

From: [Day, Collin](#)
To: [Johnie Alexander \(johnie.alexander@concretesupplyco.com\)](mailto:johnie.alexander@concretesupplyco.com)
Cc: [Phil Rahn](#); [Ulishney, Adam](#)
Subject: RE: Thomas Concrete Issue in Albemarle
Date: Friday, September 20, 2013 10:53:57 AM
Attachments: [Dawson Plant 6 SAR Letter September 19, 2013.pdf](#)

Good Morning Johnie:

Attached please find Site Assessment Letter that the IHSB is sending Dawson Consumer Products. This letter references the groundwater contamination that was found on the Concrete Supply Company property and states that Dawson must address all offsite impacts to various media. Consequently, IHSB does not consider the Concrete Supply Company to be the party responsible for the chlorinated solvent impacts to groundwater.

Once Dawson has conducted an offsite investigation and firmly linked its property with the contamination at your facility, we should be able to delist the Concrete Supply Site from the IHSB inventory. In the intervening time, Concrete Supply does not need to take any assessment action as was previously required in our letter that was dated 5/22/13. If assessment data obtained by Dawson indicates that a contaminant source originated from the Concrete Supply Company, an investigation would, obviously, need to be conducted by your company.

Collin Day
Hydrogeologist
NC DENR Winston-Salem Regional Office
Division of Waste Management, Superfund Section-IHSB
585 Waughtown Street
Winston-Salem, NC 27107
Voice: (336) 771-5281
FAX: (336) 771-4632

From: Phil Rahn [mailto:prahn@watersedgeenv.com]
Sent: Friday, August 02, 2013 6:50 PM
To: Day, Collin
Cc: Johnie Alexander
Subject: Thomas Concrete Issue in Albemarle

Colin- I guess the conclusion I had from our last telephone call was that Thomas Concrete was not being looked at as the source of the PCE which is obviously from Former Dawson Mills. Is there any way you could send Johnie Alexander something to that effect.

Phillip Rahn
President
Waters Edge Environmental

4901 Waters Edge Drive, Suite 201

Raleigh, NC 27606

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North Carolina Department of Environment and Natural Resources

Division of Waste Management

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

September 19, 2013

**CERTIFIED MAIL 7005 1160 0004 7952 0575
RETURN RECEIPT REQUESTED**

Mr. James D. Byrnes
Dawson International Properties
8A Pleasant Street
South Natick, MA 01760-5622

Re: **NOTICE OF REGULATORY REQUIREMENTS FOR CONTAMINANT ASSESSMENT
AND CLEANUP**, Dawson Consumer Products Plant #6, 200 Highway 24/27, Albemarle, Stanly
County, NC, IHSB Site Inventory No. NONCD0002098

Dear Mr. Byrnes:

This letter is written to solicit your cooperation in monitoring, testing, analyzing and reporting on the above listed site located at the specified address. The Division of Waste Management (“Division”) has determined that there is a release, or substantial threat of a release into the environment of a hazardous substance from the facility. The facility will be referred to in the rest of our letter as the “Site.”

On January 8, 2013, Dawson International Properties (“Dawson”) was instructed to enter the Registered Environmental Consultant (“REC”) Program in order to continue with site assessment and remediation. Furthermore, Dawson was also advised in this previous correspondence that if it failed to sign a REC Administrative Agreement within sixty (60) days that the Inactive Hazardous Sites Branch (“Branch”) would undertake efforts to further prioritize the Site.

The Branch has further examined the Site in terms of the potential receptors, the magnitude of the contaminants and the lack of offsite delineation of these contaminants. Consequently, the Branch has determined that the Site may pose significant threats to the public health in terms of direct contact as the site is unsecure in regard to public access. Furthermore, the Site poses a potential vapor intrusion risk to offsite residences, some of which are located less than two-hundred feet from potential source areas. Finally, there is also the potential for impacts to active water supply wells as well as the potential for ecological impacts to surface water. The Division, therefore, considers the Site to be a high priority for assessment and is therefore, withdrawing its previous requirement that the Site enter into the REC Program.

As an example of the extent to which contaminants from the Site appear to have migrated off of the subject property, the Branch is in receipt of a new site referral from the NCDENR Mooresville Regional Office Underground Storage Tank Section (“UST”). More specifically, this referral concerns the detections in groundwater of tetrachloroethylene, trichloroethylene, and cis-1,2-dichloroethene at levels of 6900 micrograms per liter (*ug/L*), 95 *ug/L*, and 290 *ug/L*, respectively. These concentrations are above the regulatory levels established in Title 15A NCAC 2L .0202. The subject contamination was discovered during a UST removal on the property belonging to the Concrete Supply Company which is located immediately east and downgradient from the former Dawson Plant property. It should be pointed out, however, that given that the Site is located in a topographically high position relative to surrounding properties, the potential for the occurrence of radial surface and groundwater flow patterns is great. Consequently, there may be substantial contaminant mass in groundwater moving away from the Site and in multiple directions that will require an aggressive offsite assessment. This assessment will almost certainly need to include the collection of soil gas samples near residences that are in close proximity to the Site. You should be aware also that such elevated contaminant levels in an apparent groundwater recharge zone have the potential to drive contaminants deeper into the aquifer and away to such an extent that both the groundwater and the soil gas investigations may need to be expanded to a considerable distance further from the adjacent residential properties.

The Division requests that you conduct a site assessment under the supervision of the Inactive Hazardous Sites Branch (“Branch”). Within ninety (90) days of your receipt of our letter, please submit a draft Site Assessment Plan (“Plan”) that complies with the current *Inactive Hazardous Sites Branch Guidelines for Assessment and Cleanup* (www.wastenotnc.org/sfhome/ihsguide.htm). The draft Plan must be organized in sections corresponding to the following items and include:

1. Site location information including site street address, longitude and latitude, and site and surrounding property land use.
2. A summary of all management practices employed at the Site for hazardous wastes and any wastes that may have contained hazardous substances, including a list of types and amounts of waste generated (with RCRA waste codes), treatment and storage methods, and ultimate disposition of wastes; a description of the facility’s past and current RCRA status; the location and condition of any vessels currently or previously used to store any chemical products, hazardous substances or wastes; and a summary of the nature of all on-site hazardous substance releases, including one-time disposals or spills.
3. United States Geological Survey topographic maps sufficient to display topography within a one-mile radius of the Site.
4. A site survey plat (prepared and certified by a Professional Land surveyor) including scale; benchmarks; north arrow; locations of property boundaries, buildings, structures, all perennial and non-perennial surface water features, drainage ditches, dense vegetation, known and suspected spill or disposal areas, underground utilities, storage vessels, existing on-site wells; and identification of all adjacent property owners and land usage.
5. A description of local geologic and hydrogeologic conditions.

6. Inventory and map of all wells, springs, and surface-water intakes used as sources of potable water within on-half mile radius of the center of the Site. If the Site is greater than one hundred (100) acres in size, the inventory and map must cover a one-mile radius from the center of each source area.

7. Identification of environmentally sensitive areas on and adjacent to the Site including:

- State Parks
- Areas Important to Maintenance of Unique Natural Communities
- Sensitive areas Identified Under the National Estuary Program
- Designated State natural Areas
- State Seashore, Lakeshore and River Recreational Areas
- Rare Species (state and federal Threatened and Endangered)
- Sensitive Aquatic Habitat
- State Wild and Scenic Rivers
- National Seashore, Lakeshore and River Recreational Areas
- National Parks or Monuments
- Federal Designated Scenic or Wild Rivers
- Designated and Proposed Federal Wilderness and Natural Areas
- National Preserves and Forests
- Federal Land designated for the protection of Natural Ecosystems
- State-Designated Areas for Protection or Maintenance of Aquatic Life
- State Preserves and Forests
- Terrestrial Areas Utilized for Breeding by Large or Dense Aggregations of Animals
- National or State Wildlife Refuges
- Marine Sanctuaries
- National and State Historical Sites
- Areas Identified Under Coastal Protection Legislation
- Coastal Barriers or Units of a Coastal Barrier Resources System
- Spawning Areas Critical for the Maintenance of Fish/Shellfish Species within River, Lake or Coastal Tidal Waters
- Migratory Pathways and Feeding Areas Critical for Maintenance of Anadromous Fish Species within River Reaches or Areas in Lakes or Coastal Tidal Waters in which such Fish Spend Extended Periods of Times
- State Lands Designated for Wildlife or Game Management
- Wetlands

8. A list of all hazardous substances which have been used or stored at the Site, and approximate amounts and dates of use or storage as revealed by available written documentation and interviews with a representative number of former and current employees or occupants possessing relevant information.

9. Site environmental permit history, including copies of all federal, state, and local environmental permits, past and present, issued to or within the custody or control of Mr. Roby Kilby that relate to the subject property.

10. A summary of all previous and ongoing environmental investigations and environmental regulatory involvement with the Site, and copies of all associated reports and laboratory data.

11. Proposed procedures for characterizing site geologic and hydrogeologic conditions and identifying and delineating each contamination source as to each affected

environmental medium, including any plan for special assessment such as a geophysical survey.

12. Proposed methods, locations, depths of, and justification for, all sample collection points for all media sampled, including monitoring well locations and anticipated screened intervals.
13. Proposed field and laboratory procedures for quality assurance/quality control.
14. Proposed analytical parameters and analytical methods for all samples.
15. A contact name, address and telephone number for the principal consultant and laboratory, and qualifications and certifications of all consultants, laboratories and contractors expected to perform work in relation to this Plan. Any laboratory retained must currently be either certified to analyze applicable certifiable parameters under Title 15A of the North Carolina Administrative Code, Subchapter 2H, Section .0800, or be a contract laboratory under the EPA Contract Laboratory Program.
16. Equipment and personnel decontamination procedures.
17. A proposed schedule for site activities and reporting.
18. Any other information considered relevant by the remediating party.
19. [Use either: *A signed and notarized certification by a corporate official in charge of a principal business function* for businesses or *Your signed and notarized certification* for individual owners] 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."
20. 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."
21. If the Plan includes any work that would constitute the "practice of engineering" as defined by N.C.G.S. 89C, the signature and seal of a professional engineer is required.
22. If the Plan includes any work that would constitute the "public practice of geology" as defined by N.C.G.S. 89E, the signature and seal of a licensed geologist is required.

The Division will notify Dawson of any changes needed in the Plan and of the time within which the changes must be made. Dawson may not implement the Plan until it is approved in writing by the Division. Any desired modifications to the approved Plan or work schedule must be approved by the Division prior to implementation. Dawson must notify the Division no less than ten (10) days prior to any field activity.

Following completion of the site assessment, Dawson must provide a Site Assessment Report (Report) documenting implementation of the approved Plan. The Report must be organized in sections corresponding to the following items and include:

1. A narrative description of how the assessment was conducted, including a discussion of any variances from the approved Plan.
2. A description of groundwater monitoring well design and installation procedures, including well drilling methods used, completed drilling logs, "as built" drawings of all monitoring wells, well construction techniques and materials, geologic logs, and copies of all well installation permits.
3. A map, drawn to scale, showing all soil, surface water and sediment sample locations and monitoring well locations in relation to known disposal areas or other sources of contamination. Monitoring wells must be surveyed to a known benchmark. Soil sample locations must be surveyed to a known benchmark or flagged with a secure marker until after the remedial action is completed. Monitoring well locations and elevations must be surveyed by a Professional Land Surveyor.
4. A description of all laboratory quality assurance and quality control procedures followed during the remedial investigation.
5. A description of procedures used to manage drill cuttings, purge water and decontamination water.
6. A summary of site geologic conditions, including a description of soils and characteristics of the vadose zone.
7. A descriptions of site hydrogeologic conditions (if hazardous substances have been detected in groundwater), including current uses of groundwater, notable aquifer characteristics, a water table elevation contour map with groundwater flow patterns depicted, tabulated groundwater elevation data, and a description of procedures used for measuring water levels.
8. Tabulation of analytical results for all sampling (including sampling dates and soil sampling depths) and copies of all laboratory reports (including QA/QC support data referenced to specific samples).
9. Soil, groundwater, surface water and sediment contaminant delineation maps and cross sections, including scale and sampling points with contaminant concentrations.
10. A description of procedures and the results of any special assessments such as geophysical surveys, immunoassay testing (EPA SW-846 4000 series methods), soil gas surveys, or test pit excavations.
11. Copies of all field logs and notes, and, where available, color copies of site photographs.

12. A demonstration, as supported by sampling data, that the areal and vertical extent of hazardous substance contamination in each affected medium has been delineated to the satisfaction of the Division in accordance with the current version of the Division's *Inactive Hazardous Sites Branch Guidelines for Assessment and Cleanup*.

13. Any other information considered relevant by the remediating party.

14. [Use either: *A signed and notarized certification by a corporate official in charge of a principal business function* for businesses or *Your signed and notarized certification* for individual owners] 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."

15. 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."

16. If the Plan includes any work that would constitute the "practice of engineering" as defined by N.C.G.S. 89C, the signature and seal of a professional engineer is required. If the Plan includes any work that would constitute the "public practice of geology" as defined by N.C.G.S. 89E, the signature and seal of a licensed geologist is required.

The Division will notify Dawson of any changes needed in the assessment or the Report due to any hazard posed by the Site or discrepancies with the approved Site Assessment Plan, and of the time within which changes must be made. When the Division determines that the site assessment is complete, the Division will notify Dawson in writing.

Direct regulatory administration for the subject site has previously been performed by Branch personnel in the NCDENR Winston-Salem Regional Office. Due to a recent internal reorganization within the Branch, the site now falls within the newly established Branch Central Region which has resulted in the assignment of a new project manager, Mr. Adam Ulishney. Consequently, please direct all future correspondence, reporting and/or documentation to the attention of Mr. Ulishney at the following contact information:

Adam Ulishney
NC Division of Waste Management-Superfund Section
1646 Mail Service Center,
Raleigh, NC 27699

To protect public health and the environment, the Division has the authority under N.C.G.S. 130A-310.1(c) to order any responsible party to conduct such monitoring, testing, analyses and reporting as deemed reasonable and necessary to ascertain the nature and extent of any hazard posed by a Site. However, prior to issuing site assessment orders, the Division sends letters such as this to offer responsible parties the opportunity to work cooperatively with the Division.

This offer shall expire at the close of business on the 30th day following your receipt of this letter, so please notify the Division, in writing, if you intend to comply with our request. If you have any questions, concerning this assessment request, please contact Mr. Ulishney at (919) 707-8210 or at adam.ulishney@ncdenr.gov.

Sincerely,

A handwritten signature in blue ink that reads "Collin Day". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Collin Day
Hydrogeologist

cc: Upendra Tyagi, UNT Consulting & Engineering
Adam Ulishney-IHSB Central Region
IHSB Central Files