



NORTH CAROLINA  
*Environmental Quality*

ROY COOPER  
*Governor*

MICHAEL S. REGAN  
*Secretary*

MICHAEL SCOTT  
*Director*

December 1, 2020

Mr. Barry Siegal  
BSC Holdings, Inc.  
P.O. Box 16168  
High Point, NC 27261

Re: BSC Holdings, Inc. Property  
Guilford College Rd and West Wendover Ave  
Greensboro, Guilford County  
*ID Number Pending*

Dear Mr. Siegal:

After reviewing the information submitted for the subject site (the "Site") by Pilot Geological, PLLC (Pilot) on November 19, 2020, the source of the chloromethane detected at this Site remains unclear. While detections in sample locations GW-3 and GW-4 located along the Gaither Transou property line could be due to contamination at the Gaither Transou site, this contaminant has not previously been detected at the Gaither Transou site. In addition, the highest detection was at location GW-1 which is the farthest away from the Gaither Transou site and this location appears to be on the other side of a surface drainage feature based on the topographic map. The information provided is also not sufficient to demonstrate that this contaminant is naturally occurring. Without further assessment, the source and extent of the chloromethane contamination is unknown and the Inactive Hazardous Sites Branch (IHSB) cannot identify a responsible party.

Regardless of the source of the contamination, because chloromethane has been detected at multiple locations at concentrations exceeding the 15A 2L Groundwater Standard, this property cannot be removed from the IHSB inventory and a closure ("no further action") letter issued as requested. If future assessment should prove that the Gaither Transou site and/or another site is the source of this contamination, this Site would be considered part of the source site and not have a separate listing on the IHSB inventory. This property, however, would not be eligible for a no further action letter until the extent of contamination is defined and all applicable remedial goals are achieved.

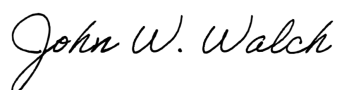


The IHSB has also completed review of the Site Conditions Questionnaire that was submitted and determined that this Site can be cleaned up through the Registered Environmental Consultant (REC) Program without direct oversight by Branch staff. Only the sites with the highest risks receive direct oversight by Branch staff. To conduct an approved cleanup, you must enter into an REC-Administrative Agreement (REC-AA) with the Branch. If you have any questions regarding these procedures or the REC Program, please contact Janet Macdonald at (919) 707-8349 or visit the REC Program website at <http://deq.nc.gov/about/divisions/waste-management/superfund-section/registered-environment-consultant-program>.

You may also perform remedial activities independently and request a no further action review when having met remedial action cleanup standards for unrestricted use. To provide the best opportunity for success, independent cleanups should be performed in accordance with the most recent version of the Branch's *Guidelines for Assessment and Cleanup of Contaminated Sites*. Independent cleanups do not receive oversight and approval as they proceed. Parties conducting cleanups in this manner are also not eligible for the statutory cap of remedial action expenses.

In closing, Pilot's response indicates that it is their understanding that the property is intended to be redeveloped for residential use. As of the date of this correspondence, the assessment and delineation of the contamination at the Site has not been completed. Due to the known presence of contamination at the Site, including but not necessarily limited to chloromethane, all contamination at the Site should be properly and fully assessed prior to redevelopment. Should you attempt to sell or otherwise transfer ownership of the Site, you should disclose all environmental data including documented contamination to any prospective purchasers/transferees. In addition, if you have liability concerns associated with redevelopment, you may want to contact the Division of Waste Management's Brownfields Program to discuss this Site's eligibility for a Brownfields Agreement. If you have additional questions, please contact Ashley Dinkins at the Guilford County Department of Health and Human Services at (336) 641-5557.

Sincerely,



John W. Walch  
Eastern Unit Supervisor  
Inactive Hazardous Sites Branch  
Division of Waste Management

cc: Jason Ricks, Pilot Geological, PLLC, jricks@pilotenviro.com

