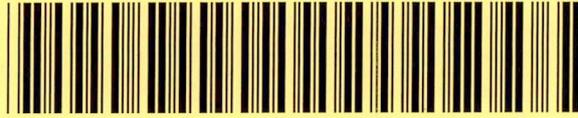


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April 27, 2011

Ms. Mindy Lepard
Environmental Health Section
Guilford County Department of Public Health
400 West Market Street
Greensboro, NC 27401

Re: United Metal Finishing, Inc.
133 Blue Bell Road
Greensboro, North Carolina
NONCD 0002871



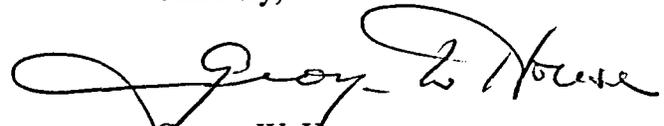
Dear Ms. Lepard:

As we discussed this morning, the above-referenced site is under contract to be purchased by Heron Bay Acquisition, LLC ("Heron Bay"), and Heron Bay has obtained a determination of eligibility to participate in the North Carolina Brownfields Program. As part of the requirements of that Program, Heron Bay has submitted a proposed work plan for site assessment prepared by ECS Carolinas, LLP. A copy of that work plan is attached. Heron Bay and ECS are now awaiting approval upon the Brownfields section to implement that work plan.

Due to these circumstances, United Metal Finishing, Inc. of Greensboro ("United Metal") does not believe that it is either advisable or necessary to enter into an Administrative Agreement for a State-Directed Assessment for Remedial Action ("AA"). Upon completion of the work required by the work plan, United Metal will provide your office with a copy of that investigative work.

Please call me if you have any questions.

Sincerely,



George W. House

GWH/bbh



WORK PLAN

**UNITED METAL FINISHING
GREENSBORO, NORTH CAROLINA**

Prepared for:

**UNITED METAL FINISHING, INC.
GREENSBORO, NORTH CAROLINA**

Prepared by:

**ECS CAROLINAS, LLP
GREENSBORO, NORTH CAROLINA**

APRIL 11, 2011



ECS CAROLINAS, LLP

"Setting the Standard for Service"

Geotechnical • Construction Materials • Environmental • Facilities NC Registered Engineering Firm F-1078

April 11, 2011

Mr. Claude Church
United Metal Finishing, Inc.
133 Blue Bell Road
Greensboro, North Carolina 27406

Reference: Work Plan
United Metal Finishing, Inc.
133 Blue Bell Road
Greensboro, Guilford County, North Carolina
ECS Project 09.11981E
Brownfields Project Number – 15002-11-41

Dear Mr. Church:

As authorized by your acceptance of our Proposal 09.17497-P, dated March 31, 2011, ECS Carolinas, LLP (ECS) is pleased to submit this Work Plan to investigate the extent of impact to the site from metal plating and finishing operations at the facility located at 133 Blue Bell Road in Greensboro, North Carolina.

This Work Plan is intended only for the use of United Metal Finishing, Inc. and for submission to the North Carolina Department of Environment and Natural Resources (NCDENR), Inactive Hazardous Sites Branch (IHSB) and the North Carolina Brownfields Program. The contents should not be relied upon by any other parties without the express written consent of ECS. Our evaluation of site conditions and the formulation of this Work Plan have been based on our understanding of the site and project information and previous assessments performed at the site. On March 9, 2011 the NCDENR issued a notice stating the project was eligible for entry into the North Carolina Brownfields Program for continued evaluation for a Brownfields Agreement on a conditional basis. According to the notice, additional assessment is necessary to determine the horizontal extent of soil and groundwater impact at the site in order to evaluate potential future impact at the site from proposed building expansion and expanded operations. The primary objective was to prepare a Work Plan to satisfy the requirements of the NCDENR IHSB and NC Brownfields Program. Due to the nature of subsurface assessments, conditions may vary from those anticipated in the preparation of this plan, or the extent of impacted soil or groundwater may be greater than expected and additional assessment may be required. The Work Plan will be used as a basis for the completion of the Contaminant Assessment in accordance with the current North Carolina regulations.

United Metal Finishing, Inc.
Greensboro, Guilford County, North Carolina
ECS Project 09.11981E
April 11, 2011

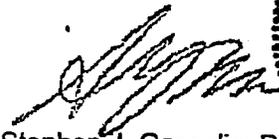
We appreciate this opportunity to provide our environmental related services on this project. Please contact us if we may be of further service.

Sincerely,

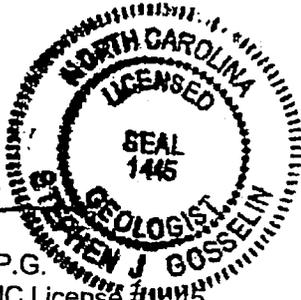
ECS CAROLINAS, LLP



Toby S. Benfield
Project Scientist



Stephen J. Gosselin, P.G.
Principal Geologist - NC License #1445



cc: Mr. Claude Church – United Metal Finishing, Inc.
Ms. Sharon Eckard – NCDENR - North Carolina Brownfields Program

TABLE OF CONTENTS

1.0 SITE DESCRIPTION	1
2.0 SITE HISTORY.....	3
3.0 PROPOSED REMEDIAL INVESTIGATION	4
4.0 QUALITY ASSURANCE/QUALITY CONTROL.....	7
5.0 FIELD PROCEDURES	8
5.1 Soil Sample Logging.....	8
5.2 Closure of Sample Point Locations	9
5.3 Groundwater Monitoring Well Sampling.....	9
5.4 Decontamination.....	9
5.5 Field Screening.....	10
6.0 HEALTH AND SAFETY	10

FIGURES

- Figure 1 – Site Location Map
- Figure 2 – Site Map
- Figure 3 – Proposed Soil and Groundwater Sample Location Map
- Figure 4 – Potentiometric Map (from previous assessment)

APPENDIX

- Preliminary Drawing of Proposed Development
- Notice of Regulatory Requirements and Correspondence

1.0 SITE DESCRIPTION

The site is located at 133 Bluebell Road in Greensboro, North Carolina. The site contains an office/warehouse building, several processing buildings and several storage buildings. ECS previously prepared a Phase I ESA (ECS Report No. 09.11981 dated January 20, 2006). According to the Phase I ESA, the site has been occupied by a steel manufacturing company, an ammunitions manufacturer and a plating facility, which have potentially utilized chlorinated solvents. An on-site reconnaissance of the facility revealed that the concrete floors in the processing buildings are severely stained and covered with pools of liquid mixtures containing various substances including, but not limited to, nickel, methyl ethyl ketones, sulfuric acid and alodine at the time of the study. Based on the porous nature of aggregate materials composing typical concrete mixtures, it is possible for the spilled liquids to migrate into the surrounding soils and groundwater. According to Greensboro Fire Department Records, a UST was formerly removed or abandoned at the site.

Based on the findings of the Phase I ESA, ECS performed a Phase II Environmental Site Assessment (ECS Report No. 09.11981A dated March 5, 2007) for the site. Soil borings were drilled inside and north of the processing/plating building as well as surrounding the hazardous material storage and containment area. Temporary groundwater monitoring wells were installed north of the processing/plating building, south of the anodizing/electrolysis building and along the eastern property boundary. Elevated levels of chromium were identified in the soils beneath the floor slab in the vicinity of the electroplating baths and to the north of the plating building and in groundwater just north of the processing building.

Based on the findings of the Phase II ESA, an application for admission into the North Carolina Brownfields Program was submitted on January 24, 2011. On March 9, 2011 the North Carolina Department of Environment and Natural Resources (NCDENR) issued a notice stating the project was eligible for entry into the North Carolina Brownfields Program for continued evaluation for a Brownfields Agreement on a conditional basis. According to the notice, additional assessment is necessary to determine the horizontal extent of soil and groundwater impact at the site in order to evaluate potential future impact at the site from proposed building expansion and expanded operations.

ECS was requested to prepare a Work Plan to satisfy the requirements of the NCDENR IHSB and the NC Brownfields Program by Mr. Claude Church with United Metal Finishing, Inc. The Work Plan will be used as a basis for the completion of the Brownfields Assessment in accordance with the current North Carolina regulations. Project information is based on conversations between Mr. George House with Brooks, Pierce, McLendon, Humphrey and Leonard (the attorney for Mr. Claude Church), Ms. Sharon Eckard with the NC Brownfields Program and Mr. Toby S. Benfield with ECS and the previously cited reports.

1.1 Site Geology and Hydrogeology

As determined from the USGS Topographic Map, Greensboro, North Carolina Quadrangle (Figure 1), a tributary to South Buffalo Creek is located approximately 600 feet northwest of the site. Elevations on the site range from approximately 770 feet above mean sea level near the southern boundary to approximately 760 feet above mean sea level near the northern boundary of the site. Surface runoff is generally to the north-northwest toward the tributary to South Buffalo Creek. Contiguous properties to the south appear to be upgradient of the site based on the groundwater flow direction inferred from the surface topography.

The subject property is located within the Carolina Slate Belt of the Piedmont Physiographic Province. The soils encountered in this area are the residual product of in-place chemical weathering of rock presently underlying the site. In general, shallow unconfined groundwater movement within the overlying soils is controlled largely by topographic gradients. However, as the groundwater percolates downward to the bedrock, it becomes controlled by the orientation of the rock fracture systems. Thus, the direction of groundwater movement may not be consistent with the reflecting topography. Recharge occurs primarily by infiltration along higher elevations and typically discharges into streams or other surface water bodies. The elevation of the shallow water table is transient and can vary with seasonal fluctuations in precipitation. Movement in this water table is generally from higher to lower elevations. As such, shallow groundwater would be expected to flow generally to the north-northwest beneath the site

1.2 Water Supply Wells, Springs and Surface Water Intakes

ECS conducted a vehicle reconnaissance of the site and the surrounding area within one-half mile of the site. No water supply wells were observed. ECS has contacted the Guilford County Department of Public Health. An unnamed tributary to South Buffalo Creek is located approximately 600 feet northwest of the site. Springs were not identified within one-half mile of the site during our vehicle reconnaissance. There are no surface water intakes located within one mile of the site.

1.3 Evaluation of Environmentally Sensitive Areas

As required by the NCDENR Groundwater Section Guidelines Dated July 2000, the following federal and state agencies will be contacted to request information regarding environmentally sensitive areas located on the site or in the vicinity of the surrounding properties. Letters will be sent via certified mail to each agency requesting them to search its element record database and respond to ECS with the findings. A letter will not be sent to the North Carolina Division of Coastal Management (DCM) because the site is not located in one of the twenty coastal counties of North Carolina that fall under the regulatory authority of the DCM. A letter will not be sent to the National Oceanic and Atmospheric Administration since the site does not encompass marine sanctuaries. The agencies to be contacted are listed below:

North Carolina Division of Parks and Recreation, Natural Heritage Program
North Carolina Planning and Natural Resources

*Work Plan
United Metal Finishing
Greensboro, Guilford County, North Carolina
ECS Project 09.11981E
April 11, 2011*

National Parks Service
US Forest Service
North Carolina Division of Water Quality
North Carolina Division of Forest Resources
US Fish and Wildlife Service
North Carolina Department of Cultural Resources
North Carolina Wildlife Resources Commission
US Army Corps of Engineers

1.4 Evaluation of Natural Areas, Stressed Vegetation or Wildlife

ECS conducted a reconnaissance of the site. The site is comprised of two manufacturing buildings, three storage buildings and gravel covered parking areas and driveways. Stressed vegetation was not observed at the site. The site contains common species of wildlife. No federally or state-listed (protected) wildlife, vegetation or critical habitats were observed.

2.0 SITE HISTORY

2.1 Site Ownership

According to the deeds obtained from the Guilford County Register of Deeds, the site consists of two parcels which are owned by Mr. Claude T. Church and Ms. Catherine Ann Church. Mr. and Ms. Church have owned the site for approximately 25 years.

2.2 Operational History

The site has previously been occupied by Textile Loom Reed Company, Inc from at least 1965 until at least 1970 and Steel Heddle Manufacturing Company from at least 1975 until at least 2000. The portion of the site addressed as 133 Blue Bell Road was previously occupied by Sands Vending Service and American Pistol Bullet prior to 1985. Limited information is available pertaining to past operations at the site. The site is currently occupied by United Metal Finishing, Inc.

2.3 Previous Investigations

Based on the findings of the Phase I ESA, ECS performed a Phase II Environmental Site Assessment (ECS Report No. 09.11981A dated March 5, 2007) for the site. Soil borings were drilled inside and north of the processing/plating building as well as surrounding the hazardous material storage and containment area. Temporary groundwater monitoring wells were installed north of the processing/plating building, south of the anodizing/electrolysis building and along the eastern property boundary. Elevated levels of chromium were identified in the soils beneath the floor slab in the vicinity of the electroplating baths and to the north of the plating building and in groundwater just north of the processing building.

Based on the findings of the Phase II ESA, an application for admission into the North Carolina Brownfields Program was submitted on January 24, 2011. On March 9, 2011 the North Carolina

Department of Environment and Natural Resources (NCDENR) issued a notice stating the project was eligible for entry into the North Carolina Brownfields Program for continued evaluation for a Brownfields Agreement on a conditional basis. According to the notice, additional assessment is necessary to determine the horizontal extent of soil and groundwater impact at the site in order to evaluate potential future impact at the site from proposed building expansion and expanded operations.

3.0 PROPOSED REMEDIAL INVESTIGATION

3.1 Soil and Groundwater Assessment Activities

- ECS will prepare a health and safety plan for the proposed activities.
- ECS will contact a public utility locating company (NC One Call) and the City of Greensboro to identify public underground utilities at the site.
- ECS will contract with a private utility locator to identify private subsurface utilities.
- ECS will contract with a State of North Carolina Certified Well Contractor to provide drilling services at the site.
- ECS will provide environmental personnel to observe and document drilling activities, screen soil samples for relative levels of volatile organic vapors (VOCs) using a flame ionization detector (FID) and to collect soil and groundwater samples for laboratory analysis.
- Duplicate samples will be collected at a frequency of one per media per analysis per day. An equipment rinseate will be collected at the rate of one per piece of equipment per day. A trip blank will be sent in the cooler with the sample bottles to be analyzed for pesticides.

3.1.1 Soil Assessment

- The drilling contractor will advance 24 soil borings based on a systematic grid pattern across the site and 8 additional soil borings surrounding the plating area inside the building using a Geoprobe[®] drill rig (33 total). In addition, one soil boring will be drilled in an undeveloped portion of the site to determine background levels for comparative purposes. Soil samples will be obtained generally from within the top half and bottom half of each soil boring (68 samples total). The borings will be drilled to approximate depths of 10 feet below ground surface (bgs) to delineate the horizontal and vertical extent of impact at the site.
- ECS will provide environmental personnel to observe and document drilling activities, screen soil samples for relative levels of volatile organic vapors (VOCs) using a flame ionization detector (FID) and to collect soil and groundwater samples for laboratory analysis.
- Soil samples will be collected from the approximate top half and from the approximate bottom half from each boring and will be submitted to a North Carolina certified laboratory to be analyzed for chromium (Cr), arsenic using EPA Method 200.7 and hexavalent chromium (Cr +6).

- Duplicate samples will be collected at a frequency of one per media per analysis per day.
- The soil generated from the borings will be placed into NCDOT-approved 55-gallon drums for disposal. The borings will be filled with bentonite hole plug and the ground surface repaired with asphalt or concrete, if necessary.

3.1.2 Groundwater Assessment

The site hydrogeology will be assessed with six Type II groundwater monitoring wells upgradient and downgradient of the plating operations and within the areas of proposed redevelopment. The purpose of the groundwater monitoring wells will be to monitor static groundwater elevations for assessing groundwater flow directions and to provide long-term monitoring of potential groundwater impact.

- ECS will procure monitoring well construction permits for the construction of the monitoring wells.
- ECS will drill and install six permanent groundwater monitoring wells using the Geoprobe® equipped with 3-inch diameter rods (using rotary drilling if necessary) to an approximate depth of ten feet beneath the water table (estimate 20 feet based on previous assessment at the site). Soil samples will be obtained generally at five-foot intervals starting at the surface or in the first encountered soils. The soil samples will be obtained with a standard 1.4 inch I.D., 2.0-inch O.D., split spoon or macro core sampler. Soil samples will be screened in the field using a toxic vapor analyzer (TVA). No soil samples will be collected for laboratory analysis. Two Type II groundwater monitoring wells will be located downgradient of the plating operations, three Type II groundwater monitoring wells will be located in the areas of proposed redevelopment and one Type II groundwater monitoring well will be located upgradient of the plating operations.
- Drill cuttings will be stored in a centralized location on site in 55-gallon drums and disposed of at an approved facility.
- ECS will install a Type II monitoring well constructed of 2-inch diameter Schedule 40 PVC casing in each boring. The wells will be installed with 10 feet of machine slotted PVC screen (0.01 inch slot widths) positioned to intersect the water table at the time of drilling. A protective steel cover will be installed over each well with an approximate 1-foot by 1-foot concrete pad.
- Approximately 24 hours after the installation all the wells, ECS will purge and sample the permanent wells. Each well will be purged and sampled using low flow techniques. Geochemical parameters (pH, dissolved oxygen [DO], oxygen reduction potential [ORP] conductivity and turbidity) will be collected. The groundwater samples will be appropriately packaged and submitted to a North Carolina certified laboratory to be analyzed for 13 priority pollutant metals plus iron (Fe), manganese (Mn) and sulfate (SO₄), hexavalent chromium (Cr⁺⁶) and total organic carbon (TOC). Duplicate samples will be collected to be held and then filtered by the laboratory (if non-filtered results are above standards) and sampled for 13 priority pollutant metals. The hold time for total and dissolved RCRA metals

is 6 months. **The hold time for Cr+6 is 24-hours; therefore, no duplicates samples for Cr+6 will be collected.**

- Groundwater generated during the construction of the groundwater monitoring wells will be placed in NCDOT 55-gallon steel drums for disposal. The drums will be temporarily stored in a centralized location and disposed of at an approved facility.
- The top of well casing (TOC) elevation of the newly installed monitoring wells will be surveyed by a North Carolina licensed surveyor. The wells will be located relative to site landmarks and the surveyor will measure the horizontal distance between the newly installed wells.
- We will measure the depth to groundwater in each monitoring well at the site. From these measurements, we will estimate the direction of groundwater flow and the horizontal hydraulic gradient.

3.2 Site Survey

- ECS will contract with a licensed surveyor to prepare a base survey map/Brownfields survey Plat of the site. The survey will include field verification of existing visible physical features including buildings, fences, wood lines, paving, utility poles, boxes, markings, etc. Utility information will be noted from visible above ground utility covers, etc. Horizontal and vertical datums will be field-based per local control. Topographic contours will be provided on 5 foot intervals per the Guilford County GIS. The survey will not be an ALTA/ASCM survey or complete boundary survey.
- The survey will include the following: horizontal location and the relative elevation of the top of the monitoring well casings, the establishment and location of a bench mark relative to local control and vertically tied to each monitoring well and the location of each property boundary provided that the property corners are properly monumented (if not, the available corners will be located and the deed line oriented to the same).

3.3 Investigative Derived Waste (IDW) Disposal Services

- ECS will contract with a waste disposal contractor qualified to dispose of the investigative derived waste generated during soil and groundwater investigation.
- Soil cuttings, decon water and groundwater generated during the soil borings and construction of the groundwater monitoring wells will be placed in NCDOT 55-gallon steel drums for disposal. The drums will be left in a centralized location on-site for disposal. One soil or water sample will be collected per every five drums and composited for disposal purposes. The disposal samples (estimate 3 samples) will be analyzed using full Toxic Characteristic Leachate Procedures (TCLP). A qualified contractor will dispose of the drums at an approved disposal facility.

3.4 Reporting Services

- Upon completion of the assessment activities, ECS will prepare a Contaminant Assessment Report for submittal to the NC Brownfields Program and the IHSB. The report will be prepared by or under the direction of a North Carolina Licensed Professional Engineer or North Carolina Licensed Geologist. The Contaminant Assessment Report will include, but not necessarily be limited to, the following items:
 - Facility and site descriptions.
 - Site history and source characterization.
 - Receptor Information
 - Description of soil and groundwater sampling procedures.
 - Description of geology, soils and groundwater encountered at the site.
 - Geologic cross-sections.
 - Groundwater potentiometric maps.
 - Field screening and laboratory results presented in tabular form.
 - Hydrogeologic Investigation
 - Site survey plan sheets.
 - Site location, site plan and concentration isopleth figures.
 - Appendices for boring logs, field data, well development data, and laboratory data sheets.
 - Evaluating conclusions and recommendations.

4.0 QUALITY ASSURANCE/QUALITY CONTROL

Field screening equipment, TVAs, pH meters, conductivity meters, etc. will be checked to be in proper working order and will be calibrated in accordance with the manufacturer's recommendations prior to use at the site and daily thereafter.

Samples for laboratory analysis will be properly labeled and proper chain-of custody and analysis request forms will be completed.

A minimum of one duplicate sample per medium per container type per field day will be utilized. Equipment rinseate blanks and trip blanks will be utilized.

Waste samples for volatiles analysis will be collected directly into sample containers without mixing.

5.0 FIELD PROCEDURES

5.1 Soil Sample Logging

Soil sample logs for soil borings will be prepared in the field by an ECS professional. Soil and lithological logs will include the following:

- Log entries will be printed. The log scale will be dependent upon the anticipated total depth. The typical scale is 1 inch = 5 feet.
- Relevant location information will be noted. If surveyed horizontal control is not available at the time of drilling, location sketches referenced by measured distances to prominent surface features will be made.
- Depth information will be to the nearest 0.1 foot. Logs will indicate the interval and total depth of penetration and sampling. Soil sample types will be indicated (push or split-spoon samples). "Blow counts" will be recorded for each six-inch interval that split spoon samples are driven for soil borings. The bottom of the hole will be identified with the notation "Boring Terminated" or "Sampling Terminated".
- Soil materials will be visually classified by the Unified Soil Classification System (USCS). Soils will be described as follows:
 - origin of soil (alluvium, residuum, etc.);
 - consistency of cohesive materials or relative density of non-cohesive materials (based on the relative effort for hydraulically pushing the sample or using general correlations with the standard penetration resistance);
 - color;
 - soil modifiers;
 - predominant soil;
 - comments (roots, organic material, moist, wet, etc.)
- Field logs will identify the depth at which water is first encountered, the depth to water at the completion of sampling and the stabilized depth to water. The absence of water will also be indicated.
- Special drilling or sampling problems will be recorded on field logs, including descriptions of problem resolutions.
- Logs will include other information relevant to this assessment, including but not limited to odors, FID/PID measurements or other field screening or test results, and observed evidence of contamination in samples, cuttings or drilling fluids.

5.2 Closure of Sample Point Locations

Holes produced at intrusive sample point locations, such as soil borings not converted to wells, will be closed by filling holes with a bentonite grout mixture. Grouting will proceed from the bottom of the hole upward until grout is observed at the surface. Additional grout will be placed as needed to compensate for settlement of the grout upon hardening.

5.3 Groundwater Monitoring Well Sampling

The procedure for sampling groundwater monitoring wells is as follows:

- Depth to groundwater and depth to bottom of casing measurements from the top of the PVC casing will be obtained to the nearest 0.01 foot using an electronic water level meter. The water level meter will be decontaminated between monitoring wells using a phosphate-free detergent and distilled water rinse.
- Monitoring wells will be purged using new disposable polypropylene bailers, peristaltic pump and new length of polypropylene tubing or a decontaminated stainless steel pump. Measurements of pH, specific conductance and temperature will be monitored until readings generally stabilize. Approximately three well volumes will be purged using low flow techniques or if the wells are slow to recharge, they will be purged dry twice. The purge water will be drummed, labeled and left on-site for future disposal.
- The static water levels will be allowed to recover prior to sampling. The groundwater samples will be collected with new disposable polypropylene bailers or a peristaltic pump and new length of tubing, and will be placed in properly labeled laboratory prepared containers. Bailers and containers will be handled with new nitrile gloves.
- The groundwater samples will be placed in and transported in sealed coolers on ice to a North Carolina certified laboratory for analysis. Samples will be shipped with proper chain of custody forms, analyses request forms and sample seals.

5.4 Decontamination

- To minimize the potential for cross contamination, sampling equipment will need to be decontaminated. Prior to drilling soil borings for monitoring, the downhole equipment, including augers and drill rods, will be steam cleaned and decontaminated. Soil and water sampling equipment (split spoon or macro core samplers) will be either steam cleaned or decontaminated between borings/samples using the following procedures:
 - washed with municipal water and non-phosphate detergent solution
 - rinsed with distilled water
 - rinsed with pesticide-grade isopropanol
 - rinsed with distilled water

- Soil sampling equipment that is decontaminated at a location other than the sampling location will be wrapped in aluminum foil (shiny side out) prior to transportation to the sampling location to reduce contamination potential. Where feasible, new, disposable sampling equipment will be utilized. Decontamination fluids will be placed with drill cuttings into 55-gallon drums for future disposal.

5.5 Field Screening

- Soil samples will be placed in resealable bags for screening using a Foxboro Model 1000B toxic vapor analyzer (TVA). It is important the equipment type and procedures used are consistent since the indications of impact from one sample to another are relative. The bags will be partially filled with soil material and placed in a warm location. After approximately ten minutes, the probe of the TVA will be inserted into the headspace of the bag and the organic vapors will be recorded. The TVA is useful only as a qualitative indicator of volatile organic compounds (VOCs) and should not be relied upon to quantify VOC concentrations in soil samples. The TVA screening results and the corresponding sample depths will be summarized on the boring logs.

6.0 HEALTH AND SAFETY

A site specific health and safety plan (HASP) will be prepared in accordance with EPA protocols and provisions of OSHA (29 CFR 1910 and 1926). The site HASP will address the following:

- work practices
- hazard identification and assessment
- establishment of work zones
- level of personal protective equipment required in each work zone
- entry and exit routes
- decontamination procedures
- accident/emergency response
- heat stress/cold exposure
- health and safety of nearby residences and businesses

FIGURES

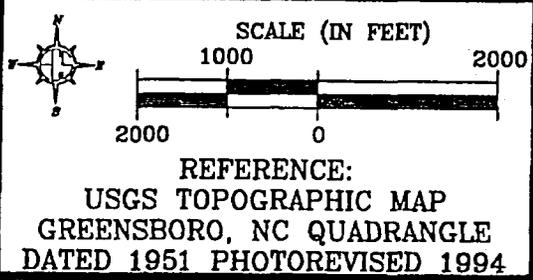
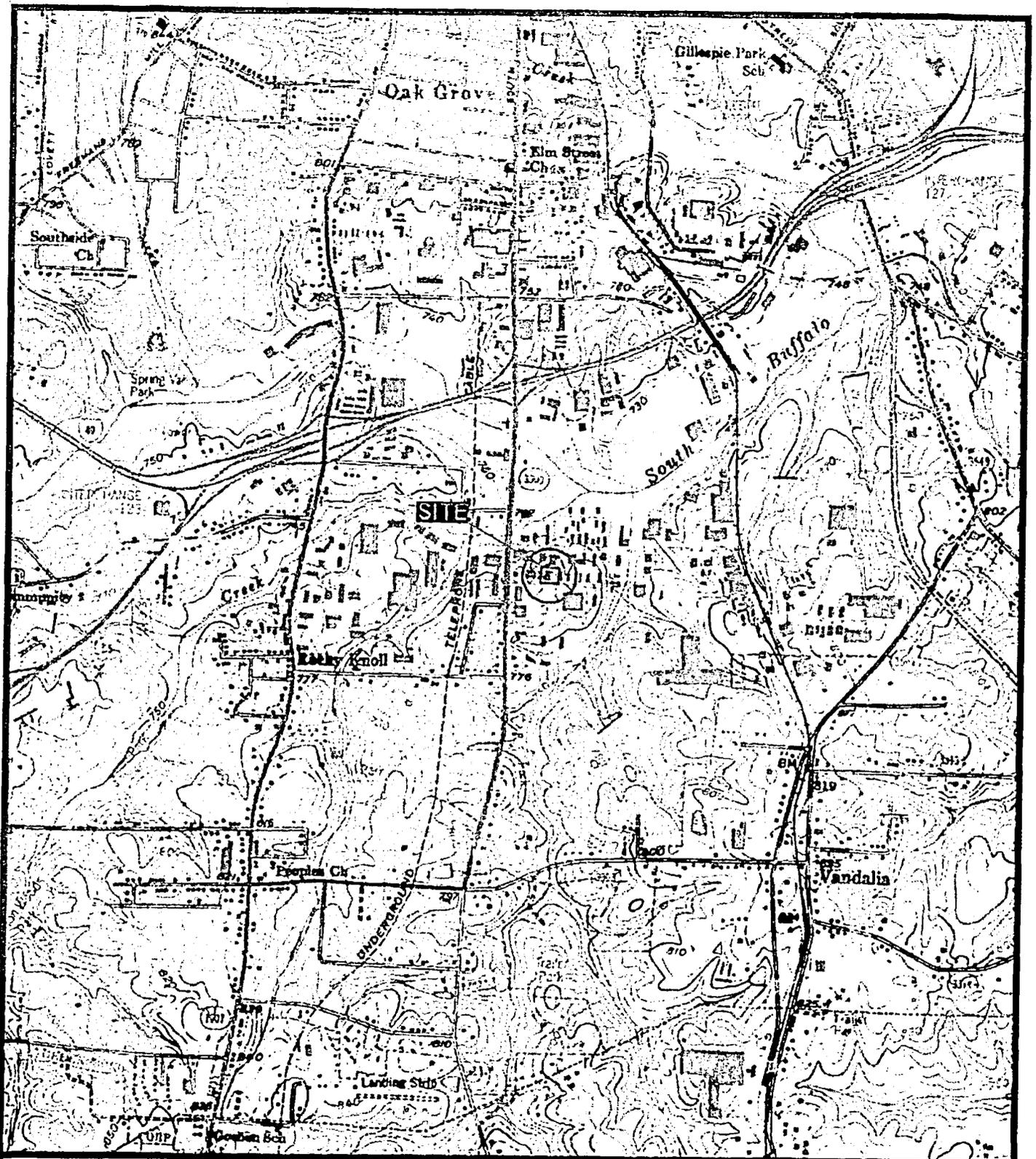
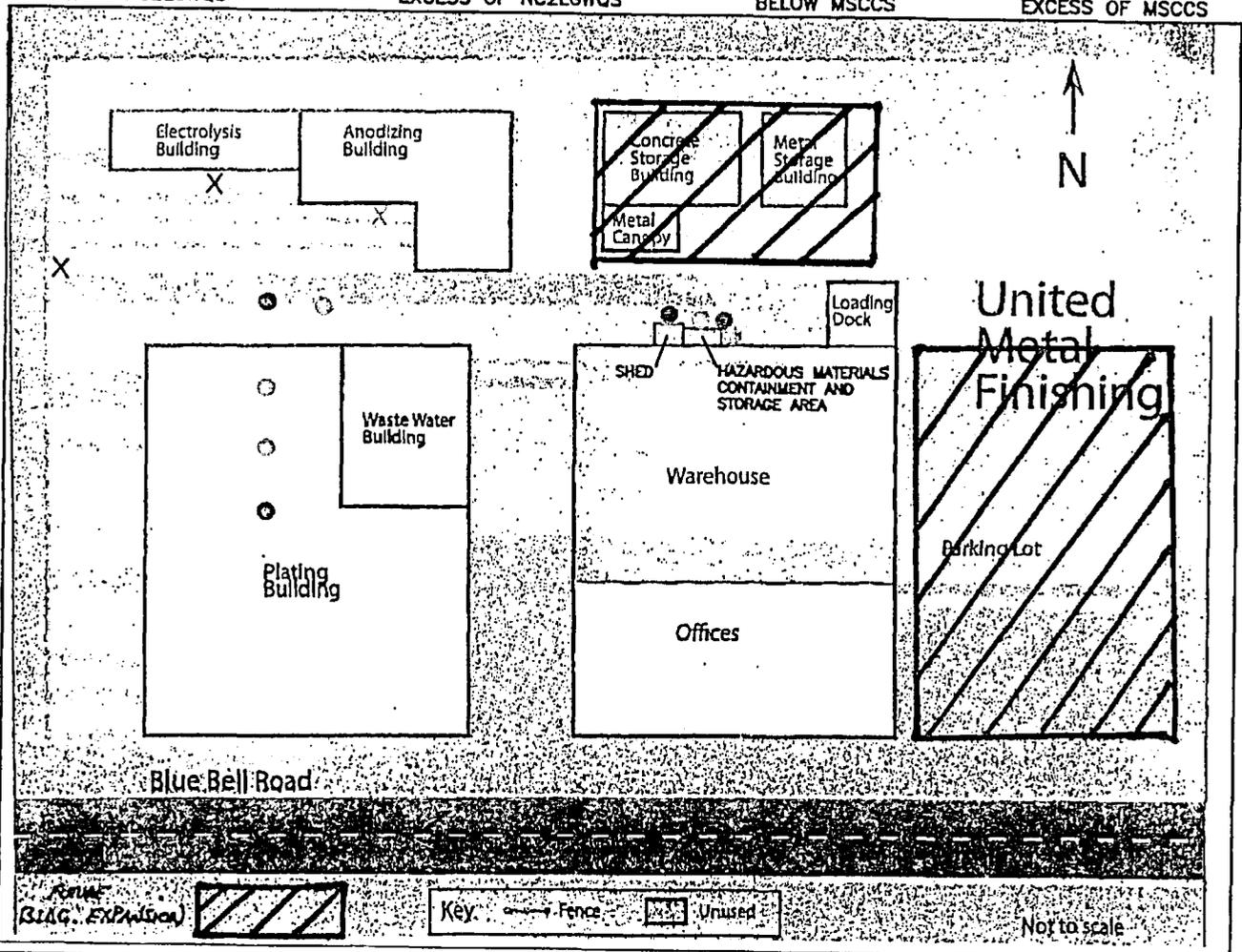


FIGURE 1

SITE LOCATION MAP
 UNITED METAL FINISHING, INC.
 133 BLUE BELL ROAD
 GREENSBORO, NORTH CAROLINA

ECS PROJECT 09.11981E

X = GROUNDWATER LESS THAN NC2LGWQS X = GROUNDWATER IN EXCESS OF NC2LGWQS ⊙ = SOIL SAMPLE BELOW MSCCS ⊙ = SOIL SAMPLE IN EXCESS OF MSCCS



NOT TO SCALE

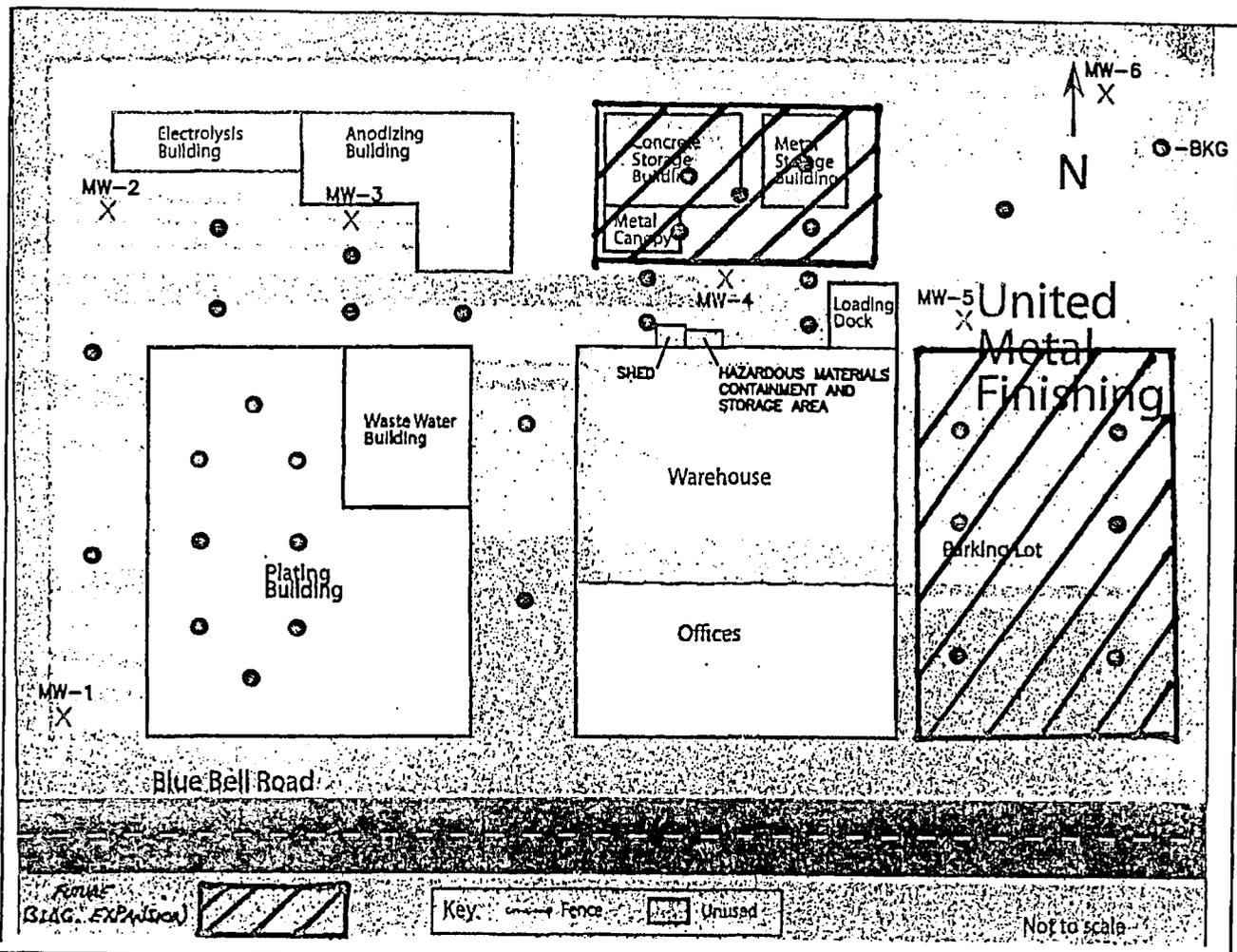


FIGURE 2
PREVIOUS SOIL AND GROUNDWATER
SAMPLE LOCATION MAP
UNITED METAL FINISHING, INC.
133 BLUE BELL ROAD
GREENSBORO, NORTH CAROLINA

DRAWN BY/DATE
JMR/04-08-11

CHECKED BY/DATE

PROJECT NO.
09.11981E



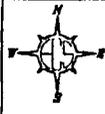

 NOT TO SCALE



FIGURE 3
 PROPOSED SOIL SAMPLE AND
 GROUNDWATER SAMPLE LOCATION MAP
 UNITED METAL FINISHING, INC.
 133 BLUE BELL ROAD
 GREENSBORO, NORTH CAROLINA

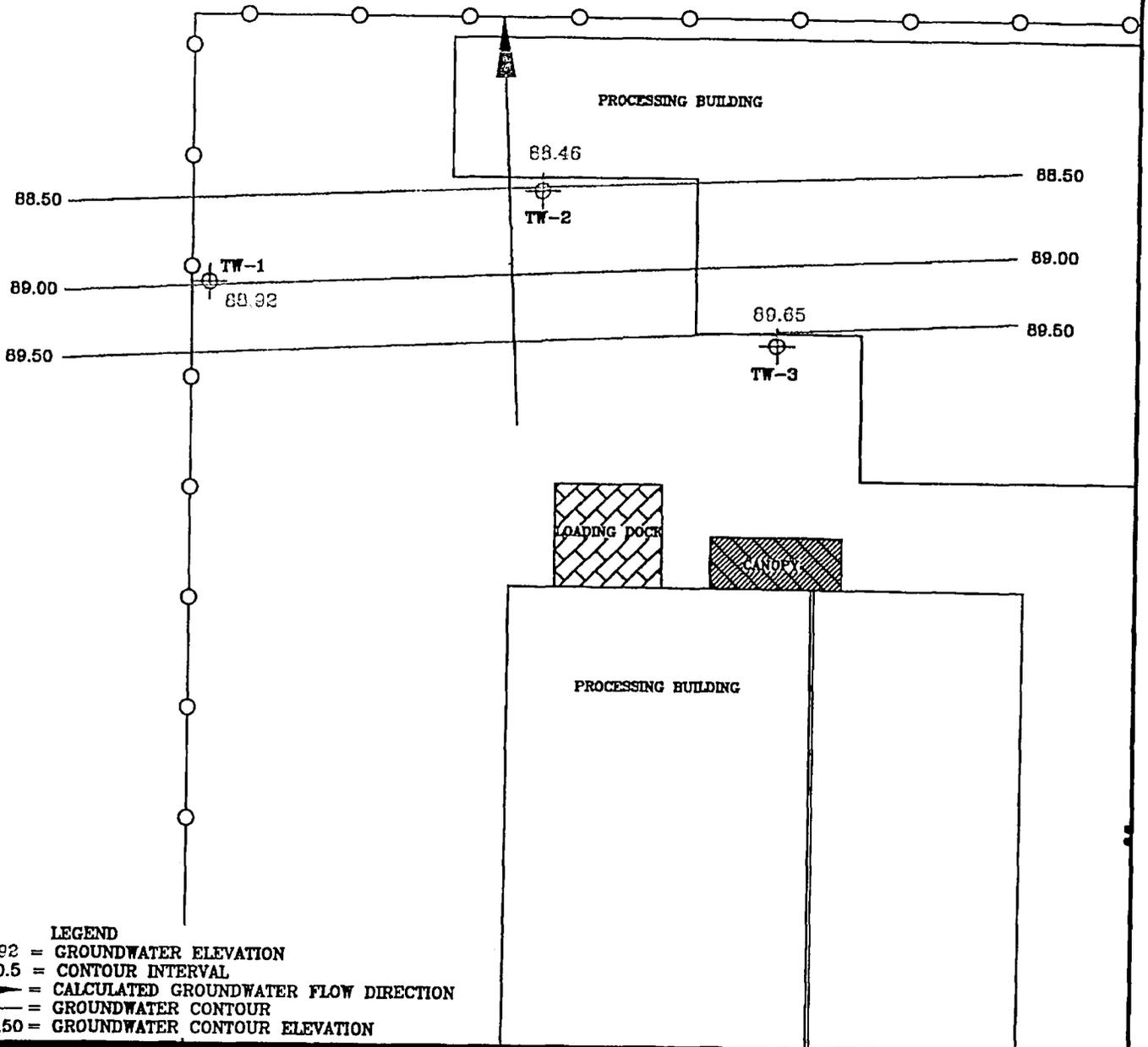
DRAWN BY/DATE:
 JMR/04-08-11

CHECKED BY/DATE:

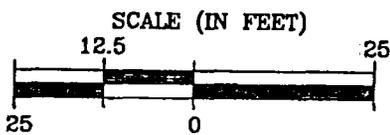
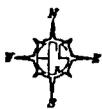
PROJECT NO.
 08.11981E

APPENDIX

INFORMATION COLLECTED
DURING PREVIOUS
ASSESSMENT



LEGEND
 88.92 = GROUNDWATER ELEVATION
 0.5 = CONTOUR INTERVAL
 = CALCULATED GROUNDWATER FLOW DIRECTION
 = GROUNDWATER CONTOUR
 89.50 = GROUNDWATER CONTOUR ELEVATION



REFERENCE:
FIELD NOTES BY ECS PERSONNEL



FIGURE 4

POTENTIOMETRIC SURFACE MAP
UNITED METAL FINISHING, INC.
133 BLUE BELL ROAD
GREENSBORO, NORTH CAROLINA

ECS PROJECT 09.11981E



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

March 9, 2011

Mr. Scott R. Lowrie
Heron Bay Acquisition, LLC
3409 Bluegrass Drive
Uniontown, Ohio 44685

Subject: Notification of Initial Brownfield Fees
United Metal Finishing
133 Blue Bell Road
Greensboro, Guilford County
Brownfields Project Number: 15002-11-41

Dear Mr. Lowrie:

Pursuant to N.C.G.S. §130A-310.39, prospective developers participating in the North Carolina Brownfields Program are required to pay an initial fee of \$2,000.00. Make sure to include the Project Number or Project Name above on the check for identification purposes and forward your check, made payable to DENR in the amount of \$2,000.00 to:

N.C. Brownfields Program
Mail Service Center 1646
Raleigh, NC 27699-1646

Once we receive payment of this fee, we will continue negotiations toward finalizing the Brownfields Agreement. At that time, the final payment of \$3,500.00 will become due. Please be advised that a \$25.00 processing fee will be assessed on all returned checks. Thank you for your prompt attention to this important matter.

Sincerely,

Shirley Liggins

Shirley Liggins
Brownfields Program Assistant

Cc: Central Files
Ee: Sharon Eckard, NCDENR

1646 Mail Service Center, Raleigh, North Carolina 27699-1646
Phone: 919-508-8400 \ FAX: 919-715-4061 \ Internet: www.wastenotnc.org

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

Beverly Eaves Perdue
Governor

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Dee Freeman
Secretary

March 9, 2011

Sent Via E-mail and USPS

Mr. Scott R. Lowrie
Heron Bay Acquisition, LLC
3409 Bluegrass Drive
Uniontown, Ohio 44685
scottrlowrie@aol.com

Mr. George W. House, Esq.
Brooks Pierce McLendon Humphrey & Leonard, LLP
P.O. Box 26000
Greensboro, NC 27420
ghouse@brooksperce.com

Subject: Letter of Eligibility
United Metal Finishing
133 Blue Bell Road
Greensboro, Guilford County
Brownfields Project Number 15002-11-41

Dear Sirs:

The North Carolina Department of Environment and Natural Resources (DENR) has received and reviewed your January 24, 2011 Brownfields Property Application (BPA) on behalf of Heron Bay Acquisition, LLC as a Prospective Developer seeking a brownfields agreement regarding the subject site referenced above. Upon review of the information with respect to the requirements of the Brownfields Property Reuse Act of 1997, DENR has determined that this project is eligible for entry into the North Carolina Brownfields Program and for continued evaluation for a Brownfields Agreement on a conditional basis.

The next step in the process will involve a detailed review of available environmental and other relevant data to determine what is currently known about contamination at the site, and to specify information gaps that will require additional assessment. We are in receipt of the following documents submitted with your BPA:

Title	Author	Date
Phase I Environmental Site Assessment, United Metal Finishing, Inc.	ECS	January 20, 2006
Report of Environmental Services	ECS	March 5, 2007

Historical site information from the files of DENR's Division of Waste Management will also be utilized during the evaluation process. Please forward any additional pertinent information or data you may have or can acquire for our evaluation. This should include reports from other DENR agencies or regional offices. We will contact you regarding the

United Metal Finishing, Inc.
March 9, 2011
Page 2

additional assessment that will be necessary to establish that the property is or can be made suitable for the intended reuse, as required by statute.

According to the BPA, the intended redevelopment for the site is upgrading and expansion of existing metal plating operations. This necessitates a rigorous and thorough baseline sampling in any area of the site at which the same or similar operations are planned to continue at locations coinciding with past operations. Because risk management decisions may vary depending on the nature of the redevelopment, it will be important that DENR review the locations of the various elements. Please forward any maps or drawings indicating these details, even if they are only preliminary or conceptual.

Pending execution of a Brownfields Agreement, eligibility is provisional. You do not have the protections such an agreement offers unless and until it is executed. Thus, you operate at the site pending conclusion of a Brownfields Agreement at the risk of jeopardizing your eligibility and/or becoming a party responsible for the contamination at the site if an agreement is not finalized. Therefore please consult closely with our Brownfield Project Manager, Ms. Sharon Eckard, regarding any planned site activities prior to agreement finalization.

If a party other than the Prospective Developer will own the Brownfields property at the conclusion of the brownfields process, the final document (which gets recorded at the Register of Deeds' office) must be signed not only by the Prospective Developer but by that owner. Failure by the Prospective Developer to ensure, by the time Brownfields Agreement negotiations are complete, the willingness to sign of any such party, and to provide DENR the exact name, e-mail address, telephone number and U.S. mail address of the party (along with signatory/signatory's title in the case of an entity) will retard, and could prevent, the Brownfields Agreement taking effect. If the Prospective Developer does not actually buy the property for redevelopment, it loses its eligibility for the Brownfields Program. That means the Prospective Developer itself, not an affiliate or any other party.

We are enthusiastic about the potential for public benefit offered by the upgrade and expansion of the United Metal Finishing, Inc. site, and we look forward to working with you to advance this brownfields redevelopment project. If you have questions about this correspondence or require additional information, please feel free to contact Sharon Eckard by phone at 919.508.8425, or by e-mail at sharon.eckard@ncdenr.gov.

Sincerely,



Linda Culpepper
Deputy Director
Division of Waste Management

cc: Project File

ec: Sharon Eckard, DENR
Bruce Nicholson, DENR
Rob Gelblum, DOJ

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