

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Scott Ross
EPA ID: N C D 0 8 8 5 6 0 0 3 2
Facility Name: Ashland Raleigh
Document Group: Inspection/Investigation (I)
Document Type: Other (O)
Description: 2013 Annual RCRA Post-Closure Inspection Report (DENR responded to report in an email dated 4/17/13)
Date of Doc: 4/11/2013
Author of Doc: Patrick Stores, anteagroup

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Date Recieved by File Room:

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MEMORANDUM

To: Michael Dever, PG
Remediation Project Manager
Ashland Inc.
5200 Blazer Parkway, DS-4
Dublin, Ohio 43017

From: Patrick Storz

Date: April 11, 2013

Re: 2013 Annual RCRA Post-Closure Inspection
Former Ashland Distribution Company Facility
1415 South Bloodworth Street
Raleigh, North Carolina
Facility ID # NCD 088 560 032

Att: Photographic Log
Post-Closure Inspection Checklist

Cc: Mary Siedlecki – NCDENR
Don Malone – ARCADIS, Ryan Gerber – ARCADIS

Purpose

Antea USA of North Carolina, Inc. (Antea USA of NC), on behalf of Ashland Inc. (Ashland), is providing this memo to serve as documentation of the RCRA post-closure inspection completed at the former Ashland facility located at 1415 South Bloodworth Street, Raleigh, North Carolina.

Field Activities

On March 19, 2013, Antea USA of NC conducted an inspection of the concrete RCRA cap located at the above referenced site. The following observations were made during the site visit:

- The facility is enclosed by a security fence and the access gate located off South Bloodworth Street is locked during non-business hours. The RCRA concrete cap is surrounded by a fence secured with a pad-lock on the North, South and East sides, and by an approximate 10" high concrete cinder block wall covering a portion of the West side (a 6' gap exists).
- On inspection, Antea USA of NC observed that the tenant had removed the concrete cinder block wall that had previously surrounded a former tank farm at the facility and had acted to protect the West side of the RCRA cap. The cinder block wall debris was piled on and adjacent to the RCRA pad. Antea USA of NC informed the tenant that the RCRA cap should remain free of all materials and the tenant immediately removed all of the concrete cinder blocks and indicated that they would no longer store any materials on the RCRA cap. Also, a corner of the chain-link fence surrounding the RCRA cap had been bent, potentially degrading the condition of the fence. Mr. Wall, Elite Waste Services indicated that they would fix the bent pole and add a new section of chain-link fence to completely enclose the RCRA cap. This work is expected to occur in April 2013.
- Antea USA of NC personnel removed vegetation surrounding the perimeter of the RCRA cap.
- The RCRA cap surface was in good condition with no observable damage or cracks and no standing water was observed on the RCRA cap.

Ashland sent a letter to the property owner (Select Commercial Properties) and Elite Waste Services dated April 5, 2013 to document these required upgrades to the facility's current housekeeping measures, and to help ensure similar issues will not reoccur. A copy of the letter was also transmitted to Ms. Mary Siedlecki, North Carolina Department of Environment and Natural Resources, Hazardous Waste Section. Photographs of the RCRA cap and the post-closure inspection checklist are included as Attachments 1 and 2, respectively. If you have any questions, please contact me at (919) 655-4919.

Sincerely,

ANTEA USA OF NORTH CAROLINA, INC.



Patrick Storz
Project Manager



ATTACHMENT 1
PHOTOGRAPHIC LOG
FORMER ASHLAND DISTRIBUTION COMPANY FACILITY
1415 SOUTH BLOODWORTH STREET
RALEIGH, NORTH CAROLINA
FACILITY ID # NCD 088 560 032



Photo 1. View of RCRA cap, facing south.



Photo 2. View of RCRA cap, facing north.

ATTACHMENT 2
Post-Closure Inspection Checklist
Former Underground Hazardous Waste Tank
Ashland Inc.
Raleigh, North Carolina

Inspector: Pat Stone

Date: 3/19/13

Signature: [Signature]

<u>Item</u>	<u>Condition</u>	<u>Maintenance Needs</u>	<u>Comments</u>
RCRA Concrete Cap	<u>Good</u>	<u>Remove Cinders ^{pl. mat} Extra Vegetation</u>	<u>TPO Damaged / Cleared Vegetation - Replaced Ender Blocks</u>
Run-on/off Control	<u>Good</u>	<u>N/A</u>	<u>N/A</u>
Surveyed Benchmarks	<u>Good</u>	<u>N/A</u>	<u>N/A</u>
Monitoring Wells	<u>Good ⁽¹⁾</u>	<u>See (1) Below</u>	<u>See (1) Below</u>
Site Security	<u>Good</u>	<u>N/A</u>	<u>Site Fenced + Guarded w/ Person w/ Sign</u>

Other Notes

(1) man door: wall had damaged. Temporarily
 Secured + Schedule for Replacement

