

Memo

To: Scott Miller
From: John Herbert
CC: Wayne Reiber, Manu Sharma, Mark Taylor, Carrie McCoy, Bill Osteen, Kelsey Helton, Brandie Stringer, Ted Goodman, Gus Olmos, Rick Hutton, Stan Feenstra, Steve Poirier, Brian Cotter, Pat Cline
Date: 5/18/2018
Re: Cabot/Winn Dixie

During the May 15 monthly conference call, it was mentioned that the Harbor Freight business is going to relocate to the east side of the former Winn Dixie store. GRU understands that they will occupy the eastern ~40% of the former Winn Dixie and will remodel the space to include restrooms adding a loading dock. Both of those operations will require cutting holes through the slab (for the restroom addition) and through the asphalt (for the loading dock). We understand, from the conversation during the conference call, that Cabot will collect samples of the excavated soil to characterize it for disposal.

As we know, the Cabot refinery and associated storage tanks and the pine tar storage facility were located where the former Winn Dixie store is now located, DNAPL has been observed in borings near the NE corner of the building, elevated groundwater concentrations have been documented downgradient of the presumed sources, and the area beneath the building has never been characterized. An attached figure shows elevated 3&4 methylphenol concentrations downgradient of the pine tar storage area.

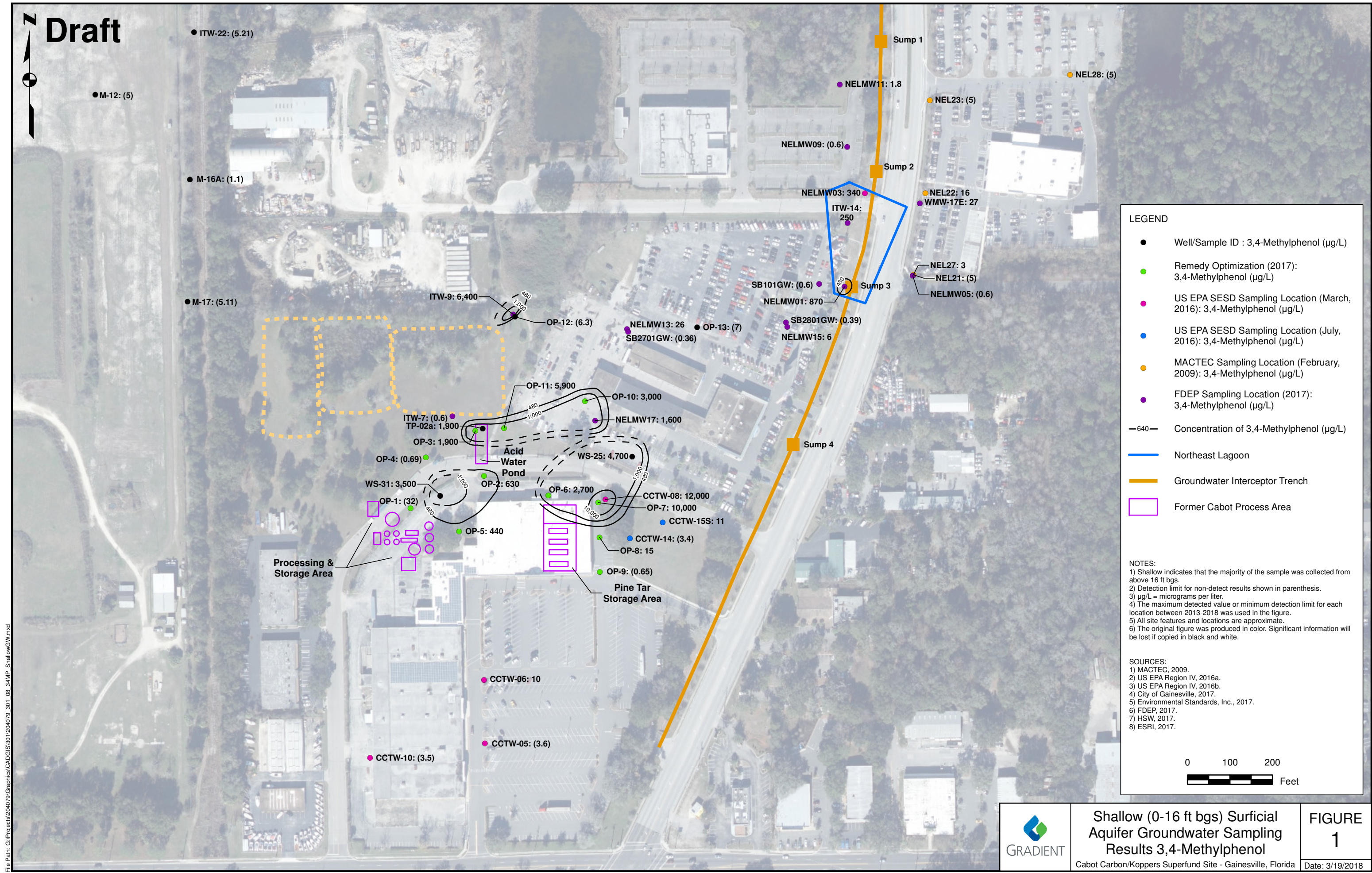
GRU views the Harbor Freight remodeling work, and the short time before they occupy the space, as unexpected and rare opportunity to perform characterization beneath the building slab. We believe this is an opportunity to collect soil and groundwater samples (upper and lower surficial groundwater) while they have holes cut in the slab. GRU further believes that this is an opportunity - while the former Winn Dixie is unoccupied - to do additional soil and groundwater testing more broadly beneath the slab - not restricting ourselves to penetrations made by Harbor Freight to relocate the restrooms.

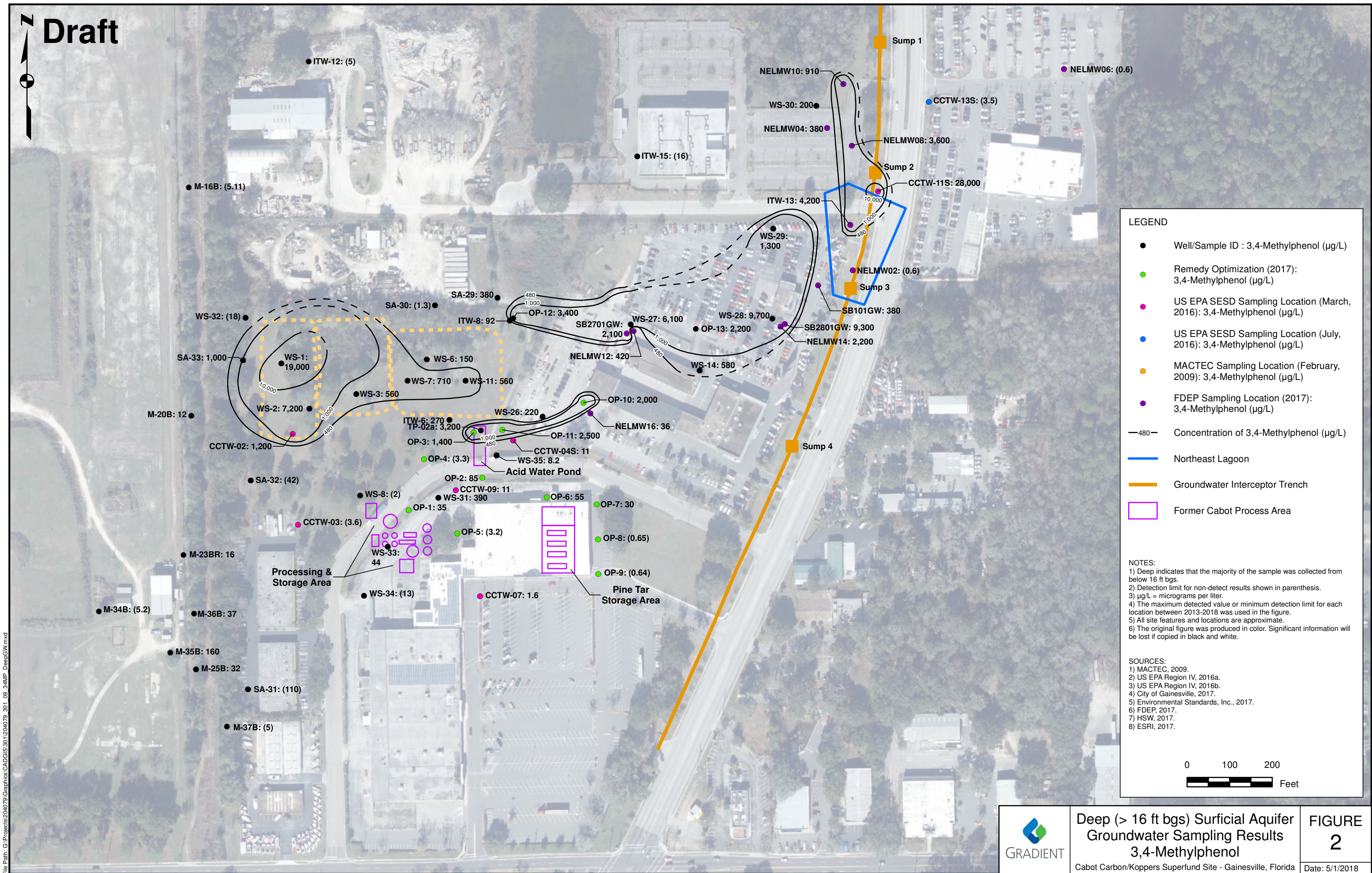
An attached figure shows locations that GRU proposes for collection of DPT soil and groundwater samples (shallow and deep surficial groundwater samples). These locations are intended to investigate the pine tar storage area (three proposed sample locations), the

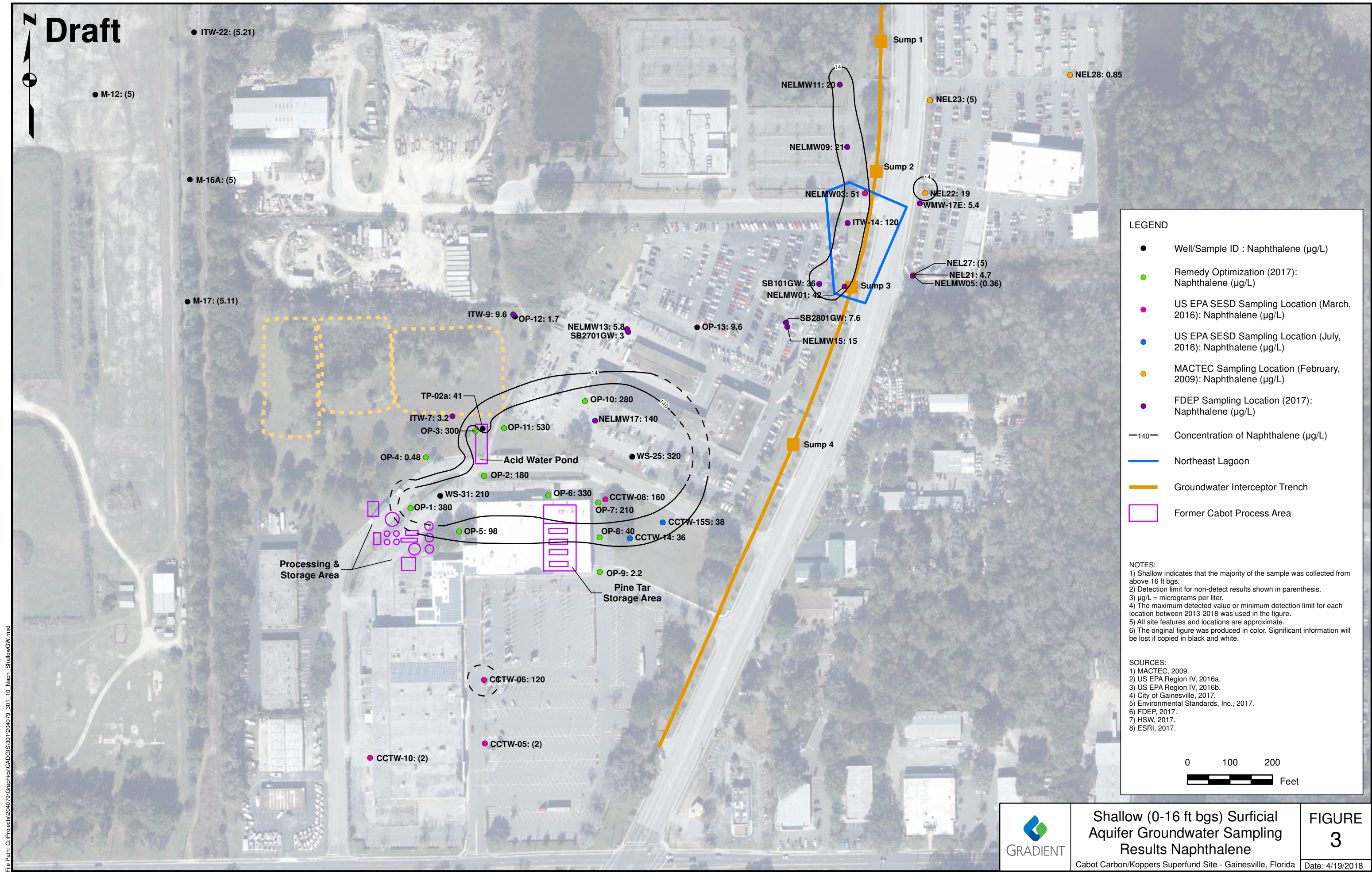
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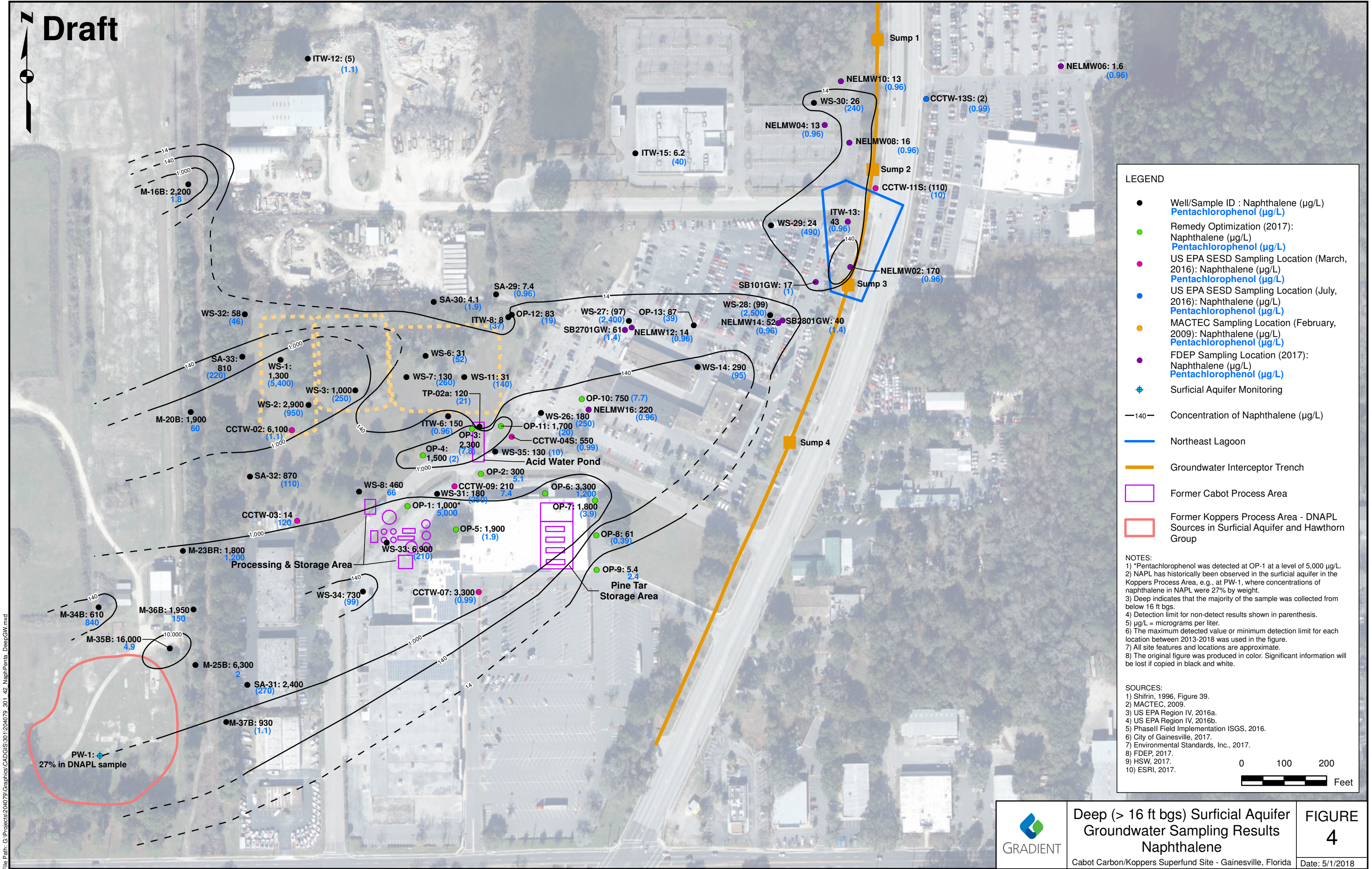
refinery and associated tanks (two proposed sample locations), and the LE tank (one proposed sample location). All six of these proposed locations are inside the building where no soil or groundwater samples have been collected. An additional set of DPT samples could be collected at the loading dock (footer excavation outside the building) if that does not duplicate existing data.

GRU looks forward to discussing this with you next week. We understand that time is of the essence because Harbor Freight will reportedly begin their work the middle of June.









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