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January 23, 2013

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Ms. Lisa Taber
Brownfields Project Manager
North Carolina Department of Environment and Natural Resources
Division of Waste Management
Brownfields Program
Mail Service Center 1646
Raleigh, North Carolina 27699-1646



RE: NATIONAL TEXTILES, LLC
Brownfields Project Number 04004-00-12
100 Reep Drive
Morganton, Burke County

Dear Lisa:

This responds to your December 12, 2012 e-mail to me and the December 20, 2012 letter you received from Don Nielsen. In Don's letter, there was finally an admission, despite previous repeated denials, that for at least 6 years Ferguson Copeland purchased and used products containing PCE and TCE. Ferguson Copeland's last purchase occurred in January 2012. It is admitted that these products were used to clean "fabric that may have gotten soiled during production." Such usage is clearly within the manufacturing process at the plant. The PCE and TCE usage by Ferguson Copeland was very important information for a variety of reasons and it is disappointing it was not more forthcoming.

I doubt anyone will ever be 100 percent certain where in the facility the PCE and TCE were used by Ferguson Copeland. Further, it is equally uncertain that the vapors from the use of those products could not have migrated throughout the entire facility. We are also informed that in addition to the now admitted chlorinated solvent uses, Ferguson Copeland has used paint spray booths at its facility for stripping paints/finishes from wood furniture, a common use for chlorinated solvents. The fact that Ferguson Copeland now admits using PCE and TCE containing products during the past 6 years makes it very likely that the 2007 indoor air sampling conducted by my client at the facility was impacted by such usage.

In your December 12, 2012 e-mail, you mention that "the concentrations need only be reduced by one to two orders of magnitude to bring chlorinated solvent concentrations inside the

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building to acceptable industrial levels.” If, as claimed, the PCE and TCE products are in fact no longer used at the facility, I agree with you that it is important to perform another round of indoor air testing at the site. It could be that the removal of those chlorinated products will reduce the order of magnitude to acceptable industrial levels and thereby obviate the need for further vapor intrusion work at this facility. We would be willing to submit to you a work plan for this testing. However, building-specific factors and related issues including indoor air occupational “background” level chemical concentrations arising from furniture off-gassing as well as past or present storage and use of chlorinated solvents and other chemicals should be properly addressed in this testing. I’m sure you recall the reactions of your eyes and throat at the time of your April 2012 site visit.

I would also be glad to meet in the near future with you and Bruce to further discuss these issues. However, would it be more beneficial to submit a work plan for indoor air testing before we meet?

Please call me if you have any questions.

Sincerely,



Stephen R. Berlin

Enclosures

cc: Donald M. Nielsen
Bruce Nicholson
Tommy Thompson