



## EXECUTIVE SUMMARY

This Executive Summary is provided as a brief overview of our geotechnical engineering evaluation for the project and is not intended to replace more detailed information contained elsewhere in this report. As an overview, this summary inherently omits details that could be very important to the proper application of the provided geotechnical design recommendations. This report should be read in its entirety prior to implementation into preliminary design.

- The site was preliminarily explored by three standard penetration test borings. Below the existing ground surface, the borings encountered surficial soils and asphalt pavement underlain by fill materials, residual soils, partially weathered rock, and auger refusal materials.
- Groundwater level measurements were recorded in the borings during drilling and immediately upon completion of drilling operations. Groundwater was encountered at an approximate depth of 18 feet during drilling in borings B-1 and B-2. Groundwater was measured at depths of 19.6 and 12.5 feet upon completion of drilling in borings B-1 and B-3, respectively.
- We recommend that additional analyses be performed regarding an appropriate foundation design bearing pressure once more definitive plans are developed; however, we envision that the yet-to-be-definitively-determined appropriate allowable design bearing pressure for the project will likely fall in the range of 1,500 to 3,000 pounds per square foot (psf) for footings bearing on approved Based on the boring data and assumed loading and grading information, we estimate total settlements due to foundation loads will generally be on the order of 1 inch or less, with differential settlement of  $\frac{1}{2}$  to  $\frac{3}{8}$  the estimated total settlement. The magnitude of differential settlements will be influenced by the variation in excavation requirements across the building footprint, the distribution of loads, and the variability of underlying soils.
- Ground floor slabs may be designed as a slab-on-grade supported by approved residual soils or newly placed controlled fill. Slab-on-grade support is contingent upon successful completion of the subgrade evaluation process as described in the Site Preparation section of this report.
- Any unsuitable materials observed during the evaluation and proofrolling operations should be undercut and replaced with compacted fill or stabilized in-place. The actual extent of undercutting and/or in-place stabilization required can best be determined by a representative of the geotechnical engineer at the time of construction.
- All foundation subgrades should be observed, evaluated, and verified for the design bearing pressure by a representative of the geotechnical engineer after excavation and prior to reinforcement steel placement.
- Based on the preliminary test boring data, we do not generally anticipate that difficult excavation conditions should be expected. However, as noted in the Regional Geology section of this report, differential weathering between rock layers can result in a variable bedrock surface that fluctuates in composition or elevation within short lateral distances.

Once a final grading plan, as well as definitive structure locations and loads are determined, additional geotechnical evaluation will be needed to supplement the conclusions and data from this preliminary study.



**Phase I Environmental Site Assessment  
College Street and Church Street Tract  
104, 108, 118, 206, 210, and 307 College Street and 108 and 205 Church Street  
Pineville, NC**

**1.0 EXECUTIVE SUMMARY**

Froehling & Robertson, Inc. (F&R) performed a Phase I Environmental Site Assessment (ESA) of the College Street and Church Street Tract located at 104, 108, 118, 206, 210, and 307 College Street and 108 and 205 Church Street in Pineville, NC, herein referred to as the Property. The following is a summary of our findings and is not intended to replace more detailed information contained elsewhere in this report.

According to the Mecklenburg County GIS, the Property consists of ten non-contiguous, irregular-shaped parcels which collectively total approximately 6.05 acres. The Property is developed for municipal use and includes the following parcels:

- The south-central parcel (108 Church Street) is 0.393 acres and is developed with an approximate 5,552 square-foot (SF), two-story building with a one-story four bay garage (on the south side of the building) which was constructed in 1969 and operates as the Pineville Volunteer Fire and Rescue Department.
- The southeastern parcel (205 Church Street) is 0.249 acres and is developed with an approximate 3,720 SF, one-story building which was constructed in 1995 and is utilized as an auxiliary three bay garage building by the Pineville Volunteer Fire and Rescue Department.
- The southwestern parcel (307 College Street) is 0.959 acres and contains relic building foundations of former structures (former Pineville Police Department and a reported former bank).
- The northwestern parcel (210 College Street) is 1.05 acres and contains grassed and manicured landscaped areas and a gravel path which extends across the central portion of the parcel in a north-to-south orientation.
- The west-central parcel (206 College Street) is 0.479 acres and is developed with an approximate 3,600 SF building which is utilized as a US Post Office. The adjoining west-central parcel (0 College Street) consists of grassed and manicured landscaped areas
- The central parcels include a 0.551-acre parcel (118 College Street) and an adjoining 1.0-acre parcel (0 College Street). The central parcels are developed with three structures including an approximate 6,791 SF one-story building which is utilized as the Pineville Telephone Company and Pineville Electric Company. The building was originally constructed in 1978 with a building addition constructed on the western side of the building in 1980. In addition, two approximate 1,840 SF and 1,400 SF warehouse buildings which are interconnected by common canopy structures are located on the northern side of the central parcels. The warehouse buildings and associated canopy structures were constructed in the mid 1980s and are utilized for equipment, materials, and vehicle storage, and as field technician offices by the Pineville Telephone Company and the Pineville Electric Company.



- The east-central parcel (108 College Street) is 0.495 acres and consists of grassed and manicured landscape areas.
- The eastern parcel is 0.321 acres (104 College Street) and consists of grassed, wooded, and manicured landscaped areas. The Property also contains two storage sheds, and asphalt-paved ingress, egress and parking areas.

The Property is situated within an urban area of commercial, residential, municipal, and institutional land use in Pineville, NC. The Property is bound to the north by Pineville Public Works Department (former Tillett Chemical Company), a multi-tenant retail shopping center (Red Wing shoes, Blue Rocks bar, billiards, and darts, and The Worship Center church), Growers Outlet (plant nursery and landscape supply), and a vacant Jiffy Lube facility (oil change and automotive maintenance); to the east by Euro Repair (automotive maintenance and repair), beyond which are North Polk Street and commercial development; to the south by Shops on the Main retail shopping center (Heirloom Salon, Holt School of Fine Art, Davidson Violins South, and Good Looks Barbershop), Luna, Inc. (women's boutique corporate offices), Kingswood (custom home builders), Dive N (restaurant), the Well Church & Coffeehouse, and Pineville Chiropractic; and to the west by Pineville Rug Gallery and grassed and asphalt-paved ingress, egress, and parking areas (former Tillett Chemical Company), beyond which are a railroad right-of-way and grassed and wooded land.

Historically, the Property has been developed with the Pineville Volunteer Fire and Rescue Department (main building) since 1969; the US Post Office since 1974; the Pineville Telephone Company and Pineville Electric Company since 1978 (with a building addition constructed on the western side of the building in 1980) and the associated warehouse buildings and canopy areas (located south of the main building) since the mid 1980s; and the three-bay garage building located adjacent to the east of the Pineville Volunteer Fire and Rescue Department since 1995. The southwestern portion of the Property (307 College Street) was historically developed with a former commercial building from the early 1970s to the late 2010s. The building was reportedly utilized as the Pineville Police Department. Based on Mecklenburg County GIS records, the Town of Pineville has owned the parcel since 1994. In addition, the review of aerial photographs (and apparent police cars present), it appears the police department operated in the building from at least 1994 to 2011. The building was demolished by 2017. According to a local resident, the building historically operated as a bank. In addition, a former commercial building was historically located on the southwestern portion of the Property from 1938 to at least 1968. Information regarding the historical occupants of the building was not available. However, based on the location in downtown Pineville, this historical structure was presumably used for commercial retail purposes. The Property was also used for residential purposes in the 1970s as evidenced by city directories. Prior to the 1970s, the Property was developed with five to fifteen apparent commercial and residential structures from 1905 to the late 1960s, and presumably longer. Information regarding the former commercial uses of the Property from 1905 to the late 1960s was unable to be determined through historical research and interviews.

Based upon F&R's review of the federal, state and tribal environmental database report prepared by Environmental Data Resources, Inc. (EDR), the Property was identified on the FINDS federal database and the UST, IMD, LUST, and ASBESTOS state databases. The adjacent sites to the north were identified on the RCRA NonGen/NLR, ECHO, and FINDS federal databases and the IMD, UST, SHWS, and LUST state databases. The adjacent sites to the south were identified on the IMD, INST CONTROL, LUST, and LUST TRUST state databases. Two nearby sites to the south were identified on the IMD, UST, LUST TRUST, and LUST state databases. One nearby





site to the east was identified on the IMD, LUST TRUST, and LUST state databases. One nearby site to the west was identified on the RCRA NonGen/NLR federal database and the DRYCLEANERS state database. Please see Sections 5.1.1 and 5.1.2 of this report for additional information regarding the Property, the adjacent sites to the north and south and the nearby sites to the south, east, and west.

F&R has performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM Practice E 1527-13 of the College Street and Church Street Tract located at 104, 108, 118, 206, 210, and 307 College Street and 108 and 205 Church Street in Pineville, NC, the Property. Any exceptions to, or deletions from, this practice are described in Section 9.0 of this report. This assessment has revealed evidence of the following RECs in association with the Property.

- Petroleum impacted soils were encountered during a Geotechnical Engineering Investigation performed by F&R on the southwestern portion of the Property (307 College Street) in March 2021. Olfactory evidence of petroleum contamination was detected during drilling operations and subsequent classification of soils collected from one soil boring (B-1) which was advanced to a depth of approximately thirty feet below ground surface (bgs). Soil boring B-1 is located on the northern side of the portion of the Property within the area of the building footprint of a proposed mixed used development. The observed petroleum impacted soils on the Property is considered a REC.
- A suspect underground oil/water separator system (OWS) was observed on the Property and is located along the northern side of the three-bay garage utilized by the Pineville Volunteer Fire and Rescue Department. According to Captain Brantley Stallings with the department, the previous Fire Chief had indicated that the suspect pit was a former OWS; however, records documenting the historical use of an OWS on the Property were not available. F&R observed the interior of the pit. Visual indications of equipment associated with an OWS were not observed. In addition, visual observations of the interior of the suspect OWS did not reveal evidence of fluids. The Pineville Volunteer Fire and Rescue Department has operated on the Property since 1969. Based upon the length of time the Fire Department has operated on the Property (52 years) and the lack of information, the suspect OWS is considered a REC. F&R recommends the removal of the suspect OWS. If impacted soils are encountered, additional assessment may be warranted.
- Shops on the Main, located adjacent to the southwest of the Property and topographically up-gradient, was listed on the LUST and IMD state databases. The site previously operated as a filling station and contained monitoring wells, indicative of groundwater contamination. An unknown amount of USTs with unknown contents were removed before registration requirements were set forth by the NCDEQ. Soil and groundwater were reported to be contaminated on July 23, 1992. According to a Conditional Notice of No Further Action notice prepared by the NCDEQ and dated July 9, 2019, a Notice of Residual Petroleum was recorded for the site on June 4, 2019 stating that groundwater contamination exceeds NCAC 2L Groundwater Quality Standards. Additional information regarding specific contaminants and concentrations was not available because the responsible party, Shops on the Main, is a dissolved corporation. The incident was closed out on September 5, 2019. Based on the close proximity to the Property (adjacent to the southwest), and the lack of information regarding remaining contaminant concentrations in groundwater, this incident represents a REC with respect to the Property.



- Tillett Chemical, Inc., historically located on the adjacent parcels north and west of the Property, was listed on the LUST, SHWS, IMD, and UST state databases. Twelve groundwater monitoring wells were installed in 1997 to assess groundwater contamination at the site and the surrounding areas. Groundwater at the site has been documented to be contaminated primarily with TCA and chemical degradation products (1,1-dichloroethane, 1,1-dichloroethene, methylene chloride, and vinyl chloride) with concentrations ranging from below detectable levels to 1,338 micrograms per liter (ug/L). Chlorinated solvents (1,1-dichloroethane, 1,1-dichloroethene, vinyl chloride, methylene chloride, and 1,1-trichloroethane) were detected above respective NC 2L Groundwater Quality Standards in four groundwater monitoring wells (MW-8, MW-11, MW-6, and DW-1) located closest to the western Property boundary (in the vicinity of 307 College Street and 210 College Street) during groundwater sampling events performed in 1997. In addition, three groundwater monitoring wells (MW-1, MW-2, and MW-3) were historically located on the northwestern portion of the Property. Laboratory analysis of groundwater sampled from MW-3 (on the Property) in August 1997 detected 1,1,1-dichloroethene at a concentration of 58.4 (ug/L), exceeding the NC 2L Standard (7 ug/L). In addition, two LUST incidents have been reported at the site. Pollution Incident Number 12576 was opened on June 28, 1994 following the closure of a 4,000-gallon methanol UST. Pollution Incident Number 8631 was opened following the removal of a 1,500-gallon Varsol UST and a 5,000-gallon heating oil UST in November 1989. A Limited Site Assessment (LSA) in January 2003 identified concentrations of benzene; ethylbenzene; xylenes; VPH C5-C8 aliphatics; VPH C9-C10 aromatics; EPG C9-C18 aliphatic hydrocarbons; EPH C19-C36 aliphatic hydrocarbons; and EPH C11-C12 aromatic hydrocarbons above respective NC 2L Groundwater Quality standards in groundwater sampled. The NC DEQ recorded a Notice of Residual Petroleum (NORP) on the site on June 4, 2019. The NC DEQ issued a Conditional No Further Action determination letter on June 4, 2019 following the filing of the NORP. The NFA letter indicates that groundwater contamination exceeds the NC 2L Groundwater Quality Standards and soil contamination exceeds the residential maximum soil contaminant concentrations (MSCCs) and the site is only suitable for industrial commercial use or restricted residential use. Documented groundwater contaminated with chlorinated solvents above NC 2L Groundwater Quality Standards on the Property and both chlorinated solvents and petroleum related compounds (above NC 2L Groundwater Quality Standards) less than 100 feet from the western Property boundary is considered a REC.

F&R recommends a subsurface assessment be completed to assess the identified RECs and to determine if a vapor encroachment condition (VEC) exists on the Property.

The following HRECs were identified:

- The Property (Pineville Volunteer Fire and Rescue Department, 108 Church Street) was listed on the LUST, IMD, and UST state databases. Pollution Incident Number 21099 was opened following the removal of a 2,000-gallon diesel UST on June 3, 1994. Three soil samples collected from the tank pit and the area of the fuel dispenser were analyzed for Total Petroleum Hydrocarbons (TPH) and Total Petroleum Fuel Hydrocarbons (TPFH) by EPA Methods 5030 and 3550 (i.e. TPH-GRO and TPH-DRO, respectively). Laboratory analysis of the soil sample collected in the area of the fuel dispenser detected TPH-GRO at a concentration of 158 mg/kg, exceeding the regulatory action limit of 40 ppm (at the time of reporting). A groundwater monitoring well (MW-1) was installed in the area of the former dispenser pump on June 25, 2007. Volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), extractable petroleum



hydrocarbons (EPH), and volatile petroleum hydrocarbons (VPH) were not detected above laboratory reporting limits in the soil samples analyzed. Laboratory analysis of groundwater sampled did not detect target compounds above laboratory reporting limits. NCDENR (aka NC DEQ) determined that no further action was warranted. Pollution Incident Number 21099 was closed with a NFA determination letter on September 20, 2007. Based on the removal of the source and case closure with a NFA determination letter, the former 2,000-gallon diesel UST is considered an HREC. Additional assessment is not warranted.

- The Property (Pineville Electric Department and Pineville Telephone Department, 118 College Street) was listed on the UST state database. A 1,000-gallon diesel UST was removed from the Property on April 30, 1994. Laboratory analysis of two soil samples collected from the tank pit detected concentrations of TPH and TPFH below sample detection limits (BDL). Based on the soil sample results, the NC DEHNR (aka NC DEQ) issued a NFA determination letter on September 13, 1996. In addition, a 10,000-gallon gasoline UST was permanently closed and removed from the ground on March, 17, 1998. Two soil samples collected from the bottom of the tank excavation were analyzed for VOCs, TPH, methyl tert-butyl ether (MTBE) and isopropyl ether (IPE). Laboratory analytical results indicated detections of petroleum compounds below laboratory detection limits. The North Carolina Department of Environment and Natural Resources (NCDENR) (aka NC DEQ) issued a No Further Action (NFA) determination letter on June 22, 1998. Based on the NFA determinations, removal of the sources, and soil contamination below laboratory detection limits, the former USTs are considered an HREC. Additional assessment is not warranted.

The following de minimis conditions were identified:

- An unlabeled 55-gallon drum was observed adjacent to the 1,000-gallon diesel AST on the southeastern portion of the Property which is utilized by the Pineville Fire and Rescue Department. The contents of the drum are unknown and fire personnel were not available to provide F&R with information regarding the contents of the drum. Obvious evidence of spills or staining was not observed in the area of the drum. The presence of an unlabeled drum with unknown contents on the Property is considered a de minimis condition. F&R recommends identification of the drum contents and proper disposal in accordance with local, state, and federal regulations.
- A hydraulic-electric lift was observed on-site and is located on the loading dock on the northern side of the US Post Office building on the Property. The hydraulic-electric lift utilizes an above-ground hydraulic fluid reservoir. However, there appears to be a partially subgrade area located immediately below the lift which may be indicative of a former in-ground hydraulic lift. This lift was presumably installed in 1974 when the building was constructed. Based upon the anticipated date of installation the lift is presumed to be PCB containing. The lift was observed to be operational during F&R's Property reconnaissance and obvious evidence of leaks or spills associated with the lift were not observed or reported. Based upon the length of time the lift has been in use (46 years), anticipated small size of the hydraulic reservoir (less than 25 gallons), and localized area that would have been impacted by PCB containing fluids in a historical release, the suspect PCB containing hydraulic lift is considered a de minimis condition. F&R recommends the hydraulic lift be removed prior to redevelopment of the Property. If impacted soils are encountered, additional assessment may be warranted.



The following business environmental risks were identified:

- Obvious evidence of damaged friable asbestos was not identified. However, based upon the dates of construction (1969, 1974, 1980, 1985, 1994), it is possible that friable and non-friable asbestos containing materials are present on-site. Prior to renovation or demolition of a structure, the facility or affected portion of the facility must be inspected for asbestos per EPA's National Emissions Standard for Hazardous Air Pollutants (40 CFR Part 61). F&R recommends that an asbestos survey be performed prior to renovation or demolition of the buildings on the Property.
- Obvious visual indications of damaged painted materials were not observed. However, suspect painted areas that may contain lead were observed. Based upon the dates of construction (1969, 1974), lead-based paint may be present on the Property. Based upon the current non-residential usage of the Property, lead-based paint is not anticipated to be an environmental concern in an intact state. However, OSHA regulates lead exposure to workers in a construction environment and it is the contractor's responsibility to comply with OSHA requirements during construction, renovation, or demolition activities which would disturb painted surfaces.

## 2.0 INTRODUCTION

### 2.1 Purpose

The purpose of this assessment is to determine whether activities are occurring, or may have occurred on or near the Property, that may be considered:

- Recognized environmental conditions - the presence or likely presence of any hazardous substance or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.
- Controlled recognized environmental conditions - a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).
- Historical recognized environmental conditions - a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).
- De minimis conditions - a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis conditions are not recognized environmental conditions nor controlled recognized environmental conditions.





April 27, 2021

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Re: **Findings and Estimated Additional Assessment Costs Memo**  
**College Street and Church Street Tract Phase I Environmental Site Assessment**  
104, 108, 118, 206, 210, and 307 College Street and 108 and 206 Church Street  
Pineville, NC 28134  
F&R Project No. 59Z-0092

Mr. Sherard,

F&R prepared a Phase Environmental Site Assessment at the College Street and Church Street Tract located at 104, 108, 118, 206, 210, and 307 College Street and 108 and 206 Church Street in Pineville, North Carolina, submitted under separate cover on April 9, 2021. The following recognized environmental conditions and estimated costs were identified:

- Petroleum impacted soils were encountered during a Geotechnical Engineering Investigation performed by F&R on the southwestern portion of the Property (307 College Street) in March 2021. Olfactory evidence of petroleum contamination was detected during drilling operations and subsequent classification of soils collected from one soil boring (B-1) which was advanced to a depth of approximately thirty feet below ground surface (bgs). Soil boring B-1 is located on the northern side of the portion of the Property within the area of the building footprint of a proposed mixed used development. The observed petroleum impacted soils on the Property is considered a REC.
- A suspect underground oil/water separator system (OWS) was observed on the Property and is located along the northern side of the three-bay garage utilized by the Pineville Volunteer Fire and Rescue Department. According to Captain Brantley Stallings with the department, the previous Fire Chief had indicated that the suspect pit was a former OWS; however, records documenting the historical use of an OWS on the Property were not available. F&R observed the interior of the pit. Visual indications of equipment associated with an OWS were not observed. In addition, visual observations of the interior of the suspect OWS did not reveal evidence of fluids. The Pineville Volunteer Fire and Rescue Department has operated on the Property since 1969. Based upon the length of time the Fire Department has operated on the Property (52 years) and the lack of information, the suspect OWS is considered a REC. F&R recommends the removal of the suspect OWS. If impacted soils are encountered, additional assessment may be warranted.





- Shops on the Main, located adjacent to the southwest of the Property and topographically up-gradient, was listed on the LUST and IMD state databases. The site previously operated as a filling station and contained monitoring wells, indicative of groundwater contamination. An unknown amount of USTs with unknown contents were removed before registration requirements were set forth by the NCDEQ. Soil and groundwater were reported to be contaminated on July 23, 1992. According to a Conditional Notice of No Further Action notice prepared by the NCDEQ and dated July 9, 2019, a Notice of Residual Petroleum was recorded for the site on June 4, 2019 stating that groundwater contamination exceeds NCAC 2L Groundwater Quality Standards. Additional information regarding specific contaminants and concentrations was not available because the responsible party, Shops on the Main, is a dissolved corporation. The incident was closed out on September 5, 2019. Based on the close proximity to the Property (adjacent to the southwest), and the lack of information regarding remaining contaminant concentrations in groundwater, this incident represents a REC with respect to the Property.
- Tillett Chemical, Inc., historically located on the adjacent parcels north and west of the Property, was listed on the LUST, SHWS, IMD, and UST state databases. Twelve groundwater monitoring wells were installed in 1997 to assess groundwater contamination at the site and the surrounding areas. Groundwater at the site has been documented to be contaminated primarily with TCA and chemical degradation products (1,1-dichloroethane, 1,1-dichloroethene, methylene chloride, and vinyl chloride) with concentrations ranging from below detectable levels to 1,338 micrograms per liter (ug/L). Chlorinated solvents (1,1-dichloroethane, 1,1-dichloroethene, vinyl chloride, methylene chloride, and 1,1-trichloroethane) were detected above respective NC 2L Groundwater Quality Standards in four groundwater monitoring wells (MW-8, MW-11, MW-6, and DW-1) located closest to the western Property boundary (in the vicinity of 307 College Street and 210 College Street) during groundwater sampling events performed in 1997. In addition, three groundwater monitoring wells (MW-1, MW-2, and MW-3) were historically located on the northwestern portion of the Property. Laboratory analysis of groundwater sampled from MW-3 (on the Property) in August 1997 detected 1,1,1-dichloroethene at a concentration of 58.4 (ug/L), exceeding the NC 2L Standard (7 ug/L). In addition, two LUST incidents have been reported at the site. Pollution Incident Number 12576 was opened on June 28, 1994 following the closure of a 4,000-gallon methanol UST. Pollution Incident Number 8631 was opened following the removal of a 1,500-gallon Varsol UST and a 5,000-gallon heating oil UST in November 1989. A Limited Site Assessment (LSA) in January 2003 identified concentrations of benzene; ethylbenzene; xylenes; VPH C5-C8 aliphatics; VPH C9-C10 aromatics; EPG C9-C18 aliphatic hydrocarbons; EPH C19-C36 aliphatic hydrocarbons; and EPH C11-C12 aromatic hydrocarbons above respective NC 2L Groundwater Quality standards in groundwater sampled. The NC DEQ recorded a Notice of Residual Petroleum (NORP) on the site on June 4, 2019. The NC DEQ issued a Conditional No Further Action determination letter on June 4, 2019 following the filing of the NORP. The NFA letter indicates that groundwater contamination exceeds the NC 2L Groundwater Quality Standards and soil contamination exceeds the residential maximum soil contaminant concentrations (MSCCs) and the site is only suitable for industrial commercial use or restricted residential use. Documented groundwater contaminated with chlorinated solvents above NC 2L Groundwater Quality Standards on the Property and both chlorinated solvents and petroleum related compounds (above NC 2L Groundwater Quality Standards) less than 100 feet from the western Property boundary is considered a REC.



F&R recommends a subsurface assessment be completed to assess the identified RECs and to determine if a vapor encroachment condition (VEC) exists on the Property. The subsurface assessment is anticipated to include soil, soil gas, sub-slab vapor, and groundwater sampling and the cost is estimated to range from \$20,000-\$32,000. A formal proposal outlining a sampling plan and anticipated costs and can be provided if requested.

Based on the findings of the subsurface assessment, additional assessment may be warranted. Based on the findings of the Phase I ESA, it is likely that the Property would be eligible for the North Carolina Brownfields Program (NCBP) if the Prospective Developer (PD) elects to pursue that route. Note that the PD (i.e., the applicant) cannot have contributed to the contamination at the Property. The ownership of the Property can be transferred prior to applying for the NCBP, and the new owner would complete the application, or the Property can be transferred after the Property is accepted into the Program with notification of the NCBP and completing the necessary forms.

The State of North Carolina does not have funds available for the Brownfields Program; however, eligible sites receive tax incentives on future improvements to the Property. Federal Brownfields Grants are available to municipalities for eligible projects. The initial step is to submit a Brownfields Eligibility Application. There are two tracks in the NCBP. Additional details on the NCBP can be found at: <https://deg.nc.gov/about/divisions/waste-management/brownfields-program> and detailed information regarding the procedure, potential timeframe, and approximate costs associated with submitting the Property into the NCBP is included as an attachment.

The following de minimis condition was identified:

- A hydraulic-electric lift was observed on-site and is located on the loading dock on the northern side of the US Post Office building on the Property. The hydraulic-electric lift utilizes an above-ground hydraulic fluid reservoir. However, there appears to be a partially subgrade area located immediately below the lift which may be indicative of a former in-ground hydraulic lift. This lift was presumably installed in 1974 when the building was constructed. Based upon the anticipated date of installation the lift is presumed to be PCB containing. The lift was observed to be operational during F&R's Property reconnaissance and obvious evidence of leaks or spills associated with the lift were not observed or reported. Based upon the length of time the lift has been in use (46 years), anticipated small size of the hydraulic reservoir (less than 25 gallons), and localized area that would have been impacted by PCB containing fluids in a historical release, the suspect PCB containing hydraulic lift is considered a de minimis condition. F&R recommends the hydraulic lift be removed prior to redevelopment of the Property. The cost to remove the lift is estimated to range from \$8,000-\$15,000.

If impacted soils are encountered, additional assessment may be warranted. Additional assessment could include the excavation and proper disposal of impacted soils in accordance with local, state, and federal regulations the cost is estimated to range from \$8,000-\$20,000. Additional assessment may be able to be completed via the North Carolina Brownfields Program.



The following business environmental risks were identified:

- Obvious evidence of damaged friable asbestos was not identified. However, based upon the dates of construction (1969, 1974, 1980, 1985, 1994), it is possible that friable and non-friable asbestos containing materials are present on-site. Prior to renovation or demolition of a structure, the facility or affected portion of the facility must be inspected for asbestos per EPA's National Emissions Standard for Hazardous Air Pollutants (40 CFR Part 61). F&R recommends that an asbestos survey be performed prior to renovation or demolition of the buildings on the Property. The anticipated cost is estimated to range from \$12,000-\$15,000.
- Obvious visual indications of damaged painted materials were not observed. However, suspect painted areas that may contain lead were observed. Based upon the dates of construction (1969, 1974), lead-based paint may be present on the Property. Based upon the current non-residential usage of the Property, lead-based paint is not anticipated to be an environmental concern in an intact state. However, OSHA regulates lead exposure to workers in a construction environment and it is the contractor's responsibility to comply with OSHA requirements during construction, renovation, or demolition activities which would disturb painted surfaces. The anticipated cost is estimated to range from \$7,000-\$12,000.

In addition, the following items were identified which do not require additional assessment:

- The Property (Pineville Volunteer Fire and Rescue Department, 108 Church Street) was listed on the LUST, IMD, and UST state databases. Pollution Incident Number 21099 was opened following the removal of a 2,000-gallon diesel UST on June 3, 1994. Three soil samples collected from the tank pit and the area of the fuel dispenser were analyzed for Total Petroleum Hydrocarbons (TPH) and Total Petroleum Fuel Hydrocarbons (TPFH) by EPA Methods 5030 and 3550 (i.e. TPH-GRO and TPH-DRO, respectively). Laboratory analysis of the soil sample collected in the area of the fuel dispenser detected TPH-GRO at a concentration of 158 mg/kg, exceeding the regulatory action limit of 40 ppm (at the time of reporting). A groundwater monitoring well (MW-1) was installed in the area of the former dispenser pump on June 25, 2007. Volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), extractable petroleum hydrocarbons (EPH), and volatile petroleum hydrocarbons (VPH) were not detected above laboratory reporting limits in the soil samples analyzed. Laboratory analysis of groundwater sampled did not detect target compounds above laboratory reporting limits. NCDENR (aka NC DEQ) determined that no further action was warranted. Pollution Incident Number 21099 was closed with a NFA determination letter on September 20, 2007. Based on the removal of the source and case closure with a NFA determination letter, the former 2,000-gallon diesel UST is considered a Historical Recognized Environmental Condition (HREC). Additional assessment is not warranted.
- The Property (Pineville Electric Department and Pineville Telephone Department, 118 College Street) was listed on the UST state database. A 1,000-gallon diesel UST was removed from the Property on April 30, 1994. Laboratory analysis of two soil samples collected from the tank pit detected concentrations of TPH and TPFH below sample detection limits (BDL). Based on the soil sample results, the NC DEHNR (aka NC DEQ) issued a NFA determination letter on September 13, 1996. In addition, a 10,000-gallon gasoline UST was permanently closed and removed from the



ground on March, 17, 1998. Two soil samples collected from the bottom of the tank excavation were analyzed for VOCs, TPH, methyl tert-butyl ether (MTBE) and isopropyl ether (IPE). Laboratory analytical results indicated detections of petroleum compounds below laboratory detection limits. The North Carolina Department of Environment and Natural Resources (NCDENR) (aka NC DEQ) issued a No Further Action (NFA) determination letter on June 22, 1998. Based on the NFA determinations, removal of the sources, and soil contamination below laboratory detection limits, the former USTs are considered an HREC. Additional assessment is not warranted.

- An unlabeled 55-gallon drum was observed adjacent to the 1,000-gallon diesel AST on the southeastern portion of the Property which is utilized by the Pineville Fire and Rescue Department. The contents of the drum are unknown and fire personnel were not available to provide F&R with information regarding the contents of the drum. Obvious evidence of spills or staining was not observed in the area of the drum. The presence of an unlabeled drum with unknown contents on the Property is considered a de minimis condition. F&R recommended identification of the drum contents and proper disposal in accordance with local, state, and federal regulations. However, F&R received a follow-up telephone call from Jason M. Klemowicz, Deputy Fire Chief, with the Pineville Fire Department on April 12, 2021. Mr. Klemowicz stated that the 55-gallon drum contains water with residual amounts of diesel fuel. Mr. Klemowicz indicated that the drum is used to containerize and transport diesel fuel (obtained from the on-site diesel AST) to controlled burn sites, and that the fuel is used as an ignition source for controlled burns. Based on the reported contents of the drum with water with residual amounts of diesel fuel and the continued use of the 55-gallon drum to containerize and transport diesel fuel to controlled burn sites, identification of the contents and disposal of the 55-gallon drum is not warranted.

Should you have any questions concerning this letter or the Brownfields program, please contact the undersigned at 864.434.0954. We appreciate the opportunity to serve as your Environmental Consultant on this project.

Sincerely,  
**FROEHLING & ROBERTSON, INC.**

A handwritten signature in black ink, appearing to read 'Andréa LeCroy', written in a cursive style.

Andréa LeCroy  
Environmental Scientist

A handwritten signature in black ink, appearing to read 'Alyssa S. Budlong, P.G.', written in a cursive style.

Alyssa S Budlong, PG  
Practice Leader, Due Diligence Services

Attachments:      Brownfields Agreement Process Flowchart





# FROEHLING & ROBERTSON

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There are two (2) tracks in the North Carolina Brownfields Program. The initial step is to submit a Brownfields Eligibility Application. Additional details on the NCBP can be found at: <https://deq.nc.gov/about/divisions/waste-management/brownfields-program> and we have also attached the NCBP Agreement Process Flowchart for reference. F&R recommends retaining an attorney to assist with the Brownfields Application Process and negotiation of the Agreement (F&R can recommend several environmental attorneys). The following table outlines the steps, approximate timeline, and approximate costs for each track. The timeframe in the first row of the table is the overall timeframe, and the remaining steps can be conducted concurrently:

Step	Costs	Timeframe
NC Brownfield Program (NCBP) Process and Fee	<p><b>Standard Track: \$8,000</b> (\$2,000 on determination of eligibility, and \$6,000 with the Brownfields Agreement.</p> <p><b>Redevelop Now Track: \$30,000</b> with the application (refundable if the Property is determined to be ineligible for the NCBP).</p>	<p><b>Standard Track: 18 months to 2 years</b> depending upon the extent of additional assessment required, the promptness of responses to NCBP requests, and negotiations with the NCBP.</p> <p><b>Redevelop Now Track: 6 months to 18 Months</b> depending upon the extent of additional assessment required, the promptness of responses to NCBP requests, and negotiations with the NCBP.</p>
Submit Eligibility Application and Receive letter of Eligibility	F&R Assistance if requested: \$1,500	Approximately 30 Days
Submittal of existing data and additional assessment. A workplan will be required to be submitted and approved prior to commencing assessment if necessary.	It is likely some additional assessment will be required. The cost range for this will depend upon the extent of the existing data available and NCBP requirements. <b>These costs can be estimated to range from \$12,000 to \$35,000.</b> (This includes the preparation of the workplan).	30 to 90 Days dependent upon extent of assessment and site access.

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<p>NCBP Review of data and preparation of Draft Brownfields Agreement.</p>	<p>N/A (included in NCBP fees)</p>	<p><b>Standard Track: 3 to 12 months</b> (depending upon NCBP workload, the extent of the assessment, and negotiations with PD)</p> <p><b>Redevelop Now Track: 2 to 6 months</b> (depending upon NCBP workload, the extent of the assessment, and negotiations with PD).</p>
<p>Preparation of Brownfields Plat</p>	<p>This will be completed by your surveyor and will be dependent upon their costs</p>	<p><b>1 to 3 months</b> (This can be completed while the NCBP is preparing the Draft Brownfields Agreement). Several sets of revisions may be required based on NCBP review.</p>
<p>Brownfields Agreement Negotiations</p>	<p>F&amp;R Costs: \$1,000 to \$2,000 depending upon extent of negotiations.</p> <p>Attorney Costs: TBD</p>	<p><b>Standard Track: 3 to 12 months</b> (depending upon NCBP workload, and the extent of negotiations).</p> <p><b>Redevelop Now Track: 1 to 6 months</b> (depending upon NCBP workload, and the extent of negotiations).</p>
<p>Preparation of Environmental Management Plan (EMP)</p>	<p>F&amp;R Costs: \$2,000 to \$3,500</p>	<p><b>Approximately 1 to 3 months</b> (This can be completed while the NCBP is preparing the Draft Brownfields Agreement). Several sets of revisions may be required based on NCBP review.</p>
<p>Soil Disposal Arrangements (if required). If changes to site grading will result in the necessity to remove contaminated soils from the Property, they will need to go to an approved facility or another</p>	<p>TBD (if necessary)</p>	<p><b>~ 2 to 4 weeks</b> (if necessary), this can be conducted while other phases are ongoing.</p>



approved Brownfields site		
Design of Controls and preparation of Vapor Mitigation Plan if Required. This will depend upon the requirements of the Brownfield Agreement and the planned use. This is dependent upon if a vapor barrier or mitigation system will be required as well depending upon the findings of Additional Assessment and the NCBP's conclusions.	<p><b>F&amp;R Costs (if required): \$2,500 to \$8,000</b> (design, oversight and testing, and reporting)</p> <p>Vapor Barrier or Mitigation System costs (if required): TBD</p> <p>The costs to install a barrier or system could range from \$4,000 to \$65,000 depending upon the levels encountered and the development plans</p>	<p><b>Standard Track: 2 to 5 months</b> (depending upon NCBP workload, and the extent of NCBP review).</p> <p><b>Redevelop Now Track: 1 to 2 months</b> (depending upon NCBP workload, and the extent of NCBP review).</p>
Public Notice	N/A	30 Days
Confirmation Testing (if required) and final Report	<p><b>F&amp;R Costs: \$5,000 to \$20,000</b> depending upon extent of confirmation testing required (if any).</p>	<p><b>Standard Track: 2 to 5 months</b> (depending upon NCBP workload, and the extent of NCBP review).</p> <p><b>Redevelop Now Track: 1 to 2 months</b> (depending upon NCBP workload, and the extent of NCBP review).</p>

Please note that you can conduct some phases concurrently. The Brownfields Plat, and EMP can be prepared while the NCBP is reviewing the other documents. If a vapor mitigation system is required after NCBP review and receipt of the draft Brownfields Agreement, F&R can develop a draft plan while the NCBP is reviewing amendments to the draft plan. Additionally the NCBP generally allows demolition of structures, and installation of some structures and features while they are preparing the draft Agreement and during the review phase providing that they are notified and approve of it in advance, and contaminated materials will not be moved or encountered.

The Property can be transferred with the Brownfields protections. Notification of the proposed transfer of the Property is required to the NCBP. An annual form is required to be submitted indicating that the conditions of the Brownfields Agreement are being maintained and that there was no change in use or ownership at the Property.