

MAY 12 1993

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Mr. Larry D. Coble
Regional Supervisor
Groundwater Section, DEM
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8025 North Point Boulevard, Suite 100
Winston-Salem, NC 27106-3203

ARA/Smith's

**RE: 6301 Burnt Poplar Road, Greensboro, Guilford County, NC - Notice of Violation
dated April 22, 1993**

Dear Mr. Coble:

This letter constitutes the required fifteen day response to the above-referenced Notice of Violation. The date for response was extended to today by Waddell Watters of your office.

While the landowner, whom I represent, has reserved all rights against the tenant, Gate City Truck Repair, the landowner currently intends to conduct the following activities to insure compliance with the 2L standards:

1. The landowner has already taken immediate action through its environmental consultant, Shield Environmental Associates, Inc. ("Shield"), Charlotte, NC, to terminate and control the discharge by removing the apparent source underground storage tanks. Shield found no liquid phase or free product. Shield conducted initial abatement measures by inspecting the site, preventing further releases, monitoring the site, stockpiling approximately 200 cubic yards of the affected soil on site and by otherwise complying with the provisions of 40 CFR §280.62.

2. Shield has analyzed information about the demographic conditions surrounding the subject site. The subject site is located in an industrial area of Guilford County that includes Ashland Oil, Colonial Pipeline, West Brothers Trucking and Plantation Pipeline Company. The groundwater flows in a general southerly direction. There is a small surface water body indicated approximately 1/4 mile west

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of the subject site. There is one water well, approximately one-quarter mile to the west of the site. It is unclear whether this well is a drinking water source. In any event, Shield has preliminarily indicated that the UST release from the subject site has not impacted this well. Further testing is planned.

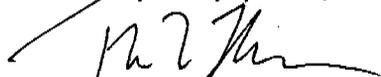
3. Shield has recommended the installation and sampling of three shallow groundwater monitoring wells surrounding the UST excavation areas; disposal of the stockpiled soils at a brick kiln or a permitted land farm facility; rising head test on the three monitoring wells to determine an average permeability of the soils at the site; and a survey of the top of the casing elevations of the monitoring wells to definitely determine groundwater flow direction and gradient. After the completion of these on-site work activities and receipt of laboratory analytical results, Shield recommends preparation of a groundwater assessment report, which will include soil boring logs, well construction records and schematics, calculations of soil permeability, survey results, water quality data and conclusions and recommendations as to the completeness of the groundwater assessment.

Subject to financial capability, the landowner intends to follow Shield's recommendations and is currently discussing this further recommended work with Shield.

The landowner desires to make known its intention to claim the full benefit of reimbursement from the commercial leaking underground storage tank trust fund and would request copies of the appropriate application forms.

Should you need any further information, please do not hesitate to contact the undersigned.

Very truly yours,



Thomas W. Brawner

TWB/naf

cc: Mr. H. Burt Brown