



PAT MCCRORY
Governor

DONALD R. VAN DER VAART
Secretary

MICHAEL SCOTT
Director

September 6, 2016

Thomas Roberts
Manager
Trex Properties, LLC
1650 Des Peres Road, Suite 306
St. Louis, Missouri 63131

Re: Conditional Approval of Conceptual Approach to Remediation (CAR)
Trex Properties, LLC
EPA ID # NCD 049 773 245

Dear Mr. Roberts:

A review of your Conceptual Approach to Remediation (CAR) has been completed with the exception of the cost estimate which requires additional review. The CAR is conditionally approved with the following comments/changes:

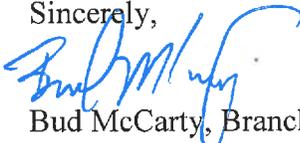
1. The Hazardous Waste Section (HWS) does not agree that the contamination is limited to properties located at 3114 and 3124 Cullman Avenue (facility) and properties down gradient (north) from the facility. Trex will be required to carry out the groundwater injection at wells NX-1 through NX-9 as shown on Figure 4. In addition, Trex will be required to expand the remedial action to include treating contaminated soils at 3110 (Leather Trimmings), 3144 (Nexus Church), 3154 Cullman Avenue. Trex will also be required to expand the treatment of groundwater contamination westward to 3110 Cullman Avenue, eastward to 3162 Cullman Avenue and northward from these properties to Little Sugar Creek.
2. Remedial action should also include additional mediation actions to address the indoor air issues at Nexus Church, Leather Trimmings, and both Trex buildings which addresses current and future uses of these properties.
3. Trex has not proven that the proposed corrective actions for Cullman Avenue will reach a point where a risk assessment can be considered within ten (10) years. Therefore, the costs for groundwater monitoring for a minimum of thirty (30) years must be included in the cost estimate. Note that a full review of the cost has not been completed as of this time. Comments on the cost estimate will be provided as soon as possible.
4. A schedule for the implementation of the proposed corrective action should have been included with the revised CAR. Trex must submit a implementation schedule by October 1, 2016.

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Trex will begin the implementation of the CAR immediately. In addition, Trex will submit weekly reports on the progress of the corrective action implementation starting September 9, 2016.

If you have any questions, please contact Kathy Lawson at (919) 707-8214 or kathleen.lawson@ncdenr.gov.

Sincerely,



Bud McCarty, Branch Head
Division of Waste Management, NC DEQ

ec: Brent Burch
Sean Morris
Mark Burnette
Jenny Lopp
David Craig, Trex

Thomas Pike, ELT
Bud McCarty
Kathleen Z. Lawson
Mailing List