

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

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
Leesha Fuller, Regional Manager



Division of Environmental Management  
Groundwater Section

June 24, 1993

**CERTIFIED MAIL P-536 304 129**  
**RETURN RECEIPT REQUESTED**

William O. Cordes, Registered Agent  
Draper Corporation  
5644 Hornaday Road  
Greensboro, NC 27409

**SUBJECT: Comprehensive Site Assessment for Draper Corporation, 5644 Hornaday Road, Greensboro, Guilford County, North Carolina**

Dear Mr. Cordes:

The subject report has been reviewed by this office. Several questions remain about the assessment of the 30,000 gallon fuel oil UST area. Please have your consulting firm address our concerns that will follow.

Sample results for MW-8 are located in the report. These results show that 22 ppb of cis - 1,2 dichloroethene was discovered. The report does not mention this. Please provide information on this. Also, Mrs. Kelly Gage had requested a complete set of boring logs and monitor well construction records on numerous occasions, and a site diagram showing the location of each well. Please provide these to this office by no later than 15 days after receipt of this letter.

The screening of the various monitor wells seems to be inappropriate. In your March 8, 1993, "Report of Findings," it was stated that during the installation of MW-6, groundwater was encountered at a depth of 9.87 feet. The well was, then, screened from a depth of 10 to 20 feet below the top. If the purpose of this well is to detect "floaters," then how will this be accomplished. Keep in mind that the groundwater table level may rise or fall during any period; the screening of the wells must take this into account. Also, explain the screening of MW-2, MW-13 and MW-14.

The assessment of the groundwater contamination seems incomplete. By analyzing your figures, it appears that MW-2, MW-6, MW-14 and MW-7, are located at the edge of the plume as defined by the soil contamination. No monitor wells are placed in the heart of the plume where it is most likely to have affected the groundwater. And, as mentioned previously, the installed wells may or may not be screened properly to find the suspected contaminants.

The water supply well mentioned in your report, must be abandoned as required in 15 NCAC 2C, "Criteria and Standards Applicable to Water Supply and Certain Other Wells."

In regards to your June 4, 1993, letter to Mrs. Gage, your consulting firm must address the various options available for the remediation of the **soils and groundwater**. After choosing a remediation method, the firm must demonstrate that the chosen method will remediate the **entire plume**. If air sparging is the chosen method, then it must be shown that the two (2) air sparging wells are sufficient. A complete and thorough Corrective Action Plan (CAP) is necessary. A deadline of sixty days after receipt of this letter is set for this CAP. The questions raised by this office concerning the CSA should be addressed prior to completing the CAP. Submit in writing a letter that addresses our concerns within 15 days of receipt of this letter.

This office views this site as having two incidents; the former 30,000 gallon #4 fuel oil area, and the known **groundwater contamination**. The deadline for the CSA for the **groundwater contamination** is July 19, 1993, and the deadline for its corresponding CAP is 60 days after receipt of the CSA or by September 17, 1993; whichever is earliest.

Should you have any questions, I may be reached at the letterhead address or phone number.

Sincerely,



Richard Sieg  
Environmental Engineer

cc: WSRO Files - Draper Corporation  
Guilford County Department of Emergency Services  
C. Denny Walker - Draper Corporation

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William O. Cordes, Reg. Agent  
Draper Corporation  
5644 Hornaday Road  
Greensboro, NC 27409

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P-536 304 129

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Michael W. Draper 6/28/93

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PS Form 3811, December 1991

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