

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #4
ACM Contaminated Debris Removal
Old Davis Hospital
B48Q
Statesville, NC
Latitude: 35.7827434 Longitude: -80.8990487

To: James Webster, USEPA R4 ERRPB
Steve Lewis, NCDENR
Jim Bateson, DENR

From: David Andrews, OSC

Date: 7/27/2016

Reporting Period: 7/13/2016 thru 7/27/2016

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:	6/9/2016
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 (HHCUC), 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 HHCUC and provided them with the information in the NRC Incident Report (#1130286). The HHCUC 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, NCHHCUC 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. HHCUC 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 HHCUC 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, HHCUC 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 HHCUC 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 HHCUC 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 HHCUC sent a letter to ERRPB expressing their concern with the Site. Region 4 EPA mobilized contractor support from Emergency Rapid Response Service (ERRS) contractor, Environmental Restoration, LLC, and Superfund Technical Assessment and Response Team (START) contractor, Tetra Tech, Incorporated to assess and stabilize the site property.

The week of July 11, 2016 EPA and contractor support transitioned from site stabilization to ACM debris removal operations.

2.1.2 Response Actions to Date

June 6 – 11, 2016 - Perimeter Air Sampling - Access Authorizations were received from neighboring properties (Mitchell Community College and Housing Authority Apartments) to enhance sampling locations. Perimeter Air Sampling Continued until June 11, when wetting operations began. All perimeter air sampling results have been non-detect for asbestos fibers. Sampling results are attached in the documents section. Wetting operations continued prior to removal operations based on visual observations and weather forecasts.

June 13 – July 3, 2016 - Contractor has been acquired, security is present at the Site from 7 pm to 7 am daily and 24 hours a day on weekends. This schedule was subject to change based on EPA and EPA contractor site presence and completion of security fencing.

June 20 – 29, 2016 - Installation of a perimeter fence line consisting of 6-ft tall chain-link with three-tier barbed wire, and approximately 2,500 feet in length was installed.

July 5 – 12, 2016 – Emergency Rapid Response Service (ERRS) contractor (Environmental Restoration, LLC) mobilized equipment, office trailer and personnel to the Site.

July 13 – 15, 2016 – ERRS and two subcontracted transport services (Thomas Transport and Southern Logistics) initiated removal operations on the eastern side of the Site that accesses Cherry Street. Throughout the work hours at the Site, the Superfund Technical Assessment and Response Team (START) maintained air quality surveillance along the perimeter fence line as well as monitoring personnel within the work zone.

During this period, 24 shipments totaling 602.8 tons were shipped off site for disposal.

July 14, 2016 - The North Carolina Department of Health and Human Services (DHHS), Division of Public Health (DPH), Health Hazards Control Unit (HHCUC), which is the State agency that implements the asbestos program in North Carolina visited the Site to observe removal operations.

July 18 – 22, 2016 - ERRS and subcontracted transport services continue removal operations on the

eastern side of the Site accessible by West End Avenue. START continued to maintain air quality surveillance along the perimeter fence line as well as monitoring personnel within the work zone.

During this period, 68 shipments totaling 1,743.35 tons were shipped off site for disposal.

July 25 – 27, 2016 - ERRS and subcontracted transport services continue removal operations on the eastern side of the Site accessible by West End Avenue. Operations transitioned to the southwest area of the Site accessed by Cherry Street in the afternoon on July 26th. START continued to maintain air quality surveillance along the perimeter fence line as well as monitoring personnel within the work zone.

During this period, 43 shipments totaling 1154.50 tons were shipped off site for disposal.

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

Negotiations between Regional Counsel and the PRP continue.

Efforts to identify additional PRPs continue.

Property Owner has signed Access Agreement.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
NA 2212, Asbestos,9, PG III,RQ	ACM Demolition Debris	3500.65 Tons	Numbered Sequence: 1 - 135	Double Poly Wrap	Anson County LF & Charlotte Motor Speedway LF

2.2 Planning Section

2.2.1 Anticipated Activities

ERRS:

- Bulk removal operations will continue.
- Detail work to follow requiring small equipment and manual labor.

START:

- Continue surveillance air monitoring of work area and site perimeter.
- Conduct post-removal air sampling within removal area and adjacent to building entrance areas after removal activity has ceased.

2.2.1.1 Planned Response Activities

Remove debris piles containing ACM and properly transport and dispose of ACM located outside of the Old Davis Hospital Buildings.

2.2.1.2 Next Steps

Continue public outreach and coordination with community, state and local officials.

2.2.2 Issues

None at this time

2.3 Logistics Section

This position is served by the OSC

2.4 Finance Section

2.4.1 Narrative

June 8, 2016 Action Memorandum (interim stabilization work):

ERRS (Delivery Order: 0016) - \$175,000

START (Delivery Order: TT-01-52) - \$25,000

June 30, 2016 Action Memorandum (Time Critical Removal) & Ceiling Increase:

ERRS - \$1,450,000

START - \$100,000

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$925,000.00	\$431,230.75	\$493,769.25	53.38%
TAT/START	\$25,000.00	\$11,968.17	\$13,031.83	52.13%
Intramural Costs				
Total Site Costs	\$950,000.00	\$443,198.92	\$506,801.08	53.35%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

This role is served by the OSC.

2.5.2 Liaison Officer

This role is served by the OSC.

2.5.3 Information Officer

This role is served by the OSC.

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

- The North Carolina Department of Health and Human Services (DHHS), Division of Public Health (DPH), Health Hazards Control Unit (HHCU), which is the State agency that implements the asbestos program in North Carolina.
- Mitchell Community College
- Statesville Police Department

4. Personnel On Site

EPA - 1 (FOSC)

START - 1

ERRS - 10

5. Definition of Terms

ACM – Asbestos Containing Material or Substances

Asbestos - Refers to a set of six naturally occurring fibrous minerals. Asbestos has six primary sub-classifications: chrysotile, crocidolite, amosite, anthophyllite, tremolite, and actinolite. Among these, chrysotile and amosite asbestos are the most common.

EPA – Environmental Protection Agency Region 4

ERRPB – Emergency Response, Removal and Prevention Branch (formerly ERRB)

ER – Emergency Response

ERRS – Emergency Rapid Response Service (Environmental Restoration, LLC)

f/cc – Fibers per cubic centimeter

DHSS - The North Carolina Department of Health and Human Services

DPH - Division of Public Health

HHCU - Health Hazards Control Unit

NCDENR - North Carolina Department of Environment and Natural Resources

OSC – Federal On-Scene Coordinator

PRP – Potential Responsible Party

RML – Regional Removal Management Level

RSE – Removal Site Evaluation

SOSC – State On-Scene Coordinator

START – Superfund Technical Assessment and Response Team (Tetra Tech, Inc)

TSI - Thermal System Insulation

TSS – Region 4 Technical Services Section (Resource & Scientific Integrity Branch/ REG 4 Superfund Division)

6. Additional sources of information

6.1 Internet location of additional information/report

N/A

6.2 Reporting Schedule

N/A

7. Situational Reference Materials

N/A

POLREP #4 Last Updated 8/2/2016