

Friends of Bolin Creek  
P.O. Box 234  
Carrboro, NC 27510  
December 26, 2014

Mr. Lance Norris, Public Works Director  
Town of Chapel Hill  
405 Martin Luther King Jr. Blvd.  
Chapel Hill, NC 27514  
lnorris@townofchapelhill.org

Dear Mr. Norris:

We have reviewed the Town of Chapel Hill (“Town”) and Falcon Engineering’s Phase I Remedial Investigation Work Plan (the “Work Plan”), as well as DENR’s comments on the plan in a December 3, 2014 email exchange requesting a revised Work Plan. We offer the following comments for the Town’s forthcoming revision to the Work Plan:

1. The Town should continue to sample groundwater from MW-1 as requested by DENR in its September 19th letter. The most recent results from this well showed violations of the North Carolina 2L groundwater standards for arsenic, barium, chromium, and lead. However, Falcon Engineering’s October 3, 2014 response for the Town to DENR’s September 19, 2014 comments asserts without support that “MW-3 and MW-4 provide more adequate evaluation of groundwater impacts.” The validity of MW-1’s results have not been called into question by the Town, Falcon, or DENR, and they show significant levels of coal ash contamination of groundwater. The Town, via Falcon, provided inaccurate and misleading responses to DENR’s Site Evaluation Questionnaire (#5) when it stated there is no impact to groundwater. First, the Town inappropriately relied on filtered samples, as DENR pointed out in its September 19 comments, and it ignored the earlier results showing serious groundwater contamination. Second, the Town ignored the MW-1 results, even though there is no exception in the 2L groundwater rules for unpermitted groundwater pollution on the property.
2. The Work Plan proposes to replace two existing groundwater monitoring wells, MW-3 and MW-4, which the Work Plan states are exhibiting high turbidity. To our knowledge, no concerns about turbidity were raised in the March 2014 Site Characterization report that presented results from MW-3 and MW-4. The validity of those groundwater monitoring data was not questioned by the Town or its environmental consultant, Falcon Engineering, in that report. Thus, we question the need to replace MW-3 and MW-4.
3. Regardless, additional monitoring wells are needed. The Town should install more monitoring wells in order to sample groundwater from more locations on the site. In order to document the extent of groundwater contamination and adequately evaluate the

site, we request that the Town install additional monitoring wells on the eastern portion of the property and several monitoring wells along the southern border of the property between the Bolin Creek Trail and Bolin Creek. This is important in order to ascertain the extent of groundwater contamination in the vicinity of Bolin Creek that may be flowing into the creek.

4. We also request that the Town begin sampling the sediments in Bolin Creek at and downstream of the Police Station property. Duke University studies have found that coal ash pollutants tend to accumulate in the sediments of nearby water bodies, and in this case the contaminated groundwater at the site appears to flow to Bolin Creek. The Town has tested the surface water column but not the sediments. We requested sediment testing in our May 20, 2014 letter and petition to the Town Council and reiterate it here. Upstream samples should be taken above Pathway Drive in Carrboro, where the Creek is not on the 303(d) impaired list.
5. Sampling of both the monitoring wells and creek sediments should test for boron – a pollutant frequently associated with coal ash -- in addition to the full range of constituents analyzed in the July 2013 Site Assessment report (see p. 20 of that report), which included dangerous substances like thallium that were not sampled in the more recent testing.
6. The Town has inaccurately and misleadingly responded to the Site Conditions Questionnaire (#4) with respect to Bolin Creek. The Questionnaire asks whether the creek is known to be impacted. The Town's July 2013 Site Assessment report (p.21) found exceedences of water quality standards for iron and manganese, and stated, "Surface water sampled from Bolin Creek exhibited results indicative of environmental contamination above established action levels." But the Town does not acknowledge this finding in its response to the Questionnaire. Instead, the Town cites only its March 2014 testing to claim there is no impact to the creek; even then, the March 2014 testing showed barium in the surface waters.

Thank you for your attention to the serious contamination the Town has documented thus far at the Police Station property, and for your consideration of these comments in order to ensure a thorough understanding of the extent of the pollution and need to clean it up.

Sincerely,

Julie McClintock  
President, Friends of Bolin Creek

cc: Ms. Amy Axon, Division of Waste Management, NC DENR  
Qu Qi, Central Unit Regional Supervisor at DENR  
Friends of Bolin Creek Board members