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August 31, 2016

Mr. David Kwiatkowski
North Carolina Department of
Environmental Quality
Pre-Regulatory Landfill Unit
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Subject: Work Plan for Task Order 673DP-3
Bud Holding Company
10 & 12 Sharps Airpark Court
Greensboro, Guilford County
ID # NONCD0000673

Dear Mr. Kwiatkowski:

CDM Smith Inc. is pleased to submit this Work Plan and schedule for Task Order 673DP-3 dated August 18, 2016. Per Task Order 673DP-3, CDM Smith will obtain a Notification of Jurisdictional Determination by the US Army Corps of Engineers (USACE) at the above referenced site. A letter report summarizing the results will be provided. CDM Smith will evaluate the site under a separate Task Order.

We look forward to working with you on this project and others. If you have any questions or comments, please do not hesitate to contact me by phone at (919) 325-3569 or by email to colonemf@cdmsmith.com.

Sincerely,

A handwritten signature in black ink that reads "Mathew F. Colone".

Mathew F. Colone, P.G.
CDM Smith Inc.

cc: Daniel Forbes, CDM Smith
Rob Hopper, CDM Smith



Section 1

Task Order 673DP-3 - Background

1.1 General

CDM Smith Inc. (CDM Smith) is pleased to submit this Work Plan for Task Order 673DP-3 dated August 18, 2016. Per Task Order 673DP-3, CDM Smith will perform the necessary activities to obtain a Notification of Jurisdictional Determination by the U.S. Army Corps of Engineers (USACE) for the Bud Holding Company – 10 & 12 Sharps Airpark Court site located in Greensboro, Guilford County, North Carolina.

A report summarizing the results will also be completed. All field activities will be performed in accordance with the Work Plan approved by the North Carolina Department of Environmental Quality's Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch (IHSB) - Pre-Regulatory Landfill Unit (Unit). Work Plan details and a schedule are provided in Section 2 and Section 3 summarizes the reporting.

1.2 Personnel

CDM Smith and subcontractor personnel engaged in intrusive field activities at the site will comply with Occupational Safety and Health Administration required health and safety training for hazardous waste sites.

1.3 Recordkeeping and Progress Updates

Records will be kept in a site dedicated logbook to track the progress of field activities. CDM Smith's Project Task Manager and the Unit's Project Manager (PM) will be notified if field conditions or findings require a deviation from the Work Plan. If there are delays due to weather or other unforeseen events, the Unit's PM will be contacted and a written request for extension will be submitted.

CDM Smith will provide a daily email to the Unit's PM summarizing field activities. Conditions or findings that may cause cost overruns will be communicated immediately to the Unit's PM and work will cease until approval is granted. Unit approved cost overruns will be followed by written correspondence from CDM Smith within 24-hours of verbal approval. The daily field notes and updates along with other means may be used by CDM Smith for invoicing, subcontractor invoice verification, cost overrun justification and billing to the Unit. As such, the logbook will include among other things:

- Travel time between the site and the CDM Smith office located in Raleigh, North Carolina;
- Date and time spent on-site along with a summary of work performed each day;
- General weather conditions;
- Site visitors;
- All field parameters collected;
- Observations that may affect the scope of work or schedule; and
- Identification of photographs taken prior to beginning a task and at completion.

Section 2

Task Order 673DP-3 - Work Plan

CDM Smith will conduct a jurisdictional area evaluation and delineation as discussed in the Work Plan for Task Order 673FP. Following the evaluation at the site, CDM Smith will obtain a Notification of Jurisdictional Determination from the USACE for the delineation.

2.1 Obtain Jurisdictional Determination by Corps

CDM Smith will solicit field confirmation of the delineation from the USACE. North Carolina Division of Water Resources (NCDWR) will be notified and invited to attend this confirmation session. CDM Smith will make any modifications to the jurisdictional delineation deemed necessary by the USACE including reflagging boundaries and additional documentation. CDM Smith will submit the information required to obtain a Notification of Jurisdictional Determination with the USACE and follow-up with the agency until it is provided.

2.2 Schedule

CDM Smith will schedule the field confirmation of the wetland delineation within 3-weeks of receiving the Notice to Proceed from the Unit. The schedule may be adjusted to allow time for the Unit to negotiate access with the property owner. CDM Smith will confirm the date of the field confirmation of the wetland delineation with the Unit PM prior to mobilizing.

A proposed schedule and personnel involved with each task is provided below in **Table 1**.

Table 1 – Proposed Task Schedule

Task	Schedule	Personnel On-site			
		Project	Staff	Technician	Subcontractor(s)
Field Meeting with USACE and NCDWR	Day 1 – Meet with USACE and NCDWR to field confirm wetland delineation.	1	1	0	No

Section 3

Task Order 673DP-3 - Report Compilation

A draft report summarizing the results will be prepared following receipt of the Notification of Jurisdictional Determination from the USACE. The draft report will be titled *Wetland Delineation/Jurisdictional Determination* and will include a discussion of the wetland delineation, USACE Approved Jurisdictional Determination Form and supporting information, site map with wetland points, a copy of the field notes, and certification form.

The draft report will be submitted electronically to the Unit for approval within 14 days of receipt of the Notification of Jurisdictional Determination. A final copy of the report will be submitted electronically once any comments from the Unit on the draft report have been addressed, assumed to be within 5 days of receiving comments.