

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Mary Siedlecki
EPA ID: NCD991278805
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March 28, 2016

SENT VIA EMAIL

Mr. Larry Petty, President
Petty Machine Company, Inc.
P.O. Box 1888
Gastonia, North Carolina 28053

Re: *Facility Characterization Report* (dated March 10, 2016)
Petty Machine Company, Inc.
2403 Forbes Road
Gastonia, North Carolina
EPA Identification Number: NCD 991 278 805

Dear Mr. Petty:

The Hazardous Waste Section (Section) has reviewed the above referenced draft report, submitted on your behalf by Mr. Al Quarles of S&ME via email download on March 10, 2016. This report presents the sampling methodologies and analytical results aimed at addressing the data gaps identified in the site conceptual model.

The *Facility Characterization Report* (Report) exactly adhered to the agreed upon sampling methodologies outlined in the approved *Facility Characterization Work Plan* (final document dated September 11, 2015). The Report concisely presented the analytical data characterizing each of the earlier identified data gaps.

The Section has the following two comments on the Report:

1. Analytical data characterizing soils at the Facility are correctly compared to Inactive Hazardous Sites Branch Preliminary Soil Remediation Goals for health-based residential (PSRG_R) and industrial (PSRG_I) settings and for protection of groundwater (PSRG_{PoG}).

Although analytical results characterizing some soil samples did exceed PSRG_R, those results did not exceed either PSRG_I or PSRG_{PoG}. Because PSRG_R are defined as unrestricted use of a property in a residential setting, they are required to be conservative in nature.

Given the industrial setting of the Facility, Petty Machine may opt to compare analytical results to PSRG_I. In the event that Petty Machine opts to utilize the industrial screening goal(s), Petty Machine must impose land use restrictions on the areas of concern (e.g., SWMU 1, AOC 2, and AOC 3).

Should Petty Machine chose this option, Petty Machine may request "No Further Action" for the areas that screen out.

2. The purpose of this phase of the investigation was to address data gaps identified in the site conceptual model. Although every identified data gap was investigated, no conclusions were drawn or recommendations were made in the Report. The Report should be revised to discuss the analytical data in light of the rationale that supported the need for additional site characterization.

The Section is amenable to participating in a conference call to discuss the Report, should Petty Machine Company have any questions or comments. The Section will also be in Gastonia on April 8, 2016. Should Petty Machine Company wish to meet face-to-face, a meeting can be arranged in late morning (~11 am) or mid-afternoon (~2:30 pm). The revised Report is due no later than April 20, 2016.

Sincerely,



Mary Siedlecki, Project Manager
Department of Environmental Quality
Hazardous Waste Section

ec: Mr. Larry Petty, Petty Machine Company
Bud McCarty, Hazardous Waste Section
Mary Siedlecki, Hazardous Waste Section
Sean Morris, Hazardous Waste Section
Al Quarles, S&ME
Scott Young, S&ME