



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

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

July 29, 2009

Chris Kelly  
Terracon Consultants  
2020 Starita Road, Suite E  
Charlotte, North Carolina 28206

Re: Initial Site Sampling Plant/ Assessment and Clean-up Plan  
Former PCA facility, Matthews, NC.

Dear Mr. Kelly:

I have reviewed the ISSP/ ACP submitted on behalf of your client, CPI Corporation, for the assessment and remediation of the site referenced above. Please address the following comments either electronically or by US mail.

1. Please supply a diagram showing the location of the soil samples/ borings and other figures that are a part of, or referenced by, this plan.
2. The NC HWS Generator Closure Guidelines requires a minimum of five samples to determine background levels of metals.
3. Please show on the diagram the location of the background samples and the justification for using those location(s). Also include the additional background sample locations required and the justification for their location.
4. Please include all Appendices attached to, or referenced by, this plan.
5. To obtain a "clean closure" or "no further action" letter, the site must be cleaned up to the NC Hazardous Waste Section Soil Screening Levels, not industrial levels.
6. Please describe why silver is the only constituent of concern at this site. Include a site use history.
7. Ensure that all personnel who are conducting remedial activities are trained to the OSHA 1919.120 standard.

8. Excavated soil must be sampled after excavation for waste determination (TCLP analysis). Waste determination cannot be made on the *in situ*, previously collected samples.
9. If the confirmation samples collected at the bottom of the excavation(s) have silver levels below the NCHWS SSL and there are no other constituents of concern, then groundwater sampling will not be necessary.
10. The post-excavation samples must be collected at least every 20 feet along the bottom and each sidewall of the excavation(s).

If you have any questions, please contact me at the number listed below.

Sincerely,



Roberta Proctor, Environmental Chemist  
Hazardous Waste Section

Cc: Brent Burch  
Mark Burnette  
Central Files