

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

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary



**DIVISION OF ENVIRONMENTAL
MANAGEMENT
GROUNDWATER SECTION**

May 7, 1996

CERTIFIED MAIL P 512 542 985
RETURN RECEIPT REQUESTED

Lindley Property Trust
ATTN: M. Cope Livingston, Trustee
P.O. Box 35681
Greensboro, NC 27425-5681

Subject: ARA/Smith's, 6301 Burnt Poplar Road, Greensboro, Guilford County, NC,
Groundwater Incident # 10077, Site Priority Ranking 70/D

Dear Mr. Livingston:

This office has received the Corrective Action Plan (CAP) prepared under 15A NCAC 2L .0106(l) for Lindley Property Trust for the referenced site by Pyramid Environmental, Inc. The review of the CAP can not be completed until additional information is provided. The following additional information is requested:

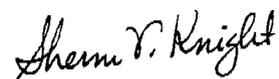
- (1) The CAP must document that conditions **at the subject site** are conducive to natural remediation processes and should present any evidence that natural attenuation is occurring at the site. Site specific evidence should be presented. Site specific parameters, such as the low hydraulic conductivity at this site, and their effect on natural remediation should be discussed.
- (2) In order to be granted approval to remediate any site by natural attenuation processes, it must be demonstrated that the contaminants in question can be remediated to 15 NCAC 2L .0202 standards within an acceptable period of time. Modeling information is presented for total BTEX, rather than the individual constituents for which standards exist. The benzene at the site is of particular interest and should be modeled.
- (3) Documentation that groundwater in the area of the plume has not been identified for future use or development by a state or local government planning process must be included in the CAP.

- (4) Monitor wells must include one or more well(s) placed in the zone defined to be no further down gradient from the current leading edge of the plume than the distance groundwater is expected to travel in five years. It must be demonstrated that the existing and proposed wells meet this criterion. A monitoring well to replace the former MW-5 should be installed. Also, MW-7 should be surveyed and the water level elevation data should be incorporated into the potentiometric surface map.
- (5) If roads or highways are located adjacent to the property containing the plume, the DOT or local government authority maintaining ownership or easement must be notified pursuant to 15A NCAC 2L .0114(b).
- (6) A monitoring plan including sample locations, sampling frequency, parameters to be monitored and analytical methods must be provided. Natural attenuation sites will generally be monitored quarterly for the first year, followed by less frequent monitoring.
- (7) A schedule including specific time frames for implementation and operation of the proposed CAP must be provided.

After this information is received, review of the CAP will be completed. See the current *Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater* for guidance on the requirements for Corrective Action Plans. For further information on natural attenuation CAPs, please see the *15A NCAC 2L Implementation Guidance* (11/5/95).

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

Sincerely,



Sherri V. Knight
Groundwater Supervisor

cc: Guilford County Health Department
WSRO

PS Form 3800, April 1995

US Postal Service
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Request additional info. for LICAP: 6301 Burnt Poplar Rd

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- Complete items 3, and 4a & b.
- 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):

- Addressee's Address
 - Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:

Lindley Property Trust
ATTN: M. Cope Livingston, Trustee
P.O. Box 35681
Greensboro, NC 27425-5681
LINDLEY PROPERTY TRUST
BY: [Signature]

4a. Article Number

P 512 542 985

4b. Service Type

- Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery

5/1/96

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

6. Signature (Agent)

PS Form 3811, December 1991 U.S. EPO: 1993-382-714 **DOMESTIC RETURN RECEIPT**

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