Waste Management
ENVIRONMENTAL QUALITY

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March 17, 2016

Mr. Jamie VanBuskirk
DuPont Engineering
6324 Fairview Road
Charlotte, North Carolina 28210

Re: **Comments on Conceptual Remedial Action Plan**
Former DuPont Brevard Facility
EPA ID No. NCD 003 152 329

Dear Mr. VanBuskirk,

The North Carolina Hazardous Waste Section (HWS) has reviewed the Conceptual Remedial Action Plan (RAP) submitted February 5, 2016 for the DuPont Facility in Brevard and has the attached comments. The HWS encourages DuPont representatives to contact the HWS for a meeting to discuss the issues raised by these comments.

Please contact me at 919-707-8207 or by email at mark.wilkins@ncdenr.gov if you have any questions or to schedule a meeting.

Sincerely,

Mark Wilkins, Hydrogeologist, Hazardous Waste Section
Division of Waste Management, NCDEQ

Attachments

ec: Joe Hudyncia, NC DA&CS
David Smith, NC DA&CS
Col. Todd Hunt, NCNG
Julie Woosley
Brent Burch
Jeff Menzel
Sandra Mort
Bud McCarty

Comments on DuPont Conceptual RAP submitted 2/5/2016
Former DuPont-Brevard Facility
EPA ID NCD 003 152 329

1. Section 2.6.6 – As indicated in HWS comments on the Remedial Investigation Workplan (RIW) and the Remedial Investigation Report (RIR), data from boring logs advanced during the Phase II RFI and during implementation of the RIW indicate there may not be sufficient cap/cover at some of the SWMUs where waste remains in place. During a December 2015 meeting, DuPont personnel indicated they would consider installation of additional cover materials (e.g. gravel at SWMU 13 of sufficient quantity to use as a potential parking area) at some site SWMUs. If DuPont is still considering this plan, it should be indicated in the RAP.

2. Section 2.6.7 and 2.7.3 - SWMU 2C is listed as requiring No Further Action (NFA). In comments on the Phase II RFI Report, the HWS requested DuPont collect additional samples at SWMU 2C. Additional analysis was requested due to the presence of additional potential contamination identified in the bore log for SB-1. The additional contamination was identified below the sample interval that was submitted to the laboratory for analysis indicating potential higher concentration of contamination further below the surface. SWMU 2C is within the former manufacturing area proposed for restricted use (notification and sampling required) so that any future users will know that potentially contaminated soil could be encountered during excavation. However, it could be important to future owners of the site to realize there may be underlying contamination in this area that, if disturbed, will need to be managed properly, up to and including excavation and offsite disposal.

3. Section 2.6.7 - This Section of the RAP lists AOCs I and J as requiring No Further Action. AOC I is the former Powerhouse Area while AOC J is the Dowtherm Vaporizer Area. Both these AOCs are in the vicinity of DU-6 and DU-11, where additional work is proposed (additional PCB soil sampling, fence installation, etc.). The status of these AOCs should be clarified.

4. Section 2.7.3 – The Land Management Plan creates an area where the owner must notify DEQ and conduct confirmatory sampling prior to beginning excavation. It will be important to future owners of the site to realize there may be underlying contamination in this area that, if disturbed, will need to be managed, up to and including excavation and offsite disposal.

5. Section 2.8 – AOC 2C should be moved from NFA to the category that requires notification and sampling prior to excavation.

6. Section 2.8 - AOC F is listed as NFA in the Permit but is listed in the RAP as an area where excavation is prohibited. The status of AOC F should be clarified.

7. Section 2.8 – See comment 3.

8. Section 2.8 - AOC A is listed as Further Action Needed in this Section. The status of this AOC should be clarified

9. Section 2.12 - In August 2015, EPA revised Ecological Screening Values (ESVs) used for evaluating ecological systems. DuPont should use the 2015 EPA ESVs document to develop Remedial Levels based on ESVs for the site. https://www.epa.gov/risk/region-4-ecological-risk-assessment-supplemental-guidance

10. Section 2.12 – 130A-310.68 states site-specific remediation standards for surface waters shall be the water quality standards adopted by the Commission. Therefore the surface water standards will be those listed in NC 2B. If hazardous constituents related to the site are detected above NC 2B standards in surface water, steps must be taken to reduce these constituents in surface water.

11. Section 4.1 and 4.2 – DuPont should clarify that no additional remedial action is required for the surface and subsurface soil, so long as Institutional and or Engineering Controls preventing or restricting exposure are instituted and maintained. For example, if the cover at SWMU 13 is not maintained to prevent erosion or excavation is allowed at this SWMU, then users could be exposed to surface or subsurface soil at levels above site specific remedial levels.

12. Section 4.2 – As part of Institutional Controls (ICs) for the Facility, the RAP should propose methods for future users of the site to identify that an area is restricted (e.g. signs with “Contact DEQ prior to excavation” or similar wording, etc.).

13. Section 5 – The RAP should include statements that additional samples are to be collected in order to complete assessment of the nature and extent of PCB contamination in all potentially impacted media at the Facility. The RAP should state that assessment and potential cleanup of PCBs at the site will comply with: EPA rules for PCB remediation; follow the February 28, 2013 guidance on PCB characterization referenced in the U.S. EPA Region 4 Issue Paper for PCB Characterization at Region 4 Superfund and RCRA Sites available at https://www.epa.gov/risk/region-4-issue-paper-pcb-characterization ; and, will be protective of human health and the environment.

14. Section 5 – The RAP should include a statement that a RCRA Part B Permit Renewal Application will be prepared and submitted as required in 40CFR 270.30 unless the RAP Completion Report has been approved by DEQ prior to the due date of the Renewal Permit.

15. Section 5 – The RAP should include plans for: surveying the areas where Land Use Restrictions (LURs) will be implemented; development of plat maps that meet the requirements of NCGS 47-30 and 143B-279.10; development of LUR language to be included on plats; and, the recordation of the LURs and plats in the register of deeds office.

16. Section 5 – The RAP should include a plan to abandon site monitoring wells to comply with NCAC 2C requirements. The plan should address near term abandonment of wells that will no longer be utilized for monitoring purposes and for abandonment of additional monitoring wells once it is determined they are no longer needed.

17. Section 7.2.3 – In order to further define the extent of contaminated groundwater and as part of the investigation process to determine the potential for vapor intrusion at the DuPont State Forest Visitor Center, the RAP should include a plan for installation of a monitoring well near the Visitor Center. The well should be installed to monitor the uppermost aquifer (i.e. screened across the top of the water table).

18. Section 7.6.2 – see comment 6.

19. Section 7.6.2 – the RAP should indicate potential methods for future users of the site to identify that an area is restricted (e.g. signs with "Contact NCDEQ or NCDA&CS prior to excavation" or similar wording). Related to this, consideration should be given to establishment and maintenance of on-site and electronic repositories for the Property Control Plan for future owners/operators of the site.

20. Diphenyl Ether and Biphenyl were both detected in sediment samples from DERA Creek and Diphenyl Ether was detected in surface water collected from DERA Creek. The RAP should propose additional sediment sampling and analysis for these constituents in addition to the analysis proposed for PAHs.