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February 17, 2012

Mr. Terry Stilman  
Environmental Protection Agency On-Scene Coordinator  
Region 4  
61 Forsyth Street SW  
Atlanta, Georgia 30303

Re: Zonolite Place – Revised Activity-Based Sampling Addendum

Dear Mr. Stilman:

The purpose of the attached Addendum is to finalize the activity-based sampling procedures outlined in Grace's approved September 26, 2011 Work Plan, Quality Assurance Project Plan (QAPP), Air Monitoring Plan, and supplemental December 29, 2011 "Sampling Addendum".

If you have any questions regarding this Revised Activity-Based Sampling Addendum, please contact Bob Marriam at (901) 820-2023.

Sincerely,



Robert J. Medler  
Project Coordinator  
Remedium Group, Inc.

Attachment

cc: Kevin Eichinger - EPA  
Lynne Gardner - Grace  
Brent Jacobs - URS  
John Johnson, Esquire - DeKalb County  
Robert Marriam - Grace  
Bill Miller - Grace  
Jay White – URS

**Revised ABS Sampling Procedures Addendum**  
**Atlanta, GA Zonolite Place Site (GAO 144)**

The Revised Removal Action Work Plan for the Zonolite Place site in DeKalb County, GA was submitted to USEPA on September 26, 2011. The confirmation activity-based sampling (ABS) protocol included in the Work Plan assumed that the only surface where ABS would be performed would be bare soil.

Discovery of large concrete foundation slabs during excavation requires a modification to the original ABS protocol.

The sampling plan is hereby modified to include two different ABS protocols. Excavated soil areas will be sampled during raking events and the concrete foundation slabs will be sampled during sweeping events.

Specific details for the post-excavation activity-based sampling were developed on January 26, 2012 in a meeting which included representatives from USEPA, Tetra Tech, and W. R. Grace.

The following activity-based sampling activities will be implemented at the Atlanta, GA Zonolite Place site (GAO 144).

Raking for bare soils and sweeping for concrete foundation slabs are appropriate activities for sites with outdoor areas that are potentially contaminated with asbestos. Each raking or sweeping event participant will rake or sweep the entire designated area to remove dust and debris using an 18- to 30-inch push broom, a garden rake, or leaf rake (or some combination thereof). A grab or multi-point composite bulk material sample of the debris generated will be collected after each round of activity is completed.

Since the Atlanta, GA Zonolite Place site (GAO 144) does not provide a consistent landscape that would allow workers to safely conduct the ABS activities exactly as described in the SOP No. 2084, EPA, Tetra Tech, and W.R. Grace have agreed upon the following procedure for conducting ABS activities:

- Each participant will don the appropriate PPE (see Appendix D of September 26, 2011 Work Plan) and the personal sampling pumps contained in a backpack or harness. The open-faced inlets (inlet caps removed) to the filter cassettes attached to the participant will be oriented within the participant's breathing zone and the pumps will be turned on.

- Each participant will rake/sweep in the designated area that has been deemed safe for activities and will rotate positions (approximately every 40 minutes) with the other participants to simulate variance of the activity and will continue to work in the designated area for the entire duration of the activity period (120 minutes).
- The participants will begin along one edge of the designated area and rake/sweep the debris from that edge across the designated area to the opposite side, leaving the accumulated debris on the opposite side.
- Turning 90 degrees, in a clockwise direction, the participants will then rake/sweep starting at this new edge and proceed across the designated area to that edge's opposite side.
- Whenever raked/swept material is encountered piled up along an edge as a result of earlier raking/sweeping, that material will be raked/swept back across the designated area to the opposite side.
- The participants will repeat this sequence of raking/sweeping, re-spreading the dust and debris as it accumulates along the designated area's edges, for the duration of the sampling period, usually 120 minutes.

ABS Round 1 (raking) will occur inside of the existing excavated area of the site and will be conducted by three participants, working inside the designated activity area for the entire duration of the activity. Each participant will be identified by a number for purposes of reference.

Each participant will carry a sample set consisting of one high flow rate and one low flow rate air pump (not including collocated or duplicate samples). Refer to the first bullet of the above described ABS activity for details.

ABS Round 2 (sweeping) will occur on the exposed concrete foundation slabs and will follow the procedures outlined above in the raking scenario.

2/17/2012