

327SERBSF10,617

327SERBSF10,617

Site Name (Subject): SOUTHERN WOOD PIEDMONT COMPANY

Site ID (Document ID): NCD053488557

Document Name (DocType): Correspondence (C)

Report Segment:

Description: General Correspondence, 1980 - 1998

Date of Document: 10/29/1998

Date Received:

Box: *Enter SF and # with no spaces* SF10,617

Access Level: PUBLIC

Division: WASTE MANAGEMENT

Section: SUPERFUND

Program (Document Group): SERB (SERB)

Document Category: FACILITY

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SOUTHERN WOOD PIEDMONT CO.

NCD 053 488 557

Folders

1. General Correspondence

Bound Reports

1. Photos and Maps
2. Hazardous Waste Investigation: March 1984
3. Site Inspection Prioritization: March 1994
4. Remedial Investigation Report, Volume I—Text: October 1994
5. Remedial Investigation Report, Volume II—Appendices A, B, and C: October 1994
6. Remedial Investigation Report, Volume I—Appendix D: October 1994
7. Expanded Site Investigation: October 1997
8. Revised Expanded Site Investigation, Volume I—Text: June 1999
9. Revised Expanded Site Investigation, Volume II—References: June 1999
10. Revised Expanded Site Investigation, Volume III—Appendices A and B: June 1999

Three-Ring Binders

1. Draft Remedial Investigation Work Plan—Volume I: March 1995
2. Draft Remedial Investigation Work Plan—Volume II: March 1995
2. Remedial Investigation Workplan: October 1995



U.S. Environmental Protection Agency
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<u>OU</u>	<u>Action Name</u>	<u>Qualifier</u>	<u>Lead</u>	<u>Actual Start</u>	<u>Actual Completion</u>
00	DISCOVERY		F		06/01/1981
00	SITE INSPECTION	H	F		08/01/1984
00	PRELIMINARY ASSESSMENT	L	S		08/01/1984
00	EXPANDED SITE INSPECTION	G	S		06/17/1999

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SOUTHERN WOOD PIEDMONT CO

Site Information

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Site Name: SOUTHERN WOOD PIEDMONT CO

Street: 2139 ST RD

City / State / ZIP: GULF, NC 27256

NPL Status: Not on the NPL

Non-NPL Status:

EPA ID: NCD053488557

EPA Region: 04

County: CHATHAM

Federal Facility Flag: Not a Federal Facility

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SOUTHERN WOOD PIEDMONT CO

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SOUTHERN WOOD PIEDMONT CO

Contacts

[Site Info](#) | [Aliases](#) | [Operable Units](#) | [Contacts](#)
[Actions](#) | [Contaminants](#) | [Site-Specific Documents](#)

Title	Name	Phone Number
Remedial Project Manager (RPM)	JON BORNHOLM	(404) 562-8820
Remedial Project Manager (RPM)	Luis Flores	(404) 562-8807
Remedial Project Manager (RPM)	KEN LUCAS	(404) 562-8953
Remedial Project Manager (RPM)	KEN MALLARY	(404) 562-8802
Remedial Project Manager (RPM)	MICHAEL TOWNSEND	(404) 562-8813
Remedial Project Manager (RPM)	SAMANTHA URQUHART F	(404) 562-8760
Remedial Project Manager (RPM)	Phil Vorsatz	(404) 562-8789
Site Assessment Manager (SAM)	Jennifer Wendel	(404) 562-8799

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NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

October 29, 1998



JAMES B. HUNT JR.
GOVERNOR

WAYNE McDEVITT
SECRETARY

WILLIAM L. MEYER
DIRECTOR

Mr. Jimmy Collins
Environmental Health Supervisor
Chatham County Health Department
112 East Street
Post Office Box 126
Pittsboro, NC 27312

RE: ESI Sampling
Southern Wood Piedmont

Dear Mr. Collins:

David Lilley of the NC Superfund Section left a message on your voice mail today to notify you that the NC Superfund Section will conduct a site inspection of the subject site located in Chatham County, North Carolina. The inspection will be conducted on November 9, 1998 by Doug Rumford of the NC Superfund Section.

The purpose of the inspection is to determine if the site poses a hazard to public health or the environment because of releases of contaminants to soil, surface water, groundwater, or air. The inspection team will take samples on and around the site to determine if a hazardous condition exists.

You may want to have your representative meet the inspection team at the site. If so, please contact Doug Rumford at (919) 733-2801, ext. 279 and he will coordinate a meeting. If the inspection indicates the need for future study of the site, we will contact your office to advise. If you have any questions, please don't hesitate to call David Lilley or me at (919) 733-2801.

Sincerely,

Pat DeRosa, Head
Site Evaluation and Removal Branch
Superfund Section

cc: Phil Prete
Doug Holyfield
Pat Williamson
Scott Ross
Donna Keith
David Lilley

Federal
Trip Notification & Authorization

Prepared by: C. D. Rumford

Today's Date: 10/29/98

*Use Black Ink or Typewriter only-Staff to fill out first 2 blocks only.

Site Trip.

Date of Trip: 11/9/98

If trip date changed or cancelled note below:

Trip Date Changed To: _____ Cancelled: _____

NCD#: 053 488 557

Site Name: Southern Wood Piedmont

City: Gulf

County: Chatham

Reason for Trip: ESI Sampling

Name of Hotel (Overnight Trip): _____ Hotel Telephone Number: () _____

Authorized by: _____

Industrial Hygienist

Project Team Leader: G. T. Rumford

Assistants: S. F. Parker, D. Moore, D. LaMontagne

Attach To Notification Form: 1 copy each: Preliminary Assessment Form (First page only)
Submit to the Site Map
Industrial Hygienist PA Transmittal Letter

(Please list appropriate County Health Department contact person to call to advise of trip)

Environmental Supervisor or Health Director to call: Mr. Jimmy Collins Title: Env. Health Supervisor
(Note if Dr., M.P., etc.)

Telephone Number: (919) 542-8208

Notes: Health Department Official Contacted: J. Jimmy Collins's voice mail
Back Up Letter Required: Yes No

Notified Mr. Collins via voice mail
on 10-29-98 (OBL)

Note: Signed original to Data Manager



Southern Wood Piedmont Company

March 26, 1998

RECEIVED

MAR 31 1998

SUPERFUND SECTION

Mr. Bill Meyer
State of North Carolina
Dept. of Environment, Health & Natural Resources
P. O. Box 27687
Raleigh, NC 27611-7687

Subject: Future SWP Responsible Contact

Dear Bill:

I wanted to write this note to you and tell you how much I appreciate the courtesy shown to SWP in general, and me in particular, over the past thirteen to fifteen years.

As of March 31, I will be leaving SWP to return to private business. It has been a long struggle as we have searched for solutions to very difficult issues at SWP. I feel that much has been accomplished but it is now time for me to move into a new phase in my life.

Within the current framework, SWP will be restructured and two capable people who have been trusted and valued employees of SWP will now get to put into practice what they have learned over these past few years. Bill Arrants will be assuming a new title as Mgr. of Environmental Affairs/Regulatory Compliance for the following sites: Baldwin, FL; Bunnell, FL; Lake City, FL; Macon, GA; East Point, GA; Wilmington, NC and Gulf, NC. Sandra Watson will be assuming a new title as Mgr. Environmental Affairs/Data Management for the following sites: Augusta, GA; Spartanburg, SC; Chattanooga, TN and Waverly, OH. Bill and Sandra report to the General Manager, M. D. Pruett. As we all know, moving into a new area is exciting and frightening at times, but both will do a great job as we all seek to move forward.

Please know that I will always remember my time at SWP and Rayonier with fond memories, and would hope that our paths will cross in the future. Thanks again, and please allow me to congratulate Bill and Sandra as they assume their new and challenging positions.

Sincerely,

A handwritten signature in dark ink, appearing to be 'T.M. Davis', written over a horizontal line.

T. M. Davis
Manager, Environmental Affairs

CC: W. P. Arrants
M. D. Pruett
S. B. Watson
Pat DeRosa - NC DEHNR
Jack Butler - NC DEHNR

MEMORANDUM

TO: File

FROM: G.Doug Rumford 
Hydrogeologist
NC Superfund Section

DATE: 10/24/97

SUBJECT: Southern Wood Piedmont Co.
Gulf, Chatham County, NC
NCD 053 488 557
Telephone Conversation w/ Charles Goodwin

On this day, I received a phone call from Mr. Charles Goodwin (800-334-7503) of Goodwin Trucking Company, Sanford North Carolina. Mr. Goodwin inquired about the status of any future clean-up under the Superfund Program of the Southern Wood Piedmont (SWP) site because he is interested in purchasing the Sanford Grading Property which is located on the south side of SR 2139, across the street from the western property boundary of the former SWP site. I told him that an ESI report had just been submitted to the EPA and, pending approval of the NFRAP recommendation, that the clean-up would most likely be handled under the Inactive Hazardous Sites Branch's REC Program. Mr. Goodwin hired Turner Environmental of Carrboro, NC to conduct a Phase I Site Assessment of the Sanford Grading property. Turner Environmental uncovered information that indicates Southern Wood Piedmont was a former owner of the property in question and that a laboratory and a treated lumber stacking area were formerly present on the parcel. I told Mr. Goodwin that I was not aware of this and that the CERCLA file for this site did not contain any such information. Mr. Goodwin also informed me that Turner Environmental had referenced a 1987 Law Environmental report, conducted for Southern Wood Piedmont, which indicated soil on this parcel has been impacted by wood treatment wastes. Mr. Goodwin agreed to send me the Law Env. sampling data pertaining to this piece of property.

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



August 6, 1997

Mr. T.M. Davis, Manager
Environmental Affairs
Southern Wood Piedmont Company
PO Box 5447
Spartanburg, SC 29304

Subject: Expanded Site Inspection Sample Results
Southern Wood Piedmont Company--Gulf Site
Gulf, Chatham County, NC
NCD 053 488 557

Dear Mr. Davis:

Please find attached a copy of the validated laboratory results for the Expanded Site Inspection conducted by the NC Superfund Section on November 13 & 14, 1995. Due to some reporting errors, we did not receive the final results of the extractable organic analyses until April 30, 1997. Since these results were critical to the conclusions of our report, completion of the report has been delayed. We anticipate mailing the report to US EPA Region IV by September 30, 1997. As you know, EPA will make the final decision as to the need for any further federal action after receiving our report. If you have any questions, please contact me or Doug Rumford, the site project manager at (919) 733-2801, ext. 290 or ext. 279.

Sincerely,

Pat DeRosa, Head
Site Evaluation and Removal Branch
Superfund Section

attachments

cc: (w/o attachments)
Doug Rumford
Jack Butler
Charlotte Jesneck

MEMORANDUM

March 4, 1997

TO: Doug Rumford, Hydrogeologist
Site Evaluation and Removal Branch

FROM: Hanna Assefa, Environmental Toxicologist *HA*
Inactive Hazardous Sites Branch
Superfund Section

RE: Southern Wood Piedmont
Gulf, Chatham County
NCD 053 488 557

The following are the groundwater remediation goals requested for the contaminants listed in the December 27, 1997 ViroGroup Inc. letter:

Contaminant	Remediation Goal (ppb)
Aniline	12
Benzo(a)pyrene	0.0092
Benzo(b,k)fluoranthene	0.0092
Carbazole	NA
m-methylphenol(cresol)	350
p-methylphenol(cresol)	35
o-methylphenol(ortho)	350
Fluorene	280
Indeno(1,2,3-cd)pyrene	0.092
2-Methylnaphthalene	NA
2,3,4,6-Tetrachlorophenol	0.210
2,4,6-Trichlorophenol	6.1
Methyl ethyl ketone (2-Butanone)	170

North Carolina Department of Environment, Health, and
Natural Resources

William L. Meyer, Director
Solid Waste Management Division

To: Jade Butler

Date: 2/3/97

Please:

- | | |
|--|--|
| <input type="checkbox"/> Draft a reply for my signature | <input type="checkbox"/> For your information |
| <input type="checkbox"/> Take appropriate action | <input type="checkbox"/> See me about attached |
| <input type="checkbox"/> Approve | <input type="checkbox"/> Handle and report to me |
| <input type="checkbox"/> Note and return attached material to me | |

Remarks:

Church Davis Southern Wood Piedmont

- INITIATED bio remediation on disposal pits - lagoons on only site we send copy of their cleanup efforts, are not asking us to do any thing - it is a vol. effort/cleanup on their part - just wanted us to know they feel that they can do it without our help.
 - stated that EPA had established more than 20 wells, most at the same locations of existing wells, it is his perception that EPA is repeating and assisting rather than fill in the gaps - And SWP will ultimately fight like heck if EPA attempts to request require them to pay for ourselves rather than fill in data gaps (ie not accept their previous work) also stated that EPA told them it would be approximately 14 years before the data would be available
- SWP →
Wilmington

MEMORANDUM

TO: Charlotte Jesneck

FROM: G.Doug Rumford
Hydrogeologist, NC Superfund

GDR

DATE: 1/13/97

SUBJECT: Southern Wood Piedmont
Gulf, Chatham County, North Carolina
NCD 053 488 557
Request for Remediation Goals

Charlotte:

Southern Wood Piedmont Co. has contracted with ViroGroup, Inc. to prepare a Remedial Action Plan for voluntary cleanup at the Gulf, NC site. Please find attached a copy of the ViroGroup letter of request for the Inactive Hazardous Sites Branch to calculate groundwater remediation goals for several constituents found at the site.

cc: File
Pat DeRosa- Site Evaluation & Removal Branch



ViroGroup, Inc.
1445 Pisgah Church Road
Lexington, SC 29072
Phone 803-957-6270
FAX 803-957-3845

December 27, 1996

Mr. Doug Rumford, Hydrogeologist
North Carolina Department of Environment, Health and Natural Resources
NC Superfund Section
Post Office Box 27687
Raleigh, N.C. 27611-7687

Re: Groundwater Remediation Goals
Southern Wood Piedmont Facility
Gulf, North Carolina
ViroGroup, Inc. Project #12-53102.00

RECEIVED

DEC 31 1996

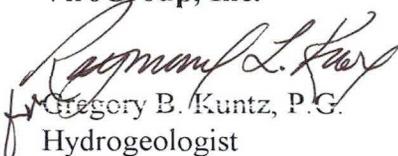
SUPERFUND SECTION

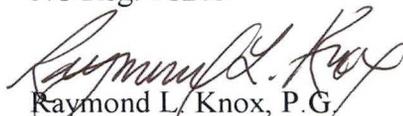
Dear Mr. Rumford:

ViroGroup, Inc. has been engaged by Southern Wood Piedmont (SWP) to prepare a Remedial Action Plan for the Gulf, NC site. The plan is being prepared in accordance with the NCDEHNR document Guidelines for Responsible Party Voluntary Site Remedial Action (RPVSRA) dated October 1996. Table C-2 of the document lists the groundwater remediation goals established by the Inactive Hazardous Sites Branch. Attached is a list of constituents identified in the groundwater at the site that do not appear in Table C-2. As specified in Section 3.2.2 of RPVSRA we are requesting the Branch to calculate the remediation goals for these constituents.

If ViroGroup or SWP can provide you additional information to aid in your calculations, please give us a call at (800)786-0654.

Sincerely,
ViroGroup, Inc.


Gregory B. Kuntz, P.G.
Hydrogeologist
NC Reg. #1203


Raymond L. Knox, P.G.
Senior Hydrogeologist
NC Reg. #622

cc: T.M. Davis - SWP w/ attachment

NA\531\02\RAP\GWRG.LTR

SWP Gulf, NC Constituents w/o Established Remediation Goals

SEMIVOLATILES

Carbazole

2,4,6-Trichlorophenol

*Benzo(b,k)fluoranthene ***

Benzo(a)pyrene

Indeno(1,2,3-cd)pyrene

Carbazole

Cresol (ortho)

Cresol m&p

Aniline

Fluorene

2-Methylnaphthalene

2,3,4,6-Tetrachlorophenol

VOLATILES

2-Butanone (MEK)

** Benzo (b,k) fluoranthene was separated in 1993

May 28, 1996

TO: Jack Butler
FROM: Pat DeRosa 
RE: Time line of events
Southern Wood Piedmont--Gulf, NCD 053 488 557
Gulf, Chatham County, NC

1946--1980 Wood treating plant operated on site using pentachlorophenol and creosote. Wood treating wastewater generated on site was stored in settling ponds, aeration ponds and applied to a 40-acre spray irrigation field on site. Facility closed 1980.

August 1980 SWP samples effluent from flocculation pond (phenols .32 mg/l).

1981 SWP files 103(c) notification under CERCLA.

January 1982 DEM collects sediment and water samples on and near the site. Metals, PCP and PAHs detected.

September 1983 EPA conducts SI on site. PCP and PAHs measured in soil on site and in downstream sediments. Chromium detected at levels above background in downstream sediments. Source unknown.

1987 PES conducts borings on site for Cherokee Brick.

1988 ETE installs wells to determine groundwater flow direction on site. No water quality data collected.

March 1990 Cherokee Brick proposes to accept contaminated soil from SWP for use in brick manufacture.

April 20, 1990 Hazardous Waste and Superfund Sections meet with SWP.

May 24, 1990 Division responds to Cherokee Brick proposal informing them of possible concerns with using soil from SWP site for brick manufacture.

Jack Butler
May 28, 1996
Page 2

June 8, 1990 Division and Superfund staff meet with Cherokee Brick. We indicate that to date we had not received any sampling results from Southern Wood Piedmont indicating contaminant levels in on site soils.

July 1990 Three (3) ponds in former process area excavated by contractors for SWP. Materials stockpiled and transported off site for thermal processing.

1990--1993 Geraghty and Miller conduct RI for SWP. No report submitted.

January 10, 1991 Superfund Section contacts SWP. SWP indicates that they have recently excavated 3 dry ponds on site and sent waste to Marine Shale in LA. Mr. Davis reiterates that, as indicated in the meeting with our Division on 20 April 1990, SWP is not interested in signing an AOC. He indicates he will submit the data on the cleanup when the cleanup is complete.

March 31, 1994 Superfund Section completes SIP recommending the site for further remedial action under CERCLA. Recommendation based on SI findings, potential contamination of Little Cedar Creek, and downstream wetlands and fisheries. Dioxin analysis of on-site soils not available.

June 8, 1994 EPA concurs with State recommendation and assigns site a high priority for ESI.

July 26, 1994 SWP contacts State to question findings of the SIP. SWP states CCA never used on site.

October 7, 1994 SWP submits RI report completed by Geraghty and Miller to State and EPA.

November 17, 1994 State, EPA, and SWP meet in Atlanta to discuss the site status.

December 6, 1994 SWP faxes proposed AOC(w/o strike through/underline) to the Division.

December 8, 1994 Letter from EPA to SWP as followup to meeting in Atlanta, November 17, 1994. EPA encourages SWP to continue discussion with the State.

Jack Butler
May 28, 1996
Page 3

December 9, 1994 DSWM meeting with SWP. SWP agrees to provide State with strike/through underline version of marked up State AOC.

December 14, 1994 Letter from Division to EPA clarifying Superfund Section role in SWP site. State will use ESI funding to oversee ESI/RI to be conducted by SWP under AOC with State.

February 24, 1995 Letter to SWP from Superfund Section summarizing telephone conversation of February 22, 1995. Proposed AOC and ESI/RI workplan in preparation. SWP expects to submit these to the State by March 1.

March 7, 1995 SWP submits a proposed AOC (w/o strike through/underline) and a proposed RI workplan outline. Letter indicates ESI field work scheduled to begin March 13, 1995.

March 10, 1995 Division notifies SWP of receipt of proposed AOC and requests a strike through/ underline version of proposed AOC. Division also notifies SWP that field work started before submittal and approval of the RI workplan might not meet State/EPA requirements and might need to be repeated in order to meet those requirements.

March 13, 1995 SWP submits strike through/underline version of proposed AOC to Division.

March 15-16, 1995 SWP submits RI workplan to State.

April 3, 1995 SWP provides State with marked-up copy of the proposed AOC. (Original sent March 13, 1995 not received by this office).

April 19, 1995 Superfund Section notifies Chatham County Health Dept. of scheduled ESI recon.

April 25, 1995 Superfund Section conducts on-site recon.

April 28, 1995 Superfund Section notifies Chatham County Health Dept. of scheduled ESI recon.

May 11, 1995 Superfund Section conducts recon to delineate downstream wetlands.

Jack Butler
May 28, 1996
Page 4

June 16, 1995 Superfund Section completes review of draft AOC proposed by SWP (received by Section April 3, 1995) and forwards revised draft to SWP.

June 27, 1995 Superfund Section conducts second recon to delineate downstream wetlands.

August 2, 1995 Superfund Section submits ESI-Related comments to SWP on the Draft Remedial Investigation Workplan (received by the State March 15-16, 1995).

September 13, 1995 SWP notifies State of its decision to proceed independently with assessment and cleanup of the site.

September 25, 1995 State notifies EPA of SWP's decision to proceed independently without an AOC with the State. State requests EPA approval to proceed with the ESI.

September 29, 1995 EPA approves State request to proceed with the ESI.

October 9, 1995 Superfund Section submits proposed ESI sampling plan to EPA for approval.

October 13, 1995 EPA approves State ESI sampling plan.

October 31, 1995 Superfund Section notifies Chatham County Health Dept. of ESI sampling event scheduled November 13, 1995.

November 13-14, 1995 Superfund Section conducts ESI sampling at the site.

January 22, 1996 Superfund Section receives validated VOC and SVOC data package from EPA ESD for ESI sampling..

January 29, 1996 Superfund Section receives validated metals data package from EPA ESD for ESI sampling.

May 10, 1996 Superfund Section receives validated dioxin/furan data package from EPA ESD for ESI sampling.

May 14, 1996 Superfund Section letter to EPA ESD requesting QA reevaluation of SVOC data package due to reporting errors.

P.O. Box 5447
Spartanburg, S.C. 29304
Phone: (803) 599-1070
FAX: (803) 599-1087



Southern Wood Piedmont Company

RECEIVED

NOV 07 1995

SUPERFUND SECTION

November 1, 1995

State of North Carolina
Department of Environment, Health & Natural Resources
P. O. Box 27687
Raleigh, NC 27611-7687

Attn.: Pat DeRosa, Head
CERCLA Branch
NC Superfund Section

Re: Gulf, NC

Dear Ms. DeRosa:

I am providing you with a copy of the workplan that SWP intends to carry out to provide the necessary information for us to complete a Remedial Action Plan. As stated earlier, we are not pleased that we were not able to reach an agreement to cooperate, but feel that this course of action is the only one available to us at this time. We will, of course, keep your Department apprised of our progress at this site.

Should you wish to discuss, please feel free to call me at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. M. Davis', with a large, sweeping flourish at the end.

T. M. Davis
Manager, Environmental Affairs

3565bw

CC: M. D. Pruett
T. H. Brannon
R. H. Watts
W. P. Arrants
W. H. Kitchens - Atty.

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

October 31, 1995

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



Mr. Jimmy Collins
Environmental Health Supervisor
Chatham County Health Department
Post Office Box 126
Pittsboro, NC 27312

COPY

RE: Expanded Site Inspection
Southern Wood Piedmont
NCD053488557

Dear Mr. Collins:

David Lilley of the NC Superfund Section spoke with you today to notify you that the NC Superfund Section will conduct a site inspection of the subject site located in Chatham County, North Carolina. The inspection will be conducted on November 13, 1995 by Doug Rumford of the NC Superfund Section.

The purpose of the inspection is to determine if the site poses a hazard to public health or the environment because of releases of contaminants to soil, surface water, groundwater, or air. The inspection team will take samples on and around the site to determine if a hazardous condition exists. Additionally, they will locate all nearby water supplies (surface and groundwater, community and private) and any close sensitive environments, schools, and day care centers.

This inspection is not an emergency situation but is a normal step in the evaluation of all uncontrolled and unregulated potential hazardous waste sites in North Carolina. You may want to have your representative meet the inspection team at the site. If so, please contact Doug Rumford at (919) 733-2801, extension 352 and he will coordinate a meeting.

If the inspection indicates the need for future study of the site, we will contact your office to advise. If you have any questions, please don't hesitate to call David Lilley or me at (919) 733-2801.

Sincerely,

Pat DeRosa, Head
CERCLA Branch
Superfund Section

Enclosures

cc: Phil Prete
Doug Holyfield
Pat Williamson
Scott Ross
David Lilley
Donna Keith

Federal
Trip Notification & Authorization

Prepared by: G. D. Rumford

Today's Date: 10/30/95

*Use Black Ink or Typewriter only-Staff to fill out first 2 blocks only.

Site Trip.

Date of Trip: 11/13/95

If trip date changed or cancelled note below:

Trip Date Changed To: _____ Cancelled: _____

NCD#: 053 488 557

Site Name: Southern Wood Piedmont

City: Gulf

County: Chatham

Reason for Trip: Expanded site Inspection Sampling

Name of Hotel (Overnight Trip): N/A

Hotel Telephone Number: () _____

Authorized by: _____

Industrial Hygienist

Project Team Leader: G.D. Rumford

Assistants: Zinn; Moore; Snavely; Franch; Bruce Nicholson; Parke

Attach To Notification Form: 1 copy each:

Submit to the
Industrial Hygienist

Preliminary Assessment Form (First page only)
Site Map
PA Transmittal Letter

(Please list appropriate County Health Department contact person to call to advise of trip)

Environmental Supervisor or Health Director to call: Mr. Jimmy Collins Title: Health

(Note if Dr., M.P., etc.)

Telephone Number: (919) 542-8208

Notes:

Health Department Official Contacted: Mr. Jimmy Collins

Back Up Letter Required: Yes No

Notified Mr. Collins on 10-31-95
(DBL)

Note: Signed original to Data Manager



ETE Division
ViroGroup, Inc.
1445 Pisgah Church Road
Lexington, SC 29072
Phone 803-957-6270
FAX 803-957-3845

October 25, 1995

Mr. T.M. Davis, Manager
Environmental Affairs
Southern Wood Piedmont Company
P.O. Box 5447
Spartanburg, South Carolina 29304

RECEIVED

NOV 07 1995

SUPERFUND SECTION

Re: Remedial Investigation Workplan for the
Collection of Corrective Action Data Needs
Gulf, North Carolina
ViroGroup, Inc. Project #12-53102.00

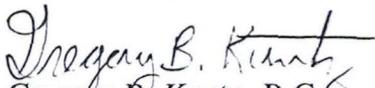
Dear Chuck:

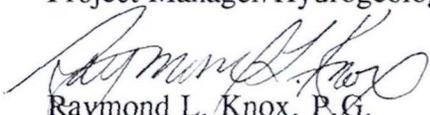
ViroGroup, Inc. is pleased to provide a remedial investigation workplan for the preparation of a soil, sediment, and groundwater corrective action plan for the Gulf, North Carolina facility. The data needs in this letter reflect the minimum requirements necessary for the preparation of a corrective action plan and are not designed to address additional concerns stated in guidance for CERCLA site inspections or the NCDEHNR Inactive Hazardous Waste Sites Program.

ViroGroup, Inc. appreciates the opportunity to provide this workplan for the Gulf facility. If you have any questions or need any further information, please feel free to give us a call.

Sincerely,

ViroGroup, Inc.


Gregory B. Kuntz, P.G.
Project Manager/Hydrogeologist


Raymond L. Knox, P.G.
Director of Hydrogeological Services

cc: Allen McEntire - ViroGroup, Inc.

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



September 29, 1995

Mr. T.M. Davis
Manager of Environmental Affairs
Southern Wood Piedmont Company
Post Office Box 5447
Spartanburg, South Carolina 29304

Subject: Southern Wood Piedmont Company
NCD 053 488 557
Gulf, Chatham County, North Carolina

Dear Mr. Davis:

Based on your letter of September 13, 1995, I understand that Southern Wood Piedmont Company plans to proceed voluntarily with assessment and remediation of the subject site without an agreement with the State. I have related this information to US EPA and have subsequently received their approval for the NC Superfund Section to proceed with the Expanded Site Inspection (ESI) of the site. We will be submitting an ESI sampling plan to EPA within the next two weeks and will then be able to coordinate with you on the sampling dates for the ESI.

Once our sampling plan is approved, we will forward a copy to you so that you may identify any samples for which you would like us to provide you with splits. If you would like any split samples, a company representative will need to accompany the State sampling team to the location for which a split sample is desired, provide the State team with containers for the splits, and accept custody of the samples on receipt from the State sampling team. Although I understand you are planning to proceed with an independent assessment, I believe that we may be able to avoid a duplication of effort if we coordinate our sampling activities.

Letter to T.M. Davis
September 29, 1995
page 2

I would appreciate your keeping us informed of any remedial activities which you plan to conduct prior to our ESI sampling so that we may adjust our sampling plan to accomodate changes in site conditions. If you have any questions, please contact me at (919) 733-2801, ext. 290.

Sincerely,



Pat DeRosa, Head
CERCLA Branch
NC Superfund Section

cc: Mike Kelly
Doug Rumford

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management



James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

September 25, 1995

Ms. Cynthia Gurley
NC CERCLA Project Officer
US EPA Region IV Waste Division 6th Floor
345 Courtland Street, NE
Atlanta, Georgia 30365

Subject: Southern Wood Piedmont Site
NCD 053 488 557
Gulf, Chatham County, NC

Dear Ms. Gurley:

As you know the NC Superfund Section met with representatives of Southern Wood Piedmont Company (SWP) in December 1994 at which time SWP indicated an interest in signing an Administrative Order on Consent (AOC) with the State to conduct a Remedial Investigation of the subject site. Subsequently, we contacted US EPA and proposed that resources allocated under the PA/SI cooperative agreement for an ESI at the site be used instead to negotiate an ESI/RI workplan and oversight work to be conducted by SWP under an AOC with the State.

Thus far we have been unable to reach agreement with SWP on the terms of an AOC. We have reviewed and commented on the ESI portion of the draft workplan submitted by SWP. On September 21, 1995, we received the attached letter in response. As indicated in the letter, SWP plans to proceed with assessment and remediation of the site independently without an agreement with the State and therefore without State review and oversight. Since the site is already listed on the State's approved 1995-96 ESI work program schedule, I propose that the NC Superfund Section proceed with conducting the ESI as originally planned so that a determination can be made as to whether this site warrants further remedial action under Superfund.

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages

To	Pat DeRosa	From	Cindy Gurley
Dept/Agency	NC Superfund	Phone #	
Fax #	919-733-4811	Fax #	EPA

NSN 7540-01-317-7308 5000-101 GENERAL SERVICES ADMINISTRATION

Letter to C. Gurley
September 25, 1995
page 2

In reviewing and commenting on SWP's workplan, we have essentially developed the ESI sampling plan and are ready to submit it to you on your approval to proceed with the ESI. Please contact me at (919) 733-2801 ext. 290 if you would like to discuss this further or need additional information.

Sincerely,



Pat DeRosa, Head
CERCLA Branch
NC Superfund Section

attachment

Approved: Cynthia Gurley Date: 9-29-95
Cynthia Gurley, NC CERCLA Project Officer

cc: Mike Kelly
Bernie Hayes
Doug Rumford
Charlotte Jasneck

Site: Southern Wood Piedmont
Gulf, Chatham County, NC.

* Continue with the ESI.

SWP Outf

RECEIVED

SEP 27 1995

PD

SUPERFUND SECTION

P.O. Box 5447
Spartanburg, S.C. 29304
Phone: (803) 599-1070
FAX: (803) 599-1087



Southern Wood Piedmont Company

September 13, 1995

State of North Carolina
Dept. of Environmental, Health and Natural Resources
Division of Solid Waste Management
P. O. Box 27687
Raleigh, NC 27611-7687

Attn: Pat DeRosa, Head
CERCLA Branch
NC Superfund Section

Re: ESI Related Comments to Proposed Workplan and Response to draft AOC

Dear Ms. DeRosa:

SWP has received and reviewed both your comments to the draft workplan and the draft Administrative Order on Consent (AOC). While we appreciate your efforts, SWP must decline your offer to execute the agreement as proposed. We have consistently repeated our concerns to signing an open ended agreement and stated on many occasions that we would be happy to develop a workplan and have it reviewed, and after reaching agreement, the workplan would become the attachment that the Order or Consent would address. We have consistently stated that we intended to complete assessment and remediation in a timely manner with or without an agreement.

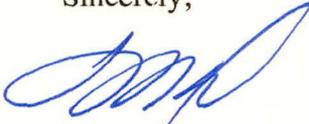
With this in mind, SWP is making plans to proceed without an agreement and voluntarily assess and remediate the site. We continue to welcome your input as regards this remediation.

Should you have any interest in going back and reviewing the "entire" workplan and working on an agreement to carry out that specific workplan, we stand ready to work with you. SWP will, however, be happy to provide the Agency copies of workplans and reports as they are available. We would also suggest that we continue to meet on a yearly basis to bring you up to date and to discuss work that will be done.

Page 2
PatDeRosa
NC Superfund Section
September 13, 1995

Should you wish to discuss further, please do not hesitate to call me at (803) 599-1075 or at the address above.

Sincerely,



T. M. Davis
Manager, Environmental Affairs

3528bw

CC: M. D. Pruett
T. H. Brannon
R. H. Watts
W. P. Arrants
W. H. Kitchens
Greg Kuntz - ViroGroup
Mike Kelly - DEHNR

Federal Files

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



June 16, 1995

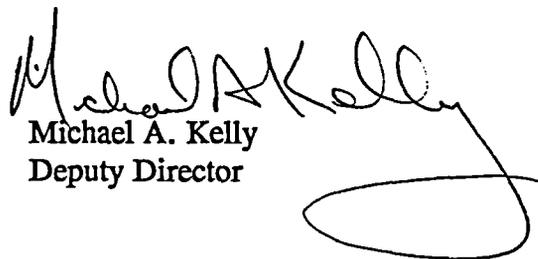
Mr. T.M. Davis
Manager of Environmental Affairs
Southern Wood Piedmont Company
Post Office Box 5447
Spartanburg, South Carolina 29304

Subject: Draft Administrative Order on Consent
Southern Wood Piedmont Company
NCD 053 488 557
Gulf, Chatham County, North Carolina

Dear Mr. Davis:

Enclosed for your review is a revised draft Administrative Order on Consent for assessment of the subject site. The enclosed order incorporates some of the suggestions included in the draft order submitted by Mr. Kitchens to the Superfund Section on April 3, 1995. If you plan to suggest revisions, please indicate these in the form of strike-throughs and underlinings of this latest version. If you have any questions, please contact me at (919) 733-4996, ext. 201 or Pat DeRosa, Superfund Section at (919) 733-2801, ext. 290.

Sincerely,


Michael A. Kelly
Deputy Director

Enclosure

cc: Pat DeRosa

Federal
Trip Notification & Authorization

Prepared by: D. Rumford

Today's Date: 4/28/95

*Use Black Ink or Typewriter only-Staff to fill out first 2 blocks only.

Site Trip

Date of Trip: May 11, 1995

If trip date changed or cancelled note below:

Trip Date Changed To: _____ Cancelled: _____

NCD#: 053 488 557

Site Name: Southern Wood Piedmont

City: Gulf

County: Chatham

Reason for Trip: Expanded site inspection & on-site Recor

Hotel (Overnight Trip): _____ Hotel Telephone Number: () _____

Authorized by: David B. Kelly
Industrial Hygienist

Project Team Leader: D. Rumford

Assistants: K. Stanley, _____

Attach To Notification Form: 1 copy each: Preliminary Assessment Form (First page only)
Submit to the Site Map
Industrial Hygienist PA Transmittal Letter

(Please list appropriate County Health Department contact person to call to advise of trip)

Environmental Supervisor or Health Director to call: Mr. Jimmy Collins Title: Supervisor
(Note if Dr., M.P., etc.)

Telephone Number: (919) 542-8208

Notes: Health Department Official Contacted: Ms. Wandrea Farrell
Back Up Letter Required: Yes _____ No _____

Notified Ms. Farrell for Mr. Collins on
4-28-95 (DBL)

Note: Signed original to Data Manager

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



April 27, 1995

TO: Ms. Jean Manuele
US Army Corps of Engineers

FROM: Irene Williams, Environmental Chemist *Irene Williams*
N.C. Superfund Section

RE: Southern Wood Piedmont (Gulf) Site
Wetland Delineation Request, Second Memo

This memorandum is a follow-up to my earlier request for delineation of wetlands on or adjacent to the site and downstream of the site. On April 25, 1995, Greg Kuntz of ViroGroup, and three members of the NC Superfund Section performed a reconnaissance of the site and a segment of Cedar Creek. Sampling locations have been staked and flagged at the confluence of the site drainage ditch with the creek and at points >300' and >600' downstream of the ditch.

When you meet Mr. William Arrants of the Southern Wood Piedmont Company (SWP) at 1:00PM, May 11, 1995 at the site, Doug Rumford and another member of our staff will be there to make sure that the sampling point(s) are properly placed in reference to wetland areas you find. Please help Doug to determine the extent of wetlands frontage that exists contiguous with Cedar Creek on each side of the creek, measuring from the confluence with the site drainage ditch downstream to our >600' stake (labeled TSD1). Earlier I had indicated that we were interested in continuous wetlands. It is actually the **total wetland frontage** that we need to know. If you find wetlands at the confluence of the creek and the drainage ditch, please determine the wetlands frontage that extends into the drainage ditch itself.

I have asked Mr. Charles Oldham, owner of off-site property that you will need to traverse, to contact you. He will give you permission to go onto his property. He also wishes to meet you there. If you would like to contact him, his telephone numbers are 919/775-5031(home) and 910/678-8298(work). Please contact Doug Rumford or Pat DeRosa at 733-2801 if you have any questions or if there are any changes in plans. Thank you very much for your help.

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



April 20, 1995

TO: Ms. Jean Manuele
US Army Corps of Engineers

FROM: Irene Williams, Environmental Chemist *Irene Williams*
N.C. Superfund Section

RE: Southern Wood Piedmont (Gulf) Site
Wetland Delineation Request

This morning you indicated that you and Southern Wood Piedmont Company (SWP) have agreed on your 1:00PM May 11, 1995 visit to their property in Chatham County to delineate potential wetlands on and adjacent to the above-mentioned site. This memorandum is sent as follow-up to our conversation.

The site is located on SR 2139 in Gulf, Chatham County. To reach the site from Raleigh one can take US Highway 1 southwest to Sanford to US Highway 421, proceed northwest on 421 to SR 2139 then north to the site. A copy of our site location map is attached.

The site is bordered by Cedar Creek to the north. The NC Superfund Section is interested in any wetlands adjacent to the site and within 15 miles downstream of the site. Specifically we need your help to ascertain whether there are wetlands on either one or both sides of Cedar Creek that extend (uninterrupted) from the probable point of entry to surface water (PPE) downstream for 300-600 feet from the PPE. The PPE is located at the confluence of the creek with a drainage ditch that runs along the western side of the site property. A site map is attached.

According to the Goldston quad of the National Wetlands Inventory maps there is a continuous linear wetland at Cedar Creek from the bridge at SR 2142 past the confluence with the site drainage ditch and continuing approximately another 1500 feet to an un-named tributary to the Creek.

Please inspect the creek and the drainage ditch on the Southern Wood Piedmont site and determine (a) whether wetlands exist at the drainage ditch and/or at the confluence of the ditch and creek, (b) whether there are wetlands on one or both sides of the ditch and/or Cedar Creek, and (c) the distance that wetlands extend downstream from their beginning at the ditch or its confluence with Cedar Creek (the PPE). This information is vital to our evaluation of this site under the US EPA Hazard Ranking System.

Specifically we need to know if a wetlands extends from either the ditch itself or the ditch/creek confluence far enough downstream to include at least 0.1 mile continuous wetland frontage. If wetlands exist on each side of the creek in this location, we would need only about 300 linear feet of wetland downstream for our scoring process. If wetlands exist on only one of the creek we would need about 600 linear feet of wetland downstream.

I anticipate that on May 11, 1995, representatives of SWP and/or their consultant, ViroGroup, Inc. will be at the site to meet you at the designated time of 1:00PM. Our representative, Doug Rumford, will be there as well. Please let us know if you need any more information or if there is any change in plans. After April 28 please contact Doug Rumford or Pat DeRosa since I shall be out of the office May 2-22, 1995.

I regret that we were unable to arrange this activity for Friday, April 14, 1995, as you had suggested. Thank you for your help.

Attachments

DRAFTER: N. JOHNSON

APPROVED: C. LOYDAHL

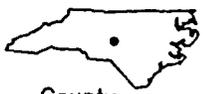
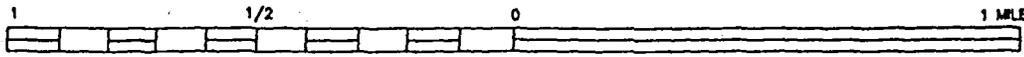
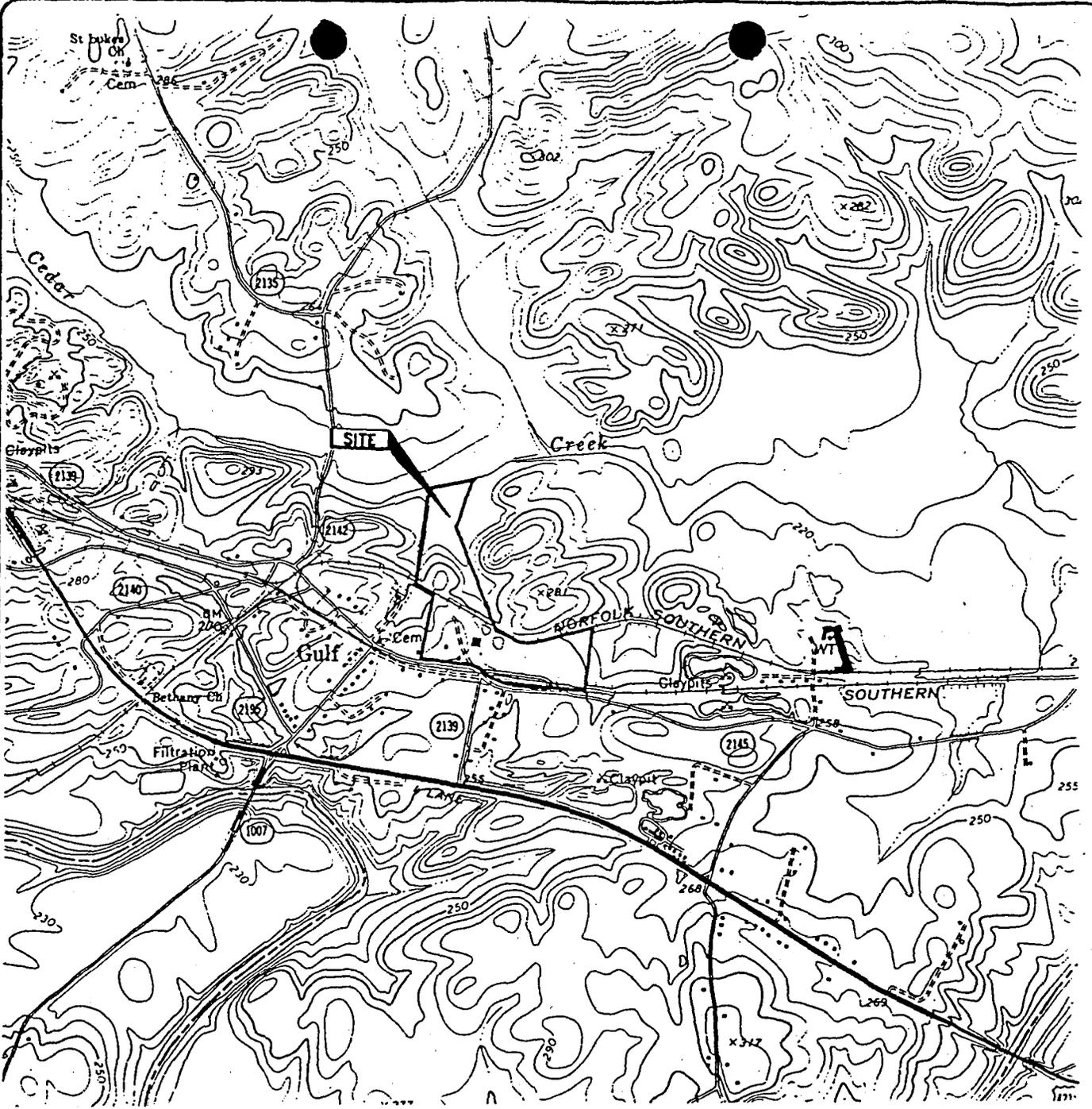
CHECKED: C. LOYDAHL

DRAWING: TDPD

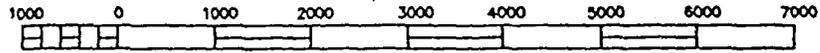
FILE NO.: MISC

PRCT NO.: NC0028.004

DWG DATE: 30 MAR 94



County Location



SCALE 1:24000

Contour Interval 10 Feet Datum is Mean Sea Level
U.S.G.S. 7.5 Minute Series GOLDSTON, N.C. Topographic Quadrangle.



SITE LOCATION TOPOGRAPHIC MAP

SOUTHERN WOOD PIEDMONT
GULF, NORTH CAROLINA

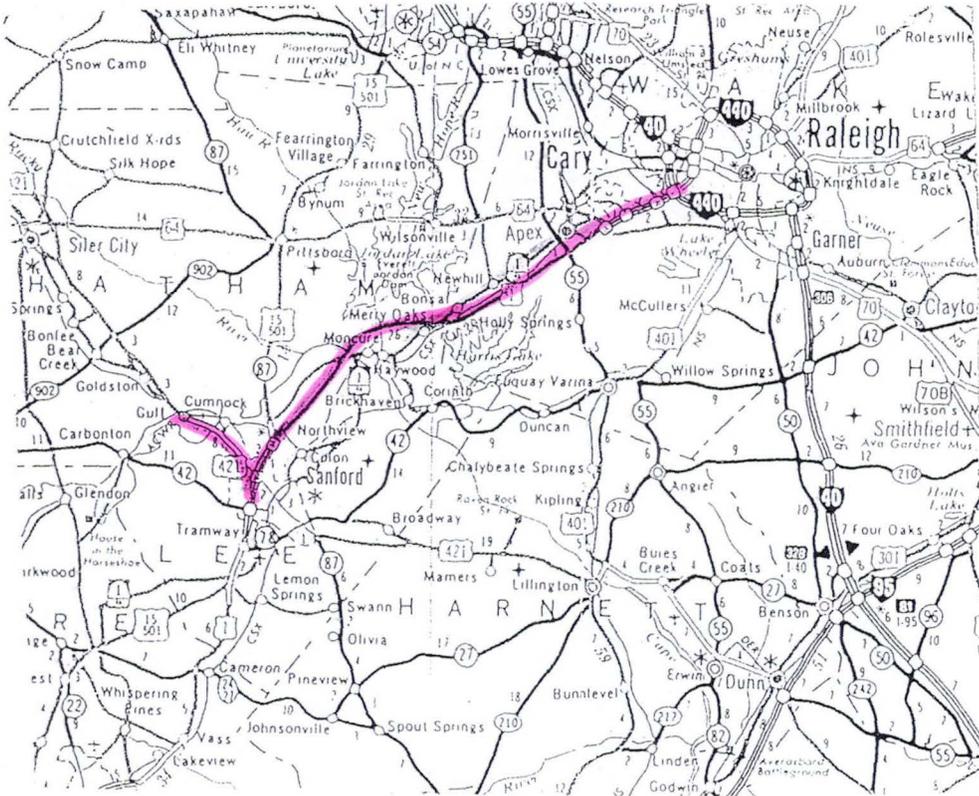
FIGURE

1-1

Figure 2

SOUTHERN WOOD PIEDMONT
(GULF) SITE
NCD 053 488 557

SITE LOCATION MAP



State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

April 19, 1995



Mr. Jimmy Collins
Environmental Health Supervisor
Chatham County Health Department
Post Office Box 126
Pittsboro, North Carolina 27312

COPY

RE: Expanded Site Investigation
On-Site Reconnaissance
Southern Wood Piedmont
NCD 053 488 557

Dear Mr. Collins:

David Lilley of the NC Superfund Section spoke with Joanne Keck of your office today to notify you that the NC Superfund Section will conduct a site reconnaissance of the subject site located in Chatham County, North Carolina. The reconnaissance will be conducted on April 25, 1995 by Irene Williams of the NC Superfund Section.

The purpose of the reconnaissance is to determine if the site poses a hazard to public health or the environment because of releases of contaminants to soil, surface water, groundwater, or air.

You may want to have your representative meet the reconnaissance team at the site. If so, please contact Irene Williams at (919) 733-2801 and she will coordinate a meeting. I am enclosing background data on the site for your information.

If the reconnaissance indicates the need for future study of the site, we will contact your office to advise. If you have any questions, please don't hesitate to call David Lilley or me at (919) 733-2801.

Sincerely,

Pat DeRosa, Head
CERCLA Branch
Superfund Section

Enclosures

cc: Phil Prete
Doug Holyfield
Pat Williamson
Scott Ross
David Lilley
Donna Keith

Federal
Trip Notification & Authorization

Prepared by: Irene Williams

Today's Date: 4/18/95

*Use Black Ink or Typewriter only-Staff to fill out first 2 blocks only.

Site Trip

Date of Trip: 4/25/95

If trip date changed or cancelled note below:

Trip Date Changed To: _____ Cancelled: _____

NCD#: 053 488 557

Site Name: Southern Wood Piedmont (Gulf)

City: Gulf

County: Chatham

Reason for Trip: Expanded site inspection; On-site reconnaissance

Name of Hotel (Overnight Trip): _____ Hotel Telephone Number: () _____

Authorized by: Doug B. Kelly
Industrial Hygienist

Project Team Leader: Irene Williams

Assistants: Doug Rufford, Harry Zinn

Attach To Notification Form: 1 copy each: Preliminary Assessment Form (First page only)
Submit to the Site Map
Industrial Hygienist PA Transmittal Letter

(Please list appropriate County Health Department contact person to call to advise of trip)

Environmental Supervisor or Health Director to call: Mr. Jimmy Collins Title: Health
(Note if Dr., M.P., etc.) Supervisor

Telephone Number: (919) 542-8208

Notes: Health Department Official Contacted: Joanne Keck

Back Up Letter Required: Yes No

Notified Ms Keck for Mr. Collins on
4-19-95 (DBL)

Note: Signed original to Data Manager

April 12, 1995

TO: File

FROM: Irene Williams, Environmental Chemist *Irene Williams*
N.C. Superfund Section

RE: Southern Wood Piedmont (NCD 053 488 557)
Teleconference with Mr. Ken Jolly, US Army Corps of
Engineers, 876-8441

On the above date I spoke with Mr. Jolly regarding their identification of the wetland at the PPE for the site (Cedar Creek). He will ask the person who covers Chatham County, Ms. Jean Manuele, to call me. He also indicated that unless someone had already asked the Corps to check the wetland, the information we need would not be in their files. Mr. Jolly mentioned that they need to schedule such activities a month in advance, but may be able to work it in earlier if they are in the area on another assignment.

Attachments

April 11, 1995

TO: File

FROM: Irene Williams, Environmental Chemist *Irene Williams*
N.C. Superfund Section

RE: Southern Wood Piedmont (NCD 053 488 557)
Teleconference with Mr. Greg Kuntz, ViroGroup, Inc.

On the above date, I spoke with Mr. Greg Kuntz, ViroGroup, Inc., 803/957-6270, again concerning the items requested earlier. Mr. Kuntz stated that historical aerial photographs of the site had not arrived at 10:30 this morning as expected, but that he will Federal Express them to us upon receipt them. He reported that the G&M raw data have been requested and are available. Some of the data have been archived and will take longer to obtain than that available by computer.

April 10, 1995

TO: File

FROM: Irene Williams, Environmental Chemist *Irene Williams*
N.C. Superfund Section

RE: Southern Wood Piedmont (NCD 053 488 557)
Teleconference with Ms. Cynthia Gurley, US EPA

On April 7, 1995 I spoke with Ms. Cynthia Gurley, EPA NC CERCLA Project Officer, US EPA Region IV Waste Division, 404/347-5059, ext. 6150, concerning questions that have arisen in reviewing the ESI/RI workplan developed by ViroGroup. We sent a follow-up memorandum by FAX today.

Attachment

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



FAX MEMORANDUM

DATE: April 10, 1995

TO: Ms. Cynthia Gurley
EPA NC CERCLA Project Officer
U.S. EPA Region IV Waste Division

FROM: Irene Williams, Environmental Chemist *Irene Williams*
NC Superfund Section

SUBJECT: Southern Wood Piedmont Site (Gulf)
Gulf, Chatham County, NC

We are reviewing the ESI portion of the ViroGroup Draft Remedial Investigation Workplan dated March 15, 1995 for this site to ensure that it meets US EPA requirements for the ESI prior to its implementation. On Friday, April 7, 1995 I spoke to you about questions that have arisen during this review that are pertinent to the ESI. The questions we discussed are given below. Item (1) is urgent since we plan to perform a reconnaissance of the site next week or soon thereafter.

- (1) To score this site it is essential that a release be demonstrated to a wetland at the PPE. Linear wetlands at this point are indicated on the appropriate National Wetlands Inventory map. Because of recent experience in this sort of situation and because of language in the proposed workplan that indicates skepticism on the part of the PRP regarding the wetlands, we need to find a "wetlands expert" to verify the existence of these wetlands. Please explain EPA's requirements in this regard. Can EPA provide an expert for this task? If not, perhaps an independent consultant can fill this role. If so, what certification would be required? I am hesitant to use an expert selected and paid by the PRP unless authorized by EPA to do so. We need to have such an expert with us for the recon.

- (2) The PRP plans to use Savannah Laboratories (SL) for analyzing the ESI samples. As we discussed, we will ask for use of a CLP laboratory; however, we need to be prepared to require data validation by ESD if a compromise is reached and SL is allowed to do the analytical work. This lab reportedly has the capability to perform CLP-quality work and to provide a downloaded data package to EPA or a third party for data validation. We would prefer that ESD perform data validation. Will you or Debbie Vaughan-Wright authorize this work by ESD?

- (3) We have requested the raw data from earlier sampling performed at the site for the Geraghty & Miller Remedial Investigation Report dated October 7, 1994. These data were used in source characterization and can be very useful to us for the ESI, but may require validation. Would we be able to have ESD validate these data as well as that mentioned in (2) above?

I look forward to hearing from you soon. Thank you.

April 10, 1995

TO: File

FROM: Irene Williams, Environmental Chemist
N.C. Superfund Section

RE: Southern Wood Piedmont (NCD 053 488 557)
Teleconference with Mr. William Arrants, Southern
Wood Piedmont

On April 7, 1995 I spoke with Mr. William Arrants, 803/599-1070, about items needed for review of the ESI/RI workplan developed by ViroGroup. We sent a follow-up FAX (attached) on the same date.

Today we received a FAX from Mr. Chuck Davis (attached) indicating a problem receiving our earlier FAX, so it was sent again. I called and spoke with the switchboard operator at Southern Wood Piedmont. She indicated that the one page FAX Memorandum had been received today.

Attachments

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



FAX MEMORANDUM

DATE: April 7, 1995

TO: Mr. William Arrants
Southern Wood Piedmont Company

FROM: Irene Williams, Environmental Chemist *Irene Williams*
NC Superfund Section

SUBJECT: Southern Wood Piedmont Site (Gulf)
Gulf, Chatham County, NC

We are reviewing the ESI portion of the ViroGroup Draft Remedial Investigation Workplan dated March 15, 1995 for the Gulf site to ensure that it meets US EPA requirements for the ESI prior to its implementation. Today I spoke to you about items we need for our review and for a reconnaissance we plan to make at the site next week or soon thereafter. The items we need at this time are:

- (1) Historical aerial photographs showing the former southern ponds, wood treatment area, drip tracks, wood storage areas, northern impoundments, spray irrigation field, etc. (cited in Garaghty & Miller (G&M) Remedial Investigation Report dated October 7, 1994)
- (2) Two references cited in G&M report:
 - (a) USEPA, 1993. Technology Selection Guide for Wood Treater Sites, Quick Reference Fact Sheet. Office of Emergency and Remedial Response, Emergency Response Division, Washington, DC, EPA540-F-93-020, May.
 - (b) USEPA, 1992. Superfund Accelerated Cleanup Bulletin: Presumptive Remedies For Wood Treatment Facilities. Office of Emergency and Remedial Response, Emergency Response Division, Washington, DC, May.
- (3) Raw data from G&M sampling for the above-mentioned report

Please send items 1 and 2 by FEDEX on Monday, April 10, 1995 and item 3 as soon as possible. Please let us know when to expect item 3. Thank you for your cooperation.

4-10-95

To: Irene Williams
From: Chuck Davis

Subject: Gulf Site
April 7 letter

We did not receive the letter by Fox. One page was partially received and an error code from the sender was received.

Please re-send this day ASAP

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management



James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

April 4, 1995

TO: Charlotte Jesneck, Head
Inactive Hazardous Sites Branch

FROM: Pat DeRosa, Head
CERCLA Branch

RE: Southern Wood Piedmont
NCD 053 488 557
Gulf, Chatham County, NC

Please find attached for your review the marked up copy of the proposed Administrative Order on Consent which I received today from the attorney representing Southern Wood Piedmont. Irene Williams is currently reviewing the proposed ESI/RI workplan for its adequacy in addressing ESI concerns. I have indicated to Chuck Davis with SWP that we would not approve the ESI portion of the workplan until the AOC was signed. I anticipate that review of the ESI workplan will be complete within a week and we will be sending comments to SWP at that time.

cc: Mike Kelly

attachments

ARNALL GOLDEN & GREGORY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

2800 ONE ATLANTIC CENTER
1201 WEST PEACHTREE STREET • ATLANTA, GEORGIA 30309-3450
TELEPHONE (404) 873-8500 • FACSIMILE (404) 873-8501

FIRST LIBERTY BANK TOWER
SUITE 1000
201 SECOND STREET
MACON, GEORGIA 31201
(912) 745-3344

WRITER'S DIRECT DIAL NUMBER
(404) 873-8644

WRITER'S DIRECT DIAL FACSIMILE
(404) 873-8645

April 3, 1995

VIA FEDERAL EXPRESS

Ms. Pat DeRosa
North Carolina Department of
Environment, Health & Natural Resources
401 Oberlin Road - Suite 150
Raleigh, North Carolina 27611-7687



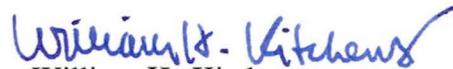
Re: Southern Wood Piedmont - Gulf, North Carolina

Dear Ms. DeRosa:

It is my understanding from your messages that you have been unable to locate the marked-up copy of the proposed Administrative Order on Consent that we sent to Mr. Meyer on March 13, 1995.

As you requested, I am enclosing another marked-up copy of the proposed AOC that we wish the Department to consider.

Yours sincerely,


William H. Kitchens

WHK/ams

Enclosure

cc: Mr. T.M. Davis

ARNALL GOLDEN & GREGORY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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March 13, 1995

Mr. William L. Meyer
State of North Carolina
Department of Environment, Health &
Natural Resources
Division of Solid Waste Management
401 Oberlin Road -- Suite 150
Raleigh, North Carolina 27611-7687

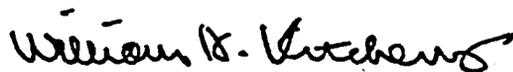
Re: Southern Wood Piedmont -- Gulf, North Carolina

Dear Mr. Meyer:

In response to your letter of March 10, 1995, enclosed please find a marked-up copy of the proposed AOC enclosed with my letter of March 7, 1995. Proposed modifications to the standard AOC are noted in this version.

Please call me if you have any questions.

Yours sincerely,



William H. Kitchens

WHK/ams
cc: Mr. T.M. Davis

Enclosure

204257.1



ETE Division
ViroGroup, Inc.
1445 Pisgah Church Road
Lexington, SC 29072
Phone 803-957-6270
FAX 803-957-3845

March 16, 1995

VIA FEDEX

Ms. Pat DeRosa
North Carolina Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
401 Oberlin Road - Suite 150
Raleigh, North Carolina 27611-7687

Re: Southern Wood Piedmont - Gulf, North Carolina
Remedial Investigation Workplan

Dear Ms. DeRosa:

Please find enclosed the Gulf Site-Specific Sampling and Analysis Plan for the Southern Wood Piedmont Company Gulf, North Carolina Facility. A remedial investigation workplan was submitted to your attention on March 15, 1995. An incorrect draft of the sampling and analysis plan was submitted with the workplan. Please remove the sampling and analysis plan currently present in the workplan. Discard this old sampling and analysis plan and replace it with this updated sampling and analysis plan. The sampling and analysis plan is located in Attachment C of the workplan. If you have any questions please feel free to contact us at (803) 957-6270.

Sincerely,

ViroGroup, Inc.

Raymond L. Knox, P.G.
Director of Hydrogeological Services

Gregory B. Kuntz, P.G.
Project Manager

cc: T.M. Davis
Southern Wood Piedmont

William H. Kitchens
Arnall, Golden and Gregory



ETE Division
ViroGroup, Inc.
1445 Pisgah Church Road
Lexington, SC 29072
Phone 803-957-6270
FAX 803-957-3845

March 15, 1995

VIA FEDEX

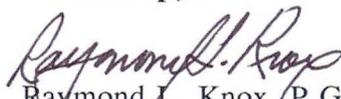
Ms. Pat DeRosa
North Carolina Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
401 Oberlin Road - Suite 150
Raleigh, North Carolina 27611-7687

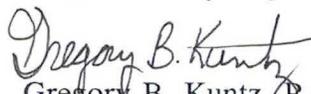
Re: Southern Wood Piedmont - Gulf, North Carolina
Remedial Investigation Workplan

Dear Ms. DeRosa:

On behalf of Southern Wood Piedmont we are presenting the enclosed detailed workplan for the referenced site. This workplan replaces Exhibit A (remedial investigation workplan outline) of the March 7, 1995 proposed Administrative Order of Consent submitted by Mr. William Kitchens. Attachment C - Gulf Site Specific Sampling and Analysis Plan will be provided under separate cover. A tab has been established for its insertion into the workplan document upon receipt. If you have any questions please feel free to contact us at (803) 957-6270.

Sincerely,
ViroGroup, Inc.


Raymond L. Knox, P.G.
Director of Hydrogeological Services


Gregory B. Kuntz, P.G.
Project Manager

cc: T.M. Davis
Southern Wood Piedmont

William H. Kitchens
Arnall, Golden and Gregory

ARNALL GOLDEN & GREGORY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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(912) 745-3344

WRITER'S DIRECT DIAL NUMBER
(404) 873-8644

WRITER'S DIRECT DIAL FACSIMILE
(404) 873-8645

March 13, 1995

STATE FILE

Mr. William L. Meyer
State of North Carolina
Department of Environment, Health &
Natural Resources
Division of Solid Waste Management
401 Oberlin Road -- Suite 150
Raleigh, North Carolina 27611-7687

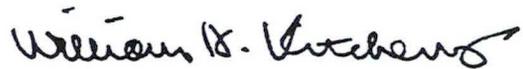
Re: Southern Wood Piedmont -- Gulf, North Carolina

Dear Mr. Meyer:

In response to your letter of March 10, 1995, enclosed please find a marked-up copy of the proposed AOC enclosed with my letter of March 7, 1995. Proposed modifications to the standard AOC are noted in this version.

Please call me if you have any questions.

Yours sincerely,



William H. Kitchens

WHK/ams
cc: Mr. T.M. Davis

Enclosure

204257.1

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



March 10, 1995

Mr. T.M. Davis, Manager
Environmental Affairs
Southern Wood Piedmont Company
P.O. Box 5447
Spartanburg, South Carolina 29304

Subject: Southern Wood Piedmont site
NCD 053 488 557
Gulf, Chatham County, NC

Dear Mr. Davis:

On March 8, 1995, the Superfund Section received a proposed Administrative Order on Consent (AOC) and a draft Remedial Investigation Workplan Outline for the subject site from Mr. William H. Kitchens representing Southern Wood Piedmont Company. In the cover letter, Mr. Kitchens indicated that the field work for the ESI was scheduled to begin on March 13, 1995.

On February 24, 1995, Pat DeRosa with the Superfund Section wrote to you indicating that the AOC for the investigation phase must be finalized and signed prior to approval of the ESI/RI workplan. In addition she indicated that ESI sampling conducted prior to Section approval of the workplan or without Section oversight might need to be repeated or duplicated. Therefore, any ESI sampling conducted on March 13, 1995 or prior to the approval of the workplan may not meet sampling requirements for the ESI.

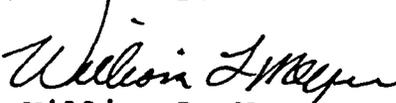
In order to expedite review of the proposed investigation AOC, we request that you send us a "strike through/ underline" version of the proposed AOC within 7 days of receipt of this letter. This was originally requested by the Superfund Section during the December 9, 1994 meeting. In addition, we request that you forward the completed ESI/RI Workplan to this office so that the staff can begin review as soon as the AOC is finalized.

Mr. Davis
March 10, 1995
Page 2

A signed AOC represents a good faith effort on the part of the responsible party to work with the State. Activities conducted outside of the signed AOC are considered an "independent remedial action" and may not be reviewed until the remedial action is complete at which time it may be determined that additional work is needed. If you choose to pursue the latter option, it would be our recommendation that EPA task the ESI field work to the NC Superfund Section or to their own contractors for completion. This would address EPA's need to determine whether the site is NPL-caliber.

If you would like to meet or discuss this further please contact Pat DeRosa at (919) 733-2801 or me at (919) 733-4996.

Sincerely,


William L. Meyer

cc: Mike Kelly
Pat DeRosa
Charlotte Jesneck

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



February 24, 1995

Mr. T.M. Davis, Manager
Environmental Affairs
Southern Wood Piedmont Company
P.O. Box 5447
Spartanburg, South Carolina 29304

Subject: Southern Wood Piedmont Site
NCD 053 488 557
Gulf, Chatham County, NC

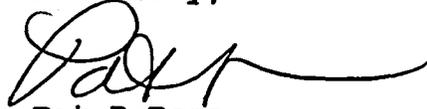
I am writing to follow up on our telephone conversation of February 22, 1995 regarding the subject site. As we discussed I understand that contractors for Southern Wood Piedmont Company (SWP) have prepared the Expanded Site Inspection/Remedial Investigation (ESI/RI) workplan and that I should be receiving that workplan from you by March 1, 1995. As I indicated on the telephone, this workplan should be complete, including the section on sampling methods and analysis, so that we can determine whether the workplan meets US EPA sampling and analysis protocol.

I also understand that contractors for SWP are preparing draft Administrative Orders on Consent to be negotiated with the Inactive Hazardous Sites Branch to clarify the terms of the investigation and remediation phases of the work to be conducted by SWP at the subject site. The AOC for the investigation phase will need to be finalized prior to Section approval of the ESI/RI workplan. Please note that ESI sampling conducted prior to Section approval of the workplan or without Section oversight may need to be repeated or duplicated. It is the Section's intention to review the ESI portion of the workplan and ensure that it meets US EPA requirements for the ESI prior to its implementation. We also intend to be present to overview the collection of all ESI samples to verify sampling locations and ensure that appropriate sampling protocol is followed.

Letter to Mr. Davis
Feb. 24, 1995
page 2

As we discussed, please contact Charlotte Jesneck regarding the status of the draft AOC's which I understand are in preparation by contractors for Southern Wood Piedmont Company. Both Ms. Jesneck and I can be reached at (919) 733-2801.

Sincerely,



Pat DeRosa
CERCLA Branch Head
Superfund Section

cc: Mike Kelly, Deputy Director, DSWM
Charlotte Jesneck, IHS Branch Head
Irene Williams, Project Manager

February 22, 1995

TO: File

FROM: Pat DeRosa, CERCLA Branch Head 
Superfund Section

RE: Southern Wood Piedmont, NCD 053 488 557
Gulf, Chatham County, NC

On February 22, 1995, I spoke by telephone with Chuck Davis, Manager Environmental Affairs, Southern Wood Piedmont Company (803) 599-1075, regarding the status of (1) the ESI/RI workplan and (2) the assessment and remediation AOC's which were all to be drafted by SWP and submitted to the Section for review and comment. Mr. Davis said that I could expect the ESI/RI workplan within 1 week. I asked him to send it to my attention since Mike Kelly would be out of town. He said he would be sending four (4) copies to me. He said that he would not be enclosing a copy of the "boiler plate" sampling methods and analysis section of the report since it was so large and would send it later. I requested that he go ahead and include one (1) copy of it in the workplan he was sending now so we could be reviewing it to ensure that it would meet EPA sampling and analysis protocol.

I told Mr. Davis that we would like to have the sampling for the ESI complete by the end of April 1995 so that we could submit the ESI report to EPA by our September 30, 1995 deadline. He said that sounded alright and that in fact they would probably start on the sampling after they sent the workplan out to us. I indicated to him that we needed to be present on site to observe the ESI sampling so that the sampling locations and protocol could be verified and so that the ESI sampling would not need to be duplicated. He said he understood.

I asked Mr. Davis about the status of the AOC's that SWP was supposed to be drafting. He said he would check with Ray Knox, the consultant with Viro Group who was now handling the project. I asked him to call Charlotte Jesneck after speaking with Mr. Knox and let her know where they were with the AOC preparation.

cc: Mike Kelly
Charlotte Jesneck
Irene Williams



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

December 8, 1994



4WD-NSRB

Mr. T. M. Davis, Manager
Environmental Affairs
Southern Wood Piedmont Company
P. O. Box 5447
Spartanburg, South Carolina 29304

SUBJ: Southern Wood Piedmont Site, Gulf, Chatham County,
North Carolina (the Site)

Dear Mr. Davis:

Thank you for taking the time to travel to the Region IV offices here in Atlanta on November 17, 1994, to discuss the inactive Southern Wood Piedmont (SWP) facility located in Gulf, Chatham County, North Carolina. The presentation made by your consultants was very informative, and contributed to a more complete understanding of the Site. SWP is to be commended for the proactive stance that it has taken towards remediation of the Site, and its plans to continue that process.

As the technical presentation indicated, however, considerable waste material is, in all likelihood, still present at the Site, and a full characterization of the Site has not yet been conducted. The data presented, both in the report prepared by Geraghty & Miller and in the meeting, have not been sufficient to significantly alter EPA's position regarding the most efficient manner in which to address potential impacts to human health and the environment associated with the Site. As a result, it is EPA's intention to proceed with the Expanded Site Inspection (ESI), in conjunction with, and assisted by, the North Carolina Department of Environment, Health, and Natural Resources (NCDEHNR). The data gathered as part of this ESI will be used to prepare a Hazard Ranking Scoring (HRS) Package for the Site. Should the HRS score exceed 28.5, the Site will become eligible for listing on the National Priorities List.

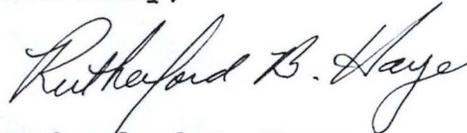
EPA would like to encourage, however, continued discussions between SWP and NCDEHNR regarding investigation and remediation of the Site under State authority and oversight. Should an agreement between SWP and NCDEHNR be reached, it is possible that the data gathered by SWP could be used for the purpose of HRS scoring, obviating the need for a separate ESI. As discussed in our meeting, in order to serve this purpose, any investigation

carried out under State authority would have to be of the same scope, extent and quality as would be achieved in an ESI.

In addition, EPA continues to believe that significant advantages would exist for all parties should EPA and SWP enter into a similar agreement for investigation of the Site, in the event that such an agreement is not reached between SWP and NCDEHNR or in addition to a State agreement. As suggested in the meeting of November 17, 1994, that agreement would most appropriately be in the form of an Administrative Order on Consent (AOC) by which SWP agrees to conduct a combined ESI/Remedial Investigation. Should SWP wish to discuss that possibility further, EPA would be happy to meet with you again for that purpose.

Again, thank you for your time and attendance. Should you have any questions, or wish to discuss the possibility of entering into an AOC, please contact either myself, at (404) 347-7791, ext. 4103, or Mr. Seth Bruckner, Assistant Regional Counsel, at (404) 347-2641, ext. 2268.

Sincerely,



Rutherford B. Hayes
Remedial Project Manager
North Superfund Remedial Branch

cc: Seth Bruckner, ORC/EPA
Pat DeRosa, NCDEHNR

October 19, 1994

TO: File

FROM: Irene Williams, Environmental Chemist *Irene Williams*
N.C. Superfund Section

RE: Southern Wood Piedmont Gulf Site (NCD 053 488 557)
Fishing conditions in surface water pathway

Pursuant to a January 25, 1994, conversation, I spoke again on the above date with Mr. Raebon King, owner of the J.R. Moore and Sons Store in Gulf, NC, 919/898-9901. I asked him for any more recent information that he had regarding fishing at Cedar Creek. He reported that as far as he knew no fishing had taken place since our earlier conversation, but, while I waited, he conferred with a worker from the Department of Transportation (DOT) who had been working on a new bridge over Cedar Creek at Henry Oldham Road for approximately two months. The DOT worker told Mr. King that he had observed minnows, snakes, and turtles in the Creek.

I checked with Ms. Hilda Westbrook at the DOT (733-3250, Secondary Roads, SR) and learned that Henry Oldham Road is SR 2142. From the topography, the bridge in question is located at Cedar Creek about 0.4 mile upstream of the probable point of entry (PPE) to surface water.



October 7, 1994

Mr. Bernie Hayes
USEPA Region IV
Waste Management Division
345 Courtland Street, NE
Atlanta, GA 30365

Re: Remedial Investigation Report
Southern Wood Piedmont Company, Gulf, North Carolina

Dear Mr. Hayes:

On behalf of Southern Wood Piedmont Company, Geraghty & Miller, Inc. is submitting herewith four (4) copies of the above-referenced report, Volumes I and II for your review. One (1) copy of Volume III, an appendix containing laboratory reports, is included in this submittal. Two copies of Volumes I and II, and one copy of Volume III have also been provided to the North Carolina Department of Environment, Health, and Natural Resources, Division of Solid Waste Management, Superfund Section.

Sincerely,

GERAGHTY & MILLER, INC.

Christopher W. Lovdahl
Project Manager

CWL/jbw

Enclosures

cc: \ Ms. Pat DeRosa, NCDEHNR
Mr. T. M. Davis, Southern Wood Piedmont Company
Brooke Dickerson, Esq., Arnall Golden & Gregory



P.O. Box 5447
Spartanburg, S.C. 29304
Phone: (803) 599-1070
FAX: (803) 599-1087



Southern Wood Piedmont Company

July 26, 1994



North Carolina Dept. of Environment, Health & Natural Resources
Superfund Section
Division of Solid Waste
401 Oberlin Road
Raieigh, NC 27605

Attn: Pat DeRosa
CERCLA Branch Head

Re: Southern Wood Piedmont
Gulf, NC Site
NCD 053 488 557

Dear Ms. DeRosa:

Southern Wood Piedmont is in receipt of your March 1994 report entitled "Site Inspection Prioritization", and find that the conclusions reached are flawed because some assumptions used are incorrect. The executive summary states that analytical results recorded elevated levels of metals arsenic, chromium, copper, lead and mercury in surface water and sediment.

While it is not disputed that you could have detected these metals, SWP, or its predecessor, has never treated with copper chromated arsenate (CCA) at this site. We have also never used a preservative that contained lead or mercury. In all likelihood, what you have seen is an artifact of naturally occurring metals from unfiltered samples. The fourth paragraph again indicates that levels of chromium significantly above background were found in soils from the drainage ditch. Since SWP did not treat with CCA, this can only be from naturally occurring metals or from another source other than SWP. The second page of the executive summary indicates that surface water is a significant pathway. We do not believe that this is an accurate statement. No area where visible contamination exist remains exposed. In fact, several areas have been remediated and backfilled with clean, off-site fill. No risk of dermal exposure exist. As noted earlier in this paragraph, no areas of any contamination remains exposed. We do acknowledge low levels of groundwater contamination, however since all residences are on a water system and no off-site contamination is indicated, this pathway should be of no immediate concern.

Page 2
NCDEHNR
July 26, 1994

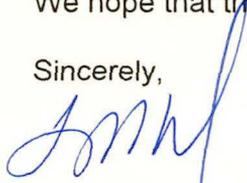
You will find several other places throughout the report where incorrect information has been used to reach a conclusion. Without singling out each one, a short list of the more troublesome statements is as follows:

- Section 2.3 - you indicate that SWP used CCA from 1946 until 1980. SWP, or the predecessor company have never used CCA.
- Section 3.2 - states that arsenic, chrome, copper, lead and mercury were found and attributed to SWP.
- Section 3.2, Page 8 - states that chromium was found in soil ... at significantly above background. SWP did not treat with CCA so chromium would have to be an artifact of naturally occurring metals from unfiltered samples or either from another source.

Southern Wood Piedmont believes that if you remove from your equations the data from constituents not from SWP, and correct the pathways of concern, then this site would not warrant a high priority, but a very low priority. SWP is in the final stages of finalizing a comprehensive assessment report and is at present developing options for remediation to be submitted to the Agency. This will be submitted by the beginning of the fourth quarter of this year. We stand ready to discuss this report, as well as, the current conditions at the site at any time, but would hope that this information would cause a corrected site prioritization report to be completed which more accurately reflects the history of the site.

Please feel free to call me at (803) 599-1075 at any time to discuss or to set up a meeting. We hope that this clarification will result in the Agency reconsidering the high priority rating.

Sincerely,



T. M. Davis
Manager, Environmental Affairs

3166bw

CC: M. D. Pruett
W. P. Arrants
W. H. Doucette
Glenn Dunn - Poyner & Spruill



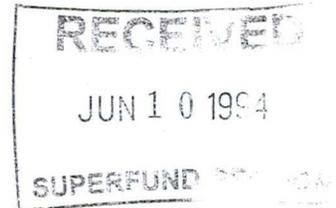
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4WD-WPB

JUN 08 1994



Ms. Pat DeRosa, Head
CERCLA Branch
North Carolina Department of Environment,
Health and Natural Resources
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Dear Ms. DeRosa:

The following Site Inspection Prioritization (SIP) reports have recently been reviewed and accepted by EPA - Region IV Site Assessment Section:

Durham Animal Clinic (Dynamac) NCD981016280	NFRAP
Southern Wood Piedmont Gulf NCD053488557	High Priority for ESI
Fawn Plastics Co. (Dynamac) NCD067178707	NFRAP
GTE Sylvania (Dynamac) NCD009305699	NFRAP
Singer Co. Furniture Div. (Dynamac) NCD072012354	High Priority for ESI
Firestone Tire & Rubber Co. (Dynamac) NCD067191262	NFRAP
Georgia Pacific Hardwood Sawmill (Dynamac) NCD000813592	High Priority for ESI
W.C. Richards Co. Inc. (Dynamac) NCD060306727	NFRAP
Pfizer, Inc. (Dynamac) NCD057037178	NFRAP

Copies of the reports prepared by EPA contractor, Dynamac, are being sent separately. If you have any questions concerning these site decisions, please call me.

Sincerely,

Cathy Amoroso
Environmental Scientist

January 10, 1994

TO: File

FROM: Irene Williams, Environmental Chemist *Irene Williams*
N.C. Superfund Section

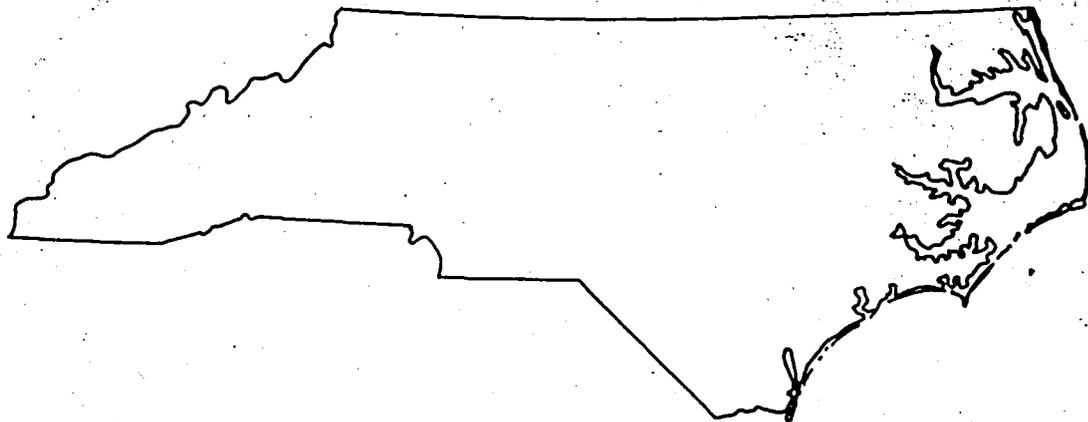
RE: Southern Wood Piedmont Gulf Site (NCD 053 488 557)
Status of Cedar Creek flow in 1983

In the USEPA FIT report of May 31, 1994 it was noted that "Surface water samples could not be collected because the on-site drainage ditches and Little Cedar Creek (intermittent stream) were dry." Since the site is bordered on the south by Cedar Creek, not Little Cedar Creek, I verified that on the topographic maps Cedar Creek is shown as a perennial stream. With this in mind, I referred to the document, Water Resources Data, North Carolina, Water Year 1983 (see attachment) and found that for the Deep River, and presumably its tributaries, water flows were very low in September of 1983 when the FIT investigation took place.

Attachment



Water Resources Data North Carolina Water Year 1983



U.S. GEOLOGICAL SURVEY WATER-DATA REPORT NC-83-1
Prepared in cooperation with the North Carolina
Department of Natural Resources and
Community Development, and with other
State, municipal, and Federal agencies

02102000 DEEP RIVER AT MONCURE, NC

LOCATION.--Lat 35°37'38", long 79°06'58", Lee County, Hydrologic Unit 03030003, on right bank 1.0 mi upstream from Lockville Dam, 1.2 mi upstream from bridge on U.S. Highway 1, 1.5 mi northwest of Moncure, 2.2 mi downstream from Rocky River, and 4.5 mi upstream from confluence with Haw River.

DRAINAGE AREA.--1,434 mi²

WATER-DISCHARGE RECORDS

PERIOD OF RECORD.--July 1930 to current year. Records for May, 1898 to December, 1899 published in 21st Annual Report, Part 4, and in Bulletins 34 and 39 of North Carolina Department of Conservation and Development have been found to be unreliable and should not be used.

REVISED RECORDS.--WSP 1082 (1930-46 not previously published) WDR NC-81-11 Drainage area.

GAGE.--Water-stage recorder. Datum of gage is 185.06 ft (56.406 m) National Geodetic Vertical Datum of 1929.

REMARKS.--Water-discharge records good. Diurnal fluctuation and some regulation at low flow caused by small powerplants above station. Convertible data collection platform at site.

AVERAGE DISCHARGE.--53 years, 1,456 ft³/s, 13.79 in/yr.

EXTREMES FOR PERIOD OF RECORD.--Maximum discharge, 80,300 ft³/s Sept. 18, 1945; gage height, 17.20 ft; minimum, 5.5 ft³/s Oct. 10, 1954, gage height, 0.35 ft.

EXTREMES FOR CURRENT YEAR.--Peak discharges above base of 15,000 ft³/s and maximum (*),

Date	Time	Discharge (ft ³ /s)	Gage height (ft)	Date	Time	Discharge (ft ³ /s)	Gage height (ft)
Feb. 15	0400	18500	8.28	Mar. 21	1500	16400	7.82
Mar. 18	2200	*28300	*10.04	Apr. 16	0600	17000	7.96

Minimum discharge, 56 ft³/s Sept. 12, gage height, 0.82 ft.

DISCHARGE, IN CUBIC FEET PER SECOND, WATER YEAR OCTOBER 1982 TO SEPTEMBER 1983
MEAN VALUES

DAY	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
1	184	302	323	2580	796	2740	3380	1040	498	391	83	107
2	153	264	588	1990	2730	4640	2930	960	478	372	86	112
3	129	253	800	3060	7490	3110	5170	904	430	392	83	647
4	116	244	713	3600	4490	2030	7600	892	414	478	79	275
5	118	853	549	2330	2110	1590	3460	1030	344	458	96	173
6	104	1680	490	1850	2390	3410	2280	1100	363	355	122	135
7	119	871	519	1470	9090	13000	2050	837	422	392	200	113
8	102	485	775	1180	5920	11400	2580	699	669	418	126	97
9	90	406	543	1000	3230	4960	3340	638	1250	255	104	87
10	87	338	406	896	2100	4180	3460	652	1020	203	122	76
11	94	307	357	844	6590	2730	3800	624	587	206	130	65
12	163	269	4340	827	8880	2240	2610	561	395	192	115	59
13	186	271	9580	824	3960	1770	1870	536	351	170	126	70
14	204	364	4060	753	6010	1460	1540	524	321	183	103	107
15	576	534	1650	686	15800	1270	2950	488	292	133	94	127
16	711	503	4020	630	14300	1150	13900	527	300	144	87	155
17	321	432	9940	627	7490	1080	10500	787	292	110	81	119
18	223	410	5100	583	2840	14700	3730	1370	276	103	80	180
19	203	328	1970	545	2120	19300	2980	853	279	105	79	156
20	152	311	1370	521	1730	15700	2750	586	712	155	75	125
21	139	285	1170	478	1460	13300	2030	1570	800	152	68	111
22	143	297	983	804	1280	11300	1640	3380	2220	128	64	152
23	136	299	820	4650	3130	4610	1430	2480	1510	114	62	192
24	122	299	718	3420	6610	2520	4850	2810	908	100	72	214
25	535	274	664	2190	4250	2410	7830	1550	564	95	117	165
26	4390	250	592	1490	3250	3900	3620	922	373	94	91	127
27	3410	253	589	1110	2270	3210	2180	806	309	91	97	95
28	1270	225	596	1000	1720	4920	1660	760	304	84	122	84
29	672	272	539	1100	---	5010	1370	637	273	84	123	118
30	441	279	608	1020	---	2750	1170	497	338	83	123	102
31	330	---	1400	879	---	2310	---	487	---	80	142	---
TOTAL	15623	12158	56772	44937	134036	168700	110660	31507	17292	6320	3152	4345
MEAN	504	405	1831	1450	4787	5442	3689	1016	576	204	102	145
MAX	4390	1680	9940	4650	15800	19300	13900	3380	2220	478	200	647
MIN	87	225	323	478	796	1080	1170	487	273	80	62	59
CFSM	.35	.28	1.28	1.01	3.34	3.80	2.57	.71	.40	.14	.07	.10
IN.	.41	.32	1.47	1.17	3.48	4.38	2.87	.82	.45	.16	.08	.11

CAL YR 1982 TOTAL 689286 MEAN 1888 MAX 22400 MIN 83 CFSM 1.32 IN 17.88
WTR YR 1983 TOTAL 605502 MEAN 1659 MAX 19300 MIN 59 CFSM 1.16 IN 15.71

December 22, 1993

TO: File

FROM: Irene Williams, Environmental Chemist *Irene Williams*
N.C. Superfund Section

RE: Southern Wood Piedmont Gulf Site (NCD 053 488 557)
Fishing conditions in surface water pathway

On 12/20/93 I spoke with Franklin McBride, Wildlife Resources Commission, Boating and Inland Fisheries, 733-3633, concerning fishing conditions in Cedar Creek and the Deep River. He indicated that the Deep River is fished but provided no harvest data. He could find no record of Cedar Creek as a fishery, but referred me to Ms. Sherry Bryant, District Biologist (910/449-7625).

Ms. Bryant and I talked on 12/21/93. She suggested I contact an enforcement person and gave me the following names and numbers:

Julian Alman, Siler City, 919/663-3048
Bryan Scruggs, Sanford, 919/776-1028.

Since I was unable to reach either of these persons, I contacted Frederick Harris of Wildlife Resources on 12/22/93, 733-3633. Mr. Harris and I discussed the location, flow rate, length and classification ("C, aquatic life propagation and survival, fishing, wildlife, secondary recreation, and agriculture", Classifications and Water Quality Standards Assigned to the Waters of the Cape Fear River Basin, N.C. Department of Environment, Health, and Natural Resources, February 1, 1993) of Cedar Creek.

According to Mr. Harris, any stream in the Piedmont that is capable of supporting fishing and is accessible, especially from bridges, such as those over State Roads 2142 and 2145 in the case of Cedar Creek, will be fished. From this discussion, I decided it might be valid to consider Cedar Creek a fishery, with light fishing pressure, for purposes of evaluating the 15-mile surface water pathway for the site.

We also discussed the fact that the Deep River is heavily fished. No harvest data is available for either stream.

December 21, 1993

TO: File

FROM: Irene Williams, Environmental Chemist *Irene Williams*
N.C. Superfund Section

RE: Southern Wood Piedmont (NCD 053 488 557)
Teleconference with Mr. Michael Pruette, Southern
Wood Piedmont

In the absence of Mr. Chuck Davis, I spoke on the above date with Mr. Michael Pruette, Manager of Environment and Engineering for Southern Wood Piedmont, 803/599-1070, to ascertain whether he had any reports and/or analytical data he could share with me at this time. He indicated that Southern Wood Piedmont has performed an extensive environmental assessment at the site and that a report is in progress. The company prefers not to share analytical results until the entire report is completed.

He mentioned an order from Ms. Charlotte Jesneck, N.C. Superfund Section, for which Southern Wood Piedmont was given 180 days from October 18, 1993, to produce certain data. Mr. Pruette said that the company will be able to meet that deadline.

I talked with Ms. Jesneck about Mr. Pruette's comment. Ms. Jesneck indicated that Southern Wood Piedmont had been granted an extension of 6 months to comply with an earlier order to affix analytical data pertinent to the contaminants on the site to the deed for the property.

October 26, 1993

TO: File

FROM: Irene Williams, Environmental Chemist *Irene Williams*
N.C. Superfund Section

RE: Southern Wood Piedmont (NCD 053 488 557)
Second teleconference with Mr. T.M.(Chuck) Davis,
Southern Wood Piedmont

On the above date I spoke with Mr. Chuck Davis, 803/599-1075, to follow up on our October 15, 1993 teleconference, during which he had volunteered to prepare tables and a site sampling map to send us. Since I had not yet received mail from Southern Wood Piedmont, I called to inquire and remind.

Mr. Davis said that there were several documents in and that he was gathering data for us. He indicated he should have something available by the end of next week or the next. He mentioned that the assessment report was now in typing, and said he would keep me posted.

When asked, Mr. Davis replied that no sampling had been performed for dioxin.

October 15, 1993

TO: File

FROM: Irene Williams, Environmental Chemist *Irene Williams*
N.C. Superfund Section

RE: Southern Wood Piedmont Gulf Site (NCD 053 488 557)
Teleconference with Mr. William Arrants, Southern
Wood Piedmont

On the above date I spoke with Mr. William Arrants, Environmental Compliance and Safety Manager, 803/599-1075. He had returned my call from Tennessee after receiving my message. Mr. Arrants was aware that a consultant had done considerable work for the company, but recommended that I contact Mr. Chuck Davis for details.

PMMGRID

STATE N.C. PUBLIC WATER SUPPLY SYSTEM

10/12/93

ACTIVE SYSTEMS

GRID LATITUDE: 353000 / 353730, LONGITUDE: 0791200 / 0792130

PWS ID	SYSTEM NAME	TYPE	POPULATION	RES.PERSON WORK PHONE	SOURCE NAME	SOURCE TYPE	SOURCE AVAIL.	LATITUDE	LONGITUDE
319025	GOLDSTON-GULF SANITARY DIST	C	1334	9198982239	DEEP RIVER	S	P	353331	791722
319040	ST LUKES WATER CORPORATION	C	200	9198984663	GOLDSTON-GULF SAN DIST	P	P	353331	791722
319407	BREWERS RESTAURANT	N	950	9198375511	WELL	G	P	353400	792000
353025	CUMNOCK COMMUNITY WATER SYSTEM	C	158	9197761424	GOLDSTON-GULF SAN DIST	P	P	353331	791722
353130	LEE COUNTY WTR TRTMT PLT	C	2418	9197751839	DEEP RIVER	S	P	353319	791436

Carroll

1115 HILLSBORO
RALEIGH, NC 27603
TEL. (919) 833-2079

JOURNAL
WINSTON-SALEM, N. C.

OCT 10 92

FILE COPY

File Southern Wood Ped

411 Trial of Waste Company's Owner Is Set to Start Monday

Bribery of federal judge alleged in charges involving Marine Shale

By Terry Martin
JOURNAL RALEIGH BUREAU

The owner of a hazardous-waste company that until recently was the largest recipient of toxic waste from North Carolina is set to go to court Monday on charges that he bribed a federal judge.

John M. "Jack" Kent, the owner and president of Marine Shale Processors Inc. of Amelia, La., is scheduled to be

tried in U.S. District Court in Shreveport, La.

Kent is accused with two co-defendants of promising \$2 million to Judge Richard Haik of U.S. District Court in Louisiana in exchange for Haik's rendering a favorable ruling in a \$50-million civil suit. The suit, which is still pending, was brought by federal environmental officials and accuses the company of hazardous-waste violations.

The company, which has been under fire from regulators and environmental groups since 1986 over its use of hazardous waste in construction material, accepted 73.8 million pounds of waste

from North Carolina in 1990, the last year for which complete records are available.

Records at the N.C. Division of Solid Waste Management show that most of that waste, 73 million pounds of contaminated dirt, came from a Superfund cleanup of a former dump site in Chatham County owned by Southern Wood Piedmont Inc. of Gulf, N.C.

That project, authorized by the U.S. Environmental Protection Agency, accounted for 76 percent of the hazardous waste removed from cleanups in North Carolina in 1990 and 40 percent of all hazardous waste shipped out of the state

that year, records show. Shortly after those waste shipments, EPA barred Marine Shale from entering into contracts with the government and stated in a notice of its action: "The government cannot continue to do business with a company so dishonest that it would turn the hazardous waste of federal agencies into a menace to public health."

The effects of the pending litigation on future waste shipments from North Carolina is unclear, state officials say.

Linda W. Little, the executive director of the Governor's Waste Management

See WASTE, Page 24

WASTE

Continued From Page 19

Board, said: "Louisiana has been trying to shut that place down for years. I don't know what effect it may have for us."

Michael A. Kelly, the deputy director of the N.C. Division of Solid Waste Management, which regulates hazardous-waste plants, said, "I don't think it will have any major impact on waste that is generated, but it could on cleanup sites because it has been a relatively inexpensive way to dispose of waste."

But Kelly said he has advised companies in North Carolina against relying on Marine Shale for waste disposal.

Marine Shale, much like Carolina Solite Corp. of Stanly County, has benefited for years from an exclusion to federal hazardous-waste incineration regulations for companies that use hazardous-waste to manufacture aggregate, a concrete-like construction material.

Richard C. Fortuna is the executive director of the Hazardous

WASTE SHIPMENTS

Quantities of hazardous waste shipped to Marine Shale Processors from North Carolina:

Year	Total Pounds
1987	4,961,811
1988	2,139,485
1989	1,390,253
1990	73,833,371
1991	N/A

Source: N.C. Div. of Solid Waste Management

Waste Treatment Council, a trade organization of 65 waste industries that has been critical of both companies.

He said that Kent's trial demonstrates why rigid environmental regulations should be enforced as rigidly against waste burners who ask for exemptions as against hazardous-waste incinerators.

"If Marine Shale Processing can exempt itself from federal environmental laws by claiming that its incinerator ash is a product that

nobody buys, then every incinerator or waste burner in the country could make the same claim, effectively rendering our environmental laws moot," Fortuna said in a prepared statement.

The EPA closed many of those exclusions with new regulations in August 1991 and Carolina Solite, previously the largest burner of hazardous waste in North Carolina, is now installing \$2 million in new pollution equipment in its effort to return to using hazardous waste as a fuel.

Joseph A. Cage, the U.S. attorney for western Louisiana, said that the future of Marine Shale awaits the outcome of Kent's trial on charges of conspiracy, bribery and obstruction of justice. If convicted, Kent faces up to 15 years in prison and fines of up to \$6.5 million.

Cage said, "I don't know what effect it will have on the company, but if Kent's convicted, he won't be around to do it anymore."

But Robert Habans, an attorney for Kent, said yesterday: "Mr. Kent is an innocent man. He shouldn't even be in court with those scoundrels (his co-defendants)."

file: Southern Wood Piedmont - 41f
MD 053 488 557

HAZARDOUS WASTE TREATMENT COUNCIL



915 15th Street, N.W.
Fifth Floor
Washington, D.C. 20005
Tel. (202) 783-0870
Fax (202) 737-2038

FOR IMMEDIATE RELEASE



Contact: Richard C. Fortuna
202/783-0870

**MARINE SHALE PROCESSORS' (MSP) OWNER JACK KENT
INDICTED FOR ATTEMPTED BRIBERY OF FEDERAL JUDGE**

(August 12, 1992) A Federal Grand Jury today returned an indictment against Jack Kent and two associates for attempting to "knowingly, intentionally and corruptly obstruct and impede the due administration of justice in the case of United States v. Marine Shale Processors, 90-1240, in the U.S. District Court for the Western District of Louisiana, in that said defendants did offer and cause to be offered to U.S. District Court Judge Richard Haik a bribe of two million dollars in an effort to influence him in the performance of his official duties as the presiding judge in the above described civil case, all in violation of Title 18, U.S.C.," (pp. 6-7 of the indictment). In the pending case, the Federal government is seeking as much as \$50 million in fines from MSP for polluting the adjoining bayou and for engaging in sham recycling by illegally burning, storing and disposing of hazardous waste without a permit.

While MSP pled guilty to criminal violations of Federal water pollution laws in 1989, the facility has continued to operate despite 6 years of litigation over the legality of its hazardous waste operations. MSP has maintained that it is exempt from Federal laws governing hazardous waste incineration, claiming that it is a manufacturer of "aggregate," even though virtually all the material being fed to and burned in its rotary kiln unit is Federally-defined hazardous waste. The underlying Federal suit challenges these claims in light of the fact that the "aggregate" has failed numerous toxicity tests for heavy metal leaching, little if any of the "aggregate" has ever been sold, and virtually all of the facility's revenues are derived from burning of hazardous waste. If MSP can exempt itself from Federal environmental law by claiming that its incinerator ash is a product (i.e., aggregate) that nobody buys, then every incinerator or waste burner in the country could make the same claim, effectively rendering our environmental laws moot.

"Indicting Jack Kent on bribery charges is like nailing Al Capone for income tax evasion, but this latter day outlaw has only begun to pay for his environmental crimes. Mr. Kent has provided two million reasons why his sleazy operation should have been shut down years ago," stated Richard C. Fortuna, Executive Director of the Hazardous Waste Treatment Council, the industry group that first brought MSP's illegal activities to the government's attention in July, 1986. "A criminal like Jack Kent has no place in our society, nor in our industry. While Mr. Kent has attempted to portray himself as an

(more)

innovator struggling against entrenched interests; this brazen act reveals beyond the shadow of a doubt that he is a charlatan's charlatan deserving of punishment under the full weight of the law. Rather than using his money to comply with the law, this outlaw attempts to bribe a Federal judge in the hopes of evading it. I trust that this development will provide added impetus to the government's prosecution of this sham recycling operation. The Justice Department cannot allow the trial dates to slip or have its resolve compromised by these events. To do otherwise, the Justice Department will effectively allow MSP's ill-gotten gains and continued illegal operation to coin the currency for Mr. Kent's fines and penalties, and in turn fail to deter others who are seeking to emulate this exemption enterprise. A message must be sent, that 'environmental crimes do not pay,'" Mr. Fortuna added.

FEDERAL DEBARMENT

In December, 1991 MSP was barred from participating in Federal contracts or doing any business with Federal Agencies for a period of 3 years. In the words of the July 10, 1990 Debarment Notice:

Based on the above referenced convictions and the history behind them, the government cannot continue to do business with a company so dishonest that it would turn the hazardous wastes of federal agencies into a menace to the public health. Continuing to do business with MSP now that their business practices are known would place the EPA in the position of being an accessory to the creation of the very dangers it labors so hard to prevent. (Paragraph 13)

If Jack Kent was willing to risk personal imprisonment by bribing a Federal judge, one can only imagine the risks he would take and the laws he would break when entrusted with the wastes of others.

The Hazardous Waste Treatment Council is a non-profit national association of high-tech firms committed to stringent control and proper management of hazardous waste. The Treatment Council was the principal industry supporter of reforms to the nation's hazardous waste management and cleanup laws. It is the largest association of waste treatment firms and equipment manufacturers representing 65 firms with facilities in 49 states. Copies of the indictment are available from the HWTC.



Site Name: Southern Wood Piedmont
Site Number: NCD 053 488 557

Site Location: Gulf, N.C.
Chatham County
Latitude: 35 33 37.5
Longitude: 79 16 38.0

Date: July 06, 1992

Calculation Results

Distance from Site Location	Population		Number of Households	
	Per Ring	Cumulative	Per Ring	Cumulative
0 to 1/4 mile	27	27	9	9
>1/4 to 1/2 mile	60	87	24	33
>1/2 to 1 mile	103	190	39	72
>1 to 2 miles	227	417	93	165
>2 to 3 miles	464	881	184	349
>3 to 4 miles	1,052	1,933	399	748

Note: The populations and number of households within specified target distance rings were calculated for the NC Superfund Section by the NC State Center for Geographic Information and Analysis using the 1990 US Census data. These values were calculated by summing the population and the number of households data for each census block located within each target ring. For census blocks lying only partially within the ring, the per cent area of the block within the ring was multiplied by the population and household densities of the block.

LATITUDE AND LONGITUDE CALCULATION WORKSHEET #2
LI USING ENGINEER'S SCALE (1/60)

SITE NAME: SOUTHERN WOOD Piedmont CERCLIS #: NCD 053 488 557

AKA: N/A SSID: N/A

ADDRESS: 2139 State Rd

CITY: Gulf STATE: NC ZIP CODE: 27256

SITE REFERENCE POINT: ACTUAL SITE

USGS QUAD MAP NAME: Goldstone TOWNSHIP: N/S RANGE: E/W

SCALE: 1:24,000 MAP DATE: 1970 RVP01 SECTION: 1/4 1/4 1/4

MAP DATUM: (1927) 1983 (CIRCLE ONE) MERIDIAN:

COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 7.5' MAP (attach photocopy):

LONGITUDE: 79° 15' 00" LATITUDE: 35° 30' 00"

COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 2.5' GRID CELL:

LONGITUDE: 79° 15' 00" LATITUDE: 35° 32' 30"

CALCULATIONS: LATITUDE (7.5' QUADRANGLE MAP)

A) NUMBER OF RULER GRADUATIONS FROM LATITUDE GRID LINE TO SITE REF POINT: 204

B) MULTIPLY (A) BY 0.3304 TO CONVERT TO SECONDS:

$$A \times 0.3304 = \underline{67.40}''$$

C) EXPRESS IN MINUTES AND SECONDS (1' = 60''): 1° 07' 40"

D) ADD TO STARTING LATITUDE: 35° 32' 30.00" + 1° 07' 40" =

SITE LATITUDE: 35° 33' 37.5"

CALCULATIONS: LONGITUDE (7.5' QUADRANGLE MAP)

A) NUMBER OF RULER GRADUATIONS FROM RIGHT LONGITUDE LINE TO SITE REF POINT: 297

B) MULTIPLY (A) BY 0.3304 TO CONVERT TO SECONDS:

$$A \times 0.3304 = \underline{98.13}''$$

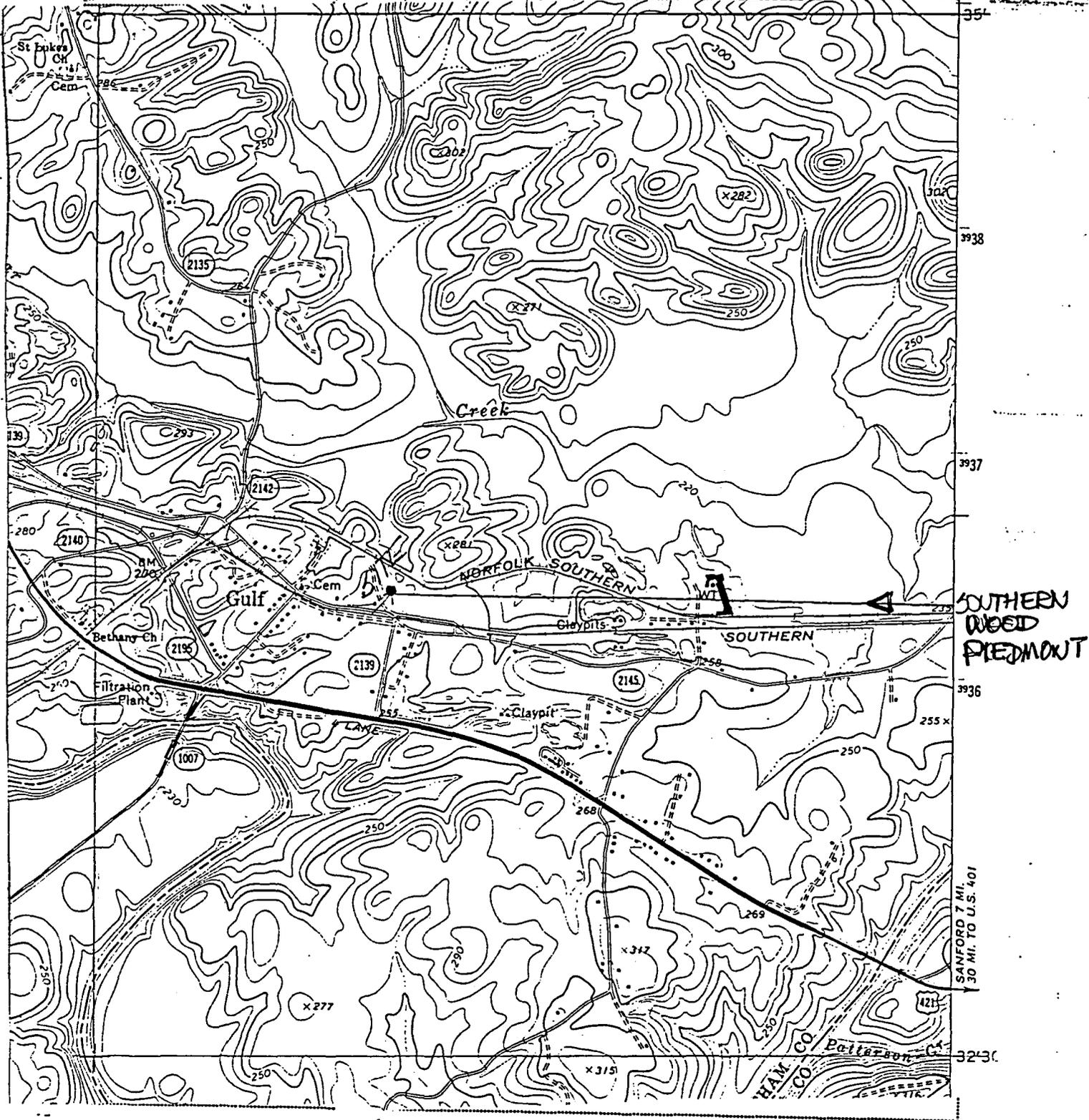
C) EXPRESS IN MINUTES AND SECONDS (1' = 60''): 1° 38' 13"

D) ADD TO STARTING LONGITUDE: 79° 15' 00.00" + 1° 38' 13" =

SITE LONGITUDE: 79° 16' 38.0"

INVESTIGATOR: Wally L Spores DATE: 4-15-92

SITE NAME: Southern Wood Piedmont NUMBER: NC0 053 400 557



TOPOGRAPHIC MAP QUADRANGLE NAME: GOLDSTONE NC

SCALE: 1:24,000

COORDINATES OF LOWER RIGHT-HAND CORNER OF 2.5-MINUTE GRID:

LATITUDE: 35 30 00 LONGITUDE: 79 15 00

10 January 1991

MEMORANDUM

TO: File

FROM: Charlotte Jesneck
Superfund Section

RE: Southern Wood Piedmont
Gulf, Chatham County
Site Cleanup

I telephoned Chuck Davis (803/599-1075) with Southern Wood Piedmont today to find out if the company was involved in a cleanup. Mr. Davis said that they recently excavated three dry ponds at the site and sent the waste to Marine Shale in Louisiana to be incinerated. Approximately 35,000 tons of waste was sent off-site for incineration. Mr. Davis said that, as he previously indicated in the meeting with our Division on 20 April 1990, his company was not interested in signing an Administrative Order on Consent. Mr. Davis added that he will submit the information on the cleanup and on the ongoing site assessment being conducted by Geraghty and Miller after all the data is compiled.

CJ/acr

8 June 1990

TO: Lee Crosby
FROM: Pat DeRosa *PD*
RE: Southern Wood Piedmont
NCD053488557
Moncure, Chatham County, North Carolina

I attended an informal meeting today with Bill Meyer and Jerry Rhodes to talk with Tom Darden, Cherokee-Sanford Group, Inc., and Harold Bynum, Attorney, representing Cherokee-Sanford Group, Inc. We discussed the issue proposed earlier by Tom Darden regarding the use of soil from the subject site in brick manufacture at an off-site facility. Mr. Darden indicated that Southern Wood Piedmont is conducting sampling at the site and plans to remove "visual contamination". Mr. Darden would like to use only the remaining soils which have low or no contaminants for brick manufacture.

To date, we have not received any sampling results from Southern Wood Piedmont documenting the concentration of contaminants in the soil. At an earlier meeting, Southern Wood Piedmont indicated they were conducting a site assessment, however, they did not want to submit a plan for prior State approval or review. They planned to remove visual contamination (which they contend is not classified as a RCRA hazardous waste) and take it to the Marine Shale facility in Louisiana. Southern Wood Piedmont did not indicate what they intend to do with the remainder of the contaminated material. Geraghty and Miller is working with Southern Wood Piedmont to characterize the site.

Bill Meyer asked Tom Darden to submit any data he might have regarding the levels of contaminants in the soil and the process they intend to use to manufacture the bricks. Bill indicated that the State Inactive Sites program could work with Cherokee and Southern Wood Piedmont on this site.

PD/ds/s-wood/doc.4

cc: Charlotte Jesneck

S. H. W. W. G. Piedmont
NCD05348

J. 20



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

May 24, 1990

Mr. Harold Bynum
Smith, Helms, Mulliss & Moore
Attorneys At Law
P. O. Box 21927
Greensboro, N. C. 27420

Dear Harold:

Enclosed are three documents concerning the proposed utilization of contaminated clay from Southern Wood Piedmont by Cherokee Sanford Group, Inc. for manufacturing brick.

As you are aware the Division is committed to supporting reasonable technical solutions to cleaning up sites such as Southern Wood Piedmont. The proposal offers a direct solution to an existing contamination problem; however, I do not think the proposal is acceptable from a hazardous waste regulatory prospective since the hazardous constituents are not usual, normal or substitute ingredients for brick manufacturing. The Superfund Section has identified other issues that may be of concern to Southern and Cherokee. The Division's comments to you on this project is not intended to be a final decision; therefore, if we need to meet to address the response by the Division staff, please let me know.

Respectfully,

William L. Meyer

WLM:ss

Enclosures: May 21, 1990 memorandum: Proposed recycling of contaminated clays by Cherokee Sanford Group, Inc.
March 26, 1990 memorandum: Southern Wood Piedmont Company
June 28, 1989 letter: Central Transport Inc.

cc: Jerry Rhodes
Lee Crosby



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

May 21, 1990

MEMORANDUM

TO: William L. Meyer, Director *WLM*
Solid Waste Management Division

THROUGH: Jerome H. Rhodes, Chief *JHR*
Hazardous Waste Section

FROM: Doug Holyfield, *DH* Head
Waste Management Branch

RE: Proposed Recycling of Contaminated Clays by
Cherokee Sanford Group, Inc.

In response to the letter dated March 9, 1990 from Mr. Thomas Darden and a subsequent letter dated April 17, 1990 from Mr. Harold Bynum, this office has reviewed the proposal and concludes that this activity is not recycling. This conclusion is based on the following factors:

40 CFR 261.2(e) exemption requires proof that materials being recycled are (1) used or reused as ingredients in an industrial process to make a product, (2) used or reused as effective substitutes for commercial products, or (3) returned to the original process from which they are generated, where the material must be returned as a substitute for raw material feedstock.

Based on the submittals, this office cannot determine that the use of contaminated soils containing hazardous constituents (pentachlorophenol, creosote, and CCA), is an active ingredient, effective substitute, or original feedstock in the manufacture of bricks. In addition, EPA - Region IV personnel indicated that this exemption would require such a demonstration for each constituent.

It is our understanding that the contaminated site of concern, (Southern Wood Piedmont) has claimed that the organic waste is not hazardous waste. If wastewater treatment did not occur, it is not K001 bottom sediment sludge from the treatment of wastewater. However, it could be argued that treatment has taken place upon being land applied or upon settling in lagoons. Whether or not this is listed waste, the submittals note that chromated copper arsenate (CCA) has been used on the site, therefore characteristic hazardous waste may be present. Testing will be required for a determination. By removing this waste, Southern Wood Piedmont would be a generator of hazardous waste requiring that the waste be managed and disposed of as a hazardous waste at a permitted or interim status facility. Cherokee Sanford would therefore be managing a hazardous waste without a permit for storage or treatment and the potential of hazardous waste emissions including volatile organics and toxic heavy metals could be significant. In addition the site would not have been subject to the siting and review criteria for establishing a hazardous waste facility.

If it can be demonstrated that non-hazardous waste is being proposed to be utilized by Cherokee Sanford, the clay could perhaps be used with approval by the Air Quality Section of the Division of Environmental Management coordinating acceptable waste types, volume and feed rates. In conclusion, I have attached prior correspondence that describes similar conclusions and a memorandum addressing concerns behind disturbing a CERCLA site.

attachments:

00253



North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

June 28, 1989

Glen Simpson, Environmental Director
Central Transport, Inc.
P.O. Box 7007
High Point, North Carolina 27264

Dear Mr.. Simpson:

Judy Lund, Jerry Rhodes, and I have discussed the specifics of your proposal to use your wash water from tank truck cleaning operations in the manufacture of bricks. Judy Lund's letter to you dated December 12, 1989, is correct in its conclusions that recycled materials may be exempted from regulation as solid waste under 40 CFR 261.2(e)(1). However, based upon a fuller understanding of your washing operations and this particular enterprise, the Branch has reconsidered its position on this recycling venture.

The Branch raises two points of contention with your recycling proposal. The first concerns whether your proposal is exempted under 40 CFR 261.2(e)(1). Further citations, as discussed below, explain what materials do not qualify for the exemption.

40 CFR 261.2(e)(2), codified at 10 NCAC 10F .0029, states that the following materials are solid wastes, even if the recycling involves use, reuse, or return to the original process (described in paragraphs (e)(1)(i)-(iii) of this section):

- (i) Materials used in a manner constituting disposal, or used to produced products that are applied to the land.

Since bricks come in contact with the ground, their use is one which constitutes disposal. Consequently, bricks manufactured using water containing a listed hazardous waste would be hazardous waste when their use puts them in contact with the ground. In addition, characteristic hazardous waste would also be subject to regulation in the manufacturing process until such time as it no longer displays the characteristic for which it is hazardous.

40 CFR 261.2(f), codified at 10 NCAC 10F .0029, states in part that respondents in actions to enforce regulations implementing Subtitle C of RCRA who raise a claim that a certain material is not a solid waste, or is conditionally exempt from regulation, must demonstrate that there is a known market or disposition for the material, and that they meet the terms of the exclusion or exemption. In doing so, they must provide appropriate documentation to demonstrate that the material is not a waste, or is exempt from regulation.

Since Central Transport Incorporated must pay Cunningham Brick Company to take its waste water, it is apparent that the waste water has no value without the payment. Consequently there is no market for the water as required by 40 CFR 261.2(f).

After considering your proposal in relation to 40 CFR 261.2(e)(2), and 40 CFR 261.2(f), the Branch does not believe that your wash water used in the manufacture of bricks is exempted from regulation as a hazardous waste.

The second concern that the Branch has about this endeavor is the use of 40 CFR 261.7 to classify your tank trucks as empty and not regulatable. As stated in previous correspondence to you, the Branch does not believe that Central Transport Incorporated can establish adequate controls to exclude any free product which might be left in the tank. Any amount of product listed in 40 CFR 261.33, which might be removed by reasonable means would cause wash water to become a listed hazardous waste. And as explained above, bricks made from this water would also be hazardous waste.

Based upon the foregoing, the Branch cannot endorse Central Transport Incorporated's use of its wash water in the manufacture of bricks.

If you have any questions concerning this matter, please contact me at (919) 733-2178.

Respectfully,

Mack Henderson

Mack Henderson, Enforcement Program Supervisor
Hazardous Waste Branch
Solid Waste Management Section

cc Judy Lund ✓
Jerry Rhodes

26 March 1990

TO: Doug Holyfield
FROM: Pat DeRosa *PD*
RE: Southern Wood Piedmont Company
Gulf, NC, Chatham County
NCD053488557

Last week Margaret Babb brought the attached letter to my attention. I spoke with Lee about it and she indicated that she had not spoken with Mr. Darden. It seems that Mr. Darden is aware that this site is listed on CERCLIS and that the site is contaminated with wood preserving chemicals. I presume that he has discussed his proposal with Southern Wood Piedmont Company.

Regarding the site's status on CERCLIS, I have some additional concerns about Mr. Darden's Plan:

1. Disturbing contaminated areas on this site may make Mr. Darden's company a potential responsible party subject to CERCLA and the State Inactive Sites Program.
2. Currently we have no information that a remedial investigation has been conducted at the site or that the vertical and horizontal extent of contamination at this site has been fully characterized. The proposed activities may enhance the migration of hazardous substances from the site via groundwater, surface water, and air pathways. The activities may actually increase the hazards posed by this site. The proposed activities may constitute a remedial action at a CERCLA site and should be coordinated with the Superfund Section.
3. Even if the proposed actions are coordinated with the State, the companies involved may still be subject to further action by EPA under CERCLA (should the site be listed on the National Priorities List).

Please let us know if Mr. Darden provides any additional information regarding his proposed activities.

PD/pb/southwoo.pd

Attachment

cc: Lee Crosby

SMITH HELMS MULLISS & MOORE

ATTORNEYS AT LAW

GREENSBORO, NORTH CAROLINA

CHARLOTTE OFFICE
MAILING ADDRESS
POST OFFICE BOX 31247
CHARLOTTE, N. C. 28231

STREET ADDRESS
227 NORTH TRYON STREET
CHARLOTTE, N. C. 28202

TELEPHONE 704/343-2000
TELECOPIER 704/334-8487
TELEX 872460

TAMPA OFFICE
MAILING ADDRESS
POST OFFICE BOX 1842
TAMPA, FLORIDA 33601

STREET ADDRESS
2800 NCNB PLAZA
400 NORTH ASHLEY DRIVE
201 EAST KENNEDY BLVD.
TAMPA, FLORIDA 33602

TELEPHONE 813/229-1993
TELECOPIER 813/229-8535

MAILING ADDRESS
POST OFFICE BOX 21927
GREENSBORO, N. C. 27420

STREET ADDRESS
SUITE 1400
300 NORTH GREENE STREET
GREENSBORO, N. C. 27401

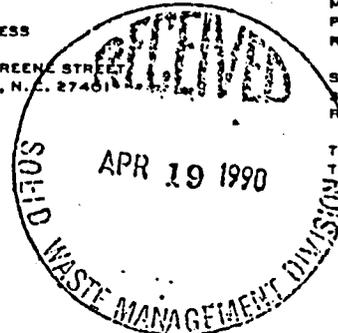
TELEPHONE 919/378-5200
TELECOPIER 919/379-9558

April 17, 1990

RALEIGH OFFICE
MAILING ADDRESS
POST OFFICE BOX 27525
RALEIGH, N. C. 27611

STREET ADDRESS
216 WEST EDENTON STREET
RALEIGH, N. C. 27603

TELEPHONE 919/828-8207
TELECOPIER 919/828-7938



WRITER'S DIRECT DIAL

(919) 378 5285

Mr. William L. Meyer, Director
Solid Waste Management Division
Department of Environment, Health and
Natural Resources
State of North Carolina
Post Office Box 27687
Raleigh, North Carolina 27611-7867

Re: Cherokee Sanford Group, Inc.
Chatham County, North Carolina

Dear Mr. Meyer:

Our firm represents Cherokee Sanford Group, Inc. (Cherokee), a North Carolina company engaged in the brick-making business. Cherokee owns and operates clay pits and a brick manufacturing facility in Chatham County near Sanford, North Carolina.

Southern Wood Piedmont Company (Southern) owns property in Chatham County adjacent to the Cherokee facility. We are informed that the Southern property has been contaminated by releases of wood-treating chemicals including creosote, pentachlorophenol and some volatile organic chemicals. Cherokee is considering the possibility of using the contaminated clay from the Southern property to make bricks.

From the limited records we have seen regarding the Southern site, it appears that Southern began using its property in 1946 for the operation of wood-preserving processes. It used creosote, pentachlorophenol and chromated copper arsenate as preservatives in this operation, and may have also used some organic solvents. Apparently, sludge wasted from pressure-treatment vessels was pumped into settling lagoons on the property. After some settlement of the contaminants had occurred, the wastewater was pumped from the lagoons and sprayed on portions of the property. In 1980, Southern closed its facility, sprayed the remaining wastewater onto the property,

Mr. William L. Meyer
April 17, 1990
Page 2

covered the lagoons, regraded the property and planted grass seed.

In 1983, EPA inspected the Southern property as part of its national program to rank contaminated sites under CERCLA. EPA officials collected soil samples from the lagoons, drainage ditches and process areas. Most of the samples were contaminated by creosote constituents, pentachlorophenol and some volatile organic chemicals. As a result of the inspection, the site has been listed on the state inventory of contaminated sites, but EPA has not placed it on the National Priority List. Because state and federal regulators have focused on more pressing environmental concerns, little has occurred at the site since 1983.

Cherokee intends to use the contaminated clay from the Southern property as an ingredient in the manufacture of bricks. The bricks will then be marketed by Cherokee subject to its normal quality standards. Cherokee and Southern have had preliminary discussions and both parties are excited about the desirability of the project in an environmental sense. Since the contaminated clay will be used as an ingredient in an industrial process to make a commercial product, we are of the opinion that the material is exempt from regulation under the Resource Conservation and Recovery Act pursuant to the provisions of 40 CFR §261.2(e):

(e) Materials that are not solid wastes when recycled.
Materials are not solid wastes when they can be shown to be recycled by being:

(i) Used or reused as ingredients in an industrial process to make a product, provided the materials are not being reclaimed; or

(ii) used or reused as effective substitutes for commercial products.

It is anticipated that the material would be transported the short distance from the Southern property to the Cherokee facility by an independent transporter. Once on the Cherokee property, the material would be managed under roof using procedures designed to prevent the release of any contaminated clay to the environment. The material will be introduced into the manufacturing process soon after it is delivered to Cherokee and therefore will not be accumulated speculatively as defined in 40 CFR §261.1(c)(8). To the extent that any management

Mr. William L. Meyer
April 17, 1990
Page 3

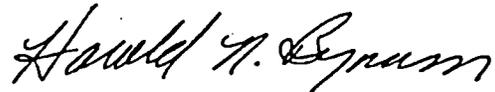
procedures are covered by the provisions of the Clean Water Act or corresponding State laws, Cherokee will obtain all required approvals from the Division of Environmental Management. Since the material will be exposed to very high temperatures in the brick making process, some of the contaminants will be driven off and exhausted to the atmosphere. Consequently, Cherokee intends to submit the details of this project to the Air Quality Section of the Division of Environmental Management for appropriate approvals or permit modifications.

Cherokee is convinced that this project will produce very positive environmental benefits and is ready and anxious to proceed. Would you please consider this proposed project and particularly the application of 40 CFR §261.2(e) as outlined above. As soon as is feasible, we would appreciate very much a letter from you indicating the extent to which you concur with our interpretation of the Hazardous Waste Rules, and expressing your approval for Cherokee to proceed with the project.

Thank you for your attention to this matter.

Very truly yours,

SMITH HELMS MULLISS & MOORE



Harold N. Bynum

HNB/sw

cc: Mr. Thomas F. Darden, II
Mr. Thomas C. Watkins

April 4, 1990

TO: Lee
FROM: Pat DeRosa PD
RE: Southern Wood Piedmont
Gulf, NC
NCD05348857

On April 3, 1990, I spoke with Jerry Rhodes, regarding Tom Darden's proposal to use contaminated soil from the subject site for brick manufacture. Jerry said that Mr. Darden had not called him back about the proposal. I told Jerry that Lee and I had had a conference call with Mr. Darden and expressed our concerns about his proposal. Mr. Darden said he would speak with Victoria Voight and would come by to look at our files regarding this site. Jerry and I agreed to keep each other informed if we heard anything else about this proposal.

PD/ds/s-wood/3



Cherokee Sanford Group, Inc.

RECEIVED

MAR 13 1990

SUPERFUND SECTION

March 9, 1990

Lee Crosby
Superfund Section
Division of Solid Waste Management
Department of Natural Resources and Community Development
P.O. Box 27687
Raleigh, NC 27611

Dear Lee:

I spoke with Jerry Rhodes of the Hazardous Waste Section and he suggested I talk with you regarding a Superfund site near Gulf. The site is owned by Southern Wood Piedmont Company and is contaminated with wood preserving chemicals. I called you this morning but missed you. I wanted to write to you to explain the reason for my call.

I had the opportunity to meet with Bill Cobey and Ernest Carl about a month ago. One of the items we discussed was this site. At that time, I expressed my interest in mining clay at the site, realizing that it is a contaminated site. We would have two objectives in so doing. First, we need clay, and second, we could clean up the site.

We would like to explore the possibility of recycling the soil by mining it and using it in our brick-making process. We currently mine different clay and then mix them to make a good blend for brickmaking. We have four plants in the area where the soil could be used, including a plant in Gulf. The soil would be combined with "clean" soil mined at our other pits in concentrations varying from 1% to 75%. We would have control over the level of contaminated soil used. The concentration would depend on the nature of the clay and on any regulatory constraints which might apply to its use. The soils would be blended, formed into bricks, and heated in a kiln to temperatures of approximately 2000 degrees Fahrenheit for several hours.

Please call me at your convenience to let me know what you think about this idea and what next steps we need to take. Thank you.

Sincerely,

Tom Darden
Thomas F. Darden /rth.
Chief Executive Officer

February 19, 1988

TO: Lee Crosby

FROM: Pat DeRosa 

RE: Kaiser Fertilizer Plant, NCD980842470
Plymouth Wood Treatment, NCD075570820
Southern Wood Piedmont, NCD053488557
Superior Products Company, NCD024600579

On February 12 and 16, 1988, I spoke by telephone with Susan Deihl, EPA Region IV (404) 347-2234 regarding the subject sites. I told her that according to our records, EPA or EPA contractors had begun or completed Site Investigations at these sites. I asked her how she wanted us to proceed. She said we should send her a letter requesting to delete these sites from the workplan and propose 4 substitute sites.

PD/ds/0543b-15

January 21, 1988

TO: File

FROM: Pat DeRosa *PD*

RE: Southern Wood Piedmont
NCD053488557

I spoke by telephone today with Bob Holman, Water Quality Planning, DEM, 733-5083, to find out whether the proposed industrial water supply intake had indeed been sited downstream of the subject site. Mr. Holman said that the intake location had been changed and was now sited upstream of the facility near the Southern RR bridge.

PD/ds/0526b-62



North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

24 November 1987

Mr. Bob Holman
NC Dept. of NRCD-DEM
Water Quality Planning
PO Box 27687
Raleigh, NC 27611

Dear Bob:

RE: Southern Wood Piedmont Company
NCD 053 488 557

In response to your questions about the impact of this facility on the proposed downstream water intake, I have reviewed our files and talked with USEPA about past waste handling practices and about closure actions at Southern Wood Piedmont. The facility began operations in 1946 as a wood preserving plant using creosote, pentachlorophenol, and chromated copper arsenate. The wastes were handled by an 8000 GPD non-discharge type waste water treatment facility which included storage-settling ponds, aeration lagoons, and a spray irrigation area (NC DEM Permit No. 3931). In 1980 the facility was closed by dismantling the plant, by evaporating the liquids remaining in the lagoons by increased spray irrigation (NC DEM Permit No. 3931-R), and by regrading and seeding the land. In 1981 the company filed a Notification of Hazardous Waste Site (CERCLA 103(C)) with USEPA.

In September 1983 the site was investigated by a Field Investigation Team (FIT) from USEPA. They sampled soil from the old lagoon areas and from the drainage ditch that carries run-off into Cedar Creek. They also sampled Cedar Creek sediment upstream and downstream of the confluence of the drainage ditch and Cedar Creek, sediment at the confluence, and sediment from the floodplain upstream of the confluence. Their sample analyses show plainly that contamination from wood treating chemicals exists in the soil in the old lagoon areas and along the drainage ditch. However, the data do not clearly show that stream sediment in Cedar Creek is contaminated with chemicals that originated at the wood treating site.

I contacted Ms. Giezelle Bennett of USEPA, Region IV, (404) 347-3402, who told me that the site achieved a Hazard Ranking System (HRS) score of 15.57 based on data gathered by the USEPA FIT. This score is insufficient to warrant the site's inclusion on the National Priorities List (NPL), and

Mr. Bob Holman
11-24-87
Page 2

presently, USEPA is taking no remedial action there. In the future some clean-up may be directed by either USEPA or by the state agency responsible for old hazardous waste sites, particularly since the new intake is just under three stream miles downstream of the site.

In summary, the FIT data show contamination by extractable organic compounds in the soil of the site and in the sediment of Cedar Creek. These contaminants are within three miles upstream of the proposed intake. It may be prudent to move the intake upstream of the confluence of Cedar Creek and the Deep River and therefore upstream of any contamination that could come from the Souther Wood Piedmont facility.

I have included copies of appropriate parts of our file. If you have any questions, please call me at 733-2801 or Ms. Giezelle Bennett at (404) 347-3402.

Sincerely,



Grover Nicholson, Geologist
CERCLA Unit
Solid and Hazardous Waste Management Branch
Environmental Health Section

GN/ds/0400b/67-68

November 5, 1987

TO: File

FROM: Grover Nicholson *Grover Nicholson*

RE: Southern Wood Piedmont Company

Today I spoke with Bob Holman of NC DEM-Water Quality Planning, 733-5083. There is a public hearing on 15 December 1987 for permitting an industrial water supply intake in the Deep River near Gulf, NC. A question has been raised about the wisdom of locating an intake downstream from Southern Wood Piedmont Company, a closed wood preserving operation. The proposed intake location will be 1000 feet downstream of SR 1400 (Lee County) or SR 2153 (Chatham County).

Bob wants our opinion as to the hazard posed by Southern Wood Piedmont and wants to know if EPA is planning a clean-up.

GN/ds/0526b-8

Submitted
by Charles
Dom
6/2/88

RECEIVED

P. O. Box 5447
Spartanburg, S. C. 29304

OCT 20 1987

Phone 803/576-7660

RALEIGH REGIONAL OFFICE



Southern Wood Piedmont Company

October 16, 1987

North Carolina Division of Env. Management
Attn: Jay Zimmerman
3800 Baret Drive
Raleigh, N. C. 27611

Dear Mr. Zimmerman:

Attached are the boring logs and maps prepared by Patterson Exploration Services on our Gulf property.

If, after receiving these you have any questions, please call at 803-576-7660.

Sincerely,

Michael D. Pruett, Manager
Environmental & Capital Projects

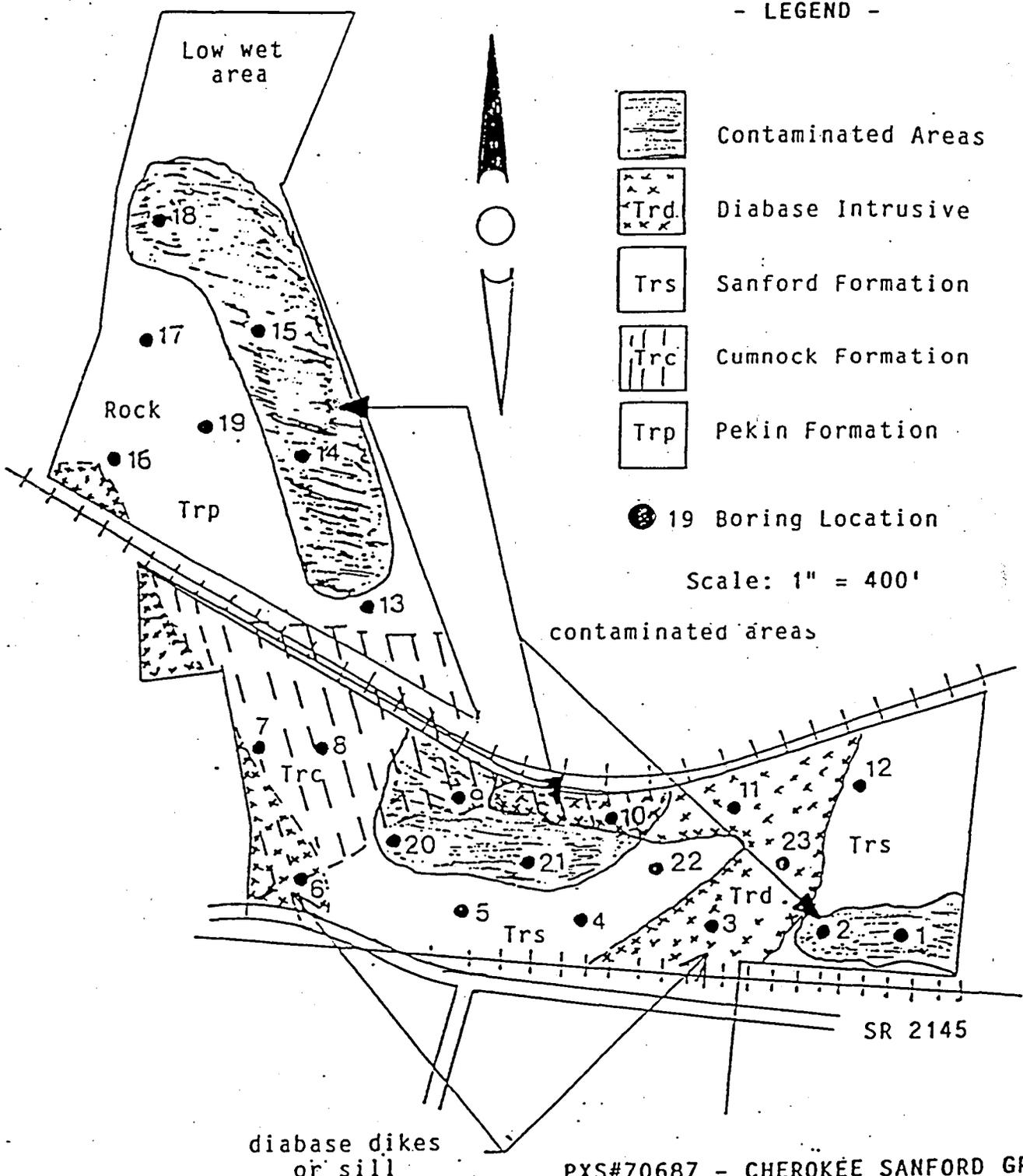
CC: R. H. Watts w/attachments
E. F. Button w/attachments
E. L. Gibbs w/attachments

224bw

6-2-88

Charles
Oldham

919-775-5031
2205 Southern Rd.
Sawford, N.C. 27330



- LEGEND -

- Contaminated Areas
- Trd Diabase Intrusive
- Trs Sanford Formation
- Trc Cumnock Formation
- Trp Pekin Formation

● 19 Boring Location

Scale: 1" = 400'

contaminated areas

SR 2145

diabase dikes
or sill

PXS#70687 - CHEROKEE SANFORD GROUP

Southern Wood Piedmont
Gulf, NC Property
August 1987



**PATTERSON
EXPLORATION SERVICES**

P. O. BOX 1473 - SANFORD, N. C. 27330 - (919) 776-8111

BORING LOGS - PXS# 70687

Hole # B-1

0 - 1'	Gravel
1 - 6'	Fill - <u>Light creosote odor</u>
6 - 18'	Firm tan sandy siltstone, rotten
18 - 22'	Red "greasy" shale
22 - 24'	Rock - hard siltstone

Bag 6-24'

#B-2

0 - 6'	0-1 Gravel, 1-6 wood shavings, dark brown silty clay, fill - <u>strong creosote odor</u> .
6 - 16'	Red siltstone, firm to hard
16 - 20'	Brown siltstone, sandy - Rock

Bag 16-20'

#B-3

0 - 1'	Crusher run
1 - 8'	Diabase dike

NST

#B-4

0 - 1'	Gravel, sandy
1 - 8'	Mottled brown, yellow, orange clay silt Bag 1-8'
8 - 30'	Red rotten siltstone "crunchy", O.K. Fair Bag 8-30'
26-30'	Shale - "Greasy"

#B-5

0 - 1'	Crusher run
1 - 4'	Damp plastic silty clay - yellow orange
4 - 14'	Light reddish brown shale "Greasy" - Good
14 - 21'	Red shale - silty Good - "Greasy"
21 - 24'	Firm "Greasy" silty shale
24 - 30'	Soft to firm purple shale - Wet

Bag 4-30'

#B-6

0 - 5' Brown silty clay
6 - 10' Brown very moist clayey silt
10 - 17' Brown wet clayey silt
17 - 19' Diabase rock

#B-7

0 - 3' Brown clayey silt
3 - 4' Black silty clay
4 - 5' Black rotten shale
5 - 6' Tan silty clay
6 - 11' Light gray clay
11 - 16' Brown silt
16 - 29' Wet gray clayey silt

#B-8

0 - 1"
1" - 3' Brown clayey silt
3 - 7' Brown clay
7 - 9' Brown clayey silt
9 - 12' Brown clayey silt
12 - 14' Siltstone
14 - 26' Brown clayey silt, wet at 21'
26 - 29' Black shale

#B-9

0 - 10' Fill, old pond - strong creosote
10 - 17' Fill - silts and clays
17 - 26' Siltstone - red brown strong to moderate
creosote odor

#B-10 Edge of ponds

0 - 3' Dark brown clay , slight "greasy", creosote
odor
3 - 14' Brown silt, creosote (moderate) odor
14 - 17' Diabase

#B-11

0 - 6" Gravel
6" - 10' Brown silt
10 - 12' Diabase - Refusal

#B-12

0 - 2" Gravel
2" - 10' Reddish brown "greasy" clay
10 - 20' Reddish brown "greasy" clay
20 - 29' Reddish brown silty slightly greasy clay

#B-13

0 - 8' Fill - Red silty greasy clay and large rock fragments
8 - 12' Dark brown silty clay - Moderate creosote odor
12 - 19' Brown silty (clayey) and siltstone
19' Faint to moderate creosote odor
EOB

#B-14

No gravel
0 - 6' Red silty clay, greasy - Creosote odor
6 - 11' Multicolored silty clays, Fill & creosote
11 - 17½' Red greasy clay, slight creosote odor

#B-15

0 - 1" Gravel
1" - 12' Fill - silts and clays - creosote - strong
Water at 10'
Strong creosote floating on water

No sample

#B-16

0 - 5' Reddish brown silty clay
5 - 6' Siltstone - refusal

Moved B-19 between ridges

0 - 9' Reddish brown clayey silt
9' Rock

#B-17

0 - 5' Reddish brown silty clay
5 - 5.8' Siltstone
5.8 - 11' Reddish brown clay
11 - 15' Reddish brown clayey silt
15 - 17' Reddish brown clay, some silt

#B-18

0 - 9' Fill, silts & clays, strong creosote,
Wet at 8.5'

#B-20

0 - 3'	Tan silt
3 - 5'	Tan - brown silty clay
5 - 8'	Tan - brown silt, creosote odor
8 - 16'	Siltstone - tan
16 - 17½'	Light gray silty clay
17½ - 19'	Siltstone - tan

#B-21

0 - 3"	Gravel
3" - 6'	Black silty clay, creosote odor
6 - 11'	Brown clay
11 - 22'	Brown silty clay, water at 21'
22 - 29'	Dark brown clayey silt

#B-22

0 - 6"	Gravel
6" - 9'	Bake zone silt
	8½' - 9' siltstone baked
	No sample

#B-23

0 - 6"	Gravel
6" - 9'	Black-brown silty clay
	Diabase (rotten)
	No sample



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365



SEP 13 1984

4AW-ER

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles A. Burdell,
Director Technical Services
Southern Wood Piedmont Co.
P.O. Box 5447
Spartanburg, S.C. 29304

Re: Southern Wood Piedmont
2139 State Road
Gulf, NC 27256

Dear Mr. Burdell:

The United States Environmental Protection Agency (EPA) is currently investigating the release of hazardous substances at the above referenced site. This action is being taken by EPA pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA).

Under the provisions of Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. 9604, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927, as amended by the Solid Waste Disposal Act Amendments of 1980, the Administrator of the Environmental Protection Agency has the authority to require any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes and substances to furnish information related to such wastes and substances. Pursuant to these statutory provisions, you are hereby requested to provide the following information:

1. The generic name and chemical character of the hazardous substances, as defined under Section 101(14) of CERCLA, that you disposed of at the site.
2. For each hazardous substance identified above, the total volume (in gallons for liquids and in cubic meters for solids) disposed of and the date or time period within which disposal occurred.

3. Any evidence of your company's efforts to clean-up the site.
4. Information on your company's plans to remove the present contamination from the site.

For the above information, please describe the types of records that were maintained by your company, including the date of the records, the author of the records, the current location of the records and the current custodian and all efforts that were taken to identify these records. Pursuant to Section 103 of CERCLA, it is unlawful for any person knowingly to destroy, mutilate, erase, dispose of, conceal, or otherwise render unavailable or unreadable or falsify any records.

In addition to the above information, if you or your company is privately insured against releases of hazardous wastes and substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all insurance policies in effect during the period of activity in question.

Your answers to these questions must be sent to EPA within twenty (20) calendar days of your receipt of this letter. In addition, under Section 3008 of RCRA, 42 U.S.C. 6928, failure to comply with this request may result in an order requiring compliance as well as the assessment of penalties.

EPA regulations governing confidentiality of business information are set forth in Part 2, Subpart B of Title 40 of the Code of Federal Regulations. For any portion of the information submitted which is entitled to confidential treatment, a confidentiality claim may be asserted in accordance with 40 CFR Section 2.203(b). If EPA determines that the information so designated meets the criteria set forth in 40 CFR Section 2.200, the information will be disclosed only to the extent, and by means of the procedures specified in 40 CFR Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with response to this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice.

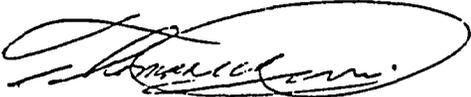
Your response should be sent to:

Ms. Giezelle S. Bennett
Investigation and Compliance Section
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, GA 30365

Due to the seriousness of the problem at this site and the attendant legal ramifications, the Agency strongly encourages you to submit a written response within the time frame specified herein. We hope that you will give these matters your immediate attention.

If you have any technical questions or would like to discuss this matter further, please contact Ms. Bennett at 404/881-2234.

Sincerely yours,



Thomas W. Devine, Director
Air and Waste Management Division

cc: Frank Moore
NC Solid & Hazardous Waste

C.A. Council
Vice President, Chief Operating Officer
Southern Wood Piedmont



Frank
Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

August 31, 1984

Mr. Charles Oldham
Route 12
P. O. Box 128
Sanford, N. C. 27330

RE: EPA Enforcement Policy
(Southern Wood Piedmont, Gulf)

Dear Mr. Oldham:

As we discussed on the telephone please find attached EPA's response to possible follow-up enforcement action at non-NPL CERCLA sites.

I look forward to hearing from you in the near future about a possible meeting on-site. If you have any questions, please contact me at (919) 733-2178.

Sincerely,

Frank E. Moore, Geologist

Solid & Hazardous Waste Management Branch
Environmental Health Section

FEM:jj
Attachments



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

August 14, 1984

*ST
File*

Ms. Giezelle Sutton
EPA Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30365

RE: Southern Wood Piedmont Site
Gulf, N. C.

Dear Ms. Sutton:

This office is in possession of the EPA report on the Southern Wood Piedmont facility sampling unit. I would like to know your interpretation of the reported data and what further actions will be taken with regards to this site.

Sincerely,

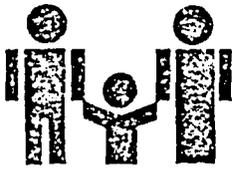
Frank E. Moore, Geologist

Solid & Hazardous Waste Management Branch
Environmental Health Section

FEM:jj

cc: Charles Case - Moore, Van Allen and Allen
Attorneys at Law
P. O. Box 26507
Raleigh, N. C. 27611

Charles Oldham
Route 12
P. O. Box 128
Sanford, N. C. 27330



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

August 10, 1984

*PA
File*

Mr. Walton Jones
EPA 3012 Regional Project Officer
Air and Hazardous Materials Division
345 Courtland Street, N.E.
Atlanta, Georgia 30365

RE: Preliminary Assessment Reports/
Transmittal Letter

Dear Mr. Jones:

Submitted under this cover are the Preliminary Assessment Reports for the following ERRIS List Sites in North Carolina:

North State Chemicals, Inc.
3301 Spring Garden Street
Greensboro, N. C. 27407

NCD991278839
Guilford County

The location noted here is where the facility began operations sometime in 1978 as a processor and reclaimer of industrial chemical wastes. The company had problems with the property owner and moved to another location. The State forced a cleanup of the second location when the company went out of business in 1983. Both sites are "clean" and are not CERCLA hazardous waste disposal sites.

Based on the review of available information we recommend that no further action is required at this site. It is therefore requested that North State Chemicals be placed on the inactive ERRIS List.

Rohm & Haas, Inc.
Cedar Creek Road
Fayetteville, N. C. 28302

NCD039047485
Cumberland County

This listing is an ERRIS List Duplication and therefore request that it be removed from ERRIS. The correct site identification is: Rohm & Haas Co. - Corodel Plant NCD990714479, Cedar Creek Rd, Fayetteville. The correct listing is already on the ERRIS List and a PA is being completed for the site. The RCRA ID number is also NCD990714479.

Hoover Universal, Inc.
1131 Blandwood Circle
High Point, N. C. 27261

NCD990715625
Guilford County

Hoover notified for some 600 gallons of paint sludges and solvents stored on site since 1972 in steel drums. The wastes were properly disposed of under RCRA. Past hazardous waste disposals were also requested and have been noted. No disposals on-site.

Based on the review of available information we recommend that no further action is required at this site. It is therefore requested that Hoover Universal be placed on the inactive ERRIS List.

Indian Grave Gap Drum Disposal
SR # 1513
Lenoir, N. C. 28645

NCD980839757
Caldewll County

In April of 1984 an undetermined quantity of relatively poor condition 55 gallon drums containing sludges and solids were reported to this office. Analyses of samples taken indicate some of the drums may contain hazardous wastes, heavy metals and organic solvents. This remote area, accessible by dirt road, has been used as a garbage dump for many years. Although no public health risks have been associated with this site a medium priority for site inspection is recommended. The SI would determine number and condition of drums, identify hazardous constituents present and check for wastes migration potential. The use of aerial photographs will probably be requested for the SI. An initial study for responsible parties should also be considered.

Therefore, based on the review of available information we recommend that this site remain on the active ERRIS List for further evaluation as a hazardous waste disposal site.

Photo Chemical Systems, Inc.
11 N. Pine Street
Wendell, N. C. 27591

NCD000831065
Wake County

The company is no longer at this address, and will not be at its present address after September of this year. This operation sells commercial chemicals to its customers to use for plating and finishing of printed circuit boards. They notified under RCRA as a transporter, so they could dispose of their customers chemical plating wastes as a service to the customer. All hazardous waste is manifested to SCA. No disposals or releases of hazardous waste were reported for either location.

Based on the review of available information we recommend that no further action is required at this site. It is therefore requested that Photo Chemical Systems be placed on the inactive ERRIS List.

Woolfolk Chemical Works
Wilson Road
Wendell, N. C. 27591

NCD991277807
Wake County

Woolfolk sold commercial brands of pesticides and herbicides in small prepackaged containers. They notified under RCRA as a precaution in case of a ruptured container or fire they would have an I.D. number. No disposals or releases were reported during the time they operated out of this location, 1978 to 1982. Woolfolk no longer operates in Wendell and has closed several such facilities, similar to this one, elsewhere in North Carolina.

Based on the review of available information we recommend that no further action is required at this site. It is also requested that Woolfolk be placed on the inactive ERRIS List.

DuPont
Station Road
Cedar Mountain, N. C. 28718

NCD003152329
Transylvania County

DuPont notified under CERCLA 103(c) of two (2) disposal sites on plant property. One for acid disposals, 1958-1963 and the other for a gel with 170 ppm cadmium chloride, 1973-1980. DuPont later notified 3012 of additional disposal sites on plant property during an information request by this office. These other disposal sites range from nonhazardous garbage to hazardous liquid solvent disposals. As far as potential problem areas, the liquid solvent waste disposals are probably of greater concern than some of the other solid hazardous waste burials. None of these disposals have ever had subsurface monitoring for G-W contamination. No public health risks are associated with these disposals as they are all confined to company property, which in this case is quite extensive.

Based on the review of available information a medium to low priority for site inspection is recommended for this site. Future work at these disposal locations would evaluate them for groundwater contamination and potential for off-site migration and impact. It should also be noted that N. C. Solid Wastes Rules for sanitary landfills were in possible violation and should be investigated for possible monitoring requirements under those rules. This site should remain on the active ERRIS List.

DuPont/Brevard Plant

NCD980557920
Transylvania County

This listing is an ERRIS List duplication and therefore request that it be removed from ERRIS. DuPont was on the list because of a 103(c) notification and a RCRA notification. This is one site and we request that DuPont be listed the same as in RCRA: DuPont NCD003152329. (see above for site priority, already in ERRIS)

Chloride Automotive Batteries
2539 Timberlake Road
Raleigh, N. C. 27604

NCD080894645
Wake County

This site is on the ERRIS List because of a RCRA notification. Our investigation shows that it is not a disposal site and that all wastes generated were taken off-site for disposal or re-use at other company facilities. This is not a CERCLA site. The RCRA program is investigating the site for improper closure under RCRA when the facility stopped manufacturing batteries here in 1981.

Based on the review of available information we recommend that no further action is required at this site. Therefore, it is requested that Chloride be placed on the inactive ERRIS List.

Westinghouse - Meter & Light Division
US #1 North
Raleigh, N. C.

NCD003195963
Wake County

This facility was placed on the ERRIS List due to notification under the RCRA program. However, investigation by this Branch shows that the facility does have an electroplating sludge pile/disposal area on site. According to our records, Westinghouse did not notify under a CERCLA 103(c) as required for hazardous waste disposal sites. It is possible they considered this "pile" to be storage and in that case should be addressed by RCRA. Further clarification of this matter is pending additional work by the RCRA program. If however, the hazardous waste is not addressed by RCRA we recommend a medium priority for site inspection at this time (SI completed 7-20-84). The SI should confirm the presence of the hazardous waste and sample for potential off-site migration. No public health risks noted.

Based on the review of available information we recommend that an investigation be initiated to determine the status of this site under RCRA or CERCLA and that the site remain on the active ERRIS List until the issue is resolved.

Note, past disposal activities of Westinghouse may lead to other disposal locations, off-site.

Southern Wood Piedmont Company
Greenfield Street
Wilmington, N. C. 28401

NCD058517467
New Hanover County

This site was the location of a wood treating facility from 1933 to 1983. They used, spilled and disposed on-site creosote residues, pentachlorophenol residues as well as CCA mixtures. The company is trying to address some of the areas of concern under their closure with RCRA. The other areas will not be cleaned-up. The major CERCLA area reported is where creosote sludges and residues were disposed in a lagoon and later buried. The site is on the edge of the Cape Fear River and G-W is reported to be only 18" below the surface. Significant creosote contamination was visible during a site visit on 7-23-84. (Soil & Water)

Based on the review of available information, we recommend a medium priority for site inspection at this site. Therefore it is requested that Southern Wood Piedmont remain on the active ERRIS List as a hazardous waste disposal site.

Note: Site referred to EPA for FIT evaluation and SI.

Southern Wood Piedmont Company
SR #2139
Gulf, N. C. 27256

NCD053488557
Chatham County

This site was reported by the company under a CERCLA 103(c) notification for disposal of creosote, PCP and CCA wood treating residues and sludges on site. The site was recommended for a medium priority for site inspection and referred to EPA for FIT evaluation. It was later learned that a FIT SI had been done in 1983. (Attached)

Based on the review of available information and the FIT SI a low priority for follow-up is recommended. This is based primarily on the conclusion that the FIT SI detected no off-site impact from past disposals. However, it is requested that this site remain on the active ERRIS List.

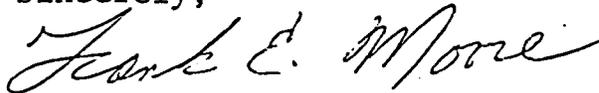
Note: The company is reportedly planning to do additional site clean-up in the future.

Mr. Walton
August 13, 1984
Page 6

Please find attached the site summary sheet for the above sites.

If you have any questions or comments regarding the contents of this report, please call me.

Sincerely,

A handwritten signature in cursive script that reads "Frank E. Moore".

Frank E. Moore, Geologist

Solid & Hazardous Waste Management Branch
Environmental Health Section

FEM:jj

PRELIMINARY ASSESSMENTS SUBMITTED TO EPA

Date August 13, 1984

EPA ID NUMBER	SITE NAME	DISPOSITION			NO FURTHER ACTION
		PRIORITY-INSPECTION HIGH	MEDIUM	LOW	
NCD991278839	N. State Chemicals, Inc.				X
NCD039047485	Rohm & Haas, Inc.		(Duplication)		X
NCD990715625	Hoover Universal, Inc.				X
NCD980839757	Indian Grave Gap Drum Disposal		X		
NCD000831065	Photo Chem Systems, Inc.				X
NCD991277807	Woolfolk Chemical Wks.				X
NCD980557920	DuPont/Brevard		(Duplication)		X
NCD003152329	DuPont		X to	(X)	
NCD080894645	Chloride Automotive Batt.				X
NCD003195963	Westinghouse		X		
NCD058517467	Southern Wood Piedmont		X		
NCD053488557	Southern Wood Piedmont		X to	(X)	

Log

6-13-84 - Tried to sk of Pick Shiver

6-14 - Not in Rec'd's area

Ed Berry

Lee Fleming (Ketter Modeling)

Ralph Berry Ed Berry

Ed Berry WRCN 3-2314 not in - Call tomorrow

7-3 - No answer will try again later

7-5 " " " " " "

ON VACATION 2WKS

Try on 23

PA OK

SI come in

ASK GIEEFFICE
FOR GUIDANCE

MOORE, VAN ALLEN AND ALLEN

ATTORNEYS AT LAW

200 W. MORGAN

P. O. BOX 26507

RALEIGH, N. C. 27611

919-828-4481



TELECOPIER
919-828-9530

CHARLOTTE OFFICE
3000 NCNB PLAZA
CHARLOTTE, N. C. 28280

704-374-1300

JAMES O. MOORE
WILLIAM K. VAN ALLEN
THOMAS W. STEED, JR.
ROBERT W. KING, JR.
JOHN T. ALLRED
R. BEVERLY R. WEBB
HARRY J. GRIM
GRAHAM D. HOLDING, JR.
R. MICHAEL CHILDS
ARCH T. ALLEN, III
BARNEY STEWART, III
GEORGE V. HANNA, III
GEORGE R. HODGES
JOHN C. FENNEBRESQUE
WILLIAM S. PATTERSON
ROBERT D. DEARBORN
W. B. HAWFIELD, JR.
STEPHEN D. HOPE
JEFFREY J. DAVIS
NOAH H. HUFFSTETLER, III
T. EDMUND RAST
CHARLES D. CASE
JOSEPH W. MCGIRT, JR.
DANIEL G. CLODFELTER

WILLIAM D. DANNELLY
JOSEPH W. EASON
CHRISTY EVE REID
FRED D. HUTCHISON
JAMES H. CLARKE
JULIA V. JONES
ANN HOGUE PAPPAS
CHRISTOPHER C. KUPEC
JAMES W. NOVIS
RANDEL E. PHILLIPS
STEVEN C. GARLAND
DEAN M. HARRIS
C. STEVEN MASON
HAYDEN J. SILVER, III
HAL A. LEVINSON
DONALD S. INGRAMAM
DUMONT CLARKE, IX
T. RANDOLPH PERKINS
RICHARD W. EVANS
A. MARK ADCOCK
ROBERT A. IZARD, JR.
JEAN GORDON CARTER
ROBERT V. BAKER

ARCH T. ALLEN: RETIRED

August 8, 1984

Mr. Tom Karnoski
Solid & Hazardous Waste
Management Branch
Dept. of Human Resources
Bath Building, Second Floor
306 North Wilmington Street
Raleigh, North Carolina

Re: Charles Oldham (200415/002)

Dear Tom:

Thank you for forwarding the EPA report to me. I have forwarded that to Mr. Oldham. I do not have the technical skills to evaluate all of the implications of the report; however, if you believe that the report provides sufficient evidentiary basis for your agency (or any other agency) to take action against the owners of the site, I would very much appreciate your contacting me or Mr. Oldham. Mr. Oldham can be reached at Route 12, P. O. Box 128, Sanford, N. C. 27330. His home telephone is 775-5031, and his office telephone is 323-1961, extension 202.

With best wishes, we remain,

Very truly yours,

MOORE, VAN ALLEN and ALLEN

Charles D. Case

CDC:kb

cc: Mr. Oldham

POTENTIAL HAZARDOUS WASTE ASSESSMENT AND ASSESSMENT

I. IDENTIFICATION
 D1 STATE | D2 SITE NUMBER
 NC | 053488557

NCD053488557 CHATHAM
 SOUTHERN WOOD PIEDMONT CO.
 2139 ST RD
 GULF

NC 27256

D3 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER

D4 STATE | D5 ZIP CODE | D6 COUNTY | D7 COUNTY CODE | D8 CONG DIST
 | | Chatham | 019 |

D9 COORDINATES LATITUDE LONGITUDE
 35 33 39. | 079 16 38.

D10 DIRECTIONS TO SITE (Starting from nearest public road)

Maps attached

III. RESPONSIBLE PARTIES

D1 OWNER (if known) | D2 STREET (Business, mailing, residential)
 Southern Wood Piedmont Co. | P. O. Box 5447
 D3 CITY | D4 STATE | D5 ZIP CODE | D6 TELEPHONE NUMBER
 Spartanburg | SC | 29304 | 1803 576-7660
 D7 OPERATOR (if known and different from owner) | D8 STREET (Business, mailing, residential)
 Same |
 D9 CITY | D10 STATE | D11 ZIP CODE | D12 TELEPHONE NUMBER
 | | | ()

D13 TYPE OF OWNERSHIP (Check one)
 A. PRIVATE B. FEDERAL: _____ C. STATE D. COUNTY E. MUNICIPAL
 (Agency name)
 F. OTHER: _____ G. UNKNOWN
 (Specify)

D14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
 A. RCRA 3001 DATE RECEIVED: ____/____/____ MONTH DAY YEAR B. UNCONTROLLED WASTE SITE (RCRA 103(e)) DATE RECEIVED: 6/9/81 C. NONE
 MONTH DAY YEAR MONTH DAY YEAR

IV. CHARACTERIZATION OF POTENTIAL HAZARD

D1 ON SITE INSPECTION BY (Check all that apply)
 YES DATE ____/____/____ MONTH DAY YEAR A. EPA B. EPA CONTRACTOR C. STATE D. OTHER CONTRACTOR
 NO E. LOCAL HEALTH OFFICIAL F. OTHER: _____ (Specify)
 CONTRACTOR NAME(S): _____

D2 SITE STATUS (Check one) | D3 YEARS OF OPERATION
 A. ACTIVE B. INACTIVE C. UNKNOWN | 1946 | 1980 UNKNOWN
 BEGINNING YEAR ENDING YEAR

D4 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
 Creosote, PCP, CCA Woodtreating sludges & residues left or disposed of on site

D5 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
 Surface and G-W contamination - Alleged damage to off-site property. Abandoned site w/alleged cosmetic clean-up. EPA alleged to have investigated- Awaiting results of inspection.

V. PRIORITY ASSESSMENT

D1 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Practices)
 A. HIGH (Inspection required promptly) B. MEDIUM (Inspection required) C. LOW (Inspect on site as possible) D. NONE (No further action needed, complete current information form)

VI. INFORMATION AVAILABLE FROM

D1 CONTACT | D2 OF (Agency/Organization) | D3 TELEPHONE NUMBER
 Charles Burdell | SWP | (803) 576-766
 D4 PERSON RESPONSIBLE FOR ASSESSMENT | D5 AGENCY | D6 ORGANIZATION | D7 TELEPHONE NUMBER | D8 DATE
 O. W. Strickland | DHR | S & HW | 619 733-2178 | 7, 25, 84
 MONTH DAY YEAR



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

L IDENTIFICATION
01 STATE | 02 SITE NUMBER
NC | 0053488557

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 A. GROUNDWATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____ 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
04 NARRATIVE DESCRIPTION

See file

01 B. SURFACE WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____ 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
04 NARRATIVE DESCRIPTION

See file

01 C. CONTAMINATION OF AIR
03 POPULATION POTENTIALLY AFFECTED: _____ 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
04 NARRATIVE DESCRIPTION

01 D. FIRE/EXPLOSIVE CONDITIONS
03 POPULATION POTENTIALLY AFFECTED: _____ 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
04 NARRATIVE DESCRIPTION

01 E. DIRECT CONTACT
03 POPULATION POTENTIALLY AFFECTED: _____ 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
04 NARRATIVE DESCRIPTION

01 F. CONTAMINATION OF SOIL
03 AREA POTENTIALLY AFFECTED: _____ (Acres) 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
04 NARRATIVE DESCRIPTION

See file

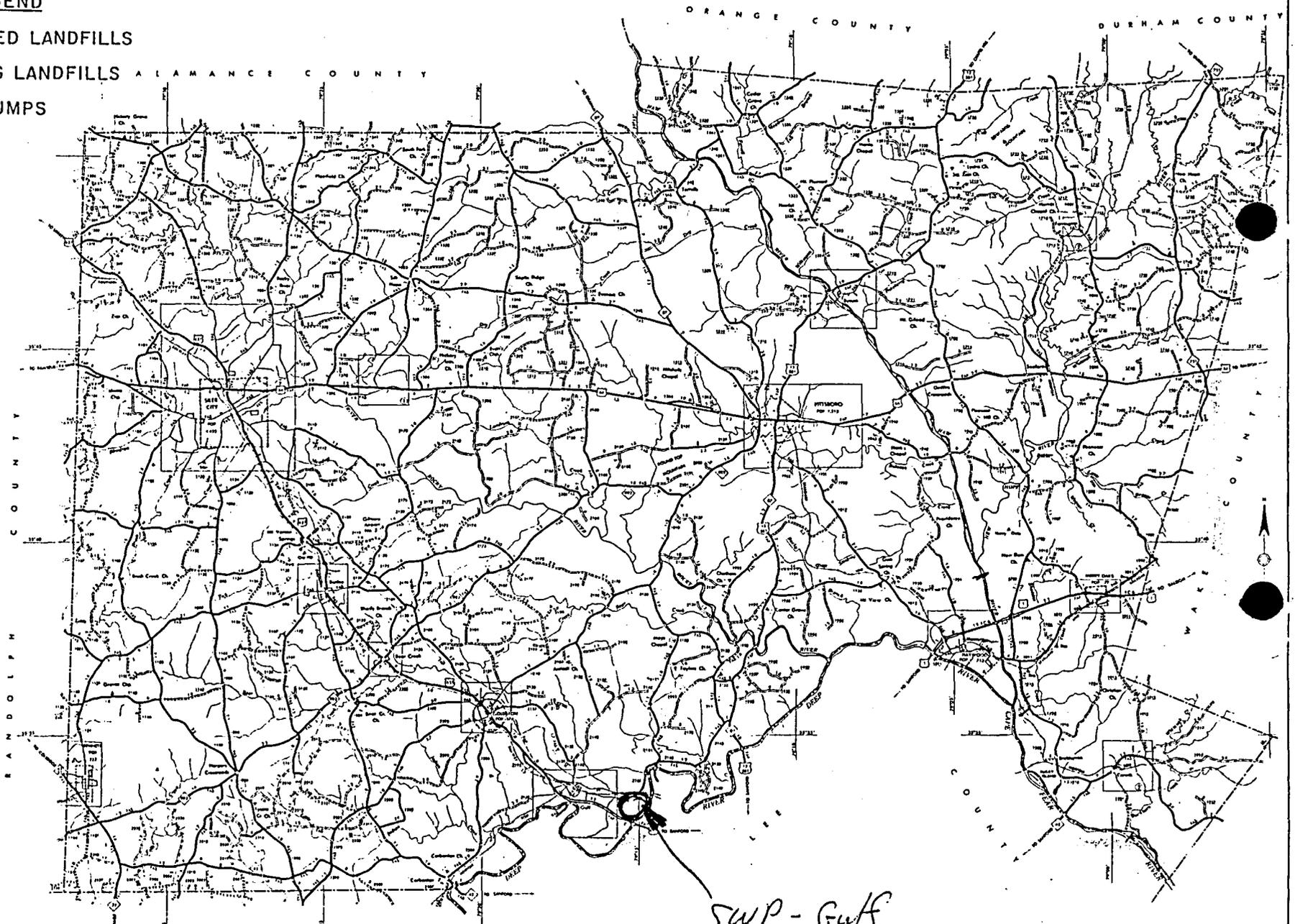
01 G. DRINKING WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____ 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
04 NARRATIVE DESCRIPTION

01 H. WORKER EXPOSURE/INJURY
03 WORKERS POTENTIALLY AFFECTED: _____ 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
04 NARRATIVE DESCRIPTION

01 I. POPULATION EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED: _____ 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
04 NARRATIVE DESCRIPTION

LEGEND

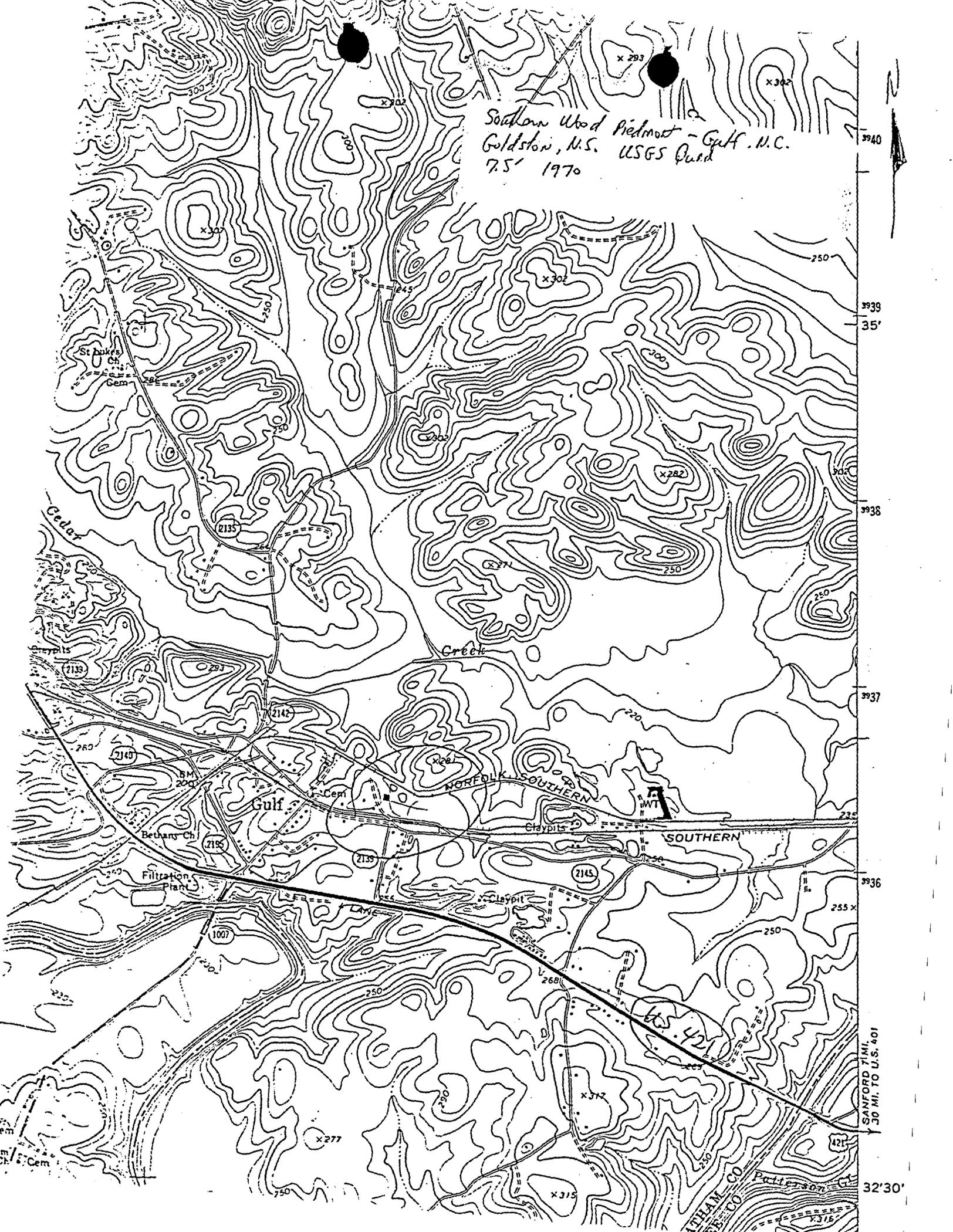
- PROPOSED LANDFILLS
- ◊ EXISTING LANDFILLS
- △ OPEN DUMPS



SCALE FOR ENLARGEMENTS

CHATHAM COUNTY
NORTH CAROLINA

Southern Wood Piedmont - Gulf, N.C.
Goldston, N.S. USGS Quad
7.5' 1970



3940

3939
35'

3938

3937

3936

3935
3934
3933
3932
3931
3930

32'30"

SANFORD T.M.
30 MI. TO U.S. 401

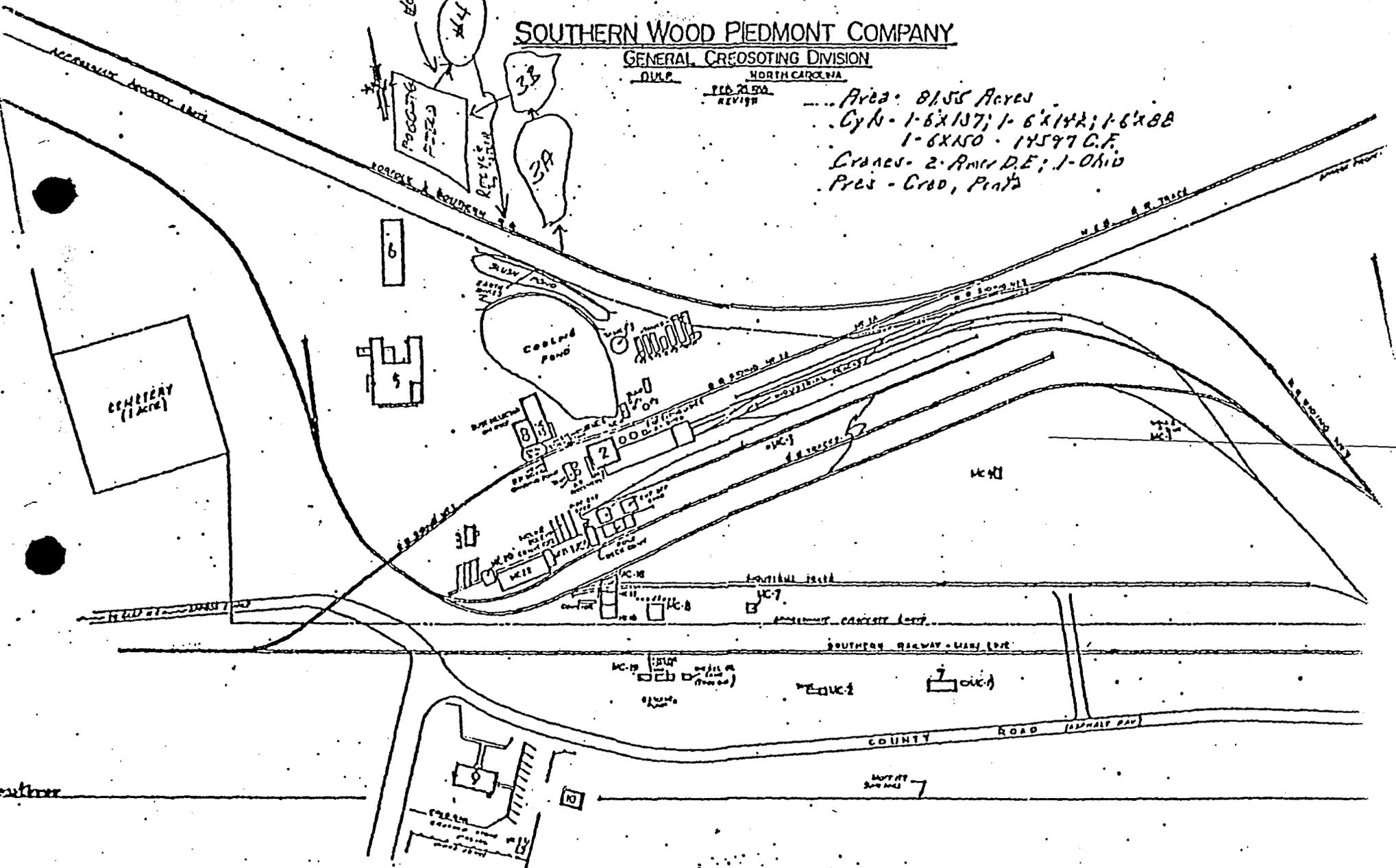
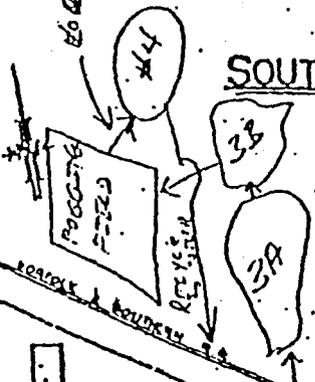
SOUTHERN WOOD PIEDMONT COMPANY

GENERAL CREOSOTING DIVISION
D.V.P. NORTH CAROLINA

FEB 21 1950
REVISED

Area: 81.55 Acres
Cyls - 1-6'x137; 1-6'x142; 1-6'x88
1-6'x50 - 14597 C.F.
Cranes - 2 - Amer. D.E.; 1 - Ohio
Pres - Crab, Pine

ROAD PLANT
100' x 100'



CEMETERY
(1 Acre)

COOLING POND

SOUTHERN RAILWAY - MAIN LINE

COUNTY ROAD (ASPHALT PAV)

CREOSOTING

ITT Gully

1. What did NRCO do to monitor & certify closure?
2. What was there at closure ~~that~~ ^{that} remained there?
3. What sampling & other investigation has been done since closure.
4. Does ~~NRCO~~ NRCO have any regs, standards or other authority that might support or call for action?

How about the permit & its conditions?

5. Does NRCO want to participate in the ~~investigation~~ ^{investigation}, etc. leading up to remedial action.

∴ What geological information do they have

2/83 Responses from Page Benton

- NRCO has asked that ITT put monitoring wells back in place, but has received no response.
- Data is at DEM field office
- DEM permit was ~~non-discharge~~ ^{non-discharge} for land application

~~no~~

1. No actual analytical test^{to} of anything in ponds was ever done
4. Permit was not an expiring permit, so DEM thinks that they can force them to put in monitoring well(s)

To: File

From: F. MOORE

Date: 5-13-84

A search of Durham County's central files did not reveal any information/correspondence on the Southern Wood Products - Gulf site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 20 1984

MEMORANDUM

SUBJECT: Participation of Potentially Responsible Parties in
Development of Remedial Investigations and Feasibility
Studies under CERCLA

FROM: *Lee M. Thomas*
Lee M. Thomas, Assistant Administrator
Office of Solid Waste and Emergency Response
Courtney M. Price
Courtney M. Price, Assistant Administrator
Office of Enforcement and Compliance Monitoring

TO: Regional Administrators, Regions I-X

I. Introduction

This memorandum sets forth the policy and procedures governing participation of potentially responsible parties (PRPs) in development of remedial investigations (RI) and feasibility studies (FS) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).¹ It discusses:

- o the circumstances in which RI/FS may be conducted by potentially responsible parties,
- o the procedures for notifying potentially responsible parties when the Agency has identified target sites for the development of RI/FS, and
- o the principles governing PRP participation in Agency-financed RI/FS.

1. The Agency is currently developing a comprehensive policy concerning EPA participation in state-lead enforcement under CERCLA. The applicability of the RI/FS policy to state-lead enforcement actions will be fully discussed in this forthcoming memorandum.

II. Previous Approaches to PRP Participation in RI/FS

Under earlier policy, the Agency negotiated with potentially responsible parties (PRPs) for individual phases of site response (i.e., RI/FS, design, construction). PRPs could negotiate to conduct the RI/FS without discussing the remedial design and construction. Fund-financed RI/FS were generally not performed until the Agency concluded that negotiations with private parties were unsuccessful. Negotiations concerning later phases of remedial action would occur after the RI/FS was completed.

This approach was designed to secure cleanup by PRPs instead of Superfund financed cleanup, if privately financed cleanup could be accomplished in a timely manner. This policy was initially expressed by EPA in the "Guidelines for Using the Imminent Hazard, Enforcement and Emergency Response Authorities of Superfund and Other Statutes" issued pursuant to §106(c) of CERCLA at 47 Fed. Reg. 20664 (May 13, 1982).

The Agency identified several drawbacks to the approach of negotiating for individual phases of the cleanup:

First, the negotiations for the RI/FS were often unsatisfactory because of frequent disagreements on the nature and scope of the RI/FS. In particular, protracted negotiations occurred over the details of investigating the hazard, both on and off-site. Disagreements also arose over sampling locations and frequency, well placement, analytical methods, quality control, and level of detection. Substantial delays occurred even when agreement was eventually reached.

Second, some RI/FS conducted by potentially responsible parties were inadequate and of little use to EPA in determining the extent of the remedy for a site. Because the Agency had not published guidance on conducting RI/FS, the only way to avoid these problems was for the Agency to provide extensive oversight and review of the RI/FS under development. In certain instances, the PRPs revised the completed RI/FS after further discussions with the Agency, or the Agency redid the RI/FS using CERCLA funds. These inadequacies and revisions demanded resources from the Fund and delayed site response.

Third, the Agency's willingness to negotiate with potentially responsible parties for the RI/FS for any or all sites affected the pursuit of the Agency's priorities. Occasionally, resources were diverted from on-going litigation, or the initiation of action at sites where prompt response was desirable. Priorities for the use of the Agency's enforcement resources were established on a "de facto" basis by PRPs, based upon their willingness to negotiate at particular sites, rather than on the Agency's assessment of the sites which needed to be addressed in a timely fashion and offered the best prospects for privately-financed response.

Finally, multiple negotiations concerning each phase of site response inefficiently used limited Agency and Department of Justice resources and personnel.

In response to these concerns, the Agency established a policy that precluded potentially responsible parties from conducting the RI/FS, unless they were also willing to commit to conducting the remedial action.

The Agency has also identified drawbacks to this approach. Some potentially responsible parties have wanted an opportunity to prepare an RI/FS or participate in its development. They have been reluctant to accept the conclusions in the RI/FS and to assume responsibility for conducting cleanup, because their views were not reflected in the Agency-financed RI/FS. This policy also increased demands on the Fund, and ran contrary to the Agency's preference for timely and effective private-party response.

In light of these drawbacks, the Agency has established a new policy concerning the conduct of RI/FS by PRPs. The Agency will give potentially responsible parties an opportunity to conduct the RI/FS, consistent with Agency priorities and with new Agency procedures and guidance. The new approach will better enable the Agency to target its enforcement priorities, reduce the possibility of unsuccessful or protracted negotiations with PRPs, and enhance the quality of private-party RI/FS.

III. Situations where private parties may conduct RI/FS

The Agency will identify sites targeted for RI/FS development, and give potentially responsible parties an opportunity to conduct the RI/FS. The Remedial Accomplishments Plan (RAP) developed by the Agency identifies candidate sites for enforcement or Fund-financed response, and allocates the resources necessary to undertake these activities. The Remedial Accomplishments Plan lists all sites for which RI/FS will be developed.

Approximately 95 sites from the National Priorities List have been identified as targets for development of RI/FS in FY 1984, and about 115 will be identified for FY 1985. The Agency has allocated CERCLA funds for RI/FS for each of these sites. EPA will make available a list of the sites on the Remedial Accomplishments Plan, and the scheduled dates for obligation of funds for RI/FS development by the Agency at these sites. Potentially responsible parties will have an opportunity to conduct the RI/FS for these sites, provided that they respond before the scheduled date for obligation of funds.

The Agency will not engage in lengthy negotiations with PRPs over whether PRPs will conduct the RI/FS. In setting a reasonable negotiating period, the Agency will consider factors specific to the site, such as technical complexity and the number of parties involved. Once funds for an Agency-financed RI/FS have been obligated, PRPs will not be allowed to take over development of the RI/FS.

If potentially responsible parties are willing to perform the RI/FS, the Agency will identify the conditions under which they may do so. To assure that privately-funded RI/FS are done quickly and in a manner that meets the applicable requirements of this policy, potentially responsible parties will be expected to meet the following conditions:

1. Where several parties are involved at a site, they must be able to quickly organize themselves into a representative body to deal with the Agency as a single entity. To facilitate this process, the Agency will make the names of potentially responsible parties available on request. (See guidance from Gene A. Lucero and Kirk Sniff on Release of Names of Potentially Responsible Parties in Response to FOIA Requests published January 26, 1984). A single PRP, or an organized group of PRPs, may assume responsibility for actual development of the RI/FS.
2. PRPs must agree to follow the scope of work for the RI/FS developed by the Agency. The Agency will not engage in lengthy negotiations over this issue.
3. PRPs must demonstrate to the Agency that they are able to follow the technical procedures described in Remedial Investigation and Feasibility Study guidance manuals currently under development.²

If these conditions are met, the Agency will devote the resources necessary to assure the satisfactory development of the RI/FS by private parties. The conditions governing private-party conduct of the RI/FS should be formalized as Administrative Orders (either unilateral or on consent) or Consent Decrees wherever possible.³ The Agency is developing a model "generic" consent order for privately-conducted RI/FS so that consistent and complete agreements can be expeditiously negotiated.

-
2. The Feasibility Study guidance and the Remedial Investigation guidance are scheduled for completion in the summer of 1984.
 3. EPA may issue orders under section 106 when it determines that there may be an imminent and substantial endangerment to public health or welfare or the environment. The Regions should review and if necessary update the information gathered to justify the listing of a site on the National Priorities List. This information will be valuable in developing the endangerment assessment needed to justify issuance of the order.

If, in the Agency's judgment, the potentially responsible parties do not meet these criteria (that is, they are not able to properly conduct the RI/FS), the Agency will not commit resources to review the private-party RI/FS. Instead, the Agency will perform the work itself and seek to recover the costs of the RI/FS. PRPs will be given the opportunity to discuss implementation of the selected remedy at a later date.

The Agency normally allocates the equivalent of about 1.1 work-years for start-up, management, and selection of remedy for each Fund-financed RI/FS developed by a government contractor. These resources will be redirected to oversee and review the privately-conducted RI/FS. It is the Agency's view that responsible parties are liable for costs of oversight of RI/FS development. A commitment to reimburse the Agency for oversight costs should be negotiated in advance.

The Agency will review the completed work product, assess the various alternatives under consideration, and choose the remedial alternative that best meets all applicable requirements of CERCLA. Development of private-party RI/FS will be subject to EPA community relations requirements. ⁴ (ROD)

The Agency believes that this approach will enhance the prospects for private-party implementation of the remedy and also provide a mechanism to clean up additional sites in the future. As potentially responsible parties become more familiar with conducting RI/FS under the Remedial Investigation and Feasibility Study guidances, and Agency personnel develop more experience in overseeing and evaluating them, we anticipate that it will take less than a full Agency workyear to assure the completion of a technically sound RI/FS. As a result of this experience, EPA will be able to oversee additional privately-financed RI/FSs with a given level of resources and, consequently, initiate the response process by private parties at more NPL sites.

IV. Applicability of Policy

This policy is prospective. PRPs will be allowed to conduct RI/FS for targeted sites on the basis of these criteria when the Remedial Investigation and Feasibility Study technical manuals and any other necessary technical manuals are final. We anticipate that these documents will be completed in the summer of 1984.

This policy will also be applicable to sites where States have the lead in managing preparation of the RI/FS. Where possible, States should be involved in the determination of whether PRPs can properly conduct the RI/FS, and in review of the workplan. States may also assume some responsibility for oversight of PRP conduct of the RI/FS.

4. Requirements are set forth in Community Relations in Superfund: A Handbook (Interim Version,) September 1983.

This policy is applicable to sites that the Agency has identified as targets for RI/FS development in the Remedial Accomplishments Plan. The Agency will not provide resources to oversee and evaluate RI/FS for sites that have not been so designated. While potentially responsible parties are free to conduct their own RI/FS for other sites which have not been listed as priorities; the Agency does not have sufficient resources to provide assistance or review the RI/FS during their development.

This exclusion is designed to allow the Agency to manage its resources and assure that they are directed towards sites that represent the Agency's priorities. Thus, the Agency cannot review private-party RI/FS for non-targeted sites to provide assurances that the remedy selected by potentially responsible parties will be adequate to meet the requirements of CERCLA.

V. Interim Policy and other situations for private-party RI/FS

Until the RI and FS guidance documents are made final, potentially responsible parties may also develop RI/FS if they commit to follow workplans for RI/FS that have been prepared by the Agency contractors under the supervision of the Agency. The Agency will not negotiate the content of these workplans.

Implementation of this interim policy is at the discretion of the Regions. Regions may allow PRPs to conduct RI/FS under workplans developed by Agency contractors if the RI/FS can be conducted without undue disruption to schedules for remedial response, in light of existing commitments for activities to be undertaken under the Fund. Regions should complete any negotiations concerning this interim policy before the last month of the fiscal year, to assure that these negotiations will not interfere with use of Fund resources. Where the State is managing the development of the RI/FS, this interim policy may be applied at the discretion of the State.

The Agency will sanction private-party RI/FS for sites that are not identified on the Remedial Accomplishments Plan in two other situations.

First, private parties may perform the RI/FS if they also agree to design and implement the remedy selected by the Agency for the site. The Agency will allow private party development of the RI/FS because the resources that would have been dedicated to negotiations with potentially responsible parties for the remedial design and construction can instead be used to oversee and review the privately-conducted RI/FS. Thus, PRPs may conduct the RI/FS for any NPL site (even if the site is not listed in the Remedial Accomplishments Plan) if they commit to the complete clean up as well.

Second, the Agency will allow a private party RI/FS for dioxin sites that are active facilities, where the scope of the remedial investigation has been comprehensively defined by the Federal government. The explicit requirements developed by the Federal government--coupled with the public interest to move quickly on recently discovered dioxin sites--warrant this approach.

VI. Arrangements for Notice to PRPs

PRPs will be notified of the opportunity to perform the RI/FS in the following way:

First, the list of sites targetted for RI/FS development and a schedule for action at those sites will be made available. It will be accompanied by a statement that the Agency plans to conduct RI/FS for the sites. Any potentially responsible party that wants to undertake the RI/FS can voluntarily come forward and contact the Agency, before the scheduled date to obligate funds for RI/FS development.

Second, prior to the scheduled start of the RI/FS, the Agency will send notice letters to PRPs for sites listed on the Remedial Action Plan. Notice letters should be issued as soon as possible after the completion of the responsible party search. The letters should normally be issued at least 60 days before the scheduled date for obligation of Funds for the RI/FS. PRPs (if multiple generators are involved) should therefore have sufficient time to organize themselves and initiate preliminary contacts and discussions with Agency personnel. This will also avoid delay in beginning a Fund-financed RI/FS should it become necessary.

The notice letters will inform the potentially responsible parties that:

1. Fund-financed RI/FS actions are planned;
2. The results of the studies will be used to select a remedy for the site;
3. PRPs can meet with Agency personnel to discuss their participation in the RI/FS;
4. PRPs may be liable for the costs of the RI/FS performed by the government;
5. PRPs will have an opportunity to meet with Agency personnel to discuss design and implementation of the remedy after completion of the RI/FS.
6. PRPs may conduct RI/FS if they comply with the conditions outlined in section III of this policy.

The Agency will develop revised Notice Letter guidance in the near future that will provide additional detail on these requirements.

VII. Regional Role in RI/FS Development by PRPs

Regional review of private-party RI/FS will be intensive when this policy is first implemented. Implementation will require the ongoing involvement of the EPA project officer in the private-party RI/FS development. The PRPs must develop a detailed statement of work and work plans describing the activities they will undertake at the site, based on the guidance and the scope of work developed by the Agency. The Regions must arrange to periodically review the work plans and work performed as part of the RI/FS. The Regions must assure that PRPs follow proper chain of custody procedures in testing and sampling, and that PRPs keep adequate records to enable the government to use these records as evidence in an enforcement case. In addition, employees of contractors or others who do the work must cooperate with and be made available to the government in the preparation and trial of any subsequent enforcement case.

The Agency will review the completed work product and choose a remedial alternative that meets all applicable requirements of CERCLA, and all implementing regulations, policies and guidance. In addition, the Agency retains the right to reject PRP RI/FS and sue PRPs for cost of developing its own Fund-financed RI/FS, if the RI/FS is inadequate. As noted earlier, the agreement to conduct a private-party RI/FS should be incorporated into an administrative order or consent decree. Section 107 of CERCLA authorizes the imposition of treble damages for failure to comply with an administrative order. The Agency will develop a model order providing additional detail regarding EPA involvement in private party RI/FS development.

(ROD)

VIII. Private-party Participation in Agency-Financed RI/FS

Where potentially responsible parties do not actually develop the RI/FS, the Agency will allow private-party involvement in Fund-financed RI/FS, if such participation can occur without undue delay, expense, or interference with Agency RI/FS development. Private parties may possess technical expertise or knowledge about a site which would be useful in developing a sound RI/FS. Involvement by PRPs in the development of a Fund-financed RI/FS may also expedite site cleanup by identifying and satisfactorily resolving differences between the Agency and private parties that might otherwise be the subject of litigation.

Potentially responsible parties may be allowed to:

1. Review the contractor's technical work plan;
2. Have access to the site (if legally feasible) to observe well installation and the collection of samples, and to split samples where appropriate;
3. Have access to raw data and to draft reports;
4. Have the option to comment on each major phase of the RI/FS during the conduct of the investigation.

The final decision whether to permit potentially responsible parties to participate in the Fund-financed RI/FS (as well as the scope of any participation) rests with the Regions. This decision should be based on the ability of PRPs to organize themselves so that they can participate as a single entity, and the ability of PRPs to participate without undue interference with or delay in completion of the RI/FS, and other factors that the Regions determine are relevant. The Region may terminate PRP participation in RI/FS development if unnecessary expenses or delays occur.

Certain aspects of this policy are not applicable immediately, and supplementary guidance will be published. If you have any questions or comments concerning this policy, or problems that need to be addressed in further guidance to implement this policy, please contact Gene A. Lucero (382-4814), or John Cross on his staff (FTS 382-4829).

cc: Regional Counsel
Regions I-X

Directors, Waste Management Division
Region I, V

Director, Office of Emergency and Remedial Response
Region II

Director, Hazardous Waste Management Division
Region III

Directors, Air and Waste Management Division
Regions IV, VI, VII, VIII, X

Director, Toxics and Waste Management Division
Region IX



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

RECEIVED

December 29, 1983

JAN 9 1984

WATER QUALITY SECTION
OPERATIONS BRANCH

MEMORANDUM

TO: Solid and Hazardous Waste Branch Staff

FROM: June Swallow, Engineer

June Swallow

SUBJECT: ERRIS List Site Information

The abandoned sites group is about to begin work on the following list of sites. Please read through the list, check any sites that you have information on, and then return the list. Even if you have no information on any of the sites, tell us and return the list as this is valuable information too. We ask this so that we can do a thorough job, and to avoid duplication of effort. One of us will get back to you to read the file or discuss the site(s) when we get to it.

Thank you for your cooperation.

JS:jj
Attachment

cc: Frank Moore, Geologist
Lee Crosby, Chemist

RECEIVED

DEC 30 1983

WATER QUALITY SECTION
OPERATIONS BRANCH

B.11
Mills
DeWeese
Tedder
Campbell

Pls. review and forward any information you might have on any of these sites to me by January 13, 1984. Thank you.

Forrest Westall
1/6/84

Fishburne Landfill (c	Airport Rd. cher
Grove Stone Landfill (closed)	Grove Stone Rd., Black Mtn.
Fairview Landfill (closed)	Fairview Rd., Fairview
Pond Road Landfill (closed)	Pond Rd., Asheville
Hominy Creek Landfill (closed)	Rhododendron Park, Asheville
Swannanoa Landfill (closed)	Hwy 70 East, Swannanoa
Elk Mountain Landfill (closed)	Elk Mtn Rd., Asheville
Buncombe County Landfill (11-02)	Hwy 191 North, Asheville
Caldwell County Landfill (14-01)	N. C. Hwy 90, Lenoir
Lenoir City Solid Waste Burial	904 Virginia St., Lenoir
Lexington Municipal Landfill	US 64 East, Lexington
Graham County Landfill (38-01)	Atohah Rd., Robbinsville
Henderson County Landfill (45-01)	St. Rd. 1758, Hendersonville
Lee County Landfill (53-01)	St. Rd. 1177 on Rd. 1238, Sanford
City of Charlotte Landfill	York Rd., Charlotte
UNC Old Solid Waste Burial Site	Airport Rd., Chapel Hill
Greenville City Landfill (closed)	Fifth Street, Greenville
City of Greenville Utility Dept. Burial Site	Port Terminal Rd., Greenville
Asheboro Municipal Landfill	Old US 64, Asheboro
Swain County Landfill (87-01)	Buckner's Branch, Bryson City
DuPont/Brevard Plant	Brevard — NPDES permit
NCSU Lot 86, Farm Unit #1	Carter-Finley Stadium, Raleigh
Wilkes County Landfill (97-02)	Greenhorne Rd., Ronda
Unican Security Systems	400 Fawn Drive, Rocky Mount
Amcel Propulsion, Inc.	Off Beetree Rd., Swannanoa Township, Swannanoa
Southern Wood Piedmont	St. Rd. 2139 Gulf Land Application System
Monarch Furniture/Thaden Molding	300 Scientific St., Jamestown - Pretreatment To Jamestown
Carolina Aluminum	Metcalf St., Winton — NPDES permit
SCM Corp./Glidden Coatings Resins Div.	3926 Glenwood Dr., Charlotte

Castle Hayne Quarry	Country Rd. 2002, Castle Hayne
Diamond Shamrock/Castle Hayne Plant	Off St. Rd. 202, Castle Hayne NPDES / Non-Disch
Hercofina/Hanover Plant	Hwy 421 N., Wilmington - NPDES permit
R. J. Reynolds Tobacco Co.	Brooke Cove St., St. Rd. 1941, Winston-Salem
Koppers Co., Inc.	Hwy 54 West, Morrisville
Cone Mills Corp./Granite Finishing Plant	Old Hwy 70, Haw River
Weyerhaeuser Company/Lewiston	Hwy 308, Lewiston
Dupont, E.I./Cape Fear Plant	St. Rd. 1426, Phoenix NPDES permits
Kerr-McGee Chemical Corp.	Navassa Rd., Navassa
Style Upholstering, Inc.	33 23rd Ave. NE, Hickory
Weyerhaeuser Co.	St. Rd. 1916, Moncure NPDES permit
Allied Corp./Moncure Plant	Pea Ridge Rd., Moncure NPDES permit
Kaiser Acme Farmmarket	St. Rd. 1870, Riegelwood
USS Agri-Chemicals Farm Service Center	Hwy 701, Whiteville
LCP Chemicals (Acme Plant)	Industrial Dr., Riegelwood
LCP Chemicals	B St. and Dixie Hay, Riegelwood
Monsanto Company	Cedar Crk Rd., Fayetteville NPDES permit
Burlington Furniture (Lumber Plnt 191)	US 64 East, Lexington NPDES permit
Southern Résins	1510 Denton Rd., Thomasville Non discharge permit
Monsanto, Triangle Park Development Ctr.	3025 Cornwallis Rd., RTP
Mitchell Engineering Co.	Hwy 301 Bypass, Rocky Mount
Johnson Controls/Globe-Union	Old Greensboro Rd., Winston-Salem
Douglas Battery Manufacturing Co.	500 Battery Dr., Winston-Salem
Beaunit Corp./Dyeing and Finishing Plant	3801 Kimwell, Winston-Salem
Burlington Furniture/Robbinsville Plant	116 Atohah St., Robbinsville
Cone Mills Corp./Print Works Plant	1800 Fairview St., Greensboro
American Petrofina MKTG/Greensboro Term.	7115 W. Market St., Greensboro NPDES permit.
Unitex Chemical	520 Broome Rd., Greensboro
Private Farm	Rte. 1, Stokesdale
Helena Chemical Company	Dennis St. Ext., Enfield

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: JUL 13 1984

SUBJECT: Southern Wood Piedmont Hazardous Waste Site Investigation, Gulf, NC,
September 21, 1983

FROM: Hazardous Waste Section

Al Smith, Chief
TO: ERRB, AWMD

THRU: M. D. Lair, Chief
Hazardous Waste Section *M. D. Lair*

M. R. Carter, Chief
Engineering Support Branch *M. R. Carter*

EPA
57 File

The subject report has cleared the regional peer review process and is ready for final distribution. Would you see that a copy of the report is sent to the following:

- ✓ Mr. Tom Karnoski
North Carolina Department of
Human Resources
Division of Environmental Mgmt.
P. O. Box 27687
Raleigh, North Carolina 27611

8-7-84
Jim *Medium - Low*
For Follow-up

Charles A. Till
Charles A. Till, P.G.

cc: Finger/Adams/Carter/Lair

This action is brought under the citizen suit provisions of RCRA (42 USC 6972)

The violation complained of which is allegedly of non-discretionary duty of the Administrator to remedy, is the final facility standards adopted under 42 USC 6924 and reg. adopted pursuant

Query - Is this a facility under RCRA or can it be addressed only under Superfund?

42 USC 6973

Query - Why didn't they sue under imminent hazard?
(1) may not think it is that hazardous
(2) it is apparently "discretionary" on part of Administrator as to whether to clean up an imminent hazard.

Query - Why ~~not~~ didn't they sue under "Superfund"?
(1) Because Oldham would have to clean up first, then sue for reimbursement, or show damage to natural resources.



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

July 14, 1983

MEMORANDUM

TO: Tom Meacham
FROM: Glenn Dunn *Ed Dunn*
SUBJECT: Notice of Intent to Sue from Charles Oldham

I am transmitting to you a copy of the above reference notice. I believe, based on my previous discussions with Charles Case, that Oldham wants the site cleaned up and monitored.

EPA and this Branch have already done some investigation of the site and have run tests on some soil samples. It is my understanding that EPA is now willing to further investigate and consider remedial action under "Superfund". I will try to get EPA to move as quickly as possible and perhaps filing of the suit can be forestalled if some progress is being made along those lines.

I'll be out of town the week of the 17th, and will talk to you more about this when I return.

GD:lc

NOTICE OF INTENT TO SUE

TO: Administrator
Environmental Protection Agency
Washington, D.C. 20460

Regional Administrator-Southeast Region
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Mr. O. W. Strickland, Director
Solid and Hazardous Waste Management Branch
Division of Health Services
North Carolina Department of Human Resources
Post Office Box 2091
Raleigh, North Carolina 27602

Chief Operating Officer
Southern Wood Piedmont Company
Post Office Box 5447
Spartanburg, South Carolina 29304

Director, Environmental Affairs
ITT Rayonier, Incorporated
Post Office Box 45165
Atlanta, Georgia 30320

Chief Executive Operating Officer
ITT Rayonier, Incorporated
1177 Summer Street
Stamford, Connecticut 06904

Chief Executive Officer
International Telephone and Telegraph Corporation
World Headquarters
320 Park Avenue
New York, New York 10022

C. T. Corporation Systems, Registered Agent in North
Carolina for I.T.T. and Southern Wood Products Company
Wachovia Building
100 South Corcoran Street
Durham, North Carolina 27702



THIS NOTICE OF INTENT TO SUE is given pursuant to 42 U.S.C.
§ 6972(a)(1) and 40 C.F.R. § 254. Charles Oldham owns property situated in

Gulf, Chatham County, North Carolina. Mr. Oldham's property is adjacent to property in Gulf, Chatham County, North Carolina, that was formerly used as a wood treatment facility by Southern Wood Piedmont Company, which is a subsidiary of ITT Rayonier, Incorporated, which in turn is controlled by International Telephone and Telegraph Corporation. Southern Wood Piedmont Company, which operated its wood treatment plant during the years 1946 to 1980, disposed of certain waste generated by its production processes on the land where the plant was situated. In 1980, the plant was closed and remaining wastes were partly disposed of on the property pursuant to Permit No. 3931-R, issued by the Division of Environmental Management of the Department of Natural Resources & Community Development of the State of North Carolina. Wastes believed to be disposed of at this site include, but are not limited to, creosote, pentachlorophenol and copper chromic arsenic sludges, all listed as hazardous constituents in 40 C.F.R. § 261, Appendix VIII. Upon the conclusion of operations at the Southern Wood Piedmont Company site in 1980, the plant was dismantled and the area was landscaped.

A black liquid has and now continues to bubble to the surface at the site of the former Southern Wood Piedmont Company plant and this black liquid now continues to leak into a free flowing stream that then runs through the property of Mr. Oldham. It is asserted that Southern Wood Piedmont Company and those corporations in control of that company are in violation of various sections of federal and state statutes and regulations relating to solid waste and hazardous waste disposal. It is specifically asserted that the leakage of waste products from the Southern Wood Piedmont Company site is in violation of 42 U.S. Code § 6924 and the implementing regulations in 40 C.F.R. § 264. The failure of Southern Wood Piedmont Company and those corporations in control of

that company properly to dispose of the hazardous waste at the Chatham County site and to monitor and prevent the leakage of the waste material now coming from the disposal site present a continuing, imminent and substantial endangerment to the health and environment and to Charles Oldham's use and enjoyment of his property, which is contiguous to the property on which the hazardous wastes were disposed.

The address of the complainant in this notice is: Mr. Charles Oldham, Route 12, Box 128, Sanford, North Carolina 27330.

Legal counsel for Mr. Oldham in this matter is: Charles D. Case, Moore, Van Allen and Allen, Post Office Box 2058, Raleigh, North Carolina 27602 (telephone 919/828-4481); and Ms. Rhonda Ennis, 600 West Front Street, Post Office Box 1102, Lillington, North Carolina 27546 (telephone 919/893-4765).

This Notice of Intent to Sue is given to provide the above-mentioned parties notice in accordance with the provisions of 42 U.S. Code § 6972 and 40 C.F.R. § 254 only, and does not circumscribe, limit, forfeit, or waive any of Mr. Oldham's rights, causes of action, or interests whatsoever.

This the 12th day of July, 1983.

MOORE, VAN ALLEN AND ALLEN

By Charles D. Case
Charles D. Case

By Donald S. Ingraham
Donald S. Ingraham

Post Office Box 2058
Raleigh, North Carolina 27602
Telephone: 919/828-4481



March 10, 1983

Mr. Edward L. Gibbs
Environmental Manager
Southern Wood Piedmont Company
P. O. Box 3447
Spartanburg, E. C. 29304

Dear Mr. Gibbs:

Subject: Southern Wood Piedmont
Spray Irrigation Site
Chatham County

Our office has received your check for the copies of the analysis performed on sampling conducted by Jim Founds and Lars Godwin on March 26, 1982. Attached you will find copies and a receipt for your check.

During our evaluation of the site, this office realized that the groundwater monitoring well had been closed. Permit No. 3931-R was issued on August 20, 1980 and contained no expiration date; therefore, this permit is still active. Condition No. 16 of that permit states that, "Monitoring facilities including a groundwater monitoring well located approximately 30 feet north of pond No. 7 shall be constructed, and monitoring reports and data shall be submitted as required by the Division of Environmental Management, Water Quality Section". It is the recommendation of this office that a groundwater monitoring well be established on the site and that monitoring reports be submitted on a quarterly basis to this office. Location of the well and parameters to be analyzed will be specified by Mr. Ed Berry of this office. You should contact Mr. Berry as soon as possible.

If you have any further questions, please feel free to contact me at our office number (919) 733-2314.

Sincerely,

RWT:LDC/mdp

cc: Ted Mey
L. P. Denton
Ed Berry

R. W. Van Tilburg
Regional Supervisor
Raleigh Regional Office

MOORE, VAN ALLEN AND ALLEN
ATTORNEYS AT LAW
701 BB & T BUILDING
P. O. BOX 2058
RALEIGH, N. C. 27602
919-828-4481

Tom
South Carolina
Permit
Chatham



ENCLOSURE MEMO

TO: Glenn Dunn

FROM: Charles Case

DATE: March 23, 1983

ENCLOSURES: Oldham - Hazardous Waste

near Gull and Chatham County. Note that in permit number 3951/R, paragraph 16 requires monitoring and paragraph 3 requires that "[t]he facility shall be properly maintained and operated at all times." The permit also states that it is effective from the date of issuance until rescinded.

Mr. Oldham is forwarding copies of the monitoring reports which we reviewed Thursday night.

I hope that this information will assist you in your efforts, which, I can assure you, are appreciated.

With best wishes, I remain

Very truly yours,

MOORE, VAN ALLEN and ALLEN



Charles D. Case

CDC:tmw
Enclosures
cc: Charles Oldham (w/o encl.)

P.S. - Thanks for the brief.



Dear Bill,

Enclosed are the samples from the Southern Wood Piedmont landfill at Tully, N.C. Lars Lockman at NRCO has the originals. Please let me know how I can help.

Sincerely,

Charles Oldham

e: January 26, 1982

County: Chatham

Notifier's name and address: C. A. Council

P.O. Box 5447, Spartanburg, S.C. 29304

Contact's name: Mr. Charles Burdell *803) 576-7660

Site name and address: Southern Wood Piedmont

State Road 2139, Gulf, N.C. 27256

Site location: _____

Type of waste: Possible creosote, pentachlorophenol, copper chromic
arsenic sludges

What process generated the waste? Wood Preservation Treatment

Volume of waste: _____

Method of storage or disposal: on-site burial

Dates of waste activity: 1946 - 1980

Site history: C. A. Council notified that Southern Wood Piedmont Company buried creosote, pentachlorophenol, and copper chromic arsenic sludges on plant property between 1946 and 1980. The plant, located in Gulf, N.C., ceased operations in 1980.

EPA, DEM

*The preceding information is based on preliminary data supplied by the Environmental Protection Agency, and not on detailed site investigations.



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

January 19, 1982

MEMORANDUM

TO: O. W. Strickland, Head
Solid & Hazardous Waste Management Branch

FROM: Larry D. Perry, District Representative *LDP*
Solid & Hazardous Waste Management Branch

SUBJECT: Interim Status Inspection - Generator, TSD, and Transporter
Southern Wood Piedmont Co.
2139 State Road
Gulf, NC 27256
EPA I.D. #NCD053488557
Contact: Mr. C.A. Burdell - Director, Technical Services
Southern Wood Piedmont Co.
P.O. Box 5447
Spartanburg, SC 29304

On September 16, 1981 an inspection was to be made on this site. Upon arrival at the site, there was nothing there. The facility had been closed down, completely disassembled and moved to a new location (explained in attached information). Upon walking over the facility site I found a sign stating that the area was posted due to a chemical dump or burial area located at the site. I talked with a man at a garage across the street from the site and he stated that there had once been a wastewater chemical holding pond on the site. From my observation the site had been completely re-landscaped and there was no evidence of any holding pond - everything was level and smooth.

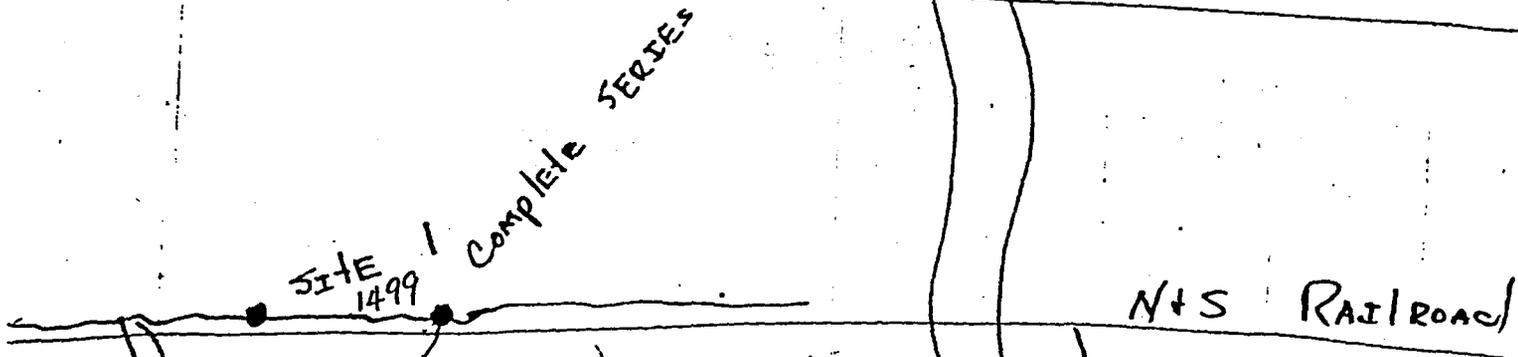
I phoned several people with other Southern Wood locations and finally was able to get some information from this Mr. Burdell. He informed me that he thought that he had properly closed out the site with his meeting and correspondence with Stan Taylor in the summer and fall of 1980 - see attached letters. He also listed the site on Superfund.

The reason for the delay in this report is due to the difficulty in obtaining the enclosed paper work from Mr. Burdell. He finally sent the material after several requests - each time he promised faithfully to send the information but I had to keep reminding him.

Since obtaining the information, no further contact has been made with Mr. Burdell by this inspector concerning proper close-out, etc.

LDP:ns

TEST AT SW P.
SOUTHERN RR



Complete SERIES

N+S RAILROAD

Check
[scribbled out]

James Pounds
{ Sara Hodwin
Keeps who took samples.

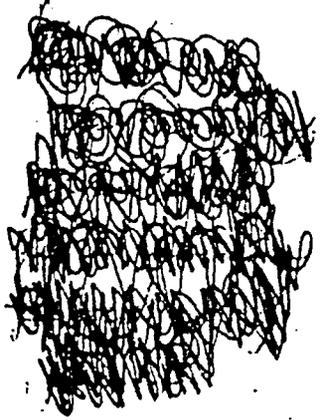
SEDIMENT,
LISTED AS ON
OUR PROPERTY
1500

Robert took some
here 1501

~~Mr. Robbs~~
Mr. Robbs
or Robbs
take Joe
Morgan's
place
at
SW P.
↑
OKed
samples

Complete SERIES 1502

Complete SERIES
1503



Complete series 1507

Complete series 1506
plus sediments 1505

Complete series 1504

LITTLE CEDAR CREEK

N.C. DEPT. OF NATURAL RESOURCES & COMMUNITY DEVELOPMENT

LAB NUMBER 00008: 1499

DIVISION OF ENVIRONMENTAL MANAGEMENT
WATER QUALITY FIELD-LAB FORM (DM1)

DATE RECEIVED: 8/23/79

RECEIVED BY: H. H. [Signature]

DATA ENTRY BY: [Signature]

DATE REPORTED: [Blank]

COUNTY: Chatham
RIVER BASIN: Roanoke
REPORT TO: Chatt. Dist.
ARO PRO. MRO (RO) WORO WIRO, WSKO, BM, TS.
OTHER:
COLLECTOR(S): Pevada & Godwin
BOD RANGE: _____ SEED: _____
CHLORINATED: _____

SAMPLE TYPE:
 AMBIENT CORE COMPLIANCE
 INTENSIVE S. SPLIT EMERGENCY

STATION LOCATION: Sa the wood Piedmont Dist. in R. 1001

REMARKS: La-14-11

Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type	Sample Type	Composite
						A H L	C G GNXX	T S
1	82/03/26	10:30						
2	BODs 310	mg/l	Chloride 940	mg/l	NH ₃ as N 610	mg/l	Mo - Molybdenum 1062	
3	COD-High 340	mg/l	✓ Arsenic-Inorganic 1002	24 ug/l	TKN as N 625	mg/l	Na - Sodium 929	
4	COD-Low 335	mg/l	Chl a: Tri 32217	ug/l	NO ₂ +NO ₃ as N 630	mg/l	Ni - Nickel 1067	< 1.00 ug/l
5	Coliform:MF Fecal 31616	/100ml	Chl a: Corr 32209	ug/l	PO ₄ as P 70507	mg/l	✓ Pb - Lead 1031	100 ug/l
6	Coliform:MF Total 31504	/100ml	Phosphytin a 32213	ug/l	P: Total as P 665	mg/l	Sb - Antimony 1097	
7	Coliform:Tube Fecal 31615	/100ml	Color: True 90	Pt-Co	P: Dissolved as P 666	mg/l	Sn - Tin 1102	
8	Coliform:Tube Total 31505	/100ml	Chromium:Hex. 1032	ug/l	Ag - Silver 1077	ug/l	V - Vanadium 1087	
9	Residue: Total 500	mg/l	Cyanide 720	mg/l	Al - Aluminum 1105	ug/l	✓ Zn - Zinc 1092	70 ug/l
10	Volatile 505	mg/l	Fluoride 951	mg/l	Ba - Barium 1007	ug/l	Pesticides (Specify)	
11	Fixed 510	mg/l	Formaldehyde 71880	mg/l	Be - Beryllium 1012	ug/l		
12	Residue: Suspended 530	mg/l	Grease and Oils 556	mg/l	Ca - Calcium 916	mg/l		
13	Volatile 535	mg/l	Hardness: Total 900	mg/l	✓ Cd - Cadmium 1027	< 50 ug/l		
14	Fixed 540	mg/l	MBAS 38260	mg/l	✓ Co - Cobalt 1037	< 100 ug/l	✓ Organics (Specify)	See
15	pH 403	units	Phenols 32730	ug/l	✓ Chromium: Total 1034	< 90 ug/l		
16	Acidity to pH 4.5 436	mg/l	Sulfate 945	mg/l	✓ Cu - Copper 1042	80 ug/l		
17	Acidity to pH 8.3 435	mg/l	Sulfide 745	mg/l	✓ Fe - Iron 1045	10,000 ug/l		
18	Alkalinity to pH 8.3 415	mg/l	Specific Cond. 95	uMhos/cm	✓ Hg - Mercury 71900	omit		
19	Alkalinity to pH 4.5 410	mg/l	Biomass: Dry Wt. 573	g/M	Li - Lithium 1132	ug/l		
20	TQC 680	mg/l	Biomass: Peri Ash Frge 572	g/M	✓ Mg - Magnesium 927	18 mg/l		
	Turbidity 76	NTU	Chl a: Peri Fluoro 82547	mg/M	✓ Mn - Manganese 1055	2200 ug/l		

Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	Alkalinity		Acidity	
					pH 8.3	pH 4.5	pH 4.5	pH 8.3
A PT 63	10	300	400	94	82244	431	82243	82242
B Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity %	Algae: Floating Mats Severity	Precipitation (In/Day)	Cloud Cover: %	Wind Direction (Deg.)	Wind force Beaufort
78	20	301	480	1325	45	32	36	37
C 1 Hr Settling Matter (ml/1 Hr)	Dead Fish Severity	Turbidity Severity	Odor: Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
50086	1340	1350	1330	1351	1305	1300	1345	1315

ed by JS

Date 11/11/87

checked by MD

ORGANIC ANALYSIS

Supervisor REK

Entered by _____

Checked by _____

Lab No. 1499 Water Analytical Results

The following compounds were identified by matching to library mass spectra. They were not matched to standards:

- Dihydroacemaphthylene
- Fluorene HW
- Phenanthrene
- Fluoranthene
- Phenol
- Methyl phenol
- Dimethyl phenol
- Ethyl methyl phenol
- Propenyl phenol
- Methyl Benzoquinone
- Methyl Benzoic acid
- Tetrachloro phenol
- Pentachloro phenol
- Naphthalene carboxylic Acid
- Quinoline
- Benzene carcinogen HS HW PTP on shot.
- Toluene HS HW PTP

3 unidentified peaks detected by GC/MS

✓ GC/MS/DS used

COUNTY: Washington
 RIVER/BASIN: Popo
 REPORT TO: (Circle One)
 ARO: WSRO, MRO, FRO, WORO, WIRO, RRO, JS, BM,
 AM: OTHER:
 COLLECTOR: John ...

N.C. DEPT. OF NATURAL RESOURCES AND COMMUNITY DEVELOPMENT

DIVISION OF ENVIRONMENTAL MANAGEMENT

FIELD/LAB FORM

SEDIMENT/TISSUE

<input checked="" type="checkbox"/> SEDIMENT	<input type="checkbox"/> AMBIENT	<input type="checkbox"/> CORE
<input type="checkbox"/> TISSUE	<input type="checkbox"/> COMPLIANCE	<input type="checkbox"/> SPLIT
	<input checked="" type="checkbox"/> INTENSIVE S.	<input type="checkbox"/> EMERGENCY

LAB NUMBER: 1200
 DATE RECEIVED: 4-22-03
 RECEIVED BY: AMW
 DATA ENTRY BY: ... CK: ...
 DATE REPORTED: 4-29-03

STATION LOCATION: OSPA, Obidham Property, ...

REMARKS: ...

Station Number	Date Begin	Time Begin	Date End	Time End	Depth DM DB DMB	Value Type	T, S, or B	Sample Type
<u>WILE 2</u>	<u>82-03-20</u>	<u>1100</u>				<u>A H L</u>		<u>C G GNXX</u>

	Tissue	Units	Sediment	Units	Tissue	Units	Sediment	Units	Tissue	Units	Sediment	Units
1	01064 As	mg/Kg	01003 As	5.6 mg/Kg			00611 NHg	mg/Kg	30482 Methoxychlor	ug/Kg	30481 Methoxychlor	ug/Kg
2	81666 Al	mg/Kg	01108 Al	68 mg/Kg			00627 TKN as N	mg/Kg	34688 HexChlorobenzene	mg/Kg	39701 HexChlorobenzene	ug/Kg
3	71940 Cd	mg/Kg	01028 Cd	<50 mg/Kg			00633 NO2 & NO3	mg/Kg	39060 PCP	ug/g	39061 PCP	ug/Kg
4	71938 Cr: tot.	mg/Kg	01029 Cr: tot.	18 mg/Kg			00668 P: tot. as P	mg/Kg	39074 alpha-BHC	ug/g	39076 alpha-BHC	ug/Kg
5	71937 Cu	mg/Kg	01043 Cu	25 mg/Kg			70511 PO4 as P	mg/Kg	39075 gamma-BHC	ug/g	3981 gamma-BHC	ug/Kg
6	81660 Fe	mg/Kg	01170 Fe	18000 mg/Kg	34890 Aldrin	mg/Kg	39333 Aldrin	mg/Kg	34685 Endrin	mg/Kg	39383 Endrin	ug/Kg
7	71930 Hg	mg/Kg	71921 Hg	.09 mg/Kg	34684 Dieldrin	mg/Kg	39383 Dieldrin	mg/Kg	39515 PCB	mg/Kg	39519 PCB	ug/Kg
8	81666 Mg	mg/Kg	00924 Mg	6.8 mg/Kg	39325 o,p DDD	ug/g	39316 o,p DDD	ug/Kg	<input checked="" type="checkbox"/> Others:		Others:	
9	01069 Ni	mg/Kg	01068 Ni	15 mg/Kg	39312 p,p DDD	ug/g	39311 p,p DDD	ug/Kg	ORGANIC			
10	71935 Pb	mg/Kg	01052 Pb	22 mg/Kg	39328 o,p DDE	ug/g	39328 o,p DDE	ug/Kg	SCAN			
11	71938 Zn	mg/Kg	01093 Zn	43 mg/Kg	39322 p,p DDE	ug/g	39321 p,p DDE	ug/Kg	Chloroate			
12	Other Metals:	mg/Kg	Other Metals:	mg/Kg	39290 Total DDT	ug/g	39373 Total DDT	ug/Kg				
13		mg/Kg		mg/Kg	39318 o,p DDT	ug/g	39306 o,p DDT	ug/Kg				
14		mg/Kg		mg/Kg	39302 p,p DDT	ug/g	39301 p,p DDT	ug/Kg				
15		mg/Kg		mg/Kg	39063 cis-Chlordane	ug/g	39064 cis-Chlordane	ug/Kg				
16		mg/Kg		mg/Kg	39066 trans-Chlordane	ug/g	39067 trans-Chlordane	ug/Kg				
17		mg/Kg		mg/Kg	39069 cis-N-chlor	ug/g	39070 cis-N-chlor	ug/Kg				
18		mg/Kg		mg/Kg	39072 trans-N-chlor	ug/g	39073 trans-N-chlor	ug/Kg				

Sampling Point	Temperature °C	Dissolved Oxygen	pH Units	Conductivity	Salinity ‰	Turbidity FTU	Stream Color	Secchi (M)
A P1	10	300	600	95	70305	78		78
R P	Stream Stage ft:	Flow MGD	Floating Debris Sever.	Sludge Severity	Detergent Suds Sever.	Atmos. Odor Severity	Cloud Cover ‰	Wind Dir. from North
B B 647	65	50051	1345	1315	1305	1330	32	36

Supervisor REK

Entered by

Checked by

Lab No. Sediment Analytical Results

1500 The following compounds were identified by matching to library mass spectra. They were not matched to standards:

- Chlorophenol
- Tetrachlorophenol
- Dichlorophenol
- Pentachlorophenol
- Naphthalene #S HW PTP
- Methyl Naphthalene
- Dibenzofuran
- Fluorene
- Phenanthrene
- Fluoranthene
- Pyrene

GC/MS/DS used

COUNTY: San Diego

RIVER BASIN: San Pedro

REPORT TO: (Circle One)

ARO, FRO, MRO, RRO, WARO, WIRO, WSRO, BM, TS,

OTHER:

COLLECTOR(S): Lars Erlund & TR P...

BOD RANGE: SEED:

CHLORINATED:

DEVELOPMENT

DIVISION OF ENVIRONMENTAL MANAGEMENT
WATER QUALITY FIELD-LAB FORM (DM1)

3

SAMPLE TYPE

- AMBIENT
- CORE
- COMPLIANCE
- INTENSIVE S.
- SPLIT
- EMERGENCY

STATION LOCATION: Southern Treatment Plant

REMARKS: in ch...

LAB NUMBER 00008: 12001

DATE RECEIVED: 3/2/81

RECEIVED BY: [Signature]

DATA ENTRY BY: [Signature] CK: [Signature]

DATE REPORTED: 3-28-81

Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type			Sample Type			Composite						
						A	H	L	C	G	GNXX	T	S	B				
1		1010																
2	BODs 310	mg/l	Chloride 940	mg/l	NH3 as N 610	mg/l				Mo - Molybdenum 1062	ug							
3	COD-High 340	mg/l	Arsenic: Inorganic 997	ug/l	TKN as N 625	mg/l				Ng - Sodium 929	mg							
4	COD-Low 335	mg/l	Chl a: Trl 32210	ug/l	NO2*NO3 as N 630	mg/l				Ni - Nickel 1067	ug/l							
5	Coliform: MF Fecal 31616	/100ml	Chl a: Corr 32211	ug/l	PO4 as P 70507	mg/l				Pb - Lead 1051	ug/l							
6	Coliform: MF Total 31504	/100ml	Phosphytin a 32218	ug/l	P: Total as P 665	mg/l				Sb - Antimony 1097	ug/l							
7	Coliform: Tube Fecal 31615	/100ml	Color: True 80	Pt-Co	P: Dissolved as P 666	mg/l				Sn - Tin 1102	ug/l							
8	Coliform: Tube Total 31505	/100ml	Chromium: Hex. 1032	ug/l	Ag - Silver 1077	ug/l				V - Vanadium 1087	ug/l							
9	Residue: Total 500	mg/l	Cyanide 720	mg/l	Al - Aluminum 1105	ug/l				Zn - Zinc 1092	ug/l							
10	Volatile 505	mg/l	Fluoride 951	mg/l	Ba - Barium 1007	ug/l				Pesticides (Specify)								
11	Fixed 510	mg/l	Formaldehyde 71880	mg/l	Be - Beryllium 1012	ug/l												
12	Residue: Suspended 530	mg/l	Grease and Oils 556	mg/l	Ca - Calcium 916	mg/l												
13	Volatile 535	mg/l	Hardness: Total 900	mg/l	Cd - Cadmium 1027	ug/l												
14	Fixed 540	mg/l	MBAS 38260	mg/l	Co - Cobalt 1037	ug/l				Organics (Specify)								
15	pH 403	units	Phenols 32730	ug/l	Cr - Chromium: Total 1034	ug/l												
16	Acidity to pH 4.5 436	mg/l	Sulfate 945	mg/l	Cu - Copper 1042	ug/l												
17	Acidity to pH 8.3 435	mg/l	Sulfide 745	mg/l	Fe - Iron 1045	ug/l												
18	Alkalinity to pH 8.3 415	mg/l	Specific Cond. 95	uMhos/cm	Hg - Mercury 71900	ug/l												
19	Alkalinity to pH 4.5 410	mg/l	Biomass: Dry Wt. 573	g/M	Li - Lithium 1132	ug/l												
20	TOC 680	mg/l	Biomass: Peri Ash Free 572	g/M	Mg - Magnesium 927	mg/l												
	Turbidity 76	NTU	Chl a: Peri Spectro 32228	mg/M	Mn - Manganese 1055	ug/l												

A	Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	Alkalinity		Acidity	
						pH 8.3	pH 4.5	pH 4.5	pH 8.3
	63	10	300	400	94	82244	431	82243	82242
B	Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity ‰	Algae: Floating Mats Severity	Precipitation (In/Day)	Cloud Cover: %	Wind Direction (Deg.)	Wind Force Beaufort
	78	20	301	480	1325	45	37	36	37
C	1 Hr. Setttable Matter (ml/1Hr)	Dead Fish Severity	Turbidity Severity	Odor: Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
	50086	1340	1350	1330	1351	1305	1300	1345	1315

by

PTD

ORGANIC ANALYSIS

revisor

REK

Entered by Am

Checked by _____

Lab No.

WATER

Analytical Results

501

The following compounds were identified by matching to library mass spectra. They were not matched to standards:

~~Phenol~~

Phenol

methyl phenol

Benzoic acid

Hydroxy-methoxy-Benzaldehyde

Glucuronic propionic acid

Dichlorophenol

Pentafluorophenol

Fluoranthrene

Pyrene

2 unidentified peaks detected by GC/MS

No volatiles detected by GC/MS

N.C. DEPT. OF NATURAL RESOURCES & COMMUNITY DEVELOPMENT

COUNTY: Chatham

RIVER BASIN: Cape Fear

REPORT ID: (Circle One) _____

ARO, FRO, MRO, (RRD) WORO WIRO, WSRO, BM, TS, _____

OTHER: _____

COLLECTOR(S): Found to Gndw

BOD RANGE _____ SEED: _____

CHLORINATED: _____

DIVISION OF ENVIRONMENTAL MANAGEMENT
WATER QUALITY FIELD-LAB FORM (DM1)

SAMPLE TYPE

- AMBIENT CORE COMPLIANCE
 INTENSIVE S. SPLIT EMERGENCY

STATION LOCATION: Drainage Ditch

REMARKS: Southern Canal Discharge

LAB NUMBER 00008: 1502

DATE RECEIVED: 8/20/26

RECEIVED BY: H. J. ...

DATA ENTRY BY: _____ CK: _____

DATE REPORTED: 1-25-2

4

Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type			Sample Type			Composite						
						A	H	L	C	G	GNXX	T	S	B				
Sample 4	8/20/26	11:30																
1	BODs 310	mg/l	Chloride 940	mg/l	NH ₃ as N 610	mg/l	Mo - Molybdenum 1062	ug										
2	COD-High 840	mg/l	✓ Arsenic-Inorganic 1002	10 ug/l	TKN as N 625	mg/l	Na - Sodium 929	mg/l										
3	COD-Low 335	mg/l	Chl a: Tri 32217	ug/l	NO ₂ +NO ₃ as N 630	mg/l	✓ Ni - Nickel 1067	4100 ug/l										
4	Coliform:MF Fecal 31616	/100ml	Chl a: Corr 32209	ug/l	PO ₄ as P 70507	mg/l	✓ Pb - Lead 1051	100 ug/l										
5	Coliform:MF Total 31504	/100ml	Phaeophytin a 32213	ug/l	P: Total as P 665	mg/l	Sb - Antimony 1097	ug/l										
6	Coliform:Tube Fecal 31615	/100ml	Color:True 80	Pt-Co	P: Dissolved as P 666	mg/l	Sn - Tin 1102	ug/l										
7	Coliform:Tube Total 31505	/100ml	Chromium:Hex. 1032	ug/l	Ag - Silver 1077	ug/l	V - Vanadium 1087	ug/l										
8	Residue: Total 500	mg/l	Cyanide 720	mg/l	Al - Aluminum 1105	ug/l	✓ Zn - Zinc 1092	50 ug/l										
9	Volatile 505	mg/l	Fluoride 951	mg/l	Ba - Barium 1007	ug/l	Pesticides (Specify)											
10	Fixed 510	mg/l	Formaldehyde 71880	mg/l	Be - Beryllium 1012	ug/l												
11	Residue:Suspended 530	mg/l	Grease and Oils 556	mg/l	Ca - Calcium 916	mg/l												
12	Volatile 535	mg/l	Hardness:Total 900	mg/l	✓ Cd - Cadmium 1027	<50 ug/l												
13	Fixed 540	mg/l	MBAS 38260	mg/l	✓ Co - Cobalt 1037	<100 ug/l	✓ Organics (Specify)	Scan										
14	pH 403	units	Phenols 32730	ug/l	✓ Chromium:Total 1034	<50 ug/l	Phenols											
15	Acidity to pH 4.5 436	mg/l	Sulfate 945	mg/l	✓ Cu - Copper 1042	40 ug/l	Iron											
16	Acidity to pH 8.3 435	mg/l	Sulfide 745	mg/l	✓ Fe - Iron 1045	14000 ug/l	Volatiles											
17	Alkalinity to pH 8.3 415	mg/l	Specific Cond. 95	uMhos/cm	✓ Hg - Mercury 1080	0.01 ug/l	Calcium											
18	Alkalinity to pH 4.5 410	mg/l	Biomass: Dry Wt. 573	g/M	Li - Lithium 1132	ug/l												
19	IOC 680	mg/l	Biomass: Peri Ash Free 572	g/M	✓ Mg - Magnesium 927	2.1 mg/l												
20	Turbidity 76	NTU	Chl a: Peri Fluro 82547	mg/M	✓ Mn - Manganese 1055	1600 ug/l												

A	Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	Alkalinity		Acidity	
						pH 8.3	pH 4.5	pH 4.5	pH 8.3
	PT 2	10	300	400	94	82244	431	82243	82242
	Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity ‰	Algae: Floating Mats Severity	Precipitation (In/Day)	Cloud Cover: %	Wind Direction (Deg.)	Wind Force Beaufort
B	78	20	301	480	1325	45	32	36	37
C	1 Hr. Settling Matter (ml/1 Hr.)	Dead Fish Severity	Turbidity Severity	Odor: Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
	50086	1340	1350	1330	1351	1305	1300	1345	1315

10
FTD

revisor REK

ORGANIC ANALYSIS

Entered by fm

Checked by _____

Lab No.

Water

Analytical Results

1502

The following compounds were identified by matching to library mass spectra - They were not matched to standards.

Naphthalene

Methyl naphthalene

Dimethyl naphthalene + undecane

dihydro acenaphthylene

dibenzofuran

Trimethyl naphthalene

- octa decane

fluorene

phenanthrene

methyl phenanthrene

fluoranthrene

pyrene

benzofluorene

chrysene

benz[a]anthracene

tetrachlorophenol

pentachlorophenol

4H-cyclopenta[DEF]phenanthrene

Naphthalene carboxylic acid

Acetic Acid ethyl ester

Methyl pentane

Dimethyl Butane

Methyl Benzene (Toluene)

Trimethyl Bicyclo Heptane

Dihydro Indene

RIVER BASIN: Fed

REPORT TO: (Circle One)

ARO, FRO, MRO, RRO, WARO, WIRO, WSRO, BM, TS,

OTHER:

COLLECTOR(S): J. P. ...

BOD RANGE: _____ SEED: _____

CHLORINATED: _____

DIVISION OF ENVIRONMENTAL MANAGEMENT
WATER QUALITY FIELD-LAB FORM (DM1)

SAMPLE TYPE

- AMBIENT CORE COMPLIANCE
 INTENSIVE S. SPLIT EMERGENCY

STATION LOCATION: Local ...

REMARKS: ...

LAB NUMBER: 0000
DATE RECEIVED: ...
RECEIVED BY: ...
DATA ENTRY BY: ... CK: ...
DATE REPORTED: _____

Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type A H L	Sample Type C G GNXX	Composite I S B
1	03/17/81	1145						
2								
3								
4								
5								
6								
7								
8								
9								
10								
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97								
98								
99								
100								

Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	pH 8.3	Alkalinity pH 4.5	pH 4.5	Acidity pH 8.3
PT 2	10	300	400	94	82244	431	82243	82242
Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity ‰	Algae/Floating Mats Severity	Precipitation (In/Day)	Cloud Cover: %	Wind Direction (Deg.)	Wind Force Beaufort
78	20	301	480	1325	45	32	36	37
1 Hr. Settleable Matter (ml/100ml)	Dead Fish Severity	Turbidity Severity	Odor, Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
50086	1340	1350	1330	1351	1305	1300	1345	1315

Lab No.

Water Analytical Results

1503 The following compounds were identified by matching to library mass spectra. They were not matched to stds

- tetrachlorophenol
- pentachlorophenol
- ortho cresol

3 unidentified peaks detected by GC/MS

1504 The following compound was identified by matching to library mass spectra. It was not matched to stds

Trichloro, Trifluoro, ethane

one unidentified peak detected by GC/MS

Sediment

1505 The following compounds were identified by matching to library mass spectra. They were not matched to standards

- Phenanthrene
- Fluoranthene
- Pyrene
- Benzo [A] anthracene
- Chrysene
- Benzo [K] Fluoranthene
- Pentachlorophenol

N.C. DEPT. OF NATURAL RESOURCES & COMMUNITY DEVELOPMENT

COUNTY: Chatham

RIVER BASIN: Cape Fear

REPORT TO: (Circle One)

ARO, FRO, MRO, WRO, WORO, WISRO, BM, TS

OTHER:

COLLECTOR(S): Fuchs & Colwell

BOD RANGE: SEED:

CHLORINATED:

DIVISION OF ENVIRONMENTAL MANAGEMENT
WATER QUALITY FIELD-LAB FORM (DM1)

SAMPLE TYPE

- AMBIENT CORE COMPLIANCE
 INTENSIVE S SPLIT EMERGENCY

STATION LOCATION: Little Cedar Creek

REMARKS: 100 yds up stream of confluence with Little

LAB NUMBER 00008: 1504
DATE RECEIVED: 8/20/82
RECEIVED BY: AMW
DATA ENTRY BY: CK
DATE REPORTED:

Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type			Sample Type			Composite		
						A	H	L	C	G	GNXX	T	S	
1	82	03	26	12:45										
2	BODs 310	mg/l	Chloride 940	mg/l	NH ₃ as N 610	mg/l	Mo - Molybdenum 1062							
3	COD-High 340	mg/l	Arsenic: Inorganic 4002	ug/l	TKN as N 625	mg/l	Na - Sodium 929							
4	COD-Low 335	mg/l	Chl a: Tri 32217	ug/l	NO ₂ +NO ₃ as N 630	mg/l	Ni - Nickel 1067	2100	ug/l					
5	Coliform: MF: Fecal 31616	/100ml	Chl a: Corr 32209	ug/l	PO ₄ as P 70507	mg/l	Pb - Lead 1051	100	ug/l					
6	Coliform: MF: Total 31504	/100ml	Pheophytin a 32213	ug/l	P: Total as P 665	mg/l	Sb - Antimony 1097							
7	Coliform: Tube Fecpl 31615	/100ml	Color: True 80	Pl-Co	P: Dissolved as P 666	mg/l	Sn - Tin 1102							
8	Coliform: Tube Total 31505	/100ml	Chromium: Hex. 1032	ug/l	Ag - Silver 1077	ug/l	V - Vanadium 1087							
9	Residue: Total 500	mg/l	Cyanide 720	mg/l	Al - Aluminum 1105	ug/l	Zn - Zinc 1092	450	ug/l					
10	Volatile 505	mg/l	Fluoride 951	mg/l	Ba - Barium 1007	ug/l	Pesticides (Specify)							
11	Fixed 510	mg/l	Formaldehyde 71880	0.1 mg/l	Be - Beryllium 1012	ug/l								
12	Residue: Suspended 530	mg/l	Grease and Oils 556	mg/l	Ca - Calcium 916	mg/l								
13	Volatile 535	mg/l	Hardness: Total 900	mg/l	Cd - Cadmium 1027	ug/l	450							
14	Fixed 540	mg/l	MBAS 38260	mg/l	Co - Cobalt 1037	ug/l	2100							
15	pH 403	units	Phenols 32730	ug/l	Cr - Chromium: Total 1034	ug/l	450							
16	Acidity to pH 4.5 436	mg/l	Sulfate 945	mg/l	Cu - Copper 1042	ug/l	440							
17	Acidity to pH 8.3 435	mg/l	Sulfide 745	mg/l	Fe - Iron 1045	ug/l	700							
18	Alkalinity to pH 8.3 415	mg/l	Specific Cond. 95	uMhos/cm	Hg - Mercury 71900	ug/l	4.2							
19	Alkalinity to pH 4.5 410	mg/l	Biomass: Dry Wt. 573	g/M	Li - Lithium 1132	ug/l								
20	IOC 680	mg/l	Biomass: Peri Ash Free 572	g/M	Mg - Magnesium 927	mg/l	5.6							
21	Turbidity 76	NTU	Chl a: Peri Fluor 82547	mg/M	Mn - Manganese 1055	ug/l	900							

A	Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	Alkalinity		Acidity	
						pH 8.3	pH 4.5	pH 4.5	pH 8.3
63	7	10	300	400	94	82244	431	82243	82242
B	Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity ‰	Algae: Floating Mats Severity	Precipitation (In/Day)	Cloud Cover: %	Wind Direction (Deg.)	Wind Force Beaufort
78		20	101	480	1325	45	32	36	37
C	1 Hr. Settleable Matter (ml/1Hr)	Dead Fish Severity	Turbidity Severity	Odor: Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
50086		1340	1350	1330	1351	1305	1300	1345	1315

Lab No.

Water

Analytical Results

1503

The following compounds were identified by matching to library mass spectra. They were not matched to stds

tetrachlorophenol
pentachlorophenol
anthracene

3 unidentified peaks detected by GC/MS

1504

The following compound was identified by matching to library mass spectra. It was not matched to stds

Trichloro, Trifluoro, ethane

one unidentified peak detected by GC/MS.

Sediment

1505

The following compounds were identified by matching to library mass spectra. They were not matched to standards

Phenanthrene

Fluoranthene

Pyrene

Benz [A] anthracene

Chrysene

Benz [K] Fluoranthene

Pentachlorophenol

N. C. DEPT. OF NATURAL RESOURCES AND COMMUNITY DEVELOPMENT

DIVISION OF ENVIRONMENTAL MANAGEMENT

FIELD/LAB FORM

SEDIMENT/TISSUE

<input checked="" type="checkbox"/> SEDIMENT	<input type="checkbox"/> AMBIENT	<input type="checkbox"/> CORE
<input type="checkbox"/> TISSUE	<input type="checkbox"/> COMPLIANCE	<input type="checkbox"/> SPLIT
	<input checked="" type="checkbox"/> INTENSIVE S.	<input type="checkbox"/> EMERGENCY

STATION LOCATION:

REMARKS:

LAB NUMBER: 1500

DATE RECEIVED: 11/3/2003

RECEIVED BY: [Signature]

DATA ENTRY BY: _____ CK: _____

DATE REPORTED: _____

SIN DATE FRY

ORT TO: (Circle One)

ARO, WSKO, MRO, FRO, WGR, WIRO, RRO, JS, BM,

AM. OTHER:

COLLECTOR: W. J. GARDNER & J. STOUNDS

Station Number	Date Begin	Time Begin	Date End	Time End	Depth DM DB DMB	Value Type	T, S, or B	Sample Type
						A H L		C G GNXX
<u>361</u>	<u>3/1/03</u>	<u>12:15</u>						

Tissue	Units	Sediment	Units	Tissue	Units	Sediment	Units	Tissue	Units	Sediment	Units
01004 As	mg/Kg	01003 As	3.2 mg/Kg	00611 NH3	mg/Kg	39482 Methoxychl	ug/Kg	39481 Methoxychl	ug/Kg	39701	ug/Kg
01666 Al	mg/Kg	01008 Al	130 mg/Kg	00627 IKN as N	mg/Kg	34688 Hxchlbenzene	mg/Kg	39061 Hxchlbenzene	ug/Kg	39074	ug/Kg
71940 Cd	mg/Kg	01028 Cd	<.50 mg/Kg	00633 NO2 & NO3	mg/Kg	39060 PCP	ug/g	39061 PCP	ug/Kg	39074	ug/Kg
71939 Cr:tot.	mg/Kg	01028 Cr:tot.	47 mg/Kg	00668 P:tot as P	mg/Kg	39074 alpha-BHC	ug/g	39074 alpha-BHC	ug/Kg	39074	ug/Kg
71937 Cu	mg/Kg	01043 Cu	4.5 mg/Kg	70511 PO4 as P	mg/Kg	39075 gamma-BHC	ug/g	39075 gamma-BHC	ug/Kg	39075	ug/Kg
81660 Fe	mg/Kg	01170 Fe	3300 mg/Kg	34680 Aldrin	mg/Kg	34685 Aldrin	mg/Kg	34685 Aldrin	ug/Kg	34685	ug/Kg
71930 Hg	mg/Kg	21821 Hg	.04 mg/Kg	34684 Dieldrin	mg/Kg	39316 Dieldrin	ug/Kg	39316 Dieldrin	ug/Kg	39316	ug/Kg
81656 Mg	mg/Kg	00924 Mg	6800 mg/Kg	39325 o,p DDD	ug/g	39316 o,p DDD	ug/Kg	39316 o,p DDD	ug/Kg	39316	ug/Kg
01068 Ni	mg/Kg	01068 Ni	78 mg/Kg	39312 p,p DDD	ug/g	39311 p,p DDD	ug/Kg	39311 p,p DDD	ug/Kg	39311	ug/Kg
71938 Pb	mg/Kg	01052 Pb	16 mg/Kg	39328 o,p DDE	ug/g	39328 o,p DDE	ug/Kg	39328 o,p DDE	ug/Kg	39328	ug/Kg
71938 Zn	mg/Kg	01093 Zn	48 mg/Kg	39322 p,p DDE	ug/g	39321 p,p DDE	ug/Kg	39321 p,p DDE	ug/Kg	39321	ug/Kg
Other Metals:	mg/Kg	Other Metals:	mg/Kg	39290 Total DDT	ug/g	39373 Total DDT	ug/Kg	39373 Total DDT	ug/Kg	39373	ug/Kg
	mg/Kg		mg/Kg	39318 o,p DDT	ug/g	39306 o,p DDT	ug/Kg	39306 o,p DDT	ug/Kg	39306	ug/Kg
	mg/Kg		mg/Kg	39302 p,p DDT	ug/g	39301 p,p DDT	ug/Kg	39301 p,p DDT	ug/Kg	39301	ug/Kg
	mg/Kg		mg/Kg	39063 cis-Chlordane	ug/g	39064 cis-Chlordane	ug/Kg	39064 cis-Chlordane	ug/Kg	39064	ug/Kg
	mg/Kg		mg/Kg	39066 trans-Chlordane	ug/g	39067 trans-Chlordane	ug/Kg	39067 trans-Chlordane	ug/Kg	39067	ug/Kg
	mg/Kg		mg/Kg	39068 cis-N'chlor	ug/g	39070 cis-N'chlor	ug/Kg	39070 cis-N'chlor	ug/Kg	39070	ug/Kg
	mg/Kg		mg/Kg	39072 trans-N'chlor	ug/g	39073 trans-N'chlor	ug/Kg	39073 trans-N'chlor	ug/Kg	39073	ug/Kg
	mg/Kg		mg/Kg								

Sampling Point	Temperature °C	Dissolved Oxygen	pH Units	Conductivity	Salinity ‰	Turbidity FTU	Stream Color	Secchi (M)
A B1	10	300	400	95	70305	78		78
B R P	Stream Stage ft.	Flow MGD	Floating Debris Sever.	Sludge Severity	Detergent Suds Sever.	Atmos. Odor Severity	Cloud Cover %	Wind Dir. from North
B 647	65	50051	1345	1315	1305	1330	32	36

Lab No.

Water Analytical Results

1503 The following compounds were identified by matching to library mass spectra. They were not matched to stds

- tetrachlorophenol
- pentachlorophenol
- anthracene

3 unidentified peaks detected by GC/MS

1504 The following compound was identified by matching to library mass spectra. It was not matched to stds

- Trichloro, Trifluoro, ethane

one unidentified peak detected by GC/MS.

1505

Sediment

The following compounds were identified by matching to library mass spectra. They were not matched to standards

- Phenanthrene
- Fluoranthene
- Pyrene
- Benzo [A] anthracene
- Chrysene
- Benzo [K] Fluoranthene
- Pentachlorophenol

N.C. DEPT. OF NATURAL RESOURCES & COMMUNITY DEVELOPMENT

COUNTY: _____

RIVER BASIN: _____

REPORT TO: (Circle One) _____

ARO, FRO, MRO, RRO, W_oRO WIRO, W_SRO, BM, TS,

OTHER: _____

COLLECTOR(S): _____

BOD RANGE: _____ SEED: _____

CHLORINATED: _____

DIVISION OF ENVIRONMENTAL MANAGEMENT
WATER QUALITY FIELD-LAB FORM (DM1)

SAMPLE TYPE

- AMBIENT CORE COMPLIANCE
 INTENSIVE S. SPLIT EMERGENCY

STATION LOCATION: _____

REMARKS: _____

LAB NUMBER 00048: 1506
DATE RECEIVED: 2/23/81
RECEIVED BY: _____
DATA ENTRY BY: _____
DATE REPORTED: _____

7

Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type			Sample Type			Composite	
						A	H	L	C	G	GNXX		T
1		1215											
2	BODs 310	mg/l	Chloride 940	mg/l	NH ₃ as N 610	mg/l			Mo - Molybdenum 1062	ug/l			
3	COD: High 340	mg/l	✓ Arsenic: Inorganic 997	ug/l	TKN as N 625	mg/l			Na - Sodium 929	mg/l			
4	COD: Low 335	mg/l	Chl a: Tri 32210	ug/l	NO ₂ *NO ₃ as N 630	mg/l			Ni - Nickel 1067	ug/l	<100		
5	Coliform: MF Fecal 31616	/100ml	Chl a: Corr 32211	ug/l	PO ₄ as P 70507	mg/l			Pb - Lead 1051	ug/l	100		
6	Coliform: MF Total 31504	/100ml	Phaeophytin a 32218	ug/l	P: Total as P 665	mg/l			Sb - Antimony 1097	ug/l			
7	Coliform: Tube Fecal 31615	/100ml	Color: True 80	Pt-Co	P: Dissolved as P 666	mg/l			Sn - Tin 1102	ug/l			
8	Coliform: Tube Total 31505	/100ml	Chromium: Hex. 1032	ug/l	Ag - Silver 1077	ug/l			V - Vanadium 1087	ug/l			
9	Residue: Total 500	mg/l	Cyanide 720	mg/l	Al - Aluminum 1105	ug/l			Zn - Zinc 1092	ug/l	<50		
10	Volatile 505	mg/l	Fluoride 951	mg/l	Ba - Barium 1007	ug/l			Pesticides (Specify)				
11	Fixed 510	mg/l	Formaldehyde 71880	mg/l	Be - Beryllium 1012	ug/l							
12	Residue: Suspended 530	mg/l	Grease and Oils 556	mg/l	Ca - Calcium 916	mg/l							
13	Volatile 535	mg/l	Hardness: Total 900	mg/l	Cd - Cadmium 1027	ug/l	<50						
14	Fixed 540	mg/l	MBAS 38260	mg/l	Co - Cobalt 1037	ug/l	<100		✓ Organics (Specify)				
15	pH 403	units	Phenols 32730	ug/l	Chromium: Total 1034	ug/l	<50						
16	Acidity to pH 4.5 436	mg/l	Sulfate 945	mg/l	Cu - Copper 1042	ug/l	<40						
17	Acidity to pH 8.3 435	mg/l	Sulfide 745	mg/l	Fe - Iron 1045	ug/l	6000						
18	Alkalinity to pH 8.3 415	mg/l	Specific Cond. 95	uMhos/cm ²	Hg - Mercury 71900	ug/l	0.4						
19	Alkalinity to pH 4.5 410	mg/l	Biomass: Dry Wt. 573	g/M ²	Li - Lithium 1132	ug/l							
20	IOC 680	mg/l	Biomass: Peri Ash Free 572	g/M ²	Mg - Magnesium 927	mg/l	66						
	Turbidity 76	NTU	Chl a: Peri Spectro 32228	mg/M ²	Mn - Manganese 1055	ug/l	700						

A	Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	Alkalinity		Acidity	
						pH 8.3	pH 4.5	pH 4.5	pH 8.3
	PT 2	10	300	400	94	82244	431	82243	82242
B	Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity %	Algae: Floating Mats Severity	Precipitation (In/Day)	Cloud Cover: %	Wind Direction (Deg.)	Wind Force Beaufort
	78	20	301	480	1325	45	32	36	37
C	1 Hr. Settleable Matter (ml/1Hr)	Dead Fish Severity	Turbidity Severity	Odor: Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
	50086	1340	1350	1330	1351	1305	1300	1345	1315

ed by PTD

ORGANIC ANALYSIS

Supervisor REK

Entered by pm

Checked by _____

Lab No.

Water

Analytical Results

1506

The following compounds were identified by matching to library mass spectra. They were not matched to standards:

Fluoranthene Hw + PTP PAHs not exceeding 2 ug/l
Pyrene
Chrysene
Hydroxy methyl, Pentamoxe
Tetra chlorophenol
Penta chloro phenol

three unidentified peaks detected by GC/MS

~~1506~~
1507

~~Acid-base analysis~~
~~Acid-base analysis~~
No Acid or Base Neutral species detected by GC/FTD

N.C. DEPT. OF NATURAL RESOURCES & COMMUNITY DEVELOPMENT

COUNTY: Chatham

RIVER BASIN: Upper Flint

REPORT TO: (Circle One)

ARO, FRO, MRO, (RRO) WORO WIRO, WSRO, BM, TS

OTHER:

COLLECTOR(S): D. J. ...

BOD RANGE: SEED:

CHLORINATED

DIVISION OF ENVIRONMENTAL MANAGEMENT
WATER QUALITY FIELD-LAB FORM (DM1)

SAMPLE TYPE

- AMBIENT CORE COMPLIANCE
 INTENSIVE S. SPLIT EMERGENCY

STATION LOCATION: L. 111 ... 100 yd ...

REMARKS: Compliance with ...

LAB NUMBER 00008: 87-03-2

DATE RECEIVED: 8.7.03.2

RECEIVED BY: ...

DATA ENTRY BY: CK

DATE REPORTED: ...



Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type A H L	Sample Type C G GNXX	Composite I S
1	08/03/20	12:30						
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								

Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	Alkalinity pH 8.3	Alkalinity pH 4.5	PH 4.5	Acidity PH 8.3
A PT 2	10	300	400	94	32244	431	82243	82242
B Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity ‰	Algae: Floating Mats Severity	Precipitation (In/Day)	Cloud Cover: %	Wind Direction (Deg.)	Wind Force Beaufort
78	20	301	480	1325	45	32	36	37
C 1 Hr. Settleable Matter (ml/1Hr)	Dead Fish Severity	Turbidity Severity	Odor: Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
50086	1340	1350	1330	1351	1305	1300	1345	1315

ed by PTD

ORGANIC ANALYSIS

Supervisor REK

Entered by pm

Checked by _____

Lab No. Water Analytical Results

1506 The following compounds were identified by matching to library mass spectra. They were not matched to standards:

- Fluoranthene Hw+ PTP PAHs not exceeding 2ug/l
- Pyrene
- Chrysene
- Hydroxy methyl Pentanone
- Tetra chlorophenol
- Penta chloro phenol

three unidentified peaks detected by GC/MS

1507

~~Acid or Base Neutral Organics detected by GC/MS~~
 No Acid or Base Neutral Organics detected by GC/MS

1053488557

Date: January 26, 1982

County: Chatham

Notifier's name and address: C. A. Council

P.O. Box 5447, Spartanburg, S.C. 29304

Contact's name: Mr. Charles Burdell *803) 576-7660

Site name and address: Southern Wood Piedmont

State Road 2139, Gulf, N.C. 27256

Site location: _____

Type of waste: Possible creosote, pentachlorophenol, copper chromic
arsenic sludges

What process generated the waste? Wood Preservation Treatment

Volume of waste: _____

Method of storage or disposal: on-site burial

Dates of waste activity: 1946 - 1980

Site history: C. A. Council notified that Southern Wood Piedmont Company buried creosote, pentachlorophenol, and copper chromic arsenic sludges on plant property between 1946 and 1980. The plant, located in Gulf, N.C., ceased operations in 1980.

*The preceding information is based on preliminary data supplied by the Environmental Protection Agency, and not on detailed site investigations.



P. O. Box 5447
Spartanburg, S. C. 29304

Phone 803/576-7660



Southern Wood Piedmont Company

11-M-1.10
December 15, 1981

Mr. Larry D. Perry
Division of Health Services
HAZARDOUS WASTE MANAGEMENT BRANCH
Box 2091
Raleigh, North Carolina 27602

RE: ACTION ON RCRA -- SUPERFUND

Dear Mr. Perry:

The attached information, which you requested on the closed Gulf plant, is self-explanatory.

If you have any questions, please let me know.

Very truly yours,

SOUTHERN WOOD PIEDMONT COMPANY

C. A. Burdell
Director
Technical Services

CAB:kwm

Attachments



Southern Wood Piedmont Company

11-M-1.10
June 4, 1981

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region IV - Sites Notification
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Gentlemen:

Enclosed are Superfund notification forms for Southern Wood Piedmont Company's eight sites in the Southeastern United States. We have tried to provide you with the most accurate information available on these forms.

The volumes of buried waste are estimates based on what our long-term employees remember about the various sites involved. All the volumes are calculated using a concentration factor of 20% actual waste. Therefore, the figures reported are for 100% concentration.

Our wood-treating plants are engaged in long-term wood preservation. Our products include crossties, switchties, utility poles, lumber, bridge timber, crossarms and industrial floorblock. Preservatives used are coal tar creosote, pentachlorophenol in diesel fuel, and chromated copper arsenate (CCA).

If you have any additional questions, please let us know.

Sincerely,

SOUTHERN WOOD PIEDMONT COMPANY

C. A. Burdell
Director
Environmental Affairs

CAB:kwm

cc: (w/o Enc.) C. A. Council
C. E. Martin
H. I. Warrington
M. A. Roldan
M. T. Breen - Atlanta
R. H. Watts - Stamford
E. F. Button - Stamford

Enclosures

EPA Notification of Hazardous Waste Site

United States
Environmental Protection
Agency
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name ITT Rayonier, Inc.
Street P. O. Box 45165
City Atlanta State GA Zip Code 30320

Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site Southern Wood Piedmont Company
Street 2139 State Road
City Gulf County Chatham State NC Zip Code 27256

Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title) Burdell, Charles-Dir. Environmental Affairs
Phone 404/996-1460

Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year) 1946 To (Year) 1980

Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. Organics
2. Inorganics
3. Solvents
4. Pesticides
5. Heavy metals
6. Acids
7. Bases
8. PCBs
9. Mixed Municipal Waste
10. Unknown
11. Other (Specify)

Source of Waste:
Place an X in the appropriate boxes.

1. Mining
2. Construction
3. Textiles
4. Fertilizer
5. Paper/Printing
6. Leather Tanning
7. Iron/Steel Foundry
8. Chemical, General
9. Plating/Polishing
10. Military/Ammunition
11. Electrical Conductors
12. Transformers
13. Utility Companies
14. Sanitary/Refuse
15. Photofinish
16. Lab/Hospital
17. Unknown
18. Other (Specify)

Wood Preserving

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

K001
II-051

Notification of Hazardous Waste Site

Side Two

Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

- 1. Piles
- 2. Land Treatment
- 3. Landfill
- 4. Tanks
- 5. Impoundment
- 6. Underground Injection
- 7. Drums, Above Ground
- 8. Drums, Below Ground
- 9. Other (Specify) _____

Total Facility Waste Amount

cubic feet 7,512

gallons _____

Total Facility Area

square feet _____

acres 0.082

Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

- Known
- Suspected
- Likely
- None
- Possibility

Note: Items Hand I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name C. A. Council
Vice President, Chief Operating Officer
 Southern Wood Piedmont Company
 Street P. O. Box 5447
 City Spartanburg State SC Zip Code 29304
 Signature C.A. Council Date 6/5/81

- Owner, Present
- Owner, Past
- Transporter
- Operator, Present
- Operator, Past
- Other

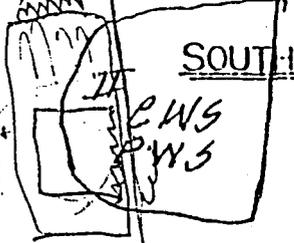
SOUTHERN WOOD PIEDMONT COMPANY

GENERAL CREOSOTING DIVISION

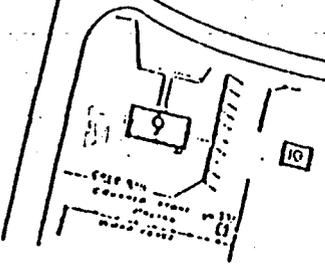
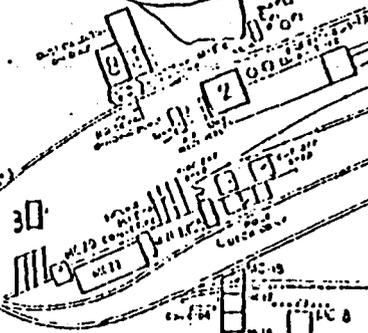
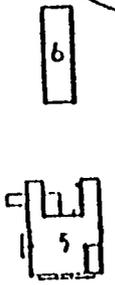
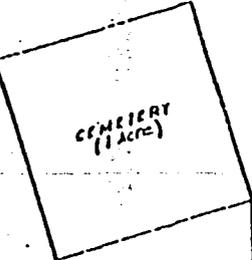
GULF NORTH CAROLINA

152-3150
REVISED

Area - 81.55 Acres
Cyls - 1-6'x137; 1-6'x142; 1-6'x85
1-6'x150 - 17577 C.F. 17577
Cranes - 2 - Army D.E.; 1 - Ohio
Pres - Credo, P. 175



CWS I



COUNTY ROAD

152-3150

ENVIRONMENTAL PROTECTION AGENCY
 NOTIS DATA MANAGEMENT SYSTEM

PAGE: 40

NOTIS REPORT #4

LISTING BY FACILITY
 REGION: 04 STATE: NC

REPORT DATE: 10/20/81

NOTIFICATION ID NO.	SITE NAME SITE STREET SITE CITY SITE COUNTY EPA SITE ID NO.	NOTIFIER NAME NOTIFIER STREET NOTIFIER CITY (CONTACT NAME/TITLE) (CONTACT PHONE)	STATE	ZIP	NOTIFIER STATUS (PRES OWN, PAST OWN TRANSPORTER, VOLUNTEER)
NCS000001054	SOUTHERN HOOD PIEDMONT CO 2139 STATE RD GULF 27256 CHATHAM NCD053488557	C.A. COUNCIL P.O. BOX 5447 SPARTANBURG (BURDELL, CHARLES, DIR/ENV AFF) (404-996-1400)	SC	29304	PRES OWN

RELEASES TO THE ENVIRONMENT:

DATES OF WASTE HANDLING: 1946 TO 1980

WASTE AMOUNT: 7,512 CU FT AREA: 1 ACRES MAP PRESENT: YES FORM TYPE: 8900-1

NOTIF. POSTMARKED DATE: 81/06/09 SIGNATURE PRESENT: YES DATE OF LAST UPDATE: 81/10/14

TYPE OF FACILITY	TYPES OF WASTES	SOURCES OF WASTE
LANDFILL	BOTTOM SED SLUDGE FM WOOD TREATING PROC CRESOTE ORGANICS PESTICIDES	OTHER-(SEE COMMENTS)

COMMENTS SEQ NO.

SEE FILE 1
 WOOD PRESERVING 400

P.40



Southern Wood Piedmont Company

11-M-1.4.8
November 19, 1980

Mr. Stan Taylor
Regional Engineer
Water Quality Section
N.C. DEPARTMENT OF NATURAL
RESOURCES & COMMUNITY DEVELOPMENT
P. O. Box 27687
Raleigh, North Carolina 27611

Dear Mr. Taylor:

I would like to inform you that Southern Wood Piedmont Company has successfully concluded the evaporation of all water in the water pollution control project at our plant in Gulf, North Carolina. After this evaporation, the water pollution system has been closed and landscaped.

Most of the other plant facilities have been removed. Our demolition contractor expects to be finished by the end of December. By that time, the rest of the plant site will be landscaped. We plan to plant grass and trees over this whole area.

We would like to thank you and your department for the cooperation we received on the addendum to our Permit No. 3931, allowing us to use additional evaporation measures. Now that this water pollution project is no longer needed, we will be allowing this permit to lapse.

Thank you again for your cooperation. If you have any questions, please do not hesitate to give us a call.

Sincerely yours,

SOUTHERN WOOD PIEDMONT COMPANY

Joe Morgan III
Environmental Manager

JMIII:kwf

cc: Mr. L. G. Hope
Mr. C. A. Burdell - Atlanta
Mr. M. T. Breen - Atlanta
Mr. D. G. Wright

Chatham Co.
w

DIVISION OF ENVIRONMENTAL MANAGEMENT

August 20, 1980

Mr. Joe Morgan, Environmental Manager
Southern Wood Piedmont Company
P.O. Box 5447
Spartanburg, South Carolina 29304

SUBJECT: Permit No. 3931-R
Southern Wood Piedmont Company
Gulf, North Carolina
Chatham County

Dear Mr. Morgan:

In accordance with your application received August 8, 1980, we are forwarding herewith Permit No. 3931-R, dated August 20, 1980, to Southern Wood Piedmont Company for the construction and operation of the subject non-discharge type waste treatment facilities.

This permit shall be effective from the date of issuance until rescinded, and shall be subject to the conditions and limitations as specified therein.

If any parts, requirements, or limitations contained in this permit are unacceptable to you, you have the right to an adjudicatory hearing before a hearing officer upon written demand to the Director within thirty (30) days following receipt of this permit, identifying the specific issues to be contended. Unless such demand is made, this permit shall be final and binding.

One (1) set of approved plans and specifications is being forwarded to you.

Yours very truly,
Original Signed by
L. P. BENTON, JR.
[Signature]
Neil S. Grigg, Director
Division of Environmental Management

Enclosures
cc: Chatham County Health Department
Mr. Stan Taylor Regional Supervisor
Mr. A. C. Turnage, Jr.
Raleigh Regional Office Manager

EST:tes
DST / 8-21-80



NORTH CAROLINA

ENVIRONMENTAL MANAGEMENT COMMISSION

DEPARTMENT OF NATURAL RESOURCES & COMMUNITY DEVELOPMENT

RALEIGH

P E R M I T

For the Discharge of Sewage, Industrial Wastes, or Other Wastes

In accordance with the provisions of Article 21 of Chapter 143, General Statutes of North Carolina as amended, and other applicable Laws, Rules and Regulations

PERMISSION IS HEREBY GRANTED TO

Southern Wood Piedmont Company
Chatham County

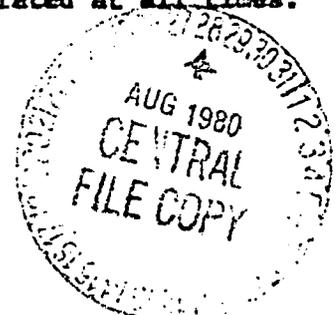
FOR THE

construction and operation of 8,000 GPD non-discharge type industrial wastewater treatment facilities consisting of a monitoring system, runoff collection systems for process areas and irrigation areas, gravity oil separator system, storage-settling ponds and appurtenances in series with two (2) aerated lagoons followed by a spray irrigation system with approximately 40 acres of properly terraced irrigation area, so that there shall not be any discharge of wastewater to the surface waters of the State,

pursuant to the application received August 8, 1980, and in conformity with the project plans, specifications, and other supporting data, subsequently filed and approved by the Department of Natural Resources and Community Development and considered a part of this Permit.

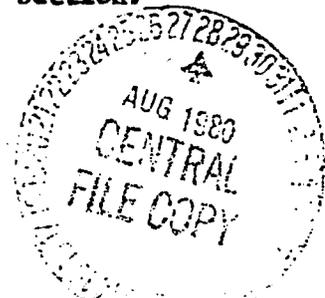
This Permit shall be effective from the date of issuance until rescinded, and shall be subject to the following specified conditions and limitations:

1. This permit shall become voidable unless the facilities are constructed in accordance with the approved plans, specifications and other supporting data.
2. This permit is effective only with respect to the nature and volume of wastes described in the application and other supporting data.
3. The facilities shall be properly maintained and operated at all times.
4. This permit is not transferable.



This permit shall become voidable in the event of failure of the soil to adequately absorb the wastes, and may be rescinded unless the facilities are installed, maintained and operated in a manner which will protect the assigned water quality standards of the surface waters, and prevent any contamination of the ground waters which will render them unsatisfactory for normal use.

6. In event the facilities fail to perform satisfactorily, the Permittee shall take such immediate corrective action as may be required by this Department.
7. Solids, sludges, or other pollutants removed or resulting from the wastewater treatment process shall be contained and disposed of in such a manner as to prevent any contamination of the surface or ground waters of the State.
8. This is a Class II Wastewater Treatment Plant and the person in responsible charge must hold a valid Grade II Certificate.
9. Diversion or bypassing of the untreated wastewater from the treatment facilities is prohibited.
10. Terracing shall be provided for all wastewater application areas so that all surface runoff will be returned to the treatment system.
11. Appropriate warning signs shall be posted around the wastewater treatment areas.
12. Reports on the operations of the spray irrigation facilities shall be submitted to the North Carolina Division of Environmental Management at regular intervals and in such form and detail as may be required by the Governing Board of the Division of Environmental Management.
13. The application rate shall not exceed one (1) inch/acre/week.
14. The Permittee, at least six (6) months prior to the expiration of this Permit, shall request its extension. Upon receipt of the request, the Commission will review the adequacy of the facilities described therein, and if indicated, will extend the Permit for such period of time and under such conditions and limitations as it may deem.
15. Freeboard in the wastewater treatment facility basins shall not be less than two (2) ^{feet} at any time.
16. Monitoring facilities including a groundwater monitoring well located approximately 50 feet north of pond No. 7 shall be constructed, and monitoring reports and data shall be submitted as required by the Division of Environmental Management, Water Quality Section.



Permit No. 3931-R

Page 3

Permit issued this the 20th day of August, 1980.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

Original Signed by

L. P. BENTON, JR.



Neil S. Grigg, Director
Division of Environmental Management
By Authority of the Secretary of the Department
of Natural Resources & Community Development

Permit No. 3931-R





Southern Wood Piedmont Company

11-M-1.4.8
August 6, 1980

Mr. Stan Taylor, Regional Engineer
Water Quality Section
N.C. DEPT. OF NATURAL RESOURCES
AND COMMUNITY DEVELOPMENT
P. O. Box 27687
Raleigh, North Carolina 27611

Dear Mr. Taylor:

Southern Wood Piedmont Company would like to thank you and Mr. Lars Godwin for the very cordial meeting on August 5, 1980. Confirming our conversation of that date, Southern Wood Piedmont Company will be closing our plant in Gulf, North Carolina, for economic reasons in 1980. This plant is located in Chatham County, and is west of Sanford, North Carolina, on Highway 421.

Pursuant to our conversation, we would like to completely dismantle the plant, evaporate all of the remaining water in the water pollution control project, level the plant site, and plant trees and grass on the area by the end of this year. In order to accomplish this, we must greatly increase the evaporation of the water currently held in the water pollution control project.

As we discussed, we are therefore asking your department to issue us an addendum to our Permit No. 3931, to allow us to evaporate this water by dispersing it over the approximately forty acres of land currently used as storage sites on the plant. The water in question is water that has been through our biological treatment system, consisting of two aerated lagoons, followed by a spray irrigation system on approximately six acres of grassed land. The runoff from this grassed field is then collected in No. 4 pond, where it is chemically flocculated to reduce the amount of suspended solids, etc. Compiled analytical results for the first seven months of this year for the No. 4 pond are enclosed.

We would harrow or scarify this acreage in question to prevent runoff from leaving the plant site. In addition, we would also put small berms around the area to be irrigated to also prevent any runoff from leaving the plant. We will make every effort to insure that there is no runoff from these irrigation efforts. We would propose to use a combination of irrigation-type equipment and tank trucks to put this water out.

MR. STAN TAYLOR
August 6, 1980
PAGE TWO.....

Also enclosed is the information you requested on the soil types in the Chatham County area where our plant is located. If we can provide any additional information on this subject, please let us know.

Due to the limited amount of hot, dry weather remaining in the year, we would appreciate your prompt action on this matter. Thank you for your cooperation.

Sincerely,

SOUTHERN WOOD PIEDMONT COMPANY



Joe Morgan III
Environmental Manager

JMIII:kwf

cc:


Mr. C. A. Burdell - Atlanta
Mr. M. T. Breen - Atlanta
Mr. C. E. Martin
Mr. M. E. Fix - Gulf
Mr. H. I. Warrington

Enclosures



↑ Southern Wood Piedmont Gulf Plant
 located under "u" of Gulf approximately.
 Soil type - W₃ - white stone, fine sandy
 loam, NC. Dept. of Agriculture.

SOUTHERN WOOD PIEDMONT COMPANY

WATER ANALYSIS REPORT

11-M-1.4-8

PLANT Gulf, N.C.

DATE SAMPLE TAKEN 1980

LOCATION # 4

DATE ANALYSIS RUN

	1/22	1/25	3/20	4/15	5/28	6/16	7/20						
pH	7.3	6.3	5.17	-	6.66	6.96	6.93						
C.O.D.	-*	547	487	685	835	637	495						
Phenols	-	.184	.32	.064	.075	.008	.04						
Oil and Grease	-	18	18.6	29.8	39.2	28.0	14						
Total Solids	960	1050	1179	-	1734	1699	1378						
Dissolved Solids	924	974	1071	-	1590	1587	1292						
Suspended Solids	36	76	108	-	144	112	96						
Volatile Solids	283	282	305	-	456	380	243						
Non-volatile Solids	677	768	874	-	1278	1319	1135						
Total Cr.													
As.													
Cu.													

Analyst Michael A. Pallen

Results in mg/l where applicable.

* Bottle Broken

UNITED STATES DEPARTMENT OF AGRICULTURE

Soil Survey
of
Chatham County, North Carolina

By

R. C. JURNEY, in Charge, J. T. MILLER, and
S. RANKIN BACON

*Gulf p. 23 Conger's Sand Loam
p. 30 Ws. White Sand Loam*



Bureau of Chemistry and Soils

In cooperation with the
North Carolina Department of Agriculture
and the
North Carolina Agricultural Experiment Station

8132

April 30, 1975

CERTIFIED MAIL
RETR.: FINCENLY REGISTERED

Mr. C. A. Burdall, Director
Research and Environmental
Southern Wood Piedmont Company
P. O. Box 5667
Spartanburg, South Carolina 29301

SUBJECT: Permit No. 8132
Southern Wood Piedmont Company
Gulf Plant
Cuthbert County, North Carolina

Dear Mr. Burdall:

In accordance with the application received April 5, 1974, we are forwarding herewith Permit no. 8132, issued April 30, 1975, to the Southern Wood Piedmont Company, Gulf Plant, Cuthbert County, North Carolina, for the continued operation of their wastewater treatment facility, consisting of gravity type oil separators, holding ponds, and the discharge of the effluent into a tributary of Deep River (Little Cedar Creek) in the Cape Fear River Basin, for an interim period of time necessary to provide a terminal land application system with no discharge to the surface waters of the state.

This Permit shall be effective from the date of issuance until June 30, 1976, and shall be subject to the terms and conditions specified therein.

Sincerely,
Original Signed by
LEWIS R. MARTIN
Lewis R. Martin

Enclosure

cc: Cuthbert County Health Department
Mr. L. F. Benton, Jr.
Mr. T. P. Armstrong
Mr. W. E. Long
Mr. R. Van Tilburg

What did they operate under from June 30, 1976 to August 20, 1980

ENVIRONMENTAL MANAGEMENT COMMISSION

DEPARTMENT OF NATURAL AND ECONOMIC RESOURCES

Raleigh

PERMIT

For the Discharge of Sewage, Industrial Wastes, or Other Wastes

In accordance with the provisions of Article 21 of Chapter 143, General Statutes of North Carolina as amended, and other applicable Laws, Rules and Regulations

PERMISSION IS HEREBY GRANTED TO

Southern Wood Piedmont Company
Gulf Plant
Chatham County

FOR THE

continued operation of their wastewater treatment facility, consisting of gravity type oil separators, holding ponds, and the discharge of the effluent into a tributary of Deep River (Little Cedar Creek) in the Cape Fear River Basin, for an interim period of time necessary to provide a terminal land application system with no discharge to the surface waters of the state,

pursuant to the application received April 5, 1974, and in conformity with the project plans, specifications, and other supporting data, subsequently filed and approved by the Department of Natural and Economic Resources and considered a part of this Permit.

This Permit shall be effective from the date of issuance until June 30, 1976, and shall be subject to the following specified conditions and limitations:

1. This Permit shall become void unless the facilities to provide terminal land application of the wastewater are constructed in accordance with the following time schedule:
 - a. Plans and specifications submitted on or before October 15, 1974.
 - b. Begin construction on or before May 15, 1975.
 - c. Complete construction on or before December 15, 1975.
 - d. Begin operation on or before January 15, 1976.
2. This Permit is effective with respect to the limitations pertaining to the nature and volume of effluent set forth as follows:

Interim Effluent Limitations
In mg/l (lbs/day)

During the period beginning with the effective date of this permit and lasting until Jan. 15, 1976, all charges from the Southern Wood Piedmont Company Wastewater Treatment Plant shall be limited as specified below:

<u>Effluent Characteristics</u>	<u>Daily Average</u>	<u>Daily Maximum</u>	<u>Other Units</u>	
			<u>Average</u>	<u>Maximum</u>
Flow			0.004 MGD	0.006 MGD
BOD, 5-Day, 20°C	1300 (39)	2000 (60)		
Total Suspended Solids	300 (9)	450 (14)		
Phenol	250 (8)	380 (12)		

Final Effluent Limitations

Beginning with Jan. 16, 1976, there shall be no discharge to the waters of the State.

The following definitions apply to this condition:

- a. The daily average flow is defined as the average of the daily effluent flows in million gallons per day (MGD) during the calendar month.
 - b. The daily average effluent by concentration is defined as the average of the daily effluent concentrations in milligrams per liter (mg/l) during the calendar month.
 - c. The daily average effluent by weight is defined as the daily average effluent by concentration multiplied by the daily average flow multiplied by 8.34.
 - d. The daily maximum flow is defined as the maximum flow for one day during the calendar month.
 - e. The daily effluent by weight is defined as the flow in MGD multiplied by the daily concentration for the same day multiplied by 8.34.
 - f. The daily maximum effluent by weight is defined as the maximum daily effluent by weight for one day during the calendar month.
3. This Permit shall become void unless the Permittee conducts monitoring and reporting in accordance with "Regulation Relating to Monitoring and Reporting Wastewater Discharges and Their Effect Upon Receiving Waters," adopted on May 17, 1973, by the North Carolina Board of Water and Air Resources.
 4. Pursuant to Chapter 90A of the General Statutes, this is a Class II wastewater treatment plant which requires that the operator in responsible charge hold a valid Grade II Certification.
 5. Construction of any facilities associated with this Permit shall not be initiated until plans and specifications have been submitted to the Permitting Authority and written approval of the Plan Documents has been issued.

Checked by ITD

Supervisor REK

ORGANIC ANALYSIS

Entered by _____

Checked by _____

Lab No. Water Analytical Results

1499 The following compounds were identified by matching to library mass spectra. They were not matched to standards:

Dihydroacemphthylene

Fluorene HW

Phenanthrene

Fluoranthene

Phenol

Methyl phenol

Dimethyl phenol

Ethyl, methyl phenol

Propyl phenol

Methyl Benzoquinone

Methyl Benzoic acid

Tetrachloro phenol

Pentachloro phenol

Naphthalene carboxylic acid

Quinolizole

Benzyne Carbazone HS HW PTP on stat.

Toluene HS HW PTP

3 unidentified peaks detected by GC/MS

COUNTY Wake

RIVER BASIN: Roanoke

REPORT TO: (Circle One)

ARO, WSRO, MRO, FRO, WRO, WIRO, BRO, TS, BM,

AM. OTHER:

COLLECTOR: L. J. ... + J.R. ...

N.C. DEPT. OF NATURAL RESOURCES AND COMMUNITY DEVELOPMENT

DIVISION OF ENVIRONMENTAL MANAGEMENT

FIELD/LAB FORM
SEDIMENT/TISSUE

<input checked="" type="checkbox"/> SEDIMENT	<input type="checkbox"/> AMBIENT	<input type="checkbox"/> CORE
<input type="checkbox"/> TISSUE	<input type="checkbox"/> COMPLIANCE	<input type="checkbox"/> SPLIT
	<input checked="" type="checkbox"/> INTENSIVE S.	<input type="checkbox"/> EMERGENCY

LAB NUMBER: 150

DATE RECEIVED: 4-22-03

RECEIVED BY: [Signature]

DATA ENTRY BY: [Signature] CK: [Signature]

DATE REPORTED: 4-29-03

STATION LOCATION: Old Mill Pond Property, ...

REMARKS: Gravels, ...

Station Number	Date Begin	Time Begin	Date End	Time End	Depth DM DB DMB	Value Type	T, S, or B	Sample Type
<u>2</u>	<u>82-03-20</u>	<u>1100</u>				<u>A H L</u>		<u>C G GNXX</u>

Tissue	Units	Sediment	Units	Tissue	Units	Sediment	Units	Tissue	Units	Sediment	Units
704	mg/Kg	01003 Al	5.6 mg/Kg	00611 NH3	mg/Kg	39482 Methoxychl	ug/Kg	39481 Methoxychl	ug/Kg	39481 Methoxychl	ug/Kg
81666 Al	mg/Kg	01108 Al	68 mg/Kg	00627 TKN as N	mg/Kg	34888	mg/Kg	39701	mg/Kg	39701	ug/Kg
71940 Cd	mg/Kg	01028 Cd	5.50 mg/Kg	00633 NO2 & NO3	mg/Kg	39080	ug/g	39061	ug/Kg	39061	ug/Kg
71939 Cr, tot	mg/Kg	01029 Cr, tot	18 mg/Kg	00648 P, tot as P	mg/Kg	39074	ug/g	39078	ug/Kg	39078	ug/Kg
71937 Cu	mg/Kg	01043 Cu	25 mg/Kg	70511 PO4 as P	mg/Kg	39075	ug/g	3981	ug/Kg	3981	ug/Kg
81660 Fe	mg/Kg	01170 Fe	1x000 mg/Kg	34880 Aldrin	mg/Kg	39333	mg/Kg	34883	mg/Kg	39383	ug/Kg
71930 Hg	mg/Kg	71921 Hg	1.19 mg/Kg	34884 Dieldrin	mg/Kg	39383	mg/Kg	39515	mg/Kg	39518	ug/Kg
81656 Mg	mg/Kg	00924 Mg	1.4 mg/Kg	39325 o.p DDD	ug/g	39316	ug/Kg	PCB		PCB	ug/Kg
01069 Ni	mg/Kg	01068 Ni	15 mg/Kg	39312 p.p DDD	ug/g	39311	ug/Kg	Others:		Others:	
71936 Pb	mg/Kg	01052 Pb	2.2 mg/Kg	39328 o.p DDE	ug/g	39328	ug/Kg	<u>ORGANIC</u>		<u>SCAN</u>	
71938 Zn	mg/Kg	01093 Zn	4.3 mg/Kg	39322 p.p DDE	ug/g	39321	ug/Kg	<u>Cruciate</u>			
Other Metals:	mg/Kg	Other Metals:	mg/Kg	39299 Total DDT	ug/g	39373	ug/Kg				
	mg/Kg		mg/Kg	39318 o.p DDT	ug/g	39306	ug/Kg				
	mg/Kg		mg/Kg	39302 p.p DDT	ug/g	39301	ug/Kg				
	mg/Kg		mg/Kg	39063 cis-Chlordane	ug/g	39064	ug/Kg				
	mg/Kg		mg/Kg	39066 trans-Chlordane	ug/g	39067	ug/Kg				
	mg/Kg		mg/Kg	39069 cis-N-chlor	ug/g	39070	ug/Kg				
	mg/Kg		mg/Kg	39072 trans-N-chlor	ug/g	39073	ug/Kg				
	mg/Kg		mg/Kg								

Sampling Point	Temperature °C	Dissolved Oxygen	pH Units	Conductivity	Salinity ‰	Turbidity FTU	Stream Color	Secchi (M)
<u>PI</u>	<u>10</u>	<u>300</u>	<u>400</u>	<u>85</u>	<u>70305</u>	<u>76</u>		<u>78</u>
<u>R P</u>	<u>Stream Stage II.</u>	<u>Flow - MGD</u>	<u>Floating Debris Sever.</u>	<u>Sludge Severity</u>	<u>Detergent Suds Sever.</u>	<u>Atmos. Odor Severity</u>	<u>Cloud Cover ‰</u>	<u>Wind Dir. from North</u>

Lab No.

Sediment Analytical Results

1500

The following compounds were identified by matching to library mass spectra. They were not matched to standards:

Chlorophenol

Tetrachlorophenol

Dichlorophenol

P-methylchlorophenol

1-naphthalene HS HW PTP

Methyl naphthalene

Nitrobenzene

Fluorene

Fluoranthene

Fluoranthene

Pyrene

✓ GC/MS/DS used

DEVELOPMENT

LAB NUMBER 00008: 1201
 DATE RECEIVED: 3-20-86
 RECEIVED BY: [Signature]
 DATA ENTRY BY: [Signature] CR: [Signature]
 DATE REPORTED: 4-18-86

RIVER BASIN: FOOT
 REPORT TO: (Circle One)
 ARO, PRO, MRO, RRO, WARD WIRO, WSRO, BM, TS,
 OTHER:
 COLLECTOR(S): Lars Erickson & TR P...
 BOD RANGE: SEED:
 CHLORINATED

DIVISION OF ENVIRONMENTAL MANAGEMENT
 WATER QUALITY FIELD-LAB FORM (DM1)

3

SAMPLE TYPE
 AMBIENT CORE COMPLIANCE
 INTENSIVE S. SPLIT EMERGENCY

STATION LOCATION: Southern Tributary
 REMARKS: in the field site

Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type	Sample Type	Composite
<u>SAMPLE 3</u>		<u>1010</u>				A H L	C G GNXX	T S B
MODS 310	mg/l	Chloride 940	mg/l	NH ₃ as N 610	mg/l	Mo - Molybdenum 1062	ug/l	
COD-High 340	mg/l	Arsenic(Inorganic) 997	ug/l	TKN as N 625	mg/l	Na - Sodium 929	mg/l	
COD-Low 335	mg/l	Chl a: Trl 32210	ug/l	NO ₂ +NO ₃ as N 630	mg/l	Ni - Nickel 1067	ug/l	
Coliform:MF Fecal 31616	/100ml	Chl a: Corr 32211	ug/l	PO ₄ as P 70507	mg/l	Pb - Lead 1051	ug/l	
Coliform:MF Total 31504	/100ml	Phaeophytin a 32218	ug/l	P: Total as P 665	mg/l	Sb - Antimony 1097	ug/l	
Coliform:Tube Fecal 31615	/100ml	Color: True 80	PI-Co	P: Dissolved as P 666	mg/l	Sn - Tin 1102	ug/l	
Coliform:Tube Total 31505	/100ml	Chromium:Hex. 1032	ug/l	Ag - Silver 1077	ug/l	V - Vanadium 1087	ug/l	
Residue: Total 500	mg/l	Cyanide 720	mg/l	Al - Aluminum 1105	ug/l	Zn - Zinc 1092	ug/l	
Volatile 505	mg/l	Fluoride 951	mg/l	Ba - Barium 1007	ug/l	Pesticides (Specify)		
Fixed 510	mg/l	Formaldehyde 71880	mg/l	Be - Beryllium 1012	ug/l			
Residue: Suspended 530	mg/l	Grease and Oils 556	mg/l	Ca - Calcium 916	mg/l			
Volatile 535	mg/l	Hardness: Total 900	mg/l	Cd - Cadmium 1027	ug/l			
Fixed 540	mg/l	MBA5 38260	mg/l	Co - Cobalt 1037	ug/l	Organics (Specify)		
pH 403	units	Phenols 32230	ug/l	Chromium: Total 1034	ug/l			
Acidity to pH 4.5 436	mg/l	Sulfate 945	mg/l	Cu - Copper 1042	ug/l			
Acidity to pH 8.3 435	mg/l	Sulfide 745	mg/l	Fe - Iron 1045	ug/l			
Alkalinity to pH 8.3 415	mg/l	Specific Cond. 95	uMhos/cm	Hg - Mercury 71900	ug/l			
Alkalinity to pH 4.5 410	mg/l	Biomass: Dry Wt. 573	g/M	Li - Lithium 1132	ug/l			
IOC 680	mg/l	Biomass: Perl Ash Free 572	g/M	Mg - Magnesium 927	mg/l			
Turbidity 76	NTU	Chl a: Peri Spectro 32228	mg/M	Mn - Manganese 1055	ug/l			

Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	pH 8.3	Alkalinity pH 4.5	pH 4.5	Acidity pH 8.3
PT 1	10	300	400	74	82244	431	82243	82242
Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity ‰	Algae: Floating Mats Severity	Precipitation (In/Day)	Cloud Cover: %	Wind Direction (Deg.)	Wind Force Beaufort
78	20	301	480	1325	45	32	36	37
11th Settling Matter (ml/11hr.)	Dead Fish Severity	Turbidity Severity	Odor: Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
50086	1340	1350	1330	1351	1305	1300	1345	1315

by PTD

revisor REK

ORGANIC ANALYSIS

Entered by PTD

Checked by _____

Lab No. | WATER Analytical Results

501 | The following cpds were identified by matching to library mass spectra. They were not matched to standards:

~~Phenol~~

Phenol

methyl phenol

Benzoic acid

Hydroxy-methoxy-Benzaldehyde

Benzoic propionic acid

Dichlorophenol

Penta-chlorophenol

Fluoranthrene

Pyrene

2 unidentified peaks detected by GC/MS

No volatiles detected by GC/MS

N.C. DEPT. OF NATURAL RESOURCES & COMMUNITY DEVELOPMENT

COUNTY: Chatham

RIVER BASIN: Cape Fear

REPORT 10: (Circle One)

ARO, FRO, MRO (RRO) WoRO WiRO, WSRO, BM, TS.

OTHER: _____

COLLECTOR(S): Paul G. Gindus

BOD RANGE _____ SEED _____

CHLORINATED _____

DIVISION OF ENVIRONMENTAL MANAGEMENT
WATER QUALITY FIELD-LAB FORM (DM1)

SAMPLE TYPE

- AMBIENT CORE COMPLIANCE
 INTENSIVE S. SPLIT EMERGENCY

STATION LOCATION: Drainage ditch

REMARKS: Southern wood lotland well #11

LAB NUMBER 00008: 1502
DATE RECEIVED: 8.2.03/26
RECEIVED BY: H. J. Lee
DATA ENTRY BY: SK
DATE REPORTED: 1-25-02

4

Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value type A H L	Sample type C G GNXX	Composite I S B
Sample 4	02/03/26	11:30						
1	BOD5 310	mg/l	Chloride 940	mg/l	NH3 as N 610	mg/l	Mo - Molybdenum 1062	ug/l
2	COD: High 340	mg/l	✓ Arsenic: Inorganic 1002	ug/l	TKN as N 625	mg/l	Na - Sodium 929	mg/l
3	COD: Low 335	mg/l	Chl a: Tri 32217	ug/l	NO2 + NO3 as N 630	mg/l	✓ Ni - Nickel 1067	400 ug/l
4	Coliform: MF Fecal 31616	/100ml	Chl a: Corr 32209	ug/l	PO4 as P 70507	mg/l	✓ Pb - Lead 1051	100 ug/l
5	Coliform: MF Total 31504	/100ml	Phosphytin a 32213	ug/l	P: Total as P 665	mg/l	Sb - Antimony 1097	ug/l
6	Coliform Tube Fecal 31615	/100ml	Color: True 80	PI-Co	P: Dissolved as P 666	mg/l	Sn - Tin 1102	ug/l
7	Coliform Tube Total 31505	/100ml	Chromium: Hex. 1032	ug/l	Ag - Silver 1077	ug/l	V - Vanadium 1087	ug/l
8	Residue Total 500	mg/l	Cyanide 720	mg/l	Al - Aluminum 1105	ug/l	✓ Zn - Zinc 1092	50 ug/l
9	Volatile 505	mg/l	Fluoride 951	mg/l	Ba - Barium 1007	ug/l	Pesticides (Specify)	
10	Fixed 510	mg/l	Formaldehyde 71880	mg/l	Be - Beryllium 1012	ug/l		
11	Residue Suspended 530	mg/l	Grease and Oils 556	mg/l	Ca - Calcium 916	mg/l		
12	Volatile 535	mg/l	Hardness: Total 900	mg/l	✓ Cd - Cadmium 1027	550 ug/l		
13	Fixed 540	mg/l	MBAS 38260	mg/l	✓ Co - Cobalt 1037	< 100 ug/l	✓ Organics (Specify)	Scan
14	pH 403	units	Phenols 32730	ug/l	✓ Chromium: Total 1034	< 50 ug/l		Phenol
15	Acidity to pH 4.5 436	mg/l	Sulfate 945	mg/l	✓ Cu - Copper 1042	40 ug/l		
16	Acidity to pH 8.3 435	mg/l	Sulfide 745	mg/l	✓ Fe - Iron 1045	14000 ug/l		Volatiles
17	Alkalinity to pH 8.3 415	mg/l	Specific Cond. 95	uMhos/cm	✓ Hg - Mercury 1090	Omit ug/l		Grease etc
18	Alkalinity to pH 4.5 410	mg/l	Biomass: Dry Wt. 573	g/M	Li - Lithium 1132	ug/l		
19	TOC 689	mg/l	Biomass: Peri. Ash Free 572	g/M	✓ Mg - Magnesium 927	21 mg/l		
20	Turbidity 76	NTU	Chl a: Peri Fluoro 82547	mg/M	✓ Mn - Manganese 1055	1600 ug/l		

Sampling Point	Water temperature (°C)	D.O.	pH	Conductance at 25°C	pH 8.3	Alkalinity pH 4.5	pH 4.5	Acidity pH 8.3
A PT 1	10	300	400	94	82244	431	82243	82242
B Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity ‰	Algae: Floating Mats Severity	Precipitation (In/Day)	Cloud Cover. %	Wind Direction (Deg 1)	Wind Force Beaufort
C 1 Hr Settleable Matter (ml/1Ltr)	20	301	480	1325	45	32	36	37
50086	1340	1350	1330	1351	1305	1300	1345	1315

12
PTD

revisor REK

ORGANIC ANALYSIS

Entered by pm

Checked by _____

b No. Water Analytical Results

502 The following compounds were identified by matching to library mass spectra - They were not matched to standards

- Naphthalene
- Methyl naphthalene
- dimethyl naphthalene + undecane
- dihydroacemphthylene
- dibenzofuran
- trimethyl naphthalene
- octadecane
- fluorene
- phenanthrene
- methyl phenanthrene
- fluoranthene
- pyrene
- benzofluorene
- chrysene
- benz[a]anthracene
- tetrachlorophenol
- pentachlorophenol
- 4H-cyclopenta[DEF]phenanthrene
- Naphthalene carboxylic acid
- Acetic acid ethyl ester
- methyl pentane
- Dimethyl Butane
- Methyl Benzene (Toluene)
- Trimethyl Bicyclo Heptane
- Dihydro Indene

RIVER BASIN: Fr...

REPORT TO: (Circle One)

ARO, FRO, MRO, RRO, WARO WIRO, WSRO, BM, TS.

OTHER:

COLLECTOR(S): T. P. ...

BOD RANGE: _____ SEED: _____

CHLOROPHATED

DIVISION OF ENVIRONMENTAL MANAGEMENT
WATER QUALITY FIELD-LAB FORM (DM1)

SAMPLE TYPE

- AMBIENT CORE COMPLIANCE
 INTENSIVE S. SPLIT EMERGENCY

STATION LOCATION: La Jolla ...

REMARKS: ...

LAB NUMBER 00000: 15000

DATE RECEIVED: 8-2-76

RECEIVED BY: _____

DATA ENTRY BY: _____ CK

DATE REPORTED: _____

Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type			Sample Type			Composite							
						A	H	L	C	G	GNXX	T	S	B					
1	8-1-76	1145																	
BODs 310		mg/l	Chloride 940		mg/l	NH ₃ as N 610					Mo - Molybdenum 1062								
COD High 340		mg/l	Arsenic Inorganic 997		ug/l	TKN as N 625					Na - Sodium 929								
COD Low 335		mg/l	Chl a + Trl 32210		ug/l	NO ₂ + NO ₃ as N 630					Ni - Nickel 1067								<100
Coliform: MF Fecal 31616		/100ml	Chl a: Corr 32211		ug/l	PO ₄ as P 70507					Pb - Lead 1051								100
Coliform: MF Total 31504		/100ml	Phaeophytin a 32218		ug/l	P Total as P 665					Sb - Antimony 1097								
Coliform: Tube Fecal 31615		/100ml	Color: True 80		Pl-Co	P Dissolved as P 666					Sn - Tin 1102								
Coliform: Tube Total 31505		/100ml	Chromium: Hex. 1032		ug/l	Ag - Silver 1077					V - Vanadium 1087								
Residue: Total 500		mg/l	Cyanide 720		mg/l	Al - Aluminum 1105					Zn - Zinc 1092								50
Volatile 505		mg/l	Fluoride 951		mg/l	Ba - Barium 1007					Pesticides (Specify)								
Fixed 510		mg/l	Formaldehyde 71880		mg/l	Bz - Beryllium 1012													
Residue: Suspended 520		mg/l	Grease and Oils 556		mg/l	Ca - Calcium 916													
Volatile 535		mg/l	Hardness: Total 900		mg/l	Cd - Cadmium 1027													<50
Fixed 540		mg/l	MBA5 38260		mg/l	Co - Cobalt 1037													<100
pH 403		unit	Phenols 32730		ug/l	Chromium: Total 1034													<50
Acidity to pH 4.5 436		mg/l	Sulfate 945		mg/l	Cu - Copper 1042													<40
Acidity to pH 8.3 425		mg/l	Sulfide 745		mg/l	Fe - Iron 1045													18000
Alkalinity to pH 8.3 415		mg/l	Specific Cond. 95		uMhos/cm	Hg - Mercury 71900													
Alkalinity to pH 4.5 410		mg/l	Biomass: Dry Wt. 573		g/M	Li - Lithium 1132													
TOC 680		mg/l	Biomass: Peri Ash Free 572		g/M	Mg - Magnesium 927													18
Turbidity 76		NTU	Chl a: Peri Spectra 32228		mg/M	Mn - Manganese 1055													7400

Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	Alkalinity		Acidity	
					pH 8.3	pH 4.5	pH 4.5	pH 8.3
21	10	300	400	94	82244	431	82243	82242
Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity ‰	Algae: Floating Mats Severity	Precipitation (In/Day)	Cloud Cover: %	Wind Direction (Deg.)	Wind Force Beaufort
28	20	301	480	1325	45	37	36	37
1 Hr Settling Matter (ml/100ml)	Dead Fish Severity	Turbidity Severity	Odor: Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
50086	1340	1350	1330	1351	1305	1300	1345	1315

Lab No. Water

Analytical Results

1503 The following compounds were identified by matching to library mass spectra. They were not matched to standards

tetrachlorophenol
pentachlorophenol
anthracene

3 unidentified peaks detected by GC/MS

1504 The following compound was identified by matching to library mass spectra. It was not matched to standards

Trichloro, Trifluoro, ethane

one unidentified peak detected by GC/MS.

Sediment

1505 The following compounds were identified by matching to library mass spectra. They were not matched to standards

Phenanthrene
Fluoranthene
Pyrene
Benz [A] anthracene
Chrysene
Benz [K] Fluoranthene
Pentachlorophenol

✓ GC/MS/DS used

N.C. DEPT. OF NATURAL RESOURCES & COMMUNITY DEVELOPMENT

COUNTY: Chatham

RIVER BASIN: Cape Fear

REPORT TO: (Circle One)

ARO, FRO MRO WORO WIRD, WSRD, BM, TS,

OTHER:

COLLECTOR(S): Frank & Gordon

BOD RANGE: SEED:

DIVISION OF ENVIRONMENTAL MANAGEMENT
WATER QUALITY FIELD-LAB FORM (DM1)

SAMPLE TYPE

- AMBIENT CORE COMPLIANCE
 INTENSIVE S SPLIT EMERGENCY

STATION LOCATION: L.H. Cedar Creek

LAB NUMBER 0008: 1504
DATE RECEIVED: 3.20.26
RECEIVED BY: [Signature]
DATE ENTRY BY: [Signature]
DATE REPORTED:

CHLORINATED: REMARKS: 100 yds up stream of confluence with Little

Station Number	Date Begin/yy/mm/dd	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type			Sample Type			Composite	
						A	H	L	C	G	GNXX		T
1	3/20/26	12:45											
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													
16													
17													
18													
19													
20													

Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	Alkalinity		Acidity	
					pH 8.3	pH 4.5	pH 4.5	pH 8.3
A PT 1	10	300	400	94	82244	431	82243	82242
B Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity ‰	Algae, Floating Mats Severity	Precipitation (In/Day)	Cloud Cover %	Wind Direction (Deg)	Wind Force Beaufort
8	20	301	480	1325	45	32	36	37
C 1 Hr Setttable Matter (ml/100ml)	Dead Fish Severity	Turbidity Severity	Odor Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
50086	1340	1350	1330	1351	1305	1300	1345	1315

Lab No. Water

Analytical Results

1503

The following compounds were identified by matching to library mass spectra. They were not matched to stds

tetrachlorophenol
pentachlorophenol
anthracene

3 unidentified peaks detected by GC/MS

1504

The following compound was identified by matching to library mass spectra. It was not matched to stds

Trichloro, Trifluoro, ethane

one unidentified peak detected by GC/MS.

Sediment

1505

The following compounds were identified by matching to library mass spectra. They were not matched to standards

Phenanthrene
Fluoranthene
Pyrene
Benz [A] anthracene
Chrysene
Benz [K] Fluoranthene
Pentachlorophenol

✓ GC/MS/DS used

Lab No. Water

Analytical Results

1503 The following compounds were identified by matching to library mass spectra. They were not matched to stds

tetrachlorophenol
pentachlorophenol
anthracene

3 unidentified peaks detected by GC/MS

1504 The following compound was identified by matching to library mass spectra. It was not matched to stds

Trichloro, Trifluoro, ethane

one unidentified peak detected by GC/MS

Sediment

1505 The following compounds were identified by matching to library mass spectra. They were not matched to standards

Phenanthrene
Fluoranthene
Pyrene
Benz [A] anthracene
Chrysene
Benz [K] Fluoranthene
Pentachlorophenol

✓ GC/MS/DS used

N.C. DEPT. OF NATURAL RESOURCES & COMMUNITY DEVELOPMENT

LAB NUMBER 00008: 1506
 DATE RECEIVED: 2/13/11
 RECEIVED BY: [Signature]
 DATA ENTRY BY: CK
 DATE REPORTED: _____

COUNTY: _____
 RIVER BASIN: _____
 REPORT TO: (Circle One) _____
 ARO, FRO, MRO, RRO, WORO WIRO, WSRO, BM, TS,
 OTHER: _____
 COLLECTOR(S): [Signature]
 BOD RANGE: _____ SEED: _____

DIVISION OF ENVIRONMENTAL MANAGEMENT
 WATER QUALITY FIELD-LAB FORM (DM1)

7

SAMPLE TYPE

AMBIENT CORE COMPLIANCE
 INTENSIVE S. SPLIT EMERGENCY

STATION LOCATION: _____

CHLORINATED: _____ REMARKS: _____

Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type A H L	Sample Type C G GNXX	Composit T
1		1015						
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								

Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	pH 8.3	Alkalinity pH 4.5	pH 4.5	Acidity pH 8.3
A PT 1	19	300	400	94	82244	431	82243	82242
B Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity ‰	Algae; Floating Mats Severity	Precipitation (In/Day)	Cloud Cover: %	Wind Direction (Deg.)	Wind Force Beaufort
78	20	301	480	1325	45	32	36	37
C 1 Hr. Settleable Matter (ml/1Hr)	Dead Fish Severity	Turbidity Severity	Odor; Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
50086	1340	1350	1330	1351	1305	1300	1345	1315

ed by PTD

ORGANIC ANALYSIS

Supervisor REK

Entered by fm

Checked by _____

Lab No. Water Analytical Results

1506 / The following compounds were identified by matching to library mass spectra. They were not matched to standards.

- Fluoranthene Hw+ PTP PAHs not exceeding 2 ug/l
- Pyrene
- Chrysene
- Hydroxy methyl Pentamere
- Tetra Chlorophenol
- Penta Chloro phenol

three unidentified peaks detected by GC/MS

~~Acidic or Basic Compounds~~

1507

~~Acidic or Basic Compounds~~
No Acid or Base Neutral Compounds detected by GC/FTD

N.C. DEPT. OF NATURAL RESOURCES & COMMUNITY DEVELOPMENT

COUNTY: C. H. W.

RIVER BASIN: Camp Run

REPORT TO: (Circle One)

ARO, FRO MRO (RRO) WORO WIRO, WSRO BM, TS

OTHER:

COLLECTOR(S): P. J. ...

BOD RANGE: _____ SEED: _____

CHLORINATED: _____

DIVISION OF ENVIRONMENTAL MANAGEMENT
WATER QUALITY FIELD-LAB FORM (DM1)

SAMPLE TYPE

- AMBIENT CORE COMPLIANCE
 INTENSIVE S. SPLIT EMERGENCY

8

STATION LOCATION: L. 141. Cedar Creek 100 yd. N. of ...

REMARKS: compliance with ...

LAB NUMBER 00008: 00008
DATE RECEIVED: 8.2.03
RECEIVED BY: Horvath
DATA ENTRY BY: CK
DATE REPORTED: 1

Station Number	Date Begin (yy/mm/dd)	Time Begin	Date End	Time End	Depth DM DB DBM	Value Type			Sample Type			Composite							
						A	H	L	C	G	GNXX		I						
1	82	10	26	12.30															
2	BOD ₅ 310	mg/l	Chloride 940	mg/l	NH ₃ as N 610	mg/l	Mo - Molybdenum 1067	ug/l											
3	COD High 340	mg/l	Arsenic: Inorganic 1002	<10 ug/l	TKN as N 625	mg/l	Na - Sodium 929	mg/l											
4	COD Low 335	mg/l	Chl a: Tri 32217	ug/l	NO ₂ +NO ₃ as N 630	mg/l	Ni - Nickel 1067	<100 ug/l											
5	Coliform: MF Fecal 31616	/100ml	Chl a: Corr 32209	ug/l	PO ₄ as P 70507	mg/l	Pb - Lead 1051	<100 ug/l											
6	Coliform: MF Total 31504	/100ml	Phaeophytin a 32213	ug/l	P: Total as P 665	mg/l	Sb - Antimony 1097	ug/l											
7	Coliform: Tube Fecal 31615	/100ml	Color: True 80	Pt-Co	P: Dissolved as P 666	mg/l	Sn - Tin 1102	ug/l											
8	Coliform: Tube Total 31505	/100ml	Chromium: Hex. 1032	ug/l	Ag - Silver 1077	ug/l	V - Vanadium 1087	ug/l											
9	Residue: Total 500	mg/l	Cyanide 770	mg/l	Al - Aluminum 1105	ug/l	Zn - Zinc 1092	<50 ug/l											
10	Residue: Volatile 505	mg/l	Fluoride 951	mg/l	Ba - Barium 1007	ug/l	Pesticides (Specify)												
11	Residue: Fixed 510	mg/l	Formaldehyde 71880	<.1 mg/l	Be - Beryllium 1012	ug/l													
12	Residue: Suspended 530	mg/l	Grease and Oils 556	mg/l	Cg - Calcium 916	mg/l													
13	Volatile 535	mg/l	Hardness: Total 900	mg/l	Cd - Cadmium 1027	<50 ug/l													
14	Fixed 540	mg/l	MBAS 38260	mg/l	Co - Cobalt 1037	<100 ug/l													
15	pH 403	units	Phenols 32730	ug/l	Cr - Chromium 1034	<50 ug/l													
16	Acidity to pH 4.5 436	mg/l	Sulfate 945	mg/l	Cu - Copper 1042	<40 ug/l													
17	Acidity to pH 8.3 435	mg/l	Sulfide 745	mg/l	Fe - Iron 1045	80.0 ug/l													
18	Alkalinity to pH 8.3 415	mg/l	Specific Cond. 95	uMhos/cm	Hg - Mercury 71900	<0.2 ug/l													
19	Alkalinity to pH 4.5 410	mg/l	Biomass: Dry Wt. 573	g/M	Li - Lithium 1132	ug/l													
20	IOC 680	mg/l	Biomass: Peri Ash Free 572	g/M	Mg - Magnesium 927	4.9 mg/l													
	Turbidity 76	NTU	Chl a: Peri Fluoro 82547	mg/M	Mn - Manganese 1055	90 ug/l													

A	Sampling Point	Water Temperature (°C)	D.O.	pH	Conductance at 25°C	Alkalinity		Acidity	
						pH 8.3	pH 4.5	pH 4.5	pH 8.3
	PT 1	10	300	400	74	82244	431	82243	82242
B	Secchi (Meters)	Air Temperature (°C)	D.O. % Saturation	Salinity ‰	Algae: Floating Mats Severity	Precipitation (In/Day)	Cloud Cover: %	Wind Direction (Deg.)	Wind Force Beaufort
	78	20	301	480	1325	45	32	36	37
C	1 Hr Settling Matter (ml/100ml)	Dead Fish Severity	Turbidity Severity	Odor: Atmosphere Severity	Stream Flow Severity	Detergent Suds Severity	Oil-Grease Severity	Floating Debris Severity	Sludge Severity
	50086	1340	1350	1330	1351	1305	1300	1345	1315

ed by PTD

ORGANIC ANALYSIS

Supervisor REK

Entered by pm

Checked by _____

Lab No. Water Analytical Results

1506 The following compounds were identified by matching to library mass spectra. They were not matched to standards:

- Fluoranthene Hw+ PTP PAHs not exceeding 2ug/l
- Pyrene
- Chrysene
- Hydroxy methyl Pentanone
- Tetra Chlorophenol
- Penta Chloro phenol

three unidentified peaks detected by GC/MS

1507

~~Fluoranthene Hw+ PTP PAHs not exceeding 2ug/l~~
~~Pyrene~~
~~Chrysene~~
~~Hydroxy methyl Pentanone~~
~~Tetra Chlorophenol~~
~~Penta Chloro phenol~~
 No Acid or Base Neutral groups detected by GC/FTD

**Southern Wood Piedmont Company**

11-M-1.4.8
August 6, 1980

Mr. Stan Taylor, Regional Engineer
Water Quality Section
N.C. DEPT. OF NATURAL RESOURCES
AND COMMUNITY DEVELOPMENT
P. O. Box 27687
Raleigh, North Carolina 27611

Dear Mr. Taylor:

Southern Wood Piedmont Company would like to thank you and Mr. Lars Godwin for the very cordial meeting on August 5, 1980. Confirming our conversation of that date, Southern Wood Piedmont Company will be closing our plant in Gulf, North Carolina, for economic reasons in 1980. This plant is located in Chatham County, and is west of Sanford, North Carolina, on Highway 421.

Pursuant to our conversation, we would like to completely dismantle the plant, evaporate all of the remaining water in the water pollution control project, level the plant site, and plant trees and grass on the area by the end of this year. In order to accomplish this, we must greatly increase the evaporation of the water currently held in the water pollution control project.

As we discussed, we are therefore asking your department to issue us an addendum to our Permit No. 3931, to allow us to evaporate this water by dispersing it over the approximately forty acres of land currently used as storage sites on the plant. The water in question is water that has been through our biological treatment system, consisting of two aerated lagoons, followed by a spray irrigation system on approximately six acres of grassed land. The runoff from this grassed field is then collected in No. 4 pond, where it is chemically flocculated to reduce the amount of suspended solids, etc. Compiled analytical results for the first seven months of this year for the No. 4 pond are enclosed.

We would harrow or scarify this acreage in question to prevent runoff from leaving the plant site. In addition, we would also put small berms around the area to be irrigated to also prevent any runoff from leaving the plant. We will make every effort to insure that there is no runoff from these irrigation efforts. We would propose to use a combination of irrigation-type equipment and tank trucks to put this water out.

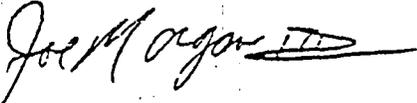
MR. STAN TAYLOR
August 6, 1980
PAGE TWO.....

Also enclosed is the information you requested on the soil types in the Chatham County area where our plant is located. If we can provide any additional information on this subject, please let us know.

Due to the limited amount of hot, dry weather remaining in the year, we would appreciate your prompt action on this matter. Thank you for your cooperation.

Sincerely,

SOUTHERN WOOD PIEDMONT COMPANY



Joe Morgan III
Environmental Manager

JMIII:kwf

cc:


Mr. C. A. Burdell - Atlanta
Mr. M. T. Breen - Atlanta
Mr. C. E. Martin
Mr. M. E. Fix - Gulf
Mr. H. I. Warrington

Enclosures



Southern Wood Piedmont Gulf Plant
 Located under "u" of Gulf. Approximately.
 Soil type - W₃ - White Stone, fine sandy
 loam, N.C. Dept. of Agriculture.

WATER ANALYSIS REPORT

11-M-1.4.8

PLANT

Gulf, N.C.

DATE SAMPLE TAKEN

1980

LOCATION

4

DATE ANALYSIS RUN

	$\frac{1}{22}$	$\frac{2}{25}$	$\frac{3}{26}$	$\frac{4}{15}$	$\frac{5}{28}$	$\frac{6}{16}$	$\frac{7}{20}$						
pH	7.3	6.3	5.17	-	6.66	6.96	6.93						
C.O.D.	-*	547	487	685	855	637	495						
Phenols	-	.184	.32	.064	.075	.008	.04						
Oil and Grease	-	18	14.6	29.8	39.2	23.0	14						
Total Solids	960	1050	1179	-	1734	1699	1378						
Dissolved Solids	924	974	1071	-	1590	1587	1292						
Suspended Solids	36	76	108	-	144	112	96						
Volatile Solids	283	282	305	-	456	380	243						
Non-volatile Solids.	677	768	874	-	1278	1319	1135						
Total Cr.													
As.													
Cu.													

Analyst

Michael A. Rollin

Results in mg/l where applicable.

* Bottle Broken

UNITED STATES DEPARTMENT OF AGRICULTURE

Soil Survey
of
Chatham County, North Carolina

By

R. C. JURNEY, in Charge, J. T. MILLER, and
S. RANKIN BACON

*Gulf p. 23 Conger's Sand Loam
p. 30 Ws. White Sand Loam*



Bureau of Chemistry and Soils

In cooperation with the
North Carolina Department of Agriculture
and the
North Carolina Agricultural Experiment Station