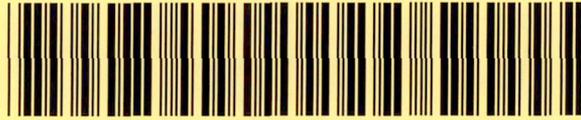


\*143IHSSF3058\*



DocumentID NONCD0002899

Site Name STATELINE SCRAP METAL

DocumentType Correspondence (C)

RptSegment

DocDate 9/14/2012

DocRcvd 9/14/2012

Box SF3058

AccessLevel PUBLIC

Division WASTE MANAGEMENT

Section SUPERFUND

Program IHS (IHS)

DocCat FACILITY

**Adams, George**

---

**From:** Adams, George  
**Sent:** Friday, September 14, 2012 5:12 PM  
**To:** 'feely.ken@epa.gov'  
**Subject:** RE: Stateline Scrap Metal

Ken, just to follow up here. I loaded some additional information and a PCB soil report into our electronic database "documentum" aka CARA, and you are welcome to review.

The link is <https://edm.nc.gov/DENR-Portal/>

And the Site on our SPL is the following:

Stateline Scrap Metal, Inc.  
5401 South York Highway  
Gastonia, Gaston County, North Carolina  
IHSB # NONCD0002899

Please let me know if you need any additional information.

---

**From:** Adams, George  
**Sent:** Thursday, April 19, 2012 10:06 AM  
**To:** 'feely.ken@epa.gov'  
**Subject:** Stateline Scrap Metal

Ken,

Please let me know if you can access the following link. We use the program Filezilla for our FTP, but I'm not sure that is necessary. If you can't access, I can send you a zip file, but it will be about 15 MBs.

<ftp://ftp.dwm.ncdenr.org>  
user name sfpub@ftp.dwm.ncdenr.org  
password sf.public

Directory [/Stateline Scrap Metal Gaston County IHSB # Pending 4-19-12\\_gda](#)

If there is TSCA regulatory jurisdiction here, please let me know. Attached is part of the January 26, 2012 Phase II ESA.

George Adams - [george.adams@ncdenr.gov](mailto:george.adams@ncdenr.gov)  
North Carolina Department of Environment & Natural Resources  
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch  
610 East Center Avenue, Suite 301  
Mooresville, North Carolina 28115  
Phone: (704) 663-1699 Fax: (704) 663-6040

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties unless the content is exempt by statute or other regulation. Please note: my e-mail address has changed to [george.adams@ncdenr.gov](mailto:george.adams@ncdenr.gov)

Submissions of all work plans, reports, and cover letters must now include companion electronic copies on compact disc. Specific requirements including electronic file formats may be found under "[Electronic Document Submittal](#)" at the Inactive Hazardous Sites Program's website.

**Adams, George**

---

**From:** Adams, George  
**Sent:** Tuesday, August 28, 2012 3:16 PM  
**To:** 'Ray, Brian'  
**Cc:** Lenihan, Brian  
**Subject:** RE: NONCD0002899

Thank you.

---

**From:** Ray, Brian [mailto:brian.ray@aecom.com]  
**Sent:** Monday, August 27, 2012 4:52 PM  
**To:** Adams, George; Lenihan, Brian  
**Subject:** RE: NONCD0002899

George,

Attached is a copy of the laboratory report. We apologize that this was not included on the CD.

Let us know if you need anything else.

Brian

---

**From:** Adams, George [mailto:george.adams@ncdenr.gov]  
**Sent:** Monday, August 27, 2012 10:09 AM  
**To:** Lenihan, Brian  
**Cc:** Ray, Brian  
**Subject:** NONCD0002899

Brian,

Will you ask AECOM to email me an electronic copy (.pdf) the laboratory report for the letter report you sent me? It wasn't included on the CD. Thanks. Please contact me if you have questions. --George

George Adams - [george.adams@ncdenr.gov](mailto:george.adams@ncdenr.gov)  
North Carolina Department of Environment & Natural Resources  
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North Carolina Department of Environment and Natural Resources  
Division of Waste Management

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

**CERTIFIED MAIL**  
**Return Receipt Requested**

7010 0780 0000 5519 0072

August 22, 2012

Brian Lenihan  
The David J. Joseph Company  
2045 River Road  
Louisville, Kentucky 40206

Re: **NOTICE OF REC PROGRAM ELIGIBILITY**

**Stateline Scrap Metal, Inc.**  
5401 South York Highway  
Gastonia, Gaston County, North Carolina  
IHSB # NONCD0002899

Dear Mr. Lenihan:

Thank you for submitting the Site Cleanup Checklist/Questionnaire (Questionnaire) and the Supplemental Assessment Letter for the above subject site (Site). The Inactive Hazardous Sites Branch (Branch) has completed review of this information and determined that the Site can be cleaned up through the Registered Environmental Consultant (REC) Program without direct oversight by Branch Staff.

Note that, 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 Inactive Hazardous Sites Response Act (IHSRA).

Under the IHSRA, to receive approval of the assessment and clean up at the Site, you must enter into an administrative agreement with the Branch. Since the Branch has determined that the Site can be cleaned up through the REC Program, execution of an REC-Administrative Agreement (REC-AA) is required. The procedures for entering into an REC-AA are attached. If you have any questions regarding these procedures or the REC Program, please contact the REC Program Manager, Kim Caulk, at (919) 707-8350 or visit the REC Program website at <http://portal.ncdenr.org/web/wm/sf/ihs/recprogram>

Brian Lenihan  
August 22, 2012  
Page 2 of 2

If we do not receive a response from you within the next 60 days indicating your willingness to enter an REC-AA, the Branch will take further action to prioritize the Site. 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 N.C.G.S. 130A-310.3 to compel assessment and cleanup. In addition, if you choose not to conduct a cleanup voluntarily, 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.

If you have additional questions about the requirements that apply to your site, please contact me (704) 663-1699.

Sincerely,



George D. Adams, PG & EI  
Environmental Engineer II  
Department of Environment and Natural Resources  
Division of Waste Management  
Superfund Section - Inactive Hazardous Sites Branch

Enclosure: REC-AA Procedures

cc: Brian Ray  
AECOM  
8540 Colonnade Center Drive, Suite 306  
Raleigh, North Carolina 27615

## Procedures for Obtaining a REC Administrative Agreement

To obtain a Registered Environmental Consultant (REC)-Administrative Agreement (AA), remediating parties (RPs) and RECs should use the following procedures:

1. Contact Kim Caulk, preferably by e-mail at [Kim.Caulk@NCDENR.gov](mailto:Kim.Caulk@NCDENR.gov), and provide the following information for the site:
  - Site name, street address/location, city, and county;
  - Exact name of remediator;
  - Name, title, telephone number, e-mail address, & mailing address of the highest ranking official of the remediating party having day-to-day responsibility for the performance of the remedial response action;
  - Name, title, telephone number, e-mail address, & mailing address of any other contact person(s) and the proposed REC (if known) for the remedial response action;
  - Current property owner of the site.
2. Using the information above, a draft REC-AA will be prepared by the Branch and forwarded, preferably by e-mail, to the RP and any other specified representatives for review. The draft electronic version of the AA will be maintained by the Branch.
3. After the RP and/or REC confirms the information is satisfactory, the AA will be finalized by the Branch and an original, hardcopy of the final document will be mailed to the RP for signature. The RP should then mail the signed **original**, final AA to the REC for signature. The document should then be returned by mail to the Branch for execution. The Branch will forward a photocopy of the AA to the RP and REC following execution.
4. Before the AA can be executed, the following requirements must be completed:
  - A 30-day public notice for the proposed AA must be performed by the Branch in accordance with 130A-310.9(b). Note that this includes sites already undergoing groundwater remediation and previously under the oversight of the Division of Water Quality. To complete the required 30-day public notice, the proposed REC and/or the Remediating Party will need to submit, preferably by e-mail, a site location map (typically a tax map or parcel map) and the mailing addresses for each of the adjacent surrounding property owners. The reference/source of the submitted information should be included;
  - Pursuant to 15A NCAC 13C .0307(c), to participate in the REC Program, payment of a financial assurance fee must be received by the Branch. The fee for entry of the site into the REC Program is \$2500. Checks should be made payable to NC Division of Waste Management and referenced to the REC Trust Fund. There will be a similar fee each year until remediation at the site is complete. The annual administration fee, which is to help offset the costs of the Division's audits of remedial actions, is based on the number of sites in the REC Program and in recent years has varied from approx. \$1800 to \$2500.

The required public notice can begin while the AA is reviewed/finalized and the fees are processed.

Questions regarding these procedures and the REC Program should be directed to Kim Caulk at (919) 707-8350 or [Kim.Caulk@NCDENR.gov](mailto:Kim.Caulk@NCDENR.gov).



NORTH CAROLINA DEPARTMENT OF  
 ENVIRONMENT AND NATURAL RESOURCES  
 MOORESVILLE REGIONAL OFFICE  
 610 EAST CENTER AVENUE, SUITE 301  
 MOORESVILLE NC 28115

DWM IHW / *SWA*

**CERTIFIED MAIL™**



7010 0780 0000 5519 0072



02 1P  
 0003181127 AUG 22 2012  
 MAILED FROM ZIP CODE 28115  
**\$ 005.75<sup>00</sup>**

**RECEIVED**

SEP - 4 2012

NCDENR MRO IHSB

*OKed*  
*ANK*  
*8/28/12*

Brian Lenihan  
 The David J. Joseph Company  
 2045 River F  
 Louisville, K

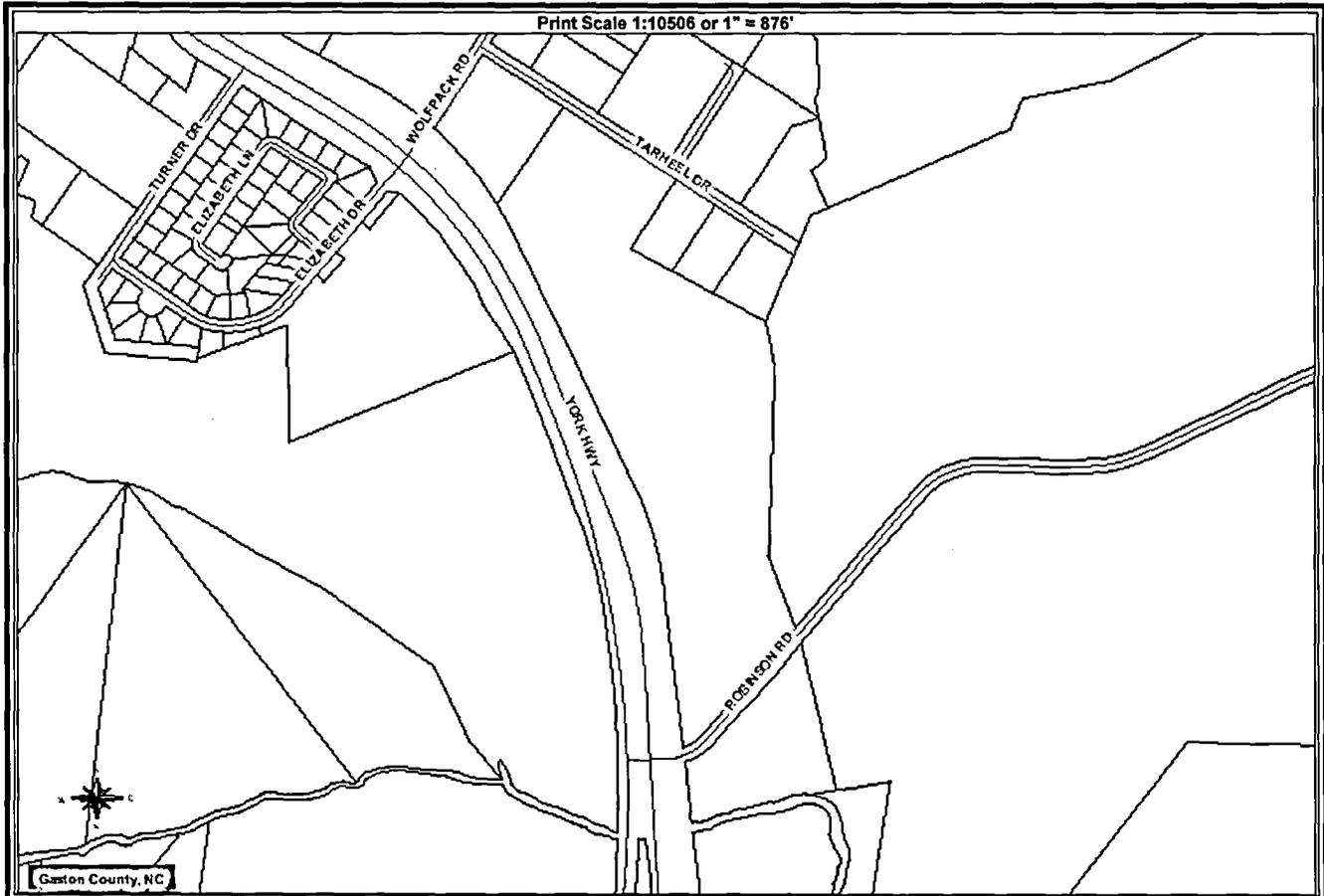
NIXIE 402 7E 1 00 08/29/12  
 RETURN TO SENDER  
 ATTEMPTED - NOT KNOWN  
 UNABLE TO FORWARD  
 BC: 28115257899 \*2248-06859-22-38

40208100643 578





**Gaston County, NC**  
**Office of the Director of Revenue, GIS Division**  
 Disclaimer: The information provided is not to be considered as a Legal Document or Description. The Map and Parcel Data is believed to be accurate, but Gaston County does not guarantee its accuracy.  
 Values based on last general reappraisal - 2007  
 Print Date: 5/21/2012



**PARCEL INFORMATION**

PID #: 216278 PIN #: 3542-45-0656 NEIGH.HOOD #: GA006 NEIGH.HOOD NAME: 321 SOUTH TO YORK COUNTY	PROPERTY ADDRESS: 5401 YORK HWY DEED BOOK: 4601 DEED PAGE: 0647 DEED TYPE: SWD SALES AMOUNT: \$2,265,000 DEED RECORDING DATE: 03/14/2012 PLAT BOOK: PLAT PAGE: LEGAL DESC 1: . LEGAL DESC 2:	BASEMENT: NO # BEDROOMS: 0 # BATHS: 0 MULTI-STRUCTURES: YES ACREAGE: 40.61
OWNER ID #: 1615453 CURRENT OWNER 1: METAL RECYCLING SERVICES LLC CURRENT OWNER 2: MAILING ADDRESS 1: 541 BUTTERMILK PIKE STE 305 MAILING ADDRESS 2: CITY: CRESCENT SPRINGS STATE: KY ZIP CODE: 41017-1689 JAN1 OWNER 1: MILL CREEK MANAGEMENT LLC JAN1 OWNER 2:	STRUCTURE CODE #: STOR5 STRUCTURE TYPE: WAREHOUSE YEAR BUILT: 1993 SQ FT: 1200	TAX DISTRICT: S. GASTONIA FD TOWNSHIP CODE: 10 TOWNSHIP DESC: GASTONIA TOWNSHIP VOLUNTARY AG DIST: NO LAND VALUE: \$336,237 IMPV. VALUE: \$445,154 TOTAL VALUE: \$781,391 PRESENT USE VALUE ASSESSMENT: NO

www.djj.com/news  
5-21-12 gku

Mar

13

### 2012 Metal Recycling Services Acquires State Line Scrap Metal

On March 12, 2012, Metal Recycling Services, wholly owned by The David J. Joseph Company (DJJ), a Cincinnati-based subsidiary of Nucor Corporation, purchased the assets and business of State Line S...

On March 12, 2012, Metal Recycling Services, wholly owned by The David J. Joseph Company (DJJ), a Cincinnati-based subsidiary of Nucor Corporation, purchased the assets and business of State Line Scrap Metal. Founded in 1991, State Line Scrap Metal operates a full-service scrap processing facility (including an automobile shredder) at 5401 S. York Highway, Gastonia, North Carolina and one Marion, North Carolina feeder yard.

The addition of these two locations is consistent with MRS's growth strategy and demonstrates DJJ's commitment to expanding its existing regional recycling platforms.

Founded in 1885, DJJ is one of the largest scrap brokers/processors in the United States providing scrap brokerage, recycling and transportation services. Nucor and affiliates are manufacturers of steel products, with operating facilities primarily in the U.S. and Canada. Nucor is the leading purchaser of ferrous scrap and the largest recycler in North America. Across the USA, DJJ now operates 68 scrap recycling facilities including 16 automobile shredders, and seven U-Pull-&-Pay self-service used auto parts stores.

**Adams, George**

**From:** Adams, George  
**Sent:** Monday, May 21, 2012 2:00 PM  
**To:** 'Lenihan, Brian'  
**Subject:** (Surveying Sample Points) Stalene NONCD0002899

Apologies, just got your voice mail. Just let me know if I need to call you.

---

**From:** Adams, George  
**Sent:** Monday, May 21, 2012 1:40 PM  
**To:** 'Lenihan, Brian'  
**Subject:** RE: Surveying Sample Points

Yes, I believe so. Your consultant needs to include easting and northing coordinates or at least latitude and longitude (decimal degrees to at least five decimal places) in the report. Typically, we require a professional land surveyor to shoot the locations. But we are only requesting three and I would like to keep your expenses as low as possible. We only need a simple letter report with laboratory report, summary table, scaled sample location figure, sealed by a PG or PE, with the certification statement as described. The letter report needs to follow the general administrative and technical procedures in our guidelines.

We also requested a Site Cleanup Questionnaire, which may appear duplicative to the Site Notification Form you have previously sent. But the assessment reports that AECOM are not sealed or "stamped" by a PG or PE and that was the easiest thing that I could come up with. Please contact me if you have any questions. Thanks-G

North Carolina Department of Environment & Natural Resources  
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch  
610 East Center Avenue, Suite 301  
 Mooresville, North Carolina 28115  
Phone: (704) 663-1699 Fax: (704) 663-6040

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---

**From:** Lenihan, Brian [mailto:Brian.Lenihan@DJJ.com]  
**Sent:** Monday, May 21, 2012 1:08 PM  
**To:** Adams, George  
**Subject:** Surveying Sample Points

Our consultant can use the following instrument:

[http://www.trimble.com/mappingGIS/geo6.aspx?dtID=technical\\_specs](http://www.trimble.com/mappingGIS/geo6.aspx?dtID=technical_specs)

Would this meet your requirements? Thanks.

Brian Lenihan, CHMM

Environmental Specialist

*The David J. Joseph Company  
2045 River Road  
Louisville, Kentucky 40206  
Office: 502-212-7386  
Fax: 502-587-8699  
Cell: 502-715-1426*

This e-mail contains privileged and confidential information which is the property of The David J. Joseph Company, intended only for the use of the intended recipient(s). Unauthorized use or disclosure of this information is prohibited. If you are not an intended recipient, please immediately notify the David J. Joseph Company and destroy any copies of this email. Receipt of this e-mail shall not be deemed a waiver by the David J. Joseph Company of any privilege or the confidential nature of the information.

**Adams, George**

---

**From:** Lenihan, Brian [Brian.Lenihan@DJJ.com]  
**Sent:** Monday, May 21, 2012 2:04 PM  
**To:** Adams, George  
**Subject:** RE: Surveying Sample Points

Got it, thanks!

Brian Lenihan, CHMM  
Environmental Specialist

*The David J. Joseph Company*  
2045 River Road  
Louisville, Kentucky 40206  
Office: 502-212-7386  
Fax: 502-587-8699  
Cell: 502-715-1426

---

**From:** Adams, George [mailto:george.adams@ncdenr.gov]  
**Sent:** Monday, May 21, 2012 1:40 PM  
**To:** Lenihan, Brian  
**Subject:** RE: Surveying Sample Points

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Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch  
610 East Center Avenue, Suite 301  
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**From:** Lenihan, Brian [mailto:Brian.Lenihan@DJJ.com]  
**Sent:** Monday, May 21, 2012 1:08 PM

**To:** Adams, George  
**Subject:** Surveying Sample Points

Our consultant can use the following instrument:

[http://www.trimble.com/mappingGIS/geo6.aspx?dtID=technical\\_specs](http://www.trimble.com/mappingGIS/geo6.aspx?dtID=technical_specs)

Would this meet your requirements? Thanks.

Brian Lenihan, CHMM  
Environmental Specialist

*The David J. Joseph Company*  
2045 River Road  
Louisville, Kentucky 40206  
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DIVISION OF WASTE MANAGEMENT

SUPERFUND SECTION

INACTIVE HAZARDOUS SITES BRANCH

MOORESVILLE REGIONAL OFFICE

CALL TO: George Adams 502-212-7386

CALL FROM: Brian Kenihan 502-715-1424

DATE/TIME: 5-18-12 - 1032

RE: State line -

TELEPHONE LOG:

5-18-12 → Brian left a message for a return  
1032 call regarding the sample locations

5-21-12 → I left a message explaining that  
0820 I would consider other options than  
a professional land surveyor, provided  
I could discuss the consultants capabilities  
before they began fieldwork.

5-21-12 → He returned my call and  
1110 left a voice mail - I responded  
by email.

**Adams, George**

---

**From:** Adams, George  
**Sent:** Tuesday, May 08, 2012 4:21 PM  
**To:** 'Brian Lenihan'  
**Subject:** Stateline Scrap Metal NONCD0002899

Brian,

I've spoken with our toxicologist and I have performed a rapid review of the Site data again for the following:

Stateline Scrap Metal  
5401 South York Hwy  
Gastonia, Gaston County, North Carolina  
NONCD00028999

I will agree to amend the May 4, 2012 Notice of Regulatory Requirements (NORR) as we discussed today. Specifically, I will modify the requirements of the "**Supplemental Site Assessment Letter Report**" to "strongly recommend" (instead of require) that the laboratory analyses of soil samples collected from the drainage swales (from the three aforementioned stormwater ponds) include Volatile Organic Compounds, Semi-Volatile Compounds, Antimony, Arsenic, Beryllium, Cadmium, Chromium, Copper, Lead, Manganese, Mercury, Nickel, Selenium, Silver, Thallium, and Zinc. I will also amend the requirements to only "strongly recommend" the establishment of Site-specific background concentrations for metals.

Please note: you are still required to complete the remaining items listed in the NORR including (without limitation) submitting a completed Site Cleanup Questionnaire and the **Supplemental Site Assessment Letter Report** to our office. The **Supplemental Site Assessment Letter Report** will include (without limitation) performing soil sampling of the three swales below the outfalls of the ponds and submitting these samples for laboratory analyses of Polychlorinated Biphenyl (PCBs). You will also need to adequately determine the location of these soil samples, which is typically done by a professional land survey. (Please discuss options with me before the commencement of field activities).

If you have any questions or if you don't believe this email represents what we discussed today, please contact me.  
Thanks--George

George Adams - [george.adams@ncdenr.gov](mailto:george.adams@ncdenr.gov)  
North Carolina Department of Environment & Natural Resources  
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch  
610 East Center Avenue, Suite 301  
Mooresville, North Carolina 28115  
Phone: (704) 663-1699 Fax: (704) 663-6040

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DIVISION OF WASTE MANAGEMENT

SUPERFUND SECTION

INACTIVE HAZARDOUS SITES BRANCH

MOORESVILLE REGIONAL OFFICE

CALL TO: George Adams

CALL FROM: Brian Kenihan

DATE/TIME: 5-8-12 / 1300

RE: State line Scrap

TELEPHONE LOG:

I discussed the site NORR w/ him. I asked if he had bought the property or assets or the former company. He said they acquired the former company. I told him that I asked b/c maybe I could have sent the NORR to them. I understood he had assumed the environmental liability. He proposed a reduction in the sampling. I told him that we would discuss and follow up. I also explained that UST would send a petition now. I told him that most of the requested constituents weren't being performed at the stormwater outfall under the permit.

George Adams - George.Adams@ncdenr.gov  
North Carolina Dept. of Environment & Natural Resources  
Div. of Waste Mgt. - Superfund Section - Inactive Hazardous Sites Branch  
610 E. Center Ave., Suite 301  
 Mooresville, NC 28115  
Ph: (704) 663-1699 Fax: (704) 663-6040



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

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

**CERTIFIED MAIL**

**Return Receipt Requested - 7003 2260 0001 3494 5932**

May 4, 2012

Brian Lenihan  
The David J. Joseph Company  
2045 River Road  
Louisville, Kentucky 40206

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

**Stateline Scrap Metal, Inc.**  
5401 South York Highway  
Gastonia, Gaston County, North Carolina  
IHSB # NONCD0002899

Dear Mr. Lenihan:

We received your March 23, 2012 Notification of an Inactive Hazardous Substance or Waste Site, which reports that your site has been contaminated by one or more hazardous substances. Depending on the contaminants involved and whether the contaminants have impacted or may impact groundwater quality, you will be required to assess and cleanup the contamination under one or more cleanup authorities. Regulatory oversight for the assessment and cleanup under all applicable authorities will be provided by the Division of Waste Management through its Superfund Section, Inactive Hazardous Sites Branch ("Branch").

Based on information provided to date, the Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310, *et seq.*, applies to your site. In addition, initial immediate actions may be required under 15A NCAC 2L, Groundwater Classifications and Standards.

**I. ACTIONS REQUIRED AT THIS TIME:**

**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.

**Complete the Site Cleanup Questionnaire.**

To comply with the requirements of State law, a Site Cleanup Questionnaire, available on the website noted at the end of this letter, 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.

**Supplemental Site Assessment Letter Report**

Within ninety (90) days of your receipt of this letter, please submit Supplemental Site Assessment Letter Report that complies with the technical and administrative procedures outlined in the current Inactive Hazardous Site's Program *Guidelines for Assessment and Cleanup (Guidelines)*. <http://portal.ncdenr.org/web/wm/sf/ihs/ihsguide>  
The letter report will include (without limitation) the following:

1. Surficial soil sampling of the drainage swales that convey stormwater from the facility's three stormwater outfalls to the unnamed tributary of Crowders Creek. The soil samples will be collected near the entrance to the unnamed tributary and analyzed for the following constituents: Volatile Organic Compounds, Semi-Volatile Compounds, Polychlorinated Biphenyl (PCBs), Antimony, Arsenic, Beryllium, Cadmium, Chromium, Copper, Lead, Manganese, Mercury, Nickel, Selenium, Silver, Thallium, and Zinc.
2. You will need to establish site-specific natural background levels for the following metals if they are suspected or known to exceed Branch Remediation Goals: Antimony, Arsenic, Beryllium, Cadmium, Chromium, Copper, Lead, Manganese, Mercury, Nickel, Selenium, Silver, Thallium, and Zinc.
3. All procedures and reporting must be conducted pursuant to the *Guidelines*.
4. A narrative describing how the assessment was conducted; a discussion of any variances from the *Guidelines*; and a summary of site observations, field activities, sampling results, standard protocols, and conclusions;
5. An accurate map drawn to scale that shows all soil sample locations;
6. A description of all laboratory quality control, quality assurance, and decontamination procedures;
7. A summary tabulation of all analytical results with sampling dates, depths, and copies of all laboratory reports;
8. Any other information required by the Branch or considered relevant by The David J. Joseph Company;
9. A signed and notarized certification by a representative of The David J. Joseph Company "I certify that, to the best of my knowledge, after a thorough investigation, the information contained in or accompanying this certification is true, accurate, and complete;" and,

10. A signed and notarized certification by the consultant responsible for the day to day remedial activities stating, "I certify that, to the best of my knowledge, after thorough investigation, the information contained in or accompanying this certification is true, accurate, and complete."
11. Any work that would constitute the "practice of engineering" as defined by N.C. Gen. Stat. 89C shall be performed under the responsible charge of, and signed and sealed by, a professional engineer registered in the state of North Carolina. Any work that would constitute the "public practice of geology" as defined by N.C. Gen. Stat. 89E shall be performed under the responsible charge of, and signed and sealed by, a geologist licensed in the state of North Carolina.

## **II. FUTURE ASSESSMENT AND CLEANUP ACTIVITIES:**

All correspondence and reporting for 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").

## **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) and the information contained within the letter report, 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 the web address. <http://portal.ncdenr.org/web/wm/sf/ihs/recprogram> If you have any questions specific to the REC Program, including how to participate, please contact the REC Program Manager, Kim Caulk, at (919) 707-8350.

**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 and the requested letter report within ninety (90) days, 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 N.C. Gen. Stat. § 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://portal.ncdenr.org/web/wm/sf/ihs/home>.

Submit completed questionnaire & letter report to:

George Adams  
NCDENR - Inactive Hazardous Sites Branch  
610 East Center Avenue, Suite 301  
Mooresville, North Carolina 28117

All documents submitted to the Division in relation to this work must be provided in both paper and in an electronic format designated by the Division (see the Inactive Hazardous Sites Branch website located at <http://portal.ncdenr.org/web/wm/sf/ihs/home> for current specifications on electronic document submittal). If you have questions or need further information, please contact me at (704) 663-1699.

Sincerely,



George D. Adams, PG & EI  
Environmental Engineer II  
Department of Environment and Natural Resources  
Division of Waste Management  
Superfund Section - Inactive Hazardous Sites Branch

cc: Brian Ray  
AECOM  
8540 Colonnade Center Drive, Suite 306  
Raleigh, North Carolina 27615

2993 3494 1000 0001 2260 0001 3494 5932

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Total Postage Brian Lenihan  
Sent To The David J. Joseph Company  
2045 River Road  
Louisville, Kentucky 40206  
Street, Apt. No. or PO Box No  
City, State, Zi

PS Form 3800, June 2002

See Reverse for instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Brian Lenihan  
The David J. Joseph Company  
2045 River Road  
Louisville, Kentucky 40206

5-3-12

14W-GA

2. Article Number

(Transfer from service label)

7003 2260 0001 3494 5932

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1549

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature *[Signature]*  Agent  Addressee

B. Received by (Printed Name) *Yorany Domec* C. Date of Delivery *5-11-12*

D. Is delivery address different from item 1?  Yes  No  
If YES, enter delivery address below:

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

UNITED STATES POSTAL SERVICE

LOUISVILLE KY 40201

11 MAY 2012 PM 5 T

First Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

**RECEIVED**

Sender: Please print your name, address, and ZIP+4 in this box

MAY 14 2012

NCDENR DENR *[Signature]*  
610 E. Center Ave., Ste. 301  
Mooresville NC 28115

5-3-12

GA

DIVISION OF LAND RESOURCES  
LAND QUALITY SECTION

MAY 14 2012

DEPARTMENT OF ENVIRONMENT  
AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

SUPERFUND SECTION

INACTIVE HAZARDOUS SITES BRANCH

MOORESVILLE REGIONAL OFFICE

CALL TO: Brian Lenihan 502-212-7386

CALL FROM: George Adams

DATE/TIME: 4-23-12 - 1630

RE: Stateline Scrap Metal -

TELEPHONE LOG:

4-23-12

1630 => I left a voice mail message for return call.

4-24-12

1030

=> I discussed w/ Brian. I asked what he wanted to do. I explained that the Haz substances did not appear to represent evidence of site that would be among our highest priority. However there was oil and grease which was regulated by UST, and PCBs are regulated by TSCA. The EPA will likely require a deed recordation if you choose to do nothing. I'm not sure about UST, but probably could easily address w/ FITSB cleanup. I couldn't avoid adding to the SPL. He indicated he would check w/ management and then follow up with me.

DIVISION OF WASTE MANAGEMENT

SUPERFUND SECTION

INACTIVE HAZARDOUS SITES BRANCH

MOORESVILLE REGIONAL OFFICE

CALL TO: George Adam

CALL FROM: Ken Feely - EPA

DATE/TIME: 4-20-12 / 1330 -

RE: State line Scrap Metal -

TELEPHONE LOG:

Ken returned my call. He said that they were several hits of PCBs  $> 1 \text{ ppm}$ , so at a minimum a land use restriction. But they are willing to assist through the IHSB. I explained that we were trying to evaluate the site for a self directed cleanup but I didn't necessarily want to do that if the EPA wanted to direct work. But I was also waiting on our toxicologists - view to evaluate ecological risks. So we agreed to follow up once I talk to the PRP. PCBs  $> 1 \text{ ppm}$  - or water  $> \text{not } 0.5 \text{ ppm}$  need to let Region IV know about it. He said it was very difficult to determine how and when the PCBs were released.

DIVISION OF WASTE MANAGEMENT

SUPERFUND SECTION

INACTIVE HAZARDOUS SITES BRANCH

MOORESVILLE REGIONAL OFFICE

CALL TO: Ken Feely - 484-562-8512

CALL FROM: George Adams

DATE/TIME: 4-19-12 / 0840

RE: State Line Scrap PCBs - TSCA

TELEPHONE LOG:

0840

I left a detailed message for Ken and requested a return call. I wanted to know if there were <sup>st</sup> TSCA related issues for a site of PCBs in the storm water pond - <sup>st</sup>

20950 → Ken returned my call and I agreed to send him the information to review.

**Adams, George**

---

**From:** Adams, George  
**Sent:** Thursday, April 19, 2012 11:32 AM  
**To:** 'Ken Feely'  
**Subject:** RE: Stateline Scrap Metal  
**Attachments:** image001.gif

Thanks Ken, just let me know if you need anything else.

---

**From:** Ken Feely [mailto:Feely.Ken@epamail.epa.gov]  
**Sent:** Thursday, April 19, 2012 11:26 AM  
**To:** Adams, George  
**Subject:** Re: Stateline Scrap Metal

George,

Thanks. Worked like a charm.

I'll be in touch.

*Ken Feely | Regional PCB Coordinator  
USEPA Region 4 | Atlanta Federal Center 9T25 | 61 Forsyth Street SW | Atlanta, Georgia 30303  
or: 404.562.8512 | F: 404.562.9064 | feely.ken@epa.gov*

▼ "Adams, George" —04/19/2012 10:09:03 AM—Ken, Please let me know if you can access the following link. We use the program Filezilla for our

**From:** "Adams, George" <george.adams@ncdenr.gov>  
**To:** Ken Feely/RA/USEPA/US@EPA  
**Date:** 04/19/2012 10:09 AM  
**Subject:** Stateline Scrap Metal

---

Ken,

Please let me know if you can access the following link. We use the program Filezilla for our FTP, but I'm not sure that is necessary. If you can't access, I can send you a zip file, but it will be about 15 MBs.

<ftp://ftp.dwm.ncdenr.org>  
user name [sfpub@ftp.dwm.ncdenr.org](mailto:sfpub@ftp.dwm.ncdenr.org)  
password sf.public

Directory [/Stateline Scrap Metal Gaston County IHSB # Pending 4-19-12.gda](#)

If there is TSCA regulatory jurisdiction here, please let me know. Attached is part of the January 26, 2012 Phase II ESA.

George Adams - [george.adams@ncdenr.gov](mailto:george.adams@ncdenr.gov)  
North Carolina Department of Environment & Natural Resources  
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch

610 East Center Avenue, Suite 301  
Mooresville, North Carolina 28115  
Phone: (704) 663-1699 Fax: (704) 663-6040

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties unless the content is exempt by statute or other regulation. Please note: my e-mail address has changed to [george.adams@ncdenr.gov](mailto:george.adams@ncdenr.gov)

Submissions of all work plans, reports, and cover letters must now include companion electronic copies on compact disc. Specific requirements including electronic file formats may be found under "[Electronic Document Submittal](#)" at the Inactive Hazardous Sites Program's website.

[attachment "Stateline Scrap Metal 1-26-12 Phase II ESA pages 1 to 23 only.pdf" deleted by Ken Feely/RA/USEPA/US]

**Adams, George**

---

**From:** Bell, Wes  
**Sent:** Thursday, April 19, 2012 8:42 AM  
**To:** Adams, George  
**Cc:** Allocco, Marcia  
**Subject:** RE: State Line Scrap (Gaston County) NCG200451 / NCS000000515 / IHSB # not assigned

Thanks for the info. I'll be out in the field today but we can discuss the results Friday.

---

**From:** Adams, George  
**Sent:** Thursday, April 19, 2012 8:33 AM  
**To:** Bell, Wes; Allocco, Marcia  
**Subject:** State Line Scrap (Gaston County) NCG200451 / NCS000000515 / IHSB # not assigned

Concentrations of PCB's that exceed EPA Region IV screening levels for sediment were detected in stormwater ponds from the above referenced facility. I'm going to talk to Region IV a little later today, but if you folks want to review any data that I have for CWA applicability (NPDES # NCG200451), let me know.

George Adams - [george.adams@ncdenr.gov](mailto:george.adams@ncdenr.gov)  
North Carolina Department of Environment & Natural Resources  
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch  
610 East Center Avenue, Suite 301  
Mooresville, North Carolina 28115  
Phone: (704) 663-1699 Fax: (704) 663-6040

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Submissions of all work plans, reports, and cover letters must now include companion electronic copies on compact disc. Specific requirements including electronic file formats may be found under "[Electronic Document Submittal](#)" at the Inactive Hazardous Sites Program's website.

**Adams, George**

---

**From:** Brian Lenihan [Brian.Lenihan@DJJ.com]  
**Sent:** Wednesday, April 18, 2012 7:56 AM  
**To:** Adams, George  
**Subject:** RE: State Line Scrap NCG200451 / NCS000000515 / IHSB # not assigned

The sediment samples were actual sediment samples collected 0-1 foot below the bottom of each detention pond. The permit referenced is the NPDES permit for the site. Let me know if you have any additional questions. Thanks.

Brian Lenihan, CHMM  
Environmental Specialist

*The David J. Joseph Company*  
2045 River Road  
Louisville, Kentucky 40206  
Office: 502-212-7386  
Fax: 502-587-8699  
Cell: 502-715-1426

---

**From:** Adams, George [mailto:george.adams@ncdenr.gov]  
**Sent:** Tuesday, April 17, 2012 3:24 PM  
**To:** Brian Lenihan  
**Cc:** brian.ray@aecom.com  
**Subject:** RE: State Line Scrap NCG200451 / NCS000000515 / IHSB # not assigned

Brian,

We received the CD this morning from AECOM. Thank you. Would you ask AECOM to confirm when time permits, that the sediment samples referenced in the Phase II ESA from January 26, 2012 are sediment from the storm water detention ponds permitted through NPDES # NCG200451? I just want to be sure that it's actually "sediment" from the ponds and not soil that was collected near or nearby the ponds. The IHSB remedial goals for sediment are different than soil, and both were included in Table 3 of the report.

---

**From:** Adams, George  
**Sent:** Monday, April 16, 2012 11:44 AM  
**To:** 'Brian Lenihan'  
**Subject:** RE: State Line Scrap

The more information, the better. I'll read everything and then contact you. Thanks for the follow up. --George

---

**From:** Brian Lenihan [mailto:Brian.Lenihan@DJJ.com]  
**Sent:** Monday, April 16, 2012 10:26 AM  
**To:** Adams, George  
**Subject:** RE: State Line Scrap

George,

AECOM is dropping CD in the mail today. Let me know how the review goes, thanks.

Brian Lenihan, CHMM  
Environmental Specialist

*The David J. Joseph Company*  
2045 River Road  
Louisville, Kentucky 40206  
Office: 502-212-7386  
Fax: 502-587-8699  
Cell: 502-715-1426

---

**From:** Adams, George [mailto:george.adams@ncdenr.gov]  
**Sent:** Friday, April 13, 2012 3:36 PM  
**To:** Brian Lenihan  
**Subject:** RE: State Line Scrap

The attachment was very helpful. I'm working from a remote location, and based on a rapid and cursory review of what you sent, it doesn't appear that the groundwater (where sampled) has been impacted, which if accurate, is a positive. But I'm having a little trouble putting it together.

If you could, please ask AECOM to send me the report in its entirety on a CD (way to large to email) along with the Phase I ESA. They can just drop it in the mail and send it to me at the address below. I'll try to follow up with you Monday. Have a great weekend. --George

George Adams - george.adams@ncdenr.gov  
North Carolina Department of Environment & Natural Resources  
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch  
610 East Center Avenue, Suite 301  
Mooresville, North Carolina 28115  
Phone: (704) 663-1699 Fax: (704) 663-6040

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---

**From:** Brian Lenihan [Brian.Lenihan@DJJ.com]  
**Sent:** Friday, April 13, 2012 10:53 AM  
**To:** Adams, George  
**Subject:** State Line Scrap

George,

Attached is the text from our due diligence report associated with the data tables you already have. I hope this gives you a better perspective of the sampling conducted at the site. If you need additional information please let me know. Thanks.

Brian Lenihan, CHMM  
Environmental Specialist

*The David J. Joseph Company*  
2045 River Road  
Louisville, Kentucky 40206  
Office: 502-212-7386  
Fax: 502-587-8699  
Cell: 502-715-1426

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APR 17 2012

NCDENR MRO IHSB

## Letter of Transmittal

---

George Adams  
NCDENR DWM IHSB  
610 East Center Avenue,  
Suite 301

Attention: Mooreville, NC 28115 Date: April 16, 2012

Project reference: State Line Scrap Metal Facility – Gastonia, NC Project number: \_\_\_\_\_

---

**We are sending you the following:**

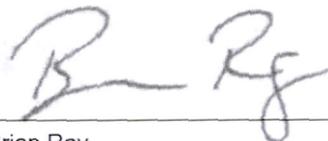
Number of originals:	Number of copies:	Description:
CD	0	Phase 1 ESA – AECOM January 2012 Phase 2 Site Assessment Results Letter – AECOM January 2012

---

George,

On behalf of The David J. Joseph Company, please find enclosed a CD with a copy of the above-referenced reports. If you have any questions or need additional information, please contact Brian Lenihan at 50-212-7386.

Sincerely,



Brian Ray

cc: Brian Lenihan – The David J. Joseph Company

DIVISION OF WASTE MANAGEMENT

SUPERFUND SECTION

INACTIVE HAZARDOUS SITES BRANCH

MOORESVILLE REGIONAL OFFICE

CALL TO: Brian Kenihan - 502-212-7386-

CALL FROM: George Adams

DATE/TIME: 4-3-12 - 1700

RE: State Line Scrap -

TELEPHONE LOG:

4-3-12 - 1700

I left a message for Brian and asked him to contact me via email so I could appropriately route his site to the correct location.

4-5-12 - 1005 -

I spoke to Brian and I confirmed receipt of his email but I thought it was easier in this case for ~~him~~<sup>me</sup> to just ask for the type of data that I needed. I didn't understand the context of the sampling and I was wondering if he would send me all the environmental reports including this AECOM stuff. I would try to get data from WPDGS / RCR. He thought the PCBs could be from some electrical equipment that was recycled -

**Adams, George**

**From:** Adams, George  
**Sent:** Monday, April 02, 2012 4:41 PM  
**To:** 'Michael Burns'  
**Subject:** RE: Merchants Metals NONCD0002892 / NCD980710602

Thank you. This is very helpful.

---

**From:** Michael Burns [mailto:m burns@ESINC.CC]  
**Sent:** Monday, April 02, 2012 4:36 PM  
**To:** Adams, George  
**Subject:** RE: Merchants Metals NONCD0002892 / NCD980710602

Mr. Adams,

The CD that includes the requested reports was mailed to you today. The stormwater runoff field notes that include the turbidity data are attached. Turbidity readings were not performed for the surface water samples collected from the stream. The samples were noted to be clear and free of visible sediment.

Mike Burns



**Mike Burns**  
524 S. New Hope Road | Raleigh, NC 27610  
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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---

**From:** Adams, George [mailto:george.adams@ncdenr.gov]  
**Sent:** Friday, March 30, 2012 10:38 AM  
**To:** Michael Burns  
**Subject:** RE: Merchants Metals NONCD0002892 / NCD980710602

We appreciate your efforts. Thank you. --George

---

**From:** Michael Burns [mailto:m burns@ESINC.CC]  
**Sent:** Friday, March 30, 2012 10:21 AM  
**To:** Adams, George  
**Subject:** RE: Merchants Metals NONCD0002892 / NCD980710602

George,

I am in the process of putting all of the requested reports/documents onto a disk and mailing it to you. I apologize for not including that message in the email.



**Mike Burns**

524 S. New Hope Road | Raleigh, NC 27610  
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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---

**From:** Adams, George [mailto:george.adams@ncdenr.gov]  
**Sent:** Friday, March 30, 2012 10:13 AM  
**To:** Michael Burns  
**Subject:** Merchants Metals NONCD0002892 / NCD980710602

Mr. Burns,

On behalf of your client, thank you for submitting the site cleanup questionnaire for Merchant Metals, Inc. (NONCD0002892) in Statesville, Iredell County, North Carolina. In order for me to evaluate REC eligibility, I need you to provide previously requested data including (without limitation), field sampling forms for the surface water and storm water samples, all environmental assessments and reports including copies of the original reports from Terracon, and the facility's storm water plan (SW3P). Please indicate if you are unable to provide this information. The IHSB assigned ID # for this Site is NONCD0002892.

We appreciate your efforts to submit data electronically. Please apply OCR (Optical Characteristic Recognition) to all PDFs. Further information regarding Electronic Document Submittal can be found at the link below. If you have questions or need additional information, please contact me--George

George Adams - george.adams@ncdenr.gov  
North Carolina Department of Environment & Natural Resources  
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch  
610 East Center Avenue, Suite 301  
Mooresville, North Carolina 28115  
Phone: (704) 663-1699 Fax: (704) 663-6040

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Submissions of all work plans, reports, and cover letters must now include companion electronic copies on compact disc. Specific requirements including electronic file formats may be found under "[Electronic Document Submittal](#)" at the Inactive Hazardous Sites Program's website.

UST  
Carolina B Y-Products  
# 8410 MO-3292

5533 York Hwy -  
Gastonia - CD36

---

Gaston County  
# <sup>16050</sup> ~~10650~~ MO-4799  
502 York St CD114



AECOM  
8540 Colonnade Center Drive Suite 306  
Raleigh, NC 27615

919.872.6600 tel  
919.872.7996 fax

January 26, 2012

Eric Logsdon  
Corporate Environmental Manager  
The David J. Joseph Company  
300 Pike Street  
Cincinnati, Ohio 45202

By electronic mail to: EML@DJJ.com

**Subject: Phase II Environmental Site Assessment Results  
State Line Scrap Metal Facility  
Gastonia, North Carolina**

Dear Mr. Logsdon,

AECOM North Carolina, Inc. (AECOM) is submitting this report which provides a summary of the Phase II Environmental Site Assessment (ESA) conducted at the State Line Scrap Metal property located in Gastonia, North Carolina (Site). The primary objective of the assessment was to evaluate recognized environmental conditions (RECs) identified during AECOM's December 2011 Phase I ESA conducted for the Site. The sections below provide the background and purpose of the investigation and a discussion of the methods and results.

## **Background**

The Site consists of two separate parcels of land located approximately 500 feet apart in Gastonia, Gaston County, North Carolina. The parcels occupy approximately 40.6 acres (5401 York Highway) and 8.5 acres (160 Wolf Pack Road). The parcel located at 5401 South York Highway is occupied by an active metal recycling facility, and an associated office building is located at 160 Wolf Pack Road. The parcels are currently owned by Mill Creek Management LLC. A Site Location Map is provided as Figure 1, and a Site Layout is depicted in Figure 2.

In December 2011, AECOM performed a Phase I ESA at the Site. Based on preliminary findings and site observations on December 7, 2011, a Phase II ESA was authorized and conducted concurrently with the Phase I ESA. The Phase II scope of work was designed to address areas of concern (AOCs) identified by The David J. Joseph Company (DJJ) and an AECOM representative during the December 7, 2011 site visit.

The following AOCs were identified during the Phase I ESA site reconnaissance:

- Area adjacent to the Turnings Storage Area and the Maintenance Building;
- Area adjacent to the Torch Area;
- Area adjacent to the Shear and Ferrous Scrap Metal Storage Area; and,
- Detention pond and catch vat located adjacent to the Shredder Area.

## Objectives

The primary objectives of AECOM's Phase II ESA were to screen the Site for potential subsurface contamination related to the RECs identified during AECOM's December 2011 Phase I ESA site reconnaissance. AECOM's Phase I ESA site reconnaissance identified the following REC at the Site:

- Historical operations as a scrap metal recycling facility since approximately 1990. Materials/products stored and used onsite include ferrous and non-ferrous scrap metal; scrap vehicle parts, motors, and transmissions; baled and prepared scrap; diesel fuel and other petroleum products (i.e., motor oil, used oil, hydraulic oil, etc.); processing equipment (i.e., baler, shearer, and shredder); heavy mobile equipment; and automobile shredder residue. Based on the potential leakage of petroleum hydrocarbons from onsite use of processing and heavy equipment and the presence of residual oils, polychlorinated biphenyls, heavy metals, and other constituents associated with exposed scrap, the use of the subject site as a scrap metal recycling facility represents a REC to the subject site.

## Investigative Activities

In December 2011, AECOM personnel performed soil, sediment, and groundwater sampling at the Site to preliminarily screen each of the areas of concern related to the RECs identified during the Phase I ESA. The assessment was not designed to delineate the extent of any potential impacts.

For the Phase II investigation, the Site was divided into four areas of concern (AOC). These AOCs include:

- the Turnings Area and Maintenance Building;
- the Torch Area;
- the Shear Area; and
- the Shredder Area.

## Soil Sampling Methodology

Soil borings were advanced onsite using direct-push technology (DPT). Refer to Figures 3 through 5 for the sample location maps. A background sample (BC-01) was also collected from the northern portion of the Site to evaluate background metals conditions.

Soil borings were advanced to depths of up to 10 feet below land surface (bls), and soil samples were collected from each boring at continuous five-foot intervals using Macro-Core® samplers. The

soil cores were logged for soil type and screened with a photo-ionization detector (PID). Boring logs are found in Attachment A.

A total of 33 borings were advanced and soil samples were collected from the bottom (generally 3-5 feet bls) of each boring and submitted for laboratory analysis. Based on PID screening results and visual observations, select shallow samples (0-2 feet bls) were also submitted to the laboratory for analysis. A clean pair of Nitrile gloves was used during collection of each sample to prevent cross-contamination of samples. The laboratory analytical samples were placed into appropriate laboratory provided containers and labeled with the project name, sample designation, sample collection date, sample collection time, and sampler's name, and submitted for analysis by various methods. These analytical methods included volatile organic compounds (VOCs) via United States Environmental Protection Agency (EPA) Method 8260B, semi-volatile compounds (SVOCs) via EPA Method 8270C, Resource Conservation and Recovery Act (RCRA) metals via EPA Method 6010B, lead via EPA Method 6010B, mercury via EPA Method 7471A, polychlorinated biphenyls (PCBs) via EPA Method 8082, and Oil & Grease via EPA Method 9071B.

Field sampling equipment was thoroughly decontaminated prior to use and between each sample collection point. Decontamination of equipment was performed to prevent cross-contamination between samples and to maintain a clean working environment for personnel.

### **Groundwater Sampling Methodology**

To evaluate groundwater conditions at each area, temporary 1-inch monitoring wells were installed at four locations (TMW-01, TMW-02, TMW-03, and TMW-04) in a topographically down-gradient location from each AOC. Each well was completed with 15 feet of screen. A sand pack was placed around the well screen and extended approximately two feet above the screen. An approximate 3-foot thick layer of bentonite was then placed above the sand pack. Refer to Figure 4 and Figure 5 for the sample location maps.

After installation, each temporary monitoring well was developed by pumping until the turbidity decreased and purge water was visibly clear. Prior to sampling, the static groundwater level in each well was measured using an electronic water level meter. Groundwater was encountered during the assessment at depths ranging from 28 to 38 feet bls. The water was then purged from each well using a low-flow bladder pump with a new bladder and new polyethylene tubing. Water quality measurements for pH, conductivity, temperature, oxidation-reduction potential and dissolved oxygen were collected using a YSI 556 water quality meter with a flow-through cell. Turbidity measurements were collected using a LaMont 2020 Turbidimeter. Water quality and turbidity measurements were recorded on sample collection forms included in Attachment B.

Once water quality parameters stabilized and turbidity was below 10 nephelometric turbidity units, groundwater samples were collected and transferred into laboratory prepared sample containers, labeled, and chilled on ice pending shipment via courier to Prism Laboratories in Charlotte, North Carolina. A total of four (4) groundwater samples were submitted for laboratory analysis of VOCs via EPA Method 8260B, SVOCs via EPA Method 8270C, RCRA metals via EPA Method 6010B, and PCBs via EPA Method 8082.

### **Sediment Sampling Methodology**

A decontaminated stainless-steel hand auger was used to collect sediment samples at 5 locations within various Site stormwater holding ponds as shown on Figure 4 and Figure 5. Sampling depths ranged from the 0 to 1 foot below sediment surface. Each sample was placed into laboratory

prepared sample containers, labeled, and chilled on ice pending shipment via courier to Prism Laboratories in Charlotte, North Carolina. Sediment samples were submitted for VOCs via EPA Method 8260B, SVOCs via EPA Method 8270C, RCRA metals via EPA Method 6010B, lead via EPA Method 6010B, mercury via EPA Method 7471A, PCBs via EPA Method 8082, and Oil & Grease via EPA Method 9071B.

### **Investigative Derived Waste**

Soil cuttings, decontamination water, and purge water generated during the field activities was spread on the ground surface. Efforts were made to dispose of this investigation derived waste (IDW) in the area where it originated to avoid spreading possible contamination. Other IDW including plastic boring liners and sample tubing were disposed in the Site dumpster.

### **Investigative Results**

This section summarizes the results of the Phase II activities. The results are summarized on Tables 1 through 3 and Figures 6 through 11. A copy of the laboratory analytical reports are found in Attachment C. Soil results were compared to the North Carolina Department of Environment and Natural Resources (NCDENR) Inactive Hazardous Sites Branch (IHSB) Preliminary Soil Remediation Goals (PSRG) for Protection of Groundwater (PoG) and Industrial Health (Ind.). Groundwater results were compared to the NCDENR Department of Water Quality (DWQ) 2L Standards. Finally, sediment samples were compared to the NCDENR IHSB PSRGs (PoG and Ind.) and the EPA Screening Levels (SLs).

#### **Soil Analytical Results**

Detected soil analytical results are summarized on Table 1. Refer to Figures 3, 4, and 5 for soil sample location maps and Figure 6 through Figure 11 for analytical exceedance summary maps. The investigation revealed the following:

#### **Turnings Area and Maintenance Building (SB-01 through SB-16):**

##### VOCs

Eleven VOCs: acetone; carbon disulfide; cis-1,2-dichloroethylene; ethylbenzene; methyl isobutyl ketone; toluene; 1,3,5-trimethylbenzene (1,3,5-TMB); 1,2,4-trimethylbenzene (1,2,4-TMB); 4-isopropyltoluene; m,p-xylenes; and o-xylenes were detected above laboratory reporting limits in multiple samples. However, the detected concentrations were below applicable IHSB PSRGs.

##### SVOCs

Five SVOCs were detected above laboratory reporting limits in SB-13 (0-2). These included: bis (2-ethylhexyl) phthalate; dimethyl Phthalate; fluoranthene; phenanthrene; and pyrene. However, the measured concentrations were below applicable IHSB PSRGs.

##### Metals

Six metals; arsenic, barium, chromium, lead, mercury, and selenium were detected above laboratory reporting limits in several borings. Arsenic concentrations measured in SB-12 (0-2), SB-13 (0-2), SB-14 (3-5), SB-16 (0-2), and SB-16 (3-5) exceeded both the background level measured in BC-01 (3.2 milligram per kilogram [mg/kg]) and the IHSB PSRGs. Selenium concentrations measured in SB-02 (3-5), SB-03 (3-5), SB-04 (3-5), SB-05 (3-5), SB-06 (3-5), SB-07 (3-5), SB-09

(3-5), SB-10 (3-5), SB-11 (0-2), SB-13 (0-2), SB-14 (3-5), SB-15 (3-5), and SB-16 (0-2) exceeded both the background level (6.7 mg/kg) and the IHSB PSRGs. Selenium concentrations measured in SB-01 (3-5), SB-03 (0-2), SB-08 (3-5), SB-12 (0-2), and SB-16 (3-5) were below the background level but exceeded the IHSB PSRGs.

#### PCBs

Three PCBs were detected above laboratory reporting limits. Aroclor-1248 and aroclor-1254 concentrations measured in SB-13 (0-2) exceeded applicable IHSB PSRGs.

#### Oil and Grease

Oil and Grease concentrations were detected above laboratory reporting limits in SB-08 (3-5) and SB-13 (0-2). The concentration measured in SB-13 (0-2) exceeded the Non Underground Storage Tank (UST) Petroleum Guidelines (Non-UST standard) of 250 mg/kg.

#### **Torch Area (SB-17 through SB-22):**

#### VOCs

Acetone was detected above the laboratory reporting limit in SB-17 (0-2), SB-17 (3-5), SB-19 (3-5), SB-20 (3-5), SB-21 (3-5), and SB-22 (3-5). However, the measured acetone concentrations were below the applicable IHSB PSRGs. Additionally, 4-isopropyltoluene was detected at an estimated concentration in SB-21 (3-5) below the applicable IHSB PSRGs. Several VOCs including: sec-butylbenzene; ethylbenzene; isopropylbenzene; methyl isobutyl ketone; naphthalene; n-butylbenzene; n-propylbenzene; styrene; toluene; trichlorofluoromethane; 1,3,5-TMB; 1,2,4-TMB; 4-isopropyltoluene; m,p-xylenes; and o-xylenes were detected in SB-22 (0-2) but below the IHSB PSRGs. The naphthalene concentration measured in SB-22 (0-2) exceeded the applicable IHSB PSRGs.

#### SVOCs

Two SVOCs, 2-methylnaphthalene and bis (2-ethylhexyl) phthalate, were detected above the laboratory reporting limit in SB-22 (0-2). The measured 2-methylnaphthalene concentration exceeded the applicable IHSB PSRGs.

#### Metals

Arsenic, barium, chromium, lead, mercury, selenium, and silver were detected above laboratory reporting limits. Arsenic concentrations measured from each boring exceeded the IHSB PSRGs. However, five of the eight samples contained concentrations below the background concentration of 3.2 mg/kg measured in BC-01. Arsenic concentrations measured in SB-17 (0-2), SB-17 (3-5), SB-22 (0-2) exceeded both the background concentration and the IHSB PSRGs. Selenium concentrations measured from each boring exceeded both the background concentration and the IHSB PSRGs. Finally, barium, lead, and silver concentrations measured in SB-22 (0-2) each exceeded their respective IHSB PSRGs.

#### PCBs

PCBs were detected above the laboratory reporting limits in SB-17 (0-2), SB-22 (0-2), and SB-22 (3-5). Aroclor-1248 concentrations measured in SB-17 (0-2) and SB-22 (0-2) exceeded the IHSB PSRGs. Additionally, aroclor-1016, aroclor-1254 and aroclor-1260 concentrations measured in SB-22 (0-2) exceeded applicable IHSB PSRGs.

### Oil and Grease

Oil and Grease was detected above the laboratory reporting limit in SB-17 (0-2), SB-21 (3-5), and SB-22 (0-2). Concentrations measured in SB-17 (0-2) and SB-22 (0-2) also exceeded the Non-UST standard of 250 mg/kg.

### **Shear Area (SB-23 through SB-31):**

#### VOCs

Three VOCs; acetone, tetrachloroethylene, and 1,2,4-TMB, were detected above laboratory reporting limits. Tetrachloroethene (PCE) was detected above the IHSB PSRGs in SB-30 (0-2).

#### SVOCs

Two SVOCs, butyl benzyl phthalate and bis (2-ethylhexyl) phthalate, were detected above laboratory reporting limits. However, concentrations were below the applicable standards.

#### Metals

Arsenic, barium, cadmium, chromium, lead, mercury, and selenium were each detected above laboratory reporting limits. Arsenic concentrations exceeded the IHSB PSRGs in SB-23 (0-2), SB-25 (3-5), SB-26 (3-5), SB-28 (3-5), SB-30 (0-2), and SB-31 (3-5), and selenium concentrations exceeded the IHSB PSRGs in each sample collected in the Shear Area. Selenium concentrations measured in SB-23 (0-2), SB-25 (0-2), SB-27 (3-5), SB-28 (3-5), SB-30 (3-5), and SB-31 (3-5) as well as the arsenic concentration in SB-30 (3-5) exceeded the background concentration (BC-01) in addition to the IHSB PSRGs.

#### PCBs

Aroclor-1248, aroclor-1254 and aroclor-1260 were each detected above laboratory reporting limits. Aroclor-1248 and aroclor-1254 exceeded IHSB PSRGs in SB-23 (0-2) and SB-30 (0-2).

### Oil and Grease

Oil and Grease concentrations were detected above laboratory reporting limits in SB-23 (0-2), SB-27 (3-5), SB-28 (3-5), and SB-30 (0-2). These concentrations also exceeded the Non-UST standard in SB-23 (0-2), SB-28 (3-5), and SB-30 (0-2).

### **Shredder Area:**

#### VOCs

One VOC, acetone, was detected above laboratory reporting limits in the soil samples collected at SB-32 (3-5) and SB-33 (3-5); however, the concentration was below its IHSB PSRGs.

#### SVOCs

SVOCs were not detected above laboratory reporting limits.

#### Metals

Arsenic, barium, chromium, lead, mercury, and selenium were each detected above laboratory reporting limits. Arsenic and selenium concentrations exceeded their IHSB PSRGs in SB-32 (3-5), and SB-33 (3-5). Arsenic, barium, chromium, lead, mercury, and selenium in SB-32 (3-5) and

arsenic, barium, lead, mercury, and selenium in SB-33 (3-5) each exceeded the background concentration (BC-01).

#### PCBs

PCBs were not detected above laboratory reporting limits.

#### Oil and Grease

Oil and Grease was not detected above the laboratory reporting limit.

### **Groundwater Analytical Results**

The groundwater analytical results are summarized on Table 2. Refer to Figures 4 and 5 for well locations. VOCs, SVOCs, and PCBs were not detected above laboratory reporting limits in groundwater samples collected at the Site. Barium and lead were detected in samples collected from TMW-01, TMW-02, TMW-03, and TMW-04. However, concentrations were below the 2L Standards. Selenium was detected above the 2L Standard in the initial sample collected from TMW-04 in December 2011. However, the data was qualified by the laboratory because the laboratory control sample concentration for selenium was above the control limits. As a result, DJJ elected to resample TMW-04 in January 2012. Selenium concentrations of the January 2012 sample were below laboratory detection limits. As a result, the initial selenium detection is believed to be erroneous.

### **Sediment Analytical Results**

Sediment analytical results are summarized on Table 3 and sample locations are depicted on Figures 4 and 5. Sediment concentrations were compared to EPA SLs and IHSB PSRGs (PoG and Ind.). The sediment analytical results revealed the following:

#### VOCs

Nine VOCs: acetone; carbon disulfide; methyl ethyl ketone; methyl isobutyl ketone; naphthalene; toluene; trichlorofluoromethane; 1,2,4-TMB; and m,p-xylenes, were detected above laboratory detection limits. The trichlorofluoromethane concentration measured in SED-02 exceeded the IHSB PSRGs.

#### SVOCs

Seven SVOCs: bis (2-ethylhexyl) phthalate; di-n-butyl phthalate; di-n-octyl phthalate; 3/4-methylphenol; phenanthrene; phenol; and pyrene, were each detected above laboratory detection limits. Bis (2-ethylhexyl) phthalate concentrations exceeded the EPA SL in SED-02, SED-03, SED-04, and SED-05. Phenanthrene concentrations exceeded the EPA SL in SED-03 and SED-05, and the phenol concentration measured in SED-01 exceeded the IHSB PSRGs.

#### Metals

Seven metals, arsenic, barium, cadmium, chromium, lead, mercury, and selenium, were detected above laboratory detection limits. Arsenic concentrations exceeded the IHSB PSRGs in each sample, and concentrations in SED-05 also exceeded the EPA SL. Cadmium and chromium concentrations exceeded the EPA SLs in SED-05. Lead and mercury concentrations exceeded the EPA SLs in each of the sediment samples. Selenium concentrations exceeded the IHSB PSRGs in each of the sediment samples.

### PCBs

Aroclor-1248, aroclor-1254, and aroclor-1260 were each detected above laboratory detection limits. The three PCBs exceeded at least one standard in each sample with the exception of the aroclor-1260 concentration in SED-04, which was measured below all three standards.

### Oil and Grease

Oil and grease concentrations exceeded the Non-UST standard in four of the five sediment samples. The concentration measured in SED-04 was below the standard.

## **Summary**

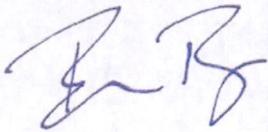
The results of the Phase II ESA at the Site indicated that VOCs, SVOCs, metals, PCBs and Oil & Grease were detected at concentrations exceeding applicable standards in soil and sediment samples. However, exceedances were not noted in groundwater. The following summarizes the results:

- Twenty VOCs and seven SVOCs were detected in soil samples collected from the Site, but only naphthalene, PCE, and 2-methylnaphthalene were detected above applicable standards.
- Eight metals were detected in soil samples. Of these arsenic, barium, lead, and selenium were detected above applicable standards in at least one sample. Arsenic and selenium were detected above applicable standards across most of the site. However, the background sample also contained arsenic and selenium concentrations in excess of applicable standards. Additional background sampling is warranted to adequately evaluate background metals concentrations.
- Four PCBs were detected in soil samples above laboratory detection limits, and concentrations also exceeded the applicable standards in at least one sample.
- Oil & grease was detected in nine soil samples and concentrations exceeded the Non-UST standard in six samples.
- Barium and lead were detected in groundwater samples collected, however, detected concentrations were below the 2L Standards.
- Nine VOCs and seven SVOCs were detected in sediment samples, but only trichlorofluoromethane, bis-(2-ethylhexyl) phthalate, phenanthrene, and phenol were detected above applicable standards.
- Seven metals were detected in sediment samples. Of these and arsenic, cadmium, chromium, lead, mercury, and selenium were detected above applicable standards.
- Three PCBs were detected in sediment samples at concentrations in excess of applicable standards.
- Oil & grease was detected in each sediment sample, and concentrations exceeded the Non UST standard in four of the five sediment samples.

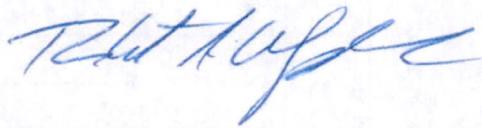
Based on the results of the Phase 2 assessment, impacts to the subsurface from hazardous substances have been identified at the Site. As a result, notification of the impacts in accordance with North Carolina Statute 130A-310.1(b) is required.

Please contact us if you have questions or concerns.

Yours sincerely,

Handwritten signature of Brian Ray in blue ink.

Brian Ray  
Senior Project Manager

Handwritten signature of Bob Wyrick in blue ink.

Bob Wyrick, P.G.  
Senior Geologist

attachments



**Table 2**  
**Groundwater Analytical Results**  
**State Line Scrap Metal**

		Sample ID:	TMW-01	TMW-02	TMW-03	TMW-04*
		Sample Type:	Grab	Grab	Grab	Grab
Analyte	2L Standard					
<b>Total Metals (mg/L)</b>						
Barium	0.70	0.061	0.092	0.13	0.22	
Lead	0.015	0.011 A, B	0.014 A, B	0.010 B	0.012 A, B	

**Notes:**

Only detected compounds listed in table.

2L Standard - North Carolina Department of Environment and Natural Resources Division  
of Water Quality (January 1, 2010 - Revised June 1, 2011)

mg/L - milligrams per liter

Samples collected on December 16, 2011

\*resampled for selenium on January 17, 2012

A - Blank value (0.0221) was greater than 1/2 the reporting limit. Sample was prepped  
by 3030C and could not be reprepped due to holding time constraints.

B - Analyte was found in the associated blank as well as in the sample

**Table 3  
Sediment Analytical Results  
State Line Scrap Metal**

Analyte	Sample ID: Sample Type:			SED-01 Grab	SED-02 Grab	SED-03 Grab	SED-04 Grab	SED-05 Grab
	USEPA SLs	IHSB PSRG PoG	IHSB PSRG (Ind.)					
<b>VOCs by 8260 (mg/kg)</b>								
Acetone	—	24	100,000	1.800	0.045	0.067	0.061	0.092
Carbon disulfide	—	3.8	740			0.0037 J	0.0036 J	0.014 J
Methyl Ethyl Ketone (2-Butanone)	—	160	28,000	0.230				0.017 J
Methyl Isobutyl Ketone	—	0.4	3,400	0.0073 J		0.010 J		0.017
Naphthalene	0.33	0.2	18			0.0077		0.0040 J
Toluene	—	5.5	820	0.0043 J				0.0051 J
Trichlorofluoromethane	—	24	680		110	0.0035 J		0.0059 J
1,2,4-Trimethylbenzene	—	6.7	52			0.0095 J		0.0053 J
Xylenes, m,p-	—	total 5.8	390			0.0040 J		0.0046 J
<b>SVOCs by 8270 (mg/kg)</b>								
Bis (2-Ethylhexyl)phthalate	0.182	7.2	120		1.900 IH	6.700 IH	3.300 IH	17.000 IH
Di-n-butyl phthalate	—	19	12,000					0.290 J
Di-n-octyl phthalate	—	38	NS					2.500 IH
3/4-Methylphenol (Cresol, m-,p-)	—	4.0/0.4	6200/620	0.390 J				
Phenanthrene	0.33	68	NS			0.370 J		0.860
Phenol	—	0.23	36,000	0.810				
Pyrene	—	220	3,400					0.630 IH
<b>Total Metals (mg/kg)</b>								
Arsenic	7.24	5.8	1.6	3.3	3.9	3.6	3.4	10
Barium	—	580	38,000	93	160	61	100	280
Cadmium	1	3	160				0.53	2.5
Chromium, Total*	52.3	360,000	100,000	28	30	30	46	110
Lead	30.2	270	800	36	55	68	110	340
Mercury	0.13	1.0	3.1	0.22	0.24	0.46	0.50	0.88
Selenium	—	2.1	1000	6.0	5.6	8.0	8.8	8.7
<b>PCBs by 8082 (mg/kg)**</b>								
Aroclor-1248	0.033	0.14	1.0	0.41	0.43 A	0.48 A	0.22 A	3.0
Aroclor-1254	0.033	0.14	1.0	0.12	0.11	0.13	0.041 J	0.60
Aroclor-1260	0.033	0.14	1.0	0.30	0.065	0.037 J	0.011 J	0.11
<b>Oil &amp; Grease (mg/kg)***</b>								
	—	—	250	300	2,300	2,000	110	780

**Notes:**

Only detected compounds listed in table.

Shaded indicates a concentration detected above applicable standard.

IHSB PSRG (Ind.) - Inactive Hazardous Sites Branch Preliminary Soil Remediation Goals - Industrial ( August 2011)

(Ind.) - Industrial

PoG - Protection of Groundwater

USEPA SLs - USEPA Region 4 Ecological Risk Sediment Screening Levels, November 2001  
(<http://www.epa.gov/region4/waste/ots/ecolbul.htm#>)

VOCs - volatile organic compounds

SVOCs - semi-volatile compounds

mg/kg - milligrams per kilogram

PCBs - polychlorinated biphenyls

A - Aroclor pattern could not be confirmed on secondary column due to matrix interference

IH - Internal Standard area below the QC limit. Compound reported with possible high bias.

J - Detected below the Reporting Limit; therefore, result is an estimated concentration

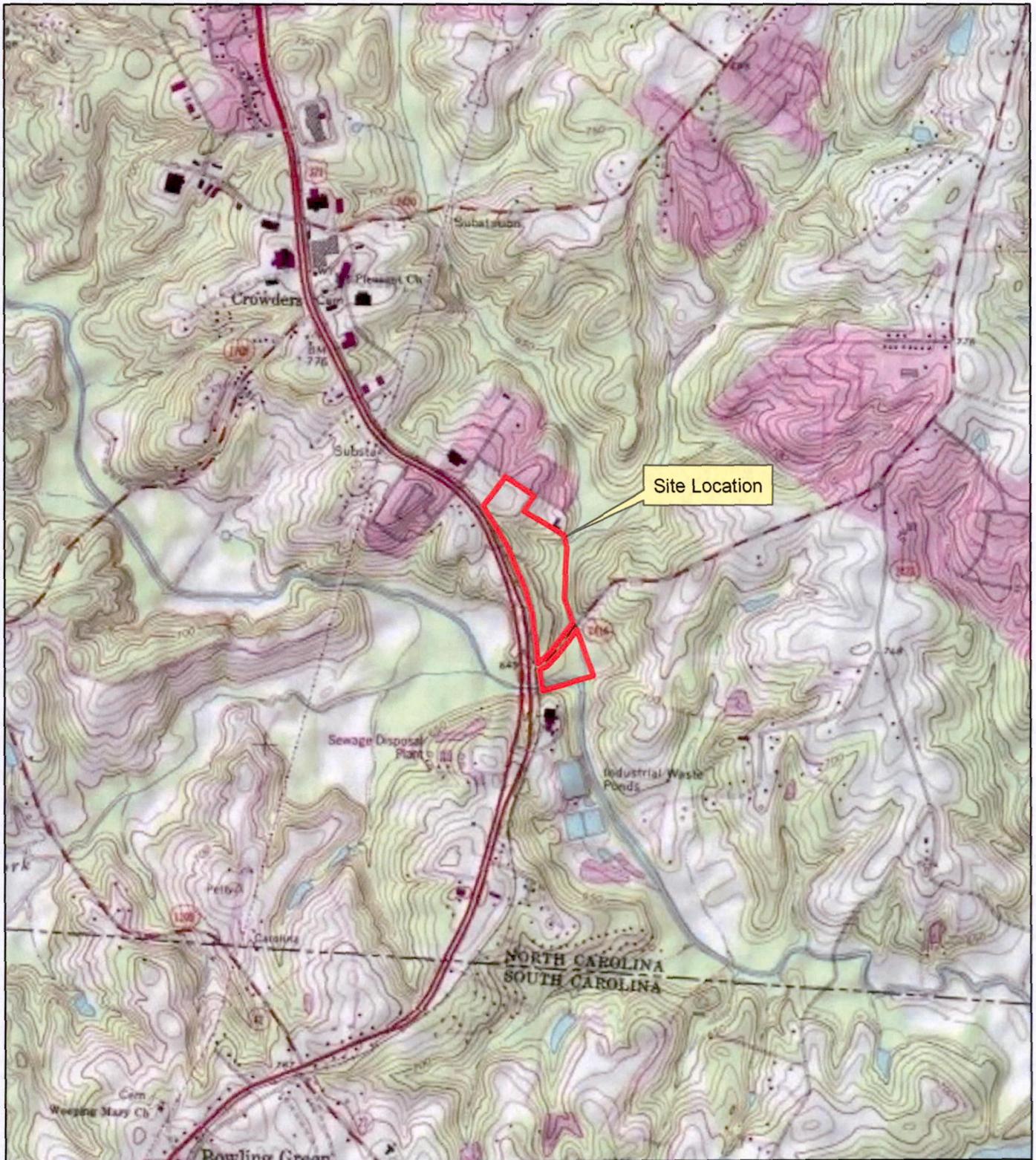
Samples collected December 14-16, 2011

\*Standards listed for chromium are for chromium (III), insoluble solids

\*\*Standards listed are for general PCBs

\*\*\*Non UST Petroleum guidelines (July 2007)

Blank cells indicate compound was not detected above the detection limit



**Site Location Plan**  
 State Line Scrap Metal  
 5401 South York Highway  
 Gastonia, North Carolina

Gastonia South, NC/SC USGS Topographic Quadrangle (1978)

0                      2,000                      4,000  
 Feet

January 20, 2012



Figure 1

**AECOM**

AECOM North Carolina, Inc.  
 8540 Colonnade Center Drive, Suite 306  
 Raleigh, NC 27615  
 Phone: (919) 872-6600  
 Fax: (919) 872-7996  
 Web: <http://www.aecom.com>

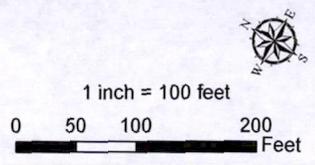
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**Legend**

- Background Soil Sample



**State Line Scrap Metal Sample Location Map**

Gastonia, North Carolina



Figure 3

January 2012

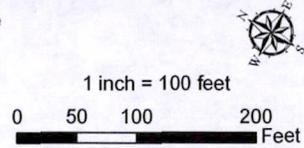


<p><b>Index Map</b></p>	<p><b>Legend</b></p> <ul style="list-style-type: none"> <li><span style="color: green;">●</span> Background Soil Sample</li> <li><span style="color: red;">●</span> Soil Sample</li> <li><span style="color: blue;">●</span> Sediment Sample</li> <li><span style="color: red;">⊕</span> Temporary Well</li> </ul>	<p><b>Note:</b></p> <ul style="list-style-type: none"> <li>- Sample locations are approximated and have not been surveyed.</li> <li>- BG-01 not submitted for laboratory analysis.</li> </ul>	<p style="text-align: center;">1 inch = 100 feet</p> <p style="text-align: center;">0 50 100 200 Feet</p>	<p><b>State Line Scrap Metal Sample Location Map</b></p> <p>Gastonia, North Carolina</p>	<p><b>AECOM</b></p> <hr/> <p>Figure 4</p> <hr/> <p>January 2012</p>
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- Legend
- Soil Sample
  - Sediment Sample
  - ⊕ Temporary Well

Note:  
- Sample locations are approximated and have not been surveyed.



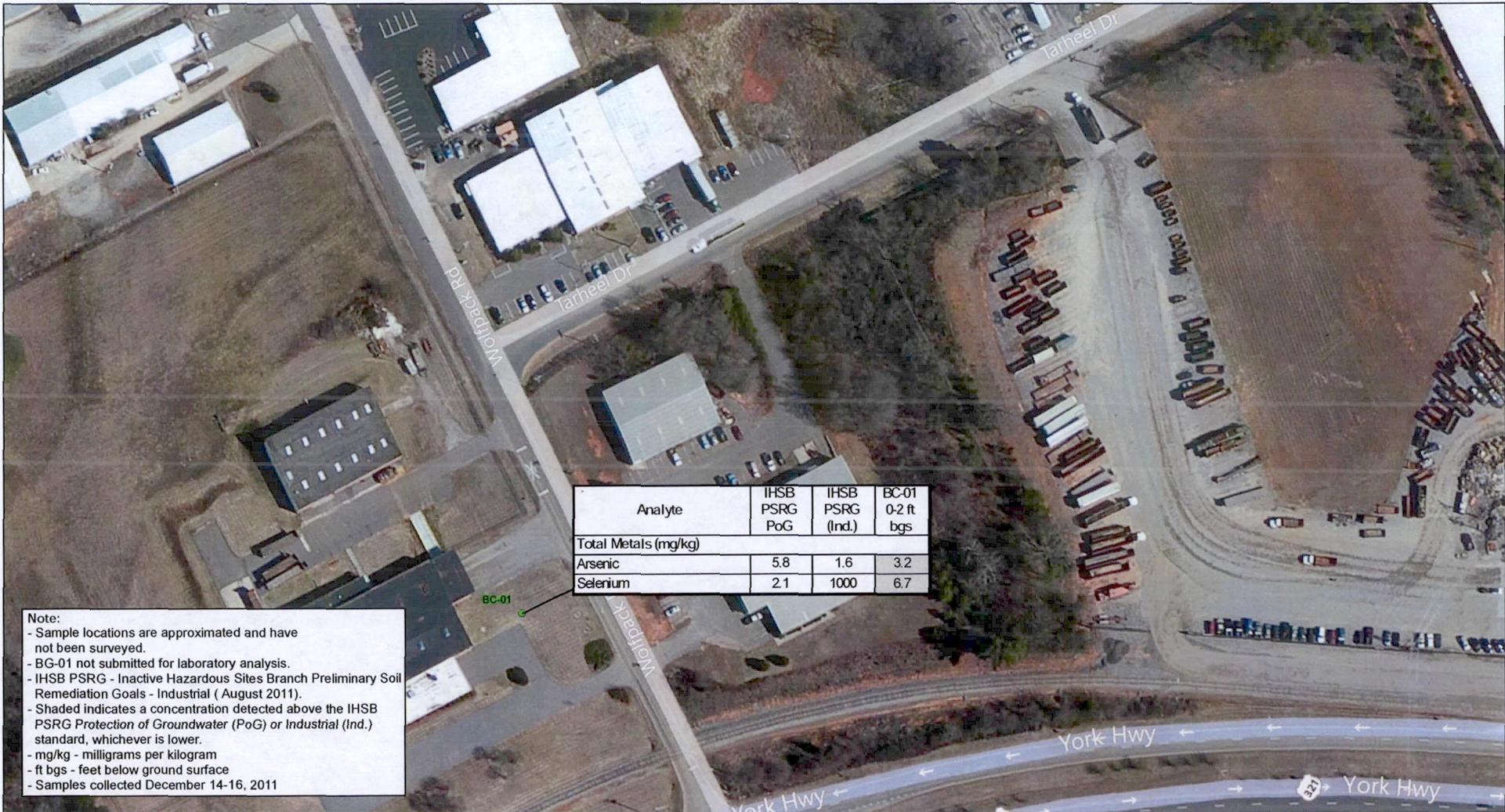
State Line Scrap Metal  
Sample Location Map

Gastonia, North Carolina

**AECOM**

Figure 5

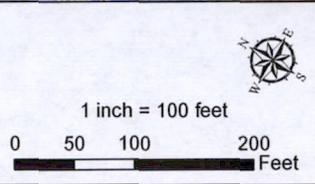
January 2012



Note:  
 - Sample locations are approximated and have not been surveyed.  
 - BG-01 not submitted for laboratory analysis.  
 - IHSB PSRG - Inactive Hazardous Sites Branch Preliminary Soil Remediation Goals - Industrial (August 2011).  
 - Shaded indicates a concentration detected above the IHSB PSRG Protection of Groundwater (PoG) or Industrial (Ind.) standard, whichever is lower.  
 - mg/kg - milligrams per kilogram  
 - ft bgs - feet below ground surface  
 - Samples collected December 14-16, 2011

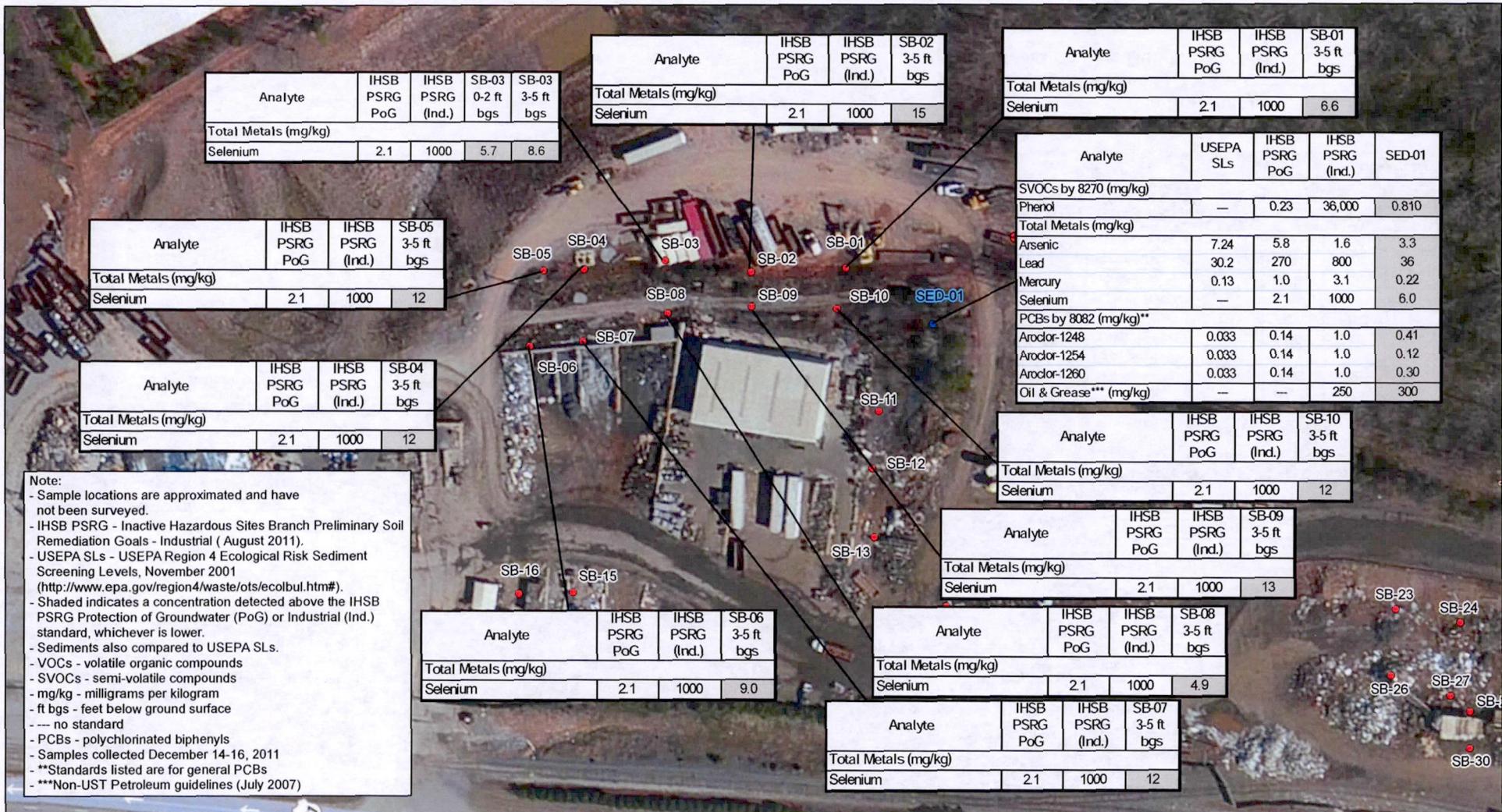


**Legend**  
 ● Background Soil Sample



State Line Scrap Metal  
 Analytical Exceedance Summary  
 Northern Portion of Site  
 Gastonia, North Carolina

Figure 6  
 January 2012



Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-03 0-2 ft bgs	SB-03 3-5 ft bgs
Total Metals (mg/kg)				
Selenium	2.1	1000	5.7	8.6

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-02 3-5 ft bgs
Total Metals (mg/kg)			
Selenium	2.1	1000	15

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-01 3-5 ft bgs
Total Metals (mg/kg)			
Selenium	2.1	1000	6.6

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-05 3-5 ft bgs
Total Metals (mg/kg)			
Selenium	2.1	1000	12

Analyte	USEPA SLs	IHSB PSRG PoG	IHSB PSRG (Ind.)	SED-01
SVOCs by 8270 (mg/kg)				
Phenol	—	0.23	36,000	0.810
Total Metals (mg/kg)				
Arsenic	7.24	5.8	1.6	3.3
Lead	30.2	270	800	36
Mercury	0.13	1.0	3.1	0.22
Selenium	—	2.1	1000	6.0
PCBs by 8082 (mg/kg)**				
Aroclor-1248	0.033	0.14	1.0	0.41
Aroclor-1254	0.033	0.14	1.0	0.12
Aroclor-1260	0.033	0.14	1.0	0.30
Oil & Grease*** (mg/kg)				
	—	—	250	300

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-04 3-5 ft bgs
Total Metals (mg/kg)			
Selenium	2.1	1000	12

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-10 3-5 ft bgs
Total Metals (mg/kg)			
Selenium	2.1	1000	12

**Note:**

- Sample locations are approximated and have not been surveyed.
- IHSB PSRG - Inactive Hazardous Sites Branch Preliminary Soil Remediation Goals - Industrial ( August 2011).
- USEPA SLs - USEPA Region 4 Ecological Risk Sediment Screening Levels, November 2001 (<http://www.epa.gov/region4/waste/ots/ecolbul.htm#>).
- Shaded indicates a concentration detected above the IHSB PSRG Protection of Groundwater (PoG) or Industrial (Ind.) standard, whichever is lower.
- Sediments also compared to USEPA SLs.
- VOCs - volatile organic compounds
- SVOCs - semi-volatile compounds
- mg/kg - milligrams per kilogram
- ft bgs - feet below ground surface
- --- no standard
- PCBs - polychlorinated biphenyls
- Samples collected December 14-16, 2011
- \*\*Standards listed are for general PCBs
- \*\*\*Non-UST Petroleum guidelines (July 2007)

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-06 3-5 ft bgs
Total Metals (mg/kg)			
Selenium	2.1	1000	9.0

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-09 3-5 ft bgs
Total Metals (mg/kg)			
Selenium	2.1	1000	13

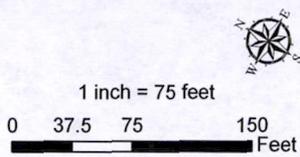
Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-08 3-5 ft bgs
Total Metals (mg/kg)			
Selenium	2.1	1000	4.9

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-07 3-5 ft bgs
Total Metals (mg/kg)			
Selenium	2.1	1000	12



**Legend**

- Soil Sample
- Sediment Sample
- ⊕ Temporary Well



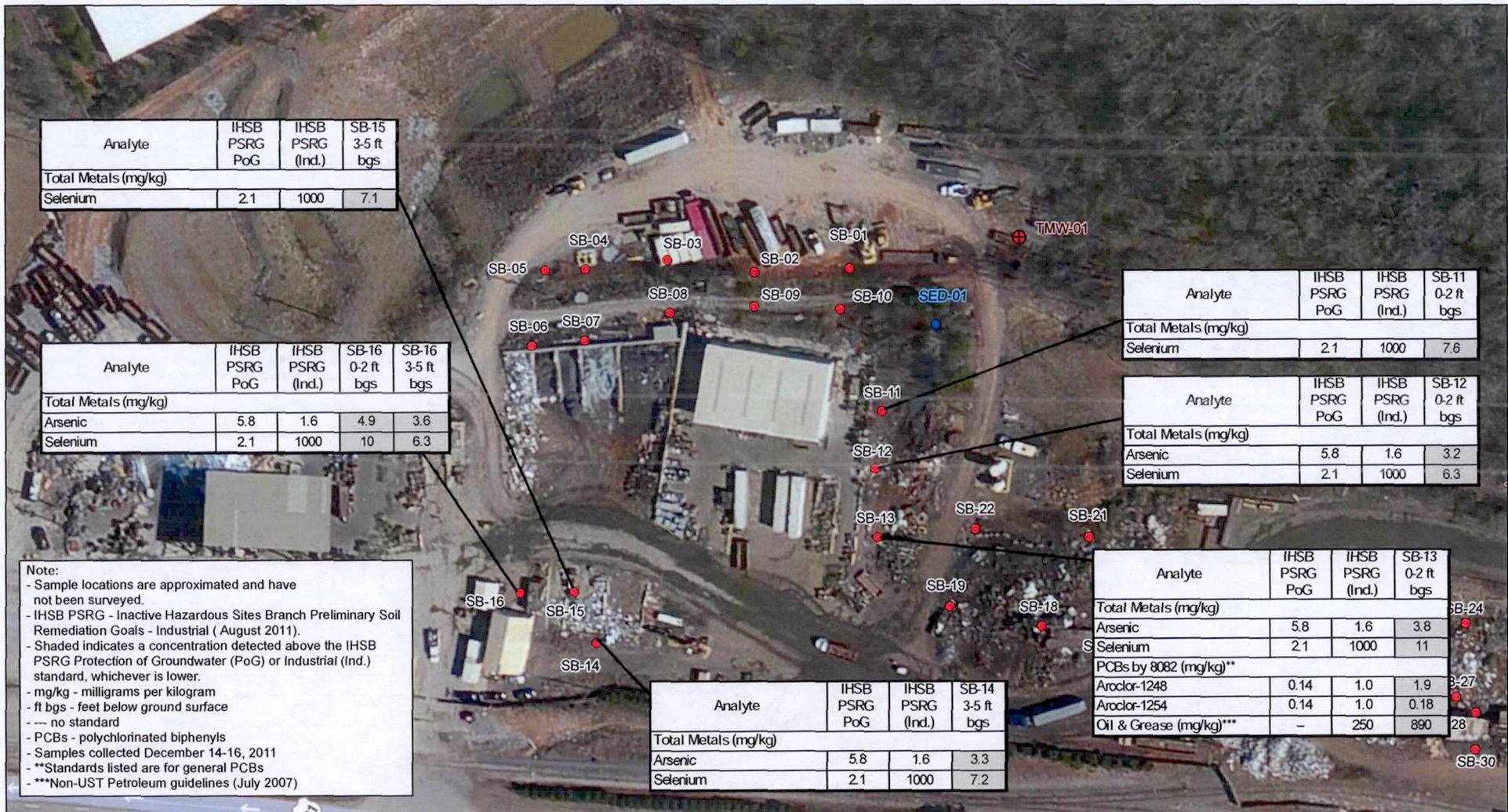
**State Line Scrap Metal Analytical Exceedance Summary Turnings Area**

Gastonia, North Carolina

**AECOM**

Figure 7

January 2012



Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-15 3-5 ft bgs
Total Metals (mg/kg)			
Selenium	2.1	1000	7.1

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-16 0-2 ft bgs	SB-16 3-5 ft bgs
Total Metals (mg/kg)				
Arsenic	5.8	1.6	4.9	3.6
Selenium	2.1	1000	10	6.3

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-11 0-2 ft bgs
Total Metals (mg/kg)			
Selenium	2.1	1000	7.6

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-12 0-2 ft bgs
Total Metals (mg/kg)			
Arsenic	5.8	1.6	3.2
Selenium	2.1	1000	6.3

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-13 0-2 ft bgs
Total Metals (mg/kg)			
Arsenic	5.8	1.6	3.8
Selenium	2.1	1000	11
PCBs by 8082 (mg/kg)**			
Aroclor-1248	0.14	1.0	1.9
Aroclor-1254	0.14	1.0	0.18
Oil & Grease (mg/kg)***	-	250	890

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-14 3-5 ft bgs
Total Metals (mg/kg)			
Arsenic	5.8	1.6	3.3
Selenium	2.1	1000	7.2

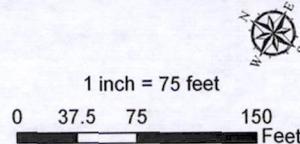
Note:

- Sample locations are approximated and have not been surveyed.
- IHSB PSRG - Inactive Hazardous Sites Branch Preliminary Soil Remediation Goals - Industrial (August 2011).
- Shaded indicates a concentration detected above the IHSB PSRG Protection of Groundwater (PoG) or Industrial (Ind.) standard, whichever is lower.
- mg/kg - milligrams per kilogram
- ft bgs - feet below ground surface
- --- no standard
- PCBs - polychlorinated biphenyls
- Samples collected December 14-16, 2011
- \*\*Standards listed are for general PCBs
- \*\*\*Non-UST Petroleum guidelines (July 2007)



Legend

- Soil Sample
- Sediment Sample
- ⊕ Temporary Well

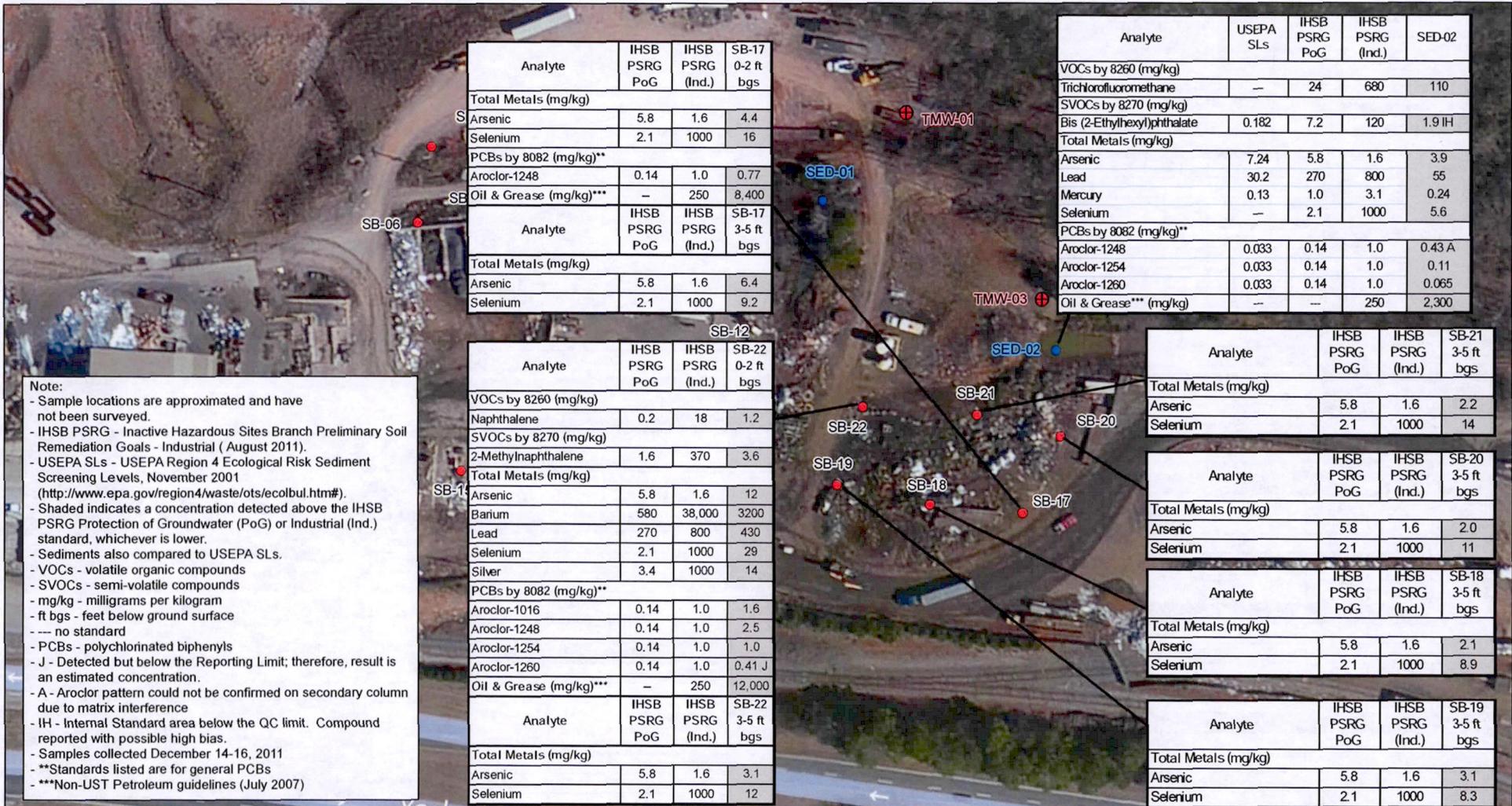


State Line Scrap Metal  
Analytical Exceedance Summary  
Turnings Area and  
Maintenance Building  
Gastonia, North Carolina

**AECOM**

Figure 8

January 2012



**Note:**

- Sample locations are approximated and have not been surveyed.
- IHSB PSRG - Inactive Hazardous Sites Branch Preliminary Soil Remediation Goals - Industrial ( August 2011).
- USEPA SLs - USEPA Region 4 Ecological Risk Sediment Screening Levels, November 2001 (<http://www.epa.gov/region4/waste/ots/ecolbul.htm#>).
- Shaded indicates a concentration detected above the IHSB PSRG Protection of Groundwater (PoG) or Industrial (Ind.) standard, whichever is lower.
- Sediments also compared to USEPA SLs.
- VOCs - volatile organic compounds
- SVOCs - semi-volatile compounds
- mg/kg - milligrams per kilogram
- ft bgs - feet below ground surface
- --- no standard
- PCBs - polychlorinated biphenyls
- J - Detected but below the Reporting Limit; therefore, result is an estimated concentration.
- A - Aroclor pattern could not be confirmed on secondary column due to matrix interference
- IH - Internal Standard area below the QC limit. Compound reported with possible high bias.
- Samples collected December 14-16, 2011
- \*\*Standards listed are for general PCBs
- \*\*\*Non-UST Petroleum guidelines (July 2007)

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-17 0-2 ft bgs
<b>Total Metals (mg/kg)</b>			
Arsenic	5.8	1.6	4.4
Selenium	2.1	1000	16
<b>PCBs by 8082 (mg/kg)**</b>			
Aroclor-1248	0.14	1.0	0.77
<b>Oil &amp; Grease (mg/kg)***</b>			
		250	8,400

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-22 0-2 ft bgs
<b>VOCs by 8260 (mg/kg)</b>			
Naphthalene	0.2	18	1.2
<b>SVOCs by 8270 (mg/kg)</b>			
2-Methylnaphthalene	1.6	370	3.6
<b>Total Metals (mg/kg)</b>			
Arsenic	5.8	1.6	12
Barium	580	38,000	3200
Lead	270	800	430
Selenium	2.1	1000	29
Silver	3.4	1000	14
<b>PCBs by 8082 (mg/kg)**</b>			
Aroclor-1016	0.14	1.0	1.6
Aroclor-1248	0.14	1.0	2.5
Aroclor-1254	0.14	1.0	1.0
Aroclor-1260	0.14	1.0	0.41 J
<b>Oil &amp; Grease (mg/kg)***</b>			
		250	12,000

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-22 3-5 ft bgs
<b>Total Metals (mg/kg)</b>			
Arsenic	5.8	1.6	3.1
Selenium	2.1	1000	12

Analyte	USEPA SLs	IHSB PSRG PoG	IHSB PSRG (Ind.)	SED-02
<b>VOCs by 8260 (mg/kg)</b>				
Trichlorofluoromethane	---	24	680	110
<b>SVOCs by 8270 (mg/kg)</b>				
Bis (2-Ethylhexyl)phthalate	0.182	7.2	120	1.9 IH
<b>Total Metals (mg/kg)</b>				
Arsenic	7.24	5.8	1.6	3.9
Lead	30.2	270	800	55
Mercury	0.13	1.0	3.1	0.24
Selenium	---	2.1	1000	5.6
<b>PCBs by 8082 (mg/kg)**</b>				
Aroclor-1248	0.033	0.14	1.0	0.43 A
Aroclor-1254	0.033	0.14	1.0	0.11
Aroclor-1260	0.033	0.14	1.0	0.065
<b>Oil &amp; Grease*** (mg/kg)</b>				
			250	2,300

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-21 3-5 ft bgs
<b>Total Metals (mg/kg)</b>			
Arsenic	5.8	1.6	2.2
Selenium	2.1	1000	14

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-20 3-5 ft bgs
<b>Total Metals (mg/kg)</b>			
Arsenic	5.8	1.6	2.0
Selenium	2.1	1000	11

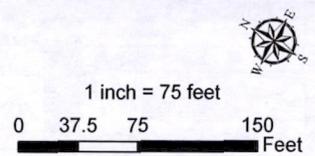
Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-18 3-5 ft bgs
<b>Total Metals (mg/kg)</b>			
Arsenic	5.8	1.6	2.1
Selenium	2.1	1000	8.9

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-19 3-5 ft bgs
<b>Total Metals (mg/kg)</b>			
Arsenic	5.8	1.6	3.1
Selenium	2.1	1000	8.3



**Legend**

- Soil Sample
- Sediment Sample
- ⊕ Temporary Well

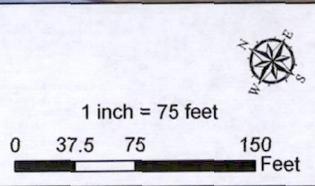
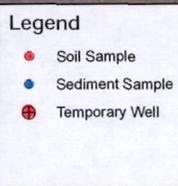
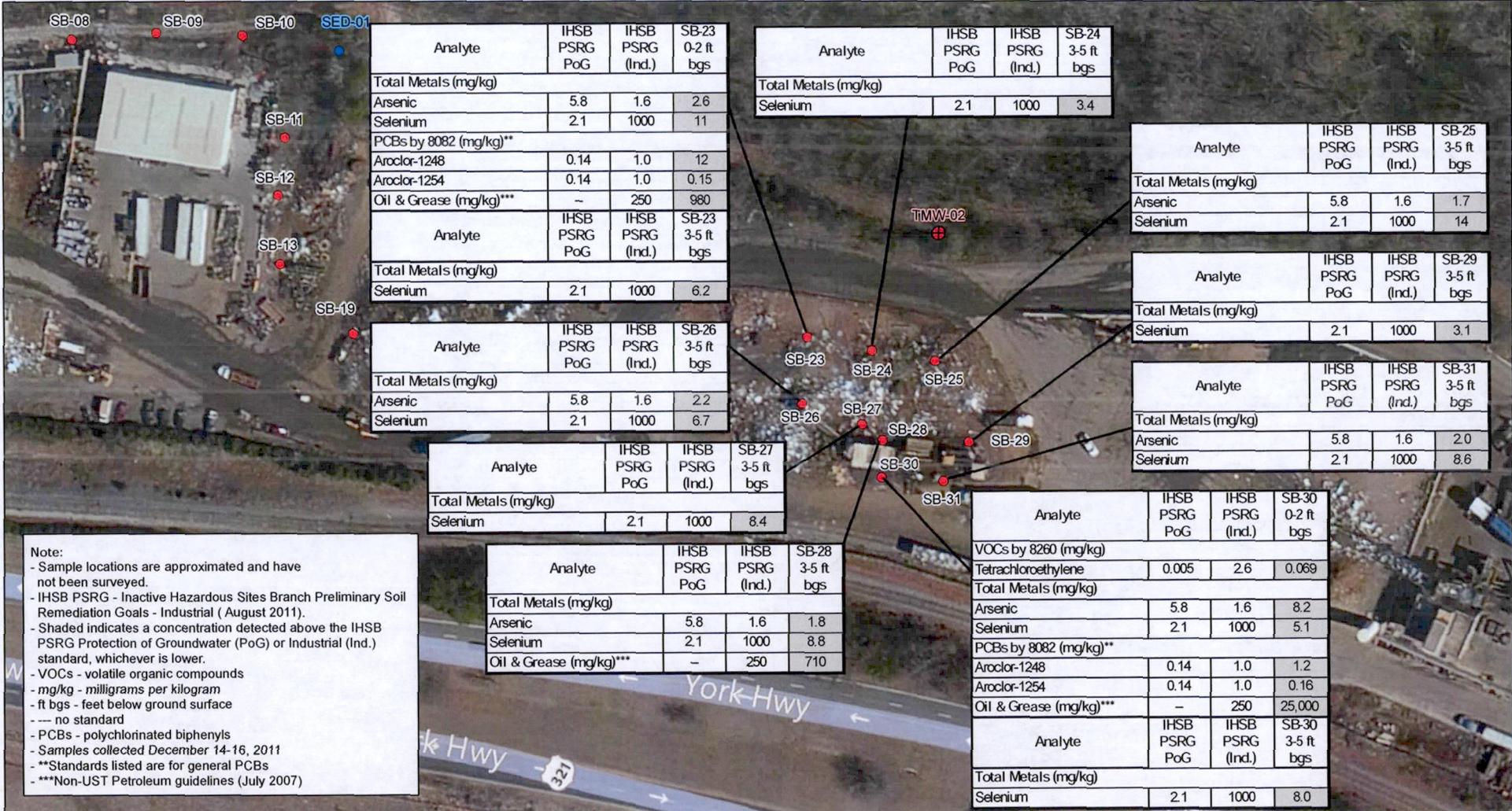


**State Line Scrap Metal Analytical Exceedance Summary Torch Area**

Gastonia, North Carolina

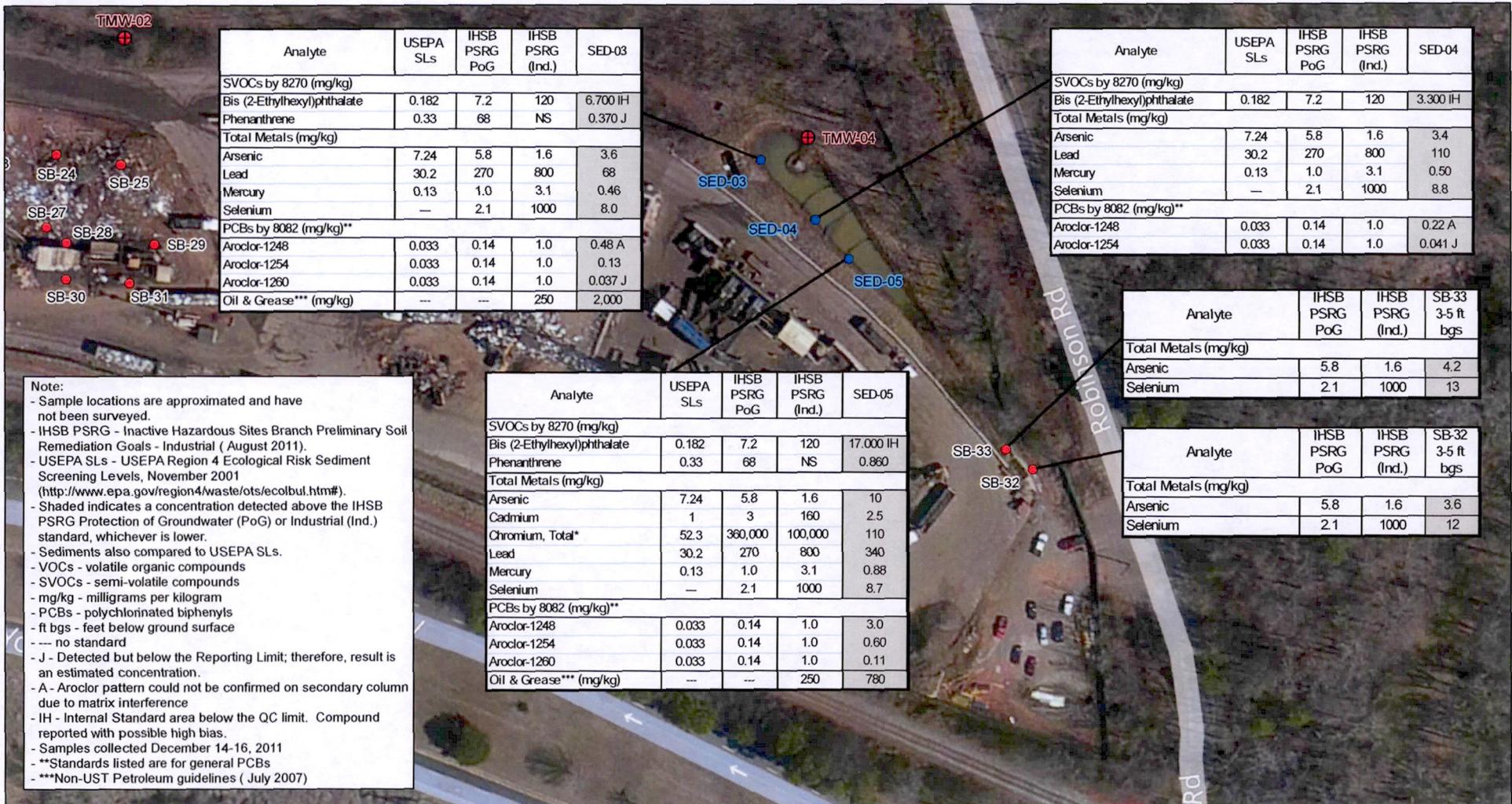
Figure 9

January 2012



State Line Scrap Metal Analytical Exceedance Summary Shear Area  
Gastonia, North Carolina

Figure 10  
January 2012



Analyte	USEPA SLs	IHSB PSRG PoG	IHSB PSRG (Ind.)	SED-03
SVOCs by 8270 (mg/kg)				
Bis (2-Ethylhexyl)phthalate	0.182	7.2	120	6.700 IH
Phenanthrene	0.33	68	NS	0.370 J
Total Metals (mg/kg)				
Arsenic	7.24	5.8	1.6	3.6
Lead	30.2	270	800	68
Mercury	0.13	1.0	3.1	0.46
Selenium	—	2.1	1000	8.0
PCBs by 8082 (mg/kg)**				
Aroclor-1248	0.033	0.14	1.0	0.48 A
Aroclor-1254	0.033	0.14	1.0	0.13
Aroclor-1260	0.033	0.14	1.0	0.037 J
Oil & Grease*** (mg/kg)	—	—	250	2,000

Analyte	USEPA SLs	IHSB PSRG PoG	IHSB PSRG (Ind.)	SED-04
SVOCs by 8270 (mg/kg)				
Bis (2-Ethylhexyl)phthalate	0.182	7.2	120	3.300 IH
Total Metals (mg/kg)				
Arsenic	7.24	5.8	1.6	3.4
Lead	30.2	270	800	110
Mercury	0.13	1.0	3.1	0.50
Selenium	—	2.1	1000	8.8
PCBs by 8082 (mg/kg)**				
Aroclor-1248	0.033	0.14	1.0	0.22 A
Aroclor-1254	0.033	0.14	1.0	0.041 J

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-33 3-5 ft bgs
Total Metals (mg/kg)			
Arsenic	5.8	1.6	4.2
Selenium	2.1	1000	13

Analyte	IHSB PSRG PoG	IHSB PSRG (Ind.)	SB-32 3-5 ft bgs
Total Metals (mg/kg)			
Arsenic	5.8	1.6	3.6
Selenium	2.1	1000	12

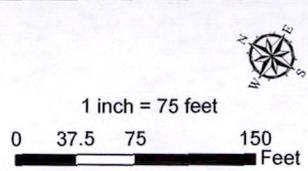
Analyte	USEPA SLs	IHSB PSRG PoG	IHSB PSRG (Ind.)	SED-05
SVOCs by 8270 (mg/kg)				
Bis (2-Ethylhexyl)phthalate	0.182	7.2	120	17.000 IH
Phenanthrene	0.33	68	NS	0.860
Total Metals (mg/kg)				
Arsenic	7.24	5.8	1.6	10
Cadmium	1	3	160	2.5
Chromium, Total*	52.3	360,000	100,000	110
Lead	30.2	270	800	340
Mercury	0.13	1.0	3.1	0.88
Selenium	—	2.1	1000	8.7
PCBs by 8082 (mg/kg)**				
Aroclor-1248	0.033	0.14	1.0	3.0
Aroclor-1254	0.033	0.14	1.0	0.60
Aroclor-1260	0.033	0.14	1.0	0.11
Oil & Grease*** (mg/kg)	—	—	250	780

**Note:**

- Sample locations are approximated and have not been surveyed.
- IHSB PSRG - Inactive Hazardous Sites Branch Preliminary Soil Remediation Goals - Industrial ( August 2011).
- USEPA SLs - USEPA Region 4 Ecological Risk Sediment Screening Levels, November 2001 (<http://www.epa.gov/region4/waste/ots/ecolbul.htm#>).
- Shaded indicates a concentration detected above the IHSB PSRG Protection of Groundwater (PoG) or Industrial (Ind.) standard, whichever is lower.
- Sediments also compared to USEPA SLs.
- VOCs - volatile organic compounds
- SVOCs - semi-volatile compounds
- mg/kg - milligrams per kilogram
- PCBs - polychlorinated biphenyls
- ft bgs - feet below ground surface
- --- no standard
- J - Detected but below the Reporting Limit; therefore, result is an estimated concentration.
- A - Aroclor pattern could not be confirmed on secondary column due to matrix interference
- IH - Internal Standard area below the QC limit. Compound reported with possible high bias.
- Samples collected December 14-16, 2011
- \*\*Standards listed are for general PCBs
- \*\*\*Non-UST Petroleum guidelines ( July 2007)



- Legend**
- Background Soil Sample
  - Soil Sample
  - Sediment Sample
  - ⊕ Temporary Well



State Line Scrap Metal Analytical Exceedance Summary Shredder Area  
Gastonia, North Carolina

**AECOM**

Figure 11

January 2012

9/6/2011 Merchants Metals

Arrived onsite @ 845 am to  
collect stormwater run of 6  
samples.

Temp is 70° F, cloudy skies,  
Rain is spotty and check  
of RO-1, RO-2, RO-3 + RO-4  
indicate no flow. Rain  
began to increase at 1030 A

calibrated Hach 2100P  
turbidity meter

<u>Standard</u>	<u>Reading</u>
9.31	9.35
72.2	72.0
480	480

collected RO-1 @ north  
culvert. water was flowing  
and clear, turbidity  
9.36 NTU. Sample @  
1040 AM

Collected RO-2 @ culvert  
near Southern Storage  
area water was flowing  
and clear. Turbidity  
reading 10.67 NTU. Sampled  
at 1052 AM.

Collected RO-3 off the  
edge of pavement near  
galvanizing building.  
Water was flowing off  
pavement and clear.  
Turbidity reading 12.11  
NTU. Sampled @ 1137 AM

Collected RO-4 from  
culvert near galvanizing  
building. Water was flowing  
and clear. Turbidity  
reading 7.68 NTU.  
Sampled at 1145 AM

left site @ 130 PM.