



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
 61 FORSYTH STREET, SW
 ATLANTA, GA 30303

CASE #: OI-AT-2019-ADM-0007 **CROSS REFERENCE #:** COMP-2019-7
TITLE: CONCEALMENT OF ILLEGAL ACTIVITIES AT THE OLD GUN CLUB ROAD
 LANDFILL BY CITY OF ATLANTA OFFICIALS

INTERVIEWEE: (if applicable): N/A

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
FINAL SUMMARY REPORT

COMPLAINT: On September 19, 2018, Jerry Brow alleged the City of Atlanta operated an illegal landfill adjacent to his property from 1968 to 1974. Brow said the city has continued dumping debris on private property in the area, which it has refused to remove. Brow also said city officials are corruptly attempting to use eminent domain to take his property to conceal the existence of the landfill.

BACKGROUND: On September 19, 2018, SA (b) (6), (b) (7)(C) interviewed Jerry Brow regarding a report of alleged illegal dumping and possible corruption by the City of Atlanta. During the interview, Brow essentially stated City of Atlanta workers were dumping trash on his and others property, located outside the permitted area adjacent to the Gun Club Road Landfill. Brow also indicated he believes leeching from the unpermitted area was responsible for significant contamination in Proctor Creek. Brow said he has reported the incidents to both the City of Atlanta and the Georgia Environmental Division (EPD), both of which have refused to acknowledge the problem or take corrective actions. Brow opined publicity of the dumping and subsequent leeching of contaminants would hamper the city's redevelopment efforts and suggested a "cover-up" by the city and EPD. Brow also stated the EPA has funded assessments in the immediate area using a Brownfield Grant.

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INTERVIEWEE: N/A

DATE OF ACTIVITY:
 Various

DRAFTED DATE:
 02/08/2019

AGENT:
 SA
 (b) (6), (b) (7)(C)

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INVESTIGATIVE FINDINGS: SA (b) (6), (b) (7)(C) contacted (b) (6), (b) (7)(C) (b) (6), (b) (7)(C), EPA, Region 4, who located Brownfield Grant (b) (5) SA (b) (6), (b) (7)(C) performed a review of the grant and interviewed the (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) stated no sites adjacent to Brow's property received a Brownfield assessment during the project. (b) (6), (b) (7)(C) initially stated the City of Atlanta denied access to sites adjacent to Brow's property, but later clarified the city failed to respond to a request to access city parks for an infrastructure viability study. SA (b) (6), (b) (7)(C) found no projects on or adjacent to Brow's property that were funded by the EPA.

SA (b) (6), (b) (7)(C) conducted multiple interviews with Jerry Brow and reviewed documents Brow provided as proof of the alleged corruption. Brow owns multiple properties in the area, one of which is located between the unpermitted dumping area and a closed landfill. Brow believes if the city takes his property, they will be able to cover up the unpermitted landfill and related contamination forever. Brow is also concerned about health risks to the citizens in the area and the contamination to nearby Proctor Creek. Brow believes the city is concealing the contamination as it would have a negative effect on nearby property values slow development. Brow opines the city likely has made a deal with a local developer to assist in the concealment. Brow has active litigation against the city and is seeking compensation for the long-term dumping that has resulted in a loss of value for his land. Brow also provided evidence of the existence of the unpermitted landfill, which the city denies.

RECOMMENDATION: During multiple contacts with Brow, he made accusations of corruption and wrongdoing against "city officials" but could not provide a specific name or a specific act (bribery, kickback, etc) occurring due to the alleged cover-up. Also, no EPA funds were found to be expended in areas on or adjacent to Brow's property. There was no evidence to indicate that a crime occurred, so this investigation was not presented to the United States Department of Justice. No further investigative activities remain, and it is recommended this investigation be closed.

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