

N.C. DEPARTMENT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES  
DIVISION OF SOLID WASTE  
HAZARDOUS WASTE SECTION

Circle one:  
G, I, P, GW, C, E

FILE DOCKET

DATE	ITEM
① 8-7-96	Re: Letter dated 7-27-96 subject: Notice of Violation
② 8-8-96	Ref: My letter to you dated 8-7-96
③ 7-2-96	CSE Report

RCRIS

I  
784  
SDG  
3

EPA ID #: NCR000001206

FACILITY NAME: D.A. Moore Corporation

CITY: Concord, NC

EVALUATION DATA:

NEW: X      CHANGE:      DELETE:

PERSON: 025

BRANCH: 01

AGENCY: STATE

REASON:

001

SUPERVISOR NOV TRACKING INFO

TYPE: CSE

INITIAL INSPECTION DATE: 7/2/96

DOCKET: 96-198 (IMNOV) 4-2-96

REINSP DATE: 5/21/97

COMMENTS: Facility Determined to be in Compliance w/NOV Docket #96-198

GENERATORS:

GBF: GER: GGR: GLB: GMR: GOR: GPT: GRR: GSC:

TRANSPORTERS:

TGR: TMR: TOR: TRR: TWD:

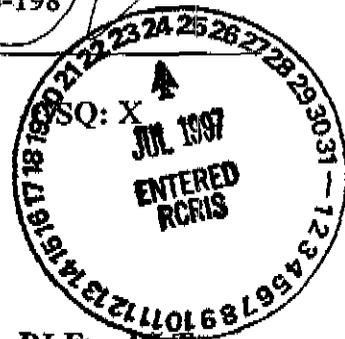
TSD's

DBF: DCH: DCL: DCP: DFR: DGS: DGW: DIN: DLB: DLF: DLT:

DMC: DMR: DOR: DOT: DPB: DPP:X DSI: DTR: DTT: DWP:

USED OIL:

TUO: TFO: BUO: MUO: PUO: RUO:



VIOLATION DATA: New: Change: Delete:

1. Agency: State Type: GER Date Determined:

Class: Priority: Seq#

Returned to Compliance: A

Actual Date:

Req. Description:

Comment:

2. Agency: State Type: Date Determined:

Class: Priority: Seq#

Returned to Compliance:

Actual Date:

Reg. Description:

Comment:

Division of Waste Management  
Hazardous Waste Section

May 21, 1997

Memorandum To: Keith Masters  
Western Area Compliance Unit Supervisor  
Hazardous Waste Section

From: Jesse W. Wells  
Waste Management Specialist  
 Mooresville Regional Office

Subject: NOV Docket # 96-198  
D.A. Moore Corporation  
36 Oak Street  
Concord, Cabarrus County, NC

Based upon a review of the Summary of Remedial Excavation Activities, dated May 5, 1997, the subject facility has complied with the requirements of NOV Docket #96-198. The facility has completed assessment/remediation activities required in the NOV. As a result of the findings the site was formally referred to the Department's Division of Water Quality/Groundwater Section. No further action will be required of D.A. Moore Corporation concerning the NOV and the facility is determined to be in compliance.

If you should have any questions, please advise.

State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Mooresville Regional Office

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary



Division of Waste Management  
Hazardous Waste Section

May 21, 1997

To: Barbara Christian, Supervisor  
Division of Water Quality/Groundwater Section

Through: Keith Masters  
Compliance Unit Supervisor  
Hazardous Waste Section

From: Jesse W. Wells *JWW*  
Waste Management Specialist  
Hazardous Waste Section

RE: D.A. Moore Corporation  
36 Oak Drive  
Concord, Cabarrus County, NC

Attached is information regarding the subject facility. The facility has completed compliance activities required by the HWS. Our review of assessment documents did indicate that site conditions exist which may warrant a review by your office. Consequently, we respectfully refer this site to your section for consideration. Please advise should you have any questions.

cc: Doug Holyfield  
Central Files

Division of Waste Management  
Hazardous Waste Section

May 21, 1997

Memorandum To: Barbara Christian, Supervisor  
DWQ/GW Section

Through: Keith Masters  
Western Area Compliance Supervisor  
Hazardous Waste Section

From: Jesse W. Wells *JWW*  
Waste Management Specialist  
Mooresville Regional Office

Subject: D.A. Moore Corporation  
36 Oak Drive  
Concord, Cabarrus County, NC

Attached are three site assessment/progress reports addressing remediation activities at the subject facility. The assessments were required due to the reported surface disposal of paint related wastes. Remediation of the suspected disposal area was required as a result of two risk based site assessments conducted by Dr. Luann Williams with the Department's Division of Epidemiology. Dr. Williams stated that methylene chloride concentration levels detected in the Phase I & II site assessment reports posed a threat to the groundwater resources. The methylene chloride was identified as the constituent of concern and a soil concentration of 22.1 ppb was established as a soil remediation level. Remediation activities consisted of soil excavation with subsequent disposal at the Laidlaw facility in Pinewood, S.C.

While excavating surface soils suspected of containing paint waste, a small solid waste disposal area was encountered at a depth of four feet. The soil in and around the solid waste had a distinct petroleum-like odor similar to diesel fuel. No known USTs are believed to have existed in the immediate area of the excavation. After encountering the buried waste, I met with company representatives to determine a course of action to address the burial site. It was decided that the buried waste would be removed along with associated impacted soils in an attempt to clean close the area.

Soil in the immediate area of the solid waste burial was initially excavated to a depth of 10 feet. An analysis by 8240 indicated the presence of ethylbenzene to be 4,280 ppb and m,p-xylene to be 2930 ppb. Due to the contaminant concentrations detected, the excavation was vertically advanced to a depth of 13 feet. At the 13 foot level the soil became wet and the excavation was halted. It was reported that the soils still exhibited a petroleum like odor. Samples collected from the area indicated the presence of ethylbenzene at 6.5 ppb and m,p-xylene at 8.3 ppb.

Page Two  
D.A. Moore Corporation  
May 21, 1997

Based upon the confirmation samples, the concentration of soil contaminants identified in the waste disposal area is below the 2L standards. The facility did meet the goal of the removal of soils containing methylene chloride above the 22.1 ppb target level. The information obtained from the assessment indicates that the contamination at the lower depths (ie >4 feet) is most likely attributable to the solid waste discovered buried on the property or a source which has not been identified. The ethylbenzene and m-p, xylene are not identified as characteristic toxic waste applying the TCLP criteria and the contaminants are only a listed hazardous waste for the characteristic of ignitability (F003). The contaminants in the state which they have been identified (ie contained in environmental media) would not exhibit the characteristic of ignitability and thus would not be considered a F003 listed hazardous waste.

This site is being referred to the DWQ/GW Section to make the GWS aware of the existing conditions at the facility and to initiate any additional remedial activities which the GWS may deem appropriate based upon the findings to date. No further action will be required by the HWS on this site and the facility has been determined to be in compliance with NOV Docket # 96-198 which required assessment of the suspected disposal area.

If you should have any questions, please advise.

cc: Doug Holyfield



I  
D.A. Moore  
NCR 0000001206  
Tesse ✓

August 8, 1996

Mr James A Carter  
Chief Hazardous Waste Section  
State of North Carolina  
Department of Environmental Health and  
Natural Resources  
P O Box 27687  
Raleigh, North Carolina 27611-7687

Ref: My Letter To You Dated August 7, 1996  
Notice of Violation Docket #96-198

Dear James,

On this date, August 8, 1996, Republic Environmental Systems, 1701B Spring Garden Street, Greensboro, NC 27403, telephone number (919) 274-4009, spent the day taking core samples of the area in question. They told me they are completed with this phase and we now must wait for the lab results.

This letter is just to inform you of our progress to comply with our violation notice.

Sincerely,

*Thomas A. Novinc*  
Thomas A Novinc

cc: Howard W Geyer  
Christ Boukis

“Doug —  
were you expecting  
this? I did not  
receive the referenced  
August 7 letter  
Would Jesse  
or someone need  
this for records?”  
8/12



August 7, 1996

Mr James A Carter  
Chief Hazardous Waste Section  
State of North Carolina  
Department of Environmental Health and  
Natural Resources  
P O Box 27687  
Raleigh, North Carolina 27611-7687

Dear Mr Carter,

In reference to your letter to me, dated July 22, 1996, Subject, Notice of Violation Docket #96-198, the following is being done:

On August 6, 1996, we issued Purchase Order #653 to Republic Environmental Systems, 1701B Spring Garden Street, Greensboro, NC 27403, Telephone Number (919) 274-4009, to do what is required for us to be in compliance. They have a copy of the letter you sent to me.

They will start the testing on Thursday, August 8, 1996.

I have also been in contact with Jesse W Wells to keep him informed of our game plan.

Sincerely,

*Thomas A. Moore*  
Thomas A Novinc

cc: Howard W Geyer  
Christ Boukis