### **Anderson Geneva**

United States Steel Corporation DSHW-2022-000251

Div of Waste Management and Radiation Control

# JAN 0 5 2022

January 5, 2022

Mr. Doug Hansen, Director Division of Waste Management and Radiation Control Utah Department of Environmental Quality P.O. Box 144880 Salt Lake City, UT 84114-4880

## RE: Submittal of Revised Site Management Plan for the Former Closed Hazardous Waste Impoundments (CHWIs) Area Solid Waste Management Units (SWMUs): SI-1, SI-2, SI-3, and GW-4.14 (CHWIs Groundwater) – Former Geneva Steel Facility, Vineyard, Utah

Dear Mr. Hansen:

United States Steel Corporation (USS) and Anderson Geneva (AG) are pleased to submit this revised Site Management Plan (SMP) for the former Closed Hazardous Waste Impoundments (CHWIs) area that includes Solid Waste Management Units (SWMUs) SI-1 (Tar Decanter Sludge Surface Impoundment), SI-2 (Acid Waste Surface Impoundment), SI-3 (Miscellaneous Waste Surface Impoundment), and GW-4.14 (CHWIs Groundwater) at the former Geneva Steel facility in Vineyard, Utah. This revised version incorporates your comments received on December 8, 2021.

We respectfully request that you commence the public comment process and thereafter approve the CHWIs area SMP as soon as possible so that appropriate actions as specified in the SMP can begin to be implemented. A corresponding Environmental Covenant for the former CHWIs area will be submitted to you separately. Please contact us at your convenience if you have any questions on this matter.

cc: B. Mustoe, AECOM T. Messersmith, AECOM File: AG, USS

## **ACKNOWLEDGEMENT**

As authorized representatives for United States Steel Corporation and Anderson Geneva Development LLC/Ice Castle Retirement LLC, we the undersigned approve this document for submittal to the Utah Department of Environmental Quality.

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and, that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are penalties for submitting false information, including the possibility of fine and imprisonment."

Mark Rupnow Director – Environmental Remediation United States Steel Corp.

Stewart Park

Executive Vice President/Project Manager Anderson Geneva Development, Inc.

January 5, 2022

## SITE MANAGEMENT PLAN Former Closed Hazardous Waste Impoundment Site Management Plan Area, Former Geneva Steel Facility Vineyard, Utah, January 2022

1. This Site Management Plan ("*SMP*") pertains to certain solid waste management units ("*SWMUs*") within the Former Closed Hazardous Waste Impoundment (CHWI) Area (sometimes referred to herein collectively as "*Former CHWI SMP Area*"), depicted at **Exhibit A** and described at **Exhibit B** to this SMP. The Former CHWI SMP Area is a roughly 15.42-acre area which contains residual levels of arsenic and naphthalene in the sediment and surface soil. The Former CHWI SMP Area is located south of 1600 North, to the east of the proposed Mill Road on the west, and west of Geneva Road within the Town of Vineyard, Utah County, Utah, and within the former Geneva Steel facility comprising some 1,680 acres of real property ("*Site*").

In addition, a new SWMU GW-4.14, Former CHWI Groundwater Management Area, has been identified within the Former CHWI SMP Area. The Former CHWI Groundwater Management Area is a roughly 9.07-acre groundwater plume approximately 12 feet below ground surface impacted by residual concentrations of benzene within the shallow unconfined groundwater aquifer. GW-4.14 will be sometimes referred to herein collectively as "Former CHWI Groundwater Management Area" as depicted at **Exhibit A** and described at **Exhibit C** to this SMP.

The SWMUs associated with the Former CHWI SMP Area are:

- SI-1, Tar Decanter Sludge Surface Impoundment
- SI-2, Acid Waste Surface Impoundment
- SI-3, Miscellaneous Waste Surface Impoundment, and
- GW-4.14, Former CHWI Groundwater.

Restrictions on the Former CHWI SMP Area and the Former CHWI Groundwater Management Area are addressed herein at Sections 10 and 11.

The Site has been subject to that certain *Final Post-Closure Permit for Post-Closure Care and Facility-Wide Corrective Action*, dated May 14, 2004 and updated January 26, 2010 ("*Permit*") issued to United States Steel Corporation, Anderson Geneva, LLC, and Ice Castle Retirement Fund, L.L.C. as co-permittees under the Permit (collectively "*Co-Permittees*"). The administrative record relating to the Permit is maintained at the Division of Waste Management and Radiation Control. Because all of the material at the Former CHWI SMP Area that was formerly regulated under the Post-Closure Care permit has been relocated to the Corrective Action Management Unit ("*CAMU*"), the Post-Closure Care permit will be transferred to the CAMU and the Former CHWI SMP Area SWMUs will be managed under this SMP.

## Background

2. There were three RCRA-regulated unlined surface impoundments (SI-1, SI-2, and SI-3) which were constructed in native soil in 1980 to comply with RCRA regulations to manage

wastes from the coke by-products operations related to the steel making plant. The impoundments were operated from 1980 to 1986. In 1988-1989, the three impoundments were consolidated and closed by mixing slag with the wastes to stabilize and solidify the materials. The stabilized material was then capped with layers of carbide, an HDPE liner and soils as approved by UDEQ. Post-closure care included routine inspections and maintenance of the CHWIs.

- a. In May and June 2020 corrective action was undertaken at the Former CHWI Area. This consisted of excavation of the material contained within the CHWIs and relocation to the Corrective Action Management Unit (CAMU) located elsewhere on the former Geneva Steel facility. The excavated areas were backfilled with UDEQ approved on-site soils and material.
- b. The presence of the three RCRA surface impoundments resulted in impacted groundwater beneath the CHWIs, which was addressed by installation of a groundwater collection trench and treatment system downgradient of the impoundments in 1992. The intercepted collected groundwater was treated initially through a coke by-products wastewater treatment plant, then later through a granular activated carbon unit prior to being discharged in accordance with existing permits. Groundwater sampling at the CHWIs has occurred on a semi-annual basis since 1990 as part of existing permit requirements. Removal of the CHWI material also removed the source soils for groundwater impacts at the CHWIs. UDEQ approved cessation of the groundwater interceptor trench operations after the impacted materials associated with the CHWIs were successfully relocated to the CAMU.
- c. Soils, groundwater and other media on and within the Former CHWI SMP Area and the Former CHWI Groundwater Management Area have undergone investigation, characterization, delineation, and remediation of potential impacts. After excavation of impacted materials from the CHWIs and prior to backfilling the excavations, confirmation samples were collected from designated locations of the excavation floor and walls along the excavated perimeter. The subsequent Human Health Risk Evaluation (HHRE) included data from both the confirmation samples within the excavated area and the backfill material that was used. Portions of the Former CHWI SMP Area may contain residual low-levels of arsenic and naphthalene. Based on the results of the corrective action and the final HHRE, the cumulative risk for indoor worker, outdoor worker, and construction worker are less than a cancer risk of 1E-04 and a non-cancer risk health index of less than 1. See Letter Report of Findings and Human Health Risk Evaluation for SWMU SI-1, SI-2, and SI-3, Closed Hazardous Waste Impoundments (CHWIs) – Former Geneva Steel Facility, Vineyard, Utah EPA #UTD 009086133, AG and USS to UDEQ, dated March 31, 2021. The Former CHWI SMP Area was granted Corrective Action Complete With Controls. See Human Health Risk Evaluation for SWMU SI-1, SI-2, SI-3, Closed Hazardous Waste Impoundments (CHWIs), Former Geneva Steel Facility, Vineyard, Utah, EPA #UTD 009086133, by UDEQ, dated April 28, 2021.

d. After the groundwater collection and treatment system was shutdown in August 2020 following removal of excavated source material from the CHWI, the groundwater was given time to equilibrate. Thirteen groundwater wells were sampled in April 2021. Residual low-levels of benzene were detected in one well. The risk evaluation performed for the CHWIs groundwater was conducted for the indoor commercial/industrial worker and construction worker, who are the potential receptors at the site. The cumulative risk for the given receptors is within the risk management range of 1E-04 and 1E-06 for carcinogens and a hazard index of less than one for noncarcinogens. See Human Health Risk Evaluation for the Former Closed Hazardous Waste Impoundments Groundwater, SWMU GW-4.14 – Former Geneva Steel Facility, Vinevard, Utah EPA #UTD 009086133, AG and USS to UDEQ, dated August 12, 2021. The Former CHWI Groundwater Management Area was granted Corrective Action Complete With Controls. See Approval of the Human Health Risk Evaluation for the Former Closed Hazardous Waste Impoundments Groundwater, SWMU GW-4.14 – Former Geneva Steel Facility, Vineyard, Utah EPA #UTD 009086133, UDEQ, dated September 2, 2021.

3. There are no significant risks to ecological receptors in the Former CHWI Area. See Concurrence of No Significant Ecological Effects and Waiver of Site-Wide Ecological Risk Assessment Requirement – Former Geneva Steel Facility, UDEQ dated September 22, 2009 ("Eco Letter Concurrence").

4. This SMP includes activity and use limitations and other controls that are needed to ensure that residual levels of arsenic and naphthalene remaining within the Former CHWI SMP Area and the residual levels of benzene within the Former CHWI Groundwater Management Area are adequately managed for protection of human health and the environment.

5. Activity and use limitations and other controls will be implemented for the Former CHWI SMP Area and the Former CHWI Groundwater Management Area pursuant to this SMP and the Former CHWI SMP Area Environmental Covenant that will be recorded at the Utah County Recorder's office against the Former CHWI SMP Area including the Former CHWI Groundwater Management Area (*"Environmental Covenant"*).

6. The HHREs, Eco Letter Concurrence, Groundwater Modification Letters and SMP satisfy the requirements of Utah Admin. Code R315-101-6 and, together with the Environmental Covenant, support a determination by the Director ("*Director*") of the Division of Waste Management and Radiation Control ("*Division*") that corrective action is complete with controls within the Former CHWI SMP Area including the Former CHWI Groundwater Management Area.

7. Based on the foregoing, the SMP and Environmental Covenant restrictions are protective of human health and the environment. The low levels of residual contamination do not affect, and the SMP and Environmental Covenant do not apply to, properties adjacent to the Former CHWI Area.

## Site Management

8. The following management requirements pertain to and shall be implemented within the Former CHWI SMP Area including the Former CHWI Groundwater Management Area pursuant to Utah Admin. Code R315-101-6 and Utah Code Ann. §19-6-108.3.

9. Land Use. The Former CHWI SMP Area may not be used for residential uses ("*Prohibited Uses*"). With the exception of Prohibited Uses, the Former CHWI SMP Area may be used for any other land use allowed by local zoning ("*Allowed Uses*") subject to the management and controls specified in Sections 10 and 11. Should users of the Former CHWI SMP Area plan to develop any use without the management and controls specified in Sections 10 and 11, the owner of the Former CHWI Area, or any part thereof, and any users shall, prior to developing the use, demonstrate to the Director's satisfaction that the risk levels of the proposed use will not exceed the applicable risk exposure level. Soil related to the former CHWI cannot be removed from the Site without proper characterization and proper disposal as approved by the UDEQ.

10. <u>Land Use Controls</u>. Allowed Uses may be conducted within the Former CHWI Area, subject to the following management and engineering controls: that portion of the Former CHWI SMP Area used for commercial/industrial land use shall be managed by limiting exposure through employing a hard surface, a building structure, or a vegetative, rock, synthetic or soil cover of clean-fill topsoil. A person planning to employ some other means to manage exposure shall obtain prior written approval from the Director.

<u>11.</u> <u>Groundwater Use</u>. Groundwater under the Former CHWI Groundwater Management Area and within the shallow unconfined aquifer, as defined in the *Fall 2007 Semi-Annual Groundwater Sampling Report* (URS January 2008), shall not be used for potable, culinary, domestic, process, irrigation or any other purposes except groundwater monitoring. These restrictions do not apply to deeper aquifers beneath the Former CHWI Groundwater Management Area.

- a. <u>Engineering Controls</u>. For future construction of first floor occupied structures within the Former CHWI Groundwater Management Area, vapor mitigation or further sampling and evaluation of soil vapors will be required to confirm risk levels are less than risk criteria. Vapor mitigation systems may include a vapor barrier, with a passive or active sub-slab ventilation system. The property owner shall coordinate with the Division prior to the design and installation of any vapor barrier or mitigation system.
- b. <u>Monitoring</u>. There are three existing monitoring wells (MW-3, MW-5, and MW-16) as depicted at **Exhibit A** that will be used to monitor the Former CHWI Groundwater Management Area. The following standards will apply:
  - i. <u>Replacement Wells</u>. The wells may be replaced or abandoned to accommodate development and construction of improvements within the Former CHWI Groundwater Management Area; however, replacement wells must be located where they will monitor the Former CHWI Groundwater Management Area. If

any monitoring well is damaged or removed due to the construction of improvements and facilities within the Former CHWI Groundwater Management Area, a replacement well will be installed to allow for continued monitoring. If appropriate, installation of a replacement well may be deferred until after construction is completed. Replacement wells will be placed in locations approved by the Director. Installation, development, sampling, plugging and abandonment of monitoring wells shall comply with the *Standard Operating Procedures, Verification Investigation Work Plan, Appendix D.* 

- <u>ii.</u> <u>Monitoring Schedule</u>. Groundwater monitoring within the Former CHWI Groundwater Management Area shall begin not more than 120 days after final approval of this SMP by the Director. Groundwater sampling shall be conducted in accordance with the *Verification Investigation Work Plan*. Semi-annual groundwater monitoring shall continue on the Former CHWI Groundwater Management Area until it can be demonstrated that monitoring of the Former CHWI Groundwater Management Area may be terminated as specified in Section 14 of this SMP or as otherwise may be established to the satisfaction of the Director.
- <u>iii.</u> <u>Analytical Parameters</u>. Groundwater samples from the Former CHWI Groundwater Management Area shall be analyzed for benzene, ethyl benzene, toluene, xylene and naphthalene using EPA Method 8260B or equivalent as approved by the Director.
- iv. <u>Reporting</u>. A periodic report on the data gathered during and analytical results from each sampling event shall be submitted to the Director in accordance with the following schedule:

Sampling Events	Report to the Director
June-November	January 15
December-May	July 15

12. <u>Access</u>. The Environmental Covenant provides rights of reasonable access to the Former CHWI SMP Area at any time after the effective date of the Environmental Covenant for monitoring of compliance with the Environmental Covenant and for complying with the terms and conditions of the Permit and this SMP. All those subject to the Environmental Covenant are required to allow compliance with the Permit and SMP. Nothing in this SMP expands or limits any access and inspection authorities of the Division and the Director under Utah law.

a. <u>Notice</u>. Except as provided in this subsection, any party or person desiring to access the Former CHWI SMP Area under authority of the Environmental Covenant shall provide notice to the then current owner of the affected portion of the Former CHWI SMP Area not less than 48 hours in advance of accessing the

Former CHWI Area, except in the event of an emergency condition which reasonably requires immediate access. In the event of any such emergency condition, the party exercising this access right will provide notice to the then current owner of the affected portion of the Former CHWI SMP Area requiring access as soon thereafter as is reasonably possible. The Division, the Director, and their authorized officers, employees, or representatives may, at any reasonable time and upon presentation of appropriate credentials, have access to the Former CHWI Area.

b. Disruption. To the extent that Co-Permittees or the Director, or their authorized representatives, conduct any activities on or within any portion of the Former CHWI Area, they will use reasonable efforts to comply with the then current owner's security needs and requirements and will conduct such activities so as to cause the least amount of disruption to the use of the affected portion of the Former CHWI SMP Area as may be reasonably possible. Any person who conducts any activities shall repair and replace any improvements or landscaping damaged on the affected portion of the Former CHWI SMP Area by such activities. The Director and his authorized representatives will use reasonable efforts to comply with the then current owner's security needs and requirements and will attempt to minimize disruption of the use of the affected portion of the Former CHWI Area. The Director will determine what needs, requirements, and activities are reasonable. Should the Director's activities cause damage to the affected portion of the Former CHWI SMP Area improvements or landscaping, the injured party may present a claim against the State of Utah in accordance with Utah law.

13. <u>Reports</u>. Upon request, the Co-Permittees shall submit to the Director a report confirming that the terms and conditions of this SMP and the Environmental Covenant are being substantially satisfied.

<u>14.</u> <u>Termination</u>. If at any time, groundwater sampling within the Former CHWI Groundwater Management Area indicates that approved groundwater corrective action levels have been met for three consecutive years of sampling and this observation is supported by a statistical trend analysis, the Co-Permittees may request that a Corrective Action Complete Without Controls ("*CACWOC*") determination be made for groundwater sampling monitoring for the Former CHWI Groundwater Management Area. Upon approval of a CACWOC determination for the Former CHWI Groundwater Management Area, the groundwater monitoring requirement for this SMP and the Environmental Covenant for the Former CHWI Groundwater Management Area may be terminated.

15. <u>Site Management Contacts</u>. Inquiries concerning the SMP should be directed to the following:

Anderson Geneva Geneva Property Manager 1250 E 200 S STE 1D Lehi, UT 84043 801-766-4442

#### **United States Steel Corporation**

Vice President Environmental Affairs United States Steel Corporation Penn Liberty Plaza 1 1350 Penn Avenue, Suite 200 Pittsburgh, PA 15222-4211 412-433-5916

#### Director

Division of Waste Management and Radiation Control Utah Department of Environmental Quality P.O. Box 144880 Salt Lake City, UT 84114-4880 801-536-0200

The Director shall be notified promptly in writing of any change in the contact information for Co-Permittees. The Co-Permittees shall be notified promptly in writing of any change in the contact information of the Director.

#### 16. <u>References</u>.

- Final Post-Closure Permit for Post-Closure Care and Facility-Wide Corrective Action, dated May 14, 2004 and updated January 26, 2010 by UDEQ to USS and Geneva Steel. Anderson Geneva has replaced Geneva Steel as Co-permittee with USS on the Permit.
- Letter Report of Findings and Human Health Risk Evaluation for SWMU SI-1, SI-2, and SI-3, Closed Hazardous Waste Impoundments (CHWIs) – Former Geneva Steel Facility, Vineyard, Utah EPA #UTD 009086133, AG and USS to UDEQ, dated March 31, 2021
- Human Health Risk Evaluation for SWMU SI-1, SI-2, SI-3, Closed Hazardous Waste Impoundments (CHWIs), Former Geneva Steel Facility, Vineyard, Utah, EPA #UTD 009086133, by UDEQ, dated April 28, 2021.
- Human Health Risk Evaluation for the Former Closed Hazardous Waste Impoundments Groundwater, SWMU GW-4.14 – Former Geneva Steel Facility, Vineyard, Utah, EPA #UTD 009086133, Ag and USS to UDEQ, August 12, 2021
- Approval of the Human Health Risk Evaluation for the Former Closed Hazardous Waste Impoundments Groundwater, SWMU GW-4.14 – Former Geneva Steel Facility, Vineyard, Utah EPA #UTD 009086133, UDEQ, dated Sep. 2, 2021.
- Confirmation of No Significant Ecological Effects and Request for Waiver of Ecological Risk Assessment Requirements for Former Geneva Steel Facility, URS, April 15, 2009

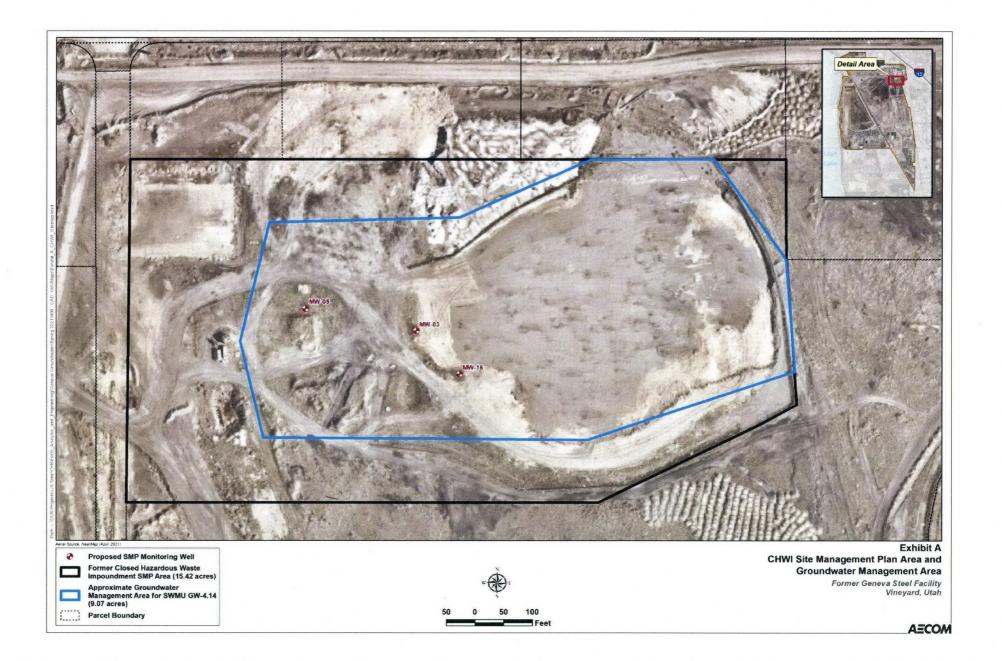
- Concurrence of No Significant Ecological Effects and Waiver of Site-wide Ecological Risk Assessment Requirements – Former Geneva Steel Facility, Vineyard, Utah, UDEQ, September 22, 2009
- Fall 2007 Semi-Annual Groundwater Sampling Report, URS January 2008
- 2008 Facility-Wide Groundwater Investigation Letter Report of Findings, URS April 29, 2009
- Approval of Comments of Site-Wide Groundwater Monitoring System, SWMUG 4.0 - Former Geneva Steel Facility, UDEQ, September 21, 2009
- Approval of Modification of Site-Wide Groundwater Monitoring System, SWMUG 4.0 Former Geneva Steel Facility, UDEQ, October 12, 2009
- Tier 2 Soil Solid Waste Management Units Corrective Action Complete Status for Underlying Groundwater SWMUs, Former Geneva Steel Facility, UDEQ, December 9, 2009
- 2008 Facility-Wide Groundwater Investigation Letter Report of Findings, URS, April 29, 2009
- Risk Evaluation Approach for CAMU Related SWMUs and Verification Investigations. Former Geneva Steel Facility, Vineyard, Utah, EPA #UTD 009086133. UDEQ, October 30, 2019
- Approval of Revised Addendum to the Letter Report of Findings for Characterization of Site Soils for Beneficial Re-use as SWMU Backfill Area 1. #/UTD 009086133. UDEQ, October 30, 2019.
- Revised Remediation Goals for Soil. Former Geneva Steel Facility. #UTD 009 086 133. USS and AGDI, 2018
- Letter Report of Findings for Characterization of Site Soils for Beneficial Re-Use as SWMU Backfill. Former Geneva Steel Facility, Vineyard, Utah. #UTD 009 086 133. USS and AGDI September 12, 2019.
- Revised Addendum to the Letter Report of Findings for Characterization of Site Soils for Beneficial Re-use as SWMU Backfill-Area 1: Human Health Risk Evaluation. Former Geneva Steel Facility, Vineyard, Utah. #UTD 009 086 133. October 14, 2019, USS and AGDI.
- Letter Report of Findings (LROF) / Human Health Risk Evaluation (HHRE) for Characterization of Soils for Beneficial Re-use as SWMU Backfill: Area 5. Former Geneva Steel Facility, Vineyard, Utah. #UTD 009 086 133. USS and AGDI, August 17, 2020.
- Revised Final RCRA Facility Investigation Task III, Part 4: Verification Investigation Work Plan. #UTD 009 086 133. USS, Geneva LLC, URS, and AECOM, 2017.
- Utah Department of Environmental Quality. Approval of Closed Hazardous Waste Impoundment Groundwater Treatment System Shut Down, Former Geneva Steel Facility, Vineyard, Utah, EPA #UTD 009086133. UDEQ, September 1, 2020.
- Spring 2021 Semi-Annual Groundwater Sampling Report, Prepared in Accordance with Approved Closure Plan and Post Closure Permit, for United

States Steel Corporation Hazardous Waste Surface Impoundments, Vineyard, Utah, EPA ID No. UTD 009 086 133. USS to UDEQ, July 2021.

• Groundwater Corrective Action Levels. Prepared to Conform with Post-Closure Permit Former Geneva Steel Facility, Vineyard, Utah. EPA ID No. UT 009086133. USS and AGDI, March 18, 2018.

# EXHIBIT A

# MAP, FORMER CLOSED HAZARDOUS WASTE IMPOUNDMENT SITE MANAGEMENT PLAN AREA AND GROUNDWATER MANAGEMENT AREA Former Geneva Steel Facility, Vineyard, Utah (URS, November 2021)



## <u>EXHIBIT B</u> BOUNDARY DESCRIPTION FORMER CLOSED HAZARDOUS WASTE IMPOUNDMENT SITE MANAGEMENT AREA

A PARCEL OF LAND LOCATED IN THE NORTHEAST QUARTER OF THE ŠOUTHEAST QUARTER OF SECTION 5, TOWNSHIP 6 SOUTH, RANGE 2 EAST, SLB&M, VINEYARD, UTAH SAID PROPERTY BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE EAST QUARTER CORNER OF SAID SECTION 5; THENCE WEST A DISTANCE OF 1554.96 FEET; THENCE SOUTH A DISTANCE OF 256.13 FEET TO THE REAL POINT OF BEGINNING;

THENCE S.00°20'45"E. A DISTANCE OF 434.67 FEET; THENCE S.55°48'02"W. A DISTANCE OF 308.75 FEET; THENCE WEST A DISTANCE OF 886.00 FEET; THENCE N.00°00'59"W. A DISTANCE OF 608.20 FEET; THENCE EAST A DISTANCE OF 1138.91 FEET TO THE POINT OF BEGINNING.

CONTAINING 15.42 ACRES OF LAND.

## <u>EXHIBIT C</u> BOUNDARY DESCRIPTION FORMER CLOSED HAZARDOUS WASTE IMPOUNDMENT GROUNDWATER MANAGEMENT AREA

A PARCEL OF LAND LOCATED IN THE NORTHEAST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 5, TOWNSHIP 6 SOUTH, RANGE 2 EAST, SLB&M, VINEYARD, UTAH SAID PROPERTY BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE EAST QUARTER CORNER OF SAID SECTION 5; THENCE WEST A DISTANCE OF 1702.50 FEET; THENCE SOUTH A DISTANCE OF 256.13 FEET TO THE REAL POINT OF BEGINNING;

THENCE S.35°43'59"E. A DISTANCE OF 254.76 FEET; THENCE S.00°20'45"E. A DISTANCE OF 201.85 FEET; THENCE S.71°49'56"W. A DISTANCE OF 339.28 FEET; THENCE WEST A DISTANCE OF 576.42 FEET; THENCE N.23°03'49"W. A DISTANCE OF 197.17 FEET; THENCE N.19°08'54"E. A DISTANCE OF 222.72 FEET; THENCE EAST A DISTANCE OF 282.21 FEET; THENCE N.64°43'26"E. A DISTANCE 287.23 FEET; THENCE EAST A DISTANCE 211.03 FEET TO THE POINT OF BEGINNING. CONTAINING 9.07 ACRES OF LAND