



NORTH CAROLINA
Environmental Quality

ROY COOPER
Governor

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Secretary

MICHAEL SCOTT
Director

April 11, 2023

Sent Via US Mail & Email

Heather Niski, Real Estate Counsel
Phoenix Investors, LLC
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Milwaukee, WI 53202
hniski@phoenixinvestors.com

Subject: Work Plan for Evaluation of a Requested Pause of the Groundwater Treatment System
Alamac American - Lumberton
1885 Alamac Road
Lumberton, Robeson County
Brownfields Project Number **06001-02-078**

Dear Ms. Niski:

We have reviewed the work plan entitled *Work Plan for Evaluation of a Requested Pause of the Groundwater Treatment System* (Verdantas, January 2023). The work plan was prepared to support the request of the new property owner, Phoenix Investors, LLC (Phoenix), to the North Carolina Department of Environmental Quality, Division of Waste Management (DWM) to pause the operations of the groundwater extraction system at the above-referenced property for a proposed 90 day period.

DWM is in agreement that the groundwater extraction system may be paused for a period of at least 90 days given the recent identification of polyfluoroalkyl compounds (PFAS) in the groundwater at the former Alamac property as long as specific technical data are gathered before and during the pause period. This data is necessary in order to set a baseline to monitor the impact of pausing operation of the system on contaminant migration at the site. Extensions of the pause period beyond 90 days may be acceptable based on the data gathered before and during the pause. Our comments on the work plan related to the system pause are generally provided below. Specific comments on other issues, such as the vapor intrusion assessment components of the work plan are provided separately in electronic form.

The work plan was reviewed by DWM staff in both the Inactive Hazardous Sites Branch (IHSB) and the Brownfields Redevelopment Section (BRS), and take into consideration discussions we have had with the North Carolina Division of Water Resources (DWR). Specific information required prior to system pause is outlined below, some of which is incorporated in the work plan submitted in January 2023:

Prior to turning off recovery wells:

- 1) Locate all 20 monitoring wells associated with this property, MW-1 through MW-20, and evaluate their condition. Certain wells may need to be developed prior to sampling due to their age and lack of use. Wells MW-1 through MW-18 are located on the Alamac property and are all of stick-up construction. Two wells, MW-19 and MW-20, are located south of Jacobs Branch (aka Jacob Swamp Canal). These wells are flush-mounted at ground surface.
- 2) Locate production well (DW-1A) that is reportedly located at the southernmost corner of the property between the existing asphalt driveway/parking area and Jacobs Branch, approximately 20 to 30 feet east of Jacobs Branch.
- 3) Confirm total well depths and gauge water levels in all located wells and use data to create groundwater flow map(s) for the property.



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- 4) Collect groundwater samples from all located wells (both monitoring wells and production well). Samples should be analyzed for total volatile organic compounds (VOCs) using US EPA Method 8260 and PFAS compounds using US EPA Method 537.1.
- 5) Collect an upgradient and a downgradient surface water sample from Jacobs Branch. Analyze the samples for VOCs and PFAS compounds as discussed in item 4 above.
- 6) Sample pond water, pond effluent, and pond sediment for chemical analysis of VOCs and PFAS compounds using the methods noted in item 4 above.
- 7) Provide the laboratory data package to DEQ contacts as soon as available and follow up within 30 days of data receipt with a signed and sealed written report summarizing the findings after each sampling round, including an evaluation of the impact of the system pause on groundwater flow direction and contaminant migration.

After turning off recovery wells:

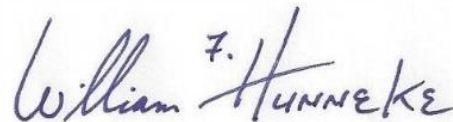
- 8) Approximately 60 days after recovery wells are turned off, repeat tasks outlined in items 3 and 5 above.
- 9) Approximately at 90 days after recover wells are turned off, provide DEQ with a report documenting findings and provide a basis and plan for either extending the pause period or evaluating options for continuing the discharge to the ponds after the pause period has concluded.
- 10) DEQ will evaluate the data collected and the report referenced in item 7 above to determine whether it will be necessary for you to conduct additional sampling of the monitoring wells, and to evaluate future options for the groundwater extraction system operation and pond discharge in consultation with DWR.

We look forward to working with you to evaluate future options pertaining to the groundwater extraction system and pond discharge. Please provide a revised work plan that incorporates these comments and includes a schedule for this scope of work. Please feel free to contact Sharon Eckard at sharon.eckard@ncdenr.gov or at 919.707.8379 with any questions.

Sincerely,



Bruce Nicholson, Chief
Brownfields Redevelopment Section



William Hunneke, Chief
Superfund Section

cc:

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