



OUR CLIENTS DEMAND A SMARTER SOLUTION

Via Hand-Delivery

June 26, 2009

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Re: Response to Comments - Brownfield Phase II Site Assessment Report
Piedmont Triad Council of Governments
Brownfield Assessment Project
Lexington Home Brands, Plant 1
Lexington, North Carolina, BF-96460406-0
H&H Job No. PTC-003

Dear Sharon:

On behalf of the Piedmont Triad Council of Governments, Hart & Hickman (H&H) is pleased to submit this Response to Comments on the Brownfield Phase II Site Assessment Report for the Lexington Home Brands Plant 1 Site in Lexington, North Carolina. Based upon comments from NCDENR review and our subsequent discussions, H&H has made appropriate edits to the following:

- Signed and sealed report cover.
- Page I of the Table of Contents due to formatting changes.
- Report Pages 9 through 14 - Duplicate, matrix spike, and matrix spike duplicate samples were cross referenced with corresponding soil or groundwater samples.
- Table 1 – Corrected total soil sample quantities.
- Table 2 – Lithologic units were described, soil SRGs were revised to show correct limits, and exceedance of revised SRGs was addressed.
- Table 4 – NCAC 2L Standard for Benzo(b)fluoranthene was revised to show the correct value.
- Figure 8 – Revised to display data in correct units.
- Appendix D – Expanded on field QA/QC. Mention of field audits. Thorough description of “H” laboratory data qualifier and data implications and discussion of SVOC laboratory reporting limits above NCDENR SRGs.

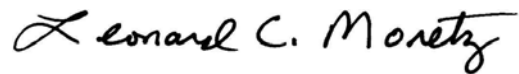
The aforementioned report pages, tables, figure, and appendix are included as attachments to this letter and are designated with the notation: Revision 1. These revised pages should be placed into the original document.

Sharon Eckard
6/26/2009
Page 2

Should you require additional information or have questions regarding this document please contact me at 919-723-2501 or via email at lmoretz@harthickman.com.

Sincerely,

Hart & Hickman, PC



Leonard Moretz, PG
Project Director/Branch Manager

cc: Ms. Cindy Nolan, US EPA
Mr. John Gray, City of Lexington City Manager
Mr. Paul Kron, Piedmont Triad Council of Governments

**Brownfield Phase II
Site Assessment Report
Revision 1
Former Lexington Home Brands-Plant 1
Lexington, North Carolina**

H&H Job No. PTC-003

June 26, 2009



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**Brownfield Phase II Site Assessment Report
Former Lexington Home Brands - Plant 1
Lexington, North Carolina
H&H Job No. PTC-003**

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Each of the soil samples was assigned a unique name which included the sample location and depth. Thirty-seven (37) soil samples were submitted for laboratory analysis. Duplicate and matrix spike/matrix spike duplicate (MS/MSD) samples were retained to ensure Level II laboratory quality Assurance/Quality Control (QA/QC). Quality control samples and corresponding samples are listed below.

- DUP 011309-A – SB-1 (1')
- DUP 011309-B – SB-2 (0-0.5')
- DUP 011309-C – SB-35 (10-11')
- DUP 011309-D – SB-12 (0-1')
- DUP 011409-A – SB-11 (1')
- MS/MSD – SB-20 (0-1')
- MS/MSD-2 – SB-29 (14-15')

A summary of the soil sample and analytical program is presented in **Table 1**. Results are presented in **Table 2** and discussed in Section 3.3.

Laboratory analyses were conducted by Prism Laboratories, Inc., a North Carolina-certified and Woman-owned Business Enterprise (WBE) analytical laboratory located in Charlotte, NC. Samples were placed into the appropriate containers, stored on ice in coolers, and submitted to the laboratory under standard chain-of-custody protocol.

After soil sampling was completed, each of the DPT bore holes, except those borings converted to temporary or permanent monitoring wells were backfilled with soil and bentonite to surface grade and capped with concrete. Boring and monitoring well logs are provided in **Appendix A**.

Investigation-derived waste was contained in 55-gallon UN1A steel drums temporarily stored onsite. A label indicating that the drum(s) are “on hold pending analysis” was affixed to the exterior of the drum(s) and the contents of the drum(s) “investigative derived waste – soils” was annotated along with the generation date(s) on the label. Analyses of the drummed material indicated the material was non-hazardous. The drums were transported and properly disposed at

an offsite permitted facility by Garco, Inc. on May 13, 2009. A copy of the waste profiles and Certificate of Disposal are provided in **Appendix B**.

2.4.1 Study Area 1

Soil borings installed within Study Area 1 included those designated as SB-1, SB-2, SB-3, SB-6, SB-7, SB-10, SB-11, SB-12, SB-13, SB-14, SB-15 and SB-17. Locations of these borings and wells are shown on **Figure 3**. All soil samples obtained for laboratory analysis in Study Area 1 were within 3 feet of surface grade due to the shallow ground water table encountered in this area. Soil samples from the three Study Areas were analyzed according to the plan presented in **Table 1**.

SB-4 and SB-5 were advanced but soils were not sampled because ground water was encountered within ½ foot of surface grade. Soil was also not collected from SB-8 and SB-9 because of the shallow (less than 3' bgs) ground water level. These borings were proposed to evaluate unsaturated soil conditions at the bottom of the former 3,000 thinner overflow tank and the former 7,500 gallon naphtha tank. However, due to the high water table, samples collected at the required depth would have been below the water table. In a January 13, 2008 conversation with Mr. Michael Rogers of the NC DENR UST Section, Winston Salem Regional Office, H&H was advised that collection of soil samples at these locations would not be necessary because the base of the former USTs were within saturated soils.

Permanent monitoring wells MW-1A, 2A, 3A and 4A were installed within Study Area 1 and soil samples were obtained from each of these wells during their installation

2.4.2 Study Area 2

A single boring (SB-27) was installed in Study Area 2 to evaluate soil and ground water conditions at the location of the release from a former 550 gal gasoline UST (**Figure 4**). SB-27 was installed to a depth of 22 ft-bgs in the center of the former tank pit. A soil sample was retained from SB-27 at a depth of 8 to 9 ft-bgs, the anticipated bottom of the former tank pit, in

native soils. Boring SB-27 was advanced approximately 2 feet below the water table, to install a temporary monitoring well and obtain a ground water sample. Installation and sampling of the temporary well at this location is discussed in **Section 2.5.2**.

2.4.3 Study Area 3

Thirteen (13) soil borings (SB-28 to SB-40) were installed within Study Area 3 as shown on **Figure 4**. In accordance with the QAPP, soil samples within this area were generally obtained within 3 ft. of surface grade (with the exception of borings SB-28, SB-29 and SB-35).

Samples SB-28 and 29 were obtained from depths of 14 to 15 ft. bgs, approximately 2 ft. below the estimated base depth of an abandoned fuel oil UST. Boring SB-29 was placed immediately downgradient of the former UST and extended to a depth of 20 ft. bgs to install a temporary monitoring well. Installation and sampling of the temporary well at this location is discussed in **Section 2.5.3**.

Sample SB-35 was retained from 10 to 11 ft. bgs, approximately 2 ft. below the estimated base depth of two gasoline USTs which were removed in 1989. Boring SB-35 was extended to a depth of 20 ft-bgs to install a temporary monitoring well. Installation and sampling of the temporary well at this location is discussed in **Section 2.5.3**.

Samples SB-36 and SB-37 were collected to assess potential impacts from two in-floor vaults/sumps in the former wood processing area. The former use of these features is unknown. These vaults/sumps were approximately eight feet long by four feet wide by two feet deep. The features were dry with no signs of staining or sludge. Samples were collected adjacent to and immediately beneath the bottom of the vaults/sumps.

2.5 Monitoring Well Installation

As specified in the QAPP, four (4) permanent ground water monitoring wells (MW-1A, MW-2A, MW-3A and MW-4A) were installed to assess the shallow ground water within Study Area 1. In addition, soil borings SB-2, SB-4, SB-6, SB-7, SB-10, SB-14, SB-27, SB-29 and SB-35 were extended into the water table and completed as temporary monitoring wells. Both permanent and temporary wells were constructed in accordance with the QAPP, and North Carolina Administrative Code (NCAC), Chapter 15A, Subchapter 02C, Section .0108 (Standards of Construction: Wells Other Than Water Supply). After sampling, the temporary wells were abandoned in accordance with the above standard. Well Construction records for the installation of these wells are presented in **Appendix C**. Permanent monitoring well construction data are summarized in **Table 3**. Installation of permanent and temporary wells and sampling of ground water are discussed below.

2.5.1 Study Area 1

Within Study Area 1, four (4) permanent ground water monitoring wells (MW-1A, MW-2A, MW-3 A and MW-4A) were installed at the locations shown on **Figure 3**. Wells MW-1A, MW-3A and MW-4A were each installed to 12 ft. bgs, while MW-2A was installed to 17 ft. bgs. Wells were installed after the collection of soil samples.

Temporary wells were set in borings SB-2, SB-4, SB-6, SB-7, SB-10 and SB-14 (**Figure 3**). After collection of soil samples from these borings, each was extended (if necessary) to penetrate the water table at their location. Temporary wells were installed and constructed as outlined in the QAPP. Ground water sampling is discussed in **Section 2.6**.

2.5.2 Study Area 2

Following collection of soil samples from boring SB-27 (**Figure 4**), the boring was extended to 22 ft. bgs and a temporary well was installed and constructed as outlined in the QAPP. Ground water sampling is discussed in **Section 2.6**.

2.5.3 Study Area 3

After collection of soil samples from borings SB-29 and SB-35 (**Figure 4**), the borings were extended to depths of 20 ft. and temporary wells were installed and constructed as outlined in the QAPP. Ground water sampling is discussed in **Section 2.6**.

2.6 Ground Water Sampling

Ground water samples were collected from temporary wells installed in borings SB-2, SB-4, SB-6, SB-7, SB-10, SB-14, SB-27, SB-29 and SB-35 on January 14, 2009. Samples were collected from permanent monitoring wells MW-1A, MW-2A, MW-3A and MW-4A, installed in Study Area 1 on January 23, 2009. Prior to sampling, the water level within the well was measured from ground surface (in the case of the temporary wells) or the top of the well casing (in the case of the permanent wells). Each well was purged and sampled in accordance with procedures outlined in the QAPP.

Samples obtained from temporary wells SB-2, SB-4, SB-6, SB-7, SB-10 and SB-14 were submitted for analysis of VOCs, SVOCs and metals by EPA Methods 8260B, 8270C and 6010B/7471A, respectively. Samples obtained from temporary wells SB-27 and SB-35 were submitted for analysis of VOCs by EPA Method 8260B and VPH by the MADEP-VPH method. The sample obtained from SB-29 was submitted for analysis of SVOCs and EPH by EPA Method 8270C and the MADEP-EPH method, respectively.

Samples from permanent wells MW-1A, MW-2A, MW-3A and MW-4A were submitted for analysis of VOCs, SVOCs and RCRA metals by EPA Methods 8206B, 8270C and

6010B/7471A, respectively. In addition to these methods, the sample from MW-4A was also analyzed for pesticides using EPA Method 8081A.

In accordance with the QAPP, duplicate, matrix spike and matrix spike duplicate samples were obtained from the temporary and/or permanent wells. Quality control samples and corresponding samples are listed below.

- GW-DUP-012309 – MW4A
- MS/MSD (1/14/09) – SB-35
- MS/MSD (1/23/09) – MW-3A

Several monitoring wells installed during assessment of the former 550 gallon petroleum UST in Study Area 2 and were proposed in the QAPP to be sampled. However, field inspection revealed these wells had been permanently abandoned as part of the NFA granted for this UST. Therefore, these wells were not sampled as a part of the SA.

Analytical data for the ground water samples are discussed in **Section 3.4**, and summarized in **Table 4**.

2.7 Permanent Well Elevations Measurement

Relative elevations of each permanent well were established on January 23, 2009 utilizing a transit and stadia rod. A benchmark with an assumed elevation of 500.00 ft. was established at a random location on the site, and the relative elevation of each well was measured based on the assumed elevation of the benchmark. The relative elevation data were used to calculate ground water hydraulic gradient, based on water level elevations also obtained on January 23, 2009. Relative elevations are presented in **Table 3**.

**Table 1 - Revision 1
Sample Summary
Brownfield Phase II Site Assessment
Former Lexington Home Brands - Plant 1
Lexington, North Carolina
H&H Job No. PTC-003**

Boring Location	Depth Interval	Sample Objective	Lab Documentation	ANALYSES					
				VOCs EPA 8260B	SVOCs EPA 8270C	RCRA Metals EPA 6010B / 7471A	MADEP EPH	MADEP VPH	Pesticides EPA 8081
Soil Samples:									
SB-1	0-1'	Evaluation of Drainage Structures near ASTs	Level II	1	1	1	0	0	0
SB-2	0-0.5'	Evaluation of Drainage Structures near ASTs	Level II	1	1	1	0	0	0
SB-3	0-1'	Evaluation of Drainage Structures near ASTs	Level II	1	1	1	0	0	0
SB-6	0-1'	Evaluation of Bermed Area near Mixing Room	Level II	1	1	1	0	0	0
SB-7	0-1'	Evaluation of Bermed Area near Mixing Room	Level II	1	1	0	0	0	0
SB-10	0-1'	Evaluation of Bermed Area near AST	Level II	1	1	1	0	0	0
SB-11	0-1'	Evaluation of Bermed Area near AST	Level II	0	0	0	1	1	0
SB-12	0-1'	Evaluation of Boiler Room Floor Drains	Level II	0	1	0	1	0	0
SB-13	1-1.75'	Evaluation of Boiler Room Floor Drains	Level II	0	1	0	1	0	0
SB-14	1-2'	Evaluation of Downgrade Drainage Area	Level II	1	1	1	0	0	0
SB-15	0-1'	Evaluation of Air Blowdown Area	Level II	1	1	1	0	0	0
SB-16	1-2'	Evaluation of Former Hazardous Storage Pad	Level II	1	1	1	0	0	0
SB-17	0-1'	Evaluation of Downgrade Drainage Area	Level II	1	1	1	0	0	0
SB-20	0-1'	Evaluation of Former Finishing Plant	Level II	1	1	0	0	0	1
SB-21	0-1'	Evaluation of Former Finishing Plant	Level II	1	1	0	0	0	1
SB-22	0-1'	Evaluation of Former Finishing Plant	Level II	1	1	0	0	0	1
SB-23	0-1'	Evaluation of Former Finishing Plant	Level II	1	1	1	0	0	0
SB-23	2-3'	Evaluation of Former Finishing Plant	Level II	1	1	1	0	0	0
SB-24	0-1'	Evaluation of Former Finishing Plant	Level II	1	1	0	0	0	1
SB-27	8-9'	Evaluation of Former Gasoline UST Area	Level II	1	0	0	0	1	0
SB-28	14-15'	Evaluation of Abandoned Fuel Oil UST	Level II	0	1	0	1	0	0
SB-29	14-15'	Evaluation of Abandoned Fuel Oil UST	Level II	0	1	0	1	0	0
SB-30	2-3'	Evaluation of Existing 10K Fuel Oil AST	Level II	0	1	0	1	0	0
SB-31	2-3'	Evaluation of Existing 10K Fuel Oil AST	Level II	0	1	0	1	0	0
SB-32	2-3'	Evaluation of Former Vehicle Storage Area	Level II	1	1	0	0	0	0
SB-33	2-3'	Evaluation of Former Vehicle Storage Area	Level II	1	1	0	0	0	0
SB-34	2-3'	Evaluation of Former Vehicle Storage Area	Level II	1	1	0	0	0	0
SB-35	10-11'	Evaluation of Former Gasoline UST Area	Level II	1	0	0	0	1	0
SB-36	2-3'	Evaluation of Sumps	Level II	1	1	0	0	0	0
SB-37	2-3'	Evaluation of Sumps	Level II	1	1	0	0	0	0
SB-38	2-3'	Evaluation of Existing 550 Gal ASTs	Level II	0	1	0	1	0	0
SB-39	2-3'	Evaluation of Former Vehicle Maintenance Shop	Level II	1	1	0	0	0	0
SB-40	2-3'	Evaluation of Former Vehicle Maintenance Shop	Level II	1	1	0	0	0	0
MW-1A	1-2'	"Upgradient" Well Location	Level II	1	1	1	0	0	0
MW-2A	0-1'	Evaluation of Area Downgradient of Paint Storage & Mixing Rooms, Hazardous Storage Pad	Level II	1	1	1	0	0	0
MW-3A	0-1'	Evaluation of Area Downgradient of Former Finishing Plant	Level II	1	1	1	0	0	0
MW-4A	1-2'	Evaluation of Area Downgradient of Former Finishing Plant	Level II	1	1	1	0	0	0
Duplicate	N/A	Data Quality Assurance	Level II	3	4	1	1	1	1
MS/MSD	N/A	Data Quality Assurance	Level II	3	4	0	1	0	1
TOTALS:				35	42	16	10	4	6
Water Samples		Sample Objective	Lab Documentation	ANALYSES					
				VOCs EPA 8260B	SVOCs EPA 8270C	RCRA Metals EPA 6010B / 7471A	MADEP EPH	MADEP VPH	Pesticides EPA 8081
SB-2	N/A	Evaluation of Drainage Structures near ASTs	Level II	1	1	1	0	0	0
SB-4	N/A	Evaluation of Vaults/Sumps	Level II	1	1	1	0	0	0
SB-6	N/A	Evaluation of Bermed Area near Mixing Room	Level II	1	1	1	0	0	0
SB-7	N/A	Evaluation of Bermed Area near Mixing Room	Level II	1	1	1	0	0	0
SB-10	N/A	Evaluation of Bermed Area near AST	Level II	1	1	1	0	0	0
SB-14	N/A	Evaluation of Downgrade Drainage Area	Level II	1	1	1	0	0	0
SB-27	N/A	Evaluation of Former Gasoline UST Area	Level II	1	0	0	0	1	0
SB-29	N/A	Evaluation of Abandoned Fuel Oil UST	Level II	0	1	0	1	0	0
SB-35	N/A	Evaluation of Former Gasoline UST Area	Level II	1	0	0	0	1	0
MW-1A	N/A	"Upgradient" Well Location	Level II	1	1	1	0	0	0
MW-2A	N/A	Evaluation of Area Downgradient of Paint Storage & Mixing Rooms, Hazardous Storage Pad	Level II	1	1	1	0	0	0
MW-3A	N/A	Evaluation of Area Downgradient of Former Finishing Plant	Level II	1	1	1	0	0	1
MW-4A	N/A	Evaluation of Area Downgradient of Former Finishing Plant	Level II	1	1	1	0	0	1
Trip Blank	N/A	Data Quality Assurance	Level II	2	0	0	0	0	0
Duplicate	N/A	Data Quality Assurance	Level II	1	1	1	0	0	1
MS/MSD	N/A	Data Quality Assurance	Level II	2	1	1	0	1	1
TOTALS:				17	13	12	1	3	4

Notes:

1. VOCs = Volatile Organic Compounds
2. SVOCs = Semi-Volatile Organic Compounds
3. RCRA Metals Includes analysis by EPA Method 6010B for arsenic, barium, cadmium, chromium, lead, selenium and silver, as well as mercury by EPA Method 7471A
4. MADEP-EPH = Massachusetts Department of Environmental Protection - Extractable Petroleum Hydrocarbons
4. MADEP-VPH = Massachusetts Department of Environmental Protection - Volatile Petroleum Hydrocarbons

Table 2 - Revision 1
 Summary Analytical Data - Soil
 Brownfield Phase II Site Assessment
 Former Lexington Home Brands - Plant 1
 Lexington, North Carolina
 H&H Job No. PTC-003

Boring Location	Area 1										Screening Levels			
	SB-1	SB-2	SB-3	SB-6	SB-7	SB-10	SB-11	SB-12	SB-13	SB-14	EPA RSL ¹		NCDENR (Soils)	
Sample ID	SB-1	SB-2	SB-3	SB-6	SB-7	SB-10	SB-11	SB-12	SB-13	SB-14	Residential	Industrial	Health Based SRG ²	NCDENR Background Range ³
Sample Depth (ft)	1'	0-0.5'	1'	1'	0-1'	1'	1'	0-1'	1-1.75	1-2'				
Lithology	Clayey Silt	Clayey Silt	Clayey Silt	Silty Sand	Clayey Sand	Sandy Silt	Sandy Silt	Fine Sand	Clayey Silt	Sandy Silt				
Date Collected	1/14/2009	1/13/2009	1/14/2009	1/13/2009	1/13/2009	1/13/2009	1/14/2009	1/13/2009	1/14/2009	1/13/2009				
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg				
Laboratory Parameters														
VOCs 8260B														
											mg/kg			
1,2,4-Trimethylbenzene	35	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	67	280	13	-----
1,2-Dichloroethane	<0.37	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	0.45	2.2	0.45	-----
1,2-Dichloropropane	<0.37	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	0.93	4.7	0.93	-----
1,3,5-Trimethylbenzene	6.3	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	47	200	NS	-----
Acetone	<1.5	<0.078	<0.057	<0.050	<0.048	<0.060	NA	NA	NA	0.045	61,000	610,000	12,000	-----
Benzene	<0.37	<0.0047	<0.0034	<0.0030	<0.0029	<0.0036	NA	NA	NA	<0.0026	1.1	5.6	1.1	-----
Chloroform	<0.37	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	0.3	1.5	0.3	-----
Ethylbenzene	1.6	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	5.7	29	5.7	-----
Isopropyl ether (IPE)	<0.37	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	1,200	5,100	NS	-----
Isopropylbenzene	3.1	<0.0078	<0.0057	<0.0050	0.024	<0.0060	NA	NA	NA	<0.0043	2,200	11,000	310	-----
m,p-Xylenes	1.3	<0.016	<0.011	<0.010	<0.0096	<0.012	NA	NA	NA	<0.0086	4,500	19,000	440	-----
Methyl tert-butyl ether (MTBE)	<0.37	<0.016	<0.011	<0.010	<0.0096	<0.012	NA	NA	NA	<0.0086	39	190	39	-----
n-Butylbenzene	12	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	NS	NS	NS	-----
n-Propylbenzene	12	<0.0078	<0.0057	<0.0050	0.0073	<0.0060	NA	NA	NA	<0.0043	NS	NS	NS	-----
Naphthalene	1.2	<0.016	<0.011	<0.010	<0.0096	<0.012	NA	NA	NA	<0.0086	3.9	20	3.9	-----
o-Xylenes	<0.37	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	5,300	23,000	300	-----
p-Isopropyltoluene	2.7	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	NS	NS	NS	-----
sec-Butylbenzene	4.3	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	NS	NS	NS	-----
Styrene	<0.37	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	6,500	38,000	1,000	-----
tert-Butylbenzene	<0.37	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	NS	NS	NS	-----
Toluene	<0.37	<0.0078	<0.0057	<0.0050	<0.0048	<0.0060	NA	NA	NA	<0.0043	5,000	46,000	930	-----
Xylenes, total ⁵	1.3	<0.016	<0.011	<0.010	<0.0096	<0.012	NA	NA	NA	<0.0086	600	2,600	120	-----
SVOCs 8270C														
2-Methylnaphthalene	2.5	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	310	4,100	62	-----
Acenaphthene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	3,400	33,000	680	-----
Anthracene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	17,000	170,000	3,400	-----
Benzo(a)anthracene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	0.15	2.1	0.15	-----
Benzo(a)pyrene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	0.015	0.21	0.015	-----
Benzo(b)fluoranthene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	0.15	2.1	0.15	-----
Benzo(g,h,i)perylene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	NS	NS	NS	-----
Benzo(k)fluoranthene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	1.5	21	1.5	-----
Bis(2-ethylhexyl)phthalate	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	0.55	<0.43	<0.37	35	120	35	-----
Butylbenzylphthalate	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	260	910	260	-----
Chrysene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	15	210	15	-----
Di-n-butylphthalate	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	6,100	62,000	1,200	-----
Di-n-octylphthalate	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	NS	NS	NS	-----
Dibenzo(a,h)anthracene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	0.015	0.21	0.015	-----
Dibenzofuran	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	NS	NS	NS	-----
Fluoranthene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	2,300	22,000	460	-----
Fluorene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	2,300	22,000	460	-----
Indeno(1,2,3-cd)pyrene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	0.15	2.1	0.15	-----
Naphthalene	1.8	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	3.9	20	3.9	-----
Phenanthrene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	NS	NS	NS	-----
Pyrene	<0.52	<5.1	<0.41	<0.39	<0.40	<0.45	NA	<0.37	<0.43	<0.37	1,700	17,000	340	-----
Metals 6010B														
Arsenic	<0.79	15	1.6	<0.59	NA	80	NA	NA	NA	3.0	0.39	1.6	4.4	1.6-180
Barium	270	35	220	91	NA	290	NA	NA	NA	130	15,000	190,000	3,000	4.1-420
Cadmium	<0.39	0.4	<0.31	<0.30	NA	<0.34	NA	NA	NA	0.52	70	810	14.0	0.54-5.8
Chromium	99	8.4	27	13	NA	12	NA	NA	NA	28	280	1400	24,000	2 - 150
Lead	6.5	20	23	5.5	NA	3.3	NA	NA	NA	84	400	800	400	7.2 - 52
Selenium	12	2.4	4.3	2.1	NA	6.9	NA	NA	NA	3.0	390	5,100	78	NS
Silver	<0.39	<0.39	0.31	<0.30	NA	0.36	NA	NA	NA	8.6	390	5,100	78	NS
Metals 7471A														
Mercury	0.044	<0.031	0.029	<0.024	NA	<0.027	NA	NA	NA	0.32	6.7	28	1.3	0.02-0.16
MADEP-VPH														
C5-C8 Aliphatics	NA	NA	NA	NA	NA	NA	<7.7	NA	NA	NA	NS	NS	NS	-----
C9-C10 Aromatics	NA	NA	NA	NA	NA	NA	<7.7	NA	NA	NA	NS	NS	NS	-----
C9-C12 Aliphatics	NA	NA	NA	NA	NA	NA	<7.7	NA	NA	NA	NS	NS	NS	-----
MADEP-EPH														
C11-C22 Aromatics	NA	NA	NA	NA	NA	NA	<15	<11	<13	NA	NS	NS	NS	-----
C19-C36 Aliphatics	NA	NA	NA	NA	NA	NA	<15	<11	<13	NA	NS	NS	NS	-----
C9-C18 Aliphatics	NA	NA	NA	NA	NA	NA	<15	<11	<13	NA	NS	NS	NS	-----
Pesticides 8081A														
Organochloride Pesticides	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS	NS	NS	-----

1) EPA RSL = Environmental Protection Agency Regional Screening Levels for Chemical Contaminants at Superfund Sites (September 2008)

2) NCDENR inactive Hazardous Sites Branch, Health Based Soil Remediation Goals, October, 2008, "Adapted from the 2008 USEPA Regional Screening Tables"

3) NC DENR Data Table, Background Metals in NC Soils and Groundwater, August 31, 2006

4) NS = Not Specified, BRL = Beneath Reporting Limit; NA = Not Analyzed

5) Combined O-, M- and P- Xylenes

6) Detections shown in **Bold type**

7) Shaded values exceed the NC DENR Health Based SRG for the compound shown

Table 2 - Revision 1
 Summary Analytical Data - Soil
 Brownfield Phase II Site Assessment
 Former Lexington Home Brands - Plant 1
 Lexington, North Carolina
 H&H Job No. PTC-003

Boring Location	AREA 1														AREA 2	Screening Levels			
	Sample ID	SB-16	SB-17	SB-20	SB-15	SB-21	SB-22	SB-23	SB-23	SB-24	MW-1A	MW-2A	MW-3A	MW-4A	SB-27 ⁸	EPA RSL ¹		NCDENR (Soils)	
Sample Depth (ft)	2'	1'	0-1'	1'	0-1'	0-1'	0-1'	0-1'	2-3'	1'	2'	1'	1'	2'	8-9'	Residential	Industrial	Health Based SRG ²	NCDENR Background Range ³
Lithology	Silty Sand	Silty Sand	Sandy Clay	Sandy Silt	Coarse Sand	Silty Clay	Silty Sand	Silty Sand	Clayey Sand	Sandy Silt	Sandy Clay	Sandy Clay	Sandy Clay	Sandy Silt					
Date Collected	1/14/2009	1/14/2009	1/13/2009	1/14/2009	1/13/2009	1/13/2009	1/13/2009	1/13/2009	1/13/2009	1/13/2009	1/12/2009	1/12/2009	1/12/2009	1/12/2009	1/13/2009				
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg				
Laboratory Parameters																			
VOCs 8260B																			
mg/kg																			
1,2,4-Trimethylbenzene	0.024	0.0089	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	0.014	0.04	67	280	13	----	
1,2-Dichloroethane	<0.0062	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	<0.0057	<0.0055	0.45	2.2	0.45	----	
1,2-Dichloropropane	<0.0062	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	<0.0057	<0.0055	0.93	4.7	0.93	----	
1,3,5-Trimethylbenzene	<0.0062	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	<0.0057	0.0061	47	200	NS	----	
Acetone	<0.062	0.27	<0.076	<0.074	<0.056	<0.070	<0.064	<0.051	<0.054	<0.049	<0.041	<0.043	<0.057	<0.055	61,000	610,000	12,000	----	
Benzene	0.1	0.0095	<0.0046	0.0054	<0.0034	<0.0042	<0.038	<0.0031	<0.0032	<0.0030	<0.0025	<0.0026	0.0055	0.013	1.1	5.6	1.1	----	
Chloroform	<0.0062	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	<0.0057	<0.055	0.3	1.5	0.3	----	
Ethylbenzene	0.021	0.01	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	0.0084	0.14	5.7	29	5.7	----	
Isopropyl ether (IPE)	<0.0062	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	<0.0057	<0.0055	1,200	5,100	NS	----	
Isopropylbenzene	0.059	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	<0.0057	<0.0055	2,200	11,000	310	----	
m,p-Xylenes	0.1	0.069	<0.015	<0.015	<0.011	<0.014	<0.013	<0.01	<0.011	<0.0099	<0.0082	<0.0086	0.059	0.028	4,500	19,000	440	----	
Methyl tert-butyl ether (MTBE)	<0.012	<0.016	<0.015	<0.015	<0.011	<0.014	<0.013	<0.01	<0.011	<0.0099	<0.0082	<0.0086	<0.011	<0.011	39	190	39	----	
n-Butylbenzene	<0.0062	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	0.045	0.014	NS	NS	NS	----	
n-Propylbenzene	0.014	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	0.081	0.13	NS	NS	NS	----	
Naphthalene	<0.012	<0.016	<0.015	<0.015	<0.011	<0.014	<0.013	<0.01	<0.011	<0.0099	<0.0082	<0.0086	5.9	0.049	3.9	20	3.9	----	
o-Xylenes	0.017	0.014	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	0.0076	0.0094	5,300	23,000	300	----	
p-Isopropyltoluene	<0.0062	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	0.022	<0.0055	NS	NS	NS	----	
sec-Butylbenzene	<0.0062	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	0.041	0.019	NS	NS	NS	----	
Styrene	<0.0062	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	<0.0057	<0.0055	6,500	38,000	1,000	----	
tert-Butylbenzene	<0.0062	<0.0081	<0.0076	<0.0074	<0.0056	<0.0070	<0.0064	<0.0051	<0.0054	<0.0049	<0.0041	<0.0043	0.012	<0.0055	NS	NS	NS	----	
Toluene	0.13	0.06	<0.0076	0.01	<0.0056	<0.0070	<0.0064	<0.0051	0.0085	<0.0049	<0.0041	<0.0043	0.025	0.077	5,000	46,000	930	----	
Xylenes, total ⁵	0.117	0.114	<0.015	<0.015	<0.011	<0.014	<0.013	<0.01	<0.011	<0.0099	<0.0082	<0.0086	0.0666	0.0374	600	2,600	120	----	
SVOCs 8270C																			
2-Methylnaphthalene	<0.42	<0.43	<0.41	<0.40	1.6	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	310	4,100	62	----	
Acenaphthene	<0.42	<0.43	<0.41	<0.40	2.0	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	3,400	33,000	680	----	
Anthracene	<0.42	<0.43	<0.41	<0.40	3.1	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	17,000	170,000	3,400	----	
Benzo(a)anthracene	<0.42	<0.43	<0.41	0.40 H	8.8	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	0.15	2.1	0.15	----	
Benzo(a)pyrene	<0.42	<0.43	<0.41	0.43 H	8.3	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	0.015	0.21	0.015	----	
Benzo(b)fluoranthene	<0.42	<0.43	<0.41	0.54 H	12	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	0.15	2.1	0.15	----	
Benzo(g,h,i)perylene	<0.42	<0.43	<0.41	0.46 H	4.2	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	NS	NS	NS	----	
Benzo(k)fluoranthene	<0.42	<0.43	<0.41	<0.40	3.4	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	1.5	21	1.5	----	
Bis(2-ethylhexyl)phthalate	<0.42	<0.43	15	1.9 H	190	5.3	7	0.45	130	<0.42	<0.38	<0.38	1.4	NA	35	120	35	----	
Butylbenzylphthalate	<0.42	<0.43	<0.41	<0.40	<0.42	<0.39	<0.35	<0.37	0.4	<0.42	<0.38	<0.38	<0.43	NA	260	910	260	----	
Chrysene	<0.42	<0.43	<0.41	<0.40	8.5	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	15	210	15	----	
Di-n-butylphthalate	<0.42	<0.43	0.66	0.52	0.97	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	6,100	62,000	1,200	----	
Di-n-octylphthalate	<0.42	<0.43	1.7	<0.40	<0.42	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	NS	NS	NS	----	
Dibenzo(a,h)anthracene	<0.42	<0.43	<0.41	<0.40	1.1	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	0.015	0.21	0.015	----	
Dibenzofuran	<0.42	<0.43	<0.41	<0.40	2.0	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	NS	NS	NS	----	
Fluoranthene	<0.42	<0.43	<0.41	0.57	24	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	2,300	22,000	460	----	
Fluorene	<0.42	<0.43	<0.41	<0.40	1.9	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	2,300	22,000	460	----	
Indeno(1,2,3-cd)pyrene	<0.42	<0.43	<0.41	0.42 H	4.5	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	0.15	2.1	0.15	----	
Naphthalene	<0.42	<0.43	<0.41	<0.40	6.1	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	3.9	20	3.9	----	
Phenanthrene	<0.42	<0.43	<0.41	0.43	23	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	NS	NS	NS	----	
Pyrene	<0.42	<0.43	<0.41	0.76	19	<0.39	<0.35	<0.37	<0.37	<0.42	<0.38	<0.38	<0.43	NA	1,700	17,000	340	----	
Metals 6010B																			
Arsenic	1.3	<0.65	NA	2.7	NA	NA	2.9	<0.57	NA	0.76	1.8	1.0	2.4	NA	0.39	1.6	4.4	1.6-180	
Barium	100	120	NA	130	NA	NA	97	270	NA	520	85	43	68	NA	15,000	190,000	3,000	4.1-420	
Cadmium	<0.32	<0.33	NA	0.4	NA	NA	<0.27	<0.28	NA	<0.32	<0.29	<0.29	<0.33	NA	70	810	14.0	0.54-5.8	
Chromium	31	36	NA	30	NA	NA	19	<0.28	NA	50	24	24	46	NA	280	1400	24,000	2 - 150	
Lead	10	5.3	NA	6.2	NA	NA	21	5.2	NA	4.8	6.4	4.9	14	NA	400	800	400	7.2 - 52	
Selenium	7.0	2.9	NA	5.7	NA	NA													

Table 2 - Revision 1
Summary Analytical Data - Soil
Brownfield Phase II Site Assessment
Former Lexington Home Brands - Plant 1
Lexington, North Carolina
H&H Job No. PTC-003

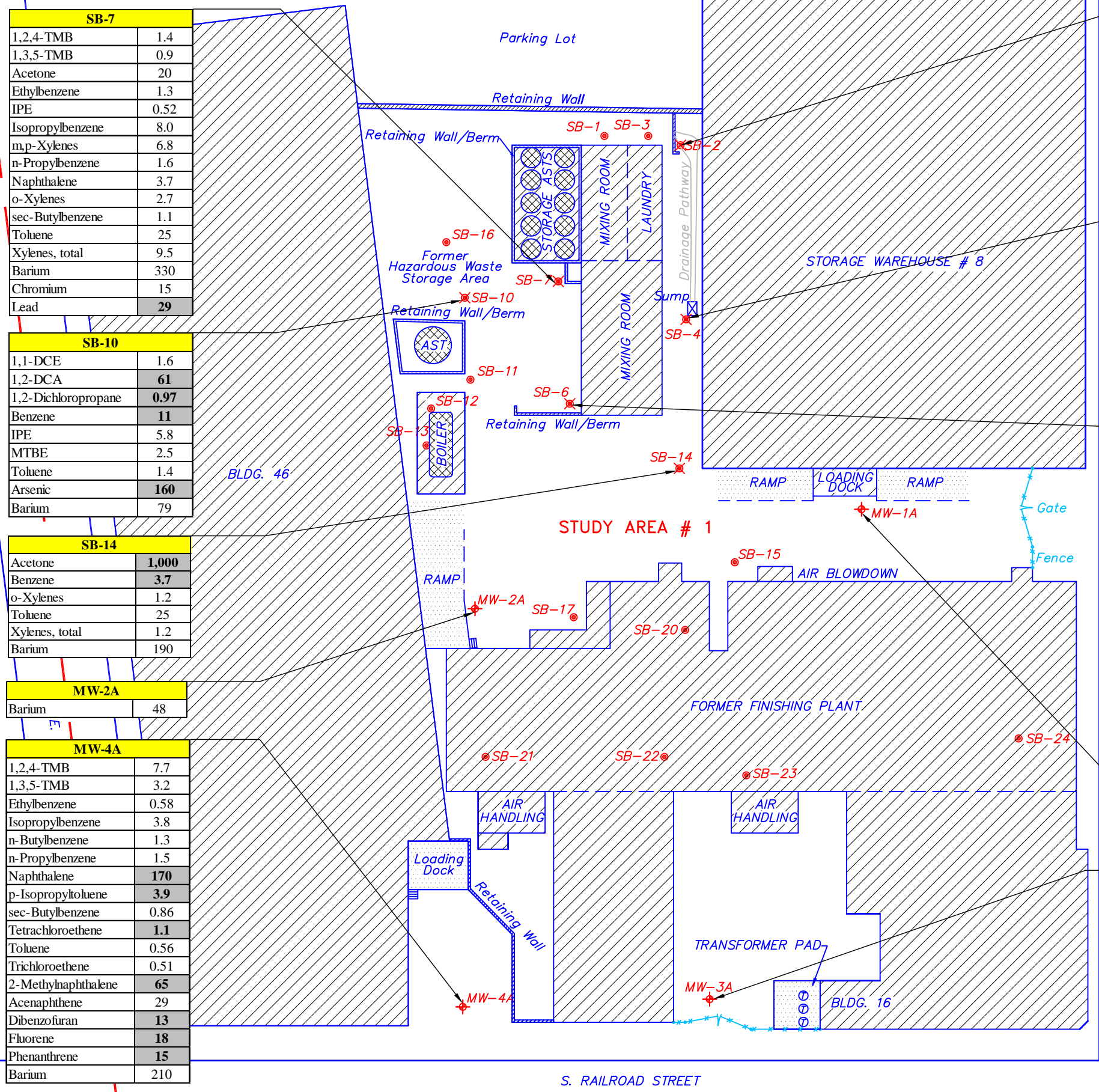
Boring Location	Area 3													Screening Levels					
	Sample ID	SB-28	SB-29	SB-30	SB-31	SB-32	SB-33	SB-34	SB-35	SB-36	SB-37	SB-38 ⁸	SB-39	SB-40	EPA RSL ¹	NCDENR (Soils)	Residential	Industrial	Health Based SRG ²
Sample Depth (ft)	14-15'	14-15'	3'	3'	3'	3'	3'	10-11'	3'	3'	3'	3'	3'						
Lithology	Sandy Silt	Sandy Silt	Sandy Silt	Sandy Silt	Sandy Silt	Sandy Silt	Sandy Silt	Sandy Silt	Sandy Silt	Sandy Silt	Sandy Silt	Sandy Silt	Silty Sand	Sandy Silt					
Date Collected	1/14/2009	1/13/2009	1/14/2009	1/14/2009	1/14/2009	1/14/2009	1/14/2009	1/14/2009	1/13/2009	1/14/2009	1/14/2009	1/14/2009	1/14/2009	1/14/2009					
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg					
Laboratory Parameters																			
VOCs 8260B															mg/kg				
1,1,1-Trichloroethane	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	9,000	39,000	680	-----		
1,1-Dichloroethane	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	3.4	17	3.4	-----		
1,1-Dichloroethene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	250	1,100	50	-----		
1,2,4-Trimethylbenzene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	67	280	13	-----		
1,2-Dichloroethane	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	0.45	2.2	0.45	-----		
1,2-Dichloropropane	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	0.93	4.7	0.93	-----		
1,3,5-Trimethylbenzene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	47	200	NS	-----		
Acetone	NA	NA	NA	NA	<0.055	<0.049	<0.062	<0.078	<0.056	<0.049	NA	<0.057	<0.049	61,000	610,000	12,000	-----		
Benzene	NA	NA	NA	NA	<0.0033	<0.0030	<0.0037	<0.0047	<0.0033	<0.0029	NA	<0.0034	<0.0030	1.1	5.6	1.1	-----		
Chloroform	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	0.3	1.5	0.3	-----		
Ethylbenzene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	5.7	29	5.7	-----		
Isopropyl ether (IPE)	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	1,200	5,100	NS	-----		
Isopropylbenzene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	2,200	11,000	310	-----		
m,p-Xylenes	NA	NA	NA	NA	<0.011	<0.0099	<0.012	<0.016	<0.011	<0.0098	NA	<0.011	<0.0098	4,500	19,000	440	-----		
Methyl tert-butyl ether (MTBE)	NA	NA	NA	NA	<0.011	<0.0099	<0.012	<0.016	<0.011	<0.0098	NA	<0.011	<0.0098	39	190	39	-----		
n-Butylbenzene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	NS	NS	NS	-----		
n-Propylbenzene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	NS	NS	NS	-----		
Naphthalene	NA	NA	NA	NA	<0.011	<0.0099	<0.012	<0.016	<0.011	<0.0098	NA	<0.011	<0.0098	3.9	20	3.9	-----		
o-Xylenes	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	5,300	23,000	300	-----		
p-Isopropyltoluene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	NS	NS	NS	-----		
sec-Butylbenzene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	NS	NS	NS	-----		
Styrene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	6,500	38,000	1,000	-----		
tert-Butylbenzene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	NS	NS	NS	-----		
Toluene	NA	NA	NA	NA	<0.0055	<0.0049	<0.0062	<0.0078	<0.0056	<0.0049	NA	<0.0057	<0.0049	5,000	46,000	930	-----		
Xylenes, total ⁵	NA	NA	NA	NA	<0.011	<0.0099	<0.012	<0.016	<0.011	<0.0098	NA	<0.0057	<0.0098	600	2,600	120	-----		
SVOCs 8270C																			
2-Methylnaphthalene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	310	4,100	62	-----		
Acenaphthene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	3,400	33,000	680	-----		
Anthracene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	17,000	170,000	3,400	-----		
Benzo(a)anthracene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	0.15	2.1	0.15	-----		
Benzo(a)pyrene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	0.015	0.21	0.015	-----		
Benzo(b)fluoranthene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	0.15	2.1	0.15	-----		
Benzo(g,h,i)perylene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	NS	NS	NS	-----		
Benzo(k)fluoranthene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	1.5	21	1.5	-----		
Bis(2-ethylhexyl)phthalate	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	35	120	35	-----		
Butylbenzylphthalate	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	260	910	260	-----		
Chrysene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	15	210	15	-----		
Di-n-butylphthalate	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	6,100	62,000	1,200	-----		
Di-n-octylphthalate	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	NS	NS	NS	-----		
Dibenzo(a,h)anthracene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	0.015	0.21	0.015	-----		
Dibenzofuran	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	NS	NS	NS	-----		
Fluoranthene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	2,300	22,000	460	-----		
Fluorene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	2,300	22,000	460	-----		
Indeno(1,2,3-cd)pyrene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	0.15	2.1	0.15	-----		
Naphthalene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	3.9	20	3.9	-----		
Phenanthrene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	NS	NS	NS	-----		
Pyrene	<0.37	<0.37	<0.40	<0.41	<0.38	<1.9	<0.43	NA	<0.45	<0.42	<0.39	<0.37	<0.37	1,700	17,000	340	-----		
Metals 6010B																			
Arsenic	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.39	1.6	4.4	1.6-180		
Barium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	15,000	190,000	3,000	4.1-420		
Cadmium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	70	810	14.0	0.54-5.8		
Chromium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	280	1400	24,000	2 - 150		
Lead	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	400	800	400	7.2 - 52		
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	390	5,100	78	NS		
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	390	5,100	78	NS		
Metals 7471A																			
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	6.7	28	1.3	0.02-0.16		
MADEP-VPH																			
C5-C8 Aliphatics	NA	NA	NA	NA	NA	NA	NA	NA	<7.6	NA	NA	NA	NA	NS	NS	NS	-----		
C9-C10 Aromatics	NA	NA	NA	NA	NA	NA	NA	NA	<7.6	NA	NA	NA	NA	NS	NS	NS	-----		
C9-C12 Aliphatics	NA	NA	NA	NA	NA	NA	NA	NA	<7.6	NA	NA	NA	NA	NS	NS	NS	-----		
MADEP-EPH																			
C11-C22 Aromatics	<11	<11	<12	<12	NA	NA	NA	NA	NA	NA	42	NA	NA	NS	NS	NS	-----		
C19-C36 Aliphatics	<11	<11	<12	<1															

Table 4 - Revision 1
Summary of Analytical Data - Groundwater
Brownfield Phase II Site Assessment
Former Lexington Home Brands - Plant 1
Lexington, North Carolina
H&H Job No. PTC-002

Sample Location	Area 1						Area 2	Area 3			Area 1 - Permanent Wells				Screening Levels		
	SB-2	SB-4	SB-6	SB-7	SB-10	SB-14	SB-27	SB-29	SB-35	MW-1A	MW-2A	MW-3A	MW-4A	NC DENR 2L Limit	Federal MCL	Target GW Concentrations for Vapor Intrusion Range	
Date Collected	1/14/2009	1/14/2009	1/14/2009	1/14/2009	1/14/2009	1/14/2009	1/14/2009	1/14/2009	1/14/2009	1/23/2009	1/23/2009	1/23/2009	1/23/2009				
Units	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L				
Laboratory Parameters																	
VOCs 8260B														µg/L			
1,1,1-Trichloroethane	1.2	<0.5	<5.0	<0.5	<0.5	<0.5	<2.0	NA	<0.5	<0.5	<0.5	<0.5	<0.5	200	200	3,100 to 3,100	
1,1-Dichloroethane	0.59	<0.5	<5.0	<0.5	<0.5	<0.5	<2.0	NA	<0.5	<0.5	<0.5	<0.5	<0.5	70	NS	2,200 to 2,200	
1,1-Dichloroethene	1.1	<0.5	<5.0	<0.5	1.6	<0.5	<2.0	NA	<0.5	<0.5	<0.5	<0.5	<0.5	7	7	190 to 190	
1,2,4-Trimethylbenzene	<1.0	<1.0	45	1.4	<1.0	<1.0	810	NA	1.3	<0.5	<0.5	<0.5	<0.5	350	NS		
1,2-Dichloroethane	7.8	<0.5	<5.0	<0.5	61	<0.5	25	NA	<0.5	<0.5	<0.5	<0.5	<0.5	0.38	5	5 to 230	
1,2-Dichloropropane	<0.5	<0.5	<5.0	<0.5	0.97	<0.5	<2.0	NA	<0.5	<0.5	<0.5	<0.5	<0.5	0.51	5		
1,3,5-Trimethylbenzene	<0.5	<0.5	22	0.9	<0.5	<0.5	230	NA	<0.5	<0.5	<0.5	<0.5	<0.5	350	NS		
Acetone	<5.0	<5.0	130	20	<5.0	1,000	<200	NA	<5.0	<5.0	<5.0	<5.0	<5.0	700	NS		
Benzene	46	0.55	22	<0.5	11	3.7	4,800	NA	<0.5	<0.5	<0.5	<0.5	<0.5	1	5	5 to 140	
Chloroform	<0.5	<0.5	<5.0	<0.5	<0.5	<0.5	<2.0	NA	1.5	<0.5	<0.5	<0.5	<0.5	70	NS		
Ethylbenzene	<0.5	<0.5	360	1.3	<0.5	<0.5	1,100	NA	<0.5	<0.5	<0.5	<0.5	0.58	550	700	700 to 700	
Isopropyl ether (IPE)	1.2	<0.5	<5.0	0.52	5.8	<0.5	71	NA	<0.5	<0.5	<0.5	<0.5	<0.5	70	NS		
Isopropylbenzene	1.3	1.4	47	8.0	<0.5	<0.5	83	NA	<0.5	<0.5	<0.5	<0.5	<0.5	70	NS		
m,p-Xylenes	<1.0	<1.0	2,000	6.8	<1.0	<1.0	770	NA	<1.0	<1.0	<1.0	<1.0	<1.0	530	NS		
Methyl tert-butyl ether (MTBE)	29	<0.5	<5.0	<0.5	2.5	<0.5	870	NA	<0.5	<0.5	<0.5	<0.5	<0.5	200	NS	120,000 to 120,000	
n-Butylbenzene	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	66	NA	<1.0	<1.0	<1.0	<1.0	<1.0	70	NS		
n-Propylbenzene	<0.5	<0.5	17	1.6	<0.5	<0.5	240	NA	<0.5	<0.5	<0.5	<0.5	<0.5	70	NS		
Naphthalene	<2.0	<2.0	39	3.7	<2.0	<2.0	600	NA	<2.0	<2.0	<2.0	<2.0	170	21	NS	150 to 150	
o-Xylenes	<0.5	1.2	200	2.7	<0.5	1.2	58	NA	<0.5	<0.5	<0.5	<0.5	<0.5	530	NS		
p-Isopropyltoluene	<0.5	<0.5	<5.0	<0.5	<0.5	<0.5	42	NA	<0.5	<0.5	<0.5	<0.5	<0.5	3.9	NS		
sec-Butylbenzene	<0.5	<0.5	10	1.1	<0.5	<0.5	49	NA	<0.5	<0.5	<0.5	<0.5	<0.5	0.86	70	NS	
Styrene	<0.5	<0.5	10	<0.5	<0.5	<0.5	<2.0	NA	<0.5	<0.5	<0.5	<0.5	<0.5	100	100		
tert-Butylbenzene	<0.5	<0.5	<5.0	<0.5	<0.5	<0.5	<2.0	NA	<0.5	<0.5	<0.5	<0.5	<0.5	70	NS		
Tetrachloroethene	<0.5	<0.5	<5.0	<0.5	<0.5	<0.5	<2.0	NA	<0.5	<0.5	<0.5	<0.5	1.1	0.7	5		
Toluene	<0.5	2.6	30	25	1.4	25	77	NA	0.94	6.4	<0.5	0.71	0.56	1,000	1,000	1,500 to 1,500	
Trichloroethene	<0.5	<0.5	<5.0	<0.5	<0.5	<0.5	<2.0	NA	<0.5	<0.5	<0.5	<0.5	<0.5	0.51	2.8	5	
Xylenes, total	<1.0	1.2	2,200	9.5	<1.0	1.2	828	NA	<1.0	<1.0	<1.0	<1.0	<1.0	530	10,000	NS	
SVOCs 8270C																	
2-Methylnaphthalene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	65	14	NS	3,300 to 3,300	
Acenaphthene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	29	80	NS	NS	
Anthracene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	2,100	NS	NS	
Benzo(a)anthracene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	0.0479	NS	NS	
Benzo(a)pyrene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	0.00479	0.2	NS	
Benzo(b)fluoranthene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	0.0479	NS	NS	
Benzo(g,h,i)perylene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	210	NS	NS	
Benzo(k)fluoranthene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	0.479	NS	NS	
Bis(2-ethylhexyl)phthalate	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	2.5	6	NS	
Butylbenzylphthalate	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	100	NS	NS	
Chrysene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	4.79	NS	NS	
Di-n-butylphthalate	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	700	NS	NS	
Di-n-octylphthalate	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	140	NS	NS	
Dibenzo(a,h)anthracene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	0.0047	NS	NS	
Dibenzofuran	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	13	28	NS	NS	
Fluoranthene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	280	NS	NS	
Fluorene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	18	280	NS	NS	
Indeno(1,2,3-cd)pyrene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	0.0479	NS	NS	
Naphthalene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	35	21	NS	150 to 150	
Phenanthrene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	15	210	NS	NS	
Pyrene	<10	<10	<11	<10	<11	<10	NA	<11	NA	<10	<9.7	<10	<10	210	NS	NS	
Metals 6010B																	
Arsenic	<10	27	<10	<10	160	<10	NA	NA	NA	<10	<10	<10	<10	50	10	NS	
Barium	93	330	110	330	79	190	NA	NA	NA	140	48	55	210	2,000	2,000	NS	
Cadmium	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	NA	NA	NA	<1	<1.0	<1	<1	1.75	5	NS	
Chromium	<5.0	22	8.2	15	<5.0	<5.0	NA	NA	NA	10	<5.0	<5	<5	50	NS	NS	
Lead	<5.0	55	5	29	<5.0	<5.0	NA	NA	NA	<5	<5.0	<5	<5	15	2	NS	
Selenium	<20	<20	<20	<20	<20	<20	NA	NA	NA	<20	<20	<20	<20	50	50	NS	
Silver	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	<5	<5	<5	<5	17.5	NS	NS	
Metals 7471A																	
Mercury	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	NA	NA	NA	<0.2	<0.2	<0.2	<0.2	1.05	2	NS	
MADEP-VPH																	
C5-C8 Aliphatics	NA	NA	NA	NA	NA	NA	15,000	NA	<50	NA	NA	NA	NA	420	NS	NS	
C9-C10 Aromatics	NA	NA	NA	NA	NA	NA	840	NA	<50	NA	NA	NA	NA	210	NS	NS	
C9-C12 Aliphatics	NA	NA	NA	NA	NA	NA	4,100	NA	<50	NA	NA	NA	NA	4,200	NS	NS	
MADEP-EPH																	
C11-C22 Aromatics	NA	NA	NA	NA	NA	NA	NA	<100	NA	NA	NA	NA	NA	210	NS	NS	
C19-C36 Aliphatics	NA	NA	NA	NA	NA	NA	NA	<100	NA	NA	NA	NA	NA	42,000	NS	NS	
C9-C18 Aliphatics	NA	NA	NA	NA	NA	NA	NA	<100	NA	NA	NA	NA	NA	4,200	NS	NS	
Pesticides 8081A																	
Organochloride Pesticides	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	BRL	BRL				

1. NC DENR 2L Limit = Maximum Contaminant Concentration defined by North Carolina Administrative Code (NCAC) Title 15A, Subchapter 2L, Section .0202 (Water Quality Standards for Class GA Groundwater).
2. MCL = Maximum Contaminant Level
3. EPA RSL = US Environmental Protection Agency Regional Screening Levels for Chemical Contaminants at Superfund Sites (September, 2008)
4. Target groundwater concentration corresponding to target indoor air generic screening levels (EPA OSWER 2002); Low and high range for Risk=1x10⁻⁵ and 1x10⁻⁶
5. VOCs= Volatile Organic Compounds; SVOCs - Semi-volatile Organic Compounds; PAHs - Polynuclear Aromatic Hydrocarbons; NA - Not Analyzed; NS - Not Specified
J = Estimated value - analyte detected at a concentration less than the reporting limit and greater than or equal to the method detection limit.
M = Surrogate recoveries or matrix spike recoveries were outside control limits due to suspected matrix interference.
E = Estimated concentration greater than the instrument calibration range

S:\AAA-Master Projects\Piedmont Triad COG - PTC\PTC-003 Brownfield Phase II\Figures\PTC-003 Phase II Figs 8 and 9.dwg, LHB Phase II Figure 8, 6/26/2009 10:51:34 AM



SB-7	
1,2,4-TMB	1.4
1,3,5-TMB	0.9
Acetone	20
Ethylbenzene	1.3
IPE	0.52
Isopropylbenzene	8.0
m,p-Xylenes	6.8
n-Propylbenzene	1.6
Naphthalene	3.7
o-Xylenes	2.7
sec-Butylbenzene	1.1
Toluene	25
Xylenes, total	9.5
Barium	330
Chromium	15
Lead	29

SB-10	
1,1-DCE	1.6
1,2-DCA	61
1,2-Dichloropropane	0.97
Benzene	11
IPE	5.8
MTBE	2.5
Toluene	1.4
Arsenic	160
Barium	79

SB-14	
Acetone	1,000
Benzene	3.7
o-Xylenes	1.2
Toluene	25
Xylenes, total	1.2
Barium	190

MW-2A	
Barium	48

MW-4A	
1,2,4-TMB	7.7
1,3,5-TMB	3.2
Ethylbenzene	0.58
Isopropylbenzene	3.8
n-Butylbenzene	1.3
n-Propylbenzene	1.5
Naphthalene	170
p-Isopropyltoluene	3.9
sec-Butylbenzene	0.86
Tetrachloroethene	1.1
Toluene	0.56
Trichloroethene	0.51
2-Methylnaphthalene	65
Acenaphthene	29
Dibenzofuran	13
Fluorene	18
Phenanthrene	15
Barium	210

SB-2	
1,1,1-TCA	1.2
1,1-DCA	0.59
1,1-DCE	1.1
1,2-DCA	7.8
Benzene	46
IPE	1.2
Isopropylbenzene	1.3
MTBE	29
Barium	93

SB-4	
Benzene	0.55
Isopropylbenzene	1.4
o-Xylenes	1.2
Toluene	2.6
Xylenes, total	1.2
Arsenic	27
Barium	330
Chromium	22
Lead	55

SB-6	
1,2,4-TMB	45
1,3,5-TMB	22
Acetone	130
Benzene	22
Ethylbenzene	360
Isopropylbenzene	47
m,p-Xylenes	2,000
n-Propylbenzene	17
Naphthalene	39
o-Xylenes	200
sec-Butylbenzene	10
Styrene	10
Toluene	30
Xylenes, total	2,200
Barium	110
Chromium	8.2
Lead	5

MW-1A	
Toluene	6.4
Barium	140
Chromium	10

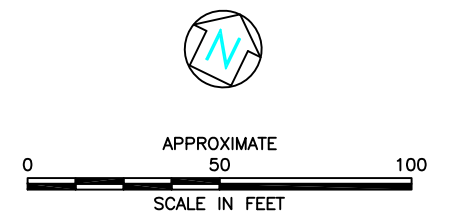
MW-3A	
Toluene	0.71
Barium	55


LEGEND

- SOIL BORING
- ⊗ TEMPORARY WELL
- ⊕ PERMANENT WELL

NOTES

Concentrations in ug/L.
Shaded values exceed NCDENR
2L Groundwater Standards



TITLE GROUNDWATER ANALYTICAL DATA STUDY AREA 1	
PROJECT PLANT 1 – LEXINGTON HOME BRANDS 411 S. SALISBURY STREET LEXINGTON, DAVIDSON COUNTY, NC	
 3334 Hillsborough Street Raleigh, North Carolina 27607 919-847-4241(p) 919-847-4261(f)	
DATE: 06/25/2009	REVISION NO. 1
JOB NO: PTC-003	FIGURE NO. 8

Appendix D

Laboratory Analytical Data and Data Validation Summary

Data Validation Summary

In accordance with the December, 2008 Site QAPP, the field and laboratory analytical data were subjected to review, verification, and validation to ensure that the quality and validity of the data were acceptable for the stated data quality objectives. A discussion of the field data, laboratory data, and variations from the procedures outlined in the approved QAPP for the subject site is presented below.

Field Procedures

The field procedures for sampling, decontamination, calibration, chain-of-custody forms, etc. were followed in accordance with the QAPP procedures, with seven (7) exceptions:

- The QAPP called for the sampling of five (5) existing monitoring wells within Study Area 2, associated with the former location of a 550 gallon gasoline UST from which a release was confirmed and later evaluated, independent of this Phase II SAR. It was discovered that these five wells had been abandoned prior to the initiation of Phase II Assessment activities; therefore, the wells were not sampled.
- The QAPP called for the collection of samples from soil borings SB-8 and SB-9, associated with the former locations of a 3,000 gallon thinner UST (SB-8) and a 7,000 gallon naphtha UST (SB-9). As groundwater was found to be less than 3 feet (ft) beneath land surface (bls), the collection of these samples from their target samples depths (13-14 ft bls for SB-8 and 7-8 ft bls in SB-9) would have yielded samples in the saturated zone, and the data for the samples would have been of no value. For this reason, neither of these borings were completed.
- The presence of groundwater at a shallow depth at the original intended location of boring SB-3 prompted the relocation of this boring adjacent to a drainage structure between borings SB-1 and SB-2.

- The QAPP called for the sampling of soils at the locations of soil borings SB-4 and 5. Groundwater was encountered within 1 foot of surface grade in each of these borings, therefore soil samples were not obtained.
- The QAPP called for the collection of samples from hand auger borings SB-18, 19, 25 and 26. Upon attempting to complete these borings, it was found that the crawl space of the former finishing plant was underlain by a concrete slab, therefore these samples were not obtained.
- The QAPP also called for the collection of two (2) samples from hand auger borings SB-20, 21, 22 and 24. Groundwater was found in each of these borings within 2 ft. of surface grade, therefore, only a single (shallow) soil sample was retained from these borings.
- The locations of borings SB-36 and 37 (originally slated for completion near the southeastern portion of the wood processing area in Study Area 3) were altered to evaluate the locations of two vaults located within the building. These vaults were not identified during the Phase I ESA, as they had been covered with equipment and/or debris which have since been removed.

A field audit was not performed due to the brevity and limited scope of sampling activities. Field audits were optional per the QAPP.

Laboratory Data

A review of the analytical laboratory data is provided below.

- Samples shipped to Prism Laboratories associated with this project were received at the laboratory in good condition, within the proper temperature range, were properly preserved, and proper sample volumes were available for analysis.
- Chain-of-custody protocol was properly maintained.
- The requested laboratory analyses were performed by the laboratory on each sample.

Ground Water Samples

- The laboratory supplied trip blank samples to accompany all groundwater samples submitted for the performance of this project. Each trip blank sample was analyzed by EPA Method 8260B. Data for trip blank samples associated with this project did not indicate the presence of targeted compounds at levels above the method reporting limit.
- No target compounds were reported above reporting limits in the method blanks for the ground water samples.
- Laboratory control samples and matrix spike samples for the water analyses were within laboratory control limits.
- For laboratory batch ID # Q38858, EPA Method 8270C groundwater analysis, the recovery for the matrix spike (MS) and matrix spike duplicate (MSD) samples associated with the compound pentachlorophenol were outside the control limits. The laboratory control sample (LCS) had acceptable recovery. The compound was not detected in any

samples submitted within the sample batch at levels exceeding the method reporting limit.

- For laboratory batch ID # Q38661, EPA Method 8270C groundwater analysis, the recovery for the matrix spike (MS) and matrix spike duplicate (MSD) samples associated with the compound pentachlorophenol were above the control limits. The laboratory control sample (LCS) had acceptable recovery. The compound was not detected in any samples submitted within the sample batch at levels exceeding the method reporting limit.
- For laboratory batch ID # Q38641, EPA Method 7471A groundwater analysis, the recovery for the matrix spike (MS) and matrix spike duplicate (MSD) samples associated with the element mercury were outside the control limits. The laboratory control sample (LCS) had acceptable recovery. The compound was not detected in any samples within the sample batch at levels exceeding the method reporting limit.

Soil Samples

- No target compounds were reported above reporting limits in the method blanks for the soil sample analyses associated with this project.
- Several compounds were reported with an “H” qualifier in the EPA 8270C analysis associated with sample SB-15. The “H” qualified indicates that the compounds were reported at estimated concentrations with a high bias. Analytes in this sample yielded results that were consistently higher than what was observed in internal standards (which produced area response below acceptable QC limits). Compounds detected in this sample may have otherwise been non-detect, because they were detected slightly above relative detection limits. Compounds benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and indeno(1,2,3-cd)pyrene were detected slightly above detection

limits, and were subsequently above relative SRGs. SRGs are less than detection limits for these compounds.

- For laboratory batch ID # Q38605, EPA Methods 8260B and 8270C soils analysis, MS and MSDs were not available for reporting. LCS has acceptable recoveries for each method.
- For laboratory batch ID # Q38578, MS for barium: The sample concentration was too high for recovery evaluation.
- For laboratory batch ID # Q38578, MS for chromium: The MS and MSD recovery were outside the control limits. Matrix interference is suspected. Post digestion spike recovery (72%) is outside the acceptable limits (80-120%).
- For laboratory batch ID # Q38578, MS for chromium: The MS and MSD recovery were outside the control limits. Matrix interference is suspected.
- For laboratory batch ID # Q38578, MSD for chromium: MSD recovery was outside the control limits.
- For laboratory batch ID # Q38578, MSD for lead: MSD recovery was outside the control limits.
- For laboratory batch ID # Q38598, LCS for mercury: No MS/MSD with batch - LCS had acceptable recovery.
- For laboratory batch ID # Q38673, MSD for mercury: MSD recovery was outside control limits. Serial dilution (5x) difference (25%) was greater than the control limit (10%). Post digestion spike recovery of 115% was well within acceptable control limits. Matrix interference suspected.

- For laboratory batch ID # Q38630, Method Blank (MB) for chromium and lead: MB was greater than ½ the reporting limit, but samples are greater than 10x the MB.
- For laboratory batch ID # Q38630, MS for arsenic, barium, cadmium, lead, selenium and silver: MS recovery was outside the control limits. Matrix interference is suspected.
- For laboratory batch ID # Q38630, MSD for arsenic, cadmium, chromium, lead, selenium and silver: MSD recovery was outside the control limits.

Review of laboratory data revealed a disparity between laboratory reporting limits and NCDENR Health-Based SRGs in soil samples analyzed for SVOCs. The disparity arose directly from reporting limits being greater than SRGs. This is noteworthy because SVOCs may have been present in soil samples at concentrations above SRGs yet below reporting limits (non-detect). The compounds that fall within this range are benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene, and indeno(1,2,3-cd)pyrene. After review of the data and laboratory consultation, it was found that for SVOCs analyzed by EPA Method 8270, standard detection limits result from the sensitivity of laboratory equipment and are intrinsically greater than the SRGs in question. Reporting limits for SVOCs found in the following appendix are the lowest limits the analytical method and laboratory equipment could produce.

Upon analytical data review, verification, and discussions with laboratory personnel, Hart & Hickman determines that these data are valid and useful for the purposes described in the QAPP.