



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

September 4, 2012

CERTIFIED MAIL

Return Receipt Requested

7010 0290 0003 0833 9366

Mr. Stephen B. Andrews
A&A Real Estate Services, Inc.
231 Fairfield Road
Reidsville, NC 27320

RE: VFW Road Contamination
Reidsville, Rockingham County, NC
NONCD0002894

Dear Mr. Andrews.:

In response to a citizen, the Division of Waste Management (the "Division") performed two sampling events of selected water supply wells (WSWs) on VFW Road in Reidsville, Rockingham County, NC. Several chemicals were detected during these sampling events including metals, pesticides, and chlorinated solvents. Of the compounds detected, dieldrin (pesticide) and iron (metal) exceeded the applicable standards in three of the WSWs sampled.

Review of Rockingham County Environmental Health and the Department of Environment and Natural Resources' Winston-Salem Regional Office files indicate that the following releases and/or suspected releases have occurred at 1001 NE Market Street, Reidsville, Rockingham County, NC (the "Site"):

- A June 30, 1997 Water Quality Complaint Investigation (NPDES Stormwater Permit NCG050242 and NPDES Permit NC0002828) addressed to you; indicates that two areas of concern were investigated. The first area involved the unloading area for pellets, which during rain events discharging onto James Flynt Jr. property. The second area of concern was an unknown discharge from a pipe at the rear of the plant. It was understood that pesticide used during the week previous to the inspection caused the discharge.
- A petroleum underground storage tank release was classified as High-Risk in 2002 and in 2006 was issued a "No Further Action" with a "Notice of Residual Petroleum". Tetrachloroethene (chlorinated solvent) was found at concentrations exceeding the UST's residential maximum soil contaminant concentrations. Review of the UST files indicates that several chlorinated solvents were detected in the soils within the UST excavation area and soil borings. Chlorinated solvents (tetrachloroethene exceeded the NC 2L Groundwater Standard) and metals were also detected in the groundwater. (Concentrations of 1,1 dichloroethane, tetrachloroethene, and chromium exceed the current NC 2L Groundwater Standard.)

- A September 20, 2010 response to a Freedom of Information Request indicated that in addition to the two items above, there were past notices of violation for State water compliance sampling inspections.

Based on the history of releases at 1001 NE Market Street, Reidsville, NC, the proximity to the contaminated WSWs, and the presence of the same/and or similar contaminants in the WSWs sampled along VFW Road, the Division considers the Site to be a high priority for assessment. In light of these facts, the Division requests that you conduct a remedial investigation under the supervision of the Inactive Hazardous Sites Branch. This remedial investigation shall include the soils, groundwater, surface water, and sediment at the Site. Within ninety (90) days of your receipt of this letter, please submit a draft Remedial Investigation Plan (Plan) that complies with the current *Inactive Hazardous Sites Branch Guidelines for Assessment and Cleanup* (<http://portal.ncdenr.org/web/wm/sf/sfavailabledocs>). The draft Plan must be organized in sections corresponding to the following items and include:

1. Site location information including site street address, longitude and latitude, and identification of owners and use of the site and all surrounding property.
2. A summary of all management practices employed at the Site for hazardous wastes and any wastes that may have contained hazardous substances, including a list of types and amounts of waste generated, treatment and storage methods, and ultimate disposition of wastes; a description of the facility's past and current RCRA status; the location and condition of any vessels currently or previously used to store any chemical products, hazardous substances or hazardous wastes; and a summary of the nature of all on-site contaminant releases, including one-time disposals or spills.
3. United States Geological Survey topographic maps sufficient to display topography within a one-mile radius of the Site.
4. A site map drawn to scale including scale; north arrow; and locations of property boundaries, buildings, structures, all perennial and non-perennial surface water features, drainage ditches, dense vegetation, known and suspected spill or disposal areas, sumps, storm water conduit, underground utilities, storage vessels, and existing on-site wells.
5. Inventory and map of all wells, springs, and surface-water intakes used as sources of water within one-half mile radius of the center of the Site. If the Site is greater than one hundred (100) acres in size, the inventory and map must cover a one-mile radius from the center of each source area.
6. Identification of environmentally sensitive areas on all properties constituting the Site and on all adjacent property to the Site including:

State Parks
Areas Important to Maintenance of Unique Natural Communities
Sensitive areas Identified Under the National Estuary Program
Designated State natural Areas
State Seashore, Lakeshore and River Recreational Areas
Rare Species (state and federal Threatened and Endangered)
Sensitive Aquatic Habitat
State Wild and Scenic Rivers
National Seashore, Lakeshore and River Recreational Areas

National Parks or Monuments
Federal Designated Scenic or Wild Rivers
Designated and Proposed Federal Wilderness and Natural Areas
National Preserves and Forests
Federal Land designated for the protection of Natural Ecosystems
State-Designated Areas for Protection or Maintenance of Aquatic Life
State Preserves and Forests
Terrestrial Areas Utilized for Breeding by Large or Dense Aggregations of Animals
National or State Wildlife Refuges
National and State Historical Sites
Areas Identified Under Coastal Protection Legislation
Coastal Barriers or Units of a Coastal Barrier Resources System
Spawning Areas Critical for the Maintenance of Fish/Shellfish Species within River, Lake or Coastal Tidal Waters
Migratory Pathways and Feeding Areas Critical for Maintenance of Anadromous Fish Species within River Reaches or Areas in Lakes or Coastal Tidal Waters in which such Fish Spend Extended Periods of Times
State Lands Designated for Wildlife or Game Management
Wetlands
Natural Areas Attracting Ecological Receptors
Areas of Stressed Vegetation

7. A chronological listing of all previous owners and each period of ownership since the Site was originally developed from pristine land.
8. Operational history with aerial photographs and Sanborne Fire Insurance maps to support land-use history.
9. Site environmental permit history, including all federal, state, and local environmental permits, past and present, issued to or within Superior Essex's custody or control. Superior Essex shall provide copies of any such permits upon request by the Division.
10. A summary of all previous and ongoing environmental investigations and environmental regulatory involvement with the Site, and copies of all associated reports and laboratory data.
11. Proposed procedures for characterizing site geologic and hydrogeologic conditions and identifying and delineating each contamination source as to each affected environmental medium, including any plan for special assessment such as a geophysical survey.
12. Proposed methods, locations, depths of, and justification for, all sample collection points for all media sampled, including monitoring well locations and anticipated screened intervals.
13. Proposed field and laboratory procedures for quality assurance/quality control.
14. Proposed analytical parameters and analytical methods for all samples.
15. A contact name, address and telephone number for the principal consultant and laboratory, and qualifications and certifications of all consultants, laboratories and contractors expected to perform work in relation to this Plan. Any laboratory retained must currently be either certified to analyze applicable certifiable parameters under Title 15A of the North Carolina Administrative Code, Subchapter 2H, Section .0800, or be a contract laboratory under the EPA Contract Laboratory Program.
16. Equipment and personnel decontamination procedures.

17. A proposed schedule for site activities and reporting.
18. Any other information considered relevant by the remediating party.
19. A signed and notarized certification by a company official with the express authority to bind the company stating: "I certify that, to the best of my knowledge, after thorough investigation, the information contained in or accompanying this certification is true, accurate, and complete."
20. A signed and notarized certification by the consultant responsible for the day to day remedial activities stating: "I certify that, to the best of my knowledge, after thorough investigation, the information contained in or accompanying this certification is true, accurate, and complete."
21. If the Plan includes any work that would constitute the "practice of engineering" as defined by N.C.G.S. § 89C, the signature and seal of a professional engineer is required. If the Plan includes any work that would constitute the "public practice of geology" as defined by N.C.G.S. § 89E, the signature and seal of a licensed geologist is required.

The Division will notify A&A Real Estate Services, Inc. of any changes needed in the Plan and of the time within which the changes must be made. A&A Real Estate Services, Inc. may not implement the Plan until it is approved in writing by the Division. Any desired modifications to the approved Plan or work schedule must be approved by the Division prior to implementation. Superior Essex must notify the Division no less than ten (10) days prior to any field activity.

Following completion of the remedial investigation, A&A Real Estate Services, Inc. must provide a Remedial Investigation Report (Report) documenting implementation of the approved Plan. The Report must be organized in sections corresponding to the following items and include:

1. A narrative description of how the remedial investigation was conducted, including a discussion of any variances from the approved Plan.
2. A description of groundwater monitoring well design and installation procedures, including well drilling methods used, completed drilling logs, "as built" drawings of all monitoring wells, well construction techniques and materials, geologic logs, and copies of all well installation permits.
3. A map, drawn to scale, showing all soil, surface water and sediment sample locations and monitoring well locations in relation to known disposal areas or other sources of contamination. Monitoring wells must be surveyed to a known benchmark. Soil sample locations must be surveyed to a known benchmark or flagged with a secure marker until after the remedial action is completed. Monitoring well locations and elevations must be surveyed by a Professional Land Surveyor.
4. A description of all laboratory quality assurance and quality control procedures followed during the remedial investigation.
5. A description of procedures used to manage drill cuttings, purge water and decontamination water.
6. A summary of site geologic conditions, including a description of soils and vadose zone characteristics.

7. A descriptions of site hydrogeologic conditions (if hazardous substances have been detected in groundwater), including current uses of groundwater, notable aquifer characteristics, a water table elevation contour map with groundwater flow patterns depicted, tabulated groundwater elevation data, and a description of procedures used for measuring water levels.
8. Tabulation of analytical results for all sampling (including sampling dates and soil sampling depths) and copies of all laboratory reports (including QA/QC support data referenced to specific samples).
9. Soil, groundwater, surface water and sediment contaminant delineation maps and cross sections, including scale and sampling points with contaminant concentrations.
10. A description of procedures and the results of any special assessments such as geophysical surveys, immunoassay testing (EPA SW-846 4000 series methods), soil gas surveys, or test pit excavations.
11. Copies of all field logs and notes, and, where available, color copies of site photographs.
12. A demonstration, supported by sampling data, that the areal and vertical extent of hazardous substance contamination in each affected medium has been delineated to the satisfaction of the Division in accordance with the current version of the Division's *Inactive Hazardous Sites Branch Guidelines for Assessment and Cleanup*.
13. If groundwater contamination exists at the Site, an inventory and map of all wells, springs, and surface-water intakes used as sources of water within on-half mile radius of the center of the Site. If the Site is greater than one hundred (100) acres in size, the inventory and map must cover a one-mile radius from the center of each source area.
14. Any other information considered relevant by the remediating party.
15. A signed and notarized certification by a company official with the express authority to bind the company stating: "I certify that, to the best of my knowledge, after thorough investigation, the information contained in or accompanying this certification is true, accurate, and complete."
16. A signed and notarized certification by the consultant responsible for the day to day remedial activities stating: "I certify that, to the best of my knowledge, after thorough investigation, the information contained in or accompanying this certification is true, accurate, and complete."
17. If the Plan includes any work that would constitute the "practice of engineering" as defined by N.C.G.S. § 89C, the signature and seal of a professional engineer is required. If the Plan includes any work that would constitute the "public practice of geology" as defined by N.C.G.S. § 89E, the signature and seal of a licensed geologist is required.

The Division will notify A&A Real Estate Services, Inc. of any changes needed in the remedial investigation or the Report due to any hazard posed by the Site or discrepancies with the approved Remedial Investigation Plan, and of the time within which changes must be made. When the Division determines that the remedial investigation is complete, the Division will notify A&A Real Estate Services, Inc. in writing.

All documents submitted to the Division in relation to this work must be provided in both hard copy and in an electronic format designated by the Division (currently electronic copies shall be submitted in PDF/A with a minimum resolution of 300 dpi) and sent to:

All documents submitted to the Division in relation to this work must be sent to:

Sue Robbins
Inactive Hazardous Sites Branch
Superfund Section
NC Division of Waste Management
127 Cardinal Drive Extension
Wilmington, NC 28405

To protect public health and the environment, the Division has the authority under N.C.G.S. 130A-310.1(c) to order any responsible party to conduct such monitoring, testing, analyses and reporting as deemed reasonable and necessary to ascertain the nature and extent of any hazard posed by a Site. However, prior to issuing site assessment orders, the Division sends letters such as this to offer responsible parties the opportunity to work cooperatively with the Division.

This offer shall expire at the close of business on the 30th day following your receipt of this letter, so please notify the Division, in writing, if A&A Real Estate Services, Inc. intends to comply with our request. If you have any questions, concerning this assessment request, please contact me at (910) 796-7411.

Sincerely,



Sue Robbins
Hydrogeologist
Inactive Hazardous Sites Branch
Superfund Section

cc: Leon S. Niegelsky, NIAM Partnership, 1870 Pennrose Drive, Reidsville, NC 27320
Bob Jones, Rockingham County Department of Public Health
Mike Rogers, UST Section – WSRO
Collin Day, IHSB – Western Region - WSRO
Corey Basinger, Surface Water - WSRO
IHSB WiRO Files