



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

December 18, 2013

Sent Via E-mail and USPS

Lonnie English, Mayor
Town of Robbins
101 North Middleton Street
Robbins, NC 27325
lenglish@mountaire.com

Subject: Letter of Eligibility
Former Robbins Mill Site
200 S. Kennedy Street
Robbins, Moore County, NC 28092
Brownfields Project Number: 17054-13-063

Dear Mayor English:

The North Carolina Department of Environment and Natural Resources (DENR) has received and reviewed the Brownfields Property Application (BPA) dated November 5, 2013. This application was submitted on behalf of the Town of Robbins as a Prospective Developer seeking a brownfields agreement regarding the subject site. Upon review of the BFA and additional information with respect to the requirements of the Brownfields Property Reuse Act of 1997, DENR has determined that this project is eligible for entry into the North Carolina Brownfields Program and for continued evaluation for a Brownfields Agreement.

We understand that the property was formerly a woolen weaving textile mill used principally for yarn processing, spinning and fabric production, and that a fire at the site in August 2008 destroyed the mill; only the smokestack and debris and rubble piles remain at the site. We also understand that the Town of Robbins has received assessment grant funding to address this site through the EPA Brownfields Grant process.

The next step in the process will involve a detailed review of available environmental and other relevant data to determine what is currently known about contamination at the site, and what, if any, information gaps may exist that may require additional assessment. We are in receipt of the following documents submitted with your BPA:

Title	Author	Date
Town of Robbins Brownfield Assessment Project Property Owner Memorandum of Understanding	Cardno, Inc.	July 2013

1646 Mail Service Center, Raleigh, North Carolina 27699-1646
Phone: 919-707-8200 \ Internet: <http://portal.ncdenr.org/web/wm>

An Equal Opportunity \ Affirmative Action Employer - 50% Recycled \ 10% Post Consumer Paper

Title	Author	Date
Phase I Environmental Site Assessment	Cardno, Inc.	September 27, 2013
Generic Quality Assurance Project Plan (QAPP), Revision 0, Town of Robbins	Cardno, Inc.	October 18, 2013
EPA R4 Brownfields Grant Site Eligibility Determination Outline, Phase II	Cardno, Inc.	November 5, 2013

Historical site information from the files of DENR's Division of Waste Management will also be utilized during the evaluation process. Please forward any additional relevant information or data you may have, including reports from other DENR agencies or regional offices to assist in our review. We will contact you regarding any additional assessment that may be necessary to establish that the property is or can be made suitable for the intended reuse, as required by statute.

According to the BPA, the intended redevelopment for the site is not yet fully conceptualized, but will likely be a mixed use project to potentially include a combination of light or heavy industrial, commercial retail, educational purposes, recreational and open space uses. Because risk management decisions may vary depending on the nature of the redevelopment, it will be important that DENR review the locations of the various elements of your planned redevelopment as they become available. Please forward any maps or drawings indicating these details, even if they are only preliminary or conceptual.

Pending execution of a Brownfields Agreement, eligibility is provisional. You do not have the protections such an agreement offers unless and until it is executed. Thus, you operate at the site pending conclusion of a Brownfields Agreement at the risk of jeopardizing your eligibility and/or becoming a party responsible for the contamination at the site if an agreement is not finalized. This makes it very much in your interest to consult closely with the Project Manager regarding any planned site activities prior to agreement finalization.

If a party other than the Prospective Developer will own the Brownfields property at the conclusion of the brownfields process, the final document (which gets recorded at the Register of Deeds' office) must be signed not only by the Prospective Developer but by that owner. Failure by the Prospective Developer to ensure, by the time Brownfields Agreement negotiations are complete, the willingness to sign of any such party, and to provide DENR the exact name, e-mail address, telephone number and U.S. mail address of the party (along with signatory/signatory's title in the case of an entity) will retard, and could prevent, the Brownfields Agreement taking effect.

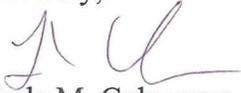
If the Prospective Developer does not actually buy the property for redevelopment, it loses its eligibility for the Brownfields Program. That means the Prospective Developer itself, not an affiliate or any other party.

DENR is pleased about the potential for public benefit offered by the reuse of the former Robbins Mills property, and looks forward to working with you to advance this brownfields

Robbins Mill Site
December 18, 2013

redevelopment project. If you have questions about this correspondence or require additional information, please feel free to contact your Project Manager by phone at 919.707.8379 or by email at sharon.eckard@ncdenr.gov.

Sincerely,



Linda M. Culpepper
Deputy Director
Division of Waste Management

cc: Project File
ec: Bruce Nicholson, DENR
Sharon Eckard, DENR

