



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

June 30, 2010

Mr. William H. Tomlinson, President
APAC-Atlantic, Inc.
900 Ashwood Parkway, Suite 700
Atlanta, GA 30338

Re: **Phase II Remedial Investigation Work Plan**
APAC-Carolina, Inc., Castle Hayne Asphalt Plant
4901 and 4909 N. College Road
Castle Hayne, New Hanover County, NC
NONCD0002779

Dear Mr. Tomlinson:

I have completed my review of the Phase II Remedial Investigation Work Plan (RIP2) prepared for the subject site by Environmental Services, Inc. (ESI) and received on June 21, 2010. The RIP2 is approved with the following comments and recommendations:

1. In item 2.1.1 of the Table of Contents, rinsate is spelled wrong.
2. As a reminder, please refer to the Soil Remediation Goals Table on the Branch's website (<http://portal.ncdenr.org/web/wm/sf/ihs/ihsguide>) prior to the submittal of each report as the soil remedial goals are updated periodically.
3. As outlined in item 7 of my April 27, 2010 correspondence, the TCLP concentrations for arsenic in DP-7 and DP-9A were below the method detection limits (MDL), but the MDLs were above the arsenic standard for groundwater. The documentation provided by ENCO indicates that the reported MDLs were the lowest attainable at that time with the method used. Therefore, no further assessment will be needed for the arsenic PRG exceedences in soil.
4. The Branch recommends low flow sampling techniques when sampling groundwater for metals.
5. Per the Guidelines, Section A.2.1.2.1, b., soil only needs to be "adequately sampled at intervals from ground surface to the water table. Examples of sampling intervals include 0 to 6 inches below ground surface, every five feet from 6 inches to the water table, and at the water table." Sampling the soil at one foot intervals is unnecessary. Also per the Guidelines, background soil samples only need to be taken if metals are detected in excess of applicable remedial goals in the soils at the site. Thus, for the metals in which there is currently no TCLP data, I would recommend obtaining that data prior to obtaining background samples. If background soil samples are needed, background soil samples only need to be collected from depths and soil types that are

representative of known contaminated soils. Additionally, delineation samples also only need to be taken from depths and soil types that are representative of known contaminated soils. If you want to have your consultant take the additional samples anyway, I would suggest having the additional samples held by the laboratory pending the results of the initial soil samples as long as hold times are not exceeded.

If you would like to submit a revised Phase II Remedial Investigation Plan incorporating my suggestions, please submit by July 29, 2009. If you plan to implement the current investigation plan, please submit a hard copy of the Phase II RI by **October 29, 2009**. In addition to the hard copy, please submit a copy of the submitted report in electronic PDF/A format. If you have any questions, please contact me at (910) 796-7340.

Sincerely,



Genevieve M. Henderson, P.G.
Hydrogeologist
Division of Waste Management, Superfund Section
Inactive Hazardous Sites Branch

Cc: IHSB – WiRO files
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