



**Bell, Davis & Pitt**

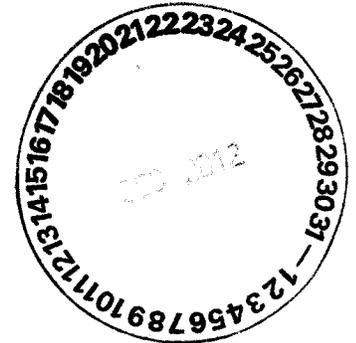
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December 20, 2012



Ms. Lisa Taber, PG  
Project Manager  
NC Brownfields Program  
1646 Mail Service Ctr., Room 3409-M  
Raleigh, NC 27699-1646

Re: National Textiles/Morganton  
Brownfields ID # 04004-00-12  
PCE Usage at Ferguson Copeland

Dear Lisa:

I am writing on behalf of Reep Drive, LLC("Reep Drive"), the owner of the above-referenced property (the "Property"), in response to your request for a more detailed explanation regarding PCE use at the Property. As you know, the Property contains a former National Textiles facility. National Textiles leased the Property to Ferguson Copeland until about 2007 and Ferguson Copeland now leases the Property from Reep Drive.

Under the Brownfields Agreement ("BFA") certain listed chemicals, including PCE, may be used or stored at the Property without the prior approval of DENR, "in *de minimis* amounts for cleaning and other routine housekeeping activities." As outlined in more detail below, we have learned that there had been *de minimis* use of certain BFA-listed products upstairs at Reep Drive; we note that the National Textiles air testing in 2008 was downstairs. All such use has been eliminated, and to our knowledge no PCE, TCE or chemicals listed in the BFA have been used at the Property for some time

Based on conversations with Ferguson Copeland managers and reviews of invoices of products purchased, two fabric-cleaning products (Sprayaway 830 Spot Lifter and Sprayaway C-60 Solvent Cleaner), which can be purchased by the public at Walmart and similar outlets, were utilized by Ferguson Copeland in the upstairs upholstery department in order to occasionally spot clean that limited amount of fabric that may have gotten soiled during production. 830 Spot Lifter contains PCE. C-60 Solvent Cleaner contains TCE. Usage was intermittent by spraying at close range on small quantities of fabric. We understand that each upholstery station maintained a can and that supervisors and quality control personnel had a can. Full cans were occasionally removed from the factory, as, for example, cans were occasionally sent to the Ferguson

Copeland showroom in High Point to clean upholstery that may have gotten soiled in transit from the factory to the showroom.

Invoices reflect that the C-60 was purchased in 16-ounce cans and the 830 in 17.3-ounce cans. The last purchase of these products was made in January 2012. Any remaining cans on hand were disposed of. Based on discussions with Ferguson Copeland managers, the average number of cans used by the upholstery department annually during the last 6 years was about 12 cans (or about 6 cans each of C-60 and 830). The use of such products for spot cleaning purposes is clearly *de minimis*. Regardless, such products are no longer used.

Please let me know if you have any questions. My client looks forward to National Textiles and DENR taking the next steps to resolve the BFA's outstanding issues.

Sincerely,

BELL, DAVIS & PITT, P.A.

A handwritten signature in cursive script, appearing to read "Donald M. Nielsen".

Donald M. Nielsen

cc: Mr. Stephen R. Berlin

#582230