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11 May 1993

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Via Telefax (919) 896-7005

Mr. Larry J. Collier

Regional Supervisor

Groundwater Protection Unit

Department of Environment, Health and Natural Resources

8025 North Salisbury Road, Suite 100

Winston-Salem, NC 27157

RE: 6309 North Salisbury Road, Greensboro, Guilford County, NC - Notice of Violation
dated April 22, 1993

Dear Mr. Collier:

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. The water well, approximately one-quarter mile to the west of the stockpile, is not to be drilled until it is determined whether this well is a drinking water source. In any event, Shield has advised that the UST release from the subject site has not impacted the well. Further monitoring is planned.

Shield is recommending the installation and sampling of three shallow groundwater monitoring wells, including the UST excavation area; disposal of the stockpile; a permeability test of the underlying hard farm facility; rising head test on the three upper monitoring wells; and an average permeability of the soils at the site; and a soil boring log to determine the elevations of the monitoring wells to definitely determine their depth and orientation. After the completion of these on-site analytical results, Shield recommends a final report, which will include soil boring logs, permeability calculations of soil permeability, survey data and site and recommendations as to the next steps.

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

The landowner is planning to file a claim for reimbursement to claim the full benefit of reimbursement from the commercial liability 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