



VIA EMAIL AND US MAIL

336-741-5000

rjrt.com

May 29, 2009

Jason Watkins
Central District Supervisor
Solid Waste Section
Division of Waste Management
NCDENR
585 Waughtown Street
Winston-Salem, NC 27107-2275

Dear Mr. Watkins:

Following up on the informal conference on Monday, May 18, 2009 between R.J. Reynolds Tobacco Company ("RJRT") and representatives from NCDENR Division of Waste Management ("DWM") and my subsequent email dated May 21, 2009, RJRT is responding to the "Conditions for Compliance" set forth in the April 17, 2009 Compliance Order.

RJRT has retained the services of ERM NC, PC (ERM) to develop an assessment work plan in accordance with the Compliance Order.

By June 30, 2009, ERM will submit an assessment work plan to the NCDENR Division of Waste Management for its review and comment. In preparation of the work plan, ERM has (1) conducted a historical file review at the Raleigh DWM central files, (2) inspected existing site conditions, (3) performed a preliminary site reconnaissance, and (4) met with RJRT representatives to review available historical documents.

Based on all of the above, ERM anticipates that the initial Phase of the assessment work plan will include:

- **Prepare Updated Site Map** - Assemble available survey information of boundaries and locations for required survey plat.
- **Surface Water Monitoring** - Develop and implement an expanded surface water monitoring program that would include a proposed network of new surface water sampling locations upgradient and downgradient of the areas surrounding the ash landfill.
- **Develop Site Conceptual Model** - Site reconnaissance for mapping local geologic features to assist with enhancing the current hydrogeologic conceptual model of the Site. Compile previous subsurface information including surficial soils, bedrock, ground water flow regimes and current

ground water and surface water monitoring locations. Evaluate historical trends pertaining to ground water and surface water quality. Based on the site conceptual model, ERM will evaluate the competency of the existing groundwater monitoring program.

- **Sensitive Receptor Survey** - Survey of sensitive ground water receptors in the areas surrounding the ash landfill.
- **Summary Report** – Report the major findings of the initial phase of the site assessment and the proposed scope of work for the second phase of the site assessment. The second phase of work will include additional characterization activities needed to provide a comprehensive site assessment (i.e. installation of observation wells to fill “data gaps”, if needed).

The final assessment plan will be submitted to NCDENR DWM within 14 days of receipt of any comments from the DWM.

If you have any questions, you may contact me at 336-741-5146 or email at curls@rjrt.com.

Sincerely,



Stephen C. Curl, PE
Sr. Manager – Environment, Health and Safety

Cc: Mr. John Patrone – NCDENR, DWM
Ms. Jaclyne Drummond – NCDENR, DWM
Mr. David W. Wasiela, PE (ERM)
Mr. Alan Martin, PG (ERM)
Mr. Max E. Hopkins, PE (RJRT)