



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

John E. Skvarla, III
Secretary

CERTIFIED MAIL 7013 1090 0000 8848 1114

July 30, 2014

Mr. Christopher Cox
Hanesbrands Inc.
1000 East Hanes Mill Road
Winston Salem, NC 27105

Subject: **NOTICE OF REC PROGRAM ELIGIBILITY**
Former Hanesbrands Industrial Facility
700 South Stratford Road, Winston Salem, Forsyth County, NC
Site ID: NONCD0002945

Dear Mr. Cox:

The Inactive Hazardous Sites Branch (Branch) of the Superfund Section of the Division of Waste Management (Division) has received a receptor survey report and a vapor evaluation report for the subject site (Site) and determined that the Site could be cleaned up through the Branch's Registered Environmental Consultant (REC) Program without direct oversight by Branch staff.

At higher risk sites, the Division will directly oversee and approve testing and cleanup work conducted by responsible parties and owners. At sites the Division determines are not the highest risk, we have a privatized oversight program (the REC Program) to help expedite approval of voluntary party contaminant cleanup actions. The REC Program was established to remove a bottleneck for approval caused by limited state staff available for oversight of cleanup actions. The Division must apply its staff resources toward working on the highest risk sites first. The technical requirements are the same regardless of whether an REC or state staff oversee and approve the work.

For voluntary cleanup actions under the REC Program, the remediating party hires an REC, a firm that has been approved by the state to implement a cleanup and certify that the work is being performed in compliance with state regulations. In other words, the REC is authorized to provide oversight of the cleanup in place of the Division. Details regarding the REC Program can be found at <http://portal.ncdenr.org/web/wm/sf/ihs/recprogram>.

The advantages of participating in a voluntary assessment and/or cleanup under an agreement with the Division (with state staff or REC oversight) include: 1) removal of this Site from the NC Sites Priority List of inactive hazardous sites and 2) eligibility for a cap on cleanup costs a party is obligated to pay if that party enters into an agreement with the Division. The REC

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Program also has the advantage of an expedited cleanup process as the REC has the authority to certify completion of work phases without having to wait for state concurrence. Because the costs to clean up contaminated materials continue to increase and because uncontrolled contamination may move and expand over time, immediate action taken at your property now could help to reduce cleanup costs and may prevent future damage to adjacent properties. Of even more concern, uncontrolled migration of groundwater contamination can lead to potential exposure by contaminating drinking water wells in the area, discharging to the surface on other properties, and vapors from the contaminated groundwater entering homes and other structures.

Regardless of your plans for voluntary remedial action, if you have not already done so, you must take the immediate abatement actions to terminate and control the contaminant discharge, and mitigate any hazards resulting from exposure to the pollutants as required by state regulations under 15A NCAC 2L. Beyond these initial abatement actions, all assessment and remediation will be done through the Inactive Hazardous Sites Response Act.

In summary, to effectively manage limited Branch resources, staff are only assigned to higher priority sites which are not appropriate for assessment in the REC Program. No project manager will be assigned to your Site since you are directed to continue assessment and remediation in the REC Program. This letter also serves as a reminder that in order to receive approval for your assessment and remediation activities, you must be participating in the Branch's REC Program.

The procedures for entering into an REC-AA are attached. If you have any questions regarding these procedures or the REC Program, please contact the REC Program Manager, Kim Caulk, at (919) 707-8350 or visit the REC Program website at <http://portal.ncdenr.org/web/wm/sf/ih/recprogram>.

If you have questions about the status of the project within the Branch and the actions that apply to your Site, please contact me at (919) 707-8213 or qu.qi@ncdenr.gov.

Sincerely,



Qu Qi, PG, Central Region Supervisor
Division of Waste Management, NCDENR

Enclosure: REC-AA Procedures

cc: Stephen Berlin – Kilpatrick Townsend & Stockton, LLP