

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Stephen B. Andrews
 AAA Real Estate Sucs.
 231 Fairfield Rd.
 Reidsville, NC
 27320

2. Article Number
 (Transfer from service label)

7010 0290 0003 0833 9366

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Kim Anderson Addressee

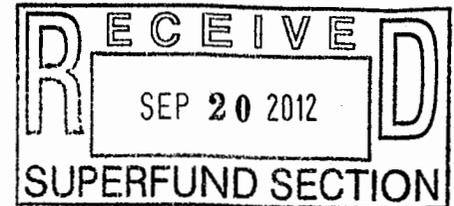
B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
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3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

A & A Real Estate Services, Inc.
231 Fairfield Rd.
Reidsville, North Carolina 27320



Sept. 15, 2012

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

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

Dear Ms. Robbins:

I am in receipt of your letter Dated Sept. 4, 2012, requesting a Remedial Action Plan at our site on 1001 NE Market St., Reidsville, NC. This letter is in response to the assumptions made in your letter.

1. No business activity has occurred at the site since Dec. 2009 when the current tenant ceased operation.
2. To my knowledge, neither Dieldrin nor iron based substances have been used on the site since it's inception in 1960 as a manufacturing site.
3. The event you reference in your letter in June 1997 involved a weed killer, not an insecticide. I am enclosing my letter to Mr. Steve Mauney, Water Quality Supervisor in the Winston -Salem office at the time, along with the report from Cooper Environmental, stating the chemical composition of the weed killer and the absence of environmental risks.
4. The testing and remediation performed on the site from 1992-2006 for the UST never identified the presence of the substances you mentioned. As stated above, they have not been used since that testing was performed and a No Further Action Letter was received from the State.
5. The other items you reference were related to the on-site sewage treatment facility and were related to maintaining proper chemical balance. These resulting in very minor fines.

After re-examining our records of the events you have referenced, I see no basis for any further work to be done on our site as there is no apparent correlation between what was found in the WSWs and what has taken place on our site.

We do not intend to perform any additional work, unless we hear from you in writing.
We are not trying to be uncooperative in any way, but do not see a basis for the work you
have suggested.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen B. Andrews", with a long horizontal flourish extending to the right.

Stephen B. Andrews

President and CEO

A & A Real Estate Services, Inc.

Steve

66 F 386 J



July 15, 1997

Mr. Steve Mauney
Water Quality Supervisor
State of North Carolina
Department of Environment, Health, and Natural Resources
Winston-Salem Regional Office
585 Waughtown Street
Winston-Salem, NC 27107-2241

**Re: Response to Water Quality Complaint Investigation
ZARN, Inc.
NPDES Stormwater Permit NCG50242
NPDES Permit NC0002828
Rockingham County**

Dear Mr. Mauney:

On June 20, 1997 Mr. Jerry Eplin, P.E., of Cooper Environmental visited the ZARN site in Reidsville, NC for the purpose of investigating an unusual stormwater discharge from the ZARN property. This unusual discharge was brought to the attention of ZARN personnel by Mr. Jim Flynt, owner of the property adjoining ZARN. Mr. Flynt had noticed a "petroleum-like" discharge from a stormwater outfall discharging near his property on or about June 5; Mr. Flynt reported the discharge to ZARN personnel on June 17. Upon receipt of this report, ZARN contracted with Cooper Environmental to test the discharge and ZARN personnel began to search for the source of the discharge. ZARN took this action prior to the investigation conducted by NCDEHNR.

During our search for the source of the discharge, we determined that maintenance personnel had used a petroleum-based herbicide on or about the date that Mr. Flynt first noticed the discharge. This herbicide was used in the area of drains leading to the above mentioned stormwater drain. The discharge and the herbicide fluid are similar in appearance and smell. Our investigation pointed to no other possible sources either on or off site. Therefore, we were led to believe that the unusual discharge fluid from the stormdrain was, in fact, the herbicide previously used. Mr. Eplin obtained the content information of the herbicide and performed tests that he deemed necessary to identify the fluid in the discharge. Cooper Environmental and Mr. Eplin concluded, as a result of the

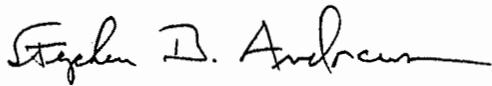
analytical tests, "...that the yellowish fluid and oily sheens observed in the catch basin and storm outfall were most likely storm water containing residual quantities of the weed killer used at the plant." CEI believes that there is no evidence of an environmental concern based on the results of the analytical tests performed. Accordingly, CEI recommends no additional testing or sampling at the site; however, visual monitoring of the site is recommended periodically to determine if the discharge dissipates.

ZARN, Inc. has removed the herbicide from the premises; it will no longer be used. We will continue to monitor the stormwater visually to determine if any unusual discharges continue. If we detect any unusual discharges during these visual inspections, we will conduct analytical tests to determine the nature of the discharge. We believe that the removal of the herbicide will eliminate the source of the "petroleum-like" discharge and, once the residual quantities are eliminated in the system, the discharge will cease.

If you have any further requests or questions related to this matter please feel free to call me at my direct telephone number at ZARN, 910-342-8841

Sincerely,

ZARN, INC.



Stephen B. Andrews
Vice President, Finance & CFO

cc: Henri Steffens, ZARN, Inc.
Greg Thompson, ZARN, Inc.
Chris Loeb, Robinson Bradshaw, & Hinson

 COOPER ENVIRONMENTAL
ENGINEERS • GEOLOGISTS • SCIENTISTS

July 15, 1997

ZARN, Inc.
c/o Christopher Loeb, Esq.
Robinson, Bradshaw & Hinson, P.A.
1900 Independence Center
101 North Tryon Street
Charlotte, North Carolina 28246

Re: Report of Sampling of Storm Water Fluid
ZARN, Inc.
Reidsville, North Carolina
CEI Project No. P97151

Dear Mr. Loeb:

Copper Environmental, Inc. (CEI) is pleased to provide ZARN, Inc. (ZARN) with the following summary of sampling activities for the referenced site.

On June 20, 1997 Mr. Jerry Eplin, P.E. of CEI visited the ZARN site in Reidsville, North Carolina. Mr. Eplin met Mr. Greg Thompson of ZARN at the site. Mr. Thompson explained that the stormwater outfall location was of some concern because they had recently found some plastic pellets and observed staining in the area of the outfall. Mr. Thompson took Mr. Eplin to the outfall, which was observed to be an approximately 3 foot diameter corrugated pipe. Mr. Eplin observed no staining at the time of the site visit other than a high water mark. However, there was a slight oily sheen on the water and a yellow oily material was present on the stagnant water near the outfall. A sample of the outfall discharge was obtained and placed in an ice-filled cooler. This sample was designated as D-1.

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Mr. Thompson then took Mr. Eplin to view catch basins and manholes upgradient of the stormwater outfall. One of the catch basins had been previously observed by ZARN to contain a slight sheen of oily material. Stressed vegetation was observed in the vicinity of one of the catch basins. Mr. Eplin and Mr. Thompson agreed to expand the scope of work and obtain a sample of water within one of the catch basins. This sample was designated as MH-1.

During the site visit CEI was informed that ZARN had sprayed a herbicide weed killer prior to discovery of the yellowish fluid in the storm outfall. CEI viewed the drum of weed killer and noted the material was yellowish in color and had a medicinal odor. These characteristics are similar to what was observed in the fluid samples obtained by CEI. The drum listed the following ingredients:

Isoctyl 2,4-dichlorophenoxy acetate	1.09%
5-bromo-3-sec-butyl-6-methycuracil	0.61%
Aliphatic petroleum hydrocarbons	96.0%
Inert ingredients	<=3%

CEI delivered both samples to Pace Analytical for analysis for volatile and semi-volatile compounds by EPA Methods 8260 and 8270, respectively. CEI consulted with the laboratory prior to the requesting the above analyses and determined that these would be appropriate. CEI was informed that aliphatic hydrocarbons of the type in the herbicide could not be quantified by standard techniques, however, the requested analyses could provide evidence as to their presence or absence. Based on CEI's understanding of ZARN's storm water permit, presence of these substances is not an environmental concern, but would explain the oily sheens observed at the site.

The laboratory results are attached. No target compounds were detected above laboratory detection limits in either sample. Sample MH-1, sampled

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from the catch basin had slightly elevated detection limits due to the presence of non-targeted compounds.

CEI suspects that these non-targeted compounds are likely the aliphatic hydrocarbons present in the herbicide. On this basis, the results do not evidence an environmental concern.

CEI believes that the yellowish fluid and oily sheens observed in the catch basin and storm outfall were most likely storm water containing residual quantities of the weed killer used at the plant. CEI recommends visual observation of the outfall on periodic basis to determine if the yellowish color dissipates during periods when the weed killer has not been used, but does not recommend further sampling or other investigations.

CEI appreciates the opportunity to assist ZARN in this matter. If you have questions, please feel free to contact me at (704) 845-2000.

Sincerely,

COOPER ENVIRONMENTAL, INC.



Michael S. Crouch, P.G.
Senior Hydrogeologist