

West End Revitalization Association (WERA)

(b)(6) Privacy, (b)(7)(C) Enf. Privacy Mebane, NC 27302

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“Are You Getting the Basic Amenities Your Taxes Paid For?”

<http://blog.epa.gov/ej/2012/12/1005/>

September 17, 2014

Anthony Fox, Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Eric Holder, Attorney General
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, DC 20044-7611

Gina McCarthy, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
mccarthy.gina@epa.gov

The West End Revitalization Association (WERA) is requesting written responses from USDOT, DOJ and EPA regarding URGENT matters presented here.

URGENT! Hazardous Waste Site that should be placed on the Superfund's National Priorities List (NPL) Southeast. Cleaning up hazardous waste sites protects human health, raises property value, and facilitates the economic restoration of communities. EPA's Emergency Response and Removal Branch (ERRB) is needed, per Superfund's Comprehensive Environmental Response Compensation and Liability Act (CERCLA), at Craftique Furniture Company site before 119-bypass and overpass or any construction takes place. NOTE: EPA is current supervising clean-up in Pritchard, Alabama, years after interstate I-165 was construction through areas of industrial soil and water pollution, thus spreading arsenic and lead contaminants throughout an 85% low-income African American community. We want some preventive measures that have not be taken by the North Carolina Department of Transportation (NCDOT), North Carolina Department of Environment and Natural Resources (DENR), or USDOT. All have

been aware of this massive acreage of identified (benzenes, naphthalene, and xylenes) and unidentified industrial furniture chemical contaminants for at least 15 years without action to clean-up this now closed site with several brownfields buildings and untold above and below ground toxins. (See Attachment 1, 2, 3, and 4).

Complaint RE: Goods Movement Corridor Construction Must Protection Water, Soil, Wetlands, Ecosystems and Human Health, and Low-Income Minority Populations under Title VI of the Civil Right Act of 1964 (Oversight Requirements for: NCDOT 119-Bypass/Overpass STIP Number: U-3109) in Mebane, NC – Alamance County

This complaint is filed against the North Carolina Department of Transportation (NCDOT) for mis-representing mapping dimensions and related narratives in the Record of Decision (ROD) for the NC 119 Relocation I-85/40 to South of SR 1918 (Mrs. White Lane) Mebane, Alamance County (Federal Aid Project No. STP-119(1) State Project No. 8.1470901- WBS Element 34900.1.1 - TIP Project No. U-3109 December 2009). This misrepresentation amounts to distribution of deceptive and misleading hardcopy information provided to the general public, including the impact on African American residents, and on the NCDOT's website at <http://www.ncdot.gov/projects/nc119relocation/> . This results in the underestimation of the adverse impacts to the quality of life for low-income and minority residents and the environment in which they have lived for over 150 years, the end of slavery. The misleading and misrepresentations in the 2009 ROD should be addressed and corrected under the following federal laws and statutes:

1. Title VI of the Civil Rights Act of 1964.
2. Eminent domain and right-of-away acquisition statutes.
3. North Carolina's Sunshine Laws and the federal Freedom of Information Act.
4. Relocation Assistance Act.
5. Public health and environmental protection statutes: Clean Air Act; Clean Water Act; Safe Drinking Water Act; Toxic Substance Control Act; Solid Waste Disposal Act / Resource Conservation and Recovery Act (RCRA); Wetlands Protection Act; Watershed Protection Act; and Storm Water Management Act.
6. Environmental Justice Executive Order 12898 of 1994.
7. President Barack Obama's Memorandum of Understanding on Environmental Justice and Executive Order 12898 of August 2011. Focus Areas: (1) implementation of the National Environmental Policy Act; (2) implementation of Title VI of the Civil Rights Act of 1964, as amended; (3) impacts from climate change; and (4) impacts from commercial transportation and supporting infrastructure ("goods movement"). These efforts will include interagency collaboration.

The West End Revitalization Association (WERA) was founded in 1994 and incorporated as 501-(c)(3) non-profit in Mebane, NC. WERA's mission includes supporting access to "basic public health amenities" (clean air, safe drinking water,

sewer lines, housing, streets, sidewalks, and storm-water management) for people of color in marginalized communities.

February 10, 1999: WERA filed interagency complaints at U.S. Department of Justice under Title VI of the Civil Rights Act of 1964 and Environmental Justice Executive Order 12898 – 1994. Complaints were filed to support first-time infrastructure installation under the Clean Air Act, Safe Drinking Water Act, Clean Water Act, Resource Conservation and Recovery Act, etc.

WERA challenged the planned 119-Bypass 8-lane interstate corridor (27-miles at one billion dollars) that would destroy two historic African and Native American communities, without input or fair compensation for homes and churches. Highway construction would exacerbate public health issues related to hundreds of homes and churches adjacent to landfills and sewage treatment without access since 1921. WERA translated this “common knowledge” into a list of public health disparities and drafted administrative complaints at DOJ under Title VI of the Civil Rights Act of 1964 and referenced the environmental justice Executive Order 12898 of 1994. DOJ asked six branches of the federal government to investigate the oversight of civil rights and public health guidelines during the highway planning process that had been going on for 16 years, without opportunities for public input.

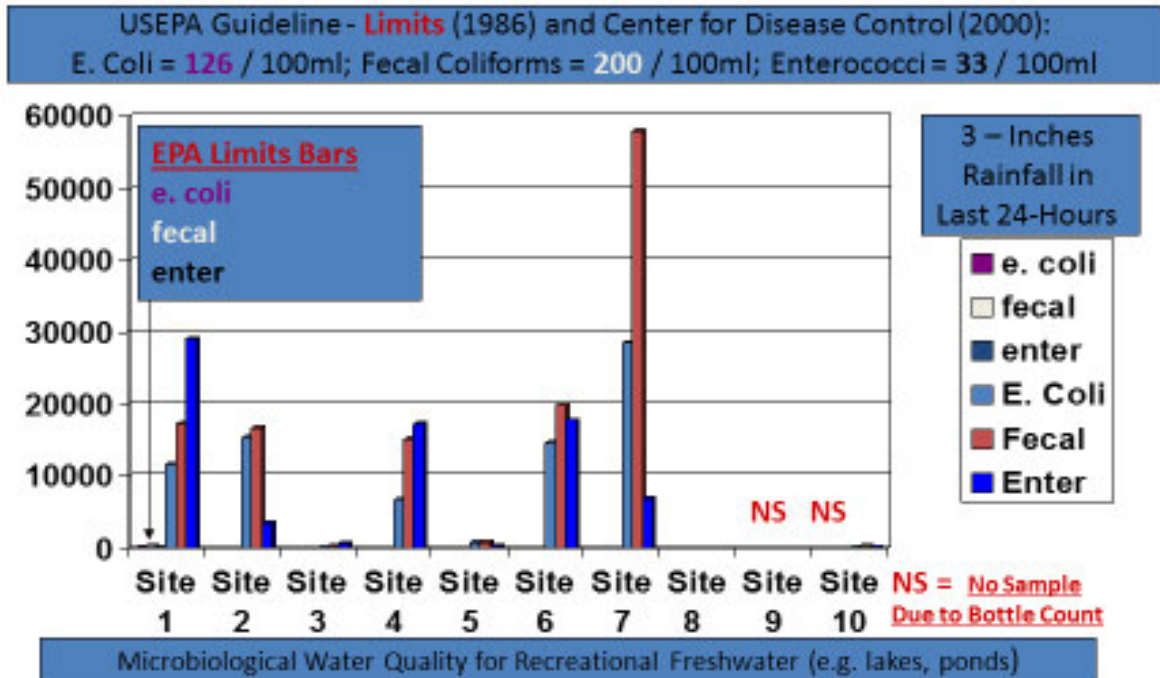
As a result, there has been a moratorium on construction of the highway since 1999, in order to ensure that actions to mitigate the potential impacts of the construction are put in place. Additionally, more than 100 African American homeowners have had sewer lines installed for the first time, even though homes have been within two to three blocks from the municipal sewer treatment plant since it was constructed in 1921. Property owners were required to dig up underground storage tanks and dispose of them. In addition, federal matching block grants were distributed to rehabilitate houses and repair sidewalks and streets.

In 2014, Basic Public Health Amenities Issues Still Addressed by WERA in West End and White Level Communities:

1. Eight lane 27 mile 119-bypass/overpass and interstate corridor through and adjacent to communities.
2. Benzenes, naphthalene, and xylenes that leaked from underground storage tanks that threatens well water and groundwater supply in the overpass construction site.
3. Failing on-site septic systems near private unregulated drinking water wells.
4. Surface water contamination up to 300 times the USEPA Maximum Contaminant Limit (MCL) for fecal coliforms, *E. coli*, and Enterococci.

Outcome #2: Surface Water Sample Sites (Third Round)

Buckhorn / Perry Hill, West End, White Level Communities



Omega Wilson, Community Facilitated Strategy – 2-29-08

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The West End Revitalization Association in collaboration with research and legal partners, including operational funding from the Z. Smith Reynolds Foundation (Winston Salem, NC), documented surface water contamination as indicated in the above graph. The following three research projects supported these findings. How much will the highway construction exacerbate and spread the microbial contaminants without the oversight of the Environmental Protection Agency under the Safe Drinking Water Act and the Clean Water Act?

2001-02 - Project Manager – “*Failing Septic On-Site Systems and Contaminated Well Waters: African American Communities in Mebane, North Carolina*” - Environmental Justice Small Grant (\$15,000) Office of Environmental Justice EPA, Region-4 Atlanta, GA (with an Internal Review Board (IRB) Certification at School of Public health, University of North Carolina, Chapel Hill).

2004-05 - Co-Manager with Chris Heaney of “*Community-Based Participatory Monitoring and Training: Public Health and Environmental Risks in Low-Income Minority Communities in Mebane, North Carolina*”; \$10,000 EXPORT Pilot Project by Ethnic, Cultural, and Health Outreach (ECHO) collaboration with Cecile G. Shepp Research Center at UNC-Chapel Hill.

2004-07 - Project Manager of “Right to Basic Amenities” Model Development with an U.S. EPA Approval Quality Assurance Plan (QAP) in collaboration with the Virology Laboratory at the School of Public Health, University of North Carolina- Chapel Hill. Only North Carolina Awardee (\$100,000) of 30 national “Collaborative Problem-Solving Agreement” - Office of Environmental Justice, EPA, Washington, D.C.

In 1999, the North Carolina Department of Environment and Natural Resources drilled several test wells on the Craftique Furniture site and identified a petroleum plume with benzene, naphthalene, and xylenes over forty feet below ground level from leaking underground storage tanks. On June 17, 2002, Darren R. Lockhart, PMII/Environmental Geologist (b)(6) Privacy, (b)(7)(C) Enf. Privacy stated that, “The direction of groundwater flow is towards the north/northwest”, which the direction of Graham-Mebane Lake (See ATTACHMENT 3). This site is adjacent to the watershed of the Graham-Mebane Lake that supplies drinking water to over 50,000 people in Alamance County, NC.

Where are the assurances that the dynamiting and earth moving actions of the bypass and overpass construction will not exacerbate and spread petroleum contaminates and other undisclosed chemicals, solvents, stains, and paints products that were dumped on site for decades? Again, it is the legal obligation of the Environmental Protection Agency to provide on-site oversight of this hazardous furniture site clean-up of pollutants under the Toxic Substance Control Act and disposals of building materials and brownfield structures under the Solid Waste Disposal Act / Resource Conservation and Recovery Act (RCRA). The site clean-up should be completed before the construction of the bypass and overpass at the Craftique Furniture site.

WERA - Community Facilitated Strategy

Outcome #7: Reduction Cancer and Disease Causing Hazards



Removal of 20,000 gallon
Underground Storage Tanks
Leaking Cancer Causing
Petroleum (1/15/08)



Repair of City of Mebane
Sewer and Water lines
leaking into Stream at
City Park (Feb. 2007)

(b)(6) Privacy, (b)(7)(C) Ent. Privacy

Community Facilitated Strategy – 2-29-08

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Mitigations of Actual 119-Bypass/Overpass Construction: NCDOT maps do not truly represent impacts to residential property, streams and wetlands, hazard sites, watershed of Graham-Mebane Lake.

1. NCDOT notice letters of property acquisition under eminent domain were not mailed to all impacted residents during fall 2013 which is regulated under the Freedom of Information Act.
2. NCDOT maps do not represent impacts to houses impacted in African American community of West End and White Level regulated under Title VI of the Civil Rights Act of 1964 and the Relocation Assistance Act. The houses and apartments in the predominately white Fieldstone community are accurately highlighted with correct street geo-locations. In the predominately African American West End and White Level communities, the maps compressed and distorted street locations and connections without full highlight of houses and churches.
3. Maps and ROD do not indicate procedures to protect groundwater, air quality, and human exposures per 119-bypass/overpass. NCDOT engineers had stated that dynamiting granite would be required at the old Craftique Furniture Company in order to install five-story overpass concrete pillars that will be in the

underground plume of petroleum that leaked from underground storage tanks for decades, per NC DENR files. This would further spread the cancer causing benzenes and xylenes in soil and ground water regulated under the Clean Water Act, Safe Drinking Water Act, and Toxic Substance Control Act.

4. Hazardous Materials Sites at planned 119-overpass construction corridor should include Craftique Furniture Company on 70-Highway and an AmeriGas propane gas tank distribution site on West Holt Street. The support structures for the overpass would be anchored at the Craftique property and the propane gas site would be virtually underneath the overpass.
5. Adverse impacts to 16 streams and wetlands crossed and interrupted by eight lane construction corridor over just 5.6 miles from current I-85 to current 119-Highway North at Mrs. White Lane in White Level Community should be protected under the Clean Water Act, Storm Water Management Act, and Wetlands Protection Act.
6. Putting the remaining homes and properties in a new flood plain the highway construction is regulated under Storm Water Management Act.
7. Damage to remaining residential properties (driveways, streets, access, and outlets) regulated under Right-of-Way Requirements and the Uniform Act.
8. Boxing West End and White Level residents in by closing West Holt Street at Latham Lake Road, railroad crossing at Moore Road, and rail-spur to accommodate industrial rail distribution, etc.
9. Future widening of railroad corridor and 70-Highway to accommodate massive automobile and diesel truck traffic from the existing and expanding industrial park (1000+acres) and distribution park (2600+acres). Industrial park properties on the east and west sides of the planned 119-bypass/overpass corridor adjoins residential properties in West End Communities are at risk from air, noise, traffic pollution, and diesel engine particles (PM 2.5 and 10).
10. "Emission Shock" to workers in the highway construction corridor for years exposed air borne contaminants exceeding EPA Clean Air Act guidelines. The "emission shock" during construction is very important because significant impacts are to construction workers with minimum protective measures in place under the Occupational Safety and Health Act. At least 80-percent of the NCDOT employees pouring and finishing asphalt streets in Mebane, NC, as recent as August 2014, were African American and Hispanic men and women, exposed toxins without respiratory protection or any kind.

Relief from the North Carolina Department of Transportation is sought by the West End Revitalization Association, impacted residents, and collaborative partners include:

1. Re-produce maps with proportions that are geographically accurate and true for access, residential streets, and properties in West End and White Level Communities. This includes a true representation of improvements, widening,

curb/gutter, and turning lanes to handle increased traffic flow on and off the planned 119-bypass on residential streets. Residential property damaged for improvements should be clearly highlighted and owners informed in writing.

2. Rewrite narrative and charts/graphs/figures in ROD for full public disclosure.
3. Conduct public hearings in Mebane, NC to present full disclosure and answer questions regarding the corrected NCDOT ROD, including full maps displays with supporting narrative and charts/graphs/figures. Maps should include each of the 16 streams and wetlands crossed and otherwise impacted with planned mitigation measures of piping, storm water management, and altered flood plains.
4. Mailing notice letters to all impacted property owners in West End and White Level Communities as well as other property owners along the planned highway construction corridor.
5. Address the issue of NCDOT's relocation of (b)(6) Privacy, (b)(7)(C) Ent. Privacy Church from the 119-bypass/overpass and access ramp site into the path of the access lane and right-of-way where US 70-Highway will be widened to four lanes. This impact to (b)(6) Privacy, (b)(7)(C) Ent. Privacy Church property will be further exacerbated by NCDOT plans to widen 70-Highway again after completion of the 119-bypass/overpass. This amount to throwing this African American church, which was founded by former slaves and their descendants (c.1893), "from the frying pan into the fire!"
6. Address: *Truth: West End is an African American community still targeted by the 119-Bypass with plans to 'dead-end' Holt Street (TIP-3109); White Level is an African American (and Native American) community to be gutted in half by the 119-Interstate to Danville (TIP-3105); West End's (b)(6) Privacy, (b)(7)(C) Ent. Privacy Church, founded in 1893 by former slaves, will be destroyed by widening U.S. 70-Highway (TIP-2546) to five lanes and a sixth turning lane onto the 119-Bypass, through the fifth row of pews in the church. Truth: At West Holt Street, Southern Railroad, and 70-Highway, NCDOT maps show that the one-mile long and 45-foot high overpass will be anchored 30-to-40 feet deep by concrete pillars in a toxic spill. In 1989, Craftique Furniture Company's underground petroleum storage tanks were documented as leaking 10,000 gallons of gasoline and diesel fuel that are still spreading underground. (See ATTACHMENT 2)*
7. In specific reference to **Cleaning up hazardous waste sites protects human health under Superfund's Comprehensive Environmental Response Compensation and Liability Act (CERCLA) and National Priorities List (NPL)**, WERA is requesting long-term air, water, and soil quality monitoring at the Craftique Furniture site and along the 119-bypass/overpass corridor and adjoining properties at the expense of EPA, NCDENR, and USDOT, NCDOT, and Craftique Furniture Company's

property owner (Pulaski Furniture Corporation, One Pulaski Square Pulaski, Virginia 24301). Public hearings should be held with written reports of findings presented to residents near the site as well as for all Mebane areas residents. Funds for tangible improvements in low-income minority communities are to be considered as well.

Find NCDOT Record of Decision and digital maps of the 119-bypass and overpass, in and near West End and White Level communities, and the watershed for Graham-Mebane Lake drinking water source for over 50,000 residents and businesses in the City of Graham and City of Mebane and central and eastern Alamance County, at NCDOT's website here <http://www.ncdot.gov/projects/nc119relocation/> . This highlights continued patterns of impacts by the highway corridor and adjacent industrial and distribution parks already under construction.

WERA's board, staff, impacted residents, and partners have great concerns over whether NCDOT actual years of right-of-way acquisitions and construction will, in fact, comply with civil rights, environmental, and environmental justice laws and guidelines. After relocations of homes and businesses, and removal of 187 acres of forest and residential land, what will the sustainability of residential living of 150 years? What will be the sustainability of the bio and ecosystems of animals and wildlife in the watershed and 16 streams and wetlands cross by the highway corridor in first 5.6 miles from I-85 north to White Level at the current Highway-119 at Mrs. White Lane?

Remaining homes and properties may be left in a new flood plain caused by the highway construction. Officials in President Barack Obama's administration have often referenced "*shovel ready*" transportation corridor construction projects that will create jobs. WERA's board, staff, impacted residents, and partners are very concerned about what environmental hazards those shovels will not only dig up, but cover up in Mebane, NC. Taxpayers and voters deserve the accountability and transparency necessary for improving quality of life, especially where millions of taxpayers' dollars are allocated for the long term. Taxpayers and voters have the right to be assured that they are getting the basic public health amenities for which their taxes paid. <http://blog.epa.gov/ej/2012/12/1005/>

We expect a timely and complete responses from all agencies involved in the interagency process of clean-up at the Craftique Furniture Company site and NCDOT 119-bypass/overpass highway construction corridor.

Respectfully Submitted,

(b)(6) Privacy, (b)(7)(C) Enf. Privacy

(b)(6) Privacy, (b)(7)(C) Enf. Privacy, President / Project Manager - Founding Board Chair – 1994
West End Revitalization Association (WERA)

Background:

- ✓ President Barack Obama-Elect's Environmental Justice Forum – December 2008
- ✓ U.S. EPA's National Environmental Justice Advisory Council (NEJAC) 2007-2010
- ✓ U.S. EPA's Environmental Justice Achievement Award – 2008

- ✓ National Title VI Alliance for Accountability and Transparency 2011-Present
- ✓ North Carolina Environmental Justice Network 2000-Present
- ✓ Environmental Justice Advisor, Haw River Assembly Riverkeeper-NC 2010-Present

CC:

- President Barack Obama, The White House, Washington, DC
- Velveta Golightly-Howell, Director golightly-howell.velveta@epa.gov
Office of Civil Right, Environmental Protection Agency
- Heather McTeer Toney, Regional Administrator, Region 4
Environmental Protection Agency mcteertoney.heather@epa.gov

Naima Halim-Chestnut, Civil Rights Contact, Region 4
Environmental Protection Agency halim-chestnut.naima@epa.gov

Cynthia Peurifoy, Office of Environmental Justice
Peurifoy.Cynthia@epamail.epa.gov
U.S. Environmental Protection Agency – Region 4
- Mustafa Ali, Senior Advisor ali.mustafa@epa.gov
Environmental Protection Agency, Office of Environmental Justice
- Charles Lee, Deputy Associate Administrator Environmental Justice
lee.charles@epa.gov Environmental Protection Agency
- Matthew Tejada, Director, Office of Environmental Justice
Environmental Protection Agency tejada.matthew@epa.gov
- Lawyers' Committee for Civil Rights Under Law, Washington, DC
- Southern Environmental Law Center, Chapel Hill, NC
- Vandeventer Black Law Firm, Raleigh, NC
- EarthJustice, Inc., New York, N.Y.
- North Carolina Environmental Justice Network
- Haw River Assembly Riverkeeper, Bynum, NC
- Clean Water for North Carolina, Durham, NC
- North Carolina Conservation Network, Raleigh, NC

ATTACHMENT 1: “Racism, Officially”

Omega Wilson’s Letter to the Editor was printed the in Psychology Today Magazine – July/August 2002 Issue. Entitled “Racism, Officially”

INSTITUTIONAL RACISM It is more than interesting that Dr. Montieth and Winters ("Why We Hate," Psychology Today Magazine - May/June 2002 article), grossly over looked "institutional racism" and "revisionism" as systematic and planned contributors to hatred and racism. Our nonprofit community development corporation has filed civil rights and environmental justice complaints with the U.S. Department of Justice (Feb 1999) in order to stop plans to construction a four-lane highway through two 100-year old African American communities, without their input or knowledge. The City of Mebane, N.C. Department of Transportation, and Federal Highway Administration sought approval for plans that are directly contrary to the Civil Rights Act of 1964. Government officials and highway engineers repeatedly mouthed, "I'm just doing my job!" or "I want to keep my job." Slavery has been abolished in the U.S.A., however, racism still creates an economic gain for those who choice to take advantage. By Omega R. Wilson, President West End Revitalization, Mebane, NC

NOTE: Letter to editor was quoted in article published by The Johns Hopkins University Press – “The West End Revitalization Association (WERA)’s Right to Basic Amenities Movement: Voice and Language of Ownership and Management of Public Health Solutions in Mebane, North Carolina”; Progress in Community Health Partnerships Journal: Research, Education, and Action Fall 2008 • vol 2.3

ATTACHMENT 2: “Mebane’s 119-Bypass: Hidden Truth”

West End Revitalization Association – CDC

(b)(6) Privacy, (b)(7)(C) Enf. Privacy

Mebane, NC 27302-0661

(b)(6) Privacy, (b)(7)(C) Enf. Privacy

(b)(6) Privacy, (b)(7)(C) Enf. Privacy

Letter to Editor (local newspapers): September 30, 2002 (Not Published)

“Mebane’s 119-Bypass: Hidden Truth”

The North Carolina Department of Transportation, Alamance County, and Mebane have renewed their campaign for the Mebane’s “119-Bypass” with a so-called ‘new’ map. The new map leaves out the fact that plans are actually for a 119-Interstate to Danville, Virginia.

They simply added color to the map shown to West End community residents, in 1999, after they filed complaints at the U.S. Department of Justice under Title VI of the Civil Right Act of 1964 and the Environmental Justice Executive Order 12898 for “adverse and disproportionate impact to minority communities” by a federally funded project.

Truth: West End is an African American community still targeted by the 119-Bypass with plans to 'dead-end' Holt Street (TIP-3109); White Level is an African American community to be gutted in half by the 119-Interstate to Danville (TIP-3105); West End's [REDACTED] Church, founded in 1893 by former slaves, will be destroyed by widening U.S. 70-Highway (TIP-2546) to five lanes and a sixth turning lane onto the 119-Bypass, through the fifth row of pews in the church.

Truth: At West Holt Street, Southern Railroad, and 70-Highway, NCDOT maps show that the one-mile long and 45-foot high overpass will be anchored 30-to-40 feet deep by concrete pillars in a toxic spill. In 1989, Craftique Furniture Company's underground petroleum storage tanks were documented as leaking 10,000 gallons of gasoline and diesel fuel that are still spreading underground.

Truth: The N.C. Department of Environment and Natural Resources (DENR) has not fined Craftique or ordered a clean-up of this site in the watershed of Mebane's water supply. DENR records indicate that well water and ground water are affected by contaminants above EPA's legal limits (benzene, naphthalene, and xylenes) that can cause nerve damage, leukemia and cancer.

According to representatives of Wilbur Smith and Associates, of Columbia, S.C., the NCDOT hired them to conduct an "unbiased 119-Bypass community impact assessment." How unbiased can Wilbur Smith and Associates be when they are also being paid by Mebane to complete a "transportation study?" Somebody is pulling our 119-Bypass leg. Wilbur Smith appears to be campaigning for the 119-Bypass/Interstate by withholding the truth.

If you want the truth about the "119-Bypass/Interstate," you will never get it from Mebane, Alamance County, NCDOT, Federal Highway Administration, or their hired consultants. NCDOT engineers have credited the Department of Commerce with forcing the path of the 119-Bypass/Interstate through West End and White Level in order to service the Mebane's industrial park, Ford Motor Company's new warehouse site. Mebane officials are seeking high personal real estate profits from condemned minority owned property. Will we allow civil rights and environmental justice to be sacrificed by three old friends: racism, big money, and politics?

[REDACTED] President
West End Revitalization Association

ATTACHMENT 3: Email Attached Message – June 17, 2003

From: [REDACTED]
To: [REDACTED]
Subject: FYI: Craftique release
Date: Tue, 17 Jun 2003 10:45:24 -0400
Attention: [REDACTED] President WERA
Or website manager

Dear (b)(6) Privacy, (b)(7)(C) Enf. Privacy

I thought I would browse your website to learn more about your association's involvement with preserving your community's historical treasures. I enjoyed talking with you and (b)(6) Privacy, (b)(7)(C) Enf. Privacy last Friday, June 16, 2003. It's nice to know that at the least likely time, we can meet someone that's somehow connected to our past.

While visiting your website, I noticed that the caption beneath the photo of the Craftique site states that there was a 10,000- gallon release of petroleum from USTs which threatens the groundwater in the West End Community. True, there was a release which was discovered in 1989 but the quantity which was released was not 10K gallons. This is most likely a gross over-estimation of quantity of petroleum introduced into the subsurface and an apparent assumption that the UST capacity would equal the amount of product lost to the environment (the UST capacity was 10K gallons, not the amount released). Note that no free product (No.2 Fuel Oil), or free phase petroleum hydrocarbons, were found in any of the onsite groundwater monitoring wells. Hypothetically speaking, a release of 10K gallons of petroleum into the subsurface would result in a significantly larger contaminant plume with significantly greater levels of contaminants; fortunately, this is not the case. Given that the contaminant plume has been mapped and its limits have been defined, we can estimate how much petroleum is in the subsurface as a result of the release using the chemical data collected from sampling the soil and groundwater.

By using a simple mass balance calculation, a more accurate estimate of the amount of petroleum hydrocarbons released to the subsurface would be ~300 gallons (+/-100 gallons). This was calculated using: the volume of impacted soil [which was accurately assessed and mapped during the CSA (1999)] and a conservative average concentration of petroleum hydrocarbons.

Furthermore, the "potential" for (b)(6) Privacy, (b)(7)(C) Enf. Privacy well to influence contaminant flow only exists because her well is situated in the vicinity (nearest) of the release area, not necessarily because impact to her well from the Craftique site is likely to occur. The direction of groundwater flow is towards the north/northwest and not towards the Ms. Foust's property, which is to the east. Therefore, the potential for Ms. Foust's well, a single family resident, is minimal.

We respectfully request that the caption in question be revised to reflect the information provided herein. Public awareness can be essential to the survival of communities everywhere as long as the information provided is true and accurate.

El, Inc. and the owners of the Craftique site, Pulaski Furniture Corp., appreciate your assistance in this matter. If you have any questions regarding this request, please feel free to contact me (b)(6) Privacy, (b)(7)(C) Enf. Privacy (my direct office line), or email at (b)(6) Privacy, (b)(7)(C) Enf. Privacy Thank you.

Sincerely,

Darren R. Lockhart, PMII/Environmental Geologist

NOTE: Below are photos taken, by (b)(6) Privacy, (b)(7)(C) Enf. Privacy of well water testing at (b)(6) Privacy, (b)(7)(C) Enf. Privacy residence on Walker Road adjoining Craftique Furniture Company property.



Attachment 4 - Photos: Sept 15, 2014

by (b)(6) Privacy, (b)(7)(C) Enf. Privacy



Craftique Furniture Company entrance at 1257 West Center St, Mebane, NC 27302

Craftique Furniture Company buildings at 1257 W Center St, Mebane, NC 27302



(b)(6) Privacy, (b)(7)(C) Enf. Privacy Church at (b)(6) Privacy, (b)(7)(C) Enf. Privacy
(b)(6) Privacy, (b)(7)(C) Enf. Privacy Mebane, NC 27302 (first
cornerstone struck in 1893 by Freedmen).

(b)(6) Privacy, (b)(7)(C) Enf. Privacy Church's property
adjoins Craftique property to the west at
Walker Road) (View of Craftique Site)



Industrial park construction currently underway at West Holt Street and Latham Lake Road (adjoining 119-bypass /overpass corridor just west of West End Community)

AmeriGas Propane tank distribution site on West Holt Street across the street from industrial site construction and across the railroad from Craftique Furniture Company site at water tank tower in background.

President Barack Obama
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Joe Rich, Attorney
Lawyers' Committee for Civil Rights Under Law
1401 New York Avenue, NW, Suite 400
Washington, D.C. 20005

jrich@lawyerscommittee.org

Ashley Holmes, Attorney
Vandeventer Black Law Firm
434 Fayetteville Street, Suite 2000
PO Box 2599
Raleigh, NC 27602-2599

apholmes@vanblk.com

Chandra Taylor, Senior Taylor
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516-2356

ctaylor@selcnc.org

Marianne Engelman Lado, Attorney
EarthJustice, Inc.
48 Wall Street, 19th Floor
New York, NY 10005
New York, N.Y.

mengelmanlado@earthjustice.org

(b)(6) Privacy, (b)(7)(C) Enf. Privacy, Executive Director
North Carolina Environmental Justice Network
(b)(6) Privacy, (b)(7)(C) Enf. Privacy
Rocky Mount, North Carolina 27802

(b)(6) Privacy, (b)(7)(C) Enf. Privacy

Elaine Chiosso, Executive Director
Haw River Assembly Riverkeeper
P.O. Box 187
Bynum, NC 27228

chiosso@hawriver.org

Hope Taylor, Executive Director
North Carolina Conservation Network
1318 Broad Street
Durham, NC 27705

hope@cwfncc.org

Brian Buzby, Executive Director
North Carolina Conservation Network
19 E. Martin Street, Suite 300
Raleigh, NC 27601

brian@ncconservationnetwork.org

Heather McTeer Toney, Administrator Region 4
Environmental Protection Agency
61 Forsyth Street
Atlanta, GA 30303

mcteertoney.heather@epa.gov

Cynthia Peurifoy, Office of Environmental Justice
U.S. Environmental Protection Agency – Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303-8960

Peurifoy.Cynthia@epamail.epa.gov

Mustafa Ali, Senior Advisor
Office of Environmental Justice - MC: 2201A
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

ali.mustafa@epa.gov

Charles Lee, Deputy Associate Administrator Environmental Justice
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

lee.charles@epa.gov

Matthew Tejada, Director
Office of Environmental Justice
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

tejada.matthew@epa.gov

Velveta Golightly-Howell, Director
Office of Civil Right
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

golightly-howell.velveta@epa.gov