Risk Management Plan

Complete Cleaners
1537 Freeway Drive
Reidsville, Rockingham County
DSCA Site ID DC790003

H&H Project No. DS0-114F
December 1, 2021

hart hickman

SMARTER ENVIRONMENTAL SOLUTIONS

#C-1269 Engineering
#245 Geology

2923 South Tryon Street, Suite 100
Charlotte, NC 28203
704.586.0007 main

3921 Sunset Ridge Rd , Suite 301
Raleigh, NC 27607
919.847.4241 main

www.harthickman.com

Risk Management Plan
Complete Cleaners (DSCA Site ID DC790003)
Reidsville, North Carolina
H&H Job No. DS0-114F

Table of Contents

Figures

Appendices

Risk Management Plan
Complete Cleaners (DSCA Site ID DC790003)
Reidsville, North Carolina
H&H Job No. DS0-114F

1.0 Introduction

Hart & Hickman, PC (H&H) has prepared this Risk Management Plan (RMP) to address dry-cleaning solvent contamination associated with the Complete Cleaners site (DSCA Site ID DC790003) on behalf of the North Carolina Department of Environmental Quality (NCDEQ), Dry-cleaning Solvent Cleanup Act (DSCA) Program. The source property for the Complete Cleaners dry-cleaning facility is located at 1537 Freeway Drive in Reidsville, Rockingham County, North Carolina, as shown on **Figure 1**. Impacts associated with the Complete Cleaners site (herein referred to as the "site") are limited to a portion of the source property (where the dry-cleaning facility is located). The site is as follows:

- Source property – ACI Freeway Crossing, LLC, 1537 Freeway Drive, Parcel Identification Number (PIN) 799415533043

A map identifying the impacted property is included as **Figure 2**. This RMP is intended to comply with the requirements of DSCA (N.C.G.S. 143-215.104A *et seqs*) and promulgated rules and follows the outline provided in the DSCA Program's risk-based corrective action (RBCA) guidance.

2.0 Objectives of Risk Management Plan

Assessment activities completed at the Complete Cleaners site indicated that tetrachloroethylene (PCE) and trichloroethylene (TCE) are present in soil at concentrations above unrestricted land-use standards and in groundwater at concentrations above Title 15A NCAC 2L .0202 Groundwater Standards (2L Standards). The impacts are limited to a portion of the source property.

H&H completed a risk assessment for the site in accordance with the DSCA Program's risk assessment procedures in September 2020. The results of the risk assessment indicate that there

are risks that exceed target risk levels on the source property. These risks will be managed using site-specific land-use conditions that have been selected as part of the risk assessment evaluation and which require an RMP. Thus, the objective of this RMP is to ensure that the site-specific land use conditions remain valid in the future.

3.0 Summary of Risk Assessment Report

Based on the presence of soil and groundwater impacts above unrestricted use standards, H&H completed a risk assessment to determine the risks associated with the dry-cleaning solvent impacts. This section provides a summary of the Risk Assessment, dated September 14, 2020, which recommended no further action status for the site with land-use controls for the affected property.

The risk assessment consisted of evaluating exposure pathways for the following exposure units, which are shown on **Figure 2**:

- Exposure Unit #1 (EU#1) encompasses a portion of the source property, including the active dry-cleaning facility and surrounding area of impacted soil and groundwater.
- Exposure Unit #2 (EU#2) encompasses the remaining area of the groundwater plume on the source property.

The protection of groundwater use and surface water contamination migration pathways were also evaluated during the risk assessment. The soil, groundwater, sub-slab gas, and indoor air data used in the risk assessment are shown on **Figures 3, 4,** and **5**. The results of the risk assessment are described below.

<u>Exposure Unit #1</u>

Complete exposure pathways for contamination identified within EU#1 include indoor inhalation of contaminants through vapor intrusion and soil exposure (combined pathways including ingestion, dermal contact, and outdoor inhalation of volatile constituents of concern [COCs] and particulates) by a current or future non-residential worker or future resident. The indoor air inhalation pathway was evaluated using indoor air contaminant concentration data for current

exposure scenario and sub-slab gas data for future exposure scenario. The soil exposure pathway was evaluated using soil data. H&H conservatively used the maximum contaminant concentrations detected for each affected media (soil, sub-slab gas, and indoor air) within the exposure unit for the exposure point concentrations (EPCs). The exposure pathways were modeled using the NCDEQ Risk Calculator.

The results of the risk evaluation for EU#1 indicated exceedances of acceptable risk levels for a future resident or future non-residential worker from the indoor inhalation exposure pathway through vapor intrusion. As referenced above, the future exposure scenario was modeled using conservative default attenuation factors applied to sub-slab gas data, which should account for possible future changes in vapor intrusion characteristics associated with building modifications. No exceedances of acceptable risk levels were identified for the current exposure scenario based on indoor air data. To address the future vapor intrusion risk exceedances, a land-use control is recommended for a portion of the source property included within EU#1 specifying that no activities that cause or create a vapor intrusion risk may occur without prior approval of NCDEQ. No exceedances of acceptable risk levels were identified for the soil exposure pathway for a current or future resident or future non-residential worker. However, because soil concentrations are present above unrestricted use levels, a land-use control is recommended for the area of impacted soil on the source property to address removal or disturbance of soil in the area where concentrations exceed unrestricted use levels. These land-use control areas are identified on **Figure 6**, as the "vapor intrusion control area" and the "soil disturbance control area", respectively. As groundwater is contaminated within EU#1, a land-use control preventing the use of groundwater is recommended.

Exposure Unit #2

Complete exposure pathways identified for EU#2 include indoor inhalation contaminants through vapor emissions by a current or future non-residential worker or a future resident. This exposure pathway was modeled for current and future exposure scenarios using the maximum concentrations detected in sub-slab gas and the NCDEQ Risk Calculator. The results of the risk evaluation for EU#2 did not indicate exceedances of acceptable risk levels. Therefore, the only land-use control recommended for the area of EU#2 is a control preventing the use of groundwater.

Protection of Groundwater Use – Contaminant Migration Pathway

For the protection of groundwater use evaluation, H&H identified the nearest potential point of exposure (POE) as the closest downgradient property boundary where groundwater impacts have not been observed. The POE location is approximately 70 feet northeast of the groundwater source area, as shown on **Figure 2**. Modeling under this scenario assumes that land-use controls preventing the use of groundwater will be implemented for the source property within EU#1 and EU#2. This area is identified on **Figure 6** as the "groundwater use control area".

The EPCs used for the groundwater source area were based on the maximum groundwater contaminant concentrations for any compound historically detected at the site. The EPCs used for the soil source area were based on the soil samples with the maximum contaminant concentrations detected at the site. Modeling was performed using the NCDEQ Risk Calculator.

The modeling results for the protection of groundwater use evaluation indicated exceedances of Site-Specific Target Levels (SSTLs) for source soil and source groundwater. In contrast, based on the documented conceptual contaminated site model, along with an evaluation of historical groundwater monitoring data, the data indicate that the plume is stable and does not reach the POE. The soil source area is currently covered by the building, which minimizes infiltration and likely affects the documented plume migration. However, because rate of infiltration is a significant variable in the leaching of contamination from soil and subsequent migration in groundwater, it is possible that plume expansion could occur as indicated by the model in the event that site conditions were altered such that infiltration rates increased in area of source contamination. Therefore, a land-use control is recommended to maintain the current surface cover to prevent an increase in infiltration in the area of impacted soil exceeding the SSTLs. This area is identified on **Figure 6** as the "surface cover" control area.

Protection of Surface Water – Contaminant Migration Pathway

For the protection of surface water use evaluation, the POE was determined to be a tributary to Little Troublesome Creek located approximately 830 feet southeast of the groundwater source area. Little Troublesome Creek is classified as a Class WS-V surface water body. The POE location is identified on **Figure 2**. Modeling was performed using the NCDEQ Risk Calculator

and the same EPCs for the soil and groundwater source areas referenced for the protection of groundwater use evaluation.

Modeling results for the protection of surface water use evaluation indicated no exceedances of SSTLs for source soil or source groundwater. Based on the modeling results, documented conceptual contaminated site model, and groundwater monitoring data, the protection of surface water pathway is not considered a significant concern. Therefore, no additional land-use controls are recommended for this exposure pathway.

Based on the results of this risk assessment, H&H concludes that the risks associated with the contamination at the site can be managed through implementation of land-use controls, as detailed in this RMP. Therefore, the risk assessment recommended risk-based closure for the site. The land-use controls proposed for the site are discussed in Section 6.0.

4.0 Remedial Action Plan

4.1 Assessment Activities and Interim Actions

The source property contains a multi-tenant commercial strip shopping center building known as Freeway Crossing that was constructed in the mid to late 1990s. Upon construction of the shopping center, dry-cleaning operations began in the northernmost tenant space of the shopping center under the name Complete Cleaners in approximately 1998. Complete Cleaners is currently an active petroleum-based dry-cleaning facility. The dry-cleaning facility utilized PCE as the dry-cleaning solvent from 1998 to 2015. In 2015, the facility changed to use of petroleum-based solvents (i.e., DF-2000™ and EcoSolv®). The facility has been regularly inspected by the DSCA Program since 2008 and has remained in compliance. The DSCA Program's assessment focused on evaluation of potential chlorinated solvent releases since evidence of petroleum-based solvent releases has not been identified.

In March 2015, Phase I and II Environmental Site Assessments (ESAs) were performed as part of due diligence activities for a property transaction. The Phase I ESA identified the Complete

Cleaners facility as an environmental concern. The Phase II ESA included collection of soil samples within the dry-cleaning tenant space and immediately outside the back door of the facility. In addition, two temporary groundwater monitoring wells were installed at the rear of the facility and immediately downgradient of the facility. Soil analytical results from the Phase II ESA sampling indicated the presence of the chlorinated solvent PCE in soil adjacent to the dry-cleaning machine and outside the back door of the facility. PCE was also detected in groundwater samples collected from both temporary monitoring wells at concentrations in exceedance of the 2L Standard. After confirmation of the dry-cleaning solvent release on the source property, the property owner petitioned for entry of the site into the DSCA Program. The site was certified into the program in July 2015. The DSCA Program subsequently performed assessment and monitoring activities between 2015 and 2020.

The initial assessment activities performed by the DSCA Program in 2016 identified groundwater impacted by PCE and TCE in the area of the dry-cleaner and downgradient to the north-northeast. Soil impacted by PCE and/or TCE has been detected in the area below the dry-cleaning machine, outside the rear door of the tenant space, and along the northern wall of the tenant space at concentrations above Preliminary Soil Remediation Goals (PSRGs). The extent of impacted soil and groundwater are considered adequately delineated and confined to the source property. A receptor survey was performed, which identified multiple private water supply wells, within 1-mile radius of the site. An unnamed tributary to Little Troublesome Creek (North Carolina Surface Water Classification WS-V) is located approximately 800 feet east-northeast and downgradient of the dry-cleaning facility. Based on the identified extents of groundwater impacts at the site, water supply well and surface water sampling have not been deemed warranted.

Vapor intrusion assessment included sub-slab gas and/or indoor air sampling in the dry-cleaning facility and two adjacent tenant spaces to the south. The calculated risks associated with the detected PCE and TCE concentrations in sub-slab gas indicated exceedances of acceptable risk levels for residential and/or non-residential land-use in the dry-cleaning facility and adjacent tenant space to the south. Indoor air sampling was performed to further evaluate indoor air concentrations in these spaces. Minor detections of PCE were reported in each of the indoor air samples, but a

review of the data using the DSCA Program's risk calculators indicated acceptable levels for residential and non-residential use.

Quarterly groundwater monitoring was conducted between July 2017 and July 2018 to evaluate groundwater contaminant plume stability. The groundwater sampling results indicated levels of PCE and TCE above 2L Standards in two monitoring wells, MW-3 and MW-4, but concentrations appeared stable and no exceedances of 2L Standards were identified in the perimeter monitoring wells. The results of the sampling events confirmed groundwater contaminant plume stability.

H&H submitted a Risk Assessment report for the site on September 14, 2020. As discussed in detail in Section 3.0, the risk assessment concluded that risks associated with the contamination at the site could be managed through implementation of land-use controls as detailed in this RMP. Therefore, the risk assessment recommended risk-based closure for the site. The purpose of this RMP is to ensure that the assumptions made in the risk assessment remain valid in the future.

4.2 Remedial Action

According to the DSCA Program's RBCA guidance, no remedial action is necessary if four site conditions are met. Each of these conditions and their applicability to the subject site are addressed below.

Condition 1: The dissolved plume is stable or decreasing.

Quarterly groundwater monitoring events were performed at the site from July 2017 to July 2018. PCE and TCE were the only constituents detected above 2L Standards in groundwater at the site. Exceedances of 2L Standards were limited to well MW-3, which was sampled five times, and well MW-4, which was sampled three times. The plume stability evaluation included performing a Mann-Kendall statistical analysis of the PCE and TCE groundwater data for monitoring well MW-4 using the GSI Mann-Kendall Toolkit. The results of the evaluation reported "no trend" for PCE and TCE in well MW-4. Based on the Mann-Kendall Toolkit User's Manual (GSI, 2012), a "no trend" result can be considered evidence that the concentration is not increasing, similar to a stable result. A Mann-Kendall trend evaluation could not be performed for well MW-3 since only

three sampling dates were available. However, H&H manually reviewed the data for wells MW-3 and MW-4 to further identify trends. Overall, concentrations detected are low (less than 10 micrograms per liter [µg/L] in MW-3 and less than 5 µg/L in MW-4) and data do not suggest a significantly increasing trend. In addition, PCE and TCE have not been detected in downgradient monitoring wells MW-5, MW-6, and MW-7. Overall, H&H concludes that the plume is adequately defined and stable. The plume stability demonstration, including a table showing historical groundwater analytical data and GSI Mann-Kendall evaluations, is included in **Appendix A**. The monitoring well locations are shown on **Figure 4**.

Condition 2: The maximum concentration within the exposure domain for every complete exposure pathway of any COC is less than ten times the EPC of that COC.

For the risk assessment, H&H used the maximum concentrations detected at the site as the EPC for each constituent. Thus, this condition has been met for all COCs and exposure pathways.

Condition 3: Adequate assurance is provided that the land-use assumptions used in the DSCA Program's RBCA process are not violated for current or future conditions.

As discussed in Section 6.0, land-use controls will be implemented on the source property and one off-source property to ensure that the assumptions made in the risk assessment remain valid in the future.

Condition 4: There are no ecological concerns at the site.

H&H completed a Level 1 Ecological Risk Assessment for the site in accordance with the DSCA Program's RBCA guidance. The results of the evaluation indicate that the release does not pose an unacceptable ecological risk. The completed Level 1 Ecological Risk Assessment Checklists A and B and associated attachments are included as **Appendix B**.

The site's compliance with the four above referenced conditions confirms that the contaminant concentrations are not likely to pose an unacceptable risk either at present or in the future. Remaining contamination is expected to naturally attenuate over time. The appropriate remedial action is to implement land-use controls on the source property and one off-source property where contamination is present.

5.0 Data Collected During RMP Implementation

No further sampling or other data collection activities are proposed for the site, as long as the assumptions detailed in the Notice of Dry-Cleaning Solvent Remediation (NDCSR) remain valid. As such, this section is not applicable.

6.0 Land-Use Controls

As discussed in Section 3.0, the recommendation for closure in the risk assessment for the site was based on the following land-use controls:

- No activities that encounter, expose, remove or use groundwater will occur on a portion of the source property without prior approval of NCDEQ in the area identified as "groundwater use control area" on **Figure 6**.
- No activities that disturb or remove soil will occur on a portion of the source property without prior approval of NCDEQ in the area identified as "soil disturbance control area" on **Figure 6**.
- No activities that cause or create an increase in infiltration will occur on a portion of the source property without prior approval of NCDEQ in the area identified as "surface cover control area" on **Figure 6**.
- No activities that cause or create a vapor intrusion risk will occur on a portion of the source property without prior approval of NCDEQ in the area identified as "vapor intrusion control area" on **Figure 6**.

Institutional controls will be implemented to ensure that land-use conditions are maintained and monitored until the land-use controls are no longer required for the site. The NDCSR was prepared for the source property to comply with the land-use control requirement. The NDCSR for the source property is included in **Appendix C**. Refer to the NDCSR for the specific language to be incorporated to address each of the risk assessment assumptions. A plat showing the locations and types of dry-cleaning solvent impacts on the site is included as an exhibit to the NDCSR. The

locations of dry-cleaning solvent impacts are where contaminants have been detected at concentrations above unrestricted use standards.

7.0 Long-Term Stewardship Plan

The NDCSR for the source property contains a clause which requires the owner of the Complete Cleaners source property to submit a notarized "Annual Certification of Land-Use Restrictions" to NCDEQ on an annual basis certifying that the NDCSR remains recorded with the Register of Deeds and that land-use restrictions (LURs) are being complied with. An example of such a notice is included in **Appendix D**.

8.0 RMP Implementation Schedule

Since the groundwater plume is stable and possible exposure to the contamination is managed through the NDCSR, no additional site remediation activities are required to implement the RMP. A 30-day public comment period will be held to allow the community an opportunity to comment on the proposed strategy. **Appendix E** includes example documents that will be used to announce the public comment period in the local newspaper and to inform local officials, nearby property owners, and interested parties. Upon completion of the public comment period and final approval of the RMP, the NDCSR will be filed with the Rockingham County Register of Deeds and will complete the RMP schedule.

9.0 Criteria for Demonstrating RMP Success

The RMP will be successfully implemented once the required NDCSR has been executed and recorded with the Rockingham County Register of Deeds. The NDCSR may, at the request of the owner of the property, be canceled by NCDEQ after the risk to public health and the environment associated with the dry-cleaning solvent contamination and any other contaminants included in the dry-cleaning solvent assessment and remediation agreement has been eliminated as a result of remediation of the property. If NCDEQ is notified of a change in site conditions, per the notification requirements detailed in the NDCSR, the RMP will be reviewed to determine if the

site conditions have impacted the requirements set forth in the NDCSR and if changes are required. Enforcement of the RMP will be maintained through receipt of the "Annual Certification of Land-Use Restrictions" from the property owner as part of the NDCSR requirements.

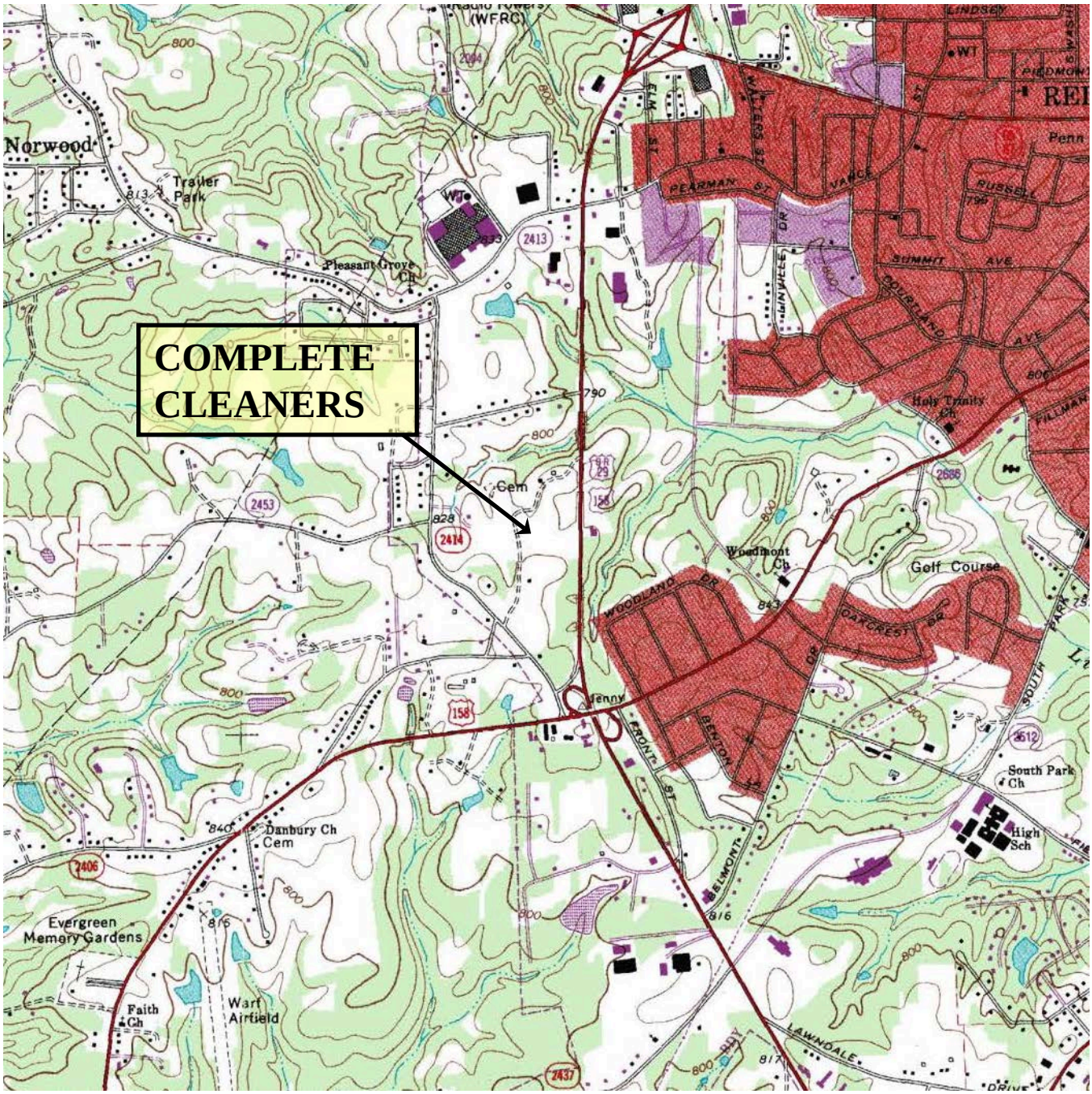
10.0 Contingency Plan if RMP Fails

As discussed above, unless the DSCA Program is notified of a change in land-use conditions at the subject site, per the notification requirements detailed in this plan, the RMP will remain in effect until the RMP has met its objectives and is considered a success. Pursuant to N.C.G.S. 143-215.104K, if any of the LURs set out in the NDCSR are violated, the owner of the site property at the time the LURs are violated, the owner's successors and assigns, and the owner's agents who directed or contracted for alteration of the site in violation of the LURs, shall be held liable for the remediation of all contaminants to unrestricted use standards.

11.0 Conclusions and Recommendations

H&H has prepared this RMP for the Complete Cleaners site on behalf of the DSCA Program. The results of the risk assessment completed for the site indicate that contaminant concentrations do not pose an unacceptable risk with appropriate land-use controls applied to the impacted property. The groundwater contaminant plume associated with the site appears to be stable. This RMP specifies that the NDCSR requirements provide notification that land-use conditions observed during the risk assessment evaluation remain valid in the future. Based on the documentation contained in this report, H&H recommends issuance of a "No Further Action" letter.

Figures



N

APPROXIMATE

0 2000 4000

SCALE IN FEET

U.S.G.S. QUADRANGLE MAP

REIDSVILLE, NORTH CAROLINA (1994)

QUADRANGLE
7.5 MINUTE SERIES (TOPOGRAPHIC)

TITLE	**SITE LOCATION MAP**
PROJECT	**COMPLETE CLEANERS** **DSCA SITE ID DC790003** 1537 FREEWAY DRIVE REIDSVILLE, ROCKINGHAM COUNTY, NC

hart hickman
SMARTER ENVIRONMENTAL SOLUTIONS

3921 Sunset Ridge Road, Ste 301
Raleigh, North Carolina 27612
919 847 2506 (p) 919 847 4261 (f)

DATE:	04-16-19	REVISION NO:	0
JOB NO:	DS0-114	FIGURE 1	

LEGEND

- COMPLETE CLEANERS
- SOURCE PROPERTY BOUNDARY
- ADJACENT PARCEL BOUNDARY
- SHALLOW MONITORING WELL LOCATION
- TEMPORARY MONITORING WELL LOCATION
- SOIL SOURCE AREA
- GROUNDWATER SOURCE AREA
- UNNAMED TRIBUTARY TO LITTLE TROUBLESOME CREEK
- PROTECTION OF SURFACE WATER POE
- PROTECTION OF GROUNDWATER POE
- EXPOSURE UNIT #1
- EXPOSURE UNIT #2
- WATER SUPPLY WELL

NOTE:

1. AERIAL OBTAINED FROM ROCKINGHAM COUNTY GIS.

N

APPROXIMATE
0 150 300
SCALE IN FEET

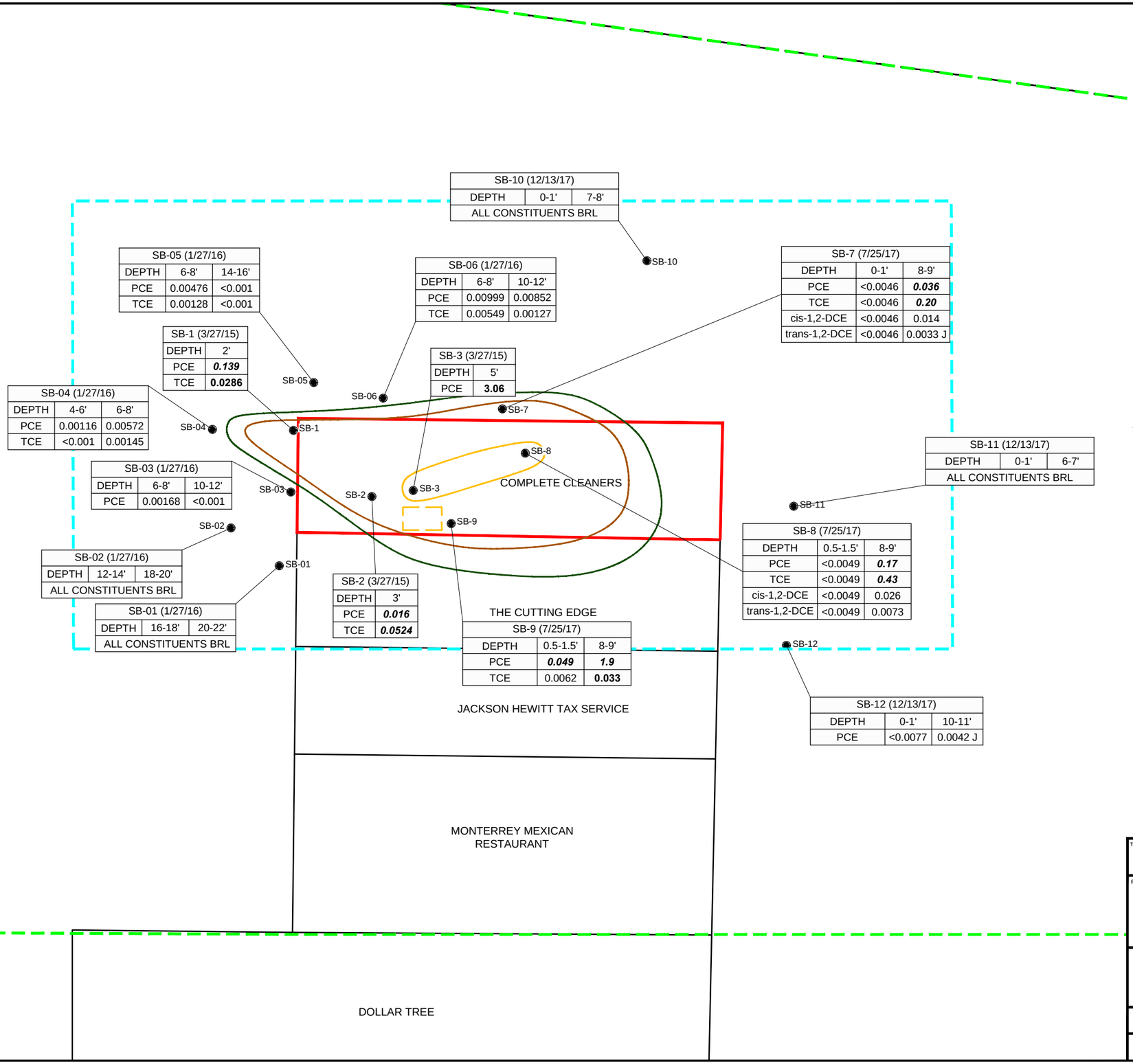
SITE MAP

COMPLETE CLEANERS
DSCA SITE ID DC790003
1537 FREEWAY DRIVE
REIDSVILLE, ROCKINGHAM COUNTY

hart hickman
SMARTER ENVIRONMENTAL SOLUTIONS
3921 Sunset Ridge Road, Suite 301
Raleigh, North Carolina 27607
919-847-4241(p) 919-847-4261(f)
License # C-1269 / #C-245 Geology

DATE: 3-31-20 | REVISION NO. 0

JOB NO. DS0-114 | FIGURE 2



NOTES:

1. **BOLD** INDICATES CONCENTRATION IS ABOVE PROTECTION OF GROUNDWATER PRELIMINARY SOIL REMEDIAITON GOALS (PSRGs) (0.0063 mg/kg FOR PCE AND 0.021 mg/kg FOR TCE).
2. *ITALIC* INDICATES CONCENTRATION IS ABOVE SITE SPECIFIC TARGET LEVELS (SSTLs) FOR PROTECTION OF GROUNDWATER USE PATHWAY (0.012 mg/KG FOR PCE AND 0.042 mg/kg FOR TCE).
3. ONLY DETECTED DRY-CLEANING CONSTITUENTS SHOWN.
4. J FLAG INDICATES ESTIMATED CONCENTRATION DETECTED BETWEEN METHOD DETECTION LIMIT & LABORATORY REPORTING LIMIT.
5. SOIL SAMPLES SB-1 THROUGH SB-3 COLLECTED ON 3/27/15 BY CBRE, INC. SB-01 THROUGH SB-06 COLLECTED ON 1/27/16 BY AECOM, INC. SB-7 THROUGH SB-9 COLLECTED ON 7/25/17 & SB-10 THROUGH SB-12 ON 12/13/17 BY H&H.
6. PCE = TETRACHLOROETHENE
   TCE = TRICHLOROETHENE
   DCE = DICHLOROETHENE
   BGS = BELOW GROUND SURFACE
   BRL = ALL CONSTITUENTS BELOW REPORTING LIMITS
7. CONTOURS ARE BASED ON MAXIMUM CONCENTRATIONS DETECTED AT ANY DEPTH.

N

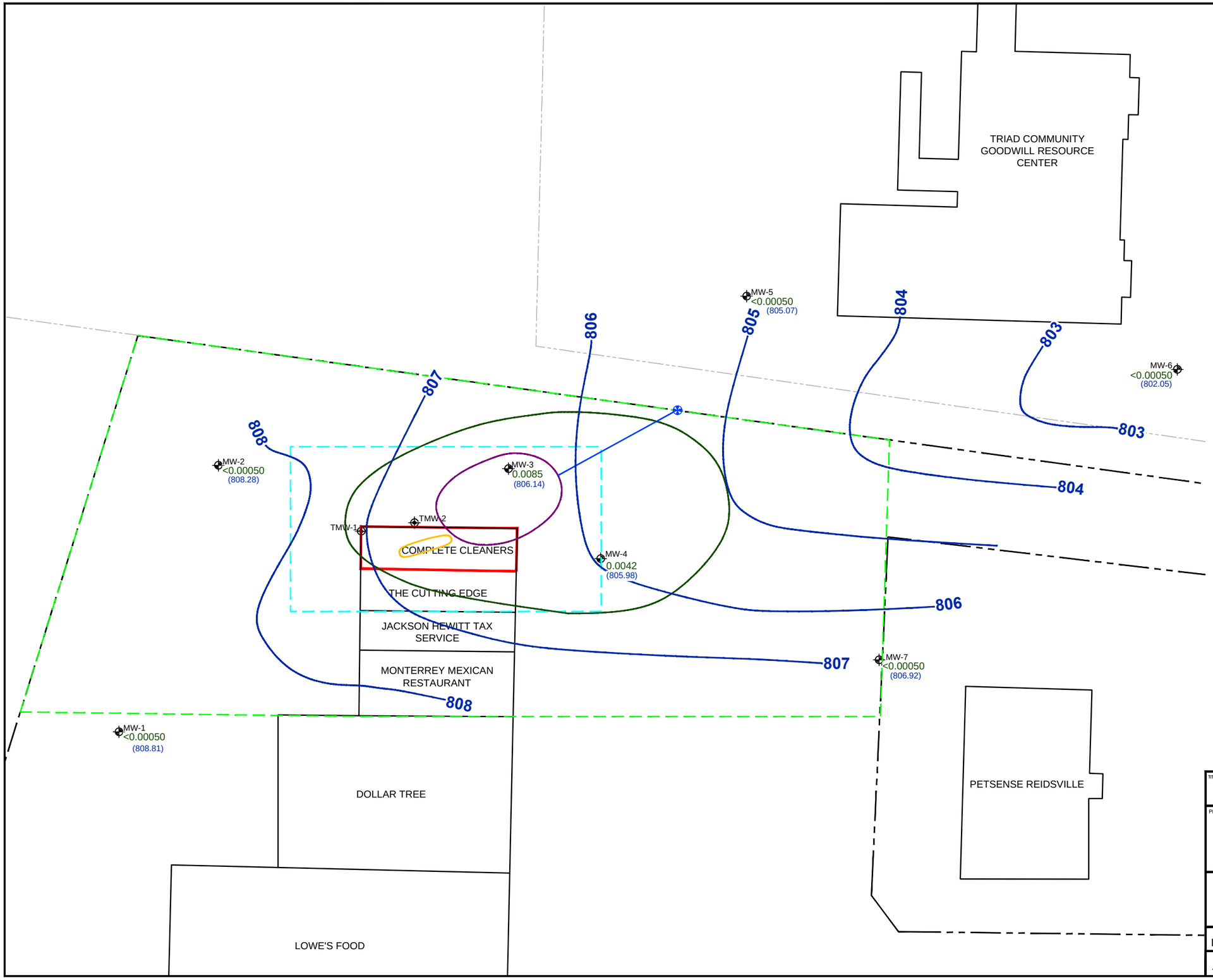
APPROXIMATE
0 20 40
SCALE IN FEET

TITLE
SOIL CONTAMINANT CONCENTRATION MAP

PROJECT
COMPLETE CLEANERS
DSCA SITE ID DC790003
1537 FREEWAY DRIVE
REIDSVILLE, ROCKINGHAM COUNTY

hart hickman
SMARTER ENVIRONMENTAL SOLUTIONS
3921 Sunset Ridge Road, Suite 301
Raleigh, North Carolina 27607
919-847-4241(p) 919-847-4261(f)
License # C-1269 / #C-245 Geology

DATE: 3-31-20 | REVISION NO. 0
JOB NO. DS0-114 | FIGURE 3



LEGEND

- COMPLETE CLEANERS FACILITY
- SOURCE PROPERTY BOUNDARY
- ADJACENT PARCEL BOUNDARY
- SHALLOW MONITORING WELL LOCATION
- TEMPORARY MONITORING WELL LOCATION
- 0.0083 PCE CONCENTRATION (mg/L)
- MAXIMUM EXTENT OF PCE IN GROUNDWATER ABOVE 2L STANDARD
- 806 GROUNDWATER ELEVATION CONTOUR (FT MSL) (DASHED WHERE INFERRED)
- (806.14) GROUNDWATER ELEVATION (FT MSL)
- EXPOSURE UNIT #1
- EXPOSURE UNIT #2
- GROUNDWATER SOURCE AREA
- SOIL SOURCE AREA
- PROTECTION OF GROUNDWATER POE

NOTE:

1. SAMPLES COLLECTED FROM MW-3, AND MW-4, AND MW-7 ON 7/19/18. SAMPLES COLLECTED FROM MW-1, MW-2, MW-5, AND MW-6 ON 7/20/18.
2. MONITORING WELLS GAUGED ON 7/19/18.

N

APPROXIMATE
0 50 100
SCALE IN FEET

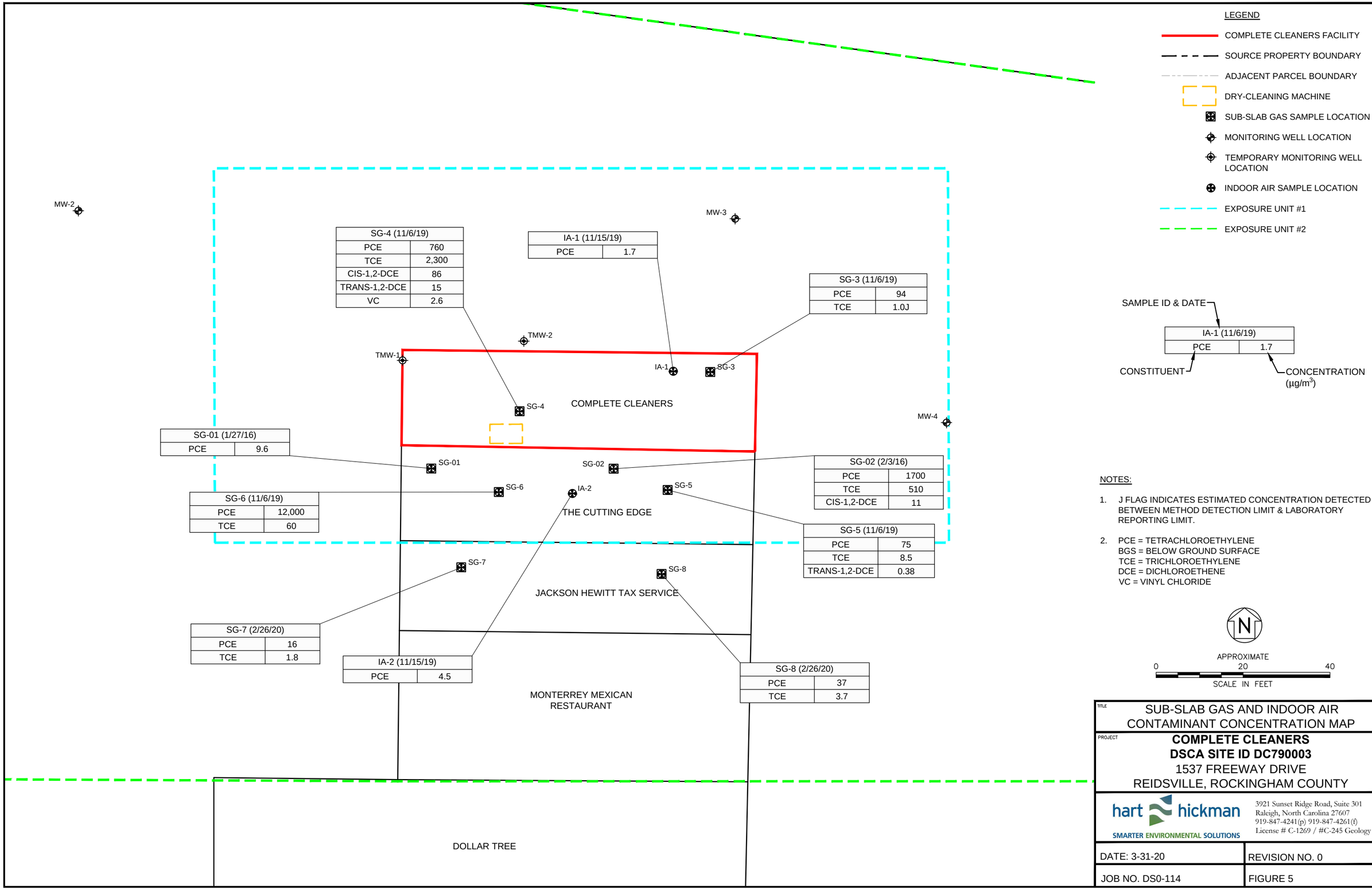
TITLE: GROUNDWATER CONTAMINANT CONCENTRATION MAP

PROJECT:
COMPLETE CLEANERS
DSCA SITE ID DC790003
1537 FREEWAY DRIVE
REIDSVILLE, ROCKINGHAM COUNTY

hart hickman
SMARTER ENVIRONMENTAL SOLUTIONS
3921 Sunset Ridge Road, Suite 301
Raleigh, North Carolina 27607
919-847-4241(p) 919-847-4261(f)
License # C-1269 / #C-245 Geology

DATE: 3-31-20 | REVISION NO. 0

JOB NO. DS0-114 | FIGURE 4



NOTES:

1. J FLAG INDICATES ESTIMATED CONCENTRATION DETECTED BETWEEN METHOD DETECTION LIMIT & LABORATORY REPORTING LIMIT.
2. PCE = TETRACHLOROETHYLENE
   BGS = BELOW GROUND SURFACE
   TCE = TRICHLOROETHYLENE
   DCE = DICHLOROETHENE
   VC = VINYL CHLORIDE

N

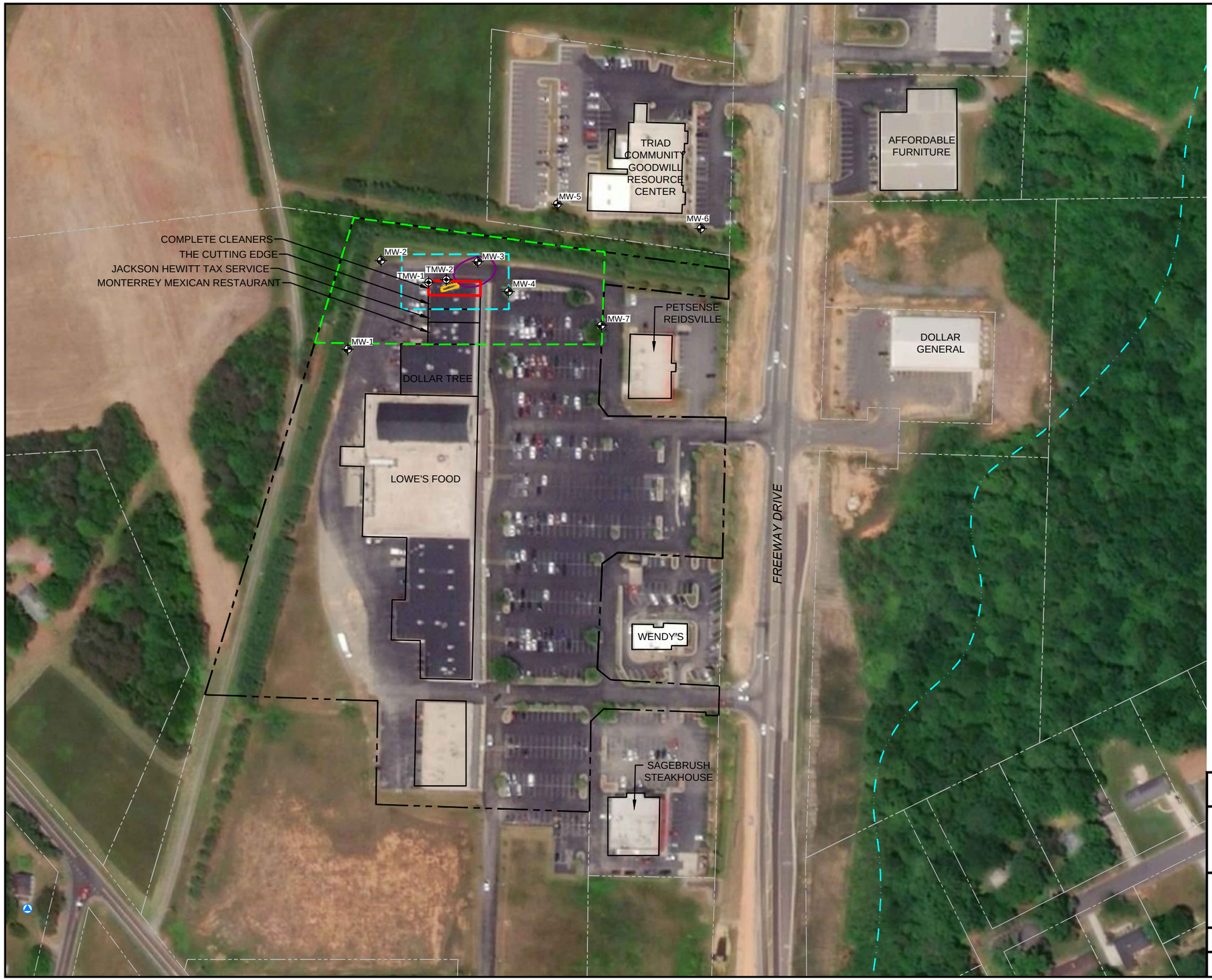
APPROXIMATE
0 20 40
SCALE IN FEET

TITLE
SUB-SLAB GAS AND INDOOR AIR CONTAMINANT CONCENTRATION MAP

PROJECT
COMPLETE CLEANERS
DSCA SITE ID DC790003
1537 FREEWAY DRIVE
REIDSVILLE, ROCKINGHAM COUNTY

hart hickman
SMARTER ENVIRONMENTAL SOLUTIONS
3921 Sunset Ridge Road, Suite 301
Raleigh, North Carolina 27607
919-847-4241(p) 919-847-4261(f)
License # C-1269 / #C-245 Geology

DATE: 3-31-20 | REVISION NO. 0
JOB NO. DS0-114 | FIGURE 5



LEGEND

- COMPLETE CLEANERS FACILITY
- SOURCE PROPERTY BOUNDARY
- ADJACENT PARCEL BOUNDARY
- SHALLOW MONITORING WELL LOCATION
- TEMPORARY MONITORING WELL LOCATION
- SOIL SOURCE AREA
- GROUNDWATER SOURCE AREA
- UNNAMED TRIBUTARY TO LITTLE TROUBLESOME CREEK
- SURFACE COVER, SOIL DISTURBANCE & VAPOR INTRUSION CONTROL AREA
- GROUNDWATER USE CONTROL AREA
- WATER SUPPLY WELL

NOTE:

1. AERIAL OBTAINED FROM ROCKINGHAM COUNTY GIS.

N

APPROXIMATE
0 150 300
SCALE IN FEET

LAND-USE CONTROL AREAS MAP

COMPLETE CLEANERS
DSCA SITE ID DC790003
1537 FREEWAY DRIVE
REIDSVILLE, ROCKINGHAM COUNTY

hart hickman
SMARTER ENVIRONMENTAL SOLUTIONS
3921 Sunset Ridge Road, Suite 301
Raleigh, North Carolina 27607
919-847-4241(p) 919-847-4261(f)
License # C-1269 / #C-245 Geology

DATE: 3-31-20	REVISION NO. 0
JOB NO. DS0-114	FIGURE 6

Appendix A
Plume Stability Demonstration

Table 8: Analytical Data for Groundwater **ADT 8**

DSCA ID No.: DC790003

Groundwater Sampling Point	Sampling Date (mm/dd/yy)	Benzene	cis-1,2-Dichloroethylene	Ethylbenzene	Methyl tert-butyl ether (MTBE)	Naphthalene	Tetrachloroethylene	Toluene	trans-1,2-Dichloroethylene	Trichloroethylene	Vinyl chloride	Xylenes (total)									
		[mg/L]																			
Permanent Monitoring Wells																					
MW-01	01/26/16	<0.001	<0.001	<0.001	<0.001	<0.0050	<0.001	<0.005	<0.001	<0.001	<0.001	<0.003									
	07/26/17	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
	07/20/18	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
MW-02	01/26/16	<0.001	<0.001	<0.001	<0.001	<0.0050	<0.001	<0.005	<0.001	<0.001	<0.001	<0.003									
	07/26/17	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
	07/20/18	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
MW-03	01/27/16	<0.001	<0.001	<0.001	<0.001	<0.0050	**0.00531**	<0.005	<0.001	0.0019	<0.001	<0.003									
	07/26/17	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	**0.0083**	<0.00050	<0.00050	0.002	<0.00050	<0.0015									
	12/14/17	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	**0.0065**	<0.00050	<0.00050	0.0017	<0.00050	<0.0015									
	04/27/18	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	**0.0068**	<0.00050	<0.00050	0.0021	<0.00050	<0.0015									
	07/19/18	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	**0.0085**	<0.00050	<0.00050	**0.0038**	<0.00050	<0.0015									
MW-04	01/27/16	<0.001	<0.001	<0.001	<0.001	<0.0050	**0.00121**	<0.005	<0.001	<0.001	<0.001	<0.003									
	07/26/17	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	**0.0030**	<0.00050	<0.00050	0.00061	<0.00050	<0.0015									
	07/19/18	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	**0.0042**	<0.00050	<0.00050	0.00098	<0.00050	<0.0015									
MW-5	07/26/17	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
	12/14/17	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
	04/27/18	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
	07/20/18	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
MW-6	07/26/17	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
	12/15/17	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
	04/27/18	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
	07/20/18	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
MW-7	12/15/17	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
	04/27/18	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									
	07/19/18	<0.00050	<0.00050	<0.00050	<0.00050	<0.0010	<0.00050	<0.00050	<0.00050	<0.00050	<0.00050	<0.0015									

Table 8: Analytical Data for Groundwater **ADT 8**

DSCA ID No.: DC790003

Groundwater Sampling Point	Sampling Date (mm/dd/yy)	Benzene	cis-1,2-Dichloroethylene	Ethylbenzene	Methyl tert-butyl ether (MTBE)	Naphthalene	Tetrachloroethylene	Toluene	trans-1,2-Dichloroethylene	Trichloroethylene	Vinyl chloride	Xylenes (total)									
		[mg/L]																			
Temporary Monitoring Wells																					
TMW-1	03/27/15	<0.001	<0.001	<0.001	<0.001	<0.001	**0.00403**	<0.001	<0.001	0.00122	<0.001	<0.005									
TMW-2	03/27/15	<0.001	<0.001	<0.001	<0.001	<0.001	**0.00264**	<0.001	<0.001	0.00223	<0.001	<0.005									
NC 2L Standard		0.001	0.07	0.6	0.02	0.006	0.0007	0.6	0.1	0.003	0.00003	0.5									

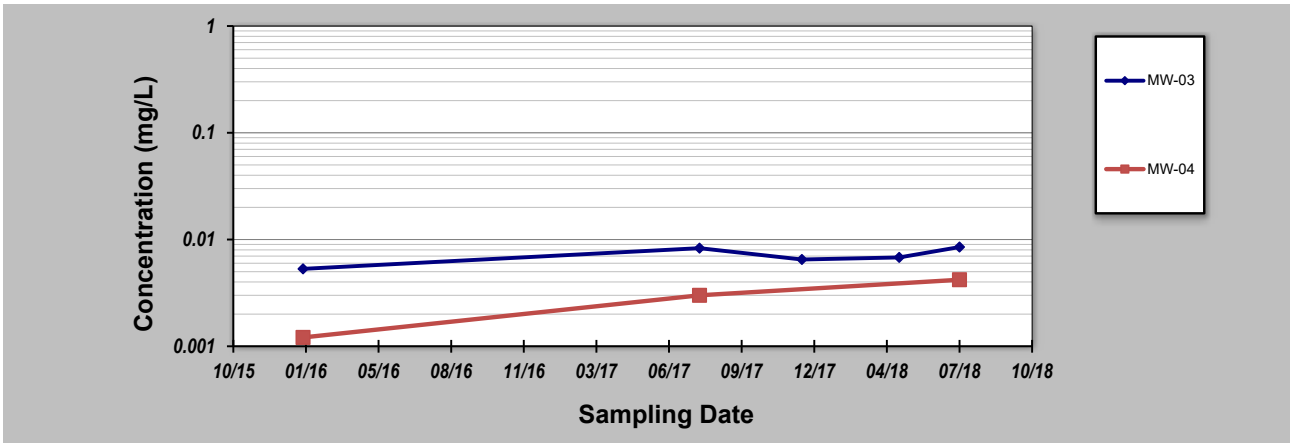
Notes:

1. **Bold** concentration exceeds NC 2L Groundwater Quality Standard (April 2013) or Interim Maximum Allowable Concentration (if 2L Standard not established).
2. J flag denotes estimated concentration between laboratory reporting limit and method detection limit.

GSI MANN-KENDALL TOOLKIT
for Constituent Trend Analysis

Evaluation Date:	5-Apr-21	Job ID:	DC790003
Facility Name:	Complete Cleaners	Constituent:	PCE - All events
Conducted By:	Hart & Hickman, PC	Concentration Units:	mg/L

Sampling Point ID:	MW-03	MW-04					
Sampling Event	Sampling Date	PCE - ALL EVENTS CONCENTRATION (mg/L)						
1	27-Jan-16	0.00531	0.00121					
2	26-Jul-17	0.0083	0.003					
3	14-Dec-17	0.0065						
4	27-Apr-18	0.0068						
5	19-Jul-18	0.0085	0.0042					
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
Coefficient of Variation:		0.19	0.54					
Mann-Kendall Statistic (S):		6	3					
Confidence Factor:		88.3%						
Concentration Trend:		No Trend						



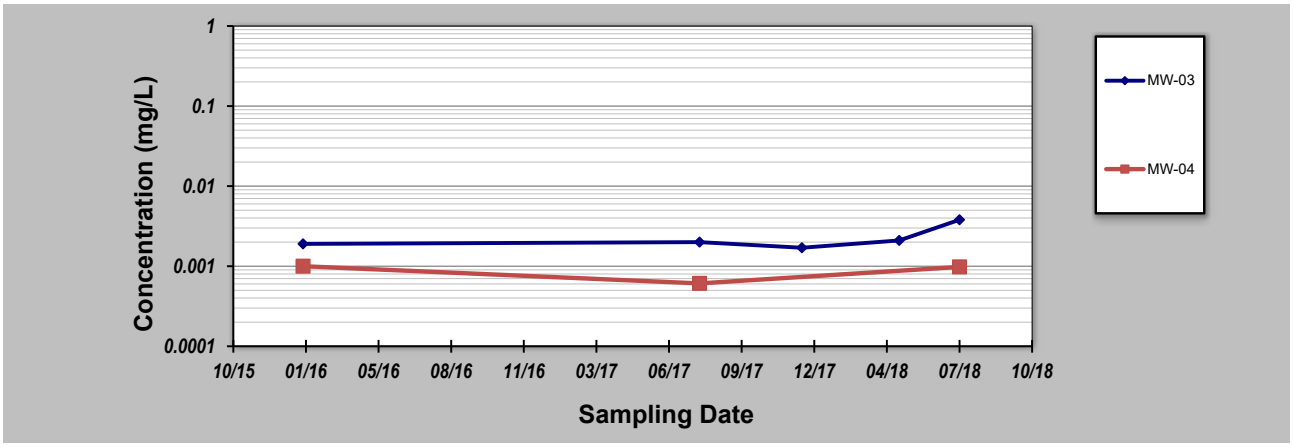
Notes:

1. At least four independent sampling events per well are required for calculating the trend. *Methodology is valid for 4 to 40 samples.*
2. Confidence in Trend = Confidence (in percent) that constituent concentration is increasing (S>0) or decreasing (S<0): >95% = Increasing or Decreasing; ≥ 90% = Probably Increasing or Probably Decreasing; < 90% and S>0 = No Trend; < 90%, S≤0, and COV ≥ 1 = No Trend; < 90% and COV < 1 = Stable.
3. Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

GSI MANN-KENDALL TOOLKIT
for Constituent Trend Analysis

Evaluation Date:	5-Apr-21	Job ID:	DC790003
Facility Name:	Complete Cleaners	Constituent:	TCE - All events
Conducted By:	Hart & Hickman, PC	Concentration Units:	mg/L

Sampling Point ID:	MW-03	MW-04					
Sampling Event	Sampling Date	TCE - ALL EVENTS CONCENTRATION (mg/L)						
1	27-Jan-16	0.0019	0.001					
2	26-Jul-17	0.002	0.00061					
3	14-Dec-17	0.0017						
4	27-Apr-18	0.0021						
5	19-Jul-18	0.0038	0.00098					
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
Coefficient of Variation:		0.37	0.25					
Mann-Kendall Statistic (S):		6	-1					
Confidence Factor:		88.3%						
Concentration Trend:		No Trend						



Notes:

1. At least four independent sampling events per well are required for calculating the trend. *Methodology is valid for 4 to 40 samples.*
2. Confidence in Trend = Confidence (in percent) that constituent concentration is increasing (S>0) or decreasing (S<0): >95% = Increasing or Decreasing; ≥ 90% = Probably Increasing or Probably Decreasing; < 90% and S>0 = No Trend; < 90%, S≤0, and COV ≥ 1 = No Trend; < 90% and COV < 1 = Stable.
3. Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

Appendix B

Level 1 Ecological Risk Assessment Checklists

Ecological Risk Assessment – Level 1
Checklist A – Potential Receptors and Habitat

Site / Location: Complete Cleaners, 1537 Freeway Drive, Reidsville, Rockingham County, NC
H&H Project No.: DS0-114F
DSCA Site ID DC790003

1. Are there navigable water bodies or tributaries to a navigable water body on or within a one-half mile radius of the site?

   Yes, two unnamed tributaries of Little Troublesome Creek are located approximately 900 feet southeast and 1,150 feet northwest of the dry-cleaning facility, respectively. The two tributaries discharge into Little Troublesome Creek, which discharges to the Haw River to the southeast. Additionally, two unnamed tributaries of Troublesome Creek/Lake Reidsville are located approximately 1,900 feet south-southwest and 2,300 feet southwest of the dry-cleaning facility, respectively. The two tributaries discharge into Troublesome Creek/Lake Reidsville, which discharges to the Haw River to the southeast of the dry-cleaning facility.

2. Are there any water bodies anywhere on or within one-half mile of the site?

   Yes, two unnamed tributaries of Little Troublesome Creek are located approximately 900 feet southeast and 1,150 feet northwest of the dry-cleaning facility, respectively. Additionally, two unnamed tributaries of Troublesome Creek/Lake Reidsville are located approximately 1,900 feet south-southwest and 2,300 feet southwest of the dry-cleaning facility, respectively.

3. Are there any wetland[1] areas such as marshes or swamps on or within one-half mile of the site?

   No, the U.S. Fish and Wildlife Service (USFWS) on-line National Wetlands Inventory does not identify wetland areas within a one-half mile radius of the dry-cleaning facility.

4. Are there any sensitive environmental areas[2] on or within one-half mile of the site?

   Yes, surface water bodies are located approximately 900 feet southeast, 1,150 feet northwest, 1,900 feet south-southwest, and 2,300 feet southwest of the dry-cleaning facility.

[1] Wetlands are defined in 40 CFR 232.2 as "areas inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances does support, a prevalence of vegetation typically adapted for life in saturated soil conditions." The sources to make the determination whether or not wetland areas are present may include, but not limited to, national wetland inventory available at http://nwi.fws.gov , federal or state agency, and USGS topographic maps.

[2] Areas that provide unique and often protected habitat for wildlife species. These areas are typically used during critical life stages such as breeding, hatching, rearing or young and overwintering. Refer to Attachment 1 for examples of sensitive environments.

5. Are there any areas on or within one-half mile of the site owned or used by local tribes?

   No, the Native American Consultation Database and the US Department of the Interior's on-line National Atlas do not identify any areas within a one-half mile radius of the source property owned or used by local tribes.

6. Are there any habitat, foraging area, or refuge by rare, threatened, endangered, candidate and/or proposed species (plants and animals), or any otherwise protected species on or within one-half mile of the site?

   Possible, the USFWS lists two endangered, one proposed threatened, one under review, and one candidate species in Rockingham County. The species identified by the USFWS include insects, fish, and freshwater invertebrates that can be found in and around surface water bodies or wetlands, such as those present within one-half mile of the source property. However, the USFWS Critical Habitat Mapper did not identify critical habitats on or within one-half mile of the source property.

7. Are there any breeding, roosting, or feeding areas used by migratory species on or within one-half mile of the site?

   Possible, the USFWS Information for Planning and Consultation (IPaC) lists six migratory bird species that may be present in Rockingham County and within the vicinity of the source property. Water bodies and wetlands, such as those present in the vicinity of the source property, are possible breeding, roosting, and feeding areas for migratory bird species.

8. Are there any ecologically[3], recreationally, or commercially important species on or within one-half mile of the site?

   Unlikely, recreational fishing is present in Rockingham County, but is unlikely to occur within one-half mile of the source property. In addition, the recreational and commercial trapping of nuisance species is possible in Rockingham County and several species, such as the beaver (*Castor canadensis*), are commonly found in North Carolina waterways; however, no information is available on the presence of such species in the vicinity of the source property.

9. Are there any threatened and/or endangered species (plant or animal) on or within one-half mile of the site?

   Possible, the USFWS indicates the presence of the James spinymussel (*Pleurobema collina*), Atlantic pigtoe (*Fusconaia masoni*), and Roanoke logperch (*Percina rex*) as proposed threatened and/or endangered species within Rockingham County.

If the answer is "Yes" to any of the above questions, then complete Level 1 Ecological Risk Assessment, Checklist B for Potential Exposure Pathways.

[3] Ecologically important species include populations of species which provide a critical food resource for higher organisms. Ecologically important species include pest and opportunistic species that populate an area if they serve as a food source for other species, but do not include domesticated animals or plants/animals whose existence is maintained by continuous human interventions.

Level 1 Ecological Risk Assessment
Checklist B for Potential Exposure Pathways
DSCA Site ID DC790003

1A. Can chemicals associated with the site leach, dissolve, or otherwise migrate to groundwater?

Yes. Tetrachloroethylene (PCE) and trichloroethylene (TCE) have been detected in groundwater at the site. The PCE and TCE plume has been defined and is limited to the area within approximately 85 feet of the dry-cleaning facility.

1B. Are chemicals associated with the site mobile in groundwater?

Yes. Chemical mobility is primarily influenced by the chemical solubility and soil-water partition coefficient. Based on these values, PCE and TCE are classified as moderately mobile (Fetter, 1988).

1C. Does groundwater from the site discharge to ecological receptor habitat?

Unlikely. The plume is adequately defined and confined to the area within approximately 110 feet of the dry-cleaning facility. The nearest ecological receptor habitats are in the area of an unnamed tributary of Little Troublesome Creek located approximately 800 feet southeast of the dry-cleaning facility.

Question 1. Could chemicals associated with the site reach ecological receptors through groundwater?

Unlikely. As discussed above, the chlorinated solvent plume has been delineated and does not extend in close proximity to the nearest ecological receptor habitats.

2A. Are chemicals present in surface soils on the site?

Yes. PCE, TCE, and acetone have been detected in surface soils. A few of the detected concentrations of PCE and TCE are above the applicable Preliminary Soil Remediation Goals (PSRGs).

2B. Can chemicals be leached from or be transported by erosion of surface soils on the site?

No. The impacted soils are covered by a concrete slab associated with the building and a paved asphalt parking lot.

Question 2. Could chemicals associated with the site reach ecological receptors through runoff or erosion?

No. The impacted soils are covered by a concrete slab associated with the building and a paved asphalt parking lot, which prevents runoff or erosion.

3A. Are chemicals present in surface soil or on the surface of the ground?

Yes. PCE, TCE, and acetone have been detected in surface soils. A few of the detected concentrations of PCE and TCE are above the applicable PSRGs.

3B. Are potential ecological receptors on the site?

No. The area of impacted soils is covered by a concrete slab associated with the building and a paved asphalt parking lot so ecological receptors are unlikely to be present.

Question 3. Could chemicals associated with the site reach ecological receptors through direct contact?

No. The area of impacted soils is covered by a concrete slab associated with the building and a paved asphalt parking lot so ecological receptors are unlikely to be present or come into contact with chemicals.

4A. Are chemicals on the site volatile?

Yes. PCE, TCE, and acetone are volatile compounds.

4B. Could chemicals on the site be transported in air as dust or particulate matter?

No. Impacted soils are covered by a concrete slab associated with the building and a paved asphalt parking lot.

Question 4. Could chemicals associated with the site reach ecological receptors through inhalation of volatilized chemicals or adhere chemicals to dust in ambient air or in subsurface burrows?

No. Impacted soils are covered by a concrete slab or a paved asphalt parking lot.

5A. Is Non-Aqueous Phase Liquids (NAPL) present at the site?

No. NAPL has not been encountered at the site.

5B. Is NAPL migrating?

No. NAPL has not been encountered at the site.

5C. Could NAPL discharge occur where ecological receptors are found?

No. NAPL has not been encountered at the site.

Question 5. Could chemicals associated with the site reach ecological receptors through migration of NAPL?

No. NAPL has not been encountered at the site.

6A. Are chemicals present in surface and shallow subsurface soils or on the surface of the ground?

Yes. PCE, TCE, and acetone have been detected in surface and shallow subsurface soils. A few of the detected concentrations of PCE and TCE are above the applicable PSRGs.

6B. Are chemicals found in soil on the site taken up by plants growing on the site?

No. Impacted soils are covered by a concrete slab or an asphalt paved parking area.

6C. Do potential ecological receptors on or near the site feed on plants (e.g., grasses, shrubs, forbs, trees, etc.) found on the site?

Unlikely. Impacted soils are covered by a concrete slab or an asphalt paved parking area so no significant vegetation is present.

6D. Do chemicals found on the site bioaccumulate?

Unlikely. Based on published references (U.S. Agency for Toxic Substances and Disease Registry), PCE has a low bioaccumulation potential and TCE has a low to moderate bioaccumulation potential.

Question 6. Could chemicals associated with the site reach ecological receptors through direct ingestion of soil, plants, animals, or contaminants?

No. Impacted soils are covered by a concrete slab or an asphalt paved parking area, the groundwater plume does not intersect surface water, and the constituents of concern do not have a high bioaccumulation potential. As such, it is unlikely that direct ingestion of plants or animals would occur.

Attachment 1
Examples of Sensitive Environments
DSCA Site ID DC790003

Examples of environmentally sensitive areas include, but are not limited to, the following:

- National parks and national monuments, ***None near site***
- Designated or administratively proposed federal wilderness areas, ***None near site***
- National preserved, ***None near site***
- National or state wildlife refuges, ***None near site***
- National lakeshore recreational areas, ***None near site***
- Federal land designated for protection of natural ecosystems, ***None near site***
- State land designated for wildlife or game management, ***None near site***
- State designated natural areas, ***None near site***
- Federal or state designated scenic or wild river, ***None near site***
- All areas that provide or could potentially provide critical habitat for state and federally listed threatened or endangered species, those species that are currently petitioned for listing, and species designated by other agencies as sensitive or species of concern, ***None near site***
- Marine sanctuary, ***None near site***
- Areas identified under the coastal zone management act, ***None near site***
- Sensitive areas identified under the national estuary program or near coastal waters program, ***None near site***
- Critical areas identified under the clean lakes program, ***None near site***
- National seashore recreational area, ***None near site***
- Habitat known to be used by federal designated or proposed endangered or threatened species, ***Possible habitats in the unnamed tributaries of Little Troublesome Creek located 900 feet southeast and 1,150 feet northwest, and in the unnamed tributaries of Troublesome Creek located 1,900 feet south-southwest and 2,300 feet southwest of the dry-cleaning facility.***
- Unit of coastal barrier resources system, ***None near site***
- Coastal barrier (undeveloped), ***None near site***

- Spawning areas critical for the maintenance of fish/shellfish species within river, lake, or coastal tidal waters, ***Possible habitats in the unnamed tributaries of Little Troublesome Creek located 900 feet southeast and 1,150 feet northwest, and in the unnamed tributaries of Troublesome Creek located 1,900 feet south-southwest and 2,300 feet southwest of the dry-cleaning facility.***
- Migratory pathways and feeding areas critical for maintenance of anadromous fish species within river reaches or areas in lakes or coastal tidal waters in which the fish spend extended periods of time, ***Possible habitats in the unnamed tributaries of Little Troublesome Creek located 900 feet southeast and 1,150 feet northwest, and in the unnamed tributaries of Troublesome Creek located 1,900 feet south-southwest and 2,300 feet southwest of the dry-cleaning facility. However, it is unlikely that anadromous fish species would utilize these water bodies.***
- Terrestrial areas utilized for breeding by large of dense aggregations of animals, ***None near site***
- National river reach designated as recreational, ***None near site***
- Habitat known to be used by state designated endangered or threatened species, ***Possible habitats in the unnamed tributaries of Little Troublesome Creek located 900 feet southeast and 1,150 feet northwest, and in the unnamed tributaries of Troublesome Creek located 1,900 feet south-southwest and 2,300 feet southwest of the dry-cleaning facility.***
- Habitat known to be used by species under review as to its federal endangered or threatened state, ***Possible habitats in the unnamed tributaries of Little Troublesome Creek located 900 feet southeast and 1,150 feet northwest, and in the unnamed tributaries of Troublesome Creek located 1,900 feet south-southwest and 2,300 feet southwest of the dry-cleaning facility.***
- Coastal barrier (partially developed), ***None near site***
- Particular areas, relatively small in size, important to maintenance of unique biotic communities, ***None near site***
- State designated areas for protection or maintenance of aquatic life, ***None near site***
- Wetlands, ***None near site***

U.S. Fish and Wildlife Service
National Wetlands Inventory

Wetlands

March 15, 2021

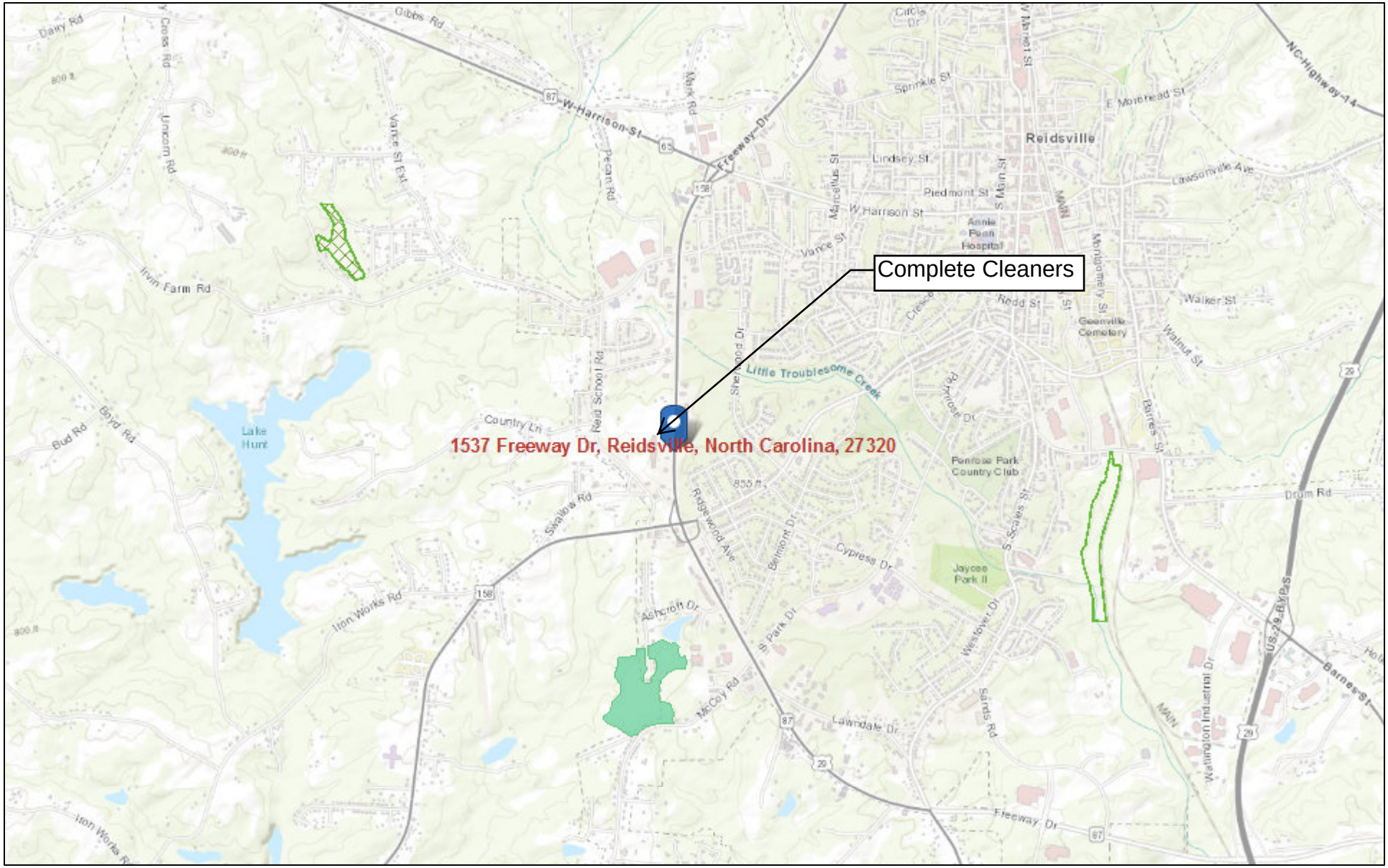
Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

Natural Heritage Program Managed Areas



March 15, 2021

1:50,293

0 0.425 0.85 1.7 mi

0 0.5 1 2 km

Managed Areas

- Dedicated Nature Preserve
- Registered Heritage Area
- Conservation Easement
- Other Protection
- Federal Ownership
- State Ownership
- Local Government Ownership
- Private

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri

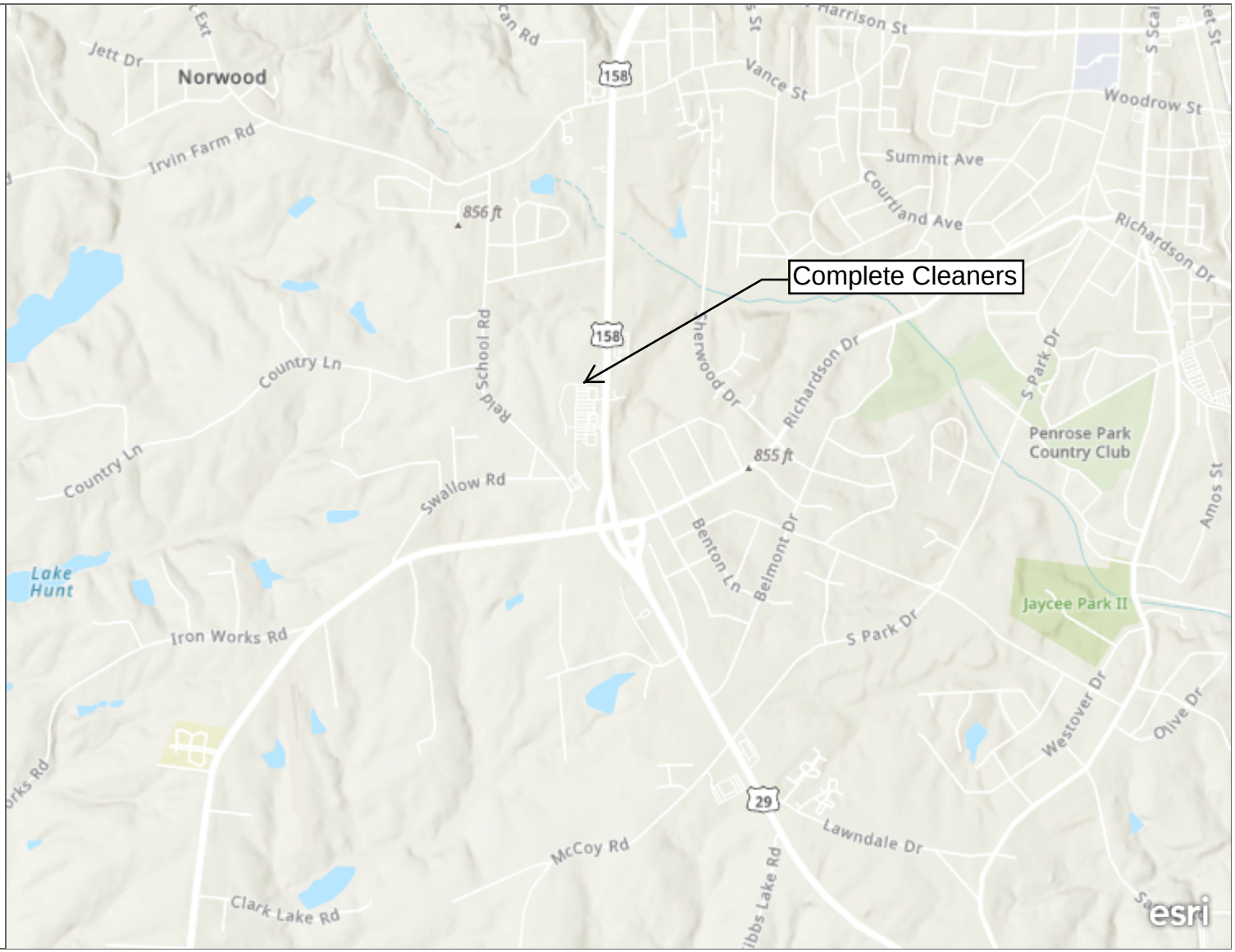
Critical Habitat for Threatened and Endangered Species

FWS HQ ES Critical Habitat - Critical Habitat - Linear Features - Final

FWS HQ ES Critical Habitat - Critical Habitat - Polygon Features - Final

FWS HQ ES Critical Habitat - Critical Habitat - Linear Features - Proposed

FWS HQ ES Critical Habitat - Critical Habitat - Polygon Features - Proposed



Esri, NASA, NGA, USGS, FEMA | Esri Community Maps Contributors, State of North Carolina DOT, Esri, HERE, Garmin, SafeGraph, INCREMENT P, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA | The data found in this file were developed by the U.S. Fish & Wildlife Service field offices. For more information please refer to the species level metadata found with the individual shapefiles. The ECOS Joint Development Team is responsible for creating and serving this conglomerate file. No data alterations are made by ECOS.

U.S. Fish & Wildlife Service

ECOS

ECOS / Species Reports / Species County Report

Listed species believed to or known to occur in Rockingham, North Carolina

The following report contains Species that are known to or are believed to occur in this county. Species with range unrefined past the state level are now excluded from this report. If you are looking for the Section 7 range (for Section 7 Consultations), please visit theIPaC application.

CSV

Show 10 entries

Search:

5 Species Listings

Group	Name	Population	Status	Lead Office	Recovery Plan	Recovery Plan Action Status
Insects	monarch butterfly (Danaus plexippus)	Wherever found	Candidate	3		
Clams	Green floater (Lasmigona subviridis)	Wherever found	Under Review	5		
Clams	Atlantic pigtoe (Fusconaia masoni)	Wherever found	Proposed Threatened	4		
Clams	James spinymussel (Pleurobema collina)	Wherever found	Endangered	5	James Spinymussel	Implementation Progress

Group	Name	Population	Status	Lead Office	Recovery Plan	Recovery Plan Action Status
Fishes	Roanoke logperch (Percina rex)	Wherever found	Endangered	5	Roanoke Logperch	Implementation Progress

Showing 1 to 5 of 5 entries

Previous 1 Next

IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Rockingham County, North Carolina

Local office

Raleigh Ecological Services Field Office

(919) 856-4520
(919) 856-4556

MAILING ADDRESS
Post Office Box 33726
Raleigh, NC 27636-3726

PHYSICAL ADDRESS
551 Pylon Drive, Suite F
Raleigh, NC 27606-1487

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Clams

NAME	STATUS
James Spinymussel Pleurobema collina Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/2212	Endangered

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.

2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php
- Measures for avoiding and minimizing impacts to birds http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php
- Nationwide conservation measures for birds http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE"

INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)

Bald Eagle Haliaeetus leucocephalus
This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.
https://ecos.fws.gov/ecp/species/1626
Breeds Sep 1 to Jul 31

Prairie Warbler Dendroica discolor
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
Breeds May 1 to Jul 31

Prothonotary Warbler Protonotaria citrea
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
Breeds Apr 1 to Jul 31

Red-headed Woodpecker Melanerpes erythrocephalus
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
Breeds May 10 to Sep 10

Rusty Blackbird Euphagus carolinus
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
Breeds elsewhere

Wood Thrush Hylocichla mustelina
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
Breeds May 10 to Aug 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or

attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the AKN Phenology Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets .

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The Cornell Lab of Ornithology All About Birds Bird Guide, or (if you are unsuccessful in locating the bird of interest there), the Cornell Lab of Ornithology Neotropical Birds guide. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

THERE ARE NO KNOWN WETLANDS AT THIS LOCATION.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Appendix C

Notice of Dry-Cleaning Solvent Remediation

Source Property: ACI Freeway Crossing, LLC, PIN 799415533043

NOTICE OF DRY-CLEANING SOLVENT REMEDIATION

Property Owner: ACI Freeway Crossing, LLC
Recorded in Book _____, Page _____
Associated plat recorded in Plat Book _____, Page _____

This documentary component of a Notice of Dry-Cleaning Solvent Remediation (hereinafter "Notice") is hereby recorded on this ____ day of _____, 20____ by ACI Freeway Crossing, LLC (hereinafter "Property Owner"). The survey plat component of the Notice is being recorded concurrently with this documentary component. The real property (hereinafter "Property") which is the subject of this Notice is located at 1537 Freeway Drive, Reidsville, Rockingham County, North Carolina, Parcel Identification Number (PIN) 799415533043.

The Property is contaminated with dry-cleaning solvent, as defined at North Carolina General Statutes (hereinafter "N.C.G.S."), Section (hereinafter "§") 143-215.104B(b)(9) and other contaminants. This Notice has been approved by the North Carolina Department of Environmental Quality, or its successor in function (hereinafter "DEQ") under the authority of the Dry-Cleaning Solvent Cleanup Act of 1997, as amended, N.C.G.S. § 143-215.104A *et seq.* (hereinafter "DSCA"), and is required to be filed in the Register of Deeds' Office in the county or counties in which the land is located, pursuant to NCGS § 143-215.104M.

Soil and groundwater at the Property is contaminated with dry-cleaning solvents associated with dry-cleaning operations at the Complete Cleaners (DSCA Site ID DC790003) located at 1537 Freeway Drive, Reidsville in the Freeway Crossing Shopping Center. Dry-cleaning operations were conducted on the Property from approximately 1998 to 2015 using the dry-cleaning solvent tetrachloroethylene.

Pursuant to N.C.G.S. § 143-215.104M, this Notice is being filed in order to reduce or eliminate the danger to public health or the environment posed by the Property. Attached hereto as **Exhibit A** is a reduction, to 8 1/2" x 11", of the survey plat component of the Notice required by N.C.G.S. § 143-215.104M. The survey plat has been prepared and certified by a professional land surveyor and meets the requirements of G.S. 47-30, and contains the following information required by N.C.G.S. § 143-215.104M:

(1) A description of the location and dimensions of the areas of potential environmental concern with respect to permanently surveyed benchmarks; and
(2) The type, location and quantity of regulated dry-cleaning solvent contamination and other contaminants known to exist on the Property.

Attached hereto as **Exhibit B,** is a legal description of the Property that would be sufficient as a description in an instrument of conveyance.

Pursuant to NCGS § 143-215.104M, a certified copy of this Notice must be filed within 15 days of receipt of DEQ's approval of the Notice or the effective date of the dry-cleaning solvent remediation agreement, whichever is later. Pursuant to NCGS § 143-215.104M, the copy of the Notice certified by DEQ must be recorded in the grantor index under the names of the owners of the land.

LAND-USE RESTRICTIONS

NCGS § 143-215.104M requires that the Notice identify any restrictions on the current and future use of the Property that are necessary or useful to maintain the level of protection appropriate for the designated current or future use of the Property and that are designated in the dry-cleaning remediation agreement. The restrictions shall remain in force in perpetuity unless canceled by the Secretary of DEQ, or his/her designee, after the hazards have been eliminated, pursuant to NCGS §143-215.104M. Those restrictions are hereby imposed on the Property, and are as follows:

1. Without prior written approval from DEQ, the Property shall not be used for:

    a. child care centers or schools; or
    b. mining or extraction of coal, oil, gas or any mineral or non-mineral substances.

2. No activities that encounter, expose, remove or use groundwater (for example, installation of water supply wells, fountains, ponds, lakes or swimming pools that use groundwater, or construction or excavation activities that encounter or expose groundwater) may occur in "Areas A and B" on the Property without prior approval of DEQ.

3. Soil in "Area B" may not be removed or disturbed unless approved in writing in advance by DEQ or its successor in function, except for routine landscape maintenance and emergency utility repair. In the event of emergency utility repair, DEQ shall be given written notice of any such emergency repair no later than the next business day, and further related assessment and remedial measures may be required.

4. Except for routine maintenance, no construction activities or change in property use in "Area B" that cause or create an unacceptable human health risk from vapor intrusion may occur on the Property without prior approval of DEQ. These activities include but are not limited to: construction of new buildings, removal and construction of part of a building, construction of sub-grade structures that encounter contaminated soil or places building users in close proximity to contaminated groundwater, change from non-residential to residential property, change in tenant space usage, and addition of residential property use on higher floors.

5. Structural modifications in "Area B" that may cause or create an increased risk from vapor intrusion require the property owner to demonstrate to the satisfaction of DEQ that the indoor air in the structure does not pose an unacceptable risk to the occupants following modifications. These modifications include but are not limited to: modification or

replacement of heating, ventilation or air conditioning (HVAC) systems, removal or replacement of the building slab, installation of multiple conduits or piping through the building slab, modifications to building walls or ceilings that may change air flow.

6. No activities that cause or create an increase in infiltration (for example, removal or demolition of materials such as asphalt, concrete, buildings, or other structures that by their use and nature minimize infiltration of rain or water runoff into potentially contaminated soil) may occur in "Area B" of the Property, as shown on Exhibit A, without prior approval of DEQ.

7. In January of each year, on or before January 31st, the owner of any portion of the Property shall submit a notarized Annual Certification of Land-Use Restrictions to DEQ certifying that this Notice remains recorded at the Register of Deeds' office, and that the land-use restrictions are being complied with.

8. No person conducting environmental assessment or remediation at the Property or involved in determining compliance with applicable land-use restrictions, at the direction of, or pursuant to a permit or order issued by DEQ may be denied access to the Property for the purpose of conducting such activities.

9. The owner of any portion of the Property shall cause the instrument of any sale, lease, grant, or other transfer of any interest in the property to include a provision expressly requiring the lessee, grantee, or transferee to comply with this Notice. The failure to include such a provision shall not affect the validity or applicability of any land-use restriction in this Notice.

RIGHT OF ENTRY

The property owner grants and conveys to DEQ, its agents, contractors, and employees, and any person performing pollution remediation activities under the direction of DEQ, access at reasonable times and under reasonable security requirements to the Property to determine and monitor compliance with the land-use restrictions set forth in this Notice. Such investigations and actions are necessary by DEQ to ensure that use, occupancy, and activities of and at the Property are consistent with the land-use restrictions and to ensure that the structural integrity and continued effectiveness of any engineering controls (if appropriate) described in the Notice are maintained. Whenever possible, at least 48 hours advance notice will be given to the Property Owner prior to entry. Advance notice may not always be possible due to conditions such as response time to complaints and emergency situations.

REPRESENTATIONS AND WARRANTIES

The Property Owner hereby represents and warrants to the other signatories hereto:

i) that the Property Owner is the sole owner of the Property; **or** that the Property Owner has provided to DEQ the names of all other persons that own an interest in or hold an encumbrance on the Property and have notified such persons of the Property Owner's intention to enter into this Notice;

ii) that the Property Owner has the power and authority to enter into this Notice, to grant the rights and interests herein provided and to carry out all obligations hereunder; and

iii) that this Notice will not materially violate or contravene or constitute a material default under any other agreement, document or instrument to which the Property Owner is a party or by which the Property Owner may be bound or affected.

ENFORCEMENT

The above land-use restrictions shall be enforceable without regard to lack of privity of estate or contract, lack of benefit to particular land, or lack of any property interest in particular land. The land-use restrictions shall be enforced by any owner of the Property. The land-use restrictions may also be enforced by DEQ through the remedies provided in NCGS § 143-215.104P or by means of a civil action; by any unit of local government having jurisdiction over any part of the Property; and by any person eligible for liability protection under the DSCA who will lose liability protection if the restrictions are violated. Any attempt to cancel any or all of this Declaration without the approval of the Secretary of DEQ (or its successor in function), or his/her delegate, shall be subject to enforcement by DEQ to the full extent of the law. Failure by any party required-or authorized to enforce any of the above restrictions shall in no event be deemed a waiver of the right to do so thereafter as to the same violation or as to one occurring prior or subsequent thereto.

If a land-use restriction set out in this Notice required under NCGS § 143-215.104.M is violated, the owner of the Property at the time the land-use restriction is violated, the owner's successors and assigns, and the owner's agents who direct or contract for alteration of the contamination site in violation of a land-use restriction shall be liable for remediation of all contaminants to unrestricted use standards.

FUTURE SALES, LEASES, CONVEYANCES AND TRANSFERS

When any portion of the Property subject to this Notice is sold, leased, conveyed or transferred, the deed or other instrument of transfer shall contain in the description section, in no smaller type than that used in the body of the deed or instrument, (1) a statement that the property has been contaminated with dry-cleaning solvent and, if appropriate, cleaned up under the Act and (2) a reference by book and page to the recordation of this Notice.

The Property Owner shall notify DEQ within fourteen (14) calendar days of the effective date of any conveyance, grant, gift, or other transfer, whole or in part, of the Property Owner's interest in the Property. This notification shall include the name, business address and phone number of the transferee and the expected date of transfer.

The Property Owner shall notify DEQ within thirty (30) days following the petitioning or filing of any document by any person initiating a rezoning of the Property that would change the base zone of the Property.

This provision shall not apply to leases that do not provide for the right to take actions that would violate the prohibitions and restrictions of this Notice.

PROPERTY OWNER SIGNATURE

IN WITNESS WHEREOF, Property Owner has caused this instrument to be duly executed this ___ day of _____, 20___.

ACI Freeway Crossing, LLC

By: _____
Name of contact

STATE OF _____
COUNTY OF _____

I, _____, a Notary Public of the county and state aforesaid, certify that _____ personally came before me this day and acknowledged that he/she is a Member of ACI Freeway Crossing, LLC, a North Carolina limited liability corporation, and its Manager, and that by authority duly given and as the act of the company, the foregoing Notice of Dry-Cleaning Solvent Remediation was signed in its name by him.

WITNESS my hand and official stamp or seal, this ___ day of _____, 20___.

_____
Name typed or printed
Notary Public

My Commission expires: _____
[Stamp/Seal]

APPROVAL AND CERTIFICATION

The foregoing Notice of Dry-Cleaning Solvent Remediation is hereby approved and certified.

North Carolina Department of Environmental Quality

By: _____ _____
Jim Bateson, LG — Date
Chief, Superfund Section
Division of Waste Management

ATTACHMENT

LIMITED POWER OF ATTORNEY

I _____"Property Owner", do hereby grant a limited power of attorney to DEQ and to DEQ's independent contractors, as follows:

DEQ and DEQ's independent contractors shall have the limited power of attorney to record this Notice, including its documentary and survey plat components, in accordance with N.C.G.S. § 143-215.104M on my "Property Owner" behalf. This limited power of attorney shall terminate upon completion of the recordation of the Notice.

Signature of Property Owner _____

Dated this _____ day of _____, 20___.

STATE OF _____
COUNTY OF _____

I, _____, a Notary Public, do hereby certify that _____ personally appeared before me this day and signed this "Limited Power of Attorney".

WITNESS my hand and official stamp or seal, this ___ day of _____, 20___.

_____
Name typed or printed
Notary Public

My Commission expires: _____
[Stamp/Seal]

CERTIFICATION OF REGISTER OF DEEDS

The foregoing documentary component of the Notice of Dry-Cleaning Solvent Remediation, and the associated plat, are certified to be duly recorded at the date and time, and in the Book and on the Page(s), shown on the first page hereof.

Register of Deeds for Rockingham County

By: _____ _____
(signature) Date

Name typed or printed: _____
Deputy/Assistant Register of Deeds

EXHIBIT A
REDUCTION OF SURVEY PLAT

NOTES:

1. THE FIRM HAS NEITHER REVIEWED, NOR RELIED UPON A TITLE COMMITMENT OR ANY TITLE REPORT IN AND WHILE PREPARING THIS SURVEY AND THE CLIENT SHOULD NOT RELY UPON THIS SURVEY AS ASSURANCE OF OWNERSHIP, AS A GUARANTEE OF MARKETABLE TITLE OR FOR DISCLOSURE OF TITLE EXCEPTIONS THAT MAY, COULD OR DO ENCUMBER THE PROPERTY. THE CLIENT MUST ENGAGE A TITLE AGENT/TITLE INSURANCE COMPANY FOR REVIEW AND CONFIRMATION OF, AND INSURANCE REGARDING MARKETABLE TITLE.
2. AREAS COMPUTED BY COORDINATE METHOD.
3. PROPERTY SHOWN HEREON IS SUBJECT TO ALL RIGHTS-OF-WAY, EASEMENTS AND RESTRICTIONS OF RECORD.
4. ALL DISTANCES SHOWN ON SURVEY ARE HORIZONTAL GROUND DISTANCES UNLESS OTHERWISE NOTED.
5. RIGHTS-OF-WAY INFORMATION IS BASED ON DEEDS AND MAPS OF RECORD.
6. NC GRID COORDINATES (NAD83) OBTAINED BY USING GPS, PER THE NCVRS NETWORK.
7. BASIS OF BEARING SHOWN HEREON IS NC GRID (NAD 83 NSRS 2011).
8. VERTICAL DATUM SHOWN HEREON IS NAVD88.
9. THE PROPERTY SHOWN HEREON IS LOCATED IN THE FOLLOWING FLOODZONES:, ZONE X, AREA OF MINIMAL FLOOD HAZARD, PER FLOOD INSURANCE RATE MAP 3710799400J, PANEL 9400 EFFECTIVE DATE JULY 3, 2007.
10. THE AREAS AND TYPE OF CONTAMINATION DEPICTED UPON THE MAP ARE APPROXIMATIONS DERIVED FROM THE BEST AVAILABLE INFORMATION AT THE TIME OF FILING.
11. SOIL BORINGS SHOWN ON THE SURVEY ARE PER MAP PROVIDED BY HART & HICKMAN, PC. DATED 02/20/2018

REFERENCES:

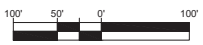
PB 16 PG 11
PB 34 PG 1
PB 39 PG 46
PB 56 PG 21
DB 951 PG 2048
DB 951 PG 2065
DB 960 PG 1060
DB 975 PG 751
DB 1115 PG 1549
DB 1408 PG 2164
DB 1463 PG 1267
DB 1487 PG 786
DB 1606 PG 1744

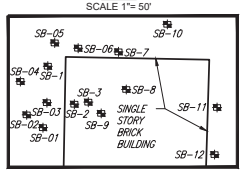
REVIEW OFFICER'S CERTIFICATE
STATE OF NORTH CAROLINA
COUNTY OF ROCKINGHAM

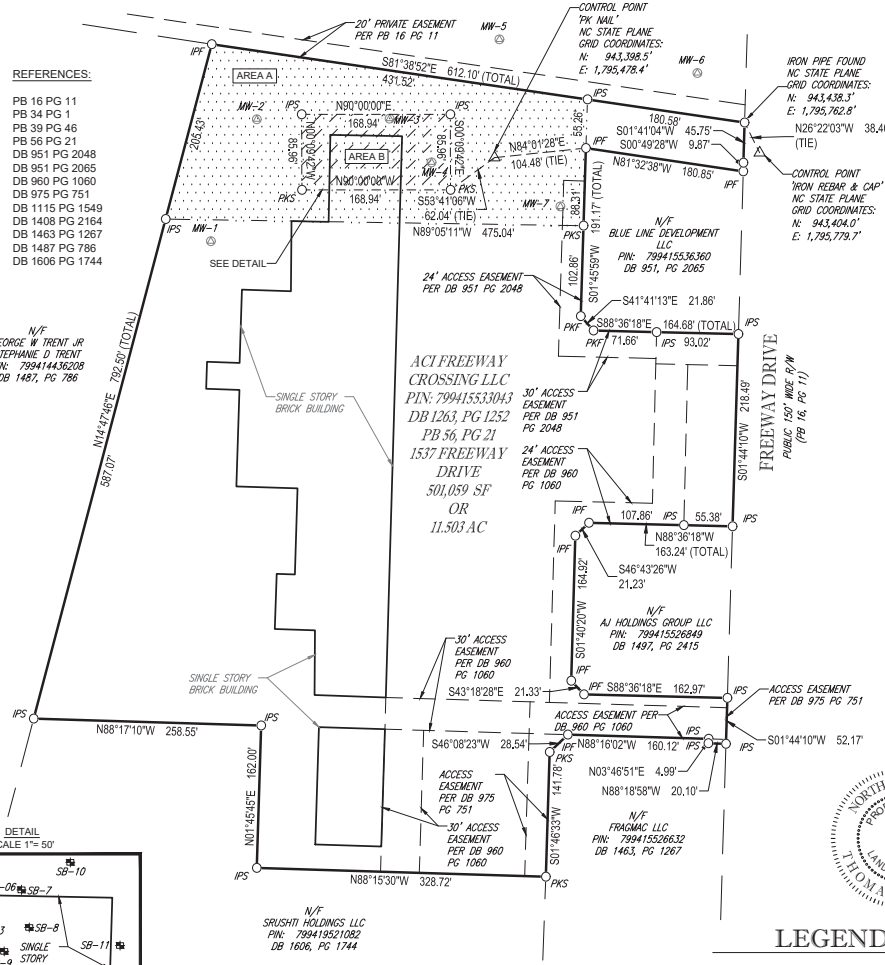
I, _____ REVIEW OFFICER OF ROCKINGHAM COUNTY, CERTIFY THAT THE MAP OR PLAT TO WHICH THIS CERTIFICATION IS AFFIXED MEETS ALL STATUTORY REQUIREMENTS FOR RECORDING.

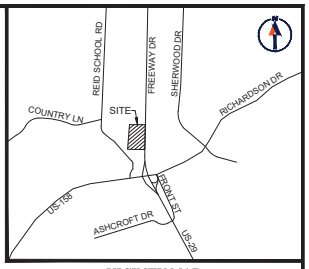
_____ _____
REVIEW OFFICER DATE

COORDINATE SYSTEM: US STATE PLANE 1983 ZONE: NORTH CAROLINA 3200 HORIZONTAL DATUM: NAD 83 (2011) VERTICAL DATUM: NAVD 88 (GEOID 2012 CONUS) UNIT OF MEASURE: US SURVEY FEET			
WELL ID	GRID NORTHING	GRID EASTING	TOP OF CASING ELEVATION
MW-1	943303.61	1795156.03	837.83
MW-2	943442.13	1795208.26	837.52
MW-3	943442.83	1795359.15	837.84
MW-4	943393.16	1795406.82	839.20
MW-5	943532.94	1795483.98	821.60
MW-6	943494.66	1795709.00	821.32
MW-7	943343.14	1795553.29	836.65









VICINTY MAP
NOT TO SCALE

DEED STATEMENT

N.C.G.S. 143-215.104M(d) REQUIRES THAT WHEN PROPERTY FOR WHICH A NOTICE OF DRY-CLEANING SOLVENT REMEDIATION HAS BEEN FILED IS SOLD, LEASED, CONVEYED, OR TRANSFERRED, THE DEED OR OTHER INSTRUMENT OF TRANSFER SHALL CONTAIN IN THE DESCRIPTION SECTION, IN NO SMALLER TYPE THAN THAT USED IN THE BODY OF THE DEED OR INSTRUMENT, A STATEMENT THAT THE PROPERTY HAS BEEN CONTAMINATED WITH DRY-CLEANING SOLVENT AND, IF APPROPRIATE CLEANED UP UNDER THIS PART. USE THE FOLLOWING STATEMENT TO SATISFY N.C.G.S. 143-215.104(d):

THIS PROPERTY HAS BEEN CONTAMINATED WITH DRY-CLEANING SOLVENT. A NOTICE OF DRY-CLEANING SOLVENT REMEDIATION IS RECORDED IN THE ROCKINGHAM COUNTY REGISTER OF DEED'S OFFICE AT BOOK _____, PAGE _____. QUESTIONS CONCERNING THIS MATTER MAY BE DIRECTED TO THE NORTH CAROLINA DIVISION OF WASTE MANAGEMENT, SUPERFUND SECTION, DRY-CLEANING SOLVENT CLEANUP ACT (DSCA) PROGRAM, OR ITS SUCCESSOR IN FUNCTION. 1646 MAIL SERVICE CENTER, RALEIGH, NC 27699-1646."

CONTAMINANT STATEMENT

GROUNDWATER IN WELLS MW-3 AND MW-4 EXCEEDED THE APPLICABLE 2L WATER QUALITY STANDARDS (15A NCAC 2L.0200) FOR ONE OR MORE OF THE FOLLOWING CONTAMINANTS: TETRACHLOROETHYLENE AND TRICHLOROETHYLENE.

SOIL IN BORINGS SB-1, SB-2, SB-3, SB-06, SB-7, SB-8, AND SB-9 EXCEEDED THE ASSOCIATED RESIDENTIAL RISK BASED SCREENING LEVEL (15A NCAC 2S) FOR ONE OR MORE OF THE FOLLOWING CONTAMINANTS: TETRACHLOROETHYLENE AND TRICHLOROETHYLENE.

THE DOCUMENTARY COMPONENT OF THIS NOTICE OF DRY-CLEANING SOLVENT REMEDIATION, WHICH IDENTIFIES CONTROLS OR LIMITATIONS ON THE USE OF THIS PROPERTY, IS RECORDED AT:

DEED BOOK: _____PAGE:_____

SURVEYOR CERTIFICATION

I, THOMAS E. TEABO, PLS, HEREBY CERTIFY THAT THIS PLAT WAS DRAWN UNDER MY SUPERVISION FROM AN ACTUAL SURVEY MADE UNDER MY SUPERVISION, FROM DEED AND MAP REFERENCES AS NOTED ON SAID MAP; THAT THE BOUNDARIES NOT SURVEYED ARE CLEARLY INDICATED AS DRAWN FROM INFORMATION FROM DEED AND MAP REFERENCES AS NOTED ON SAID MAP.

THAT THE RATIO OF PRECISION OR POSITIONAL ACCURACY OF THE SURVEY AS CALCULATED IS 1: 10,000+, THAT THE BOUNDARIES NOT SURVEYED ARE SHOWN AS BROKEN LINES PLOTTED FROM INFORMATION OF RECORD; THAT THIS MAP WAS PREPARED IN ACCORDANCE WITH G.S. 47-30, AS AMENDED.

I HEREBY CERTIFY THAT THIS MAP WAS DRAWN UNDER MY SUPERVISION FROM AN ACTUAL GPS SURVEY MADE UNDER MY SUPERVISION AND THE FOLLOWING INFORMATION WAS USED TO PERFORM THE SURVEY:

(1) CLASS OF SURVEY: "CLASS A"
(2) POSITIONAL ACCURACY: 0.04'
(3) TYPE OF GPS FIELD PROCEDURE: REAL-TIME KINEMATIC NETWORKS-NCVRS
(4) DATES OF SURVEY: 01/6/2021
(5) DATUM/EPOCH: NAD 83 (2011) EPOCH 2010.00
(6) PUBLISHED/FIXED-CONTROL USE: NCVRS
(7) GEOID MODEL: 2012 (CONUS)
(8) COMBINED GRID FACTOR(S): 0.99976891
(9) UNITS: US SURVEY FEET

THAT THE SURVEY IS OF AN EXISTING PARCEL OR PARCELS OF LAND OR ONE OR MORE EXISTING EASEMENTS AND DOES NOT CREATE A NEW STREET OR CHANGE AN EXISTING STREET. WITNESS MY ORIGINAL SIGNATURE, LICENSE NUMBER AND SEAL THIS 18TH DAY OF NOVEMBER A.D., 2021.

PRELIMINARY - NOT FOR RECORDATION, SALES OR CONVEYANCES

_____
SURVEYOR NC L-3920

NORTH CAROLINA PROFESSIONAL SEAL L-3920 LAND SURVEYOR THOMAS E. TEABO

OWNER ACKNOWLEDGEMENT

I ACKNOWLEDGE THAT I HAVE FULL AUTHORITY TO LEGALLY EXECUTE A DEED FOR THIS PROPERTY.

_____ _____
(SIGNATURE) (DATE)

NORTH CAROLINA

_____ COUNTY

I,_____, A NOTARY PUBLIC OF SAID COUNTY AND STATE, DO HEREBY CERTIFY THAT _____DID PERSONALLY APPEAR AND SIGN BEFORE ME THIS THE _____ DAY OF _____, _____.

_____
NOTARY PUBLIC (SIGNATURE) (OFFICIAL SEAL)

MY COMMISSION EXPIRES _____, _____.

DEQ ACKNOWLEDGEMENT

APPROVED FOR THE PURPOSES OF N.C.G.S. 143-215.104M.

_____
JIM BATESON, LG
CHIEF, SUPERFUND SECTION
DIVISION OF WASTE MANAGEMENT

NORTH CAROLINA
WAKE COUNTY

I,_____, A NOTARY PUBLIC OF SAID COUNTY AND STATE, DO HEREBY CERTIFY THAT _____DID PERSONALLY APPEAR AND SIGN BEFORE ME THIS THE _____ DAY OF _____, _____.

_____
NOTARY PUBLIC (SIGNATURE) (OFFICIAL SEAL)

MY COMMISSION EXPIRES _____, _____.

LEGEND

- LINE SURVEYED
- LINE NOT SURVEYED
- AREA A LIMITS
- AREA B LIMITS
- N/F NOW OR FORMERLY
- CMF CONCRETE MONUMENT FOUND
- IPF IRON PIPE FOUND
- PKF PK NAIL FOUND
- DHF DRILL HOLE FOUND
- IRF IRON REBAR FOUND
- IPS IRON PIPE SET
- PKS PK NAIL SET
- MONITORING WELL
- SOIL BORING
- AREA A GROUNDWATER USE CONTROL AREA
- AREA B SURFACE COVER, SOIL DISTURBANCE, AND VAPOR INTRUSION CONTROL AREA

NCBELS: P-1132

SURVEY PLAT-EXHIBIT A TO THE NOTICE OF DRY CLEANING SOLVENT REMEDIATION
SOURCE PROPERTY
PIN: 799415533043
OWNER: ACI FREEWAY CROSSING LLC
COMPLETE CLEANERS, DSCA SITE ID: DC790003
1537 FREEWAY DRIVE

REIDSVILLE TOWNSHIP, ROCKINGHAM COUNTY, NORTH CAROLINA

BOHLER
4130 PARKLAKE AVENUE, SUITE 130
RALEIGH, NC 27612
919.578.9000
www.bohlerengineering.com
UPSTATE NEW YORK ■ BOSTON, MA ■ NEW YORK METRO ■ WARREN, NJ ■ PHILADELPHIA/SOUTHERN NJ ■ LEHIGH VALLEY, PA ■ SOUTHEASTERN PA ■ BALTIMORE, MD ■ SOUTHERN MARYLAND ■ NORTHERN VIRGINIA ■ WASHINGTON, DC ■ CENTRAL VIRGINIA ■ CHARLOTTE, NC ■ RALEIGH, NC

FILE NO.	DATE	FIELD DATE	CREW CHIEF	DRAWN	REVIEWED	APPROVED	SCALE	DWG. NO.
NS201081	11/18/2021	01/06/2021	RJ	RJ	JT/TET	TET	1" = 100'	1 OF 1

EXHIBIT B
PROPERTY LEGAL DESCRIPTION

BEING ALL of Revised Parcel 1 as shown on that plat entitled "Revision of Parcels I, II and III, Trent Subdivision, Plat Book 39, Page 46 for Glenwood Reidsville Company, L.L.C." as recorded in the Office of the Register of Deeds of Rockingham County, North Carolina in Plat Book 56, Page 21.

TOGETHER WITH those easements contained in that certain Declaration of Access Easements recorded in the Office of the Register of Deeds of Rockingham County, North Carolina in Deed Book 1236, Page 805 and in that certain Declaration of Easements recorded in the Office of the Register of Deeds of Rockingham County, North Carolina in Deed Book 1236, Page 817.

Appendix D

Example Annual Certification of Land-Use Restrictions

ROY COOPER
Governor
ELIZABETH S. BISER
Secretary
MICHAEL SCOTT
Director

NORTH CAROLINA
Environmental Quality

<date>

<property owner>
<address>
<city, state, zip>

Subj: Annual Certification of Land-Use Restrictions
Complete Cleaners, 1537 Freeway Drive
Reidsville, Rockingham County, North Carolina
DSCA Site ID DC790003

Dear <property owner>:

On <date>, the Division of Waste Management made a "No Further Action" decision for the above referenced site. As part of that decision, it was determined that land-use restrictions were necessary to ensure protection of human health and the environment. The land-use restrictions for this site are specified in the Notice of Dry-Cleaning Solvent Remediation (Notice) signed by the property owner and the Division of Waste Management.

As owner of at least a portion of the DSCA Site, you are required to comply with Condition 7 of the Notice by submitting to DEQ a notarized Annual Certification of Land-Use Restrictions certifying that the Notice remains recorded at the Rockingham County Register of Deeds' office and that the Land-Use Restrictions are being complied with. Please complete the enclosed Annual Certification of Land-Use Restrictions and return it to me on or before **January 31, 20__** at the following address:

NCDEQ
Division of Waste Management
DSCA/Jay King
1646 Mail Service Center
Raleigh, NC 27699-1646

In accordance with § 143-215.104M(f), any person who fails to comply within the time specified in this letter, shall then be subject to the applicable enforcement procedures. The Notice further states that if a land-use restriction is violated, the owner of the contamination site at the time the land-use restriction is violated, the owner's successors and assigns, and the owner's agents who direct or contract for alteration of the contamination site in violation of a land-use restriction shall be liable for remediation of all contaminants to unrestricted use standards.

If you have any questions concerning these documents or the site, please contact me at (919) 707-8367 or via email at jay.king@ncdenr.gov.

Sincerely,

Jay W. King, Project Manager
DSCA Remediation Unit
Superfund Section
Division of Waste Management

Attachments: Annual Certification of Land-Use Restrictions form

Cc: DSCA Site ID DC790003 File

Annual Certification of Land-Use Restrictions

Site Name: Complete Cleaners

Site Address: 1537 Freeway Drive, Reidsville, Rockingham County

DSCA Site ID: DC790003

ANNUAL CERTIFICATION of LAND-USE RESTRICTIONS

Pursuant to land-use restriction number 7 (the land-use restrictions are included as part of this form for reference) in the Notice of Dry-Cleaning Solvent Remediation (Notice) signed by ACI Freeway Crossing, LLC and recorded in Deed Book _____, Page _____ on _____ at the Rockingham County Register of Deeds Office, ACI Freeway Crossing, LLC hereby certifies, as an owner of at least part of the property that is the subject of the Notice, that the Notice remains recorded at the Rockingham County Register of Deeds office and the land-use restrictions therein are being complied with.

Duly executed this _____ day of _____, 20__.

Signature: _____

Name typed or printed: _____

STATE OF _____
COUNTY OF _____

I, _____, a Notary Public of the county and state aforesaid, certify that _____ personally came before me this day and the foregoing certification was signed by him/her.

WITNESS my hand and official stamp or seal, this _____ day of _____, 20__.

_____
Name typed or printed:
Notary Public

My Commission expires: _____
[Stamp/Seal]

Appendix E

Example Documents Announcing the Public Comment Period

Public Notice

SUMMARY OF NOTICE OF INTENT TO REMEDIATE A DRY-CLEANING SOLVENT FACILITY OR ABANDONED SITE

N.C. Department of Environmental Quality
Division of Waste Management
Dry-Cleaning Solvent Cleanup Act (DSCA) Program

Complete Cleaners
DSCA Site ID DC790003

Pursuant to N.C.G.S. §143-215.104L, on behalf of ACI Freeway Crossing LLC, the North Carolina Department of Environmental Quality's (NCDEQ's) private contractor has prepared a Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site (NOI). The purpose of this Summary of the NOI is to notify the community of the proposed remedy for the contamination site and invite comment on the proposed remedy.

Complete Cleaners conducted dry-cleaning operations using tetrachloroethylene at the Freeway Crossing shopping center at 1537 Freeway Drive, in Reidsville, North Carolina. Dry-cleaning solvent contamination in soil and/or groundwater has been identified at the following parcels:

1537 Freeway Drive, in Reidsville; Parcel No. 799415533043

An investigation of the extent of contamination has been completed. A risk assessment of the contaminated properties concluded that the contamination poses no unacceptable risks. A Risk Management Plan (RMP) has been prepared which proposes using land-use controls to prevent current and future risks at the affected properties.

The elements of the complete NOI are included in the RMP which is available online at http://portal.ncdenr.org/web/wm/DSCA/PublicNotices.

The public comment period begins _____ __, 20__, and ends _____ __, 20__.

Comments must be in writing and submitted to NCDEQ no later than _____ __, 20__. Written requests for a public meeting may be submitted to NCDEQ no later than _____ __, 20__. Requests for additional information should be directed to Jay King at (919) 707-8367.
All comments and requests should be sent to:

Jay King, DSCA Remediation Unit
Division of Waste Management, NCDEQ
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

ROY COOPER
Governor
ELIZABETH S. BISER
Secretary
MICHAEL SCOTT
Director

NORTH CAROLINA
Environmental Quality

<date>

<property owner>
<mailing address>
<city, state, zip>

Subj: Dry-Cleaning Solvent Contamination Associated with Complete Cleaners,
1537 Freeway Drive, Reidsville, Rockingham County, NC
DSCA Site ID DC790003

Dear <property owner>:

You are receiving this letter because your property at <adjacent property address> is adjacent to an area contaminated with dry-cleaning solvents. There are no actions required on your part and your property is not contaminated. This letter is only for notification purposes. The Dry-Cleaning Solvent Clean-up Act (DSCA) Program has completed an assessment of the dry-cleaning solvent contamination associated with the Complete Cleaners at 1537 Freeway Drive, Reidsville, North Carolina. A remedial strategy to address the site contamination has been prepared, and in accordance with our program's statutes, the community has an opportunity to review and comment on the proposed strategy.

The attached Summary of the Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site (NOI) provides a brief description of the proposed remedy, a web link to the complete NOI, and the dates and procedures for commenting on the proposed remedy. If you do not have access to the internet, we ask that you contact us to request a hard copy of the complete NOI.

If you have questions, please contact me at jay.king@ncdenr.gov or (919) 707-8367.

Sincerely,

Jay W. King, DSCA Project Manager
Division of Waste Management, NCDEQ

Attachments: Summary of the NOI
Cc: DSCA Site ID DC790003 File

ROY COOPER
Governor
ELIZABETH S. BISER
Secretary
MICHAEL SCOTT
Director

NORTH CAROLINA
Environmental Quality

<Date>

Ms. Summer Woodard
City Manager
230 W. Morehead Street
Reidsville, NC 27320

Subj: Remediation of Dry-Cleaning Solvent Contamination
DSCA Site ID DC790003
Complete Cleaners, 1537 Freeway Drive, Reidsville

Dear Ms. Woodard,

The Dry-Cleaning Solvent Cleanup Act of 1997 (DSCA), North Carolina General Statutes (N.C.G.S.) Sections 143-215.104A through 143-215.104U, provides for the assessment and remediation of properties that may have been or were contaminated by chlorinated solvents. To satisfy the requirements of N.C.G.S. 143-215.104L, this letter serves as the **Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site** (NOI) approved by the North Carolina Department of Environmental Quality (DEQ).

The NOI must provide, to the extent known, a legal description of the location of the DSCA Site, a map showing the location of the DSCA Site, a description of the contaminants involved and their concentrations in the media of the DSCA Site, a description of the intended future use of the DSCA Site, any proposed investigation and remediation, and a proposed Notice of Dry-Cleaning Solvent Remediation (NDCSR) prepared in accordance with N.C.G.S. Section 143-215.104M. The required components of the NOI are included in the attached Risk Management Plan, and are available during the public comment period on our website at: https://deq.nc.gov/about/divisions/waste-management/superfund-section/special-remediation-branch/dsca-public-notices-announcements

The DSCA Program is providing a copy of the NOI to all local governments having jurisdiction over the DSCA Site. A 30-day public comment period is being held from <date>, until <date>. Written comments may be submitted to DEQ no later than <date>. Written requests for a public meeting may be submitted to DEQ no later than <date>. All such comments and requests should be sent to:

Jay King, DSCA Remediation Unit
Division of Waste Management, NCDEQ
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

A Summary of the NOI is being published in the Greensboro News & Record, copies are being sent to owners of property within and contiguous with the area of contamination, and a copy of the Summary will be conspicuously posted at the Site during the public comment period.

If you have any questions, please feel free to contact me at (919) 707-8367.

Sincerely,

Jay W. King, DSCA Project Manager
Division of Waste Management, NCDEQ

North Carolina Department of Environmental Quality | Division of Waste Management
217 West Jones Street | 1646 Mail Service Center | Raleigh, North Carolina 27699-1646
919.707.8200

ROY COOPER
Governor
ELIZABETH S. BISER
Secretary
MICHAEL SCOTT
Director

NORTH CAROLINA
Environmental Quality

<Date>

Ms. Angel Wyatt
Rockingham County Environmental Health Director
PO Box 204
Wentworth, NC 27375

Subj: Remediation of Dry-Cleaning Solvent Contamination
DSCA Site ID DC790003
Complete Cleaners, 1537 Freeway Drive, Reidsville

Dear Ms. Wyatt:

The Dry-Cleaning Solvent Cleanup Act of 1997 (DSCA), North Carolina General Statutes (N.C.G.S.) Sections 143-215.104A through 143-215.104U, provides for the assessment and remediation of properties that may have been or were contaminated by chlorinated solvents. To satisfy the requirements of N.C.G.S. 143-215.104L, this letter serves as the **Notice of Intent to Remediate a Dry-Cleaning Solvent Facility or Abandoned Site** (NOI) approved by the North Carolina Department of Environmental Quality (DEQ).

The NOI must provide, to the extent known, a legal description of the location of the DSCA Site, a map showing the location of the DSCA Site, a description of the contaminants involved and their concentrations in the media of the DSCA Site, a description of the intended future use of the DSCA Site, any proposed investigation and remediation, and a proposed Notice of Dry-Cleaning Solvent Remediation (NDCSR) prepared in accordance with N.C.G.S. Section 143-215.104M. The required components of the NOI are included in the attached Risk Management Plan, and are available during the public comment period on our website at:
https://deq.nc.gov/about/divisions/waste-management/superfund-section/special-remediation-branch/dsca-public-notices-announcements

The DSCA Program is providing a copy of the NOI to all local governments having jurisdiction over the DSCA Site. A 30-day public comment period is being held from <date>, until <date>. Written comments may be submitted to DEQ no later than <date>. Written requests for a public meeting may be submitted to DEQ no later than <date>. All such comments and requests should be sent to:

Jay King, DSCA Remediation Unit
Division of Waste Management, NCDEQ
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

A Summary of the NOI is being published in the Greensboro News & Record, copies are being sent to owners of property within and contiguous with the area of contamination, and a copy of the Summary will be conspicuously posted at the Site during the public comment period.

If you have any questions, please feel free to contact me at (919) 707-8367.

Sincerely,

Jay W. King, DSCA Project Manager
Division of Waste Management, NCDEQ

North Carolina Department of Environmental Quality | Division of Waste Management
217 West Jones Street | 1646 Mail Service Center | Raleigh, North Carolina 27699-1646
919.707.8200