



Division of Waste Management

Michael F. Easley, Governor  
William G. Ross Jr., Secretary  
Dexter R. Matthews, Director

24 July 2002

Ms. Sonna M. Loewenthal  
Assistant Town Manager  
Town of Chapel Hill  
306 Columbia Street  
Chapel Hill, NC 27516

RE: University of NC/Old Sanitary Ldfl  
University of NC/Airport Waste Disposal

Dear Ms. Loewenthal:

I am with the North Carolina Department of Environment and Natural Resources in the Division of Waste Management's Inactive Hazardous Sites Program. You recently contacted Eric Rice in our Department's Division of Water Quality regarding hazardous substance disposal sites on University of North Carolina Chapel Hill property. Mr. Rice's Division is working on one of the UNC-Chapel Hill sites we have catalogued. The Division of Waste Management's Hazardous Waste Section is working on another. I believe your inquiry though centered around two other sites on Airport Road. Thus I am writing you to provide a little information on those sites. I have already spoken with Bill Stockard in your office and I believe he may have reviewed our files.

The Inactive Hazardous Sites Program (IHSP) is the state's program for addressing old hazardous substance spills, disposals and contamination. We have an inventory of about 1800 sites across the state. There are five UNC-Chapel Hill sites in that inventory. The last two sites listed below are those for which I believe you received an inquiry.

1 is under the jurisdiction of the Division of Waste Management's Hazardous Waste Section under a RCRA permit:

UNC-Chapel Hill      NCD982093783      488 Estes Drive

1 is under the jurisdiction of the Division of Water Quality's Groundwater Section:

University of NC at Chapel Hill      NCD980515308      Finley Golf Course Rd

1 has been assigned "no further action" status and has no issues remaining:

University of North Carolina      NCD003203213      Venable Hall

2 are still open cases under the Division of Waste Management's Inactive Hazardous Sites Program:

University of NC/Old Sanitary Ldfl      NCD980557615      Airport Rd

Universtiy of NC/Airport Waste Disp      NCD980557623      Airport Rd

The IHSP was established to address the sites determined not to be priorities for the federal Superfund cleanup program. Both of the Airport Road sites have been evaluated and assigned no further actions by US EPA under federal Superfund.

The IHSP is required to prioritize sites based on their threat to human health and the environment. All sites not undergoing voluntary actions or working with another agency on cleanup must be ranked. Except for a large list of old municipal landfills and some new sites, all of the sites have been ranked. The NCD980557623 site is number 216 out of 445 with a score of 38.47 out of 100. The NCD980557615 site is number 222 and has a score of 38.25. With 1 being the highest rank. Unless a party contacts us interested in volunteering to clean up a site, the sites are addressed in order of priority.

In 1996 UNC contacted our office about doing a voluntary remedial action at the Airport Road Sites. At that time we had no staff resources available to provide oversight and approval. Unless a site was a high priority, volunteers were allowed to proceed independently using written agency guidance and seek our approval afterwards. In April of 1997 regulations were established allowing us to privatize our oversight role at lower priority voluntary remedial action sites. Thus in May of 1997 all parties we knew or suspected may be conducting independent actions were sent a letter advising them they needed to complete their independent cleanup by August of 1997 for state review. After that date they would need to conduct cleanup through our new Registered Environmental Consultant voluntary cleanup program. With this program, the volunteer enters into an agreement with the state and hires an approved environmental consultant (an REC) to not only conduct the work, but to certify its regulatory compliance in place of state review. The state audits a portion of the cases to verify compliance.

When UNC received the May 1997 letter they contacted us to indicate their interest in voluntarily conducting assessment and remedial action through the new program. UNC was sent a consent agreement for the sites. UNC requested language be inserted in the agreement that performance of the work was contingent on them having the money to do work. We told them that we could not put that contingency in and that they would have to meet the deadlines required by rule (which are fairly generous but are nevertheless deadlines) if they signed the agreement. They elected not to proceed further I believe since they did not have funds. We told them if they were not in a position to sign the agreement now, when they obtained the funds we could work with them at that time.

Note also in 1997 UNC complied with a recordation order and recorded a Notice of an Inactive Hazardous Sites for the NCD980557623 site at the Orange County Register of Deeds Office. In 1998 UNC complied with a recordation order and recorded a Notice of an Inactive Hazardous Sites for the NCD980557615 site.

Based on a 1996 Geraghty & Miller report prepared for UNC, the NCD980557623 chemical waste disposal has groundwater contamination. The sites's primary groundwater contaminants are benzene, methylene chloride, and chloroform. Other chemicals were detected as

well. The groundwater contaminant plume has migrated from the disposal area toward Crow Branch Creek. Monitoring wells north of Crow Branch Creek did not detect any contamination in three rounds of sampling. This NCD980557615 old sanitary landfill site is close in proximity to the chemical waste site. Groundwater also flows towards Crow Branch Creek. We do not have any additional groundwater data for this site.

Closest private well to the sites was sampled in 1991 and was clean. It is 0.7 mi away from the landfill in a northwest direction.

Surface water samples collected from Crow Branch Creek in 1991 by this Division were clean. During 1995-96 the creek was also sampled by Geraghty & Miller for UNC in five locations on five different dates and in a sixth location on four different dates. During one of the five sample events, low levels of a two contaminants were detected in surface water at the location closest to the old sanitary landfill and a low level of one contaminant was detected in another location. No contaminants were detected during any of the other sample events except the last. In the last round of these sample events diethyl ether was the only contaminant detected. It had not been previously detected and was found in only one of the six locations. The concentration detected is well below our cleanup criteria. No contaminants have ever been detected in the three sample locations furthest down stream. All samples were collected on UNC property.

Our files indicate the NCD980557615 old sanitary landfill site is about 35 acres in size NCD980557615 and operated between 1967-73. The NCD980557623 chemical waste site is roughly 200 ft by 100 ft (1/2 acre) and operated between 1973-79.

To summarize, these two sites are not top priorities for the Inactive Hazardous Sites Program at this time. We would be happy to work with UNC towards a voluntary remedial action if they have sufficient funds to conduct such work. If you have any questions, please contact me at (919) 733-2801 X284.

Sincerely,



Charlotte V. Jesneck, Head  
Inactive Hazardous Sites Branch  
Superfund Section