



PAT MCCRORY  
*Governor*

DONALD R. VAN DER VART  
*Secretary*

MICHAEL SCOTT  
*Acting Director*

Via First Class Mail &  
Via Electronic Mail – [sem4@msn.com](mailto:sem4@msn.com)

April 11, 2016

Steven Myers, Fab Industries Corp  
c/o Mohican Mills, Inc.  
98 Cuttermill Road, Suite 421N  
Great Neck, New York 11021

Re: **Travis Knits, Inc.**  
1515 West Academy Street  
Cherryville, Gaston County, North Carolina  
NONCD0002787

Dear Mr. Myers:

The Inactive Hazardous Sites Branch (IHSB) of the North Carolina Division of Waste Management (Division) has received reports of assessment activities including the August 20, 2015 Phase II Environmental Site Assessment (ESA) by Blue Ridge Environmental Services, Inc., and the December 8, 2015 Sub-Slab/Indoor Air Assessment and March 15, 2016 Soil & Groundwater Assessment Report by Hart & Hickman, PC that indicate environmental media (soil, groundwater, and air) at the above referenced location have been contaminated by one or more hazardous substances. As a result of the contamination, the 1987 Inactive Hazardous Sites Response Act (IHSRA), codified under North Carolina General Statute (NCGS) § 130A-310, *et seq.*, and Title 15A of Subchapter 2L of the North Carolina Administrative Code (15A NCAC 2L) apply to the Travis Knits Site (or Site).

On January 19, 2016, the IHSB submitted a “Notice of Request for Remedial Investigation” to James (Jim) Sitterly of Mohican Mills, Inc. (Mohican Mills). The request stated that based on the reported concentrations of contaminants detected in the groundwater and the proximity of active water-supply wells and residential properties, the Division considers Travis Knits to be a high priority for assessment.

On February 18, 2016, we received correspondence from Susan Cooper of Womble Carlyle Sandridge & Rice, LLP (WCSR) responding to the IHSB’s January 19, 2016 Notice of Request for Remedial Investigation (RI) of Travis Knits, Inc. (Travis Knits). The letter states that WCSR represents Mohican Mills and Fab Industries Corp (its parent company), and, for reasons stated in the letter, Mohican Mills cannot commit to conduct a full investigation of the contamination at the Site.

We reviewed the information in the letter. Based on this review and correspondence and information within Division records, this is our understanding of the facts:

- 1) On November 11, 1970, Lemag, Inc. (Lemag) purchased a 10-acre parcel of land (subject property) at 1515 West Academy Street in Cherryville, Gaston County. On December 1, 1970, Lemag leased the property to Knitronic Knitting Mills, Inc. (Knitronic). In 1971, construction of the industrial and chemical storage structures was completed at the subject property.
- 2) On December 27, 1976, Knitronic and Harbor Knits merged, and on July 14, 1978, Knitronic changed its name to Travis Knits. On or about September 20, 1979, Fab Industries Corp (Fab Industries, f/k/a Fab Industries Trust, f/k/a Fab Industries, Inc.) purchased Travis Knits, and facility operations resumed at the subject property.
- 3) Travis Knits submitted a written request to the NCDAQ on October 18, 1979 to transfer the facility air permit (03489R) from Knitronic to Travis Knits (i.e., appears as the same entity). The permit granted permission for the operation of two tenter frames that processing prescoured fabrics and an air cleaning device that consisted of a carbon bed adsorber installed on the prescouring/dry cleaning system to remove hydrocarbon and odorous emissions.
- 4) Lemag and Travis Knits modify the subject property lease on December 17, 1979. On December 15, 1981, Mohican Mills (f/k/a Meyer Mills, Inc.), a principal subsidiary of Fab Industries, purchased the subject property from Lemag.
- 5) Correspondence on January 15, 2016 from Susan Cooper of WCSR to the IHSB confirmed the use of tetrachloroethene (PCE) in the facility operations. Randy Littlejohn recalled that PCE was used in washer equipment to clean yarn dye materials prior to his employment in March 1980. In addition, on November 20, 2015, Dawn Gottschalk reported that a PCE release occurred from a leaking tank at the subject property in the 1980s.
- 6) On September 4, 1991, Travis Knits purchased the subject property (approximately 10-acres) from Mohican Mills and the east adjacent parcel (approximately 4 ½-acres) from William & Marjorie Andrews. On September 29, 1992, Travis Knits acquired approximately 2 acres of the west adjacent parcel owned by Jakbee, Inc. Both Travis Knits and Mohican Mills continued as subsidiaries of Fab Industries.
- 7) NCDAQ directed Travis Knits to provide a facility-wide emissions inventory within one year of the issuance of the September 9, 1993 Air Quality Permit #3489R9. Trigon Engineering Consultants, Inc.'s (Trigon's) August 1994 Air Toxics Modeling of Travis Knits stated that "the Travis Knits 1993 Air Pollutant emissions report identified formaldehyde, acetic acid, xylene, perchloroethylene [a/k/a PCE], ethyl acetate, arsenic, beryllium, cadmium, hexavalent chromium, manganese, mercury, and nickel emissions from plant process and fuel combustion."
- 8) In 1994, Trigon reported the PCE air pollution by source included tenter frames, dyeing processes, and fugitive emissions. The May 25, 1995 Air Permit # 3489R10 for Travis Knits incorporated emission limitations on toxic air pollutants including PCE.
- 9) Facility operations at Travis Knits ceased on June 29, 2001, and on November 3, 2003, Travis Knits was merged into Mohican Mills (i.e., the two subsidiaries combined under the parent company, Fab Industries). SSJJJ Manufacturing, LLC (SSJJJ) signed an agreement to purchase assets of Fab Industries on May 26, 2005. Subsequently, Fab Industries created a liquidating trust, Fab Industries Trust, as a successor.

10) On November 1, 2005, Fab Industries filed a certificate of amendment to change its name to Fab Industries Corp. On November 2, 2005, Fab Industries Trust (the successor to Fab Industries) announced it had closed a definitive agreement for the sale of assets and assumption of liabilities to SSJJJ and that business operations would continue under the name Fab Industries Corp.

Thus Mohican Mills (having merged with Travis Knits) is the same and sole operator of the facility and that facility operations conducted by Mohican Mills (a/k/a Travis Knits, a/k/a Knitronics) is the only operator that could have caused or contributed to contamination of environmental media at the subject property. Based on these understandings, we believe that both Mohican Mills and Fab Industries have responsibilities pursuant to NCGS § 130A-310.7 of the IHSRA.

We appreciate your efforts to address the contamination through sampling of some water-supply wells within the immediate vicinity of the subject property. However, the Site has not been properly characterized and the lateral and vertical extent of contamination remains undefined. Further assessment activities are required to adequately investigate immediate exposure risks of contaminants from this Site. Moreover, to protect public health and the environment, the Division has the authority under § NCGS 130A-310.1(c) to order any responsible party to conduct such monitoring, testing, analyses and reporting as deemed reasonable and necessary to ascertain the nature and extent of any hazard posed by a site.

We request that you prepare a work plan that complies with the items outlined in our January 18, 2016 Notice of Request for Remedial Investigation. Please submit the work plan to us by May 26, 2016.

Your prompt attention to this matter is appropriate. If you have questions, need more information, or require additional time to complete this request, please contact me at (704) 663-1699 or Collin Day at (336) 776-9675.

Sincerely,

/s/ *George Adams*

George D. Adams, Engineer  
Division of Waste Management, NCDEQ

cc: James Sitterly  
Mohican Mills Inc.  
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Lincolnton, North Carolina 28092

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Samantha Dye, Gaston County Environmental Health  
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PAT MCCRORY  
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MICHAEL SCOTT  
*Acting Director*

**CERTIFIED MAIL**  
**Return Receipt Requested**

7015 1520 0002 8376 4658

April 11, 2016

Fab Industries Corp  
By and through its Registered Agent,  
William Sturges  
128 South Tryon Street  
Charlotte, North Carolina 28201

Re: **Travis Knits, Inc.**  
1515 West Academy Street  
Cherryville, Gaston County, North Carolina  
NONCD0002787

Dear Mr. Sturges:

The Inactive Hazardous Sites Branch (IHSB) of the North Carolina Division of Waste Management (Division) has received reports of assessment activities including the August 20, 2015 Phase II Environmental Site Assessment (ESA) by Blue Ridge Environmental Services, Inc., and the December 8, 2015 Sub-Slab/Indoor Air Assessment and March 15, 2016 Soil & Groundwater Assessment Report by Hart & Hickman, PC that indicate environmental media (soil, groundwater, and air) at the above referenced location have been contaminated by one or more hazardous substances. As a result of the contamination, the 1987 Inactive Hazardous Sites Response Act (IHSRA), codified under North Carolina General Statute (NCGS) § 130A-310, *et seq.*, and Title 15A of Subchapter 2L of the North Carolina Administrative Code (15A NCAC 2L) apply to the Travis Knits Site (or Site).

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/s/ *George Adams*

George D. Adams, Engineer  
Division of Waste Management, NCDEQ

cc: James Sitterly  
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