

Via Email

July 13, 2016

Hazardous Waste Section
Division of Waste Management
NC Department of Environmental Quality
1646 Mail Service Center
Raleigh, NC 27699-1646



Attn: Mr. Joe Ghiold

Re: CERCLA Area B Cap – 4th Quarterly Inspection Report
Clariant Corporation – Mount Holly East Plant
Charlotte, Mecklenburg County, North Carolina
Site Identification No. NCD001810365
H&H Job No. CLR-059

Dear Carl:

On behalf of Clariant Corporation (Clariant), Hart & Hickman (H&H) is submitting this report to document inspections of the CERCLA Area B cap conducted during May, June, and July 2016 at the Clariant Mount Holly East facility located at 11701 Mount Holly Rd in Charlotte, NC.

During May 2015, routine maintenance was performed to fill cracks in the CERCLA Area B cap asphalt and to remove a small mounded area of asphalt in the southwest portion of the cap. Following removal of the small mound, this area was repaved with asphalt. After completing the maintenance activities, black fluid was observed daylighting at a very low rate from a small hole in the repaved area where the mound was previously located. Cap repair activities were completed to address the daylighting in July 2015. The repair activities were conducted in accordance with a work plan approved by the NC Department of Environmental Quality (DEQ) Hazardous Waste Section (HWS) in a letter dated July 1, 2015. The cap repair generally included removal of a small portion of the cap in the area where the black material was daylighting and placement of an area of relatively thick concrete targeting the source/path of the black material into the area. The cap repair activities were documented in the October 13, 2015 *CERCLA Area B Cap Repair and 1st Quarterly Inspection Report* which was submitted to HWS.

As part of the work plan approval, DEQ requested that Clariant perform weekly inspections of the CERCLA Area B cap and cap repairs for a period of three months following the repairs, then monthly inspections for a period of nine months. In addition, DEQ requested submittal of quarterly reports to summarize the cap inspections. In accordance with this request, Clariant

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performed monthly cap and cap repair area inspections during May, June, and July 2016, and cap inspection log sheets for these three inspections are attached. As part of the inspections, Clariant personnel walk the cap and observe for cracks which need to be sealed/re-sealed, vegetative growth in cracks, mounding, and evidence of black material daylighting through or along the edges of the cap (including in the culvert adjacent to the repair area). During the three-month reporting period, the inspections did not indicate a need for cap maintenance, there was no evidence of black material daylighting through the cap or along the edges of the cap, and the repaired area of the cap does not appear to be sinking or rising.

This represents the one year post-repair quarterly report. Therefore, separate quarterly reports will no longer be submitted to DEQ. However, future cap inspections will continue to be performed on a quarterly basis and the inspection results will be documented in the annual remedial action effectiveness reports submitted to DEQ.

Should you have any questions or need any additional information, please contact us at 704-586-0007.

Sincerely,
Hart & Hickman, PC



Scott Drury, PE
Sr. Project Engineer



Steve Hart, PG
Principal

Attachments

cc: Mr. Ken Hausle (Clariant)

CERCLA Area B Cap Inspection Log
Clariant Corporation - Mt. Holly East Plant
Charlotte, North Carolina
Site ID No. NCD001810365

The NC Department of Environment and Natural Resources (DENR) Hazardous Waste Section (HWS) has requested weekly inspection of the CERCLA Area B Cap for a period of three months following cap repair work completed on July 8, 2015. Following the initial three months of weekly inspections, the HWS has requested monthly inspections of the cap for a period of nine months. During inspections, the items listed below shall be checked by inspection personnel and inspection personnel shall record the date of the inspection and place initials next to each completed item on this log. The log shall be maintained on-site.

Date:	5-3-16	6-1-16	7-5-16	
Inspection Item	DW	DW	DW	
Cracks in asphalt portion of cap are sealed	DW	DW	DW	
Confirm vegetative growth is not evident on the cap (e.g., growing in cracks)	DW	DW	DW	
Confirm liquid is not daylighting through the cap	DW	DW	DW	
Check concrete repair area surface for cracks (note below if cracks observed)	DW	DW	DW	
Confirm concrete repair area does not appear to be sinking or rising	DW	DW	DW	
Confirm liquid is not daylighting along the edges of the concrete repair area	DW	DW	DW	
Check culvert adjacent to concrete repair area for evidence of liquid daylighting from edges of impoundment	DW	DW	DW	

Inspector's Printed Name: Dwayne Wallace

Comments/Action Items

Note any pertinent observations, action items, corrective actions taken, relevant the dates.