



March 28, 2011

NCDENR, Division of Waste Management
Brownfields Program
401 Oberlin Road
Raleigh, NC 27605

Attention: Dr. Joe Ghiold
Project Manager

email: joe.ghiold@ncdenr.gov

Reference: Proposed Soil and Surface Water Sampling
5.5-Acre Erwin Square/Former Burlington Industries Site
2109 Hillsborough Road
Durham, North Carolina
Developer: Crescent Erwin Venture I, LLC
S&ME Project No. 1054-10-288A

Dear Dr. Ghiold:

Crescent Erwin Venture I, LLC, has submitted an application to the Brownfields Section under the Redevelopment Now program to redevelop an approximate 5.5-acre central portion of a 14.272-acre parent property located at 2109 Hillsborough Road in Durham, North Carolina. S&ME, Inc. (S&ME) has been authorized by Crescent Erwin Venture I, LLC, to perform shallow soil and surface water sampling services at the site, and requested that we provide our proposed sample locations and analyses to you for your review and input.

S&ME previously completed a Phase I Environmental Site Assessment (ESA), dated October 7, 2010, for the above-referenced property located in Durham, North Carolina. In summary, the Phase I ESA identified three *recognized environmental conditions* in connection with the subject property:

1. The subject property was formerly a central portion of the former Burlington Industries, Inc. Durham Plant No. 0183 facility, and was developed with several past industrial textile mill buildings and portions of buildings over time. There is the potential for soil and groundwater contamination from the historical industrial uses of the site. Based on the identified features and historical uses of the site, potential contaminants include petroleum constituents, chlorinated solvents, metals and polychlorinated biphenols (PCBs).
2. The parent property, Burlington Industries – Durham Plant (Facility ID No. 0-016153), is listed as a registered UST facility. Based on the UST information provided in the EDR report, three registered USTs have been permanently closed at

the site. Due to conflicting closure dates and sizes of these USTs, it is unclear whether they correspond to those identified in the LUST/IMD incidents.

3. An incident at Burlington Industries (LUST/IMD Incident No. 20604) was identified associated with the First Union Plaza site (now Wachovia), located adjacent to the southwest of the subject property. A chlorinated compound groundwater contaminant plume extends from the Wachovia property onto the southern and western portions of the subject property. This incident was transferred to the NCDENR Inactive Hazardous Sites Branch in 2007 and has not been closed out.

The Burlington Industries structures formerly located on the subject property have been demolished, and the site is currently a maintained lawn area with some remnant foundation slabs. Please see the full Phase I ESA report for additional details regarding the past uses of the subject property and the identified *recognized environmental conditions*.

We understand that Crescent Erwin Venture I, LLC is planning to redevelop the subject property with a multi-story residential development and a parking deck. Mr. Benjamin Collins with Crescent Erwin Venture I, LLC, the proposed Developer and Brownfields applicant, has indicated that based on the presence of the known groundwater contaminant plume, the proposed structures will be constructed with a means of preventing vapor migration, such as a vapor barrier. Based on groundwater elevation data provided in the previous LUST/IMD incident files, the depth to groundwater ranges from approximately 6.5 feet below the ground surface (bgs) to 11.5 feet bgs. Significant excavation into the groundwater table is not anticipated for the proposed development at this time. Therefore, additional assessment of groundwater does not appear to be necessary, contingent upon providing a means of preventing vapor migration into the proposed structures.

As such, S&ME proposes to perform shallow soil sampling at specific areas of concern and collect surface water samples from two seep areas.

Proposed Shallow Soil & Seep Water Sampling Program

Please refer to the attached **Figure 1, Proposed Sample Location Map**, which presents the areas of concern and proposed sampling locations as an overlay of the former Burlington Industries facility as shown on a March 3, 1977 aerial photograph. Refer to the tables below for summaries of the soil and seep water sampling plan and the proposed soil and seep water sample analyses. Sample ID numbers below correlate to the areas of concern shown on **Figure 1**.

Proposed Shallow Soil & Seep Water Sampling Plan

AOC	Matrix	Depth (ft-bgs)	Area of Concern	Purpose
1	SS	1 to 3 or 3 to 5	Coal storage/cooling tower/transformer	Evaluate shallow soil quality
2	SS		Engine house	
3	SS		Drum storage area with apparent staining	
4	SS		Drum storage area with apparent staining	
5	SS		Machine shop	
6	SS		Railroad siding	
7	SS		A/C and electrical shop	
8	SS		Electrical shop	
9	SS		Garage	
10	SW	N/A	Northern portion of swale	Water quality of existing seep
11	SW	N/A	Southern portion of swale	
SS = Soil Sample SW = Surface Water Sample				

Soil & Seep Water Sample Analysis Summary Table

Parameter	Analytical Method	Number of Samples
Soil Samples		
Volatile Organic Compounds + 10 TICs	EPA Method 8260B	9
Semi-Volatile Organic Compounds + 10 TICs	EPA Method 8270C	9
8 RCRA Metals	EPA Method 6010/7470	9
PCBs	EPA Method 8082	2
Seep Water Samples		
Volatile Organic Compounds + 10 TICs	EPA Method 6200B	2
Semi-Volatile Organic Compounds + 10 TICs	EPA Method 625	2
8 RCRA Metals	EPA Method 6010/7470	2
PCBs	EPA Method 8082	1

Note: PCBs will be sampled in soil at AOC-1 and AOC-8 only. PCBs will be sampled in surface water only at the downgradient seep water sample location, AOC-11.

Closure

We have scheduled the fieldwork for this Thursday, March 31, 2011, so please provide us with your comments regarding the proposed sampling program by Wednesday, March 30. S&ME welcomes the opportunity to work with you to assist Crescent Erwin Venture I, LLC in this important Brownfields re-development project. Should you have any questions regarding this Sampling Program, please call us at (919) 872-2660.

Sincerely,

S&ME, Inc.


Chris Hamblet, CHMM
Environmental Scientist


Tom Raymond, P.E.
Environmental Services Manager

Attachment: Figure 1 - Proposed Sample Location Map



1 Proposed Soil Boring Location

1 Proposed Seep Sample Location

Basemap Source: NCDOT Aerial Photograph dated March 3, 1977

1 <small>FIGURE NO.</small>	Proposed Sample Location Map	 S&ME WWW.SMEINC.COM <small>NC ENGINEER LICENSE #F-0176 3201 SPRING FOREST RD, RALEIGH, NC 27618</small>	<small>SCALE:</small> Not to Scale	<small>DATE:</small> 2011-03-24
	5.5-Acre Former Burlington Industries Site 2109 Hillsborough Road, Durham, NC		<small>PROJECT NUMBER:</small> 1054-10-288A	<small>DRAWN BY:</small> CLH