

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

Facility ID Number: NCD981920648

Facility Name: FORTRESS WOOD PRODUCTS, INC

Document Group: Closure (C)

Document Type: Correspondence (C)

File Description/Comments: Email response about NCDENR Response to Letter Report – RCRA Subpart W

Drip Pad Soil Sampling and Analysis

Date of Document: 9/4/2014

Author(s) of Document: David Kerschner

Inspector Name: N/A

Suborganization:

County (if not on report): Guilford

Patterson, Jenny

From: Dave Kerschner <dkerschner@kuresources.com>
Sent: Thursday, September 04, 2014 10:41 AM
To: Patterson, Jenny
Subject: RE: Response to Sample and Analysis for Fortress Wood Products

Jenny,

I've discussed this letter with my client, and wanted to get back to you. We are disappointed with the Department's position, and would like to continue discussions regarding our originally suggested approach that considers site redevelopment. I continue to believe that the closure of the RCRA Subpart W drip pad has been demonstrated, and that redevelopment activities can move forward in the absence of RCRA closure considerations.

From a technical standpoint, I do not believe that the sub-slab and surrounding soil samples are suggestive of a release from the Subpart W regulated unit. None of the individual soil samples displayed coincident elevated concentrations of all three constituents of interest (chromium, copper, and arsenic) that would be expected were there to be a release of the chromated copper arsenate wood preservative. Further, the absence of leachable chromium in the "worst case" soil samples indicates that the chromium present in soil is in the trivalent form, and not the hexavalent form. None of the chromium concentrations come close to the protection of groundwater PSRG for trivalent chromium. The arsenic concentrations in four of the nine samples are at or below the protection of groundwater PSRG, and slightly above that PSRG in a fifth sample. Of the remaining four samples, the highest arsenic concentration is less than 2X that PSRG.

Regarding site redevelopment, my client has advised me that serious discussions with a potential purchaser are continuing, and that this potential purchaser would intend to redevelop the site for industrial purposes.

I'd like to schedule a phone call to discuss the above, and the next step. I'm in the office the rest of this week, and (so far) all of next week.

Thanks,

Dave

David R. Kerschner, CPG
Principal
KU Resources, Inc.
22 South Linden Street
Duquesne, PA 15110
412-469-9331
412-469-9336 FAX
412-973-9723 Mobile
dkerschner@kuresources.com
www.kuresources.com

From: Patterson, Jenny [<mailto:jenny.patterson@ncdenr.gov>]
Sent: Thursday, August 28, 2014 6:20 PM
To: dkerschner@kuresources.com
Subject: Response to Sample and Analysis for Fortress Wood Products