

Taber, Lisa

From: Taber, Lisa
Sent: Wednesday, December 12, 2012 1:49 PM
To: 'Berlin, Steve'
Cc: 'Nielsen, Don'; Nicholson, Bruce; Taber, Lisa; 'mbramblett@harthickman.com'
Subject: Natrional Textiles BF Project VI Issues

Dear Steve:

I am responding to your recent (November 15, 2012) letter concerning the chlorinated solvent vapor intrusion (VI) issues at the National Textiles (NT) brownfields property. I have copied Don Nielsen who is the attorney representing Ferguson Copeland (FC), the current owner/occupant of property, in this matter. In your letter, you relate that AES (radon contractor for NT) has concerns about the potential effectiveness of a subslab depressurization (SSD) system for VI mitigation. After they performing a cursory subslab communication test last April, AES concluded that the soil beneath the slab was too tight for a retrofitted SSD system and that an "alternative system" should be used. To date, I have am not aware of an alternative remedy having been proposed. I am, however, aware of SSD systems working successfully under similarly "non-ideal" soil conditions. I feel that a well designed pilot test (like that proposed by the radon specialist consulted by FC, which uses stronger suction and larger collection sumps) could yield more promising results. On the basis of the limited VI data collected to date, the concentrations need only be reduced by one to two orders of magnitude to bring chlorinated solvent concentrations inside the building to acceptable industrial levels. In fact, it is possible that the tight soil could work to our advantage given enough collection points, since the rate of soil gas diffusion will be slow, allowing more of the soil gas to be captured before it enters the building. Also, soil beneath a large slab can rapidly lose moisture when a steady vacuum is applied, which can increase air permeability and enhance vapor capture.

I have discussed the SSD pilot study proposal, obtained by FC from Shaw's Home Maintenance with FC's environmental consultant and I think that pilot test would give us much better information about the potential effectiveness of a SSD. I continue to believe that a well-designed SSD system focused in the area of the spill (with cracks in the floor and block walls effectively sealed) could be the most straightforward and cost-effective means of addressing the issues at this site. In addition to quite possibly being more effective, this approach may be less expensive than the previously contemplated permanent sealing the floor, filling in of the trench system, and bringing HVAC-conditioned air to the lower level for ventilation. It would also be cheaper than constructing an engineered vapor barrier and collection system and second floor above the current slab, which is an approach that has been successfully used at other brownfields sites. The proposed system (which spans a portion of the lower and upper levels as the grade changes and would consist of 20 to 25 collection points) can be implemented in the "Area of Potential Vapor Concern" for approximately \$70,000 to \$80,000, which seems a reasonable cost for such a retrofit VI system.

I also think it is important to perform another round of subslab and indoor air testing at the site to update our understanding of the issues and it makes sense to collect these samples prior to conducting the pilot test for the SSD system. In order to optimize our efforts, I am requesting that all plans for future testing related to the VI issues at the site be provided for my review prior to implementation.

Other objections you raise to pursuing a SSD system include the number of floor penetrations and collection points and piping, but contending with those practical issues would seem to fall on the property owner/occupant and they appear to be willing to accept the inconvenience in order to mitigate the VI issues and bring this matter to an end.

I can't speak to your claims about the use/past use of products containing PCE by FC because I have no knowledge of the basis for your statements, but it is my understanding from discussions with Don that an inventory of products has been conducted and that such products are not now being used by FC at the property. Even if PCE-containing products were used at the property in *de minimus* amounts they likely would have little to no effect on the

high concentrations of chlorinated solvent vapors measured at the site in subslab soil gas, which is clearly the result of the major solvent spill documented to have occurred at the facility.

Please give this some thought. I believe we all would like to move forward and find a permanent solution to the VI problem at the site. Bruce Nicholson and I would like to hold a meeting or a call to discuss this project at your earliest convenience, so please propose a time to discuss this matter.

Thank you, Steve. We look forward to speaking with you.

Sincerely,

Lisa Taber, PG
Project Manager, North Carolina Brownfields Program
Lisa.Taber@ncdenr.gov
<http://portal.ncdenr.org/web/wm/bf>

Please note my new contact information

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Taber, Lisa

From: Taber, Lisa
Sent: Wednesday, December 12, 2012 12:04 PM
To: 'Nielsen, Don'
Subject: RE: Proposed Reep Drive Dust System/Request for DENR approval

Don,

Thank you for informing us of the upcoming soil exposing activity at the National Textiles BF site. The activities you outline are approved. As always with construction at a BF site, please ensure that the field crew are briefed of the possibility, though remote at this site, of encountering contaminated soil and have them instructed to be vigilant for indications of such (e.g., soil staining or chemical odors).

Thanks again.

Lisa Taber, PG
Brownfields Project Manager

From: Nielsen, Don [<mailto:dnielsen@belldavisritt.com>]
Sent: Wednesday, December 12, 2012 10:57 AM
To: Taber, Lisa
Subject: Proposed Reep Drive Dust System/Request for DENR approval

Lisa, following up on my conversation with you on Monday, attached is a drawing showing a proposed dust filter system for woodworking equipment that Ferguson Copeland intends to install at the Reep Drive plant in Morganton. As shown on the drawing, the dust filtration system will be located outside of the building in a parking lot and is not designed for human occupancy. This system will be connected to the upper level via air ducts and will remove dust from woodworking machinery stations and return clean air to the plant. A concrete pad is necessary for the foundation of the filter system and will be 16'1" x 34' x 6". There will also be 4 concrete foundations for the dust filter steel supports, which will be 36" x 36" x 36". In addition, there will be a concrete pad for the fan systems that will be 22'5" x 33' x 10". Another concrete pad at the top of the bank, 4' x 4' x 10", will provide a foundation for the supports for the air ducts between the fans and the building. The attached "FC Reep Dr. Survey Plant.pdf" shows on the BFA survey plat where the proposed system will go in relation to the area of potential vapor concern (a significant distance). The dust filtration system is located on the opposite side of the site building from the groundwater plume and soil source area that were the subject of the BFA.

Per the BFA (see specifically paragraph 15.d.) we need DENR's approval for soil penetrations at the Property. My understanding is that the deepest penetration will be 36 inches for the pillars that will support the dust filters, and concrete pads will be less than a foot deep.

It is hoped that the equipment can be installed relatively quickly. Please respond by e-mail with your approval or any questions you may have. Thanks very much for your help,

Don



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