



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

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Governor

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Secretary

March 5, 2013

Sent Via E-mail and USPS

Mr. Hang Lae Cho
560 Oak Crest Drive
Chapel Hill, NC 27516
hlcho501@gmail.com

Subject: Additional Assessment Requirements
Southern States Cooperative Site
6601 Ward Boulevard
Wilson, Wilson County 27893
Brownfields Project Number 16029-12-098

Dear Mr. Cho:

On August 27, 2012, the North Carolina Department of Environment & Natural Resources (DENR) Brownfields Program determined that the former Southern States Cooperatives site in Wilson was eligible for the NC Brownfields Program. As outlined in the eligibility letter, the next step is to determine whether additional assessment is needed to determine how the site can be made safe for its intended reuse.

According to your Brownfield application the reuse is planned as a small to medium sized recycling center that will be engaged in buying paper, white goods, electronic scraps, and nonferrous and ferrous scrap materials with a potential long term goal of including automotive batteries in developing an export market. We understand that you were granted a Special Use Permit from the Wilson Planning & Development Services in September 2012 permitting use of this site for recycling purposes.

A review of the historical information included in the report submitted with your application indicates that potential sources of contamination exist at the site from both onsite and offsite historical uses. The site was historically used for the storage of raw fertilizer components such as potash and nitrates, and the manufacture of pesticide and/or fertilizer compounds from 1955 to about 2006. The Farmers Cooperative Exchange (later known as FCX) operated at the site from 1955 to 1986. The Southern States Cooperative operated at the facility from 1986 to 2006.

Except for the use of potash and nitrogen at the facility, the specific types of chemicals manufactured or handled at the subject brownfield property in Wilson since 1956 by FCX and then Southern States are unknown. This constitutes an assessment data gap at the property. To evaluate the potential compounds handled at the Wilson site by FCX, DENR reviewed data collected at the former FCX site in Statesville, NC, which is a federal Superfund site. These data indicate that FCX manufactured and distributed a number of pesticides including DDD, DDE, DDT, chlordane, endrin, BHC and other compounds at their Statesville

facility during the 1950s and 1960s, some of which was reportedly discharged to the subsurface through trenches below the concrete foundation of the warehouse building. DENR believes it would be prudent to investigate whether the same compounds were mixed, stored, and distributed at the Wilson site and whether the same disposal practices were also implemented there.

Petroleum hydrocarbons are known to have been released at the site due to past subsurface investigations and remedial reporting. Potential sources of petroleum hydrocarbons at the site are due to the former presence of onsite bulk above ground storage tanks (ASTs), underground storage tanks (USTs) which were removed from the site in 1989, and a fuel dispensing system. There was also a documented release from a 550-gallon heating oil UST in the northeastern area of the site. The removal of approximately 1,364 tons of petroleum hydrocarbon contaminated soil took place in 1998 in the former onsite loading rack and dispenser pump area.

Potential offsite sources contamination to the property include the former suspected operation of a gasoline service station to the north of the site and a historical chemical mixing operation (compounds unknown) also located north of the site.

While the petroleum hydrocarbon releases have been assessed, an assessment of potential onsite pesticide and fertilizer contamination, and contamination from offsite sources has not been performed. Additional information and assessment activities, as outlined below, are required to assist in making risk management decisions for inclusion in the brownfields agreement. After reviewing the available site documents, the following items need to be addressed to determine that the site is or can be made safe for its intended reuse:

Assessment Data Gaps

- Complete a Brownfields Receptor Survey to evaluate whether environmental receptors may be impacted by potential releases at the property. A copy of the form is attached for your use.
- Conduct additional historical review of the early pesticide/fertilizer operations at the facility in light of the information identified at the FCX site in Statesville, NC.
- Assess shallow soil and groundwater for the presence of volatile organic compounds (VOCs), pesticides, fertilizers, metals and other chemical compounds from onsite and offsite sources. Include a contingency for addressing vapor intrusion if initial data exceeds applicable screening levels for volatile organic compounds (VOCs).

Other work to be performed at the site includes properly characterizing, removing and disposing of identified materials or waste products from the site (three 55-gallon drums of herbicides and one 100-gallon tank of unknown contents) identified in the Phase I ESA report (Mid-Atlantic Associates, July 25, 2012). Please provide documentation to the DENR Brownfields program as to the final disposition of these materials, such as manifest forms or bills of lading.

Please submit, for DENR review and approval, a sampling plan to address the potential impact to environmental media from the potential sources identified above. The data generated will be used to determine if environmental media has been impacted historically with contaminants of concern above levels that would make it unsafe for its proposed reuse, and if so, which mitigation methods may be necessary to make it safe.

Laboratory Analyses

Environmental samples must be submitted to a NC-certified laboratory for analyses using EPA SW-846 or Standard Methods under chain of custody protocol. Choose the methods that detect the potential constituents

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of concern and have detection limits below applicable standards. At a minimum, analyze shallow soil and groundwater using these methods: VOCs (EPA Method 8260); organochlorine pesticides and other semi-volatile organic compounds (SVOCs) (EPA Method 8270); organophosphate pesticides (EPA Method 8141B); the 13 priority pollutant metals (silver, arsenic, beryllium, cadmium, chromium, copper, mercury, nickel, lead, antimony, selenium, thallium, & zinc); nitrates; and phosphorus, as well as any other suspected site-specific contaminants not included in the above analytical methods.

Report and Figures

Submit an electronic copy of the assessment report with a description of field activities, tabulated data, laboratory data packet, and summary of results. The report should include a map that is an accurate drawing of the site indicating sampling locations, estimated locations of any previous samples and current site structures. Provide concentration map(s) for contaminants detected above applicable standards for all affected media.

Redevelopment Plan

Because risk management decisions may vary depending on the nature of the redevelopment, it will be important that DENR review the locations of the various elements. Please forward any maps or drawings, including grading plans, you may presently have indicating these details, even if only preliminary or conceptual.

Schedule

Inform DENR on the activities and progress of any building dismantling and demolition that will occur as part of site redevelopment. Be aware that during dismantling any and all chemicals, wastes, demolition debris and contaminated media must be managed in accordance with all applicable laws and guidelines. Please work closely with me on any activities associated with the site. I want to remind you that you are not afforded the protections of the Brownfields Agreement until the Brownfields documents are finalized, signed, and recorded at the county register of deeds office. If you operate at the site prior to this time, you may jeopardize your eligibility as a Prospective Developer.

I am optimistic that this phase of assessment will close the remaining data gaps so we can determine the risk this site may pose to receptors. I look forward to working with you to advance this work toward redevelopment. If you have any questions regarding this letter or the brownfields process, please feel free to contact me at 919.707.8379 or by email at sharon.eckard@ncdenr.gov.

Thanks,



Sharon Poissant Eckard, PG
Brownfields Project Manager
Division of Waste Management

Attachment: Brownfield Receptor Survey Form

cc: Project File
ec: Bruce Nicholson, DENR
Dan Nielson, Mid-Atlantic Associates