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August 28, 2008

Mr. Billy Meyer
State of North Carolina
Department of Environment and Natural Resources
Division of Waste Management, Superfund Section
401 Oberlin Road, Suite 150
Raleigh, North Carolina 27605

RE: Risk Management Plan
Union Road Cleaners
Union Hudson Crossing Shopping Center
2210 Union Road, Space #1
Gastonia, Gaston County, North Carolina
ATC Project No. 45.34341.3604
DSCA Site Identification No. 36-0004

Dear Mr. Meyer:

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 indicated 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.

A handwritten signature in blue ink, appearing to read 'Steven M. Aldis'.

Steven M. Aldis, P.G.
Project Manager

A handwritten signature in blue ink, appearing to read 'Genna K. Olson'.

Genna K. Olson, P.G.
Program Manager

**RISK MANAGEMENT PLAN
UNION ROAD CLEANERS
UNION HUDSON CROSSING SHOPPING CENTER
2210 UNION ROAD, SPACE 1
GASTONIA, GASTON COUNTY, NORTH CAROLINA
ATC PROJECT NO. 45.34341.3604
DSCA SITE IDENTIFICATION NO. 36-0004
AUGUST 28, 2008**

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Union Road Cleaners
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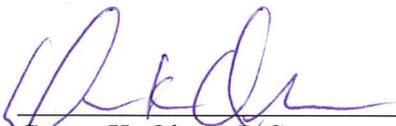
Prepared By:

Submitted To:

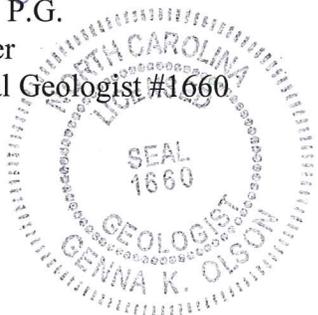
**North Carolina Department of Environment
and Natural Resources**
Division of Waste Management
Superfund Section – DSCA Program
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Steven M. Aldis, P.G.
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August 28, 2008

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1.0 INTRODUCTION

ATC Associates of North Carolina, P.C. (ATC) has prepared this Risk Management Plan (RMP) for the Union Road Cleaners site on behalf of the North Carolina Drycleaning Solvent Cleanup Act (DSCA) Program. The site is located in the Union Hudson Crossing Shopping Center at 2210 Union Road, Space #1 in Gastonia, Gaston 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 a Risk Assessment Report for the Union Road Cleaners site on April 9, 2008. The results of the Tier 1 and Tier 2 risk assessment indicated that the site-wide risks do not exceed target risk levels. However, the evaluation was based on site-specific land-use conditions that require an RMP. As such, 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

The most recent Risk Assessment Report was completed by ATC on April 9, 2008. Note that a previous Risk Assessment Report was completed on December 7, 2007, but was updated following excavation of impacted soil as described in Section 4.1. This section summarizes the final risk assessment which resulted in the recommendation for no further action status for the site.

The first step in the risk assessment process consisted of development of an exposure model. The exposure model evaluation indicated the following complete exposure pathways for the site:

- On-site non-residential worker - indoor inhalation of vapors from subsurface soil, outdoor inhalation of vapors from subsurface soil, indoor inhalation of vapors from groundwater, and outdoor inhalation of vapors from groundwater.
- On-site construction worker - combined pathways for soil up to depth of construction, and outdoor inhalation of vapors from groundwater.
- Off-site non-residential worker - indoor inhalation of vapors from groundwater, and outdoor inhalation of vapors from groundwater for future off-site uses.
- Off-site non-residential worker - combined pathways for outdoor inhalation of vapors from groundwater.

In addition to the above referenced pathways, ATC also evaluated the Protection of Groundwater Use pathway. For this pathway, ATC assumed that the nearest potential point-of-exposure (POE) for groundwater was at the downgradient property boundary, approximately 220 feet east-southeast of the source area. The nearest surface water body is an unnamed intermittent stream approximately 820 feet from the subject site. Based on this distance and the small size of the plume associated with the subject site, the Protection of Surface Water pathway was deemed incomplete.

As part of the Tier 1 evaluation, site-specific representative concentrations (RCs) were calculated for each complete exposure pathway and compared to the Tier 1 Risk-Based Screening Levels (RBSLs) established by the DSCA Program. The results of this comparison indicated that PCE and trichloroethylene (TCE) subsurface soil concentrations exceeded the Tier 1 RBSLs for indoor inhalation of vapors by on-site non-residential worker. As such, ATC proceeded with a Tier 2 evaluation.

As part of the Tier 2 evaluation, site-specific fate and transport parameters and site-specific RCs for each complete exposure pathway were entered into the North Carolina Risk-Based Corrective Action (RBCA) Computational Software distributed by the DSCA Program. The results of the Tier 2 evaluation indicated that the cumulative site-wide risk does not exceed the allowable risk established by DSCA. Based on the results of the Tier 2 evaluation, ATC concluded that the

release at the subject site does not pose an unacceptable risk and recommended site closure in accordance with the DSCA Program's risk-based rules.

4.0 RAP COMPONENTS

4.1 Summary of Prior Assessment and Interim Actions

The site property is approximately 8.65 acres in size and contains the Union Hudson Crossing Shopping Center. The Union Road Cleaners operated in the southeast corner of the shopping center building from 1997 through 2005. A Phase I Environmental Site Assessment was prepared for the site property by Epic Consulting Inc. on February 10, 2006. This due diligence report identified the former Union Road Cleaners as a recognized environmental condition and recommended a Phase II Assessment.

A Phase II Assessment report was subsequently prepared by Shield Engineering Inc. on March 23, 2006. Only a portion of the report was available in the DSCA Program's files. Two soil borings were advanced to a depth of 4 feet. Boring B-1 (referred to as PV-1 in this report) was advanced near chemical drums stored in the boiler room, and boring B-2 (referred to as PV-2 in this report) was advanced near the dry-cleaning machine. Concentrations of PCE and TCE were detected in soil samples from each of the borings.

Following confirmation of a release, the property owner, Union Road II, Limited Partnership (LP), submitted a petitioner questionnaire on April 13, 2006, to request admittance of the site into the DSCA Program. The site was accepted into the program on May 9, 2006, and an Assessment and Remediation Agreement was executed. Note that ownership of the site property subsequently changed from Union Road II, LP to PP-Hudson, LLC on August 20, 2007.

On October 5, 2006, a Prioritization Assessment Report (PAR) was prepared by ATC on behalf of the DSCA Program. The scope of work performed for the PAR included a site reconnaissance, receptor survey, and collection of soil and/or groundwater samples from direct-push/hand auger borings B-1 through B-11. The extent of impacted soil and groundwater were delineated

horizontally during the PA investigation and appeared limited to the area immediately below and downgradient of the dry-cleaning facility. The extent of impacted groundwater did not appear to have migrated off-site and did not appear likely to impact potential receptors.

On September 21, 2007, ATC completed a Conceptual Site Model (CSM) report on behalf of the DSCA Program. The scope of work performed for the CSM included installation of four shallow monitoring wells (MW-1 through MW-4) and one deep monitoring well (MW-1D) and completion of a groundwater sampling event. The horizontal extent of impacted soil appeared adequately delineated from prior sampling rounds. As such, no additional characterization of the extent of impacted soil was performed during the CSM investigation. However, two Shelby tube samples were collected to describe the physical characteristics of the soil in preparation for possible future risk assessment activities. The Shelby tube data was utilized during later Tier 2 risk assessment activities. The conclusions of the CSM were similar to those in the PAR, and indicated the extent of impacted soil and groundwater appeared delineated, confined to the site property, and unlikely to impact area receptors.

Quarterly monitoring of the five existing monitoring wells was initiated upon completion of assessment activities. After the initial sampling event in December 2006, three additional sampling events were completed in August 2007, November 2007, and February 2008. The results of the sampling events were documented in the CSM and subsequent reports discussed below.

ATC completed an initial Risk Assessment Report for the site on December 7, 2007. The results of the risk assessment indicated that additional action was warranted to address PCE concentrations in soil in order to prevent groundwater impacts at the point of exposure 220 feet from the source. In response, ATC completed excavation of approximately 68 tons of impacted soil during the time period from January 25 through February 8, 2008. The goal of the excavation was to reduce representative concentrations of PCE in soil to below 1.64 milligrams per kilogram (mg/kg), which was the value calculated to be protective of groundwater use. Based on this excavation goal, ATC proposed to excavate soil to a depth of approximately 8 feet below ground

surface (bgs) in the vicinity of historical samples PV-2, B-3, and B-4. Based on field indications of impact, ATC's actual excavation area also encompassed historical sample PV-1.

Following the soil excavation activities, ATC collected six soil samples from the sidewalls (EX-1, EX-2, EX-4, EX-5, and EX-6) and base (EX-3) of the excavation. Upon receipt of the laboratory results, ATC recalculated representative concentrations for impacted soil. The results of these calculations indicated that the excavation goal had been reached. The excavated soil was characterized as non-hazardous (in accordance with the NC Hazardous Waste Section's "Contained-In" Policy") based on laboratory analytical data and transported off-site for disposal at Republic Services, Inc. Foothills Environmental Landfill in Lenoir, North Carolina.

Upon completion of the soil excavation and the fourth groundwater monitoring event in February 2008, ATC prepared an updated Risk Assessment Report dated June 23, 2008. As discussed in Section 3.0, the results of the risk assessment indicated that the remaining contamination does not pose an unacceptable risk as long as the land use restrictions are implemented at the site.

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. Since these conditions were met via the interim remedial action described in Section 4.1, land use restrictions and no further remedial action are recommended for the site.

Condition 1: The dissolved plume is stable or decreasing.

A total of four groundwater monitoring events have been conducted for wells MW-1 through MW-4 and MW-1D in December 2006, August 2007, November 2007, and February 2008. Constituents detected in groundwater samples collected from the site historically include benzene, chloroform, ethylbenzene, methyl tertiary butyl ether (MTBE), naphthalene, PCE, toluene, TCE, vinyl chloride, xylenes, acetone, 2-butanone, 4-methyl-2-pentanone, bromodichloromethane, carbon disulfide, chloromethane, methylene chloride, diisopropyl ether,

2-hexanone, and chloroethane. Of these constituents, only benzene, PCE, TCE, vinyl chloride, and bromodichloromethane were detected at concentrations exceeding Title 15A NCAC 2L .0202 Groundwater Standards (2L Standards). Bromodichloromethane is typically associated with drinking water chlorination and is likely associated with the city water used for decontamination and drilling operations. Benzene was detected only one time in one monitoring well and is therefore considered an outlier. Based on these data, ATC focused on the compounds PCE, TCE, and vinyl chloride as constituents of concern (COCs) for evaluation of plume stability.

PCE and TCE have been detected in source area monitoring well MW-1 during each of the four sampling events conducted. ATC prepared a concentration versus distance graph for sampling events conducted at the site. A slight increase in contaminant concentrations was observed in February 2008 as compared to the prior three sampling events. However, the February sampling event was conducted immediately following soil excavation, and mobilization of some contaminants following excavation is a common occurrence. Since source removal has been conducted in the area, contaminant concentrations are expected to reduce during future sampling events. Vinyl chloride was detected in deep well MW-1D during the first and third sampling events, but concentrations appear stable and are not increasing. No COCs were detected above 2L Standards in the upgradient monitoring well or the downgradient monitoring wells during any of the four sampling events. Based on these data, ATC concludes that the size of the plume is stable and concentrations in the source area are likely to decrease due to the recent source removal activities.

Documentation of the plume stability evaluation, including a figure showing monitoring well locations, a table showing historical groundwater analytical data, and a concentrations versus distance graph is 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 RC of that COC.

ATC evaluated the RCs calculated during the Tier 1 Evaluation and found that this condition has been met for all COCs and exposure pathways with one minor exception. For the indoor inhalation of vapors from subsurface soils by an on-site non residential worker pathway, the maximum concentration of PCE is 10.36 times the representative concentration.

The DSCA RBCA guidance indicates that this condition can still be met if the exceedence can be adequately justified. The primary purpose of Condition 2 is to ensure that the exposure domain has been adequately assessed and no further characterization is warranted. The sample with the exceedence is post-excavation soil sample EX-2, which contained PCE at 2.82 mg/kg. This sample was collected from the southern sidewall of the excavation in an area where further excavation could not be easily performed without potentially impairing the structural stability of the building. Sufficient sampling has been conducted in the vicinity of this sample to show the sample was collected from a small hot spot of impacted soil and widespread impact at this concentration is not present. The sample does not appear to indicate that additional characterization is warranted. Based on the sampling data and only minimal exceedence of the 10 times requirement, ATC considers Condition 2 to have been adequately met for the site.

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.

The risk assessment for the site was based on land-use conditions that the usage of the site property will remain industrial/commercial and that groundwater will not be utilized on the property. As discussed in Section 6.0, land use restrictions (LUR) will be implemented for the site property to ensure that these assumptions remain valid.

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 land-use restrictions on the site property.

5.0 DATA COLLECTED DURING RMP IMPLEMENTATION

No further sampling or other data collection activities are proposed for the site. As such, this section is not applicable.

6.0 LAND-USE RESTRICTIONS (LUR)

The risk assessment for the site was based on assumptions that usage of the site property will remain industrial/commercial and that groundwater will not be utilized on the property. LUR will be implemented for the site property to ensure that land-use conditions are maintained and monitored until the LUR is no longer required for the site. A Notice of Dry-Cleaning Solvent Remediation (NDCSR) was prepared for the site to comply with the LUR requirement. The NDCSR is included in *Appendix C*. A plat showing the locations and types of dry-cleaning solvent contamination on the property is included as an exhibit to the NDCSR. The locations of dry-cleaning solvent contamination are where contaminants have been detected above unrestrictive use standards. As discussed in Section 4.2, PCE, TCE and vinyl chloride are the primary COCs for the site.

7.0 LONG-TERM STEWARDSHIP PLAN

The NDCSR contains a clause which requires that the owner of the site to submit notarized "Annual DSCA Land Use Restrictions Certification" to NCDENR on an annual basis certifying that the NDCSR remains recorded with the Register of Deeds and that land-use conditions have

not changed. An example of such a notice is included in *Appendix D*. Documents relating to this site will be maintained by NCDENR and available for public access.

8.0 RMP IMPLEMENTATION SCHEDULE

Since the contamination is stable and will be confined to the site property, and possible exposure to the contamination is managed through the NDCSR and LUR, no additional site remediation activities are required to implement the RMP. As such, upon completion of the public comment period and final approval of the RMP, the NDCSR will be filed with the Gaston 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 LUR have been executed and recorded with the Gaston County Register of Deeds. The NDCSR may, at the request of the property owner, be canceled by NCDENR after 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 the 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 LUR 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 and LUR 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.

Pursuant to N.C.G.S. 143-215.104K, if any of the LURs 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.

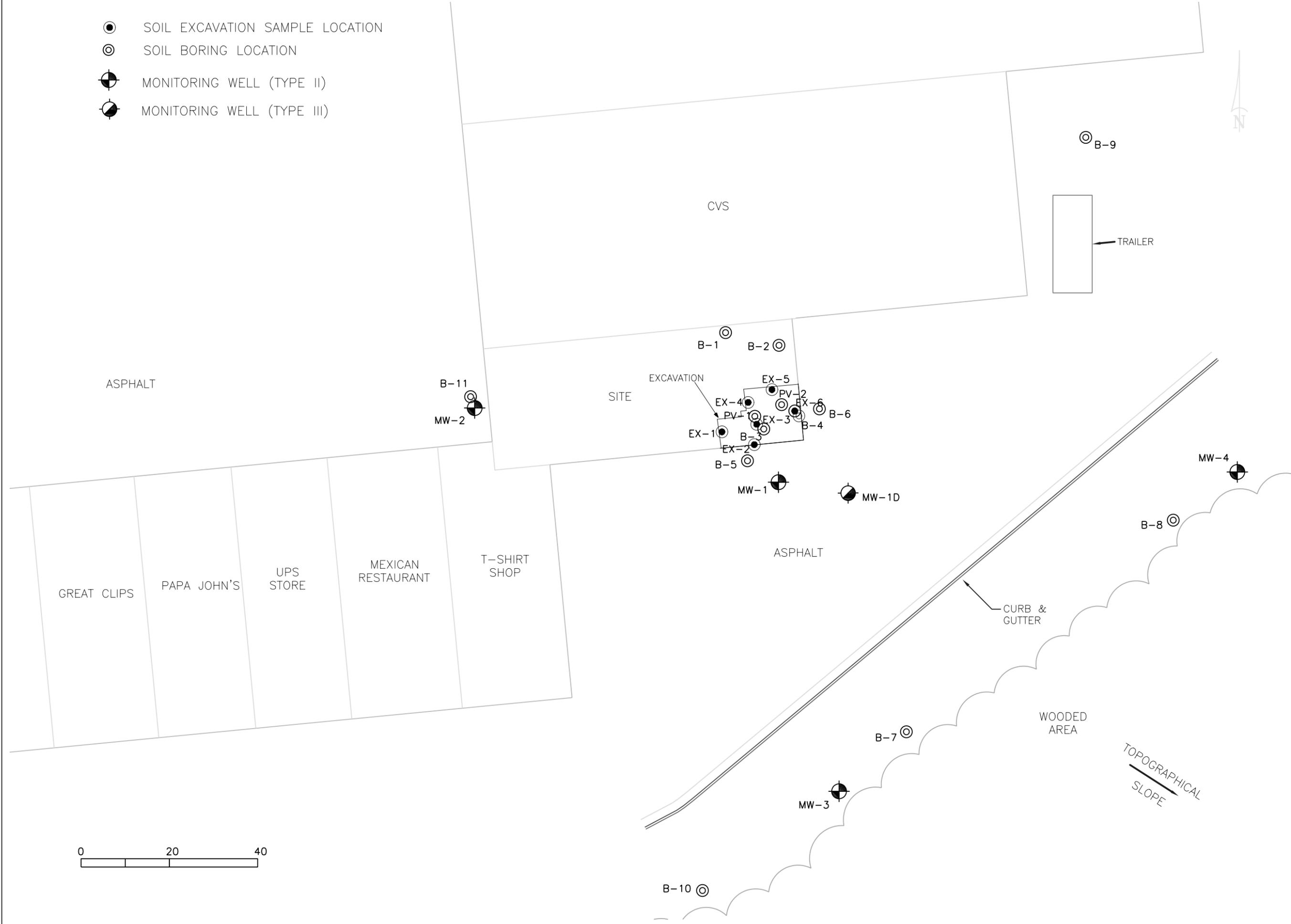
11.0 CONCLUSIONS AND RECOMMENDATIONS

ATC has prepared this RMP for the above referenced site on behalf of the NC DSCA Program. The results of a previous 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 and LUR 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

- SOIL EXCAVATION SAMPLE LOCATION
- ⊙ SOIL BORING LOCATION
- ⊕ MONITORING WELL (TYPE II)
- ⊖ MONITORING WELL (TYPE III)



VATC
 ASSOCIATES INC.
 Raleigh, North Carolina 27604 (919) 871-0999 FAX (919) 871-0335

PROJECT NO. 45.34341.3604
 DATE 3-3-08
 SCALE 1" = 20'

TITLE: SITE MAP SITE ID #36-0004
 UNION ROAD CLEANERS
 2210 UNION ROAD
 GASTONIA, NORTH CAROLINA

CAD FILE: 1253045
 TYPE CODE: SMA
 PREP. BY: SMA
 REV. BY: GO

NOTES:

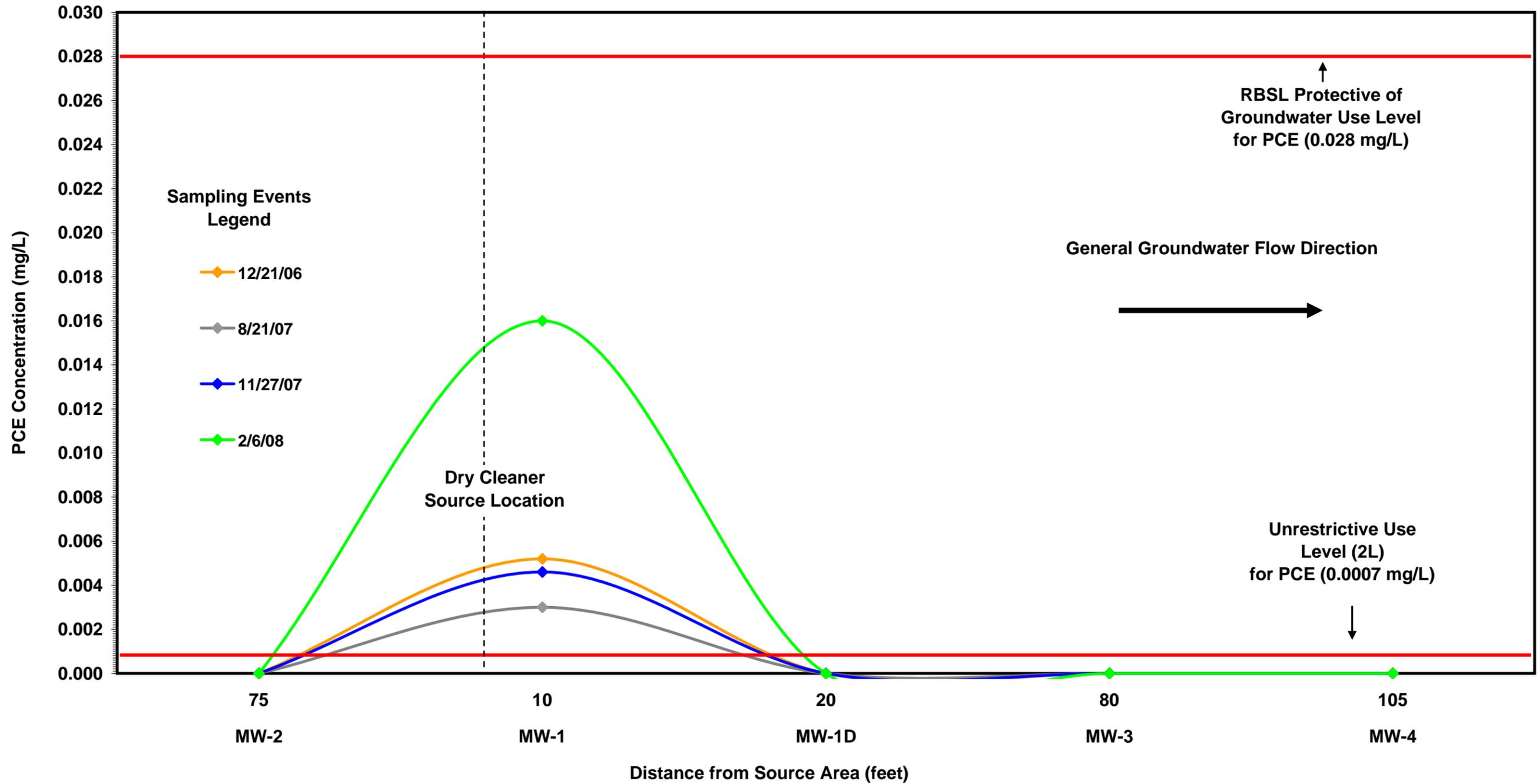
Table 1: Analytical Data for Groundwater

DSCA ID No.: 36-0004

Groundwater Sampling Point	Sampling Date (mm/dd/yy)	Benzene	Chloroform	Ethylbenzene	Methyl tert-butyl ether (MTBE)	Naphthalene	Tetrachloroethylene	Toluene	Trichloroethylene	Vinyl chloride	Xylenes (total)	Acetone	2-Butanone	4-Methyl-2-pentanone	Bromodichloromethane	Carbon Disulfide	Chloromethane	Methylene chloride	Diisopropyl ether	2-Hexanone	Chloroethane
(mg/L)																					
MW-1	12/21/06	0.0012J	<0.005	0.00027J	0.00046J	0.0038J	0.0052	0.00046J	0.0032J	<0.002	<0.005	0.018B	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-1	8/21/07	<0.005	<0.005	<0.005	<0.005	0.0026J	0.003J	<0.005	0.0024J	<0.010	<0.005	<0.010	<0.010	<0.010	<0.005	0.00062J	0.00067J	0.00051J	<0.005	<0.010	<0.010
MW-1	11/27/07	<0.005	<0.005	<0.005	<0.005	0.00028J	0.0046J	0.00033J	0.0034J	<0.010	<0.005	<0.010	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-1	2/6/08	<0.005	<0.005	<0.005	<0.005	<0.005	0.016	<0.005	0.0096	<0.010	<0.005	<0.010	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-2	12/21/06	<0.005	<0.005	<0.005	<0.005	0.0008J	<0.005	<0.005	<0.005	<0.002	<0.005	0.015B	0.0014J	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-2	8/21/07	<0.005	<0.005	<0.005	<0.005	0.0004J	<0.005	<0.005	<0.005	<0.010	<0.005	<0.010	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-2	11/27/07	<0.005	<0.005	<0.005	<0.005	0.00026J	<0.005	<0.005	<0.005	<0.010	<0.005	<0.010	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-2	2/6/08	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.005	<0.010	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-3	12/21/06	<0.005	<0.005	<0.005	<0.005	0.0004J	<0.005	<0.005	<0.005	<0.002	<0.005	0.018B	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-3	8/21/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.005	<0.010	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-3	11/27/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.005	<0.010	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	0.00025J	<0.010	<0.010
MW-3	2/6/08	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.005	0.012	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-4	12/21/06	<0.005	<0.005	<0.005	<0.005	0.00032J	<0.005	<0.005	<0.005	<0.002	<0.005	0.017B	<0.010	0.0016J	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-4	8/21/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.005	<0.010	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-4	11/27/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.005	<0.010	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-4	2/6/08	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	0.00037J	<0.010	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-1D	1/31/07	<0.005	0.025	<0.005	<0.005	<0.005	<0.005	0.023	<0.005	<0.002	<0.005	0.015	0.0033J	<0.010	0.00071J	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-1D	8/21/07	<0.005	0.0043J	<0.005	<0.005	<0.005	<0.005	0.0043J	<0.005	0.0026J	<0.005	0.035	0.0039J	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010
MW-1D	11/27/07	<0.005	0.0012J	<0.005	<0.005	<0.005	<0.005	0.0027J	<0.005	<0.010	<0.005	0.024	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	0.00082J	0.00066J
MW-1D	2/6/08	<0.005	0.0013J	<0.005	<0.005	<0.005	<0.005	0.0044J	<0.005	0.0024J	<0.005	0.019	0.0065J	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	0.00097J	0.00061J
2L Standards		0.001	0.07	0.55	0.2	0.021	0.0007	1	0.0028	0.000015	0.53	0.7	4.2	NE	0.00056	0.7	NE	0.0046	0.07	NE	2.8

- Notes:
1. Concentrations reported in milligrams per liter.
 2. Table shows constituents detected above laboratory method detection limits.
 3. "<" = Not detected above laboratory method detection limit.
 4. J = Laboratory estimated value between method detection limit and reporting limit.
 5. 2L Standards = Title 15A NCAC 2L .0202 Groundwater Standards.
 6. NE = No 2L Standard established.
 7. Concentrations shown in bold are above 2L Standards.

PCE Concentration vs. Distance Graph
Sampling Events - December 2006 through February 2008
Union Road Cleaners, Gastonia, Gaston County, North Carolina



APPENDIX B

LEVEL 1 ECOLOGICAL RISK ASSESSMENT CHECKLISTS

Appendix A
Ecological Risk Assessment – Level 1
Union Cleaners

2210 Union Road
Gastonia, Gaston County, North Carolina
ATC Project No: 45.34341.3604
DSCA ID: 36-0004

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

Based on the Gastonia Quadrangle Topographic map and the United States Fish and Wildlife Service (USFWS), Catawba Creek is located approximately 2,200 feet north of the site. In addition, Robinwood Lake is located approximately 2,400 feet east of the site. See the topographic map in **Attachment 1** and the USFWS Ecomap in **Attachment 2**.

2. Are there any water bodies anywhere on or within the one-half mile of the site?

Based on the Gastonia Quadrangle Topographic map and the USFWS, an unnamed pond is located approximately 850 feet southeast of the site and an unnamed intermittent stream is located approximately 820 feet east of the site.

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

Based on the USFWS Ecomap (**Attachment 3**), no marshes or swamps are located approximately one-half mile of the site.

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

Based on a review of the USFWS and NC Heritage online databases, no critical habitats or significant natural areas are located within one-half mile of the site.

5. 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.

6. 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?

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

7. 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 (MBTA) 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 Gaston County (e.g., Bald Eagle, Canadian Goose, Mourning Dove) are likely to be within one-half mile of the site.

8. 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, ecological and recreational species are likely to be present at the Robinwood Lake east of the site. No commercially important species were observed within one-half mile of the site.

9. Are there any threatened and/or endangered species (plant or animal) on or within one-half mile of the site?

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

- *Haliaeetus leucocephalus* – Bald Eagle: BGPA (Bald and Golden Eagle Protection Act)
- *Clemmys muhlenbergii* – Bog Turtle: Threatened
- *Helianthus schweinitzii* – Schweinitz's Sunflower : Endangered

ATC also reviewed the North Carolina Heritage online Gastonia Quadrangle species list. The quadrangle search indicated that no endangered or threatened species are located within the Gastonia South Quadrangle.

Checklist B

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

Yes. The primary constituents of concern for the site are tetrachloroethylene (PCE), trichloroethylene (TCE), and vinyl chloride. Based on published references [Environmental Protection Agency (EPA) and United States Agency for Toxic Substances and Disease Registry (ATSDR)], PCE, TCE, and vinyl chloride are leachable to groundwater and 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 (Fetter, 1988). Based on these values, PCE, TCE, and vinyl chloride are all mobile in groundwater.

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

Potential ecological receptor habitats identified in the site vicinity include surface water features located between 820 and 2,400 feet from the site property. 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 potential 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 ecological receptor habitats.

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

No. Impacted soil was excavated from the source area as an interim remedial measure and surficial impacted soil has not been identified outside the excavation area. Furthermore, the area is paved.

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

No. Surficial soils do not appear to be impacted and furthermore the area is paved.

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

No. Surficial soils do not appear to be impacted and furthermore the area is paved.

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

No. Surficial soils do not appear to be impacted and furthermore the area is paved.

3B. Are potential ecological receptors on the site.

No. Ecological receptors are unlikely to be present on the site property. Potential ecological receptor habitats identified in the site vicinity include surface water features located between 820 and 2,400 feet from the site property. Some sensitive bird and plant species were identified that may not be associated with surface water features, 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 soils do not appear to be impacted, the area is paved, and no ecological receptors are likely to be present in the area of the plume.

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. Surficial soils do not appear to be impacted and furthermore the area is paved.

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. Surficial soils do not appear to be impacted, the area is paved, and concentrations are sufficiently low such that significant volatilization from subsurface impacts to outdoor air appears unlikely.

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?

No. Surficial soils do not appear to be impacted and furthermore the area is paved.

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

No. Surficial soils do not appear to be impacted and furthermore the area is paved.

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. It is possible that migratory birds could be present in the site vicinity, but no vegetation is present in the area of the plume.

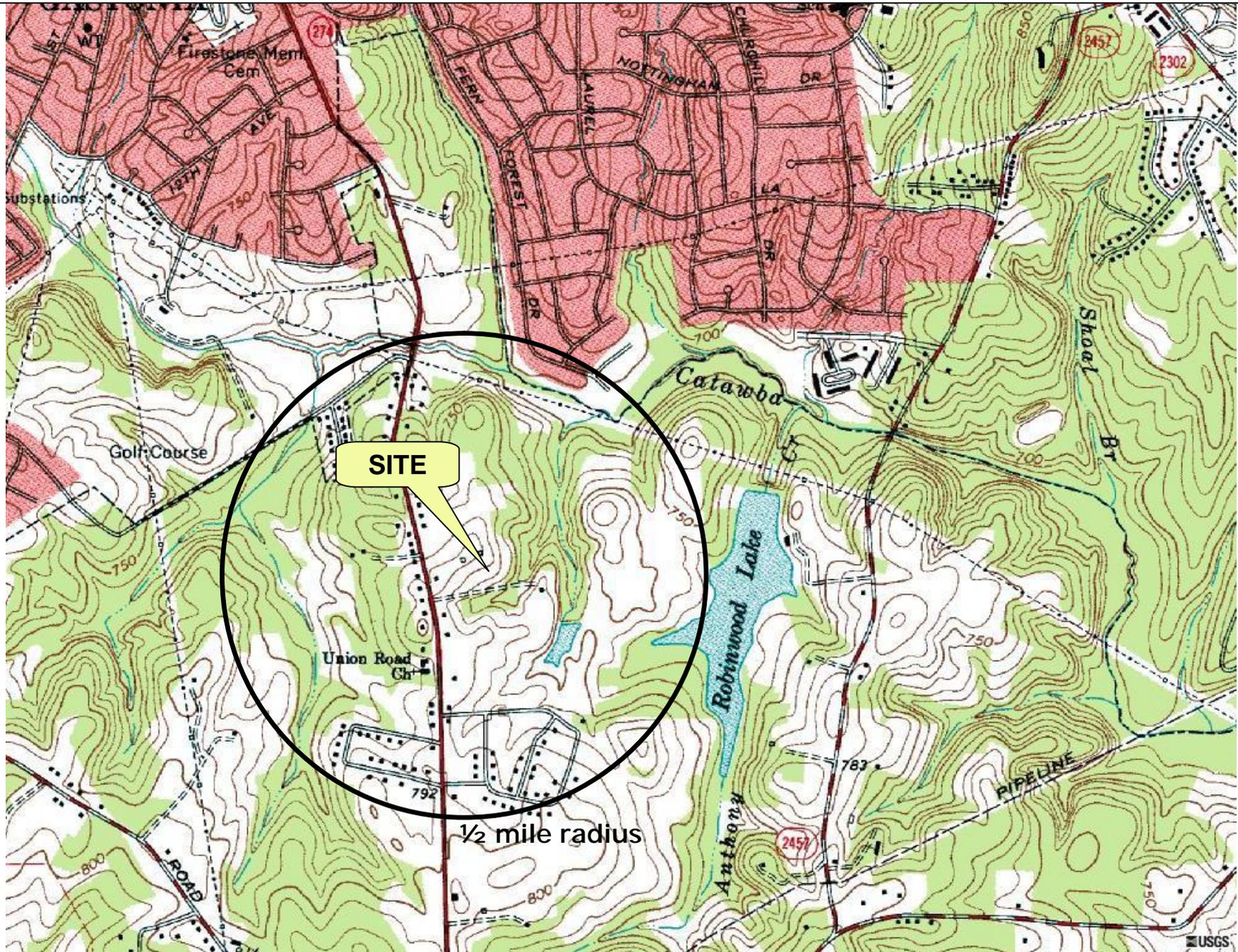
6D. Do chemicals found on the site bioaccumulate?

No. Based on published references (ATSDR), PCE, TCE, and vinyl chloride do not significantly bioaccumulate.

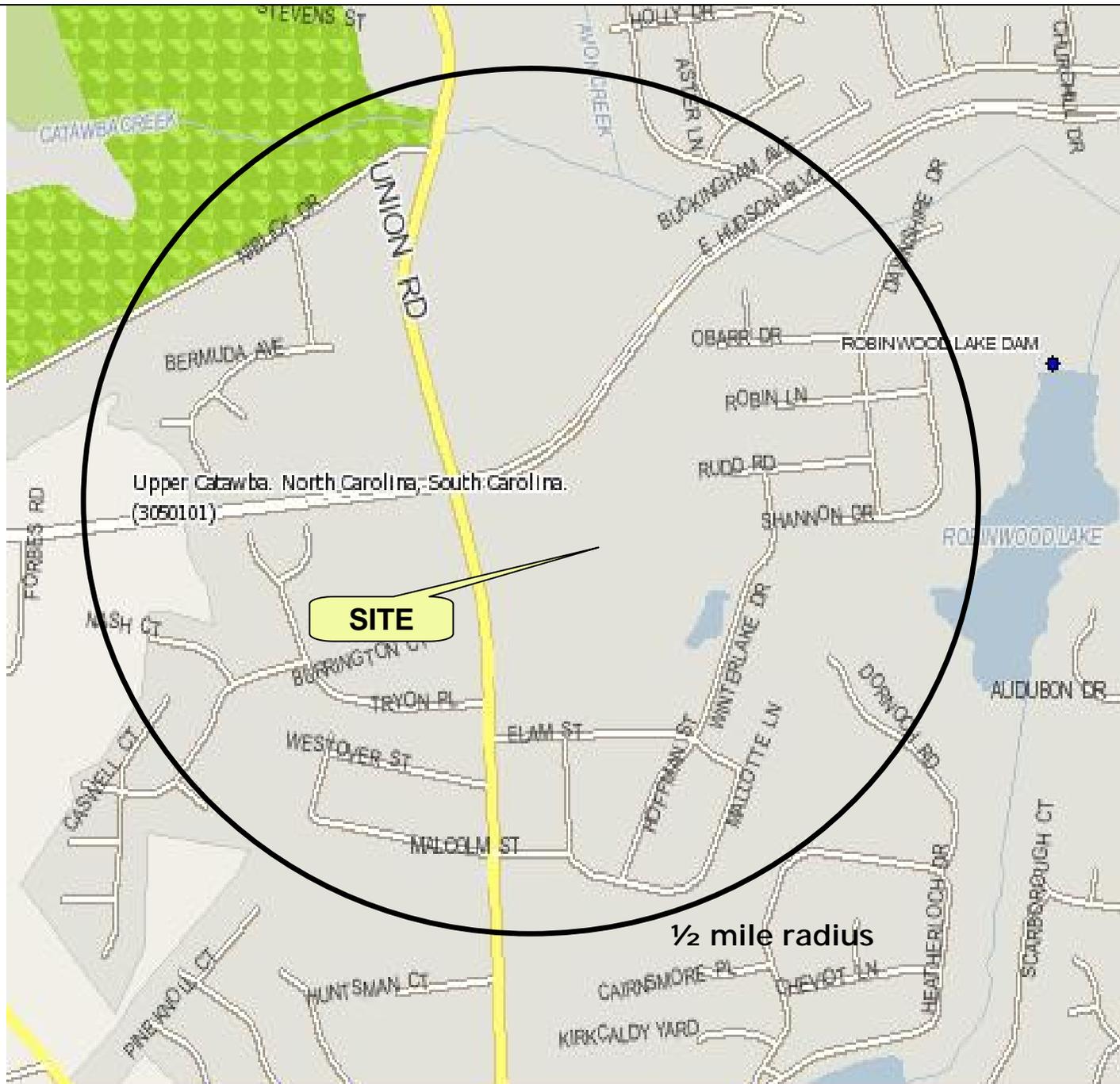
6. Could chemicals associated with the site reach ecological receptors through direct ingestion of soil, plants, animals, or contaminants?

No. Surficial soils do not appear to be impacted and the area is paved with no vegetation overlying the plume area.

Attachment 1: USGS Gastonia Quadrangle, 1996 (Not to Scale). Terraserver.com

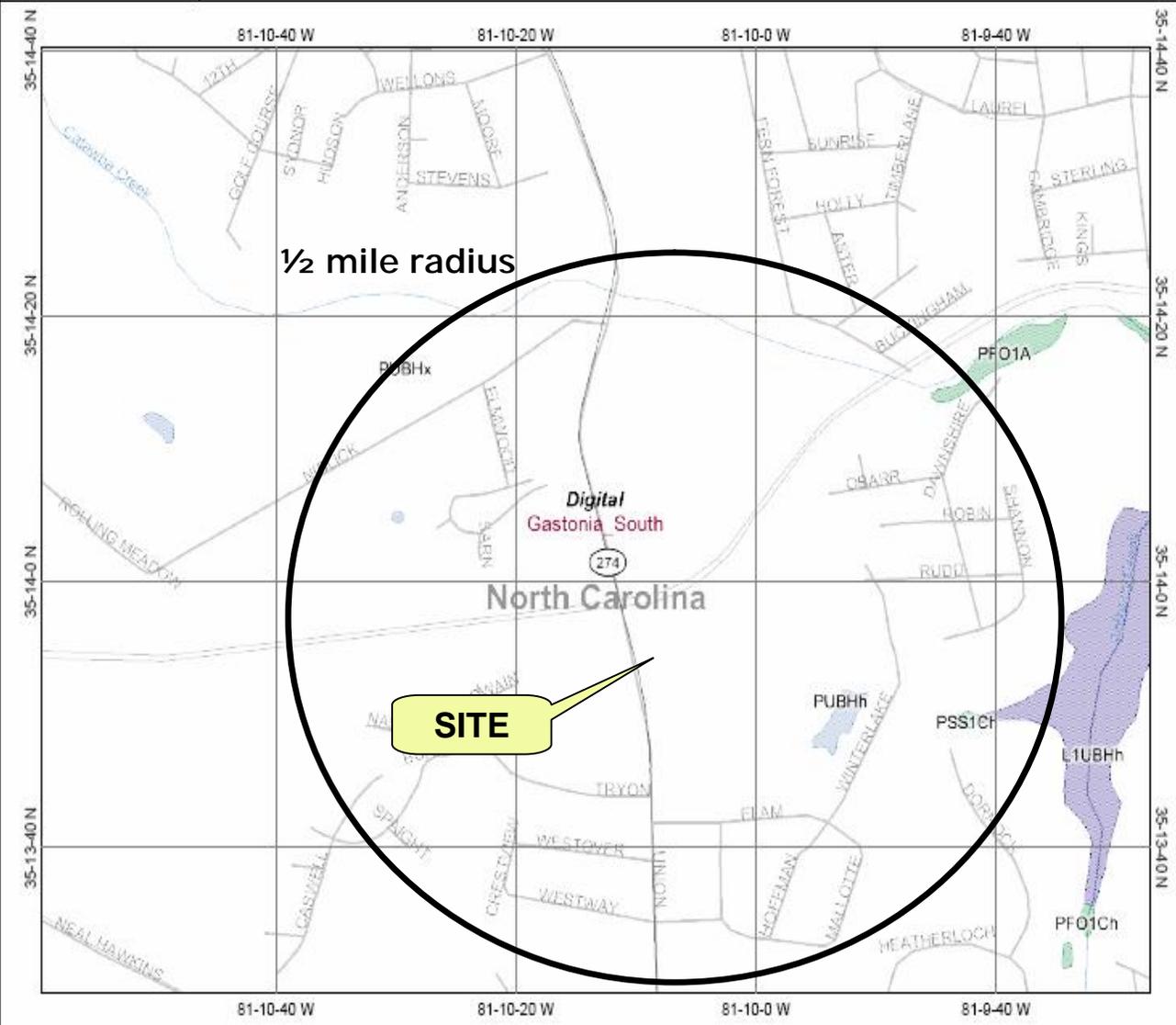


Attachment 2: US Army CORP of Engineers Map (Not to Scale)



Attachment 3: USFWS National Wetlands Inventory Map, Gaston County, NC

Internet Mapping Framework



Legend

CONUS_wet_scan

- 0
- 1
- Out of range

Interstate

Major Roads

- Other Road
- Interstate
- State highway
- US highway

Roads

- Cities

USGS Quad Index 24K

Lower 48 Wetland Polygons

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

Lower 48 Available Wetland Data

- Non-Digital
- Digital
- No Data
- Scan

NHD Streams

- Counties 100K
- States 100K
- South America
- North America

Map center: 35° 14' 5" N, 81° 10' 13" W

Scale: 1:15,374

This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

APPENDIX C

NOTICE OF DRY-CLEANING SOLVENT REMEDIATION

Property Owner: PP-Hudson, LLC
Recorded in Book ____, Page ____
Associated plat recorded in Plat Book ____, Page ____

NOTICE OF DRY-CLEANING SOLVENT REMEDIATION

This documentary component of a Notice of Dry-Cleaning Solvent Remediation (NDCSR or Notice), as well as the plat component, have been filed this ____ day of _____, 200__ by PP-Hudson, LLC (hereinafter “Property Owner”).

The Notice concerns contaminated property.

A copy of this Notice certified by the North Carolina Department of Environment and Natural Resources, or its successor in function (hereinafter “DENR”) is required to be filed in the Register of Deeds’ Office in the county or counties in which the land is located, pursuant to North Carolina General Statutes (hereinafter “NCGS”), Section (hereinafter “§”) 143-215.104M.

This Notice is required by NCGS § 143-215.104M in order to reduce or eliminate the danger to public health or the environment posed by environmental contamination at a property (hereinafter the “DSCA Site”) being addressed under the Dry-Cleaning Solvent Cleanup Act of 1997, Article 21A, Part 6 NCGS § 143-215.104A *et seq*, (hereinafter “DSCA”).

Pursuant to NCGS § 143-215.104M, the Property Owner must file a certified copy of this Notice 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.

The DSCA Site is located at Union Hudson Crossing Shopping Center, 2210 Union Road, Space #1, Gastonia, Gaston County, North Carolina and is approximately 8.65 acres in size. The DSCA Site was used as a retail dry-cleaning facility from approximately 1997 to 2005. Soil and groundwater are contaminated with dry-cleaning solvents.

Attached hereto as **Exhibit A** is a reduction, to 8 1/2" x 11", of the survey plat required by NCGS § 143-215.104M. It is a plat that has been prepared and certified by a professional land surveyor and that meets the requirements of NCGS § 47-30. That plat contains the following information:

- (1) 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 substances and contaminants known to exist on the DSCA Site.

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

LAND USE RESTRICTIONS

NCGS § 143-215.104M also requires that the Notice identify any restrictions on the current and future use of the DSCA Site that are necessary or useful to maintain the level of protection appropriate for the designated current or future use of the DSCA Site 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 its successor in function), or his/her designee, after the hazards have been eliminated, pursuant to NCGS §143-215104M. Those restrictions are hereby imposed on the DSCA Site, and are as follows:**

- 1. The DSCA Site shall be used exclusively for commercial or industrial purposes and related amenities (parking, landscape areas and walkways), and all other uses of the DSCA site are prohibited except as approved in writing by DENR.**
- 2. Without prior written approval from DENR, the DSCA Site shall not be used for:**
 - a. child care centers, schools, parks, recreational areas, athletic fields or sporting activities of any kind;**
 - b. agricultural or grazing purposes or for timber production;**
 - c. kennels, private animal pens, or for riding clubs;**
 - d. mining or extraction of coal, oil, gas or any other mineral or non-mineral substances.**
- 3. Surface water and underground water at the DSCA Site may not be used for any purpose without the approval of DENR.**
- 4. 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 DSCA Site without prior sampling and analysis of groundwater to the satisfaction of DENR in any areas proposed for such activities, and submittal of the analytical results to DENR. If such results disclose to DENR contamination in excess of North Carolina's groundwater quality standards, the proposed activities may not occur without the approval of DENR on such conditions as DENR imposes, including at a minimum compliance with plans and procedures, approved pursuant to applicable law, to protect public health and the environment during the proposed activities.**
- 5. In January of each year, on or before January 31st, the owner of any portion of the DSCA Site shall submit a notarized Annual DSCA Land Use Restrictions Certification to DENR certifying that this Notice remains recorded at the Gaston County Register of Deeds' office, that the Land Use Restrictions are being complied with.**
- 6. No person conducting environmental assessment or remediation at the Site, 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 DSCA Site for the purpose of conducting such activities.**
- 7. The owner of any portion of the DSCA Site 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 the Department, its agents, contractors, and employees, and any person performing pollution remediation activities under the direction of the Department, access at reasonable times and under reasonable security requirements to the Property to determine and monitor compliance with the Risk Management Plan and the land use restrictions set forth in this NDCSR. Such investigations and actions are necessary by the Department 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 NDCSR are maintained. Whenever possible, at least 48 hours of advanced notice will be given to the property owner prior to entry. Advanced notice may not always be possible due to conditions such as response time to complaints and emergency situations.

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 DSCA Site. 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 DSCA Site; 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 a NDCSR required under NCGS § 143-215.104.M is violated, the owner of the contamination site 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 DSCA Site is sold, leased, conveyed or transferred, pursuant to NCGS § 143-215.104M 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, a statement that the DSCA Site has been contaminated with dry-cleaning solvent and, if appropriate, cleaned up under the DSCA.

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

GENERAL PROVISIONS

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

CANCELLATION OF NDSCR

A NDSCR may, at the request of the Property Owner, be canceled by the Division after the risk to public health and the environment associated with the dry-cleaning solvent contamination and any other contaminants included in the DSCA Remediation Agreement have been eliminated as a result of remediation of the Property to unrestricted use standards.

OWNER SIGNATURE

IN WITNESS WHEREOF, Property Owner has caused this instrument to be duly executed this _____ day of _____, 200__.

PP-Hudson, LLC

By: _____
name of contact

NORTH CAROLINA
_____ COUNTY

I, _____, a Notary Public of the county and state aforesaid, certify that _____ personally came before me this day and acknowledged that he is a Member of PP-Hudson, 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 _____, 200__.

Name typed or printed:
Notary Public

My Commission expires: _____
[Stamp/Seal]

APPROVAL AND CERTIFICATION OF NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

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

North Carolina Department of Environment and Natural Resources

By: _____ Date _____
Jack Butler, Chief
Superfund Section
Division of Waste Management

LIMITED POWER OF ATTORNEY

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

The Division and the Division’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 NORTH CAROLINA
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 seal this ____ day of _____, 20__.

Notary Public

My Commission expires: _____

[SEAL]

CERTIFICATION OF REGISTER OF DEEDS

The foregoing documentary component of the Notice of Dry-Cleaning Solvent Remediation, and the associated plat, are certified to be duly recorded at the date and time, and in the Books and Pages, shown on the first page hereof.

Register of Deeds for Gaston County

By: _____

Name typed or printed: _____

Deputy/Assistant Register of Deeds

Date

EXHIBIT A

SURVEY PLAT REDUCTION

EXHIBIT B

LEGAL DESCRIPTION FOR PROPERTY

EXHIBIT B

(Legal Description)

BEING all that certain tract or parcel of land located within the City of Gastonia, Gaston County, North Carolina, and being known as 2204-2210 Union Road and being more particularly described as follows:

BEGINNING at an existing pk nail located in the easterly margin of the right of way of Union Road (North Carolina Highway 274), said right of way having a width of 80 feet, said pk nail being also located South 12-04-03 East 264.10 feet from an existing iron pin located at the southwesterly terminus of the right of way intersection line connecting the easterly margin of the said Union Road with the southerly margin of West Hudson Boulevard, said right of way having a width of 110 feet, and running thence from said POINT AND PLACE OF BEGINNING along the southerly and easterly boundaries of the property of McLees & Company, LLC as recorded in Deed Book 2983 Page 309 the following three (3) calls: (1) North 83-15-36 East 176.19 feet to an existing iron pipe with a crimped top, (2) North 06-40-32 West (passing an existing railroad spike at 175.40 feet) a total distance of 179.96 feet to a new iron pin, and (3) North 02-08-07 East 149.49 feet to a new iron pin located on the southerly margin of the aforesaid West Hudson Boulevard; thence along the southerly margin of the said West Hudson Boulevard the following four (4) calls: (1) following the arc of a circular curve to the left having a radius of 1,096.74 feet (passing an existing NC DOT right of way disk at an arc length of 478.60 feet) a total arc length of 600.23 feet (long chord bearing North 56-43-36 East 592.77 feet) to an existing NC DOT right of way disk, (2) North 48-57-07 West 15.00 feet to a new pk nail, (3) following the arc of a circular curve to the left having a radius of 1,081.74 feet and an arc length of 111.78 feet (chord bearing North 38-05-16 East 111.73 feet) to a point, and (4) North 35-07-39 East 9.34 feet to a new iron pin; thence along the westerly boundaries of the property of Terrace Ridge I, LLC, as recorded in Deed Book 4008 Page 851 and the property of Terrace Ridge II, LLC as recorded in Deed Book 4008 Page 854 South 14-39-24 East 606.50 feet to an existing iron pipe with a crimped top; thence along the westerly boundary of the property of Darrel B. Williams as recorded in Deed Book 3824 Page 914 South 01-04-55 East 165.36 feet to an existing iron pin; thence along the northerly boundary of the property of Shurgard Morningstar Storage Centers, LLC, as recorded in Deed Book 4098 Page 869 South 83-24-26 West 865.11 feet to a point located in the easterly margin of the aforesaid Union Road, thence along the easterly margin of the said Union Road North 12-04-03 West 73.61 feet to the point and place of BEGINNING, containing 8.7121 acres as shown on a survey prepared by Andrew G. Zoutewelle dated October 20, 2005, TOGETHER WITH all easements, rights of way, restrictions, covenants and other rights, privileges, and benefits appurtenant to or running with said lands.

APPENDIX D

EXAMPLE ANNUAL DSCA LAND-USE RESTRICTIONS CERTIFICATION

Site Name: Union Hudson Cleaners

Site Address: Union Hudson Shopping Center, 2210 Union Road, Space #1, Gastonia, Gaston County, NC

DSCA ID No: 36-0004

ANNUAL DSCA LAND USE RESTRICTIONS CERTIFICATION

Pursuant to Land Use Restriction Number _____ in a Notice of Dry-Cleaning Solvent Remediation (NDCSR) executed by _____ and recorded on _____ at the Gaston County Register of Deeds Office, PP-Hudson, LLC hereby certifies, as an owner of at least part of the property that is the subject of the NDCSR, that the NDCSR remains recorded at the Gaston County Register of Deeds office and the land use restrictions therein are being complied with.

Duly executed this _____ day of _____, 200_.

PP-Hudson, LLC

By: _____
Name typed or printed:
Member/Manager

NORTH CAROLINA
_____ COUNTY

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 PP-Hudson, LLC, a North Carolina limited liability corporation, and its Manager, and that by authority duly given and as the act of the corporation, the foregoing certification was signed in its name by him/her.

WITNESS my hand and official stamp or seal, this _____ day of _____, 200_.

Name typed or printed:
Notary Public

My Commission expires: _____

[Stamp/Seal]

APPENDIX E

NOTICE OF INTENT

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

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. One of the DSCA requirements (See N.C.G.S. 143-215.104L) is a 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 site maps and the proposed NDCSR.

A property owner who desires to enter into a DSCA Remediation Agreement must provide a copy of the NOI to all local governments having jurisdiction over the DSCA Site. Written public comments may be submitted to DENR no later than _____, 200_. Written requests for a public meeting may be submitted to DENR no later than _____, 200_. All such comments and requests should be addressed as follows:

**Billy Meyer, DSCA Program
Special Remediation Branch
Superfund Section
Division of Waste Management
NC Department of Environment and Natural Resources
401 Oberlin Road, Suite 150
Raleigh, North Carolina 27605**

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

Union Road Cleaners
DSCA Site No. 36-0004

Pursuant to N.C.G.S. §143-215.104L, PP-Hudson, LLC has filed with the North Carolina Department of Environment and Natural Resources (DENR) a Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site (NOI). The purpose of this summary is to notify the public of the proposed remedy for the affected property and invite comment on the proposed remedy.

The Property consists of the following parcel in Gastonia, North Carolina identified by street address and by the following property tax parcel identification numbers:

Union Hudson Crossing Shopping Center
2210 Union Road, Space #1
Gastonia, Gaston County, North Carolina
Parcel Number 3554-26-7633

Dry-cleaning solvent contamination has been discovered in soil and groundwater on a portion of the Property. The proposed remedy includes land use restrictions to control current and future site risks at the property referenced above.

The NOI is available for review by the public at the address provided below. To arrange a review of the NOI or for additional information, contact Billy Meyer at (919)508-8415. Written public comments may be submitted to DENR no later than _____, 200_. Written requests for a public meeting may be submitted to DENR no later than _____, 200_. All such comments and requests should be addressed as follows:

Billy Meyer, DSCA Program
Special Remediation Branch
Superfund Section
Division of Waste Management
North Carolina Department of Environment and Natural Resources
401 Oberlin Road, Suite 150
Raleigh, North Carolina 27605