

325IHSSF4051



DocumentID NONCD0002819

Site Name PLANTER'S WAREHOUSE

DocumentType Site Assessment Plan (SAP)

RptSegment 1

DocDate 7/24/2008

DocRcvd 7/25/2008

Box SF4051

AccessLevel PUBLIC

Division WASTE MANAGEMENT

Section SUPERFUND

Program IHS (IHS)

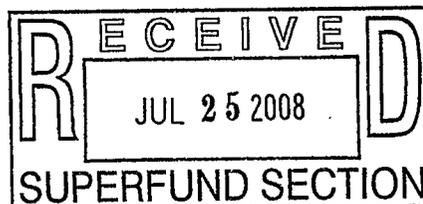
DocCat FACILITY



Geological Resources, Inc.

July 24, 2008

Ms. Genevieve Henderson, P.G.
Hydrogeologist II
NCDENR, Inactive Hazardous Sites Branch
Wilmington Regional Office
127 Cardinal Drive Extension
Wilmington, North Carolina 28405-3845



Re: Proposed Assessment Work Plan
Planters Warehouse Facility
US Highway 701 South Bypass and NC Highway 904 East
Tabor City, Columbus County

Dear Ms. Henderson,

Per your June 27, 2008 correspondence and subsequent telephone conversations with Terry Kennedy, Geological Resources, Inc. (GRI) submits this work plan for additional assessment activities at the above referenced site (Figure 1). The purpose of the work plan is to satisfy requirements from the NCDENR's Inactive Hazardous Sites Branch (IHSB). This plan contains a summary of historical assessment activities and proposed additional assessment activities.

Summary of Historical Assessment Activities

A Phase II Site Characterization was conducted at the site in January 2003 by Clark Environmental Services P.C (Clark). According to data contained in the Phase II report, recognized environmental concerns (RECs) were addressed during the Phase II assessment activities. Specifically, the RECs were identified as a 10,000-gallon above ground nitrogenous fertilizer tank. A total of 8 monitoring wells (MW-1 through MW-6, DW-1 and DW-2) were installed at the site between October - December 2002.

Ground water samples were collected from the monitoring wells and submitted for analyses for nitrate, nitrite, TKN and ammonia. Concentrations of nitrate and nitrite that exceeded the 2L standards were reported in the ground water sample collected from MW-1. The concentrations of nitrate also exceeded the 2L Standards in MW-2 through MW-4 and DW-2. Detectable concentrations of TKN and ammonia were reported in the ground water samples collected from monitoring wells MW-1 through MW-6, DW-1 and/or DW-2. Please note that the 2L standards for TKN and ammonia are not specified. On January 7, 2003, Mr. Charles F. Stehman, with NCDENR reportedly met with Mr. G. Trent Burroughs and Clark to discuss remediation plans. It was reportedly proposed to pump the contaminated water and distribute it on adjacent farmland. Mr. Stehman agreed with the proposed plan as long as a report documenting the activities would be submitted to NCDENR.

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Phone: (704) 845-4010 / (888) 870-4133 Fax: (704) 845-4012

Due to a pending real estate transaction, GRI performed a Phase I Environmental Site Assessment (ESA) in January 2008. Based on the previous ground water incident at the site GRI recommended a ground water sampling event to determine the current conditions at the site. GRI personnel returned to the site on April 16, 2008 to sample all monitoring wells associated with the incident. Ground water samples from monitoring wells MW-1 through MW-3, MW-5 and DW-1 were collected and analyzed for nitrates, nitrites, ammonia and TKN. Please note that monitoring wells MW-4, MW-6 and DW-2 were either not located or have been destroyed. A concentration of nitrate/nitrite that exceeded the 2L standard was reported in the ground water sample collected from MW-2. Detectable concentrations of nitrate/nitrite, ammonia and/or TKN were reported in all of the ground water samples collected. Based on these results, the wells were pumped in May 2008. The wells were sampled on May 27, 2008 and nitrate concentrations exceeded the 2L standards in the ground water samples collected from MW-1 and MW-2.

Based on this information the wells were pumped again in June 2008 and re-sampled. The concentrations of nitrate reported in MW-1 was less than the 2L standard on June 5, 2008 and the concentration of nitrate reported in the ground water sample collected from MW-2 on June 16, 2008 was less than the 2 L standard. To date, approximately 2,575-gallons of water has been removed from the site and distributed on adjacent farmland as suggested in the April 2003 letter. A report was submitted to NCDENR on June 24, 2008.

On June 27, 2008 a NORR was issued to Mr. Trent Burroughs of ABCD Enterprises, LLC.

A request to the NCDENR for a status of no further action has not currently been granted. According to NCDENR personnel additional assessment is required at the site.

Proposed Additional Assessment Activities

As discussed in the telephone conversation, GRI proposes to install two North Carolina Type II monitoring wells at the locations depicted on **Figure 2**. Ground water samples will be collected from each of the permanent monitoring wells using low flow techniques. In addition, ground water samples will be collected from MW-1 through MW-3, MW-5 and DW-1. Collected ground water samples will be analyzed for ammonia by EPA Method 350.1.

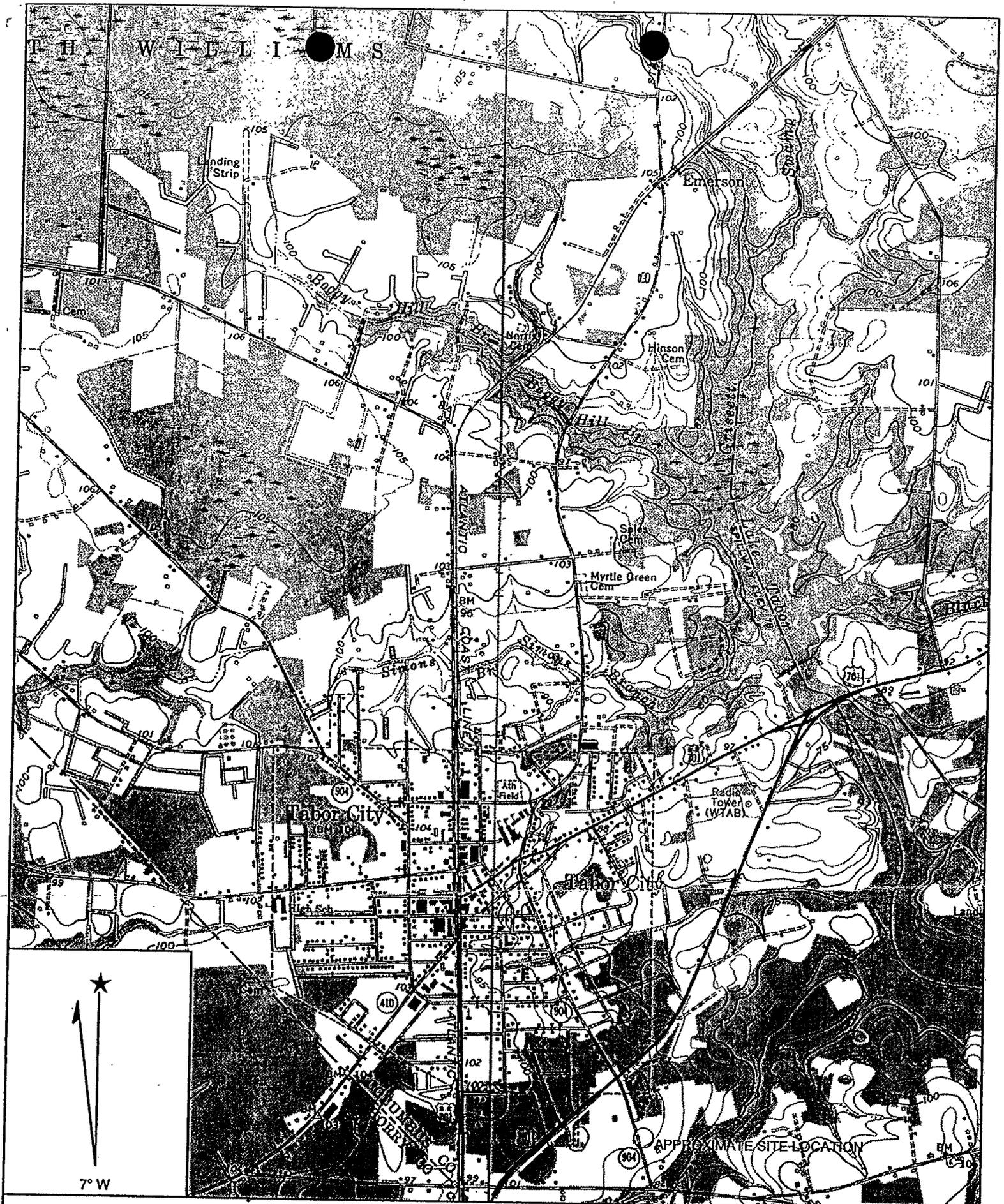
Due to financial considerations, a timely review and approval of this work plan is respectfully requested.

Please contact me or Terry Kennedy at (704) 845-4010 with questions or comments.

Sincerely,
Geological Resources, Inc.

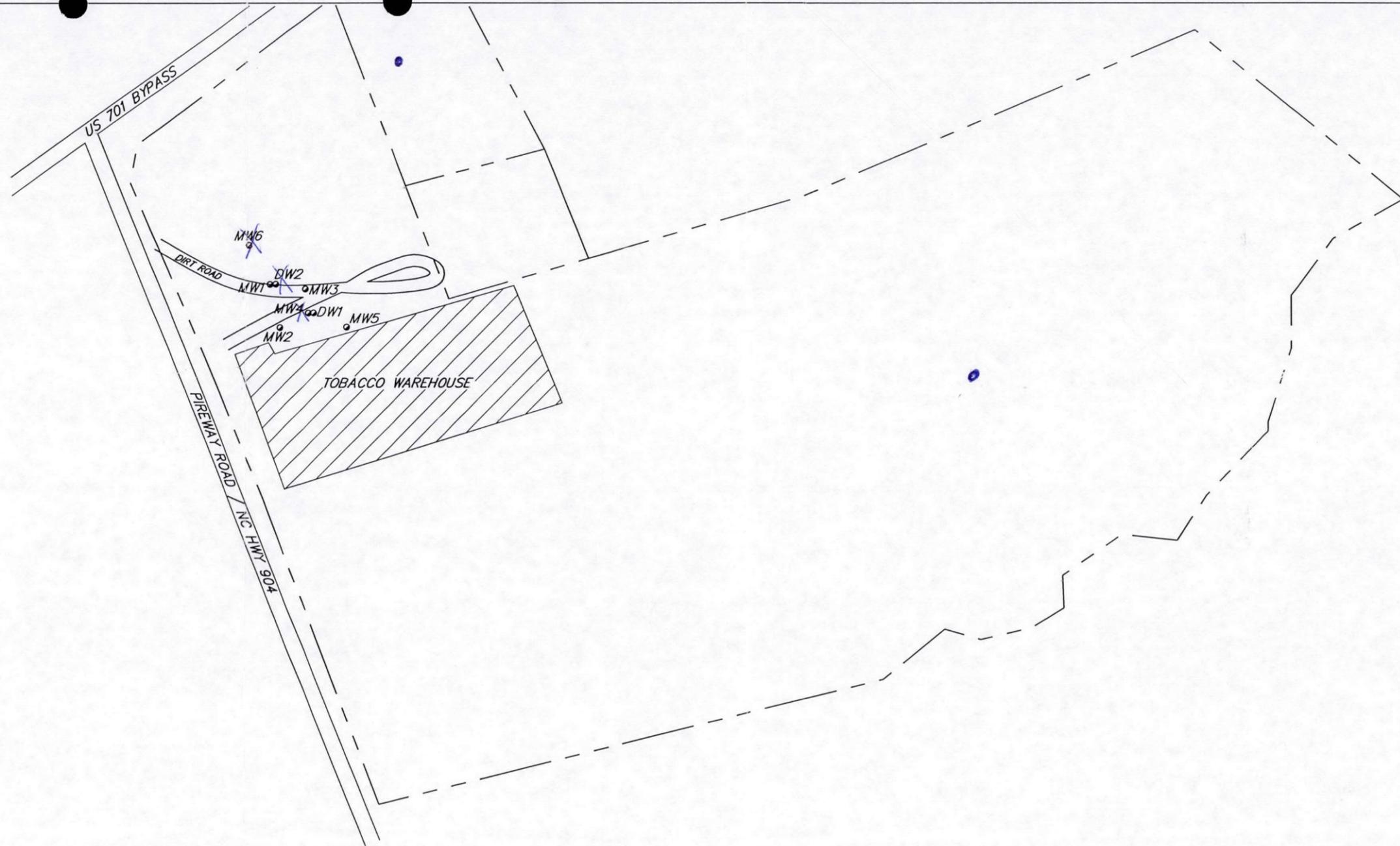

Nicole Long
Project Manager

enclosures



Name: TABOR CITY EAST
 Date: 5/7/108
 Scale: 1 inch equals 2000 feet

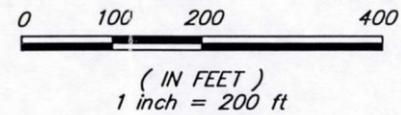
Location: 034° 09' 42.2" N 078° 52' 29.5" W
 Caption: FIGURE 1
 PLANTERS WAREHOUSE
 SITE LOCATION MAP



LEGEND

- TYPE II MONITORING WELL
- PROPERTY LINE

• Proposed location of Type II monitoring wells.
 mw-6, mw-4, Dw-2 are destroyed.



SITE MAP			
Planter's Warehouse		1003 Pireway Road	
Tabor City, Columbus County, NC		Incident #	
Date:	07/22/08	Drawn by:	AWB Figure: 2