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Site Name WRIGHTSVILLE AVE

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DocDate 7/25/2011

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Box SF265

AccessLevel PUBLIC

Division WASTE MANAGEMENT

Section SUPERFUND

Program IHS (IHS)

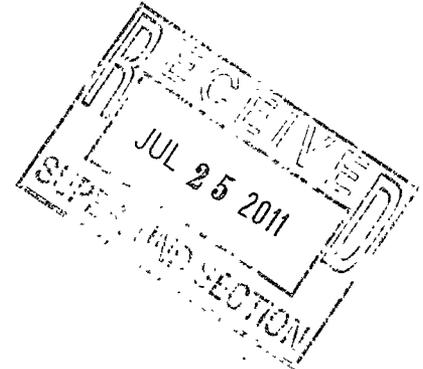
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July 8, 2011

Mr. Kim T. Caulk
REC Program
Inactive Hazardous Sites Branch, Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

REC-LEAD



Reference: Third Quarter 2011 Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project 22-13842E

Dear Mr. Caulk:

ECS Carolinas, LLP (ECS) has prepared the following Third Quarter 2011 Status Report for the above referenced site. This is the Tenth Quarterly Status Report for this site since execution of the REC Administrative Agreement (AA) on December 10, 2008.

The Second Quarter 2011 Status Report prepared by ECS proposed preparation of a Work Plan and the Vapor Intrusion Assessment to complete the Phase II Remedial Investigation Report. Several phases of soil and groundwater sampling have been completed at the site. Before initiating a Vapor Intrusion Assessment, ECS reviewed soil and groundwater assessment data from Phase I and II Remedial Investigation. Soil sampling results were noted to exhibit the presence of polynuclear aromatics (PAHs), as well as arsenic and lead in several locations exceeding Groundwater-Soil Remediation Goals or Health Based Soil Remediation Goals. Groundwater sample results indicated no volatile or semi volatile organic compounds (VOCs or SVOCs) with the exception of a trace concentration of bis-phthalates in one sample location (laboratory artifact) and an area which appears to be related to a petroleum release. A number of metals have been detected in groundwater samples including chromium and lead exceeding Title 15, NCAC, 2L-Ground Water Quality Standards (2L Standards). However, after numerous sampling events, the previously identified metal concentrations reduced to below the 2L Standards and it is ECS's opinion that the elevated metal concentrations were due to groundwater turbidity.

Historic use of this site has included residential occupancy as well as two phases of commercial use as a general store followed by a multi-tenant building used for retail, laundry and a grill. No industrial uses for this site have been disclosed through ECS's research. The general store building reportedly occupying the site burned down in the mid-1950's. Evidence of a black charred-organic debris/ash layer has been observed across the site in auger holes and Geoprobe™ soil borings advanced on the site. The charred debris/ash veneer is observed at an approximate depth of 1 to 2 feet below grade. It is suspected that the charred organic debris/ash material in the shallow subsurface soils is from the burned building and is the source for the elevated PAHs observed in groundwater samples collected from the site.

The site is presently vacant and devoid of structures. The site is zoned CS by the City of Wilmington, Planning & Zoning Department which allows for light industrial use and businesses that support manufacturing and light industry. The areas surrounding the site appear to be transitioning from residential to a variety of commercial uses including adjacent warehouses and retail/service businesses.

Quarterly Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
July 8, 2011

In consideration of the above findings, ECS forwarded the Branch a summary of soil and groundwater sampling data on June 14, 2011. ECS requested that the data be reviewed by the Branch and a determination be made to apply industrial/commercial remediation standards to this site. ECS further requested that if the Branch should determine that a Vapor Intrusion Assessment is necessary, please advise and we will move forward expeditiously.

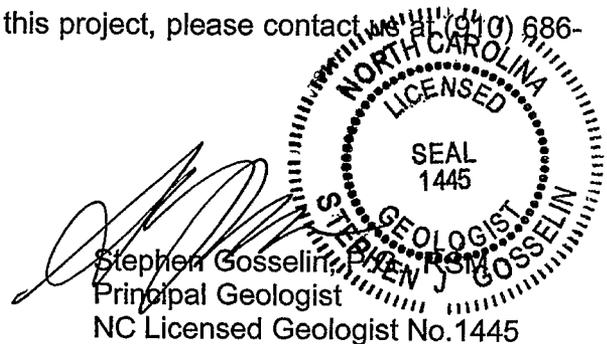
If the Branch responds that a Vapor Intrusion Assessment is required, the associated Work Plan and field assessment will be undertaken immediately and the findings reported within three weeks. The Phase II Remedial Investigation report should be completed within 30 days of completion a Vapor Intrusion Assessment, if required. This time frame would result in completion of the Remedial Investigation within the three year requirement of execution of the AA. Based on this time frame, the forthcoming work will be performed timely to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C.0302(h).

If you have any questions concerning this report or this project, please contact us at (910) 686-9114.

ECS CAROLINAS, LLP



Amy C. Conchas, REM
Senior Environmental Scientist



Stephen Gosselin, REM
Principal Geologist
NC Licensed Geologist No.1445

cc: Mr. Stephen Pike – Investors Trust Company

REMEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(b)(2)):

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Investors Trust Company as Trustee
Stephen E. Pike Pres.

(Name of Remediating Party Official)

* Step E Pike
(Signature of Remediating Party Official)

7/13/11
Date

North Carolina (Enter State)

Orange COUNTY

I, Josephine D. Watta, a Notary Public of said County and State, do hereby certify that Stephen E. Pike did personally appear and sign before me this day, produced proper identification in the form of NC Driver's License was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 13th day of July, 2011.

Josephine D. Watta
Notary Public (signature)

My commission expires: 4-2-2016.



REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1)):

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Stephen J. Gosselin
(Name of Registered Site Manager)

* [Signature]
(Signature of Registered Site Manager)

* 7/15/11
Date

Norah Carolina (Enter State)

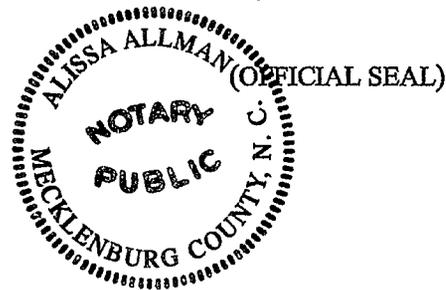
Mecklenburg COUNTY

I, Alissa Allman, a Notary Public of said County and State, do hereby certify that Stephen J. Gosselin did personally appear and sign before me this day, produced proper identification in the form of driver's license, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 15th day of July, 2011.

Alissa Allman
Notary Public (signature)

My commission expires: 3/13/2013



Macdonald, Janet K

From: Macdonald, Janet K
Sent: Wednesday, July 06, 2011 4:26 PM
To: 'JStewart1'
Subject: RE: 2501-2509 Wrightsville Avenue REC Site, ID No. NONCD002799

Request for Ind. PRGs

John,

It would be helpful if you could narrow down the specific constituents for which you need Industrial PRGs. Creating a **small spreadsheet of just those compounds that exceed an RG** that Hanna can just fill in the industrial values would expedite things. Also, Hanna will need a **map** showing the sample locations where any volatile compounds are elevated to determine if a vapor intrusion evaluation is warranted. I'm not sure if PAHs pose a concern for VI.

Thanks,

Janet

Janet Macdonald
Phone: (919) 508-8446

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

From: JStewart1 [mailto:JStewart1@ecslimited.com]
Sent: Wednesday, July 06, 2011 10:12 AM
To: Macdonald, Janet K
Subject: FW: 2501-2509 Wrightsville Avenue REC Site, ID No. NONCD002799

Here you go.

John M. Stewart, P.G., CPG
Senior Environmental Geologist

ECS Carolinas, LLP 4811 Koger Boulevard, Greensboro, NC 27407

T: 336.856.7150
C: 336.880.9370
D: 336.478.1621 x 3022
F: 336.856.7160

www.ecslimited.com

Confidential/proprietary message/attachments. Delete message/attachments if not intended recipient

From: RSmithwick
Sent: Tuesday, June 14, 2011 6:37 PM
To: kim.caulk@ncdenr.gov; janet
Cc: BMaas; JStewart1; AConchas; RSmithwick
Subject: FW: 2501-2509 Wrightsville Avenue REC Site, ID No. NONCD002799

Kim/Janet,

On behalf of John Stewart, PG/RSM with ECS I am forwarding the following information regarding the above site. A Phase I and II Remedial investigation (RI) was performed at this site and dated May 29, 2009 and December 2009 respectively. Additional Phase II RI work was performed in February 2010.

In brief summary, the Phase I and II RI soil sampling results indicate the presence of polynuclear aromatics (PAHs), as well as arsenic and lead in several locations exceeding Groundwater-Soil Remediation Goals or Health Based Soil Remediation Goals. In groundwater samples collected, results indicate no volatile or semi volatile organic compounds (VOCs or SVOCs) with the exception of a trace concentration of bis-phthalates in one sample location. A number of metals have been detected in groundwater samples including chromium and lead exceeding NCAC, 2L standards.

Site history reveals a number of uses on this site including multi-family residences, single-family residences and a building formerly used as a grocery, laundry and grill. The building reportedly burned down in the mid-1950's and is evidenced by a black charred-organic layer observed in shallow soil borings advanced throughout the site (depth= 2 to 3 feet). It is suspected that the charred organic material is related to the PAHs observed in groundwater samples collected from the site.

The site is cleared and vacant at this time. The site is zoned CS which allows for light industrial use and businesses that support manufacturing and light industry. The area appears to be transitioning from residential to a variety of commercial uses including adjacent warehouses and convenience stores.

At this time, we respectfully request that the attached data be reviewed and a determination be made by the Section to apply industrial/commercial remediation standards to this site. Also, please advise if a vapor intrusion assessment is still necessary based on your review of the data provided in this email.

We appreciate your consideration of this request. If you have any questions you may reach John at 336-856-7150 or myself at 910-686-9114.

Best regards-

Rudy Smithwick, PG

Senior Geologist/Environmental Department Manager
ECS Carolinas, LLP 7211 Ogden Business Park, Suite 201, Wilmington, NC 28411
T: 910-686-9114 C: 910-386-1798 F: 910-686-9666 www.ecslimited.com

Confidential/proprietary message/attachments. Delete message/attachments if not intended recipient.



ECS CAROLINAS, LLP

Geotechnical • Construction Materials • Environmental • Facilities

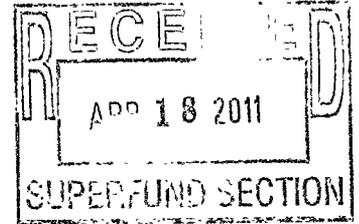
"Setting the Standard for Service"

NC Registered Engineering Firm F-1078

April 11, 2011

Mr. Kim T. Caulk
REC Program
Inactive Hazardous Sites Branch, Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

REC-LEAD



Reference: Second Quarter 2011 Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project 22-13842E

Dear Mr. Caulk:

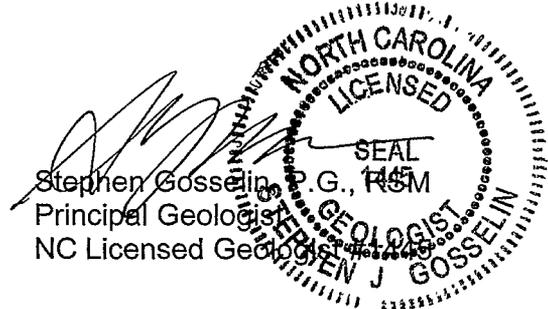
ECS Carolinas, LLP (ECS) has prepared the following Second Quarter 2011 Status Report for the above referenced site. This is the Ninth Quarterly Status Report for this site since execution of the REC Administrative Agreement (AA) on December 10, 2008. ECS has completed the soil and groundwater assessment for the site. However, based on the new regulations for Vapor Intrusion Potential, ECS will need to prepare a work plan and perform the vapor intrusion assessment before we can complete the Phase II Remedial Investigation Report.

Based on the current assessment schedule, the Phase I Remedial Investigation was completed in June 2009, approximately 6 months following execution of the AA. ECS has completed the initial sampling of Phase II of the Remedial Investigation by December 2009, which would be within 12 months of the executed AA. ECS has completed additional rounds of sampling as part of the Phase II Remedial Investigation and is the process of preparing the Phase II Remedial Investigation Report. ECS anticipates performing and completing the vapor intrusion assessment within approximately three months. The completed Phase II Remedial Investigation should be completed approximately three months after completion of the vapor intrusion assessment. This time frame would place completion of the remedial investigation within the three year requirement of execution of the AA. Based on this time frame, the work is in progress to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C.0302(h).

If you have any questions concerning this report or this project, please contact us at (910) 686-9114 or sgosselin@ecslimited.com.

Sincerely,
ECS CAROLINAS, LLP

Amy C. Conchas, REM
Environmental Department Manager



cc: Mr. Stephen Pike – Investors Trust Company

REMEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(b)(2)):

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Investors Trust Company Trustee by Stephen E. Pike
(Name of Remediating Party Official)

* Steph SCIL
(Signature of Remediating Party Official)

* 4/13/11
Date

North Carolina (Enter State)

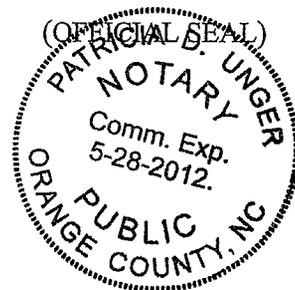
Orange COUNTY

I, Patricia D. Unger, a Notary Public of said County and State, do hereby certify that Stephen E. Pike did personally appear and sign before me this day, produced proper identification in the form of NC DL, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 13th day of April, 2011.

Patricia D. Unger
Notary Public (signature)

My commission expires: 05-28-2012



REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1)):

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

STEPHEN J. GOSSELLIN
(Name of Registered Site Manager)

* [Signature]
(Signature of Registered Site Manager)

* 4/14/11
Date

North Carolina (Enter State)

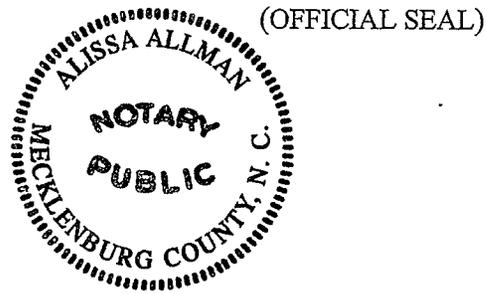
Mecklenburg COUNTY

I, Alissa Allman, a Notary Public of said County and State, do hereby certify that Stephen J. Gosselin did personally appear and sign before me this day, produced proper identification in the form of Drivers license, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 14th day of April, 2011.

Alissa Allman
Notary Public (signature)

My commission expires: 3/13/2013





REC-LEAD

North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

December 10, 2010

Mr. Stephen Gosselin, P.G.
ECS Carolinas, LLP
8702 Red Oak Boulevard, Suite A
Charlotte, NC 28217

COPY

Re: REC Project Audit *Letter*
Wrightsville Avenue
Wilmington, New Hanover County, NC
Site ID No.: NONCD0002799

Dear Mr. Gosselin:

The Inactive Hazardous Sites Branch (Branch) has performed a technical audit of the Remedial Investigation Work Plan Phase II (and two Addendums), submitted between October 2009 and October 2010, for the Wrightsville Avenue Site (Site). Audits conducted by the Registered Environmental Consultant (REC) Program are intended to review the REC's compliance with the rules specified in 15A NCAC 13C. 0300. Oversight of the technical aspects of the project and remedial activities is the responsibility of the Registered Site Manager (RSM).

On June 15, 2010, the Branch sent a letter requesting explanation and/or clarification on several comments. Your responses to the comments received on July 14, 2010 are considered sufficient, and no potential REC rule violations are identified. As stated in the Remedial Investigation Work Plan Phase II Second Addendum, site characterization will continue to define the extent of identified impacts. Be sure that future certified reports provide details for all the items set forth in the REC rules (15A NCAC 13C .0306). If an item is omitted, please provide a rationale for the omission. Addressing all REC Program document requirements is critical for clarity in the public record and to avoid potential violations.

The Branch appreciates the efforts performed at the Site by ECS Carolinas, LLP and Investors Trust Company. If you have any questions, please feel free to contact me at (919) 508-8446 or jkmacdonald@ncdenr.gov.

Sincerely,

Janet K. Macdonald, P.G.
REC Program
Inactive Hazardous Sites Branch
Superfund Section

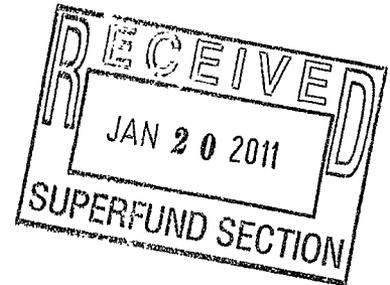
cc: Mr. Stephen Pike, Investors Trust Company



January 6, 2011

Mr. Kim T. Caulk
REC Program
Inactive Hazardous Sites Branch, Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Reference: First Quarter 2011 Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project 22-13842E



Dear Mr. Caulk:

ECS Carolinas, LLP (ECS) has prepared the following First Quarter 2011 Status Report for the above referenced site. This is the Eighth Quarterly Status Report for this site since execution of the REC Administrative Agreement (AA) on December 10, 2008. ECS has finalized and submitted the Phase II Remedial Investigation Work Plan which included defining the horizontal and vertical extent of the polyaromatic hydrocarbon (PAH) contaminated soils and confirming and defining the lead and chromium concentrations in the groundwater. ECS previously completed the initial stage of soil sampling as part of the Phase II Remedial Investigation and installed two permanent groundwater monitoring wells with one sampling event to confirm the lead and chromium concentrations in the groundwater.

Since the previous quarterly status report, ECS submitted the Remedial Investigation Work Plan, Phase II Second Addendum, dated October 7, 2010. The Work Plan consisted of performing ground penetrating radar (GPR) and an electromagnetic (EM) survey of the site to determine the area of buried debris and locations of potential buried drums or tanks. Based on the results of the GPR study, additional soil sampling was conducted in an area of unidentified anomalies and on the perimeter of known soil contamination to define the area of PAH impacted soil. Additional groundwater sampling was also performed from the two on-site monitoring wells to determine if the metals concentrations in the groundwater were related to suspended sediment in the groundwater samples.

On October 25, 2010, the GPR and EM survey was performed on the site. The EM survey did not identify buried drums or tanks but did identify potential septic systems associated with a former on-site residence and smaller areas of buried debris, such as bottles, cans and other smaller metal containers. The GPR survey identified two large buried features which did not appear to be tanks but metal debris. The survey also identified a buried water main leading from Wrightsville Avenue to the northern commercial building. The buried water main appeared to be in the former location of the entrance road for the northern commercial building.

On November 19, 2010, ECS performed the soil and groundwater sampling as identified in the Work Plan. Do to prior samples in the vicinities of the anomalies identified in the GPR and EM survey, additional soil sampling within the interior of the site was not performed. Soil samples were performed around the perimeter of the known contamination and based on the results, the area of PAH impacted soil appeared to be defined. The area of petroleum contaminated soil was unable to be defined on the southern site boundary due to utilities located along

Quarterly Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
January 6, 2011

Wrightsville Avenue. Additionally, the results of the groundwater sampling did not identify metals concentrations exceeding the NCAC 2L groundwater standard. Since the assessment has defined the PAH impacted soils and the groundwater results were below NCAC 2L groundwater standards, ECS is preparing the Phase II Remedial Investigation Report.

Based on the current assessment schedule, the Phase I Remedial Investigation was completed in June 2009, approximately 6 months following execution of the AA. ECS has completed the initial sampling of Phase II of the Remedial Investigation by December 2009, which would be within 12 months of the executed AA. ECS has completed additional rounds of sampling as part of the Phase II Remedial Investigation and is in the process of preparing the Phase II Remedial Investigation Report. The additional assessment should be completed within an additional six months. This time frame would place completion of the remedial investigation within the three year requirement of execution of the AA. Based on this time frame, the work is in progress to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C.0302(h).

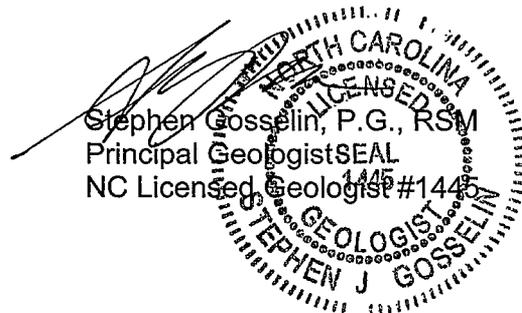
If you have any questions concerning this report or this project, please contact us at (910) 686-9114 or sgosselin@ecslimited.com.

Sincerely,
ECS CAROLINAS, LLP



Amy C. Conchas, REM
Environmental Department Manager

cc: Mr. Stephen Pike – Investors Trust Company



REMIEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(b)(2)):

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Stephen E Pike for Investors Trust Co.
(Name of Remediating Party Official)

* Step E Pike
(Signature of Remediating Party Official)

* 1/12/11
Date

North Carolina (Enter State)

Orange COUNTY

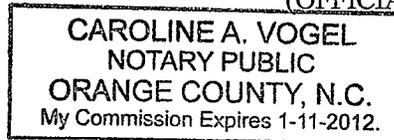
I, CAROLINE A. VOGEL, a Notary Public of said County and State, do hereby certify that STEPHEN E. PIKE did personally appear and sign before me this day, produced proper identification in the form of _____, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 12th day of January, 2011.

Caroline A. Vogel
Notary Public (signature)

(OFFICIAL SEAL)

My commission expires: 1-11-2012



REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1)):

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

STEPHEN J. GOSSELIN
(Name of Registered Site Manager)

* [Signature]
(Signature of Registered Site Manager)

* 1/17/11
Date

North Carolina (Enter State)

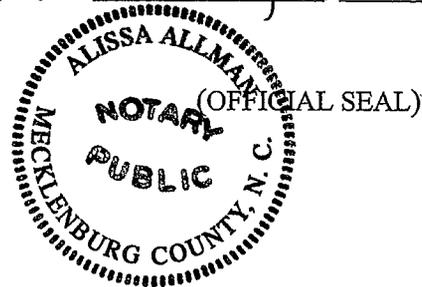
Mecklenburg COUNTY

I, Alissa Allman, a Notary Public of said County and State, do hereby certify that Stephen J. Gosselin did personally appear and sign before me this day, produced proper identification in the form of drivers license, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 17th day of January, 2011.

Alissa Allman
Notary Public (signature)

My commission expires: 3/13/2013





ECS CAROLINAS, LLP

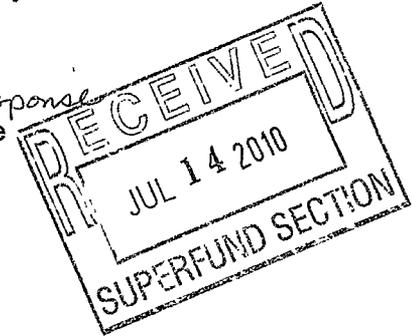
Geotechnical • Construction Materials • Environmental • Facilities

July 8, 2010

Mr. J. Keith Rodgers
REC Program
Inactive Hazardous Sites Branch, Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Reference: Second Quarter 2010 Status Report *w/ Audit Response*
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project 22-13842D

REC-LEAD



Dear Mr. Rodgers:

ECS Carolinas, LLP (ECS) has prepared the following Second Quarter 2010 Status Report for the above referenced site. This is the Sixth Quarterly Status Report for this site since execution of the REC Administrative Agreement (AA) on December 10, 2008. ECS has finalized and submitted the Phase II Remedial Investigation Work Plan which included defining the horizontal and vertical extent of the polyaromatic hydrocarbon (PAH) contaminated soils and confirming and defining the lead and chromium concentrations in the groundwater. ECS previously completed the initial stage of soil sampling as part of the Phase II Remedial Investigation and installed two permanent groundwater monitoring wells with one sampling event to confirm the lead and chromium concentrations in the groundwater.

Since the previous quarterly status report, ECS performed additional groundwater sampling for the work plan addendum on April 7 and April 8, 2010. ECS additionally coordinated with a NC licensed land surveyor to update the site plan. The additional assessment continues to identify concentrations of arsenic, chromium and lead in the groundwater at concentrations exceeding the NCAC 2L groundwater standard. However, the concentrations do not appear to be consistent which could correspond to suspended sediment in the groundwater. Additionally, the soil concentrations continue to exceed the Soil Remediation Goals.

Based on the current assessment schedule, the Phase I Remedial Investigation was completed in June 2009, approximately 6 months following execution of the AA. ECS has completed the initial sampling of Phase II of the Remedial Investigation by December 2009, which would be within 12 months of the executed AA. ECS has completed a second round of sampling as part of the Phase II Remedial Investigation. ECS is in the process of assessing the data for determination of additional sampling locations to define the site contamination. The additional assessment should be completed within an additional six months. This time frame would place completion of the remedial investigation within 26 months of execution of the AA. Based on this time frame, the work is in progress to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C.0302(h).

In response to the REC Project Audit letter dated June 15, 2010, ECS provides the following clarifications or amended corrections to the listed items.

- 1) The ownership information was obtained as part of the Phase I Environmental Site Assessment. ECS's historical review was unable to obtain historical information of the site prior to pristine land. The earliest historical record for the site was a 1945 city directory which listed the address as a residence. The surrounding area was part of the Delgado Mill which was established in 1899 with the purchase of 102 acres. Residential houses near the site were constructed between 1910 and 1920 as part of the mill village. In 1931, the mill was renamed Spofford Mills. Based on a review of the New Hanover County tax records, the former mill houses to the west and south of the site were constructed in 1917, which is the earliest listing for residential construction in the site area. Therefore, ECS believes the former site residence was constructed in 1917 and this residence is presumed to be the first development on the site. The following summarizes the additional property ownership information ECS was able to obtain from the deed review.

Based on the historical review of deeds for the site, Patricia Faye Hobbs Myers obtained the site from James H. Hobbs Jr. et al on December 2, 1999 as recorded in Deed Book 2674, Page 0877. Mildred Hobbs obtained the property from United Development Company on August 21, 1968, as recorded in Deed Book 839, Page 676. ECS was unable to trace the exact deeds for the site; however, United Development Company obtained the site area from Hobbs Construction and members of the Hobbs family in 1964. The Hobbs obtained their properties from the Spofford Mills in the later 1950s and early 1960s. As mentioned above, ECS assumes Delgado/Spofford Mills obtained the property when it was raw land. Please advise if this does not surface and ECS will obtain a chain-of-title with deed pages and exact dates.

- 2) The statement in the RI Work Plan stating that sanborn maps are not available for the site was a mistake. Sanborn maps are available for the site area dating back to 1921 and for the site dating from 1951.
- 3) The attached revised health and safety plan includes a section for addressing the community health and safety and not just personnel involved in the remedial activities.
- 4) ECS did not include cross-sections in the Phase I Remedial Investigation Report since the intent of that report was to identify the potential source areas and chemicals of concern, not to define the contamination. Cross-sections of soil and groundwater contamination will be included in the Phase II Remedial Investigation Report which will include the definition of the horizontal and vertical extent of the site contaminants and their relation to potential source areas.
- 5) Attached are recent color copies of photographs of the site. Site photographs were included with the Phase I ESA and the site has not changed and remained vacant since the Phase I ESA. Therefore, updated photographs were not collected. ECS will collect photographs of the site during the field assessment events to include in the Phase II Remedial Investigation Report.

Quarterly Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
July 8, 2010

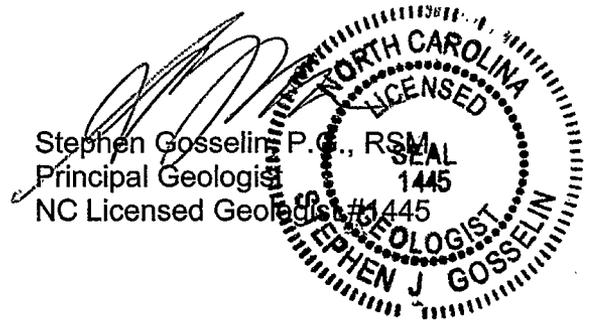
If you have any questions concerning this report or this project, please contact us at (910) 686-9114 or sgosselin@ecslimited.com .

Sincerely,
ECS CAROLINAS, LLP



Amy C. Conchas, REM
Environmental Department Manager

cc: Mr. Stephen Pike – Investors Trust Company



ECS Site-Specific Health, Safety and Accident Prevention Plan

GENERAL INFORMATION

Client/Site Name: Stephen Pike with Investors Trust Company / Wrightsville Avenue REC Site
 Site Address: 2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
 Wilmington, New Hanover County, North Carolina
 Job/Project #: 22-13842 D
 Estimated Start Date: February 2010 Estimated Completion Date: March 2010

EMERGENCY INFORMATION

Phone Numbers: Hospital #: (910)343-7000 Ambulance #: 911
 Fire #: 911 Police #: 911
 Hospital Name & Address: New Hanover Regional Medical Center
2131 S. 17th Street, Wilmington, North Carolina
 Directions and Street Map of Route to Nearest Hospital Attached: Yes No (if no, do not proceed)
 Other Emergency Contact: Kris Stamm (ECS -- Wilm. Safety Officer) Phone #: (910) 520-9692
 Location of Nearest Phone: Adjacent properties

Have Necessary Underground Utility Notifications for Subsurface Work Been Made? Yes Not Applicable

Specify Clearance Date & Time, Dig Safe Clearance I.D. #, And Other Relevant Information:

Multiple dates, depends on specific work. Utility Clearance Forms are attached

SCOPE OF WORK

Site Description: Vacant lot previously occupied by a multi-tenant commercial building and duplex. Prior to that, the property was occupied by a general store and residential buildings.
 Specific Tasks Performed by ECS: ECS will install soil borings using a geoprobe to collect soil samples and install groundwater monitoring wells to perform the site assessment
 Concurrent Tasks to be Performed by ECS Subcontractors (List Subcontractors by Name): Subsurface Environmental Investigation (SEI)
 Concurrent Tasks to be Performed by Others: None at this time

Does this project include confined space entry? yes no

ROLES AND RESPONSIBILITIES:

ECS ON-SITE PERSONNEL

Name	Project Title/Assigned Role	Telephone Numbers
Amy Conchas	Project Scientist/Site Supervisor	work: (910) 686-9114 home: (910) 794-2919
Amy Conchas	Project Scientist/Site Safety Officer/Competent Person	work: (910) 686-9114 home: (910) 794-2919

Site Supervisors and Project Managers (SS/PM): Responsibility for compliance with ECS Health and Safety programs, policies, procedures and applicable laws and regulations is shared by all ECS management and supervisory personnel. This includes the need for effective oversight and supervision of project staff necessary to control the Health and Safety aspects of ECS on-site activities.

Site Safety Officers and Competent Persons (SSO/CP): The Site Safety Officer (SSO) or "Competent Person", as defined by OSHA 1926.20(b) - Accident Prevention Responsibilities, is the individual "who is capable of identifying existing and predictable hazards in surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them." The SSO is designated on a site-by-site basis based on the site conditions, scope-of-work, and the individual's ability to recognize site-specific hazards and take appropriate corrective actions. This individual is responsible to both project management and the designated HSC with regard to the completion of these assigned duties.

Staff: Ultimate control of Health and Safety is in the hands of each individual employee. Therefore, each employee must become familiar with and comply with all Health and Safety requirements associated with their position and daily operations. Employees also have the responsibility to notify the appropriate management, SSO and HSC of unsafe conditions and accidents/injuries immediately. When employees are issued respirators or any other personal protective equipment (PPE), they are responsible for ensuring that said items are used properly, cleaned as required and maintained in good working order.

(Sub)contractors: (Sub)contractors must develop their own accident prevention plan related to their specific on-site activities. Subcontractors may use ECS's plan as an informational model. However, each Subcontractor is responsible for determining the plan's adequacy and applicability to its own activities on site. Subcontractors must deliver their plan in clear written form to ECS prior to the initiation of on-site activities.

OTHER PROJECT PERSONNEL:

Name	Project Title/Assigned Role	Telephone Numbers
Stephen Gosselin	Associate/Principal-in-Charge	Work: (704) 525-5152 Home:
Amy Conchas	Project Manager	work: (910) 686-9114 home: (910) 794-2919
Kris Stamm	Health and Safety Coordinator (HSC)	Work: (910) 686-9114 Home: (910) 973-1395

PLAN ACKNOWLEDGMENT AND APPROVALS

Approval or Acknowledgment	SSO/CP	SS/PM	AIC/PIC	HSC
Probable hazards identified on form.		X		X
Project scope accurately reflected on form.		X	X	
Appropriate emergency response information identified on form.		X		X
Appropriate control measures identified on form.		X		X
Hazards and control measures to be implemented on site acknowledged.	X	X	X	
Overall project scope and health and safety requirements acknowledged.	X	X	X	

DOCUMENTATION TO BE COMPLETED ON SITE

- A **Site Inspection Log** (page 11) must be completed at the initiation of on-site activities and at least once per week thereafter until the completion of ECS on-site activities.
- A **Site Health and Safety Briefing/ Site Orientation Record** (page 12) must be completed at the initiation of on-site activities and at least once per week thereafter until the completion of ECS on-site activities. (Note: The actual briefing may be conducted off site, in the office for example, if conditions preclude or render impractical its completion on site.)
- The **Subcontractor's Statement of Understanding Regarding Health and Safety Responsibilities** (page 13) and the **ECS Incident Report and/or Discovery of a Potential Hazard** (page 14) are to be completed on an as needed basis.

EQUIPMENT AND CONTROLS

<p>Monitoring Equipment ¹</p> <p><input type="checkbox"/> PID Type: Lamp Energy: eV</p> <p><input checked="" type="checkbox"/> FID Type:</p> <p><input type="checkbox"/> Cal gas and equipment type:</p> <p><input type="checkbox"/> LEL/O₂ Meter</p> <p><input type="checkbox"/> Others:</p> <p>Other Equipment & Gear ²</p> <p><input checked="" type="checkbox"/> 10# ABC Fire Extinguisher when gasoline powered equipment is present</p> <p><input type="checkbox"/> Caution Tape</p> <p><input type="checkbox"/> Traffic Cones or Stanchions</p> <p><input type="checkbox"/> Warning Signs or Placards</p> <p><input checked="" type="checkbox"/> Decon Buckets, Brushes, Detergent, Towels and Plastic Bags</p> <p><input type="checkbox"/> Others:</p>	<p>Personal Protective Equipment</p> <p><input type="checkbox"/> Respirator Type:</p> <p><input type="checkbox"/> Resp-Cartridge Type:</p> <p><input checked="" type="checkbox"/> Hearing Protection</p> <p><input checked="" type="checkbox"/> Hardhat</p> <p><input type="checkbox"/> Outer Gloves Type:</p> <p><input type="checkbox"/> Inner Gloves Type:</p> <p><input checked="" type="checkbox"/> Steel-toed boots/shoes</p> <p><input type="checkbox"/> Coveralls Type:</p> <p><input type="checkbox"/> Outer Boots Type:</p> <p><input checked="" type="checkbox"/> Eye Protection with side shields</p> <p><input type="checkbox"/> Traffic Vest</p> <p><input type="checkbox"/> Personal Flotation Device (PFD)</p> <p>Others:</p>
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1. All direct reading instruments must be referenced on site at least twice/day (pre- and postsampling) using a cal-gas reference standard and in accordance with the manufacturer's instructions. Monitoring using direct reading instruments should be continuous while there is disturbance of material (e.g. soil).
2. A 15- to 25-foot exclusion zone is required wherever necessary to control access to heavy equipment and/or hazardous exposure situations.

AIR MONITORING INSTRUMENTS AND ACTION LEVELS:

Anticipated Chemical Hazards: PAHS

Organic Vapor Detector H-Nu, OVM, OVA (if required) - Breathing Zone Readings (will be completed by HSC):

<p>_____ to _____ units</p>	<p>Remain in Level D. Use colorimetric tubes or other chemical specific device to verify low PEL contaminant levels do not contain another similar toxic materials (Benzene, Vinyl Chloride, etc.) where applicable. Cease work and consult with DHSC if levels of benzene or vinyl chloride exceed 1/2 ppm on a sustained basis.</p>
<p>_____ to _____ units</p>	<p>Withdraw from work area and contact Project Management. Proceed to Level C protection for re-entry, or discontinue operation</p>
<p>> _____ units</p>	<p>Secure operations, withdraw from work area, and discontinue work at that location until contaminants can be evaluated, and detailed (SSHP) plan implemented.</p>

Combustible Gas Indicator CGI/LEL Meter (if required) - Readings Near Vapor Source:

<ul style="list-style-type: none"> • < 10% LEL: • 10% to 20% LEL: • > 20% LEL: 	<ul style="list-style-type: none"> Continue to monitor with caution. Eliminate all ignition sources. Stop operations until appropriate vapor control measures (i.e. foam, sand, polyethylene, film, portable blower etc.) and resample before resuming activity. Stop operations and withdraw from area. Contact DHSC before proceeding.
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HAZARD ASSESSMENT

Enter **X** (*applies, or required item(s) available*) or **leave blank** (*not applicable*)

HAZARD ASSESSMENT: PHYSICAL HAZARDS AND RELATED CONCERNS

Confined Space Entry (CSE). Confined space entry means the *potentially hazardous* entry into any space which, by design, has limited openings for entry and exit, unfavorable natural ventilation which could contain or produce dangerous air contaminants, and which is not intended for continuous employee occupancy. Confined spaces include but are not limited to storage tanks, compartments of ships, process vessels, pits, silos, vats, degreasers, reaction vessels, boilers, ventilation and exhaust ducts, sewers, tunnels, underground utility vaults, and pipelines. Other environments which must be treated as confined spaces include *test pits, and basements, garages, warehouses and other indoor areas where mechanical (i.e., diesel, propane, gasoline or similarly powered) equipment must be operated for drilling or test pitting purposes*. Confined space entry should be allowed only when absolutely necessary, and then only when all requirements of ECS's Confined Space Entry Control Program, and/or CSE Program Supplement for Indoor Drilling (and Similar Operations) and/or Trench and Excavation Safety and Health Guide (and CSE Program Supplement), contained in the Health and Safety Program Manual, have been satisfied.

Construction Hazards, Drill Rigs, Backhoes, etc. The use of drill rigs, backhoes and other heavy equipment represent potentially serious construction hazards. Whenever such equipment is used, personnel in the vicinity should be limited to those who must be there to complete their assigned duties. All personnel must avoid standing within the turning radius of the equipment or below any suspended load. Job sites must be kept as clean, orderly and sanitary as possible. When water is used, care must be taken to avoid creating muddy or slippery conditions. If slippery conditions are unavoidable, barriers and warning signs must be used to warn of these dangers.

Never turn your back to operating machinery. Never wear loose clothing, jewelry, hair or other personal items around rotating equipment or other equipment that could may catch or ensnare loose clothing, jewelry, hair or other personal items. Always stand far enough away from operating machinery to prevent accident contact which may result from mechanical or human error.

Additionally, the following basic personal protective measures must be observed: **Hardhats** must be worn to protect against bumps or falling objects. **Safety glasses** must be worn by all workers in the vicinity of drill rigs or other sources of flying objects. Goggles, face shields or other forms of eye protection must be worn when necessary to protect against chemicals or other hazards. **Steel-toed safety shoes or boots** are also required. The shoes must be chemically resistant or protected with appropriately selected boots/coverings where necessary. Unless otherwise specified, normal **workclothes** must be worn. Long sleeves and gloves are also required whenever necessary to protect against hazardous contact, cuts, abrasions or other possible skin hazards.

Electrical. OSHA regulations require that employees who may be exposed to electrical equipment be trained to recognize the associated hazards and the appropriate control methods. All **extension cords** used for portable tools or other equipment must be designed for hard or extra usage and be (three-wire) grounded. All 120-volt, single-phase 15- and 20-ampere receptacle outlets on construction sites, and other locations where moisture/water contact may occur, must be equipped with **ground-fault circuit interrupters (GFCI)** units. GFCI units must be attached directly to or as close as possible to the receptacle. GFCI located away from the receptacle will not protect any wiring between the receptacle and the GFCI unit. Only the wiring plugged into the GFCI and outward will be protected by the GFCI. All (**temporary lighting**) lamps for general illumination must be protected from accidental breakage. Metal case sockets must be grounded. Portable lighting in wet or conductive locations should be 12 volts or less.

Drums and Buried Drums. As a precautionary measure, personnel must assume that *labeled and unlabeled drums* encountered during field activities contain hazardous materials until their contents can be confirmed and characterized. Personnel should recognize that drums are frequently mislabeled, particularly drums that are reused.

Only trained and authorized personnel should be allowed to perform drum handling. Prior to any handling, drums must be visually inspected to gain as much information as possible about their contents. Trained field personnel must look for signs of deterioration such as corrosion, rust or leaks, and for signs that the drum is under pressure such as swelling or bulging. Drum-type and drumhead configuration may provide the observer with information about the type of material inside, (i.e., a removable lid is designed to contain solids, while the presence of a bung indicates liquid storage).

Although not usually anticipated, buried drums can be encountered when digging test pits. Therefore, the following provisions must be observed if drums are encountered. Machine excavation (i.e., backhoe) should cease immediately anytime a drum is encountered. The appropriate management personnel should be notified immediately. All ECS personnel should be instructed to immediately leave the work area.

Even authorized personnel must not enter an excavation where drums have been uncovered, even for monitoring purposes, unless all provisions of OSHA's trenching and excavation standard have been met and the appropriate level of personal protective equipment (PPE) is utilized. Sampling of unknown drums usually requires Level B protection. Buried drums must not be moved unless it can be accomplished in a safe manner and overpack drums are available.

- Fire and Explosion.** The possibility of flammable materials being encountered during field activities must be recognized and the appropriate steps necessary to minimize fire and explosion must be observed. This includes situations where *excessive organic vapors, free product or methane* are, or may be, encountered. When this occurs, monitoring with a combustible gas indicator (CGI), is required.

In situations where hexane, methanol are needed for field activities, the following precautions must be observed: keep flammable and combustible materials away from heat, sparks and open flames; do not smoke around flammable or combustible materials; provide an ABC rated fire extinguisher appropriate for the materials present, and keep all flammable and combustible liquids in approved and properly labeled safety containers.

- Landfill/Methane Hazards.** Fire and explosion should be regarded as one of, if not the, most significant potential hazards associated with drilling operations and other intrusive work conducted at a landfill. Accordingly, all sources of ignition must be fully controlled. Failure to control ignition sources could result in fire, explosion and pose a serious threat to life and health. Control methods may include forced ventilation and/or filling the borehole with enough water to inhibit the release of methane and other gases which would otherwise escape through the top of the borehole.

If forced (mechanical) ventilation is to be used, all such equipment must be approved for Class I, Division I hazardous atmospheres. The blower must be positioned to blow across the top of the borehole so that gases and vapors may be diluted as they exit the borehole. Do not attempt to suck out the gases or vapors. Blowers, all other mechanical equipment, and tools which could release sparks or static electricity must be bonded and grounded.

Regardless of the gas/vapor control method used, the atmosphere surrounding the borehole must be frequently monitored using direct reading instruments approved for Class I, Division I hazardous atmospheres. Monitoring should be conducted within 1 to 2 feet of the top of the borehole. Do not insert sampling devices into the borehole. The use of tubing connected to a remote instrument is recommended. Never approach the auger or drill shaft while it is in operation. Always notify the operator when about to take a reading.

Regardless of actual instrument readings, if all sources of ignition can not be controlled, operations should be immediately shut down if readings equal or exceed 10% of LEL and the area evacuated until ignition sources have been eliminated. Ignition sources include, but are not limited to: smoking, static electricity, lighting, open flames, spontaneously ignitable substances, frictional heat or sparks, hot surfaces, radiant heat, electrical sparks, stray currents, cutting and welding, and ovens, furnaces and heating equipment.

- Heat and Cold Stress.** Overexposure to temperature extremes can represent significant risks to personnel if simple precautions are not observed. Typical control measures designed to prevent **heat stress** include dressing properly, drinking plenty of the right fluids, and establishing an appropriate work/break regimen. Typical control measures designed to prevent **cold stress** also include dressing properly, and establishing an appropriate work/break regimen. The project manager must assure that the appropriate provisions of ECS's **Heat and Cold Stress Control Program** contained in the Health and Safety Program Manual are observed.

- Moving Vehicles, Traffic Safety.** All vehicular traffic routes which could impact worker safety must be identified and communicated. Whenever necessary, barriers or other methods must be established to prevent injury from moving vehicles. Traffic vests must be worn by personnel working near moving vehicular traffic. This is particularly important when field activities are conducted in parking lots, driveways, ramps or roadways. OSHA 1926.201 specifies that when signs, signals or barricades do not provide adequate protection from highway or street traffic, flagmen must be utilized. *Flagmen must wear red or orange garments. Garments worn at night must be reflective.*

- Noise.** Noise exposure can be affected by many factors including the number and types of noise sources (continuous vs. intermittent or impact), and the proximity to noise intensifying structures such as walls or buildings which cause noise to bounce back or echo. The single most important factor effecting total noise exposure is distance from the source. The closer one is to the source the louder the noise. The operation of a drill rig, backhoe or other mechanical equipment can be sources of significant noise exposure. In order to reduce the exposure to this noise, personnel working in areas of excessive noise must use hearing protectors (ear plugs or ear muffs) in accordance with the ECS **Hearing Conservation Program** contained in the Health and Safety Program Manual.

Rule-of-Thumb: Wherever actual data from sound level meters or noise dosimeters is unavailable and it is necessary to raise one's voice above a normal conversational level to communicate with others within 3 to 5 feet away, hearing protection should be worn.

- Overhead Utilities and Hazards.** Overhead hazards can include low hanging structures which can cause injury due to bumping into them. Other overhead hazards include *falling objects, suspended loads, swinging loads and rotating equipment*. Hardhats must be worn by personnel in areas were these types of physical hazards may be encountered. Barriers or other methods must also be used to exclude personnel from these areas were appropriate. Electrical wires are another significant overhead hazard. According to OSHA (29 CFR 1926.550), *the minimum clearance which must be maintained from overhead electrical wires is 10 feet* from an electrical source rated ≤ 50 kV. Sources rated > 50 kV require a minimum clearance of 10 feet plus 0.4 inch per kV above 50 kV.

- Pedestrian Traffic.** The uncontrolled presence of pedestrians on a drilling or excavation site can be hazardous to both pedestrians and site workers. Prior to the initiation of site activities, the site should be surveyed to determine if, when and where pedestrian may gain access. This includes walkways, parking lots, gates and doorways. Barriers or caution tape should be used to exclude all pedestrian traffic. *Exclusion of pedestrian traffic is intended to prevent injury to the pedestrians and eliminate distractions which could cause injury to ECS personnel or other site workers.*

- Test Pit and/or other Excavations.** All provisions of the OSHA trenching and excavation standard (29 CFR 1926.650-652) and ECS's **Trench and Excavation Safety and Health Guide (and CSE Program Supplement)** contained in the Health and Safety Manual must be followed during excavation activities. This includes *all test pit excavation and sampling activities*. The estimated location of utility installations, such as sewer, telephone, electric, water lines and other underground installations that may reasonably be expected to be encountered during excavation work, must be determined prior to opening an excavation.

Excavations in contaminated or potentially contaminated areas must be tested for confined spaces atmospheric hazards prior to entry. Excavations should not be entered if other means are available to perform the task requiring entry. If entry into an excavation is required, the atmosphere within the space must be monitored by a trained person to assure that oxygen concentrations are at greater than or equal to 19.5 percent, that combustible gas levels are less than 10 percent, and that vapor levels are within applicable safe exposure (PEL and TLV) limits.

A ladder or similar means of egress must be located in excavations greater than 4 feet in depth so as to require no more than 25 feet of lateral travel for employees. *No person should be allowed to enter an excavation in type B or C soil greater than 5 feet in depth unless the walls of the excavation have been protected using an approved shield (trench box), an approved shoring system, or the walls have been sloped back to an angle of 34 degrees, the excavation is free of accumulated water, and the excavation has been tested for hazardous atmospheres* as noted previously. If personnel enter an excavation, the spoils pile and all materials must be placed at least 2 feet from the edge of the excavation to prevent the materials from rolling into the excavation. *Personnel must remain at least 2 feet away from the edge of the excavation at all times.* Upon completion of a test pit exploration, the excavation should be backfilled and graded. Excavation should never be left open unless absolutely necessary, and then only with proper barricading and controls to prevent accidental injury.

- Underground Utilities and Hazards.** The identification of underground storage tanks (USTs), pipes, utilities and other underground hazards is critically important prior to all drilling, excavating and other intrusive activities. In accordance with OSHA 29 CFR 1926.650, *the estimated location of utility installations, such as sewer, telephone, electric, water lines and other underground installations that may reasonably be expected to be encountered during excavation work, must be determined* prior to opening an excavation. The same requirements apply to drilling operations and the use of soil-gas probes. Where public utilities may exist, the utility agencies or operators must be contacted directly or through a utility-sponsored service such as *Dig-Safe*. Where other underground hazards may exist, reasonable attempts must be made to identify their locations as well. *Failure to identify underground hazards can lead to fire, explosion, flooding, electrocution or other life threatening accidents.*

- Water Hazards and Boat Sampling.** The collection of water or sediment samples on or immediately adjacent to a body of water can pose significant hazards. In addition to the slip, trip and fall hazards associated with wet surfaces, the potential for drowning accidents must be recognized. These hazards can be intensified by the use of some personnel protective equipment (PPE), particularly if respiratory protection is worn. OSHA 29 CFR 1926.106 requires that all employees working over or near water, where the danger of drowning exists, *must wear a U.S. Coast Guard-approved life jacket or buoyant work vest.* Ring buoys and emergency standby personnel must also be in place.

HAZARD ASSESSMENT: CHEMICAL HAZARDS AND RELATED CONCERNS

- Chemicals Subject to OSHA Hazard Communication.** All chemicals used in field activities such as solvents, reagents, decontamination solutions, or any other hazardous chemical must be listed and accompanied by the required labels, Material Safety Data Sheets (MSDS), and employee training documentation (OSHA 1910.1200). For additional information refer to ECS's **Hazard Communication Program** contained in the Health and Safety Program manual.

- Asbestos.** Disturbance of building materials in buildings built prior to 1980 must be evaluated for the presence of asbestos-containing materials by an accredited ECS inspector. The inspection and/or removal of asbestos-based or asbestos-containing building materials is regulated by some major cities and several states. Regulations require individuals who conduct building inspections for the presence of asbestos or collect samples of asbestos containing materials to be licensed or certified. ECS employees must determine the applicability of these regulations prior to any activities involving asbestos. The primary health effects of asbestos exposure include asbestosis (a scarring of the lungs), lung cancer, mesothelioma and other forms of cancer. Exposure to asbestos is regulated by a comprehensive OSHA standard (29 CFR 1910.1001).

- BTEX Compounds.** Exposure to the vapors of **benzene, ethyl benzene, toluene and xylenes** above their respective permissible exposure limits (PELs), as defined by the Occupational Safety and Health Administration (OSHA), may produce irritation of the mucous membranes of the upper respiratory tract, nose and mouth. Overexposure may also result in the depression of the central nervous system. Symptoms of such exposure include drowsiness, headache, fatigue and drunken-like behavior. Benzene has been determined to be carcinogenic, targeting blood-forming organs and bone marrow. The odor threshold for benzene is higher than the PEL and employees may be overexposed to benzene without sensing its presence, therefore, detector tubes must be utilized to evaluate airborne concentrations.

The vapor pressures of these compounds are high enough to generate significant quantities of airborne vapor. On sites where high concentrations of these compounds are present, a potential inhalation hazard to the field team during subsurface investigations can result. However, if the site is open and the anticipated quantities of BTEX contamination are small (i.e., part per million concentrations in the soil or groundwater), overexposure potential will also be small.

Carbon Monoxide. Carbon monoxide (CO) is a gas usually formed by the incomplete combustion of various fuels. Welding, cutting and the operation internal combustion engines can produce significant quantities of CO. Amounts of CO can quickly rise to hazardous levels in poorly ventilated areas. CO is odorless and colorless. It cannot be detected without appropriate monitoring equipment. LEL/O₂ meters and H-Nu/photoionizing detectors are not appropriate for the detection of CO. A direct reading instrument, calibrated for CO, should be used. Common symptoms of overexposure include pounding of the heart, a dull headache, flashes before the eyes, dizziness, ringing in the ears and nausea. These symptoms must not be relied upon in place of an appropriately calibrated monitoring instrument. Exposures should not exceed 15 ppm. Exposures above 15 ppm require the use of supplied air respirators. Air purifying respirators are not approved for protection against CO.

Chlorinated Organic Compounds. Exposure to the vapors of many chlorinated organic compounds such as vinyl chloride, tetrachloroethylene, 1,1,1-trichloroethane, trichloroethylene and 1,2-dichloroethylene above their respective permissible exposure limits (PELs) will result in similar symptoms. The actual PELs as set by the Occupational Safety and Health Administration (OSHA) vary depending on the specific compound. Overexposure to the vapor of these compounds can cause irritation of the eyes, nose and throat. The liquid if splashed in the eyes, may cause burning irritation and damage. Repeated or prolonged skin contact with the liquid may cause dermatitis. Acute overexposure to chlorinated hydrocarbons depresses the central nervous system exhibiting such symptoms as drowsiness, dizziness, headache, blurred vision, uncoordination, mental confusion, flushed skin, tremors, nausea, vomiting, fatigue and cardiac arrhythmia. Alcohol may make symptoms of overexposure worse. If alcohol has been consumed, the overexposed worker may become flushed. Some of these compounds are considered to be potential human carcinogens. Exposure to *vinyl chloride* is regulated by a comprehensive OSHA standard (29 CFR 1910.1017).

Chromium Compounds. Hexavalent chromium compounds, upon contact with the skin can cause ulceration and possibly an allergic reaction. Inhalation of hexavalent chromium dusts is irritating and corrosive to the mucous membranes of the upper respiratory tract. Chrome ulcers and chrome dermatitis are common occupational health effects from prolonged and repeated exposure to hexavalent chromium compounds. Acute exposures to hexavalent chromium dusts may cause coughing or wheezing, pain on deep inspiration, tearing, inflammation of the conjunctiva, nasal itch and soreness or ulceration of the nasal septum. Certain forms of hexavalent chromium have been found to cause increased respiratory cancer among workers.

Trivalent chromium compounds (chromic oxide) are generally considered to be of lower toxicity, although dermatitis may occur as a result of direct handling.

Fuel Oil. See Petroleum Hydrocarbons (PHC)

Gasoline. See BTEX Compounds, and Tetraethyl and Tetramethyl Lead.

Herbicides. Some of the commonly used herbicides present a low toxicity to man. However, other herbicides pose more serious problems. Organophosphorus and carbamate herbicides, if inhaled or ingested can interfere with the functioning of the central nervous system. Many herbicides can be readily absorbed through the skin to cause systemic effects. In addition to being absorbed through the skin, many herbicides, upon contact with the skin, may cause discoloring, skin irritation or dermatitis. Contaminants of commercial preparations of chlorinated phenoxy herbicides such as 2,4,5-T include 2,3,7,8-tetrachlorodibenzo-p-dioxin (dioxin). Dioxin is a known mutagen and a suspect carcinogen.

Hydrogen Sulfide (H₂S). Hydrogen sulfide, characterized by its "rotten egg" odor, is produced by the decomposition of sulfur-containing organic matter. It is found in many of the same areas where methane is found such as landfills, swamps, sewers and sewer treatment facilities. An important characteristic of H₂S is its ability to cause a decrease in ones ability to detect its presence by smell. So although one may no longer be able to smell it, it could still be present in harmful concentrations.

The symptoms of over exposure include headache, dizziness, staggering and nausea. Severe over exposure can cause respiratory failure, coma, and death. The current OSHA PEL is 10 ppm as an 8-hour TWA. The ACGIH TLV is the same.

Lead Paint. The inspection and/or removal, sanding, grinding, etc. of lead-based or lead-containing paints is now strictly regulated by OSHA. States may require individuals who conduct lead paint inspections or collect samples of lead paint to be licensed or certified. ECS employees must determine the applicability of these regulations prior to any activities involving lead paint. For additional health information, see Metal Compounds.

Metal Compounds. Overexposure to metal compounds has been associated with a variety of local and systemic health hazards, both acute and chronic in nature, with chronic effects being most significant. Direct contact with the dusts of some metal compounds can result in contact or allergic dermatitis. Repeated contact with arsenic compounds may result in hyperpigmentation. Cases of skin cancer due to the trivalent inorganic arsenic compounds have been documented. The moist mucous membranes, particularly the conjunctivae, are most sensitive to the irritating effects of arsenic. Copper particles embedded in the eye result in a pronounced foreign body reaction with a characteristic discoloration of eye tissue.

Inhalation of copper and zinc dusts and fumes above their established PELs may result in flu-like symptoms known as "metal fume fever." Prolonged and repeated inhalation of the dusts of inorganic arsenic compounds above the established PEL may result in weakness, loss of

appetite, a sense of heaviness in the stomach and vomiting. Respiratory problems such as cough, hoarseness and chest pain usually precede the gastrointestinal problems. Chronic overexposure to the dusts of inorganic arsenic may result in lung cancer.

The early symptoms of lead poisoning are usually nonspecific. Symptoms include sleep disturbances, decreased physical fitness, headache, decreased appetite and abdominal pains. Chronic overexposure may result in severe colic and severe abdominal cramping. The central nervous system (CNS) may also be adversely effected when lead is either inhaled or ingested in large quantities for extended periods of time. The peripheral nerve is usually affected. "Wrist drop" is peculiar to such CNS damage. Lead has also been characterized as a male and female reproductive toxin as well as a fetotoxin. Exposure to lead (Pb) is regulated by a comprehensive OSHA standard (29 CFR 1910.1025).

- Methane.** Methane is an odorless, colorless, tasteless, gas that cannot be detected by an H-Nu or similar photoionizing detector (PID). When present in high concentrations in air, methane acts primarily as a simple asphyxiant without other significant physiologic effects. Simple asphyxiants dilute or displace oxygen below that required to maintain blood levels sufficient for normal tissue respiration.

Methane has a lower explosive limit (LEL) of 5 percent and an upper explosive limit (UEL) of 15 percent. The LEL of a substance is the minimum concentration of gas or vapor in air below which the substance will not burn when exposed to a source of ignition. This concentration is expressed in percent by volume. Below this concentration, the mixture is "too lean" to burn or explode. The UEL of a substance is the maximum concentration of gas or vapor in air above which the substance will not burn when exposed to a source of ignition. Above this concentration, the mixture is "too rich" to burn or explode. The explosive range is the range of concentrations between the LEL and UEL where the gas-air mixture will support combustion. For methane this range is 5 to 15 percent.

- Pesticides.** Pesticides can be grouped into three major categories: organophosphates, carbamate and chlorinated hydrocarbons. The actual permissible exposure limits (PELs) as set by the Occupational Safety and Health Administration (OSHA), vary depending on the specific compound. Organophosphates, including Diazinon, Malathion and Parathion, are quickly absorbed into the body by inhalation, ingestion and direct skin contact. The symptoms of exposure include headache, fatigue, dizziness, blurred vision, sweating, cramps, nausea and vomiting. More severe symptoms can include tightness of the chest, muscle spasms, seizures and unconsciousness. It should also be noted that the Malathion and Parathion PELs both carry the *Skin* notation, indicating that these compounds adversely effect or penetrate the skin. OSHA specifies that skin exposure to substances carrying this designation be prevent or reduced through the use of the appropriate personal protective equipment (PPE).

Chlorinated Hydrocarbons such as Chlordane, DDT and Heptachlor can cause dizziness, nausea, abdominal pain and vomiting. The more severe symptoms include epileptic like seizures, rapid heart beat, coma and death. These compounds also carry the OSHA *Skin* notation. The symptoms of exposure to carbamate such Carbaryl (also known as Sevin) are similar to those described for the organophosphates. However, the OSHA exposure limit for Carbaryl *does not* carry the Skin notation.

- Petroleum Hydrocarbons (PHCs).** Petroleum Hydrocarbons such as fuel oil are generally considered to be of low toxicity. Recommended airborne exposure limits have not been established for these vapors. However, inhalation of low concentrations of the vapor may cause mucous membrane irritation. Inhalation of high concentrations of the vapor may cause pulmonary edema. Repeated or prolonged direct skin contact with the oil may produce skin irritation as a result of defatting. Protective measures, such as the wearing of chemically resistant gloves, to minimize contact are addressed elsewhere in this plan. Because of the relatively low vapor pressures associated with PHCs, an inhalation hazard in the outdoor environment is not likely.

- Polychlorinated Biphenyls (PCBs).** Prolonged skin contact with PCBs may cause the formation of comedones, sebaceous cysts, and/or pustules (a condition known as chloracne). PCBs are considered to be suspect carcinogens and may also cause reproductive damage.

The OSHA permissible exposure limits (PELs) for PCBs are as follows:

<i>Compound</i>	<i>PEL (8-hour time-weighted average)</i>
Chlorodiphenyl (42% Chlorine)	1 mg/m ³ -Skin
Chlorodiphenyl (54% Chlorine)	0.5 mg/m ³ -Skin

It should be noted that PCBs have extremely low vapor pressures (0.001 mm Hg @ 42% Chlorine and 0.00006 mm Hg @ 54% Chlorine). This makes it unlikely that any significant vapor concentration (i.e., exposures above the OSHA PEL) will be created in the ambient environment. This minimizes the potential for any health hazards to arise due to inhalation unless the source is heated or generates an airborne mist. If generated, vapor or mists above the PEL may cause irritation of the eyes, nose, and throat. The exposure limits noted above are considered low enough to prevent systemic effects but it is not known if these levels will prevent local effects. It should also be noted that both PELs carry the *Skin* notation, indicating that these compounds adversely effect or penetrate the skin. OSHA specifies that skin exposure to substances carrying this designation be prevented or reduced through the use of the appropriate personal protective equipment (PPE).

- Polycyclic Aromatic Hydrocarbons (PAHs).** Due to the relatively low vapor pressure of PAH compounds, vapor hazards at ambient temperatures are not expected to occur. However, if site conditions are dry, the generation of contaminated dusts may pose a potential inhalation hazard. Therefore dust levels should be controlled with wetting if necessary. Repeated contact with certain PAH compounds has been associated with the development of skin cancer. Contact of PAH compounds with the skin may cause photosensitization of the skin, producing skin burns after subsequent exposure to ultraviolet radiation. Protective measures, such as the wearing of chemically resistant gloves, are appropriate when handling PAH contaminated materials.

- Tetraethyl and Tetramethyl Lead.** Both compounds are used as anti-knock ingredients in gasoline. The inhalation of tetraethyl lead dusts may result in irritation of the respiratory tract. This dust, when in contact with moist skin or eye membranes, may cause itching, burning and transient redness.

The direct absorption of a sufficient quantity of tetraethyl lead, whether briefly at a high rate, or for prolonged periods at a low rate, may cause acute intoxication of the central nervous system. Mild degrees of intoxication may cause headache, anxiety, insomnia, nervous excitation and minor gastrointestinal disturbances.

- Volatile Organic Compounds (VOCs).** See BTEX compounds and Chlorinated Organic Compounds.

- Waste Oil.** See Petroleum Hydrocarbons (PHCs) and Cutting Oil.

HAZARD ASSESSMENT: BIOLOGICAL HAZARDS AND RELATED CONCERNS

- Insects.** Insects represent significant sources (vectors) of disease transmission. Therefore, precautions to avoid or minimize potential contact should be considered prior to all field activities. Disease or harmful effects can be transmitted through bites, stings or through direct contact with insects or through ingestion of foods contaminated by certain insects. Examples of disease transmitted by insect bites include encephalitis and malaria from contaminated mosquitoes, lyme disease and spotted fever from contaminated ticks. Stinging insects, such as bees and wasps, are prevalent throughout the country, particularly during the warmer months. The stings of these insects can be painful, and cause serious allergic reactions to some individuals.

- Lyme Disease.** Lyme disease is an infection caused by the bite of certain ticks, primarily deer, dog and wood ticks. The symptoms of Lyme disease usually start out as a skin rash then progress to more serious symptoms. The more serious symptoms can include lesions, headaches, arthritis and permanent damage to the neurological system. If detected early the disease can be treated successfully with antibiotics. The following steps are recommended for prevention of lyme disease and other diseases transmitted by ticks: a) Beware of tall grass, bushes, woods and other areas where ticks may live; b) *Wear good shoes, long pants tucked into socks, a shirt with a snug collar, good cuffs around the wrists and tails tucked into the pants. Insect/tick repellents may also be useful;* c) *Carefully monitor for the presence of ticks. Carefully inspect clothes and skin when undressing. If a tick is attached to the skin it should be removed with fine tipped tweezers. You should be alert for early symptoms over the next month or so. If you suspect that you have been bitten by a tick you should contact a physician for medical advice.*

- Medical Wastes and Bloodborne Diseases.** Any field activity where exposure to medical wastes or other sources of bloodborne pathogens, including first aid, can be reasonably anticipated must be conducted in accordance with the OSHA (29 CFR 1910.1030) *Bloodborne Pathogens* standard. According to the OSHA definition, Bloodborne Pathogens means pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include but are not limited to *hepatitis B virus (HBV)* and *human immunodeficiency virus (HIV)*. Wherever there is a potential for employee skin, eye, mucous membrane, or parenteral (skin or membrane piercing) contact with blood or other potentially infectious sources, *employees must refer to the ECS Written Exposure Control Plan.*

- Poisonous Plants.** The possible presence of poisonous plants should be anticipated for field activities in wooded or heavily vegetated areas. *Poison ivy* is a climbing plant with alternate green to red leaves (arranged in threes) and white berries. *Poison oak* is similar to poison ivy and *sumac* but its leaves are oak-like in form. The leaves of these poisonous plants produce an irritating oil which causes an intensely itching skin rash and characteristic blister-like lesions. Contact with these plants should be avoided.

- Rats, Snakes and Other Vermin.** Certain animals, particularly those that feed on garbage and other wastes, can represent significant sources (vectors) of disease transmission. Therefore, precautions to avoid or minimize potential contact with (biting) animals (such as rats) or animal waste (such as pigeon droppings) should be considered prior to all field activities. Rats, snakes and other wild animals can inflict painful bites. The bites can be poisonous (as in the case of some snakes), or disease causing (as in the case of rabid animals). Avoidance of these animals is the best protection.

- Waste Water and Sewage.** Sewage and waste water contaminated with raw, untreated sewage can represent significant sources of bacterial, viral or fungal contamination. Adverse effects, due to contact, can range from mild skin reactions or rashes to life threatening diseases. Diseases are easily transmitted by accidental ingestion or through skin contact, particularly if the skin is broken. Avoidance of direct contact and good personal hygiene are the best protection from these hazards.

EVALUATION OF POTENTIAL PUBLIC EXPOSURE TO HAZARDS

The assessment activities are not anticipated to occur off-site. The site is not secure; therefore bystanders and people not involved with the assessment could access the site during non-assessment times. Those people include bystanders and landscape contractors to mow the grass. At times when assessment activities are not occurring, contaminated soil and/or groundwater will not be accessible due to their location below the top one to two feet of soil or disposed off in an on-site labeled drum located in an inconspicuous area of the property. The following lists the potential hazards which could be exposed to the community and the actions which will occur to limit the hazards.

- Electrical.** OSHA regulations require that employees who may be exposed to electrical equipment be trained to recognize the associated hazards and the appropriate control methods. All **extension cords** used for portable tools or other equipment must be designed for hard or extra usage and be (three-wire) grounded. All 120-volt, single-phase 15- and 20-ampere receptacle outlets on construction sites, and other locations where moisture/water contact may occur, must be equipped with **ground-fault circuit interrupters (GFCI)** units. GFCI units must be attached directly to or as close as possible to the receptacle. GFCI located away from the receptacle will not protect any wiring between the receptacle and the GFCI unit. Only the wiring plugged into the GFCI and outward will be protected by the GFCI. All **(temporary lighting)** lamps for general illumination must be protected from accidental breakage. Metal case sockets must be grounded. Portable lighting in wet or conductive locations should be 12 volts or less.
- Fire and Explosion.** The possibility of flammable materials being encountered during field activities must be recognized and the appropriate steps necessary to minimize fire and explosion must be observed. A fire and explosion could affect the nearby properties due to damage to the properties or a disruption in traffic patterns. A fire and explosion risk could be present in situations where *excessive organic vapors, free product or methane* are, or may be, encountered. When this occurs, monitoring with a combustible gas indicator (CGI) or organic vapor analyzer (OVA) is required. ECS has not encountered excessive organic vapors, free product or methane at the site. If encountered, ECS will use an OVA or CGI to monitor the vapors.
- Moving Vehicles, Traffic Safety.** The site is located on a busy road without a traffic light for ingress or egress. Additionally, a sidewalk is located parallel to the site, along Wrightsville Avenue. Vehicles entering and leaving the site have the potential to cause accidents with vehicles and pedestrians along Wrightsville Avenue. In order to minimize the risk, the locations of ingress and egress will be limited and if necessary, traffic control measures can be implemented. OSHA 1926.201 specifies that when signs, signals or barricades do not provide adequate protection from highway or street traffic, flagmen must be utilized. *Flagmen must wear red or orange garments. Garments worn at night must be reflective.*
- Noise.** Noise exposure can be affected by many factors including the number and types of noise sources (continuous vs. intermittent or impact), and the proximity to noise intensifying structures such as walls or buildings which cause noise to bounce back or echo. The single most important factor effecting total noise exposure is distance from the source. The closer one is to the source the louder the noise. The operation of a drill rig, backhoe or other mechanical equipment can be sources of significant noise exposure. The source can not be removed; however, operations which could cause elevated noise exposure will be performed during day time hours, to reduce the likelihood of negative effect on nearby residence.
- Pedestrian Traffic.** The uncontrolled presence of pedestrians on a drilling or excavation site can be hazardous to both pedestrians and site workers. Prior to the initiation of site activities, the site should be surveyed to determine if, when and where pedestrian may gain access. This includes walkways, parking lots, gates and doorways. Barriers or caution tape should be used to exclude all pedestrian traffic. *Exclusion of pedestrian traffic is intended to prevent injury to the pedestrians and eliminate distractions which could cause injury to ECS personnel or other site workers.*
- Test Pit and/or other Excavations.** Excavations could be necessary along Wrightsville Avenue. The excavation could have the potential to negatively affect the traffic flow along Wrightsville Avenue and affect the structural integrity of the roadway and utilities located along the roadway. If needed, ECS will coordinate excavation activities with appropriate municipal personnel and utility locating contractors. In addition, ECS will attempt to maintain a distance of five to ten feet from the roadway.
- Underground Utilities and Hazards.** The identification of underground storage tanks (USTs), pipes, utilities and other underground hazards is critically important prior to all drilling, excavating and other intrusive activities. If underground utilities are damaged, the damage could affect surrounding properties connected to the damaged utilities. In accordance with OSHA 29 CFR 1926.650, *the estimated location of utility installations, such as sewer, telephone, electric, water lines and other underground installations that may reasonably be expected to be encountered during excavation work, must be determined* prior to opening an excavation. The same requirements apply to drilling operations and the use of soil-gas probes. Where public utilities may exist, the utility agencies or operators must be contacted directly or through a utility-sponsored service such as *Dig-Safe*. Where other underground hazards may exist, reasonable attempts must be made to identify their locations as well. *Failure to identify underground hazards can lead to fire, explosion, flooding, electrocution or other life threatening accidents.*
- Chemicals Subject to OSHA Hazard Communication.** All chemicals used in field activities such as solvents, reagents, decontamination solutions, or any other hazardous chemical must be listed and accompanied by the required labels, Material Safety Data Sheets (MSDS),

and employee training documentation (OSHA 1910.1200). The materials will be stored in manner to limit or prevent access to unauthorized individuals. The materials will be stored in a manner to limit or prevent accidental release onto the site. Chemicals potentially used as part of the remedial assessment activities include petroleum, hydrochloric acid sample preservative, nitric acid sample preservative, methanol and sodium bisulfate sample preservative.

- BTEX Compounds.** Exposure to the vapors of **benzene, ethyl benzene, toluene and xylenes** above their respective permissible exposure limits (PELs), as defined by the Occupational Safety and Health Administration (OSHA), may produce irritation of the mucous membranes of the upper respiratory tract, nose and mouth. Overexposure may also result in the depression of the central nervous system. Symptoms of such exposure include drowsiness, headache, fatigue and drunken-like behavior. Benzene has been determined to be carcinogenic, targeting blood-forming organs and bone marrow. The odor threshold for benzene is higher than the PEL and employees may be overexposed to benzene without sensing its presence, therefore, detector tubes must be utilized to evaluate airborne concentrations.

The vapor pressures of these compounds are high enough to generate significant quantities of airborne vapor. On sites where high concentrations of these compounds are present, a potential inhalation hazard to the field team and nearby bystanders during subsurface investigations can result. However, if the site is open and the anticipated quantities of BTEX contamination are small (i.e., part per million concentrations in the soil or groundwater), overexposure potential will also be small. ECS has not encountered large concentrations of BTEX and the site is an open site. Therefore, the potential for community exposure is small.

- Metal Compounds.** Overexposure to metal compounds has been associated with a variety of local and systemic health hazards, both acute and chronic in nature, with chronic effects being most significant. Direct contact with the dusts of some metal compounds can result in contact or allergic dermatitis. Repeated contact with arsenic compounds may result in hyperpigmentation. Cases of skin cancer due to the trivalent inorganic arsenic compounds have been documented. The moist mucous membranes, particularly the conjunctivae, are most sensitive to the irritating effects of arsenic. Copper particles embedded in the eye result in a pronounced foreign body reaction with a characteristic discoloration of eye tissue.

Inhalation of copper and zinc dusts and fumes above their established PELs may result in flu-like symptoms known as "metal fume fever." Prolonged and repeated inhalation of the dusts of inorganic arsenic compounds above the established PEL may result in weakness, loss of appetite, a sense of heaviness in the stomach and vomiting. Respiratory problems such as cough, hoarseness and chest pain usually precede the gastrointestinal problems. Chronic overexposure to the dusts of inorganic arsenic may result in lung cancer.

The early symptoms of lead poisoning are usually nonspecific. Symptoms include sleep disturbances, decreased physical fitness, headache, decreased appetite and abdominal pains. Chronic overexposure may result in severe colic and severe abdominal cramping. The central nervous system (CNS) may also be adversely effected when lead is either inhaled or ingested in large quantities for extended periods of time. The peripheral nerve is usually affected. "Wrist drop" is peculiar to such CNS damage. Lead has also been characterized as a male and female reproductive toxin as well as a fetotoxin. Exposure to lead (Pb) is regulated by a comprehensive OSHA standard (29 CFR 1910.1025). Metal compounds have been identified in the buried site soils. These soils are not accessible to the public and are either buried or stored in a 55-gallon drum marked non-hazardous waste located on the back of the property.

- Petroleum Hydrocarbons (PHCs).** Petroleum Hydrocarbons such as fuel oil are generally considered to be of low toxicity. Recommended airborne exposure limits have not been established for these vapors. However, inhalation of low concentrations of the vapor may cause mucous membrane irritation. Inhalation of high concentrations of the vapor may cause pulmonary edema. Repeated or prolonged direct skin contact with the oil may produce skin irritation as a result of defatting. Protective measures, such as the wearing of chemically resistant gloves, to minimize contact are addressed elsewhere in this plan. Because of the relatively low vapor pressures associated with PHCs, an inhalation hazard in the outdoor environment is not likely. The site is an outdoor environmental and non-site required personnel will not be allowed on-site during assessment field activities which could provide vapor release.

- Polycyclic Aromatic Hydrocarbons (PAHs).** Due to the relatively low vapor pressure of PAH compounds, vapor hazards at ambient temperatures are not expected to occur. However, if site conditions are dry, the generation of contaminated dusts may pose a potential inhalation hazard. Therefore dust levels should be controlled with wetting if necessary to reduce and minimize dust migration offsite.

PLAN SIGN-OFF

(Please sign and date. See page 3 for Acknowledgment and Approval scope.)

SS/PM: _____

HSC: _____

- | | |
|---------------------------|---|
| Attachments: Attachment A | Site Inspection Log |
| Attachment B | Health and Safety Briefing/Site Orientation Record/Hazard Communication |
| Attachment C | Subcontractor's Statement of Understanding |
| Attachment D | Incident Report and/or Discovery of a Potential Hazard |

Attach additional information if required.

(Revised 9/97)

Attachment A Site Inspection Log

PROJECT NAME:	LOCATION:
PROJECT NUMBER:	DATE:
PROJECT MANAGER:	COMPLETED BY:
SITE DESCRIPTION AND NATURE OF WORK:	

HAZARD COMMUNICATION

- Chemical hazards identified
- All containers properly labeled
- MSDS/workplace notebook on site
- Site safety briefing completed and documented

ACCIDENTS/EMERGENCY INFO

- First aid personnel identified
- Hospital location identified
- Police/Fire/Ambulance phone numbers available
- Incident investigation forms available
- Fire extinguisher present

SANITATION

- Washing facilities available
- Toilet facilities available
- Approved trash receptacle available
- Water/refreshments available

STORAGE

- Tools/Drill tooling/supplies safely stacked to prevent rolling or collapse
- Work areas and passage ways kept clear

HOUSEKEEPING

- Work areas clean and orderly
- Storage areas clean and orderly
- Combustible scrap/debris removed regularly
- Waste containers of flammable or toxic materials covered

OVERHEAD HAZARDS

- 15^{ft} minimum clearance maintained
- All sources of falling objects/swinging loads/rotating equipment identified
- Barriers or other methods in place to prevent injury due to overhead hazards

POSTING

- Emergency phone/contact info posted
- OSHA poster displayed

UNDERGROUND HAZARDS

- All underground hazards identified and communicated to workers on site
- Utility/Dig-Safe clearance confirmed
- Clearance dates: _____
- Clearance ID#: _____

EXCAVATIONS and TRENCHES

- All personnel and storage at least 2^{ft} from top edge of excavation
- Ladder in place
- Guarding/barriers in place

VEHICULAR TRAFFIC

- All vehicular traffic routes which could impact worker safety identified and communicated
- Barriers or other methods established to prevent injury from moving vehicles

PEDESTRIAN TRAFFIC/SITE CONTROL

- All walkways which could be impacted by site activities identified and communicated
- Barriers or other methods established to prevent pedestrian injury from site activities

ENVIRONMENTAL HAZARDS

- Poisonous plants/stinging or biting insects/vermin/sewage/etc. identified and communicated

COMMENTS/OTHER HAZARDS _____

x = OK

NA = Not Applicable

Attachment C
Subcontractor's Statement of Understanding
Regarding Health and Safety Responsibilities

Project Name: _____

Project Number: _____

In accordance with generally accepted practices, each Subcontractor engaged by ECS is responsible for all matters relating to the health and safety of its personnel and equipment in performance of the work. This includes recognition of the potential health and safety hazards associated with the work. ECS will establish a health and safety plan or program (HASP) applicable to its own employees and its own activities on site. ECS will make its HASP available to each subcontractor for informational purposes only. Each subcontractor must establish a HASP applicable to its own employees and its own activities on site.

Subcontractors who use ECS's HASP as a model for their own HASP are responsible for determining its adequacy and applicability to its own employees and its own activities on site. Subcontractors must establish their own HASP applicable to subcontractor employees and/or activities, even if modeled after ECS's HASP and deliver this HASP in clear written form to ECS prior to the initiation of on-site activities. Submittal of the subcontractor's HASP to ECS will be for informational purposes only. Review of the subcontractor's HASP by ECS shall in no way constitute approval or endorsement by ECS of the subcontractor's HASP. It is understood that protective measures specified in the Subcontractor's HASP are minimum requirements for the work.

Subcontractor warrants that all its employees that are permitted to engage in operations that could expose them to hazardous wastes, hazardous substances, or safety or health hazards have obtained the necessary health and safety training and medical surveillance as specified in the applicable provisions of OSHA:

1926.59 Hazard Communication,
1926.52 Occupational Noise Exposure,
1926.103 Respiratory Protection,
1926.65 Hazardous Waste Operations and Emergency Response;

as well as any other applicable portion of the OSHA General Industry (29 CFR 1910) and Construction Industry (29 CFR 1926) Standards. Subcontractor shall provide ECS with evidence of the necessary certification before beginning hazardous waste work subject to OSHA 1926.65 on the project site.

Should ECS become aware of subcontractor activities on site which appear to violate OSHA or other applicable safety regulations or otherwise pose an immediate and serious threat to the safety of ECS employees, subcontractor employees, other individuals on site, or members of the public, ECS may notify the subcontractor verbally and/or in writing regarding the need for corrective action. Failure to comply with either general safety practices or health and safety practices as described above may be grounds for breach and prompt contract termination. The safety requirements of the work as described above apply without regard to time, place, or presence of a ECS representative.

THE PRESENCE OF ECS PERSONNEL ON THE SITE CARRYING OUT PROFESSIONAL ACTIVITIES DOES NOT MEAN THAT ECS UNDERTAKES TO OVERSEE THE SUBCONTRACTOR'S COMPLIANCE RESPONSIBILITIES.

The undersigned agrees that he is authorized to execute this statement of understanding on behalf of their firm:

Firm: _____

Name (Print): _____ Title: _____

Signature: _____ Date: _____

Attachment D
Incident Report And/Or Discovery Of A Potential Hazard

CHECK ALL THAT APPLY: Hazard Identified Injury/Illness Property Damage

Project Name: _____ Project Number: _____ Today's Date _____

Date and Time Incident Occurred: _____ Site Supervisor's Name: _____

1) Describe the incident or potential hazard: _____

2) Machine or tools involved: _____

3) Names of employees involved in incident: _____

4) What personal protective was being worn when incident occurred? _____

5) Please answer the following four questions. For responses marked yes, please elaborate on the lines below.

Was anyone injured? Yes No Was first aid administered? Yes No

Was medical treatment sought? Yes No Was there property damage? Yes No

6) What steps were taken to prevent a reoccurrence? _____

7) What changes in process, procedure, or equipment would you recommend? _____

8) If the report is for an existing or potential hazard, has the entity controlling the hazard or potential hazard been notified in writing? Yes No

9) Additional comments _____

Name and signature of person preparing this form _____

Branch Office Manager:
Corporate Director of Health and Safety:

Health and Safety Coordinator:
Other:

Note: If the space provided on this form is insufficient, provide additional information on separate paper and attach. The completed investigation report

2501, 2503, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project Number 22-13842D



Photograph 1
View of the site, facing north (7/8/10).



Photograph 2
View of the site, facing east (7/8/10).

2501, 2503, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project Number 22-13842D



Photograph 3
View of the site, facing south (7/8/10).



Photograph 4
View of the site, facing west (7/8/10).

2501, 2503, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project Number 22-13842D



Photograph 5
View of on-site monitoring well MW-1 (7/8/10).



Photograph 6
View of typical site debris (7/8/10).

REMEDiating PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(b)(2)):

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Stephen E. Pike
(Name of Remediating Party Official)

* Stephen E. Pike
(Signature of Remediating Party Official)

* 7/12/10
Date

North Carolina (Enter State)

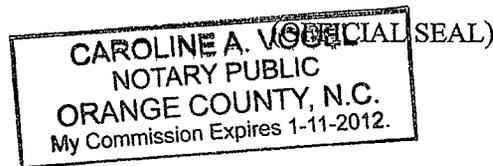
Orange COUNTY

I, Caroline A. Vogel, a Notary Public of said County and State, do hereby certify that Stephen E. Pike did personally appear and sign before me this day, produced proper identification in the form of NCDL, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 12th day of July, 2010.

Caroline A. Vogel
Notary Public (signature)

My commission expires: 1-11-2012



REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1)):

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

STEPHEN J. GOSSELIN
(Name of Registered Site Manager)

* [Signature]
(Signature of Registered Site Manager)

* 7/13/10
Date

North Carolina (Enter State)

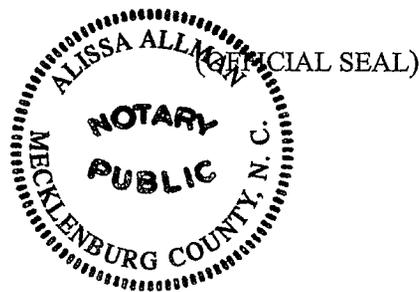
Mecklenburg COUNTY

I, Alissa Allman, a Notary Public of said County and State, do hereby certify that Stephen J. Gosselin did personally appear and sign before me this day, produced proper identification in the form of drivers license, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 13th day of July, 2010.

Alissa Allman
Notary Public (signature)

My commission expires: 3/13/2013





North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

June 15, 2010

Mr. Stephen Gosselin, P.G.
ECS Carolinas, LLP
8702 Red Oak Boulevard
Charlotte, NC 28217-5913

Re: REC Project Audit
Wrightsville Ave
Wilmington, New Hanover County, NC
Site ID No.: NONCD0002799

Dear Mr. Gosselin:

I am in the process of performing a technical audit of the project files and associated reports that have been submitted by ECS Carolinas, LLP (ECS) to the Registered Environmental Consultant (REC) Program of the Inactive Hazardous Sites Branch (Branch) for the Wrightsville Ave Site (Site). Be aware that I am not familiar with all technical aspects of the REC Program projects because oversight of the remedial activities is the responsibility of the Registered Site Manager (RSM). My review thus far indicates that either REC rule requirements have been omitted or clarification is needed. In order for me to complete this review, please provide any responses that you may have to the following comments:

1. In accordance with 15A NCAC 13C .0306(g)(9), a chronological listing of all previous owners and each period of ownership since the property was originally developed from pristine land is required for the Remedial Investigation (RI) Work Plan. However, your certified RI Work Plan received March 23, 2009 only includes ownership information since 1968. Please provide the required information and explain this omission.
2. Per .0306(g)(10), operational history with aerial photographs and Sanborn Fire Insurance maps to support land-use history are required. The RI Work Plan states "according to the Phase I ESA completed by ECS in March 2008, no Sanborn Fire Insurance Maps are available in the site area." However, the Phase I ESA included as Appendix B in the Work Plan includes several Sanborn maps. Please clarify and/or explain this statement.
3. Per .0306(g)(19), a health and safety plan (HASP) that assures the health and safety of nearby residential and business communities will not be adversely affected by activities related to the remedial investigation is required. While the RI Work Plan provides a "Community Health and Safety Plan" in Section U/Appendix F, the included HASP appears to be a standard "ECS Site-Specific" HASP. Please explain how the HASP constitutes a Health and Safety Plan that assures protection of the community.

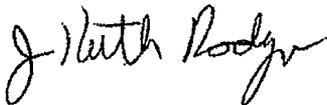
1646 Mail Service Center, Raleigh, North Carolina 27699-1646
Phone: 919-508-8400 \ FAX: 919-715-4061 \ Internet: www.wastenotnc.org

One
North Carolina
Naturally

4. Per .0306(h)(9), soil, groundwater, surface water and sediment contaminant delineation maps and cross sections, including scale and sampling points with contaminant concentrations are required in a RI Report. No such maps or cross-sections were included in your certified RI Report received July 2, 2009. Please provide the required information and explain this omission.
5. Per .0306(h)(11), color copies of site photographs are required in a RI Report. No site photographs were included in your RI Report. Please provide the required information and explain this omission.

Please provide any responses that you may have to the above itemized issues by July 15, 2010. You may incorporate your responses with your next quarterly status update letter. If you have any questions or would like to have a meeting to discuss this letter and the project, please contact me at (919) 508-8446.

Sincerely,



J. Keith Rodgers, P.G., Hydrogeologist
Registered Environmental Consultant Program
Inactive Hazardous Sites Branch
NC Division of Waste Management

cc: Mr. Stephen E. Pike, Investors Trust Company



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

*COPY
for file*

June 15, 2010

Mr. Stephen Gosselin, P.G.
ECS Carolinas, LLP
8702 Red Oak Boulevard
Charlotte, NC 28217-5913

Re: REC Project Audit
Wrightsville Ave
Wilmington, New Hanover County, NC
Site ID No.: NONCD0002799

Dear Mr. Gosselin:

I am in the process of performing a technical audit of the project files and associated reports that have been submitted by ECS Carolinas, LLP (ECS) to the Registered Environmental Consultant (REC) Program of the Inactive Hazardous Sites Branch (Branch) for the Wrightsville Ave Site (Site). Be aware that I am not familiar with all technical aspects of the REC Program projects because oversight of the remedial activities is the responsibility of the Registered Site Manager (RSM). My review thus far indicates that either REC rule requirements have been omitted or clarification is needed. In order for me to complete this review, please provide any responses that you may have to the following comments:

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2. Per .0306(g)(10), operational history with aerial photographs and Sanborne Fire Insurance maps to support land-use history are required. The RI Work Plan states "according to the Phase I ESA completed by ECS in March 2008, no Sanborn Fire Insurance Maps are available in the site area." However, the Phase I ESA included as Appendix B in the Work Plan includes several Sanborn maps. Please clarify and/or explain this statement.
3. Per .0306(g)(19), a health and safety plan (HASP) that assures the health and safety of nearby residential and business communities will not be adversely affected by activities related to the remedial investigation is required. While the RI Work Plan provides a "Community Health and Safety Plan" in Section U/Appendix F, the included HASP appears to be a standard "ECS Site-Specific" HASP. Please explain how the HASP constitutes a Health and Safety Plan that assures protection of the community.

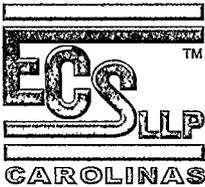
4. Per .0306(h)(9), soil, groundwater, surface water and sediment contaminant delineation maps and cross sections, including scale and sampling points with contaminant concentrations are required in a RI Report. No such maps or cross-sections were included in your certified RI Report received July 2, 2009. Please provide the required information and explain this omission.
5. Per .0306(h)(11), color copies of site photographs are required in a RI Report. No site photographs were included in your RI Report. Please provide the required information and explain this omission.

Please provide any responses that you may have to the above itemized issues by July 15, 2010. You may incorporate your responses with your next quarterly status update letter. If you have any questions or would like to have a meeting to discuss this letter and the project, please contact me at (919) 508-8446.

Sincerely,

J. Keith Rodgers, P.G., Hydrogeologist
Registered Environmental Consultant Program
Inactive Hazardous Sites Branch
NC Division of Waste Management

cc: Mr. Stephen E. Pike, Investors Trust Company



ECS CAROLINAS, LLP

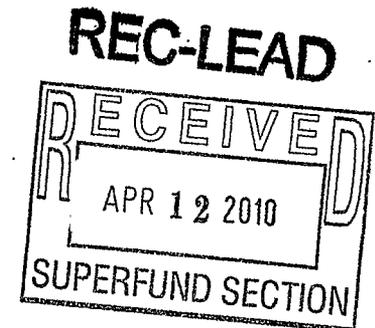
"Setting the Standard for Service"

Geotechnical • Construction Materials • Environmental • Facilities

April 5, 2010

Mr. J. Keith Rodgers
REC Program
Inactive Hazardous Sites Branch, Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Reference: First Quarter 2010 Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project 22-13842D



Dear Mr. Rodgers:

ECS Carolinas, LLP (ECS) has prepared the following First Quarter 2010 Status Report for the above referenced site. This is the Fifth Quarterly Status Report for this site since execution of the REC Administrative Agreement (AA) on December 10, 2008. ECS has finalized and submitted the Phase II Remedial Investigation Work Plan which included defining the horizontal and vertical extent of the polyaromatic hydrocarbon (PAH) contaminated soils and confirming and defining the lead and chromium concentrations in the groundwater. ECS previously completed the initial stage of soil sampling as part of the Phase II Remedial Investigation and installed two permanent groundwater monitoring wells with one sampling event to confirm the lead and chromium concentrations in the groundwater.

Since the previous quarterly status report, ECS prepared a Phase II Remedial Investigation Work Plan Addendum to include additional soil sampling to define the horizontal extent of the PAH contaminated soils and re-sample the on-site groundwater monitoring wells to determine if the lead and chromium concentrations are due to suspended sediment in the groundwater. ECS has performed the soil sampling which was described in the Phase II Remedial Investigation Work Plan Addendum. The soil sampling did not define the area of extent and an area of petroleum free product with soils impacted with PAHs and naphthalene's was encountered. The additional groundwater sampling for the work plan addendum is schedule for the week of April 5 through April 9, 2010.

Based on the current assessment schedule, the Phase I Remedial Investigation was completed in June 2009, approximately 6 months following execution of the AA. ECS has completed the initial sampling of Phase II of the Remedial Investigation by December 2009, which would be within 12 months of the executed AA. ECS is in the process of assessing the data for determination of additional sampling locations to define the site contamination. The additional assessment should be completed within an additional six months. This time frame would place completion of the remedial investigation within 22 months of execution of the AA. Based on this time frame, the work is in progress to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C.0302(h).

Quarterly Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
April 5, 2010

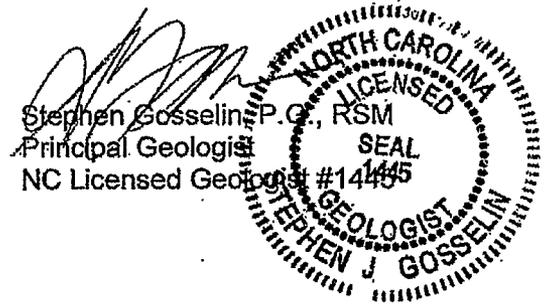
If you have any questions concerning this report or this project, please contact us at (910) 686-9114 or sgosselin@ecslimited.com.

Sincerely,
ECS CAROLINAS, LLP



Amy C. Conchas, REM
Environmental Department Manager

cc: Mr. Stephen Pike – Investors Trust Company



REMEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(b)(2)):

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Stephen E. Pike
(Name of Remediating Party Official)

* Stephen E. Pike
(Signature of Remediating Party Official)

* 4/7/10
Date

North Carolina (Enter State)

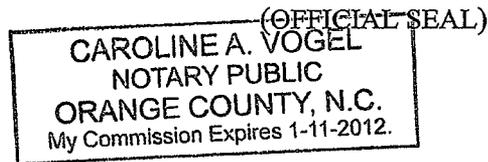
Orange COUNTY

I, Caroline A. Vogel, a Notary Public of said County and State, do hereby certify that Stephen E. Pike did personally appear and sign before me this day, produced proper identification in the form of _____, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 7th day of April, 2010.

Caroline A. Vogel
Notary Public (signature)

My commission expires: 1-11-2012.



REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1)):

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

STEPHEN J. GOSSELIN
(Name of Registered Site Manager)

* [Signature]
(Signature of Registered Site Manager)

* 4/9/10
Date

NORTH CAROLINA (Enter State)

MECKLENBURG COUNTY

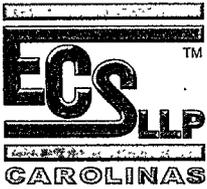
I, Alissa Allman, a Notary Public of said County and State, do hereby certify that Stephen J. Gosselin did personally appear and sign before me this day, produced proper identification in the form of drivers license, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 9th day of April, 2010.

Alissa Allman
Notary Public (signature)

My commission expires: 3/13/2013.





ECS CAROLINAS, LLP

Geotechnical • Construction Materials • Environmental • Facilities

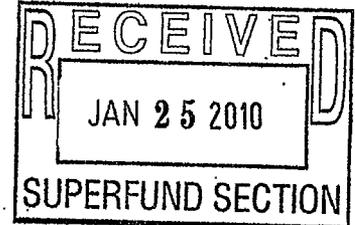
REC-LEAD

"Setting the Standard for Service"

January 08, 2010

Mr. Kim T. Caulk
REC Program
Inactive Hazardous Sites Branch, Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Reference: Fourth Quarter 2010 Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project 22-13842D



Dear Mr. Caulk:

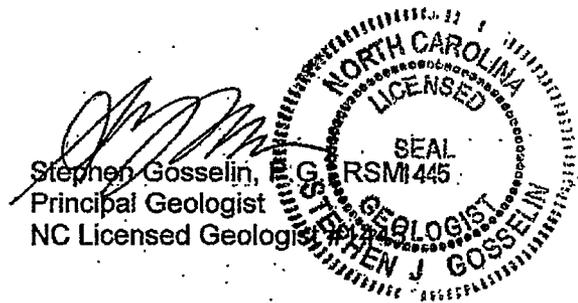
ECS Carolinas, LLP (ECS) has prepared the following Fourth Quarter 2009 Status Report for the above referenced site. This is the Fourth Quarterly Status Report for this site since execution of the REC Administrative Agreement (AA) on December 10, 2008. ECS has finalized and submitted the Phase II Remedial Investigation Work Plan, which included defining the horizontal and vertical extent of the polyaromatic hydrocarbon (PAH) contaminated soils and confirming and defining the lead and chromium concentrations in the groundwater. ECS has completed the initial stage of soil sampling as part of the Phase II Remedial Investigation. ECS has also installed two permanent groundwater monitoring wells and performed one sampling event to confirm the lead and chromium concentrations in the groundwater.

Based on the current assessment schedule, the Phase I Remedial Investigation was completed in June 2009, approximately 6 months following execution of the AA. ECS has completed the initial sampling of Phase II of the Remedial Investigation by December 2009, which would be within 12 months of the executed AA. ECS is in the process of assessing the data for determination of additional sampling locations to define the site contamination. The additional assessment should be completed within an additional six months. This time frame would place completion of the remedial investigation within 16 months of execution of the AA. Based on this time frame, the work is in progress to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C.0302(h).

If you have any questions concerning this report or this project, please contact us at (910) 686-9114 or sgosselin@ecslimited.com.

Sincerely,
ECS CAROLINAS, LLP

Amy C. Conchas, REM
Environmental Department Manager



cc: Mr. Stephen Pike – Investors Trust Company

REMIEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(b)(2)):

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Stephen E Pike
(Name of Remediating Party Official)

* Stephen E Pike
(Signature of Remediating Party Official)

* 1/11/2010
Date

North Carolina (Enter State)

Orange COUNTY

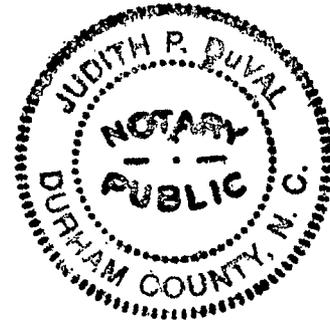
I, Judith P. DuVal, a Notary Public of said County and State, do hereby certify that Stephen E. Pike did personally appear and sign before me this day, produced proper identification in the form of personally known was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 11th day of January, 2010

Judith P. DuVal
Notary Public (signature)

My commission expires: 10/07/2013

(OFFICIAL SEAL)



REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1)):

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

STEPHEN J. GOSSELIN
(Name of Registered Site Manager)

* [Signature]
(Signature of Registered Site Manager)

* 1/18/2010
Date

NORTH CAROLINA (Enter State)

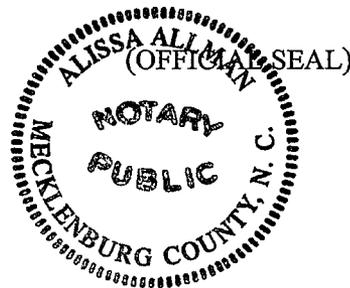
MECKLENBURG COUNTY

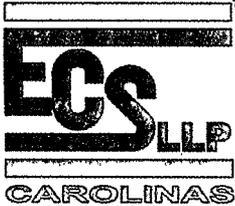
I, Alissa Allman, a Notary Public of said County and State, do hereby certify that Stephen J. Gosselin did personally appear and sign before me this day, produced proper identification in the form of drivers license, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 18th day of January, 2010.

Alissa Allman
Notary Public (signature)

My commission expires: 3/13/2013.





ECS CAROLINAS, LLP

7211 Odgen Business Park
Suite 201
Wilmington, NC 28411
(910) 686-9114
(910) 686-9666 fax

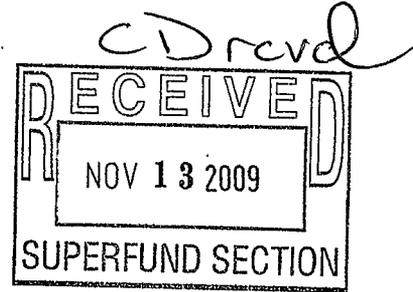
REC-LEAD

Letter of Transmittal

Date: November 12, 2009

To:

Mr. Kim T. Caulk, P.G.
NCDENR
401 Oberlin Road, Suite 150
1646 Mail Service Center
Raleigh, NC 27699-1646



Re: Wrightsville Avenue Work Plan
ECS Job # 22:13842-C — Wrightsville Avenue - Phase II Remedial Work Plan

We are enclosing:

- Attached
- Under separate cover via _____ the following items:
- Reports Prints Boring Logs Specifications
- _____

These are transmitted:

- For Approval For Your Use As Requested For Review & Comment

Remarks:

Mr. Caulk,

Attached are the electronic versions of the Phase II Remedial Investigation Work Plan for the Wrightsville Avenue Site, Site ID NCNCD0002799. The paper copy was previously mailed.

Amy C. Conchas

Amy C. Conchas, REM
Environmental Manager



ECS CAROLINAS, LLP

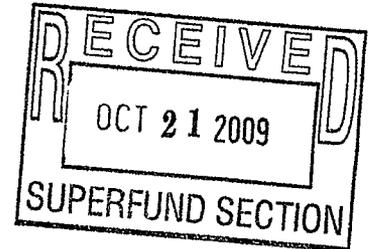
Geotechnical • Construction Materials • Environmental • Facilities

REC-LEAD
"Setting the Standard for Service!"

October 5, 2009

Mr. Kim T. Caulk
REC Program
Inactive Hazardous Sites Branch, Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Reference: Third Quarter 2009 Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project 22-13842C



Dear Mr. Caulk:

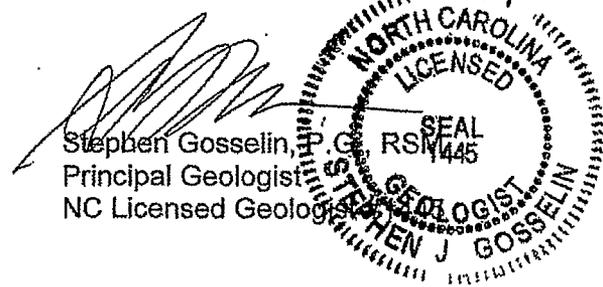
ECS Carolinas, LLP (ECS) has prepared the following Third Quarter 2009 Status Report for the above referenced site. This is the Third Quarterly Status Report for this site since execution of the REC Administrative Agreement (AA) on December 10, 2008. ECS is finalizing the Phase II Remedial Investigation Work Plan, which includes defining the horizontal and vertical extent of the polyaromatic hydrocarbon (PAH) contaminated soils. The Phase II Remedial Investigation Work Plan also includes confirming and defining, if necessary, the lead and chromium concentrations in the groundwater. The Phase II Remedial Investigation Work Plan will be submitted to the remediating party for certification in early October.

Based on the current assessment schedule, the Phase I Remedial Investigation was completed in June 2009, approximately 6 months following execution of the AA. ECS anticipates the initial sampling of Phase II of the Remedial Investigation to be completed by December 2009, which would be within 12 months of the executed AA. If additional assessment is necessary, the additional assessment should be completed within an additional six months. This time frame would place completion of the remedial investigation within 16 months of execution of the AA. Based on this time frame, the work is in progress to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C.0302(h).

If you have any questions concerning this report or this project, please contact us at (910) 686-9114 or sgosselin@ecslimited.com.

Sincerely,
ECS CAROLINAS, LLP

Amy C. Conchas, REM
Environmental Department Manager



cc: Mr. Stephen Pike – Investors Trust Company

REMIEDIATING PARTY CERTIFICATION STATEMENT (.0306(b)(2)):

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Stephen E. Pike
(Name of Remediating Party Official)

* Stephen E. Pike
(Signature of Remediating Party Official)

* 10/14/09
Date

** NOTE: The RSM certifies all documents. ~~LAST~~ Failure to do so is a violation of 15A NCAC 13C .0306(b)(2) of the REC Rules and subject to possible enforcement action against the REC and/or RSM.*

North Carolina (Enter State)

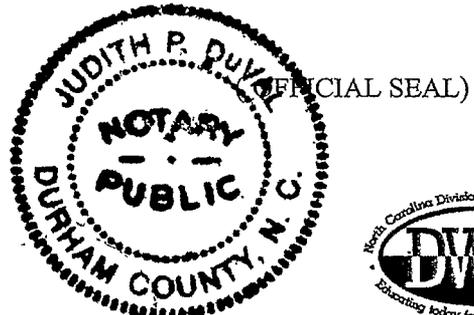
Orange COUNTY

I, Judith P. Dula, a Notary Public of said County and State, do hereby certify that Stephen E. Pike did personally appear and sign before me this day, produced proper identification in the form of N/A - personally known, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 14th day of October, 2009.

Judith P. Dula
(Notary Public (signature))

My commission expires: 10/07/2013



REGISTERED SITE MANAGER CERTIFICATION STATEMENT (.0306(b)(1)):

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Stephen J. Gosselin
(Name of Registered Site Manager)

* [Signature]
(Signature of Registered Site Manager)

* 10/15/09
Date

** NOTE: The RSM certifies all documents. LAST Failure to do so is a violation of 15A NCAC 13C .0306(b)(2) of the REC Rules and subject to possible enforcement action against the REC and/or RSM.*

North Carolina (Enter State)

Mecklenburg COUNTY

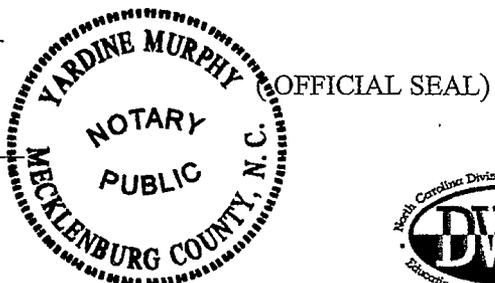
I, Yardine Murphy, a Notary Public of said County and State, do hereby certify that Stephen J. Gosselin did personally appear and sign before me this day, produced proper identification in the form of

Personally Known, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 15th day of October, 2009.

Yardine Murphy
Notary Public (signature)

My commission expires: 12/9/2011



Caulk, Kim

REC-LEAD

From: Caulk, Kim
Sent: Wednesday, August 12, 2009 1:57 PM
To: sgosselin@ecslimited.com
Cc: spike@invtrust.com
Subject: Quarterly Status Update Report for Wrightsville Ave. Site, Wilmington, NC

Mr. Gosselin:

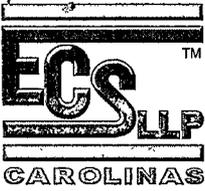
I have received a Quarterly Status Update Report for the above site that is not prepared in accordance with the executed REC-AA. The Agreement requires that the update include a statement confirming work is progressing in a manner to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C .0302(h).

Please make sure you include this statement in the future.

Regards,

Kim T. Caulk, P.G.
Inactive Hazardous Sites Branch - REC Program
NCDENR - Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, North Carolina 27605
Phone: (919) 508-8451
Fax: (919) 733-4811
e-mail: Kim.Caulk@ncdenr.gov
<http://www.wastenotnc.org/sfhome/recprog.htm>
Please note the change in e-mail address.

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.



ECS CAROLINAS, LLP

Geotechnical • Construction Materials • Environmental • Facilities

REC-LEAD
"Setting the Standard for Service"

July 9, 2009

Mr. Kim T. Caulk
REC Program
Inactive Hazardous Sites Branch, Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Reference: Second Quarter 2009 Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project 22-13842B



Dear Mr. Caulk:

ECS Carolinas, LLP (ECS) has prepared the following Second Quarter 2009 Status Report for the above referenced site.

This is the Second Quarterly Status Report for this site since execution of the REC Administrative Agreement on December 10, 2008. ECS finalized the Phase I Remedial Investigation, dated May 29, 2009, after which the appropriate certifications were obtained. The completed Phase I Remedial Investigation report was mailed to NCDENR the week ending July 3, 2009. ECS is currently preparing a costs estimate for Phase II Remedial Investigation Work Plan and Phase II Remedial Investigation.

If you have any questions concerning this report or this project, please contact us at (910) 686-9114 or sgosselin@ecslimited.com.

Sincerely,
ECS CAROLINAS, LLP

Amy C. Conchas, REM
Environmental Department Manager

Stephen Gosselin, P.G., RSM
Principal Geologist
NC Licensed Geologist #1445

cc: Mr. Stephen Pike – Investors Trust Company

REMEDIATING PARTY CERTIFICATION STATEMENT (.0306(b)(2)):

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Stephen E. Pike
(Name of Remediating Party Official)

* Step E. Pike
(Signature of Remediating Party Official)

* 7/13/09
Date

** NOTE: The RSM certifies all documents LAST. Failure to do so is a violation of 15A NCAC 13C .0306(b)(2) of the REC Rules and subject to possible enforcement action against the REC and/or RSM.*

NORTH CAROLINA (Enter State)

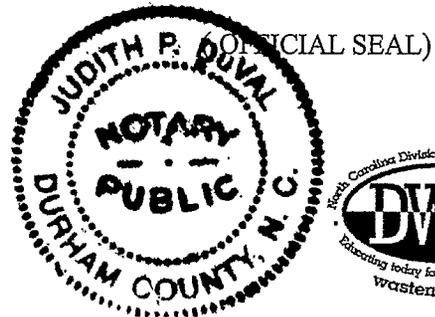
Orange COUNTY

I, Judith P. DuVal, a Notary Public of said County and State, do hereby certify that Stephen E. Pike did personally appear and sign before me this day, produced proper identification in the form of NC drivers license, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 13th day of July, 2009.

Judith P. DuVal
Notary Public (signature)

My commission expires: 10/07/2013



REGISTERED SITE MANAGER CERTIFICATION STATEMENT (.0306(b)(1)):

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

STEPHEN J. GOSSELIN

(Name of Registered Site Manager)

* [Signature]
(Signature of Registered Site Manager)

* 7/17/09
Date

** NOTE: The RSM certifies all documents. LAST. Failure to do so is a violation of 15A NCAC 13C .0306(b)(2) of the REC Rules and subject to possible enforcement action against the REC and/or RSM.*

North Carolina (Enter State)

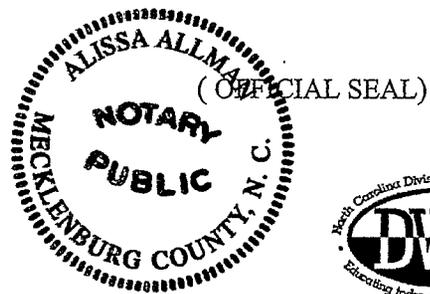
Mecklenburg COUNTY

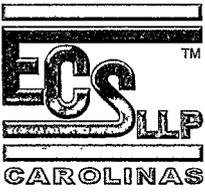
I, Alissa Allman, a Notary Public of said County and State, do hereby certify that Stephen J. Gosselin did personally appear and sign before me this day, produced proper identification in the form of NC drivers license, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 17th day of July, 2009.

Alissa Allman
Notary Public (signature)

My commission expires: 3/13/2013



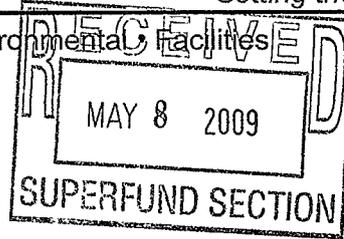


ECS CAROLINAS, LLP

Geotechnical • Construction Materials • Environmental Facilities

REC-LEAD

"Setting the Standard for Service"



April 22, 2009

Mr. Kim T. Caulk
REC Program
Inactive Hazardous Sites Branch, Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Reference: First Quarter 2009 Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project 22-13842B

Dear Mr. Caulk:

ECS Carolinas, LLP (ECS) has prepared the following First Quarter 2009 Status Report for the above referenced site.

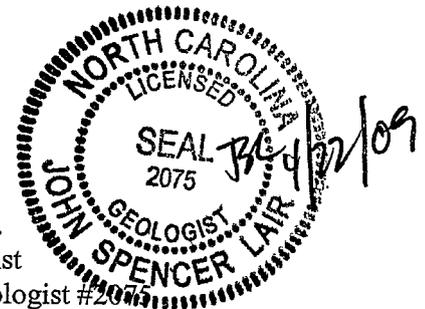
This is the first Quarterly Status Report for this site since execution of the REC Administrative Agreement on December 10, 2008. ECS prepared and submitted the Remedial Investigation Work Plan for the Phase I Remedial Investigation, dated March 6, 2009. ECS performed the field work for the Phase I Remedial Investigation on March 24, 2009 and is preparing the Phase I Remedial Investigation Report. ECS anticipates completing the Phase I Remedial Investigation Report in April or May 2009, after which ECS will prepare a Remedial Investigation Work Plan for Phase II of the Remedial Investigation.

If you have any questions concerning this report or this project, please contact us at (910) 686-9114 or sgosselin@ecslimited.com.

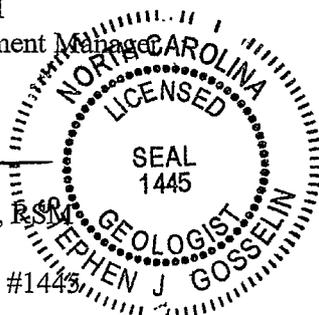
Sincerely,
ECS CAROLINAS, LLP

Amy C. Conchas, REM
Environmental Department Manager

John S. Lair, P.G.
Principal Geologist
NC Licensed Geologist #2075



Stephen Gosselin, P.G., RSM
Principal Geologist
NC Licensed Geologist #1445



cc: Mr. Stephen Pike -- Investors Trust Company

REMIEDIATING PARTY CERTIFICATION STATEMENT (.0306(b)(2)):

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Stephen E. Pike

(Name of Remediating Party Official)

* Stephen E. Pike
(Signature of Remediating Party Official)

* 4/23/09
Date

** NOTE: The RSM certifies all documents LAST. Failure to do so is a violation of 15A NCAC 13C .0306(b)(2) of the REC Rules and subject to possible enforcement action against the REC and/or RSM.*

North Carolina (Enter State)

Orange COUNTY

I, Patricia D. Unger, a Notary Public of said County and State, do hereby certify that Stephen E. Pike did personally appear and sign before me this day, produced proper identification in the form of drivers license, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 23rd day of April, 2009

Patricia D. Unger
Notary Public (signature)

My commission expires: 05-28-2012



REGISTERED SITE MANAGER CERTIFICATION STATEMENT (.0306(b)(1)):

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

STEPHEN J GOSSELIN

(Name of Registered Site Manager)

*

[Signature]
(Signature of Registered Site Manager)

*

5/7/09
Date

** NOTE: The RSM certifies all documents LAST. Failure to do so is a violation of 15A NCAC 13C .0306(b)(2) of the REC Rules and subject to possible enforcement action against the REC and/or RSM.*

North Carolina (Enter State)

Mecklenburg COUNTY

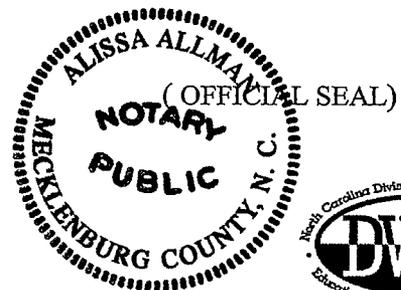
I, Alissa Allman, a Notary Public of said County and State, do hereby certify that Stephen J. Gosselin did personally appear and sign before me this day, produced proper identification in the form of driver's license, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 7th day of May, 2009.

Alissa Allman

Notary Public (signature)

My commission expires: 3/13/2013



Caulk, Kim

From: Caulk, Kim
Sent: Tuesday, May 05, 2009 5:02 PM
To: sgosselin@ecslimited.com
Subject: First Quarter 2009 Status Report, Wrightsville Ave Site, Wilmington, NC

Steve:

A quarterly status report was received today for the above site. It was not notarized and is being returned.

Regards,

Kim T. Caulk, P.G.
Inactive Hazardous Sites Branch - REC Program
NCDENR - Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, North Carolina 27605
Phone: (919) 508-8451
Fax: (919) 733-4811
e-mail: kim.caulk@ncdenr.gov
<http://www.wastenotnc.org/sfhome/recprog.htm>

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.



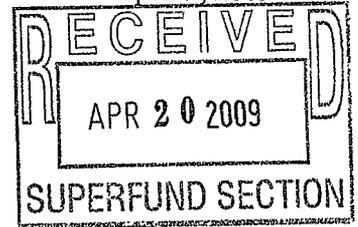
ECS CAROLINAS, LLP

Geotechnical • Construction Materials • Environmental • Facilities

REC-LEAD

April 9, 2009

Mr. Kim T. Caulk
REC Program
Inactive Hazardous Sites Branch, Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646



Reference: First Quarter 2009 Status Report
2501, 2503, 2505, 2507 and 2509 Wrightsville Avenue
Wilmington, New Hanover County, North Carolina
Site ID# NONCD0002799
ECS Project 22-13842B

Dear Mr. Caulk:

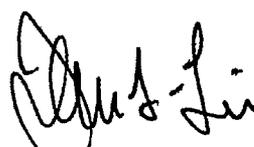
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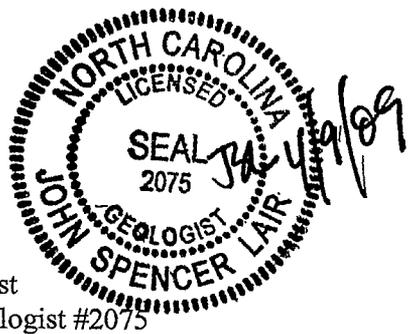
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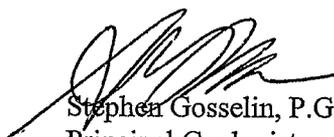
If you have any questions concerning this report or this project, please contact us at (910) 686-9114 or sgosselin@ecslimited.com.

Sincerely,
ECS CAROLINAS, LLP


Amy C. Conchas, REM
Environmental Department Manager


John S. Lair, P.G.
Principal Geologist
NC Licensed Geologist #2075




Stephen Gosselin, P.G., RSM
Principal Geologist
NC Licensed Geologist #1445



cc: Mr. Stephen Pike – Investors Trust Company

REMEDIATING PARTY CERTIFICATION STATEMENT (.0306(b)(2)):

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Stephen E. Pike
(Name of Remediating Party Official)

* Stephen E. Pike * 4/10/09
(Signature of Remediating Party Official) Date

** NOTE: The RSM certifies all documents LAST. Failure to do so is a violation of 15A NCAC 13C .0306(b)(2) of the REC Rules and subject to possible enforcement action against the REC and/or RSM.*

NC (Enter State)
Orange COUNTY

I, Josephine D. Watta, a Notary Public of said County and State, do hereby certify that Stephen E. Pike did personally appear and sign before me this the 10 day of April, 2009.

Josephine D. Watta
Notary Public (signature)

My commission expires: 4-2-2011.



REGISTERED SITE MANAGER CERTIFICATION STATEMENT (.0306(b)(1)):

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the voluntary remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

STEPHEN J. GOSSELIN

(Name of Registered Site Manager)

* [Signature]
(Signature of Registered Site Manager)

* 4/14/09
Date

* NOTE: The RSM certifies all documents LAST. Failure to do so is a violation of 15A NCAC 13C .0306(b)(2) of the REC Rules and subject to possible enforcement action against the REC and/or RSM.

North Carolina (Enter State)

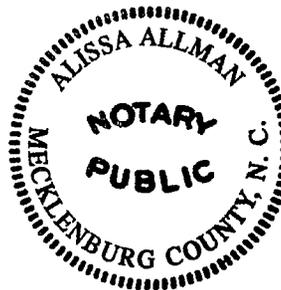
Mecklenburg COUNTY

I, Alissa Allman, a Notary Public of said County and State, do hereby certify that Stephen J. Gosselin did personally appear and sign before me this the 14th day of April, 2009.

Alissa Allman

Notary Public (signature)

My commission expires: 3/13/2013



OFFICIAL SEAL)



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

December 10, 2008

Mr. Stephen E. Pike
Investors Trust Company
121 North Columbia Street
Chapel Hill, NC 27514

REC HEAD

Re: Executed REC Administrative Agreement
Wrightsville Avenue
Wilmington, New Hanover County, NC
Site ID No. NONCD0002799

Dear Mr. Pike:

I have enclosed a copy of the executed Registered Environmental Consultant (REC) Administrative Agreement (AA) for the above referenced site. The effective date of the AA is December 10, 2008. By signing the AA, both the Remediator and the REC have acknowledged that the REC is fully accountable for complying with 15A NCAC 13C .0300 including the deadlines that are established upon execution of this AA and the standards of conduct for RECs in Section .0305(b). The first quarterly letter status report required by Section III.E of the AA is due April 15, 2009.

If you have any questions, please feel free to contact me.

Sincerely,

Kim T. Caulk
REC Program
Inactive Hazardous Sites Branch
Superfund Section

Enclosure

cc: Mr. Mark Brown, ECS Carolinas (w/ enclosure)

INACTIVE SITES RANKING SYSTEM
SUMMARY SHEET

Site Name: Wrightsville Avenue

Location: Wilmington, New Hanover County, NC

ID Number: NONCD0002799

Ranked By: Sue Robbins Date: 11-26-08

Reviewed By: Ginny Henderson Date: 12-9-08

Site Description/Comments:

A real estate investigation revealed a solvent odor and a composite soil sample indicated benzo(a)anthracene and beno(a)pyrene at a concentration above action levels.

Route Scores: GW = 55.87 SW = 27.94 A = 0 P = 25

Total Score:
$$\frac{((55.87)^2 + (27.94)^2 + (0)^2 + (25)^2)^{1/2}}{2} = \underline{\underline{33.64}}$$

I. GROUND WATER ROUTE WORK SHEET

Rating Factor	Assigned Value (Circle One)	Score
---------------	--------------------------------	-------

A. Route Characteristics

- 1. Depth to Water Table 0 2 4 6 8 10
- 2. Net Precipitation 0 1 2 3
- 3. Hydraulic Conductivity 0 1 2 3
- 4. Physical State 0 1 2 3

Total Route Characteristics Score	12
B. Containment	0 1 2 3 <u>0</u> 3

C. Waste Characteristics

- 1. Toxicity/Persistence 0 3 6 9 12 15 18
- 2. Hazardous Waste Quantity 0 1 2 3 4 5 6 7 8

Total Waste Characteristics Score	23
-----------------------------------	----

Ground Water Route of Migration Score

The Ground Water Route of Migration Score is obtained by multiplying lines A, B, and C and dividing this by 14.82 to give a score between 0 and 100.

Total Ground Water Route of Migration Score: 55.87

II. SURFACE WATER ROUTE WORK SHEET

Rating Factor	Assigned Value (Circle One)	Score
---------------	--------------------------------	-------

A. Route Characteristics

- 1. Facility Slope and Intervening Terrain 1 2 3
- 2. 1-yr., 24-hour Rainfall 0 1 2 3
- 3. Distance to Nearest Surface Water 0 2 4 6 8 10
- 4. Physical State 0 1 2 3

Total Route Characteristics Score	6
0 1 2 3 <input type="radio"/>	3

B. Containment	
-----------------------	--

C. Waste Characteristics

- 1. Toxicity/Persistence 0 3 6 9 12 15 18
- 2. Hazardous Waste Quantity 0 1 2 3 4 5 6 7 8

Total Waste Characteristics Score	23
-----------------------------------	----

Surface Water Route of Migration Score

The Surface Water Route of Migration Score is obtained by multiplying lines A, B, and C and dividing this by 14.82 to give a score between 0 and 100.

Total Surface Water Route of Migration Score: 27.94

III. AIR ROUTE WORK SHEET

Rating Factor	Assigned Value (Circle One)	Score
---------------	--------------------------------	-------

A. Waste Characteristics

- | | |
|-----------------------------------|-------------------|
| 1. Reactivity and Incompatibility | 0 1 2 3 |
| 2. Toxicity | 0 3 6 9 |
| 3. Hazardous Waste Quantity | 0 1 2 3 4 5 6 7 8 |

Total Waste Characteristics Score	0
-----------------------------------	---

B. Targets

- | | |
|--------------------------------------|-----------------------------|
| 1. Population Within a 4-Mile Radius | 0 9 12 15 18
21 24 27 30 |
| 2. Distance to Sensitive Environment | 0 2 4 6 |
| 3. Land Use | 0 1 2 3 |

Total Targets Score	0
---------------------	---

Air Route of Migration Score

The Air Route of Migration Score is obtained by multiplying lines A and B and dividing this by 7.80 to give a score between 0 and 100.

Total Air Route of Migration Score: 0

IV. DIRECT CONTACT ROUTE SCORE SHEET

Rating Factor	Assigned Value (Circle One)	Score
---------------	--------------------------------	-------

A. Residential Population

- 1. Toxicity 0 3 6 9

- 2. Targets
 - a) High Risk Population
(count x 8, max. 100) _____
 - b) Total Resident Population
(count x 2, max. 100) _____
 - c) Sensitive Environment 0 10 15 20 25

Resident Target Score
(lines 2a + 2b + 2c, max. 100) _____

Total Residential Population Score	0
------------------------------------	---

B. Nearby Population

- 1. Likelihood of Exposure
(matrix score) 0.5
 - a) Area of Contamination 0 25 75 100
 - b) Accessibility/
Frequency of Use 5 25 50 100

- 2. Toxicity
Environment 0 3 6 9

- 3. Targets (max. 100) 100

Total Nearby Population Score	450
-------------------------------	-----

Overall Population Exposure Score

The Overall Population Exposure Score is determined by adding lines A and B and dividing this by 18 to give a score between 0 and 100.

Total Population Exposure Route of Migration Score: 25

DOCUMENTATION RECORDS
FOR
STATE HAZARD RANKING SYSTEM

INSTRUCTIONS: Briefly summarize the information you used to assign a score to each factor and document the source of the information and/or the rationale for each score.

Facility Name: Wrightsville Avenue

ID Number: NONCD0002799

Location: Wilmington, New Hanover County, NC

Date Scored: 11-26-08

Person Scoring: Sue Robbins

Factors Not Scored: Residential Population and Air Route

Comments:

References:

1. State file.
2. North Carolina Atlas, University of NC Press, Chapel Hill, NC 1975.
3. Rainfall Frequency Atlas of the US, Technical Paper 40, US Department of Commerce, Washington, DC, 1963.
4. 2000 Census of Population and Housing: Summary Population and Housing Characteristics: North Carolina, US Department of Commerce. <http://quickfacts.census.gov/qfd/>.
5. Dangerous Properties of Industrial Materials, N. Irving Sax, Van Reinhold Company, Inc., 1984.
6. 40 CFR 300, Appendix A, July 1, 1988.

GROUND WATER ROUTE

A. Route Characteristics:

1. Depth to Water Table: (1)
4: Coastal Plain
2. Net Precipitation: (2)
2: 54-43 inches = 11 inches
3. Hydraulic Conductivity of Unsaturated Zone: (2)
3: coastal plain
4. Physical State: (1)
3: unknown

- ### B. Containment: (1)
- 3: unknown

C. Waste Characteristics:

1. Toxicity/Persistence: (1,5)
18: benzo(a)pyrene
2. Hazardous Waste Quantity: (1)
5: unknown

SURFACE WATER ROUTE

A. Route Characteristics:

1. Facility Slope and Intervening Terrain: (1)
0: closed basin
2. One-Year 24-hour Rainfall: (3)
3: 3.5- 4.0 inches
3. Distance to Nearest Surface Water/Name: (1)
0: closed basin
4. Physical State: (1)
3: unknown

- B. Containment: (1)
3: unknown

C. Waste Characteristics:

1. Toxicity/Persistence: (1,5)
18: benzo(a)pyrene
2. Hazardous Waste Quantity: (1)
5: unknown

AIR ROUTE

A. Waste Characteristics: **NOT SCORED**

1. Reactivity and Incompatibility:

2. Toxicity:

3. Hazardous Waste Quantity:

B. Targets: **NOT SCORED**

1. Population within 4-mile Radius/Distance from Hazardous Substance:

2. Distance to Sensitive Environment:

3. Land Use:

POPULATION EXPOSURE ROUTE

A. Residential Population: **Not Scored**

- 1. Toxicity: 0
- 2. Targets:
 - a. High Risk Population: 0
 - b. Total Resident Population: 0
 - c. Sensitive Environment

B. Nearby Population:

- 1. Likelihood of Exposure Score:
 - a. Area of Contamination: (1)
50: best estimate has site slightly over 1 acre
 - b. Accessibility/Frequency of Use: (1)
75: no barriers
- 2. Toxicity: (1,5)
9: benzo(a)pyrene
- 3. Targets: $0.1 (\underline{2229}) + 0.05 (\underline{6686} \quad \underline{\approx 100}) = 557$
 - a. 0- 1/2 mile: $3.14 (0.5^2) \times \underline{2839}^{\text{people/sq.mi}} = \underline{2229}$ (4)
 - b. 1/2 - 1 mile: $3.14 (1^2 - 0.5^2) \times \underline{2839}^{\text{people/sq.mi}} = \underline{6686}$ (4)

**NORTH CAROLINA DEPARTMENT OF ENVIRONMENT
AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
SUPERFUND SECTION**

**IN RE: WRIGHTSVILLE AVE
 NONCD 0002799
 WILMINGTON, NORTH CAROLINA
 NEW HANOVER COUNTY**

**ADMINISTRATIVE AGREEMENT
FOR REGISTERED ENVIRONMENTAL
CONSULTANT-DIRECTED ASSESSMENT
AND REMEDIAL ACTION PURSUANT TO
N.C.G.S. 130A-310.9(c) and 15A NCAC 13C.0300.**

DOCKET NUMBER 08-SF-263

I. STATEMENT OF PURPOSE

The purpose of this Administrative Agreement (Agreement) is to provide for implementation by The Patricia Myers Trust (the Remediator) of a voluntary remedial action program pursuant to N.C.G.S. 130A-310.9(c) and 15A NCAC 13C .0300 at the site defined in Section II. A. of this Agreement.

II. STIPULATIONS OF FACT

A. The "Site" is the property currently owned by The Patricia Myers Trust at 2501-2509 Wrightsville Avenue, Wilmington, New Hanover County, North Carolina and any additional area which has become contaminated as a result of hazardous substances or waste disposed or discharged at that property.

B. The Site is an inactive hazardous substance or waste disposal site within the meaning of N.C.G.S. 130A-310(3).

III. WORK TO BE PERFORMED

A. The Remediator shall conduct a voluntary remedial action at the Site in accordance with the provisions of N.C.G.S. 130A-310.9(c), 15A NCAC 13C .0300, and the "Registered Environmental Consultant Program Implementation Guidance" of the North Carolina Division of Waste Management (the Division). The voluntary remedial action shall include the remediation of any hazardous substances as defined in G.S. 130A-310(2) and any contaminants as defined in 15A NCAC 2L present at the Site.

B. Within thirty-six (36) months after the execution of this Agreement, the Remediator shall complete a remedial investigation at the Site which complies with the provisions of 15A NCAC 13C .0300 including, but not limited to, .0302(f), .0302(k)-(p), .0306(c)-(h) and .0306(q). For any requirement that has already been met, the Remediator shall specify the location within the document(s) on file with the Superfund Section that show(s) that the requirement has been met. The remedial investigation shall not be considered complete until the Remediator has submitted a remedial investigation report and completion statement, both certified in accordance with .0306(b) by the REC and the Remediator.

C. Within twenty-four (24) months of completion of the remedial investigation or within sixty (60) months after the execution of this Agreement, whichever is earlier, the Remediator shall begin operation of the remedial action system for groundwater at the Site in compliance with the provisions of 15A NCAC 13C .0300 including, but not limited to, .0302(f), .0302(k) - (p), .0306(c) - (d) and .0306(i) - (n). For any requirement that has already been met, the Remediator shall specify the location within the document(s) on file with the Superfund Section that show(s) that the requirement has been met. Operation of the remedial action system for groundwater shall be considered to have begun only upon the submission to the Division of the groundwater remedial action construction completion report, certified in accordance with .0306(b) by the REC and the Remediator, and upon commencement of the actual operation of the remedial system.

D. Within ninety-six (96) months after the execution of this Agreement, the Remediator shall complete, for wastes, soils, surface water and sediments at the Site, a remedial action which complies with the provisions of 15A NCAC 13C .0300 including, but not limited to, .0302(f), .0302(k) - (p), .0306(c) - (d), .0306(i) - (n) and .0308. For any requirement that has already been met, the Remediator shall specify the location within the document(s) on file with the Superfund Section that show(s) that the requirement has been met. The remedial action for wastes, soils, surface water and sediments shall not be considered complete until the Remediator has submitted, for these media, a remedial action completion report and work phase completion statement, both certified in accordance with .0306(b) by the REC and the Remediator.

E. The Remediator shall submit quarterly letter status reports on or before the 15th day of January, April, July and October of each year until such time as the REC has prepared and submitted certified completion statements for all contaminated media pursuant to 15A NCAC 13C .0306(b)(5)(D). Each quarterly status report must summarize, in one to two paragraphs, work performed since the last quarterly status report. These status reports must include a statement confirming work is progressing in a manner to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C .0302(h). These status reports must be certified in accordance with .0306(b) by the REC assigned to this project and the Remediator. A quarterly letter status report may be incorporated with another document such as a remedial investigation work plan, a remedial investigation report, a remedial action plan, etc. if such other document is submitted at the time when a quarterly letter status report is due. Once the REC has

prepared and submitted certified completion statements for all contaminated media pursuant to 15A NCAC 13C .0306(b)(5)(D), quarterly letter status reports under this paragraph shall be supplanted with the requirements of progress reporting of remedial action implementation pursuant to 15A NCAC 13C .0306(o).

F. If there is groundwater contamination at the Site, the Remediator shall install and monitor sentinel groundwater monitoring wells such that groundwater monitoring data obtained from the monitoring activities will accurately monitor the migration of any contamination at the Site toward any drinking water or production water well that is known to be present within a one-thousand (1000) feet of the detectible perimeter of the groundwater contamination at the Site. The Remediator shall notify the Division within twenty-four (24) hours of the time when the Remediator or the Remediator's REC discovers that a sentinel groundwater monitoring well has detectable concentrations of any contamination.

G. After completing the inventory of all identifiable wells used as sources of potable water pursuant to 15A NCAC 13C .0306(g)(6), if any new drinking water wells are installed within one-thousand five-hundred (1500) feet of the Site property boundaries, the Remediator and/or the Remediator's REC shall notify the Division within twenty-four (24) hours of the time when the Remediator and/or the Remediator's REC discovers or otherwise finds out about such wells during the normal course of work for the project.

H. If hazardous substances as defined in G.S. 130A-310(2) or other contaminants as defined in 15A NCAC 2L present at the Site have affected any drinking water wells, the Remediator shall, within a time period established by the Division, provide an alternate drinking water source for users of those wells.

I. The Remediator shall ensure that remedial action progress reports are prepared in accordance with 15A NCAC 13C .0306(o).

IV. ADDITIONAL PROVISIONS

A. All work performed pursuant to this Agreement shall be under the direction and supervision of the Division-approved REC specified in Attachment A, in accordance with 15A NCAC 13C .0302(f).

B. All work plans, reports, completion statements and project schedules prepared pursuant to this Agreement shall be certified by a representative of the Remediator in accordance with 15A NCAC 13C .0306(a) and .0306(b)(2).

C. In the event that the REC specified in Attachment A ceases to serve in that capacity at the Site or is disqualified as an REC by the Division, the Remediator's voluntary remedial action status shall be subject to revocation if the Remediator fails to propose a replacement REC within sixty (60) days, in accordance with 15A NCAC 13C .0302(n).

D. The Remediator shall pay an annual administration fee to the Division, in accordance with 15A NCAC 13C .0307(c), to help offset the costs of the Division's audits of voluntary remedial actions.

E. The Remediator is responsible for obtaining all necessary registrations, permits and approvals in accordance with 15A NCAC 13C .0306(m)(3).

F. The Remediator and its REC shall preserve, for at least six (6) years after termination of this Agreement, all records and documents in its possession or in the possession of its divisions, employees, agents, accountants, contractors or attorneys which relate in any way to this Agreement. After this six (6)-year period, the Remediator shall notify the Division at least thirty (30) days prior to the destruction of any such records and documents. The Remediator shall comply with any written request by the Division, prior to the day for which destruction is scheduled, to continue to preserve such records and documents or to provide them to the Division. The Remediator may assert any available right to confidentiality regarding particular records and documents, other than analytical data. Pursuant to 15A NCAC 13C .0302(m) the REC must maintain all such records and documents beyond the six (6) year period unless it receives Division approval for destruction.

G. In the event that the Agreement is terminated, the Remediator and/or REC shall, within thirty (30) days, submit to the Division a summary report that includes all information and data that has been collected pursuant to 15A NCAC 13C .0306(h), (n), (o), or (p). Certification of the report shall be provided in accordance with 15A NCAC 13 C .0306(b)(1) and (2).

The effective date of this Agreement shall be the date on which it is executed by Jack R. Butler.

Date Executed: December 10, 2008

By: Jack R. Butler
Jack R. Butler, P.E.
Chief, Superfund Section
Division of Waste Management
North Carolina Department of Environment
and Natural Resources

By: Stephen E. Pike
(Signature of Party Authorized to Bind Remediator)
Stephen E. Pike, President
(Typed or Printed Name of Signatory, Title)

Investors Trust Company
(Typed or Printed Name of Company)

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

Attachment A to
Administrative Agreement
for Registered Environmental
Consultant-Directed Assessment
and Remedial Action Pursuant to
N.C.G.S. 130A-310.9(c) and
15A NCAC 13C .0300.

Docket No. 08-SF-263

We hereby certify that the Remediator has retained the undersigned Division-approved Registered Environmental Consultant (REC) to implement and oversee a voluntary remedial action at the Site pursuant to N.C.G.S. 130A-310.9(c) and 15A NCAC 13C .0300, and that the undersigned Division-approved Registered Site Manager (RSM) shall serve as RSM for the voluntary remedial action.

The undersigned Remediator and REC agree to indemnify and save and hold harmless the State of North Carolina and its agencies, departments, officials, agents, employees, contractors and representatives, from any and all claims or causes of action arising from or on account of acts or omissions of the Remediator or REC or their officers, employees, receivers, trustees, agents or assigns in carrying out actions required pursuant to the Agreement which incorporates this Attachment A (this Agreement). Neither the State of North Carolina nor any agency or representative thereof shall be held to be a party to any contract involving the Remediator relating to the Site excluding, however, this Agreement.

The Remediator affirms that the REC has been provided a full and complete copy of this Agreement prior to signature. The undersigned REC representatives affirm that they have received, read, and intend to comply with the provisions of this Agreement. Both the Remediator and REC acknowledge that the REC is fully accountable for complying with 15A NCAC 13C .0300 including the deadlines established upon execution of this Agreement.

Remediator:

Stephen E. Pike 10/2/08
(Signature Party Authorized to Bind Remediator) (Date)

Stephen E. Pike, President
(Typed or Printed Name of Signatory, Title)

Investors Trust Company
(Typed or Printed Name of Company)

Registered Environmental Consultant:

Larry C Rice 10/31/08
(Signature of REC Owner, Partner, or Corporate Officer) (Date)

Larry C Rice Vice President
(Typed or Printed Name of Signatory, Title)

ECS Carolinas LLP
(Typed or Printed Name of REC Firm)

Registered Site Manager:

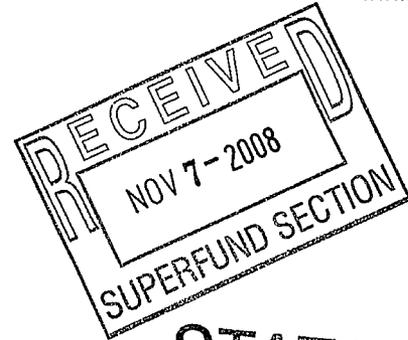
Stephen Mark Brown 10/31/08
(RSM Signature) (Date)

STEPHEN MARK BROWN
(Typed or Printed Name of RSM)



Investors Trust Company

121 North Columbia Street (27514)
P.O. Drawer 2687, Chapel Hill, NC 27515-2687
919/968-2200, 800/326-4842
Fax: 919/929-9139
www.invtrust.com



STATE FILE

November 6, 2008

Mr. Kim T. Caulk
Inactive Hazardous Sites Branch
REC Program NCDENR
401 Oberlin Road, Suite 150
Raleigh NC 27605

Re: Wrightsville Avenue Site, Wilmington, NC

Dear Kim,

Enclosed is the signed Administrative Agreement related to the above property. As you mentioned in your email to me of November 5th, 2008, you have already received the \$2,500 fee related to the REC Program.

Please contact me if you need any additional information.

Sincerely,

Stephen E. Pike
President

Enclosure



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

September 29, 2008

STATE FILE

Mr. Stephen E. Pike
Investors Trust Company
121 North Columbia Street
Chapel Hill, NC 27514

Re: Final REC Administrative Agreement
Wrightsville Avenue
Wilmington, New Hanover County, NC
Site ID No. NONCD0002799

Dear Mr. Pike:

The Inactive Hazardous Sites Branch (Branch) is forwarding a final Administrative Agreement (AA) for a Registered Environmental Consultant (REC)-directed, voluntary assessment and remedial action for the above referenced Site. The **original**, final AA must be signed by both the remediating party (RP) and REC and returned to me for execution by the Division of Waste Management (DWM). Note that the RP must sign the AA in two (2) locations. Also, a check for the REC Program administration fee must be received by the Branch before the AA can be executed. After it is executed, a copy of the AA will be returned for your records. Be aware, when the AA is signed, both the RP and REC will be acknowledging that the REC is fully accountable for complying with the REC Rules (15A NCAC 13C .0300) including the deadlines established upon execution of the AA and the standards of conduct for RECs in Section .0305(b).

If you have any questions, please contact me by phone at (919) 508-8451 or e-mail at Kim.Caulk@ncmail.net.

Sincerely,

Kim T. Caulk
REC Program
Inactive Hazardous Sites Branch
Superfund Section

Enclosure

Subject: RE: Draft REC-AA for Wrightsville Avenue, Wilmington, NC
From: "Steve Pike" <spike@invtrust.com>
Date: Mon, 8 Sep 2008 10:40:27 -0400
To: "Kim T. Caulk" <Kim.Caulk@ncmail.net>
CC: <jeff@unitedexcavation.com>

STATE FILE

Kim,

Thank you. This looks correct. After the notice period, I will look for the agreement, which we will execute and return.

Best regards,

Steve

From: Kim T. Caulk [mailto:Kim.Caulk@ncmail.net]
Sent: Tuesday, September 02, 2008 1:33 PM
To: Steve Pike
Subject: Re: Draft REC-AA for Wrightsville Avenue, Wilmington, NC

Steve:

Attached is the revised AA with the Trust listed as the remediator. Let me know whether or not it is correct. After the public notice ends, I will forward to you a final AA for signature.

Contact me if you have any questions.

Kim

Steve Pike wrote:

Kim,

Thank for your help. The legal owner is the "Patricia Myers Trust under agreement dated February 4, 2004, Investors Trust Company, Trustee".

I will be the point of contact on this until we get it resolved. My contact information follows.

Steve

Stephen E. Pike
President
Investors Trust Company
121 North Columbia Street
Chapel Hill, NC 27514

919 945-2459

From: Kim T. Caulk [mailto:Kim.Caulk@ncmail.net]
Sent: Wednesday, July 23, 2008 11:35 AM
To: Steve Pike
Cc: jeff@unitedexcavation.com; aconchas@ecslimited.com; ANNA JONES
Subject: Draft REC-AA for Wrightsville Avenue, Wilmington, NC

NOTICE OF ADMINISTRATIVE AGREEMENT

STATE FILE

**Wrightsville Avenue Site
Wilmington, New Hanover County, North Carolina**

The North Carolina Division of Waste Management (Division) is soliciting public comment on an Administrative Agreement (Agreement) that the Division intends to enter into with United Excavation Services, Inc. (the Remediator). The Remediator plans to conduct a voluntary cleanup of hazardous substances at the Wrightsville Avenue Site, 2501-2509 Wrightsville Avenue, Wilmington, New Hanover County, North Carolina. This voluntary remedial action will be conducted pursuant to N.C.G.S. 130A-310.9(b) and -310.9(c). Voluntary remedial actions implemented pursuant to N.C.G.S. 130A-310.9(c) are directed by Department-designated "Registered Environmental Consultants" in place of state oversight.

The complete file and a copy of the Agreement can be viewed at the following location:

NC Division of Waste Management
401 Oberlin Rd. - Suite 150
Raleigh, North Carolina 27605

Hours (by appointment only):
Monday - Friday 8:00 am - 5:00 pm
To schedule an appointment, contact Mr. Scott Ross
at (919) 508-8475

To receive an electronic copy of the draft Agreement or to provide comments or questions regarding the draft Agreement or the role of the Registered Environmental Consultant for this site, contact:

MR. KIM T. CAULK
REC PROGRAM
SUPERFUND SECTION
NORTH CAROLINA DIVISION OF WASTE MANAGEMENT
401 OBERLIN ROAD, SUITE 150
RALEIGH, NC 27605
(919) 508-8400

This Notice has been prepared for parties in the general area that may be interested in the cleanup activities at the Site. All comments on the draft Agreement must be received no later than September 19, 2008.

Wrightsville Avenue
Wilmington, New Hanover County, North Carolina

STATE FILE

Mailing List:

MR KIM T CAULK
NC DENR
DIVISION OF SOLID WASTE MANAGEMENT
SUPERFUND SECTION
REC PROGRAM
401 OBERLIN ROAD SUITE 150
RALEIGH NC 27605

JEFF MACELLURO
UNITED EXCAVATION SERVICES
INCORPORATED
6720 FINIAN DRIVE
WILMINGTON NC 28409

DAVID E RICE
NEW HANOVER COUNTY DEPARTMENT OF
HEALTH
2029 SOUTH 17TH STREET
WILMINGTON NC 28401

STERLING B CHEATHAM CITY MANAGER
CITY OF WILMINGTON
PO BOX 1810
102 NORTH 3RD STREET
WILMINGTON NC 28402

W I P INCORPORATED
1508 MILITARY CUTOFF ROAD SUITE 201
WILMINGTON NC 28403

PATRICIA HOBBS MYERS
5209 BLUE CLAY ROAD
WILMINGTON NC 28429

ELIZABETH CHASE
207 RIVERSIDE DRIVE
SNEADS FERRY NC 28460

DEXTER HELGA WILLIAMSON
2502 WRIGHTSVILLE AVENUE
WILMINGTON NC 28403

VIVIAN WINSTEAD ET AL
204 CASTLE BAY DRIVE
HAMPSTEAD NC 28443

CHRISTOPHER AND JULIE SABA
PO BOX 7539
WILMINGTON NC 28406

ALDEN AND SUSAN COLE
814 COLONIAL DRIVE
WILMINGTON NC 28403

Subject: Re: FW: Emailing: Adj. Parcels, Figures
From: "Kim T. Caulk" <Kim.Caulk@ncmail.net>
Date: Tue, 12 Aug 2008 13:50:14 -0400
To: Steve Pike <spike@invtrust.com>
CC: ANNA JONES <Anna.Jones@ncmail.net>

STATE FILE

Thanks. At this point, all that I need to know is whether or not you and the REC are satisfied with the wording of the AA before I can finalize it and mail an original for you to sign. At that time the REC fee can be sent to me along with the signed AA. In the meantime, we will begin the required 30-day public notice.

Kim

Steve Pike wrote:

Kim,

Attached is the information required for the 30 day public notice. As I mentioned to you, we would like to enter the REC program.

Please let me know what are the next steps and whether or not you have all you need to proceed. I realize at some point you will require payment to enter the program as outlined in your earlier memo. Please advise.

Have a good weekend.

Steve Pike
Investors Trust Company

-----Original Message-----

From: jeff [<mailto:jeff@unitedexcavation.com>] Sent: Tuesday, August 05, 2008 8:09 PM
To: Steve Pike
Subject: Emailing: Adj. Parcels, Figures

Hi Mr. Pike
This is the required info you need to complete the application.
Thanks
Jeff The message is ready to be sent with the following file or link attachments:

Adj. Parcels
Figures

From: Kim T. Caulk [<mailto:Kim.Caulk@ncmail.net>] Sent: Thursday, July 24, 2008 3:52 PM
To: Steve Pike
Cc: jeff@unitedexcavation.com; aconchas@ecslimited.com; ANNA JONES

STATE FILE

Subject: FW: Emailing: Adj. Parcels, Figures
From: "Steve Pike" <spike@invtrust.com>
Date: Fri, 8 Aug 2008 09:15:02 -0400
To: "Kim T. Caulk" <Kim.Caulk@ncmail.net>
CC: <jeff@unitedexcavation.com>, <aconchas@ecslimited.com>, "ANNA JONES" <Anna.Jones@ncmail.net>, "Ginger Clark" <gclark@invtrust.com>

Kim,

Attached is the information required for the 30 day public notice. As I mentioned to you, we would like to enter the REC program.

Please let me know what are the next steps and whether or not you have all you need to proceed. I realize at some point you will require payment to enter the program as outlined in your earlier memo. Please advise.

Have a good weekend.

Steve Pike
Investors Trust Company

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Sent: Tuesday, August 05, 2008 8:09 PM
To: Steve Pike
Subject: Emailing: Adj. Parcels, Figures

Hi Mr. Pike
This is the required info you need to complete the application.
Thanks
Jeff
The message is ready to be sent with the following file or link attachments:

Adj. Parcels
Figures

From: Kim T. Caulk [<mailto:Kim.Caulk@ncmail.net>]
Sent: Thursday, July 24, 2008 3:52 PM
To: Steve Pike
Cc: jeff@unitedexcavation.com; aconchas@ecslimited.com; ANNA JONES
Subject: Re: Draft REC-AA for Wrightsville Avenue, Wilmington, NC

Steve:



Approximate Scale 1 inch = 1,100 feet.

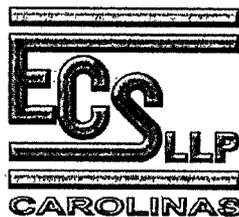
Contour Interval = 5 feet

FIGURE 1: TOPOGRAPHIC MAP

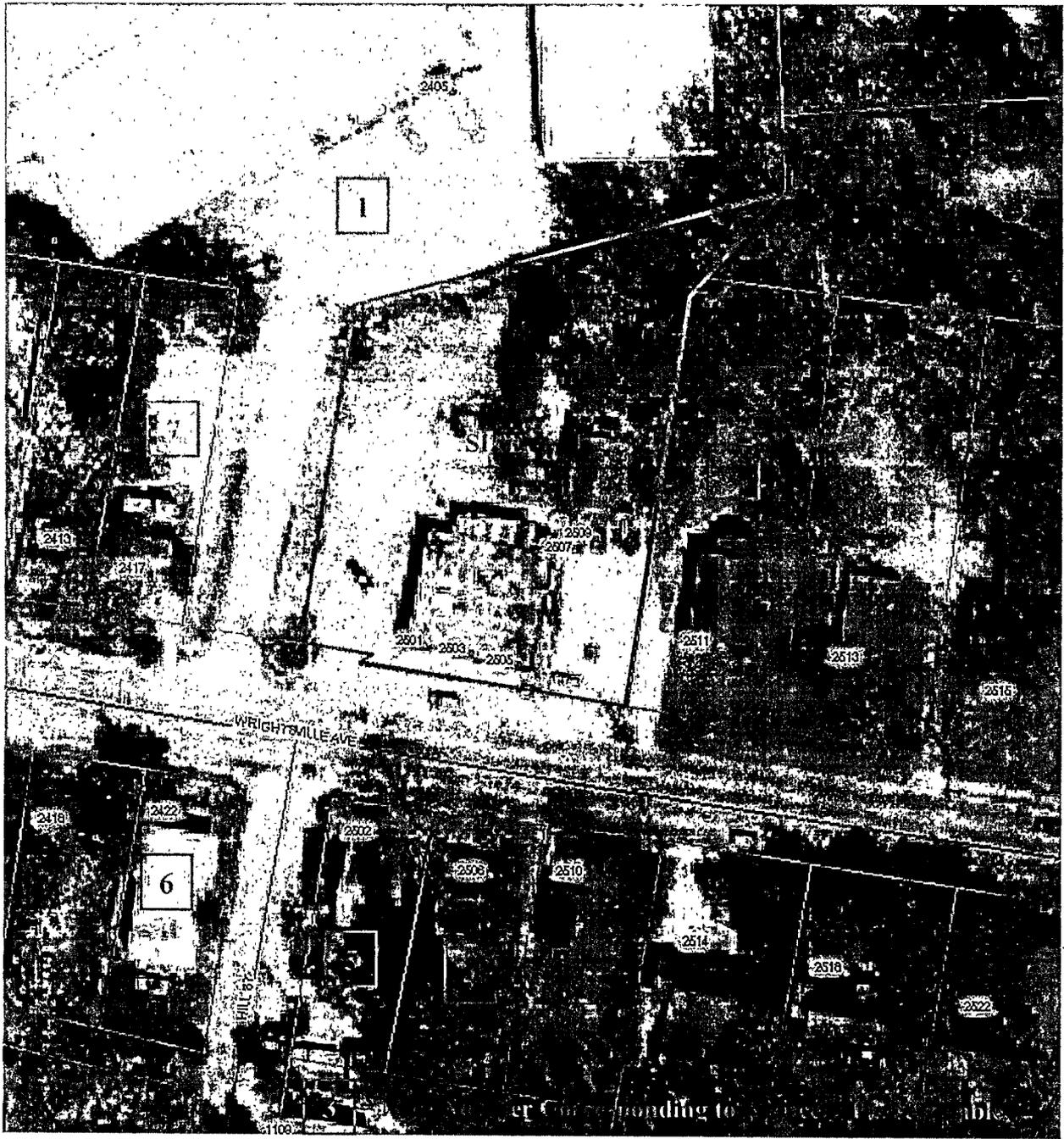
Source: USGS, Wilmington, North Carolina Quadrangle 1979.



NORR Response
Wrightsville Avenue Site
Wilmington, North Carolina
NONCD0002799



ECS Project No. 22-13842
July 2008



Not To Scale

FIGURE 2: ADJACENT PROPERTES MAP

Source: New Hanover County on-line GIS, 2006 Aerial Photograph



NORR Response
 Wrightsville Avenue Site
 Wilmington, North Carolina
 NONCD0002799



ECS Project No. 22-13842
 July 2008

**Adjacent Parcel Owners
Wrightsville Avenue Site
Wilmington, New Hanover County, North Carolina
NONCD0002799**

Map Number	Parcel Number	Property Address	Property Owner	Owners Address
1	R05412-001-027-000	2405 Wrightsville Avenue	W I P Inc.	1508 Miliatry Cutoff Road, Suite 201 Wilmington, NC 28403
2	R05412-001-015-000	2511 Wrightsville Avenue	Patricia Hobbs Myers	5209 Blue Clay Road Wilmington, NC 28429
3	R05412-008-029-000	2510 Wrightsville Avenue	Elizabeth Chase	207 Riverside Drive Sneads Ferry, NC 28460
4	R05412-008-030-000	2506 Wrightsville Avenue	Elizabeth Chase	207 Riverside Drive Sneads Ferry, NC 28460
5	R05412-008-001-000	2502 Wrightsville Avenue	Dexter Helga Williamson	2502 Wrightsville Avenue Wilmington, NC 28403
6	R05412-009-007-000	2422 Wrightsville Avenue	Vivian Winstead Etal	204 Castle Bay Drive Hampstead, NC 28443
7	R05412-001-011-000	2417 Wrghtsville Avenue	Christoper and Julie Saba	PO Box 7539 Wilmington, NC 28406

Subject: Re: Draft REC-AA for Wrightsville Avenue, Wilmington, NC
From: "Kim T. Caulk" <Kim.Caulk@ncmail.net>
Date: Thu, 24 Jul 2008 15:51:48 -0400
To: Steve Pike <spike@invtrust.com>
CC: jeff@unitedexcavation.com, aconchas@ecslimited.com, ANNA JONES <Anna.Jones@ncmail.net>

STATE FILE

Steve:

FYI, I was sending out several of these draft AAs yesterday and made a mistake with yours. The public notice mentioned in paragraph 3 below has not begun because we have not received any information for the notice from you yet. A 30-day public notice for the proposed AA must be performed by the Branch in accordance with 130A-310.9(b). To complete the required 30-day public notice, the proposed REC and/or the Remediating Party will need to submit, preferably by e-mail, a site location map (typically a tax map or parcel map) and the mailing addresses for each of the adjacent surrounding property owners. The reference/source of the submitted information should be included.

If you have any questions, please contact me.

Kim T. Caulk, P.G.
Inactive Hazardous Sites Branch - REC Program
NCDENR - Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, North Carolina 27605
Phone: (919) 508-8451
Fax: (919) 733-4811
e-mail: kim.caulk@ncmail.net

Kim T. Caulk wrote:

Subject: Draft REC-AA for Wrightsville Avenue, Wilmington, NC
From: "Kim T. Caulk" <Kim.Caulk@ncmail.net>
Date: Wed, 23 Jul 2008 11:35:16 -0400
To: Steve Pike <spike@invtrust.com>
CC: jeff@unitedexcavation.com, aconchas@ecslimited.com, ANNA JONES <Anna.Jones@ncmail.net>

STATE FILE

Attached is a **draft** Administrative Agreement (AA) for a Registered Environmental Consultant (REC)-directed assessment and remedial action for the above site (Site). The Remediating Party and REC should carefully review this document and contact me if there are any questions or comments. If you are satisfied with the terms specified in the agreement, the Inactive Hazardous Sites Branch (Branch) will prepare a final AA, assign a docket number, and mail it to you for signature.

Section III of the AA specifies the work to be performed. Be aware that for any site that enters the REC Program, the RP along with its designated RSM must make sure that all requirements for a particular phase of work specified in the REC Rules [see .0306(b)(5)] such as a remedial investigation work plan, remedial investigation report, remedial action plan, etc. have been completed and the document components required by the REC Rules have been addressed. Procedures for preparing these documents are described in the REC Program Implementation Guidance (Guidance) which can be found on our web site at <http://www.wastenotnc.org/sfhome/RECGuidance.pdf>. As indicated in Section III of the AA, for any requirement that has already been completed, the RP and REC can specify the location within the document(s) on file with the Superfund Section that indicates the requirement has already been met. Also be aware that all future work plans, report documents, and work phase completion statements that are submitted must be certified in accordance with .0306(b). If you believe unique circumstances exist regarding any of the required documents or the procedures described in the Guidance, please contact me.

By law the Department of Environment and Natural Resources must allow a 30-day public comment period for the proposed AA prior to its execution. The required public notice has begun using information that was provided to the Branch. **The notice ends August 26, 2008.**

In order to participate in the REC Program, an annual administrative fee that is used by the state to offset the costs for auditing REC sites is required. **The initial fee, which is due upon entering the REC Program, is \$2,500.00 and must be received by the Branch before the AA can be executed.** Note that there will be a similar fee each year until the remediation at the Site is complete. The annual fee is based on the number of sites in the REC Program each year and the state's projected costs for overseeing the REC Program.

If you have any questions, please contact me by phone at (919) 508-8451 or e-mail at Kim.Caulk@ncmail.net.

Kim T. Caulk, P.G.
Inactive Hazardous Sites Branch - REC Program
NCDENR - Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, North Carolina 27605
Phone: (919) 508-8451
Fax: (919) 733-4811
e-mail: kim.caulk@ncmail.net

Typo... no info. rec'd for Notice.

Wrightsville.RECAA.7.08.doc	Content-Type: application/msword
	Content-Encoding: base64

NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
SUPERFUND SECTION

STATE FILE

IN RE: **WRIGHTSVILLE AVE**
 NONCD 0002799
 WILMINGTON, NORTH CAROLINA
 NEW HANOVER COUNTY

ADMINISTRATIVE AGREEMENT
FOR REGISTERED ENVIRONMENTAL
CONSULTANT-DIRECTED ASSESSMENT
AND REMEDIAL ACTION PURSUANT TO
N.C.G.S. 130A-310.9(c) and 15A NCAC 13C.0300.

DOCKET NUMBER ____-SF-____

I. STATEMENT OF PURPOSE

The purpose of this Administrative Agreement (Agreement) is to provide for implementation by United Excavation Services, Inc.(the Remediator) of a voluntary remedial action program pursuant to N.C.G.S. 130A-310.9(c) and 15A NCAC 13C .0300 at the site defined in Section II. A. of this Agreement.

II. STIPULATIONS OF FACT

A. The "Site" is the property currently owned by The Patricia Myers Trust at 2501-2509 Wrightsville Avenue, Wilmington, New Hanover County, North Carolina and any additional area which has become contaminated as a result of hazardous substances or waste disposed or discharged at that property.

B. The Site is an inactive hazardous substance or waste disposal site within the meaning of N.C.G.S. 130A-310(3).

III. WORK TO BE PERFORMED

A. The Remediator shall conduct a voluntary remedial action at the Site in accordance with the provisions of N.C.G.S. 130A-310.9(c), 15A NCAC 13C .0300, and the "Registered Environmental Consultant Program Implementation Guidance" of the North Carolina Division of Waste Management (the Division). The voluntary remedial action shall include the remediation of any hazardous substances as defined in G.S. 130A-310(2) and any contaminants as defined in 15A NCAC 2L present at the Site.

B. Within thirty-six (36) months after the execution of this Agreement, the Remediator shall complete a remedial investigation at the Site which complies with the provisions of 15A NCAC 13C .0300 including, but not limited to, .0302(f), .0302(k)-(p), .0306(c)-(h) and .0306(q). For any requirement that has already been met, the Remediator shall specify the location within the document(s) on file with the Superfund Section that show(s) that the requirement has been met. The remedial investigation shall not be considered complete until the Remediator has submitted a remedial investigation report and completion statement, both certified in accordance with .0306(b) by the REC and the Remediator.

C. Within twenty-four (24) months of completion of the remedial investigation or within sixty (60) months after the execution of this Agreement, whichever is earlier, the Remediator shall begin operation of the remedial action system for groundwater at the Site in compliance with the provisions of 15A NCAC 13C .0300 including, but not limited to, .0302(f), .0302(k) - (p), .0306(c) - (d) and .0306(i) - (n). For any requirement that has already been met, the Remediator shall specify the location within the document(s) on file with the Superfund Section that show(s) that the requirement has been met. Operation of the remedial action system for groundwater shall be considered to have begun only upon the submission to the Division of the groundwater remedial action construction completion report, certified in accordance with .0306(b) by the REC and the Remediator, and upon commencement of the actual operation of the remedial system.

D. Within ninety-six (96) months after the execution of this Agreement, the Remediator shall complete, for wastes, soils, surface water and sediments at the Site, a remedial action which complies with the provisions of 15A NCAC 13C .0300 including, but not limited to, .0302(f), .0302(k) - (p), .0306(c) - (d), .0306(i) - (n) and .0308. For any requirement that has already been met, the Remediator shall specify the location within the document(s) on file with the Superfund Section that show(s) that the requirement has been met. The remedial action for wastes, soils, surface water and sediments shall not be considered complete until the Remediator has submitted, for these media, a remedial action completion report and work phase completion statement, both certified in accordance with .0306(b) by the REC and the Remediator.

E. The Remediator shall submit quarterly letter status reports on or before the 15th day of January, April, July and October of each year until such time as the REC has prepared and submitted certified completion statements for all contaminated media pursuant to 15A NCAC 13C .0306(b)(5)(D). Each quarterly status report must summarize, in one to two paragraphs, work performed since the last quarterly status report. These status reports must include a statement confirming work is progressing in a manner to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C .0302(h). These status reports must be certified in accordance with .0306(b) by the REC assigned to this project and the Remediator. A quarterly letter status report may be incorporated with another document such as a remedial investigation work plan, a remedial investigation report, a remedial action plan, etc. if such other document is submitted at the time when a quarterly letter status report is due. Once the REC has

prepared and submitted certified completion statements for all contaminated media pursuant to 15A NCAC 13C .0306(b)(5)(D), quarterly letter status reports under this paragraph shall be supplanted with the requirements of progress reporting of remedial action implementation pursuant to 15A NCAC 13C .0306(o).

F. If there is groundwater contamination at the Site, the Remediator shall install and monitor sentinel groundwater monitoring wells such that groundwater monitoring data obtained from the monitoring activities will accurately monitor the migration of any contamination at the Site toward any drinking water or production water well that is known to be present within a one-thousand (1000) feet of the detectible perimeter of the groundwater contamination at the Site. The Remediator shall notify the Division within twenty-four (24) hours of the time when the Remediator or the Remediator's REC discovers that a sentinel groundwater monitoring well has detectable concentrations of any contamination.

G. After completing the inventory of all identifiable wells used as sources of potable water pursuant to 15A NCAC 13C .0306(g)(6), if any new drinking water wells are installed within one-thousand five-hundred (1500) feet of the Site property boundaries, the Remediator and/or the Remediator's REC shall notify the Division within twenty-four (24) hours of the time when the Remediator and/or the Remediator's REC discovers or otherwise finds out about such wells during the normal course of work for the project.

H. If hazardous substances as defined in G.S. 130A-310(2) or other contaminants as defined in 15A NCAC 2L present at the Site have affected any drinking water wells, the Remediator shall, within a time period established by the Division, provide an alternate drinking water source for users of those wells.

I. The Remediator shall ensure that remedial action progress reports are prepared in accordance with 15A NCAC 13C .0306(o).

IV. ADDITIONAL PROVISIONS

A. All work performed pursuant to this Agreement shall be under the direction and supervision of the Division-approved REC specified in Attachment A, in accordance with 15A NCAC 13C .0302(f).

B. All work plans, reports, completion statements and project schedules prepared pursuant to this Agreement shall be certified by a representative of the Remediator in accordance with 15A NCAC 13C .0306(a) and .0306(b)(2).

C. In the event that the REC specified in Attachment A ceases to serve in that capacity at the Site or is disqualified as an REC by the Division, the Remediator's voluntary remedial action status shall be subject to revocation if the Remediator fails to propose a replacement REC within sixty (60) days, in accordance with 15A NCAC 13C .0302(n).

D. The Remediator shall pay an annual administration fee to the Division, in accordance with 15A NCAC 13C .0307(c), to help offset the costs of the Division's audits of voluntary remedial actions.

E. The Remediator is responsible for obtaining all necessary registrations, permits and approvals in accordance with 15A NCAC 13C .0306(m)(3).

F. The Remediator and its REC shall preserve, for at least six (6) years after termination of this Agreement, all records and documents in its possession or in the possession of its divisions, employees, agents, accountants, contractors or attorneys which relate in any way to this Agreement. After this six (6)-year period, the Remediator shall notify the Division at least thirty (30) days prior to the destruction of any such records and documents. The Remediator shall comply with any written request by the Division, prior to the day for which destruction is scheduled, to continue to preserve such records and documents or to provide them to the Division. The Remediator may assert any available right to confidentiality regarding particular records and documents, other than analytical data. Pursuant to 15A NCAC 13C .0302(m) the REC must maintain all such records and documents beyond the six (6) year period unless it receives Division approval for destruction.

G. In the event that the Agreement is terminated, the Remediator and/or REC shall, within thirty (30) days, submit to the Division a summary report that includes all information and data that has been collected pursuant to 15A NCAC 13C .0306(h), (n), (o), or (p). Certification of the report shall be provided in accordance with 15A NCAC 13 C .0306(b)(1) and (2).

The effective date of this Agreement shall be the date on which it is executed by Jack R. Butler.

Date Executed: _____

By: _____
Jack R. Butler, P.E.
Chief, Superfund Section
Division of Waste Management
North Carolina Department of Environment
and Natural Resources

By: _____
(Signature of Party Authorized to Bind Remediator)

(Typed or Printed Name of Signatory, Title)

(Typed or Printed Name of Company)

**North Carolina Department of Environment
and Natural Resources
Division of Waste Management
Superfund Section**

**Attachment A to
Administrative Agreement
for Registered Environmental
Consultant-Directed Assessment
and Remedial Action Pursuant to
N.C.G.S. 130A-310.9(c) and
15A NCAC 13C .0300.**

Docket No. ____-SF-____

We hereby certify that the Remediator has retained the undersigned Division-approved Registered Environmental Consultant (REC) to implement and oversee a voluntary remedial action at the Site pursuant to N.C.G.S. 130A-310.9(c) and 15A NCAC 13C .0300, and that the undersigned Division-approved Registered Site Manager (RSM) shall serve as RSM for the voluntary remedial action.

The undersigned Remediator and REC agree to indemnify and save and hold harmless the State of North Carolina and its agencies, departments, officials, agents, employees, contractors and representatives, from any and all claims or causes of action arising from or on account of acts or omissions of the Remediator or REC or their officers, employees, receivers, trustees, agents or assigns in carrying out actions required pursuant to the Agreement which incorporates this Attachment A (this Agreement). Neither the State of North Carolina nor any agency or representative thereof shall be held to be a party to any contract involving the Remediator relating to the Site excluding, however, this Agreement.

The Remediator affirms that the REC has been provided a full and complete copy of this Agreement prior to signature. The undersigned REC representatives affirm that they have received, read, and intend to comply with the provisions of this Agreement. Both the Remediator and REC acknowledge that the REC is fully accountable for complying with 15A NCAC 13C .0300 including the deadlines established upon execution of this Agreement.

Remediator:

(Signature Party Authorized to Bind Remediator) (Date)

(Typed or Printed Name of Signatory, Title)

(Typed or Printed Name of Company)

Registered Environmental Consultant:

(Signature of REC Owner, Partner, or Corporate Officer) (Date)

(Typed or Printed Name of Signatory, Title)

(Typed or Printed Name of REC Firm)

Registered Site Manager:

(RSM Signature) (Date)

(Typed or Printed Name of RSM)

Subject: RE: Draft REC-AA for Wrightsville Avenue, Wilmington, NC
From: "Steve Pike" <spike@invtrust.com>
Date: Thu, 10 Jul 2008 14:49:06 -0400
To: "Kim T. Caulk" <Kim.Caulk@ncmail.net>
CC: <jeff@unitedexcavation.com>

STATE FILE

Kim,

Thanks for your help. Jeff Macelluro will be providing you the information need in Item 4 of the procedures as noted below so that we can begin the public notice.

Below is my contact information:

Stephen E. Pike
Investors Trust Company
121 North Columbia Street
Chapel Hill, NC 27514

Phone: 919 945-2459
Fax 919 929-9139
Email: spike@invtrust.com

Please let me know if you need anything else.

Steve

-----Original Message-----

From: Kim T. Caulk [<mailto:Kim.Caulk@ncmail.net>]
Sent: Thursday, July 10, 2008 2:23 PM
To: Steve Pike
Cc: jeff@unitedexcavation.com; aconchas@ecslimited.com; ANNA JONES
Subject: Draft REC-AA for Wrightsville Avenue, Wilmington, NC

Thanks. Per our phone conversation, we will forward a Draft REC-AA as soon as possible. In order for the required public notice to begin, the information in Item 4 of the Procedures for Obtaining a Registered Environmental Consultant Administrative Agreement is needed. The public notice can be performed by the Branch while the AA is being reviewed/finalized. If you do not have the procedures, let me know.

As we discussed, please provide your mailing address.

If you have any questions, please contact me.

Regards,



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

CERTIFIED MAIL

7007 0220 0000 8225 1530

June 20, 2008

STATE FILE

Mr. Stephen E. Pike
121 North Columbia Street
Chapel Hill, NC 27514

Re: **NOTICE OF REGULATORY REQUIREMENTS FOR CONTAMINANT ASSESSMENT AND CLEANUP**
Wrightsville Avenue
Wilmington, New Hanover County, NC
NONCD0002799

Dear Mr. Pike:

Thank you for submitting the Site Cleanup Checklist/Questionnaire (Questionnaire) for the above subject site (Site). The Branch has completed its review of the Questionnaire and determined that the Site can be cleaned up through the REC ("Registered Environmental Consultant") Program without direct oversight by Branch Staff.

Note that, if you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L, Groundwater Classifications and Standards. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of contamination. Beyond initial abatement actions, all assessment and remediation will be done through the Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310.

Under the IHSRA, to receive approval of the assessment and clean up at the Site, you must enter into an administrative agreement with the Branch. Since the Branch has determined that the Site can be cleaned up through the REC Program, execution of an REC-Administrative Agreement (AA) is required. The procedures for entering into an REC-AA are attached. If you have any questions regarding these procedures or the REC Program, please contact the REC Program Manager, Kim Caulk, at (919)508-8451 or visit the REC Program website at <http://www.wastenotnc.org/SFHOME/recprog.htm>.

If we do not receive a response from you within the next 60 days indicating your willingness to enter an REC-AA, the Branch will take further action to prioritize the Site. Failure to take the initial abatement steps required in 15A NCAC 2L may result in the assessment of a civil penalty against you. In addition, the Branch may seek an injunction compelling compliance with the initial abatement steps required in 15A NCAC 2L. For future work beyond the initial abatement steps required pursuant to 15A NCAC 2L, a unilateral Order may be issued pursuant to § 130A-310.3 to compel assessment and cleanup. In addition, if you choose not to conduct a cleanup voluntarily, the site may be referred to the United States Environmental Protection Agency ("EPA"). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act ("CERCLA").

If you have additional questions about the requirements that apply to your site, please contact me at (910) 796-7411.

Sincerely,



Sue Robbins
Hydrogeologist
Inactive Hazardous Sites Branch
Superfund Section

...in REC-AA... required... may seek... future... issued... product a... Program... Liability Act

Enclosure: REC-AA Procedures

CC: Amy Conchas, ECS Carolinas, LLP, 7211 Ogden Business Park, Suite 201, Wilmington, NC 28411
IHSB Files

(910) 796-7411

- Site Name, Street Address, City, County

2501-2509 Wrightsville Avenue; Vacant Parcel of Land 2501, 2503, 2505, 2509
Wrightsville Ave, Wilmington, NC, New Hanover County

- Exact Name of Remediator

United Excavation Services, Inc.

- Names, Title telephone number and email address of the highest ranking official of the remediating party

Jeff Macelluro, President, phone (910) 793-1999, fax (910) 793-1977
Email: jeff@unitedexcavation.com

- Names, Title telephone number and email address of any other contact person(s) and the proposed REC for the remedial response action,

ECS Carolinas, LLP, 7211 Ogden Business Park, Suite 102 Wilmington, NC
28411.

Amy C. Conchas Project Scientist, phone (910) 686-9144
Email: aconchas@ecslimited.com

Mark S. Brown RSM Principal Geologist, phone (910) 861-9910
Email: smbrown@ecslimited.com

- Current owner of the site

The Patricia Myers Trust Under Agreement Dated 2/4/2004, Investors Trust
Company, Trustee



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

CERTIFIED MAIL

7007 0220 0000 8225 1530

June 20, 2008

Mr. Stephen E. Pike
121 North Columbia Street
Chapel Hill, NC 27514

Re: **NOTICE OF REGULATORY REQUIREMENTS FOR CONTAMINANT ASSESSMENT AND CLEANUP**
Wrightsville Avenue
Wilmington, New Hanover County, NC
NONCD0002799

Dear Mr. Pike:

Thank you for submitting the Site Cleanup Checklist/Questionnaire (Questionnaire) for the above subject site (Site). The Branch has completed its review of the Questionnaire and determined that the Site can be cleaned up through the REC ("Registered Environmental Consultant") Program without direct oversight by Branch Staff.

Note that, if you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L, Groundwater Classifications and Standards. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of contamination. Beyond initial abatement actions, all assessment and remediation will be done through the Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310.

Under the IHSRA, to receive approval of the assessment and clean up at the Site, you must enter into an administrative agreement with the Branch. Since the Branch has determined that the Site can be cleaned up through the REC Program, execution of an REC-Administrative Agreement (AA) is required. The procedures for entering into an REC-AA are attached. If you have any questions regarding these procedures or the REC Program, please contact the REC Program Manager, Kim Caulk, at (919)508-8451 or visit the REC Program website at <http://www.wastenotnc.org/SFHOME/recprog.htm>.

If we do not receive a response from you within the next 60 days indicating your willingness to enter an REC-AA, the Branch will take further action to prioritize the Site. Failure to take the initial abatement steps required in 15A NCAC 2L may result in the assessment of a civil penalty against you. In addition, the Branch may seek an injunction compelling compliance with the initial abatement steps required in 15A NCAC 2L. For future work beyond the initial abatement steps required pursuant to 15A NCAC 2L, a unilateral Order may be issued pursuant to § 130A-310.3 to compel assessment and cleanup. In addition, if you choose not to conduct a cleanup voluntarily, the site may be referred to the United States Environmental Protection Agency ("EPA"). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act ("CERCLA").

If you have additional questions about the requirements that apply to your site, please contact me at (910) 796-7411.

Sincerely,



Sue Robbins
Hydrogeologist
Inactive Hazardous Sites Branch
Superfund Section

Enclosure: REC-AA Procedures

CC: Amy Conchas, ECS Carolinas, LLP, 7211 Ogden Business Park, Suite 201, Wilmington, NC 28411
IHSB Files

Procedures for Obtaining a REC Administrative Agreement

To obtain a Registered Environmental Consultant (REC)-Administrative Agreement (AA), remediating parties (RPs) and RECs should use the following procedures:

1. Contact Kim Caulk, preferably by e-mail at Kim.Caulk@NCMail.net, and provide the following information for the site:
 - Site name, street address/location, city, and county;
 - Exact name of remediator;
 - Name, title, telephone number & e-mail address of the highest ranking official of the remediating party having day-to-day responsibility for the performance of the remedial response action;
 - Name, title, telephone number & e-mail address of any other contact person(s) and the proposed REC for the remedial response action;
 - Current property owner of the site.
2. Using the information above, a draft REC-AA will be prepared by the Branch and forwarded, preferably by e-mail, to the RP and any other specified representatives for review. The draft electronic version of the AA will be maintained by the Branch.
3. After the RP confirms the information is correct, the AA will be finalized by the Branch and an original, hardcopy of the final document will be mailed to the RP for signature. The RP should then mail the signed **original**, final AA to the REC for signature. The document should then be returned by mail to the Branch for execution. A photocopy of the AA will be forwarded to the RP and the REC following execution of the AA by the Branch.
4. Before the AA can be executed, the following requirements must be completed:
 - A 30-day public notice for the proposed AA must be performed by the Branch in accordance with 130A-310.9(b). To complete the required 30-day public notice, the proposed REC and/or the Remediating Party will need to submit, preferably by e-mail, a site location map (typically a tax map) and the mailing addresses for each of the adjacent surrounding property owners. The reference/source of the submitted information should be included;
 - Pursuant to 15A NCAC 13C .0307(c), to participate in the REC Program, payment of a financial assurance fee must be received by the Branch. The fee for entry of the site into the REC Program is \$2500. Checks should be made payable to NC Division of Waste Management and referenced to the REC Trust Fund. There will be a similar fee each year until remediation at the site is complete. The annual administration fee, which is to help offset the costs of the Division's audits of remedial actions, is based on the number of sites in the REC Program and in recent years has varied from approx. \$1800 to \$2500.

The required public notice can begin while the AA is reviewed/finalized and the fees are processed.

Questions regarding these procedures and the REC Program should be directed to Kim Caulk at (919)508-8451 or Kim.Caulk@NCMail.net.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Stephen E. Pike
121 North Columbia Street
Chapel Hill, NC 27514

2. Article Number
(Transfer from service label)

7007 0220 0000 8225 1530

COMPLETE THIS SECTION ON DELIVERY

A. Signature

x *Pat Unger* Agent Addressee

B. Received by (Printed Name)

PAT UNGER

C. Date of Delivery

6/23/08

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
- Registered Return Receipt for Merchandise
- Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

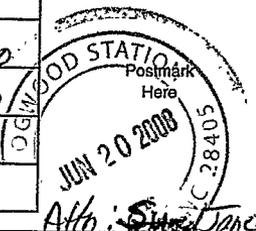
7007 0220 0000 8225 1530

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

OFFICIAL USE

Postage	\$ 42
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.32



Sent To: Mr. Stephen E. Pike
 Street, Apt. No., or PO Box No.: 121 North Columbia Street
 City, State, ZIP+4: Chapel Hill, NC 27514



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

June 9, 2008

Mr. Steve Pike
Investors Trust Company
121 N. Columbia St.
Chapel Hill, NC 27514

Re: **NOTICE OF REGULATORY REQUIREMENTS FOR CONTAMINANT ASSESSMENT AND CLEANUP**

Hobbs Property
2501-2509 Wrightsville Ave.
Wilmington, New Hanover County, NC

Dear Mr. Pike:

We received a Phase I Environmental Site Assessment, prepared for United Excavation Services, Inc., which reports that your site has been contaminated by one or more hazardous substances. Depending on the contaminants involved and whether the contaminants have impacted or may impact groundwater quality, you will be required to assess and cleanup the contamination under one or more cleanup authorities. Regulatory oversight for the assessment and cleanup under all applicable authorities will be provided by the Division of Waste Management through its Superfund Section, Inactive Hazardous Sites Branch ("Branch").

Based on information provided to date, the Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310, et seq., applies to your site. In addition, initial immediate actions may be required under 15A NCAC 2L, Groundwater Classifications and Standards.

I. ACTIONS REQUIRED AT THIS TIME:

Complete the Site Cleanup Questionnaire.

To comply with the requirements of State law, a Site Cleanup Questionnaire, available on the website noted at the end of this letter, must be completed and returned to this office. The information you provide will be reviewed along with other information to prioritize the site, so please make certain that the information you provide is complete and accurate. Please note that your failure to inform the Branch of any nearby potable wells or other high risk conditions may adversely affect the Branch's ability to identify this site as a higher-risk site.

Take Initial Abatement Actions Required Under 15A NCAC 2L.

If you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of contamination. Beyond initial abatement actions, all assessment and remediation will be done through the IHSRA.

II. FUTURE ASSESSMENT AND CLEANUP ACTIVITIES:

All correspondence regarding this site should be sent to the Branch. Future assessment and cleanup activities (activities conducted after the initial abatement steps required in 15A NCAC 2L) may be conducted through the Voluntary Cleanup Program (discussed below) or pursuant to an Order issued under N.C. Gen. Stat. § 130A-310.3. In addition, if you choose not to conduct a cleanup through the Voluntary Cleanup Program, the site may be referred to the United States Environmental Protection Agency ("EPA"). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act ("CERCLA").

III. VOLUNTARY CLEANUP PROGRAM:

Under the IHSRA, persons who move forward to assess and remediate contamination, without being compelled to do so through formal legal action filed against them, are called "volunteers." To participate in the voluntary cleanup program, you will be required to enter into an administrative agreement with the Branch. The voluntary cleanup will proceed through the Registered Environmental Consultant Program or under direct oversight by the Branch Staff, as discussed below:

Agreement to Conduct Assessment and Remediation Through the Registered Environmental Consultant Program.

The Branch has a privatized oversight arm of the voluntary cleanup program known as the Registered Environmental Consultant ("REC") program. Based on the responses provided on the questionnaire (degree of hazard and public interest in the site), the Branch will determine whether a staff person or an REC will perform the oversight and approval of your assessment and cleanup action. Please note that having one or more of the conditions identified on the questionnaire does not necessarily preclude the site for qualifying for an REC-directed cleanup action.

Under the REC program, the volunteer hires an environmental consulting firm, which the State has approved as having met certain qualifications, to implement a cleanup and certify that the work is being performed in compliance with regulations. In other words, the REC's certifications of compliance are in place of direct oversight by the Branch. Details of the REC program can be found at <http://www.wastenotnc.org/sfhome/recprog.htm>. If you have any questions specific to the REC Program, including how to participate, please contact the REC Program Manager, Kim Caulk, at (919) 508-8451.

PARID: R05412-001-014-000
MYERS PATRICIA H IRREVOCABLE
TRUST

2503 WRIGHTSVILLE AVE

Parcel

Alt ID	312712.85.3307.000
Address	2503 WRIGHTSVILLE AVE
Unit	
City	WILMINGTON
Zip Code	-
Neighborhood	6170
Class	COM-Commercial
Land Use Code	957-Vacant Floors
Living Units	
Acres	.7362
Zoning	CS-COMMERCIAL SERVICE

Legal

Legal Description	(0.74AC)LT 154 BLK B FOREST HILLS & TR B SPOFFORD LT 1,2
Tax District	WM

Owners

Owner	MYERS PATRICIA H IRREVOCABLE TRUST
City	CHAPEL HILL
State	NC
Country	
Zip	27514

The data is from 2008

PARID: R05412-001-014-000
MYERS PATRICIA H IRREVOCABLE TRUST

2503 WRIGHTSVILLE AVE

Sales

Sale Date	Sale Price	Grantee	Grantor	Book	Page	Sale Key
21-MAY-07		INVESTORS TRUST COMPANY TRUSTEE	WACHOVIA BANK NA TRUSTEE	5185	214	420274
21-MAR-07		MYERS PATRICIA H IRREVOCABLE TRUST	WACHOVIA BANK NTL ASSN EXECUTOR	5157	1596	417747
02-FEB-07	\$0	MYERS PATRICIA H IRREVOCABLE TRUST	WACHOVIA BANK NTL ASSN EXECUTOR	5137	977	415945
20-AUG-05	\$0	WACHOVIA BANK NTL ASSN EXECUTOR	MYERS PATRICIA HOBBS	9905	E873	415944
20-AUG-05	\$0	MYERS PATRICIA FAYE HOBBS HRS	MYERS PATRICIA FAYE HOBBS	9908	2005	392182
02-DEC-99	\$0	MYERS PATRICIA FAYE HOBBS	HOBBS JAMES H JR ETAL EXEC	2674	0877	162917
30-NOV-99	\$0	HOBBS STEPHEN LAWRENCE	HOBBS LAWRENCE/NICOLE MARIE J	2673	0539	162916
09-JUL-96	\$0	HOBBS MILDRED HRS	HOBBS MILDRED	9996	E548	162919
09-JUL-96	\$0	HOBBS MILDRED B HRS	HOBBS MILDRED B	9907	0996	162918
01-AUG-68	\$0	HOBBS MILDRED B	* NOT IN SYSTEM *	0839	0676	162915

Sale Details

1 of 10

Sale Date	21-MAY-07
Sale Key	420274
Sale Price	
Grantee	INVESTORS TRUST COMPANY TRUSTEE
Grantor	WACHOVIA BANK NA TRUSTEE
Sale Source	-
Book	5185
Page	214
Sale Validity	Q-Qualified
Sale Type	IMPROVED
Sale Flag	
STEB	
Instrument #	
Instrument Type	Deed
Adj. Reason	
Adj. Price	
Adj. Amount	



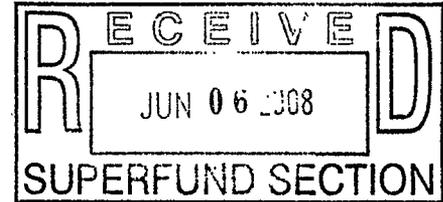


Investors Trust Company

121 North Columbia Street (27514)
P.O. Drawer 2687, Chapel Hill, NC 27515-2687
919/968-2200, 800/326-4842
Fax: 919/929-9139
www.invtrust.com

June 5, 2008

Ms. Sue Robbins
Inactive Hazardous Sites Branch
127 Cardinal Drive Extension
Wilmington, NC 28403



Dear Ms. Robbins,

Enclosed is the Notification of an Inactive Hazardous Substance or Waste Disposal Site and the Site Cleanup Questionnaire. Investors Trust Company has been assisted by ECS Carolinas, LLP with the preparation and review of this information.

Please contact me if I may provide you with any additional information.

Sincerely,

Steve Pike



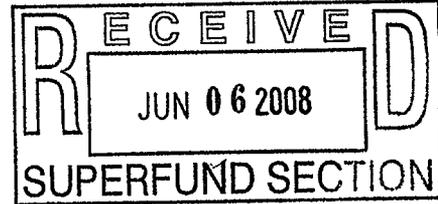
North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

May 8, 2008



Mr. Stephen E. Pike
PO Drawer 2687
Chapel Hill, NC 27515-2687

Re: **NOTICE OF REGULATORY REQUIREMENTS FOR CONTAMINANT ASSESSMENT
AND CLEANUP**

2501-2509 Wrightsville Avenue
Wilmington, New Hanover County, NC

Dear Mr. Pike:

We received your April 16, 2008 facsimile, which reports that your site has been contaminated by one or more hazardous substances. Depending on the contaminants involved and whether the contaminants have impacted or may impact groundwater quality, you will be required to assess and cleanup the contamination under one or more cleanup authorities. Regulatory oversight for the assessment and cleanup under all applicable authorities will be provided by the Division of Waste Management through its Superfund Section, Inactive Hazardous Sites Branch ("Branch").

Based on information provided to date, the Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310, *et seq.*, applies to your site. In addition, initial immediate actions may be required under 15A NCAC 2L, Groundwater Classifications and Standards.

I. ACTIONS REQUIRED AT THIS TIME:

Complete the Notification of an Inactive Hazardous Substance or Waste Disposal Site

Pursuant to N.C. Gen. Stat. § 130A-310A.1(b), within 90 days of the date on which an owner, operator, or responsible party knows or should know of the existence of an inactive hazardous substance or waste disposal site, the owner, operator, or responsible party must submit to the Division all site data that is known or readily available to the owner, operator, or responsible party. Any person who has information concerning a possible inactive hazardous substance or waste disposal site is also encouraged to fill out the notification form. The notification form is located at our website at http://www.wastenotnc.org/sfhome/Notification_Form.PDF.

Complete the Site Cleanup Questionnaire.

To comply with the requirements of State law, a Site Cleanup Questionnaire, available on the website noted at the end of this letter, must be completed and returned to this office. The information you provide will be reviewed along with other information to prioritize the site, so please make certain that the information you provide is complete and accurate. Please note that your failure to inform the Branch of any nearby potable wells or other high risk conditions may adversely affect the Branch's ability to identify this site as a higher-risk site.

Take Initial Abatement Actions Required Under 15A NCAC 2L.

If you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of contamination. Beyond initial abatement actions, all assessment and remediation will be done through the IHSRA.

II. FUTURE ASSESSMENT AND CLEANUP ACTIVITIES:

All correspondence regarding this site should be sent to the Branch. Future assessment and cleanup activities (activities conducted after the initial abatement steps required in 15A NCAC 2L) may be conducted through the Voluntary Cleanup Program (discussed below) or pursuant to an Order issued under N.C. Gen. Stat. § 130A-310.3. In addition, if you choose not to conduct a cleanup through the Voluntary Cleanup Program, the site may be referred to the United States Environmental Protection Agency ("EPA"). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act ("CERCLA").

III. VOLUNTARY CLEANUP PROGRAM:

Under the IHSRA, persons who move forward to assess and remediate contamination, without being compelled to do so through formal legal action filed against them, are called "volunteers." To participate in the voluntary cleanup program, you will be required to enter into an administrative agreement with the Branch. The voluntary cleanup will proceed through the Registered Environmental Consultant Program or under direct oversight by the Branch Staff, as discussed below:

Agreement to Conduct Assessment and Remediation Through the Registered Environmental Consultant Program.

The Branch has a privatized oversight arm of the voluntary cleanup program known as the Registered Environmental Consultant ("REC") program. Based on the responses provided on the questionnaire (degree of hazard and public interest in the site), the Branch will determine whether a staff person or an REC will perform the oversight and approval of your assessment and cleanup action. Please note that having one or more of the conditions identified on the questionnaire does not necessarily preclude the site for qualifying for an REC-directed cleanup action.

Under the REC program, the volunteer hires an environmental consulting firm, which the State has approved as having met certain qualifications, to implement a cleanup and certify that the work is being performed in compliance with regulations. In other words, the REC's certifications of compliance are in place of direct oversight by the Branch. Details of the REC program can be found at <http://www.wastenotnc.org/sfhome/recprog.htm>. If you have any questions specific to the REC Program, including how to participate, please contact the REC Program Manager, Kim Caulk, at (919) 508-8451.

Agreement to Conduct Assessment and Remediation Under State Oversight.

If the Branch determines that the site should be assessed and remediated pursuant to direct State oversight, it will not be eligible for a REC-directed cleanup. Rather, the remedial action will receive direct oversight by Branch staff.

IV. FAILURE TO RESPOND:

If we do not receive a completed notification and questionnaire, the Branch will take further action to prioritize the site without your input. Failure to take the initial abatement steps required in 15A NCAC 2L may result in the assessment of a civil penalty against you. In addition, the Branch may seek an injunction compelling compliance with the initial abatement steps required in 15A NCAC 2L. For future work beyond the initial abatement steps required pursuant to 15A NCAC 2L, a unilateral Order may be issued pursuant to § 130A-310.3 to compel assessment and cleanup.

V. ADDITIONAL INFORMATION REGARDING THE IHSRA AND THE BRANCH:

People are often confused by the name of the Inactive Hazardous Sites Response Act and the Branch. By definition, "Inactive Hazardous Sites" are any areas where hazardous substances have come to be located and would include active and inactive facilities and a variety of property types. The term "inactive" simply refers to the fact that cleanup was inactive at large numbers of sites at the time of program enactment. Additional information about the Branch may be found at <http://www.wastenotnc.org/sfhome/ihsbrnch.htm>.

Submit completed questionnaire to: Sue Robbins
Inactive Hazardous Sites Branch
127 Cardinal Drive Extension
Wilmington, NC 28403

If you have additional questions about the requirements that apply to your site, please contact me at (910) 796-7411.

Sincerely,



Sue Robbins
Hydrogeologist
Inactive Hazardous Sites Branch
Superfund Section
Division of Waste Management
cc: IHSB Files

North Carolina Department of Environment and Natural Resources
Division of Waste Management
Superfund Section
Inactive Hazardous Sites Branch



NOTIFICATION OF AN INACTIVE HAZARDOUS SUBSTANCE OR WASTE DISPOSAL SITE

Please read instructions before completing and type or print in black ink.

I. SITE NAME AND LOCATION:

Site Name (one site per form) None
Location (street address) 2501-2509 Wrightsville Avenue
City Wilmington US EPA ID# (if known) _____
County New Hanover
Directions to Site 1.40 East, merge onto US 117 S / NC-152 S / North College Rd for 3.3 miles. Turn right onto Randall Parkway for 1.7 miles. Turn left onto Independence Boulevard. 0.3 miles. Turn right onto Wrightsville Avenue for 0.5 miles. Site on right.

Attach a USGS topographic map or map of equal or reasonably similar scale (1 inch = 2000 ft.) showing the location and vicinity of the site or facility. Label map with the site name.

II. PERSON COMPLETING FORM:

Name Stephen E. Pike
Mailing Address C/O Investors Trust Company
121 N. Columbia Street
City Chapel Hill State NC Zip Code 27514
Telephone 919 945 2459

Present Owner _____
Past Owner _____
Present Operator _____
Past Operator _____
Other
(specify) Trust Officer
representing Investors Trust
as Trustee of a trust which
owns subject property.

III. PRESENT OWNER:

Individual Owner or Company Name The Patricia Myers Trust Corporation
4/10/2004, Investors Trust Company, Trustee
Executive Officer Stephen E. Pike
Mailing Address 121 North Columbia Street
City Chapel Hill State NC Zip Code 27514
Telephone 919 945 2459

Partnership _____
Individual _____
Government Unit _____
Other
(specify) Trust

IV. CURRENT SITE USE:

Check the item or items which describe the current use of the site.

Residential	<input type="checkbox"/>	Forest Land	<input type="checkbox"/>	Retirement Home	<input type="checkbox"/>
Business	<input type="checkbox"/>	Farm Land	<input type="checkbox"/>	Other	<input checked="" type="checkbox"/>
Industrial	<input type="checkbox"/>	School/Day Care	<input type="checkbox"/>	(specify)	<u>vacant lot</u>
Pasture Land	<input type="checkbox"/>	Hospital	<input type="checkbox"/>		

V. ON-SITE RESIDENTS:

Are there any on-site residents? Yes No
 Number of children (* 6 years old) living on site 0 Number of adults 0

VI. SURROUNDING PROPERTY USE:

Check the appropriate description of the area surrounding the site. (More than one may apply.)

Residential	<input checked="" type="checkbox"/>	Forest Land	<input type="checkbox"/>	Retirement Home	<input type="checkbox"/>
Business	<input checked="" type="checkbox"/>	Farm Land	<input type="checkbox"/>	Other	<input type="checkbox"/>
Industrial	<input type="checkbox"/>	School/Day Care	<input type="checkbox"/>	(Specify)	
Pasture Land	<input type="checkbox"/>	Hospital	<input type="checkbox"/>		

VII. Site Operations (More than one may apply.):

	Current	Previous
1. Mining	<input type="checkbox"/>	<input type="checkbox"/>
2. Paper and wood production	<input type="checkbox"/>	<input type="checkbox"/>
3. Textiles	<input type="checkbox"/>	<input type="checkbox"/>
4. Fertilizer	<input type="checkbox"/>	<input type="checkbox"/>
5. Printing/painting	<input type="checkbox"/>	<input type="checkbox"/>
6. Leather tanning	<input type="checkbox"/>	<input type="checkbox"/>
7. Iron/steel foundry	<input type="checkbox"/>	<input type="checkbox"/>
8. Chemical, general	<input type="checkbox"/>	<input type="checkbox"/>
9. Plating/polishing	<input type="checkbox"/>	<input type="checkbox"/>
10. Military/ammunition	<input type="checkbox"/>	<input type="checkbox"/>
11. Firing range	<input type="checkbox"/>	<input type="checkbox"/>
12. Rubber/plastics	<input type="checkbox"/>	<input type="checkbox"/>
13. Utility companies/transformers	<input type="checkbox"/>	<input type="checkbox"/>
14. Sanitary/refuse	<input type="checkbox"/>	<input type="checkbox"/>
15. Photo finishing	<input type="checkbox"/>	<input type="checkbox"/>
16. Lab/hospital	<input type="checkbox"/>	<input type="checkbox"/>
17. Wood treating	<input type="checkbox"/>	<input type="checkbox"/>
18. Battery reclamation	<input type="checkbox"/>	<input type="checkbox"/>
19. Pesticides formulation, packaging and/or distribution	<input type="checkbox"/>	<input type="checkbox"/>
20. Herbicide formulation, packaging and/or distribution	<input type="checkbox"/>	<input type="checkbox"/>
21. Other agrichemical formulation, packaging and/or distribution	<input type="checkbox"/>	<input type="checkbox"/>
22. Dry cleaning	<input type="checkbox"/>	<input type="checkbox"/>
23. Petrochemical processing or refining	<input type="checkbox"/>	<input type="checkbox"/>
24. Furniture manufacturing or finishing	<input type="checkbox"/>	<input type="checkbox"/>
25. Drum reconditioning	<input type="checkbox"/>	<input type="checkbox"/>
26. Unknown	<input type="checkbox"/>	<input type="checkbox"/>
27. Other (specify) <u>laundry, diner, grocery store</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

VIII. ENVIRONMENTAL PERMITS:

List all previous and current environmental permits below.

Type of Permit (e.g. landfill, nondischarges, etc.)	Past (circle one)	Present	Permit Number	Date Issued	Issuing Agency
None Known	Past	Present			
	Past	Present			
	Past	Present			
	Past	Present			
	Past	Present			
	Past	Present			
	Past	Present			

IX. KNOWN OR SUSPECTED RELEASES OF HAZARDOUS SUBSTANCES OR WASTE TO THE ENVIRONMENT:

List all on-site spills, disposals and other releases of hazardous substances or materials containing hazardous substances.

Material/ Chemical Released (Known and suspected)	Physical State of Material (Use codes below)	Approx. Volume Released	Date of Release	Suspected Contaminants (Use codes below)	Source of Release (e.g. tank, buried drums, landfill, product spill, etc.)	Known or Suspected Contamination			
						Ground water	Surface Water	Sediment	Soil
unknown	unknown	unknown	unknown	Pe, W	unknown				X

Physical State Codes

- G - Containerized Gas
- L - Liquid
- S - Solid/Powder
- Sl - Sludge

- A - Acids
- As - Asbestos
- Am - Ammonia
- B - Bases
- C - Cyanide

Codes for Suspected Contaminants

- D - Dioxins
- M - Metals
- Mu - Mixed Municipal Waste
- O - Organic Chemicals

- P - PCBs
- Pe - Petroleum Products
- Ps - Pesticides
- W - Waste Oil

X. TOTAL AREA OF ALL DISPOSALS, SPILLS, OR RELEASES OF HAZARDOUS SUBSTANCES OR WASTE:

- less than 1 acre
- 1 acre or more, but less than 5 acres
- 5 acres or more, but less than 10 acres
- 10 acres or more
- Unknown

XI. AVAILABILITY OF ENVIRONMENTAL ANALYTICAL DATA:

Do any environmental reports or laboratory analytical data exist for the site? Yes No
 If yes, attach reports or data to this form.

XII. IDENTIFY WHETHER ANY OF THE FOLLOWING ARE PRESENT OR WERE PRESENT IN THE PAST AT THE SITE (*More than one may apply.*):

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Debris pile(s) | <input type="checkbox"/> Tank(s) above ground | <input type="checkbox"/> Spill(s) |
| <input type="checkbox"/> Land treatment of sludges | <input checked="" type="checkbox"/> Septic tank(s) | <input type="checkbox"/> Wastewater lagoon(s) |
| <input type="checkbox"/> Landfill(s) or buried waste | <input type="checkbox"/> Surface impoundment(s) | <input type="checkbox"/> Drum(s) |
| <input type="checkbox"/> Tank(s) underground | <input type="checkbox"/> Underground injection of waste | |
| <input checked="" type="checkbox"/> Other (<i>specify</i>) <u>Burned Debris</u> | | |

XIII. ACCESSIBILITY OF SITE (*More than one may apply.*):

- 24-hour security guard
- Security guard < 24-hour/day
- Physical barrier (steep bank, creek, walls, etc.)
Describe physical barriers _____

- Site completely surrounded by fence
- Site partially surrounded by fence
- Locked gate
- Unlocked gate
- No control of access to site
- Other (*specify*) _____

XIV. WATER SUPPLY SOURCES:

Identify whether the following are present on site or on adjacent property.

	Present on site		Present on Adjacent Property	
	Yes	No	Yes	No
Spring	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> UNKNOWN
Well	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> UNKNOWN
Surface Water Intake	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> UNKNOWN

XV. SITE SURFACE WATER:

Indicate whether any surface water bodies (e.g. streams and lakes) exist on the site or the property adjacent to the site.

No

XVI. CERTIFICATION AND SIGNATURE:

I certify that to the best of my knowledge and belief, the information supplied on this form is complete and accurate.

Signature Stephen E. Pike Date 4/5/08

Name and Title (Type or print) Stephen E. Pike, President

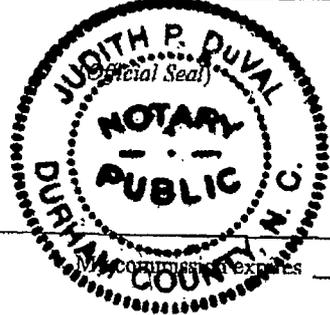
Mailing Address 121 North Columbia Street
Chapel Hill NC 27514

North Carolina STATE

Orange COUNTY

I, Judith P. DuVal, a Notary Public for said County and State, do hereby certify that Stephen E. Pike personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 5th day of June, 2008



Judith P. DuVal
Notary Public

10/07/2008

Site Cleanup Questionnaire

Remediating parties interested in volunteering should prepare this form with the assistance of an environmental consultant. All cooperative parties are eligible for Branch-approved remedial actions. Answer all questions, based on current information, and provide written descriptions where needed.

NCDENR Site Name, City and County 251-2509 Wrightsville Avenue, Wilmington, New Hanover County

1. Is the site located on or immediately adjacent to residential property, schools, day-care centers or other sensitive populations? Y N
If yes, please explain on a separate page.
2. What is the distance (from site property line) to the nearest residence, school or day-care center? Please attach a map showing the site and nearest residence, school or daycare center. Adjacent _____
3. Is the site completely surrounded by a locked fence? Y N
If no, please explain security measures at the site on a separate page.
4. Are site surface soils known to be contaminated? unknown Y N ✓
If yes, or unknown, describe briefly on a separate page.
5. Is site groundwater known to be contaminated? unknown Y N
If yes, or unknown, describe briefly on a separate page.
6. Is site sediment or surface water known to be contaminated? unknown Y N
If yes, or unknown, describe briefly on a separate page.
7. Has groundwater contamination affected any drinking water wells? unknown Y N
If yes, or unknown, please explain on a separate page.
8. What is the distance to the nearest downgradient drinking water well? > 1,500 feet
9. What is the distance to the nearest downstream surface water intake? > 1,500 feet
10. Are hazardous vapors, air emissions or contaminated dust migrating into occupied residential, commercial or industrial areas? unknown Y N
If yes, or unknown, please explain on a separate page.
11. Have hazardous substances known to have migrated off property at concentrations in excess of Branch unrestricted-use remediation goals? unknown Y N
If yes, or unknown, please explain on a separate page.
12. Has the local community expressed concerns about contamination at the site? Y N
If yes, or unknown, please explain on a separate page.
13. Based on current information, are there any sensitive environments located on the property (sensitive environments are identified in the Remedial Investigation Work Plans section of the IHSB " Guidelines for Assessment and Cleanup "at www.wastenotnc.org/sfhome/stateleadguidance.pdf)? Y N
If yes, or unknown, please explain on a separate page.

14. Based on current information, has contamination from the site migrated into any sensitive environments? unknown Y N

If yes, or unknown, please explain on a separate page.

15. Do site contaminants include radioactive or mixed radioactive and chemical wastes? unknown Y N

If yes, or unknown, please explain on a separate page.

Remediating Party Certification Statement

I hereby certify that the responses provided above are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information.

Stephen E. Pike
(Signature of Remediating Party Representative)

6/5/08
(Date)

Stephen E. Pike
(Printed Name and Title of Remediating Party Representative)

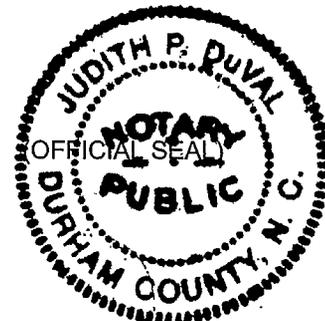
Investors Trust Company
(Printed Name of Company)

North Carolina
(State in which signature is witnessed)

Orange County

I, Judith P. DuVal, a Notary Public of said County and State, do hereby certify that Stephen E. Pike did personally appear and sign before me this the 5th day of June, 2008.

Judith P. DuVal
Notary Public (signature)



My commission expires: 10/07/2008

Environmental Consultant Certification Statement

I hereby certify that the responses provided above are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information.

Amy Conchas
(Signature)

June 2, 2008
(Date)

Amy Conchas
(Printed Name)

ECS Carolinas, LLP
(Printed Name of Environmental Consultant)

North Carolina
(State in which signature is witnessed)

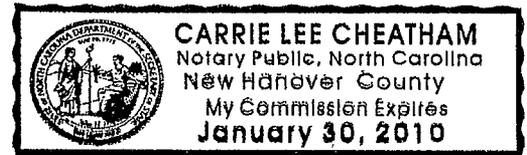
New Hanover County

I, Carrie Lee Cheatham, a Notary Public of said County and State, do hereby certify that Amy Conchas did personally appear and sign before me this the 2 day of June, 2008.

Carrie Lee Cheatham
Notary Public (signature)

(OFFICIAL SEAL)

My commission expires: Jan. 30, 2010



Site Cleanup Questionnaire Answers

Site Address: 2501-2509 Wrightsville Avenue
Date: May 14, 2008
ECS Personnel: Amy Conchas

The majority of the responses to the Site Cleanup Questionnaire were unknown due to the lack of assessment at the site. The site is located in an area of mixed use in Wilmington, North Carolina. The adjoining properties consist of residential and commercial properties. The release was discovered as a result of a composite soil sample collected from buried building debris encountered during a Phase I Environmental Site Assessment (ESA) dated March 31, 2008. The composite sample was analyzed for volatile and semi-volatile organic compounds using EPA Methods 8260 and 8270. The results of the analysis identified concentrations of poly aromatic hydrocarbons (PAHs). The source of the PAHs is unknown at this time; however, potential sources observed in the debris include metal parts, empty metal containers and what appeared to be a layer of soot and coal.

Additional assessment of the site has not occurred since the Phase I ESA. Therefore, ECS does not know the extent of the PAH impacted soil, if additional compounds are associated with the impacted soil or if groundwater has been impacted. Additionally, a receptor survey has not been performed on the site, so we do not know the location of drinking water wells or surface water intakes. However, the site is located in an area of Wilmington which is currently and has historically been serviced by municipal water supply. ECS performed a vehicle reconnaissance of the surrounding approximate 1,500 feet and did not observe water supply wells within the 1,500 foot radius.



Approximate Scale 1 inch = 1,100 feet.
 Contour Interval = 5 feet

FIGURE 1: TOPOGRAPHIC MAP

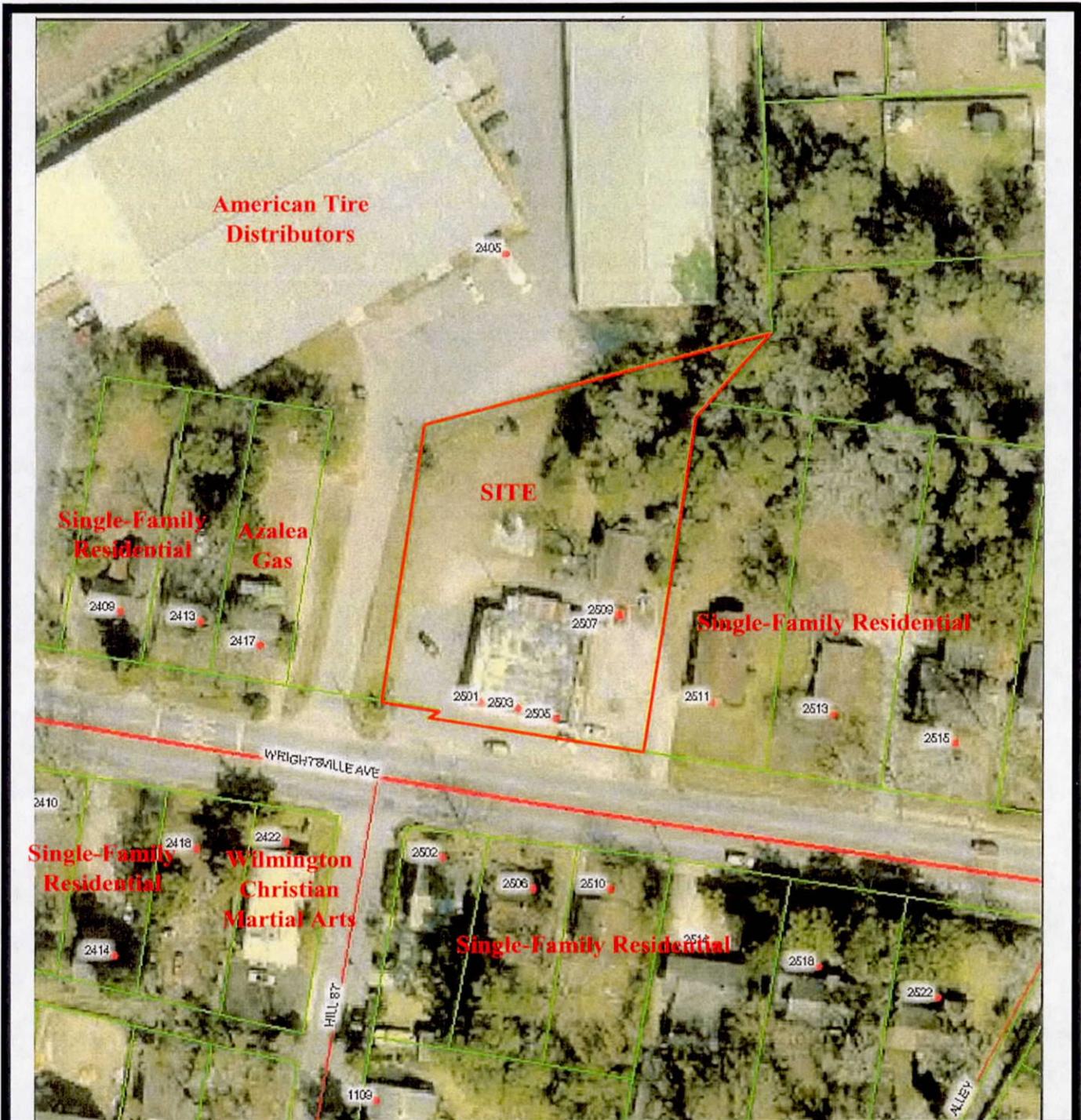
Source: USGS, Wilmington, North Carolina Quadrangle 1979.



Phase I Environmental Site Assessment
 2501, 2503, 2507 and 2509 Wrightsville Ave.
 Wilmington, North Carolina



ECS Project No. 22-13842
 March 2008



Not To Scale

FIGURE 2: SITE MAP

Source: New Hanover County on-line GIS, 2006 Aerial Photograph



Phase I Environmental Site Assessment
 2501, 2503, 2507 and 2509 Wrightsville Ave.
 Wilmington, North Carolina



ECS Project No. 22-13842
 March 2008



Amy Conchas
ECS
7211 Ogden Business Park
Suite 201
Wilmington, NC 28411

Report Number: G161-2735

Client Project: Wrightsville Ave

Dear Amy Conchas,

Enclosed are the results of the analytical services performed under the referenced project. The samples are certified to meet the requirements of the National Environmental Laboratory Accreditation Conference Standards. Copies of this report and supporting data will be retained in our files for a period of five years in the event they are required for future reference. Any samples submitted to our laboratory will be retained for a maximum of thirty (30) days from the date of this report unless other arrangements are requested.

If there are any questions about the report or services performed during this project, please call Lori Lockamy at (910) 350-1903. We will be happy to answer any questions or concerns which you may have.

Thank you for using SGS Environmental Services for your analytical services. We look forward to working with you again on any additional analytical needs.

Sincerely,
SGS Environmental Services, Inc.

Lori Lockamy
2008.03.24 17:26:24 -05'00'

Project Manager
Lori Lockamy

Date

List of Reporting Abbreviations and Data Qualifiers

B = Compound also detected in batch blank

BQL = Below Quantitation Limit (RL or MDL)

DF = Dilution Factor

Dup = Duplicate

D = Detected, but RPD is > 40% between results in dual column method.

E = Estimated concentration, exceeds calibration range.

J = Estimated concentration, below calibration range and above MDL

LCS(D) = Laboratory Control Spike (Duplicate)

MDL = Method Detection Limit

MS(D) = Matrix Spike (Duplicate)

PQL = Practical Quantitation Limit

RL = Reporting Limit

RPD = Relative Percent Difference

mg/kg = milligram per kilogram, ppm, parts per million

ug/kg = micrograms per kilogram, ppb, parts per billion

mg/L = milligram per liter, ppm, parts per million

ug/L = micrograms per liter, ppb, parts per billion

% Rec = Percent Recovery

% solids = Percent Solids

Special Notes:

- 1) Metals and mercury samples are digested with a hot block, see the standard operating procedure document for details.
- 2) Uncertainty for all reported data is less than or equal to 30 percent.



Print Date: 3/21/2008

Client Sample ID: S-1
Client Project ID: Wrightsville Ave
Lab Sample ID: G161-2735-1B
Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
Received Date: 14-Mar-08
Matrix: SOIL
Solids: 90.53
Basis: Dry

Results by 8260SOLO

<u>PARAMETER</u>	<u>Result</u>	<u>RL/CL</u>	<u>Units</u>	<u>DF</u>	<u>Date Analyzed</u>
Acetone	BQL	0.0541	MG/KG	1	19-Mar-08 13:28
Benzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromochloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromodichloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromoform	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromomethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2-Butanone	BQL	0.0271	MG/KG	1	19-Mar-08 13:28
n-Butylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
sec-Butylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
tert-Butylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Carbon disulfide	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Carbon tetrachloride	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chloroform	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2-Chlorotoluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
4-Chlorotoluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Dibromochloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dibromo-3-chloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Dibromomethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dibromoethane (EDB)	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,3-Dichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,4-Dichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
trans-1,4-Dichloro-2-butene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1-Dichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1-Dichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
cis-1,2-Dichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
trans-1,2-dichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,3-Dichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2,2-Dichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1-Dichloropropene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
cis-1,3-Dichloropropene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
trans-1,3-Dichloropropene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Dichlorodifluoromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Diisopropyl ether (DIPE)	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Ethylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Hexachlorobutadiene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2-Hexanone	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Iodomethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Isopropylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
4-Isopropyltoluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28



Print Date: 3/21/2008

Client Sample ID: S-1
Client Project ID: Wrightsville Ave
Lab Sample ID: G161-2735-1B
Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
Received Date: 14-Mar-08
Matrix: SOIL
Solids: 90.53
Basis: Dry

Results by 8260SOLO

<u>PARAMETER</u>	<u>Result</u>	<u>RL/CL</u>	<u>Units</u>	<u>DF</u>	<u>Date Analyzed</u>
Methylene chloride	BQL	0.0217	MG/KG	1	19-Mar-08 13:28
4-Methyl-2-pentanone	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Methyl-tert-butyl ether (MTBE)	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Naphthalene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
n-Propyl benzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Styrene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,1,2-Tetrachloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,2,2-Tetrachloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Tetrachloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Toluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,3-Trichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,4-Trichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Trichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,1-Trichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,2-Trichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Trichlorofluoromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,3-Trichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,4-Trimethylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,3,5-Trimethylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Vinyl chloride	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
m-,p-Xylene	BQL	0.0108	MG/KG	1	19-Mar-08 13:28
o-Xylene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28

Surrogates

1,2-Dichloroethane-d4	165	55-173	%	1	19-Mar-08 13:28
Toluene-d8	97	57-134	%	1	19-Mar-08 13:28
4-Bromofluorobenzene	54	23-141	%	1	19-Mar-08 13:28

Batch Information

Analytical Batch: 9031908
Analytical Method: 8260SOLO
Instrument: MSD9
Analyst: MJC

Prep Batch:
Prep Method:
Prep Date/Time:
Initial Prep Wt./Vol.: 5.099999905
Prep Extract Vol: 5



Print Date: 3/21/2008

Client Sample ID: S-1
Client Project ID: Wrightsville Ave
Lab Sample ID: G161-2735-1F
Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
Received Date: 14-Mar-08
Matrix: SOIL
Solids: 90.53
Basis: Dry

Results by 8270

<u>PARAMETER</u>	<u>Result</u>	<u>RL/CL</u>	<u>Units</u>	<u>DF</u>	<u>Date Analyzed</u>
Acenaphthene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Acenaphthylene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Anthracene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[a]anthracene	0.355	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[a]pyrene	0.402	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[b]fluoranthene	0.620	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[g,h,i]perylene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[k]fluoranthene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Benzoic Acid	BQL	0.670	MG/KG	1	17-Mar-08 20:32
Bis(2-chloroethoxy)methane	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Bis(2-chloroethyl)ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Bis(2-chloroisopropyl)ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Bis(2-ethylhexyl)phthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-bromophenyl phenyl ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Butylbenzylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Chloronaphthalene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Chlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-Chloro-3-methylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-Chloroaniline	BQL	1.67	MG/KG	1	17-Mar-08 20:32
4-Chlorophenyl phenyl ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Chrysene	0.425	0.335	MG/KG	1	17-Mar-08 20:32
Dibenzo[a,h]anthracene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Dibenzofuran	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Di-n-Butylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
1,2-Dichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
1,3-Dichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
1,4-Dichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
3,3'-Dichlorobenzidine	BQL	0.670	MG/KG	1	17-Mar-08 20:32
2,4-Dichlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Diethylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Dimethylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,4-Dimethylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Di-n-octylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4,6-Dinitro-2-methylphenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
2,4-Dinitrophenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
2,4-Dinitrotoluene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,6-Dinitrotoluene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Diphenylamine *	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Fluoranthene	0.693	0.335	MG/KG	1	17-Mar-08 20:32
Fluorene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Hexachlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Hexachlorobutadiene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Hexachlorocyclopentadiene	BQL	0.670	MG/KG	1	17-Mar-08 20:32
Hexachloroethane	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Indeno(1,2,3-c,d)pyrene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Isophorone	BQL	0.335	MG/KG	1	17-Mar-08 20:32



Print Date: 3/21/2008

Client Sample ID: S-1
Client Project ID: Wrightsville Ave
Lab Sample ID: G161-2735-1F
Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
Received Date: 14-Mar-08
Matrix: SOIL
Solids: 90.53
Basis: Dry

Results by 8270

<u>PARAMETER</u>	<u>Result</u>	<u>RL/CL</u>	<u>Units</u>	<u>DF</u>	<u>Date Analyzed</u>
2-Methylnaphthalene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Methylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
3- & 4-Methylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Naphthalene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Nitroaniline	BQL	0.335	MG/KG	1	17-Mar-08 20:32
3-Nitroaniline	BQL	1.67	MG/KG	1	17-Mar-08 20:32
4-Nitroaniline	BQL	1.67	MG/KG	1	17-Mar-08 20:32
Nitrobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Nitrophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-Nitrophenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
N-Nitrosodi-n-propylamine	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Pentachlorophenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
Phenanthrene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Phenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Pyrene	0.693	0.335	MG/KG	1	17-Mar-08 20:32
1,2,4-Trichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,4,5-Trichlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,4,6-Trichlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32

Surrogates

2-Fluorobiphenyl	90	48-123	%	1	17-Mar-08 20:32
2-Fluorophenol	74	42-123	%	1	17-Mar-08 20:32
Nitrobenzene-d5	88	46-117	%	1	17-Mar-08 20:32
Phenol-d6	80	48-125	%	1	17-Mar-08 20:32
2,4,6-Tribromophenol	88	41-129	%	1	17-Mar-08 20:32
4-Terphenyl-d14	90	44-140	%	1	17-Mar-08 20:32

Batch Information

Analytical Batch: 7031708
Analytical Method: 8270
Instrument: MSD7
Analyst: DES

Prep Batch: 10718
Prep Method: 3541
Prep Date/Time: 17-Mar-08 10:00
Initial Prep Wt./Vol.: 32.98
Prep Extract Vol: 10.0



CHAIN OF CUSTODY RECORD
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 - North Carolina

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077952

1 CLIENT: <u>ECS Carolinas LLP</u> CONTACT: <u>Amy Conchas</u> PHONE NO.: <u>(910) 686-9114</u> PROJECT: <u>Wrightsville Ave.</u> SITE/PWSID#: _____ REPORTS TO: <u>Amy Conchas</u> E-MAIL: <u>adesaix@ecslimited.com</u> <u>ECS Carolinas</u> FAX NO.: <u>(910) 686-9666</u> INVOICE TO: <u>ECS Carolinas</u> QUOTE # _____ P.O. NUMBER <u>13842</u>					SGS Reference: <u>G161-2735</u>					PAGE <u>1</u> OF <u>1</u>		
					CONTAINERS	Preservatives Used <input checked="" type="checkbox"/>						
						C= COMP G= GRAB	Analysis Required 3 <u>8260</u> <u>8270</u>					
LAB NO.	SAMPLE IDENTIFICATION	DATE	TIME	MATRIX								
	<u>S-1</u>	<u>3/14/08</u>	<u>14:47</u>	<u>S</u>	<u>S</u>	<u>C</u>	<u>X</u>	<u>X</u>				
					4		Shipping Carrier: _____ Shipping Ticket No: _____ Special Deliverable Requirements: _____			Samples Received Cold? (Circle) <u>YES</u> NO on ice coming down to temp Temperature (C): <u>8</u> <u>7</u> Chain of Custody Seal: (Circle) INTACT BROKEN <u>ABSENT</u>		
5					4		Special Instructions: _____ Requested Turnaround Time: _____ <input type="checkbox"/> RUSH _____ <input checked="" type="checkbox"/> STD _____ Date Needed					
Collected/Relinquished By: (1) <u>Amy Conchas</u>		Date	Time	Received By: _____ <u>3/14/08 15:38</u>								
Relinquished By: (2)		Date	Time	Received By: _____								
Relinquished By: (3)		Date	Time	Received By: _____								
Relinquished By: (4)		Date	Time	Received By: _____								

Page 7 of 7



North Carolina Department of Environment and Natural Resources

Dexler R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

May 8, 2008

Mr. Stephen E. Pike
PO Drawer 2687
Chapel Hill, NC 27515-2687

Re: **NOTICE OF REGULATORY REQUIREMENTS FOR CONTAMINANT ASSESSMENT
AND CLEANUP**

2501-2509 Wrightsville Avenue
Wilmington, New Hanover County, NC

Dear Mr. Pike:

We received your April 16, 2008 facsimile, which reports that your site has been contaminated by one or more hazardous substances. Depending on the contaminants involved and whether the contaminants have impacted or may impact groundwater quality, you will be required to assess and cleanup the contamination under one or more cleanup authorities. Regulatory oversight for the assessment and cleanup under all applicable authorities will be provided by the Division of Waste Management through its Superfund Section, Inactive Hazardous Sites Branch ("Branch").

Based on information provided to date, the Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310, et seq., applies to your site. In addition, initial immediate actions may be required under 15A NCAC 2L, Groundwater Classifications and Standards.

I. ACTIONS REQUIRED AT THIS TIME:

Complete the Notification of an Inactive Hazardous Substance or Waste Disposal Site

Pursuant to N.C. Gen. Stat. § 130A-310A.1(b), within 90 days of the date on which an owner, operator, or responsible party knows or should know of the existence of an inactive hazardous substance or waste disposal site, the owner, operator, or responsible party must submit to the Division all site data that is known or readily available to the owner, operator, or responsible party. Any person who has information concerning a possible inactive hazardous substance or waste disposal site is also encouraged to fill out the notification form. The notification form is located at our website at http://www.wastenotnc.org/sfhome/Notification_Form.PDF.

Complete the Site Cleanup Questionnaire.

To comply with the requirements of State law, a Site Cleanup Questionnaire, available on the website noted at the end of this letter, must be completed and returned to this office. The information you provide will be reviewed along with other information to prioritize the site, so please make certain that the information you provide is complete and accurate. Please note that your failure to inform the Branch of any nearby potable wells or other high risk conditions may adversely affect the Branch's ability to identify this site as a higher-risk site.

Take Initial Abatement Actions Required Under 15A NCAC 2L.

If you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of contamination. Beyond initial abatement actions, all assessment and remediation will be done through the IHSRA.

II. FUTURE ASSESSMENT AND CLEANUP ACTIVITIES:

All correspondence regarding this site should be sent to the Branch. Future assessment and cleanup activities (activities conducted after the initial abatement steps required in 15A NCAC 2L) may be conducted through the Voluntary Cleanup Program (discussed below) or pursuant to an Order issued under N.C. Gen. Stat. § 130A-310.3. In addition, if you choose not to conduct a cleanup through the Voluntary Cleanup Program, the site may be referred to the United States Environmental Protection Agency ("EPA"). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act ("CERCLA").

III. VOLUNTARY CLEANUP PROGRAM:

Under the IHSRA, persons who move forward to assess and remediate contamination, without being compelled to do so through formal legal action filed against them, are called "volunteers." To participate in the voluntary cleanup program, you will be required to enter into an administrative agreement with the Branch. The voluntary cleanup will proceed through the Registered Environmental Consultant Program or under direct oversight by the Branch Staff, as discussed below:

Agreement to Conduct Assessment and Remediation Through the Registered Environmental Consultant Program.

The Branch has a privatized oversight arm of the voluntary cleanup program known as the Registered Environmental Consultant ("REC") program. Based on the responses provided on the questionnaire (degree of hazard and public interest in the site), the Branch will determine whether a staff person or an REC will perform the oversight and approval of your assessment and cleanup action. Please note that having one or more of the conditions identified on the questionnaire does not necessarily preclude the site for qualifying for an REC-directed cleanup action.

Under the REC program, the volunteer hires an environmental consulting firm, which the State has approved as having met certain qualifications, to implement a cleanup and certify that the work is being performed in compliance with regulations. In other words, the REC's certifications of compliance are in place of direct oversight by the Branch. Details of the REC program can be found at <http://www.wastenotnc.org/sfhome/recprog.htm>. If you have any questions specific to the REC Program, including how to participate, please contact the REC Program Manager, Kim Caulk, at (919) 508-8451.

Agreement to Conduct Assessment and Remediation Under State Oversight.

If the Branch determines that the site should be assessed and remediated pursuant to direct State oversight, it will not be eligible for a REC-directed cleanup. Rather, the remedial action will receive direct oversight by Branch staff.

IV. FAILURE TO RESPOND:

If we do not receive a completed notification and questionnaire, the Branch will take further action to prioritize the site without your input. Failure to take the initial abatement steps required in 15A NCAC 2L may result in the assessment of a civil penalty against you. In addition, the Branch may seek an injunction compelling compliance with the initial abatement steps required in 15A NCAC 2L. For future work beyond the initial abatement steps required pursuant to 15A NCAC 2L, a unilateral Order may be issued pursuant to § 130A-310.3 to compel assessment and cleanup.

V. ADDITIONAL INFORMATION REGARDING THE IHSRA AND THE BRANCH:

People are often confused by the name of the Inactive Hazardous Sites Response Act and the Branch. By definition, "Inactive Hazardous Sites" are any areas where hazardous substances have come to be located and would include active and inactive facilities and a variety of property types. The term "inactive" simply refers to the fact that cleanup was inactive at large numbers of sites at the time of program enactment. Additional information about the Branch may be found at <http://www.wastenotnc.org/sfhome/ihsbrnch.htm>.

Submit completed questionnaire to: Sue Robbins
Inactive Hazardous Sites Branch
127 Cardinal Drive Extension
Wilmington, NC 28403

If you have additional questions about the requirements that apply to your site, please contact me at (910) 796-7411.

Sincerely,



Sue Robbins
Hydrogeologist
Inactive Hazardous Sites Branch
Superfund Section
Division of Waste Management

cc: IHSB Files



ECS Carolinas, LLP

7211 Ogden Business Park, Suite 201

Wilmington, NC 28411

Tel: 910-686-9114

Fax: 910-686-9666

Fax

To: Waste Management Fax: 910-350-2004

Company: NCDENR Phone: 910-796-7215

From: Patricia Myers Trust
WJA dtd 2/4/2004 by Pages: 10

Re: Investors Trust Company, Trustee Date: 4/16/08

Wrightsville Ave

- Urgent For Review Please Comment Please Reply

Attached are the results of a soil sample collected at the property located at 2501, 2503, 2507 and 2509 Wrightsville Avenue. Concentrations of SVOCs were detected in the soil sample.



Investors Trust Company

Stephen E. Pike
Managing Director

121 North Columbia Street (27514)
 P.O. Drawer 2687, Chapel Hill, NC 27515-2687
 919/945-2459, 800/326-4842 Fax: 919/968-4880
 Mobile: 919/698-5881
 Email: spike@invtitle.com
 www.invtitle.com

*** TX REPORT ***

TRANSMISSION OK
TX/RX NO 2002
RECIPIENT ADDRESS 19103502004
DESTINATION ID
ST. TIME 05/02 11:23
TIME USE 01'38
PAGES SENT 12
RESULT OK

-new site letter
- data entry form



ECS Carolinas, LLP

7211 Ogden Business Park, Suite 201

Wilmington, NC 28411

Tel: 910-686-9114 Fax: 910-686-9666

Fax

To: Waste Management Fax: 910-350-2004
Company: NC DENR Phone: 910-796-7215
From: Patricia Myers Trust + u/A dtd 2/4/2004 by Pages: 10
Re: Investors Trust Company, Trustee Date: 4/16/08
Wrightsville Ave

- Urgent For Review Please Comment Please Reply

Attached are the results of a soil sample collected at the property located at 2501, 2503, 2507 and 2509 Wrightsville Avenue. Concentrations of SVOCs were detected in the soil sample.



Investors Trust Company

*** TX REPORT ***

TRANSMISSION OK
TX/RX NO 1984
RECIPIENT ADDRESS 19103502004
DESTINATION ID
ST. TIME 04/16 13:42
TIME USE 02'39
PAGES SENT 11
RESULT OK

Ms. Robbins,
Sorry you did
not receive all
pages. This is
my confirmation
Steve Plu
(919) 945 2459



ECS Carolinas, LLP

7211 Ogden Business Park, Suite 201

Wilmington, NC 28411

Tel: 910-686-9114 Fax: 910-686-9666

Fax

To: Waste Management Fax: 910-350-2004
Company: NC DENR Phone: 910-796-7215
From: Patricia Myers Trust +
WA dtd 2/4/2004 by Pages: 10
Re: Investors Trust Company, Trustee Date: 4/16/08
Wrightsville Ave.

- Urgent For Review Please Comment Please Reply

Attached are the results of a soil sample collected at the property located at 2501, 2503, 2507 and 2509 Wrightsville Avenue. Concentrations of SVOCs were detected in the soil sample.



Investors Trust Company

7.0 ADDITIONAL SERVICES

7.1 Non-Scope Issues

ASTM guidelines identify non-scope issues, which are beyond the scope of this practice. Non-scope issues have the potential to be business environmental risks. Some of these non-scope issues include; asbestos-containing building materials, radon, lead-based paint, lead in drinking water, wetlands and mold.

We were authorized to conduct the following non-scope issues for the site:

ECS was requested to collect soil samples in the areas of the solvent odor observed during the building demolition activities. The solvent odor was previously observed by Mr. Macellaro and ECS personnel in January 2008. On March 14, 2008, ECS and Mr. Macellaro arrived on-site to excavate the area of the former solvent odor. Mr. Macellaro excavated approximately ten test pits in an attempt to locate the area of the former solvent odor. A soot and coal layer was encountered at a depth of approximately three to four feet below ground surface throughout the site. Additionally, debris such as brick, terra cotta and metal were encountered throughout the site, in each test pit excavated. Field screening of the soil for organic vapors using a photoionization detector did not indicate organic vapor readings. Additionally, ECS was unable to locate areas of soil staining or noticeable odor. Therefore, ECS collected a composite sample from multiple test pits.

The soil sample was analyzed for volatile and semi-volatile organic compounds (VOCs and SVOCs) using EPA Methods 8260 and 8270. Copies of the laboratory data sheets are included in Appendix IV. The results of the analysis identified the following SVOCs in the composite sample.

Benzo[a]anthracene at 0.355 mg/kg;	0.022 C
Benzo[a]pyrene at 0.402 mg/kg;	0.022 C
Benzo[b]fluoranthene at 0.620 mg/kg;	2.2 C
Chrysene at 0.425 mg/kg;	2.2 C
Fluoranthene at 0.693 mg/kg; and	460 N
Pyrene at 0.693 mg/kg	460 N

The benzo[a]anthracene concentration of 0.355 exceeds the North Carolina soil-to-groundwater maximum soil contaminant concentration (MSCC) of 0.34 mg/kg. The benzo[a]pyrene concentration of 0.402 exceeds the soil-to-groundwater MSCC of 0.091 mg/kg. These concentrations are considered reportable concentrations and are required to be reported by the property owner to the North Carolina Department of Environment and Natural Resources.

7.2 Previous Reports Review

We have not conducted previous environmental and/or engineering assessment activities at the site.

We have not been provided with environmental or engineering assessment reports for the site completed by others.

Phase I Environmental Site Assessment
Vacant Parcel of Land
2501, 2503, 2505, 2507 and 2509 Wrightsville Ave.
Wilmington, North Carolina

CLIENT

United Excavation Services, Inc.
6720 Finian Drive
Wilmington, North Carolina 28409

SUBMITTED BY

ECS Carolinas, LLP
7211 Ogden Business Park
Suite 201
Wilmington, North Carolina 28411

PROJECT

22-13842

DATE

March 31, 2008



Amy Conchas
ECS
7211 Ogden Business Park
Suite 201
Wilmington, NC 28411

Report Number: G161-2735

Client Project: Wrightsville Ave

Dear Amy Conchas,

Enclosed are the results of the analytical services performed under the referenced project. The samples are certified to meet the requirements of the National Environmental Laboratory Accreditation Conference Standards. Copies of this report and supporting data will be retained in our files for a period of five years in the event they are required for future reference. Any samples submitted to our laboratory will be retained for a maximum of thirty (30) days from the date of this report unless other arrangements are requested.

If there are any questions about the report or services performed during this project, please call Lori Lockamy at (910) 350-1903. We will be happy to answer any questions or concerns which you may have.

Thank you for using SGS Environmental Services for your analytical services. We look forward to working with you again on any additional analytical needs.

Sincerely,
SGS Environmental Services, Inc.

Lori Lockamy
2008.03.24 17:26:24 -05'00'

Project Manager
Lori Lockamy

Date

List of Reporting Abbreviations and Data Qualifiers

B = Compound also detected in batch blank

BQL = Below Quantitation Limit (RL or MDL)

DF = Dilution Factor

Dup = Duplicate

D = Detected, but RPD is > 40% between results in dual column method.

E = Estimated concentration, exceeds calibration range.

J = Estimated concentration, below calibration range and above MDL

LCS(D) = Laboratory Control Spike (Duplicate)

MDL = Method Detection Limit

MS(D) = Matrix Spike (Duplicate)

PQL = Practical Quantitation Limit

RL = Reporting Limit

RPD = Relative Percent Difference

mg/kg = milligram per kilogram, ppm, parts per million

ug/kg = micrograms per kilogram, ppb, parts per billion

mg/L = milligram per liter, ppm, parts per million

ug/L = micrograms per liter, ppb, parts per billion

% Rec = Percent Recovery

% solids = Percent Solids

Special Notes:

- 1) Metals and mercury samples are digested with a hot block, see the standard operating procedure document for details.
- 2) Uncertainty for all reported data is less than or equal to 30 percent.



Print Date: 3/21/2008

Client Sample ID: S-1
Client Project ID: Wrightsville Ave
Lab Sample ID: G161-2735-1B
Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
Received Date: 14-Mar-08
Matrix: SOIL
Solids: 90.53
Basis: Dry

Results by 8260SOLO

PARAMETER	Result	RL/CL	Units	DF	Date Analyzed
Acetone	BQL	0.0541	MG/KG	1	19-Mar-08 13:28
Benzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromochloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromodichloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromoform	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromomethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2-Butanone	BQL	0.0271	MG/KG	1	19-Mar-08 13:28
n-Butylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
sec-Butylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
tert-Butylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Carbon disulfide	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Carbon tetrachloride	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chloroform	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2-Chlorotoluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
4-Chlorotoluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Dibromochloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dibromo-3-chloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Dibromomethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dibromoethane (EDB)	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,3-Dichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,4-Dichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
trans-1,4-Dichloro-2-butene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1-Dichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1-Dichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
cis-1,2-Dichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
trans-1,2-dichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,3-Dichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2,2-Dichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1-Dichloropropene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
cis-1,3-Dichloropropene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
trans-1,3-Dichloropropene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Dichlorodifluoromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Diisopropyl ether (DIPE)	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Ethylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Hexachlorobutadiene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2-Hexanone	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Iodomethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Isopropylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
4-Isopropyltoluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28



Print Date: 3/21/2008

Client Sample ID: S-1
Client Project ID: Wrightsville Ave
Lab Sample ID: G161-2735-1B
Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
Received Date: 14-Mar-08
Matrix: SOIL
Solids: 90.53
Basis: Dry

Results by 8260SOLO

PARAMETER	Result	RL/CL	Units	DF	Date Analyzed
Methylene chloride	BQL	0.0217	MG/KG	1	19-Mar-08 13:28
4-Methyl-2-pentanone	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Methyl-tert-butyl ether (MTBE)	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Naphthalene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
n-Propyl benzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Styrene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,1,2-Tetrachloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,2,2-Tetrachloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Tetrachloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Toluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,3-Trichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,4-Trichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Trichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,1-Trichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,2-Trichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Trichlorofluoromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,3-Trichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,4-Trimethylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,3,5-Trimethylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Vinyl chloride	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
m-,p-Xylene	BQL	0.0108	MG/KG	1	19-Mar-08 13:28
o-Xylene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28

Surrogates

1,2-Dichloroethane-d4	165	55-173	%	1	19-Mar-08 13:28
Toluene-d8	97	57-134	%	1	19-Mar-08 13:28
4-Bromofluorobenzene	54	23-141	%	1	19-Mar-08 13:28

Batch Information

Analytical Batch: 9031908
Analytical Method: 8260SOLO
Instrument: MSD9
Analyst: MJC

Prep Batch:
Prep Method:
Prep Date/Time:
Initial Prep Wt./Vol.: 5.09999905
Prep Extract Vol: 5



Print Date: 3/21/2008

Client Sample ID: S-1
Client Project ID: Wrightsville Ave
Lab Sample ID: G161-2735-1F
Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
Received Date: 14-Mar-08
Matrix: SOIL
Solids: 90.53
Basis: Dry

Results by 8270

PARAMETER	Result	RL/CL	Units	DF	Date Analyzed
Acenaphthene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Acenaphthylene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Anthracene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[a]anthracene	0.355	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[a]pyrene	0.402	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[b]fluoranthene	0.620	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[g,h,i]perylene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[k]fluoranthene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Benzoic Acid	BQL	0.670	MG/KG	1	17-Mar-08 20:32
Bis(2-chloroethoxy)methane	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Bis(2-chloroethyl)ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Bis(2-chloroisopropyl)ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Bis(2-ethylhexyl)phthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-bromophenyl phenyl ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Butylbenzylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Chloronaphthalene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Chlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-Chloro-3-methylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-Chloroaniline	BQL	1.67	MG/KG	1	17-Mar-08 20:32
4-Chlorophenyl phenyl ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Chrysene	0.425	0.335	MG/KG	1	17-Mar-08 20:32
Dibenzo[a,h]anthracene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Dibenzofuran	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Di-n-Butylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
1,2-Dichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
1,3-Dichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
1,4-Dichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
3,3'-Dichlorobenzidine	BQL	0.670	MG/KG	1	17-Mar-08 20:32
2,4-Dichlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Diethylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Dimethylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,4-Dimethylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Di-n-octylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4,6-Dinitro-2-methylphenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
2,4-Dinitrophenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
2,4-Dinitrotoluene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,6-Dinitrotoluene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Diphenylamine *	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Fluoranthene	0.693	0.335	MG/KG	1	17-Mar-08 20:32
Fluorene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Hexachlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Hexachlorobutadiene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Hexachlorocyclopentadiene	BQL	0.670	MG/KG	1	17-Mar-08 20:32
Hexachloroethane	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Indeno(1,2,3-c,d)pyrene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Isophorone	BQL	0.335	MG/KG	1	17-Mar-08 20:32



Print Date: 3/21/2008

Client Sample ID: S-1
Client Project ID: Wrightsville Ave
Lab Sample ID: G161-2735-1F
Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
Received Date: 14-Mar-08
Matrix: SOIL
Solids: 90.53
Basis: Dry

Results by 8270

PARAMETER	Result	RL/CL	Units	DF	Date Analyzed
2-Methylnaphthalene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Methylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
3- & 4-Methylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Naphthalene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Nitroaniline	BQL	0.335	MG/KG	1	17-Mar-08 20:32
3-Nitroaniline	BQL	1.67	MG/KG	1	17-Mar-08 20:32
4-Nitroaniline	BQL	1.67	MG/KG	1	17-Mar-08 20:32
Nitrobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Nitrophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-Nitrophenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
N-Nitrosodi-n-propylamine	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Pentachlorophenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
Phenanthrene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Phenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Pyrene	0.693	0.335	MG/KG	1	17-Mar-08 20:32
1,2,4-Trichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,4,5-Trichlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,4,6-Trichlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Surrogates					
2-Fluorobiphenyl	90	48-123	%	1	17-Mar-08 20:32
2-Fluorophenol	74	42-123	%	1	17-Mar-08 20:32
Nitrobenzene-d5	88	46-117	%	1	17-Mar-08 20:32
Phenol-d6	80	48-125	%	1	17-Mar-08 20:32
2,4,6-Tribromophenol	88	41-129	%	1	17-Mar-08 20:32
4-Terphenyl-d14	90	44-140	%	1	17-Mar-08 20:32

Batch Information

Analytical Batch: 7031708
Analytical Method: 8270
Instrument: MSD7
Analyst: DES

Prep Batch: 10718
Prep Method: 3541
Prep Date/Time: 17-Mar-08 10:00
Initial Prep Wt./Vol.: 32.98
Prep Extract Vol: 10.0



ECS Carolinas,LLP

7211 Ogden Business Park, Suite 201

Wilmington, NC 28411

Tel: 910-686-9114 Fax: 910-686-9666

Fax

To: Waste Management Fax: 910-350-2004

Company: NCDENR Phone: 910-796-7215

From: Patricia Myers Trust + u/A dtd 2/4/2004 by Pages: 10

Re: Investors Trust Company, Trustee Date: 4/16/08

Wrightsville Ave.

- Urgent For Review Please Comment Please Reply

Attached are the results of a soil sample collected at the property located at 2501, 2503, 2507 and 2509 Wrightsville Avenue. Concentrations of SVOCs were detected in the soil sample.



Investors Trust Company

Stephen E. Pike
Managing Director

121 North Columbia Street (27514)
P.O. Drawer 2687, Chapel Hill, NC 27515-2687
919/945-2459, 800/326-4842 Fax: 919/968-4880
Mobile: 919/698-5881
Email: spike@invtitle.com
www.invtitle.com

919-945-2459

ECS Project No. 22-13842
March 31, 2008

- 28 -

7.0 ADDITIONAL SERVICES

7.1 Non-Scope Issues

ASTM guidelines identify non-scope issues, which are beyond the scope of this practice. Non-scope issues have the potential to be business environmental risks. Some of these non-scope issues include; asbestos-containing building materials, radon, lead-based paint, lead in drinking water, wetlands and mold.

We were authorized to conduct the following non-scope issues for the site:

ECS was requested to collect soil samples in the areas of the solvent odor observed during the building demolition activities. The solvent odor was previously observed by Mr. Macellaro and ECS personnel in January 2008. On March 14, 2008, ECS and Mr. Macellaro arrived on-site to excavate the area of the former solvent odor. Mr. Macellaro excavated approximately ten test pits in an attempt to locate the area of the former solvent odor. A soot and coal layer was encountered at a depth of approximately three to four feet below ground surface throughout the site. Additionally, debris such as brick, terra cotta and metal were encountered throughout the site, in each test pit excavated. Field screening of the soil for organic vapors using a photoionization detector did not indicate organic vapor readings. Additionally, ECS was unable to locate areas of soil staining or noticeable odor. Therefore, ECS collected a composite sample from multiple test pits.

The soil sample was analyzed for volatile and semi-volatile organic compounds (VOCs and SVOCs) using EPA Methods 8260 and 8270. Copies of the laboratory data sheets are included in Appendix IV. The results of the analysis identified the following SVOCs in the composite sample.

Benzo[a]anthracene at 0.355 mg/kg;
Benzo[a]pyrene at 0.402 mg/kg;
Benzo[b]fluoranthene at 0.620 mg/kg;
Chrysene at 0.425 mg/kg;
Fluoranthene at 0.693 mg/kg; and
Pyrene at 0.693 mg/kg

The benzo[a]anthracene concentration of 0.355 exceeds the North Carolina soil-to-groundwater maximum soil contaminant concentration (MSCC) of 0.34 mg/kg. The benzo[a]pyrene concentration of 0.402 exceeds the soil-to-groundwater MSCC of 0.091 mg/kg. These concentrations are considered reportable concentrations and are required to be reported by the property owner to the North Carolina Department of Environment and Natural Resources.


ECS Carolinas, LLP

7211 Ogden Business Park, Suite 201

Wilmington, NC 28411

Tel: 910-686-9114 Fax: 910-686-9666

Fax

To: Waste Management Fax: 910-350-2001
 Company: NCDENR Phone: 910-796-7215
 From: Patricia Myers Trust + u/A dtd 2/4/2004 by Investors Trust Company, Trustee Pages: 10
 Re: Date: 4/16/08
 Wrightsville Ave

 Urgent

 For Review

 Please Comment

 Please Reply

Attached are the results of a soil sample collected at the property located at 2501, 2503, 2507 and 2509 Wrightsville Avenue. Concentrations of SVOCs were detected in the soil sample.


Investors Trust Company
Stephen E. Pike
Managing Director

121 North Columbia Street (27514)
 P.O. Drawer 2687, Chapel Hill, NC 27515-2687
 919/945-2459, 800/326-4842 Fax: 919/968-4880
 Mobile: 919/698-5881
 Email: spike@invlltc.com
 www.invlltc.com

RECEIVED

MAY 02 2008

*** TX REPORT ***

TRANSMISSION OK

TX/RX NO 1984
RECIPIENT ADDRESS 19103502004
DESTINATION ID
ST. TIME 04/16 19:42
TIME USE 02:39
PAGES SENT 11
RESULT OK

*Ms. Robbins,
Sorry you did
not receive all
pages. This is
my confirmation
Steve Pl
(919) 945 2459*



ECS Carolinas, LLP
7211 Ogden Business Park, Suite 201
Wilmington, NC 28411
Tel: 910-686-9114 Fax: 910-686-9666

Fax

To: Waste Management Fax: 910-350-2001
Company: NC DENR Phone: 910-796-7215
From: Patricia Myers Trust Pages: 10
W/A dtd 2/4/2004 by
Investors Trust Company, Trustee Date: 4/16/08
Re: Wrightsville Ave

Urgent For Review Please Comment Please Reply

Attached are the results of a soil sample collected at the property located at 2501, 2503, 2507 and 2509 Wrightsville Avenue. Concentrations of SVOCs were detected in the soil sample.



Investors Trust Company

ECS Project No. 22-13842
March 31, 2008

- 28 -

7.0 ADDITIONAL SERVICES

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ASTM guidelines identify non-scope issues, which are beyond the scope of this practice. Non-scope issues have the potential to be business environmental risks. Some of these non-scope issues include; asbestos-containing building materials, radon, lead-based paint, lead in drinking water, wetlands and mold.

We were authorized to conduct the following non-scope issues for the site:

ECS was requested to collect soil samples in the areas of the solvent odor observed during the building demolition activities. The solvent odor was previously observed by Mr. Macellaro and ECS personnel in January 2008. On March 14, 2008, ECS and Mr. Macellaro arrived on-site to excavate the area of the former solvent odor. Mr. Macellaro excavated approximately ten test pits in an attempt to locate the area of the former solvent odor. A soot and coal layer was encountered at a depth of approximately three to four feet below ground surface throughout the site. Additionally, debris such as brick, terra cotta and metal were encountered throughout the site, in each test pit excavated. Field screening of the soil for organic vapors using a photoionization detector did not indicate organic vapor readings. Additionally, ECS was unable to locate areas of soil staining or noticeable odor. Therefore, ECS collected a composite sample from multiple test pits.

The soil sample was analyzed for volatile and semi-volatile organic compounds (VOCs and SVOCs) using EPA Methods 8260 and 8270. Copies of the laboratory data sheets are included in Appendix IV. The results of the analysis identified the following SVOCs in the composite sample.

Benzo[a]anthracene at 0.355 mg/kg;
Benzo[a]pyrene at 0.402 mg/kg;
Benzo[b]fluoranthene at 0.620 mg/kg;
Chrysene at 0.425 mg/kg;
Fluoranthene at 0.693 mg/kg; and
Pyrene at 0.693 mg/kg

The benzo[a]anthracene concentration of 0.355 exceeds the North Carolina soil-to-groundwater maximum soil contaminant concentration (MSCC) of 0.34 mg/kg. The benzo[a]pyrene concentration of 0.402 exceeds the soil-to-groundwater MSCC of 0.091 mg/kg. These concentrations are considered reportable concentrations and are required to be reported by the property owner to the North Carolina Department of Environment and Natural Resources.

ECS Project No. 22-13842
March 31, 2008

- 29 -

7.2 Previous Reports Review

We have not conducted previous environmental and/or engineering assessment activities at the site.

We have not been provided with environmental or engineering assessment reports for the site completed by others.

Phase I Environmental Site Assessment
Vacant Parcel of Land
2501, 2503, 2505, 2507 and 2509 Wrightsville Ave.
Wilmington, North Carolina

CLIENT

United Excavation Services, Inc.
6720 Finian Drive
Wilmington, North Carolina 28409

SUBMITTED BY

ECS Carolinas, LLP
7211 Ogden Business Park
Suite 201
Wilmington, North Carolina 28411

PROJECT

22-13842

DATE

March 31, 2008

SGS

Amy Conchas
ECS
7211 Ogden Business Park
Suite 201
Wilmington, NC 28411

Report Number: G161-2735

Client Project: Wrightsville Ave

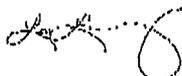
Dear Amy Conchas,

Enclosed are the results of the analytical services performed under the referenced project. The samples are certified to meet the requirements of the National Environmental Laboratory Accreditation Conference Standards. Copies of this report and supporting data will be retained in our files for a period of five years in the event they are required for future reference. Any samples submitted to our laboratory will be retained for a maximum of thirty (30) days from the date of this report unless other arrangements are requested.

If there are any questions about the report or services performed during this project, please call Lori Lockamy at (910) 350-1903. We will be happy to answer any questions or concerns which you may have.

Thank you for using SGS Environmental Services for your analytical services. We look forward to working with you again on any additional analytical needs.

Sincerely,
SGS Environmental Services, Inc.



Lori Lockamy
2008.03.24 17:26:24 -05'00'

Project Manager
Lori Lockamy

Date

List of Reporting Abbreviations and Data Qualifiers

B = Compound also detected in batch blank

BQL = Below Quantitation Limit (RL or MDL)

DF = Dilution Factor

Dup = Duplicate

D = Detected, but RPD is > 40% between results in dual column method.

E = Estimated concentration, exceeds calibration range.

J = Estimated concentration, below calibration range and above MDL

LCS(D) = Laboratory Control Spike (Duplicate)

MDL = Method Detection Limit

MS(D) = Matrix Spike (Duplicate)

PQL = Practical Quantitation Limit

RL = Reporting Limit

RPD = Relative Percent Difference

mg/kg = milligram per kilogram, ppm, parts per million

ug/kg = micrograms per kilogram, ppb, parts per billion

mg/L = milligram per liter, ppm, parts per million

ug/L = micrograms per liter, ppb, parts per billion

% Rec = Percent Recovery

% solids = Percent Solids

Special Notes:

- 1) Metals and mercury samples are digested with a hot block, see the standard operating procedure document for details.
- 2) Uncertainty for all reported data is less than or equal to 30 percent.



Print Date: 3/21/2008

Client Sample ID: S-1
 Client Project ID: Wrightsville Ave
 Lab Sample ID: G161-2735-1B
 Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
 Received Date: 14-Mar-08
 Matrix: SOIL
 Solids: 90.53
 Basis: Dry

Results by 8260SOLO

<u>PARAMETER</u>	<u>Result</u>	<u>RL/CL</u>	<u>Units</u>	<u>DF</u>	<u>Date Analyzed</u>
Acetone	BQL	0.0541	MG/KG	1	19-Mar-08 13:28
Benzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromochloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromodichloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromoform	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Bromomethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2-Butanone	BQL	0.0271	MG/KG	1	19-Mar-08 13:28
n-Butylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
sec-Butylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
tert-Butylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Carbon disulfide	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Carbon tetrachloride	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chloroform	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Chloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2-Chlorotoluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
4-Chlorotoluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Dibromochloromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dibromo-3-chloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Dibromomethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dibromoethane (EDB)	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,3-Dichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,4-Dichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
trans-1,4-Dichloro-2-butene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1-Dichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1-Dichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
cis-1,2-Dichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
trans-1,2-dichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2-Dichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,3-Dichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2,2-Dichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1-Dichloropropene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
cis-1,3-Dichloropropene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
trans-1,3-Dichloropropene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Dichlorodifluoromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Diisopropyl ether (DIPE)	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Ethylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Hexachlorobutadiene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
2-Hexanone	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Iodomethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Isopropylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
4-Isopropyltoluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28



Print Date: 3/21/2008

Client Sample ID: S-1
 Client Project ID: Wrightsville Ave
 Lab Sample ID: G161-2735-1B
 Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
 Received Date: 14-Mar-08
 Matrix: SOIL
 Solids: 90.53
 Basis: Dry

Results by 8260SOLO

<u>PARAMETER</u>	<u>Result</u>	<u>RL/CL</u>	<u>Units</u>	<u>DF</u>	<u>Date Analyzed</u>
Methylene chloride	BQL	0.0217	MG/KG	1	19-Mar-08 13:28
4-Methyl-2-pentanone	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Methyl-tert-butyl ether (MTBE)	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Naphthalene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
n-Propyl benzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Styrene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,1,2-Tetrachloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,2,2-Tetrachloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Tetrachloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Toluene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,3-Trichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,4-Trichlorobenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Trichloroethene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,1-Trichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,1,2-Trichloroethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Trichlorofluoromethane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,3-Trichloropropane	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,2,4-Trimethylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
1,3,5-Trimethylbenzene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
Vinyl chloride	BQL	0.00541	MG/KG	1	19-Mar-08 13:28
m,p-Xylene	BQL	0.0108	MG/KG	1	19-Mar-08 13:28
o-Xylene	BQL	0.00541	MG/KG	1	19-Mar-08 13:28

Surrogates

1,2-Dichloroethane-d4	165	55-173	%	1	19-Mar-08 13:28
Toluene-d8	97	57-134	%	1	19-Mar-08 13:28
4-Bromofluorobenzene	54	23-141	%	1	19-Mar-08 13:28

Batch Information

Analytical Batch: 9031908
 Analytical Method: 8260SOLO
 Instrument: MSD9
 Analyst: MJC

Prep Batch:
 Prep Method:
 Prep Date/Time:
 Initial Prep Wt./Vol.: 5.099999905
 Prep Extract Vol: 5



Print Date: 3/21/2008

Client Sample ID: S-1
 Client Project ID: Wrightsville Ave
 Lab Sample ID: G161-2735-1F
 Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
 Received Date: 14-Mar-08
 Matrix: SOIL
 Solids: 90.53
 Basis: Dry

Results by 8270

<u>PARAMETER</u>	<u>Result</u>	<u>RL/CL</u>	<u>Units</u>	<u>DF</u>	<u>Date Analyzed</u>
Acenaphthene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Acenaphthylene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Anthracene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[a]anthracene	0.355	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[a]pyrene	0.402	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[b]fluoranthene	0.620	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[g,h,i]perylene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Benzo[k]fluoranthene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Benzoic Acid	BQL	0.670	MG/KG	1	17-Mar-08 20:32
Bis(2-chloroethoxy)methane	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Bis(2-chloroethyl)ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Bis(2-chloroisopropyl)ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Bis(2-ethylhexyl)phthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-bromophenyl phenyl ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Butylbenzylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Chloronaphthalene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Chlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-Chloro-3-methylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-Chloroaniline	BQL	1.67	MG/KG	1	17-Mar-08 20:32
4-Chlorophenyl phenyl ether	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Chrysene	0.425	0.335	MG/KG	1	17-Mar-08 20:32
Dibenzo[a,h]anthracene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Dibenzofuran	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Di-n-Butylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
1,2-Dichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
1,3-Dichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
1,4-Dichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
3,3'-Dichlorobenzidine	BQL	0.670	MG/KG	1	17-Mar-08 20:32
2,4-Dichlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Diethylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Dimethylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,4-Dimethylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Di-n-octylphthalate	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4,6-Dinitro-2-methylphenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
2,4-Dinitrophenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
2,4-Dinitrotoluene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,6-Dinitrotoluene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Diphenylamine *	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Fluoranthene	0.693	0.335	MG/KG	1	17-Mar-08 20:32
Fluorene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Hexachlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Hexachlorobutadiene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Hexachlorocyclopentadiene	BQL	0.670	MG/KG	1	17-Mar-08 20:32
Hexachloroethane	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Indeno(1,2,3-c,d)pyrene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Isophorone	BQL	0.335	MG/KG	1	17-Mar-08 20:32



Print Date: 3/21/2008

Client Sample ID: S-1
 Client Project ID: Wrightsville Ave
 Lab Sample ID: G161-2735-1F
 Lab Project ID: G161-2735

Collection Date: 14-Mar-08 14:47
 Received Date: 14-Mar-08
 Matrix: SOIL
 Solids: 90.53
 Basis: Dry

Results by 8270

<u>PARAMETER</u>	<u>Result</u>	<u>RL/CL</u>	<u>Units</u>	<u>DF</u>	<u>Date Analyzed</u>
2-Methylnaphthalene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Methylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
3- & 4-Methylphenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Naphthalene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Nitroaniline	BQL	0.335	MG/KG	1	17-Mar-08 20:32
3-Nitroaniline	BQL	1.67	MG/KG	1	17-Mar-08 20:32
4-Nitroaniline	BQL	1.67	MG/KG	1	17-Mar-08 20:32
Nitrobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2-Nitrophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
4-Nitrophenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
N-Nitrosodi-n-propylamine	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Pentachlorophenol	BQL	1.67	MG/KG	1	17-Mar-08 20:32
Phenanthrene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Phenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
Pyrene	0.693	0.335	MG/KG	1	17-Mar-08 20:32
1,2,4-Trichlorobenzene	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,4,5-Trichlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32
2,4,6-Trichlorophenol	BQL	0.335	MG/KG	1	17-Mar-08 20:32

Surrogates

2-Fluorobiphenyl	90	48-123	%	1	17-Mar-08 20:32
2-Fluorophenol	74	42-123	%	1	17-Mar-08 20:32
Nitrobenzene-d5	88	46-117	%	1	17-Mar-08 20:32
Phenol-d6	80	48-125	%	1	17-Mar-08 20:32
2,4,6-Tribromophenol	88	41-129	%	1	17-Mar-08 20:32
4-Terphenyl-d14	90	44-140	%	1	17-Mar-08 20:32

Batch Information

Analytical Batch: 7031708
 Analytical Method: 8270
 Instrument: MSD7
 Analyst: DES

Prep Batch: 10718
 Prep Method: 3541
 Prep Date/Time: 17-Mar-08 10:00
 Initial Prep Wt./Vol.: 32.98
 Prep Extract Vol: 10.0



CHAIN OF CUSTODY RECORD
SGS Environmental Services Inc.

Locations Nationwide
 - Alaska - Hawaii
 - Ohio - Maryland
 - New Jersey - North Carolina
 - West Virginia

www.us.sgs.com

077952

1 CLIENT: <u>ECS Carolinas LLP</u> CONTACT: <u>Amy Conchas</u> PHONE NO: <u>910-686-9114</u> PROJECT: <u>Wrightsville Ave.</u> SITE/PWSID#: _____ REPORTS TO: <u>Amy Conchas</u> E-MAIL: <u>odesaix@earthlink.net</u> <u>ECS Carolinas</u> FAX NO.: <u>(910) 686-9666</u> INVOICE TO: <u>ECS Carolinas</u> QUOTE # _____ P.O. NUMBER <u>13842</u>					SGS Reference: <u>G161-2735</u>					PAGE <u>1</u> OF <u>1</u>	
2					No CONTAINERS SAMPLE TYPE Preservation Unit Analysis Required D- DUMP G- GRAB <u>8260</u> <u>8270</u>						
LAB NO.	SAMPLE IDENTIFICATION	DATE	TIME	MATRIX							
	<u>S-1</u>	<u>3/14/08</u>	<u>14:47</u>	<u>S</u>		<u>S</u>	<u>C</u>	<u>X</u>	<u>X</u>		
									REMARKS		
3 Collected/Relinquished By: (1) <u>Amy Conchas</u>			Date	Time	Received By:	Date	Time	4 Shipping Carrier: _____ Shipping Ticket No: _____ Special Deliverable Requirements: _____ Requested Turnaround Time: _____ <input type="checkbox"/> RUSH _____ Date Needed _____			
Relinquished By: (2)			Date	Time	Received By:	Date	Time	Samples Received Cold? (Circle) YES NO <u>NO</u> Temperature (C): <u>8</u> , <u>17</u> Chain of Custody Seal: (Circle) INTACT BROKEN <u>ABSENT</u>			
Relinquished By: (3)			Date	Time	Received By:	Date	Time	Special Instructions: _____			
Relinquished By: (4)			Date	Time	Received By:	Date	Time	<input type="checkbox"/> STD			

Page 7 of 7

05/02/2008 11:24 FAX

012/012