

**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	JW Industrial Group, LLC
Principal Officer	J. Will Dellinger, Manager
Representative	
Mailing Address	2130 North Tryon Street Charlotte, NC 28206
E-mail address	will@jwdemolition.com
Phone No.	704.332.7150
Fax No.	704.332.7151
Web site	www.jwdemolition.com

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

Name  
Company  
Mailing Address  
  
E-Mail Address  
Phone No.  
Fax No.

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	James William Dellinger, Jr.
Ownership (%)	100%
Mailing Address	2130 N. Tryon Street Charlotte, NC 28206
E-Mail Address	will@jwdemolition.com
Phone No.	(704) 332-7150
Fax No.	

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

Name	James William Dellinger, Jr.
Ownership (%)	100%
Mailing Address	2130 N. Tryon Street Charlotte, NC 28206
E-Mail Address	will@jwdemolition.com
Phone No.	(704) 332-7150
Fax No.	

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.

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    **Approximately \$564,000 is remaining in an \$800,000 environmental escrow that was established to fund finalization of the Brownfields Agreement for this property. The \$236,000 expended to date has been utilized to perform extensive assessment and reporting work at the property (to be submitted to NCDEQ) to establish baseline environmental conditions in support of the BFA. This escrow is also planned to be utilized to perform closure of existing coal combustion byproduct (CCB) ponds located on the property. Remaining funds will be expended to complete additional work required by NCDEQ to complete the BFA.**

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 [Geosyntec Consultants of NC, PC to guide](#)

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 [Geosyntec Consultants of NC, PC to guide](#)

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

*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

[David Fraimow, LBC Credit Partners, Inc., Cira Centre, 2929 Arch Street, Suite 1550, Philadelphia, PA 19104-7340 \(215\) 972-89024 or \[dfraimow@lbccredit.com\]\(mailto:dfraimow@lbccredit.com\)](#)

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. 9/13/16

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)? Note: the Act requires the PD to demonstrate that it intends to either buy or sell the property.

- 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.)*

Not yet acquired

## II. SITE INFORMATION

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

Proposed project name True Textiles - reference NCDEQ Brownfields Project Number 19083-15-86.

acreage 72+ (summation of parcels) street address(es) The main parcel is located at 321 (formerly 304) East Main Street. Other parcels do not appear to have physical street addresses. Reference NCDEQ Brownfields Project Number 19083-15-86.

city Elkin County Surry zip 28621

tax ID(s) or PIN(s) 495115534150, 495115641270, 495115528796, 495115521832. See Attachment 1 and Attachment 2.

past use(s) textile mill since 1890s

current use(s) textile mill

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

known Historic and current use of Site as a textile plant has lead to CVOC and petroleum related groundwater impacts and arsenic impacts in surface soil

suspected An August 2015 Phase I ESA completed by Hart Hickman identified 12 RECs at the main mill facility

- 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: [N.C. Division of Waste Management - UST Program/00-0-0-0000000876](#) inclusive of multiple USTs listed under this ID No. all listed as removed. See Attachment 3 for UST List excerpt from Environ's July 2007 ESA and Limited Compliance Review.

Agency Name/ID No: [NCDEQ Brownfields Project Number 19083-15-86](#)

Agency Name/ID No: [NCDENR Title V Air Quality Permits/No. 01315T21](#)

Agency Name/ID No: [NPDES/No. NCG500000 and No. NCG170000](#)

Agency Name/ID No: [NCDENR/No. WQ0013982](#) (permit to land apply sludge off-site)

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

The buildings on the main mill facility parcels total 1.5 million square feet of which 1.1 million square feet is unused. In addition to the under-utilized building space, land at the site is also under-utilized. Unclosed coal combustion biproduct (CCB) ponds are located on the southern parcel and inhibit use/redevelopment. See Attachment 4 for current and former Site building usage.

- 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 proposed lessee and prospective developer are concerned about existing impacts to groundwater and soil and presence of CCBs. To facilitate reuse of the property, mitigation measures may be required. These measures will make the property more desirable to interested buyers and lessees.

- 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 form lending institutions)?

Underlying impact to groundwater and the residual soil impacts associated with the property leave potential buyers and future tenants trepidatious. A Brownfields Agreement would provide interested buyers protection from the associated environmental liability. In addition, relocating the textile mill operations will open up the existing parcels to alternative uses.

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

The intent is to comprehensively redevelop the property. The property is located on the Yadkin River and would be ideal for recreation, retail and business use. The intent is to work with the Elkin Redevelopment Council and/or form a public-private partnership (P3) to convert the property into a mixed use area benefiting the surrounding community. As part of this effort, JW Industrial Group plans to close the CCB ponds in place to eliminate the existing attractive nuisance and human health and safety/exposure hazard. The redevelopment may be conducted in stages. The first stage would be the relocation of the textile operations to facilitate desirable reuse. The property currently has over 80 structures on site many of which are antiquated and do not meet current building code and are not eligible for certificate of occupancy. Selective green demolition and recycling of materials will facilitate future new development and new structures built to current standards and code and improve the access, curb-appeal, and green space site wide. A market analysis will be performed to help evaluate use options. Usable buildings will be separated/subdivided for future users and utilities will be separated where applicable making buildings efficient and affordable for small businesses to lease. JW Industrial Group ultimately desires to divest themselves of portions of the property and sell in part to new users and developers. In the near term, JW Industrial Group plans several beneficial reuse and redevelopment steps which create jobs, reutilize currently unoccupied building space and utilizes the property for community benefit.

G. Current tax value of brownfields property: \$1.9M

H. Estimated capital investment in redevelopment project: \$2.5M

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 following are public benefits that would result from the property's redevelopment: 1. Job creation: Currently there are 110 people employed at the textile mill. These jobs would be preserved during the relocation of the textile mill operations and additional jobs would be created as property was converted to a mixed use area for the community. 2. Tax base increases: Opening up this site to new businesses will increase the tax base. 3. Revitalization of blighted areas: Currently the area is underused. The redevelopment, potential environmental cleanup, and relocation of the textile operations will help revitalize the area. 4. Preserved green space: The property occupies a great location along the Yadkin River. If the now underused land was used for recreation purposes, the community would have increased green space access 5. Retail shopping opportunities: The plan to convert this to a mixed use space would include opportunities for retailers to move into the space. 6. Environmental cleanup activities: In order to redevelop the area and make it desirable to buyers, groundwater and soil impacts and CCB may need to be addressed.

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.

JW Industrial Group will recycle/resell or reuse a percentage of demolition debris including but not limited to brick, timbers and scrap metal.

- 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                      JW Industrial Group, LLC  
Mailing Address        2130 North Tryon Street  
                                  Charlotte, NC 28206  
E-Mail Address        will@jwdemolition.com  
Phone No.              704.332.7150  
Fax No.                 704.332.7151

### 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. It must be filled out signed notarized, and submitted with this application.)*  
Is the required affidavit, as described above, included with this application?

Answer                yes

- 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

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 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 as the base for its location map.)*

Is the required location map included with this application?

Answer            [yes. See attached Figure 1 \(Attachment 1\).](#)

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            [no](#)

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](mailto: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, see Attachment 5.](#)

Have electronic copies of the photographs been emailed to NCBP?

Answer            [no](#)

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            [Reference reports previously provided as NCDEQ Brownfields Project Number 19083-15-86.](#)

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

[None.](#)

#### **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.**

**NORTH CAROLINA DEPARTMENT OF ENVIRONMENT  
AND NATURAL RESOURCES  
NORTH CAROLINA BROWNFIELDS PROGRAM**

**IN THE MATTER OF: <<JW Industrial Group, LLC>>**

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

<<J. William Dellinger, Jr.>>, being duly sworn, hereby deposes and says:

1. I am <<Manager>> of JW Industrial Group, LLC.
2. [if signatory is not President, add this paragraph: "I am fully authorized to make the declarations contained herein and to legally bind <<JW Industrial Group, LLC>>."]
3. JW Industrial Group, LLC is applying for a Brownfields Agreement with the North Carolina Department of Environment and Natural Resources, pursuant to N.C.G.S.   130A, Article 9, Part 5 (Brownfields Act), in relation to the following <<495115641270, 495115534150, 495115521832, 495115528796>>parcel(s) in <<Elkin>>, <<Surry>> , County, North Carolina: <<321 (formerly 304) East Main St,>>
4. I hereby certify, under the pains and penalties of perjury and of the Brownfields Act, that <<JW Industrial Group, LLC>>, and any parent, subsidiary or other affiliate meets the eligibility requirements of N.C.G.S.   130A-310.31(b)(10), in that it has a *bona fide*, demonstrable desire to **buy**  **sell**  for the purpose of developing or redeveloping, 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 <<JW Industrial Group, LLC>> meets the eligibility requirement of N.C.G.S.   130A-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

\_\_\_\_\_  
Date

Sworn to and subscribed before me

this 17 day of September, 2016.

Tina L. Mitchem Notary Public

My commission expires: 4-15-19



# Preliminary Proposed Brownfields Agreement

## I. Property Facts

- a. Property Address(es): 321 (formerly 304) East Main Street Elkin, NC
- b. Property Seller: LBC Sub III, LLC
- c. Property Buyer: JW Industrial Group, LLC
- d. Brief Property Usage History: textile mill since 1890s
- 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):		PCE TCE DCE TCA DCA					yes
	Petroleum: ASTs <input type="checkbox"/> USTs <input checked="" type="checkbox"/> Other <input type="checkbox"/>		DRO Benze ne					yes
	Other (list):							
i n o r g a n i c s	Metals (list):		Ar Cr Pb					
	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 are 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 Environment and Natural Resources and the Department of Justice. In satisfaction of the Act, the following fees apply to any brownfields agreement that is developed for this project, subject to negotiation of the brownfields agreement:

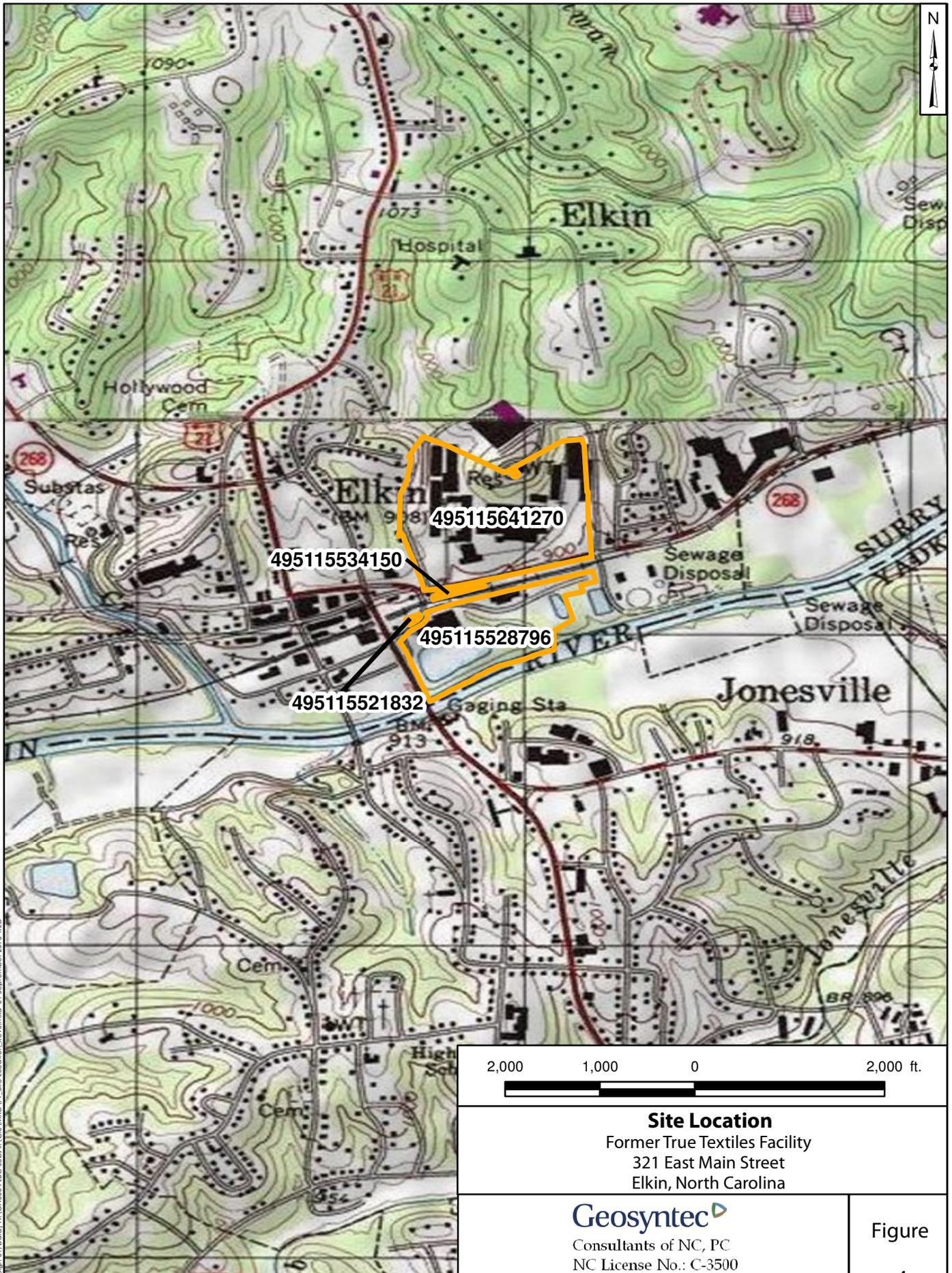
- a. A \$2,000 initial fee will be due from the applicant PD when **both** of the following occur:
  - 1) NCBP receives this application and proposed brownfields agreement, AND
  - 2) NCBP notifies the applicant in writing that the applicant PD and the project are eligible for participation in the NCBP 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.

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

Date of Submittal: 20 September 2016

Per the NCDEQ Brownfields Regulator, re-submittal of BFA fees for the referenced Site are not required. The BFA fees for the Site were previously paid for by LBC SUB III, LLC.

## Attachment 1



Path: \\Raleigh-01\Data\GIS\GN60541BC\_Subs\GIS\WXD\F1\_Site\_Location\_Rev0.mxd 01 September 2016 4:04 PM

Source: 2013 National Geographic Society, i-cubed



**Site Location**  
 Former True Textiles Facility  
 321 East Main Street  
 Elkin, North Carolina

**Geosyntec**  
 Consultants of NC, PC  
 NC License No.: C-3500

Figure  
**1**

Raleigh, NC

September 2016

## Attachment 2

# Former True Textiles Property Parcels (Owned by LBC, LLC)

Part of True Textiles  
property, but not part  
of Brownfields proposal



# Overview of Elkin Parcels owned by LCB, LLC (Former True Textiles)

Part of True Textiles property, but not part of Brownfields proposal  
495114227884



Town Water Tower

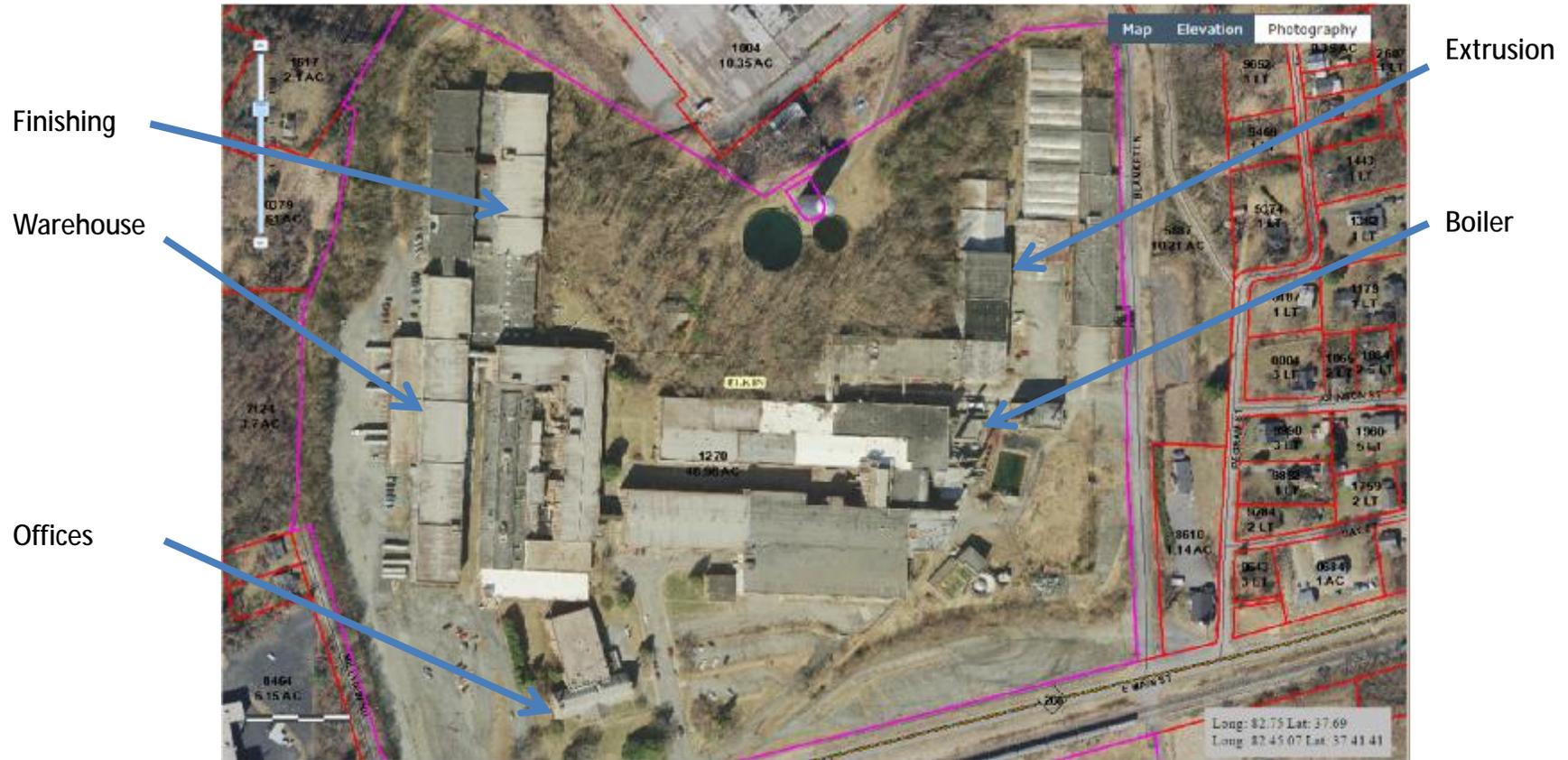
Primary Plant Parcel  
495115641270

Misc Parcel 1  
495115534150

Misc Parcel 2  
495115521832

Weave II & III Parcel  
495115528796

# Primary Plant Parcel





## Attachment 3

PRIVILEGED AND CONFIDENTIAL  
PREPARED AT THE REQUEST OF COUNSEL

Tank ID	Date Installed	Contents	Capacity (gallons)
1	11/5/61	Varsol	5,300
2	11/5/61	Soap	10,600
3	10/5/66	Gasoline	550
4	11/5/61	Fuel oil	11,165
5	8/5/74	Diesel	6,000
6	10/5/66	Diesel	10,000
7	10/5/66	Gasoline	6,000
8	6/5/80	Gasoline	4,000
9	10/5/66	Oil	550
10	10/5/66	Fuel oil	1,000
18*	11/5/61	Varsol	5,300
19*	11/5/61	Soap	10,600
23*	10/5/66	Gasoline	550
28*	11/5/61	Fuel oil	11,165
38*	8/5/74	Diesel	6,000
39*	10/5/66	Diesel	10,000
40*	10/5/66	Gasoline	6,000
41*	6/5/80	Gasoline	4,000
42*	10/5/66	Oil	550
44*	10/5/66	Unknown	1,000

Note: According to EDR data base records, each tank is identified as being permanently closed on February 12, 1988.  
\* A "Tank Removal Procedures" page prepared for this UST was provided in the 1991 Law report.

*Excerpt from Enviroans July 2007  
Environmental Site Assessment and Limited  
Compliance Review of Interface Fabrics Inc.  
304 East Main Street, Elkin, NC*

## Attachment 4

Phase I ESA - True Textiles Mill  
304 East Main Street, Elkin North Carolina  
Table 1 - Current and Former Building Use

Bldg #	Floor	Current Use	Former Use	Concerns
1	1	Storage and shipping	""	
1	2	Storage and shipping, recycling materials storage area	""	
1	3	Storage	""	
2	1	Inspections	""	
3	1	Drying Operations	""	
3	2	Vacant	Shipping/Storage	
3	3	Vacant	Shipping/Storage	
4	4	Latex Storage	Shipping	
5	1	Finishing, Latex coating, scotchguard, etc.	""	
6	1	Shipping and Receiving	""	
6	2	Storage of Fabric	""	
7	1	Warehousing	Warehousing/Intake from rail cars	
7	2	Warehousing	""	
7	3	Warehousing	""	
8	1	Finishing and Washing	Dyehouses/Dyeing operations	REC
8	1a	Vacant	Basement - Chemical mixing area	REC
8	2	Vacant	Chemical Storage	REC
9	1	Finishing / Universal Waste Stg	""	
9	2	Storage and Offices	Chenille	
9	3	Storage and Offices	Burling	
9	4	Storage and Offices	Sample/Storage	
10	1	Concrete Railroad Platform	Formerly Latex AST storage	
11	1	Oil Drum Storage for Piece Dyeing Operations	Finishing/Piece Dyeing Operations	
11	2	Vacant	Dye storage	
12	1	Vacant	Finishing/Piece Dyeing Operations	
12	2	Vacant	Maintenance Area, formerly drum storage with staining	
13	1	Vacant	Finishing/Piece Dyeing Operations	
14	1	Vacant	Finishing/Piece Dyeing Operations	
15	1	Vacant	Dyeing Operations	
15	2	Vacant	Storage	
16	1	Vacant	Former Finishing/Washing and Warehousing with pits for finishing operations	
17	1	Gym/Vacant	Former Printing Operations, Bank, Gym, Bowling Alley	REC
17	2	Offices/Vacant	Offices/Lab Testing	REC

Phase I ESA - True Textiles Mill  
304 East Main Street, Elkin North Carolina  
Table 1 - Current and Former Building Use

18	1	Offices	Former Printing Operations, Bank, Gym, Bowling Alley	
18	2	Offices	""	
18	3	Offices	""	
19	1	Warping Machine and Vacant	Weaving	
19	2	Vacant	Taslan/Spinning	
19	3	Vacant	Spinning/Carding	
20	1	Vacant	Training Center/Recreation Cabin	
21	1	Vacant	Dyehouse	
22	1	Vacant	Offices and Engineering	
22	2	Vacant	Blending	
23	1	Vacant	Machine Shop and Maintenance - Utilized Parts Washer	REC
23	2	Vacant	Taslan	REC
23	3	Vacant	Spinning/Carding	REC
24	1	Vacant	Training Center	
24	2	Vacant	Training Center	
24	3	Vacant	Training Center	
25	1	Vacant	Maintenance area	REC
25	1a	Vacant	Maintenance area	REC
26	1	Vacant	Maintenance	
26	2	Vacant	Maintenance	
26	3	Vacant	Warp Storage	
26	4	Vacant	Stockroom	
26	5	Vacant	Carding	
27	1	Water Treatment with Alum	""	
27	2	Water Treatment with Alum	""	
28	1	Boiler Storage	Boiler/Energy Conversion from Coal to Electric	
29	1	Used Oil AST for Machine Maintenance	Oil Storage and Warehousing	
29	1a	Natural gas boiler area	Dyehouse	REC
30	1	Boiler storage - Out of Use	Boiler storage - coal	
30	2	Boiler storage - Out of Use	Boiler storage - coal	
31	1	Vacant	Dyehouses and Dyeing Operations	REC
31	2	Vacant	Dye Storage, Lab	REC
32	1	Nylon extrusion	Nylon extrusion, Historically Utilized Tri-ethylene Glycol to Clean Excess Nylon from Metals	REC
32	2	Nylon extrusion	Nylon Extrusion	REC
32	3	Nylon extrusion	Nylon Extrusion	REC
33	1	Nylon extrusion	Nylon Extrusion	REC
34	1	Nylon extrusion	Nylon Extrusion	REC
35	1	Vacant	Warehousing	

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36	1	Vacant	Garnet	
37	1	Vacant	Garnet	
38	1	Vacant	Warehousing	
39	1	Offsite	Offsite	
40	1	Offsite	Offsite	
41	1	Offsite	Offsite	
42	1	Offsite	Offsite	
43	1	Offsite	Offsite	
44	1	Offsite	Offsite	
45	1	Offsite	Offsite	
46	1	Warping and candle storage	Warping	
47	1	Storage and warehousing	""	
Fly Ash		Out of use	Fly Ash disposal and settlement area	REC

## Attachment 5



Photograph 1: General overview of Area 1.



Photograph 2: General overview of Area 2.



Photograph 3: General overview of Area 3.



Photograph 4: General overview of Area 4.



Photograph 5: General overview of Area 5.



Photograph 6: General overview of Area 6.



Photograph 7: General overview of Area 7.



Photograph 8: General overview of Area 8, looking at a dry fly ash basin.



Photograph 9: General overview of Area 9.



Photograph 10: General overview of Building 20 within Area 9.



Photograph 11: Typical office area within the Site buildings.



Photograph 12: Typical textile processing within the Site buildings (i.e. washing, drying, and coating).



Photograph 13: Typical storage operations within the Site buildings.



Photograph 14: Nylon extrusion operations located on the Site.



Photograph 15: Warping operations on the Site.



Photograph 16: Alum and soda ash water treatment operations on the Site.



Photograph 17: Typical drum storage observed with active staining.



Photograph 18: Typical drum and tote storage observed on the Site.



Photograph 19: 20,000-gallon fuel oil AST located in Area 5.



Photograph 20: 500-gallon used oil AST within Building 29 of Area 5.



Photograph 21: 750-gallon Alum AST located in Area 5.



Photograph 22: Liquid nitrogen tank located in Area 6.



Photograph 23: Typical fuel oil AST for fire suppression operations located on the Site.



Photograph 24: Typical propane AST located on the Site.



Photograph 25: Intake pond from Little Elkin Creek located in Area 7.



Photograph 26: Equalization basin within Area 5.



Photograph 27: Out of use clarifier within Area 5.



Photograph 28: Water storage reservoir within Area 9.



Photograph 29: Typical floor drain with observed staining within the Site building.



Photograph 30: Floor drain and parts washer area within Building 23 with observed historic staining.



Photograph 31: Typical monitoring well located on the Site.



Photograph 32: Duke Energy substation located on the Site in Area 5.



Photograph 33: Typical transformers owned by True Textiles within the Site buildings.



Photograph 34: Dumpster storage located on the Site.



Photograph 35: Typical discarded mill waste within Areas 7 and 8.



Photograph 36: Fly ash disposal within Area 8.



Photograph 37: General view of the former machine shop/maintenance area with stained and pitted floors within Buildings 23.



Photograph 38: Typical staining within the boiler rooms of Area 5.



Photograph 39: General overview of a former dye house on the Site.



Photograph 40: Typical staining observed within a former dyeing pit.



Photograph 41: Typical staining observed within a former dyeing pit.



Photograph 42: General overview of the former chemical mixing area in the basement of Building 8.



Photograph 43: Typical staining within the former chemical mixing room.

Photograph 44: