# RISK MANAGEMENT PLAN

H&H JOB NO. DS0-1111 JUNE 4, 2024

# LUCAS CLEANERS

DSCA Site ID DC410049 803 Glenwood Avenue Greensboro, Guilford County, NC

North Carolina Dry-Cleaning Solvent Cleanup Act Program





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# Risk Management Plan Former Lucas Cleaners (DSCA Site ID DC410049) Greensboro, North Carolina <u>H&H Job No. DS0-1111</u>

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## Risk Management Plan Former Lucas Cleaners (DSCA Site ID DC410049) Greensboro, North Carolina <u>H&H Job No. DS0-1111</u>

### **1.0 Introduction**

Hart & Hickman, PC (H&H) has prepared this Risk Management Plan (RMP) to address drycleaning solvent contamination associated with the former Lucas Cleaners site (DSCA Site ID DC410049) on behalf of the North Carolina Department of Environmental Quality (NCDEQ), Dry-cleaning Solvent Cleanup Act (DSCA) Program. The source property for the former Lucas Cleaners dry-cleaning facility is located at 1101 West Gate City Boulevard in Greensboro, Guilford County, North Carolina, as shown on **Figure 1**. At the time when the dry-cleaning facility operated on the property, the property address was 803 Glenwood Avenue; however, the address was subsequently changed by Guilford County. Impacts associated with the former Lucas Cleaners site (herein referred to as the "site") are limited to one off-source property where groundwater impacts have been detected. The site is as follows:

- Source property State of North Carolina, 1101 West Gate City Boulevard, Parcel Identification Number (PIN) 7864026603
- Off-source property State of North Carolina, 1201 West Gate City Boulevard, PIN 7864022530

A map identifying the impacted off-source property is included as **Figure 2**. This RMP is intended to comply with the requirements of DSCA (N.C.G.S. 143-215.104A *et seqs*) and promulgated rules and follows the outline provided in the DSCA Program's risk-based corrective action (RBCA) guidance.

# 2.0 Objectives of Risk Management Plan

Historical assessment activities conducted prior to the site entering the DSCA Program identified tetrachloroethylene (PCE) in groundwater at concentrations above Title 15A NCAC 2L .0202 Groundwater Standards (2L Standards) within the footprint of the former Lucas Cleaners facility;



thus, attributing the observed contamination to a dry-cleaning solvent release from historical facility operations. The site entered the DSCA Program in July 2016 and has been redeveloped. Assessment activities completed by the DSCA Program at the former Lucas Cleaners site have not identified dry-cleaning related constituents in soil or groundwater on the source property. PCE was identified in groundwater on the downgradient, western-adjacent non-source property at concentrations above 2L standards. The current impacts are limited to the one off-source property.

H&H completed a risk assessment for the site in accordance with the DSCA Program's risk assessment procedures in June 2023. The results of the risk assessment indicate that there are risks that exceed target risk levels on the western-adjacent off-source property. These risks will be managed using site-specific land-use controls that have been selected as part of the risk assessment evaluation and which require an RMP. Thus, the objective of this RMP is to ensure that the site-specific land use conditions remain valid in the future.

#### 3.0 Summary of Risk Assessment Report

Based on the groundwater impacts above unrestricted use standards, H&H completed a risk assessment to determine the risks associated with human exposure to the dry-cleaning solvent impacts. This section provides a summary of the Risk Assessment, dated June 19, 2023, which recommended no further action status for the site with land-use controls for the affected off-source property.

The risk assessment consisted of evaluating exposure pathways for the following exposure units, which are shown on **Figures 3** and **4**:

- Exposure Unit #1 (EU#1) encompasses the entire source property where the former drycleaner operated. The source property currently consists of residential and retail spaces for University of North Carolina-Greensboro (UNCG).
- Exposure Unit #2 (EU#2) encompasses the entire non-source property located westsouthwest (downgradient) of the source property and overlying the groundwater plume. This property currently consists of residential and retail spaces for UNCG.



The protection of surface water and protection of groundwater use contaminant migration pathways were also evaluated as part of the risk assessment. The groundwater and soil gas data used in the risk assessment are shown on **Figures 3** and **4**. The results of the risk assessment are described below.

#### Exposure Unit #1

Complete exposure pathways identified for EU#1 include indoor inhalation of contaminants through vapor intrusion by a current or future resident or non-residential worker. The indoor air inhalation pathway was modeled for current and future risk using maximum concentrations detected in soil gas and the NCDEQ Risk Calculator. The results of the risk evaluation for EU #1 indicated no exceedances of acceptable risk levels for a current or future resident or non-residential worker. No chlorinated solvent constituents were detected in groundwater on the source property during DSCA's four quarterly sampling events as the groundwater plume has fully attenuated at this location; therefore, no land use controls are recommended for this exposure unit.

#### Exposure Unit #2

Complete exposure pathways identified for EU#2 include indoor inhalation of contaminants through vapor intrusion by a current or future non-residential worker or a future resident. This exposure pathway was modeled for current and future exposure scenarios using the maximum concentrations detected in soil gas and the NCDEQ Risk Calculator. The results of the risk evaluation for EU#2 did not indicate exceedances of acceptable risk levels. As groundwater is contaminated within EU#2, a land-use control preventing the use of groundwater is recommended, but no other controls appear warranted based on the risk assessment results.

#### Protection of Groundwater Use - Contaminant Migration Pathway

The protection of groundwater use pathway evaluates the potential for plume migration towards a downgradient current or future water supply well. The protection of groundwater use pathway was modeled assuming a point-of-exposure (POE) at the first property boundary downgradient of the groundwater plume where no groundwater impacts have been identified. The POE is located 312 feet from the groundwater source area and is identified on **Figure 3.** Modeling results for the protection of groundwater use evaluation indicated exceedances of Site-Specific Target Levels



(SSTLs) for source groundwater. However, the modeling is very conservative since it is based on the highest historical groundwater concentrations in the area of the former dry-cleaner and more recent data indicated no detectable chlorinated solvent constituents over four quarterly sampling events. In addition, as documented in a Groundwater Monitoring Report (GWMR) dated April 20, 2020, groundwater monitoring data indicate that the plume is stable and does not migrate as far as the modeling projects. If site conditions do not change, the current plume stability is not expected to change; therefore, the groundwater monitoring data and understanding of the plume migration are considered more relevant than the modeling results for evaluating this pathway. As such, the protection of groundwater use pathway is not considered a significant concern. In addition, a land use control related to maintenance of infiltration conditions is not warranted, because soil impacts have not been identified at the site.

#### Protection of Surface Water - Contaminant Migration Pathway

For the protection of surface water evaluation, the POE was determined to be Mile Run Creek, a North Carolina Class Water Supply V (WS-V); Nutrient Sensitive Waters (NSW) surface water body, located approximately 1,240 feet southwest of the groundwater source area. The POE location (i.e., Mile Run Creek) is identified on Figure 2. Modeling results for the protection of surface water evaluation indicated exceedances of SSTLs for source groundwater. However, as discussed above, the modeling is very conservative since it is based on the highest historical groundwater concentrations in the area of the former dry-cleaner and more recent data indicated no detectable chlorinated solvent constituents over four quarterly sampling events. In addition, as discussed in the April 2020 GWMR, monitoring data indicate that the plume is stable and does not migrate as far as the modeling projects. If site conditions do not change, the current plume stability is not expected to change; therefore, the groundwater monitoring data and understanding of the plume migration are considered more relevant than the modeling results for evaluating this pathway. Additionally, the leading edge of the groundwater plume remains approximately 950 feet from the surface water body and is unlikely to intersect the surface water body. Based on the groundwater sampling data, the protection of surface water pathway is not considered a significant concern.



Based on the results of this risk assessment, H&H concludes that the risks associated with the contamination at the site can be managed through implementation of land-use controls, as detailed in this RMP. Therefore, the risk assessment recommended risk-based closure for the site. The land-use controls proposed for the site are discussed in Section 6.0.

### 4.0 Remedial Action Plan

#### 4.1 Assessment Activities and Interim Actions

According to historical records, dry-cleaning operations were conducted on the source property, formerly located at 803 Glenwood Avenue, since at least 1956. Historical city directories identified South Elm Street Cleaners in 1956 and Lucas Cleaners in 1961. Details regarding the former dry-cleaning operations are not available. Based on historical aerial photographs, the former dry-cleaner building was demolished in 2013. The property has been redeveloped and is currently used for student housing and retail as part of the UNCG campus.

In August 2015, SITECH Consulting, PC (SITECH) collected soil and groundwater samples in locations west and southwest of the source property prior to UNCG redevelopment activities. PCE was identified in one temporary groundwater monitoring well located southwest and topographically downgradient of the former dry-cleaner. The historical dry-cleaner was identified as the most likely source of PCE-impacted groundwater. An additional groundwater assessment was completed by SITECH between April and June 2016 to confirm the historical dry-cleaner as the source of the PCE groundwater impacts. PCE was identified in one temporary monitoring well installed within the former dry-cleaner building footprint and multiple temporary monitoring wells downgradient of the former dry-cleaner. Based on the presence of PCE in groundwater at an elevated concentration within the former dry-cleaner building footprint, the PCE release was attributed to the historical dry-cleaning operations.

The owner of the property that historically contained the dry-cleaner (Capital Facilities Foundation, Inc.) petitioned for entry of the site into the DSCA Program, and the site was certified into the Program in July 2016. The DSCA Program subsequently performed assessment and



monitoring activities between 2016 and 2022. Impacted soil was not detected during assessment activities on the source property; therefore, a source soil area has not been identified. The extent of impacted groundwater is considered adequately delineated, and the groundwater impacts are limited to one western-adjacent off-source property. As indicated previously, the source property groundwater impacts have fully attenuated, but the portion of the contaminant plume that has migrated beyond the source property remains above 2L standards. A receptor survey was performed, which did not identify public water supply wells within a 0.5-mile radius of the site. Two private water supply wells were identified within 0.5 miles of the site. One well is located approximately 1,300 feet north (i.e., upgradient) of the source property and is used for washing vehicles. The other well is located approximately 1,900 feet northwest (i.e., upgradient) of the source property and is used for irrigation. Both wells are located on properties associated with UNCG and are upgradient of the source property. Based on their distance and location, the water supply wells are not considered at risk of impacts from the plume and sampling has not been deemed warranted.

The nearest surface water body is Mile Run Creek (North Carolina Surface Water Classification WS-V; NSW) located approximately 1,240 feet southwest and downgradient of the groundwater source area. Based on the distance to the creek and the groundwater contaminant plume extents, surface water sampling has not been deemed warranted.

Vapor intrusion assessment included the collection of soil gas samples on the source property and western-adjacent non-source property. Low concentrations of PCE and trichloroethylene (TCE) were detected in soil gas samples collected on the source property. Low concentrations of PCE were detected in soil gas samples collected on the western-adjacent non-source property. The calculated risks associated with the detected soil gas concentrations on the source and non-source properties indicated no exceedances of the DSCA Program's risk thresholds for residential or non-residential land-use.

Quarterly groundwater monitoring events were conducted between May 2019 and February 2020 to evaluate groundwater contaminant plume stability. The results of the sampling events confirmed that the groundwater contaminant plume associated with the dry-cleaning solvent release is stable.



H&H submitted a Risk Assessment Report for the site on June 19, 2023. As discussed in Section 3.0, the risk assessment concluded that risks associated with the contamination at the site could be managed through implementation of land-use controls as detailed in this RMP. Therefore, the risk assessment recommended risk-based closure for the site. The purpose of this RMP is to ensure that the assumptions made in the risk assessment remain valid in the future.

#### 4.2 Remedial Action

According to the DSCA Program's RBCA guidance, no remedial action is necessary if four site conditions are met. Each of these conditions and their applicability to the subject site are addressed below.

#### Condition 1: The dissolved plume is stable or decreasing.

Quarterly groundwater monitoring events were performed at the site from May 2019 to February 2020. PCE and bromodichloromethane were the only constituents detected above 2L Standards in groundwater associated with permanent groundwater monitoring wells at the site. Bromodichloromethane is a common laboratory contaminant and is not considered a constituent of concern (COC) for the dry-cleaning release. As such, the compound was not included in the plume stability evaluation. Based on evaluation of the data, the plume stability analysis for the dry-cleaning solvent release focused on PCE.

A plume stability evaluation was performed and documented in a Groundwater Monitoring Report, dated April 20, 2020. PCE attributed to the dry-cleaning solvent release at the site has been identified at concentrations above 2L Standards in monitoring well MW-3, located on the western-adjacent and downgradient off-source property. As part of the plume stability evaluation, H&H utilized the GSI Mann-Kendall Toolkit which indicated a "no trend" for PCE in MW-3. Guidance for the Mann-Kendall Toolkit indicates a "no trend" result can be considered as evidence that the plume concentrations are not increasing at the sampling point, similar to a "stable" result. Furthermore, PCE was not detected in MW-2S/D located approximately 140 feet south and downgradient of MW-3 during the groundwater plume stability monitoring events.



Based on the results of the evaluation, H&H concludes that the groundwater plume associated with the site is stable. The plume stability demonstration, including a table showing historical groundwater analytical data and GSI Mann-Kendall evaluations, is included in **Appendix A**. The monitoring well locations are shown on **Figures 2** through **5**.

# Condition 2: The maximum concentration within the exposure domain for every complete exposure pathway of any COC is less than ten times the EPC of that COC.

For the risk assessment, H&H used the maximum concentrations detected at the site as the exposure point concentration (EPC) for each constituent. Thus, this condition has been met for all COCs and exposure pathways.

# Condition 3: Adequate assurance is provided that the land-use assumptions used in the DSCA Program's RBCA process are not violated for current or future conditions.

As discussed in Section 6.0, land-use controls will be implemented on one off-source property to ensure that the assumptions made in the risk assessment remain valid in the future.

#### Condition 4: There are no ecological concerns at the site.

H&H completed a Level 1 Ecological Risk Assessment for the site in accordance with the DSCA Program's RBCA guidance. The results of the evaluation indicate that the release does not pose an unacceptable ecological risk. The completed Level 1 Ecological Risk Assessment Checklists A and B and associated attachments are included as **Appendix B**.

The site's compliance with the four above-referenced conditions confirms that the contaminant concentrations are not likely to pose an unacceptable risk either at present or in the future. Remaining contamination is expected to naturally attenuate over time. The appropriate remedial action is to implement land-use controls on one off-source property where contamination is present.



#### 5.0 Data Collected During RMP Implementation

No further sampling or other data collection activities are proposed for the site, as long as the assumptions detailed in the Notice of Dry-Cleaning Solvent Remediation (NDCSR) remain valid. As such, this section is not applicable.

## 6.0 Land-Use Controls

As discussed in Section 3.0, the recommendation for closure in the risk assessment for the site was based on the following land-use controls:

No activities that encounter, expose, remove, or use groundwater will occur without prior approval of NCDEQ in the area identified as "groundwater use control area" on Figure 5. This area encompasses the western-adjacent off-source property.

Institutional controls will be implemented to ensure that land-use conditions are maintained and monitored until the land-use controls are no longer required for the site. NDCSRs were prepared for the source property and one impacted off-source property to comply with the land-use control requirement. The NDCSR for the source property is included in **Appendix C**, and the NDCSR for the off-source property is included in **Appendix D**. Refer to the NDCSRs for the specific language to be incorporated to address each of the risk assessment assumptions. A survey plat showing the locations and types of dry-cleaning solvent impacts is included as an exhibit to the NDCSRs. The locations of dry-cleaning solvent impacts are where contaminants have been detected or are reasonably assumed to be present at concentrations above unrestricted use standards.

### 7.0 Long-Term Stewardship Plan

The NDCSR for the source property does not include any restrictions on the current or future use of the property. As such, the property owner (same as the owner of the source property) is not required to submit an annual certification of land use restrictions to comply with the requirements of the NDCSR.



#### 8.0 RMP Implementation Schedule

Since the groundwater plume is stable and possible exposure to the contamination is managed through the NDCSRs, no additional site remediation activities are required to implement the RMP. A 30-day public comment period will be held to allow the community an opportunity to comment on the proposed strategy. Following that 30-day period, the owner of the off-source property where dry-cleaning solvent contamination has been detected in groundwater will be notified that a notice will be placed in their chain of title indicating that state regulations prohibit the installation of a water supply well on their property, pursuant to N.C. Gen. Stat. 143-215.104I(b1) and N.C. Gen. Stat. 215.104M. The property owner will have 60 days to appeal this notice, pursuant to N.C. Gen. Stat. 143-215.104S. **Appendix E** includes example documents that will be used to announce the public comment period in the local newspaper and to inform local officials, nearby property owners, and interested parties. Upon completion of the 30-day public comment period, 60-day appeal period, and final approval of the RMP, the NDCSRs will be filed with the Guilford County Register of Deeds and will complete the RMP schedule.

#### 9.0 Criteria for Demonstrating RMP Success

The RMP will be successfully implemented once the required NDCSRs have been executed and recorded with the Guilford County Register of Deeds. The NDCSRs may, at the request of the owner of the property, be canceled by NCDEQ after the risk to public health and the environment associated with the dry-cleaning solvent contamination and any other contaminants included in the dry-cleaning solvent assessment and remediation agreement has been eliminated as a result of remediation of the property. If NCDEQ is notified of a change in site conditions, per the notification requirements detailed in the NDCSR, the RMP will be reviewed to determine if the site conditions have impacted the requirements set forth in the NDCSR and if changes are required. Enforcement of the RMP will be maintained through receipt of the "Annual Certification of Land-Use Restrictions" from the property owner as part of the NDCSR requirements.



#### **10.0 Contingency Plan if RMP Fails**

As discussed above, unless the DSCA Program is notified of a change in land-use conditions at the subject site, per the notification requirements detailed in this plan, the RMP will remain in effect until the RMP has met its objectives and is considered a success. Pursuant to N.C.G.S. 143-215.104K, if any of the LURs set out in the NDCSR are violated, the owner of the property at the time the LURs are violated, the owner's successors and assigns, and the owner's agents who directed or contracted for alteration of the site in violation of the LURs, shall be held liable for the remediation of all contaminants to unrestricted use standards.

#### **11.0 Conclusions and Recommendations**

H&H has prepared this RMP for the former Lucas Cleaners site on behalf of the DSCA Program. The results of the risk assessment completed for the site indicate that contaminant concentrations do not pose an unacceptable risk with appropriate land-use controls applied to the impacted properties. The groundwater contaminant plume associated with the site appears to be stable. This RMP specifies that the NDCSR requirements provide notification that land-use conditions observed during the risk assessment evaluation remain valid in the future. Based on the documentation contained in this report, H&H recommends issuance of a "No Further Action" letter.



Figures







#### LEGEND

- --- SOURCE PROPERTY BOUNDARY
- FORMER LUCAS CLEANERS
- PARCEL BOUNDARY

++++++++++++ RAILROAD

- MONITORING WELL
- NESTED MONITORING WELL PAIR

#### NOTES:

- 1. AERIAL IMAGERY OBTAINED FROM NC ONEMAP, 2022.
- 2. BASE DATA OBTAINED FROM GUILFORD COUNTY GIS, 2023.
- 3. DRY-CLEANER LOCATION BASED ON SANBORN MAP DATED 1956.



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SCALE IN FEET

#### LUCAS CLEANERS DSCA SITE ID: DC410049 1101 W. GATE CITY BLVD. (FORMERLY 803 GLENWOOD AVE.)

GREENSBORO, NORTH CAROLINA

hart hickman	2923 South Tryon Street-Suite 100 Charlotte, North Carolina 28203 704-586-0007(p) 704-586-0373(f) License # C-1269 / #C-245 Geology
ATE: 8-30-23	REVISION NO. 0

DATE: 8-30-23
JOB NO. DS0-111

FIGURE NO. 2

Sample ID	Sample Date TCE			ATE CITY BOULEVARD
*	mg/L	]	W. G	
	Permanent Monitoring Wells			
	08/27/19 <0.00050 <0.00050 08/27/19 <0.00050 <0.00050			-0 <sup>GP-19</sup>
MW-1	11/21/19 <0.00050 <0.00050			
	02/18/20 <0.00050 <0.00050		MW-1	7-4S-D MW-1 (S-3)
	05/15/19 < 0.00050 < 0.00050 08/27/19 < 0.00050 < 0.00050		$\mathbf{Q}$	TMW-2S/D-O-
MW-2S	11/21/19 <0.00050 <0.00050	MVV-3 (S-13)	GP-14	TMW-1S/D MW-1
	02/18/20 <0.00050 <0.00050		Ý a vô	3P-11
	05/15/19 < 0.00050 < 0.00050 08/27/19 < 0.00050 < 0.00050		GP-13* •	GP-17' GP-
MW-2D	<u>11/21/19</u> <0.00050 <0.00050			
	02/18/20 <0.00050 <0.00050		MW-2	
	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$		GP-12 <sup>Y</sup>	GP-16 L
MW-3	11/21/19 <b>0.0022</b> <0.00050			
	02/18/20 0.0022 <0.00050		JGP-10	Ĵ₽-15
	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$			
MW-4	<u>11/21/19</u> <0.00050 <0.00050 0.00050			
	02/18/20 <0.00050 <0.00050		GP-94 MW 2D MW-3	
	05/15/19 <0.00050 <0.00050			
MW-5	<u>11/21/19</u> <0.00050 <0.00050 0.00050		WW-2 (S-10)	
	02/19/20 <0.00050 <0.00050			
TMW 18	Temporary Monitoring Wells		MW-5 <sup>+</sup>	
TMW-13 TMW-1D	<b>08/09/16</b> <0.010 <0.010	MW-4		
TMW-2S	08/10/16 <0.0010 <0.0010	MW-4 (S-		
TMW-2D	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$		• \GP-6	V V
TMW-3D	08/10/16 <0.010 <0.010			
TMW-4S	08/11/16 <0.0010 <0.0010			
TMW-4D TMW-5S	08/11/16 <0.010 <0.010			
TMW-5D	08/12/16 <0.0010 <0.0010	S1	TMW-10S/D	
TMW-6S	08/11/16 0.0052 <0.0010	Š	°Ų <sup>+</sup> <sup>™</sup> ⊕ <sup>MW-2S/D</sup>	
TMW-6D TMW-7S	08/12/16 <0.0010 <0.0010 08/11/16 <0.0010 0.00067 I	IW.		<del>A</del>
TMW-7D	08/12/16 <0.0010 <0.0010	l do	TMW-95/D TMW-75/D	
TMW-8S	<b>08/12/16</b> <0.0010 <0.0010			
TMW-8D TMW-9S	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	N N N N N N N N N N N N N N N N N N N		
TMW-9D	08/12/16 0.00041 J <0.0010			
TMW-10S	<b>08/12/16</b> <0.0010 <0.0010			
IMW-10D NC 2L S	08/12/16 < 0.0010 < 0.0010			
			- L- L-	
	LEGEND	MV	-5 (S-24)	
	FORMER LUCAS CLEANERS		1. BASE DATA	OBTAINED FROM GUILFORD COUNTY GIS, 2023.
	PARCEL BOUNDARY		2. DRY-CLEAN	ER LOCATION BASED ON SANBORN MAP DATED 1956.
	MONITORING WELL		3. ONLY DETE	CTED DRY-CLEANING RELATED CONSTITUENTS ARE SHOWN. ADDITIONAL
	NESTED MONITORING WELL PAIR		DETECTED TABLE 8.	CONSTITUENT CONCENTRATIONS ARE SUMMARIZED IN ANALYTICAL DATA
	- TEMPORARY MONITORING WELL		4. BOLD VALU	IES INDICATE AN EXCEEDANCE OF NCAC 2L GROUNDWATER STANDARDS.
	🔶 🔶 SITECH GROUNDWATER SAMPLE		5. PCE = TETR	
	CURRENT PCE PLUME EXTENT			
	EXPOSURE UNIT #1		6. GROUNDWA BETWEEN 2	016 AND 2020.
	EXPOSURE UNIT #2		7. J FLAG INDI LABORATO	CATES ESTIMATED CONCENTRATION BETWEEN METHOD DETECTION LIMIT AND RY REPORTING LIMIT.
	GROUNDWATER POINT-OF-EXPOSUR	E	8. ALL GROUN	IDWATER SAMPLES COLLECTED BY SITECH CONSULTING. PC (SITECH) WERE
	GROUNDWATER SOURCE AREA		COLLECTED	) PRIOR TO PROPERTY REDEVELOPMENT IN 2017.







S:\AAA-Master ProjectsIDSCA - DS0IDS0-111 Lucas CleanersIReports/2023 RMIPIFiguresIDC410049\_20230606\_RA.dwg, FIG 5, 11/20/2023 7:47.28 AM, shay

Appendix A Plume Stability Demonstration



Table 8: A	Analytical	Data f	or Gro	undwa	ter															ADT 8
DSCA ID	No.: D	C41004	19																	
roundwater Sampling Point	ampling Date (mm/dd/yy)	Benzene	cis-1,2-Dichloroethylene	Ethylbenzene	Methyl tert-butyl ether (MTBE)	Naphthalene	Tetrachloroethylene	Toluene	trans-1,2-Dichloroethylene	Trichloroethylene	Vinyl chloride	Xylenes (total)	Acetone	Bromodichloromethane	1,2-Dichlorobenzene	Chloroform	1,2,4-Trichlorobenzene	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Isopropylbenzene (Cumene)
0	S							Perm	anent M	onitorin	g Wells									
	05/16/19	< 0.00050	< 0.00050	< 0.00050	0.00069	< 0.0010	< 0.00050	0.00027 J	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.00050	0.0012	< 0.00050	0.013	< 0.0010	< 0.00050	< 0.00050	< 0.00050
	08/27/19	< 0.00050	< 0.00050	< 0.00050	0.00057	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.00050	0.0012	< 0.00050	0.012	< 0.0010	< 0.00050	< 0.00050	< 0.0005(
MW-1	11/21/19	< 0.00050	< 0.00050	< 0.00050	0.00036 J	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	0.0011	< 0.00050	0.010	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	02/18/20	< 0.00050	< 0.00050	< 0.00050	0.00038 J	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	0.00094	< 0.00050	0.011	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	05/15/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	0.00033 J	< 0.00050	< 0.00050	< 0.00050	< 0.0015	0.0056	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	08/27/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
MW-28	11/21/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	02/18/20	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	05/15/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	0.00037 J	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
MW 2D	08/27/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
IVI VV -2D	11/21/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	02/18/20	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	05/15/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	0.0017	0.00027 J	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
MW-3	08/27/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	0.0024	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
11110 5	11/21/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	0.0022	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	0.0030 J	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	02/18/20	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	0.0022	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	05/15/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	0.00032 J	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
MW-4	08/27/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	0.00029 J	< 0.00050	< 0.00050	< 0.00050	< 0.0015	0.0042 J	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	11/21/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	02/18/20	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	05/15/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	0.0070	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
MW-5	08/27/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	0.0054	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	11/21/19	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0015	0.0032 J	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	< 0.00050	< 0.0005
	02/19/20	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	< 0.00050	0.00024 J	< 0.00050	< 0.00050	< 0.00050	< 0.0015	< 0.0050	< 0.00050	0.00058	0.0026	0.00074 J	< 0.00050	< 0.00050	< 0.00050
								Temp	orary M	lonitorin	g Wells									
TMW-1S	08/09/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010	0.0065	NA	NA	NA	NA	NA	NA	NA	NA
TMW-1D	08/09/16	0.86	< 0.010	0.18	NA	NA	< 0.010	0.0061 J	< 0.010	< 0.010	< 0.010	0.40	NA	NA	NA	NA	NA	NA	NA	NA
TMW-2S	08/10/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA

DSCA ID No.: DC410049

## ADT 8

oundwater Sampling Point	mpling Date (mm/dd/yy)	Benzene	cis-1,2-Dichloroethylene	Ethylbenzene	Methyl tert-butyl ether (MTBE)	Naphthalene	Tetrachloroethylene	Toluene	trans-1,2-Dichloroethylene	Trichloroethylene	Vinyl chloride	Xylenes (total)	Acetone	Bromodichloromethane	1,2-Dichlorobenzene	Chloroform	1,2,4-Trichlorobenzene	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Isopropylbenzene (Cumene)
5	Sa										[mg/L]					1				
TMW-2D	08/10/16	0.59	< 0.020	< 0.020	NA	NA	< 0.020	0.011 J	< 0.020	< 0.020	< 0.020	0.45	NA	NA	NA	NA	NA	NA	NA	NA
TMW-3S	08/10/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-3D	08/10/16	0.19	< 0.010	0.026	NA	NA	< 0.010	< 0.010	< 0.010	< 0.010	< 0.010	0.087	NA	NA	NA	NA	NA	NA	NA	NA
TMW-4S	08/11/16	0.026	< 0.0010	0.36	NA	NA	< 0.0010	0.16	< 0.0010	< 0.0010	< 0.0010	0.95	NA	NA	NA	NA	NA	NA	NA	NA
TMW-4D	08/11/16	0.58	< 0.010	0.82	NA	NA	< 0.010	1.1	< 0.010	< 0.010	< 0.010	2.66	NA	NA	NA	NA	NA	NA	NA	NA
TMW-5S	08/11/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-5D	08/12/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-6S	08/11/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	0.0052	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-6D	08/12/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-7S	08/11/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	< 0.0010	< 0.0010	< 0.0010	0.00067 J	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-7D	08/12/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-8S	08/12/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-8D	08/12/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	0.0014	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-9S	08/12/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	0.0034	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-9D	08/12/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	0.00041 J	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-10S	08/12/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
TMW-10D	08/12/16	< 0.0010	< 0.0010	< 0.0010	NA	NA	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0030	NA	NA	NA	NA	NA	NA	NA	NA
								SITE	CH Gro	undwate	er Data									
MW-1 (S3)*	08/07/15	7.36	< 0.000500	2.58	< 0.000500	0.282	< 0.000500	28.7	< 0.000500	< 0.000500	< 0.000500	12.44	< 0.00200	< 0.000500	NA	<0.000500	< 0.00100	1.15	0.278	0.0940
MW-2 (S10)*	08/07/15	< 0.000500	< 0.000500	< 0.000500	0.107	< 0.00200	0.00661	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00200	< 0.000500	NA	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
MW-3 (S13)*	08/08/15	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00200	< 0.000500	NA	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
MW-4 (S20)*	08/08/15	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	0.00657	< 0.000500	NA	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
MW-5 (S24)*	08/08/15	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00200	< 0.000500	NA	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
MW-1*	03/23/16	0.248	< 0.0250	1.48	< 0.0250	0.211	< 0.0250	0.449	< 0.0250	< 0.0250	< 0.0250	4.95	< 0.250	< 0.0250	NA	< 0.0250	< 0.050	2.17	0.579	0.161
MW-2*	03/23/16	< 0.000500	< 0.000500	< 0.000500	0.0114	< 0.00200	0.00622	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	NA	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
MW-3*	03/23/16	< 0.000500	< 0.000500	< 0.000500	0.00996	< 0.00200	0.00545	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	NA	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
MW-3D*	03/23/16	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	NA	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
MW-4*	03/23/16	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	NA	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
GP-5	04/12/16	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.000500	< 0.000500	<0.000500
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DSCA ID	SCA ID No.: DC410049																			
DOCTID	110. D				r			1	0											
Groundwater Sampling Point	Sampling Date (mm/dd/yy)	Benzene	cis-1,2-Dichloroethylene	Ethylbenzene	Methyl tert-butyl ether (MTBE)	Naphthalene	Tetrachloroethylene	Toluene	trans-1,2-Dichloroethylene	Trichloroethylene	[] Vinyl chloride	Xylenes (total)	Acetone	Bromodichloromethane	1,2-Dichlorobenzene	Chloroform	1,2,4-Trichlorobenzene	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Isopropylbenzene (Cumene)
	04/12/16	< 0.000500	< 0.000500	< 0.000500	0.0115	< 0.00200	0.0924	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
GP-6	06/07/16	< 0.00500	< 0.00500	< 0.00500	0.0103	< 0.00500	0.0493	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.0500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500
GP-7	04/12/16	< 0.000500	< 0.000500	< 0.000500	< 0.00100	0.000580	0.00450	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
GP-8	04/12/16	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	< 0.000500	0.00209	< 0.00100	< 0.000500	< 0.000500	< 0.000500
GP-9	04/12/16	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
GP-10	04/12/16	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
GP-11	04/12/16	0.0678	< 0.00500	0.619	0.0104	0.0761	0.00480	2.59	< 0.00500	< 0.00500	< 0.00500	2.78	0.0850	< 0.00500	< 0.00500	< 0.00500	< 0.0100	0.265	0.0590	0.0225
GP-12	04/12/16	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
GP-13	04/12/16	< 0.000500	< 0.000500	0.000140	< 0.00100	0.000220	< 0.000500	0.000660	< 0.000500	< 0.000500	< 0.000500	0.000500	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	0.000110	< 0.000500	< 0.000500
GP-14	04/12/16	< 0.000500	< 0.000500	< 0.000500	0.00274	< 0.00200	< 0.000500	0.000520	< 0.000500	< 0.000500	< 0.000500	0.000380	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
GP-15	04/12/16	< 0.000500	< 0.000500	< 0.000500	< 0.00100	0.000130	< 0.000500	0.000460	< 0.000500	< 0.000500	< 0.000500	0.000390	< 0.00500	< 0.000500	< 0.000500	0.000520	< 0.00100	< 0.000500	< 0.000500	< 0.000500
GP-16	05/19/16	0.0149	< 0.00500	0.00380	0.0727	0.0259	< 0.00500	0.00230	< 0.00500	< 0.00500	< 0.00500	0.128	< 0.0500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	0.00825	0.0385	0.0101
CD 17	05/19/16	< 0.00500	< 0.00500	< 0.00500	0.00705	< 0.00500	0.0356	0.00100	< 0.00500	< 0.00500	< 0.00500	0.00250	< 0.0500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	0.00112	< 0.00500
GP-17	06/07/16	0.00540	< 0.00500	0.0368	0.0745	0.0654	< 0.00500	0.0100	< 0.00500	< 0.00500	< 0.00500	0.781	< 0.0500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	0.0733	< 0.00500	0.0353
GP-18	05/19/16	< 0.00500	< 0.00500	< 0.00500	< 0.0100	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.0500	0.00104	< 0.00500	0.0108	< 0.00500	< 0.00500	< 0.00500	< 0.00500
GP-19	05/19/16	< 0.00500	< 0.00500	< 0.00500	< 0.0100	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.0500	< 0.00500	< 0.00500	0.00217	< 0.00500	< 0.00500	< 0.00500	< 0.00500
GP-20	05/19/16	< 0.00500	< 0.00500	< 0.00500	< 0.0100	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.0500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500
GP-21	05/19/16	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
GP-22	05/19/16	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
GP-23	05/19/16	< 0.000500	< 0.000500	< 0.000500	0.00523	< 0.00200	< 0.000500	0.000680	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00100	< 0.000500	< 0.000500	< 0.000500
NC 2L S	Standard	0.001	0.07	0.6	0.02	0.006	0.0007	0.6	0.1	0.003	0.00003	0.5	6	0.0006	0.02	0.07	0.07	0.4	0.4	0.07

Notes:

1. Bold indicates value exceeds the Title 15A NCAC 2L .0202 Groundwater Standard (2L Standard) or Interim Maximum Allowable Concentration (IMAC) dated April 2013.

2. Only volatile organic compounds detected in at least one sample are shown. SITECH Consulting PC (SITECH) samples collected in August 2015, March 2016, and April 2016 were analyzed by Standard Method 6200B. All other samples analyzed by EPA Method 8260. SITECH analyzed samples for additional constituents.

3. NA denotes not analyzed.

**Table 8: Analytical Data for Groundwater** 

3. J flag denotes estimated concentration between the laboratory reporting limit and method detection limit.

\* SITECH Well ID indicates well location separate from that of permanent monitoring wells of similar names.

ADT 8

																AD	OT 8(1)
roundwater Sampling Point	umpling Date (mm/dd/yy)	n-Propylbenzene	p-Cymene (4-Isopropyltoluene)	n-Butylbenzene	sec-Butylbenzene	1,1,1-Trichloroethane	1,1-Dichloroethane	Isopropyl Ether	1,2,3-Trichloropropane	2-Hexanone	Cyclohexane	Methylcyclohexane	1,2-Dibromomethane (EDB)				
ð	Š							Doum	an an 4 M		[mg/L]						
	05/16/19	<0.00050	NΔ	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	NA	NA NA	NΔ	<0.00050				
	08/27/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
MW-1	11/21/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
	02/18/20	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
	05/15/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
	08/27/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
MW-28	11/21/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
	02/18/20	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
MW 2D	05/15/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
MW 2D	08/27/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
IVI VV -2D	11/21/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
	02/18/20	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
	05/15/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
MW-3	08/27/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
11111 5	11/21/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
	02/18/20	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
	05/15/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050			'	
MW-4	08/27/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
	11/21/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
	02/18/20	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050			'	
	05/15/19	< 0.00050	NA	< 0.0010	< 0.00050	< 0.00050	< 0.00050	< 0.00050	< 0.0010	NA	NA	NA	< 0.00050				
MW-5	08/27/19	<0.00050	NA	< 0.0010	<0.00050	<0.00050	<0.00050	<0.00050	< 0.0010	NA	NA	NA	<0.00050				
	02/10/20	<0.00050	NA	< 0.0010	<0.00050	<0.00050	<0.00050	<0.00050	< 0.0010	NA	NA	NA	<0.00050			'	
	02/19/20	<0.00050	INA	<0.0010	<0.00030	<0.00030	<0.00030	~0.00030	v.0010	onitoring	Wells	INA	~0.00030				
TMW-1S	08/09/16	NΔ	NΔ	NΔ	NΔ	NΔ	NΔ	NA	NA	NA	NA	NΔ	NΔ				
TMW-1D	08/09/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA				
TMW-2S	08/10/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA				
111111 20	00/10/10	1 12 1	1 11 1	1 12 1	1 12 1	1111	1 11 1	1 12 1	1 12 1	1 11 1	1 11 1	1 12 1	1 11 1				

																	AD	1 8(1)
oundwater Sampling Point	mpling Date (mm/dd/yy)	n-Propylbenzene	p-Cymene (4-Isopropyltoluene)	n-Butylbenzene	sec-Butylbenzene	1,1,1-Trichloroethane	1,1-Dichloroethane	Isopropyl Ether	1,2,3-Trichloropropane	2-Hexanone	Cyclohexane	Methylcyclohexane	1,2-Dibromomethane (EDB)					
Ğ	Sai					I					[mg/L]							
TMW-2D	08/10/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-3S	08/10/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-3D	08/10/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-4S	08/11/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-4D	08/11/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-5S	08/11/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-5D	08/12/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-6S	08/11/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-6D	08/12/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			 		
TMW-7S	08/11/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-7D	08/12/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-8S	08/12/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-8D	08/12/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-9S	08/12/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-9D	08/12/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-10S	08/12/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
TMW-10D	08/12/16	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
		•	•	•				SITE	CH Gro	undwate	r Data	1	•		•	•		
MW-1 (S3)*	08/07/15	0.199	0.00587	< 0.00200	0.0106	< 0.000500	< 0.000500	NA	< 0.00100	0.935	NA	NA	0.232					
MW-2 (S10)*	08/07/15	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	NA	< 0.00100	< 0.000400	NA	NA	< 0.00100					
MW-3 (S13)*	08/08/15	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	NA	< 0.00100	< 0.000400	NA	NA	< 0.00100					
MW-4 (S20)*	08/08/15	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	NA	< 0.00100	< 0.000400	NA	NA	< 0.00100					
MW-5 (S24)*	08/08/15	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	NA	< 0.00100	< 0.000400	NA	NA	< 0.00100					
MW-1*	03/23/16	0.436	0.0175 J	0.0645 J	0.0275	< 0.0250	< 0.0250	NA	< 0.0500	< 0.250	NA	NA	< 0.0500					
MW-2*	03/23/16	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	NA	< 0.00100	< 0.00500	NA	NA	< 0.00100					
MW-3*	03/23/16	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	NA	< 0.00100	< 0.00500	NA	NA	< 0.00100					
MW-3D*	03/23/16	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	NA	< 0.00100	< 0.00500	NA	NA	< 0.00100					
MW-4*	03/23/16	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	NA	< 0.00100	< 0.00500	NA	NA	< 0.00100					
GP-5	04/12/16	< 0.00100	< 0.000500	< 0.00200	< 0.000500	0.00400	0.00242	< 0.00500	< 0.00100	< 0.00500	NA	NA	< 0.00100					

																	AD	OT 8(1)
oundwater Sampling Point	mpling Date (mm/dd/yy)	n-Propylbenzene	p-Cymene (4-Isopropyltoluene)	n-Butylbenzene	sec-Butylbenzene	1,1,1-Trichloroethane	1,1-Dichloroethane	Isopropyl Ether	1,2,3-Trichloropropane	2-Hexanone	Cyclohexane	Methylcyclohexane	1,2-Dibromomethane (EDB)					
G	Sa										[mg/L]				r			
GP-6	04/12/16	<0.00100	<0.000500	<0.00200	<0.000500	<0.000500	<0.000500	0.00134	<0.00100	<0.00500	NA	NA	<0.00100					
CP 7	00/07/10	< 0.00500	<0.00500	<0.00200	<0.00500	<0.00500	<0.00500	NA <0.00500	<0.00500	<0.0500	<0.00500	<0.00500	<0.00500					
GP-8	04/12/16	<0.00100	<0.000500	<0.00200	<0.000500	<0.000500	<0.000500	<0.00500	<0.00100	<0.00500	NΔ	NΔ	<0.00100					
GP-9	04/12/16	<0.00100	<0.000500	<0.00200	< 0.000500	< 0.000500	< 0.000500	<0.00500	<0.00100	<0.00500	NA	NA	<0.00100					
GP-10	04/12/16	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.00500	< 0.00100	< 0.00500	NA	NA	< 0.00100					
GP-11	04/12/16	0.0484	< 0.00500	0.00590	< 0.00500	< 0.00500	< 0.00500	< 0.0500	0.00390	0.141	NA	NA	< 0.0100					
GP-12	04/12/16	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.00500	< 0.00100	< 0.00500	NA	NA	< 0.00100					
GP-13	04/12/16	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.00500	< 0.00100	< 0.00500	NA	NA	< 0.00100					
GP-14	04/12/16	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.00500	< 0.00100	< 0.00500	NA	NA	< 0.00100					
GP-15	04/12/16	< 0.00100	< 0.000500	< 0.00200	< 0.000500	< 0.000500	< 0.000500	< 0.00500	< 0.00100	< 0.00500	NA	NA	< 0.00100					
GP-16	05/19/16	0.00641	< 0.00500	0.00111	< 0.00500	< 0.00500	< 0.00500	NA	< 0.00500	< 0.0500	0.0143	0.0112	< 0.00500					
CD 17	05/19/16	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	NA	< 0.00500	< 0.0500	< 0.00500	< 0.00500	< 0.00500					
Gr-17	06/07/16	0.0165	0.00817	0.00436	< 0.00500	< 0.00500	< 0.00500	NA	< 0.00500	< 0.0500	0.0548	0.0489	< 0.00500					
GP-18	05/19/16	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	NA	< 0.00500	< 0.0500	< 0.00500	< 0.00500	< 0.00500					
GP-19	05/19/16	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	NA	< 0.00500	< 0.0500	< 0.00500	< 0.00500	< 0.00500					
GP-20	05/19/16	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500	NA	< 0.00500	< 0.0500	< 0.00500	< 0.00500	< 0.00500					
GP-21	05/19/16	< 0.00100	< 0.000500	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00500	< 0.00100	< 0.00500	NA	NA	< 0.00100					
GP-22	05/19/16	< 0.00100	< 0.000500	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00500	< 0.00100	< 0.00500	NA	NA	< 0.00100					
GP-23	05/19/16	< 0.00100	< 0.000500	< 0.00500	< 0.000500	< 0.000500	< 0.000500	< 0.00500	< 0.00100	< 0.00500	NA	NA	< 0.00100					
NC 2L S	Standard	0.07	0.025*	0.07	0.07	0.2	0.006	0.07	0.000005	0.04*	NE	NE	0.00002					

Notes:

1. Bold indicates value exceeds the Title 15A NCAC 2L .0202 Groundwater Standard (2L Standard) or Interim Maximum Allowable Concentration (IMAC) dated April 2013.

2. Only volatile organic compounds detected in at least one sample are shown. SITECH Consulting PC (SITECH) samples collected in August 2015, March 2016, and April 2016 were analyzed by Standard Method 6200B. All other samples analyzed by EPA Method 8260. SITECH analyzed samples for additional constituents.

3. NA denotes not analyzed.

3. J flag denotes estimated concentration between the laboratory reporting limit and method detection limit.

\* SITECH Well ID indicates well location separate from that of permanent monitoring wells of similar names.



raluation Date: 20-Apr-20 Facility Name: Lucas Cleaners Conducted By: Hart & Hickman					Job Constitu Concentration Ur			
Samp	ling Point ID:	MW-3						
Sampling	Sampling			P	CE CONCENTRATI	ON (ma/L)		
Event	Date	0.0017				(3/		
2	27-Aug-19	0.0017						
3	21-Nov-19	0.0022		-				
4	18-Feb-20	0.0022						
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15								
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20								
Coefficien	t of Variation:	0.14						
Mann-Kendall Statistic (S):		1						
Confidence Factor:		50.0%						
Concent	tration Trend:	No Trend						
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	0.001	05/10	07/10	08/10	10/10 12	/10 01/20	03/20	
	03/19	05/19	07/19	00/19	10/17 12/	01/20	03/20	

2. Confidence in Trend = Confidence (in percent) that constituent concentration is increasing (S>0) or decreasing (S<0): >95% = Increasing or Decreasing;

≥ 90% = Probably Increasing or Probably Decreasing; < 90% and S>0 = No Trend; < 90%, S≤0, and COV ≥ 1 = No Trend; < 90% and COV < 1 = Stable. 3. Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, Ground Water, 41(3):355-367, 2003.

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Appendix B

Level 1 Ecological Risk Assessment Checklists



Ecological Risk Assessment – Level 1 Checklist A – Potential Receptors and Habitat

Site / Location: Lucas Cleaners, 803 Glenwood Avenue, Greensboro, Guilford County, North Carolina H&H Project No.: DS0-111 DSCA Site ID: DC410049

1. Are there navigable water bodies or tributaries to a navigable water body on or within a one-half mile radius of the site?

**Yes**, Mile Run Creek is located approximately 1,240 feet southwest of the groundwater source area associated with former dry-cleaning facility. Mile Run Creek discharges into South Buffalo Creek, which ultimately feeds into the Haw River.

2. Are there any water bodies anywhere on or within one-half mile of the site?

**Yes**, Mile Run Creek is located approximately 1,240 feet southwest of the groundwater source area associated with former dry-cleaning facility.

3. Are there any wetland<sup>1</sup> areas such as marshes or swamps on or within one-half mile of the site?

**No**, there are no wetland areas identified within one-half mile of the site on the US Fish and Wildlife Services (USFWS) National Wetlands Inventory.

4. Are there any sensitive environmental areas<sup>2</sup> on or within one-half mile of the site?

**Possible,** habitat potentially occupied by federal and/or state endangered or threatened species is located within one-half mile of the site. Possible habitats include roadsides and right-of-way areas as well as Mile Run Creek which is located approximately 1,240 feet southwest of the groundwater source area associated with former dry-cleaning facility.

5. Are there any areas on or within one-half mile of the site owned or used by local tribes?

**No**, the Bureau of Indian Affair's Tribal Leaders Directory and the US Department of the Interior Bureau of Land Management's on-line National Data mapper do not identify any areas within a one-half mile radius of the source property owned or used by local tribes.

6. Are there any habitat, foraging area, or refuge by rare, threatened, endangered, candidate and/or proposed species (plants and animals), or any otherwise protected species on or within one-half mile of the site?

Likely, the US Fish and Wildlife Service lists three endangered species and two threatened species, as well as one proposed endangered species, one candidate species, and one species under review, in Guildford County. The NC Natural Heritage Program lists five state-listed endangered species and

<sup>&</sup>lt;sup>1</sup> Wetlands are defined in 40 CFR 232.2 as "areas inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances does support, a prevalence of vegetation typically adapted for life in saturated soil conditions." The sources to make the determination whether or not wetland areas are present may include, but not limited to, national wetland inventory available at <u>http://nwi.fws.gov</u>, federal or state agency, and USGS topographic maps.

 $<sup>^2</sup>$  Areas that provide unique and often protected habitat for wildlife species. These areas typically used during critical life stages such as breeding, hatching, rearing or young and overwintering. Refer to Attachment 1 for examples of sensitive environments.

five state-listed threatened species along with eight species of special concern and 12 significantly rare species within Guilford County. The US Fish and Wildlife Service Critical Habitat Mapper did not identify critical habitat on or within one-half mile of the source property. The species identified by the US Fish and Wildlife Service and the NC Natural Heritage Program include freshwater vertebrates and invertebrates that can potentially be found in and around Mile Run Creek, and flowering plants that can be found along roadsides and in right-of-ways, both of which are present within one-half mile of the source property.

7. Are there any breeding, roosting, or feeding areas used by migratory species on or within one-half mile of the site?

**Likely**, typical breeding, roosting, and feeding areas of migratory bird species may be present within one-half mile of the source property. The US Fish and Wildlife Service's Information for Planning and Consultation (IPaC) lists 10 migratory bird species that may be present within the vicinity of the source property during breeding season.

8. Are there any ecologically<sup>3</sup>, recreationally, or commercially important species on or within one-half mile of the site?

**Possible**, the recreational and commercial trapping of nuisance species is possible in Guilford County and several species, such as the beaver (*Castor canadensis*), are commonly found in North Carolina waterways; however, no information is available on the presence of such species within the vicinity of the source property.

9. Are there any threatened and/or endangered species (plant or animal) on or within one-half mile of the site?

**Possible**, the US Fish and Wildlife Service indicates the presence of the Schweinitz's sunflower (*Helianthus schweinitzii*)), green fiveleaf orchid / small whorled pogonia (*Isotria medeoloides*), Atlantic pigtoe (*Fusconaia masoni*), Roanoke logperch (*Percina rex*), and Cape Fear shiner (*Notropis mekistoocholas*) as threatened and/or endangered species within Guilford County.

If the answer is "Yes" to any of the above questions, then complete Level 1 Ecological Risk Assessment, Checklist B for Potential Exposure Pathways.

<sup>&</sup>lt;sup>3</sup> Ecologically important species include populations of species which provide a critical food resource for higher organisms. Ecologically important species include pest and opportunistic species that populate an area if they serve as a food source for other species, but do not include domesticated animals or plants/animals whose existence is maintained by continuous human interventions.

### Level 1 Ecological Risk Assessment Checklist B for Potential Exposure Pathways DSCA ID #DC410049

1A. Can chemicals associated with the site leach, dissolve, or otherwise migrate to groundwater?

Yes. Tetrachloroethylene (PCE) has been detected in groundwater at the site.

1B. Are chemicals associated with the site mobile in groundwater?

**Yes.** Chemical mobility is primarily influenced by the chemical solubility and soil-water partition coefficient. Based on these values, PCE is classified as moderately mobile (Fetter, 1988).

1C. Does groundwater from the site discharge to ecological receptor habitat?

**No.** Based on groundwater elevation measurements and areas of contaminant transport, groundwater at the site flows southwest. The primary downgradient ecological receptor habitat is Mile Run Creek, which is located approximately 1,240 feet southwest of the groundwater source area associated with former dry cleaning facility. The groundwater plume attributable to the former Lucas Cleaners release extends approximately 100 feet southwest of the groundwater source area and does not intersect with Mile Run Creek.

# Question 1. Could chemicals associated with the site reach ecological receptors through groundwater?

**No.** As discussed above, groundwater at the site flows southwest toward Mile Run Creek. The PCE plume has been adequately delineated, is stable, and does not intersect or come within close proximity of Mile Run Creek.

2A. Are chemicals present in surface soils on the site?

**No.** PCE has not been detected in surface soil at concentrations above the relevant Preliminary Soil Remediation Goals (PSRGs).

2B. Can chemicals be leached from or be transported by erosion of surface soils on the site?

No. Impacted soils are not present at the site.

# Question 2. Could chemicals associated with the site reach ecological receptors through runoff or erosion?

No. PCE has not been detected in surface soil samples.

3A. Are chemicals present in surface soil or on the surface of the ground?

**No.** PCE has not been detected in surface soil at concentrations above the relevant Preliminary Soil Remediation Goals (PSRGs).

3B. Are potential ecological receptors on the site?

**Possible.** There are areas of soil not covered by a paved asphalt parking lot or building slab; therefore, ecological receptors may be present.

# Question 3. Could chemicals associated with the site reach ecological receptors through direct contact?

No. PCE has not been detected in surface soil samples.

4A. Are chemicals on the site volatile?

**Yes.** PCE is a volatile compound.

4B. Could chemicals on the site be transported in air as dust or particulate matter?

No. Impacted soils have not been detected at the Site.

Question 4. Could chemicals associated with the site reach ecological receptors through inhalation of volatilized chemicals or adhere chemicals to dust in ambient air or in subsurface burrows?

- No. PCE has not been detected in soil samples.
- 5A. Is Non-Aqueous Phase Liquids (NAPL) present at the site?

No. NAPL has not been encountered at the site.

5B. Is NAPL migrating?

No. NAPL has not been encountered at the site.

5C. Could NAPL discharge occur where ecological receptors are found?

No. NAPL has not been encountered at the site.

# Question 5. Could chemicals associated with the site reach ecological receptors through migration of NAPL?

- No. NAPL has not been encountered at the site.
- 6A. Are chemicals present in surface and shallow subsurface soils or on the surface of the ground?

No. Impacted soils have not been detected at the Site.

6B. Are chemicals found in soil on the site taken up by plants growing on the site?

No. Impacted soils have not been detected at the Site.

6C. Do potential ecological receptors on or near the site feed on plants (e.g., grasses, shrubs, forbs, trees, etc.) found on the site?

**Unlikely.** The site is primarily impervious with small areas of landscaped or grassy land that potential ecological receptors could feed on; however, the site is located in an urban setting with little habitat for potential ecological receptors.

6D. Do chemicals found on the site bioaccumulate?

**No.** Based on published references (U.S. Agency for Toxic Substances and Disease Registry, 1997), PCE does not significantly bioaccumulate.

# Question 6. Could chemicals associated with the site reach ecological receptors through direct ingestion of soil, plants, animals, or contaminants?

**No.** Impacted soils have not been detected at the site and the groundwater plume does not intersect surface water and the constituents of concern do not bioaccumulate. As such, it is unlikely that direct ingestion of plants or animals would occur.

## Attachment 1 Examples of Sensitive Environments DSCA ID #DC410049

Examples of environmentally sensitive areas include, but are not limited to, the following:

- National parks and national monuments, *None near site*
- Designated or administratively proposed federal wilderness areas, *None near site*
- National preserved, *None near site*
- National or state wildlife refuges, *None near site*
- National lakeshore recreational areas, *None near site*
- Federal land designated for protection of natural ecosystems, *None near site*
- State land designated for wildlife or game management, *None near site*
- State designated natural areas, *None near site*
- Federal or state designated scenic or wild river, *None near site*
- All areas that provide or could potentially provide critical habitat for state and federally listed threatened or endangered species, those species that are currently petitioned for listing, and species designated by other agencies as sensitive or species of concern,

Possible habitat in and around Mile Run Creek located approximately 1,034 ft southwest of the source property, and along roadsides and right-of-way areas located within one-half mile of the source property

- Marine sanctuary, *None near site*
- Areas identified under the coastal zone management act, *None near site*
- Sensitive areas identified under the national estuary program or near coastal waters program, *None near site*
- Critical areas identified under the clean lakes program, None near site
- National seashore recreational area, *None near site*
- Habitat known to be used by federal designated or proposed endangered or threatened species, *Possible habitat in and around Mile Run Creek located approximately 1,034 ft southwest of the source property, and along roadsides and right-of-way areas located within one-half mile of the source property*
- Unit of coastal barrier resources system, *None near site*
- Coastal barrier (undeveloped), *None near site*
- Spawning areas critical for the maintenance of fish/shellfish species within river, lake, or coastal tidal waters, *None near site*
- Migratory pathways and feeding areas critical for maintenance of andromous fish species within river reaches or areas in lakes or coastal tidal waters in which the fish spend extended periods of time, *Possible migratory pathway and feeding area at Mile Run Creek located approximately 1,034 ft southwest of the source property*
- Terrestrial areas utilized for breeding by large of dense aggregations of animals, *None near site*
- National river reach designated as recreational, *None near site*
- Habitat known to be used by state designated endangered or threatened species, *Possible habitat in and around Mile Run Creek located approximately 1,034 ft southwest of the source property, and along roadsides and right-of-way areas located within one-half mile of the source property*
- Habitat known to be used by species under review as to its federal endangered or threatened state, *Possible habitat in mature trees, artificial structures, and railway overpasses located within one-half mile of the source property, and around Mile Run Creek located approximately 1,034 ft southwest of the source property*
- Coastal barrier (partially developed), None near site
- Particular areas, relatively small in size, important to maintenance of unique biotic communities, *None near site*
- State designated areas for protection or maintenance of aquatic life, and *None near site*
- Wetlands. *None near site*



## U.S. Fish and Wildlife Service National Wetlands Inventory

## Lucas Cleaners (DC410049)



#### May 11, 2020

#### Wetlands

- Estuarine and Marine Wetland

Estuarine and Marine Deepwater

Freshwater Pond

Freshwater Emergent Wetland

Freshwater Forested/Shrub Wetland

Lake Other Riverine This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



### NCNHDE-22841: Lucas Cleaners

### **Critical Habitat for Threatened & Endangered Species [USFWS]**



A specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection.

0.2mi

State of North Carolina DOT, Esri, HERE, Garmin, INCREMENT P, USGS, METI/NASA, EPA, USDA

# IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

## Location

Guilford County, North Carolina



# Local office

Raleigh Ecological Services Field Office

**└** (919) 856-4520 **i** (919) 856-4556

MAILING ADDRESS

Post Office Roy 22726 https://ipac.ecosphere.fws.gov/location/RXQWLYKZPJFI7NYDM3KCWWIIOM/resources#migratory-birds Raleigh, NC 27636-3726

PHYSICAL ADDRESS 551 Pylon Drive, Suite F Raleigh, NC 27606-1487

NOTFORCONSULTATIO

# Endangered species

# This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

- 1. Draw the project location and click CONTINUE.
- 2. Click DEFINE PROJECT.
- 3. Log in (if directed to do so).
- 4. Provide a name and description for your project.
- 5. Click REQUEST SPECIES LIST.

Listed species<sup>1</sup> and their critical habitats are managed by the <u>Ecological Services Program</u> of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries<sup>2</sup>).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact <u>NOAA Fisheries</u> for <u>species under their jurisdiction</u>.

 Species listed under the <u>Endangered Species Act</u> are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the <u>listing status page</u> for more information. IPaC only shows species that are regulated by USFWS (see FAQ). 2. <u>NOAA Fisheries</u>, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

## Mammals

NAME	STATUS
Tricolored Bat Perimyotis subflavus Wherever found No critical habitat has been designated for this species. <u>https://ecos.fws.gov/ecp/species/10515</u>	Proposed Endangered
Insects NAME	STATUS
Monarch Butterfly Danaus plexippus Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9743	Candidate
Schweinitz's Sunflower Helianthus schweinitzii Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/3849	Endangered
Small Whorled Pogonia Isotria medeoloides No critical habitat has been designated for this species. <u>https://ecos.fws.gov/ecp/species/1890</u>	Threatened

## **Critical habitats**

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

# Bald & Golden Eagles

Bald and golden eagles are protected under the <u>Bald and Golden Eagle Protection Act</u> and the <u>Migratory Bird Treaty Act</u>.

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate conservation measures, as described <u>below</u>.

Additional information can be found using the following links:

- Eagle Managment <u>https://www.fws.gov/program/eagle-management</u>
- Measures for avoiding and minimizing impacts to birds <u>https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds</u>
- Nationwide conservation measures for birds <u>https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf</u>

### There are bald and/or golden eagles in your project area.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON

Bald Eagle Haliaeetus leucocephalus

Breeds Sep 1 to Jul 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

## **Probability of Presence Summary**

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

#### Probability of Presence (

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

- 1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
- 2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
- 3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

### Breeding Season (

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

#### Survey Effort ()

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

#### No Data (--)

A week is marked as having no data if there were no survey events for that week.

#### **Survey Timeframe**

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

			🔳 pr	obabilit	y of pre	sence	breec	ling seas	son Is	urvey ef	fort –	no data
SPECIES	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Bald Eagle Non-BCC Vulnerable	<b>\$</b> +++	┼┿╪╪	<b>₩</b> ₽++	┼┿┼┼	++++	┼┼║┼	++++	++++	┼┼┼ф	∎+++	++#+	+∎++

# What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the <u>Avian Knowledge Network (AKN)</u>. The AKN data is based on a growing collection of <u>survey</u>, <u>banding</u>, <u>and citizen science datasets</u> and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (<u>Eagle Act</u> requirements may apply). To see a list of all birds potentially present in your project area, please visit the <u>Rapid Avian Information Locator (RAIL) Tool</u>.

# What does IPaC use to generate the probability of presence graphs of bald and golden eagles in my specified location?

The Migratory Bird Resource List is comprised of USFWS <u>Birds of Conservation Concern (BCC)</u> and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the <u>Avian Knowledge</u> <u>Network (AKN)</u>. The AKN data is based on a growing collection of <u>survey</u>, <u>banding</u>, <u>and citizen science</u> <u>datasets</u> and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (<u>Eagle Act</u> requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the <u>Rapid Avian Information Locator (RAIL) Tool</u>.

#### What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the <u>Eagle Act</u> should such impacts occur. Please contact your local Fish and Wildlife Service Field Office if you have questions.

# Migratory birds

Certain birds are protected under the Migratory Bird Treaty  $Act^{1}$  and the Bald and Golden Eagle Protection  $Act^{2}$ .

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described <u>below</u>.

- 1. The Migratory Birds Treaty Act of 1918.
- 2. The <u>Bald and Golden Eagle Protection Act</u> of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern https://www.fws.gov/program/migratory-birds/species
- Measures for avoiding and minimizing impacts to birds <u>https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds</u>
- Nationwide conservation measures for birds <u>https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf</u>

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the <u>E-bird data mapping tool</u> (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

 

 NAME
 BREEDING SEASON

 Bald Eagle Haliaeetus leucocephalus
 Breeds Sep 1 to Jul 31

 This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.
 Breeds Sep 1 to Jul 31

Black-billed Cuckoo Coccyzus erythropthalmus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <u>https://ecos.fws.gov/ecp/species/9399</u>	Breeds May 15 to Oct 10
<b>Cerulean Warbler</b> Dendroica cerulea This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <u>https://ecos.fws.gov/ecp/species/2974</u>	Breeds Apr 28 to Jul 20
<b>Chimney Swift</b> Chaetura pelagica This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 25
Kentucky Warbler Oporornis formosus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 20 to Aug 20
<b>Prairie Warbler</b> Dendroica discolor This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
<b>Prothonotary Warbler</b> Protonotaria citrea This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 1 to Jul 31
Red-headed Woodpecker Melanerpes erythrocephalus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
Rusty Blackbird Euphagus carolinus This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere
Wood Thrush Hylocichla mustelina This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31

## Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

- 1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
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- 3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

### Breeding Season (=)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

### Survey Effort ()

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

#### No Data (–)

A week is marked as having no data if there were no survey events for that week.

### Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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SPECIES	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Bald Eagle Non-BCC Vulnerable	<b>#</b> +++	┼┿┿┿	<b>##</b> ++	┼┿┼┼	++++	++#+	++++	++++	+++	\$ \$ <del>1</del> \$	+++++	1111
Black-billed Cuckoo BCC Rangewide (CON)	++++	++++	++++	++++	┿ <mark>╋</mark> ╫╫	++++	++++	++++	$\leq$		++++	<del>++++</del>
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Prairie Warbler BCC Rangewide (CON)	++++	++++	++++	+###	┼╪┼┼	++++	++++	+++∭	<b>₩</b> ∔∔	∎ ++++	++++	++++
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Rusty Blackbird BCC - BCR	++++	++++	┼╪║┼	<b>#</b> +++	++++	++++	++++	++++	+++	+ ++++	+++#	++++
Wood Thrush BCC Rangewide (CON)	++++	++++	++++	┼║║║		1++1	┼╨╢┼	**1*	***	∎ ∎♥┼┼	++++	++++

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

<u>Nationwide Conservation Measures</u> describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. <u>Additional measures</u> or <u>permits</u> may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

# What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS <u>Birds of Conservation Concern (BCC)</u> and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the <u>Avian Knowledge</u> <u>Network (AKN)</u>. The AKN data is based on a growing collection of <u>survey</u>, <u>banding</u>, <u>and citizen science</u> <u>datasets</u> and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (<u>Eagle Act</u> requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the <u>Rapid Avian Information Locator (RAIL) Tool</u>.

# What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the <u>Avian Knowledge Network (AKN)</u>. This data is derived from a growing collection of <u>survey</u>, <u>banding</u>, <u>and</u> <u>citizen science datasets</u>.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

#### How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the <u>RAIL Tool</u> and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

#### What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

- 1. "BCC Rangewide" birds are <u>Birds of Conservation Concern</u> (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
- 2. "BCC BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
- 3. "Non-BCC Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the <u>Eagle Act</u> requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

#### Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the <u>Northeast Ocean Data</u> <u>Portal</u>. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the <u>NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird</u> <u>Distributions and Abundance on the Atlantic Outer Continental Shelf</u> project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the <u>Diving Bird Study</u> and the <u>nanotag studies</u> or contact <u>Caleb Spiegel</u> or <u>Pam Loring</u>.

#### What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to <u>obtain a permit</u> to avoid violating the Eagle Act should such impacts occur.

#### Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn

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more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

# Facilities

## National Wildlife Refuge lands

Any activity proposed on lands managed by the <u>National Wildlife Refuge</u> system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

## Fish hatcheries

There are no fish hatcheries at this location.

# Wetlands in the National Wetlands Inventory (NWI)

Impacts to <u>NWI wetlands</u> and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local <u>U.S. Army Corps of</u> <u>Engineers District</u>.

### This location did not intersect any wetlands mapped by NWI.

**NOTE:** This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

#### Data limitations

#### IPaC: Explore Location resources

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

#### Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

#### Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

#### NC Natural Heritage Program Threatened & Endangered Species List Former Lucas Cleaners Greensboro, Guilford County, NC DCSA ID No. DC410049

			NC	Federal		Global		
Common Name	Scientific Name	Taxonomic Group	Status	Status	State Rank	Rank	County	Habitat Comment
Dald Carls		Diad	-	DODA		05	Cuilferral	mature forests near large bodies of water (nesting); rivers, lakes, and sounds
Bald Eagle	Haliaeetus leucocephalus	Bilu Massular Diant		DGPA	536,53N	Go	Guillord	(ioraging) [breeding evidence only]
Schweinitz's Suntiower	Heliantnus schweinitzli	Vascular Plant	E	E	53	G3	Guilford	open woods, roadsides, and other rights-or-way
Tricolored Bat	Perimyotis subflavus	Mammal	E	PE	S3	G3G4	Guilford	dark and sheltered places
Small Whorled Pogonia	Isotria medeoloides	Vascular Plant	Т	Т	S1	G2G3	Guilford	forests, especially with white pine
Triangle Floater	Alasmidonta undulata	Freshwater Bivalve	Т	none	S3	G4	Guilford	Roanoke, Chowan, Tar, Neuse, Cape Fear drainages
Mala Calamandan		Amerikian	66		6060	05	Quilfand	breeds in fish-free semipermanent woodland ponds; forages in adjacent
Mole Salamander	Ambystoma taipoideum	Amphibian	50	none	5253	65	Guillord	woodialius
Grassnopper Sparrow	Ammodramus savannarum	Bira	W1,W5	none	53B,51N	G5	Guilford	pastures and other grassiands [breeding season only]
American Barberry	Berberis canadensis	Vascular Plant	SC-V	none	S2	G3G4	Guilford	
American Bumble Bee	Bombus pensylvanicus	Sawfly, Wasp, Bee, or Ant	VV3	none	\$3\$4	G3G4	Guilford	open habitats, fields
Greensboro Burrowing Crayfish	Cambarus catagius	Crustacean	SC	none	S1	G2	Guilford	Cape Fear and Yadkin-Pee Dee drainages; Greensboro area to the Uwharries (endemic to North Carolina)
Carolina Ladle Crayfish	Cambarus davidi	Crustacean	SR	none	S3	G3	Guilford	Neuse and Cape Fear drainages (endemic to North Carolina)
Dissected Toothwort	Cardamine dissecta	Vascular Plant	SC-V	none	S2	G4?	Guilford	rich woods, cove forests, bottomlands
Limestone Meadow Sedge	Carex granularis	Vascular Plant	W7	none	S1?	G5	Guilford	piedmont bottomlands, coastal plain marl forests
Scarlet Snake	Cemophora coccinea	Reptile	W1,W5	none	S3	G5	Guilford	sandhills, sandy woods, and other dry woods
Piedmont Horsebalm	Collinsonia tuberosa	Vascular Plant	SR-P	none	S1S2	G3G4	Guilford	rich hardwood forests
	-							cliffs or ledges for nesting; forests or fields (mainly at high elevations) for
Common Raven	Corvus corax	Bird	W2	none	S3	G5	Guilford	foraging [breeding evidence only]
Large-bract Tick-trefoil	Desmodium cuspidatum var. cuspidatum	Vascular Plant	W7	none	S2?	G5T5?	Guilford	roadsides and wooded banks of rivers and streams
Crested Woodfern	Dryopteris cristata	Vascular Plant	W1	none	S3	G5	Guilford	bogs, wet woods
Carolina Slabshell	Elliptio congaraea	Freshwater Bivalve	W2,W5	none	S3	G3	Guilford	drainages north to the White Oak drainage
Willow Flycatcher	Empidonax traillii	Bird	W2	none	S3B	G5	Guilford	wet thickets in open country, often along streams in broad valleys [breeding season only]
Dusky Grasshopper	Encoptolophus sordidus	Grasshopper or Katydid	W4	none	SU	G5	Guilford	from the state, but no locality or habitat information available
Narrowleaf Willowherb	Epilobium leptophyllum	Vascular Plant	W1	none	S2S3	G5	Guilford	bogs and seeps
Carolina Darter	Etheostoma collis	Freshwater Fish	SC	none	S3	G3	Guilford	Roanoke, Tar, Neuse, Cape Fear, Yadkin-Pee Dee, and Catawba drainages
								Cape Fear, Neuse, and Tar drainage populations have limited distribution; Pee
Fantail Darter	Etheostoma flabellare	Freshwater Fish	W5	none	S3	G5	Guilford	Dee, Roanoke, New, and French Broad populations stable
Eastern Wahoo	Euonymus atropurpureus	Vascular Plant	W7	none	S2	G5	Guilford	levee forests and rich forests with circumneutral soils
Four-toed Salamander	Hemidactylium scutatum	Amphibian	SC	none	S3	G5	Guilford	pools, bogs, and other wetlands in hardwood forests
Leonard's Skipper	Hesperia leonardus	Butterfly	W2	none	S2S3	G4	Guilford	wooded borders and openings, brushy fields; host plants grasses
Large Whorled Pogonia	Isotria verticillata	Vascular Plant	W1	none	S2S3	G5	Guilford	forests
Loggerhead Shrike	Lanius Iudovicianus	Bird	SC, W2	none	S2S3B,S3N	G4	Guilford	fields and pastures [breeding season only]
Amber-winged Spreadwing	Lestes eurinus	Dragonfly or Damselfly	W2	none	S3	G5	Guilford	lakes and ponds with emergent vegetation
Sweetflag Spreadwing	Lestes forcipatus	Dragonfly or Damselfly	SR	none	S1S2	G5	Guilford	vegetated ponds
Hooded Merganser	Lophodytes cucullatus	Bird	W3	none	S1B,S4N	G5	Guilford	lakes and ponds, with dead trees for nesting [breeding evidence only]
Long-tailed Weasel	Neogale frenata (syn. Mustela frenata)	Mammal	W3	none	S3	G5	Guilford	forests, brushy areas
Yellow-crowned Night-Heron	Nyctanassa violacea	Bird	SR	none	S2B	G5	Guilford	inland swamps; woods or thickets on maritime islands [breeding evidence only]
Southern Sundrops	Oenothera unguiculata	Vascular Plant	SR-T	none	S1S2	G5T2T3	Guilford	wet clay savannas (Carteret*, Dare, Jones, New Hanover, Onslow, Pender)
Appalachian Snaketail	Ophiogomphus incurvatus	Dragonfly or Damselfly	W2	none	S3	G3	Guilford	small to medium streams
Glade Wild Quinine	Parthenium auriculatum	Vascular Plant	SR-T	none	S3	G3G4	Guilford	glades and openings over mafic rocks
Bachman's Sparrow	Peucaea aestivalis	Bird	SC	none	S3B,S2N	G3	Guilford	open longleaf pine forests, old fields [breeding evidence only]
Purple Fringeless Orchid	Platanthera peramoena	Vascular Plant	Т	none	S2	G5	Guilford	bogs, forests
			_					dry woodlands and openings (especially over mafic rocks), longleaf pine
Heller's Rabbit-Tobacco	Pseudognaphalium helleri	Vascular Plant	E	none	S2S3	G4G5T3T4	Guilford	sanonilis
American Shinleaf	Pyrola americana	Vascular Plant	W1	none	S2S3	G5	Guilford	TORESTS

#### NC Natural Heritage Program Threatened & Endangered Species List Former Lucas Cleaners Greensboro, Guilford County, NC DCSA ID No. DC410049

Swamp White Oak	Quercus bicolor	Vascular Plant	W1	none	S2	G5	Guilford	upland swamp forests
Chinquapin Oak	Quercus muehlenbergii	Vascular Plant	W1	none	S2	G5	Guilford	calcareous forsts and bluffs
Dwarf Chinquapin Oak	Quercus prinoides	Vascular Plant	E	none	S1	G5	Guilford	dry, rocky slopes
Pale Dock	Rumex altissimus	Vascular Plant	W7	none	S2?	G5	Guilford	low wet places
American Figwort	Scrophularia lanceolata	Vascular Plant	SR-P	none	S1	G5	Guilford	woodlands and forests
Blue Ridge Carrion-flower	Smilax lasioneura	Vascular Plant	SR-P	none	S1	G5	Guilford	oak-hickory forests over mafic rocks
Slender Wedgegrass	Sphenopholis intermedia	Vascular Plant	W7	none	S2	G5	Guilford	moist nutrient-rich forests, barrens, meadows
Lowland Loosestrife	Steironema hybridum	Vascular Plant	SR-P	none	S2?	G5	Guilford	bottomlands
Appalachian Golden-banner	Thermopsis mollis	Vascular Plant	SR-T	none	S2	G3G4	Guilford	dry ridges and open woodlands
								bogs, peaty wetlands, drawdown sloughs along rivers, drawdown shorelines along man-made reservoirs (Anson, Bertie, Davidson, Forsyth*, Harnett*,
Marsh St. John's-wort	Triadenum tubulosum	Vascular Plant	SR-O	none	S2	G4?	Guilford	Watauga*).
Southern Nodding Trillium	Trillium rugelii	Vascular Plant	W1	none	S3	G4	Guilford	rich woods and coves over mafic and calcareous rocks
Smooth Lesser Horse-gentian	Triosteum angustifolium var. angustifolium	Vascular Plant	W7	none	S2	G5T5	Guilford	mesic forests, bluffs, outcrops, especially over calcareous or mafic rocks (records not yet entered)
Notched Rainbow	Villosa constricta	Freshwater Bivalve	Т	none	S3	G3	Guilford	Roanoke, Tar, Neuse, Yadkin-Pee Dee, and Catawba drainages
Eastern Creekshell	Villosa delumbis	Freshwater Bivalve	SR	none	S4	G4	Guilford	Cape Fear, Lumber, Yadkin-Pee Dee, and Catawba drainages
Carolina Creekshell	Villosa vaughaniana	Freshwater Bivalve	E	none	S3	G2G3	Guilford	Cape Fear, Yadkin-Pee Dee, and Catawba drainages (endemic to North Carolina and adjacent South Carolina)
Smooth Earthsnake	Virginia valeriae	Reptile	W2	none	S3	G5	Guilford	deciduous or mixed woods, usually in mesic soils

Notes:

E = Endangered

T = Threatened

SC = Special Concern

SR = Significantly Rare

W = Watch List

Appendix C

Notice of Dry-Cleaning Solvent Remediation Source Property: State of North Carolina, PIN 7864026603



#### **NOTICE OF DRY-CLEANING SOLVENT REMEDIATION**

Property Owner: <u>State of North Carolina</u> Recorded in Book \_\_\_\_\_, Page \_\_\_\_\_ Associated plat recorded in Plat Book \_\_\_\_\_, Page \_\_\_\_\_

This documentary component of a Notice of Dry-Cleaning Solvent Remediation (hereinafter "Notice") is hereby recorded on this \_\_\_\_\_\_ day of \_\_\_\_\_\_, 20\_\_\_\_\_ by the State of North Carolina (hereinafter "Property Owner"). The survey plat component of the Notice is being recorded concurrently with this documentary component. The real property (hereinafter "Property") which is the subject of this Notice is located at <u>1101 W Gate City Boulevard</u>, <u>Greensboro, Guilford County</u> North Carolina, Parcel Identification Number (PIN) <u>7864026603</u>.

The Property was previously contaminated with dry-cleaning solvent, as defined at North Carolina General Statutes (hereinafter "N.C.G.S."), Section (hereinafter "§") 143-215.104B(b)(9), and is the source of the contamination which constitutes the dry-cleaning solvent contamination site associated with this parcel (hereinafter "Contamination Site"). This Notice has been approved by the North Carolina Department of Environmental Quality, or its successor in function (hereinafter "DEQ") under the authority of the Dry-Cleaning Solvent Cleanup Act of 1997, as amended, N.C.G.S. § 143-215.104A *et seq.* (hereinafter "DSCA"), and is required to be filed in the Register of Deeds' Office in the county or counties in which the land is located, pursuant to NCGS § 143-215.104M. A Notice will be recorded separately in each chain of title of the Contamination Site.

Groundwater at the Property was previously contaminated with dry-cleaning solvents associated with dry-cleaning operations at the former Lucas Cleaners (DSCA Site ID DC410049) located at 1101 W Gate City Boulevard (formerly 803 Glenwood Ave) in Greensboro, Guilford County, North Carolina. Dry-cleaning operations were conducted on the Property from approximately 1956 to 2013.

Pursuant to N.C.G.S. § 143-215.104M, this Notice is being filed in order to reduce or eliminate the danger to public health or the environment posed by the Property. Attached hereto as **Exhibit A** is a reduction, to 8 1/2" x 11", of the survey plat component of the Notice required by N.C.G.S. § 143-215.104M. The survey plat has been prepared and certified by a professional

land surveyor and meets the requirements of G.S. 47-30, and contains the following information required by N.C.G.S. § 143-215.104M:

(1) A description of the location and dimensions of the areas of potential environmental concern with respect to permanently surveyed benchmarks; and

(2) The type, location and quantity of regulated dry-cleaning solvent contamination and other contaminants known to exist on the Property.

Attached hereto as **Exhibit B**, is a legal description of the Property that would be sufficient as a description in an instrument of conveyance.

Pursuant to NCGS § 143-215.104M, a certified copy of this Notice must be filed within 15 days of receipt of DEQ's approval of the Notice or the effective date of the dry-cleaning solvent remediation agreement, whichever is later. Pursuant to NCGS § 143-215.104M, the copy of the Notice certified by DEQ must be recorded in the grantor index under the names of the owners of the land.

#### **LAND-USE RESTRICTIONS**

NCGS § 143-215.104M requires that the Notice identify any restrictions on the current and future use of the Property that are necessary or useful to maintain the level of protection appropriate for the designated current or future use of the Property and that are designated in the dry-cleaning remediation agreement. The restrictions shall remain in force in perpetuity unless canceled by the Secretary of DEQ, or his/her designee, after the hazards have been eliminated, pursuant to NCGS §143-215.104M. Those restrictions are hereby imposed on the Property, and are as follows:

- 1. No person conducting environmental assessment or remediation at the Property or involved in determining compliance with applicable land-use restrictions, at the direction of, or pursuant to a permit or order issued by DEQ may be denied access to the Property for the purpose of conducting such activities.
- 2. The owner of any portion of the Property shall cause the instrument of any sale, lease, grant, or other transfer of any interest in the property to include a provision expressly requiring the lessee, grantee, or transferee to comply with this Notice. The failure to include such a provision shall not affect the validity or applicability of any land-use restriction in this Notice.

#### **RIGHT OF ENTRY**

The property owner grants and conveys to DEQ, its agents, contractors, and employees, and any person performing pollution remediation activities under the direction of DEQ, access at reasonable times and under reasonable security requirements to the Property to determine and monitor compliance with the land-use restrictions set forth in this Notice. Such investigations and actions are necessary by DEQ to ensure that use, occupancy, and activities of and at the Property

are consistent with the land-use restrictions and to ensure that the structural integrity and continued effectiveness of any engineering controls (if appropriate) described in the Notice are maintained. Whenever possible, at least 48 hours advance notice will be given to the Property Owner prior to entry. Advance notice may not always be possible due to conditions such as response time to complaints and emergency situations.

#### **REPRESENTATIONS AND WARRANTIES**

The Property Owner hereby represents and warrants to the other signatories hereto:

- i) that the Property Owner is the sole owner of the Property; **or** that the Property Owner has provided to DEQ the names of all other persons that own an interest in or hold an encumbrance on the Property and have notified such persons of the Property Owner's intention to enter into this Notice;
- ii) that the Property Owner has the power and authority to enter into this Notice, to grant the rights and interests herein provided and to carry out all obligations hereunder; and
- iii) that this Notice will not materially violate or contravene or constitute a material default under any other agreement, document or instrument to which the Property Owner is a party or by which the Property Owner may be bound or affected.

#### **ENFORCEMENT**

The above land-use restrictions shall be enforceable without regard to lack of privity of estate or contract, lack of benefit to particular land, or lack of any property interest in particular land. The land-use restrictions shall be enforced by any owner of the Property. The land-use restrictions may also be enforced by DEQ through the remedies provided in NCGS § 143-215.104P or by means of a civil action; by any unit of local government having jurisdiction over any part of the Property; and by any person eligible for liability protection under the DSCA who will lose liability protection if the restrictions are violated. Any attempt to cancel any or all of this Declaration without the approval of the Secretary of DEQ (or its successor in function), or his/her delegate, shall be subject to enforce any of the above restrictions shall in no event be deemed a waiver of the right to do so thereafter as to the same violation or as to one occurring prior or subsequent thereto.

If a land-use restriction set out in this Notice required under NCGS § 143-215.104.M is violated, the owner of the Property at the time the land-use restriction is violated, the owner's successors and assigns, and the owner's agents who direct or contract for alteration of the contamination site in violation of a land-use restriction shall be liable for remediation of all contaminants to unrestricted use standards.

#### **FUTURE SALES, LEASES, CONVEYANCES AND TRANSFERS**

When any portion of the Property subject to this Notice is sold, leased, conveyed or transferred, the deed or other instrument of transfer shall contain in the description section, in no smaller type than that used in the body of the deed or instrument, (1) a statement that the property has been contaminated with dry-cleaning solvent and, if appropriate, cleaned up under the Act and (2) a reference by book and page to the recordation of this Notice.

The Property Owner shall notify DEQ within fourteen (14) calendar days of the effective date of any conveyance, grant, gift, or other transfer, whole or in part, of the Property Owner's interest in the Property. This notification shall include the name, business address and phone number of the transferee and the expected date of transfer.

The Property Owner shall notify DEQ within thirty (30) days following the petitioning or filing of any document by any person initiating a rezoning of the Property that would change the base zone of the Property.

This provision shall not apply to leases that do not provide for the right to take actions that would violate the prohibitions and restrictions of this Notice.

#### PROPERTY OWNER SIGNATURE

IN WITNESS WHEREOF, Property Owner has caused this instrument to be duly executed this \_\_\_\_\_ day of \_\_\_\_\_\_, 20\_\_\_\_.

State of North Carolina

By:\_\_\_\_\_

Printed Name:\_\_\_\_\_

STATE OF \_\_\_\_\_ COUNTY OF \_\_\_\_\_

I, \_\_\_\_\_\_, a Notary Public of the county and state aforesaid, certify that \_\_\_\_\_\_\_, personally came before me this day and acknowledged that he/she is the \_\_\_\_\_\_\_ <tildette certified that he/she is the \_\_\_\_\_\_\_\_ <tildette certified that he/she is the \_\_\_\_\_\_\_\_\_ of the State of North Carolina, and that by authority duly given and as the act of the State, the foregoing Notice of Dry-Cleaning Solvent Remediation was signed in its name by him/her.

WITNESS my hand and official stamp or seal, this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Name typed or printed Notary Public

#### APPROVAL AND CERTIFICATION

The foregoing Notice of Dry-Cleaning Solvent Remediation is hereby approved and certified.

North Carolina Department of Environmental Quality

By:

William F. Hunneke Chief, Superfund Section Division of Waste Management

Date

#### **LIMITED POWER OF ATTORNEY**

I\_\_\_\_\_\_"Property Owner Representative", do hereby grant a limited power of attorney to DEQ and to DEQ's independent contractors, as follows:

DEQ and DEQ's independent contractors shall have the limited power of attorney to record this Notice, including its documentary and survey plat components, in accordance with N.C.G.S. § 143-215.104M on my "Property Owner" behalf. This limited power of attorney shall terminate upon completion of the recordation of the Notice.

Signature of Property Owner

Dated this \_\_\_\_\_\_, 20\_\_\_\_,

STATE OF \_\_\_\_\_\_ COUNTY OF \_\_\_\_\_\_

I, \_\_\_\_\_a Notary Public, do hereby certify that \_\_\_\_\_\_ personally appeared before me this day

and signed this "Limited Power of Attorney".

WITNESS my hand and official stamp or seal, this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_.

Name typed or printed Notary Public

My Commission expires: \_\_\_\_\_\_ [Stamp/Seal]

#### **<u>CERTIFICATION OF REGISTER OF DEEDS</u>**

The foregoing documentary component of the Notice of Dry-Cleaning Solvent Remediation, and the associated plat, are certified to be duly recorded at the date and time, and in the Book and on the Page(s), shown on the first page hereof.

Register of Deeds for Guilford County

By:

(signature)

Date

Name typed or printed:

Deputy/Assistant Register of Deeds

### EXHIBIT A

### **REDUCTION OF SURVEY PLAT**

PICKUP: CITY OF GREENSBORO



PLAT BOOK \_

PAGE .

#### EXHIBIT B

#### **PROPERTY LEGAL DESCRIPTION**

#### EAST PARCEL (809, 813, 815 AND 817 GLENWOOD AVENUE):

COMMENCING FROM A NEW IRON PIPE SET LOCATED IN THE SOUTHEASTERN INTERSECTION OF GATE CITY BOULEVARD (S. R. 4240, A 80' PUBLIC RIGHT-OF-WAY, FORMERLY KNOWN AS WEST LEE STREET) AND GLENWOOD AVENUE (A 50' PUBLIC RIGHT-OF-WAY) AND BEING THE NORTHWEST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0005866 (DEED BOOK 7268, PAGE 1738 AND PLAT BOOK 184, PAGE 100), ALSO BEING THE POINT AND PLACE OF THE BEGINNING. THENCE LEAVING SAID GLENWOOD AVENUE AND ALONG SAID GATE CITY BOULEVARD, N 82° 36' 33" E 330.01 FEET TO A NEW IRON PIPE SET, SAID PIPE BEING LOCATED IN THE SOUTHWESTERN INTERSECTION OF SAID GATE CITY BOULEVARD AND LEXINGTON AVENUE (A 50' PUBLIC RIGHT-OF-WAY), AND BEING THE NORTHEASTERN CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005866); THENCE LEAVING SAID GATE CITY BOULEVARD AND ALONG SAID LEXINGTON AVENUE, S 03°10' 49" W 207.71 FEET TO AN EXISTING 1" IRON PIPE, SAID IRON PIPE BEING THE SOUTHEASTERN CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005866) AND THE NORTHEASTERN CORNER OF BULENT BEDIZ, PARCEL NO. 0005884 (DEED BOOK 6215, PAGE 1913); THENCE LEAVING SAID LEXINGTON AVENUE AND ALONG SAID BEDIZ NORTHERN PROPERTY LINE AND SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005866) SOUTHERN PROPERTY LINE, N 87º 08' 30" W 155.92 FEET TO A W" IRON PIPE, SAID IRON FIPE BEING LOCATED ON THE EASTERN LINE OF AN ABANDONED ALLEY (NO RECORD TO BE FOUND AT THE TIME OF THIS SURVEY); THENCE CROSSING SAID ABANDONED ALLEY, N 86° 37' 49" W 12.23 FEET TO AN EXISTING 1/" IRON PIPE, SAID IRON PIPE BEING THE NORTHWEST CORNER OF SAID ABANDONED ALLEY; THENCE WITH THE SAID ABANDONED ALLEY, S 04° 54' 46" W 49.92 FEET TO AN EXISTING 1/2" IRON PIPE, SAID IRON PIPE BEING THE SOUTHEAST CORNER OF SAID CAPITAL FACILITIES FOUNDATION. INC., (PARCEL NO. 0005866) AND THE NORTHEAST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0005873 (DEED BOOK 7279, PAGE 648); THENCE WITH SAID ABANDONED ALLEY, S 03° 14' 58" W 49.87 FEET TO AN EXISTING 1/2" IRON PIPE, SAID IRON PIPE BEING THE SOUTHEAST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005873) AND THE NORTHEAST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0005874 (DEED BOOK 7279, PAGE 646); THENCE WITH SAID ABANDONED ALLEY, S 03° 24' 32" W 49.90 FEET TO AN EXISTING 1/2" IRON PIPE, SAID IRON PIPE BEING THE SOUTHEAST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO, 0005874) AND THE NORTHEAST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0005875 (DEED BOOK 7279, PAGE 644); THENCE ALONG SAID ABANDONED ALLEY, S 03° 11' 23" W 49.94 FEET TO AN EXISTING 1/2" IRON PIPE, SAID IRON PIPE BEING THE SOUTHEAST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005875) AND THE NORTHEAST CORNER OF ASHLYN ROBERTS-LANDRETH, PARCEL NO. 0005876 (DEED BOOK 4517, PAGE 1243); THENCE LEAVING SAID ABANDONED ALLEY AND ALONG THE NORTHERN PROPERTY LINE OF SAID ROBERTS-LANDRETH, N 86° 33' 19" W 155.88 FEET TO AN EXISTING 1/2" IRON PIPE, SAID IRON PIPE BEING LOCATED ON THE EASTERN RIGHT-OF-WAY OF SAID GLENWOOD AVENUE AND BEING THE SOUTHWESTERN CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005875) AND THE NORTHWEST CORNER OF SAID ROBERTS-LANDRETH; THENCE WITH SAID GLENWOOD AVENUE, N 03° 03' 23" E 49.98 FEET TO A 1/2" IRON PIPE, SAID IRON PIPE BEING THE NORTHWEST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005875) AND THE SOUTHWEST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005874); THENCE WITH SAID GLENWOOD AVENUE, N 03° 25' 43" E 49.76 FEET TO AN EXISTING 1/2" IRON PIPE, SAID IRON PIPE BEING THE NORTHWEST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005874) AND THE SOUTHWEST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005873); THENCE WITH SAID GLENWOOD AVENUE, N 03° 13' 20" E 49.85 FEET TO AN EXISTING 1" IRON PIPE, SAID IRON PIPE BEING THE NORTHWEST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005873) AND THE SOUTHWEST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0005866); THENCE WITH SAID GLENWOOD AVENUE, N 03° 31' 33" E FOR A TOTAL DISTANCE OF 197.28 FEET (PASSING THROUGH AN EXISTING 3/2" BENT IRON PIPE A DISTANCE OF 54.28 FEET) TO THE POINT AND PLACE OF THE BEGINNING. CONTAINING 2.047 ACRES, MORE OR LESS.

Appendix D

Notice of Dry-Cleaning Solvent Remediation Off-Source Property: State of North Carolina, PIN 7864022530



#### **NOTICE OF DRY-CLEANING SOLVENT REMEDIATION**

Property Owner: <u>State of North Carolina</u> Recorded in Book \_\_\_\_\_, Page \_\_\_\_\_ Associated plat recorded in Plat Book \_\_\_\_\_, Page \_\_\_\_\_

This documentary component of a Notice of Dry-Cleaning Solvent Remediation (hereinafter "Notice") is hereby recorded on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. The survey plat component of the Notice is being recorded concurrently with this documentary component. The real property (hereinafter "Property") which is the subject of this Notice is located at <u>1201 W</u> <u>Gate City Boulevard, Greensboro, Guilford County,</u> North Carolina, Parcel Identification Number (PIN) 7864022530.

The Property is contaminated with dry-cleaning solvent, as defined at North Carolina General Statutes (hereinafter "N.C.G.S."), Section (hereinafter "§") 143-215.104B(b)(9), and other contaminants. This Notice has been approved by the North Carolina Department of Environmental Quality, or its successor in function (hereinafter "DEQ") under the authority of the Dry-Cleaning Solvent Cleanup Act of 1997, as amended, N.C.G.S. § 143-215.104A *et seq.* (hereinafter "DSCA"), and is required to be filed in the Register of Deeds' Office in the county or counties in which the land is located, pursuant to NCGS § 143-215.104I. A Notice will be recorded separately in each chain of title of the Contamination Site.

Groundwater under the Property is contaminated with dry-cleaning solvents associated with dry-cleaning operations at the former Lucas Cleaners (DSCA Site DC410049) located at 1101 W Gate City Boulevard, Greensboro, Guilford County, North Carolina. A risk assessment of the contaminated property concluded that the dry-cleaning solvent contamination poses no unacceptable risk as long as groundwater on the property is not used as a source of water for any water supply wells.

Pursuant to N.C.G.S. § 143-215.104I, this Notice is being filed in order to reduce or eliminate the danger to public health or the environment posed by the Property. Attached hereto as **Exhibit A** is a reduction, to 8  $1/2" \times 11"$ , of the survey plat component of the Notice required by N.C.G.S. § 143-215.104M. The survey plat has been prepared and certified by a professional land surveyor and meets the requirements of G.S. 47-30, and contains the following information required by N.C.G.S. § 143-215.104M:

(1) A description of the location and dimensions of the areas of potential environmental concern with respect to permanently surveyed benchmarks; and

(2) The type, location and quantity of regulated dry-cleaning solvent contamination and other contaminants known to exist on the Property.

Attached hereto as **Exhibit B** is a legal description of the Property that would be sufficient as a description in an instrument of conveyance.

#### **USE OF GROUNDWATER PROHIBITED BY STATE AND LOCAL REGULATIONS**

Groundwater on this property contains contaminants that exceed unrestricted use standards. Pursuant to 15A North Carolina Administrative Code 02C .0107(b)(1), "(t)he source of water for any water supply well shall not be from a water bearing zone or aquifer that is contaminated." Therefore, state law prohibits construction of a water supply well on this property unless it can be demonstrated that the water pumped from the well is not contaminated. Further, pursuant to North Carolina General Statute 87-88(c) and 15A North Carolina Administrative Code 02C .0112(a), no well may be constructed or maintained in a manner whereby it could be a source or channel of contamination of the groundwater supply or any aquifer.

#### **FUTURE SALES, LEASES, CONVEYANCES AND TRANSFERS**

When any portion of the Property is sold, leased, conveyed, or transferred, pursuant to NCGS § 143-215.104M the deed or other instrument of transfer shall contain in the description section, in no smaller type than that used in the body of the deed or instrument, a statement that the Property has been contaminated with dry-cleaning solvent and, if appropriate, cleaned up under the DSCA.

This provision shall not apply to leases that do not provide for the right to take actions that would violate the prohibitions and restrictions of this Notice.

#### **CANCELLATION OF THE NOTICE**

The Notice may, at the request of the Property Owner, be canceled by DEQ after the risk to public health and the environment associated with the dry-cleaning solvent contamination and any other contaminants included in the DSCA Remediation Agreement have been eliminated as a result of remediation of the Property to unrestricted use standards.
# APPROVAL AND CERTIFICATION OF NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY

The foregoing Notice of Dry-Cleaning Solvent Remediation is hereby approved and certified.

North Carolina Department of Environmental Quality

By:

William F. Hunneke Chief, Superfund Section Division of Waste Management

Date

### STATE OF NORTH CAROLINA COUNTY OF GUILFORD

I, \_\_\_\_\_, a Notary Public of Guilford County and State of North Carolina do hereby certify that \_\_\_\_\_\_ did

personally appeared before me this the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Name typed or printed Notary Public

My Commission expires: \_\_\_\_\_\_ [Stamp/Seal]

## **CERTIFICATION OF REGISTER OF DEEDS**

The foregoing documentary component of the Notice of Dry-Cleaning Solvent Remediation, and the associated plat, are certified to be duly recorded at the date and time, and in the Books and Pages, shown on the first page hereof.

Register of Deeds for Guilford County

By: \_\_\_\_\_

Date

Name typed or printed: \_\_\_\_\_

Deputy/Assistant Register of Deeds

# EXHIBIT A

# SURVEY PLAT REDUCTION

PICKUP: CITY OF GREENSBORO



PLAT BOOK \_

PAGE .

#### EXHIBIT B

#### **PROPERTY LEGAL DESCRIPTION**

BEING all those certain tracts, parcels or pieces of land, lying and being in Morehead Township, Guilford County, North Carolina, being more particularly described as follows:

WEST PARCEL (1231, 1227, 1225, AND 1201 WEST GATE CITY BOULEVARD, 801, 812, 814, 816, 818, AND 820 GLENWOOD AVENUE, 803, 805, 807, 809 AND 833 MCCORMICK STREET)

COMMENCING FROM A NEW IRON PIPE SET ON THE SOUTHEASTERN INTERSECTION OF GATE CITY BOULEVARD (S.R. 4240, AN 80' PUBLIC RIGHT-OF-WAY, FORMERLY KNOWN AS WEST LEE STREET) AND MCCORMICK STREET (A 50' PUBLIC RIGHT-OF-WAY), AND BEING THE NORTHWEST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009160 (DEED BOOK 6993, PAGE 799), SAID IRON PIPE BEING THE POINT AND PLACE OF THE BEGINNING. THENCE WITH SAID GATE CITY BOULEVARD, N 81° 43'02" E A TOTAL DISTANCE OF 331.37 FEET TO A NEW IRON PIPE SET, SAID IRON PIPE BEING THE NORTHEAST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009159 (DEED BOOK 7592, PAGE 1582) AND BEING IN THE SOUTHWEST INTERSECTION OF SAID GATE CITY BOULEVARD AND GLENWOOD AVENUE (A 50' PUBLIC RIGHT-OF-WAY), THENCE LEAVING SAID GATE CITY BOULEVARD AND ALONG SAID GLENWOOD AVENUE, S 03º 17' 28" W 134.58 FEET TO AN EXISTING 1/2" IRON PIPE, SAID IRON PIPE BEING LOCATED IN THE CENTER OF AN ALLEY (PLAT BOOK 2, PAGE 104); THENCE WITH SAID GLENWOOD AVENUE, S 03° 30' 50" W 50.06 FEET TO AN EXISTING 1/2" IRON PIPE, SAID IRON PIPE BEING THE SOUTHEAST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009140 (DEED BOOK 7592, PAGE 1582) AND THE NORTHEASTERN CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009141 (DEED BOOK 7592, PAGE 1582); THENCE CONTINUING WITH SAID GLENWOOD AVENUE, S 03° 20' 56" W 52.98 FEET TO AN EXISTING 1/2" IRON PIPE, SAID IRON PIPE BEING THE SOUTHEAST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009141, AND BEING THE NORTHEAST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009142 (DEED BOOK 7251, PAGE 1615); THENCE WITH SAID GLENWOOD AVENUE, \$ 03° 19' 49" W 49.68 FEET TO A BOLT, SAID BOLT BEING THE SOUTHEAST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009142, AND BEING THE NORTHEAST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009143 (DEED BOOK 7279, PAGE 642); THENCE ALONG SAID GLENWOOD AVENUE, S 03° 24' 26" W 50.13 FEET TO AN EXISTING 3" IRON PIPE, SAID IRON PIPE BEING THE SOUTHEAST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009143, AND BEING THE NORTHEAST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009144 (DEED BOOK 7279, PAGE 640), THENCE ALONG SAID GLENWOOD AVENUE, S 03° 35' 51" W 49.87 FEET TO AN EXISTING 1/2" IRON ROD, SAID IRON ROD BEING THE SOUTHEAST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009144 AND THE NORTHEAST CORNER OF MICHAEL L. JACKE, PARCEL NO. 0009145 (DEED BOOK 4030, PAGE 1897); THENCE LEAVING SAID GLENWOOD AVENUE AND ALONG SAID CAPITAL FACILITIES FOUNDATION, INC. (PARCEL NO. 0009144), AND SAID JACKE PROPERTY, N 86° 38' 08" W 155.78 FEET TO AN EXISTING %" IRON PIPE, SAID IRON PIPE BEING THE SOUTHWEST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009144 AND BEING THE NORTHWEST CORNER OF SAID JACKE PROPERTY, SAID IRON PIPE ALSO BEING LOCATED ON THE EASTERN LINE OF AN ABANDONED ALLEY (NO DEED RECORD FOUND AT THE TIME OF THIS SURVEY); THENCE CROSSING SAID ABANDONED ALLEY, N 86° 38' 08" W 12.82 FEET TO A NEW IRON PIPE SET, SAID IRON PIPE BEING THE SOUTHEAST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009155 (DEED BOOK 7414, PAGE 986) AND THE NORTHEAST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009154 (DEED BOOK 7414, PAGE 986); THENCE ALONG THE WESTERN LINE OF SAID ABANDONED ALLEY, S 03° 30' 36"W 199.62 FEET TO AN EXISTING 1/2" IRON PIPE, SAID IRON PIPE BEING THE SOUTHEAST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009153 (DEED BOOK 7414, PAGE 986) AND THE NORTHEAST CORNER OF STATE OF NORTH CAROLINA, PARCEL D009152 (DEED BOOK 7550, PAGE 523); THENCE LEAVING SAID ABANDONED ALLEY AND WITH SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0009153) AND SAID STATE OF NORTH CAROLINA (PARCEL NO. 0009152) N 86° 28'56" W 155.12 FEET TO AN EXISTING 1/3" IRON PIPE, SAID IRON PIPE BEING THE NORTHWEST CORNER OF SAID STATE OF NORTH CAROLINA (PARCEL NO. 0009152), THE SOUTHWEST CORNER OF CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0009153), AND ON THE EASTERN RIGHT-OF-WAY OF McCORMICK STREET; THENCE WITH SAID McCORMICK STREET, N 03° 24' 01" E 49.95 FEET TO AN EXISTING 1" IRON PIPE, SAID IRON PIPE BEING THE NORTHWEST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0009153) AND THE SOUTHWEST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., PARCEL NO. 0009154; THENCE ALONG SAID McCORMICK STREET, N 03° 14' 52" E 150.08 FEET TO AN EXISTING 1" IRON PIPE, SAID IRON PIPE BEING THE NORTHWEST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0009154) AND THE SOUTHWEST CORNER OF SAID CAPITAL FACILITIES FOUNDATION, INC., (PARCEL NO. 0009155); THENCE WITH SAID McCORMICK STREET, N 03° 22' 55" E 319.56 FEET TO THE POINT AND PLACE OF THE BEGINNING. CONTAINING 3.70 ACRES, MORE OR LESS.

Appendix E

**Example Documents Announcing the Public Comment Period** 



## **Public Notice**

### SUMMARY OF NOTICE OF INTENT TO REMEDIATE A DRY-CLEANING SOLVENT FACILITY OR ABANDONED SITE

## N.C. Department of Environmental Quality Division of Waste Management Dry-Cleaning Solvent Cleanup Act (DSCA) Program

Former Lucas Cleaners DSCA Site ID DC410049

Pursuant to N.C.G.S. §143-215.104L, on behalf of the State of North Carolina, the North Carolina Department of Environmental Quality's (NCDEQ's) private contractor has prepared a Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site (NOI). The purpose of this Summary of the NOI is to notify the community of the proposed remedy for the contamination site and invite comment on the proposed remedy.

Former Lucas Cleaners conducted dry-cleaning operations using tetrachloroethylene at the property located at 1101 West Gate City Boulevard in Greensboro, North Carolina. Dry-cleaning solvent contamination in soil and/or groundwater has been identified at the following parcel:

1201 West Gate City Boulevard, in Greensboro; Parcel No. 7864022530

An investigation of the extent of contamination has been completed. A risk assessment of the contaminated property concluded that the contamination poses no unacceptable risks. A Risk Management Plan (RMP) has been prepared which proposes using land-use controls to prevent current and future risks at the affected property.

The elements of the complete NOI are included in the RMP which is available online at http://portal.ncdenr.org/web/wm/DSCA/PublicNotices.

The public comment period begins \_\_\_\_\_, 20\_\_, and ends \_\_\_\_\_, 20\_\_.

Comments must be in writing and submitted to NCDEQ no later than \_\_\_\_\_\_, 20\_\_\_. Written requests for a public meeting may be submitted to NCDEQ no later than \_\_\_\_\_\_, 20\_\_\_. Requests for additional information should be directed to Scott Stupak at (919) 707-8359. All comments and requests should be sent to:

Scott Stupak, DSCA Remediation Unit Division of Waste Management, NCDEQ 1646 Mail Service Center Raleigh, North Carolina 27699-1646



### <mark><date></mark>

<property owner> <mailing address> <city, state, zip>

Subj: Dry-Cleaning Solvent Contamination Associated with Former Lucas Cleaners 1101 West Gate City Boulevard, Greensboro, Guilford County, NC DSCA Site ID DC410049

Dear <property owner>:

You are receiving this letter because your property at <a href="editation-complete: solution-complete: solut

The attached Summary of the Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site (NOI) provides a brief description of the proposed remedy, a web link to the complete NOI, and the dates and procedures for commenting on the proposed remedy. If you do not have access to the internet, we ask that you contact us to request a hard copy of the complete NOI.

If you have questions, please contact me at scott.stupak@deq.nc.gov or (919) 707-8359.

Sincerely,

Scott Stupak, DSCA Project Manager Division of Waste Management, NCDEQ

Attachments: Summary of the NOI cc: DSCA Site ID DC410049 File





<date>

<property owner> <address> <city, state, zip>

Subj: Dry-Cleaning Solvent Contamination Associated with Former Lucas Cleaners 1101 West Gate City Boulevard, Greensboro, Guilford County, NC DSCA Site ID 410049

Dear <property owner>:

The Dry-Cleaning Solvent Clean-up Act (DSCA) Program has completed an assessment of the dry-cleaning solvent contamination associated with the Former Lucas Cleaners at 1101 West Gate City Boulevard, Greensboro, North Carolina. The property is currently occupied by the Spartan Village student housing for University of North Carolina at Greensboro (UNCG). A Risk Management Plan (RMP) to address the site contamination has been prepared. You are receiving this letter in accordance with the DSCA Program's statutes, which provide the community an opportunity to review and comment on the proposed RMP. Attached is a *Summary of the Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site* which provides a brief description of the proposed remedy, a web link with more details, and the dates and procedures for commenting on the proposed RMP. We ask that you review these documents. If you do not have access to the internet, we ask that you contact us to request a hard copy.

You are also receiving this letter because your property at 1201 West Gate City Boulevard, Greensboro, North Carolina, lies within an area where dry-cleaning solvents have been detected in groundwater. An evaluation of the risks concluded that the contamination poses no unacceptable risks for the current use of your property. However, because groundwater under your property is contaminated, state regulations prohibit the installation of a water supply well on this property. If the RMP is approved, a notice will be recorded in the chain of title indicating that groundwater is contaminated with dry-cleaning solvents and that regulations prohibit installation of a water supply well into a contaminated aquifer.

If you would like to see an example of this notice, please go to <u>https://deq.nc.gov/about/divisions/waste-management/superfund-section/dry-cleaning-solvent-cleanup-act-program</u> and click "DSCA Public Notices and Announcements" on the right-hand side of the web page. Open the "Risk Management Plan" for the Former Lucas Cleaners and DC410049 site and see Attachment [#]. If the proposed remedy is approved, you will be sent a letter describing your rights to appeal the decision to file such a notice in the chain of title, and providing you the option of filing the notice yourself.

If you have questions, please contact me at scott.stupak@deq.nc.gov or (919) 707-8359.

Sincerely,

Scott Stupak, DSCA Project Manager Division of Waste Management, NCDEQ

Attachments: Summary of the NOI

cc: DSCA Site ID DC410049 File





Date

<property owner> <address> <city, state, zip>

Subj: Dry-Cleaning Solvent Contamination Associated with Former Lucas Cleaners 1101 West Gate City Boulevard, Greensboro, Guilford County, NC DSCA Site ID DC410049

Dear <property owner>:

The Dry-Cleaning Solvent Clean-up Act (DSCA) Program has completed an assessment of the dry-cleaning solvent contamination associated with the Former Lucas Cleaners at 1101 West Gate City Boulevard, Greensboro, North Carolina. The property is currently occupied by the Spartan Village student housing for University of North Carolina at Greensboro (UNCG). That site has been certified into the DSCA Program, and a remedial strategy to address the site contamination has been prepared. A public comment period was held from \_\_\_\_\_\_, during which the community had an opportunity to comment on the proposed remedial strategy. Any comments received were addressed, and the proposed remedial strategy is now approved as final.

You are receiving this letter because your property lies within an area where dry-cleaning solvents have been detected in groundwater. An evaluation of the risks concluded that the contamination poses no unacceptable risks for the current use of your property. The approved remedial strategy provides that a notice will be recorded in the chain of title for your property indicating that groundwater is contaminated with dry-cleaning solvents and that regulations in 15A North Carolina Administrative Code 02C.0107(b)(1) prohibit installation of a water supply well into an aquifer that is contaminated. If you have an existing water supply well, it must be maintained in accordance with 15A North Carolina Administrative Code 02C.0112 whereby it will not be a source or channel of contamination to the water supply or aquifer.

The proposed Notice of Dry-Cleaning Solvent Remediation applicable to your property is attached hereto as Attachment A. You have the option of recording the Notice yourself, however, if you elect not to, the DSCA Program will record the Notice in the chain of title for your property. Should you elect to record the Notice yourself, we will send you detailed



instructions along with the final documents that will need to be presented at the Guilford County Register of Deeds Office for recordation.

If you wish to appeal the decision to file the Notice, you are entitled to a hearing. Your request for a hearing must be in form of a written petition, complying with the requirements of Chapter 150B of the General Statutes of North Carolina. The petition must be filed with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714. The petition must be received and filed by the Office of Administrative Hearings within sixty (60) days of receipt of this letter.

In addition to filing the original written petition with the Office of Administrative Hearings, a copy of this petition must be served on this office as follows:

Mr. Bill Lane, General Counsel Department of Environmental Quality 1601 Mail Service Center Raleigh, North Carolina 27699-1601

Please notify the DSCA Program within sixty (60) days of receipt of this letter if you wish to record the Notice in the chain of title for your property yourself. If no response is received from you within that time, and no appeal is filed, the DSCA Program will proceed with recording the Notice.

If you have questions, please contact me via email at scott.stupak@deq.nc.gov, or by phone at (919) 707-8359 or Delonda Alexander via email at <u>delonda.alexander@deq.nc.gov</u> or by phone at (919) 707-8365.

Sincerely,

Sincerely,

Scott Stupak DSCA Project Manager Division of Waste Management, NCDEQ Delonda Alexander DSCA Remediation Unit Supervisor Division of Waste Management, NCDEQ

Attachments: Proposed Notice of Dry-Cleaning Solvent Remediation

cc: DSCA Site ID DC410049 File





#### <Date>

Mr. Chris Wilson Interim City Manager P.O. Box 3136 Greensboro, NC 27402-3136

Subj: Remediation of Dry-Cleaning Solvent Contamination DSCA Site ID DC410049 Former Lucas Cleaners, 1101 West Gate City Boulevard, Greensboro

Dear Mr. Jaiyeoba,

The Dry-Cleaning Solvent Cleanup Act of 1997 (DSCA), North Carolina General Statutes (N.C.G.S.) Sections 143-215.104A through 143-215.104U, provides for the assessment and remediation of properties that may have been or were contaminated by chlorinated solvents. To satisfy the requirements of N.C.G.S. 143-215.104L, this letter serves as the **Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site** (NOI) approved by the North Carolina Department of Environmental Quality (DEQ).

The NOI must provide, to the extent known, a legal description of the location of the DSCA Site, a map showing the location of the DSCA Site, a description of the contaminants involved and their concentrations in the media of the DSCA Site, a description of the intended future use of the DSCA Site, any proposed investigation and remediation, and a proposed Notice of Dry-Cleaning Solvent Remediation (NDCSR) prepared in accordance with N.C.G.S. Section 143-215.104M. The required components of the NOI are included in the attached Risk Management Plan, and are available during the public comment period on our website at: <a href="https://deq.nc.gov/about/divisions/waste-management/superfund-section/special-remediation-branch/dsca-public-notices-announcements">https://deq.nc.gov/about/divisions/waste-management/superfund-section/special-remediation-branch/dsca-public-notices-announcements</a>

The DSCA Program is providing a copy of the NOI to all local governments having jurisdiction over the DSCA Site. A 30-day public comment period is being held from <date>, until <date>. Written comments may be submitted to DEQ no later than <date>. Written requests for a public meeting may be submitted to DEQ no later than <date>. All such comments and requests should be sent to:

Scott Stupak, DSCA Remediation Unit Division of Waste Management, NCDEQ 1646 Mail Service Center Raleigh, North Carolina 27699-1646



A Summary of the NOI is being published in the Greensboro News & Record, copies are being sent to owners of property within and contiguous with the area of contamination, and a copy of the Summary will be conspicuously posted at the Site during the public comment period.

If you have any questions, please feel free to contact me at (919) 707-8359.

Sincerely,

Scott Stupak, DSCA Project Manager Division of Waste Management, NCDEQ





#### <Date>

Ms. Paula Cox Guilford County Environmental Health Division Director 400 W. Market Street Greensboro, NC 27405

### Subj: Remediation of Dry-Cleaning Solvent Contamination DSCA Site ID DC410049 Former Lucas Cleaners, 1101 West Gate City Boulevard, Greensboro

Dear Ms. Cox:

The Dry-Cleaning Solvent Cleanup Act of 1997 (DSCA), North Carolina General Statutes (N.C.G.S.) Sections 143-215.104A through 143-215.104U, provides for the assessment and remediation of properties that may have been or were contaminated by chlorinated solvents. To satisfy the requirements of N.C.G.S. 143-215.104L, this letter serves as the **Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site** (NOI) approved by the North Carolina Department of Environmental Quality (DEQ).

The NOI must provide, to the extent known, a legal description of the location of the DSCA Site, a map showing the location of the DSCA Site, a description of the contaminants involved and their concentrations in the media of the DSCA Site, a description of the intended future use of the DSCA Site, any proposed investigation and remediation, and a proposed Notice of Dry-Cleaning Solvent Remediation (NDCSR) prepared in accordance with N.C.G.S. Section 143-215.104M. The required components of the NOI are included in the attached Risk Management Plan, and are available during the public comment period on our website at: <a href="https://deq.nc.gov/about/divisions/waste-management/superfund-section/special-remediation-branch/dsca-public-notices-announcements">https://deq.nc.gov/about/divisions/waste-management/superfund-section/special-remediation-branch/dsca-public-notices-announcements</a>

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Sincerely,

Scott Stupak, DSCA Project Manager Division of Waste Management, NCDEQ

