



OUR CLIENTS DEMAND A SMARTER SOLUTION

November 18, 2009

Emergency Response and Removal Branch
US EPA Region 4
Atlanta Federal Center
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Atlanta, GA 30303-8906

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Attention: Mr. Stephen Ball, Jr.

Re: Monthly Progress Report
Forshaw Chemicals, Inc. Site
650 State Street
Charlotte, North Carolina
Site ID NCN 0100 409 865
H&H Job No. FOR-001

Dear Stephen:

On behalf of Forshaw Chemicals, Inc. and in accordance with Section 19 of the Administrative Settlement Agreement and Order on Consent for Removal Action between USEPA and Forshaw Chemicals, Inc. effective August 17, 2009 (the Settlement Agreement), Hart & Hickman, PC is submitting this monthly progress report for the Removal Action for the Forshaw Chemicals site located in Charlotte, North Carolina. The Removal Action Work Plan for the site was initially approved on September 17, 2009 with a subsequent revision requested on September 21, 2009. Section 19 of the Settlement Agreement indicates that a progress report is to be submitted every 30th day after the day of receipt of EPA's approval of the work plan. This is the second monthly progress report since approval of the work plan.

Significant Developments During the Preceding Period

- The removal action activities were initiated on October 19, 2009. Activities which have been performed include:
 - Blocking off the stormwater pipe leading to Excavation Area 1 at the upgradient manhole.
 - Partial construction of the treatment cell (the remainder will be constructed when the soil treatment is performed).
 - Removal of overburden soil and concrete in the excavation areas.
 - Stockpiling and covering of soil to be re-used in backfilling of the excavation.
 - Removal of soil in the area of the stormwater pipe (Excavation Area 1) and the area of the catch basin (Excavation Area 2) and placement of the soil in the treatment cell.

- Removal of the stormwater pipe from Excavation Area 1.
- Screening of soil containing concrete and organic debris prior to placement in the treatment cell.
- Cleaning of potentially impacted concrete removed from the excavation.
- Off-site transportation of uncontaminated and decontaminated concrete material.
- Mulching of organic material removed from the excavation and placement in the treatment cell.
- Collection and analysis of soil samples from the excavation sidewalls and base (see below).
- Repair of a sanitary sewer line in poor condition which was encountered in the southern portion of Excavation Area 1 (see below).
- Flushing of the stormwater line between Excavation Area 1 and the collection basin in the eastern portion of the site.
- Collection of impacted water from the excavation, decontamination activities, and the stormwater line flush and placement in an on-site holding tank.
- A deteriorated vitreous clay sanitary sewer line was encountered in the southern portion of Excavation Area 1. The sanitary sewer line was removed up to an on-site manhole to the north and was repaired. We believe that sanitary sewer line in poor condition was the source of much of the water infiltrating into the stormwater line. This activity led to a delay in the schedule of activities.
- Because of large rainfall amounts associated with the remnants of Hurricane Ida, site activities were shut down for approximately 4 days. During the large rainfall, the site was secured, sediment control devices were put in place, and measures were taken to divert stormwater away from the excavation areas and associated inlet structures. This led to delay in the schedule of activities

Analytical Data Received

- A draft summary of analytical data collected from the sidewalls and base of Excavation Area 1 and Excavation Area 2 is provided in the attached table. Data have been received from all samples for pentachlorophenol, and dioxins. The analytical results indicate that all of the sample concentrations are below the remedial objectives except for sample SW-5 (for pentachlorophenol and dioxins), and SW-6 (for dioxins only). These samples are located on the northern portions of the excavation. Additional excavation is being conducted in this area of site.

Developments Anticipated During the Next Reporting Period

- Activities that we anticipate will be conducted during the next reporting period include:
 - Completion of additional soil excavation in the northern portion of Excavation Area 1.
 - Completion of post-excavation soil sample laboratory analyses.
 - Additional flush of the stormwater line.
 - Repair of the stormwater line and associated catch basins removed from Excavation Area 1.

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- Collection of soil samples from the treatment cell for treatability testing.
- Backfilling of the excavation and pavement repair.

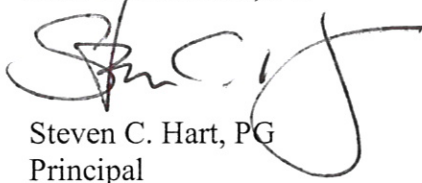
Anticipated Problems and Planned Resolutions of Past or Anticipated Problems
None.

We are submitting this document via e-mail. In addition, in accordance with the Settlement Agreement, two copies are being submitted by certified mail.

Should you have any questions or need any additional information, please feel free to contact me.

Very truly yours,

Hart & Hickman, PC



Steven C. Hart, PG
Principal

cc: Tom Forshaw (via E-mail)
Rob Smith (via E-mail)
Dave Franchina (via E-mail)

Table 1 (Page 1 of 2)
Summary of Confirmation Soil Sampling Results
Excavation Area 1
Forshaw Chemicals
Charlotte, North Carolina
H&H Job No. FOR-001

Sample ID	WHO 2005 TEF	SW-1		SW-2		SW-3		SW-4		SW-5		SW-6		SW-7		SW-8		SW-9		Site Remedial Objective
Date Collected		10/30/2009		10/30/2009		11/6/2009		11/6/2009		11/6/2009		11/6/2009		11/6/2009		11/6/2009		11/6/2009		
Pentachlorophenol (8270) (mg/kg)	--	<0.820		6.5		0.82		50		1400		130		150		71		20		300
Dioxins (8280) (µg/kg) ¹		Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	
2,3,7,8-TCDF	1	<1.0		<1.0		<1.0		<1.0		<5.0		<5.0		<5.0		<5.0		<5.0		
Total TCDF	--	<1.0		<1.0		<1.0		<1.0		<5.0		<5.0		<5.0		<5.0		<5.0		
2,3,7,8-TCDD	1	<1.0		<1.0		<1.0		<1.0		<12.0		<12.0		<12.0		<12.0		<12.0		
Total 2,3,7,8-TCDD	--	<1.0		<1.0		<1.0		<1.0		<12.0		<12.0		<12.0		<12.0		<12.0		
1,2,3,7,8-PeCDF	0.03	<1.0		5.5	0.165	<2.5		<2.5		<12.0		<12.0		<12.0		<12.0		<12.0		
2,3,4,7,8-PeCDF	0.3	<2.5		<2.5		<2.5		<2.5		<12.0		<12.0		<12.0		<12.0		<12.0		
Total PeCDF	--	<2.5		<2.5		<2.5		<2.5		<12.0		<12.0		<12.0		<12.0		<12.0		
1,2,3,7,8-PeCDD	1	<2.5		<2.5		<2.5		<2.5		<12.0 E		<12.0 E		<12.0 E		<12.0 E		<12.0		
Total PeCDD	--	<2.5		<2.5		<2.5		<2.5		<12.0		<12.0		<12.0		<12.0		<12.0		
1,2,3,4,7,8-HxCDF	0.1	<2.5		<2.5		<2.5		<2.5		<12.0		<12.0		<12.0		<12.0		<12.0		
1,2,3,6,7,8-HxCDF	0.1	<2.5		<2.5		<2.5		<2.5		<12.0		<12.0		<12.0		<12.0		<12.0		
2,3,4,6,7,8-HxCDF	0.1	<2.5		<2.5		<2.5		<2.5		<12.0		<12.0		<12.0		<12.0		<12.0		
1,2,3,7,8,9-HxCDF	0.1	<2.5		<2.5		<2.5		<2.5		<12.0		<12.0		<12.0		<12.0		<12.0		
Total HxCDF	--	<2.5		<2.5		<2.5		<2.5		<12.0		18	--	<12.0		<12.0		<12.0		
1,2,3,4,7,8-HxCDD	0.1	<2.5		<2.5		<2.5		<2.5		<12.0		<12.0		<12.0		<12.0		<12.0		
1,2,3,6,7,8-HxCDD	0.1	<2.5		<2.5		<2.5		<2.5		<12.0		19	1.9	<12.0		<12.0		<12.0		
1,2,3,7,8,9-HxCDD	0.1	<2.5		<2.5		<2.5		<2.5		<12.0		<12.0		<12.0		<12.0		<12.0		
Total HxCDD	--	<2.5		<2.5		<2.5		<2.5		<12.0		32	--	<12.0		<12.0		<12.0		
1,2,3,4,6,7,8-HpCDF	0.01	<2.5		4.0	0.04	<2.5		<2.5		70	0.7	110	1.1	30	0.3	27	0.27	<12.0		
1,2,3,6,7,8,9-HpCDF	0.01	<2.5		<2.5		<2.5		<2.5		<12.0		13	0.13	<12.0		<12.0		<12.0		
Total HpCDF	--	<2.5		4.0		<2.5		<2.5		370	--	560	--	150	--	120	--	32	--	
1,2,3,4,6,7,8-HpCDD	0.01	<2.5		39.0	0.39	<2.5		5.2	0.052	580	5.8	780	7.8	300	3.0	220	2.2	76	0.8	
Total HpCDD	--	<2.5		57.0	--	<2.5		5.2	--	730	--	1100	--	420	--	300	--	110	--	
OCDF	0.0003	<2.5		18.0	0.0054	<5.0		<5.0		1300	0.39	1600	0.48	170	0.051	310	0.093	44	0.0132	
OCDD	0.0003	26	0.0078	580.0	0.174	41	0.0123	60	0.018	5300	1.59	7300	2.19	3300	0.99	3200	0.96	1000	0.3	
2,3,7,8-TCDD Equivalence (µg/kg)	--	0.0078		0.7744		0.0123		0.07		8.48		13.6		4.341		3.523		1.0732		5

Notes:

Laboratory analytical method shown in parentheses following the parameter

¹ Adjusted concentration calculated by multiplying the raw value by the WHO 2005 TEF

WHO TEF = World Health Organization Toxicity Equivalency Factor

SW = Sidewall

Table 1 (Page 2 of 2)
Summary of Confirmation Soil Sampling Results
Excavation Area 1
Forshaw Chemicals
Charlotte, North Carolina
H&H Job No. FOR-001

Sample ID	WHO 2005 TEF	SW-10		SW-11		SW-12		BASE-1		BASE-2		BASE-3		BASE-4		BASE-5		BASE-5 Duplicate		Site Remedial Objective
Date Collected		11/7/2009		11/7/2009		11/7/2009		11/6/2009		11/6/2009		11/6/2009		11/7/2009		11/7/2009		11/7/2009		
Pentachlorophenol (8270) (mg/kg)	--	20		16		30		39		32		84		6.8		56		71		300
Dioxins (8280) (µg/kg)¹		Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	
2,3,7,8-TCDF	1	<1.0		<1.0		<1.0		<5.0		<1.0		<1.0		<1.0		<1.0		<1.0		
Total TCDF	--	<1.0		<1.0		<1.0		<5.0		<1.0		<1.0		<1.0		<1.0		<1.0		
2,3,7,8-TCDD	1	<1.0		<1.0		<1.0		<12.0		<1.0		<1.0		<1.0		<1.0		<1.0		
Total 2,3,7,8-TCDD	--	<1.0		<1.0		<1.0		<12.0		<1.0		<1.0		<1.0		<1.0		<1.0		
1,2,3,7,8-PeCDF	0.03	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
2,3,4,7,8-PeCDF	0.3	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
Total PeCDF	--	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,7,8-PeCDD	1	<2.5		<2.5		<2.5		<12.0 E		<2.5 E		<2.5 E		<2.5		<2.5 E		<2.5 E		
Total PeCDD	--	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,4,7,8-HxCDF	0.1	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,6,7,8-HxCDF	0.1	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
2,3,4,6,7,8-HxCDF	0.1	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,7,8,9-HxCDF	0.1	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
Total HxCDF	--	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,4,7,8-HxCDD	0.1	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,6,7,8-HxCDD	0.1	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,7,8,9-HxCDD	0.1	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
Total HxCDD	--	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,4,6,7,8-HpCDF	0.01	<2.5		<2.5		<2.5		25	0.25	<2.5		7.0	0.07	<2.5		<2.5		<2.5		
1,2,3,6,7,8,9-HpCDF	0.01	<2.5		<2.5		<2.5		<12.0		<2.5		<2.5		<2.5		<2.5		<2.5		
Total HpCDF	--	3.4	--	<2.5		3.9	--	140	--	6.8	--	36	--	4.5	--	26	--	20	--	
1,2,3,4,6,7,8-HpCDD	0.01	8.7	0.087	5.4	0.054	9.7	0.097	220	2.2	16.0	0.16	65.0	0.65	11.0	0.11	64	0.64	50	0.5	
Total HpCDD	--	13.0	--	5.4	--	14.0	--	320	--	23.0	--	89.0	--	16.0	--	92	--	71	--	
OCDF	0.0003	5.1	0.00153	<5.0		6.0	0.0018	380	0.114	10.0	0.003	44.0	0.0132	6.8	0.00204	39	0.0117	27	0.0081	
OCDD	0.0003	130.0	0.039	90.0	0.027	150.0	0.045	4900	1.47	280.0	0.084	770.0	0.231	180.0	0.054	1100	0.33	720	0.216	
2,3,7,8-TCDD Equivalence (µg/kg)	--	0.12753		0.081		0.1438		4.034		0.247		0.9642		0.16604		0.9817		0.7241		5

Notes:

Laboratory analytical method shown in parentheses following the parameter

¹ Adjusted concentration calculated by multiplying the raw value by the WHO 2005 TEF

WHO TEF = World Health Organization Toxicity Equivalency Factor

SW = Sidewall

Table 2
Summary of Confirmation Soil Sampling Results
Excavation Area 2
Forshaw Chemicals
Charlotte, North Carolina
H&H Job No. FOR-001

Sample ID	WHO 2005 TEF	SW-1A		SW-2A		SW-2A Duplicate		SW-3A		SW-4A		BASE-1A		Site Remedial Objective
Date Collected		11/6/2009		11/6/2009		11/6/2009		11/6/2009		11/6/2009		11/6/2009		
Pentachlorophenol (8270) (mg/kg)	--	2		2.5		3.9		1.4		0.86		0.86		300
Dioxins (8280) (µg/kg) ¹		Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	Raw	Adjusted	
2,3,7,8-TCDF	1	<1.0		<1.0		<1.0		<1.0		<1.0		<1.0		
Total TCDF	--	<1.0		<1.0		<1.0		<1.0		<1.0		<1.0		
2,3,7,8-TCDD	1	<1.0		<1.0		<1.0		<1.0		<1.0		<1.0		
Total 2,3,7,8-TCDD	--	<1.0		<1.0		<1.0		<1.0		<1.0		<1.0		
1,2,3,7,8-PeCDF	0.03	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
2,3,4,7,8-PeCDF	0.3	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
Total PeCDF	--	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,7,8-PeCDD	1	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
Total PeCDD	--	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,4,7,8-HxCDF	0.1	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,6,7,8-HxCDF	0.1	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
2,3,4,6,7,8-HxCDF	0.1	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,7,8,9-HxCDF	0.1	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
Total HxCDF	--	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,4,7,8-HxCDD	0.1	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,6,7,8-HxCDD	0.1	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,7,8,9-HxCDD	0.1	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
Total HxCDD	--	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
1,2,3,4,6,7,8-HpCDF	0.01	3.0	0.03	4.7	0.047	3.6	0.036	<2.5		<2.5		<2.5		
1,2,3,6,7,8,9-HpCDF	0.01	<2.5		<2.5		<2.5		<2.5		<2.5		<2.5		
Total HpCDF	--	8.8	--	15	--	10.0	--	<2.5		4.0	--	<2.5		
1,2,3,4,6,7,8-HpCDD	0.01	17.0	0.17	29.0	0.29	19.0	0.19	<2.5		8.6	0.086	2.6	0.026	
Total HpCDD	--	28.0	--	45.0	--	30.0	--	<2.5		14.0	--	2.6	--	
OCDF	0.0003	10.0	0.003	16.0	0.0048	11.0	0.0033	<5.0		8.2	0.00246	<5.0		
OCDD	0.0003	280.0	0.084	420.0	0.126	300.0	0.09	32	0.0096	170.0	0.051	49.0	0.0147	
2,3,7,8-TCDD Equivalence (µg/kg)	--	0.287		0.4678		0.3193		0.0096		0.13946		0.0407		5

Notes:
Laboratory analytical method shown in parentheses following the parameter
¹ Adjusted concentration calculated by multiplying the raw value by the WHO 2005 TEF
WHO TEF = World Health Organization Toxicity Equivalency Factor
SW = Sidewall