

Chattahoochee Brick Company Site Remediation
Scope of Work
April 21, 2026

Introduction

The City of Atlanta is seeking an environmental remediation contractor to conduct remediation activities at the Chattahoochee Brick Company (CBC) site. This cleanup is funded with a FY23 Bipartisan Infrastructure Law (BIL) EPA Brownfield Cleanup Grant with a grant period of October 1, 2023, to September 30, 2027. The remediation must meet the grant requirements specified in Cooperative Agreement 02D61223 with the Environmental Protection Agency (EPA) and ensure compliance with the State of Georgia Environmental Protection Division (EPD) Georgia Brownfield Program requirements.

The City of Atlanta may amend or extend this contract beyond the initial terms to accommodate the terms and conditions of future EPA grants awarded to the City of Atlanta or additional funds from other sources allocated to this project, provided a market survey conducted by the City of Atlanta indicates that the prices the contractor proposes are reasonable at the time the work will be performed.

The Chattahoochee Brick Company Site Background

The CBC site, located at 3195 Brick Plant Road in the Chattahoochee neighborhood in northwest Atlanta, is composed of three parcels totaling 75.4 acres. The site has been vacant/unoccupied since 2010. Gas line easements and sewer lines exist on the south, east, and northeast sides of the site. Concrete foundations of former on-site structures, paved areas, and roadways are present throughout the site. The paved areas are surrounded by wild regrowth of weeds, trees, and other vegetation re-establishing natural wetlands and meadows.

In 2022, the City of Atlanta purchased the site and placed it under the purview of the Departments of Watershed Management (DWM) and Parks and Recreation (DPR). Site remediation, floodplain restoration, conversion to a public park with greenspace, recreational trails, park facilities, a memorial to convict leasing, and preservation of the remnants of pre-1909 buildings present during the convict leasing period are all anticipated. Visioning and planning for the site reuse are currently underway.

Chattahoochee Brick Company Site Previous Assessments and Remediation

The Chattahoochee Brick Company and General Shale manufactured brick from the 1890s to the 2010s. After Brickmaking operations ceased and the buildings were demolished in the 2010s, General Shale offered the site for sale. In 2016, Lincoln Terminal intended to build a 24-hour rail-to-truck terminal including several large bulk fuel storage tanks at the site. In 2020, Lincoln Terminal partnered with Norfolk Southern Railway Company (NSRC) to build the Chattahoochee Thoroughbred Bulk Transfer (TBT) Facility to move ethanol, oil, and commodities between trains, trucks, and pipelines.

Prior to and during the course of the development planning, several Environmental Site Assessments conducted as part of the leasing and development process identified four Areas of Concern (AOC) with one or more contaminants present in soils at concentrations greater than the GA Environmental Protection Division (EPD) Type 3 Risk Reduction Standards (RRS). Lead was identified in soils in all AOCs, while two other metals, three SVOCs, and/or one VOC were identified in the AOCs. The contaminants of concern (COCs) include:

- **AOC-1:** An area approximately 24,400 square feet in size and located on a ridge with 15 to 30 feet of fill. Contaminants of concern (COCs) include lead, cadmium, benzene, non-aqueous phase liquid (NAPL), methane, and VOC vapor encroachment.
- **AOC-2:** An area approximately 8,000 square feet in size, which was identified as having high lead concentrations in soil.
- **AOC-3:** An area approximately 183,000 square feet in size, located in the floodplain. COCs include elevated lead, methylene chloride, and bis(2-ethylhexyl) phthalate concentrations in soil.
- **AOC-4:** An area approximately 192,000 square feet in size, located in the floodplain. COCs include lead, arsenic, cadmium, and benzo(a)pyrene.

A Prospective Purchaser Corrective Action Plan (PPCAP), dated September 23, 2020, summarized the previous assessments conducted at the site. The property was entered into the GA EPD Brownfield Program in November 2020. The CAP cleanup standard consisted of a Type 5 RRS that allowed for the impacted soil to remain in place above non-residential clean-up standards at a depth below a 1-foot of the surface barrier.

In 2021, with remediation underway, NSRC cancelled its project due to community opposition. PPCAP Amendment No. 1 was submitted to GA EPD to revise the soil corrective action plan, to propose RRS for worker protection to be used under a property-wide Type 5 remedy. The revised cleanup plan included excavation and disposal of impacted surface soil (0-1 feet below the ground surface [bgs]) in exceedance of Type 3 and Type 4 RRS to limit exposure to soils beneath the cap. Areas of remaining impacted soils would be capped with a surface barrier (cap) of a minimum one-foot thickness of clean soil and/or crushed brick. A brightly colored demarcation barrier was placed beneath the cap. A Compliance Status Report (CSR) dated December 30, 2021, states that the overall property was brought into compliance for non-residential use through the implementation of a Type 5 capping remedy for soil across the entire site. A total of 17,558 tons of impacted soil was excavated and sent for off-site disposal during the referenced removal action.

EPA Brownfield Cleanup Grant

The City of Atlanta's EPA FY23 Brownfield Cleanup Grant application (EPA Cooperative Agreement #02D61223) was selected for an award with a project period October 1, 2023, to September 30, 2027. The City of Atlanta issued a Procurement for a Qualified Environmental Professional (QEP) to develop and guide the remediation of the Chattahoochee Brick Company (CBC) Site. CHA Consulting, Inc. (CHA), the selected QEP, developed the cleanup plan and will oversee brownfield remediation of the CBC site.

Based on assessment and remediation documentation prepared by others, CHA prepared a *Historic Site Characterization Activities, Conclusions, and Recommendations* (November 2024) summarizing the previous Environmental Site Assessments, Corrective Action Plan (and amendment), the Compliance Status Report, current status and remaining contamination, identified areas for additional investigations and recommended retaining the Type 5 remedial approach to meet the Type 1 RRS in the 0 to 1 foot surface soils. This report is included in the project manual as information for bidders.

CHA then performed a pre-design investigation consisting of collecting and analyzing soil samples at various locations throughout the site to attempt to delineate the limits of required excavation and off-site disposal of soils and presented its results and recommendations in the *Design Phase Investigation and Soil*

Characterization Report for the Chattahoochee Brick Company Site (October 7, 2025). The report is included in the project manual as information for bidders.

This investigation was completed to assess the environmental status of the CBC site relative to known exceedances of the Type 1 RRS in surface soils previously not investigated. Activities completed included:

- A. Collecting delineation soil samples around soil boring SB-18 for lead and polychlorinated biphenyl (PCB) analysis.
- B. Collecting delineation soil samples around four parent sample locations in Area of Concern (AOC) AOC-1, and four parent samples located outside the designated AOCs for specific parameters historically found to exceed the Type 1 RRS.
- C. Collecting surface soil samples in AOC-2 for evaluation of surface soils in comparison to the Type 1 RRS.
- D. Collecting delineation samples offset from previously completed excavation boundaries in AOC-3 and AOC-4 for lead analysis in comparison to the Type 1 RRS.
- E. Collecting bulk density soil samples to assist in developing remedial disposal costs.

Additional design phase investigation was conducted to delineate the SB-18 and Tree Area in AOC 4 was completed in March 2026

The results, summarized below, determine the limits of the soil removal for the purposes of the design of the EPA-funded site cleanup.

- **AOC-1:** CHA estimates 230 cubic yards of soil impacted with Contaminants of Concern (COC) above the Type 1 RRS require excavation and off-site disposal in this area of concern.
- **AOC-2:** CHA estimates 60 cubic yards of soil impacted with COCs above Type 1 RRS require excavation and off-site disposal in this area of concern.
- **AOC-3:** Soil samples collected from surficial soil (0-1 foot bgs) offset from the central area of the AOC, south of the petroleum pipeline easement and north of the southern excavation limits exceeded the Type 1 RRS for lead, indicating that additional remedial soil excavation is required in the central area of AOC-3 extending toward the west property boundary and petroleum pipeline easement. CHA estimates approximately 520 cubic yards of soil impacted with COCs above the Type 1 RRS require excavation and off-site disposal in this area of concern.
- **AOC-4:** Soil samples collected from surficial soil (0-1 foot bgs) offset from the southeast and southern excavation limits exceeded the Type 1 RRS for lead, indicating that additional remedial soil excavation is required in the southern and southeast area of AOC-4 extending to the property boundary/Proctor Creek in the southeast area of the Subject Property. CHA estimates approximately 2,680 cubic yards of soil impacted with COCs above Type 1 RRS require excavation and off-site disposal in this area of concern. Note that this estimate includes the removal of impacted soils in a ~0.65-acre area located within a wooded fenced areas located in the Southwest corner of the property.
- **Boring SB-18 Area:** CHA estimates that approximately of 2,500 cubic yards of additional soil with PCBs may require removal from the subsurface soils surrounding SB-18. An additional design phase investigation was conducted on March 2026 to determine the limits of the excavation and determine what percentage of this volume will require disposal as hazardous waste under the

Toxic Substances Control Act (TSCA) due to the presence of PCB concentrations greater than or equal to 50 parts per million (ppm).

- **Boring GP-6 Area:** CHA estimates 80 cubic yards of soil impacted with COCs above Type 1 RRS require excavation and off-site disposal in this area of concern.
- **Boring GP-12 Area:** CHA estimates 60 cubic yards of soil impacted with COCs above Type 1 RRS require excavation and off-site disposal in this area of concern.
- **Boring SB-30 Area:** CHA estimates that 170 cubic yards of surface soil impacted with chromium above the Type 1 RRS require excavation and off-site disposal.
- **Bulk Density Sampling:** the bulk density of the on-site soil/materials ranged from 1.2 to 1.6 grams per cubic centimeter (g/cm³).

In summary, CHA estimates approximately 3,800 cubic yards or an estimated 5,700 tons of soil require excavation and proper off-site disposal to bring surface soils into compliance with Georgia EPD Type 1 residential RRS in the areas shown in the attached map. In addition, CHA estimates that approximately 2,500 cubic yards of additional soil with PCBs may require removal from the subsurface soils surrounding SB-18.

EPA FY23 Brownfields Cleanup Grant Scope of Work

EPA Project Officer Substantial Involvement - The EPA Project Officer will be substantially involved in overseeing and monitoring this Cleanup grant. The City of Atlanta, QEP, and the contractor will have regular meetings with the Project Officer to discuss compliance with the work plan. The Project Officer will be notified as soon as problems, delays, or adverse conditions are known that might delay the ability to meet the outputs/outcomes in the Scope of Work. The Contractor will work closely with the City of Atlanta Project Manager, the QEP, and the EPA Project Officer in the successful implementation of CBC Cleanup Grant Scope of Work Tasks, as described below:

Task 1: Project Management and Reporting

Task 2: Community Involvement

Task 3: Brownfield Cleanup Planning

Task 4: Cleanup Implementation and Completion

Task 1- Project Management and Reporting

The Contractor will work with the QEP and the City of Atlanta Project Manager to complete the Program Management and Reporting requirements listed in this section.

- Kick-off Meeting:** The City of Atlanta Project Manager, the QEP, the EPA Project Officer, and the Contractor will participate in a project kick-off meeting to review the remediation scope, roles, responsibilities, and schedule. Additional team meetings during the contract period are anticipated.
- Final Performance Reporting/Closeout report:** In accordance with EPA regulations 2 CFR Parts 200.344, a Final Cooperative Agreement Performance Report is required within 120 days after the expiration or termination of the approved project period. This report will include a summary of the activities completed with EPA funds, performance outcomes/outputs, description of problems

encountered, comparison of actual accomplishments with the anticipated ones, project schedule and milestones, and the budget summary during the entire grant project period, including the last quarter. The Contractor will provide information regarding the remediation to be included in the Final Performance Report, including but not limited to waste disposal manifests/bill of lading, OSHA training certificates for all staff, and certified payrolls for all prime contractors and subcontractors to verify Davis Bacon Compliance.

Task 2: Community Involvement

Community Involvement is an essential component of the City of Atlanta's (City) Environmental Protection Agency (EPA) Brownfields Cleanup Grant. As required by the Cooperative Agreement, the community must be informed of the funded cleanup activities per a site-specific Community Involvement Plan (CIP). The CIP provides specific opportunities for the public to be informed and provide comments on the proposed cleanup options that will be considered for the site. The Contractor will participate in the community engagement activities listed below.

- A. **Community Meetings:** Community meetings will be held prior to, during, and immediately following the completion of the cleanup activities. Community meetings will be held near the CBC site. The Contractor will attend and present information about the CBC remediation at said community meetings.

Task 3: Brownfield Cleanup Planning

- A. **Federal Cross-Cutting Requirements:** EPA requires compliance with Federal Cross-cutting requirements including but are not limited to OSHA Worker Health & Safety Standard 29 CFR 1910.120; National Historic Preservation Act; Endangered Species Act; and Permits required by Section 404 of the Clean Water Act; Executive Order 11246, Equal Employment Opportunity, and implementing regulations at 41 CFR 60-4; Contract Work Hours and Safety Standards Act, as amended (40 USC § 327-333) the Anti-Kickback Act (40 USC § 276c) and Section 504 of the Rehabilitation Act of 1973 as implemented by Executive Orders 11914 and 11250.
 - 1. National Historic Preservation Act-Section 106: As part of compliance with the National Historic Preservation Act, New South Associates, a subcontractor to CHA, completed the *Cultural Resources Assessment, Chattahoochee Brick Company Site Brownfield Investigation*. After reviewing the archaeology of the CBC and the areas requiring remediation, their recommendation for AOC-2 is: This AOC is located in the former Industrial area, and remediation may impact industrial resources. Archaeological monitoring is recommended. The monitor should record industrial features that may be exposed, but these features would not require further treatment. The monitor should be alert to the potential presence of pre-contact features, which would require documentation and evaluation. In addition, given the unknown location of the "temporary cemetery" as well as the potential for unmarked graves on the property as a whole, a human remains response plan will be prepared before remediation should human remains inadvertently be discovered. None of the AOCs are in locations where cemeteries are believed to have been present, and they do not require special treatment. The Contractor will work with the QEP and New South to implement *the Human Remains Discovery Plan*. The plan will be included in the project manual/bid documents and will identify what steps to take to be observant of human remains and subsequent actions should they be encountered.

2. Compliance with the Davis-Bacon Act of 1931: The remediation must comply with Davis-Bacon (DB) Act prevailing wage requirements and associated U.S. Department of Labor (DOL) regulations for all construction, alteration, and repair contracts and subcontracts awarded. All laborers and mechanics employed by contractors and subcontractors are covered by Davis Bacon requirements for all construction work performed at the CBC site. *Recent and applicable wage rates are available at the U.S. Department of Labor (as posted on <https://www.dol.gov/whd/programs/dbra/>)*

The QEP and/or its subconsultant will work with the Contractor to verify that it and any subcontractors comply with DB provisions. A sufficient number of employees will be interviewed to verify that the appropriate wage rates are being paid by contractors and subcontractors. Interviews will be recorded in Standard Form 1445. Certified payroll documentation must be provided by all on-site workers. The QEP will review payroll data for DB compliance and attach certified payroll documentation to a final DB Compliance report.

Task 4: Cleanup Implementation and Completion

- A. **Completion of Cleanup Activities:** The Contractor will prepare and follow its own OSHA-compliant Health and Safety Plan and Environmental Management Plan and will provide it to QEP and City for review. The QEP will monitor the site cleanup that will be conducted by the remediation contractor.
 - a. Task: Prepare Health and Safety Plan Prior to beginning corrective action work, site-specific Health and Safety Plans (HASPs). These documents will outline potential hazards, the level of personal protection to be used, and the procedures to be followed for monitoring and emergency situations at the Subject Property. It is assumed that the fieldwork will be performed in Level D personal protection (i.e. steel-toed boots and hard hats). The contractor's personnel and subcontractors shall meet the requirements of the Occupation and Safety and Health Administration (OSHA) Standard 1910.120.
- B. **Excavation and Off-site Disposal of Contaminated Soils (this is from recent ABCAs):** Contaminated soils as identified in the *Design Phase Investigation and Soil Characterization Report for the Chattahoochee Brick Company Site (October 7, 2025)* and summarized below and illustrated in the map will be excavated, characterized for disposal, and properly disposed of off-site at a properly permitted facility. As previously indicated, based on the delineation activities performed at the Site, CHA estimates that approximately 3,800 cubic yards or an estimated 5,700 tons (based on a bulk density range of 1.2 to 1.6 grams per cubic centimeter) of soil require excavation and off-site disposal across AOCs and additional corrective action areas.
 - **AOC-1:** 230 cubic yards
 - **AOC-2:** 60 cubic yards
 - **AOC-3:** 520 cubic yards
 - **AOC-4:** 2,680 cubic yards
 - **Boring SB-18 Area (PCBs):** ≥2,500 cubic yards (currently assumed that at least 100 cubic yards will require management as TSCA hazardous waste)
 - **Boring GP-6/ Boring GP-12/Boring SB-30 Areas:** ~310 cubic yards combined

Contaminated Soil Disposal Records: Remediation and transport of excavated soil shall be completed in accordance with federal, state, and local rules and regulations, specifically, regulations 49 CFR, Subtitle B, OCGA 391-3-19, 46- 11 and City of Atlanta Code of Ordinance Chapter 74 and 150. Approval from the disposal facility for acceptance of waste materials shall be obtained in writing before transporting excavated soil from the Subject Property. The Field Team Leader or field sampling team will record the following to document proper disposal of contaminated soil leaving the Subject Property:

- Waste Profile(s) and associated profile number(s) from the receiving landfill(s)
- Waste manifest numbers.
- Disposal ticket numbers and associated tonnage
- Transporter company and truck number

The following actions are part of the site remediation:

1. Obtain final land disturbance permit in coordination with CHA.
2. Installation of site controls at the Site, including the survey and marking of utilities and predetermined excavation areas, installation of temporary construction fencing and erosion controls around the perimeter of the proposed excavation areas and associated staging areas. Additionally, the perimeter of the proposed excavation area will be protected to reduce the potential for surface water from draining into the excavation.
3. The construction of a temporary soil containment pad(s) and decontamination pad, as appropriate.
4. Tree removal in the ~.65 acre wooded fenced area at the Southwest corner of the site per process to be determined.
5. Excavation of contaminated/source soils delineated in each AOC and sampling location as detailed in the *Design Phase Investigation and Soil Characterization Report (October 7, 2025) for the Chattahoochee Brick Company Site* and direct loading of material in dump trucks, dump trailers, and/or roll-off containers for proper off-site disposal at a Subtitle D (non-hazardous waste) landfill.
6. TSCA soils near the former boring SB-18 with PCB concentrations greater than or equal to 50 ppm will require off-site disposal at a properly permitted Subtitle C (hazardous waste) landfill.
7. The contractor shall collect waste pre-characterization samples before commencing with the excavation activities and obtain written authorization for the selected disposal facility to accept the waste, the material requiring off-site disposal will be directly loaded into dump trucks/trailers for transport to a Subtitle D (non-hazardous) or Subtitle C (hazardous) landfill/disposal facility, as appropriate.

If unplanned materials are encountered during the excavation activity, the material will be placed on temporary soil containment pads while awaiting characterization and approval by the disposal facility. Soils requiring off-site disposal and temporarily staged on-site will be covered with polyethylene sheeting that is properly secured.

While not anticipated, any soil requiring dewatering before transport to the disposal facility will also be placed on a temporary containment pad and covered until it is shipped off-site. Water that accumulates on the containment pad, if any, will be placed into drums for waste characterization and off-site disposal.

8. Confirmation soil sampling will be performed by CHA.
9. Placement of demarcation barrier in excavated areas.

10. Clean fill will be imported into the Site and placed in the excavation to match the surrounding grades. Clean fill will demonstrate compliance with Georgia Type 1 RRS for surface soils.
11. Following the completion of the backfilling areas, The disturbed areas will then be seeded and mulched to establish vegetative cover.

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