

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
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Author(s) of Document: Jenny Patterson

Inspector Name: N/A

Suborganization:

County (if not on report): Guilford



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

John E. Skvarla, III
Secretary

August 28, 2014

Mr. George Lester II, CEO
The Lester Group
Post Office Drawer 4991
Martinsville, VA 24115

Subject: RCRA Subpart W Drip Pad Soil Sampling and Analysis
Fortress Wood Products
Greensboro, North Carolina
EPA ID # NCD 981 920 648

Dear Mr. Lester,

This office has reviewed the Letter Report submitted by KU Resources, Inc. describing the results of soil sampling performed beneath and adjacent to the RCRA Subpart W Drip Pad at the former Fortress Wood Products facility located at 1 Metals Drive in Greensboro, NC.

The sample results provided indicate that further removal and/or decontamination is required of the subsoils and soil adjacent to the drip pad in order to achieve generator closure with the standards for drip pads described in 40 CFR 265.445 as well as the generator closure standards described at 40 CFR 265.111 and 40 CFR 265.114. Specifically, sample results FW-01, FW-04, FW-05, FW-06, FW-07 are above the chromium soil screening level protective to groundwater. Also, sample results FW-02, FW-03, FW-04, FW-05, and FW-06 are above the arsenic screening level protective of groundwater. All sample results, FW-01 through FW-09, exceed the Preliminary Residential Health-Based Soil Remediation Goal for arsenic and hexavalent chromium.

The Hazardous Waste Section requires contaminated soil to be remediated to risk-based levels that protect both human health and the underlying groundwater, or site-specific background levels (whichever is the lower of the two clean-up levels) for each contaminant of concern. The facility must submit two copies of an Assessment and Clean-up Plan (ACP) for review that describes the actions necessary to define the extent of contamination and to remediate the contamination. Here is the link to the Generator Closure Guidelines for your reference:

http://portal.ncdenr.org/c/document_library/get_file?uuid=f6c03add-fe91-40d9-82ed-75f5d9e118e6&groupId=38361

Here is a link to the Preliminary Soil Remediation Goals (PSRG) Table:

http://portal.ncdenr.org/c/document_library/get_file?uuid=5539ecfb-739f-4345-9459-b514508135f1&groupId=38361

Please note that Doug Roberts has retired from the Hazardous Waste Section. The Eastern Region Compliance Branch Chemist, Harvi Cooper, has recently been assigned this project and will be the new contact for this project. Her email address is: Harvi.Cooper@ncdenr.gov and her phone number is 919-1979.

If you have any questions concerning this letter, please contact me at 336-767-0031.

Sincerely,

A handwritten signature in cursive script that reads "Jenny Patterson".

Jenny Patterson
Eastern Region Compliance Supervisor
Hazardous Waste Section

cc: Harvi Cooper
Central Files
David Kerschner, KU Resources

Good Afternoon,

Attached is the letter written in response to the Report Letter you submitted describing the results of soil sampling performed beneath and adjacent to the RCRA Subpart W Drip Pad at the former Fortress Wood Products facility located at 1 Metals Drive in Greensboro, NC.

The original hard copy has been mailed to Mr. Lester. I am very sorry for the delay in responding.

Please contact our Chemist, Harvi Cooper, who has recently been assigned this project for any technical questions. Her email is: Harvi.cooper@ncdenr.gov or by phone at (919)467-1979.

Any other questions or requests may be directed to me.

Thanks,
Jenny

Jenny Patterson
Eastern Region Compliance Supervisor
Hazardous Waste Section -Division of Waste Management
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