

Sent Via Email

October 9, 2013

Mr. Matt Aufman
REC Program
Inactive Hazardous Sites Branch
Superfund Section
NC Division of Waste Management
1646 Mail Service Center
Raleigh, NC 27699-1646

Reference: Quarterly Status Report
Trion, Inc., Sanford, NC
NONCD 0002843
H&H Project No. BAI.002

Dear Mr. Aufman:

Hart & Hickman is pleased to provide this quarterly status report for the above-referenced site.

In late June 2013, a groundwater monitoring event of select wells was conducted and a full round of water level measurements were collected. The analytical data were relatively consistent with previous data with the exception of acetone detected in offsite monitoring well DMW-1 at a concentration exceeding the 2L Groundwater Standard. This was a surprise as acetone had not been considered a site-specific constituent of concern.

This well was re-sampled in early August and acetone again exceeded the 2L Groundwater Standard. Discussions with onsite personnel revealed that acetone had been used at the site in relatively small quantities, but use stopped approximately 10 years ago. At that point the REC Program was notified because the deadline for completing the remedial investigation was August 24, 2013. In email correspondence between me and the REC Program personnel, it was documented that due to the unforeseen nature of the acetone issue, the deadline for completion of the RI could be extended with the premise that groundwater remediation would still be initiated by August 24, 2015.

Because both samples from DMW-1 were submitted to the same laboratory, and because acetone had not previously been an issue, the well was sampled again in late August and the sample was sent to a different laboratory for analysis. This time acetone was detected, but below the 2L Groundwater Standard. With two detections above the standard and one below, the well was sampled a fourth time in September and the sample submitted to another independent laboratory. Acetone was detected above the 2L Groundwater Standard. With 3 of 4 sampling events

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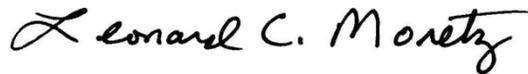
exceeding the 2L Groundwater Standard for acetone, I am convinced this is a site COC and investigation of its source and extent will be conducted.

As discussed with the REC Program personnel, a Phase I RI Report will be submitted with the data collected to date, including the acetone detections. A Phase II RI Workplan will be developed and submitted for investigation of the acetone. The investigation will be conducted and the results submitted in a Phase II RI Report. Once the final RI is completed a Remedial Action Plan will be developed for addressing impacts at the site.

The required certification statements are attached for incorporation into the file. If you have any questions or concerns, please contact me at (919) 847-4241.

Sincerely,

Hart & Hickman, PC



Leonard C. Moretz, L.G., RSM
Project Director/Branch Manager

Attachments

cc: Barrier Advisors, Inc.
As Plan Administrator for Trion, Inc. and
Trustee of the FC Term Lenders Liquidating Trust

Kent E. Hansen
Consultant to Barrier Advisors, Inc.

IHSB SITE NAME Trion, Inc. Site NONCD 0002843

DATE & NAME OF DOCUMENT October 9, 2013 Quarterly Report

TYPE OF SUBMITTAL (circle all that apply): Report, Work plan, Work Phase Comp. Statement, Schedule Change

REMEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(B)(2))

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Kent Hansen, Consultant to Trion
Name of Remediating Party

Kent Hansen
Signature of Remediating Party

October 12, 2013
Date

NOTARIZATION

State of New Jersey (Enter State)

~~Morris~~ Sussex COUNTY

I, Luisa V. Taylor, a Notary Public of said County and State, do hereby certify that Kent E. Hansen did personally appear and sign before me this day, produced proper identification in the form of driver's license, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 12 day of October, 2013.

Luisa Taylor
Notary Public (signature)

(OFFICIAL SEAL)

My commission expires: 3/31/14.

**LUISA V TAYLOR
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES MAR. 31, 2016
I.D.# 2406838**

IHSB SITE NAME Trion, Inc. NONCD 0002843

DATE & NAME OF DOCUMENT October 9, 2013 Quarterly Status Report

TYPE OF SUBMITTAL (circle all that apply): Report, Work plan, Work Phase Comp. Statement, Schedule Change

REGISTERED SITE MANAGER CERTIFICATION OF SIGNATURES

As the Registered Environmental Consultant for the Site for which this filing is made, I certify that the signatures included herewith are genuine and authentic original handwritten signatures and/or true, accurate, and complete copies of the genuine and authentic original handwritten signatures of the persons who purport to sign for this filing. I further certify that I have collected through reliable means the originals and/or copies of said signatures from the persons authorized to sign for this filing who, in fact, signed the originals thereof. Those persons and I understand and agree that any copies of signatures have the same legally binding effect as original handwritten signatures, and I certify that any person for whom I am submitting a copy of their signature has provided me with their express consent to submit said copy. Additionally, I certify that I am authorized to attest to the genuineness and authenticity of the signatures, both originals and any copies, being submitted herewith and that by signing below, I do in fact attest to the genuineness and authenticity of all the signatures, both originals and copies, being submitted for this filing.

Leonard Moretz

Name of Registered Site Manager

Leonard Moretz
Signature of Registered Site Manager

October 15, 2013

Date

REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1))

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Leonard Moretz

Name of Registered Site Manager

Leonard Moretz
Signature of Registered Site Manager

October 15, 2013

Date

NOTARIZATION

North Carolina (Enter State)

Wake COUNTY

I, Ashley Rose, a Notary Public of said County and State, do hereby certify that Leonard Moretz did personally appear and sign before me this day, produced proper identification in the form of Drivers License, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certifications is true and accurate, and he or she then signed these Certifications in my presence.

WITNESS my hand and official seal this 15 day of October, 2013

Ashley Rose
Notary Public (signature)

My commission expires: 12/3/19

