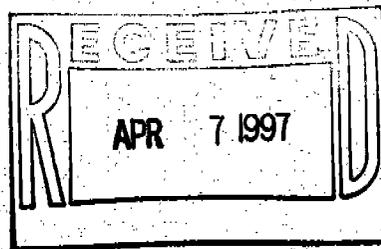


CORRECTIVE ACTION PLAN
MELVIN YARBORO PROPERTY
2205 OAK HILL DRIVE
GREENSBORO, NORTH CAROLINA

APRIL 4, 1997



LEGACY ENVIRONMENTAL SERVICES, INC.



PLAN CERTIFICATION

DIVISION OF ENVIRONMENTAL MANAGEMENT
Certification for the Submittal of a Corrective Action Plan
Under 15A NCAC 2L .0106(l)

Responsible Party: Melvin Yarboro
Address: 1072 Tarry Church Road
City: Star State: NC Zip Code: 27356
Site Name: Yarboro Property
Address: 2205 Oak Hill Drive
City: Greensboro County: Guilford Zip Code: 27408

Groundwater Section Incident Number: 10017

I, Henry Nemargut, a Professional Engineer/Licensed Geologist (circle one) for Legacy Environmental Svcs. (firm or company of employment), do hereby certify that the information indicated below is enclosed as part of the required Corrective Action Plan (CAP) and that to the best of my knowledge the data, site assessments, engineering plans and other associated materials are correct and accurate.

(Each Item must be initialed by hand by the certifying licensed professional).

1. HN A listing of the names and addresses of those individuals required to be notified to meet the notification requirements of 15A NCAC 2L .0114 (b) are enclosed. Copies of letters and certified mail receipts are also enclosed. A copy of the newspaper notice and the title of the newspaper(s) where it was published must be included, if applicable.
2. HN A Professional Engineer or Licensed Geologist has prepared, reviewed, and certified all applicable parts of the CAP in accordance with 15A NCAC 2L .0103(e).
3. HN A site assessment is attached or on file with the appropriate Regional Office which provides the information required by 15A NCAC 2L .0106(g).
4. HN A description of the proposed corrective action and supporting justification is enclosed.
5. HN A schedule for the implementation of the CAP is enclosed.
6. HN A monitoring plan is enclosed which has the capacity to evaluate the effectiveness of the remedial activity and the movement of the contaminant plume, and which meets the requirements of 15A NCAC 2L .0110 and .0106(l).
7. HN The activity which resulted in the contamination incident is not permitted by the State as defined in 15A NCAC 2L .0106(e).

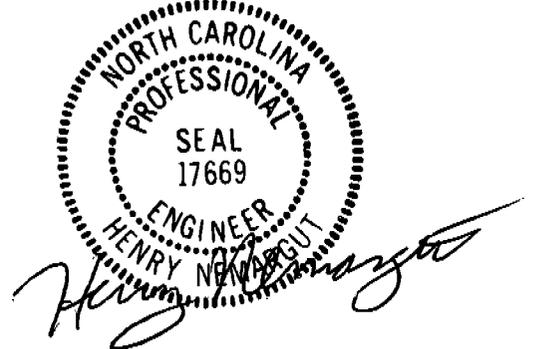
(OVER)

In addition, the undersigned also certifies that to the best of my knowledge and professional judgement and in accordance with the requirements of 15A NCAC 2L .0106(l), the following determinations have been made and are documented in the CAP:

8. HW all sources of contamination and free product have been removed or controlled in accordance with 15A NCAC .0106(f) and (l).
(See guidance document).
9. HW the contaminants have the capacity to degrade and attenuate under the site-specific conditions.
10. HW the time and direction of contaminant travel can be predicted with reasonable certainty.
11. HW the migration of the contaminant will not result in any violation of the standards specified in 15A NCAC 2L .0202 at any existing or foreseeable receptor.
12. HW the contaminants have not and will not migrate onto adjacent properties, or adjacent properties are served by public water supplies which cannot be influenced by contaminants migrating off-site, or adjacent landowners have consented in writing to a request allowing the contaminant upon their property.
13. HW groundwater discharge of the contaminant plume to surface waters will not result in a violation of 15A NCAC 2B .0200.
14. HW the area of the contaminant plume has not been identified by a state or local government use planning process for resource development.
15. HW all necessary access agreements needed to monitor groundwater quality have been or can be obtained.

(Please Affix Seal and Signature)

NOTE: Any modifications made to this form may result in the return of your submittal.



CORRECTIVE ACTION PLAN

**MELVIN YARBORO PROPERTY
2205 OAK HILL DRIVE
GREENSBORO, NORTH CAROLINA**

APRIL 4, 1997

PREPARED BY:

**LEGACY ENVIRONMENTAL SERVICES, INC.
P.O. BOX 4560
GREENSBORO, NC 27403**

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*Obtained from EPA Publication EPA 510-F-93-030

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**Corrective Action Plan Report
Melvin Yarboro Property
2205 Oak Hill Drive
Greensboro, North Carolina**

1.0 INTRODUCTION

1.1 Site Information

Site Location and Usage: Melvin Yarboro owns a lot containing one occupied structure used for residence at 2205 Oak Hill Drive in Greensboro, North Carolina. Figure 1 illustrates the location of this facility on the U.S.G.S. Greensboro, N.C. topographic quadrangle, and Figure 2 illustrates the project location in relation to adjacent properties. The adjacent surrounding area is used primarily for residential purposes.

Property Owner: Melvin Yarboro
1072 Tarry Church Road
Star, North Carolina 27356

Responsible Party: same as above

Groundwater Incident (GWI) Number: 10017

1.2 Source Information

Release Source: (1) 550-gallon non-commercial heating oil UST used for heating of the residence.

On-site Source Type: Low boiling point hydrocarbons according to Method 5030 Total Petroleum Hydrocarbons (TPH) and high boiling point hydrocarbons according to 3550 TPH.

1.3 Contamination Assessment

Soil: Approximately 250 tons of petroleum impacted soils above final clean-up levels of 10 and 40 parts per million (ppm according to Methods 5030 and 3550 TPH respectively) were identified in our investigation. Contaminants consist of 3550 TPH at a maximum level of 1,450 ppm and 5030 TPH at a maximum level of 145 ppm. Table 1 summarizes soil sample field and laboratory analytical results.

Groundwater: During sampling events in 1995 and 1995, total xylenes, naphthalene, lead, and seven tentatively identified compounds (TICs) were detected in well MW-1. No other wells at the site showed detectable compounds during these sampling events. On May 31, 1996 1,2 Dichlorobenzene and several TICs were detected in MW-1. No compounds were detected in any other well at the site during the 1996 sampling event. On February 24, 1997 the monitor wells were resampled, and MW-1 and MW-5 showed detectable concentrations of TICs. In addition, 2-Ethylhexyl Phthalate was reported in excess of the current 2L Standards in MW-5.

1.4 Aquifer Testing

One single well falling head test or "slug test" was performed on MW-4 to determine the saturated hydraulic conductivity of the water table aquifer. MW-4 was selected since it is the only on-site well in which the screened interval is totally located beneath water table. The method of Bouwer and Rice (Bouwer and Rice, 1989, 1976) was chosen to reduce the slug test data. A computer program developed by the Geraghty & Miller Modeling Group named AQTESOLV was used to estimate the aquifer parameters. Results of the slug test indicate a hydraulic conductivity in the tested well of 2.57×10^{-4} feet/minute. This result is consistent with published values for silt, loess and silty sand (Freeze & Cherry, 1979). Slug test data are included in Appendix A.

Ground water flow velocity was determined by averaging the hydraulic conductivity values and assuming an estimated effective porosity of 20% for soils at the site. The following equation yields an estimate of average ground water flow velocity:

$$v = k/n \times dh/dl$$

Where v =average ground water flow velocity
 K =average hydraulic conductivity= 2.57×10^{-4} ft/min.
 n =effective porosity=0.20
 dh/dl =ground water head gradient=0.039 ft/ft

Average ground water flow velocity at the site is calculated to be 5.01×10^{-5} feet/minute (26.34 feet/year).

1.5 Initial Remedial Actions to Date

No remedial actions have been initiated to date at the site. The non-regulated 550 gallon heating oil UST was removed on February 24, 1993. Soils removed during the tank removal were placed back into the excavation pending analytical results and evaluation of remedial alternatives.

1.6 Regulatory Requirements

Applicable Regulations:

- 1) Oil Pollution and Hazardous Substances Control Act, North Carolina General Statutes 143-215.75;
- 2) Groundwater Classifications and Standards, Title 15A, North Carolina Administrative Code (NCAC), Subchapter 2L; and
- 3) Criteria and Standards Applicable to Underground Storage Tanks, NCAC, Title 15A, Chapter 2, Subchapter 2N.

Groundwater Classification: Class GA

Current Maximum Groundwater Contaminant Concentrations:

<u>Constituent</u>	<u>Max. Conc.</u>	<u>2L STD</u>
Ethylbenzene	4 ug/l(MW-1)	29
Total Xylenes	24 ug/l(MW-1)	530
Naphthalene	15 ug/l(MW-1)	21
1,2 Dichlorobenzene	10 ug/l(MW-1)	NSE*
1,3 Dichlorobenzene	4 ug/l(MW-1)	NSE
1,4 Dichlorobenzene	19 ug/l(MW-5)	NSE
2-Ethylhexyl Phthalate	45 ug/l(MW-5)	3
Di-n-Octylphthalate	45 ug/l(MW-5)	140
Lead	45 ug/l(MW-3)	15
Total TICs	272.5 ug/l(MW-1)	NSE

*NSE = No Standard Established

1.7 Previous Reports

- 1) *UST Closure Report*, Catlin & Associates, Inc., March 24, 1993;
- 2) *Initial Site Characterization Report*, Legacy Environmental Services, Inc., May 4, 1994;
- 3) *Comprehensive Site Assessment Report*, Legacy Environmental Services, Inc., March 10, 1995.
- 4) *Pre-CAP Monitoring Report*, Legacy Environmental Services, Inc., June 14, 1996;
- 5) *Pre-CAP Monitoring Report*, Legacy Environmental Services, Inc., March 14, 1997;

2.0 OBJECTIVES OF THE CORRECTIVE ACTION PLAN

2.1 Goals and Expected Accomplishments

The goal of the Corrective Action Plan (CAP) is to remediate the petroleum hydrocarbon impacted soils at the site. To date, impact on the groundwater in the vicinity of the release has been extremely minimal. Only one 2L Violation exists for target compounds associated with fuel oil; this violation is for 2-Ethylhexyl Phthalate in MW-5. Therefore, by the expedient removal and treatment of the impacted soils, the risk of further impact to the groundwater will be reduced. To accomplish this goal, the CAP will focus on soil treatment. Remnant contaminants remaining in shallow groundwater will be at levels suitable for remediation by natural processes.

2.2 Target Cleanup Concentrations for Soil

The target cleanup concentrations for soil at the subject facility are dictated by guidelines and regulations enforced by the NCDEHNR. Soils located within the impacted area should be remediated to 40 ppm for 3550 TPH compounds and to 10 ppm for 5030 compounds since contaminated soils have been identified within 5' of the seasonal high water table. Contaminants consist of 3550 TPH at a maximum level of 1,450 ppm and 5030 TPH at a maximum level of 145 ppm. Legacy's depth to groundwater data indicates that groundwater varies with depths ranging from approximately 9 feet to 21 feet below ground surface at the site during wet and dry seasons.

2.3 Target Cleanup Concentrations for Groundwater

The target cleanup concentrations for dissolved petroleum constituents in groundwater are dictated by guidelines and regulations enforced by the NCDEHNR as specified in 15A NCAC 2L (2L Standards). Dichlorobenzene, Ethylbenzene, total Xylenes, and Naphthalene were detected in MW-1 at levels below current listed 2L Standards. The Tentatively Identified Compounds (TICs) found in MW-1 have a total concentration of 218.3 ppb and currently have no 2L Standard. Monitor well MW-5, which is located approximately 12' down-gradient of the release source, has shown a 2L Violation for 2-Ethylhexyl Phthalate. In addition Di-n-Octylphthalate, Naphthalene, and Dichlorobenzene constituents were indicated at levels below 2L Standards. Cleanup of groundwater shall be accomplished by secondary source (soil) removal and natural processes.

2.4 Evaluation of Alternate Standards & Natural Processes

The suitability of the CAP approval without requiring groundwater remediation to standards according to 2L .0106 (K) were evaluated for the project site. Natural processes are considered appropriate for remediation of groundwater at this site for the following reasons:

- o No free product is known to exist at the site. Excavation and removal of petroleum impacted soils would remove the source of further contamination to groundwater.
- o The direction of groundwater migration is towards the east. Monitoring well MW-5 is situated in the down-gradient direction and could be utilized to detect any increases in concentrations of contaminants that may migrate by advective transport from the source area at MW-1.
- o With the exception of 2-Ethylhexyl Phthalate, no 2L violations exist for target organic compounds.
- o The detected compounds are not expected to intercept surface waters which are located approximately 1,500 feet to the east.
- o Monitoring wells MW-3 and MW-4 are situated in the down-gradient direction and will be utilized to ensure that contaminants do not migrate onto adjoining properties.

2.5 Target Start-up and Completion Dates

The target Start-up and completion dates are summarized as follows:

<u>Item</u>	<u>Completion Date</u>
Initiation of soil removal and remedial action:	Within one month of CAP approval
Project Completion Date	30 days after initiation

The proposed Start-up dates are achievable assuming the following: 1) timely approval of the CAP. 2) funds are available to pay for professional services and expenses incurred. 3) there is little or no interference with the proposed remediation activities to be initiated at the site.

3.0 EXPOSURE ASSESSMENT

3.1 Historical Analytical Data

Samples collected at the Melvin Yarboro property have revealed the presence of petroleum constituents in soil and, to a minor extent, groundwater. Table 1 summarizes laboratory and field analytical results for soil samples collected at the site. Laboratory reports for the data summarized in Table 1 are included in the Comprehensive Site Assessment (CSA) prepared for this site. Figures 4 and 4A illustrate the approximate horizontal distribution of petroleum impacted soils according to Methods 5030 and 3550 respectively. These figures illustrate the estimated extent of Method 5030 and 3550 TPH according to WSRO recommended clean-up levels (10 ppm-5030; 40 ppm-3550). Figure 5 illustrates the soil sample locations and results according to Methods 5030 and 3550 in cross-section. Figure 6 depicts the estimated groundwater flow direction at the site as measured 2-24-97.

3.2 Physical and Chemical Characteristics of Contaminants

Contaminants discovered at the Melvin Yarboro property were confirmed by laboratory analyses to be low boiling point total petroleum hydrocarbons (TPH) according to Method 5030 and high boiling point TPH according to Method 3550 which is sorbed onto soil particles in the vicinity of the former UST location. 2-Ethylhexyl Phthalate was the only compound showing a 2L Violation in the groundwater at the site.

3.3 Potential Human Exposure Pathways

The Melvin Yarboro property is located in an area which is primarily of residential use. The release area is situated on a moderately eastward sloping lot with an average elevation of 890 feet above mean sea level. The nearest surface water point is a unnamed tributary of Buffalo Lake located approximately 1,500 feet to the east of the site.

No water supply wells were revealed during site reconnaissance within a 1,500 foot radius of the site. The surrounding properties utilize municipal water supplied by the City of Greensboro. No underground utilities or structures were noted in vicinity of the release area.

3.4 Potential Effects of Residual Contamination

3.4.1 Soil

Remnant petroleum hydrocarbons in soils near the former USTs at the Melvin Yarboro property following remediation will be at such levels that natural attenuation and dispersion processes should adequately protect receptors.

3.4.2 Ground and Surface Waters

Based on laboratory analytical data from the perimeter monitoring wells, the detected compounds appear limited to the immediate source area in the vicinity MW-1 and MW-5. Remnant contaminant in groundwater near the former USTs at the Melvin Yarboro property following soil remediation will be at such levels that natural processes should adequately protect nearby surface waters. Local groundwater is not used for consumptive purposes.

4.0 EVALUATION OF REMEDIAL ALTERNATIVES

4.1 Available Remedial Options - Groundwater

Since 2-Ethylhexyl Phthalate is the only compound with a 2L Violation at the site and because the level is not significantly above the 2L Standard, groundwater remediation by natural processes is recommended at the site. It is believed that source removal (soil excavation) will adequately protect the groundwater at the site.

4.2 Available Remedial Options - Soil

Options which have been considered for remediation of soil at the Melvin Yarboro site have been limited to ex-situ methodologies in an effort to limit the possible impact to groundwater that may result if the soils are left in place during remediation and also due to space constraints. The options evaluated include: 1) Ex situ bioremediation: Land farming; 2) Excavation and Off-Site Treatment; and 3) Ex-situ bioremediation: Biomounding. Tables 2A, 2B, & 2C are excerpts from EPA Publication EPA 510-F-93-029 which summarizes the relative advantages and disadvantages of the various options which have been considered. The following is a brief discussion of each technology:

4.2a Ex-Situ Bioremediation: Land Farming

Ex-situ bioremediation, land farming or land treatment, is a technique for removing biodegradable contaminants from excavated soil. The excavated soil and added nutrients are spread over a lined treatment area. The area is periodically tilled to facilitate the natural release of volatile organic compounds (VOCs) and the biodegradation of contaminants.

Land farming is effective on many soil types and a variety of contaminants. It is also easy and inexpensive to design, operate, and maintain.

4.2b Excavation and Off-Site Treatment

Excavation and off-site treatment is a method for removing contaminants from small volumes (<1,000 cubic yards) of soil that cannot be treated effectively on site. Numerous treatment facilities are permitted in North Carolina which remediate contaminated soils via landfarming, thermal desorption, brickmaking, and bio-remediation.

This remediation technique can be used with almost any type of petroleum contamination and soil type. Implementation of this technique requires no permitting or design of remediation systems.

4.2c Ex-Situ Bioremediation: Biomounding

Ex-situ bioremediation (biomounding) is a technique for removing biodegradable contaminants from excavated mounds of soil. Nutrients are added to the soil mounds, which are often several feet high, to facilitate bioremediation, aeration conduits and irrigation systems are constructed in the mound. Biomounding is appropriate for shallow contamination sites that cover a large horizontal area. This is a low maintenance technique that requires a relatively short treatment time. Biomounding also provides better control over aeration, moisture, nutrient levels, and soil texture than other methods.

4.3 Recommended Remedial Option

Based on the apparently limited extent of petroleum affected soil, contaminant concentrations, low cost associated with disposal, and the physical constraints of the project site, excavation and off-site treatment is recommended.

5.0 PROPOSED CORRECTIVE ACTION PLAN

The cost for remediation of the site via excavation and ex-situ remediation has been estimated. Appendix B contains the estimated clean-up cost for the this project. Since numerous permitted facilities exist across North Carolina which are capable of treatment and disposal of fuel oil contaminated soils, a competitive bid solicitation will be issued for excavation and disposal of the 250 tons of soils estimated at the project site. Bid preparation, collection and award shall be conducted in accordance with the work tasks outlined in North Carolina LPUST Non-commercial Trust Fund.

5.1 Project Overview & Total Cost

Subsequent to NCDEHNR acceptance of the CAP, the soils will be excavated within the boundaries of the impacted areas, transported for disposal, and replaced with clean backfill in the excavation.

As required by the NCDEHNR, a composite sample will be collected from every 200 cubic yards of remediated soil and submitted for analysis according to Method 5030 and 3550 TPH. The petroleum impacted soils will be remediated to less than 10 ppm according to Method 5030 and 40 ppm according to Method 3550. The assumed maximum depth of excavation will be 20 feet below ground level (bgl) based on data obtained from boring B-2.

Confirmatory samples will be collected for analyses according to Methods 5030 and 3550 TPH from the boundaries of the excavation to verify compliance with specified final clean-up levels.

Based on the proposed cleanup methodology, the scope of work anticipated in our bid solicitation, and the estimated extent of soil contamination, the estimated total cost for soil remediation is calculated in Appendix B. Appendix B also contains the estimated cost for in-situ treatment methodologies which clearly indicate that excavation and disposal is the most cost effective method of site remediation.

5.2 Post Clean Up Monitoring

Following implementation of the CAP, five monitor wells, MW-2 through MW-6, will remain on site. We recommend that these wells be monitored for semi-annually after soil remediation to ensure that no 2L groundwater violations exist at the site. We recommend that the site be closed following two consecutive sampling events with no 2L violations.

6.0 LIMITATIONS

This CAP has been prepared for the exclusive use of Melvin Yarboro for specific application to the referenced site located in Guilford County, North Carolina. The Corrective Action Plan was prepared based on the scope of work and level of effort desired by the client and with resources adequate only for that scope of work. The findings have been developed in accordance with generally accepted standards of geology and hydrogeology practices in the State of North Carolina and our professional judgment. No effort has been made to misrepresent the conditions at the site. No other warranty is expressed or implied.

The data presented in this report are indicative of conditions that existed at the precise locations sampled and at the time the sample was collected. Additionally, the data obtained from samples would be interpreted as being meaningful with respect to parameters indicated in the laboratory report. No additional information can logically be inferred from this data.

7.0 REFERENCES

Legacy Environmental Services, Inc., "Initial Site Characterization Report," dated 4, 1994, for Melvin Yarboro Property, Greensboro, North Carolina.

Legacy Environmental Services, Inc., "Comprehensive Site Assessment Report," dated March 10, 1995, for Melvin Yarboro Property, Greensboro, North Carolina.

Legacy Environmental Services, Inc., "Pre-CAP Monitoring Report," dated June 14, 1996, for Melvin Yarboro Property, Greensboro, North Carolina.

Legacy Environmental Services, Inc., "Pre-CAP Monitoring Report," dated March 14, 1997, for Melvin Yarboro Property, Greensboro, North Carolina.

"An Overview of Underground Storage Tank Remediation Options", U.S. EPA Office of Solid Waste and Emergency Response; Publication # EPA 510-F-93-029; October, 1993.

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Bouwer, H., and Rice, R.C., 1976, A Slug Test for Determining Hydraulic Conductivity of Unconfined Aquifers With Completely or Partially Penetrating Wells, Water Resources Research, Vol. 12, No. 3. 1976.

Bouwer, H., 1989, The Bouwer and Rice Slug Test-An Update, Ground Water, Vol. 27, No. 3.

Kruseman, G.P., and deRidder, N.A., 1989, Analysis and Evaluation of Pumping Test Data, International Institute for Land Reclamation and Improvement/ILRI, Wageningen, The Netherlands, 377 p.

Freeze, R.A. & Cherry, J.A., 1979, Groundwater, Prentice Hall, Englewood Cliffs, NJ, 566 p.

8.0 CERTIFICATION

The Corrective Action Plan for this site has been prepared by Legacy Environmental Services, Inc. under the direct supervision of licensed engineers or geologists. Technical review of this document has been provided by Henry Nemargut Engineering Services. All engineering work performed on this project was conducted under my direct supervision:



Henry Nemargut, P.E.
Henry Nemargut Engineering Services
North Carolina License #17669

TABLES

TABLE 1
FIELD AND LABORATORY ANALYTICAL RESULTS
SOIL SAMPLES

2205 OAK HILL DRIVE
 GREENSBORO, NORTH CAROLINA

SAMPLE ID	LOCATION	DATE	DEPTH (FT)	TPH (3550)*	TPH (5030)*	OVA **
DN-1	North End UST	2/24/93	8'	103	89.7	N/A
DS-2	South End UST	2/24/93	8'	1,450	145	N/A
B1-8	Boring 1	2/9/95	8'	<40	<10	<10
B1-16	Boring 1	2/9/95	16'	<40	<10	<10
B2-8	Boring 2	2/9/95	8'	120	<10	<10
B2-16	Boring 2	2/9/95	16'	820	<10	56

* Results in parts per million (ppm)

** Field Screening Method (Photoionization Detector) in ppm

N/A = Not Analyzed

<10 and <40 = Below Detection Limits

TABLE 1 (CONT.)
FIELD AND LABORATORY ANALYTICAL RESULTS
SOIL SAMPLES (CONT.)

SAMPLE ID	LOCATION	DATE	DEPTH (FT)	TPH (3550)*	TPH (5030)*	OVA **
B3-8	Boring 3	2/9/95	8'	<40	<10	<10
B3-16	Boring 3	2/9/95	16'	<10	<10	<10
B4-8	Boring 4	2/9/95	8'	<40	<10	<10
B4-16	Boring 4	2/9/95	16'	<40	<10	<10

* Results in parts per million (ppm)

** Field Screening Method (Photoionization Detector) in ppm

N/A = Not Analyzed

<10 and <40 = Below Detection Limits

Table 2A: Soil Remedial Option #1: Ex-situ Land Farming

Ex Situ Bioremediation: Land Farming	
Advantages	<ul style="list-style-type: none"> • Simple and inexpensive to design, operate, and maintain • Effective on many soil types with a variety of contaminants
Limitations	<ul style="list-style-type: none"> • Targets only biodegradable constituents • Requires substantial space
System Components	<ul style="list-style-type: none"> • Nutrients (fertilizer) • Lined treatment cell with berms around the perimeter • Tilling equipment • Lime (needed for low pH) • Irrigation equipment (optional)
Wastestream Treatment	<ul style="list-style-type: none"> • Might need to treat or dispose of collected rainwater or leachate
Parameters to Monitor¹	<ul style="list-style-type: none"> • Soil contaminant concentration • Microbial population in soil • Soil pH, moisture, and nutrients • Leachate analysis (optional)
Cleanup Levels and Timing²	<ul style="list-style-type: none"> • Treats ≥ 90% of biodegradable constituents • For an ideal site³, ~90% in 6 months to 2 years • For an average site⁴, ~90% in 6 months to 3 years • Longer time required to degrade heavier hydrocarbons
Costs⁵	<ul style="list-style-type: none"> • For an average site⁴, \$20,000 to \$70,000 (\$20 to \$70/cu yd) • Costs vary with the amount of soil to be treated and the design of the containment cell

¹Parameters to monitor are for performance purposes only; compliance monitoring parameters vary by state.

²Cleanup levels are determined by the state.

³An "ideal site" assumes no delays in corrective action and a relatively homogeneous, permeable subsurface.

⁴An "average site" assumes minimal delays in corrective action and a moderately heterogeneous and permeable subsurface.

⁵Costs include equipment, and operation and maintenance.

Table 2B: Soil Remedial Option #2: Ex-situ Thermal Desorption

Ex Situ Bioremediation: Biomounding	
Advantages	<ul style="list-style-type: none"> • Degrades semivolatile organic compounds (SVOCs) and nonvolatile organic compounds • Requires low maintenance • Entails a relatively short treatment time • Enhances control and management of aeration, moisture, nutrients, and soil texture • Can use treated soil as backfill
Limitations	<ul style="list-style-type: none"> • Targets only biodegradable constituents • Must excavate soil and remove debris • Requires sufficient nutrients, moisture, active indigenous microbial population, and pH of 6-9 to degrade contaminants
System Components	<ul style="list-style-type: none"> • Plastic liner • Gravel and slotted pipe to provide air to mound • Nutrients • Blower • Soil vapor sampling probes • Irrigation system (optional) • Plastic cover (optional) • Vapor treatment equipment (optional)
Wastestream Treatment	<ul style="list-style-type: none"> • Vapor treatment options (might be needed for high concentrations of contaminants): <ul style="list-style-type: none"> • <i>Granulated activated carbon</i> • <i>Internal combustion engine</i> • <i>Catalytic oxidation unit</i> • <i>Thermal incinerator</i>
Parameters to Monitor¹	<ul style="list-style-type: none"> • Vapor concentration • Airflow rate • Soil contaminant concentration • Microbial population • Soil pH, moisture, and nutrients • Leachate analysis (optional)
Cleanup Levels and Timing²	<ul style="list-style-type: none"> • Treats $\geq 90\%$ of biodegradable constituents • For an ideal site³, $\sim 90\%$ in 6 months to 18 months • For an average site⁴, $\sim 90\%$ in 6 months to 2 years • Longer time required to degrade heavier hydrocarbons
Costs⁵	<ul style="list-style-type: none"> • For an average site⁴, \$80,000 to \$125,000 (\$80 to \$125/cu yd) • Unit costs generally decrease as soil volume increases

¹Parameters to monitor are for performance purposes only; compliance monitoring parameters vary by state.

²Cleanup standards are determined by the state.

³An "ideal site" assumes no delays in corrective action and a relatively homogeneous, permeable subsurface.

⁴An "average site" assumes minimal delays in corrective action and a moderately heterogeneous and permeable subsurface.

⁵Costs include equipment, and operation and maintenance.

Table 2C: Soil Remedial Option #3: Ex-situ Biomounding

On-Site Low Temperature Thermal Desorption	
Advantages	<ul style="list-style-type: none"> • Rapid to implement • Minimizes long-term liability • Can reuse some types of soil for backfill
Limitations	<ul style="list-style-type: none"> • Expensive for soil with high moisture or clay content • Might require air discharge permits
System Components	<ul style="list-style-type: none"> • Excavation equipment • Sorting and sizing equipment • Rotary kiln • Offgas treatment equipment
Wastestream Treatment	<ul style="list-style-type: none"> • Air emissions equipment
Parameters to Monitor¹	<ul style="list-style-type: none"> • Contaminant concentrations in pre- and post-treatment soil
Cleanup Levels and Timing²	<ul style="list-style-type: none"> • Can excavate to cleanup standards • >99% removal efficiency • Typically completed in 6 to 8 weeks
Costs³	<ul style="list-style-type: none"> • For an average site⁴, \$60,000 to \$100,000 (\$60 to \$100/cu yd)

¹Parameters to monitor are for performance purposes only; compliance monitoring parameters vary by state.

²Cleanup standards are determined by the state.

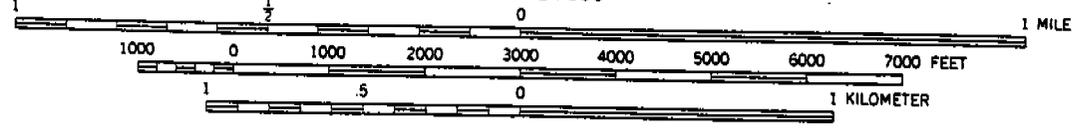
³Costs include equipment, and operation and maintenance.

⁴An "average site" assumes minimal delays in corrective action and a moderately heterogeneous and permeable subsurface.

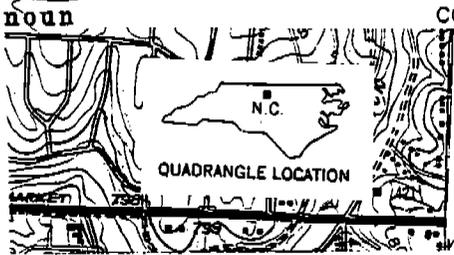
FIGURES



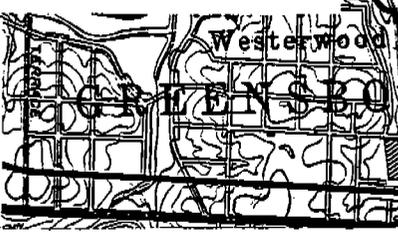
SCALE 1:24 000



CONTOUR INTERVAL 10 FEET



GREENSBORO, N. C.
36079-A7-TF-024
1951
PHOTOREVISED 1968
DMA 5056 III SE-SERIES V842



LEGACY ENVIRONMENTAL SERVICES, INC.
GREENSBORO, NORTH CAROLINA

MELVIN YARBOROUGH
GREENSBORO, NC

CLIENT:

CAP
2205 OAK HILL DRIVE
GREENSBORO, N.C.

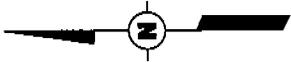
PROJECT:

PROJECT LOCATION
U.S.G.S. TOPO MAP
GREENSBORO QUADRANGLE

TITLE:

SCALE: 1"=2000'
DATE: 8/21/95
DWN.BY: KBM
DWG.# L 94-181A

FIGURE 1



LEGEND

SCALE
0' 50' 100'

8 PROPERTY ID NUMBER
3 BLOCK ID NUMBER

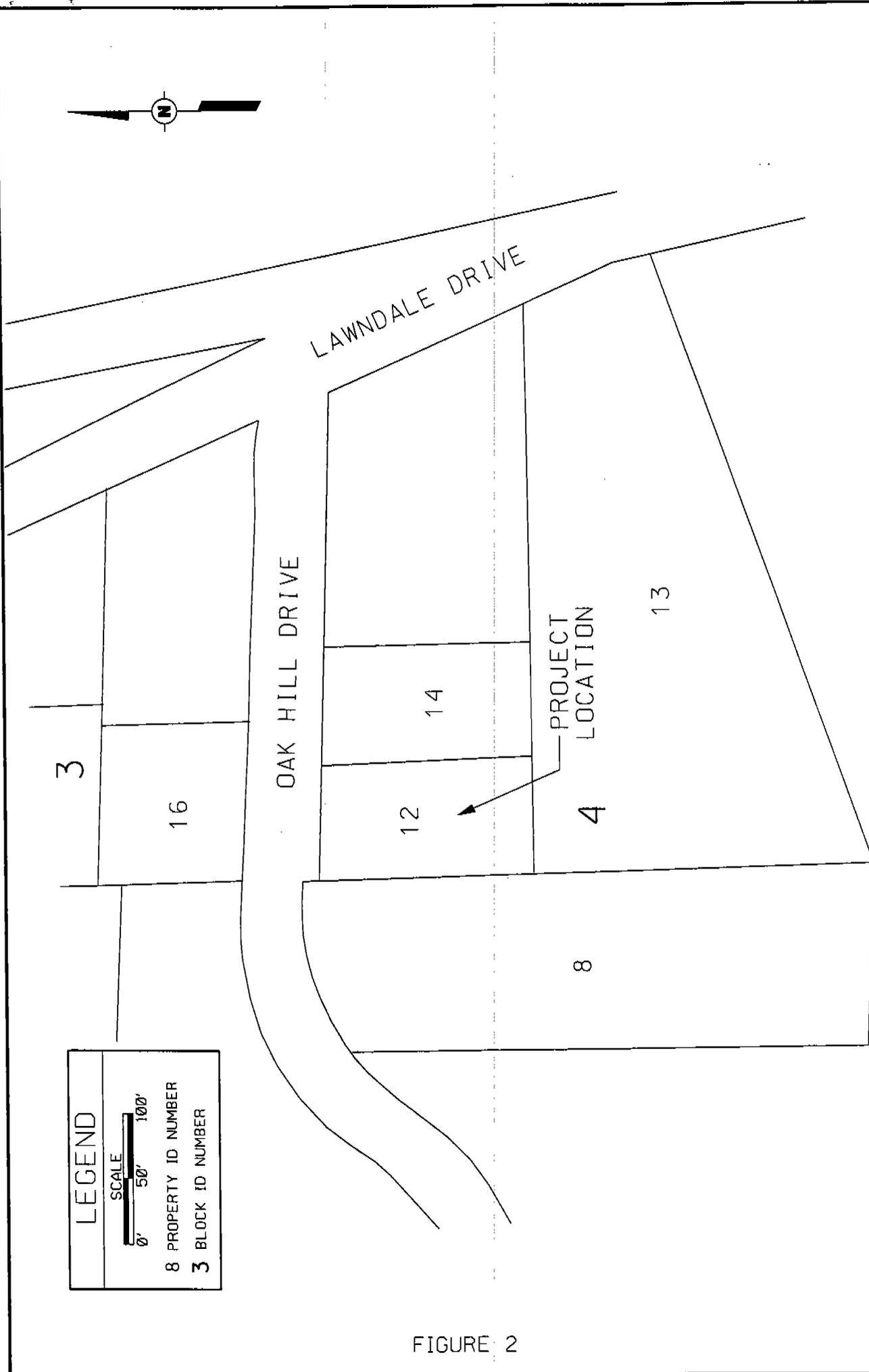


FIGURE 2

SCALE: 1"=100'	TITLE: ADJACENT PROPERTIES MAP	PROJECT: CAP	CLIENT: MELVIN YARBOROUGH GREENSBORO, NC	LEGACY ENVIRONMENTAL SERVICES, INC. GREENSBORO, NORTH CAROLINA
DATE: 8/21/95	2205 OAK HILL DRIVE GREENSBORO, NC			
DWN.BY: KBM				
DWG.# L 95-181Z				

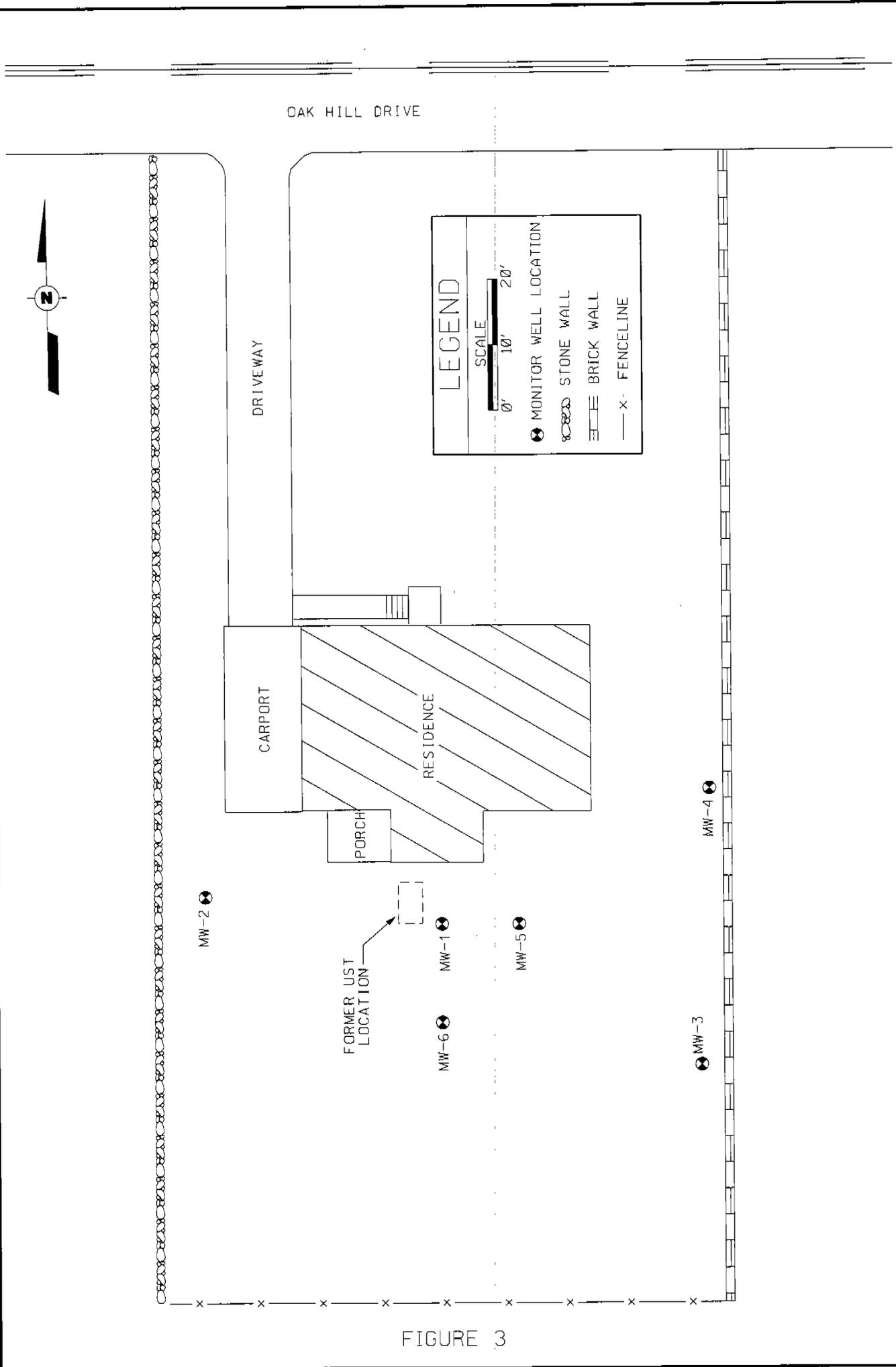


FIGURE 3

SCALE: 1"=20'	TITLE: SITE LAYOUT AND MONITOR WELL LOCATIONS	PROJECT: CAP	CLIENT: MELVIN YARBOROUGH GREENSBORO, NC	 LEGACY ENVIRONMENTAL SERVICES, INC. GREENSBORO, NORTH CAROLINA
DATE: 3/12/97	2205 OAK HILL DRIVE GREENSBORO, N.C.			
DWN.BY: KBM				
DWG.#: L97-131				

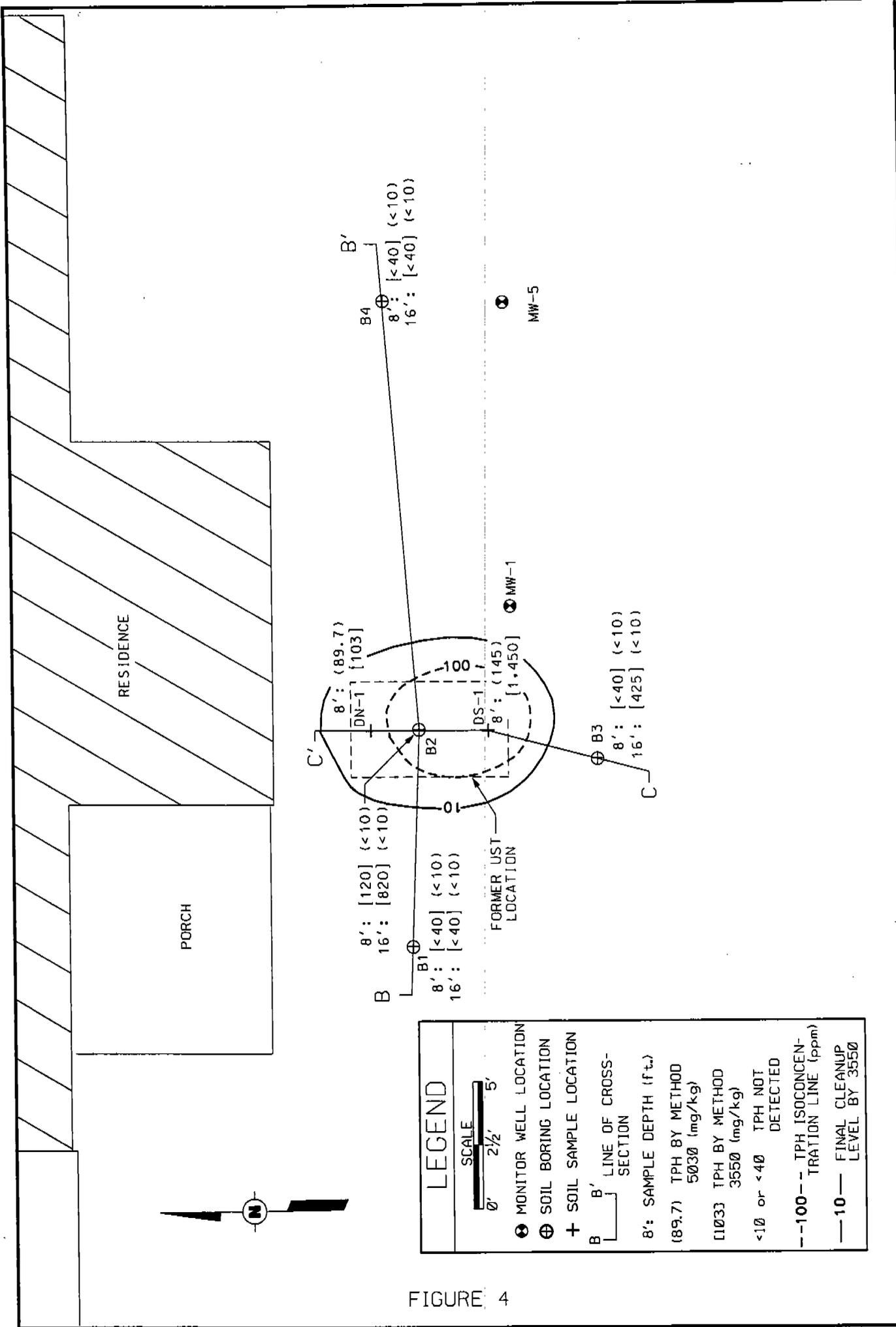


FIGURE 4

LEGEND	
SCALE 0' 2 1/2' 5'	
⊗	MONITOR WELL LOCATION
⊕	SOIL BORING LOCATION
+	SOIL SAMPLE LOCATION
B B'	LINE OF CROSS-SECTION
8':	SAMPLE DEPTH (ft.)
(89.7)	TPH BY METHOD 5030 (mg/kg)
[103]	TPH BY METHOD 3550 (mg/kg)
<10	TPH NOT DETECTED
--100--	TPH ISOCONCENTRATION LINE (ppm)
—10—	FINAL CLEANUP LEVEL BY 3550

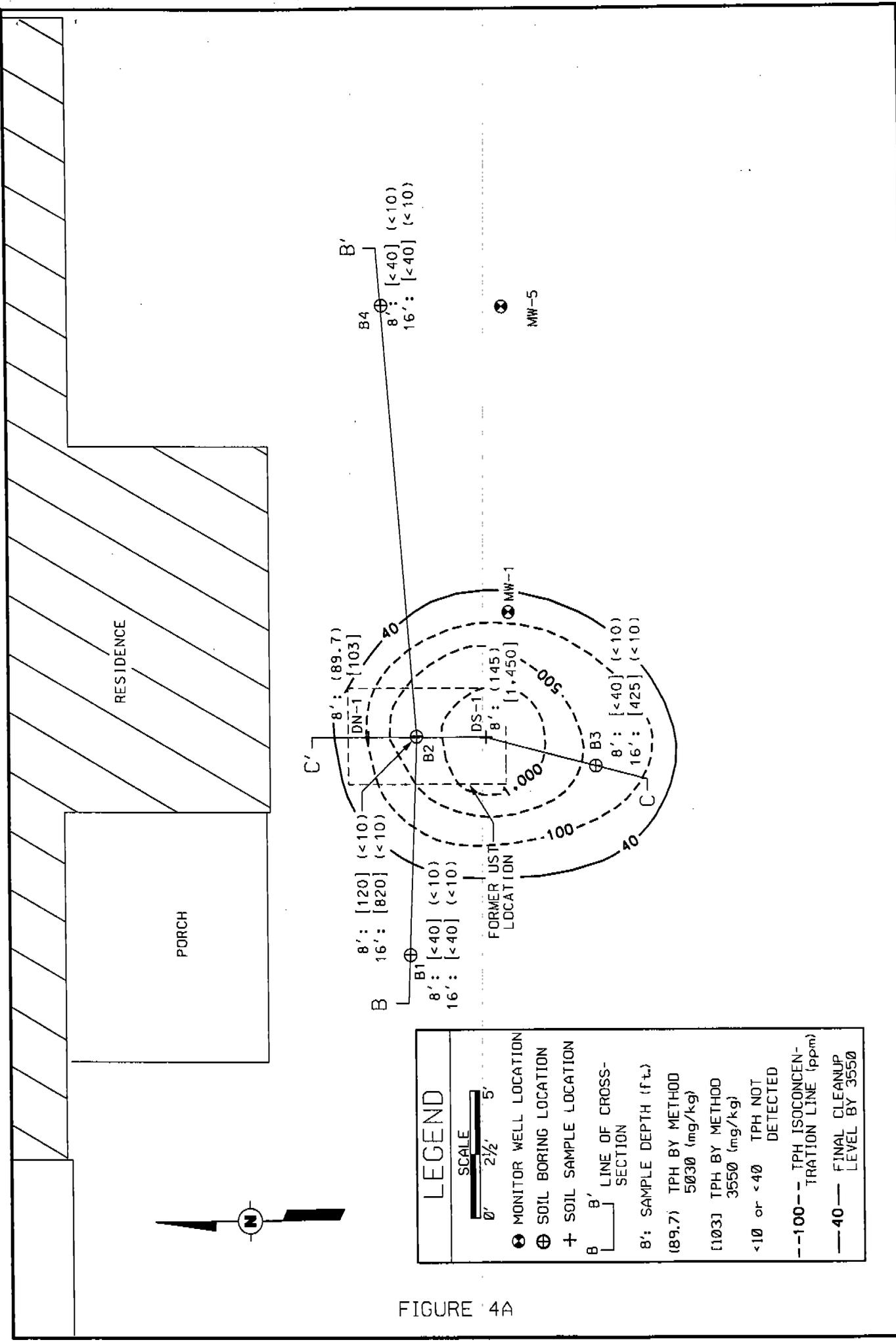


FIGURE 4A

LEGEND	
SCALE 0' 2 1/2' 5'	
⊗	MONITOR WELL LOCATION
⊕	SOIL BORING LOCATION
+	SOIL SAMPLE LOCATION
B B'	LINE OF CROSS-SECTION
8'	SAMPLE DEPTH (ft.)
(189.7)	TPH BY METHOD 5030 (mg/kg)
{103}	TPH BY METHOD 3550 (mg/kg)
<10 or <40	TPH NOT DETECTED
--100--	TPH ISOCONCENTRATION LINE (ppm)
—40—	FINAL CLEANUP LEVEL BY 3550

SCALE: 1"=5'	TITLE: SOIL TPH MAP (WITH 3550 ISOCONS)	PROJECT: CAP	CLIENT: MELVIN YARBOROUGH GREENSBORO, NC	 LEGACY ENVIRONMENTAL SERVICES, INC. GREENSBORO, NORTH CAROLINA
DATE: 8/21/95	2205 OAK HILL DRIVE GREENSBORO, NC			
DWN.BY: KBM				
DWG.#: L94-181B				

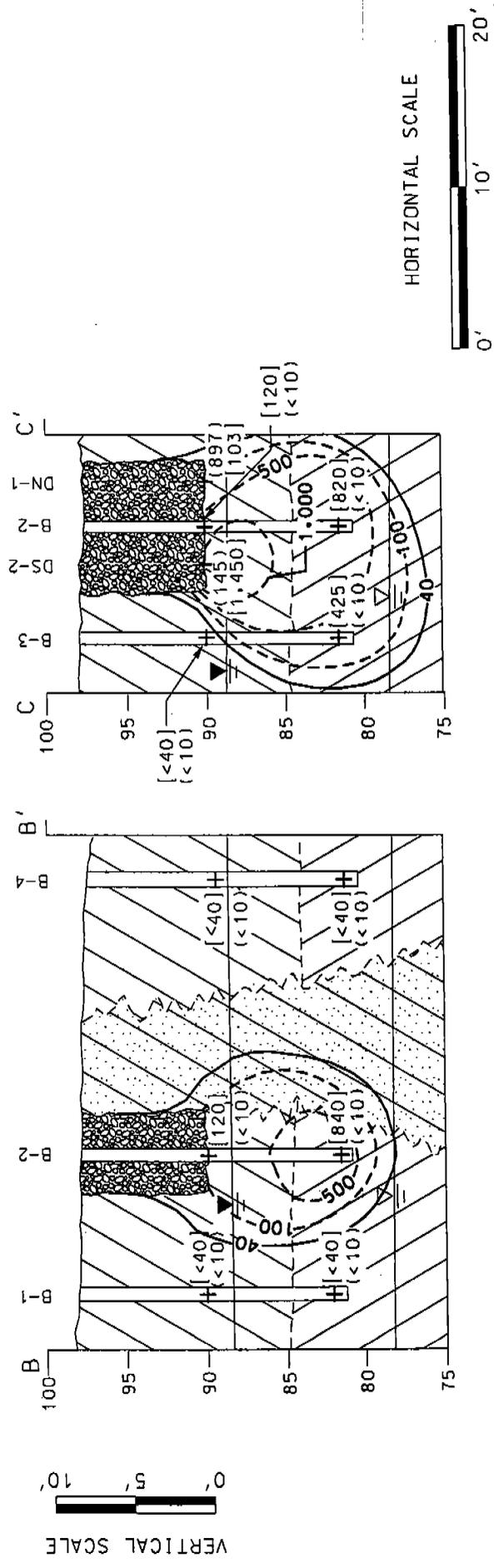


FIGURE 5

LEGEND

- DARK RED TO LIGHT REDDISH-BROWN SILTS WITH VARYING CLAY CONTENT
- RED-BROWN TO TAN-BROWN CLAYS WITH VARYING SILT CONTENT
- BROWN TO RED SILT WITH VARYING CLAY CONTENT AND VARYING AMOUNTS OF FINE AND MEDIUM GRAINED SAND
- BACKFILL
- ZONE OF GRADATIONAL CONTACT
- 100-- TPH ISOCNTRATION LINE BY METHOD 3550 (ppm)
- 40-- FINAL CLEANUP LEVEL BY METHOD 3550
- ESTIMATED WATER TABLE (AS MEASURED 12-13-94)
- ESTIMATED WATER TABLE (AS MEASURED 2-17-95)
- MONITOR WELL SCREENED INTERVAL
- SOIL SAMPLE LOCATION
- (89.7) TOTAL PETROLEUM HYDROCARBONS (TPH) BY METHOD 5030 (mg/kg)
- [103] TPH BY METHOD 3550 (mg/kg)
- [<40] TPH BY METHOD 3550 NOT DETECTED (mg/kg)

SCALE: 1"=10'	TITLE: SOIL CROSS SECTIONS B TO B' AND C TO C'	PROJECT: CAP 2205 OAK HILL DRIVE GREENSBORO, N.C.	CLIENT: MELVIN YARBOROUGH GREENSBORO, NC	 LEGACY ENVIRONMENTAL SERVICES, INC. GREENSBORO, NORTH CAROLINA
DATE: 8/21/95				
DWN.BY: KBM				
DWG.#: L-95-181D				

OAK HILL DRIVE

DRIVEWAY

CARPORT

RESIDENCE

PORCH

GROUNDWATER DATA		
MW #	T. O. C. ELEVATION	WATER LEVEL
1	98.64	DRY
2	100.00	21.14
3	95.91	20.11
4	94.99	19.09

LEGEND

SCALE
0' 10' 20'

⊙ MONITOR WELL LOCATION

→ GROUNDWATER FLOW DIRECTION

—77— POTENTIOMETRIC CONTOUR LINE (f.t.) (75.90) GROUNDWATER ELEVATION (f.t.)

(78.86)
MW-2

MW-1

(75.80)
MW-3

(75.90)
MW-4

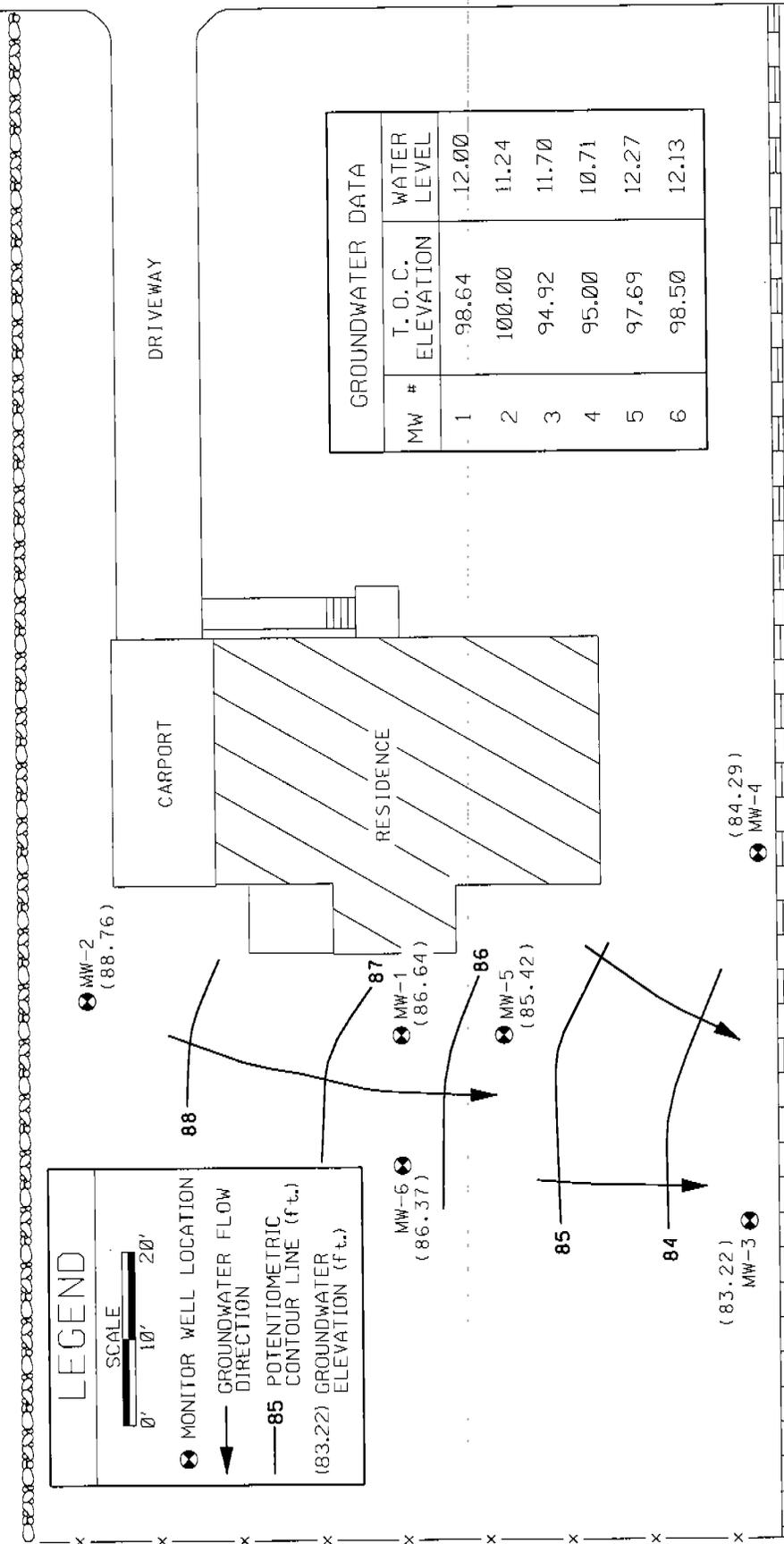
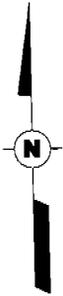
78

77

76



FIGURE 6



GROUNDWATER DATA		
MW #	T. O. C. ELEVATION	WATER LEVEL
1	98.64	12.00
2	100.00	11.24
3	94.92	11.70
4	95.00	10.71
5	97.69	12.27
6	98.50	12.13

FIGURE 6A

SCALE: 1"=20'
 DATE: 3/12/97
 DWN.BY: KBM
 DWG.# L97-131A

TITLE:
 POTENTIOMETRIC SURFACE MAP
 (AS MEASURED ON 2/24/97)

PROJECT:
 CAP
 2205 OAK HILL DRIVE
 GREENSBORO, N.C.

CLIENT:
 MELVIN YARBOROUGH
 GREENSBORO, NC



LEGACY
 ENVIRONMENTAL
 SERVICES, INC.
 GREENSBORO, NORTH CAROLINA

APPENDIX A
SLUG TEST DATA
AND ANALYSES

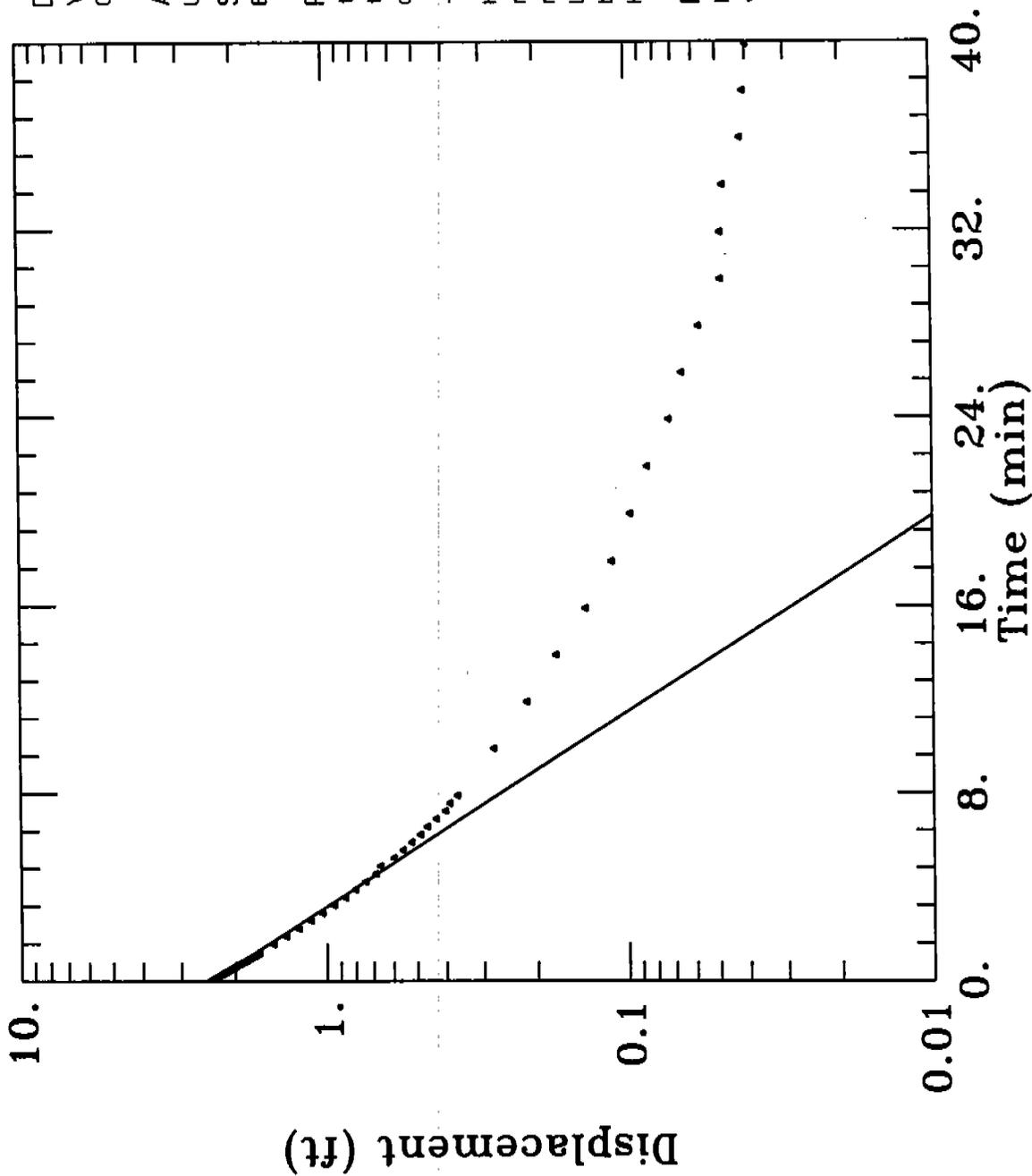
DATA SET:
YARB2.DAT
09/07/95

AQUIFER MODEL:
Unconfined
SOLUTION METHOD:
Bouwer-Rice

PROJECT DATA:
test date: AUGUST 18, 1995
test well: MW-4
obs. well: MW-4

TEST DATA:
H0 = 2.4 ft
rc = 0.08333 ft
rw = 0.25 ft
L = 10. ft
b = 25. ft
H = 16. ft

PARAMETER ESTIMATES:
K = 0.0002567 ft/min
y0 = 2.402 ft



residual = observed - calculated
 weighted residual = residual * weight

Weighted Residual Statistics:

Number of residuals..... 109
 Number of estimated parameters.... 2
 Degrees of freedom..... 107
 Residual mean..... 0.01291
 Residual standard deviation..... 0.04486
 Residual variance..... 0.002012

Model Residuals:

Time	Observed	Calculated	Residual	Weight
0.017	2.406	2.3906	0.015417	1
0.033	2.425	2.38	0.044959	1
0.05	2.414	2.3689	0.045108	1
0.067	2.405	2.3578	0.047205	1
0.083	2.391	2.3474	0.043601	1
0.1	2.382	2.3364	0.045598	1
0.117	2.365	2.3255	0.039542	1
0.133	2.344	2.3152	0.028797	1
0.15	2.338	2.3044	0.033642	1
0.167	2.325	2.2936	0.031437	1
0.183	2.313	2.2834	0.02955	1
0.2	2.305	2.2728	0.032247	1
0.217	2.293	2.2621	0.030893	1
0.233	2.278	2.2521	0.025868	1
0.25	2.269	2.2416	0.027418	1
0.267	2.257	2.2311	0.025919	1
0.283	2.241	2.2212	0.019756	1
0.3	2.232	2.2108	0.021162	1
0.317	2.217	2.2005	0.016518	1
0.333	2.208	2.1908	0.017221	1
0.35	2.201	2.1805	0.020484	1
0.367	2.186	2.1703	0.015698	1
0.383	2.177	2.1607	0.016268	1
0.4	2.163	2.1506	0.01239	1
0.417	2.155	2.1405	0.014464	1
0.433	2.141	2.1311	0.0099031	1
0.45	2.131	2.1211	0.0098861	1
0.467	2.112	2.1112	0.00082232	1
0.483	2.11	2.1019	0.0081315	1
0.5	2.102	2.092	0.0099776	1
0.517	2.083	2.0822	0.00077755	1
0.533	2.076	2.073	0.0029591	1
0.55	2.067	2.0633	0.0036701	1
0.567	2.051	2.0537	-0.0026643	1
0.583	2.042	2.0446	-0.0026087	1
0.6	2.031	2.035	-0.0040309	1
0.617	2.021	2.0255	-0.0044979	1
0.633	2.019	2.0166	0.0024335	1
0.65	2.004	2.0071	-0.00312	1
0.667	1.992	1.9977	-0.0057178	1
0.683	1.982	1.9889	-0.0069089	1
0.7	1.974	1.9796	-0.005592	1
0.717	1.966	1.9703	-0.0043187	1

0.733	1.948	1.9616	-0.013631	1
0.75	1.939	1.9524	-0.013441	1
0.767	1.929	1.9433	-0.014295	1
0.783	1.925	1.9347	-0.0097264	1
0.8	1.911	1.9257	-0.014663	1
0.817	1.898	1.9166	-0.018643	1
0.833	1.885	1.9082	-0.023191	1
0.85	1.867	1.8993	-0.032252	1
0.867	1.867	1.8904	-0.023356	1
0.883	1.857	1.882	-0.02502	1
0.9	1.848	1.8732	-0.025204	1
0.917	1.842	1.8644	-0.022429	1
0.933	1.83	1.8562	-0.026208	1
0.95	1.819	1.8475	-0.028512	1
0.967	1.81	1.8389	-0.028858	1
0.983	1.8	1.8307	-0.030749	1
1	1.791	1.8222	-0.031173	1
1.017	1.783	1.8136	-0.030638	1
1.033	1.773	1.8056	-0.03264	1
1.05	1.764	1.7972	-0.033182	1
1.067	1.754	1.7888	-0.034763	1
1.083	1.746	1.7809	-0.034876	1
1.1	1.737	1.7725	-0.035533	1
1.117	1.73	1.7642	-0.03423	1
1.133	1.723	1.7565	-0.033451	1
1.15	1.711	1.7482	-0.037223	1
1.167	1.703	1.74	-0.037033	1
1.183	1.693	1.7324	-0.03936	1
1.2	1.676	1.7242	-0.048245	1
1.217	1.678	1.7162	-0.038168	1
1.567	1.507	1.558	-0.051031	1
1.9	1.367	1.4211	-0.054123	1
2.233	1.243	1.2962	-0.053246	1
2.567	1.135	1.182	-0.047015	1
2.9	1.038	1.0781	-0.040148	1
3.233	0.95	0.98341	-0.033409	1
3.567	0.873	0.89675	-0.023747	1
3.9	0.807	0.81795	-0.010947	1
4.233	0.747	0.74607	0.00092773	1
4.567	0.689	0.68033	0.0086749	1
4.9	0.666	0.62054	0.045457	1
5.233	0.6	0.56601	0.033985	1
5.567	0.56	0.51613	0.043865	1
5.9	0.524	0.47078	0.053219	1
6.233	0.489	0.42941	0.059588	1
6.567	0.463	0.39157	0.071429	1
6.9	0.433	0.35716	0.075838	1
7.232	0.404	0.32587	0.078132	1
7.562	0.39	0.29748	0.092521	1
7.902	0.368	0.27081	0.097185	1
9.902	0.278	0.15587	0.12213	1
11.902	0.216	0.089714	0.12629	1
13.902	0.173	0.051636	0.12136	1
15.902	0.138	0.02972	0.10828	1
17.902	0.113	0.017106	0.095894	1
19.902	0.098	0.0098454	0.088155	1
21.902	0.086	0.0056667	0.080333	1
23.902	0.073	0.0032615	0.069738	1
25.902	0.066	0.0018772	0.064123	1
27.902	0.058	0.0010805	0.05692	1

APPENDIX B
SOIL REMEDIATION
COST ESTIMATE

ESTIMATED COST FOR REMEDIATION BY SOIL EXCAVATION

<u>DESCRIPTION</u>	<u>ESTIMATED # OF UNITS</u>	<u>UNIT COST</u>	<u>TOTAL</u>
Health & Safety Plan	1	\$500	\$ 500.00
Excavation Work Plan	1	\$850	\$ 850.00
Soil Disposal Plan	1	\$900	\$ 900.00
Field Supervision	2	\$600/day	\$ 1,200.00
Soil Analyses (5030/3550)	10	\$126.50/sample	\$1,265.00
Consultant Travel	80	\$1.75/mile	\$140.00
Site Closure Report	1	\$2,200	\$2,200.00
Soil Excavation (Est.)	250 tons	\$9.00/ton	\$2,250.00
Contractor Mobe (Est.)	1	\$500.00	\$500.00
Backfill & Placement(Est.)	250 tons	\$12.00/ton	\$3,000.00
Load, Haul, Disp (Est.)	250 tons	\$27.00/ton	\$6,750.00
Site Restoration	1	\$500.00	\$500.00
ESTIMATED TOTAL			\$20,055.00

The estimated cost for in-situ methods for comparative purposes is summarized below:

OPTION #1 - REMEDIATION BY SOIL VAPOR EXTRACTION

<u>DESCRIPTION</u>	<u>ESTIMATED # OF UNITS</u>	<u>UNIT COST</u>	<u>TOTAL</u>
Feasibility Testing	1	\$3,575.00	\$ 3,575.00
Design, Specify, Bid an SVE system	1	\$2,875.00	\$2,875.00
Install vapor wells (20' deep)	2	\$1,200.00	\$2,400.00
SVE System	1	\$4,000.00	\$4,000.00
System Installation	1	\$2,000.00	\$2,000.00
System Startup	1	\$2,200.00	\$2,200.00
Quarterly Monitoring & Report	8	\$1,500	\$12,000.00
Site Closure Report	1	\$2,200	\$2,200.00
ESTIMATED TOTAL			\$31,250.00

OPTION #2 - REMEDIATION BY SOIL BIO-VENTING

<u>DESCRIPTION</u>	<u>ESTIMATED # OF UNITS</u>	<u>UNIT COST</u>	<u>TOTAL</u>
Bio-Feasibility Testing	1	\$5,000.00	\$ 5,000.00
Design, Specify, Bid a Bio-venting system	1	\$2,875.00	\$2,875.00
Install vapor wells (20' deep)	2	\$1,200.00	\$2,400.00
Bio-venting System	1	\$2,000.00	\$2,000.00
System Installation	1	\$2,000.00	\$2,000.00
System Startup	1	\$2,200.00	\$2,200.00
Quarterly Monitoring & Report	12	\$1,500	\$18,000.00
ESTIMATED TOTAL			\$34,475.00

NOTE: Where possible, unit costs are based on proposed NC LPUST Trust Fund task rates.

Costs for post clean up monitoring will be estimated following CAP approval and monitoring requirements set forth by the NCDEHNR.

APPENDIX B
SOIL REMEDIATION
COST ESTIMATE

ESTIMATED COST FOR REMEDIATION BY SOIL EXCAVATION

<u>DESCRIPTION</u>	<u>ESTIMATED # OF UNITS</u>	<u>UNIT COST</u>	<u>TOTAL</u>
Health & Safety Plan	1	\$500	\$ 500.00
Excavation Work Plan	1	\$850	\$ 850.00
Soil Disposal Plan	1	\$900	\$ 900.00
Field Supervision	2	\$600/day	\$ 1,200.00
Soil Analyses (5030/3550)	10	\$126.50/sample	\$1,265.00
Consultant Travel	80	\$1.75/mile	\$140.00
Site Closure Report	1	\$2,200	\$2,200.00
Soil Excavation (Est.)	250 tons	\$15.00/ton	\$3,750.00
Contractor Mobe (Est.)	1	\$500.00	\$500.00
Backfill & Placement(Est.)	250 tons	\$12.00/ton	\$3,000.00
Load, Haul, Disp (Est.)	250 tons	\$27.00/ton	\$6,750.00
Site Restoration	1	\$1,500.00	\$1,500.00
ESTIMATED TOTAL			\$22,555.00

The estimated cost for in-situ methods for comparative purposes is summarized below:

OPTION #1 - REMEDIATION BY SOIL VAPOR EXTRACTION

<u>DESCRIPTION</u>	<u>ESTIMATED # OF UNITS</u>	<u>UNIT COST</u>	<u>TOTAL</u>
Feasibility Testing	1	\$3,575.00	\$ 3,575.00
Design, Specify, Bid an SVE system	1	\$2,875.00	\$2,875.00
Install vapor wells (20' deep)	2	\$1,200.00	\$2,400.00
SVE System	1	\$4,000.00	\$4,000.00
System Installation	1	\$2,000.00	\$2,000.00
System Startup	1	\$2,200.00	\$2,200.00
Quarterly Monitoring & Report	8	\$1,500	\$12,000.00
Site Closure Report	1	\$2,200	\$2,200.00
ESTIMATED TOTAL			\$31,250.00

OPTION #2 - REMEDIATION BY SOIL BIO-VENTING

<u>DESCRIPTION</u>	<u>ESTIMATED # OF UNITS</u>	<u>UNIT COST</u>	<u>TOTAL</u>
Bio-Feasibility Testing	1	\$5,000.00	\$ 5,000.00
Design, Specify, Bid a Bio-venting system	1	\$2,875.00	\$2,875.00
Install vapor wells (20' deep)	2	\$1,200.00	\$2,400.00
Bio-venting System	1	\$2,000.00	\$2,000.00
System Installation	1	\$2,000.00	\$2,000.00
System Startup	1	\$2,200.00	\$2,200.00
Quarterly Monitoring & Report	12	\$1,500	\$18,000.00
ESTIMATED TOTAL			\$34,475.00

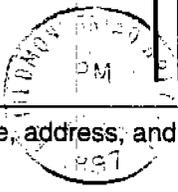
NOTE: Where possible, unit costs are based on proposed NC LPUST Trust Fund task rates.

Costs for post clean up monitoring will be estimated following CAP approval and monitoring requirements set forth by the NCDEHNR.

APPENDIX C

**PUBLIC NOTIFICATION
RECORDS**

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

Certified Mail / P 418 683 818 / Job #P-342
Legacy Environmental Services, Inc.
P.O. Box 4560
Greensboro, NC 27404



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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. J. Edward Kitchen Greensboro City Manager 301 North Eugene Street Greensboro, NC 27402-3136		4a. Article Number P 418 683 818	
		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
5. Received By: (Print Name)		7. Date of Delivery 3-19-94	
6. Signature: (Addressee or Agent) X <i>[Signature]</i>		8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

Certified Mail / P 418 685 801 / Job #P-342
Legacy Environmental Services, Inc.
P.O. Box 4560
Greensboro, NC 27404



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:

Adrian and Karen Newis
2207 Oak Hill Drive
Greensboro, NC 27408

4a. Article Number
P418 685 801

4b. Service Type

Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
3-26-97

5. Received By: (Print Name)

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

6.
PS

Thank you for using Return Receipt Service.

Receipt

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

Certified Mail / P 418 683 820 / Job #P-342
Legacy Environmental Services, Inc.
P.O. Box 4560
Greensboro, NC 27404



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:

Ms. Norma Brown
Little Mouse Playhouse Daycare
2903 Lawndale Drive
Greensboro, NC 27408

4a. Article Number

P 418 683 820

4b. Service Type

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

7. Date of Delivery

3-17-97

5. Received By: (Print Name)

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

6. Signature: (Addressee or Agent)

X

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

Certified Mail / P 418 683 821 / ~~Tab~~ #P-342
Legacy Environmental Services, Inc.
P.O. Box 4560
Greensboro, NC 27404

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. Robert Eastwood
2203 Oak Hill Drive
Greensboro, NC 27408

4a. Article Number

P 418 683 821

4b. Service Type

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

7. Date of Delivery

3-17-97

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X Robert L. Eastwood

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

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

Certified Mail / P 418 683 822 / Job #P-342
Legacy Environmental Services, Inc.
P.O. Box 4560
Greensboro, NC 27404



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. Harold Gabel
Guilford County Health Dept.
301 N. Eugene Street
Greensboro, NC 27401

4a. Article Number

P 418 683 822

4b. Service Type

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

7. Date of Delivery

3/17/97

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X Shirley Linnville

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

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.



LEGACY ENVIRONMENTAL SERVICES, INC.

P.O. Box 4560, Greensboro, NC 27404-4560, Phone (910) 316-0452, FAX (910) 299-1961

**CERTIFIED MAIL
ARTICLE NUMBER P 418 683 818
RETURN RECEIPT REQUESTED**

March 14, 1997

J. Edward Kitchen
Greensboro City Manager
P.O. Box 3136
Greensboro, NC 27402-3136

Reference: Notice concerning the request for a Corrective Action Plan (CAP) without the requirement to meet groundwater quality standards in 15A NCAC 2L 0.0202; and based on the natural processes of degradation and attenuation of contaminants
2205 Oak Hill Drive
Greensboro, North Carolina
DWQ Incident # 10017

Dear Mr. Kitchen,

This letter is being provided to inform you that the State's Division of Environmental Management is being requested to approve an environmental cleanup activity in your area. In accordance with North Carolina Statutes, a set of Groundwater Classifications and Standards has been put in place for the protection of all groundwaters across the state. Because your property is located adjacent to other properties that may be involved in groundwater cleanup, the law requires that you be informed of these activities.

Pursuant to the notification requirements of Title 15A NCAC 2L.0114(b), Legacy Environmental Services, Inc., an environmental consultant on behalf of Melvin Yarboro, is providing notice of the request for a corrective action plan under 15A NCAC 2L.0106(i). This property is located at 2205 Oak Hill Drive in Greensboro, NC.

Some of the constituents found at the above location are typical of fuel oil have been detected beneath this site in concentrations which exceed the Groundwater Quality Standards outlined in 15A NCAC 2L .0202 and action levels for soil contamination contained in "Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater (March 1997)". Legacy Environmental Services, Inc. believes that if the proposed Corrective Action Plan is approved by the Division of Water Quality, implementation will result in the following:

The proposed natural attenuation CAP protects the public health, environment, and adjacent property uses/values by remediating all secondary contaminant sources (contaminated soil). To cost-effectively ensure adequate protection of local groundwater resources, groundwater at the contaminant source will be remediated by natural processes of degradation and attenuation prior to contacting any receptors. All wells at the site will be monitored semi-annually for the first 2 years after soil remediation, then annually for three additional years.

Some additional reasons this CAP should be relied upon for restoration are as follows:

- 1.) Soil excavation and off-site disposal will remediate contaminated soils to NCDEHNR action levels. Soil sampling will be conducted following excavation to confirm removal of secondary sources.
- 2.) A monitor well network has been installed at the site which defines the contaminant plume and can be used to ensure that contaminant concentrations are being reduced at the plumes leading edges. This well network will also allow monitoring to ensure that contaminants do not leave property boundaries.
- 3.) Contaminant travel has been predicted with reasonable certainty and should not reach the nearest property line within 5 years once soil remediation is achieved. Degradation, dispersion, sorption, and retardation effects should ensure that contaminants will never cross property boundaries.

Any written comments concerning this request should be submitted within 30 days of *March 14, 1997* to the office of Ms. Sherri Knight, Groundwater Supervisor for the North Carolina Department of Environment, Health and Natural Resources in Winston-Salem, N.C. In addition, the Winston-Salem Regional Office has this proposed Corrective Action Plan with detailed site information on record for public perusal. You may make copies of the information obtained at a charge of 10 cents per page. Please send written comments and requests to examine this proposed Corrective Action Plan to the following address:

Ms. Sherri Knight
Winston-Salem Regional Office - DWQ
585 Waughtown Street
Winston-Salem, NC 27107

Sherrri Knight may be contacted during normal weekday working hours at 1 (910) 771-4600 to answer any and all questions pertaining to this request. Notification of this request for Corrective Action is also being made by certified mail to Mr. H.G. Gabel, Guilford County Health Department Director, and J. Edward Kitchen, Greensboro City Manager.

Sincerely,

A handwritten signature in cursive script that reads "Henry Nemargut".

Henry Nemargut, P.E.
Legacy Environmental Services, Inc.

L97-162A
cc. LES files P-342



LEGACY ENVIRONMENTAL SERVICES, INC.

P.O. Box 4560, Greensboro, NC 27404-4560, Phone (910) 316-0452, FAX (910) 299-1961

**CERTIFIED MAIL
ARTICLE NUMBER P 418 685 801
RETURN RECEIPT REQUESTED**

March 24, 1997

Adrian and Karen Newis
2207 Oak Hill Drive
Greensboro, NC 27408

Reference: Notice concerning the request for a Corrective Action Plan (CAP) without the requirement to meet groundwater quality standards in 15A NCAC 2L 0.0202
2205 Oak Hill Drive
Greensboro, North Carolina
DWQ Incident # 10017

Dear Mr. and Mrs. Newis,

This letter is being provided to inform you that the State's Division of Environmental Management is being requested to approve an environmental cleanup activity in your area. In accordance with North Carolina Statutes, a set of Groundwater Classifications and Standards has been put in place for the protection of all groundwaters across the state. Because your property is located adjacent to other properties that may be involved in groundwater cleanup, the law requires that you be informed of these activities.

Pursuant to the notification requirements of Title 15A NCAC 2L.0114(b), Legacy Environmental Services, Inc., an environmental consultant on behalf of Melvin Yarboro, is providing notice of the request for a corrective action plan under 15A NCAC 2L.0106(l). This property is located at 2205 Oak Hill Drive in Greensboro, NC.

Some of the constituents found at the above location are typical of fuel oil have been detected beneath this site in concentrations which exceed the Groundwater Quality Standards outlined in 15A NCAC 2L .0202 and action levels for soil contamination contained in "Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater (March 1997)". Legacy Environmental Services, Inc. believes that if the proposed Corrective Action Plan is approved by the Division of Water Quality, implementation will result in the following:

The proposed natural attenuation CAP protects the public health, environment, and adjacent property uses/values by remediating all secondary contaminant sources (contaminated soil). To cost-effectively ensure adequate protection of local groundwater resources, groundwater at the contaminant source will be remediated by natural processes of degradation and attenuation prior to contacting any receptors. All wells at the site will be monitored semi-annually for the first 2 years after soil remediation, then annually for three additional years.

Some additional reasons this CAP should be relied upon for restoration are as follows:

- 1.) Soil excavation and off-site disposal will remediate contaminated soils to NCDEHNR action levels. Soil sampling will be conducted following excavation to confirm removal of secondary sources.
- 2.) A monitor well network has been installed at the site which defines the contaminant plume and can be used to ensure that contaminant concentrations are being reduced at the plumes leading edges. This well network will also allow monitoring to ensure that contaminants do not leave property boundaries.
- 3.) Contaminant travel has been predicted with reasonable certainty and should not reach the nearest property line within 5 years once soil remediation is achieved. Degradation, dispersion, sorption, and retardation effects should ensure that contaminants will never cross property boundaries.

Any written comments concerning this request should be submitted within 30 days of *March 14, 1997* to the office of Ms. Sherri Knight, Groundwater Supervisor for the North Carolina Department of Environment, Health and Natural Resources in Winston-Salem, N.C. In addition, the Winston-Salem Regional Office has this proposed Corrective Action Plan with detailed site information on record for public perusal. You may make copies of the information obtained at a charge of 10 cents per page. Please send written comments and requests to examine this proposed Corrective Action Plan to the following address:

Ms. Sherri Knight
Winston-Salem Regional Office - DWQ
585 Waughtown Street
Winston-Salem, NC 27107

Sherri Knight may be contacted during normal weekday working hours at 1 (910) 771-4600 to answer any and all questions pertaining to this request. Notification of this request for Corrective Action is also being made by certified mail to Mr. H.G. Gabel, Guilford County Health Department Director, and J. Edward Kitchen, Greensboro City Manager.

Sincerely,

A handwritten signature in cursive script, appearing to read "Henry Nemargut".

Henry Nemargut, P.E.
Legacy Environmental Services, Inc.

L97-162B
cc. LES files P-342



LEGACY ENVIRONMENTAL SERVICES, INC.

P.O. Box 4560, Greensboro, NC 27404-4560, Phone (910) 316-0452, FAX (910) 299-1961

**CERTIFIED MAIL
ARTICLE NUMBER P 418 683 820
RETURN RECEIPT REQUESTED**

March 14, 1997

Norma Brown
Little Mouse Playhouse Daycare
2903 Lawndale Drive
Greensboro, NC 27408

Reference: Notice concerning the request for a Corrective Action Plan (CAP) without the requirement to meet groundwater quality standards in 15A NCAC 2L 0.0202
2205 Oak Hill Drive
Greensboro, North Carolina
DWQ Incident # 10017

Dear Ms. Brown,

This letter is being provided to inform you that the State's Division of Environmental Management is being requested to approve an environmental cleanup activity in your area. In accordance with North Carolina Statutes, a set of Groundwater Classifications and Standards has been put in place for the protection of all groundwaters across the state. Because your property is located adjacent to other properties that may be involved in groundwater cleanup, the law requires that you be informed of these activities.

Pursuant to the notification requirements of Title 15A NCAC 2L.0114(b), Legacy Environmental Services, Inc., an environmental consultant on behalf of Melvin Yarboro, is providing notice of the request for a corrective action plan under 15A NCAC 2L.0106(l). This property is located at 2205 Oak Hill Drive in Greensboro, NC.

Some of the constituents found at the above location are typical of fuel oil have been detected beneath this site in concentrations which exceed the Groundwater Quality Standards outlined in 15A NCAC 2L .0202 and action levels for soil contamination contained in "Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater (March 1997)". Legacy Environmental Services, Inc. believes that if the proposed Corrective Action Plan is approved by the Division of Water Quality, implementation will result in the following:

The proposed natural attenuation CAP protects the public health, environment, and adjacent property uses/values by remediating all secondary contaminant sources (contaminated soil). To cost-effectively ensure adequate protection of local groundwater resources, groundwater at the contaminant source will be remediated by natural processes of degradation and attenuation prior to contacting any receptors. All wells at the site will be monitored semi-annually for the first 2 years after soil remediation, then annually for three additional years.

Some additional reasons this CAP should be relied upon for restoration are as follows:

- 1.) Soil excavation and off-site disposal will remediate contaminated soils to NCDEHNR action levels. Soil sampling will be conducted following excavation to confirm removal of secondary sources.
- 2.) A monitor well network has been installed at the site which defines the contaminant plume and can be used to ensure that contaminant concentrations are being reduced at the plumes leading edges. This well network will also allow monitoring to ensure that contaminants do not leave property boundaries.
- 3.) Contaminant travel has been predicted with reasonable certainty and should not reach the nearest property line within 5 years once soil remediation is achieved. Degradation, dispersion, sorption, and retardation effects should ensure that contaminants will never cross property boundaries.

Any written comments concerning this request should be submitted within 30 days of *March 14, 1997* to the office of Ms. Sherri Knight, Groundwater Supervisor for the North Carolina Department of Environment, Health and Natural Resources in Winston-Salem, N.C. In addition, the Winston-Salem Regional Office has this proposed Corrective Action Plan with detailed site information on record for public perusal. You may make copies of the information obtained at a charge of 10 cents per page. Please send written comments and requests to examine this proposed Corrective Action Plan to the following address:

Ms. Sherri Knight
Winston-Salem Regional Office - DWQ
585 Woughtown Street
Winston-Salem, NC 27107

Sherri Knight may be contacted during normal weekday working hours at 1 (910) 771-4600 to answer any and all questions pertaining to this request. Notification of this request for Corrective Action is also being made by certified mail to Mr. H.G. Gabel, Guilford County Health Department Director, and J. Edward Kitchen, Greensboro City Manager.

Sincerely,

A handwritten signature in cursive script, appearing to read "Henry Nemargut".

Henry Nemargut, P.E.
Legacy Environmental Services, Inc.

L97-162C
cc. LES files P-342



LEGACY ENVIRONMENTAL SERVICES, INC.

P.O. Box 4560, Greensboro, NC 27404-4560, Phone (910) 316-0452, FAX (910) 299-1961

**CERTIFIED MAIL
ARTICLE NUMBER P 418 683 821
RETURN RECEIPT REQUESTED**

March 14, 1997

Robert Eastwood
2203 Oak Hill Drive
Greensboro, NC 27408

Reference: Notice concerning the request for a Corrective Action Plan (CAP) without the requirement to meet groundwater quality standards in 15A NCAC 2L 0.0202
2205 Oak Hill Drive
Greensboro, North Carolina
DWQ Incident # 10017

Dear Mr. Eastwood,

This letter is being provided to inform you that the State's Division of Environmental Management is being requested to approve an environmental cleanup activity in your area. In accordance with North Carolina Statutes, a set of Groundwater Classifications and Standards has been put in place for the protection of all groundwaters across the state. Because your property is located adjacent to other properties that may be involved in groundwater cleanup, the law requires that you be informed of these activities.

Pursuant to the notification requirements of Title 15A NCAC 2L.0114(b), Legacy Environmental Services, Inc., an environmental consultant on behalf of Melvin Yarboro, is providing notice of the request for a corrective action plan under 15A NCAC 2L.0106(l). This property is located at 2205 Oak Hill Drive in Greensboro, NC.

Some of the constituents found at the above location are typical of fuel oil have been detected beneath this site in concentrations which exceed the Groundwater Quality Standards outlined in 15A NCAC 2L .0202 and action levels for soil contamination contained in "Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater (March 1997)". Legacy Environmental Services, Inc. believes that if the proposed Corrective Action Plan is approved by the Division of Water Quality, implementation will result in the following:

The proposed natural attenuation CAP protects the public health, environment, and adjacent property uses/values by remediating all secondary contaminant sources (contaminated soil). To cost-effectively ensure adequate protection of local groundwater resources, groundwater at the contaminant source will be remediated by natural processes of degradation and attenuation prior to contacting any receptors. All wells at the site will be monitored semi-annually for the first 2 years after soil remediation, then annually for three additional years.

Some additional reasons this CAP should be relied upon for restoration are as follows:

- 1.) Soil excavation and off-site disposal will remediate contaminated soils to NCDEHNR action levels. Soil sampling will be conducted following excavation to confirm removal of secondary sources.
- 2.) A monitor well network has been installed at the site which defines the contaminant plume and can be used to ensure that contaminant concentrations are being reduced at the plumes leading edges. This well network will also allow monitoring to ensure that contaminants do not leave property boundaries.
- 3.) Contaminant travel has been predicted with reasonable certainty and should not reach the nearest property line within 5 years once soil remediation is achieved. Degradation, dispersion, sorption, and retardation effects should ensure that contaminants will never cross property boundaries.

Any written comments concerning this request should be submitted within 30 days of *March 14, 1997* to the office of Ms. Sherri Knight, Groundwater Supervisor for the North Carolina Department of Environment, Health and Natural Resources in Winston-Salem, N.C. In addition, the Winston-Salem Regional Office has this proposed Corrective Action Plan with detailed site information on record for public perusal. You may make copies of the information obtained at a charge of 10 cents per page. Please send written comments and requests to examine this proposed Corrective Action Plan to the following address:

Ms. Sherri Knight
Winston-Salem Regional Office - DWQ
585 Waughtown Street
Winston-Salem, NC 27107

Sherrri Knight may be contacted during normal weekday working hours at 1 (910) 771-4600 to answer any and all questions pertaining to this request. Notification of this request for Corrective Action is also being made by certified mail to Mr. H.G. Gabel, Guilford County Health Department Director, and J. Edward Kitchen, Greensboro City Manager.

Sincerely,

A handwritten signature in cursive script that reads "Henry Nemargut".

Henry Nemargut, P.E.
Legacy Environmental Services, Inc.

L97-162D
cc. LES files P-342



LEGACY ENVIRONMENTAL SERVICES, INC.

P.O. Box 4560, Greensboro, NC 27404-4560, Phone (910) 316-0452, FAX (910) 299-1961

**CERTIFIED MAIL
ARTICLE NUMBER P 418 683 822
RETURN RECEIPT REQUESTED**

March 14, 1997

Harold Gabel
Guilford County Health Department
301 North Eugene Street
Greensboro, NC 27401

Reference: Notice concerning the request for a Corrective Action Plan (CAP) without the requirement to meet groundwater quality standards in 15A NCAC 2L 0.0202
2205 Oak Hill Drive
Greensboro, North Carolina
DWQ Incident # 10017

Dear Mr. Gabel,

This letter is being provided to inform you that the State's Division of Environmental Management is being requested to approve an environmental cleanup activity in your area. In accordance with North Carolina Statutes, a set of Groundwater Classifications and Standards has been put in place for the protection of all groundwaters across the state. Because your property is located adjacent to other properties that may be involved in groundwater cleanup, the law requires that you be informed of these activities.

Pursuant to the notification requirements of Title 15A NCAC 2L.0114(b), Legacy Environmental Services, Inc., an environmental consultant on behalf of Melvin Yarboro, is providing notice of the request for a corrective action plan under 15A NCAC 2L.0106(1). This property is located at 2205 Oak Hill Drive in Greensboro, NC.

Some of the constituents found at the above location are typical of fuel oil have been detected beneath this site in concentrations which exceed the Groundwater Quality Standards outlined in 15A NCAC 2L .0202 and action levels for soil contamination contained in "Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater (March 1997)". Legacy Environmental Services, Inc. believes that if the proposed Corrective Action Plan is approved by the Division of Water Quality, implementation will result in the following:

The proposed natural attenuation CAP protects the public health, environment, and adjacent property uses/values by remediating all secondary contaminant sources (contaminated soil). To cost-effectively ensure adequate protection of local groundwater resources, groundwater at the contaminant source will be remediated by natural processes of degradation and attenuation prior to contacting any receptors. All wells at the site will be monitored semi-annually for the first 2 years after soil remediation, then annually for three additional years.

Some additional reasons this CAP should be relied upon for restoration are as follows:

- 1.) Soil excavation and off-site disposal will remediate contaminated soils to NCDEHNR action levels. Soil sampling will be conducted following excavation to confirm removal of secondary sources.
- 2.) A monitor well network has been installed at the site which defines the contaminant plume and can be used to ensure that contaminant concentrations are being reduced at the plumes leading edges. This well network will also allow monitoring to ensure that contaminants do not leave property boundaries.
- 3.) Contaminant travel has been predicted with reasonable certainty and should not reach the nearest property line within 5 years once soil remediation is achieved. Degradation, dispersion, sorption, and retardation effects should ensure that contaminants will never cross property boundaries.

Any written comments concerning this request should be submitted within 30 days of *March 14, 1997* to the office of Ms. Sherri Knight, Groundwater Supervisor for the North Carolina Department of Environment, Health and Natural Resources in Winston-Salem, N.C. In addition, the Winston-Salem Regional Office has this proposed Corrective Action Plan with detailed site information on record for public perusal. You may make copies of the information obtained at a charge of 10 cents per page. Please send written comments and requests to examine this proposed Corrective Action Plan to the following address:

Ms. Sherri Knight
Winston-Salem Regional Office - DWQ
585 Waughtown Street
Winston-Salem, NC 27107

Sherri Knight may be contacted during normal weekday working hours at 1 (910) 771-4600 to answer any and all questions pertaining to this request. Notification of this request for Corrective Action is also being made by certified mail to Mr. H.G. Gabel, Guilford County Health Department Director, and J. Edward Kitchen, City Manager.

Sincerely,

A handwritten signature in black ink, appearing to read "Henry Nemargut". The signature is written in a cursive style with a long horizontal stroke at the end.

Henry Nemargut, P.E.
Legacy Environmental Services, Inc.

L97-162E
cc. LES files P-342

P 418 683 818

J. Edward Kitchen
City Manager

P 418 683 820

Norma Brown
2903 Lawndale Drive

P 418 683 821

Robert Eastwood
2203 Oak Hill Drive

P 418 683 822

H.D. Gabel
GCHD Director

P 418 683 801

Adrian Newis
2207 Oak Hill Drive