

May 15, 2026

Mr. Jason Freeman
Gateway Development Corporation
920 Florence Boulevard
Florence, Alabama 35630

Re: Supplemental Phase II Letter
Former Southern Felt Site Property
206 Davidson Street
Clinton, South Carolina
EnviroSouth Job No. 4013

Dear Mr. Freeman:

EnviroSouth, Inc. is pleased to provide you with this Supplemental Phase II Letter for the above-referenced property in Clinton, South Carolina.

Please call if you have any questions.

Sincerely,

EnviroSouth, Inc.



Keigan K. Mennetti, P.E.
Environmental Engineer
S.C. License No. 40996

attachments

INTRODUCTION

This letter was prepared to propose an estimated path on the delineation and management of existing contamination at the Former Southern Felt Site property located at 206 Davidson Street, Clinton, South Carolina. Please understand that the information in this letter was formed from the currently limited information available for the site and is subject to change depending on the results of further site delineation.

EnviroSouth completed a Phase II Environmental Site Assessment Report on May 14, 2026 and reviewed a previous 2022 Expanded Pre-CERCLA Screening Report prepared by the South Carolina Department of Environmental Services (SCDES). Both scopes of work included analysis of soil and groundwater collected from various locations throughout the property.

The reports indicated that the concentrations of one (1) or more metals and polycyclic aromatic hydrocarbons (PAHs) in certain soil samples exceeded acceptable U.S. EPA Regional Screening Levels (RSLs) for unrestricted use. The mean concentrations of many metals in naturally occurring soils in the South Carolina Piedmont are significantly higher than regulatory screening levels, and the metals detected during the Phase II ESA investigation are likely the result of naturally occurring conditions.

The groundwater results from the 2026 Phase II Environmental Site Assessment Report indicated that beryllium (a metal) was detected in one (1) temporary well at a concentration above the corresponding SCDES maximum contaminant level (MCL) for drinking water. Additionally, cobalt (a metal) and chloroform (a VOC) were detected in various temporary wells at concentrations above the corresponding U.S. EPA Tapwater RSLs but below the SCDES MCLs (in the case of chloroform where both limits have been established). It is likely that the detected concentrations of metals are the result of naturally-occurring suspended sediments in the groundwater samples and not indicative of a significant environmental concern at the site.

Based on the soil and groundwater results to date, a vapor intrusion condition is not likely to exist at the subject property.

REMEDATION

Remediation Plans – General

- The site has been partially characterized per the findings of the Phase II Environmental Site Assessment Report and the 2022 Expanded Pre-CERCLA Screening Report prepared by the SCDES. Soils in the area of the PAH soil contamination will need to be further evaluated to determine the full horizontal and vertical extent of the contamination associated with these compounds.
- The current plan for soils impacted by PAHs identified during past and future investigations will be to excavate to the extent possible, containerize, further characterize via analyses to determine hazardous properties, then properly dispose in accordance with regulatory requirements. Following removal of the soils, the excavated areas will be filled with clean soils.
- Groundwater is not used, and should not be used, as a source of drinking water or irrigation purposes at the property. All temporary wells associated with the previous investigations have been properly abandoned in accordance with the South Carolina Well Standards and Regulations

Additional Soil Sampling

Further evaluation of soil quality on the property in the areas of identified soil PAH contamination is necessary to fully delineate the vertical and horizontal extent of the contamination on the site. Soil borings should be installed to an approximate depth just above the water table at each location. This will be performed by a South Carolina licensed driller as required by State regulations.

The soil borings will be installed with a direct-push sampling rig equipped with 2-inch diameter macrocore sampling tools. All soil sampling equipment will be thoroughly decontaminated with a blend of water, isopropyl alcohol, and Alconox and then rinsed with deionized water prior to and between uses. The macrocores will be collected in clean single-use 5-feet long clear plastic tubes. Following core collection, the sample tubes will be sealed on each end with clean plastic caps and the depth of each end marked on the outside of the tube. At the discretion of the environmental professional, a decontaminated hand auger may be used to collect select soil samples. All penetrations of paving related to all media samples will be patched with similar materials (concrete or

asphalt) and finished as smooth and even surfaces.

Following sample collection, all soil borings will be properly abandoned by filling with bentonite grout.

Soil laboratory data will be compared to the U.S. EPA Screening Levels for Residential Soil (RSL-R) and Industrial Soil (RSL-I).

Estimated Cost: \$20,000 - \$40,000 (the range for this is somewhat large because the total will be dependent on actual number of samples and field days necessary to fully delineate the site)

Soil Remedial Activities

Soil Excavation

The proposed soil removal activities will be completed in areas of documented soil contamination from polycyclic aromatic hydrocarbons identified during the previous investigations and any future delineation activities.

Contaminated soils will be removed in the identified areas by utilizing an excavator to dig out the soils. The soils will be placed into a lined roll-off container. After the roll-off is filled, a composite soil sample will be collected and submitted for laboratory characterization via TCLP analyses of VOCs, SVOCs, PCBs, and metals to determine hazardous properties.

If the soils are determined to be non-hazardous, they will be transported for disposal by a licensed transporter under manifest controls to a nearby landfill such as WCI Anderson Regional Landfill. In the unlikely event that the soils are determined to be hazardous, they will be transported and disposed of by a licensed subcontractor equipped to handle hazardous material in accordance with regulatory requirements. Prior to exiting the property, care will be taken to prevent tracking onto nearby roadways. Transportation manifests and landfill weigh ticket records will be preserved and maintained to provide verification of the proper disposal of the soils.

To confirm that contaminated soils are no longer present at levels of regulatory concern, two (2) confirmatory soil samples will be collected from the base of each excavation area and submitted to a South Carolina certified laboratory for analysis of contaminants identified in that area during previous

investigations (SVOCs by EPA Method 8270). Following soil excavation, removal, and confirmation of contaminated soil removal, the excavated area will be backfilled with clean compacted fill dirt.

Estimated Cost: \$140 to \$460 per ton of contaminated soil dependent on the levels of contamination of each individual roll-off sampled for disposal to be excavated (with a minimum of approximately \$15,000 for the mobilization, planning, laboratory, disposal, and equipment cost in the event only one [1] roll-off container of contaminated soil is necessary).

Soil Encapsulation

Alternatively, the purchaser can enter into a non-responsible party voluntary cleanup contract (NRP-VCC), also known as a Brownfields contract, with the SCDES prior to closing on the property. The NRP-VCC would eliminate the risk of the new owner potentially being considered as a responsible party for existing subsurface contamination and remedial activities would likely not be necessary. Instead, corrective action would consist of ensuring the property is safe for its planned future usage and would consist of engineered controls such as soil encapsulation by exposure barriers.

The exposure barriers would consist of building floor slabs, concrete (4-inch minimum thickness), asphalt pavement (2-inch minimum thickness), and soil barriers in landscaped areas.

Soil barriers in landscaped areas beyond paved areas would consist of a minimum of one (1) feet of clean fill imported from off-site locations. The fill would overlay a visible demarcation barrier (e.g., impenetrable geotextile fabric) that separates the clean soil from the underlying chemically impacted on-site soil. The purpose of the visible demarcation barrier is to provide a visible warning to those conducting future intrusive activities (i.e. – utility repairs) below the vertical limit of the Engineering Control.

The exposure barriers including building floor slabs, concrete, or asphalt pavement in parking areas and sidewalks, and soil barriers in landscaped areas would be maintained in good condition. The property manager typically observes the exposure barriers weekly. Any maintenance issues would need to be addressed immediately to ensure that these barriers to human exposure are constantly maintained. In landscaped areas, planting activities will be restricted to the top ten (10) inches of soil. Workers will need to be made aware of the potential soil hazards and personal protective equipment

will be used to prevent direct exposure of the soil to the workers. Once site engineered controls have been completed, a Stewardship Plan outlining site all engineered controls would be prepared as well.

The cost of soil encapsulation is typically dependent on planned site development and included in those costs.