



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

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

May 6, 2009

Denise A. Wood  
Director of Environmental Compliance  
Corporate Environmental Services  
Mohawk Industries, Inc.  
P.O. Box 1006  
Dalton, GA 30722

Re: Response to Mohawk Industries, Inc. correspondence dated April 29, 2009  
Mohawk-Karastan Plant  
2007 Dickinson Ave.  
Greenville, Pitt County  
NONCD0002874

Dear Ms. Wood:

I have reviewed your letter dated April 29, 2009, prepared for the Mohawk-Karastan Spinning Plant ("site"). Based on the information available to date, this site cannot be removed from the Inactive Hazardous Sites Branch's (Branch) inventory at this time. My comments to your letter are as follows:

1. The concentration of arsenic detected in the groundwater sample from MW-1 was not above its 2L standard; however, as stated in Section 4.1.2 of the Guidelines for Assessment and Cleanup:

*"Remediation goals for groundwater are equal to the lower of the following levels: (1) the permanent and interim groundwater standards established under 15A NCAC 2L; (2) the MCL; and (3) the non-zero MCLG."*

The Maximum Contaminant Level (MCL) for arsenic is lower than the 2L for arsenic, thus the MCL is the applicable standard for arsenic and the MW-1 concentration exceeded its MCL.

2. The Branch acknowledges that di-n-butyl phthalate was not detected in the groundwater at the site during the September 2008 sampling event and is not considered an issue at the site.
3. The Branch also acknowledges that the pH levels in the soil around the acetic acid tank were generally within a normal range, but would like to note that several of the samples had pH levels that were higher than would be expected.
4. Soil samples KA1, KA2 and DH contained concentrations of several contaminants, including metals and PAHs, which exceeded either the Branch's Protection of Groundwater or Health Based remedial goals (RGs). Please also be advised that the TCLP procedure referenced in your letter is for determining if a material is classified as a "hazardous waste" for disposal purposes.

Material that is not classified as a hazardous waste by characteristic may still require remediation because contaminant concentrations exceed the Branch's Health Based and/or Protection of Groundwater RGs. In addition, the TCLP procedure can be used to determine if a material meets the Protection of Groundwater RGs but would not be applicable when the total contaminant concentrations exceed the Health Based RGs. In the Notice of Regulatory Requirements (NORR), the Branch was not naming a particular source of the contaminants, only stating that hazardous substances exist at the site at levels in excess of our RGs. No background samples were taken therefore comparison of the metal or PAH concentrations to background levels cannot be done at present. Without additional assessment, this site cannot be closed.

This site is currently not a priority and action is not required at this time, however, the site will remain in the Branch's inventory and will be addressed when it becomes a priority. If you would like to volunteer to conduct additional assessment, please submit the Site Cleanup Questionnaire requested in the NORR so that the Branch can determine if the site can enter the Registered Environmental Consultant Program, which is the voluntary cleanup program for sites that are not currently priorities. 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  
Greg Jones, Corporate Environmental Services, P.O. Box 1006, Dalton, GA 30722  
Michael Pilkington, Karastan Spinning Plant, 2007 Dickinson Ave., Greenville, NC 27834  
Katie Jarvis, Groundwater Management Associates, Inc., 4300 Sapphire Ct., Ste. 100, Greenville, NC 27834