



E² Inc. Situation Assessment
City of Social Circle, Georgia: Cannon Road Drum Site
May 2007

EPA Region 4
Superfund Redevelopment Initiative

funded by
United States Environmental Protection Agency

prepared for
The City of Social Circle
Social Circle, Georgia

E² Inc. Situation Assessment

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I. Situation Assessment Overview

EPA's primary responsibility at Superfund sites is to ensure the protection of human health and the environment. EPA's cleanup programs have also set a national goal of returning formerly contaminated sites to long-term, sustainable, and productive use. By engaging local stakeholders in a collaborative decision-making process about a site's future use, EPA can help ensure the long-term effectiveness and permanence of site remedies. The Superfund Redevelopment Initiative (SRI) was created by EPA in 1999 to help communities and stakeholders in their efforts to return environmentally impaired sites to beneficial use. SRI provides a range of tools and information resources for both EPA staff and stakeholders interested in site reuse.

In February 2007, EPA Region 4 contacted SRI regarding an opportunity to assess future land use at the Cannon Road Drum site and incorporate these considerations as part of the implementation of the site's time-critical removal action. SRI assigned its contractor (E² Inc.) to gather information, interview site stakeholders, and conduct a site and community visit.

SRI-funded reuse planning activities must inform planned or ongoing response activities, address future use implications generated by waste left in place at sites, or address site stigma or reuse obstacles inadvertently created by EPA activities. During the site visit EPA staff indicated that it would likely not be possible for future use considerations to inform ongoing response activities at the site, due to the rapid pace of the time-critical removal action, which is scheduled for completion in May/June 2007. Since other conditions necessary for ongoing SRI support were also not met, the contractor produced a summary of activities that had been undertaken and proposed other approaches for providing the community with information that may be useful in supporting the future use of the site.

In terms of available tools and resources, the Superfund Redevelopment Initiative's website, at www.epa.gov/superfund/programs/recycle/index.htm, provides a range of tools to support community efforts to implement reuse projects and programs. EPA Region 4 also has several tools available that could help support the site's return to appropriate and beneficial uses. These tools include comfort letters and a Prospective Purchase Inquiry (PPI) process, which can provide prospective purchasers of Superfund sites with information on the site's current status, remedy compatibility, and liability and lien considerations to facilitate the responsible revitalization of contaminated property. Interested parties should contact Regional Superfund Redevelopment Coordinator Jon Bornholm at (404) 562-8820 or bornholm.jon@epamail.epa.gov for more information.

This situation assessment report provides a summary of site and community information that can inform the City of Social Circle and other local stakeholders' ongoing planning activities for the reuse of the Cannon Road Drum site. Based on the situation assessment's information gathering, the Cannon Road Drum site's reasonably anticipated future land use(s) could include commercial, industrial, residential, and/or public land uses. The site is located in a community that is experiencing rapid residential growth, the site property's owner is interested in transferring ownership of the property, and developers and the City of Social Circle have expressed interest in potential future land use opportunities at the site.

II. Situation Assessment Introduction

EPA Contractor E² Inc. conducted a situation assessment in February and March 2007 to gather future land use information to inform EPA Region 4 and community planning efforts to ensure the protectiveness of human health and the environment at the Cannon Road Drum site.

The situation assessment was conducted following the information collection guidelines outlined in EPA's 2001 Reuse Assessment Guidance (OSWER 9355.7-06P).¹ Information gathered and reviewed included local stakeholders, site features and environmental considerations, site ownership, land use considerations and environmental regulations, community input, public initiatives, and likely future uses. In addition, the situation assessment incorporated broad community information, presented in the second section of the document below, which highlights relevant economic and demographic trends relevant to the site's future use.

Activities completed as part of the situation assessment include:

- conference calls with EPA On-Scene Coordinator (OSC) Jose Negron, Social Circle Mayor Jim Burgess and City Manager Doug White, and site owner Bud Carter;
- information gathering and review of community planning materials and EPA and ATSDR site reports; and
- a February 28 – March 1, 2007 site visit and local government meeting.

This summary memo provides an overview of the key findings identified during the project's situation assessment.

Appendix A provides photographs of the Cannon Road Drum site, the site's access and surroundings, and land uses in the City of Social Circle.

¹ Reuse Assessments: A Tool to Implement the Superfund Land Use Directive (OSWER 9355.7-06P, 2001): www.epa.gov/oerrpage/superfund/programs/recycle/pdf/reusefinal.pdf

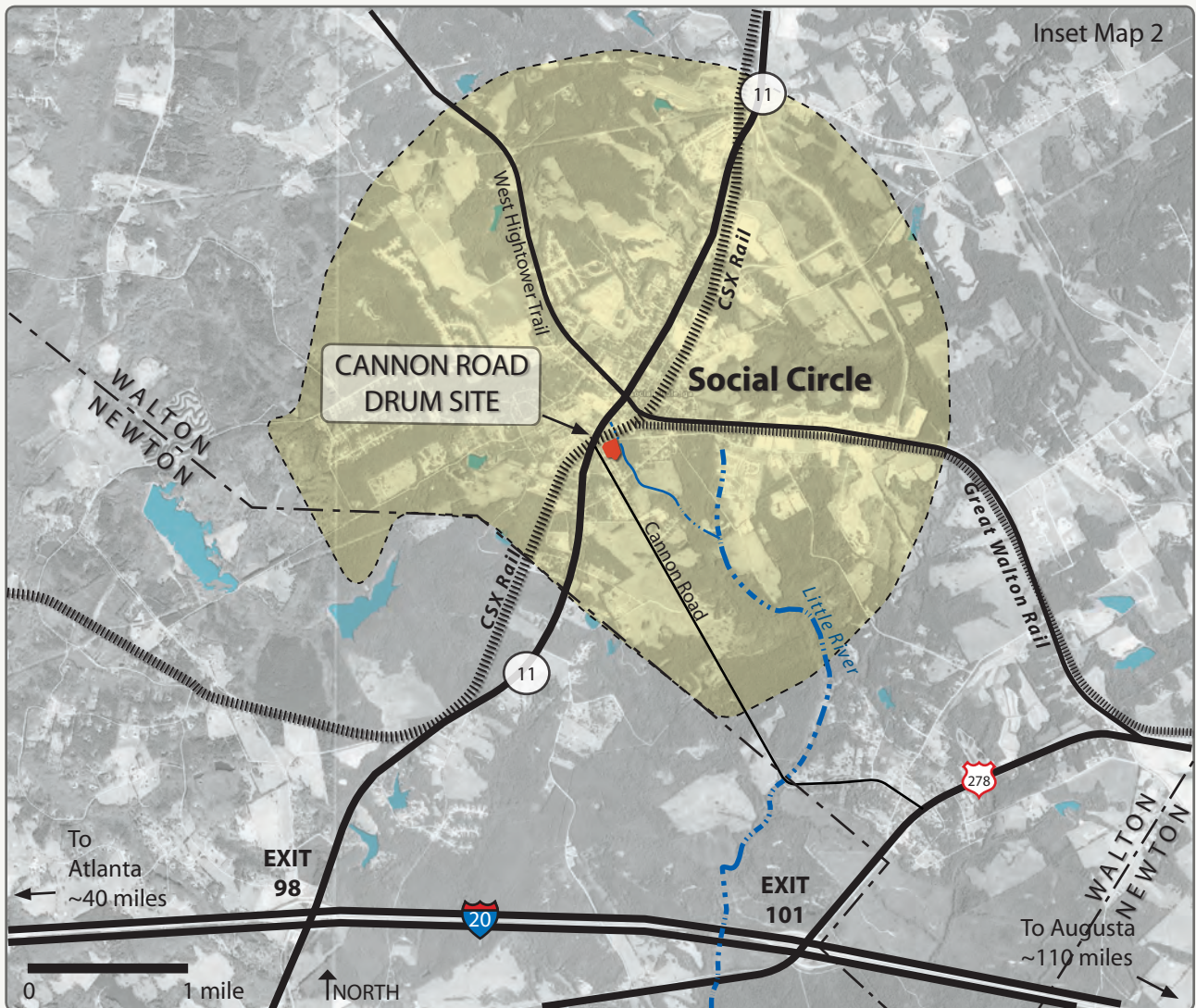
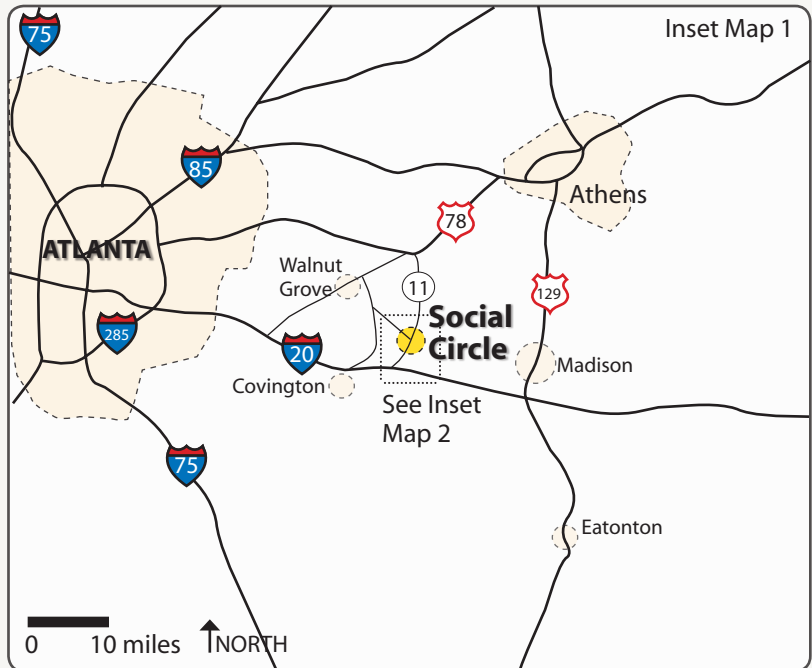
III. Situation Assessment Information Summary

A. Community Introduction

Information in this section was gathered from the U.S. Census Bureau, stakeholder interviews, and Walton County's 2003 *Comprehensive Plan*.

- The City of Social Circle (pop. 3,379) is located in Walton County (pop. 60,687) in north central Georgia, approximately 40 miles east of Atlanta (see Location Map, p. 4). The county seat is Monroe. The City of Social Circle is located in the southern tip of Walton County, adjacent to and north of Interstate 20.
- In 2000, the county's population was 83 percent White, 14 percent African-American, two percent Hispanic, and one percent Asian. Walton County experienced comparatively high population growth rates in the last decade, with a 57 percent increase between 1990 and 2000, compared to a 26 percent increase statewide and a 12 percent increase nationwide. The City of Social Circle's population increased by 23 percent, from 2,755 to 3,379, during this period. According to Walton County's 2003 *Comprehensive Plan*, the area's population is expected to continue to grow at a sustained rate of 20 percent.
- Walton County and the City of Social Circle are localities in transition. While much of the county remains rural, the area's economy is no longer built around natural-resource based industries, which represented 37 percent of the county's employment as late as 1950. Since 1980, the area's manufacturing sector has also declined, while the construction, retail, and service sectors have grown rapidly.
- Today, most parts of the county are growing consistently and experiencing significant commercial and residential development. The area's growth is being driven by the eastward expansion of the Atlanta metropolitan area. Georgia Perimeter College is also developing a 100-acre campus in Social Circle, adjacent to Interstate 20, which will serve as the central location of the Atlanta-based college's six-campus educational system. The City of Social Circle has completed two major annexations that have added approximately 3,000 acres to the locality's land area.
- The City of Social Circle is currently working to develop the locality's first comprehensive plan and update the locality's zoning ordinance. The Cannon Road Dump site is currently zoned for industrial land uses. City officials anticipate that the draft plan will be developed by June 2007, with the plan and updated ordinance finalized by late Summer 2007.

CANNON ROAD DRUM SITE LOCATION: Social Circle, Walton County, Georgia



B. *Local Government and Community Concerns and Priorities*

Information in this section was gathered from interviews with representatives from the City of Social Circle and the March 2002 *Social Circle Mill Village Area Redevelopment Study*.

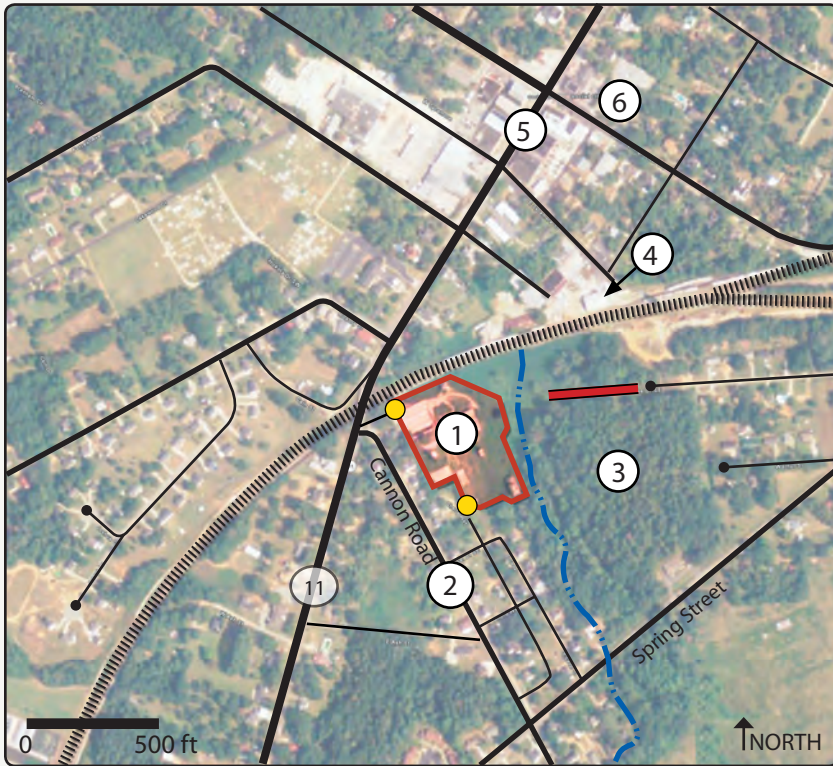
- The City of Social Circle's general priorities include public infrastructure and infrastructure improvements (water, sewer, and roadways), the provision of services to meet the needs of new residential developments, sustaining the city's downtown district, and an expanded tax base through new commercial and industrial development (see the Vicinity Map, p. 7).
- Within this context, City of Social Circle representatives indicated that the locality has both short- and long-term interest in the reuse of the Cannon Road Drum site. The city is interested in the possibility of locating public uses at the site, as well as supporting the site's private-sector redevelopment, which would generate increased tax revenues.
- In the long-term, the city would like to see land uses at the site that are compatible with the residential and commercial growth that is taking place in Social Circle. Potential public land uses identified to date could include a City Hall and/or post office, which would be relocated from downtown Social Circle. Private sector land uses could include residential land uses, a conference center, and commercial office, retail, and manufacturing land uses. According to city staff, the integration of multiple compatible land uses at the site could increase the likelihood of the site's redevelopment as well as help revitalize the surrounding neighborhood. Due to the site's proximity (a quarter-mile) to the city's downtown area, the site could serve as a southern anchor that would help sustain the district.
- The March 2002 *Social Circle Mill Village Area Redevelopment Study* conducted by consultants Robert and Company for the City of Social Circle determined that "there is strong potential demand for ownership and rental housing in the Social Circle market area" and outlined two reuse scenarios. The first scenario focused on the site property's residential redevelopment with a mixture of ownership and rental housing, which could require a significant, higher-cost remedial response, including off-site disposal of contaminated site soils. The scenario calls for 20 town homes and 40-60 multi-family units to be built on the site property.

The second scenario focused on the site property's reuse as a public park or green space, which could require a lower-cost remedial response, including on-site stabilization and capping of contaminated site soils. The *Redevelopment Study* assumes that the site property "does not have historic structures that may be adaptively reuse for housing or other uses. Any redevelopment of the site will require the removal of all building remains." The *Redevelopment Study* concludes that a three-phase residential redevelopment process at the site, excluding site property acquisition and additional environmental remediation costs, could cost approximately \$22.45 million.











The *Redevelopment Study*'s findings do not necessarily mean that there is strong *current* demand for the site's residential reuse. There are significant areas of undeveloped land in Social Circle and Walton County that are available for new residential development, and private parties have not yet stepped forward to remediate and reuse the site. In addition, the *Redevelopment Study* focuses on market information rather than site conditions. Certain types of residential uses could potentially be located at the site with a minimal remedial response, while some public park land uses could require a significant remedial response. Additional detailed, site-specific information will need to be gathered to determine the feasibility and likelihood of locating particular land uses at the site.

- The Cannon Road Drum site is located in the historical Mill Village district and the City of Social Circle recognizes that the cotton mill's remaining structures and equipment are an important part of the community's history and heritage. The city is interested in recognizing and incorporating the cotton mill's history as part of any site redevelopment plans.
- According to EPA site staff, the Cannon Road Drum site maintains a low profile in the community. Neighborhood residents adjacent to the site have expressed interest in the site's remediation as well as future use opportunities at the site.

CANNON ROAD DRUM SITE: Surroundings, Land Uses, and Ownership



KEY

-  Cannon Road Drum Site
-  Historic 'Mill Village' Neighborhood
-  Wooded Lot
-  Historic Rail Depot
-  Downtown Social Circle
-  Social Circle City Hall
-  Creek
-  CSX Rail
-  Powerline Corridor
-  Site Access Point



LAND USES

-  Industrial Uses
-  Commercial Uses
-  Residential Uses
-  Community Uses
-  Agricultural Uses

LAND OWNERS

-  Carter Jackson, Inc. (3.84 acres)
-  CSX Railroad
-  Social Circle Spring (6.38 acres)
-  Great Walton Rail (10 acres)
-  Residential Owners (acres vary)

C. Site Contamination and Remediation

Information in this section was gathered from interviews with EPA site staff, the 2001 *ATSDR Health Consultation Report*, the 2002 *Targeted Brownfields Assessment Report*, and the March 2002 *Social Circle Mill Village Area Redevelopment Study*.

- The Cannon Road Drum site is a former cotton mill facility in Social Circle, Georgia that operated from 1901 until 1982. The mill, which employed 225 employees at its peak, produced large cotton sheets made of 35 percent cotton and 65 percent polyester. A fire in 1994 destroyed over half of main mill building. The mill's operations may have contaminated site soils with metals (arsenic and thallium) and polynuclear aromatic hydrocarbons (PAHs).
- Response activities at the site in 1990, 2001-2002, and 2007 included soil and groundwater sampling. A removal action in 1990 addressed a PCB spill near the site's power station building. The ongoing time-critical removal action at the site in 2007 is addressing hazardous substances stored in containers on-site. These containers are currently being sorted and processed for off-site disposal, with the completion of the time-critical removal action anticipated by May/June 2007. Soil contamination from the mill's operations will require additional investigation and has not been addressed by response activities to date.
- In 1990, approximately 585 gallons of polychlorinated biphenyl (PCB)-contaminated oil were spilled near the power station building. An unknown volume of soil was removed to a depth where no visibly oil-stained soil was apparent, in accordance with EPA's Spill Cleanup Policy. In addition to contaminated soil removal, a one-foot buffer of soil from around the perimeter of the spill area was removed.
- In 1994, over half of the main mill building burned down in a fire. This area of the site still contains building debris. It is uncertain whether the remnant main mill building is structurally sound enough to support adaptive reuse.
- In 2001-2002, two site assessments were completed: an ATSDR Health Consultation and a Targeted Brownfields Assessment conducted by the US Army Corps of Engineers for EPA Region 4.
 - The 2001 *ATSDR Health Consultation Report* evaluated potential on-site risks to human health and safety, concluding that "currently no people are being exposed to contaminated on-site soil." However, "the cotton mill site poses a future public health hazard for people on the site if they are exposed to contaminated soil and receive the daily estimated oral doses of arsenic, PCBs, and benzo(a)pyrene over a prolonged time period. The exposure scenarios are conservative, but demonstrate a need to address the contamination prior to developing the site." The report recommended that background samples of arsenic and thallium be collected to determine if the levels found on-site are naturally occurring. The report also recommended the expansion of PCB soil sampling to determine the extent of its presence across the entire site.
 - The 2002 *Targeted Brownfields Assessment Report* evaluated potential on-site risks to human health and safety, particularly if the site were to be redeveloped for commercial or high-density residential use. The study targeted site-wide surface soil contamination levels as well as contamination of the surficial aquifer through the installation of four ground-water monitoring wells. The sampling plan excluded sampling of the building footprints and building debris. Soil samples were analyzed for concentrations of arsenic, PCBs, asbestos, chlorinated pesticides, semi-volatile organic compounds (SVOCs), and

volatile organic compounds (VOCs.) Ground-water samples were analyzed for chlorinated pesticides, SVOCs, and VOCs.

- The Targeted Brownfields Assessment concluded that site soils contain several contaminants, particularly arsenic, PCBs, and polycyclic aromatic hydrocarbons (PAHs) that are scattered widely across the site, with some at concentrations that pose a risk to human health. There is no groundwater contamination at the site. The report recommends that further investigations are needed before development of the site takes place -- to understand the vertical extent of the known soil contamination, including potential site-wide PCB contamination. Background sampling of arsenic was also recommended to determine naturally occurring arsenic levels.
- The 2002 *Redevelopment Study* conducted by consultants Robert and Company for the City of Social Circle reiterated that the findings from the two site assessments identified soil contamination levels that restrict the site property's development potential, requiring additional remediation. Remedial options proposed by the *Redevelopment Study* include the off-site disposal of contaminated soils, which the study indicates could be a more expensive remediation option but could enable the site to be reused for residential, commercial, or industrial uses. The report states that on-site stabilization and capping of contaminated site soils could be a lower cost remedial option that would enable the site to be reused as a park or undeveloped green space. Additional detailed, site-specific information will need to be gathered to determine the feasibility and likelihood of locating particular land uses at the site.
- Since 1982, the site has been leased to several tenants. The most recent leasee used the site as a storage facility for several thousand containers of mixed hazardous substances, primarily procured from the Department of Defense. EPA's Emergency Response Team began a time-critical removal action in December 2006 to address the removal of the abandoned containers. Activities of the on-going cleanup include segregation, consolidation, and removal of the waste materials. No further EPA activities are planned following completion of the time-critical removal action, which will be completed by Spring/Summer 2007.
- EPA site staff indicated that it not likely that institutional controls will need to be implemented at the site, given that the waste containers of concern are being disposed of off-site. Institutional controls are administrative and legal tools used to maintain protection of human health and the environment.²
- There are also materials remaining on-site – primarily lead-based paint and asbestos within the remaining mill buildings – that will not be addressed by EPA's Emergency Response Team. These materials will likely require further attention as planning for the site's property's redevelopment moves forward.

² Institutional controls (ICs) are non-engineered instruments for sites where waste has been left in place that help to minimize the potential for human exposure to contamination and protect the integrity of a remedy. ICs work by limiting land or resource use by providing information that helps modify or guide human behavior at the site. Examples of ICs include zoning restrictions, building or excavation permits, well drilling prohibitions, and easements and covenants.

D. Site Characteristics and Surrounding Land Uses

Information in this section was gathered from the site reports referenced in previous sections, as well as from interviews with local stakeholders and from the February 28 – March 1, 2007 site visit and local government meeting.

- The 3.84-acre Cannon Road Drum site rests on the side of a gently sloping ridge that runs from the northwest to the southeast. On-site structures serve as retaining walls, creating a terraced, stepped site that extends toward a small ravine located east of the site (see the Site Characteristics Map, p. 11).
- The former cotton mill facility was comprised of a main mill building, a three-story, 60,000 square foot structure, that housed a machine shop and areas for cotton sheet production activities that may have included weaving, bailing, carding, roving, spinning, spooling, and cleaning. Other structures on-site include storage buildings, large and small-scale sheds, a water tower, and a cooling and power station building. Primary building materials include brick, wood, steel, tin, and glass. In the event of a fire, water was pumped from a cistern located in the northeastern area of the site. The cistern, approximately twenty feet wide, is estimated to be approximately sixty feet deep. Cotton mill operations were steam powered through lines insulated with asbestos. While most of the lines have been removed, some of the asbestos may remain on-site.
- Site vegetation consists primarily of invasive exotic species, including kudzu and Japanese honeysuckle. These invasive species have begun to cover several of the buildings and are beginning to degrade site building materials. The plants also obscure views of site buildings in the summer months. Other vegetation around the site's edges includes middle Georgia upland pine forest, grasses, and wetland plants.
- Surface water runoff from the site flows eastward and to the northeast towards the bottom of the adjacent ravine where a small stream runs northwest-southeast, parallel to the site's eastern boundary. One or more artesian wells are located in the ravine. The cistern, located in the site's northeastern area, may be fed by one of the artesian springs.
- The site is currently fenced.
- The site is located approximately a quarter-mile south of downtown Social Circle, Walton County Georgia. The site, located off of Cannon Road, is located one block from State Highway 11. The site is bound to the north by the CSX railroad line, east of the South Cherokee Street Bridge, and to the west and south by a residential neighborhood with historic mill homes (see Surrounding Land Uses and Ownership Map, p. 7.) Approximately seventeen acres, consisting of wooded and wetland areas and a power line corridor, are located adjacent to the site's eastern boundary. According to Social Circle Mayor Jim Burgess, Social Circle Spring and Great Walton Rail own this acreage and no development plans have been proposed for these properties.
- The city is installing a new sewer line in Spring 2007, which extends northwest-southeast through the middle of the site. The sewer line will provide sewer service to residential areas located south of the site.

CANNON ROAD DRUM SITE: Existing Site Characteristics



AERIAL MAP KEY

- ▬ Cannon Road Drum Site Boundary
- Parcel Boundary
- Chainlink Fence
- Site Gate / Access Point
- Gravel Road
- Paved Entry Road
- Covered Walkway / Porch
- Sewer Line Easement
- Trees and Shrubs
- CSX Rail
- Creek
- Existing Building
- Former Cotton Mill Building Footprint
- Water Tank
- Cistern

SITE STRUCTURES KEY

- Residential Structure (Wood, Metal)
- Former Cotton Mill Main Building (Brick, Wood, Steel, Metal, Concrete)
- Cistern (Concrete)
- Former Cotton Mill Storage Buildings (Brick, Steel, Concrete, Wood)
- Footprint of Former Cotton Mill Building with one remnant building section (brick, concrete, metal)
- Power Station (Brick, Wood, Metal, Concrete)
- Water Tower (Metal)
- Pole Shed (Sheet Metal, Wood Poles)
- Shed (Brick, Metal, Concrete, Wood)

E. Site Ownership and Potentially Responsible Parties

Information in this section was gathered from interviews with site owner Bud Carter and Carter family associate Everett Royal, representatives from the City of Social Circle, and from the February 28 – March 1, 2007 site visit and local government meeting.

- The Cannon Road Drum site has been owned by Bud Carter of Augusta, Georgia for approximately 15 years. The hazardous substances at the site addressed by the time-critical removal action were bought from the Department of Defense and placed there by a site leasee, whom EPA has not publicly identified. All three parties – Bud Carter, the site leasee, and the Department of Defense – have been identified as potentially responsible parties that could be required by EPA to fund the site’s anticipated \$500,000 cleanup costs. The Department of Defense has indicated its willingness to coordinate with EPA during cost recovery activities; EPA has not yet determined cleanup cost shares or which parties will be responsible for the site’s cleanup costs.
- The site includes one 3.84-acre tax parcel.
- Site owner Bud Carter indicated that he is not interested in developing the site property and would like to sell the property to any interested party, including private sector developers or the City of Social Circle. Mr. Carter indicated that he has a good working relationship with Social Circle Mayor Jim Burgess and City Manager Doug White, and would like any future use(s) at the property to benefit the local community.
- Several private developers have expressed interest in the Cannon Road Drum site. Mayor Jim Burgess has been in contact with a developer specializing in the residential redevelopment and adaptive reuse of former industrial facilities. The developer is currently working on the adaptive reuse of another former mill located in an adjacent community. A development group based in Germany has also contacted the locality to express initial interest in the site’s redevelopment.

Mr. Everett Royal, a friend of the Carter family with development experience in the region, attended the March 1 site meeting in Social Circle. Mr. Everett expressed interest in locating uses at the site that would benefit the local community and attract visitors to Social Circle. In particular, Mr. Everett described his experience developing a multi-use conference center, hotel, and commercial retail shopping area in Madison, Georgia, which is located approximately 22 miles east of Social Circle. Mr. Everett indicated that the site’s history and remaining buildings and equipment could be incorporated as an important part of future land uses at the site property.

- The Cannon Road Drum site property has not been recently appraised; Social Circle Mayor Jim Burgess estimated that the site property could be worth approximately \$2-3 million, assuming that the site is cleaned up and available for a range of land uses, including residential uses.

IV. Situation Assessment Findings: Key Future Land Use Considerations

- **Based on the situation assessment's information gathering, the Cannon Road Drum site property's reasonably anticipated future land use(s) could include commercial, industrial, residential, and/or public land uses.** The site is located in a community that is experiencing rapid residential and consistent industrial and commercial growth, the site property's owner is interested in transferring ownership of the property, and developers and the City of Social Circle have expressed interest in potential future land use opportunities at the site.
- **The City of Social Circle is a small locality with significant experience partnering with regional organizations and state and federal agencies to coordinate a range of grants to help address community priorities.** Agency resources provided to date include grants through USDA's Rural Development program, the U.S. Department of Transportation's TEA-21 resources, the U.S. Economic Development Administration, the One Georgia Foundation, and the Georgia Environmental Facilities Authority. The City of Social Circle will have an important support or lead role in any redevelopment activities at the site.
- **The Cannon Road Drum site property offers several advantages that could help spur interest in the future use of the property.** The site property has access to existing infrastructure (water, sewer, electric) and is located adjacent to the City of Social Circle's downtown district and approximately three miles from the local Interstate 20 interchange. The site property is a valued community and historic resource that includes former mill buildings and equipment that could be adaptively reused or recycled.
- **Community interests in future use opportunities at the Cannon Drum Road site property face several significant physical challenges.** The site property has limited community visibility, indirect road access, varied terrain, and is located in an older residential neighborhood. Following completion of EPA's removal activities at the site, significant amounts of debris and heavy equipment will remain on-site; several buildings also contain uncharacterized amounts of lead paint and asbestos. Finally, the Targeted Brownfields Assessment conducted at the site in May 1992 indicated that the potential for human exposure to metals, PCBs, and PAHs in site soils would need to be addressed if any non-industrial land uses were planned for the site property.
- **The status and cleanup cost responsibilities of the site's potentially responsible parties will significantly impact the site property's availability for future use(s).** EPA has indicated that the status and cleanup cost responsibilities of the site's three potentially responsible parties will be clarified by Summer 2007. If site cleanup costs are not completely covered by the site's potentially responsible parties, EPA may need to place a lien on the property for cost recovery, which could limit redevelopment interest.
- **EPA Region 4 has tools available to assist site stakeholders and address the site's characteristics and potential lien considerations.** If EPA determines that a lien – including a windfall lien, given the site property's potential market value – needs to be placed on the property for cost recovery, EPA Region 4's Prospective Purchase Inquiry (PPI) process can provide prospective purchasers of Superfund sites with comfort letters and information on the site's current status, remedy compatibility, and liability and lien considerations to facilitate the responsible revitalization of contaminated property.³ Interested parties should contact Land Revitalization Legal Coordinator Jon Bornholm at (404) 562-8820 or

³ A CERCLA §107(r) windfall lien is a CERCLA statutory lien on a property for the increase in the fair market value of that property attributable to EPA's cleanup efforts. The windfall lien is limited to the lesser of EPA's unrecovered response costs or the increase in fair market value attributable to EPA's cleanup. For more information, please reference: www.epa.gov/compliance/resources/policies/cleanup/superfund/interim-windfall-lien-faq.pdf

bornholm.jon@epamail.epa.gov for more information. The Superfund Redevelopment Initiative's website, at www.epa.gov/superfund/programs/recycle/index.htm, also provides a range of tools to support community efforts to implement reuse projects and programs.

- **Phasing in new land uses over time at the site property could provide a way for new land users to harness site reuse opportunities in the short-term, while considerations like site ownership and cleanup cost responsibilities are addressed.** Shorter-term site reuse opportunities could include walking trails and historical and educational resources that recognize the cotton mill's importance as part of the community's industrial and economic heritage, the adaptive reuse of existing buildings for storage and other uses, and materials recycling.
- **Given the potential reuse opportunities and challenges faced by the Cannon Drum Road site property, future use planning for the site property should include surrounding properties, infrastructure, and the City of Social Circle's downtown district.** The site property's surroundings provide potential opportunities to improve access to the property from surrounding neighborhoods, roadways, and downtown Social Circle, as well as linking the cotton mill's historical resources with the surrounding Mill Village historical district.

Views of the Former Social Circle Cotton Mill, Yesterday and Today



Eastern View of the Social Circle Cotton Mill, 1940s
From *Vanishing Georgia*, Georgia Division of Archives and History, Office of the Secretary of State.



Eastern View of the Former Social Circle Cotton Mill, March 2007



View of the Former Social Circle Cotton Mill and CSX Rail Line, Taken from the Historic Train Depot Located Northeast of the Site

Exterior Photographs of Former Storage Buildings A, B, and C (See *Site Characteristics Map* for Building Locations)



View of Buildings A, B, and C (on left)



View from Covered Walkway, Looking into the Area Between Buildings B and C



View of Vegetation Growing in between Buildings B and C



Doorway into Basement of Storage Buildings A, B, and C



View of Covered Walkway / Concrete Porch Adjacent to Buildings A, B, and C

Interior Photographs of Former Storage Buildings A, B, and C



View of Building C's Interior, Looking Towards the Back of the Building



View of Building B's Interior, Looking Towards the Entry Way



View of Wood Ceiling and Roof Damage in Building A



View of Wood Ceiling and Florescent Light Fixture in Building A

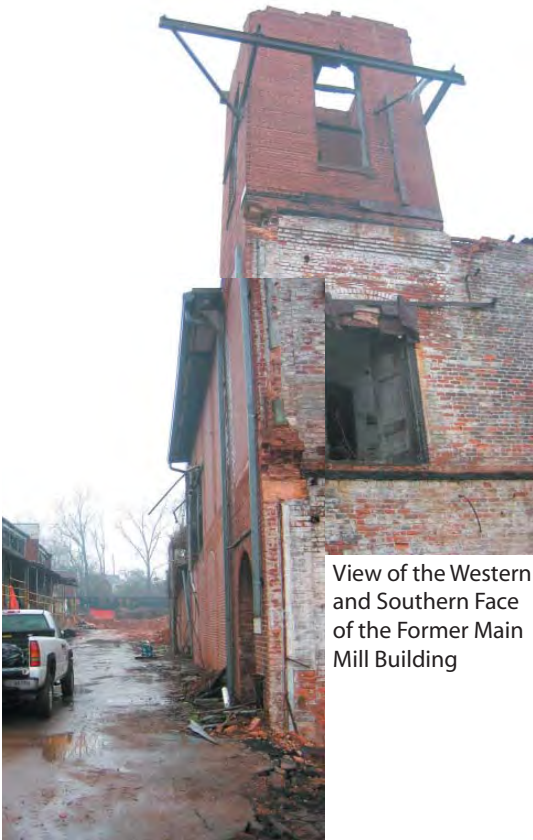


View of Building A's Interior, Looking Towards the Entry Way

Exterior Photographs of the Former Cotton Mill Main Building #2 (See Site Characteristics Map for Building Locations)



View of the Eastern Face of the Former Main Mill Building



View of the Western and Southern Face of the Former Main Mill Building



View of the Southern Face of the Former Main Mill Building



View of the Eastern Face of the Former Main Mill Building



View of the Northern Face of the Former Main Mill Building

Interior Photographs of the Former Cotton Mill Main Building #2



View of Former Main Mill Building Interior



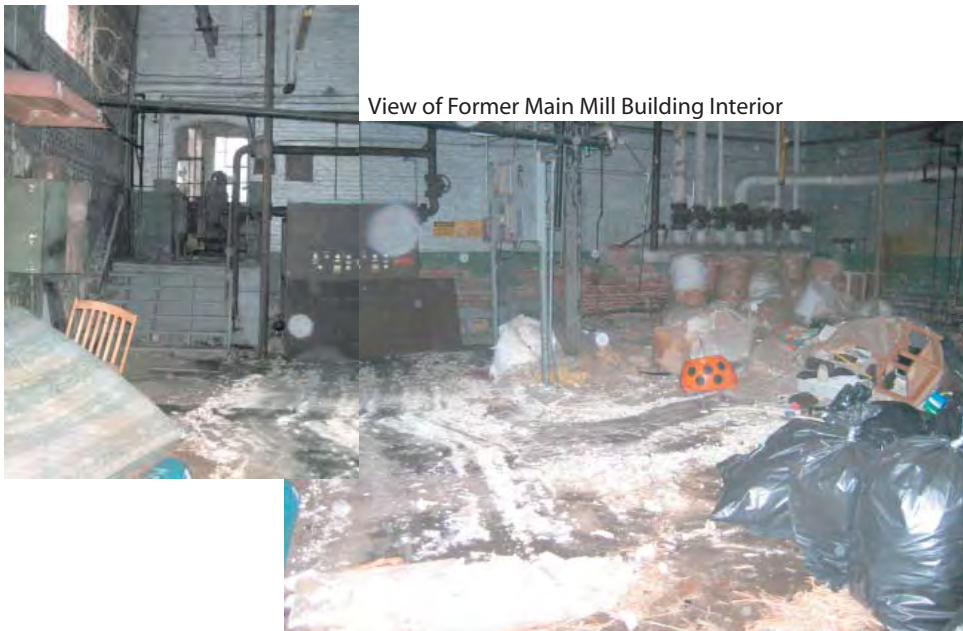
View of Former Main Mill Building Interior



Brick Column with Peeling Paint



View of Ceiling and Steel Post



View of Former Main Mill Building Interior

View of Former Main Mill Building Entry Way



Other Key Site Structures (See *Site Characteristics Map* for Building Locations)



View of Former Mill Building #2, Remnant Mill Building #3, Shed #4, and Edge of Pole Shed #5



View of Remnant Mill Building #3, Western Face



View of Water Tank, Brick Debris, Mill Equipment, and Remnant Mill Building #3



View of Remnant Mill Building #3, Eastern Face



View of Power Station #6



View of Remnant Mill Equipment and Brick Debris, Located in Former Mill Footprint Area



View of Brick Debris, Shed #4, (see photo below), and Pole Shed #5



View of Remnant Residential Structure



View of the Cistern



View of Shed #4

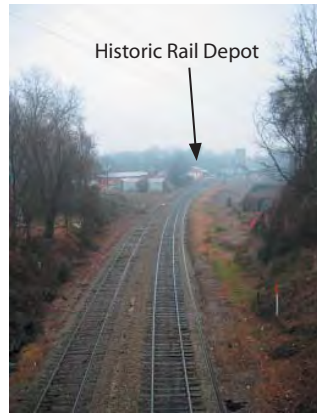
Site Access: Primary Entry Point off of Route 11



Site Surroundings



Route 11, Looking South towards I-20



View of the CSX Railway



View of a Passing Train



View of the Ravine and Wooded Lot Located East of the Site



Mill Village Residential Neighborhood Located West and South of the Site



Mill Village House



House Located East of the Site Along Jones Road

City of Social Circle Downtown and Surrounding Land Uses



Hightower Trail and Route 11 Intersection



Social Circle City Hall, 138 East Hightower Trail



Downtown Social Circle



Route 11, Looking South Towards Site and I-20

Industrial Land Uses



Distribution Center

Residential Land Uses



New Residential Development

Recreational Land Uses



South Walton Recreational Complex



Industrial Warehousing and Distribution Center



Farms and Larger Estates



Proposed Skate Park