

Julia Ellen Crump Foundation, Inc.

4141 Parklake Ave., Suite 200

Raleigh, NC 27612

R. Daniel Boyce, Chairman

NARRATIVE INFORMATION SHEET

R04-24-C-011

RE: FY24 Brownfields Cleanup Grant Application

The Julia Ellen Crump Foundation, Inc. is pleased to submit this proposal for FY2024 Brownfields Cleanup funding. Below we provide the information requested.

1. Applicant Identification:

Julia Ellen Crump Foundation, Inc.
4141 Parklake Ave., Suite 200
Raleigh, North Carolina 27612

2. Funding Requested:

- (a) Grant Type: Site-specific Brownfield Cleanup
- (b) Federal Funds Requested: \$4,767,200

3. Location:

- (a) City: Wake Forest
- (b) County: Wake County
- (c) State: North Carolina

4. Property Information:

Former Burlington Mill WWTP Site
9601 Capital Blvd.
Wake Forest, North Carolina 27587
CT37183054220

5. Contacts:

- (a) Project Director/Project Manager:
Buddy Howard
4141 Parklake Ave., Suite 200, Raleigh, NC 27612
Ph: 919-876-8868
Email: buddy@equitresearch.com
- (b) Chief Executive/Highest Ranking Elected Official:
Dan Boyce, Chairman of the Board
4141 Parklake Ave., Suite 200, Raleigh, NC 27612
Ph: 919-653-7825
Email: dboyce@maynardnexsen.com

6. Population:

Wake Forest: 46,387
Tract 37183054220: 5,375

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7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The priority site(s) is in a federally designated flood plain.	1
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures.	2
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Letter from the State or Tribal Environmental Authority: A letter of acknowledgement from the North Carolina Department of Environmental Quality is attached.

9. Releasing Copies of Applications: Not Applicable

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1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

1.a. Target Area & Brownfields:

1.a.i. Overview of Brownfield Challenges & Description of Target Area:

Wake County and the Town of Wake Forest are situated at the center of the State in a region once a major hub for tobacco, cotton, and textile industries. Many of the small towns, like Wake Forest, began as commerce and rail centers for tobacco and cotton farming, when tobacco farmers migrated east to escape the “Granville wilt” crop disease in the Piedmont region of the state during the early 1900s. Bustling downtowns grew in these communities to serve the surrounding farms and growing populations. Tobacco farm production peaked in the 1950s, as North Carolina farmers produced over 840 million pounds until health concerns in the 1980s and 90s led to declining demand of tobacco products. Then, in 1998, the four largest US tobacco companies entered into a master settlement agreement with the state Attorneys General, and demand for tobacco dropped tremendously in the following years. North Carolina farmers produced only 184 million pounds of tobacco in 2020 (**78% less than peak production**)¹. Textile mills in the region also experienced a similar boom and bust cycle. Mills opened in many of the small towns to take advantage of the nearby raw materials, labor supply, and rail access; but, as global competition increased in the late 1990s and early 2000s, the industry collapsed.

Wake Forest’s story began in 1832 when the North Carolina Baptist Convention opened the Wake Forest Manual Labor Institute, later named Wake Forest College, on land purchased in the farm country of Wake County. Shortly thereafter, the Raleigh & Gaston Railroad established a depot close to the college in 1874. The depot spurred commercial development, and the college sold lots on the east side of the tracks for new stores and businesses. While the college moved to Winston-Salem in 1956, the local tobacco industry and textile mills helped the downtown persevere. However, in Wake County, employment in textile mills dropped from 1,222 in 1998 to only 136 in 2009 (an **89% decline**)². In 1996, Burlington Industries closed their textile plant in Wake Forest, laying off approximately 730 textile workers in a Town of only 8,156 residents at the time (1996). Located along the northern bank of the Neuse River, the mill building has been underutilized for storage, while approximately 30 acres of land between the building in the river, which includes the former wastewater treatment plant (WWTP), was parceled off and has sat vacant and unused for almost 30 years.

Across the region and throughout Wake County, communities are rapidly increasing in population, but the smaller communities continue to work with less staff capacity, resources, and capital investment – as much of the economic development is centralized in and around the City of Raleigh. Disproportional investments continue to steer towards Raleigh, due to its population and land size, but outlying towns such as Wake Forest continue to grapple with overwhelming population increases (49,657 residents in 2021 – 6 times the 1996 population), lack of recreational amenities, and increased costs of living. Although population growth is typically a successful economic metric, if former mill properties are not revitalized and redeveloped to their highest and best use, communities like Wake Forest are more susceptible to becoming bedroom communities, thus creating further barriers to employment, housing, education, medical facilities, and amenities. **Thus, census tract (CT) 37183054220 in the Town of Wake Forest is the target area for this brownfield cleanup project.** The cleanup and redevelopment of the WWTP target site for recreation and a transportation hub will be a catalyst for the redevelopment of the adjacent mill building and other adjacent properties into higher value uses, such as housing, office space, and retail establishments.

1.a.ii. Description of the Proposed Brownfield Site(s):

The WWTP consists of approximately 30 acres of grass land developed with 8 former wastewater treatment basins (approximately 4 acres). These ponds were used in the wastewater treatment process for the former Burlington Mill textile plant on the north adjacent property which

¹ USDA.gov. Accessed October 2023.

² US Census QWI Explorer <https://qwexplorer.ces.census.gov>. Accessed October 2023.

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has been inactive since 1996. A legacy pump station associated with the former Burlington Mill plant still exists in the Neuse River, bordering the target site to the south and an associated pipe connecting the pump station to the former plant traverses the site north to south. An active CSX railroad borders the target site to the west, and US Highway 1 is the eastern border. The WWTP is zoned highway business (HB), and the target site is currently unused and vacant. The southern half of the property (approximately 17 acres) is in the Neuse River floodplain. The former WWTP ponds remain on the target site, and they have hindered any attempt at property redevelopment for decades.

Historic textile mill wastewater treatment operations occurred between approximately 1950, when the mill opened, until 1996, when it ceased operation. The WWTP has remained dormant since then. In an effort to close the WWTP ponds, property owners and the NCDEQ have collected samples, and the presence of per- and polyfluoroalkyl substances (PFAS) and perfluorooctanoic acid (PFOA) have been reported in the associated water (~8 million gallons) and sludge (~16,000 cubic yards) remaining. The ponds are uncontrolled, and some are located in the floodplain, posing a risk of releases to the Neuse River during heavy rain or flooding events. The target site is the gateway to the Town of Wake Forest from the south along US Highway 1, and not being able to close the ponds has resulted in the delayed redevelopment of the site and surrounding properties.

1.b. Revitalization of the Target Area:

1.b.i. Reuse Strategy & Alignment with Revitalization Plans:

In May 2023, Wake Forest adopted the Wake Forest Community Plan³, which established a vision where the Town will “continue to prosper as a highly desirable community that preserves its small-town charm while fostering new growth opportunities. Smart, sustainable growth strategies will guide future development, with an enhanced focus on **preserving open space, maintaining a lush tree canopy, and ensuring sufficient infrastructure is in place.**” The plan was developed with significant community input, including a Community Advisory Panel, business focus groups, 21 individual stakeholder interviews, an Open House Series where a total of 245 community members attended, and a cover story that was included in the July/August edition of Wake Forest’s *Our Town Newsletter* (mailed to every home in the target area zip code). The variety of outreach activities ensured we reached all stakeholders, including those in our underserved communities. The events provided residents, business owners, and other stakeholders the opportunity to share their thoughts and opinions on Wake Forest’s long-term vision, vitality, and sustainability as captured in the draft Community Plan and Future Land Use Map.

The plan identified the target site as a potential gateway for the Town of Wake Forest, which can offer a mix of commercial, recreational, and transit-oriented development. The S-Line is a rail corridor that is being considered for local commuter rail service and regional intercity passenger rail service along the planned Southeast High-Speed Rail Corridor. The corridor has the opportunity to introduce new passenger rail service to the existing freight corridor.⁴ Direct access to the S-Line with stations in Wake Forest could open significant opportunities for the Town in terms of land use, economic development, and tourism. Tourism combined with more business-related travelers in the area can have a positive local effect on economic development. Our target site, the former Burlington Mill WWTP property, has been specifically called out in the *NCDOT S-Line Study – Wake Forest Playbook* as a potential location for an S-Line transit station and a key property in this transformation of Wake Forest.

Specifically, the target site has been envisioned as recreational open space in the floodplain, offering an opportunity to preserve existing open space and tree canopies. Creating an attractive public recreational space here will support the transit hub area by making it a destination that serves nearby residents, provides connections to the regional greenway system along the Neuse River, and connects to residents in Raleigh south and west of the river. The park provides space to place

³ Wake Forest Community Plan – May 2023. <https://online.flippingbook.com/view/711346792/26/>

⁴ NCDOT S-Line TOD Study Final Report, July 2023

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multiple features to attract and entertain users. The Julie Ellen Crump Foundation focuses on improving the lives of families and children. We took ownership of the site to promote the cleanup, since it also coincides with our mission to support children and families through education. The proposed open space and proximity to the river allows for the development of an educational walking trail to teach and educate young people and the community about the natural environment, stormwater processes, environmental contamination, and river habit. The northern acreage outside of the floodplain can be redeveloped into the transit station and Transit-Oriented Development (TOD) with a mix of commercial, retail, and residential uses surrounding it. The target site provides an opportunity to create new jobs and investment opportunities in area neglected for almost 30 years.

1.b.ii. Outcomes & Benefits of Reuse Strategy:

In its current state, the target site is unsafe and not suitable for the planned redevelopment and causes a negative blighting effect on neighboring properties. The benefits of the site include: 1) remediation of over 8 million gallons of contaminated water, 2) proper removal and disposal of over 16,000 cubic yards of contaminated sludge and sediments, and 3) the mitigation of threats of releases to the Neuse River and exposure to downriver properties. The eventual redevelopment of the target site will restore and preserve approximately 17 acres of open space to create a regional park, which will connect with local greenways, provide access to river, offer kayak and canoe launches, and other amenities. The outdoor recreation facilities and trails will be a regional destination that takes advantage of views and access to the Neuse River, allowing for outdoor and environmental education opportunities for children and families. The development and connection of the greenway trail system to the surrounding area will also add additional health and wellness benefits to the community. Maintaining the open space also provides opportunities for creating nature-based solutions to mitigate flooding and improve climate resiliency, by providing a natural buffer to protect adjoining commercial and residential development and investments.

The upper 13 acres will eventually be redeveloped for parking and facilities for the park, a potential transit station, and a TOD with a mix of commercial, retail, and residential surrounding the transit station, attracting over \$50 million in investment and hundreds of construction jobs. The TOD study outlines a number of benefits of TOD around a commuter transit station. It includes a mix of housing, office space, retail, civic spaces, and neighborhood amenities within walking distance of the hub. The broad range of health, environmental, and economic benefits are enhanced by more choices of transportation, reduction in the need for excess driving, and preserves natural areas by developing more compact, walkable communities. “Successful TOD also improves quality of life for all people, regardless of age, ability, race, gender, income, and background. When implemented with thoughtful supporting strategies, mobility hubs and associated TOD can provide affordable and equitable access to opportunity for all kinds of communities.”

As part of the solicitation for a remediation contractor, the Foundation will include evaluation criteria for contractors to propose green remediation practices, such as reducing operating and idle times of trucks being loaded with sludge for disposal transportation.

1.c. Strategy for Leveraging Resources:

1.c.i. Resources Needed for Site Characterization:

A number of site assessment activities have already occurred at the target site since its closure in 1996. However, an existing EPA Community-wide Brownfield Assessment Grant administered by the Central Pines Regional Council (CPRC), formerly known as the Triangle J Council of Governments, has funds available for any additional assessment needed to clarify contaminants, characterize waste, or satisfy requirements of the North Carolina Department of Environmental Quality (NCDEQ). Wake Forest is one of the target areas for CPRC’s grant, and the Town has identified this as a priority site. With the funds available and the Site Eligibility Determination (SED) approved by EPA Region 4, any additional site characterization can be completed by June 15, 2024. Funds from that grant have already been used to help plan for site cleanup. The community-wide grant period ends in 2026 and overlaps with this proposed cleanup grant period.

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1.c.ii. Resources Needed for Site Remediation:

The Crump Foundation is seeking funding from this EPA cleanup grant to complete the necessary tasks required for the planned WWTP remediation and closure. The requested amount is sufficient to complete the remediation to NCDEQ’s requirements for the proposed reuse. In coalition with the Piedmont Triad Regional Council (PTRC), the CPRC also manages an EPA Cleanup Revolving Loan Fund (RLF) for the region. If additional cleanup funding is required, the Crump Foundation would consider applying for a loan from the RLF.

1.c.iii. Resources Needed for Site Reuse:

The Town of Wake Forest recognizes the value of this prominent location and is committed to partnering with the property owners to explore public private partnerships to achieve the goals of a mixed-use development that may accommodate future commuter rail, rehabilitate and reuse the site and adjacent former Burlington Mill structure, prohibit new industrial uses, and restore and preserve open space along the Neuse River. The Town is discussing one day taking over the area in the floodplain to improve and maintain a park, once the remediation is complete.

With the potential of a transit station and the Town’s community plan identify the area as a gateway, interest in the area surrounding the target site is already growing. For example, a local development team intends to purchase nearby property north of the target site and invest approximately \$80 million in a mixed-use development to include office, retail, restaurant, and the potential for workforce housing, to start. As the target site is remediated, we anticipate significant increases in development activity in the target area.

Resources Needed for Site Characterization, Remediation, and Reuse

Name of Resource	Is the Resource for (1.c.i.) Assessment, (1.c.ii.) Remediation, or (1.c.iii.) Reuse Activities?	Is the Resource Secured or Unsecured?	Additional Detailed or Information About the Resource
CPRC EPA Community-wide Assessment Grant	1.c.i. Assessment	Secured	WWTP site is already approved for assessments by EPA Region 4.
PTRC/CPRC EPA RLF	1.c.ii Remediation	Available Unsecured	Property owners are eligible to apply for a loan.
Town of Wake Forest	1.c.iii Reuse Activities	Unsecured	Town is committed to public/private partnerships to achieve the TOD plan goals and is discussing park ownership and maintenance.
Local Developers	1.c.iii Reuse Activities	Unsecured	Local developers intend to purchase nearby property and interested in public/private partnerships for the multi-modal transportation hub.

1.c.iv. Use of Existing Infrastructure:

As a former industrial site, sufficient existing water, sewer, and electrical utilities exist at the site to be reused for the proposed redevelopment. Public/private partnerships will be responsible for financing and construction of site upgrades (greenways, launches, amenities) according to the open space/park plans. NCDOT and/or Federal DOT will be responsible for funding the S-Line Station construction. No additional infrastructure is anticipated to be needed.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:

2.a. Community Need:

2.a.i. The Community’s Need for Funding:

As a non-profit organization, the Crump Foundation relies on a family trust and small donations to complete our mission. Funds are extremely limited, and 100% of the funds we do disperse annually go to support children and family charities. There are no funds available for site cleanup and remediation. While very supportive of the project, Wake Forest continues to experience population increases, but largely in the outlying residential neighborhoods, putting additional strain

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on the Towns’ infrastructure and staffing. This growth has been uneven, however, with a much larger percentage of residential growth than non-residential growth, resulting in a much smaller amount of tax revenue. As the following table shows, the target area census tract lags the Town and County demographic indicators in several categories. For example, the target area’s median household income and per capita income are 8% and 10% less, respectively, compared to the Town’s. The median home value in the target area is 15% less compared to the Town’s. The target area has a small population and lower income residents, which limits their ability to solve brownfield challenges on their own.

Demographic Data (ACS 2021 5-year estimates⁵)	Census Tract 37183054220	Wake Forest	Wake County
Total Population	5,375	46,387	1,112,883
Median Household Income	\$103,380	\$112,397	\$110,390
Per Capita Income	\$39,354	\$43,601	\$45,425
Median Home Value	\$277,400	\$328,200	\$324,500
% Under 5 years of age	7.0%	7.8%	6.0%
% Over 62 years of age	16.0%	14.0%	14.9%

2.a.ii. Threats to Sensitive Populations:

2.a.ii(1) Health or Welfare of Sensitive Populations:

According to EPA’s EJScreen Mapping Tool for the target area census tract (371083054220)⁶, the demographic index (a combination of percent low-income and percent minority) is in the 51st percentile of the US. The data shows that the child population (less than 5 years old), a population that is particularly sensitive to environmental contamination, is in the 68th percentile nationally and 70th percentile in the state. The older population (over 64) is in the 32nd percentile in North Carolina and in the 34th percentile in the U.S. Older people are also more susceptible to conditions caused by environmental contaminants. The Low Income Population is in the 35th percentile for the State and 45th for the nation. The health and welfare of the area was adversely impacted by the closing of the Mill in 1996 – jobs were eliminated, and with the site remaining vacant and unused, the risks of exposure due to lingering environmental contamination still exist. Residents near the site can be exposed to these dangerous constituents through a variety of ways. The main constituent of concern (COC) is PFAS in the former WWTP ponds. PFAS is an emerging contaminant that is still being studied by both the EPA and NCDEQ as to the full extent of the threat to sensitive populations. Exposure to PFAS is widespread with a broad range of PFAS being detected in the environment, wildlife, and humans (PFAS have been detected in human blood worldwide), drastically increasing the potential for adverse effects to sensitive populations. The full extent of exposure consequences is still not known. EPA and 23 states have established drinking water screening action levels in the parts per trillion (ppt; nanograms/liter) range. Trespassers (homeless, explorers, and those trying to access the river) could be exposed to lingering contaminants. The target site cleanup will prevent further exposure of the sensitive population (low-income, children, and elderly) to the identified site contaminants through the removal of PFAS surface water and pond sludge source material, allowing for the development of the park, where children and families can learn, play, and relax, and TOD, which will create economic opportunities, jobs, and transit options.

2.a.ii(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions:

The 2020 Wake County Human Services Public Health Report for Chronic Disease (latest available) revealed that cancer ranks as the number one cause of death in Wake County, with tracheal/bronchial/lung cancers identified as the leading cause of cancer-related deaths. Heart disease ranks as the second cause of death, and research involving humans suggests that high levels of certain PFAS may lead to increased cholesterol levels and increased risk of high blood pressure. Because PFAS is an emerging contaminant and still so much is unknown, research is still ongoing to determine the health effects and links to cancer. However, a study funded by the UCSF EaRTH Center

⁵ Census Bureau website – Accessed November 2023

⁶ EJSCREEN Community Report, Tract 37183054220 – Accessed November 2023

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and the UCSF Helen Diller Family Comprehensive Cancer Center found significant PFAS exposures in women with cancer. The study suggests PFAS may be playing a role in cancers of the breast, ovary, skin and uterus.⁷ As the following table shows, Wake County (town level data unavailable) has a higher incidence rate of each of those cancers.

National Cancer Institute State Cancer Profiles⁸ Age-Adjusted Incidence Rate cases per 100,000	Wake County	North Caroli na	U.S.
Incidence Rate of Breast Cancer	147.4	132.6	127.0
Incidence Rate of Ovary Cancer	9.5	9.4	10.1
Incidence Rate of Melanoma of the Skin	25.7	25.7	22.5
Incidence Rate of Uterus Cancer	29.2	25.8	27.4
Incidence Rate of All Cancer Sites	453.9	464.4	442.3

Furthermore, Wake County, which includes the target area, experiences a greater rate of birth defects compared to the state, and exposures to PFAS have been linked to low birth weights and birth defects.

Birth Defects⁹	Wake County	North Carolina
Rate per 1,000 live births	40.8	33.7

Cleaning up the ponds will eliminate and prevent further exposure to the contaminated water and sludge. The redevelopment of the target site will help improve health outcomes by providing a recreational area in which residents of the target areas can exercise and improve their heart health.

2.a.ii(3) Environmental Justice:

2.a.ii(3)(a) Identification of Environmental Justice Issues

Due to the industrial past uses of the Site, the surrounding area disproportionately shared the negative environmental consequences of the industrial operations, and now the sensitive populations in the southern area of the Town continue to disproportionately share the negative environmental legacy of the site. The site and census tract area are not located in a disadvantaged tract according to CEJST. However, according to the EPA’s EJ Indexes (combines data on low income and people of color populations), the target area has elevated levels of Particulate Matter: 67th percentile in the State and 62nd percentile nationally (PFAS can be dispersed through the air); Ozone: 62nd percentile in the State and 59th percentile nationally; Diesel Particulate Matter: 65th percentile in the State and 54th percentile nationally; Air Toxics Cancer Risk: 60th percentile in the State and 70th percentile nationally; and Toxic Releases to Air: 61st percentile in the State and 62nd percentile nationally. As the percentiles show, sensitive populations in the target area are at more risk of exposure to wind-blown contaminants or contaminated site runoff. Compared to the Town and the County, the target area is an underserved area that has been ignored for almost 30 years.

2.a.ii(3)(b) Advancing Environmental Justice

Site cleanup under this project will remove site contamination that in turn will help to prevent additional transport and exposure of contaminants to sensitive populations in the area. Further, site redevelopment will provide learning opportunities and a recreational area for the community and the region. The addition of the transit station and TOD on the northern portion will provide an economic boost for the area, provide transit options, increase job opportunities, raise property values, and improve the quality of life. Thus, the cleanup and eventual redevelopment of the target site will help reverse the disproportionate impacts and advance environmental justice in the community. The target site is currently vacant and, therefore, will not cause the displacement of residents or current businesses.

2.b. Community Engagement:

⁷ <https://www.ucsf.edu/news/2023/09/426136/study-finds-significant-chemical-exposures-women-cancer>

⁸ National Cancer Institute. <https://statecancerprofiles.cancer.gov/index.html>. Accessed October 2023.

⁹ NC State Center for Health Statistics. <https://schs.dph.ncdhhs.gov/data/bd/data.htm>. Accessed October 2023

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2.b.i. Project Involvement & 2.b.ii. Project Roles:

Name of organization	Point of contact (name, email & phone)	Specific involvement in the project or assistance provided
Wake Forest Community Council	Angela Bendorf Jamison, Chair angela@communicopiapr.com 919-827-1689	Comprised of area civic, service, social, fraternal, religious and business organizations, as well as interested individuals, the council will engage the community through their respective organizations and provide input on site reuse.
Wake Forest Chamber of Commerce	Liz Simperts, President liz@wakeforestchamber.org 919-609-6777	The Chamber will participate in community meetings and support outreach activities. The chamber will serve as a voice of and a conduit to businesses during project activities.
Wake Forest Downtown, Inc.	Dave Lucey, Chair Dave@page158books.com 919-435-9415	Non-profit focused on revitalizing the Town. Will participate in community meetings and support outreach activities.
NCDOT – Local Liaison	Grady McCollum, PE gamccollum@ncdot.gov 919-707-4683	TOD Study representative that will participate in community meetings.

2.b.iii. Incorporating Community Input:

In support of this cleanup project, the Crump Foundation will continue to build upon the community input gathered and received during the development of the *Wake Forest Community Plan* and the NCDOT S-Line Study. The Foundation will communicate progress, disseminate information, and invite community participation during this cleanup project. As part of this grant application, the Crump Foundation posted a legal notice in the *Raleigh News & Observer* on October 29, 2023, asking for feedback and inviting the community to a public meeting on November 7, 2023, at the Joyner Park Community Center in Wake Forest. Topics of discussion were the Analysis of Brownfield Cleanup Alternatives (ABCA), an outline of the proposed cleanup project, and how the WWTP Site is described as a catalyst site for redevelopment as a recreational area and TOD hub along the proposed S-Line.

At the start of the project, the Crump Foundation will prepare a Community Engagement Plan to guide community engagement efforts. The plan will include hosting a series of community meetings, which will include virtual options to accommodate those that cannot attend for health or other reasons. The meetings will be held before key project milestones, including at the project kickoff, prior to site work commencing, and after site work is completed. In support of these efforts, we will prepare outreach and promotional materials to be distributed at meetings, via mail or email, newspapers, and the Town’s and CPRC’s website. The Foundation will also provide project updates to be included in the Town’s newsletter. All outreach materials will include contact information for the project team for residents or stakeholders to provide input on the project. All comments received will be documented, carefully considered, and a response will be provided in a timely manner. The Foundation will also establish an information repository both online and at the local library to house all project documentation for residents and stakeholders to access, as needed.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS:

3.a. Proposed Cleanup Plan:

The NCDEQ Raleigh Regional Office of the Division of Water Resources (RRO) have directed the National Pollutant Discharge Elimination System (NPDES) permit and ponds at the target site to be closed. In trying to comply with the directive, emerging contaminant PFAS and PFOA impacts to the 8 wastewater treatment ponds have been fully documented and need remedial action in order to fulfill the redevelopment vision for the target site and surrounding area. While no federal or state regulations exist to guide cleanup, the selected cleanup alternative has been developed to remove PFAS from surface water in the ponds for disposal at an appropriate facility and to excavate and dispose of the remaining pond sludges. Approximately 8,070,000 gallons of surface water and 16,000 cubic yards (CYD) of sludge material are remaining in the ponds. A number of PFAS cleanup technologies exist in the marketplace. These include foam fractionation, PFAS adsorption products,

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and coagulation techniques. The bench scale test conducted at the target site for a foam fractionation method proved to be successful. An ABCA was drafted and recommended the use of foam fractionation to remove PFAS/PFOA from the approximately 8,070,000 gallons of surface water prior to approved effluent discharge. Subsequent to wastewater treatment and disposal, ABCA recommended removing the 16,000 CYD of sludge material from the ponds, dry in batches on-site, and transport the remaining material to an approved disposal facility. Once the ponds are clear of water and sludge, the target site will be backfilled and/or graded as necessary. This recommended option eliminates the PFAS source materials and returns the site back to a more natural state in order to proceed with the development plan.

3.b. Description of Tasks/Activities & Outputs:

3.b.i. Project Implementation, ii. Project Schedule, iii. Task/Activity Lead, & iv. Outputs:

The Crump Foundation, along with project partners, is prepared to complete the following tasks within the proposed four-year grant period.

Task 1: Project Management
i. The Crump Foundation Project Manager, with support from our project partner, CPRC, will oversee the grant management and compliance with EPA grant terms and conditions. They will ensure tasks are completed efficiently and will be responsible for the procurement and oversight of the Qualified Environmental Professional (QEP). They will procure and oversee the brownfields cleanup contractor; and report on project activities and accomplishments to stakeholders. The Project Manager will meet monthly with the project team, EPA, and NCDEQ. With assistance from the QEP, they will complete EPA quarterly reports, Federal Financial Report (FFR) and Disadvantaged Business Enterprise (DBE) utilization forms, and ACRES database entries/updates. It is anticipated that Crump Foundation staff will also attend national and regional training workshops relevant to brownfields redevelopment. At the end of the project, with assistance from the QEP, they will draft a Final Performance Report to document accomplishments and lessons learned.
ii. Schedule: October 1, 2024 – September 30, 2028; monthly meetings, quarterly reporting
iii. Task/Activity Lead: Project Manager with the assistance of project partner and QEP
iv. Outputs: 48 Project Team Meetings; 16 Quarterly Reports; 4 FFR and DBE forms; regular ACRES updates; 1 Final Performance Report
Task 2: Community Outreach
i. The Crump Foundation Project Manager will lead the community outreach efforts with support from the project team (QEP, CPRC staff, and NCDOT Liaison). Specific tasks include the development of a Community Engagement Plan (CEP), conducting stakeholder meetings at key milestones of the project, distributing project information to the community, establishing an information repository available for review by the public, and preparing and distributing outreach materials as necessary.
ii. Schedule: October 1, 2024 – September 30, 2028; CEP and Info Repository in 1 st quarter; meetings anticipated in 1 st , 5 th , 9 th , 12 th , and 16 th quarters; outreach materials at least quarterly.
iii. Task/Activity Lead: Crump Foundation Project Manager with support from the project team
iv. Outputs: 1 CEP, 5 outreach meetings at key milestones, 6 outreach materials, 1 information repository
Task 3: Cleanup Planning
i. With oversight from the Crump Foundation Project Manager, the QEP and designated contractors will be responsible for finalizing the ABCA (including a 30-day comment period) and preparing and submitting all applicable planning, permitting and engineering documents required for site cleanup. Additionally, they will develop a Quality Assurance Project Plan (QAPP) for necessary confirmation sampling activities as well as a site Health and Safety Plan (HASP). The QEP will be responsible for developing and helping evaluate requests for proposals (RFPs) to complete the proposed cleanup. Site surveying is also included in this task in order to support the development of Cleanup/Closure Plans, backfilling activities, and necessary engineering documents.
ii. Schedule: October 1, 2024 – September 30, 2026; ABCA, QAPP, HASP in 1 st quarter; bid docs in 2 nd quarter; plans, permits, and engineering 4 th quarter.

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iii. Task/Activity Lead: QEP with oversight from Crump Foundation Project Manager
iv. Outputs: 1 Final ABCA, Closure/Cleanup Plans, Engineering Plans, Site Surveys, 1 QAPP, 1 HASP, Contractor bid documents
Task 4: Site Cleanup
i. Approximately 92% of the budget will be dedicated to site cleanup activities. Site cleanup activities will begin by selecting appropriately skilled and trained environmental cleanup contractors to execute the cleanup/closure scope of work (SOW). Cleanup tasks include PFAS removal and disposal of approximately 8,070,000 gallons of wastewater, removal and disposal of approximately 16,000 CYD of sludge, and any necessary remedial sampling activities.
ii. Schedule: October 1, 2025 – September 30, 2028; cleanup starts in 5 th quarter, complete by 12 th quarter
iii. Task/Activity Lead: QEP with oversight from Crump Foundation Project Manager
iv. Outputs: Site closure and/or Certificate of Completion

3.c. Cost Estimates:

The total cost of project activities (\$4,767,200) is summarized in the following Budget Table and cost estimates for each task follows.

Budget Categories		Task 1	Task 2	Task 3	Task 4	Total
		Project Management	Community Outreach	Cleanup Planning	Site Cleanup	
Direct Costs	Personnel					
	Fringe					
	Travel	\$ 8,000				\$ 8,000
	Equipment					
	Supplies					
	Contractual	\$ 48,600	\$ 14,250	\$216,250	\$ 82,000	\$ 361,100
	Construction				\$4,398,100	\$4,398,100
	Other					
Total Direct		\$ 56,600	\$ 14,250	\$216,250	\$4,480,100	\$4,767,200
Indirect						
Total		\$ 56,600	\$ 14,250	\$216,250	\$4,480,100	\$4,767,200

TASK 1: PROJECT MANAGEMENT – Total \$56,600

Personnel: In-Kind from the Crump Foundation Project Manager

Travel: 2 Crump Foundation board members to attend 2 regional workshops (2x2x\$500/person) for training; 2 board members to attend 2 national conferences (2x2x\$1,500/person) = **\$8,000**

Contractual: 48 project team meetings (48x\$450); 16 Quarterly Reports (16x\$900); 4 Annual Reports (4x\$225); 1 final summary report (\$9,000); ACRES updates (6x\$450) = **\$48,600**

TASK 2: COMMUNITY OUTREACH – Total \$14,250

Personnel: In-Kind from the Crump Foundation Project Manager

Supplies: In-Kind from the Crump Foundation

Contractual: 1 CEP (\$3,250); 1 Info Repository (\$500); 5 Outreach meetings (5x\$1,500); 6 project outreach materials (6x\$500) = **\$14,250**

TASK 3: CLEANUP PLANNING – Total \$216,250

Personnel: In-Kind from the Crump Foundation Project Manager

Contractual: 1 Final ABCA (\$5,000); Planning/Permitting/Engineering documents (avg. \$225/hr x est. 600 hrs); Site QAPP (\$7,500); HASP (\$2,000); Contractor bid documents (avg. \$225/hr x est. 160 hrs); Site survey (avg. daily rate \$2,050 x 15 days) = **\$216,250**

TASK 4: SITE CLEANUP – Total \$4,480,100:

Personnel: In-Kind from the Crump Foundation Project Manager

Contractual: QEP oversight (avg. daily rate \$2,050 x 40 days) = **\$82,000**

Construction: PFAS removal, disposal, oversight (8,070,000 gal @ \$0.20014/gal = \$1,615,100); Sludge removal, disposal, oversight (16,000 cyd @ \$169.875/cyd = \$2,718,000) (both estimates

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based on quotes from potential remediation contractors); Necessary confirmation sampling (avg. \$225/hr x 135 hrs = \$30,375 + labs @ \$34,625 = \$65,000) = **\$4,398,100**

3.d. Plan to Measure and Evaluate Environmental Progress and Results:

The project team will meet monthly to track the project's progress in fulfilling the scope of work, goals, and objectives. Each Quarterly Report submitted to EPA will include an update of project expenditures and will track activities and expenses against the project's schedule. If needed, corrective actions will be taken to ensure the project remains on schedule, within budget, and completed well within the four-year period of performance. Specific performance metrics detailed in the Work Plan will be used to summarize project accomplishments, and the project team will review and ensure that all reporting requirements are being met timely and the project continues to comply with all terms and conditions of the grant. Additionally, site-specific information will be routinely entered and tracked in ACRES. At a minimum, the outputs to be tracked include the number of public meetings, meetings with community groups, cleanup report, final ABCA; and, the outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:

4.a. Programmatic Capability:

4.a.i. Organizational Structure & 4.a.ii. Description of Key Staff:

The Julia Ellen Crump Foundation has the ability to effectively manage and oversee this brownfield grant and all phases of the remediation work. Dan Boyce, Chairman of the Julia Ellen Crump Foundation, will oversee the project activities and support the Project Manager. Mr. Boyce has been intimately involved with the Foundation and its management since its inception and is an accomplished trial attorney with almost four decades of experience representing clients in a number of civil, criminal and regulatory matters across a broad spectrum of industries. Buddy Howard, a member of the Foundation Board, is an MBA and Chartered Financial Analyst, having been involved in financial analysis and financial management for his entire 44-year career. Mr. Howard will serve as the Project Manager, oversee the QEP and contracts, manage the financial operations of the Foundation and the disbursement of funds. Mr. Howard served on the Board of the National Eating Disorders Association, a nonprofit with a budget of roughly \$3 million, from 2008 to 2013 and served as Treasurer for part of that time. The Central Pines Regional Council (CPRC) is currently administering an EPA Community-wide Brownfield Assessment Grant (BF-02D32122-0) where assessment and planning activities have been approved for the target site. CPRC and their Brownfield Project Manager, Ms. Lindsay Whitson, Community and Economic Development Director, have agreed to partner with the Crump Foundation to help in the administration of this Cleanup Grant. Additionally, the CPRC and PTRC are coalition partners on a cross regional EPA Brownfield Cleanup RLF. Ms. Whitson is the representative from CPRC to that coalition and has experience with the cleanup grant process. Finally, Frost, LLC, an accounting firm, who has been working with the Crump Foundation for over 20 years will assist with financial aspects of the award.

4.a.iii. Acquiring Additional Resources:

The Crump Foundation recognizes the extremely technical nature of this project and plans to hire an experience brownfields consultant, as their Qualified Environmental Professional (QEP), and licensed, experienced contractors to assist in completing project tasks. The Crump Foundation will procure consultants and contractors in full compliance with state and federal guidelines, 2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500. The Foundation will take proactive steps to send the solicitations to local firms and businesses in the target area and encourage them to apply or seek subcontracting opportunities. The solicitations will include the Davis-Bacon requirements to ensure all workers receive the appropriate wages.

4.b. Past Performance & Accomplishments:

4.b.iii. Never Received Any Type of Federal or Non-Federal Assistance Agreements

The Julia Ellen Crump Foundation, Inc. has never received nor managed any type of federal or non-federal assistance agreements or grants.

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1. Applicant Eligibility:

- a. The Julia Ellen Crump Foundation (Crump Foundation) is a non-profit organization, tax exempt under Section 501(c)(3) of the IRS Code. Further documentation is attached.
- b. Not applicable

2. Previously Awarded Cleanup Grants:

Crump Foundation affirms that it has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds:

Crump Foundation affirms that it does not currently have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership:

The approximately 30-acre former Burlington Mill Wastewater Treatment Plant (WWTP) property (Site) is owned by the Crump Foundation and was transferred on November 9, 2023.

5. Basic Site Information:

- a. Former Burlington Mill Wastewater Treatment Plant (WWTP)
- b. 9601 Capital Blvd., Wake Forest, NC 27587

6. Status and History of Contamination at the Site:

- a. The Site is contaminated by hazardous substances.
- b. The Site consists of approximately 30 acres of grass land developed with eight (8) former wastewater basins that were used in the wastewater treatment process for the former Burlington Mill textile finishing plant on the north adjacent property which operated between 1950 and 1996. There are no current users of the Site other than a small kayak rental company who accesses the Neuse River at the southernmost portion of the property.
- c. Through sampling, the presence of per-and polyfluoroalkyl substances (PFAS) and /or perfluorooctanoic acid (PFOA) have been reported in the associated water and sludge remaining in the ponds.
- d. Historic textile mill wastewater treatment operations occurred on the Site between approximately 1950 and 1996. PFAS and/or PFOA were identified in the ponds during a site investigation in November of 2020 in preparation to prepare a WWTP Closure Plan for the Raleigh Regional Office (RRO) of the North Carolina Department of Environmental Quality (NCDEQ) Division of Water Resources. Follow up sampling in February 2023 verified the presence of PFAS/PFOA.

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7. Brownfields Site Definition:

The Crump Foundation affirms the following:

- a. The Site is not listed or proposed for listing on the National Priorities List.
- b. The Site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA
- c. The Site is not subject to the jurisdiction, custody, or control of the U.S. Government.

8. Environmental Assessment Required for Cleanup Grant Applications:

A number of assessments have been conducted at the Site beginning as early as 1998. The Crump Foundation believes that sufficient assessment has been completed in order to proceed with cleanup and closure of the WWTP ponds as required by RRO of the NCDEQ. The following is a summary of reports reviewed or provided to the Crump Foundation:

- A Phase II report of the Subject Property and the adjacent Former Burlington Mill Textile facility to the north of the Subject Property dated November 1, 1999, prepared by Cooper Environmental; note: PFAS/PFOA were not contaminants of concern at this time.
- A Comprehensive Site Assessment Report (August 31, 1998) prepared by Dunklee and Dunham.
- Laboratory reports from November 2020 reporting PFAS in water samples collected.
- Laboratory report dated May 6, 2021 from sampling efforts from the ponds in April 2021 reporting concentrations of PFAS/PFOA.
- Laboratory Reports from the sampling efforts of RRO of NCDEQ in February 2023. PFAS was confirmed in ponds on the Site.

The Central Pines Regional Council (CPRC, formerly Triangle J Regional COG) currently has an EPA Community-wide Brownfields Assessment Grant (Cooperative Agreement BF-02D32122-0). One of the focus areas of this assessment grant is the Town of Wake Forest. The WWTP site was one of the first projects approved for funding and was granted site eligibility by EPA Region 4 for assessment, site characterization, and remediation planning. The grant period ends in 2026 and will overlap with this proposed cleanup grant period. Any additional site characterization needed can be completed by June 15, 2024 using these grant funds.

9. Site Characterization:

The Division of Water Resources (DWR) and Brownfields Redevelopment Section (BRS) of NCDEQ have affirmed that site characterization has been completed for the removal of water and sludge from the ponds at the site. Should the Crump Foundation wish to amend the remedial alternative to include sludge management in place, additional assessment will be needed and understands that it will be completed by June 15, 2024. A copy of the letter is attached.

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10. Enforcement or Other Actions:

The Site was reissued a National Pollutant Discharge Elimination System (NPDES) Permit (NC0001376) in March 2010 that expired in February 2012. A Notice of Violation (NOV) of the NPDES Permit from the RRO was issued for the Site in October 2023. The property owners have been working with the RRO trying to close the site and the permit for a number of years and no enforcement actions have been taken. The Crump Foundation is not aware of any additional inquiries or orders from federal, state, or local government entities on the subject property and is not aware of any enforcement actions against the Site.

11. Sites Requiring a Property-Specific Determination:

The Site does not require a property-specific determination. However, working through a Community-wide Brownfield Assessment Cooperative Agreement (No. BF-02D32122-0), a Site Eligibility Determination (SED) was approved by EPA Region 4.

12. Threshold Criteria Related to CERCLA/Petroleum Liability:

EPA followed the Region 4 Brownfield Grant SED Outline and approved the site eligibility on December 1, 2022. A copy of the approval is attached.

(a) Property Ownership Eligibility – Hazardous Substances Sites

iii. LANDOWNER LIABILITY PROTECTIONS FROM CERCLA §107 Liability

(1) Bona Fide Prospective Purchaser Liability Protection

The Crump Foundation is NOT potentially liable for contamination at the site under CERCLA §107. The Crump Foundation acquired the site on November 9, 2023, after performing an AAI compliant Phase I ESA dated September 15, 2023. The Crump Foundation meets the definition of a Bona Fide Prospective Purchaser for the Site. The Crump Foundation did not own or operate the facility at the time of disposal of a hazardous substance, has never arranged for the treatment or disposal of hazardous substances at the site, nor has accepted hazardous substances for transport for disposal or treatment at the site. The Crump Foundation has limited the potential for exposure by securing the site only allowing access to potentially hazardous areas to qualified professionals.

a. Information on the Property Acquisition

i) The Crump Foundation took ownership of the property from the previous property owners, River Place V, LLC via property transfer.

ii) November 9, 2023

iii) The Crump Foundation holds fee simple title to the property. No other entities own the Site.

iv) The Site was acquired from River Place V, LLC.

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- v) There is a familial connection between River Place V, LLC and the Julia Ellen Crump Foundation, Inc. Please see the attached explanation on Page 7.
- b. Pre-Purchase Inquiry
 - i) An AAI compliant (ASTM 1527-21) Phase I ESA and sufficient site assessments were completed. These assessments were conducted between 1998 and September 2023.
 - ii) The AAI compliant (ASTM 1527-13) Phase I ESA was completed by Stantec Consulting Services, Inc. (Stantec). Stantec staff were fully qualified to complete the Phase I ESA and met the definition of the Environmental Professional (E.P.) as defined by the standard.
 - iii) The Phase I was dated September 15, 2023, and the Site acquisition occurred on November 9, 2023.
- c. Timing and/or Contribution Toward Hazardous Substances Disposal

The site formerly contained the WWTP for the Burlington Mill textile plant located to the north. The mill and WWTP ceased operations in 1996. The Crump Foundation is not responsible for the current state of the site or the presence of hazardous substances. The Crump Foundation also affirms that at no time have we arranged for the disposal of hazardous substances on the site or transported hazardous substances to the site.
- d. Post-Acquisition Uses

There are no current users of the Subject Property other than a small kayak rental company who accesses the Neuse River at the southernmost portion of the property. The kayak rental company is located outside of the fenced area of the ponds.
- e. Continuing Obligations
 - i) No on-going releases of hazardous substances were discovered on the site, and the Crump Foundation took every reasonable step to stop any known releases.
 - ii) The Crump Foundation took all reasonable steps to prevent any future releases by securing the site and only allowing qualified personnel to enter the site.
 - iii) In order to prevent and/or limit exposure to remaining potential contaminants, the Crump Foundation has taken measures to secure the site only allowing qualified personnel to enter the site. The public in general and site users do not have access to the ponds.

The Crump Foundation confirms and affirms its commitment to:

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- i) Comply with all land-use restrictions and not impede the effectiveness or integrity of any institutional controls.
- ii) Assist and cooperate with those performing the cleanup and provide access to the property.
- iii) Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property.
- iv) Provide all legally required notices.

13. Cleanup Authority and Oversight Structure

- a. The Subject Property is not currently enrolled the NCDEQ Brownfields Program. However, the site is overseen by the NCDEQ Raleigh Regional Office of the Division of Water Resources (RRO). They have directed the site and current NPDES permit to be closed and will provide primary oversight for this project. The property owners and other stakeholders have been in regular contact with the RRO in the progress of site cleanup leading to closure. As of now, the property owners do not anticipate entering into a Brownfield Agreement (BFA) with the NCDEQ.

Additionally, work plans and cleanup activities conducted throughout the implementation of this project will be prepared/overseen by qualified Professional Geologists and/or Professional Engineers licensed in the state of North Carolina.

While the site is not currently enrolled in the NCDEQ Brownfields Program (NCBP), NCBP personnel are working with EPA Region 4 to administer EPA grant funds in the state. The Crump Foundation intends to follow best practices, guidelines, and direction from the NCBP in case the site should enter into a Brownfield Agreement (BFA) in the future.

The Crump Foundation will seek the technical expertise of a brownfield/environmental consultant to manage, oversee, and complete the cleanup activities at the site property. The Crump Foundation will hire this contractor(s) through a competitive process in accordance with the procurement provisions of 2 CFR 200, EPA's rule at 2 CFR 1500, the state of North Carolina, and our own procurement requirements.

- b. It is unlikely that impact has occurred on adjacent properties. During cleanup activities, The Crump Foundation will monitor the property boundaries in order to ensure no off-site migration of potential contaminants.

14. Community Notification

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- a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA)
A copy of the Draft ABCA is attached. Cleanup alternatives and a recommended solution were presented in the public meeting held on November 7, 2023.
- b. Community Notification Ad
The Crump Foundation placed a Legal Notice in the *Raleigh News & Observer* on October 29, 2023, to provide the community with notice of its intent to apply for cleanup grant funding. A copy of the notice is attached.
- c. Public Meeting
A public input meeting was held in the Town of Wake Forest at the Joyner Park Community Center to discuss the brownfield cleanup grant application and ABCA. The findings of the ABCA were presented and community members were able to ask questions regarding the ABCA, the cleanup project at the Site, and the grant application. Other than general discussion, no specific comments were received from the public during the meeting or via any other communication method advertised regarding the brownfield project at the site.
- d. Submission of Community Notification Documents
The following are attached (unless otherwise noted):
 - Copy of the Draft Analysis of Brownfield Cleanup Alternatives (ABCA) – Revision 01, Stantec Consulting Services, Inc. (Stantec), November 10, 2023
 - Copy of the Legal Notice in the *Raleigh News & Observer* from October 29, 2023
 - Meeting notes from the November 7, 2023, community input session.
 - A copy of the public meeting sign-in sheet
 - In a phone call with stakeholders on November 8, 2023 and during the public comment period prior to the submission of this Cleanup Grant application, NCDEQ Division of Water Resources (DWR) and Brownfield Redevelopment Section (BRS) staff made a significant comment regarding the original alternative selected. They were concerned that based on current site characterization and conditions, the WWTP Closure Plan may not have been approved. After discussion and further evaluation, even with a higher cost to implement, an alternative that removed surface water and pond sludges from the site was evaluated to be more appropriate. The comment was addressed and the Draft ABCA revised accordingly.

15. Named Contractors and Subrecipients

Contractors: Not applicable

Subrecipients: Not applicable

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12. (a) iii (1) a. v) – Familial Relationship Additional Information

Burlington Industries, Inc. (Burlington I) built and operated the Wake Forest NC Plant up through the late 1990s to manufacture fabric that may have been treated with PFAS and other chemicals. Burlington Mill used a series of finishing ponds on the 30-acre WWTP parcel as part of their manufacturing process and was the only responsible party for PFAS or any other chemicals later found in the ponds. The Company filed bankruptcy and the plant and the ponds were decommissioned in approximately 1996.

In approximately 1999, a group of real estate developers through River Place, LLC bought the entire Burlington Mill properties (approximately 126 acres) which included the 30 acre WWTP parcel. An initial transfer of the 30 acre parcel was made from Burlington Mill to River Place IV, LLC in or around 1999. Gene Boyce was not in the original group but later became a minority owner and passive investor in the River Place limited liability companies. River Place IV was later divided out and the approximately 30 acres where the ponds are located became River Place V, LLC. Again, these ponds have not been used since the late 1990's. The property has remained undeveloped through the present day. In approximately 2008, due to their personal financial distress, the remaining owners of River Place V, LLC withdrew from ownership of the numerous River Place limited liability companies. Gene Boyce, who did not cause the environmental conditions that exist today and who is an innocent owner under CERCLA law was the "last man standing" in each of the River Place LLCs including the 30-acre WWTP parcel.

Since 2008/2009, Gene Boyce as the former minority owner/last man standing has asserted he is an "innocent owner" for Superfund Liability Protection. He did not operate any type of business or facility on the property and the ponds have remained in a decommissioned state. From 2017 to 2022 efforts were made to rescind the permit and seek closure of the lagoons/ponds under state and federal law. Efforts to sell or transfer the properties were unsuccessful. All efforts to obtain state or federal government assistance with remediation were ignored until November 2022. On November 4, 2024 a meeting was held with state and local officials and a plan finally was developed to seek state or federal funding for remediation and assistance in obtaining a permit from NCDEQ to acquire funding and complete the closure and remediation of the ponds. A local plan for the re-use of the 30 acre parcel including a town park and commercial and residential development was presented by the Town of Wake Forest and Wake Forest acknowledged a willingness to accept a donation of the lower acreage for use as a Town Park.

In 2023: Gene Boyce offered to transfer ownership of River Place V, LLC to the Crump Foundation, a 501(c)(3) nonprofit as part of the remediation and redevelopment effort. The Crump Foundation had been established by Julia Ellen Crump's estate and has made contributions to numerous children's charities and foundations for over two decades. The Crump Foundation unanimously agreed to accept the donation of the property. Dan Boyce has been chairman of the Crump Foundation for at least two decades and he arranged for the

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transfer of ownership (in fee simple) in November 2023 as a donation from River Place V, LLC. Dan Boyce has had no ownership interest in River Place V, LLC while serving as Chairman of Board of the nonprofit Crump Foundation. Dan Boyce has taken no salary or other compensation as the Chairman and member of the Board of Directors of the Crump Foundation.



NORTH CAROLINA
Environmental Quality

ROY COOPER

Governor

ELIZABETH S. BISER

Secretary

MICHAEL SCOTT

Director

November 8, 2023

Mr. Dan Boyce
Foundation Board Chairman
Julia Ellen Crump Foundation, Inc.
Mr. Dan Boyce, Foundation Board Chairman
4141 Parklake Rd., Suite 200
Raleigh, NC 27612
dboyce@maynardnexsen.com

Subject: River Place V LLC
NPDES Permit No. NC0001376
Wake County / Raleigh Regional Office

Dear Mr. Boyce:

The North Carolina Department of Environmental Quality, Brownfields Redevelopment Section (DEQ BRS) acknowledges that the Julia Ellen Crump Foundation, Inc. (Crump Foundation), plans to conduct the cleanup of a brownfield site and is applying for an FY24 EPA Brownfields Cleanup Grant.

The Crump Foundation has developed an application requesting site-specific federal Brownfields Cleanup funding for Burlington Mills Waste Water Treatment Plant (WWTP) located at 9601 Capital Boulevard, Wake Forest, NC 27587 (Site).

DEQ BRS affirms that the Burlington Mill WWTP site:

- i. Is eligible to be enrolled in the North Carolina Brownfields Redevelopment Section's voluntary response program, pending submittal and detailed review of an application in accordance with our statutory obligations;
- ii. Is not currently enrolled in the North Carolina Brownfields Redevelopment Section's voluntary response program;
- iii. Per information provided by the North Carolina Division of Water Resources, the current regulating entity for closure of this waste water treatment plant, there is a sufficient level of site characterization from the environmental site assessments performed to date for remediation work to begin on the site, assuming the remedy proposed is removal of material. If the remedy selected includes management of material in place, additional assessment will be needed to sufficiently characterize the site(s) for the remediation work to begin. We understand there will be a sufficient level of site characterization from the environmental site assessment performed by June 15, 2024, for the remediation work to begin on the site.



North Carolina Department of Environmental Quality | Division of Waste Management
217 West Jones Street | 1646 Mail Service Center | Raleigh, North Carolina 27699-1646
919.707.8200

We hope that the the Crump Foundation is successfully awarded this grant, but we will continue to support you in your efforts toward closure of the Burlington Mills WWTP whether a grant is awarded or not. We truly believe successful Brownfields projects can rejuvenate a community. For any questions regarding this letter, please contact Ms. Joselyn Harriger at 980-297-4623 or joselyn.harriger@deq.nc.gov or Mr. Michael Montebello at 919-707-3624 or michael.montebello@deq.nc.gov .

Sincerely,



Ms. Joselyn Harriger
NC DEQ
Division of Waste Management
Brownfields Redevelopment Section

DocuSigned by:



C464531431644FE...

Mr. Michael Montebello
NC DEQ
Division of Water Resources
NPDES Permitting Branch