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October 17, 2005

Mr. R. Andrew Garner
Pike Nursery Holdings, LLC
4020 Steve Reynolds Boulevard
Norcross, Georgia 30093

RE: UPDATE OF A PHASE I ENVIRONMENTAL SITE ASSESSMENT,
PIKE NURSERY
6100 LAWRENCEVILLE HIGHWAY
TUCKER, GEORGIA 30278
SECOR PN: B3OT.90706.00.0001

Dear Mr. Garner:

SECOR International Incorporated (SECOR) is pleased to present the findings of our Phase I Environmental Site Assessment (ESA) Update for the above-referenced property (subject property). The subject property was previously assessed by SECOR, as described in our April 26, 2004 report entitled, *Final Phase I Environmental Assessment Report, Pike Nursery, 6100 Lawrenceville Highway, Tucker, Georgia 30278*. Additionally, the sampling results of SECOR's assessment for possible asbestos-containing materials (ACM) and lead-based paint (LBP) at the subject property was described in our May 12, 2004 report entitled, *Final Non-Destructive Asbestos Survey And Lead-Based Paint Assessment For Pike Nursery, 6100 Lawrenceville Highway, Tucker, Georgia.* This Phase I Update is intended to be utilized in conjunction with the aforementioned reports for the subject property. The prior ESAs are included as Attachment 1 to this update report.

PURPOSE

The purpose of this Phase I ESA update was to characterize changes in the condition of the subject property and adjacent properties relative to environmental concerns and to identify recognized environmental conditions (RECs) and historical RECs (HRECs), as defined in American Society for Testing and Materials (ASTM) Standard Practice E1527-00 Environmental Site Assessments: Phase I Environmental Site Assessment Process, which has occurred since the previous ESA was performed. The work performed by SECOR included a walk-through inspection of the property, a review of current agency databases, and interviews with persons knowledgeable of the general condition of the subject property. The services were provided in general accordance with SECOR's September 15, 2005 proposal (Number B3-05-650) titled "Proposal for a Phase I ESA Update, Pike Nursery Holdings LLC dba Pike Family Nurseries, 6100 Lawrenceville Highway, Tucker, Georgia 30278".

SECOR was requested to perform an updated investigation on 14.13 acres of the 24-acre parcel discussed in the prior ESA.

REVIEW OF PRIOR ESA

The prior ESA reported that the subject property consisted of approximately 24 acres of land developed with a commercial retail nursery facility and wholesale retail nursery supply facilities. SECOR observed an approximate 5,708 square-feet main retail building and an approximately 65,000 square-feet attached greenhouse during the 2004 site reconnaissance. In addition, an approximate 6,500 square feet interior wholesale building and several sunscreen-covered areas totaling approximately 50,000 square feet for plants were observed on the eastern side of the property, and an approximately 1,800 square feet building containing the exterior wholesale sales with approximately 2,500 square feet of greenhouse space was located to the southwest. Exterior surfaces of the Site consisted primarily of asphalt-paved parking lots, which contained storm drains, perimeter ditches around the interior wholesale building, and a stormwater pond. The storm drains around the main building extended under and around the greenhouses and outside patio areas. Landscaping existed along the northern boundary of the subject property.

Based on observations made during SECOR's site reconnaissance, interviews with Pike employees, and governmental agency reviews, no recognized environmental conditions were identified. However, the following environmental concerns were identified:

- Pike's use of chemicals to treat plants had the potential to impact the soil. While no information was identified which suggested that a release of hazardous substances has occurred, a release of hazardous substances was possible. The collection of soil samples could provide additional data to aid in the assessment of whether there has been a release at the Site. Pike sells hazardous chemicals such as herbicides, pesticides, and fungicides. Reportedly, Pike sells plants which may contain herbicides, pesticides, and fungicides applied by the grower, and on rare occasions small quantities of these products may be applied on-site to unhealthy plants. Mr. King, a 29-year Pike employee, stated that the plant inventory is maintained on-site only for short periods prior to sale, thereby reducing the need to apply chemicals. There is a small potential for small quantities of these materials to wash from the plants into the sewer system via the stormwater drains and the stormwater grate located on the Site. Wastewater from the sewer system is transferred to one of two county owned wastewater treatment facilities. In addition, if the water contains chemicals they may be deposited in drainage areas.

- The current practice of disposing of empty pesticide containers in the dumpster may represent potential CERCLA liability to the Site. There is no threshold for chemicals in regards to CERCLA liability. The CERCLA liability may potentially be reduced by reviewing and revising Pike practices in regards to disposal of hazardous materials.

- Suspect ACM can be considered potential environmental concern at the Site. An ACM survey will be performed on the building by SECOR. As of the date of this report, SECOR has not yet received the laboratory analytical results of the sampling. The details and results of the ACM survey will be reported in the Non-destructive Asbestos Survey and Lead-Based Paint Assessment for 6100 Lawrenceville Highway.

- Due to the age of the buildings on the Site, a visual inspection for the presence of LBP was performed. Suspect components were identified and on interior painted floors. SECOR performed a LBP survey on the buildings at the Site. As of the date of this report, SECOR has not yet received the laboratory analytical results of the sampling. The details and results of the LBP survey will be reported in the Nondestructive Asbestos Survey and Lead-Based Paint Assessment for 6100 Lawrenceville Highway.

- A previous environmental site assessment performed by ERM reported and SECOR's 2004 site visit confirmed that the facility utilized three on-site buried septic tanks and associated drain fields. The septic tanks represent a potential pathway for contaminates to migrate through Site soil and groundwater.

- SECOR noted that in the area behind the interior wholesale building, a concrete dike containing a 250-gallon AST containing used oil and a 500-gallon AST containing diesel fuel were in close proximity to the septic drainfield. No staining was observed by SECOR around the ASTs. Based on their proximity to the septic drainfeild, should a release occur, used oil or diesel fuel could potentially contaminate groundwater.

- SECOR noted fair housekeeping practices within the maintenance area in the interior wholesale building during the site visit. Spent batteries should be kept on pallets above the concrete floor until pickup by the recycling contractor.

- The site included an operating well noted by SECOR, which represents a potential pathway for the migration of contaminants to the groundwater.

During the ACM and LBP assessment, eighteen bulk samples from the gypsum wallboard/joint compound, vinyl floor tiles/mastic adhesives, stipple ceiling applications, vinyl floor elevation strips, and 2-foot by 4-foot ceiling tiles were collected and laboratory analyzed by Analytical Environmental Services, Inc. (AES) using Polarized Light Microscopy (PLM) for asbestos. The roofing felts, flashings, and mastic adhesives on the main sales building were assumed to be ACM, and no samples were collected. Five bulk samples of suspected LBP were collected based on the color, location, texture, and paint history. The areas of the samples collected included the exterior protective yellow bollards (interior warehouse sales building), interior painted floors in the interior warehouse sales and main buildings, exterior doors in the interior warehouse sales building, and interior walls in the interior warehouse sales building. The suspect LBP samples were laboratory analyzed by AES using EPA Method SW-846-7420. Based on the analytical results, SECOR concluded and recommended the following:

- The ACM building survey and sampling conducted at the subject property assumed one building material contained asbestos (exterior roofing felts, flashings, mastics) and identified one building component with identified asbestos (vinyl floor tile and mastics containing 3% and 10% Chrysotile in tile and mastic, respectively). The identified and assumed building materials were in good condition, and could be placed under an Operations and Maintenance (O&M) Program. The building was

not scheduled for demolition or renovation, and the asbestos containing material could remain in place until such time. If the material was disturbed via demolition or remodeling activities, it would be required to be removed and disposed by a State of Georgia licensed asbestos abatement contractor.

- The LBP assessment found that of the five paint chip samples collected, none contained lead in excess of the HUD definition of lead-based paint (0.5 percent lead by weight).

SITE RECONNAISSANCE

Ms. Amy L. Stanton of SECOR conducted a reconnaissance of the subject property on September 26, 2005. Weather conditions during the visit were light rain with ambient daytime air temperatures of approximately 85-degrees Fahrenheit. There were no weather related site access restrictions encountered during the site visit.

Access to and a description of the subject property was provided by Mr. Andrew Garner, CFO of Pike Nursery Holdings, LLC (PNH), the subject property owner. The subject property consisted of an approximately 14.13-acre parcel of land. The subject property was developed with an approximate 5,708 square-feet main retail building and an approximately 65,000 square-feet attached greenhouse area on the western portion and an approximate 6,500 square feet interior wholesale / stone and aquatic retail building and several sunscreen-covered areas totaling approximately 50,000 square feet for plants on the eastern side of the property. The subject property was utilized for the retail sales of residential and commercial landscaping and gardening supplies. Pike Family Nurseries was the sole occupant of the subject property. SECOR's site reconnaissance, which was unassisted, consisted of a walk around the perimeter of the subject property and the interior portions of the buildings located on the subject property. Access was provided to all areas of the buildings, with the exception of the interior of the maintenance shop area. A site plan showing the current configuration of the subject property is provided in Attachment 2.

The interior of the buildings consisted of office areas, restrooms, and product storage areas. The retail building was constructed on a slab-on-grade foundation with concrete block and brick walls. The ceiling was exposed sheet metal, and the floor was mostly painted concrete with floor tiles in the restroom. The interior wholesale / stone and aquatic retail building was constructed on a slab-on-grade foundation with interior and exterior wood siding. The ceiling was exposed sheet metal, and the floor was mostly painted concrete with floor tiles in the restroom. Interior office spaces contained vinyl floor tiles, gypsum wallboard, and stipple ceiling applications. The attached greenhouse areas were mainly open space with asphalt pavement, and the sun-screened covered areas contained concrete walkways and exposed areas of soil. There were no floor drains noted in the interior of the buildings.

The interior wholesale / stone and aquatic retail building contained a maintenance shop area in the southwest corner of the building. This area was used to service various tractors that store incoming plants and other home improvement items that are sold at the facility. Five 5-gallon containers of hydraulic fluid and gasoline, tires, and other small containers of maintenance fluids were observed adjacent to the exterior of the maintenance shop. To the

south of the maintenance shop area, SECOR observed a 250-gallon used oil AST and a 500-gallon diesel AST. The two ASTs were situated within a bermed concrete/masonry dike, and no petroleum staining was noted within the diked area or on the ground surface surrounding the dike.

SECOR observed several containers of fungicides, pesticides, and herbicides on shelves in the retail building. The containers are for retail sale only. Reportedly, insecticides, fungicides, and fertilizers have been applied to the plant materials as a normal part of plant maintenance for retail purposes throughout the years. However, no wide scale fumigation, spraying, manufacturing or mixing of fungicides, pesticides, herbicides, and fertilizers has been performed at the subject property. As previously reported, empty containers of insecticides, fungicides, and fertilizers were disposed in the solid waste receptacles. No spills or releases were reported for the chemicals stored on-site. No other hazardous materials were noted, with the exception of household quantities of janitorial cleaners. No potential environmental risks were observed in association with these cleaning supplies.

During the exterior reconnaissance, SECOR observed the asphalt paved parking area of the subject property to be in poor condition (severe cracking) with minimal amounts of vehicle oil stains. Portions of the asphalt-paved parking area were covered by retail supplies (i.e. rocks, bags of soil, bags of concrete, bags of mulch, sod, and plants). The areas not covered by pavement were naturally vegetated. Reportedly, all stormwater drains located throughout the subject property and the concrete stormwater flumes to the south of the sunscreen-covered areas discharge to an on-site detention area in the central portion of the subject property. No staining or stressed vegetation was observed in the detention area. Solid waste was disposed of in dumpsters located throughout the subject property. Two dumpsters for plants and packing materials (serviced by Allied Waste Services) were observed to the south of the retail greenhouses, and a dumpster for recyclable paper and cardboard (serviced bi VISY) was also observed in the same area. A hydraulic trash compactor for diseased, insect infested, broken or damaged goods was located adjacent to the east side of the sunscreen-covered areas, and a dumpster for general waste, such as cardboard and paper, was located to the northeast of the sunscreen-covered areas. No staining or evidence of improper disposal was observed on the ground surface surrounding the solid waste receptacles.

Reportedly, the subject property was connected to the Gwinnett County water system, and an irrigation well system on the south adjoining exterior wholesale property was used for a supplemental water source. Wastewater generated in the subject property buildings was reportedly discharged to on-site septic systems. Georgia Power provided electrical services to the subject property. A pole-mounted transformer was observed on the western portion of the subject property, and a pad-mounted transformer was observed on the central portion of the subject property adjacent to the interior wholesale / stone and aquatic retail building. No staining or evidence of leakage was observed on the ground surface beneath the transformers. A natural gas-powered backup generator was also observed adjacent to the interior wholesale / stone and aquatic retail building. Roof mounted AC systems were used to cool the offices within, and large fans were used throughout the interior of the greenhouses. The buildings were heated with natural gas.

Land use adjacent to and surrounding the subject property is mixed commercial and residential. No chemical storage areas, stained soils, or stressed vegetation were observed or reported on the adjacent properties during the reconnaissance. The subject property was bound to the north by Lawrenceville Highway, and beyond by Bill Head Funeral Home and residences; to the northeast by Blanchard's Interiors and Maaco Auto Painting; to the east by Azalea Road, and beyond by residences; to the south by a mobile home park and Pike Nursery Exterior Wholesale; and to the west by a vacant lot (used for parking for the subject property) and Pounds Drive, and beyond by residences and an area under construction.

Photographs taken during the site reconnaissance are included as Attachment 3.

INTERVIEWS

Prior to initiating the ESA Update, SECOR discussed the project with representatives of PNH, the "user" of this report. PNH did not report any specialized knowledge or experience which would be considered material to potential environmental risks in connection with the subject property.

SECOR contacted Mr. Andrew Garner, CFO of PNH (the subject property owner). Mr. Garner stated that the original subject property parcel was purchased by Pike Nursery in 1973. He also stated that he has not been made aware of any pending, threatened, or past:

- Litigation relevant to hazardous substances or petroleum products in, on, or from the subject property;
- Administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or
- Notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.

SECOR was requested by PNH not to interview the managers and/or employees at the subject property.

RECORDS REVIEW

SECOR obtained an environmental database report during the original Phase I ESA effort from Environmental Data Resources, Inc. (EDR), dated April 1, 2004. SECOR's review of the EDR database did not identify any properties within one mile of the subject property that could have potentially affected the subject property except for the Lawrenceville Land and Building (Craig's Grocery) located at 6170 Lawrenceville Highway. This facility occupied an adjacent property boundary near the western boundary of the Site. This facility had a suspected release on-file in 1992. SECOR performed a detailed file review of this facility at the Georgia Department of Natural Resources Underground Storage Tank Division. The facility received a No Further Action letter from DNR on January 5, 1998. In addition, the

facility's potentiometric map indicated that prevailing groundwater flow at the site was to the south-southwest, away from the subject property. Based on the no further action status and the hydraulically down or cross-gradient position of the facility relative to the subject property, this facility did not represent a potential environmental concern to the subject property. According to the current database, no other releases have been reported for this facility.

To assess the current regulatory status of the subject property and neighboring properties, SECOR contracted EDR to perform an updated environmental regulatory agency database review. A copy of the database report is included in Attachment 4. The environmental databases reviewed, definition of these databases, and the corresponding search distances used are indicated in the database review report.

The regulatory agency database search report lists a number of sites identified as "orphaned" or unmappable. EDR was unable to confirm the physical locations of these properties relative to the site or assess whether they were located within the designated search radius. SECOR independently reviewed the locations of these "orphan" properties, to the extent possible, using various maps and our knowledge of the site area. Any of the "orphan" properties determined to be within the designated search radius were included in our evaluation of their potential to result in a recognized environmental risk relative to the site. None of the "orphan" properties presented known recognized environmental risk to the subject property.

The subject property was not identified in any of the environmental databases accessed.

There were no new listings that appeared on the database, except for the following:

MAACO Auto Painting & Body Works is located adjacent to the northeast of the subject property. The facility was identified as a RCRA small quantity generator of hazardous waste. According to the EDR database report, there have been no reported violations or releases associated with the hazardous waste activities at the facility. Based on the lack of reported violations or releases, this facility is not considered a potential environmental risk.

The Ben Gober Landfill is located approximately 2,500 feet to the north of the subject property. The facility was identified as a State Hazardous Waste Site (SHWS). According to the EDR database report, lead from the site is present in groundwater and soil at concentrations exceeding regulatory reporting criteria, and cleanup activities were being conducted for source materials, soil, and groundwater. Based on SECOR's review of the file for the site at the Georgia Environmental Protection Division (GEPD), Hazardous Waste Management Branch Office, groundwater at the site flows to the north/northeast and away from the subject property. Based on the hydraulically downgradient position, this facility is not considered a potential environmental risk.

SECOR also performed a file review of a facility listed in the original and the current database. The Crymes Landfill was identified as a SHWS and CERCLIS site, located approximately 2,600 feet west of the subject property. Based on SECOR's review of the file for this site at the GEPD Hazardous Waste Management Branch Office, groundwater at the site flows to the north/northeast and away from the subject property. Based on the

hydraulically downgradient position, this facility is not considered a potential environmental risk.

SECOR did not identify potential environmental risks associated with the subject property during the environmental database review.

SECOR submitted written requests or contacted the Gwinnett County Health, Fire, and Building Departments for information pertaining to environmental-related issues (permits, inspections, violations, tanks, hazardous materials, emergency responses, etc.) regarding the subject property. The fire department and health department did not have any additional information on file for the subject property since the previous ESA. The building department had not responded at the time of this report.

CONCLUSIONS AND RECOMMENDATIONS

SECOR has performed an update of the Phase I ESA of the Pike Nursery located at 6100 Lawrenceville Highway in Tucker, Georgia. The update was performed in conformance with the scope and limitations of ASTM Practice E 1527-00. This assessment revealed no significant changes in the environmental condition of the subject property since the original Phase I ESA was completed. However, the following environmental concerns were identified for the subject property, which is only a portion of the property included in the original Phase I ESA:

- Previously identified ACM should be maintained under an O&M Program. If the ACM was disturbed via demolition or remodeling activities, it would be required to be removed and disposed by a State of Georgia licensed asbestos abatement contractor.

- The subject property was utilized for the retail sales of residential and commercial landscaping and gardening supplies. Reportedly, Pike sells plants which may contain herbicides, pesticides, and fungicides applied by the grower, and on occasion, small quantities of these products may be applied on-site to unhealthy plants. Although there were no reports or evidence of a release of hazardous substances at the subject property, there is a potential for herbicides, pesticides, and fungicides to have impacted the soil and/or groundwater at the subject property.

- Proper disposal of empty or full pesticide, herbicide, or fungicide containers should be practiced at the subject property.

- A previous environmental site assessment performed by ERM reported, and SECOR's 2004 site visit confirmed, that the subject property utilized two on-site buried septic tanks and associated drain fields for the restrooms and sinks within the subject property buildings. No floor drains were observed within the subject property buildings, and no evidence of improper disposal of hazardous materials was observed at the subject property. The septic tanks represent a potential pathway for contaminates to migrate through soil and groundwater if improper disposal of hazardous materials were to occur.

- SECOR noted fair housekeeping practices within the exterior area of the maintenance shop. However, SECOR was unable to access the interior of the maintenance shop during the site visit. SECOR also observed a concrete dike containing a 250-gallon AST containing used oil and a 500-gallon AST containing diesel fuel for maintenance of tractors adjacent to the maintenance shop area. No staining was observed by SECOR around the ASTs. Proper storage of hazardous materials and waste and petroleum products should be continued at the subject property for prevention of a possible release of contaminants to soil and/or groundwater.

SECOR appreciates the opportunity to provide environmental services to Pike Nursery Holdings, L.L.C. If you have any questions or require additional service, please do not hesitate to contact us at (804) 271-0763.

Sincerely,

SECOR International Incorporated

Amy L. Stanton
Environmental Scientist

Russell K. Balderson
Senior Scientist

ALS/RKB/pef

Enclosures:	Attachment 1	Previous Phase I ESA Report and Non-Destructive Asbestos And Lead-Based Paint Assessment
	Attachment 2	Figures
	Attachment 3	Site Photographs
	Attachment 4	Environmental Agency Database Report

ATTACHMENT 1
PREVIOUS PHASE I ESA REPORT AND NON-DESTRUCTIVE ASBESTOS AND LEAD-BASED PAINT ASSESSMENT

FINAL
PHASE I ENVIRONMENTAL
SITE ASSESSMENT REPORT

PIKE NURSERY
6100 Lawrenceville Highway
Tucker, GA 30278
21OT.04009.00.0001

Submitted by
SECOR International Incorporated
20 Mansell Court East, Suite 275
Roswell, Georgia 30076

For

Roark Capital Group
The Proscenium
1170 Peachtree Street, 18th Floor
Atlanta, Georgia 30309

April 26, 2004

Prepared by:

_____
Sara L. Gilbert, G.I.T.
Staff Geologist

Reviewed by:

_____
Michael D. McKibben, P.G.
Project Manager

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1.0 INTRODUCTION

This report presents the results of the Phase I Environmental Site Assessment (ESA) of the Pike Nursery located at 6100 Lawrenceville Highway in Tucker, Gwinnett County, Georgia performed by SECOR International Incorporated (SECOR). Figure 1 presents a Site Location Map. This ESA was performed at the request of Mr. Jake LaJoie, Roark Capital Group (Roark Capital), Atlanta, Georgia in conjunction with a pending financial transaction involving the Site.

Mr. Nathaniel P. Hardee, Jr. of SECOR International, Inc. (SECOR) in Atlanta, Georgia completed the Phase I ESA. Mr. Hardee is an experienced professional in the field of Phase I ESAs and related environmental investigations.

1.1 OBJECTIVE

The objective of this ESA was to perform appropriate inquiry into the past ownership and uses of the Site consistent with good commercial or customary practice as outlined by the American Society of Testing and Materials (ASTM) in Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, Designation E 1527-00. The purpose of this assessment was to identify, to the extent feasible, recognized environmental conditions on the Site or within the study area defined by the ASTM standard that potentially have and/or may cause an adverse environmental impact to the Site.

1.2 SCOPE OF WORK

The Phase I ESA was performed in accordance with the scope of work provided as part of ASTM standard protocols of practice. This scope consisted of a visual reconnaissance of the Site, interviews with personnel knowledgeable of the Site, a historical review of entities previously occupying the Site, and a review of the practically reviewable pertinent records of local, state, and federal agencies. Currently, Pike Nursery occupies the Site. SECOR employed the following methods while performing this Phase I ESA:

- traversed the exterior areas of the property
- visually observed interior accessible areas expected to be used by occupants or the public, maintenance and repair areas, utility areas, and a representative sample of occupant spaces
- a drive-by field reconnaissance of neighboring properties
- interviewed people considered knowledgeable about site operations and historic uses of the Site and adjacent properties

- reviewed previous environmental reports as provided by Roark Capital Group
- reviewed agency files
- reviewed an available environmental records provided by Environmental Data Resources, Inc (EDR) that meets the search requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-00

2.0 ENVIRONMENTAL SETTING

2.1 REGIONAL PHYSIOGRAPHIC CONDITIONS

The Site and surrounding area is located within the Southern Piedmont Physiographic Province. Erosional forces shaped the topography into broad, convex ridge tops dissected by drainage ways. Many streams, creeks, and lakes are located in the area. Slopes tend to be steep near major streams and small on mountains. According to the 7.5-minute topographic quadrangle map for the area (Stone Mountain, Georgia Quadrangle, 1997), the approximate elevations of the area surrounding the Site range from 1070 to 1000 feet. The approximate elevation of the Site is 1021 feet above the NGVD 1929.

2.2 REGIONAL GEOLOGY

Geologically, the Site and surrounding area are located in the Southern Piedmont and Brevard Fault Zone of the Greater Atlanta Area. The Brevard Fault Zone is defined by McConnell and Abrams to be a zone of early ductile to late brittle shearing. Consequently the high strain associated with the lateral movement of the fault resulted in the metamorphism of the older sedimentary and volcanic rocks. Structurally, the area consists of synclines and anticlines that became deformed during successive deformational events and which were later subjected to intrusive plutons and diabase dikes.

Two majors event which emplaced post-metamorphic intrusive rocks occurred in the area; the first took place approximately 300 to 325 million years ago and the second approximately 180 to 230 million years ago. The older event formed Stone Mountain, a large granitic pluton, which is located southwest of the Site. The younger event formed diabase dikes that were intruded along tensional fractures. The Site lies in a zone of these intrusive features.

The rocks under the Site and surrounding area make up the Atlanta Group. The youngest is the Snellville Formation, which consists of a lower layer of schist, gneiss, quartzite, and amphibolite and an upper layer of quartzite termed the Lanier Mountain Quartzite. Beneath the Snellville Formation lies the Atlanta Group, which contains several other older formations consisting of gneisses, schists, quartzites, and amphibolites. The Lithonia Gneiss is younger than the Snellville Formation because it formed during an intrusive event in the Middle Paleozoic. The Lithonia Gneiss is characterized by an evenly banded biotite-quartz-feldspar gneiss, quartz-rich garnetiferous gneiss layers, and migmatic gneiss. The weathering of this formation produces the regolith on the Site. The area surrounding the Site also has several plutonic intrusions of granite, which were emplaced during the Carboniferous Era, and diabase dikes which were emplaced during the Mesozoic Era.

Regolith includes saprolite, which is an earthy decomposed rock developed by weathering of bedrock and soil. The regolith tends to hold a greater capacity of groundwater than the underlying bedrock. Groundwater commonly seeps vertically through the regolith and then flows horizontally along the bedrock layer. Joints and fractures resulting from deformation events are common in the areas bedrock and may serve as conduits for groundwater flow. Cressler and Thurmond believe the fractures observed in area rocks form by upward expansion of the rock column in response to erosional unloading.

2.3 REGIONAL HYDROGEOLOGY

The Piedmont and Blue Ridge Aquifer underlie the Site and surrounding area. Fractured granite, gneiss, schist, and quartzite make up the crystalline–rock aquifers. Typically, the crystalline-rock aquifers are unconfined. Because of intense weathering, regolith tends to have a greater capacity to store larger volumes of water than the underlying bedrock. According to Cressler, sites, high yielding wells are typically located in topographically low areas with thick residual soil cover whereas areas with relatively little soil cover, such as hilltops, tend to have low yielding wells. Water levels in the crystalline-rock aquifer are mainly affected by precipitation and evapotransperation, and locally by pumping.

Contact zones between rocks that are very resistant to weathering, such as granite, and rocks which weather rapidly, such as foliated rocks high in feldspar content, generally produce very large groundwater yields. Surface water supplies most of the municipal and industrial water needs.

The Site and other properties within the general area receive potable water from the Chattahoochee River. Additional water may be supplied by Yellow Creek and many other small streams in the county.

2.4 LOCAL SOIL AND GROUNDWATER CONDITIONS

According to the USDA Soil Survey of Gwinnett County, the Site's soil is Urban Land, eroded. This soil is formed from the weathering of quartz mica schist, granite gneiss, and mica schist and occurs in areas of narrow to moderately broad ridge tops. SECOR observed a brownish-red clay loam at the Site, which is typical of Urban Land soils due to the weathering of iron oxides.

Site surface soils tend to erode leaving small cavities or hollows. According to the USDA Soil Survey of Gwinnett County, the hazard of erosion is slight to moderate if the soil is cultivated or is left bare and unprotected. Most areas where this soil occurs were historically planted to cultivate cotton or corn, but the majority is now wooded. The Site is primarily covered by asphalt, concrete, or landscaping and therefore the risk of erosion is minimized.

According to the USGS 7.5 minute series topographic map of Stone Mountain, Georgia, the Site is located at an elevation of approximately 1021 feet above the NGVD1929. Available water capacity of the soil tends to be medium with moderate permeability. Groundwater flow would be expected to seep into the regolith, a layer of loose rock resting on bedrock, vertically then flow toward an unnamed creek southeast of the Site.

Surface drainage appears to be a function of the Sites' topography. When compared to the USGS topographic map, the Site appears not to have been modified during development. Figure 2 illustrates the expected surface water flow directions across the Site.

3.0 PROPERTY RECONNAISSANCE

SECOR performed a site reconnaissance of the Pike Nursery located at 6100 Lawrenceville Highway on March 31, 2004. Figure 2 presents a Site Vicinity Map. The Site is an approximately 24-acre parcel located in a commercial and residential setting. According to the Gwinnett Appraiser's Website, the Site's main building was initially constructed in the late-1950s, with additions to the property (interior and exterior whole buildings) occurring in 1974 and 1977, respectively. Weather conditions during the reconnaissance were clear and warm with ambient temperatures in the upper-60s. No weather-related restrictions were encountered and the reconnaissance of the Site was completed without incident. SECOR completed a walk-thru of the interior and exterior areas of the property, performed a drive-by field reconnaissance of neighboring properties, and interviewed people considered knowledgeable about site operations and historic uses of the Site and adjacent properties. SECOR interviewed Mr. McClendon James, District Manager, Pike Nursery as a reliable source of information regarding the Site and its' current and past operations.

The purpose of the reconnaissance was to identify recognized current conditions and land uses that may suggest potential environmental impacts to the Site. Such conditions, to the extent visible and accessible, include storage, disposal and treatment of solid and/or hazardous waste, storage tanks and other chemical containers, odors, pools of liquid, staining, drains, sumps, pits, ponds, lagoons, septic systems, wells, unusual soil disturbance, stressed vegetation, and electrical transformers. Photographs collected during the site reconnaissance are included in Appendix A.

3.1 SITE DESCRIPTION AND CURRENT USES

The property encompasses approximately 24 acres, and is bounded by Lawrenceville Highway to the north, undeveloped properties to the west across Pounds Drive, subcontracted land parcel, American Die Supplies and residential parcels to the southwest and south, respectively, and by commercial properties to the east. The property appears to have been slightly graded during development but generally slopes with the natural topography from the northwest to the south.

SECOR observed an approximate 5,708 square-feet main retail building and an approximate 65,000 square-feet attached greenhouse during the site reconnaissance. In addition, an approximate 6,500 square feet interior wholesale building and several sunscreen-covered areas totaling approximately 50,000 square feet for plants were observed on the eastern side of the property, and an approximate 1,800 square feet building containing the exterior wholesale sales with approximately 2,500 square feet of greenhouse is located to the southwest. Exterior surfaces of the Site consist primarily of asphalt-paved parking lots, storm drains, perimeter ditches around the interior wholesale

building and a stormwater pond. The storm drains around the main building extend under and around the greenhouses and outside patio areas. Landscaping existed along the northern boundary of the property.

No manufacturing operations are reported to be, or were observed to be conducted on the property at the time of the site inspection. The Site operates as a commercial retail nursery facility and wholesale retailer of nursery supplies. Retail operations involve stocking of consumer-packaged products containing hazardous chemicals such as herbicides, fungicides, and insectides (pesticides). According to Mr. McClendon James, plants sold at the facility may also contain small amounts of herbicides, fungicides, and insecticides from the grower. He told SECOR that pesticides, herbicides, fungicides, and/or insect ides may be applied to some unhealthy plants on-site but that large scale application of these materials is not performed at the Site. He told SECOR that it is the stores' general practice return large quantities of unhealthy plants to the grower if such a shipment were to arrive at the store. Fertilizers, lumber, and other assorted home-improvement products are also sold at the facility. A list of Pike Nurseries Approved Chemicals is provided in Appendix F.

Although the Site appeared to generally be in good condition, Site employees did not seem knowledgeable in the proper use and disposal of hazardous chemicals such as the products sold by Pike. SECOR did observe a hotline for MSDSs for 3E Company. Mr. James told SECOR that he did not know of a Hazardous Communication Program or of other training in proper use and/or disposal of hazardous materials.

SECOR was unable to determine if current Site procedures differed from Site practices prior to 1999, which was the amount of time Mr. James has been employed at the Site. According to Pike, current Site practices involve minimal use of pesticides, insecticides, herbicides, and fungicides however SECOR was unable to determine historic uses of these chemicals at the Site.

3.2 INTERIOR PROPERTY OBSERVATIONS

The property consists of a main retail building with a large product storage area, two restrooms, and a rear office area divided into three rooms. In addition, the property contains a separate retail building (interior wholesale) to the east with an attached sunscreen area and to the southwest, exists a smaller retail building (exterior wholesale) with a detached sunscreen area.

The main retail building was constructed in the late-1950s, with additions to the property (interior and exterior whole buildings) occurring in 1974 and 1977, respectively. The buildings are slab-on-grade with interior and exterior wood siding. The roofing system is comprised of bituminous mopped-multi-ply felts. Fluorescent light fixtures were located along the ceiling and appeared to be in good condition with no evidence of leakage. Floors

were painted in several locations within the building. The remainder of the interior floors consisted of unsealed and unpainted concrete. SECOR observed no floor drains within the sales floor section of the building. Insulated HVAC ducting was observed throughout the ceiling. The Site uses a roof mounted AC system to cool the offices within, and large fans are used throughout the interior of the greenhouse.

The adjacent interior wholesale building was reportedly constructed in 1959 as slab-on-grade with interior and exterior metal siding. Roofing system is comprised of sheet metal. Fluorescent light fixtures were located along the ceiling and appeared to be in good condition with no evidence of leakage. Floors were painted in several locations within the building. The remainder of the interior floors consisted of unsealed and unpainted concrete. SECOR observed no floor drains within the sales floor section of the building. Insulated HVAC ducting was observed throughout the ceiling. Interior offices were comprised of vinyl floor tiles/mastic adhesives, gypsum wallboard/joint compounds, and stipple ceiling applications. The Site uses a roof mounted AC system to cool the offices within, and large fans are used throughout the interior of the greenhouses.

In addition, the interior wholesale building contained a maintenance shop in the rear of this building. This area was used to service various tractors that store incoming plants and other home improvement items that are sold at the facility. Within this section, a 250-gallon double-walled AST containing unused oil was noted, along with three 5-gallon containers of hydraulic fluid. Slight staining was noted on the concrete floor in this area as a result of transfer operations. Various box-sized batteries were also noted in this area, and were staged on bare concrete awaiting pickup.

The exterior wholesale building was reportedly constructed in 1977 as slab-on-grade with interior and exterior wood paneling. Roofing system is comprised of roofing felts and flashings. Fluorescent light fixtures were located along the ceiling and appeared to be in good condition with no evidence of leakage. The remainder of the interior floors consisted of unsealed and unpainted concrete. SECOR observed no floor drains within the building. Interior offices were comprised of carpet on concrete, gypsum wallboard/joint compounds, and stipple ceiling applications. The Site uses a window-mounted AC system to cool the offices within, and large fans are used throughout the interior of the greenhouses.

Herbicides, pesticides, and fungicides were observed stored along shelves in their original manufactured containers with no evidence of leakage. Small amounts of cleaning products were observed in the office area in their original manufacturer containers with no appearance of leaks. Plants were also observed inside the building and may contain minor amounts of pesticides or herbicides from the grower. SECOR observed the Material Safety Data Sheets (MSDSs) phone number (1-800-451-8346) for 3E Company posted in the office area of the main retail building. 3E Company offers MSDS management services. No paper copies of MSDSs were available on-site.

One of the greenhouse areas was attached to the main retail building. Access was gained by a door from the main building and from the open paths behind the greenhouse. The structure appears to be concrete slab-on-grade with a metal frame covered with plastic or plexi-glass. Several skylights were located throughout the roofing system of the greenhouse. Fluorescent light fixtures hung from the ceiling were in good condition with no evidence of leakage. Several heating ducts venting to the outside were located on the sides of the greenhouse. Heating units were mounted near the side of the building. The Site employs the use of electric heaters in the greenhouse area during times of cold weather.

SECOR was informed by maintenance personnel that Davis Oil supplies diesel fuel and various oils to the Site, and that Universal Recycling collects the used oil on an on-call basis. Used batteries are reportedly collected by American Batteries for recycling.

Plants located in the main building and some exterior portions of the property are watered by hand and/or watered via on-site sprinkler system by Site personnel. A stormwater pond was located in the central portion of the Site. Mr. James told SECOR that the stormwater pond is connected to the county sewer system. Asphalt-paving covers much of the exterior surfaces of the Site, in addition to some landscaping. SECOR observed some cracks in the asphalt-paved parking lot during the site reconnaissance. No stressed vegetation was noted in the area of the surface runoff point in the northwestern section of the property.

3.2.1 Interior Storage Areas

The Pike Nursery main building is located in the northwestern portion of the property. Consumer packaged hazardous chemicals, such as herbicides, pesticides, insecticides and fungicides, are available for purchase in this building. SECOR observed the herbicides, pesticides, insecticides and fungicides, stocked on shelves with no evidence of leakage and in their original manufacturer's containers. Small amounts of cleaning products were observed in a small storage closest adjacent to the office area. The floor consisted of painted or bare concrete. Interior storage areas appeared to be in good condition. A list of Pike Nurseries Approved Chemicals is provided in Appendix F.

The Pike Nursery interior wholesale building is located in the central portion of the property. SECOR observed unused oils, batteries, and small amounts of petroleum stored in this building. SECOR also observed the herbicides, pesticides, insecticides and fungicides, stocked on shelves in this building with no evidence of leakage and in their original manufacturer's containers. Small amounts of cleaning products were observed in a storage closest close to the door. The floor consisted of bare concrete. Interior storage areas appeared to be in good condition. The 250-gallon AST containing unused oil previously discussed in Section 3.2 is located in this building.

The Pike Nursery exterior wholesale building is located in the southern portion of the property. Small amounts of petroleum products used to power small lawn equipment are stored in the garage area in close proximity to the building. SECOR did not observe herbicides, pesticides, insecticides and fungicides containers within this building. The floors consisted of carpet over concrete. Interior floors appeared to be in good condition, with no visible staining.

3.2.2 Interior Waste Disposal Areas

No interior waste disposal areas exist on the Site.

3.2.3 Interior Subsurface Structures

No floor drains were located by SECOR or mentioned by administrative or maintenance personnel during the site visit. Water service is provided by Gwinnett County. According to Mr. James, domestic waste is transferred to three separate septic sewer systems located near each building on the property. See Section 3.3.3 for further discussion on the fate of the Site's wastewater.

3.3 EXTERIOR PROPERTY OBSERVATIONS

The Site consists of approximately 24 acres of commercial land located in a commercial and residential area of incorporated Gwinnett County. Access to the Site is gained through northern access driveways on Lawrenceville Highway and Pounds Road to the west. The main building is located in the northwestern portion of the property with an attached greenhouse on the east side of the building. The interior wholesale building is located in the central portion of the property, and the exterior wholesale building is located in the southern portion of the property. An asphalt-paved parking lot covers most of the Site including under the sunscreen-covered area. The Site has landscaping adjacent to Lawrenceville Highway. Much of the surfaces of the Site were covered with plants or other home improvement merchandise that limited the ability to visual observation pavement for the presence of stains. Grass sod is located in the central section of the parking lot and was being watered during the site reconnaissance. Power lines ran along the northern boundary of the property along Lawrenceville Highway.

3.3.1 Exterior Storage Areas

Additional plants and home-improvement materials were located on an asphalt pad located between the main building and interior wholesale building within of the Property. Sod was also staged in these sections. Broken wooden pallets were stored adjacent to the Waste Management dumpsters located in the southeastern section of the main building, and in the eastern section of the exterior warehouse building, near Lankford Drive. Consumer

packaged fertilizers were kept on shelves in the main building greenhouse and in the outside covered plant area. A trailer containing wheat straw was located in the eastern section of the interior wholesale greenhouse area. Plants were located outside around the perimeter of the main building, in the northern section of the interior wholesale building, and in the northern section of the exterior wholesale building.

Outside the interior wholesale building SECOR observed a 250-gallon used oil AST and a 500-gallon diesel AST. The two ASTs were situated within a bermed concrete/masonry dike, and no petroleum staining was noted within the dike area or outside the dike. Site personnel stated that they service tractors outside the maintenance room, in close proximity to the ASTs and that the oil is collected into oil drain pans and transfer manually into the used oil AST. In addition, used tractor tires are stored adjacent to the ASTs while awaiting pickup by disposal contractors. No soil staining was noted around the tire storage area during the site reconnaissance.

Outside the exterior wholesale building, a small garage and operating water well was noted in the northeastern corner of the property. According to Mr. James, water from this well is used to irrigate plants awaiting sale at the property. The garage is used to house tractors used to transport plant throughout the facility, and according to maintenance personnel at no time are the tractors serviced at the garage area.

3.3.2 Exterior Disposal Areas

Office waste, discarded dead plants, and used broken wooden pallets are commonly disposed of in three dumpsters owned by the Waste Management located in various locations throughout the Site. Mr. Richard King, Pike Purchasing Manager who has been an employee of Pike for 29 years, and Mr. James provide information regarding chemical usage. They stated that small quantities of pesticides, herbicides, insecticides and fungicides containers are disposed of in the dumpsters on rare occasions. The hazardous waste regulations exclude residues in empty containers from regulation as hazardous wastes Ga. Rule 391*3-11-.07; 40 C.F.R. §261.7. The containers disposed of in the dumpsters most likely qualify as RCRA empty in accordance with 40 C.F.R. §261.7b(1)(i), which states that a container is considered “empty” if all the waste has been removed using the practices commonly employed to remove (e.g., pouring, spraying, etc.) and no more than one inch of residue remains on the bottom of the container or no more than 3 percent by weight remains in the container. There is, however, no threshold amount of chemicals released in landfills for CERCLA liability. Therefore, the disposal of even small quantities of pesticides, herbicides, insecticides, and fungicides in containers may be a potential environmental concern to the Site in regards to CERCLA liability.

No other exterior disposal areas were noted during the SECOR site inspection. SECOR did not observe any evidence of dumping, such as pits or mounds, on the Site during the site

reconnaissance. SECOR contacted Waste Management regarding solid waste pick-up at the Site. An administrative clerk at Waste Management informed SECOR that solid waste from the Site is transported to various Gwinnett County owned landfills.

3.3.3 Subsurface Structures

SECOR observed two storm drains located to the west and east of the plant screen area adjacent to the main building, three septic tanks in close proximity to each building on site, and one operational well in the southern section of the property near the exterior wholesale building. Mr. James told SECOR the on-site well and all septic tanks are in operation, and domestic water service is provided by the Gwinnett County Water System. He told SECOR that the on-site well is used for irrigation purposes only. Wastewater deposited in each of the septic tanks and leaches into adjacent fields . During the site reconnaissance of the septic tanks and adjacent leachfield, SECOR noted no stressed vegetation as a result of the possible introduction of pesticides or fertilizers within the septic system or floor drain located close to each building. The drain field in close proximity to the 250-gallon used oil and 500-gallon diesel ASTs behind the interior wholesale building was noted during the site visit.

SECOR observed that the- on-site septic systems were in operation at the time of the site visit . The septic system could represent a potential pathway for the migration of contaminants from wastewater and contaminants washed down the Site's drains.

3.3.4 Underground Storage Tanks

No evidence (fill pipes, vent pipes, dispensers, surface patches) which would indicate the presence of underground storage tanks (USTs) was identified during the SECOR reconnaissance of the Site. Mr. James reported that he did not know of any prior USTs at the Site.

3.3.5 Surface Water

An exterior concrete drain culvert leading to the stormwater pond in the southern portion of the property was observed during the field reconnaissance. SECOR did not observe a sheen or odors in the area of the drain culvert, nor in the pond area.

3.4 POLYCHLORINATED BIPHENYLS (PCBs)

Various pole and pad-mounted transformers owned and serviced by Walton EMC provides electrical power for the Site. No leakage of dielectric fluid was observed around or below the units. All transformer units are owned by Walton EMC and in a March 31, 2004 telephone discussion with Walton EMC engineering personnel, they informed SECOR that

all of the transformers under their ownership was either drained of the PCB-containing oil above 50 parts per billion, or were replaced with new units in 1990.

3.5 WATER SUPPLY AND SEWAGE DISPOSAL

Potable water for the Site and surrounding area will be provided by the Gwinnett County Water and Sewer Department. Water is supplied from the Chattahoochee River. Sewage disposal from the facility is discharged into the septic tanks located near each building on the property. Surface water and storm water runoff flows toward the stormwater pond in the central portion of the property via a drain culvert. The storm water runoff then flows toward a stormwater pond located outside the property boundary.

3.6 ADJACENT PROPERTY RECONNAISSANCE

The current immediate surrounding land use is best characterized as commercial and residential. The Site is bordered as follows:

- on the north by a residential and commercial land parcels
- on the east by Lankford Drive and further east exist commercial and undeveloped parcels
- on the west across Pounds Road by undeveloped parcels
- on the south by a trailer park and undeveloped parcels

4.0 HISTORICAL REVIEW

SECOR was presented with the Phase I Environmental Site Assessment (ESA) Update dated March 2001, on the facility at 6100 Lawrenceville Highway. No information was presented to SECOR to assess prior ownership prior to this transaction.

In accordance with the ASTM standards, SECOR reviewed aerial photographs, city directories, and building permits as historical sources of information regarding Site activities. SECOR also interviewed the Pike Nursery District Manager, Mr. McClendon James, as a source of historical information.

Historical sources reveal the Site was originally developed in 1959 and has been used as a Pike Nursery continuously since completion of construction activities in 1977.

4.1 AERIAL PHOTOGRAPH REVIEW

A summary of available historical aerial photographs (Appendix B) for the Site, and the surrounding area was reviewed but not ascertainable from the Gwinnett County Soil Stabilization and Conservation Service, Lawrenceville, Georgia, is provided below.

1949 Aerial Photograph
The Site appears to be undeveloped, wooded land. Lawrenceville Highway is depicted to the north as a two-lane road running east/west. No ponds or depressed areas were noted on the aerial photograph, and sparsely populated residential structures were observed on immediately adjacent properties to the east and west. Pounds Road to the west and Lankford Drive were not visible in this photograph. The remaining surrounding land use appears to be cleared vacant land to the north and south.

1955 Aerial Photograph
With the exception of increased residential growth to the north and east, the Site appears to be unchanged from the 1949 aerial photograph.

1966 Aerial Photograph
In the 1966 aerial photograph, the Site appears to be developed with one building. Adjacent properties to the north and east appear to be residential land. Pounds Road is visible to the west in this photograph. The property to the south appears to be vacant land.

1972 Aerial Photograph
The 1972 aerial photograph appears generally unchanged from the 1966 aerial photograph, except Lankford Drive is visible to the east of the Site.

1978 Aerial Photograph

The 1978 aerial photograph shows further growth on the western portion of the Site (additional building and greenhouses), to the east (additional greenhouse spaces), and to the south (small building and greenhouses), along with major clearing of the property further east. Commercial development is depicted in this photograph to the north across Lawrenceville Highway. In addition, development of a trailer park appears to the south, adjacent to the property boundary

1985-86 Aerial Photograph

In the 1986 aerial photograph, the Site appears to be similar to the present site conditions. The adjacent property to the southwest appears to be developed with a small commercial structure. Adjacent properties to the north, east and west appear to be unchanged from the 1978 photograph.

4.2 BUILDING PERMIT RECORD REVIEW

Building permits for the Site were not available for review at the Building Permits Office in Gwinnett County, Georgia. According to Building Inspection Department personnel at Gwinnett County, they informed SECOR personnel that no permits are on file regarding the Site due to the fact that the building was constructed before permits were permanently kept. Mr. James, District Manager for Pike, informed SECOR that the site started construction in the late 1950s and a review of relevant aerial photography support that statement.

4.3 SANBORN FIRE INSURANCE MAP REVIEW

No fire insurance maps (Sanborns) were available for review of the Site. A review by Environmental Data Resources (EDR) was performed on fire insurance maps within their archives, and no historical maps pertaining to the surrounding area of the Site was found. EDR possesses one of the most comprehensive historical map collections in the United States. In addition, the Gwinnett County Library system was researched and no Sanborn Maps were located within their database. SECOR also contacted the Atlanta Historical Society in Atlanta, Georgia for historical maps of the area. A clerk told SECOR that they did not have historical maps of Tucker, Georgia. Documentation of EDR's Sanborn Map search indicating "no coverage" is included as Appendix C.

4.4 CITY DIRECTORY REVIEW

SECOR reviewed city directories for Tucker, Georgia at the Dekalb County Central Library in Decatur, Georgia and the Atlanta Historical Society in Atlanta, Georgia. SECOR reviewed the sources as listed:

1950 Polk City Directory Tucker, Georgia
- 6100 Lawrenceville Highway – No Listing

1955 Polk City Directory Tucker, Georgia
- 6100 Lawrenceville Highway – No Listing

1960 Polk City Directory Tucker, Georgia
- 6100 Lawrenceville Highway – Pike Nursery

1965 Polk City Directory Tucker, Georgia
- 6100 Lawrenceville Highway – Pike Nursery

1976 Polk City Directory Tucker, Georgia
- 6100 Lawrenceville Highway – Pike Nursery

1980 Polk City Directory Tucker, Georgia
- 6100 Lawrenceville Highway – Pike Nursery

1985-1986 Polk City Directory Tucker, Georgia
- 6100 Lawrenceville Highway – Pike Nursery

The Site is located in an incorporated part of Tucker.

4.5 OWNERSHIP RECORD REVIEW

A chain-of-title was not conducted by SECOR, however, as previously stated, the Site is currently owned by Pike Nurseries, Inc. per the Gwinnett County Assessor's website.

4.6 PREVIOUS INVESTIGATIONS

SECOR was presented with a Phase I ESA Update conducted by Environmental Resource Management (ERM) dated March 2001, on the Site. Within the Phase I ESA report update, ERM identified no recognized environmental conditions however ERM noted the following environmental concerns:

- The site includes an operating well which represents a concern for the migration of contaminants to the groundwater. Additional information on how the wells were constructed and/or abandoned is needed to further address this potential concern.
- The on-site septic tank systems represent a concern for soil contamination from the discharge, over time, of limited amounts of pesticides, fertilizers or other potential pollutants. Inspection, sampling and/or removal of the system would address this concern.
- The site is a conditionally exempt small quantity generator of hazardous waste as a result of incidental disposal of pesticides. This minimal level of environmental regulation should be maintained by ensuring appropriate pesticide (and other potential hazardous wastes/pollutants) disposal procedures and employee training.

- The requirements for an OSHA Hazard Communication Plan and Material Safety Data Sheets are not well known by site personnel. Development of a Hazard Communication Plan appears to be warranted.
- One strip of suspect ACM wrap was observed on the HVAC system in the interior wholesale building. This material showed evidence of wear that could to the suspect ACM becoming friable, if disturbed.
- The temporary storage and dispensing of diesel fuel from a 55-gallon drum supported on pallets appeared to be unsafe and potentially hazardous to health and the environment. It is recommended that the storage and dispensing of combustible liquids be performed under the standards outlined in the National Fire Protection Association guidelines (NFPA 30).

SECOR submitted a GORA request to the Gwinnett County Department of Environmental Health via fax inquiring about the septic systems. SECOR also interviewed the District Manager of Pike Nursery, McClendon James during the site reconnaissance. SECOR observed a hotline number for the Material Safety Data Sheets posted in the office. Mr. James informed SECOR that Pike Nursery has containment procedures in-place in case of spill. He also told SECOR that spills occur very infrequently and that broken containers are returned to the manufacturer for store credit. In case of an incidental spill, site personnel use vermiculite or cat litter to clean up liquids. The wastes are placed in small 20-gallon drums or bags and are returned to their vendors.

A discussion of the hazardous wastes (pesticides, herbicides, insecticides and fungicides) in regards to landfilling is presented in Section 3.3.2 Exterior Disposal Areas. SECOR could not find evidence of the facilities status as a conditionally exempt generator of hazardous waste. The facility was not listed as a conditionally exempt small quantity generator (or conditionally-exempt large quantity generator) on the EDR report.

5.0 REGULATORY AGENCY LIST REVIEW

As a part of this assessment, SECOR reviewed updated federal and state environmental databases that identify environmental activities and problem sites. This data is a compilation of records from the United States Environmental Protection Agency (EPA) and the Georgia Department of Natural Resources (DNR), Environmental Protection Division (EPD), and Environmental Data Resources (EDR), and includes:

- U.S. Environmental Protection Agency (EPA) National Priority List (NPL): updated 2/06/04
- EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) List: updated 3/22/04
- EPA Resource Conservation and Recovery Information System-Treatment, Storage, and Disposal Facilities (RCRIS-TS): updated 1/19/04
- EPA RCRIS-Large and Small Quantity Hazardous Waste Generators (RCRIS-LQG and RCRIS-SQG): updated 1/19/04
- No Further Remedial Action Planned Sites (NFRAP): updated 3/22/04
- Georgia Active Solid Waste Facilities (SWF): updated 3/1/04
- Georgia Underground Storage Tanks (USTs): updated 1/14/04
- Georgia Leaking Underground Storage Tanks (LUSTs): updated 1/14/04
- Georgia Hazardous Sites Inventory (HSI): updated 1/6/04
- Emergency Response Notification System (ERNS): updated 1/26/04

The complete database listings prepared by EDR in report number 1162597.1r and a map showing the location of listed properties relative to the Site is presented in Appendix D. The Site was not included on any of these data base lists. The results of these reviews are summarized and discussed below.

5.1 NATIONAL PRIORITY LIST

The National Priorities List (NPL) is a list of contaminated sites that have been assigned for cleanup under the Federal EPA Superfund program. *Review of the NPL list identified no facilities within a one-mile radius of the Site.*

5.2 CERCLIS

The Comprehensive Environmental Response, Cleanup, and Liability Information System (CERCLIS) List is a historical data base list of contaminated sites which the EPA has or will evaluate to determine whether a particular site merits placement on the National Priorities List (NPL). *The review of the EPA CERCLIS list identified one facility (Crymes Landfill – 0.22 mile west) within one-half mile radius of the Site. SECOR reviewed files at the Georgia Department of Natural Resources – Environmental Protection Division, Hazardous Site*

Inventory regarding the identified property. A review of potentiometric maps indicated that groundwater flow at the site flows south/southeast, away from the Site, and potential environmental impact to the Site as a result of subsurface releases at the identified property is low.

5.3 RCRA-TREATMENT, STORAGE AND DISPOSAL FACILITIES LIST

The U.S. EPA's Resource Conservation and Recovery Act (RCRA) Program identifies and tracks hazardous waste from the point of generation to the point of disposal. This list identifies facilities that treat, store, or dispose of hazardous waste. *No facilities were identified within a one-half mile radius of the Site.*

5.4 RCRA LARGE AND SMALL QUANTITY GENERATORS

The EPA's RCRA Large and Small Quantity Generator List identifies and tracks hazardous waste from the point of generation to the point of disposal. This list includes large and small quantity generators of hazardous wastes. *No RCRA Small Quantity or Large Quantity Generators (SQG/LQG) were identified within a one-quarter mile radius of the Site.* However, in a review of the "orphan" listings, one site was identified on this list that was not plotted on the EDR database.

- *The Atlanta European Collision Repair located at 3807-B Lawrenceville Highway (0.2 mile east) was listed as a small quantity generator. Files reviewed at the Georgia DNR-EPD, Generator Compliance Section indicated that the site is currently in compliance with applicable regulation at this time.*

5.5 EMERGENCY RESPONSE NOTIFICATION SYSTEM (ERNS)

The Emergency Response Notification System (ERNS) is a national computer database used to store information on releases of oil and hazardous substances. The ERNS list identifies those facilities and/or locations that have been reported to the U.S. EPA under ERNS because of a release of potentially hazardous material. *The Site was not identified on the ERNS database.*

5.6 NO FURTHER REMEDIAL ACTION PLANNED SITES (NFRAP)

The No Further Action Planned Report (NFRAP), also known as the CERCLIS archive, contains information pertaining to sites that have been removed from the U.S. EPA's CERCLIS Database. NFRAP sites may be sites where, following an initial investigation, either no contamination was found, contamination was removed quickly without need for the site to be placed on the NPL, or the contamination was not serious enough to require federal Superfund action or NPL consideration. *No NFRAP sites were identified within a one-quarter mile radius of the Site.*

5.7 NON-HAZARDOUS SITE INVENTORY (NON-HSI)

The Non-HSI lists sites is a list of Sites that were not placed on the Georgia Priority list (Hazardous Site Inventory) because their hazard evaluation scores did not exceed the threshold levels for established for sites posing as an imminent threat to human health or the environment. *A total of four facilities were identified as Non-HSI within a 1-mile radius of the Site.*

- *Tucker Express located at 6310 Lawrenceville Highway approximately 2500 feet west-southwest of the Site. Based on the presumed groundwater flow direction (southwest), this facility does not represent a potential environmental concern to the Site.*

- *Catherine Banks Property – Tract 4 located at the NW corner of Jimmy Carter Blvd. and Lawrenceville Highway approximately 3315 feet west/northwest of the Site. Based on the presumed groundwater gradient (southwest), this facility does not represent a potential environmental concern to the Site.*

- *Gwinnett Festival Shopping Center located at 6425 Lawrenceville Highway approximately 3657 feet west of the Site. Based on the presumed groundwater gradient, this facility is cross gradient to the Site and does not appear to represent a potential environmental concern to the Site.*

- *Hunters Landing Apartments located at 4200 Jimmy Carter Blvd. approximately 3814 feet west/northwest of the Site. Based on the presumed groundwater gradient and the distance form the Site, this facility does not appear to represent a potential environmental concern to the Site.*

5.8 RCRA ADMINISTRATIVE ACTION TRACKING SYSTEM (RAATS)

The RAATS database provides information regarding RCRA violators and the results of any action taken by the U.S. EPA against the violator. Included in this database is information such as issue date (notice of violation), site contact person, and final amount paid by the RCRA violator. *The Site was not listed in this database.*

5.9 TOXIC RELEASE INVENTORY SYSTEM (TRIS)

Section 313 of the Emergency Planning and Community Right-to-Know (also known as Title III) of the Superfund Amendments and Reauthorization Act (SARA) of 1986 (Public Law 99-499) requires EPA to establish an inventory of toxic chemical emissions from certain facilities. The purpose of Section 313 is to inform the public of the presence and/or possible releases of chemicals in their communities. *The Site was not identified on the TRIS database.*

5.10 GEORGIA SOLID WASTE FACILITIES (SWF)

The Georgia Solid Waste Facilities List is concerned with the handling of solid waste and includes locations identified with solid waste landfilling or associated activities involving the handling of solid waste. The presence of a site on this list does not necessarily indicate existing environmental contamination but rather the potential. *No SWF sites were reported on the database within a one-half mile radius of the Site.*

5.11 GEORGIA UNDERGROUND STORAGE TANK REPORT (RST)

The Georgia Underground Storage Tank Report is a comprehensive listing of all registered active and inactive underground storage tanks located within the State of Georgia. Inclusion on this list indicates the presence of stationary tanks and therefore the potential for environmental problems. It does not necessarily indicate existing problems. One *site was listed within the applicable one-quarter mile radius. The following is a summary of the UST site listed in the database:*

- *Lawrenceville Land and Building (Craig's Grocery) located at 6170 Lawrenceville Highway. See section 5.12 for details. This is also the address for the identified LUST site.*

5.12 GEORGIA LEAKING UNDERGROUND STORAGE TANK REPORT (LUST)

The Georgia Underground Storage Tank (LUST) report is a comprehensive listing of all registered leaking underground storage tanks located within the State of Georgia. *One*

LUST site was identified in the database within a one-half mile radius of the Site. SECOR field verified the LUST site listed in the EDR database and the following is a summary of the facility:

- *Lawrenceville Land and Building (Craig's Grocery) located at 6170 Lawrenceville Highway. This facility occupies an adjacent property boundary near the western boundary of the Site. This facility had a suspected release on-file in 1992. SECOR performed a detailed file review of this facility at the Georgia Department of Natural Resources Underground Storage Tank Division. The facility received a No Further Action letter from DNR on January 5, 1998. In addition, the facility's potentiometric map indicated that prevailing groundwater flow at the site is to the south southwest, away from the subject property. See 6.0 for further discussion.*

5.13 GEORGIA HAZARDOUS SITES INVENTORY (HSI)

The Georgia Hazardous Sites Inventory is a comprehensive listing of those facilities that are deemed as potentially hazardous to the public health and welfare by the GA DNR. *The Site, nor any adjacent properties, was listed on this database listing. There were no sites listed on the HSI within a one-mile radius of the Site.*

6.0 REGULATORY AGENCY FILE REVIEW

SECOR reviewed files at the Georgia Department of Natural Resources Underground Storage Tank Division (DNR) for the Lawrenceville Land and Building (Craig's Grocery) located at 6170 Lawrenceville Highway. The facility received a No Further Action Letter on January 5, 1998. A copy of the NFA letter for this facility is included in Appendix E.

Based on the no further action status and the hydraulically down or cross-gradient position of the identified facilities to the Pike Nurseries, these facilities do not represent a potential environmental concern to the Site.

7.0 PRELIMINARY ASBESTOS SCREENING

Asbestos Containing Material is often located under floor tiles and mastic adhesives, on hot water pipe insulation, lay-in ceiling tiles, roofing felts, flashings, and perimeter mastics, insulation, glues, and other materials in the office area. The use of ACMs was curtailed in the late 1970s. According to historical information obtained during the site investigation, the Site's main building located on the Pike Nursery property was initially constructed in the late-1950s, with additions to the property (interior and exterior whole buildings) occurring in 1974 and 1977, respectively. Due to the age of the buildings, ACM may be considered an environmental concern. A visual observation for asbestos-containing building materials was performed by Mr. Nathaniel P. Hardee, Jr. of SECOR on April 2, 2004. During the visual survey, the following conditions were noted:

- The interior wholesale building is a butler-type building with a roofing system comprised of skeletal fiberglass insulation. Vinyl floor coverings, linoleum floor coverings, gypsum wallboard and joint compounds and interior ceiling applications were noted.
- The main wholesale building is a block/brick building with a roofing system comprised of skeletal fiberglass insulation. Vinyl floor coverings, linoleum floor coverings, gypsum wallboard and joint compounds and interior ceiling applications were noted.
- The HVAC system within the interior wholesale building is composed of metal skin with suspect insulation wrap material around the joints.

No destructive bulk sampling for asbestos was conducted as part of this assessment. ACMs may be considered an environmental concern until confirmatory testing is performed by an Environmental Protection Agency Certified Asbestos Inspector. The Federal Occupational Safety and Health Administration (OSHA) under 29 CFR 1926.1101 Occupational Exposure to Asbestos (Construction Standard), Section K - Communication of Hazards, requires building and facility owners to communicate information concerning asbestos hazards in construction activities in order to facilitate compliance with the standard. Asbestos-containing construction materials are defined as any material with an asbestos content of greater than 1 percent (>1%). The regulation also implies a Due Diligence of building or facility owners who have knowledge or have contracted for services concerning asbestos activities to notify all individuals who may come in contact with ACM or presumed asbestos-containing material (PACM) in buildings constructed before 1980.

SECOR performed an ACM survey on the buildings at the Site. As of the date of this report, SECOR has not received the laboratory analytical results from the ACM samples. Details and results of the ACM survey will be discussed in the Final Non-Destructive Asbestos Survey and Lead-Based Paint Assessment for 6100 Lawrenceville Highway by SECOR.

8.0 RADON RISK DATA EVALUATION

The Georgia Department of Natural Resources conducted a study in which 3 sites in Gwinnett County in 1988 were screened for radon. The sites were screened for in conjunction with the U.S. EPA, conducted a 1988-89 radiation survey of Gwinnett County. According to the results, a total of 3 indoor radon samples were averaged was approximately 1.60 picocuries per liter (pCi/L). The U.S. EPA lists Gwinnett County as Zone 1 for residential indoor air concentrations greater than 4.0 pCi/L. The US EPA alert level is 4.0 pCi/L for residential indoor air concentrations. The Occupational Safety and Health Administration (OSHA) have established a workplace permissible exposure limit (PEL) of 7.5 pCi/L.

The Site lies within the highest geologic potential for radon gas. According to GA DHR, there is no scientific model to determine radon gas contamination without independent testing. The statewide survey conducted in 1988-89 was valid for large populations and not meant to be construed as specific countywide counts because of concentration variances. Therefore, the only definitive means of determining the radon levels at a specific location is to conduct a radon study on-site. No site specific testing was conducted at the Site as part of this work scope as the site has no basements and is used as a commercial facility.

9.0 LEAD BASED PAINT ASSESSMENT

Mr. Nathaniel P. Hardee, Jr. performed a preliminary visual inspection for potential Lead Based Paint (LBP) on April 1, 2004. Mr. Hardee observed the following conditions during the visual inspection:

- Suspect components were identified as painted walls, structural beams and ceilings in the main wholesale and interior wholesale buildings.

SECOR sampled the buildings at the Site for LBP containing materials. As of the date of this report, SECOR has not received the laboratory analytical results for Site. The details and results of the LBP survey will be reported in the Final Non-Destructive Asbestos Survey and Lead-Based Paint Assessment by SECOR.

10.0 WETLANDS

Wetlands cannot be definitively identified through visual observation alone. Defensible wetland delineations require taxonomic classification of site vegetation, an investigation into the surface and subsurface hydrology of the subject property, and identification of hydric soils. This level of delineation is outside of the scope or work for this assessment. However, SECOR did review the National Wetland Inventory map (U.S. Fish and Wildlife Service 1998). The reviewed resource map did not show wetlands or floodplains at the subject property or at adjacent properties.

No distinct evidence indicating the presence of wetlands on the subject property was observed during the site visit. Based on the above documents, the field observations, and the fact that no new development is planned at the property, a wetlands delineation does not appear to be warranted at this time.

11.0 SUMMARY AND CONCLUSIONS

On March 31, 2004, SECOR performed a Phase I Environmental Assessment of the Pike Nursery (Pike) located at 6100 Lawrenceville Highway in Tucker, Gwinnett County, Georgia. The key areas investigated during the site visit were: aboveground storage tanks, underground storage tanks, PCB containing electrical equipment, hazardous materials, hazardous waste, pesticides, air emissions, water, waste water, storm water, solid waste, existing soil or groundwater contamination, historical data, adjacent properties, regulatory review, prior land use applications, suspect asbestos containing building materials (non-scope), radon gas (non-scope), and wetlands (non-scope). Based on observations made during the Site reconnaissance, interviews with Pike employees, and governmental agency reviews, no recognized environmental conditions were identified:

Based on observations made during the Site reconnaissance and governmental agency reviews, the following environmental concerns were identified:

- Pike's use of chemicals to treat plants has the potential to impact the soil. While no information was identified which suggests that a release of hazardous substances has occurred, a release of hazardous substances is a possibility. The collection of soil samples could provide additional data to aid in the assessment of whether there has been a release at the Site. Pike sells hazardous chemicals such as herbicides, pesticides, and fungicides. Mr. James informed SECOR that Pike sells plants which may contain herbicides, pesticides, and fungicides applied by the grower. He also told SECOR that on rare occasions small quantities of these products may be applied on-site to unhealthy plants however he was unable to estimate the quantity of chemicals applied. The chemical usage information provided by Mr. James was confirmed by a statement made by Mr. King, a 29-year Pike employee. Mr. King stated that the plant inventory is maintained on-site only for short periods prior to sale, thereby reducing the need to apply chemicals. There is a small potential for small quantities of these materials to wash from the plants into the sewer system via the stormwater drains and the stormwater grate located on the Site. Wastewater from the sewer system is transferred to one of two county owned wastewater treatment facilities. In addition, if the water contains chemicals they may be deposited in drainage areas.
- The current practice of disposing of empty pesticide containers in the dumpster may represent potential CERCLA liability to the Site. There is no threshold for chemicals in regards to CERCLA liability. The CERCLA liability may potentially be reduced by reviewing and revising Pike practices in regards to disposal of hazardous materials.
- Suspect ACM can be considered potential environmental concern at the Site. An ACM survey will be performed on the building by SECOR. As of the date of this report, SECOR has not yet received the laboratory analytical results of the sampling. The details and results of the ACM survey will be reported in the Non-desctructive

Asbestos Survey and Lead-Based Paint Assessment for 6100 Lawrenceville Highway.

- Due to the age of the buildings on the Site, a visual inspection for the presence of LBP was performed. Suspect components were identified and on interior painted floors. SECOR performed a LBP survey on the buildings at the Site. As of the date of this report, SECOR has not yet received the laboratory analytical results of the sampling. The details and results of the LBP survey will be reported in the Non-destructive Asbestos Survey and Lead-Based Paint Assessment for 6100 Lawrenceville Highway.
- A previous environmental site assessment performed by ERM reported and a SECOR's site visit confirmed that the facility utilizes three on-site buried septic tanks and associated drain fields. The septic tanks represent a potential pathway for contaminates to migrate through Site soil and groundwater.
- SECOR noted that in the area behind the interior wholesale building, a concrete dike containing a 250-gallon AST containing used oil and a 500-gallon AST containing diesel fuel are in close proximity to the septic drainfield. No staining was observed by SECOR around the ASTs. Based on their proximity to the septic drainfeild, should a release occur, used oil or diesel fuel could potentially contaminate groundwater. .
- SECOR noted fair housekeeping practices within the maintenance area in the interior wholesale building during the site visit. Spent batteries should be kept on pallets above the concrete floor until pickup by the recycling contractor.
- The site includes an operating well noted by SECOR, which represents potential pathway for the migration of contaminants to the groundwater.
- Suspect ACM can be considered a potential environmental concern at the Site. An ACM survey was performed by SECOR on April 13, 2004. The ACM survey included eighteen bulk samples from the gypsum wallboard/joint compound, vinyl floor tiles/mastic adhesives, stipple ceiling applications, vinyl floor elevation strips, and 2-foot by 4-foot ceiling tiles. The results of the ACM survey indicated that no friable materials were identified; however, non-friable materials that were found included interior floor tiles and mastics in the main building with 3 and 10 percent asbestos (chysotile), respectively.

The conclusions arrived at by SECOR were made through interpretation of historical information and visual observation of on-site conditions at the date of this inspection.

12.0 LIMITATIONS

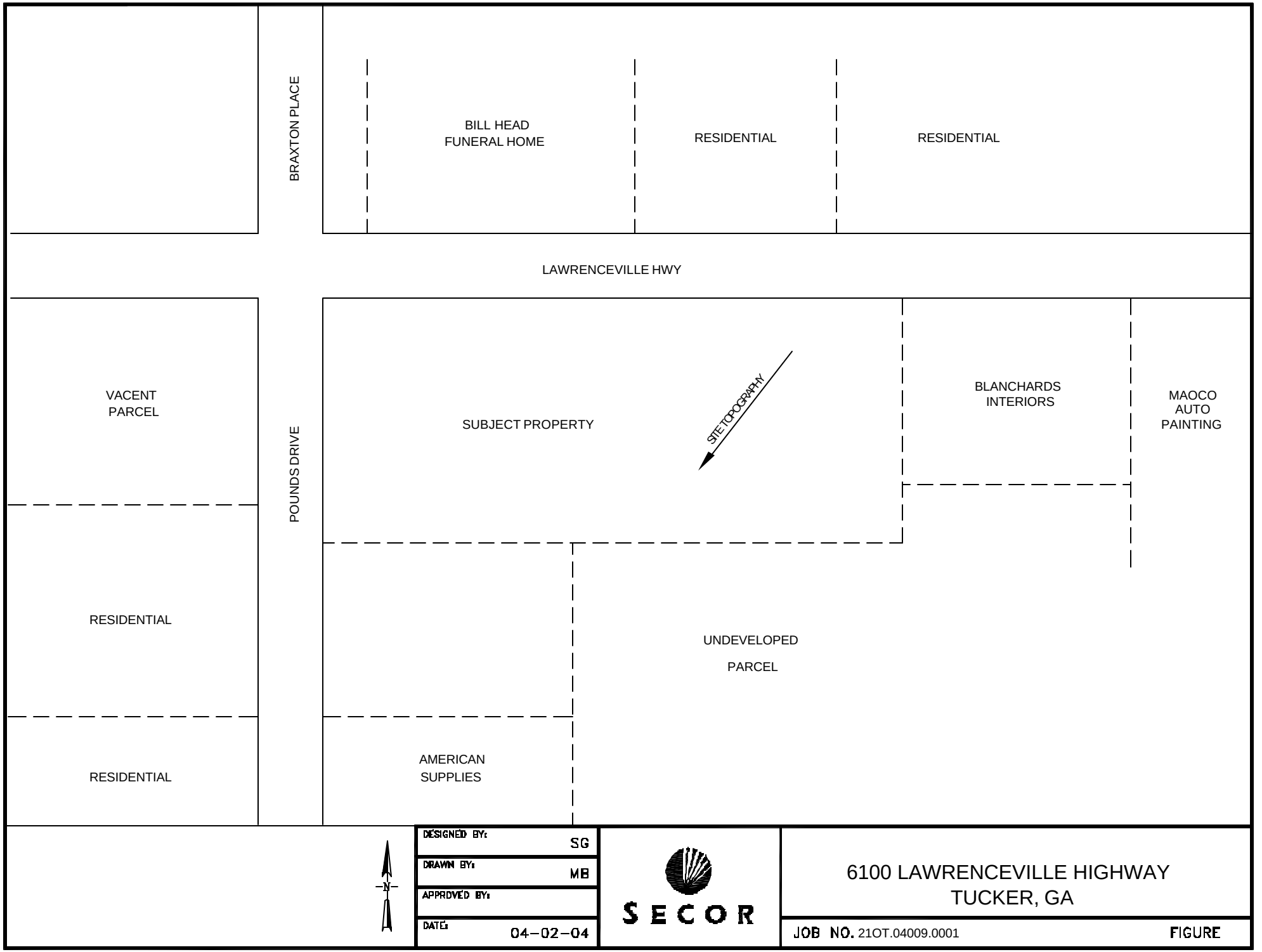
The conclusions presented in this report are professional opinions based on data described in this report. These opinions have been arrived at in accordance with currently accepted hydrogeologic and engineering standards and practices applicable to this location, and are subject to the following inherent limitations:

1. SECOR derived the data in this report primarily from visual inspections, examination of records in the public domain, and interviews with individuals having information about the site. The passage of time, manifestation of latent conditions, or occurrence of future events may require further study at the site, analysis of the data, and reevaluation of the findings, observations, and conclusions in the report.
2. The data reported and the findings, observations, and conclusions expressed in the report are limited by the scope of work. The scope of work was prescribed by ASTM Practice E 1527-00 and was agreed to by the client.
3. Because of the limitations stated above, the findings, observations, and conclusions expressed by SECOR in this report are not, nor should not be, considered an opinion concerning the compliance of any past or present owner or operator of the site with any federal, state, or local law or regulation.
4. No warranty or guarantee, whether express or implied, is made with respect to the data reported of findings, observations, and conclusions that are based solely upon site conditions in existence at the time of investigation.
5. SECOR Phase I ESA Reports present professional opinions and findings of a scientific and technical nature. The report shall not be construed to offer legal opinion or representations as to the requirements of, nor compliance with, environmental laws, rules, regulations, or policies of federal, state, or local government agencies. Any use of the Phase I report constitutes acceptance of the limits of SECOR's liability. SECOR's liability extends only to its client and not to any other parties who may obtain the Phase I report.
6. The conclusions presented in this report are professional opinions based on data described in this report. They are intended only for the purpose, site location, and project indicated. This report is not a definitive study of contamination at the site and should not be interpreted as such. An evaluation of subsurface soil and groundwater conditions was not performed as part of this investigation. No sampling or chemical analyses of structural materials or other media was completed as part of this study unless explicitly stated.
7. This report is based, in part, on unverified information supplied to SECOR by third-party sources. While efforts have been made to substantiate this third-party information, SECOR cannot guarantee its completeness or accuracy.

13.0 REFERENCES

Reports and Documents Reviewed:

- Environmental Regulatory Database, Report No. 1162597.1r, Pike Nurseries, 6100 Lawrenceville Highway, Tucker, Georgia, Environmental Data Resources (EDR) April 1, 2004.
- Geology of the Greater Atlanta Region, McConnell, Keith I. and Abrams, Charlotte E., Department of Natural Resources, Environmental Protection Division, Georgia Geological Survey, 1984.
- Ground Water in the Greater Atlanta Region; Cressler, Thurmond, and Hester; Department of Natural Resources, Environmental Protection Division, Georgia Geological Survey.
- Historical Aerial Photographs dated 1949, 1955, 1966, 1972, 1978, and 1985-1986; U.S. Department of Agriculture - Soil Stabilization and Conservation Service, Gwinnett County, Georgia.
- Phase I Environmental Site Assessment Update, 6100 Lawrenceville Highway, Tucker, Georgia; Environmental Resources Management March 2001.
- Radon; Gwinnett County Extension Office; last updated September 30, 2000, http://www.griffin.peachnet.edu/ga/gwinnett/FACS/Radon/radon.htm.
- Record Details Search of Site, Gwinnett County Appraiser's Website, 6100 Lawrenceville Highway, Last Updated March 15, 2004.
- USGS 7.5-minute Topographic Quadrangle Map (Stone Mountain, GA Quadrangle, dated 1981).


BRAXTON PLACE
BILL HEAD
FUNERAL HOME
RESIDENTIAL
RESIDENTIAL
LAWRENCEVILLE HWY
VACENT
PARCEL
POUNDS DRIVE
SUBJECT PROPERTY
SITE TOPOGRAPHY
BLANCHARDS
INTERIORS
MAOCO
AUTO
PAINTING
RESIDENTIAL
UNDEVELOPED
PARCEL
RESIDENTIAL
AMERICAN
SUPPLIES
N
DESIGNED BY: SG
DRAWN BY: MB
APPROVED BY:
DATE: 04-02-04
SECOR
6100 LAWRENCEVILLE HIGHWAY
TUCKER, GA
JOB NO. 21OT.04009.0001
FIGURE

Analytical Environmental Services, Inc.

Date: *23-Apr-04*

CLIENT:	Secor International	**Client Sample ID:**	RR1
Lab Order:	0404A30	**Collection Date:**	4/21/2004 4:20:00 PM
Project:	Pike Nursery		
Lab ID:	0404A30-001	**Matrix:**	SOIL

Analyses	Result	Rpt. Limit	Qual	Units	DF	Date Analyzed
CHLORINATED PESTICIDES, TARGET COMPOUN		**SW8081A**				Analyst: **JMZ**
4,4´-DDD	BRL	3.3		µg/Kg	1	4/23/2004 12:41:00 PM
4,4´-DDE	BRL	3.3		µg/Kg	1	4/23/2004 12:41:00 PM
4,4´-DDT	BRL	3.3		µg/Kg	1	4/23/2004 12:41:00 PM
Aldrin	BRL	1.7		µg/Kg	1	4/23/2004 12:41:00 PM
alpha-BHC	BRL	1.7		µg/Kg	1	4/23/2004 12:41:00 PM
alpha-Chlordane	4.0	1.7		µg/Kg	1	4/23/2004 12:41:00 PM
beta-BHC	BRL	1.7		µg/Kg	1	4/23/2004 12:41:00 PM
delta-BHC	BRL	1.7		µg/Kg	1	4/23/2004 12:41:00 PM
Dieldrin	BRL	3.3		µg/Kg	1	4/23/2004 12:41:00 PM
Endosulfan I	BRL	1.7		µg/Kg	1	4/23/2004 12:41:00 PM
Endosulfan II	BRL	3.3		µg/Kg	1	4/23/2004 12:41:00 PM
Endosulfan sulfate	BRL	3.3		µg/Kg	1	4/23/2004 12:41:00 PM
Endrin	BRL	3.3		µg/Kg	1	4/23/2004 12:41:00 PM
Endrin aldehyde	BRL	3.3		µg/Kg	1	4/23/2004 12:41:00 PM
Endrin ketone	BRL	3.3		µg/Kg	1	4/23/2004 12:41:00 PM
gamma-BHC	BRL	3.3		µg/Kg	1	4/23/2004 12:41:00 PM
gamma-Chlordane	2.5	1.7		µg/Kg	1	4/23/2004 12:41:00 PM
Heptachlor	BRL	1.7		µg/Kg	1	4/23/2004 12:41:00 PM
Heptachlor epoxide	BRL	1.7		µg/Kg	1	4/23/2004 12:41:00 PM
Methoxychlor	BRL	17		µg/Kg	1	4/23/2004 12:41:00 PM
Toxaphene	BRL	170		µg/Kg	1	4/23/2004 12:41:00 PM
Surr: Decachlorobiphenyl	96.2	11.2-135		%REC	1	4/23/2004 12:41:00 PM
Surr: Tetrachloro-m-xylene	84.2	16.4-135		%REC	1	4/23/2004 12:41:00 PM
CHLORINATED HERBICIDES		**SW8151A**		**(SW3550)**		Analyst: **JMZ**
2,4,5-T	BRL	17		µg/Kg	1	4/23/2004 12:20:00 PM
2,4,5-TP (Silvex)	BRL	17		µg/Kg	1	4/23/2004 12:20:00 PM
2,4-D	BRL	17		µg/Kg	1	4/23/2004 12:20:00 PM
2,4-DB	BRL	17		µg/Kg	1	4/23/2004 12:20:00 PM
Dalapon	BRL	33		µg/Kg	1	4/23/2004 12:20:00 PM
Dicamba	BRL	17		µg/Kg	1	4/23/2004 12:20:00 PM
Dichlorprop	BRL	17		µg/Kg	1	4/23/2004 12:20:00 PM
Dinoseb	BRL	17		µg/Kg	1	4/23/2004 12:20:00 PM
MCPA	BRL	660		µg/Kg	1	4/23/2004 12:20:00 PM
MCPP	BRL	660		µg/Kg	1	4/23/2004 12:20:00 PM
Surr: DCAA	107	29.1-134		%REC	1	4/23/2004 12:20:00 PM
METALS, TOTAL		**SW6010B**		**(SW3050B)**		Analyst: **CDW**
Antimony	BRL	4.08		mg/Kg	1	4/23/2004 1:05:00 PM
Arsenic	BRL	4.08		mg/Kg	1	4/23/2004 1:05:00 PM
Beryllium	BRL	2.04		mg/Kg	1	4/23/2004 1:05:00 PM

Qualifiers:	*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	N	Analyte not NELAC certified	P	NELAC analyte certification pending
	Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: *23-Apr-04*

CLIENT:	Secor International	**Client Sample ID:**	RR1
Lab Order:	0404A30	**Collection Date:**	4/21/2004 4:20:00 PM
Project:	Pike Nursery		
Lab ID:	0404A30-001	**Matrix:**	SOIL

Analyses	Result	Rpt. Limit	Qual	Units	DF	Date Analyzed
METALS, TOTAL		**SW6010B**		**(SW3050B)**		Analyst: **CDW**
Cadmium	BRL	2.04		mg/Kg	1	4/23/2004 1:05:00 PM
Chromium	14.1	2.04		mg/Kg	1	4/23/2004 1:05:00 PM
Copper	16.3	2.04		mg/Kg	1	4/23/2004 1:05:00 PM
Lead	21.1	4.08		mg/Kg	1	4/23/2004 1:05:00 PM
Nickel	6.39	4.08		mg/Kg	1	4/23/2004 1:05:00 PM
Selenium	BRL	4.08		mg/Kg	1	4/23/2004 1:05:00 PM
Silver	BRL	2.04		mg/Kg	1	4/23/2004 1:05:00 PM
Thallium	BRL	4.08		mg/Kg	1	4/23/2004 1:05:00 PM
Zinc	80.3	4.08		mg/Kg	1	4/23/2004 1:05:00 PM
TOTAL MERCURY		**SW7471A**		**(SW7471A)**		Analyst: **BB**
Mercury	BRL	0.0848		mg/Kg	1	4/23/2004 11:17:00 AM

Qualifiers:	*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	N	Analyte not NELAC certified	P	NELAC analyte certification pending
	Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: *23-Apr-04*

CLIENT:	Secor International	**Client Sample ID:**	RR2
Lab Order:	0404A30	**Collection Date:**	4/21/2004 4:35:00 PM
Project:	Pike Nursery		
Lab ID:	0404A30-002	**Matrix:**	SEDIMENT

Analyses	Result	Rpt. Limit	Qual	Units	DF	Date Analyzed
CHLORINATED PESTICIDES, TARGET COMPOUN		**SW8081A**				Analyst: **JMZ**
4,4´-DDD	BRL	3.3		µg/Kg	1	4/23/2004 1:11:00 PM
4,4´-DDE	BRL	3.3		µg/Kg	1	4/23/2004 1:11:00 PM
4,4´-DDT	BRL	3.3		µg/Kg	1	4/23/2004 1:11:00 PM
Aldrin	BRL	1.7		µg/Kg	1	4/23/2004 1:11:00 PM
alpha-BHC	BRL	1.7		µg/Kg	1	4/23/2004 1:11:00 PM
alpha-Chlordane	1.8	1.7		µg/Kg	1	4/23/2004 1:11:00 PM
beta-BHC	BRL	1.7		µg/Kg	1	4/23/2004 1:11:00 PM
delta-BHC	BRL	1.7		µg/Kg	1	4/23/2004 1:11:00 PM
Dieldrin	BRL	3.3		µg/Kg	1	4/23/2004 1:11:00 PM
Endosulfan I	BRL	1.7		µg/Kg	1	4/23/2004 1:11:00 PM
Endosulfan II	BRL	3.3		µg/Kg	1	4/23/2004 1:11:00 PM
Endosulfan sulfate	BRL	3.3		µg/Kg	1	4/23/2004 1:11:00 PM
Endrin	BRL	3.3		µg/Kg	1	4/23/2004 1:11:00 PM
Endrin aldehyde	BRL	3.3		µg/Kg	1	4/23/2004 1:11:00 PM
Endrin ketone	BRL	3.3		µg/Kg	1	4/23/2004 1:11:00 PM
gamma-BHC	BRL	3.3		µg/Kg	1	4/23/2004 1:11:00 PM
gamma-Chlordane	BRL	1.7		µg/Kg	1	4/23/2004 1:11:00 PM
Heptachlor	BRL	1.7		µg/Kg	1	4/23/2004 1:11:00 PM
Heptachlor epoxide	BRL	1.7		µg/Kg	1	4/23/2004 1:11:00 PM
Methoxychlor	BRL	17		µg/Kg	1	4/23/2004 1:11:00 PM
Toxaphene	BRL	170		µg/Kg	1	4/23/2004 1:11:00 PM
Surr: Decachlorobiphenyl	77.1	11.2-135		%REC	1	4/23/2004 1:11:00 PM
Surr: Tetrachloro-m-xylene	74.3	16.4-135		%REC	1	4/23/2004 1:11:00 PM
CHLORINATED HERBICIDES		**SW8151A**		**(SW3550)**		Analyst: **JMZ**
2,4,5-T	BRL	17		µg/Kg	1	4/23/2004 1:21:00 PM
2,4,5-TP (Silvex)	BRL	17		µg/Kg	1	4/23/2004 1:21:00 PM
2,4-D	BRL	17		µg/Kg	1	4/23/2004 1:21:00 PM
2,4-DB	BRL	17		µg/Kg	1	4/23/2004 1:21:00 PM
Dalapon	BRL	33		µg/Kg	1	4/23/2004 1:21:00 PM
Dicamba	BRL	17		µg/Kg	1	4/23/2004 1:21:00 PM
Dichlorprop	BRL	17		µg/Kg	1	4/23/2004 1:21:00 PM
Dinoseb	BRL	17		µg/Kg	1	4/23/2004 1:21:00 PM
MCPA	BRL	660		µg/Kg	1	4/23/2004 1:21:00 PM
MCPP	BRL	660		µg/Kg	1	4/23/2004 1:21:00 PM
Surr: DCAA	105	29.1-134		%REC	1	4/23/2004 1:21:00 PM
METALS, TOTAL		**SW6010B**		**(SW3050B)**		Analyst: **CDW**
Antimony	BRL	3.51		mg/Kg	1	4/23/2004 1:08:00 PM
Arsenic	BRL	3.51		mg/Kg	1	4/23/2004 1:08:00 PM
Beryllium	BRL	1.75		mg/Kg	1	4/23/2004 1:08:00 PM

Qualifiers:			
*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
BRL	Below Reporting Limit	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
N	Analyte not NELAC certified	P	NELAC analyte certification pending
Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: *23-Apr-04*

CLIENT:	Secor International	**Client Sample ID:**	RR2
Lab Order:	0404A30	**Collection Date:**	4/21/2004 4:35:00 PM
Project:	Pike Nursery		
Lab ID:	0404A30-002	**Matrix:**	SEDIMENT

Analyses	Result	Rpt. Limit	Qual	Units	DF	Date Analyzed
METALS, TOTAL		**SW6010B**		**(SW3050B)**		Analyst: **CDW**
Cadmium	BRL	1.75		mg/Kg	1	4/23/2004 1:08:00 PM
Chromium	6.35	1.75		mg/Kg	1	4/23/2004 1:08:00 PM
Copper	3.94	1.75		mg/Kg	1	4/23/2004 1:08:00 PM
Lead	5.48	3.51		mg/Kg	1	4/23/2004 1:08:00 PM
Nickel	BRL	3.51		mg/Kg	1	4/23/2004 1:08:00 PM
Selenium	BRL	3.51		mg/Kg	1	4/23/2004 1:08:00 PM
Silver	BRL	1.75		mg/Kg	1	4/23/2004 1:08:00 PM
Thallium	BRL	3.51		mg/Kg	1	4/23/2004 1:08:00 PM
Zinc	22.1	3.51		mg/Kg	1	4/23/2004 1:08:00 PM
TOTAL MERCURY		**SW7471A**		**(SW7471A)**		Analyst: **BB**
Mercury	BRL	0.0857		mg/Kg	1	4/23/2004 11:17:00 AM

Qualifiers:					
	*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	N	Analyte not NELAC certified	P	NELAC analyte certification pending
	Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: *23-Apr-04*

CLIENT:	Secor International	**Client Sample ID:**	LH-SED
Lab Order:	0404A30	**Collection Date:**	4/22/2004 11:25:00 AM
Project:	Pike Nursery		
Lab ID:	0404A30-003	**Matrix:**	SEDIMENT

Analyses	Result	Rpt. Limit	Qual	Units	DF	Date Analyzed
CHLORINATED PESTICIDES, TARGET COMPOUN		**SW8081A**				Analyst: **JMZ**
4,4´-DDD	BRL	3.3		µg/Kg	1	4/23/2004 1:41:00 PM
4,4´-DDE	BRL	3.3		µg/Kg	1	4/23/2004 1:41:00 PM
4,4´-DDT	BRL	3.3		µg/Kg	1	4/23/2004 1:41:00 PM
Aldrin	BRL	1.7		µg/Kg	1	4/23/2004 1:41:00 PM
alpha-BHC	BRL	1.7		µg/Kg	1	4/23/2004 1:41:00 PM
alpha-Chlordane	2.0	1.7		µg/Kg	1	4/23/2004 1:41:00 PM
beta-BHC	BRL	1.7		µg/Kg	1	4/23/2004 1:41:00 PM
delta-BHC	BRL	1.7		µg/Kg	1	4/23/2004 1:41:00 PM
Dieldrin	BRL	3.3		µg/Kg	1	4/23/2004 1:41:00 PM
Endosulfan I	BRL	1.7		µg/Kg	1	4/23/2004 1:41:00 PM
Endosulfan II	BRL	3.3		µg/Kg	1	4/23/2004 1:41:00 PM
Endosulfan sulfate	BRL	3.3		µg/Kg	1	4/23/2004 1:41:00 PM
Endrin	BRL	3.3		µg/Kg	1	4/23/2004 1:41:00 PM
Endrin aldehyde	BRL	3.3		µg/Kg	1	4/23/2004 1:41:00 PM
Endrin ketone	BRL	3.3		µg/Kg	1	4/23/2004 1:41:00 PM
gamma-BHC	BRL	3.3		µg/Kg	1	4/23/2004 1:41:00 PM
gamma-Chlordane	BRL	1.7		µg/Kg	1	4/23/2004 1:41:00 PM
Heptachlor	BRL	1.7		µg/Kg	1	4/23/2004 1:41:00 PM
Heptachlor epoxide	BRL	1.7		µg/Kg	1	4/23/2004 1:41:00 PM
Methoxychlor	BRL	17		µg/Kg	1	4/23/2004 1:41:00 PM
Toxaphene	BRL	170		µg/Kg	1	4/23/2004 1:41:00 PM
Surr: Decachlorobiphenyl	53.5	11.2-135		%REC	1	4/23/2004 1:41:00 PM
Surr: Tetrachloro-m-xylene	59.5	16.4-135		%REC	1	4/23/2004 1:41:00 PM
CHLORINATED HERBICIDES		**SW8151A**		**(SW3550)**		Analyst: **JMZ**
2,4,5-T	BRL	17		µg/Kg	1	4/23/2004 2:03:00 PM
2,4,5-TP (Silvex)	BRL	17		µg/Kg	1	4/23/2004 2:03:00 PM
2,4-D	BRL	17		µg/Kg	1	4/23/2004 2:03:00 PM
2,4-DB	BRL	17		µg/Kg	1	4/23/2004 2:03:00 PM
Dalapon	BRL	33		µg/Kg	1	4/23/2004 2:03:00 PM
Dicamba	BRL	17		µg/Kg	1	4/23/2004 2:03:00 PM
Dichlorprop	67	17	NC	µg/Kg	1	4/23/2004 2:03:00 PM
Dinoseb	BRL	17		µg/Kg	1	4/23/2004 2:03:00 PM
MCPA	BRL	660		µg/Kg	1	4/23/2004 2:03:00 PM
MCPP	BRL	660		µg/Kg	1	4/23/2004 2:03:00 PM
Surr: DCAA	102	29.1-134		%REC	1	4/23/2004 2:03:00 PM
METALS, TOTAL		**SW6010B**		**(SW3050B)**		Analyst: **CDW**
Antimony	BRL	2.91		mg/Kg	1	4/23/2004 1:12:00 PM
Arsenic	BRL	2.91		mg/Kg	1	4/23/2004 1:12:00 PM
Beryllium	BRL	1.45		mg/Kg	1	4/23/2004 1:12:00 PM

Qualifiers:	*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	N	Analyte not NELAC certified	P	NELAC analyte certification pending
	Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: *23-Apr-04*

CLIENT:	Secor International	**Client Sample ID:**	LH-SED
Lab Order:	0404A30	**Collection Date:**	4/22/2004 11:25:00 AM
Project:	Pike Nursery		
Lab ID:	0404A30-003	**Matrix:**	SEDIMENT

Analyses	Result	Rpt. Limit	Qual	Units	DF	Date Analyzed
METALS, TOTAL		**SW6010B**		**(SW3050B)**		Analyst: **CDW**
Cadmium	BRL	1.45		mg/Kg	1	4/23/2004 1:12:00 PM
Chromium	6.99	1.45		mg/Kg	1	4/23/2004 1:12:00 PM
Copper	3.54	1.45		mg/Kg	1	4/23/2004 1:12:00 PM
Lead	8.36	2.91		mg/Kg	1	4/23/2004 1:12:00 PM
Nickel	BRL	2.91		mg/Kg	1	4/23/2004 1:12:00 PM
Selenium	BRL	2.91		mg/Kg	1	4/23/2004 1:12:00 PM
Silver	BRL	1.45		mg/Kg	1	4/23/2004 1:12:00 PM
Thallium	BRL	2.91		mg/Kg	1	4/23/2004 1:12:00 PM
Zinc	91.0	2.91		mg/Kg	1	4/23/2004 1:12:00 PM
TOTAL MERCURY		**SW7471A**		**(SW7471A)**		Analyst: **BB**
Mercury	BRL	0.0971		mg/Kg	1	4/23/2004 11:17:00 AM

Qualifiers:	*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	N	Analyte not NELAC certified	P	NELAC analyte certification pending
	Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: *23-Apr-04*

CLIENT:	Secor International	**Client Sample ID:**	WELL
Lab Order:	0404A30	**Collection Date:**	4/22/2004 11:30:00 AM
Project:	Pike Nursery		
Lab ID:	0404A30-004	**Matrix:**	GROUNDWATER

Analyses	Result	Rpt. Limit	Qual	Units	DF	Date Analyzed
CHLORINATED PESTICIDES, TARGET COMPOUN		**SW8081A**		**(SW3510B)**		Analyst: **JMZ**
4,4´-DDD	BRL	0.10		µg/L	1	4/23/2004 12:05:00 PM
4,4´-DDE	BRL	0.10		µg/L	1	4/23/2004 12:05:00 PM
4,4´-DDT	BRL	0.10		µg/L	1	4/23/2004 12:05:00 PM
Aldrin	BRL	0.050		µg/L	1	4/23/2004 12:05:00 PM
alpha-BHC	BRL	0.050		µg/L	1	4/23/2004 12:05:00 PM
alpha-Chlordane	BRL	0.050		µg/L	1	4/23/2004 12:05:00 PM
beta-BHC	BRL	0.050		µg/L	1	4/23/2004 12:05:00 PM
delta-BHC	BRL	0.050		µg/L	1	4/23/2004 12:05:00 PM
Dieldrin	BRL	0.10		µg/L	1	4/23/2004 12:05:00 PM
Endosulfan I	BRL	0.050		µg/L	1	4/23/2004 12:05:00 PM
Endosulfan II	BRL	0.10		µg/L	1	4/23/2004 12:05:00 PM
Endosulfan sulfate	BRL	0.10		µg/L	1	4/23/2004 12:05:00 PM
Endrin	BRL	0.10		µg/L	1	4/23/2004 12:05:00 PM
Endrin aldehyde	BRL	0.10		µg/L	1	4/23/2004 12:05:00 PM
Endrin ketone	BRL	0.10		µg/L	1	4/23/2004 12:05:00 PM
gamma-BHC	BRL	0.050		µg/L	1	4/23/2004 12:05:00 PM
gamma-Chlordane	BRL	0.050		µg/L	1	4/23/2004 12:05:00 PM
Heptachlor	BRL	0.050		µg/L	1	4/23/2004 12:05:00 PM
Heptachlor epoxide	BRL	0.050		µg/L	1	4/23/2004 12:05:00 PM
Methoxychlor	BRL	0.50		µg/L	1	4/23/2004 12:05:00 PM
Toxaphene	BRL	5.0		µg/L	1	4/23/2004 12:05:00 PM
Surr: Decachlorobiphenyl	88.9	10-121		%REC	1	4/23/2004 12:05:00 PM
Surr: Tetrachloro-m-xylene	77.0	10.9-125		%REC	1	4/23/2004 12:05:00 PM
CHLORINATED HERBICIDES		**SW8151A**		**(SW3510B)**		Analyst: **JMZ**
2,4,5-T	BRL	0.50		µg/L	1	4/23/2004 11:17:00 AM
2,4,5-TP (Silvex)	BRL	0.50		µg/L	1	4/23/2004 11:17:00 AM
2,4-D	BRL	0.50		µg/L	1	4/23/2004 11:17:00 AM
2,4-DB	BRL	0.50		µg/L	1	4/23/2004 11:17:00 AM
Dalapon	BRL	1.0		µg/L	1	4/23/2004 11:17:00 AM
Dicamba	BRL	0.50		µg/L	1	4/23/2004 11:17:00 AM
Dichlorprop	BRL	0.50		µg/L	1	4/23/2004 11:17:00 AM
Dinoseb	BRL	0.50		µg/L	1	4/23/2004 11:17:00 AM
MCPA	BRL	50		µg/L	1	4/23/2004 11:17:00 AM
MCPP	BRL	50		µg/L	1	4/23/2004 11:17:00 AM
Surr: DCAA	105	22.8-136		%REC	1	4/23/2004 11:17:00 AM
METALS, TOTAL		**SW6010B**		**(SW3010A)**		Analyst: **CDW**
Antimony	BRL	0.0200		mg/L	1	4/23/2004 12:16:00 PM
Arsenic	BRL	0.0500		mg/L	1	4/23/2004 12:16:00 PM
Beryllium	BRL	0.0100		mg/L	1	4/23/2004 12:16:00 PM

Qualifiers:	*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	N	Analyte not NELAC certified	P	NELAC analyte certification pending
	Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: *23-Apr-04*

CLIENT:	Secor International	**Client Sample ID:**	WELL
Lab Order:	0404A30	**Collection Date:**	4/22/2004 11:30:00 AM
Project:	Pike Nursery		
Lab ID:	0404A30-004	**Matrix:**	GROUNDWATER

Analyses	Result	Rpt. Limit	Qual	Units	DF	Date Analyzed
METALS, TOTAL		**SW6010B**		**(SW3010A)**		Analyst: **CDW**
Cadmium	BRL	0.0050		mg/L	1	4/23/2004 12:16:00 PM
Chromium	BRL	0.0100		mg/L	1	4/23/2004 12:16:00 PM
Copper	0.0152	0.0100		mg/L	1	4/23/2004 12:16:00 PM
Lead	BRL	0.0100		mg/L	1	4/23/2004 12:16:00 PM
Nickel	BRL	0.0200		mg/L	1	4/23/2004 12:16:00 PM
Selenium	BRL	0.0200		mg/L	1	4/23/2004 12:16:00 PM
Silver	BRL	0.0100		mg/L	1	4/23/2004 12:16:00 PM
Thallium	BRL	0.0200		mg/L	1	4/23/2004 12:16:00 PM
Zinc	0.0223	0.0200		mg/L	1	4/23/2004 12:16:00 PM
MERCURY, TOTAL		**SW7470A**		**(SW7470A)**		Analyst: **BB**
Mercury	BRL	0.00020		mg/L	1	4/23/2004 12:43:00 PM

Qualifiers:				
	*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	N	Analyte not NELAC certified	P	NELAC analyte certification pending
	Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: *23-Apr-04*

CLIENT:	Secor International	**Client Sample ID:**	DRAIN FIELD
Lab Order:	0404A30	**Collection Date:**	4/22/2004 12:01:00 PM
Project:	Pike Nursery		
Lab ID:	0404A30-005	**Matrix:**	SOIL

Analyses	Result	Rpt. Limit	Qual	Units	DF	Date Analyzed
CHLORINATED PESTICIDES, TARGET COMPOUN		**SW8081A**				Analyst: **JMZ**
4,4´-DDD	BRL	3.3		µg/Kg	1	4/23/2004 12:11:00 PM
4,4´-DDE	BRL	3.3		µg/Kg	1	4/23/2004 12:11:00 PM
4,4´-DDT	BRL	3.3		µg/Kg	1	4/23/2004 12:11:00 PM
Aldrin	BRL	1.7		µg/Kg	1	4/23/2004 12:11:00 PM
alpha-BHC	BRL	1.7		µg/Kg	1	4/23/2004 12:11:00 PM
alpha-Chlordane	BRL	1.7		µg/Kg	1	4/23/2004 12:11:00 PM
beta-BHC	BRL	1.7		µg/Kg	1	4/23/2004 12:11:00 PM
delta-BHC	BRL	1.7		µg/Kg	1	4/23/2004 12:11:00 PM
Dieldrin	BRL	3.3		µg/Kg	1	4/23/2004 12:11:00 PM
Endosulfan I	BRL	1.7		µg/Kg	1	4/23/2004 12:11:00 PM
Endosulfan II	BRL	3.3		µg/Kg	1	4/23/2004 12:11:00 PM
Endosulfan sulfate	BRL	3.3		µg/Kg	1	4/23/2004 12:11:00 PM
Endrin	BRL	3.3		µg/Kg	1	4/23/2004 12:11:00 PM
Endrin aldehyde	BRL	3.3		µg/Kg	1	4/23/2004 12:11:00 PM
Endrin ketone	BRL	3.3		µg/Kg	1	4/23/2004 12:11:00 PM
gamma-BHC	BRL	3.3		µg/Kg	1	4/23/2004 12:11:00 PM
gamma-Chlordane	BRL	1.7		µg/Kg	1	4/23/2004 12:11:00 PM
Heptachlor	BRL	1.7		µg/Kg	1	4/23/2004 12:11:00 PM
Heptachlor epoxide	BRL	1.7		µg/Kg	1	4/23/2004 12:11:00 PM
Methoxychlor	BRL	17		µg/Kg	1	4/23/2004 12:11:00 PM
Toxaphene	BRL	170		µg/Kg	1	4/23/2004 12:11:00 PM
Surr: Decachlorobiphenyl	85.4	11.2-135		%REC	1	4/23/2004 12:11:00 PM
Surr: Tetrachloro-m-xylene	54.7	16.4-135		%REC	1	4/23/2004 12:11:00 PM
CHLORINATED HERBICIDES		**SW8151A**		**(SW3550)**		Analyst: **JMZ**
2,4,5-T	BRL	17		µg/Kg	1	4/23/2004 1:42:00 PM
2,4,5-TP (Silvex)	BRL	17		µg/Kg	1	4/23/2004 1:42:00 PM
2,4-D	BRL	17		µg/Kg	1	4/23/2004 1:42:00 PM
2,4-DB	BRL	17		µg/Kg	1	4/23/2004 1:42:00 PM
Dalapon	BRL	33		µg/Kg	1	4/23/2004 1:42:00 PM
Dicamba	BRL	17		µg/Kg	1	4/23/2004 1:42:00 PM
Dichlorprop	BRL	17		µg/Kg	1	4/23/2004 1:42:00 PM
Dinoseb	BRL	17		µg/Kg	1	4/23/2004 1:42:00 PM
MCPA	BRL	660		µg/Kg	1	4/23/2004 1:42:00 PM
MCPP	BRL	660		µg/Kg	1	4/23/2004 1:42:00 PM
Surr: DCAA	82.2	29.1-134		%REC	1	4/23/2004 1:42:00 PM
METALS, TOTAL		**SW6010B**		**(SW3050B)**		Analyst: **CDW**
Antimony	BRL	3.07		mg/Kg	1	4/23/2004 1:37:00 PM
Arsenic	BRL	3.07		mg/Kg	1	4/23/2004 1:37:00 PM
Beryllium	BRL	1.54		mg/Kg	1	4/23/2004 1:37:00 PM

Qualifiers:					
	*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	N	Analyte not NELAC certified	P	NELAC analyte certification pending
	Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

Analytical Environmental Services, Inc.

Date: *23-Apr-04*

CLIENT:	Secor International	**Client Sample ID:**	DRAIN FIELD
Lab Order:	0404A30	**Collection Date:**	4/22/2004 12:01:00 PM
Project:	Pike Nursery		
Lab ID:	0404A30-005	**Matrix:**	SOIL

Analyses	Result	Rpt. Limit	Qual	Units	DF	Date Analyzed
METALS, TOTAL		**SW6010B**		**(SW3050B)**		Analyst: **CDW**
Cadmium	BRL	1.54		mg/Kg	1	4/23/2004 1:37:00 PM
Chromium	15.7	1.54		mg/Kg	1	4/23/2004 1:37:00 PM
Copper	11.5	1.54		mg/Kg	1	4/23/2004 1:37:00 PM
Lead	15.7	3.07		mg/Kg	1	4/23/2004 1:37:00 PM
Nickel	BRL	3.07		mg/Kg	1	4/23/2004 1:37:00 PM
Selenium	BRL	3.07		mg/Kg	1	4/23/2004 1:37:00 PM
Silver	BRL	1.54		mg/Kg	1	4/23/2004 1:37:00 PM
Thallium	BRL	3.07		mg/Kg	1	4/23/2004 1:37:00 PM
Zinc	11.7	3.07		mg/Kg	1	4/23/2004 1:37:00 PM
TOTAL MERCURY		**SW7471A**		**(SW7471A)**		Analyst: **BB**
Mercury	BRL	0.0980		mg/Kg	1	4/23/2004 11:17:00 AM

Qualifiers:	*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
	BRL	Below Reporting Limit	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	N	Analyte not NELAC certified	P	NELAC analyte certification pending
	Rpt Limit	Reporting Limit	S	Spike Recovery outside accepted recovery limits

FINAL
NON-DESTRUCTIVE ASBESTOS SURVEY
AND
LEAD-BASED PAINT ASSESSMENT
FOR

PIKE NURSERY
6100 LAWRENCEVILLE HIGHWAY
TUCKER, GEORGIA

SECOR Job No.: 21OT.04009.00.0009

Prepared for:
Roark Capital Group
The Proscenium
1170 Peachtree Street, 18th Floor
Atlanta, Georgia 30309

Submitted by:
SECOR International Incorporated
20 Mansell Court East, Suite 275
Roswell, Georgia 30076

May 12, 2004

Prepared By:

_____

Nathaniel P. Hardee, Jr., CEI
Environmental Specialist

Reviewed By:

_____

Michael D. McKibben
Principal Manager, SE

EXECUTIVE SUMMARY

On April 12, 2004, SECOR International Incorporated (SECOR) conducted a non-destructive asbestos building survey and lead-based paint (LBP) assessment at the Pike Nurseries located at 6100 Lawrenceville Highway in Tucker, Georgia. The property is occupied by a 5,708 square-foot main retail building; a 6,500 square-foot interior wholesale building and a 1,800 square-foot building containing the exterior wholesale sales building.

Results of the SECOR site inspection identified one assumed building material to be asbestos containing (roofing felts/flashings/mastics on main sales building). The remaining building materials throughout the property were inspected, sampled and analyzed by an independent laboratory for the presence of asbestos. A total of eighteen bulk samples for laboratory confirmation were collected and consisting of:

- gypsum wallboard/joint compound
- vinyl floor tiles/mastic adhesives
- stipple ceiling applications
- vinyl floor elevation strips
- 2-foot by 4-foot ceiling tiles

Samples of these materials were tested and the tan vinyl floor tiles and mastic adhesives in the main building were found to contain asbestos (3 percent Chrysotile – tile; 10 percent Chrysotile – mastic). The identified and assumed asbestos containing building materials are in good condition and can be placed under an Operations and Maintenance (O&M) program. During the inspection, SECOR found no areas that could be interpreted as inaccessible, and this survey is deemed to be complete. SECOR's inspection was non-destructive in nature, that is, no demolition of building components was performed in order to access hidden materials such as internal wall insulation or pipe chases, built-up roofing layers, etc.

For the LBP assessment, SECOR sampled five painted building component surfaces:

- exterior protective yellow bollards (Interior warehouse sales)
- interior painted floors in Interior warehouse sales and main building
- exterior doors in Interior warehouse sales
- interior walls in Interior warehouse sales

No bulk surface samples revealed lead concentrations in excess of the US Department of Health and Urban Development (HUD) established threshold of 0.5 percent lead by weight.

Within the State of Georgia, Federal Occupational Safety and Health Administration (OSHA) regulations and State of Georgia Lead-Based Paint (LBP) rules apply to asbestos and lead paint mitigation activities within commercial buildings.

1.0 INTRODUCTION

1.1 Purpose

SECOR International Incorporated (SECOR) performed an asbestos building survey and lead-based paint (LBP) assessment at the Pike Nurseries building located at 6100 Lawrenceville Highway in Tucker, Georgia. The purpose of the asbestos survey and sampling program was to identify and determine, as practical, the quantity and condition of suspect asbestos-containing materials (ACMs) within the building and exterior building components. The purpose of the LBP assessment and sampling was to identify and determine, as practical, the lead content and condition of those painted interior and exterior facility building components. This report presents the findings of the asbestos survey and LBP assessment and discusses the recommended management options for abatement, if necessary.

1.1.1 Background

ACM

Asbestos is a common term for a group of naturally occurring mineral fibers. Due to its durability and insulating quality, it was used in a wide variety of building products including structural fireproofing, pipe and duct insulation, plasters, roofing materials, floor tile, and linoleum. Adverse health effects have been associated with the inhalation of airborne asbestos fibers by asbestos industry workers. The asbestos fibers that are tightly bound in building materials do not represent an exposure hazard unless disturbed in such a way that releases airborne fibers (i.e. cutting, drilling or sanding). By June of 1978, the U.S. Environmental Protection Agency (EPA) had effectively banned the use of asbestos in spray application products such as structural fireproofing and acoustic ceilings, pipe-lagging, joint compounds, and spackles. Asbestos is still used in the manufacture of non-friable products such as vinyl floor tile and roofing materials.

LBP

According to information compiled by the EPA, sustained use of large quantities of lead over many years has resulted in extensive environmental contamination. Although lead occurs naturally in small quantities in the earth's crust, by far the greatest risk of exposure to lead derives from man-made processes and products. The principal industrial use of lead is in the manufacturing of electrical storage batteries. Other current uses have included the production of ammunition, various chemicals, and sinkers for fishing. The use of lead in paint additives, gasoline additives, solder, and pipes has been reduced substantially or eliminated, but the old installed products or residuals from their use remain in the environment.

Although discussions concerning lead poisoning are often focused on children, adults are also affected by lead. Adults who work in certain industries such as smelting, auto body

repair and painting shops, and construction (including lead abatement), can be at risk. Moreover, they may carry lead contaminated dust into their homes on work clothes, shoes, and hair, if care and precautions are not taken. According to the EPA, the major source of lead for most adults is occupational exposure.

1.2 Involved Parties

SECOR was retained by the Roark Capital Group to conduct an asbestos building survey including sampling and LBP assessment including sampling at the commercial facility.

Mr. Nathaniel P. Hardee, Jr., SECOR Environmental Specialist, performed the visual inspection, bulk sampling, and survey documentation. Mr. Hardee is accredited by the EPA as an Asbestos Inspector/Management Planner, Certification No. 8316. Mr. Hardee is also a US HUD licensed Lead-Based Paint Inspector and Risk Assessor No. 8005. Principal Technical review was conducted by Mr. Michael McKibben, Principal Manager.

2.0 SCOPE OF WORK

The scope of work included the following:

- Perform a visual inspection and non-destructive sampling to identify sources of ACM, friable and non-friable, at the facility
- Perform a LBP assessment and sampling to identify sources of LBP at the facility
- Collect and analyze bulk samples of suspect materials for asbestos content and species identification
- Collect and analyze bulk samples of paint for lead content
- Ensure the technical quality of all work by using US EPA Asbestos Hazard Emergency Response Act (AHERA) accredited Inspectors and Management Planners, and United States Housing and Urban Development (US HUD) licensed Lead-Based Paint Inspector/Risk Assessors
- Consolidate the data and findings into a report format
- Prepare recommendations concerning management options for asbestos and lead

3.0 BUILDING DESCRIPTION

The property is occupied by an approximate 5,708 square-foot main retail building, a 6,500 square-foot interior wholesale building, and a 1,800 square-foot building containing the exterior wholesale sales building. Improvements throughout the sales buildings consist of a combination of interior gypsum wallboard and masonry walls, ceramic baseboards, a combination of vinyl and ceramic tile over concrete, stipple ceiling applications and suspended 1-foot by 1-foot and 2-foot by 4-foot acoustical ceiling tiles throughout some of the office/customer spaces. Paper-backed fiberglass insulation exists throughout the attic sections. Exterior components consist of roofing felts/flashings and mastics.

During the SECOR asbestos survey, the supply lines throughout all of the buildings were physically surveyed to verify the composition of the pipe runs and elbows/tee sections. The roof skeleton in each of the sales buildings is comprised of large wood trusses.

4.0 CURRENT REGULATIONS

The following is a summary of current State and Federal regulations that contain requirements related to the performance of building surveys for asbestos and LBP. These summaries are not intended to be all-inclusive and do not contain every aspect of the regulations discussed. Regulations pertaining to the removal and disposal of ACMs and LBP are not included.

4.1 Asbestos Hazard Emergency Response Act (AHERA), 40 CFR Part 763, Subpart E

ACM

Asbestos Hazard Emergency Response Act (AHERA) requires performance of asbestos surveys and the development of Asbestos Management Plans for all of the nation's primary and secondary schools. The procedures mandated under AHERA are considered the industry standard and are applied to all surveys performed by SECOR.

LBP

LBP is not regulated under AHERA.

4.2 U.S. EPA National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61

ACM

Under the National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation, no visible emissions are allowed during building demolition or renovation activities that involve regulated ACMs (RACMs). For this reason, public and commercial buildings must be surveyed for ACMs prior to demolition or renovation.

If a building demolition is planned, the Georgia Environmental Protection Division (EPD) must be notified by the demolition contractor or building owner prior to building demolition even if no RACMs are present after building inspection. RACM is defined as any material with an asbestos content of greater than 1 percent which is friable or; Category I non-friable ACM that has or will become friable or; Category II non-friable ACM that may become friable by the forces expected to act on the material in the course of demolition or renovation. Categories I and II ACMs are described below.

LBP

LBP is not regulated under NESHAPs.

4.2.1 Regulated Asbestos-Containing Building Materials

In accordance with the EPA's National Emission Standard of Hazardous Air Pollutants (NESHAPs) regulation and the Georgia Department of Natural Resources, Environmental Protection Division, Air Pollution Branch, regulations require the accreditation and/or certification of asbestos abatement personnel do exist. All facilities planned for renovation or demolition must be surveyed for regulated asbestos containing materials (RACMs) prior to the planned renovation or demolition. Removal of identified RACMs is also required prior to the planned renovation or demolition. Removal involves, to the greatest extent practical, the complete removal, disposal, and replacement, if necessary, of the RACMs. Removal usually also requires encapsulation of the remaining structure to lock down residual fibers which may exist to prevent the fibers from becoming airborne.

According to NESHAP, ACM is a material containing more than 1 percent asbestos as determined using the methods specified in Appendix A, Subpart E, 40 CFR Part 763, Section 1, Polarized Light Microscopy (PLM). The NESHAP regulation classifies ACM as friable or non-friable. Friable ACM is ACM that contains more than 1 percent asbestos and when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. In order for a material to be classified as an RACM, it must meet both criteria of containing greater than 1 percent asbestos and be friable.

Non-friable ACM also contains more than 1 percent asbestos and is further classified as either Category I ACM or Category II ACM. The materials are distinguished by their potential to release fibers when damaged.

Category I ACM includes asbestos-containing gaskets, packings, resilient floor coverings and mastics, and asphalt roofing products. Asphalt roofing products are those materials that contain asbestos and include: built-up roofing, asphalt-containing single ply membrane systems, asphalt shingles, asphalt-containing underlayment felts, asphalt-containing roof coatings, mastics, and asphalt-containing base flashings.

Category II ACM includes all other non-friable ACM; for example, asbestos cement shingles, asbestos cement tiles, and transite boards or panels.

As stated above, the EPA requires removal of all RACMs prior to demolition or renovation. RACMs include friable ACMs, Category I ACMs which have or will become friable, or that has been subjected to sanding, drilling, grinding, cutting or abrading, and Category II ACMs that may become or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation. However, if the Category I non-friable ACMs are not subjected to sanding, drilling, grinding, cutting, or abrading, they may be left in place during the demolition activities and disposed (properly labeled) of in any landfill that will accept this type of non-hazardous waste.

If a material is deemed an RACM, certain work practices and procedures are required. That is, the material must be abated by a licensed asbestos abatement contractor prior to any renovation or demolition activities. The owner or operator is required to provide written notification to EPD. These are only two examples of requirements under the law. Due to the regulatory agencies (i.e. EPA, state air quality management districts, Federal Occupational Safety and Health Administration (OSHA)) and their governing laws for owners/operators, contractors, asbestos abatement workers, worker safety requirements, and transportation and disposal requirements, SECOR is not able to provide an all inclusive list of requirements for asbestos work operations.

4.3 Federal Occupational Safety and Health Administration

ACM

OSHA, under 29 CFR 1926.1101 Occupational Exposure to Asbestos (Construction Standard), Section K - Communication of Hazards, requires building and facility owners to communicate information concerning asbestos hazards in construction activities in order to facilitate compliance with the standard. Asbestos-containing construction materials are defined as any material with an asbestos content of greater than 1 percent (>1%). The regulation also implies a due diligence of building or facility owners who have knowledge or have contracted for services concerning asbestos activities to notify all individuals who may come in contact with ACM or presumed ACM (PACM).

The responsibilities of building and facility owners include notifying specific persons of the presence, location and quantity of ACM or PACM, at the work sites in their buildings and facilities. Notification shall be in writing, shall consist of a personnel communication between owner and the person to whom notification is given or their authorized representatives. The list of people requiring notification includes, but is not limited to, prospective employees applying or bidding for work, employees of the owner, all employers or employees who will be performing work, and tenants. Additional notification requirements exist for employers or employees who perform work on or adjacent to the areas containing asbestos.

LBP

The Lead Exposure in Construction, Interim Final Rule (29 CFR Part 1926.62) presents Federal OSHA's requirements for activities related to the disturbance of lead-based paint.

4.4 United States Department of Health and Urban Development (HUD)

ACM

Asbestos activities are regulated by US EPA and State of Georgia regulations. HUD does not regulate asbestos activities.

LBP

Lead-based paint is recognized as a potential health risk due to the known toxic effects of lead exposure, primarily through ingestion, on the central nervous system, kidneys, and blood stream. Concern for lead-based paint is primarily related to residential structures, which in addition, may apply to commercial structures. The risk of lead toxicity in lead-based paint varies based upon the condition of the paint and the year of its application. HUD has identified the following risk factors:

- The age of the structure as follows:
  - The maximum risk is from paint applied before 1950.
  - There is severe risk from paint applied before 1960.
  - There is moderate risk from deteriorated paint applied before 1970.
  - There is a slight risk from paint that is intact but applied before 1977.
  - Paint applied in 1977 or later is not expected to contain lead.
- The condition of the painted surfaces
- The presence of children and certain types of household goods in the building
- Previously reported cases of lead poisoning in the building or area

HUD has defined lead-based paint as any paint that contains more than 0.5 percent lead by weight. The EPD governs the inspection, removal, and disposal of identified lead-based paint components.

4.5 Environmental Protection Agency

ACM

The EPA has approved a test method entitled “Method for the Determination of Asbestos in Bulk Building Materials” (EPA/600/R-93/116). The test method was developed to improve identification of ACMs under the AHERA regulation, and the asbestos NESHAP.

The improved method provides more precise analytical results (especially at low asbestos concentrations), enhanced analysis of floor tiles which may contain thin fibers below the limits of resolution of the PLM, and clearer instruction on the analysis of bulk materials, particularly where multiple layers are present.

At this time, there is no modification of the AHERA requirements and results obtained by following the 1982 protocol (PLM) and the AHERA sampling rules meet the AHERA legal requirements. It may be prudent for building owners to further analyze floor tile samples and multi-layered materials using the EPA Test Method (Transmission Electron Microscopy - TEM) if these materials were not found to be asbestos-containing using PLM. The EPA Test Method (TEM) may also be applied to other multi-layered materials such hard wall, acoustical plaster, and stucco.

LBP

The paint chip samples were analyzed by EPA Method SW-846 7420. This method of analysis represents weight percent (wt percentage) of lead (total lead) in each sample. Federal OSHA regulations which apply to construction personnel (29 CFR 1926.62), requires that employers assess worker airborne exposures to lead either through personal air monitoring, objective data or previous data for similar work.

5.0 INVESTIGATIVE METHODS

5.1 Visual Inspection

ACM

Accessible building materials were visually inspected using the methods presented in the Federal AHERA regulations (40 CFR, Part 763) as a guideline. Potential ACMs were also physically assessed for friability, condition, and disturbance factors. The principles presented under the AHERA Final Rule are generally accepted as the industry standard for ACBM inspections.

SECOR's inspection was non-destructive in nature. That is, no demolition of building components was performed in order to access hidden materials such as internal wall insulation or pipe chases, flooring materials under carpeting, etc. SECOR did collect bulk samples of roofing components during the asbestos survey.

LBP

A visual inspection of interior/exterior painted building surfaces throughout the facility was conducted. Interior walls were observed to be painted with multiple layers of paint, and were observed to be in good condition. Several exterior painted surfaces were judged to be in fair condition, with several areas (i.e. exterior protective bollards) were noted to be in fair condition. All interior painted surfaces were observed to be generally in good condition.

SECOR observed the paint areas of every wall system throughout the facility; it is accepted inspection protocol to collect samples based on the facilities' paint history, color, location relative to accessibility, and texture.

5.2 Bulk Sampling

ACM

Bulk samples of all homogeneous materials from identified functional spaces containing suspect ACMs were collected. A homogeneous material is defined as a surfacing material, thermal system insulation, or miscellaneous material that is uniform in use, color and texture. Examples of homogeneous materials include:

- Pipe-laggings produced by the same manufacturer and installed during the same period
- Vinyl floor tile of identical size, color and pattern
- Suspended acoustical ceiling materials located in contiguous areas

A total of eighteen (18) samples of suspected asbestos-containing materials were collected during the site inspection.

A functional space is defined as any spatially distinct unit within a building that contains identifiable populations of building occupants. Examples of functional spaces include:

- office areas
- storage areas
- mechanical rooms

The functional space concept is helpful in determining the use and occupancy of building areas containing confirmed ACMs. Knowing the types of occupants and their use of an area may influence the selection of an asbestos management option and/or corrective action. If multiple corrective actions are necessary, the occupancy and use of individual areas may also become important factors when establishing the priority, or ranking, of each corrective action.

Prior to obtaining the sample, an area of approximately one square foot was sprayed with amended (surfactant-added) water to minimize fiber release and to soften the suspect material. The material was then extracted from the center of the wetted area with either a sharp knife, or a steel 1-inch wide chisel. The chisel was extended far enough into the material to obtain a representative sample of sufficient quantity. A plastic container was used to contain the suspect material and quickly sealed to prevent the escape of the material or the introduction of ACM contamination from outside sources. The sampling apparatus was cleaned after each use to prevent cross-contamination to other samples collected during the asbestos survey. A unique sample number (e.g. BS-1-A) was assigned to each sample. The sample identification number can be interpreted as follows:

BS – Asbestos sample
1 – Number set during sampling activities
A – Letter subset identifying relative location of sample

LBP

Bulk samples of representative painted building components were collected. Five samples of suspected LBP were collected during the SECOR site inspection. Bulk samples were collected by color, location, texture, and paint history.

Prior to obtaining the sample, an area of approximately one square inch was scribed with a sharp knife. The painted surface was then extracted from this area with either a sharp blade, or a steel 1-inch wide chisel. A plastic container was used to contain the suspect material and quickly sealed to prevent the escape of the material or the introduction of LBP cross-contamination from paint residue that could settle on the sampling tools, the exterior of the sampling container, or hands of the collector.

The sampling apparatus was cleaned after each use to prevent cross-contamination to other samples collected during the LBP assessment. Personnel collecting the samples utilized gloves during each sampling event, and changed gloves after the collection of each sample. A unique

sample number (e.g. LP-1) was assigned to each sample. The sample identification number can be interpreted as follows:

LP – Lead Based Paint sample
1 – Number denoting location of sample

5.3 Bulk Sample Analysis

Analytical Environmental Services, Inc. (AES) located in Atlanta, Georgia analyzed the asbestos and LBP bulk samples. AES is accredited under the National Institute of Standards and Technology's National Voluntary Laboratory Accreditation Program (NVLAP) for the analysis of asbestos and LBP in bulk building material samples.

ACM
The ACM samples were analyzed by AHERA protocol using PLM techniques in accordance with methodology approved by the EPA. The lower limit of reliable quantification for asbestos using the PLM method is approximately one percent by volume.

When “No Asbestos Detected” (N/D) appears in this report, it should be interpreted as meaning no asbestos was observed in the sample material above the reliable limit of detection for the PLM method. When “trace” appears in this report, it should be interpreted as meaning asbestos was observed in the sample material below the reliable limit of quantification for the PLM method (<1 percent).

LBP
The LBP samples were analyzed by EPA Method SW-846 7420. The established HUD threshold with regards to lead in paint is 0.5 percent lead by weight.

6.0 RESULTS OF INVESTIGATION

AES analytical laboratory reports and chain-of-custody records are included in Appendix A. SECOR collected paint chips of representative painted surfaces (i.e. gypsum drywall surfaces, wood, metal and masonry surfaces, etc.). The laboratory analytical data and chain-of-custody records are included as Appendix B. Personnel certifications to conduct these activities are provided in Appendix C.

6.1 Asbestos-Containing Building Materials (ACMs)

Following is a summary of the bulk sample results:

Friable[1] Materials

- None identified.

Non-Friable Materials

- Interior tan floor tiles and mastic adhesives in main sales building (3 and 10 percent Chrysotile, tile and mastic, respectively)

Assumed Materials

- Roofing felts, flashings and mastics on main sales building

6.2 Non-Asbestos Containing Building Materials

The following suspected building materials sampled during the survey did not contain asbestos:

- 2-foot by 4-foot white ceiling tiles throughout the main sales building
- Gypsum wallboard/joint compound throughout the main sales building
- 1-foot by 1-foot tan floor tiles located in Interior warehouse sales building
- Gypsum wallboard/joint compound throughout the Interior warehouse sales building
- Stipple ceiling application in restrooms in Interior warehouse sales building
- 1-foot by 1-foot peach floor tiles located in women's restroom (Interior warehouse sales) building
- 1-foot by 1-foot gray floor tiles located in men's restroom (Interior warehouse sales) building
- Elevation vinyl floor strip located in threshold of restrooms in Interior warehouse sales building

[1] *Friable is defined as material that can be crumbled, pulverized, or reduced to powder by hand pressure.*

6.3 Lead-Based Paint Assessment and Sampling

The following information presents the results of the paint chip samples submitted for analyses. No painted exterior components were found to exceed the EPA threshold of 0.5 percent by weight. The building around the identified painted surfaces is scheduled for demolition, and it is required by United States Occupational Safety and Health Administration (US OSHA) and the Code of Federal Regulations (29 CFR 1926.62) that workers be protected from lead dust that might be generated during demolition activities.

7.0 CONCLUSIONS

7.1 Asbestos

The ACM building survey and sampling conducted at the commercial facility located at 6100 Lawrenceville Highway in Tucker, Georgia, assumed one building material (exterior roofing felts, flashings, mastics), and identified one building component (vinyl floor tile and mastics containing 3% and 10% Chrysotile in tile and mastic, respectively). The identified and assumed building materials are in good condition, and can be placed under an Operations and Maintenance (O&M) Program. The building is not scheduled for demolition or renovation, and the asbestos containing material can remain in place until such time the material is disturbed via demolition or remodeling activities, and will be required to be removed and disposed by a State of Georgia licensed asbestos abatement contractor.

7.2 Lead

The LBP assessment found that of the five paint chip samples collected, none of the painted surfaces identified on the exterior of the building at the facility contained lead in excess of the HUD definition of lead-based paint (0.5 percent lead by weight).

APPENDIX A
ASBESTOS LABORATORY REPORT

Non-Destructive Asbestos Survey
Lead-Based Paint Assessment
Pike Nurseries
6100 Lawrenceville Highway
Tucker, Georgia
SECOR Project No.: 21OT.04009.00.0009
May 12, 2004

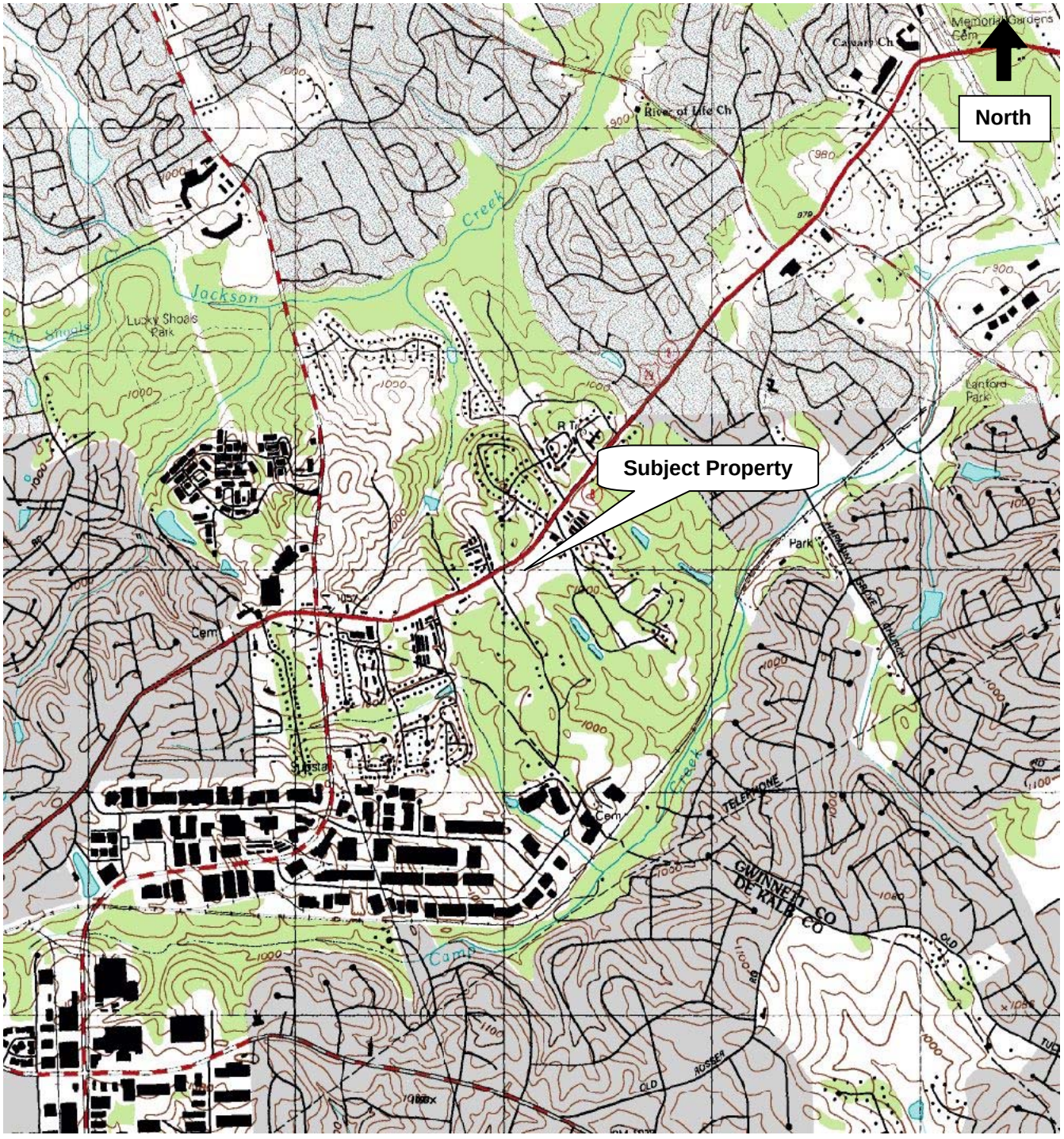
APPENDIX B
LEAD LABORATORY REPORT

Non-Destructive Asbestos Survey
Lead-Based Paint Assessment
Pike Nurseries
6100 Lawrenceville Highway
Tucker, Georgia
SECOR Project No.: 21OT.04009.00.0009
May 12, 2004

APPENDIX C
SECOR PROJECT PERSONNEL CERTIFICATION

Non-Destructive Asbestos Survey
Lead-Based Paint Assessment
Pike Nurseries
6100 Lawrenceville Highway
Tucker, Georgia
SECOR Project No.: 21OT.04009.00.0009
May 12, 2004

ATTACHMENT 2
FIGURES



Georgia

Quadrangle Location Map

Job #: B3OT.9070600.0001

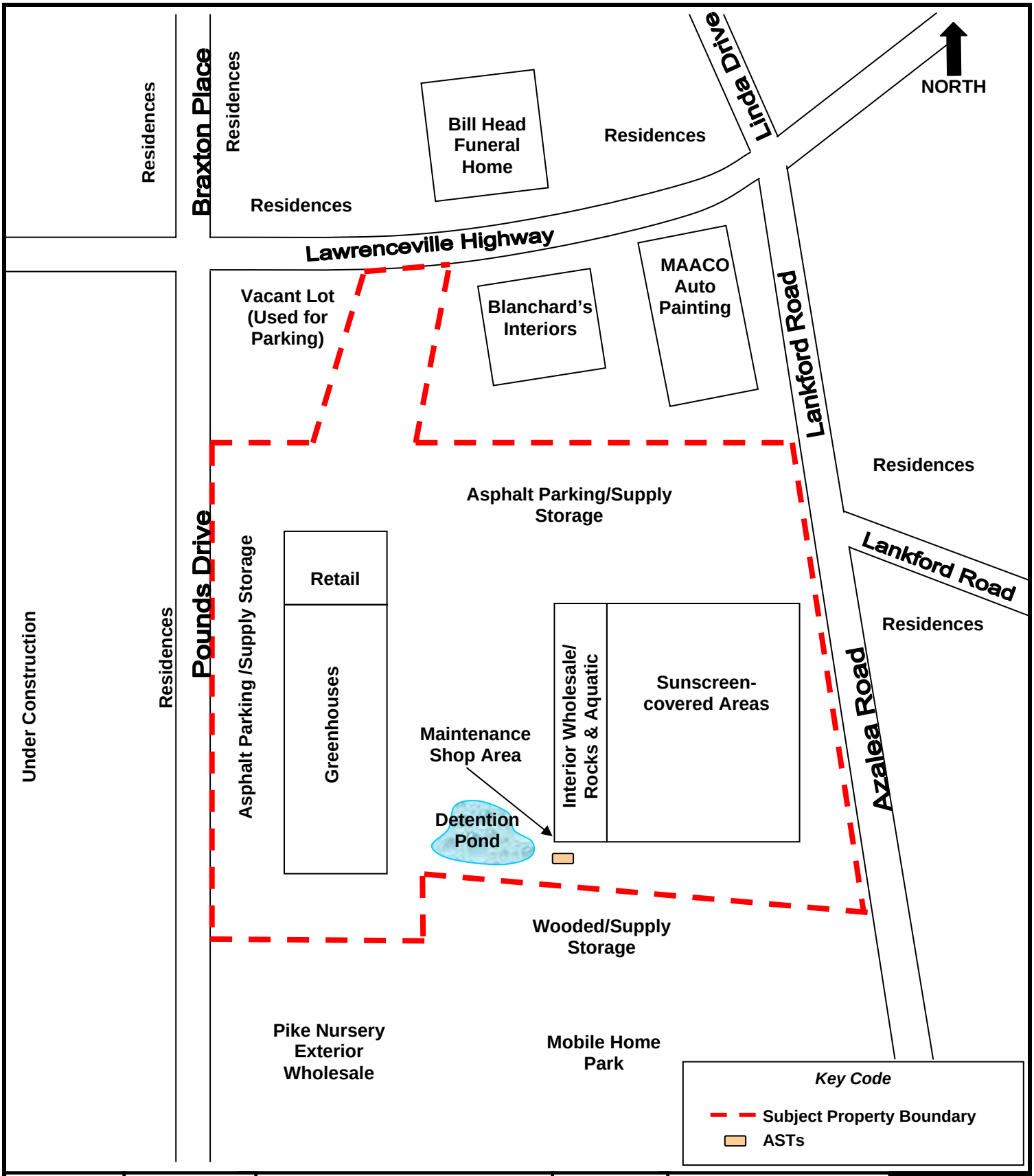
Site Location Map

Pike Nursery
6100 Lawrenceville Highway
Tucker, GA

SECOR

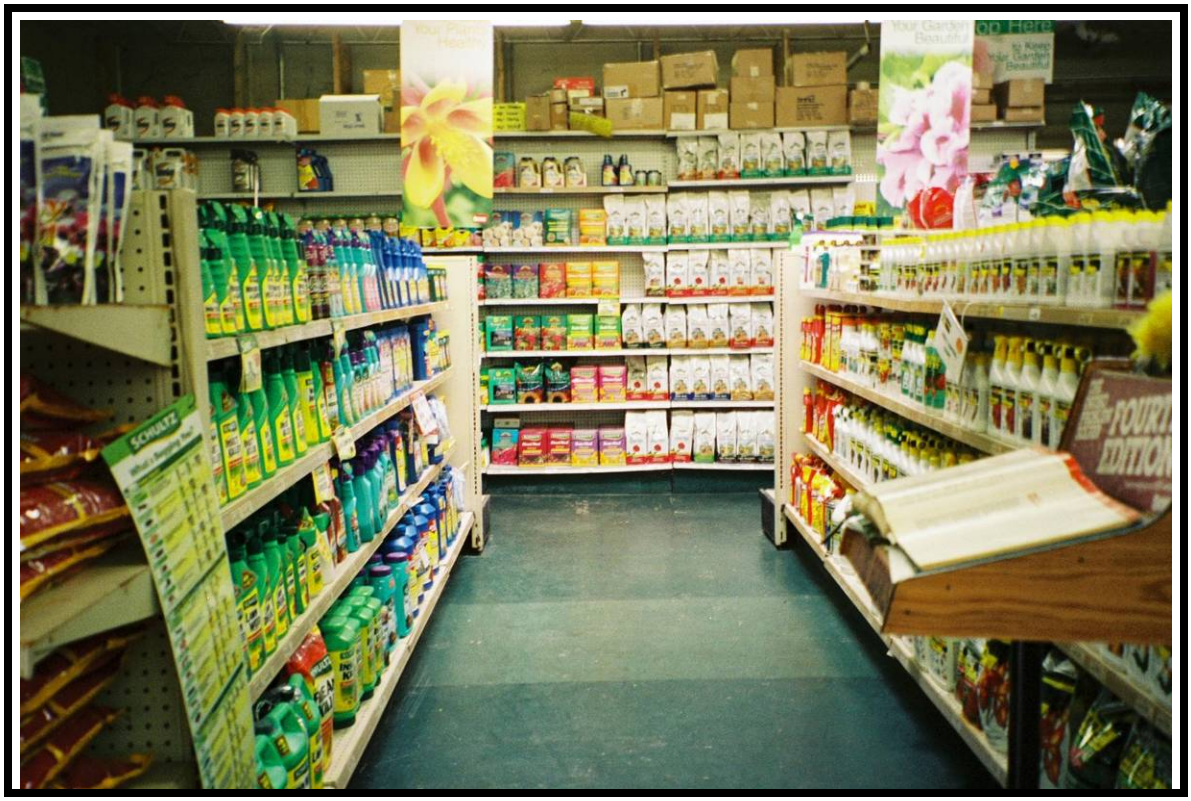
Chesterfield Business Center
7405 Whitepine Road
Richmond, VA 23237

DATE: 10/13/05	***Source: USGS Stone Mountain, GA Quad 1999***	***Scale 1:25000***	***Figure: 1***
DWN: Linda Urban	***APPR: Amy Stanton***		***Revision: 0***



Drawn By: LU	Checked By: AS	PROJECT NO B3OT.90706.00.0001	FIGURE 2	Chesterfield Business Park 7405 Whitepine Rd Richmond, VA 23237	SECOR
Dwg Date 10/13/05	Revision 0	Pike Nursery 6100 Lawrenceville Hwy Tucker, GA	Title: Site Plan		
Client: Pike Nursery			Scale: None		

ATTACHMENT 3
SITE PHOTOGRAPHS



1. Interior storage area of fungicides, pesticides, and herbicides for retail purposes.

2. View of the parking area between the subject property buildings.

3. View of the ASTs to the southwest corner of the interior wholesale / rocks and aquatic building.

4. View of the pad-mounted transformer and the backup generator adjacent to the maintenance shop area.

5. View of the detention area in the central portion of the subject property.

6. View of the concrete flumes for drainage located to the south of the sunscreen-covered areas.

ATTACHMENT 4
ENVIRONMENTAL AGENCY DATABASE REPORT

EDR FieldCheck® Report

Pike Nursery
6100 Lawrenceville Hwy
Tucker, GA 30084

Inquiry Number: 1520524.1s

September 27, 2005

The Standard in Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06460

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

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

Important information about The EDR FieldCheck(TM) Report

This is The EDR FieldCheck (TM) Report. Through its continuing emphasis in online technological advancements, EDR has developed the FieldCheck (TM) system, which enables EDR's customers to make certain online modifications to the maps and text contained in EDR Radius Map Reports. With FieldCheck (TM), an EDR customer can relocate and/or delete plotted sites and/or plot or delete orphan sites that would otherwise appear or be noted with an EDR Radius Map Report. Such modifications may be based on site visits, independent data verification and/or other actions taken or decisions made by EDR's customer. As a result, the maps and text contained in The EDR FieldCheck (TM) Report that you receive may have been so modified. Please note: EDR has not taken any action to verify any such modifications, and this report and the findings set forth herein must be read in light of this fact. SECOR INTERNATIONAL, INC. should be contacted for information concerning all such modifications.

EXECUTIVE SUMMARY

At the request of SECOR INTERNATIONAL, INC., a search of the environmental records covering the area detailed herein was conducted by Environmental Data Resources, Inc. (EDR). This report was derived from the results of such search, which, as conducted by EDR, met the government records search requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-00. Search distances were per ASTM standard or custom distances requested by the user.

NOTE: ALL MAPS AND TEXT INCLUDED HEREIN MAY HAVE BEEN MODIFIED BY SECOR INTERNATIONAL, INC. BASED ON SITE VISITS, INDEPENDENT DATA VERIFICATION AND/OR OTHER ACTIONS TAKEN OR DECISIONS MADE BY SECOR INTERNATIONAL, INC.. EDR HAS NOT TAKEN ANY ACTION TO VERIFY ANY OF SUCH MODIFICATIONS, AND THIS REPORT AND THE FINDINGS SET FORTH HEREIN MUST BE READ IN LIGHT OF THIS FACT. SECOR INTERNATIONAL, INC. SHOULD BE CONTACTED FOR INFORMATION CONCERNING ALL SUCH MODIFICATIONS.

TARGET PROPERTY INFORMATION

ADDRESS

6100 LAWRENCEVILLE HWY
TUCKER, GA 30084

COORDINATES

Latitude (North):	33.869000 - 33° 52' 8.4''
Longitude (West):	84.176900 - 84° 10' 36.8''
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	761152.9
UTM Y (Meters):	3751024.2
Elevation:	1026 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property:	33084-G2 STONE MOUNTAIN, GA
Source:	USGS 7.5 min quad index

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

DATABASES WITH NO MAPPED SITES

No sites were found in an online review and analysis by SECOR INTERNATIONAL, INC. of EDR's search of available ("reasonably ascertainable") government records either on the target property or within the ASTM E 1527-00 search radius around the target property for the following databases:

FEDERAL ASTM STANDARD

NPL ---------- National Priority List
Proposed NPL ---------- Proposed National Priority List Sites
CERC-NFRAP ---------- CERCLIS No Further Remedial Action Planned
CORRACTS ---------- Corrective Action Report

EXECUTIVE SUMMARY

RCRA-TSDF Resource Conservation and Recovery Act Information
RCRA-LQG Resource Conservation and Recovery Act Information
ERNS Emergency Response Notification System

STATE ASTM STANDARD

SWF/LF Solid Waste Disposal Facilities

FEDERAL ASTM SUPPLEMENTAL

US ENG CONTROLS Engineering Controls Sites List
ODI Open Dump Inventory
UMTRA Uranium Mill Tailings Sites
FUDS Formerly Used Defense Sites
INDIAN RESERV Indian Reservations
DOD Department of Defense Sites

STATE OR LOCAL ASTM SUPPLEMENTAL

DRYCLEANERS Drycleaner Database

BROWNFIELDS DATABASES

US BROWNFIELDS A Listing of Brownfields Sites
US INST CONTROL Sites with Institutional Controls

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property.
Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

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

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

FEDERAL ASTM STANDARD

CERCLIS: The Comprehensive Environmental Response, Compensation and Liability Information System contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).
CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites

which are in the screening and assessment phase for possible inclusion on the NPL.

An online review and analysis by SECOR INTERNATIONAL, INC. of the CERCLIS list, as provided by EDR, and dated 06/27/2005 has revealed that there is 1 CERCLIS site within approximately 0.5 miles of the target property.

Lower Elevation	Address	Dist / Dir	Map ID	Page
CRYMES LANDFILL	***6180 LAWRENCEVILLE HWY***	***1/4 - 1/2W***	***4***	***13***

RCRAInfo: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System(RCRIS). The database includes selective information on sites which generate, transport, store , treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month Large quantity generators generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

An online review and analysis by SECOR INTERNATIONAL, INC. of the RCRA-SQG list, as provided by EDR, and dated 05/20/2005 has revealed that there is 1 RCRA-SQG site within approximately 0.25 miles of the target property.

Lower Elevation	Address	Dist / Dir	Map ID	Page
MAACO AUTO PAINTING & BODY WOR	6050 HWY 29	0 - 1/8 NNE	1	5

STATE ASTM STANDARD

SHWS: The State Hazardous Waste Sites records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. The data come from the Department of Natural Resources' Hazardous Site Inventory.

An online review and analysis by SECOR INTERNATIONAL, INC. of the SHWS list, as provided by EDR, has revealed that there are 2 SHWS sites within approximately 1 mile of the target property.

Lower Elevation	Address	Dist / Dir	Map ID	Page
BEN GOBER LANDFILL	411 MIMOSA DR. (OFF US	1/4 - 1/2N	3	12
CRYMES LANDFILL	***6180 LAWRENCEVILLE HWY***	***1/4 - 1/2W***	***4***	***13***

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

An online review and analysis by SECOR INTERNATIONAL, INC. of the LUST list, as provided by EDR, and dated 06/07/2005 has revealed that there is 1 LUST site within approximately 0.5 miles of the target property.

EXECUTIVE SUMMARY

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
LAWRENCEVILLE LAND & BLDG/CRAI	*6170 LAWRENCEVILLE HWY*	*1/8 - 1/4 WSW*	*2*	*5*

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

An online review and analysis by SECOR INTERNATIONAL, INC. of the UST list, as provided by EDR, and dated 01/21/2005 has revealed that there is 1 UST site within approximately 0.25 miles of the target property.

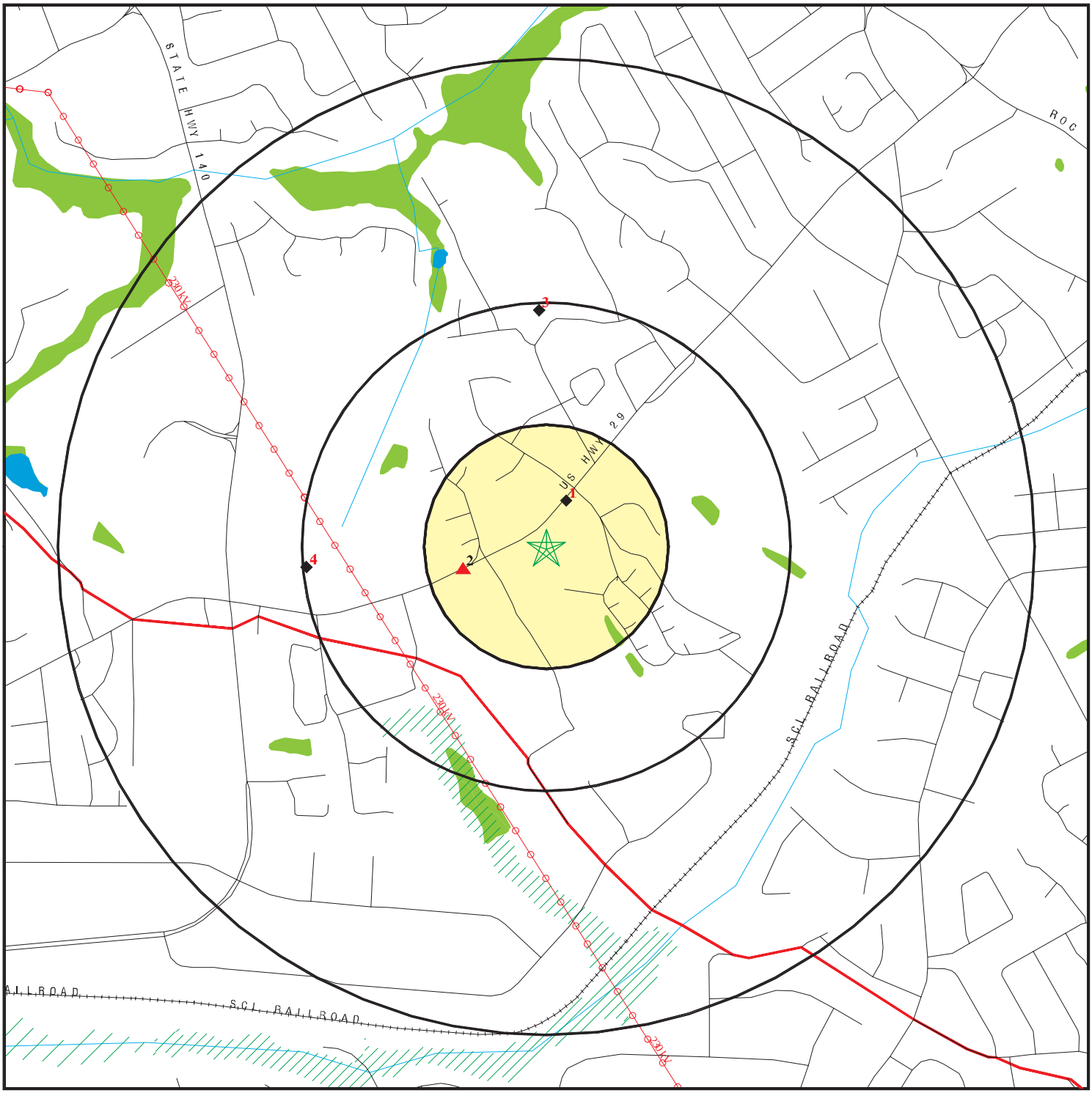
Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
LAWRENCEVILLE LAND & BLDG/CRAI	*6170 LAWRENCEVILLE HWY*	*1/8 - 1/4 WSW*	*2*	*5*

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

Site Name	Database(s)
B & L BODY SHOP	RCRA-SQG, FINDS
ATLANTA EUROPEAN COLLISION REPAIR	RCRA-SQG, FINDS
MCNAMARA ISUZU COMMERCIAL TRUCK	RCRA-SQG, FINDS

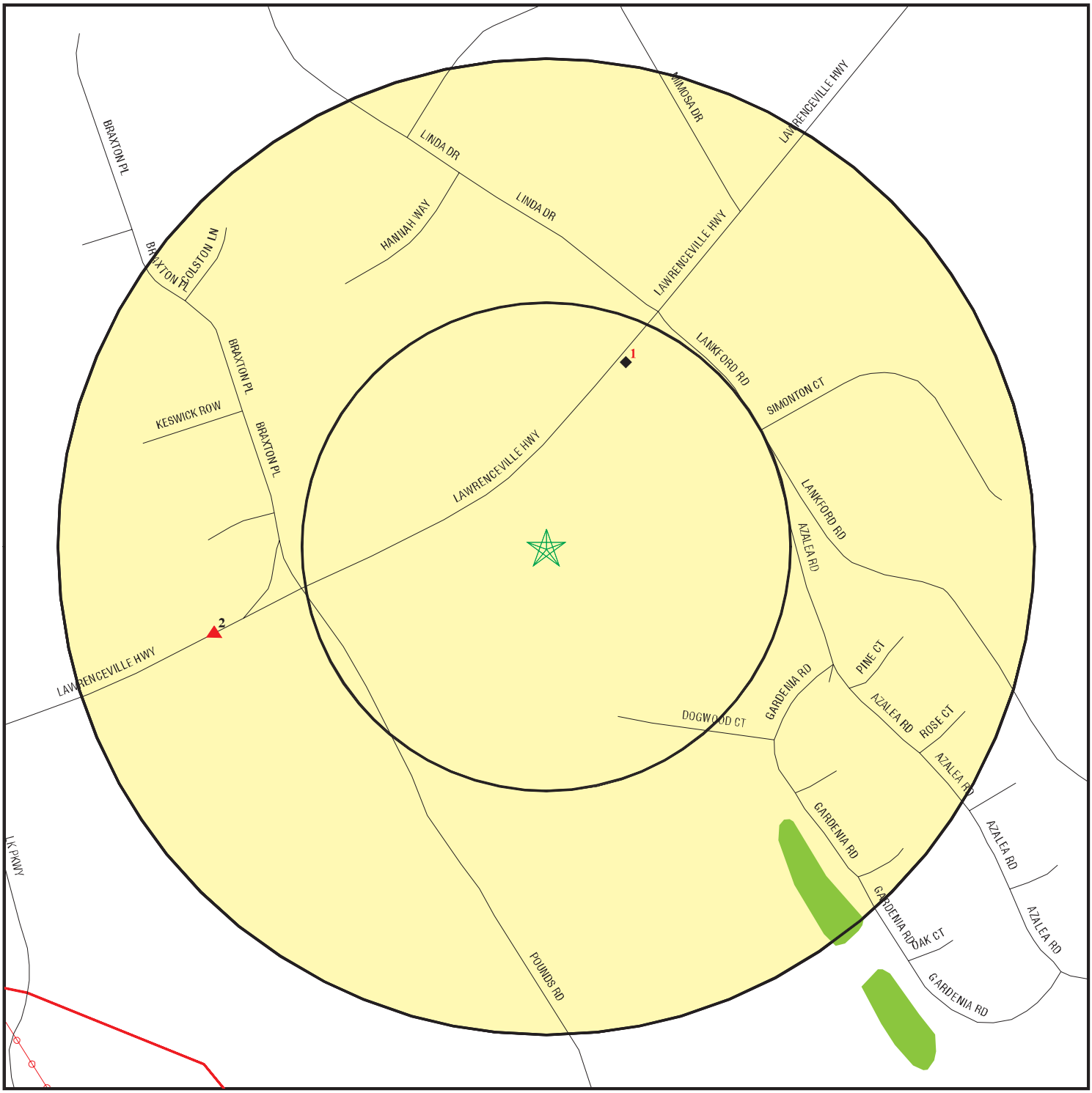
OVERVIEW MAP - 1520524.1s - SECOR International, Inc.



- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Coal Gasification Sites
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Indian Reservations BIA
- County Boundary
- Power transmission lines
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Federal Wetlands

TARGET PROPERTY:	Pike Nursery	CUSTOMER:	SECOR International, Inc.
ADDRESS:	6100 Lawrenceville Hwy	CONTACT:	Valerie Harris
CITY/STATE/ZIP:	Tucker GA 30084	INQUIRY #:	1520524.1s
LAT/LONG:	33.8690 / 84.1769	DATE:	September 27, 2005 7:23 pm

DETAIL MAP - 1520524.1s - SECOR International, Inc.



- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Coal Gasification Sites
- Sensitive Receptors
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Indian Reservations BIA
- County Boundary
- Power transmission lines
- Oil & Gas pipelines
- Federal Wetlands

0 1/16 1/8 1/4 Miles

N

TARGET PROPERTY:	Pike Nursery	CUSTOMER:	SECOR International, Inc.
ADDRESS:	6100 Lawrenceville Hwy	CONTACT:	Valerie Harris
CITY/STATE/ZIP:	Tucker GA 30084	INQUIRY #:	1520524.1s
LAT/LONG:	33.8690 / 84.1769	DATE:	September 27, 2005 7:23 pm

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
FEDERAL ASTM STANDARD								
NPL		1.000	0	0	0	0	NR	0
Proposed NPL		1.000	0	0	0	0	NR	0
CERCLIS		0.500	0	0	1	NR	NR	1
CERC-NFRAP		0.250	0	0	NR	NR	NR	0
CORRACTS		1.000	0	0	0	0	NR	0
RCRA TSD		0.500	0	0	0	NR	NR	0
RCRA Lg. Quan. Gen.		0.250	0	0	NR	NR	NR	0
RCRA Sm. Quan. Gen.		0.250	1	0	NR	NR	NR	1
ERNS		TP	NR	NR	NR	NR	NR	0
STATE ASTM STANDARD								
State Haz. Waste		1.000	0	0	2	0	NR	2
State Landfill		0.500	0	0	0	NR	NR	0
LUST		0.500	0	1	0	NR	NR	1
UST		0.250	0	1	NR	NR	NR	1
FEDERAL ASTM SUPPLEMENTAL								
US ENG CONTROLS		0.500	0	0	0	NR	NR	0
ODI		TP	NR	NR	NR	NR	NR	0
UMTRA		0.500	0	0	0	NR	NR	0
FUDS		1.000	0	0	0	0	NR	0
INDIAN RESERV		1.000	0	0	0	0	NR	0
DOD		TP	NR	NR	NR	NR	NR	0
STATE OR LOCAL ASTM SUPPLEMENTAL								
DRYCLEANERS		0.250	0	0	NR	NR	NR	0
BROWNFIELDS DATABASES								
US BROWNFIELDS		TP	NR	NR	NR	NR	NR	0
US INST CONTROL		0.500	0	0	0	NR	NR	0

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

1
NNE
< 1/8
544 ft.

MAACO AUTO PAINTING & BODY WORKS
6050 HWY 29
TUCKER, GA 30084

RCRA-SQG | **1004686373** | **GAD981019896**

Relative:
Lower

Actual:
1018 ft.

RCRAInfo:
Owner: JIMMY AMBURGERY
(404) 925-9130
EPA ID: GAD981019896
Contact: JIM AMBURGEY
(404) 925-9130
Classification: Conditionally Exempt Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

2
WSW
1/8-1/4
925 ft.

LAWRENCEVILLE LAND & BLDG/CRAIG'
6170 LAWRENCEVILLE HWY
TUCKER, GA 30084

LUST | **U001479820**
UST | **N/A**

Relative:
Higher

Actual:
1028 ft.

LUST:
Facility ID: 00670363
Leak ID: 1
Date Received: 01/21/92
Project Officer: Burris,Stephen B
Description: Confirmed Release Received

UST:
Facility ID: 670363
Total Tanks: 7
Tank ID: 1
Material: Bare Steel
Capacity: 2000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: AMRESCO INC
101 NORTH TRYON ST
CHARLOTTE, NC 28255
Owner Phone 704-386-3157
Product: Gas
Status: Installed
Status Date: 05/14/61
Pipe Type : Not Marked
Pipe Material: Bare Steel

Facility ID: 670363
Total Tanks: 7
Tank ID: 1
Material: Bare Steel
Capacity: 2000
Overfill Protection:
Spill Date : Not reported
Overfill Installed : Not reported
Tank Exempt From Spill : Not reported
Owner: AMRESCO INC
101 NORTH TRYON ST
CHARLOTTE, NC 28255

LAWRENCEVILLE LAND & BLDG/CRAIG' (Continued) **U001479820**

Owner Phone	704-386-3157
Product:	Gas
Status:	Removed From Ground
Status Date:	07/14/93
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	1
Material:	Bare Steel
Capacity:	2000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Gas
Status:	Upgrade Repair Not Marked
Status Date:	/ /
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	2
Material:	Bare Steel
Capacity:	2000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Gas
Status:	Installed
Status Date:	05/14/61
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	2
Material:	Bare Steel
Capacity:	2000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255

LAWRENCEVILLE LAND & BLDG/CRAIG' (Continued) **U001479820**

Owner Phone	704-386-3157
Product:	Gas
Status:	Removed From Ground
Status Date:	07/14/93
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	2
Material:	Bare Steel
Capacity:	2000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Gas
Status:	Upgrade Repair Not Marked
Status Date:	/ /
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	3
Material:	Bare Steel
Capacity:	2000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Gas
Status:	Installed
Status Date:	01/01/61
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	3
Material:	Bare Steel
Capacity:	2000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255

LAWRENCEVILLE LAND & BLDG/CRAIG' (Continued) **U001479820**

Owner Phone	704-386-3157
Product:	Gas
Status:	Removed From Ground
Status Date:	07/14/93
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	3
Material:	Bare Steel
Capacity:	2000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Gas
Status:	Upgrade Repair Not Marked
Status Date:	/ /
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	4
Material:	Bare Steel
Capacity:	2000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Diesel
Status:	Installed
Status Date:	05/08/84
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	4
Material:	Bare Steel
Capacity:	2000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255

LAWRENCEVILLE LAND & BLDG/CRAIG' (Continued) **U001479820**

Owner Phone	704-386-3157
Product:	Diesel
Status:	Removed From Ground
Status Date:	07/14/93
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	4
Material:	Bare Steel
Capacity:	2000
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Diesel
Status:	Upgrade Repair Not Marked
Status Date:	/ /
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	5
Material:	Bare Steel
Capacity:	500
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Kerosene
Status:	Installed
Status Date:	05/14/58
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	5
Material:	Bare Steel
Capacity:	500
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255

LAWRENCEVILLE LAND & BLDG/CRAIG' (Continued) **U001479820**

Owner Phone	704-386-3157
Product:	Kerosene
Status:	Removed From Ground
Status Date:	07/14/93
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	5
Material:	Bare Steel
Capacity:	500
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Kerosene
Status:	Upgrade Repair Not Marked
Status Date:	/ /
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	6
Material:	Bare Steel
Capacity:	500
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Gas
Status:	Installed
Status Date:	05/14/58
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	6
Material:	Bare Steel
Capacity:	500
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255

LAWRENCEVILLE LAND & BLDG/CRAIG' (Continued) **U001479820**

Owner Phone	704-386-3157
Product:	Gas
Status:	Removed From Ground
Status Date:	07/14/93
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	6
Material:	Bare Steel
Capacity:	500
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Gas
Status:	Upgrade Repair Not Marked
Status Date:	/ /
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	7
Material:	Bare Steel
Capacity:	250
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Other
Status:	Installed
Status Date:	05/14/58
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	7
Material:	Bare Steel
Capacity:	250
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255

LAWRENCEVILLE LAND & BLDG/CRAIG' (Continued) **U001479820**

Owner Phone	704-386-3157
Product:	Other
Status:	Removed From Ground
Status Date:	07/14/93
Pipe Type :	Not Marked
Pipe Material:	Bare Steel
Facility ID:	670363
Total Tanks:	7
Tank ID:	7
Material:	Bare Steel
Capacity:	250
Overfill Protection:	
Spill Date :	Not reported
Overfill Installed :	Not reported
Tank Exempt From Spill :	Not reported
Owner:	AMRESCO INC 101 NORTH TRYON ST CHARLOTTE, NC 28255
Owner Phone	704-386-3157
Product:	Other
Status:	Upgrade Repair Not Marked
Status Date:	/ /
Pipe Type :	Not Marked
Pipe Material:	Bare Steel

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3 **BEN GOBER LANDFILL** **SHWS S103224264**
North **411 MIMOSA DR. (OFF US 29)** **N/A**
1/4-1/2 **TUCKER, GA 30084**
2559 ft.

Relative:
Lower

Actual:
991 ft.

SHWS:

Facid:	10297
Lat/Long:	33 52' 33" N / 84 10' 40" W
Owner:	Estate of Ben Gober c/o Victor Deaton, Sr., Executor 5904 Mimosa Dr. Tucker, GA 30084

Description of regulated substances released at the site:

This site has a known release of Lead 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 b, y the release. Other substances in groundwater: Barium; Chromium; Copper; Nickel; Zinc. This site has a known release of Lead in soil at levels exceeding the reportable quantity. This site has unlimited access. The nearest resident individual is betw, een 1001 and 3000 feet from the area affected by the release. Other substances on site: Chromium; Copper; Nickel; Arsenic; Ethylbenzene; Mercury; PCBs; Toluene; Trichloroethene; Xylenes.
Not reported

Cleanup Priority:	Cleanup activities are being conducted for source materials, soil, and groundwater.
EDP Directive:	Pending

4
West
1/4-1/2
2601 ft.

Relative:
Lower

Actual:
1000 ft.

CRYMES LANDFILL
6180 LAWRENCEVILLE HWY
TUCKER, GA 30084

CERCLIS
SHWS

1000481280
GAD980495220

CERCLIS Classification Data:

Federal Facility:	Status Undetermined		
Non NPL Status:	NFRAP		
NPL Status:	Not on the NPL		
Contact:	Beth Brown	Contact Tel:	(404) 562-8814
Contact Title:	Not reported		
Contact:	RANDALL CHAFFINS	Contact Tel:	(404) 562-8910
Contact Title:	Not reported		
Contact:	BARBARA DICK	Contact Tel:	(404) 562-8923
Contact Title:	Not reported		
Contact:	Brian Farrier	Contact Tel:	(404) 562-8952
Contact Title:	Not reported		
Contact:	Ralph Howard	Contact Tel:	(404) 562-8829
Contact Title:	Not reported		
Contact:	William Joyner	Contact Tel:	(404) 562-8795
Contact Title:	Not reported		
Contact:	Carol Monell	Contact Tel:	(404) 562-8719
Contact Title:	Not reported		
Contact:	Mike Norman	Contact Tel:	(404) 562-8792
Contact Title:	Not reported		
Site Description:	USED BY KOPPERS CO UNION CARBIDE, DUPONT, UNION OIL, AND HERCULES CONTAINING ORGANICS, ACIDS AND HEAVY METALS IN A LANDFILL.		

CERCLIS Assessment History:

Assessment:	DISCOVERY	Completed:	11/01/1979
Assessment:	PRELIMINARY ASSESSMENT	Completed:	03/31/1986
Assessment:	SITE INSPECTION	Completed:	05/16/1986
Assessment:	EXPANDED SITE INSPECTION	Completed:	06/25/1991

CERCLIS Site Status:
NFRAP (No Futher Remedial Action Planned

CERCLIS Alias Name(s):
CRYMES LANDFILL
CRYMES ENTERPRISES

SHWS:

Facid:	10292
Lat/Long:	33 52’ 19" N / 84 11’ 7" W
Owner:	Est. of Frances M. Heard Crymes, Exec. Betty Anderson c/o J. E. Cheeley, Jr. 345 East Main Street Buford, GA 30518

Description of regulated substances released at the site:

This site has a known release of Vinyl chloride 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 less than 0.5 miles from the area affe, cted by the release. Other substances in groundwater: 1,1,1-Trichloroethane; Dichlorobromomethane; Tetrachloroethene; 1,1-Dichloroethane; Chloroform; p-Dichlorobenzene; Toluene; Xylenes; Acetone; 1,2-Dichloroethane; Chloroethane; 1,2-Dichloropropane;, Dichloroethylene, N.O.S.; Methyl ethyl ketone; Benzene; Carbon disulfide; Chlorobenzene. This site has a known release of PCBs in soil at levels exceeding the reportable quantity. This site has unlimited access. The nearest resident individual is le, ss than 300 feet from the area affected by the release. Other substances on site: Phenol; Lead; Ethylbenzene; 1,1,1-Trichloroethane; Tetrachloroethene; 1,1-Dichloroethane; Chloroform; p-Dichlorobenzene; bis(2-Ethylhexyl) phthalate; Chromium; Copper;, Nickel; Zinc; Dichloromethane; Toluene; Vinyl chloride; Acetone; Methyl ethyl ketone; Benzene; Carbon disulfide; Chlorobenzene.

CRYMES LANDFILL (Continued) **1000481280**

Not reported
Cleanup Priority: Cleanup activities are being conducted for source materials, soil, and groundwater.
EDP Directive: Pending

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
TUCKER	1000121562	B & L BODY SHOP	3862 LAWRENCEVILLE HWY	30084	RCRA-SQG, FINDS
TUCKER	1000449274	ATLANTA EUROPEAN COLLISION REPAIR	3807-B LAWRENCEVILLE HWY	30084	RCRA-SQG, FINDS
TUCKER	1000282738	MCNAMARA ISUZU COMMERCIAL TRUCK	2915 LAWRENCEVILLE HWY	30084	RCRA-SQG, FINDS

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Elapsed ASTM days: Provides confirmation that this EDR report meets or exceeds the 90-day updating requirement of the ASTM standard.

FEDERAL ASTM STANDARD RECORDS

NPL: National Priority List
Source: EPA
Telephone: N/A
National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 07/01/05
Date Made Active at EDR: 08/22/05
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 08/03/05
Elapsed ASTM days: 19
Date of Last EDR Contact: 08/03/05

NPL Site Boundaries

Sources:

EPA's Environmental Photographic Interpretation Center (EPIC)
Telephone: 202-564-7333

EPA Region 1
Telephone 617-918-1143

EPA Region 3
Telephone 215-814-5418

EPA Region 4
Telephone 404-562-8033

EPA Region 6
Telephone: 214-655-6659

EPA Region 8
Telephone: 303-312-6774

Proposed NPL: Proposed National Priority List Sites
Source: EPA
Telephone: N/A

Date of Government Version: 04/27/05
Date Made Active at EDR: 05/16/05
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 05/04/05
Elapsed ASTM days: 12
Date of Last EDR Contact: 08/05/05

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System
Source: EPA
Telephone: 703-413-0223
CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 06/27/05
Date Made Active at EDR: 08/17/05
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 07/22/05
Elapsed ASTM days: 26
Date of Last EDR Contact: 07/22/05

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned
Source: EPA
Telephone: 703-413-0223
As of February 1995, CERCLIS sites designated "No Further Remedial Action Planned" (NFRAP) have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund action or NPL consideration. EPA has removed approximately 25,000 NFRAP sites to lift the unintended barriers to the redevelopment of these properties and has archived them as historical records so EPA does not needlessly repeat the investigations in the future. This policy change is part of the EPA's Brownfields Redevelopment Program to help cities, states, private investors and affected citizens to promote economic redevelopment of unproductive urban sites.

Date of Government Version: 05/17/05
Date Made Active at EDR: 08/17/05
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 06/20/05
Elapsed ASTM days: 58
Date of Last EDR Contact: 06/20/05

CORRACTS: Corrective Action Report
Source: EPA
Telephone: 800-424-9346
CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 06/28/05
Date Made Active at EDR: 08/08/05
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 07/05/05
Elapsed ASTM days: 34
Date of Last EDR Contact: 06/05/05

RCRA: Resource Conservation and Recovery Act Information
Source: EPA
Telephone: 800-424-9346
RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS). The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month. Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 05/20/05
Date Made Active at EDR: 06/09/05
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 05/24/05
Elapsed ASTM days: 16
Date of Last EDR Contact: 08/23/05

ERNS: Emergency Response Notification System
Source: National Response Center, United States Coast Guard
Telephone: 202-260-2342
Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 12/31/04
Date Made Active at EDR: 03/24/05
Database Release Frequency: Annually
Date of Data Arrival at EDR: 01/27/05
Elapsed ASTM days: 56
Date of Last EDR Contact: 07/25/05

FEDERAL ASTM SUPPLEMENTAL RECORDS

BRS: Biennial Reporting System
Source: EPA/NTIS
Telephone: 800-424-9346
The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/03
Database Release Frequency: Biennially
Date of Last EDR Contact: 06/17/05
Date of Next Scheduled EDR Contact: 09/12/05

DOD: Department of Defense Sites
Source: USGS
Telephone: 703-692-8801
This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 10/01/03
Database Release Frequency: Semi-Annually
Date of Last EDR Contact: 08/09/05
Date of Next Scheduled EDR Contact: 11/07/05

UMTRA: Uranium Mill Tailings Sites
Source: Department of Energy
Telephone: 505-845-0011
Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized. In 1978, 24 inactive uranium mill tailings sites in Oregon, Idaho, Wyoming, Utah, Colorado, New Mexico, Texas, North Dakota, South Dakota, Pennsylvania, and on Navajo and Hopi tribal lands, were targeted for cleanup by the Department of Energy.

Date of Government Version: 12/29/04
Database Release Frequency: Varies
Date of Last EDR Contact: 07/05/05
Date of Next Scheduled EDR Contact: 09/19/05

ODI: Open Dump Inventory
Source: Environmental Protection Agency
Telephone: 800-424-9346
An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria.

Date of Government Version: 06/30/85
Database Release Frequency: No Update Planned
Date of Last EDR Contact: 05/23/95
Date of Next Scheduled EDR Contact: N/A

FUDS: Formerly Used Defense Sites
Source: U.S. Army Corps of Engineers
Telephone: 202-528-4285
The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 12/31/04
Database Release Frequency: Varies
Date of Last EDR Contact: 06/29/05
Date of Next Scheduled EDR Contact: 10/03/05

INDIAN RESERV: Indian Reservations
Source: USGS
Telephone: 202-208-3710
This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 10/01/03
Database Release Frequency: Semi-Annually
Date of Last EDR Contact: 08/09/05
Date of Next Scheduled EDR Contact: 11/07/05

US ENG CONTROLS: Engineering Controls Sites List
Source: Environmental Protection Agency
Telephone: 703-603-8867
A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Date of Government Version: 01/10/05
Database Release Frequency: Varies
Date of Last EDR Contact: 07/05/05
Date of Next Scheduled EDR Contact: 10/03/05

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

STATE OF GEORGIA ASTM STANDARD RECORDS

SHWS: Hazardous Site Inventory
Source: Department of Environmental Protection
Telephone: 404-657-8600
State Hazardous Waste Sites. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. Available information varies by state.

Date of Government Version: 07/01/04
Date Made Active at EDR: 11/03/04
Database Release Frequency: Annually
Date of Data Arrival at EDR: 10/19/04
Elapsed ASTM days: 15
Date of Last EDR Contact: 06/06/05

SWF/LF: Solid Waste Disposal Facilities
Source: Department of Natural Resources
Telephone: 404-362-2696
Source: Center for GIS, Georgia Institute of Technology
Telephone: 404-385-0900
Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 09/06/05
Date Made Active at EDR: 09/27/05
Database Release Frequency: Semi-Annually
Date of Data Arrival at EDR: 09/06/05
Elapsed ASTM days: 21
Date of Last EDR Contact: 08/29/05

LUST: List of Leaking Underground Storage Tanks
Source: Environmental Protection Division
Telephone: 404-362-2687
Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 06/07/05
Date Made Active at EDR: 08/05/05
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 07/12/05
Elapsed ASTM days: 24
Date of Last EDR Contact: 07/12/05

UST: Underground Storage Tank Database
Source: Environmental Protection Division
Telephone: 404-362-2687
Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 01/21/05
Date Made Active at EDR: 02/23/05
Database Release Frequency: Annually
Date of Data Arrival at EDR: 01/27/05
Elapsed ASTM days: 27
Date of Last EDR Contact: 07/11/05

STATE OF GEORGIA ASTM SUPPLEMENTAL RECORDS

DRYCLEANERS: Drycleaner Database
Source: Department of Natural Resources
Telephone: 404-363-7000
A listing of drycleaners in Georgia.

Date of Government Version: 06/23/05
Database Release Frequency: Varies
Date of Last EDR Contact: 06/23/05
Date of Next Scheduled EDR Contact: N/A

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

BROWNFIELDS DATABASES

US BROWNFIELDS: A Listing of Brownfields Sites
Source: Environmental Protection Agency
Telephone: 202-566-2777
Included in the listing are brownfields properties addresses by Cooperative Agreement Recipients and brownfields properties addressed by Targeted Brownfields Assessments. Targeted Brownfields Assessments-EPA's Targeted Brownfields Assessments (TBA) program is designed to help states, tribes, and municipalities--especially those without EPA Brownfields Assessment Demonstration Pilots--minimize the uncertainties of contamination often associated with brownfields. Under the TBA program, EPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. Targeted Brownfields Assessments supplement and work with other efforts under EPA's Brownfields Initiative to promote cleanup and redevelopment of brownfields. Cooperative Agreement Recipients-States, political subdivisions, territories, and Indian tribes become Brownfields Cleanup Revolving Loan Fund (BCRLF) cooperative agreement recipients when they enter into BCRLF cooperative agreements with the U.S. EPA. EPA selects BCRLF cooperative agreement recipients based on a proposal and application process. BCRLF cooperative agreement recipients must use EPA funds provided through BCRLF cooperative agreement for specified brownfields-related cleanup activities.

Date of Government Version: 01/10/05
Database Release Frequency: Semi-Annually
Date of Last EDR Contact: 06/13/05
Date of Next Scheduled EDR Contact: 09/12/05

US INST CONTROL: Sites with Institutional Controls
Source: Environmental Protection Agency
Telephone: 703-603-8867
A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Date of Government Version: 01/10/05
Database Release Frequency: Varies
Date of Last EDR Contact: 07/05/05
Date of Next Scheduled EDR Contact: 10/03/05

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

Oil/Gas Pipelines: This data was obtained by EDR from the USGS in 1994. It is referred to by USGS as GeoData Digital Line Graphs from 1:100,000-Scale Maps. It was extracted from the transportation category including some oil, but primarily gas pipelines.

Electric Power Transmission Line Data
Source: PennWell Corporation
Telephone: (800) 823-6277
This map includes information copyrighted by PennWell Corporation. This information is provided on a best effort basis and PennWell Corporation does not guarantee its accuracy nor warrant its fitness for any particular purpose. Such information has been reprinted with the permission of PennWell.

Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:
Source: American Hospital Association, Inc.
Telephone: 312-280-5991
The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing
Source: Centers for Medicare & Medicaid Services
Telephone: 410-786-3000
A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services, a federal agency within the U.S. Department of Health and Human Services.

Nursing Homes
Source: National Institutes of Health
Telephone: 301-594-6248
Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools
Source: National Center for Education Statistics
Telephone: 202-502-7300
The National Center for Education Statistics' primary database on elementary and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.

Private Schools
Source: National Center for Education Statistics
Telephone: 202-502-7300
The National Center for Education Statistics' primary database on private school locations in the United States.

Daycare Centers: Child Care Centers
Source: Department of Human Resources
Telephone: 404-651-5562

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1999 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 from the U.S. Fish and Wildlife Service.

STREET AND ADDRESS INFORMATION

Fax To: SECOR International, Inc.
Contact: Valerie Harris
Fax : 804-271-0671
Date: 09/27/2005

Fax From: Jeff Weiss
EDR
Phone: 1-800-352-0050

EDR PUR-IQ® Report

"the intelligent way to conduct historical research"

for
Pike Nursery
6100 Lawrenceville Hwy
Tucker, GA 30084
Lat./Long. 33.86900 / 84.17690
EDR Inquiry # 1520524.1s

The EDR PUR-IQ report facilitates historical research planning required to complete the Phase I ESA process. The report identifies the *likelihood* of prior use coverage by searching EDR's proprietary historical source(s) database comprising nationwide information on: city directories, fire insurance maps, aerial photographs, historical topographic maps, flood maps and National Wetland Inventory maps.

Potential for EDR Historical (Prior Use) Coverage - Coverage in the following historical information sources may be used as a guide to develop your historical research strategy:

1. City Directory: Coverage may exist for portions of Gwinnett County, GA.

2. Fire Insurance Map: When you order online any ASTM 2000 Package, or an EDR Radius Map with a Sanborn Map Search/Print, you receive site specific Sanborn Map coverage information at no charge.

3. Aerial Photograph: Coverage exists for portions of Gwinnett County for the following decades: s, 1960s, 1970s, 1980s Shipping time 3-5 business days.

4. Topographic Map: The USGS 7.5 min. quad topo sheet(s) associated with this site:

Historical: Coverage exists for GWINNETT County

Current: Target Property: 33084-G2 Stone Mountain, GA
Additional required for 1 Mile radius: 33084-H2 Norcross, GA

5. Flood Insurance Rate Maps (FEMA) : Coverage is available for Gwinnett County

EDR's network of professional researchers, located throughout the United States, accesses the most extensive national collections of city directory, fire insurance maps, aerial photographs, flood maps and historical topographic map resources available for Tucker, GA. These collections may be located in multiple libraries throughout the country. To ensure maximum coverage, EDR will often assign researchers at these multiple locations on your behalf. Please call or fax your EDR representative to authorize a search.

EDR - HISTORICAL SOURCE(S) ORDER FORM

SECOR International, Inc.
Valerie Harris
Account # 1292223

Pike Nursery
6100 Lawrenceville Hwy
Tucker, GA 30084
GWINNETT County
Lat./Long. 33.86900 / 84.17690
EDR Inquiry # 1520524.1s

Should you wish to change or add to your order, fax this form to your EDR account executive:

Jeff Weiss
Ph: 1-800-352-0050 Fax: 1-800-231-6802

Product	Standard Price**	Standard Turnaround time
___ **Historical** Topographic Map(s)	ALL AVAIL. YRS $45/95	3 - 5 BUSINESS DAYS
___ **Current** Topographic Map(s)*	$30 EACH	3 - 5 BUSINESS DAYS
___ City Directory Abstract	SEARCH/ABSTRACT $45/95	3 - 5 BUSINESS DAYS
___ Fire Insurance Map Search/Abstract	SEARCH/ABSTRACT $45/95	3 - 5 BUSINESS DAYS
___ Sanborn Map Search/Print		
___ with Radius Map	SEARCH/PRINT $15/75	2 - 3 BUSINESS DAYS
___ a la carte	SEARCH/PRINT $45/125	2 - 3 BUSINESS DAYS
___ Aerial Photograph Search Summary	$49	48 HOURS
___ Aerial Photo Decade Pkg.	$95 (WHERE AVAILABLE)	3 - 5 BUSINESS DAYS
(AL,AZ,CA,CO,CT,DC,DE,FL,GA,IL,IN,KS,MA,MD,MI,MN,MO)		
(NC,NJ,NY,OH,OK,OR,PA,SC,TN,TX,UT,VA,WA,WI)		
___ Digital Copies	$145 (CA,MI,FL,NJ,MN,TX,WI)	
___ USGS Aerial 5 Package	$255 (RUSH AVAILABLE)	15+ BUSINESS DAYS
___ USGS Aerial 3 Package	$210 (RUSH AVAILABLE)	15+ BUSINESS DAYS
___ Telephone Interviews	$95	3 - 5 BUSINESS DAYS
___ Expanded Telephone Interviews	$145	5 BUSINESS DAYS
___ Flood Insurance Maps (FEMA)	$95	3 - 5 BUSINESS DAYS
___ Flood Prone Maps	$95	3 - 5 BUSINESS DAYS
___ Chain of Title Search		CALL EDR
___ NJ MacRae's Industrial Directory Search (New Jersey)		CALL EDR
___ with Radius Map	$150	
___ a la carte	$195	
___ Multi-Tenant Retail Facility Report		
___ with Radius Map	SEARCH/ABSTRACT $45/$125	
___ a la carte	SEARCH/ABSTRACT $45/$150	

Shipping:

___ Email (Text Reports/Abstracts)	No charge	
___ Express, Next Day Delivery	$15	RUSH SERVICE IS AVAILABLE
___ Express, Second Day Delivery	$10	
___ Express, Next day Delivery	Customer Account	Acct # _____
___ Express, Second Day Delivery	Customer Account	Acct # _____
___ U.S. Mail	$5	

***May be ordered directly from FASTMAPS at 1-800-426-8676. The cost is $5.50 each map, plus shipping, plus $5 handling for orders less than 5 maps.**
****Special pricing, depending on volume, may exist for your account.**

Thank you