



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

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

June 13, 2013

Mr. John Stewart
ECS Carolinas, LLP
4811 Koger Boulevard
Greensboro, NC 27407

Re: Project Audit
Wrightsville Ave.
Wilmington, New Hanover County, NC
Site ID No. NONCD0002799

Dear Mr. Stewart:

During April and May 2013, I audited the Remedial Investigation (RI) Report and overall progress of the Wrightsville Ave site (Site) in the Registered Environmental Consultant (REC) Program. A REC Administrative Agreement (AA) was executed for the Site on December 10, 2008. As indicated in the AA and the REC Rules, the RI must be completed within three years of the effective date of the agreement. Therefore, the certified final RI report for the Site should have been submitted to the Branch by December 10, 2011. We did not receive the report until April 2, 2012.

We have not received any form of correspondence or reporting related to the Site during the past year except for one quarterly letter status report that was submitted late (on July 26, 2012). In response to the late quarterly report, I reminded you in an e-mail on July 30, 2012 that timely quarterly reports are a requirement of the AA. I have not since received a response or any further correspondence from you. Missing reporting deadlines is considered a violation of the AA and 15A NCAC 13C .0302(h).

I was recently informed by the NCDENR Wilmington Regional Office that a prospective developer may be pursuing a Brownfields Agreement (BFA) for the site. However, a BFA does not relieve an REC of the AA requirements and the need to complete the work performed to date.

Within 30 days, please provide a written update regarding the status of the project and explain why the RI Report was late and only one quarterly letter status report has been submitted to the Branch since October 2011. Your response must be certified in accordance with .0306(b). If you would like to meet with us to discuss the project and my audit findings, let me know.

REC Program staff routinely provide training and are available to answer questions and provide assistance with the Rules and Implementation Guidance to ensure that RSMs efficiently and effectively move their sites toward closure. If you have any questions please contact me at (919) 707-8349.

Sincerely,



Janet K. Macdonald, P.G.
REC Program
Inactive Hazardous Sites Branch, Superfund Section

cc: Mr. Stephen Pike, Investors Trust Mutual