

**Parris, Bruce**

---

**From:** Parris, Bruce  
**Sent:** Wednesday, July 27, 2011 9:57 AM  
**To:** Eskenasy, Diane  
**Subject:** RE: Volvo Construction Equipment - Asheville, NC

Another quick note. The H&H report states that there is no 2L standard for 4-chlorotoluene aka p-chlorotoluene.  
An interim 2L standard of 24 ppb was passed for this compound on October 1, 2010.

Bruce Parris - Bruce.Parris@ncdenr.gov  
Environmental Supervisor II, Western Region North Carolina Dept. of Environment & Natural Resources Div. of Waste Mgt. - Superfund Section - Inactive Hazardous Sites Branch  
Mooresville Regional Office 610 East Center Street, Suite 301 Mooresville, NC 28115  
Ph: (704) 663-1699 Fax: (704) 663-6040

\*\*\*\*\*  
E-mail 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.  
\*\*\*\*\*

-----Original Message-----

From: Parris, Bruce  
Sent: Wednesday, July 27, 2011 9:41 AM  
To: Eskenasy, Diane  
Subject: RE: Volvo Construction Equipment - Asheville, NC

Diane,  
I hope life is treating you well!

I'll provide some written guidance here so you can more easily refer back to it but also feel free to call and discuss further after you read and have a chance to mull it over.

Looks to me like they have both petroleum issues remaining that would fall under your group's regulation and also non-petroleum issues (specifically 2-Chlorotoluene, 4-Chlorotoluene, Manganese, Tetrachloroethylene and methylene chloride that will fall under IHSB regulation. It looks like their paint operation and storage areas have the main issues for us, however, the manganese seems to be distributed to the sump areas.

They would need to submit the report along with New Site Notification form to our office for processing. We'll assign them an ID number for the state's Superfund Site Inventory and send them a NORR. If they want to pursue voluntary remediation with our agency, they can then submit a Site Cleanup Questionnaire. We'll review the data in the Questionnaire along with their supporting information (which includes receptor information) and decide whether we need to oversee the site as a priority case and assign it to one of our 6 project managers, or let them pursue self-directed assessment and remediation in our privatized Registered Environmental Consultant Program. The majority of site are referred to the REC Program unless there are potential direct human health impact concerns associated with the site. If they want to be proactive, they can go ahead and submit a New Site Notification Form and a Site Cleanup Questionnaire at the same time. If they don't want to voluntarily perform assessment/remediation with our Branch and there are no human health impact concerns, they'll sit on our inventory until we can get back to them (along with a couple thousand other sites)

with an Administrative Order forcing them to perform the work (at which point they lose out on their guaranteed 5 million dollar remediation cost expenditure limit).

The complicated part of their report to me are the sump areas and whether they drain to subsurface oil/water separators and/or waste oil tanks or not. If they are subsurface oil/water separators (or waste oil tanks), wouldn't all the contaminants associated with that system be under the UST Section's regulatory oversight? If the sumps drain to above ground oil/water separators or waste oil tanks, the petroleum would fall to the UST Section's regulatory oversight but the non-petroleum part would fall to the Superfund Section. I've also been told that the HWS also regulates waste oil but in practice I haven't seen that this is the case and the waste oil usually goes to the UST Section. I'm not clear from their report whether the oil/water separators or waste oil tanks are above ground or below ground (by the % specified in the UST rules that would make it a UST or AST).

Either way, they appear to have a regulatory issue falling under both our agencies.

Thanks!

Sincerest Regards,  
Bruce

Bruce Parris - Bruce.Parris@ncdenr.gov  
Environmental Supervisor II, Western Region  
North Carolina Dept. of Environment & Natural Resources  
Div. of Waste Mgt. - Superfund Section - Inactive Hazardous Sites Branch  
Mooresville Regional Office  
610 East Center Street, Suite 301  
Mooresville, NC 28115  
Ph: (704) 663-1699 Fax: (704) 663-6040

\*\*\*\*\*  
E-mail 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.  
\*\*\*\*\*

-----Original Message-----

From: Eskenasy, Diane  
Sent: Tuesday, July 26, 2011 4:27 PM  
To: Parris, Bruce  
Subject: FW: Volvo Construction Equipment - Asheville, NC

Bruce, here is the Hart & Hickman report that I was unable to attach to my previous email.

Thanks again for providing guidance!

Diane

Diane Eskenasy, Hydrogeologist  
diane.eskenasy@ncdenr.gov  
(828) 296-4500

UST Section/DWM/NC DENR

2090 US 70 Highway  
Swannanoa, NC 28778

UST Section programs and guidance:  
<http://portal.ncdenr.org/web/wm/ust>

NON - UST Petroleum Releases:  
<http://portal.ncdenr.org/web/wm/ust/nustmain>

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.

---

From: Sergio Rojas [srojas@brinkenv.com]  
Sent: Monday, July 25, 2011 3:35 PM  
To: Eskenasy, Diane  
Cc: 'Robinson Rick'; 'Bartz John'; 'John Checchio'  
Subject: Volvo Construction Equipment - Asheville, NC

Diane,

It was a pleasure speaking with you earlier today. As discussed, please find the attached reports summarizing recent investigations performed by others at the above-referenced site. Provided that you would be able to review this information with the next week, we would like to set up a conference call with you on Monday (8/1/11) to discuss the findings. Please let us know if you would be available for such a call.

Regards,  
Sergio Rojas  
Project Manager  
[cid:image001.gif@01CC4AE0.67687350]

1913 Atlantic Avenue, Suite R5  
Manasquan, New Jersey 08736  
Phone: 732-223-2225  
Fax: 732-223-3666  
Web: [www.BrinkEnv.com](http://www.BrinkEnv.com)<blocked::http://www.brinkenv.com/>