

4401 Coalburg Road
Birmingham, Alabama
ADEM VCP Site- 461-073-25048

Fact Sheet

A Voluntary Cleanup Program (VCP) Cleanup Plan has been found to be technically adequate by the Alabama Department of Environmental Management (ADEM) for the 4401 Coalburg Road site. The applicant is SunCap Property Group LLC. This fact sheet has been prepared to briefly advise the public of the principal legal and policy issues of the Voluntary Cleanup Plan.

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

The ADEM is proposing to issue SunCap Property Group LLC., a final decision for the site remediation.

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 April 8th, 2026, which is the date of publication of the public notice in major local newspaper(s) of general circulation and will end on May 8th, 2026.

All persons wishing to comment on any of the conditions of the VCP Remediation should submit their comments in writing to the Alabama Department of Environmental Management, 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 the Alabama Department of Environmental Management and be received by 5:00 p.m. on May 8th , 2026.

ADEM will consider all written comments received during the comment period while making a final decision on this issue. When the Department 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

SunCap Property Group, LLC. has completed Site Investigation activities under the VCP program at the 4401. Coalburg Road site located at 4401 Coalburg Road, Birmingham, Jefferson County, Alabama 35207. The site consists of 32.3 acres. Coordinates for the site are 33°34'01"N and 86°50'30"W

The contaminants found on the site are the following examples: COPCs in soil include 1 methylnaphthalene, Arsenic and Thallium. Contaminants in groundwater include antimony, arsenic, barium, beryllium, cadmium, total chromium, copper, lead, mercury, selenium and thallium The property has an extensive history of mining-related operations, with documented activities beginning as early as 1907 and continuing through the 1960s. During this period, the site functioned primarily as a staging and stockpiling area for coal mine tailings generated by the former Sayreton Mine. Following the cessation of mining activities in the late 1960s, the property has remained inactive and undeveloped, and no additional mine spoils or related materials have been generated or deposited on-site. As of 2026, a single remaining stockpile of legacy tailings is present within the southwestern portion of the Site.

IV. Technical Contact

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VOLUNTARY CLEANUP WORK PLAN

**4401 Coalburg Road
Birmingham, Alabama 35207
ADEM VCP Site ID: 461-073-25046**

Prepared For:

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Charlotte, North Carolina 28209**

Prepared By:

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**14 January 2026
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1.0 INTRODUCTION

On behalf of SunCap Development Group (SunCap), Langan Engineering and Environmental Services, LLC (Langan) has prepared this Voluntary Cleanup Work Plan for the approximately 32.3-acre property located at 4401 Coalburg Road, Birmingham, Jefferson County, Alabama (the Site). A United States Geological Survey (USGS) Site Location Map is included as Figure 1.

SunCap submitted a Voluntary Cleanup Program (VCP) application to the Alabama Department of Environmental Management (ADEM) on 18 September 2025 to enroll the Site in the VCP. The Site was approved by ADEM on 22 October 2025 and provided Facility ID No. 461-073-25046. The application approval is provided as Appendix A. As outlined in the VCP Application, SunCap is identified as a non-responsible party and did not cause or contribute to any chemicals of potential concern (COPCs) detected during the recent site investigations. SunCap has taken all necessary steps to enroll the property in the Alabama VCP and to obtain regulatory concurrence on the site characterization required to address these COPCs. The facility, also referred to by its alias "4401 Coalburg Road", does not currently possess an EPA Facility ID.

A Voluntary Cleanup Plan Assessment Report (VCPAR) was submitted to ADEM on 14 January 2026 and is pending ADEM approval. The VCPAR documents the completed site characterization activities in accordance with applicable regulatory guidance documents. A summary of the prior investigations is provided in Sections 3.0 and 4.0 below. In short, the COPCs identified at the Site during site characterization activities include one polycyclic aromatic hydrocarbon (PAH), 1-methylnaphthalene, and two metals, arsenic and thallium, in soil only. The proposed cleanup plan to address the COPCs is presented in Section 5.0.

2.0 SITE DESCRIPTION

The Site consists of approximately 32.3 acres and is located at 4401 Coalburg Road in Birmingham, Jefferson County, Alabama. The Site is also identified as Jefferson County parcel number 22 00 10 3 000 001.001. The Site layout is shown on Figure 2 along with the samples which were collected for the VCPAR. The Site is owned by SAIIA Coalburg LLC.

The property has an extensive history of mining-related operations, with documented activities beginning as early as 1907 and continuing through the 1960s. During this period, the Site functioned primarily as a staging and stockpiling area for coal mine tailings generated by the former Sayreton Mine. Following the cessation of mining activities in the late 1960s, the property has remained inactive and undeveloped, and no additional mine spoils or related materials have been generated or deposited on-site. As of 2025, a single remaining stockpile of legacy tailings is present within the southwestern portion of the Site.

Ownership records show the following timeline:

- 2003–2004: Joint ownership by SAIIA Construction LLC, Best Coal Inc., and K & H Development Co.
- 2005–2007: Ownership transitioned to SAIIA Construction LLC and K & H Development Co.
- 2008–2011: SAIIA Construction LLC became the sole owner.
- 2012–Present: The property has been owned by SAIIA Coalburg LLC.

According to the Jefferson County Tax Assessor, the Site is classified as “910 – Undeveloped” and unused land. The property is zoned for industrial use and is surrounded by a mix of forested land and industrial buildings.

SunCap proposes to redevelop the Site with a warehouse (i.e., non-residential use). This concept is preliminary and subject to change, but residential site use is not being considered.

3.0 SUMMARY OF PREVIOUS INVESTIGATIONS

Langan was provided with the following prior reports associated with the Site:

- Phase I ESA, prepared by Spectrum Environmental Services, Inc., July 2002;
- Report of Geotechnical Exploration, prepared by Goodwyn, Mills, and Cawood, Inc (GM&C), 9 April 2008; and,
- Report of Preliminary Geotechnical Evaluation, prepared by Contour Engineering, 29 January 2019.

Langan also identified various correspondence and the following prior reports from the ADEM eFile database pertaining to the Site's involvement in the Voluntary Cleanup Plan (VCP) and a Limited Phase II Assessment:

- Phase II Letter Report prepared by Terracon Consultants, Inc., June 1998;
- Phase II ESA prepared by Davidson Howard, LLC, April 2004;
- VCP Application to Participate, prepared by Daniel Payne Drive LLC & Saiia Construction LLC, 8 June 2009;
- VCP Application Assessment Plan, prepared by GM&C, 3 August 2009; and,
- Limited Phase II Investigation VCP Assessment, prepared by GM&C, March 2011.

Additional documents included site plans, permits, and surveys. Copies of the aforementioned reports and documents were provided in the VCPAR.

Voluntary Cleanup Program

An application to participate in the ADEM VCP was submitted for an approximately 125-acre property under the name Daniel Payne Drive & Coalburg Road property, which includes the Site and additional properties to the east of the Site.

An Assessment Plan was prepared to support the application to participate in the ADEM VCP and included the July 2002 Phase I ESA, April 2004 Phase II ESA, and June 1998 Phase II Letter Report. The April 2004 Phase II ESA and June 1998 Phase II Letter Report were associated with the southeast portion of the larger 125-acre property, located approximately 3,000 feet southeast of the Site.

Based on these reports, 16 surficial soil samples, 24 passive soil vapor samples, one surface water sample, and one groundwater sample were proposed in the assessment plan. Of the proposed sampling locations, two superficial soil samples with expanding testing and two passive soil vapor samples were proposed in the southeast and central portions of the Site. Additionally, GM&C identified the central portion of the Site as an area of concern due metals in soil media originating from mine spoils.

A limited Phase II Investigation was performed in 2011 of an approximately 25-acre area, which included the Site and was located in the northwestern portion of the previously indicated 125-acre property. GM&C collected surface water and sediment samples at the northeastern pond

adjoining the Site and composite surficial soil samples at six locations across the 25-acre area, five of which were within the Site. Samples were analyzed for metals including Resource Conservation and Recovery Act (RCRA) 8 metals, aluminum, manganese, and iron and were compared to the ADEM Risk Based Corrective Action (ARBCA) screening levels.

Arsenic was detected at concentrations ranging from 26 to 269 parts per million (ppm) in soil at the Site. Five additional samples were collected on the western portion of the Site "in an area thought to be never-used for spoil storage" for analysis of arsenic. Arsenic concentrations were below method detection limits. Detected metal concentrations in surface water samples from the eastern adjoining pond were below ARBCA screening levels, except for manganese which was detected at 2.1 milligrams per liter (mg/L) which exceeded the 0.088 mg/L ARBCA Tap Water screening level. Due to lack of established ARBCA screening levels for sediment, sediment samples were compared to United States Environmental Protection Agency (USEPA) Region 5 Ecological Screening Values. Detected concentrations of arsenic, chromium, and lead exceeded USEPA Ecological Screening Values.

Due to metals exceedances in soil and sediment at the Site, GM&C recommended capping the 25-acre area using compacted clay topped with gravel, paving, and the proposed building to mitigate the risk of direct contact exposure.

The Limited Phase II Investigation was approved by ADEM in June 2011. The approval letter indicated that a cleanup plan should be prepared to address the identified contamination and should be submitted to ADEM for approval. However, according to a site status letter in August 2016, no cleanup plan was submitted, and the Daniel Payne Drive & Coalburg Road Property was deactivated as a Brownfields Site in June 2016. The previous Site owners indicated the Site was deactivated as there were no future plans for assessment or development anticipated.

Geotechnical Explorations

The Site is situated within the Pottsville Geologic Formation, which consists of sandstone, shale, and siltstone with interbedded coal seams. The following subsurface observations were made during geotechnical explorations conducted in 2008 and 2019:

- Twenty-eight soil borings were advanced at the Site at depths up to 60 feet below ground surface (bgs) and eight test pits were excavated to depths up to 17 feet bgs.
- Fill was observed to depths up to 57 feet bgs and included underground mine spoils consisting of clayey and silty sands with gravel fragments (coal, shale, and sandstone), as well as residual soils consisting of sandy clays, sandy silts, and clayey sands.
- Groundwater was not encountered in soil borings or test pits advanced for the previous geotechnical explorations. Isolated zones of moisture were identified in two borings at depths of approximately 9 and 25 feet bgs.

Previous Investigation Summary

Previous investigations conducted at the Site have identified fill, including underground mine spoils and foundry sand/slag debris, to depths up to 57 feet bgs. Arsenic was identified in surficial soil at the Site at concentrations above ARBCA screening levels.

Previous subsurface investigations identified isolated zones of moisture at various depths in only two borings. The remaining borings, which were advanced to approximately 60 feet bgs, did not encounter groundwater. In addition, no laterally continuous zone of saturation was observed, as would typically be expected if a water table or aquifer were present within the fill materials. Based on these findings, groundwater has not been encountered at the Site.

4.0 SITE ASSESSMENT ACTIVITIES

Langan completed a site assessment at the Site in October and November 2025. The scope of work completed during site assessment activities included the following:

- Collection of 22 soil samples from 10 borings (up to four depth intervals at each location) for analysis of Target Analyte List (TAL) metals and PAHs to determine if former coal mining operations have impacted soil at the Site;
- Collection of 4 water samples for analysis of total TAL metals and PAHs to determine if former coal mining operations impacted groundwater at the Site; and,
- Field screening of soil vapor monitoring points to assess the potential presence of methane.

Langan conducted sampling of the soil borings, groundwater monitoring wells, and soil vapor points in accordance with Alabama Environmental Investigation and Remediation Guidance (AEIRG) requirements as applicable. The soil borings, groundwater monitoring wells, and soil vapor points were installed by an Alabama-licensed driller. Additional site assessment activities and results discussion, including COPCs, are discussed in Sections 4.1 through 4.3 below and included in the VCPAR.

4.1 Soil Investigation and Results

Soil Investigation

On 10 October 2025, Langan collected 22 soil samples from 10 soil borings. The soil borings were advanced to refusal or 40 feet bgs, whichever was encountered first. Shallow refusal was encountered between 9 and 33 feet bgs at SB-04, SB-05, SB-07, SB-08, SB-11 and SB-12. Drilling efforts at SB-11 and SB-12 were abandoned after multiple shallow refusals were encountered. At each soil boring location, Langan recorded odors and visual evidence of staining, and screened the soil samples for hydrocarbon vapors using an organic vapor analyzer (OVA) equipped with a Photoionization Detector (PID).

As the COPCs associated with mining operations do not readily lend themselves to visual, olfactory, or PID detection, the samples designated to be collected from the areas of greatest observed impacts were generally collected directly below the end of mine spoil material when this material ended. Samples were not collected from material that was mostly composed of visibly identifiable mining spoils. In borings where spoils represented the majority of material encountered, samples were collected from the six-inch interval directly above the spoils. If native material was encountered below spoil layers, a sample was collected from the six-inch interval directly below native/spoil interface.

The soil samples were analyzed for TAL metals via USEPA Method 6020 and PAHs via USEPA Method 8270 by Eurofins Environmental Testing, LLC (Eurofins).

Soil Results

A summary of the soil investigation findings is presented below:

- Mine spoils were observed from ground surface to approximately 40 feet bgs on the central and eastern portions of the Site. Sporadic areas of spoils were encountered on the western portion of the Site.
- No field indications of environmental impacts (i.e. staining, odors, and/or elevated PID readings) were observed.

Based on the historical and planned future use of the Site, the soil results were screened against the USEPA Regional Screening Levels (RSLs) for Industrial Soil utilizing the specified target hazard quotient (THQ) and target cancer risk (TR). Concentrations of PAHs and/or metals did not exceed the RSLs, except for 1-methylnaphthalene, arsenic, and thallium. 1-methylnaphthalene exceeded the Industrial Soil RSL of 0.077 milligrams per kilogram (mg/kg) in five soil samples with a maximum detected concentration of 0.76 mg/kg. Arsenic exceeded the Industrial Soil RSL of 3 mg/kg in 20 soil samples with a maximum detection of 230 mg/kg. Thallium exceeded the Industrial Soil RSL of 1.2 mg/kg in three soil samples with a maximum detection of 2.9 mg/kg.

Based on these exceedances, 1-methylnaphthalene, arsenic, and thallium were identified as COPCs in soil. As part of the VCPAR, these COPCs were included in a Human Health Risk Assessment (HHRA) which was completed in accordance with ADEM's Risk Management (RM) – 1 guidelines. Refer to Section 4.4 for more information.

4.2 Groundwater Investigation and Results

Groundwater Investigation

Following the completion of soil sampling activities, Langan supervised the conversion of SB-1 and SB-3 into temporary monitoring wells TMW-1 and TMW-3 because isolated zones of moisture were encountered in those borings. No moisture was encountered in SB-2 before the target depth, so the boring was advanced to 50 feet bgs in an attempt to find groundwater in a deeper interval. Although isolated zones of moisture were not identified down to 50 feet bgs, a temporary well (TMW-2) was conservatively installed.

During field activities, Langan also identified two previously installed temporary wells (GMW-2 and GMW-4) from an earlier site investigation. Both wells were in suitable condition for reuse and were incorporated into this initial groundwater assessment.

The temporary wells were installed for the purpose of evaluating potential groundwater impacts associated with historical mine-spoil stockpiling. As documented on the boring logs included in the VCPAR, saturated soils or cuttings indicative of a groundwater zone were not encountered. Instead, only isolated, discontinuous moisture zones were observed, which are not characteristic of a water-bearing unit.

The existing wells, GMW-2 and GMW-4, were gauged, and their total depths indicated that they were screened across intervals comparable to those of TMW-1 and TMW-3. Because TMW-2 and TMW-4 did not accumulate sufficient water for sampling, Langan proceeded to develop the existing wells and obtain groundwater samples from each. As summarized in the table below, only limited water volumes were present in the temporary monitoring wells; however, the yields were adequate to allow for sample collection.

Well ID	Total Depth (ft bgs)	Screened Interval (feet bgs)	Depth to Water (ft bgs)
TMW-1	37	27-37	34.05
TMW-2	50	40-50	DRY
TMW-3	33	23-33	29.1
GMW-2	34	24-34	32
GMW-4	33	23-33	31.4

Based on the limited volume of water and sufficiently low recharge rates, the temporary monitoring wells were sampled using “evacuate and recover” sampling techniques. In this approach, the wells were pumped dry and samples were obtained from the water that subsequently recharged into the well. Although this technique enabled sample collection from the low-yield wells, the resulting turbidity levels were elevated and may have influenced the analytical results. In accordance with ARBCA guidance, the groundwater samples were collected without filtration.

Water samples were placed in laboratory-supplied containers, immediately stored in a cooler with ice, and transported to Eurofins under chain-of-custody procedures. The water samples were analyzed for TAL metals via USEPA Method 6020 and PAHs via USEPA Method 8270 by Eurofins.

Groundwater Results

Utilizing the specified THQ and TH values, groundwater samples were conservatively screened against the Tapwater RSLs and the USEPA Maximum Contaminant Levels (MCLs). PAHs did not exceed either the Tapwater RSLs or MCLs. Eighteen metals exceeded their respective Tapwater RSLs; however, only eleven of those metals exceeded their corresponding MCLs.

Screening the analytical results against Tapwater RSLs and MCLs represents a conservative assessment, as groundwater is not utilized as a potable water supply at the Site or in the surrounding vicinity. Further, due to the limited recharge in each well, well development and purging activities were limited, resulting in elevated turbidity in all collected samples. In accordance with ADEM guidance, groundwater samples were not filtered; therefore, the results reflect total (unfiltered) concentrations and may overestimate true dissolved-phase groundwater conditions.

Additionally, isolated moisture zones were encountered in some soil borings during this and previous investigations; however, the majority of borings did not identify groundwater to depths of approximately 60 feet bgs. A laterally continuous water table (characteristic of a water-bearing unit within fill material) was not observed at the Site.

4.3 Soil Vapor Investigation and Results

Soil Vapor Investigation

Langan installed three paired exterior soil vapor monitoring points (VP-1, VP-2, and VP-3) at locations across the Site on 2 November 2025 to evaluate the presence of methane in shallow soil gas. Points with an “A” suffix were installed to a depth of approximately 5 feet bgs, while

points with a "B" suffix were installed to a depth of 10 feet bgs. Paired monitoring points consisted of one point installed to 5 feet bgs and one installed to 10 feet bgs. The soil vapor monitoring points consisted of AMS, Inc. (AMS) dedicated gas vapor probe tips connected to an appropriate length of ¼-inch inner diameter low-density polyethylene (LDPE) tubing. Sand was used to backfill each monitoring location to within 1 foot of the ground surface. Each point was finished with one foot of hydrated bentonite to complete a seal.

Each soil vapor monitoring point was left in place to equilibrate for at least 48 hours after installation. Prior to the collection of field parameters, shut-in tests were performed as a quality control measure to ensure no ambient air was drawn into the sampling equipment.

The shut-in test was performed after all tubing connections had been made to the sample canister. Langan field staff connected a vacuum gauge to the sample tubing apparatus and used a handheld vacuum pump to pull a vacuum of between 7.5 and 15 inches of pressure. While holding the vacuum, the field staff monitored the pressure for a period of one minute to confirm the amount of vacuum did not decrease more than 10% from the starting point. If the vacuum decreased more than 10%, the test was repeated after inspecting and testing (using the vacuum hand pump) each valve and coupling on the sampling train. Langan field staff checked each valve and coupling to confirm they were secure and tightened them as necessary.

Prior to screening, each exterior soil vapor extraction point was purged using an SKC Universal Low Flow Sampling pump at a rate of 200 milliliters per minute (mL/min) to evacuate a minimum of three sample tubing volumes prior to field screening. After purging was complete, a calibrated Landtec GEM-5000 gas meter was used to conduct soil vapor screening, recording oxygen, carbon dioxide, carbon monoxide, hydrogen sulfide, and methane, recording once at 0 seconds, 30 seconds, 1 minute and every minute until ten minutes. Methane was not detected in the soil vapor monitoring points.

Soil Vapor Results

Although the identified COPCs are not considered a source of soil vapor contamination, vapor monitoring points were installed to assess the potential presence of methane. Six soil vapor points (VP-1A, VP-1B, VP-2A, VP-2B, VP-3A, and VP-3B) were screened for methane and fixed gases.

Methane was not detected in any of the soil vapor monitoring points. Hydrogen sulfide concentrations ranged from 1.0 to 4.0 ppm.

4.4 Human Health Risk Assessment

As part of the VCPAR, Langan evaluated potential human and ecological receptors at the Site under both the current and anticipated future site use scenarios. The evaluation determined that current and future ecological receptor pathways associated with the Site are considered incomplete.

An HHRA was conducted to further evaluate potential risks to human receptors. The HHRA identifies potentially complete exposure pathways to human receptors and estimates the

associated health risk and hazards based on reasonable maximum exposure (RME) point concentrations of COPCs. Three receptor populations were evaluated in the HHRA, and include:

- Construction workers;
- Commercial/Industrial workers; and,
- Trespassers.

Construction workers, commercial/industrial workers, and trespassers all represent potential future receptors; no other potential human receptor populations were identified. A hypothetical residential receptor was not identified because the Site is zoned industrial and there is no anticipated change in the zoning.

Potentially complete exposure pathways for the construction worker include incidental ingestion of soil, dermal exposure to soil, and inhalation of dust-borne particulates. Potentially complete exposure pathways for the commercial/industrial worker include contact with surface soil (ground surface to one-foot bgs), incidental ingestion of soil, dermal exposure to soil, and inhalation of dust-borne particles. Potentially complete exposure pathways for the trespasser include incidental ingestion of surface soil, dermal exposure to surface soil, and inhalation of dust-borne particulates.

The results of the risk assessment found:

- Groundwater water is not a media of concern.
- No unacceptable non-cancer hazards or cancer risks to the trespasser.
- No unacceptable cancer risks are posed to the construction worker.
- Exceedances of the non-cancer threshold and cancer risks for the commercial/industrial worker from the 0 to 1 ft bgs interval. These results suggest potential unacceptable hazards to this receptor from the surface soil intervals.
- Exceedances of the non-cancer threshold for the construction worker receptor at the 0 to 15 ft bgs soil interval. These results suggest potential unacceptable hazards to this receptor in the absence of an appropriate Health and Safety Plan (HASP) and exposure controls during construction.

The cleanup work plan addressing the risks is presented in Section 5.0 below.

5.0 VOLUNTARY CLEANUP WORK PLAN

The following section describes Langan's selection of a remedial plan for the Site. This remedial plan has been created to address the risks identified in the HHRA. As detailed below, the risks identified to the commercial/industrial worker receptor will be addressed via engineering controls (capping) and institutional controls (environmental covenant requiring cap maintenance). The risks to the construction worker receptor will be addressed through institutional controls (environmental covenant requiring a Materials Management Plan, site-specific HASP, and exposure controls during construction).

5.1 Site Work Permits and Plans

Site work permits and plans will be obtained by the general contractor for the Site prior to the commencement of construction activities. SunCap is proposing to redevelop the Site with a warehouse (i.e., non-residential use). This concept is preliminary and subject to change, but residential site use is not being considered.

5.2 Management of Impacted Soil and Other Materials

Langan prepared a Materials Management Plan (MMP) to support the redevelopment of the Site. The MMP provides procedures for management of materials (e.g., soil, debris, dewatering fluids, etc.) that may be disturbed as part of future construction and utility maintenance at the Site. The MMP includes (but is not limited to) direction on the following topics:

- Preparation of a site-specific HASP;
- Handling of materials during excavation, grading, impervious surface installation, and other intrusive earthwork;
- Storm water and erosion control;
- Vapor, dust, and nuisance control;
- Construction and implementation of a decontamination pad; and,
- Off-site disposal of soil, fluid, regulated construction and demolition wastes, hazardous materials, and asbestos containing materials (ACM).

The MMP is included as Appendix B.

5.3 Engineering Controls - Sitewide Cap

The Site will be capped with either hardscape (i.e. buildings and/or pavement) or landscaped areas with at least 18-inches of clean fill and a demarcation barrier, to prevent contact with soil that may be impacted with COPCs. In this way, the exposure pathways for the commercial/industrial worker receptor will be incomplete and the risk mitigated.

After any intrusive construction, the ground surface will be restored with either hardscape or landscape, as appropriate. In landscaped areas, an engineered cap consisting of at least 18-inches of clean fill will be placed over the existing Site soil. The extent of the engineered cap is shown on Figure 4. In landscaped areas, a demarcation barrier will be placed between the existing Site soil and clean fill. The application of the clean fill material will be performed in accordance with

the geotechnical and engineering designs for the Site. Management of soil fill and import of soil fill is discussed in the MMP (Appendix B).

5.4 Institutional Controls - Environmental Covenant

Three COPCs (1-methylnaphthalene, arsenic, and thallium) were detected in Site soils at concentrations exceeding the applicable Industrial Soil RSLs. As a result, residential use of the property will be restricted through an environmental covenant to be recorded for the Site. The covenant will also require that any future intrusive activities involving soil disturbance or handling be conducted in accordance with a site-specific Materials Management Plan (MMP). The MMP, which will be prepared prior to the start of construction activities, will outline procedures for worker health and safety, as well as proper management, handling, and disposal of soil and groundwater. The covenant will also require restoration of the cap following intrusive activities. In this way, the exposure pathways for the construction worker receptor will be incomplete and the risk mitigated.

A laterally continuous groundwater table was not identified at the Site. Although isolated moisture zones were encountered, a shallow aquifer was not observed. The exceedances reported in groundwater samples collected from temporary monitoring wells are likely attributable to elevated turbidity during evacuate-and-recover sampling rather than to dissolved-phase metal concentrations. Because groundwater is not used as a potable source at the Site or in the surrounding area, and because no aquifer was encountered, the groundwater exposure pathway is considered incomplete.

5.5 Proposed Cleanup Schedule

Pending ADEM approval of the VCPAR and Cleanup Work Plan by the end of March 2026, SunCap anticipates commencing warehouse construction in April 2026. According to the current schedule, the warehouse is expected to be completed by February 2027, which will include installation of the protective cap (either hardscape or 18-inches of clean fill in landscaped areas). Following completion of the warehouse, SunCap will prepare an environmental covenant following Alabama's Uniform Environmental Covenants Act (UECA), ADEM Administrative Code 335-5.

5.6 Certificate of Compliance

Upon completion of activities outlined in this Voluntary Cleanup Work Plan, Langan, on behalf of SunCap, will submit a Certificate of Compliance to the ADEM. Upon submission of the Certificate of Compliance, Langan will request that the ADEM issue a Conditional Letter of Concurrence for the property.

6.0 LIST OF CONTACTS

Below is the list of contacts associated with the preparation of this Voluntary Cleanup Work Plan:

Site Owner/Remediator

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7.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

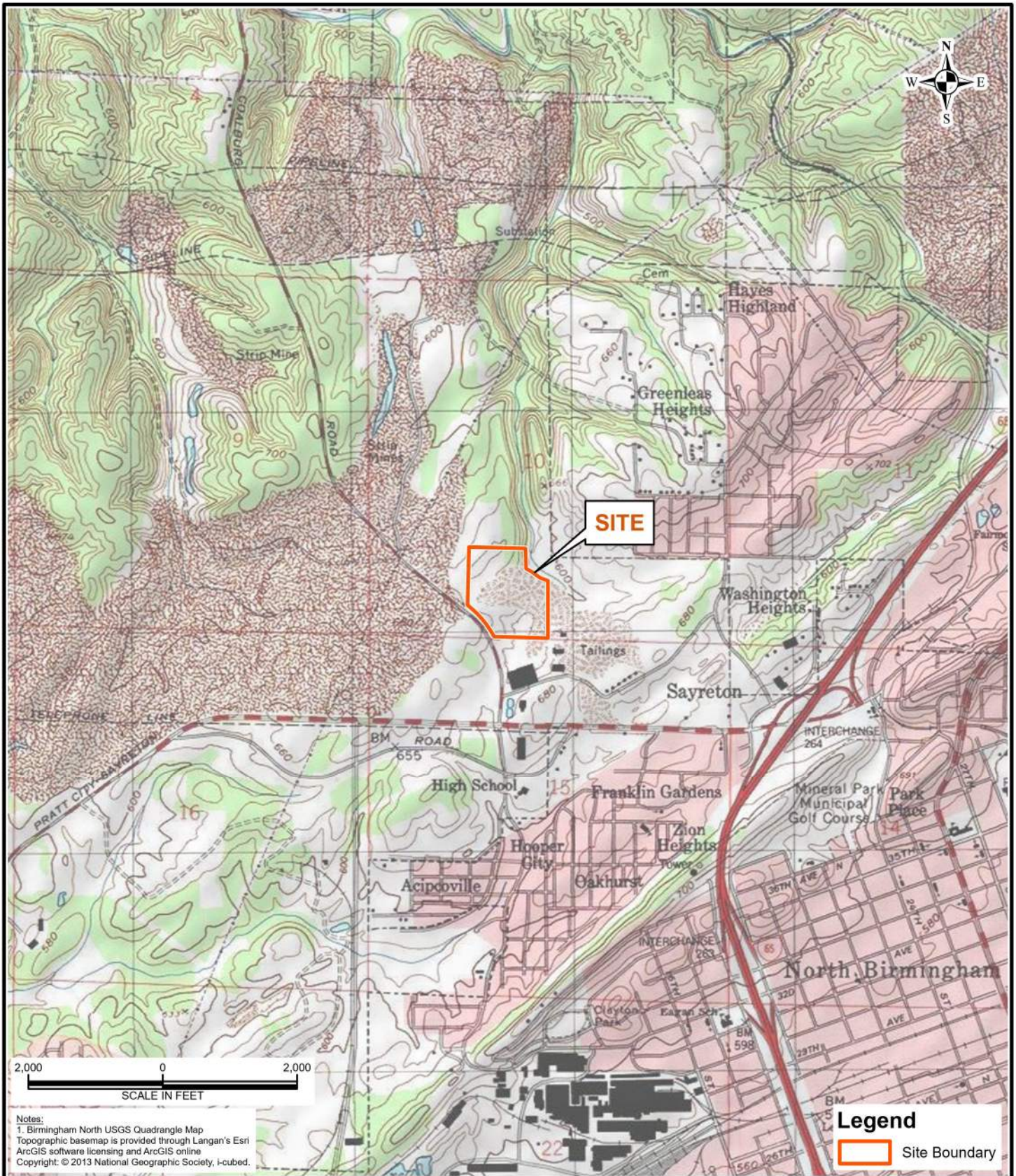


Thomas Antonnacci
Senior Project Manager

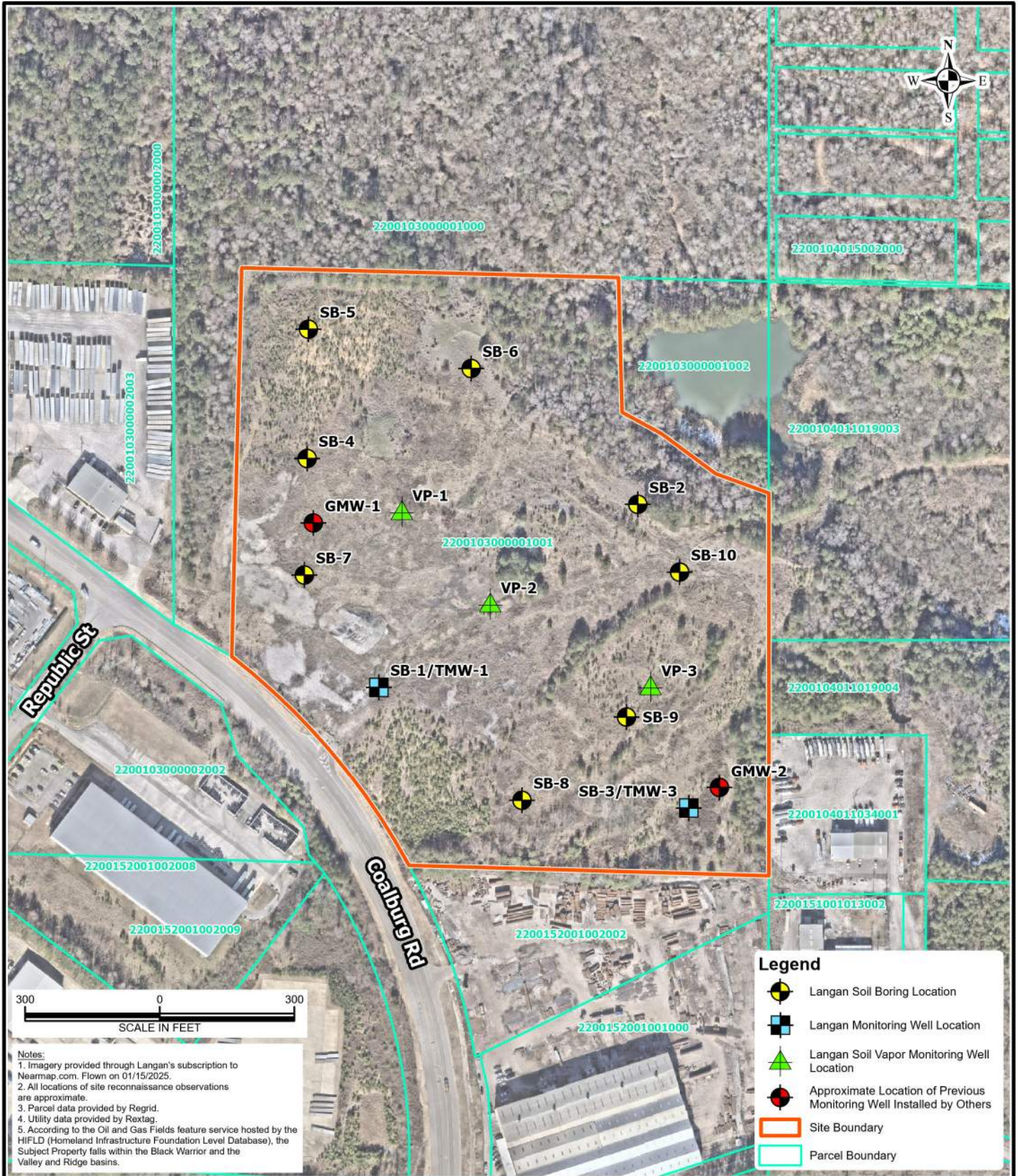


Nicole Rice
Associate Principal

Figures



<p>LANGAN Langan Engineering and Environmental Services, LLC 333 Commerce Street, Suite 1600 Nashville, TN 37201 T: 615.621.6300 F: 7615.621.6301 www.langan.com</p>	Project 4401 COALBURG ROAD BIRMINGHAM JEFFERSON COUNTY AL	Figure Title SITE LOCATION MAP	Project No. 350120001 Date 12/23/2025 Scale 1" = 2,000 feet Drawn By LB	Figure 1
	© 2025 Langan			



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Project
4401 COALBURG ROAD
 BIRMINGHAM
 JEFFERSON COUNTY AL

Figure Title
SAMPLE LOCATION MAP

Project No.
 350120001
 Date
 9/18/2025
 Scale
 1" = 300 feet
 Drawn By
 LB

Figure
 2



Location	SB06.20251016	SB06.20251016
Sample Name	SB06.20251016.0-1	SB06.20251016.6-6.5
Sample Date	10/16/2025	10/16/2025
Sample Depth	0-1	6-6.5
Metals		
Arsenic	9.7	3.8

Location	SB05.20251015	SB05.20251015
Sample Name	SB05.20251015.0-1	SB05.20251015.3-3.5
Sample Date	10/15/2025	10/15/2025
Sample Depth	0-1	3-3.5
Metals		
Arsenic	5	11

Location	SB10.20251017
Sample Name	SB10.20251017.0-1
Sample Date	10/17/2025
Sample Depth	0-1
SVOCs	
1-Methylnaphthalene	0.76 J
Metals	
Arsenic	230
Thallium	2.2

Location	SB09.20251017
Sample Name	SB09.20251017.0-1
Sample Date	10/17/2025
Sample Depth	0-1
Metals	
Arsenic	71

Location	SB08.20251016	SB08.20251016	SB08.20251016
Sample Name	SB08.20251016.0-1	SB08.20251016.6-6.5	SB08.20251016.19.5-20
Sample Date	10/16/2025	10/16/2025	10/16/2025
Sample Depth	0-1	6-6.5	19.5-20
Metals			
Arsenic	18	8.2	11

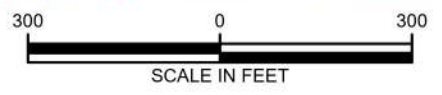
Location	SB07.20251016	SB07.20251016	SB07.20251016
Sample Name	SB07.20251016.0-1	SB07.20251016.31-31.5	SB07.20251016.32.5-33
Sample Date	10/16/2025	10/16/2025	10/16/2025
Sample Depth	0-1	31-31.5	32.5-33
SVOCs			
1-Methylnaphthalene	0.41 J	ND UJ	ND UJ
Metals			
Arsenic	110	16	13

Location	SB01.20251015	SB01.20251015	SB01.20251015	SB01.20251015
Sample Name	SB01.20251015.0-1	SB01.20251015.18-18.5	SB01.20251015.33-33.5	SB01.20251015.37-37.5
Sample Date	10/15/2025	10/15/2025	10/15/2025	10/15/2025
Sample Depth	0-1	18-18.5	33-33.5	37-37.5
SVOCs				
1-Methylnaphthalene	0.3 J	ND UJ	ND UJ	ND UJ
Metals				
Arsenic	93	200	130	73
Thallium	1.1 I	2.9 I	2.1 I	0.11 I

Location	SB03.20251017	SB03.20251017	SB03.20251017
Sample Name	SB03.20251017.0-1	SB03.20251017.19.5-20	SB03.20251017.25.5-26
Sample Date	10/17/2025	10/17/2025	10/17/2025
Sample Depth	0-1	19.5-20	25.5-26
SVOCs			
1-Methylnaphthalene	0.0038 J	0.28 J	0.18 J
Metals			
Arsenic	6.9	74	17

Analyte	US EPA RSL THQ 0.1 Industrial Soil
SVOCs	
1-Methylnaphthalene	0.077
Metals	
Arsenic	3
Thallium	1.2

Exceedance Summary:
10 - Result exceeds EPA RSL THQ 0.1 Industrial Soil



- Legend**
- Langan Soil Boring Location
 - Site Boundary
 - Parcel Boundary

Notes:
 1. All concentrations mg/kg
 2. Imagery provided through Langan's subscription to Nearmap.com. Flown on 01/15/2025.
 3. All locations of site reconnaissance observations are approximate.
 4. Parcel data provided by Regrid.
 5. Utility data provided by Rextag.

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Project
4401 COALBURG ROAD
 BIRMINGHAM
 AL
 JEFFERSON COUNTY

Drawing Title
SOIL ANALYTICAL RESULTS

Project No.	350120001	Figure 3A
Date	12/23/2025	
Scale	1" = 300 feet	
Drawn By	RDB	



Location	GMW01
Sample Name	GMW01
Sample Date	10/21/2025
Metals	
Aluminum	77,000
Antimony	4.6 l
Arsenic	90
Barium	820
Beryllium	9.8
Cadmium	3.1 l
Chromium, Total	120
Cobalt	270
Copper	260
Iron	190,000
Lead	110
Manganese	11,000
Mercury	0.72 l
Nickel	160
Selenium	8.7 l
Thallium	ND U
Vanadium	150
Zinc	1,200

Location	GMW02
Sample Name	GMW02
Sample Date	10/21/2025
Metals	
Aluminum	1,500,000
Antimony	4.8 l
Arsenic	1,500
Barium	15,000
Beryllium	78
Cadmium	6 l
Chromium, Total	1,800
Cobalt	1,700
Copper	3,000
Iron	3,000,000
Lead	1,900
Manganese	40,000
Mercury	4
Nickel	2,600
Selenium	210
Thallium	22
Vanadium	2,400
Zinc	8,700

Location	TMW01
Sample Name	TMW01
Sample Date	10/21/2025
Metals	
Aluminum	330,000
Antimony	7.7 l
Arsenic	800
Barium	3,200
Beryllium	20
Cadmium	5.1 l
Chromium, Total	800
Cobalt	450
Copper	940
Iron	870,000
Lead	420
Manganese	23,000
Mercury	0.48 l
Nickel	730
Selenium	63
Thallium	10
Vanadium	710
Zinc	2,200

Location	TMW03
Sample Name	TMW03
Sample Date	10/21/2025
Metals	
Aluminum	15,000
Antimony	0.42 l
Arsenic	23
Barium	170
Beryllium	2.1
Cadmium	0.29 l
Chromium, Total	29
Cobalt	110
Copper	53
Iron	39,000
Lead	26
Manganese	1,800
Mercury	ND U
Nickel	77
Selenium	3.3 l
Thallium	0.46 l
Vanadium	31
Zinc	180

Analyte	EPA RSL THQ 0.1 Tapwater	EPA RSL THQ 0.1 Groundwater MCL
Metals		
Aluminum	2000	NS
Antimony	0.78	6
Arsenic	0.052	10
Barium	380	2000
Beryllium	2.5	4
Cadmium	0.18	5
Calcium	NS	NS
Chromium, Total	2200	100
Cobalt	0.6	NS
Copper	80	1300
Iron	1400	NS
Lead	10	10
Magnesium	NS	NS
Manganese	43	NS
Mercury	0.063	2
Nickel	39	NS
Potassium	NS	NS
Selenium	10	50
Silver	9.4	NS
Sodium	NS	NS
Thallium	0.02	2
Vanadium	8.6	NS
Zinc	600	NS

Exceedance Summary:
 10 - Result exceeds EPA RSL THQ 0.1 Tapwater
 10 - Result exceeds EPA RSL THQ 0.1 Groundwater MCL

- Legend**
- Approximate Location of Previous Monitoring Well Installed by Others
 - Monitoring Well Location
 - ▭ Site Boundary
 - ▭ Parcel Boundary



Notes:
 1. All concentrations ug/L
 2. Imagery provided through Langan's subscription to Nearmap.com. Flown on 01/15/2025.
 3. All locations of site reconnaissance observations are approximate.
 4. Parcel data provided by Regrid.
 5. Utility data provided by Rextag.

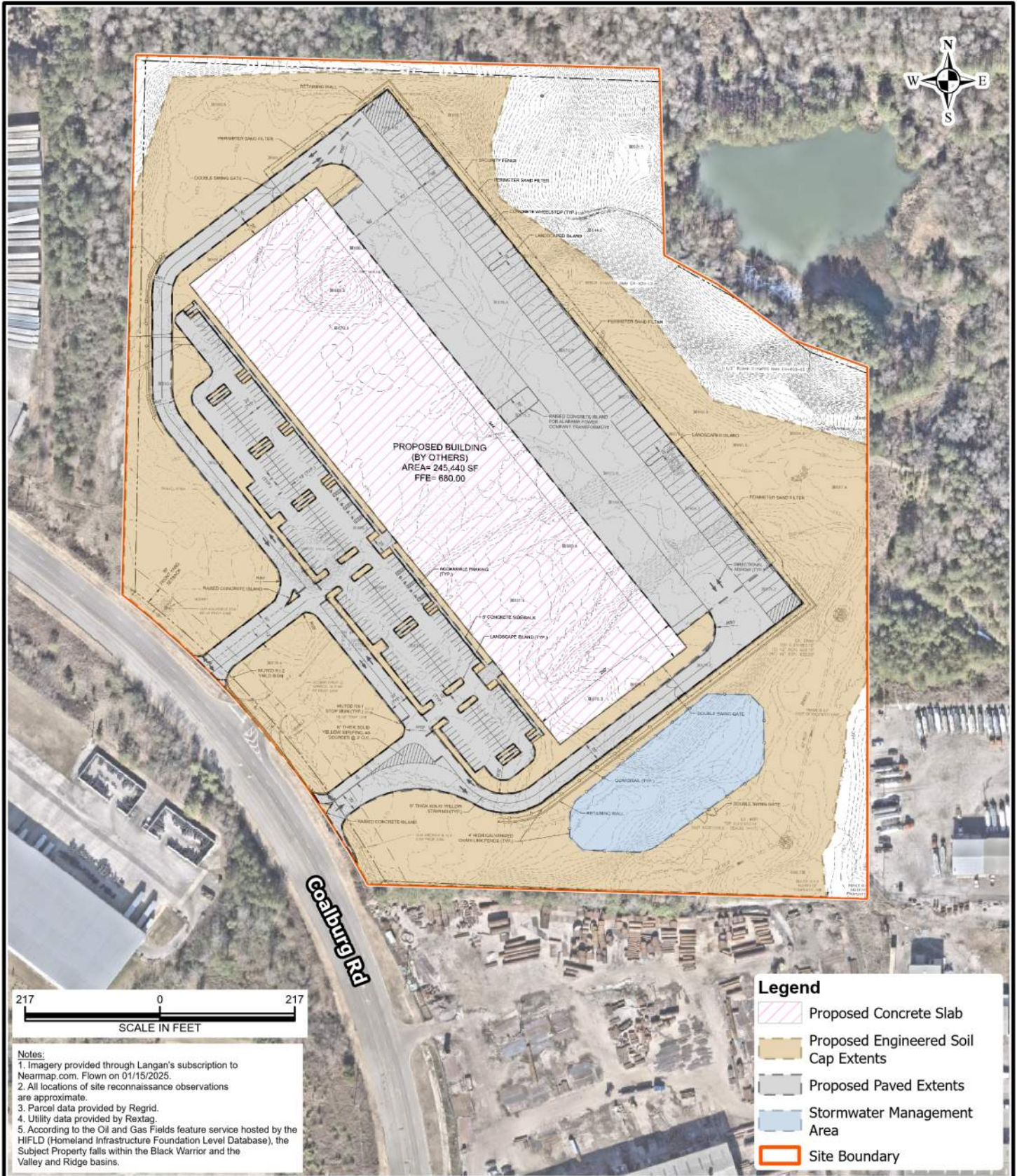
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Project
4401 COALBURG ROAD
 BIRMINGHAM
 JEFFERSON COUNTY AL

Drawing Title
PERCHED WATER ANALYTICAL RESULTS

Project No. 350120001
 Date 1/9/2026
 Scale 1" = 300 feet
 Drawn By LB
 Figure **3B**



Notes:
 1. Imagery provided through Langan's subscription to Nearmap.com. Flown on 01/15/2025.
 2. All locations of site reconnaissance observations are approximate.
 3. Parcel data provided by Regrid.
 4. Utility data provided by Rextag.
 5. According to the Oil and Gas Fields feature service hosted by the HIFLD (Homeland Infrastructure Foundation Level Database), the Subject Property falls within the Black Warrior and the Valley and Ridge basins.

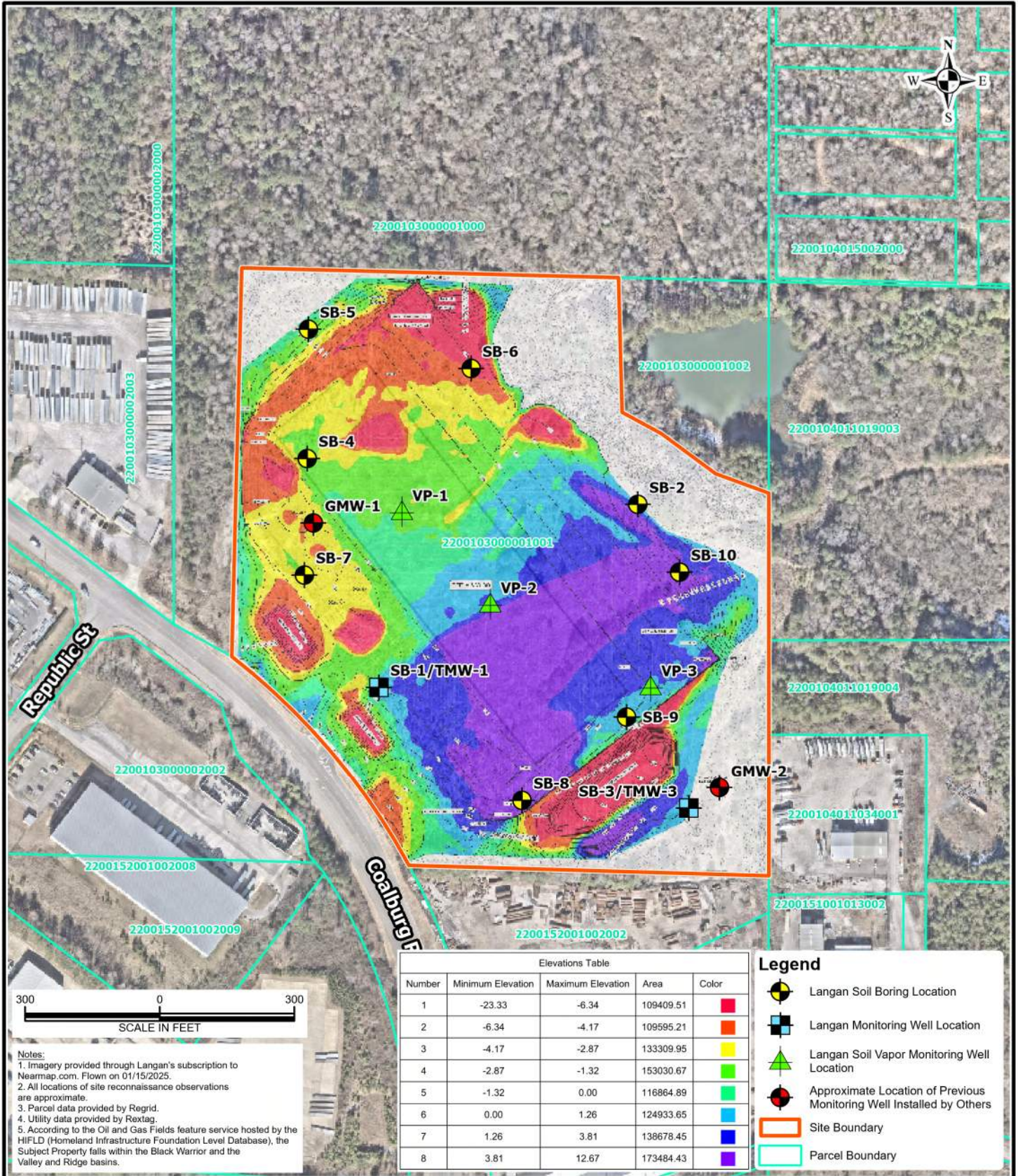
Legend	
	Proposed Concrete Slab
	Proposed Engineered Soil Cap Extents
	Proposed Paved Extents
	Stormwater Management Area
	Site Boundary

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Project
4401 COALBURG ROAD
 BIRMINGHAM
 JEFFERSON COUNTY AL

Figure Title
EXTENTS OF ENGINEERED CAP

Project No. 350120001	Figure 4
Date 01/06/2026	
Scale 1" = 217 feet	
Drawn By LCC	



Elevations Table				
Number	Minimum Elevation	Maximum Elevation	Area	Color
1	-23.33	-6.34	109409.51	Red
2	-6.34	-4.17	109595.21	Orange
3	-4.17	-2.87	133309.95	Yellow
4	-2.87	-1.32	153030.67	Light Green
5	-1.32	0.00	116864.89	Green
6	0.00	1.26	124933.65	Light Blue
7	1.26	3.81	138678.45	Blue
8	3.81	12.67	173484.43	Purple

Legend

- Langan Soil Boring Location
- Langan Monitoring Well Location
- Langan Soil Vapor Monitoring Well Location
- Approximate Location of Previous Monitoring Well Installed by Others
- Site Boundary
- Parcel Boundary

Notes:
 1. Imagery provided through Langan's subscription to Nearmap.com. Flown on 01/15/2025.
 2. All locations of site reconnaissance observations are approximate.
 3. Parcel data provided by Regrid.
 4. Utility data provided by Rextag.
 5. According to the Oil and Gas Fields feature service hosted by the HIFLD (Homeland Infrastructure Foundation Level Database), the Subject Property falls within the Black Warrior and the Valley and Ridge basins.

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Project
4401 COALBURG ROAD
 BIRMINGHAM
 JEFFERSON COUNTY AL

Figure Title
CUT AND FILL MAP

Project No.
 350120001
 Date
 01/06/2026
 Scale
 1" = 300 feet
 Drawn By
 LCC

Figure
5

Appendix A ADEM Application Approval

EDWARD F. POOLOS
DIRECTOR

JEFFERY W. KITCHENS
DEPUTY DIRECTOR



KAY IVEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

October 22 , 2025

Electronically Transmitted

SunCap Property Group, LLC
Mr. Ben Scerri
6101 Carnegie Boulevard, Suite 180
Charlotte, North Carolina

Re: Voluntary Cleanup Program (VCP) Application
4401 Coalburg Road
4401 Coalburg Road, Birmingham, AL35207

Dear Mr. Ben Scerri :

The Alabama Department of Environmental Management (ADEM) has received a Voluntary Cleanup Program Application submitted on September 24, 2025, by Langan Engineering and Environmental LLC, on behalf of SunCap Property Group, LLC, for the above-referenced site. Based on our review in accordance with 335-15-.02, the Application appears complete. The 4401 Coalburg Site has been accepted into the Voluntary Cleanup Program. We wish to commend you for the effort to assess and remediate this site as necessary, and ADEM looks forward to working together.

The site has been issued site number 461-073-25046. Please include this number when submitting information requested by ADEM.

In addition, this letter acknowledges receipt by ADEM of the fees necessary for processing the Application Review. If you have any questions or comments regarding this matter, please contact Jackson Jones, Project Manager at jackson.jones@adem.alabama.gov or at 334-274-4182

Sincerely,

A handwritten signature in black ink, appearing to read "CLC", written over a white background.

Crystal L. Collins, Chief
Redevelopment Unit

CLC/JMJ



Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340 -9359 (FAX)

Coastal Branch
2615 South Broad Street
Mobile, Al, 36605
(251) 450-3400
(251) 479-2593 (FAX)

Appendix B Materials Management Plan

MATERIALS MANAGEMENT PLAN

for

**4401 Coalburg Road
Birmingham, Alabama 35207
ADEM VCP Site ID: 461-073-25046**

Prepared For:

**SunCap Development Group
6101 Carnegie Blvd #180
Charlotte, NC 28209**

Prepared By:

**Langan Engineering & Environmental Services, LLC
400 North Ashley Drive, Suite 2175
Tampa, Florida 33602**



**Thomas Antonacci
Senior Project Manager**



**Nicole Rice
Associate Principal**

LANGAN

**14 January 2026
350120001**

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1.0 INTRODUCTION

On behalf of SunCap Development Group (SunCap), Langan Engineering and Environmental Services, LLC (Langan) has prepared this Materials Management Plan (MMP) for the approximately 32.3-acre property located at 4401 Coalburg Road, Birmingham, Jefferson County, Alabama (the Site). A Site Location Map is provided as Figure 1 and a Site Layout Map is provided as Figure 2.

This MMP was prepared to support the redevelopment of the Site. This MMP provides procedures for materials (e.g., soil, debris, dewatering fluids, etc.) that may be disturbed as part of future construction and utility maintenance at the Site. The chemicals of potential concern (COPCs) identified at the Site during site characterization activities include one polyaromatic hydrocarbon (PAH), 1-methylnaphthalene, and two metals, arsenic and thallium, in soil.

1.1 Site History and Environmental Remedial Activities

The Site has an extensive history of mining-related operations, with documented activities beginning circa 1907 and continuing through the 1960s. During this period, the Site functioned primarily as a staging and stockpiling area for coal mine tailings generated by the former Sayreton Mine. Following the cessation of mining activities in the late 1960s, the property has remained inactive and undeveloped, and no additional mine spoils or related materials have been generated or deposited on-site. As of 2025, a single remaining stockpile of legacy tailings is present within the southwestern portion of the Site.

Ownership records show the following timeline:

- 2003–2004: Joint ownership by SAIIA Construction LLC, Best Coal Inc., and K & H Development Co.
- 2005–2007: Ownership transitioned to SAIIA Construction LLC and K & H Development Co.
- 2008–2011: SAIIA Construction LLC became the sole owner.
- 2012–Present: The property has been owned by SAIIA Coalburg LLC.

According to the Jefferson County Tax Assessor, the Site is classified as “910 – Undeveloped” and unused land. The property is zoned for industrial use and is surrounded by a mix of forested land and industrial buildings.

SunCap proposes to redevelop the Site with a warehouse (i.e., non-residential use). This concept is preliminary and subject to change, but residential site use is not being considered.

Voluntary Cleanup Program

In 2009, an application to participate in the Alabama Department of Environmental Management (ADEM) Voluntary Cleanup Program (VCP) was submitted for an approximately 125-acre property under the name Daniel Payne Drive & Coalburg Road property, which includes the Site and additional properties to the east of the Site. An Assessment Plan was prepared to support the application to participate in the ADEM VCP and included a July 2002 Phase I ESA, April 2004 Phase II ESA, and June 1998 Phase II Letter Report. These previous reports were associated

with the southeast portion of the larger 125-acre property, located approximately 3,000 feet southeast of the Site.

In 2011, a Phase II Investigation was conducted by GM&C for a 25-acre property which included the Site. Arsenic was identified in surficial soil at the Site at concentrations above Alabama Risk Based Corrective Action (ARBCA) screening levels, and detected concentrations of arsenic, chromium, and lead exceeded United States Environmental Protection Agency (USEPA) Ecological Screening Values. The investigation was approved by the ADEM in June 2011; however, no subsequent cleanup plan was submitted, and the Daniel Payne Drive & Coalburg Road Property was deactivated as a Brownfields Site in June 2016.

Site Assessment Activities

In 2025, Langan completed site assessment activities which included collection of soil and water samples for analysis of Target Analyte List (TAL) metals and polycyclic aromatic hydrocarbons (PAHs), and field screening of soil vapor monitoring points to assess the potential presence of methane. Mine spoils were observed from ground surface to approximately 40 feet bgs on the central and eastern portions of the Site. Sporadic areas of spoils were encountered on the western portion of the Site.

A total of 22 soil samples were collected from 10 soil borings. Concentrations of PAHs and/or metals did not exceed the USEPA Regional Screening Levels (RSLs) for Industrial Soil, except for 1-methylnaphthalene, arsenic, and thallium. The maximum detected concentration of 1-methylnaphthalene in soil was 0.76 milligrams per kilogram (mg/kg), the maximum detection of arsenic in soil was 230 mg/kg, and the maximum detected concentration of thallium in soil was 2.9 mg/kg. Soil analytical results are shown on Figure 3A.

A total of four water samples were collected from four temporary monitoring wells. The temporary monitoring wells included two converted soil borings (SB-01/TMW-1 and SB-03/TMW-3) as well as two previously installed temporary wells (GMW-2 and GMW-4) from an earlier site investigation. Based on the limited water volumes and the sufficiently low recharge rates observed in the temporary monitoring wells, groundwater samples were collected using an "evacuate-and-recover" method. Although this technique enabled sample collection from the low-yield wells, the resulting turbidity levels were elevated and may have influenced the analytical results. PAHs did not exceed either the Tapwater RSLs or USEPA Maximum Contaminant Levels (MCLs). Eighteen metals exceeded their respective Tapwater RSLs; however, only eleven of those metals exceeded their corresponding MCLs. Screening the analytical results against Tapwater RSLs and MCLs represents a conservative assessment, as groundwater is not utilized as a potable water supply at the Site or in the surrounding vicinity. Further, due to the limited recharge in each well, well development and purging activities were minimal, resulting in elevated turbidity in all collected samples. In accordance with ADEM guidance, groundwater samples were not filtered; therefore, the results reflect total (unfiltered) concentrations and may overestimate true dissolved-phase groundwater conditions. Additionally, isolated moisture zones were encountered in some soil borings during this and previous investigations; however, the majority of borings did not identify groundwater to depths of approximately 60 feet bgs. A laterally

continuous water table (characteristic of a water-bearing unit within fill material) was not observed anywhere on the Site. Perched water analytical results are shown on Figure 3B.

Although the identified COPCs are not considered a source of soil vapor contamination, vapor monitoring points were installed to assess the potential presence of methane. Six soil vapor points were screened for methane and fixed gases. Methane was not detected in any of the soil vapor monitoring points. Hydrogen sulfide concentrations ranged from 1 to 4 parts per million (ppm).

1.2 Purpose

This MMP was developed to support future disturbance activities of subsurface materials at the Site. This MMP has been prepared to specify procedures to be followed during excavation and grading activities to prevent exposure of COPCs and dispersal of impacted materials during the execution of work at the Site.

This MMP will be updated, as necessary, if new information on Site conditions and COPCs is obtained, or if new requirements are set forth by SunCap or ADEM.

2.0 NOTIFICATIONS

SunCap must be contacted prior to the start of construction or excavation activities to coordinate the scope and execution of proposed excavation work.

If an underground storage tank (UST) is encountered during soil disturbance activities, all work must be halted immediately, and the SunCap Construction Manager (CM) must be notified without delay.

Before contacting ADEM, next steps should be coordinated with SunCap and the CM. Any discovered UST must be closed in full compliance with ADEM regulations, including proper tank registration and submission of a notification of intent to close.

Please note: Any new spills or releases resulting from site activities must be reported in accordance with all applicable local, state, and federal spill reporting requirements.

3.0 PROJECT OVERSIGHT AND CERTIFICATION OF WORK

Disturbance of subsurface materials impacted with COPCs will be completed in accordance with this MMP. The work will be documented and submitted to SunCap and their designated representatives. An Environmental Professional (EP) will be on-Site during construction as needed or as requested by SunCap.

All contractors performing work (project personnel) that may expose them to soil or groundwater, must abide by their company's Site-Specific Health and Safety Plan (HASP). The Site-Specific HASP provides a mechanism for establishing safe working conditions at the Site during site disturbance by identifying potential hazards, exposures, and controls to be implemented in relation to planned excavation, grading, or other work that could disturb impacted materials. The Site-Specific HASP also describes the hazards and controls related to the Site-specific COPCs. Refer to Section 5.2 of this MMP for additional requirements of the Site-Specific HASP. If project

personnel encounter heavily-impacted soil (See Section 6.8), USTs, or other conditions indicative of unknown environmental impacts, all disturbance activities shall cease, and the EP and SunCap CM notified. Additional measures may be put into place, including the need for personnel trained in hazardous waste health and safety in accordance with OSHA HAZWOPER regulations (29 CFR 1910.120[e]).

4.0 RECORD KEEPING AND REPORTING

A logbook will be maintained by the earthwork contractor (contractor). The logbook will document relevant information pertaining to the implementation of the remedies. Documentation will include, but may not be limited to, the following:

- Dates and times of excavation activities;
- List of project personnel conducting these activities;
- Description of excavation activities;
- Location and time of any excavation work;
- Approximate quantities of disturbed materials;
- Locations of any material staging areas on-site;
- Methods used for handling of materials;
- Locations of material placement on-site;
- Quantity of materials taken off-site and their final disposition
- Waste profiles and manifests for materials disposed off-site; and
- Documentation of any contingency plan items.

The earthwork contractor shall provide weekly work summaries to SunCap and the EP with the information listed above.

5.0 HEALTH AND SAFETY

5.1 Exposure and Effects of Site-Specific COCs

All Site workers must be made aware of the Site's identified COCs (described in Section 1.1), known environmental health and safety hazards, and COC exposure pathways (e.g., ingestion, inhalation, dermal contact) prior to beginning work. Specifically, the site workers will be made aware that soil at the Site is impacted with one PAH, 1-methylnaphthalene, and two metals, arsenic and thallium. The PAH 1-methylnaphthalene exceeded the Industrial Soil RSL of 0.077 milligrams per kilogram (mg/kg) in five soil samples with a maximum detected concentration of 0.76 mg/kg. Arsenic exceeded the Industrial Soil RSL of 3 mg/kg at 20 soil samples with a maximum detection of 230 mg/kg. Thallium exceeded the Industrial Soil RSL of 1.2 mg/kg at three soil samples with a maximum detection of 2.9 mg/kg.

As noted in Section 1.1, Langan field screened the soil vapor locations for hydrogen sulfide and

the maximum reading was 4 ppm. Hydrogen sulfide may be encountered during earthwork and the contractor may be required to perform additional evaluation and mitigation.

The contractor is responsible for informing their workers and subcontractors of the Site conditions and potential risks and for establishing a HASP to be implemented by their workers and subcontractors.

5.2 Site-Specific Health and Safety Plan

The contractor will be required to prepare a Site-Specific HASP that will include, but not be limited to, the following components:

- Identification of Key Project Personnel – Identification and qualifications of the on-Site and off-site health and safety personnel responsible for implementation of health and safety procedures.
- Training – A description of health and safety training requirements for all project personnel. It is each contractor's responsibility to determine the level and type of health and safety training required for their workers in accordance with applicable laws and regulations. Site workers that may be exposed to soil, sediment, groundwater, or surface water may need to be 40-hour trained in hazardous waste health and safety in accordance with OSHA HAZWOPER regulations (29 CFR 1910.120[e]) if deemed applicable. Additional training requirements will include attending an initial Site orientation prior to engaging in any on-Site activities and daily health and safety briefings.
- Medical Surveillance – A description of appropriate medical examinations required for project personnel to conduct the duties associated with implementing the construction activities, if applicable.
- Site Hazards – A description of chemical and physical hazards associated with the Site and a discussion of identifying and mitigating foreseeable chemical and physical hazards associated with the work. Foreseeable chemical and physical hazards may include, but will not be limited to, hazards associated with exposure to COPCs, heavy equipment operation during construction activities, weather, biological hazards, material handling, and work around water.
- Personal Safety Equipment and Protective Clothing – A description of personal safety equipment and protective clothing to be used. This discussion will include identification of expected levels of protection for the work, and the action levels for PPE upgrades.
- Air Monitoring – The suspension of airborne soil and dust should be minimized to the smallest degree possible. The contractor's HASP should contain provisions for air monitoring, action levels, dust control measures should action levels be exceeded, and other measures necessary to protect Site workers, the neighboring properties and the general public from chemical, dust or other exposure hazards. Contractor should consider whether personal hydrogen sulfide monitoring is warranted based on site history and previous investigations. Previous investigation reports can be provided upon request.

- Equipment Cleaning – The methods and procedures for decontamination of project personnel, vehicles, and equipment.
- Excavation Safety – Excavation and trenching safety procedures as specified in 29 Code of Federal Regulations (CFR) 1926 Subpart P including, but not limited to, soil classification, excavation inspections, protective systems, and designated competent persons.
- Procedures and Programs – Standard operating procedures and safety programs as required by applicable sections of Section 1910 of 29 CFR 1910 and 29 CFR 1926.
- Contingency Plan – A contingency plan to be implemented in the event of various emergency or non-routine events. The contingency plan will set forth procedures for addressing spill prevention and emergency response procedures, emergency vehicular access/egress, evacuation, emergency notification and contacts, and emergency medical procedures.

6.0 SOIL MANAGEMENT

6.1 Excavation, Grading, and Other Excavation Earthwork

All earthwork activities must be implemented in accordance with the Site-Specific HASP to mitigate the potential hazards and worker exposure during excavation activities.

All site soil is assumed to be impacted with COPCs. The flow chart to be followed for handling of materials during excavation, grading, and impervious surface installation is provided as Figure 4. Earthwork activities will be implemented in accordance with the site-specific HASP to mitigate the potential for hazards and worker exposure during excavation activities. If encountered, heavily impacted soil, as defined in Section 6.8, must be segregated and stored, in accordance with Section 6.2, for subsequent sampling and disposal, in accordance with Section 9.0.

6.2 Temporary On-Site Staging

Soil that is designated for stockpiling will be temporarily staged in designated areas at the Site. Temporary stockpiles are soils that are mounded or stored for over 24 hours. Additional staging areas may be constructed as needed. Stockpile areas will meet the following minimum requirements:

- As discussed in Sections 1.1, 5.1 and 6.1 above, 1-methylnaphthalene, arsenic, and thallium were detected in soil at concentrations that exceed the Industrial Soil RSLs. Excavated soil exhibiting environmental impacts (as described in Section 6.8), shall be placed onto, and covered with construction liner of sufficient strength to prevent puncture during use. The soil stockpiles must be covered at the end of each day. The stockpile cover must be secured to prevent exposure of the stockpiled soil during weather events. Equipment and procedures selected to place and remove the soil will minimize the potential to jeopardize the integrity of the liner. Additional procedures to be followed for environmentally impacted soil are detailed in Section 6.8.

- All stockpiled areas will be inspected daily by the site contractor and periodically by the EP and noted deficiencies will be promptly addressed. Additional protective measures, such as covering, may be required if deemed necessary by the EP, to prevent erosion or dust generation. The inspection and corrective actions must be documented in the logbook referenced in Section 4.0.

6.3 Soil Import and Re-Use Criteria

Soil Import Criteria

All soil imported to the Site must be characterized prior to import. Analytical data and/or certifications documenting the clean fill disposition must be provided to the EP and SunCap CM for review and concurrence with Site requirements at least one week before the material is imported to and used at the Site.

Unless a virgin quarry certification is provided, at a minimum, proposed imported material must be sampled and tested at a frequency of one five-point composite sample per 5,000 cubic yards of material, and analysis must include the following, unless directed otherwise by SunCap and/or the EP:

- Volatile organic compounds (VOCs) by USEPA Method 8260
- Semi-volatile organic compounds (SVOCs) by USEPA Method 8270
- Priority pollutant list metals by USEPA Method 6010
- Polychlorinated biphenyls (PCBs) by USEPA Method 8082
- Pesticides by USEPA Method 8081
- Herbicides by USEPA Method 8151
- PFAS by USEPA Method 1633

On-Site Soil Re-Use Criteria

On-site soil re-use must follow the flow chart provided as Figure 4. As noted above, soil across the Site is impacted by 1-methylnaphthalene, arsenic, and thallium above the USEPA Industrial Soil RSL. The highest concentrations of these COPCs were detected at SB-1, SB-7, and SB-10 (Figure 2). Impacted soils above the USEPA Industrial Soil RSL planned to remain on-Site must be capped with hardscaped areas (i.e., buildings or pavement) or with at least 1.5-feet of imported, clean soil with a demarcation barrier.

If soil is encountered exhibiting visual or olfactory signs of contamination, consult with SunCap or EP for approval to proceed for soil testing for on-site re-use. The sampling results must be presented to SunCap and the EP for review and soil may only be re-used if approved by SunCap or the EP.

6.4 Soil Export

Soil export must be approved by SunCap and comply with requirements of Section 9.0.

6.5 Dust Control and Air Monitoring

Best practices for minimization of dust include limiting the area of soil excavations at any given time, and application of dust or odor suppressants to exposed excavation and stockpile surfaces. Dust suppressants shall be applied to areas of the Site where construction activities are likely to cause the generation of dust which may create a hazard and/or nuisance. Such activities include general earthwork and the excavation and loading of soil.

Dust suppressants may include PFAS-free water (fire-hydrant water sampling results must be provided prior to use and approved by SunCap) or plastic sheeting. If the contractor recommends other dust and vapor measures, the contractor must first obtain approval from the EP and the SunCap CM to ensure these are consistent with all Site requirements (i.e. must not utilize PFAS-containing suppressants). The contractor shall take precautions and all steps necessary to ensure that the use of dust suppressants does not cause any runoff off-site. Stockpiled soil shall be covered as a preventative measure against dust generation.

Community Air Monitoring Plan

Community air monitoring for dust and odors is not anticipated; however, if conducted it shall be conducted by the EP's field inspector. If community air monitoring is conducted, then continuous monitoring on the perimeter of the work zones for nuisance odors, particulate matter with a diameter of 10 micrometers or less (PM10), and visible dust is recommended for all ground intrusive activities such as soil excavation and handling activities. The work zone is defined as the general area in which machinery is operating in support of development. A DustTrak (or equivalent) air monitor equipped with filters to detect PM10, will be used to monitor the work zone and for periodic monitoring of PM10 during excavation activities. The Site perimeter will be visually monitored for fugitive dust emissions.

The following actions will be taken based on visual dust observations:

- If the downwind particulate level is 100 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression must be employed. Work may continue with dust suppression techniques provided that downwind PM10 levels do not exceed 150 $\mu\text{g}/\text{m}^3$ above the background level and provided that no visible dust is migrating from the work area.
- If, after implementation of dust suppression techniques, downwind PM10 levels are greater than 150 $\mu\text{g}/\text{m}^3$ above the background level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM10 concentration to within 150 $\mu\text{g}/\text{m}^3$ of the upwind level and in preventing visible dust migration.

6.6 Decontamination Pad

All equipment in contact with known impacted Site soil, suspected contaminated soil (per Section 6.8), or groundwater (if encountered) will be decontaminated prior to removal from the Site. Decontamination shall consist of dry brushing at a minimum. Solids from decontamination shall be collected and placed in a location approved by the EP or will be managed for off-site disposal in accordance with Sections 6.2 and 9.0.

If vehicle or equipment tires/treads will contact impacted soil, a decontamination pad/truck wash will be constructed. Truck tires/treads and undercarriages for all vehicles and equipment coming in contact with impacted soil will be swept free of soil and debris. Truck tires and undercarriages will be pressure-washed before leaving the Site, as necessary. At a minimum, the decontamination pad will have a 30-mil low-permeability polyethylene liner, be surrounded by berms and sloped to a collection sump to contain and collect fluids, and have sidewalls to mitigate, to the extent practicable, errant overspray, especially when decontaminating large equipment that comes into contact with potentially impacted soil. Handling of decontamination fluids shall be in accordance with Section 8.0.

Equipment and vehicles, including haul trucks, shall be staged on pavement and away from areas of soil disturbance when not in use. Access routes for equipment and vehicles shall be chosen to avoid contact with Site soils by vehicles and equipment to the extent possible. Egress points for all vehicles and equipment transport from the Site will be kept clean of dirt and other material during any excavation work. Trucks transporting soil will be securely covered prior to exiting the Site.

6.7 Stormwater Pollution Prevention Plan

The contractor will be responsible for minimizing erosion and sedimentation, and consequently stormwater pollution. Measures will include physical methods to control and/or divert surface water flows and to limit the potential for erosion and migration of Site soil via wind (dust) or storm water.

The following stormwater pollution prevention practices will be implemented for excavation work, unless otherwise approved by the EP. These requirements are in addition to any Authority Having Jurisdiction (AHJ) requirements:

- Frequent watering of excavations and fill areas to minimize wind erosion during construction;
- Inlet and outlet protection using filter fabric and silt socks, within and downslope of soil disturbance areas;
- Site perimeter and soil stockpile protection using silt fence and/or silt sock;
- Temporary sediment basins and sump pits, if necessary for construction dewatering; and
- Stabilized construction entrance/exit pads in the event excavation work results in truck tires and undercarriages coming into contact with impacted soil.

The contractor will be responsible for the installation and maintenance of all temporary erosion and sediment (E&S) control measures. All silt fence, inlet protection, and silt sock checks at catch basins will be maintained as follows:

- The barrier and silt sock check condition will be inspected regularly during excavation activities or after every storm event, whichever comes first. Any necessary repairs shall be made immediately;
- Accumulated sediments will be removed as required to keep the barrier and silt sock check functional;
- All undercutting or erosion of the silt fence toe anchor or silt sock will be repaired immediately with backfill material (e.g., stone);
- Silt fence will be repaired and/or replaced as needed;
- Areas used for contractor storage of hazardous substances and materials (e.g., fuels) will be lined with plastic and inspected regularly for any leakage of chemicals or fuels to the ground. Any such leakage will be immediately reported to the EP and SunCap CM;
- E&S control measures identified in the plan will be inspected to ensure that they are operating correctly. Where discharge locations or points are accessible, they shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters;
- Locations where vehicles enter or exit the Site will be inspected daily for evidence of off-site sediment tracking;
- The existing conditions of the adjacent streets will be maintained. Any soil tracked off-site onto adjacent streets must be cleaned and brought back on-site or disposed at an approved disposal facility on an as needed basis as determined by the contractor or the EP; and
- All stockpiles will be immediately surrounded by silt socks to prevent any migration of excavated soil from these locations.

6.8 Heavily-Impacted Soil

In accordance with the flow chart included as Figure 4, should heavily-impacted (i.e., staining, odors, elevated instrument readings, etc.) soil be identified by the contractor during subsurface work, SunCap and the EP should be immediately notified, and the impacted soil should be excavated and stockpiled adjacent to the excavation area or at an alternate approved area in accordance with Section 6.2.

The potential heavily-impacted soil would include soil with:

- Strong odors,
- High volatile organic compound readings based on air monitoring,
- Oil or oil-staining,

- Tar-like or sludge material,
- Other staining or discoloration,
- Separate phase liquid (e.g., pure chemicals, petroleum products, etc.), and/or
- Any other condition determined by the EP of being indicative of contamination.

The locations of any soil stockpiles associated with unexpected conditions should be in consultation with the EP and shall be delineated and appropriate erosion and sediment control measures, such as a silt fence or straw bales, shall be installed downslope of the excavation and stockpile areas. Small quantities can be containerized in 55-gallon steel drums as an alternate to stockpiles. Drums must be labeled with the generation date and as “pending characterization” until receipt of analytical data.

The suspected heavily-impacted soil must be stockpiled and covered by a 15-mil low-permeability construction liner or containerized in a lined and covered roll-off dumpster. Soil will be sampled for characterization by the EP. Following proper characterization, stockpiled soil will be managed for off-site disposal in accordance with Sections 6.2 and 9.0, unless otherwise approved by SunCap or the EP.

The contractor or EP will notify the SunCap CM if suspected impacted materials are not managed in accordance with this MMP.

7.0 DEBRIS MANAGEMENT

Additional debris (e.g., inactive utilities, remnant foundations or other concrete materials) may be encountered during the proposed soil disturbance activities. Debris will be decontaminated by removing soil particles to the extent practicable. If necessary, the debris will be pressure-washed with water or other methods to remove the potentially impacted media. Debris can then be characterized and disposed off-site in accordance with federal, state, and local regulations at a facility approved by SunCap. Wash water must be contained and managed in accordance with the procedures described in Section 8.0 and Figure 5.

8.0 DEWATERING AND FLUIDS MANAGEMENT

Isolated moisture zones were encountered in some soil borings during Langan’s site assessment and previous investigations; however, the majority of borings did not identify groundwater to depths of approximately 60 feet bgs. Of the four temporary monitoring wells sampled as part of Langan’s site assessment activities, depth to water ranged from 29.1 to 34.05 feet bgs at the time of sampling, and only limited water volumes were present in the temporary monitoring wells. A laterally continuous water table (characteristic of a water bearing unit within fill material) was not observed anywhere on the Site.

Fluids management will comply with applicable local, state, and federal regulations and project specific permits. Any groundwater that is removed via dewatering of excavations will be managed following the flow chart process provided as Figure 5. Efforts must be made to divert

surface water runoff away from excavations to reduce generation of contaminated water. Collected groundwater may be characterized and disposed off-site in accordance with all applicable requirements. Alternately, if approved by SunCap, the contractor may obtain a permit to discharge collected groundwater to the sewer system servicing the Site from the applicable sanitary authority. Permit applications must be reviewed and approved by the EP before any discharge can take place. If discharged to the local sewer system, groundwater will be pre-treated and sampling of discharge will be completed as required per the discharge approval.

The truck wash and equipment decontamination areas, if deemed necessary, will include a sump and low permeability liner to collect wash water and a sedimentation tank to separate the solids from the wash water. Any containerized water will be characterized for off-site disposal. Alternately, if approved by SunCap, the contractor may obtain a permit to discharge collected wash water to the sewer system servicing the Site from the applicable sanitary authority. Permit applications must be reviewed and approved by the EP before any discharge can take place. If discharged to the local sewer system, fluids will be pre-treated and sampling of discharge will be completed as required per the discharge approval.

9.0 OFF-SITE DISPOSAL OR RECYCLING

Any soil, debris (e.g., inactive utilities, remnant foundations or other concrete materials), or fluid material designated for off-site disposal or debris designated for recycling must be sampled and characterized by the EP in accordance with the chosen facility requirements and all applicable local, state, and federal requirements. Unless directed otherwise by SunCap, the EP or following additional characterization as noted above, known impacted soils must be sent off-site to an appropriately permitted disposal facility.

Any debris that have been in direct contact with known impacted soils or potentially impacted media (i.e. as defined in Section 6.8) will be decontaminated by removing soil particles to the extent practicable. If necessary, the debris will be pressure-washed with water or other methods to remove the potentially impacted media. Debris can then be characterized and disposed off-site in accordance with federal, state and local regulations. These materials must not be stored at the Site longer than 120 days. Waste profiles and waste manifests will be executed by SunCap, or their authorized representative, as the generator of the material. Soil may not be shipped off-site for reuse on another property without the approval of SunCap. Wash water must be contained and managed in accordance with the procedures described in 8.0 and Figure 5.

The contractor will oversee the load-out of all material for off-site disposal. Once the loading of any container, dump truck, or trailer has been completed, the material must be immediately transported to the off-site disposal and/or recycling facility. All transport of material must be performed by licensed haulers in accordance with appropriate local, state, and federal regulations. Loaded vehicles leaving the Site must be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate federal, state, local, and Alabama Department of Transportation (ALDOT) requirements (or other applicable transportation

requirements). Copies of waste manifests and bills of lading must be provided to the EP and SunCap CM.

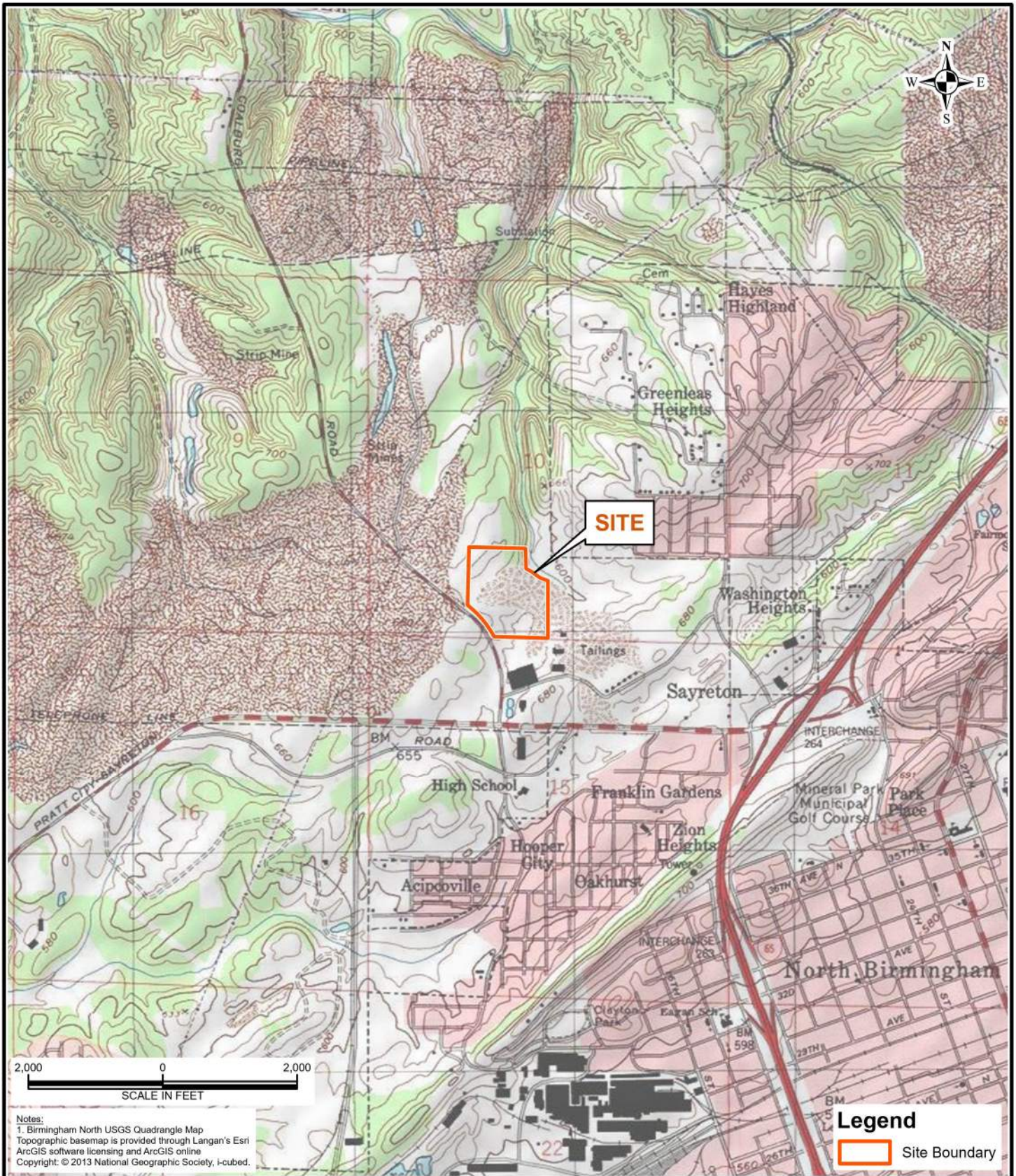
10.0 CONTINGENCY PLAN

If an unsuspected UST or evidence of heavily-impacted media is encountered during excavation activities, project personnel must report the discovery immediately to the EP and SunCap CM, who will then implement appropriate response measures, as necessary. If discovered, any UST must be investigated and closed in accordance with ADEM requirements.

Any spill or release of petroleum products or hazardous substances caused by project personnel must be immediately cleaned and reported to the EP and SunCap CM. The EP and SunCap CM will document the incident and implement appropriate response measures and initiate reporting, as necessary.

Any hazardous waste derived at the Site will be handled, stored, transported, and disposed in accordance with applicable local, state and federal regulations.

Figures



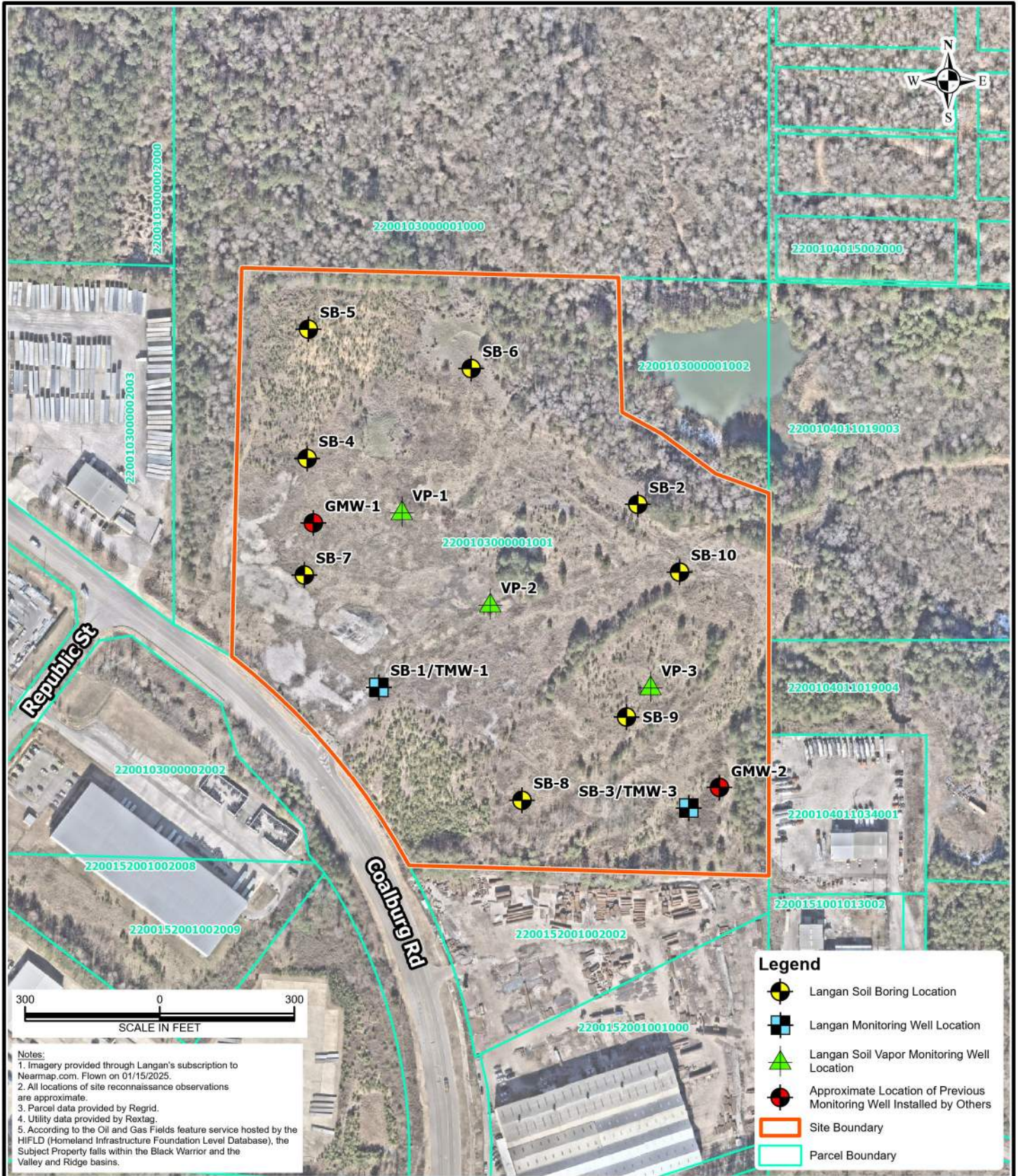
LANGAN
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Project
**4401 COALBURG
 ROAD**
 BIRMINGHAM
 JEFFERSON COUNTY AL

Figure Title
**SITE
 LOCATION
 MAP**

Project No.
 350120001
 Date
 12/23/2025
 Scale
 1" = 2,000 feet
 Drawn By
 LB

Figure
1



Notes:
 1. Imagery provided through Langan's subscription to Nearmap.com. Flown on 01/15/2025.
 2. All locations of site reconnaissance observations are approximate.
 3. Parcel data provided by Regrid.
 4. Utility data provided by Rextag.
 5. According to the Oil and Gas Fields feature service hosted by the HIFLD (Homeland Infrastructure Foundation Level Database), the Subject Property falls within the Black Warrior and the Valley and Ridge basins.

Legend

- Langan Soil Boring Location
- Langan Monitoring Well Location
- Langan Soil Vapor Monitoring Well Location
- Approximate Location of Previous Monitoring Well Installed by Others
- Site Boundary
- Parcel Boundary

 Langan Engineering and Environmental Services, LLC 333 Commerce Street, Suite 1600 Nashville, TN 37201 T: 615.621.6300 F: 7615.621.6301 www.langan.com	Project	4401 COALBURG ROAD BIRMINGHAM JEFFERSON COUNTY AL	Figure Title	SAMPLE LOCATION MAP	Project No.	350120001	Figure 2
	Date	9/18/2025	Scale	1" = 300 feet	Drawn By	LB	



Location	SB06.20251016	SB06.20251016
Sample Name	SB06.20251016.0-1	SB06.20251016.6-6.5
Sample Date	10/16/2025	10/16/2025
Sample Depth	0-1	6-6.5
Metals		
Arsenic	9.7	3.8

Location	SB05.20251015	SB05.20251015
Sample Name	SB05.20251015.0-1	SB05.20251015.3-3.5
Sample Date	10/15/2025	10/15/2025
Sample Depth	0-1	3-3.5
Metals		
Arsenic	5	11

Location	SB10.20251017
Sample Name	SB10.20251017.0-1
Sample Date	10/17/2025
Sample Depth	0-1
SVOCs	
1-Methylnaphthalene	0.76 J
Metals	
Arsenic	230
Thallium	2.2

Location	SB09.20251017
Sample Name	SB09.20251017.0-1
Sample Date	10/17/2025
Sample Depth	0-1
Metals	
Arsenic	71

Location	SB08.20251016	SB08.20251016	SB08.20251016
Sample Name	SB08.20251016.0-1	SB08.20251016.6-6.5	SB08.20251016.19.5-20
Sample Date	10/16/2025	10/16/2025	10/16/2025
Sample Depth	0-1	6-6.5	19.5-20
Metals			
Arsenic	18	8.2	11

Location	SB07.20251016	SB07.20251016	SB07.20251016
Sample Name	SB07.20251016.0-1	SB07.20251016.31-31.5	SB07.20251016.32.5-33
Sample Date	10/16/2025	10/16/2025	10/16/2025
Sample Depth	0-1	31-31.5	32.5-33
SVOCs			
1-Methylnaphthalene	0.41 J	ND UJ	ND UJ
Metals			
Arsenic	110	16	13

Location	SB01.20251015	SB01.20251015	SB01.20251015	SB01.20251015
Sample Name	SB01.20251015.0-1	SB01.20251015.18-18.5	SB01.20251015.33-33.5	SB01.20251015.37-37.5
Sample Date	10/15/2025	10/15/2025	10/15/2025	10/15/2025
Sample Depth	0-1	18-18.5	33-33.5	37-37.5
SVOCs				
1-Methylnaphthalene	0.3 J	ND UJ	ND UJ	ND UJ
Metals				
Arsenic	93	200	130	73
Thallium	1.1 I	2.9 I	2.1 I	0.11 I

Location	SB03.20251017	SB03.20251017	SB03.20251017
Sample Name	SB03.20251017.0-1	SB03.20251017.19.5-20	SB03.20251017.25.5-26
Sample Date	10/17/2025	10/17/2025	10/17/2025
Sample Depth	0-1	19.5-20	25.5-26
SVOCs			
1-Methylnaphthalene	0.0038 J	0.28 J	0.18 J
Metals			
Arsenic	6.9	74	17

Analyte	US EPA RSL THQ 0.1 Industrial Soil
SVOCs	
1-Methylnaphthalene	0.077
Metals	
Arsenic	3
Thallium	1.2

Exceedance Summary:
10 - Result exceeds EPA RSL THQ 0.1 Industrial Soil



- Legend**
- Langan Soil Boring Location
 - Site Boundary
 - Parcel Boundary

Notes:
 1. All concentrations mg/kg
 2. Imagery provided through Langan's subscription to Nearmap.com. Flown on 01/15/2025.
 3. All locations of site reconnaissance observations are approximate.
 4. Parcel data provided by Regrid.
 5. Utility data provided by Rextag.

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Project
4401 COALBURG ROAD
 BIRMINGHAM
 AL
 JEFFERSON COUNTY

Drawing Title
SOIL ANALYTICAL RESULTS

Project No.	350120001	Figure 3A
Date	12/23/2025	
Scale	1" = 300 feet	
Drawn By	RDB	



Location	GMW01
Sample Name	GMW01
Sample Date	10/21/2025
Metals	
Aluminum	77,000
Antimony	4.6 l
Arsenic	90
Barium	820
Beryllium	9.8
Cadmium	3.1 l
Chromium, Total	120
Cobalt	270
Copper	260
Iron	190,000
Lead	110
Manganese	11,000
Mercury	0.72 l
Nickel	160
Selenium	8.7 l
Thallium	ND U
Vanadium	150
Zinc	1,200

Location	GMW02
Sample Name	GMW02
Sample Date	10/21/2025
Metals	
Aluminum	1,500,000
Antimony	4.8 l
Arsenic	1,500
Barium	15,000
Beryllium	78
Cadmium	6 l
Chromium, Total	1,800
Cobalt	1,700
Copper	3,000
Iron	3,000,000
Lead	1,900
Manganese	40,000
Mercury	4
Nickel	2,600
Selenium	210
Thallium	22
Vanadium	2,400
Zinc	8,700

Location	TMW01
Sample Name	TMW01
Sample Date	10/21/2025
Metals	
Aluminum	330,000
Antimony	7.7 l
Arsenic	800
Barium	3,200
Beryllium	20
Cadmium	5.1 l
Chromium, Total	800
Cobalt	450
Copper	940
Iron	870,000
Lead	420
Manganese	23,000
Mercury	0.48 l
Nickel	730
Selenium	63
Thallium	10
Vanadium	710
Zinc	2,200

Location	TMW03
Sample Name	TMW03
Sample Date	10/21/2025
Metals	
Aluminum	15,000
Antimony	0.42 l
Arsenic	23
Barium	170
Beryllium	2.1
Cadmium	0.29 l
Chromium, Total	29
Cobalt	110
Copper	53
Iron	39,000
Lead	26
Manganese	1,800
Mercury	ND U
Nickel	77
Selenium	3.3 l
Thallium	0.46 l
Vanadium	31
Zinc	180

Analyte	EPA RSL THQ 0.1 Tapwater	EPA RSL THQ 0.1 Groundwater MCL
Metals		
Aluminum	2000	NS
Antimony	0.78	6
Arsenic	0.052	10
Barium	380	2000
Beryllium	2.5	4
Cadmium	0.18	5
Calcium	NS	NS
Chromium, Total	2200	100
Cobalt	0.6	NS
Copper	80	1300
Iron	1400	NS
Lead	10	10
Magnesium	NS	NS
Manganese	43	NS
Mercury	0.063	2
Nickel	39	NS
Potassium	NS	NS
Selenium	10	50
Silver	9.4	NS
Sodium	NS	NS
Thallium	0.02	2
Vanadium	8.6	NS
Zinc	600	NS

Exceedance Summary:
 10 - Result exceeds EPA RSL THQ 0.1 Tapwater
 10 - Result exceeds EPA RSL THQ 0.1 Groundwater MCL

- Legend**
- Approximate Location of Previous Monitoring Well Installed by Others
 - Monitoring Well Location
 - ▭ Site Boundary
 - ▭ Parcel Boundary



Notes:
 1. All concentrations ug/L
 2. Imagery provided through Langan's subscription to Nearmap.com. Flown on 01/15/2025.
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Project
4401 COALBURG ROAD
 BIRMINGHAM
 JEFFERSON COUNTY AL

Drawing Title
PERCHED WATER ANALYTICAL RESULTS

Project No. 350120001
 Date 1/9/2026
 Scale 1" = 300 feet
 Drawn By LB
 Figure **3B**

Figure 4
Soils Management Plan
4401 Coalburg Road
Birmingham, Alabama 35207

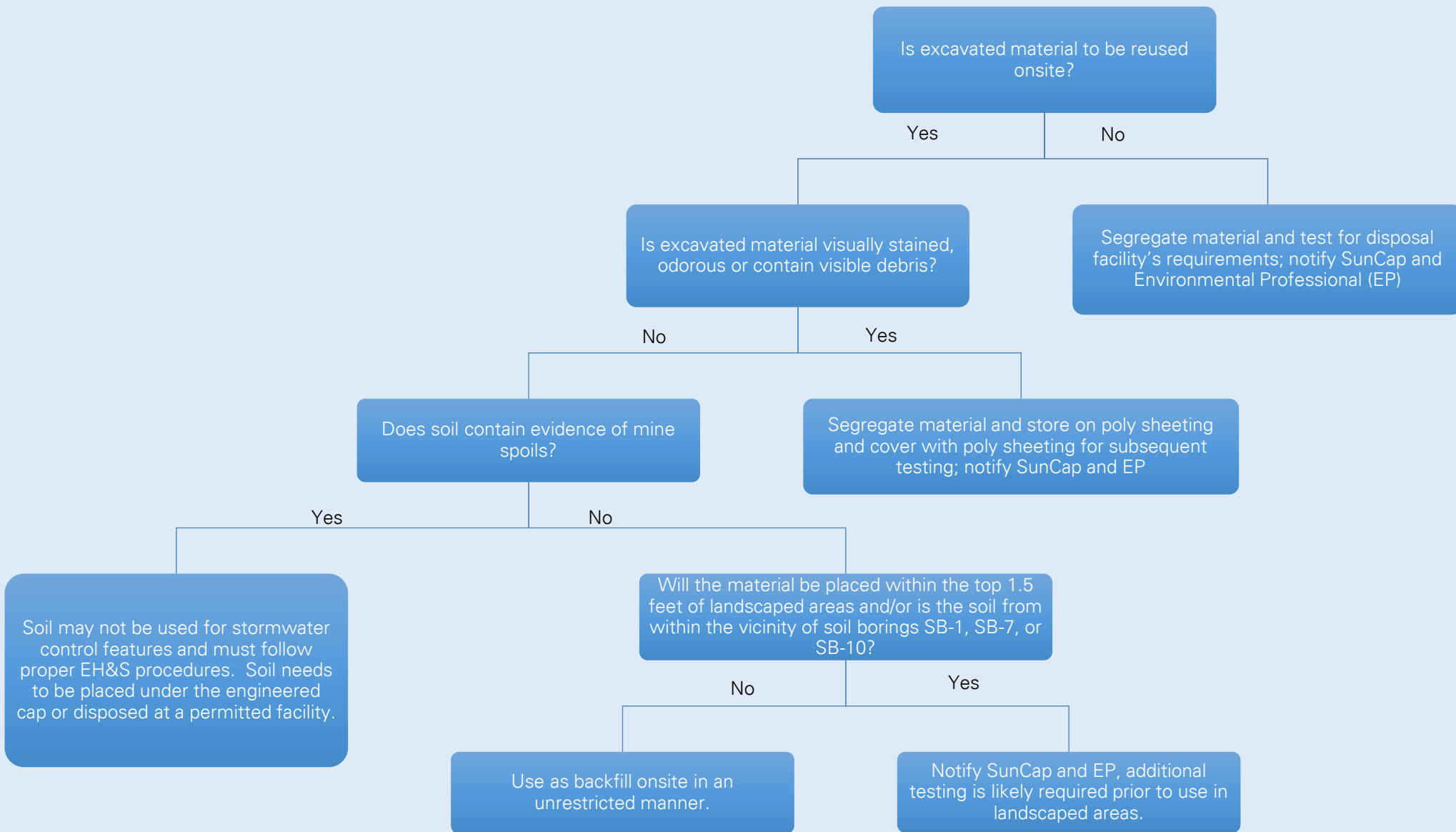


Figure 5
Water Management Plan
4401 Coalburg Road
Birmingham, Alabama 35207

