10

Presence of bass population contributes to evidence of Perennial Conditions

Area visible from Confluence of North & S. Utoy Ch downstream > 0.1 mile is not developed. Scrub-forest.

[signature] 6-24-10

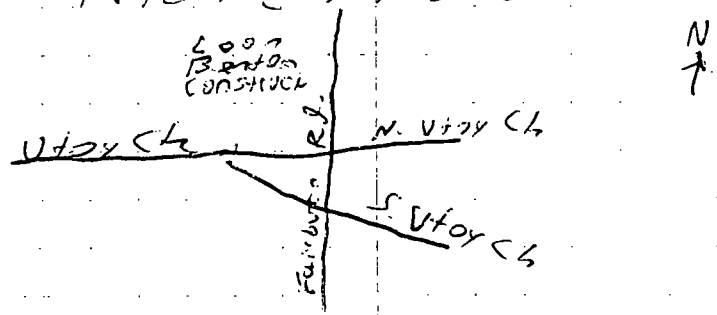
Name of Leon Benton Hardin Construction

(404) 691-5639

- Leon Benton

Since 1977

Leon Benton Said
- Never seen anyone fishing
- Saw creek down to a trickle last year



[signature] 6-24-10

1248 Spoke to Mr. Bifen Patel Got his card. He said he's never seen anyone fishing in area.

1250 Spoke to Mr. Samuel Tomkins of Tomkins Cores

- Wholesale auto parts.
- He's never seen S. Utoy Ck run dry. He's never seen anyone fishing in S. Utoy Ck.

6-24-10

- ~~Capt.~~ J.A. Mole (770) 265 2051
- A. Hutcheson. Captain
  Fulton Fire Sta 23
  4121 Cascade Rd
- Never seen anyone fish Utoy Ck. It runs behind Police/fire station

Capt. said that Utoy Ck. gets nasty when it crosses Fulton Industrial Blvd.

6 other firemen in room. Nobody has seen fishing

6-24-10

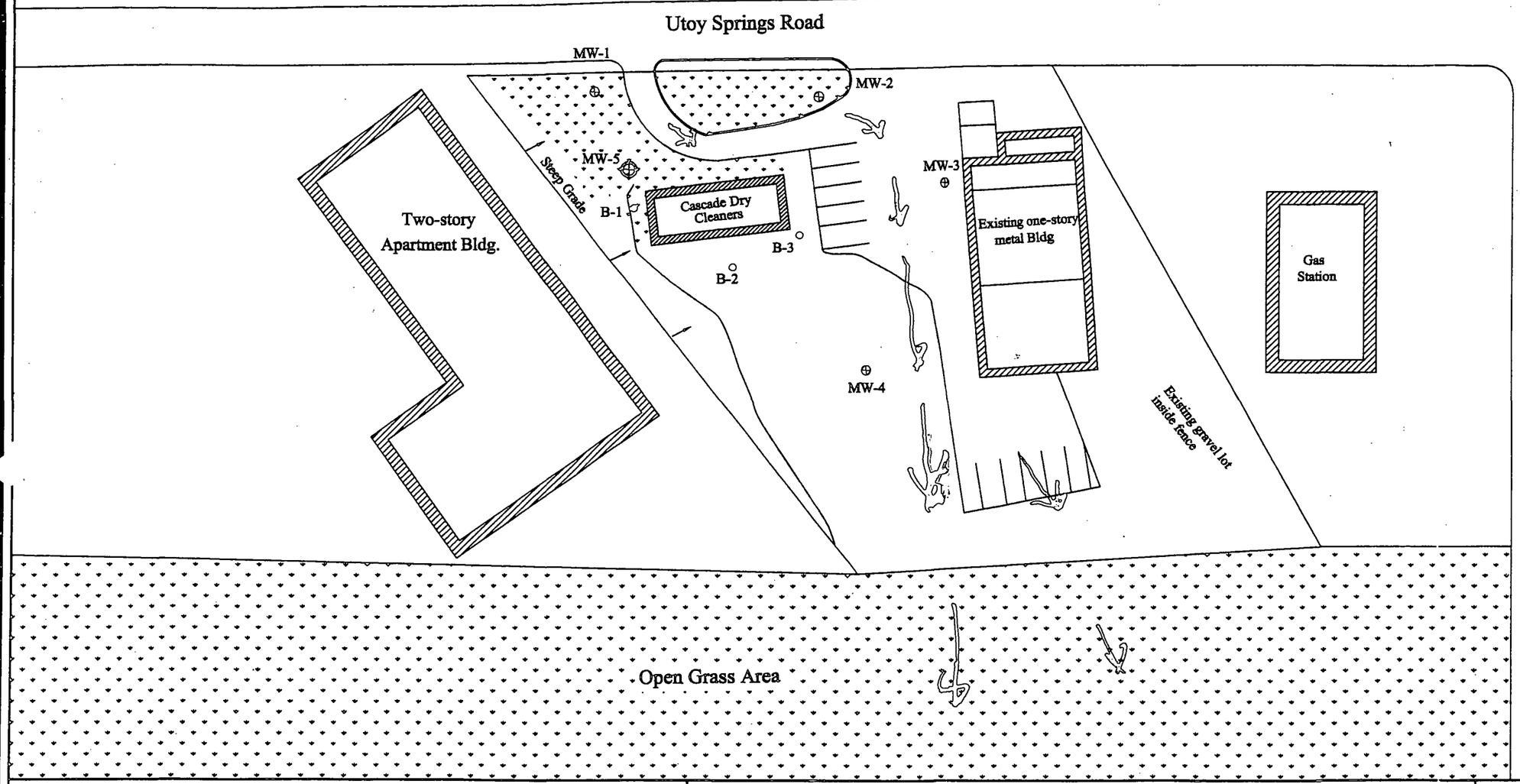
1335 Ret. to office

Mileage 9151

6-24-10

Funeral Home

Strip Mall
Starbucks, Court Rental



Legend	Figure 1	Horizontal Scale
⊕ Type II Monitoring Well ⊕ Vertical Delineation Monitoring Well ○ Piezometer	VICINITY/LOCATION MAP Cascade Dry Cleaners 1160 Utoy Springs Road Atlanta, Fulton County, Georgia Dry Ditch	0 25 50 1" = 50'

SOURCE: Epic Engineerinf field notes
PROJECT#: 21074-1

DRAWN

Epic Engineering, Inc.

ATTACHMENT F: XRF Data

June 24, 2010 XRF Data
Cascade Springs Cleaner
Atlanta, Fulton County, Georgia

Date	Reading	Description	Time	Mode	LiveTime	Match1	MN1	Pass/Fail	Pass Fail Standard
24-Jun-10	1	Standardization clip	8:57:55	Standardization	35.98	0.019635	221	-0.013907	PASS
24-Jun-10	2	SiO2 Blank	8:59:31	Soil	12.98				
24-Jun-10	3	NIST 2709 standard	9:01:43	Soil	44.31				
24-Jun-10	4	NIST 2710 standard	9:03:09	Soil	42.06				
24-Jun-10	5	Stained concrete floor between dry cleaning machine and wall	9:32:06	Soil*	1.96				
24-Jun-10	6		9:32:33	Soil*	41.49				
24-Jun-10	7		9:34:39	Soil*	42.38				
24-Jun-10	8		9:44:15	Soil*	42.39				
24-Jun-10	9	Stained concrete floor next to water fountain and vacuum canister	9:53:30	Soil*	40.2				
24-Jun-10	10	Stained concrete floor next to Unipress machine	9:59:53	Soil*	41.77				
24-Jun-10	11		10:01:34	Soil*	11.94				
24-Jun-10	12	SiO2 Blank	10:16:14	Soil	47.36				
24-Jun-10	13	NIST 2709 standard	10:17:47	Soil	43.82				
24-Jun-10	14	NIST 2710 standard	10:19:17	Soil	27.06				

*Soil mode is an instrument designation. These readings were of stained concrete, not soil.

June 24, 2010 XRF Data
Cascade Springs Cleaner
Atlanta, Fulton County, Georgia

Date	Reading	Description	LE	LE +/-	LE Pass	P	P +/-	P Pass	S	S +/-	S Pass
24-Jun-10	1	Standardization clip									
24-Jun-10	2	SiO2 Blank	<LOD	0		NA			NA		
24-Jun-10	3	NIST 2709 standard	<LOD	0		NA			NA		
24-Jun-10	4	NIST 2710 standard	<LOD	0		NA			NA		
24-Jun-10	5	Stained concrete floor between dry cleaning machine and wall	<LOD	0		NA			NA		
24-Jun-10	6		<LOD	0		NA			NA		
24-Jun-10	7		<LOD	0		NA			NA		
24-Jun-10	8		<LOD	0		NA			NA		
24-Jun-10	9	Stained concrete floor next to water fountain and vacuum canister	<LOD	0		NA			NA		
24-Jun-10	10	Stained concrete floor next to Unipress machine	<LOD	0		NA			NA		
24-Jun-10	11		<LOD	0		NA			NA		
24-Jun-10	12	SiO2 Blank	<LOD	0		NA			NA		
24-Jun-10	13	NIST 2709 standard	<LOD	0		NA			NA		
24-Jun-10	14	NIST 2710 standard	<LOD	0		NA			NA		

June 24, 2010 XRF Data
Cascade Springs Cleaner
Atlanta, Fulton County, Georgia

Date	Reading	Description	Cl	Cl +/-	Cl Pass	K	K +/-	K Pass	Ca	Ca +/-	Ca Pass
24-Jun-10	1	Standardization clip									
24-Jun-10	2	SiO2 Blank	NA			NA			NA		
24-Jun-10	3	NIST 2709 standard	NA			NA			NA		
24-Jun-10	4	NIST 2710 standard	NA			NA			NA		
24-Jun-10	5	Stained concrete floor between dry cleaning machine and wall	NA			NA			NA		
24-Jun-10	6		NA			NA			NA		
24-Jun-10	7		NA			NA			NA		
24-Jun-10	8		NA			NA			NA		
24-Jun-10	9	Stained concrete floor next to water fountain and vacuum canister	NA			NA			NA		
24-Jun-10	10	Stained concrete floor next to Unipress machine	NA			NA			NA		
24-Jun-10	11		NA			NA			NA		
24-Jun-10	12	SiO2 Blank	NA			NA			NA		
24-Jun-10	13	NIST 2709 standard	NA			NA			NA		
24-Jun-10	14	NIST 2710 standard	NA			NA			NA		

June 24, 2010 XRF Data
Cascade Springs Cleaner
Atlanta, Fulton County, Georgia

Date	Reading	Description	Ti	Ti +/-	Ti Pass	Cr	Cr +/-	Cr Pass	Mn	Mn +/-	Mn Pass
24-Jun-10	1	Standardization clip									
24-Jun-10	2	SiO2 Blank	<LOD	1048		<LOD	168		<LOD	56	
24-Jun-10	3	NIST 2709 standard	3106	342	Pass	<LOD	138		389	40	Pass
24-Jun-10	4	NIST 2710 standard	3410	423	Pass	<LOD	163		10036	195	Pass
24-Jun-10	5	Stained concrete floor between dry cleaning machine and wall	17972	3090	Pass	<LOD	912		<LOD	439	
24-Jun-10	6		6313	456	Pass	247	56	Pass	204	40	Pass
24-Jun-10	7		2459	302	Pass	166	42	Pass	164	29	Pass
24-Jun-10	8		9795	560	Pass	316	64	Pass	197	46	Pass
24-Jun-10	9	Stained concrete floor next to water fountain and vacuum canister	27845	833	Pass	<LOD	139		201	34	Pass
24-Jun-10	10	Stained concrete floor next to Unipress machine	57986	1321	Pass	<LOD	177		325	44	Pass
24-Jun-10	11		<LOD	12285		<LOD	2219		<LOD	1414	
24-Jun-10	12	SiO2 Blank	<LOD	477		<LOD	73		<LOD	44	
24-Jun-10	13	NIST 2709 standard	2963	352	Pass	<LOD	136		316	38	Pass
24-Jun-10	14	NIST 2710 standard	3475	562	Pass	<LOD	230		10817	259	Pass

June 24, 2010 XRF Data
Cascade Springs Cleaner
Atlanta, Fulton County, Georgia

Date	Reading	Description	Fe	Fe +/-	Fe Pass	Co	Co +/-	Co Pass	Ni	Ni +/-	Ni Pass
24-Jun-10	1	Standardization clip									
24-Jun-10	2	SiO2 Blank	<LOD	97		<LOD	45		<LOD	58	
24-Jun-10	3	NIST 2709 standard	31172	382	Pass	282	66	Pass	<LOD	52	
24-Jun-10	4	NIST 2710 standard	38461	524	Pass	<LOD	238		<LOD	61	
24-Jun-10	5	Stained concrete floor between dry cleaning machine and wall	30569	1736	Pass	<LOD	926		<LOD	267	
24-Jun-10	6		30605	406	Pass	<LOD	205		80	21	Pass
24-Jun-10	7		13661	189	Pass	<LOD	127		61	16	Pass
24-Jun-10	8		55272	701	Pass	<LOD	278		96	23	Pass
24-Jun-10	9	Stained concrete floor next to water fountain and vacuum canister	15676	225	Pass	<LOD	147		<LOD	56	
24-Jun-10	10	Stained concrete floor next to Unipress machine	31459	426	Pass	<LOD	207		103	22	Pass
24-Jun-10	11		3942	702	Pass	<LOD	2027		<LOD	1394	
24-Jun-10	12	SiO2 Blank	<LOD	49		<LOD	27		<LOD	33	
24-Jun-10	13	NIST 2709 standard	31698	389	Pass	<LOD	196		88	18	Pass
24-Jun-10	14	NIST 2710 standard	39643	679	Pass	<LOD	311		<LOD	79	

June 24, 2010 XRF Data
Cascade Springs Cleaner
Atlanta, Fulton County, Georgia

Date	Reading	Description	Cu	Cu +/-	Cu Pass	Zn	Zn +/-	Zn Pass	As	As +/-	As Pass
24-Jun-10	1	Standardization clip									
24-Jun-10	2	SiO2 Blank	<LOD	48		<LOD	20		<LOD	13	
24-Jun-10	3	NIST 2709 standard	34	9	Pass	93	7	Pass	14	3	Pass
24-Jun-10	4	NIST 2710 standard	2999	56	Pass	6936	99	Pass	699	35	Pass
24-Jun-10	5	Stained concrete floor between dry cleaning machine and wall	3313	243	Pass	6946	404	Pass	<LOD	119	
24-Jun-10	6		6622	96	Pass	9311	122	Pass	88	10	Pass
24-Jun-10	7		556	18	Pass	2148	34	Pass	<LOD	11	
24-Jun-10	8		2740	51	Pass	4033	62	Pass	61	11	Pass
24-Jun-10	9	Stained concrete floor next to water fountain and vacuum canister	2889	50	Pass	20625	241	Pass	19	4	Pass
24-Jun-10	10	Stained concrete floor next to Unipress machine	699	24	Pass	19300	241	Pass	<LOD	13	
24-Jun-10	11		<LOD	1076		2500146	151952	Pass	<LOD	106	
24-Jun-10	12	SiO2 Blank	<LOD	24		<LOD	10		<LOD	6	
24-Jun-10	13	NIST 2709 standard	<LOD	26		87	6	Pass	23	3	Pass
24-Jun-10	14	NIST 2710 standard	3055	71	Pass	7161	129	Pass	704	45	Pass

June 24, 2010 XRF Data
Cascade Springs Cleaner
Atlanta, Fulton County, Georgia

Date	Reading	Description	Se	Se +/-	Se Pass	Rb	Rb +/-	Rb Pass	Sr	Sr +/-	Sr Pass
24-Jun-10	1	Standardization clip									
24-Jun-10	2	SiO2 Blank	<LOD	7		10	3	Pass	21	4	Pass
24-Jun-10	3	NIST 2709 standard	<LOD	3		86	3	Pass	221	5	Pass
24-Jun-10	4	NIST 2710 standard	<LOD	11		123	4	Pass	323	7	Pass
24-Jun-10	5	Stained concrete floor between dry cleaning machine and wall	<LOD	14		79	12	Pass	158	18	Pass
24-Jun-10	6		<LOD	5		41	2	Pass	202	5	Pass
24-Jun-10	7		<LOD	3		47	2	Pass	178	4	Pass
24-Jun-10	8		<LOD	5		50	2	Pass	199	5	Pass
24-Jun-10	9	Stained concrete floor next to water fountain and vacuum canister	<LOD	4		22	2	Pass	279	5	Pass
24-Jun-10	10	Stained concrete floor next to Unipress machine	<LOD	4		19	2	Pass	259	6	Pass
24-Jun-10	11		<LOD	59		207	15	Pass	173	15	Pass
24-Jun-10	12	SiO2 Blank	<LOD	3		12	1	Pass	18	2	Pass
24-Jun-10	13	NIST 2709 standard	<LOD	4		89	3	Pass	229	5	Pass
24-Jun-10	14	NIST 2710 standard	<LOD	14		129	5	Pass	340	9	Pass

June 24, 2010 XRF Data
Cascade Springs Cleaner
Atlanta, Fulton County, Georgia

Date	Reading	Description	Zr	Zr +/-	Zr Pass	Mo	Mo +/-	Mo Pass	Ag	Ag +/-	Ag Pass
24-Jun-10	1	Standardization clip									
24-Jun-10	2	SiO2 Blank	49	5	Pass	49	7	Pass	<LOD	79	
24-Jun-10	3	NIST 2709 standard	121	3	Pass	10	3	Pass	<LOD	38	
24-Jun-10	4	NIST 2710 standard	104	4	Pass	22	3	Pass	<LOD	44	
24-Jun-10	5	Stained concrete floor between dry cleaning machine and wall	305	25	Pass	<LOD	40		<LOD	181	
24-Jun-10	6		284	6	Pass	<LOD	9		<LOD	42	
24-Jun-10	7		245	5	Pass	<LOD	8		<LOD	38	
24-Jun-10	8		214	5	Pass	<LOD	9		<LOD	43	
24-Jun-10	9	Stained concrete floor next to water fountain and vacuum canister	62	3	Pass	<LOD	9		<LOD	40	
24-Jun-10	10	Stained concrete floor next to Unipress machine	101	4	Pass	<LOD	9		<LOD	43	
24-Jun-10	11		<LOD	44		705	56	Pass	<LOD	224	
24-Jun-10	12	SiO2 Blank	45	3	Pass	34	3	Pass	<LOD	40	
24-Jun-10	13	NIST 2709 standard	117	3	Pass	<LOD	8		<LOD	38	
24-Jun-10	14	NIST 2710 standard	114	5	Pass	25	4	Pass	<LOD	56	

June 24, 2010 XRF Data
Cascade Springs Cleaner
Atlanta, Fulton County, Georgia

Date	Reading	Description	Cd	Cd +/-	Cd Pass	Sn	Sn +/-	Sn Pass	Sb	Sb +/-	Sb Pass
24-Jun-10	1	Standardization clip									
24-Jun-10	2	SiO2 Blank	<LOD	94		<LOD	152		<LOD	152	
24-Jun-10	3	NIST 2709 standard	<LOD	48		<LOD	81		<LOD	83	
24-Jun-10	4	NIST 2710 standard	<LOD	56		<LOD	94		<LOD	97	
24-Jun-10	5	Stained concrete floor between dry cleaning machine and wall	<LOD	244		<LOD	435		<LOD	461	
24-Jun-10	6		<LOD	55		<LOD	97		<LOD	101	
24-Jun-10	7		<LOD	49		<LOD	85		<LOD	89	
24-Jun-10	8		<LOD	56		332	34	Pass	<LOD	103	
24-Jun-10	9	Stained concrete floor next to water fountain and vacuum canister	<LOD	52		<LOD	91		<LOD	94	
24-Jun-10	10	Stained concrete floor next to Unipress machine	<LOD	57		<LOD	99		<LOD	106	
24-Jun-10	11		<LOD	282		<LOD	528		<LOD	571	
24-Jun-10	12	SiO2 Blank	<LOD	48		<LOD	76		<LOD	76	
24-Jun-10	13	NIST 2709 standard	<LOD	49		<LOD	82		<LOD	85	
24-Jun-10	14	NIST 2710 standard	<LOD	72		<LOD	122		<LOD	127	

June 24, 2010 XRF Data
Cascade Springs Cleaner
Atlanta, Fulton County, Georgia

Date	Reading	Description	I	I +/-	I Pass	Ba	Ba +/-	Ba Pass	Hg	Hg +/-	Hg Pass
24-Jun-10	1	Standardization clip									
24-Jun-10	2	SiO2 Blank	NA			<LOD	417		<LOD	17	
24-Jun-10	3	NIST 2709 standard	NA			<LOD	358		<LOD	10	
24-Jun-10	4	NIST 2710 standard	NA			<LOD	448		67	10	Pass
24-Jun-10	5	Stained concrete floor between dry cleaning machine and wall	NA			<LOD	2752		<LOD	83	
24-Jun-10	6		NA			<LOD	438		<LOD	19	
24-Jun-10	7		NA			<LOD	317		<LOD	12	
24-Jun-10	8		NA			529	175	Pass	<LOD	16	
24-Jun-10	9	Stained concrete floor next to water fountain and vacuum canister	NA			1992	223	Pass	<LOD	23	
24-Jun-10	10	Stained concrete floor next to Unipress machine	NA			2800	310	Pass	<LOD	24	
24-Jun-10	11		NA			7935	1820	Pass	<LOD	937	
24-Jun-10	12	SiO2 Blank	NA			<LOD	206		<LOD	8	
24-Jun-10	13	NIST 2709 standard	NA			475	126	Pass	<LOD	10	
24-Jun-10	14	NIST 2710 standard	NA			616	204	Pass	76	13	Pass

June 24, 2010 XRF Data
Cascade Springs Cleaner
Atlanta, Fulton County, Georgia

Date	Reading	Description	Pb	Pb +/-	Pb Pass	field1
24-Jun-10	1	Standardization clip				
24-Jun-10	2	SiO2 Blank	<LOD	20		Larry
24-Jun-10	3	NIST 2709 standard	24	4	Pass	Larry
24-Jun-10	4	NIST 2710 standard	5450	76	Pass	Larry
24-Jun-10	5	Stained concrete floor between dry cleaning machine and wall	497	56	Pass	Larry
24-Jun-10	6		492	13	Pass	Larry
24-Jun-10	7		54	4	Pass	Larry
24-Jun-10	8		583	15	Pass	Larry
24-Jun-10	9	Stained concrete floor next to water fountain and vacuum canister	56	5	Pass	Larry
24-Jun-10	10	Stained concrete floor next to Unipress machine	62	5	Pass	Larry
24-Jun-10	11		311	35	Pass	Larry
24-Jun-10	12	SiO2 Blank	10	3	Pass	Larry
24-Jun-10	13	NIST 2709 standard	16	3	Pass	Larry
24-Jun-10	14	NIST 2710 standard	5659	100	Pass	Larry

APPENDIX B

SELECTED REFERENCES

REFERENCE 5

Site No.: **10441** Site Name: **Cascade Springs Dry Cleaner**

04/10/2001 10:34:21

Location: 1180 Utoy Springs Rd.
Atlanta Lat 33 ° 43 ' 18 " N Lon 84 ° 30 ' 23 " W
County: Fulton 30331
Parcel ID: 14F District, Map 10-LL, Parcel 63

Property Owner: Wood & Tompkins Cores, Inc.
1180 Utoy Springs Rd.
Atlanta , GA 30331
Phone: (404)349-4712

Contact Person: Samuel Tompkins
President
Wood & Tompkins Cores, Inc.
1180 Utoy Springs Rd.
Atlanta , GA 30331
Phone: (404)349-4712

Facility ow/op: Mr. Bipin Patele
Owner
Cascade Springs Dry Cleaner
1160 Utoy Springs Rd.
Atlanta , GA 30331
Phone: (404)344-7873

EPA ID: GAD981269095
Entered HSI Database on : 03/04/1997
Corrective Action Site Class: 2 Cleanup Code: 1

OUTPUT FROM REPORTABLE QUANTITIES SCREENING METHOD

GROUNDWATER PATHWAY ***Pathway Score:*** ***10.57***

A. Known (45), Suspected (10), or Pot. Future (5): 45
1B.Higher (6), Average (3), or Lower (0) Susceptibility: 0
2B. Physical State [stable solid=0; liquid=3]: 0
C. Containment [very good=0; poor=3]: 0

SUBSTANCE: (CAS: 127184) Tetrachloroethene
2D. Toxicity: 4 3D. Quantity: 4 - unknown

1E. Exposure: 4 (If 1E>4 then 2E=16)
2E. Distance to well or spring: 9 (If 1E=0 then 2E=1)

ON-SITE EXPOSURE PATHWAY ***Pathway Score:*** ***17.78***

A. Access [none=0; unlimited=4]: 4
B. Known (25), suspected (15), or no known (0) release: 15
C. Quality of containment [very good=0; poor=5]: 3

SUBSTANCE: (CAS: 127184) Tetrachloroethene
2D. Toxicity: 4 3D. Quantity: 4 - unknown

1E. Distance to resident [<300'=8; >1mile=1]: 8
2E. Sensitive Environment affected [yes=1]: 0

GEORGIA ENVIRONMENTAL PROTECTION DIVISION
HAZARDOUS SITE INVENTORY
July 1, 2009

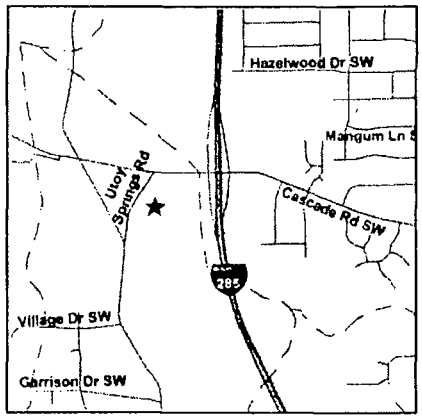
Site Number: **10441**

SITE NAME: Cascade Springs Dry Cleaner

LOCATION: 1180 Utoy Springs Rd.
Atlanta, Fulton County, GA 30331

PARCEL ID: 14F District, Map 10-LL, Parcel 63

Latitude 33° 43' 18" N Longitude 84° 30' 23" W



LAST KNOWN PROPERTY OWNER:
Wood & Tompkins Cores, Inc.
1180 Utoy Springs Rd.
Atlanta, GA 30331

STATUS OF CLEANUP ACTIVITIES:
Investigations are being conducted to determine how much cleanup is necessary for source materials, soil, and groundwater.

CLEANUP PRIORITY: The Director has designated this site as a Class I

GA EPD DIRECTOR'S DETERMINATION REGARDING CORRECTIVE ACTION:
The Director has determined that this site requires corrective action.

REGULATED SUBSTANCES RELEASED, AND THREATS TO HUMAN HEALTH AND ENVIRONMENT POSED BY THE RELEASE:

This site has a known release of Tetrachloroethene in groundwater at levels exceeding the reportable quantity. No human exposure via drinking water is suspected from this release. The nearest drinking water well is between 0.5 and 1 miles from the area affected by the release.

REGULATED SUBSTANCES:

Substance Name	GW	Soil	Substance Name	GW	Soil
Tetrachloroethene	✓	✓			

REFERENCE 9

Georgia Department of Natural Resources
2 Martin Luther King, Jr. Drive, Suite 1462 East, Atlanta, Georgia 30334
Noel Holcomb, Commissioner
Environmental Protection Division
Carol A. Couch, Ph.D., Director
Hazardous Waste Management Branch
404/657-8600

FILE COPY

November 3, 2006

CERTIFIED MAIL
Return Receipt Requested

Mr. Samuel Tompkins
1180 Utoy Springs Road
Atlanta, GA 30331

Re: Administrative Order No. EPD-HSR-495
Cascade Springs Dry Cleaner
HSI Site No. 10441

Dear Mr. Tompkins:

In January 2006, my staff met with you to discuss the cleanup of your property, which is listed on the Hazardous Sites Inventory (HSI). During this meeting and through subsequent correspondence, including a proposed consent order you advised EPD that you are unable to perform any additional investigation or cleanup on your property. Therefore, since you have not signed the proposed consent order, EPD is issuing the enclosed administrative order. If you and the other responsible parties are unable to cleanup the site, EPD will assign a state contractor to investigate and cleanup your property.

If you have any comments or questions about the requirements contained in this Order, please call Ms. Kelly Norwood of the Hazardous Sites Response Program at (404) 657-8600.

Sincerely,

Carol A. Couch, Ph.D.
Director

Enclosure: Administrative Order

File: Site 10441
S:\RDRIVE\KELLY\Sites\Cascade Springs\AO cover letter.doc

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

IN RE:	)	
	)	
Cascade Springs Dry Cleaner	)	Order No. EPD-HSR-495
1160 Utoy Springs Road	)	
Atlanta, Fulton County, Georgia	)	
HSI# 10441	)	
	)	
	)	
RESPONDENT	)	
	)	
Mr. Samuel Tompkins	)	
1180 Utoy Springs Road	)	
Atlanta, Georgia 30331	)	

ADMINISTRATIVE ORDER

WHEREAS, Mr. Samuel Tompkins (hereinafter the "Respondent") is the President of Wood & Tompkins Cores, Inc., which is the owner of the real property located at 1160 Utoy Springs Road, Atlanta, Fulton County, Georgia, at Latitude 33° 43' 18" N and Longitude 84° 30' 23" W (hereinafter the "Property"); and

WHEREAS, the Director of Environmental Protection Division, Department of Natural Resources, State of Georgia (hereinafter "Director" and "EPD", respectively) has determined that the Respondent is subject to the provisions of the Georgia Hazardous Site Response Act O.C.G.A. Section 12-8-90 et seq., as amended (hereinafter "Act") and the Rules promulgated pursuant thereto (hereinafter "Rules"); and

WHEREAS, Wood & Tompkins Cores, Inc. submitted a Release Notification/Reporting Form dated September 24, 1996, to the EPD reporting a release of tetrachloroethylene above background concentrations on the Property, requiring notification as specified in Section 391-3-19-.04(3) of the Rules; and

WHEREAS, tetrachloroethylene is a regulated substance as defined by Section 391-3-19-.02(2)(n) of the Rules; and

WHEREAS, any portion of the Property and any other property affected by a release exceeding a reportable quantity as defined in Section 391-3-19-.02(2)(v) of the Rules is hereinafter referred to as the "Site"; and

WHEREAS, the Director determined that there has been a release exceeding a reportable quantity at the Property and subsequently listed the Site on the Hazardous Site Inventory on April 2, 1997; and

WHEREAS, in accordance with Section 391-3-19-.06(3)(a) of the Rules, the Director requested from Wood & Tompkins Cores, Inc., in a letter dated June 29, 2001, the submittal of a compliance status report (hereinafter "CSR") by December 31, 2001 addressing the releases at the Site; and

WHEREAS, Wood & Tompkins Cores, Inc. submitted a CSR on March 1, 2002; and

WHEREAS, on February 21, 2003, EPD issued a Notice of Deficiency for the CSR requiring a revised CSR that addressed the deficiencies by May 21, 2003; and

WHEREAS, a revised CSR was not received by May 21, 2003, and has not yet been submitted to EPD; and

WHEREAS, a proposed Consent Order was issued to the Respondent on June 23, 2006 requesting signature by July 30, 2006; and

WHEREAS, the proposed Consent Order was not signed and returned by July 30, 2006, and has not yet been submitted to EPD.

NOW, THEREFORE, it is hereby ORDERED by the Director, pursuant to her authority under O.C.G.A. §12-8-96, that the Respondent does and accomplishes the following:

1. The Respondent shall submit a CSR that complies with Section 391-3-19-.06(3) of the Rules, addresses the comments in the February 21, 2003 Notice of Deficiency, and certification of compliance that complies with Section 391-3-19-.06(4) of the Rules for HSI Site Number 10441 to EPD no later than December 31, 2006.

2. The Respondent shall submit one (1) copy of the CSR, or any revision thereto, and any corrective action plan required by Conditions 3, 4, or 5 of this Order (hereinafter "CAP"), or any revision thereto, to each owner of property that the Respondent believes, based on the best available data, is part of the Site at the same time the CSR or the CAP is submitted to EPD. The Respondent shall provide evidence to EPD within ten (10) days after submittal to EPD that a copy of the CSR or the CAP has been delivered to each applicable owner. If EPD determines, after review of the distribution list, that additional properties are affected by the release and that additional property owners should receive a copy of the CSR or the CAP, the Respondent will be notified of such determination with an explanation as to why EPD believes such properties are affected by the release. Upon receipt of EPD's determination, the Respondent shall provide a copy of the revised CSR or the CAP to those property owners and provide evidence to EPD as such within ten (10) days of each property owner's receipt.

3. If the Respondent certifies in the CSR required by Condition 1, or any revision thereto, that any property is not in compliance with any of the Risk Reduction Standards of Section 391-3-19-.07 of the Rules (hereinafter "RRSs"), or upon written notice by EPD that EPD cannot concur with the Respondent's certification that a property is in compliance with any of the RRSs of Section 391-3-19-.07 of the Rules, the Respondent shall submit, within sixty (60) days of submitting said CSR or receipt of written notice, a CAP including a schedule and cost estimate that describes the corrective action that the Respondent has determined is necessary to achieve compliance with the RRSs.

4. If the Respondent certifies in the CSR required by Condition 1, or any revision thereto, that certain properties comply only with the Type 5 RRSs, the Respondent shall submit, along with the report, a proposed restrictive covenant for such properties plus a CAP including a schedule and cost estimate for monitoring and for maintaining any controls that are needed to maintain compliance with Type 5 RRSs for those properties.

5. If the Respondent certifies in the CSR required by Condition 1, or any revision thereto, that certain properties comply with either Type 3 or Type 4 RRSs, the Respondent shall submit, along with the report, a CAP including a schedule and cost estimate that describes the

continuing actions that the Respondent has determined are necessary to maintain compliance with Type 3 or Type 4 RRSs for those properties.

6. Upon receipt of EPD's written approval of the Respondent's CAP described in Conditions 3, 4, or 5, the Respondent shall implement the CAP in accordance with the schedule provided in the CAP.

7. The Respondent shall comply with Rule 391-3-19-.06(5), "Public Participation."

8. The Respondent shall within thirty (30) days of receipt of EPD's written approval of any CAP, submit and maintain a financial responsibility instrument and a written cost estimate for the total estimated cost of performing the activities described in the approved CAP that conforms, where applicable, to the form for financial assurance instruments set forth in 40 CFR 264, Subpart H or to such form as otherwise prescribed by EPD. The written cost estimate shall be reviewed periodically by the Respondent on a schedule to be specified by EPD upon approval of the cost estimate and financial responsibility instrument to ensure that the amount of the financial responsibility instrument is sufficient to ensure performance of the activities described in the CAP. If the cost estimate indicates the amount of the financial responsibility instrument is not sufficient to ensure performance of the activities described in the approved CAP, the Respondent shall notify EPD pursuant to Condition 11.

9. The Respondent shall seek access to any property not owned by the Respondent as may be necessary to comply with the terms of this Order. If unable to obtain such access, the Respondent shall notify EPD in accordance with the scheduling requirements of Condition 13. Such notice to EPD shall contain the following information:

   a. A narrative description of all efforts made by or on behalf of the Respondent to gain access to the property in question and the response of the owner(s) of such property to those efforts;

   b. A description of the property in question and an explanation of why access to such property is necessary to comply with the terms of this Order;

   c. A copy of all written correspondence from the Respondent to the owner(s) of the property in question showing that such owner(s) was (were) advised of the need for such access by the Respondent. Such correspondence shall include a copy of a letter sent by certified mail with return receipt requested from the Respondent to the owner(s) indicating that the Respondent has informed the owner(s) that access is required to investigate and/or remediate contamination which may have resulted from releases from the site;

   d. A copy of any written response(s) to the Respondent from the owner(s) of such property; and

   e. An explanation of how the Respondent intends to comply with the terms of this Order to the maximum extent practicable despite its failure to gain access to the property in question.

10. Upon receipt of any report, plan, schedule, cost estimate or financial responsibility instrument; or any portion of a report, plan, schedule, cost estimate or financial responsibility instrument; or any, revised report, plan, schedule or cost estimate or financial responsibility instrument; or any, revised portion of a report, plan, or schedule, cost estimate or financial responsibility instrument; or any written response (hereinafter collectively "document") required under the Rules or this Order, EPD shall review said document to determine its completeness with regard to the Rules and this Order. If EPD determines that said document is complete, EPD shall so

notify the Respondent in writing that said document is approved. If EPD determines that said document is incomplete, EPD shall provide the Respondent with written notice of any deficiencies.

The Respondent shall have sixty (60) days from receipt of the written notice of deficiencies to submit a revised document to EPD unless otherwise specified by EPD. Should the Respondent take exception to all or part of EPD's notice of deficiencies, the Respondent shall, within thirty (30) days after receipt of the written notice of deficiencies, submit to EPD a written statement of the grounds for the exception. EPD and the Respondent shall confer by telephone or in person in an attempt to resolve any disagreement. If agreement is reached, the resolution shall be written and signed by representatives of each party. If agreement cannot be reached within sixty (60) days from the date of Respondent's receipt of the notice of deficiencies, unless otherwise specified by EPD, the Respondent shall revise the document as required by EPD and resubmit the revised document in accordance with a schedule to be specified by EPD.

11. If, at any time, the Director determines that any element of any approved document required by this Order should be revised in order to meet the requirements established by this Order, the Act or Rules, EPD shall provide the Respondent with written notification of such determination, specify the basis for making such determination and request submittal of a revised document in accordance with a schedule specified by EPD. If at any time the Respondent determines that any element of any approved document required by this Order should be revised in order to meet the requirements established by this Order, the Act or Rules, the Respondent shall, within thirty (30) days of making such determination, revise and submit said document to EPD. Review, revision and submittal of any document required pursuant to this Condition, and resolution of any disputes in connection therewith, shall be conducted in accordance with the dispute resolution procedure set forth in Condition 10.

12. All documents required by this Order are, upon approval by the Director, incorporated into this Order. The Respondent shall implement all approved documents. Except as provided in Condition 13, any noncompliance with such approved documents shall be termed noncompliance with this Order.

13. All actions required by this Order, or any approved document shall be conducted in accordance with the schedules prescribed therein, unless there is a delay caused by reasonably unforeseen circumstances beyond the control of the Respondent. Reasonably unforeseen circumstances beyond the control of the Respondent shall include:

    a. Failure to secure timely and necessary federal, state or local approvals or permits to conduct the work, provided that such approvals or permits have been timely and diligently sought;

    b. Judicial or administrative action resulting from third-party litigation which affects the activities covered by this Order and is inconsistent with the terms and conditions of this Order;

    c. Act of God, act of war, insurrection, civil disturbance, flood, vandalism, contractor or supplier strikes or bankruptcy, or unanticipated breakage or accident to machinery, equipment, or lines of pipe despite diligent maintenance; and

    d. Inability to gain access to property not owned by the Respondent provided the Respondent has provided notice to the Director pursuant to Condition 9.

The Respondent shall notify EPD verbally within forty-eight (48) hours of any circumstance that will cause a schedule delay of more than three (3) and less than five (5) working days; any circumstances causing a delay of more than five (5) working days shall be notified to the EPD in writing within seven (7) days. Said written notice shall advise EPD of the anticipated length and cause of the delay. The Respondent and EPD agree to negotiate informally and in good faith schedule extensions resulting from such delays. In the event that any circumstance or series of circumstances cause the schedule to extend over thirty (30) calendar days, the Respondent and EPD shall meet formally to assess the overall schedule impact and attempt to mitigate it. If agreement is reached as to the length of such extension(s), the agreement shall be written and signed by representatives of each party. If agreement cannot be reached, the Respondent shall comply with EPD's determination as to the appropriate extension, which shall be communicated to the Respondent in writing. Any delay or series of delays causing the schedule to extend more than sixty (60) days shall be cause for the Director to terminate this Order.

14. To the extent that any submittal required pursuant to this Order is due on a Saturday, Sunday or state-recognized holiday, such submittal shall be made on the immediate subsequent business day. A submittal must be received by the EPD before 4:30 p.m. on the date the submittal is due. Failure to turn in a submittal in accordance with said time frame will be considered a violation of this Order.

15. This Administrative Order shall not preclude the EPD from taking any other actions authorized by law for violation of the Order or for any other violation of the Act, the rules, or regulations promulgated thereunder, or an Order of the Director, and if the Director is required to undertake judicial proceedings, the Director will not be barred from seeking civil penalties.

This Administrative Order is effective upon issuance, and pursuant to O.C.G.A. §12-2-2(c)(3)(B) it is not appealable unless or until the Director issues a notice of intent to enforce this Administrative Order, or recover a civil penalty for violation of any provision of this Administrative Order at any time now or in the future. In the event the Director issues notice of her intent to take any of the foregoing actions with respect to the Respondent, the Respondent shall have the right to petition for a hearing on this Administrative Order within thirty (30) days from the date on which the Director issues notice to Respondent. If Respondent files a timely petition for hearing on this Administrative Order within 30 days, this Administrative Order shall be stayed by statute or rule. If the Respondent does not appeal this Administrative Order within 30 days, this Administrative Order will be final and subject to further enforcement immediately.

The ORIGINAL AND THREE (3) COPIES of any petition for a hearing in this matter shall be filed with the Director by hand delivering same to Ms. Sherry Payton, Filing Clerk, Environmental Protection Division, 2 Martin Luther King Junior Drive S.E., Suite 1152 East, Atlanta, Georgia 30334, or by sending by certified mail to the Director at the following address:

Carol A. Couch, Ph.D.
Director
Environmental Protection Division
2 Martin Luther King Jr. Drive, SE, Suite 1152 East
Atlanta, Georgia 30334-9000
ATTN: Ms. Sherry Payton, Filing Clerk

The Petition for Hearing shall be deemed filed on the date received by the Filing Clerk or when mailed by first class mail, with proper postage attached, and properly addressed, whichever comes first.

A separate copy of any Petition for Hearing shall be served on the Director's counsel of record, to wit:

John E. Hennelly
Senior Assistant Attorney General
132 State Judicial Building
40 Capitol Square, SW
Atlanta, Georgia 30334-1300

It is so ORDERED this 7th day of November.

Carol A. Couch, PhD, Director
Environmental Protection Division
Department of Natural Resources
State of Georgia

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Samuel Tompkins
1180 Utoy Springs Road
Atlanta, GA 30331

COMPLETE THIS SECTION ON DELIVERY

A. Signature: X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name): Abraham Middlebrooks C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

1180 Utoy Springs Rd

Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7005 1820 0005 2339 5499

PS Form 3811, February 2004 KB Domestic Return Receipt 441 KW 102595-02-M-1540

7005 1820 0005 2339 5499

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com®
OFFICIAL USE

Postage $
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Deli (Endorsement F
Total Postage

Postmark Here

Sent To
Mr. Samuel Tompkins
1180 Utoy Springs Road
Atlanta, GA 30331
Street, Apt. No. or PO Box No.
City, State, ZIP+4

See Reverse for Instructions

PS Form 3800, June 2002

REFERENCE 11

RECORD OF CONVERSATION

LAWRENCE PAPETTI

GEORGIA ENVIRONMENTAL PROTECTION DIVISION

CONTACT INFORMATION

Name: Alexandra Cleary	**Title:** Program Manager, Response and Remediation Program
Affiliation: Georgia Environmental Protection Division	**Telephone #:** Personal conversation

SUMMARY OF CONVERSATION

DATE: August 2, 2010	**TIME:** 08:30

Alexandra Cleary said that Cascade Springs Dry Cleaner is non-compliant with respect to the Georgia Hazardous Site Response Act, and there has not been any activity since Administrative Order EPD-HSR-495 in 2006.

SIGNATURE:

APPENDIX C

PSA CHECKLIST AND SCORESHEETS

PRE-CERCLIS SCREENING ASSESSMENT CHECKLIST/DECISION FORM

This checklist can assist the site investigator during the Pre-CERCLIS screening. It will be used to determine whether further steps in the site investigation process are required under CERCLA. Use additional sheets, if necessary.

Checklist Preparer: Lawrence Papetti (Name/Title) — July 30, 2010 (Date)

2 Martin Luther King Jr. Drive Southeast, Suite 1452 East, Atlanta, Georgia 30334 (Address) — (404) 657-8600 (Phone)

larry.Papetti@dnr.state.ga.us (E-Mail Address)

Site Name: Cascade Springs Dry Cleaner GAN000410590

Previous Names (if any): _____

Site Location: 1160 Utoy Springs Road (Street)

Atlanta, (City) Georgia (ST) 30331 (Zip)

Latitude: 33.72246 degrees north, Longitude: 84.50632 degrees west

	Complete the following checklist. If "yes" is marked, please explain below.	YES	NO
1.	Does the site already appear in CERCLIS?	□	X
2.	Is the release from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures?	□	X
3.	Does the site consist of a release of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found?	□	X
4.	Is the release into a public or private drinking water supply due to deterioration of the system through ordinary use?	□	X
5.	Is some other program actively involved with the site (i.e., another Federal, State, or Tribal program)?	X	□
6.	Are the hazardous substances potentially released at the site regulated under a statutory exclusion (i.e., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC, UMTRCA, or OSHA)?	□	X
7.	Are the hazardous substances potentially released at the site excluded by policy considerations (e.g., deferral to RCRA Corrective Action)?	□	X
8.	Is there sufficient documentation that clearly demonstrates that there is no potential for a release that could cause adverse environmental or human health impacts (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, documentation showing that no hazardous substance releases have occurred, EPA approved risk assessment completed)?	□	X

Please explain all "yes" answer(s), attach additional sheets if necessary: At the time of this PSA, the facility is non-compliant with the GA EPD's cleanup requirements set forth in the Georgia Rules for Hazardous Site Response (Refs. 9 and 11). Although the site is listed on the GA EPD's Hazardous Site Inventory (HSI) as Site Number 10441, the GA EPD issued November 7, 2006 Administrative Order EPD-HSR-495 to clean up the site because the owner is unable to perform any additional investigation or cleanup (Ref. 9).

Site Determination: X Enter the site into CERCLIS. Further assessment is recommended (explain below).

□ The site is not recommended for placement into CERCLIS (explain below).

DECISION/DISCUSSION/RATIONALE:

Based upon available information and current site conditions, the site is recommended as a candidate for inclusion to the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) and for subsequent evaluation under the HRS. The threat to sensitive environments in the Surface Water Pathway by itself warrants further evaluation of the site under the Hazard Ranking System (HRS).

Regional EPA Reviewer: Donna K Seade 9-27-10
Print Name/Signature Date

State Agency/Tribe: Lawrence Papetti 7-30-10
Print Name/Signature Date

****** CONFIDENTIAL ******
******PRE-DECISIONAL DOCUMENT ******
****** SUMMARY SCORESHEET ******
****** FOR COMPUTING PROJECTED HRS SCORE ******

****** Do Not Cite or Quote ******

Site Name: Cascade Spring Cleaner

Region: Region 4

Scenario Name: PSA

City, County, State: Atlanta, Fulton County, Georgia

Evaluator: Papetti

EPA ID#: None

Date: 07/29/2010

Lat/Long: 0:0:0,0:0:0

Congressional District:

This Scoresheet is for: Pre-CERCLIS Screening

Scenario Name: PSA

Description:

	S pathway	S^2 pathway
Ground Water Migration Pathway Score (S_{gw})	0.0	0.0
Surface Water Migration Pathway Score (S_{sw})	60.0	3600.0
Soil Exposure Pathway Score (S_s)	0.0	0.0
Air Migration Score (S_a)	0.0	0.0
$S^2_{gw} + S^2_{sw} + S^2_s + S^2_a$		3600.0
$(S^2_{gw} + S^2_{sw} + S^2_s + S^2_a)/4$		900.0
$/ (S^2_{gw} + S^2_{sw} + S^2_s + S^2_a)/4$		30.0

Pathways not assigned a score (explain): The Groundwater, Soil Exposure, and Air Migration Pathways were not evaluated, because there is sufficient existing information to recommend that the site be included into CERCLIS based solely on the evaluation of the Surface Water Pathway.

TABLE 4-1 --SURFACE WATER OVERLAND/FLOOD MIGRATION COMPONENT SCORESHEET

Factor categories and factors	Maximum Value	Value Assigned	
Watershed Evaluated:			
Drinking Water Threat			
Likelihood of Release:			
1. Observed Release	550	550.0	
2. Potential to Release by Overland Flow:			
2a. Containment	10	0.0	
2b. Runoff	10	0.0	
2c. Distance to Surface Water	5	3.0	
2d. Potential to Release by Overland Flow [lines 2a(2b + 2c)]	35	0.0	
3.Potential to Release by Flood:			
3a. Containment (Flood)	10	0.0	
3b. Flood Frequency	50	0.0	
3c. Potential to Release by Flood (lines 3a x 3b)	500	0.0	
4. Potential to Release (lines 2d + 3c, subject to a maximum of 500)	500	0.0	
5. Likelihood of Release (higher of lines 1 and 4)	550		550.0
Waste Characteristics:			
6. Toxicity/Persistence	(a)	0.0	
7. Hazardous Waste Quantity	(a)	10.0	
8. Waste Characteristics	100		0.0
Targets:			
9. Nearest Intake	50	0.0	
10. Population:			
10a. Level I Concentrations	(b)	0.0	
10b. Level II Concentrations	(b)	0.0	
10c. Potential Contamination	(b)	0.0	
10d. Population (lines 10a + 10b + 10c)	(b)	0.0	
11. Resources	5	0.0	
12. Targets (lines 9 + 10d + 11)	(b)	0.0	
Drinking Water Threat Score:			
13. Drinking Water Threat Score [(lines 5x8x12)/82,500, subject to a max of 100]	100	0.0	
Human Food Chain Threat			
Likelihood of Release:			
14. Likelihood of Release (same value as line 5)	550	550.0	
Waste Characteristics:			
15. Toxicity/Persistence/Bioaccumulation	(a)	0.0	
16. Hazardous Waste Quantity	(a)	10.0	
17. Waste Characteristics	1000	0.0	
Targets:			
18. Food Chain Individual	50	0.0	
19. Population			
19a. Level I Concentration	(b)	0.0	
19b. Level II Concentration	(b)	0.0	
19c. Potential Human Food Chain Contamination	(b)	0.0	
19d. Population (lines 19a + 19b + 19c)	(b)	0.0	
20. Targets (lines 18 + 19d)	(b)		0.0
Human Food Chain Threat Score:			
21. Human Food Chain Threat Score [(lines 14x17x20)/82500, subject to max of 100]	100		0.0
Environmental Threat			
Likelihood of Release:			
22. Likelihood of Release (same value as line 5)	550		550.0
Waste Characteristics:			
23. Ecosystem Toxicity/Persistence/Bioaccumulation	(a)	5000000.0	
24. Hazardous Waste Quantity	(a)	100.0	
25. Waste Characteristics	1000		100.0

Targets:			
26. Sensitive Environments			
26a. Level I Concentrations	(b)	250.0	
26b. Level II Concentrations	(b)	0.0	
26c. Potential Contamination	(b)	0.0	
26d. Sensitive Environments (lines 26a + 26b + 26c)	(b)	0.0	
27. Targets (value from line 26d)	(b)		250.0
Environmental Threat Score:			
28. Environmental Threat Score [(lines 22x25x27)/82,500 subject to a max of 60]	60		60.0
Surface Water Overland/Flood Migration Component Score for a Watershed			
29. Watershed Score[c] (lines 13+21+28, subject to a max of 100}	100		60.00
Surface Water Overland/Flood Migration Component Score			
30. Component Score (S_{sw})[c] (highest score from line 29 for all watersheds evaluated)	100		60.00

[a] Maximum value applies to waste characteristics category
[b] Maximum value not applicable
[c] Do not round to nearest integer

SCRATCH PAD NOTES:

PATHWAY/SOURCES: SOURCES

Scoresheet Line#: Not Applicable
Notes: XRF detections of Cr ranging from 166 parts per million (ppm) to 316 ppm in stained concrete behind dry cleaning machine.
Documentation: Field data in trip report

PATHWAY/SOURCES: SURFACE WATER OVERLAND – ENVIRONMENTAL

Scoresheet Line#: 1
Notes: Observed release to South Utoy Creek and Utoy Creek assumed.
Documentation: Assumption

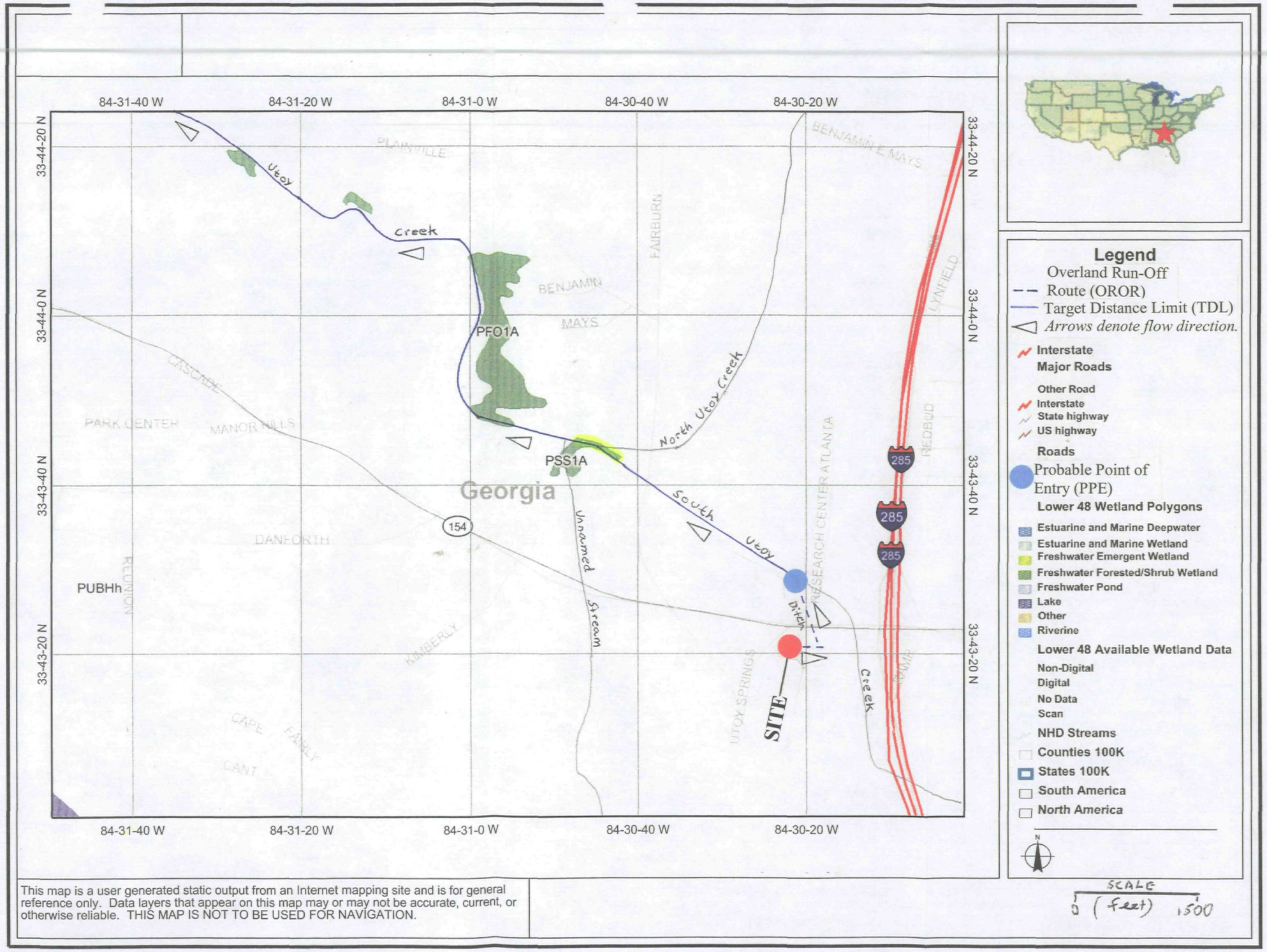
Scoresheet Line#: 26a
Notes: Forested/shrub wetland frontage surrounding area of confluence of South Utoy Creek and North Utoy Creek within the TDL is >0.1 mile corresponding to a Table 4-24 value of 25. 25x10=250 for an assumed Level I release to surface water.
Documentation:

PSA SCORING DATA
CASCADE SPRINGS CLEANER

Source	Evidence of Source	Pathway/ Threat	Substance	**LR**	Evidence of Release	HWQ Factor Value	Evidence of HWQ	tox/per/bio or ecotox/ecoper/ ecobio or tox/mob	Product	**WC**	**T**	Evidence of T	**Pathway Score (uncapped)**	Critical information
Stained concrete	XRF Detection	SW/Env	Cr	**550**	Assumed	100	Assumed release (Therefore HWQ >=100 per HRS Sect. 2.4.2.2)	5000000	5E+08	**100**	**250**	>0.1 mi. of known Target wetlands assumed Level I	**166.6666667**	XRF detection of Cr ranging from 166 parts per million (ppm) to 316 ppm in stained concrete behind dry cleaning machine. Forested/shrub wetland frontage surrounding area of confluence of South Utoy Creek with North Utoy Creek is approximately 900 feet (i.e. >0.1 mi.), as indicated by Wetlands Digital Data, accessed on June 10, 2010 @ http://www.fws.gov/nwi/ . This area was confirmed in the field to remain undeveloped.

Figure 3 – Wetlands map showing the Overland Run-off Route (OROR), the Probable Point of Entry (PPE) of overland run-off into a perennial surface water body, and the Target Distance Limit (TDL).

Wetlands frontage along TDL totals 900 ft. = 0.2 miles in yellow-highlighted area.
Table 4-24 of the HRS assigns a wetlands Rating Value of 25 corresponding to a total length of wetlands of 0.1-1 mile.



This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.