



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

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

July 8, 2013

Mr. Stephen B. Andrews
A&A Real Estate Services, Inc.
231 Fairfield Road
Reidsville, NC 27320

Mr. William W. Toole
Robinson Bradshaw & Hinson, P.A.
101 North Tryon Street, Suite 1900
Charlotte, NC 28246

RE: VFW Road Contamination
Reidsville, Rockingham County, NC
NONCD0002894

Dear Mr. Andrews and Mr. Toole:

This letter is in response to your April 4, 2013 letter and the attached March 21, 2013 Evaluation of Potential Sources of Groundwater Impact Report prepared by Shield Engineering, Inc., received on April 8, 2013. In your letter you state that the DWM is requesting that owners and operators of the Site conduct a remedial investigation of the VFW Road Contamination (the "Site") due to levels of dieldrin and iron that exceed 2L standards. As stated in my September 4, 2012 and October 26, 2012 letters, several chemicals were detected in the water supply wells (WSWs) sampled along VFW Road including metals, pesticides, and chlorinated solvents. Based on the previous reported releases and investigations at the Zarn property, the Inactive Hazardous Sites Branch (Branch) requested that you conduct an investigation of the Site. For clarification, the Branch is referring to the entire property that was considered the Zarn property which is now two separate parcels.

During investigation activities conducted under the oversight of the UST Section, samples collected from the Zarn property, did exceed the 2L standard for a volatile organic compound as well as initial soil screening levels. The UST Section addressed only the petroleum contamination and did not require further assessment of the chlorinated solvents. Therefore no deep wells were installed and the extent of the chlorinated solvent release was never fully addressed. In addition, elevated metals concentrations were also detected in the vicinity of the waste oil pit during the UST investigation. Additional investigation is necessary to determine if these concentrations are due to naturally occurring conditions or a release/spill.

Based on currently available information, including the information you have provided about other potential sources in the area, the Branch is requesting that you conduct an investigation of the Zarn property to determine if the previously detected contamination is still present. You are also requested to sample the surface water to determine if the herbicide release has impacted the pond. The need for future off-property investigation will be based on the results of the Zarn property investigation. Please submit draft Remedial Investigation Plan (Plan) that complies with the current Inactive Hazardous Sites Branch Guidelines for Assessment and Cleanup (<http://portal.ncdenr.org/web/wm/sf/sfavailabledocs>) within ninety (90) days of receipt of this letter. The draft Plan must be organized and include information outlined in my September 4, 2012 Site Assessment Request letter. Please note that off-property investigation will not be required unless data shows contamination has migrated to adjacent parcels.

In closing, the Branch will further evaluate the information that you have provided regarding potential off-site sources of the contamination detected in the WSWs along VFW Road. However, at this time we do not have any information showing a release or spill at any location in the area other than at the Zarn property. If you obtain any additional information on documented spills or releases, please let me know. If you have any questions, concerning this assessment request, please contact me at (910) 796-7411.

Sincerely,



Sue Robbins
Hydrogeologist
Inactive Hazardous Sites Branch
Superfund Section

cc: Leon S. Niegelsky, NIAM Partnership, 1870 Pennrose Drive, Reidsville, NC 27320
George W. House, Brooks, Pierce, McLendon, Humphrey & Leonard Attorneys and Counselors at Law
Bob Jones, Rockingham County Department of Public Health
Mike Rogers, UST Section – WSRO
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IHSB Files