

**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: Other (O)

File Description/Comments: Supplemental RCRA Subpart W Drip Pad Soil Sampling and Analysis

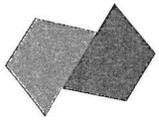
Date of Document: 2/26/2015

Author(s) of Document: David Kerschner

Inspector Name: N/A

Suborganization:

County (if not on report): Guilford



February 26, 2015

Harvi Cooper
NCDENR
Division of Waste Management
PO Box 4488
Cary, NC 27519



VIA EMAIL AND US MAIL

Subject: Supplemental RCRA Subpart W Drip Pad Soil Sampling and Analysis
Fortress Wood Products
Greensboro, North Carolina
ID No. NCD981920648

Dear Ms. Cooper:

In response to our telephone conversation of February 19, 2015, and on behalf of Fortress Wood Products, I have prepared the following soil sampling and analysis plan to further evaluate soil quality conditions beneath the RCRA Subpart W drip pad at the Fortress Greensboro facility, as well as to further evaluate background soil quality conditions at the facility.

The supplemental background soil quality evaluation will consist of the collection of twelve discrete surface soil samples from the grassy area behind the office building (the same area where prior background samples were collected). The samples will be collected with hand equipment, and will be placed in sealable plastic bags. The samples will be homogenized by kneading the soil in the bags thoroughly while rotating the bags end over end so that large and small particles are not segregated. An aliquot of soil will then be removed from the bag and placed in a laboratory provided container. These twelve samples will be analyzed for hexavalent chromium.

The supplemental sub-slab soil quality evaluation will consist of the collection of twelve discrete soil samples from beneath the concrete drip pad. The planned locations are shown on the attached figure. Samples will be collected using direct-push equipment. The concrete slab will be penetrated using a chisel bit (or similar), and the broken concrete will be removed from the hole prior to advancing the direct-push sampling tooling. Any stone base present beneath the slab will be disregarded. The upper six-inch interval of soil in each boring will be removed from the sampler, placed in a sealable plastic bag, and homogenized as described above. An aliquot of the homogenized soil will then be placed in a laboratory provided container, and submitted for hexavalent chromium analysis.

The data acquired during the above activities will be used to evaluate the concentration of hexavalent chromium in sub-slab soil relative to the site-specific background concentration. The distribution of hexavalent chromium in sub-slab soil samples may also be used to evaluate the possibility that historical (pre-Subpart W) activities at the site are the source of hexavalent chromium (if any) detected.

In addition to the above sampling and analysis activities, additional samples may be collected and retained for possible future analysis, based on the results. These additional samples may include split aliquots of the upper six-inch depth interval, samples from deeper intervals beneath the slab, or other samples collected based on field decisions.

Following receipt of data and additional analysis of retained samples (if any), a letter report of findings and associated conclusions will be submitted to the Department.

We anticipate completing the sampling activities in early March. Please let us know if you have any questions or comments regarding the proposed scope of work.

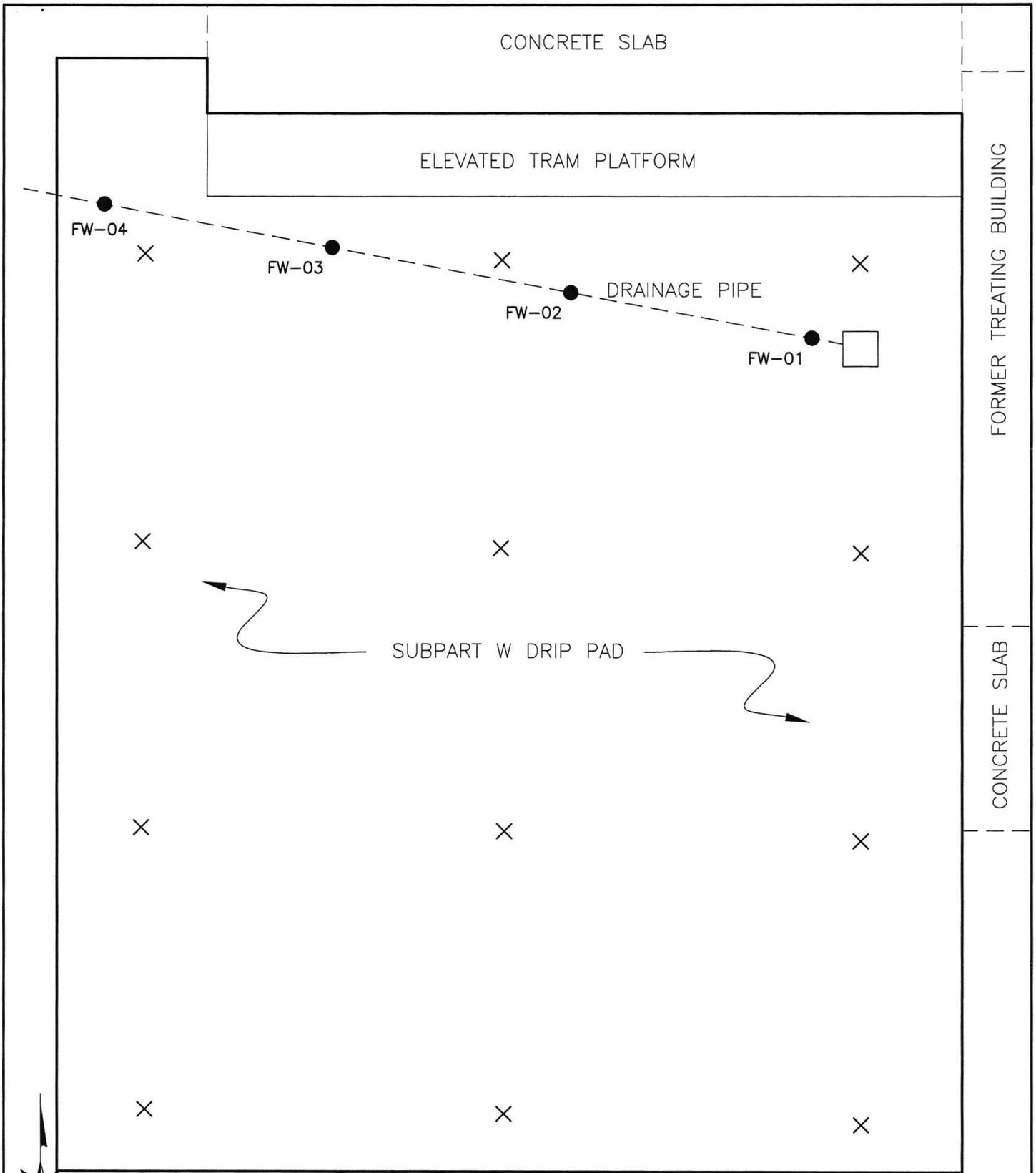
Sincerely,



David R. Kerschner, CPG
Principal
dkerschner@kuresources.com

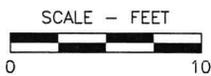
cc: **Jenny Patterson** – NCDENR
Dillard Jones – Lester Group/Fortress Wood Preserving





LEGEND

- SAMPLE LOCATION (PRIOR)
- × SAMPLE LOCATION (PLANNED)



NORTH

APPROVED	DRK 02/24/2015
CHECKED	DRK 02/24/2015
DRAWN	RAM 02/24/2015
CAD FILE NO.	13078A002
PROJECT NO.	FWP13078GDPC



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FIGURE
 SUPPLEMENTAL SOIL SAMPLING LOCATIONS
 SUBPART W DRIP PAD

HIGH POINT LOCATION
 GUILFORD COUNTY, NORTH CAROLINA

PREPARED FOR
FORTRESS WOOD PRODUCTS, INC
 GREENSBORO, NORTH CAROLINA