



October 10, 2011

Ms. Janet McDonald
REC Program
Inactive Hazardous Sites Branch (IHSB), Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Reference: Fourth Quarter 2011 Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project 22-13842E

Dear Ms. McDonald:

ECS Carolinas, LLP (ECS) has prepared the following Fourth Quarter 2011 Status Report for the above referenced site. This is the Eleventh Quarterly Status Report for this site since execution of the REC Administrative Agreement on December 10, 2008.

The Third Quarter 2011 Status Report prepared by ECS included a summary of our previous findings and requested the information be reviewed by IHSB in order to determine if industrial/commercial remediation standards would apply to this site. Additionally, ECS requested the IHSB to determine if a Vapor Intrusion Assessment would be necessary. It was brought to our attention that the Preliminary Soil Remediation Goals (PSRG) were updated shortly after our Third Quarter 2011 Status Report. Therefore, ECS reviewed the target compound concentrations and updated the PSRG table to determine the appropriate course of action.

Previous groundwater analysis revealed elevated concentrations of naphthalene, n-butylbenzene and sec-butylbenzene, as well as heavy metals in several locations exceeding Groundwater-Soil Remediation Goals or Health Based Soil Remediation Goals. Groundwater sample results indicated no volatile or semi-volatile organic compounds (VOCs or SVOCs) with the exception of a trace concentration of bis-phthalates in one sample location (laboratory artifact) and an area which appears to be related to a petroleum release. A number of metals have been detected in groundwater samples including chromium and lead exceeding Title 15, NCAC, 2L-Ground Water Quality Standards (2L Standards). However, after numerous sampling events, the previously identified metal concentrations dropped to below the 2L Standards and it is ECS's opinion that the elevated metal concentrations were likely due to groundwater turbidity.

According to the newly revised PSRG table (August 2011), the soil sample concentrations of naphthalene exceed the regulatory threshold value of 1.8 mg/Kg. Elevated concentrations of naphthalene are limited to the small area around boring S-31, on the southern portion of the site. Based on an email received by Ms. Hanna Assefa of NCDENR on August 2, 2011, she indicated that if high soil concentrations of naphthalene are limited to a small area and the direct contact remediation goals are met, vapor intrusion evaluation is not required. Additionally, elevated concentrations of n-butylbenzene and sec-butylbenzene were detected at SB-31. There is no specific PSRG standard for these compounds, and Ms. Assefa advised ECS that

Quarterly Status Report
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the PSRG standard for benzene should be substituted as the representative benchmark for the aforementioned benzene surrogates. If this is the case, soil sample concentrations of n-butylbenzene and sec-butylbenzene exceed the regulatory threshold value of 5.4 mg/Kg.

The semi-volatile target compounds appear to be limited to one boring location, out of 31 borings advanced on the site. Therefore, a Vapor Encroachment Screen (a.k.a Vapor Intrusion Assessment) does not appear to be a necessary action because there is no indication that VOCs exist anywhere else on the site. ECS recommends excavating the impacted area around boring S-31.

ECS recommends limiting soil abatement/removal action at the area around S-31. At the time of preparing the forthcoming Remedial Action Plan (RAP), ECS will provide further details for managing the abatement process.

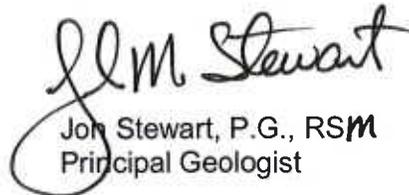
The Remedial Investigation Report is scheduled to be completed by the end of October, which would place completion of the remedial investigation within the three year requirement of execution of the Administrative Agreement. Based on this time frame, the work is in progress to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C.0302(h).

If you have any questions concerning this report or this project, please contact us at (910) 686-9114.

ECS CAROLINAS, LLP



Rudy A. Smithwock, P.G.
Senior Geologist



Jon Stewart, P.G., RSM
Principal Geologist

cc: Mr. Stephen Pike – Investors Trust Company
Ms. Kim Caulk

REMEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(b)(2)):

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Investors Trust as Trustee, by
Stephen E. Pike President
(Name of Remediating Party Official)

* [Signature]
(Signature of Remediating Party Official)

* 10/11/11
Date

North Carolina (Enter State)

Orange COUNTY

I, Patricia D. Unger, a Notary Public of said County and State, do hereby certify that Stephen E. Pike did personally appear and sign before me this day, produced proper identification in the form of Driver's License was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 11th day of October, 2011.

[Signature]
Notary Public (signature)

My commission expires: 05-28-2012



REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1)):

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

John M. Stewart
(Name of Registered Site Manager)

* J.M. Stewart
(Signature of Registered Site Manager)

* 10/12/11
Date

North Carolina (Enter State)

Chatham COUNTY

I, JONNA PETERS, a Notary Public of said County and State, do hereby certify that JOHN M. STEWART did personally appear and sign before me this day, produced proper identification in the form of DRIVERS LICENSE was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 12 day of October, 2011.

Jonna Peters
Notary Public (signature)

My commission expires: 3/24/12



Macdonald, Janet K

From: JStewart1 [JStewart1@ecslimited.com]
Sent: Thursday, October 13, 2011 2:23 PM
To: Macdonald, Janet K
Cc: RSmithwick; AConchas
Subject: RE: Fourth Quarter Report, Wrightsville Avenue, Wilmington, NONCD0002799

Categories: Uploaded to CARA

Janet,

Thanks, that's the way I interpreted the email, but we wanted to send you the data in the report just to make sure you agreed. We'll move forward with completing the RI.

Thanks,

John M. Stewart, P.G., CPG
Principal Geologist
ECS Carolinas, LLP 4811 Koger Boulevard, Greensboro, NC 27407
T: 336.856.7150
C: 336.880.9370
D: 336.478.1621 x 3022
F: 336.856.7160
www.ecslimited.com

Confidential/proprietary message/attachments. Delete message/attachments if not intended recipient -----Original Message-----

From: Macdonald, Janet K [<mailto:jkmacdonald@ncdenr.gov>]
Sent: Thursday, October 13, 2011 2:12 PM
To: JStewart1
Subject: RE: Fourth Quarter Report, Wrightsville Avenue, Wilmington, NONCD0002799

John,

According to our previous e-mails, Hanna ruled out the need for a vapor intrusion evaluation associated with the limited soil impacts. She recommended that you compare the groundwater concentrations with the screening tables on the website to verify that elevated vapors are not emanating from groundwater impacts. Based on your statement that VOCs or SVOCs are not present in groundwater, a VI evaluation should not be necessary at this site. But you will need to look at the data to verify.

Thanks,

Janet

Janet Macdonald
Phone: (919) 508-8446

****PLEASE NOTE NEW CONTACT INFO AS OF OCTOBER 24, 2011**** DIRECT PHONE NUMBER: (919) 707 8349;
ADDRESS: 217 West Jones Street, Raleigh, NC, 27603

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

-----Original Message-----

From: JStewart1 [<mailto:JStewart1@ecslimited.com>]
Sent: Wednesday, October 12, 2011 4:23 PM
To: Macdonald, Janet K
Cc: AConchas; RSmithwick
Subject: Fourth Quarter Report, Wrightsville Avenue, Wilmington,
NONCD0002799

Janet,

Please find attached the Fourth Quarter 2011 Report for the Wrightsville Avenue site in Wilmington. In the report, ECS is requesting a determination on whether a VI assessment is required or not. Please let me know if you have any questions.

Thanks,

John M. Stewart, P.G., CPG
Principal Geologist
ECS Carolinas, LLP 4811 Koger Boulevard, Greensboro, NC 27407
T: 336.856.7150
C: 336.880.9370
D: 336.478.1621 x 3022
F: 336.856.7160
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From: 09PRN203@ecslimited.com [<mailto:09PRN203@ecslimited.com>]
Sent: Wednesday, October 12, 2011 4:02 PM
To: JStewart1
Subject: Scanned from MFP07297142 10/12/2011 13:01

Scanned from MFP07297142

Date: 10/12/2011 13:01
Pages: 4
Resolution: 300x300 DPI
