

February 17, 2006

Mr. Will Hart  
North Carolina Department of Environment  
and Natural Resources  
Aquifer Protection Section  
943 Washington Square Mall  
Washington, North Carolina 27889

Re: Assessment Plan  
Belhaven Lots - Former Bulk Plant  
Belhaven, Bertie County  
APS Incident #: 87655

Dear Mr. Hart:

The purpose of this correspondence is to inform you that Eastern Fuels, Inc. (Eastern) intends to comply with the requirements outlined in the Notice of Violation for the above referenced site from the NCDENR dated February 10, 2006, and to provide a brief summary of the proposed assessment activities intended to achieve compliance. According to information provided by Eastern, a petroleum bulk storage and distribution facility consisting of ASTs and one or more loading racks was located at the site. However, no information regarding the size or contents of the ASTs or the precise location of the AST system is available.

On January 26, 2006, one Type II monitoring well was installed in the vicinity of temporary monitoring well TMW-1. A ground water sample was collected from the well and submitted for analyses for VOCs using EPA Methods 601/602, for SVOCs using EPA Method 625, for EDB using EPA Method 504.1 and for lead using Method 6010B. Concentrations of benzene (6.8 µg/l), naphthalene (35 µg/l) and lead (57 µg/l) that exceeded the maximum allowable concentrations (MACs) concentrations specified in T15A NCAC 2L.0202 or interim standards were reported in the sample. No detectable concentrations of EPA Method 601, 504.1 or 625 constituents other than naphthalene were reported in the sample.

In order to assess the horizontal extent of ground water contamination, three additional Type II monitoring wells (MW-2 through MW-4) will be installed, one up-gradient and two down-gradient of MW-1, which is presumably located in the source area. Ground water samples from the wells will be analyzed for VOCs using EPA Methods 601/602 and for lead using Method 6010B. In addition, since the precise locations of potential source areas are not known, laboratory analyses will be performed on the samples for SVOCs using EPA Method 625 and for EDB using EPA Method 504.1, even though none of these method constituents were present in MW-1. A sample will also be collected from the ditch located approximately 20 feet down-gradient from MW-1 and analyzed using the methodologies referenced above.

Due to the relatively low contaminant concentrations in MW-1, it should not be necessary to install more than four Type II monitoring wells. However, if the horizontal extent of contamination has not been defined, ground water screening will be performed by installing temporary 1-inch monitoring wells. Ground water screening of the samples collected from the temporary wells will be performed for BTEX constituents, MTBE and naphthalene using EPA Method 602. Once the horizontal extent of ground water contamination has

been defined, additional Type II monitoring wells will be installed at the perimeter of the plume to monitor potential migration and in the interior to obtain additional information on contaminant distribution within the plume. The number and locations of the permanent wells will be determined based on the screening results from the temporary wells. Once MW-1 is confirmed as the "worst case" monitoring well at the site, one Type III monitoring well will be installed in the source area to determine the vertical extent of ground water contamination.

If the installation of temporary monitoring wells is necessary, or if substantial time elapses between the initial sampling events and completion of the assessment activities, a comprehensive sampling event will be conducted. If no detectable concentrations of EPA Method 601, 504.1 or 625 constituents are reported in the ground water samples collected from MW-2 through MW-4, samples from any additional monitoring wells will be analyzed for VOCs and naphthalene using EPA Method 602 and for lead using Method 6010B. The top of casing elevation of each of the monitoring wells will be surveyed relative to an assumed datum of 100.00 feet. In addition, slug tests will be performed on three Type II monitoring wells to determine saturated hydraulic conductivity, and sieve/hygrometer analysis will be performed on a saturated soil sample to estimate effective porosity. This data will be used to calculate the horizontal seepage velocity. A receptor survey to identify any potential receptors or exposure pathways in the area will also be performed. Once all of the data has been reviewed, a Comprehensive Site Assessment Report will be prepared and submitted to the NCDENR.

The depth to ground water in MW-1 during the January 2006 sampling event was 1.27 feet. Based on this information, it appears that the influence of ground water, including the capillary fringe, extends to or near the ground surface. Therefore, any contaminants present in soil samples collected at even shallow depths would be more representative of ground water quality than of soil quality in the unsaturated zone. However, one "unsaturated" soil sample will be collected from the vicinity of MW-1 and submitted for analyses for gasoline- and diesel-range TPH using Method 8015. The sample will be collected at a depth of no greater than 6 inches to account for the affects of the capillary fringe. Based on the results of analyses, a determination will be made as to whether additional soil sampling or contaminant specific analyses are necessary.

A Site Location Map, a Site Map and the laboratory results from the January 2006 ground water sampling event have been attached. All field activities are tentatively scheduled to be completed before the end of March 2006. Please do not hesitate to contact the undersigned at (704) 845-4010 if you have any questions or require additional information.

Sincerely,  
Geological Resources, Inc.

Laura J. Mann  
Project Manager

John F. Hess, Jr., P.G.  
Senior Geologist

enclosures

cc: Eastern Fuels, Inc.  
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