



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Dexter R. Matthews

Director

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Governor

Dee Freeman
Secretary

September 20, 2012

BB&T Site Biweekly Update

On Sept. 6, 2012, the DSCA Program's contractor, Withers & Ravenel Inc., (W&R) contacted DSCA to inform us that the soil backfilling process for the excavation was being suspended while they worked with their subcontractor to investigate an issue with the backfill delivered to the BB&T site. W&R reported that on the morning of Sept. 6, 2012 their field staff noticed a petroleum odor in the first truckload of fill dirt (backfill) delivered to the site. All trucks, including the first, were immediately ordered to return to the backfill's facility of origin. On that same morning, W&R discovered through further investigation that the backfill source had low levels of petroleum-based chemicals. The backfill source was obtained from a soil stockpile at a local soil "borrow" facility.

W&R promptly reported this finding to the N.C. Division of Waste Management and began an investigation of the five-to-seven foot layer of soil backfill placed in the BB&T excavation on Aug. 30 and 31, 2012. That investigation included collecting a limited number of soil samples on Sept. 6 and 13, 2012. Sampling results were received on Sept. 18, 2012, and confirmed that the soil backfill contains low concentrations of total petroleum hydrocarbons (TPH) consistent with diesel motor fuels. Based on these results and the uncertainty of the distribution of potential contaminants in the backfill, the DSCA Program concluded that backfill was unsuitable and should be removed from the excavation and clean backfill placed as soon as possible.

To comply with the DSCA Program's determination, additional sampling of the backfill has been performed and a plan for proper management of the impacted backfill is being developed by W&R. W&R will direct the implementation of the plan to remove the impacted backfill and place approved backfill in the excavation at no cost to the DSCA Fund. W&R is in direct communication with DSCA, and all actions taken to address this situation will be in compliance with state and federal regulations and will meet standards set forth in the site Remedial Action Plan (RAP). The attached figure documents the locations and results of samples collected from the backfill within the excavation to determine its proper disposition.

Other than the time delay that this issue has caused, the impacted backfill should not have caused any adverse affect on the outdoor air quality, soil vapor, groundwater quality or indoor air concentrations in nearby structures. W&R's prompt action on Sept. 6th prevented placement of backfill that had the potential to be more highly impacted. Outdoor air monitoring will occur throughout the duration of the backfill removal and replacement – meeting the standard of the RAP.

W&R's specifications for the backfill removal at the site will require that their subcontractor begin the process of removing the five-to-seven foot layer of impacted backfill and transporting that material to an offsite disposal facility. Due to the recent rain events, the removal of the backfill will begin as site conditions are suitable. W&R estimates that the removal and replacement of the soil backfill should be completed by late Oct. 2012.

The schedule for completing the remaining portion of the project, including soil vapor monitoring, indoor air monitoring, injection of EHC and groundwater monitoring will be updated once the backfill removal schedule has been confirmed. A subsequent update will be made to the community and posted on the DSCA website at that time.

If you have any comments or questions please contact Billy Meyer at 919-707-8366 or by email at billy.meyer@ncdenr.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Billy Meyer". The signature is cursive and somewhat stylized.

Billy Meyer
DSCA Project Manager

| TP-10 | A | B | C |
|-------------|-----|--------|-----|
| PCE | BDL | 0.0084 | BDL |
| TCE | BDL | BDL | BDL |
| CIS-1,2-DCE | BDL | BDL | BDL |

| TP-10 COMP | ANALYTE | RESULT (mg/kg) |
|------------|---------|----------------|
| | ARSENIC | 5.83 |
| | MERCURY | 0.0164 |
| | SILVER | 0.882 |
| | DRO | 14 |

| TP-11 | A | B | C |
|-------------|-----|-------|--------|
| PCE | BDL | 0.003 | 0.0004 |
| TCE | BDL | BDL | BDL |
| CIS-1,2-DCE | BDL | BDL | BDL |

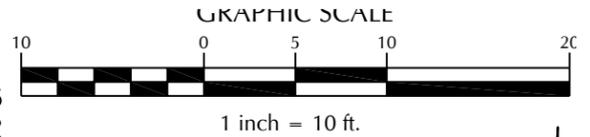
| TP-11 COMP | ANALYTE | RESULT (mg/kg) |
|------------|----------|----------------|
| | ARSENIC | 7.99 |
| | CHROMIUM | 57.5 |
| | SILVER | 0.711 |
| | DRO | 3.9 |

| TP-9 | A | B | C |
|-------------|-----|--------|--------|
| PCE | BDL | 0.045 | BDL |
| TCE | BDL | 0.0051 | 0.0026 |
| CIS-1,2-DCE | BDL | 0.084 | BDL |

| TP-9 COMP | ANALYTE | RESULT (mg/kg) |
|-----------|---------|----------------|
| | ARSENIC | 5.20 |
| | MERCURY | 0.0156 |
| | SILVER | 0.831 |
| | DRO | 3.6 |

| TP-8 COMP | ANALYTE | RESULT (mg/kg) |
|-----------|----------|----------------|
| | ARSENIC | 7.16 |
| | CHROMIUM | 86.6 |
| | MERCURY | 0.0790 |
| | SILVER | 1.53 |
| | DRO | 8.2 |

| TP-8 | A | B | C |
|-------------|-------|--------|--------|
| PCE | 0.016 | 0.0012 | 0.011 |
| TCE | 0.001 | BDL | 0.0006 |
| CIS-1,2-DCE | 0.011 | BDL | 0.0072 |



| TP-4 COMP | ANALYTE | RESULT (mg/kg) |
|-----------|---------|----------------|
| | ARSENIC | 5.43 |
| | MERCURY | 0.0416 |
| | SILVER | 0.863 |
| | DRO | 27 |
| | GRO | 2.2 |

| TP-4 | A | B | C |
|-------------|-----|-----|--------|
| PCE | BDL | BDL | 0.0012 |
| TCE | BDL | BDL | BDL |
| CIS-1,2-DCE | BDL | BDL | BDL |

| TP-5 COMP | ANALYTE | RESULT (mg/kg) |
|-----------|---------|----------------|
| | ARSENIC | 7.99 |
| | MERCURY | 0.0509 |
| | SILVER | 0.989 |
| | DRO | 4.1 |

| TP-5 | A | B | C |
|-------------|-----|-----|--------|
| PCE | BDL | BDL | 0.0015 |
| TCE | BDL | BDL | BDL |
| CIS-1,2-DCE | BDL | BDL | BDL |

LEGEND

- C NORTHERN SIDEWALL SAMPLE: ONE TO TWO FEET BELOW TOP OF FILL / TOP OF TEST PIT SURFACE
- B TEST PIT BOTTOM SAMPLE: FOUR TO FIVE FEET BELOW TOP OF FILL / TOP OF TEST PIT SURFACE
- A SOUTHERN SIDEWALL SAMPLE: DEPTHS RANGED FROM TWO TO THREE FEET BELOW TOP OF FILL / TOP OF TEST PIT SURFACE



NOTE: ALL RESULTS REPORTED IN mg/kg. ONLY PCE, TCE, CIS-1,2-DCE, AND COMPOUNDS THAT EXCEEDED THE UNRESTRICTED USE LEVELS ARE SHOWN. DRO/GRO SHOWN WHEN DETECTED.

| TP-6 COMP | ANALYTE | RESULT (mg/kg) |
|-----------|---------|----------------|
| | ARSENIC | 5.74 |
| | MERCURY | 0.0277 |
| | SILVER | 0.914 |
| | DRO | 3.2 |

| TP-6 | A | B | C |
|-------------|-----|-----|-----|
| PCE | BDL | BDL | BDL |
| TCE | BDL | BDL | BDL |
| CIS-1,2-DCE | BDL | BDL | BDL |

| TP-7 COMP | ANALYTE | RESULT (mg/kg) |
|-----------|---------|----------------|
| | ARSENIC | 4.84 |
| | MERCURY | 0.0686 |
| | SILVER | 0.882 |
| | DRO | 4.1 |

| TP-7 | A | B | C |
|-------------|--------|------|-----|
| PCE | 0.0014 | 0.16 | BDL |
| TCE | BDL | BDL | BDL |
| CIS-1,2-DCE | BDL | BDL | BDL |

NOTE: ALL VOC RESULTS ARE SHOWN FOR GRAB SAMPLES A, B, & C. ALL OTHER RESULTS ARE COMPOSITED FROM TEST PIT EXCAVATED SOILS.

| Revisions | | | |
|-----------|-------------|------|----|
| No. | Description | Date | By |
| | | | |