

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Old Davis Hospital - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #1
Initial
Old Davis Hospital
B48Q
Statesville, NC
Latitude: 35.7827434 Longitude: -80.8990487

To:
From: Kenneth Rhame, OSC
Date: 6/9/2016
Reporting Period: 6/6/2016 to 6/9/2016

1. Introduction

1.1 Background

Site Number:	B48Q	Contract Number:	
D.O. Number:		Action Memo Date:	6/8/2016
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/9/2016	Start Date:	6/9/2016
Demob Date:		Completion Date:	
CERCLIS ID:	NCN000404863	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA

Time-Critical Removal

1.1.2 Site Description

The Old Davis Hospital Site (Site), also known as the Old Statesville Hospital, is a closed and abandoned hospital complex that operated from the 1920s into 1980s. Deed information indicates that the property consists of approximately 7.5 acres. According to information obtained from the North Carolina Department of Health and Human Services, the hospital structure itself is about 250,000 square feet in size. On-site observations and video and still images available on the internet, indicate that the still-standing portion of the hospital is in an advanced state of disrepair. Analytical data confirms that the Site contains significant amounts of Asbestos Containing Material (ACM).

1.1.2.1 Location

The Site is located at 706 and 709 West End Avenue, Statesville, Iredell County, North Carolina.

1.1.2.2 Description of Threat

Asbestos is a hazardous substance as defined in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 101 (14). The North Carolina Health Hazards Control Unit (HHCU) has documented the presence of friable asbestos in debris piles generated by demolition activities at the Site. The friable asbestos was observed in two primary areas of concern, both are located outside of the main building in two large demolition debris piles; one is located east of the main building and the other is located to the rear of the main building. The two piles are each estimated at approximately 100 feet by 150 feet by 10 feet in height.

The Site is located immediately proximate to the Mitchell Community College, a multi-family residential complex and single family dwellings. The Site is also a locally prominent paranormal destination as evidenced by numerous YouTube videos and websites and will continue to be an attraction because the major portion of the hospital building is still intact. The debris piles containing friable asbestos poses a potential threat to the surrounding community and anyone entering the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The North Carolina Health Hazards Control Unit (HHCU), which is the State agency that implements the

asbestos program in North Carolina, issued permits for demolition of the hospital and associated buildings in January and September of 2015. The EPA Region 4 Regional Emergency Operations Center (REOC) received a National Response Center (NRC) notification of potential improper demolition activities and alleged release of asbestos at the Site on October 7, 2015. In follow up, the EPA notified HHCU and provided them with the information in the NRC Incident Report (#1130286). The HHCU and an Iredell County Building Inspector performed a site visit and walk through of the interior of the hospital building on October 12, 2015. The following day, NCHHCU returned to the Site to collect samples of suspect asbestos-containing materials and to further document the Site conditions. It was during this October 13, 2015 site visit that suspect asbestos-containing materials were observed by state personnel within piles of demolition debris located outside the main hospital building. HHCU collected samples from the Site of suspected ACM on October 15 and 27, 2015.

Of the 53 samples collected from intact portion of the hospital building and the debris piles, 21 were confirmed to contain asbestos. Asbestos concentrations ranged up to 75% Chrysotile and 20% Amosite.

An EPA Region 4 On-Scene Coordinator (OSC) and inspectors with the Region 4 Air, Pesticides and Toxics Management Division (APTMD) visited the Site on June 2, 2016. Representatives from HHCU as well as the property owner were also present. During this site visit, the OSC and the APTMD inspectors observed uncontrolled piles of debris and ACM. EPA personnel also noted that the Site was inadequately secured and is located immediately adjacent to a community college and residential structures. These findings were reported to regional management.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Following the inspections noted in the previous section, HHCU sent a letter to the property owner and the demolition contractor on November 4, 2015, explaining the regulatory requirements associated with demolition of potentially asbestos-containing structures. An HHCU Notice of Violation (NOV) was sent to the property owner and demolition contractor on March 2, 2016. The NOV directed that a thorough inspection and inventory of suspect asbestos-containing materials be performed by an accredited asbestos inspector and that an asbestos abatement design be developed and submitted for review prior to beginning cleanup or demolition activities. The NOV further specified that the cleanup should be performed by North Carolina accredited personnel in accordance with applicable state and federal regulations and completed as quickly as possible.

On June 6, 2016, the North Carolina Department of Environmental Quality (DEQ) in coordination with the HHCU requested via email that the EPA Region 4 Emergency Response, Removal and Prevention Branch (ERRPB) conduct a Removal Site Evaluation at the Site and take action as necessary and appropriate to facilitate mitigation of potential threats associated with asbestos-containing demolition debris located on the property. Also on June 6, 2016, the HHCU sent a letter to ERRPB expressing their concern with the Site.

2.1.2 Response Actions to Date

EPA Region 4 ERRPB arrived to identify locations for perimeter air sampling on 6/6/2016. Perimeter air sampling was initiated on 6/7/2016. Sampling activities were limited to city right-of-way areas immediately adjacent to the Site because the EPA did not have access authorization from the property owner for on-site sampling or removal activities.

Access for implementation of stabilization activities including installing of appropriate fencing and signage, wetting and/or encapsulation of the debris piles and site security, as necessary, was secured on the afternoon of June 7, 2016. A fund-lead action memorandum for funding of these interim actions was approved on June 8, 2016. Implementation of these stabilization efforts are considered critical pending the outcome of enforcement activities aimed at achieving proper management and disposal of the asbestos-contaminated debris piles.

An ORC attorney and Superfund Division community involvement and enforcement staff have been assigned to the Site.

EPA Region 4 Emergency and Rapid Response Services (ERRS) Contractors are mobilizing to the Site on 6/9/2016 to begin on-site stabilization measures.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The EPA Region 4 Office of Regional Counsel (ORC) and APTMD secured verbal access from the property owner to conduct a site visit on June 1, 2016. Following the June 2nd site visit described in Section 1.1.3. and the June 6th State referral, ERRPB and ORC opened discussions with the property owner regarding the need to stabilize site conditions and properly manage and dispose of the ACM within the demolition debris piles. On the afternoon of June 7th, the property owner provided EPA access to take stabilization measures as a fund-lead activity under Superfund authority pending the outcome of negotiations regarding approval and execution of an Administrative Order to properly dispose of the ACM as an enforcement-lead action.

All Superfund actions are being carried out in coordination with APTMD, ORC, and the Office of External Affairs as well as state and local officials.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

1. Secure Site with fencing, signage and security as necessary;
2. Develop Site Safety Plan;
3. Stabilize debris piles that contain ACM located outside the Old Davis Hospital in accordance with applicable state and federal asbestos laws and regulations
4. Implement dust suppression and/or encapsulation to prevent off-site migration of dust and asbestos fibers;
5. Conduct air monitoring/sampling to insure that the dust suppression methods are effective.

2.2.1.1 Planned Response Activities

Current activities are confined to those measures listed in section 2.2.1. Final disposition of the debris piles will be determined pending the outcome of ongoing enforcement activities.

2.2.1.2 Next Steps

Next steps will consist of implementing the planned stabilization activities as quickly as possible and continuing enforcement efforts. Coordination with appropriate federal, state and local agencies and officials will continue throughout the removal action. Engagement of the community will be conducted as a parallel process.

2.2.2 Issues

Site security and stabilization and disposal of the asbestos-containing debris piles is the current scope of the Superfund action. The appropriate authority and process for addressing the remaining portion of the hospital complex is being evaluated.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.