



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

July 2, 2009

Mr. Ashley Wooten
McDowell County Assistant Manager
60 East Court Street
Marion, North Carolina 28752

Re: McDowell County Sheriffs Department Firing Range, Marion, NC.

Dear Mr. Wooten

I have reviewed the Report of Lead Impacted Soil Screening for the firing range used by the sheriffs Department where a proposed poultry processing plant is being located.

I have the following comments on the results of the Report:

1. X-Ray fluorescence can be used as a screening tool for determining lead contamination in soil, however, it is difficult to make an adequate correlation between XRF readings and actual lead concentration in the soil at shooting ranges any given sample location. This is because a bullet fragment may be in, or near by the sample location causing a high lead result compared to a sample collected nearby that does not have a fragment in it. Because of this, more frequent laboratory sampling is required to determine the correlation between the actual lead concentration in the soil and the XRF results.
2. I do not agree that the removal of only part of the impacted berm is appropriate. I recommend that the entire berm be removed and, if financially feasible, have the lead fragments sifted out prior to sampling for waste determination and disposal. The XRF result of 336 at location SS-1 was not verified with a laboratory sample but another site where the XRF result was lower F-3 (300), had a laboratory result of 2550 mg/kg, exceeding the clean up level of 270 mg/kg. Without removing the entire berm, there will be no way for me to give the site a "no further action" letter.
3. I agree with the areas of the shooting range that are proposed to be excavated, however, I feel further laboratory sampling in other areas of the range must be conducted to confirm that the soil concentrations are below the Soil Screening Level.
4. If soil is determined to be a hazardous waste (TCLP result > 5 ppm), the soil cannot be stockpiled, it must be containerized (roll-off container).

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5. You must ensure that the soil in any area of the firing range that will be excavated during construction of the poultry processing plant is adequately characterized as being below the SSL prior to moving it to another location of the site or removing it from the site.

If you have any questions concerning this matter, please contact me at the number below

Sincerely,

Roberta Proctor, Environmental Chemist
Hazardous Waste Section

Cc: Brent Burch
Spring Allen
Central files