

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Kathleen Z. Lawson
EPA ID: N C D 0 4 9 7 7 3 2 4 5
Facility Name: Trex Properties LLC
Document Group: Corrective Action (CA)
Document Type: RCRA Facility Investigation (RFI)
Description: Extension request for submittal of the Corrective Action Plan and cost estimate
Date of Doc: 3/4/2014
Author of Doc: David Craig

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Date Recieved by File Room:

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TREX PROPERTIES LLC

ELT TREX PROPERTIES LLC
1650 DES PERES RD., STE 303
SAINT LOUIS, MO 63131
314-835-1515 P
314-835-1616 F

March 4, 2014

Ms. Kathy Lawson
NCDENR, Division of Solid Waste Management
217 West Jones Street
Raleigh, NC 27603
VIA: USPS and email (kathleen.lawson@ncdenr.gov)

RE: Trex Properties, LLC
Request for extension for submission of Corrective Action Plan
3114 Cullman Ave.
Charlotte, NC 28206
EPA ID # NCD 049 773 245

Dear Ms. Lawson:

Trex properties, LLC (Trex) has received your letter dated February 25, 2014 concerning our failure to submit a Corrective Action Plan (CAP) and detailed cost estimate. Trex would like to request an extension until March 19th for the submission of the requested documents.

This extension has been requested due to a misunderstanding on our part the request included in NSDENR's December 2, 2013 letter, specifically our misunderstanding that the Corrective Action Plan (CAP) was only in support of financial assurance documentation which had previously been submitted. Also, our focus since the transfer of the property to Trex has not been on generating a CAP, but on the transfer of permits and obtaining access to various properties that were previously available to Detrex. The most compelling in recent months has been gaining access to the rail siding operated by Norfolk Southern Railroad (NFS) on the southern side of the property. Our focus on the access was due to a desire to complete any additional site delineation required in this area in support of interim remedial measures which could be conducted prior to, or in concert with, the Blue Line Project construction. To date our efforts to obtain access to the former rail spur operated by NFS have been in vain even though we went as far as trying to use Mecklenburg County's leverage with the Blue Line Project to gain access; in addition we have also reached out to NCDENR to see what help could be provided on your end. We intend to continue to push for access in this area and will continue to work with Mecklenburg County to see what can be done to expedite work behind 3114 Cullman Ave. However, due to our misunderstanding, the fact our primary focus for the last few months has been trying to establish an interim remedial measures program prior to the implementation of the Blue Line Project, and our recent conclusion that we will not be able to gain an access agreement with NFS, we are not able to provide the requested documents by March 5th. We do however believe that provided a two week extension those documents can be provided.

It is my understanding based on conversation with you, and Mr. Bud McCarty, that NCDENR is looking for the following to be part of the requested CAP:

TREX PROPERTIES LLC

1. An assessment plan which outlines what is proposed in order to complete delineation of soil and GW contamination at the site.
2. Our remedial strategy based on existing information for completing RCRA closure. This part of the CAP will outline treatment or remedial measures which may be used to address contamination at the site and will include a spreadsheet breaking out the costs for each phase of the work. It is understood the spreadsheet needs to provide details on the development of the estimated cost to complete corrective action, which is currently valued at \$1.2MM. It is my understanding the Department understands this part of the CAP will include some speculation, given that site delineation is not yet complete.

Trex would like to thank you in advance for your consideration in granting us with an additional two weeks to develop the documents you have requested. If you have any questions or comments please feel free to give me a call.

Best regards,



David Craig
Senior Project Manager

CC: Bud McCarty
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