

January 27, 2014



Mr. David Reuland
Unit Coordinator
Response and Remediation Program
Georgia Department of Natural Resources
2 Martin Luther King Jr. Drive, Suite 1054
Atlanta, GA 30334

Mr Carter Williamson
U.S. EPA Region 4
61 Forsyth Street, Mail Code 9T25
Atlanta, GA 30303

Subject: Response to EPD Comments dated May 30, 2014
Former ESB, Inc. Site (HSI 10778), 1246 Allene Avenue, Atlanta, Georgia

Dear Mr. Reuland and Mr. Williamson:

Amec Foster Wheeler Environment & Infrastructure, Inc., on behalf of Exide Technologies (Exide) is pleased to submit responses to the Georgia Environmental Protection Division (EPD) comments dated May 30, 2014. The responses outline a revised path forward for site remediation based upon our review of the EPD comments and subsequent discussions in our site meeting on October 3, 2014. The EPD comments are listed below in *italic* text, followed by Exide's responses.

A. Review of Georgia Regulatory Framework

The site is currently listed on the Georgia Hazardous Site Inventory. As such, the site is subject to the Georgia Hazardous Site Response Act (OCGA 12-8-90 et seq.) and the Rules for Hazardous Site Response (Chapter 391-3-19). The Rules for Hazardous Site Response provide for five types of cleanup standards, known as Risk Reduction Standards (RRS). These are Type 1 (default residential), Type 2 (site-specific residential), Type 3 (default non-residential), Type 4 (site-specific non-residential), and Type 5 (includes engineering and institutional controls). Under Type 1 - 4 RRS, soil and groundwater must meet standards at any point within the media. Type 5 RRS are only applicable where Type 1 - 4 RRS are not appropriate under present circumstances.

The Georgia Voluntary Remediation Program (VRP) provides for discretionary use of area averaging (i.e., representative concentration) to demonstrate compliance with site-specific RRS at enrolled properties. As provided by the VRP Act (OCGA 12-8-100 et seq.), area averaging is to be conducted consistent with USEPA guidance. However, in accordance with Section 12-8-105(2)(8) of the VRP Act, the former Exide property is currently not eligible for enrollment because it is undergoing response activities required by a USEPA administrative order. Thus, response activities required by the USEPA order would have to be completed before the property could be eligible for both enrollment in the VRP and discretionary use of area averaging to comply with site-specific RRS.

Exide Response to Comment A:

As detailed in the responses to EPD comments B and C, Exide proposes to remediate the site to satisfy the USEPA order, close out the USEPA order, enter the site into the VRP, and close out the site using a Type 4 cleanup standard.

B. Comments on the Proposed Area Averaging for Lead in Surface Soil

1. *Exposure Units.* EPD does not agree with the proposed use of the entire property (approximately 8.5 acres) as the exposure unit for unrestricted future residential use. EPD would require that any exposure units used for risk assessment be clearly identified in a Uniform Environmental Covenant to ensure that, if land use changes are proposed in the future (e.g., subdivided residential lots, designated playgrounds, etc.), exposure units will be reassessed accordingly to be representative and protective of the proposed land use scenario.
2. *Use of Soil Data to Calculate the Exposure Point Concentration for Direct Exposure to Lead in Surface Soil.* Soil from 0- 2 feet below the ground surface (bgs) is considered surface soil under both the Rules for Hazardous Site Response and the Voluntary Remediation Program. At most soil sampling locations, lead was analyzed in surface soil at depths of 0 - 6 inches, 6 - 12 inches, and 12 - 24 inches bgs. The proposed Remediation Action Level (RAL) of 2,900 mg/kg appears to be based on the calculation of an exposure point concentration using essentially all data collected from the 0 - 2 feet bgs interval, including data from multiple depths at each sampling location. USEPA guidance recommends that exposure to lead in surface soil should generally be assessed using soil from the 0 - 1 inch bgs interval, and that deeper soil sampling may be appropriate for consideration of future use. Therefore, EPD would accept an exposure point concentration calculated using lead concentrations from 0 - 6 inches bgs at each sampling location. The RAL calculated for this exposure point concentration would then be applied to soil from 0- 2 feet bgs.

C. Acceptable Site-Specific Options for Lead in Soil under the Rules for Hazardous Site Response

EPD has identified two site-specific options for lead in soil that would be acceptable under the current applicable regulations, which are the Rules for Hazardous Site Response.

1. Soil Type 2 RRS (Residential): 325 mg/kg (IEUBK Model result, all points)
2. Soil Type 4 RRS (Non-Residential):
 - a. 0- 2 feet bgs: 930 mg/kg (Georgia Adult Lead Model result, all points)
 - b. Extending the excavation to 5 feet bgs in the North Yard (i.e., vicinity of the former Acid House) and in grids E11 and E12 to address lead-impacted, low pH soil. EPD would accept in-situ stabilization in these areas in lieu of excavation below 2 feet bgs. Soil pH data could be used to further refine areas where remediation below 2 feet bgs is needed.

The Soil Type 4 RRS approach is a variation of Exide Option 3. EPD finds this approach preferable to Exide Option 4 because the Soil Type 4 RRS would meet non-residential standards under current requirements, exposure units would not have to be re-assessed for changes in non-residential use scenarios, and area averaging to demonstrate compliance with

site-specific residential RRS would still be possible if the property is entered into the Voluntary Remediation Program.

Exide Response to Comments B and C:

In a meeting on October 3, 2014, EPD suggested that an acceptable course of action would be to remove lead impacted soils in the 0 to 12 inch interval that exceed the Type 4 soil RRS of 930 mg/kg (based on the Georgia Adult Lead Model). In addition, Exide will remove 4 soil samples in the 12-24 inch interval that exceed 4,000 mg/kg as potential “hot spots”. Remaining soils in the 0-24 inch interval would then have an average concentration of 274 mg/kg, which would comply with the EPA OSWER Directive 9355.4-12 that recommends a 400 mg/kg screening level of lead in soil for residential properties and also be below the Type 2 soil RRS of 325 mg/kg (based on the IEUBK model).

Per the HSRA Rule, the surface soil interval was defined as the top 24 inches (2 feet) of soil. A summary of the available data in the surface interval is provided on Table 1. The locations of the samples are provided on Figure 1. Samples in the top 12 inches of soil that exceeded the Type 4 RRS of 930 mg/kg for lead and in the 12 to 24 inch soil interval greater than 4,000 mg/kg were identified. Sample intervals with an ending depth greater than 12 inches were included in the Type 4 RRS comparison if all or part of the interval was included in the top 12 inches (e.g., 0 to 24 inches). Samples within the 0 to 24 inch interval that are above the remedial goals are bolded on Table 1. These samples are flagged for removal, and excavation in these locations is intended to result in an area-wide mean lead concentration that meets the USEPA residential soil requirement of 400 mg/kg. The area-wide mean lead concentration in surface soils (0 to 2 feet bgs) was done after removing the samples flagged for excavation from the data set. The mean lead concentration of the remaining soil samples is provided on Table 2. The mean lead concentration of residual surface soils is 274 mg/kg, which meets the USEPA residential soil requirements for lead. Excavation of deeper soils in the North Yard and in grids E11 and E12 will be evaluated as the excavation progresses based on field screening of pH and confirmation sampling for lead.

Per EPD comments, area-wide averaging is not available for the site until it enters the VRP. We understand that the USEPA Administrative Order will have to be closed out before the Exide Allene site can enter the VRP. Therefore, Exide proposes to proceed with the site cleanup using 930 mg/kg as the remedial goal for the top 0-12 inches, 4,000 mg/kg as the remedial goal for 12-24 inches, and then certify compliance with an area-wide average surface soil concentration of 274 mg/kg in order to remove the site from the Administrative Order.

After the Administrative Order is removed, Exide will apply an environmental covenant on the property limiting it to non-residential land use and also request participation in the VRP from EPD.

Redevelopment plans for the property have not been finalized, but could include residential redevelopment. Should this be the case, specific portions or sub-parcels of the site may need to be reevaluated later under a residential use scenario to demonstrate certification with the Type 2 residential standard of 325 mg/kg for residential exposure units, consistent with residential apartment or condominium development. The environmental covenant would then be revised consistent with the future land use.

D. Other Regulated Substances

1. *Areas of battery casing material, such as those identified in the April 2008 Corrective*

Action Plan (grids A15, A16, B15, B16), will need to be included in the excavation.

Exide Response to Comment D.1:

Excavation will be conducted in the area of grid A15 and A16, as indicated on Figure 1, based upon the previous sampling result from A15 that exceeds remedial goals. The excavation will be extended toward grids B15 and B16 based on visual observations of battery casing material and confirmation sampling results to further evaluate whether additional excavation in this area is necessary.

2. *According to a March 14, 2006 letter (enclosed), polychlorinated biphenyls (PCBs) were detected in soil surrounding a transformer pad on an easement owned by Georgia Power Company. The letter states that a remediation plan for PCBs was approved by USEPA but the plan had not been implemented because the PCB-impacted soil was also impacted by lead. If remediation of PCB-impacted soil has not been conducted, this should be addressed in the Corrective Action Plan.*

Exide Response to Comment D.2:

The area of PCB-impacted soil will be excavated in conjunction with the lead remediation work. The PCB-impacted soil will be segregated and characterized separately from the other soils to evaluate disposal requirements.

3. *The February 2006 Compliance Status Report states that groundwater samples collected in November 2005 were analyzed for target compound list (TCL) volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) and that the results were non-detect. However, it appears that only constituents previously detected in soil were reported in the laboratory analytical data. EPD will require an additional groundwater sampling event for full-scan TCL VOCs and SVOCs unless Exide is able to provide laboratory data that shows full-scan TCL analysis of the November 2005 samples.*

Exide Response to Comment D.3:

The next round of groundwater sampling will include full-scan TCL analysis for VOCs and SVOCs.

4. *The Groundwater Type 1 and 3 RRS for benzo(a)anthracene is 0.0001 mg/L as opposed to 0.0002 mg/L. The proposed RRS for other regulated substances are acceptable.*

Exide Response to Comment D.4:

We concur with the 0.0001 mg/L Type 1 and 3 RRS for benzo(a)anthracene.

E. Soil and Groundwater Delineation

Delineation of regulated substances in soil and groundwater are requirements under both the Rules for Hazardous Site Response and the Voluntary Remediation Program. Groundwater delineation is needed downgradient of the former Exide property. EPD will not require soil delineation in areas that have already been addressed by USEPA response activities (e.g., residential properties south and west of the former Exide property). However, delineation of lead in soil is needed in the railroad right-of-way north of the former Exide property, as some of the highest soil lead concentrations were found near the northern property boundary and a historic sulfuric acid spill in the North Yard of the property reportedly extended "onto the adjacent lot along the railroad tracks" (see the February 2006 Compliance Status Report).

Exide Response to Comment E:

Confirmation soil samples from the planned excavations near the northern property boundary will be used to evaluate whether soil impacts requiring corrective action extend off-site. The need for off-site groundwater sampling will be further evaluated after conducting an additional sampling event from the on-site monitoring wells. The historical data indicates that the monitoring wells near the northern property boundary were close to drinking water standards when last sampled and may not warrant additional off-site delineation of groundwater impacts.

F. Site Buildings

The previous Removal Action Workplan I Corrective Action Plan (April 2008) called for decontamination and demolition of site buildings. If site buildings are to remain, Exide must still demonstrate that wastes from their operations have been removed from these buildings. This would include wastes in sumps, pipes, or other building infrastructure. If the Main Operations Building slab is removed, remediation of lead-impacted, low pH soil in the vicinity of MW-8 may be needed.

Exide Response to Comment F:

The buildings are to remain at this time. Waste material remaining in sumps, pipes, or other building infrastructure will be removed.

G. Data Quality and Presentation

- 1. All sampling data from previous investigations should be incorporated into the Corrective Action Plan. For example, the "Special Sump Soil" sample SSS-01 (240,000 mg/kg of lead) from the March 4, 2005 Sampling and Analysis Report is not discussed in the Path Forward for Remediation. As another example, soil sample C-1 (6,118.4 mg/kg of lead at 0-6 inches bgs) is not shown on the Lead Concentration Map (Figure 1).*

Exide Response to Comment G.1:

Soil sample C-1 was inadvertently omitted from the previous analysis, but has been added to the data set presented herein. The March 4, 2005 Sampling and Analysis Report indicates that "Special Sump Soil" samples were of material inside the sump, which apparently discharged to the City sewer system, and not representative of soil impacts. Therefore, the SSS-01 data was not included in the soil dataset presented herein.

- 2. Suspected source areas must be identified on a map. This would include the drain line from the Main Operations Building to the Waste Neutralization Building and areas of known acid spills, such as the acid spill in the North Yard identified in the February 2006 Compliance Status Report. More information is needed regarding the "historical acid spill" discussed in the December 2008 SPLP Sampling Report, such as whether this is referring to the North Yard spill or a different spill.*

Exide Response to Comment G.2:

The discussion included in the February 2006 CSR identified the acid fill area, charge conveyor room, curing area, oxide storage collector, machine shop, loading docks, former acid house (foundation only exists), and former waste neutralization pit as potential source areas. These areas are depicted on the figure in Attachment A. Amec Foster Wheeler's review of available files did not indicate the location of the drain line from the Main Operations Building to the Waste Neutralization Building. However, the majority of the manufacturing equipment has been

removed and the former Waste Neutralization Pit has been filled in. The extensive soil sampling data grid appears adequate to identify the primary areas of impacted soil for remediation planning purposes.

No other information regarding historical acid spills was identified; therefore, the “historical acid spill” discussed in the December 2008 SPLP Sampling Report appears to also refer to the February 1985 spill of 200 gallons of sulfuric acid that reportedly ran onto the adjacent railroad property and was neutralized using liquid caustic soda. The CSR indicates that sampling activities were performed in that area of the site by an EPA contractor in the early 1990s, although the sampling data is not included.

3. Areas where any regulated substances exceed RRS must be identified on a map.

Exide Response to Comment G.3:

The primary focus of the path forward document was to obtain general concurrence from EPD and EPA on the remediation approach for lead in soil, which is the primary driver for site remediation. Additional figures showing regulated substances will be included in the Corrective Action Plan to be prepared following general agreement of the lead remediation approach by EPD and EPA.

H. Conclusion

A Corrective Action Plan must be submitted within 60 days of USEPA concurrence that the approaches discussed in this letter would be acceptable toward meeting federal requirements. The Corrective Action Plan must include a cost estimate. If Exide elects to implement a site-specific cleanup for lead in soil other than the two options presented in Section C of this letter, provisions of the Voluntary Remediation Program would likely be necessary to meet site-specific RRS for soil. Enrollment in the Voluntary Remediation Program is contingent on the property becoming eligible for enrollment and cooperation by the current property owner. EPD recommends that Exide implement a soil cleanup that would be acceptable under the Rules for Hazardous Site Response, particularly since the Soil Type 4 RRS option is similar to Exide Option 3 and the use of area averaging to demonstrate compliance with site-specific residential RRS would still be possible if the property is entered into the Voluntary Remediation Program.

Exide prefers to take advantage of the area averaging concepts available under EPA and VRP regulatory programs, rather than the point-by-point compliance requirements under HSRA. The remediation concept presented herein have general approval from the property owner, who also appears willing to enter the property into the VRP if eligibility is obtained.

Thank you for your assistance with this project. Please do not hesitate to contact Greg Wrenn at (770) 421-3472 if you have any questions or need additional information.

Sincerely,

Amec Foster Wheeler Environment & Infrastructure, Inc.

Laura M. Smith

Laura M. Smith
Associate Scientist - Risk Assessment

Gregory J. Wrenn

Gregory J. Wrenn, P.E.
Project Manager

Attachments

cc: Matt Love - Exide Columbus



TABLES

TABLE 1
Summary of Lead Results in Surface Soils (0 to 2 feet bgs)
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)						
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers
EY1SP-04-0-6	F10	10/05/04	0	6	59000.0	
NYG-06-0-6	H4	09/28/04	0	6	53000.0	J
SYS-19-0-6	B8	09/30/04	0	6	51000.0	J
NYG-07-0-6	H4	09/28/04	0	6	39000.0	J
SYSP-05-0-6	B8	10/05/04	0	6	27000.0	
NYSED-2-0-6	H5	10/05/04	0	6	13000.0	
NYG-05-0-6	I3	09/28/04	0	6	12000.0	J
SYS-30-0-6	B3	09/30/04	0	6	11000.0	J
EY1SP-03-0-6	D14	10/05/04	0	6	7600.0	
EY2Sed-07-0-6	C21	09/29/04	0	6	7100.0	
EY2Sed-03-0-6	D18	09/29/04	0	6	7100.0	
EY2Sed-06-0-6	C21	09/29/04	0	6	6600.0	
H-6 0.0-0.5	H6	--	0	6	6287.4	
C-1 0-0.5'	C1	11/11/2005	0	6	6118.4	
C-9 0-0.5	C9	--	0	6	5987.2	
H-4 0-0.5	H4	--	0	6	5968.0	
EY1S-38-0-6	E13	10/05/04	0	6	5300.0	
EY1S-39-0-6	F12	10/05/04	0	6	5200.0	
H-3 0-0.5	H3	--	0	6	4928.0	
SYS-31-0-6	B2	09/30/04	0	6	4700.0	J
NYSED-1-0-6	H5	10/05/04	0	6	4100.0	
EY1S-37-0-6	E12	10/05/04	0	6	3600.0	
EY2Sed-02-0-6	D17	09/29/04	0	6	3500.0	
EY1SP-02-0-6	E14	10/05/04	0	6	3400.0	
D-16 0-0.5	D16	--	0	6	3337.6	
B-4 0-0.5	B4	--	0	6	3289.6	
EY1G-10-0-6	F11	09/28/04	0	6	3000.0	J
D-17 0.0-0.5	D17	--	0	6	2920.0	
EY2Sed-04-0-6	C19	09/29/04	0	6	2800.0	
MW-4 0-0.5	H5	--	0	6	2769.6	
MW-1 0-0.5	B19	--	0	6	2668.8	
E-14 0-6"	E-14	--	0	6	2588.8	
E-11 0-0.5	E11	--	0	6	2360.0	
SYS-29-0-6	B4	09/30/04	0	6	2300.0	J
EY2Sed-05-0-6	C20	09/29/04	0	6	2200.0	
EY1SP-01-0-6	E11	10/05/04	0	6	2100.0	
C-20 0-0.5	C20	--	0	6	2019.2	
C-19 0-0.5	C19	--	0	6	1960.0	
SYS-24-0-6	A6	09/30/04	0	6	1900.0	J
EY2Sed-01-0-6	D15/16	09/29/04	0	6	1800.0	
G-1 0-0.5	G1	--	0	6	1708.8	
NYG-08-0-6	H5	09/28/04	0	6	1700.0	

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A-15 0-0.5	A-15	--	0	6	1668.8	
D14 0-5.5	D14	--	0	6	1480.0	
F-12 0.0-0.5	F12	--	0	6	1360.0	
MW-2 0-0.5	E9	--	0	6	1289.6	
I-3 0-0.5	I3	--	0	6	1109.6	
EY2S-11-0-6	A18	09/29/04	0	6	1100.0	
SYS-33-0-6	A9	09/30/04	0	6	1100.0	J
EY1G-12-0-6	D11	09/28/04	0	6	1100.0	J
E-12 0-0.5	E12	--	0	6	1009.6	
C-12 0-0.5	C12	--	0	6	991.2	
A-12 0-6	A12	--	0	6	880.0	
SYS-27-0-6	B7	09/30/04	0	6	840.0	J
SYS-22-0-6	A8	09/30/04	0	6	800.0	J
B-7 0-0.5	B7	--	0	6	794.8	
SYS-18-0-6	B9	09/30/04	0	6	780.0	J
SYS-34-0-6	A7	09/30/04	0	6	770	J
SYS-28-0-6	B5/6	09/30/04	0	6	740.0	J
SYS-26-0-6	A4	09/30/04	0	6	730.0	J
EY2S-10-0-6	A16/17	09/29/04	0	6	650.0	
B-2 0-0.5'	B2	--	0	6	642.0	
A-19 0-0.5'	A-19	--	0	6	615.6	
SYS-23-0-6	A7	09/30/04	0	6	570	J
G-7 0-0.5	G7	--	0	6	562.0	
D-15 0-0.5	D15	--	0	6	543.6	
B-1 0-0.5'	B1	--	0	6	512.0	
A-13 0-0.5	A13	--	0	6	505.2	
EY2S-12-0-6	A20	09/29/04	0	6	490.0	
SYS-36-0-6	A3	09/30/04	0	6	490.0	J
SYS-21-0-6	A9	09/30/04	0	6	490.0	J
C-10 0-0.5	C10	--	0	6	454.4	
SYS-20-0-6	A10	09/30/04	0	6	430.0	J
B-21 0-0.5	B21	--	0	6	426.4	
NYG-03-0-6	I2	09/28/04	0	6	420.0	
SYS-32-0-6	A11	09/30/04	0	6	380.0	J
SYS-25-0-6	A5	09/30/04	0	6	380.0	J
EY1G-09-0-6	F10	09/28/04	0	6	370.0	J
G-3 0-0.5	G3	--	0	6	343.2	
A-2 0-0.5	A2	--	0	6	338.2	
SYS-35-0-6	A5	09/30/04	0	6	320.0	J
E-15 0-0.5	E15	--	0	6	287.8	
EY2S-15-0-6	A26	09/29/04	0	6	280.0	
SYS-17-0-6	B10	09/30/04	0	6	250.0	J

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EY2S-09-0-6	C18	09/29/04	0	6	250.0	
EY2S-13-0-6	A22	09/29/04	0	6	240.0	
I-1 0-0.5	I1	--	0	6	236.6	
C-13 0-6	C13	--	0	6	205.6	
EY2S-16-0-6	A28	09/29/04	0	6	200.0	
NYG-02-0-6	H1	09/28/04	0	6	180.0	
B-15 0-0.5	B15	--	0	6	175.5	
B-25 0-0.5	B25	--	0	6	157.3	
E-13 0-0.5	E13	--	0	6	144.1	
C-21 0-0.5	C21	--	0	6	130.8	
EY2S-08-0-6	C16	09/29/04	0	6	130.0	
B-22 0-0.5	B22	--	0	6	127.3	
B6 0-0.5	B6	--	0	6	108.3	
B-3 0-0.5	B3	--	0	6	101.6	
B-17 0-0.5	B17	--	0	6	101.0	
G-4 0-0.5'	G4	--	0	6	87.4	
C-17 0-0.5	C17	--	0	6	85.9	
D13 0-0.5	D13	--	0	6	79.8	
E-6 0-0.5	E6	--	0	6	79.6	
B-24 0-0.5	B24	11/08/05	0	6	77.0	
NYG-01-0-6	I1	09/28/04	0	6	75.0	J
EY2S-14-0-6	A24	09/29/04	0	6	62.0	
D-6 0-6"	D6	11/10/05	0	6	61.0	
F-10 0-0.5'	F10	11/09/05	0	6	47.0	
C-15 0-0.5'	C15	11/09/05	0	6	46.0	
E-10 0-0.5	E10	--	0	6	41.3	
EY1G-11-0-6	D9	09/28/04	0	6	40.0	J
EY1G-15-0-6	A14/B14	09/28/04	0	6	39.0	J
B-11 0-0.5'	B11	11/09/05	0	6	37.0	
B-13 0-0.5'	B13	11/09/05	0	6	33.0	
E-5 0-0.5	E5	--	0	6	31.1	
I-2 0-0.5	I2	--	0	6	26.1	
D-12 0-0.5	D12	--	0	6	23.1	U
B-23 0-6"	B23	11/08/05	0	6	23.0	
G-9 0-0.5'	G9	11/09/05	0	6	23.0	
NYG-04-0-6	H2	09/28/04	0	6	22.0	J
A-18 0-0.5'	A18	11/09/05	0	6	21.0	
D-10 0-6"	D10	11/10/05	0	6	20.0	
F-9 0-0.5'	F9	11/09/05	0	6	19.0	
EY1G-14-0-6	B11	09/28/04	0	6	18.0	J
C-4 0-0.5	C4	--	0	6	17.9	
C-11 0-0.5'	C11	11/09/05	0	6	17.0	

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A-4 0-6"	A4	11/11/05	0	6	16.0	
H-2 0-0.5'	H2	11/11/05	0	6	16.0	
EY1G-13-0-6	D13	09/28/04	0	6	13.0	J
D-9 0-0.5'	D9	11/09/05	0	6	9.8	
MW-3 0-6"	A1	11/08/05	0	6	9.5	
B-8 0-1'	B8	11/11/05	0	12	290.0	
C-14 0-1'	C14	11/09/05	0	12	62.0	
E-3 0-1'	E3	11/10/05	0	12	37.0	
H-1 0-1'	H1	11/11/05	0	12	26.0	
F-3 0-1'	F3	11/10/05	0	12	24.0	
E-2 0-1'	E2	11/10/05	0	12	19.0	
F-5 0-1'	F5	11/10/05	0	12	18.0	
C-5 0-1'	C5	11/10/05	0	12	16.0	
F-2 0-1'	F2	11/10/05	0	12	16.0	
D-5 0-1'	D5	11/10/05	0	12	15.0	
E-4 0-1'	E4	11/10/05	0	12	14.0	
F-4 0-1'	F4	11/10/05	0	12	13.0	
D-3 0-1'	D3	11/10/05	0	12	12.0	
D-4 0-1'	D4	11/10/05	0	12	12.0	
C-3 0-1'	C3	11/10/05	0	12	4.2	
MW9-0-2	NA	09/01/10	0	24	4060.0	
MW4R-0-2	NA	09/01/10	0	24	471.0	
MW5-0-2	NA	09/01/10	0	24	244.0	
NYG-07-6-12	H4	09/28/04	6	12	23000.0	
NYG-05-6-12	I3	09/28/04	6	12	17000.0	
EY2Sed-07-6-12	C21	09/29/04	6	12	12000.0	
H-3 0.5-1	H3	--	6	12	10099.2	
EY2Sed-06-6-12	C21	09/29/04	6	12	9800.0	
E-12 0.5-1	E12	--	6	12	8889.6	
EY2Sed-05-6-12	C20	09/29/04	6	12	8200.0	
NYSED-1-6-12	H5	10/05/04	6	12	5500.0	
SYS-19-6-12	B8	09/30/04	6	12	5400.0	
EY1S-38-6-12	E13	10/05/04	6	12	5400.0	
EY1SP-02-6-12	E14	10/05/04	6	12	5200.0	
EY2Sed-04-6-12	C19	09/29/04	6	12	4000.0	
NYG-06-6-12	H4	09/28/04	6	12	3600.0	
D-16 0.5-1	D16	--	6	12	3497.6	
MW-1 0.5-1	B19	--	6	12	3240.0	
EY2Sed-01-6-12	D15/16	09/29/04	6	12	3200.0	
EY1SP-03-6-12	D14	10/05/04	6	12	3100.0	
EY2S-11-6-12	A18	09/29/04	6	12	2900.0	
C-20 0.5-1	C20	--	6	12	2640.0	

TABLE 1
Summary of Lead Results in Surface Soils (0 to 2 feet bgs)
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)						
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers
E-11 0.5-1	E11	--	6	12	2089.6	
D13 0.5-1	D13	--	6	12	1960.0	
EY2Sed-02-6-12	D17	09/29/04	6	12	1700.0	
C-19 0.5-1	C19	--	6	12	1659.2	
EY1SP-01-6-12	E11	10/05/04	6	12	1600.0	
A-15 0.5-1	A-15	--	6	12	1460.0	
EY1S-37-6-12	E12	10/05/04	6	12	1300.0	
G-7 0.5-1	G7	--	6	12	1169.6	
C-9 0.5-1	C9	--	6	12	1129.6	
MW-4 0.5-1	H5	--	6	12	1129.6	
EY2S-10-6-12	A16/17	09/29/04	6	12	900.0	
D-12 0.5-1	D12	--	6	12	898.4	
SYSP-05-6-12-	B8	10/05/04	6	12	880.0	
G-1 0.5-1	G1	--	6	12	833.6	
EY1S-39-6-12	F12	10/05/04	6	12	700.0	
B-4 0.5-1	B4	--	6	12	571.2	
D14 0.5-1	D14	--	6	12	514.4	
C-1 0.5-1'	C1	11/11/2005	6	12	513.2	
EY1G-10-6-12	F11	09/28/04	6	12	450.0	
SYS-24-6-12	A6	09/30/04	6	12	430.0	
B-1 0.5-1	B1	--	6	12	412.8	
G-3 0.5-1	G3	--	6	12	369.4	
I-1 0.5-1	I1	--	6	12	364.0	
SYS-27-6-12	B7	09/30/04	6	12	350.0	J
H-4 0.5-1	H4	--	6	12	349.4	
SYS-31-6-12	B2	09/30/04	6	12	340.0	J
B-2 0.5-1'	B2	--	6	12	254.0	
SYS-29-6-12	B4	09/30/04	6	12	250.0	J
B-7 0.5-1	B7	--	6	12	227.6	
SYS-32-6-12	A11	09/30/04	6	12	220.0	J
SYS-30-6-12	B3	09/30/04	6	12	220.0	J
SYS-28-6-12	B5/6	09/30/04	6	12	210.0	J
D-17 0.5-1.0	D17	--	6	12	206.6	
A-2 0.5-1	A2	--	6	12	181.8	
MW-2 0.5-1	E9	--	6	12	179.7	
F-12 0.5-1.0	F12	--	6	12	177.9	
B-21 0.5-1	B21	--	6	12	176.1	
B-6 0.5-1	B6	--	6	12	165.7	
B-15 0.5-1	B15	--	6	12	162.5	
EY2S-13-6-12	A22	09/29/04	6	12	160.0	
EY1G-13-6-12	D13	09/28/04	6	12	150.0	
SYS-33-6-12	A9	09/30/04	6	12	140.0	J

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SURFACE SOILS (0 - 2 FEET BGS)						
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers
E-13 0.5-1	E13	--	6	12	132.2	
SYS-36-6-12	A3	09/30/04	6	12	130.0	J
I-3 0.5-1	I3	--	6	12	103.7	
E-14 6-12"	E-14	--	6	12	100.7	
EY2S-12-6-12	A20	09/29/04	6	12	98.0	
E-15 0.5-1	E15	--	6	12	94.3	
SYS-34-6-12	A7	09/30/04	6	12	94.0	J
C-21 0.5-1	C21	--	6	12	92.9	
EY2S-09-6-12	C18	09/29/04	6	12	90.0	
H-6 0.5-1.0	H6	--	6	12	86.5	
C-10 0.5-1'	C10	11/09/05	6	12	86.0	
NYG-08-6-12	H5	09/28/04	6	12	81.0	
EY2S-15-6-12	A26	09/29/04	6	12	78.0	
EY1G-14-6-12	B11	09/28/04	6	12	76.0	
G-4 0.5-1	G4	--	6	12	75.6	
SYS-23-6-12	A7	09/30/04	6	12	73.0	
C-12 0.5-1'	C12	11/09/05	6	12	72.0	
E-10 0.5-1	E10	--	6	12	66.0	
EY1G-15-6-12	A14/B14	09/28/04	6	12	61.0	
B-3 0.5-1	B3	--	6	12	58.9	
EY2S-16-6-12	A28	09/29/04	6	12	57.0	
C-17 0.5-1	C17	--	6	12	51.3	
SYS-20-6-12	A10	09/30/04	6	12	51.0	
SYS-35-6-12	A5	09/30/04	6	12	51.0	J
SYS-17-6-12	B10	09/30/04	6	12	49.0	
B-8 0.5-1	B8	--	6	12	46.2	
SYS-25-6-12	A5	09/30/04	6	12	46.0	
F-10 0.5-1	F10	--	6	12	44.0	
SYS-18-6-12	B9	09/30/04	6	12	44.0	
SYS-22-6-12	A8	09/30/04	6	12	43.0	
D-6 6-12	D6	--	6	12	42.7	
D-15 0.5-1'	D15	11/09/05	6	12	41.0	
G-9 0.5-1	G9	--	6	12	40.9	
B-24 0.5-1	B24	--	6	12	40.2	
B-17 0.5-1'	B17	11/09/05	6	12	40.0	
B-22 0.5-1'	B22	11/08/05	6	12	39.0	
EY2S-08-6-12	C16	09/29/04	6	12	39.0	
E-6 0.5-1	E6	--	6	12	38.0	
B-25 0.5-1'	B25	11/08/05	6	12	38.0	
A-12 6"-12"	A12	11/09/05	6	12	37.0	
C-15 0.5-1	C-15	--	6	12	36.8	
H-1 0.5-1	H1	--	6	12	36.5	

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Summary of Lead Results in Surface Soils (0 to 2 feet bgs)
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)						
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers
SYS-26-6-12	A4	09/30/04	6	12	36.0	
E-3 0.5-1	E3	--	6	12	34.4	
EY2S-14-6-12	A24	09/29/04	6	12	34.0	
SYS-21-6-12	A9	09/30/04	6	12	34.0	
D-4 0.5-1	D4	--	6	12	33.3	
A-13 0.5-1'	A13	11/09/05	6	12	33.0	
C-11 0.5-1	C11	--	6	12	31.0	
EY1G-09-6-12	F10	09/28/04	6	12	31.0	
F-2 0.5-1	F2	--	6	12	30.1	
B-23 0.5-1	B23	--	6	12	30.0	U
E-2 0.5-1	E2	--	6	12	29.2	
C-5 0.5-1	C5	--	6	12	28.9	
H-2 0.5-1	H2	--	6	12	28.3	
A-4 6-12	A4	--	6	12	25.9	
E-5 0.5-1	E5	--	6	12	25.7	
I-2 0.5-1	I2	--	6	12	24.0	U
EY1G-12-6-12	D11	09/28/04	6	12	24.0	
MW-3 6-12"	A1	--	6	12	23.4	U
EY1G-11-6-12	D9	09/28/04	6	12	23.0	
NYG-03-6-12	I2	09/28/04	6	12	23.0	
A-18 0.5-1	A18	--	6	12	22.6	
C-14 0.5-1	C-14	--	6	12	22.0	
NYG-02-6-12	H1	09/28/04	6	12	22.0	
F-9 0.5-1	F9	--	6	12	21.8	
F-4 0.5-1	F4	--	6	12	21.0	U
D-5 0.5-1	D5	--	6	12	19.9	
B-13 0.5-1	B13	--	6	12	19.7	U
D-9 0.5-1	D9	--	6	12	19.1	U
D-3 0.5-1	D3	--	6	12	18.3	U
C-4 0.5-1	C4	--	6	12	17.3	U
E-4 0.5-1	E4	--	6	12	17.3	U
F-5 0.5-1	F5	--	6	12	17.1	U
NYG-01-6-12	I1	09/28/04	6	12	17.0	
B-11 0.5-1	B11	--	6	12	16.1	U
C-13 6"-12"	C13	11/09/05	6	12	16.0	
D-10 6-12	D10	--	6	12	15.5	U
A-19 0.5-1'	A19	11/09/05	6	12	13.0	
F-3 0.5-1	F3	--	6	12	12.5	U
NYG-04-6-12	H2	09/28/04	6	12	11.0	
D-16 1-1.5	D16	--	12	18	2169.6	
H-6 1.0-1.5'	H6	11/12/05	12	18	300.0	
D-17 1.0-1.5	D17	--	12	18	283.2	

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Summary of Lead Results in Surface Soils (0 to 2 feet bgs)
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)						
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers
E-15 1-1.5	E15	--	12	18	153.1	
E-14 1.0-1.5'	E14	11/12/05	12	18	63.0	
F-12 1.0-1.5	F12	--	12	18	52.5	
NYSED-1-12-24	H5	10/05/04	12	24	29000.0	
EY1S-38-12-24	E13	10/05/04	12	24	6900.0	
EY1SP-03-12-24	D14	10/05/04	12	24	5100.0	
EY2Sed-07-12-24	C21	09/29/04	12	24	4600.0	
EY1SP-02-12-24	E14	10/05/04	12	24	3400.0	
D14 1-2	D14	--	12	24	3347.2	
EY2Sed-01-12-24	D15/16	09/29/04	12	24	3300.0	
C-19 1-2	C19	--	12	24	3240.0	
MW-1 1-2	B19	--	12	24	3228.8	
SYSP-05-12-24	B8	10/05/04	12	24	3200.0	
H-3 1-2	H3	--	12	24	3179.2	
NYG-05-12-24	I3	09/28/04	12	24	3100.0	
EY2Sed-06-12-24	C21	09/29/04	12	24	2600.0	
EY2Sed-05-12-24	C20	09/29/04	12	24	2100.0	
E-11 1-2	E11	--	12	24	1969.6	
EY2Sed-04-12-24	C19	09/29/04	12	24	1900.0	
SYS-30-12-24	B3	09/30/04	12	24	1500.0	J
EY1S-37-12-24	E12	10/05/04	12	24	1500.0	
MW-4 1-2	H5	--	12	24	1209.6	
EY1SP-01-12-24	E11	10/05/04	12	24	1200.0	
C-20 1-2	C20	--	12	24	916.8	
D13 1-2	D13	--	12	24	893.6	
EY1G-13-12-24	D13	09/28/04	12	24	850.0	
B-7 1-2	B7	--	12	24	794.8	
SYS-19-12-24	B8	09/30/04	12	24	730.0	
EY2Sed-02-12-24	D17	09/29/04	12	24	570.0	
B-4 1-2	B4	--	12	24	555.2	
A-15 1-2	A-15	--	12	24	540.0	
E-6 1-2'	E6	--	12	24	532.4	
SYS-31-12-24	B2	09/30/04	12	24	490.0	J
B-3 1-2	B3	--	12	24	377.6	
E-12 1-2	E12	--	12	24	350.0	
C-1 1-2'	C1	11/11/2005	12	24	279.4	
SYS-27-12-24	B7	09/30/04	12	24	260.0	J
SYS-24-12-24	A6	09/30/04	12	24	250.0	
SYS-29-12-24	B4	09/30/04	12	24	230.0	J
NYG-07-12-24	H4	09/28/04	12	24	230.0	
G-1 1-2	G1	--	12	24	197.0	
EY2S-10-12-24	A16/17	09/29/04	12	24	180.0	

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SURFACE SOILS (0 - 2 FEET BGS)						
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg) ^(a)	Qualifiers
B-1 1-2'	B1	--	12	24	163.4	
EY2S-11-12-24	A18	09/29/04	12	24	160.0	
EY2S-12-12-24	A20	09/29/04	12	24	160.0	
NYG-06-12-24	H4	09/28/04	12	24	160.0	
SYS-34-12-24	A7	09/30/04	12	24	140.0	J
EY2S-13-12-24	A22	09/29/04	12	24	130.0	
B-2 1-2'	B2	--	12	24	128.9	
G-3 1-2	G3	--	12	24	125.2	
E-10 1-2	E10	--	12	24	124.4	
SYS-23-12-24	A7	09/30/04	12	24	120.0	
SYS-22-12-16	A8	09/30/04	12	24	120.0	
SYS-18-12-24	B9	09/30/04	12	24	120.0	
EY1S-39-12-24	F12	10/05/04	12	24	120.0	
H-4 1-2	H4	--	12	24	118.4	
B-21 1-2	B21	--	12	24	116.3	
SYS-33-12-24	A9	09/30/04	12	24	100.0	J
SYS-17-12-24	B10	09/30/04	12	24	100.0	
D-15	D15	--	12	24	97.1	
B-6 1-2	B6	--	12	24	91.2	
MW-2 1-2	E9	--	12	24	82.0	
I-3 1-2	I3	--	12	24	77.3	
SYS-26-12-24	A4	09/30/04	12	24	73.0	
SYS-21-12-24	A9	09/30/04	12	24	65.0	
C-10 1-2	C10	--	12	24	63.2	
B-22 1-2	B22	--	12	24	59.7	
SYS-20-12-24	A10	09/30/04	12	24	58.0	
E-13 1-2	E13	--	12	24	56.7	
SYS-25-12-24	A5	09/30/04	12	24	54.0	
SYS-36-12-24	A3	09/30/04	12	24	53.0	J
EY2S-09-12-24	C18	09/29/04	12	24	52.0	
G-4 1-2'	G4	--	12	24	51.6	
SYS-35-12-24	A5	09/30/04	12	24	49.0	J
A-12 12-24	A12	--	12	24	42.8	
B-17 1-2	B17	--	12	24	42.5	
C-17 1-2'	C17	11/09/05	12	24	41.0	
SYS-32-12-24	A11	09/30/04	12	24	40.0	J
D-4 1-2	D4	--	12	24	39.6	
NYG-08-12-24	H5	09/28/04	12	24	39.0	
A-13 1-2	A13	--	12	24	36.3	
D-12 1-2'	D12	11/09/05	12	24	36.0	
H-1 1-2	H1	--	12	24	35.6	
D-15	D15	--	12	24	35.3	

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SURFACE SOILS (0 - 2 FEET BGS)						
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers
MW-3 12-24"	A1	--	12	24	35.3	U
EY2S-15-12-24	A26	09/29/04	12	24	34.0	
B-23 1-2	B23	--	12	24	33.5	U
C-14 1-2	C-14	--	12	24	33.3	
EY1G-12-12-24	D11	09/28/04	12	24	33.0	
B-24 1-2	B24	--	12	24	32.1	
C-21 1-2'	C21	11/09/05	12	24	32.0	
B-8 1-2	B8	--	12	24	31.9	
H-2 1-2	H2	--	12	24	30.6	
C-9 1-2	C9	--	12	24	30.0	
B-13 1-2	B13	--	12	24	29.3	
A-18 1-2	A18	--	12	24	29.2	
F-2 1-2	F2	--	12	24	29.1	
C-12 1-2	C12	--	12	24	28.8	
D-6 12-24	D6	--	12	24	28.6	
A-4 12-24	A4	--	12	24	28.4	
C-11 1-2	C11	--	12	24	28.2	
EY1G-15-12-24	A14/B14	09/28/04	12	24	28.0	
EY2S-08-12-24	C16	09/29/04	12	24	28.0	
A-2 1-2'	A2	11/11/05	12	24	27.0	
I-1 1-2'	I1	11/11/05	12	24	27.0	
E-4 1-2	E4	--	12	24	26.6	
NYG-03-12-24	I2	09/28/04	12	24	26.0	
F-5 1-2	F5	--	12	24	25.8	
D-9 1-2	D9	--	12	24	25.6	

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SURFACE SOILS (0 - 2 FEET BGS)						
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers
F-9 1-2	F9	--	12	24	23.8	
NYG-01-12-24	I1	09/28/04	12	24	23.0	
I-2 1-2'	I2	11/11/05	12	24	22.0	
C-13 12-24	C13	--	12	24	21.9	
C-5 1-2	C5	--	12	24	21.8	
G-9 1-2	G9	--	12	24	21.3	U
C-15 1-2	C-15	--	12	24	21.2	U
EY2S-14-12-24	A24	09/29/04	12	24	21.0	
NYG-02-12-24	H1	09/28/04	12	24	21.0	
D-10 12-24	D10	--	12	24	20.3	
F-10 1-2	F10	--	12	24	20.1	U
B-15 1-2'	B15	11/09/05	12	24	20.0	
C-3 1-2	C3	--	12	24	19.5	
E-5 1-2'	E5	11/10/05	12	24	19.0	
EY1G-09-12-24	F10	09/28/04	12	24	19.0	
E-3 1-2	E3	--	12	24	18.3	
G-7 1-2'	G7	11/10/05	12	24	18.0	
A-19 1-2	A-19	--	12	24	17.3	U
F-3 1-2	F3	--	12	24	17.2	
F-4 1-2	F4	--	12	24	17.2	
EY1G-14-12-24	B11	09/28/04	12	24	17.0	
D-5 1-2	D5	--	12	24	17.0	U
B-11 1-2	B11	--	12	24	16.7	U
B-25 1-2	B25	--	12	24	16.1	U
D-3 1-2'	D3	--	12	24	15.2	U
NYG-04-12-24	H2	09/28/04	12	24	15.0	
EY1G11-12-24	D9	09/28/04	12	24	14.0	
EY1G-10-12-24	F11	09/28/04	12	24	14.0	
C-4 1-2'	C4	11/10/05	12	24	9.9	
D-16 1.5-2	D16	--	18	24	1049.6	
F-12 1.5-2.0	F12	--	18	24	353.2	
D-17 1.5-2.0	D17	--	18	24	275.0	
H-6 1.5-2.0	H6	--	18	24	48.6	
E-14 18-24"	E-14	--	18	24	36.2	

Notes:

(a) Samples in bold exceed the Type 4 RRS of 930 mg/kg in the 0-12 inch soil interval.

in. bgs = inches below ground surface

mg/kg = milligrams per kilogram

J = Result is estimated.

U = Result was not detected above the indicated reporting limit.

Prepared By/Date: MKB 12/29/14

Checked by/Date: SAG 12/30/14

TABLE 2
Average Residual Lead Results in Surface Soils (0 to 2 feet bgs) after Spot Removal
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)							
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers	Value used in Mean Lead Calculation (mg/kg)^(b)
A-12 0-6	A12	--	0	6	880		880
SYS-27-0-6	B7	09/30/04	0	6	840	J	840
SYS-22-0-6	A8	09/30/04	0	6	800	J	800
B-7 0-0.5	B7	--	0	6	795		795
SYS-18-0-6	B9	09/30/04	0	6	780	J	780
SYS-34-0-6	A7	09/30/04	0	6	770	J	770
SYS-28-0-6	B5/6	09/30/04	0	6	740	J	740
SYS-26-0-6	A4	09/30/04	0	6	730	J	730
EY2S-10-0-6	A16/17	09/29/04	0	6	650		650
B-2 0-0.5'	B2	--	0	6	642		642
A-19 0-0.5'	A-19	--	0	6	616		616
SYS-23-0-6	A7	09/30/04	0	6	570	J	570
G-7 0-0.5	G7	--	0	6	562		562
D-15 0-0.5	D15	--	0	6	544		544
B-1 0-0.5'	B1	--	0	6	512		512
A-13 0-0.5	A13	--	0	6	505		505
EY2S-12-0-6	A20	09/29/04	0	6	490		490
SYS-36-0-6	A3	09/30/04	0	6	490	J	490
SYS-21-0-6	A9	09/30/04	0	6	490	J	490
C-10 0-0.5	C10	--	0	6	454		454
SYS-20-0-6	A10	09/30/04	0	6	430	J	430
B-21 0-0.5	B21	--	0	6	426		426
NYG-03-0-6	I2	09/28/04	0	6	420		420
SYS-32-0-6	A11	09/30/04	0	6	380	J	380
SYS-25-0-6	A5	09/30/04	0	6	380	J	380
EY1G-09-0-6	F10	09/28/04	0	6	370	J	370
G-3 0-0.5	G3	--	0	6	343		343
A-2 0-0.5	A2	--	0	6	338		338
SYS-35-0-6	A5	09/30/04	0	6	320	J	320
E-15 0-0.5	E15	--	0	6	288		288
EY2S-15-0-6	A26	09/29/04	0	6	280		280
SYS-17-0-6	B10	09/30/04	0	6	250	J	250
EY2S-09-0-6	C18	09/29/04	0	6	250		250
EY2S-13-0-6	A22	09/29/04	0	6	240		240
I-1 0-0.5	I1	--	0	6	237		237

TABLE 2
Average Residual Lead Results in Surface Soils (0 to 2 feet bgs) after Spot Removal
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)							
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers	Value used in Mean Lead Calculation (mg/kg)^(b)
C-13 0-6	C13	--	0	6	206		206
EY2S-16-0-6	A28	09/29/04	0	6	200		200
NYG-02-0-6	H1	09/28/04	0	6	180		180
B-15 0-0.5	B15	--	0	6	176		176
B-25 0-0.5	B25	--	0	6	157		157
E-13 0-0.5	E13	--	0	6	144		144
C-21 0-0.5	C21	--	0	6	131		131
EY2S-08-0-6	C16	09/29/04	0	6	130		130
B-22 0-0.5	B22	--	0	6	127		127
B6 0.0.5	B6	--	0	6	108		108
B-3 0-0.5	B3	--	0	6	102		102
B-17 0-0.5	B17	--	0	6	101		101
G-4 0-0.5'	G4	--	0	6	87		87
C-17 0-0.5	C17	--	0	6	86		86
D13 0-0.5	D13	--	0	6	80		80
E-6 0-0.5	E6	--	0	6	80		80
B-24 0-0.5	B24	11/08/05	0	6	77		77
NYG-01-0-6	I1	09/28/04	0	6	75	J	75
EY2S-14-0-6	A24	09/29/04	0	6	62		62
D-6 0-6"	D6	11/10/05	0	6	61		61
F-10 0-0.5'	F10	11/09/05	0	6	47		47
C-15 0-0.5'	C15	11/09/05	0	6	46		46
E-10 0-0.5	E10	--	0	6	41		41
EY1G-11-0-6	D9	09/28/04	0	6	40	J	40
EY1G-15-0-6	A14/B14	09/28/04	0	6	39	J	39
B-11 0-0.5'	B11	11/09/05	0	6	37		37
B-13 0-0.5'	B13	11/09/05	0	6	33		33
E-5 0-0.5	E5	--	0	6	31		31
I-2 0-0.5	I2	--	0	6	26		26
D-12 0-0.5	D12	--	0	6	23	U	12
B-23 0-6"	B23	11/08/05	0	6	23		23
G-9 0-0.5'	G9	11/09/05	0	6	23		23
NYG-04-0-6	H2	09/28/04	0	6	22	J	22
A-18 0-0.5'	A18	11/09/05	0	6	21		21
D-10 0-6"	D10	11/10/05	0	6	20		20

TABLE 2
Average Residual Lead Results in Surface Soils (0 to 2 feet bgs) after Spot Removal
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)							
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers	Value used in Mean Lead Calculation (mg/kg)^(b)
F-9 0-0.5'	F9	11/09/05	0	6	19		19
EY1G-14-0-6	B11	09/28/04	0	6	18	J	18
C-4 0-0.5	C4	--	0	6	18		18
C-11 0-0.5'	C11	11/09/05	0	6	17		17
A-4 0-6"	A4	11/11/05	0	6	16		16
H-2 0-0.5'	H2	11/11/05	0	6	16		16
EY1G-13-0-6	D13	09/28/04	0	6	13	J	13
D-9 0-0.5'	D9	11/09/05	0	6	10		10
MW-3 0-6"	A1	11/08/05	0	6	10		10
B-8 0-1'	B8	11/11/05	0	12	290		290
C-14 0-1'	C14	11/09/05	0	12	62		62
E-3 0-1'	E3	11/10/05	0	12	37		37
H-1 0-1'	H1	11/11/05	0	12	26		26
F-3 0-1'	F3	11/10/05	0	12	24		24
E-2 0-1'	E2	11/10/05	0	12	19		19
F-5 0-1'	F5	11/10/05	0	12	18		18
C-5 0-1'	C5	11/10/05	0	12	16		16
F-2 0-1'	F2	11/10/05	0	12	16		16
D-5 0-1'	D5	11/10/05	0	12	15		15
E-4 0-1'	E4	11/10/05	0	12	14		14
F-4 0-1'	F4	11/10/05	0	12	13		13
D-3 0-1'	D3	11/10/05	0	12	12		12
D-4 0-1'	D4	11/10/05	0	12	12		12
C-3 0-1'	C3	11/10/05	0	12	4		4
MW4R-0-2	NA	09/01/10	0	24	471		471
MW5-0-2	NA	09/01/10	0	24	244		244
EY2S-10-6-12	A16/17	09/29/04	6	12	900		900
D-12 0.5-1	D12	--	6	12	898		898
SYSP-05-6-12-	B8	10/05/04	6	12	880		880
G-1 0.5-1	G1	--	6	12	834		834
EY1S-39-6-12	F12	10/05/04	6	12	700		700
B-4 0.5-1	B4	--	6	12	571		571
D14 0.5-1	D14	--	6	12	514		514
C-1 0.5-1'	C1	11/11/2005	6	12	513		513
EY1G-10-6-12	F11	09/28/04	6	12	450		450

TABLE 2
Average Residual Lead Results in Surface Soils (0 to 2 feet bgs) after Spot Removal
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)							
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers	Value used in Mean Lead Calculation (mg/kg)^(b)
SYS-24-6-12	A6	09/30/04	6	12	430		430
B-1 0.5-1	B1	--	6	12	413		413
G-3 0.5-1	G3	--	6	12	369		369
I-1 0.5-1	I1	--	6	12	364		364
SYS-27-6-12	B7	09/30/04	6	12	350	J	350
H-4 0.5-1	H4	--	6	12	349		349
SYS-31-6-12	B2	09/30/04	6	12	340	J	340
B-2 0.5-1'	B2	--	6	12	254		254
SYS-29-6-12	B4	09/30/04	6	12	250	J	250
B-7 0.5-1	B7	--	6	12	228		228
SYS-32-6-12	A11	09/30/04	6	12	220	J	220
SYS-30-6-12	B3	09/30/04	6	12	220	J	220
SYS-28-6-12	B5/6	09/30/04	6	12	210	J	210
D-17 0.5-1.0	D17	--	6	12	207		207
A-2 0.5-1	A2	--	6	12	182		182
MW-2 0.5-1	E9	--	6	12	180		180
F-12 0.5-1.0	F12	--	6	12	178		178
B-21 0.5-1	B21	--	6	12	176		176
B-6 0.5-1	B6	--	6	12	166		166
B-15 0.5-1	B15	--	6	12	163		163
EY2S-13-6-12	A22	09/29/04	6	12	160		160
EY1G-13-6-12	D13	09/28/04	6	12	150		150
SYS-33-6-12	A9	09/30/04	6	12	140	J	140
E-13 0.5-1	E13	--	6	12	132		132
SYS-36-6-12	A3	09/30/04	6	12	130	J	130
I-3 0.5-1	I3	--	6	12	104		104
E-14 6-12"	E-14	--	6	12	101		101
EY2S-12-6-12	A20	09/29/04	6	12	98		98
E-15 0.5-1	E15	--	6	12	94		94
SYS-34-6-12	A7	09/30/04	6	12	94	J	94
C-21 0.5-1	C21	--	6	12	93		93
EY2S-09-6-12	C18	09/29/04	6	12	90		90
H-6 0.5-1.0	H6	--	6	12	87		87
C-10 0.5-1'	C10	11/09/05	6	12	86		86
NYG-08-6-12	H5	09/28/04	6	12	81		81

TABLE 2
Average Residual Lead Results in Surface Soils (0 to 2 feet bgs) after Spot Removal
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)							
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers	Value used in Mean Lead Calculation (mg/kg)^(b)
EY2S-15-6-12	A26	09/29/04	6	12	78		78
EY1G-14-6-12	B11	09/28/04	6	12	76		76
G-4 0.5-1	G4	--	6	12	76		76
SYS-23-6-12	A7	09/30/04	6	12	73		73
C-12 0.5-1'	C12	11/09/05	6	12	72		72
E-10 0.5-1	E10	--	6	12	66		66
EY1G-15-6-12	A14/B14	09/28/04	6	12	61		61
B-3 0.5-1	B3	--	6	12	59		59
EY2S-16-6-12	A28	09/29/04	6	12	57		57
C-17 0.5-1	C17	--	6	12	51		51
SYS-20-6-12	A10	09/30/04	6	12	51		51
SYS-35-6-12	A5	09/30/04	6	12	51	J	51
SYS-17-6-12	B10	09/30/04	6	12	49		49
B-8 0.5-1	B8	--	6	12	46		46
SYS-25-6-12	A5	09/30/04	6	12	46		46
F-10 0.5-1	F10	--	6	12	44		44
SYS-18-6-12	B9	09/30/04	6	12	44		44
SYS-22-6-12	A8	09/30/04	6	12	43		43
D-6 6-12	D6	--	6	12	43		43
D-15 0.5-1'	D15	11/09/05	6	12	41		41
G-9 0.5-1	G9	--	6	12	41		41
B-24 0.5-1	B24	--	6	12	40		40
B-17 0.5-1'	B17	11/09/05	6	12	40		40
B-22 0.5-1'	B22	11/08/05	6	12	39		39
EY2S-08-6-12	C16	09/29/04	6	12	39		39
E-6 0.5-1	E6	--	6	12	38		38
B-25 0.5-1'	B25	11/08/05	6	12	38		38
A-12 6"-12"	A12	11/09/05	6	12	37		37
C-15 0.5-1	C-15	--	6	12	37		37
H-1 0.5-1	H1	--	6	12	37		37
SYS-26-6-12	A4	09/30/04	6	12	36		36
E-3 0.5-1	E3	--	6	12	34		34
EY2S-14-6-12	A24	09/29/04	6	12	34		34
SYS-21-6-12	A9	09/30/04	6	12	34		34
D-4 0.5-1	D4	--	6	12	33		33

TABLE 2
Average Residual Lead Results in Surface Soils (0 to 2 feet bgs) after Spot Removal
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)							
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers	Value used in Mean Lead Calculation (mg/kg)^(b)
A-13 0.5-1'	A13	11/09/05	6	12	33		33
C-11 0.5-1	C11	--	6	12	31		31
EY1G-09-6-12	F10	09/28/04	6	12	31		31
F-2 0.5-1	F2	--	6	12	30		30
B-23 0.5-1	B23	--	6	12	30	U	15
E-2 0.5-1	E2	--	6	12	29		29
C-5 0.5-1	C5	--	6	12	29		29
H-2 0.5-1	H2	--	6	12	28		28
A-4 6-12	A4	--	6	12	26		26
E-5 0.5-1	E5	--	6	12	26		26
I-2 0.5-1	I2	--	6	12	24	U	12
EY1G-12-6-12	D11	09/28/04	6	12	24		24
MW-3 6-12"	A1	--	6	12	23	U	12
EY1G-11-6-12	D9	09/28/04	6	12	23		23
NYG-03-6-12	I2	09/28/04	6	12	23		23
A-18 0.5-1	A18	--	6	12	23		23
C-14 0.5-1	C-14	--	6	12	22		22
NYG-02-6-12	H1	09/28/04	6	12	22		22
F-9 0.5-1	F9	--	6	12	22		22
F-4 0.5-1	F4	--	6	12	21	U	11
D-5 0.5-1	D5	--	6	12	20		20
B-13 0.5-1	B13	--	6	12	20	U	10
D-9 0.5-1	D9	--	6	12	19	U	10
D-3 0.5-1	D3	--	6	12	18	U	9
C-4 0.5-1	C4	--	6	12	17	U	9
E-4 0.5-1	E4	--	6	12	17	U	9
F-5 0.5-1	F5	--	6	12	17	U	9
NYG-01-6-12	I1	09/28/04	6	12	17		17
B-11 0.5-1	B11	--	6	12	16	U	8
C-13 6"-12"	C13	11/09/05	6	12	16		16
D-10 6-12	D10	--	6	12	15	U	8
A-19 0.5-1'	A19	11/09/05	6	12	13		13
F-3 0.5-1	F3	--	6	12	12	U	6
NYG-04-6-12	H2	09/28/04	6	12	11		11
D-16 1-1.5	D16	--	12	18	2170		2170

TABLE 2
Average Residual Lead Results in Surface Soils (0 to 2 feet bgs) after Spot Removal
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)							
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers	Value used in Mean Lead Calculation (mg/kg)^(b)
H-6 1.0-1.5'	H6	11/12/05	12	18	300		300
D-17 1.0-1.5	D17	--	12	18	283		283
E-15 1-1.5	E15	--	12	18	153		153
E-14 1.0-1.5'	E14	11/12/05	12	18	63		63
F-12 1.0-1.5	F12	--	12	18	53		53
EY1SP-02-12-24	E14	10/05/04	12	24	3400		3400
D14 1-2	D14	--	12	24	3347		3347
EY2Sed-01-12-24	D15/16	09/29/04	12	24	3300		3300
C-19 1-2	C19	--	12	24	3240		3240
MW-1 1-2	B19	--	12	24	3229		3229
SYSP-05-12-24	B8	10/05/04	12	24	3200		3200
H-3 1-2	H3	--	12	24	3179		3179
NYG-05-12-24	I3	09/28/04	12	24	3100		3100
EY2Sed-06-12-24	C21	09/29/04	12	24	2600		2600
EY2Sed-05-12-24	C20	09/29/04	12	24	2100		2100
E-11 1-2	E11	--	12	24	1970		1970
EY2Sed-04-12-24	C19	09/29/04	12	24	1900		1900
SYS-30-12-24	B3	09/30/04	12	24	1500	J	1500
EY1S-37-12-24	E12	10/05/04	12	24	1500		1500
MW-4 1-2	H5	--	12	24	1210		1210
EY1SP-01-12-24	E11	10/05/04	12	24	1200		1200
C-20 1-2	C20	--	12	24	917		917
D13 1-2	D13	--	12	24	894		894
EY1G-13-12-24	D13	09/28/04	12	24	850		850
B-7 1-2	B7	--	12	24	795		795
SYS-19-12-24	B8	09/30/04	12	24	730		730
EY2Sed-02-12-24	D17	09/29/04	12	24	570		570
B-4 1-2	B4	--	12	24	555		555
A-15 1-2	A-15	--	12	24	540		540
E-6 1-2'	E6	--	12	24	532		532
SYS-31-12-24	B2	09/30/04	12	24	490	J	490
B-3 1-2	B3	--	12	24	378		378
E-12 1-2	E12	--	12	24	350		350
C-1 1-2'	C1	11/11/2005	12	24	279		279
SYS-27-12-24	B7	09/30/04	12	24	260	J	260

TABLE 2
Average Residual Lead Results in Surface Soils (0 to 2 feet bgs) after Spot Removal
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)							
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers	Value used in Mean Lead Calculation (mg/kg)^(b)
SYS-24-12-24	A6	09/30/04	12	24	250		250
SYS-29-12-24	B4	09/30/04	12	24	230	J	230
NYG-07-12-24	H4	09/28/04	12	24	230		230
G-1 1-2	G1	--	12	24	197		197
EY2S-10-12-24	A16/17	09/29/04	12	24	180		180
B-1 1-2'	B1	--	12	24	163		163
EY2S-11-12-24	A18	09/29/04	12	24	160		160
EY2S-12-12-24	A20	09/29/04	12	24	160		160
NYG-06-12-24	H4	09/28/04	12	24	160		160
SYS-34-12-24	A7	09/30/04	12	24	140	J	140
EY2S-13-12-24	A22	09/29/04	12	24	130		130
B-2 1-2'	B2	--	12	24	129		129
G-3 1-2	G3	--	12	24	125		125
E-10 1-2	E10	--	12	24	124		124
SYS-23-12-24	A7	09/30/04	12	24	120		120
SYS-22-12-16	A8	09/30/04	12	24	120		120
SYS-18-12-24	B9	09/30/04	12	24	120		120
EY1S-39-12-24	F12	10/05/04	12	24	120		120
H-4 1-2	H4	--	12	24	118		118
B-21 1-2	B21	--	12	24	116		116
SYS-33-12-24	A9	09/30/04	12	24	100	J	100
SYS-17-12-24	B10	09/30/04	12	24	100		100
D-15	D15	--	12	24	97		97
B-6 1-2	B6	--	12	24	91		91
MW-2 1-2	E9	--	12	24	82		82
I-3 1-2	I3	--	12	24	77		77
SYS-26-12-24	A4	09/30/04	12	24	73		73
SYS-21-12-24	A9	09/30/04	12	24	65		65
C-10 1-2	C10	--	12	24	63		63
B-22 1-2	B22	--	12	24	60		60
SYS-20-12-24	A10	09/30/04	12	24	58		58
E-13 1-2	E13	--	12	24	57		57
SYS-25-12-24	A5	09/30/04	12	24	54		54
SYS-36-12-24	A3	09/30/04	12	24	53	J	53
EY2S-09-12-24	C18	09/29/04	12	24	52		52

TABLE 2
Average Residual Lead Results in Surface Soils (0 to 2 feet bgs) after Spot Removal
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)							
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers	Value used in Mean Lead Calculation (mg/kg)^(b)
G-4 1-2'	G4	--	12	24	52		52
SYS-35-12-24	A5	09/30/04	12	24	49	J	49
A-12 12-24	A12	--	12	24	43		43
B-17 1-2	B17	--	12	24	43		43
C-17 1-2'	C17	11/09/05	12	24	41		41
SYS-32-12-24	A11	09/30/04	12	24	40	J	40
D-4 1-2	D4	--	12	24	40		40
NYG-08-12-24	H5	09/28/04	12	24	39		39
A-13 1-2	A13	--	12	24	36		36
D-12 1-2'	D12	11/09/05	12	24	36		36
H-1 1-2	H1	--	12	24	36		36
D-15	D15	--	12	24	35		35
MW-3 12-24"	A1	--	12	24	35	U	18
EY2S-15-12-24	A26	09/29/04	12	24	34		34
B-23 1-2	B23	--	12	24	33	U	17
C-14 1-2	C-14	--	12	24	33		33
EY1G-12-12-24	D11	09/28/04	12	24	33		33
B-24 1-2	B24	--	12	24	32		32
C-21 1-2'	C21	11/09/05	12	24	32		32
B-8 1-2	B8	--	12	24	32		32
H-2 1-2	H2	--	12	24	31		31
C-9 1-2	C9	--	12	24	30		30
B-13 1-2	B13	--	12	24	29		29
A-18 1-2	A18	--	12	24	29		29
F-2 1-2	F2	--	12	24	29		29
C-12 1-2	C12	--	12	24	29		29
D-6 12-24	D6	--	12	24	29		29
A-4 12-24	A4	--	12	24	28		28
C-11 1-2	C11	--	12	24	28		28
EY1G-15-12-24	A14/B14	09/28/04	12	24	28		28
EY2S-08-12-24	C16	09/29/04	12	24	28		28
A-2 1-2'	A2	11/11/05	12	24	27		27
I-1 1-2'	I1	11/11/05	12	24	27		27
E-4 1-2	E4	--	12	24	27		27
NYG-03-12-24	I2	09/28/04	12	24	26		26

TABLE 2
Average Residual Lead Results in Surface Soils (0 to 2 feet bgs) after Spot Removal
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)							
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers	Value used in Mean Lead Calculation (mg/kg)^(b)
F-5 1-2	F5	--	12	24	26		26
D-9 1-2	D9	--	12	24	26		26
F-9 1-2	F9	--	12	24	24		24
NYG-01-12-24	I1	09/28/04	12	24	23		23
I-2 1-2'	I2	11/11/05	12	24	22		22
C-13 12-24	C13	--	12	24	22		22
C-5 1-2	C5	--	12	24	22		22
G-9 1-2	G9	--	12	24	21	U	11
C-15 1-2	C-15	--	12	24	21	U	11
EY2S-14-12-24	A24	09/29/04	12	24	21		21
NYG-02-12-24	H1	09/28/04	12	24	21		21

TABLE 2
Average Residual Lead Results in Surface Soils (0 to 2 feet bgs) after Spot Removal
ESB, Inc. - Atlanta, GA (HSI 10778)

SURFACE SOILS (0 - 2 FEET BGS)							
Sample Location	Grid	Date Sampled	Depth-Start (in. bgs)	Depth-End (in. bgs)	Lead (mg/kg)^(a)	Qualifiers	Value used in Mean Lead Calculation (mg/kg)^(b)
D-10 12-24	D10	--	12	24	20		20
F-10 1-2	F10	--	12	24	20	U	10
B-15 1-2'	B15	11/09/05	12	24	20		20
C-3 1-2	C3	--	12	24	20		20
E-5 1-2'	E5	11/10/05	12	24	19		19
EY1G-09-12-24	F10	09/28/04	12	24	19		19
E-3 1-2	E3	--	12	24	18		18
G-7 1-2'	G7	11/10/05	12	24	18		18
A-19 1-2	A-19	--	12	24	17	U	9
F-3 1-2	F3	--	12	24	17		17
F-4 1-2	F4	--	12	24	17		17
EY1G-14-12-24	B11	09/28/04	12	24	17		17
D-5 1-2	D5	--	12	24	17	U	8
B-11 1-2	B11	--	12	24	17	U	8
B-25 1-2	B25	--	12	24	16	U	8
D-3 1-2'	D3	--	12	24	15	U	8
NYG-04-12-24	H2	09/28/04	12	24	15		15
EY1G11-12-24	D9	09/28/04	12	24	14		14
EY1G-10-12-24	F11	09/28/04	12	24	14		14
C-4 1-2'	C4	11/10/05	12	24	10		10
D-16 1.5-2	D16	--	18	24	1050		1050
F-12 1.5-2.0	F12	--	18	24	353		353
D-17 1.5-2.0	D17	--	18	24	275		275
H-6 1.5-2.0	H6	--	18	24	49		49
E-14 18-24"	E-14	--	18	24	36		36
Mean Residual Lead Concentration (mg/kg) in Surface Soil:							274

Notes:

(a) Samples above the Type 4 RRS of 930 mg/kg in the 0-12 inch soil interval removed. Samples greater than 4000 mg/kg removed in the 12 to 24 inch interval.

(b) 1/2 of the indicated detection limit was used for calculating the mean lead concentration in non-detects.

in. bgs = inches below ground surface

mg/kg = milligrams per kilogram

J = Result is estimated.

U = Result was not detected above the indicated reporting limit.

Prepared By/Date: MKB 12/29/14

Checked by/Date: SAG 12/30/14

FIGURES



ATTACHMENT A

SITE MAP WITH HISTORICAL POTENTIAL SOURCE AREAS

