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DuPont Engineering

January 16, 2012

Ms. Charlotte V. Jesneck, Head
NCDENR Inactive Hazardous Site Branch
1646 Mail Service Center
Raleigh, NC 27699-1646

Re: Clayton Farms – Clayton, Johnston County

Dear Ms. Jesneck,

I am writing in response to a letter sent to us dated December 13, 2011 in which the Clayton Farms Site, located in Clayton, Johnston County was ranked No. 38 on the North Carolina Inactive Hazardous Waste Sites Priority List ("The List"). DuPont does not understand how a site with very low levels of commonly used pesticides in soil and groundwater was ranked at such a high level. Particularly in light of the fact that there is currently no exposure to the small area of soil contamination and no one is using the groundwater in the area as drinking water.

In early 2011 DuPont performed another round of soil and groundwater sampling at the Site. The results of this investigation show that the area of soils contaminated with pesticides has been delineated. The data also show a handful of pesticides sporadically detected in groundwater at concentrations expected throughout eastern North Carolina related to decades of area wide use. This data was shared with your office via e-mail to Mr. Kim Caulk dated June 2, 2011. Note that there is currently no one using the property nor the groundwater at this Site.

DuPont is currently negotiating with the City of Clayton to transfer title of the property to be used to expand the City's recreational area. DuPont has already agreed to clean up the known soil contamination area. We are anticipating working through the Brownfield Program to complete remediation and ensure that the property is used in a way that is protective of people and the environment. In order to move forward with the City of Clayton and the Brownfield Program, we need to have a clearer understanding as to why the site is ranked so high on The List and how remediation of the soils would impact this ranking.

Please call or e-mail me at 704-643-0776 (Kevin.P.Garon@usa.DuPont.com) to discuss this site in further detail. We would like to accommodate the needs and desire of the City of Clayton while ensuring that we are fulfilling our regulatory requirements with NCDENR.

Respectfully submitted,

A handwritten signature in black ink that reads "Kevin P. Garon".

Kevin P. Garon