

North Carolina Department of Environmental Quality

Pat McCrory
Governor

Donald R. van der Vaart
Secretary

October 23, 2015

Mr. Nicholas Torrey
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill NC 27516

Re: Chapel Hill Police Department Property
828 Martin Luther King Jr Blvd, Chapel Hill, Orange County, NC
Site ID# NONCD0001486

Dear Mr. Torrey:

Thank you for submitting comments regarding the Town of Chapel Hill Police Department Property Site's Revised Environmental Site Characterization Report, on behalf of the Friends of Bolin Creek. Your concerns have been taken into consideration and the following comments are provided in response to your letter.

Well Placement Concerns

Location of New Wells

We requested that MW-3 and MW-4 be abandoned and replaced because these wells could not produce sufficiently low turbidity samples due to well construction problems. Installation of the new monitoring wells was very difficult because of the steep topography and unconsolidated overburden. The well drillers attempted multiple boreholes in this small area but due to borehole collapse before the well screens and casing could be inserted, the wells were unable to be completed. MW-3a and MW-4a are located hydrologically down gradient of the fill area and will be able to adequately monitor downgradient groundwater quality. In order to better demonstrate this, we have asked the Town to submit a water table elevation contour map with groundwater flow patterns depicted based on the groundwater elevation data that was collected during well installation and sampling. However at this time it is not necessary to add another monitoring well.

Depth of New Wells

One of the problems with the monitoring wells MW-3 and MW-4 was that they were not deep enough to produce enough water to adequately purge and collect a sample. Therefore, the new monitoring wells had to be installed a bit deeper to ensure samples could be collected in compliance with proper sample collection procedures. The new monitoring wells are constructed to collect samples from the unconfined shallow aquifer.

Well Development

Well Development

Your letter stated that you felt the monitoring wells were not properly developed in order to remove residual suspended solids from the well. While we agree with your comment, as long as the consultant is able to get the turbidity down to acceptable levels during sample collection we will accept the sample results.

Low Flow Pump For Sample Collection

Due to the known turbidity problems at the site, the state advised the Town's consultant to use a low flow pump to collect groundwater samples, as recommended in the Standard Field Protocols section of the *Inactive Hazardous Site Program, Guidelines for Assessment and Cleanup*.

Radioactivity Concerns

You requested that all future groundwater monitoring include testing for radium 228/228 and lead 210. In order to be consistent in how all coal ash sites are being monitored, the Department of Environmental Quality has compiled a list of analytes for groundwater at these types of sites. We are directing the Town to use the Department's list.

If you have any questions, please do not hesitate to contact me at (919) 707-8371 or via email at amy.axon@ncdenr.gov.

Sincerely,



Amy Axon, Hydrogeologist
Division of Waste Management, NCDEQ

cc: Curtis Brooks, Town of Chapel Hill
Christopher Burkhardt, Falcon Engineering