



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

November 18, 2011

Ms. Nicole Cory
Flint Hills Resources, LP
P.O. Box 2917
Wichita, Kansas 67201

Re: **Remedial Investigation Plan**
Koch North Terminal – Paraxylene Facility (formerly)
3325 River Rd.
Wilmington, New Hanover County, NC
NONCD0002797

Dear Ms. Cory:

I have completed my review of the Remedial Investigation Workplan (Plan) prepared for the subject site and submitted by Catlin Engineers and Scientists (Catlin) and received on July 27, 2011. The vapor intrusion investigation portion of the Plan is approved with the following comments:

1. Please note that the April 28, 2011 Remedial Investigation Request letter listed the wrong ID number. The ID number for this site is listed above.
2. There appears to be text missing between pages 1 and 2.
3. Section 2.2 of the Plan states that Invista's current Waste Management Plan provides a summary of hazardous waste management practices at the site. The Waste Management Plan is contained within Appendix B of the Plan. Please specify whether the current waste management practices are the same as previous waste management practices at the site.
4. Please note that this site will not receive a No Further Action designation until all contaminants are below their respective remedial goals. This includes xylene in groundwater which has a 2L standard of 500 µg/L.
5. Section 3.0 of the Plan states that based on previously submitted data; site soil contamination for the contaminants of concern is not present. A review of the historical documents for the site revealed that a number of historical soil samples contained xylenes at concentrations in excess of the Branch's remedial goals, including 401-13, 601-7, BH-19, MW-4, RW-1, S-1, S-5, S-8, S-9 and S-13. S-8 also contained methylene chloride above its applicable remedial goals. Soil samples should be taken in these areas to verify the current concentrations of contaminants in the soil. Additionally, several spill and soil excavation areas do not appear to have been adequately assessed for potential residual soil contamination. A plan to address these issues or information on where this can be found in the file should be submitted.

As stated in the Remedial Investigation Request letter dated April 28, 2011, Flint Hills Resources must notify the Division no less than ten (10) days prior to any field activity. Please submit a hard copy of the vapor intrusion Remedial Investigation Report by **February 20, 2012**. Please also provide a hard copy of the requested Soil Investigation Plan or information, as requested in comment 5, by **February 20, 2012**. In addition to the hard copies, please submit a copy of the reports in electronic PDF/A format with a minimum resolution of 300 dpi. If you have any questions, please contact me at (910) 796-7340.

Sincerely,



Genevieve M. Henderson, P.G.
Hydrogeologist
Division of Waste Management, Superfund Section
Inactive Hazardous Sites Branch

Cc: IHSB – WiRO files

Michael Christopher, Reiss Remediation, 12550 Trinity Blvd., Euless, TX 76040
Jeff Becken, Catlin Engineers and Scientists, 220 Old Dairy Rd., Wilmington, NC 28405
Devon Watts, Sunoco, Inc., 203 South Falkenburg Rd., Tampa, FL 33619
Scott Dunsmuir, EnviroTrac, 375 Winkler Dr., Ste. E., Alpharetta, GA 30004
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