



2725 East Millbrook Road
Suite 121
Raleigh, NC 27604
Tel: 919-871-0999
Fax: 919-871-0335
www.atcassociates.com
N.C. Engineering License No. C-1598

March 31, 2014

Ms. Delonda Alexander
State of North Carolina
Department of Environment and Natural Resources
Division of Waste Management, Superfund Section
1646 Mail Service Center
Raleigh, North Carolina 27699

RE: Risk Management Plan
U.S. \$1.75 Cleaners
2900 Randleman Road
Greensboro, Guilford County, NC
ATC Project No. 45.34341.4103
DSCA Site Identification No. 41-0003

Dear Ms. Alexander:

ATC Associates of North Carolina, P.C. (ATC) is pleased to submit the enclosed Risk Management Plan (RMP) for the above referenced site. The results of a previous Risk Assessment indicate that contaminant concentrations at the site do not pose an unacceptable risk. The primary purpose of this RMP is to ensure that the assumptions made during the risk assessment remain valid in the future. Based on the documentation outlined in this report, ATC recommends issuance of a No Further Action letter for the site.

If you have questions or require additional information, please do not hesitate to contact Genna Olson at (919) 871-0999.

Sincerely,
ATC Associates of North Carolina, P.C.

Genna K. Olson, P.G.
Program Manager

**RISK MANAGEMENT PLAN
U.S \$1.75 CLEANERS
2900 RANDLEMAN ROAD
GREENSBORO, GUILFORD COUNTY, NORTH CAROLINA
ATC PROJECT NO. 45.34341.4103
DSCA SITE IDENTIFICATION NO. 41-0003
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U.S. \$1.75 Cleaners
2900 Randleman Road
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DSCA Site Identification No. 41-0003

Prepared By:

Submitted To:

**North Carolina Department of Environment
and Natural Resources**
Division of Waste Management
Superfund Section – DSCA Program
1646 Mail Service Center
Raleigh, North Carolina 27699



Meghan E. Greiner, P.E.
Project Engineer
N.C. Professional Engineer #34806



Genna K. Olson, P.G.
Program Manager
N.C. Professional Geologist #1660

Prepared By:

ATC Associates of North Carolina, P.C.
2725 East Millbrook Road, Suite 121
Raleigh, North Carolina 27604
Phone: (919) 871-0999
Fax: (919) 871-0335

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1.0 INTRODUCTION

ATC Associates of North Carolina, P.C. (ATC) has prepared this Risk Management Plan (RMP) for U.S. \$1.75 Cleaners on behalf of the North Carolina Drycleaning Solvent Cleanup Act (DSCA) Program. The site is located 2900 Randleman Road in Greensboro, Guilford County, North Carolina. This RMP is intended to comply with the requirements of the DSCA (N.C.G.S. 143-215.104A *et seqs*) and promulgated rules and follows the outline provided in the DSCA Program's risk-based corrective action (RBCA) guidance.

2.0 OBJECTIVES OF RMP

ATC completed assessment activities at the site which indicated that tetrachloroethylene (PCE) is present in groundwater above Title 15A NCAC 2L .0202 Groundwater Standards (2L Standards). PCE has also been detected in soil, but concentrations do not exceed unrestricted use standards. ATC completed a Risk Assessment for the site on July 17, 2013. The results of the Risk Assessment indicated that there are on-site risks that do exceed target risk levels. However, the risks will be managed based on site-specific land-use conditions that have been selected as part of the evaluation and which require an RMP. Thus, the objective of the RMP is to ensure that those site-specific land-use conditions remain valid in the future.

3.0 SUMMARY OF APPROVED RISK ASSESSMENT REPORT

Based on groundwater impacts above unrestricted use standards, ATC completed a Risk Assessment report for the site on July 17, 2013. This section summarizes the risk assessment, which resulted in the recommendation for no further action status for the site.

The first step in the risk assessment process included a development of an exposure model. In the most recent risk assessment update, ATC evaluated exposure pathways for one exposure unit which encompassed the area of impacts on the site property (labeled On-Site Exposure Unit). An exposure model for an off-site unit was not deemed warranted since the contamination is localized and confined to the site property. The protection of groundwater use and protection of surface water pathways were also evaluated during the risk assessment.

Complete exposure pathways identified for the On-Site Exposure Unit include indoor and outdoor inhalation of vapor emissions from soil and groundwater and the surficial soil exposure pathway. Note that the site property is currently non-residential and the future land-use for this property is not expected to change; however, ATC evaluated both residential and non-residential land-use in the Risk Assessment to evaluate potential land-use controls needed at the time of closure. The risk evaluation for the indoor inhalation pathway was evaluated in two ways. First, an evaluation was performed using indoor air data collected in the existing building. This evaluation passed for both a residential and commercial scenario.

Due to the potential for different vapor intrusion characteristics with alternate construction, the DSCA Program typically requires a vapor control restriction if the risk evaluation is based solely on indoor air data. To evaluate whether a vapor control restriction is warranted, ATC performed a second evaluation using sub-slab soil gas data for the indoor inhalation pathway. This evaluation failed for a residential scenario but passed for a commercial scenario. The source of the residential failure was the indoor inhalation of vapor emissions pathway. To address this failure, ATC recommends a land-use control specifying that no activities that cause or create a vapor intrusion risk may occur on the site property without prior approval of NCDENR.

The protection of groundwater use pathway was evaluated based on a point-of-exposure (POE) at the downgradient property boundary. Note that modeling under this scenario assumes that land-use controls limiting groundwater use can be enacted for the site property. The results of the risk assessment indicated that source soil and groundwater concentrations exceed the calculated SSTLs. However, plume stability monitoring has confirmed that the plume is stable and does not appear likely to impact the POE. The area of impacted soil is below the existing building, and plume stability could be impacted if the surface building cover is removed at a later date due to higher infiltration. However, ATC does not consider this a significant concern for the subject site due to the very limited area of impacted soil. PCE was detected in only one sample at the site at a concentration of 0.0068 milligrams per kilogram (mg/kg). A sample collected at a deeper depth in the same boring contained no detectable PCE, and surrounding borings also contained no detectable PCE. Based on the localized extent of impacted soil, ATC considers it unlikely that plume stability would be significantly impacted if the surface cover was

removed. As such, ATC concludes that the protection of groundwater use pathway is not a significant concern, assuming that land-use controls limited groundwater use can be enacted for the site property.

The protection of surface water pathway was evaluated based on a POE at the nearest downgradient surface water body, which is an unnamed stream located approximately 280 feet west of the source area. The results of the protection of surface water evaluation indicated no exceedences of SSTLs.

The Risk Assessment concluded that the risks associated with the contamination could be managed through implementation of land-use controls for the site property. Therefore, the Risk Assessment recommended risk-based closure for the site. Land-use controls proposed for the site are discussed in Section 6.0.

4.0 RAP COMPONENTS

4.1 Summary of Prior Assessment and Interim Actions

In November 1997, Law Environmental Services, Inc. completed a Phase I Environmental Site Assessment of Benchmark Square Shopping Center and findings showed a small area of environmental concern inside U.S. \$1.75 Cleaners. The Law report stated that "minor deterioration of the paint and floor were observed in the vicinity of the dry-cleaning machine at the cleaners."

S&ME completed additional assessment in 1997 and 1998. In December 1997, one temporary well, TW-1, was installed directly behind the cleaners. A groundwater sample collected from TW-1 contained PCE at 0.033 milligrams per liter (mg/L). Soil boring #1 was installed inside the dry-cleaner in the area of the most paint deterioration. Soil samples collected from the boring did not contain PCE or other chlorinated volatile organic compounds (VOCs). Four additional hand auger borings (HA-2, HA-3, HA-4 and HA-5) and three Geoprobe borings (P-1, P-3 and P-4) were advanced in January 1998. PCE was detected in one soil sample (P1-4) at a concentration of 0.0068 mg/kg and in one groundwater sample (P-1) at a concentration of 0.003

mg/L. A water supply well survey was also completed that indicated 25 water supply wells within 1,500 feet of the site, although all of the properties with wells were found to be connected to the public water service. The results of the December 1997 and January 1998 assessment activities were documented in a Limited Site Assessment (LSA) prepared by S&ME and dated January 21, 1998.

A petition for certification of the site to be entered into the North Carolina DSCA Program was submitted by the property owner, Benchmark Properties, in March 2002. The site was subsequently certified into the program in August 2002.

S&ME completed a Prioritization Ranking Report on June 18, 2004, for submittal to the DSCA Program. The report documented the historical assessment data and an expanded water supply well survey encompassing the area within 2,500 feet of the site. The results of the survey indicated 35 water supply wells within 2,500 feet of the site, although all of the properties with wells were found to be connected to the public water service.

ENSR began investigation at the site under contract to the DSCA Program in 2006. ENSR conducted an updated receptor survey that identified 32 private water supply wells within 2,500 feet of the site. Of the 32 properties with wells, 29 were connected to the public water supply. ENSR was unable to determine if the remaining three wells were active or inactive. Five Type II monitoring wells (MW-1, MW-2, MW-3, MW-4 and MW-5) were installed in January 2007. Groundwater samples were collected from the monitoring wells and a surface water sample (SW-1) was collected approximately 280 feet west of the source area from an unnamed tributary of Ryan Creek. The results of the sampling event showed PCE concentrations exceeding the 2L Standard in groundwater samples collected from monitoring wells MW-1 (0.0016 mg/L) and MW-2 (0.0045 mg/L). No VOCs were detected in surface water sample SW-1. The results of the investigation were documented in a Prioritization Update Report dated February 2007.

In May 2007, an additional monitoring well, MW-6, was installed by ENSR. The results of another groundwater sampling event for the new and existing monitoring wells indicated PCE concentrations exceeded the 2L Standard in monitoring wells MW-1 (0.0024 mg/L), MW-2 (0.0052 mg/L), and MW-6 (0.011 mg/L). Additional groundwater sampling was performed in

September 2007, December 2007, and March 2008 with results remaining fairly consistent. The results of the 2007 and 2008 assessment activities were documented in a Groundwater Monitoring Report dated July 2008.

ATC assumed work at the site under contract to the DSCA Program in 2009. In July 2009, ATC performed a groundwater sampling event that indicated that PCE concentrations exceeding the 2L Standard in monitoring wells MW-1 (0.0013 mg/L), MW-2 (0.004 mg/L), and MW-6 (0.0083 mg/L). ATC also completed one direct-push boring (GP-2) for collection of a groundwater sample at the downgradient edge of the property. The purpose of the sampling was to evaluate whether the plume had migrated off-site in preparation for possible site closure. No constituents of concern were detected above 2L Standards in the sample. The results of ATC's investigation were documented in a Groundwater Investigation Report dated August 19, 2009.

Sometime between July and December, 2009, the dry-cleaner moved to a different tenant space in the shopping center. The dry-cleaner currently operates a drop-off/pick-up dry-cleaning operation and no longer actively performs dry-cleaning on-site.

Per the DSCA Program's Policy to Evaluate Indoor Air at Perchloroethylene (PCE) DSCA Sites, ATC completed sub-slab and indoor air sampling at the site in January 2010 to confirm whether the indoor inhalation of vapor emissions pathway poses a risk. The results of the sampling indicated that indoor air concentrations do not pose an unacceptable risk in accordance with the DSCA Program's indoor air risk evaluation process. The sampling was documented in a Soil Gas and Air Sampling Report dated July 14, 2010.

ATC compiled the recent and historical data for the site and prepared a Risk Assessment dated March 11, 2011. The DSCA Program subsequently changed their risk assessment procedures. In addition, revised toxicity values were issued by the Environmental Protection Agency for PCE and other constituents of concern. Therefore, ATC submitted an updated Risk Assessment July 17, 2013. The results of the updated risk assessment indicated that the risk associated with the site contamination remains below the risk levels considered acceptable by the DSCA Program. If land-use controls can be implemented to ensure the risk assessment assumptions remain valid in the future, no further action status is recommended for the site.

Between November 2013 and January 2014, ATC performed an updated receptor survey and water supply well sampling for the site. Although prior data indicated that the plume was likely confined to the site property, the water supply well survey and sampling were performed as a precautionary measure prior to site closure. On January 28, 2014, ATC collected a sample from water supply well 5192, located at 2913 Randleman Road, Greensboro, North Carolina. Analysis of the sample indicated detectable chloroform; however, the concentration was a laboratory estimated value below both the 2L Standards and the EPA Maximum Contaminant Level (MCL). Based on the concentration, ATC did not consider this detection a significant concern. ATC also attempted to sample additional water supply wells in the area. However, ATC found that either the wells were previously abandoned or the property owners did not grant access. The results of these activities were documented in a Water Supply Well Sampling Report dated March 20, 2014.

4.2 Remedial Action

According to the DSCA Program's RBCA guidance, no remedial action is necessary if four site conditions are met. Each of these conditions and their applicability to the subject site are addressed below.

Condition 1: The dissolved plume is stable or decreasing.

Periodic groundwater monitoring has been conducted at the site since 2007. Six groundwater sampling events have been conducted for monitoring wells MW-1 through MW-5. Five groundwater sampling events have been conducted for monitoring well MW-6. Constituents of concern (COCs) detected at the site historically include bromodichloromethane, chloroform, chloromethane, 1,1-dichloroethylene, and PCE. Of these constituents, only PCE has been detected at concentrations exceeding Title 15A NCAC 2L .0202 Groundwater Standards (2L Standards). As such, ATC focused on PCE for evaluation of plume stability.

ATC prepared a concentration versus time graph for sampling events conducted at the site for PCE. The graph shows an overall decreasing trend in PCE concentrations from 2006 through

2009. Based on these data, ATC concludes that the plume is stable or decreasing. Documentation of the plume stability evaluation, including a figure showing monitoring well locations, a table showing historical groundwater analytical data, concentration versus distance graphs, and concentration versus time graphs are included in **Appendix A**.

Condition 2: The maximum concentration within the exposure domain for every complete exposure pathway of any COC is less than ten times the representative concentration of that COC.

ATC evaluated the representative concentrations calculated during the Risk Assessment and found that this condition has been met for all COCs and exposure pathways.

Condition 3: Adequate assurance is provided that the land-use assumptions used in the DSCA Program's RBCA process are not violated for current or future conditions.

Land-use controls will be implemented for the site property to ensure the assumptions made in the Risk Assessment remain valid in the future. Refer to Section 6.0 for additional details regarding the proposed land-use controls for the site.

Condition 4: There are no ecological concerns at the site.

ATC completed a Level 1 Ecological Risk Assessment for the site in accordance with the DSCA Program's RBCA guidance. The results of the evaluation indicate that the release does not pose an unacceptable ecological risk. The completed Level 1 Ecological Risk Assessment Checklists A and B and associated attachments are included in **Appendix B**.

The site's compliance with the four above referenced conditions confirms that the contaminant concentrations are not likely to pose an unacceptable risk either at present or in the future. The plume is expected to naturally attenuate over time and the appropriate remedial action is to implement appropriate land-use controls on the site property where soil and/or groundwater contamination is present.

5.0 DATA COLLECTED DURING RMP IMPLEMENTATION

No further sampling or other data collection activities are proposed for the site, as long as the assumptions detailed in the NDCSRs remain valid. As such, this section is not applicable.

6.0 LAND-USE CONTROLS

As discussed in detail in Section 3.0, the recommendation for closure in the Risk Assessment for the site was based on the following land-use controls:

- Groundwater will not be utilized on the site property.
- No activities that cause or create a vapor intrusion risk may occur on the site property without prior approval of NCDENR.

Institutional controls will be implemented to ensure that land-use conditions are maintained and monitored until the land-use controls are no longer required for the site. A Notice of Dry-Cleaning Solvent Remediation (NDCSR) was prepared for the site property to comply with the land-use control requirement. The NDCSR is included in *Appendix C*. Refer to the NDCSR for the specific language to be incorporated to address each of the risk assessment assumptions detailed above. A plat showing the locations and types of dry-cleaning solvent contamination is included as an exhibit to the NDCSR. The locations of dry-cleaning solvent contamination are where contaminants have been detected above unrestricted use standards.

7.0 LONG-TERM STEWARDSHIP PLAN

The NDCSR contains a clause which requires that the owner of the site submit notarized “Annual Certification of Land-use Restrictions” to NCDENR on an annual basis certifying that the NDCSR remains recorded with the Register of Deeds and that land-use restrictions are being complied with. An example of such a certification is included in *Appendix D*.

8.0 RMP IMPLEMENTATION SCHEDULE

Since the contamination is stable and confined to the site property and possible exposure to the contamination is managed through the NDCSRs, no additional site remediation activities are required to implement the RMP. A 30-day public comment period will be held to allow the community an opportunity to comment on the proposed strategy. *Appendix E* includes example documents used to announce the public comment period in the local newspaper and to inform local officials, nearby property owners, and interested parties. As such, upon completion of the public comment period and final approval of the RMP, the NDCSR will be filed with the Guilford County Register of Deeds and will complete the RMP schedule.

9.0 CRITERIA FOR DEMONSTRATING RMP SUCCESS

The RMP will be successfully implemented once the required NDCSR has been executed and recorded with the Guilford County Register of Deeds. The NDCSR for the site property, at the request of the owner of the property, may be canceled by NCDENR after the risk to public health and the environment associated with the dry-cleaning solvent contamination and any other contaminants included in the dry-cleaning solvent assessment and remediation agreement has been eliminated as a result of remediation of the property. If NCDENR is notified of a change in site conditions, per the notification requirements detailed in the NDCSR, the RMP will be reviewed to determine if the site conditions have impacted the requirements set forth in the NDCSR and if changes are required. Enforcement of the RMP will be maintained through receipt of the “Annual DSCA Land-use Restrictions Certification” from the property owner as part of the NDCSR requirements.

10.0 CONTINGENCY PLAN IF RMP FAILS

As discussed above, unless the DSCA Program is notified of a change in land-use conditions at the site, per the notification requirements detailed in this plan, the RMP will remain in effect until the RMP has met its objectives and is considered a success. Pursuant to N.C.G.S. 143-215.104K, if any of the land-use restrictions (LUR) set out in the NDCSR are violated, the owner of the site property at the time the LURs are violated, the owner’s successors and assigns,

and the owner's agents who direct or contract for alteration of the site in violation of the LURs, shall be held liable for the remediation of all contaminants to unrestricted use standards.

11.0 CONCLUSIONS AND RECOMMENDATIONS

ATC has prepared this RMP for the U.S. \$1.75 Cleaners site on behalf of the NC DSCA Program. The results of a Risk Assessment indicated that contaminant concentrations at the site do not pose an unacceptable risk. The contaminant plume associated with the site appears stable or decreasing. This RMP specifies that the NDCSR requirements provide notification that land-use conditions observed during the risk assessment evaluation remain valid in the future. Based on the documentation contained in this report, ATC recommends issuance of a "No Further Action" letter.

APPENDIX A

DOCUMENTATION OF PLUME STABILITY EVALUATION

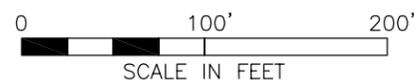
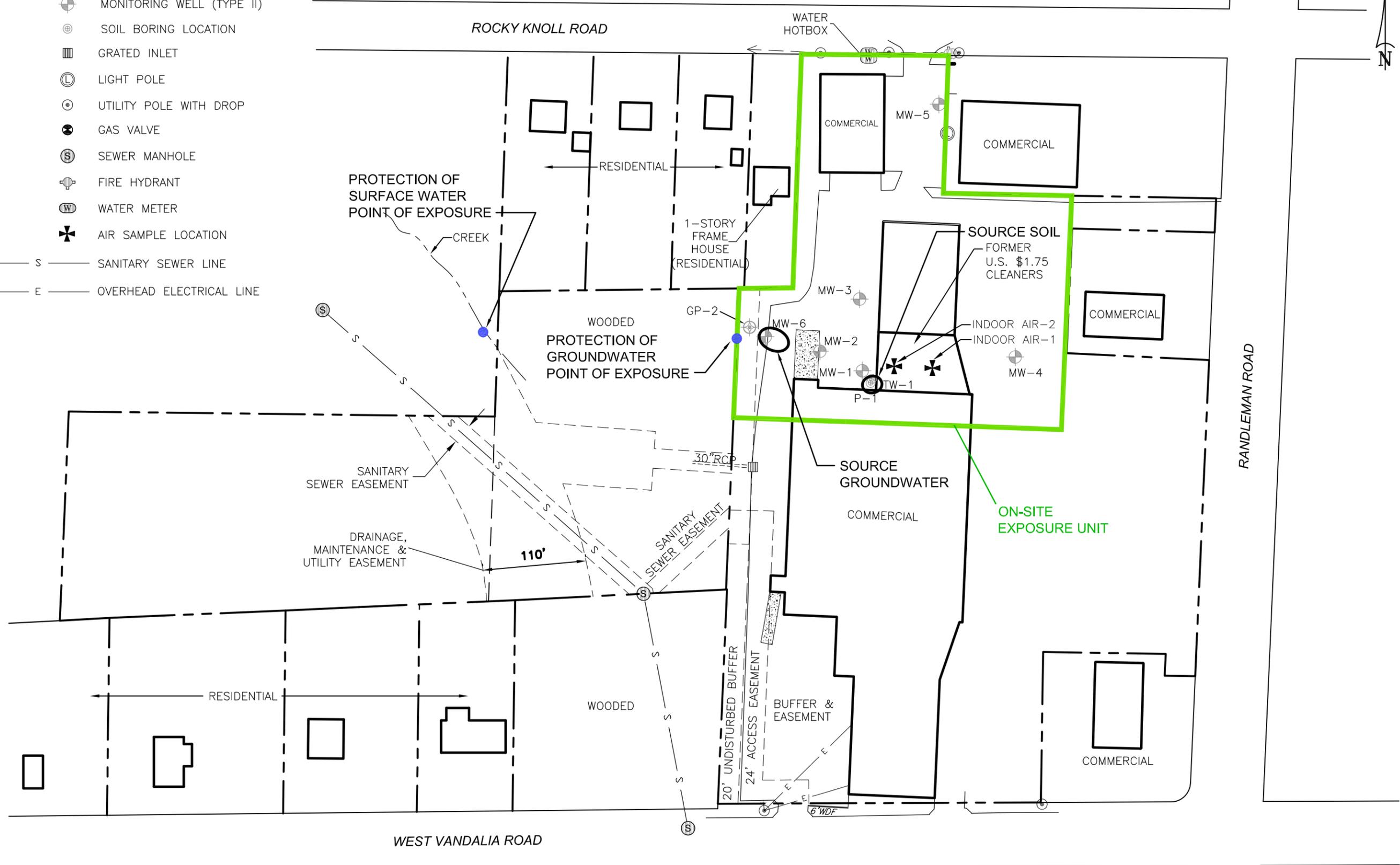
Table 5(1): Analytical Data for Groundwater (User Specified Chemicals)

DSCA ID No.: 41-0003							
Groundwater Sampling Point	Sampling Date (mm/dd/yy)	Chloromethane	Bromodichloromethane	2-Butanone	Acetone		
TW-1	12/4/97	<0.001	<0.001	NA	NA		
P-1	1/2/98	<0.001	<0.001	NA	NA		
P-2	1/2/98	<0.001	<0.001	NA	NA		
GP-2	7/15/09	0.00056J	<0.005	0.0028J	0.015J		
MW-1	1/4/07	<0.001	<0.001	<0.01	<0.05		
	5/23/07	<0.001	<0.001	<0.005	<0.01		
	9/4/07	<0.001	<0.001	<0.005	<0.01		
	12/12/07	<0.001	<0.001	<0.005	<0.01		
	3/19/08	<0.001	<0.001	<0.005	<0.01		
	7/6/09	0.0017J	<0.005	<0.001	<0.05		
MW-2	1/4/07	<0.001	<0.001	<0.01	<0.05		
	5/23/07	<0.001	<0.001	<0.001	<0.01		
	9/4/07	<0.001	<0.001	<0.005	<0.01		
	12/12/07	<0.001	<0.001	<0.005	<0.01		
	3/19/08	<0.001	<0.001	<0.005	<0.01		
	7/6/09	0.0013J	<0.005	<0.001	<0.05		
MW-3	1/4/07	<0.001	<0.001	<0.01	<0.05		
	5/23/07	<0.001	<0.001	<0.005	<0.01		
	9/4/07	<0.001	<0.001	<0.005	<0.01		
	12/12/07	<0.001	<0.001	<0.005	<0.01		
	3/19/08	<0.001	<0.001	<0.005	<0.01		
	7/6/09	0.0014J	<0.005	<0.001	<0.05		
MW-4	1/4/07	<0.001	<0.001	<0.01	<0.05		
	5/23/07	<0.001	<0.001	<0.005	<0.01		
	9/4/07	<0.001	<0.001	<0.005	<0.01		
	12/12/07	<0.001	<0.001	<0.005	<0.01		
	3/19/08	<0.001	<0.001	<0.005	<0.01		
	7/6/09	0.0019J	<0.005	<0.001	<0.05		
MW-5	1/4/07	<0.001	<0.001	<0.01	<0.05		
	5/23/07	<0.001	<0.001	<0.005	<0.01		
	9/4/07	<0.001	<0.001	<0.005	<0.01		
	12/12/07	<0.001	<0.001	<0.005	<0.01		
	3/19/08	<0.001	<0.001	<0.005	<0.01		
	7/6/09	0.0017J	<0.005	<0.001	<0.05		
MW-6	5/23/07	<0.001	<0.001	<0.005	<0.01		
	9/4/07	<0.001	<0.001	<0.005	<0.01		
	12/12/07	<0.001	<0.001	<0.005	<0.01		
	3/19/08	<0.001	<0.001	<0.005	<0.01		
	7/6/09	0.0016J	0.00023J	<0.001	<0.05		
NC 2L Standard		0.003	0.0006	NE	6		

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LEGEND

-  MONITORING WELL (TYPE II)
-  SOIL BORING LOCATION
-  GRATED INLET
-  LIGHT POLE
-  UTILITY POLE WITH DROP
-  GAS VALVE
-  SEWER MANHOLE
-  FIRE HYDRANT
-  WATER METER
-  AIR SAMPLE LOCATION
- S — SANITARY SEWER LINE
- E — OVERHEAD ELECTRICAL LINE

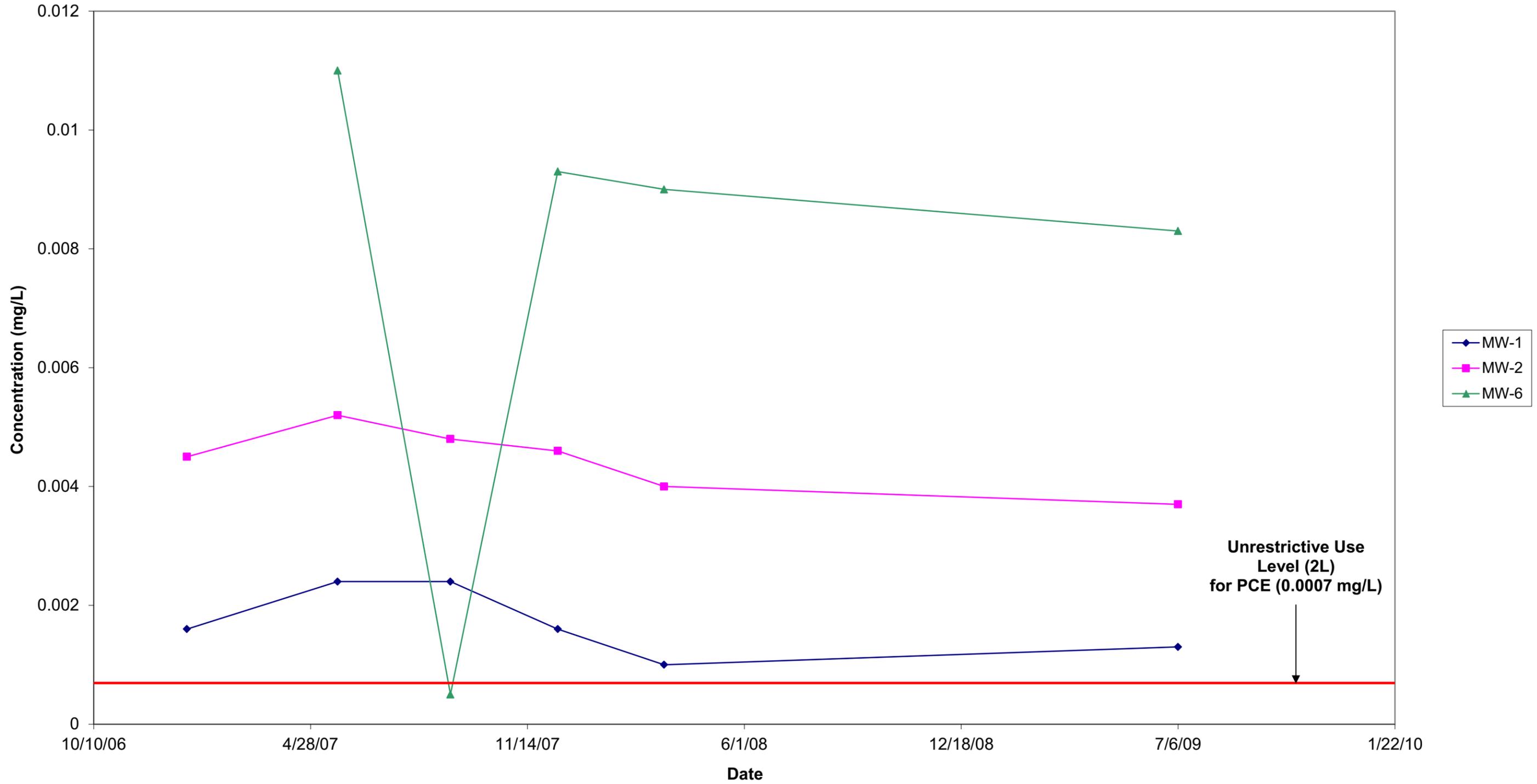


Raleigh, North Carolina 27604 (919) 871-0999 FAX (919) 871-0335

TITLE		ATTACHMENT 1A	
EXPOSURE UNIT MAP		U.S. \$1.75 CLEANERS	
2900 RANDLEMAN ROAD		GREENSBORO, NORTH CAROLINA	
CAD FILE	DSCA ID	PREP. BY	REV. BY
1253542.dwg	41-0003	MG	GO
SCALE	DATE	PROJECT NO.	
1"=100'	05-09-2013	45.34341.4103	

NOTES:

PCE Concentration vs. Time



APPENDIX B

LEVEL 1 ECOLOGICAL RISK ASSESSMENT CHECKLISTS

Appendix B
Ecological Risk Assessment – Level 1
US \$1.75 Cleaners
2900 Randleman Road
Greensboro, Guilford County, NC
ATC Project No: 45.34341.4103
DSCA Site ID: 41-0003

Checklist A

1. Are there navigable water bodies or tributaries to a navigable water body on or within the one-half mile of the site? Are there any water bodies anywhere on or within the one-half mile of the site?

Based on the Greensboro Quadrangle Topographic map and the United States Fish and Wildlife Service (USFWS), the closest tributary is an unnamed stream located approximately 280 feet to the west of the source area that flows north towards Ryan Creek. Ryan Creek is also located approximately 2,500 feet to the northwest. There is also an unnamed tributary located approximately 1380 feet to the east of the site. All of these waterways flow into the navigable South Buffalo Creek located approximately 1.4 miles to the north. See the topographic map in **Attachment 1** and the USFWS Ecomap in **Attachment 2**.

2. Are there any wetland areas such as marshes or swamps on or within one-half mile of the site?

In addition to the surface water bodies referenced in Question 1, there is a small freshwater pond located approximately 1,100 feet to the northwest, which drains into Ryan Creek.

3. Are there any sensitive environmental areas on or within one-half mile of the site?

Based on a review of the United States Fish and Wildlife Service (USFWS) online database, no sensitive or critical habitats are located within one-half mile of the site.

4. Are there any areas on or within one-half mile of the site owned or used by local tribes?

Based on site observations and historical research, no tribal artifacts or lands have been identified on or within one-half mile of the site.

5. Are there any habitat, foraging area or refuge by rare, threatened, endangered, candidate and/or proposed species (plants or animals), or any otherwise protected species on or within one-half of the site? Are there any threatened and/or endangered species (plant or animal) on or within one-half mile of the site?

Based on the USFWS online databases, there are no wilderness areas or wildlife refuges within one-half mile of the site. Additionally, there are no significant natural areas located within one-half mile of the site.

ATC reviewed the USFWS online species list. The following species were identified within Guilford County:

- *Haliaeetus leucocephalus* – Bald eagle: BGPA (Bald and Golden Eagle Protection Act)
- *Isotria medeoloides* – Small whorled pogonia: Threatened

ATC also reviewed the North Carolina Heritage online quadrangle species list. No threatened or endangered species were listed in the Greensboro Quadrangle.

6. Are there any breeding, roosting or feeding areas by migratory bird species on or within one-half of the site?

The Migratory Bird Treaty Act was developed to help reduce potential migratory bird strikes with aircraft, wind turbines and towers. Many species of birds are protected that are common to the United States, Canada, and Mexico. Therefore, many species of birds in Guilford County (e.g., Bald Eagle, Canadian Goose) are likely to be within one-half mile of the site.

7. Are there any ecologically, recreationally, or commercially important species on or within one-half mile of the site?

Based on site observations and desktop review, Ryan Creek, the unnamed tributaries, and the freshwater pond located within one-half mile of the site may be used for recreational fishing and may have areas for ecologically important species. No commercially important species were observed to be within one-half mile of the site.

Checklist B

1A. Can chemicals associated with the site leach, dissolve, or otherwise migrate to groundwater?

Yes. The primary constituent of concern is tetrachloroethylene (PCE). Based on published references (Environmental Protection Agency and United States Agency for Toxic Substances and Disease Registry), PCE is leachable to groundwater and is slightly soluble in groundwater. Furthermore, impacted groundwater has been confirmed at the site.

1B. Are chemicals associated with the site mobile in groundwater?

Yes. Chemical mobility is primarily influenced by the chemical solubility and soil-water partition coefficient. Based on these values, PCE is classified as moderately mobile (Fetter, 1988).

1C. Does groundwater from the site discharge to an ecological receptor habitat?

The primary ecological receptor habitats identified in the site vicinity are an unnamed stream located approximately 280 feet to the west of the source area and a small freshwater pond located approximately 1,100 feet to the northwest, both which drain into Ryan Creek. Ryan Creek is also located approximately 2,500 feet to the northwest. The path of groundwater flow has not been fully assessed between the subject site and these surface water features. However, the plume has been fully defined and does not extend off the site property. As such, the impacted groundwater does not appear likely to discharge to these ecological receptor habitats.

1. Could chemicals associated with the site reach ecological receptors through groundwater?

No. As discussed above, the plume is confined to the site property and does not appear likely to reach the nearest ecological receptor habitats.

2A. Are chemicals present in surface soils on the site?

No. Surficial soil contamination has not been detected at this site.

2B. Can chemicals be leached from or be transported by erosion of surface soil on the site?

No. Surficial soil contamination has not been detected at this site.

2. Could chemicals associated with the site reach ecological receptors through runoff or erosion?

No. Low concentrations of PCE have been identified in subsurface soil at approximately four feet below ground surface. It is unlikely that chemicals associated with the site would reach ecological receptors through runoff or erosion.

3A. Are chemicals present in the surface soil or on the surface of the ground?

No. Surficial soil contamination has not been detected at this site.

3B. Are potential ecological receptors on the site.

No. The primary ecological receptor habitat identified in the site vicinity is a tributary to Ryan Creek located approximately 280 feet west of the site. Some bird and plant species were identified that may not be associated with surface water or wetland areas, but the site is an active shopping center so these species appear unlikely to be present on the site property.

3. Could chemicals associated with the site reach ecological receptors through direct contact?

No. Surficial soil contamination has not been detected at this site.

4A. Are chemicals on the site volatile?

Yes. Chlorinated solvents are considered volatile organic compounds.

4B. Could chemicals on the site be transported in air as dust or particulate matter?

No. There is no impacted soil exposed at the ground surface.

4. Could chemicals associated with the site reach ecological receptors through inhalation of volatilized chemicals or adhered chemicals to dust in ambient air or in subsurface burrows?

No. As discussed above, there is no impacted soil exposed at the ground surface.

5A. Is Non-Aqueous Phase Liquid (NAPL) present at the site?

No. NAPL has not been encountered at the site.

5B. Is NAPL migrating?

No. NAPL has not been encountered at the site.

5C. Could NAPL discharge occur where ecological receptors are found?

No. NAPL has not been encountered at the site.

5. Could chemicals associated with the site reach ecological receptors through migration of NAPL?

No. NAPL has not been encountered at the site.

6A. Are chemicals present in surface and shallow subsurface soils or on the surface of the ground?

Impacted subsurface soils have been documented at approximately four feet below ground surface, but no impacted surficial soils have been documented.

6B. Are chemicals found in the soil on the site taken up by plants growing on the site?

No. The area of subsurface impacted soil is paved. Furthermore, most plant root systems are unlikely to extend to four feet below ground surface where impacted soils have been identified.

6C. Do potential ecological receptors on or near the site feed on plants (e.g., grasses, shrubs, forbs, trees, etc.) found on the site?

No. The site is an active shopping center with pavement overlying the area of impacted soil, so significant ecological receptors are unlikely to be present for a significant time period.

6D. Do chemicals found on the site bioaccumulate?

No. Based on published references (U.S. Agency for Toxic Substances and Disease Registry, 1997), PCE does not significantly bioaccumulate.

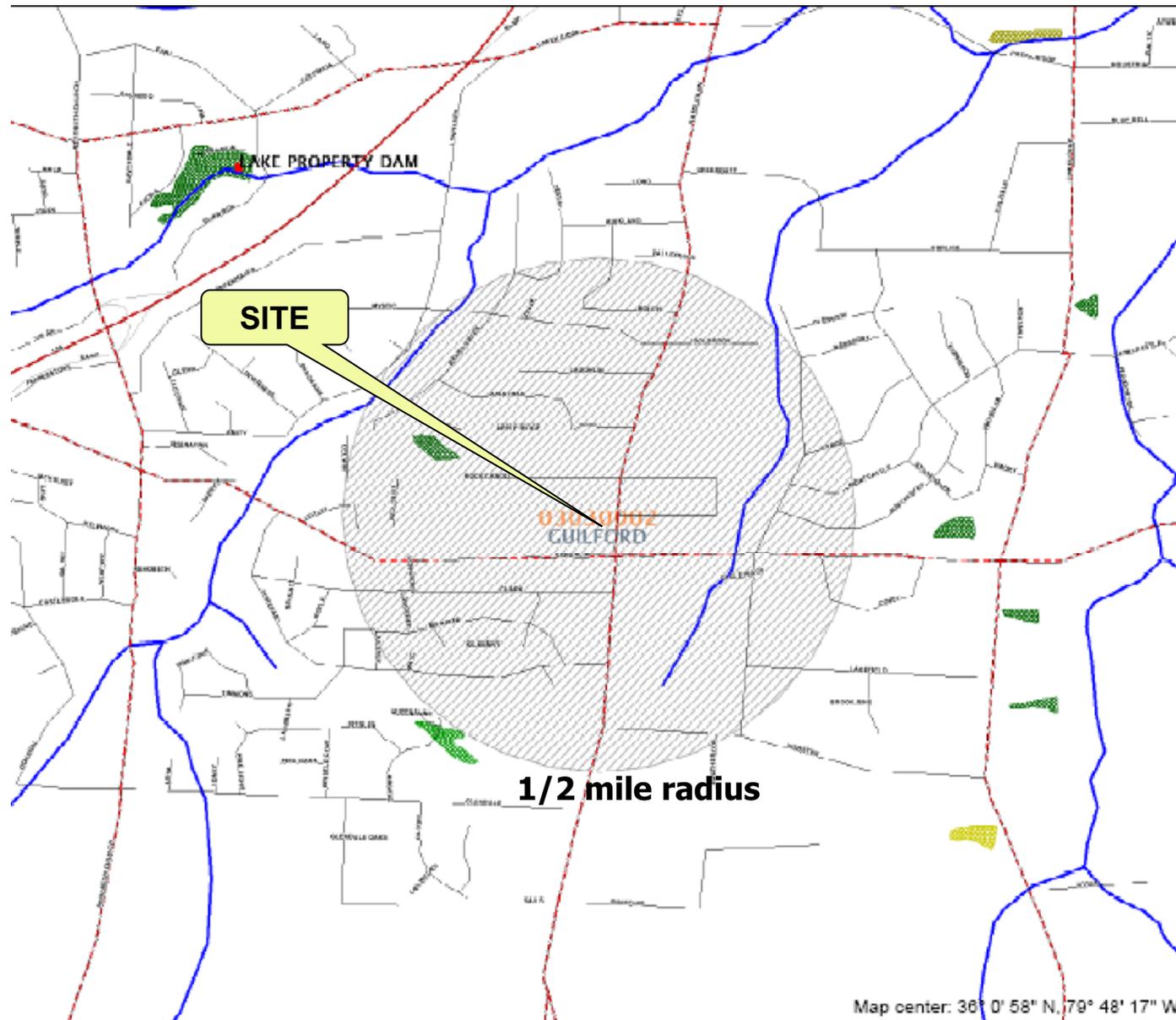
6. Could chemicals associated with the site reach ecological receptors through direct ingestion of soil, plants, animals, or contaminants?

No. Based on the low contaminant concentrations in soils, pavement overlying area of impact, commercial site environment, and absence of bioaccumulation for the chemicals of concern, it is not anticipated that chemicals associated with the site would reach ecological receptors through direct ingestion of soil, plants, animals, or contaminants.

Attachment 1: USGS Greensboro Quadrangle, Guilford County, NC: DSCA Site 41-0003 US \$1.75 Cleaners



Attachment 2: USFWS Greensboro Quadrangle, Guilford County, NC: DSCA Site 41-0003 US \$1.75 Cleaners



Map Legend

- Critical Habitat
- Barriers
- Railroads
- 8 Digit HUCs
- Streams
- Water Bodies
- Refuges
- NWI Wetlands**
- Estuary
- Estuarine Wetland
- Lake (Deep)
- Lake (Shallow)
- Open Water
- Marine Wetland
- Other Vegetated Wetland
- Inland Aquatic Bed
- Inland Herbaceous Wetland
- Inland Forested Wetland
- Inland Shrub Swamp
- Pond
- Pond (Drawdown)
- Tidal River
- Lower Perennial River
- Upper Perennial River
- Intermittent River
- Other Perennial River

APPENDIX C

NOTICE OF DRY-CLEANING SOLVENT REMEDIATION

NOTICE OF DRY-CLEANING SOLVENT REMEDIATION

Property Owner: Benchmark Square Properties, LLC
Recorded in Book _____, Page _____
Associated plat recorded in Plat Book _____, Page _____

This documentary component of a Notice of Dry-Cleaning Solvent Remediation (hereinafter "Notice") is hereby recorded on this ____ day of _____, 20__ by Benchmark Square Properties, LLC (hereinafter "Property Owner"). The survey plat component of the Notice is being recorded concurrently with this documentary component. The real property (hereinafter "Property") which is the subject of this Notice is located at 2900 Randleman Road, Greensboro, Guilford County, North Carolina, Parcel Identification Number (PIN) 7862158754.

The Property is contaminated with dry-cleaning solvent, as defined at North Carolina General Statutes (hereinafter "N.C.G.S."), Section (hereinafter "§") 143-215.104B(b)(9) and other contaminants. This Notice has been approved by the North Carolina Department of Environment and Natural Resources, or its successor in function (hereinafter "DENR") under the authority of the Dry-Cleaning Solvent Cleanup Act of 1997, as amended, N.C.G.S. § 143-215.104A *et seq.* (hereinafter "DSCA"), and is required to be filed in the Register of Deeds' Office in the county or counties in which the land is located, pursuant to NCGS § 143-215.104M.

Soil and groundwater at the Property are contaminated with dry-cleaning solvents associated with dry-cleaning operations at the former U.S. \$1.75 Cleaners (DSCA Site 41-0003) located at 2900 Randleman Road, Greensboro, in the Benchmark Square Shopping Center. Dry-cleaning operations were conducted on the Property from approximately 1993 to 2009.

Pursuant to N.C.G.S. § 143-215.104M, this Notice is being filed in order to reduce or eliminate the danger to public health or the environment posed by the Property. Attached hereto as **Exhibit A** is a reduction, to 8 1/2" x 11", of the survey plat component of the Notice required by N.C.G.S. § 143-215.104M. The survey plat has been prepared and certified by a professional land surveyor and meets the requirements of G.S. 47-30, and contains the following information required by N.C.G.S. § 143-215.104M:

(1) A description of the location and dimensions of the areas of potential environmental concern with respect to permanently surveyed benchmarks; and

(2) The type, location and quantity of regulated dry-cleaning solvent contamination and other contaminants known to exist on the Property.

Attached hereto as **Exhibit B**, is a legal description of the Property that would be sufficient as a description in an instrument of conveyance.

Pursuant to NCGS § 143-215.104M, a certified copy of this Notice must be filed within 15 days of receipt of DENR's approval of the Notice or the effective date of the dry-cleaning solvent remediation agreement, whichever is later. Pursuant to NCGS § 143-215.104M, the copy of the Notice certified by DENR must be recorded in the grantor index under the names of the owners of the land.

LAND-USE RESTRICTIONS

NCGS § 143-215.104M requires that the Notice identify any restrictions on the current and future use of the Property that are necessary or useful to maintain the level of protection appropriate for the designated current or future use of the Property and that are designated in the dry-cleaning remediation agreement. The restrictions shall remain in force in perpetuity unless canceled by the Secretary of DENR, or his/her designee, after the hazards have been eliminated, pursuant to NCGS §143-215.104M. Those restrictions are hereby imposed on the Property, and are as follows:

- 1. Without prior written approval from DENR, the Property shall not be used for:
 - a. child care centers or schools; or**
 - b. mining or extraction of coal, oil, gas or any mineral or non-mineral substances.****
- 2. No activities that cause or create a vapor intrusion risk (for example, construction of sub-grade structures that encounter contaminated soil or construction that places building users in close proximity to contaminated groundwater) may occur on the Property without prior approval of DENR.**
- 3. No activities that encounter, expose, remove or use groundwater (for example, installation of water supply wells, fountains, ponds, lakes or swimming pools that use groundwater, or construction or excavation activities that encounter or expose groundwater) may occur on the Property without prior approval of DENR.**
- 4. In January of each year, on or before January 31st, the owner of any portion of the Property shall submit a notarized Annual DSCA Land-Use Restrictions Certification to DENR certifying that this Notice remains recorded at the Register of Deeds' office, and that the Land-Use Restrictions are being complied with.**
- 5. No person conducting environmental assessment or remediation at the Property or involved in determining compliance with applicable land-use restrictions, at the direction of, or pursuant to a permit or order issued by DENR may be denied access to the Property for the purpose of conducting such activities.**

6. **The owner of any portion of the Property shall cause the instrument of any sale, lease, grant, or other transfer of any interest in the property to include a provision expressly requiring the lessee, grantee, or transferee to comply with this Notice. The failure to include such a provision shall not affect the validity or applicability of any land-use restriction in this Notice.**

EASEMENT (RIGHT OF ENTRY)

The property owner grants and conveys to DENR, its agents, contractors, and employees, and any person performing pollution remediation activities under the direction of DENR, access at reasonable times and under reasonable security requirements to the Property to determine and monitor compliance with the land-use restrictions set forth in this Notice. Such investigations and actions are necessary by DENR to ensure that use, occupancy, and activities of and at the Property are consistent with the land-use restrictions and to ensure that the structural integrity and continued effectiveness of any engineering controls (if appropriate) described in the Notice are maintained. Whenever possible, at least 48 hours advance notice will be given to the Property Owner prior to entry. Advance notice may not always be possible due to conditions such as response time to complaints and emergency situations.

REPRESENTATIONS AND WARRANTIES

The Property Owner hereby represents and warrants to the other signatories hereto:

- i) that the Property Owner is the sole owner of the Property; **or** that the Property Owner has provided to DENR the names of all other persons that own an interest in or hold an encumbrance on the Property and have notified such persons of the Property Owner's intention to enter into this Notice;
- ii) that the Property Owner has the power and authority to enter into this Notice, to grant the rights and interests herein provided and to carry out all obligations hereunder; and
- iii) that this Notice will not materially violate or contravene or constitute a material default under any other agreement, document or instrument to which the Property Owner is a party or by which the Property Owner may be bound or affected.

ENFORCEMENT

The above land-use restrictions shall be enforceable without regard to lack of privity of estate or contract, lack of benefit to particular land, or lack of any property interest in particular land. The land-use restrictions shall be enforced by any owner of the Property. The land-use restrictions may also be enforced by DENR through the remedies provided in NCGS § 143-215.104P or by means of a civil action; by any unit of local government having jurisdiction over any part of the Property; and by any person eligible for liability protection under the DSCA who

will lose liability protection if the restrictions are violated. Any attempt to cancel any or all of this Declaration without the approval of the Secretary of DENR (or its successor in function), or his/her delegate, shall be subject to enforcement by DENR to the full extent of the law. Failure by any party required-or authorized to enforce any of the above restrictions shall in no event be deemed a waiver of the right to do so thereafter as to the same violation or as to one occurring prior or subsequent thereto.

If a land-use restriction set out in this Notice required under NCGS § 143-215.104.M is violated, the owner of the Property at the time the land-use restriction is violated, the owner's successors and assigns, and the owner's agents who direct or contract for alteration of the contamination site in violation of a land-use restriction shall be liable for remediation of all contaminants to unrestricted use standards.

FUTURE SALES, LEASES, CONVEYANCES AND TRANSFERS

When any portion of the Property subject to this Notice is sold, leased, conveyed or transferred, the deed or other instrument of transfer shall contain in the description section, in no smaller type than that used in the body of the deed or instrument, (1) a statement that the property has been contaminated with dry-cleaning solvent and, if appropriate, cleaned up under the Act and (2) a reference by book and page to the recordation of this Notice.

The Property Owner shall notify DENR within fourteen (14) calendar days of the effective date of any conveyance, grant, gift, or other transfer, whole or in part, of the Property Owner's interest in the Property. This notification shall include the name, business address and phone number of the transferee and the expected date of transfer.

The Property Owner shall notify DENR within thirty (30) days following the petitioning or filing of any document by any person initiating a rezoning of the Property that would change the base zone of the Property.

PROPERTY OWNER SIGNATURE

IN WITNESS WHEREOF, Property Owner has caused this instrument to be duly executed this ___ day of _____, 20__.

Benchmark Square Properties, LLC

By:

Name of contact

STATE OF _____
COUNTY OF _____

I, _____, a Notary Public of the county and state aforesaid, certify that _____ personally came before me this day and acknowledged that he/she is a Member of Benchmark Square Properties, LLC, a North Carolina limited liability corporation, and its Manager, and that by authority duly given and as the act of the company, the foregoing Notice of Dry-Cleaning Solvent Remediation was signed in its name by him.

WITNESS my hand and official stamp or seal, this ___ day of _____, 20__.

Name typed or printed
Notary Public

My Commission expires: _____
[Stamp/Seal]

APPROVAL AND CERTIFICATION

The foregoing Notice of Dry-Cleaning Solvent Remediation is hereby approved and certified.

North Carolina Department of Environment and Natural Resources

By: _____ Date _____
Jim Bateson, LG
Chief, Superfund Section
Division of Waste Management

LIMITED POWER OF ATTORNEY

I _____ “Property Owner”, do hereby grant a limited power of attorney to DENR and to DENR’s independent contractors, as follows:

DENR and DENR’s independent contractors shall have the limited power of attorney to record this Notice, including its documentary and survey plat components, in accordance with N.C.G.S. § 143-215.104M on my “Property Owner” behalf. This limited power of attorney shall terminate upon completion of the recordation of the Notice.

Signature of Property Owner _____

Dated this ____ day of _____ 20 ____.

STATE OF _____
COUNTY OF _____

I, _____, a Notary Public, do hereby certify that _____ personally appeared before me this day and signed this “Limited Power of Attorney”.

WITNESS my hand and official stamp or seal, this ____ day of _____, 20 ____.

Name typed or printed
Notary Public

My Commission expires: _____
[Stamp/Seal]

EXHIBIT A
REDUCTION OF SURVEY PLAT

EXHIBIT B
PROPERTY LEGAL DESCRIPTION

All of lot 3A, containing 6.269 acres more or less, as shown on the Final Plat for Benchmark Properties, Inc. recorded in Plat Book 128, Page 127 in the office of the Register of Deeds of Guilford County, North Carolina.

APPENDIX D

EXAMPLE ANNUAL CERTIFICATION OF LAND-USE RESTRICTIONS

Annual Certification of Land-Use Restrictions

Site Name: Former U.S. \$1.75 Cleaners
Site Address: 2900 Randleman Road, Greensboro, Guilford County, NC
DSCA ID No: 41-0003

ANNUAL CERTIFICATION of LAND-USE RESTRICTIONS

Pursuant to Condition #4 in the Notice of Dry-Cleaning Solvent Remediation (Notice) signed by Benchmark Square Properties, LLC and recorded in Deed Book <blank>, Page <blank> on <date> at the Guilford County Register of Deeds Office, Benchmark Square Properties, LLC hereby certifies, as an owner of at least part of the property that is the subject of the Notice, that the Notice remains recorded at the Guilford County Register of Deeds office and the land-use restrictions therein are being complied with.

Duly executed this ____ day of _____, 20__.

Benchmark Square Properties, LLC

By: _____
Name typed or printed:

STATE OF NORTH CAROLINA
COUNTY OF _____

I, _____, a Notary Public of the county and state aforesaid, certify that _____ personally came before me this day and the foregoing certification was signed by him/her.

WITNESS my hand and official stamp or seal, this ____ day of _____, 20__.

Name typed or printed:
Notary Public

My Commission expires: _____
[Stamp/Seal]

APPENDIX E

EXAMPLE DOCUMENTS ANNOUNCING THE PUBLIC COMMENT PERIOD



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

<Date>

Denise Turner Roth
City Manager
Melvin Municipal Office Building
300 W. Washington Street
Greensboro, NC 27401

Subj: Remediation of Dry-Cleaning Solvent Contamination
DSCA Site # 41-0003
Former U.S. \$1.75 Cleaners
2900 Randleman Road, Greensboro

Dear Denise Turner Roth:

The Dry-Cleaning Solvent Cleanup Act of 1997 (DSCA), North Carolina General Statutes (N.C.G.S.) Sections 143-215.104A through 143-215.104U, provides for the assessment and remediation of properties that may have been or were contaminated by chlorinated solvents. To satisfy the requirements of N.C.G.S. 143-215.104L, this letter serves as the **Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site** (NOI) approved by the North Carolina Department of Environment and Natural Resources (DENR).

The NOI must provide, to the extent known, a legal description of the location of the DSCA Site, a map showing the location of the DSCA Site, a description of the contaminants involved and their concentrations in the media of the DSCA Site, a description of the intended future use of the DSCA Site, any proposed investigation and remediation, and a proposed Notice of Dry-Cleaning Solvent Remediation (NDCSR) prepared in accordance with N.C.G.S. Section 143-215.104M. The required components of the NOI are included in the attached Risk Management Plan, and are available on our website at www.ncdscs.org, under "Public Notices" during the public comment period.

The DSCA Program is providing a copy of the NOI to all local governments having jurisdiction over the DSCA Site. A 30-day public comment period is being held from <date>, until <date>. Written comments may be submitted to DENR no later than <date>. Written requests for a public meeting may be submitted to DENR no later than <date>. All such comments and requests should be sent to:

Delonda Alexander, DSCA Remediation Unit
Division of Waste Management, NC DENR
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Remediation of Dry-Cleaning Solvent Contamination
DSCA Site # 41-0003
Former U.S. \$1.75 Cleaners, 2900 Randleman Road, Greensboro
Page 2

<date>

A Summary of the NOI is being published in the Greensboro News & Record, copies are being sent to owners of property within and contiguous with the area of contamination, and a copy of the Summary will be conspicuously posted at the Site during the public comment period.

If you have any questions, please feel free to contact me at (919)707-8365.

Sincerely,

Delonda Alexander, Unit Supervisor
DSCA Remediation Unit
delonda.alexander@ncdenr.gov

Attachments: Risk Management Plan

Cc: DSCA Site # 41-0003 File



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

<Date>

Marty Lawing
County Manager
301 West Market Street
PO Box 3427
Greensboro, NC 27402

Subj: Remediation of Dry-Cleaning Solvent Contamination
DSCA Site # 41-0003
Former U.S. \$1.75 Cleaners
2900 Randleman Road, Greensboro

Dear Marty Lawing:

The Dry-Cleaning Solvent Cleanup Act of 1997 (DSCA), North Carolina General Statutes (N.C.G.S.) Sections 143-215.104A through 143-215.104U, provides for the assessment and remediation of properties that may have been or were contaminated by chlorinated solvents. To satisfy the requirements of N.C.G.S. 143-215.104L, this letter serves as the **Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site** (NOI) approved by the North Carolina Department of Environment and Natural Resources (DENR).

The NOI must provide, to the extent known, a legal description of the location of the DSCA Site, a map showing the location of the DSCA Site, a description of the contaminants involved and their concentrations in the media of the DSCA Site, a description of the intended future use of the DSCA Site, any proposed investigation and remediation, and a proposed Notice of Dry-Cleaning Solvent Remediation (NDCSR) prepared in accordance with N.C.G.S. Section 143-215.104M. The required components of the NOI are included in the attached Risk Management Plan, and are available on our website at www.ncdscs.org, under "Public Notices" during the public comment period.

The DSCA Program is providing a copy of the NOI to all local governments having jurisdiction over the DSCA Site. A 30-day public comment period is being held from <date>, until <date>. Written comments may be submitted to DENR no later than <date>. Written requests for a public meeting may be submitted to DENR no later than <date>. All such comments and requests should be sent to:

Delonda Alexander, DSCA Remediation Unit
Division of Waste Management, NC DENR
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Remediation of Dry-Cleaning Solvent Contamination
DSCA Site # 41-0003
Former U.S. \$1.75 Cleaners, 2900 Randleman Road, Greensboro
Page 2

<date>

A Summary of the NOI is being published in the Greensboro News & Record, copies are being sent to owners of property within and contiguous with the area of contamination, and a copy of the Summary will be conspicuously posted at the Site during the public comment period.

If you have any questions, please feel free to contact me at (919)707-8365.

Sincerely,

Delonda Alexander, Unit Supervisor
DSCA Remediation Unit
delonda.alexander@ncdenr.gov

Attachments: Risk Management Plan

Cc: DSCA Site # 41-0003 File



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

<Date>

Merle C. Green
Health Director
1203 Maple Street
Greensboro, NC 27405

Subj: Remediation of Dry-Cleaning Solvent Contamination
DSCA Site # 41-0003
Former U.S. \$1.75 Cleaners
2900 Randleman Road, Greensboro

Dear Merle C. Green:

The Dry-Cleaning Solvent Cleanup Act of 1997 (DSCA), North Carolina General Statutes (N.C.G.S.) Sections 143-215.104A through 143-215.104U, provides for the assessment and remediation of properties that may have been or were contaminated by chlorinated solvents. To satisfy the requirements of N.C.G.S. 143-215.104L, this letter serves as the **Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site** (NOI) approved by the North Carolina Department of Environment and Natural Resources (DENR).

The NOI must provide, to the extent known, a legal description of the location of the DSCA Site, a map showing the location of the DSCA Site, a description of the contaminants involved and their concentrations in the media of the DSCA Site, a description of the intended future use of the DSCA Site, any proposed investigation and remediation, and a proposed Notice of Dry-Cleaning Solvent Remediation (NDCSR) prepared in accordance with N.C.G.S. Section 143-215.104M. The required components of the NOI are included in the attached Risk Management Plan, and are available on our website at www.ncdsca.org, under "Public Notices" during the public comment period.

The DSCA Program is providing a copy of the NOI to all local governments having jurisdiction over the DSCA Site. A 30-day public comment period is being held from <date>, until <date>. Written comments may be submitted to DENR no later than <date>. Written requests for a public meeting may be submitted to DENR no later than <date>. All such comments and requests should be sent to:

Delonda Alexander, DSCA Remediation Unit
Division of Waste Management, NC DENR
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Remediation of Dry-Cleaning Solvent Contamination
DSCA Site # 41-0003
Former U.S. \$1.75 Cleaners, 2900 Randleman Road, Greensboro
Page 2

<date>

A Summary of the NOI is being published in the Greensboro News & Record, copies are being sent to owners of property within and contiguous with the area of contamination, and a copy of the Summary will be conspicuously posted at the Site during the public comment period.

If you have any questions, please feel free to contact me at (919)707-8365.

Sincerely,

Delonda Alexander, Unit Supervisor
DSCA Remediation Unit
delonda.alexander@ncdenr.gov

Attachments: Risk Management Plan

Cc: DSCA Site # 41-0003 File



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

<Date>

<property owner>
<mailing address>
<city, state, zip>

Subj: Dry-Cleaning Solvent Contamination at 2900 Randleman Road
Greensboro, NC

Dear <property owner>:

You are receiving this letter because your property at <adjacent property address> is adjacent to an area contaminated with dry-cleaning solvents. The Dry-Cleaning Solvent Clean-up Act (DSCA) Program has completed an assessment of the dry-cleaning solvent contamination associated with the former U.S. \$1.75 Cleaners at 2900 Randleman Road in Greensboro. The tenant space is currently vacant. A remedial strategy to address the site contamination has been prepared, and in accordance with our program's statutes, the community has an opportunity to review and comment on the proposed strategy.

The attached Summary of the Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site (NOI) provides a brief description of the proposed remedy, a web link to the complete NOI, and the dates and procedures for commenting on the proposed remedy. If you do not have access to the internet, we ask that you contact us to request a hard copy of the complete NOI.

If you have questions, please contact me at (919) 707-8365.

Sincerely,

Delonda Alexander, Unit Supervisor
DSCA Remediation Unit
delonda.alexander@ncdenr.gov

Attachments: Summary of the NOI

Cc: DSCA Site # 41-0003 File

Public Notice

SUMMARY OF NOTICE OF INTENT TO REMEDIATE A DRY-CLEANING SOLVENT FACILITY OR ABANDONED SITE

Former U.S. \$1.75 Cleaners
DSCA Site # 41-0003

Pursuant to N.C.G.S. §143-215.104L, on behalf of Benchmark Square Properties, LLC, the North Carolina Department of Environment and Natural Resources' (DENR's) private contractor has prepared a Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site (NOI). The purpose of this Summary of the NOI is to notify the community of the proposed remedy for the contamination site and invite comment on the proposed remedy.

U.S. \$1.75 Cleaners formerly conducted dry-cleaning operations at the Benchmark Square shopping center at 2900 Randleman Road, in Greensboro, North Carolina. The tenant space is currently vacant. Dry-cleaning solvent contamination in soil and ground water has been identified at the following parcel:

Benchmark Square, 2900 Randleman Road, in Greensboro; Parcel No. 7862158754

An investigation of the extent of contamination has been completed. A risk assessment of the contaminated property concluded that the contamination poses no unacceptable risks. A Risk Management Plan has been prepared which proposes using land-use controls to prevent current and future risks at the affected property.

The elements of the complete NOI are included in the Risk Management Plan (RMP) which is available online at <http://portal.ncdenr.org/web/wm/DSCA/PublicNotices>.

The public comment period begins _____, 20__, and ends _____, 20__.

Comments must be in writing and submitted to DENR no later than _____, 20__. Written requests for a public meeting may be submitted to DENR no later than _____, 20__. Requests for additional information should be directed to Delonda Alexander at (919) 707-8365.

All comments and requests should be sent to:

Delonda Alexander, DSCA Remediation Unit
Division of Waste Management, NC DENR
1646 Mail Service Center
Raleigh, North Carolina 27699-1646