



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

CERTIFIED MAIL

Return Receipt Requested

February 21, 2012

Mr. Roger Francis
OE Enterprises
348 Elizabeth Brady Road
Hillsborough, NC 27278

RE: Former Annedeem Hosiery Building
717 North Park Avenue
Burlington, NC
Site No. NONCD 0002885

Dear Mr. Francis:

This letter is written to solicit your further cooperation in monitoring, testing, analyzing and reporting on a site located at 717 North Park Avenue in Burlington, North Carolina (the Site). The North Carolina Department of Environment and Natural Resources' Division of Waste Management (Division) has determined that there is a release, or substantial threat of a release into the environment of a hazardous substance from the Site. Based on the information submitted in the ECS, LLP Limited Soil and Groundwater Investigation Report and the Site Cleanup Questionnaire, the Division considers the Site to be a high priority for assessment. Areas of concern include the potential presence of nearby wells, offsite migration of vapors, vapor intrusion into adjacent residences, and characterization and delineation of the subsurface contaminant plume. The ECS, LLP Limited Soil and Groundwater Investigation Report dated August 1, 2011 provided to the Division is missing page 4 – "Conclusions and Recommendations" and "Qualifications." It would be appreciated if this missing page would be supplied with the information requested below.

In light of these facts, the Division requests that you conduct a remedial investigation to address further information needs prior to determination of site suitability for the Registered Environmental Consultant (REC) Program. Within ninety (90) days of your receipt of this letter, please submit a draft Remedial Investigation Plan (Plan) that complies with the current *Inactive Hazardous Sites Branch Guidelines for Assessment and Cleanup* (<http://portal.ncdenr.org/web/wm/sf/sfavailabledocs>). The draft Plan must be organized in sections corresponding to the following items and include:

1. Site information including identification of previous owners and current and historic use of the site and surrounding property.
2. Inventory and map of all wells, springs, and surface-water intakes used as sources of water within one-half mile radius of the center of the Site.

3. Operational history with aerial photographs and Sanborne Fire Insurance maps to support land-use history.
4. Site environmental permit history, including all federal, state, and local environmental permits, past and present, issued to or within OE Enterprises's custody or control. OE Enterprises shall provide copies of any such permits upon request by the Division.
5. A summary of all previous and ongoing environmental investigations and environmental regulatory involvement with the Site, and copies of all associated reports and laboratory data.
6. Proposed procedures for characterizing site geologic and hydrogeologic conditions and identifying and delineating each contamination source as to each affected environmental medium, including any plan for special assessment such as a geophysical survey.
7. Proposed methods, locations, depths of, and justification for, all sample collection points for all media sampled, including monitoring well locations and anticipated screened intervals.
8. Proposed field and laboratory procedures for quality assurance/quality control.
9. Proposed analytical parameters and analytical methods for all samples.
10. A contact name, address and telephone number for the principal consultant and laboratory, and qualifications and certifications of all consultants, laboratories and contractors expected to perform work in relation to this Plan. Any laboratory retained must currently be either certified to analyze applicable certifiable parameters under Title 15A of the North Carolina Administrative Code, Subchapter 2H, Section .0800, or be a contract laboratory under the EPA Contract Laboratory Program.
11. Equipment and personnel decontamination procedures.
12. A proposed schedule for site activities and reporting.
13. Any other information considered relevant by the remediating party.
19. A signed and notarized certification by a company official with the express authority to bind the company stating: "I certify that, to the best of my knowledge, after thorough investigation, the information contained in or accompanying this certification is true, accurate, and complete."
20. A signed and notarized certification by the consultant responsible for the day to day remedial activities stating: "I certify that, to the best of my knowledge, after thorough investigation, the information contained in or accompanying this certification is true, accurate, and complete."
21. If the Plan includes any work that would constitute the "practice of engineering" as defined by N.C.G.S. § 89C, the signature and seal of a professional engineer is required. If the Plan includes any work that would constitute the "public practice of geology" as defined by N.C.G.S. § 89E, the signature and seal of a licensed geologist is required.

The Division will notify Mr. Roger Francis of OE Enterprises of any changes needed in the Plan and of the time within which the changes must be made. OE Enterprises may not implement the Plan until it is approved in writing by the Division. Any desired modifications to the approved Plan or work schedule must be

approved by the Division prior to implementation. OE Enterprises or their designated Consultant must notify the Division no less than ten (10) days prior to any field activity.

Following completion of the remedial investigation, OE Enterprises must provide a Remedial Investigation Report (Report) documenting implementation of the approved Plan. The Report must be organized in sections corresponding to the following items and include:

1. A narrative description of how the remedial investigation was conducted, including a discussion of any variances from the approved Plan.
2. A description of groundwater monitoring well design and installation procedures, including well drilling methods used, completed drilling logs, "as built" drawings of all monitoring wells, well construction techniques and materials, geologic logs, and copies of all well installation permits.
3. A map, drawn to scale, showing all soil, surface water and sediment sample locations and monitoring well locations in relation to known disposal areas or other sources of contamination. Monitoring wells must be surveyed to a known benchmark. Soil sample locations must be surveyed to a known benchmark or flagged with a secure marker until after the remedial action is completed. Monitoring well locations and elevations must be surveyed by a Professional Land Surveyor.
4. A description of all laboratory quality assurance and quality control procedures followed during the remedial investigation.
5. A description of procedures used to manage drill cuttings, purge water and decontamination water.
6. A summary of site geologic conditions, including a description of soils and vadose zone characteristics.
7. A descriptions of site hydrogeologic conditions (if hazardous substances have been detected in groundwater), including current uses of groundwater, notable aquifer characteristics, a water table elevation contour map with groundwater flow patterns depicted, tabulated groundwater elevation data, and a description of procedures used for measuring water levels.
8. Tabulation of analytical results for all sampling (including sampling dates and soil sampling depths) and copies of all laboratory reports (including QA/QC support data referenced to specific samples).
9. Soil, groundwater, surface water and sediment contaminant delineation maps and cross sections, including scale and sampling points with contaminant concentrations.
10. A description of procedures and the results of any special assessments such as geophysical surveys, immunoassay testing (EPA SW-846 4000 series methods), soil gas surveys, or test pit excavations.
11. Copies of all field logs and notes, and, where available, color copies of site photographs.
12. A demonstration, supported by sampling data, that the areal and vertical extent of hazardous substance contamination in each affected medium has been delineated to the satisfaction of the Division in accordance with the current version of the Division's *Inactive Hazardous Sites Branch Guidelines for Assessment and Cleanup*.
13. If groundwater contamination exists at the Site, an inventory and map of all wells, springs, and surface-water intakes used as sources of water within on-half mile radius of the center of the Site.

14. Any other information considered relevant by the remediating party.
15. A signed and notarized certification by a company official with the express authority to bind the company stating: "I certify that, to the best of my knowledge, after thorough investigation, the information contained in or accompanying this certification is true, accurate, and complete."
16. A signed and notarized certification by the consultant responsible for the day to day remedial activities stating: "I certify that, to the best of my knowledge, after thorough investigation, the information contained in or accompanying this certification is true, accurate, and complete."
17. If the Plan includes any work that would constitute the "practice of engineering" as defined by N.C.G.S. § 89C, the signature and seal of a professional engineer is required. If the Plan includes any work that would constitute the "public practice of geology" as defined by N.C.G.S. § 89E, the signature and seal of a licensed geologist is required.

The Division will notify Mr. Roger Francis of OE Enterprises of any changes needed in the remedial investigation or the Report due to any hazard posed by the Site or discrepancies with the approved Remedial Investigation Plan, and of the time within which changes must be made. When the Division determines that the remedial investigation is complete, the Division will notify OE Enterprises in writing.

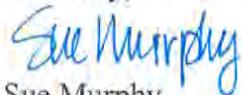
All documents submitted to the Division in relation to this work must be provided in both paper and in an electronic format designated by the Division (see the Inactive Hazardous Sites Branch website located at <http://portal.ncdenr.org/web/wm/sf/ihs/home> for current specifications on electronic document submittal) and sent to:

Sue Murphy
Inactive Hazardous Sites Branch
North Carolina Department of Environment and Natural Resources
1646 Mail Service Center
Raleigh, NC 27699-1646

To protect public health and the environment, the Division has the authority under N.C.G.S. § 130A-310.1(c) to order any responsible party to conduct such monitoring, testing, analyses and reporting as deemed reasonable and necessary to ascertain the nature and extent of any hazard posed by a Site. However, prior to issuing remedial investigation orders, the Division sends letters such as this to offer responsible parties the opportunity to work cooperatively with the Division.

This offer shall expire at the close of business on the 30th day following your receipt of this letter, so please notify the Division, in writing, if OE Enterprises intends to comply with our request. If you have any questions, concerning this remedial investigation request, please contact me at (919) 707-8354.

Sincerely,



Sue Murphy
Inactive Hazardous Sites Branch
Superfund Section, Division of Waste Management
North Carolina Department of Environment and Natural Resources
Cc: David A. Hunter, PG, ATC Associates of North Carolina, P.C.