

File Code 4

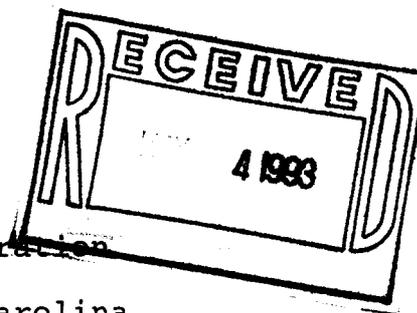


**DRAPER CORPORATION**  
Corporate Offices

Post Office 18100  
Greensboro, NC 27419  
(919) 852-4200

April 30, 1993

Ms. Kelly C. Gage  
Guilford County Emergency Services  
P.O. Box 18807  
Greensboro, North Carolina 27419



Re: Reply to NOV; Issued to Draper Corporation  
5644 Hornaday Road  
Greensboro, Guilford County, North Carolina

Dear Ms. Gage:

Attached please find a copy of the Notice of Violation (NOV) issued to Draper Corporation. This Notice of Violation was issued by the Winston-Salem Office on April 14, 1993 and received by me on April 16, 1993. Draper Corporation appreciates your cooperation concerning our efforts to address the requirements of the Notice of Violation and subsequent Comprehensive Site Assessment.

Attached is the work plan to more fully assess the UST situation. We have greatly accelerated our efforts to comply with your requirements. We have installed two (2) more monitoring wells around the excavation to assess potential groundwater impact and have installed multiple soil borings to aid in the delineation of the soil contamination. Samples from these have been submitted to a contract laboratory for analysis. We will make every effort to meet your May 10, 1993 target date for a more complete Comprehensive Site Assessment. If an extension of time beyond May 10, is necessary, as George and I discussed with you Wednesday, I will let you know.

We look forward to working with you concerning the remediation of this situation and appreciate your input with respect to the most appropriate and effective Corrective Action Plans.

Respectfully,

  
Denny Walker  
Draper Corporation

CDW/jm  
Encl.

cc: Mr. Larry D. Coble, Regional Supervisor  
Ms. Sherri V. Knight, Regional Groundwater Supervisor  
Mr. George House - Brooks, Pierce, McLendon Law Firm  
Mr. Steve Johnson - Triad Environmental

PROPOSED WORK PLAN FOR DRAPER IN RESPONSE TO NOV - 2N VIOLATIONS

DRAPER CORPORATION  
5644 HORNADAY ROAD  
GREENSBORO, NORTH CAROLINA

- I. Assess the soil contamination.
  - o Collect additional soil samples from excavation.
  - o Drill around periphery of excavation to determine if contamination extends beyond excavation area. (Collect soil samples @ 5 foot intervals, use Organic Vapor Analyzer to provide field evaluation, make detailed soil descriptions for boring logs).
  - o Submit soil samples for analysis by EPA Method 9071.
  
- II. Assess potential for groundwater contamination.
  - o Install additional groundwater monitoring wells around excavation area.
  - o Measure water levels from monitoring well MW-6, and newly installed wells to determine groundwater flow in former UST area.
  - o Resample well MW-6, along with sampling newly installed monitoring wells.
  - o Submit groundwater samples for analysis by EPA Method 625.
  
- III. Summarize soil and water sample data into report following North Carolina Department of Environmental Management (NCDEM) Comprehensive Site assessment (CSA) format.



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

NOTICE OF VIOLATION OF SUBCHAPTER 2N  
CRITERIA AND STANDARDS APPLICABLE TO  
UNDERGROUND STORAGE TANKS

April 14, 1993

CERTIFIED MAIL NUMBER P 131 598 025  
RETURN RECEIPT REQUESTED

Draper Corporation  
Attn: Denny Walker  
5644 Hornaday Rd.  
Greensboro, NC 27409

*WDC  
4-16-93*

SUBJECT: Draper Corporation, 5644 Hornaday Rd., Greensboro,  
Guilford County, NC

Dear Mr. Walker:

On March 9, 1993, this office determined that an underground storage tank system (UST) at the subject location is not in compliance with North Carolina Administrative Code (NCAC Title 15A Subchapter 2N "Criteria and Standards Applicable to Underground Storage Tanks"). It is our understanding that you and/or your firm are the owner/operator of the UST System. If you feel that you are not responsible for the following violations, please notify this office within seven (7) working days.

The violation(s) is(are) as follows:

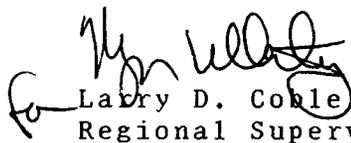
Failure to completely perform and/or report the initial site characterization (aka 45-day report) as outlined in 15A NCAC 2N .0704 within the time frame stated in the NORR of December 30, 1992. Upon receipt of this notice you must file a report with this office addressing all the requirements of section 15A NCAC 2N .0704 by May 10, 1993.

Failure to conduct and/or report the investigation for soil and ground-water clean-up (aka Comprehensive Site Assessment) as outlined in 15A NCAC 2N .0706 within the time frame stated in the NORR of December 30, 1992. Upon receipt of this notice you must file a report addressing all the requirements of section 15A NCAC 2N .0706 by May 10, 1993.

Failure to comply with any of the aforementioned criteria and standards may result in enforcement action against you which may include: (1) a civil penalty assessment of up to \$10,000 for each day of continuing violation (G.S. 143-215.6), (2) criminal penalty proceedings under circumstance as outlined under G.S. 143-215.6B, (3) referral of your site to the Federal Trust Fund which must seek cost recovery from responsible parties for any and all expenses incurred, (4) a request to the Attorney General to institute an action for injunctive relief and, (5) the issuance of a special order.

It is your responsibility to comply with these criteria and standards. Copies of 15A NCAC 2N are available at this office. Should you have questions concerning the notice or the requirements of the criteria and standards, please contact Kelly C. Gage at P.O. Box 18807, Greensboro, NC 27419 or telephone (919) 373-7565.

Sincerely,

  
Larry D. Coble  
Regional Supervisor

cc: Office of Attorney General  
Incident Management Unit  
WSRO Files  
Guilford County Emergency Services  
Guilford County Emergency Management