



NORTH CAROLINA  
*Environmental Quality*

ROY COOPER  
*Governor*

MICHAEL S. REGAN  
*Secretary*

MICHAEL SCOTT  
*Director*

**VIA EMAIL**

March 27, 2020

Eric Nesbit  
Geosyntec Consultants of NC, P.C  
2501 Blue Ridge Road, Suite 430  
Raleigh, NC, 27607

Re: REC Work Phase Audit  
UNC-Cogeneration Facility  
Chapel Hill, Orange County, NC  
Site ID No. NCR000010272

Dear Mr. Nesbit:

As required by law, the Inactive Hazardous Sites Branch (Branch) conducts audits of remedial actions carried out by environmental consulting firms at sites in the privatized Registered Environmental Consultant (REC) Program. Self-certification by RECs replaces state oversight of the cleanup activities. As such, auditing of remedial activities for regulatory compliance is conducted to ensure protection of public health and the environment and to evaluate progress toward achieving cleanup goals. These audits also help us improve our procedures, guidance documents, and training for RECs working on projects in the program.

I have reviewed the remedial action plan work phase and the remedial action progress work phase for the UNC-Cogeneration Facility (Site). More specifically, I have reviewed the Remedial Action Plan approved by you on May 29, 2018, the two quarterly updates with monitoring data received on October 12, 2018, and April 12, 2019 and the other quarterly updates contained in the file that you certified as the Registered Site Manager (RSM) for the Site. Based on my review of the documents and other file information, the following items were noted:

The Remedial Action Progress Reports required by 15A NCAC 13C .0306(o) must contain at least the following information:

- (1) operation and maintenance results, i.e., summaries of remedial action operating and maintenance requirements and a discussion of major problems encountered;
- (2) performance evaluation results, i.e., tabulated and graphical presentations of monitoring data and a comparison of remedial action performance to design goals;



- (3) a description of all field and laboratory quality control and quality assurance procedures followed during any sampling and analysis;
- (4) tabulation of analytical results for all sampling and copies of all laboratory reports including quality assurance/quality control documentation; and
- (5) a map, drawn to scale, showing all soil sample and monitoring well locations.

For the monitored natural attenuation (MNA) remedy implemented at the Site I was not able to find a discussion of performance evaluation and results, field and lab QA/QC discussions, laboratory reports that would enable me to do our QA Audit, or a discussion related to the management of investigation derived waste (IDW).

Within 30 days, please provide the missing information to demonstrate that the selected MNA remedy is effective so I can conclude this technical review. Your response must be certified in accordance with .0306(b).

If you have any questions or would like to meet with us to discuss the project and my audit findings, please contact me at [Dianne.thomas@ncdenr.gov](mailto:Dianne.thomas@ncdenr.gov).

Sincerely,



Superfund Section  
Division of Waste Management

