



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

Pat McCrory
Governor

John E. Skvarla, III
Secretary

September 22, 2014

Mr. James L. Joyce
K & L GATES LLP
4350 Lassiter at North Hills, Suite 300
P.O. Box 17047
Raleigh, NC 27619-7047

RE: Prime Equipment Co.
1020 North Front Street
Wilmington, New Hanover County
NONCD 0002835

Dear Mr. Joyce:

This letter is in response to your September 11, 2014 letter regarding the subject site ("Site"). At this time, the Inactive Hazardous Sites Branch ("Branch") has not made a responsible party determination for this Site or determined if the source(s) of contamination are from on and/or off property. Please refer to N.C.G.S. 130A-310.7 for information on liability of responsible parties under the Inactive Hazardous Sites Response Act.

However, if you are concerned about your client or subsequent purchasers being considered as potentially responsible parties for this Site, you may want to contact the Division of Waste Management's Brownfields Program to inquire if this Site is eligible for a Brownfields Agreement. For additional information on the Brownfields Program, please refer to their website at <http://portal.ncdenr.org/web/wm/bf>. If you have any additional questions please contact me at (910) 796-7411. For questions regarding the Brownfields Program you can contact Bruce Nicholson at (919) 707-8330.

Sincerely,

Sue Robbins, Hydrogeologist
Division of Waste Management, NC DENR

cc: Bruce Nicholson, Brownfields Program

127 Cardinal Drive Ext., Wilmington, North Carolina 27699-1646
Phone: 919-707-8200 \ Internet: <http://portal.ncdenr.org/web/wm>

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Robbins, Susanne

From: Robbins, Susanne
Sent: Thursday, September 18, 2014 7:02 AM
To: Walch, John
Subject: RE: Prime Equipment

Yes. My notes and files are on my desk, which I don't have access to at the present. I can't remember which report it was is but it was out of the UST file.

Sue Robbins, Hydrogeologist
IHSB, Superfund Section
NC Division of Waste Management
Wilmington Regional Office
(910) 796-7411

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From: Walch, John
Sent: Wednesday, September 17, 2014 4:29 PM
To: Robbins, Susanne
Subject: RE: Prime Equipment

Sue-

Was the soil sample with PCE that you reference below (GB-3) in a UST report?

From: Robbins, Susanne
Sent: Tuesday, September 16, 2014 10:50 AM
To: Walch, John
Subject: Prime Equipment

I have performed a review of the September 11, 2014 Request for Liability Clarification and the attached reports. I have also reviewed the IHSB files and UST files for the site. In response to the claim that PCE in Groundwater is from an off-site source, I have the following comments:

- PCE was detected in the soil at soil boring GB-3, 13-15 feet at a concentration of 0.0012mg/kg. This sample was near the former waste oil UST. Many of the soil samples collected at the site were not analyzed for VOCs and a full assessment of VOCs in soils has not been completed.
- Concentrations of PCE in the groundwater range from 1.60ug/L to 5.90ug/L. Only one sampling location, TMW-A was non-detect. The highest concentrations were found in samples TMW-D (5.9ug/L) and TMW-2 (4.5ug/L) which are located near to the service shop/repair portion of the on-site building. Also note that the upgradient sampling location, MW-1, is also located near this area as well as the former wash area.
- The horizontal assessment for PCE in groundwater has not been completed and no data for any off-site sources has been provided. A vertical assessment for PCE has not been performed. It is likely, based on the small size of the property and extent of contamination across the site, that contamination is off-site. Whether the source of the contamination is from the site where machine service and repairs occurred or another off-site source cannot be determined until a full assessment has been performed.

Sue Robbins, Hydrogeologist
IHSB, Superfund Section
NC Division of Waste Management
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