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Fax

5900 Triangle Drive / Raleigh, NC 27613
Tel 919.786.1414 / Fax 919.786.1418
<http://www.mma1.com>

To: Sharon Cihak/Cindy Rintoul **From:** Drew Waggener

Fax: (336) 641-4812 **Pages:** 3

Phone: **Date:** 8/27/01

Re: Former Exxon 4-6602 & 4-3998 **CC:**

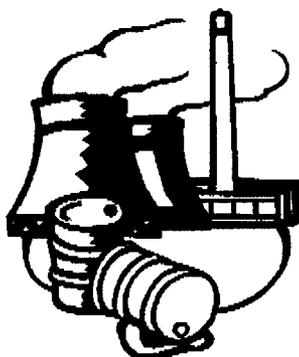
Urgent **For Review** **Please Comment** **Please Reply**

● **Comments:**

Following is an additional letter to highlight some of the key points in determining the RP status for the releases at the two referenced former Exxon sites.

Please call if you have any questions.

Drew Waggener



ENVIRONMENTAL SERVICES
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- **Air Permitting**
- **Emergency Spill Response and Cleanup**



August 27, 2001

Ms. Sharon C. Cihak
Guilford County Health Department
1100 E. Wendover Avenue
Greensboro, North Carolina 27405

Re: Former Exxon Sites #4-6602 and 4-3998
3701 High Point Road & 4701 High Point Road
Guilford County
MM&A Project No. YZ131 and YZ132

Dear Ms. Cihak:

As we have discussed, the impact identified at the two referenced sites during the recent UST closure activities were pre-existing conditions that were present and documented prior to Lee-Moore Oil Company's (LMOC) acquisition of the referenced sites from Exxon in 1999. Although soil impact at above regulatory guidelines was encountered during the recent UST Closure activities that may require additional investigation, these were not new areas of impact, but were anticipated based on the results of MM&A's investigations in 1999, prior to the acquisition. Currently, Exxon maintains the groundwater treatment systems at both locations and is performing additional investigation at the Former 4-3998 site to address the soil impact identified during the UST closure activities. We request consideration of these preexisting conditions in determining the responsible party for the impact at the sites.

Former Exxon 4-6602 - 3701 West Market Street

- Environmental investigations and remedial activities have been ongoing at the site since 1991. Exxon is recognized as the responsible party for the release(s).
- MM&A performed a Phase II investigation at the site in April 1999, prior to LMOC's acquisition of the site from Exxon, to establish a baseline of existing impact from the UST systems.
- Although most of the previous investigations and remedial activities have been associated with the release from the former UST system located in a different pit basin, MM&A's pre-acquisition investigation identified groundwater impact in the vicinity of the most current pit basin (MW's 11 and 12). Exxon has been sampling these new data points and submitting the results to NCDENR as part of ongoing monitoring activities.
- The recently removed UST's were installed in 1991.
- The site is ranked as a commercial/industrial site.
- The soil impact identified during the recent UST closure activities was limited to the area around Tank 1 and was below commercial/industrial standards.
- A groundwater remediation system, operated by Exxon, will continue to address the groundwater impact at the site.

5900 Triangle Drive / Raleigh, NC 27617 / Tel 919.786.1414 / Fax 919.786.1418

Web Site — <http://www.mma1.com> • E-mail — raleigh@mma1.com

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Former Exxon 4-3998 - 4701 High Point Road

- Environmental investigations, free product recovery and remedial activities have been ongoing at the site since the discovery of free product in 1985. Exxon is recognized as the responsible party for the release(s).
- The only area where gasoline impact was detected during the recent UST removal was under dispensers 3 and 4, which were located closest to High Point Road, on the north side of the site. Monitoring wells 3 and 9 are located adjacent to this area, which have historically contained concentrations of gasoline indicator compounds from the previously identified release, before the property transfer from Exxon to LMOC.
- MM&A performed a Phase II investigation at the site in April 1999, prior to LMOC's acquisition of the site from Exxon. This investigation included sampling of existing monitoring wells and soil sampling. The groundwater sample from preexisting MW-3, in the vicinity of the dispenser island where impact was discovered during the UST Closure activities, revealed petroleum impact above regulatory limits.
- Upon receipt of the recent UST Closure activity results, Exxon representatives are performing additional investigation around the former dispensers using the Risk Based analytical methods to determine if additional actions related to the soils are required. The soil samples were obtained on Tuesday, August 7, 2001 and the analytical results are pending.
- An air sparge/SVE system, operated by Exxon, will continue to address the groundwater impact at the site.

On behalf of LMOC, we respectfully request that NCDENR defer to the previous documented releases at the sites and Exxon's ongoing activities in addressing impact at the sites, for determination of responsible party status. If you have any questions or comments, please do not hesitate to call our office at 919-786-1414.

Sincerely,

MARSHALL MILLER & ASSOCIATES, INC.



Andrew Waggener
Assistant Vice President

cc: Bob Hood, Lee-Moore Oil Company
Frank Medlin, Exxon
Tom Lennon, Piedmont Industrial Services

