QuikTrip #7185 Site Ashville, Alabama ADEM VCP Site #: 461-115-25003

Fact Sheet

An initial Voluntary Cleanup Program (VCP) Cleanup Plan has been found to be technically adequate by the Alabama Department of Environmental Management (ADEM) for **QuikTrip #7185 Site** in Ashville, Alabama. This fact sheet has been prepared to briefly advise the public of the principal legal and policy issues of the VCP.

I. VCP PROCESS

The VCP provides a mechanism for the implementation of a cleanup program that encourages applicants to voluntarily assess, remediate, and reuse rural and urban areas of actual or perceived contamination. The program does not relieve any "responsible person" for the liability for administrative, civil, or criminal fines or penalties which are otherwise authorized by law and imposed as a result of the illegal or unpermitted disposal of solid waste, hazardous waste, hazardous constituents, hazardous substances, petroleum products, and/or pollutants to the land, air, or waters of the State on an identified property. The program is designed to expedite the voluntary cleanup process and has been designed for entry at any stage of the cleanup process as long as all applicable criteria have been met up to the point of entry.

II. PROCEDURES FOR REACHING A FINAL DECISION

ADEM is proposing to issue for QuikTrip #7185 Site a Cleanup Plan for the site remediation. The Cleanup Plan includes a proposal to remove any impacted soils that are encountered during any excavation activities. This plan also stipulates that the facility must address groundwater contamination at the site through submitting a draft environmental covenant for the site. A Vapor Intrusion plan will also be implemented for any structures that will be built on-site.

ADEM Admin Code R. 335-15-6-.02 requires that the public be given a 30-day comment period from the date of the notice. The comment period will begin on June 9, 2025 which is the date of publication of the public notice in major local newspaper(s) of general circulation and will end on July 9, 2025.

All persons wishing to comment on any of the conditions of the VCP Remediation should submit their comments in writing to ADEM, Permits and Services Division, 1400 Coliseum Blvd. (Zip 36110). P.O. Box 301463 (Zip 36130-1463) Montgomery, Alabama, ATTENTION: Mr. Russell Kelly. Written comments on the VCP activities should be submitted to ADEM and be received by 5:00 p.m. on July 9, 2025.

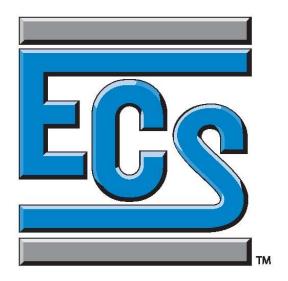
ADEM will consider all written comments received during the comment period while making a final decision on this issue. When ADEM makes its final decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final decision.

III. FACILITY DESIGN

ECS Southeast, LLC (ECS) has completed site investigation activities under the VCP at the QuikTrip #7185 Site located at Hwy 231 West and Interstate 59 in Ashville, AL. Currently the property is a vacant lot. ECS proposes to remove any contaminated soil that is encountered during the construction of the new convenience store, and it will be disposed of off-site at an appropriate facility. QuikTrip will submit an environmental covenant to restrict groundwater use at the site. Furthermore, a Vapor Intrusion Plan will be implemented for any structures that are built on-site.

IV. TECHNICAL CONTACT

Ben King, Project Manager
Engineering Services Section
Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard (Zip 36110)
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VOLUNTARY CLEANUP PLAN VCP SITE NO. 461-115-25003

QUIKTRIP #7185 SITE
HIGHWAY 231 WEST AND INTERSTATE 59
ASHVILLE, ST. CLAIR COUNTY, ALABAMA
ECS PROJECT 49:22304-A

PREPARED FOR: QUIKTRIP CORPORATION

&

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMET BROWNFIELD REDEVELOPMENT & VOLUNTARY CLEANUP PROGRAM

APRIL 17, 2025 REVISED MAY 13, 2025



Geotechnical • Construction Materials • Environmental • Facilities

April 17, 2025; Revised May 13, 2025

Mr. Ben King Voluntary Cleanup Program Alabama Department of Environmental Management 1400 Coliseum Boulevard Montgomery, Alabama 36110

And

Mr. Justin Coons QuikTrip Corporation 4705 South 129th East Avenue Tulsa. Oklahoma 74134

Subject: Voluntary Cleanup Plan

QuikTrip #7185 Site

Voluntary Cleanup Program VCP Site No. 461-115-25003 ECS Project No. 49:22304-A

Dear Mr. King:

On behalf of QuikTrip Corporation (QuikTrip), ECS Southeast, LLC (ECS) is pleased to provide you with this Voluntary Cleanup Plan (Plan) for the above-referenced site (subject property). This Plan is based on the assessment activities that were implemented in general accordance with the Alabama Department of Environmental Management (ADEM) Voluntary Cleanup Program (VCP) and documented within the Site Assessment Report, dated March 27, 2024, as well as the ADEM response to our report provided within the letter dated December 18, 2024. If there are any questions regarding this Plan, or a need for additional information, please don't hesitate to contact us at the numbers listed below.

Sincerely,

ECS SOUTHEAST, LLC

fun and

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Environmental Assistant Department Manager

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Figure 3 Proposed Development Plans

Figure 4 Soil Analytical Results

Figure 5 Groundwater Analytical Results

Table 1 Summary of Soil Analytical Data – March 2024

Table 2 Summary of Groundwater Analytical Data – March 2024

1.0 EXECUTIVE SUMMARY

1.1 Site Description

The subject property is located at Highway 231 West and Interstate 59 in Ashville, St. Clair County, North Carolina (**Figures 1** and **2**). According to the St. Clair County Geographic Information System (GIS) website, the subject property is identified as Parcel Identification Number (PIN) 0507360001007000 and is owned by Richard A. Giangrosso. The subject property consists of approximately 6.37-acres of undeveloped, grassed land.

Historically, it appears that the subject property was previously undeveloped, wooded, and agricultural/pasture land from at least 1889 through 1975. Around 1981, the subject property was cleared. Around 1990, the subject property was cleared and developed with an apparent storage or agricultural structure on the northwest corner through 2006, which was demolished between 2006 and 2011. Since 2011, the subject property has remained cleared, unimproved land.

1.2 Future Land Use

ECS Southeast, LLC (ECS) understands that QuikTrip Corporation has acquired/is in the process of acquiring the subject property and will redevelop the subject property for use as QuikTrip convenience store. Based on the available site plans, ECS understands that the proposed development will include an approximately 8,300 square foot convenience store/truck stop, with two (2) underground storage tank pits, two (2) fuel dispenser areas with multiple pump islands, two (2) pump island canopies, and a truck weight scale, with the balance of the proposed development consisting of pavement, sidewalks, curbs, utilities to support the petroleum retail operations, and a stormwater retention pond. The proposed development plans are included in **Figure 3**.

2.0 PREVIOUS ASSESSMENTS

ECS was previously contracted by QuikTrip to conduct a Phase I Environmental Site Assessment (Phase I ESA) and Limited Phase II for the subject property dated March 27, 2024 (ECS Project No. 49:22304). During the completion of the Phase I ESA, ECS completed a review of historical information for the adjoining or nearby properties. Based on historical documentation, the nearby properties previously consisted of rural residential land that transitioned to increasingly commercial use in the 1950s and 1970s with the construction of US 231 and the northern adjoining shopping center, occupied by Imperial Cleaners since the 2000s.

During the assessment, sixteen Standard Penetration Test (SPT) soil borings (B-1, B-2, C-1 through C-4, D-1 through D-8, T-1 and T-2) were advanced on the subject property to investigate potential soil and groundwater impacts at the subject property. The SPT borings were advanced using split spoon sampling and auger techniques to varying depths ranging from ten (10) feet below ground surface (ft-bgs) up to a maximum depth of thirty (30) ft-bgs. Intermittent soil samples were collected from each soil boring location using a one-and-a-half-foot split spoon sampler. The soil samples were screened in the field for volatile organic vapors using a photoionization detector (PID). One (1) soil sample from each boring was submitted to an accredited laboratory for chemical analysis of benzene, toluene, ethylbenzene, xylenes (BTEX), and methyl tert-butyl ether (MTBE) using Environmental Protection Agency (EPA) Method 8260 and total petroleum hydrocarbons (TPH) diesel range organics (DRO) using EPA Method 8015D.

After the collection of the soil samples, four (4) borings (T-1, T-2, D-7, and D-8) were advanced into the groundwater table at varying depths ranging from 20 ft-bgs to a maximum depth of 30 ft-bgs, and temporary monitoring wells were installed to facilitate collection of groundwater samples. On March 7, 2024, ECS collected a groundwater sample from each of the four (4) temporary monitoring wells using a dedicated polyethylene bailer and nylon rope. The groundwater samples were submitted to an accredited laboratory for analysis of volatile organic compounds (VOCs) using EPA Method 8260D and TPH-DRO using EPA Method 8015C.

A review of the laboratory analytical report of the soil and groundwater samples identified the following:

- Soil samples C-4, D-2, and D-6 contained TPH-DRO at concentrations exceeding the laboratory reporting limit. TPH-DRO does not have an established EPA Regional Screening Level (RSL) for soil.
- Groundwater sample D-8 contained tetrachloroethene (PCE) and trichloroethene (TCE) at concentrations exceeding their respective EPA Maximum Contaminant Level (MCLs).
- In groundwater samples D-8 and D-7, bromoform, 1,2-dichloroethane, and/or cis-1,2-dichloroethane were detected at concentrations exceeding their respective laboratory reporting limits, but below their respective EPA MCL.
- In groundwater samples T-1 and D-7, methylcyclohexane was detected at a concentrations exceeding its laboratory reporting limit; however the EPA currently does not have an established standard for methylcyclohexane in groundwater.

The soil boring/sample and groundwater sample locations are provided on **Figures 4** and **5**, respectively. The analytical results for the soil and groundwater samples collected during the March 2024 assessment are summarized in **Tables 1** and **2**. The full laboratory analytical reports are included in **Appendix A**.

Based on the results of the assessment activities above, and the findings of the Phase I ESA, ECS identified the following recognized environmental conditions (RECs) in connection with the subject property:

- ECS considered the north adjoining drycleaning facility (Imperial Cleaners) that has operated since the 2000s to represent a REC.
- ECS considered the documented PCE and TCE impacts identified in groundwater at the subject property above regulatory standards to represent a REC.

Based on the results of the assessment activities, QuikTrip submitted an application to enter the subject property into the ADEM VCP. The application was approved on November 25, 2024, by Ms. Crystal Collins of the ADEM, and was assigned VCP Site No. 461-115-25003.

3.0 PROPOSED DEVELOPMENT PLAN

This Plan has been prepared to facilitate activities that are necessary to redevelop the subject property in accordance with QuikTrip's current development plans (Figure 3) and includes the procedures for excavating and managing soils as necessary to prepare the subject property for redevelopment. Generally speaking, the majority of the on-site soils are expected to be designated as "non-impacted" (i.e., below EPA Soil Screening Levels) based on the findings of our sampling activities to date. ECS understands that QuikTrip proposes to dispose of identified impacted soils in the areas of the proposed underground storage tank (UST) basin and retention pond, if encountered during the excavation, at an off-site landfill which is certified to receive the soils. A high percentage of the on-site surface area will then be capped with an impervious surface, thus reducing/eliminating direct contact exposure.

Based on data collected during the March 2024 assessment, the depth to groundwater at the subject property ranged from approximately two (2) ft-bgs, in temporary monitoring well T-1, to 7.6 ft-bgs, in temporary monitoring well D-7. As a result, excavation into the water table is anticipated for the UST basin and potentially for foundation footing installation for the proposed redevelopment of the subject property. If encountered, impacted groundwater and stormwater will be managed as described in *Section 8.0*.

Site Civil preparation activities within the scope of the Plan are defined to comprise:

- General grading and balancing of the subject property with on-site material;
- The excavation of soil for the installation of the proposed foundation footings;
- The excavation of soil for the installation of the proposed storm water retention pond; and
- The excavation of soil for the proposed UST basin and utility chase corridors.

On-site excavations will be backfilled with the excavated soils, as long as they are deemed structurally sufficient, or with non-impacted soil imported from off-site sources.

The subject property will be utilized for commercial purposes and is not planned to be utilized for residential purposes at this time. We understand that an Environmental Covenant will be recorded at a later date.

4.0 PROJECT NOTIFICATIONS AND CONTENT PROCEDURES

4.1 ADEM Notification

This Plan, which will require approval by ADEM, will be implemented during redevelopment activities by QuikTrip. Disturbance of on-site soils after completion of redevelopment will be subject to the ADEM Land Use Controls (Land Use Restrictions), if applicable. The ADEM will be notified at least four (4) days prior to the initiation of field activities discussed in this document.

4.2 Areas of Identified Soil Impacts

On-site soils were assessed during the March 2024 soil and groundwater assessment activities (*Section 2.0*). Review of the laboratory analytical data identified concentrations of TPH-DRO in on-site soils at concentrations that do not appear to warrant special handling. TPH-DRO does not have an established EPA Regional Screening Level (RSL) for soil.

The soil sample locations are presented on Figure 4 and the analytical data is summarized on Table 1.

4.3 Areas of Identified Groundwater Impacts

Four (4) groundwater samples were collected from the subject property—one (1) each at boring locations D-7, D-8, T-1, and T-2. Review of the laboratory analytical data identified PCE and TCE, in groundwater sample D-8, at concentrations exceeding their respective EPA MCLs. Additionally, bromoform and cis-1,2-dichloroethene were identified in the groundwater sample collected from location D-8 at concentrations below their respective EPA MCLs. Methylcyclohexane was identified in the groundwater sample collected from location T-1 at a concentration exceeding the laboratory reporting limit. Currently, the EPA does not have an established MCL for methylcyclohexane.

The groundwater sample locations are presented on **Figure 5**, and the analytical data is summarized on **Table 2**.

4.5 Previously Unidentified or Unforeseen Conditions

Previously unidentified or unforeseen conditions are defined to mean of impacted soil or groundwater documented (during redevelopment) through normal and routine field observations, field detection instruments, or laboratory analyses, or displaying characteristics different from other non-affected media in the area being worked. These characteristics are typically expected to be triggered by direct observations (staining and/or odors) or the use of an Organic Vapor Analyzer (OVA), PID, or similar device.

If previously unidentified or unforeseen conditions are encountered during site development, it is each worker's obligation to report such conditions to their immediate supervisor who will, in-turn, notify the Project Superintendent identified on the Project Contact List in the following section (Section 5). The Project Superintendent will then notify the Site Environmental Representative. The protocol presented herein will then be implemented by QuikTrip as applicable and appropriate, to manage the proper resolution of said conditions.

5.0 OBJECTIVE OF THE VOLUNTARY CLEANUP PLAN

The objective of the Voluntary Cleanup Plan is to describe the procedures to be followed during the disturbance (excavation, grading, and placement of fill) of soil at the subject property. The reason for the soil disturbance is to prepare the subject property for grading and construction activities during redevelopment of the subject property. At the completion of redevelopment activities, the subject property will be developed with a QuikTrip convenience store.

5.1 Project Contact List

Contact for implementation of this Plan should be made directly with the Project Superintendent or, in his absence, the Site Environmental Representative. Project Contacts are (contact in the order listed):

On-Site Contacts:

Project Superintendent:

TBD

Off-Site Contacts:

Site Environmental Representative:
Mr. Christopher Orrell
ECS Southeast, LLP
1812 Center Park Drive, Suite #D
Charlotte, North Carolina 28217
704-525-5152
correll@ecslimited.com

<u>Developer's Representative:</u>

Justin Coons, Environmental Manager QuikTrip Corporation 4705 South 129th East Avenue 918-210-0360 jcoons@quiktrip.com

5.2 Reporting

In addition to the requirements to consult with or obtain approvals for actions under this Plan, if unidentified and unexpected conditions are encountered, ADEM should be notified prior to field activities, discussed herein, which are conducted in the area of the unidentified and unexpected condition(s). Also, contractors and sub-contractors must report those conditions immediately to the Project Superintendent or, in his absence, to the Site Environmental Representative. The responsibility of notification to ADEM and other external parties lies solely with QuikTrip and/or with ECS acting on their behalf.

The ADEM Project Manager for this site is:

Mr. Ben King Voluntary Cleanup Program Alabama Department of Environmental Management 1400 Coliseum Boulevard Montgomery, Alabama 36110

Phone: 334-394-4330

5.3 Deviation from Approved Plan

This Plan is intended to be dynamic and to be adapted to specific and actual site conditions. Accordingly, should such conditions warrant a change, either by addition, deletion, or modification of a procedure, such may be accomplished with agreement among the Project Superintendent, the Site Environmental Representative, and the Developer's Representative, after consultation with, and subject to approval by, the ADEM contact. Such changes will comply with applicable local, State, and Federal rules and regulations. A written amendment shall be prepared and submitted to ADEM for approval (the use of email correspondence shall suffice for approval, followed by a hard copy or electronic copy provided prior to implementation. Amendments must have the approval of the ADEM prior to implementation. Approved amendments shall be included as an Appendix to this Voluntary Cleanup Plan.

6.0 HEALTH & SAFETY CONSIDERATIONS

Work by each site contractor and site sub-contractor must be accomplished within the framework of an appropriate Site-Specific Health and Safety Plan (HASP).

Level D Personal Protect Equipment (PPE), which includes hard-hats, steel-toed safety boots, safety glasses with side-shields, and high-visibility safety vests, is the minimum level of PPE to be used for site work. Truck drivers who exit their trucks on-site will be subject to the health and safety requirements established for the subject property.

QuikTrip, via ECS, will make available to contractors and sub-contractors the due diligence data (Section 2.0) so that informed and responsible decisions can be made by those contractors and sub-contractors regarding the health and safety of their employees.

Each site contractor and site sub-contractor performing work related to soil handling must prepare its own Site-Specific HASP. Each HASP shall demonstrate that their work activities will not cause adverse exposures to their employees or the surrounding public areas. Each contractor and sub-contractor are specifically and wholly responsible for the safety of their workers, including any PPE and training, as may be warranted or required by local, State, and Federal rules and regulations. QuikTrip and ECS are responsible only for the safety of their respective employees.

7.0 PROVISIONS FOR HANDLING SOIL

7.1 Soil Management Procedure

Site soils that are disturbed as part of redevelopment activities will be observed for visual and olfactory evidence of impacts in accordance with this Plan. Based on conversations with QuikTrip, areas of potential redevelopment disturbance include general site grading, and excavations for foundation footings, UST basin installation, piping for subsurface utilities, and the stormwater retention basin. Based on the findings of the assessments completed to date, special soil handling and management procedures are not anticipated to be required for the redevelopment activities.

7.2 Site Preparation

This Plan assumes that residual existing structures, if identified, will be removed from the subject property in accordance with local, state, and federal regulations prior to the implementation of this Plan.

Excavation areas will be monitored for visible dust and petroleum vapors and will be sprayed with water if dust is visible, or an approved solution will be implemented if petroleum vapors are noticeable during excavation, or during handling of impacted materials, if encountered.

Excavated soil that is suspected of being impacted shall be either stockpiled on-site or placed directly into the disposal vessels (i.e., into trucks or roll-off containers) in accordance with applicable federal, state, and local rules and regulations. Although not anticipated, temporary stockpiling of impacted material will be on plastic sheeting. Designated temporary stockpile areas shall be secured to restrict access. The stockpile shall be covered with plastic sheeting prior to inclement weather and at the end of each workday throughout the construction period to control and eliminate water from contacting the stockpiled materials to prevent erosion/transport of the soil by surface water runoff, and to limit dust generation.

7.3 Waste Characterization - Soil

Should impacted soil be identified by observation of staining, petroleum odors, and/or elevated PID readings, the contractors or sub-contractors must report those conditions immediately to the Project Superintendent or, in his absence, to the Site Environmental Representative. The Site Environmental Representative will coordinate the excavation of the impacted material and collect confirmatory soil samples documenting the subsurface conditions prior to the excavation activities in these areas.

The confirmatory soil samples will be delivered to an Alabama certified laboratory and analyzed for VOCs using EPA Method 8260B and PAHs using EPA Method 8270C. For impacted soils that will be sent off-site, the soil samples will be delivered to an Alabama certified laboratory and analyzed for any other analyses requested by the licensed disposal facility and approved by the Site Environmental Representative.

Each sample collected for analytical testing will be labeled with sample identification, dated, and placed in a laboratory prepared container and an iced cooler. Personnel handling the samples will wear a new pair of disposable gloves for each sample throughout soil sample collection. This is necessary in order to prevent cross contamination. Samples will be transported and delivered following proper chain-of-custody procedures. The chain-of-custody will include the name of accepting laboratory, personnel, time

of sample arrival, sample temperature if applicable, date, and will be signed by personnel of the laboratory.

7.4 On-Site Use of Impacted Soil

Based on the sampling completed to date and our understanding of the proposed redevelopment activities, redevelopment of the subject property will include the following:

- Estimated 11,200 cubic yards of clearing and grubbing which may be disposed of off-site.
- Estimated 35,600 cubic yards of fill material will be imported from off-site sources.
- Estimated 11,000 cubic yards of soil will be excavated and may transported off-site for disposal.
- Estimated 1,050 cubic yards of soil will be excavated and placed on-site.

While it is not currently anticipated, if reused on-site, impacted soil will be capped in accordance with *Section 10.0*, thus eliminating direct contact exposure.

7.5 Transportation Plan

Should impacted soils be discovered during earthwork, the soils will be either directly loaded for disposal or temporarily stockpiled on-site as described in *Section 7.2*, prior to acceptance at the appropriate disposal facility.

The remediation and/or site contractor will provide transportation for the impacted soil, if discovered. Each dump truck/roll-off container to be used will be equipped with covers. If impacted soil is to be removed from the subject property and disposed of, truck drivers will carry a signed appropriate waste manifest while in route to the disposal facility.

7.6 Permit and Notices

An excavation or grading permit, from the City of Ashville or St. Clair County, may be required, and should be obtained prior to beginning the excavation/grading operations. Municipal permitting guidelines will be adhered to, and hence, notices and construction permits will be posted at visible areas of the subject property.

7.7 Implementation Report

At the completion of field activities, a Corrective Measures Report will be submitted to ADEM and QuikTrip within approximately 30 days.

7.8 Schedule

The implementation of the approved Plan will begin after receiving approval from ADEM and other authorization necessary to legally proceed with field activities, as well as subsequent to the demolition of on-site structures, if identified.

Required permits to begin earth disturbance will be obtained by the demolition/grading contractor. While processing the necessary permits for site preparatory activities, mobilization of equipment may commence.

8.0 PROVISIONS FOR HANDLING POTENTIALLY REGULATED WATER

It is anticipated, based on our assessments to date, that groundwater will be encountered during excavation for installation of the UST basins. Based on the previous sampling discussed in Section 2.0, groundwater in the areas of the tank basins would not currently be considered impacted. At this time, the Contractor plans to, as necessary, pump groundwater encountered in the work areas into the proposed retention pond where it will be allowed to infiltrate through the subsurface.

Construction activities will progress attempting to minimize or eliminate accumulation of stormwater at the subject property. In the event that stormwater management is required, the applicable excavation activities should terminate, and the following procedures will be followed to address stormwater. Based on our assessments to date, it is not anticipated that stormwater on the subject property will be considered impacted. At this time, the Contractor plans to, as necessary, allow stormwater to infiltrate the subsurface, and, as necessary, pump pooled stormwater encountered in the work areas into the proposed retention pond where it will be allowed to infiltrate through the subsurface.

Non-impacted groundwater or stormwater may also be pumped, containerized, and transported to offsite to an appropriate receiving facility or discharged to the municipal sewer system after approval is obtained from the local sewer authority.

If potentially impacted groundwater is encountered in an excavation (exhibiting a sheen, odor, or in contact with impacted soil), the Contractor must stop work and notify the Owner and the Site Environmental Representative immediately. Please see contacts listed on the Project Contact List in Section 5.1. The Site Environmental Representative will assess the subject property, and the water conditions visually and potentially collect water samples for laboratory analysis. The Site Environmental Representative will work with ADEM to determine appropriate handling and disposal methods for impacted groundwater, if encountered during work activities, and may amend this VCP, if needed.

Groundwater from the subject property will not be utilized for drinking water or irrigation purposes onsite. We understand that an Environmental Covenant will be recorded at a later date.

9.0 PROVISIONS FOR MITIGATING POTENTIAL SOIL VAPOR INTRUSION

A Vapor Mitigation Plan will be submitted under a separate cover.

10.0 DECONTAMINATION PROCEDURES

The following decontamination procedures should be followed:

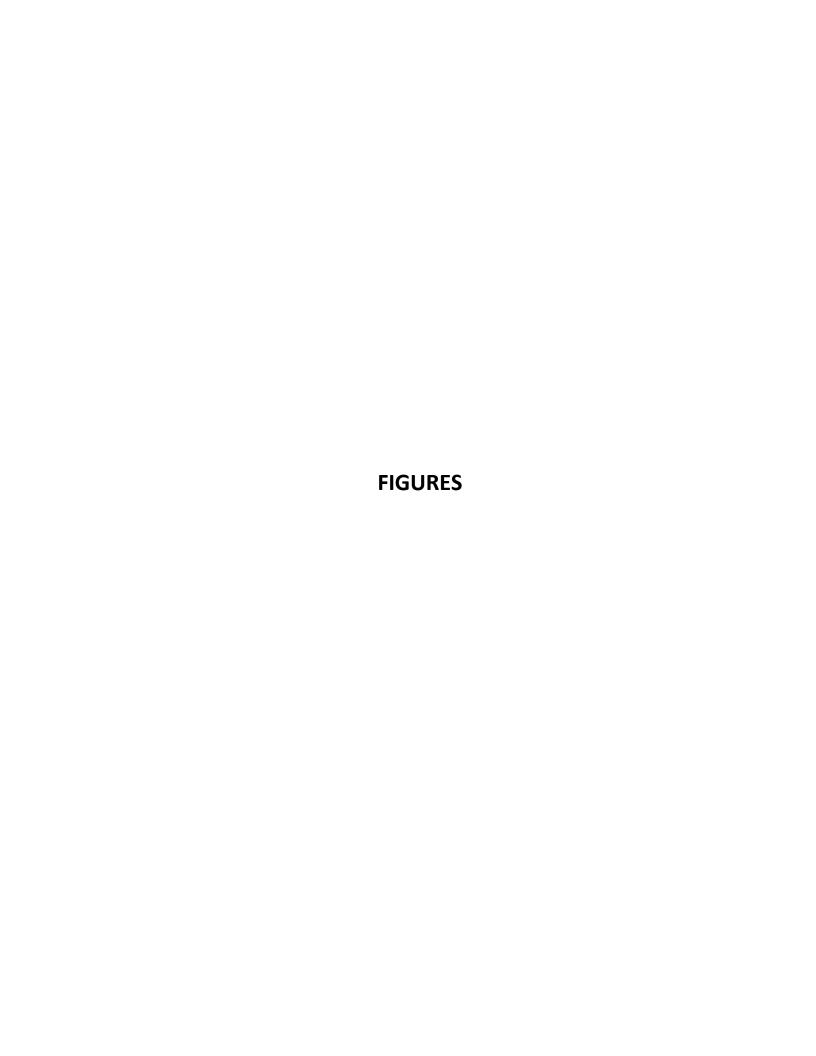
- Equipment working within areas of suspected impacts will be required to be evaluated for decontamination prior to demobilizing from the subject property.
- Evaluation as to whether personnel or vehicle decontamination will be required will be made by the Site Environmental Representative on a case-by-case basis considering the nature and concentration of the impacts encountered.
- Dry decontamination procedures for vehicles are likely to include, but may not be limited to, brushing or scraping of tires, treads, undercarriages, and buckets of vehicles and equipment that may have come in contact with impacted materials. Such dry decontamination will occur in designated areas constructed to contain and collect the recovered solids and liquids.
- Wet decontamination procedures for vehicles are likely to include, but may not be limited
 to, pressure washing tires, treads, undercarriages and buckets of vehicles and equipment
 that may have come in contact with impacted materials. Wet decontamination will occur in
 designated areas constructed to contain and collect the recovered solids and liquids and
 must be pre-approved.
- Personnel decontamination procedures will comply with those specified in each contractor's/sub-contractor's Site-Specific HASP for their respective workers.

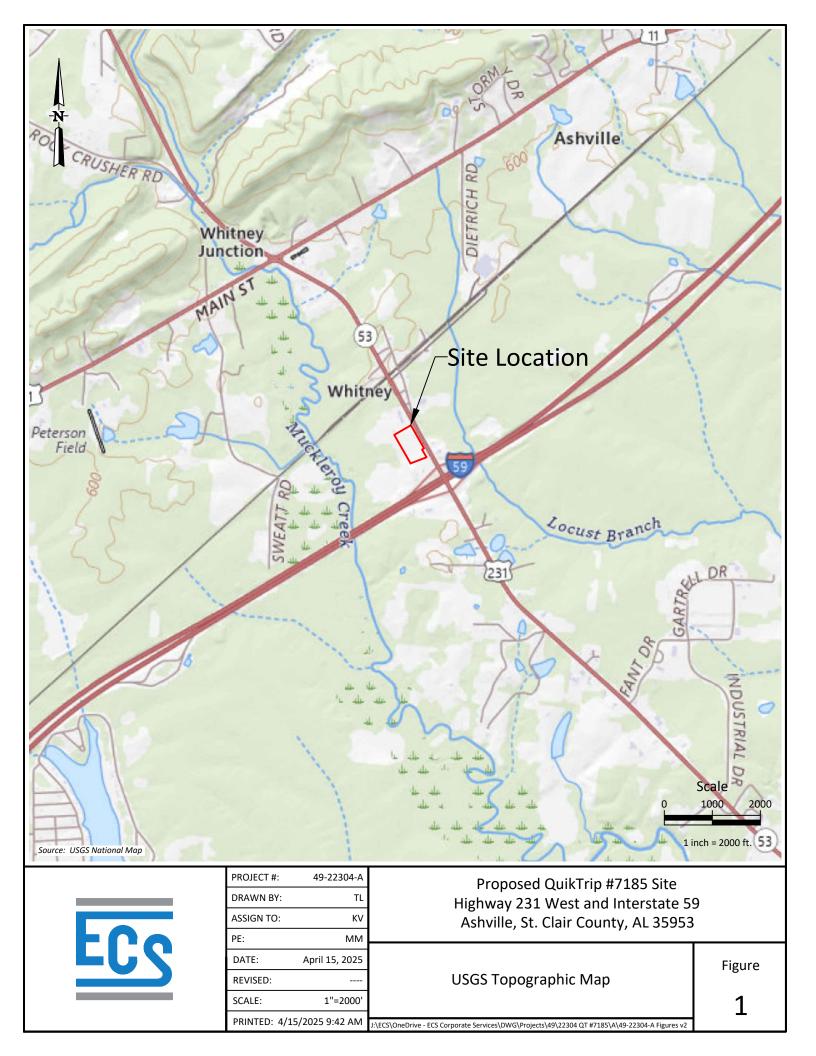
11.0 POST CORRECTIVE ACTION EXPOSURE CONTROL

As an additional measure of protection and per the ADEM Land Use Controls (Land Use Restrictions) the following exposure barriers may also be implemented across the property:

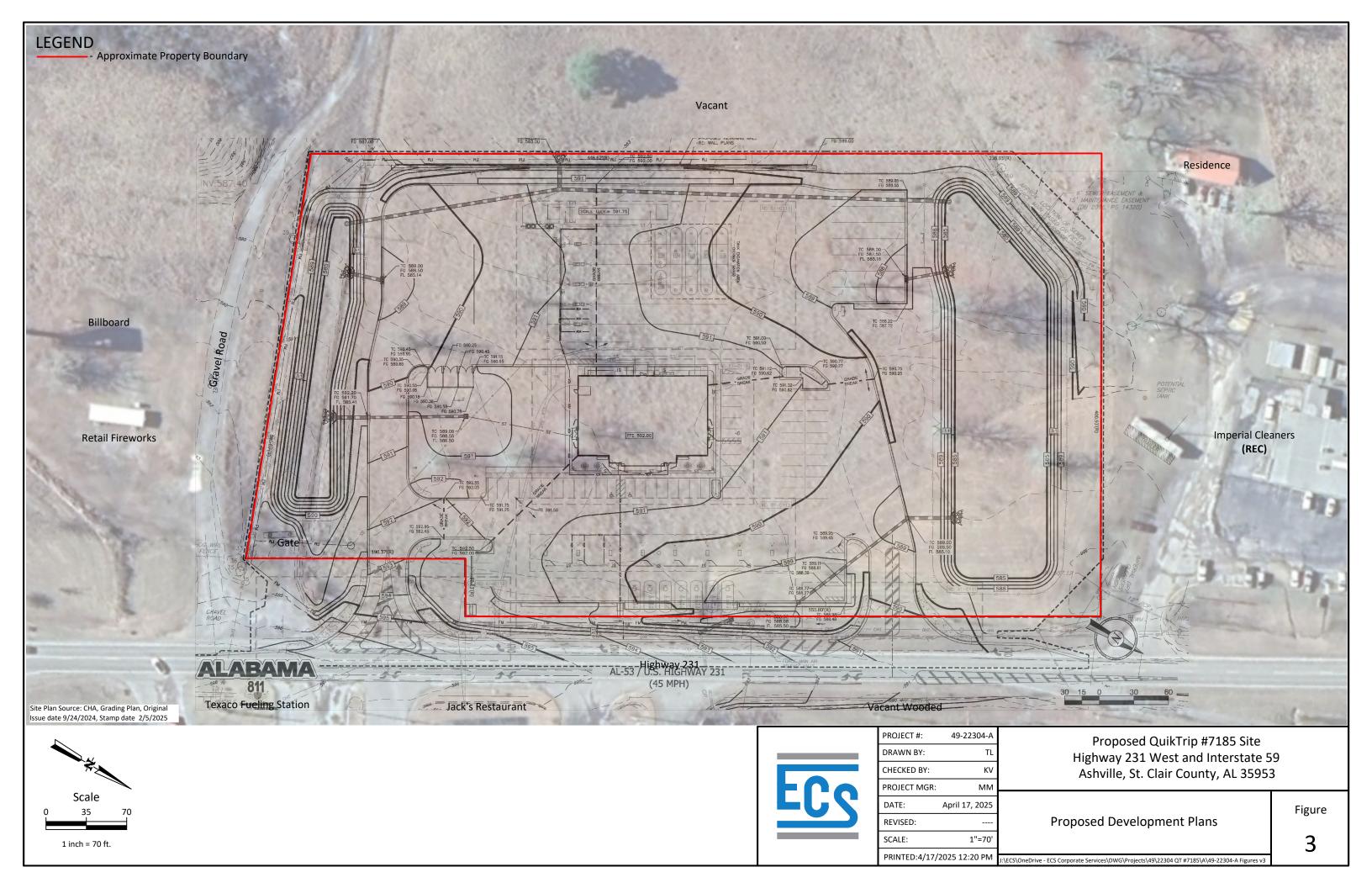
- Building, pavement, and/or parking areas may serve as impervious exposure barriers to limit future contact with impacted soil.
- At least two feet of clean fill will be placed in uncovered areas (no planned buildings or pavement) if impacted soils are identified.
- Although not anticipated, based on the proposed development plans indicating impervious surface across the areas of the subject property where impacted material has been identified, if uncovered areas with less than two feet of fill material are proposed, an exposure barrier consisting of a buried demarcation barrier (aka witness barrier) cover shall be used. The demarcation barrier should be placed within the excavations prior to backfill with clean fill material.

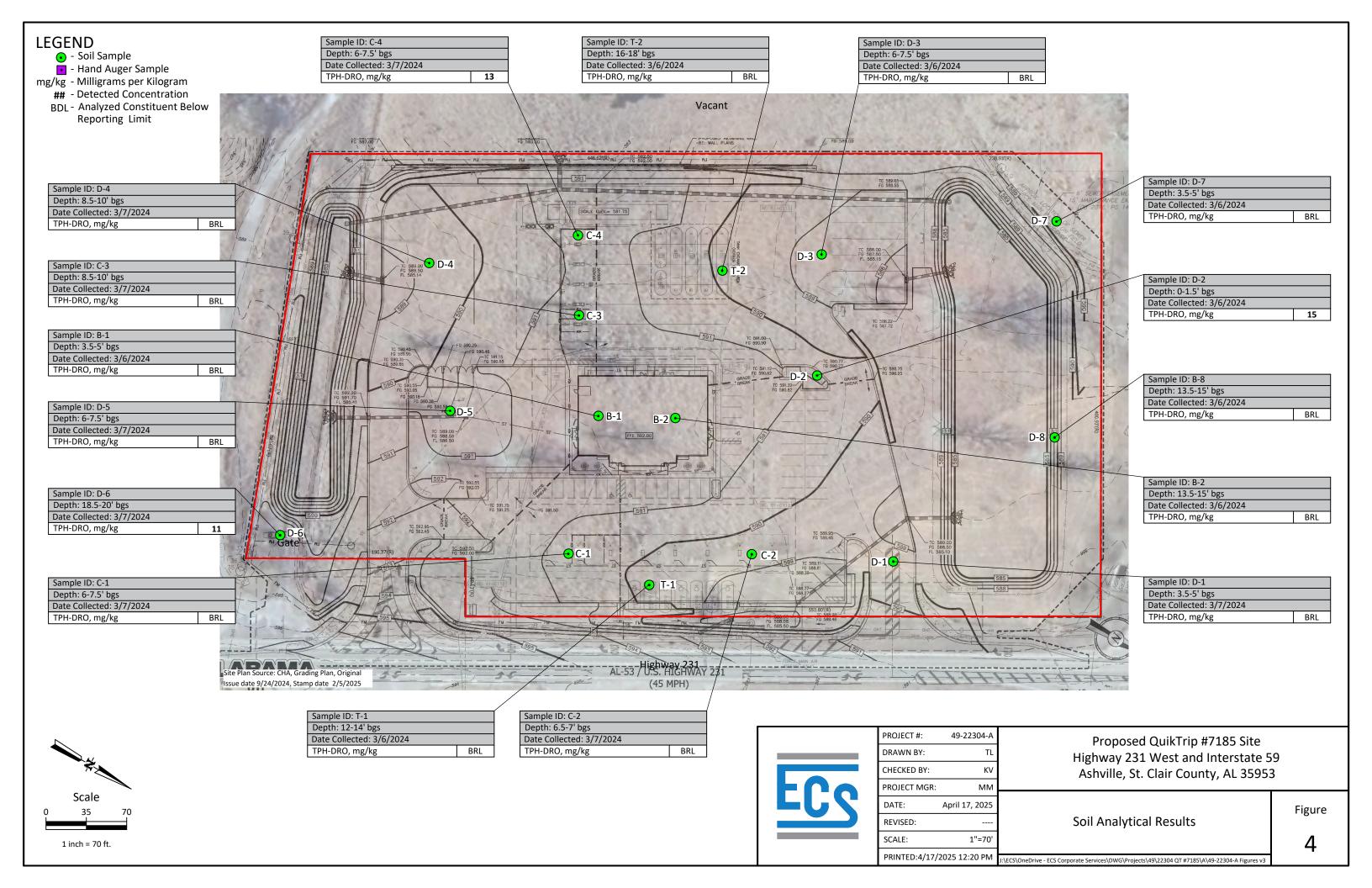
Property Managers should be trained in the assessments completed on-site and the information included in this Plan. Awareness regarding unpermitted import/export of soil, or unpermitted soil disturbance and other excavations should be performed.

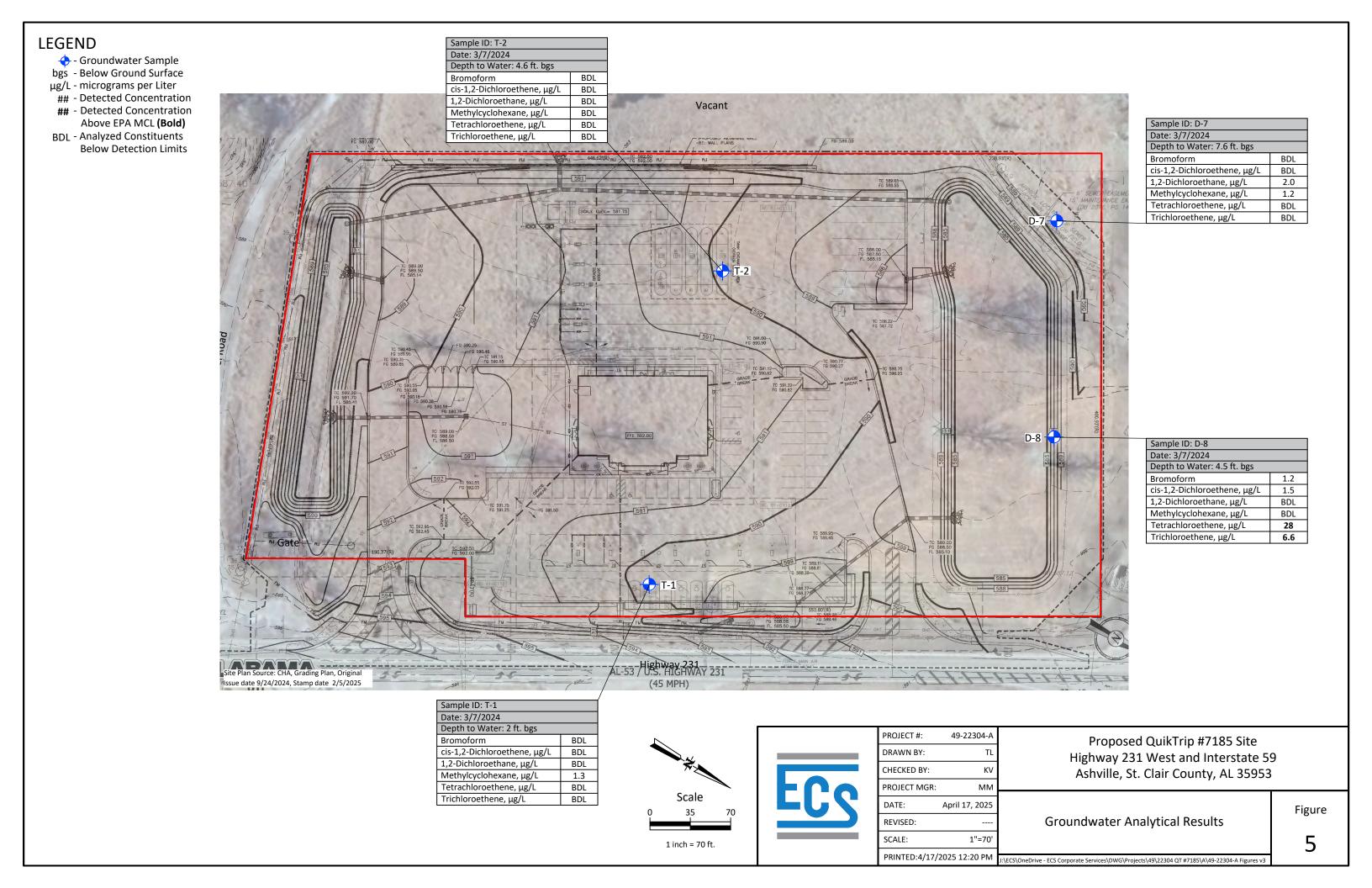












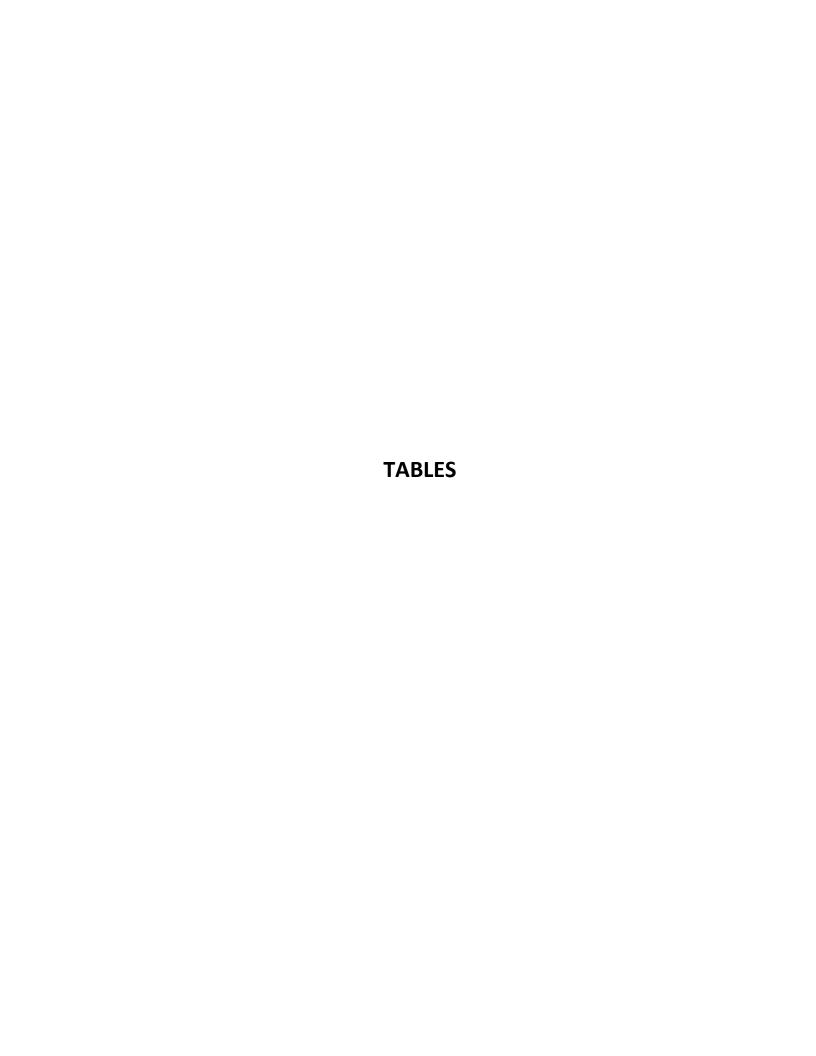


Table 1 Summary of Soil Analytical Data - March 2024

QuikTrip #7185 Site Highway 231 West and Interstate 59 Ashville, St. Clair County, Alabama ECS Project No. 49-22304-A

				VOCs by EPA Method 8260	TPH-DRO by EPA Method 8015	
Sample ID	Sample Type	Sample Depth (ft bgs)	Sample Date	Target Compounds	TPH-DRO	
	Varies	NE				
	Industrial RSL					
	MCL-Based SSL					
B-1	Soil	3.5-5	03/06/24	BRL	<9.5	
B-2	Soil	13.5-15	03/06/24	BRL	<8.9	
C-1	Soil	6-7.5	03/07/24	BRL	<8.8	
C-2	Soil	6-7.5	03/07/24	BRL	<9.9	
C-3	Soil	8.5-10	03/06/24	BRL	<8.9	
C-4	Soil	6-7.5	03/07/24	BRL	13	
D-1	Soil	3.5-5	03/07/24	BRL	<11	
D-2	Soil	0-1.5	03/06/24	BRL	15	
D-3	Soil	6-7.5	03/06/24	BRL	<8.8	
D-4	Soil	8.5-10	03/07/24	BRL	<8.9	
D-5	Soil	6-7.5	03/07/24	BRL	<10	
D-6	Soil	18.5-20	03/07/24	BRL	11	
D-7	Soil	3.5-5	03/06/24	BRL	<10	
D-8	Soil	13.5-15	03/06/24	BRL	<9.1	
T-1	Soil	12-14	03/06/24	BRL	<8.9	
T-2	Soil	16-18	03/06/24	BRL	<8.5	

Notes:

Results presented in milligrams per Kilogram (mg/Kg)

Compounds not shown were not detected above laboratory reporting limits

ft bgs = feet below ground surface

VOCs = Volatile Organic Compounds

TPH-DRO = Total Petroleum Hydrocarbons in the Diesel Range Organics

Target Compounds included benzene, toluene, ethylene, xylenes, and methyl tert-butyl ether

RSL = Regional Screening Level

MCL = Maximum Contaminant Level

SSL = Soil Screening Level

NE = No Established Standard

BRL = Below Reporting Limit

< 0.00 = Less than the laboratory detection limit

Table 2 Summary of Groundwater Analytical Data - March 2024

QuikTrip #7185 Site
Highway 231 West and Interstate 59
Ashville, St. Clair County, Alabama
ECS Project No. 49-22304-A

	Sample ID Sample Type Sample D	VOCs by EPA				OCs by EPA	Method 8260		
Sample ID		oe Sample Date	Bromoform	cis-1,2-Dichloroethene	1,2-Dichloroethane	Methylcyclohexane	Tetrachloroethene	Trichloroethene	
EPA MCL			80	70	5.0	NE	5.0	5.0	
D-7	Water	03/06/24	<1.0	<1.0	2.0	1.2	<1.0	<1.0	
D-8	Water	03/06/24	1.2	1.5	<1.0	<1.0	28	6.6	
T-1	Water	03/06/24	<1.0	<1.0	<1.0	1.3	<1.0	<1.0	
T-2	Water	03/06/24	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	

Notes:

Results presented in micrograms per Liter (µg/L)

Compounds not shown were not detected

VOCs = Volatile Organic Compounds

EPA MCL = Environmental Protection Agency Maximum Contaminant Level

 $Concentrations \ are \ compared \ to \ the \ EPA \ Regional \ Screening \ Level \ (RSL) \ Summary \ Table \ (TR=1E-06, \ HQ=0.1), \ November \ 2024$

<0.00 = Less than the laboratory reporting limit

VALUE	= concentration greater than the laboratory reporting limit
VALUE	= concentration greater than the EPA MCL