UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303-8960

**January 25, 2018**

(b)(6) [redacted]

SUBJ: EPA Asbestos Removal at 315 Sloan Street

Dear (b)(6) [redacted]:

Enclosed, you will find the Removal Action Status Report for the property located at 315 Sloan Street in Davidson, North Carolina. The report summarizes information regarding the original asbestos sampling, a description of the Removal Action conducted on the property, a summary of multimedia sampling results, details on the restoration of the property and the timeframe of the Removal Action. We have also included a figure of the removal area and the air sampling locations, a table of the air sampling results and photographs of the removal activities.

The removal activities have been completed and there are no further actions needed on the above-mentioned property. If you have any questions or need further information, please do not hesitate to contact Jordan Garrard, US EPA, Federal On-Scene Coordinator directly at (678) 644-8648, via email: garrard.jordan@epa.gov or myself directly at (678) 575-8132, via email: miller.angela@epa.gov, at any time.

It was such a pleasure working with you and your community. Thank you for your cooperation and patience throughout the removal activities.

Sincerely,

Angela R. Miller, US EPA
Community Involvement Coordinator

Enclosure(s)

cc: Jordan Garrard, US EPA, Federal On-Scene Coordinator
Miguel Alvalle, NC DEQ

# REMOVAL ACTION STATUS REPORT
# DAVIDSON ASBESTOS

**Property Address:** 315 and 319 Sloan Street, Davidson, Mecklenburg County, North Carolina

**Original Asbestos Sampling Information:** Surface soil samples were collected at a depth of 0 to 3 inches below ground surface (bgs) and subsurface soil samples were collected at a depth of 3 to 6 inches bgs. Analytical results are reported in increments of 0.25 percent asbestos. Those samples with analytical results reported as "trace" (less than 0.25 percent asbestos) were further analyzed by fluidized bed analysis and reported in soil concentrations of phase contrast microcopy equivalent (PCME) structures per gram (s/g).

| Property Address | Area Sampled | Surface Soil Results (percent asbestos) 0-3 inches deep | Subsurface Soil Results (percent asbestos) 3-6 inches deep |
|---|---|---|---|
| 319 Sloan Street | Front Yard | No Asbestos Detected | 0.0 s/g |
| | Back Yard | 1.5 | 0.0 s/g |

**Description of Removal Action:** The soil was excavated to an approximate maximum depth in the following areas: driveway of 315 Sloan Street to 24 inches; back yard and driveway of 319 Sloan Street to 12 inches; and, tree line and residential drip line areas of 319 Sloan Street to 3 inches (See Appendix 1). Visual inspections of the excavated areas for asbestos-containing materials (ACM) were conducted by a State of North Carolina-accredited asbestos inspector and air monitor. Additional removal was conducted in those areas where ACM were still visibly present. Once ACM was no longer visibly present at 319 Sloan Street, restoration of the areas excavated was were allowed to commence. ACM was still visibly present in the driveway of 315 Sloan Street. The remaining ACM was photographed and documented in the site logbook before restoration began.

**Summary of Multimedia Sampling Results:** Perimeter air sampling was conducted at six stationary locations during removal activities from June 13 through June 14, 2017. Air sampling was conducted daily at three to four of those locations as weather permitted and based on wind direction and removal activities. The analytical results were less than the limit of detection and ranged from less than 0.00015 fibers per cubic centimeter (f/cc) to less than 0.00066 f/cc (see Table 1 in Appendix 2). A five-point composite soil sample was collected from the front yard and driveway of 315 and 319 Sloan Street before restoration began, and the analytical result detected a trace amount of chrysotile asbestos. A 12-point composite soil sample was collected from the driveway located between 315 and 319 Sloan Street and the back yard of 319 Sloan Street before restoration began, and analytical results indicated no asbestos detected (see Table 2 in Appendix 2).

Perimeter air sampling and composite soil sampling were conducted by a State of North Carolina-accredited air monitor with oversight from a State of North Carolina-accredited supervising air monitor (SAM).

**Restoration of Property:** Restoration work included following activities: installation of snow fencing on top of the subsurface of the excavated driveway and back yard of 319 Sloan Street; backfill, topsoil, and sod in the back yard of 319 Sloan Street; backfill and rock in the driveway

of 319 Sloan Street; and installation of snow fencing on top of the subsurface and around the sides of the excavated driveway, backfill, and rock at 315 Sloan Street. All areas were restored to the original height of the surrounding grade.

**Time Frame of Removal Action:** Removal activities began on June 12, 2017, and were completed on June 14, 2017.

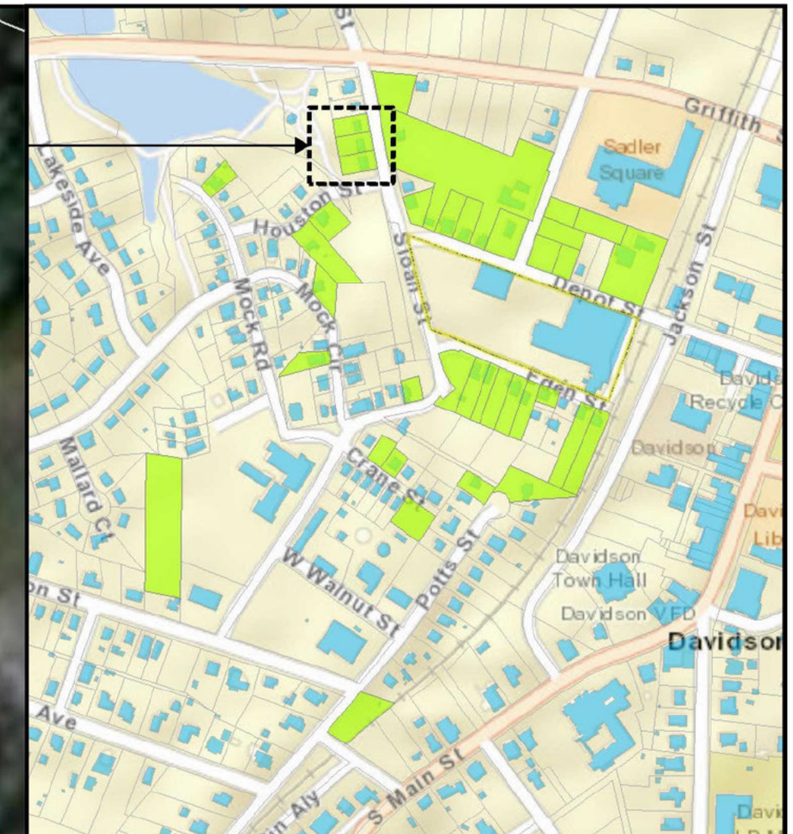
Appendices to this report include:

1. Figure of removal area and air sampling locations
2. Tables of air and soil sampling results
3. Photographic log of removal activities

## APPENDIX 1

**FIGURE**

(One Page)




**Legend**

- Air Sample
- Removal Area
- Parcel Boundary
- Approximate Site Boundary

***Inset Map***

- *Parcels with Removal Activities*
- Building/Structure

**319 Sloan Street**

N
W E
S

0 20 40
Feet

Map Sources:
Aerial Imagery, Bing Maps, 2012-2014;
Parcels, http://maps.co.mecklenburg.nc.us

**United States Environmental Protection Agency Region 4**

**FIGURE 1**

Removal Areas and Air Sampling Locations

**TDD Name:** Davidson Asbestos

**TDD No.:** TT-01-071

| **City:** | **County:** | **State:** |
|---|---|---|
| Davidson | Mecklenburg | North Carolina |

TETRA TECH

**Date:** 9/21/2017

**Analyst:** dale.vonbusch

File: C:\TT-01-071_Davidson_Asbestos\mxd\acm_working_mapbook_v3.mxd

## APPENDIX 2

## SUMMARY TABLE OF ANALYTICAL RESULTS

(Two Pages)

# TABLE 1
# TRANSMISSION ELECTRON MICROSCOPY RESULTS
# DAVIDSON ASBESTOS
# DAVIDSON, MECKLENBURG COUNTY, NORTH CAROLINA

| Sample Id | Location | T | Pump No. | Time Start | Time Stop | Total (Min) | Pump Flow Rate (lpm) | | | Total Sample Volume (l) | PCM Results (f/cc) | Asbestos Fibers Detected | TEM Results in PCME (f/cc) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Initial | Final | Average | | | | |
| DA-319SS-AA-L01-061317 | 319 Sloan Street - Location 1 | AA | G6 | 8:09 | 14:49 | 400 | 11.40 | 11.57 | 11.49 | 4594.0 | 0.00059 | 0 | <0.0002 |
| DA-319SS-AA-L02-061317 | 319 Sloan Street - Location 2 | AA | G4 | 8:12 | 14:51 | 399 | 11.25 | 11.39 | 11.32 | 4516.7 | 0.0006 | 0 | <0.0003 |
| DA-319SS-AA-L03-061317 | 319 Sloan Street - Location 3 | AA | G1 | 8:31 | 14:55 | 384 | 11.56 | 11.55 | 11.56 | 4437.1 | 0.00061 | 0 | <0.00015 |
| DA-319SS-AA-L04-061317 | 319 Sloan Street - Location 4 | AA | G3 | 8:18 | 14:09 | 351 | 11.33 | 11.15 | 11.24 | 3945.2 | 0.00075 | 0 | <0.00038 |
| DA-319SS-AA-L05-061417 | 319 Sloan Street - Location 5 | AA | G6 | 8:40 | 14:43 | 363 | 11.57 | 11.00 | 11.29 | 4096.5 | 0.00066 | 0 | <0.00066 |
| DA-319SS-AA-L06-061417 | 319 Sloan Street - Location 6 | AA | G5 | 8:32 | 15:32 | 420 | 11.40 | 11.34 | 11.37 | 4775.4 | 0.00072 | 0 | <0.00036 |

Notes:

<: Less than
AA: Area air sampling
DA: Davidson Asbestos
f/cc: Fibers per cubic centimeter
Id: Identification
l: Liters
lpm: Liters per minute
Min: Minutes
PCM: Phase contrast microscopy
PCME: Phase contrast microscopy equivalent
SS: Sloan Street
TEM: Transmission electron microscopy

# TABLE 2
# SOIL SAMPLING RESULTS
# DAVIDSON ASBESTOS
# DAVIDSON, MECKLENBURG COUNTY, NORTH CAROLINA

| Sample Id | Sample Location | Date Sampled | Type of Sample | Percent Asbestos Detected By Visual Estimate | Percent Asbestos Detected By Point Count* |
|---|---|---|---|---|---|
| DA-319SS-AS-061417 | 319 Sloan Street | 6/14/2017 | Composite (12 pt) | NAD | NAD |
| DA-315SS-AS-061417 | 315 Sloan Street | 6/14/2017 | Composite (5 pt) | <1 | Trace Chrysotile Asbestos |

*Modification of the method with regards to point counting shows a results of "Trace" where asbestos is observed, but no points land on an asbestos fiber.

Notes:

<: Less than
AS: Asbestos soil sample
DA: Davidson Asbestos
Id: Identification
NAD: No asbestos detected
pt: Point
SS: Sloan Street

## APPENDIX 3

**PHOTOGRAPHIC LOG**

(11 Pages)

**OFFICIAL PHOTOGRAPH NO. 1**
**U.S. ENVIRONMENTAL PROTECTION AGENCY**

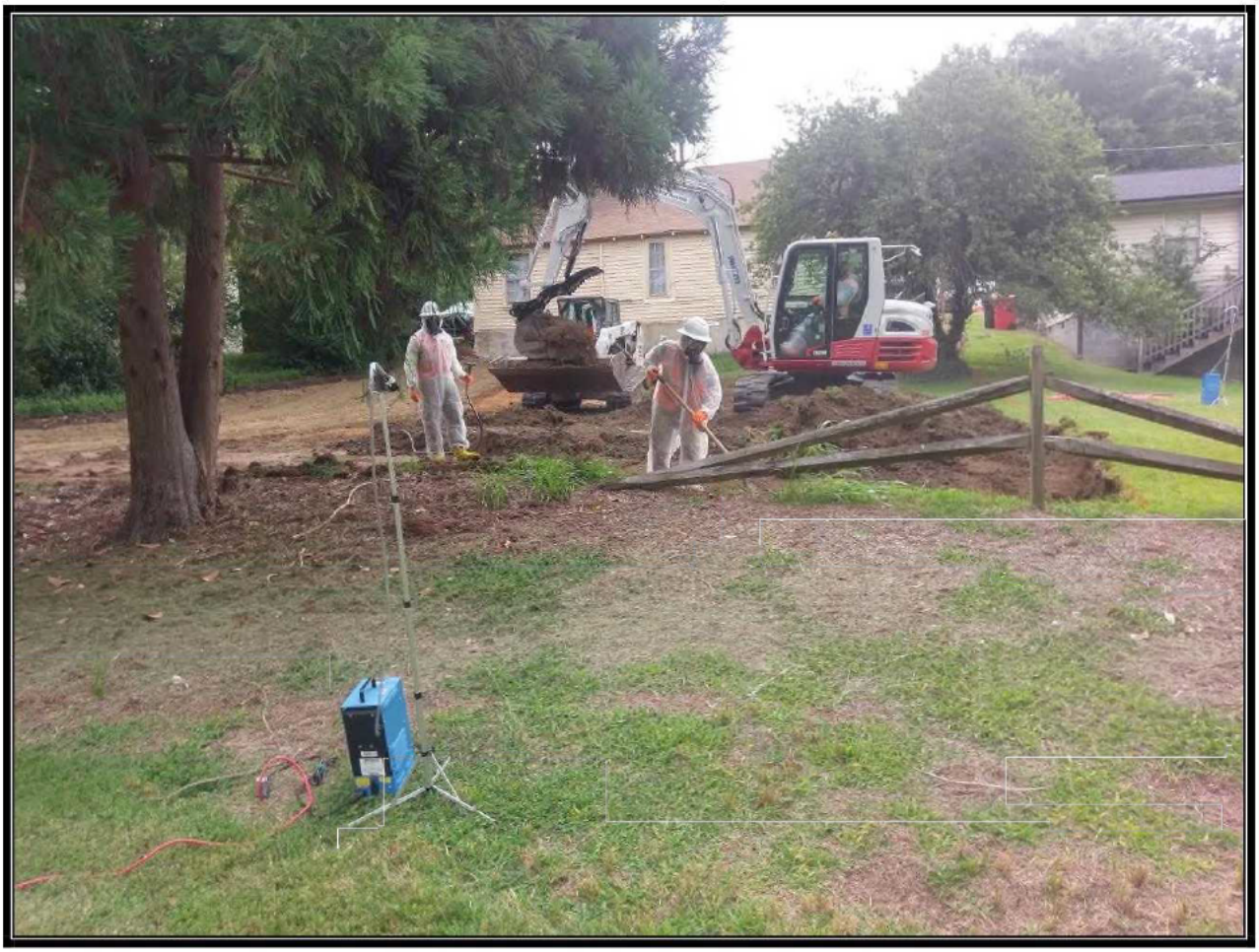
| | | | |
|---|---|---|---|
| **TDD Number:** | TT-01-071 | **Location:** | Davidson Asbestos |
| **Orientation:** | Southeast | **Date:** | June 13, 2017 |
| **Photographer:** | Paul Prys, Tetra Tech, Inc. (Tetra Tech) | **Witness:** | None |

**Subject:** The Emergency and Rapid Response Services (ERRS) contractor, Environmental Restoration, LLC (ER), used an excavator and hand tools to remove asbestos-containing materials (ACM) and asbestos-contaminated soil from the property located at 319 Sloan Street. ER used hoses to wet the asbestos-contaminated soil and spread plastic sheeting under the dump trucks to prevent asbestos-contaminated soil from falling onto the sidewalk and the road during removal activities.

**OFFICIAL PHOTOGRAPH NO. 2**
**U.S. ENVIRONMENTAL PROTECTION AGENCY**

| | | | |
|---|---|---|---|
| **TDD Number:** | TT-01-071 | **Location:** | Davidson Asbestos |
| **Orientation:** | North | **Date:** | June 14, 2017 |
| **Photographer:** | Paul Prys, Tetra Tech, Inc. (Tetra Tech) | **Witness:** | None |

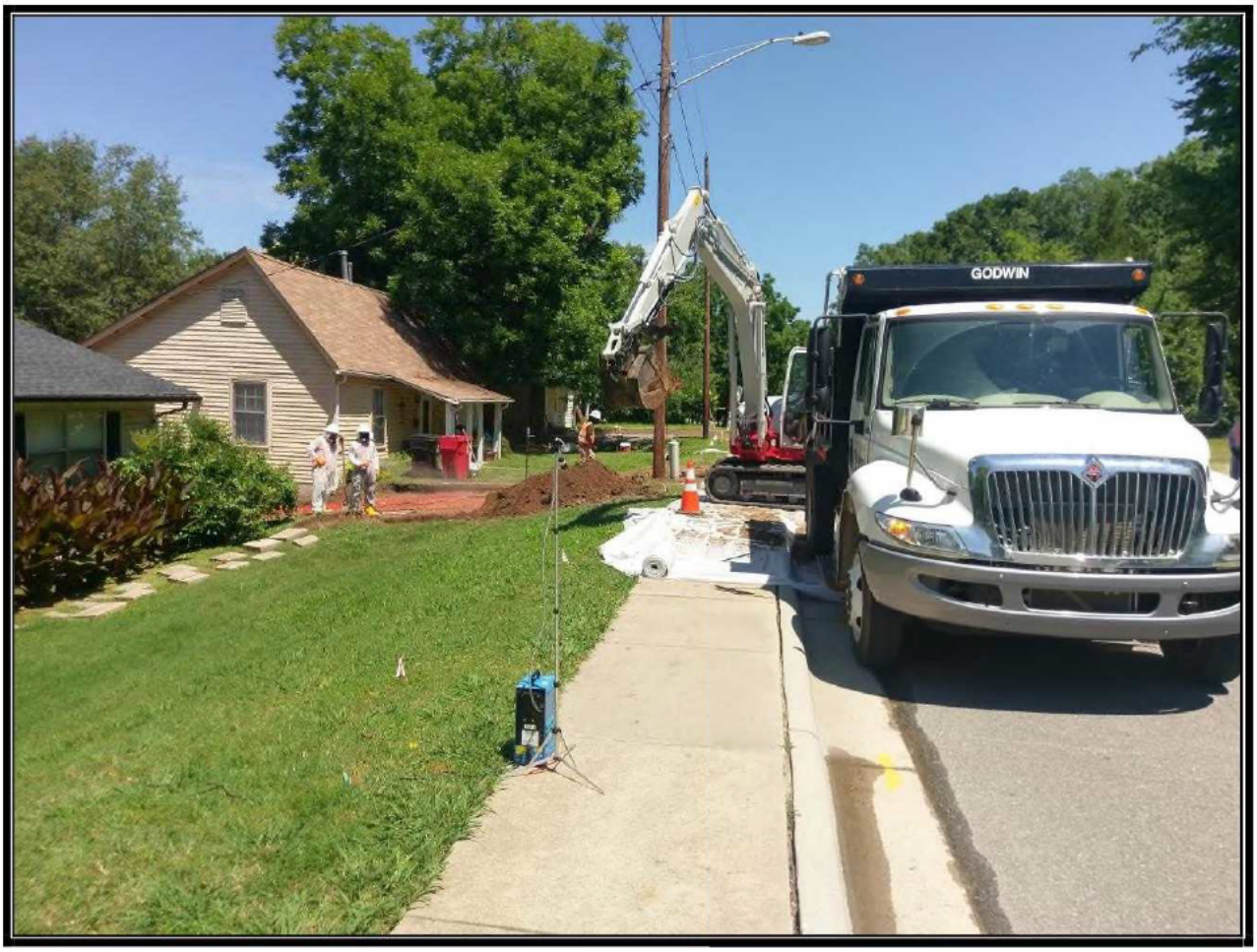
**Subject:** ER used an excavator and hand tools to remove ACM and asbestos-contaminated soil from the property located at 315 Sloan Street. ER used hoses to wet the asbestos-contaminated soil during removal activities.



**OFFICIAL PHOTOGRAPH NO. 3**
**U.S. ENVIRONMENTAL PROTECTION AGENCY**

| | | | |
|---|---|---|---|
| **TDD Number:** | TT-01-071 | **Location:** | Davidson Asbestos |
| **Orientation:** | East | **Date:** | June 13, 2017 |
| **Photographer:** | Paul Prys, Tetra Tech | **Witness:** | None |

**Subject:** Perimeter air sampling was conducted by a Tetra Tech Superfund Technical Assessment and Response Team (START), State of North Carolina-accredited air monitor to evaluate the effectiveness of engineering and safety controls in preventing off-site migration of asbestos fibers during removal activities at 319 Sloan Street.




**OFFICIAL PHOTOGRAPH NO. 4**
**U.S. ENVIRONMENTAL PROTECTION AGENCY**

| | | | |
|---|---|---|---|
| **TDD Number:** | TT-01-071 | **Location:** | Davidson Asbestos |
| **Orientation:** | North | **Date:** | June 14, 2017 |
| **Photographer:** | Paul Prys, Tetra Tech | **Witness:** | None |

**Subject:** Perimeter air sampling was conducted by a Tetra Tech START, State of North Carolina-accredited air monitor to evaluate the effectiveness of engineering and safety controls in preventing off-site migration of asbestos fibers during removal activities at 315 and 319 Sloan Street.

**OFFICIAL PHOTOGRAPH NO. 5**
**U.S. ENVIRONMENTAL PROTECTION AGENCY**

| | | | |
|---|---|---|---|
| **TDD Number:** | TT-01-071 | **Location:** | Davidson Asbestos |
| **Orientation:** | Southeast | **Date:** | June 13, 2017 |
| **Photographer:** | Paul Prys, Tetra Tech | **Witness:** | None |

**Subject:** ER installed snow fencing along the subsurface of the excavated back yard of 319 Sloan Street after the visual inspection conducted by Tetra Tech START, State of North Carolina-accredited asbestos inspector and air monitor detected no visible ACM in the excavated area.

**OFFICIAL PHOTOGRAPH NO. 6**
**U.S. ENVIRONMENTAL PROTECTION AGENCY**

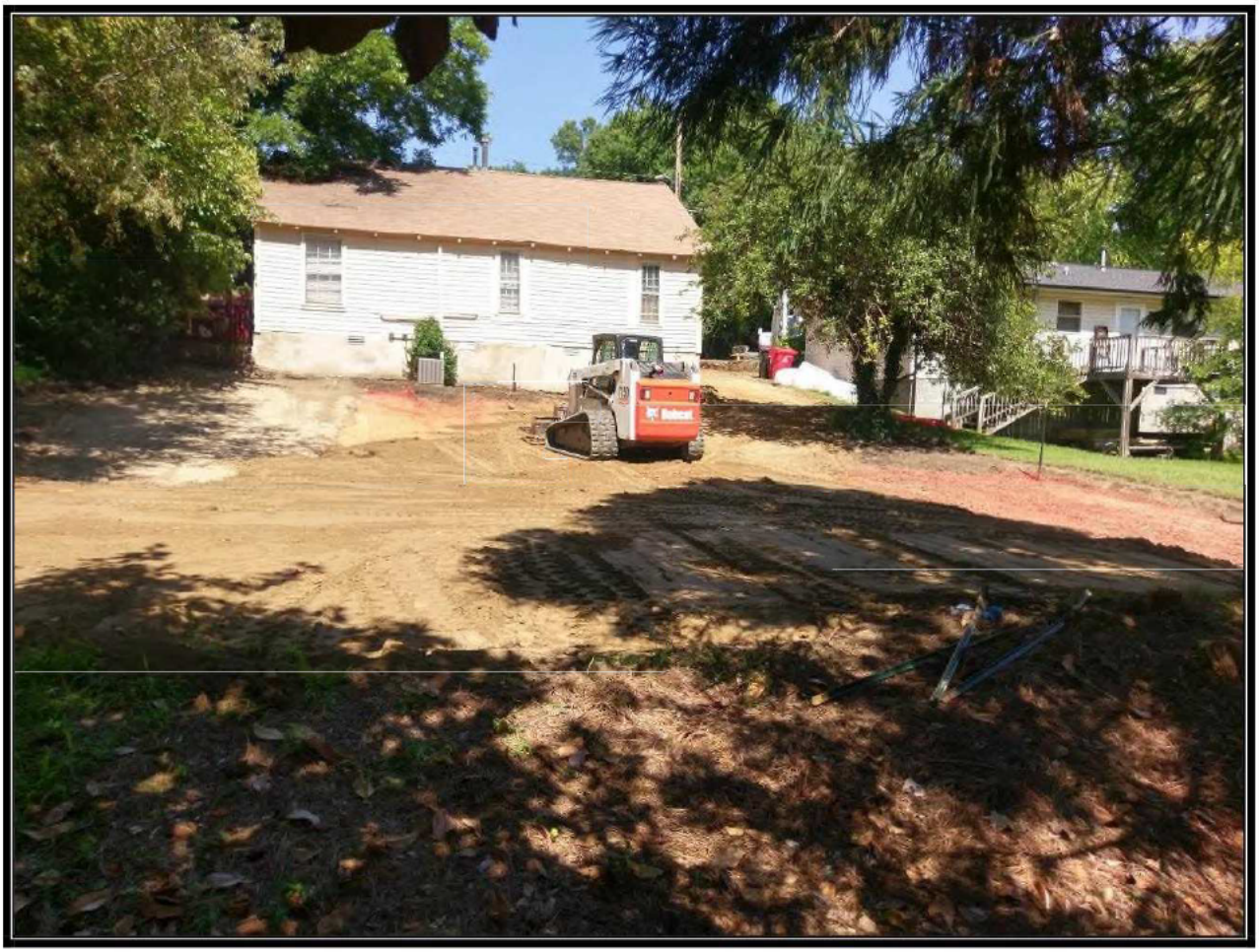
| | | | |
|---|---|---|---|
| **TDD Number:** | TT-01-071 | **Location:** | Davidson Asbestos |
| **Orientation:** | West | **Date:** | June 14, 2017 |
| **Photographer:** | Paul Prys, Tetra Tech | **Witness:** | None |

**Subject:** ER installed snow fencing along the subsurface of the excavated driveway of 319 Sloan Street after the visual inspection conducted by Tetra Tech START, State of North Carolina-accredited asbestos inspector and air monitor detected no visible ACM in the excavated area.

**OFFICIAL PHOTOGRAPH NO. 7**
**U.S. ENVIRONMENTAL PROTECTION AGENCY**

| | | | |
|---|---|---|---|
| **TDD Number:** | TT-01-071 | **Location:** | Davidson Asbestos |
| **Orientation:** | Not applicable | **Date:** | June 14, 2017 |
| **Photographer:** | Paul Prys, Tetra Tech | **Witness:** | None |

**Subject:** A Tetra Tech START, State of North Carolina-accredited asbestos inspector and air monitor visually inspected the excavated driveway of 315 Sloan Street for the presence of visible ACM. ER removed additional soil in the driveway to a depth of 24 inches, but ACM was visible along the sides of the excavation. Snow fencing was installed on the subsurface and along the sides of the excavated driveway to identify the depth of the excavation and the presence of ACM.



**OFFICIAL PHOTOGRAPH NO. 8**
**U.S. ENVIRONMENTAL PROTECTION AGENCY**

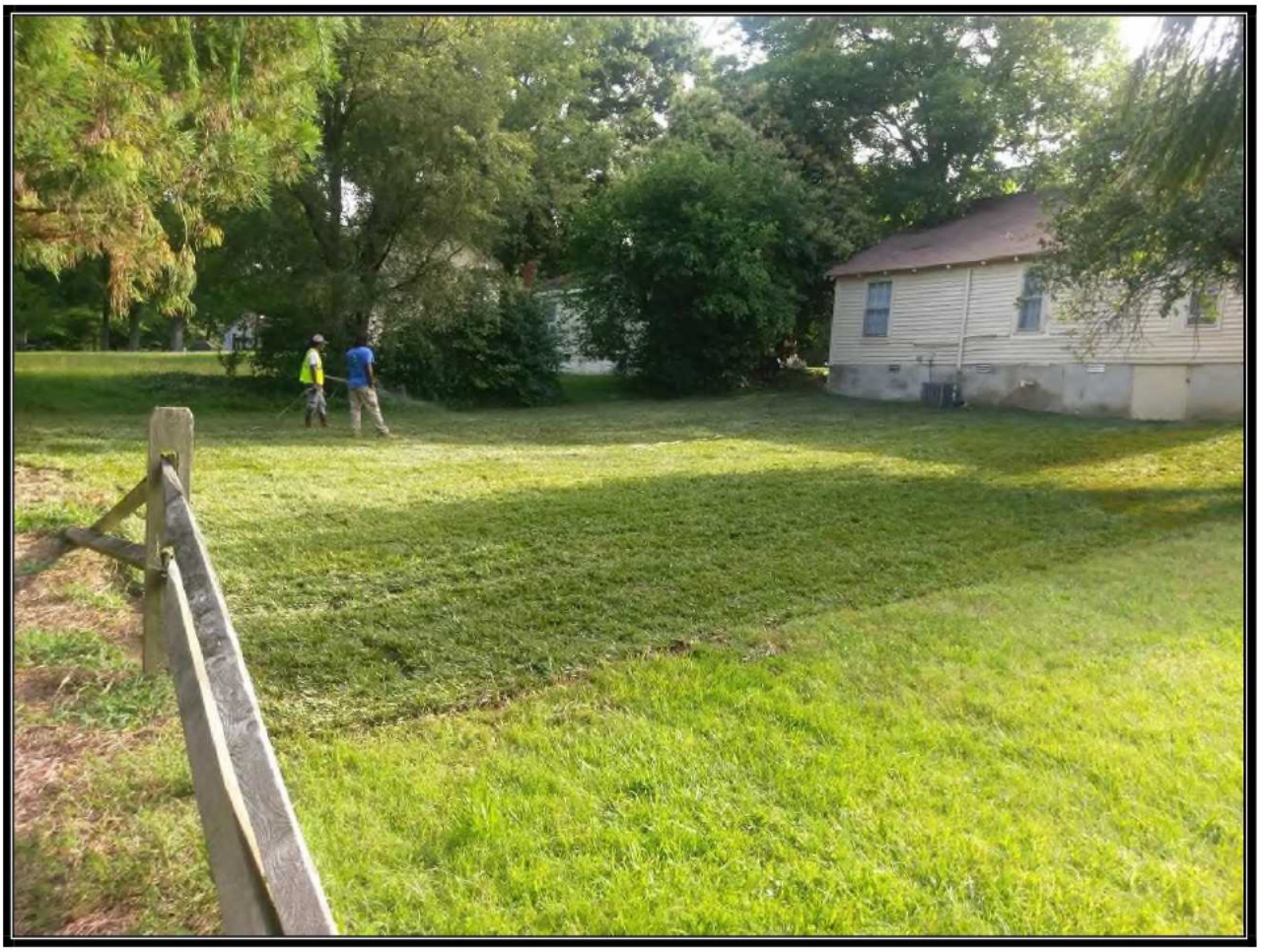
| | | | |
|---|---|---|---|
| **TDD Number:** | TT-01-071 | **Location:** | Davidson Asbestos |
| **Orientation:** | East | **Date:** | June 14, 2017 |
| **Photographer:** | Paul Prys, Tetra Tech | **Witness:** | None |

**Subject:** ER used dump trucks and skid steers to install backfill in the excavated areas of 315 and 319 Sloan Street.

**OFFICIAL PHOTOGRAPH NO. 9**
**U.S. ENVIRONMENTAL PROTECTION AGENCY**

| | | | |
|---|---|---|---|
| **TDD Number:** | TT-01-071 | **Location:** | Davidson Asbestos |
| **Orientation:** | Northeast | **Date:** | June 15, 2017 |
| **Photographer:** | Paul Prys, Tetra Tech | **Witness:** | None |

**Subject:** ER used dump trucks, skid steers, and rakes to install topsoil in the excavated back yard of 319 Sloan Street.



**OFFICIAL PHOTOGRAPH NO. 10**
**U.S. ENVIRONMENTAL PROTECTION AGENCY**

| | | | |
|---|---|---|---|
| **TDD Number:** | TT-01-071 | **Location:** | Davidson Asbestos |
| **Orientation:** | Northeast | **Date:** | June 16, 2017 |
| **Photographer:** | Paul Prys, Tetra Tech | **Witness:** | None |

**Subject:** ER installed sod in the excavated back yard of 319 Sloan Street after backfill and topsoil were installed.

**OFFICIAL PHOTOGRAPH NO. 11**
**U.S. ENVIRONMENTAL PROTECTION AGENCY**

| | | | |
|---|---|---|---|
| **TDD Number:** | TT-01-071 | **Location:** | Davidson Asbestos |
| **Orientation:** | Northwest | **Date:** | June 16, 2017 |
| **Photographer:** | Paul Prys, Tetra Tech | **Witness:** | None |

**Subject:** ER installed rock in the excavated driveways at 315 and 319 Sloan Street after backfill was installed.