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To: Landon Davidson Fax No.: 663-6040
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From: Max E. Justice Client Matter: 14823

Date: October 30, 1996

Re: Reeves Brothers - Osage Plant - Bessemer City, NC

Letter attached

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MAX E. JUSTICE
PARTNER

October 30, 1996

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VIA FACSIMILE -- 704-663-6042

Mr. G. Landon Davidson
Mooresville Regional Office
Division of Water Quality
P. O. Box 950
Mooresville, NC 28115-0950

FILE NUMBER

DIRECT DIAL

(704) 333-9010

**RE: Reeves Brothers, Inc. - Osage Plant
Bessemer City, North Carolina**

Dear Landon:

We have reviewed your comments and the status of the above situation. I have asked Aware to thoroughly review available information and to prepare a supplement to the report that we previously submitted for your review. Attached is a copy of the supplemental report from Aware. So that we can all understand where we are, I would request that we have an opportunity to sit down with you (and perhaps your supervisor) so that we can all understand where we are now and where we are going. I realize that you all have a lot of demands on you from a work standpoint but I would hope that we could get together as soon as possible. As you know, we are trying to clear this property for a possible transaction so that it can be returned to beneficial use to the community.

I have spoken with a Reeves representative and we are requesting, if possible, to meet with you folks some time on the morning of Friday, November 1st. I understand this is short and if this does not suit, please let me know when we can meet.

I appreciate your assistance.

Very truly yours,



Max E. Justice

MEJ/mcs
Enc.



VIA TELECOPY

October 30, 1996

Mr. G. Landon Davidson
Hydrogeologist
North Carolina Department of Environment, Health
and Natural Resources
Division of Water Quality
919 North Main Street
Mooresville, North Carolina 28115

Re: Assessment Review Summary
Reeves Brothers, Inc. Osage Plant
Bessemer City, NC
AEI Project No. N156-33

Dear Mr. Davidson:

Mr. Max Justice of Parker, Poe, Adams & Bernstein, LLP has asked us to supplement our *Site Soil and Groundwater Investigation Report* which we understand has been submitted to your agency. AWARE Environmental Inc. (AEI) has reviewed available soil and groundwater assessment data regarding the Reeves Brothers, Inc. (RBI) Osage Plant in Bessemer City, North Carolina (see attached Figure 1, site location map) to determine whether there is sufficient site assessment data to show that site groundwater found to contain chlorinated organic compounds has originated from an off-site source. Site environmental assessment data available for AEI's review included S&ME's *Phase II Environmental Survey Report*, The Fletcher Group's *UST Closure and Soil Remediation Assessment Report*, and AEI's *Site Soil and Groundwater Investigation Report*. A summary of the findings of these site investigations as they relate to the constituents of concern (COCs) is provided below

S&ME Data Summary

The S&ME report summarizes sampling and analytical data acquired from the former underground storage tank area, former coal storage area, the shop area, former drum storage area, paint room, and sanitary and stormwater sewers. S&ME advanced a total of 21 soil borings at the facility to collect soil samples for analytical testing (see attached Figure 2, S&ME sample location map). No groundwater sampling was performed by S&ME. One of

the constituents of concern (COCs: i.e., tetrachloroethene, trichloroethene, chloroform and cis-1,2-dichloroethene) was detected in one (1) shallow soil sample collected in areas of concern identified by S&ME at the Osage Plant. Cis-1,2-dichloroethene was detected at a concentration of 160 $\mu\text{g}/\text{kg}$ in sample BC1-5'. Due to a sample matrix interference caused by the presence of #5 fuel oil hydrocarbons in the soil sample, the reported detection limit for volatile organics was elevated to $< 100 \mu\text{g}/\text{kg}$. Soil boring BC1 appears to be located approximately 4 to 5 feet east of the subject stormwater drain located at the southern boundary of the site. Other soil borings advanced by S&ME in proximity to the stormwater drain were BC9 and BC12. Both borings were advanced in the vicinity of a catch basin situated along the subject stormwater drain near the paint room. COCs were not detected in samples collected from these borings.

Further, S&ME advanced soil borings BC10, BC11 and BC12 in proximity to the shop, which is situated between the production building and the portion of the stormwater drain at the southern boundary of the site. Boring BC10 was advanced to and sampled at a depth of 10 feet below grade. Borings BC11 and BC12 were advanced to and sampled at depths of 7.5 feet below grade. COCs were not detected in soil samples collected by S&ME from any identified areas of concern that were located upgradient of the identified groundwater impacts.

The Fletcher Group Data Summary

Because the assessment and remediation work conducted at the site by The Fletcher Group was solely concerned with petroleum hydrocarbons associated with the in place abandonment of two (2) #5 fuel oil underground storage tanks (USTs), COCs were not assessed as a result of this previous site work.

AEI Data Summary

AEI documented the advancement of a total of eight (8) soil borings at the Osage Plant to collect samples for analytical testing (see attached Figure 3, AEI sample location map). Soil boring/ temporary well W-2, located within about 10 feet of S&ME's boring BC1 in which 160 $\mu\text{g}/\text{kg}$ cis-1,2-dichloroethene was detected, may have been advanced through the area adjacent to the 20,000-gallon UST in which petroleum impacted soils were previously excavated by The Fletcher Group to a depth of 10 feet below grade. Thus, the shallow soils assessed likely would have been backfill materials. A soil sample was collected by AEI at a depth of 20 feet below grade for volatile organic analysis. COCs were not detected in this sample. These data would indicate that the presence of cis-1,2-dichloroethene in shallow soils in this area was likely the result of a minor release of COCs from the adjacent stormwater drain.

Another soil boring/temporary well W-1 was advanced adjacent to an upgradient catch basin along the subject stormwater drain. Again a sample was collected at a depth of 20 feet for

analytical testing. COCs were not detected in this sample. COCs were not detected in any other samples collected from similar depths from borings located across the site.

Combining S&ME's shallow soil data with AEI's deeper soil data, a source of COCs was not found on the Osage Plant site which would cause the groundwater impacts identified at the southern boundary of the site or at the off-site stormwater outfall situated across Alabama Avenue to the south.

Further, AEI documented the advancement of a mechanized soil boring/temporary well (OF) at the stormwater outfall located to the south across Alabama Avenue on property also owned by RBI (see attached Figure 3, AEI sample location map). No COCs were detected in the soil samples collected by split-spoon sampler at five-foot intervals to a depth of 20 feet within the boring. Tetrachloroethene was detected at a concentration of 60 µg/l in a shallow groundwater sample collected from a temporary well installed in boring OF. The absence of COCs in the overlying vadose soils and the lower concentration of tetrachloroethene in the groundwater sample collected from the outfall well versus on-site well W-2 may be the result of frequent soil flushing which is likely occurring beneath the outfall following rainfall events. The moderately to highly mobile COCs would likely be flushed from the silty soils beneath the outfall and any leached COCs would occur at trace levels or at levels which would be significantly diluted in the underlying shallow groundwater. The absence of trichloroethene in the outfall groundwater sample is not surprising in that its concentration in sample W-2 was 2.1 µg/l. Further, trichloroethene is also a degradation product of tetrachloroethene and may not be a primary constituent within the local groundwater.

A grab sediment sample (OF-Grab) was collected from detritus which had been deposited at the toe of the outfall. Tetrachloroethene and two other constituents, carbon disulfide and acetone, were detected in the outfall sediment sample. The presence of these compounds at the outfall indicates that COCs have been discharged into the stormwater drain. Tetrachloroethene, carbon disulfide and acetone have not been detected in soils at the subject property and available data suggest that these compounds have not emanated from any areas of concern identified by S&ME or AEI at the site.

Conclusions

The following conclusion were drawn from AEI's review of the available assessment data for the subject facility:

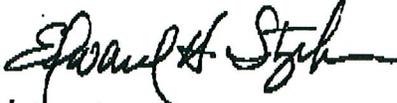
- 1) Cis-1,2-dichloroethene was detected by S&ME in shallow soils adjacent to the stormwater drain situated at the southern boundary of the site.

- 2) COCs were not detected by AEI in soils situated near the water table below the stormwater drain situated at the southern boundary of the site.
- 3) COCs were detected in a groundwater sample collected near the stormwater drain at the southern boundary of the site.
- 4) COCs were not detected by S&ME or AEI in shallow or deeper unsaturated soils or shallow groundwater at an upgradient catch basin located along the subject stormwater drain adjacent to the paint room.
- 5) COCs were detected by AEI in ditch sediments and shallow groundwater at an off-site stormwater outfall situated to the south of the subject site.
- 6) The stormwater drain appears to be the source for a discharge of tetrachloroethene to the outfall sediments and shallow groundwater beneath the off-site stormwater outfall.
- 7) Soil sampling by S&ME and/or AEI in areas of concern (e.g., paint room, shop, and former drum storage area) did not detect COCs in the area situated upgradient of the identified groundwater impacts.
- 8) It may be inferred from the assessment data that an apparent release of COCs has occurred in the portion of the stormwater drain situated between the catch basin adjacent to the paint room and the southern boundary of the site.
- 9) RBI has carefully investigated the historical uses of the plant and the use of the stormwater drain both on-site and off-site of its property. This investigation has revealed that tetrachloroethene has not been used at the facility. Further, tetrachloroethene was not found in shallow or deeper unsaturated soil samples collected from on-site areas of concern during previous site assessments.
- 10) Upgradient off-site sources for COCs are known including an auto garage, printing machine and parts cleaning operation, a forensics laboratory, an auto junkyard, and a garage and auto parts facility.

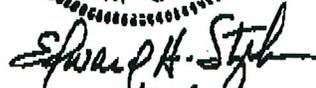
Based upon the results of the previous site assessments and the historical use of the facility, RBI does not believe that it has contributed to the identified site groundwater impacts. The assessment data show that the stormwater drain is the most likely source of the COCs. On-site sources for COCs have not been found in areas of concern identified by two (2) independent environmental consultants. Off-site land use upstream of the plant and the assessment data would suggest that an off-site source is more likely.

Upon your review of this information, we trust that you will conclude that RBI has not contributed to the identified site or off-site groundwater impacts and that their potential responsibility can be absolved. We appreciate your consideration of this matter. Should you have any questions or if you need any additional information, please contact me. If a meeting with RBI representatives and its consultants would be useful, we would like to discuss this matter with you.

Sincerely,
AWARE Environmental Inc.



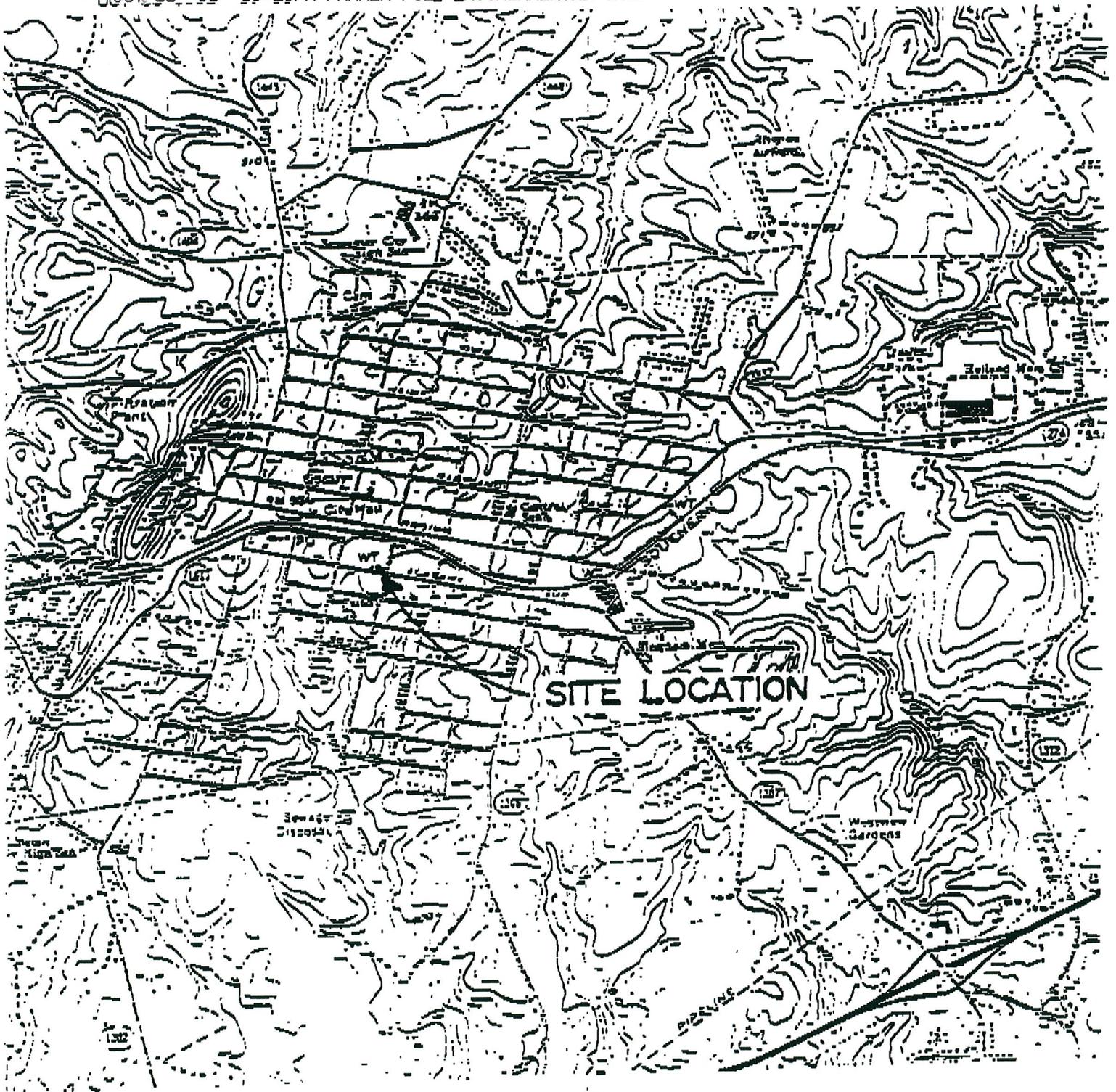
Edward H. Stephens, P.G.
Senior Hydrogeologist


10/30/96

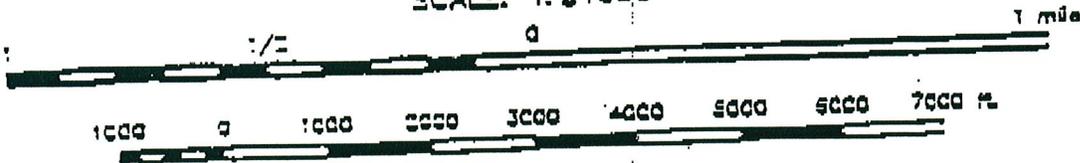
Attachments

cc: File
M. Smith, AEI

21423



SCALE: 1:24000



Source:
 USGS, Bessemer City, NC
 Quadrangle Map, 1973

Figure 1
 SITE LOCATION MAP



AWARE ENVIRONMENTAL INC