



November 27, 2013

North Carolina Department of Environment
and Natural Resources
Division of Waste Management – DSCA Program
401 Oberlin Road, Suite 150
Raleigh, NC 27605-1350

Att: Mr. Billy Meyer
DSCA Project Manager

Re: **FINAL Risk Management Plan**
Cleaner Image - DSCA Site ID #41-0001
4711 Lawndale Drive
Greensboro, Guilford County, North Carolina

Dear Mr. Meyer:

URS Corporation – North Carolina (URS) is pleased to provide the attached Draft Risk Management Plan (RMP) for the Cleaner Image site located at 4711 Lawndale Drive, Greensboro, North Carolina. A risk assessment conducted for the site indicates that contaminant concentrations at the site do not pose an unacceptable risk. The primary purpose of this RMP is to ensure that the assumptions made in the risk assessment remain valid in the future. Based on the documentation outlined in this report, URS recommends issuance of a No Further Action letter for the site.

If you have any questions or require additional information, please do not hesitate to contact either Rob MacWilliams or Dhara Trivedi at 704.522.0330.

Sincerely,

URS CORPORATION-NORTH CAROLINA

Dhara Trivedi
Project Manager

Robert H. MacWilliams, PG
Program Manager

URS Corporation – North Carolina
6000 Fairview Drive, Suite 200
Charlotte, North Carolina 28210
(704) 522-0330 Phone
(704) 522-0063 Fax

D R A F T

**Risk Management Plan
Cleaner Image - DSCA Site ID # 41-0001
4711 Lawndale Drive
Guilford County
Greensboro, North Carolina 28540**

Submitted To:
NC Department of Environment and Natural Resources
Division of Waste Management – DSCA Program
401 Oberlin Road, Suite 150
Raleigh, NC 27605-1350



Dhara Trivedi
Project Manager



Robert H. MacWilliams, PG
Program Manager
N.C. Professional Geologist #2110

URS

URS Corporation-North Carolina
6000 Fairview Drive, Suite 200
Charlotte, North Carolina 28210

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
1.0 INTRODUCTION	1
2.0 OBJECTIVES OF RMP	1
3.0 SUMMARY OF APPROVED RISK ASSESSMENT REPORT	2
4.0 RAP COMPONENTS	4
4.1 Summary Of Prior Assessment And Interim Actions.....	4
4.2 Remedial Action	7
5.0 DATA COLLECTED DURING RMP IMPLEMENTATION	9
6.0 LAND-USE RESTRICTIONS (LUR)	9
7.0 LONG-TERM STEWARDSHIP PLAN	9
8.0 RMP IMPLEMENTATION SCHEDULE.....	10
9.0 CRITERIA FOR DEMONSTRATING RMP SUCCESS	10
10.0 CONTINGENCY PLAN IF RMP FAILS.....	10
11.0 CONCLUSIONS AND RECOMMENDATIONS	11

APPENDICES

- Appendix A Documentation of Plume Stability Evaluation
- Appendix B Level 1 Ecological Risk Assessment Checklists
- Appendix C Notices of Dry-Cleaning Solvent Remediation (NDCSRs)
 - Appendix C-1 : NDCSR for the Source Property (K. H. Portfolio I, LLC)
 - Appendix C-2 : NDCSR for the Off source Property (NCDOT)
- Appendix D Annual DSCA Land-Use Restrictions Certifications
- Appendix E Notice of Intent
- Appendix F Example Documents Announcing Public Comment Period

1.0 INTRODUCTION

URS Corporation – North Carolina (URS) has prepared this Risk Management Plan (RMP) to address dry-cleaning solvent contamination associated with the Cleaner Image site (DSCA Site #41-0001) on behalf of the North Carolina Department of Environment and Natural Resources (NCDENR) Dry-Cleaning Solvent Cleanup Act (DSCA) Program. The contiguous area of dry-cleaning solvent contamination associated with the Cleaner Image site located at 4711 Lawndale Drive, Guilford County, Greensboro, North Carolina, will be referred to herein as the “site”. Site assessment activities have confirmed that contamination does extend onto adjacent properties. The site location is shown on the attached **Figure 1**. This RMP is intended to comply with the requirements of the DSCA (N.C.G.S. 143-215.104A et seqs) and promulgated rules, and follows the outline provided in the DSCA Program’s Risk-Based Corrective Action (RBCA) guidance.

2.0 OBJECTIVES OF RISK MANAGEMENT PLAN

URS has completed soil assessment activities at the site which indicated tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE) and trans-1,2-dichloroethene (trans-1,2-DCE) soil impacts exist above unrestricted land use standards. Additionally, groundwater assessment activities were completed at the site and indicated that PCE, TCE, cis-1,2-DCE, trans-1,2-DCE, vinyl Chloride (VC) and benzene groundwater impacts exist at the site at levels exceeding the Title 15A NCAC 2L .0202 Groundwater Standards (2L Standards). Vapor intrusion assessment activities were completed at the site and indicate chlorinated solvent impacts in sub slab vapor and indoor air for the onsite exposure unit and in soil gas for the offsite #1 exposure unit. A figure depicting the locations of the exposure units evaluated as part of the risk assessment process is included as **Figure 2**.

URS completed a Risk Assessment at the site and adjacent property in accordance with the DSCA Program’s risk assessment procedures in May 2013. The results of the Risk Assessment indicated that there are on-site risks that do exceed target levels. However, these risks will be managed by a RMP which will institute site-specific land-use restrictions selected as part of the risk assessment evaluation. Thus, the objective of the RMP is to ensure that those site-specific land-use conditions remain valid in the future.

3.0 SUMMARY OF RISK ASSESSMENT REPORT

As documented in the following reports (Prioritization Assessment Report, dated December 2007, Groundwater Monitoring Report, dated February 2010, Excavation Report, dated August 2009 and Vapor Report, dated May 2010) investigation activities completed to date have indicated the presence of soil contaminants, groundwater contaminants, and/or soil gas contaminants on the site property (on-site exposure unit and off-site exposure unit #1) above unrestricted land-use standards. As such, URS performed a risk assessment to address applicable exposure pathways based on the identified impacts. The results of the risk assessment are documented in the Risk Assessment Report for Cleaner Image, dated May 2013.

The site is currently zoned as commercial property. To be protective of unknown property zoning in the future, the risk assessment was completed to assume that the site could be rezoned in the future as residential property. Subsequently, both residential and commercial scenarios were considered as part of the risk assessment.

The first step in the risk assessment process consisted of evaluating exposure pathways for two separate exposure units: the On-Site Exposure Unit and Off-Site Exposure Unit #1. Exposure units are shown on **Figure 2**. The exposure model evaluation indicated the following complete exposure pathways for the On-Site Exposure Unit, and Off-Site Exposure Unit #1:

On-Site Exposure Unit

- **Surface Soil Exposure** – Impacted surface soil is present making a complete exposure pathway. Surface soil exposure was evaluated for current conditions (commercial property), future conditions (residential and commercial properties) and construction worker.
- **Indoor Inhalation of Vapor Emissions from Soil** – Impacted soil is present making a complete exposure pathway. Indoor inhalation of vapor emissions was evaluated for current conditions (commercial property) and future conditions (residential and commercial).
- **Indoor Inhalation of Vapor Emissions from Groundwater** – Impacted groundwater is present making a complete exposure pathway. Indoor inhalation of vapor emissions was evaluated for current conditions (commercial property) and future conditions (residential and commercial).

- **Outdoor Inhalation of Vapor Emissions from Soil** - Impacted soil is present making a complete exposure pathway. Outdoor inhalation of vapor emissions was evaluated for current conditions (commercial property), future conditions (residential and commercial properties), and construction worker.
- **Outdoor Inhalation of Vapor Emissions from Groundwater** - Impacted groundwater is present making a complete exposure pathway. Outdoor inhalation of vapor emissions was evaluated for current conditions (commercial property), future conditions (residential and commercial properties), and construction worker.

In lieu of representative concentrations, the most elevated soil, groundwater, soil gas and/or indoor air concentrations observed at the site were used in the risk assessment for the On-Site Exposure Unit. Site specific Domenico groundwater modeling results indicate exceedances of site specific target levels (SSTLs) for both source soil and source groundwater with respect to the following points of exposure:

- (1) the first property located directly down gradient from the groundwater plume on which impacts have not been observed and is located 170 feet distance from the (soil/groundwater) source; and,
- (2) The Richland Creek at which surface water impacts have not been observed and is located 150 feet distance from the (soil/groundwater) source.

Contrarily, our evaluation of site groundwater conditions indicates that plume has not migrated as far as the Domenico groundwater modeling projects. Some of the modeling inputs are conservative parameters, specifically the rate of infiltration which may not be representative of the current land cover (i.e. asphalt, concrete). Such land cover would reasonably minimize infiltration in the source area and likely affect the documented plume migration at the site. However, because rate of infiltration is a significant variable in the leaching of contamination from soil and subsequent migrating in groundwater, it is reasonable that plume expansion would occur as indicated by the model in the event that site conditions were altered such that infiltration rates increased in the area of source contamination. Therefore it is recommended that land use controls be utilized to maintain current infiltration conditions in the areas of impacted soils where contaminant concentrations exceed the SSTL as depicted in **Figure 3**.

The On-Site Exposure Unit passed for current complete exposure pathways. However, it exceeded the risk limits for the indoor air exposure pathway for both residential and commercial exposure in the future based on soil gas data, and the risk limits for the surficial soil exposure

pathway for residential exposure in the future. The indoor air exposure pathway can be addressed through the imposition of land-use restrictions specific to the consideration of vapor mitigation measures in respect to future property development. To address the surficial soil exposure pathway, the imposition of land-use restrictions which limit the property to future commercial use should be implemented.

Finally, land-use restrictions should be implemented on the property to prevent future installation of water supply wells within the area of concern due to groundwater contaminant concentrations above the 2L Standards.

Off-Site Exposure Unit #1

- **Indoor Inhalation of Vapor Emissions from Groundwater** – Impacted groundwater is present making a complete exposure pathway. Soil gas data was used for the risk assessment evaluation. Indoor inhalation of vapor emissions was evaluated for current conditions (commercial property) and future conditions (residential and commercial).
- **Outdoor Inhalation of Vapor Emissions from Groundwater** - Impacted groundwater is present making a complete exposure pathway. Outdoor inhalation of vapor emissions was evaluated for current conditions (commercial property), future conditions (residential and commercial properties), and construction worker.

In lieu of representative concentrations, the most elevated groundwater and soil gas concentrations observed at the site were used in the risk assessment for the Off-Site Exposure Unit #1. The Off-Site Exposure Unit #1 passed for current and future complete exposure pathways considering both residential and commercial development. However, as groundwater contaminant concentrations are above the 2L Standards, land-use restrictions should be implemented on the property to prevent future installation of water supply wells within the area of concern.

4.0 REMEDIAL ACTION PLAN

4.1 Assessment Activities and Interim Actions

The site property is a 1.25-acre parcel at the corner of Lawndale Drive and Cotswold Avenue. The building consisted of a Laundromat, vacant space, pizzeria, accounting office, and Mahi's seafood grill restaurant. The dry-cleaning facility was reported in operation from 1987 to 2000.

The former location of the dry-cleaning facility is currently a vacant space. The facility was operated by Don & Carla Blaine from 1987 to 1994, Ed Chapman from 1994 to 1995, and then Moody Management Group, Inc. until 2000. One 30-pound capacity dry cleaning machine was reportedly located on the site from 1987 to 2000.

A Phase I was completed on the Lawndale Village site on May 13, 1997 by Earth Management Systems, Inc (EMS) of Columbia, SC. The Phase I concluded that Cleaner Image was a recognized environmental concern (REC) and necessitated further investigation. Subsequent assessment activities in May and June 1997 included the installation and sampling of four (4) temporary GeoProbe monitoring wells. Analytical results indicated the presence of tetrachloroethene (PCE) and trichloroethene (TCE) in the groundwater at concentrations above the NCDENR 2L groundwater standards.

The direction and gradient of groundwater flow beneath the site was not established as part of the initial assessment activities; however, based on the location of the Richland Creek in respect to the site, it was inferred that groundwater flow was towards the northwest. Upon confirmation of a release the current property owner, Moody Management Group, Inc., submitted a petitioner questionnaire on September 2002 to request admittance of the site into the DSCA Program. The site was accepted in to the program on January 7, 2004 and an Assessment and Remediation Agreement was executed. According to information documented in the petition the former owner dumped waste water and PCE residue on the asphalt out the back door. The current property owner is Kotis Properties, Inc. /K H Portfolio I, LLC.

Initial assessment activities executed by URS were conducted on August 1, 2007, and August 13 to 15, 2007, which included the advancement of five (5) soil borings inside the former dry-cleaning facility to evaluate potential contaminant source areas. Soil samples were collected and submitted for laboratory analysis of volatile organic compounds (VOCs) by EPA Method 8260. Based on a review of the soil data, the soil source impacts appear to be located in the vicinity of the former dry cleaning machine. URS also collected one surface water sample and four in-situ pore water samples from Richland Creek, approximately 300 feet down gradient of the site. The surface water sample did not indicate chlorinated solvent constituents above the laboratory method detection limits. URS also installed six (6) Type II monitoring wells (MW-1 through MW-6) between August 13 to 15, 2007. The purpose of the monitoring wells was to evaluate the groundwater quality beneath the site. Following installation and development of newly installed wells and purging of existing wells, URS collected groundwater samples from the wells and submitted the samples for laboratory analysis of VOCs by EPA Method 8260. The maximum

concentrations of PCE and TCE detected during initial site activities were 1,030 micrograms per liter (ug/L) and 311ug/L, respectively. In accordance with DSCA Bulletin #30, URS collected two indoor air samples (one from the former dry cleaning tenant space and one from the laundromat area) and one ambient air sample in the former Cleaner Image facility on November 3, 2009. URS also collected two sub-slab vapor samples from beneath the former Cleaner Image facility on November 4, 2009. A Vapor Quality report containing the results was submitted to DSCA on February 2, 2010. Based on the results from the initial indoor air and sub-slab vapor sampling activities and discussions between URS and DSCA, confirmatory samples were to be collected for indoor/ambient air and sub-slab vapor. URS collected confirmatory ambient air and indoor air samples from the former dry cleaning tenant space and the laundromat area on February 18, 2010. On February 19, 2010, URS deployed Radiello passive diffusion indoor air samplers for 14 days in the former dry-cleaning area and the laundromat area. The cumulative carcinogenic risk from the above indoor air samples was less than 1E-05.

Following URS' first round of assessment activities, further assessment was required to delineate soil and groundwater impacts from dry cleaning operations at the site. On July 7 to 11, 2008, and July 14, 2008, URS advanced 17 soil borings inside and immediately outside the former dry cleaning facility. URS also collected two (2) soil gas samples near the residences of the Hedges Apartment complex located behind the former dry cleaning business. URS also installed five (5) additional Type II monitoring wells and one (1) deep, Type III monitoring well to assess the lateral and vertical extent of groundwater impacts at the site.

On December 14, 2007, URS submitted a Prioritization Assessment Report (PAR) to the DSCA Program, outlining the details of the initial assessment activities. Also included in the PAR were specifics related to a site reconnaissance and receptor survey. As documented in the PAR, assessment activities initially completed indicated that the extent of impacted groundwater was adequately delineated in respect to applicable screening levels and the constituents of concern at the site were identified to be PCE, TCE, cis-1,2-DCE, and trans-1,2-DCE. An Air Quality Evaluation Results report, dated May 19, 2010, documented all vapor and indoor air assessment activities completed at the site. As documented in the May 19, 2010 report, vapor/indoor air results indicated no exceedances of indoor air risk screening levels during the sampling event completed in February 2010.

As groundwater was adequately delineated at the site, URS began quarterly monitoring of the existing monitoring wells MW-1, MW-2, MW-3, MW-4, MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, and DMW-1. The results of the sampling events are documented in the

Groundwater Monitoring Report submitted to the DSCA Program on December 11, 2009, which concluded that contaminant plume stability was demonstrated.

A preliminary review of the comprehensive soil quality data in respect to the site specific exposure model indicated that surficial soils (0-3 ft.) exceeded the representative risk based screening levels for PCE. A surficial soil source removal action from 0 to 3 feet was conducted on April 9, 2009, and an Excavation Report was submitted to DSCA Program on August 11, 2009, which detailed the excavation activities conducted at the site.

As soil, groundwater, and vapor/indoor air assessment activities were completed at the site, URS completed a Risk Assessment Report for the site in May 2013. As discussed in detail in Section 3.0, the risk assessment concluded that risks associated with the contamination at the site could be managed through implementation of land-use controls as detailed in this RMP. Therefore, the risk assessment recommended risk-based closure for the site. The purpose of this RMP is to ensure that the assumptions made in the risk assessment remain valid in the future.

4.2 Remedial Action

According to the DSCA Program's RBCA guidance, no remedial action is necessary if the following four site conditions are met:

- (i) the dissolved plume is stable or decreasing;
- (ii) the maximum concentration within the exposure unit for every complete exposure pathway of any COC is less than ten times the RC of that COC;
- (iii)adequate assurance is provided that the land-use assumptions used in the DSCA Program's RBCA process are not violated for current or future conditions; and,
- (iv)there are no ecological concerns at the site.

The subject site's compliance with the four above referenced conditions confirms that the contaminant concentrations are not likely to pose an unacceptable risk either at present or in the future and remedial action at the site is not required. Each of these conditions and their applicability to the subject site are summarized in the following section.

4.2.1 Condition 1 – The Dissolved Plume is Stable or Decreasing

The stability of the plume was assessed as part of groundwater monitoring events completed in September 2008, January 2009, April 2009, July 2009 and November 2011 at monitoring wells

MW-1, MW-2, MW-3, MW-4, MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, and DMW-1.

URS prepared a concentration versus distance graph for sampling events conducted at the site, which is included in **Appendix A**. As indicated on the graph, PCE concentrations in the groundwater samples collected from monitoring well MW-3, MW-4 and MW-5 appear to be generally stable over the sampling events completed at the site to date. No COC was detected above 2L Standards in groundwater samples collected from down gradient monitoring well MW-10 or up gradient monitoring well MW-7 during any of the groundwater sampling events. Based on this data, URS concludes that the size of the plume is stable and concentrations in the source area are likely to remain generally stable.

Documentation of the plume stability evaluation, including a figure showing monitoring well locations, a table showing historical groundwater analytical data, and a concentration versus distance graph is included in **Appendix A**.

4.2.2 Condition 2 – The Maximum Concentration within the Exposure Unit for Every Complete Exposure Pathway of any COC is Less Than Ten Times the RC of that COC

Representative concentrations (RCs) were not calculated as part of the risk assessment for this site. Instead, a more conservative approach was utilized by using the maximum concentration for each COC within each exposure unit. Hence, this condition has been met for each COC and exposure pathway for the site.

4.2.3 Condition 3 – Adequate assurance is provided that the land-use assumptions used in the DSCA Program’s RBCA process are not violated for current or future conditions.

The risk assessment completed for the site and adjacent property was based on current land-use conditions being commercial. However, using the most conservative approach, future conditions at the site were considered to be residential. As discussed in Section 6.0, land use restrictions (LURs) will be implemented for the site to ensure that these assumptions remain valid.

4.2.4 Condition 4 – There are no ecological concerns at the site.

URS completed a Level 1 Ecological Risk Assessment for the site in accordance with the DSCA Program’s RBCA guidance. The results of the evaluation indicate that the release does not pose

an unacceptable ecological risk. The completed Level 1 Ecological Risk Assessment Checklists A and B and associated attachments are included in **Appendix B**.

The site's compliance with the four above referenced conditions confirms that the contaminant concentrations are not likely to pose an unacceptable risk either at present or in the future. The plume is expected to naturally attenuate over time and the appropriate remedial action is to implement appropriate LURs on the properties where soil and/or groundwater contamination is present.

5.0 DATA COLLECTED DURING RMP IMPLEMENTATION

No further sampling or other data collection activities are proposed for the site or adjacent property as long as the assumptions detailed in the NDCSR's remain valid. Thus, this section is not applicable.

6.0 LAND-USE RESTRICTIONS

The risk assessment conducted for the site was based on assumptions that usage of the property is currently commercial and future use could potentially be residential. LURs will be implemented for the site to ensure that land-use conditions are maintained and monitored until the LURs are no longer required for the site. A Notice of Dry-Cleaning Solvent Remediation (NDCSR) was prepared for the site to comply with the LUR requirement. The NDCSR is included in **Appendix C**. Refer to the NDCSR for the specific language to be incorporated to address each of the risk assessment assumptions.

Plats showing the locations and types of dry-cleaning solvent impacts on the site are included as exhibits to the NDCSRs. The locations of dry-cleaning solvent impacts are where contaminants have been detected above unrestricted use standards. As discussed in Section 4.1, PCE is the primary COC for the site.

7.0 LONG-TERM STEWARDSHIP PLAN

The NDCSR contains a clause which requires the owner of the site to submit a notarized "Annual DSCA Land Use Restrictions Certification" to NCDENR on an annual basis certifying that the NDCSR remains recorded with the Register of Deeds and that land-use conditions have

not changed. An example of such a notice is included in **Appendix D**. Documents relating to this site will be maintained by NCDENR and will be available for public access.

8.0 RMP IMPLEMENTATION SCHEDULE

Since the groundwater plume is stable and confined to the site property, and potential exposure to the impacts is managed through the NDCSR and LURs, no additional site remediation activities are required to implement the RMP. A 30-day public comment period will be held to give the community an opportunity to comment on this proposed strategy. **Appendix E** includes a public notice to be submitted in the local newspaper for the initiation of the public comment period. **Appendix F** includes example documents used to encourage the public comment period in the local newspaper and to inform local officials, nearby property owners and interested parties. Following completion of the public comment period and final approval of the RMP, the NDCSRs will be filed with the Guilford County Register of Deeds and will complete the RMP schedule.

9.0 CRITERIA FOR DEMONSTRATING RMP SUCCESS

The RMP will be successfully implemented once the required LURs have been executed and recorded with the Guilford County Register of Deeds. The NDCSRs may, at the request of the property owner, be canceled by NCDENR after risk to public health and the environment associated with the dry-cleaning solvent contamination and any other contaminants included in the dry-cleaning solvent assessment and remediation agreement has been eliminated as a result of the remediation of the property. If NCDENR is notified of a change in site conditions, per the notification requirements detailed in the NDCSRs, the RMP will be reviewed to determine if the site conditions have impacted the requirements set forth in the NDCSRs and LURs and if changes are required. Enforcement of the RMP will be maintained through receipt of the “Annual DSCA Land-Use Restrictions Certification” from the property owners as part of the NDCSR and LUR requirements.

10.0 CONTINGENCY PLAN IF RMP FAILS

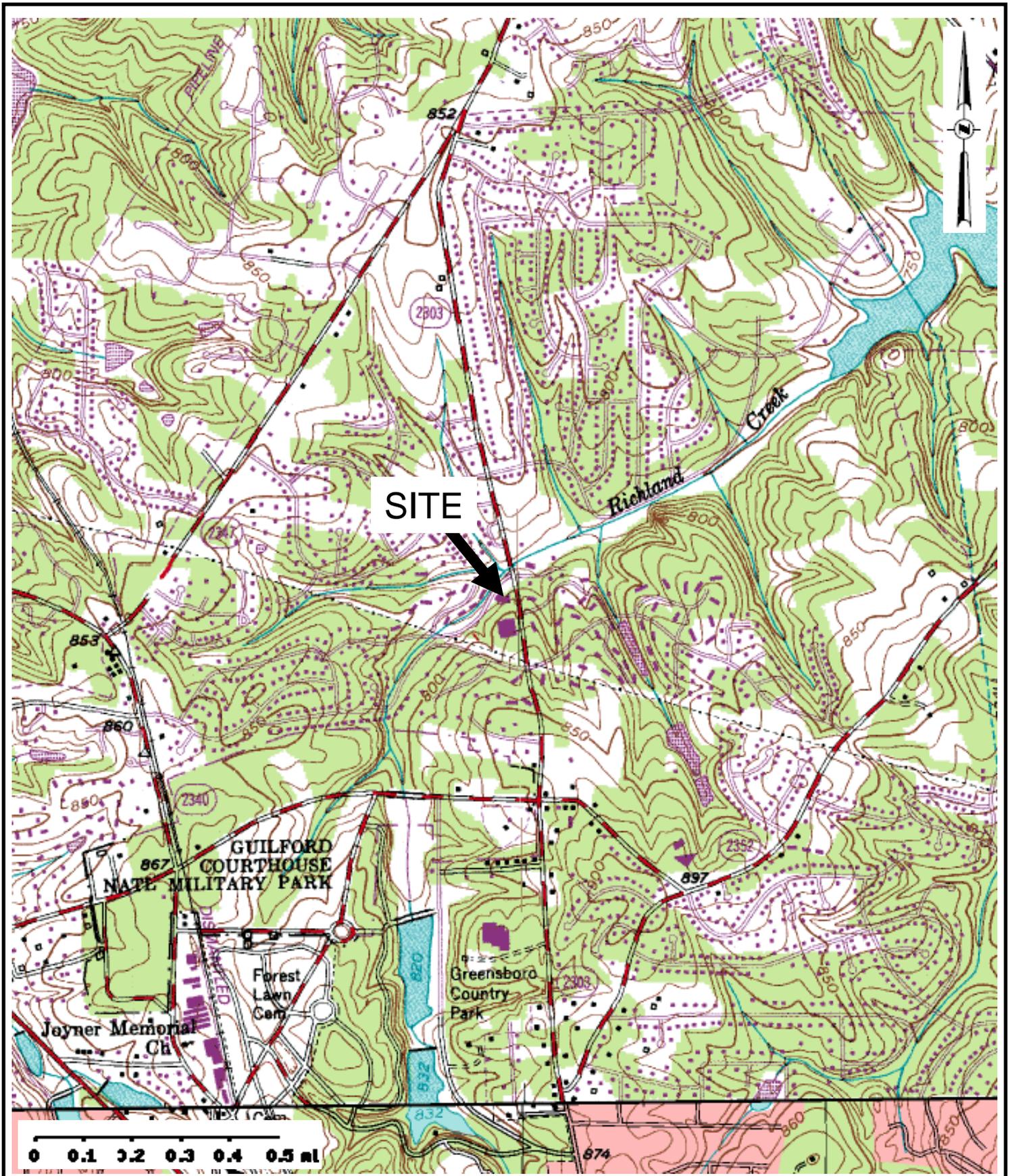
As discussed above, unless the DSCA Program is notified of a change in land-use conditions at the subject site, per the notification requirements detailed in this plan, the RMP will remain in

effect until the RMP has met its objectives and is considered a success. Pursuant to N.C.G.S. 143-215.104K, if any of the LURs set out in the NDCSR are violated, the owners of the properties at the time the LURs are violated, the owner's successors and assigns, and the owner's agents who direct or contract for alteration of the site in violation of the LURs, shall be held liable for the remediation of all contaminants to unrestricted use standards.

11.0 CONCLUSIONS AND RECOMMENDATIONS

URS has prepared this RMP for the subject property on behalf of the DSCA Program. The results of the risk assessment completed for the site indicate that contaminant concentrations at the site do not pose an unacceptable risk. The contaminant plume associated with the site appears stable and/or decreasing. This RMP specifies that the NDCSR and LUR requirements provide notification that land-use conditions observed during the risk assessment evaluation remain valid in the future. Based on the documentation contained in this report, URS recommends issuance of a "No Further Action" letter.

FIGURES



Reference: 7.5 Minute USGS Topographic Map: Lake Brandt, North Carolina (1991)



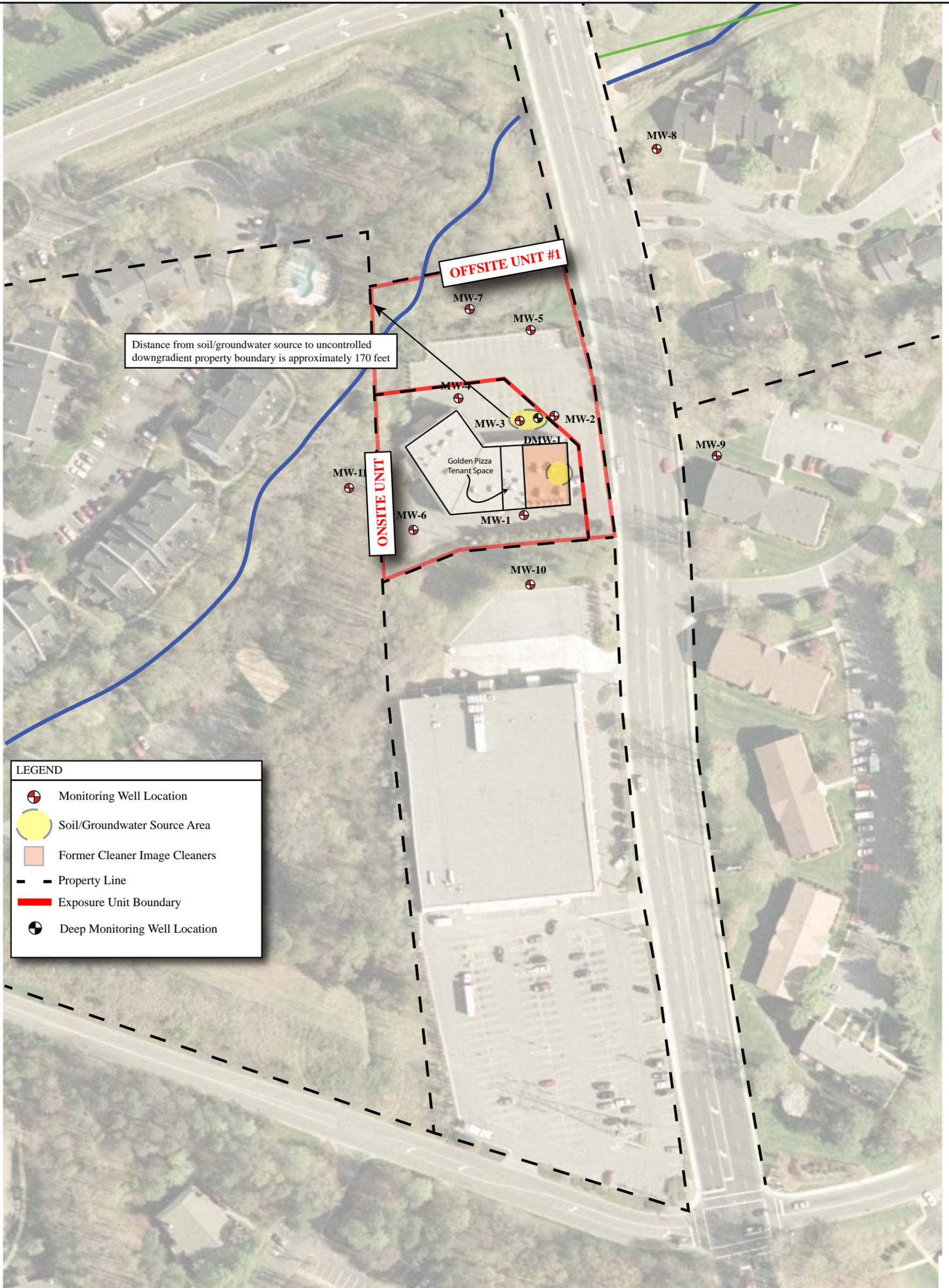
URS CORPORATION – NORTH CAROLINA
 TWO SOUTH EXECUTIVE PARK
 6135 PARK SOUTH DRIVE, SUITE 300
 CHARLOTTE, NC 28210
 TEL: (704) 522-0330
 FAX: (704) 522-0663



Site Location Map
 Former Cleaner Image
 4711 Lawndale Drive
 Greensboro, North Carolina
 DSCA Site ID #41-0001

DRAWN BY: C.J.L. - 8/31/07
 CHECKED BY: K.M.M. - 9/1/07
 PROJECT NO: 38854410

SHEET
 Att. 1



LEGEND	
	Monitoring Well Location
	Soil/Groundwater Source Area
	Former Cleaner Image Cleaners
	Property Line
	Exposure Unit Boundary
	Deep Monitoring Well Location



LEGEND

- Property Line
- Former Cleaner Image
- Area of soil impacts above SSTL
- Exposure Unit Boundary
- Soil Sample Location advanced in August 2007
- Soil Sample Location advanced in July 2008
- Soil Sample Location from excavation in April 2009

PCE - Tetrachloroethene
TCE - Trichloroethene
cis-1,2 DCE - cis-1,2-Dichloroethene
trans-1,2 DCE - trans-1,2-Dichloroethene
mg/kg - milligrams per kilogram

Red highlighted text indicates concentrations used in GSI Risk Assessment Model.

COCs used in Risk Assessment Model include:
Onsite Unit: Benzene, PCE, TCE, cis-1,2-DCE, trans-1,2-DCE
If COC is not shown, it was not detected above the method detection limit (MDL) in a particular sample
BDL - Below Laboratory Detection Limits

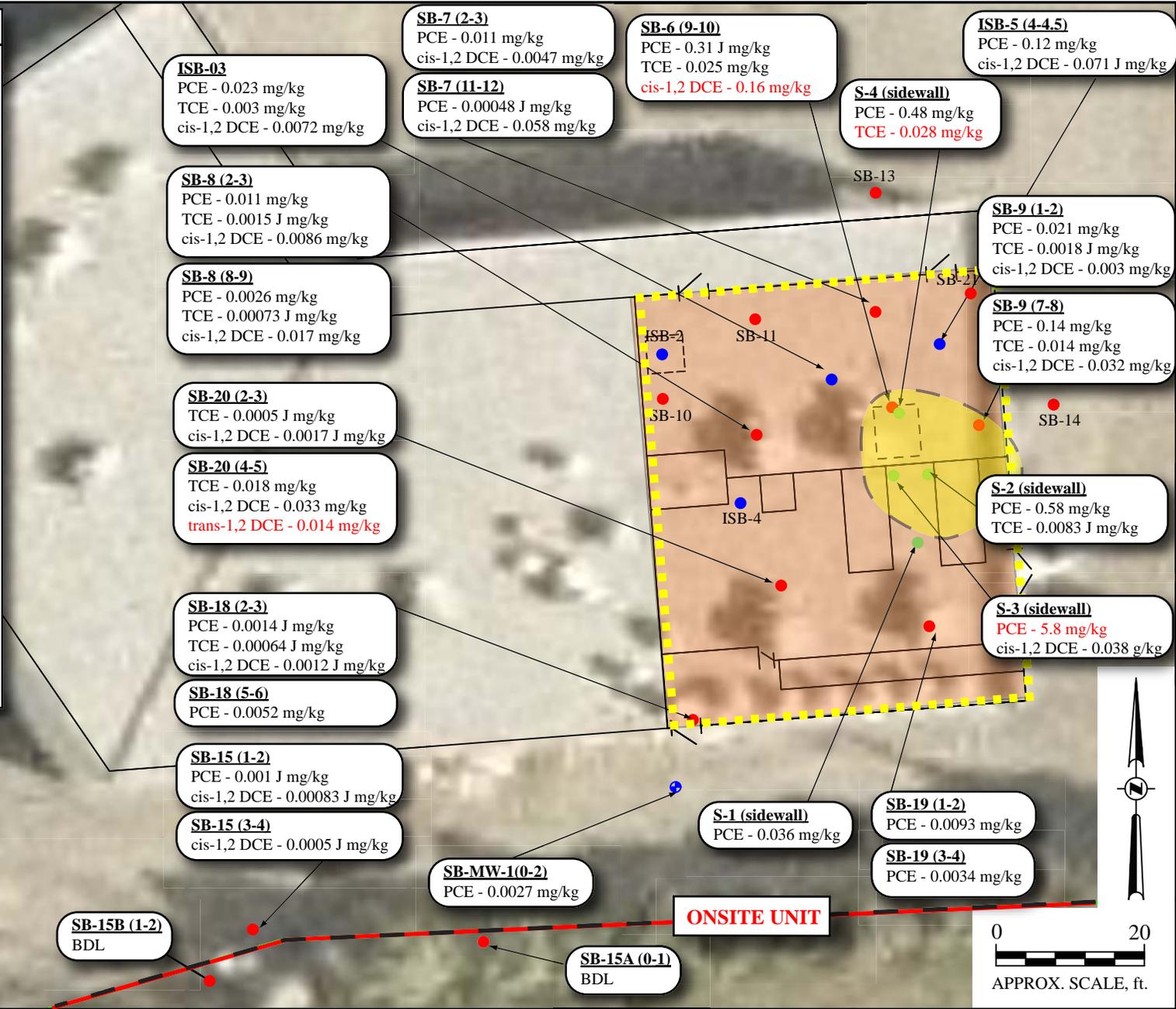


Fig. 3

DRAWN BY:
CNT - 01/31/13

CHECKED BY:
RHM - 11/5/08

PROJECT NO.:
38854438

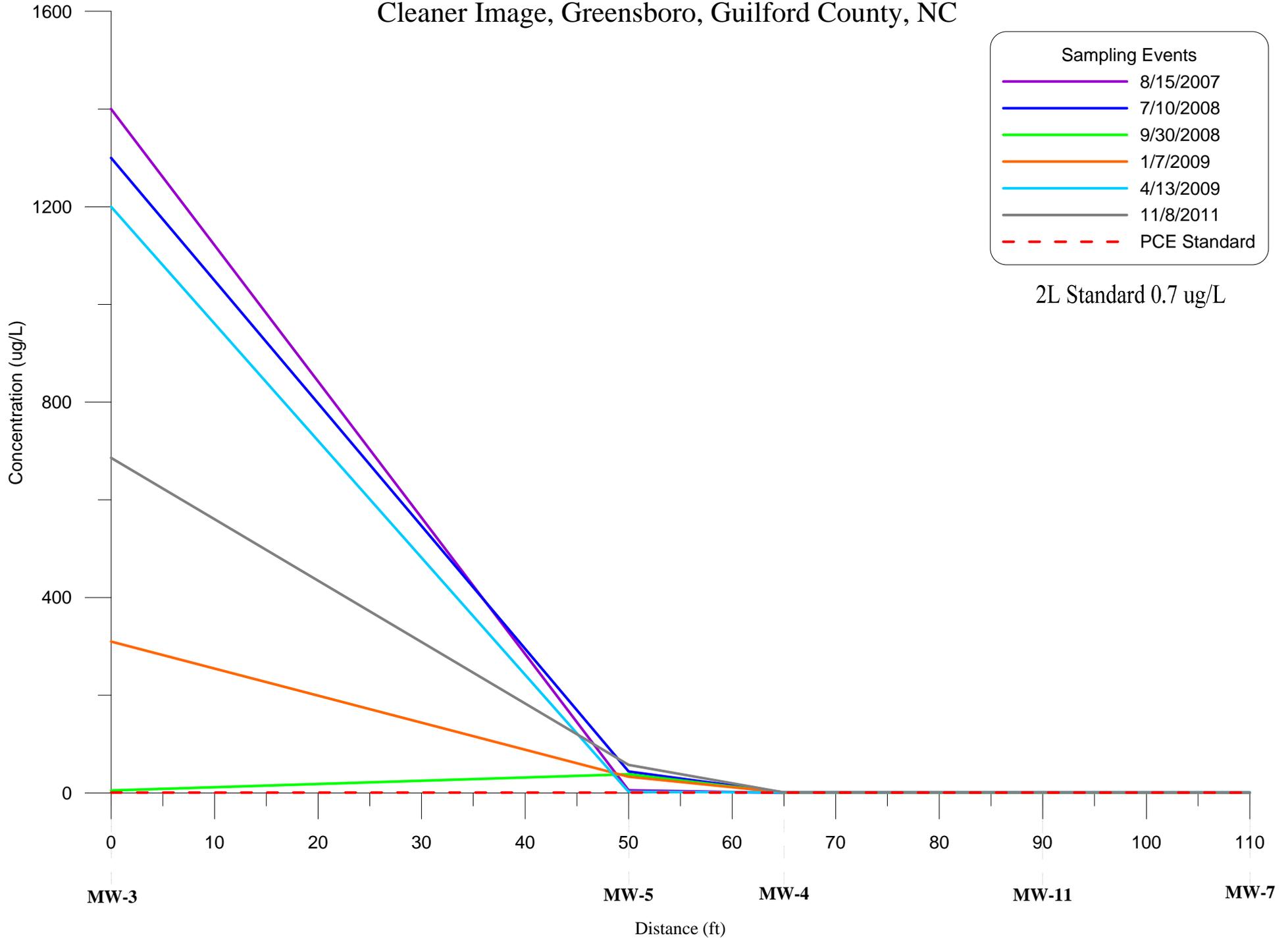


URS CORPORATION - NORTH CAROLINA
TWO SOUTH EXECUTIVE PARK
6135 PARK SOUTH DRIVE, SUITE 300
CHARLOTTE, NC 28210
TEL: (704) 522-0330
FAX: (704) 522-0063

Soil Impacts Exceeding the SSTL
Cleaner Image
4711 Lawndale Drive
Greensboro, NC
DSCA Site # 41-0001

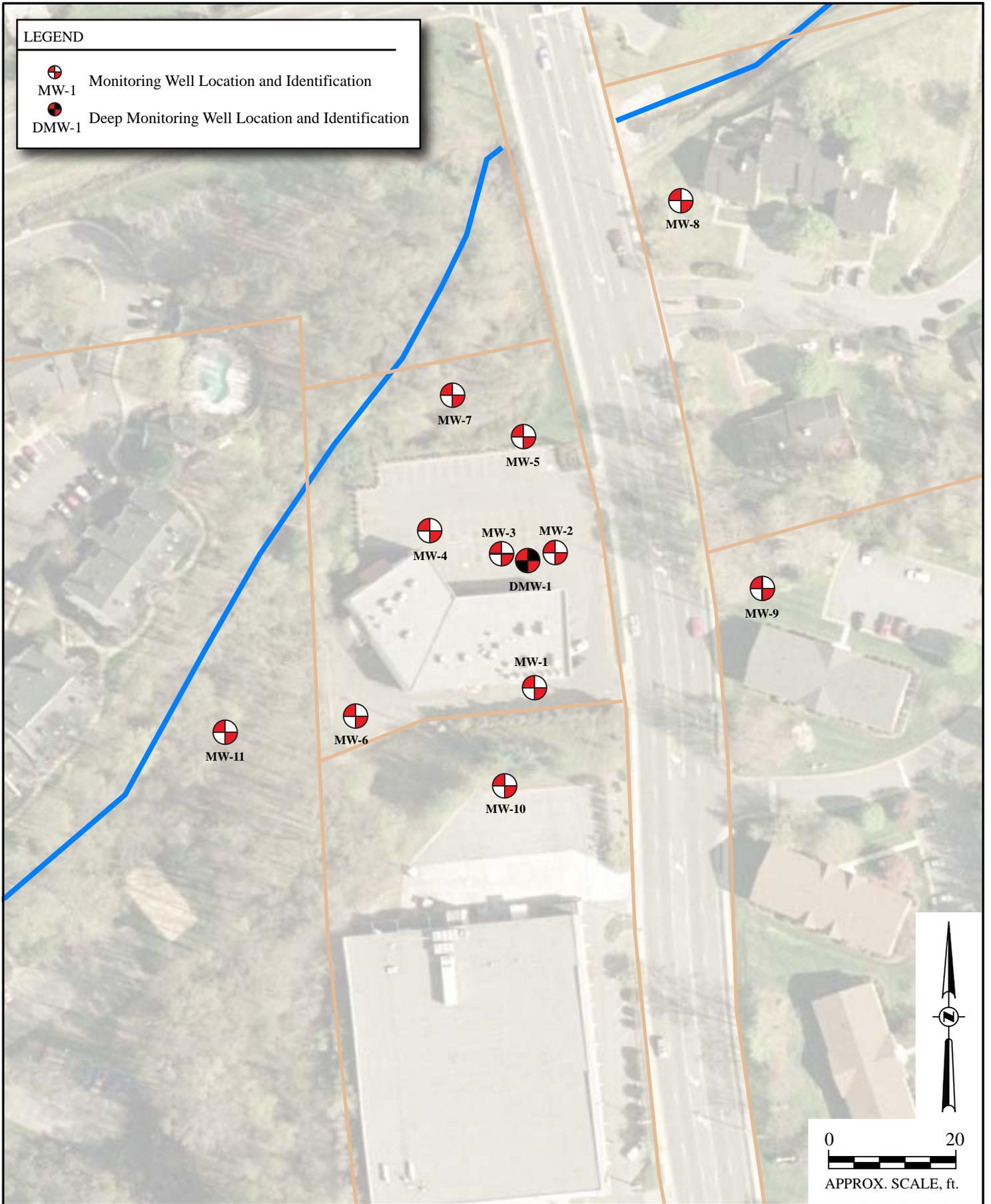
APPENDIX A
DOCUMENTATION OF PLUME STABILITY EVALUATION

Concentration vs. Distance
Sampling Events August 2007 through November 2011
Cleaner Image, Greensboro, Guilford County, NC



LEGEND

-  MW-1 Monitoring Well Location and Identification
-  DMW-1 Deep Monitoring Well Location and Identification



URS CORPORATION - NORTH CAROLINA
 TWO SOUTH EXECUTIVE PARK
 6135 PARK SOUTH DRIVE, SUITE 300
 CHARLOTTE, NC 28210
 TEL: (704) 522-0330
 FAX: (704) 522-0063



MW LOCATION MAP
 CLEANER IMAGE
 4711 LAWNSDALE DR
 GREENSBORO, NC
 DSCA SITE # 41-0001

DRAWN BY: SLP-9/05/08	CHECKED BY: RHM-9/05/08	PROJECT NO.:
		38854410

SHEET
ATT. 14

APPENDIX B
LEVEL I ECOLOGICAL RISK ASSESSMENT CHECKLISTS



January 20, 2009

North Carolina Department of Environment
and Natural Resources
Division of Waste Management – DSCA Program
401 Oberlin Road, Suite 150
Raleigh, NC 27605-1350

Att: Mr. Billy Meyer
DSCA Project Manager

Re: Level 1 Ecological Risk Assessment
Cleaner Image DSCA Site ID #41-0001
4711 Lawndale Dr
Greensboro, Guilford County, North Carolina
URS-NC Project Number 38854438

Dear Mr. Meyer:

URS Corporation – North Carolina (URS) is pleased to present the findings of the Level 1 Ecological Risk Assessment (Eco Risk Assessment) for the Cleaner Image facility (site) located in Greensboro, Guilford County, North Carolina to North Carolina Department of Environment and Natural Resources (NCDENR). The Eco Risk Assessment was completed in accordance with the DSCA program's Risk Based Corrective Action (RBCA) guidance document to assess the potential for ecological receptors. If you have any questions or require additional information, please do not hesitate to contact this office.

Sincerely,

URS CORPORATION-NORTH CAROLINA

Michael T. Chang
Environmental Scientist

Robert H. MacWilliams, PG
Program Manager

Attachment
cc: Project File (hard copy)

URS Corporation – North Carolina
6135 Park South Drive, Suite 300
Charlotte, North Carolina 28210
(704) 522-0330 Phone
(704) 522-0063 Fax

**Level 1 Ecological Risk Assessment
Checklist A for Potential Receptors and Habitat
DSCA # 41-0001**

1. **Are there any navigable water bodies or tributaries to a navigable water body on or within the one-half mile of this site?** Yes, according to the USGS topographic map, Lake Brandt, North Carolina, Richland Creek which leads to Richland Lake is located approximately 150 feet northwest of the site.
2. **Are there any water bodies anywhere on or within the one-half mile of the site?** Yes, Richland creek is located approximately 150 feet northwest of the site.
3. **Are there any wetland areas such as marshes or swamps on or within one-half mile of the site?** Yes, two wetland areas were identified by the National Wetland Inventory within ½ mile of the site. Additionally, Richland Creek would likely be classified as a wetland area.
4. **Are there any sensitive environmental areas on or within one-half mile of the site?** Yes, wetland areas, National Military Park NPS which was identified by the US Federal Lands database, and a threatened or endangered species or critical habitat for a vascular plant was identified on the North Carolina Natural Heritage Sites database within ½ mile of the site.
5. **Are there any areas on or within one-half mile of the site owned or used by local tribes?** No, none were identified by the Indian Reservation Database.
6. **Are there any habitat, foraging area or refuge by rare, threatened, endangered, candidate and/or proposed species (plants or animals), or any otherwise protected species on or within one-half mile of the site?** Yes, a threatened or endangered species or critical habitat for a vascular plant was identified between 0.25 and 0.5 mile east of the site on the North Carolina Natural Heritage Sites database.
7. **Are there any breeding, roosting or feeding areas by migratory bird species on or within one-half of the site?** Not likely. However, migratory birds are present in Guilford County according to the Guilford County website.
8. **Are there any ecologically, recreationally or commercially important species on or within one-half mile of the site?** None have been identified.
9. **Are there any threatened and/or endangered species (plant or animal) on or within one-half mile of the site?** Yes, a threatened or endangered species or critical habitat for a vascular plant was identified between 0.25 and 0.5 mile east of the site on the North Carolina Natural Heritage Sites database.

If the answer is “Yes” to any of the above questions, then complete Level 1 Ecological Risk Assessment, Checklist B for Potential Exposure Pathways.

Wetlands are defined in 40 CFR §232.2 as “areas inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances does support, a prevalence of vegetation typically adapted for life in saturated soil conditions.” The sources to make the determination whether or not wetland areas are present may include, but not limited to, national wetland inventory available at <http://nwi.fw.gov>, federal or state agency, and USGS topographic maps. Areas that provide unique and often protected habitat for wildlife species. These areas typically used during critical life stages such as breeding, rearing or young and overwintering. Refer to Attachment 1 for examples of sensitive environments. Ecologically important species include populations of species which provide a critical food resource for higher organisms. Ecologically important species include pest and opportunistic species that populate an area if they serve as a food source for other species, but do not include domesticated animals or plants/animals whose existence is maintained by continuous human interventions.

March 2007

DSCA Program

Level 1 Ecological Risk Assessment
Checklist B for Potential Receptors and Habitat
DSCA # 41-0001

- 1A. Can chemicals associated with the site leach, dissolve, or otherwise migrate to Groundwater? **Yes**
- 1B. Are chemicals associated with the site mobile in groundwater? **Yes**
- 1C. Does groundwater from the site discharge to ecological receptor habitat?
Yes, groundwater appears to discharge to Richland Creek located approximately 150 feet northwest of the site.
Question 1. Could chemicals associated with the site reach ecological receptors through groundwater? Potentially, impacted groundwater appears to be traveling to the northwest, toward Richland Creek.
- 2A. Are chemicals present in surface soils on the site? **Yes**
- 2B. Can chemicals be leached from or be transported by erosion of surface soils on the site?
No, surface soil impacts were only identified under impervious surfaces.
Question 2. Could chemicals associated with the site reach ecological receptors through runoff or erosion? Not likely, the surface soil impacts were only identified under the concrete building slab, therefore, erosion and runoff are not likely concerns.
- 3A. Are chemicals present in surface soil or on the surface of the ground? **Yes**
- 3B. Are potential ecological receptors on the site? **No**
Question 3. Could chemicals associated with the site reach ecological receptors through direct contact? No, soil impacts are located beneath impervious surfaces.
- 4A. Are chemicals on the site volatile? **Yes**
- 4B. Could chemicals on the site be transported in air as dust or particulate matter? **No, surficial soil impacts are located beneath impervious surfaces.**
Question 4. Could chemicals associated with the site reach ecological receptors through inhalation of volatilized chemicals or adhered chemicals to dust in ambient air or in subsurface burrows? Not likely, surficial soil contamination is located beneath impervious surfaces. No burrowing animals have been observed or would be expected beneath the building slab.
- 5A. Is Non-Aqueous Phase Liquid (NAPL) present at the site? **No**
- 5B. Is NAPL migrating? **No**
- 5C. Could NAPL discharge occur where ecological receptors are found? **No**
Question 5. Could chemicals associated with site reach ecological receptors Through migration of NAPL? No

- 6A. Are chemicals present in surface and shallow subsurface soils or on the surface of the ground? **Yes, chemicals have been identified 0' to 4.5' below ground surface beneath the building.**
- 6B. Are chemicals found in soil on the site taken up by plants growing on the site? **No, chemicals identified in soil were located beneath the building slab.**
- 6C. Do potential ecological receptors on or near the site feed on plants (e.g., grasses, Shrubs, forbs, trees, etc.) found on the site? **No.**
- 6D. Do chemicals found on the site bioaccumulate. **No.**
- Question 6. Could chemicals associated with the site reach ecological receptors through direct ingestion of soil, plants animals or contaminants? Not likely, as chemicals in soil have only been identified beneath the building slab.**

If the answer to one or more of the above six questions is “Yes”, the DENR may require further assessment to determine whether the site poses an unacceptable risk to ecological receptors.

March 2007

DSCA Program

APPENDIX C
NOTICE OF DRY CLEANING SOLVENT REMEDIATION
(NDCSR)

APPENDIX C-1
NDCSR FOR THE SOURCE PROPERTY
(K. H. PORTFOLIO I, LLC)

NOTICE OF DRY-CLEANING SOLVENT REMEDIATION

Property Owner: K H Portfolio I, LLC
Recorded in Book _____, Page _____
Associated plat recorded in Plat Book _____, Page _____

This documentary component of a Notice of Dry-Cleaning Solvent Remediation (hereinafter “Notice”) is hereby recorded on this ____ day of _____, 20____ by K H Portfolio I, LLC (hereinafter “Property Owner”). The survey plat component of the Notice is being recorded concurrently with this documentary component. The real property (hereinafter “Property”) which is the subject of this Notice is located at 4711 Lawndale Drive, Greensboro, Guilford County, North Carolina, Parcel Identification Number (PIN) 7857318043.

The Property is contaminated with dry-cleaning solvent, as defined at North Carolina General Statutes (hereinafter “N.C.G.S.”), Section (hereinafter “§”) 143-215.104B(b)(9) and other contaminants, and is one of 2 parcels that make up the dry-cleaning solvent contamination site (hereinafter “Contamination Site”). This Notice has been approved by the North Carolina Department of Environment and Natural Resources, or its successor in function (hereinafter “DENR”) under the authority of the Dry-Cleaning Solvent Cleanup Act of 1997, as amended, N.C.G.S. § 143-215.104A *et seq.* (hereinafter “DSCA”), and is required to be filed in the Register of Deeds' Office in the county or counties in which the land is located, pursuant to NCGS § 143-215.104M. A Notice will be recorded separately in each chain of title of the Contamination Site.

Soil and groundwater at the Property are contaminated with dry-cleaning solvents associated with dry-cleaning operations at the Cleaner Image (DSCA Site # 41-0001) located at 4711 Lawndale Drive, Greensboro in the Cotswold shopping center. Dry-cleaning operations were conducted on the Property from approximately 1987 to 2000.

Pursuant to N.C.G.S. § 143-215.104M, this Notice is being filed in order to reduce or eliminate the danger to public health or the environment posed by the Property. Attached hereto as **Exhibit A** is a reduction, to 8 1/2" x 11", of the survey plat component of the Notice required by N.C.G.S. § 143-215.104M. The survey plat has been prepared and certified by a professional

land surveyor and meets the requirements of G.S. 47-30, and contains the following information required by N.C.G.S. § 143-215.104M:

- (1) A description of the location and dimensions of the areas of potential environmental concern with respect to permanently surveyed benchmarks; and
- (2) The type, location and quantity of regulated dry-cleaning solvent contamination and other contaminants known to exist on the Property.

Attached hereto as **Exhibit B**, is a legal description of the Property that would be sufficient as a description in an instrument of conveyance.

Pursuant to NCGS § 143-215.104M, a certified copy of this Notice must be filed within 15 days of receipt of DENR's approval of the Notice or the effective date of the dry-cleaning solvent remediation agreement, whichever is later. Pursuant to NCGS § 143-215.104M, the copy of the Notice certified by DENR must be recorded in the grantor index under the names of the owners of the land.

LAND-USE RESTRICTIONS

NCGS § 143-215.104M requires that the Notice identify any restrictions on the current and future use of the Property that are necessary or useful to maintain the level of protection appropriate for the designated current or future use of the Property and that are designated in the dry-cleaning remediation agreement. The restrictions shall remain in force in perpetuity unless canceled by the Secretary of DENR, or his/her designee, after the hazards have been eliminated, pursuant to NCGS §143-215.104M. Those restrictions are hereby imposed on the Property, and are as follows:

- 1. The Property shall be used exclusively for retail, commercial or industrial purposes and related amenities (parking, landscape areas and walkways), and all other uses of the Property are prohibited except as approved in writing by DENR.**
- 2. Without prior written approval from DENR, the Property shall not be used for:**
 - a. child care centers or schools; or**
 - b. mining or extraction of coal, oil, gas or any mineral or non-mineral substances.**
- 3. No activities that encounter, expose, remove or use groundwater (for example, installation of water supply wells, fountains, ponds, lakes or swimming pools that use groundwater, or construction or excavation activities that encounter or expose groundwater) may occur on the Property without prior approval of DENR.**
- 4. No activities that cause or create a vapor intrusion risk (for example, construction of sub-grade structures that encounter contaminated soil or construction that places**

building users in close proximity to contaminated groundwater) may occur on the Property without prior approval of DENR.

- 5. No activities that cause or create an increase in infiltration (for example, removal or demolition of materials such as asphalt, concrete, buildings, or other structures that by their use and nature minimize infiltration of rain or water runoff into potentially contaminated soil) may occur in “Area A” of the Property, as shown on Exhibit A, without prior approval of DENR.**
- 6. In January of each year, on or before January 31st, the owner of any portion of the Property shall submit a notarized Annual DSCA Land-Use Restrictions Certification to DENR certifying that this Notice remains recorded at the Register of Deeds’ office, and that the Land-Use Restrictions are being complied with.**
- 7. No person conducting environmental assessment or remediation at the Property or involved in determining compliance with applicable land-use restrictions, at the direction of, or pursuant to a permit or order issued by DENR may be denied access to the Property for the purpose of conducting such activities.**
- 8. The owner of any portion of the Property shall cause the instrument of any sale, lease, grant, or other transfer of any interest in the property to include a provision expressly requiring the lessee, grantee, or transferee to comply with this Notice. The failure to include such a provision shall not affect the validity or applicability of any land-use restriction in this Notice.**

EASEMENT (RIGHT OF ENTRY)

The property owner grants and conveys to DENR, its agents, contractors, and employees, and any person performing pollution remediation activities under the direction of DENR, access at reasonable times and under reasonable security requirements to the Property to determine and monitor compliance with the land-use restrictions set forth in this Notice. Such investigations and actions are necessary by DENR to ensure that use, occupancy, and activities of and at the Property are consistent with the land-use restrictions and to ensure that the structural integrity and continued effectiveness of any engineering controls (if appropriate) described in the Notice are maintained. Whenever possible, at least 48 hours advance notice will be given to the Property Owner prior to entry. Advance notice may not always be possible due to conditions such as response time to complaints and emergency situations.

REPRESENTATIONS AND WARRANTIES

The Property Owner hereby represents and warrants to the other signatories hereto:

- i) that the Property Owner is the sole owner of the Property; **or** that the Property Owner has provided to DENR the names of all other persons that own an interest in or hold an encumbrance on the Property and have notified such persons of the Property Owner's intention to enter into this Notice;
- ii) that the Property Owner has the power and authority to enter into this Notice, to grant the rights and interests herein provided and to carry out all obligations hereunder; and
- iii) that this Notice will not materially violate or contravene or constitute a material default under any other agreement, document or instrument to which the Property Owner is a party or by which the Property Owner may be bound or affected.

ENFORCEMENT

The above land-use restrictions shall be enforceable without regard to lack of privity of estate or contract, lack of benefit to particular land, or lack of any property interest in particular land. The land-use restrictions shall be enforced by any owner of the Property. The land-use restrictions may also be enforced by DENR through the remedies provided in NCGS § 143-215.104P or by means of a civil action; by any unit of local government having jurisdiction over any part of the Property; and by any person eligible for liability protection under the DSCA who will lose liability protection if the restrictions are violated. Any attempt to cancel any or all of this Declaration without the approval of the Secretary of DENR (or its successor in function), or his/her delegate, shall be subject to enforcement by DENR to the full extent of the law. Failure by any party required-or authorized to enforce any of the above restrictions shall in no event be deemed a waiver of the right to do so thereafter as to the same violation or as to one occurring prior or subsequent thereto.

If a land-use restriction set out in this Notice required under NCGS § 143-215.104.M is violated, the owner of the Property at the time the land-use restriction is violated, the owner's successors and assigns, and the owner's agents who direct or contract for alteration of the contamination site in violation of a land-use restriction shall be liable for remediation of all contaminants to unrestricted use standards.

FUTURE SALES, LEASES, CONVEYANCES AND TRANSFERS

When any portion of the Property subject to this Notice is sold, leased, conveyed or transferred, the deed or other instrument of transfer shall contain in the description section, in no smaller type than that used in the body of the deed or instrument, (1) a statement that the property has been contaminated with dry-cleaning solvent and, if appropriate, cleaned up under the Act and (2) a reference by book and page to the recordation of this Notice.

The Property Owner shall notify DENR within fourteen (14) calendar days of the effective date of any conveyance, grant, gift, or other transfer, whole or in part, of the Property Owner's interest in the Property. This notification shall include the name, business address and phone number of the transferee and the expected date of transfer.

The Property Owner shall notify DENR within thirty (30) days following the petitioning or filing of any document by any person initiating a rezoning of the Property that would change the base zone of the Property.

PROPERTY OWNER SIGNATURE

IN WITNESS WHEREOF, Property Owner has caused this instrument to be duly executed this ___ day of _____, 20__.

K H Portfolio I, LLC

By:

Name of contact

STATE OF _____
COUNTY OF _____

I, _____, a Notary Public of the county and state aforesaid, certify that _____ personally came before me this day and acknowledged that he/she is a Member of K H Portfolio I, LLC, a North Carolina limited liability corporation, and its Manager, and that by authority duly given and as the act of the company, the foregoing Notice of Dry-Cleaning Solvent Remediation was signed in its name by him.

WITNESS my hand and official stamp or seal, this ___ day of _____, 20__.

Name typed or printed
Notary Public

My Commission expires: _____
[Stamp/Seal]

APPROVAL AND CERTIFICATION

The foregoing Notice of Dry-Cleaning Solvent Remediation is hereby approved and certified.

North Carolina Department of Environment and Natural Resources

By: _____
Jim Bateson, LG
Chief, Superfund Section
Division of Waste Management

Date

LIMITED POWER OF ATTORNEY

I _____ “Property Owner”, do hereby grant a limited power of attorney to DENR and to DENR’s independent contractors, as follows:

DENR and DENR’s independent contractors shall have the limited power of attorney to record this Notice, including its documentary and survey plat components, in accordance with N.C.G.S. § 143-215.104M on my “Property Owner” behalf. This limited power of attorney shall terminate upon completion of the recordation of the Notice.

Signature of Property Owner _____

Dated this _____ day of _____, 20____.

STATE OF _____
COUNTY OF _____

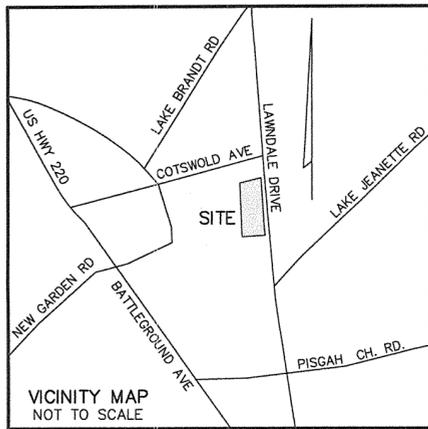
I, _____, a Notary Public, do hereby certify that _____ personally appeared before me this day and signed this “Limited Power of Attorney”.

WITNESS my hand and official stamp or seal, this ___ day of _____, 20____.

Name typed or printed
Notary Public

My Commission expires: _____
[Stamp/Seal]

EXHIBIT A
REDUCTION OF SURVEY PLAT



FLOOD CERTIFICATION:

THIS IS TO CERTIFY THAT A PORTION OF THE PROPERTY SHOWN ON THIS PLAT IS LOCATED IN A SPECIAL FLOOD HAZARD AREA AS SHOWN ON MAPS PREPARED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY, FEDERAL INSURANCE ADMINISTRATION, COMMUNITY NUMBERS 371078-5700-J & 371078-5600-J, DATED JUNE 18, 2007.

VRS SURVEY TIE:

ALL BEARINGS, DISTANCES AND COORDINATES SHOWN HEREON ARE LOCALIZED (GROUND) NAD 83 (2007 ADJUSTMENT) HORIZONTAL INFORMATION (UNLESS NOTED OTHERWISE), BASED UPON THE NORTH CAROLINA STATE PLANE COORDINATE SYSTEM, WITH NAVD88 ELEVATIONS. THE N.C. STATE PLANE COORDINATES FOR CONTROL POINTS #3-6, 43, & 44, SHOWN HEREON WERE ESTABLISHED UTILIZING GLOBAL POSITIONING SYSTEMS (GPS) IN CONJUNCTION WITH THE NORTH CAROLINA GEODETIC SURVEY'S VIRTUAL REFERENCE SYSTEM (VRS), WHICH IS BASED UPON THE CONTINUALLY OPERATING REFERENCE STATIONS (CORS). THE VRS SURVEY TIE WAS PERFORMED ON JULY 8, 2009, AND RE-CHECKED NOVEMBER 28, 2012. ALL MEASUREMENTS SHOWN HEREON ARE REPORTED IN U.S. SURVEY FEET UNLESS NOTED OTHERWISE.

SURVEY NOTES:

- 1) THE SUBJECT PROPERTY FOR THIS SURVEY IS IDENTIFIED BY GUILFORD COUNTY PARCEL IDENTIFICATION NUMBER (PIN #7857318043) THE PURPOSE OF THIS PLAT IS TO DISPLAY (1) THE LOCATIONS OF MONITORING WELLS LOCATED ON THE SUBJECT PROPERTY WITH RESPECT TO SURVEYED BENCHMARKS AND (2) THE TYPE, LOCATION AND QUANTITY OF REGULATED SUBSTANCES AND CONTAMINANTS KNOWN TO EXIST ON THIS NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES (NCDENR) DRY-CLEANING SOLVENT CLEANUP ACT (DSCA) PROGRAM SITE.
- 2) THE TYPES OF CONTAMINATION DEPICTED HEREON ARE APPROXIMATIONS DERIVED FROM THE BEST AVAILABLE INFORMATION AT THE TIME OF FILING. THIS INFORMATION WAS SUPPLIED TO THE ISAACS GROUP BY URS CORPORATION - NORTH CAROLINA.
- 3) ALL BEARINGS AND DISTANCES SHOWN HEREON ARE BASED UPON THE NORTH CAROLINA STATE PLANE COORDINATE SYSTEM, NAD 83 (NSRS 2007), WITH NAVD29 (GEOID 07) ELEVATIONS, PER A GPS SURVEY PERFORMED BY THE ISAACS GROUP, ON JULY 8TH, 2009. THE N.C. STATE PLANE COORDINATES SHOWN FOR CONTROL POINTS #3-6, #43, AND #44 WERE ESTABLISHED UTILIZING A TRIMBLE R8 GLOBAL POSITIONING SYSTEMS (GPS) UNIT IN CONJUNCTION WITH THE NORTH CAROLINA GEODETIC SURVEY'S VIRTUAL REFERENCE SYSTEM (VRS), WHICH IS BASED UPON THE CONTINUALLY OPERATING REFERENCE STATIONS (CORS). ALL MEASUREMENTS SHOWN HEREON ARE REPORTED IN U.S. SURVEY FEET (UNLESS NOTED OTHERWISE).
- 4) THIS PLAT DOES NOT REPRESENT A BOUNDARY SURVEY OF THE SUBJECT PROPERTY. THE BOUNDARY LINES OF THE SUBJECT PROPERTY WERE PRODUCED FROM THE LEGAL DESCRIPTION FOUND WITHIN THE SUBJECT PROPERTY'S DEED. THE GEOMETRY OF THAT LEGAL DESCRIPTION HAS NOT BEEN ALTERED IN ANY WAY, BUT HAS BEEN HELD ON THE SOUTHWEST CORNER (A FOUND IRON PIPE), OF DEED BOOK 6674, PAGES 271-275, PLAT BOOK 82, PAGE 82, AND ROTATED TO A FOUND IRON PIPE AT THE NORTHWEST CORNER OF THE PROPERTY AS SEEN IN DEED BOOK 6388, PAGES 828-833, PLAT BOOK 82, PAGE 82. NON-MONUMENTED SUBJECT PARCEL LINES ARE BASED ON THAT LEGAL DESCRIPTION. LOCATION OF NCDOT MONUMENTATION BASED ON THE DESCRIPTION FROM DEED BOOK 7322, PAGE 1467, WAS PERFORMED NOVEMBER 28, 2012. THE BOUNDARY OF THE ORIGINAL SUBJECT PROPERTY WAS REVISED AND IS REFLECTED ON THIS SURVEY.
- 5) SOME INFORMATION SUCH AS BUILDING FOOTPRINTS, MOST PROPERTY LINES, CURB LINES/EDGE OF PAVEMENTS AND FEMA FLOODWAY INFORMATION, HAVE BEEN TAKEN FROM GUILFORD COUNTY GIS DATABASE INFORMATION, AND THIS INFORMATION IS SHOWN FOR REFERENCE PURPOSES ONLY. NO ACCURACY OR POSITIONAL TOLERANCE IS GUARANTEED BY THIS SURVEY AS TO HOW THE SURVEYED FEATURES RELATE TO THE GIS INFORMATION SHOWN.
- 6) PROPERTY OWNER INFORMATION WAS OBTAINED ONLINE FROM GUILFORD COUNTY ONLINE RECORDS.
- 7) PROPERTIES SHOWN HEREON ARE SUBJECT TO ALL RIGHTS OF WAY, EASEMENTS COVENANTS AND RESTRICTIONS, APPURTENANCES OF RECORD, HOWEVER RECORDED AND/OR IMPLIED.
- 8) REFERENCE COORDINATE SYSTEM FOR VERTICAL DATUM: NAVD88.

- 9) THE FOLLOWING WAS USED TO PERFORM THE GPS SURVEY INFORMATION SHOWN:
 - (1) CLASS "A" SURVEY;
 - (2) POSITIONAL ACCURACY IS 0.070 FT WITHIN A 95 PERCENT CONFIDENCE LEVEL;
 - (3) REAL-TIME KINEMATIC GPS FIELD PROCEDURE;
 - (4) SURVEY PERFORMED JULY 8, 2009; AND CHECKED NOVEMBER 28, 2012
 - (5) VERTICAL DATUM BASED ON NAVD88;
 - (6) TIED TO N.C. STATE PLANE COORDINATES AS SHOWN;
 - (7) GEOID "07" MODEL;
 - (8) COMBINED GRID FACTOR: 1.0000398657;
 - (9) UNITS ARE IN U.S. FEET.

APPROVED FOR THE PURPOSES OF N.C.G.S. 143-215.104M

JIM BATESON, LG
CHIEF SUPERFUND SECTION
DIVISION OF WASTE MANAGEMENT

STATE OF NORTH CAROLINA
COUNTY OF WAKE

I, _____, A NOTARY PUBLIC OF _____ COUNTY AND STATE OF NORTH CAROLINA DO HEREBY CERTIFY THAT _____ DID PERSONALLY APPEAR & SIGN BEFORE ME THIS THE _____ DAY OF _____, 20____.

NOTARY PUBLIC (SIGNATURE)

MY COMMISSION EXPIRES _____

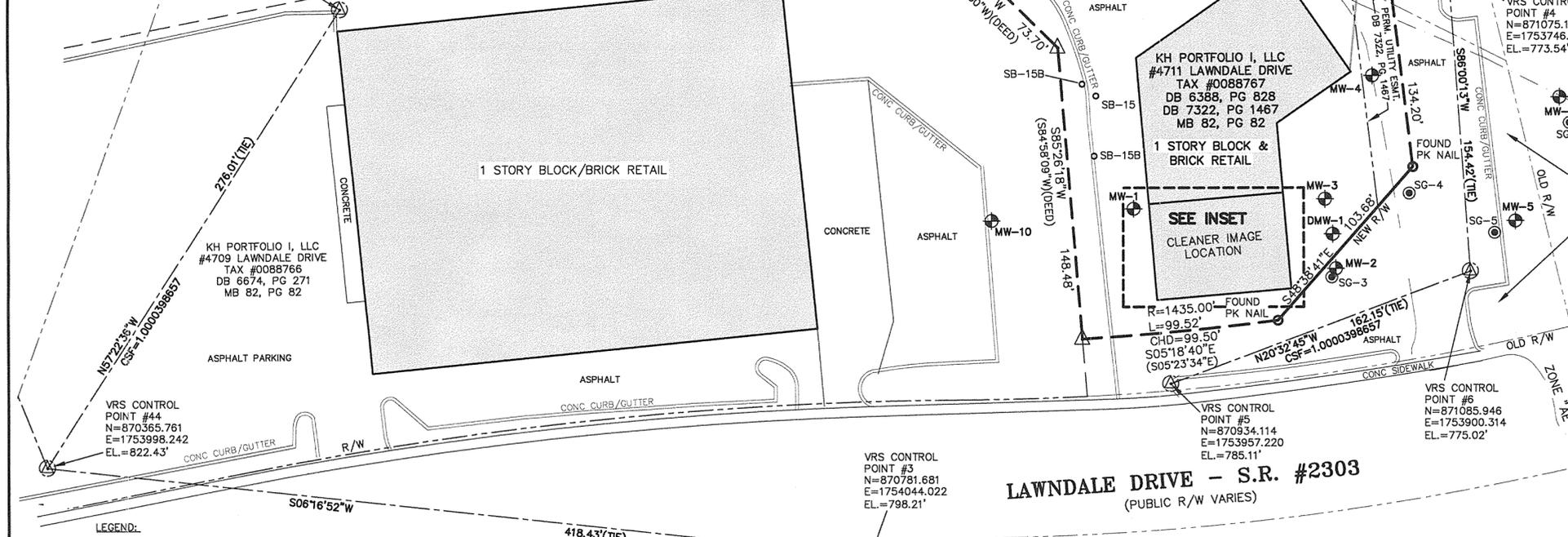
SURVEYORS CERTIFICATE [G.S. 47-30]

I, STEPHEN S. DYER, CERTIFY THAT THIS MAP WAS DRAWN UNDER MY SUPERVISION FROM AN ACTUAL SURVEY MADE UNDER MY SUPERVISION; THAT THE BOUNDARIES NOT SURVEYED ARE CLEARLY INDICATED AS DASHED LINES, DRAWN FROM INFORMATION REFERENCED ON THE FACE OF THIS PLAT; THAT THE RATIO OF PRECISION AS CALCULATED EXCEEDS 1:10,000; THAT THIS SURVEY IS OF AN EXISTING PARCEL OR PARCELS OF LAND AND DOES NOT CREATE A NEW STREET OR CHANGE AN EXISTING STREET; THAT THIS PLAT WAS PREPARED IN ACCORDANCE WITH G.S. 47-30(f)(11) AS AMENDED; WITHIN MY ORIGINAL SIGNATURE REGISTRATION NUMBER AND SEAL THIS _____TH DAY OF _____, 2013.

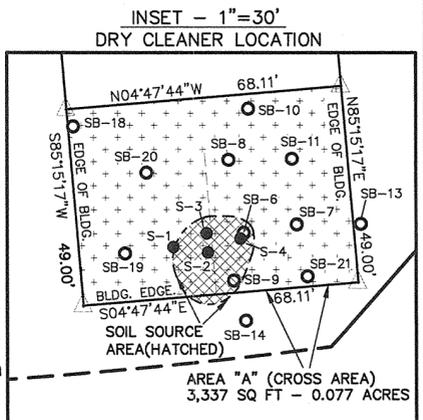
FOR REVIEW PURPOSES ONLY

STEPHEN S. DYER, PLS L-3509
N.C. FIRM LICENSE #C-1069

VRS CONTROL POINT #43
N=870514.561
E=1753765.776
EL.=809.85'



DATE: 7-08-09, REV 1-7-13		PROJECT NAME: CLEANER IMAGE		
LOCATION: GREENSBORO, NC		DSCA SITE ID #41-0001		
MONITORING WELL ID	NORTHING (FEET)	EASTING (FEET)	ELEVATION (FEET)	DESIGNATION
MW 1	870915.60	1753868.08	780.48	T.O.W.
TCMW 1	870915.60	1753868.08	780.07	2" PVC
DMW 1	871016.29	1753881.10	779.68	T.O.W.
TCDMW 1	871016.29	1753881.10	779.34	2" PVC
MW 2	871017.90	1753898.71	779.65	T.O.W.
TCMW 2	871017.90	1753898.71	779.28	2" PVC
MW 3	871012.46	1753863.31	779.88	T.O.W.
TCMW 3	871012.46	1753863.31	779.68	2" PVC
MW 4	871036.56	1753800.66	777.43	T.O.W.
TCMW 4	871036.56	1753800.66	777.13	2" PVC
MW 5	871108.75	1753874.59	774.57	T.O.W.
TCMW 5	871108.75	1753874.59	774.33	2" PVC
MW 6	870899.4446	1753753.089	777.17	T.O.W.
TCMW 6	870899.4446	1753753.089	776.74	2" PVC
MW 7	871131.20	1753811.79	767.07	GROUND
MW 7	871131.20	1753811.79	769.20	T.O.W.
TCMW 7	871131.20	1753811.79	769.11	2" PVC
MW 8	871293.64	1754004.83	771.75	T.O.W.
TCMW 8	871293.64	1754004.83	771.05	2" PVC
MW 9	870979.51	1754064.84	786.73	T.O.W.
TCMW 9	870979.51	1754064.84	785.82	2" PVC
MW 10	870843.59	1753874.04	802.29	T.O.W.
TCMW 10	870843.59	1753874.04	801.67	2" PVC
MW 11	870943.81	1753687.22	768.68	GROUND
MW 11	870943.81	1753687.22	770.25	T.O.W.
TCMW 11	870943.81	1753687.22	770.25	2" PVC
SG-3	871015.78	1753903.12	779.85	
SG-4	871055.11	1753860.53	776.82	
SG-5	871098.25	1753880.63	774.55	
SG-6	871136.17	1753824.94	770.73	



- LEGEND:**
- R/W RIGHT OF WAY
 - N.T.S. NOT TO SCALE
 - CSF COMBINED SCALE FACTOR
 - E/P EDGE OF PAVEMENT
 - MONITORING WELL (MW)
 - N NORTHING
 - E EASTING
 - TOC TOP OF CASING
 - TOW TOP OF WELL MANHOLE
 - ▲ CALCULATED PROPERTY CORNER
 - ▲ DATUM CONTROL POINT
 - N/O NOW OR FORMERLY
 - SUBJECT LINES WITH FOUND MON.
 - SUBJECT LINES PLOTTED FROM DEEDS
 - ADJOINER PARCEL LINES
 - RIGHT OF WAY LINE
 - CONTROL TIE LINES
 - FEMA FLOOD LINES
 - "SB-#" SOIL SAMPLE LOCATION-JULY 2008
 - "S-#" SOIL SAMPLE LOCATION-APRIL 2009

OWNERS CERTIFICATE:

I ACKNOWLEDGE THAT I HAVE FULL AUTHORITY TO LEGALLY EXECUTE A DEED FOR THIS PROPERTY.

SIGNATURE _____ DATE _____

STATE OF NORTH CAROLINA
COUNTY OF _____

I, _____, A NOTARY PUBLIC OF SAID COUNTY AND STATE, DO HEREBY CERTIFY THAT _____ DID PERSONALLY APPEAR AND SIGN BEFORE ME THIS THE _____ DAY OF _____.

NOTARY PUBLIC (SIGNATURE) _____
MY COMMISSION EXPIRES _____

- LEGEND:**
- ▨ SOIL SOURCE AREA
 - ▨+▨ AREA OF SOIL IMPACTS ABOVE SSTL

"N.C.G.S. 143-215.104M(d) REQUIRES THAT WHEN PROPERTY FOR WHICH A NOTICE OF DRY-CLEANING SOLVENT REMEDIATION HAS BEEN FILED IS SOLD, LEASED, CONVEYED OR TRANSFERRED, THE DEED OR OTHER INSTRUMENT OF TRANSFER SHALL CONTAIN IN THE DESCRIPTION SECTION, IN NO SMALLER TYPE THAN THAT USED IN THE BODY OF THE DEED OR INSTRUMENT, A STATEMENT THAT THE PROPERTY HAS BEEN CONTAMINATED WITH DRY-CLEANING SOLVENT AND, IF APPROPRIATE, CLEANED UP UNDER THIS PART. USE THE FOLLOWING STATEMENT TO SATISFY N.C.G.S. 143-215.104M(d):

THIS PROPERTY HAS BEEN CONTAMINATED WITH DRY-CLEANING SOLVENT. A NOTICE OF DRY-CLEANING SOLVENT REMEDIATION IS RECORDED IN THE GUILFORD COUNTY REGISTER OF DEED'S OFFICE AT: BOOK _____ PAGE _____

QUESTIONS CONCERNING THIS MATTER MAY BE DIRECTED TO THE NORTH CAROLINA DIVISION OF WASTE MANAGEMENT, SUPERFUND SECTION, DRY-CLEANING SOLVENT CLEANUP ACT (DSCA) PROGRAM, OR ITS SUCCESSOR IN FUNCTION. 1646 MAIL SERVICE CENTER, RALEIGH, NC 27699-1646.

THE DOCUMENTARY COMPONENT OF THIS NOTICE OF DRY-CLEANING SOLVENT REMEDIATION WHICH IDENTIFIES, CONTROLS OR LIMITATIONS ON THE USE OF THIS PROPERTY IS RECORDED AT:

DEED BOOK _____ PAGE _____
AND _____

NO.	BY	DATE	REVISION
1	MMW	11-13-13	ADDED IN AREA "A"
2	MMW	11-22-13	ADDED GPS INFO ITEM #9-(2)

SURVEY PLAT - EXHIBIT "A"
TO THE NOTICE OF DRY-CLEANING SOLVENT REMEDIATION
KH PORTFOLIO I, LLC
PIN #7857318043

CLEANER IMAGE-DSCA #41-0001
#4711 LAWDALE DRIVE, GREENSBORO, 27455-2031
MOREHEAD TOWNSHIP, GUILFORD COUNTY, NORTH CAROLINA

File #: 09125-DSCA2-REV Date: 08-29-2013 Project P.L.S.: SSD

THE ISAACS GROUP
CIVIL ENGINEERING DESIGN AND LAND SURVEYING

8720 RED OAK BLVD. SUITE 420
CHARLOTTE, N.C. 28217
PHONE (704) 527-3440 FAX (704) 527-8335

SHEET 1 OF 2

EXHIBIT B
PROPERTY LEGAL DESCRIPTION

Exhibit "B"
Former Cleaner Image Cleaners
#4711 Lawndale Drive
Parcel #0088767

Beginning at a point on the new westerly margin of Lawndale Drive-S.R. #2303 (Public R/W Varies), a common corner with lands of KH Portfolio I, LLC (Deed Bk 6674, Page 271); Thence with the shared line of KH Portfolio I the following two (2) courses and distances:

1) S. 85-26-18 W. 148.48 feet to a point;

2) S. 44-38-59 W. 73.70 feet to a point on the eastern property line of Hedges Apartments, LLC (Deed Book 4496, Page 1732); Thence with the shared line of Hedges Apartments the following two (2) courses and distances:

1) N. 03-59-51 W. 180.44 feet to a found #5 rebar;

2) N. 12-36-51 W. 36.81 feet to a point on the new right-of-way margin of Lawndale Drive (Public R/W Varies, Deed Book 7322, Page 1467); Thence with the new R/W Margin the following three (3) courses and distances;

1) N. 83-12-28 E. 134.20 feet to a found PK Nail;

2) S. 48-38-41 E. 103.68 feet to a found PK Nail;

3) With a curve to the right having a radius of 1,435.00 feet, an arc length of 99.52 feet (subtended by a chord S. 05-23-34 E. 99.50 feet) to a point, and returning to the POINT AND PLACE OF BEGINNING, containing 33,613 square feet (0.772 Acres), more or less.

APPENDIX C-2
NDCSR FOR THE OFFSOURCE PROPERTY
(NCDOT)

NOTICE OF DRY-CLEANING SOLVENT REMEDIATION

Property Owner: North Carolina Department of Transportation
Recorded in Book _____, Page _____
Associated plat recorded in Plat Book _____, Page _____

This documentary component of a Notice of Dry-Cleaning Solvent Remediation (hereinafter "Notice") is hereby recorded on this ____ day of _____, 20____. The survey plat component of the Notice is being recorded concurrently with this documentary component. The real property (hereinafter "Property") which is the subject of this Notice is located at 4711 Lawndale Drive, Greensboro, Guilford County, North Carolina, Parcel Identification Number (PIN) 7857308587.

The Property is contaminated with dry-cleaning solvent, as defined at North Carolina General Statutes (hereinafter "N.C.G.S."), Section (hereinafter "§") 143-215.104B(b)(9), and other contaminants and is one of eight parcels that make up the dry-cleaning solvent contamination site (hereinafter "Contamination Site"). This Notice has been approved by the North Carolina Department of Environment and Natural Resources, or its successor in function (hereinafter "DENR") under the authority of the Dry-Cleaning Solvent Cleanup Act of 1997, as amended, N.C.G.S. § 143-215.104A *et seq.* (hereinafter "DSCA"), and is required to be filed in the Register of Deeds' Office in the county or counties in which the land is located, pursuant to NCGS § 143-215.104I. A Notice will be recorded separately in each chain of title of the Contamination Site.

Groundwater under the Property is contaminated with dry-cleaning solvents associated with dry-cleaning operations at the Cleaner Image (DSCA Site 41-0001) located at 4711 Lawndale Drive in Greensboro, North Carolina. **A risk assessment of the contaminated Property concluded that the contamination poses no unacceptable risk as long as groundwater on the Property is not used as a source of water for any water supply wells.**

Pursuant to N.C.G.S. § 143-215.104I, this Notice is being filed in order to reduce or eliminate the danger to public health or the environment posed by the Property. Attached hereto as **Exhibit A** is a reduction, to 8 1/2" x 11", of the survey plat component of the Notice required by N.C.G.S. § 143-215.104M. The survey plat has been prepared and certified by a professional

land surveyor and meets the requirements of G.S. 47-30, and contains the following information required by N.C.G.S. § 143-215.104M:

- (1) A description of the location and dimensions of the areas of potential environmental concern with respect to permanently surveyed benchmarks; and
- (2) The type, location and quantity of regulated dry-cleaning solvent contamination and other contaminants known to exist on the Property.

Attached hereto as **Exhibit B** is a legal description of the Property that would be sufficient as a description in an instrument of conveyance.

USE OF GROUNDWATER PROHIBITED BY STATE AND LOCAL REGULATIONS

Groundwater on this property contains contaminants that exceed unrestricted use standards. Pursuant to 15A North Carolina Administrative Code 02C .0107(b)(1), “(t)he source of water for any water supply well shall not be from a water bearing zone or aquifer that is contaminated.” Therefore, state law prohibits construction of a water supply well on this property unless it can be demonstrated that the water pumped from the well is not contaminated. Further, pursuant to North Carolina General Statute 87-88(c) and 15A North Carolina Administrative Code 02C .0112(a), no well may be constructed or maintained in a manner whereby it could be a source or channel of contamination of the groundwater supply or any aquifer.

Pursuant to the Guilford County Well Rules, Chapter 1, Section I, no person shall construct, repair or abandon, or cause to be constructed, repaired or abandoned any well contrary to the provisions of the regulations and standards set forth by Guildford County Health Department. Pursuant to Chapter 2, Section III, special consideration shall be given for wells located within a one-thousand-five-hundred foot radius around a point or source of established groundwater contamination. The minimum horizontal separation between a well and potential sources of groundwater contamination which exist or have been permitted at the time the well is constructed, shall be in accordance with Section III, Subparagraph (A)3.

FUTURE SALES, LEASES, CONVEYANCES AND TRANSFERS

When any portion of the Property is sold, leased, conveyed or transferred, pursuant to NCGS § 143-215.104M the deed or other instrument of transfer shall contain in the description section, in no smaller type than that used in the body of the deed or instrument, a statement that the Property has been contaminated with dry-cleaning solvent and, if appropriate, cleaned up under the DSCA.

CANCELLATION OF THE NOTICE

The Notice may, at the request of the Property Owner, be canceled by DENR after the risk to public health and the environment associated with the dry-cleaning solvent contamination and any other contaminants included in the DSCA Remediation Agreement have been eliminated as a result of remediation of the Property to unrestricted use standards.

APPROVAL AND CERTIFICATION OF NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

The foregoing Notice of Dry-Cleaning Solvent Remediation is hereby approved and certified.

North Carolina Department of Environment and Natural Resources

By: _____ Date _____
Jim Bateson, LG
Chief, Superfund Section
Division of Waste Management

STATE OF NORTH CAROLINA
COUNTY OF WAKE

I, _____, a Notary Public of Wake County and State of North Carolina do hereby certify that _____ did personally appeared before me this the ___ day of _____, 20___.

Name typed or printed
Notary Public

My Commission expires: _____
[Stamp/Seal]

CERTIFICATION OF REGISTER OF DEEDS

The foregoing documentary component of the Notice of Dry-Cleaning Solvent Remediation, and the associated plat, are certified to be duly recorded at the date and time, and in the Books and Pages, shown on the first page hereof.

Register of Deeds for Guilford County

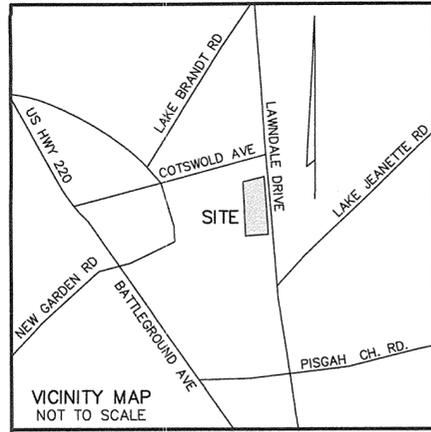
By: _____

Name typed or printed: _____

Deputy/Assistant Register of Deeds

Date

EXHIBIT A
NORTH CAROLINA DEPARTMENT OF TRANSPORTATION
SURVEY PLAT REDUCTION



FLOOD CERTIFICATION:

THIS IS TO CERTIFY THAT A PORTION OF THE PROPERTY SHOWN ON THIS PLAT IS LOCATED IN A SPECIAL FLOOD HAZARD AREA AS SHOWN ON MAPS PREPARED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY, FEDERAL INSURANCE ADMINISTRATION, COMMUNITY NUMBERS 371078-5700-J & 371078-5600-J, DATED JUNE 18, 2007.

VRS SURVEY TIE:

ALL BEARINGS, DISTANCES AND COORDINATES SHOWN HEREON ARE LOCALIZED (GROUND) NAD 83 (2007 ADJUSTMENT) HORIZONTAL INFORMATION (UNLESS NOTED OTHERWISE), BASED UPON THE NORTH CAROLINA STATE PLANE COORDINATE SYSTEM, WITH NAVD88 ELEVATIONS. THE N.C. STATE PLANE COORDINATES FOR CONTROL POINTS #3-6, 43, & 44, SHOWN HEREON WERE ESTABLISHED UTILIZING GLOBAL POSITIONING SYSTEMS (GPS) IN CONJUNCTION WITH THE NORTH CAROLINA GEODETIC SURVEY'S VIRTUAL REFERENCE SYSTEM (VRS), WHICH IS BASED UPON THE CONTINUALLY OPERATING REFERENCE STATIONS (CORS). THE VRS SURVEY TIE WAS PERFORMED ON JULY 8, 2009, AND RE-CHECKED NOVEMBER 28, 2012. ALL MEASUREMENTS SHOWN HEREON ARE REPORTED IN U.S. SURVEY FEET UNLESS NOTED OTHERWISE.

SURVEY NOTES:

- THE SUBJECT PROPERTY FOR THIS SURVEY IS IDENTIFIED AS CONVEYED RIGHT-OF-WAY AREA PER DEED 7322, PAGE 1467. THE PURPOSE OF THIS PLAT IS TO DISPLAY (1) THE LOCATIONS OF MONITORING WELLS LOCATED ON THE SUBJECT PROPERTY WITH RESPECT TO SURVEYED BENCHMARKS AND (2) THE TYPE, LOCATION AND QUANTITY OF REGULATED SUBSTANCES AND CONTAMINANTS KNOWN TO EXIST ON THIS NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES (NCDENR) DRY-CLEANING SOLVENT CLEANUP ACT (DSCA) PROGRAM SITE.
- THE TYPES OF CONTAMINATION DEPICTED HEREON ARE APPROXIMATIONS DERIVED FROM THE BEST AVAILABLE INFORMATION AT THE TIME OF FILING. THIS INFORMATION WAS SUPPLIED TO THE ISAACS GROUP BY URS CORPORATION - NORTH CAROLINA.
- ALL BEARINGS, DISTANCES AND COORDINATES SHOWN HEREON ARE BASED UPON THE NORTH CAROLINA STATE PLANE COORDINATE SYSTEM, NAD 83 (NRS 2007), WITH NAVD88 (GEOID 07) ELEVATIONS. PER A GPS SURVEY PERFORMED BY THE ISAACS GROUP, ON JULY 8TH, 2009, THE N.C. STATE PLANE COORDINATES SHOWN FOR CONTROL POINTS #3-6, #43, AND #44 WERE ESTABLISHED UTILIZING A TRIMBLE R8 GLOBAL POSITIONING SYSTEMS (GPS) UNIT IN CONJUNCTION WITH THE NORTH CAROLINA GEODETIC SURVEY'S VIRTUAL REFERENCE SYSTEM (VRS), WHICH IS BASED UPON THE CONTINUALLY OPERATING REFERENCE STATIONS (CORS). ALL MEASUREMENTS SHOWN HEREON ARE REPORTED IN U.S. SURVEY FEET (UNLESS NOTED OTHERWISE).
- THIS PLAT DOES NOT REPRESENT A BOUNDARY SURVEY OF THE SUBJECT PROPERTY. THE BOUNDARY LINES OF THE SUBJECT PROPERTY WERE PRODUCED FROM THE LEGAL DESCRIPTION FOUND WITHIN THE SUBJECT PROPERTY'S DEED. THE GEOMETRY OF THAT LEGAL DESCRIPTION HAS NOT BEEN ALTERED IN ANY WAY, BUT HAS BEEN HELD ON THE SOUTHWEST CORNER (A FOUND IRON PIPE), OF DEED BOOK 6674, PAGES 271-275, PLAT BOOK 82, PAGE 82, AND ROTATED TO A FOUND IRON PIPE AT THE NORTHWEST CORNER OF THE PROPERTY AS SEEN IN DEED BOOK 6388, PAGES 828-833, PLAT BOOK 82, PAGE 82. NON-MONUMENTED SUBJECT PARCEL LINES ARE BASED ON THAT LEGAL DESCRIPTION. LOCATION OF NCDOT MONUMENTATION BASED ON THE DESCRIPTION FROM DEED BOOK 7322, PAGE 1467, WAS PERFORMED NOVEMBER 28, 2012.
- SOME INFORMATION SUCH AS BUILDING FOOTPRINTS, MOST PROPERTY LINES, CURB LINES/EDGE OF PAVEMENTS AND FEMA FLOODWAY INFORMATION, HAVE BEEN TAKEN FROM GUILFORD COUNTY GIS DATABASE INFORMATION, AND THIS INFORMATION IS SHOWN FOR REFERENCE PURPOSES ONLY. NO ACCURACY OR POSITIONAL TOLERANCE IS GUARANTEED BY THIS SURVEY AS TO HOW THE SURVEYED FEATURES RELATE TO THE GIS INFORMATION SHOWN.
- PROPERTY OWNER INFORMATION WAS OBTAINED ONLINE FROM GUILFORD COUNTY ONLINE RECORDS.
- PROPERTIES SHOWN HEREON ARE SUBJECT TO ALL RIGHTS OF WAY, EASEMENTS COVENANTS AND RESTRICTIONS, APPURTENANCES OF RECORD, HOWEVER RECORDED AND/OR IMPLIED.
- REFERENCE COORDINATE SYSTEM FOR VERTICAL DATUM: NAVD88.

- 9) THE FOLLOWING WAS USED TO PERFORM THE GPS SURVEY INFORMATION SHOWN:
- CLASS "A" SURVEY;
 - POSITIONAL ACCURACY IS 0.070 FT WITHIN A 95 PERCENT CONFIDENCE LEVEL;
 - REAL-TIME KINEMATIC GPS FIELD PROCEDURE;
 - SURVEY PERFORMED JULY 8, 2009; AND CHECKED NOVEMBER 28, 2012
 - VERTICAL DATUM BASED ON NAVD88;
 - TIED TO N.C. STATE PLANE COORDINATES AS SHOWN;
 - GEOID "07" MODEL;
 - COMBINED GRID FACTOR: 1.0000398657;
 - UNITS ARE IN U.S. FEET.

APPROVED FOR THE PURPOSES OF N.C.G.S. 143-215.104M

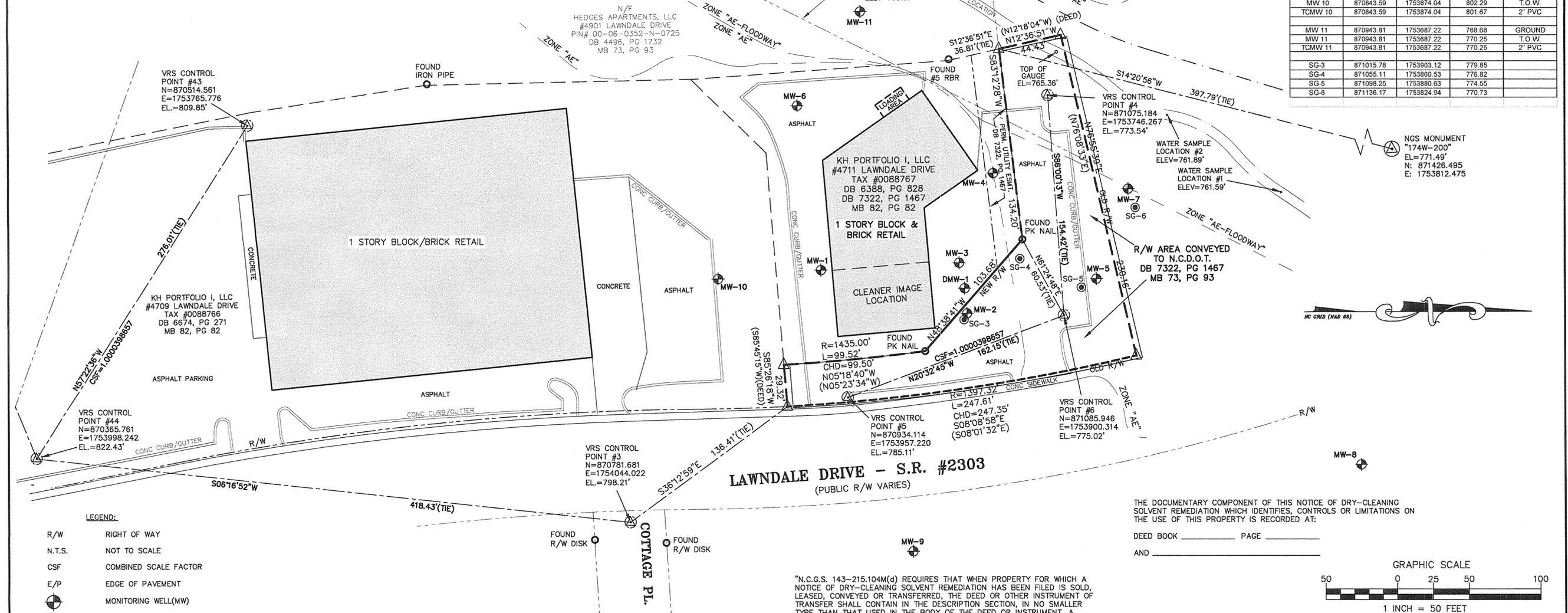
JIM BATESON, LG
CHIEF SUPERFUND SECTION
DIVISION OF WASTE MANAGEMENT
STATE OF NORTH CAROLINA
COUNTY OF WAKE

I, _____, A NOTARY PUBLIC OF _____ COUNTY AND STATE OF NORTH CAROLINA DO HEREBY CERTIFY THAT SIGN BEFORE ME THIS THE _____ DAY OF _____, 20____, DID PERSONALLY APPEAR &

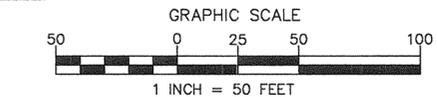
NOTARY PUBLIC (SIGNATURE)

MY COMMISSION EXPIRES _____

DATE: 7-08-09, REV 1-7-13		PROJECT NAME: CLEANER IMAGE		
LOCATION: GREENSBORO, NC		DSCA SITE ID #41-0001		
MONITORING WELL ID	NORTHING (FEET)	EASTING (FEET)	ELEVATION (FEET)	DESIGNATION
MW 1	870915.60	1753868.08	780.48	T.O.W.
TCMW 1	870915.60	1753868.08	780.07	2" PVC
DMW 1	871016.29	1753881.10	779.68	T.O.W.
TCDMW 1	871016.29	1753881.10	779.34	2" PVC
MW 2	871017.90	1753898.71	779.65	T.O.W.
TCMW 2	871017.90	1753898.71	779.28	2" PVC
MW 3	871012.46	1753893.31	779.88	T.O.W.
TCMW 3	871012.46	1753893.31	779.68	2" PVC
MW 4	871036.56	1753800.66	777.43	T.O.W.
TCMW 4	871036.56	1753800.66	777.13	2" PVC
MW 5	871108.75	1753874.59	774.57	T.O.W.
TCMW 5	871108.75	1753874.59	774.33	2" PVC
MW 6	870899.4446	1753753.089	777.17	T.O.W.
TCMW 6	870899.4446	1753753.089	776.74	2" PVC
MW 7	871131.20	1753811.79	767.07	GROUND
MW 7	871131.20	1753811.79	769.20	T.O.W.
TCMW 7	871131.20	1753811.79	769.11	2" PVC
MW 8	871293.64	1754004.83	771.75	T.O.W.
TCMW 8	871293.64	1754004.83	771.05	2" PVC
MW 9	870979.51	1754084.84	786.73	T.O.W.
TCMW 9	870979.51	1754084.84	785.82	2" PVC
MW 10	870843.59	1753874.04	802.29	T.O.W.
TCMW 10	870843.59	1753874.04	801.67	2" PVC
MW 11	870943.81	1753687.22	768.68	GROUND
MW 11	870943.81	1753687.22	770.25	T.O.W.
TCMW 11	870943.81	1753687.22	770.25	2" PVC
SG-3	871015.78	1753903.12	779.85	
SG-4	871055.11	1753860.53	776.82	
SG-5	871098.25	1753890.63	774.55	
SG-6	871136.17	1753824.94	770.73	



NGS MONUMENT "174W-200"
EL.=771.49'
N: 871426.495
E: 1753812.475



THE DOCUMENTARY COMPONENT OF THIS NOTICE OF DRY-CLEANING SOLVENT REMEDIATION WHICH IDENTIFIES, CONTROLS OR LIMITATIONS ON THE USE OF THIS PROPERTY IS RECORDED AT:

DEED BOOK _____ PAGE _____
AND _____

"N.C.G.S. 143-215.104M(d) REQUIRES THAT WHEN PROPERTY FOR WHICH A NOTICE OF DRY-CLEANING SOLVENT REMEDIATION HAS BEEN FILED IS SOLD, LEASED, CONVEYED OR TRANSFERRED, THE DEED OR OTHER INSTRUMENT OF TRANSFER SHALL CONTAIN IN THE DESCRIPTION SECTION, IN NO SMALLER TYPE THAN THAT USED IN THE BODY OF THE DEED OR INSTRUMENT, A STATEMENT THAT THE PROPERTY HAS BEEN CONTAMINATED WITH DRY-CLEANING SOLVENT AND, IF APPROPRIATE, CLEANED UP UNDER THIS PART. USE THE FOLLOWING STATEMENT TO SATISFY N.C.G.S. 143-215.104M(d):

THIS PROPERTY HAS BEEN CONTAMINATED WITH DRY-CLEANING SOLVENT. A NOTICE OF DRY-CLEANING SOLVENT REMEDIATION IS RECORDED IN THE GUILFORD COUNTY REGISTER OF DEEDS' OFFICE AT: BOOK _____ PAGE _____ QUESTIONS CONCERNING THIS MATTER MAY BE DIRECTED TO THE NORTH CAROLINA DIVISION OF WASTE MANAGEMENT, SUPERFUND SECTION, DRYCLEANING SOLVENT CLEANUP ACT (DSCA) PROGRAM, OR ITS SUCCESSOR IN FUNCTION. 1646 MAIL SERVICE CENTER, RALEIGH, NC 27699-1646.

NO.	BY	DATE	REVISION
1	MWJ	11-22-13	ADDED GPS INFO ITEM #9-(2)

SURVEY PLAT - EXHIBIT "A"
TO THE NOTICE OF DRY-CLEANING SOLVENT REMEDIATION
NCDOT R/W AREA
LAWDALE DRIVE, MOREHEAD TWPSP., GUILFORD CO., NC
CONTAMINATION SOURCE: CLEANER IMAGE
DSCA #41-0001
#4711 LAWDALE DRIVE, MOREHEAD TOWNSHIP, GUILFORD COUNTY, N.C.
File #9125-DSCA-OFFSITE Date: 08-29-2013 Project P.L.S.: SSD

THE ISAACS GROUP
CIVIL ENGINEERING DESIGN AND LAND SURVEYING

8720 RED OAK BLVD. SUITE 420
CHARLOTTE, N.C. 28217
PHONE (704) 527-3440 FAX (704) 527-8335

SHEET 2 OF 2

SURVEYORS CERTIFICATE [G.S. 47-30]

I, STEPHEN S. DYER, CERTIFY THAT THIS MAP WAS DRAWN UNDER MY SUPERVISION FROM AN ACTUAL SURVEY MADE UNDER MY SUPERVISION; THAT THE BOUNDARIES NOT SURVEYED ARE CLEARLY INDICATED AS DASHED LINES, DRAWN FROM INFORMATION REFERENCED ON THE FACE OF THIS PLAT; THAT THE RATIO OF PRECISION AS CALCULATED EXCEEDS 1:10,000; THAT THIS SURVEY IS OF AN EXISTING PARCEL OR PARCELS OF LAND AND DOES NOT CREATE A NEW STREET OR CHANGE AN EXISTING STREET; THAT THIS PLAT WAS PREPARED IN ACCORDANCE WITH G.S. 47-30(f)(11) AS AMENDED; WITNESS MY ORIGINAL SIGNATURE REGISTRATION NUMBER AND SEAL THIS _____ TH DAY OF _____ 2013.

FOR REVIEW PURPOSES ONLY

STEPHEN S. DYER, PLS L-3509
N.C. FIRM LICENSE #C-1069

- LEGEND:**
- R/W RIGHT OF WAY
 - N.T.S. NOT TO SCALE
 - CSF COMBINED SCALE FACTOR
 - E/P EDGE OF PAVEMENT
 - MONITORING WELL (MW)
 - N NORTHING
 - E EASTING
 - TOC TOP OF CASING
 - TOW TOP OF WELL MANHOLE
 - △ CALCULATED PROPERTY CORNER
 - SG SOIL BORING LOCATION
 - △ DATUM CONTROL POINT
 - N/F NOW OR FORMERLY
 - SUBJECT PARCEL LINES WITH FOUND MONUMENTATION
 - - - SUBJECT PARCEL LINES PLOTTED FROM DEEDS
 - - - ADJOINER PARCEL LINES
 - - - RIGHT OF WAY LINE
 - - - CONTROL TIE LINES
 - - - FEMA FLOOD LINES

EXHIBIT B
NORTH CAROLINA DEPARTMENT OF TRANSPORTATION
LEGAL DESCRIPTION FOR PROPERTY

NCDOT R/W AREA
Former Cleaner Image Cleaners

Beginning at a point on the new westerly margin of Lawndale Drive-S.R. #2303 (Public R/W Varies), a common point with lands of KH Portfolio I, LLC (Deed Bk 6674, Page 271); Thence with the new right-of-way margin of Lawndale Drive (Public R/W Varies) the following three (3) courses and distances:

- 1) With a curve to the left having a radius of 1,435.00 feet, an arc length of 99.52 feet (subtended by a chord N. 05-23-34 W. 99.50 feet) to a found PK Nail;
- 2) N. 48-38-41 W. 103.68 feet to a found PK Nail;
- 3) S. 83-12-28 W. 134.20 feet to a point on the eastern property line of Hedges Apartments, LLC (Deed Book 4496, Page 1732); Thence with the shared line of Hedges Apartments N. 12-36-51 W. 44.43 feet to a point; Thence with the old right-of-way margin of Lawndale Drive the following two (2) courses and distances:

- 1) N. 76-55-39 E. 230.28 feet to a point;
- 2) With a curve to the right having a radius of 1397.32 feet, an arc length of 247.61 feet (subtended by a chord S. 08-08-58 E. 247.35 feet) to a point, a common corner with lands of the aforementioned KH Portfolio I, LLC property; Thence with the shared KH Portfolio line S. 85-26-18 W. 29.32 feet to a point, returning to the POINT AND PLACE OF BEGINNING, containing 20,987 square feet (0.482 Acres), more or less.

APPENDIX D

ANNUAL DSCA LAND USE RESTRICTIONS CERTIFICATION

Site Name: Cleaner Image

Site Address: 4711 Lawndale Drive, Greensboro, Guilford County, NC

DSCA ID No: 41-0001

ANNUAL DSCA LAND USE RESTRICTIONS CERTIFICIATION

Pursuant to Land Use Restriction Number _____ in a Notice of Dry-Cleaning Solvent Remediation (NDCSR) executed by _____ and recorded on _____ at the Guilford County Register of Deeds Office, K H Portfolio I, LLC hereby certifies, as an owner of at least part of the property that is the subject of the NDCSR, that the NDCSR remains recorded at the Guilford County Register of Deeds office and the land use restrictions therein are being complied with.

Duly executed this _____ day of _____, 20__.

K H Portfolio I, LLC.

By: _____
Name typed or printed:
Member/Manager

NORTH CAROLINA
_____ COUNTY

I, _____, a Notary Public of the county and state aforesaid, certify that _____ personally came before me this day and acknowledged that he/she is a Member of K H Portfolio I, LLC, and its Manager, and that by authority duly given and as the act of the corporation, the foregoing certification was signed in its name by him/her.

WITNESS my hand and official stamp or seal, this _____ day of _____, 20__.

Name typed or printed:
Notary Public

My Commission expires: _____

[Stamp/Seal]

APPENDIX E
NOTICE OF INTENT

Public Notice

SUMMARY OF NOTICE OF INTENT TO REMEDIATE A DRY-CLEANING SOLVENT FACILITY OR ABANDONED SITE

Cleaner Image
DSCA Site # 41-0001

Pursuant to N.C.G.S. §143-215.104L, on behalf of K H Portfolio I, LLC, the North Carolina Department of Environment and Natural Resources' (DENR's) private contractor has prepared a Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site (NOI). The purpose of this Summary of the NOI is to notify the community of the proposed remedy for the contamination site and invite comment on the proposed remedy.

The Cleaner Image formerly conducted dry-cleaning operations at 4711 Lawndale Drive in Greensboro, North Carolina. A portion of the property has recently been used for a road widening project of Lawndale Drive (US140). Any future redevelopment of the property will likely be for commercial purposes. Dry-cleaning solvent contamination in soil and/or groundwater has been identified at the following parcel(s):

4711 Lawndale Drive, Greensboro, Guilford County; Parcel No. 78587318043

An investigation of the extent of contamination has been completed. A risk assessment of the contaminated properties concluded that the contamination poses no unacceptable risks. A Risk Management Plan has been prepared which proposes using land-use controls to prevent current and future risks at the affected properties.

The elements of the complete NOI are included in the Risk Management Plan (RMP) which is available online at <http://portal.ncdenr.org/web/wm/DSCA/PublicNotices>.

The public comment period begins [REDACTED], 20[REDACTED], and ends [REDACTED], 20[REDACTED].

Comments must be in writing and submitted to DENR no later than [REDACTED], 20[REDACTED]. Written requests for a public meeting may be submitted to DENR no later than [REDACTED], 20[REDACTED]. Requests for additional information should be directed to Billy Meyer at (919)707-8366.

All comments and requests should be sent to:

Billy Meyer, DSCA Remediation Unit
Division of Waste Management, NC DENR
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

APPENDIX F

EXAMPLE DOCUMENTS ANNOUNCING PUBLIC COMMENT PERIOD



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

<Date>

<property owner>
<mailing address>
<city, state, zip>

Subj: Dry-Cleaning Solvent Contamination at 4711 Lawndale Drive
Greensboro, NC

Dear <property owner>:

You are receiving this letter because your property at <adjacent property address> is adjacent to an area contaminated with dry-cleaning solvents. The Dry-Cleaning Solvent Clean-up Act (DSCA) Program has completed an assessment of the dry-cleaning solvent contamination associated with the Former Cleaner Image at 4711 Lawndale Drive in Greensboro. The property is currently unoccupied. A remedial strategy to address the site contamination has been prepared, and in accordance with our program's statutes, the community has an opportunity to review and comment on the proposed strategy.

The attached Summary of the Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site (NOI) provides a brief description of the proposed remedy, a web link to the complete NOI, and the dates and procedures for commenting on the proposed remedy. If you do not have access to the internet, we ask that you contact us to request a hard copy of the complete NOI.

If you have questions, please contact me at (919) 707-8366, or Delonda Alexander at (919) 707-8365.

Sincerely,

Billy Meyer, Project Manager
DSCA Remediation Unit
Billy.meyer@ncdenr.gov

Attachments: Summary of the NOI

Cc: DSCA Site # 41-0001 File



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

<Date>

<name>, <City Manager>
<address>
<city>, NC <zip>

<name>, <County Health Director>
<address>
<city>, NC <zip>

Subj: Remediation of Dry-Cleaning Solvent Contamination
DSCA Site # 41-0001
Cleaner Image, 4711 Lawndale Drive, Greensboro

The Dry-Cleaning Solvent Cleanup Act of 1997 (DSCA), North Carolina General Statutes (N.C.G.S.) Sections 143-215.104A through 143-215.104U, provides for the assessment and remediation of properties that may have been or were contaminated by chlorinated solvents. To satisfy the requirements of N.C.G.S. 143-215.104P, this letter serves as the **Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site** (NOI) approved by the North Carolina Department of Environment and Natural Resources (DENR).

The NOI must provide, to the extent known, a legal description of the location of the DSCA Site, a map showing the location of the DSCA Site, a description of the contaminants involved and their concentrations in the media of the DSCA Site, a description of the intended future use of the DSCA Site, any proposed investigation and remediation, and a proposed Notice of Dry-Cleaning Solvent Remediation (NDCSR) prepared in accordance with N.C.G.S. Section 143-215.104M. The required components of the NOI are included in the attached Risk Management Plan, and are available on our website at www.ncdscs.org, under "Public Notices".

The DSCA Program is providing a copy of the NOI to all local governments having jurisdiction over the DSCA Site. A 30-day public comment period is being held from <date>, until <date>. Written comments may be submitted to DENR no later than <date>. Written requests for a public meeting may be submitted to DENR no later than <date>. All such comments and requests should be sent to:

Billy Meyer, DSCA Remediation Unit
Division of Waste Management, NC DENR
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

A Summary of the NOI is being published in the Mountain Times, copies are being sent to owners of property within and contiguous with the area of contamination, and a copy of the Summary will be conspicuously posted at the Site during the public comment period.

Remediation of Dry-Cleaning Solvent Contamination
DSCA Site # 41-0001
Cleaner Image, 4711 Lawndale Drive, Greensboro
Page 2

<date>

If you have any questions, please feel free to contact me at (919) 707-8366

Sincerely,

Billy Meyer, Project Manager
DSCA Remediation Unit

Attachments: Risk Management Plan

Cc: DSCA Site # 41-0001 File



North Carolina Department of Environment and Natural Resources
Division of Waste Management
Dexter R. Matthews
Director

Pat McCrory
Governor

John E. Skvarla, III
Secretary

<Date>

<property owner>
<address>
<city, state, zip>

Subj: Dry-Cleaning Solvent Contamination
<property address, city>, NC

Dear <property owner>:

The Dry-Cleaning Solvent Clean-up Act (DSCA) Program has completed an assessment of the dry-cleaning solvent contamination associated with the Cleaner Image at 4711 Lawndale Drive in Greensboro. The property is currently not occupied. A remedial strategy to address the site contamination has been prepared. You are receiving this letter in accordance with the DSCA Program's statutes, which provide the community an opportunity to review and comment on the proposed strategy. Attached is a **Summary of the Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site** which provides a brief description of the proposed remedy, a web link with more details, and the dates and procedures for commenting on the proposed remedy. We ask that you review these documents. If you do not have access to the internet, we ask that you contact us to request a hard copy.

You are also receiving this letter because your property lies within an area where dry-cleaning solvents have been detected in groundwater. An evaluation of the risks concluded that the contamination poses no unacceptable risks for the current use of your property. However, because groundwater under your property is contaminated, state regulations prohibit the installation of a water supply well on this property. If the proposed remedy is approved, a notice will be recorded in the chain of title indicating that groundwater is contaminated with dry-cleaning solvents and that regulations prohibit installation of a water supply well into a contaminated aquifer.

If you would like to see an example of this notice, please access the website: <http://portal.ncdenr.org/web/wm/DSCA/PublicNotices>, open the Risk Management Plan for the Cleaner Image site, and see Attachment [#]. If the proposed remedy is approved, you will be sent a letter describing your rights to appeal the decision to file such a notice in the chain of title, and providing you the option of filing the notice yourself.

Dry-Cleaning Solvent Contamination
4711 Lawndale Drive, Greensboro, NC
DSCA Site # 41-0001
Page 2

<date>

If you have questions, please contact me at (919) 707-8366, or Delonda Alexander at (919) 707-8365.

Sincerely,

Billy Meyer, Project Manager
DSCA Remediation Unit
Billy.Meyer@ncdenr.gov

Attachments: Summary of the NOI

Cc: DSCA Site # 41-0001 File