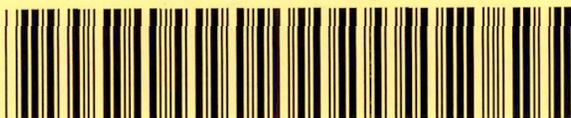


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DocumentID NONCD0002865

Site Name PIEDMONT TRIAD AIRPORT-AIR CARGO

DocumentType Correspondence (C)

RptSegment 1

DocDate 1/15/2009

DocRcvd 1/15/2009

Box SF1230

AccessLevel PUBLIC

Division WASTE MANAGEMENT

Section SUPERFUND

Program IHS (IHS)

DocCat FACILITY



North Carolina Department of Environment and Natural Resources

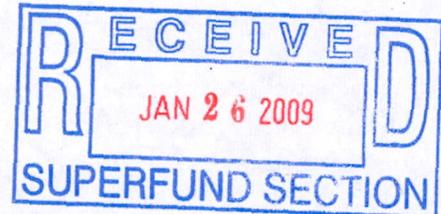
Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

January 15, 2009

Edward A. Johnson, Executive Director
Piedmont Triad Airport Authority
P.O. Box 35005
Greensboro, NC 27425



Re: **NOTICE OF REGULATORY REQUIREMENTS FOR CONTAMINANT ASSESSMENT AND CLEANUP**

Piedmont Triad Airport – Air Cargo
6415 Airport Parkway, Greensboro, Guilford County, NC
NONCD0002865
GW #6826

Dear Mr. Johnson:

It is our understanding that you have provided information about the above-referenced site and may have been performing assessment and cleanup activities under the supervision of the Division of Water Quality Aquifer Protection Section (“APS”). Regulatory oversight for the assessment and cleanup of this site has been transferred from APS to the Division of Waste Management. Future oversight at this site will be the responsibility of the Division of Waste Management’s Superfund Section, Inactive Hazardous Sites Branch (“Branch”).

Based on information provided to date, we understand that this site has been contaminated by one or more hazardous substances. The Inactive Hazardous Sites Response Act (“IHSRA”), codified under N.C. Gen. Stat. § 130A-310, *et seq.*, applies to the site. In addition, 15A NCAC 2L, Groundwater Classifications and Standards, applies to this site.

The change in oversight responsibility is designed to achieve consistency by addressing all contaminated media at the site with one approval process. The APS dealt with primarily enforcing 15A NCAC 2L, which requires that all contaminants in groundwater, or in soils to the extent that they could contaminate groundwater, be addressed. The cleanup requirements under IHSRA are broader. Under IHSRA all contaminated media must be addressed. In addition to requiring cleanup for the protection of groundwater and surface water, IHSRA requires that soils and sediment be remediated to meet direct contact levels protective of public health and ecological receptors. Consolidating all the contaminant remediation authorities will provide for one comprehensive cleanup, eliminating the need to work with multiple Divisions in resolving the various contaminated media at the site.

Additional information regarding the reorganization may be found on the Branch's web site located at <http://wastenotnc.org/sfhome/ihsbrnch.htm>.

I. ACTIONS REQUIRED AT THIS TIME:

Complete the Site Cleanup Questionnaire.

To comply with the requirements of State law, a Site Cleanup Questionnaire, available at the above website address, must be completed and returned to this office. The information you provide will be reviewed along with other information to prioritize the site, so please make certain that the information you provide is complete and accurate. Please note that your failure to inform the Branch of any nearby potable wells or other high risk conditions may adversely affect the Branch's ability to identify this site as a higher-risk site.

Take Initial Abatement Actions Required Under 15A NCAC 2L.

If you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of contamination. Beyond initial abatement actions, all assessment and remediation will be done through the IHSRA.

II. FUTURE ASSESSMENT AND CLEANUP ACTIVITIES:

All correspondence regarding this site should be sent to the Branch. Future assessment and cleanup activities (activities conducted after the initial abatement steps required in 15A NCAC 2L) may be conducted through the Voluntary Cleanup Program (discussed below) or pursuant to an Order issued under N.C. Gen. Stat. § 130A-310.3. In addition, if you choose not to conduct a cleanup through the Voluntary Cleanup Program, the site may be referred to the United States Environmental Protection Agency ("EPA"). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act ("CERCLA").

Please note, you are not expected to repeat work. However, if there are known or suspected areas of concern, contaminated media, or contaminants that were not investigated in the previous work, those items would need to be addressed. This would include any media, areas or contaminants to which there is evidence (such as, but not limited to, allegations or indications of spills, visual observations, field instrument readings, laboratory data, and chemical odors) of releases of contaminants or materials likely to contain contaminants. You and your consultant should evaluate whether there are additional items that are required to be addressed. PLEASE NOTE: If you have an approved corrective action plan, please complete the Site Cleanup Questionnaire, note that you have a corrective action plan prominently at the top of the Questionnaire, and staff will be in contact with you with further instructions.

III. VOLUNTARY CLEANUP PROGRAM:

Under the IHSRA, persons who move forward to assess and remediate contamination, without being compelled to do so through formal legal action filed against them, are called "volunteers." To participate in the voluntary cleanup program, you will be required to enter into an administrative agreement with the Branch. The voluntary cleanup will proceed through the Registered Environmental Consultant Program or under direct oversight by the Branch Staff, as discussed below:

Agreement to Conduct Assessment and Remediation Through the Registered Environmental Consultant Program.

The Branch has a privatized oversight arm of the voluntary cleanup program known as the Registered Environmental Consultant ("REC") program. Based on the responses provided on the questionnaire (degree of hazard and public interest in the site), the Branch will determine whether a staff person or an REC will perform the oversight and approval of your assessment and cleanup action. Please note that having one or more of the conditions identified on the questionnaire does not necessarily preclude the site for qualifying for an REC-directed cleanup action.

Under the REC program, the volunteer hires an environmental consulting firm, which the State has approved as having met certain qualifications, to implement a cleanup and certify that the work is being performed in compliance with regulations. In other words, the REC's certifications of compliance are in place of direct oversight by the Branch. Details of the REC program can be found at <http://www.wastenotnc.org/sfhome/recprog.htm>. If you have any questions specific to the REC Program, including how to participate, please contact the REC Program Manager, Kim Caulk, at (919) 508-8451.

Agreement to Conduct Assessment and Remediation Under State Oversight.

If the Branch determines that the site should be assessed and remediated pursuant to direct State oversight, it will not be eligible for a REC-directed cleanup. Rather, the remedial action will receive direct oversight by Branch staff.

IV. FAILURE TO RESPOND:

If we do not receive a completed questionnaire, the Branch will take further action to prioritize the site without your input. Failure to take the initial abatement steps required in 15A NCAC 2L may result in the assessment of a civil penalty against you. In addition, the Branch may seek an injunction compelling compliance with the initial abatement steps required in 15A NCAC 2L. For future work beyond the initial abatement steps required pursuant to 15A NCAC 2L, a unilateral Order may be issued pursuant to § 130A-310.3 to compel assessment and cleanup.

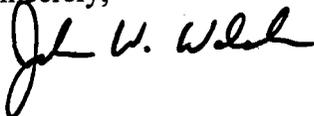
V. ADDITIONAL INFORMATION REGARDING THE IHSRA AND THE BRANCH:

People are often confused by the name of the Inactive Hazardous Sites Response Act and the Branch. By definition, "Inactive Hazardous Sites" are any areas where hazardous substances have come to be located and would include active and inactive facilities and a variety of property types. The term "inactive" simply refers to the fact that cleanup was inactive at large numbers of sites at the time of program enactment. Additional information about the Branch may be found at <http://www.wastenotnc.org/sfhome/ihsbrnch.htm>.

Submit completed questionnaire to: Mindy Lepard
Guilford County Dept. of Public Health
1203 Maple Street
Greensboro, NC 27405

If you have additional questions about the requirements that apply to your site, please contact Mindy Lepard at (336) 641-5557.

Sincerely,



John W. Walch, Eastern Unit Supervisor
Inactive Hazardous Sites Branch
Superfund Section

AdamsR@gsaair.org

John Nantz

From: John Walch [John.Walch@ncmail.net]
Sent: Friday, October 17, 2008 12:30 PM
To: John Nantz
Subject: Re: Piedmont/Triad Airport - Air Cargo (Incident # 6826)

John-

Is this site the same as US Airways Maintenance Hangar Site NONCD0002658? If this is not the same site, then the IMD #6826 site should be considered a new site. Please have someone submit a Data Entry Sheet so we can add it to the inventory. Please also prepare an NORR to the RP, if known, or the property owner if the RP is not known at this time.

Regarding the wells, since we are not working with them on the site, you can tell them that we can't prevent them from abandoning the wells in accordance with state law. However, they should probably be resampled before they are abandoned. Also, the RP will likely be required to install new wells in the future.

Finally you probably also want to tell them that since there is groundwater contamination in the area, they should consider worker exposure to contamination and vapor intrusion in any construction activities and building designs.

John

Piedmont Triad Airport Authority
 PO Box 35005
 Greensboro, NC 27425

John Nantz wrote:

John,

I received a phone call from Rick Adams with Piedmont Triad Airport Authority stating that they wanted to expand the Cessna Hangar but had located 2 monitoring wells adjacent to the current building and he wanted to know if they could abandon them. I did some research and found that these two wells are nested wells installed in 1991 (prior to our program) by Trigon Environmental in response to contamination found listed as incident # 6826 (Piedmont/Triad Airport – Air Cargo). Tetrachloroethene was discovered in MW-3 during the initial investigation in April, 1991, and the two wells in question (MW-6 and MW-7) were installed in October, 1991, to determine the downgradient extent of Tetrachloroethene contamination. Tetrachloroethene was discovered in both MW-6 (29 ppb) and MW-7 (57 ppb). A document in our file dated July 14, 1992, from Trigon Environmental recommends that PTIAA develop a remedial action plan, but there is nothing further in our files. Is it possible that you have a file for this incident? There is nothing on the IHSB database at the address listed for this incident (6415 Airport Parkway). How would you recommend that we proceed in response to the request to abandon these two wells?

John Nantz

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized county official. If you have received this communication in error, please do not distribute it. Please notify the sender by E-mail

10/22/2008

John Nantz

From: Robert Davies [Robert.Davies@ncmail.net]
Sent: Friday, October 10, 2008 3:56 PM
To: Mark Powers; Cindy Rintoul; Scott Bullock; Gene Jackson; Jan Andersen; Marti Morgan; Art Shacter; Jan Manthey; Ron Taraban; John Nantz; Karen Harmon; Linda L. Smith; Hougjen Sun; GROVER NICHOLSON
Subject: [Fwd: MEET ME NUMBER]

Here's the Meet Me Number for our conference call on Tuesday morning.

Bob

----- Original Message -----

Subject:MEET ME NUMBER
Date:Fri, 10 Oct 2008 15:44:23 -0400
From:Teixeira, Sonia <sonia.teixeira@its.nc.gov>
To:robert.davies@ncmail.net <robert.davies@ncmail.net>

MEET ME NUMBER CONFIRMATION

Below is your Meet Me Number information:

Name: ROBERT DAVIES
Dept. /Agency: DENR-WASTE MANAGEMENT
Date: 10/14/08
Start time: 9:30AM
End time: 11:30AM
Meet Me Number: 919-850-2822

Meet Me Number and Attendant Controlled Conference Call request can also be emailed as an attachment to ITS.Call.Reservation@its.nc.gov

THANK YOU AND ENJOY YOUR
WEEKEND!!!

Sonia Teixeira

NC State Government Switchboard Operator

sonia.teixeira@its.nc.gov

Work: 919-733-1110

Fax: 919-733-5279

"Patience is the companion of wisdom."

10/10/2008

MW - CESSNA

oct

1991

MW-7

29'

MW-6

93'

Rich Adams
665-5642
please give him
a call about
PT/A

Piedmont Triad Airport

6415 Airport Parkway

Incident # 6826

04/01/91: monitoring well permit

05/07/91: Subsurface Environmental Investigation Report

- expanding air cargo handling area
- odor of petroleum detected
- some locations had been used as burn pits during fire-fighting training exercises
- aviation maintenance done on-site

Soil:	<u>TPH-DRO</u>	<u>TPH-GRO</u>
BP-1	14,302	971
BP-2	2,044	221

	<u>benzene</u>	<u>toluene</u>	<u>chromium</u>	<u>copper</u>	<u>lead</u>	<u>nickel</u>	<u>zinc</u>
HA-1, HA-2	0.239	0.246	4.3	22.6	13.3	3.95	27.5

	<u>benzene</u>	<u>toluene</u>	<u>PCE</u>	<u>1,4-dichlorobenzene</u>	<u>chloroform</u>
mw-3	356	988	363	576	38
mw-4	233	289	BQL	BQL	43

03/01/91: Environmental Assessment

- soil sample from wetland did not contain conc. of metals above regulatory levels
- surface water in wetland (near mw-4) revealed hydrocarbons in range similar to varsol. could be originating from groundwater discharging into the wetland.
- contamination in mw-3 could be from septic tank that was removed from that area.
- removed soil

08/14/91: PIRF

08/14/91: NOV for initial abatement and assessment

08/29/91: response to NOV. explain what they have done at site.

- removed 1835 yd.³ of contaminated soil

08/30/91: letter from PTIA explaining what they are doing to comply

10/31/91: letter from PTIA and Trigon regarding landfarming

11/12/91: Landfarming permit from DENR

01/08/92: Groundwater Investigation Report

- installed mw-6 → mw-10. installed near location of mw-3 and mw-4 which were abandoned.
- calculated migration rate ~ 50 ft./ year

- mw-6 and mw-7 are 140 ft. downgradient of former mw-3
 - no contaminants found in mw-6 and mw-7
 - mw-6 and mw-7 are nested wells
- mw-9 is 50 ft. downgradient of former mw-4
 - no contaminants in mw-9
- mw-8 and mw-10 provide lateral brackets
 - no contaminants in mw-8 and mw-10
- hydrocarbons previously found have not migrated downgradient

07/14/92: Groundwater Monitoring well Sampling

	<u>PCE</u>
mw-6	29 ppb
mw-7	57 ppb
mw-9	3 ppb