



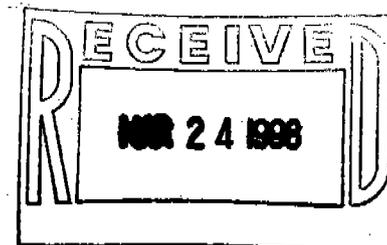
BPA Environmental & Engineering, Inc.

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March 23, 1998

Ms. Sharon Cihak
Guilford County Department of Public Health
Division of Environmental Health
1100 E. Wendover Ave.
Greensboro, NC 27405



Re: Site Closure Request
Harold Hall Property, 106 West Main Street, Jamestown, NC
Ground Water Incident No. 10002
Site Risk Low
BPA No. 0405.002

Dear Ms. Cihak:

Mrs. Martha Hall, power-of-attorney for Mr. Harold Hall, the property owner and responsible party, is interested in having the subject site closed as soon as possible. A Comprehensive Site Assessment for the site was submitted by Geonetics Corporation of Boone, NC, on October 3, 1994. Per paragraph (r) of the Risk Based Corrective Action Rules (NCAC 15A 2L Section .0115) (Rules) which went into effect January 2, 1998, the responsible party is obligated to notify the NC DENR of any factors that might affect the level of risk previously assigned to the site by the NC DENR. The NC DENR previously assigned this site as a Class E, or as classified under the new rules, a low risk site.

We compared the risk level criteria in paragraph (d) of the Rules with the existing field data to determine the current risk level of the site. None of the criteria for high risk sites applies to this site, however, one of the five criteria listed under the meaning of intermediate risk (paragraph (E)) pertains to this site. Analysis of ground water samples collected from MW-2 and MW-5 on September 8, 1994 detected lead concentrations of 90 ppb and 60 ppb respectively (Table 1). These concentrations are above the gross contamination level of 15 ppb for lead, which is equal to 50 percent of the solubility at 25 degrees Celsius. Monitoring well locations are shown in Figure 1.

The rules give the NC DENR the authority to reclassify intermediate risk sites to low risk sites if the NC DENR determines, based on site-specific conditions, that the discharge or release does not pose a significant threat to human health or the environment (2L .0115 paragraph (g)). We would like to present you with information at this time that shows that the release at this

site does not pose a significant threat to human health or the environment and that the site classification should remain low risk.

The site is located at the intersection of West Main Street and Oakdale Road in Jamestown, NC. The site is zoned B-1, General Business. The area adjacent to the site is also zoned B-1 (Figure 2). The businesses around the site consist of two stores, a dry cleaner, a vacant convenience store and former gas station, and undeveloped property. The area is therefore considered industrial/commercial. The site area is served by public water and Geonetics reported that there are no water wells or surface water receptors within 1,000 feet of the site. The area downgradient of the release also contains a railroad track with its associated right-of-way. Groundwater is located approximately eight to ten feet below land surface.

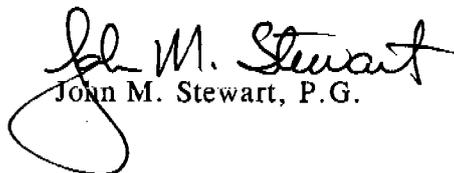
Soil contamination is present at the site in the areas of borings S-1 (141 ppm volatile total petroleum hydrocarbons (TPH) and 224 ppm semi-volatile TPH), and S-6a (258 ppm as oil and grease) above the soil action levels of 10 ppm, 40 ppm and 250 ppm, respectively (Table 2 and Figure 3). The oil and grease contamination in S-6a was only 8 ppm above the State's standard at 2 feet below the ground surface in 1992, and the TPH contamination in the area of S-1 was detected at 10 feet below the ground surface which is located in the "smear zone". We therefore believe that this soil contamination is a result of the shallow groundwater, and should therefore not be remediated. Additionally, these TPH levels are below the State's current TPH level of 12,264 ppm for commercial sites.

Based on this information, we do not believe the release at the Hall Property is a significant threat to humans or the environment. The source(s) of contamination has been removed, there are no pathways for the existing contaminated groundwater to impact receptors, the area is served by public water. Though the concentrations of lead are above the gross contaminant level, this level may not be realistically applicable, and we do not believe these levels pose a health problem. We are therefore requesting the NC DENR rank this site as a low risk site, and notify the responsibility party that no further action will be required by the NC DENR, i.e., "close out the site".

If you or your staff have any questions please call me.

Sincerely yours,

BPA ENVIRONMENTAL & ENGINEERING, INC.


John M. Stewart, P.G.

cc: M. Hall
K. Woosley
JMS/cwm

TABLE 1
GROUNDWATER ANALYTICAL RESULTS
HAROLD HALL PROPERTY
JAMESTOWN, NORTH CAROLINA

PARAMETER (ug/l)	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7
DICHLORODIFLUOROMETHANE	ND	ND	1.1	ND	9.7	16.9	70.8
TETRACHLOROETHENE	0.9	ND	92.2	12.6	94.1	20.0	42.5
1,2-DICHLOROETHANE	ND	0.8	ND	ND	ND	ND	ND
TRICHLOROETHENE	0.7	ND	ND	ND	13.6	0.6	ND
BENZENE	29.1	433	0.8	ND	13.6	ND	ND
TOLUENE	54.8	690	ND	ND	ND	ND	ND
ETHYL BENZENE	3.9	208	ND	ND	ND	ND	ND
XYLENES	65.8	703	ND	ND	ND	ND	ND
METHYL-T-BUTYL ETHER	584	1017	ND	ND	93.4	ND	ND
ISOPROPYL ETHER	12.2	66.6	ND	ND	108	7.9	ND
NAPHTHALENE	ND	182	ND	ND	ND	ND	ND
BIS(2-ETHYLHEXYL) PHTHALATE	83	44	ND	90	ND	ND	21
2,6-DIMETHYL NAPHTHALENE	>1000	ND	ND	ND	ND	ND	ND
TRIDECANE	>1000	ND	ND	ND	ND	ND	ND
1,2,4-TRIMETHYL BENZENE	ND	900	ND	ND	ND	ND	ND
ETHYL DIMETHYL BENZENE	ND	124	ND	ND	ND	ND	ND
DIMETHYL BENZENE	ND	200	ND	ND	ND	ND	ND
2-METHYL NAPHTHALENE	ND	ND	50	ND	ND	ND	ND
1,7-DIMETHYL NAPHTHALENE	ND	ND	50	ND	ND	ND	ND
2-ETHYL-1-HEXANOL	ND	ND	ND	40	40	ND	ND
LEAD	ND	90	ND	ND	60	ND	ND

NOTE: ND = Not detected at or above minimum quantification limits.

TABLE 2
SOIL SAMPLING DATA
HAROLD HALL PROPERTY
JAMESTOWN, NORTH CAROLINA

SAMPLE NUMBER	DATE SAMPLED	SAMPLE TYPE	DEPTH OF SAMPLE	VOLATILE TPH 5030	SEMI-VOLATILE TPH 3550	OIL & GREASE EPA METHOD 9071
S-1	11/5/93	SPLIT SPOON	10.0	141	224	NA
S-2	11/5/93	SPLIT SPOON	10.0	ND	3.5	NA
S-3	11/5/93	SPLIT SPOON	5.0	NA	NA	NA
S-4	11/5/93	SPLIT SPOON	5.0	NA	NA	NA
S-5	11/5/93	SPLIT SPOON	10.0	ND	1.7	NA
S-6	11/5/93	SPLIT SPOON	10.0	ND	1.4	NA
S-4a	10/21/92	HAND AUGER	6.0	NA	NA	84
S-5a	10/21/92	HAND AUGER	6.0	NA	NA	182
S-6a	10/21/92	HAND AUGER	2.0	NA	NA	258
S-7	11/5/93	SPLIT SPOON	10.0	ND	2.4	NA
S-8	11/5/93	SPLIT SPOON	10.0	ND	1.4	NA
S-9	11/5/93	SPLIT SPOON	10.0	ND	1.7	NA
S-10	9/15/94	HAND AUGER	4.2	ND	ND	NA
S-11	9/15/94	HAND AUGER	5.9	ND	ND	NA

NOTE:

- 1). All results are reported in parts per million (ppm).
- 2). ND= Not detected at or above minimum quantification limits.
- 3). NA = Not analyzed for this constituent.
- 4). Soil samples S-3 and S-4 were not analyzed because field screening indicated that the samples were contaminated.

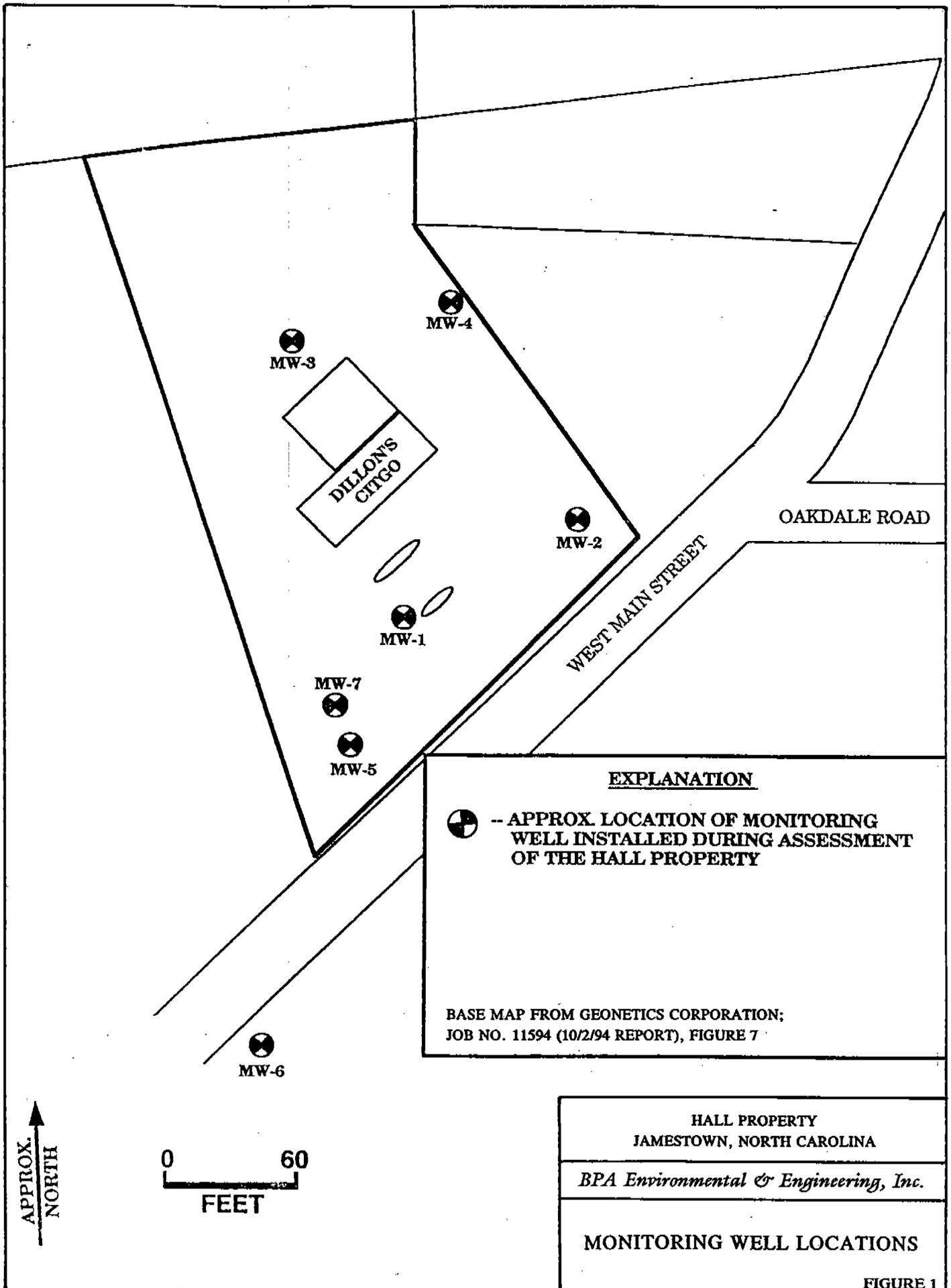
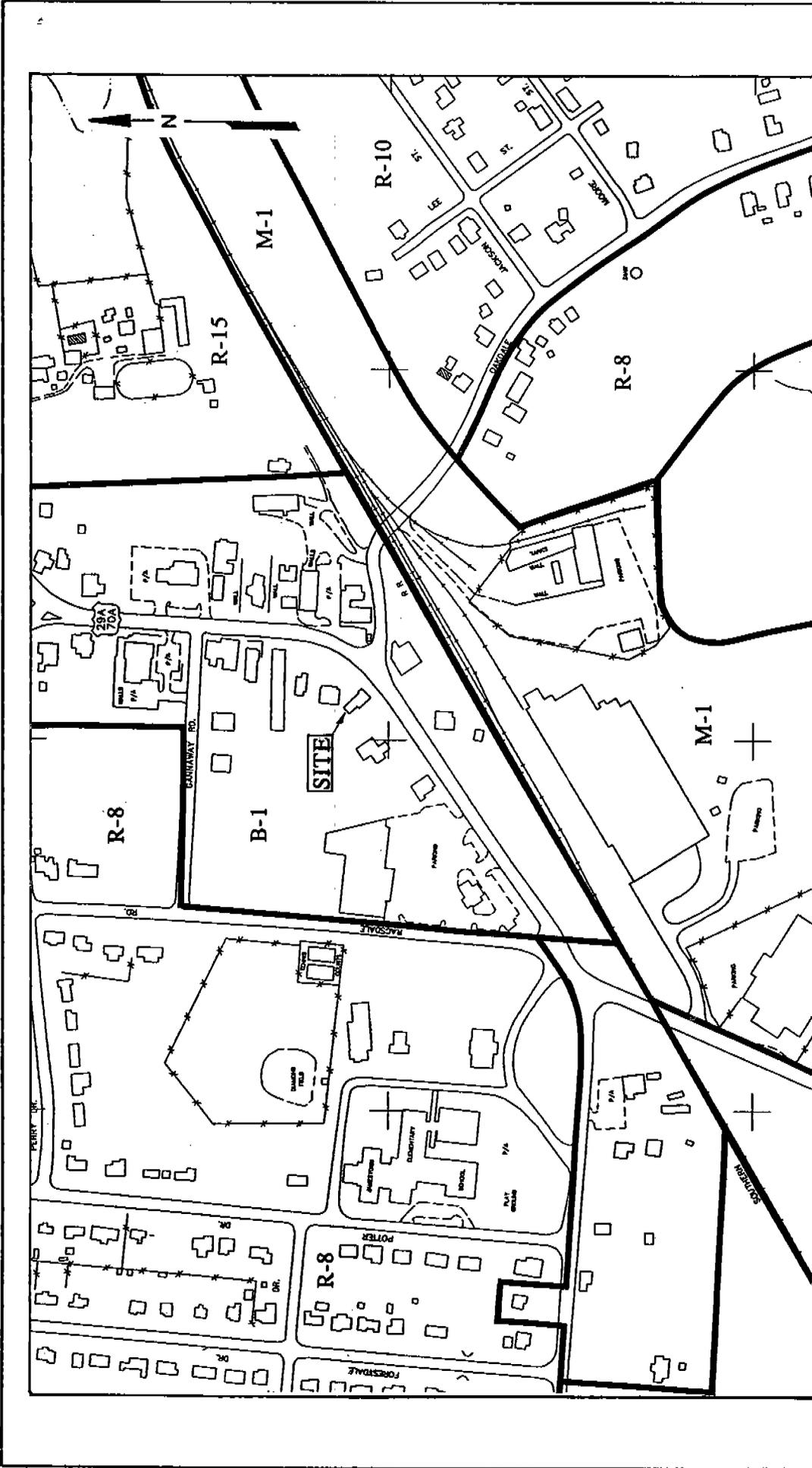


FIGURE 1



EXPLANATION

- B-1 BUSINESS DISTRICT
- M-1 MANUFACTURING DISTRICT
- R-8 RESIDENTIAL DISTRICT
- R-10
- R-15

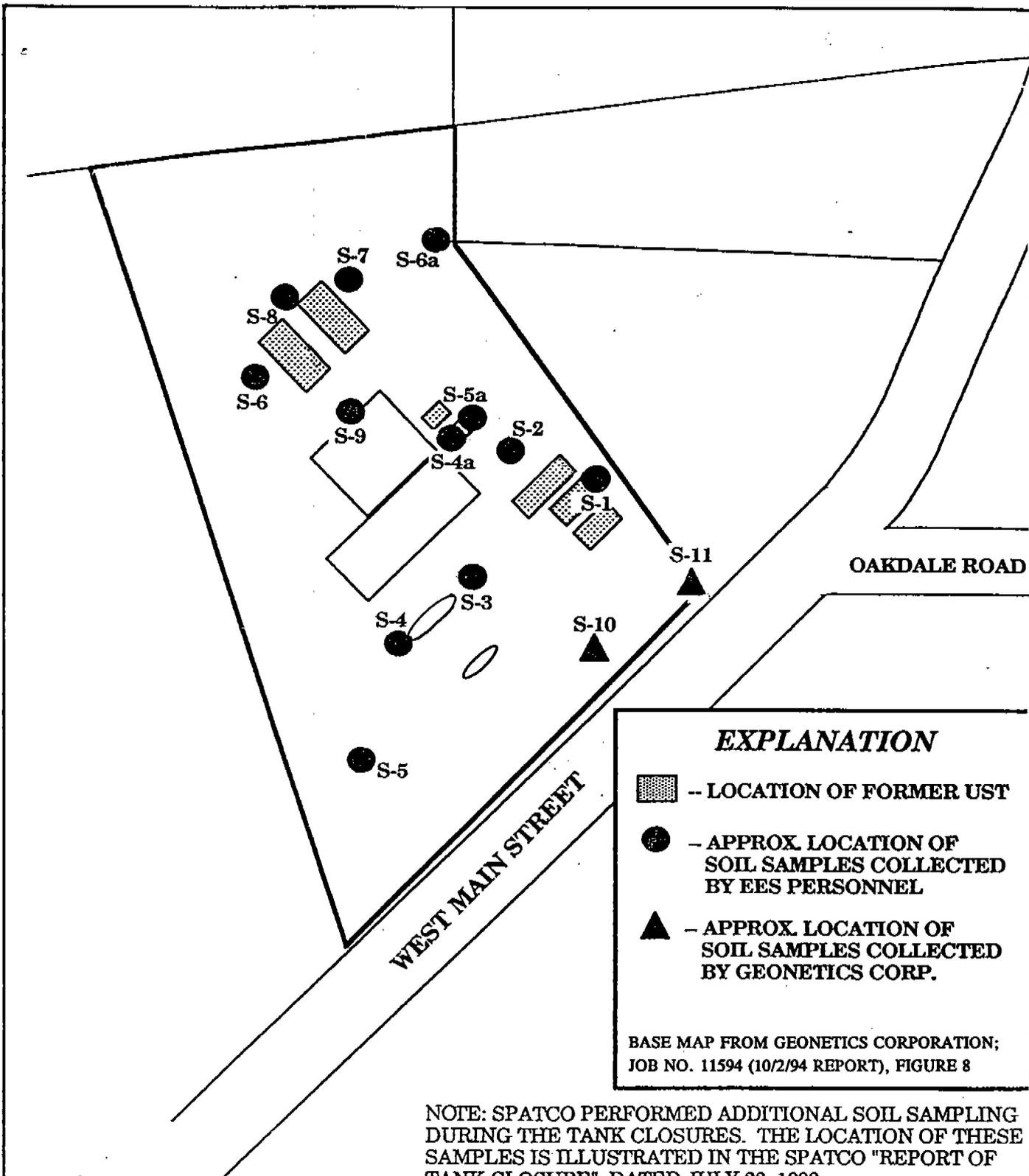


HALL PROPERTY
JAMESTOWN, NORTH CAROLINA

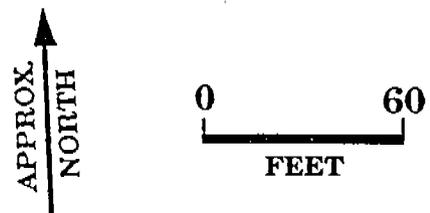
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ZONING MAP

BASE MAP FROM HIGH POINT, NC OFFICIAL
ZONING MAP, MARCH 1, 1992; SHEET NO. J-9(B)
ZONING DATA FROM TOWN OF JAMESTOWN, NC
ZONING MAP; APRIL 1991



NOTE: SPATCO PERFORMED ADDITIONAL SOIL SAMPLING DURING THE TANK CLOSURES. THE LOCATION OF THESE SAMPLES IS ILLUSTRATED IN THE SPATCO "REPORT OF TANK CLOSURE", DATED JULY 22, 1992.



HALL PROPERTY JAMESTOWN, NORTH CAROLINA
<i>BPA Environmental & Engineering, Inc.</i>
SOIL SAMPLING LOCATIONS

FIGURE 3

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Allen P. Smith
 2612 Ingerson Rd
 High Point, N.C.
 27263-2231

4a. Article Number

2052 734 123

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

9-10-98

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X Wilma Smith

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

102595-98-B-0229

Domestic Return Receipt

Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

MR. SAM Mc KAREM
 P.O. Box 1204
 JAMESTOWN, N.C.
 27282

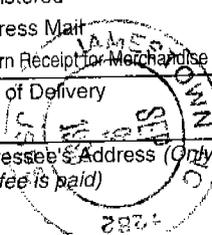
4a. Article Number

2052 734 721

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery



5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X Shirley McKarem

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

102595-98-B-0229

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I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 MR. JOHN FRELLELL
 JAMESTOWN, N.C.
 27282

4a. Article Number: 2052 754 119

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery: 9/10/98

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)
 X

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994 102595-98-B-0229 Domestic Return Receipt

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I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 MRS. EMILY RAGSDALE
 421 E. MAIN
 JAMESTOWN, N.C.
 27282

4a. Article Number: 2507 603 807

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery: 9/9/98

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)
 X Emily Ragdale

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994 102595-98-B-0229 Domestic Return Receipt

Thank you for using Return Receipt Service.

Fold at line over top of envelope to

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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- Complete items 3, 4a, and 4b.
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I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 DIRECTOR OF PUBLIC HEALTH
 DR. HAROLD GABLE
 P.O. BOX 3427
 GREENSBORO, N.C.
 27402

4a. Article Number: 2052 754 118

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery: 9/5/98

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)
 X

8. Addressee's Address (Only if requested and fee is paid)

your RETURN ADDRESS completed on the reverse side?

PS Form 3811, December 1994 102595-98-B-0229 Domestic Return Receipt

Thank you for using Return Receipt Service.