File 57423
Original I&C
but it was
modified later

200 National Avenue SC Properties, LLC
5696 Alton Road
Miami Beach, Florida 33140

RECEIVED
AUG 2 9 2007
DIVISION OF SITE
ASSESSMENT & REMEDIATION

Ms. Gail Rawls Jeter
South Carolina Department of Health and Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, South Carolina 29201

Re: 200 National Avenue SC Properties, LLC's Information and Certification for a Non-Responsible Party Voluntary Cleanup Contract

Property Location: 200 and 280 National Avenue
Spartanburg, South Carolina

Current Owner: Castlebridge Properties, LLC

Dear Ms. Rawls Jeter:

The purpose of this letter is to provide the South Carolina Department of Health and Environmental Control (the "Department") with certain information and certifications in order for 200 National Avenue SC Properties, LLC, a South Carolina limited liability company ("National Avenue, LLC"), to enter into a Non-Responsible Party Voluntary Cleanup Contract ("NRPVCC") with the Department regarding certain real property containing approximately 21 acres located at 200 and 280 National Avenue in Spartanburg, South Carolina (the "Property"). A legal description of the Property is attached as **Exhibit A** to this letter.

I. Property Background

The Property is currently owned by Castlebridge Properties, LLC ("Castlebridge") and contains two buildings. The building located at 200 National Avenue (the "200 Building") contains approximately 147,000 square feet. Another building located at 280 National Avenue (the "280 Building") contains approximately 152,396 square feet. The 200 Building and 280 Building are presently used by the Goodyear Tire Company ("Goodyear") for the storage and distribution of tires and rubber products. From 1983 to 1985, National Lock Company ("National Lock") used the Property for cabinet and door hardware manufacturing operations. From 1970 to the early 1980s, Butte Knit, Jonathan Logan, and Act III (collectively known as "United Merchants") used the site for textile cut and sew operations. The Property was undeveloped agricultural land prior to 1970.

National Avenue, LLC has entered into a contract with Castlebridge to purchase the Property, conditioned upon: (1) Castlebridge and the Department entering into a Responsible Party Voluntary Cleanup Contract ("RPVCC") and (2) National Avenue, LLC and the Department

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entering into an NRPVCC that affords the protections to both National Avenue, LLC and its lenders provided in the model NRPVCC.

Castlebridge retained Ground Engineering Solutions, Inc. ("Ground Engineering") to perform a Phase I Environmental Site Assessment ("ESA") and a limited Phase II ESA for the Property. A copy of the limited Phase II ESA report dated February 16, 2006, which summarizes a Phase I ESA completed in May 2005, is attached as **Exhibit B**. As indicated in the limited Phase II ESA report, it appears that there is some contamination on the Property. The perception that the Property may have some environmental contamination complicates National Avenue, LLC's decision of whether to purchase the Property. Ground Engineering also prepared a Work Plan dated August 10, 2007, attached as **Exhibit C**, which outlines the parties' proposed assessment activities.

II. Information & Certifications

Below we have set forth the information and certifications required by the Department.

1. This is to certify that National Avenue, LLC's acquisition of the Property will provide benefits to South Carolina, Spartanburg and the Department. Specifically, by entering into an RPVCC and an NRPVCC, Castlebridge and National Avenue, LLC will provide environmental benefits. National Avenue, LLC's further investigation of the areas of environmental concern identified in the Phase II ESA report will provide the Department with information to determine whether there has been any adverse impact on the environment caused by prior manufacturing operations on the Property. If the Department determines that there have been environmental impacts significant enough to require additional investigations or remediation, then Castlebridge will undertake the necessary response action, bearing the financial burden and responsibility for investigation and remediation activities not presently being pursued by the Department, thereby benefiting the State, the community and the Department.

In addition to the environmental benefits that will result from the purchase and response action, National Avenue, LLC will maintain the buildings on site in good repair and continue to lease the Property to Goodyear, a leading tire manufacturer and employer of Spartanburg residents. In the future, National Avenue, LLC may expand the use of the Property and renovate and/or expand the buildings, potentially creating new jobs for residents in Spartanburg, in turn increasing revenues for the state.

2. This is to certify that National Avenue, LLC is not a responsible party, or a parent, successor or subsidiary of a responsible party for the Property, as the term "Responsible Party" is defined under Section 107(a) of the Comprehensive Environmental Response Compensation and Liability Act, as amended (42 U.S.C. Section 9607(a)) and South Carolina Code Section 44-56-720(8), because National Avenue, LLC is not related in any way to the entities that have previously owned or leased the Property.

Castlebridge is the current owner of the Property and would be considered the Responsible Party for any contamination that may exist on the Property for purposes of Section 107(a) of the Comprehensive Environmental Response Compensation and Liability Act, as amended (42 U.S.C. Section 9607(a)) and South Carolina Code Section 44-56-720(8). National Avenue, LLC assumes that the Department will conduct its own inquiry into Castlebridge's financial condition and

determine that it is financially viable to perform the necessary response actions at the Property pursuant to its obligations under an RPVCC.

The Property was owned and operated by National Lock from 1983 until 1985. Based on our research, it appears that the company no longer exists.

The Property was owned and operated by United Merchants from the 1970s to the early 1980s. All of the information regarding contact information that we have for United Merchants was obtained from the Internet because we do not have any personal knowledge of that company or its appropriate contact person. The address and telephone number for the headquarter offices of United Merchants, now primarily a manufacturer of costume jewelry, are: 1650 Palisade Avenue, Teaneck, NJ 07666, (201) 837-1700.

National Avenue, LLC does not have any knowledge of the identity of previous owners of the Property other than National Lock and United Merchants. Because the Property was in agricultural use prior to the time United Merchants operated at the site, we assume that the Department will not require further information on any other prior owners. If the Department needs that information, we will be in a position to provide it once we complete our title examination for the Property.

3. This is to certify that National Avenue, LLC will be using the Property as an investment property. As set forth in Paragraph 1, National Avenue, LLC intends to maintain the buildings on site in good repair and continue to lease the Property to Goodyear; thus it is not anticipated that any hazardous substances will be generated. If National Avenue, LLC expands the current operations or conducts other operations on the Property in the future, it is anticipated that some use of hazardous substances may occur. However, any hazardous substances and wastes will be handled and disposed of in accordance with the applicable statutes and regulations. Accordingly, the future use of the Property will not aggravate or contribute to contamination that may exist on the Property or interfere with any future response action by Castlebridge, nor will it pose health risks to either the community or those persons likely to be present at or near the Site.

4. This is to certify that because National Avenue, LLC is a newly created entity, formed in 2007, it has no previous financial reports to offer to the Department. Pursuant to the purchase agreement for the Property, Castlebridge is funding all investigation and remediation activities ordered by the Department, including reimbursing National Avenue, LLC for its initial investigation expenses, thus we believe it is unnecessary to demonstrate that National Avenue, LLC has the financial resources to satisfy its obligations under the NRPVCC.

5. This is to certify that National Avenue, LLC intends to maintain the buildings on site in good repair and continue to lease the Property to Goodyear. If National Avenue, LLC expands the current operations or conducts other operations on the Property in the future, National Avenue, LLC does not anticipate that such future use will aggravate or contribute to contamination that may exist on the Property or interfere with any future response action by Castlebridge, nor will it pose health risks to either the community or those persons likely to be present at or near the Site.

6. This is to certify that National Avenue, LLC will perform the initial investigation of soils and groundwater under the NRPVCC with the Department. Further investigations and any remediation of existing contamination on or under the Property will be performed by Castlebridge

under the RPVCC with the Department. A copy of the limited Phase II ESA report dated February 16, 2006, which summarizes a Phase I ESA completed in May 2005, is attached as **Exhibit B**. Additionally, a copy of the proposed Work Plan dated August 10, 2007 is attached as **Exhibit C**.

7. A legal description of the Property is attached as **Exhibit A**.

8. The official name, address, and contact person for the Company are as follows:

200 National Avenue SC Properties, LLC
5696 Alton Road
Miami Beach, FL 33140
Contact: Yves R. Barroukh

Telephone: (786) 486-1818
Facsimile: (395) 868-1049
E-mail: yves@dsli.com

If the Department needs any additional information in order for the Company to enter into an NRPVCC, please contact either me at (786) 486-1818 or Rita Barker with Wyche Burgess Freeman & Parham, P.A. at (864) 242-8235.

Company:

200 National Avenue SC Properties, LLC, a South Carolina limited liability company

By: _____
Yves R. Barroukh (printed name)

Title: Manager

Cc: Rita B. Barker, Esq.
Jim Warren, Esq.
Bob deHoll, Esq.
Craig Eady

EXHIBIT A

LEGAL DESCRIPTION OF PROPERTY

All that certain piece, parcel or tract of land, lying and being in the County of Spartanburg, State of South Carolina and shown and designated as Lot No. 1, containing 8.997 acres on a survey made for National Drive, LLC by Neil R. Phillips dated February 22, 2000 and recorded in Plat Book 147, Page 112 in the Office of the Register of Deeds for Spartanburg County, South Carolina. For a more particular description reference is hereby made to the said plat and the record thereof.

All that certain piece, parcel or tract of land, lying and being in the County of Spartanburg, State of South Carolina and shown and designated as Lot No. 6, containing 12.140 acres on a survey made for National Drive, LLC by Neil R. Phillips dated February 22, 2000 and recorded in Plat Book 147, Page 112 in the Office of the Register of Deeds for Spartanburg County, South Carolina. For a more particular description reference is hereby made to the said plat and the record thereof.

This being the same property conveyed to Castlebridge Properties LLC by deed of National Drive, LLC dated June 15, 2004, recorded June 15, 2004 in the Register of Deed Office for Spartanburg County, South Carolina in Deed Book 80-N, Page 956.

EXHIBIT B

Ground
ENGINEERING SOLUTIONS, INC.

February 16, 2006

Ms. Jan T. Cooke, Hydrogeologist
Groundwater Quality Section
Water Monitoring, Assessment and Protection Division
SC DHEC
2600 Bull Street
Columbia, South Carolina 29201

SUBJECT: Report of Findings
Goodyear Tire Company
Castlebridge Properties, LLC Property
200 & 280 National Avenue
Spartanburg, Spartanburg County, South Carolina
Site ID # 03066

Dear Ms. Cooke:

Ground Engineering Solutions (GES) has completed a Phase II Environmental Site Assessment (Phase II) of the Castlebridge Properties, LLC property located at 200 and 280 National Avenue in Spartanburg, Spartanburg County, South Carolina (Exhibit 1). This report presents a summary of the work performed during the Phase II and results of the laboratory analysis per monitoring well approval #2472. The investigation work is based on the results of a May 2005 Phase I Environmental Site Assessment Report of the property conducted by GES.

BACKGROUND

The subject property contains two buildings utilized for the storage and distribution of tires and rubber products (Goodyear Tire Company, 1989 to present). Previous usages of the property included a textile cut and sew operation (Butte Knit, Jonathan Logan, Act III (United Merchants), 1970 to 1980's) and a cabinet and door hardware manufacturer (National Lock Company, 1983-1985). According to knowledgeable persons, no hazardous chemicals were used, stored or disposed during the operation of the former textile cut and sew operation (Butte Knit) and the current tire and rubber storage and distribution operation (Goodyear Tire Company). However, a metal plating operation was utilized by National Lock in the 200 National Avenue building (Exhibit 2). Etched and stained concrete was observed in the former metal plating room. Plating fluids were stored in a 6,000-gallon above ground storage tank located within a secondary containment structure on the northwest side of the building. Waste water from the plating operation was contained in two plastic tanks housed in two in-ground basins within the building. Treated waste water was discharged to a secondary above ground plastic settling tank located on the northwest corner of the property. Afterwards, the treated water was discharged to the sanitary sewer via an in-ground concrete weir.

3534 RUTHERFORD ROAD • TAYLORS, SC 29687 • 864-292-2901 • FAX 864-292-6361

As a result of the environmental concerns identified for the property, a Phase II environmental assessment was requested by a potential buyer of the property, National Avenue Properties, LLC to assess potential impacts to the soil and groundwater associated with these areas of concern.

SOIL AND GROUNDWATER QUALITY SAMPLING ACTIVITIES

GES personnel conducted soil and groundwater quality sampling activities at the site on October 21, 2005. Probe Technology, Inc. (SC certification #B01432) of Concord, NC installed the soil borings and temporary wells with a truck-mounted GeoProbe® 5410 direct-push rig. Three soil borings/temporary wells (GP-1 – GP-3) were installed. The soil borings were situated in the vicinity and downgradient of the interior waste water treatment tank and plating operations (GP-1), the plating fluids above ground storage tanks (GP-2) and the in-ground concrete weir (GP-3). The locations of the soil borings/temporary wells are illustrated in Exhibit 2.

To determine the underlying soil conditions and depth to water, continuous soil cores (macro cores).were collected in GP-1 to 24 feet. The soil samples were described as predominantly micaceous silty sand, indicative of saprolitic soils in the Piedmont of South Carolina. No odors, discolored or stained soils were observed. Groundwater was indicated in GP-1 at a depth of 17.3 feet below ground surface. A soil sample was collected at the water table interface from GP-1 at a depth interval of 16 to 17 feet for laboratory analysis. The GeoProbe sampler was extended to determine the depth to bedrock as determined by probe refusal. A transition zone was encountered at 36 feet and bedrock conditions were determined at 39 feet below ground surface.

Following soil sample collection, a GeoProbe® groundwater sampling tool was installed in each soil boring for purposes of collecting a groundwater quality sample. A groundwater sample was collected from GP-1 at the water table interface at a depth interval of 20 to 24 feet and at the depth of bedrock at an interval of 35 to 39 feet. A groundwater sample was collected from GP-2 at the water table interface at a depth interval of 24 to 28 feet. Several attempts were made to collect a groundwater sample at the GP-3 location; however, no groundwater was detected prior to intercepting the bedrock at depths ranging from 7 to 9 feet below the ground surface. Following groundwater sample collection, the borings were abandoned with a tremied bentonite cement grout from the bottom of the boring to the land surface.

RESULTS OF LABORATORY ANALYSIS

The soil and groundwater samples were submitted to Shealy Environmental Services, Inc. (SC DHEC Certification #32010) for laboratory analysis. The soil sample was analyzed for volatile organic compounds (VOCs) by US EPA method 8260B, following method preparation 5035, and the RCRA eight metals plus zinc. The groundwater samples were analyzed for VOCs by US EPA method 8260B. The detected analytical data is summarized in Table 1. The laboratory analytical reports and chain of custody are included as an attachment.

Analytical results for the GP-1 soil sample indicate a detection of several volatile organic compounds including cis-1,2-dichloroethene (19 µg/kg), trichloroethene (30 µg/kg) and tetrachloroethene (140 µg/kg). No other volatile organic compounds were detected above the method detection limit. Several metal constituents were detected including barium (310 mg/kg), chromium (72 mg/kg), lead (34 mg/kg) and zinc (86 mg/kg). No other metal constituents were detected above the method detection limit in GP-1.

Groundwater analytical results indicated several volatile organic compounds were detected in the samples from GP-1 and GP-2. Analytical results from the GP-1 shallow groundwater sample (20 to 24 feet) indicate cis-1,2-dichloroethene (66 µg/L), tetrachloroethene (340 µg/L) and trichloroethene (98 µg/L). Tetrachloroethene was detected in the deeper GP-1 groundwater sample (35 to 39 feet) at a concentration of 250 µg/L. Tetrachloroethene was also detected in the GP-2 sample at a concentration of 180 µg/L.

TABLE 1
GROUNDWATER AND SOIL ANALYTICAL RESULTS
DETECTED ORGANIC AND INORGANIC CONSTITUENTS
CASTLEBRIDGE PROPERTIES LLC PROPERTY
SPARTANBURG, SOUTH CAROLINA

	DETECTED ORGANIC/INORGANIC CONSTITUENTS						
SAMPLE (DEPTH, FT)	CIS 1,2 DCE	PCE	TCE	BARIUM	CHROMIUM	LEAD	ZINC
SOIL (mg/kg)							
GP-1 (16-17')	0.019	0.14	0.03	310	72	34	86
PRG[1]	150	1.3	0.11	67,000	450	800	100,000
GROUNDWATER (µg/L)							
GP-1 (20-24')	66	340	98	NA	NA	NA	NA
GP-1 (35-39')	<5.0	250	<5.0	NA	NA	NA	NA
GP-2 (24-28')	<5.0	180	<5.0	NA	NA	NA	NA
MCL[2]	70	5	5				

1. PRG = PRELIMINARY REMEDIATION GOALS IN AN INDUSTRIAL SETTING. US EPA REGION 9, 10/2004
2. MCL = MAXIMUM CONTAMINANT LEVELS.

Bold values indicate detected concentrations above the MCL.

SUMMARY

Soil and groundwater sampling was conducted on the Castlebridge Properties LLC property to evaluate the soil and groundwater quality associated with the previous and current use of the property. Analytical results indicate impacted soils from compounds indicative of chlorinated solvents in the vicinity of the discontinued interior waste water treatment tank and plating operations (GP-1). The detected soil concentrations are below the US EPA Region 9 preliminary remediation goals for industrial settings as recognized by SC DHEC.

The groundwater analytical results indicate impacts to the groundwater with compounds indicative of chlorinated solvents in the vicinity of the interior waste water treatment tank and plating operations and the plating fluids above ground storage tanks. The detected VOCs in GP-1 and GP-2 exceed the established US EPA Maximum Contaminant Levels (MCLs) for cis-1,2-dichloroethene (70 µg/L), tetrachloroethene (5 µg/L) and trichloroethene (5 µg/L). No groundwater was determined above the bedrock, as indicated by probe refusal, in the downgradient location adjacent to the concrete weir.

The waste water treatment system is no longer in operation (discontinued) and the current uses of the property included the warehousing and distribution of tires and rubber products.

If you have any questions and (or) comments regarding this report, or if I can be of further assistance, please contact me at (864) 292-2901.

Sincerely,

GROUND ENGINEERING SOLUTIONS, INC.

Craig D. Eady, P.G. #1099
Senior Geologist

C: Mr. Randall Bentley, National Ave. Properties, LLC, 101 A West Court Street, Greenville, SC 29601
Mr. Tom Morgan, Castlebridge Properties, LLC, PO Box 128, Hazelwood, NC 28738

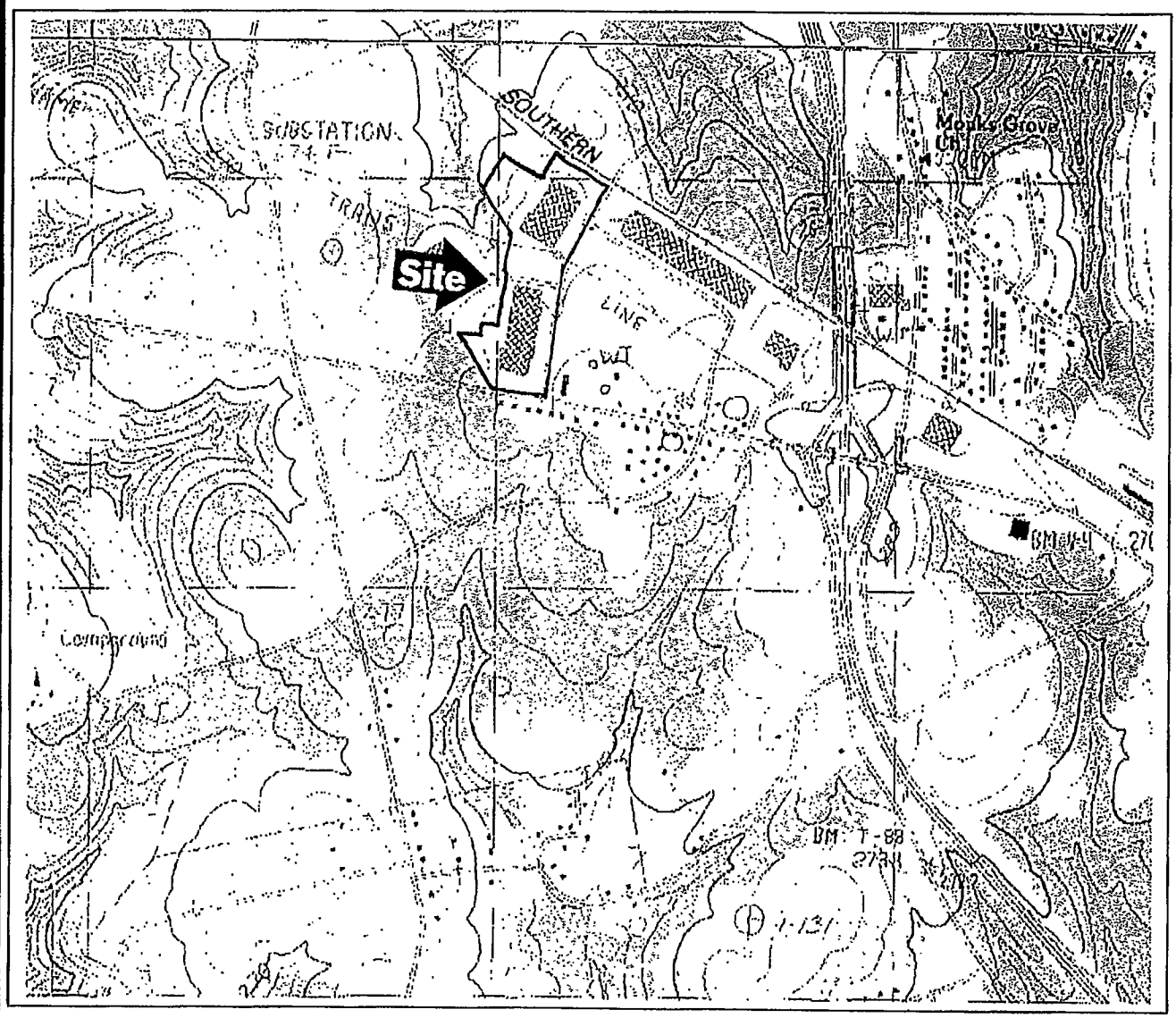
Enclosure(s): Attachments

FIGURES

Ground
ENGINEERING SOLUTIONS, INC.

SITE LOCATION MAP
Castlebridge Properties LLC Property
200 & 280 National Avenue
Spartanburg, South Carolina
GES Project No: EFA 051.12
Scale: 1" = 1320'↑

SOURCE:
USGS W of Southern Shops, SC
www.terraserver-usa.com
Date: July 1, 1983
EXHIBIT 1

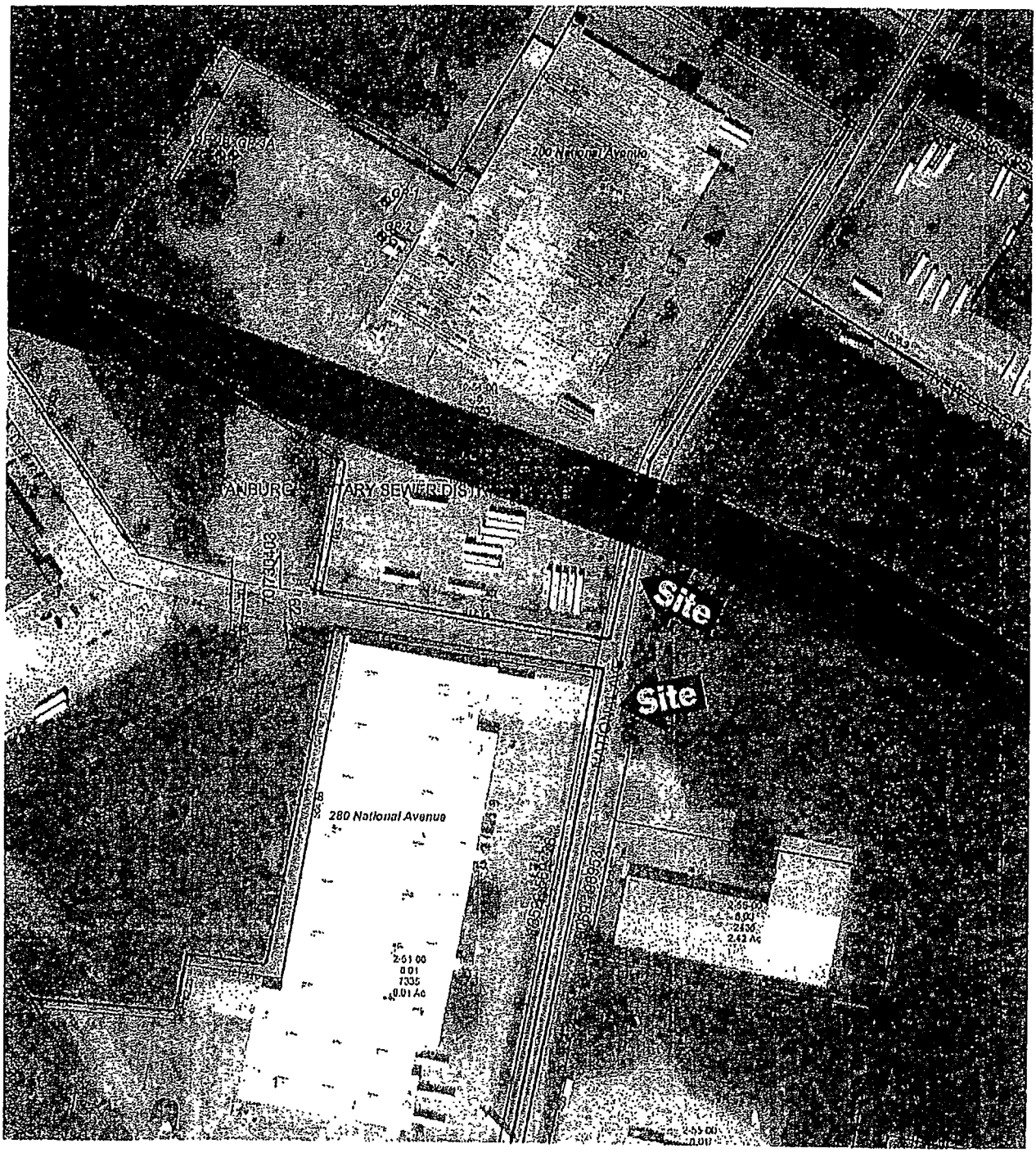


Ground
ENGINEERING SOLUTIONS, INC.

GEOPROBE SAMPLE LOCATIONS
Castlebridge Properties LLC Property
200 & 280 National Avenue
Spartanburg, South Carolina
GES Project No: EFA 051.12
Scale: 1" = 200'↑

SOURCE:
Spartanburg Tax Assessor
2004 Aerial Photograph

EXHIBIT 2



LABORATORY REPORT

SHEALY ENVIRONMENTAL SERVICES, INC.

Report of Analysis

Ground Engineering Solutions, Inc.
3534 Rutherford Road
Taylors, SC 29687
Attention: Craig Eady

Project Name: **Goodyear Tire**

Project Number: **EFA 051.12**

Lot Number: **GJ24017**

Date Completed: **10/27/2005**

Kelly M. Maberry
Project Manager

The following non-paginated documents are considered part of this report: Chain of Custody Record and Sample Receipt Checklist.

SHEALY ENVIRONMENTAL SERVICES, INC.

SC DHEC No: 32010 NELAC No: E87653 NC DEHNR No: 329

Case Narrative
Ground Engineering Solutions, Inc.
Lot Number: GJ24017

This Report of Analysis contains the analytical result(s) for the sample(s) listed on the Sample Summary following this Case Narrative. The sample receiving date is documented in the header information associated with each sample.

Sample receipt, sample analysis, and data review have been performed in accordance with the most current approved NELAC standards, the Shealy Environmental Services, Inc. ("Shealy") Quality Assurance Management Plan (QAMP), standard operating procedures (SOPs), and Shealy policies. Any exceptions to the NELAC standards, the QAMP, SOPs or policies are qualified on the results page or discussed below.

If you have any questions regarding this report please contact the Shealy Project Manager listed on the cover page.

SHEALY ENVIRONMENTAL SERVICES, INC.

Sample Summary
Ground Engineering Solutions, Inc.
Lot Number: GJ24017

Sample Number	Sample ID	Matrix	Date Sampled
001	GP-1: 20-24'	Aqueous	10/24/2005 1000
002	GP-1: 35-39'	Aqueous	10/24/2005 1020
003	GP-2: 24-28'	Aqueous	10/24/2005 1045
004	GP-1: 16-17'	Solid	10/24/2005 1015

(4 samples)

SHEALY ENVIRONMENTAL SERVICES, INC.

Executive Summary
Ground Engineering Solutions, Inc.
Lot Number: GJ24017

Sample	Sample ID	Matrix	Parameter	Method	Result	Q	Units	Page
001	GP-1: 20-24'	Aqueous	cis-1,2-Dichloroethene	8260B	66		ug/L	5
001	GP-1: 20-24'	Aqueous	Tetrachloroethene	8260B	340		ug/L	5
001	GP-1: 20-24'	Aqueous	Trichloroethene	8260B	98		ug/L	5
002	GP-1: 35-39'	Aqueous	Tetrachloroethene	8260B	250		ug/L	7
003	GP-2: 24-28'	Aqueous	Tetrachloroethene	8260B	180		ug/L	9
004	GP-1: 16-17'	Solid	cis-1,2-Dichloroethene	8260B	19		ug/kg	11
004	GP-1: 16-17'	Solid	Tetrachloroethene	8260B	140		ug/kg	11
004	GP-1: 16-17'	Solid	Trichloroethene	8260B	30		ug/kg	11
004	GP-1: 16-17'	Solid	Barium	6010B	310		mg/kg	13
004	GP-1: 16-17'	Solid	Chromium	6010B	72		mg/kg	13
004	GP-1: 16-17'	Solid	Lead	6010B	34		mg/kg	13
004	GP-1: 16-17'	Solid	Zinc	6010B	86		mg/kg	13

(12 detections)

Volatile Organic Compounds by GC/MS

Client: Ground Engineering Solutions, Inc.
Description: GP-1: 20-24'
Date Sampled: 10/24/2005 1000
Date Received: 10/24/2005

Laboratory ID: GJ24017-001
Matrix: Aqueous

Run	Prep Method	Analytical Method	Dilution	Analysis Date	Analyst	Prep Date	Batch
1	5030B	8260B	5	10/26/2005 1249	RED		32318

Parameter	CAS Number	Analytical Method	Result	Q	PQL	Units	Run
Acetone	67-64-1	8260B	ND		100	ug/L	1
Benzene	71-43-2	8260B	ND		25	ug/L	1
Bromodichloromethane	75-27-4	8260B	ND		25	ug/L	1
Bromoform	75-25-2	8260B	ND		25	ug/L	1
Bromomethane (Methyl bromide)	74-83-9	8260B	ND		25	ug/L	1
2-Butanone (MEK)	78-93-3	8260B	ND		50	ug/L	1
Carbon disulfide	75-15-0	8260B	ND		25	ug/L	1
Carbon tetrachloride	56-23-5	8260B	ND		25	ug/L	1
Chlorobenzene	108-90-7	8260B	ND		25	ug/L	1
Chloroethane	75-00-3	8260B	ND		25	ug/L	1
Chloroform	67-66-3	8260B	ND		25	ug/L	1
Chloromethane (Methyl chloride)	74-87-3	8260B	ND		25	ug/L	1
1,2 Dibromo-3-chloropropane (DBCP)	96-12-8	8260B	ND		25	ug/L	1
Dibromochloromethane	124-48-1	8260B	ND		25	ug/L	1
1,2 Dibromoethane (EDB)	106-93-4	8260B	ND		25	ug/L	1
1,2 Dichlorobenzene	95-50-1	8260B	ND		25	ug/L	1
1,3 Dichlorobenzene	541-73-1	8260B	ND		25	ug/L	1
1,4 Dichlorobenzene	106-46-7	8260B	ND		25	ug/L	1
1,1 Dichloroethane	75-34-3	8260B	ND		25	ug/L	1
1,2 Dichloroethane	107-06-2	8260B	ND		25	ug/L	1
1,1 Dichloroethene	75-35-4	8260B	ND		25	ug/L	1
cis 1,2-Dichloroethene	156-59-2	8260B	66		25	ug/L	1
trans-1,2-Dichloroethene	156-60-5	8260B	ND		25	ug/L	1
1,2 Dichloropropane	78-87-5	8260B	ND		25	ug/L	1
cis-1,3-Dichloropropene	10061-01-5	8260B	ND		25	ug/L	1
trans-1,3-Dichloropropene	10061-02-6	8260B	ND		25	ug/L	1
Ethylbenzene	100-41-4	8260B	ND		25	ug/L	1
2-Hexanone	591-78-6	8260B	ND		50	ug/L	1
Methyl tertiary butyl ether (MTBE)	1634-04-4	8260B	ND		25	ug/L	1
4-Methyl-2-pentanone	108-10-1	8260B	ND		50	ug/L	1
Methylene chloride	75-09-2	8260B	ND		25	ug/L	1
Naphthalene	91-20-3	8260B	ND		25	ug/L	1
Styrene	100-42-5	8260B	ND		25	ug/L	1
1,1,2,2-Tetrachloroethane	79-34-5	8260B	ND		25	ug/L	1
Tetrachloroethene	127-18-4	8260B	340		25	ug/L	1
Toluene	108-88-3	8260B	ND		25	ug/L	1
1,1,1-Trichloroethane	71-55-6	8260B	ND		25	ug/L	1
1,1,2-Trichloroethane	79-00-5	8260B	ND		25	ug/L	1
Trichloroethene	79-01-6	8260B	98		25	ug/L	1
Vinyl chloride	75-01-4	8260B	ND		10	ug/L	1
Xylenes (total)	1330-20-7	8260B	ND		25	ug/L	1

PQL = Practical quantitation limit
ND= Not detected at or above the PQL
Where applicable, all soil sample analysis are reported on a dry weight basis unless flagged with a "W"

B = Detected in the method blank
J = Estimated result less than the PQL

E = Quantitation of compound exceeded the calibration range
P = The RPD between two GC columns exceeds 40%
N = Recovery is out of criteria

Volatile Organic Compounds by GC/MS

Client: Ground Engineering Solutions, Inc.
Description: GP-1: 20-24'
Date Sampled: 10/24/2005 1000
Date Received: 10/24/2005

Laboratory ID: GJ24017-001
Matrix: Aqueous

Surrogate	Q	Run 1 % Recovery	Acceptance Limits
1,2-Dichloroethane-d4		100	52-138
Bromofluorobenzene		97	70-147
Toluene-d8		96	76-125

PQL = Practical quantitation limit
ND = Not detected at or above the PQL
Where applicable, all soil sample analysis are reported on a dry weight basis unless flagged with a "W"

B = Detected in the method blank
J = Estimated result less than the PQL

E = Quantitation of compound exceeded the calibration range
P = The RPD between two GC columns exceeds 40%
N = Recovery is out of criteria

Volatile Organic Compounds by GC/MS

Client: Ground Engineering Solutions, Inc.
Description: GP-1: 35-39'
Date Sampled: 10/24/2005 1020
Date Received: 10/24/2005

Laboratory ID: GJ24017-002
Matrix: Aqueous

Run	Prep Method	Analytical Method	Dilution	Analysis Date	Analyst	Prep Date	Batch
1	5030B	8260B	1	10/26/2005 1157	RED		32318

Parameter	CAS Number	Analytical Method	Result	Q	PQL	Units	Run
Acetone	67-64-1	8260B	ND		20	ug/L	1
Benzene	71-43-2	8260B	ND		5.0	ug/L	1
Bromodichloromethane	75-27-4	8260B	ND		5.0	ug/L	1
Bromoform	75-25-2	8260B	ND		5.0	ug/L	1
Bromomethane (Methyl bromide)	74-83-9	8260B	ND		5.0	ug/L	1
2-Butanone (MEK)	78-93-3	8260B	ND		10	ug/L	1
Carbon disulfide	75-15-0	8260B	ND		5.0	ug/L	1
Carbon tetrachloride	56-23-5	8260B	ND		5.0	ug/L	1
Chlorobenzene	108-90-7	8260B	ND		5.0	ug/L	1
Chloroethane	75-00-3	8260B	ND		5.0	ug/L	1
Chloroform	67-66-3	8260B	ND		5.0	ug/L	1
Chloromethane (Methyl chloride)	74-87-3	8260B	ND		5.0	ug/L	1
1,2-Dibromo-3-chloropropane (DBCP)	96-12-8	8260B	ND		5.0	ug/L	1
Dibromochloromethane	124-48-1	8260B	ND		5.0	ug/L	1
1,2-Dibromoethane (EDB)	106-93-4	8260B	ND		5.0	ug/L	1
1,2-Dichlorobenzene	95-50-1	8260B	ND		5.0	ug/L	1
1,3-Dichlorobenzene	541-73-1	8260B	ND		5.0	ug/L	1
1,4-Dichlorobenzene	106-46-7	8260B	ND		5.0	ug/L	1
1,1-Dichloroethane	75-34-3	8260B	ND		5.0	ug/L	1
1,2-Dichloroethane	107-06-2	8260B	ND		5.0	ug/L	1
1,1-Dichloroethene	75-35-4	8260B	ND		5.0	ug/L	1
cis-1,2-Dichloroethene	156-59-2	8260B	ND		5.0	ug/L	1
trans-1,2-Dichloroethene	156-60-5	8260B	ND		5.0	ug/L	1
1,2-Dichloropropane	78-87-5	8260B	ND		5.0	ug/L	1
cis-1,3-Dichloropropene	10061-01-5	8260B	ND		5.0	ug/L	1
trans-1,3-Dichloropropene	10061-02-6	8260B	ND		5.0	ug/L	1
Ethylbenzene	100-41-4	8260B	ND		5.0	ug/L	1
2-Hexanone	591-78-6	8260B	ND		10	ug/L	1
Methyl tertiary butyl ether (MTBE)	1634-04-4	8260B	ND		5.0	ug/L	1
4-Methyl-2-pentanone	108-10-1	8260B	ND		10	ug/L	1
Methylene chloride	75-09-2	8260B	ND		5.0	ug/L	1
Naphthalene	91-20-3	8260B	ND		5.0	ug/L	1
Styrene	100-42-5	8260B	ND		5.0	ug/L	1
1,1,2,2-Tetrachloroethane	79-34-5	8260B	ND		5.0	ug/L	1
Tetrachloroethene	127-18-4	8260B	250		5.0	ug/L	1
Toluene	108-88-3	8260B	ND		5.0	ug/L	1
1,1,1-Trichloroethane	71-55-6	8260B	ND		5.0	ug/L	1
1,1,2-Trichloroethane	79-00-5	8260B	ND		5.0	ug/L	1
Trichloroethene	79-01-6	8260B	ND		5.0	ug/L	1
Vinyl chloride	75-01-4	8260B	ND		2.0	ug/L	1
Xylenes (total)	1330-20-7	8260B	ND		5.0	ug/L	1

PQL = Practical quantitation limit
ND = Not detected at or above the PQL
Where applicable, all soil sample analysis are reported on a dry weight basis unless flagged with a "W"
B = Detected in the method blank
J = Estimated result less than the PQL
E = Quantitation of compound exceeded the calibration range
P = The RPD between two GC columns exceeds 40%
N = Recovery is out of criteria

Volatile Organic Compounds by GC/MS

Client: Ground Engineering Solutions, Inc.	Laboratory ID: GJ24017-002
Description: GP-1: 35-39'	Matrix: Aqueous
Date Sampled: 10/24/2005 1020	
Date Received: 10/24/2005	

Surrogate	Q	Run 1 % Recovery	Acceptance Limits
1,2-Dichloroethane-d4		101	52-138
Bromofluorobenzene		96	70-147
Toluene-d8		98	76-125

PQL = Practical quantitation limit
ND = Not detected at or above the PQL
Where applicable, all soil sample analysis are reported on a dry weight basis unless flagged with a "W"

B = Detected in the method blank
J = Estimated result less than the PQL

E = Quantitation of compound exceeded the calibration range
P = The RPD between two GC columns exceeds 40%
N = Recovery is out of criteria

Volatile Organic Compounds by GC/MS

Client: Ground Engineering Solutions, Inc.
Description: GP-2: 24-28'
Date Sampled: 10/24/2005 1045
Date Received: 10/24/2005

Laboratory ID: GJ24017-003
Matrix: Aqueous

Run	Prep Method	Analytical Method	Dilution	Analysis Date	Analyst	Prep Date	Batch
1	5030B	8260B	1	10/26/2005 1220	RED		32318

Parameter	CAS Number	Analytical Method	Result	Q	PQL	Units	Run
Acetone	67-64-1	8260B	ND		20	ug/L	1
Benzene	71-43-2	8260B	ND		5.0	ug/L	1
Bromodichloromethane	75-27-4	8260B	ND		5.0	ug/L	1
Bromoform	75-25-2	8260B	ND		5.0	ug/L	1
Bromomethane (Methyl bromide)	74-83-9	8260B	ND		5.0	ug/L	1
2-Butanone (MEK)	78-93-3	8260B	ND		10	ug/L	1
Carbon disulfide	75-15-0	8260B	ND		5.0	ug/L	1
Carbon tetrachloride	56-23-5	8260B	ND		5.0	ug/L	1
Chlorobenzene	108-90-7	8260B	ND		5.0	ug/L	1
Chloroethane	75-00-3	8260B	ND		5.0	ug/L	1
Chloroform	67-66-3	8260B	ND		5.0	ug/L	1
Chloromethane (Methyl chloride)	74-87-3	8260B	ND		5.0	ug/L	1
1,2-Dibromo-3-chloropropane (DBCP)	96-12-8	8260B	ND		5.0	ug/L	1
Dibromochloromethane	124-48-1	8260B	ND		5.0	ug/L	1
1,2-Dibromoethane (EDB)	106-93-4	8260B	ND		5.0	ug/L	1
1,2-Dichlorobenzene	95-50-1	8260B	ND		5.0	ug/L	1
1,3-Dichlorobenzene	541-73-1	8260B	ND		5.0	ug/L	1
1,4-Dichlorobenzene	106-46-7	8260B	ND		5.0	ug/L	1
1,1-Dichloroethane	75-34-3	8260B	ND		5.0	ug/L	1
1,2-Dichloroethane	107-06-2	8260B	ND		5.0	ug/L	1
1,1-Dichloroethene	75-35-4	8260B	ND		5.0	ug/L	1
cis-1,2-Dichloroethene	156-59-2	8260B	ND		5.0	ug/L	1
trans-1,2-Dichloroethene	156-60-5	8260B	ND		5.0	ug/L	1
1,2-Dichloropropane	78-87-5	8260B	ND		5.0	ug/L	1
cis-1,3-Dichloropropene	10061-01-5	8260B	ND		5.0	ug/L	1
trans-1,3-Dichloropropene	10061-02-6	8260B	ND		5.0	ug/L	1
Ethylbenzene	100-41-4	8260B	ND		5.0	ug/L	1
2-Hexanone	591-78-6	8260B	ND		10	ug/L	1
Methyl tertiary butyl ether (MTBE)	1634-04-4	8260B	ND		5.0	ug/L	1
4-Methyl-2-pentanone	108-10-1	8260B	ND		10	ug/L	1
Methylene chloride	75-09-2	8260B	ND		5.0	ug/L	1
Naphthalene	91-20-3	8260B	ND		5.0	ug/L	1
Styrene	100-42-5	8260B	ND		5.0	ug/L	1
1,1,2,2-Tetrachloroethane	79-34-5	8260B	ND		5.0	ug/L	1
Tetrachloroethene	127-18-4	8260B	180		5.0	ug/L	1
Toluene	108-88-3	8260B	ND		5.0	ug/L	1
1,1,1-Trichloroethane	71-55-6	8260B	ND		5.0	ug/L	1
1,1,2-Trichloroethane	79-00-5	8260B	ND		5.0	ug/L	1
Trichloroethene	79-01-6	8260B	ND		5.0	ug/L	1
Vinyl chloride	75-01-4	8260B	ND		2.0	ug/L	1
Xylenes (total)	1330-20-7	8260B	ND		5.0	ug/L	1

PQL = Practical quantitation limit
ND = Not detected at or above the PQL
Where applicable, all soil sample analysis are reported on a dry weight basis unless flagged with a "W"

B = Detected in the method blank
J = Estimated result less than the PQL

E = Quantitation of compound exceeded the calibration range
P = The RPD between two GC columns exceeds 40%
N = Recovery is out of criteria

Volatile Organic Compounds by GC/MS

Client: Ground Engineering Solutions, Inc.
Description: GP-2: 24-28'
Date Sampled: 10/24/2005 1045
Date Received: 10/24/2005

Laboratory ID: GJ24017-003
Matrix: Aqueous

Surrogate	Q	Run 1 % Recovery	Acceptance Limits
1,2-Dichloroethane-d4		101	52-138
Bromofluorobenzene		96	70-147
Toluene-d8		97	76-125

PQL = Practical quantitation limit
ND = Not detected at or above the PQL
Where applicable, all soil sample analysis are reported on a dry weight basis unless flagged with a "W"

B = Detected in the method blank
J = Estimated result less than the PQL

E = Quantitation of compound exceeded the calibration range
P = The RPD between two GC columns exceeds 40%
N = Recovery is out of criteria

Volatile Organic Compounds by GC/MS

Client: Ground Engineering Solutions, Inc.	Laboratory ID: GJ24017-004
Description: GP-1: 16-17'	Matrix: Solid
Date Sampled: 10/24/2005 1015	% Solids: 68.9 10/25/2005 1903
Date Received: 10/24/2005	

Run	Prep Method	Analytical Method	Dilution	Analysis Date	Analyst	Prep Date	Batch
1	5035	8260B	1	10/25/2005 1209	RED		32257

Parameter	CAS Number	Analytical Method	Result	Q	PQL	Units	Run
Acetone	67-64-1	8260B	ND		23	ug/kg	1
Benzene	71-43-2	8260B	ND		5.6	ug/kg	1
Bromodichloromethane	75-27-4	8260B	ND		5.6	ug/kg	1
Bromoform	75-25-2	8260B	ND		5.6	ug/kg	1
Bromomethane (Methyl bromide)	74-83-9	8260B	ND		5.6	ug/kg	1
2-Butanone (MEK)	78-93-3	8260B	ND		11	ug/kg	1
Carbon disulfide	75-15-0	8260B	ND		5.6	ug/kg	1
Carbon tetrachloride	56-23-5	8260B	ND		5.6	ug/kg	1
Chlorobenzene	108-90-7	8260B	ND		5.6	ug/kg	1
Chloroethane	75-00-3	8260B	ND		5.6	ug/kg	1
Chloroform	67-66-3	8260B	ND		5.6	ug/kg	1
Chloromethane (Methyl chloride)	74-87-3	8260B	ND		5.6	ug/kg	1
1,2-Dibromo-3-chloropropane (DBCP)	96-12-8	8260B	ND		5.6	ug/kg	1
Dibromochloromethane	124-48-1	8260B	ND		5.6	ug/kg	1
1,2-Dibromoethane (EDB)	106-93-4	8260B	ND		5.6	ug/kg	1
1,2-Dichlorobenzene	95-50-1	8260B	ND		5.6	ug/kg	1
1,3-Dichlorobenzene	541-73-1	8260B	ND		5.6	ug/kg	1
1,4-Dichlorobenzene	106-46-7	8260B	ND		5.6	ug/kg	1
1,1-Dichloroethane	75-34-3	8260B	ND		5.6	ug/kg	1
1,2-Dichloroethane	107-06-2	8260B	ND		5.6	ug/kg	1
1,1-Dichloroethene	75-35-4	8260B	ND		5.6	ug/kg	1
cis-1,2-Dichloroethene	156-59-2	8260B	19		5.6	ug/kg	1
trans-1,2-Dichloroethene	156-60-5	8260B	ND		5.6	ug/kg	1
1,2-Dichloropropane	78-87-5	8260B	ND		5.6	ug/kg	1
cis-1,3-Dichloropropene	10061-01-5	8260B	ND		5.6	ug/kg	1
trans-1,3-Dichloropropene	10061-02-6	8260B	ND		5.6	ug/kg	1
Ethylbenzene	100-41-4	8260B	ND		5.6	ug/kg	1
2-Hexanone	591-78-6	8260B	ND		11	ug/kg	1
Methyl tertiary butyl ether (MTBE)	1634-04-4	8260B	ND		5.6	ug/kg	1
4-Methyl-2-pentanone	108-10-1	8260B	ND		11	ug/kg	1
Methylene chloride	75-09-2	8260B	ND		5.6	ug/kg	1
Naphthalene	91-20-3	8260B	ND		5.6	ug/kg	1
Styrene	100-42-5	8260B	ND		5.6	ug/kg	1
1,1,2,2-Tetrachloroethane	79-34-5	8260B	ND		5.6	ug/kg	1
Tetrachloroethene	127-18-4	8260B	140		5.6	ug/kg	1
Toluene	108-88-3	8260B	ND		5.6	ug/kg	1
1,1,1-Trichloroethane	71-55-6	8260B	ND		5.6	ug/kg	1
1,1,2-Trichloroethane	79-00-5	8260B	ND		5.6	ug/kg	1
Trichloroethene	79-01-6	8260B	30		5.6	ug/kg	1
Vinyl chloride	75-01-4	8260B	ND		5.6	ug/kg	1
Xylenes (total)	1330-20-7	8260B	ND		5.6	ug/kg	1

PQL = Practical quantitation limit
ND = Not detected at or above the PQL
Where applicable, all soil sample analysis are reported on a dry weight basis unless flagged with a "W"
B = Detected in the method blank
J = Estimated result less than the PQL
E = Quantitation of compound exceeded the calibration range
P = The RPD between two GC columns exceeds 40%
N = Recovery is out of criteria

Volatile Organic Compounds by GC/MS

Client: Ground Engineering Solutions, Inc.	Laboratory ID: GJ24017-004
Description: GP-1: 16-17'	Matrix: Solid
Date Sampled: 10/24/2005 1015	% Solids: 68.9 10/25/2005 1903
Date Received: 10/24/2005	

Surrogate	Q	Run 1 % Recovery	Acceptance Limits
1,2-Dichloroethane-d4		121	53-142
Bromofluorobenzene		121	47-138
Toluene-d8		117	68-124

PQL = Practical quantitation limit
ND = Not detected at or above the PQL
Where applicable, all soil sample analysis are reported on a dry weight basis unless flagged with a "W"

B = Detected in the method blank
J = Estimated result less than the PQL

E = Quantitation of compound exceeded the calibration range
P = The RPD between two GC columns exceeds 40%
N = Recovery is out of criteria

Metals

Client: Ground Engineering Solutions, Inc.
Description: GP-1: 16-17'
Date Sampled: 10/24/2005 1015
Date Received: 10/24/2005

Laboratory ID: GJ24017-004
Matrix: Solid
% Solids: 68.9 10/25/2005 1903

Run	Prep Method	Analytical Method	Dilution	Analysis Date	Analyst	Prep Date	Batch
1		7471A	1	10/26/2005 1351	VBS	10/26/2005 1100	32263
1	3050B	6010B	5	10/26/2005 1254	MNM	10/25/2005 1026	32237

Parameter	CAS Number	Analytical Method	Result	Q	PQL	Units	Run
Arsenic	7440-38-2	6010B	ND		1.8	mg/kg	1
Barium	7440-39-3	6010B	310		9.4	mg/kg	1
Cadmium	7440-43-9	6010B	ND		0.72	mg/kg	1
Chromium	7440-47-3	6010B	72		1.8	mg/kg	1
Lead	7439-92-1	6010B	34		1.8	mg/kg	1
Mercury	7439-97-6	7471A	ND		0.12	mg/kg	1
Selenium	7782-49-2	6010B	ND		1.8	mg/kg	1
Silver	7440-22-4	6010B	ND		1.8	mg/kg	1
Zinc	7440-66-6	6010B	86		18	mg/kg	1

PQL = Practical quantitation limit
ND = Not detected at or above the PQL
Where applicable, all soil sample analysis are reported on a dry weight basis unless flagged with a "W"

B = Detected in the method blank
J = Estimated result less than the PQL

E = Quantitation of compound exceeded the calibration range
P = The RPD between two GC columns exceeds 40%
N = Recovery is out of criteria

SHEALY **Chain of Custody Record**

SHEALY ENVIRONMENTAL SERVICES, INC.
106 Vantage Point Drive
Cayce, South Carolina 29033
Telephone No. (803) 791-9700 Fax No. (803) 791-9111

Number 51172

Client: GROUND ENGINEERING	Report to Contact: CRAIG EADY	Telephone No. / Fax No. / Email: 832-2871
Address: 3534 RUTHERFORD ROAD	Sampler's Signature: Craig Eady	Waybill No.
City: TAYLORS State: SC Zip Code: 29687	Printed Name: CRAIG EADY	Quote No.
Project Name: GOODYEAR TIRE		Page ___ of ___
Project No.: EFA 05112	P.O. No.	Lab No.: [illegible]

Analysis (Attach list if more space is needed)

Sample ID / Description (Containers for each sample may be combined on one line)	Date	Time	Grab / Composite	Matrix: Aqueous	Matrix: Solid	Matrix: Non-Aqueous	Containers: Unpres.	H2SO4	HNO3	HCl	NaOH	Na2S2O3	TCLP VOC	RCRA 8 TCLP
GP-1: 20-24'	12/21/05	1000	G	X						3			X	
GP-1: 35-39'	"	1020		X						3			X	
GP-2: 24-28'	"	1045		X						3			X	
GP-1: 16-17'	"	1015			X		1					1	X	X

Possible Hazard Identification: ☒ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison ☐ Unknown

Sample Disposal: ☐ Return to Client ☒ Disposal by Lab

Note: All samples are retained for six weeks from receipt unless other arrangements are made.

Turn Around Time Required (Prior lab approval required for expedited TAT): ☐ Standard ☒ Rush (Specify) 5-DAY TURN

QC Requirements (Specify)

	Date	Time		Date	Time
1. Relinquished by: Craig Eady	12/21/05	1100	1. Received by:	12/21/05	1100
2. Relinquished by:	12-21-05	1505	2. Received by:		
3. Relinquished by:			3. Laboratory received by:	12-22-05	1315

Comments:

LAB USE ONLY: Received on Ice (Circle) [✓ Yes] No Ice Pack — Receipt Temp. 1.7 °C

DISTRIBUTION: WHITE & YELLOW-Return to laboratory with Sample(s); PINK-Field/Client Copy

Document Number: [illegible] Effective Date: [illegible]

EXHIBIT C

WORK PLAN
VOLUNTARY CLEANUP CONTRACTS

CASTLEBRIDGE PROPERTIES, LLC
and
200 NATIONAL AVENUE SC PROPERTIES, LLC

200 AND 280 NATIONAL AVENUE
SPARTANBURG, SOUTH CAROLINA

Prepared for:

CASTLEBRIDGE PROPERTIES, LLC
Hazelwood, North Carolina

and

200 NATIONAL AVENUE SC PROPERTIES, LLC
Miami Beach, Florida

Prepared by:

Ground
A Terracon Company
Taylors, SC 29687

GES-Terracon Project No. 86077044
August 10, 2007

August 10, 2007

Mr. Lucas Berresford
Bureau of Land and Waste Management
SC DHEC
2600 Bull Street
Columbia, South Carolina 29201

RE: ***Work Plan***
Voluntary Cleanup Contracts
Castlebridge Properties, LLC and 20 0 National Avenue SC Properties, LLC
200 and 280 National Avenue
Spartanburg, South Carolina
GES-Terracon Project No. 86077044

Dear Mr. Berresford:

Ground Engineering Solutions, Inc., a Terracon company (GES-Terracon) is pleased to submit this Remedial Investigation (RI) Work Plan for assessment activities outlined in the referenced contract. Five copies of this Work Plan and the site specific Health and Safety Plan are enclosed for your review. Castlebridge Properties has entered a purchase and sale agreement for the properties and it is contemplated that the property will be conveyed to a limited liability company known as 200 National Avenue SC Properties, LLC ("200 National"). It is anticipated that 200 National, as the prospective buyer, will enter into a Non-Responsible Party Voluntary Cleanup Contract with the Department. It is the intention of both Castlebridge Properties and 200 National that the response action under the Non-Responsible Party Voluntary Cleanup Contract will only consist of the submission of this work plan, the performance of the initial phase of the Remedial Investigation described in this work plan and the submission of a report on the initial investigations. Once the report is submitted by 200 National to the Department, then Castlebridge Properties would then be responsible for any additional investigations or analyses that might be required to complete the RI, the conduct of the Baseline Risk Assessment and for the performance of a Feasibility Study and Corrective Action Plan if needed. Once the NRPVCC has been executed by both the Department and 200 National, it may be necessary to amend the Responsible Party Voluntary Cleanup Contract between Castlebridge Properties and the Department to reflect the split of the scope of work on this property. Ms. Rita Bolt Barker is an attorney with the law firm of Wyche Burgess Freeman & Parham, P.A. and she and her partners will be representing 200 National in negotiating the Non- Responsible Party Voluntary Cleanup Contract.

If you have any questions regarding this Work Plan, or if you need additional information, please contact us. I am assuming that with the submission of this Work Plan that we can now arrange for a site visit and meeting to discuss the Work Plan and whether any changes need to be made. Please give me a call so that we can schedule a date and time for the site visit. If you have any questions regarding either the Responsible Party VCC or the Non-Responsible Party VCC, then I would suggest that you contact Bob deHoll, who is the attorney for Castlebridge Properties, or Rita Barker on the Non-Responsible Party VCC. Bob deHoll's telephone number is (864) 242-6440 and Rita Barker's telephone number is (864)242-8235.

Sincerely,

Ground Engineering Solutions/Terracon

Craig D. Eady, P.G.
Senior Hydrogeologist
S.C. Registration No. 1099

Charles R. Clymer, Jr., P.G.
Principal Consultant
S.C. Registration No. 236

Attachments

cc: Mr. Thomas R. Morgan / Castlebridge Properties, LLC
Mr. Robert A. deHoll / Leatherwood, Walker, Todd and Mann, P.C.
Ms. Rita Bolt Barker / Wyche Burgess Freeman & Parham, P.A.
Ms. Gail Jeter / SCDHEC

TABLE OF CONTENTS

1.0 INTRODUCTION

This work plan has been prepared to meet the requirements of the Voluntary Cleanup Contract (VCC) between the South Carolina Department of Health and Environmental Control (SCDHEC) and Castlebridge Properties, LLC (Castlebridge) for assessment of potential contaminants at areas of environmental concern at the Castlebridge property located at 200 and 280 National Avenue in Spartanburg, Spartanburg County, South Carolina. Section 3 of the VCC requests that a Work Plan be submitted to identify methods and schedules for site assessment; contractor and owner contact information; and reporting.

Castlebridge Properties has entered a purchase and sale agreement for the properties and it is contemplated that the property will be conveyed to a limited liability company known as 200 National Avenue SC Properties, LLC ("200 National"). It is anticipated that 200 National, as the prospective buyer, will enter into a Non-Responsible Party Voluntary Cleanup Contract with the Department. It is the intention of both Castlebridge Properties and 200 National that the response action under the Non-Responsible Party Voluntary Cleanup Contract will only consist of the submission of this work plan, the performance of the initial phase of the Remedial Investigation described in this work plan and the submission of a Site Assessment Report on the initial investigations. Once the report is submitted by 200 National to the Department, then Castlebridge Properties would then be responsible for any additional investigations or analyses that might be required to complete the RI, for the conduct of the Baseline Risk Assessment and for the performance of a Feasibility Study and Corrective Action Plan if needed. Once the NRPVCC has been executed by both the Department and 200 National, it may be necessary to amend the Responsible Party Voluntary Cleanup Contract between Castlebridge Properties and the Department to reflect the split of the scope of work on this property.

This Work Plan will include methods to be utilized for the assessment, a schedule of implementation, contact information, and the certified analytical laboratory to be utilized.

2.0 BACKGROUND

The Castlebridge property is located at 200 and 280 National Avenue in Spartanburg, Spartanburg County, South Carolina (Figure 1). The Castlebridge property is developed with two single story warehouse buildings used for the storage and distribution of tire and rubber products (Goodyear Tire Company, 1989 to present). Previous uses of the property include a textile cut and sew operation (Butte Knit, Jonathan Logan, Act III (United Merchants), 1970's to 1980's) and a cabinet and door hardware manufacturer (National Lock Company, 1983-1985). Prior to site development in 1970, the property was undeveloped or used for agricultural purposes since at least 1938.

A Phase I Environmental Site Assessment (ESA) was conducted on the property in May 2005. A recognized environmental condition (REC) was identified with the operation of a former metal plating process by National Lock Company in the 200 National Avenue building. According to the property overseer, plating fluids were stored in a 6,000-gallon above ground storage tank located within a secondary containment structure on the exterior northwest side of the building. No information was available as to the chemical makeup of the plating fluids. Wastewater from the plating operation was contained in two plastic tanks housed in two in-ground basins within the building. Treated wastewater was discharged to a secondary above ground plastic settling tank located on the northwest corner of the property. The treated water was subsequently discharged to the municipal sanitary sewer via an in-ground concrete weir. No information was available regarding the treatment process or the disposal of solids generated from the treatment system.

As a result of the environmental concerns identified with the property, a Phase II ESA soil and groundwater investigation was conducted on the 200 National Avenue parcel in October 2005. Soil and groundwater samples collected in the vicinity and downgradient of the interior wastewater treatment tank and the exterior plating fluids/heating oil above ground storage tanks and analyzed for volatile organic compounds (soil and groundwater) and the RCRA eight metals plus zinc (soil). The analytical results indicated detectable concentrations of chlorinated solvents including cis-1,2-dichloroethene, trichloroethene and tetrachloroethene. It is assumed that the presence of the chlorinated solvents were probably a result of some degreasing operations by one or more of the prior owners of the property. No groundwater was encountered above the bedrock in the vicinity of the concrete weir.

3.0 FACILITY DESCRIPTION

The property is composed of two parcels: 200 National Avenue (12.4 acres, Tax Map # 2-54-00-008.00) and 280 National Avenue (9.01 acres, Tax Map # 2-54-00-008.01). The property is situated in an industrial business park with the vicinity developed with commercial and industrial businesses. The area also includes sparse residential and undeveloped wooded properties. The property is bounded by New Cut Road followed by residential properties to the south; National Avenue followed by commercial warehouses (Southeastern Warehouse and Teco Westinghouse), a trucking terminal (EC Transportation) and vacant wooded land to the east; a manufacturing facility (Pinnacle Coating) and wooded land to the west; and the Norfolk-Southern Railway right-of-way followed by the Landmark Center (office/warehouse operation) to the north.

A site location (USGS topographic) map is included as Figure 1. A site diagram is included as Figure 2 in Appendix A.

3.1 Potential Source Target Areas

The Castlebridge property has been improved with the construction of two single-story warehouses encompassing 152,396 square feet of floor space (280 National Avenue) and 147,000 square feet of floor space (200 National Avenue). The buildings are constructed of concrete block and brick supported with steel column framework and steel truss roof framing on an elevated concrete slab floor. The remaining portions of the property include asphalt pavement for parking and loading docks/trailer storage and landscaped/grassy areas.

The building located at 280 National Avenue was constructed in 1970 and occupies 152,396 square feet of warehousing and office space. The building is leased by Goodyear Tire Company for the storage of rubber products. No manufacturing is conducted in the building. The building maintains an electrical room, a maintenance room, a cold storage room and a former boiler room. No electrical transformers are present in the electrical room. The maintenance room is vacant. The boiler room previously housed a fuel oil fired furnace that was removed in 1990. According to knowledgeable personnel, the boiler utilized a 10,000-gallon fuel oil underground storage tank that was located on the west side of the building. The fuel oil tank was removed from the ground in 1990.

An electrical substation within a fenced enclosure is located on the south end of the building. Two concrete cradles for a former above ground propane tank were observed on the west side of the building. A 300,000 gallon above ground water tank for fire protection is located on the southwest corner of the property. The remaining portions of the property include asphalt pavement for parking and loading docks/trailer storage and landscaped/grassy areas.

The building located at 200 National Avenue was constructed in 1973. Additional improvements were made in 1983 by National Lock. The building occupies 147,000 square feet of warehousing and office space. The building is leased by Goodyear Tire Company for the storage of tires. No manufacturing is conducted in the building. The building utilizes natural gas for heating and a backup generator is present in the electrical room.

According to knowledgeable personnel, the building was previously used by National Lock from 1983 to 1985 for the manufacturing of cabinet and door hardware. The manufacturing process utilized a metal plating process which was located on the northwest portion of the building. Located next to the former plating room are two large in-ground concrete basins that housed plastic tanks for the plating discharge waters. Located in the vicinity of the interior in-ground basins are two exterior above ground storage tanks enclosed with in a brick containment area with a gravel base. The tanks consist of a 10,000-gallon fuel oil tank and a 6,000-gallon plating fluids tank. Wastewater from the plating operation was piped to a neutralization settling tank located at the northwest corner of the property. According to knowledgeable personnel, the settling tank was a partial in-ground plastic tank. The discharge waters from the settling tank were piped to an in-ground concrete weir with discharge to the public sanitary sewer. The

remaining portions of the property include asphalt pavement for parking and loading docks/trailer storage and landscaped/grassy areas.

3.2 Chemicals Used

According to Mr. Maxie Amaker, contract maintenance overseer for Goodyear, no hazardous or non-hazardous chemicals, wastes or petroleum products are used, stored or disposed on the property. However, previously chemicals were used in the metal plating/wastewater treatment processes and chlorinated solvents were probably used for degreasing parts prior to the plating operations. Degreasing operations using chlorinated solvents may have also been used by some of the textile companies that conducted manufacturing operations on the property prior to the time that National Lock occupied the property.

3.3 Past Spills or Releases

Mr. Maxie Amaker indicated that no significant or reportable spills or leaks have occurred at the Goodyear warehouse facilities during Goodyear's and National Lock's occupancy. Mr. Amaker had no knowledge regarding spills or releases before 1983.

3.4 Waste Materials

Solid waste generated at the facility consists of general trash, which is stored in several dumpsters located on the site property that are removed on a periodic basis by Waste Management. Sanitary waste generated at the subject property is discharged to the Spartanburg sanitary sewer system.

3.5 Permits Maintained for the Facility

According to knowledgeable personnel and environmental records database review, no environmental permits are required for the facility.

3.6 Existing Site Conditions

3.6.1 Groundwater Quality

There are no water supply wells or groundwater monitoring wells on site.

3.6.2 Site Geology and Hydrogeology

The Castlebridge property is situated within the Inner Piedmont Physiographic Province of South Carolina. The surficial geology consists of residual soils (saprolite) that have weathered in-place from the underlying bedrock. The bedrock consists of crystalline igneous and metamorphic rocks composed of granite, gneiss and schist rock complexes. During the October 2005 Phase II investigation, continuous soil cores (macro cores) were collected from one boring, GP-1 (located adjacent to and downgradient of the interior waste water treatment tank), to a depth of 24 feet to determine the underlying soil conditions and depth to water.

The soil samples were described as predominantly micaceous silty sand, indicative of saprolitic soils in the Piedmont of South Carolina. The Geoprobe® sampler was extended to determine the depth to bedrock as determined by probe refusal. A transition zone was encountered at 36 feet and bedrock conditions were determined at 39 feet below ground surface.

Ground water within the shallow sediments of the Piedmont province typically occurs under unconfined conditions within the saprolite and underlying fractured bedrock. Ground water flow directions are a subtle reflection of the local topography. Local recharge of the shallow aquifer occurs by the direct infiltration of precipitation. Groundwater was indicated in GP-1 at a depth of 17.3 feet below ground surface. Several attempts were made to collect a groundwater sample at the GP-3 location (near the concrete weir); however, no groundwater was detected prior to intercepting the bedrock at depths ranging from 7 to 9 feet below the ground surface.

3.6.3 Estimated Groundwater Flow Direction

Shallow ground water generally discharges into local streams and rivers. Review of the USGS Wellford, SC topographic map (Figure 1) indicates groundwater is expected to flow to the north-northwest, toward an intermittent tributary to Lawsons Fork Creek.

4.0 CONCEPTUAL SITE MODEL

In order to identify the criteria needed to determine the Applicable or Relevant and Appropriate Requirements (ARARs), it will be necessary to develop a Conceptual Site Model (CSM). The CSM will be used to assess the nature and extent of contamination and to identify potential exposure pathways and potential receptors. Additionally, the CSM will support the location of potential target source areas, and will assist in the identification of potential remedial technologies.

4.1 Potential Source Areas

4.1.1 Former Fuel Oil and Plating Fluids ASTs

Located on the northwest side of the 200 National Avenue building are two empty above ground storage tanks enclosed with in a brick containment area with a gravel base. The tanks consist of a 10,000-gallon fuel oil tank and a 6,000-gallon plating fluids tank. The fuel oil tank was installed in 1973 and provided fuel for a boiler located at the southwest corner of the building. The boiler was taken out of service and removed in 1985 when National Lock vacated the premises. The fuel oil tank was reportedly cleaned out and has been out of service since. The plating fluids AST was installed by National Lock in 1983 for use in the plating operations. The plating fluids AST was taken out of service and cleaned out in 1985 when National Lock vacated the premises.

4.1.2 Former Wastewater Treatment System

Wastewater associated with the metal plating line from National Lock was processed in an in-ground wastewater treatment operation located at the central west end of the 200 National Avenue building. The metal plating operation involved a series of dip tanks. The plating solutions were circulated into several plastic holding tanks housed in two in-ground basins located adjacent to the plating room. The plating solutions were treated and precipitants were allowed to settle out in the holding tanks. The treated waste water was discharged to a settling tank located in the northwest corner of the property and discharged to the local sanitary sewer.

4.2 Potential Exposure Pathways

4.2.1 Potential Pathways for Contaminant Transport

As seen in the Phase II ESA, a release of contaminants from the former facility operations would migrate vertically to the ground water table, determined to exist at a depth of 17 to 18 feet below ground surface (bgs) in the vicinity of the ASTs. Chlorinated solvents have higher specific gravity than groundwater and, therefore, have the capacity to migrate vertically to the deeper, fractured rock aquifer. Contaminant migration could be enhanced by precipitation since the area in the AST containment structure is gravel covered and the area in the vicinity of the ASTs is grass covered. However, there is a low potential for contaminant migration driven by precipitation related to the interior waste water treatment operation. Since this area is covered, there is little to no precipitation that would migrate through the shallow soils (vadose zone) underlying the facility.

4.2.2 Potential Exposure Pathways

Surface Soils - There is a limited exposure to surface soils at the targeted source areas. The source areas are located in paved or covered areas including the warehouse facility floor slab, concrete pavement, and asphalt pavement. The majority of the facility floor slab is six-inches or greater in thickness throughout the warehouse. The only potential exposure to surface soils in the potential target areas is in the grassy areas.

Indoor Air - There is limited exposure for contaminant vapor migration from potentially contaminated site soils to indoor air within the facility. Vapors released from contaminated soils would migrate throughout a subsurface utility trench, and enter an enclosed space through the annular space, voids, or other components of the utility. The only direct soil-to-vapor exposure route is in the grassy areas. These areas are open to the outside, preventing vapor collection in indoor spaces.

Surface Water – There are no surface water basins or compounds on the site. Exposure to surface water is limited to the stormwater drainage system. Exposure points to this system are limited to the drop inlets located throughout the paved areas of the facility. No chemicals

are currently used on the premise; therefore, no exposure is anticipated to workers and the discharge drainage ditch located at the north western portion of the property.

Ground Water – There are no identified exposure routes to groundwater currently existing at the site. Exposure pathways to groundwater may be limited to future site activities such as the installation of an irrigation supply or water supply well. Currently there are no plans for facility improvements that would create an exposure to ground water, with the exception of this investigation.

4.2.3 Potential Receptors

Contaminant transport by ground water can be considered as a potential human and ecological exposure pathway. Based on the estimated groundwater flow direction, a small tributary to Lawsons Fork Creek is the potential receptor for this pathway, located hydraulically down gradient from the potential former source areas. Surface water flow in the tributary is intermittent. Dermal contact or ingestion of ground water surfacing in the tributary is considered a low potential risk pathway.

5.0 SCOPE OF WORK

This scope of work was prepared to determine the source and nature and extent of potentially contaminated areas from the former facility operations. This scope of work was prepared to meet the requirements for a Responsible Party (RP) Voluntary Cleanup Contract (VCC) with Castlebridge Properties for a Remedial Investigation and will be the response action for the Non-Responsible Party VCC if 200 National and the Department enter into such an agreement. The scope of work to be established for the facility includes:

- Development of a Work Plan,
- Health and Safety Plan Preparation,
- Remedial Investigation, and
- Baseline Risk Assessment

This Work Plan was prepared in general accordance with the technical intent of the Environmental Protection Agency (EPA) National Contingency Plan. The RI will be performed to evaluate the potential impact from operations at the Castlebridge property at the reported areas of concern. All soil boring, monitoring well installation, decontamination, and sample collection activities will be conducted in accordance with the EPA Region 4 *Environmental Investigations Standard Operating Procedures and Quality Assurance Manual* (EISOPQAM) guidance document dated November 2001.

The proposed work at the site includes soil and ground water sampling to identify VOCs and metals in the shallow aquifer in the potential source target areas discussed in Section 3.1.

Soil borings and ground water monitoring wells will be installed utilizing Geoprobe® direct push technology (DPT) and conventional monitoring well installation methods to evaluate the soil and ground water quality conditions, and to evaluate the potential risk to human health and the environment. Qualitative and quantitative field data will be collected to delineate the extent of environmental impact and to assist in the selection of soil samples to be submitted for laboratory analysis.

The soil borings and ground water monitoring wells will be installed in the vicinity of the two target areas as 1) two former heating oil and plating fluids aboveground storage tanks (ASTs) and 2) the former wastewater treatment system. Additionally, a background monitoring well will be installed upgradient of the facility operations near the southeast corner of the 200 National Avenue building. The attached site maps (Figure 2 and Figure 3) identify the proposed areas of investigation.

Initially, soil borings/temporary wells will be installed at each of the above referenced locations. Should field screening indicate significant impact to the soils or ground water, additional soil borings/temporary wells will be installed to delineate the horizontal and vertical extent of impact. For the purposes of this work plan, a total of 11 soil borings/temporary wells are proposed for installation (Figure 3).

In addition to this Work Plan, Terracon will provide a project Health and Safety Plan (HASP) under separate cover. The HASP will be prepared in accordance with the requirements set forth in Occupational Safety and Health Administration Regulation 29 CFR 1910.120, where applicable, and applicable state, city, or local safety codes. Specific tasks to be performed are outlined below.

5.1 Soil Characterization

5.1.1 Soil Boring Installation

Eleven continuous-core soil borings will be performed to determine the potential for impact to soil in the vicinity of the targeted areas of concern, with one soil boring installed at a background location, as approved by the SCDHEC. The borings will be installed with a truck or track-mounted Geoprobe® unit and Macrocore sampling equipment. The proposed boring/monitoring well locations are shown on Figures 2 and 3. The borings will extend to the vadose zone/water table interface, and soil cores will be extracted in four-foot acetate sleeves and characterized for lithologic description. Additionally, soils will be collected from the cores at two-foot intervals, and placed in two separate resealable plastic (Ziploc) bags.

One soil sample will be purged of air to eliminate headspace for laboratory analysis, and the other sample will be analyzed for organic vapors (OVA) using a Rae System MiniRae 2000 Photoionization Detector (PID).

5.1.2 Soil Sample Collection

The soil sample with the highest OVA result from each 4-foot core will be analyzed using the Color-Tec field method for tetrachloroethene (PCE). One soil sample per borehole exhibiting the highest concentration using the Color-Tec method will be submitted for laboratory analysis of EPA Target Analyte List and Target Compound List (TAL/TCL) parameters.

If the screening samples indicate no significant impact, then the sample collected from the 0 - 2 foot interval will be submitted for laboratory TAL/TCL analysis. If the screening samples indicate significant impact, then additional soil borings will be installed at locations 25 to 30 feet away from the initial boring, as practical, to identify the horizontal extent of impact to soil. The screening process will be repeated until the extent of impact to soil is identified through the screening process. Once the screening indicates no significant impact, a second soil sample will be submitted for laboratory analysis to confirm the delineation of soil impact.

Soil samples submitted for laboratory analysis will be collected and placed in soil sample kits provided by the analytical laboratory. The soil kit contains a graduated 40ml syringe for soil collection, three 40-ml vials- preserved with methanol (1 vial) and sodium bisulfate (2 vials) and pre-weighed, and a 4 oz amber glass jar. The sample containers, preservative, and holding times for each analyte is included as Table 1, in Appendix B.

The soil samples submitted for laboratory analysis will be placed in a cooler with ice and delivered along with chain of custody documentation to Access Analytical, Inc. in Huntersville, NC for analysis. The surface soil quality data will be compared to the residential and industrial criteria for direct soil exposure, as listed in the USEPA Region 9 Preliminary Remediation Goals (PRGs) table for residential and industrial exposure. The subsurface soil quality data will be compared to the USEPA Region 9 PRG table for residential and industrial exposure, and the Soil Screening Levels (SSLs) Migration to Groundwater values. The facility has been zoned solely for industrial use. Currently there are no plans to redevelop this site or apply for rezoning of the property for residential use.

5.2 Ground Water Characterization

All groundwater monitoring wells will be installed and sampled following the EPA Region 4 *Environmental Investigations Standard Operating Procedures and Quality Assurance Manual* (EISOPQAM) guidance document dated November 2001.

Drilling activities will be supervised by a South Carolina registered Professional Geologist (P.G.). Monitoring well installation approvals will be obtained from the SCDHEC prior to installation, and all Geoprobe® borings and monitoring wells will be installed and abandoned by a South Carolina licensed well driller in accordance with R.61-71, Well Standards and Regulations. Copies of the Water Well Record DHEC 1903 form will be submitted with the Geologist Logs to include the well construction details and well driller name and certification

number.

5.2.1 Ground Water Screening

The soil borings will be extended to the shallow water table as direct-push monitoring wells. A ground water sample will be collected from the vadose zone/water table interface interval (estimated 20 to 25 ft.) and the top of bedrock, as determined by probe refusal (estimated 40 ft.), using a truck or track-mounted Geoprobe® sampling unit and equipment. The Geoprobe® unit will drive 3.25-inch outer diameter rods and a stainless steel drive point to the desired depth. The rods will then be pulled back to open a screen point water sampler and exposing a stainless steel screen, allowing ground water to flow into the sampling rods. Ground water samples will be collected using a ball and check valve assembly with dedicated nylon tubing. Samples will be collected after a sufficient volume of water is purged to reduce the turbidity within the sample.

Groundwater samples will be collected in resealable plastic bags and screened for organic vapors using a Rae System MiniRae 2000 Photoionization Detector Organic Vapor Analyzer (OVA). Groundwater samples will also be placed in unpreserved 40-ml sample vials and analyzed for tetrachloroethene (PCE) and trichloroethene (TCE) using the Color-Tec field screening method. If the screening samples indicate no impact, then monitoring wells will be installed at the proposed screening/m onitoring well locations as shown on Figure 3.

If the screening samples indicate significant impact, then additional soil borings will be installed at locations 25 to 30 feet away from the initial boring, as practical, to identify the horizontal extent of impact to groundwater. If still impacted, additional borings will extend laterally from the source area and this step-out screening process will be repeated until the horizontal extent of impact to groundwater is identified through the screening process. The deeper groundwater samples collected at the bedrock interface will assist in delineating the vertical extent of impact.

Groundwater samples will be collected in laboratory prepared bottles and preserved for laboratory analysis of EPA Target Analyte List and Target Compound List (TAL/TCL) parameters. One groundwater sample will be analyzed from each of the source areas, based on the field screening results. If the screening data indicates impact to groundwater has occurred, a minimum of two groundwater samples and one vertical extent sample will be submitted for TAL/TCL analysis to define the horizontal and vertical extent of impact, respectively.

5.2.2 Shallow Monitoring Well Installation

Eight 2-inch shallow (Type II) ground water monitoring wells will be installed at the reported areas of concern at locations based on the screening results. One well will be installed at a background location (Figures 2 and 3). The monitoring wells will be installed to bracket the

water table, estimated to occur at a depth of 20 to 25 feet below land surface, and the top of bedrock, estimated to occur at a depth of 40 feet below land surface.

The borings for the monitoring wells will be drilled with 3-1/4 -inch hollow stem augers. The wells will be constructed using ten feet of two-inch diameter, 0.010-inch machine slotted PVC well screen with a threaded bottom cap, and 2-inch diameter, threaded, flush-joint PVC riser pipe to the surface. Addition of pre-sieved 20/40 grade silica sand for annular sand pack will be installed around the well screen from the bottom of the boring to approximately two feet above the top of the well screen, followed by two feet of hydrated bentonite pellets above the sand pack and cement/bentonite slurry to the surface. The surface completion will consist of an 8-inch flush-mounted steel manhole cover or a 4-inch square steel standup protective cover set in a 2x2-foot square concrete pad. The monitoring well top of casing (TOC) elevations will be surveyed relative to an arbitrary or actual datum.

5.2.3 Deep Monitoring Well Installation

One telescoping (Type III) monitoring well will be paired with the source area shallow monitoring well in each of the target source areas, if warranted. The boring for the deep well will be drilled with hollow stem augers to approximately 20 feet beneath the shallow well or to the top of crystalline bedrock, whichever is shallower. A six-inch diameter PVC surface casing will be grouted and allowed to set overnight. A four-inch borehole will be drilled inside the outer casing with air rotary or rotary wash methods, approximately 10-15 feet below the outer casing into the fractured bedrock, if necessary. The well will be installed with five feet of two-inch PVC screen and casing, gravel pack, bentonite and grout, and the well will be developed and surface completions installed as specified for the shallow wells.

The monitoring wells will be developed by surging and removing groundwater until fluids appear relatively free of sediment. All investigative derived waste (IDW; i.e. soil cuttings, development purge water) will be temporarily stored on-site in labeled 55-gallon drums pending the results of the laboratory analyses. The drum labels will identify the apparent contents of the drum and the initial accumulation date. All investigative derived waste will be properly disposed in accordance with state regulations and upon regulatory approval.

Stabilized ground water levels will be measured with an electric water level meter. The ground water elevations, ground water flow direction, and the hydraulic gradient at the site will be calculated, and a potentiometric map will be prepared to illustrate the ground water flow direction and gradient at the site.

5.2.4 Groundwater Sample Collection

Ground water samples will be collected from all site monitoring wells for laboratory analysis. Prior to groundwater sample collection, each well will be purged with a new dedicated bailer. Each monitoring well will be purged of a minimum of three well casing volumes of

groundwater, until the monitoring well formation fails to recharge, (i.e., well runs dry) or consistent values (i.e., less than 10% variance between consecutive readings) are obtained for pH, temperature and specific conductivity. Additionally, turbidity will be monitored during purging with a calibrated turbidity meter. Purging will be complete when turbidity values are below 10 Nephelometric Turbidity Units (NTUs), if possible.

The monitoring wells will be sampled for EPA Target Analyte List and Target Compound List (TAL/TCL) parameters. The results of the TAL/TCL analysis will provide ground water quality data needed for further assessment or remedial design, if necessary. The ground water concentrations will be compared to the maximum contaminant levels (MCLs) as listed in the National Primary Drinking Water Regulations and the South Carolina R.61.58 State Primary Drinking Water Regulations.

Dissolved oxygen, temperature, and pH will be measured in the field using clean, calibrated field meters. Sample bottles for VOCs will be filled first, followed by bottles for metals, inorganics, and other non-filtered samples.

Sample containers will be supplied by the contract analytical laboratory, Access Analytical, Inc./Gulf Coast Analytical, Inc. The samples will be pre-preserved by the laboratory in accordance with the analytical method to be performed. The laboratory will provide preservation methods for the various analytics. The sample containers, preservatives, and holding times for each analyte are included on Table 1, in Appendix B.

Quality Control samples will be submitted for laboratory analysis to include trip blanks, field blanks and duplicate samples. One preservative field blank, one VOC trip blank, and one Matrix Duplicate will be collected for the ground water sampling event. The quality control samples will be labeled on the sample bottles and Chain of Custody forms as appropriate.

5.2.5 Sediment/Surface Water Sample Collection

The storm water system accepts runoff from the facility roof and paved areas through storm grates located across the facility, and discharges to a drainage ditch at the northwestern portion of the property (Figure 2). Storm grates for this system are located at or near the potential areas of concern throughout the facility. Therefore, the sediments/surface water interface at the system discharge/outfall locations may be potential source areas of contaminants from the manufacturing facility. The proposed sediment sampling locations are shown on Figure 2 and 3.

In order to identify the soil conditions at the location, one sediment sample will be collected at the stormwater discharge area. The sediment sample will be collected at the soil/surface water interface, placed in laboratory prepared containers, and submitted for laboratory analysis for TAL/TCL compounds. The analytical results will be compared to the USEPA Region 9 PRGs

for residential and industrial exposure or the Soil Screening Levels (SSLs) Migration to Groundwater values.

5.3 Baseline Risk Assessment

If chemicals of concern are identified above allowable levels, a Baseline Risk Assessment will be conducted by Castlebridge Properties as part of its obligations under the Responsible Party VCC. This assessment will be performed in general accordance with the EPA Risk Assessment Guidance for Superfund (RAGS), Volume I, or other appropriate method as approved by the SCDHEC. The Baseline Risk Assessment will be performed to define the extent of impact, characterize the toxicity and levels of hazardous substances present, and identify the potential for human and environmental exposure. Ultimately, the Risk Assessment will provide the data necessary to determine whether or not remedial action is necessary and a justification for performing any remedial action that may be required. Applicable or relevant and appropriate requirements (ARARs) as defined by CERCLA will also be reviewed to help determine the need for remedial action.

5.3.1 Ground Water Flow Rate

Three in-situ borehole permeability tests (slug tests) will be performed to evaluate the ground water flow (seepage) velocity in the shallow aquifer. The Bouwer and Rice method will be used to interpret the field data and calculate the hydraulic conductivity of the aquifer unit. A summary of the slug test data methods, results, and the calculated semi-log graphs of draw down versus time will be provided with the assessment report.

5.3.2 Potential Receptor Survey

A potential receptor survey of the site and vicinity will be performed to determine potential receptors of impacted groundwater or soil vapors in the area. A reconnaissance within a ½ mile radius of the property will be completed to document the location of any exposure points such as underground utilities, water-supply wells, streams or other receptors that could potentially be impacted by contaminant plume migration from the site.

5.3.3 LNAPL and DNAPL Evaluation

The areas of concern will be evaluated by field screening and laboratory analysis of soil and groundwater samples. Continuous coring will be performed as described in Section 3.1, and the soil samples will be evaluated for the presence of LNAPL (light non-aqueous phase liquids) and DNAPL (dense non-aqueous phase liquids). Soil samples which exhibit the highest field screening concentrations will be collected in clear sample jars partially filled with water, shaken and allowed to stabilize for visual inspection of LNAPL and DNAPL. Generally, the LNALPL will float on the water surface and the DNAPL will sink below the water column.

LNAPL or DNAPL in ground water will be assessed through visual inspection of the bottom-

loading bailers inspected during sample collection and laboratory data. The monitoring wells which exhibit elevated VOC concentrations from laboratory analytical data will be gauged for the presence of LNAPL and DNAPL using a product/water level meter.

If the laboratory analyses identify VOC concentrations in any of the borings or wells that are indicative of DNAPL, then the possible presence of DNAPL will be calculated using the methods described in *Estimating Potential for Occurrence of DNAPL at Superfund Sites*, U.S. Environmental Protection Agency, 1992, OSWER Publication 9355.4-07FS.

6.0 FEASIBILITY STUDY

Upon completion of the Remedial Investigation, a Feasibility Study (FS) will be performed by Castlebridge Properties. The objective of the FS will be to develop remedial goals; identify, screen and evaluate remedial technologies considered applicable to the site-specific conditions; develop and evaluate appropriate remedial alternatives; and prepare a design for the selected remedial alternatives.

The FS will be prepared in accordance with objectives identified by SCDHEC, GES-Terracon and Castlebridge. The FS will be based on the EPA document *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA* (EPA, 1988a). The basic steps of the FS process and organization of the FS report will be as follows:

- Summarize the results of all remedial investigations;
- Determine the remedial action objectives for impacted soil and ground water;
- Identify, screen, and conduct a detailed analysis of potential remedial technologies based on their effectiveness, implementability, and cost ;
- Conduct a comparative analysis of the remedial alternatives; and
- Recommend the selected alternative based on the comparative analysis.

Once the FS has been prepared, a Corrective Action Plan (CAP)/ Engineering Report will be prepared (if necessary) and submitted for SCDHEC approval. The CAP will be organized to provide a specific plan, design, and schedule for soil and ground water remediation at the site based on the selected remedial alternatives identified in the FS.

7.0 CONTACT INFORMATION

Project contact information for Castlebridge, GES-Terracon, and the analytical laboratory are described below. Section 6 of the VCC also requests that a Safety and Health Plan be

submitted. The Safety and Health Plan is submitted under a separate cover. The contact information is as follows:

A. Owner/RP
Castlebridge Properties, LLC 352 Georgia Avenue Waynesville, North Carolina 28786 Phone: (828) 456-9473 Fax: (828) 456-9016 Contact: Thomas R. Morgan Email: thommorgan@bellsouth.net

B. Prospective Purchaser/NRP
200 National Avenue S C Properties, LLC 5696 Alton Road Miami Beach, Florida 33140 Phone: (786) 486-1818 Contact: Yves Barroukh Email: yves@dsli.com

C. Consulting Firm
Ground Engineering Soluti ons / Terracon Consultants, Inc. 3534 Rutherford Road Taylors, South Carolina 29687 Phone: (864) 292-2901 Fax: (864) 292-6361 Contact: Craig Eady, P.G. Email: cdeady@terracon.com

D. Analytical Laboratory
Access Analytical, Inc. 7478 Carlisle Street Irmo, South Carolina 29603 Phone: (803) 781-4243 Contact: Ashley Amick Email: aamick@accessanalytical.com

7.1 Deliverables

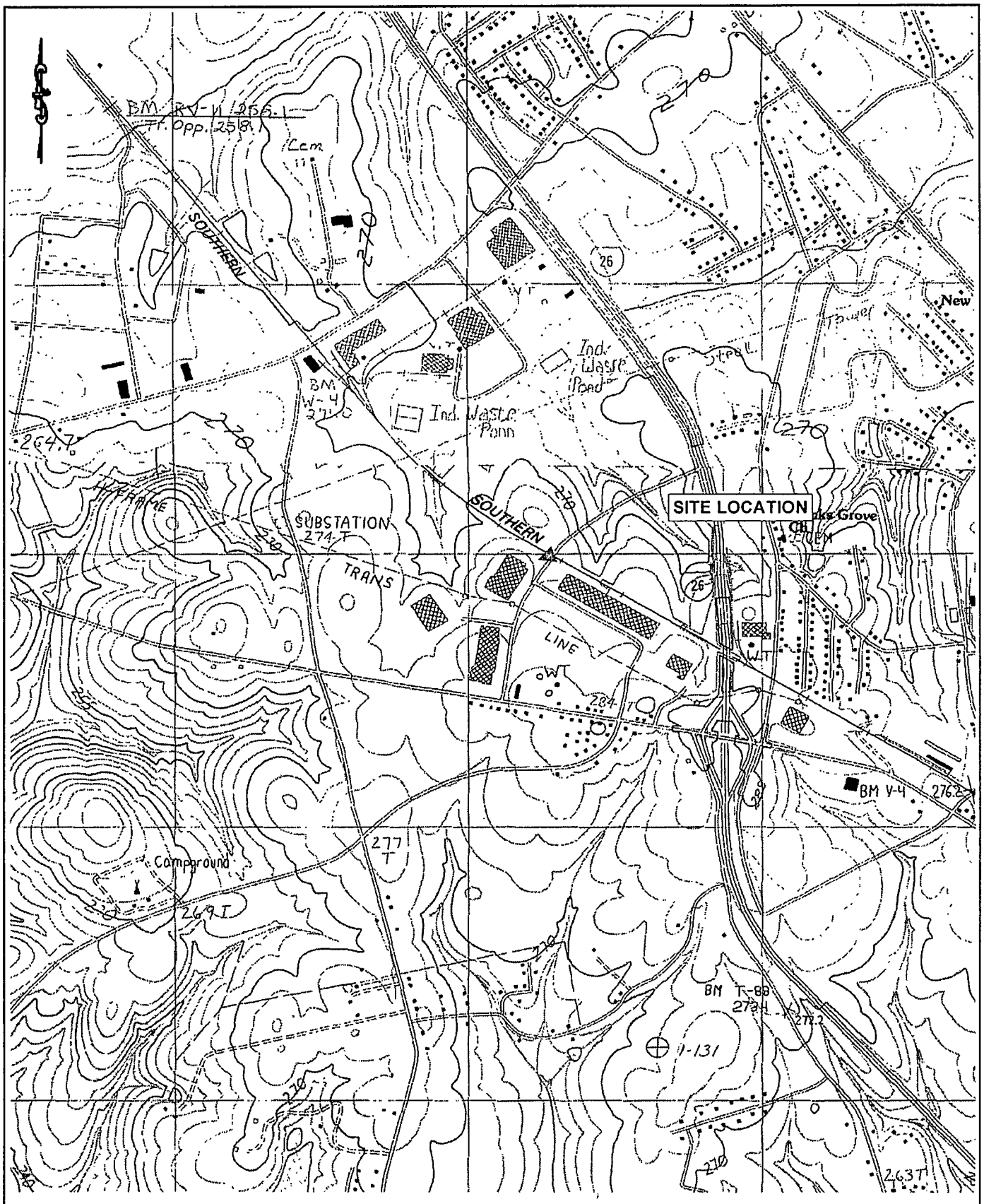
Monthly progress reports will be prepared during the implementation of this work plan to include updates of previous activities and data collected during for the reporting period, and planned activities for the next period. Following completion of the field activities and laboratory testing, GES-Terracon will prepare and submit a Site Assessment Report summarizing the test data to include soil boring and monitoring well locations, well logs, geologic cross-sections, potentiometric and contaminant isoconcentration maps, and field

laboratory results.

7.2 Schedule

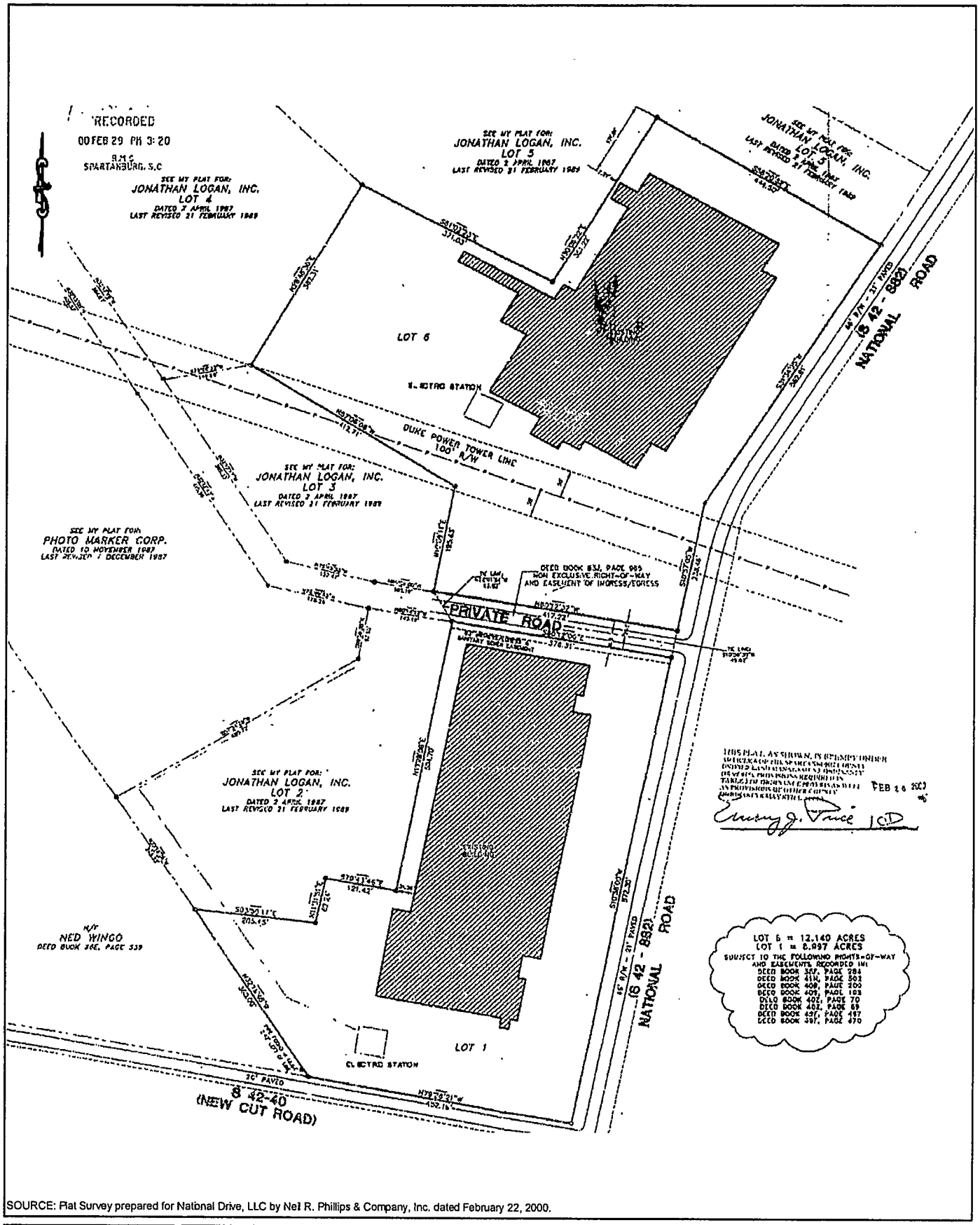
GES-Terracon will mobilize to the site within 2 weeks of Client authorization and SCDHEC Plan approval. The actual commencement of activities may vary depending on when the NRPVCC with 200 National is fully executed which may also affect the schedule shown below. The tentative schedule for completing this project is as follows:

Soil Boring Installation and Ground Water Screening	1 week
Monitoring Well Installation and Sampling	2 week
Laboratory Analysis	2 weeks
RI Report Preparation	2 weeks
Feasibility Study	1 week
Coordination with Client and SCDHEC	1 week
TOTAL	Approximately 9 Weeks



SOURCE: US Geological Survey 7.5-minute Series Topographic Maps; Inman & Wellford, SC Quadrangles (1983).

Project Mngr:	CDE	Project No:	86077044	Ground A Terracon Company 3534 Rutherford Road 864-292-2901 Taylors, South Carolina 29687 864-292-6361	SITE LOCATION MAP Castle Bridge Properties, LLC 200 & 208 National Avenue Spartanburg, South Carolina	Fig No 1
Drawn By:	SKN	Scale:	1" = 2,000'			
Checked By:	CDE	File No:	86077044			
Approved By:	CDE	Date:	7/30/2007			



SOURCE: Plat Survey prepared for National Drive, LLC by Neil R. Phillips & Company, Inc. dated February 22, 2000.

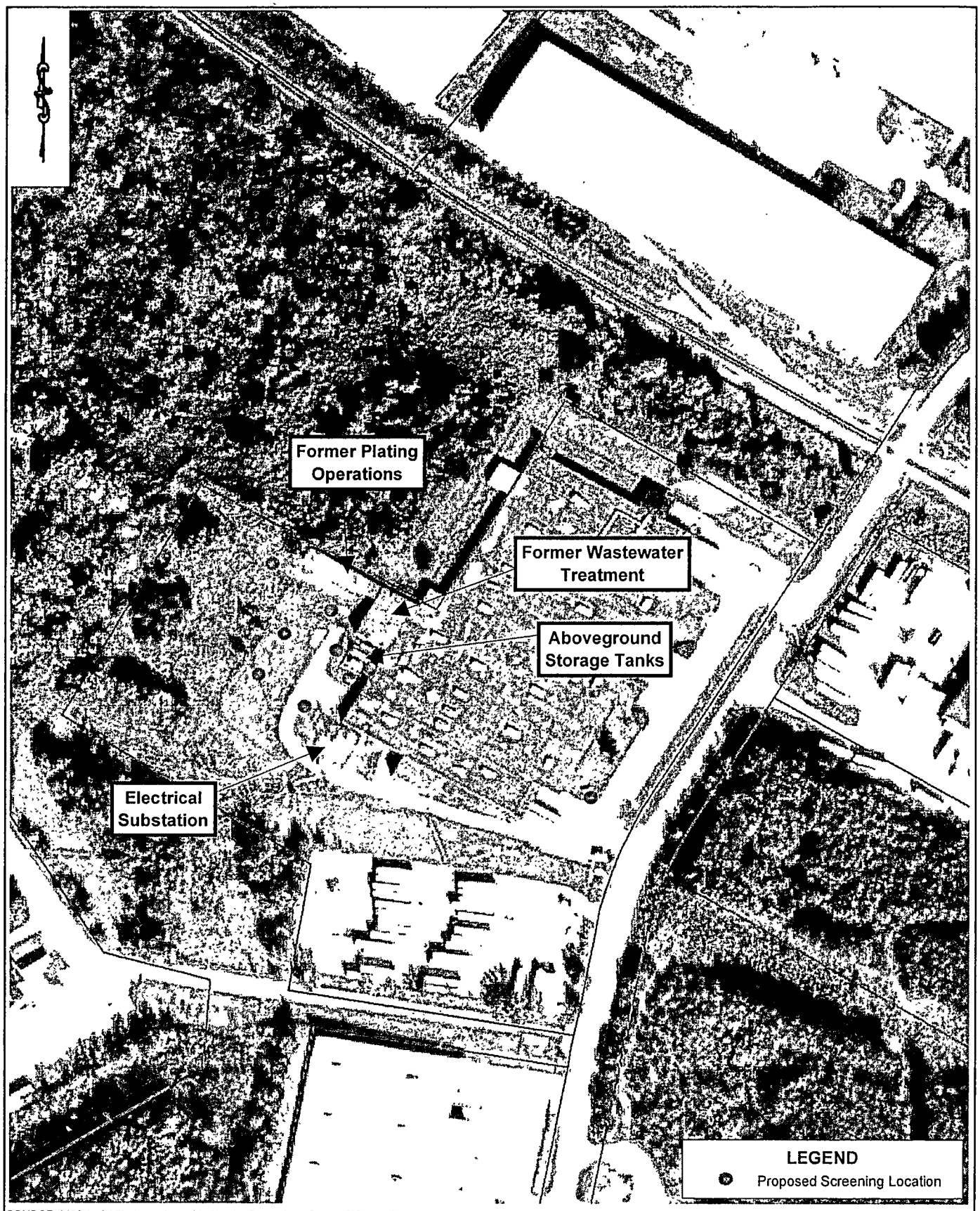
Project Mngr:	CDE	Project No:	86077044
Drawn By:	SKN	Scale:	1" = 215'
Checked By:	CDE	File No:	86077044
Approved By:	CDE	Date:	7/30/2007

Ground
A Terracon Company
3534 Rutherford Road 864-292-2901
Taylors, South Carolina 29687 864-292-6361

SITE DIAGRAM

Castle Bridge Properties, LLC
200 & 208 National Avenue
Spartanburg, South Carolina

Fig No: 2



SOURCE: 2006 Aerial Photograph provided by the Spartanburg County GIS Mapping Department.

Project Mngr:	CDE	Project No:	86077044	Ground A Terracon Company	PROPOSED SCREENING LOCATION MAP	Fig No:
Drawn By:	SKN	Scale:	1" = 175'	3534 Rutherford Road 864-292-2901	Castle Bridge Properties, LLC	3
Checked By:	CDE	File No:	86077044	Taylors, South Carolina 29687 864-292-6361	200 & 208 National Avenue	
Approved By:	CDE	Date:	7/30/2007		Spartanburg, South Carolina	

TABLE 1
SAMPLING AND ANALYTICAL METHODS AND REQUIREMENTS

Castlebridge Properties, LLC Property
200 National Avenue, Spartanburg, South Carolina
VCC CONTRACT NO. 07-5712-RP

Matrix	Parameter	Analytical Method	Sample Container	Preservative	Holding Time
Soil	TCL VOCs	8260B	2 - 40 ml vials 4 oz. glass	Sodium Bisulfate, < 4° C	14 days
	TCL SVOCs	8270	4 oz. widemouth glass	None, < 4° C	14 days
	TAL Metals	6020, 7471	4 oz. Widemouth glass	None, < 4° C	28 days
	TAL Pesticides / PCBs	8081, 8082	4 oz. Widemouth glass	None, < 4° C	14 days
Water	TCL VOCs	8260B	2 - 40 ml vials	HCL, < 4° C	14 days
	TCL SVOCs	8270	1 liter amber glass	None, < 4° C	7 days to extract
	TAL Metals	6020, 7470	250 ml plastic	None	28 days
	TAL Pesticides / PCBs	8081, 8082	1 liter amber glass	None, < 4° C	7 days to extract

Note: *1) All sample containers will be provided by Access Analytical, Inc. with appropiate chain of custody documentation.*
2) VOCs - Volatile Organic Compounds
3) TAL - Target Analyte List
4) TCL - Target Compound List
5) HCL - Hydrochloric Acid
6) HNO3 - Nitric Acid