

Subject: Waccamaw Transport Facility Proposed Assessment Work Plan
From: "Katharine Lawther" <kwl@geologicalresourcesinc.com>
Date: Wed, 16 Jul 2008 15:19:40 -0400
To: <GINNY.HENDERSON@NCMAIL.NET>
CC: "Howell Clark" <rhc@sboil.com>, "Anthony Scarbraugh" <ads@geologicalresourcesinc.com>, "TD Kennedy" <tdk@geologicalresourcesinc.com>, "JM Brown" <johnbrown@geologicalresourcesinc.com>, "Tomie Benton" <tmb@geologicalresourcesinc.com>

Dear Ms. Henderson:

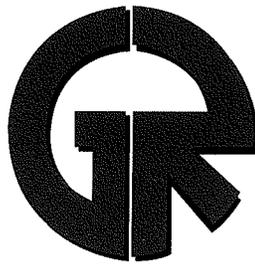
Attached is the Proposed Assessment Work Plan for the Waccamaw Transport Facility in Wilmington, New Hanover County. I am mailing the hard copy to you today. Please let me know if you have any problems with the attachment. If you have any questions regarding the work plan, please call either John Brown at 704-845-4010 or Terry Kennedy at 704-617-1730.

Thank you,

Katharine W. Lawther
Geological Resources, Inc.
2301-F Crown Point Executive Drive
Charlotte, North Carolina 28227
704-845-4010
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888-870-4133
EMERGENCY SPILL RESPONSE: 866-744-5220

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Geological Resources, Inc.

July 16, 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
Waccamaw Transport Facility
1106 South 2nd Street and 1109 South Front Street
Wilmington, New Hanover County

Dear Ms. Henderson,

Per your July 2, 2008 correspondence, 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 Environmental Site Assessment (ESA) was conducted at the site in November 2007 by Henry Nemargut Engineering Services. According to data contained in the Phase II ESA, recognized environmental concerns (RECs) were addressed during the Phase II assessment activities. Specifically, the RECs were identified as a former diesel UST basin, a heating oil UST basin, an exterior concrete pad containing waste oil storage drums and an exterior concrete pad formerly used for vehicle engine repair. A total of 5 soil borings (B-1 through B-5) and one temporary monitoring well (TW-1) were completed at the site in November 2007. Based on field screening with a PID, a total of 4 soil samples were submitted for laboratory analyses.

Soil boring B-1 was located in the driveway on the 1109 South Front Street property. Soil sample screening results were below the PID detection level; therefore no sample was submitted for laboratory analyses. Soil borings B-2 and B-5 were located adjacent to the existing and within the former UST basins, respectively. The soil samples with the highest PID readings (B-2-7' and B-5-10') were submitted for laboratory analyses for diesel- and gasoline-range total petroleum hydrocarbons (TPH) by EPA

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Methods 3550/5030/8015. Based upon the laboratory analytical report, no detectable concentrations of TPH were reported in the samples collected from B-2 and B-5.

Soil borings B-3 and B-4 were located adjacent to the engine repair and drum storage pads, respectively. Soil samples were collected in the native soils and submitted for laboratory analyses by EPA Method 8260. Detectable concentrations of tetrachloroethene (PCE) were reported in soil samples B-3-5' (0.0076 mg/kg) and B-4-5' (0.26 mg/kg). Both detectable concentrations exceeded the NCDENR soil-to-ground water maximum soil contaminant concentration (MSCC) for PCE (0.0074 mg/kg).

Soil boring B-2 was completed as a temporary monitoring well (TW-1). A ground water quality sample (TW-1A) was collected and submitted for laboratory analyses by EPA Method 6210D. Detectable concentrations of PCE and chloromethane which did not exceed the North Carolina drinking water standard established in T15A NCAC .0202L were reported in the ground water sample.

Based upon the results of the Phase II ESA, GRI was retained to assess the extent of PCE in the soil. Six soil borings (SB-1 through SB-6) were advanced, each to a depth of six feet, and soil samples were collected from each at a depth of 5-6 feet. The collected soil samples were analyzed by EPA Method 8260. Detectable concentrations of ethylbenzene, xylenes, naphthalene, 1,3,5-trimethylbenzene and/or 1,2,4-trimethylbenzene which did not exceed the MSCCs were reported in soil samples SB-2(5-6) and SB-3(5-6). Detectable concentrations of PCE were reported in soil samples SB-2(5-6) through SB-6(5-6). The concentrations of PCE reported in soil samples SB-2(5-6) through SB-5(5-6) exceeded the soil-to-ground water MSCC. None of the reported concentrations exceeded the Residential MSCC. Based on this data, a proposed excavation area was determined.

On February 18 and 19, 2008, GRI staff supervised the excavation of approximately 346.20 tons of soil from the identified areas of soil contamination. The excavation was limited within two feet of the on-site structure due to concerns of compromising the structural integrity of the building.

At the conclusion of over-excavation activities, confirmation soil samples CS-1(7-8), CS-2(7-8), CS-3(7-8), CS-4(7-8) and CS-5(8.5-9.0) were collected along the sidewalls and the bottom of the excavation. Soil samples were submitted for laboratory analyses using EPA Method 8260. A detectable concentration of PCE reported in CS-4(7-8) exceeded the soil-to-ground water MSCC; the concentration did not exceed the Residential MSCC.

On April 8, 2008, GRI staff supervised the excavation of approximately 31.62 tons of additional soil from the vicinity of CS-4 (7-8). Subsequent to over-excavation activities confirmation soil samples CS-6(6-7) and CS-7(9) were collected along the northern sidewall and the bottom of the excavation basin, respectively. Soil samples were submitted for laboratory analyses using EPA Method 8260. Detectable concentrations of PCE reported in CS-6(6-7) and CS-7(9) exceeded the soil-to-ground water MSCC; the concentrations did not exceed the Residential MSCC. No further soil excavation could be conducted due to the potential for undermining the existing on-site structure.

GRI personnel contacted Ms. Ginny Henderson with the NCDENR-DWM on April 16, 2008 concerning assessment and remedial activities conducted at the site to date and limitations for future excavation. It was recommended that GRI collect TCLP samples in the approximate location of soil borings CS-6 and CS-7 to confirm removal of PCE contaminant concentrations in excess of the soil-to-ground water

MSCC. Based on this recommendation, GRI personnel mobilized to the site on April 24, 2008. Two soil borings were advanced in the approximate locations of soil samples CS-6 and CS-7. Soil samples from CS-8 and CS-9 were collected from 7 and 9 feet, respectively. Soil samples were submitted for laboratory analyses using TCLP for volatile organic compounds. No detectable concentrations of PCE were reported in samples CS-8(7) and CS-9(9).

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

GRI proposes to advance four soil borings and install three North Carolina Type II monitoring wells at the locations depicted on **Figure 2**. Soil samples will be collected at five foot intervals from the surface to just above the seasonal high water table during advancement of the soil borings and monitoring wells. Soil samples from borings advanced in the former excavation area will only be collected in native soil below the excavation backfill. The collected soil samples will be analyzed by EPA Methods 8260 and 8270 and for the 14 hazardous substance list metals.

Ground water samples will be collected from each of the permanent monitoring wells using low flow techniques. Collected ground water samples will be analyzed by EPA Method 6210D. If there are detectable concentrations of Method 8270 compounds and/or metals exceeding the soil-to-ground water MSCCs reported in the collected soil samples, then the ground water sample(s) analyses will be expanded to include EPA Method 625 plus 10 TICs and metals.

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

Please contact me or John Brown at (704) 845-4010 with questions or comments.

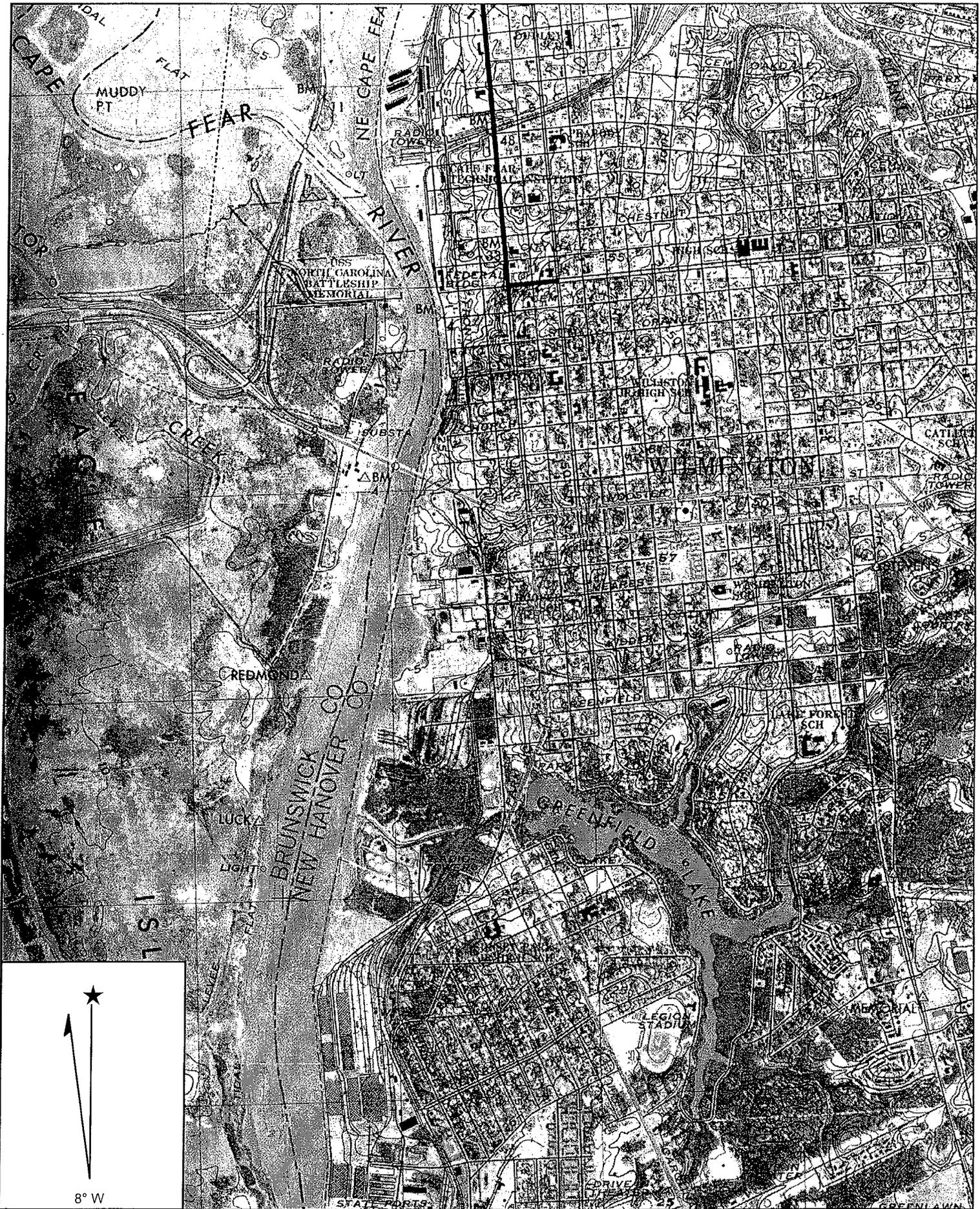
Sincerely,
Geological Resources, Inc.



Terry Kennedy, P.G.

enclosures

FIGURES

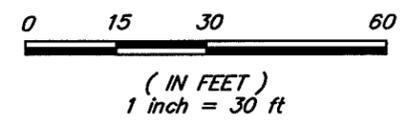
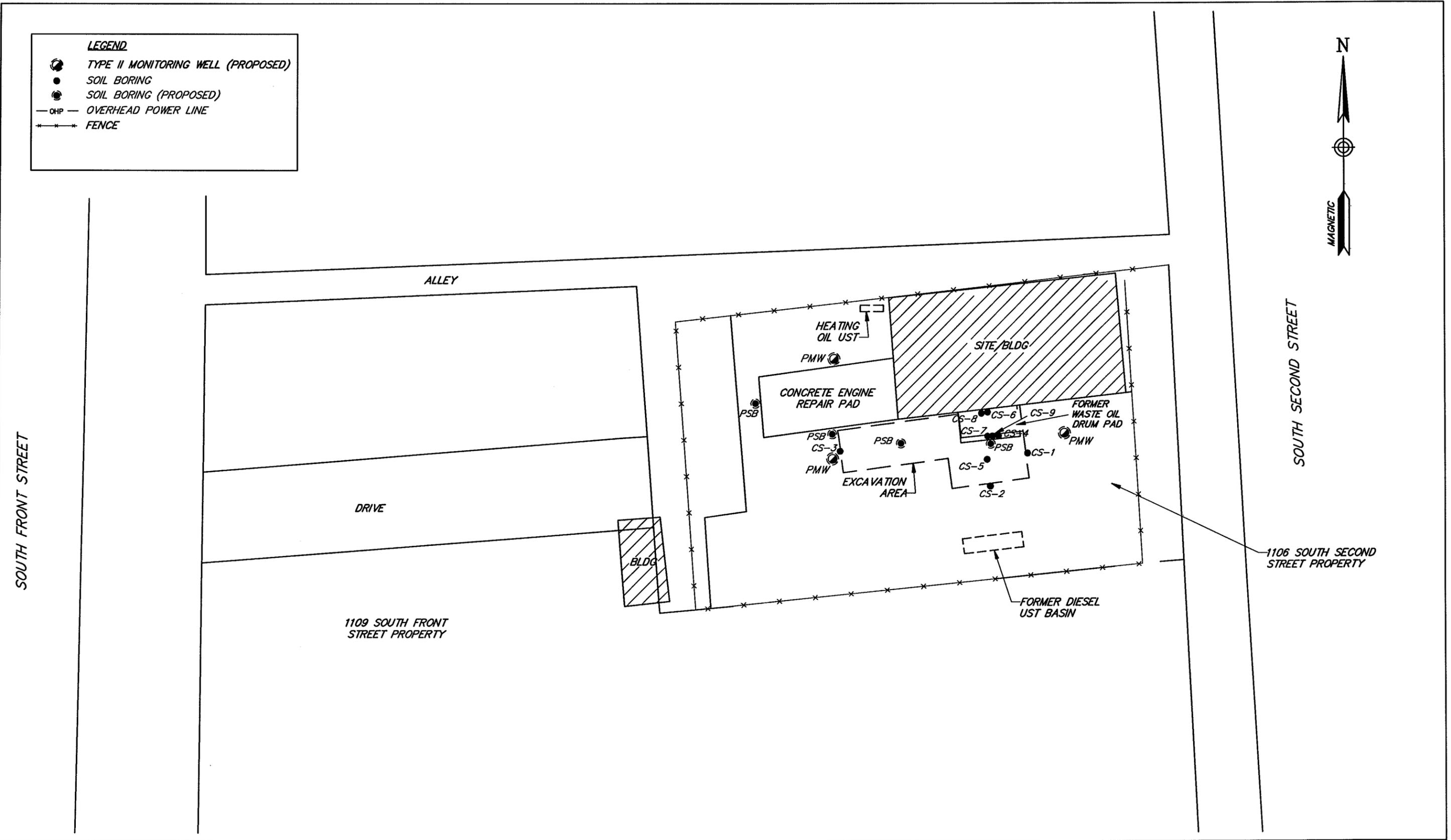


Name: WILMINGTON
 Date: 3/5/108
 Scale: 1 inch equals 2000 feet

Location: 034° 13' 16.3" N 077° 56' 49.5" W
 Caption: FIGURE 1
 SITE LOCATION MAP
 WACCAMAW TRANSPORT

LEGEND

- TYPE II MONITORING WELL (PROPOSED)
- SOIL BORING
- SOIL BORING (PROPOSED)
- OHP — OVERHEAD POWER LINE
- FENCE



PROPOSED SAMPLING LOCATIONS			
Waccamaw Transport, Inc.		1109 S. Front St. & 1106 S. Second St.	
Wilmington, New Hanover County, NC		Incident #	
Date:	7/15/08	Drawn by:	AWB
			Figure: 2