

State of North Carolina
Department of Environment,
Health and Natural Resources
Regional Health Office

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
Leesha L. Fuller, Regional Manager



**DIVISION OF ENVIRONMENTAL
MANAGEMENT
GROUNDWATER SECTION**

June 20, 1995

CERTIFIED MAIL Z 117 593 915
RETURN RECEIPT REQUESTED

Exxon Company USA
ATTN: Mr. James F. Medlin
P.O. Box 30451
Charlotte, NC 28230

Subject: Exxon Company USA # 43998, 4701 W. Market St., Greensboro, Guilford
County, Groundwater Incident # 10001

Dear Mr. Medlin:

This office has reviewed the Comprehensive Site Assessment (CSA) prepared for Exxon by Delta Environmental Consultants, Inc. Before the CSA can be approved, the following items must be addressed:

- (1) The horizontal and vertical extent of soil contamination has not been determined. According to the Tank Excavation Report (received December 27, 1991) for the site, samples were taken from native soils after excavation of the tanks and product piping. Analyses of these soil samples showed TPH levels (by Method 5030) as high as 9000 ppm. The report also states that, "During the excavation process, it was determined that over excavation of this area was not feasible due to site geological characteristics." The remaining contaminated soils must be delineated. Because groundwater contamination has been confirmed, soil cleanup levels will be 10 ppm TPFH (for EPA method 5030), 40 ppm TPFH (for EPA method 3550) and 250 ppm TPFH (for EPA method 9071).
- (2) The extent of the dissolved contaminant plume has not been delineated to the south. For assistance in obtaining offsite access for the purpose of installing monitor wells, please contact Michael Zappia at the phone number listed below.

This list highlights areas that should be addressed; it is not intended to be all-inclusive.

Until the issues listed above can be resolved, acceptance by this office of the CSA is denied. Acceptance of the CAP is also denied. A revised CSA should be submitted within sixty (60) days of receipt of this letter. A revised Corrective Action Plan (CAP) should be submitted within ninety (90) days of receipt of this letter. See the current *Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater* for guidance on the requirements for Comprehensive Site Assessments and Corrective Action Plans. Excerpts from the *Guidelines* are enclosed for your review.

If you have any questions, you may contact Michael J. Zappia at (910) 373-3771.

Sincerely,

Sherri V. Knight

Sherri V. Knight
Groundwater Supervisor

Enclosures

cc: Guilford County Health Department
WSRO

Z 117 593 915



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PS Form 3800, March 1993

CSA & CAP reject / 4701 W. Market St.

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Exxon Company USA
ATTN: Mr. James F. Medlin
P.O. Box 30451
Charlotte, NC 28230

4a. Article Number
Z 117 593 915

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5. Signature (Addressee)

6. Signature (Agent)

PS Form 3811, November 1990 *U.S. GPO: 1991-287-066 **DOMESTIC RETURN RECEIPT**