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24 June 2016

Mr. Kim T. Caulk
NCDEQ Superfund Section
Inactive Hazardous Sites Branch
REC Program
1646 Mail Service Center
Raleigh, NC 27699-1646

Subject: Addendum to Workplan for Supplemental Assessment
Norfolk Southern Railway Company
Shulimson Brothers Scrap Yard
Asheville, Buncombe County, North Carolina
Site I.D. No. NCN 000 407 206
NSRC Project No. SA96.036-001
Geosyntec Project No. KX5615

Dear Mr. Caulk:

Geosyntec Consultants of NC, PC (Geosyntec) is pleased to submit this addendum to a workplan that was submitted to the North Carolina Department of Environmental Quality (NCDEQ) for the Shulimson Brothers Scrap Yard (the "Site") on 3 May 2016. This letter also serves as the progress report for the second quarter of 2016 and is submitted on behalf of Norfolk Southern Railway Company (NSRC).

The *Workplan for Supplemental Assessment* (February 2016) was prepared and previously submitted to NCDEQ. This plan was developed to address data gaps identified in the *Remedial Investigation Report* prepared by Marshall Miller & Associates, Inc. in July 2009. Data obtained from the supplemental assessment will be used to develop Site-specific remedial goals which will be provided in a subsequent Remedial Action Plan (RAP) addendum for impacted soil at the Site. We anticipate that the scope of work outlined in the supplemental assessment workplan and the changes provided in this addendum will be executed in the third quarter of 2016.

Since the supplemental assessment workplan was submitted, Geosyntec has further evaluated the proposed distribution of polychlorinated biphenyls (PCB) sample locations provided in the workplan and this addendum letter provides some changes to the original plan with regard to PCB sample locations. The PCB samples are being collected for two purposes that include: (i) delineation of total Aroclor concentrations above 50 parts per million (ppm); and (ii) assessment of PCB congener concentrations. PCB sample locations and sampling methodology was described on pages 16 and 17 of the workplan. PCB sample locations for both total Aroclors and PCB congeners were provided in Figure 6.

As part of the remedial strategy at the Site, soil impacted with total Aroclor concentrations above 50 ppm will be excavated and disposed at a Toxic Substance Control Act (TSCA) permitted disposal facility. The samples locations proposed in the workplan will be collected at intervals in accordance with TSCA regulations for delineation and these sample locations remain unchanged from the original workplan. Due to the recent changes in the *Registered Environmental Consultant (REC) Program Implementation Guidance* (October 2015), Geosyntec has re-evaluated the need for additional assessment of PCB congeners in accordance with the REC Program guidance. Assessment for PCB congeners has not been conducted at the Site in the past. Based on elevated total Aroclor concentrations along portions of the former lease boundary at the Site, Geosyntec has proposed additional sample locations for PCB congener analysis adjacent to and outside of the former lease boundary. This assessment will provide additional data for selection and design of an appropriate remedial strategy and a more comprehensive risk analysis. The revised PCB sample location map is provided as an attachment (revised Figure 6 from workplan).

Surface soil will be collected at all of the proposed sample locations depicted on Figure 6. The number of samples collected and purpose include:

1. Collect 39 samples for PCB analysis (total Aroclors) to satisfy TSCA regulations. These sample locations are unchanged from the workplan.

2. Collect an additional 10 soil samples for PCBs (total Aroclors), PCB congeners, and VOCs to satisfy the October 2015 NCDEQ REC Program guidance at the areas where PCB impacts are known to be elevated. Five of these samples were added to the revised Figure 6 along the lease boundary in areas where elevated total Aroclors were previously identified.

3. Collect 27 samples for the analysis of PCBs (total Aroclors) and PCB congeners to delineate PCB impacts outside of the former lease boundary and/or used for risk analysis depending on the results. These samples were added to delineate potential impacts outside of the lease boundary.

Initially, the 49 samples described in steps 1 and 2 above will be submitted to the laboratory and analyzed. The 27 samples collected in step 3 above will be submitted to the laboratory, frozen, and analyzed sequentially based on the results of the previous two samples. Analytical methods and laboratory information were previously provided in the workplan.

Prior to conducting the supplemental assessment activities at the Site, the Site will be bush-hogged to provide safe access to all of the sampling locations. Geosyntec anticipates that the Site will be bush-hogged two additional times this year.

The required Remediating Party and CSM Certifications are attached. Work is progressing to complete required elements of the REC program in a timely manner.

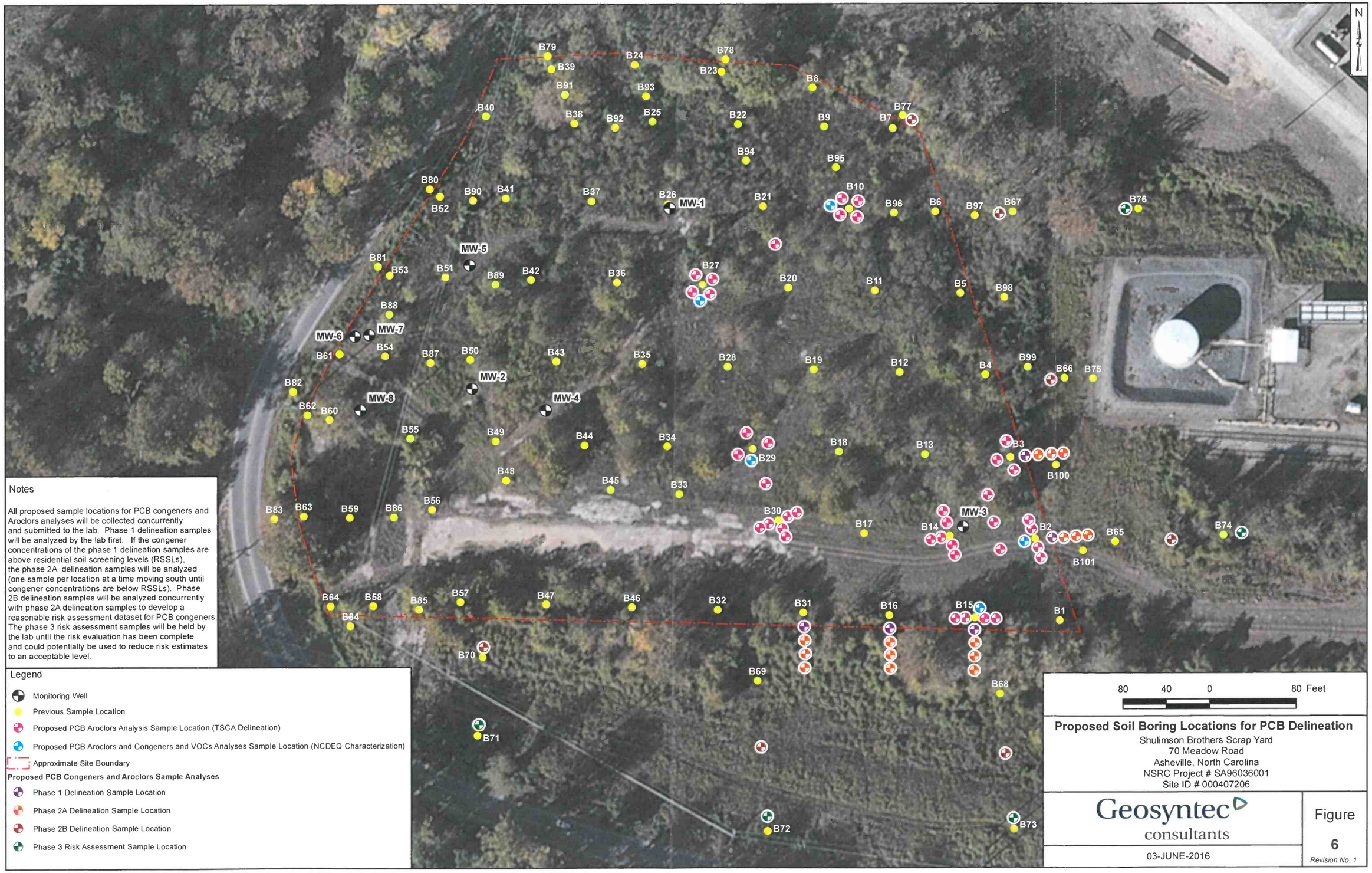
If you have any questions, feel free to contact the undersigned. Mr. Leonard can be contacted at 865-323-5683 and Mr. Hodge can be contacted at 919-424-1828.

Regards,

L. Leroy Leonard
Senior Scientist

Beau Hodge, P.G., RSM
Principal

Attachments: Revised Figure 6: Proposed Soil Boring Locations for PCB Delineation
Remediating Party Document Certification Statement
Registered Site Manager Document Certification Statement



Notes

All proposed sample locations for PCB congeners and Aroclors analyses will be collected concurrently and submitted to the lab. Phase 1 delineation samples will be analyzed by the lab first. If the congener concentrations of the phase 1 delineation samples are above residential soil screening levels (RSSLs), the phase 2A delineation samples will be analyzed (one sample per location at a time moving south until congener concentrations are below RSSLs). Phase 2B delineation samples will be analyzed concurrently with phase 2A delineation samples to develop a reasonable risk assessment dataset for PCB congeners. The phase 3 risk assessment samples will be held by the lab until the risk evaluation has been complete and could potentially be used to reduce risk estimates to an acceptable level.

Legend

- Monitoring Well
- Previous Sample Location
- Proposed PCB Aroclors Analysis Sample Location (TSCA Delineation)
- Proposed PCB Aroclors and Congeners and VOCs Analyses Sample Location (NCDEQ Characterization)
- Approximate Site Boundary

Proposed PCB Congeners and Aroclors Sample Analyses

- Phase 1 Delineation Sample Location
- Phase 2A Delineation Sample Location
- Phase 2B Delineation Sample Location
- Phase 3 Risk Assessment Sample Location

Proposed Soil Boring Locations for PCB Delineation

Shulimson Brothers Scrap Yard
70 Meadow Road
Asheville, North Carolina
NSRC Project # SA96036001
Site ID # 000407206

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03-JUNE-2016

Figure 6

Revision No. 1

REC PROGRAM DOCUMENT CERTIFICATION FORM - PAGE 1 OF 2
IHSB SITE NAME Shulimson Brothers Scrap Yard
DATE & NAME OF DOCUMENT 24 June 2016 Addendum to Workplan for Supplemental Assessment
TYPE OF SUBMITTAL (circle all that apply): Report, Work plan, Work Phase Comp. Statement, Schedule Change

REMEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(B)(2))

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

C.R. McDANIEL - DIR. ENV. ENG.

Norfolk Southern Railway Company
Name of Remediating Party

Signature of Remediating Party

7-7-16
Date

NATHAN PERKINS
MY COMMISSION EXPIRES
NOTARY
PUBLIC
FEBRUARY 11, 2020
FAYETTE COUNTY, GA

NOTARIZATION

Georgia (Enter State)
Fayette **COUNTY**

I, Nathan Perkins, a Notary Public of said County and State, do hereby certify that C. Russ McDaniel did personally appear and sign before me this day, produced proper identification in the form of driver license, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 7 day of July, 2016.

Notary Public (signature)

(OFFICIAL SEAL)

NATHAN PERKINS
MY COMMISSION EXPIRES
NOTARY
PUBLIC
FEBRUARY 11, 2020
FAYETTE COUNTY, GA

My commission expires: Feb. 11, 2020

Document Certification Form No. DC - I
(Revised 8/11)

REC PROGRAM DOCUMENT CERTIFICATION FORM - PAGE 2 OF 2
IHSB SITE NAME Shulimson Brothers Scrap Yard
DATE & NAME OF DOCUMENT 24 June 20 Addendum to Workpla
TYPE OF SUBMITTAL (circle all that apply): Report, Work plan, Work Phase Comp. Statement, Schedule Change

REGISTERED SITE MANAGER CERTIFICATION OF SIGNATURES

As the Registered Environmental Consultant for the Site for which this filing is made, I certify that the signatures included herewith are genuine and authentic original handwritten signatures and/or true, accurate, and complete copies of the genuine and authentic original handwritten signatures of the persons who purport to sign for this filing. I further certify that I have collected through reliable means the originals and/or copies of said signatures from the persons authorized to sign for this filing who, in fact, signed the originals thereof. Those persons and I understand and agree that any copies of signatures have the same legally binding effect as original handwritten signatures, and I certify that any person for whom I am submitting a copy of their signature has provided me with their express consent to submit said copy. Additionally, I certify that I am authorized to attest to the genuineness and authenticity of the signatures, both originals and any copies, being submitted herewith and that by signing below, I do in fact attest to the genuineness and authenticity of all the signatures, both originals and copies, being submitted for this filing.

Beau Hodge
Name of Registered Site Manager

Signature of Registered Site Manager

7/8/2016
Date

REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1))

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act N.C.G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Beau Hodge
Name of Registered Site Manager

Signature of Registered Site Manager

7/8/2016
Date

NOTARIZATION

North Carolina (Enter State)

Wake COUNTY

I, Holly Van Norman, a Notary Public of said County and State, do hereby certify that Beau Hodge did personally appear and sign before me this day, produced proper identification in the form of NCDL, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certifications is true and accurate, and he or she then signed these Certifications in my presence.

WITNESS my hand and official seal this 8 day of July, 2016.

Notary Public (signature)

My commission expires: 12/15/2017.

(OFFICIAL SEAL)
HOLLY VAN NORMAN
Notary Public
Wake County
NORTH CAROLINA

Document Certification Form No. DC - II
(Revised 8/11)