

Julia Ellen Crump Foundation, Inc.

4141 Parklake Ave., Suite 200

Raleigh, NC 27612

R. Daniel Boyce, Chairman

INFORMATION SHEET**RE: FY2026 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. (Crump Foundation)
4141 Parklake Ave., Suite 200
Raleigh, North Carolina 27612

2. Website URL:

The Crump Foundation does not have a registered website address or domain name.

3. Funding Requested:

- (a) Grant Type: Single Site Cleanup
- (b) Federal Funds Requested: \$4,000,000

4. Location:

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

5. Property Information:

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

6. 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

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7. Population:

Wake Forest: 48,047

Census Tract 37183054220: 5,877

8. Other Factors:

Other Factors	Page #
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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 proposed site(s) is in a federally designated flood plain.	1
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	2,3
The target area(s) is impacted by a coal-fired power plant has recently closed (2015 or later) or is closing.	

9. Releasing Copies of Applications: Not Applicable

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:**Target Area & Brownfields**

1.a. Overview of Brownfield Challenges & Description of Target Area: Wake County and the Town of Wake Forest are situated at the center of North Carolina, to the north of the City of Raleigh, in a region that was once a major hub for tobacco, cotton, and textile industries. Many of the small towns in the county like Wake Forest began as commerce and rail centers for tobacco and cotton farming during the early 1900s. Textile mills opened in the county 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. In Wake County, employment in textile mills dropped from 1,222 in 1998 to only 136 in 2009 (an **89% decline**)¹. 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). Once an economic engine for the Town of Wake Forest, the loss of mill jobs impacted the surrounding businesses, resulting in the closure of many stores, gas stations, drycleaners, and other businesses that depended on the mill workers. The 65-acre mill property sat vacant for years in a blighted condition along US Hwy 1, the southern gateway into the town, a constant reminder of the loss of good jobs and prosperity that the town once enjoyed and environmental legacy of potential contamination from the historic mill operations. In 2013, the mill property was divided and the northern 35 acres and the mill building were sold to become a self-storage facility, and the southern 30 acres, which includes the mill's former wastewater treatment plant (WWTP), continued to sit vacant and unused for almost 30 years. Nestled on the northern bank of the Neuse River, the 30-acre WWTP site was historically impacted from the industrial discharges of the mill operations. The 30-acre Burlington Mill Wastewater Treatment Plant (WWTP) is the target site for cleanup under this brownfield grant. **The site is located in census tract (CT) 37183054220, the Target Area for this brownfield cleanup project, in the Town of Wake Forest.** The Julia Ellen Crump Foundation, the applicant and a nonprofit organization that focuses on improving the lives of families and children, took ownership of the site in 2023 to facilitate its cleanup and redevelopment for benefit of our community.

The greater Raleigh metropolitan area, which includes the Town of Wake Forest, is now experiencing rapid, sustained population growth. From 2020 to 2024, the metro area's population increased by an estimated 11%. Despite the rapidly increasing population, the smaller communities, like Wake Forest, 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 (56,764 residents in 2025 – nearly 10 times the 1990 population) and a lack of accompanying resources. The population growth presents many challenges for the town, including 1) balancing the pressure the rapid housing expansion puts on greenspaces, 2) providing sufficient recreational amenities and river access for residents and visitors, and 3) providing commercial economic development opportunities. However, this brownfields cleanup grant presents a unique opportunity to help solve those problems by remediating and redeveloping the brownfield site to create a recreational asset that will provide residents with access to the nearby Neuse River combined with a mixed-use commercial and residential on a portion of the site to create new economic opportunities, jobs, and housing options for the growing population. As the North Carolina Department of Environmental Quality (NCDEQ) expresses in their attached support letter, “We hope that the Crump Foundation is successfully awarded this grant, and we will continue to support you in your efforts...**We truly believe successful brownfields projects can rejuvenate a community.**”

1.b. Description of the Proposed Brownfield Site(s): The Burlington Mill WWTP property (9601 Capital Blvd, Wake Forest, NC), the target site for this cleanup, now consists of approximately 30 acres of mostly wooded land with the only structures being 8 former wastewater treatment basins, covering approximately 4 additional acres. These basins were used in the wastewater treatment process for the former Burlington Mill textile plant on the north adjacent property which operated from 1950 to 1996; the wastewater basins were also operated during these years. Prior to the development of the wastewater treatment basins, the site was undeveloped and no former site

¹ US Census QWI Explorer <https://qwexplorer.ces.census.gov>. Accessed October 2024.

operations took place on the site. A legacy pump station associated with the former Burlington Mill plant still exists in the adjoining Neuse River, bordering the target site to the south. 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 site is zoned highway business (HB) and is currently unused and vacant. The southern half of the property (approximately 17 acres) is in the Neuse River floodplain. The former WWTP basins and the unaddressed onsite contamination have hindered any attempt at property redevelopment for decades.

Since operations ceased, the WWTP has remained dormant but filled with water and sludge. In an effort to close the WWTP ponds, property owners and the NCDEQ have collected samples. The presence of per-and polyfluoroalkyl substances (PFAS) and perfluorooctanoic acid (PFOA) have been reported in the associated remaining 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. Trespassers crossing the property to access the Neuse River are at risk of exposures to contaminated media. The target site is the gateway to the Town of Wake Forest from the south along US Highway 1, and the inability to properly close the ponds has resulted in the delayed redevelopment of the site and surrounding properties.

Revitalization of the Target Area:

1.c. Reuse Strategy & Alignment with Revitalization Plans: The target site has been envisioned as recreational open space in the 17-acre portion of the site within the floodplain, offering an opportunity to preserve existing open space and tree canopies. No structures will be built within the floodplain and improvements (paths, trails, etc.) will be designed to withstand occasional inundation. Creating an attractive public recreational space here will serve nearby residents, provide connections to the regional greenway system along the Neuse River, and connect residents in Raleigh south and west of the river. The Julia Ellen Crump Foundation focuses on improving the lives of families and children. 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 habitat. The remainder of the site, the northern 13 acres outside of the floodplain, will be redeveloped into a mix of commercial, retail, and residential uses. Modeled after a nearby proposed development, the plan envisions four buildings: three residential with retail for a total of 200 residential units and 15,000 ft² of retail space for neighborhood-scale businesses, restaurants, coffee shops, and outfitters, and one 20,000 ft² office building so residents can live, work, and play within the target area. The plan complements and leverages proposed redevelopments and a planned commuter rail station on northern adjacent properties. The funding provided by this grant will provide a catalyst opportunity to clean up a blighted property that has been neglected for 30 years to provide recreational opportunities for residents and visitors while also stimulating local economic growth and creating new jobs and investment opportunities in the target area.

In August 2024, Wake Forest updated the Wake Forest Community Plan², which established a vision where the Town will foster new growth opportunities 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 plan identified the target site as a potential gateway for the Town of Wake Forest, which can offer **a mix of recreational, commercial, and residential development.** The *2022-2027 Town of Wake Forest Strategic Plan* included goals, which directly align with the planned mixed-use redevelopment on the site, such as goal #2 of “creating accessible housing opportunities” and #4 of “advancing community and economic prosperity.”³

² Wake Forest Community Plan – August 2024. <https://online.flippingbook.com/view/423237186/4/>

³ 2022-2027 Town of Wake Forest Strategic Plan: https://www.wakeforestnc.gov/sites/default/files/uploads/strategic-plan/2022/brochure_strategic_plan.pdf

1.d. Outcomes & Benefits of Reuse Strategy: In its current state, the target site is unsafe for environmental and human health reasons and thus not suitable for the redevelopment until the necessary cleanup actions are completed. Located in a suburban community, the site also causes a negative blighting effect on neighboring properties; this area has experienced disinvestment of new buildings and residences due to the presence of the abandoned WWTP. The environmental and health benefits of the site cleanup include the mitigation of potential exposure to contaminants to the target area residents and visitors and the mitigation of threats of releases to the Neuse River and exposure to downriver properties. In addition this brownfield cleanup grant will benefit the health and wellness of the community by facilitating the redevelopment of the target site to restore and preserve approximately 17 acres of open space to create a regional park, which will connect with local greenways, provide access to the river, offer kayak and canoe launches, and other amenities where target area residents and visitors can enjoy the outdoors, exercise in a natural environment away from traffic and suburban sprawl, and live a healthier lifestyle. The outdoor recreation facilities and trails will be a regional destination that takes advantage of views and access to the Neuse River, also allowing for outdoor and environmental education opportunities for children and families. The redevelopment of the northern 13 acres will include parking and restroom facilities to serve the park and a mix-use development of commercial, retail, and residential that will stimulate economic development in the target area and Wake Forest. Based on a similar proposed development in Wake Forest⁴, the mixed-use plan will create 200 new, energy-efficient apartments, retail, and office space, while attracting over \$60 million in investment and creating over 250 temporary construction jobs and 95-100 permanent jobs. The redevelopment of the entire target site will include nature-based solutions, such as restoring the riparian zone along the river with native vegetation to reduce erosion and stabilize soils and incorporating bioswales for stormwater management to improve water retention and increase local resiliency to the impacts of extreme weather events such as flooding.

Strategy for Leveraging Resources

1.e. Resources Needed for Site Characterization: As detailed in the threshold criteria section, a number of site assessment activities have already occurred at the target site since its closure in 1996 to sufficiently characterize the site and prepare for cleanup. However, should further characterization of the target site be needed, Julia Ellen Crump Foundation plans to use the existing EPA Community-wide Brownfield Assessment Grant awarded to the Foundation's partner, Central Pines Regional Council (CPRC), formerly known as the Triangle J Council of Governments. This grant has funds available for any additional assessment needed to clarify contaminants, characterize waste, or satisfy requirements of the NCDEQ to ensure comprehensive cleanup.

1.f. Resources Needed for Site Remediation: The EPA grant funding requested in this Cleanup Grant application is sufficient to complete all required tasks for the planned WWTP remediation and closure to NCDEQ's requirements for the proposed reuse. As detailed in the Analysis of Brownfield Cleanup Alternatives (ABCA), the cleanup costs are known and a contingency is included in the budget for potential unexpected expenses. With the Piedmont Triad Regional Council (PTRC), the CPRC also manages an EPA Revolving Loan Fund (RLF) for the region, which has provided a \$15,000 subgrant to optimize or "fine tune" the PFAS treatment process parameters for the complete destruction of the long chain and short chain PFAS compounds found in the target site's pond water. This will provide the parameters specific to the site's contaminants to ensure an efficient and effective process for the remediation of the target site under the brownfield cleanup grant. If additional cleanup funding is required, the Crump Foundation would consider applying for a loan from the RLF.

1.g. Resources Needed for Site Reuse: The Town of Wake Forest recognizes the value of this prominent location and is committed to partnering with the Crump Foundation to explore public private partnerships to achieve the goals of a mixed-use development that will rehabilitate and use the site, prohibit new industrial uses to prevent any potential future contamination, and restore and preserve open space along the Neuse River. The Town has committed to accepting the area in the floodplain as a donation from the Crump Foundation to improve and maintain as a recreational park, once remediation is complete. Once funding from this grant enables the site

⁴ Triangle Business Journal. <https://www.bizjournals.com/triangle/news/2023/06/13/wake-forest-aps-retail-office-capitol-commercial.html>

cleanup, the Crump Foundation will actively seek a private development partner for the planned mixed-use development on the 13-acre portion of the site.

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 Details 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 Secured	\$15,000 subgrant awarded to the Foundation to optimize PFAS treatment process parameters (letter attached). Additional funds not anticipated to be needed, but a loan will be considered, if needed.
Town of Wake Forest	1.c.iii Reuse Activities	Unsecured	Town is committed to public/private partnerships to achieve the plan goals and park ownership and maintenance.
Private Developer	1.c.iii Reuse Activities	Unsecured	Partner with private developer to implement the mixed-use concept on the target site.

1.h. Use of Existing Infrastructure: As a former industrial site, sufficient water, sewer, and electrical utilities currently exist at the site and will be reused for the proposed redevelopment. Public/private partnerships will be responsible for financing and constructing site upgrades (greenways, launches, amenities) according to the open space/park plans. No additional infrastructure is anticipated to be needed.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:

Community Need

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

Demographic Data (ACS 2023 5-year est ⁵)	Census Tract 37183054220	Wake Forest	Wake County	North Carolina	US
Total Population	6,541	51,199	1,151,009	10,584,340	332,387,540
Median Household Income	\$81,154	\$120,777	\$101,763	\$69,904	\$78,538
Per Capita Income	\$35,405	\$49,241	\$52,949	\$39,616	\$43,289
Median Home Value	\$377,600	\$435,000	\$422,800	\$259,400	\$303,400
% Under 5 years of age	6.4%	7.0%	5.8%	5.7%	5.7%
% Over 62 years of age	14.2%	15.7%	15.6%	20.6%	20.6%
% Households with SNAP benefits	18.6%	5.7%	6.1%	12.5%	11.8%
% Living Below Poverty Level	12.2%	1.7%	4.9%	9.4%	8.7%

The Town of Wake Forest has experienced significant population increases, but the growth has been uneven with a much larger percentage of residential growth than non-residential growth, resulting in a much smaller amount of tax revenue. As such, the Town is unable to fund the nearly \$4 million remediation as the 2025-2026 budget focuses on providing basic services, such as senior services, facility improvements and repairs, public safety needs, etc. There are no funds locally available for site cleanup and remediation. As the 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 33% and 28% less, respectively, compared to the Town’s. The median home value in the target area is 13% less compared to the Town’s. **The target area has lower income residents**, which limits the target area’s ability to secure funding for the remediation. This grant will enable the community to complete the remediation and attract additional investment for the redevelopment of the target site.

2.b. Health or Welfare of Sensitive Populations: As the table demonstrates, residents living within the census tract by the mill suffer from welfare issues, as demonstrated by the lower median household incomes at an average of \$81,154 compared to the town (\$120,777) and county (\$101,763) averages. There is a higher percentage of households in the target area that rely on SNAP benefits (18.6%) compared to the rest of the town (5.7%) and county (6.1%). A significantly higher percentage of residents within the census tract are living below the poverty line (12.2%) compared to the town (1.7%). The health and welfare of the area was adversely impacted by the

⁵ Census Bureau website – Accessed January 2026

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. The main constituent of concern (COC) is PFAS in the former WWTP ponds. 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. 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 and children) 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 a mixed-use development, which will create economic opportunities, jobs, and housing options.

2.c. Greater Than Normal Incidence of Disease & Adverse Health Conditions: The 2024 Wake County Human Services Public Health Report for Chronic Disease⁶ (latest and smallest geographic level of health data 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 suggests that high levels of certain PFAS may lead to increased cholesterol levels and increased risk of high blood pressure. PFAS is an emerging contaminant that is currently being studied by both the EPA and NCDEQ as to the full extent of the threat to human and environmental health; therefore, research is ongoing to determine their health effects and links to cancer. However, a study funded by the UCSF EaRTH Center 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 breast, ovary, skin and uterus cancers.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 Profiles ⁸ Age-Adjusted Incidence Rate cases per 100,000	Wake County	North Carolina	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.⁹

Birth Defects ¹⁰	Wake County	North Carolina
Rate per 1,000 live births	40.8	33.7

Remediating the WWTP ponds is only possible through EPA Cleanup Grant funding and will eliminate and prevent target area residents from further exposure to the PFAS-contaminated water and sludge, thus helping to reduce the higher incidences of cancer and birth defects in the target area. 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.d. Economically Impoverished/Disproportionately Impacted Populations: Due to the industrial past uses of the target site, populations in the target area disproportionately share the negative environmental consequences of the industrial operations, and now the residents in the target area continue to disproportionately share the negative environmental legacy of the site. Residents around the site are at more risk of exposure to wind-blown contaminated soils or contaminated

⁶ https://s3.us-west-1.amazonaws.com/wakegov.com-if-us-west-1/s3fs-public/documents/2025-07/2024%20PH%20Chronic%20Disease%20Report_Final.pdf

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 December 2025.

⁹ <https://pmc.ncbi.nlm.nih.gov/articles/PMC7473499/>. Accessed January 2026.

¹⁰ NC State Center for Health Statistics. <https://schs.dph.ncdhhs.gov/data/bd/data.htm>. Accessed December 2025.

site runoff. As the table in section 2a shows, the target area residents are also economically impoverished with lower per capita (\$35,405) and household median (\$81,154) incomes compared to the rest of the Town (\$49,241 and \$120,777, respectively). Households are significantly more likely to be living below the poverty level – 12.2% in the target area compared to only 1.7% in the Town. Compared to the Town and the County, the target area has been disproportionately impacted since the mill closure and ignored for almost 30 years.

Site cleanup under this Cleanup Grant will remove site contamination that in turn will help to prevent additional transport and exposure of contaminants to sensitive populations and target area residents. Further, site redevelopment will provide learning opportunities and a recreational area for the community and the region. The addition of a mixed-use development on the northern portion of the target site will provide an economic boost for the area, increase job opportunities, raise property values, and improve the quality of life. Thus, the cleanup and eventual redevelopment of the target site will help address and reduce the disproportionate impacts from legacy environmental contamination and help raise incomes within the community.

Community Engagement

2.e. Project Involvement & 2.f. Project Roles:

Name of organization	Point of contact (name, email & phone)	Specific involvement in the project or assistance provided
Central Pines Regional Council (CPRC)	Lindsay Whitson, Community and Economic Development Director lwhiston@centralpinesnc.gov 919-558-9319	Regional council of governments with experience managing and implementing EPA brownfield grants. She will support grant management, cleanup planning, and outreach efforts.
Neuse River Outfitters (On-Site Local Business)	Graham Jackson, Owner graham@neuseriveroutfitters.com 919-880-1771	A business that leases a portion of the property from the Crump Foundation to operate their kayaking business along the Neuse. They have agreed to serve on the advisory board, provide feedback on cleanup plans, participate in reuse planning, and support outreach.
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 solicit members for the advisory board and engage the community through their respective organizations to participate in project cleanup decisions and reuse planning activities.
Wake Forest Chamber of Commerce	Liz Simperts, President liz@wakeforestchamber.org 919-609-6777	The Chamber will participate on the advisory board 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	A non-profit focused on revitalizing the Town. A representative will participate on advisory board, provide input on cleanup planning, participate in reuse planning, and support outreach activities.
NCDOT – Local Liaison	Grady McCollum, PE gamccollum@ncdot.gov 919-707-4683	DOT representative will participate in community meetings and support reuse planning.
Shearon Farms Homeowners Association (HOA)	4302 Iyar Way Wake Forest, NC 27587	A Homeowners Association from the Shearon Farms neighborhood across U.S. Hwy. 1 adjacent to the property. They have been invited to participate in the advisory board, assist in community outreach activities, and provide input on reuse planning.

2.g. 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*. The Foundation will establish an advisory board, comprised of community stakeholders, adjacent residents and property owners, and potential future users of the site, to help guide the cleanup project and the reuse planning for the site. The advisory board will provide input on project decisions, communicate progress, disseminate information, and invite additional 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 January 4, 2026, asking for feedback and inviting the community to a public meeting on January 13, 2026, at the

Alston Massenburg Center in Wake Forest. Topics of discussion were the ABCA, an outline of the proposed cleanup project, and how the WWTP Site is a catalyst site for redevelopment in the area.

At the start of the project, the Crump Foundation will prepare a Community Engagement Plan with the help of the advisory board to guide community engagement efforts. The plan will include hosting a series of community meetings, which will include virtual options as an alternative to in-person attendance. 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 solicit input on project activities and include contact information for the project team for residents or stakeholders to submit questions and provide feedback on the project. All comments received will be documented and carefully considered by the project team, and a response will be provided in a timely manner to explain how the feedback was incorporated. 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. Translations of materials into languages other than English will be provided upon request.

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

3.a. Proposed Cleanup Plan: The NCDEQ Raleigh Regional Office (RRO) of the Division of Water Resources have directed the National Pollutant Discharge Elimination System (NPDES) permit and ponds at the target site to be closed. In compliance with the directive, PFAS and PFOA impacts to the 8 wastewater treatment ponds have been fully documented and require remedial action in order to fulfill the redevelopment vision for the target site and surrounding area. While no federal or state regulations currently exist to guide cleanup due to the ongoing research and understanding of these contaminants, 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 remain in the ponds. A number of PFAS cleanup technologies exist in the marketplace. These include foam fractionation, PFAS adsorption products, and coagulation techniques. The bench scale test conducted at the target site for a foam fractionation method proved to be successful. The draft ABCA 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. Following wastewater treatment and disposal, the ABCA recommended the in-situ (in place) solidification and stabilization (ISS) of the estimated 16,000 CYD of sludge material in the ponds. ISS renders contaminants in the sludges and sediments inert, not allowing for mobilization and eliminating exposure risk. As such, the selected cleanup alternative will allow stakeholders to proceed with the development plan.

Description of Tasks/Activities & Outputs:

3.b. Project Implementation, 3.c. Anticipated Project Schedule, 3.d. Task/Activity Lead, & 3.e. Outputs: The Crump Foundation, along with project partners, is prepared to complete the following tasks within the proposed four-year grant period. Some tasks, such as Qualified Environmental Professional (QEP) procurement and advisory board establishment, will be completed prior to the grant period as in-kind services to be prepared to start project activities on October 1, 2026. Cleanup costs are based on actual estimates provided by potential contractors.

Task 1: Project Management

b. Project Implementation: The Crump Foundation Project Manager (PM), with support from our project partner, CPRC, will oversee the grant management and compliance with EPA grant terms and conditions. The PM will ensure tasks are completed efficiently and will be responsible for the procurement and oversight of the QEP, which will be completed after grant award announcement but before the October 1st start date. The PM will procure and oversee the brownfields cleanup contractor and report on project activities and accomplishments to stakeholders. The PM 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) 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.

c. Schedule: July 1, 2026 – September 30, 2030; monthly meetings, quarterly reporting. July 2026, competitively procure QEP; Jan 2027 competitively procure cleanup contractor.
d. Task/Activity Lead: The Crump Foundation PM with the assistance of project partner and QEP
e. Outputs: 48 Project Team Meetings; 16 Quarterly Reports; 4 FFR forms; regular ACRES updates; 1 Final Performance Report
Task 2: Community Outreach
b. Project Implementation: The Crump Foundation PM will lead the community outreach efforts with support from the advisory board and 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.
c. Schedule: September 1, 2026 – September 30, 2030; establish advisory board Sep 2026, meet quarterly thereafter; CEP and Info Repository in 1 st quarter; community meetings anticipated in 1 st , 5 th , 9 th , 12 th , and 16 th quarters; outreach materials at least quarterly.
d. Task/Activity Lead: The Crump Foundation PM with support from advisory board and the project team
e. Outputs: 16 advisory board meetings, 1 CEP, 5 outreach meetings at key milestones, 6 outreach materials, 1 information repository
Task 3: Cleanup Planning
b. Project Implementation: With oversight from the Crump Foundation PM, 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.
c. Schedule: October 1, 2026 – September 30, 2028; ABCA, QAPP, HASP in 1 st quarter; bid docs in 2 nd quarter; plans, permits, and engineering 4 th quarter.
d. Task/Activity Lead: QEP with oversight from the Crump Foundation PM
e. Outputs: 1 Final ABCA, Closure/Cleanup Plans, Engineering Plans, Site Surveys, 1 QAPP, 1 HASP, Contractor bid documents
Task 4: Site Cleanup
b. Project Implementation: 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, ISS of approximately 16,000 CYD of sludge, and any necessary remedial sampling activities.
c. Schedule: October 1, 2027 – September 30, 2030; cleanup starts in 5 th quarter, complete by 12 th quarter
d. Task/Activity Lead: QEP with oversight from the Crump Foundation PM
e. Outputs: Site closure and/or Certificate of Completion

3.f. Cost Estimates: The total cost of project activities (\$4,000,000) is summarized in the following Budget Table and cost estimates for each task follows. Approximately 93% of the budget will be dedicated to site cleanup activities. Cost estimates were developed with the assistance of CPRC staff and the experienced QEP currently serving the CPRC Brownfields Assessment Project, who provided typical hourly rates and estimates for project management, community outreach, and cleanup planning tasks and deliverables. Quotes were also solicited from potential contractors for remediation costs and site cleanup activities.

Budget Categories		Task 1	Task 2	Task 3	Task 4	Admin Costs	Total
		Project Management	Community Outreach	Cleanup Planning	Site Cleanup		
Direct Costs	Personnel	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
	Fringe	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
	Travel	\$ 6,200	\$ 0	\$ 0	\$ 0	\$ 0	\$ 6,200
	Equipment	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
	Supplies	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
	Contractual	\$ 43,600	\$ 21,650	\$ 213,850	\$ 82,000	\$ 0	\$ 361,100

Budget Categories	Task 1	Task 2	Task 3	Task 4	Admin Costs	Total
	Project Management	Community Outreach	Cleanup Planning	Site Cleanup		
Construction	\$ 0	\$ 0	\$ 0	\$ 3,630,900	\$ 0	\$3,630,900
Other	\$ 1,800	\$ 0	\$ 0	\$ 0	\$ 0	\$ 1,800
Total Direct	\$ 51,600	\$ 21,650	\$ 213,850	\$ 3,712,900	\$ 0	\$4,000,000
Indirect	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Total	\$ 51,600	\$ 21,650	\$ 213,850	\$ 3,712,900	\$ 0	\$4,000,000

TASK 1: PROJECT MANAGEMENT – Total \$51,600

Travel: 2 Crump Foundation board members to attend 2 regional workshops (2 trips x 2 people x (1 night @ \$150/night hotel + 2 days @ \$50 per die = \$350/person/trip = \$1,400) for training; 2 board members to attend 2 national conferences (2 trips x 2 people x (\$550 airfare + 3 nights @ \$150/night hotel + 4 days @ \$50 per diem/day=\$1,200)/person/trip=\$4,800) = **\$6,200**

Other: Conference registration fees – 2 regional workshops (2x2x\$100/person=\$400) and 2 national conferences (2x2x\$350/person=\$1,400) - **\$1,800**

Contractual: 48 project team meetings (48x\$400=\$19,200); 16 Quarterly Reports (16x\$800=\$12,800); 4 Annual Reports (4x\$225=\$900); 1 final summary report (\$8,000); ACRES updates (6x\$450=\$2,700) = **\$43,600**

TASK 2: COMMUNITY OUTREACH – Total \$21,650

Contractual: 16 advisory board meetings (16x\$500=\$8,000); 1 CEP (\$3,250); 1 Info Repository (\$500); 5 Outreach meetings (5x\$1,500=\$7,500); 6 project outreach materials (6x\$400=\$2,400) = **\$21,650**

TASK 3: CLEANUP PLANNING – Total \$213,850

Contractual: 1 Final ABCA (\$4,500); Planning/Permitting/Engineering documents (avg. \$225/hr x est. 600 hrs=\$135,000); Site-specific QAPP (\$6,600); HASP (\$1,000); Contractor bid documents (avg. \$225/hr x est. 160 hrs=\$36,000); Site survey (avg. daily rate \$2,050 x 15 days=\$30,750) = **\$213,850**

TASK 4: SITE CLEANUP – Total \$3,712,900:

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

Construction: PFAS removal, disposal, oversight (8,070,000 gal @ \$0.17/gal = \$1,356,626); Sludge / Sediment ISS (16,000 cyd @ \$138.08/cyd = \$2,209,274) (**both estimates based on quotes from potential remediation contractors**); Necessary confirmation sampling (avg. \$225/hr x 135 hrs = \$30,375 + labs @ \$34,625 = \$65,000) = **\$3,630,900**

3.g. Plan to Measure and Evaluate Environmental Progress and Results: The project team will meet monthly to track the project's progress in fulfilling the expected project outputs, overall project results, and eventual project outcomes. 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 in accordance with the approved ABCA and Cooperative Agreement and 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 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 the advisory board and community groups, cleanup report, and final ABCA. The outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:**Programmatic Capability**

4.a. Organizational Structure & 4.b. 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. The Foundation is governed by a Board of Directors and Dan Boyce, Chairman of The Foundation, will oversee the project activities as Project Director and support the Project Manager (Mr. Howard). Mr. Boyce has been thoroughly involved with the Foundation and its management since its inception and is an accomplished trial attorney with over four decades of experience. Mr.

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 and 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. Ms. Lindsay Whitson, also a member of the Foundation Board and the Community and Economic Development Director for the Central Pines Regional Council (CPRC), will support Mr. Howard with her expertise and experience in managing CPRC’s FY22 EPA Community-wide Brownfield Assessment Grant. In addition, Ms. Whitson also sits on the Piedmont Triad Regional Council (PTRC) Brownfield Coalition Revolving Loan Fund (RLF) Advisory Board. She has extensive experience managing other federal grants from EDA, HUD and the National Park Service and a state NCDEQ grant. Her management duties include ensuring compliance with the Terms & Conditions, completing and submitting quarterly reports, and managing budgets. Mr. Charles Donnell, also a member of the Foundation Board, has over 35 years of experience with water, wastewater, and stormwater projects. He will support the project through review of plans and specifications, scheduling, coordinating contracts, and serving as a liaison with regulatory agencies. 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. This experienced team will ensure the timely and successful expenditure of funds and the completion of the grant’s technical, administrative, and financial requirements.

4.c. Acquiring Additional Resources: The 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’s process for competitive procurements includes publicly posting solicitations, providing at least a 30-day response period, having multiple Board members review and evaluate the proposals received according to defined criteria (including cost), conducting proposal interviews, and negotiating contracts with the most qualified, cost-efficient firm based on the evaluations. The solicitations will include the Davis-Bacon requirements to ensure all workers receive the appropriate wages.

Past Performance & Accomplishments

4.e. Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Assistance Agreements: The Julia Ellen Crump Foundation has over 20 years of successfully managing funding for our mission of supporting children and family charities.

4.e.(1) Purpose & Accomplishments:

Source	Year	Amount	Project/Purpose	Outputs/Outcomes
Private Donation	2005	\$270,969	Provide support to organizations that provide help and opportunities for underprivileged and handicapped children.	100% of donated funds have been annually disbursed to nearly 20 charitable organizations. The only expenses incurred by the foundation have been taxes (when applicable) and the annual Board of Directors Luncheon Meeting to vote on donations.
Private Donation	2005	\$100,000		
Piedmont Triad Regional Development Corp (PTRDC) RLF Subgrant	2026	\$15,000	Optimize parameters for the selected PFAS removal process to completely destroy the long chain and short chain compounds present in the target site pond water.	Project just awarded but planned output will be optimized parameters to more efficiently and more fully remediate the PFAS with funding from the EPA Brownfield Cleanup grant.

4.e.(2) Compliance with Grant Requirements: To comply with the private donation requirements, the Board of Directors in the past has met annually and now meets quarterly to review progress and vote on donations. Actions are documented in minutes in compliance with the Foundation bylaws, and annual tax reports are filed. The Foundation has maintained compliance since inception. For the PTRDC RLF subgrant, as both a Foundation Board Member and RLF Advisory Board Member, Ms. Whitson will ensure compliance with all RLF subgrant award requirements, including quarterly reporting, work plan submittals, and final report.

Threshold Criteria**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.

7. Brownfields Site Definition:

The Crump Foundation affirms the following:

- The Site is not listed or proposed for listing on the National Priorities List.
- 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
- 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, 2026 using these grant funds. Additional site characterization field work is scheduled for the week of February 23, 2026 with a report to follow.

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, 2026. A copy of the letter is attached.

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 Community-wide Brownfield Assessment Cooperative Agreement (BF-02D32122-0), a Site Eligibility Determination (SED) was approved by EPA Region 4 on December 1, 2022.

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.

v) There is a familial connection between River Place V, LLC and the Crump Foundation. 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:

- 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, Brownfield Redevelopment Section (BRS) 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 BRS 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

- 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 January 13, 2026.
- b. Community Notification Ad
The Crump Foundation placed a Legal Notice in the *Raleigh News & Observer* on January 4, 2026, 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 Alston Massenburg 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 02, Stantec Consulting Services, Inc. (Stantec), November 1, 2024
- Copy of the Legal Notice in the *Raleigh News & Observer* from January 4, 2026, with affidavit of publication.
- Meeting notes from the January 13, 2026, community input session.
- A copy of the public meeting sign-in sheet

15. Named Contractors and Subrecipients

Contractors: Not applicable

Subrecipients: Not applicable

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

Burlington Industries, Inc. (Burlington Mill) 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, 2022 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 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

January 27, 2026

JOSH STEIN

Governor

D. REID WILSON

Secretary

MICHAEL SCOTT

Director

Mr. Dan Boyce, Foundation Board Chairman
Julia Ellen Crump Foundation, Inc.
4141 Parklake Rd., Suite 200
Raleigh, NC 27612
dboyce@maynardnexasen.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 FY26 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:

- 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.

We hope that the the Crump Foundation is successfully awarded this grant, and 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. Jordan Thompson at 704-223-6549 or jordan.thompson@deq.nc.gov or Mr. Michael Montebello at 919-707-3624 or michael.montebello@deq.nc.gov.

Sincerely,

Ms. Jordan Thompson
NC DEQ, Division of Waste Management
Brownfields Redevelopment Section

DocuSigned by:

C464531431644FE...

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



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