

**From:** [Corbitt, Chris L.](#)  
**To:** [Macdonald, Janet K](#)  
**Cc:** [McColl Jr., K. Allen](#); [John Pike \(john.pike@goldsboromilling.com\)](#) ([john.pike@goldsboromilling.com](mailto:john.pike@goldsboromilling.com))  
**Subject:** Response Letter to REC Audit for Goldsboro Milling  
**Date:** Thursday, November 20, 2014 9:27:59 AM  
**Attachments:** Response Letter to REC Audit.pdf

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Janet,

Attached is Terracon's response letter for the REC audit of the RI Work Plan for Goldsboro Milling. Please let me know if you need anything else.

Thanks,  
Chris

**Christopher L. Corbitt, PG**  
**Senior Project Manager | Environmental Services**  
**Terracon Consultants, Inc**  
2020 Starita Rd. Suite E | Charlotte, NC 28206  
P 704-509-1777 | F 704-509-1888 | M 704-301-3089  
[clcorbitt@terracon.com](mailto:clcorbitt@terracon.com) | [www.terracon.com](http://www.terracon.com)

Terracon provides environmental, facilities, geotechnical, and materials consulting engineering services delivered with responsiveness, resourcefulness, and reliability.

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*Private and confidential as detailed here ([www.terracon.com/disclaimer](http://www.terracon.com/disclaimer)). If you cannot access hyperlink, please e-mail sender.*

November 19, 2014

Ms. Janet Macdonald  
Inactive Hazardous Sites Branch - REC Program  
NCDENR - Division of Waste Management  
1646 Mail Service Center  
Raleigh, North Carolina 27699-1646

**Re: Response Letter to REC Audit of Goldsboro Milling Work Plan**  
Goldsboro Milling Company, Mill #1 Property  
938 Millers Chapel Road  
Goldsboro, Wayne County, North Carolina  
Site ID: NONCD0002891

Dear Ms. Macdonald:

In accordance with the REC audit of the Remedial Investigation (RI) Work Plan for the Goldsboro Milling Company, Mill #1 Property, Terracon Consultants, Inc. (Terracon) appreciates the opportunity to submit this response letter to the REC Program on behalf of Goldsboro Milling Company.

At the time of completion of the RI Work Plan, dated September 24, 2013, analytical data (highest concentrations in groundwater) indicated a former fueling area with underground petroleum storage tanks (USTs) as the likely potential source area for the chlorinated compounds; however, the USTs have only stored petroleum products. Terracon also suspected the apparently up-gradient feed laboratory but chlorinated compounds are reportedly not used in the procedures at the lab. Since the submission of the RI Work Plan, Terracon has conducted soil sampling at the "sampling gallows" structure which is located between the former UST basin and the feed laboratory and has detected chlorinated compounds in the shallow soils. Terracon will also be evaluating soils near the feed laboratory since it remains a suspected source area.

Terracon has attached Exhibits 1 through 7 as scaled map representations of the requested information within the REC audit letter. These exhibits depict the site and surrounding property usage, receptor information extended to one-half mile from the source area, sampling locations for soil and groundwater, and the estimated extent of constituents of concern in soils and groundwater. Please confirm that we have supplied the necessary information for the audit.

Sincerely,

**Terracon Consultants, Inc.**

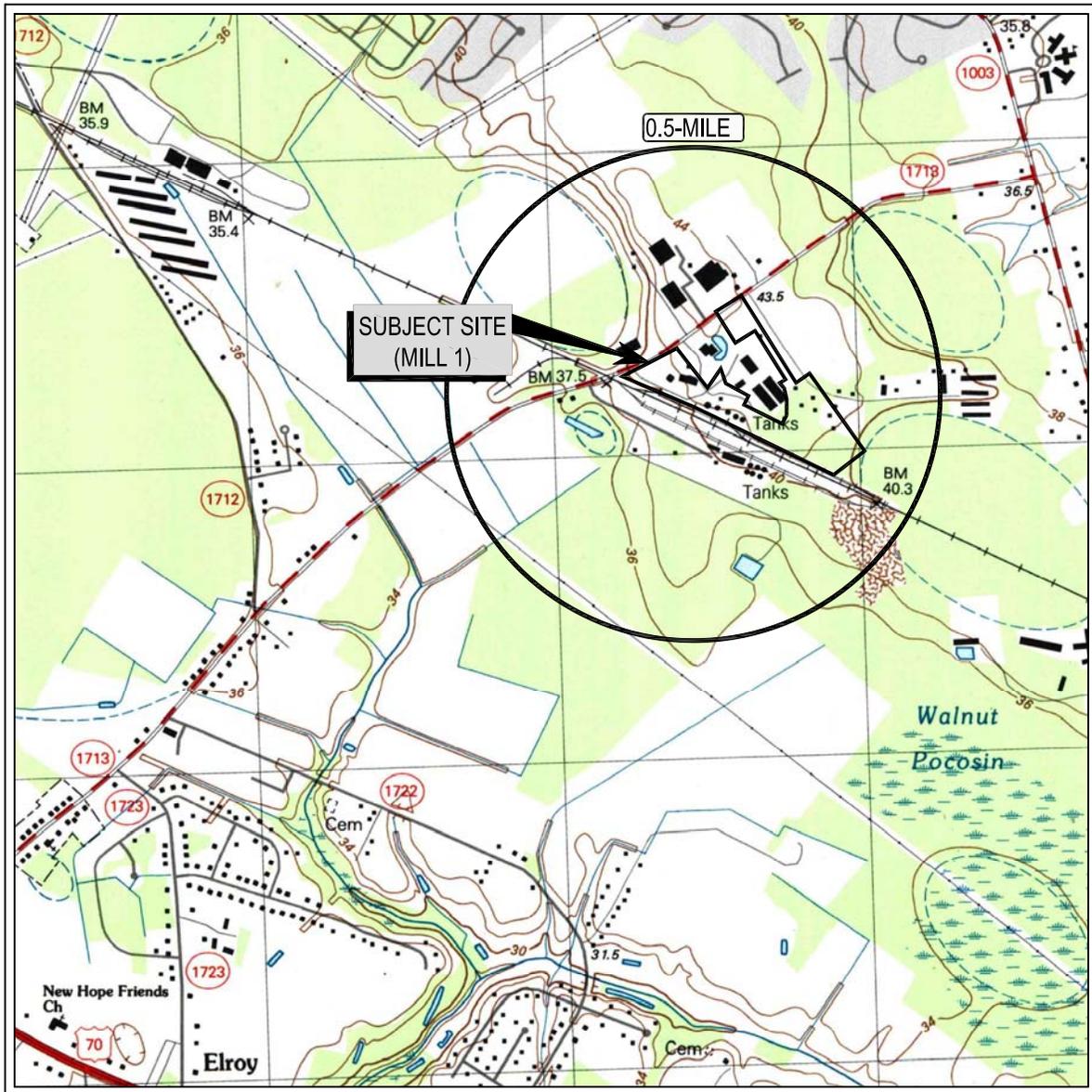


Christopher L. Corbitt, PG, RSM  
Senior Project Manager

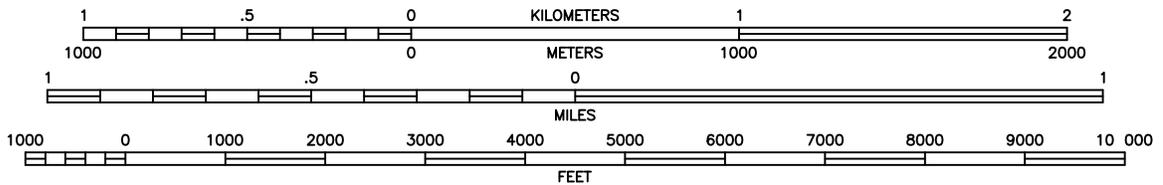
Cc: Mr. John Pike, Goldsboro Milling Company  
Mr. Allen McColl, Terracon

Terracon Consultants, Inc. 2020-E Starita Road Charlotte, North Carolina 28206  
P [704] 509 1777 F [704] 509 1888 terracon.com





SCALE 1:24 000



CONTOUR INTERVAL 5 FEET  
 NATIONAL GEODETIC VERTICAL DATUM OF 1929  
 TOPO LINES REPRESENT 5-FOOT CONTOURS

QUADRANGLE  
 SOUTHEAST GOLDSBORO, NC  
 1998  
 7.5 MINUTE SERIES (TOPOGRAPHIC)



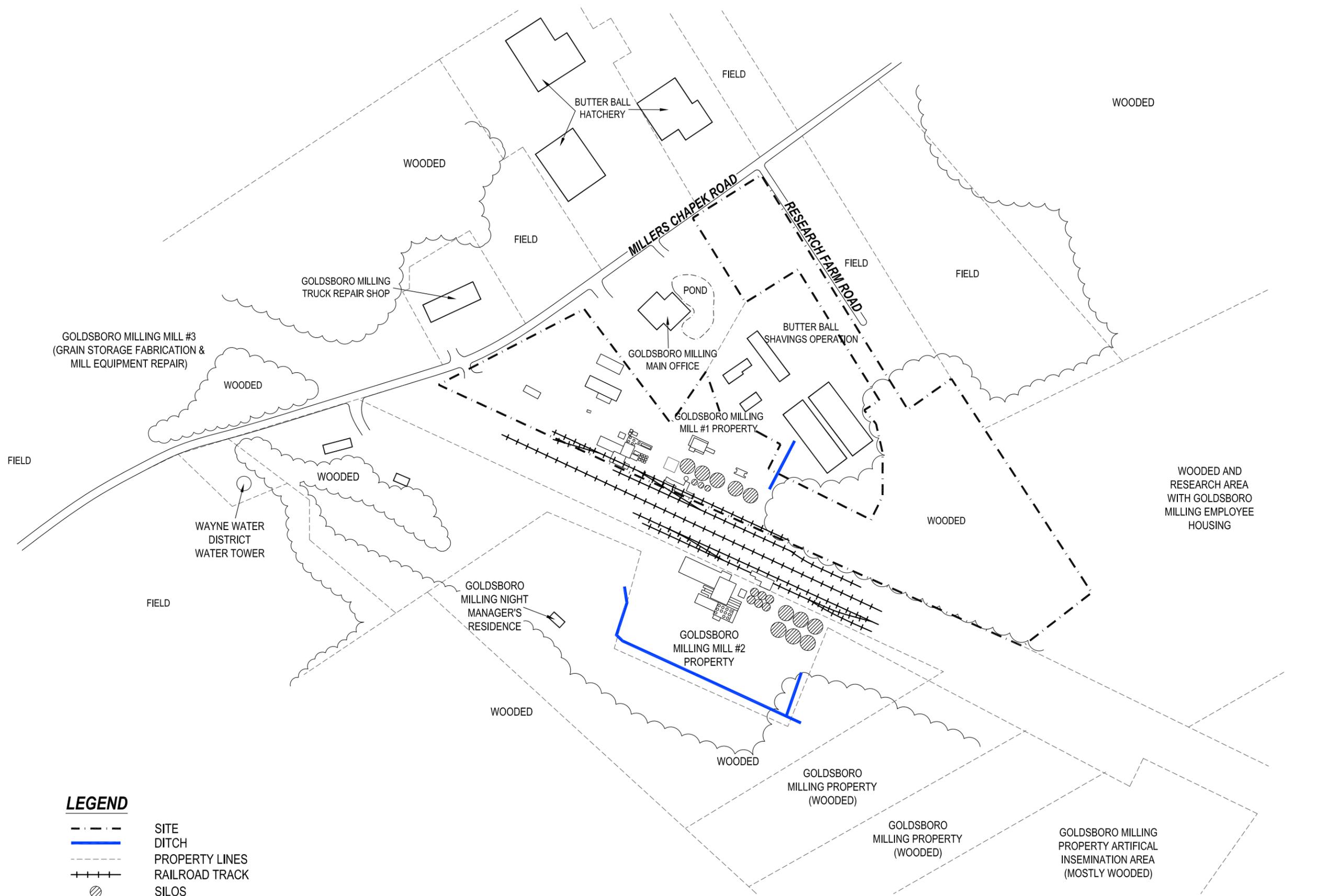
Project Mng:	KAM	Project No.	72147025
Drawn By:	RLW	Scale:	AS SHOWN
Checked By:	MRF/KAM	File No.	WP72147025-1
Approved By:	CB	Date:	NOV. 2014

**Terracon**  
 Consulting Engineers and Scientists

314 Beacon Drive Winterville, NC 28590  
 (252) 353-1600 (252) 353-0002

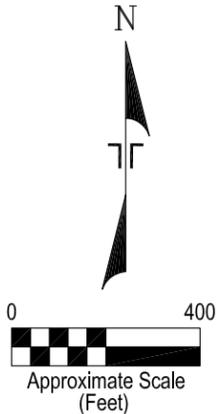
TOPOGRAPHIC VICINITY MAP  
 WORK PLAN  
 GOLDSBORO MILLING COMPANY (MILL 1)  
 938 MILLERS CHAPEL ROAD  
 GOLDSBORO, NC

EXHIBIT  
 1



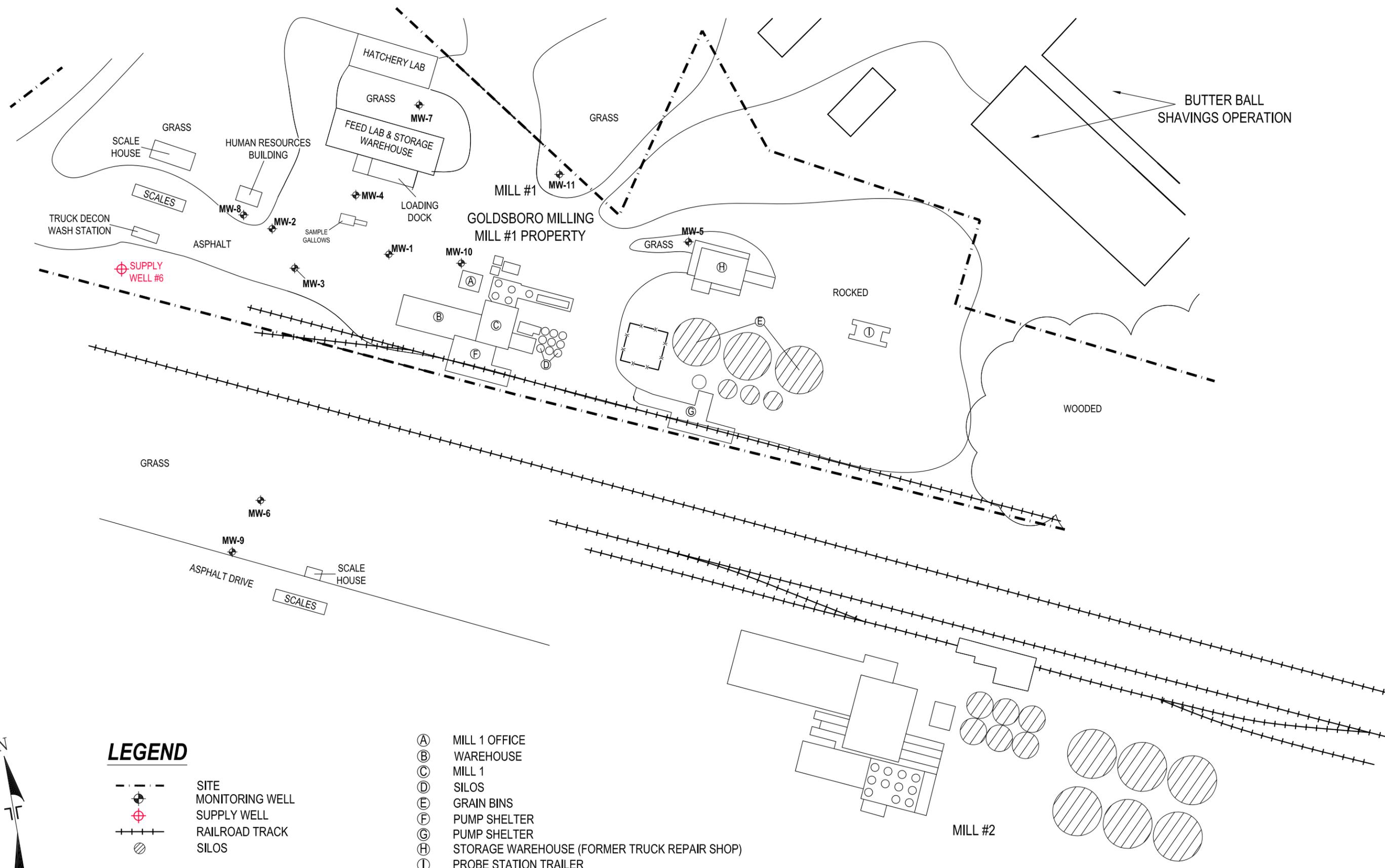
**LEGEND**

- - - - - SITE
- DITCH
- - - - - PROPERTY LINES
- + + + + + RAILROAD TRACK
- ⊙ SILOS



THIS DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Project Mngr: KAM	Project No. 72147025		<b>SITE DIAGRAM</b> WORK PLAN GOLDSBORO MILLING COMPANY (MILL 1) 938 MILLERS CHAPEL ROAD GOLDSBORO, NC	<b>EXHIBIT</b>  2
Drawn By: RLW	Scale: AS SHOWN			
Checked By: KAM/MRF	File No. WP72147025-2			
Approved By: KAM	Date: NOV. 2014			
314 Beacon Drive Winterville, NC 28590 (252) 353-1600 (252) 352-0002				



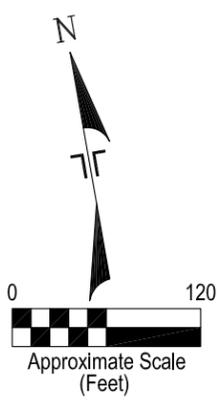
BUTTER BALL SHAVINGS OPERATION

GOLDSBORO MILLING  
MILL #1 PROPERTY

**LEGEND**

- SITE
- MONITORING WELL
- SUPPLY WELL
- RAILROAD TRACK
- SILOS

- (A) MILL 1 OFFICE
- (B) WAREHOUSE
- (C) MILL 1
- (D) SILOS
- (E) GRAIN BINS
- (F) PUMP SHELTER
- (G) PUMP SHELTER
- (H) STORAGE WAREHOUSE (FORMER TRUCK REPAIR SHOP)
- (I) PROBE STATION TRAILER



THIS DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

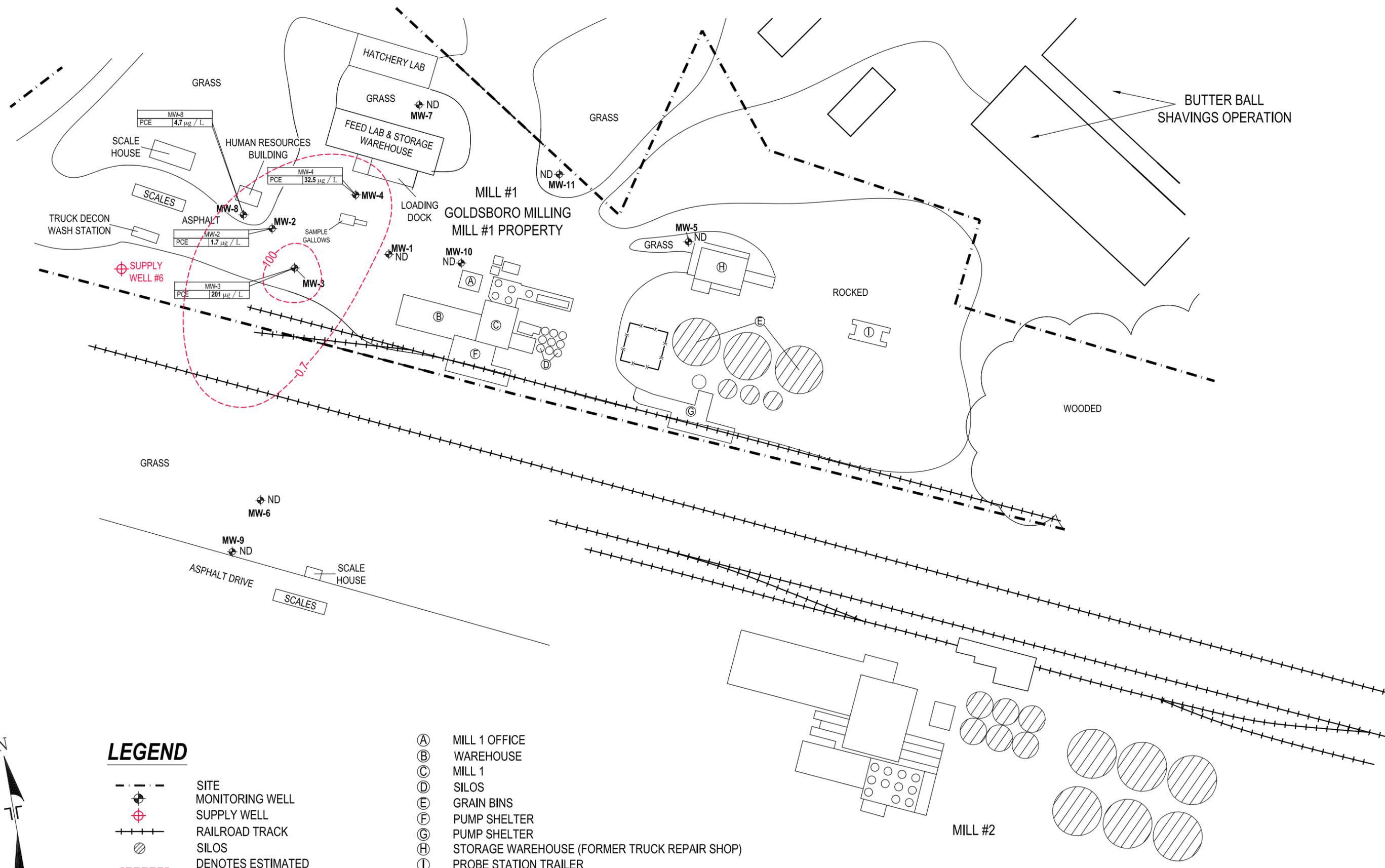
Project Mngr:	KAM	Project No.:	72147025
Drawn By:	RLW	Scale:	AS SHOWN
Checked By:	KAM/MRF	File No.:	WP72147025-3
Approved By:	KAM	Date:	NOV. 2014

**Terracon**  
Consulting Engineers and Scientists

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(252) 353-1600 (252) 352-0002

<b>MONITORING WELL LOCATION MAP</b>	
WORK PLAN	
GOLDSBORO MILLING COMPANY (MILL 1)	
938 MILLERS CHAPEL ROAD	
GOLDSBORO, NC	

EXHIBIT
3



BUTTER BALL SHAVINGS OPERATION

MILL #1  
GOLDSBORO MILLING  
MILL #1 PROPERTY

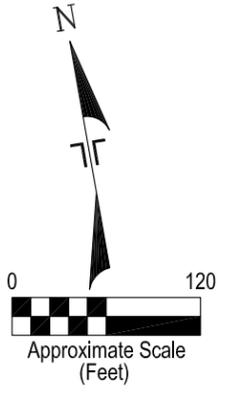
MILL #2

**LEGEND**

- SITE MONITORING WELL
- SUPPLY WELL
- RAILROAD TRACK
- SILOS
- DENOTES ESTIMATED CONTAMINATION CONTOUR (VALUES GIVEN IN µg/L)
- ND NON DETECT

- (A) MILL 1 OFFICE
- (B) WAREHOUSE
- (C) MILL 1
- (D) SILOS
- (E) GRAIN BINS
- (F) PUMP SHELTER
- (G) PUMP SHELTER
- (H) STORAGE WAREHOUSE (FORMER TRUCK REPAIR SHOP)
- (I) PROBE STATION TRAILER

NOTE: VALUES ABOVE NCDENR 2L GROUNDWATER STANDARDS ARE IN BOLD.



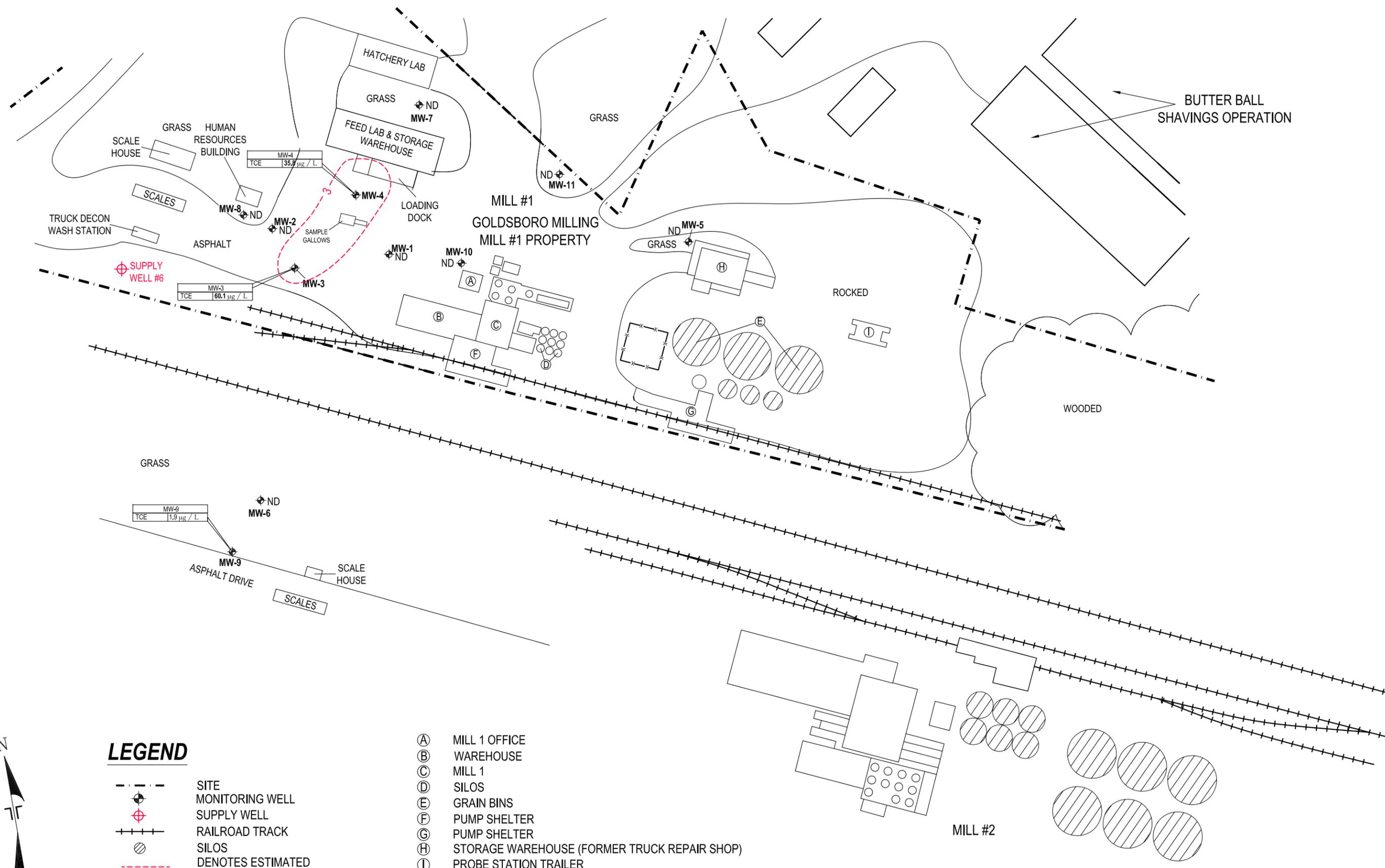
THIS DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Project Mngr:	KAM	Project No.:	72147025
Drawn By:	RLW	Scale:	AS SHOWN
Checked By:	KAM/MRF	File No.:	WP72147025-4
Approved By:	KAM	Date:	NOV. 2014

**Terracon**  
Consulting Engineers and Scientists

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(252) 353-1600 (252) 352-0002

<b>PCE CONCENTRATION MAP</b>	
WORK PLAN	
GOLDSBORO MILLING COMPANY (MILL 1)	
938 MILLERS CHAPEL ROAD	
GOLDSBORO, NC	

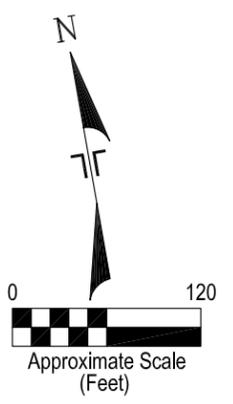


**LEGEND**

- SITE
- MONITORING WELL
- SUPPLY WELL
- RAILROAD TRACK
- SILOS
- DENOTES ESTIMATED CONTAMINATION CONTOUR (VALUES GIVEN IN µg/L)
- ND NON DETECT

- (A) MILL 1 OFFICE
- (B) WAREHOUSE
- (C) MILL 1
- (D) SILOS
- (E) GRAIN BINS
- (F) PUMP SHELTER
- (G) PUMP SHELTER
- (H) STORAGE WAREHOUSE (FORMER TRUCK REPAIR SHOP)
- (I) PROBE STATION TRAILER

NOTE: VALUES ABOVE NCDENR 2L GROUNDWATER STANDARDS ARE IN BOLD.



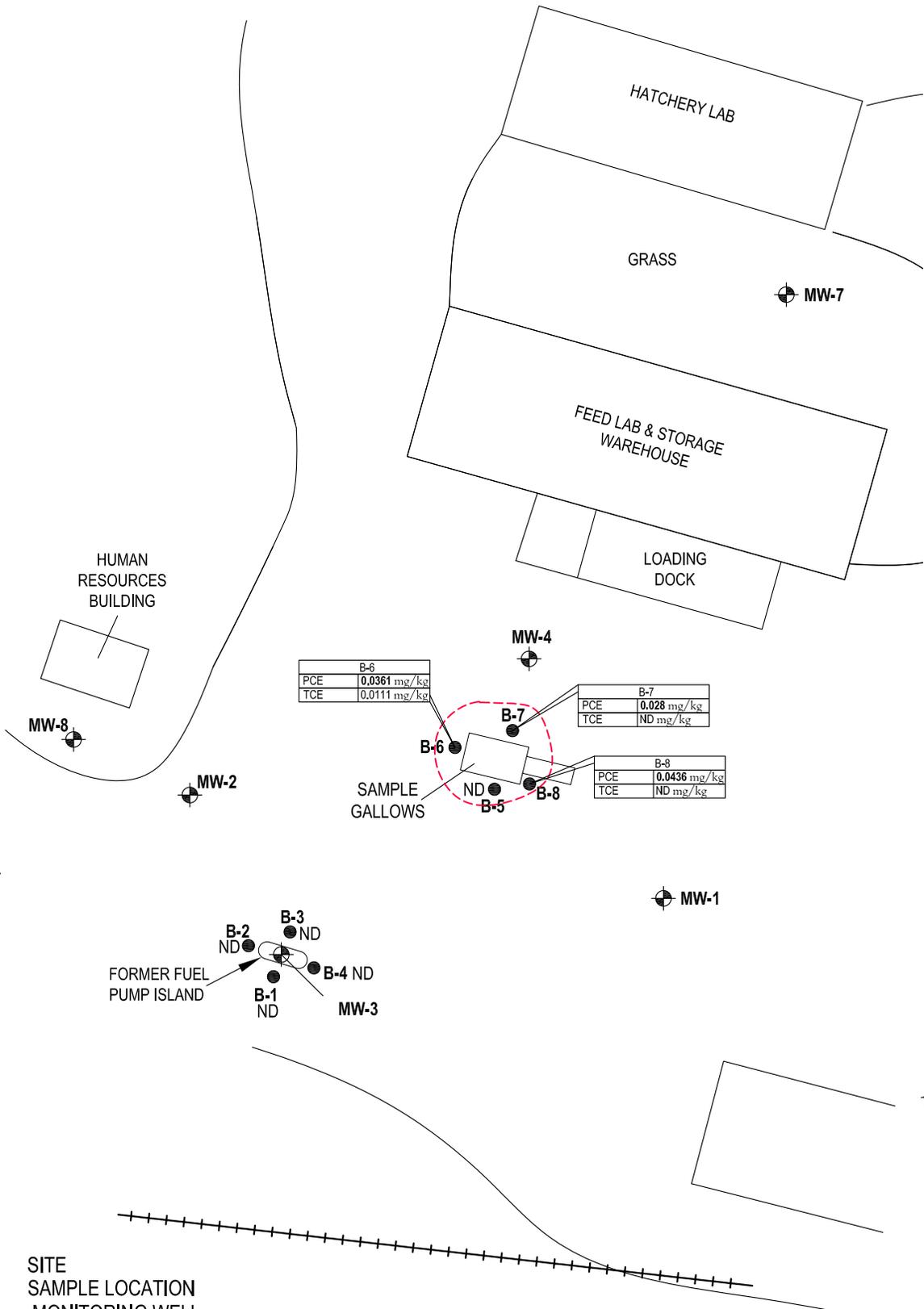
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Drawn By:	RLW	Scale:	AS SHOWN
Checked By:	KAM/MRF	File No.:	WP72147025-5
Approved By:	KAM	Date:	NOV. 2014

**Terracon**  
Consulting Engineers and Scientists

314 Beacon Drive Winterville, NC 28590  
(252) 353-1600 (252) 352-0002

<b>TCE CONCENTRATION MAP</b>	
WORK PLAN	
GOLDSBORO MILLING COMPANY (MILL 1)	
938 MILLERS CHAPEL ROAD	
GOLDSBORO, NC	

THIS DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES



B-6	
PCE	<b>0.0361</b> mg/kg
TCE	0.0111 mg/kg

B-7	
PCE	<b>0.028</b> mg/kg
TCE	ND mg/kg

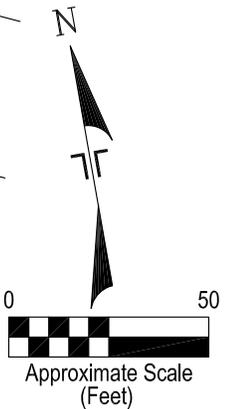
B-8	
PCE	<b>0.0436</b> mg/kg
TCE	ND mg/kg

**LEGEND**

- - - - - SITE
- SAMPLE LOCATION
- ⊕ MONITORING WELL
- + + + + + RAILROAD TRACK
- - - - - SOIL CONTAMINATION AREA
- ND NON DETECT

SITE  
 SAMPLE LOCATION  
 MONITORING WELL  
 RAILROAD TRACK  
 SOIL CONTAMINATION AREA  
 ND NON DETECT

NOTE: VALUES ABOVE NCDENR  
 PRELIMINARY SOIL REMEDIATION  
 GOALS (PSRGs) ARE IN BOLD.



THIS DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

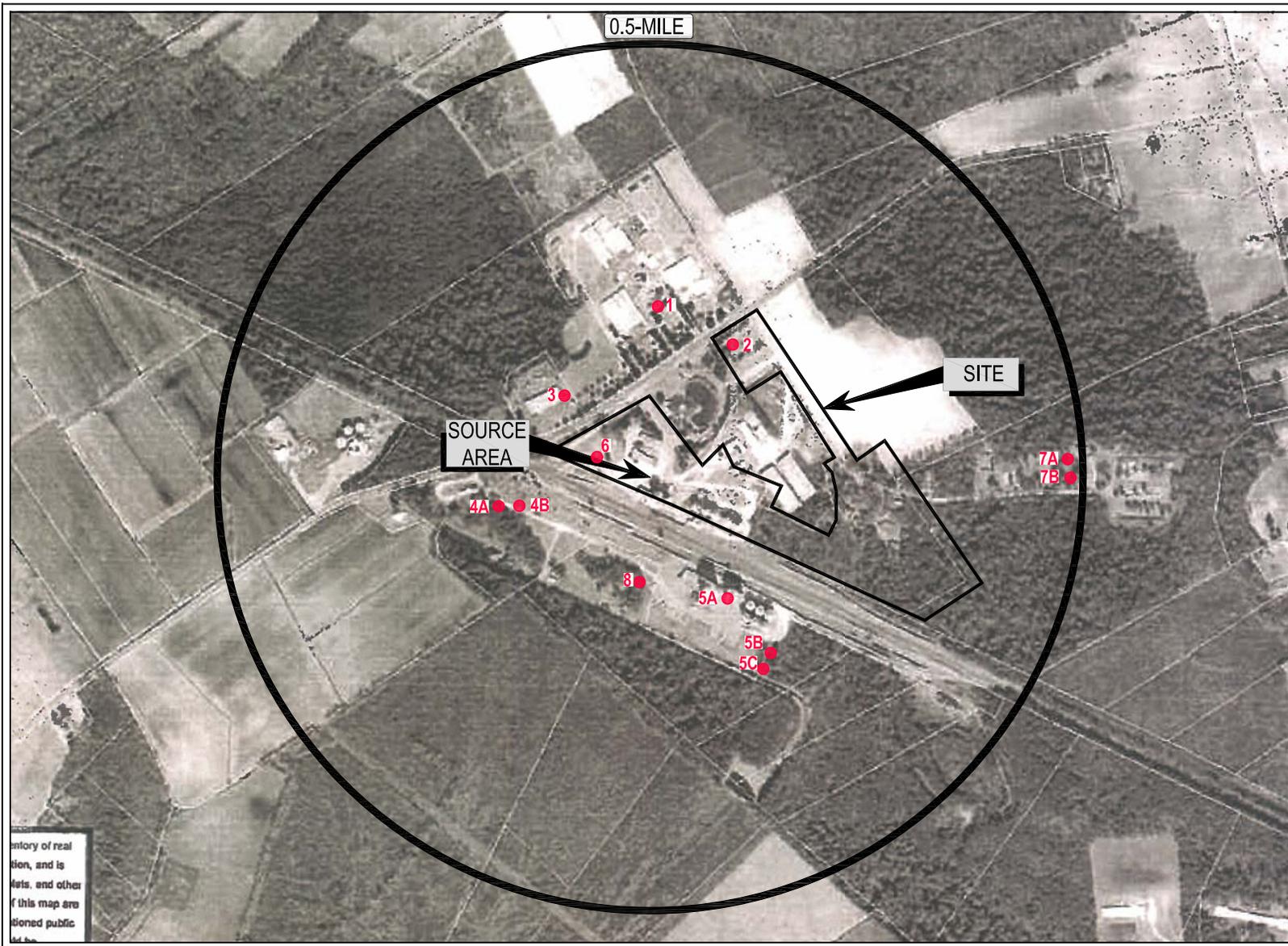
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Drawn By:	RLW	Scale:	AS SHOWN
Checked By:	KAM/MRF	File No.	WP72147025-3
Approved By:	KAM	Date:	NOV. 2014

**Terracon**  
 Consulting Engineers and Scientists

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 (252) 353-1600 (252) 353-0002

SOIL SAMPLE LOCATION MAP  
 WORK PLAN  
 GOLDBORO MILLING COMPANY (MILL1)  
 938 MILLERS CHAPEL ROAD  
 GOLDSBORO, NC

FIG. No.	6
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History of real  
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**LEGEND**

- SITE
- WATER SUPPLY WELL

Project Mngr:	KAM	Project No.	72147025
Drawn By:	RLW	Scale:	AS SHOWN
Checked By:	KAM/MRF	File No.	WP72147025-7B
Approved By:	KAM	Date:	NOV. 2014

**Terracon**  
Consulting Engineers and Scientists

314 Beacon Drive Winterville, NC 28590  
(252) 353-1600 (252) 353-0002

**RECEPTOR SURVEY MAP**  
WORK PLAN  
GOLDSBORO MILLING COMPANY (MILL 1)  
938 MILLERS CHAPEL ROAD  
GOLDSBORO, NC

EXHIBIT  
**7**

THIS DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

REC PROGRAM DOCUMENT CERTIFICATION FORM - PAGE 1 OF 2

IHSB SITE NAME Goldsboro Milling Company  
DATE & NAME OF DOCUMENT Response Letter to REC Audit, November 19, 2014  
TYPE OF SUBMITTAL (circle all that apply): Report, Work plan, Work Phase Comp. Statement, Schedule Change

Response Letter to REC Audit

November 19, 2014

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

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

Goldsboro Milling Company  
Name of Remediating Party

John Pike  
Signature of Remediating Party

11/19/14  
Date

**NOTARIZATION**

NC (Enter State)

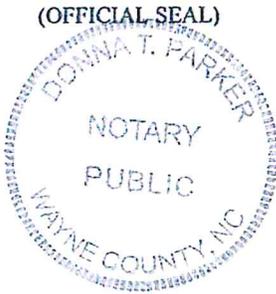
Wayne COUNTY

I, Donna T. Parker, a Notary Public of said County and State, do hereby certify that John Pike did personally appear and sign before me this day, produced proper identification in the form of NCDL, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 19<sup>th</sup> day of Nov., 2014.

Donna T. Parker  
Notary Public (signature) Donna T. Parker

My commission expires: 2-5-19.



IHSB SITE NAME Goldstboro Milling Company  
DATE & NAME OF DOCUMENT Response Letter to REC Audit, November 19, 2014  
TYPE OF SUBMITTAL (circle all that apply): Report, Work plan, Work Phase Comp. Statement, Schedule Change

**REGISTERED SITE MANAGER CERTIFICATION OF SIGNATURES**

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

Christopher L. Corbitt, P.G.

Name of Registered Site Manager

Christopher Corbitt

Signature of Registered Site Manager

11/20/2014

Date

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

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

Christopher L. Corbitt, P.G.

Name of Registered Site Manager

Christopher Corbitt

Signature of Registered Site Manager

11/20/2014

Date

**NOTARIZATION**

North Carolina (Enter State)

Mecklenburg COUNTY

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

WITNESS my hand and official seal this 20<sup>th</sup> day of November, 2014.

Clara A. Gary  
Notary Public (signature)

My commission expires: 3/23/2018



**From:** [Corbitt, Chris L.](#)  
**To:** [Macdonald, Janet K](#)  
**Subject:** RE: Goldsboro Milling - Mill#1 Project Audit  
**Date:** Friday, September 26, 2014 8:26:36 AM

---

Thanks Janet

**Christopher L. Corbitt, PG**  
**Senior Project Manager | Environmental Services**  
**Terracon Consultants, Inc**  
2020 Starita Rd. Suite E | Charlotte, NC 28206  
P 704-509-1777 | F 704-509-1888 | M 704-301-3089  
[clcorbitt@terracon.com](mailto:clcorbitt@terracon.com) | [www.terracon.com](http://www.terracon.com)

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**From:** Macdonald, Janet K [mailto:[janet.macdonald@ncdenr.gov](mailto:janet.macdonald@ncdenr.gov)]  
**Sent:** Thursday, September 25, 2014 4:19 PM  
**To:** Corbitt, Chris L.; John Pike ([john.pike@goldsboromilling.com](mailto:john.pike@goldsboromilling.com)) ([john.pike@goldsboromilling.com](mailto:john.pike@goldsboromilling.com))  
**Subject:** Goldsboro Milling - Mill#1 Project Audit

Hello, Chris,

Attached are the findings from the audit of the Remedial Investigation Work Plan. I just had a question about some missing information. Feel free to contact me if you have any questions.

*Janet*

Janet K. Macdonald, P.G.  
Inactive Hazardous Sites Branch - REC Program  
NCDENR - Division of Waste Management  
217 West Jones Street  
Raleigh, North Carolina 27603  
Direct Phone: (919) 707-8349  
e-mail: [Janet.Macdonald@ncdenr.gov](mailto:Janet.Macdonald@ncdenr.gov)  
<http://portal.ncdenr.org/web/wm/si/ihs/recprogram>

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---

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North Carolina Department of Environment and Natural Resources

Pat McCrory  
Governor

John E. Skvarla, III  
Secretary

SENT VIA ELECTRONIC MAIL

September 25, 2014

Mr. Chris Corbitt  
Terracon Consultants, Inc.  
314 Beacon Drive  
Winterville, NC 28590

Re: REC Document Audit  
Goldsboro Milling-Mill#1  
Goldsboro, Wayne County, NC  
Site ID No.: NONCD0002891

Dear Mr. Corbitt:

As required by law, the Inactive Hazardous Sites Branch (Branch) performs audits of remedial actions carried out by environmental consulting firms at sites in the privatized Registered Environmental Consultant (REC) Program. Self-certification by RECs replaces state oversight of the cleanup activities. As such, auditing of remedial activities for regulatory compliance is conducted to ensure protection of public health and the environment. These audits also help us improve our procedures, guidance documents, and training for RECs working on projects in the program.

I have performed an audit of the Remedial Investigation (RI) Work Plan, dated September 24, 2013, that you certified as the Registered Site Manager (RSM) for the Goldsboro Milling-Mill#1 site (Site). A RI Work Plan needs to include a clear understanding of the known and/or suspected sources of contamination along with the locations of receptors and sensitive environments in the area that could become impacted by a release. This information is also needed so interested parties, including the general public and Branch, can understand how your investigation plan will address any important concerns.

The work plan appears to be missing information important to planning a RI. The site map should have a scale and locations of known or suspected spill or disposal areas [.0306(g)(4)]. Soil and groundwater sampling points with the estimated extent of contamination should also be located on the scaled map [.0306(g)(15)]. In addition, as I already mentioned in an email dated November 7, 2013, a potable water survey must extend ½ mile from the source area or point of identified contamination [.0306(g)(6)]. Finally, property boundaries and adjacent property owners and land usage should be identified on a site survey plat (or preliminary site map) [.0306(g)(4)].

Although you mention that this information will be provided in the RI Report, understanding the spatial extent of identified contamination relative to potential receptors and sensitive environments is important for planning a complete RI. These details should help dictate where you plan to collect data, what tests you

will need to perform, etc. before initiating field work. In most cases, this information is either known from prior work or can be obtained through desk-top research. If this information is contained in another previous report, please provide a reference as to where it can be found, or explain why this information was not included in your work plan.

Your response (certified by you and the remediating party) can be submitted within 60 days or with the next quarterly update or document that will be submitted during the next quarter. If you have any questions or need to discuss the ongoing project activities, or would like a paper copy of this letter mailed to you, please contact me at (919) 707-8349 or [Janet.Macdonald@ncdenr.gov](mailto:Janet.Macdonald@ncdenr.gov).

Sincerely,

A handwritten signature in blue ink that reads "Janet Macdonald". The signature is written in a cursive, flowing style.

Janet K. Macdonald, P.G.  
Hydrogeologist  
REC Program, Division of Waste Management, NCDENR

cc: Mr. John Pike

**From:** [Corbitt, Chris L.](#)  
**To:** [Macdonald, Janet K](#)  
**Subject:** RE: Goldsboro Milling  
**Date:** Friday, September 19, 2014 11:38:04 AM

---

Thanks for the heads up Janet

**Christopher L. Corbitt, PG**  
**Senior Project Manager | Environmental Services**  
**Terracon Consultants, Inc**  
2020 Starita Rd. Suite E | Charlotte, NC 28206  
P 704-509-1777 | F 704-509-1888 | M 704-301-3089  
[clcorbitt@terracon.com](mailto:clcorbitt@terracon.com) | [www.terracon.com](http://www.terracon.com)

---

**From:** Macdonald, Janet K [mailto:[janet.macdonald@ncdenr.gov](mailto:janet.macdonald@ncdenr.gov)]  
**Sent:** Friday, September 19, 2014 11:36 AM  
**To:** Corbitt, Chris L.  
**Subject:** Goldsboro Milling

Hello Chris,

As you know the REC Program is required to routinely conduct audits of REC site projects. This is a courtesy notice that your Remedial Investigation Work Plan, submitted on 11/14/13 for the above-named site, is currently under review. Our review will initially result in a letter to you with questions about the report or project that will allow you to explain and clarify any of our findings. Following your response, a final letter will be issued to indicate whether the work is sufficient, whether any minor deficiencies warrant a Notice of Deficiency, or whether significant violations of the REC Rules warrant a Notice of Violation.

The first letter will be sent via email sometime next week. Thanks for hard work in the REC Program.

*Janet*

Janet K. Macdonald, P.G.  
Inactive Hazardous Sites Branch - REC Program  
NCDENR - Division of Waste Management  
217 West Jones Street  
Raleigh, North Carolina 27603  
Direct Phone: (919) 707-8349  
e-mail: [Janet.Macdonald@ncdenr.gov](mailto:Janet.Macdonald@ncdenr.gov)  
<http://portal.ncdenr.org/web/wm/sf/ihs/recprogram>

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Terracon provides environmental, facilities, geotechnical, and materials consulting engineering services

delivered with responsiveness, resourcefulness, and reliability.

---

*Private and confidential as detailed here ([www.terracon.com/disclaimer](http://www.terracon.com/disclaimer)). If you cannot access hyperlink, please e-mail sender.*