



April 11, 2016

Ms. Dianne Thomas
North Carolina Department of Environmental Quality
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Re: Quarterly Progress Report – January 2016 through March 2016
Flint Ink (Former Sinclair & Valentine Site)
515 South Turner Avenue
Charlotte, North Carolina
Site ID No. NCD 083 678 631
AECOM Project No. 60408261

Dear Ms. Thomas:

This quarterly progress report has been prepared by AECOM Technical Services of North Carolina, Inc. (AECOM), to document progress at the former Flint Ink (Former Sinclair & Valentine Site) facility formerly located at 515 South Turner Avenue (Site) in Charlotte, North Carolina during the period of January through March 2016. This quarterly report meets the requirements set forth in Section II B of the Administrative Agreement entered into by Flint Ink Corporation (now Flint Group US LLC) and North Carolina Department of Environmental Quality (NCDEQ) on November 3, 2004.

Soil

No further work is required in the Former Drainage Ditch A, Former Compactor or Former Dry Well areas. AECOM submitted a *Soil Remedial Action Completion Report* documenting closure activities for these areas to NCDEQ on October 9, 2014.

Remedial action activities performed in the Former Drainage Ditch B area could not be fully completed as part of the excavation activities documented in the *Soil Remedial Action Completion Report* dated October 9, 2014, due to the unforeseen presence of affected soils extending beneath the existing building. As documented in **Appendix F** of the *REC Program Implementation Guidance (Guidance)*, October 2015, leaving soil contaminants in place above the unrestricted use remediation goals with land use restrictions (LUR) requires written NCDEQ concurrence.

To obtain NCDEQ concurrence, a *Containment Remedy Notification Letter (Letter)* for remaining affected soils in the Former Drainage Ditch B area was submitted to NCDEQ on January 9, 2015. Following the January 9, 2015 submittal, numerous conversations took place throughout 2015 between AECOM, NCDEQ and the property owner specific to where LURs would be required at the Site.

AECOM Technical Services of North Carolina, Inc.
6000 Fairview Road, Suite 200
Charlotte, North Carolina 28210
(704) 522-0330 Phone
(704) 522-0063 Fax

As part of completing the LUR process within the Former Drainage Ditch B area, the following activities were completed from January 1, 2016 through March 31, 2016:

- Submitted a draft *Notice of Inactive Hazardous Substance of Waste Disposal Site* (Notice) in the form of a survey plat to NCDEQ for their review on January 25, 2016.
 - The notice was reviewed by NCDEQ and edits were returned to AECOM on February 23, 2016.
 - The finalized unsigned *Notice* will be included with the Soil Remedial Action Plan Addendum for Former Drainage Ditch B (*Addendum*).
- AECOM received concurrence from the NCDEQ for the proposed containment remedy in Former Drainage Ditch B on February 26, 2016. The concurrence was received from NCDEQ via an electronic correspondence.

In accordance with **Appendix F** of the *Guidance*, AECOM is assembling the draft *Addendum* for members of Flint Ink Corporation to review. The *Addendum* will include the following:

- Electronic correspondence dated February 26, 2016, from NCDEQ concurring with proposed containment remedy;
- Finalized unsigned Declaration of Perpetual Land Use Restrictions;
- Finalized unsigned *Notice*; and,
- Disposal manifests and photos from excavations completed in the Former Drainage Ditch B on July 21, 2009 and September 26, 2012.

Groundwater

Changes by the North Carolina Environmental Management Commission raised the 2L groundwater standard for 1,1 DCE to 350 ug/l which is above concentrations of 1,1 DCE historically detected at the Site. However, the Federal Drinking Water MCL remains 7 ug/l, and concentrations of 1,1 DCE at the Site are above this value. Based on discussions with Mr. Kim Caulk via telephone on December 20, 2013, and in February 2014, the MCL would only be relevant in the event a private or public drinking water well is threatened or impacted in accordance with Applicable or Relevant and Appropriate Requirements (ARARS) for the Site.

AECOM completed the following activities to support that no public drinking water well(s) are, or will be threatened or impacted:

- Performed a water well survey for wells within 1,000 foot radius of the Site.
- Confirmed groundwater impacts at the Site are known within State and local governing body databases; and,
- Confirmed local ordinances are in place that prevent the installation of a WSW in an area with known groundwater impacts.

The above activities completed by AECOM will be documented in the *Groundwater Remedial Action Plan Addendum* for the Site. AECOM plans to submit the *Groundwater Remedial Action*



Ms. Dianne Thomas
April 11, 2016
Page 3

Plan Addendum concurrent with the submittal of the *Soil Remedial Action Plan Addendum* to facilitate completion of the 30-day public notice requirements simultaneously.

-oOo-

The required certifications by the remediating party and the REC are attached. Please call me at (704) 522-0330 or Jeff Adamson of the Flint Group at (905) 761-3120 with any questions.

Sincerely,

AECOM TECHNICAL SERVICES OF NORTH CAROLINA, INC.

A handwritten signature in blue ink, appearing to read 'R. MacWilliams', with a long horizontal line extending to the right.

Robert H. MacWilliams, PG
Registered Site Manager

Attachments

cc: Jeff Adamson-Flint Group
Project File (hard copy)

IHSB SITE NAME Flint Group US LLC - Former Sinclair and Valentine Site (NCD083 6778 6311)

DATE & NAME OF DOCUMENT 4/11/2016; Quarterly Update Report, 1st quarter 2016

TYPE OF SUBMITTAL (circle all that apply): Report, Work plan, Work Phase Comp. Statement, Schedule Change

REMEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(B)(2))

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Flint Group US LLC
Name of Remediating Party

Rony S Muawad
Signature of Remediating Party

4/14/2016
Date

NOTARIZATION

Michigan (Enter State)

Wayne COUNTY

I, Maureen A. Bracey, a Notary Public of Macomb County and State, do hereby certify that Ronny S. Muawad did personally appear and sign before me this day, produced proper identification in the form of Driver's license, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

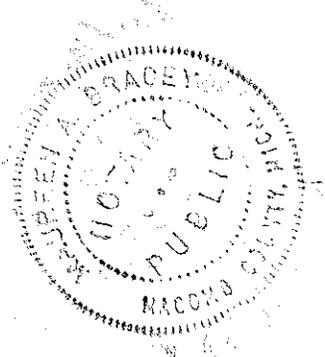
WITNESS my hand and official seal this 14 day of April, 2016.

Maureen A. Bracey
Notary Public (signature)

(OFFICIAL SEAL)

My commission expires: 2/20/20

Maureen A. Bracey
Notary Public, Macomb County
State of Michigan
Acting in Wayne County
My commission expires Feb 20, 2020



IHSB SITE NAME Flint Group US LLC Former Swickerton & Vickers Site
DATE & NAME OF DOCUMENT 4/15/2016 Quality Update Report
TYPE OF SUBMITTAL (circle all that apply) Report Work plan, Work Phase Comp. Statement, Schedule Change

REGISTERED SITE MANAGER CERTIFICATION OF SIGNATURES

As the Registered Environmental Consultant for the Site for which this filing is made, I certify that the signatures included herewith are genuine and authentic original handwritten signatures and/or true, accurate, and complete copies of the genuine and authentic original handwritten signatures of the persons who purport to sign for this filing. I further certify that I have collected through reliable means the originals and/or copies of said signatures from the persons authorized to sign for this filing who, in fact, signed the originals thereof. Those persons and I understand and agree that any copies of signatures have the same legally binding effect as original handwritten signatures, and I certify that any person for whom I am submitting a copy of their signature has provided me with their express consent to submit said copy. Additionally, I certify that I am authorized to attest to the genuineness and authenticity of the signatures, both originals and any copies, being submitted herewith and that by signing below, I do in fact attest to the genuineness and authenticity of all the signatures, both originals and copies, being submitted for this filing.

Robert MacWilliams
Name of Registered Site Manager

[Signature]
Signature of Registered Site Manager

4/15/2016
Date

REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1))

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act N.C.G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Robert MacWilliams
Name of Registered Site Manager

[Signature]
Signature of Registered Site Manager

4/15/2016
Date

NOTARIZATION

NORTH CAROLINA (Enter State)

MECKLENBURG COUNTY

I, YOLANDA K BELL, a Notary Public of said County and State, do hereby certify that ROBERT MACWILLIAMS did personally appear and sign before me this day, produced proper identification in the form of DRIVERS LICENSE, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certifications is true and accurate, and he or she then signed these Certifications in my presence.

WITNESS my hand and official seal this 15TH day of April 2016.

Yolanda K Bell
Notary Public (signature)

My commission expires: 11/25/17.

