



PAT MCCRORY
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October 3, 2016

Sent via Email

Mr. William Mateikis
Senior Vice President-Legal
Daikin Applied Americas, Inc.
13600 Industrial Park Blvd
Minneapolis, Minnesota 55441

Mr. Paul Heim
Senior Vice President-Legal
Daikin Applied Americas, Inc.
13600 Industrial Park Blvd
Minneapolis, Minnesota 55441

RE: DEQ Comments on *Report of Findings On-and Off-Site Vapor Testing Results*
Former Heatcraft Remediation Site
Wilmington, North Carolina
EPA Id Number: NCD 057 451 270

Mr. Mateikis and Mr. Heim:

The Hazardous Waste Section (Section) has reviewed the above referenced report. This report was submitted on your behalf by Mr. Ray Roblin of CORR Environmental Resources, Inc., in an email dated September 15, 2016.

This report presents the following results:

- Soil gas results for samples collected in the downgradient, offsite, residential neighborhood;
- Soil gas results for samples collected on the exterior of the onsite warehouse; and
- Soil gas results for samples collected from beneath the onsite warehouse slab floor.

The report also details interim corrective measures to mitigate elevated levels of trichloroethylene (TCE), previously measured in indoor air in the onsite warehouse. Specifically, the report details installation of three sub-slab depressurization points on the interior of the warehouse. Although the sub-slab depressurization points have been installed and are currently operational, confirmatory testing has not yet been conducted to evaluate the effectiveness of this latest interim corrective measure. The Report of Findings indicates that confirmatory testing will be scheduled in late Fall or early Winter when warehouse bay doors are commonly closed during business hours.

This latest round of testing confirms the presence of elevated vapor concentrations beneath the floor of the warehouse. These vapors impact indoor air quality at levels exceeding Division of Waste Management established inhalation exposure action levels for TCE.

Mitigation measures were implemented in April 2016 to enhance circulation of fresh air in the warehouse and enclosed office and breakroom spaces as a means to address the elevated indoor air levels. However, indoor air confirmatory sampling conducted on June 5, 2016, indicated that the enhanced circulation did not improve indoor air quality. The three sub-slab depressurization points were installed as part of continuing efforts to address the ongoing issue of vapor intrusion and potentially harmful air indoor quality.

The Section requires that confirmatory indoor air testing be scheduled immediately. Although work plans are typically required prior to testing, Daikin Applied Americas may conduct the next round of indoor air testing in accordance with the previously-approved *Confirmation Indoor Air Quality Testing Plan* (dated May 20, 2016). Should the next round of indoor air samples exceed the Division of Waste Management

established inhalation exposure action levels for TCE, the Section will require immediate and aggressive corrective action.

If you have any questions or comments, please do not hesitate to contact me at 919-707-8208.

Sincerely,

Mary Siedlecki

Mary Siedlecki, Project Manager
Department of Environmental Quality
Hazardous Waste Section

cc: Mr. Paul Heim, Daikin Applied Americas, Inc.
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