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Director

May 10, 2016

Thomas Roberts
Manager
Trex Properties, LLC
1650 Des Peres Road, Suite 306
St. Louis, Missouri 63131

Re: Updated Draft Phase III RCRA Facility Investigation Report

Trex Properties, LLC
Charlotte, North Carolina
EPA ID # NCD 049 773 245

Dear Mr. Roberts,

A review of the Updated Draft Phase III RFI Report has been completed and the Hazardous Waste Section has the following comments:

1. The argument that the contamination beyond the property boundaries of 3114 and 3124 Cullman Avenue may have resulted from the poor waste/product handling at other facilities located on Cullman Avenue is based on speculation and assumptions. Specifically, the contamination at 3144 Cullman Avenue cannot be directly linked to the incidences that occurred at Nyanza Color and Chemical Company (Nyanza), in Ashland, Massachusetts. The Ashland site was a product/chemical production facility while 3144 Cullman Avenue was a sales and distribution facility. Poor material handling in Massachusetts does not equal poor material handling at Cullman Avenue. None of the information provided regarding the 3144 Cullman Avenue is definitive and therefore is not accepted by the State as proof the contamination is the result of another party. As such, Trex is still responsible for addressing the contamination at 3144 Cullman Avenue.
2. With regard to the steel drill bit that broke off and was left in well PWM-21B, it is not the steel bit that may cause issues with regard to the analytical results, but the lubricant used during the drilling process. Trex should provide justification in the next groundwater monitoring report that the lubricant used will not affect future sampling events. Otherwise, Trex will need to abandon the well and install a replacement.
3. The following wells were not sampled due to following reasons:
 - a. Well 4A – Dry at time of sampling,
 - b. Wells 14A and B – Dense vegetation prevented access,

- c. Wells 16A and B – Could not be located (possibly buried under railroad construction material),
- d. Wells 17A and B – Destroyed beyond repair, and
- e. Well 18A – Protective casing bent.

Prior to the next sampling event, Trex must locate Wells 14A, 14B, 16A, and 16B (dense vegetation is not an excuse to avoid well sampling). Once located, Trex must verify that these wells have not been compromised or damaged. If any of these wells have been compromised or damaged, the affected wells must be properly abandoned and replaced. In addition, wells 17A and 17B must be properly abandoned and replaced, and well 18A must be repaired or properly abandoned and replaced.

Note that in future Reports:

1. Trex should avoid using cyan and magenta on drawings and maps as these colors are hard to read and difficult to copy.
2. Trex should reference photographs placed in an appendix by page number or photograph number rather than referring the reader only to the Appendix.

Trex should continue with the pilot tests and corrective action measures as outlined in the Proposed Schedule submitted by Glenn Dunn on December 16, 2015 and approved with comments by the HWS on December 18, 2015 with final design submission due July 15, 2016.

If you have any questions or comments, please feel free to contact me at 919-707-8214 or Kathleen.lawson@ncdenr.gov.

Sincerely,



Kathleen Z. Lawson, Environmental Engineer
Division of Waste Management, NC DEQ

cc: David Craig, Trex
Glenn Dunn, Poyner & Spruill
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