



March 16, 2016

053-3184E F/N 120

Mr. Hilary M. Thornton
United States Environmental Protection Agency, Region IV
Atlanta Federal Center, 4WD-SRSEB, 11th Floor
61 Forsyth Street, SW
Atlanta, GA 30303-8960

**RE: WARD TRANSFORMER SUPERFUND SITE OU2 SRI/FFS
PROGRESS REPORT FOR FEBRUARY 2016**

Dear Mr. Thornton:

On behalf of the Ward Transformer Site Trust (Trust), Golder Associates NC, Inc. (Golder) is submitting this progress report pursuant to paragraph 39 of the Administrative Settlement Agreement and Order on Consent (AOC) for Supplemental Remedial Investigation/Focused Feasibility Study (SRI/FFS) for Operable Unit 2 (OU2) between the Trust and the United States Environmental Protection Agency (EPA).

ACTIONS PERFORMED DURING THE REPORTING PERIOD

On February 1, 2016, Golder held a conference call with EPA to:

1. review the groundwater monitoring well installation and sampling data obtained to date in anticipation that the next groundwater sampling event scheduled for February 2016 would be the final event carried out by the Trust; and to
2. discuss Golder's opinion that, if the next sampling results do not indicate significant differences from previous results, that the Site groundwater quality is characterized and that Golder can proceed with preparing the Site Characterization Sampling Report (SCS Report) and the SRI Report.

From the data review and discussions, EPA concurred with Golder's opinion.

Golder conducted groundwater sampling from February 9 through February 11, 2016. Golder selected Test America (TA) in Nashville, Tennessee, to conduct the laboratory analyses for the February event since CompuChem, the laboratory previously approved by EPA for the Site, abruptly went out of business in January 2016. However, TA was not available because it had suffered a cyber-attack of its computer system and could not perform the analyses within the maximum holding time. Golder then selected Shealy Environmental Inc. (Shealy) of West Columbia, South Carolina, to perform the testing. Shealy is certified under EPA's Contract Laboratory Program through October 9, 2019. The Sampling and Analysis Plan tables, presented as Attachment 2, have been revised to incorporate Shealy's laboratory information. Shealy's Quality Assurance Manual is included on a computer disk in Attachment 1.

DATA RECEIVED

The sampling logs, data validation, and laboratory data packages from the February 2016 sampling event are provided on a computer disk in Attachment 1. The sampling results were similar to those of the previous events and will be summarized in the SCS Report.

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ANTICIPATED ACTIONS

Golder's subcontractor A&D Environmental Services Inc. will transport the investigation-derived waste for disposal to Waste Industries' Sampson County Disposal located in Roseboro, North Carolina, during the next reporting period. Golder plans to prepare and submit the SCS Report in April 2016.

TRUSTEES'S MONTHLY REPORT

The OU2 expenses as of February 29, 2016, paid out of the Escrow Account is provided in Attachment 3.

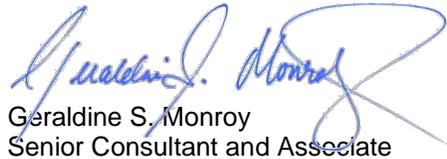
Should there be any questions regarding this Progress Report, please contact the undersigned or the Trust's Project Coordinator, Mr. Weir at 412-249-3118.

Sincerely,

GOLDER ASSOCIATES NC, INC.



Benjamin Draper, P.G.
Project Geologist



Geraldine S. Monroy
Senior Consultant and Associate

GM/BD/sdp

cc: Mr. William G. Weir, Civil & Environmental Consultants, Inc. (by email)
Mr. Daniel M. Darragh, Cohen & Grigsby, PC (by email)
Ms. Judith George, PCS Administration (USA), Inc. (by email)
Mr. Henry Lyon, Duke Energy Progress, LLP (by email)
Mr. Jason D. Witt, Murray Energy Corporation (by email)
Mr. Nile Testerman, NCDEQ (by email)

ATTACHMENT 1

Sampling Logs, Data Validation, and Laboratory Data Packages

ATTACHMENT 2

Sampling and Analysis Plan Revised Tables

**TABLE 2-1
Project Personnel**

Respondent Project Coordinator:	William G. Weir, P.G. Civil & Environmental Consultants, Inc. 333 Baldwin Road Pittsburg, PA 15205	Telephone: (412) 249-3118 Fax: (412) 429-2114 Email: bweir@cecinc.com
EPA Remedial Project Manager:	Hilary Thornton USEPA Region 4 61 Forsyth Street SW Atlanta, GA 30303	Telephone: (404) 562-8809 Fax: Email: Thornton.Hilary@epamail.epa.gov
SRI/FFS Manager:	Geraldine S. Monroy Golder Associates Inc. 3730 Chamblee Tucker Road Atlanta, GA 30341	Telephone (770) 496-1893 Fax: (770) 934-9476 Email: gina_monroy@golder.com
Field Team Leader:	Benjamin J. Draper Golder Associates NC, Inc. 5B Oak Branch Drive Greensboro, NC 27407	Telephone (336) 852-4903 Fax: (336) 852-4904 Email: benjamin_draper@golder.com
Quality Assurance Manager:	Cindi Lucas-Youmans Golder Associates Inc. 200 Century Parkway, Suite C Mt. Laurel, NJ 08054	Telephone (856) 793-2005 Fax: (856) 793-2006 Email: clucas@golder.com
Health and Safety Officer:	Christopher C. Brookshire Golder Associates Inc. 3730 Chamblee Tucker Road Atlanta, GA 30341	Telephone (770) 496-1893 Fax: (770) 934-9476 Email: chris_brookshire@golder.com
Laboratory Project Manager	Cathy Dover Shealy Environmental Services, Inc. 106 Vantage Point Drive West Columbia, SC 29172	Telephone (919) 616-1180 Fax: (803) 791-9111 E-mail: cdover@shealylab.com
Lab Quality Assurance Officer:	Wendy Plessinger Shealy Environmental Services, Inc. 106 Vantage Point Drive West Columbia, SC 29172	Telephone (803) 227-3167 Fax: (803) 791-9111 E-mail: wplessinger@shealylab.com

**TABLE 9-1
Analytical Methods, Sample Containers, Preservation, and
Analytical Hold Times for Aqueous Samples**

Parameter	EPA Analysis Methodology	Container		Minimum Sample	Preservation	Hold Time (1)
Total PCBs	SW-846 8082A	2-1000 ml	Amber Glass, Teflon-lined Lid	1000 ml	Cool 4 deg. C, dark	365 days (2)
VOCs (3)	SW-846 8260B	3-40 ml	Glass, Teflon- lined Lid	40 ml	Cool 4 deg. C, dark. HCl.	14 days

Notes:

(1) Hold time based upon day of sample collection not verified time of sample receipt.

(2) 365 days for extraction, 40 days for analysis after commencement date of extraction.

(3) VOC analysis for only 4 analytes: benzene, chlorobenzene, 1,4-dichlorobenzene, and 1,2,4-trichlorobenzene.
HCl – hydrochloric acid

**TABLE 11-1
Target Compounds of Interest and Reporting Limits for Groundwater**

TARGET PARAMETERS	MATRIX	UNITS	REPORTING LIMITS
PCBs as Aroclors	Groundwater	µg/L	
Aroclor-1016			0.4
Aroclor-1221			0.4
Aroclor-1232			0.4
Aroclor-1242			0.4
Aroclor-1248			0.4
Aroclor-1254			0.4
Aroclor-1260			0.4
Volatile Organic Compounds	Groundwater	µg/L	
Benzene			0.5
Chlorobenzene			0.5
1,4-Dichlorobenzene			0.5
1,2,4-Trichlorobenzene			0.5

**TABLE 12-1
Field And Laboratory Precision and Accuracy Criteria for Groundwater**

Parameters	Matrix	Field Precision	Laboratory QC Limits	
Method 8082	Groundwater			
Target Spike Compound			% Recovery	% RPD
Aroclor 1016		50%	70%-130%	30%
Aroclor 1260		50%	70%-130%	30%
Method 8260	Groundwater			
Target Spike Compound			% Recovery	% RPD
Benzene		50%	70%-130%	20%
Chlorobenzene		50%	70%-130%	20%
1,4-Dichlorobenzene		50%	70%-130%	20%
1,2,4-Trichlorobenzene	50%	70%-130%	20%	

Notes:

1. The laboratory QC limits are reassessed on an annual basis based upon actual QC data collected; they may change slightly over the course of the project.

ATTACHMENT 3

OU2 Escrow Account

The Ward Transformer Site Trust Fund
Total OU2 RI/FS Expenses
September 15, 2005 through February 29, 2016

Type	Date	Num	Name	Memo	Account	Class	Clr	Split	Amount	Balance
Civil & Environmental Consultants, Inc.										
Check	03/12/2014	1825	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,670.10	1,670.10
Check	04/18/2014	1837	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	3,422.50	5,092.60
Check	05/08/2014	1851	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,387.50	6,480.10
Check	06/18/2014	1876	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	2,867.50	9,347.60
Check	07/24/2014	1884	Civil & Environm...	Invoices #...	Contractors	OU2 RI...		PNC Bank ...	3,721.08	13,068.68
Check	08/28/2014	1899	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,665.00	14,733.68
Check	11/13/2014	1913	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	832.50	15,566.18
Check	12/18/2014	1931	Civil & Environm...	Invoices #...	Contractors	OU2 RI...		PNC Bank ...	1,850.00	17,416.18
Check	01/20/2015	1941	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,295.00	18,711.18
Check	02/23/2015	1949	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,942.50	20,653.68
Check	03/23/2015	1960	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,341.25	21,994.93
Check	04/14/2015	1964	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,248.75	23,243.68
Check	05/19/2015	1976	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,572.50	24,816.18
Check	06/09/2015	1982	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,202.50	26,018.68
Check	07/07/2015	1996	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,295.00	27,313.68
Check	07/29/2015	2006	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	462.50	27,776.18
Check	09/09/2015	2015	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	647.50	28,423.68
Check	11/04/2015	2029	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	323.75	28,747.43
Check	11/30/2015	2037	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,757.50	30,504.93
Check	12/29/2015	2041	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	1,110.00	31,614.93
Check	01/20/2016	2045	Civil & Environm...	Invoice #1...	Contractors	OU2 RI...		PNC Bank ...	647.50	32,262.43
Total Civil & Environmental Consultants, Inc.									32,262.43	32,262.43
Golder Associates, Inc.										
Check	09/24/2013	1764	Golder Associat...	Golder OU...	Contractors	OU2 RI...		PNC Bank ...	1,086.46	1,086.46
Check	03/27/2014	1826	Golder Associat...	VOID: Sto...	Contractors	OU2 RI...	X	PNC Bank ...	0.00	1,086.46
Check	05/08/2014	1852	Golder Associat...	Invoice #3...	Contractors	OU2 RI...		PNC Bank ...	23,818.75	24,905.21
Check	06/03/2014	1871	Golder Associat...	Invoice #3...	Contractors	OU2 RI...		PNC Bank ...	2,110.21	27,015.42
Check	06/09/2014	1872	Golder Associat...	OU2 RI/FS...	Contractors	OU2 RI...		PNC Bank ...	62,651.04	89,666.46
Check	07/24/2014	1883	Golder Associat...	Invoice #3...	Contractors	OU2 RI...		PNC Bank ...	610.28	90,276.74
Check	10/14/2014	1905	Golder Associat...	Invoices #...	Contractors	OU2 RI...		PNC Bank ...	4,378.79	94,655.53
Check	12/18/2014	1927	Golder Associat...	Invoices #...	Contractors	OU2 RI...		PNC Bank ...	57,931.05	152,586.58
Check	03/02/2015	1953	Golder Associat...	Invoices #...	Contractors	OU2 RI...		PNC Bank ...	60,070.23	212,656.81
Check	03/23/2015	1956	Golder Associat...	Invoice #4...	Contractors	OU2 RI...		PNC Bank ...	16,732.16	229,388.97
Check	04/14/2015	1965	Golder Associat...	Invoice #4...	Contractors	OU2 RI...		PNC Bank ...	5,400.80	234,789.77
Check	06/09/2015	1981	Golder Associat...	Invoice #4...	Contractors	OU2 RI...		PNC Bank ...	3,131.66	237,921.43
Check	06/10/2015	1987	Golder Associat...	VOID: Invo...	Contractors	OU2 RI...	X	PNC Bank ...	0.00	237,921.43
Check	06/29/2015	1993	Golder Associat...	Invoice #4...	Contractors	OU2 RI...		PNC Bank ...	437.75	238,359.18
Check	07/17/2015	2001	Golder Associat...	Invoice #4...	Contractors	OU2 RI...		PNC Bank ...	1,014.79	239,373.97
Check	08/31/2015	2010	Golder Associat...	Invoice #4...	Contractors	OU2 RI...		PNC Bank ...	55,872.60	295,246.57
Check	10/19/2015	2023	Golder Associat...	Invoice #4...	Contractors	OU2 RI...		PNC Bank ...	21,049.94	316,296.51
Check	11/04/2015	2030	Golder Associat...	Invoice #4...	Contractors	OU2 RI...		PNC Bank ...	5,671.82	321,968.33

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Accrual Basis

The Ward Transformer Site Trust Fund
Total OU2 RI/FS Expenses
September 15, 2005 through February 29, 2016

Type	Date	Num	Name	Memo	Account	Class	Clr	Split	Amount	Balance
Check	11/20/2015	2033	Golder Associat...	Invoice #4...	Contractors	OU2 RI...		PNC Bank ...	44,437.36	366,405.69
Check	01/20/2016	2042	Golder Associat...	Invoice #4...	Contractors	OU2 RI...		PNC Bank ...	7,543.64	373,949.33
Total Golder Associates, Inc.									373,949.33	373,949.33
TOTAL									406,211.76	406,211.76