

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
BROWNFIELDS CLEANUP  
COOPERATIVE AGREEMENT**

**CLOSEOUT REPORT  
Brownfields Cleanup Grant**



**Grant Recipient Name:** Town of Robbins, North Carolina

**Cooperative Agreement Number:** BF-00D72518-0

**Grant Recipient Information:** Town of Robbins  
Clint Mack  
Town Manager  
1101 North Middleton Street  
Robbins, North Carolina 27325

**Date Submitted:** December 30, 2022

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## ATTACHMENTS

- A. Final DBE (MBW/WBE) Form
- B. Final Financial Status Report
- C. Final Budget
- D. Photos
- E. Disposal Manifests
- F. Air Monitoring Report

## **1.0 Introduction**

### **1.1 Project Description**

Located in the agricultural heart of North Carolina, the small Town of Robbins (Town) had humble beginnings as a railway crossroads. Geography led Robbins to become home to multiple textile mills and manufacturers as it was a hub for farmers to bring cotton to industry as well as a means for industry to ship goods to consumers across the country. The Town, encompassing 1.3 square miles, was home to the Robbins Mill/Milliken Plant which opened in the 1920's and grew to employ hundreds of workers over the next fifty years.

In operation for decades, it was a major blow to the economy and the disposition of numerous employees, when the mill was forced to close in 1990. The property was briefly used by a sign manufacturer during the late 1990s and 2000s; however, that too was forced to close due to rising operational costs and cheaper labor found overseas. What remained of the historic building succumbed to fire in August 2008. Prior to the fire, the mill had been purchased and subsequently leased to a company with plans to manufacture recycled paper products for sale across the nation. The hope and promise of 200 much-needed jobs went up in smoke as the structure burned. The property was left vacant – littered with debris and rubble remaining from the fire – and stood as a significant brownfield negatively impacting the small town of Robbins.

In an effort to address this blighted property and others in similar conditions, the Town applied for and received brownfield assessment funding from the Environmental Protection Agency (EPA). Initial assessment work for the former Robbins Mill was completed utilizing the Town's brownfield grant including Phase I and Phase II Environmental Site Assessments (ESAs). The Phase II identified soil contamination across the site, primarily due to polycyclic aromatic hydrocarbons (PAHs) and heavy metals (chromium and arsenic) at levels above established regulatory thresholds. An Asbestos-Containing Materials (ACM) survey determined that debris piles in specific areas of the subject property contained ACM. In 2016, the Town was awarded two separate hazardous clean-up grants to address contamination at two of the larger parcels at the mill complex – the Northern and Southern. In addition to these parcels, the Phase II also identified significant contamination in and adjacent to the mill's former smokestack. The Phase II noted that within the Smokestack Parcel were two large aboveground storage tanks (ASTs) containing fuel oil and soils in the area have been impacted from PAHs, likely from years of burning fuel in the mill boilers and also a significant amount of building debris suspected of containing ACM. The Smokestack Parcel is the subject of this cleanup project and the next piece of the redevelopment puzzle to be addressed.

The Town addressed the areas of contamination described above with funding from this grant. The mill complex is centrally located in the heart of the small town, and the cleanup of the Smokestack Parcel is a key piece to the overall redevelopment of

the former mill complex and to the revitalization of this distressed community. Residents of this area have called for improved access to affordable housing, new industry that would afford residents the jobs they so desperately need, and a variety of commercial services many other wealthier areas of the County take for granted: grocery stores, health care, banks, and green space. Residents have been particularly interested in saving the historic smokestack and potentially developing a historical display to pay homage to significant role the mill played in the Town's history. The cleanup activities completed under this project is helping to advance the redevelopment efforts of this historical property.

## 1.2 Environmental Results: Outputs/Outcomes

The Town tracked the grant's progress and success by reporting the outputs and outcomes to EPA in quarterly reports. Additionally, the EPA's online Assessment Cleanup and Redevelopment Exchange System (ACRES) was utilized to track site cleanup (outputs). Further, the Town worked closely with its assigned EPA Region 4 Project Officer and the North Carolina Department of Environmental Quality brownfield project manager, meeting by phone and corresponding by email to review progress of the project and to ensure that the terms and conditions of the grant were met properly.

Outputs: The outputs, items produced include:

- Community Involvement Plan – January 2019
- Number of Public Meetings Held – 3
  - One meeting was held prior to the grant application to notify the public (33 people in attendance) that the Town would be applying for the grant and requested public comments on the ABCA and the grant application. No comments were received.
  - A public kick-off meeting was held on October 2, 2018 (15 people in attendance).
  - A public meeting was held on August 13, 2019 to provide the public updates on the planned cleanup activities at the site.
  - A post cleanup project update was presented at the Town Board's public meeting on November 18, 2021..
- Final Cleanup Report – December 2022

Outcomes: The outcomes, results or consequences, of the grant include the minimization of public health exposure to the contamination across the site from the cleanup, tracking progress toward redevelopment, efforts toward sustainable redevelopment, and information on leveraging of the grant funding. Outcomes include:

- Number of Attendees at Public Meeting
  - DATE - Pre cleanup grant application and notification of ABCA – 33;
  - October 2, 2018 – kick-off meeting – 15;

August 13, 2019 – public meeting – 8; and,  
November 18, 2021 – Town Board Meeting – 10;

- Number of Public Inquiries Received – 0;
- Contract with Remediation Contractors – October 30, 2018;
- Abatement and disposal of asbestos-containing materials and debris – February 12, 2019;
- Above Ground Storage Tank and contaminated soil removal and disposal – March 31, 2021;
- Jobs Leveraged and/or Created – 4 employees from Elevated Environmental, the asbestos remediation contractor, and 2 employees from KTF Services, the non-ACM debris relocation contractor, worked during the cleanup of the Smokestack Parcel; and,
- Tax Impact of Redeveloped Property – Since the property is owned by the Town and is anticipated to become a park, it is not anticipated to generate tax revenue. However, it will provide greenspace and access for residents and visitors to the area to learn about the history of the mill. Hopefully, this cleanup will improve the surrounding neighborhood, increasing property values, and encouraging more economic activity in the area.

### **1.3 Organizational Structure and Responsibilities**

The Town Manager, Mr. Clint Mack, served as the project manager for the project, after taking over for the previous Town Manager, Mr. David Lambert. Due to the technical nature of the project, The Town sought the services of an experienced, qualified brownfield consulting group through a competitive bid process per 40 CFR 31.36. Through its Request for Qualifications (RFQ) process, the Town hired Cardno, now Stantec (Cardno) to handle the project management, community involvement, cleanup planning, and cleanup oversight. Cardno also completed the AST removal and required closure sampling. Through a Request for Proposals, the Town hired Elevated Environmental to handle the ACM abatement and KTF Services to relocate non-ACM debris in order to facilitate the AST removal and closure. Project team members held frequent conference calls on an approximately monthly basis over the course of the grant to discuss project activities.

## **2.0 Project Task Descriptions**

The Town used the grant funds for these tasks, as follows: Project Management and Reporting, Community Involvement/Engagement, Cleanup Planning; and Site Cleanup Activities. The Town ensured that the necessary activities were completed to manage the project in accordance with the work plan and all required statutes, circulars, and terms and conditions, including establishment and maintenance of necessary cooperative agreement records and files; financial management, project oversight, attendance at necessary project meetings, and attendance at EPA conferences and meetings.

## **2.1 Task 1 - Project Management and Reporting:**

The Town performed the following project management tasks as required to implement and manage the project under the cooperative agreement terms and conditions.

### **A. Federal Funding Accountability & Transparency Act (FFATA):**

- a. The Town completed the System for Award Management registration (SAM) ([www.sam.gov](http://www.sam.gov)) and made payment request withdrawals of funds.
- b. The Town did not subaward funds; therefore, registration and reporting through the FFATA Subaward Reporting System ([www.FSRS.gov](http://www.FSRS.gov)) was not required or completed.

**B. Contractor Procurement:** The Town, through a competitive process and in accordance with 2 CFR Part 200 Uniform Administrative requirements for Grants and Cooperative agreements to State and Local Governments, hired Cardno to assist with project activities, public involvement, cleanup planning, and oversight of cleanup. Subsequently, a Request for Qualifications to complete the ACM-debris removal activities was advertised on the Town's website and posted on the state's procurement website with a response date of May 24, 2019. After the project team evaluated the responses, Elevated Environmental was selected to complete the ACM-debris removal. A separate Request for Qualifications was advertised on the Town's website and posted on the state's procurement website for debris consolidation activities with a due date of July 26, 2019. After evaluation of the responses, KTF Services was selected to relocate non-ACM debris to the former basement area of the mill building to provide access to the ASTs and associated underground piping in the area around the smokestack.

**C. Kick-off Meeting:** A Kick-off meeting was held November 29, 2018, with the Town, EPA, NCDEQ, and Cardno in attendance. A site visit was made subsequent to the meeting.

**D. ACRES:** Information on the cleanup was submitted and maintained via the on-line Assessment Cleanup Redevelopment Exchange System (ACRES) database. The ACRES database has been completed for this grant.

**E. Quarterly Reporting:** The Town completed and submitted 16 quarterly progress reports. The quarterly reports were completed in the format as designated by EPA and copies were sent to Olga Perry, EPA Project Manager.

**F. Annual DBE Reporting:** Disadvantaged Business Enterprise (DBE) Reporting (also known as Minority Business Enterprise/Women-owned Business Enterprise – MBE/WBE) were completed on an annual basis. Reports were submitted on October 30, 2018, October 30, 2019, October 30, 2020, and October 30, 2021, with the final report being submitted on October 30, 2022 (Attachment A).

**G. Annual Financial Reporting:** Federal Financial Reports (FFRs) (EPA Standard Form 425) were submitted to EPA October 30, 2018, October 30, 2019, October 30, 2020, and October 30, 2021, with the final report being submitted on October 30, 2022. (Attachment B).

**H. Final Performance Report:** This Report serves as the Final Performance Report and Cleanup Report.

This final performance report includes the following:

1. The Final Budget, a summary of funds expended, (Attachment C) and work completed (see below);
2. Site photographs of cleanup (Attachment D);
3. Cleanup activities and how they are protective of human health and the environment (see below);
4. Final MBE/WBE Utilization Form (Attachment A); and,
5. Final Financial Status Report (Attachment B).

**2.2 Task 2 – Community Outreach:** The Town performed the following:

- Prepared and submitted a Community Involvement Plan to the EPA and NCDEQ in February 2019;
- Held a community meeting prior to the grant submission (33 in attendance); the ABCA was presented and public noticed for 30 days. No comments were received on the ABCA;
- Held a public kick-off meeting on October 2, 2018 (15 community members in attendance);
- Held a community meeting on August 13, 2019 8 community members in attendance);
- Presented a final project update at the Town Board meeting on November 18, 2021 (10 community members in attendance); and
- Town Manager, Mr. David Lambert, attended the Southeastern Regional Brownfields Conference and New Grantees Workshop in Birmingham, Alabama on September 25-28, 2018.

**2.3 Task 3 – Cleanup Planning**

- An Analysis of Brownfields Cleanup Alternatives (ABCA) was prepared prior to the Town’s EPA Brownfields Cleanup Grant Application in October 2017. It was public noticed for comment at that time, and no comments were made. The ABCA did not require modification.
- A Site-specific Quality Assurance Project Plan (SSQAPP) for the confirmation sampling required for the closure and removal of the aboveground storage tanks and associated piping was prepared and approved on January 27, 2019. Subsequently, SSQAPP 1-B to collect a groundwater sample in the area of the underground piping was approved on September 15, 2021.

- An extension to the EPA Brownfields Cleanup Grant was provided by Region 4 on September 3, 2020. The grant was extended until March 31, 2021. A second extension was provided to extend the grant until September 30, 2022.

#### **2.4 Task 4 - Site Cleanup**

- Cleanup work began on January 28, 2019. Equipment was mobilized to the site, temporary facilities were established, and appropriate signage was installed. Asbestos abatement continued through February 6, 2019. Approximately 108 cubic yards of ACM debris was transported to the A-1 Sandrock Landfill in Greensboro, North Carolina. Manifests are included in Attachment E.
- Air monitoring was conducted by Duncklee & Dunham. Daily project air monitoring was conducted during background, preparation and abatement activities in each containment and /or area. No problems occurred during the daily air monitoring (Attachment F).
- KTF Services mobilized to the site in February 2022 after the ACM removal was complete. KTF relocated all non-ACM debris surrounding the smokestack, which was blocking access to the ASTs and underground piping, and consolidated it within the former basement area of the former mill building.
- Due to the COVID-19 pandemic, site cleanup activities were placed on hold for almost a year.
- One 25,000-gallon and one 3,200-gallon AST and approximately 30 feet of underground product piping were properly closed and removed. Cardno provided in-house staff and contracted with D. H. Griffin Wrecking Company (DHGWC), of Greensboro, North Carolina, to conduct AST and piping removal activities. Personnel and equipment were mobilized to the site on February 7, 2021. Prior to removing the ASTs, Cardno contracted with DHGWC to use a vacuum truck to remove fluids and residual petroleum products from the tanks. Once determined safe, access holes were cut into the tanks in order to facilitate cleaning any residual petroleum from the side walls, and to meet disposal criteria for the destination scrap yard. DHGWC used a pressure washer and vacuum hose to clean the tanks. Additionally, DHGWC tried to remove any fuel oil product from the observed piping. However, no product was recovered. It was later noted that the fuel oil had hardened and solidified in the pipe. DHGWC used the excavator to remove the tanks and used a flatbed trailer to haul the tanks to their in-house scrap yard, D. H. Griffin Scrap Metals. Excavations were made to uncover the product piping that was buried approximately 2-feet below the surface. Piping was loaded into a dump truck and taken to the same scrap yard. A slight fuel oil odor was noted along with residual fuel oil staining on the soils beneath the product lines. DHGWC cleaned the tanks and removed a total of 86 gallons of petroleum-contact water, USTs, and associated piping for disposal at their facility in Greensboro, North Carolina. Manifests are included in Attachment F. Upon completion of removal, confirmation soil



samples were collected and analyzed per the SSQAPP.

- A final closure report for the removal of the aboveground storage tanks and associated underground piping system was completed and submitted to NCDEQ on June 30, 2021. Following their review, NCDEQ requested a groundwater sample in the area where residual petroleum was detected in soils after removal of the underground piping system. Cardno mobilized to the site and attempted to collect a groundwater sample the week of September 13, 2021; however, the driller reached auger refusal around 20 feet below ground surface and no groundwater was encountered. Previous assessments found groundwater in the area at 17 feet below ground surface. After discussions with NCDEQ and EPA, the project team decided to engage another driller to reach at least 50 feet below ground surface in an attempt to collect a groundwater sample. The grant period of performance was extended to facilitate the additional confirmation sampling. Cardno engaged a driller with an air rotary drill with a pneumatic hammer to install a boring to a depth of 42 feet below ground surface (bgs), encountering groundwater at 35 bgs. A temporary groundwater monitoring well we constructed, and a sample collected. Laboratory analysis of the sample identified only one volatile organic compound, which was below the NC State Groundwater 2L standard. The Groundwater Confirmation Sampling Report was submitted to EPA and NCDEQ on February 22, 2022. NCDEQ responded with comments on February 28, 2022. Cardno revised the report and resubmitted on March 10, 2022. Based on the results, NCDEQ issued a letter requiring a Notice of Residual Petroleum (NORP) for the site on August 17, 2022.
- Compliance with Davis-Bacon Act terms and conditions were met for applicable work performed at the site. Employee interviews were conducted during site work and contractors provided certified payrolls. No violations of the wage rate were noted.

### **3.0 Budget**

The Final Budget is included as Appendix C.

### **4.0 Project Benefits & Challenges**

The project started with the ACM debris removal and debris relocation being completed as scheduled. The COVID-19 pandemic caused a delay in the tank removal activities, which resulted in period of performance extension requests. However, the two ASTs and underground piping were removed and properly closed per North Carolina requirements. NCDEQ required a NORP on August 17, 2022. Overall, the project successfully removed 108 cubic yards of ACM debris, consolidated the remaining non-ACM debris to an area on the adjacent parcel, and properly closed two ASTs and their associated underground piping. While some residual contamination remains, the levels do not impact the planned reuse of the parcel.

# Attachment A

## Final DBE Report

# Attachment B

## Final Federal Financial Report

# Attachment C

## Final Budget

Budget Update:

Expense Category	Current Approved Budget	Costs Incurred This Quarter	Costs Incurred To Date	Total Funds Remaining
Personnel	\$2,500.00	\$0.00	\$0.00	\$2,500.00
Travel	\$5,000.00	\$0.00	\$1,113.86	\$3,886.14
Equipment	\$0.00	\$0.00	\$0.00	\$0.00
Supplies	\$2,500.00	\$0.00	\$0.00	\$2,500.00
Contractual	\$190,000.00	\$945.08	\$192,535.89	-\$2,535.89
Other				
Total	\$200,000.00	\$945.08	\$193,649.75	\$6,350.25

# Attachment D

## Photos

# PHOTOGRAPHIC LOG



Client Name: Town of Robbins

Site Location: 200 S. Kennedy Street  
Robbins, NC

Project No.  
PB00269000

Photo No.  
**1**

Date:  
2/4/2021

Direction Photo Taken:

West

Description:

Contractors preparing for AST removal.



Photo No.  
**2**

Date:  
2/4/2021

Direction Photo Taken:

South

Description:

Preparing larger AST for cleaning and removal.



# PHOTOGRAPHIC LOG



Client Name: Town of Robbins

Site Location: 200 S. Kennedy Street  
Robbins, NC

Project No.  
PB00269000

Photo No.  
**3**

Date:  
2/8/2021

Direction Photo Taken:

N/A

Description:

Loading larger AST for transport  
to disposal.



Photo No.  
**4**

Date:  
2/4/2021

Direction Photo Taken:

North

Description:

Preparing smaller AST for  
cleaning and removal.





# PHOTOGRAPHIC LOG



Client Name: Town of Robbins

Site Location: 200 S. Kennedy Street  
Robbins, NC

Project No.  
PB00269000

Photo No.  
**5**

Date:  
2/8/2021

Direction Photo Taken:

North

Description:

Removing smaller AST for transport and disposal.



Photo No.  
**6**

Date:  
2/8/2021

Direction Photo Taken:

North

Description:

Photograph of the empty AST saddles.



# PHOTOGRAPHIC LOG



Client Name: Town of Robbins

Site Location: 200 S. Kennedy Street  
Robbins, NC

Project No.  
PB00269000

Photo No.  
**7**

Date:  
2/8/2021

Direction Photo Taken:

Northwest

Description:

Photograph showing location and soil staining from underground piping, running from ASTs to former boiler room.



# Attachment E

## Waste Manifests

(4)

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES  
HEALTH HAZARDS CONTROL

TYPE OR USE BALLPOINT PEN  
PRESS FIRMLY - ALL COPIES  
MUST BE LEGIBLE

### NORTH CAROLINA ASBESTOS WASTE SHIPMENT RECORD

1. Waste Generator/Owner Name and Address Town of Robbins 101 N. Modictor Robbins NC 27328		Work Site Name and Physical Address Robbins Mill Site 200 S. Kennedy St Robbins NC 27328	Waste Generator/Owner Phone Number: (910) 948-2431
2. Contractor Name and Address: Elevated Environmental Corporation 1001 NE Market Street Ridgeway, NC 27320		Contractor Phone Number: (800) 718-7144	
3. Waste Disposal Site (WDS) Name, Mailing Address: A-1 Soudred Landfill 2111 B. Shop Rd Copersboro NC 27301		WDS Physical Site Location: 11	WDS Phone Number: (336) 855-8155
		NC Landfill Permit #: CDFLY112	

4. Name of Responsible Agency:

<input type="checkbox"/> Forsyth Co. Office of Env. Assistance and Protection	Permit #: _____	NESHAP ID #: _____
<input type="checkbox"/> Mecklenburg Co. Dept. of Air Quality	Start Date: _____	Complete Date: _____
<input type="checkbox"/> NC DHHS - Health Hazards Control		
<input type="checkbox"/> WNC Regional Air Quality Agency		

5. Description of materials: RCM TSI / non-Regulated Transite (contaminated) Brick

6. Containers Number: <u>1</u>	Vehicle: <u>Trailer</u>	RQ, ASBESTOS, CLASS 9 NA 2212, III	7. Total Quantity (yd <sup>3</sup> )m <sup>3</sup> : <u>7 yds</u>
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8. Special Handling Instructions and Additional Information:  
covered Seal / wet / labels

**EMERGENCY CONTACT: DIVISION OF EMERGENCY MANAGEMENT AT 1-800-858-0368**

9. CONTRACTOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

Printed/Typed Name & Title: Justin Cox VP

Signature: [Signature] Date (MM/DD/YY): 02/05/2020

10. Transporter 1 (Acknowledgment of Receipt of Materials):

Printed/Typed Name & Title: Justin Cox VP

Address: 1001 NE Market St. Raleigh NC 27600 Phone Number: 336-645-5045

Signature: [Signature] Date (MM/DD/YY): \_\_\_\_\_

11. Transporter 2 (Acknowledgment of Receipt of Materials):

Printed/Typed Name & Title: \_\_\_\_\_

Address: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Signature: \_\_\_\_\_ Date (MM/DD/YY): \_\_\_\_\_

12. Discrepancy Indication Space: TO BE STORED AT EEC Transfer facility, T.I. Dumped with other waste @ 1001 NE Market St. Raleigh NC

13. Waste Disposal Site: \_\_\_\_\_ Owner or Operator Certification of Receipt of Asbestos Materials Covered by this Manifest, Except as Noted in Item #12.

Printed/Typed Name & Title: \_\_\_\_\_ Total Weight (Tons): \_\_\_\_\_

Signature: \_\_\_\_\_ Date (MM/DD/YY): \_\_\_\_\_

①

**NORTH CAROLINA ASBESTOS WASTE SHIPMENT RECORD**

1. Waste Generator/Owner Name and Address: Asbestos Robert H. C. 27325		Work Site Name and Physical Address: Robbins Mill Site 200 Robbins Mill Rd Robbins NC 27325		Waste Generator/Owner Phone Number: (910) 948-2431	
2. Contractor Name and Address: Elevated Environmental Corporation 1001 NE Market St. Reidsville, NC 27320			Contractor Phone Number: (800) 718-7144		
3. Waste Disposal Site (WDS) Name, Mailing Address: A/S... 2111 Bishop Rd Greensboro NC 27401		WDS Physical Site Location: 11		WDS Phone Number: (336) 855-8195	
4. Name of Responsible Agency: Forsyth Co. Office of Env. Assistance and Protection Mocklenburg Co. Dept. of Air Quality NC DHHS - Health Hazards Control WNC Regional Air Quality Agency		Permit #: / Start Date: /		NESHA ID #: / Complete Date: /	
5. Description of materials: ACM contaminated brick/concrete debris (non friable)					
6. Containers Number: 1 Type:		Vehicle: Dump Trailer 53		7. Total Quantity (yd <sup>3</sup> ): 61 yd <sup>3</sup>	
8. Special Handling Instructions and Additional Information: wet/seal		<b>EMERGENCY CONTACT: DIVISION OF EMERGENCY MANAGEMENT AT 1-800-858-0368</b>			
9. CONTRACTOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.					
Printed/Typed Name & Title: Justin Cox Project Manager Signature: [Signature] Date (MM/DD/YY): 01/31/2020					
10. Transporter 1 (Acknowledgment of Receipt of Materials): Printed/Typed Name & Title: Avery Johnson Driver (A/Landfill) Address: 2111 Bishop Rd Greensboro NC Phone Number: 336-858-8195 Signature: [Signature] Date (MM/DD/YY): 01/31/2020					
11. Transporter 2 (Acknowledgment of Receipt of Materials): Printed/Typed Name & Title: Address: Phone Number: Signature: Date (MM/DD/YY):					
12. Discrepancy Indication Space:					
13. Waste Disposal Site: Owner or Operator Certification of Receipt of Asbestos Materials Covered by this Manifest, Except as Noted in Item #12. Printed/Typed Name & Title: Brandon Benson Weightmaster Total Weight (Tons): 24.3 Signature: [Signature] Date (MM/DD/YY): 1-31-2020					

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3  
2

NORTH CAROLINA ASBESTOS WASTE SHIPMENT RECORD

1. Waste Generator/Owner Name and Address: Town of Robbers 101 N. Core City St Robbers NC 27338	Work Site Name and Physical Address: Robbers M. H. St 200 S. S. St Robbers NC 27338	Waste Generator/Owner Phone Number: 910, 948-2431
2. Contractor Name and Address: Elevated Environmental Corporation 1001 NE Market St. Ridsville NC 27320		Contractor Phone Number: (910) 718-7144

3. Waste Disposal Site (WDS) Name, Mailing Address: Al Sand Reefs (cont. 1) B. Chip Rd Greentown NC 27401	WDS Physical Site Location: //	WDS Phone Number: 336, 551-8195
NC Landfill Permit #: C5LF4117		

4. Name of Responsible Agency:

Forsyth Co. Office of Env. Assistance and Protection  
 Mecklenburg Co. Dept. of Air Quality  
 NC DHHS - Health Hazards Control  
 WNC Regional Air Quality Agency

Permit #: \_\_\_\_\_ NESHAP ID #: \_\_\_\_\_  
 Start Date: \_\_\_\_\_ Complete Date: \_\_\_\_\_

5. Description of materials: RC-M Brick

6. Containers Number: <u>1</u> Type: _____	Vehicle: <u>Tractor</u> <u>2013</u>	RQ, ASBESTOS, CLASS 9 NA 2212, III	7. Total Quantity (yd <sup>3</sup> )m <sup>3</sup> : <u>20 yd<sup>3</sup></u>
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8. Special Handling Instructions and Additional Information:  
Wet

EMERGENCY CONTACT: DIVISION OF EMERGENCY MANAGEMENT AT 1-800-858-0368

9. CONTRACTOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

Printed/Typed Name & Title: Justin Cox Proper Manager  
 Signature: \_\_\_\_\_ Date (MM/DD/YY): 01/31/20

10. Transporter 1 (Acknowledgment of Receipt of Materials):  
 Printed/Typed Name & Title: Darrell Turner Operator  
 Address: 5159 Woodman Road Gilead NC 27306 Phone Number: 336-967-3779  
 Signature: \_\_\_\_\_ Date (MM/DD/YY): 01/31/2020

11. Transporter 2 (Acknowledgment of Receipt of Materials):  
 Printed/Typed Name & Title: \_\_\_\_\_  
 Address: \_\_\_\_\_ Phone Number: \_\_\_\_\_  
 Signature: \_\_\_\_\_ Date (MM/DD/YY): \_\_\_\_\_

12. Discrepancy Indication Space:

13. Waste Disposal Site: \_\_\_\_\_  
 Owner or Operator Certification of Receipt of Asbestos Materials Covered by this Manifest, Except as Noted in Item #12.  
 Printed/Typed Name & Title: Brandon Benson Weightmaster Total Weight (Tons): 7.9  
 Signature: \_\_\_\_\_ Date (MM/DD/YY): 2-3-2020

5

NORTH CAROLINA ASBESTOS WASTE SHIPMENT RECORD

1. Waste Generator/Owner Name and Address Owner of Robbers Ct 101 W. Middleton St Robbins NC 27325	Work Site Name and Physical Address Robbers Ct Site 200 S. Kenwood St Robbins NC 27325	Waste Generator/Owner Phone Number (910) 948-2431
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2. Contractor Name and Address: Elevated Environmental Corporation 1001 NE Market St. Reidsville, NC 27320	Contractor Phone Number: (800) 718-7144
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3. Waste Disposal Site (WDS) Name, Mailing Address: A1 Saw Rock Landfill 2111 Bishop Rd Greensboro NC 27401	WDS Physical Site Location: 2111 Bishop Rd	WDS Phone Number: (236) 555-8455
NC Landfill Permit #: 05LFP4117		

4. Name of Responsible Agency: <input type="checkbox"/> Forsyth Co. Office of Env. Assistance and Protection <input type="checkbox"/> Mecklenburg Co. Dept. of Air Quality <input type="checkbox"/> NC DHHS - Health Hazards Control <input type="checkbox"/> WNC Regional Air Quality Agency	Permit #: Start Date:	NESHAP ID #: Complete Date:
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5. Description of materials:

6. Containers Number: 1 Type: Rolloff	Vehicle: Rolloff	RQ, ASBESTOS, CLASS 9 NA 2212, III	7. Total Quantity (yd <sup>3</sup> ): 20 yd <sup>3</sup>
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8. Special Handling Instructions and Additional Information:  
Wet Covered

EMERGENCY CONTACT: DIVISION OF EMERGENCY MANAGEMENT AT 1-800-858-0368

9. CONTRACTOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

Printed/Typed Name & Title: John R. Cox CP  
Signature: [Signature] Date (MM/DD/YY): 02/04/2020

10. Transporter 1 (Acknowledgment of Receipt of Materials):

Printed/Typed Name & Title: Darrell Turner Operator  
Address: 5159 Woodrow Mont G. Rd NC 27206 Phone Number: 336-9622275  
Signature: [Signature] Date (MM/DD/YY): 02/04/2020

11. Transporter 2 (Acknowledgment of Receipt of Materials):

Printed/Typed Name & Title: \_\_\_\_\_  
Address: \_\_\_\_\_ Phone Number: \_\_\_\_\_  
Signature: \_\_\_\_\_ Date (MM/DD/YY): \_\_\_\_\_

12. Discrepancy Indication Space:

13. Waste Disposal Site: Owner or Operator Certification of Receipt of Asbestos Materials Covered by this Manifest, Except as Noted in Item #12.

Printed/Typed Name & Title: Brandon Benso Weightmaster Total Weight (Tons): 9.1  
Signature: [Signature] Date (MM/DD/YY): 2-4-2020

# MATERIAL MANIFEST

**D.H. GRIFFIN WRECKING Co., INC.**

4716 Hilltop Road • Greensboro, NC 27407  
Phone: (336) 855-7030

EMERGENCY PHONE NO.  
336-855-7030

Manifest Document No. 001
Page 1 of 4
D.H.G. Job # 21-38-6112

## GENERATOR INFORMATION

Name	US EPA ID No.
Street Address 200 South Kennedy St. Robbins, NC	Mailing Address
Phone No. 803-309-1729	Contact Brian Kvam

## DESCRIPTION OF MATERIALS

HM	USDOT Proper Shipping Name (Complete All Items for Hazardous Materials)	Hazard Class or Div.	UN / NA ID No.	Packing Group	Containers Qty.	Containers Type	Total Quantity	Unit Wt./Vol.
a.	Non-Regulated Materials (Petroleum + Water mixture)	N/A	N/A	N/A	1	TT	86	Gallons
b.								
c.								

## ADDITIONAL INFORMATION

	ERG No.	Profile Code	Facility Use
a.			
b.			
c.			

## GENERATOR'S CERTIFICATION

This is to certify that the above-described materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. I further certify that none of the materials described above are a hazardous waste as defined by EPA 40 CFR Part 261 or any applicable state law, and unless specifically identified above, the materials contain less than 1,000 ppm total halogens and do not contain quantifiable levels (2ppm) of PCBs as defined by EPA 40 CFR Parts 279 and 761.

Printed / Typed Name	Signature	Mo. / Day / Yr.
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## TRANSPORTER INFORMATION

Transporter <b>D.H. Griffin Wrecking Co.</b>	I hereby acknowledge receipt of the above-described materials for transport from the generator site listed above.	
Address 4716 Hilltop Road Greensboro, NC 27407	Signature <i>[Signature]</i>	Shipment Date 2/4/2021
Transporter or EPA ID No.	Unit No.	I hereby acknowledge that the above-described materials were received from the generator site and were transported to the facility listed below.
Phone 336-855-7030	Signature <i>[Signature]</i>	Delivery Date 2/4/2021

## FACILITY INFORMATION

Facility D.H. Griffin Company	I hereby acknowledge receipt of the materials covered by this manifest except for any discrepancy noted below.	
Address 4616 Hilltop Road Greensboro, NC 27407	Signature <i>[Signature]</i>	Receipt Date 2-4-2021
Facility or EPA ID No.	Discrepancies / Routing Codes / Handling Methods	
Phone 336-214-9012	a.	
Contact Eric McManus	b.	
	c.	





# Tank Disposal Manifest 21-38-6112

<b>Generator:</b> Town of Robbins	<b>Location:</b> 200 South Kennedy Street Robbins, NC	<b>Contact Name/Telephone Number:</b> Brian Kvam 803-309-1729
<b>Contractor:</b> D. H. Griffin Wrecking Company, Inc. 4716 Hilltop Road, Greensboro, NC 27407		<b>Contact Name/Telephone Number:</b> Eric McManus 336-214-9012
<b>Disposal Site/Address:</b> D.H. Griffin Scrap Metals 4700 Hilltop Road Greensboro, NC 27407	<b>Permit ID#:</b>	<b>Contact Name/Telephone Number:</b> Eric McManus 336-214-9012
<b>Type of Material:</b> 1-25,000 Gallon Steel Tank 1-3,200 Gallon Steel Tank		
<input type="checkbox"/> C&D Debris	<input checked="" type="checkbox"/> Scrap Metal	
<input type="checkbox"/> Inert/Clean Fill	<input type="checkbox"/> Salvaged Equipment – Description:	
<b>Select Units:</b> <input checked="" type="checkbox"/> Tons/ Lbs <input type="checkbox"/> Cubic Yards <input type="checkbox"/> Drums <input type="checkbox"/> Other _____	<b>Volume or Weight:</b> 22,780 LBS	
<b>Transportation Company Name/Address:</b> D.H. Griffin Wrecking Company 4700 Hilltop Road Greensboro, NC 27407		
<b>DHG Representative Name(Printed):</b> Eric A. McManus	<b>Signature:</b> <i>E. A. McManus</i>	<b>Date:</b> 2-8-2021

# Attachment F

## Air Monitoring Report



ENVIRONMENTAL GEOLOGISTS & ENGINEERS  
511 KEISLER DRIVE – SUITE 102  
CARY, NORTH CAROLINA 27518  
OFFICE: (919) 858-9898  
[WWW.DUNCKLEEDUNHAM.COM](http://WWW.DUNCKLEEDUNHAM.COM)

email: [Brian.Kvam@cardno.com](mailto:Brian.Kvam@cardno.com)

February 20, 2020

Mr. Brian Kvam  
1812 Lincoln Street  
Suite 301  
Columbia, South Carolina 29201

Reference: **Report of Asbestos Air Monitoring Services  
Former Robbins Mill  
Robbins, North Carolina**

Dear Mr. Kvam:


Duncklee & Dunham, P.C. (Duncklee & Dunham) was contracted to conduct air monitoring services during the cleanup of asbestos-contaminated demolition debris at the referenced site. Removal activities were conducted between Tuesday, January 28 and Monday, February 3, 2020 by Elevation Environmental. Asbestos-containing pipe insulation, wall and roof mastic, transite siding, floor tile, associated mastic, and vinyl floor and associated mastic were removed from the site. The materials were removed using wet methods and an excavator. The materials were transferred to 6-mil polyethylene-lined dumpsters for removal to a landfill.


During the removal of the debris, Duncklee & Dunham conducted visual assessments and collected ambient air samples between January 31 and February 3, 2020. Ambient samples were analyzed for fibers using NIOSH Method 7400 – Asbestos and other fibers by phase contrast microscopy (PCM). Sample results show that the fiber concentrations of the ambient samples are less than the maximum allowable asbestos exposure standard of 0.01 fibers per cubic centimeter in air for public areas [10A NCAC 41C .0607(a)]. The PCM analysis summary sheets are attached.


We appreciate this opportunity to provide services to Cardno. Please contact Doug Weaver at (919) 720 - 1307 if you have any questions.

Sincerely,

**Duncklee & Dunham, P.C.**

  
Rachel Whitmer  
Industrial Hygiene Project Specialist

  
Robert A. Herrick, P.E., CIH  
NC Supervising Air Monitoring #90065

  
Doug Weaver  
Industrial Hygiene Project Manager

*Senior Peer Review:*

  
Chris Bagley, P.E. CIH, CHMM, QEP  
Senior Engineer

Attachments:           PCM Analysis Summary Sheets

P:\Cardno\2020024 - Robbins Air Monitoring\Report of Air Monitoring Services - 20097.docx



**PCM ANALYSIS OF AIR SAMPLES**



ENVIRONMENTAL GEOLOGISTS & ENGINEERS  
 511 KEISLER DRIVE – SUITE 102  
 CARY, NORTH CAROLINA 27518  
 OFFICE: (919) 858-9898  
[WWW.DUNCKLEEDUNHAM.COM](http://WWW.DUNCKLEEDUNHAM.COM)

**Client Name: Cardno**

**Project Name: Robbins Mill - Air Monitoring Services**

**Project Address: Robbins, North Carolina**

**Material Removed: Demolition debris - pipe insulation, black mastic, vinyl floor**

**Project #: 2020024**

**Sample Date: January 30, 2020**

**Analysis Date: January 30, 2020**

Sample ID	Activity / Location	Sample Type	Flow Rate (liters/minute)			Running Time		Total Minutes	Volume (Liters)	Fibers	Fields	fibers/mm <sup>2</sup>	fibers/cc
			Start	End	Average	Start	Stop						
1	Equipment Trailer	OWA	4	4	4	09:15	3:25:00 PM	370	1480	9	100	11.46	0.003
2	Loadout	OWA	4	4	4	09:18	3:24:00 PM	366	1464	12	100	15.29	0.004
3	TSI Removal from AST	OWA	4	4	4	10:44	3:45:00 PM	301	1204	8	100	10.19	0.003
FB-1	Field Blank												
FB-2	Field Blank												

Analyzed By: Rachel Whitmer

Lab ID# PAT-232290

<p><u>Sample Type Abbreviations:</u>                  OWA=Outside Work Area                  IWA=Inside Work Area                  HEPA=Negative Air                  CL=Clearance                  B=Background                  P=Personal</p>	<p><u>Laboratory Information:</u>                  Method: NIOSH 7400, Rules: A                  Reticle: Walton Beckett                  Microscope: Olympus CX43                  Counting Field Area : 0.00785 mm<sup>2</sup>                  Effective Collection Area : 385 mm<sup>2</sup>                  Limit of Quantitation (LOQ) : 7 fibers/mm<sup>2</sup></p>
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**PCM ANALYSIS OF AIR SAMPLES**



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**Client Name:** Cardno  
**Project Name:** Robbins Mill - Air Monitoring Services  
**Project Address:** Robbins, North Carolina  
**Material Removed:** Demolition debris - pipe insulation, black mastic, vinyl floor

**Project #:** 2020024  
**Sample Date:** January 31, 2020  
**Analysis Date:** January 31, 2020

Sample ID	Activity / Location	Sample Type	Flow Rate (liters/minute)			Running Time		Total Minutes	Volume (Liters)	Fibers	Fields	fibers/mm <sup>2</sup>	fibers/cc
			Start	End	Average	Start	Stop						
4	NW	OWA	4	4	4	11:47	2:45:00 PM	178	712	6	100	7.64	0.004
5	NE	OWA	4	4	4	11:50	2:45:00 PM	175	700	9	100	11.46	0.006
6	SE	OWA	4	4	4	11:51	2:46:00 PM	175	700	10	100	12.74	0.007
7	SW	OWA	4	4	4	11:52	2:47:00 PM	175	700	7	100	8.92	0.005
FB-1	Field Blank												
FB-2	Field Blank												

Analyzed By: Rachel Whitmer  
 Lab ID# PAT-232290

<u>Sample Type Abbreviations:</u> OWA=Outside Work Area IWA=Inside Work Area HEPA=Negative Air CL=Clearance B=Background P=Personal	<u>Laboratory Information:</u> Method: NIOSH 7400, Rules: A Reticle: Walton Beckett Microscope: Olympus CX43 Counting Field Area : 0.00785 mm <sup>2</sup> Effective Collection Area : 385 mm <sup>2</sup> Limit of Quantitation (LOQ) : 7 fibers/mm <sup>2</sup>
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PCM ANALYSIS OF AIR SAMPLES



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[WWW.DUNCKLEEDUNHAM.COM](http://WWW.DUNCKLEEDUNHAM.COM)

Client Name: Cardno  
 Project Name: Robbins Mill - Air Monitoring Services  
 Project Address: Robbins, North Carolina  
 Material Removed: Demolition debris - pipe insulation, black mastic, vinyl floor

Project #: 2020024  
 Sample Date: February 3, 2020  
 Analysis Date: February 3, 2020

Sample ID	Activity / Location	Sample Type	Flow Rate (liters/minute)			Running Time		Total Minutes	Volume (Liters)	Fibers	Fields	fibers/mm <sup>2</sup>	fibers/cc
			Start	End	Average	Start	Stop						
1	Road adjacent to debris	OWA	4	4	4	09:05	4:23:00 PM	438	1752	20	100	25.48	0.006
2	Debris pile	OWA	4	4	4	09:17	4:26:00 PM	429	1716	4	100	5.10	0.001
3	Vinyl pad	OWA	4	4	4	09:25	4:29:00 PM	424	1696	12	100	15.29	0.003
4	Vinyl pad	OWA	4	4	4	09:31	4:32:00 PM	421	1684	13	100	16.56	0.004
FB-1	Field Blank												
FB-2	Field Blank												

Analyzed By: Rachel Whitmer  
 Lab ID# PAT-232290

<p><u>Sample Type Abbreviations:</u>                  OWA=Outside Work Area                  IWA=Inside Work Area                  HEPA=Negative Air                  CL=Clearance                  B=Background                  P=Personal</p>	<p><u>Laboratory Information:</u>                  Method: NIOSH 7400, Rules: A                  Reticle: Walton Beckett                  Microscope: Olympus CX43                  Counting Field Area : 0.00785 mm<sup>2</sup>                  Effective Collection Area : 385 mm<sup>2</sup>                  Limit of Quantitation (LOQ) : 7 fibers/mm<sup>2</sup></p>
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