

**PHASE I ENVIRONMENTAL SITE ASSESSMENT
NORTHWEST GEORGIA REGIONAL CAMPUS
(FORMERLY NORTHWEST GEORGIA REGIONAL HOSPITAL)
ROME, FLOYD COUNTY, GEORGIA**

PROJECT NUMBER 3250

PREPARED FOR:



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THE INFORMATION CONTAINED IN THIS REPORT TITLED
**"PHASE I ENVIRONMENTAL SITE ASSESSMENT
NORTHWEST GEORGIA REGIONAL CAMPUS - 147 ACRES
(FORMERLY NORTHWEST GEORGIA REGIONAL HOSPITAL)
ROME, FLOYD COUNTY, GEORGIA"**

IS CONFIDENTIAL AND INTENDED FOR
GEORGIA DEPARTMENT OF BEHAVIORAL HEALTH & DEVELOPMENTAL DISABILITIES
AND THE GEORGIA STATE PROPERTIES COMMISSION

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FEBRUARY 2012

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ACRONYMS

| | |
|----------|-----------------------------------------------------------------------|
| ACM | Asbestos Containing Material |
| AST | Above Ground Storage Tank |
| ASTM | American Society for Testing and Materials |
| AUL | activity use limitations |
| bgs | below ground surface |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CESQG | Conditionally Exempt Small Quantity Generator |
| CFR | Code of Federal Regulations |
| CORRACTS | Corrective Action Report |
| CERCLIS | CERCLA Information System |
| CPSA | Consumer Products Safety Act |
| EDR | Environmental Database Search Report |
| ERNS | Emergency Response Notification System |
| ESA | Environmental Site Assessment |
| FEMA | Federal Emergency Management Agency |
| GA DNR | Georgia Department of Natural Resources |
| GA EPD | Georgia Environmental Protection Division |
| GEPA | Georgia Environmental Policy Act |
| GLE | GLE Associates, Inc. |
| HSRP | Hazardous Site Response Program |
| HSI | Georgia Hazardous Sites Inventory |
| km | kilometer |
| LUST | leaking underground storage tank |
| LQG | large quantity generator |
| MCL | maximum contaminant level |
| MSL | Mean Sea Level |
| NFAR | No Further Action Required |
| NFRAP | No Further Remedial Action Planned |
| NONGEN | non-generating |
| NPL | National Priorities List |
| OSHA | Occupational Safety and Health Administration |
| PCB | Polychlorinated biphenyl |
| PPCAP | Prospective Purchaser Corrective Action Plan |
| RCRA | Resource Conservation and Recovery Act |
| REC | Recognized Environmental Condition |
| RQSM | Reportable Quantities Screening Method |
| RST | registered storage tank |
| SQG | small quantity generator |
| SWLF | Solid Waste Facility/Landfill Sites |
| SWPPP | Storm Water Pollution Prevention Plan |
| TSCA | Toxic Substances Control Act |
| USGS | United States Geologic Survey |
| U.S. EPA | U.S. Environmental Protection Agency |
| UST | underground storage tank |
| USTMP | Underground Storage Tank Management Program |
| WMA | Wildlife Management Area |

ENVIRONMENTAL PROFESSIONAL DECLARATION

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR Part 312.

I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed all appropriate inquiries in accordance with the standards and practices set forth in 40 CFR Part 312.



CAROL W. MCPHERSON, *PROJECT DIRECTOR*

1.0 EXECUTIVE SUMMARY

1.1 OVERVIEW

On December 12, 2011, **PEACHTREE ENVIRONMENTAL** (Peachtree) was retained by the Georgia Department of Behavioral Health and Developmental Disabilities to complete a Phase I Environmental Site Assessment (Phase I ESA) at the Northwest Georgia Regional Campus (formerly Northwest Georgia Regional Hospital) located at 705 North Division Road, in Rome, Floyd County, Georgia (hereafter referred to as the “Subject Property, “Property” or the “Site”).

1.2 INTRODUCTION

The purpose of the Phase I ESA is to identify Recognized Environmental Conditions (RECs) in connection with the Site. The assessment included a historical use review, agency records review, and a site reconnaissance including interviews with knowledgeable personnel. Peachtree’s assessment was conducted in general accordance with applicable ASTM and AAI standards and is subject to limitations, exceptions and deviations as described in Sections 2.0 and 8.0.

1.3 SITE DESCRIPTION

The Property is located approximately 2 miles northwest of the city limits of Rome, Georgia. The Property was most recently utilized as a campus for a mental health facility operated by the Georgia Department of Behavioral Health and Developmental Disabilities (GDBHDD). The Property is currently not being utilized as a hospital; however, it is being maintained by GDBHDD personnel that utilize some office spaces and maintenance areas.

An unnamed tributary is piped into the northern portion of the Property and flows from north to south along the western property boundary. This tributary appears to be piped underground and surfaces near the western property boundary where it flows southeast through the Site and exits the southern portions of Property. Groundwater beneath the Property is expected to flow from north to south towards the unnamed tributary.

The immediate vicinity is comprised of the Northwest Georgia Public Health facility to the north, industrial properties to the northwest, Georgia Department of Corrections to the southwest, a retirement home (Golden Living Center) to the northeast, a rail road line and heavily wooded areas to the south and a residential area and various commercial businesses to the southeast. The outlying areas consist of a lake and wetland areas, residential, commercial and industrial properties.

1.4 HISTORICAL USE INFORMATION

According to interviews and historical review, Property was initially acquired by the United

States government in 1943 and utilized as Battey General Hospital in 1945. The Property operated as Battey General Hospital until the mid 1970s, when it was renamed Northwest Georgia Regional Hospital and utilized as a mental health facility.

Based on a review of historical aerial photographs, six (6) former fuel oil ASTs (capacity unknown) were present in the approximate location of the current propane ASTs (Energy Plant) circa 1954 to 1993.

Peachtree reviewed a May 2005 Final Report for Asbestos Abatement, prepared by GLE Associates, Inc. (GLE), concerning asbestos survey and abatement activities at the Site. According to the report, a limited asbestos survey (at suspect locations) indicated the presence of asbestos containing materials (ACMs) and subsequent asbestos abatement activities were performed at these locations. Other areas of the Property that were not included in these abatement activities could have ACMs present.

The review of historical uses of the Subject Property resulted in the following concerns:

- ▶ The former presence and historical operation of the six (6) fuel oil ASTs at the Property are considered a recognized environmental condition (REC). The former railroad spur is also considered a REC as it is likely that the ASTs contents were replenished via railcar supplies. In general, the historic usage of the Site as a self-sustaining hospital campus should be considered a REC.
- ▶ The presence of the industrial facilities on the adjacent western properties (including the former General Electric plant) is considered a REC.
- ▶ Prior leaking USTs were located near Buildings 412 and 920. According to the environmental database search report and interviews, these USTs have been removed; however, the areas in which these USTs were located are considered to be RECs.

1.5 RECORDS REVIEW

A total of ten federal, state and supplemental regulatory database groupings were reviewed, all of which are included in the Environmental Database Search Report, dated November 17, 2011.

The following environmental concerns are noted based on the records review, which are addressed in this Phase I ESA or are noted as concerns for addressing in a Phase II ESA:

- ▶ Two up gradient and adjacent properties are listed as Leaking Underground Storage Tank (LUST) sites.
- ▶ The former GE Plant, not adjacent but within 3/4 of a mile northwest, is a known EPA Superfund site which has had confirmed releases of Polychlorinated Biphenyls (PCBs) to soil, groundwater, and surface water.

1.6 SITE RECONNAISSANCE

The Site reconnaissance was performed on January 24 and 25, 2012 to investigate possible hazards associated with the Subject Property and the surrounding property. Peachtree personnel noted areas of concern, which are addressed in this Phase I ESA or are noted as concerns for further assessment.

- ▶ Use, storage and disposition of hazardous substances was noted in the Maintenance Shop (Building 920), the Equipment Shed (Building 921), Building 809, the Energy (Steam) Plant (Building 902), the Chiller Plant (Building 911), Maintenance Storage (Building 909), Main Hospital (Building 103), Lab/Pharmacy (Building 304) and Bio Hazard Storage (Building 903).
- ▶ One (1) UST and fourteen (14) ASTs are located on the Property.
- ▶ Solid waste management areas are located west of the former Laundry (Building 919), the bio hazards staged inside Bio Hazard Storage (Building 903) and areas in and around the former on-site incinerator.
- ▶ Notable floor drains are located adjacent to the Bio Hazard Storage (Building 903).

On-site personnel interviewed at the time of the Site visit indicated that all hazardous substances that were observed were either slated for appropriate on-site use for property maintenance or they (i.e. bio-hazards and lab chemicals) were slated for proper disposal by Stericycle. The remaining areas are noted as concern for further assessment.

1.7 INTERVIEWS

Peachtree interviewed six (6) parties by phone, email or in person regarding practices or conditions which could be a potential environmental concern. The parties included personnel from:

- ▶ Georgia Department of Behavioral Health & Developmental Disabilities
- ▶ Georgia EPD Underground Storage Tank Management Program (USTMP)
- ▶ Georgia EPD - Wildlife Resources Division

The interviews generated or reinforced the following concerns:

- ▶ Prior use of the Property as a self-sustaining hospital campus, including historic demolition and renovation activities, former operation of an on-site rail spur, former operation of six (6) former fuel oil ASTs from circa 1954 to 1993, and former operation of two (2) on-site incinerators.
- ▶ In addition, there exists a potential that historic land filling activities (utilizing on-site incinerator ash and/or demolition debris) may have adversely impacted the Property in the area of the former Olympic-sized swimming pool. This area holds the potential for methane gas deposits beneath the subsurface.

1.8 DATA GAPS

No current owners or occupants of neighboring properties were available for interviews; however, Peachtree does not consider this a significant data gap which would alter the conclusions of this report.

1.9 FINDINGS AND CONCLUSIONS

Based on Peachtree's review of available historical records and reports, interviews, agency records and our Site and area reconnaissance, Peachtree's Phase I ESA concludes that there is evidence of potential historical RECs on the Property. These RECs stem from both historic use of the Site, as well as off-site contaminants which could have migrated onto and adversely affected the Property. The RECs and recommendations for each are as follows:

1. Three (3) former USTs were located adjacent to the Maintenance Shop (Building 920). These USTs included two (2) gasoline (4,000 gallon and 2,000 gallon) USTs and one (1) 500-gallon waste oil UST (associated with the former hydraulic lift system). Though an NFAR status was issued for each of the releases, there remains a potential for soil and or groundwater contamination in these areas of the Property. **Recommendation:** Peachtree recommends soil and groundwater sampling in these areas in order to determine if the Site has been impacted by petroleum related constituents.
2. Based on the historical use of the Property as a self-sustaining hospital campus (including historic demolition and renovation activities, former operation of an on-site rail spur, former operation of six (6) former fuel oil ASTs from circa 1954 to 1993, and former operation of two (2) on-site incinerators), these specific past on-site activities should be considered a REC.

In addition, there exists a potential that historic land filling activities (utilizing on-site incinerator ash and/or demolition debris) may have adversely impacted the Property. An area south of the Laundry (Building 919) was back filled with unknown fill and there exists the potential for methane gas deposits beneath the subsurface. **Recommendation:** Peachtree recommends conducting soil and potentially groundwater sampling in these areas to determine if these historic on-site activities have impacted the Property.

3. Based on Peachtree's review of the May 2005 Final Report for Asbestos Abatement, a limited survey and abatement was conducted at multiple structures at the Property. **Recommendation:** Peachtree recommends that, if demolition or renovation is to be conducted at any additional structures not previously surveyed or abated on the Property, full asbestos and lead paint surveys be conducted to locate any potential ACMs. In the event that ACMs are found, proper abatement should be conducted.
4. **Recommendation:** Peachtree recommends implementing best management practices

(BMPs) regarding the disposal of any unused paint and petroleum products, cleaning supplies, and laboratory/bio-medical waste observed at the Property. Note: On-site personnel have indicated that all hazardous substances are either slated for appropriate on-site use for property maintenance or they were slated for proper disposal by Stericycle.

5. Two western adjacent facilities, Zartic Incorporated and West Rome Dyehouse are reported as previously containing leaking USTs. Due to the close proximity to the Property, the observed surface water feature that extends from the Zartic property to the east onto the Site and the current and historical use of these adjacent facilities, the activities at these two facilities have the potential for having had environmental impact to the Subject Property.

The former General Electric (GE) Medium Transformer Plant is located approximately 3/4 of a mile northwest of the Property. The former GE Plant is a known EPA Superfund site (Facility ID # GAD003308145) which has had confirmed releases of Polychlorinated Biphenyls (PCBs) to soil, groundwater, and surface water. Due to the proximity to the Property, this former facility represents an off-site REC. ***Recommendation:*** Peachtree recommends conducting soil, groundwater, surface water and sediment sampling on the western region of the Property to determine if the three off-site facilities (Zartic, West Rome Dyehouse and GE) have impacted the Property through their historic and current operations.

2.0 INTRODUCTION

2.1 PURPOSE

The purpose of the Phase I ESA is to identify Recognized Environmental Conditions¹ (RECs) in connection with the Site. The assessment included a historical use review, interviews, agency records review, and a site reconnaissance. This assessment was conducted in general accordance with the scope and limitations of the American Society of Testing and Materials (ASTM) Standard E 1527-05 and 40 CFR Part 312- Standards and Practices for All Appropriate Inquiries (AAI Standard). Any exception to, or deletions from, this practice is described in Section 2.3 and Section 8.0 of this report. Peachtree has conducted this evaluation using a degree of care and skill ordinarily exercised under similar conditions by similarly qualified, reputable professionals practicing in the same or similar locality at the time of service.

2.2 DETAILED SCOPE OF SERVICES

The following is a brief overview of the activities performed by Peachtree during the Phase I ESA process:

- ▶ **Site Description and Adjacent Properties** - Peachtree provides a general discussion of Site and vicinity general characteristics including the topography, geology and description of the current use of the Property. Adjacent properties can often affect the environmental condition of the Property in question, either through movement of hazardous substances across adjoining surfaces or through migration in subsurface environments. Although it is often not possible to access neighboring properties, Peachtree's review included a visual inspection of publicly accessible adjacent areas and an assessment of their potential influence on the Site.
- ▶ **Review of the Property History** - Past usage of the Site is an important issue in that certain activities may have resulted in environmental conditions unrelated to present activity.
- ▶ **Interviews** - The owners and occupants of the Property were interviewed to the extent possible to obtain information indicating recognized environmental conditions in connection with the Site. Local government officials were also contacted to obtain any information pertaining to environmental conditions of the Property.
- ▶ **Site Reconnaissance** - The Site was initially evaluated through a limited visual

¹REC - The presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate a release, or a material threat of a release of any hazardous substances or petroleum products into the ground, groundwater, or surface water of the property. The term also includes hazardous substances or petroleum products, even under conditions in compliance with environmental laws. (ASTM E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process).

inspection of surface conditions. The purpose of this inspection was to identify obvious signs of polluting activity such as stressed vegetation, improper or illegal waste or chemical storage, above ground or underground storage tanks, stained soils, etc. In addition to identifying site hazards, an evaluation of the potential presence of local, natural, and cultural resources such as wetlands and historic sites was conducted to determine their relation to Site environmental conditions.

- ▶ **Agency Records Review** - Agency records which list environmental occurrences in the area were reviewed to identify any environmental concerns that could impact the environmental integrity of the Site.

Further details relative to each of the above-mentioned Phase I review tasks is given in the text of this document.

2.3 LIMITATIONS, EXCEPTIONS AND DEVIATIONS

Peachtree's Phase I Site Assessment is based on the conditions existing at the Site at the time of the Site visit. Results of the ESA are based on information provided to Peachtree, or which was reasonably available to Peachtree from records, interviews, and the Site visit.

This report is based on the current regulatory environment and fully implemented environmental regulations, and was prepared in general accordance with the ASTM and AAI Standards. Any exception to, or deviations from, this practice are described in Section 2.3 and Section 8.0 of this report. It should be noted that future regulatory modifications, agency interpretations, and/or attitude changes may affect the compliance status of the Site.

Peachtree's comments on actual conditions of adjacent properties and on whether activities have affected the subject Site are based on visual observation and/or best professional judgment of the available information. Peachtree's review of various database information relative to adjacent properties was obtained from publicly available sources and other secondary sources of information produced by entities other than Peachtree. While efforts have been made to substantiate this third-party information, Peachtree cannot guarantee its completeness or accuracy. Peachtree augmented the database review with interview information, as appropriate, and reconnaissance activities at the Site and in the vicinity of the Site. In doing so, Peachtree has applied best technical and scientific judgment within the allotted time and economic parameters of this assignment. Data Gaps listed in Section 8.0 should reflect any deficiencies in the report caused by insufficient time and/or resources.

During the record review, interviews, and Site reconnaissance activities, Peachtree searched for information pertaining to the potential for concerns relating to radon, asbestos, and wetlands. Peachtree did not perform sampling or a survey of any kind in relation to these potential environmental concerns. The information presented herein with respect to these items is based on Peachtree's best professional judgment only.

Peachtree's observations, findings, and opinions must not be considered as scientific certainties but solely as opinions based upon our professional judgment concerning the significance of the limited data gathered during the course of the ESA. Specifically, Peachtree does not and cannot represent that the Site contains no latent hazardous or toxic materials, asbestos, or other latent conditions beyond those observed by Peachtree during the Site assessment. Further, the services herein shall in no way be construed, designed, or intended to be relied upon as legal interpretation or advice.

During a Phase I ESA, Peachtree is only able to investigate surface conditions and conditions or areas reasonably accessible to Peachtree investigators; therefore, Peachtree's comments on subsurface or concealed conditions are limited to the comments/opinions stated herein. The assessment was performed in accordance with generally accepted practices of the profession, undertaking similar studies at the same time and in the same geographical area. Peachtree observed the degree of care and skill generally exercised by the profession under similar circumstances and conditions. No other warranty is expressed or implied.

2.4 USER RELIANCE

This report, including supporting field data, notes, and laboratory data (where applicable) (collectively referred to hereinafter as "information"), was prepared or collected by Peachtree for the benefit of its clients, the Georgia Department of Behavioral Health and Developmental Disabilities and the Georgia State Properties Commission. The effective date of the report is February 24, 2012. Peachtree's clients may release the information to third parties, who may use and rely upon the information at their discretion. However, any use of or reliance upon the information by a party other than a Peachtree named client shall be solely at the risk of such third party and without legal recourse against Peachtree and its respective employees, officers, or directors; regardless of whether the action in which recovery of damages is sought is based upon contract, tort (including the sole, concurrent, or other negligence and strict liability of Peachtree), statute, or otherwise. This information shall not be used or relied upon by a party that does not agree to be bound by the above statement.

3.0 SITE DESCRIPTION

3.1 SITE LOCATION

The Subject Property is located at 705 North Division Street, Rome, Floyd County, Georgia (see **Figure 1 - Site Location Map**).

3.2 SITE AND VICINITY GENERAL CHARACTERISTICS

The Property is comprised of 147 acres located approximately 2 miles northwest of the city limits of Rome, Georgia. The Property was most recently utilized as a campus for a mental health facility which was closed in July 2011. The immediate vicinity is comprised of Georgia Department of Corrections properties, an industrial property (Syntec Industries), a retirement home (Golden Living Center) and private, residential properties. The outlying areas consist of residential, commercial and industrial properties.

3.2.1 Topography

The United States Geological Survey (USGS) 7.5-minute topographic map for the Rome North, Georgia area was reviewed for relevant Site information and vicinity topographical characteristics (see **EDR Report - Pages A-2 & A-7**). Topographically, the Property slopes gently from the northeast to southwest with the lowest elevation observed at the southern property boundary. An unnamed tributary was observed east and adjacent to Building 921 (Equipment Shed) flowing from north to south. This tributary appeared to be piped underground and surfaced near the western property boundary, where it flows southeast off the Property.

According to the Federal Emergency Management Agency (FEMA), the Property is not located within a designated 100-year or 500-year flood hazard zone. Further, according to a review of the National Wetland Inventory map, there are no areas of designated wetlands located on the Property. A 500-year flood hazard zone and designated wetlands are present on the southwestern adjacent properties.

3.2.2 Geology, Hydrology and Hydrogeology

According to the United States Department of Natural Resources and The Georgia Geologic Survey's Geologic Map of Georgia, the Site is located north of the Brevard Fault Zone of Cataclasis in the Blue Ridge and Piedmont Geologic Region. Typical parent material (bedrock) in this region consists primarily of mica shist/gneiss/amphibolite deposits. Based on information provided by the U.S. Department of Agriculture's Soil Conservation Service, soils appear to consist of a component known as TOWNLEY which consists of silty loam in the upper six inches, grading to a silty clay loam from six to twenty-two inches (varying soil textures from twenty-two to thirty-five inches), and then grading to weathered bedrock from thirty-five to forty inches.

Based on review of the topographic map and Site reconnaissance observations, shallow groundwater beneath the Property is expected to flow to the south, southwest towards the unnamed tributary.

3.3 DESCRIPTION OF THE PROPERTY AND CURRENT USE

The Property was most recently utilized as a campus for a mental health facility and includes a security kiosk; main hospital; ancillary medical and administrative offices; laboratory/pharmacy; on-campus patient and staff housing; events pavilion; laundry building; maintenance, grounds keeping and equipment storage areas; warehouse storage; propane tank farm; steam and chiller plants; and incinerator / bio-hazard storage building. The Property is secured with eight-foot chain link fencing and a gated entrance with 24-hour security. A network of asphalt paved roadways and parking areas provide access to the perimeter of the Property while concrete paved sidewalks provide access between buildings. Unpaved areas are either wooded or maintained as grass and vegetative landscape areas. An unnamed tributary is piped into the northern portion of the Property and flows north to south along the western property boundary.

Access to the Property can be gained directly from Charlton Street. Topographically, the property slopes slightly from the northeast to the southwest. The lowest point of the Property is found on the southern portion, near the location of the unnamed tributary.

3.4 CURRENT USE OF SURROUNDING PROPERTIES

- ▶ North - Adjacent to the north of the Property is the Northwest Georgia Public Health facility.
- ▶ South - Heavily wooded areas, with a rail road line, Constitution Lake and wetland areas beyond;
- ▶ Northeast/Southeast - Northeast of the Property is Redmond Circle followed by Golden Living Center retirement homes. North Division Street followed by various commercial businesses and a residential area border the Property to the southeast.
- ▶ Northwest/Southwest - Northwest of the Property are industrial properties, Syntec Industries and Zartic Incorporated. Georgia Department of Corrections detention center properties border the Property to the southwest.

4.0 HISTORICAL USE INFORMATION

4.1 OWNERSHIP HISTORY (HISTORICAL PROPERTY USE)

According to interviews and historical review, Property was initially acquired by the United States government in 1943 (per General Order No. 23, 15 May 1943) and utilized as Battey General Hospital in 1945. The Property was conveyed to the State of Georgia in January 1947. The Property operated as Battey General Hospital until the mid 1970s, when it was renamed Northwest Georgia Regional Hospital and utilized as a mental health facility. The Property operated as Northwest Georgia Regional Hospital until its official closure on July 30, 2011. Since that time, the campus has remained inactive, with the exception of a few buildings leased by outside parties for utilization of office space.

4.2 TITLE REVIEW

To date Peachtree has not been provided with a current chain-of-title documents and has not otherwise secured a title search for the Subject Property. As such, Peachtree recommends that the user check or engage a title company or title professional to check reasonably ascertainable recorded land title records for environmental liens currently recorded against the Site. Title documents also aide in assessing the names of companies that may have used or stored chemicals on-site in the past. If companies are identified, additional investigation may be warranted to better assess the possibility of chemical use on Site.

4.3 AERIAL PHOTOGRAPH REVIEW

Peachtree reviewed aerial photographs dated 1943, 1954, 1965, 1972, 1988, 1993, 2005, 2006, 2007 and 2009. Aerial photographs aid in the review of prior land use and provide evidence of past processes, facilities, or surface features that might be of an environmental concern. The aerial photographs were obtained from the Environmental Data Resources, Inc. aerial photography print service and Google Earth's online database of aerial photography. Select photographs showing significant Site changes over time are included in **Appendix A**. The following is a summary of the aerial photographs reviewed:

1943: The Site is cleared for future construction of the hospital campus. The layout of the future campus and associated roads are evident across the Site. The surrounding properties appear heavily wooded and railroad tracks are present to the south of the Site.

1954: The Site is improved with multiple structures, roads, and walkways associated with the Battey General Hospital. Six (6) above ground storage tanks (ASTs) are present near the southwestern portion of the Property. A railroad spur is present on the southwestern portion of the Site. Similar to the 1943 photo, the surrounding properties appear heavily wooded and railroad tracks are present to the south of the Site.

- 1965:** The Site appears similar to the 1954 photo, with the addition of new structures at the northwestern portion of the Site. Residential structures are present on the northeastern and southeastern portions of the Site. Residences are also present to the south and southeast of the Site. Surrounding properties to the west appear to be improved with structures while surrounding properties to the north and east appear heavily wooded.
- 1972:** The Site appears to be under renovation. Multiple structures observed in prior year photos within the central portion of the Site have been demolished and improved with approximately 13 larger structures (various present day 100-104, 300-319, 400-404, and 406-412 buildings). The surrounding properties to the west are improved with large industrial structures while additional residential areas are present to the south. Apartment homes are present to the north of the Site.
- 1988:** Additional structures observed in prior year photos within the central portion of the Site have been demolished. Structures observed at the northwestern property boundary have been demolished and improved with the present day maintenance building (Building 920) and Equipment Shed (Building 921). The surrounding properties appear relatively unchanged, however, the scale of the photograph does depict the General Electric plant to the northwest of the Site.
- 1993:** The Therapy Center (Building 405) and Pavilion (Building 102) are present at the center and northeastern portions of the Site, respectively. The six (6) ASTs and railroad spur observed in photos from 1954 through 1988 are no longer present at the southwestern portion of the Site. The surrounding properties appear relatively unchanged with the exception of the extension of State Route 1 northeast of the Site.
- 2005:** The Site and surrounding properties appear relatively unchanged.
- 2006:** Two (2) structures on the northeastern portion of the Site have been demolished. The property to the north appears to be graded for future construction of the Northwest Georgia Public Health facility. The remainder of the Site and surrounding properties appear relatively unchanged.
- 2007:** The Site appears relatively unchanged. The Northwest Georgia Public Health facility is now present to the north of the Site. The remainder of the surrounding properties appear relatively unchanged.
- 2009:** The Site and surrounding properties appear as they did during Site reconnaissance activities.

The former presence and historical operation of the six (6) ASTs at the Property are considered RECs. The former railroad spur is also considered a REC as it is likely the

ASTs contents were replenished via railcar supplies. In general, the historic usage of the Site as a self-sustaining hospital campus should be considered a REC.

The presence of the industrial facilities on the adjacent western properties (including the former General Electric plant) is considered a REC.

4.4 HISTORICAL TOPOGRAPHIC MAP REVIEW

Peachtree reviewed historical topographic maps from the target quadrant dated 1895, 1904, 1967, and 1985. Historic topographic maps aid in the review of prior land use and provide evidence of past processes, facilities, or surface features that might be of an environmental concern. The historic topographic maps were obtained from Environmental Data Resources Historical Topographic Map Report. The entire map report is included in **Appendix A**. The following is a summary of the topographic maps reviewed:

1904: The target quadrant listed for this map is Rome. The Site is located in West Rome, northwest of the city of Rome and the Coosa River. Horseleg Creek is depicted to the south of the Site flowing west to east towards the Coosa River. The North Rome/Attalla Railroad and Chattanooga Rome and Southern Railroad intersect to the southeast of the Site. Area roadways are present throughout the vicinity. Exact elevations and contours are difficult to determine due to the scale of the map.

1967: The target quadrant listed for this map is Rome North. The Site is depicted as Battey State Hospital with outlines of the campus structures, ASTs, and roadways. A railroad spur associated with the Central of Georgia railroad extends onto the southwest portion of the Site. Lavender Drive is present to the west of the Site. Division Street is present to the east and north of the Site. A quarry is depicted north of Division Street. The elevation ranges on the Site from approximately 597 ft-msl at the southern property boundary to approximately 640 ft-msl at the northern property boundary.

1985: The target quadrant listed for this map is Rome North. The Site is depicted as Northwest Georgia Regional Hospital with outlines of the campus structures, ASTs, and roadways. Compared to the 1967 map, multiple structures appear to have been demolished, and new larger structures are depicted. The quarry located north of the Site appears to have expanded in size. Larger industrial structures are outlined on the surrounding properties to the west/northwest. Redmond Road and Redmond Circle are present to the east of the Site. The elevation ranges on the Site are consistent with the 1967 map.

4.5 OTHER HISTORICAL SOURCES

In the late nineteenth century, the Sanborn Company began preparing maps for use by fire insurance companies. These maps indicate construction materials of specific structures in developed urban areas. With the advent of retail gasoline service stations, the locations

of petroleum tanks were noted. These maps were updated and expanded periodically through the twentieth century. Sanborn Maps are typically published for developed (historical) business districts. Review of Sanborn Maps indicated that coverage is not available for the Site.

A review of a City Directory search provided by Environmental Data Resources, Inc. indicated that coverage is available for the Site address for the years 1980, 1995, 2000, and 2005. The 1980 and 1995 directories cite the Property as the Northwest Georgia Regional Hospital (with the 1980 directory including the sub-listings of State Adolescent Services and State Corrections Offenders Rehabilitation Department). Due to the Site's address change to 705 North Division Street during the late 1990s, the listings for 2000 and 2005 refer to an adjacent property (Northwest Georgia Public Health facility). City directories were not reviewed for 705 North Division Street due to prior knowledge of the Northwest Georgia Regional Hospital's operation at that address post-1995. Coverage for nearby properties is also available for the years 1975, 1980, 1985, 1995, 2000, 2005, and 2010. These listings are for residential, commercial and industrial properties. A copy of the Sanborn Map Report and City Directory Abstract are both included in **Appendix A**.

Ms. Jennifer Bedell with the GDNR Historic Preservation Division was contacted regarding any historical or archaeological areas of significance on the Site as required by the Georgia Environmental Policy Act (GEPA). To date, Peachtree has not received a response from this department. Peachtree did review the National Register of Historic Places for Floyd County, Georgia and the Subject Property is not currently listed within this historical database. A copy of the database listing is included in **Attachment 1**.

Peachtree also reviewed a May 2005 Final Report for Asbestos Abatement, prepared by GLE Associates, Inc. (GLE), concerning asbestos survey and abatement activities at the Site. Review of this report is detailed further in Section 6.2.9.

4.6 HISTORICAL USE OF ADJOINING PROPERTY

Historical aerial review reveal that properties adjacent to the target property were used primarily as undeveloped woodlands and pasture land during the early 1940's. By the mid 1960s the adjoining properties were under residential and/or industrial development.

5.0 RECORDS REVIEW

5.1 STANDARD ENVIRONMENTAL RECORD SOURCES

Regulatory environmental information was obtained from publicly available information databases and was reviewed for information indicating the presence of hazardous substances at the Site or surrounding properties. The databases reviewed were obtained from Environmental Data Resources, Inc. (EDR), an environmental information services company. The following is a summary of the databases searched, the ASTM standard search distance from the Site, and the number of sites identified in the search:

| DATABASE | MINIMUM SEARCH DISTANCE | SITES IN RADIUS |
|---------------------------------------------|-------------------------|-----------------|
| Federal Databases | | |
| National Priorities List (NPL) | 1.0 mile (1.6 km) | 0 |
| Proposed NPL | 1.0 mile (1.6 km) | 0 |
| Delisted NPL | 1.0 mile (1.6 km) | 0 |
| NPL Recovery | property only | 0 |
| CERCLIS | 0.5 mile (0.8 km) | 0 |
| CERC-NFRAP | 0.5 mile (0.8 km) | 0 |
| CORRACTS | 1.0 mile (1.6 km) | 0 |
| RCRA-TSD | 0.5 mile (0.8 km) | 0 |
| RCRA Lg. Quantity Generator | 0.25 mile (0.4 km) | 0 |
| RCRA CESm. Quantity Generators | 0.25 mile (0.4 km) | 0 |
| RCRA Non Generator | 0.25 mile (0.4 km) | 0 |
| ERNS | property only | 0 |
| State Databases | | |
| State Hazardous Waste | 1.0 mile (1.6 km) | 0 |
| Landfill/Solid Waste Disposal/Recycler | 0.5 mile (0.8 km) | 0 |
| LUST | 0.5 mile (0.8 km) | 3 |
| UST | 0.25 mile (0.4 km) | 1 |
| AST | 0.5 mile (0.8 km) | 0 |
| HIST LF | 0.5 mile (0.8 km) | 0 |
| Financial Assurance | property only | 1 |
| Federal ASTM Supplemental | | |
| CONSENT | 1.0 mile (1.6 km) | 0 |
| ROD | 1.0 mile (1.6 km) | 0 |
| UMTRA | 0.5 mile (0.8 km) | 0 |
| FINDS | property only | 0 |
| HMIRS | property only | 0 |
| MLTS | property only | 0 |
| MINES | 0.25 mile (0.4 km) | 0 |
| ODI | 0.5 mile (0.8 km) | 0 |
| PADS | property only | 0 |
| DOD | 1.0 mile (1.6 km) | 0 |
| FUDS | 1.0 mile (1.6 km) | 1 |
| RAATS | property only | 0 |
| TRIS | property only | 0 |
| SSTS | property only | 0 |
| FTTS | property only | 0 |
| State or Local ASTM Supplemental | | |
| Spills | property only | 0 |
| NON-HSI | 1.0 mile (1.6 km) | 2 |
| INST CONTROL | 0.5 mile (0.8 km) | 0 |
| DRYCLEANERS | 0.25 mile (0.4 km) | 0 |
| Tribal Records | | |
| INDIAN RESERV | 1.0 mile (1.6 km) | 0 |
| EDR Proprietary Historical Databases | | |
| Manufactured Gas Plants | 1.0 mile (1.6 km) | 0 |
| EDR Historical Auto Stations | 0.25 mile (0.4 km) | 0 |
| EDR Historical Cleaners | 0.25 mile (0.4 km) | 0 |
| US Brownfields | 0.5 mile (0.8 km) | 0 |

The information obtained by reviewing these databases is subject to the accuracy of the information provided by the sources. The databases identified eight (8) listings (including multiple listings of the Site) within a one mile search distance.

The database search report lists “unplottable sites” which are entries in the database that could not be specifically located (*i.e.* an incomplete address is listed). To remedy this, Peachtree reviewed the list of “unplottable” sites and compared them with the list of streets within applicable search distances of the Site. Peachtree also conducted a drive by reconnaissance of the area in order to help identify the unplottable sites. None of the sites listed were in close proximity to the Site.

A copy of the entire database report dated November 17, 2011 is included in **Appendix B**.

5.2 FEDERAL CERCLIS/NFRAP LIST

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Information System (CERCLIS) database is a comprehensive listing of known or suspected uncontrolled or abandoned hazardous waste sites. These sites have either been investigated, or are currently under investigation by U.S. EPA for the release, or threatened release, of hazardous substances. The NFRAP sites are those where, following an initial investigation, no contamination was found, contamination was removed quickly, or the contamination was not serious enough to require action. No CERCLIS/NFRAP sites identified within a 0.5-mile radius of the Site.

5.3 RCRA CORRECTIVE ACTIONS AND ASSOCIATED TSD (CORRACTS)

The EPA maintains this database of RCRA facilities which are undergoing “corrective action”. A “corrective action order” is issued when there has been a release of hazardous waste or constituents into the environment from a RCRA facility. No CORRACTS sites were identified within a 1-mile radius of the Site.

5.4 FEDERAL RCRA TSD FACILITIES LIST

All facilities that transport, store, or dispose (TSD facilities) of significant quantities of hazardous waste, as determined by the Resource Conservation and Recovery Act (RCRA), are required to be tracked by U.S. EPA. No RCRA TSD facilities were identified within a 0.5-mile radius of the Site.

5.5 FEDERAL RCRA GENERATORS LIST

Facilities that generate hazardous waste are also tracked by RCRA. Depending on the amount of hazardous waste generated, these facilities are classified as small quantity generators (SQGs), large quantity generators (LQGs) or non-generators (NonGen). No SQGs, LQGs, or NonGen sites were identified within a 0.25-mile radius of the Site.

5.6 EMERGENCY RESPONSE NOTIFICATION SYSTEM (ERNS)

The EPA Office of Solid Waste Emergency Response Notification System (ERNS) database serves to store information on the sudden and/or accidental release of hazardous substances. Releases are recorded in ERNS when they are initially reported to the Federal government by any party. ERNS combines data from the National Response Center and the Marine Safety Information System. No ERNS facilities were identified within the applicable ASTM search distance.

5.7 GEORGIA HAZARDOUS WASTE SITES

Georgia Hazardous Waste Sites is a comprehensive listing of facilities which are deemed as potentially hazardous to the public health and welfare by the Georgia Environmental Protection Department (GA EPD). No Georgia Hazardous Waste Sites were identified within a 1-mile radius of the Site.

5.8 STATE SOLID WASTE LANDFILLS (SWLF)

No Solid Waste Landfills were identified within a 0.5 mile radius of the Site.

5.9 STATE LEAKING UNDERGROUND STORAGE TANKS (LUST)

The Leaking Underground Storage Tank (LUST) Report is a comprehensive listing of all registered leaking underground storage tanks (LUSTs, identified as the LUST database). This database was reviewed to identify LUST facilities within a 0.5-mile radius of the Site. There were four (4) LUST facilities (two (2) identified on the Site) identified within a 0.5-mile radius of the Site.

| Equal/Higher Elevation | Address | Distance (miles)/ Direction | EDR Map ID | EDR Pg |
|--------------------------------------------------------------|---------------------|--------------------------------|------------------|-----------|
| Northeast Georgia Regional Hospital (Fac ID# 10001273) | 1305 Redmond Circle | Target Property or Site | A2 | 7 |
| Northeast Georgia Regional Hospital (Fac ID# 00570021) | 1305 Redmond Circle | Target Property or Site | A3 | 8 |
| Zartic Incorporated | 432 Lavender Drive | 1/4 - 1/2 mile W | 5 | 10 |
| West Rome Dyehouse | 438 Lavender Drive | 1/4 - 1/2 mile W | 6 | 26 |

Based on a review of Georgia Environmental Protection Division's Underground Storage Tank Management Program (GAEPD USTMP) files for the on-site LUST sites, a "no further action required" (NFAR) status was issued for on-site Facility ID #10001273 on February 2, 2007. The LUSTs related to this release were located adjacent to Building 412. Interviews revealed that this was the location of a former convenience store that operated on the Property. USTMP's Corrective Action Unit (CAU) Project Officer, Ron Wallace, stated that his department is still awaiting submittal of a Corrective Action Plan-Part A (CAP-A) Completion Report for this facility ID.

Likewise, NFAR statuses were issued for three (3) releases associated with on-site Facility ID #00570021 on April 9, 1993; April 30, 1999; and July 17, 2000. The LUSTs related to these releases were located off of the northeastern corner of Building 920. Though an NFAR status was issued for each of the releases, there remains a potential for soil and or groundwater contamination as a result of the former LUSTs. Additionally, the on-site release that was located adjacent to Building 412 is still under corrective action; therefore this area is also considered a REC.

The Zartic Incorporated property, was noted as a LUST (Facility ID #0570129) which received NFAR status in 1999. The West Rome Dyehouse was noted as a LUST (Facility ID #09057044) which received NFAR status in 1993.

Due to the close proximity to the Property, the observed surface water feature that extends from the Zartic property to the east onto the Site and the current and historical use of these adjacent properties, they hold the potential for environmental impacts to the Subject Property.

5.10 REGISTERED STORAGE TANKS

The Georgia Underground Storage Tank Report is a comprehensive listing of all registered active and inactive aboveground and underground storage tanks located within the State of Georgia, (identified as the UST/AST database in the search report). These databases were reviewed to identify USTs/ASTs within a 0.25-mile radius of the Site. The target property is listed as a registered UST facility as a result of the active 2,500 gallon UST (gasoline) located off of the northeastern corner of the Maintenance Shop (Building 920). According to the EDR, the UST was installed at the Site in 1997. There are also two diesel ASTs located in the same proximity as this registered UST. These ASTs are 600 and 650 gallons and have been on Site since late 1990's. The 600 gallon AST has no secondary containment or emergency leak detection associated with it. The past and current operation of USTs in this area along with the two nearby diesel ASTs are considered a REC.

5.11 NON-HSI FACILITY

This database contains sites that have reported contamination of soil or groundwater under the Georgia Hazardous Site Response Act. Sites in the Non-HSI database were not placed on the Hazardous Site Inventory (HSI) because their hazardous evaluation scores did not exceed the threshold levels established for sites posing an imminent threat to human health or the environment. Two (2) properties plotted under the State Non-HSI Inventory within a 1-mile search radius of the Site.

| Equal/Higher Elevation | Address | Distance (miles)/ Direction | EDR Map ID | EDR Pg |
|-----------------------------|----------------------|--------------------------------|---------------|-----------|
| Carter Custom Carpets, Inc. | 671 Excelsior Street | ½ - 1 mile S | 7 | 28 |
| Tolbert Park | 3 Timothy Avenue | ½ - 1 mile ESE | 8 | 28 |

Due to their distance from the Site and current regulatory status, these facilities are not considered to be an environmental concern to the Site.

5.12 SUPPLEMENTAL STATE AND FEDERAL DATABASES

The Site is listed within two (2) supplemental environmental record databases: Financial Assurance and FUDS databases. The Site is listed in the Financial Assurance database based on qualifying for the Georgia Underground Storage Tank Trust (GUST) fund. The GUST fund provides reimbursements for past UST closures and system upgrades on qualifying properties.

The Site is also listed within the FUDS (Formerly Utilized Defense Sites) database. The Site is listed on the FUDS database due to its former utilization as a military hospital during the mid-1940s.

Neither of the above regulatory listings is cause for environmental concern as it relates to the Site, however it should be noted that the historical utilization of the property (including historic demolition and renovation activities, former operation of an on-site rail spur, former operation of six (6) former fuel oil ASTs from circa 1954 to 1993, and former operation of two (2) on-site incinerators), these specific past on-site activities should be considered a REC.

6.0 SITE RECONNAISSANCE

The Site reconnaissance was conducted on January 23-24, 2012 by Virginia M. Holland and Jason P. Chappell of Peachtree. The purpose of the Site reconnaissance was to make visual observations regarding current environmental conditions at the Site. In addition, adjacent properties were observed from the boundaries of the Site to evaluate potential off-site environmental concerns.

6.1 METHODOLOGY

Methods for conducting observations were consistent with ASTM and AAI Standards and included a review of accessible² areas of the Site. Peachtree has developed checklists for field personnel to use to ensure quality reporting and a complete investigation. A typical site reconnaissance includes walking the following:

- ▶ entire property boundary, where possible;
- ▶ each side of accessible roadways, paths, and wet/dry drainage pathways;
- ▶ perimeter of accessible on-site water bodies;
- ▶ interior and exterior of accessible buildings and improvements; and
- ▶ remaining accessible interior areas, using an approximate 100 foot grid pattern to survey these areas, where possible.

6.2 RECONNAISSANCE OBSERVATIONS

The following sections discuss the observations Peachtree made with respect to the possible hazards associated with the Site and the surrounding property. Peachtree personnel evaluated RECs and investigated the possible presence of potential site hazards in connection with the property as provided below. For each of the conditions identified on the Site, detailed information is provided. An opinion of the significance of the finding with regards to RECs is also discussed.

| Identified | Not Identified | Recognized Environmental Condition |
|------------|----------------|------------------------------------------------------|
| X | | use storage and disposition of hazardous substances |
| X | | underground and/or above ground storage tanks |
| | X | polychlorinated biphenyl (PCB) containing facilities |
| X | | solid waste management areas |
| | X | landfills |

²Accessible is defined as not obstructed by bodies of water, adjacent buildings or other obstacles. (ASTM E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process). Peachtree includes in this definition of "obstacles" vegetation or terrain which will not allow one to walk or drive unencumbered through the area.

| Identified | Not Identified | Recognized Environmental Condition |
|------------|----------------|-------------------------------------|
| X | | storm water management facilities |
| | X | wetlands |
| | X | flood plains |
| | X | asbestos-containing materials (ACM) |
| | X | radon |
| | X | lead-based paints |

In addition to the Site reconnaissance, Peachtree conducted a brief “drive-by reconnaissance” to determine the locations of nearby hazards and cultural resources.

6.2.1 Use Storage and Disposition of Hazardous Substances

Storage and/or disposal of hazardous substances was noted in the following locations as a result of the Site reconnaissance.

- Maintenance Shop (Building 920) and Equipment Shed (Building 921)* - Peachtree observed a paint booth and multiple containers of various paint products (including aerosol paint cans, paint thinners, wood stain, caulking and plasters). Multiple containers of various chemicals utilized for property maintenance (including oils, lubricants, gasoline, paint thinner, and oil/fuel mixture products) were observed in storage cabinets labeled “Flammable” or “Hazardous Chemicals”. A tripod setup, catch can, and associated spill pad utilized for parts cleaning was observed in the Maintenance Shop. Various waste containers marked “Danger - Hazardous Waste” were observed throughout the both buildings. Automotive batteries, an inactive oil pump supply system, a 55-gallon drum containing motor oil, a bulk used oil storage container (Lube Cube), and a parts cleaning pan situated on an empty 30-gallon drum was observed at the automotive servicing bay of the Maintenance Shop. A 55-gallon drum labeled “Ancool”, multiple bags of fertilizer and lime, an additional 55-gallon drum of motor oil and 30-gallon drum of lubricating oil was observed at the Equipment Shed. A gasoline underground storage tank (UST) and two (2) diesel above ground storage tanks (ASTs) were observed east and adjacent to both buildings (see further detail regarding UST and ASTs in Section 6.2.2).
- Building 809* - Peachtree observed multiple containers of paint and wood stainer in a storage cabinet inside the wood working shop.
- Energy (Steam) Plant (Building 902) and Chiller Plant (Building 911)* - Multiple 55-gallon drums and 1-gallon and 1-quart containers of various water treatment reagents were observed within both buildings. Material Data Safety Sheets (MSDSs) for these reagents were on file at the both facilities. Multiple containers of various cleaning supplies and chemicals utilized for property maintenance (including oils, lubricants,

gasoline, paints, paint thinner, and oil/fuel mixture products) were observed in a storage cabinet labeled "Flammable".

- *Maintenance Storage (Building 909)* - Peachtree observed various bags of fertilizer, gasoline, and motor oil associated with current grounds keeping activities.
- *Main Hospital (Building 103) and Lab/Pharmacy (Building 304)* - Peachtree observed various bio-medical supplies (including personal oxygen tanks, petri dishes, assay plates/slides, and laboratory chemicals) and various cleaning supplies in both buildings.
- *Bio-Hazard Storage (Building 304)* - Peachtree observed multiple containers labeled "Biohazard" staged for future disposal.

On-site personnel interviewed at the time of the Site visit indicated that all hazardous substances that were observed were either slated for appropriate on-site use for property maintenance or they (i.e. bio-hazards and lab chemicals) were slated for proper disposal by Stericycle.

6.2.2 Underground and Aboveground Storage Tanks

One (1) 2,500-gallon gasoline UST and two (2) diesel ASTs (600-gallon and 650-gallon) were observed at the Maintenance Shop (Building 920) during the site reconnaissance. The UST is noted to be of fiberglass, doubled walled construction and was installed in 1997. The 600 gallon AST is situated on a concrete pad with no observed containment structure. The 650 gallon AST is housed in a double walled containment system equipped with leak detection and emergency shut-off.

According to records, one (1) 5,000-gallon diesel UST, one (1) 550-gallon waste oil UST (associated with the former hydraulic lift system), and two (2) gasoline USTs (4,000-gallon and 2,000-gallon) were closed / removed from ground circa 1996-1997. Historical records indicate the Property was listed as a LUST site as a result of releases associated with these former USTs, however a NFAR status was issued for each of the releases (as presented in Section 5.9).

Nine (9) diesel ASTs, associated with the on-site emergency generators, were observed throughout the Site. Diesel fuel capacity for these generators range from 200-gallons to 612-gallons.

Three (3) 18,000-gallon propane ASTs, utilized as fuel for the Energy (Steam) Plant, were observed west and adjacent to the Energy Plant.

Based on a review of historical aerial photographs, six (6) former fuel oil ASTs (capacity unknown) were present in the approximate location of the current propane ASTs circa 1954 to 1993.

The past and current operations of the aforementioned ASTs and USTs at the Site is considered a REC.

6.2.3 Polychlorinated Biphenyl (PCB) Containing Facilities

Electrical transformers hold the potential for containing polychlorinated biphenyls (PCBs) in the dielectric fluid of some of the electrical units. Pad-mounted transformers are located throughout the Site. Pole-mounted transformers are present at the 1100 and 1200 housing areas. There were no signs of leakage (staining, oily deposits, etc.), staining, stressed vegetation, or other signs of impairment that were noted in association with the units observed on the Property.

6.2.4 Solid Waste Management Areas

The Georgia Comprehensive Solid Waste Management Act defines solid waste as different categories of waste which exist in solid form (household garbage, demolition material, land clearing debris, commercial non-hazardous waste material, etc.). A land clearing debris dumping area is located on northwestern portion of the Site. The debris consists of an wood scraps and mulch, concrete cinder blocks and planters, masonry bricks, and a spare tire.

A 20-yard roll-off dumpster utilized for storage of waste material to be recycled was observed between the Energy (Steam) Plant (Building 902) and Chiller Plant (Building 911).

As discussed in Section 6.2.1, containers labeled “Biohazard” were observed in the Bio-Hazard Storage (Building 903). The Bio-Hazard Storage building was formerly utilized as a incinerator for on-site waste. The incinerator has not been utilized in approximately 15 years. A concrete pad was observed adjacent to Bio-Hazard Storage and was formerly utilized to stage waste prior to incineration. Based on interviews and a review of historic documents, another incinerator was located at the Site, at the location of the former Energy Plant (between the current Energy (Steam) Plant and Chiller Plant).

As discussed in Section 6.2.1, various waste containers marked “Danger - Hazardous Waste” were observed throughout the Maintenance Shop (Building 920) and Equipment Shed (Building 921).

6.2.5 Landfills

Based on the Site’s former operation as a self-sustaining hospital campus, historic demolition activities, and past utilization of an on-site incinerator, there exists the potential that ash generated from historic incineration events may have been disposed of at the Site. Additionally, if land filling has occurred at the Property, there exists the potential for methane gas deposits beneath the subsurface.

6.2.6 Storm Water Management Facilities

Under the Clean Water Act and Georgia Law, operators of facilities that generate storm water discharges associated with industrial activity shall notify the appropriate agency and prepare a Storm Water Pollution Prevention Plan (SWPPP). As there are no current on-site industrial facilities generating storm water discharges, the storm water generated on site is primarily from sheet flow off paved concrete and asphalt areas. However, Peachtree did note that floor drains associated with staging area adjacent to the Bio-Hazard Storage (Building 903) and a floor drain within the Chiller Plant were routed directly to the adjacent tributary, rather than tied into a sanitary sewer. Peachtree recommends that these drain lines be rerouted to the

existing sanitary sewer.

No further investigations were performed by Peachtree concerning storm water management.

6.2.7 Wetlands

According to the Department of Interior's National Wetland Inventory database there are no designated wetland areas present on the Site (see EDR Report - Page A-3).

6.2.8 Flood Plains

A flood hazard map for Floyd County was reviewed. According to the FEMA database, there are no areas on the Site that appear to be located within a 100-year or 500-year designated flood hazard zone (see EDR Report - Page A-3 and Physical Setting Source Map).

6.2.9 Asbestos Containing Materials

Peachtree reviewed a May 2005 Final Report for Asbestos Abatement, prepared by GLE Associates, Inc. (GLE), concerning asbestos survey and abatement activities at the Site. According to the report, a limited asbestos survey (at suspect locations) indicated the presence of asbestos containing materials (ACMs) and subsequent asbestos abatement activities were performed at these locations. Other areas of the Property that were not included in these abatement activities could have ACMs present. A copy of the report is provided as **Appendix C**.

In regards to structures not yet surveyed or abated, Peachtree recommends an asbestos survey be conducted prior to demolition activities.

Please note that Peachtree did not conduct a formal asbestos survey as part of the assessment.

6.2.10 Radon

Radon is a radioactive gas that is generated by the decay of radium in the underlying soil and rocks. Radon gas levels are highly site specific and are influenced by soil and building conditions, including pressure differentials between the soil and the building. The U.S. EPA has established a guideline threshold of 4.0 picoCuries per liter (pCi/L) of air, above which there may be adverse health risks if exposure continued over a prolonged period of time.

Area radon information provided by the EDR indicates that the Floyd County area is designated by the U.S. EPA as Zone 2. Zone 2 has a potential for average indoor screening levels of radon greater than 4 picoCuries/Liter(pCi/L). The EDR report indicates that 14 sites were tested within the subject property Zip Code area (30316), and 93% of the first floor area was found to have less than 4 pCi/L, while 7% of the first floor area was found to have between 4 and 20 pCi/L. A 100% of the basement area was found to have less than 4 pCi/L. The second floor area measurements were not reported.

According a GLE letter report dated April 7, 2003, radon gas testing was performed at four residential structures (Buildings 1100, 1102, 1104, and 1106) on the Property in March 2003. Results indicated radon detections ranged from less than 3 pCi/L to 5 pCi/L. A copy of the

letter report is provided within **Appendix C**.

Radon sampling was not conducted as part of Peachtree's assessment.

6.2.11 Lead-Based Paints

The Consumer Products Safety Act (CPSA) restricted the amount of lead in paints manufactured after 27 February 1978. The Act restricted sale of lead in paints to be used in residences, schools, hospitals, parks, playgrounds, public buildings, and other areas where consumers have direct access to painted surfaces (non-industrial facilities). Due to the date of construction of some of the Site's structures being mid-1940s, lead-based paint may be a concern. Peachtree did not conduct a formal lead-based paint survey as part of the assessment.

7.0 INTERVIEWS

Peachtree interviewed/contacted the following people regarding the Site:

- ▶ GDBHDD: Mr. Richard Aghajanian, Director of Maintenance and Engineering
- ▶ GDBHDD: Mr. Jimmy Nelson, Lead Supervisor
- ▶ Georgia EPD USTMP: Ms. Gilda Knowles and Mr. Ronald Wallace
- ▶ GADNR - Wildlife Resources Division, Environmental Review Coordinator: Ms. Katrina Morris
- ▶ GDNR Underground Storage Tank Management Program: Ms. Kim Feagler
- ▶ Floyd County Fire Department

All parties were contacted by phone, via email or in person regarding the Site and asked if they were aware of any chemical spills, fires, unauthorized dumping of debris, or activities at the Site which could be of potential environmental concern. Details from these interviews are discussed below or in the appropriate sections of this report. Support documentation from these interviews is included in **Appendix D**.

7.1 CURRENT SITE MANAGER, OCCUPANTS, AND/OR OWNERS OF THE PROPERTY

Mr. Richard Aghajanian and Mr. Jimmy Nelson were present during Site reconnaissance activities. Mr. Aghajanian has worked at the Property for approximately three (3) years. Mr. Nelson has worked at the Property for approximately 30 years. Both individuals were interviewed by Peachtree during the Site reconnaissance activities and noted the former and current use of USTs and ASTs at the Property. Interviews revealed the former operation of a hydraulic lift system within the Maintenance Shop (Building 920) which was decommissioned and removed circa 1997 during UST closure activities (LUST Facility ID #0050070021) due to a leaking hydraulic tank. In addition, Mr. Aghajanian provided a “bird’s eye view” photograph of the Property from circa 1945 which depicts the former location of a incinerator and associated smoke stack. Mr. Aghajanian also stated that an Olympic size swimming pool was formerly located adjacent to the Laundry Building, on the western property boundary.

Regarding off-site RECs, both individuals noted the current and historic operations of the adjacent Zartec and West Rome Dyehouse facilities, as well as the former General Electric (GE) Medium Transformer Plant, located approximately 3/4 of a mile northwest of the Property. The former GE Plant is a known EPA Superfund site (Facility ID # GAD003308145) which has had confirmed releases of Polychlorinated Biphenyls (PCBs) to soil, groundwater, and surface water.

Besides the former and current operations of the on-site incinerators, hydraulic lift system, ASTs, and USTs at the Property and the off-site GE Plant, no additional environmental conditions and/or environmental liens or Activity Use Limitations (AULs) were noted during the Site reconnaissance interviews. Other pertinent information from the interviews is detailed in the appropriate sections of this report.

7.2 PAST OWNERS, OCCUPANTS, AND/OR OPERATORS OF THE PROPERTY

No past owners, occupants and/or operators of the Property were available for interview.

7.3 LOCAL GOVERNMENT OFFICIALS

The Floyd County Fire Department was contacted in regards to any possible reports of fire or hazardous materials on file for the Property. To date, Peachtree has not received a response from this department.

Ms. Gilda Knowles, representing the USTMP, was interviewed via email regarding the UST and LUST regulatory status of the Property and adjacent properties (Zartic Incorporated and Syntec Industries (Former West Rome Dyehouse). Mr. Ron Wallace, Corrective Action Project Officer for the GA USTMP, was also interviewed. Peachtree contacted Mr. Wallace regarding the on-site location of the two reported UST releases. Mr. Wallace confirmed the two locations of the former USTs and provided Peachtree with site maps to support. Further pertinent information from these interviews is provided in Section 5.0.

7.4 ADDITIONAL INTERVIEWS

Ms. Katrina Morris with the GA DNR Wildlife Preservation Division was contacted regarding any records of species of concern within the Property boundaries as required by GEPA. According to her review, Ms. Morris states that there are no records of species of concern at the Property. The GA DNR Wildlife Preservation Division correspondence is included in **Attachment 1**.

8.0 DATA GAPS

A data gap is defined by the ASTM Standard E1527-05 as “a lack or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information.” Data gaps may result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance and interviews.

8.1 IDENTIFICATION OF DATA GAPS

- ▶ No current owners or occupants of neighboring properties were available for interviews.
- ▶ Peachtree was not provided title search information for the Subject Property.

8.2 SIGNIFICANCE OF DATA GAPS

Peachtree’s interview with the current property owner and representatives and review of historical reports, aerial photographs, topographic maps and interviews with local government officials provided adequate historical and current information regarding the Site and surrounding properties; therefore, not being able to interview any current or previous owners or occupants of the neighboring properties is not considered a significant gap and is not likely to alter the conclusion of this report.

Peachtree requested title search information for the subject site, however, these documents were not made available. The inability to review title documents for ownership history is considered a significant data gap. Without the title documents it is unknown if there are any environmental liens and/or activity use limitations on the subject property or any significant easements other than those associated with the utility companies.

9.0 FINDINGS AND CONCLUSIONS

The environmental database (EDR Report) search revealed that there are eight (8) listings, including the Subject Property, with noted environmental matters within the designated ASTM search distances from the Site. The database search report also lists “unplottable sites” which are entries in the database that could not be specifically located (*i.e.* an incomplete address is listed). None of these sites were identified within the applicable ASTM Search distance.

Based on Peachtree’s review of available historical records and reports, interviews, agency records and our Site and area reconnaissance, Peachtree’s Phase I ESA concludes that there is evidence of potential historical on-site and off-site recognized environmental conditions (RECs). These RECs stem from both historic use of the Site, as well as off-site contaminants which could have migrated onto and adversely affected the Property. The RECs and recommendations for each are as follows:

1. The Property has two (2) listings as a LUST site in the EDR database. Based on USTMP records, no further action required (NFAR) status was granted relative to three confirmed releases; however, the USTMP is still awaiting a final CAP-A completion report. According to USTMP records, the former 5,000 gallon gasoline UST associated with LUST Facility ID#10001273 was located west and adjacent to Building 412. The three (3) former USTs associated with LUST Facility ID #00570021 were located adjacent to the Maintenance Shop (Building 920). The former USTs included two (2) gasoline (4,000 gallon and 2,000 gallon) USTs and one (1) 500-gallon waste oil UST (associated with the former hydraulic lift system). Though an NFAR status was issued for each of the releases, there remains a potential for soil and or groundwater contamination in these areas of the Property. **Recommendation:** Peachtree recommends soil and groundwater sampling in these areas in order to determine if the Site has been impacted by petroleum related constituents.
2. The Property is listed as a Formerly Used Defense Site (FUDS) in the EDR database, as a result of its former operation as Battey General Hospital. Based on the historical use of the Property as a self-sustaining hospital campus (including historic demolition and renovation activities, former operation of an on-site rail spur, former operation of six (6) former fuel oil ASTs from circa 1954 to 1993, and former operation of two (2) on-site incinerators), these specific past on-site activities should be considered a REC.

In addition, there exists a potential that historic land filling activities (utilizing on-site incinerator ash and/or demolition debris) may have adversely impacted the Property. Interviews revealed that an area southwest of Building 919 (laundry building) previously contained an Olympic-sized swimming pool. This area was back filled with unknown fill and there exists the potential for methane gas deposits beneath the subsurface. **Recommendation:** Peachtree recommends conducting soil and potentially groundwater sampling in these areas to determine if these historic on-site activities have impacted the Property.

3. An asbestos survey and subsequent abatement was performed by GLE Associates, Inc. (GLE) at the Property from 2003 to 2005. Based on Peachtree's review of the May 2005 Final Report for Asbestos Abatement, a limited survey and abatement was conducted at multiple structures at the Property. **Recommendation:** Peachtree recommends that, if demolition or renovation is to be conducted at any additional structures not previously surveyed or abated on the Property, full asbestos and lead paint surveys be conducted to locate any potential ACMs. In the event that ACMs are found, proper abatement should be conducted.
4. **Recommendation:** Peachtree recommends implementing best management practices (BMPs) regarding the disposal of any unused paint and petroleum products, cleaning supplies, and laboratory/bio-medical waste observed at the Property. Note: On-site personnel have indicated that all hazardous substances are either slated for appropriate on-site use for property maintenance or they were slated for proper disposal by Stericycle.
5. Two western adjacent facilities, Zartic Incorporated and West Rome Dyehouse are reported as previously containing leaking USTs. Due to the close proximity to the Property, the observed surface water feature that extends from the Zartic property to the east onto the Site and the current and historical use of these adjacent facilities, the activities at these two facilities have the potential for having had environmental impact to the Subject Property.

The former General Electric (GE) Medium Transformer Plant is located approximately 3/4 of a mile northwest of the Property. The former GE Plant is a known EPA Superfund site (Facility ID # GAD003308145) which has had confirmed releases of Polychlorinated Biphenyls (PCBs) to soil, groundwater, and surface water. Due to the proximity to the Property, this former facility represents an off-site REC.

Recommendation: Peachtree recommends conducting soil, groundwater, surface water and sediment sampling on the western region of the Property to determine if the three off-site facilities (Zartic, West Rome Dyehouse and GE) have impacted the Property through their historic and current operations.

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-05 of the Northwest Regional Hospital Facility Property, Rome, Floyd County, Georgia. Any exception to, or deletions from, this practice are described in Section 2.3 of this report.

10.0 QUALIFICATIONS OF PEACHTREE PROJECT PERSONNEL

Appendix E contains resumes of all Peachtree project personnel that worked on this project.