



Waste Management  
ENVIRONMENTAL QUALITY

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*Governor*

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*Director*

December 18, 2015

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

Re: Schedule Approval Request and Withers & Ravenel's Positive Pressure Ventilation System Design for Leather Trimmings  
Trex Properties, LLC  
EPA ID # NCD 049 773 245

Dear Mr. Roberts:

This acknowledges the receipt on December 16, 2015 of Glenn Dunn's request for approval of the closure and remediation schedule submitted with his request. The Hazardous Waste Section (HWS) accepts and approves the schedule with the following comments:

1. Soil and groundwater contamination at Nexus Church is still considered to be the responsibility of Trex Properties. The information provided on Nyanza Color and Chemical Company is not sufficient to definitively state that the contamination at 3144 Cullman Avenue was produced by Nyanza. The history provided on the site in Ashland, Massachusetts is not indicative of the operations at 3144 Cullman Avenue. The Ashland site was a manufacturing facility and according to the information provided in the links in the NOTI Response to the May 26, 2015 Draft Phase III RFI Report, 45,000 tons of waste were buried on the Ashland site. There is nothing in the information provided by Mr. Dunn that states what activities were conducted at 3144 Cullman Avenue nor is there a list of the materials that were handled at the Cullman Avenue site. It should also be noted that more than fifty years have passed since Nyanza occupied the property at 3144 Cullman Avenue and they only occupied the site for four years. Trex must have to provide more definitive information regarding activities conducted at 3144 Cullman Avenue or information regarding the composition of the contamination behind and beneath 3144 Cullman Avenue and the contamination behind and beneath 3114 and 3124 Cullman Avenue for the HWS to consider the possibility of a separate source.
2. Soil and groundwater contamination at Leather Trimmings is still considered to be the responsibility of Trex Properties. Information provided to date shows no indication of a second source from this property.

3. A revised cost estimate must be submitted for remediation design alternatives by May 15, 2016 (Schedule line item 3a). If necessary, Trex will be required to provide financial assurance for additional costs prior to approval of the final remedy selection.
4. A final cost estimate must be submitted with the final remedy by July 15, 2016 (Schedule line item 3c). Additional financial assurance will be required 60 days after approval of the cost estimate.
5. Inability to conduct the geophysical survey north of the facility due to rail construction equipment remaining on site will not be considered a viable reason for delay of remediation on site and to the east and west of 3114 and 3124 Cullman Avenue.
6. Inability of Trex to complete clean closure of the RCRA regulated units will not be considered a viable reason for delay of remediation on site and to the east and west of 3114 and 3124 Cullman Avenue.

Note that the HWS would like to be notified when the following events are scheduled so that we may be present for the activities scheduled:

- a) Installation of the SVE system,
- b) Pilot test of the SVE system, and
- c) Clean water injection pilot test.

This also acknowledges the receipt on December 11, 2015 of Withers & Ravenel's Positive Pressure Ventilation System Design for Leather Trimmings. The Hazardous Waste Section and EPA have determined the design to be adequate with the following stipulations:

1. Trex must provide a schedule for installation of the Pressure Ventilation System for Leather Trimmings and for stabilization of the system. Once the system has stabilized, Trex must conduct indoor air sampling to determine that the system is effective in dealing with the existing vapor intrusion. When submitting the report of the sampling and analysis results to the HWS, Trex must also provide a description of the sampling procedure used along with the analytical results.
2. Trex must continue to conduct indoor air sampling at 3110 Cullman Avenue until the source, groundwater and possibly soil, of the indoor air issues have been remediated. Sampling events must occur twice a year, once during the winter and once during the summer.

It should be noted that additional indoor air sampling during the winter was required at Nexus Church (3144 Cullman Avenue). To date, Trex has not provided a schedule for this indoor air sampling event. Trex must conduct indoor air sampling at the church. Submission of a report describing the sampling procedure and the results must be submitted by February 15, 2016. Trex must also continue to conduct indoor air sampling at 3144 Cullman Avenue until the source,

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groundwater and soil, of the indoor air issues have been remediated. Sampling events must occur twice a year, once during the winter and once during the summer.

If you have any questions, please contact me at (919) 707-8214 or [kathleen.lawson@ncdenr.gov](mailto:kathleen.lawson@ncdenr.gov).

Sincerely,

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

ec: David Craig, Trex  
Glenn Dunn, Poyner & Spruill  
Brian Bellis, Withers & Ravenel  
Jay Osborn  
Bud McCarty  
Sandy Mort

Thomas Pike, ELT  
Ken Rayme, EPA  
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