North Carolina Department of Environment and Natural Resources
Dexter R. Matthews, Director
Division of Waste Management
Michael F. Easley, Governor
William G. Ross Jr., Secretary

October 15, 2008

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

Re: Work Plan Response
Mohawk-Karastan Plant
2007 Dickinson Ave.
Greenville, Pitt County

Dear Ms. Wood:

The Inactive Hazardous Site Branch ("Branch") of the Division of Waste Management's Superfund Section has reviewed the Groundwater Monitoring Report that was prepared by Groundwater Management Associates, Inc. (GMA) and your work plan letter for the above reference site. These items were received on October 14, 2008. The work plan and groundwater monitoring report do not address all the issues and areas of the site requested in the Branch's Work Plan Request Letter dated August 22, 2008. The specific deficiencies are:

1. The groundwater samples from all existing monitoring wells should have also been analyzed for volatile organic compounds using EPA Method 8260, the 14 hazardous substance list metals, pesticides, pH and for any additional hazardous substances used at the site that would not be detected by the above analyses using the appropriate EPA approved method.

2. The soil samples from around the acetic acid tank containment basin only need to be tested for pH. A soil sample from beneath the containment basin was also requested.

3. Soil samples adjacent to the kettle area should be taken every five feet from the surface to the water table. A single surficial soil sample in this area is not sufficient. In addition to the proposed volatile organic and pH analyses, the samples should be analyzed for semi-volatile organic compounds using EPA Method 8270, the 14 hazardous substance list metals, pesticides and for any additional hazardous substances used at the site that would not be detected by the above analyses using the appropriate EPA approved method. Surface soil samples for volatile organic analyses should be collected at a depth of 6-12 inches below ground surface and samples collected for all other analyses should be collected at a depth of 0-6 inches below ground surface.

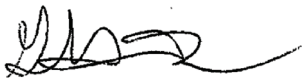
4. At least one soil sample should be taken from adjacent to chem set building's drain trough where it exits from the building. The soil sample should be collected directly below the drainage pipe. The sample should be analyzed for volatile and semi-volatile organic compounds using EPA Methods 8260 and 8270, the 14 hazardous substance list metals, pesticides, pH and for any additional hazardous substances used at the site that would not be detected by the above analyses using the appropriate EPA approved method.

5. At least one soil sample should be taken from adjacent to the dye house's drain trough where it exits from the building. The soil sample should be collected directly below the drainage pipe. The sample should be analyzed for volatile and semi-volatile organic compounds using EPA Methods 8260 and 8270, the 14 hazardous substance list metals, pesticides, pH and for any additional hazardous substances used at the site that would not be detected by the above analyses using the appropriate EPA approved method.

You may proceed in a phased approach, submitting the results of the soil assessment and additional analyses of the existing monitoring wells prior to installing any additional monitoring wells. Based on the results of the initial assessment, sampling of the groundwater in the kettle area, the chem set building and the dye house, may be necessary.

Please submit a revised work plan by November 20, 2008. If no work plan is received, the Site will be added to the Branch's inventory of sites. If you have any questions, please contact me at (910) 796-7340.

Sincerely,



Genevieve M. Henderson, P.G.
Hydrogeologist II
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