

**Soil Remedial Action Plan Addendum:
Former Drainage Ditch B
Former Flint Ink
515 South Turner Avenue
Charlotte, North Carolina
NCD 083 678 631**

Prepared For:

**Flint Group US LLC
14909 N. Beck Road
Plymouth, Michigan 48170**

July 13, 2016

**AECOM
Project No. 60408261**

IHSB SITE NAME Former Sinclair & Valentine Site (NCD 083 6778 6311)

DATE & NAME OF DOCUMENT July 13, 2016; Soil Remedial Action Plan Addendum

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."

Flint Group US LLC
Name of Remediating Party

Michelle A. Domas
Signature of Remediating Party

7/15/16
Date

NOTARIZATION

Michigan (Enter State)

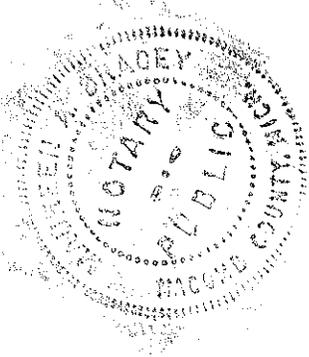
Wayne COUNTY

I, Maureen A. Bracey, a Notary Public of said County and State, do hereby certify that Michelle A. Domas 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 15 day of July, 2016.

Maureen A. Bracey
Notary Public (signature)

(OFFICIAL SEAL)



My commission expires: 2/20/2020

Maureen A. Bracey
Notary Public, Macomb County
State of Michigan
Acting in Wayne County
My commission expires Feb 20, 2020

IHSB SITE NAME Former Sirebairi Vokshin Site CNO 063 6778 4311
DATE & NAME OF DOCUMENT Sail Remedial Action Plan Addendum - July 13, 2016
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.

Robert MacWilliams
Name of Registered Site Manager

[Signature]
Signature of Registered Site Manager

7/15/2016
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."

Robert MacWilliams
Name of Registered Site Manager

[Signature]
Signature of Registered Site Manager

7/15/2016
Date

NOTARIZATION

NORTH CAROLINA (Enter State)

MECKLENBURG COUNTY

I, YOLANDA K BELL a Notary Public of said County and State, do hereby certify that ROBERT MACWILLIAMS did personally appear and sign before me this day, produced proper identification in the form of DRIVERS LICENSE, 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 15th day of JULY, 2016.
[Signature]
Notary Public (signature)



My commission expires: 11/25/17.

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1.0 INTRODUCTION	1
2.0 PROPERTY DESCRIPTION AND HISTORICAL OPERATIONS	3
3.0 FORMER DRAINAGE DITCH B - EXCAVATIONS AND ASSESSMENTS	4
3.1 July 2009 Excavation	4
3.2 Soil Assessment – August/October 2009, July/October 2011	5
3.3 Remedial Options Evaluation	6
3.3.1 Adjusted Residential Final Health-Based Soil Remediation Goals	6
3.3.2 Attainment of Health Based Soil Remediation Goals through Averaging Contaminant Concentrations	6
3.3.3 Adjusted Industrial Health-Based Soil Remediation Goals and Notice of Containment	6
3.3.3.1 Soil Assessment – May 2015	7
3.3.3.2 Leach to Groundwater	8
4.0 CONTAINMENT REMEDY	10
4.1 Containment Remedy Notification Letter	10
4.2 Declaration of Perpetual Land Use Restrictions	10
4.3 Notice of an Inactive Hazardous Substance or Waste Disposal Site	10
5.0 EVALUATION OF PROPOSED CONTAINMENT REMEDY	11
6.0 REFERENCES	12

TABLE

Table 1 – Existing Soil Analytical Results – Former Drainage Ditch B

FIGURES

Figure 1 – Site Location Map

Figure 2 – Existing Soil Analytical Results

APPENDICES

Appendix A Composite Analytical Results

Appendix B Disposal Manifests from Excavation Activities within Former Drainage Ditch B

Appendix C Photographic Log of Excavation Activities

Appendix D Electronic Correspondence Concurrence from North Carolina Department of Environmental Quality

Appendix E Declaration of Perpetual Land Use Restrictions

Appendix F Notice of an Inactive Hazardous Waste or Waste Disposal Site

1.0 INTRODUCTION

AECOM, on behalf of Flint Group US LLC (FGL), has prepared this Soil Remedial Action Plan Addendum (RAP Addendum) for the North Carolina Department of Environmental Quality (NCDEQ) as an addendum to the Remedial Action Plan (RAP), dated February 4, 2008, which addressed soil impacts identified in the following areas of the site:

- Former Drainage Ditch A;
- Former Drainage Ditch B;
- Former Compactor; and,
- Former Dry well.

Comprehensive information specific to soil impacts in these areas and associated contaminants of concern are documented in the *Phase I Remedial Investigation Report*, March 2003. Subsequent remedial activities completed pursuant to the February 4, 2008 RAP within the Former Drainage Ditch A, Former Compactor and Former Dry well areas were documented in the *Soil Remedial Completion Report: Former Drainage Ditch A, Former Compactor and Former Dry Well Areas* dated October 9, 2014. Remedial actions as proposed in the February 4, 2008 RAP could not be completed in the Former Drainage Ditch B area due to unforeseen excavation constraints beneath the existing site building located in close proximity to the targeted area of affected soils.

As documented in the February 4, 2008 RAP, the original remedial action proposed for Former Drainage Ditch B area included the following:

- Excavation of soils above the Inactive Hazardous Sites Branch Preliminary Residential Health Based Soil Remediation Goal (RG) and the Protection of Groundwater Standard (GRG).
- Transporting impacted soil to the nearest Subtitle D non-hazardous landfill.
- Confirmation soil sampling.
- Backfilling the excavation area with clean fill. and,
- Compacting the backfill to match existing grade.

Soil excavation activities were implemented within the Former Drainage Ditch B Area in July 2009 and October 2012. During excavation activities, URS (now AECOM) personnel determined soil impacts above the Preliminary Residential Health Based Soil Remediation Goal could not be completely removed because impacted soil extended beneath the onsite building. Rather than compromise the structure of the building, AECOM chose to implement a containment remedy in the Former Drainage Ditch B area.

This RAP Addendum includes information related to soil excavation activities completed in July 2009 and October 2012 as well as NCDEQ required documents for implementing a containment remedy for the Former Drainage Ditch B Area. Soil assessment activities completed since submittal of the February 4, 2008 RAP have been documented and were submitted to the NCDEQ in the *Containment Remedy Notification Letter*, dated June 19, 2015.

The component requirements for a Remedial Action Plan pursuant to the REC Rules (15A NCAC 13C) are documented within the February 4, 2008, RAP. For document brevity purposes, duplicate component sections (geology, hydrogeology, topography, and surrounding properties) have not been included within this RAP Addendum.

2.0 PROPERTY DESCRIPTION AND HISTORICAL OPERATIONS

The Site/Subject Property is located at 515 South Turner Avenue in Charlotte, Mecklenburg County, North Carolina and consists of approximately 1.8 acres. One (1) acre of which is developed with a building which measures approximately 12,500 square feet. The building is located on the southwest portion of the Site. The remainder of the Site is undeveloped woodland. The developed portion of the Site is fenced in with restricted access. **Figure 1** shows Site details and the Former Drainage Ditch A, Former Drainage Ditch B, Former Compactor and Former Dry Well Areas.

Based on a review of Sanborn Fire Insurance Maps and historical aerial photos of the area, development at the Site appears to have occurred between 1929 and 1950. Reportedly, a portion of the original building was used as a machine shop from the late 1930s until an undetermined date. Other known operations include mixing of printing inks. Inks prepared at the Site included relatively thick, viscid paste and thinner inks used for flexographic printing.

Operations at the Site were conducted under the name Sinclair & Valentine until 1990, at which time the facility was acquired by FGL. FGL operated the facility from 1990 until 2002. In June 2002, operations ceased.

The current owner, Carolina Urban Properties Limited Partnership (Carolina Properties) acquired the property from FGL in 2007. Currently, Carolina Urban Properties LTD (CUB) utilizes the space for storage of construction and home renovation materials associated with their business.

3.0 FORMER DRAINAGE DITCH B - EXCAVATIONS AND ASSESSMENTS

The results of the Phase II Remedial Investigation Report (URS; February 2006) indicated concentrations of the following contaminants of concern (COC) within the Former Drainage Ditch B area at levels exceeding the applicable Preliminary Residential Health Based Soil Remediation Goal (PRHBSRG), Protection of Groundwater Preliminary Soil Remediation Goal (PGPSRG) and/or the Site Specific Background Concentration (SSBC):

- Benzo(a)anthracene;
- Benzo(a)pyrene;
- Benzo(k)fluoranthene;
- Benzo(b)fluoranthene;
- Bis(2-ethylhexyl) Phthalate;
- Dibenz(a,h)anthracene;
- Indeno(1,2,3-cd)pyrene;
- Chromium; and,
- Lead.

As stated within the February 2008 RAP, excavation and removal of impacted soils was selected as the remedial action to address affected soils in the Former Drainage Ditch B Area, as well as the following areas:

- Former Drainage Ditch A;
- Former Compactor; and,
- Former Dry Well.

Completion activities for the Former Drainage Ditch A, Former Compactor and Former Dry Well areas were documented in the *Soil Remedial Completion Report: Former Drainage Ditch A, Former Compactor and Former Dry Well Areas*, dated October 9, 2014. In accordance with the RAP, excavation activities were initiated in the Former Drainage Ditch B in July 2009.

3.1 JULY 2009 EXCAVATION

Planned soil excavation activities detailed in the February 2008 RAP were initiated in the Former Drainage Ditch B area on July 21, 2009. Evo Corporation began excavating soils within Former Drainage Ditch B under the supervision of URS (now AECOM) personnel. Confirmation soil samples, D-8 through D-12 (four sidewall and one bottom), were analyzed for Base Neutrals by EPA method 8270 and Chromium and Lead by EPA method 6010. The locations of these soil samples in respect to Former Drainage Ditch B area are indicated on **Figure 2**. Sidewall and base of the excavation samples exhibited concentrations above the PRHBSRG and/or PGPSRG for several base neutrals and Chromium. **Table 1** shows results for soil samples D-8 through D-12 (laboratory analytical data was included in Attachment A of the *Containment Remedy Notification Letter* dated June 19, 2015). The excavation area measured approximately 190 square feet and 4 feet below ground surface (bgs).

Based on the confirmation soil sample results, excavated soils from Former Drainage Ditch B were contained in two roll-offs staged onsite. Composite soil sample analytical results (see **Appendix A**) from the two roll-offs indicated excavated soils from Former Drainage Ditch B were to be disposed of as “Hazardous” due to Toxicity Characteristic Leachate Procedure (TCLP) Lead concentrations of 14.4 milligrams per liter (mg/L) and 15.3 mg/L in each respective roll-off (the Maximum Concentration of Lead for the Toxicity Characteristic is 5.0 mg/L). On September 10, 2009, both roll-offs (a total of 25.20 tons of impacted soil) were transported from the Site and disposed of at MAX Environmental Technologies, Inc. located in Yukon, Pennsylvania. Hazardous waste disposal manifests for the transported soils are included within **Appendix B**. A photographic log depicting excavation activities within Former Drainage Ditch B is located in **Appendix C**.

Based on confirmation soil samples (D-8 through D-12), further soil characterization was necessary to establish lateral boundaries of impacted soil in respect to the PRHBSRG and PGPSRG, specifically along the western boundary where additional excavation could possibly undermine the integrity of the nearby building (see **Figure 2**).

3.2 SOIL ASSESSMENT – AUGUST/OCTOBER 2009, JULY/OCTOBER 2011

Additional soil characterization of the Former Drainage Ditch B Area was completed on the below dates. Locations of the soil borings installed as part of these soil characterization activities are shown in **Figure 2**.

- August 13, 2009;
 - Soil borings D-13 thru D-27;
- October 9, 2009;
 - Soil borings D-28 thru D-33 (soil boring D-29 is not shown because the soil sample was not analyzed from this location);
- July 12, 2011;
 - Soil borings SS-1 thru SS-4;
- October 17, 2011;
 - Soil borings IB-1 thru IB-6 (Soil borings IB-3, IB-4 and IB-6 are not shown because the soil samples were not analyzed from these boring locations);

Soil borings were advanced with a hand auger or Geoprobe drilling rig. Soil from each sample interval was logged, visually inspected for stains/discoloration and screened for organic vapors using a Photoionization Detector (PID). Soil samples were collected and submitted to the laboratory for Base Neutrals according to EPA method 8270 and Chromium and Lead according to EPA method 6010. Soil samples were submitted to Pace Analytical Laboratory (Pace) of Huntersville, NC, a NCDEQ approved laboratory. Some soil samples were not analyzed based on exceedances of Base Neutrals or Chromium/ Lead at the same boring location. Analytical laboratory reports for the above soil sampling events were included within Attachment A of the *Containment Remedy Notification Letter* dated June 19, 2015. Collected soil sample data and their respective location is shown in **Figure 2**. After the additional assessment was performed, remedial options were evaluated in respect of meeting the PRHBSRG and PGPSRG.

3.3 REMEDIAL OPTIONS EVALUATION

3.3.1 Adjusted Residential Final Health-Based Soil Remediation Goals

In accordance with Appendix E.2 of the Registered Environmental Consultant Program Implementation Guidance, URS attempted to demonstrate attainment of the PRHBSRG through Adjustment Procedures for Final Health Based Soil Remediation Goals. However, concentrations of Benzo(a)pyrene were too high and exceeded the Adjusted Final Health Based Soil Remediation Goals calculated for the analyte. A strategy for removing the highest concentration of Benzopyrene was evaluated.

3.3.2 Attainment of Health Based Soil Remediation Goals through Averaging Contaminant Concentrations

In accordance with Appendix E.3 of the Registered Environmental Consultant Program Implementation Guidance, URS attempted to demonstrate attainment of the PRHBSRG through Averaging Contaminant Concentrations. Averaging calculations exceeded the PRHBSRG due to the concentration of certain COCs at boring location D-24, as indicated on **Figure 2**.

On September 26, 2012, Hepaco began excavating soils at boring location D-24 under the supervision of URS (now AECOM) personnel. Confirmation soil samples, D24-Excavation 1 and D24-Excavation 2 (bottom of the excavation samples), were analyzed for Semi-Volatile Organic Compounds by EPA method 8270 and Metals by EPA method 6010. Locations of soil samples D24-Excavation-1 and D24-Excavation-2 are shown in **Figure 2**. The excavation area completed on September 26, 2012, measured 25 square feet and approximately 4 feet bgs.

Based on the TCLP results from 2009, excavated soils were contained in one roll-off staged onsite. On October 16, 2012, the roll-off containing 7 tons of impacted soil was transported from the site and disposed of at Envirite of Ohio, Inc. located in Canton, Ohio. The disposal manifest for transported soils is included within **Appendix B**. A photographic log depicting excavation activities within Former Drainage Ditch B is located in **Appendix C**.

The concentrations of Chromium and Benzo(a)pyrene within post excavation soil samples D24-Excavation 1 and D24-Excavation 2 were too high to attain the PRHBSRG through Averaging. **Table 1** shows the results from both soil samples. Laboratory analytical data for both samples was included in Attachment A of the *Containment Remedy Notification Letter* dated June 19, 2015.

3.3.3 Adjusted Industrial Health-Based Soil Remediation Goals and Notice of Containment

Based on exceedances in soil quality for Adjusted Residential Final Health-Based Soil Remediation Goals and Averaging contaminant concentrations, AECOM chose to implement a containment remedy for soils in Former Drainage Ditch B area as the PRHBSRG (unrestricted use) could not be met. Adjusted Industrial

Health Based Soil Remediation Goals were calculated to define the area requiring Land Use Restrictions (LUR).

Using the soil data collected to date in Former Drainage Ditch B area, URS calculated the Adjusted Preliminary Industrial Health Based Soil Remediation Goals (PIHBSRG) in accordance with Appendix E.2 of the REC Program *Implementation Guidance*, November 2014. Each COC was adjusted based on the number of carcinogenic analytes detected within the former Drainage Ditch B Area. COCs which are carcinogenic were adjusted by the following formula:

$$\text{Adjusted Carcinogenic PIHBSRG} = \frac{\text{PIHBSRG} \times 100}{12}$$

The denominator (12) represents the number of carcinogens present within the former Drainage Ditch B area, which include: Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Bis (2-ethylhexyl) Phthalate, Butylbenzylphthalate, Chrysene, Dibenz(a,h)anthracene, Indeno(1,2,3-cd)pyrene, Naphthalene, Arsenic and Chromium.

COCs which are non-carcinogenic (Acenaphthene, Anthracene, Bis (2-ethylhexyl) Phthalate, Dibenzofuran, Di-n-butylphthalate, Fluoranthene, Fluorene, Pyrene, Barium, Cadmium, Lead, Selenium, Silver, and Mercury) were adjusted by the following formula:

$$\text{Adjusted Non - Carcinogenic PIHBSRG} = \frac{\text{PIHBSRG} \times 5}{14}$$

The denominator (14) represents the number of non-carcinogens present within the former Drainage Ditch B area.

COCs that have both carcinogenic and non-carcinogenic characteristics (Bis (2-ethylhexyl) phthalate) were adjusted by the following formula:

$$\text{Adjusted Non - Carcinogenic PIHBSRG} = \frac{\text{EPA Non-Carcinogenic SL}}{14}$$

The denominator (14) represents the number of non-carcinogens present within the former Drainage Ditch B area. The calculated adjusted PIHBSRG for COCs in the area are shown within **Table 1**. The September 2014 Inactive Hazardous Sites Branch Preliminary Soil Remediation Goals Table was used to obtain PRHBSRG and the PIHBSRG values. AECOM used the calculated adjusted PIHBSRG to define the area requiring Land Use Restrictions.

Using the calculated adjusted IHBSRG exceedances of Chromium were still not delineated underneath the onsite building.

3.3.3.1 Soil Assessment – May 2015

Supplemental soil data was collected inside the onsite building on May 29, 2015, to further evaluate the extent of soils exhibiting Chromium concentrations above the PIHBSRG. Soil boring locations IB-9 and IB-10 were concrete cored and advanced with a hand auger. Soil samples were collected and analyzed for Chromium by EPA method 6010.

Soil from each sample interval was logged, visually inspected for stains/discoloration and screened for organic vapors using a PID. Analytical laboratory reports for the above soil sampling events were included within Attachment A of the *Containment Remedy Notification Letter* dated June 19, 2015. Collected soil sample data and their locations are shown in **Figure 2**. Soil samples were submitted to Pace of Huntersville, NC, a NCDEQ approved laboratory.

Based on the soil sample results, AECOM defined the area requiring LUR as both soil sample results indicated concentrations of Chromium below the Adjusted PIHBSRG.

3.3.3.2 Leach to Groundwater

In addition to the applicable Health Based Soil Remediation Goal, affected soil must also meet the Protection of Groundwater Preliminary Soil Remediation Goal. In accordance with the *REC Program Implementation Guidance, October 2015* residual soil impacts that exceed the Protection of Groundwater Preliminary Soil Remediation Goal can remain in place provided the REC can prove the release occurred over 15 years ago and constituents of concern and any daughter products in groundwater do not leach contaminants in excess of the NCAC 2L Groundwater Standards (2L).

As all onsite disposal and releases of hazardous substances in the Former Drainage Ditch B area occurred before initial soil excavation activities in the Former Drainage Ditch B area in 1993 (documented in the *Phase II Remedial Investigation Workplan*, URS Corporation, April 2005 and Volume II Section 5, *Soil Excavation Closure Report*; Turner, Hart & Hickman, 1996)) it can be deduced that soil impacts are greater than 23 years old.

In demonstration that the identified soil COCs have not been detected in groundwater beneath the Former Drainage Ditch B area, groundwater samples have been collected from both monitoring well MW-3 (downgradient from the Former Drainage Ditch B area) and monitoring well MW-8 (source area monitoring well for Former Drainage Ditch B area) on the following dates for the following parameters:

Monitoring Well MW-3

- October 27, 2011
 - Semi-volatile Organic Compounds according to EPA method 8270
 - Total and Dissolved Chromium and Lead according to EPA method 6010
- October 29, 2012
 - Semi-volatile Organic Compounds according to EPA method 8270
 - Dissolved Cadmium, Chromium and Lead according to EPA method 6010
- January 9, 2015
 - Total Cadmium according to EPA method 6010

Results from all three sampling events are either less than the laboratory reporting limit, or less than the respective 2L for the identified COCs.

Monitoring Well MW-8

- October 29, 2012
 - Semi-volatile Organic Compounds according to EPA method 8270
 - Dissolved Cadmium, Chromium and Lead according to EPA method 6010

- March 5, 2014
 - Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene and Bis(2-ethylhexyl) Phthalate according to EPA method 8270
 - Total Chromium and Lead according to EPA method 6010
 - Dissolved Chromium and Lead according to EPA method 6010
- January 9, 2015
 - Total Cadmium according to EPA method 6010

Results from all three sampling events are either less than the laboratory reporting limit, or less than the respective 2L for the COCs.

The locations of monitoring wells MW-3 and MW-8 in respect to the Former Drainage Ditch B area are shown in **Figure 2**. The analytical laboratory reports for collected water samples from monitoring wells MW-3 and MW-8 are located within Attachment A of the *Containment Remedy Notification Letter* dated June 19, 2015.

Based on the collected groundwater data from monitoring wells MW-3 and MW-8, soil COCs in the Former Drainage Ditch B area have not leached into groundwater above the respective 2L.

4.0 CONTAINMENT REMEDY

4.1 CONTAINMENT REMEDY NOTIFICATION LETTER

In accordance with the procedures for implementing Land Use Restrictions (Appendix F of the REC Program Rules and Implementation Guidance), AECOM submitted the *Containment Remedy Notification Letter* to NCDEQ on June 19, 2015. AECOM received concurrence from NCDEQ via electronic correspondence on February 26, 2016. The concurrence electronic correspondence from NCDEQ is included in **Appendix D**.

4.2 DECLARATION OF PERPETUAL LAND USE RESTRICTIONS

In accordance with the procedures for preparing a Declaration of Perpetual Land Use Restrictions (DPLUR) document (Appendix F.5 of REC Program Rules and Implementation Guidance), NCDEQ transmitted a draft DPLUR document to AECOM on September 8, 2015. The draft document was reviewed by Carolina Properties and sent back to NCDEQ with changes specific to the Site on October 14, 2015. The language was finalized by NCDEQ and sent back to the property owner on December 14, 2015. The final DPLUR is included as **Appendix E**.

After the public comment period for this document, a certified copy of the DPLUR on file with the Mecklenburg County Register of Deeds will be sent to NCDEQ in a Completion Report. A photo log displaying signs referenced within the DPLUR will be included in the Completion Report.

Annual inspections will be conducted by Carolina Properties to verify the existing conditions and to verify land restrictions are still in effect and on file at the Mecklenburg County Register of Deeds office. The annual inspection will include completing the Annual Report Form for Perpetual Land Use Restrictions (Attachment F-2 within REC Program Rules and Implementation Guidance).

4.3 NOTICE OF AN INACTIVE HAZARDOUS SUBSTANCE OR WASTE DISPOSAL SITE

In accordance with Appendix F.6 of REC Program Rules and Implementation Guidance, AECOM submitted a draft *Notice of an Inactive Hazardous Substance or Waste Disposal Site (Notice)* to NCDEQ on January 25, 2016. The draft document was reviewed by NCDEQ and sent back to AECOM on February 26, 2016. Requested edits by NCDEQ have been addressed by AECOM. The final version of the *Notice* is included in **Appendix F**. After the public comment period for this document, a certified copy of the *Notice* on file with the Mecklenburg County Register of Deeds will be sent to NCDEQ in a Completion Report.

5.0 EVALUATION OF PROPOSED CONTAINMENT REMEDY

The revised remedy for the Former Drainage Ditch B Area protects human health and the environment by completely eliminating the potential for direct human contact, inhalation, or ingestion. Also, COCs within Former Drainage Ditch B area have not leached to groundwater as discussed within the *Containment Remedy Notification Letter* dated June 19, 2015. Based on the protection of human health, and impacts not leaching to groundwater, the proposed remediation alternative is compliant with NCDEQ requirements.

6.0 REFERENCES

URS; Phase I Remedial Investigation Work Plan, 2002

URS; Remedial Action Plan, February 2008

URS; Soil Remedial Action Completion Report: Former Drainage Ditch A, Former Compactor and Former Dry Well Areas, October 2014.

AECOM; Containment Remedy Notification Letter, June 2015.

NCDEQ IHSB; Registered Environmental Consultant Program – Rules and Implementation Guidance, October 2015.

TABLE

TABLE 1
Existing Soil Analytical Results
Former Drainage Ditch B - Former Flint Ink Facility
515 South Turner Avenue
Charlotte, North Carolina

Boring Location						D-8	D-9	D-10	D-11	D-12	D-13	D-14	D-15	D-16	D-17	D-18	D-19	D-20	D-21	
Sample Depth (ft bgs)						Sidewall Composite	Sidewall Composite	Sidewall Composite	Sidewall Composite	Bottom Composite	Composite 0-4'	Composite 0-4.5'	Composite 0-6'	Composite 0-3'	Composite 0-3.5'	Composite 0-2'	Composite 0-2'	Composite 0-3'	Composite 0-2.5'	
Sample Date:						7/21/2009	7/21/2009	7/21/2009	7/21/2009	7/21/2009	8/13/2009	8/13/2009	8/13/2009	8/13/2009	8/13/2009	8/13/2009	8/13/2009	8/13/2009	8/13/2009	8/13/2009
SVOCs	Carcinogenic or Non-Carcinogenic	Preliminary Residential Health Based Soil Remediation Goal (mg/kg)	Adjusted Preliminary Residential Health Based Soil Remediation Goal (mg/kg)	Adjusted Preliminary Industrial Health Based Soil Remediation Goal (mg/kg)	Site Specific Background (2xMEAN) (mg/kg)															
Acenaphthene	N	700	269.23	3,461.54	NC	0.630J	< 1.86	< 1.91	< 1.79	0.16J	0.179J	< 0.564	< 0.355	NA	NA	< 0.555	< 0.544	0.184J	< 0.356	
Anthracene	N	3400	1,307.69	17,692.31	NC	1.83J	< 1.86	0.435J	0.865J	0.444	0.393J	< 0.564	< 0.355	NA	NA	0.406J	< 0.544	0.645	< 0.356	
Benzo(a)anthracene	C,M	0.15	1.25	24.17	NC	3.35	< 1.86	0.839J	1.73J	0.749	0.545	< 0.564	< 0.355	NA	NA	0.820	< 0.544	< 0.556	< 0.356	
Benzo(a)pyrene	C,M	0.015	0.125	2.42	NC	2.69	< 1.86	0.717J	1.32J	0.59	0.566	< 0.564	< 0.355	NA	NA	0.846	0.279J	0.824	< 0.356	
Benzo(b)fluoranthene	C,M	0.15	1.25	24.17	NC	3.36	1.16J	1.66J	2.19	0.748	0.799	< 0.564	< 0.355	NA	NA	0.752	0.155J	0.763	< 0.356	
Benzo(g,h,i)perylene	Not Applicable	NE	NE	NE	NC	1.13J	< 1.86	< 1.91	0.727J	0.309J	< 0.414	< 0.564	< 0.355	NA	NA	0.268J	< 0.544	< 0.556	< 0.356	
Benzo(k)fluoranthene	C,M	1.5	12.50	241.67	NC	2.15	1.02J	1.23J	1.36J	0.392	0.444	< 0.564	< 0.355	NA	NA	1.00	0.220J	1.08	< 0.356	
Bis (2-ethylhexyl) Phthalate	C,N	38.0	92.31	1,230.77	NC	75.7	134	31.8	17.8	0.873	6.03	4.87	0.0976J	NA	NA	0.578	0.674	10.7	0.822	
Butylbenzylphthalate	C	280	2,333.33	10,000	NC	< 1.87	< 1.86	< 1.91	< 1.79	< 0.384	< 0.414	< 0.564	< 0.355	NA	NA	< 0.555	< 0.544	< 0.556	< 0.356	
Chrysene	C	15.0	125.00	2,416.67	NC	3.51	< 1.86	0.93J	1.8	0.778	0.497	< 0.564	< 0.355	NA	NA	0.945	0.259J	0.817	0.0501J	
Dibenzo(a,h)anthracene	C	0.015	0.125	2.42	NC	< 1.87	< 1.86	< 1.91	< 1.79	0.0915J	< 0.414	< 0.564	< 0.355	NA	NA	< 0.555	< 0.544	< 0.556	< 0.356	
Dibenzofuran	N	14.0	5.38	76.92	NC	< 1.87	< 1.86	< 1.91	< 1.79	< 0.384	0.136J	< 0.564	< 0.355	NA	NA	< 0.555	< 0.544	0.130J	< 0.356	
Di-n-butylphthalate	N	1200	461.54	461.54	NC	< 1.87	0.364J	1.1J	2.09	< 0.384	< 0.414	< 0.564	< 0.355	NA	NA	< 0.555	< 0.544	0.150J	< 0.356	
Fluoranthene	N	460	176.92	2,307.69	NC	7.03	0.367J	1.64J	3.29	1.66	1.17	0.117J	< 0.355	NA	NA	1.38	0.365J	1.73	< 0.356	
Fluorene	N	460	176.92	2,307.69	NC	0.716J	< 1.86	< 1.91	< 1.79	0.137J	0.301J	< 0.564	< 0.355	NA	NA	0.186J	< 0.544	0.323J	< 0.356	
Indeno(1,2,3-cd)pyrene	C	0.15	1.25	24.17	NC	0.963J	< 1.86	< 1.91	0.573J	0.223J	< 0.414	< 0.564	< 0.355	NA	NA	< 0.555	< 0.544	< 0.556	< 0.356	
Phenanthrene	Not Applicable	NE	NE	NE	NC	5.68	< 1.86	1.37J	2.66	1.24	1.45	< 0.564	< 0.355	NA	NA	< 0.555	0.277J	2.02	< 0.356	
Pyrene	N	340	130.77	1,769.23	NC	7.4	0.501J	1.9J	3.82	1.85	0.958	0.134J	< 0.355	NA	NA	1.33	0.495J	1.41	0.0627J	
Naphthalene	C	3.8	31.67	141.67	NC	< 1.87	< 1.86	< 1.91	< 1.79	< 0.384	< 0.414	< 0.564	< 0.355	NA	NA	< 0.555	< 0.544	< 0.556	< 0.356	
Metals																				
Arsenic	C	0.67	5.58	25.00	1.12															
Barium	N	3000	1,153.85	16,923.08	230															
Cadmium	N	14.0	5.38	76.92	0.2															
Chromium	C,M	0.3	2.50	52.50	127.37	94.7	382	4,690	66.8	22.7	52.6	50.5	24.8	99.6	146	37.8	53.8	38.1	32.9	
Lead	N	400	-	-	3.61	338	1710	17,400	215	30.6	168	143	37.7	494	511	53.6	77.5	92.1	70.5	
Selenium	N	78	30.00	461.54	NC															
Silver	N	78	30.00	461.54	0.4															
Mercury	N	1.9	0.73	1.19	NC															

Notes:

Results expressed in milligrams per kilograms or ppm.

ft bgs - feet below ground surface

C - Carcinogenic

N - Non-Carcinogenic

M - Mutagenic

J - Estimated value

SVOC - Semi-volatile organic compounds

NC - not calculated

NA - the constituent was not analyzed

NE - the action level does not exist

Data in **bold red text** for all constituents except Chromium exceeds the Adjusted Preliminary Industrial Health Based Soil Remediation Goal.

Data in **bold red text** for Chromium exceeds the Calculated Site Specific Background Concentration.

TABLE 1
Existing Soil Analytical Results
Former Drainage Ditch B - Former Flint Ink Facility
515 South Turner Avenue
Charlotte, North Carolina

Boring Location						D-22	D-23	D-25	D-26	D-27	D-28	D-30	D-31
Sample Depth (ft bgs)						Composite 0-4'	Composite 0-3.5'	Composite 0-4'	Composite 0-4'	Composite 0-4.5'	Composite 0-5'	Composite 0-5'	Composite 0-4'
Sample Date:						8/13/2009	8/13/2009	8/13/2009	8/13/2009	8/13/2009	10/9/2009	10/9/2009	10/9/2009
SVOCs	Carcinogenic or Non-Carcinogenic	Preliminary Residential Health Based Soil Remediation Goal (mg/kg)	Adjusted Preliminary Residential Health Based Soil Remediation Goal (mg/kg)	Adjusted Preliminary Industrial Health Based Soil Remediation Goal (mg/kg)	Site Specific Background (2xMEAN) (mg/kg)								
Acenaphthene	N	700	269.23	3,461.54	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Anthracene	N	3400	1,307.69	17,692.31	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Benzo(a)anthracene	C,M	0.15	1.25	24.17	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Benzo(a)pyrene	C,M	0.015	0.125	2.42	NC	NA	NA	< 0.438	NA	NA	< 0.421	0.205J	0.196J
Benzo(b)fluoranthene	C,M	0.15	1.25	24.17	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Benzo(g,h,i)perylene	Not Applicable	NE	NE	NE	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Benzo(k)fluoranthene	C,M	1.5	12.50	241.67	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Bis (2-ethylhexyl) Phthalate	C,N	38.0	92.31	1,230.77	NC	NA	NA	2.08	NA	NA	< 0.421	< 0.384	0.325J
Butylbenzylphthalate	C	280	2,333.33	10,000	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	1.08
Chrysene	C	15.0	125.00	2,416.67	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Dibenz(a,h)anthracene	C	0.015	0.125	2.42	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Dibenzofuran	N	14.0	5.38	76.92	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Di-n-butylphthalate	N	1200	461.54	461.54	NC	NA	NA	< 0.438	NA	NA	< 0.421	0.0745J	0.0683J
Fluoranthene	N	460	176.92	2,307.69	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Fluorene	N	460	176.92	2,307.69	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Indeno(1,2,3-cd)pyrene	C	0.15	1.25	24.17	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Phenanthrene	Not Applicable	NE	NE	NE	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Pyrene	N	340	130.77	1,769.23	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Naphthalene	C	3.8	31.67	141.67	NC	NA	NA	< 0.438	NA	NA	< 0.421	< 0.384	< 0.362
Metals													
Arsenic	C	0.67	5.58	25.00	1.12								
Barium	N	3000	1,153.85	16,923.08	230								
Cadmium	N	14.0	5.38	76.92	0.2								
Chromium	C,M	0.3	2.50	52.50	127.37	182	209	60.9	137	227	21.1	25.9	28.5
Lead	N	400	-	-	3.61	715	859	120	641	815	110	2.8	6.0
Selenium	N	78	30.00	461.54	NC								
Silver	N	78	30.00	461.54	0.4								
Mercury	N	1.9	0.73	1.19	NC								

Notes:

Results expressed in milligrams per kilograms or ppm.

ft bgs - feet below ground surface

C - Carcinogenic

N - Non-Carcinogenic

M - Mutagenic

J - Estimated value

SVOC - Semi-volatile organic compounds

NC - not calculated

NA - the constituent was not analyzed

NE - the action level does not exist

Data in **bold red text** for all constituents except Chromium exceeds the Adjusted Preliminary Industrial Health Based Soil Remediation Goal.

Data in **bold red text** for Chromium exceeds the Calculated Site Specific Background Concentration.

TABLE 1
Existing Soil Analytical Results
Former Drainage Ditch B - Former Flint Ink Facility
515 South Turner Avenue
Charlotte, North Carolina

Boring Location						D-32	D-33	SS-1	SS-2	SS-3	SS-4	IB-1	IB-2	IB-5	D24-Excavation 1	D24-Excavation 2	IB-9	IB-10	
Sample Depth (ft bgs)						Composite 0-4'	Composite 0-3'	Composite 0-5'	Composite 0-5'	Composite 0-5'	Composite 0-5'	0-1.5'	0-1.5'	0-2.5'	3.5-4'	3.5-4'	0-2'	0-1'	
Sample Date:						10/9/2009	10/9/2009	7/12/2011	7/12/2011	7/12/2011	7/12/2011	10/17/2011	10/17/2011	10/17/2011	9/26/2012	9/26/2012	5/29/2015	5/29/2015	
SVOCs	Carcinogenic or Non-Carcinogenic	Preliminary Residential Health Based Soil Remediation Goal (mg/kg)	Adjusted Preliminary Residential Health Based Soil Remediation Goal (mg/kg)	Adjusted Preliminary Industrial Health Based Soil Remediation Goal (mg/kg)	Site Specific Background (2xMEAN) (mg/kg)														
Acenaphthene	N	700	269.23	3,461.54	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	< 0.386	< 0.384	NA	NA	
Anthracene	N	3400	1,307.69	17,692.31	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	0.575	< 0.384	NA	NA	
Benzo(a)anthracene	C,M	0.15	1.25	24.17	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	1.65	< 0.384	NA	NA	
Benzo(a)pyrene	C,M	0.015	0.125	2.42	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	1.51	< 0.384	NA	NA	
Benzo(b)fluoranthene	C,M	0.15	1.25	24.17	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	1.51	< 0.384	NA	NA	
Benzo(g,h,i)perylene	Not Applicable	NE	NE	NE	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	0.925	< 0.384	NA	NA	
Benzo(k)fluoranthene	C,M	1.5	12.50	241.67	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	1.15	< 0.384	NA	NA	
Bis (2-ethylhexyl) Phthalate	C,N	38.0	92.31	1,230.77	NC	< 0.344	5.9	NA	NA	NA	NA	NA	NA	NA	1.81	14.3	NA	NA	
Butylbenzylphthalate	C	280	2,333.33	10,000	NC	< 0.344	< 0.357	NA	NA	NA	NA	NA	NA	NA	< 0.386	< 0.384	NA	NA	
Chrysene	C	15.0	125.00	2,416.67	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	1.69	< 0.384	NA	NA	
Dibenz(a,h)anthracene	C	0.015	0.125	2.42	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	0.465	< 0.384	NA	NA	
Dibenzofuran	N	14.0	5.38	76.92	NC	< 0.344	< 0.357	NA	NA	NA	NA	NA	NA	NA	< 0.386	< 0.384	NA	NA	
Di-n-butylphthalate	N	1200	461.54	461.54	NC	< 0.344	0.258J	NA	NA	NA	NA	NA	NA	NA	< 0.386	< 0.384	NA	NA	
Fluoranthene	N	460	176.92	2,307.69	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	3.77	< 0.384	NA	NA	
Fluorene	N	460	176.92	2,307.69	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	< 0.386	< 0.384	NA	NA	
Indeno(1,2,3-cd)pyrene	C	0.15	1.25	24.17	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	0.861	< 0.384	NA	NA	
Phenanthrene	Not Applicable	NE	NE	NE	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	1.79	< 0.384	NA	NA	
Pyrene	N	340	130.77	1,769.23	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	2.15	< 0.384	NA	NA	
Naphthalene	C	3.8	31.67	141.67	NC	< 0.344	< 0.357	< 0.472	< 0.474	< 0.368	< 0.410	NA	NA	NA	< 0.386	< 0.384	NA	NA	
Metals																			
Arsenic	C	0.67	5.58	25.00	1.12											< 1.1	< 1.0	NA	NA
Barium	N	3000	1,153.85	16,923.08	230											139	189	NA	NA
Cadmium	N	14.0	5.38	76.92	0.2											3.4	4.4	NA	NA
Chromium	C,M	0.3	2.50	52.50	127.37	28.6	46.3	13.4	49.6	30.0	39.1	222	37.3	NA	100	141	37.3	42.4	
Lead	N	400	-	-	3.61	14.4	218	7.1	11.7	10.1	11.3	2.3	4.6	4.4	253	377	NA	NA	
Selenium	N	78	30.00	461.54	NC											1.6	1.6	NA	NA
Silver	N	78	30.00	461.54	0.4											< 0.54	< 0.52	NA	NA
Mercury	N	1.9	0.73	1.19	NC											0.0076	0.0066	NA	NA

Notes:
Results expressed in milligrams per kilograms or ppm.
ft bgs - feet below ground surface
C - Carcinogenic
N - Non-Carcinogenic
M - Mutagenic
J - Estimated value
SVOC - Semi-volatile organic compounds
NC - not calculated
NA - the constituent was not analyzed
NE - the action level does not exist
Data in **bold red text** for all constituents except Chromium exceeds the Adjusted Preliminary Industrial Health Based Soil Remediation Goal.
Data in **bold red text** for Chromium exceeds the Calculated Site Specific Background Concentration.

FIGURES

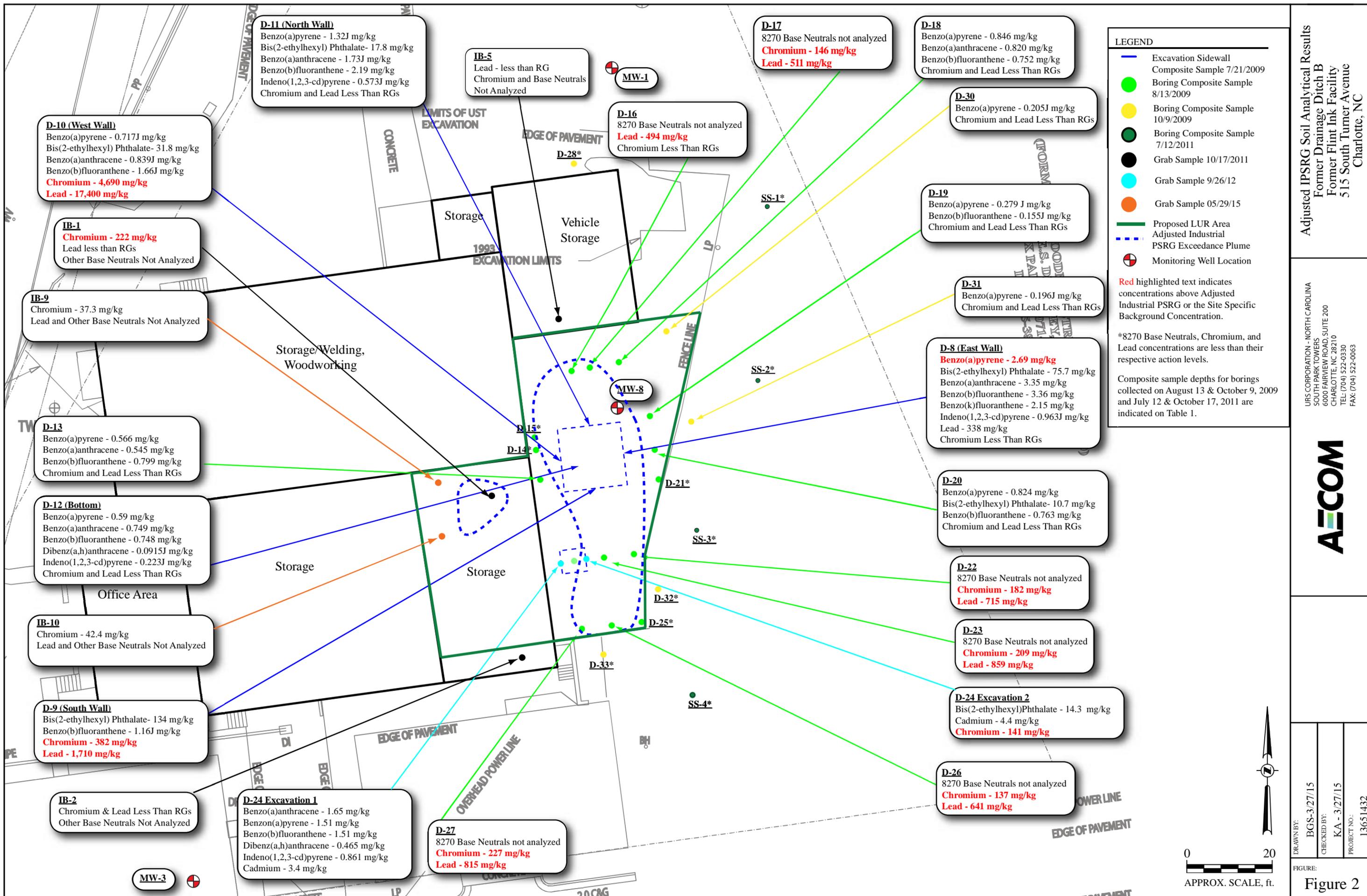
0 40
APPROX. SCALE, ft.



FIGURE 1

DRAWN BY: BGS	
CHECKED BY: KA	
PROJECT NO.: 60408261	
SITE LOCATION MAP	
AECOM	
AECOM 6000 FAIRVIEW ROAD, SUITE 200 CHARLOTTE, NC 28210 TEL: (704) 522-0330 FAX: (704) 522-0063	

**FORMER FLINT INK FACILITY
515 SOUTH TURNER AVENUE
CHARLOTTE, NORTH CAROLINA**



LEGEND

- Excavation Sidewall
- Composite Sample 7/21/2009
- Boring Composite Sample 8/13/2009
- Boring Composite Sample 10/9/2009
- Boring Composite Sample 7/12/2011
- Grab Sample 10/17/2011
- Grab Sample 9/26/12
- Grab Sample 05/29/15
- Proposed LUR Area
- Adjusted Industrial PSRG Exceedance Plume
- Monitoring Well Location

Red highlighted text indicates concentrations above Adjusted Industrial PSRG or the Site Specific Background Concentration.

*8270 Base Neutrals, Chromium, and Lead concentrations are less than their respective action levels.

Composite sample depths for borings collected on August 13 & October 9, 2009 and July 12 & October 17, 2011 are indicated on Table 1.

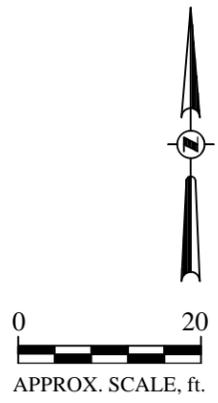
Adjusted IPSRG Soil Analytical Results
 Former Drainage Ditch B
 Former Flint Ink Facility
 515 South Turner Avenue
 Charlotte, NC

URS CORPORATION - NORTH CAROLINA
 SOUTH PARK TOWERS
 6000 FAIRVIEW ROAD, SUITE 200
 CHARLOTTE, NC 28210
 TEL: (704) 522-0330
 FAX: (704) 522-0063

AECOM

DRAWN BY: BGS-3/27/15
 CHECKED BY: KA - 3/27/15
 PROJECT NO.: 13651432

FIGURE:
Figure 2



APPENDIX A
LABORATORY DATA

July 31, 2009

Kristine MacWilliams
URS Corporation
PO Box 203970
Austin, TX 78720

RE: Project: Flint Ink
Pace Project No.: 9249422

Dear Kristine MacWilliams:

Enclosed are the analytical results for sample(s) received by the laboratory on July 24, 2009. The results relate only to the samples included in this report. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

Inorganic Wet Chemistry and Metals analyses were performed at our Pace Asheville laboratory and Organic testing was performed at our Pace Huntersville laboratory unless otherwise footnoted. All Microbiological analyses were performed at the laboratory where the samples were received.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Kevin Herring

kevin.herring@pacelabs.com
Project Manager

Enclosures

cc: Mr. Mark Fox, URS Corporation
Ms. Martha Myers-Lee, URS Corporation

REPORT OF LABORATORY ANALYSIS

Page 1 of 21

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, Inc..



CERTIFICATIONS

Project: Flint Ink
Pace Project No.: 9249422

Charlotte Certification IDs

Connecticut Certification #: PH-0104
Florida/NELAP Certification #: E87627
West Virginia Certification #: 357
Virginia Certification #: 00213
Tennessee Certification #: 04010
South Carolina Drinking Water Cert. #: 990060003
South Carolina Certification #: 990060001

Pennsylvania Certification #: 68-00784
North Carolina Wastewater Certification #: 12
North Carolina Field Services Certification #: 5342
North Carolina Drinking Water Certification #: 37706
New Jersey Certification #: NC012
Louisiana/LELAP Certification #: 04034
Kentucky UST Certification #: 84

Asheville Certification IDs

Connecticut Certification #: PH-0106
Virginia Certification #: 00072
Tennessee Certification #: 2980
South Carolina Certification #: 99030001
South Carolina Bioassay Certification #: 99030002
Pennsylvania Certification #: 68-03578
West Virginia Certification #: 356

North Carolina Drinking Water Certification #: 37712
North Carolina Bioassay Certification #: 9
New Jersey Certification #: NC011
Massachusetts Certification #: M-NC030
Louisiana/LELAP Certification #: 03095
Florida/NELAP Certification #: E87648
North Carolina Wastewater Certification #: 40

REPORT OF LABORATORY ANALYSIS

Page 2 of 21

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, Inc..

SAMPLE SUMMARY

Project: Flint Ink
Pace Project No.: 9249422

Lab ID	Sample ID	Matrix	Date Collected	Date Received
9249422001	Roll-off 1	Solid	07/24/09 12:45	07/24/09 15:25
9249422002	Roll-off 2	Solid	07/24/09 13:10	07/24/09 15:25

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, Inc..

SAMPLE ANALYTE COUNT

Project: Flint Ink
Pace Project No.: 9249422

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
9249422001	Roll-off 1	ASTM D2974-87	KDF	1	PASI-C
		EPA 6010	SHB	7	PASI-A
		EPA 7470	SAJ	1	PASI-A
		EPA 8270	BET	18	PASI-C
9249422002	Roll-off 2	ASTM D2974-87	KDF	1	PASI-C
		EPA 6010	SHB	7	PASI-A
		EPA 7470	SAJ	1	PASI-A
		EPA 8270	BET	18	PASI-C

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, Inc..

PROJECT NARRATIVE

Project: Flint Ink
Pace Project No.: 9249422

Method: EPA 6010
Description: 6010 MET ICP, TCLP
Client: URS Corporation
Date: July 31, 2009

General Information:

2 samples were analyzed for EPA 6010. All samples were received in acceptable condition with any exceptions noted below.

Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:

The samples were prepared in accordance with EPA 3010 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

Method Blank:

All analytes were below the report limit in the method blank with any exceptions noted below.

Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

REPORT OF LABORATORY ANALYSIS

Page 5 of 21

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, Inc..

PROJECT NARRATIVE

Project: Flint Ink
Pace Project No.: 9249422

Method: EPA 7470
Description: 7470 Mercury, TCLP
Client: URS Corporation
Date: July 31, 2009

General Information:

2 samples were analyzed for EPA 7470. All samples were received in acceptable condition with any exceptions noted below.

Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:

The samples were prepared in accordance with EPA 7470 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

Method Blank:

All analytes were below the report limit in the method blank with any exceptions noted below.

Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

REPORT OF LABORATORY ANALYSIS

Page 6 of 21

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, Inc..

PROJECT NARRATIVE

Project: Flint Ink
Pace Project No.: 9249422

Method: EPA 8270
Description: 8270 MSSV Microwave
Client: URS Corporation
Date: July 31, 2009

General Information:

2 samples were analyzed for EPA 8270. All samples were received in acceptable condition with any exceptions noted below.

Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:

The samples were prepared in accordance with EPA 3546 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

Internal Standards:

All internal standards were within QC limits with any exceptions noted below.

Surrogates:

All surrogates were within QC limits with any exceptions noted below.

Method Blank:

All analytes were below the report limit in the method blank with any exceptions noted below.

Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, Inc..

PROJECT NARRATIVE

Project: Flint Ink
Pace Project No.: 9249422

Method: EPA 8270
Description: 8270 MSSV TCLP Sep Funnel
Client: URS Corporation
Date: July 31, 2009

General Information:

2 samples were analyzed for EPA 8270. All samples were received in acceptable condition with any exceptions noted below.

Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:

The samples were prepared in accordance with EPA 3510 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

Internal Standards:

All internal standards were within QC limits with any exceptions noted below.

Surrogates:

All surrogates were within QC limits with any exceptions noted below.

Method Blank:

All analytes were below the report limit in the method blank with any exceptions noted below.

Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

REPORT OF LABORATORY ANALYSIS

Page 8 of 21

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, Inc..



PROJECT NARRATIVE

Project: Flint Ink
Pace Project No.: 9249422

Method: ASTM D2974-87
Description: Percent Moisture
Client: URS Corporation
Date: July 31, 2009

General Information:

4 samples were analyzed for ASTM D2974-87. All samples were received in acceptable condition with any exceptions noted below.

Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

Internal Standards:

All internal standards were within QC limits with any exceptions noted below.

Surrogates:

All surrogates were within QC limits with any exceptions noted below.

Method Blank:

All analytes were below the report limit in the method blank with any exceptions noted below.

Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, Inc..

ANALYTICAL RESULTS

Project: Flint Ink
Pace Project No.: 9249422

Sample: Roll-off 1 **Lab ID: 9249422001** Collected: 07/24/09 12:45 Received: 07/24/09 15:25 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	Report Limit	MDL	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, TCLP									
Analytical Method: EPA 6010 Preparation Method: EPA 3010									
Leachate Method/Date: EPA 1311; 07/29/09 10:20									
Arsenic	ND	mg/L	0.025	0.014	1	07/29/09 14:50	07/31/09 00:16	7440-38-2	
Barium	2.6	mg/L	0.025	0.0010	1	07/29/09 14:50	07/31/09 00:16	7440-39-3	Z2
Cadmium	ND	mg/L	0.0050	0.0025	1	07/29/09 14:50	07/31/09 00:16	7440-43-9	
Chromium	0.70	mg/L	0.025	0.0020	1	07/29/09 14:50	07/31/09 00:16	7440-47-3	Z2
Lead	14.4	mg/L	0.025	0.020	1	07/29/09 14:50	07/31/09 00:16	7439-92-1	
Selenium	0.023J	mg/L	0.050	0.019	1	07/29/09 14:50	07/31/09 00:16	7782-49-2	
Silver	0.0036J	mg/L	0.025	0.00050	1	07/29/09 14:50	07/31/09 00:16	7440-22-4	Z2
7470 Mercury, TCLP									
Analytical Method: EPA 7470 Preparation Method: EPA 7470									
Leachate Method/Date: EPA 1311; 07/29/09 10:20									
Mercury	0.13J	ug/L	0.20	0.090	1	07/29/09 10:50	07/29/09 13:42	7439-97-6	
8270 MSSV TCLP Sep Funnel									
Analytical Method: EPA 8270 Preparation Method: EPA 3510									
Leachate Method/Date: EPA 1311; 07/27/09 00:00									
1,4-Dichlorobenzene	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57	106-46-7	
2,4-Dinitrotoluene	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57	121-14-2	
Hexachloro-1,3-butadiene	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57	87-68-3	
Hexachlorobenzene	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57	118-74-1	
Hexachloroethane	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57	67-72-1	
2-Methylphenol(o-Cresol)	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57	95-48-7	
3&4-Methylphenol(m&p Cresol)	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57		
Nitrobenzene	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57	98-95-3	
Pentachlorophenol	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57	87-86-5	
Pyridine	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57	110-86-1	
2,4,5-Trichlorophenol	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57	95-95-4	
2,4,6-Trichlorophenol	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 18:57	88-06-2	
Nitrobenzene-d5 (S)	69 %		30-150		1	07/28/09 00:00	07/28/09 18:57	4165-60-0	
2-Fluorobiphenyl (S)	66 %		30-150		1	07/28/09 00:00	07/28/09 18:57	321-60-8	
Terphenyl-d14 (S)	70 %		30-150		1	07/28/09 00:00	07/28/09 18:57	1718-51-0	
Phenol-d6 (S)	27 %		25-150		1	07/28/09 00:00	07/28/09 18:57	13127-88-3	
2-Fluorophenol (S)	34 %		25-150		1	07/28/09 00:00	07/28/09 18:57	367-12-4	
2,4,6-Tribromophenol (S)	69 %		25-150		1	07/28/09 00:00	07/28/09 18:57	118-79-6	
Percent Moisture									
Analytical Method: ASTM D2974-87									
Percent Moisture	13.3	%	0.10	0.10	1		07/27/09 13:22		

ANALYTICAL RESULTS

Project: Flint Ink

Pace Project No.: 9249422

Sample: Roll-off 2 **Lab ID: 9249422002** Collected: 07/24/09 13:10 Received: 07/24/09 15:25 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	Report Limit	MDL	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, TCLP									
Analytical Method: EPA 6010 Preparation Method: EPA 3010									
Leachate Method/Date: EPA 1311; 07/29/09 10:20									
Arsenic	ND	mg/L	0.025	0.014	1	07/29/09 14:50	07/31/09 00:24	7440-38-2	
Barium	2.3	mg/L	0.025	0.0010	1	07/29/09 14:50	07/31/09 00:24	7440-39-3	Z2
Cadmium	ND	mg/L	0.0050	0.0025	1	07/29/09 14:50	07/31/09 00:24	7440-43-9	
Chromium	1.4	mg/L	0.025	0.0020	1	07/29/09 14:50	07/31/09 00:24	7440-47-3	Z2
Lead	15.3	mg/L	0.025	0.020	1	07/29/09 14:50	07/31/09 00:24	7439-92-1	
Selenium	ND	mg/L	0.050	0.019	1	07/29/09 14:50	07/31/09 00:24	7782-49-2	
Silver	0.0013J	mg/L	0.025	0.00050	1	07/29/09 14:50	07/31/09 00:24	7440-22-4	Z2
7470 Mercury, TCLP									
Analytical Method: EPA 7470 Preparation Method: EPA 7470									
Leachate Method/Date: EPA 1311; 07/29/09 10:20									
Mercury	ND	ug/L	0.20	0.090	1	07/29/09 10:50	07/29/09 13:42	7439-97-6	
8270 MSSV TCLP Sep Funnel									
Analytical Method: EPA 8270 Preparation Method: EPA 3510									
Leachate Method/Date: EPA 1311; 07/27/09 00:00									
1,4-Dichlorobenzene	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22	106-46-7	
2,4-Dinitrotoluene	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22	121-14-2	
Hexachloro-1,3-butadiene	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22	87-68-3	
Hexachlorobenzene	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22	118-74-1	
Hexachloroethane	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22	67-72-1	
2-Methylphenol(o-Cresol)	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22	95-48-7	
3&4-Methylphenol(m&p Cresol)	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22		
Nitrobenzene	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22	98-95-3	
Pentachlorophenol	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22	87-86-5	
Pyridine	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22	110-86-1	
2,4,5-Trichlorophenol	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22	95-95-4	
2,4,6-Trichlorophenol	ND	ug/L	50.0	50.0	1	07/28/09 00:00	07/28/09 19:22	88-06-2	
Nitrobenzene-d5 (S)	49	%	30-150		1	07/28/09 00:00	07/28/09 19:22	4165-60-0	
2-Fluorobiphenyl (S)	47	%	30-150		1	07/28/09 00:00	07/28/09 19:22	321-60-8	
Terphenyl-d14 (S)	67	%	30-150		1	07/28/09 00:00	07/28/09 19:22	1718-51-0	
Phenol-d6 (S)	27	%	25-150		1	07/28/09 00:00	07/28/09 19:22	13127-88-3	
2-Fluorophenol (S)	30	%	25-150		1	07/28/09 00:00	07/28/09 19:22	367-12-4	
2,4,6-Tribromophenol (S)	56	%	25-150		1	07/28/09 00:00	07/28/09 19:22	118-79-6	
Percent Moisture									
Analytical Method: ASTM D2974-87									
Percent Moisture	16.4	%	0.10	0.10	1		07/27/09 13:23		

QUALITY CONTROL DATA

Project: Flint Ink
Pace Project No.: 9249422

QC Batch: OEXT/7509 Analysis Method: EPA 8270
QC Batch Method: EPA 3546 Analysis Description: 8270 Solid MSSV Microwave
Associated Lab Samples: 9249422003, 9249422004

METHOD BLANK: 313871 Matrix: Solid

Associated Lab Samples: 9249422003, 9249422004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
bis(2-Ethylhexyl)phthalate	ug/kg	ND	330	07/30/09 10:54	
2,4,6-Tribromophenol (S)	%	55	44-136	07/30/09 10:54	
2-Fluorobiphenyl (S)	%	50	46-120	07/30/09 10:54	
2-Fluorophenol (S)	%	40	24-120	07/30/09 10:54	
Nitrobenzene-d5 (S)	%	44	30-150	07/30/09 10:54	
Phenol-d6 (S)	%	52	35-120	07/30/09 10:54	
Terphenyl-d14 (S)	%	61	38-108	07/30/09 10:54	

LABORATORY CONTROL SAMPLE: 313872

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
bis(2-Ethylhexyl)phthalate	ug/kg	1670	1370	82	50-150	
2,4,6-Tribromophenol (S)	%			66	44-136	
2-Fluorobiphenyl (S)	%			69	46-120	
2-Fluorophenol (S)	%			53	24-120	
Nitrobenzene-d5 (S)	%			62	30-150	
Phenol-d6 (S)	%			64	35-120	
Terphenyl-d14 (S)	%			68	38-108	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 313873 313874

Parameter	Units	9249422004		313874		MS % Rec	MSD % Rec	% Rec Limits	Max RPD	Qual
		Result	MS Spike Conc.	MSD Spike Conc.	MS Result					
2,4,6-Tribromophenol (S)	%					48	75	44-136		
2-Fluorobiphenyl (S)	%					53	87	46-120		
2-Fluorophenol (S)	%					37	59	24-120		
Nitrobenzene-d5 (S)	%					52	79	30-150		
Phenol-d6 (S)	%					46	74	35-120		
Terphenyl-d14 (S)	%					79	101	38-108		

QUALITY CONTROL DATA

Project: Flint Ink
Pace Project No.: 9249422

QC Batch: OEXT/7523 Analysis Method: EPA 8270
QC Batch Method: EPA 3510 Analysis Description: 8270 TCLP MSSV
Associated Lab Samples: 9249422001, 9249422002

METHOD BLANK: 314192 Matrix: Water
Associated Lab Samples: 9249422001, 9249422002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,4-Dichlorobenzene	ug/L	ND	50.0	07/28/09 18:06	
2,4,5-Trichlorophenol	ug/L	ND	50.0	07/28/09 18:06	
2,4,6-Trichlorophenol	ug/L	ND	50.0	07/28/09 18:06	
2,4-Dinitrotoluene	ug/L	ND	50.0	07/28/09 18:06	
2-Methylphenol(o-Cresol)	ug/L	ND	50.0	07/28/09 18:06	
3&4-Methylphenol(m&p Cresol)	ug/L	ND	50.0	07/28/09 18:06	
Hexachloro-1,3-butadiene	ug/L	ND	50.0	07/28/09 18:06	
Hexachlorobenzene	ug/L	ND	50.0	07/28/09 18:06	
Hexachloroethane	ug/L	ND	50.0	07/28/09 18:06	
Nitrobenzene	ug/L	ND	50.0	07/28/09 18:06	
Pentachlorophenol	ug/L	ND	50.0	07/28/09 18:06	
Pyridine	ug/L	ND	50.0	07/28/09 18:06	
2,4,6-Tribromophenol (S)	%	62	25-150	07/28/09 18:06	
2-Fluorobiphenyl (S)	%	45	30-150	07/28/09 18:06	
2-Fluorophenol (S)	%	29	25-150	07/28/09 18:06	
Nitrobenzene-d5 (S)	%	45	30-150	07/28/09 18:06	
Phenol-d6 (S)	%	30	25-150	07/28/09 18:06	
Terphenyl-d14 (S)	%	65	30-150	07/28/09 18:06	

LABORATORY CONTROL SAMPLE: 314193

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,4-Dichlorobenzene	ug/L	500	252	50	30-150	
2,4,5-Trichlorophenol	ug/L	500	345	69	30-150	
2,4,6-Trichlorophenol	ug/L	500	305	61	30-150	
2,4-Dinitrotoluene	ug/L	500	431	86	30-150	
2-Methylphenol(o-Cresol)	ug/L	500	232	46	30-150	
3&4-Methylphenol(m&p Cresol)	ug/L	500	261	52	30-150	
Hexachloro-1,3-butadiene	ug/L	500	313	63	30-150	
Hexachlorobenzene	ug/L	500	400	80	30-150	
Hexachloroethane	ug/L	500	265	53	30-150	
Nitrobenzene	ug/L	500	337	67	30-150	
Pentachlorophenol	ug/L	500	399	80	30-150	
Pyridine	ug/L	500	159	32	30-150	
2,4,6-Tribromophenol (S)	%			81	25-150	
2-Fluorobiphenyl (S)	%			60	30-150	
2-Fluorophenol (S)	%			33	25-150	
Nitrobenzene-d5 (S)	%			56	30-150	
Phenol-d6 (S)	%			35	25-150	
Terphenyl-d14 (S)	%			82	30-150	

QUALITY CONTROL DATA

Project: Flint Ink

Pace Project No.: 9249422

QC Batch: MERP/2297

Analysis Method: EPA 7470

QC Batch Method: EPA 7470

Analysis Description: 7470 Mercury TCLP

Associated Lab Samples: 9249422001, 9249422002

METHOD BLANK: 314757

Matrix: Water

Associated Lab Samples: 9249422001, 9249422002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	ug/L	ND	0.20	07/29/09 13:42	

LABORATORY CONTROL SAMPLE: 314758

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	2.5	2.6	103	80-120	

MATRIX SPIKE SAMPLE: 314759

Parameter	Units	9248008001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	ND	2.5	2.8	110	75-125	

SAMPLE DUPLICATE: 314760

Parameter	Units	9249422001 Result	Dup Result	RPD	Max RPD	Qualifiers
Mercury	ug/L	0.13J	0.11J		20	

QUALITY CONTROL DATA

Project: Flint Ink
Pace Project No.: 9249422

QC Batch: MPRP/4828 Analysis Method: EPA 6010
QC Batch Method: EPA 3010 Analysis Description: 6010 MET TCLP
Associated Lab Samples: 9249422001, 9249422002

METHOD BLANK: 315013 Matrix: Water

Associated Lab Samples: 9249422001, 9249422002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Arsenic	mg/L	ND	0.025	07/31/09 00:08	
Barium	mg/L	0.017J	0.025	07/31/09 00:08	
Cadmium	mg/L	ND	0.0050	07/31/09 00:08	
Chromium	mg/L	0.0044J	0.025	07/31/09 00:08	
Lead	mg/L	ND	0.025	07/31/09 00:08	
Selenium	mg/L	ND	0.050	07/31/09 00:08	
Silver	mg/L	0.0017J	0.025	07/31/09 00:08	

LABORATORY CONTROL SAMPLE: 315014

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/L	2.5	2.7	109	80-120	
Barium	mg/L	2.5	2.2	90	80-120	
Cadmium	mg/L	2.5	2.5	102	80-120	
Chromium	mg/L	2.5	2.6	104	80-120	
Lead	mg/L	2.5	2.4	94	80-120	
Selenium	mg/L	2.5	2.8	111	80-120	
Silver	mg/L	1.2	1.3	103	80-120	

MATRIX SPIKE SAMPLE: 315015

Parameter	Units	9249422001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/L	ND	2.5	2.7	109	75-125	
Barium	mg/L	2.6	2.5	4.8	88	75-125	
Cadmium	mg/L	ND	2.5	2.5	101	75-125	
Chromium	mg/L	0.70	2.5	3.3	103	75-125	
Lead	mg/L	14.4	2.5	16.3	76	75-125	
Selenium	mg/L	0.023J	2.5	2.8	112	75-125	
Silver	mg/L	0.0036J	1.2	1.3	103	75-125	

SAMPLE DUPLICATE: 315016

Parameter	Units	9249422002 Result	Dup Result	RPD	Max RPD	Qualifiers
Arsenic	mg/L	ND	ND		20	
Barium	mg/L	2.3	2.4	4	20	
Cadmium	mg/L	ND	ND		20	
Chromium	mg/L	1.4	1.5	4	20	
Lead	mg/L	15.3	15.9	4	20	

QUALITY CONTROL DATA

Project: Flint Ink
Pace Project No.: 9249422

SAMPLE DUPLICATE: 315016

Parameter	Units	9249422002 Result	Dup Result	RPD	Max RPD	Qualifiers
Selenium	mg/L	ND	ND		20	
Silver	mg/L	0.0013J	0.0011J		20	

QUALIFIERS

Project: Flint Ink
Pace Project No.: 9249422

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content.

ND - Not Detected at or above adjusted reporting limit.

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

Pace Analytical is NELAP accredited. Contact your Pace PM for the current list of accredited analytes.

U - Indicates the compound was analyzed for, but not detected.

LABORATORIES

PASI-A Pace Analytical Services - Asheville

PASI-C Pace Analytical Services - Charlotte

ANALYTE QUALIFIERS

Z2 Analyte present in the associated method blank above the detection limit.

QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Flint Ink
Pace Project No.: 9249422

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
9249422001	Roll-off 1	ASTM D2974-87	PMST/2609		
9249422002	Roll-off 2	ASTM D2974-87	PMST/2609		
9249422003	E-12	ASTM D2974-87	PMST/2609		
9249422004	E-11	ASTM D2974-87	PMST/2609		
9249422003	E-12	EPA 3546	OEXT/7509	EPA 8270	MSSV/2937
9249422004	E-11	EPA 3546	OEXT/7509	EPA 8270	MSSV/2937
9249422001	Roll-off 1	EPA 3510	OEXT/7523	EPA 8270	MSSV/2931
9249422002	Roll-off 2	EPA 3510	OEXT/7523	EPA 8270	MSSV/2931
9249422001	Roll-off 1	EPA 7470	MERP/2297	EPA 7470	MERC/2285
9249422002	Roll-off 2	EPA 7470	MERP/2297	EPA 7470	MERC/2285
9249422001	Roll-off 1	EPA 3010	MPRP/4828	EPA 6010	ICP/4471
9249422002	Roll-off 2	EPA 3010	MPRP/4828	EPA 6010	ICP/4471

CHAIN-OF-CUSTODY / Analytical Request Document
The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

1324956

Section A Required Client Information: Company: NRS Corporation Address: 6135 Park South Dr Email To: Charlotte, NC Phone: Kevin Arnold@nrs.com Requested Due Date/TAT: RUSH		Section B Required Project Information: Report To: Ken Arnold Copy To: Purchase Order No.: Project Name: First Link Project Number: 13649889		Section C Invoice Information: Attention: Ken Arnold Company Name: NRS Corp. Address: 11 Pace Quote Reference: Pace Project Manager: Pace Profile #:		REGULATORY AGENCY NPDES <input type="checkbox"/> GROUND WATER <input type="checkbox"/> DRINKING WATER <input type="checkbox"/> UST <input checked="" type="checkbox"/> RORA <input type="checkbox"/> OTHER <input type="checkbox"/> Site Location STATE: 916-32	
--	--	--	--	---	--	--	--

ITEM #	Section D Required Client Information SAMPLE ID (A-Z, 0-9 / -) Sample IDs MUST BE UNIQUE	Matrix Codes MATRIX / CODE Drinking Water DW Water WT Waste Water WW Product P Soil/Solid SL Oil OL Wipe WP Air AR Tissue TS Other OT	MATRIX CODE (see valid codes to left)	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED		SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives							Analysis Test ↓	Requested Analysis Filtered (Y/N)	Residual Chlorine (Y/N)	Pace Project No./ Lab I.D.
					COMPOSITE START	COMPOSITE END/GRAB			DATE	TIME	DATE	TIME	Y	N	Y				
1	R01-off 1		SL C	C	11/10/09	1345		2	Unpreserved										001
2	R01-off 2		SL C	C	13/10	1420		2	H ₂ SO ₄										002
3	E-102		SL C	C	14/20			4	HNO ₃										003
4	E-11		SL C	C	14/20			4	HCl										004
5									NaOH										
6									Na ₂ S ₂ O ₃										
7									Methanol										
8									Other										
9																			
10																			
11																			
12																			

ADDITIONAL COMMENTS RUSH / As soon as possible		RELINQUISHED BY / AFFILIATION Ken Arnold NRS		DATE 7/24/09		TIME 1430		ACCEPTED BY / AFFILIATION Ken Arnold Pace		DATE 7/24/09		TIME 1505		SAMPLE CONDITIONS Temp in °C Received on Ice (Y/N) Custody Sealed Cooler (Y/N) Samples Intact (Y/N)	
--	--	--	--	------------------------	--	---------------------	--	---	--	------------------------	--	---------------------	--	--	--

ORIGINAL

*Important Note: By signing this form you are accepting Pace's NET 30 day payment terms and agreeing to late charges of 1.5% per month for any invoices not paid within 30 days.
F-ALL-Q-020rev.07, 15-May-2007



Sample Condition Upon Receipt

Client Name: URS Project # 9249422

Courier: Fed Ex UPS USPS Client Commercial Pace Other _____

Custody Seal on Cooler/Box Present: yes no Seals intact: yes no

Packing Material: Bubble Wrap Bubble Bags None Other _____

Thermometer Used LT060 Type of Ice: Wet Blue None Samples on ice, cooling process has begun

Cooler Temperature 4.0 Biological Tissue is Frozen: Yes No N/A

Temp should be above freezing to 6°C

Optional
Proj. Due Date: N/A
Proj. Name: N/A

Date and Initials of person examining contents: TM 7/27/09

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5.
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	6.
Rush Turn Around Time Requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	7.
Sufficient Volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	8.
Correct Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	9.
-Pace Containers Used:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.
Filtered volume received for Dissolved tests	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	11.
Sample Labels match COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	12.
-Includes date/time/ID/Analysis Matrix: <u>DL</u>		
All containers needing preservation have been checked.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	13.
All containers needing preservation are found to be in compliance with EPA recommendation.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
exceptions: VOA, coliform, TOC, O&G, WI-DRO (water)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Initial when completed
Samples checked for dechlorination:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Headspace in VOA Vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	15.
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	16.
Trip Blank Custody Seals Present	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Pace Trip Blank Lot # (if purchased):	N/A	

Client Notification/ Resolution: _____ Field Data Required? Y / N / N/A

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: [Signature] Date: 7/27/09

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e out of hold, incorrect preservative, out of temp, incorrect containers)

APPENDIX B

DISPOSAL MANIFESTS

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number NCD083678631	2. Page 1 of 1	3. Emergency Response Phone 704-716-0740	4. Manifest Tracking Number 002215366 JJK
---	---	--------------------------	--	---

5. Generator's Name and Mailing Address Flint Group North America 104 National Drive, Anniston, AL 36207	Generator's Site Address (if different than mailing address) 515 South Turner Avenue Charlotte, NC 28208
--	--

6. Transporter 1 Company Name Evo Corporation	U.S. EPA ID Number NCD982114803
---	---

7. Transporter 2 Company Name U.S. Bulk Transport Inc.	U.S. EPA ID Number PAD987347515
--	---

8. Designated Facility Name and Site Address MAX Environmental Technologies, Inc. 283 Max Lane, Yulcon, PA 15698	U.S. EPA ID Number PAD004835146
--	---

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. RQ, Hazardous Waste, Solid, N.O.S., 9, NA3077, PG III (D008, Lead)	001	DT	Est 15	T	D008		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information 9b.1 Soil with Lead Contamination GJS #55766 ERB #171 Evo #070917
--

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Officer's Printed/Typed Name Kevin Arnold	Authorized Agent for Flint Group North America	Signature <i>[Signature]</i>	Month 09	Day 10	Year 09
---	--	---------------------------------	--------------------	------------------	-------------------

16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.	Port of entry/exit: Amosca
--	--------------------------------------

17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name TERRY CRAIG	Signature <i>[Signature]</i>	Month 09	Day 10	Year 09	
Transporter 2 Printed/Typed Name ERIC HARN	Signature <i>[Signature]</i>	Month 09	Day 16	Year 09	

18. Discrepancy					
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input checked="" type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
Item 11. is estimated.					
Manifest Reference Number:				Actual weight 27000 D	
				U.S. EPA ID Number	

18b. Alternate Facility (or Generator)					
Facility's Phone:					
18c. Signature of Alternate Facility (or Generator)					
Month Day Year					

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1. H U	2.	3.	4.		

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a					
Printed/Typed Name LARRY PROTECH	Signature <i>[Signature]</i>	Month 09	Day 16	Year 09	

FLYING J TRAVEL PLAZA



J-SCALE-GUARANTEED WEIGHT

09-16-2009

Weigh Fee \$9.00

TICKET NUMBER: 211A0022

WEIGHED AT:

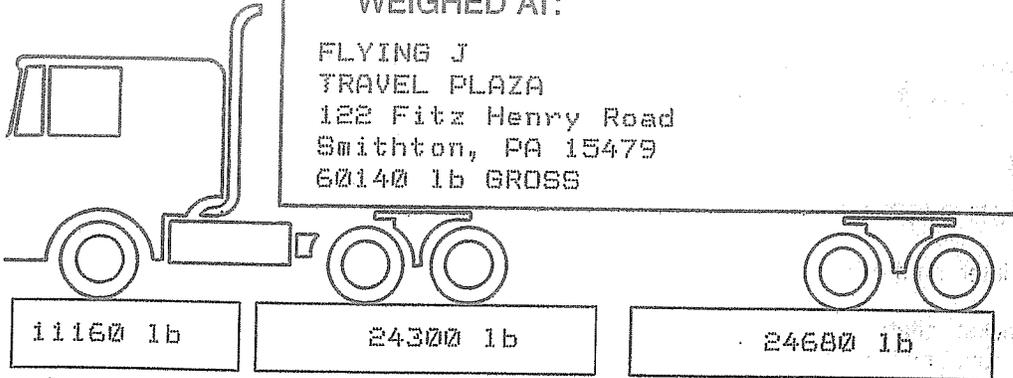
FLYING J
TRAVEL PLAZA
122 Fitz Henry Road
Smithton, PA 15479
60140 lb GROSS

GUARANTEED



J-SCALE

Our Seal Means It's
"GUARANTEED"



11160 lb

24300 lb

24680 lb

CUSTOMER NAME: US BULK

TRUCK NUMBER: 1251

TRAILER NUMBER: 1251A

COMMODITY

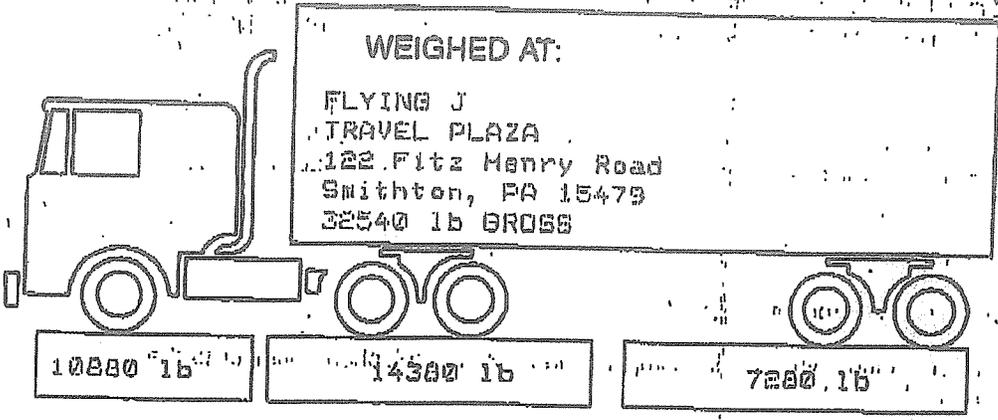
Leslie Doms
WEIGHER SIGNATURE

FLYING J TRAVEL PLAZA

 **J-SCALE-GUARANTEED WEIGHT**

09-16-2009

Weigh Fee \$1.00
TICKET NUMBER: 211A0086



Our Seal Means It's
"GUARANTEED"

CUSTOMER NAME: US BULK
TRUCK NUMBER: 1251
TRAILER NUMBER: 1251A

ERIC HARN

COMMODITY

X [Signature]

WEIGHER SIGNATURE

ATTN: Heather

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NCLCG3174631	2. Page 1 of 1	3. Emergency Response Phone 704-716-7140	4. Manifest Tracking Number 002215367 JJK		
5. Generator's Name and Mailing Address First Group North America 104 National Drive, Anniston, AL 36207 Generator's Phone: 256-535-6306				Generator's Site Address (if different than mailing address) 515 South Turner Avenue Charlotte, NC 28208			
6. Transporter 1 Company Name Evo Corporation				U.S. EPA ID Number NCLG982114808			
7. Transporter 2 Company Name U.S. Truck Transport Inc.				U.S. EPA ID Number PAB987347515			
8. Designated Facility Name and Site Address MAX Environmental Technologies, Inc. 233 Max Lane, York, PA 15678 Facility's Phone: 724-722-3606				U.S. EPA ID Number PAB004835146			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
X	1. HW, Hazardous Waste, Solid, N.O.S., NA 3077, PEST (Acid, Lead)	(1)	LT	15	1	None	
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information 1.1 Solid with Lead contamination EPA 5576 ERM 171 Evo 170717							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name Evo Corporation				Signature [Signature]		Month Day Year 09 10 09	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name Evo Corp				Signature [Signature]		Month Day Year 09 10 09	
Transporter 2 Printed/Typed Name L.A. Chilton				Signature [Signature]		Month Day Year 09 10 09	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: 002215367 P							
18b. Alternate Facility (or Generator) U.S. EPA ID Number							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. 11 111		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name L.A. Chilton				Signature [Signature]		Month Day Year 09 10 09	

FLYING J TRAVEL PLAZA

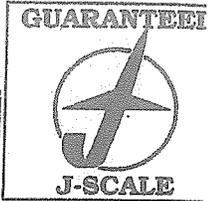
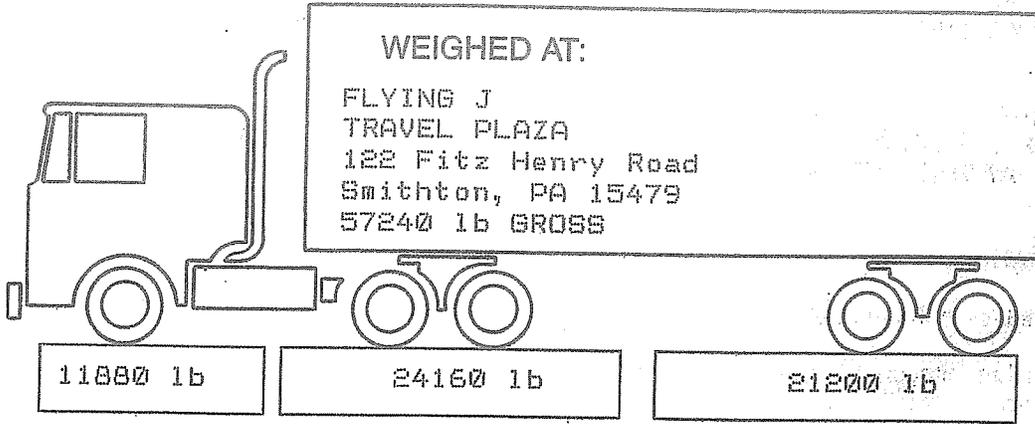


J-SCALE-GUARANTEED WEIGHT

09-16-2009

Weigh Fee \$9.00

TICKET NUMBER: 21179837



Our Seal Means
"GUARANTEED"

CUSTOMER NAME: US BULK
TRUCK NUMBER: 1288
TRAILER NUMBER: 1288A

COMMODITY

x Leslie M.S.
WEIGHER SIGNATURE

8310377

TICKET NUMBER



CERTIFIED
AUTOMATED
TRUCK
SCALE

CAT SCALES COMPANY
PO BOX 630
VAL COTT IA 52735
(563) 284-5288
www.catscales.com

1213
SCALE
891087 LOCATION
PUBLIC WEIGHT STATIONS
CERTIFICATE OF
WEIGHT & MEASURE

IMPRINT SEAL HERE
(IF APPLICABLE)

WEIGHT NUMBER
377

CUSTOMER COPY

THE CAT SCALE GUARANTEE

The CAT Scale Company guarantees that if a scale will give an erroneous weight, when made use of in accordance with the instructions, we will make good the difference between the actual and the indicated weight.

WEIGHT WRAP UP WE CAN DO IT

If you get an overweight fine from the state, call us. One of our CAT Scale Technicians will show a local trucker how to immediately check your scale and fix it. We will reimburse you for the cost of the overweight fine. If you want, or if you believe our scale was correct, a representative of CAT Scale Company will appear in court with the driver as an expert witness to believe our scale was correct.

If you should get an overweight fine, you should be following to get the problem resolved.

Post bond and request a court date.

Call CAT Scale Company direct 24 hours a day (877-CAT-SCALE (Toll Free)).

IMMEDIATELY send a copy of the citation, CAT Scale Ticket, your name, company, address, and phone number to CAT Scale Company, Attn: Guarantee Department.

The four weights shown below are accurate weights. The GROSS WEIGHT is the CERTIFIED WEIGHT and was weighed on a full length platform scale. All weights are guaranteed by CAT Scale.

STEERABLE	11340	1B
DRIVEABLE	14340	1B
TRAILER AXLE	8740	1B
GATEWAY TRAVEL PLAZA	1617	GROSS WEIGHT 1B
1-76/LEBOVEX ILL	3110	1B
BREEZEMOOD PARK	3110	1B

9-22-2009

29

This is to certify that the following described merchandise was weighed, counted, or measured by a public or deputy weighmaster and when properly signed and sealed shall be prima facie evidence of the accuracy of the weight shown as prescribed by law.

LIVESTOCK, FUR, PROPERTY, COMMODITY OR ARTICLE WEIGHED

COMPANY

WEIGH STATION

WEIGHT NUMBER

DRIVER IN TRUCK (UNLESS CHECKED HERE)

CAT SCALE
COLLECTION
CAPS
INSIDE!

TRACTOR 25A TRAILER 12888

WEIGHT NUMBER
377

65336

JEN KAPINER I-
OF REMEIRA

© 1999 CAT Scale Company, Inc.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NCDD93578531	2. Page 1 of	3. Emergency Response Phone 704-333-9063	4. Manifest Tracking Number 009268792 JJK			
5. Generator's Name and Mailing Address FLINT 515 S. TURNER AVENUE CHARLOTTE, NC 28202 Generator's Phone: 704-333-9063			Generator's Site Address (if different than mailing address)					
6. Transporter 1 Company Name STAT INC			U.S. EPA ID Number NC07980799042					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address ENWRITE (OH) 2050 CENTRAL AVE SE. CANTON, OH 44707 Facility's Phone: 330-456-6238			U.S. EPA ID Number OHD90566392					
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
x	1. NA3077, RQ, HAZARDOUS WASTE SOLID, N.O.S., (LEAD CONTAMINATED SOIL), 9, PGIII, ERG-171 #121100EDOH	001	CM	257	E	D008		
	2.							
	3.							
	4.							
14. Special Handling Instructions and Additional Information NEEDS CD SENT TO US WASTE 24 HR EMERGENCY CONTACT STEVE RISCH 704-596-9767 CC103057								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offeror's Printed/Typed Name ON BEHALF FLINT COMPANY / JENNIFER W HEART				Signature <i>Jennifer W Heart</i>		Month Day Year 10/16/12		
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. URS CORP. Port of entry/exit: Smith's Swanwick URS								
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: JAMES R RABLO Signature: <i>James R Rablo</i> Month Day Year: 10/16/12 Transporter 2 Printed/Typed Name: _____ Signature: _____ Month Day Year: _____								
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____								
18b. Alternate Facility (or Generator) U.S. EPA ID Number: _____ Facility's Phone: _____								
18c. Signature of Alternate Facility (or Generator) Month Day Year: 10/17/12								
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. H111		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name: RICCO SANDERS Signature: <i>Ricco Sanders</i> Month Day Year: 11/01/12								

ENVIRITE OF OHIO, INC.
CANTON, OHIO 44707

WEIGHT TALLY

NUMBER _____

REMARKS: _____

FLINT

1121100E0H

STAT

38920 10 07:37 am 10/17/12

26240 10 Gross

07:38 am 10/17/12

66,160 # Gross
52,380 # TIC

LPU

SPU

31120 10 Gross

08:04 am 10/17/12

13,780 # net

21260 10 Gross

08:04 am 10/17/12

ENVIRITE OF OHIO, INC., WEIGHER

APPENDIX C
PHOTOGRAPHIC LOG

Client Name:
Flint Group US LLC

Site Location:
515 South Turner Avenue, Charlotte, NC

Project No.
13651432

Photo No.
1

Date:
7/1/09

Direction Photo Taken:
South

Description:
Photo taken prior to excavation activities.



Photo No.
2

Date:
7/21/09

Direction Photo Taken:
West

Description:
Excavation area of Former Drainage Ditch B and excavated soils on plastic.



Client Name:
Flint Group US LLC

Site Location:
515 South Turner Avenue, Charlotte, NC

Project No.
13651432

Photo No.
3

Date:
7/21/09

Direction Photo Taken:
Northwest

Description:
Soil pile adjacent to Former Drainage Ditch B excavation.



Photo No.
4

Date:
7/21/09

Direction Photo Taken:
South

Description:
Excavation area of Former Drainage Ditch B.



Client Name:

Flint Group US LLC

Site Location:

515 South Turner Avenue, Charlotte, NC

Project No.

13651432

Photo No.

5

Date:

7/24/09

Direction Photo

Taken:

West

Description:

Roll-off containing impacted soils from Former Drainage Ditch B.



Photo No.

6

Date:

7/24/09

Direction Photo

Taken:

West.

Description:

Interior of lined roll-off containing soils from Former Drainage Ditch B.



Client Name: Flint Ink		Site Location: 515 South Turner Avenue, Charlotte, NC	Project No.: 13651432
Photo No.: 7	Date: 6/27/12		
Direction Photo Taken: Southwest			
Description: Geotextile fabric separating impacted soils from clean fill at Former Drainage Ditch B.			

Photo No.: 8	Date: 6/27/12	
Direction Photo Taken: North		
Description: Clean fill placed within Former Drainage Ditch B area.		

Client Name: Flint Group US LLC		Site Location: 515 South Turner Avenue, Charlotte, NC	Project No.: 13651432
Photo No.: 9	Date: 6/27/12		
Direction Photo Taken: North			
Description: Spreading and compacting clean fill within Former Drainage Ditch B area			

Photo No.: 10	Date: 6/27/12	
Direction Photo Taken: Southeast		
Description: Completed compaction of clean fill at Former Drainage Ditch B.		

Client Name: Flint Group US LLC		Site Location: 515 South Turner Avenue, Charlotte, NC	Project No.: 13651432
Photo No. 11	Date: 9/26/12		
Direction Photo Taken: North			
Description: Marked utilities prior to excavating soil sample D-24.			

Photo No. 12	Date: 9/26/12	
Direction Photo Taken: North		
Description: Excavating impacted soils at soil boring location D-24.		

Client Name: Flint Group US LLC		Site Location: 515 South Turner Avenue, Charlotte, NC	Project No.: 13651432
Photo No.: 13	Date: 9/26/12		
Direction Photo Taken: South			
Description: Completed excavation activities at soil boring location D-24. Clean fill compacted via excavating equipment.			

Photo No.: 14	Date: 1/16/16		
Direction Photo Taken: Southwest			
Description: Site visit performed on January 16, 2016. Property owner has made improvements to windows on east side of building.			

Client Name:

Flint Group US LLC

Site Location:

515 South Turner Avenue, Charlotte, NC

Project No.

13651432

Photo No.**15****Date:**

1/16/16

Direction Photo**Taken:**

North

Description:

Site visit performed on January 16, 2016. 55 gallon drum was removed on February 3, 2016.



APPENDIX D

ELECTRONIC CORRESPONDENCE CONCURRENCE from NCDEQ

Arnold, Kevin

From: Thomas, Dianne <dianne.thomas@ncdenr.gov>
Sent: Friday, February 26, 2016 7:38 AM
To: MacWilliams, Rob
Cc: Arnold, Kevin
Subject: RE: Flint Soil Remedial Action Containment Notification

Rob-

The Inactive Hazardous Sites Branch (Branch) is in receipt of the Containment Remedy Notification letter for areas A and B of the roughly 1.8 acre site (the Site) referenced above. This document was dated and was received via email on June 19, 2015. Based on this submittal, and our subsequent discussions, the Branch concurs with the proposed containment remedy provided that the land-use restrictions are agreed upon and the two documents described below are properly recorded following the RAP Addendum public notice period. Be aware that, when the Branch provides concurrence as required by 15A NCAC 13C .0306(i)(2) for an on-site containment remedy that is part of a Remedial Action Plan (RAP), the Branch does not review and approve the entire RAP and all data associated with the Site. Compliance with the REC rules, including completion of all portions of the RAP, and all other applicable laws from other agencies is the responsibility of the RSM.

For a proposed containment remedy, two documents will ultimately be recorded at the Register of Deeds: a Notice of Inactive Hazardous Substance or Waste Disposal Site (Notice) and a Declaration of Perpetual Land Use Restrictions (DPLUR) document. Instructions for the Notice can be found under 'Guidance' on the Branch website, http://portal.ncdenr.org/c/document_library/get_file?uuid=4107ab0f-23a7-45af-827a-d5fb3f255765&groupId=38361. You already have a copy of the agreed upon restrictions for the DPLUR document and once the draft Notice is revised as discussed via telephone February 23, draft versions of each document should be included as an appendix of the proposed RAP Addendum for public notice. These two documents can be finalized while the proposed RAP Addendum is undergoing public notice. Additional details regarding the procedures for completing and implementing a RAP for a containment remedy can be found in Appendix F.7 of the REC Program Implementation Guidance.

If you have any questions please feel free to contact me.

Dianne Thomas

Dianne Thomas

Inactive Hazardous Sites Branch – Registered Environmental Consultant Program
North Carolina Department of Environmental Quality

919 707-8348 office
dianne.thomas@ncdenr.gov

217 West Jones Street
1601 Mail Service Center
Raleigh, NC 27699



Nothing Compares

Email correspondence to and from this address is subject to the

APPENDIX E

DECLARATION OF PERPETUAL LAND USE RESTRICTIONS

DECLARATION OF PERPETUAL LAND USE RESTRICTIONS

For Property Owned By: Carolina Urban Properties, LTD

The real property which is the subject of this Declaration of Perpetual Land Use Restrictions ("Declaration") is contaminated with hazardous substances, and is an INACTIVE HAZARDOUS SUBSTANCE OR WASTE DISPOSAL SITE ("the Site") as defined by North Carolina's Inactive Hazardous Sites Response Act of 1987, which consists of Section 130A-310 through Section 130A-310.19 of the North Carolina General Statutes ("N.C.G.S"). This Declaration is part of a Remedial Action Plan for the Site that has been approved by the Secretary of the North Carolina Department of Environmental Quality, Division of Waste Management, Superfund Section (or its successor in function), or his/her delegate, as authorized by N.C.G.S. Section 130A-310.3(f). The North Carolina Department of Environmental Quality shall hereinafter be referred to as "DEQ." Hereafter, the Division of Waste Management, Superfund Section shall be referred to as "Superfund Section".

Carolina Urban Properties, LTD, is the owner in fee simple of the Property ("the Property"), which is located at 515 S. Turner Avenue in the County of Mecklenburg, City of Charlotte, State of North Carolina, and is the real property legally described in Deed Book 22856, Page 121 in the Office of the Register of Deeds for Mecklenburg County. The Property is also shown on a Notice of Inactive Hazardous Substance or Waste Disposal Site, in the form of a survey plat ("Survey Plat"), which has been recorded prior to the recordation of this Declaration in Map Book ____ Page ____ in the Office of the Register of Deeds for Mecklenburg County. A copy of the Survey Plat is included as Exhibit A to this Declaration.

For the purpose of protecting public health and the environment, Carolina Urban Properties, LTD hereby declares that all of the Property shall be held, sold and conveyed subject to the following perpetual land use restrictions, which shall run with the land; shall be binding on all parties having any right, title or interest in the Property or any part thereof, their heirs, successors and assigns; and shall, as provided in N.C.G.S. Section 130A-310.3(f), be enforceable without regard to lack of privity of estate or contract, lack of benefit to particular land, or lack of any property interest in particular land. These restrictions shall continue in perpetuity and cannot be amended or canceled unless and until the Mecklenburg County Register of Deeds receives and records the written concurrence of the Secretary of DEQ (or its successor in function), or his/her delegate. If any provision of this Declaration is found to be unenforceable in any respect, the validity, legality, and enforceability of the remaining provisions shall not in any way be affected or impaired.

PERPETUAL LAND USE RESTRICTIONS

The following restrictions shall apply only to Area A of the Property:

1. No alteration or disturbance of the concrete flooring, walls, and/or underlying soil shall occur unless approved in writing in advance by the Superfund Section or its successor in function.
2. The structure, or portion thereof, currently identified as Area A, shall not be demolished without prior written approval by the Superfund Section or its successor in function.
3. The following standard maintenance activities shall be performed at Area A of the Property:
 - a. The concrete flooring shall be maintained across Area A in good condition. Cracks shall be repaired promptly upon discovery.
 - b. Signs indicating the presence of contamination and restricting disturbance of concrete shall be located at each corner and along the perimeter of Area A. The front of each sign on the outside of the building shall face away from Area A. The front of each sign on the inside of the building shall face toward Area A. Each sign shall be located at a maximum distance of 100 feet apart and in a manner such they are easily visible along the perimeter of Area A at all times. The signs shall state the following using similar font with a minimum of one-half (0.5) inch font size:

NOTICE
SUBSURFACE CONTAMINATION
Contact the Property Owner
Regarding Land Use Restrictions
Prior to Disturbing Floors, Walls, or Soil

All signage required by this instrument shall be inspected at least annually and maintained in its original condition.

The following restrictions shall apply only to Area B of Property:

1. No alteration or disturbance of the asphalt or underlying soil shall occur unless approved in writing in advance by the Superfund Section or its successor in function.
2. The following standard maintenance activities shall be performed at Area B of the Property:
 - a. Asphalt shall be maintained across Area B in good condition. Cracks shall be repaired promptly upon discovery.
 - b. Bollards on the corner of the building and on the fence line on the northern portion of Area B shall be installed and maintained in the specific location depicted on the

Notice.

- c. All fencing shall be inspected at least annually and maintained in the specific location depicted on the Notice, in its original condition and in a manner that secures Area B. Signs indicating the presence of contamination and restricting disturbance of asphalt shall be located along the perimeter of Area B. The front of each sign on the outside of the building shall face toward from Area B. Each sign shall be located at a maximum distance of 100 feet apart and in a manner such they are easily visible along the perimeter of Area B at all times. The signs shall state the following using similar font with a minimum of one-half (0.5) inch font size:

NOTICE
SUBSURFACE CONTAMINATION
Contact the Property Owner
Regarding Land Use Restrictions
Prior to Disturbing Asphalt

All signage required by this instrument shall be inspected at least annually and maintained in its original condition.

The following restrictions shall apply to both Area A and Area B of Property:

1. No surface or subsurface native or fill earthen materials may be removed from the Property without prior written approval by the Superfund Section or its successor in function.
2. Each person who owns any portion of the Property shall submit a letter report, containing the notarized signature of the owner, in January of each year on or before January 31st, to the Superfund Section, or its successor in function, confirming that this Declaration is still recorded in the Office of the Mecklenburg County Register of Deeds, that activities and conditions at the Property remain in compliance with the land use restrictions herein, and that the Property has not been subdivided since the last letter report submitted to the Superfund Section.
3. No person conducting environmental assessment or remediation at the Site, or involved in determining compliance with applicable land use restrictions at the Property, at the direction of, or pursuant to a permit or order issued by the Superfund Section or its successor in function may be denied access to the Property for the purpose of conducting such activities.
4. Each person who owns any portion of the Property shall cause the instrument of any sale, lease, grant, or other transfer of any interest in the Property to include a provision expressly requiring the lessee, grantee, or transferee to comply with this Declaration. The failure to include such provision shall not affect the validity or applicability of any land use restriction

in this Declaration.

REPRESENTATIONS AND WARRANTIES

The owner of the Property hereby represents and warrants to the other signatories hereto:

that the owner of the Property is the sole owner of the Property;

that the owner of the Property holds fee simple title to the Property free, clear, and unencumbered, excepting financial encumbrances;

that the owner of the Property has the power and authority to enter into this Declaration, to grant the rights and interests herein provided and to carry out all obligations hereunder;

that the owner of the Property has provided to the Superfund Section the names of all other persons that own an interest in or hold an encumbrance on the Property and has notified such persons of the owner's intention to enter into this Declaration; and

that this Declaration will not materially violate or contravene or constitute a material default under any other agreement, document or instrument to which the owner of the Property is a party or by which the owner of the Property may be bound or affected.

ENFORCEMENT

The above land use restrictions are an integral part of the remedy for the contamination at the Site. Adherence to the restrictions is necessary to protect public health and the environment. These land use restrictions shall be enforced by any owner, operator, or other party responsible for any part of the Site. The above land use restrictions may also be enforced by the Superfund Section through the remedies provided in N.C.G.S. Chapter 130A, Article 1, Part 2 or by means of a civil action, and may also be enforced by any unit of local government having jurisdiction over any part of the Site. Any attempt to cancel this Declaration without the approval of the Superfund Section or its successor in function shall constitute noncompliance with the Remedial Action Plan approved by the Superfund Section for the Site, and shall be subject to enforcement by the Superfund Section to the full extent of the law. Failure by any party required or authorized to enforce any of the above restrictions shall in no event be deemed a waiver of the right to do so thereafter as to the same violation or as to one occurring prior or subsequent thereto.

FUTURE SALES, LEASES, CONVEYANCES AND TRANSFERS

When any portion of the Property is sold, leased, conveyed or transferred, pursuant to N.C.G.S. Section 130A-310.8(e) the deed or other instrument of transfer shall contain in the

description section, in no smaller type than that used in the body of the deed or instrument, a statement that the real property being sold, leased, conveyed, or transferred has been used as a hazardous substance or waste disposal site and a reference by book and page to the recordation of the Notice of Inactive Hazardous Substance or Waste Disposal Site referenced in this Declaration.

OWNER SIGNATURE

IN WITNESS WHEREOF, I, exercising power of attorney for Carolina Urban Properties, LTD execute these presents on this ___ day of _____, 20__.

Signatory's name typed or printed: _____

Signatory's title typed or printed: _____

STATE OF NORTH CAROLINA
COUNTY OF _____

I, _____, a Notary Public, do hereby certify that _____ personally appeared before me this day, produced proper identification in the form of _____, and declared that he is the President of Carolina Urban Properties, LTD and that by authority duly given, and as the act of Carolina Urban Properties, LTD he has signed this Declaration.

WITNESS my hand and official seal this ___ day of _____, 20__.

Notary Public

My Commission expires: _____

[SEAL]

APPROVAL AND CERTIFICATION OF THE NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

The foregoing Declaration of Perpetual Land Use Restrictions is hereby approved and certified.

By: _____

Jim Bateson, Chief
Superfund Section
Division of Waste Management
North Carolina Department of Environment and
Natural Resources

STATE OF NORTH CAROLINA
COUNTY OF _____

I, _____, a Notary Public, do hereby certify that
_____ personally appeared before me this day,
produced proper identification in the form of _____, and signed this
Declaration.

WITNESS my hand and official seal this ____ day of _____, 20____.

Notary Public

My Commission expires: _____

[SEAL]

REGISTER OF DEEDS CERTIFICATION

The foregoing Declaration of Perpetual Land Use Restrictions is certified to be duly recorded at the date and time, and the Book and Page, shown on the first page hereof.

Register of Deeds for Mecklenburg County

By: _____

Signature

Type or print name and title

APPENDIX F
NOTICE OF AN INACTIVE HAZARDOUS WASTE OR WASTE DISPOSAL SITE

