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EXXON COMPANY, U.S.A.

POST OFFICE BOX 30451 • CHARLOTTE, NORTH CAROLINA 28230-0451 • (704) 529-4263

MARKETING DEPARTMENT
ENVIRONMENTAL ENGINEERING

J.F. (FRANK) MEDLIN
SENIOR STAFF ENGINEER

February 16, 1993

Re: Notice of Violation
Exxon R/S No. 4-3998
4701 West Market Street
Guilford County
Greensboro, North Carolina

Mr. Larry Coble
Regional Supervisor
Winston-Salem Regional Office
North Carolina Department of Environment,
Health and Natural Resources
Division of Environmental Management
8025 North Point Boulevard
Winston-Salem, North Carolina 27106

Dear Mr. Coble:

Your Notice of Violation (NOV) for the subject site was received at my office on January 22, 1993.

Exxon is working toward completing the Comprehensive Site Assessment (CSA) on or before March 19, 1993, as you requested. I have attached the 4th Quarter 1992 Status Report on the subject site as an update of the environmental investigation ongoing. There is at this time an offsite access concern, but Exxon's consultant, Delta Environmental Consultants, Inc., is working with the property owners. If a delay is seen, we will be in contact with your office. It is also understood from discussions with the adjacent property owners that another site at this intersection is having an underground storage tank problem. If any information is available at this time on the underground storage tank situation that may impact Exxon's CSA, please advise.

Exxon takes exception to the sixty (60) day submittal timing on the Corrective Action Plan (CAP). The CAP cannot be completed until your office accepts the CSA. Upon acceptance of the CSA, Exxon would like to discuss with you the remediation systems recommended as required by your CSA guidelines. Based on the foregoing, Exxon cannot commit to a sixty (60) day CAP timing on a CSA submittal.

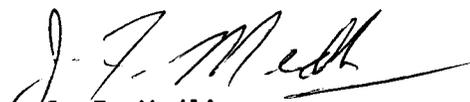


Mr. Larry Coble
February 16, 1993
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Please contact me at the letterhead address or call (704) 529-4263 on any questions or comments.

Sincerely,

FOR EXXON COMPANY, U.S.A.


J. F. Medlin

JFM:njl
Enclosure
0486N

c: Delta Environmental, Inc.
D. J. Bertoch
J. W. Gatlin



received

2/11/93

JAMES F. MEDLIN
ENVIRONMENTAL ENGINEERING
EXXON COMPANY, U.S.A
P.O. BOX 30451
CHARLOTTE NC 28230-0451

6701 Carmel Road
Suite 200
Charlotte, NC 28226-3901
705/541-9890
FAX: 704/543-4035

February 4, 1993

Exxon Company, USA
P.O. Box 30451
Charlotte, NC 28230-0451

Attention: Frank Medlin

Subject: Quarterly Status Report
Exxon RAS #4-3998
Greensboro, North Carolina
Delta Project No. 50-92-037.01

Dear Frank:

Enclosed is the Quarterly Status Report you requested for the Greensboro area site. This report contains general project information for the fourth quarter of 1992. The work proposed for the first quarter '93, is based on our December 17th discussion of the status of these projects (summarized below).

RAS#4-3998: 4 shallow wells on-site. All except 1 show significant BTEX levels. Some other Method 625 and 601 compounds were detected in two wells but their origin is not known. Need to evaluate off-site conditions to the south, east and north to complete CSA. Delta is currently seeking "Right of Entry" agreements for the adjacent properties, but to date, no agreements have been obtained. The owner of the property adjacent to MW-2 was adamant in denying permission to install any monitoring wells at his lot, but will provide data from existing wells. Recommend aquifer testing and quarterly sampling program until access to other properties is obtained.

If you need any additional information or any revisions are needed, feel free to contact me at (704) 541-9890.

Sincerely,

DELTA ENVIRONMENTAL CONSULTANTS, INC.


J. David Curlis, P.G.
Project Manager

cc: Luba L. Gross, Delta Environmental Consultants, Inc.

EXXON QUARTERLY REPORT

RAS Location #: 4-3998 Address: 4701 W. Market Street, Greensboro, NC

Consulting Co./Contact Person: Delta-Charlotte/David Curlis 50-92-037

Contract # for Invoicing: 92077663

Contract Expiration Date: 2-28-93

Regulatory ID Number: _____

WORK PERFORMED THIS QUARTER [Fourth - 1992]:

- Submitted Initial Investigation Report to Exxon.
- Attempted to obtain "Right of Entry" for the adjacent properties. The off-site access have not been procured yet.

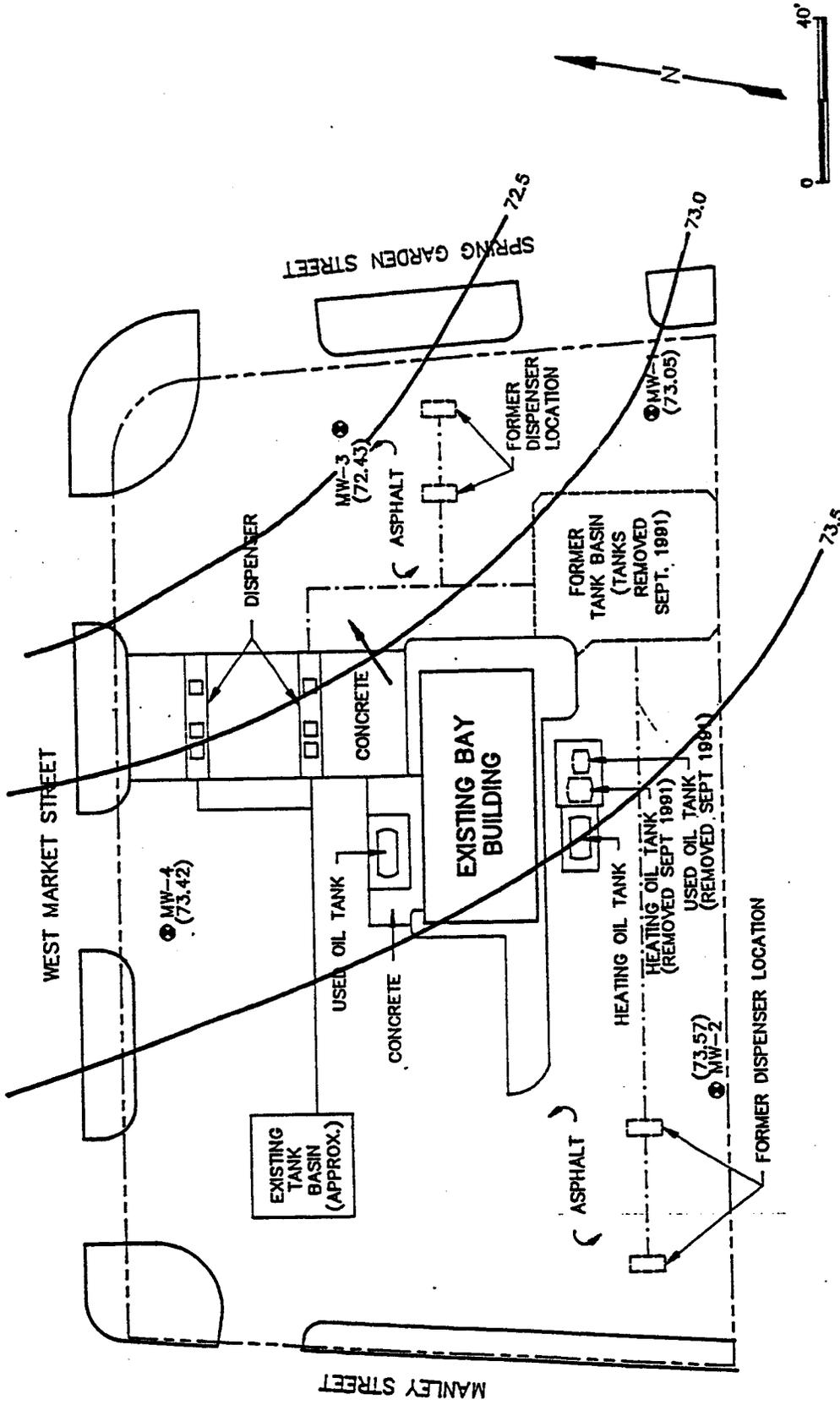
WORK PROPOSED FOR NEXT QUARTER [First - 1993]:

- Conduct aquifer testing.
- Conduct quarterly sampling program.
- Attempt to obtain "Right of Entry" for the adjacent properties.

Current Phase of Project:	<u>Additional Assessment</u>	(Phase I, Add'l Assmnt, RAP/CAP, Remed, etc)
Frequency of Sampling:	<u>Quarterly</u>	(Quarterly, etc)
Frequency of Monitoring:	<u>As Needed</u>	(Monthly, etc)
Is Liquid Phase Hydrocarbon present on-site:	<u>No</u>	(Yes/No)
Cumulative LPH recovered to date:	<u>N/A</u>	(gallons)
Amount of soil removed to date:	<u>None</u>	(cubic yards/tons)
Sensitive Receptors within a 1000' radius & their direction:	<u>None</u>	(Sewers, basements, water wells, etc)
Current remediation techniques:	<u>N/A</u>	(SVES, Pump & Treat, FP Removal, etc)
Permits for Discharge:	<u>N/A</u>	(NPDES, POTW, etc)

ATTACHED:

- Site diagram with groundwater flow direction superimposed.
- Chronologic listing by well of groundwater analytical results.
- Chronologic listing by well of gauging data.



 Delta Environmental Consultants, Inc. Charlotte, North Carolina 28226	CLIENT/LOCATION EXXON COMPANY, USA GREENSBORO, NC	
	DELTA PROJECT NO. 50-92-037	DESCRIPTION GROUND WATER CONTOUR MAP RAS #4-3998
DRAWN BY C. HAITHCOX	DATE 9-21-92	SCALE 1" = 40'
REVIEWED BY C. HAITHCOX	DATE 9-21-92	CWD NO. 037-SM

LEGEND:

- MONITORING WELL LOCATION
- EXISTING DISTRIBUTION LINE (APPROX LOCATION)
- - - FORMER DISTRIBUTION LINE (APPROX LOCATION) -- REMOVED SEPT 1991
- PROPERTY BOUNDARY
- (73.57) GROUND WATER ELEVATION (8/20/92)
- GROUND WATER FLOW DIRECTION

TABLE

WATER ANALYSES
EXXON SITE NO. 4-3998
WEST MARKET STREET
GREENSBORO, NORTH CAROLINA
DELTA PROJECT NO. 50-92-037.01

	<u>MW-1</u>	<u>MW-2</u>	<u>MW-3</u>	<u>MW-4</u>
<u>Date Sampled:</u>	08-20-92	08-20-92	08-20-92	08-20-92
<u>Compounds:</u>				
EPA 601				
1,2-Dichloroethane	<150	<80	400	<3
1,1,2,2-Tetrachloroethane	<50	40	110	<1
all other Method 601 compounds	BDL	BDL	BDL	BDL
EPA 602				
Benzene	5,000	1,400	11,000	<2
Toluene	35,000	4,900	41,000	<2
Ethylbenzene	3,900	1,600	4,800	<2
Xylenes	22,000	6,000	28,000	4
Total BTEX	65,900	13,900	84,800	4
MTBE	<500	<250	<500	<10
EPA 625				
Di-n-butylphthalate	---	15.9	---	---
Naphthalene	---	189	---	---
all other Method 625 compounds	---	BDL	---	---

Other Tentatively Identified Compounds - see Laboratory Report

Notes:

Results in micrograms per liter (ug/l)

BDL - Below Detection Limit

--- - No 625 analysis for this well; worst case well only

TABLE

WATER LEVEL MEASUREMENTS
EXXON SITE NO. 4-3998
WEST MARKET STREET
GREENSBORO, NORTH CAROLINA
DELTA PROJECT NO. 50-92-037.01

	<u>MW-1</u>	<u>MW-2</u>	<u>MW-3</u>	<u>MW-4</u>
Date measured:	08-20-92	08-20-92	08-20-92	08-20-92
Depth to Top of Screen (ft)	10.0	15.0	15.0	15.0
Depth to Ground Water (ft)	23.45	22.99	24.49	24.5
Top of Casing Elevation (ft)	96.50	96.56	96.92	97.92
Ground Water Elevation (ft)	73.05	73.57	72.43	73.42
Liquid Phase Hydrocarbon (ft)	—	—	—	—