can be provided in connection with site plan and building permit review.

- Sewer - The Property is partially located within the Falls Run Sewershed. Public sewer is currently located along Warrenton Road though is not provided to the existing industrial facilities along RV Parkway. The Applicant is currently in discussions with the County's Department of Utilities, adjacent and/or surrounding property owners as to the extension of sewer infrastructure to the surrounding unserved area and the Property. More information, including gallons per day, can be provided in connection with site plan and building permit review.

Storm Drainage. The proposed development of the Property will be constructed in accordance with local, state and federal regulations. For stormwater management purposes, the Virginia Department of Environmental Quality regulations for both quality and quantity will be met as required by local and state code. Final design for both quality and quantity treatment will be shown in connection with site plan review.

Schools. The proposed reclassification will have no impact on the school facilities in Stafford County.

Recreational Facilities. The proposed rezoning will have no impacts on the recreational facilities in Stafford County.

ENVIRONMENTAL IMPACT

In September 2020, First Line Technology contracted Total Environmental Concepts, Inc. (TEC) to conduct a Phase I ESA for the site. This assessment was conducted according to the American Society of Testing and Materials (ASTM) 1527-13 Phase I ESA standard. During the course of this assessment, TEC collected evidence from readily available historic records that indicated the site was utilized as a dump circa 1960s until the mid-1970s when the site reverted to being undeveloped wooded land. In a 1937 aerial photograph the site appeared to be accessed by a dirt road to the west, which is currently known as Hornet's Nest Lane. Purportedly this roadway was where people accessed the dump and the operators of the dump periodically burned trash instead of engaging in landfilling. Additionally, during the site assessment conducted as part of the Phase I ESA, a small shooting range was observed in the northwest portion of the site, TEC identified the former dumping operations as a Recognized Environmental Condition in connection with the site.

Given the site's history as a trash dump, TEC recommended a broad range of soil analytical testing for the test pit soil samples including total petroleum hydrocarbons in both diesel and gasoline range organics (TPH-DRO/GRO), total volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), standard metals analysis required under the Resource Conservation and Recovery Act (RCRA Metals), polychlorinated biphenyls (PCBs), polyaromatic hydrocarbons (PAHs), and dioxins.

The Phase II ESA activities completed by TEC included the advancement of eight shallow soil borings throughout the site, and six near surface borings in the vicinity of a small shooting range located on site, and the collection of soil samples for laboratory analyses.

The findings of the limited Phase II ESA completed for the site supports the Phase I ESA conclusion that historic landfilling operations at the site have adversely impacted the underlying environment. Measurable concentrations of RCRA 8 metals, mercury PCB', dioxins, and TPH-DRO were recorded with higher concentrations detected at the southwestern portion of the site in the vicinity of SB-4 and SB-5. However, the results of the investigation were found to be below the Virginia Tier III Industrial Screening Levels with the exception of the 1,000 mg/kg of lead detected in SB-5 which is in excess of the 800 mg/kg Tier III threshold. Tier III Screening Levels for Industrial sites. The VDEQ Tier III standards referenced are based on the US EPA Risk Based Screening Levels (RBSLs) for a commercial property updated in May 2020. According to the EPA website based on data collected by the US Geological Survey, the mean background concentration of lead in soil in Virginia is only 26 mg/kg. (https://www.epa.gov/superfund/usgs-background-soil-lead-survey-statedata)

Given the lead concentration recorded in SB-5, TEC recommends that soil excavated in the vicinity of SB-5 be disposed of at a licensed waste disposal facility. It is further recommended that confirmatory soil samples be collected from the limits of any excavations conducted in this area in order to determine if the impacted soil has been removed successfully. Based on the site development plan provided by the client which is included as Figure 4 the locations of SB-4 and SB-5 appear to be within an area in which a delivery/storage lot is to be constructed.

With regards to the results for nonhalogenated organics, no screening levels for TPH-DRO or TPHGRO have been established by the VDEQ however the concentration of 160 mg/kg recorded in SB- 4 does exceed the VDEQ required reporting threshold of 100 mg/kg indicating petroleum impact to the subsurface. Under VDEQ guidelines, the property owner should report this finding to the VDEQ Northern Regional Office in Woodbridge, Virginia. Upon receiving notification, the VDEQ will open a Pollution Complaint (PC) case. The assigned VDEQ Case Manager will review the information provided including boring locations and analytical data collected to date and determine if the PC case can be closed or if additional investigation is required.

FISCAL IMPACT

The proposed development will have a positive fiscal impact on Stafford County, as follows.

- It is anticipated that there will be approximately 10 new jobs.
- The real property investment is anticipated to be $1+ million.
- The business personal property investment is estimated to be $1.5+ million.
- The tax revenue once developed is estimated to be $25,000 annually.

HISTORIC SITES

No cultural resources have been identified on site, based on Stafford County's cultural resource database.

IMPACT ON ADJACENT PROPERTY

The proposed development will have minimal and/or no negative impact on the adjacent properties. The development site is near a large number of older stock housing (to the south along Route 17) and adjacent to existing light industrial buildings. There are existing M-1 and M-2 zoned properties adjacent to the Property along RV Parkway, a B-2 zoned parcel to the east, and a R1 zoned parcel to the west. The enclosed Development Scenario Plan shows large buffers screening areas along the perimeter of the property whereas any potential future residential development, by-right, could occur.

NOISE, DUST & SMOKE EMISSIONS

Any noise emissions shall comply with the applicable provisions of Chapter 16 of the Stafford County Code of Ordinances. Similarly, any dust and smoke emissions shall comply with the applicable State and Federal standards in final buildout, and to the Virginia Erosion and Sediment Control Handbook ("VESCH") during construction.

First Line Technology
487 Lendall Ln
Fredericksburg, VA

January 30, 2023

Stafford County Board of Supervisors

RE: Rezoning of subject property to M2

First Line Technology is a manufacturer and distributor of products for first responders and the military. We moved our primary operations from Fairfax County to Stafford County (487 Lendall Lane, Fredericksburg, VA 22405) in late 2019 to continue to expand our manufacturing capacity. It was originally planned to do chemical production in a section of the Lendall Lane property which is zoned M2, however as demand for our unique products grew we quickly realized this space would not be large enough.

Currently one of the key chemicals for our products is manufactured in Germany. As this chemical is crucial to products used by our military and federal government, it is vitally important that this production be moved into the United States and we have considered locations throughout the southeast US. When the opportunity arose from the Stafford Economic Development to place this new production facility only a mile away from our current Stafford County property (on RV Parkway), we were excited about the opportunity to keep more of our operations in Stafford County.

The main commercial product that First Line manufactures is “Dahlgren Decon”. This is a unique decontamination solution developed and patented by the U.S. Navy at NSWC Dahlgren. It is a non-corrosive and environmentally friendly chemical solution that can rapidly and safely destroy Chemical and Biological Warfare Agents, as well as Toxic Industrial Chemicals, pathogens such as SARS-CoV-2, and dangerous drugs such as Fentanyl. In fact, Dahlgren Decon was recently recommended by the US EPA as the best available decontaminant for the destruction of Fentanyl on indoor surfaces and materials.

Dahlgren Decon is used by our military, federal agencies, and numerous state and local response agencies including Stafford County Fire. While this product is extremely effective for the needs of first responders, there are many other applications for the core chemistry behind this formula.

At the RV Parkway subject location, First Line Technology will produce one of these core chemicals for use in Dahlgren Decon, but also for the formulation of disinfection and pharmaceutical products. The production process takes place entirely within a vacuum-sealed reaction vessel and there is no discharge into the environment or sanitary sewer of any chemical during this process. The final finished product

is a dry powder which is very safe to handle. It is drummed and shipped off-site for final end-user packaging.

The chemical produced is a unique form of peracetic acid. Peracetic acid is essentially acetic acid (white vinegar) with an extra oxygen molecule. Peracetic acid has been used for decades to sanitize and disinfect produce and meat, as it can be applied directly to the food and does not have to be rinsed off since it naturally breaks down into water, oxygen, and vinegar. It is also used to sterilize surgical equipment and is becoming more popular as an alternative to bleach-based disinfection. It has been determined safe and environmentally friendly by numerous federal agencies including the EPA, FDA, and Dept. of Agriculture. First Line has the exclusive license to manufacture this unique form of peracetic acid which is far safer to handle and store. Unlike traditional peracetic acid formulations, ours is not classified as a hazardous material under US and international guidelines.

The manufacturing process is currently done in a German chemical plant and has been in operation for over 15 years with no safety incidents, accidents, or releases into the environment. First Line Technology is working closely with the German manufacturer to replicate this process in Fredericksburg. First Line Technology has been in business for 19 years, and have been handling, processing, milling, and packaging this chemical at the Lendall Lane facility since 2019 with no major safety incidents and zero chemical spills.

First Line Technology would be bringing manufacturing and production that is occurring in Germany into the United States with a home in Fredericksburg, VA. This manufacturing and production would bring new science-related jobs to the region.

Not only will this project bring jobs to the region, it is also a strategic resource for local emergency responders. First Line Technology believes in Corporate Social Responsibility and being a good member of the community. During the COVID-19 pandemic we worked closely with the Stafford County Fire Department to provide sprayers and disinfectants for emergency vehicles, schools, and county buildings. We also provided the use of one of our AmbuBus mobile medical transports to provide vaccine distribution to home-bound patients. The location of a production facility of a versatile chemical disinfectant in Stafford County is not only a local resource but a resource of importance nationally.

Best Regards,

Corey Collings
Director, Research, Development, Testing, and Evaluation
First Line Technology