



5540 Centerview Drive
Suite 100
Raleigh, NC 27606

919.828.3150 PHONE
919.828.1977 FAX

www.TRCSolutions.com



September 7, 2007

Ms. Elizabeth Werner
NC Department of Environment and Natural Resources
Hazardous Waste Section, Waste Management Division
401 Oberlin Road
Raleigh, North Carolina 27605

Reference: Disposal of Lead Contaminated Asphalt and Soil – Area 4
Former Alcatel Facility
2912 Wake Forest Road, Raleigh, North Carolina
Facility ID No. NCD 003-185-238
TRC Project No. 111323-0010-00002

Dear Ms. Werner:

During a review of the project files, Mr. Dikran Kabbendjian of Alcatel-Lucent noted that a final letter report had not been submitted for the removal of lead impacted soil and asphalt in Area 4 of the former Alcatel facility located in Raleigh, North Carolina (Figure 1). Mr. Kabbendjian requested that TRC forward this information to your attention. This report documents the excavation activities conducted on June 16, 2003.

PREVIOUS INVESTIGATION

Westinghouse Environmental and Geotechnical Services, Inc. (Westinghouse) collected asphalt and soil samples across an area approximately 28 feet long and 25 feet wide (approximately 700 ft²) at the facility in April 1991 (Figure 2). Soil samples were collected from 13 locations. Twelve of the boring locations were sampled from depths of surface to six inches below land surface (bls) and 18 inches to 24 inches bls. One of the borings was advanced to 6 feet bls. Soil samples were collected in this boring at depths of two feet bls, four feet bls, and six feet bls. The soil samples collected were submitted to Westinghouse's laboratory for analysis for total lead.

Three asphalt cores from the study area were also submitted to the laboratory and analyzed for the presence of total lead. Laboratory analytical results indicated significant lead impact in the asphalt samples. Lead impact was also detected in the soil samples collected from surface to six inches bls.

WASTE CLASSIFICATION AND SOIL EXCAVATION

Alcatel contracted TRC in mid 2003 to characterize and properly dispose of the lead-impacted asphalt and soil present in the 700 ft² area. This included the overlying asphalt, and soil to a depth of approximately eight inches bls. Prior to initiating excavation activities, TRC collected one composite asphalt and one composite soil sample for analysis for the presence of leachable lead using the Toxicity Characteristic Leaching Procedure (TCLP). A composite soil sample was collected on April 17, 2003 and a composite asphalt sample was collected on April 19, 2003. The samples were analyzed by Prism Laboratories, Inc. (Prism), a North Carolina certified laboratory.

The analytical results were used to characterize the material and determine the proper disposition of the waste. Concentrations of lead in the composite soil sample were less than the laboratory practical quantitation limit of 0.50 milligrams per liter (mg/l). Lead concentrations in the asphalt were 78 mg/l, exceeding the regulatory limit of 5.0 mg/l for classification as a hazardous waste. A copy of the laboratory analytical report is attached in Appendix A.

The asphalt and underlying soil was excavated by A&D Environmental and Industrial Services, Inc. (A&D) on June 16, 2003. The excavation was conducted under the direct supervision of TRC and Alcatel personnel. A total of 17.8 tons of material was excavated. The material was transported under manifest by Southco Enterprises, Inc. to The Environmental Quality Company's Michigan Disposal Waste Treatment Plant in Belleville, Michigan, a Resource Conservation and Recovery Act Subtitle C Landfill. A copy of the hazardous waste manifest and Certificate of Disposal are attached in Appendix B.

CONFIRMATORY SAMPLING

Following removal of the asphalt and surficial soil, confirmatory grab soil samples were collected to insure that no significant concentrations of lead remained. A total of four soil samples (C-1, C-2, C-3, and C-4) were collected from the exposed ground surface. The sample collection locations were spaced-out across the area of excavation (Figure 3). The samples were submitted to Prism for analysis for the presence of lead using the TCLP Method.



The four confirmation soil samples did not contain any leachable lead at concentrations at or exceeding the laboratory practical quantitation limit of 0.50 mg/L. A copy of the laboratory analytical report is included in Appendix A. Following collection of the confirmatory samples, the excavated area was backfilled with clean soil and paved with asphalt.

If you have any questions regarding this matter, please contact me at (919) 256-6202.

Sincerely,

TRC



Kathleen A. Roush, L.G.
Project Manager

C: Dikran Kabbendjian – Alcatel-Lucent

L:\Alcatel\Raleigh\Asphalt Disposal\Asphalt Disposal Ltr Rpt.doc



Figures



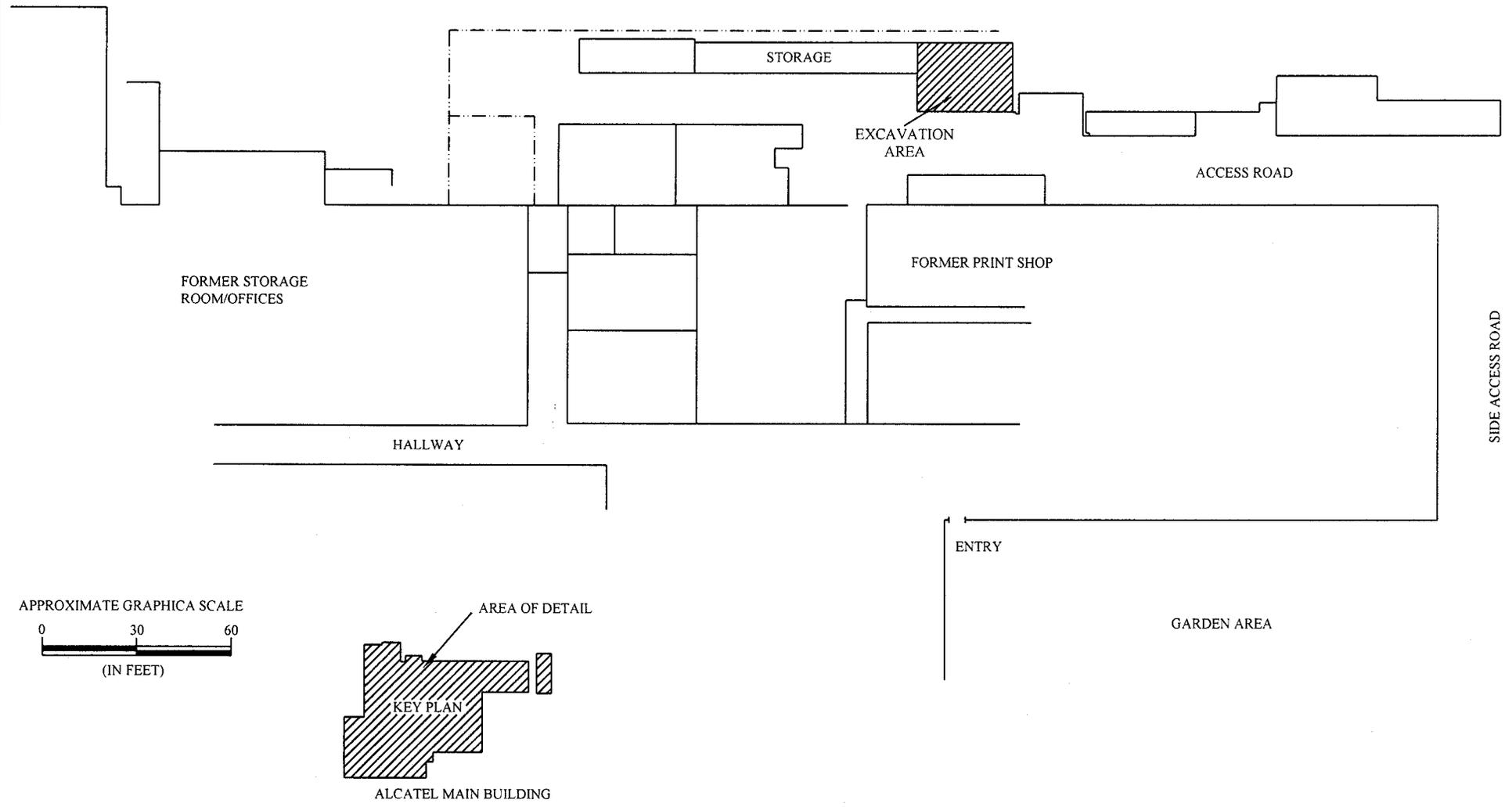
3-D TopoQuads Copyright © 1999 DeLorme Yarmouth, ME 04096 Source Data: USGS | 891.R Scale: 1:24,000 Detail: 13-0 Datum: NAD27

TRC Environmental Corporation
 5540 CENTERVIEW DR.
 SUITE 100
 RALEIGH, N.C. 27606
 (919)828-3150

PROJ. MGR.
 K. ROUSH
 DRAWN BY:
 USGS
 SCALE:
 NOTED
 DATE:
 01/09/07

SITE LOCATION
 ALCATEL USA SOURCING, LP
 RALEIGH, NORTH CAROLINA
 FILE:
 L:\Alcatel\ Raleigh\Asphalt Disposal\Figures\Location
 PROJ.#
 50636-0060-00007

FIGURE:
1



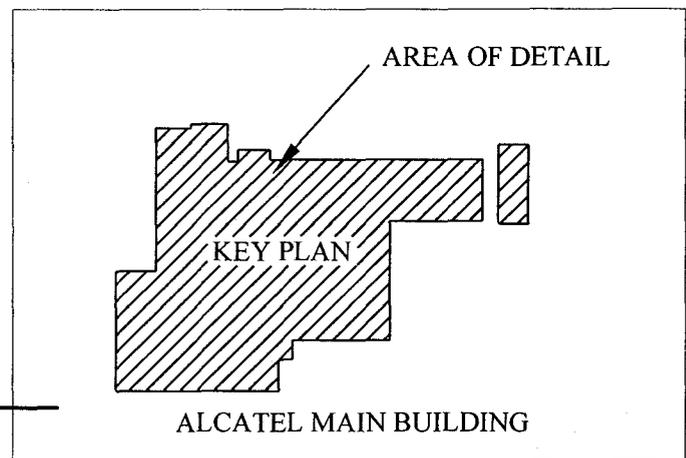
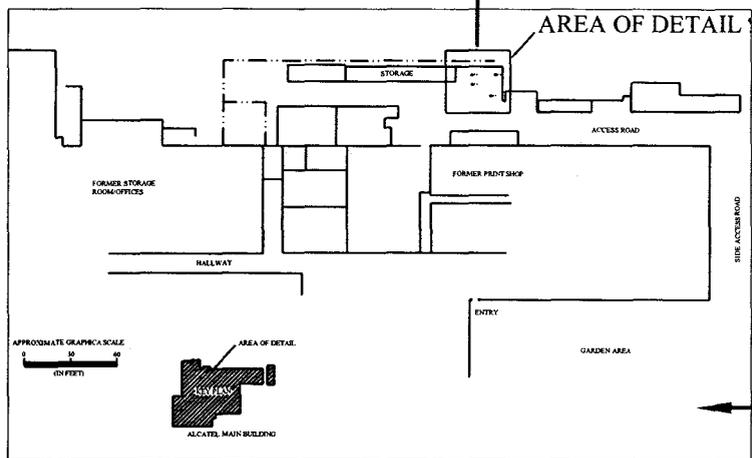
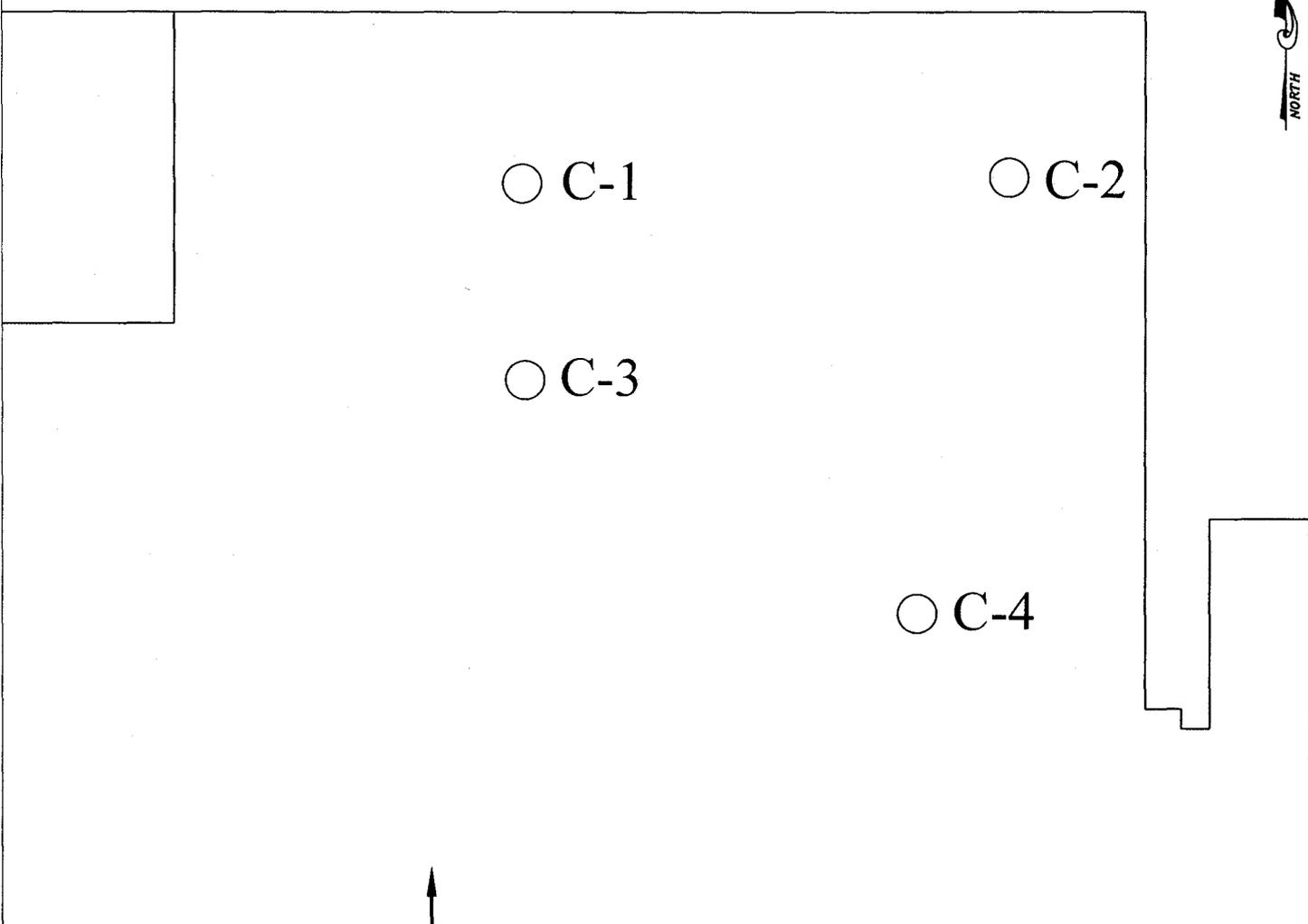
TRC Environmental Corporation
 5540 CENTERVIEW DR.
 SUITE 100
 RALEIGH, N.C. 27606
 (919)828-3150

SOURCE AREA

ALCATEL USA SOURCING, LP, Raleigh, North Carolina

Proj.# 50636-0060-00007
Drawn By: SWV
Scale: Noted
L:\Alcatel\Raleigh\Asphalt Disposal\Figures\Fig 2

FIGURE:
2



TRC Environmental Corporation
5540 CENTERVIEW DR.
SUITE 100
RALEIGH, N.C. 27606
(919)828-3150

PROJ. MGR.
K. ROUSH
DRAWN BY:
USGS
SCALE:
NOTED
DATE:
01/09/07

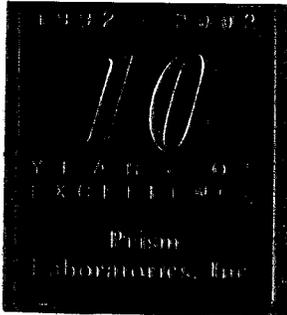
**CONFIRMATORY SOIL
SAMPLE LOCATIONS**
ALCATEL USA SOURCING, LP
RALEIGH, NORTH CAROLINA
FILE:
L:\Alcatel\ Raleigh\Asphalt Disposal\Figures\Fig 3
PROJ.#
50636-0060-00007

FIGURE:
3

Appendix A

Laboratory Analytical Reports

Lab Report



4/30/03

Page 1 of 2

TRC Environmental Corporation
Attn: Scott Shomer
516 N. West St.
Raleigh, NC 27603

Customer Project ID: **Alcatel**
Customer Sample ID: **ASPHALT**
Prism Sample ID: **AC79964**
Login Group: **7676K2**
Sample Collection Date/Time: **4/19/03 13:30**
Lab Submittal Date/Time: **4/22/03 18:00**

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	REPORTING LIMIT	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
TCLP EXTRACTION (METALS ONLY)	Completed			1311	4/24/03 14:05	MBS
LEAD, LEACHABLE	78	mg/L	10	6010	4/29/03 11:49	MSC
METALS DIGESTION	Completed			SW846-3010	4/25/03 08:30	MBS

Sample Comments:

Angela D. Overcash, V.P. Laboratory Services

4/30/03

Page 2 of 2

TRC Environmental Corporation
Attn: Scott Shomer
516 N. West St.
Raleigh, NC 27603

Customer Project ID: Alcatel
Customer Sample ID: SOIL
Prism Sample ID: AC79965
Login Group: 7676K2
Sample Collection Date/Time: 4/17/03 15:00
Lab Submittal Date/Time: 4/22/03 18:00

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	REPORTING LIMIT	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
TCLP EXTRACTION (METALS ONLY)	Completed			1311	4/24/03 14:05	MBS
LEAD, LEACHABLE	1.0	mg/L	0.50	6010	4/30/03 10:20	MSC
METALS DIGESTION	Completed			SW846-3010	4/25/03 08:30	MBS

Sample Comments:



Angela D. Overcash, V.P. Laboratory Services



Full Service Analytical & Environmental Solutions

449 Springbrook Road • P.O. Box 240543 • Charlotte, NC 28224-0543

Client Company Name: TRC Environmental Corp.

Report To/Contact Name: Scott Shaver

Reporting Address: 516 N West St.

Raleigh, NC 27603

Phone: 919-828-3150 Fax (Yes) (No): 919-838-9661

Site Location Name: Alcatel

Site Location Physical Address: Raleigh, NC

CHAIN OF CUSTODY RECORD

PAGE 1 OF 1 QUOTE # TO ENSURE PROPER BILLING: _____

Project Name: Alcatel

Short Hold Analysis: (Yes) (NO) UST Project: (Yes) (No)

*Please ATTACH any project specific reporting provisions and/or QC Requirements

Invoice To: TRC

Address: same

Purchase Order No./Billing Reference _____

Requested Due Date 1 Day 2 Days 3 Days 4 Days 5 Days
 6-9 Days Standard 10 days

Samples received after 15:00 will be processed next business day.
 Turnaround time is based on business days, excluding weekends and holidays.

(SEE REVERSE SIDE FOR RUSH TURNAROUND FEES)

LAB USE ONLY		YES	NO	N/A
Sample INTACT upon arrival?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Received ON WET ICE? Temp <u>2-4</u>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PROPER PRESERVATIVES indicated?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Received WITHIN HOLDING TIMES?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CUSTODY SEALS INTACT?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VOLATILES rec'd W/OUT HEADSPACE?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PROPER CONTAINERS used?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

TO BE FILLED IN BY CLIENT/SAMPLING PERSONNEL

Certification: NELAC _____ USACE _____ FL _____ NC X _____
 SC _____ OTHER _____ N/A _____

Water Chlorinated: YES _____ NO _____

Sample Iced Upon Collection: YES X NO _____

CLIENT SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED MILITARY HOURS	MATRIX (SOIL, WATER OR SLUDGE)	SAMPLE CONTAINER			PRESERVATIVES	ANALYSES REQUESTED	REMARKS	SUB LAB CERT. ID NO.	PRISM LAB ID NO.
				*TYPE SEE BELOW	NO.	SIZE					
Asphalt	4/17/03	13:30	Asphalt	C, G	2	4oz	none				79964
Soil	4/17/03	15:00	Soil	C, G	2	4oz	none				79965

Sampler's Signature [Signature] Sampled By (Print Name) Kevin O'Brient Affiliation TRC

PRESS DOWN FIRMLY - 3 COPIES

Upon relinquishing, this Chain of Custody is your authorization for Prism to proceed with the analyses as requested above. Any changes must be submitted in writing to the Prism Project Manager. There will be charges for any changes after analyses have been initialized.

Relinquished By: (Signature) <u>[Signature]</u>	Received By: (Signature) <u>[Signature]</u>	Date <u>4/22/03</u>	Military/Hours <u>1805</u>
Relinquished By: (Signature) <u>[Signature]</u>	Received By: (Signature) <u>[Signature]</u>	Date <u>4/22/03</u>	Military/Hours <u>12:20</u>
Relinquished By: (Signature) <u>[Signature]</u>	Received For Prism Laboratories By: <u>[Signature]</u>	Date <u>4/22/03</u>	Military/Hours <u>1800</u>

Method of Shipment: Fed Ex UPS Hand-delivered Prism Field Service Other

Log-In Group No. 7676K2

Additional Comments:

PRISM USE ONLY

Site Arrival Time: _____

Site Departure Time: _____

Field Tech Fee: _____

Mileage: _____

NPDES: NC SC NC SC NC SC NC SC

UST: NC SC NC SC NC SC NC SC

GROUNDWATER: NC SC NC SC NC SC NC SC

DRINKING WATER: NC SC NC SC NC SC NC SC

SOLID WASTE: NC SC NC SC NC SC NC SC

RCRA: NC SC NC SC NC SC NC SC

CERCLA: NC SC NC SC NC SC NC SC

LANDFILL: NC SC NC SC NC SC NC SC

OTHER: NC SC NC SC NC SC NC SC

SEE REVERSE FOR TERMS & CONDITIONS

6/23/03

Page 1 of 4

TRC Environmental Corporation
Attn: Scott Shomer
516 N. West St.
Raleigh, NC 27603

Customer Project ID: Alcatel
Customer Sample ID: C-1
Prism Sample ID: AC85351
Login Group: 8937K4
Sample Collection Date/Time: 6/16/03 14:50
Lab Submittal Date/Time: 6/17/03 17:00

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	REPORTING LIMIT	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
TCLP EXTRACTION (METALS ONLY)	Completed			1311	6/18/03 14:05	MBS
LEAD, LEACHABLE	Less than	mg/L	0.50	6010	6/19/03 19:13	LRD
METALS DIGESTION	Completed			SW846-3010	6/19/03 09:40	MBS

Sample Comments:



Angela D. Overcash, V.P. Laboratory Services

6/23/03

Page 2 of 4

TRC Environmental Corporation
Attn: Scott Shomer
516 N. West St.
Raleigh, NC 27603

Customer Project ID: Alcatel
Customer Sample ID: C-2
Prism Sample ID: AC85352
Login Group: 8937K4
Sample Collection Date/Time: 6/16/03 15:00
Lab Submittal Date/Time: 6/17/03 17:00

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	REPORTING LIMIT	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
TCLP EXTRACTION (METALS ONLY)	Completed			1311	6/18/03 14:05	MBS
LEAD, LEACHABLE	Less than	mg/L	0.50	6010	6/19/03 19:27	LRD
METALS DIGESTION	Completed			SW846-3010	6/19/03 09:40	MBS

Sample Comments:



Angela D. Overcash, V.P. Laboratory Services

6/23/03

Page 3 of 4

TRC Environmental Corporation
Attn: Scott Shomer
516 N. West St.
Raleigh, NC 27603

Customer Project ID: Alcatel
Customer Sample ID: C-3
Prism Sample ID: AC85353
Login Group: 8937K4
Sample Collection Date/Time: 6/16/03 15:05
Lab Submittal Date/Time: 6/17/03 17:00

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	REPORTING LIMIT	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
TCLP EXTRACTION (METALS ONLY)	Completed			1311	6/18/03 14:05	MBS
LEAD, LEACHABLE	Less than	mg/L	0.50	6010	6/19/03 19:32	LRD
METALS DIGESTION	Completed			SW846-3010	6/19/03 09:40	MBS

Sample Comments:



Angela D. Overcash, V.P. Laboratory Services

6/23/03

Page 4 of 4

TRC Environmental Corporation
Attn: Scott Shomer
516 N. West St.
Raleigh, NC 27603

Customer Project ID: Alcatel
Customer Sample ID: C-4
Prism Sample ID: AC85354
Login Group: 8937K4
Sample Collection Date/Time: 6/16/03 15:10
Lab Submittal Date/Time: 6/17/03 17:00

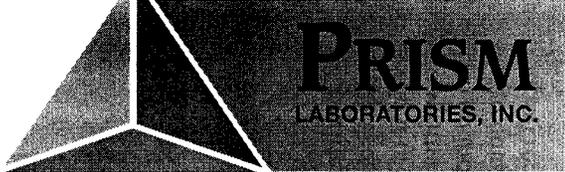
The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

TEST PARAMETER	TEST RESULT	UNITS	REPORTING LIMIT	METHOD REFERENCE	DATE/TIME STARTED	ANALYST
TCLP EXTRACTION (METALS ONLY)	Completed			1311	6/18/03 14:05	MBS
LEAD, LEACHABLE	Less than	mg/L	0.50	6010	6/19/03 19:36	LRD
METALS DIGESTION	Completed			SW846-3010	6/19/03 09:40	MBS

Sample Comments:



Angela D. Overcash, V.P. Laboratory Services



449 Springbrook Road ▲ Charlotte, NC 28217
 P.O. Box 240543 ▲ Charlotte, NC 28224-0543
 Phone: 704/529-6364 ▲ Fax: 704/525-0409

PRESS DOWN FIRMLY - 3 COPIES

Full Service Analytical & Environmental Solutions

Client TRC Environmental Corporation
 Physical Address 516 N. West St.
Raleigh, NC 2760
 Phone 919-828-3150 Fax 919-838-9661
 P.O.#/Billing Reference _____
 Project Name Alcatel

REPORT TO: Name Scott Shamer
 Address same
 BILL TO: Name TRC
 Address _____
 Requested Due Date STANDARD TURN

	YES	NO	N/A
Samples INTACT upon arrival?			
Received ON WET ICE? Temp _____			
PROPER PRESERVATIVES indicated?			
Received WITHIN HOLDING TIMES?			
CUSTODY SEALS INTACT?			
VOLATILES rec'd W/OUT HEADSPACE?			
PROPER CONTAINERS used?			

State Certification
 Requested NC SC _____ Other _____ NA _____
 Water Chlorinated Yes _____ No _____ NA
 Sample Iced Upon Collection Yes No _____

(SEE REVERSE SIDE FOR RUSH TURNAROUND FEES)

CLIENT SAMPLE DESCRIPTION	DATE COLLECTED	TIME COLLECTED MILITARY HOURS	MATRIX (SOIL, WATER OR SLUDGE)	SAMPLE CONTAINER			PRESERVATIVES	ANALYSES REQUESTED	REMARKS	SUB LAB CERT. ID NO.	PRISM LAB ID NO.
				*TYPE SEE BELOW	NO.	SIZE					
C-1	6/16/03	14:50	Soil	C, G	1	8 oz	none				
C-2	↓	15:00	↓	↓	↓	↓	↓				
C-3	↓	15:05	↓	↓	↓	↓	↓				
C-4	↓	15:10	↓	↓	↓	↓	↓				

Sampler's Signature [Signature] Sampled By (Print Name) Kevin O'Brian Affiliation TRC Environmental Corp.

Relinquished By: (Signature) <u>[Signature]</u>	Received By: (Signature) <u>[Signature]</u>	Date <u>6/16/03</u>	Military/Hours <u>12:00</u>
Relinquished By: (Signature)	Received By: (Signature)	Date	
Relinquished By: (Signature)	Received For Prism Laboratories By:	Date	
Method of Shipment		Log-In Group No.	

Additional Comments

NPDES NC _____ UST: NC _____ GROUNDWATER: NC _____ DRINKING WATER: NC _____ SOLID WASTE: NC _____ OTHER: NC _____
 SC _____ SC _____ SC _____ SC _____ SC _____ SC _____
 OTHER _____ OTHER _____ OTHER _____ OTHER _____

*CONTAINER TYPE CODES: A = Amber C = Clear G = Glass P = Plastic; TL = Teflon-Lined Cap VOA = Volatile Organics Analysis (Zero Head Space)

SEE REVERSE FOR TERMS & CONDITIONS

CUSTOMER COPY

Appendix B

Waste Manifest and Certificate of Disposal



WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE

ATT. DIS. REJ. PR.

Required by authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Form Approved. OMB No. 2050-0039

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NCD003185238		Manifest Document No. 61603		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Alcatel 2912 Wake Forest RD Raleigh, NC 27609				A. State Manifest Document Number MI 7413263		B. State Generator's ID			
4. Generator's Phone (919) 850-6248		6. US EPA ID Number NCR000002501		C. State Transporter's ID		D. Transporter's Phone 336-882-8000		E. State Transporter's ID	
5. Transporter 1 Company Name Southco Enterprises Inc.		7. Transporter 2 Company Name		8. US EPA ID Number		F. Transporter's Phone			
9. Designated Facility Name and Site Address Michigan Disposal Waste Treatment Plant 49350 N. I-94 Service Dr. Belleville, MI 48111				10. US EPA ID Number MID000724831		G. State Facility's ID		H. Facility's Phone 734-699-6288	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).				12. Containers		13. Total Quantity		14. Waste Unit Wt/Vol	
a. X RQ, Hazardous Waste Solid N.O.S. (Lead) 9, NA 3077, PG III ERG#171				1 DT		18		T DD08	
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above 11A) 061003EAE				K. Handling Codes		a.		b.	
15. Special Handling Instructions and Additional Information Emergency Contact & Number: Eric McManus @ 1-800-434-7750									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.				Date		Month		Day Year	
Printed/Typed Name <i>Eric McManus</i>				Signature <i>[Signature]</i>		16		7 2002	
17. Transporter 1 Acknowledgement of Receipt of Materials				Date		Month		Day Year	
Printed/Typed Name				Signature		Month		Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials				Date		Month		Day Year	
Printed/Typed Name				Signature		Month		Day Year	
19. Discrepancy Indication Space OK IS CHANGE PER ERIC McManus and Jim Schulte 6/15/02									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.				Date		Month		Day Year	
Printed/Typed Name RYAN SCHULTE				Signature <i>[Signature]</i>		6		17 2002	

GENERATOR

TRANSPORTER

FACILITY

CERTIFICATE OF DISPOSAL



This certificate is to verify the wastes specified on Manifest # MI 7413263

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME:
(Please check one)

Michigan Disposal Waste Treatment Plant
(EPA I.D. # MID000724831)

Wayne Disposal, Inc.
(EPA I.D. # MID048090633)

ADDRESS:

49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER:

1-800-592-5489

FAX NUMBER:

1-800-592-5329

Authorized Signature: _____