

ROY COOPER Governor MICHAEL S. REGAN Secretary MICHAEL SCOTT Director

September 27, 2018

Mr. Joseph Alfano Superfund Branch, Waste Management Division US EPA Region IV 61 Forsyth Street. SW Atlanta, Georgia 30303

SUBJECT:

Concurrence with Record of Decision (ROD)

Holcomb Creosote Company Yadkinville, Yadkin County

Dear Mr. Alfano:

The State of North Carolina by and through its Department of Environmental Quality, Division of Waste Management (herein after referred to as "the state"), reviewed the Record of Decision received by the Division on September 5, 2018 for the Holcomb Creosote Company Superfund Site and concurs with the ROD subject to the following conditions:

- State concurrence on the ROD for this site is based solely on the information contained in the ROD received by the State on September 5, 2018. Should the State receive new or additional information which significantly affects the conclusions or remedy contained in the ROD, it may modify or withdraw this concurrence with written notice to EPA Region IV.
- 2. State concurrence on this ROD in no way binds the State to concur in future decisions or commits the State to participate, financially or otherwise, in the cleanup of the site. The State reserves the right to review, overview comment, and make independent assessment of all future work relating to this site.
- 3. If, after remediation is complete, the total residual risk level exceeds 10⁻⁶, the State may require deed recordation/restriction to document the presence of residual contamination and possibly limit future use of the property as specified in NCGS 130A-310.8.





Mr. McKenzie Mallary State Concurrence with the Final Explanation of Significant Differences for Operable Unit 1 Celanese Corporation NPL Site NCD 003 446 721 September 19, 2018 Page 1

4. State concurrence on this ROD is based on the assumption that State Superfund contracts for this ROD will be issued incrementally based on the cleanup effort required at the site. The first contract should cover the excavation of contaminated soil and sediments at the site, disposal in an on-site capped containment cell, in-situ solidification/stabilization of non-aqueous phase liquid impacted soil, maintenance of existing soil caps and institutional controls. Following contracts will cover the groundwater remediation proposed at the site.

The State appreciates the opportunity to comment on the ROD and looks forward to working with EPA on the remedy for the subject site. If you have any questions or comments, please call Ms. Beth Hartzell (919) 707-8335.

Sincerely,

Jim Bateson, L G., Chief

Superfund Section

Division of Waste Management

cc: Ou Qi, NC Superfund