



**FILE COPY**

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

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

April 16, 2012

Ms. Patricia Talcott, Hale Trailer Brake & Wheel, Inc.

c/o

Mr. Peter Sherr, PE, RSM

Ransom Consulting Engineers and Scientists

12 Kent Way, Suite 100

Byfield, Massachusetts 01922

**RE: Request for "No Further Action" Status  
Ferree Property  
1140 & 1150 Ivey Cline Rd, Concord, Cabarrus County, NC  
IHSB # NONCD0002803**

Dear Ms. Talcott:

The North Carolina Department of Environment and Natural Resources' Division of Waste Management (Division) – Superfund Section – Inactive Hazardous Sites Branch (IHSB) received a "Remedial Action Completion Report, Certification of Attainment of Cleanup Levels, and No Further Action Required" report from your consultant (Ransom Engineers and Scientists) on December 14, 2011. The submitted documents have been reviewed and the IHSB offers the following comments.

The submitted documentation includes site investigations and minor remediation activities at the site performed outside of the IHSB's voluntary oversight programs. Essentially, the areas of concern identified in the investigation efforts included: 1) petroleum stained soils and former above ground waste oil storage tanks (ASTs) immediately outside the west side of the fabrication building, 2) a former abandoned heating oil underground storage tank, 3) the on-site septic system as a potential receptor for wastes generated at the site, and 4) potential impacts to the on-site drinking water supply well. The investigation efforts did not identify any tested compounds in sludge samples collected from the site's septic tank. None of the tested contaminants were identified in soil samples collected from the abandoned UST and water samples collected from the on-site supply well were below detection limits for all tested compounds. Soil samples had confirmed petroleum contamination and a single detection of tetrachloroethylene in soils in the general area of the former waste oil ASTs. Soils were excavated for off-site disposal from this area and post-excavation soil samples did not find concentrations of petroleum compounds that exceeded either the IHSB's direct contact soil remediation goals or protection of groundwater criteria. One post excavation soil sample from this area (North Wall – Pit 1) did have a detection of tetrachloroethylene at 17 micrograms per kilogram which does not exceed the IHSB's direct contact soil remediation goals but does exceed the conservative protection of groundwater (POG) criteria value. The IHSB's guidelines discuss various methods, other than the conservative table values, for establishing POG criteria. These methods include, but are not limited to, analysis of a groundwater sample for the contaminants or analyzing soils with TCLP/SPLP analyses to determine if leachable concentrations in soil exceed the state's

15A NCAC 2L groundwater quality standards. The reports document averaging calculations of soil contaminant values as a means of determining if POG criteria have been met. The IHSB's guidelines clearly indicate that averaging of contaminant concentrations is only allowed for calculating alternate direct contact remediation goals. It is not a method for calculating an alternative cleanup goal for POG criteria. However, given that the nearby on-site supply well did not exhibit any concentrations of chlorinated solvent contamination; the release is not a recent activity; the apparent limited extent of the soil contamination and its low concentration, it is understood that the POG criteria have been met for tetrachloroethylene.

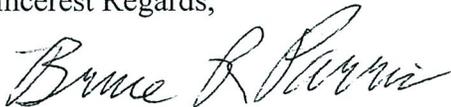
Based on the submitted information, this Site will be transferred to the "No Further Action" category in the Inactive Hazardous Sites Branch's inventory of sites. *No further remedial action will be required unless the Department later determines, based on new information or information not previously provided to the Department, that the site has not been remediated to current standards or that the Department was provided with false or incomplete information.*

You should also be aware that another nearby regulated site in the IHSB inventory, located at 1335 Ivey Cline Rd and known as Roach, Inc (Hale Trailer) NONCD0002406 – former APS# 19341, is still an open listed site at which the responsible party has not chosen to voluntarily conduct assessment and remediation under the IHSB. The status change to "No Further Action" at the Ferree Property site NONCD0002803 does not apply to the Roach, Inc (Hale Trailer) site NONCD0002406.

Please also be aware that petroleum contamination, regardless of source, falls under the regulatory jurisdiction of the Division of Waste Management's – Underground Storage Tank Section and a copy of this letter will be provided to them for any potential regulatory action they may require at this site.

If you have any further questions, please contact me at (704) 663-1699 or at [bruce.parris@ncdenr.gov](mailto:bruce.parris@ncdenr.gov).

Sincerest Regards,



Bruce R Parris, Western Regional Supervisor  
North Carolina Department of Environment and Natural Resources  
Division of Waste Management  
Superfund Section  
Inactive Hazardous Sites Branch

cc: Ron Taraban, MRO-UST Section Supervisor