



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

Pat McCrory  
Governor

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Director

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Secretary

October 18, 2013

James W. Van Nortwick  
Manager of Underutilized Properties, GE Global Operations - Properties Transactions  
500 West Monroe Street - 15th Floor,  
Chicago, IL 60661

Re: **REVIEW OF PHASE II ESA & SUPPLEMENTAL DATA AND NO FURTHER WORK**  
**Bancroft Street Groundwater Solvent Impacts**  
**(Former GE Trailer Fleet Services (TFS), a.k.a. Transport International Pool, (TIP))**  
1906 Bancroft Street, Charlotte, Mecklenburg County, North Carolina  
IHSB Inventory No.: NONCD0002934

Dear Mr. James W. Van Nortwick:

Thank you for submitting your Phase II Environmental Site Assessment (ESA) received on October 26, 2012, and Supplemental Investigation Activities Letter Report received on August 27, 2013, which reports that your Site located at 1906 Bancroft Street, Charlotte, Mecklenburg County, North Carolina, has been contaminated by one or more hazardous substances. The Division of Waste Management (Division), through its Superfund Section's Inactive Hazardous Sites Branch (IHSB) has reviewed the submitted data and determined that the soil sample analytical data adequately demonstrates that Arsenic (Ar), Barium (Br), Chromium (Cr), Copper (Cu), Lead (Pb), Nickel (Ni), Selenium (Se) and Zinc (Zn) concentrations detected at the site appear to be consistent with naturally occurring background levels and/or meet both the direct contact Soil Remediation Goals (SRGs). VOCs detected in groundwater samples from the Site include chloroform, carbon tetrachloride, 1,1-dichloroethane (1,1-DCA), 1,1-dichloroethene (1,1-DCE), cis-1,2-dichloroethene (cis-1,2-DCE), tetrachloroethene (PCE) and trichloroethylene (TCE), where carbon tetrachloride, 1,1-DCE, PCE and TCE were above the NCDENR 2L Standards. Based on the distribution of 1,1-DCE, PCE and TCE observed in groundwater in upgradient wells, the absence of these constituents in Site soils, the industrial nature of the surrounding properties and the potential upgradient sources for these constituents, the Phase II ESA concluded that these constituents are indicative of an upgradient source and not likely related to previous Site activities. Further assessment and remediation of non-petroleum groundwater contamination, including but not limited to, PCE, and TCE, detected in groundwater is still required at this Site by the responsible party or property owner before the Site may be removed from the IHSB inventory of Sites.

The IHSB has reviewed the "Phase II Investigation Report", the Vapor Intrusion Assessment Report and the Supplemental Investigation Activities Letter Report completed by AMEC Environmental and Infrastructure Inc. (AMEC), documenting investigations conducted at the GE Trailer Fleet Services (TFS) Charlotte branch facility between August 2012, December 2012 and April of 2013 that revealed there are concentrations of carbon tetrachloride, 1,1-DCE, PCE and TCE in groundwater that were above the NCDENR 15A NCAC 2L groundwater quality standards (2L standards). These exceedances required us to list the property as a Site in the in the IHSB's inventory. The groundwater analytical data in these reports indicates that 2L standards exceedances may be related to an off-site source. The soil sample analytical data in the reports adequately demonstrates that metals concentrations detected at the site appear to be consistent with naturally occurring background levels and/or meet both the direct contact Soil Remediation Goals (SRGs) or Adjusted SRGs for residential use. Total chromium was the only metal detected above the chromium 2L Standard in groundwater samples collected from the Site. AMEC has attributed the detection of chromium to turbidity from the newly installed wells at the time of sampling and, after re-sampling, chromium was found to be below the laboratory Practical Quantitation Limit

(PQL). The metal compounds of concern meet the Branch's Protection of Groundwater (POG) criteria for soils, as confirmed by the groundwater analytical data samples collected from the site which met the 2L standards. VOCs detected in groundwater at the Site were not detected in Site soils. The results from sub-slab vapor samples collected at four locations beneath the at-grade floor slab in the shop showed each sub-slab vapor sample exhibited PCE at a concentration below its IHSB soil gas industrial/commercial screening level, but above its method detection limit. No other VOCs were detected in the samples collected. Based on these results, additional air sampling within Site structures is not warranted at this time as the sub-slab vapor survey did not produce results which exceeded our preliminary screening goals.

As demonstrated in the submitted documents; there is was no known chlorinated solvent usage at the Site and no chlorinated solvents were detected in Site soils. In contrast, there are confirmed off-site chlorinated solvents impacts at nearby sites and in the general area there are other industrial operations that could be potential sources for the detected contamination at the Site. AMEC's professional conclusion was that the VOCs identified in groundwater beneath the Site may be from upgradient sources, and not related to former TFS onsite operations. Additionally, as we discussed in our conference call on September 18, 2013, the Dry-Cleaning Solvent Cleanup Act Program (DSCA) is involved in investigations and delineation of a nearby chlorinated solvent plume at their site known as American Dry Cleaners (DSCA ID No. 60-0079). To date, the chlorinated solvent plume at the American Dry Cleaners site has not yet been fully delineated and could be a possible source of the contamination observed at your Site.

Based on the findings of your investigations and the presence of nearby potential off-site sources, at this time it does not appear that your prior site operations may be responsible for causing the chlorinated solvent groundwater contamination detected at the Site. The actual source of the chlorinated solvent contamination in groundwater is not known at this time. As the current property owner, we encourage you to continue additional assessment and remediation of your Site in the IHSB voluntary remediation program, however, based on the information provided at this time the IHSB does not plan to pursue requesting any additional abatement, assessment or remedial investigation at the Site from TFS. No further work will be required from TFS unless the Department later determines, based on new information or information not previously provided to the Department, that the Site has not been investigated or that the Department was provided with false or incomplete information. The Department should be immediately notified if any future assessments or investigations determine additional groundwater impacts or that groundwater impacts are related to onsite activities and/or additional soils are found to be impacted at the Site.

We understand that TFS plans to sell the property. Since the property is impacted by groundwater contamination that exceeds regulatory limits, the IHSB encourages you or any prospective purchasers to consider pursuing a Brownfields agreement for the property to limit potential cleanup liabilities and to safeguard the property for any potential redevelopment. The Division's Brownfields Program provides a mechanism for prospective developers to purchase and redevelop contaminated properties while minimizing their environmental regulatory liabilities. A potential purchaser/developer can apply for and negotiate a Brownfields agreement which defines activities needed to make the Site suitable for reuse, rather than cleaning up the Site to regulatory standards. If you would like additional information regarding the Brownfields Program, please contact Ms. Carolyn Minnich at [Carolyn.minnich@ncdenr.gov](mailto:Carolyn.minnich@ncdenr.gov) or 704-661-0330. Additional details about the Brownfields Program can be found on their website at <http://portal.ncdenr.org/web/wm/bf>.

If you have additional questions, please contact me at (704) 663-1699 or by email at [miguel.alvalle@ncdenr.gov](mailto:miguel.alvalle@ncdenr.gov).

Sincerely,



Miguel A. Alvalle, Hydrogeologist  
Department of Environment and Natural Resources  
Division of Waste Management  
Superfund Section - Inactive Hazardous Sites Branch

Electronic copy:

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