



May 20, 2025

Town of Robbins
101 N. Middleton Street
Robbins, NC 27325

Attention: Mr. Clint Mack
Town Manager/CZO

via email: manager@townofrobbins.com

Reference: **Brownfields Consulting Services**
Work Plan, Limited Soil Gas Assessment, and Reporting
Robbins Mills Brownfield No. 17054-13-063
Robbins, Moore County, North Carolina
S&ME Project No. 25050374

Dear Mr. Mack:

S&ME, Inc. (S&ME) is submitting this proposal for Brownfield Environmental Support for the above referenced project. This proposal provides our understanding of the project, our proposed Scope of Services and the associated fees. Our Agreement for Services (Form AS-071) is attached and is incorporated as part of this proposal.

◆ Project Background

Project information has been developed from communications with Mr. Clint Mack of the Town of Robbins and Jordan Thompson of the State of North Carolina Department of Environmental Quality (DEQ) Brownfields Project Manager. Environmental site investigation documents related to the Site were also reviewed on the DEQ Laserfiche Online Document Database. The following documents were reviewed on the DEQ Laserfiche site and are summarized below.

Phase I Environmental Site Assessment

A Phase I Environmental Site Assessment (ESA) was conducted on the Former Robbins Mill property located at 200 S. Kennedy Street in Robbins, NC (hereinafter referred to as the "Site") by Cardno, Inc (Cardno) in September of 2013.

The following site information and recognized environmental conditions (REC) were reported:

- The Site was operated as a textile mill from prior to 1963 through 2008. The mill was destroyed by fire in August 2008.
- The Site is 12.19 acres in size.
- Two above ground storage tanks (AST) identified as a recognized environmental concern (REC);
- Drums of unknown contents were historically stored onsite however, no drums were observed during the Phase I ESA;
- Potential floor drains and sumps, identified as a REC.



- It was noted that due to the age of the mill and suspect materials observed in the debris piles, the presence of asbestos containing material (ACM) and lead based paint was highly likely.

Phase II Environmental Site Assessment

A Phase II ESA was conducted on the Site in May 2015 by Cardno. The following is a summary of the Phase II ESA.

- A total of 29 soil borings were advanced and sampled across the property.
- Two soil samples per boring were analyzed for one or more of the following: volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver), polychlorinated biphenyls (PCBs) and diesel range organics (DRO)/gasoline range organics (GRO).
- VOCs, SVOCs and metals were detected in one or more soil samples submitted for analysis.
- Five temporary groundwater monitoring wells were installed and sampled for VOCs, SVOCs and PCBs.
- VOCs and metals were detected in one or more groundwater samples submitted for analysis.
- The findings of the Phase II ESA indicated that site soils have been impacted and there are potential exposure risks if the site is developed.

UST Closure Report

A UST Closure Report for the former Robbins Mill – Smokestack Parcel, dated March 31, 2021, was prepared by Cardno for the Town of Robbins. The report details the assessment and closure procedures for two above-ground storage tanks (ASTs) and associated piping that were part of the former Robbins Mill.

- Two fuel oil ASTs (25,000-gallon and 3,200-gallon) were present, with approximately 30 feet of underground piping running from the larger tank to the former boiler room.
- Cardno removed the ASTs and piping as part of the Town of Robbins' EPA Brownfield Cleanup grant. Prior to fieldwork, a Site-specific Quality Assurance Project Plan (QAPP) was prepared and approved by the EPA.
- Soil samples were collected from beneath the product piping and analyzed for TPH GRO/DRO, VOCs, SVOCs, and RCRA metals.
- TPH-DRO was detected above the NCDEQ UST threshold in three of the four samples. Arsenic was detected in all samples above the RSL, while total chromium and benzene were detected slightly above regulatory limits in one sample.
- Cardno recommended no further action (NFA) at the site with a Notice of Residual Petroleum (NORP).

Groundwater Confirmation Sampling

A groundwater assessment report for the Former Robbins Mill – Smokestack AST / Piping Removal site, was conducted by Cardno (now Stantec) in March 2022. The assessment was performed in accordance with EPA guidelines and NCDEQ requirements, under a Brownfields Cleanup Grant to determine if the site's groundwater has been impacted by RECs identified in previous assessments, and to confirm the lack of contaminant migration near a soil boring (RMPL-2) for site closure.

- One temporary monitoring well (RW-1) was installed, and groundwater samples were collected and analyzed for VOCs, SVOCs, VPHs, and EPHs.



- 1,1-Dichloroethene was detected in the groundwater sample, but the concentration was below NC State Groundwater 2L standards.
 - No SVOCs, VPHs, or EPHs were detected above laboratory reporting limits or regulatory standards.
- Based on the sampling results, Stantec (purchased Carnado) indicated that the site can be closed with a Notice of Residual Petroleum (NORP).

◆ Scope Of Services

S&ME proposed the following Scope of Services as the next steps supporting a NCDEQ Brownfields environmental investigation.

Task 1 –Limited Soil Gas Sampling

1.1 – Work Plan, Coordination, and Project Management

On April 25, 2025, a meeting between S&ME and Jordan Thompson of DEQ was held to discuss the soil gas sampling requirements to allow for the development of the site as mixed residential. Based on the conversation, the recommendation of two soil gas samples per acre of site would be appropriate. Prior to conducting an assessment, S&ME will prepare and submit an Assessment Work Plan to the DEQ Brownfields Redevelopment Section (BRS), summarizing the planned additional assessment activities described below. The Assessment Work Plan will be prepared in accordance with the Brownfields Program Work Plan Checklist and submitted to Jordan Thompson for review and approval. Once the Work Plan is approved by NCDEQ, then our field activities will commence.

This task includes administrative provisions for coordinating the completion of the proposed tasks. S&ME will provide project management services including coordination with the Town of Robbins team, regulatory interface with NCDEQ and subcontractor management. In addition, S&ME will:

- Prepare a site-specific Health and Safety Plan (HASP) to comply with currently proposed site activities, in accordance with 29 CFR 1910.120 as required by OSHA.
- Coordinate with a North Carolina-certified laboratory for the proposed analyses.
- Subcontract a NC-certified well driller to conduct drilling and soil sampling if needed.

1.2 –Soil Gas Sampling

Soil gas sampling and assessment will be conducted in general accordance with the following guidance documents:

- NCDEQ Inactive Hazardous Sites Branch (IHSB), *Guidelines for Assessment and Cleanup of Contaminated Sites* (July 2023)
- NCDEQ Division of Waste Management, *Vapor Intrusion Guidance* (March 2018)
- U.S. Environmental Protection Agency (EPA) Region IV Science and Ecosystem Support Division (SESD) *Field Branches Quality System and Technical Procedures* (most recent version)



S&ME proposes to use a Geoprobe® drill rig equipped with a Macro-Core® sampler, or 1-inch direct push rods, to create boreholes and install 24 soil gas implants (SGIs) for the collection of soil gas samples. The SGIs will be installed at the locations shown on the attached **Figure 1**. The targeted depth of each of the SGIs will be approximately two feet above the groundwater table which is anticipated to be between 9 feet and 13 feet below ground surface across the Site. Soil gas samples will be collected in pre-evacuated SUMMA canisters, individually certified clean by the laboratory. Once the soil gas samples are collected, the SUMMA canisters will be shipped under standard chain-of-custody protocol to an accredited laboratory for analysis of VOCs by EPA Method TO-15.

QA/QC Samples

In accordance with NCDEQ Guidelines, one co-located (duplicate) soil gas sample will be collected during the assessment. The quality control duplicate samples will be analyzed for the same constituents as the record samples. SUMMA canisters for both the record samples, and the duplicate sample, will be individually certified and pre-evacuated from the laboratory. Analytical documentation, demonstrating that the individually certified SUMMA canisters are free of the target compounds down to the project reporting limits, will be obtained from the laboratory, and provided in S&ME's report.

1.3 – Assessment Report

After completing sampling Tasks 1.2, and upon receipt of the laboratory analytical reports, S&ME will prepare and submit a letter report, as required by BRS, including the following information, at a minimum:

- Reporting/summary of site work conducted
- Summary of findings and possible recommendations
- Applicable tables and figures summarizing field and laboratory results
- Field notes describing methods used to perform assessment and sampling activities.
- Laboratory analytical results compared to applicable regulatory standards.

S&ME will generate a portable document file (pdf) of the report and issue the letter report via email.

◆ **Exclusions and Limitations**

This scope of service is intended as a limited assessment of soil gas at the site and our services are not intended as a comprehensive assessment to delineate the constituents of concern (COCs) in soil, air, or in groundwater. Without attempting to be a complete list or description of all services or potential services that will be excluded from this proposal and performed by S&ME, the following services are specifically excluded from this proposal:

- Design of vapor intrusion mitigation system (VIMS) or development of corrective action plans.
- Additional assessment NCBP may require once Final Development Plans are available, or after the Assessment Work Plan has been submitted.
- Assessment and remediation services necessary to remove contaminated soil or groundwater, including sampling, lab analysis, or development of specifications.
- Preparation of any documents the DEQ may require, other than those specifically listed. (e.g., final grade sampling and analysis plan, post-construction testing plan, or VIMS effectiveness testing.)



As the project advances, if these services are required, S&ME will prepare change orders to this proposal to provide those services.

The proposed scope of services is based on S&ME's prior experience with the North Carolina Brownfields Program and makes certain assumptions as to the BRS review and what will be required in the Assessment Work Plan. Upon review of the Assessment Work Plan, DEQ may require additional assessment or delineation, which is not included in this proposal.

◆ Client Responsibilities

The Scope of Services, fees and project schedule presented herein are contingent upon the client fulfilling the following responsibilities:

- Execute the attached form AS-071.
- Allow access to the property for the assessment activities.
- Provide S&ME with access to relevant architectural and site development plans.
- Adherence to the Brownfield Agreement/LOE.

◆ Schedule And Fee

S&ME proposes to provide the Scope of Services presented above on a time and materials basis, in accordance with the attached Fee Schedule. S&ME will proceed with the tasks described in this proposal immediately upon receipt of authorization.

Task No.	Task Description	Budget	Schedule to Complete (Following Authorization)
1.1	Work Plan, Coordination, Project Management	\$5,330.00	The Work Plan can be submitted to NCDEQ within two-weeks
1.2	Soil gas implant installations and Soil Gas Sampling (24 locations)	\$27,752.5	Soil gas implants and sampling can be completed within four weeks following approval of the Work Plan
1.3	Assessment Report	\$6,010.00	The report can be submitted within three-weeks following receipt of laboratory analysis
Total Recommended Budget:		\$39,092.50	

Note :

This schedule and fee dependent upon DEQ responses and authorizations. If DEQ does not respond in a timely fashion, the project schedule may be extended. DEQ may require additional sampling and laboratory analysis, resulting in additional fees.

S&ME proposes to provide the Scope of Services presented above on a time and materials basis, in accordance with the Fee Schedule previously established for this project. Based on the scope of services described above, we recommend a budget of approximately **\$39,092.50**. A detailed breakdown of the estimated fees is provided on **Table 1**.



Please note that our fee is dependent on many factors and may be influenced by the actual project schedule or conditions at the site. If the actual project schedule and our number of efforts varies from that assumed, the total fee for our services will also vary. Should additional budget be required, S&ME will submit a request for additional budget to the Town of Robbins prior to exceeding the proposed budget. S&ME requires payment of invoices within 30 days.

◆ Use Of Proposal/Report

This proposal is solely intended for the Basic Services as described in the Scope of Services. The Scope of Services may not be modified or amended, unless the changes are first agreed to in writing by the client and S&ME, Inc. Use of this proposal and corresponding final report is limited to above-referenced project and client. No other use is authorized by S&ME.

◆ Authorization

Our Agreement for Services, Form Number AS-071, is attached and is incorporated as a part of this proposal. Please indicate your acceptance of our proposal by signing the form and returning it to our office. If you elect to accept our proposal by issuing a purchase order, then please reference this proposal number and date. Your purchase order will be an acceptance of our Agreement of Services and an authorization to proceed with the performance of our services. The terms and conditions included in any purchase order shall not apply, as our agreement is for services that are not compatible with purchase order agreements. **If this proposal is transmitted to you via email, and if you choose to accept this proposal by email, your reply email acceptance will serve as your representation to S&ME that you have reviewed the proposal and the associated Agreement for Services (AS-071) and hereby accept both as written.**

◆ Closing

S&ME appreciates the opportunity to be of service to you. If you have any questions regarding the outlined scope of work, or if we may be of any further assistance, please contact the undersigned.

Sincerely,
S&ME, Inc.

A handwritten signature in blue ink, appearing to read 'David Brisson'.

David Brisson PG
Senior Geologist/Project Manager
davidbrisson@smeinc.com

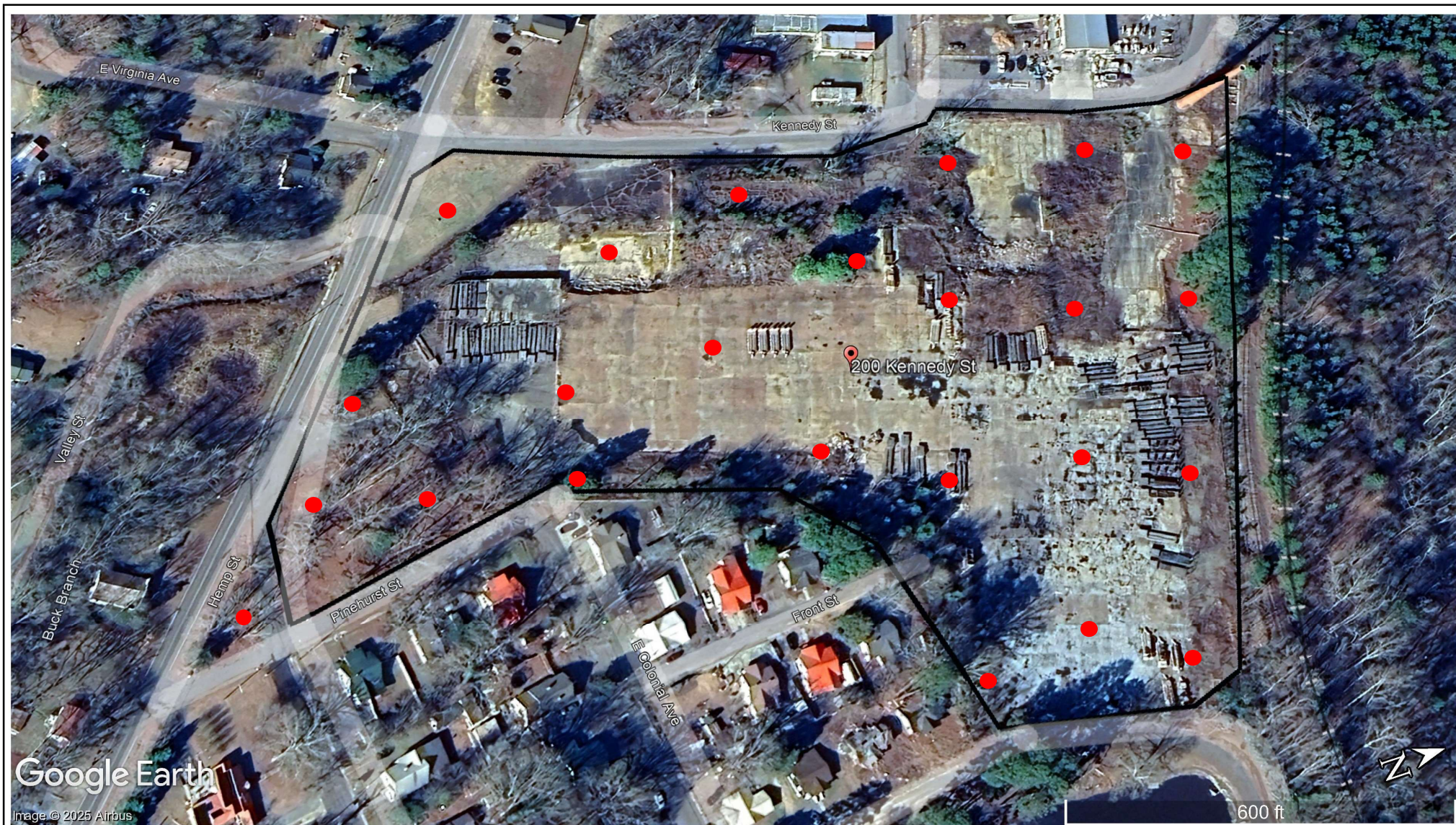
A handwritten signature in blue ink, appearing to read 'Tom Raymond'.

Tom Raymond, PE, PMP, RSM
Principal Engineer/Vice President
traymond@smeinc.com

Attachments: Figure 1 –Proposed Sample Locations
Table 1 – Budget Estimate for Environmental Consulting Services
Agreement for Services (AS-071)

Attachments

Figure



Scale:	Not to scale	  S&ME, Inc. 3201 Spring Forest Road Raleigh, NC 27616 p 919.872.2660 www.smeinc.com	Proposed Soil Vapor Sample Locations Robbins Mill Brownfields Site Robbins, North Carolina	Figure No. 1
Date:	05-15-2025			
Project No.	230505374			

Table



Table 1
BUDGET ESTIMATE for ENVIRONMENTAL CONSULTING SERVICES
Former Robbins Mill, Robins, North Carolina
S&ME Proposal No. 25050374

May 20, 2025

(Prepared By: D. Brisson)

Task 1 - Soil Gas Sampling	Units		Rate	Cost
1.1 - Work Plan , Coordination & Project Management				
Principal Professional	2	hours	\$ 260.00	\$ 520.00
Senior Professional	16	hours	\$ 225.00	\$ 3,600.00
Staff Professional - P2	8	hours	\$ 130.00	\$ 1,040.00
Administrative Support	2	hours	\$ 85.00	\$ 170.00
Task 1.1 Subtotal:				\$ 5,330.00
1.2 - Soil Gas Sampling (24 locations + 2 QA/QC 1 Event)	Units		Rate	Cost
Staff Professional - P2	40	hours	\$ 130.00	\$ 5,200.00
Helium tank	2	day	\$ 145.00	\$ 290.00
Helium Detector	2	day	\$ 150.00	\$ 300.00
PID	2	day	\$ 150.00	\$ 300.00
Field Expendables	2	day	\$ 30.00	\$ 60.00
Mileage	600	miles	\$ 0.70	\$ 420.00
Subcontract Services				
Utility Locating	1	day	\$ 1,115.00	\$ 1,115.00
Driller	1	each	\$ 11,097.50	\$ 11,097.50
Lab: Soil Gas - VOCs (TO-15)	26	each	\$ 345.00	\$ 8,970.00
Task 1.2 Subtotal:				\$ 27,752.50
1.3 - Assessment Report	Units		Rate	Cost
Principal Professional - P6	2	hours	\$ 260.00	\$ 520.00
Senior Professional - P5	8	hours	\$ 225.00	\$ 1,800.00
Staff Professional - P2	24	hours	\$ 130.00	\$ 3,120.00
CAD Operator	4	hours	\$ 120.00	\$ 480.00
Administrative Support	1	hours	\$ 90.00	\$ 90.00
Task 1.3 Subtotal:				\$ 6,010.00
Total Recommended Budget:				\$ 39,092.50

Attachment I –Agreement for Services (AS-071)