



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