From: Spillane, Montgomery <MSpillane@haleyaldrich.com>
Sent: Thursday, July 17, 2025 3:51 PM
To: Genevieve L. Keller-Milliken <genevieve.kellermilliken@des.sc.gov>; Musgrove, Kristen RTX <kristen.musgrove@rtx.com>
Cc: Wilkinson, Bruce <BWilkinson@haleyaldrich.com>; Zlotnick, Andrew <AZlotnick@haleyaldrich.com>; Sherman, Kristen W RTX <kristen.sherman@rtx.com>; Gordon, Sean Collins <sean.gordon@collins.com>; James L. Berresford <Lucas.Berresford@des.sc.gov>; Bellantoni, Diane C (USA) <diane.bellantoni@collins.com>
Subject: Woven Electronics, LLC Site; VCC#12-6203-RP - Feasibility Study Work Plan

Good afternoon Genevieve,

Attached is the Woven Electronics, LLC Site; VCC#12-6203-RP Feasibility Study Work Plan, Rev. 1 for your review. Please let us know if you have any questions. Per your directions below, we do not intend to submit a hardcopy.

Thank you,

Montgomery

Montgomery Spillane, P.G.
Project Manager - Geologist
Licensed in FL, NC, SC

Haley & Aldrich, Inc.
400 Augusta St| Suite 100
Greenville, SC 29601

O: (864) 214-8782
C: (803) 318-7470

haleyaldrich.com

418096
Email Scanned

HALEY ALDRICH

www.haleyaldrich.com

FEASIBILITY STUDY WORK PLAN, REVISION 1
WOVEN ELECTRONICS, LLC
VOLUNTARY CLEANUP CONTRACT #13-6203-RP
BLWM FILE #418096
1001 OLD STAGE ROAD
SIMPSONVILLE, SOUTH CAROLINA

by
Haley & Aldrich, Inc.
Greenville, South Carolina

for
South Carolina Department of Environmental Services
Columbia, South Carolina

File No. 0208312-006
June 2025
Revised July 17, 2025

HALEY & ALDRICH, INC.
400 Augusta Street
Suite 100
Greenville, SC 29601
864.214.8750

June 24, 2025
Revised July 17, 2025
File No. 0208312-006

South Carolina Department of Environmental Services
Bureau of Solid and Hazardous Waste Management
2600 Bull Street
Columbia, South Carolina 29201

Attention: Genevieve Keller-Milliken, Project Manager

Subject: Feasibility Study Work Plan, Revision 1
Woven Electronics, LLC
Voluntary Cleanup Contract #13-6203-RP; BLWM File #418096
1001 Old Stage Road
Simpsonville, South Carolina

Dear Genevieve Keller-Milliken:

On behalf of Woven Electronics, LLC (Woven), Haley & Aldrich, Inc. is pleased to submit this *Feasibility Study Work Plan, Revision 1* (Work Plan) to the South Carolina Department of Environmental Services for the Woven facility located at 1001 Old Stage Road in Simpsonville, South Carolina. This Work Plan covers the proposed outline for the subsequent *Feasibility Study Report*.

Please contact Bruce Wilkinson at 857.498.1277 if you have any questions concerning this Work Plan.

Sincerely yours,
HALEY & ALDRICH, INC.

Montgomery Spillane, P.G.
Senior Geologist

Bruce Wilkinson
Program Manager

Andrew R. Zlotnick, LEP, LEED AP
Principal

Enclosures

c: RTX Corporation; Attn: Kristen Musgrove, P.G.

HALEY & ALDRICH, INC.
400 AUGUSTA STREET
SUITE 100
GREENVILLE, SC 29601
864.214.8750

SIGNATURE PAGE FOR

FEASIBILITY STUDY WORK PLAN, REVISION 1
WOVEN ELECTRONICS, LLC
VOLUNTARY CLEANUP CONTRACT #13-6203-RP
BLWM FILE #418096
1001 OLD STAGE ROAD
SIMPSONVILLE, SOUTH CAROLINA

PREPARED FOR
SOUTH CAROLINA DEPARTMENT OF ENVIRONMENTAL SERVICES
COLUMBIA, SOUTH CAROLINA

PREPARED BY:

Allison Guzman, P.E.
Project Engineer
Haley & Aldrich, Inc.

REVIEWED AND APPROVED BY:

Montgomery Spillane, P.G.
Senior Geologist
Haley & Aldrich, Inc.



Bruce Wilkinson
Program Manager
Haley & Aldrich, Inc.

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1	Property Location Map

1. Introduction

This *Feasibility Study Work Plan, Revision 1* (Work Plan) covers the planned outline for the subsequent *Feasibility Study Report* to be prepared by Haley & Aldrich, Inc. (Haley & Aldrich) for the investigated extent of media, (including discovered constituents of concern extending in areas beyond the property boundary) hereafter defined as "the Site". The portion of the Site considered "the Property" consists of the Woven Electronics, LLC (Woven) manufacturing facility located at 1001 Old Stage Road in Simpsonville, Greenville County, South Carolina. The *Feasibility Study Report* shall follow the *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERLCA* prepared by United States Environmental Protection Agency (EPA) in October 1988 to allow the South Carolina Department of Environmental Services (SCDES) to evaluate remedial alternatives.

This Work Plan is organized into eleven sections:

- Section 1 – Introduction
- Section 2 – Summary of Site Conditions (including soil description, geology and physiography, and hydrogeology)
- Section 3 – Nature and Extent of Contamination
- Section 4 – Summary of Site Risks from a Focused Human Health and Ecological Risk Assessment
- Section 5 – Fate and Transport of Constituents of Concern (COCs)
- Section 6 – Environmental Exposure and Remedial Action Objectives (RAOs)
- Section 7 – Identification and Screening of Technologies
- Section 8 – Development of Remedial Alternatives
- Section 9 – Detailed Evaluation of Remedial Alternatives
- Section 10 – Comparative Analysis of Alternatives
- Section 11 – Potential Deed Restrictions

2. Summary of Site Conditions

The Property is approximately 16.5 acres, identified by the Greenville County Property Assessor as Parcel 0303000100300. A Site location map is provided on Figure 1. In 1963, the Property was developed from vacant land into a weaving and electronics manufacturing facility. The facility interior includes offices, shipping areas, storage, assembly, and weaving process areas. The surrounding land is primarily characterized by industrial and manufacturing facilities as well as vacant and undeveloped land.

As depicted on the topographic map on Figure 1, the Property slopes predominantly to the southwest. The ground surface slopes to the northwest along the northern Property boundary. The watershed drainage is generally to the southwest toward the headwater tributaries of Rocky Creek. The elevation of the Property is approximately 900 feet above sea level sloping southwest to an elevation of 820 feet along the unnamed creek.

An unnamed creek is located on the southern adjacent property owned by Sealed Air Corporation. The unnamed creek flows to the west towards Rocky Creek and ultimately discharges to the Reedy River. Adjacent property to the west is vacant, wooded, and undeveloped, and to the north and east are manufacturing and industrial properties.

2.1 BACKGROUND OF SITE CONDITIONS

Current and historical operations include electrical weaving and processing. The Property is developed with a 100,000-square-foot brick and slab manufacturing building with administrative offices, and work areas for assembly, machining, weaving, and testing. The building has undergone additions and expansion of the interior space since the 1980s. Two unoccupied storage buildings are present in the rear of the property. Paved employee parking areas are present on the north and south sides of the building, and the entire facility is fenced with two access points from Old Stage Road. A 200-square-foot brick storage building outside the main building is used as central accumulation storage along the rear driveway. No outdoor manufacturing, equipment storage, or waste material accumulation areas are evident at the Property. Roof drains discharge rainwater to the parking lot and grassy areas around the building. No stormwater retention ponds, pits, or culverts were noted. A single electrical transformer owned and maintained by Duke Power Company is present in a fenced area along the eastern side of the building, with no leaks or evidence of spills.

The Property is bordered to the north and west by a 22-acre undeveloped, wooded parcel that is owned by Cooper Old Stage, LLC. Warehouses and office buildings are present beyond Old Stage Road along the northern and eastern border of the Property in an upgradient direction. The Sealed Air Corporation manufacturing facility is located south and east of the Property beyond several acres of undeveloped, wooded land. Sandlapper Concrete Products is present beyond the wooded area northwest of the Property. Further to the west and adjacent to the Property's sewer easement terminus, is the KEMET Corporation manufacturing plant property.

A former facility package wastewater treatment system was converted to public sewer discharge in 1984 and no environmental impacts were noted at the time of the Phase I Environmental Site Assessment completed by CRB Geological & Environmental Services, Inc. (CRB) in 2010 (CRB, 2010). The building is served with public water, sewer, natural gas, and electricity. Electrical, municipal water, public sewer, and gas connections are maintained from Old Stage Road. The municipal sewer connection

operates from a sump grinder and lift station near the western end of the building with a pipe connecting the lift station to the sewer main along Old Stage Road (CRB, 2014). The Property boundary includes a narrow strip to the southwest that was formerly used as an easement for the wastewater discharge pipe for the original wastewater drainage system.

2.2 CONCEPTUAL SITE MODEL

The update to the conceptual site model (CSM) was included in prior reports; and therefore, summaries of the soil description, geology, physiography, and hydrogeology from the CSM are included in this section.

2.2.1 Soil Description

Surficial soils near the Site are clay-rich silty residuum of weathered gneiss or schist bedrock with low to moderate permeability. The slope of surface soils follows erosion channels to nearby creeks or drainage basins. The soil is normally red to brown iron rich sandy to clayey silt below a thin organic surface.

2.2.2 Geology and Physiography

The Site is located in the Paris Mountain thrust sheet, provided by United States Geologic Survey in 1991, along the Inner Piedmont Belt of the South Carolina Piedmont physiographic region, where the geology is characterized by a gneiss and schist bedrock that has undergone intense structural deformation with folding and faulting. The bedrock is overlain by saprolitic clays and silts rich in mica and quartz from the underlying metamorphic crystalline bedrock. Based on a review of the Mauldin, South Carolina Quadrangle Geologic Map, the uppermost rock unit is a weathered metamorphic biotite gneiss, which undulates with an underlying sillimanite schist through Greenville County.

Regionally, saprolitic soil may extend to a depth of up to 100 feet before contact with the underlying fractured metamorphic bedrock. The Piedmont Physiographic region is characterized by variable weathering patterns and location of bedrock depth. According to prior reports, bedrock has been encountered within 30 feet below ground surface (bgs) in the downgradient area of the Site, and deeper than 60 feet bgs in the area below the Main Building. The topography slopes to the southwest toward the local watershed drainage.

Prior injection well installation by Haley & Aldrich indicated that neither partially weathered rock (PWR) nor bedrock were encountered at the maximum drilling depth of 55 feet bgs beneath the facility building. CRB's 2014 CSM identified a set of geologic features (preferential flow pathways and boundary conditions) that appear to control groundwater flow and contaminant transport. The primary structural fabric in the vicinity of the Site is oriented in a northeast-southwest direction, with secondary, subordinate orientation trending northwest-southeast. Groundwater beneath the Site flows generally to the south and west. This flow direction parallels the primary structural orientation and intersects in the vicinity of the unnamed creek. The unnamed creek appears to follow the secondary structural orientation.

As indicated in CRB's 2014 CSM, across much of the Site, a discontinuous PWR unit represents a transition zone between the upper and lower units. In the northern portion of the Site, this PWR (transition) zone is absent. When present, the PWR zone is subparallel to the surface topography. Groundwater contained within a sand and quartz gravel layer has been observed to be seeping into the unnamed creek, indicating a preferential groundwater flow path through the layer.

2.2.3 Hydrogeology

The Site subsurface hydrogeology is categorized into three hydrostratigraphic units: saprolite zone, transition zone, and deep (bedrock) zone. The three hydrostratigraphic units are hydraulically connected with groundwater flow to the southwest. The Site encapsulates a recharge plain in the high ground of the east part of the Site to a groundwater baseflow discharge zone located along the unnamed creek southwest of the Site off the Property.

As presented in CRB's 2021 *Feasibility Study* (CRB, 2021), the horizontal groundwater velocity was estimated from 30 feet per year in low-permeability bedrock and clay-rich zones to 150 feet per year in more permeable saprolite; however, successful aquifer testing had not been performed for deeper intervals to provide Site-specific velocity values for the transition zone or bedrock units. Slug tests were performed on MW-4T and MW-6D by Haley & Aldrich during the January 2024 groundwater sampling event to verify flow velocities in the transition zone and bedrock units. Linear velocities using the March 2024 gauging information for the saprolite, transition, and deep hydrostratigraphic units are approximately 186 feet per year, 28 feet per year, and 43 feet per year, respectively.

3. Nature and Extent of Contamination

The feasibility study will include a description of the primary COCs based on previous and current investigations of soil, groundwater, surface water and soil vapor. Summaries of concentrations and vertical and lateral extents of impacted media and source areas will be included. Tetrachloroethene (PCE) is the primary COC and has been detected above the SCDES Maximum Contaminant Level (MCL) in historical and recent sampling events. Degradation products, including trichloroethene, cis-1,2-dichloroethene, and vinyl chloride were not detected above their respective MCLs in recent sampling events.

4. Summary of Site Risks from a Focused Human Health and Ecological Risk Assessment

The feasibility study will document a thorough evaluation to identify and summarize potential Site-related risks through a focused human health and ecological risk assessment. This assessment will provide a detailed analysis of potential exposure pathways, contaminant levels, and their implications for both human populations and ecological receptors. The study will also examine Site-specific conditions that influence risk and will incorporate data from previous investigations for a comprehensive understanding of potential hazards. These findings will form a critical foundation for the development and comparison of remedial alternatives in the subsequent phases of the feasibility study. The following receptors and associated risk exposures will be evaluated:

- Current full-time commercial/Industrial workers that includes:
  - Direct contact with chemicals of potential concern (COPCs) in the surface soil (0 to 2 feet bgs).
  - Inhalation of particulates in outdoor air from wind-blown dust.
  - Inhalation of volatiles migrating from groundwater and/or soil and soil gas, up through the soil column, and into indoor and outdoor air.
  - Direct contact with COPCs in groundwater will not be evaluated because water supply wells do not exist on the Property, nor will they in the future.
- Current potential on-Site trespasser that includes:
  - Direct contact with COPCs in surface soil (0 to 2 feet bgs).
  - Inhalation of particulates in outdoor air from wind-blown dust.
  - Inhalation of volatiles migrating from groundwater and/or soil and soil gas, up through the soil column, and into outdoor air.
  - Direct contact with COPCs in stream surface water during trespassing activities such as swimming/wading.
- Current off-Site resident that includes:
  - Inhalation of volatiles migrating from groundwater and soil gas, up through the soil column, and into indoor air (if impacted groundwater extends to neighboring off-Site residential areas).
  - Direct contact with COPCs in groundwater used as a potable water supply and/or for non-potable uses such as irrigation (if groundwater currently used as a domestic water supply or there are any active wells on properties that may use the water for irrigation).
  - Direct contact with COPCs in stream surface water during recreational activities such as swimming/wading.

<u>Future Potential Receptors and Potentially Complete Exposure Pathways</u>

Since the Site and surrounding area is zoned industrial, hypothetical future use of the Site is assumed to be commercial/industrial.

- Hypothetical future full-time commercial workers that includes:
  - Direct contact with COPCs in surface soil (0 to 2 feet bgs) and subsurface soil (2 to 10 feet bgs) via incidental ingestion and dermal contact.

  - Inhalation of particulates in outdoor air from wind-blown dust.
  - Inhalation of volatiles migrating from groundwater and/or soil and soil gas, up through the soil column, and into indoor and outdoor air.
- Construction worker and/or utility maintenance worker that includes:
  - Direct contact with COPCs in surface soil (0 to 2 feet bgs) and subsurface soil (2 to 10 feet bgs) via incidental ingestion and dermal contact.
  - Inhalation of particulates in outdoor air from dust generated during intrusive work, such as construction/subsurface utility work.
  - Inhalation of vapors from volatilization and dispersion of COPCs from soil to outdoor air.
  - Direct contact with groundwater in a trench (if groundwater is shallower than construction depth) and inhalation of volatile organic compounds (VOCs) migrating from groundwater into ambient air within a trench.
- Future potential on-Site trespasser includes:
  - Direct contact with COPCs in surface soil (0 to 2 feet bgs) and subsurface soil (2 to 10 feet bgs) via incidental ingestion and dermal contact.
  - Inhalation of particulates in outdoor air from wind-blown dust.
  - Inhalation of volatiles migrating from groundwater and/or soil and soil gas, up through the soil column, and into outdoor air.
  - Direct contact with COPCs in stream surface water during trespassing activities such as swimming/wading.
- Hypothetical future off-Site resident includes:
  - Inhalation of volatiles migrating from groundwater and soil gas, up through the soil column, and into indoor air (if impacted groundwater may extend to neighboring off-Site residential areas).
  - Direct contact with COPCs in groundwater that is used as a potable water supply and/or for non-potable uses, such as irrigation (if no use restrictions on groundwater for off-Site residential areas).
  - Direct contact with COPCs in spring and stream surface water during recreational activities, such as swimming and/or wading.
- Ecological Risk Assessment
  - The need to evaluate specific ecological receptors would be determined by first screening media against eco screening levels. If the initial screening shows preliminary risks, then a risk estimation would be completed for lower and upper trophic level receptors for both terrestrial and aquatic habitats as applicable. The specific ecological receptors would be determined by site-specific factors including the site location and state species lists.

5. Fate and Transport of COCs

The feasibility study will include a detailed evaluation of the fate and transport of COCs to better understand their behavior and migration within the Site environment. This assessment will consider both current and future Site conditions and will analyze how physical, chemical, and biological processes influence the movement, persistence, and potential transformation of COCs in soil, groundwater, surface water, and other media. The feasibility study will incorporate Site-specific data, and historical monitoring results to characterize contaminant pathways and potential receptors. These findings will support the development of effective remedial alternatives by identifying areas of greatest concern and anticipating long-term risks associated with contaminated transport.

6. Environmental Exposure and Remedial Action Objectives

The feasibility study will present a comprehensive analysis of environmental exposure scenarios to identify how human and ecological receptors may come into contact with COCs. This evaluation will include both current and potential future land uses, exposure pathways, and receptor populations. The following RAOs are proposed for the feasibility study:

- Groundwater – Mitigate the Site groundwater to below MCLs. Should the results of the future risk assessment indicate that alternative risk based cleanup levels may be appropriate for the Property, these would be presented to SCDES for consideration and approval.
- Surface Water – Mitigate groundwater plume to prevent affects above MCLs in surface water.
- Soil – Prevent direct exposure to soils exceeding industrial Regional Screening Levels.
- Soil Vapor – Mitigate risk of health impacts from soil vapor intrusion into buildings on the Property to below applicable vapor intrusion screening levels (VISLs).

These RAOs, will serve as the foundation for the development and assessment of cleanup alternatives. These RAOs will guide the selection of remedial technologies and ensure alignment with ARARs.

7. Identification and Screening of Technologies

The feasibility study will identify and screen a range of remedial technologies and process options applicable to the Site, considering the nature and extent of contamination, Site conditions, and risk assessment findings. This screening process will include a preliminary evaluation of technology effectiveness and permanence, implementability, and cost. Following this initial screening, the retained technologies will be assembled into potential remedial alternatives and evaluated in detail using the seven criteria outlined in the EPA's guidance for feasibility studies. These criteria include the following Threshold and Balancing Criteria:

- **Threshold Criteria:**
  - Overall protection of human health and the environment
  - Compliance with ARARs
- **Balancing Criteria:**
  - Long-term effectiveness and permanence
  - Reduction of toxicity, mobility, or volume through treatment
  - Short-term effectiveness
  - Implementability
  - Cost

The threshold criteria are mandatory requirements that any acceptable remedy must meet and the balancing criteria are used to weigh the strengths and weaknesses of different alternatives when compared against each other. This comprehensive evaluation will inform the selection of a preferred remedial alternative that balances performance, sustainability, stakeholder input, and regulatory compliance.

8. Development of Remedial Alternatives

The feasibility study will include a structured development of remedial alternatives based on Site characterization data, risk assessment findings, and the outcomes of the technology screening process. Each alternative will be designed to address the specific challenges posed by PCE at the Site, considering contaminant distribution, hydrogeologic conditions, and long-term use. The alternatives will range from no action (as a baseline) to more aggressive treatment and containment strategies, incorporating a mix of source control, plume management, and monitored natural attenuation (MNA) where appropriate. The alternatives will be clearly defined in terms of scope, components, implementation timeframe, and anticipated performance, and will be subjected to a detailed comparative analysis using the criteria outlined in the EPA guidance. This process will ensure that each alternative is technically viable, protective of human health and the environment, and aligned with regulatory and stakeholder expectations. The proposed remedial alternatives to be screened, then evaluated in the feasibility study include the following:

- Alternative 1 – No Action
  - Based on no action moving forward.
- Alternative 2 – MNA
  - Continued groundwater monitoring using the existing monitoring well network to track plume delineation and trend analysis until RAOs are achieved.
  - Implementation of Property Deed Restrictions.
- Alternative 3 – Soil vapor extraction (SVE) beneath the building with MNA
  - Continued use and expansion of SVE beneath the building to control vapor intrusion and provide sub-slab depressurization and soil vapor mass removal in targeted areas identified during recent soil vapor investigations.
  - Continued groundwater monitoring using the existing monitoring well network to track plume delineation and trend analysis until RAOs are achieved.
  - Implementation of Property Deed Restrictions.
- Alternative 4 – Enhanced Reductive Dechlorination (ERD) with Bioaugmentation Bioremediation, SVE beneath the building and MNA
  - ERD with bioaugmentation would be implemented with multiple injections zones. Horizontal wells may be necessary to address the plume beneath the building and vertical injection arrays would be used at select locations downgradient along the plume.
  - Continued use and expansion of SVE beneath the building to control vapor intrusion and provide sub-slab depressurization and soil vapor mass removal in targeted areas identified during recent soil vapor investigations.
  - Continued groundwater monitoring using the existing monitoring well network to track plume delineation and trend analysis until RAOs are achieved.
  - Implementation of Property Deed Restrictions.
- Alternative 5 – Air Sparging with SVE and MNA
  - In this remedial alternative, several fields of air sparging fences would be used to supply compressed air to the bottom of the aquifer and SVE would be employed at the surface

to capture PCE and soil vapor. Pilot study results raised concerns about deploying this technology beneath the building.

- Continued groundwater monitoring using the existing monitoring well network to track plume delineation and trend analysis until RAOs are achieved.
- Implementation of Property deed restrictions.

- Alternative 6 – Abiotic Reductive Dechlorination via Zero Valent Iron (ZVI) with SVE beneath the building and MNA
  - Pilot study evaluations indicated that ZVI would likely be effective at creating permeable reactive zones for groundwater impacted with VOCs. ZVI could successfully be deployed at select zones beneath the building and in the vicinity of the MW-4 cluster, MW-6 cluster, and MW-9 cluster; however, it is likely that additional amendments such as an electron donor and pH buffer may be necessary for the efficacy of the remediation.
  - Continued use and expansion of SVE beneath the building to control vapor intrusion and provide sub-slab depressurization and soil vapor mass removal in targeted areas identified during recent soil vapor investigations.
  - Continued groundwater monitoring using the existing monitoring well network to track plume delineation and trend analysis until RAOs are achieved.
  - Implementation of Property Deed Restrictions.

9. Detailed Evaluation of Remedial Alternatives

The feasibility study will perform a detailed and comparative evaluation of the remedial alternatives developed for addressing contamination at the Site based on the impacted media. This evaluation will be conducted in accordance with the EPA guidance and will apply the seven evaluation criteria to each alternative. Each alternative will be assessed for its ability to meet the RAOs, address the specific fate and transport characteristics of COCs, and accommodate future land use. The results of this detailed evaluation will provide the basis for selecting the most appropriate and effective remedial approach for the Site.

10. Comparative Analysis of Alternatives

The feasibility study will include a comprehensive comparative analysis of the remedial alternatives developed to address contamination at the Site. This analysis will be conducted using the seven evaluation criteria established by the EPA, allowing for a side-by-side assessment of each alternative's strengths and limitations. The criteria will be used to evaluate how each alternative performs relative to the others. Comparative analysis will help identify trade-offs among alternatives, support transparent decision-making, and provide technical justification for selecting a preferred remedy that best meets site-specific objectives and stakeholder expectations.

11. Potential Deed Restrictions

Deed restrictions (including a Stewardship Plan if necessary) are anticipated to be an integral part of the remedial solution. We currently anticipate the following deed restrictions:

- **Soil Management Plan for Intrusive/Construction Activities Beneath the Building**: Prior to performing Property construction or any other activities that involve disturbance of subsurface soils or materials beneath the building floor slab (including, but not limited to excavation, grading, demolition, installation or removal of subsurface utilities or foundations and/or any other intrusive activities) a Property-specific Soil Management Plan (SMP) must be prepared and submitted to SCDES. The SMP will provide guidelines and procedures for assessing and managing subsurface COCs and for disposing of contaminated soil and groundwater (if necessary) during or after construction/soil disturbance activities to prevent unacceptable exposure to COCs. The SMP shall include provisions that ensure that construction/soil disturbance activities meet all applicable and appropriate state regulatory requirements to protect construction workers, excavation workers, and any other personnel present on or near the construction area from exposure to contaminants including the COCs. The proper characterization, management and disposal of groundwater extracted and/or recovered as a result of construction/soil disturbance activities, if any, shall also be addressed within the SMP, properly managed and/or disposed of in accordance with all applicable and appropriate state regulatory requirements.
- **Land Use Restrictions**: Use of the Property will be restricted to commercial and/or industrial activities and operations. Other types of land use including, but not limited to, residential, agricultural, recreational and institutional (including, but not limited to, housing, daycare facilities, playgrounds, schools, and assisted living facilities) are strictly prohibited.
- **Groundwater Use Restrictions**: No use shall be made of groundwater at the Property, by extraction through wells or by means, which use involves consumption or any other beneficial use of the groundwater, as long as the contaminant concentrations of COCs, exceed MCLs for drinking water and/or other beneficial use. This prohibition shall not apply to extraction of the groundwater associated with groundwater treatment or monitoring activities. Furthermore, this prohibition shall not apply to the management or disposal of groundwater extracted and/or recovered from construction-related disturbance of subsurface soils, such as dewatering activities associated with the construction, development, installation of utilities and/or other subsurface or intrusive activities on the Property.
- **New Construction Restrictions/Vapor Intrusion**: Prior to construction of any new building or enclosed structure on the property, available soil and groundwater data will be reviewed to determine whether vapor intrusion controls are required to prevent unacceptable migration of contaminant vapors into the building's ambient air. Woven will consult with SCDES to determine if such controls are required and if required, that the proposed mitigation measures are sufficient to prevent any and all occupants from exposure to contaminants including COCs. In the event that such controls are required, Woven shall incorporate the mitigation measures into the design of proposed new structures as well as appropriate mechanisms to monitor and confirm effectiveness of such measures.

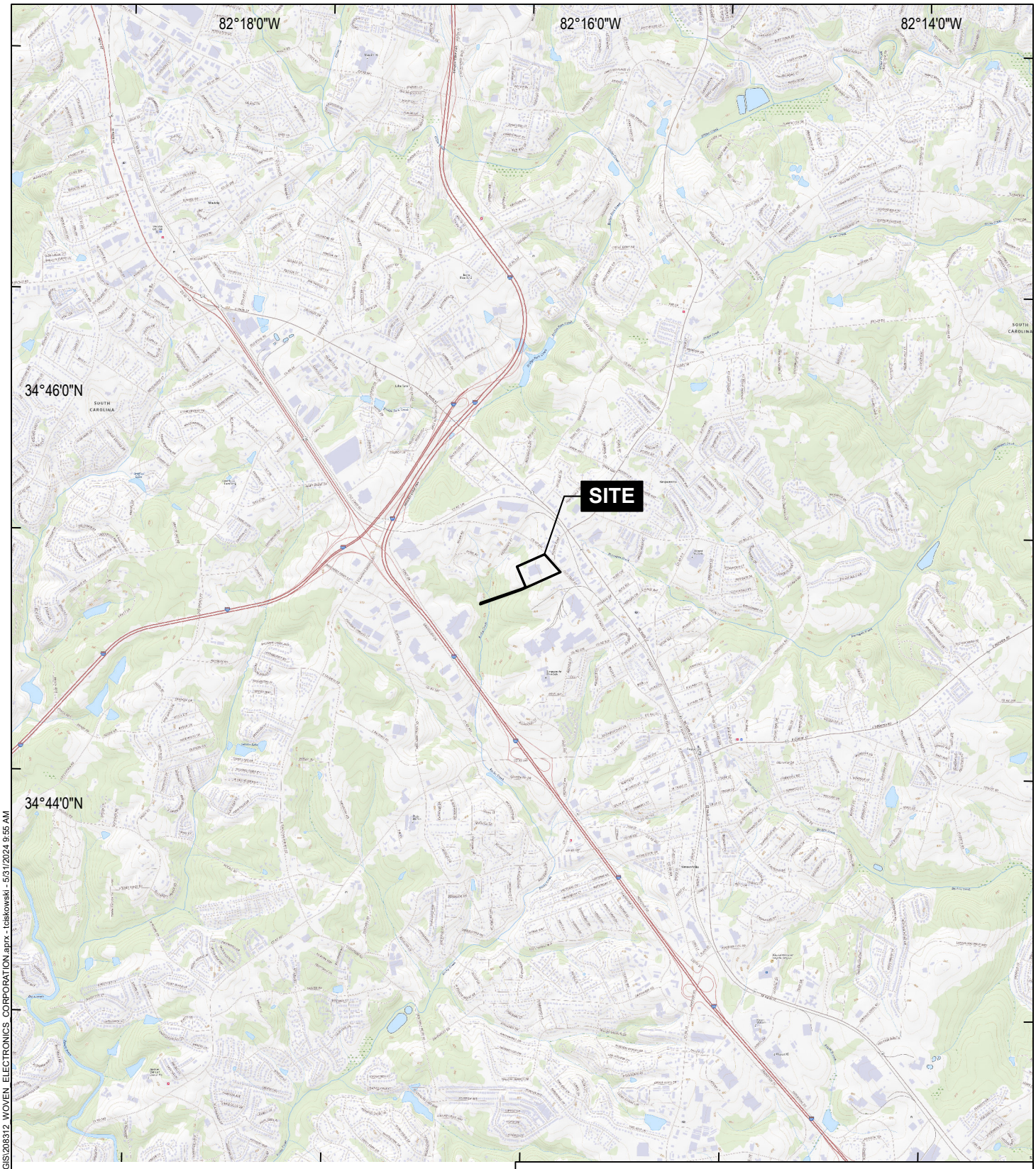
References

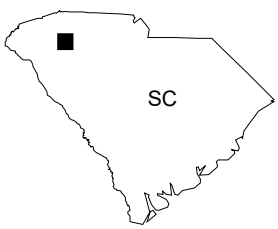
1. CRB Geological & Environmental Services, Inc., 2010. *Phase I Environmental Site Assessment, Woven Electronics, 1001 Old Stage Road, Simpsonville, South, California*. November.

2. CRB Geological & Environmental Services, Inc., 2014. *Conceptual Site Model, June 2014, Woven Electronics, 1001 Old Stage Road, Simpsonville, South Carolina 29681, SCDHEC File 13-62-03-RP*. June.

3. CRB Geological & Environmental Services, Inc., and Woven Electronics Corporation, 2021. *Feasibility Study, Woven Electronics Corporation, 1001 Old Stage Road, Simpsonville, South Carolina, 29681, VCC #13-6203-RP, BLWM Technical File #418096*. March.

FIGURE







MAP SOURCE: USGS
SITE COORDINATES: 34°45'10"N, 82°16'18"W

HALEY ALDRICH

WOVEN ELECTRONICS, LLC
1001 OLD STAGE ROAD
SIMPSONVILLE, SOUTH CAROLINA

PROPERTY LOCATION MAP

APPROXIMATE SCALE: 1 IN = 4000 FT
JULY 2025

FIGURE 1

GIS: \\haleyaldrich.com\share\CF\Projects\0208312\GIS\208312_WOVEN_ELECTRONICS_CORPORATION.aprx - tdiskowski - 5/31/2024 9:55 AM