

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

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Phase I Environmental Evaluation And Comprehensive Regulatory Compliance Audit

Metal Plating & Fabricating Inc.
High Point, North Carolina

Prepared for

Mr. Demetrius Gooden
High Point Bank & Trust Company

February 4, 1993

Brett S. Higgins
Staff Geologist

Table of Contents

1. Introduction	1
2. Review of Public and Private Records	1
2.1 Chain of Title	2
2.2 USGS Map and Aerial Photograph Review	2
2.3 Regulatory Agency Records	4
2.4 Area Reconnaissance and Surrounding Land Use	11
2.5 Local Authority Records	11
3. Site Description	12
3.1 Property and Grounds	12
3.2 Vegetation	16
4. Regulatory Compliance Audit	17
5. Geologic/Hydrogeologic Characteristic	20
6. Recommendations	21
7. Limitations	22

Appendix A - Summary of Chain-of-Title
Appendix B - Aerial Photographs

1. Introduction

ENSCI Corporation has completed a Phase I Environmental Evaluation and Comprehensive Regulatory Compliance Audit of Metal Plating & Fabricating Inc., located at 2309 Dunmore Court, in High Point, North Carolina. Metal Plating & Fabricating Inc. fabricates and electroplates metal furniture, which includes primarily seating and tables.

This evaluation was authorized by Mr. Demetrius Gooden, of High Point Bank & Trust Company. Its purpose is to provide an assessment of the environmental risks and liabilities and compliance issues that could be associated with the property and which could pose a threat to human health or the environment.

The Phase I Environmental Evaluation consists of two steps:

- Reviewing public and private records for evidence of past or present activities on-site or in the immediate vicinity of the site, such as the disposal of hazardous materials, that may have resulted in contamination of the site; and
- Conducting a site reconnaissance for unusual indications of past or current presence of hazardous materials on or adjacent to the site.

This report presents a description of ENSCI's investigative activities and findings based on available information. If any additional information becomes available, ENSCI requests the opportunity to review it, and modify our conclusions, if considered appropriate.

2. Review of Public and Private Records

ENSCI Corporation's review of public and private records for this site included the following activities:

- Review of USGS topographic map and aerial photographs (1970, 1982, & 1988).
- Review of various appropriate records published by state and national environmental agencies regarding sites which could potentially affect the subject property.

- A site reconnaissance of surrounding properties to supplement the environmental agency record review.
- Contact with North Carolina state agencies responsible for the enforcement of environmental regulations.
- Contact with local authorities regarding the site.

2.1 Chain of Title

Chain-of-title information for the subject property was researched by ENSCI Corporation at the Guilford County Register of Deeds office, in High Point, N.C. Ownership of the property was researched back to 1910 when it was purchased by W.L Kimrey from W.H. Wicks & wife Zellah Wicks. Based on the information reviewed, part of the property was used for a private residence until it was purchased by Metal Plating & Fabricating Inc. on March 3, 1971. Mr. Robert Hilton, current owner of facility was part of a group of investors that developed the property in 1971. Mr. Hilton became sole owner of the company in 1979. A summary of the chain-of-title is provided in Appendix A of this report.

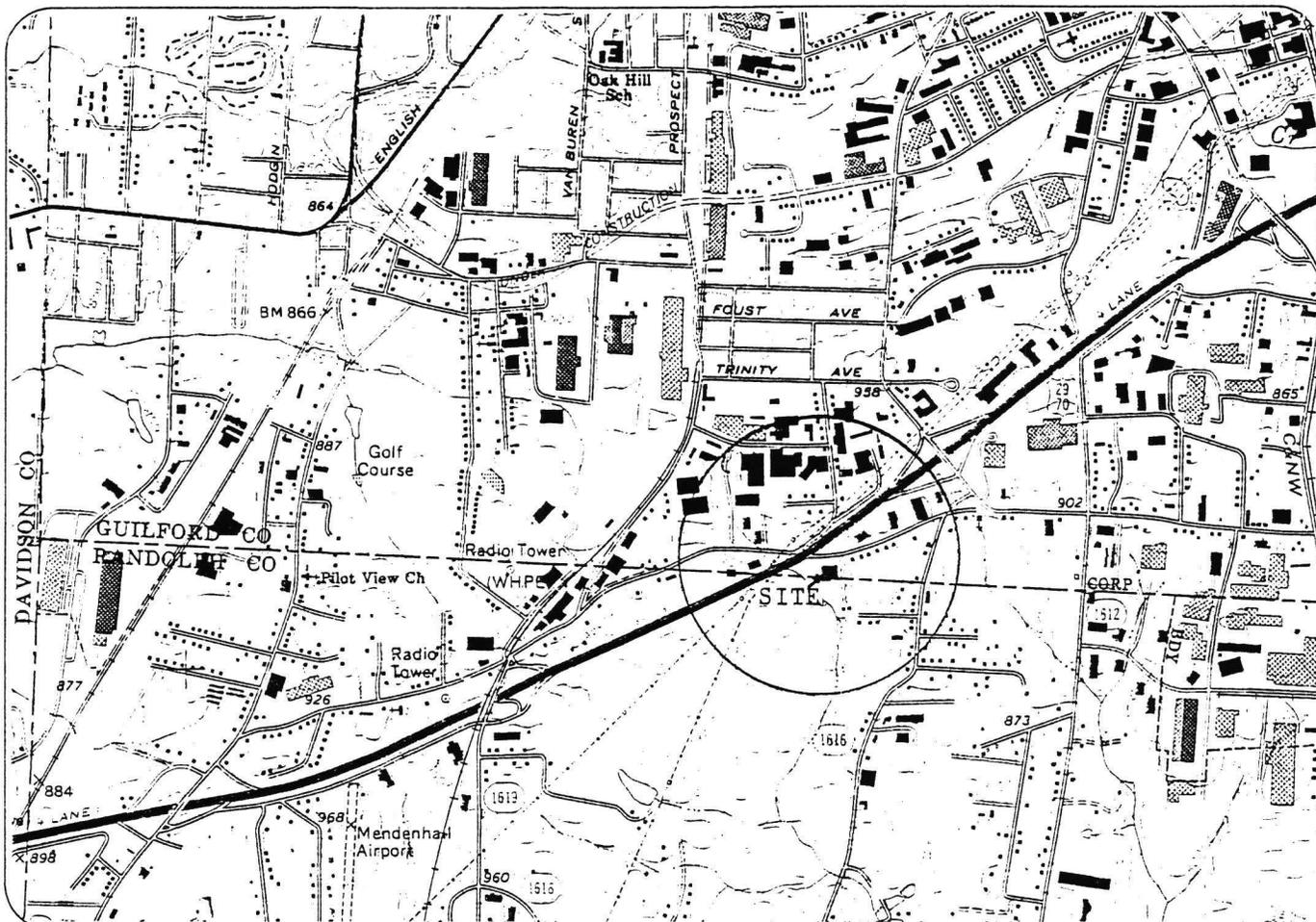
2.2 USGS Map and Aerial Photograph Review

Available maps and other information which illustrates the subject site and surrounding properties were reviewed as part of ENSCI's assessment. The information included the High Point West Quadrangle, United States Geological Survey (USGS) map dated 1969 and photorevised in 1987, an excerpt of which is included as **Figure 1**. Also reviewed were aerial photographs from 1970, 1982 and 1988, obtained from the City of High Point Planning Department.

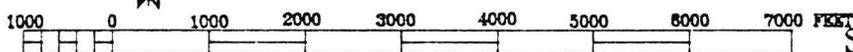
The aerial photos indicate that the surrounding land use has been a combination of residential and industrial for at least the past 22 years. Review of 1970 aerial photo indicates that subject site was partially occupied by a private residence while the other areas were undeveloped. In the 1982 aerial, the current facility is shown indicating that it had been constructed between 1970 and 1982. According to Mr. Hilton the original building was constructed in 1971, then two sperate additions were added on in 1972 and 1973 respectively. Review of the 1982 and 1988 aerials indicate where the two additions were added to the existing building. The original building is approximately 15,500 square feet, while the additions are 7,200 and 8,500 square feet. The 1988 aerial indicates that no additional construction occurred at the site. Copies of the aerial photographs are provided in Appendix B of this report.

TOPOGRAPHICAL MAP

Metal Plating & Fabricating
High Point, North Carolina



USGS HIGH POINT WEST 7.5 MINUTE QUADRANGLE
 DATE OF MAP: 1969 PHOTOREVISION DATE: 1987
 PHOTOREVISION DENOTED IN PURPLE (COLOR MAPS ONLY)



SCALE 1:24000



ROAD CLASSIFICATION

- | | | | |
|------------------|-------|------------------|---|
| HEAVY-DUTY | ===== | U.S. ROUTE | ⬡ |
| MEDIUM-DUTY | ===== | STATE ROUTE | ○ |
| LIGHT-DUTY | ===== | INTERSTATE ROUTE | ⬢ |
| FOOT TRAIL | ----- | | |
| WGN & JEEP TRACK | ----- | | |
| UNIMPROVED ROAD | ===== | | |



FOR:	METAL PLATING & FABRICATING	CITY:	HIGH POINT
TITLE:	TOPOGRAPHICAL MAP		
SCALE:	1" = 2000'	DWN BY:	DJ
DATE:	12/15/92	DWG NAME:	USGS-1
CK BY:	BSH	FIGURE:	1
		JOB #:	AH14-006

2.3 Regulatory Agency Records

ENSCI reviewed several federal- and state-published records regarding the investigation and enforcement of regulations related to hazardous wastes and/or substances. Following is a summary of each referenced document or database: In our current review of the regulatory lists, Metal Plating & Fabricating Inc. was included on the USEPA Wastlan Pre-remedial/Federal Facility Report and the Investigations Pending Sites Report. The site was included on these lists as the result of an investigation performed by the State of North Carolina in 1990. The following is a summary of the work performed.

In February of 1990, the North Carolina Department of Environment, Health, and Natural Resources (NCDEHNR), Division of Solid Waste Management conducted an investigation at the subject site. Four hand augered soil borings were performed in the area of the wastewater treatment system located on the south side of the building. A background surface soil sample was taken outside the area of the treatment system and additional surface soil samples were taken adjacent to the nickel treatment tank and along an apparent surface water drainage pathway. At the fourth sampling point, the boring was advanced to a depth of 14 feet to attempt to obtain a groundwater sample. The soil was noted as damp, however groundwater was not encountered. Due to the density of the material, the hand auger could not be advanced any further, therefore a soil sample was obtained at 14 ft. Laboratory results from the soil samples taken indicated that no contamination was found at the subject site, therefore the State did not recommend that further action be performed.

National Priorities List, February, 1992

The National Priorities List is a list of the nation's most serious hazardous waste sites falling under the Comprehensive Environmental Response Compensation, and Liability Act (CERCLA) regulations.

No sites were listed for the area at the time of review. Based on this current review of the National Priorities List, ENSCI is of the opinion that National Priorities List does not include sites in the immediate proximity of the subject property or sites located such that they could present a probability of environmental impact to the subject property.

Active Permitted Solid Waste Landfills, February, 1992

The National Survey of Solid Waste Landfills was conducted by the EPA Office of Solid Waste in 1986 to collect detailed information on municipal landfills. The following site falls in the general area of the subject property:

High Point City Landfill
Kivett Drive

Based on the current review of the Active Permitted Solid Waste Landfills List, ENSCI Corporation is of the opinion that the listed site is not in the immediate proximity of the subject property or located such that it could present a probability of environmental impact to the subject property.

USEPA Wastelan Pre-remedial/Federal Facility Report, September, 1992

This report lists sites that are in an investigation stage but are not yet in remediation. The following sites fall in the general area of the subject property:

AMF Hatteras Yachts
Kivett Drive

Custom Finishers Inc.
2213 Shore St.

Duke Refining Corp.
Address not given

Guardsmans Chemicals Inc.
2147 Brevard Road

High Point City Landfill
Kivett Drive

High Point Furniture Industries
1121 Corporation Drive

City of High Point
Address not given

Hoover Universal, Inc.
Address not given

Lilly Company Inc.
1717 English Road

Metal Plating & Fabricating Inc.
2308 Dunmore Court

Miller Desk Inc.
1212 Lincoln Drive

Reliance Universal
Address not given

Royal Development Inc. (two sites)
Addresses not given

Safety Kleen Corp. 3-064-01
Mendenhall Road

United Drum T/A Reliance Universal
214 Berkley Street

USA Reserve XVIII Airborne Corps
Address not given

Valspar Corp.
1647 English Road

ENSCI's current review of the USEPA Wastlan Pre-remedial/Federal Facility Report, indicated that Metal Plating & Fabricating Inc. is included on list. As previously stated in this report, the NCDEHNR, Division of Solid Waste Management performed a site investigation at the subject site in February of 1990, however, the laboratory results of samples taken indicated that no contamination was found. Reliance Universal is also included on the USEPA Wastlan Pre-remedial/Federal Facility Report, and ENSCI Corporation is of the opinion that the facility is in the proximity of the subject property and located such that it could present a probability of off-site environmental impact to the subject property.

North Carolina State Priority List Sites, February, 1992

This list is an inventory of inactive hazardous substance or waste disposal sites.

No sites were listed for the area at the time of review. Based on the current review of the North Carolina State Priority List Sites, ENSCI Corporation is of the opinion that the list does not include sites in immediate proximity of the subject property or sites located such that they could present a probability of environmental impact to the subject property.

Investigations Pending Sites, February, 1992

This list includes sites which require evaluation before the priority of the site can be determined. The following sites fall within the general area of the subject property:

AMF Hatteras Yachts
Kivett Drive

Custom Finishers Inc.
2213 Shore St.

Duke Refining Corp.
Address not given

Dutch Cleaners
Address not given

Guardsmans Chemicals Inc.
2147 Brevard Road

Gulf Adhesives & Resins/Perkins
Address not given

High Point Furniture Industries
1121 Corporation Drive

Hoover Universal, Inc.
Address not given

Lilly Company Inc.
1717 English Road

Metal Plating & Fabricating Inc.
2308 Dunmore Court

Reliance Universal of Kentucky
Address not given

Royal Development Inc. (two sites)
Addresses not given

United Drum T/A Reliance Universal
214 Berkley Street

USA Reserve XVIII Airborne Corps
Address not given

Valspar Corp.
1647 English Road

As previously stated in this report, the NCDEHNR, Division of Solid Waste Management performed a site investigation at the subject site in February of 1990, however, the laboratory results of samples taken indicated that no contamination was found. Based on the current review of the Investigations Pending Sites Report, ENSCI Corporation is of the opinion that Reliance Universal is in the proximity of the subject property and located such that it could present a probability of off-site environmental impact to the subject property.

Hazardous Waste TSD (Treatment, Storage or Disposal) Facilities, February, 1992

This list is an inventory of facilities which have or are in the process of applying for a Resource Conservation and Recovery Act permit to treat, store or dispose of hazardous waste. The following sites falls within the general area of the subject property:

Safety Kleen Corp. 3-064-01
Mendenhall Road

Based on the current review of the Investigations Pending Sites Report, ENSCI Corporation is of the opinion that the listed site is not in the immediate proximity of the subject property, or located such that environmental impact to the subject property could occur.

North Carolina Responsible Party Voluntary Remedial Action Sites, February, 1992

This list includes facilities working with the Inactive Hazardous Sites Branch to conduct voluntary remedial actions and facilities working to determine if further action is necessary at the site.

No sites were listed for the area at the time of review. Based on the current review of the North Carolina Responsible Part Voluntary Remedial Action Sites, ENSCI Corporation is of the opinion that the list does not include sites in the immediate proximity of the subject property or sites located such that they could present a probability of environmental impact to the subject property.

Petroleum Underground Storage Tank (UST) Database, July, 1992

This database lists all registered underground storage tanks in North Carolina. Only UST's which ENSCI company feels are of concern and are within a 1/2 mile radius of the subject site are listed.

Southeastern Foam Rubber Co.
1409 Progress Ave.

Myrtle Desk Co.
1411 Progress Ave.

Handy Pantry #122
2424 W. Green Drive

Alma Desk: Plant "B" Systems
1300 Prospect St.

Metal Plating & Fabricating
2309 Dunmore Court.

North State Telephone Co.
1201 W. Fairfield Road

West Fairfield Superette
1204 W. Fairfield Road

Superbrand Dairy Products
1350 W. Fairfield Road

West Green Citgo
1302 Trinity Ave.

W.F. Mickey Body Co.
1305 Trinity Ave.

Reliance Universal
1431 Progress St.

ENSCI Corporation has listed only tanks recorded on the UST database as published by the Division of Environmental Management. It is likely that there are UST's which do not appear on this list.

ENSCI's current review of the UST database, indicated that the subject site is listed as having UST's on-site, however no additional information was given. According to Mr. Hilton, two UST's are presently on-site which include; (1) 12,000 gallon and (1) 8,000 gallon fuel oil tanks installed in 1971.

ENSCI Corporation is of the opinion that the existing UST's at the facility pose an environmental threat to the subject site. According to current federal regulations, all tanks installed from 1970 to 1974 were required to have some type of leak detection by December of 1991. ENSCI recommends that the tanks be removed and permanently closed to eliminate the liability associated with them.

2.4 Area Reconnaissance and Surrounding Land Use

In addition to the reviews of records discussed above, ENSCI conducted a drive-by reconnaissance of property located within a one-mile radius of the subject site to investigate potential environmental concerns.

The surrounding land use was based primarily on visual observations made at the time of the drive-by and walk through investigations and our review of the USGS map and aerial photographs. From the review, ENSCI determined that the surrounding land use is a combination of industrial, commercial and residential in the immediate vicinity of the site.

Some of the industry in the immediate area of the site includes, truck sales and service, chemical manufacturing, upholstery, and furniture manufacturing. Bruce Essick truck sales and service borders the property to the east. Carol Essick was contacted to determine if the facility has any UST's on-site. Ms. Essick stated that no UST's are on-site, and all waste oil and coolants are stored in above ground tanks supplied and serviced by Safety Kleen. One of the industries in the vicinity of the subject property is Reliance Universal located at 1431 Progress Avenue on the north side of US Hwy 29-70. The facility is a manufacturer of finishing materials for the furniture industry. A unnamed tributary of the Uwharrie River originates on the Reliance property, flows south under Hwy 29-70 and eventually cuts across the southern area of the subject site. The tributary could transport contamination to the subject property in the event of a sizable leak or spill at the Reliance facility.

2.5 Local Authority Records

ENSCI Corporation contacted Mr. Richard Black, Inspector for the High Point Fire Department on January 6, 1992 to review the possibility of hazardous materials on the property. Mr. Black has been an Inspector for the Fire Department since 1989 and is responsible for conducting inspections of industrial facilities in the area of the subject site. He stated that he was familiar with the Metal Plating & Fabricating Inc. facility but was not responsible for conducting inspections of the facility. Mr. Black reviewed the file for the facility and told us that the last inspection was conducted in August of 1991 by an individual who is no longer with the High Point Fire Department. No violations were issued to the facility during that time, however the facility is currently due for another inspection. He also stated that based on his current knowledge of the facility, he was unaware of any environmental related problems associated with the site.

When asked about the surrounding industries, Mr. Black stated that to the best of his knowledge, no significant spills or incidents have occurred which resulted in an impact to the environment at Reliance Universal or the other surrounding properties in immediate vicinity of the subject site.

3. Site Description

On Monday, October 27, 1992, a Staff Geologist from ENSCI Corporation conducted an evaluation of the property and the surrounding area. **Figure 2** shows the site with the existing building and adjacent properties. Figure 2 was adapted from a site plan supplied by Metal Plating & Fabricating Inc., and updated based on the observations made during the site inspection.

3.1 Property and Grounds

The subject property is located at 2309 Dunmore Court, in southern High Point, North Carolina. The site is 4.12 acres in size with an existing one story 31,200 square foot building. The building and parking areas occupy the northern portion of the property, while southern area undeveloped wooded land. The facility is made up of three sections that were built at separate times. The original and largest section of the building is a one story 15,500 sq. ft. brick building, while the additions include 7,200 sq. ft. and 8,500 sq. ft. sections.

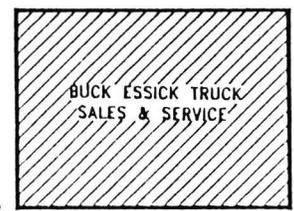
The surface topography at the site is level around the building area but slopes moderately to the south behind the facility carrying surface runoff toward an unnamed tributary of the Uwharrie River. Drainage of the general area is assisted by the tributary which cuts across the southern portion of the site and flows approximately 2400 feet south to the Uwharrie River. The site is bordered to the north by U.S. Hwy 29-70, to the east by Bruce Essick Truck Sales & Service Center and to the south and west by undeveloped wooded property.

As part of the walk through site visit, each area of the facility was inspected for existing or potential environmental concerns. The facility is divided into five general areas of production that include, metal storage and cutting room, fabrication and welding room, buffing room, plating room and finishing and storage area. The following will address the basic function of each area and the observations made during our inspection.

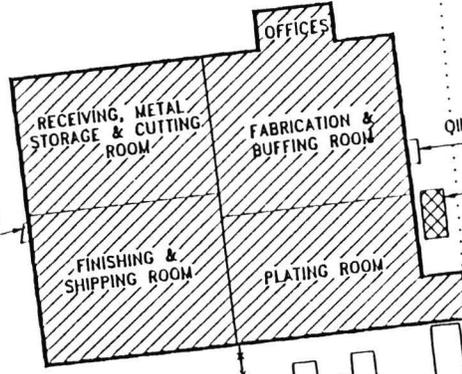
RELIANCE
UNIVERSAL

U.S. HIGHWAY 29/70

DUNMORE CIRCLE



BUCK ESSICK TRUCK
SALES & SERVICE



RECEIVING, METAL
STORAGE & CUTTING
ROOM

OFFICES

FABRICATION &
BUFFING ROOM

FINISHING &
SHIPPING ROOM

PLATING ROOM

OIL STAINING AT
COMPRESSOR
BLOWDOWN

8000 GALLON UST

LOADING
DOCK

STORAGE
SHED

WASTEWATER
TREATMENT SYSTEM

12000 GALLON
UST.

DRIVEWAY

WOODED
AREA

WOODED
AREA

APPROXIMATE LOCATION
OF ABANDONED DRUMS

CREEK

APPROXIMATE PROPERTY LINE



FOR: METAL PLATING & FABRICATING, INC.

CITY: HIGH POINT STATE: NORTH CAROLINA

TITLE: SITE PLAN

SCALE: 1" = 100'

DATE: 12/29/92

JOB NO.: AH14-006

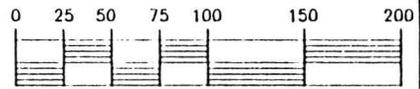
DWG. NO.: NPF-1

DRAWN BY: DJ

CHECK BY: BSH

TYPE: PHASE 1

REV. FIGURE NUMBER: 2



GRAPHIC SCALE IN FEET

Metal Storage and Cutting Room

This area is used for receiving and storage of bulk materials and for cutting and bending of the metal tubing. The cutting and bending machines were leaking oil onto the floor, and an excessive amount of absorbent material was noted around the machines. A drum of hydraulic oil was being stored in this area. Some staining and puddling of oil was noted around the base of the drum.

Fabrication Room

In this area metal parts for the frame of the furniture are sanded, welded and assembled. A considerable amount of material that was apparently oil was noted on the floor adjacent to the wet sander. Absorbent material had been applied to the area, but had not been cleaned up. For the most part the area appeared to be in good condition.

Buffing Room

In this area, the metal parts that have been assembled are buffed and prepared for the plating process. According to the Material Safety Data Sheet (MSDS) a buffing compound made of aluminum oxide and precipitated silica is used to produce a polished finish on the metal furniture. An excessive amount of buffing compound residue was noted on the floor and walls of the room. An exhaust fan is mounted on the east wall of the room to eliminate some of the airborne residue. This material is blown out into a bag house collection system which deposits the particulate matter into a 55 gallon container.

The compressor room is located in between the buffing room and plating room. An excessive amount of oil was noted on and around the compressor unit. Some absorbent material had been applied to the area, however it appeared that it had not been cleaned up in awhile.

Plating Room

In this area, the fabricated and polished furniture or furniture parts are chrome or brass electroplated using a and allowed to dry before moving to the finishing and shipping area. Hazardous waste generated at the site includes sludges from the plating process, which contain chromium, nickel and copper. These sludges are residues from the treatment of rinsewater from the electroplating operations. The rinsewater is treated in

a continuous process to destroy cyanide, reduce chromium VI to chromium III and precipitate all heavy metals as metal hydroxides. The metals are allowed to settle out in a holding tank and the treated water discharges into the High Point sanitary sewer system. The City of High Point has approved this discharge and monitors it daily. The treated water is also tested weekly by a private laboratory. The metal hydroxide sludge is accumulated at a rate of approximately 200 pounds per month, is stored on-site in the settling tanks and is periodically removed for off-site disposal at a treatment, storage and disposal facility (TSD). In addition to the sludges, hazardous waste in the form of contaminated carbon is generated from the plating bath filters and is added to the sludges for disposal. The carbon is used as a packing material for filtering nickel from the plating bath solution. According to current RCRA files the facility is listed as a small generator of hazardous waste.

Partially full, uncovered containers of plating sludges were noted in the area of the plating line, and some of the containers used to transport the sludges appeared old and corroded. Empty containers of plating chemicals crowd the area of the plating line and a section of the floor drain that surrounds the line is clogged by metal debris.

The waste water treatment system was visually inspected for evidence of leaking holding tanks, soil staining or mishandling of the hazardous waste. The chrome treatment, nickel treatment, mixing, and settling tanks are all above ground, while the cyanide treatment tanks were installed 80 to 90 percent below ground and are considered UST's. The treatment system appeared to be in satisfactory condition and there were no apparent spills or evidence of stressed vegetation in the area.

Finishing and Shipping Areas

This area is used for the final stages of the production, shipping the finished product and storage of chemicals. Some other miscellaneous materials (old equipment, obsolete parts etc.) are also stored in this area. The metal plated furniture is cleaned and prepared for shipping. Some limited spray booth finishing is also performed in this area.

The chemicals in the area are stored in two groups. A group labeled poisons are stored adjacent to a bay door on the west side of the room. The other is labeled corrosives and they are stored along the north wall of the room. The poison chemicals include zinc cyanide, nickel sulfate, nickel chloride, and copper cyanide, while the corrosive include; oxidizers, chromic acid, nickel carrier, boric acid, and sodium hydroxide mixture. These storage areas seemed to be fairly neat, however the area did not have any form of spill containment.

Small containers of flammable liquids were stored in the open adjacent to the spray booth. According to fire code, these materials should be stored in a cabinet or an area separate from the spray booth operations.

Exterior property and grounds

- UST fill and vent pipes were noted on the east and south sides of the building. Mr. Hilton indicated they are 1 - 12,000 gallon and 1 - 8,000 gallon fuel oil UST's used to heat the building. The UST's have not been used since the facility was converted to natural gas heat, approximately two years ago.
- A considerable amount of oil staining was noted beneath the compressor blow down pipe on the east side of the building.
- Oil staining was noted adjacent to an electrical transformer on the east side of the building.
- 20 - 25 old drums were noted near the southern border of the site adjacent to the creek. The drums were highly corroded and some were found to be partially full.
- Some empty chemical containers are stored in an open shelter on the west side of the building. The bungs were in-place on most of these containers, however they were stored on the ground without any type of spill containment.

3.2 Vegetation

The existing building and gravel parking lot occupy the northern portion of the land space at the site with grassed areas surrounding the perimeter of the building. The southern portion of the site is thickly wooded in mature to old age forest.

Some oil staining was noted adjacent to the compressor blow down on the east side of the building and some areas of slightly stressed vegetation were noted in the area of the wastewater treatment system behind the building.

4. Regulatory Compliance Audit

As part of the Regulatory Compliance Audit portion of the investigation, ENSCI addressed several issues to determine if the facility is in compliance with current federal and state regulations. The following is a summary of the compliance issues addressed.

Air Emissions

The facility has three sources of air emissions associated with the manufacturing operations on-site. The buffing room, chrome plating operation, and spray booth. According to Darren Cecil, Plant Manager of the facility, these air emission sources do not have permitted air filtration systems in-place. Air permit applications can be obtained from the Winston Salem regional office of the North Carolina Department of Environment, Health, and Natural Resources, Air Quality Section. According to North Carolina General Statute 143-215.108 an air permit must be obtained prior to the installation and operation of the air emissions system.

Based on our review of the current air emissions information for the facility, MP&F Inc. is currently not in compliance with existing air emission regulations. In order to be in compliance with current regulations, MP&F Inc. must obtain an air permit for each air emissions system. Failure to do so may result in administrative or civil actions.

Chemical Storage

Chemicals used at the facility include plating chemicals, oxidizers, finishing materials and other miscellaneous cleaning materials. The plating chemicals, oxidizers, and finishing materials are stored in separate groups in the finishing and shipping room shown on Figure 2.

Based on the review of the chemical storage practices at the facility, ENSCI Corporation is of the opinion that the chemicals used have generally been stored properly except for a few factors. The current storage area is not equipped with spill containment and seemed to be slightly congested during the site inspection.

Material Safety Data Sheets (MSDS's) Review

ENSCI reviewed copies of MSDS's at the facility to insure that each chemical used on-site had a MSDS and to review safety data of the types of chemicals stored. The MSDS's provide physical data, fire and explosion data, emergency and first aid procedures, health hazard data, reactivity data, spill or leak procedures, ventilation and personal protective equipment, and special precautions including storage requirements. Copies of the MSDS's are kept in a file by Darren Cecil but were not readily available to employees. According to Title 29, Part 1910.1200 of the Code of Federal Regulations (CFR), copies of MSDS's must be readily accessible during each work shift to employees when they are in their work areas in the event of a spill or leak. Based on our review of the available information, ENSCI Corporation is of the opinion that the facility has MSDS's for all chemicals kept on-site, however they are not readily available to employees.

OSHA, and SARA Title III Right To Know Review

The Occupational Safety and Health Act of 1970 created the Occupational Safety and Health Administration (OSHA) within the Department of Labor and encouraged employers and employees to reduce work place hazards and to implement safety and health programs. MP&F Inc. does not have a designated Health and Safety Director and does not conduct periodic training sessions at the facility. Darren Cecil stated that health and safety information was periodically handed out to employees and health and safety signs were posted in employee work areas.

During the walk through inspection of the facility, working conditions and work place safety were observed for evidence of OSHA violations. The facility was found to fairly organized and the majority of the employees in the manufacturing areas were wearing safety glasses. Employees working in the plating room were not wearing protective clothing. The eye wash station and safety shower at the plating line were operable at the time of our site inspection, however there was only one nozzle on the eye wash device. Excessive oil was noted on the floor in the areas of the cutting machines, wet sander, and compressor, which presents a potential physical hazard to employees.

Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) is the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA). EPCRA provides a comprehensive federal-state-local program for reporting information on hazardous chemicals. With very few exceptions, the Act applies to all employers who store 55 gallons or 500 pounds or more of hazardous chemicals.

According Mr. Cecil, the amount of hazardous material stored on-site at any given time is greater than 500 pounds, therefore MP&F Inc. is required to report it. Mr. Cecil stated that the High Point Fire Department has been supplied with a list of all chemicals stored or used on-site as required.

North Carolina requires employers regulated by SARA to develop a hazardous substance list which includes the following information:

- chemical or common name used on MSDS or container label,
- storage area in the facility and potential variations in temperature or pressure,
- maximum amount stored at the facility at any time.

According to Darren Cecil, the hazardous substance list was generated in 1992 at the request of the High Point Fire Department and was generated by MP&F Inc. and is available to employees at the facility.

Stormwater

Based on current EPA regulations, certain activities defined as "industrial activities" are required to apply for and obtain a permit under the National Pollutant Discharge Elimination System (NPDES) for discharges of stormwater runoff. The deadline for existing stormwater runoff discharges from industrial activities was October 1, 1992. According to Mr. Darren Cecil the facility does not have a stormwater discharge permit. Based on the Standard Industrial Code (SIC #3446) for the facility, the facility can be covered under NPDES General Permit No. NCG030000.

The Notice of Intent (NOI) portion of the application must be submitted with a \$400.00 fee as soon as possible. The other portion of the application should be completed within the next calendar year.

Non-Hazardous Waste Disposal

The non-hazardous waste at the facility includes metal scraps from the cutting and fabricating rooms and metal sludges from the wet sander. These materials are disposed of by Cranford Metal approximately every two months.

Other non-hazardous waste generated at the facility includes paper, cardboard and other miscellaneous office and shipping materials. This waste is stored in a trash dumpster and is picked up by BFI Waste Management and transported to High Point City Landfill.

Hazardous Waste Disposal

According to the North Carolina Division of Hazardous Waste Management, Metal Plating & Fabricating is considered a small quantity generator of hazardous waste (US EPA No. NCD053486395). Small quantity generators are those facilities that generate between 220 and 2200 pounds of hazardous waste per month. ENSCI's review of waste disposal manifests from MP&F Inc. indicate that the hazardous waste has been transported and disposed of by Chemical Conservation Corporation of Orlando Florida, and Ecoflo Inc. of Greensboro, North Carolina. Chemical Conservation Corp. disposes of sludges and slurries from settling and baffle tanks in the waste treatment system, while Ecoflo disposes of containers of solid waste from the plating process and 55 gallon drums of spent lacquer (approx. 3-5 drums/yr). According to MP&F Inc. records, the first shipments of sludge from the treatment system were disposed of in November and December of 1986, and additional shipments were disposed of in February of 1990.

5. Geologic/Hydrogeologic Characteristic

High Point is located in the western portion of the Carolina Slate Belt Hydrogeologic Unit of North Carolina. The surface geology consists of regional soils created by the weathering of underlying bedrock. According to the 1985 Geologic Map of North Carolina the area is underlain by metamorphosed granitic rock to metamorphosed gabbro to diorite, with no major geologic features transecting the area. No rock outcrops were observed during the site investigation.

In general, both surface and groundwater directions are controlled by topographic contours of land forms in the Piedmont with flow occurring perpendicular to the contours from high to low elevations. Subsurface groundwater movement in the High Point area can be expected to typically average 15 to 25 feet annually. Many structural features such as faults, fractures, and cracks can significantly enhance groundwater flow rates. Without very specific site information, only qualitative groundwater flow statements can be made with respect to the subject property. Determination of groundwater quality and flow rates was beyond the scope of this assessment.

6. Recommendations

ENSCI Corporation, during its site investigation, review of public information, and personal interviews and evaluation of current data, encountered evidence of potential on-site sources of environmental liability at the subject property. There were also a potential off-site source of environmental liability associated with the subject site.

Based on the environmental concerns noted in section 3.1 and 4.0 of this report, ENSCI Corporation is of the opinion that the following corrective measure should be taken in order to reduce environmental liability, and health, safety and fire hazards associated with the subject property.

- Apply for air permits for the buffing, plating and spray booth filter systems. According to North Carolina General Statute 143-215.108, air permits must be applied for and approved 90 days before a filter system can be installed.
- Permanently close the 12,000 and 8,000 gallon fuel oil UST's according to North Carolina Department of Environment, Health & Natural Resources regulations.
- Assess oil staining at compressor blow down and electrical transformer locations.
- Remove and dispose of abandoned 55 gallon drums on the south area of the property.
- Construct a concrete containment pad to store the empty chemical containers underneath the open shelter on the west side of the building.
- Construct a containment dike for each of the chemical storage areas according to fire code regulations.
- Apply for Stormwater permit under General Permit No. NCG030000.
- Repair oil leaks in machinery in the cutting and fabricating rooms and clean up excess oil.
- Replace or repair eye wash station on plating line.
- Address partially full uncovered and corroded containers of hazardous waste sludge in area of plating line, and improve waste management practices.

In 1990, the NCDEHNR, Division of Solid Waste Management performed a limited soil investigation in the area of the wastewater treatment system but did not indicate the presence of soil contamination at the site. ENSCI Corporation is of the opinion that a

more extensive investigation should be performed at the site to determine if soil and groundwater have been impacted by the wastewater treatment system, existing UST's or other on-site operations.

The off-site concern identified is Reliance Universal which is located north of the facility, across U.S. Hwy 29-70. The facility is topographically upgradient from the subject site and ENSCI is of the opinion that impact to the site could occur in the event of a spill or leak at the facility. Although ENSCI Corporation did not identify impact to the subject site from off-site sources, it cannot be conclusively determined without further investigation. Further investigation would include the installation of soil borings and monitoring wells to determine if soil and groundwater has been impacted.

7. Limitations

The observations made in this report are made under the conditions stated within this report and during the time periods as referenced. In preparing this report, ENSCI Corporation has relied upon public and private information from state and local officials and other parties referenced therein, and upon information contained in the files of the state and/or local agencies available to ENSCI Corporation at the time of the site assessment.

In no event shall ENSCI Corporation, its employees, agents, or representatives be liable for consequential or incidental damages. ENSCI Corporation's obligations and liabilities to High Point Bank & Trust Company is limited to fraudulent statements herein or gross negligence. We believe the data obtained during the evaluation of this site provides sufficient information upon which to base our judgement in reference to this site.

APPENDIX A

Chain of Title

High Point Bank & Trust

Phase I: Job # AH14-006

January 6, 1993

SUMMARY OF CHAIN-OF-TITLE

March 3, 1971 - Present	Metal Plating & Fabricating, Inc.	Deed Bk 2531 Pg 686
Sept. 1970 - Mar 3, 1971	P. M. Electroplating Co., Inc.	Deed Bk 2499 Pg 545
Oct 13, 1961 - Sept 1970	Graves, Johnny D. & Nancy T. Johnson, Raymond (Widower)	Deed Bk 1981 Pg 200
Jan 11, 1910 - ?	Kimrey, W. L.	Deed Bk 220 Pg 154

*Chain of Title information obtained from Guilford County Register of Deeds office
in High Point, North Carolina.*

APPENDIX B

Aerial Photographs

(Site Location)



COVERTS CLOTHING CO.

SUTTON WOODWORKING
AND MACHINE COMPANY

FAIRFIELD ROAD

RELLANCE/UNIVERSAL

U.S. HIGHWAY 29/70

FMA FABRIC OUTLET

DUNMORE COURT

BETHEL DRIVE

SITE LOCATION

MENDENHALL ROAD

0 40 80 120 160 200 300 400



METAL PLATING & FABRICATING STATE NORTH CAROLINA

1988 AERIAL PHOTOGRAPH

DATE 12 18 88 JOB # 4414-006



BETHEL DRIVE

D.S. HIGHWAY 29/70

DUNMORE COURT

HENDRIHALL ROAD

FAIRFIELD ROAD

SITE LOCATION

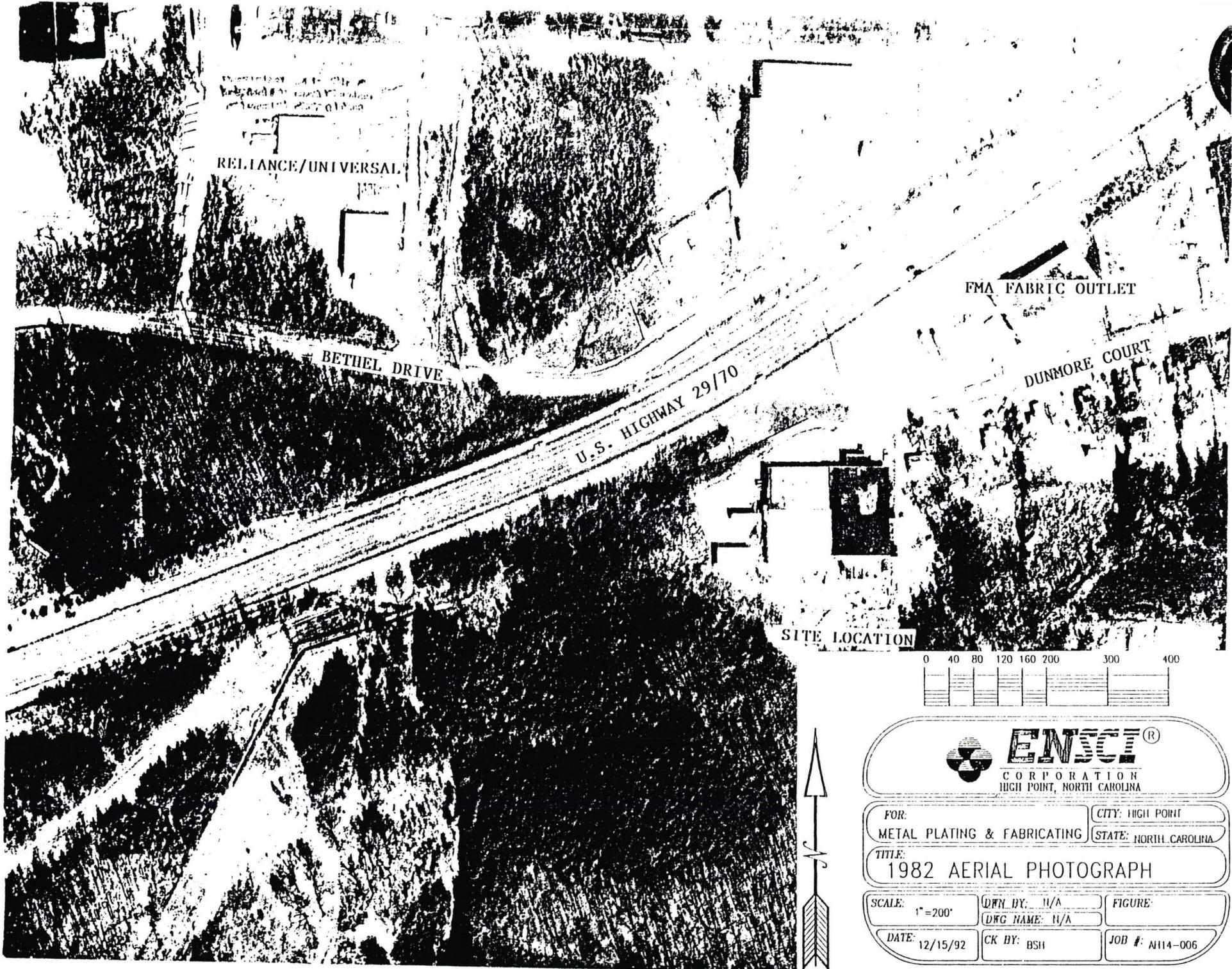


ENSCI[®]
CORPORATION
HIGH POINT, NORTH CAROLINA

FIRM CITY HIGH POINT
METAL PLATING & FABRICATING STATE NORTH CAROLINA

TITLE
1970 AERIAL PHOTOGRAPH

SCALE DRAWN BY DATE FIGURE
JOB # 4414-002



RELIANCE/UNIVERSAL

BETHEL DRIVE

U.S. HIGHWAY 29/70

FMA FABRIC OUTLET

DUNMORE COURT

SITE LOCATION

0 40 80 120 160 200 300 400



FOR: METAL PLATING & FABRICATING CITY: HIGH POINT STATE: NORTH CAROLINA

TITLE: 1982 AERIAL PHOTOGRAPH

SCALE: 1" = 200' DFN BY: N/A FIGURE: DFG NAME: N/A DATE: 12/15/92 CK BY: BSH JOB #: AH14-006



June 12, 1995

FAX DELIVERED (910) 771-4800

Mr. Joseph H. Deakins
North Carolina DEHNR
585 Waughtown Street
Winston-Salem, NC 27107

Subject: Metal Plating and Fabricating

Dear Mr. Deakins:

Pursuant to your visit to Fabrics Marketing Associates, Inc. newly acquired facility, the following plan is submitted to you as our agreement regarding the clean up of subject facility. If you have any additional needs or comments, please advise.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Moorefield'.

Mike Moorefield

Enclosures

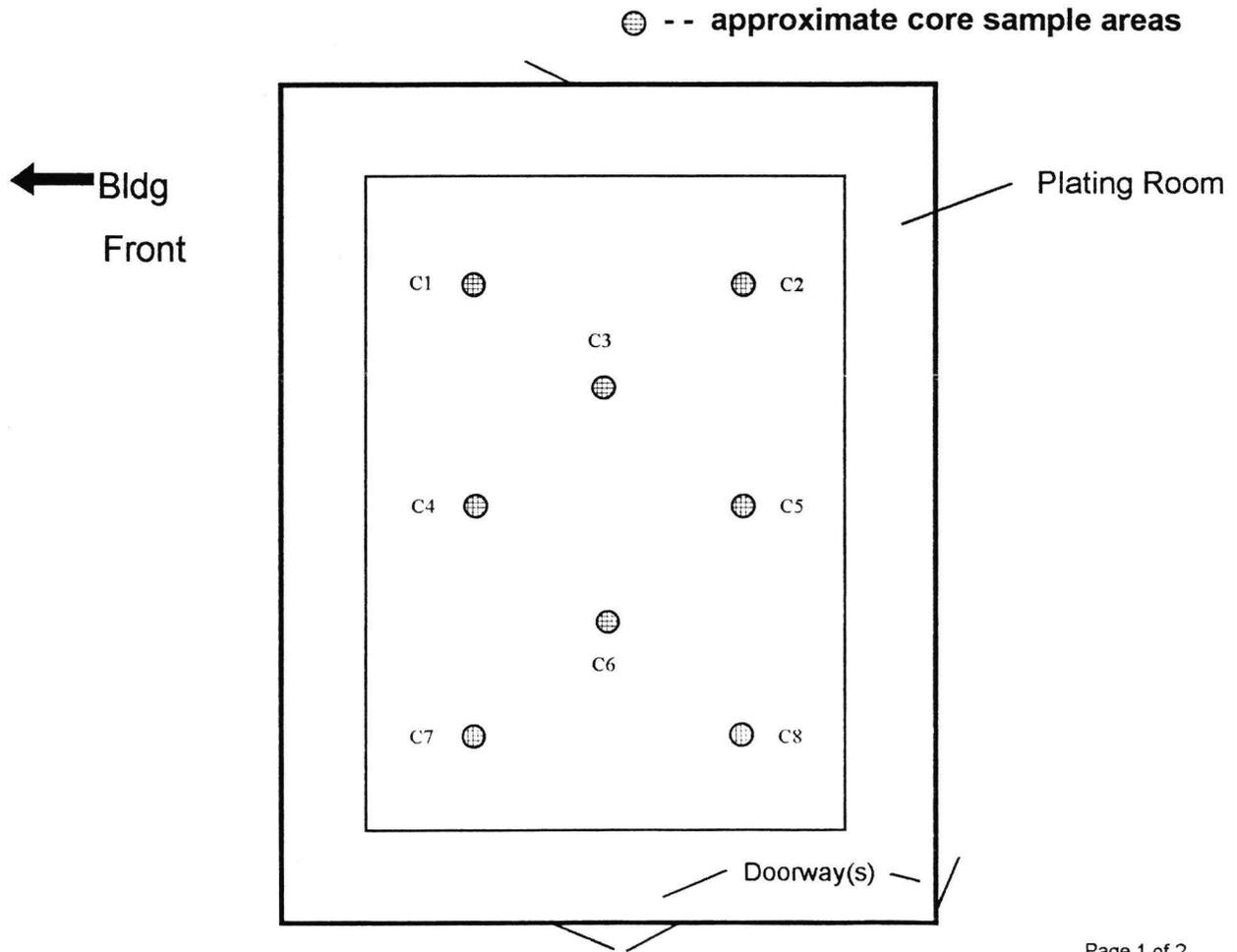
SITE STATUS

The former Metal Plating and Fabricating located at 2309 Dunmore Court, High Point, NC operated a metal plating room consisting of approximately 30 plating and rinse vats. Those vats, debris and residue have been removed and the concrete floor steam cleaned.

PURPOSE:

The purpose of this environmental assessment is to determine the environmental conditions in connection with the former plating operation at the site. Eight (8) cores (⊕) will be taken of the concrete, and soils underneath at levels of one(1), three (3) and six (6) feet. The concrete and soil cores will be analyzed for eight RCRA metals, copper, nickel, zinc and cyanide according to EPA analysis protocol.

The eight cores will be taken from the plating floor as described in the diagram below:



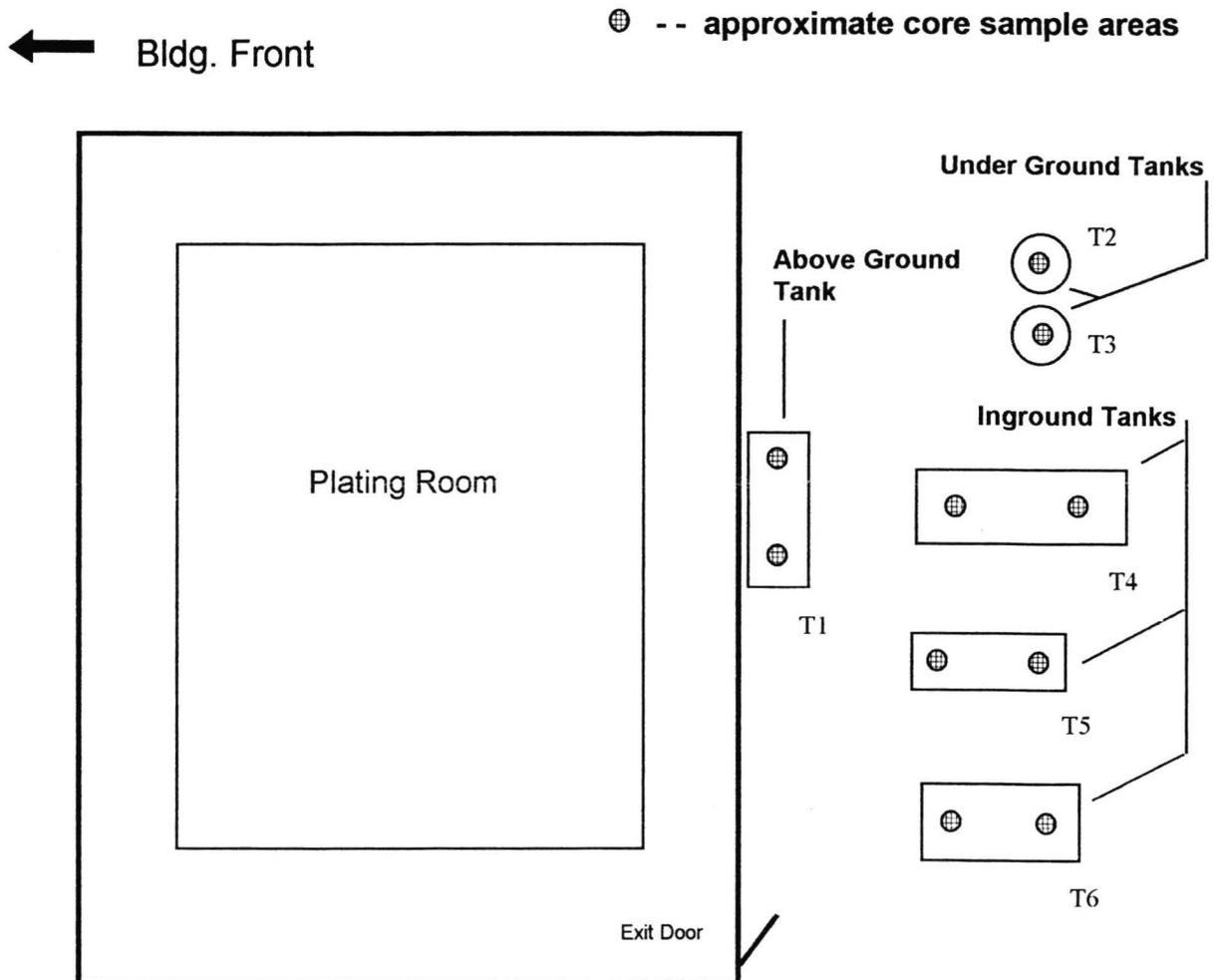
SITE STATUS

The former Metal Plating and Fabricating located at 2309 Dunmore Court, High Point, NC operated an exterior waste treatment plant consisting of one (1) above ground (#1), two (2) underground tanks, (#'s 2 & 3) and four inground tanks (#'s 4, 5, & 6).

PURPOSE:

The purpose of this environmental assessment is to determine the environmental conditions in connection with the waste treatment operation at the site. Ten (10) cores will be taken of the soils underneath at levels of one(1), three (3) and six (6) feet. The soil cores will be analyzed for eight RCRA metals, copper, nickel, zinc and cyanide according to EPA analysis protocol.

The ten (10) cores (⊕) will be taken from the waste treatment area as described in the diagram below:





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ENVIRONMENTAL CONSULTANTS ▲ ANALYTICAL LABORATORIES

P.O. BOX 1477 ▲ COEBURN, VIRGINIA 24230 ▲ 703/395-3661

CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
 PO BOX 6434
 HIGH POINT, NC 27262

REPORT DATE: 09/25/95

SITE ID: FMA

PROJECT: 716.4

COLLECTED BY: A. PURGASON

EMI #: 950919-03-A

ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
 DATE RECEIVED: 09/19/95
 DATE EXTRACTED: 09/21/95
 DATE ANALYZED: 09/21-22/95

TOTAL METALS

SAMPLE ID: RO-2078

<u>ELEMENT</u>	<u>DL. (mg/Kg)</u>	<u>RESULT (mg/Kg)</u>
Arsenic	2.5	BDL
Barium	2.0	220
Cadmium	2.5	BDL
Chromium	2.5	24.0
Lead	2.5	BDL
Mercury	0.1	0.40
Nickel	5.0	11.0
Selenium	2.5	BDL
Silver	2.5	BDL

Matrix: Non-Aqueous

DL - Detection Limit

BDL - Below Detection Limit

Method: Mercury - EPA 245.1
 Nickel - EPA 249.1
 Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer

Greg Ketchum

Lab Manager

PO [Signature]



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CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
PO BOX 6434
HIGH POINT, NC 27262

REPORT DATE: 09/25/95
SITE ID: FMA
PROJECT: 716.4
COLLECTED BY: A. PURGASON
EMI #: 950919-03-B
ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
DATE RECEIVED: 09/19/95
DATE EXTRACTED: 09/21/95
DATE ANALYZED: 09/21-22/95

TOTAL METALS

SAMPLE ID: RO-6028

<u>ELEMENT</u>	<u>DL (mg/Kg)</u>	<u>RESULT (mg/Kg)</u>
Arsenic	2.5	BDL
Barium	2.0	170
Cadmium	2.5	BDL
Chromium	2.5	370
Lead	2.5	26.0
Mercury	0.1	0.40
Nickel	5.0	65.0
Selenium	2.5	BDL
Silver	2.5	BDL

Matrix: Non-Aqueous

DL - Detection Limit
BDL - Below Detection Limit

Method: Mercury - EPA 245.1
Nickel - EPA 249.1
Other Metals - SW 846 (6010)

Knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

Greg Keston

Lab Manager

[Signature]



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CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
PO BOX 6434
HIGH POINT, NC 27262

REPORT DATE: 09/25/95
SITE ID: FMA
PROJECT: 716.4
COLLECTED BY: A. PURGASON
EMI #: 950919-03-C
ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
DATE RECEIVED: 09/19/95
DATE EXTRACTED: 09/21/95
DATE ANALYZED: 09/21-22/95

TOTAL METALS

SAMPLE ID: RO-704

<u>ELEMENT</u>	<u>DL (mg/Ka)</u>	<u>RESULT (mg/Ka)</u>
Arsenic	2.5	BDL
Barium	2.0	170
Cadmium	2.5	BDL
Chromium	2.5	31.0
Lead	2.5	BDL
Mercury	0.1	0.30
Nickel	5.0	91.0
Selenium	2.5	BDL
Silver	2.5	BDL

Matrix: Non-Aqueous

DL - Detection Limit
BDL - Below Detection Limit

Method: Mercury - EPA 245.1
Nickel - EPA 249.1
Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer

Sheq Kahan

Lab Manager

M. B. B...



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CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
PO BOX 6434
HIGH POINT, NC 27262

REPORT DATE: 09/25/95
SITE ID: FMA
PROJECT: 716.4
COLLECTED BY: A. PURGASON
EMI #: 950919-03-D
ANALYZED BY: ENI

DATE COLLECTED: 09/14/95
DATE RECEIVED: 09/19/95
DATE EXTRACTED: 09/21/95
DATE ANALYZED: 09/21-22/95

TOTAL METALS

SAMPLE ID: RO-6127

<u>ELEMENT</u>	<u>DL (mg/Kg)</u>	<u>RESULT (mg/Kg)</u>
Arsenic	2.5	BDL
Barium	2.0	300
Cadmium	2.5	BDL
Chromium	2.5	1026
Lead	2.5	180
Mercury	0.1	0.30
Nickel	5.0	170
Selenium	2.5	BDL
Silver	2.5	BDL

Matrix: Non-Aqueous

DL - Detection Limit
BDL - Below Detection Limit

Method: Mercury - EPA 245.1
Nickel - EPA 249.1
Other Metals - SW 846 (6010)



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PO BOX 6434
HIGH POINT, NC 27262

REPORT DATE: 09/25/95
SITE ID: FMA
PROJECT: 716.4
COLLECTED BY: A. PURGASON
EMI #: 950919-03-E
ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
DATE RECEIVED: 09/19/95
DATE EXTRACTED: 09/21/95
DATE ANALYZED: 09/21-22/95

TOTAL METALS

SAMPLE ID: RO-6130

<u>ELEMENT</u>	<u>DL (mg/Kg)</u>	<u>RESULT (mg/Kg)</u>
Arsenic	2.5	BDL
Barium	2.0	160
Cadmium	2.5	BDL
Chromium	2.5	270
Lead	2.5	BDL
Mercury	0.1	0.40
Nickel	5.0	37.0
Selenium	2.5	BDL
Silver	2.5	BDL

Matrix: Non-Aqueous

DL - Detection Limit
BDL - Below Detection Limit

Method: Mercury - EPA 245.1
Nickel - EPA 249.1
Other Metals - SW 846 (6010)

To the best of my knowledge and belief, the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer

Greg Ketchum

Lab Manager

M. B. Smith



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ENVIRONMENTAL MANAGEMENT SOLUTIONS
PO BOX 6434
HIGH POINT, NC 27262

REPORT DATE: 09/25/95
SITE ID: FMA
PROJECT: 716.4
COLLECTED BY: A. PURGASON
EMI #: 950919-03-F
ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
DATE RECEIVED: 09/19/95
DATE EXTRACTED: 09/21/95
DATE ANALYZED: 09/21-22/95

TOTAL METALS

SAMPLE ID: RO-6118

<u>ELEMENT</u>	<u>DL (mg/Kg)</u>	<u>RESULT (mg/Kg)</u>
Arsenic	2.5	BDL
Barium	2.0	120
Cadmium	2.5	BDL
Chromium	2.5	91.1
Lead	2.5	7.0
Mercury	0.1	0.40
Nickel	5.0	30.0
Selenium	2.5	BDL
Silver	2.5	BDL

Matrix: Non-Aqueous

DL - Detection Limit
BDL - Below Detection Limit

Method: Mercury - EPA 245.1
Nickel - EPA 249.1
Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer Greg Kelson

Lab Manager M. Bush



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ENVIRONMENTAL MANAGEMENT SOLUTIONS
PO BOX 6434
HIGH POINT, NC 27262

REPORT DATE: 09/25/95
SITE ID: FMA
PROJECT: 716.4
COLLECTED BY: A. PURGASON
EMI #: 950919-03-G
ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
DATE RECEIVED: 09/19/95
DATE EXTRACTED: 09/21/95
DATE ANALYZED: 09/21-22/95

TOTAL METALS

SAMPLE ID: RO-8013

<u>ELEMENT</u>	<u>DL (mg/Ka)</u>	<u>RESULT (mg/Ka)</u>
Arsenic	2.5	BDL
Berium	2.0	160
Cadmium	2.5	BDL
Chromium	2.5	730
Lead	2.5	BDL
Mercury	0.1	0.40
Nickel	5.0	52.0
Selenium	2.5	BDL
Silver	2.5	BDL

Matrix: Non-Aqueous

DL - Detection Limit
BDL - Below Detection Limit

Method: Mercury - EPA 245.1
Nickel - EPA 249.1
Other Metals - SW 846 (6010)



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ENVIRONMENTAL MANAGEMENT SOLUTIONS
 PO BOX 6434
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REPORT DATE: 09/25/95
 SITE ID: FMA
 PROJECT: 716.4
 COLLECTED BY: A. PURGASON
 EMI #: 950919-03-H
 ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
 DATE RECEIVED: 09/19/95
 DATE EXTRACTED: 09/21/95
 DATE ANALYZED: 09/21-22/95

TOTAL METALS

SAMPLE ID: RO-6106

<u>ELEMENT</u>	<u>DL (mg/Kg)</u>	<u>RESULT (mg/Kg)</u>
Arsenic	2.5	BDL
Barium	2.0	130
Cadmium	2.5	BDL
Chromium	2.5	950
Lead	2.5	BDL
Mercury	0.1	0.40
Nickel	5.0	35.0
Selenium	2.5	BDL
Silver	2.5	BDL

Matrix: Non-Aqueous

DL - Detection Limit
 BDL - Below Detection Limit

Method: Mercury - EPA 245.1
 Nickel - EPA 249.1
 Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer

Shug Ketchum

Lab Manager

M. Becht



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CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
PO BOX 6434
HIGH POINT, NC 27262

REPORT DATE: 09/25/95
SITE ID: FNA
PROJECT: 716.4
COLLECTED BY: A. PURGASON
EMI #: 950919-03-I
ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
DATE RECEIVED: 09/19/95
DATE EXTRACTED: 09/21/95
DATE ANALYZED: 09/21-22/95

TOTAL METALS

SAMPLE ID: RO-6060

<u>ELEMENT</u>	<u>DL (mg/Kg)</u>	<u>RESULT (mg/Kg)</u>
Arsenic	2.5	BDL
Barium	2.0	110
Cadmium	2.5	BDL
Chromium	2.5	86.0
Lead	2.5	BDL
Mercury	0.1	0.30
Nickel	5.0	36.0
Selenium	2.5	BDL
Silver	2.5	BDL

Matrix: Non-Aqueous

DL - Detection Limit
BDL - Below Detection Limit

Method: Mercury - EPA 245.1
Nickel - EPA 249.1
Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer

Greg Kotan

Lab Manager

M. Beal



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CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
 PO BOX 6434
 HIGH POINT, NC 27262

REPORT DATE: 09/25/95
 PROJECT #: 716.4
 SITE ID: FMA
 COLLECTED BY: A. PURGASON
 ENI #: 950919-03-A
 ANALYZED BY: ENI

DATE COLLECTED: 09/14/95
 DATE RECEIVED: 09/19/95
 TCLP EXTRACTED: 09/20-21/95
 DATE ANALYZED: 09/21, 22/95

TCLP METALS

SAMPLE ID: RO-2078

<u>ELEMENT</u>	<u>NDL (mg/l)</u>	<u>RESULT (mg/l)</u>
Arsenic	0.025	BDL
Barium	0.02	1.21
Cadmium	0.025	BDL
Chromium	0.025	0.06
Lead	0.025	BDL
Mercury	0.001	0.001
Nickel	0.050	0.10
Selenium	0.025	BDL
Silver	0.025	BDL

MATRIX: NON-AQUEOUS

NDL - Method Detection Limit
 BDL - Below Detection Limit

Method: Mercury - EPA 245.1
 Nickel - EPA 249.1
 Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer

Sheq Ketrar

Lab Manager

M. Burt



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CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
 PO BOX 6434
 HIGH POINT, NC 27262

REPORT DATE: 09/25/95
 PROJECT #: 716.4
 SITE ID: FMA
 COLLECTED BY: A. PURGASON
 EMI #: 950919-03-B
 ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
 DATE RECEIVED: 09/19/95
 TCLP EXTRACTED: 09/20-21/95
 DATE ANALYZED: 09/21,22/95

TCLP METALS

SAMPLE ID: RO-6028

<u>ELEMENT</u>	<u>MDL (mg/l)</u>	<u>RESULT (mg/l)</u>
Arsenic	0.025	BDL
Barium	0.02	0.94
Cadmium	0.025	BDL
Chromium	0.025	0.21
Lead	0.025	0.096
Mercury	0.001	0.001
Nickel	0.050	0.72
Selenium	0.025	BDL
Silver	0.025	BDL

MATRIX: NON-AQUEOUS

MDL - Method Detection Limit
 BDL - Below Detection Limit

Method: Mercury - EPA 245.1
 Nickel - EPA 249.1
 Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer

Meg Ketchum

Lab Manager

M. B. B.



ENVIRONMENTAL MONITORING, INCORPORATED

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P.O. BOX 1477 ▲ COEBURN, VIRGINIA 24230 ▲ 703/395-3661

CERTIFICATE OF ANALYSIS

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PO BOX 6434
HIGH POINT, NC 27262

REPORT DATE: 09/25/95
PROJECT #: 716.4
SITE ID: FMA
COLLECTED BY: A. PURGASON
EMI #: 980919-03-C
ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
DATE RECEIVED: 09/19/95
TCLP EXTRACTED: 09/20-21/95
DATE ANALYZED: 09/21,22/95

TCLP METALS

SAMPLE ID: RO-704

Table with 3 columns: ELEMENT, MDL (mg/l), RESULT (mg/l). Rows include Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Nickel, Selenium, Silver.

MATRIX: NON-AQUEOUS

MDL - Method Detection Limit
BDL - Below Detection Limit

Method: Mercury - EPA 245.1
Nickel - EPA 249.1
Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer: [Signature]

Lab Manager: [Signature]



ENVIRONMENTAL MONITORING, INCORPORATED
ENVIRONMENTAL CONSULTANTS ▲ ANALYTICAL LABORATORIES
P.O. BOX 1477 ▲ COEBURN, VIRGINIA 24230 ▲ 703/395-3661

CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
PO BOX 6434
HIGH POINT, NC 27262

REPORT DATE: 09/25/95
PROJECT #: 716.4
SITE ID: FMA
COLLECTED BY: A. PURGASON
EMI #: 950919-03-D
ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
DATE RECEIVED: 09/19/95
TCLP EXTRACTED: 09/20-21/95
DATE ANALYZED: 09/21,22/95

TCLP METALS

SAMPLE ID: RO-6127

<u>ELEMENT</u>	<u>MDL (mg/l)</u>	<u>RESULT (mg/l)</u>
Arsenic	0.025	BDL
Barium	0.02	1.15
Cadmium	0.025	BDL
Chromium	0.025	3.34
Lead	0.025	BDL
Mercury	0.001	BDL
Nickel	0.050	0.89
Selenium	0.025	BDL
Silver	0.025	BDL

MATRIX: NON-AQUEOUS

MDL - Method Detection Limit
BDL - Below Detection Limit

Method: Mercury - EPA 245.1
Nickel - EPA 249.1
Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer: Shelley Kistner

Lab Manager: M. B. Smith



ENVIRONMENTAL MONITORING, INCORPORATED
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 P.O. BOX 1477 ▲ COEBURN, VIRGINIA 24230 ▲ 703/395-3661

CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
 PO BOX 6434
 HIGH POINT, NC 27262

REPORT DATE: 09/25/95
 PROJECT #: 716.4
 SITE ID: FMA
 COLLECTED BY: A. PURGASON
 EMI #: 950919-03-E
 ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
 DATE RECEIVED: 09/19/95
 TCLP EXTRACTED: 09/20-21/95
 DATE ANALYZED: 09/21,22/95

TCLP METALS

SAMPLE ID: RO-6130

<u>ELEMENT</u>	<u>MDL (mg/l)</u>	<u>RESULT (mg/l)</u>
Arsenic	0.025	BDL
Barium	0.02	0.88
Cadmium	0.025	BDL
Chromium	0.025	BDL
Lead	0.025	BDL
Mercury	0.001	0.002
Nickel	0.050	0.29
Selenium	0.025	BDL
Silver	0.025	BDL

MATRIX: NON-AQUEOUS

MDL - Method Detection Limit
 BDL - Below Detection Limit

Method: Mercury - EPA 245.1
 Nickel - EPA 249.1
 Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer

Shirley Ketchum

Lab Manager

M. B. Burt



ENVIRONMENTAL MONITORING, INCORPORATED
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P.O. BOX 1477 ▲ COEBURN, VIRGINIA 24230 ▲ 703/395-3661

CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
PO BOX 6434
HIGH POINT, NC 27262

REPORT DATE: 09/25/95
PROJECT #: 715.4
SITE ID: FMA
COLLECTED BY: A. PURGASON
EMI #: 950919-03-F
ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
DATE RECEIVED: 09/19/95
TCLP EXTRACTED: 09/20-21/95
DATE ANALYZED: 09/21,22/95

TCLP METALS

SAMPLE ID: RO-6118

<u>ELEMENT</u>	<u>MDL (mg/l)</u>	<u>RESULT (mg/l)</u>
Arsenic	0.025	BDL
Barium	0.02	1.01
Cadmium	0.025	BDL
Chromium	0.025	BDL
Lead	0.025	BDL
Mercury	0.001	BDL
Nickel	0.050	0.42
Selenium	0.025	BDL
Silver	0.025	BDL

MATRIX: NON-AQUEOUS

MDL - Method Detection Limit
BDL - Below Detection Limit

Method: Mercury - EPA 245.1
Nickel - EPA 249.1
Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer

Greg Ketchum

Lab Manager

M. B. Smith



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 P.O. BOX 1477 ▲ COEBURN, VIRGINIA 24230 ▲ 703/395-3661

CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
 PO BOX 6434
 HIGH POINT, NC 27262

REPORT DATE: 09/25/95
 PROJECT #: 716.4
 SITE ID: FNA
 COLLECTED BY: A. PURGASON
 EMI #: 950919-03-G
 ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
 DATE RECEIVED: 09/19/95
 TCLP EXTRACTED: 09/20-21/95
 DATE ANALYZED: 09/21,22/95

TCLP METALS

SAMPLE ID: RO-8013

<u>ELEMENT</u>	<u>MDL (mg/l)</u>	<u>RESULT (mg/l)</u>
Arsenic	0.025	BDL
Barium	0.02	0.77
Cadmium	0.025	BDL
Chromium	0.025	0.67
Lead	0.025	BDL
Mercury	0.001	BDL
Nickel	0.050	0.42
Selenium	0.025	BDL
Silver	0.025	BDL

MATRIX: NON-AQUEOUS

MDL - Method Detection Limit
 BDL - Below Detection Limit

Method: Mercury - EPA 245.1
 Nickel - EPA 249.1
 Other Metals - SW 846 (6010)



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CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
 PO BOX 6434
 HIGH POINT, NC 27262

REPORT DATE: 09/25/95
 PROJECT #: 716.4
 SITE ID: FMA
 COLLECTED BY: A. PURGASON
 EMI #: 950919-03-H
 ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
 DATE RECEIVED: 09/19/95
 TCLP EXTRACTED: 09/20-21/95
 DATE ANALYZED: 09/21,22/95

TCLP METALS

SAMPLE ID: RO-6106

<u>ELEMENT</u>	<u>MDL (mg/l)</u>	<u>RESULT (mg/l)</u>
Arsenic	0.025	BDL
Barium	0.02	0.87
Cadmium	0.025	BDL
Chromium	0.025	0.19
Lead	0.025	BDL
Mercury	0.001	BDL
Nickel	0.050	0.54
Selenium	0.025	BDL
Silver	0.025	BDL

MATRIX: NON-AQUEOUS

NDL - Method Detection Limit

BDL - Below Detection Limit

Method: Mercury - EPA 245.1
 Nickel - EPA 249.1
 Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer

Greg Ketchum

Lab Manager

M. B. Smith



ENVIRONMENTAL MONITORING, INCORPORATED
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CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
 PO BOX 6434
 HIGH POINT, NC 27262

REPORT DATE: 09/25/95
 PROJECT #: 716.4
 SITE ID: FMA
 COLLECTED BY: A. PURGASON
 EMI #: 950919-03-1
 ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
 DATE RECEIVED: 09/19/95
 TCLP EXTRACTED: 09/20-21/95
 DATE ANALYZED: 09/21.22/95

TCLP METALS

SAMPLE ID: RO-6060

<u>ELEMENT</u>	<u>MDL (mg/l)</u>	<u>RESULT (mg/l)</u>
Arsenic	0.025	BDL
Barium	0.02	0.93
Cadmium	0.025	BDL
Chromium	0.025	0.06
Lead	0.025	0.03
Mercury	0.001	BDL
Nickel	0.050	0.73
Selenium	0.025	BDL
Silver	0.025	BDL

MATRIX: NON-AQUEOUS

MDL - Method Detection Limit
 BDL - Below Detection Limit

Method: Mercury - EPA 245.1
 Nickel - EPA 249.1
 Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer

Shaq Kehan

Lab Manager

M. [Signature]



ENVIRONMENTAL MONITORING, INCORPORATED
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 P.O. BOX 1477 ▲ COEBURN, VIRGINIA 24230 ▲ 703/395-3661

CERTIFICATE OF ANALYSIS

ENVIRONMENTAL MANAGEMENT SOLUTIONS
 PO BOX 6434
 HIGH POINT, NC 27262

REPORT DATE: 09/25/95
 PROJECT #: 716.4
 SITE ID: FMA
 COLLECTED BY: A. PURGASON
 EMI #: 950919-03-A
 ANALYZED BY: EMI

DATE COLLECTED: 09/14/95
 DATE RECEIVED: 09/19/95
 TCLP EXTRACTED: 09/20-21/95
 DATE ANALYZED: 09/21,22/95

TCLP METALS

SAMPLE ID: RO-2078

<u>ELEMENT</u>	<u>MDL (mg/l)</u>	<u>RESULT (mg/l)</u>
Arsenic	0.025	BDL
Barium	0.02	1.21
Cadmium	0.025	BDL
Chromium	0.025	0.06
Lead	0.025	BDL
Mercury	0.001	0.001
Nickel	0.050	0.10
Selenium	0.025	BDL
Silver	0.025	BDL

MATRIX: NON-AQUEOUS

MDL - Method Detection Limit
 BDL - Below Detection Limit

Method: Mercury - EPA 245.1
 Nickel - EPA 249.1
 Other Metals - SW 846 (6010)

To the best of my knowledge and belief the above results were obtained by accepted analytical procedures and are submitted for Environmental Monitoring, Incorporated.

QA/QC Officer: Sheq Kettan

Lab Manager: M. Burt



PROFESSIONAL SERVICES

SAMPLE LOG SHEET & CHAIN OF CUSTODY

DATE RECEIVED LAB: 9/14/95
DATE ANALYSIS DUE: _____

CUSTOMER INFORMATION

CLIENT: E.M.S. BILLING ADDRESS: P.O. Box 6434
CONTACT: Andy Purgason/David Conarty CITY: High Point

STATE/ZIP N.C. 27262
PHONE (910) 869-8836
FAX (910) 869-8704
Purchase Order No. _____

SAMPLES WILL BE DISPOSED OF IN ACCORDANCE WITH EMI'S TERMS & CONDITIONS

ENVIRONMENTAL MONITORING, INCORPORATED
ENVIRONMENTAL CONSULTANTS & ANALYTICAL LABORATORIES
10817 NORTON-COEBURN ROAD & COEBURN, VIRGINIA 24230 & 703/395-3661

COLLECTED BY (print) Andy Purgason
COLLECTOR(S) SIGNATURE(S) [Signature]
TURN-AROUND (circle): 24-hr 48-hr 72-hr One Week (5 Working Days) Regular (10 Working Days) Regular TCLP

PRIORITY SERVICE APPROVED BY: _____
SITE ID: FABRIC MARKETING ASSOCIATES (FMA)
DATE LOGGED: _____ VERBAL RESULTS DUE: _____
EMI PROJECT NO.: 716.4 CLIENT NO.: _____
EMI PROJECT MANAGER: KJA

PARAMETER (ANALYSIS REQUESTED)			PRESERVATIVE																	
TCLP 6 METALS AND NICKEL	TOTAL CHLORINE	TOTAL CHLORINE																		

EMI SAMPLE #	CUSTOMER SAMPLE IDENTIFICATION	DATE COLLECTED	TIME COLLECTED	SAMPLE MATRIX	No. of COREMERS															REMARKS
1	RD 2078	9/14/95	8:00	Soil	1	X	X	X												
2	RD 6028	9/14/95	8:15	Soil	1	X	X	X												
3	RD 704	9/14/95	8:30	Soil	1	X	X	X												
4	RD 6127	9/14/95	8:45	Soil	1	X	X	X												
5	RD 6130	9/14/95	9:00	Soil	1	X	X	X												
6	RD 6118	9/14/95	9:15	Soil	1	X	X	X												
7	RD 8013	9/14/95	9:30	Soil	1	X	X	X												
8	RD 6106	9/14/95	9:35	Soil	1	X	X	X												
9	RD 6060	9/14/95	9:45	Soil	1	X	X	X												
10																				
11																				

Relinquished by (sign) <u>[Signature]</u>	Date/Time <u>9/14/95 2:00pm</u>	Received By (sign) <u>[Signature]</u>	Date/Time <u>9/14/95 1545</u>
Relinquished by (sign)	Date/Time	Received By (sign)	Date/Time
Relinquished by (sign)	Date/Time	Received By (sign)	Date/Time

Report to be sent (if different than customer information):
NAME: _____
ADDRESS: _____
CITY: _____
STATE/ZIP: _____ FAX: _____

METHOD OF SHIPMENT TO LAB (circle): UPS US MAIL FED. EX. EMI FR. RMP PERSONAL DELIVERY OTHER
CONDITION OF RECEIPT BY LAB: IN

09/26/95 15:28 ENVIRONMENTAL MONITORING, INC.



ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road • Memphis, TN 38111 • (901) 327-2750 • FAX (901) 327-6334

Founded 1972

September 22, 1995

Mr. Bruce Braswell
Terra Technologies Group, P.A
1603 Bolingbroke Rd.
Highpoint, NC 27265

Ref: Analytical Testing
ETC Order # 9509116
Project Description Special

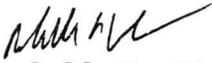
The above referenced project has been analyzed per your instructions. The analyses were performed in our laboratory in accordance with Standard Methods 17th/18th Edition; The Solid Waste Manual SW-846; EPA Methods for the Analysis of Water and Wastes and/or 40 CFR part 136. Some analyses may have been sub-contracted to an outside testing laboratory. The results are shown on the attached analysis sheet(s).

Within the attached report, some analyte data may be reported as "Qualified" data indicated by a "Data Flag" next to the result. The following summarizes the possible "Data Flags" that may be associated with this data :

- Q - Surrogate recovery outside QC Limits.
- j - Estimated Value. Presence of the compound was confirmed but less than the sample quantitation limit but greater than zero.
- E - Concentration exceeds the established method calibration range but is within the working range of the instrument.
- B - Analyte detected in blank.
- S - Associated Surrogate Recovery outside QC Limits
- N - Non-Compliance Report associated with this sample or project indicating standard protocol was not followed. Please refer to attached report.

Please do not hesitate to contact our office if you have any questions.

Sincerely,


Randall H. Thomas
Vice-President
General Manager

rt
Attachment

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

INORGANIC ANALYSIS DATA SHEETClient Name **Terra Technologies Group, P.A** Project #**1603 Bolingbroke Rd.
Highpoint, NC 27265**Site ID **Special**

Date Arrived 09/07/95

ETC Order Number 9509116

ETC Lab ID 9509116-07

Sample ID: G

Matrix :SOLID

Sample Date :09/06/95

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Total Cyanide	15.5	mg/Kg	0.500	1100	09/18/95 PM	9010A
Silver	<1.75	mg/Kg	1.75	1809	09/18/95 SH	6010A
Arsenic	<12.5	mg/Kg	12.5	1809	09/18/95 SH	6010A
Barium	54.7	mg/Kg	0.500	1809	09/18/95 SH	6010A
Cadmium	<1.00	mg/Kg	1.00	1809	09/18/95 SH	6010A
Chromium	15.2	mg/Kg	1.75	1809	09/18/95 SH	6010A
Mercury	<0.020	mg/Kg	0.020	0900	09/21/95 JF	7471
Lead	<11.3	mg/Kg	11.3	1809	09/18/95 SH	6010A
Selenium	<18.8	mg/Kg	18.8	1809	09/18/95 SH	6010A

ETC Lab ID 9509116-08

Sample ID: H

Matrix :SOLID

Sample Date :09/06/95

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Total Cyanide	44.2	mg/Kg	0.500	1100	09/18/95 PM	9010A
Silver	<1.75	mg/Kg	1.75	1809	09/18/95 SH	6010A
Arsenic	<12.5	mg/Kg	12.5	1809	09/18/95 SH	6010A
Barium	43.5	mg/Kg	0.500	1809	09/18/95 SH	6010A
Cadmium	1.48	mg/Kg	1.00	1809	09/18/95 SH	6010A
Chromium	19.9	mg/Kg	1.75	1809	09/18/95 SH	6010A
Mercury	<0.020	mg/Kg	0.020	0900	09/21/95 JF	7471
Lead	<11.3	mg/Kg	11.3	1809	09/18/95 SH	6010A
Selenium	<18.8	mg/Kg	18.8	1809	09/18/95 SH	6010A


LABORATORY MANAGER

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

INORGANIC ANALYSIS DATA SHEET

Client Name **Terra Technologies Group, P.A** Project #

**1603 Bolingbroke Rd.
Highpoint, NC 27265**

Site ID **Special**

Date Arrived **09/07/95**
ETC Order Number **9509116**

ETC Lab ID **9509116-01**
Sample ID: A

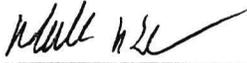
Matrix : **SOLID**
Sample Date : **09/06/95**

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Total Cyanide	4.86	mg/Kg	0.500	1100	09/18/95 PM	9010A
Silver	<1.75	mg/Kg	1.75	1809	09/18/95 SH	6010A
Arsenic	<12.5	mg/Kg	12.5	1809	09/18/95 SH	6010A
Barium	43.3	mg/Kg	0.500	1809	09/18/95 SH	6010A
Cadmium	1.23	mg/Kg	1.00	1809	09/18/95 SH	6010A
Chromium	3,500	mg/Kg	1.75	1809	09/18/95 SH	6010A
Mercury	<0.020	mg/Kg	0.020	0900	09/21/95 JF	7471
Lead	314	mg/Kg	11.3	1809	09/18/95 SH	6010A
Selenium	<18.8	mg/Kg	18.8	1809	09/18/95 SH	6010A

ETC Lab ID **9509116-02**
Sample ID: B

Matrix : **SOLID**
Sample Date : **09/06/95**

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Total Cyanide	916	mg/Kg	0.500	1100	09/18/95 PM	9010A
Silver	<1.75	mg/Kg	1.75	1809	09/18/95 SH	6010A
Arsenic	<12.5	mg/Kg	12.5	1809	09/18/95 SH	6010A
Barium	35.1	mg/Kg	0.500	1809	09/18/95 SH	6010A
Cadmium	<1.00	mg/Kg	1.00	1809	09/18/95 SH	6010A
Chromium	21.8	mg/Kg	1.75	1809	09/18/95 SH	6010A
Mercury	<0.020	mg/Kg	0.020	0900	09/21/95 JF	7471
Lead	<11.3	mg/Kg	11.3	1809	09/18/95 SH	6010A
Selenium	<18.8	mg/Kg	18.8	1809	09/18/95 SH	6010A


LABORATORY MANAGER

ENVIRONMENTAL TESTING & CONSULTING, INC.
 2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750
INORGANIC ANALYSIS DATA SHEET

Client Name **Terra Technologies Group, P.A** Project #

**1603 Bolingbroke Rd.
 Highpoint, NC 27265**

Site ID **Special**

Date Arrived 09/07/95
 ETC Order Number 9509116
 ETC Lab ID 9509116-03

Matrix :SOLID
 Sample Date :09/06/95

Sample ID: C

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Total Cyanide	169	mg/Kg	0.500	1100	09/18/95 PM	9010A
Silver	<1.75	mg/Kg	1.75	1809	09/18/95 SH	6010A
Arsenic	<12.5	mg/Kg	12.5	1809	09/18/95 SH	6010A
Barium	35.4	mg/Kg	0.500	1809	09/18/95 SH	6010A
Cadmium	2.09	mg/Kg	1.00	1809	09/18/95 SH	6010A
Chromium	59.8	mg/Kg	1.75	1809	09/18/95 SH	6010A
Mercury	<0.020	mg/Kg	0.020	0900	09/21/95 JF	7471
Lead	<11.3	mg/Kg	11.3	1809	09/18/95 SH	6010A
Selenium	<18.8	mg/Kg	18.8	1809	09/18/95 SH	6010A

ETC Lab ID 9509116-04
Sample ID: D

Matrix :SOLID
 Sample Date :09/06/95

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Total Cyanide	53.9	mg/Kg	0.500	1100	09/18/95 PM	9010A
Silver	<1.75	mg/Kg	1.75	1809	09/18/95 SH	6010A
Arsenic	<12.5	mg/Kg	12.5	1809	09/18/95 SH	6010A
Barium	29.7	mg/Kg	0.500	1809	09/18/95 SH	6010A
Cadmium	<1.00	mg/Kg	1.00	1809	09/18/95 SH	6010A
Chromium	45.3	mg/Kg	1.75	1809	09/18/95 SH	6010A
Mercury	<0.020	mg/Kg	0.020	0900	09/21/95 JF	7471
Lead	<11.3	mg/Kg	11.3	1809	09/18/95 SH	6010A
Selenium	<18.8	mg/Kg	18.8	1809	09/18/95 SH	6010A


 LABORATORY MANAGER

ENVIRONMENTAL TESTING & CONSULTING, INC.
 2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750
INORGANIC ANALYSIS DATA SHEET

Client Name **Terra Technologies Group, P.A** Project #

**1603 Bolingbroke Rd.
 Highpoint, NC 27265**

Site ID **Special**

Date Arrived **09/07/95**

ETC Order Number **9509116**

ETC Lab ID **9509116-05**

Sample ID: E

Matrix : **SOLID**

Sample Date : **09/06/95**

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED	BY	METHOD
Total Cyanide	76.4	mg/Kg	0.500	1100	09/18/95	PM	9010A
Silver	<1.75	mg/Kg	1.75	1809	09/18/95	SH	6010A
Arsenic	<12.5	mg/Kg	12.5	1809	09/18/95	SH	6010A
Barium	42.0	mg/Kg	0.500	1809	09/18/95	SH	6010A
Cadmium	<1.00	mg/Kg	1.00	1809	09/18/95	SH	6010A
Chromium	16.0	mg/Kg	1.75	1809	09/18/95	SH	6010A
Mercury	<0.020	mg/Kg	0.020	0900	09/21/95	JF	7471
Lead	<11.3	mg/Kg	11.3	1809	09/18/95	SH	6010A
Selenium	<18.8	mg/Kg	18.8	1809	09/18/95	SH	6010A

ETC Lab ID **9509116-06**

Sample ID: F

Matrix : **SOLID**

Sample Date : **09/06/95**

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED	BY	METHOD
Total Cyanide	290	mg/Kg	0.500	1100	09/18/95	PM	9010A
Silver	<1.75	mg/Kg	1.75	1809	09/18/95	SH	6010A
Arsenic	<12.5	mg/Kg	12.5	1809	09/18/95	SH	6010A
Barium	31.6	mg/Kg	0.500	1809	09/18/95	SH	6010A
Cadmium	<1.00	mg/Kg	1.00	1809	09/18/95	SH	6010A
Chromium	12.0	mg/Kg	1.75	1809	09/18/95	SH	6010A
Mercury	<0.020	mg/Kg	0.020	0900	09/21/95	JF	7471
Lead	<11.3	mg/Kg	11.3	1809	09/18/95	SH	6010A
Selenium	<18.8	mg/Kg	18.8	1809	09/18/95	SH	6010A

Robert H. X
LABORATORY MANAGER

ENVIRONMENTAL TESTING & CONSULTING, INC.

2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750

ORGANIC ANALYSIS DATA SHEETClient Name **Terra Technologies Group, P.A**

Project #

FID #

**1603 Bolingbroke Rd.
Highpoint, NC 27265**Site ID **Special**Date Arrived **09/07/95**ETC Order Number **9509116**ETC Lab ID **9509116-05**Matrix : **SOLID****Sample ID: E**Sample Date : **09/06/95**

TEST	RESULT	REGULATORY		DATE	DATE	
	UNITS: (mg/L)	DL	LEVEL: (mg/L)	ANALYZED	BY	METHOD
Arsenic - TCLP	<0.250	0.250	5.0	09/14/95	SH	6010A
Barium - TCLP	0.225	0.010	100	09/14/95	SH	6010A
Cadmium - TCLP	<0.020	0.020	1.0	09/14/95	SH	6010A
Chromium - TCLP	0.065	0.035	5.0	09/14/95	SH	6010A
Lead - TCLP	<0.225	0.225	5.0	09/14/95	SH	6010A
Mercury - TCLP	<0.001	0.001	0.2	09/12/95	JF	7470
Selenium - TCLP	<0.375	0.375	1.0	09/14/95	SH	6010A
Silver - TCLP	<0.035	0.035	5.0	09/14/95	SH	6010A
TCLP Extraction	Leachate			09/07/95	TL	1311

ETC Lab ID **9509116-06**Matrix : **SOLID****Sample ID: F**Sample Date : **09/06/95**

TEST	RESULT	REGULATORY		DATE	DATE	
	UNITS: (mg/L)	DL	LEVEL: (mg/L)	ANALYZED	BY	METHOD
Arsenic - TCLP	<0.250	0.250	5.0	09/14/95	SH	6010A
Barium - TCLP	0.420	0.010	100	09/14/95	SH	6010A
Cadmium - TCLP	<0.020	0.020	1.0	09/14/95	SH	6010A
Chromium - TCLP	0.115	0.035	5.0	09/14/95	SH	6010A
Lead - TCLP	<0.225	0.225	5.0	09/14/95	SH	6010A
Mercury - TCLP	<0.001	0.001	0.2	09/12/95	JF	7470
Selenium - TCLP	<0.375	0.375	1.0	09/14/95	SH	6010A
Silver - TCLP	<0.035	0.035	5.0	09/14/95	SH	6010A
TCLP Extraction	Leachate			09/07/95	TL	1311

DL - Detection Limit


LABORATORY MANAGER

ENVIRONMENTAL TESTING & CONSULTING, INC.
 2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750
ORGANIC ANALYSIS DATA SHEET

Client Name **Terra Technologies Group, P.A**
1603 Bolingbroke Rd.
Highpoint, NC 27265

Project #
 FID #

Site ID **Special**

Date Arrived 09/07/95
 ETC Order Number 9509116

ETC Lab ID **9509116-01**
Sample ID: A

Matrix :SOLID
 Sample Date :09/06/95

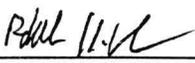
TEST	RESULT UNITS: (mg/L)	DL	REGULATORY LEVEL: (mg/L)	DATE ANALYZED	BY	METHOD
Arsenic - TCLP	<0.250	0.250	5.0	09/14/95	SH	6010A
Barium - TCLP	0.140	0.010	100	09/14/95	SH	6010A
Cadmium - TCLP	<0.020	0.020	1.0	09/14/95	SH	6010A
Chromium - TCLP	153	0.035	5.0	09/14/95	SH	6010A
Lead - TCLP	<0.225	0.225	5.0	09/14/95	SH	6010A
Mercury - TCLP	<0.001	0.001	0.2	09/12/95	JF	7470
Selenium - TCLP	<0.375	0.375	1.0	09/14/95	SH	6010A
Silver - TCLP	<0.035	0.035	5.0	09/14/95	SH	6010A
TCLP Extraction	Leachate			09/07/95	TL	1311

ETC Lab ID **9509116-02**
Sample ID: B

Matrix :SOLID
 Sample Date :09/06/95

TEST	RESULT UNITS: (mg/L)	DL	REGULATORY LEVEL: (mg/L)	DATE ANALYZED	BY	METHOD
Arsenic - TCLP	<0.250	0.250	5.0	09/14/95	SH	6010A
Barium - TCLP	0.390	0.010	100	09/14/95	SH	6010A
Cadmium - TCLP	<0.020	0.020	1.0	09/14/95	SH	6010A
Chromium - TCLP	0.190	0.035	5.0	09/14/95	SH	6010A
Lead - TCLP	<0.225	0.225	5.0	09/14/95	SH	6010A
Mercury - TCLP	<0.001	0.001	0.2	09/12/95	JF	7470
Selenium - TCLP	<0.375	0.375	1.0	09/14/95	SH	6010A
Silver - TCLP	<0.035	0.035	5.0	09/14/95	SH	6010A
TCLP Extraction	Leachate			09/07/95	TL	1311

DL - Detection Limit


 LABORATORY MANAGER

ENVIRONMENTAL TESTING & CONSULTING, INC.
 2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750
ORGANIC ANALYSIS DATA SHEET

Client Name **Terra Technologies Group, P.A**

Project #

1603 Bolingbroke Rd.
 Highpoint, NC 27265

FID #

Site ID **Special**

Date Arrived 09/07/95

ETC Order Number 9509116

ETC Lab ID **9509116-07**

Sample ID: G

Matrix :SOLID

Sample Date :09/06/95

TEST	RESULT UNITS: (mg/L)	DL	REGULATORY LEVEL: (mg/L)	DATE ANALYZED	BY	METHOD
Arsenic - TCLP	<0.250	0.250	5.0	09/14/95	SH	6010A
Barium - TCLP	0.450	0.010	100	09/14/95	SH	6010A
Cadmium - TCLP	<0.020	0.020	1.0	09/14/95	SH	6010A
Chromium - TCLP	0.050	0.035	5.0	09/14/95	SH	6010A
Lead - TCLP	<0.225	0.225	5.0	09/14/95	SH	6010A
Mercury - TCLP	<0.001	0.001	0.2	09/12/95	JF	7470
Selenium - TCLP	<0.375	0.375	1.0	09/14/95	SH	6010A
Silver - TCLP	<0.035	0.035	5.0	09/14/95	SH	6010A
TCLP Extraction	Leachate			09/07/95	TL	1311

ETC Lab ID **9509116-08**

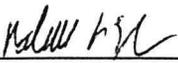
Sample ID: H

Matrix :SOLID

Sample Date :09/06/95

TEST	RESULT UNITS: (mg/L)	DL	REGULATORY LEVEL: (mg/L)	DATE ANALYZED	BY	METHOD
Arsenic - TCLP	<0.250	0.250	5.0	09/14/95	SH	6010A
Barium - TCLP	0.315	0.010	100	09/14/95	SH	6010A
Cadmium - TCLP	<0.020	0.020	1.0	09/14/95	SH	6010A
Chromium - TCLP	0.095	0.035	5.0	09/14/95	SH	6010A
Lead - TCLP	<0.225	0.225	5.0	09/14/95	SH	6010A
Mercury - TCLP	<0.001	0.001	0.2	09/12/95	JF	7470
Selenium - TCLP	<0.375	0.375	1.0	09/14/95	SH	6010A
Silver - TCLP	<0.035	0.035	5.0	09/14/95	SH	6010A
TCLP Extraction	Leachate			09/07/95	TL	1311

DL - Detection Limit



 LABORATORY MANAGER

ENVIRONMENTAL TESTING & CONSULTING, INC.
 2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750
ORGANIC ANALYSIS DATA SHEET

Client Name **Terra Technologies Group, P.A**
 1603 Bolingbroke Rd.
 Highpoint, NC 27265

Project #
 FID #

Site ID Special

Date Arrived 09/07/95
 ETC Order Number 9509116
 ETC Lab ID 9509116-03
Sample ID: C

Matrix :SOLID
 Sample Date :09/06/95

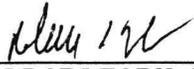
TEST	RESULT UNITS: (mg/L)	DL	REGULATORY LEVEL: (mg/L)	DATE ANALYZED	BY	METHOD
Arsenic - TCLP	<0.250	0.250	5.0	09/14/95	SH	6010A
Barium - TCLP	0.225	0.010	100	09/14/95	SH	6010A
Cadmium - TCLP	<0.020	0.020	1.0	09/14/95	SH	6010A
Chromium - TCLP	0.710	0.035	5.0	09/14/95	SH	6010A
Lead - TCLP	<0.225	0.225	5.0	09/14/95	SH	6010A
Mercury - TCLP	<0.001	0.001	0.2	09/12/95	JF	7470
Selenium - TCLP	<0.375	0.375	1.0	09/14/95	SH	6010A
Silver - TCLP	<0.035	0.035	5.0	09/14/95	SH	6010A
TCLP Extraction	Leachate			09/07/95	TL	1311

ETC Lab ID 9509116-04
Sample ID: D

Matrix :SOLID
 Sample Date :09/06/95

TEST	RESULT UNITS: (mg/L)	DL	REGULATORY LEVEL: (mg/L)	DATE ANALYZED	BY	METHOD
Arsenic - TCLP	<0.250	0.250	5.0	09/14/95	SH	6010A
Barium - TCLP	0.135	0.010	100	09/14/95	SH	6010A
Cadmium - TCLP	<0.020	0.020	1.0	09/14/95	SH	6010A
Chromium - TCLP	0.145	0.035	5.0	09/14/95	SH	6010A
Lead - TCLP	<0.225	0.225	5.0	09/14/95	SH	6010A
Mercury - TCLP	<0.001	0.001	0.2	09/12/95	JF	7470
Selenium - TCLP	<0.375	0.375	1.0	09/14/95	SH	6010A
Silver - TCLP	<0.035	0.035	5.0	09/14/95	SH	6010A
TCLP Extraction	Leachate			09/07/95	TL	1311

DL - Detection Limit


 LABORATORY MANAGER



North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
Phillip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

5 August 1985

Ms. Denise Bland
EPA NC CERCLA Project Officer
Air and Hazardous Material Division
345 Courtland Street, N.E.
Atlanta, GA 30365

Subject: Final Preliminary Assessment Report
Metal Plating and Fabricating, Inc.
NC D053486395
High Point, NC 27263

Dear Ms. Bland:

Enclosed please find the Preliminary Assessment report for the subject site. This priority is based on our review of available data, and, sometimes, on conversations and correspondence with the site owner and operator. We have concluded that:

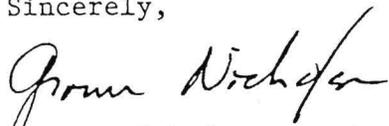
- A. Industrial operations first began on this site in 1971 when Metal Plating and Fabricating Inc. built and occupied the buildings. The company is and has been, owned by Robert R. Hilton of Thomasville, NC. The company has been engaged in fabricating and electroplating metal furniture from 1971 until the present.
- B. The hazardous wastes generated is, and has been, sludges containing nickel, copper, and chromium. These sludges are residues from the treatment of rinsewater from the electroplating operations. The treated water has always been released to the High Point sewer system. The sludges have never been disposed of, but remain in the in-ground treatment tanks. Sludges are generated at the rate of about 200 pounds per month.
- C. There are no apparent hazardous conditions. However, past practices are not well documented and sludge spillage may have occurred on-site. If no sludge has been removed, about 33,000 pounds are present in the treatment tanks.
- D. Groundwater is the route for contamination to move off-site.

- E. The site is located in the southern portion of High Point, which uses surface water as its water supply. The site lies adjacent to an intermittent stream which flows southward into an unnamed lake. There are residences close to the site, but no known wildlife refuges.
- F. Because of the possible threat to groundwater, but not to surface water users, a Low priority for inspection is recommended for this site.

On 1 August 1985, the subject site was reviewed by Jerry Rhodes, Assistant Branch Head, Solid and Hazardous Waste Management Branch, NC Department of Human Resources; by CERCLA Unit personnel; and by the following representatives from the North Carolina Department of Natural Resources and Community Development, Division of Environmental Management: Faye Sweat, Groundwater Section; and Glen Ross, Air Quality Section.

If you have any questions, please call me at (919) 733-2178.

Sincerely,



Grover Nicholson, Geologist
Solid and Hazardous Waste Management Branch
Environmental Health Section

GN/tb/0186



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE NC 02 SITE NUMBER D053486395

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 A. GROUNDWATER CONTAMINATION 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Sludge or liquid wastes may have escaped from the in-ground tanks and contaminated the groundwater.

01 B. SURFACE WATER CONTAMINATION 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 C. CONTAMINATION OF AIR 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 D. FIRE/EXPLOSIVE CONDITIONS 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 E. DIRECT CONTACT 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 F. CONTAMINATION OF SOIL 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ (Acres) 04 NARRATIVE DESCRIPTION

Sludge or liquid wastes may have escaped from the in-ground tanks and contaminated the soil.

01 G. DRINKING WATER CONTAMINATION 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 H. WORKER EXPOSURE/INJURY 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 I. POPULATION EXPOSURE/INJURY 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS *(Continued)*

01 J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____)

POTENTIAL ALLEGED

01 K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION *(Include name(s) of species)*

02 OBSERVED (DATE: _____)

POTENTIAL ALLEGED

01 L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____)

POTENTIAL ALLEGED

01 M. UNSTABLE CONTAINMENT OF WASTES
(Spills/runoff/standing liquids/leaking drums)
03 POPULATION POTENTIALLY AFFECTED: _____

02 OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED

01 N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____)

POTENTIAL ALLEGED

01 O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____)

POTENTIAL ALLEGED

01 P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____)

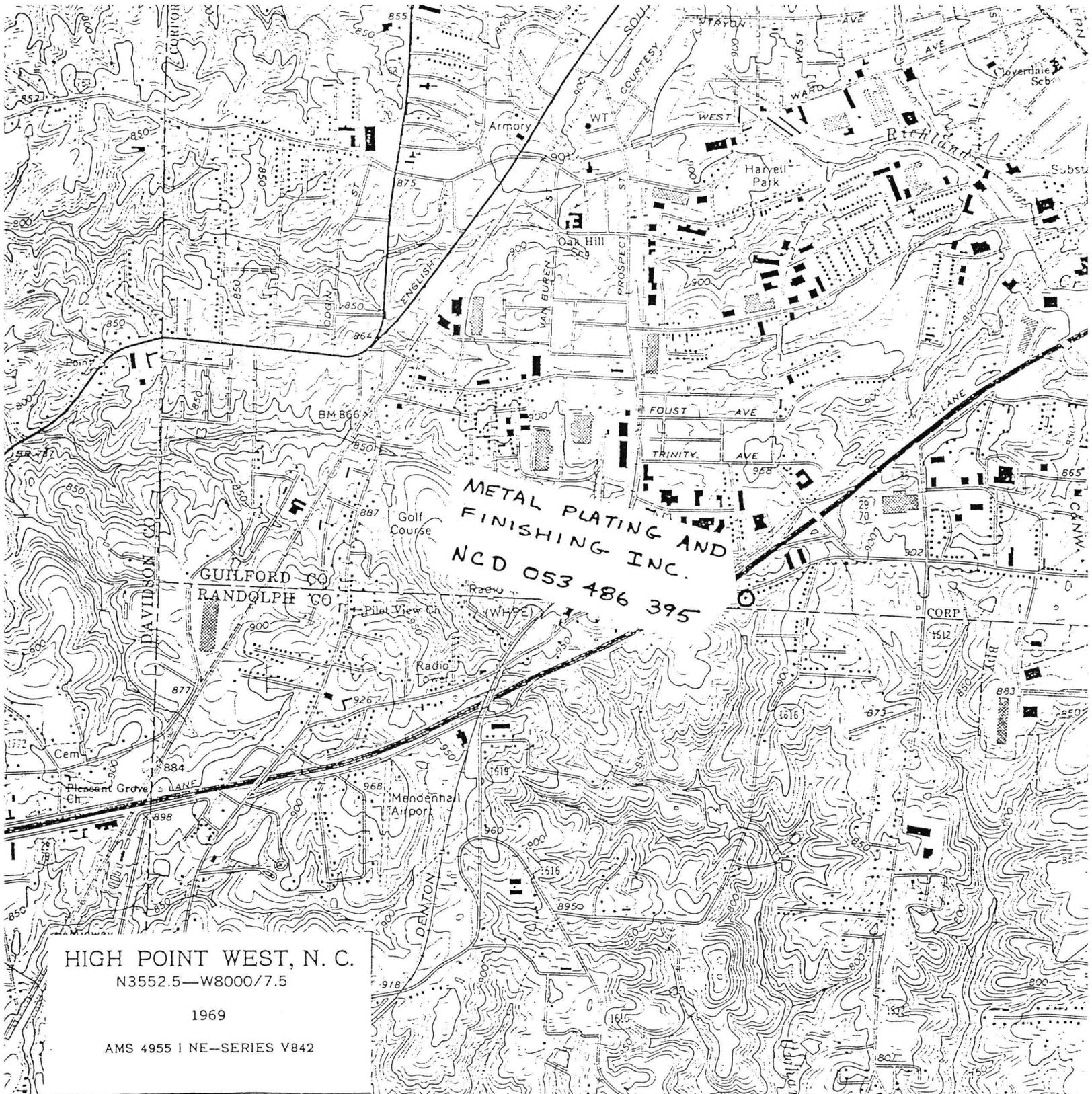
POTENTIAL ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION *(Cite specific references, e. g., state files, sample analysis, reports)*

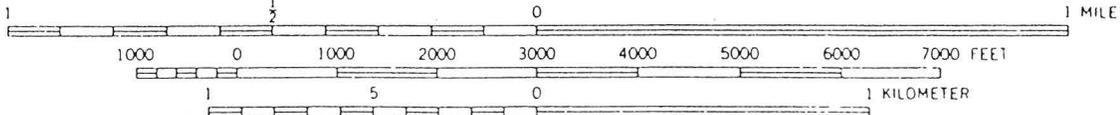


HIGH POINT WEST, N. C.
 N3552.5—W8000/7.5

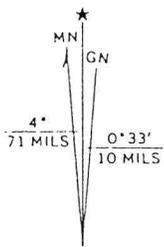
1969

AMS 4955 I NE—SERIES V842

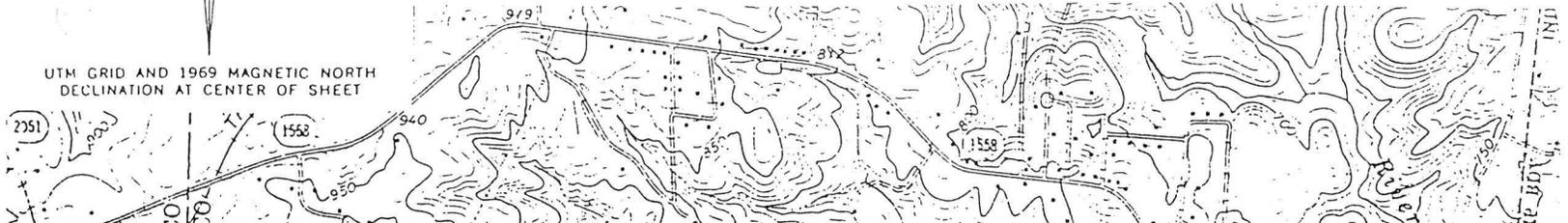
SCALE 1:24 000



CONTOUR INTERVAL 10 FEET
 DATUM IS MEAN SEA LEVEL



UTM GRID AND 1969 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET



WASTEWATER DISCHARGE PERMIT

WATER AND SEWER
DEPARTMENT



INDUSTRIAL
WASTE PROGRAM

P.O. Box 230 / High Point, N.C. 27261

Central Laboratory Services
(919) 882-8173

In compliance with Section 8 of High Point City Code, North Carolina General Statute 143-215.1 and other lawful standards and regulations adopted by the City of High Point and the North Carolina Environmental Management Commission,

METAL PLATING & FABRICATING CO. is hereby issued Permit No. 0032

and authorized to discharge from a facility located at

1539 WEST FAIRFIELD ROAD
P.O. BOX 1371
HIGH POINT, NC 27263

into the High Point sanitary sewer system which conveys wastewater to the Westside Treatment Plant and ultimately to Richfork Creek pursuant to NPDES Permit No. NC0024228. This discharge shall be in accordance with the Process Description, Effluent Limits, Schedule of Compliance, Monitoring and Reporting and other Conditions set forth in Parts I through VI of this Permit.

This Permit shall become effective on OCTOBER 1, 1987

This Permit and the authorization to discharge shall expire at midnight on SEPTEMBER 30, 1992

A handwritten signature in cursive script, reading "Linwood E. O'Neal".

Linwood E. O'Neal, P.E.
Director of Water and Sewer Utilities
High Point, North Carolina

9-24-87

Date

PART I DESCRIPTION AND LOCATION OF DISCHARGE

- A. Pipe 001 - Metal Plating and Fabricating eletroplates nickels, chromium, and brass on tubular steel. Metal Finishing/Pretreatment Standards for Existing Sources (PSES), 40 CFR, Part 413, Subpart A are applicable. The wastewater consist or rinse water from the alkaline and acid cleaning tanks and the plating operation. Wastewater is pretreated before being discharged to the sanitary sewer. Pretreatment consist of Cyanide destruct, chemical precipitation and clarification. There is no domestic wastewater in this effluent flow stream.
- B. Pipe 001 - Process wastewater generated at this facility enters the sanitary sewer through overflow drains in the rinse tanks in the plating department. The wastewater exits the south side of the building where the pretreatment equipment is located. After passing through chemical precipitation and clarification the wastewater turns 90° to the east before passing through the monitoring facility. The primary device in the monitoring facility is a 90° V notch weir. This is the point where compliance monitoring shall be performed. Metal Plating & Fabricating has self monitoring equipment to include flow meter, automatic smapler, and recording pH meter. From the monitoring facility the wastewater turns 90° to the north and travels up the driveway to a standard manhole in West Fairfield Road where it enters the City of High Point's outfall.

COUNTY OF Guilford

EPA I.D.# NC0053486395

SMALL HAZARDOUS WASTE GENERATOR SURVEY

1. GENERAL INFORMATION:

Name of Facility: METAL PLATING & FABRICATING INC.
Facility Contact: Mr. ERNEST ARSENAULT. Phone: 431-7137
Facility Location: _____
Street: 1539 W. FAIRFIELD RD.
City: High Point Zip Code: 27261

2. NATURE OF BUSINESS: (Provide Brief Description)

FABRICATING AND PLATING OF FURNITURE PARTS

3. NATURE OF HAZARDOUS WASTES: (Provide Brief Explanation)

METALS FROM PLATING PROCESS - NONE MANIFESTED -
ALL WASTE GOING TO SEWER IS TREATED

4. DESCRIPTION OF HAZARDOUS WASTE:

A	B	C	D	E	F*	G*	H
Hazardous Waste #	Annual Quantity	Unit Meas.	Storage	Treatment	Transportation	Disposal	Manifest Available (Yes or No)
	0	0					

*Provide name, address and I.D. # of transporter and disposal site in comments.

5. COMMENTS:

NO WASTE MANIFESTED OUT.

6. DATE OF SURVEY: 1-13-88

By: [Signature] Department: Guilford Co.

(Instructions on Reverse)