

Via FedEx Standard Overnight

June 23, 2016

NC Department of Environmental Quality  
Division of Waste Management  
Brownfields Program  
1646 Mail Service Center  
Raleigh, NC 27699-1646

Attn: Ms. Shirley Liggins

Re: Brownfields Property Application  
Rite Aid Site  
(Former Charlotte Army Missile Plant)  
1776 Statesville Avenue  
Charlotte, North Carolina  
H&H Project No. ATL-001



Dear Ms. Liggins:

On behalf of ATCO, enclosed please find the Brownfields Property Application package for the above referenced site located in Charlotte, NC. The original signed and notarized hard copy of the application is being submitted via FedEx.

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

*Hart & Hickman, PC*

A handwritten signature in black ink, appearing to read "Matt Ingalls".

Matt Ingalls  
Project Manager

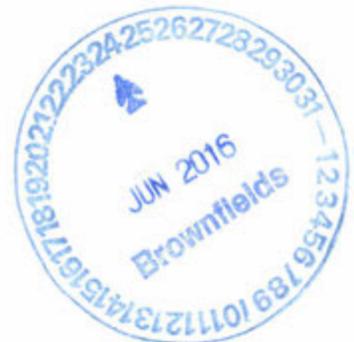
cc: Mr. Neil Adamson – ATCO  
Ms. Carolyn Minnich – DEQ Brownfields

Enclosures

# Brownfields Property Application

Rite Aid Site  
(Former Charlotte Army Missile Plant)  
1776 Statesville Avenue  
Charlotte, North Carolina

H&H Job No. ATL-001  
June 23, 2016



hart  hickman

SMARTER ENVIRONMENTAL SOLUTIONS

**Brownfields Property Application**  
North Carolina Brownfields Program  
[www.ncbrownfields.org](http://www.ncbrownfields.org)

**I. PROSPECTIVE DEVELOPER (PD) INFORMATION {USE TAB KEY TO GET TO NEXT DATA ENTRY LINE – DO NOT USE THE RETURN KEY}**

**A. PD information:**

Entity name	ATCO Investments LLC (ATCO) c/o Neil Adamson
Principal Officer	Neil Adamson - Sr Vice President - Finance and Acquisitions
Representative	Neil@atco555.com
Mailing Address	555 Fifth Avenue - 16th Floor New York, NY 10017
E-mail address	Neil@atco555.com
Phone No.	718.326.3560 x 233
Fax No.	718.326.0374
Web site	<a href="http://www.atco555.com/companies-atco-investment-management.php">http://www.atco555.com/companies-atco-investment-management.php</a>

**B. PD contact person information (i.e., individual who will serve as the NCBP's point of contact if different than above):**

Name	Matt Ingalls
Company	Hart & Hickman, PC
Mailing Address	2923 S. Tryon Street #100 Charlotte, NC 28203
E-Mail Address	mingalls@harthickman.com
Phone No.	704.887.4617
Fax No.	704.586.0373

**C. Information regarding all parent companies, subsidiaries or other affiliates of PD (attach separate sheet(s) if necessary):**

**(Use for LLCs)**

Member-managed or manager-managed? **Answer:** Manager-Managed

If manager-managed, provide name of manager and percent of ownership:

Name ATCO Properties & Management, LLC  
Ownership (%) 100%  
Mailing Address 555 Fifth Avenue - 16th Floor  
New York, NY 10017  
E-Mail Address Neil@atco555.com  
Phone No. 718.326.3560 x233  
Fax No. 718.326.0374

For all LLCs, list all members of the LLC and provide their percent of ownership:

Name ATCO Properties & Management, LLC  
Ownership (%) 100%  
Mailing Address 555 Fifth Avenue - 16th Floor  
New York, NY 10017  
E-Mail Address Neil@atco555.com  
Phone No. 718.326.3560 x233  
Fax No. 718.326.0374

Name  
Ownership (%)  
Mailing Address

E-Mail Address  
Phone No.  
Fax No.

Name  
Ownership (%)  
Mailing Address

E-Mail Address  
Phone No.  
Fax No.

Managers of manager-managed LLCs are required to execute all brownfield documents for the LLC; as to member-managed LLCs, state name of member who will sign these documents.

ATCO Properties & Management LLC  
by: Neil Adamson  
Authorized Signatory

List all parent companies, subsidiaries and other affiliates:

**(Use for Partnerships)**

Check one:  General Partnership  Limited Partnership

List all partners and percent of ownership:

Name

Ownership (%)

Mailing Address

E-Mail Address

Phone No.

Fax No.

Is this person a general or limited partner?

Name

Ownership (%)

Mailing Address

E-Mail Address

Phone No.

Fax No.

Is this person a general or limited partner?

List all parent companies, subsidiaries and other affiliates:

**(Use for corporations other than LLCs)**

*(If information is the same as shown in 1.A., please indicate "same as 1.A." below.)*

Name

Mailing Address

E-Mail Address

Phone No.

Fax No.

List all parent companies, subsidiaries and other affiliates:

**(Use for individuals)**

*(If individual is the same as shown in 1.A., -please indicate "same as 1.A." above.)*

Name

Mailing Address

E-Mail Address

Phone No.

Fax No.

- D. Does PD have or can it obtain the financial means to fully implement a brownfields agreement and assure the safe reuse of the property? *(Attach supporting documentation such as letters of credit, financial statements, etc.)*

Answer      Yes

Explanation    ATCO, a Manhattan-based real estate investment and ownership firm is under contract to purchase the subject site. Vision Real Estate Advisors/Vision Construction Services of the Carolinas (Vision), a local real estate and development firm, is acting as a local advisor during of due diligence during acquisition of the property.

ATCO is deploying capital in select cities across the United States, with a particular emphasis on value-add opportunities. ATCO is currently deploying capital through a joint venture program with family offices and other private capital, focused on urban office and

retail properties. Target markets include the Central Business Districts of Austin, Nashville, Charlotte, and Raleigh-Durham-Chapel Hill, and the metro New York area. For over eight decades, ATCO has owned, managed, and developed a diverse real estate portfolio, primarily in and around New York City, and provided a range of services to other real estate owners. The company is in its fourth generation of family ownership, and ATCO presently owns and manages more than 20 buildings ranging from high-rise office and residential towers to retail properties, from one-story industrial structures to high tech flex buildings. The portfolio of New York City properties includes: 555 Fifth Avenue, 40 Central Park South, 41 West 58th Street, 630 Third Avenue, 381 and 373 Park Avenue South, 515 Madison Avenue and the Atlas Terminals. Nationally, the company owns properties in Austin, Texas; Chapel Hill, North Carolina; Indianapolis, Indiana; Darien, Stamford and Westport, Connecticut; Baltimore, Maryland; and Orlando, Florida. Internationally, ATCO has investments in seven European countries.

- E. Does PD have or can it obtain the managerial means to fully implement a brownfields agreement and assure the safe use of the property?

Answer Yes

Explanation ATCO and Vision collectively have strong backgrounds in managing and financing real estate development and construction projects. In addition, ATCO has retained the services of Hart & Hickman, PC (H&H) who is experienced in Brownfields redevelopment and implementation of Brownfields requirements. Collectively, ATCO, Vision, and H&H have significant experience with redevelopment of challenged properties, and we are aware of the requirements and restrictions that are typically included in the Brownfields Agreement to ensure successful implementation of a Brownfields Agreement and safe use of the property.

- F. Does PD have or can it obtain the technical means to fully implement a brownfields agreement and assure the safe use of the property?

Answer Yes

Explanation ATCO and Vision have a wide range of engineering and environmental experience available to it. ATCO has also retained H&H (a NC Licensed Environmental Engineering Firm) who has extensive experience in environmental matters in Brownfields assessment and implementation of Brownfields agreements.

G. Does PD commit that it will comply (and has complied, if PD has had a prior project in the NCBP) with all applicable procedural requirements of the NCBP, including prompt payment of all statutorily required fees?

Answer Yes

*(List all NCBP project name(s) and NCBP project ID numbers where PD or any parent company, subsidiary and other affiliate of PD has been a party to.)*

H. Does PD currently own the property?

Answer No. The property is currently owned by the following two entities:

- 1) Parcel # 07903105 is owned by Eckerd of North Carolina, Inc.
- 2) Parcel # 07903102 is owned by Bancroft Realty Company

*If yes, when did PD purchase the property and from whom? (Provide name, address, telephone number and email address of the contact person for the current property owner.)*

If no, provide the name, address, telephone number and e-mail address of the contact person for the current property owner

Joseph Notarianni, Jr. (VP Real Estate Law - Rite Aid Corporation) represents the property owners (Eckerd of North Carolina, Inc. and Bancroft Realty)

Contact Info:  
Rite Aid Corporation  
Attn: Joseph Notarianni, Jr.  
30 Hunter Lane  
Camp Hill, PA 17011  
phone # (717) 972-3998  
email: jnotarianni@riteaid.com

I. If PD does not currently own the property, does PD have the property under contract to purchase?

Answer Yes

If yes, provide date of contract. March 17, 2016

If no, when does the PD intend to purchase the property (e.g., after the project is determined to be eligible for participation in the NCBP, after PD receives a draft BFA, after the conclusion of the brownfields process)?

- J. Describe all activities that have taken place on the property since PD or PD's parents, subsidiaries and/or other affiliates, and/or lessees or sublessees of PD, took ownership of or operated at the property (e.g., industrial, manufacturing or commercial activities, etc.). *(Include a list of all regulated substances as defined at NCGS § 130A-310.31(b)(11) that have been used, stored on, or otherwise present at the property while those activities were conducted, and explain how they were used.)*

ATCO has directed H&H to conduct certain environmental due diligence activities including conducting Phase I and II ESA activities on the property. GTA Associates was also recently contracted by ATCO to conduct geotechnical activities on the property.

## II. SITE INFORMATION

### A. Information regarding the proposed brownfields property:

Proposed project name	Rite Aid Site (Former Charlotte Army Missile Plant)		
acreage	37	County	Mecklenburg
street address(es)	1776 Statesville Avenue		
city	Charlotte	zip	28206
tax ID(s) or PIN(s)	Parcel #s 07903102 and 07903105		

past use(s) The site was developed for industrial use in 1924 and was initially used for the manufacture of Model T Fords until approximately the 1930s. The Rite Aid property, the Hercules Industrial property to the north (currently a Brownfields site), and the MV Tryon property to the east were used by the United States Government as a storage depot from the early-1940s to the mid-1950s and then for the production of Hercules missiles from the mid-1950s to the late-1960s. The missile production facility was known as the Charlotte Army Missile Plant (CAMP). The CAMP facility included six buildings (Buildings 1, 2, 3, 48, 50, and the Boiler House) located on the Rite Aid property. Activities conducted at the missile facility included metal working, plating, degreasing, painting, assembly, wastewater treatment, assembly, and shipping of missiles. On the Rite Aid property, Building 1 was utilized for die casting, metal plating, and cleaning. Building 2 was utilized as a machine shop and process plant. Building 3 was utilized for storage and offices. Building 48 housed emergency response vehicles and was utilized for automotive maintenance activities. Building 50 housed chemical storage and solvent receiving and distribution.

current use(s) Since the late 1960s, the Rite Aid property has been used by Eckerd/Rite Aid for warehousing and distribution of commercial/retail items. Rite Aid is currently in the process of vacating the site.

cause(s)/source(s) of contamination:

known H&H is currently conducting Phase I and II ESA activities at the Rite Aid (former CAMP) site and has (to date) identified the following Recognized Environmental Conditions (RECs), suspected RECs, and Historical REC (HREC) associated with the property. Note, the summary below references Eckerd Building # designations and not those used by the US Army Corps of Engineers (COE).

- REC #1 Chlorinated Solvent Impacts in Groundwater – The COE has conducted extensive soil and groundwater assessment activities at the site as part of Formerly Used Defense Sites (FUDS) Program. Based on assessment activities conducted to date, the COE has determined that groundwater contamination from the chlorinated solvent trichloroethene (TCE) and its degradation products originated from historical governmental operations conducted at the site. The primary source area for groundwater impacts has been determined to originate near the eastern end of Building 2 where electroplating and degreasing operations were conducted. In the most recent sampling event conducted by the COE in 2012, TCE was detected in groundwater at concentrations as high as 14,000 µg/l from a sample collected in a monitoring well located on the east side of Building 2. Groundwater flow from the Rite Aid site is to the north-northwest and toward the adjacent Hercules Industrial Park property (currently a Brownfields site). There are also sources of groundwater impacts on the adjacent Hercules property including a former process pit in CAMP Building 2 and a former wastewater treatment plant east of CAMP Building 2.

The results of the COE investigations indicate no complete exposure pathways for surface or subsurface soil at the CAMP site (a complete exposure pathway is one in which there is a reasonable potential that human or environmental receptors could be exposed to compounds at levels of concern). As such, the COE determined that no soil remediation is warranted at the CAMP site. However, please note that no soil samples have been collected by the COE from below the Rite Aid buildings for analysis. Therefore, it is possible that soil impacts are present below the site buildings that have not been assessed. The COE also evaluated potential vapor intrusion into buildings from underlying impacted ground water. The results of the COE evaluation indicated that vapor intrusion was not a concern for current use of the site buildings for commercial/industrial purposes. No complete exposure pathways were identified for impacted ground water; however, ground water impacts do exceed North Carolina groundwater standards. Thus, the COE evaluated groundwater remediation alternatives in a Feasibility Study (FS) prepared in 2004. As a result of the FS, the COE initially chose to actively remediate groundwater at the CAMP site using a technique called in-situ chemical oxidation. In this process, chemical oxidants are injected into the ground which chemically destroy the compounds to harmless by-products.

In 2005 and 2006, the COE conducted a pilot test of the planned chemical oxidation to determine the effectiveness of the remediation technique and to select design parameters for full scale implementation. The results of the pilot test indicated that the chemical oxidation was generally successful and effective in reducing compound concentrations in groundwater. The COE recently performed a revised evaluation of remedial alternatives and indicated that they planned to modify the remedial alternative for the groundwater impacts to monitored natural attenuation. The COE is in the process of addressing DEQ and Stakeholder comments associated with the revised remedial approach.

H&H is currently conducting Phase I and II ESA activities at the site on behalf of ATCO and has identified the TCE impacts in groundwater above NC 2L groundwater standards to be a REC.

- REC #2 Former Electroplating and Degreasing Pits in Buildings 1 and 2 – Historical plating and degreasing activities have occurred in Buildings 1 and 2. During a 2005 sampling event, Hoffman Engineering Inc. (Hoffman) collected shallow soil samples below the concrete floor in the western portion of Building 1 and detected hexavalent chromium (7,949 mg/kg) and total chromium (80,000 mg/kg) at concentrations above the DEQ IHSB industrial preliminary soil remediation goals (PSRGs). TCLP Cr results (780 mg/L) above the EPA Maximum Concentration of Contaminants for Toxicity Characteristics of 5 mg/L. H&H is currently conducting Phase I and II ESA activities at the site on behalf of ATCO and has identified the soil impacts of chromium associated with the former electroplating and degreasing pits to be a REC.
- REC #3 Soil Impacts (West of Building 1) – On March 24, 2016, H&H advanced a soil boring (SB-8) west of the former electroplating pit in Building 1 and in a grassy area outside of the building. The soil boring was advanced to an approximate depth of 10 ft below the ground surface (bgs) where field screening detected elevated Photo-Ionization Detector (PID) readings of 367 ppm and evidence of petroleum staining. Analytical results reported SVOC impacts at concentrations above IHSB residential and Protection of Groundwater (POG) Preliminary Soil Remediation Goals (PSRGs) in a soil sample submitted for laboratory analysis. The source of the petroleum-impacted soil at this location is unknown. H&H is currently conducting Phase I and II ESA activities at the site on behalf of ATCO and has identified petroleum-impacted soil discovered west of Building 1 at concentrations above residential and POG PSRGs to be a REC.
- REC #4 Automotive Service Area – During recent Phase I ESA activities, H&H identified a former in-ground hydraulic lift and oil-changing pit located in Building 48 that were depicted on an original construction drawing provided by Rite Aid. The in-ground lift and the oil-changing pit are abandoned. H&H is currently conducting Phase I and II ESA activities at the site on behalf of ATCO and has identified the potential for a release associated with the former in-ground hydraulic lift and the oil-changing pit located in Building 48 to be a potential REC.
- REC #5 Former UST Basin West of Building 48– During recent Phase I ESA activities, H&H discovered eight abandoned underground storage tanks (UST) utilizing ground penetrating radar (GPR) survey techniques within a tank basin located west of Building 48. Fill ports/vent pipes are not visible on the ground surface above the USTs. The USTs are thought to have previously contained fuel oil utilized in a nearby former boiler room. H&H is currently conducting Phase I and II ESA activities at the site on behalf of ATCO and has identified suspected petroleum-impacted soil during recent field screening activities. Therefore, H&H considers suspected impacts associated with the eight abandoned USTs identified adjacent to Building 48 to be a REC.
- REC #6 Wood Block Flooring– The floor of Building 2 was constructed with creosote treated wood blocks above a concrete slab to presumably minimize static build-up during missile manufacturing operations. The wooden blocks are approximately 2-inches thick and cover a majority of the Building 2 manufacturing area. Given the known manufacturing, electroplating, and degreasing operations that occurred within the manufacturing area, it is likely that historical releases of chemicals containing heavy metals and chlorinated solvents has occurred to the wooden floor. H&H is currently conducting Phase I and II ESA activities at the site on behalf of ATCO and has identified the creosote treated wood floor to be a potential REC.

H&H identified the following historical recognized environmental concerns (HRECs) in connection with the site which, based upon our evaluation, we do not consider to be RECs:

- HREC #1 Former USTs– 17 former petroleum USTs associated with Buildings 1, 2, 3, 48, 50, and the boiler house (not including USTs noted in REC #3) were previously removed from the site in 1990, 1998, and 2004. There are two separate release incidents associated with the USTs. Incident No. 7617 was reported in 1990 and is associated with 12 USTs that contained heating oil, gasoline, or diesel fuel. Further assessment of the USTs occurred in 2005 and the release incident was closed by DEQ in April 2011. Incident No. 20520 is associated with a former heating oil UST release that was reported in 1998. The release incident was closed by DEQ in September 1999. Soil and groundwater impacts were identified above NC DEQ Action Levels and NC 2L Standards but were determined not to pose an unacceptable or potentially unacceptable risk to human health or the environment. NC DEQ issued a Notice of No Further Action (NFA) for the releases in April 2011 and September 1999. Four additional USTs that contained gasoline and diesel fuel were removed by the COE in 1990. Soil impacts were identified and COE addressed petroleum impacted soil associated with these USTs under the FUDS Program. Based on the regulatory closures and management of USTs under the FUDS program, H&H has identified the former USTs and associated residual petroleum impacts as an HREC.

suspected

- B. Regulatory Agency Involvement: List the site names and all identifying numbers (ID No.) previously or currently assigned by any federal, state or local environmental regulatory agencies for the property. The ID No's may include [CERCLIS numbers](#), RCRA generator numbers for past and present operations, [UST database](#), [Division of Water Quality's incident management database](#), and/or [Inactive Hazardous Sites Branch inventory numbers](#). *(In many instances, the PD will need to actively seek out this information by reading environmental site assessment reports, reviewing government files, contacting government officials, and through the use of government databases, many of which may be available over the internet.)*

Agency Name/ID No: US Brownfields - City of Charlotte Assessment Grant; Agreement #95462010/Property ID #135084; Newcamp Former CAMP

Agency Name/ID No: DEQ LUST - Recovered Government Archives - Facility ID #s 0-013231, 20520, and 7617; Eckerd Charlotte Distribution

Agency Name/ID No: EPA RCRA SQG EPA ID #NCD986177608; Rite Aid Distribution

Agency Name/ID No: EPA FINDS #s 110054366155 and 110004041377

Agency Name/ID No: EPA FUDS Site #104NC04585

Agency Name/ID No:

- C. In what way(s) is the property is abandoned, idled, or underused?

Rite Aid is currently vacating the facility and the property will thus be under utilized. The site is located within an economically challenged area north of uptown Charlotte, NC. A tenant and/or property owner will provide a significant public benefit to the surrounding community.

- D. In what way(s) is the actual or possible contamination at the property a hindrance to development or redevelopment of the property (attach any supporting documentation such as letters from lending institutions)?

The presence of soil and groundwater contamination identified during previous assessment activities conducted on the property is a hindrance to future development. ATCO and subsequent potential tenants or buyers would be unlikely to invest in the redevelopment of the property without a Brownfields Agreement because of the potential liability issues and challenges as the result of the contamination. ATCO is currently under contract to purchase the property and intends to offer it for reuse and potential redevelopment. However, before doing so, it needs to ensure that the property will be accepted into the Brownfields Program and that future owners and occupants will have the protections and benefits afforded by a Brownfields Agreement.

- E. In what way(s) is the redevelopment of the property difficult or impossible without a brownfields agreement (attach any supporting documentation such as letters from lending institutions)?

ATCO believes that a Brownfields Agreement will be essential for the viable and safe reuse of the property. ATCO's development strategy includes obtaining a Brownfields Agreement as a component of purchase and it is unlikely that the property would be purchased and then redeveloped without a Brownfields agreement.

- F. What are the planned use(s) of the redeveloped brownfields property to which the PD will commit? Be as specific as possible.

The site is zoned for industrial use and is located near the intersection of Statesville Road and N. Graham Street and adjacent to a rail station on the proposed Charlotte Area Transit System (CATS) Red Line rail line. Future use will consist of mixed-use, transit-oriented development.

- G. Current tax value of brownfields property: \$10,533,700 (Parcels 07903102 and 07903102)

- H. Estimated capital investment in redevelopment project: \$Unknown at this time

- I. List and describe the public benefits that will result from the property's redevelopment. Be as specific as possible. (Examples of public benefits for brownfields projects include job creation, tax base increases, revitalization of blighted areas, preserved green space, preserved historic places, improving disadvantaged neighborhood quality-of-life related retail shopping opportunities, affordable housing, environmental cleanup activities or set asides that have community or environmental benefits. In gauging public benefit, NCBP places great value upon letters of support from community groups and local government that describe anticipated improvements in quality of life for neighboring communities that the project will bring about. The inclusion of such support letters with this application is recommended and encouraged.)

The site is zoned for industrial use and is located near the intersection of Statesville Road and N. Graham Street. The site is also located adjacent to a rail station on the proposed

Charlotte Area Transit System (CATS) Red Line rail line. The redevelopment of the property in this area will likely:

- 1) maintain and increase the tax base, including both an increase in property tax and taxes associated with additional commercial tenants and increased economic activity;
- 2) create numerous construction jobs and permanent jobs associated with management, leasing, and retail uses;
- 3) provide positive social impact to the surrounding businesses and recreational communities;
- 4) provide positive economic impact to the surrounding community and businesses;
- 5) potentially spur additional development in the area resulting in a larger local tax base; and
- 6) invest in "Smart Growth" through use of land in an already developed urban area which avoids development outside the City limits and increases potential commuters utilizing public transportation including the proposed CATS Red Line rail line.

Special Note: Please describe all environment-friendly technologies and designs PD plans to utilize in its redevelopment strategy. For example, environment friendly redevelopment plans could include: Leadership in Energy and Environmental Design (LEED) Certification, green building materials; green landscaping techniques such as using drought resistant plants; energy efficient designs, materials, appliances, machinery, etc.; renewable sources of energy, and/or recycling/reuse of old building materials such as brick or wood.

ATCO intends to consider a variety of environmentally friendly development techniques and project enhancements as part of their development effort. As the plans for development are preliminary, no firm decisions have been made at this time.

J. Who will own the brownfields property when the Notice of Brownfields Property is filed with the register of deeds at the conclusion of the brownfields process? (If information is the same as 1.A. above, please indicate.)

Name ATCO anticipates that either it, or a to-be-formed, wholly-owned single-purpose entity will own the property at the conclusion of the Brownfields process, but it has not made a final decision at this time.

Mailing Address

E-Mail Address

Phone No.

Fax No.

**III. OTHER REQUIRED INFORMATION**

- A. Brownfields Affidavit: PD must provide its certification, in the form of a signed and notarized original of the unmodified model brownfields affidavit provided by NCBP, that it did not cause or contribute to contamination at the property and that it meets all other statutory eligibility requirements. (Note: The form to use for this affidavit is attached to this

application. An original hard copy of this affidavit must be filled out, signed, notarized and submitted with this application.)

Is the required affidavit, as described above, included with this application?

Answer Yes, please see Appendix A.

B. Proposed Brownfields Agreement Form: PD must provide the completed form Proposed Brownfields Agreement. (Note: The form to use for this document is attached to this application. It must be filled out, initialed, and attached on your submittal.)

Is the required Proposed Brownfields Agreement, as described above, included with this application?

Answer Yes, please see Appendix B.

C. Location Map: PD must provide a copy of the relevant portion of the 1:24,000 scale U.S.G.S. topographic quadrangle map that shows the location of the property, clearly plotted, and that measures at least an 8 ½ by 11 inches. (Note: these maps can be purchased through the above link, or often through retail outdoor recreation stores that can print out the relevant map. Often environmental reports have location maps that use this type of map format as the base for its location map.)

Is the required location map included with this application?

Answer Yes, please see Appendix C.

D. Survey Plat: PD must provide a preliminary survey plat of the brownfields property with the property boundaries clearly identified, and a metes and bounds legal description that matches the property description on the plat. At this stage of the brownfields process, one or more existing survey plats from a previous property conveyance will suffice. (Before the brownfields project enters the public comment phase of the brownfields process, the PD will be required to submit a final brownfields survey plat which includes the information listed in the brownfields survey plat guidance.)

Is the required preliminary survey plat included with this application?

Answer Yes, please see Survey Plat and Property Deed Legal Description in Exhibit D.

E. Site Photographs: PD must provide at least one pre-redevelopment photograph of the property, in either hard copy or electronic format, that shows existing facilities and structures. Please note that the NCBP prefers to have electronic photos instead of or in addition to hard copies. Electronic copies of photographs should be emailed to: Shirley.Liggins@ncdenr.gov with a clear indication as to which Brownfields Application they apply to.

Are photographs of the property included with this application?

Answer Yes, please see Appendix E.

Have electronic copies of the photographs been emailed to NCBP?

Answer Yes

F. Environmental Reports/Data: If it makes an affirmative eligibility determination, the NCBP will request that PD provide any and all existing environmental reports and data for the property on **CD only**. The brownfields process may be expedited if PD submits such reports/data with this application.

Are any environmental reports/data being submitted with this application?

Answer Yes, please see disc attached to Appendix F.

If environmental reports/data are being submitted with this application, please provide the title, date and author of each item being submitted:

- 1) Feasibility Study, November 2008 (COE)
- 2) Chrome Assessment - COE Bldg 5/Eckerd Bldg 2, March 2005 (Hoffman)
- 3) Indoor Air Quality Assessment, March 2009 (AMEC)
- 4) Limited Site Assessment, November 2010 (Hoffman)
- 5) Phase I Executive Summary, June 1993 (Pilko & Assoc.)
- 6) Phase I Remedial Investigation, April 1999 (COE)
- 7) Proposed Plan, September 1999 (COE)
- 8) Revised Final Design Sampling for the CAMP, March 2013 (COE)
- 9) Rite Aid Environmental Summary, May 2015 (H&H)
- 10) Slide Presentation - Environmental Issues at CAMP, circa 2005
- 11) State Groundwater Sampling Report, March 2007 (COE)
- 12) NFA Letter- Incident #7617, April 2011 (DEQ)
- 13) NFA Letter - Incident #20520, September 1999 (DEQ)

#### IV. ADDITIONAL REQUIRED FORMS

The following forms are to be filled out and submitted with the application including the Responsibility and Compliance Affidavit and the Proposed Brownfields Agreement. Submittal of the Affidavit requires signature and notarization, and the Proposed Brownfields Application requires an initial.

**Appendix A**  
**Brownfields Affidavit**

NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTH CAROLINA BROWNFIELDS PROGRAM

IN THE MATTER OF: ATCO-Investments Group LLC (ATCO)

UNDER THE AUTHORITY OF ) AFFIDAVIT
NORTH CAROLINA GENERAL ) RE: RESPONSIBILITY
STATUTES 3 130A-310.30, et. seq. ) AND COMPLIANCE

ATCO , being duly sworn, hereby deposes and says:

- 1. I am <<Neil Adamson >> of ATCO.
2. [if signatory is not President, add this paragraph: "I am fully authorized to make the declarations contained herein and to legally bind ATCO."]
3. ATCO is applying for a Brownfields Agreement with the North Carolina Department of Environmental Quality, pursuant to N.C.G.S. 3 130A, Article 9, Part 5 (Brownfields Act), in relation to the following 07903105 and 07903102 parcel(s) in Charlotte, Mecklenburg , County, North Carolina: located at 1776 Statesville Road
4. I hereby certify, under the pains and penalties of perjury and of the Brownfields Act, that ATCO, and any parent, subsidiary or other affiliate meets the eligibility requirements of N.C.G.S. 3 130A-310.31(b)(10), in that it has a bona fide, demonstrable desire to develop or redevelop, and did not cause or contribute to the contamination at, the parcel(s) cited in the preceding paragraph.
5. I hereby certify, under the pains and penalties of perjury and of the Brownfields Act, that ATCO meets the eligibility requirement of N.C.G.S.3130A-310.32(a)(1) in that it and any parent, subsidiary or other affiliate have substantially complied with:
a. the terms of any brownfields or similar agreement to which it or any parent, subsidiary or other affiliate has been a party;
b. the requirements applicable to any remediation in which it or any parent, subsidiary or other affiliate has previously engaged;
c. federal and state laws, regulations and rules for the protection of the environment.

Affiant further saith not.

Signature/Printed Name: Neil Adamson

Date

Sworn to and subscribed before me

this 22 day of June, 2016.

Notary Public

My commission expires: September 15, 2018

ANDREW ROBERT NAIRIN
NOTARY PUBLIC, State of New York
No. 01NA6311378
Qualified in New York County
Commission Expires September 15, 2018

(SEAL)

**Appendix B**  
**Proposed Brownfields Agreement**

# Preliminary Proposed Brownfields Agreement

## I. Property Facts

a. Property Address(es): 1776 Statesville Avenue (Mecklenburg Co. Parcel #s 07903102 and 07903105) in Charlotte, Mecklenburg Co., North Carolina

b. Property Seller: Eckerd of North Carolina, Inc. (Parcel #07903105) and Bancroft Realty (Parcel #07903102)

c. Property Buyer: ATCO

d. Brief Property Usage History: The site was developed for industrial use in 1924 and was initially used for the manufacture of Model T Fords until approximately the 1930s. The Rite Aid property, the Hercules Industrial property to the north (currently a Brownfields site), and the MV Tryon property to the east were used by the United States Government as a storage depot from the early-1940s to the mid-1950s and then for the production of Hercules missiles from the mid-1950s to the late-1960s. The missile production facility was known as the Charlotte Army Missile Plant (CAMP). Since the late 1960s, the Rite Aid property has been used by Eckerd/Rite Aid for warehousing and distribution of commercial/retail items. Rite Aid is currently in the process of vacating the site.

e. The planned reuse will potentially involve the following use classification(s) (check all that apply):

- School/childcare/senior care
- Residential
- Commercial, retail (specify)
- Other commercial (specify)
- Office
- Light industrial
- Heavy industrial
- Recreational
- Open space
- Other (specify)

## II. Contaminant Information

a. The contaminant situation at the property is best described by the following (check all that apply):

- Contaminants are from an on-property source(s)
- Contaminants are from an off-property source(s)
- Contaminants are from an unknown source(s)
- Contaminants have not yet been documented on the property

b. Contaminated Media Table. (If known, check appropriate boxes below)

Contaminant Types	Soil		Groundwater and/or Surface Water		Private Wells		Vapor Intrusion		
	known	Suspected	known	Suspected	known	suspected	known	suspected	
o r g a n i c s	Chlorinated Solvents (list):			TCE PCE					
	Petroleum: ASTs <input type="checkbox"/> USTs <input checked="" type="checkbox"/> Other <input type="checkbox"/>	TPH VOCs SVOCs		BTEX MTBE					
	Other (list):			chloroform, IPE EDB					
i n o r g a n i c s	Metals (list):	Cr							
	Other (list):								

**III. Protective Measures**

I am prepared to take steps necessary to make the property suitable for its planned uses while fully protecting public health and the environment. I propose that NCBP consider a brownfields agreement that will make the property suitable for the planned use(s) through the following mechanism(s) (check all that apply):

- Contaminant remediation to risk-based levels.
- Engineered Controls (e.g., low permeability caps, vapor mitigation systems, etc)
- Land use restrictions that run with the land that will restrict or prohibit uses that are unacceptable from a risk assessment/management perspective. (*Important Note: In any*

*final brownfields agreement generated by the NCBP, land use restrictions will ultimately come with the continuing obligation to submit an annual certification that the Land Use Restrictions are being complied with and remain recorded at the applicable register of deeds office.)*

#### IV. Fees

In connection with a brownfields agreement, the Act requires that the developer pay fees to offset the cost to the Department of Environmental Quality and the Department of Justice. In satisfaction of the Act, the following fees apply to a brownfields agreement that is developed for this project under the standard program, subject to negotiation of the brownfields agreement:

- a. A \$2,000 initial fee will be due from the applicant PD when **both** of the following occur:
  - 1) NCBP receives this application, the affidavit and proposed brownfields agreement, AND
  - 2) NCBP notifies the applicant in writing that the applicant PD and the project are eligible for participation in the NCBP and continued negotiation of a brownfields agreement.
- b. A second fee of \$6,000 will be due from the PD prior to execution of the brownfields agreement. Should the prospective developer choose to negotiate changes to the agreement that necessitate evaluation by the Department of Justice, additional fees shall apply.
- c. Any addendum/modifications to the BFA or NBP after they are in effect will result in an additional fee of at least \$1,000.
- d. In the unexpected event that the environmental conditions at the property are unusually complex, such that NCBP's costs will clearly exceed the above amounts, NCBP and PD will negotiate additional fees.
- e. Additional fees are charged for the Ready for Reuse and Redevelopment Now programs.

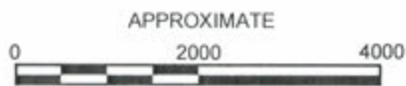
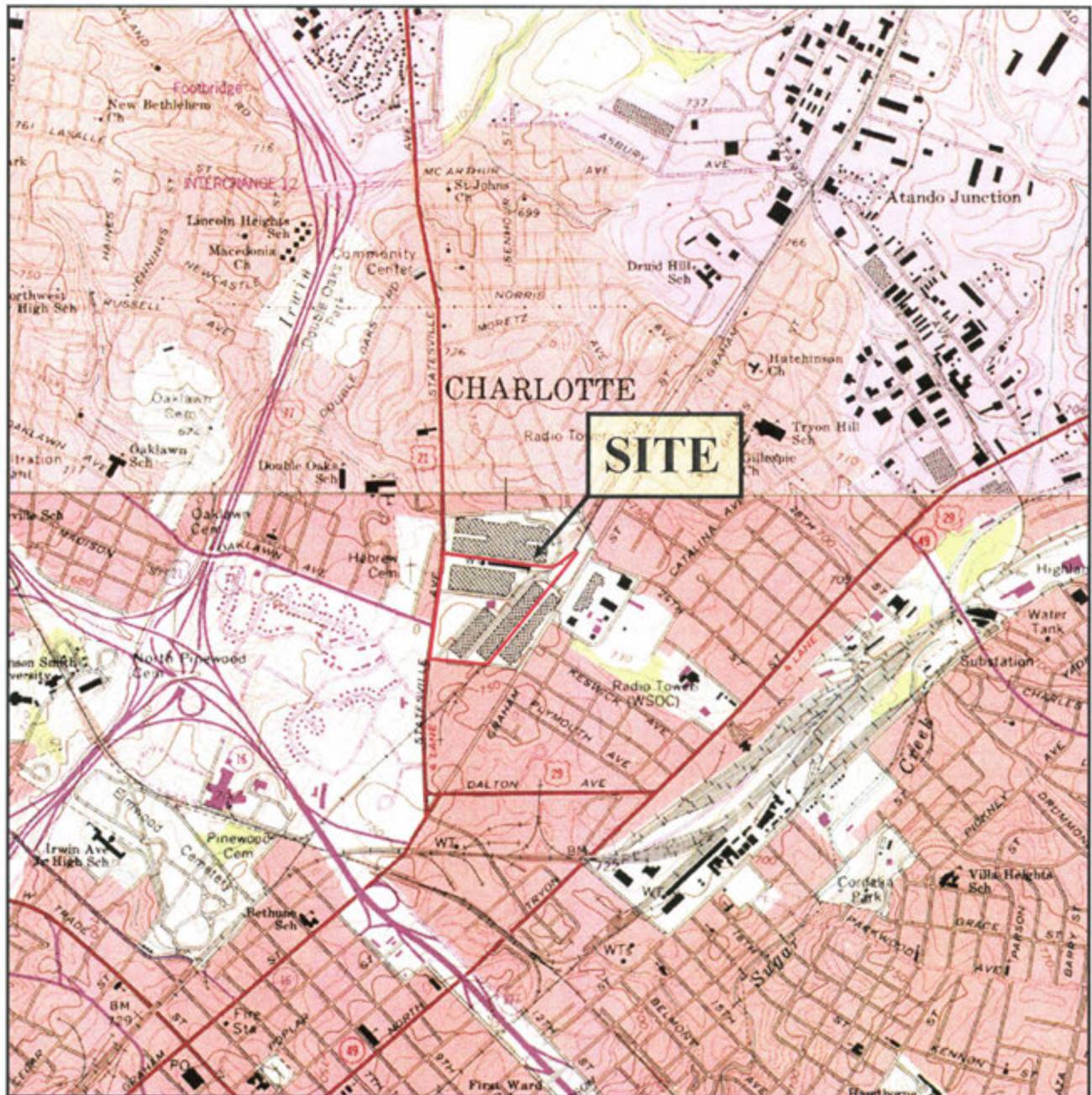
\_\_\_\_\_ Please check this box and initial in space provided to indicate your acknowledgement of the standard brownfields fee structure.

*NSA* Please check this box and initial in space provided to indicate your interest in the Ready for Reuse or the Redevelopment Now programs, and your acknowledgement of the alternate fee structure as outlined in the Ready for Reuse or the Redevelopment Now Fee Consent Document (under separate cover).

Date of Submittal: \_\_\_\_\_

*not complete*

Appendix C  
USGS Topographic Map



U.S.G.S. QUADRANGLE MAP

CHARLOTTE EAST, NC  
1967

REVISED/INSPECTED 1988  
AND

DERITA, NC 1993  
QUADRANGLE

7.5 MINUTE SERIES (TOPOGRAPHIC)

TITLE	SITE LOCATION MAP	
PROJECT	RITE AID CHARLOTTE, NORTH CAROLINA	
		
<small>2923 South Tryon Street-Suite 100 Charlotte, North Carolina 28203 704-586-0007 (p) 704-586-0373 (f)</small>		
DATE:	5-2-16	REVISION NO: 0
JOB NO:	ATL-001	FIGURE NO: 1

**Appendix D**  
**Survey and Property Deed**

State of North Carolina

MECKLENBURG

COUNTY

Printed and for sale by  
SCALE OFFICE SUPPLIES, LTD.  
Charlotte, N.C.

REGISTERED  
REGISTRATION  
'77 SEP 1 AM D. 1977  
REGISTER OF DEEDS  
MECKLENBURG CO. N.C.

This Deed Made this 31st day of August

by and between

PAT HALL ENTERPRISES, INC.

a corporation organized and existing under and by the virtue of the laws of the State of North Carolina with its principal office located at Charlotte of the County of Mecklenburg and State of North Carolina party of the first part, and

ECKERD OF NORTH CAROLINA, INC.

of the County of and State of party of the second part.

Witnesseth. That the said party of the first part, in consideration of One Hundred Dollars (\$100) and other valuable considerations to it paid by the party of the second part, the receipt of which is hereby acknowledged, has bargained and sold, and by these presents, doth grant, bargain, sell and convey unto the said party of the second part and its successors and its heirs all that certain tract of land, situate, lying and being in City of Charlotte Mecklenburg County, State of North Carolina, and more particularly described as follows:

Beginning at a point in the center line of Statesville Avenue, said point or place of beginning being N. 8-46-57 E. 222.06 feet from the intersection of the center line of Oaklawn Avenue and the center line of Statesville Avenue, running thence with the center line of Statesville Avenue three courses: (1) N. 8-46-56 E. 164.77 feet, (2) N. 8-20-26 E. 267.22 feet, (3) N. 5-45-56 E. 225.12 feet; thence S. 83-34-17 E. 387.79 feet to a point; thence N. 24-21-58 E. 32.55 feet to a point; thence N. 13-56-36 E. 43.51 feet to a point; thence N. 87-41-46 E. 10.15 feet to a point; thence with the arc of a circular curve to the left having a radius of 14.25 feet, a distance of 11.20 feet to a point; thence N. 40-11-15 E. 9.55 feet to a point; thence with the arc of a circular curve to the right having a radius of 13 feet, a distance of 10.19 feet to a point; thence S. 87-47-11 E. 27.70 feet to a point; thence S. 57-28-44 E. 35.37 feet to a point; thence S. 82-52-59 E. 239.38 feet to a point; thence S. 14-19-53 W. 5.62 feet to a point; thence S. 83-35-29 E. 18.88 feet to a point; thence S. 8-05-34 W. 8.66 feet to a point; thence S. 83-18-21 E. 148.70 feet to a point; thence N. 60-09-35 E. 21.24 feet to a point; thence S. 82-55-31 E. 126.06 feet to a point; thence S. 60-39-18 E. 31.32 feet to a point; thence S. 83-13-18 E. 103.60 feet to a point; thence S. 6-39-53 W. 15.63 feet to a point; thence S. 87-01-58 E. 190.86 feet to a point; thence S. 86-31-40 E. 68.87 feet to a point; thence N. 66-15-12 E. 37.37 feet to a point; thence with the arc of a circular curve to the left having a radius of 700 feet, a distance of 402.81 feet to a point; thence N. 33-21-02 E. 255.40 feet to a point in the railroad right of way; thence S. 18-49-30 E. 47.46 feet to a point; thence S. 31-10-43 W. 321.40 feet to a point; thence S. 33-45-00 W. 80 feet to a point; thence S. 36-50-00 W. 100 feet to a point; thence S. 38-50-00 W. 52.03 feet to a point; thence S. 38-50-00 W. 47.97 feet to a point; thence S. 39-50-00 W. 28.74 feet to a point; thence N. 54-01-17 W. 35.25 feet to a point; thence N. 36-09-18 E. 74.26 feet to a point; thence N.

DEED BOOK PAGE

1234  
1987

45-30-22 W. 30.64 feet to a point; thence S. 57-37-03 W. 50 feet to a point; thence S. 62-28-39 W. 50 feet to a point; thence S. 69-57-09 W. 50 feet to a point; thence S. 74-14-37 W. 44.65 feet to a point; thence S. 74-34-54 W. 100 feet to a point; thence S. 67-19-39 W. 50 feet to a point; thence N. 25-04-58 W. 10 feet to a point; thence S. 62-30-27 W. 50.92 feet to a point; thence S. 55-24-46 W. 101.87 feet to a point; thence S. 43-12-15 W. 110.76 feet to a point; thence S. 40-08-36 W. 203.71 feet to a concrete monument; thence N. 83-23-11 W. 545.63 feet to a fence corner; thence S. 6-31-47 W. 267.80 feet to spike; thence N. 83-05-41 W. 412.25 feet to the point or place of beginning, as shown by Boundary Survey of Spratt-Seaver, Inc., dated August 18, 1977.

This conveyance is made subject to easements of Duke Power Company and Southern Bell Telephone and Telegraph Company, right of way of Southern Railway Company and right of way of Statesville Avenue as shown on the aforesaid plat.

There is hereby reserved an easement for electric power transmission lines installed and in use from the hereinabove described property to the property being retained by party of the first part and to provide service for said property. Being in all respects a part of the property conveyed by United States of America to Eighteen-Twenty, Inc. (now Pat Hall Enterprises, Inc. by merger) by Deed recorded in Book 2905 at Page 447 of the Mecklenburg Registry.

State of North Carolina

MECKLENBURG COUNTY

Printed and For Sale by  
SALE OFFICE OUTFITTERS, LTD.  
Charlotte, N. C.

RECORDED

Dec. 11, 1975

443

This Deed Made this 31st day of December

by and between

PAT HALL ENTERPRISES, INC.

a corporation organized and existing under and by the virtue of the laws of the State of North Carolina with its principal office located at Charlotte of the County of Mecklenburg and State of North Carolina party of the first part, and

BANCROFT REALTY COMPANY

of the County of and State of part Y of the second part,

Witnesseth, That the said party of the first part, in consideration of One Hundred Dollars (\$100) and other valuable considerations

to it paid by the part Y of the second part, the receipt of which is hereby acknowledged, has bargained and sold, and by these presents, doth grant, bargain, sell and convey unto the said party of the second part

and its successors all that certain tract of land, situate, lying and being in City of Charlotte Mecklenburg County, State of North Carolina, and more particularly described as follows:

BEGINNING at a nail and cap in the centerline of Statesville Avenue, said point or place of beginning being N. 8-46-56 E. 222.06 feet from the intersection of the centerline of Oaklawn Avenue and the centerline of Statesville Avenue; running thence S. 83-05-41 E. 412.25 feet to a spike in pavement; thence N. 6-31-47 E. 267.80 feet to a fence corner; thence S. 83-23-11 E. 545.63 feet to a concrete monument; thence N. 40-08-36 E. 203.71 feet to an iron; thence N. 43-12-15 E. 110.76 feet to an iron; thence N. 55-24-46 E. 101.87 feet to an iron; thence N. 62-30-27 E. 50.92 feet to an iron; thence S. 25-04-58 E. 10.00 feet to an iron; thence N. 67-19-39 E. 50.00 feet to an iron; thence N. 74-34-54 E. 100.00 feet to an iron; thence N. 74-14-37 E. 44.65 feet to an iron; thence N. 69-57-09 E. 50.00 feet to an iron; thence N. 62-28-39 E. 50.00 feet to an iron; thence N. 57-37-03 E. 50.00 feet to a spike in the centerline of railroad tracks; thence S. 45-30-22 E. 30.64 feet; thence S. 36-09-18 W. 74.26 feet to a fence corner; thence S. 54-01-17 E. 22.28 feet to an iron; thence S. 33-31-14 W. 28.33 feet; thence S. 34-11-29 W. 49.92 feet; thence S. 39-07-10 W. 49.87 feet; thence S. 39-48-15 W. 1282.99 feet; thence S. 40-14-30 W. 59.56 feet; thence S. 41-15-15 W. 49.84 feet; thence S. 42-01-17 W. 41.56 feet; thence S. 42-01-17 W. 15.87 feet to a concrete monument; thence N. 84-16-06 W. 727.75 feet to a nail and cap in the centerline of Statesville Avenue; thence with the centerline of Statesville Avenue to a nail and cap N. 6-44-49 E. 200.65 feet; thence continuing with the centerline of Statesville Avenue N. 8-46-56 E. 455.35 feet to the point or place of beginning, as shown by Boundary Survey of Spratt-Seaver, Inc., dated December 12, 1975, Drawing No. 75-12-02.

Being in all respects a part of the property conveyed by United States of America to Eighteen-Twenty, Inc. (now Pat Hall Enterprises, Inc. by merger) by Deed recorded in Book 2905 at Page 447 of the Mecklenburg Registry, reference to which is hereby made.

This conveyance is made subject to utility easements, right of way of Southern Railway Company and right of way of Statesville Avenue as shown on the aforesaid plat.

There is hereby granted to the Party of the Second Part an easement for electric power transmission lines from Graham Street to the above-described property where the electric power transmission lines are now located, and there is hereby reserved an easement for electric power transmission lines from the hereinabove described property to the property being retained by Party of the First Part where the electric power transmission lines are now located.







**SYMBOL LEGEND**

- CL chond
- CMP corrugated metal pipe
- CB catch basin
- CH chond
- IPF iron pipe found
- IR/RS iron rebar (pin) found/feet
- L,R curve length & radius
- MB,DB map/deed book reference
- NO not observed
- PV post indicator valve
- PK/PKS pit nail found/feet
- PCP reinforced concrete pipe
- S,F square feet (by coordinates)
- GA gas meter
- GA grey anchor
- PA power pole
- LI light pole
- PO transformer
- PM power meter
- HY hydrant
- FC fire dept. connection
- TE telephone riser
- MA telephone manhole
- CTV cable tv riser
- SM sanitary sewer manhole
- SS sanitary sewer deep-out
- SM storm sewer manhole
- WV water valve
- WV water vault
- SM storm water inlet
- EW environmental well
- EW electric well
- VE vehicular gate
- VB vehicular barrier
- R.F. reflecting signal
- FB buried fiber-optic marker
- TBM temporary bench mark

**LINE LEGEND**

- X- fence line
- SS- sanitary sewer line
- GAS- underground gas line
- UE- underground electric line
- OU- overhead utilities line
- T- underground telecom line
- W- underground water line
- ▨ designated no-parking area

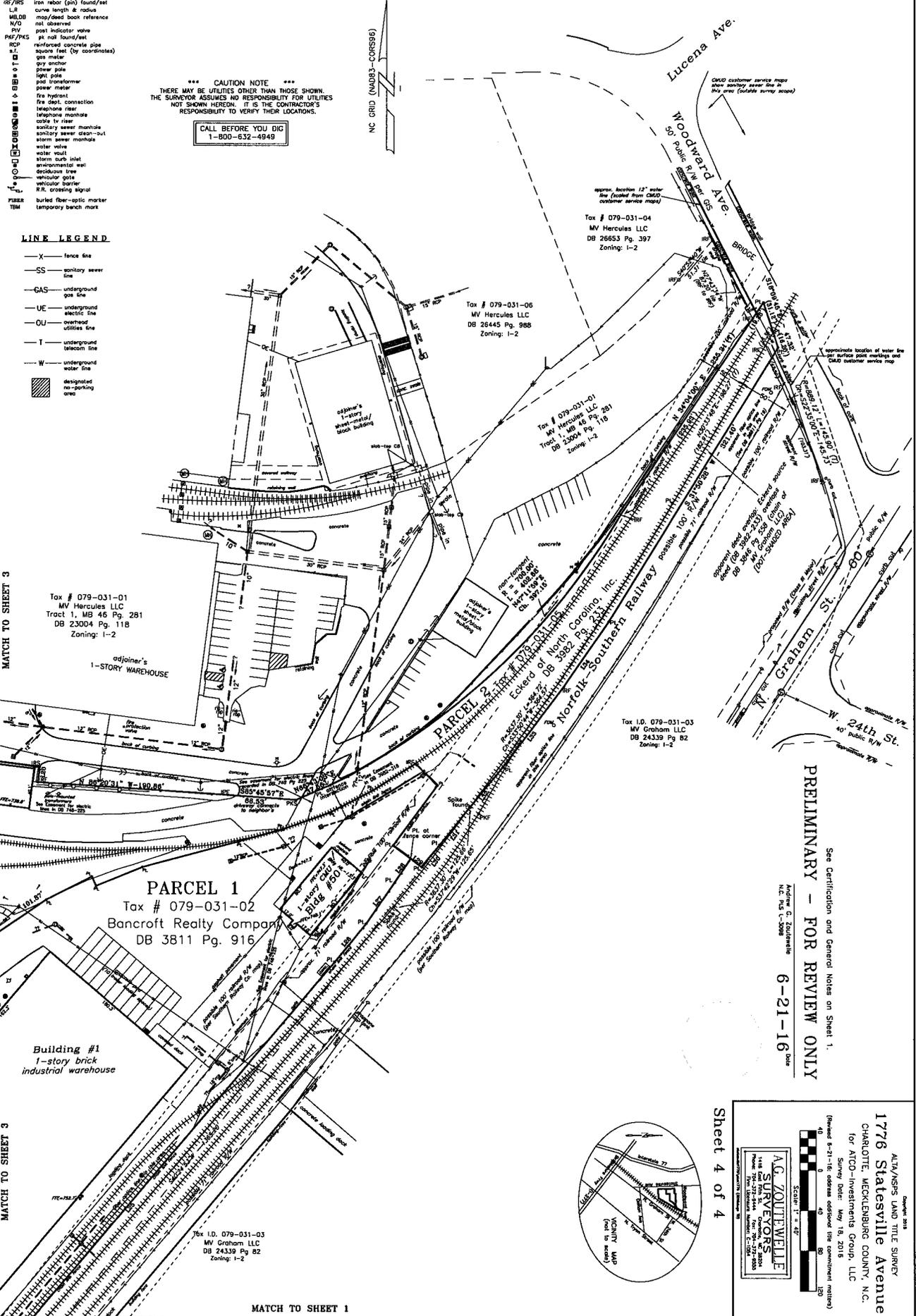
\*\*\* CAUTION NOTE \*\*\*  
 THERE MAY BE UTILITIES OTHER THAN THOSE SHOWN.  
 THE SURVEYOR ASSUMES NO RESPONSIBILITY FOR UTILITIES  
 NOT SHOWN HEREON. IT IS THE CONTRACTOR'S  
 RESPONSIBILITY TO VERIFY THESE LOCATIONS.

CALL BEFORE YOU DIG  
 1-800-632-4949

MATCH TO SHEET 3

MATCH TO SHEET 3

MATCH TO SHEET 1



PRELIMINARY - FOR REVIEW ONLY

See Certification and General Notes on Sheet 1.  
 Andrew C. Zollwelle  
 N.C. P.L.S. # 3088

6-21-16

Sheet 4 of 4

**A.G. ZOLLWELLE**  
 SURVEYORS

1118 First Street, Charlotte, NC 28202  
 Phone: 704.375.1118 Fax: 704.375.1119  
 Email: azollwelle@agzollwelle.com

SCALE: 1" = 40'

DATE: 6-21-16

PROJECT: 1776 Statesville Avenue  
 CHARLOTTE, MECKLENBURG COUNTY, N.C.  
 FOR: AICO-Investments Group, LLC  
 Survey Date: May 18, 2016  
(Revised 6-21-16 to address additional file government matters)

**Appendix E**  
**Site Photographs**



Photograph 1: General overview of Building 1 .



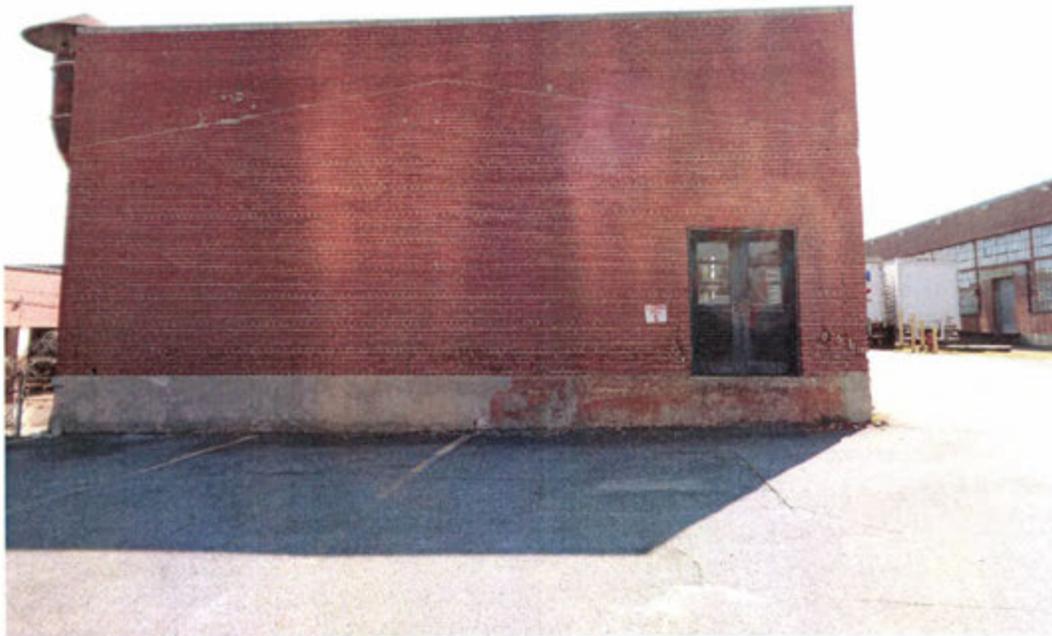
Photograph 2: General overview of Building 2.



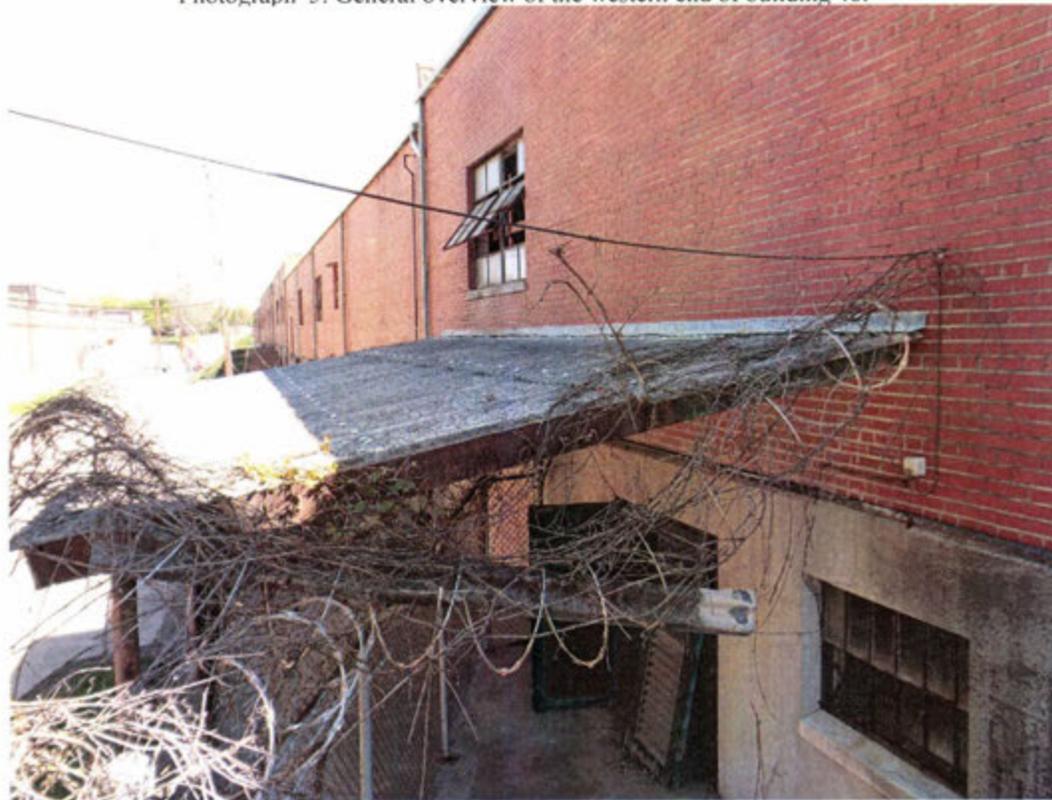
Photograph 3: General overview of Building 3.



Photograph 4: General overview of Area A.



Photograph 5: General overview of the western end of building 48.



Photograph 6: General overview of the northern side of building 50.



Photograph 7: General overview of Building 50 from the southwest corner.



Photograph 8: General overview of the Boiler House Building.



Photograph 9: Typical office area in the site buildings.



Photograph 10: Typical employee break room in the site buildings.



Photograph 11: Typical storage and distribution operations within the site buildings.



Photograph 12: Typical non-flammable chemical and paint storage in Building 1.



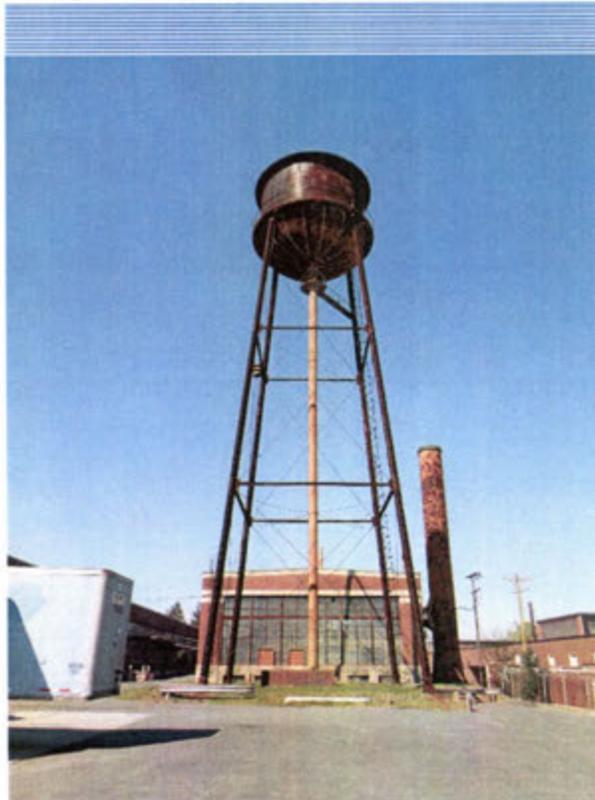
Photograph 13: Flammable storage cabinet in Building 1 maintenance area.



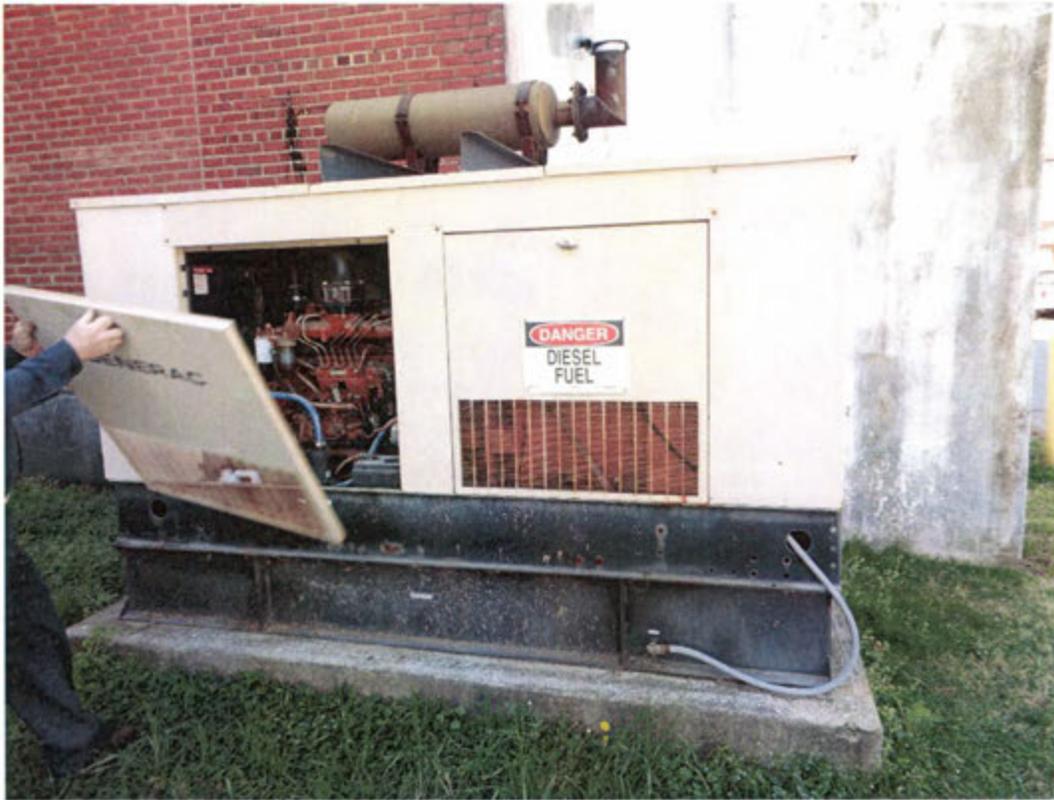
Photograph 14: Mineral spirit based parts washer in the Building 1 maintenance area.



Photograph 15: 55-gallon drum of virgin hydraulic oil located within Building 48 .



Photograph 16: Water tower adjacent to the Boiler House Building



Photograph 17: Emergency generator with diesel belly tank adjacent to Building 1.



Photograph 18: Diesel AST fueling at the emergency generator adjacent to Building 2.



Photograph 19: Drums of water treatment chemicals located in the Building 2 boiler room.



Photograph 20: Typical shipping area in the site buildings



Photograph 21: Air compressor unit in Building 1.



Photograph 22: Air compressor in Building 2.



Photograph 23: Typical forklift charging station in Building 1.



Photograph 24: Typical forklift charging station in Building 2.



Photograph 25: Typical dry type transformer located in the site buildings.



Photograph 26: Floor drain located in the Building 1 boiler room.



Photograph 27: Floor drain located within Building 2.



Photograph 28: Typical floor drain located in Building 48



Photograph 29: Monitor wells located south of Building 48.



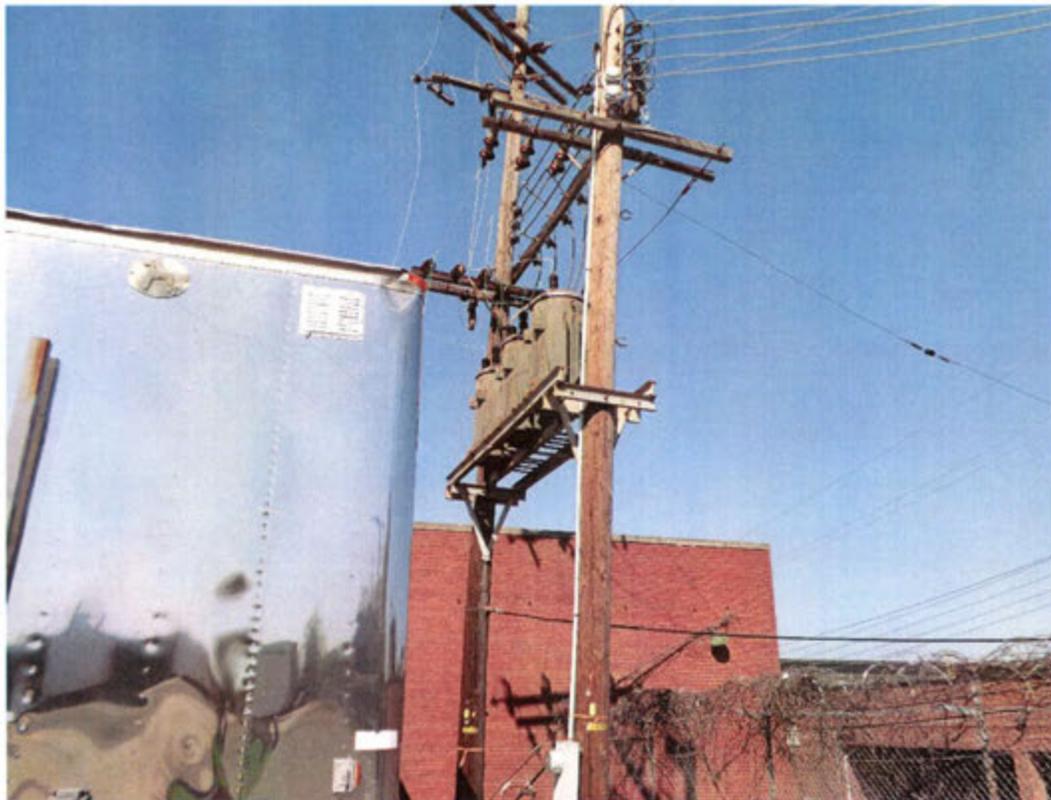
Photograph 30: Monitor wells located within a former UST basin adjacent to the northeast corner of Building 2.



Photograph 31: Monitor well located off the northwest corner of Building 48.



Photograph 32: Pole mounted transformer located outside the west central portion of Building 1.



Photograph 33: Pole mounted transformer adjacent to the east side of Building 48.



Photograph 34: Typical dumpster.



Photograph 35: Former electro plating pit located in Building 1.



Photograph 36: Former electro plating pit located in Building 2.



Photograph 37: Typical storm drain located throughout the site.



Photograph 38: Typical boiler unit located in the three main site buildings.

## Appendix F

### Environmental Reports

- 1) Feasibility Study, November 2008 (COE)
- 2) Chrome Assessment - COE Bldg 5/Eckerd Bldg 2, March 2005 (Hoffman)
- 3) Indoor Air Quality Assessment, March 2009 (AMEC)
- 4) Limited Site Assessment, November 2010 (Hoffman)
- 5) Phase I Executive Summary, June 1993 (Pilko & Assoc.)
- 6) Phase I Remedial Investigation, April 1999 (COE)
- 7) Proposed Plan, September 2009 (COE)
- 8) Revised Final Design Sampling for the CAMP, March 2013 (COE)
- 9) Rite Aid Environmental Summary, May 2015 (H&H)
- 10) Slide Presentation - Environmental Issues at CAMP, circa 2005
- 11) State Groundwater Sampling Report, March 2007 (COE)
- 12) NFA Letter- Incident #7617, April 2011 (DENR)
- 13) NFA Letter - Incident #20520, September 1999 (DENR)

\*Environmental Reports have been compiled on a CD and included with the hard copy of the application