

**Response to Public Comments on Interim Risk Management Plan  
For the BB&T Site (DSCA Site #32-0013)  
1103 W. Club Blvd, Durham, NC**

The DSCA Program held a 45-day public comment period from February 27, 2011 to April 13, 2011, to allow interested parties to provide comment on the proposed Interim Risk Management Plan (IRMP) for the BB&T Site (DSCA site # 32-0013) in Durham, NC. The objectives of the IRMP are to demolish the building on the property and impose land use restrictions to control exposure to contamination. The purpose of building demolition is to ensure that the building no longer poses an indoor air risk and to allow access for completion of soil contamination assessment in preparation for the next phase of remediation.

Public comments related to the IRMP are shown below (in **bold**) with a DENR response following the comment(s). Similar comments are grouped together. The original wording of each comment is included, and where necessary, clarification has been added in square brackets [ ]. For comments unrelated to the IRMP, a brief synopsis of each comment and DENR's response to each comment is provided.

**Comments Received:**

1. **As a resident, I request that at least a 48-hour notice be given before the building is demolished. This notice should be given to TPNA [Trinity Park Neighborhood Association].**
2. **I would like to be notified at least 48 hours in advance of when work will start on the building demolition.**
3. **I believe that it is reasonable for DENR to provide all residents, businesses and churches in area (including DATA bus riders) a minimum notice of 7 days before asbestos removal and demolition work begins at the site.**

DENR Response: Based on these comments, Section 6.4 of the Interim Risk Management Plan (IRMP) will be updated to include the following:

*At least two weeks prior to the scheduled demolition, all residents within and contiguous to the contamination plume, as well as TPNA, DATA, and interested parties that have provided contact information, will be notified of the dates of the demolition. In addition, notices will be posted to the subject building and adjacent bus stop. Prior to the demolition, questions regarding the Interim Risk Management Plan can be directed to Billy Meyer at 919-508-8415. Questions specific to the demolition procedures should be directed to Chan Bryant, project manager with Withers & Ravenel, at 919-469-3340.*

4. **I would like to see more monitoring (ambient air and vapor) done after the demolition to account for any unplanned or unforeseen circumstances that might impact the safety of the site and surrounding area.**
5. **As a resident, I request that air monitoring of the demolition site be performed:**
  - **During the demolition**
  - **The day after the demolition**
  - **One week after the demolition**

- One month after the demolition.

6. I request that results of that [post-demolition] monitoring be reported immediately and electronically to TPNA
7. I further request that immediate corrective action be taken and reported to TPNA if the level of contaminants in the air increases in any amount over the pre-demolition level.
8. The residents, businesses, churches and affected neighborhoods should be provided detail of what, if any, screening will occur for ambient air/perc levels at the site, both pre- and post-demolition. Such screening is necessary and warranted given the known perc levels. If a problem arises during the demolition (such as unacceptable levels of contamination into the air) there should be a way to inform residents, businesses and churches in a timely manner.
9. I am concerned about notifying people. There are a number of rental properties on Watts St and even more on Buchanan Blvd. Renters need to be informed. I would not rely on the property owners to let their renters know that there is/are problems. In addition to informing residents, there are a number of small businesses and churches that operate within one to two blocks of the BB&T site that should be notified. How will the residents and I would add businesses be notified if/when there is “sustained ambient readings show an increase in ambient air greater than 10 parts per million over background?” (6.43. Vapor Monitoring Plan p. 21) I do not believe that having “resident... limit their time outdoors to minimize exposure to vapors associated with the work” (6.43. Vapor Monitoring Plan p. 21) is sufficient to protect peoples’ health and safety.

DENR Response: During and immediately after the building demolition, air monitoring and notification to affected property owners/occupants will be performed as described in the IRMP. Based on our experience, DSCA does not expect to find elevated outdoor air concentrations from demolition activities; however, based on the comments received, the Vapor Monitoring Plan (Section 6.4.3) of the IRMP will be updated to include the following post-demolition monitoring:

*Following the demolition, holes and/or penetrations in the asphalt and concrete will be patched to minimize the emission of vapors from soil. Seven days after any repairs to the asphalt or concrete, the ambient air on the property and at the property boundaries will be monitored and results compared to the 10 parts per million over background conditions (i.e., the standard used during demolition). While not anticipated, if this monitoring exceeds 10 parts per million over background conditions at the property boundaries, the affected property owners/occupants will be notified immediately, and measures will be undertaken to ensure that vapors from the site do not exceed acceptable levels.*

*If this monitoring does not exceed 10 parts per million over background, then an ambient air sampler will be deployed on site for 14 days. After 14 days, the sampler will be analyzed and the results will be compared to the N. C. Division of Air Quality’s Acceptable Ambient Levels, or AALs, which are established to protect surrounding properties from chemical vapors from a source. For perc, the AAL is 190 ug/m<sup>3</sup>. Fencing around the site will remain in place until the AALs are confirmed to be below 190 ug/m<sup>3</sup>.*

To address the comment about providing records of all monitoring to the community, the IRMP will be updated to include the following:

*After the demolition and related monitoring activities have been completed, a summary report will be prepared. This report will include a summary of the demolition, a description and justification of deviations from the IRMP, results of demolition-related monitoring, a summary of the disposition of building materials, and any other pertinent information.*

- 10. Finally, I question the decision to demolish the building without removing the contaminated soil. Given that cement is porous, such demolition could increase the amount of Perc. being vented into our neighborhood. The building has already been condemned. Leave it in place until DENR is prepared to remediate the site.**

DENR Response: The comment is acknowledged; however, as described in the Interim Risk Management Plan, demolition of the building is necessary to fully assess the extent of source soil contamination prior to soil remediation.

- 11. I believe it is reasonable to provide the public with the state and federal asbestos rules and regulations that apply to this project. (6.2 Asbestos Inspection & Abatement, p. 17) I propose that residents and business owners and staff receive seven days advance written notice prior to the asbestos being removed, which would include the original date for removal and if/when there is/are any revisions. I am concerned not only about visible asbestos emissions but emissions that are not visible. (6.2 Asbestos Inspection & Abatement, p. 18).**

DENR Response: The asbestos abatement will be conducted as described in Section 6.2 of the IRMP. Abatement procedures before, during, and after are prescribed by the Health Hazards Control Unit (HHCU) of the N. C. Department of Health and Human Services. Additional information about asbestos abatement can be found at <http://www.epi.state.nc.us/epi/asbestos/forms.html>, or by calling the HHCU at (919) 707-5950.

- 12. I believe that the demolition contractor's health and safety plan should be made available to public not only for their review but also to make comments and/or recommendations.**

DENR Response: The demolition contractor is responsible for ensuring that they comply with the NC OSHA health and safety requirements for the protection of their employees and anyone accessing the site.

- 13. I believe it would be prudent for all lanes of Club Boulevard to be rerouted for vehicular access during the removal of asbestos and the demolition. The health & safety of the pedestrians dictates that the sidewalks be closed for pedestrian traffic. (6.41. Limitation of Pedestrian Access to Property p. 20) I believe the drivers should not be exposed, or be exposed as little as possible to asbestos, dry cleaning chemicals and particulate materials. One method that would decrease their exposure is if they drove on streets that were not right at site while the removal of the asbestos and particulate materials was occurring.**

DENR Response: Asbestos abatement will be completed prior to demolition and post-abatement air monitoring will ensure that the public is not exposed to asbestos from the building. Vehicles and pedestrians pass the site in such a brief time frame that any exposure to perc vapors is extremely small; consequently, re-routing the

pedestrian or vehicular traffic along W. Club Boulevard in the vicinity of the site is not expected to be necessary. However, a final decision on traffic patterns will be made by the City of Durham in consultation with DENR.

- 14. Therefore for the health & safety of the bus riders I believe that it is reasonable for the DATA bus stops on either side of Club Blvd to be closed and temporarily relocated during the asbestos removal and demolition of the BB&T building.**

DENR Response: DATA will be posting a notice at the bus stop informing riders that the building is to be demolished; and that they may choose to use an alternate bus stop.

- 15. It is imperative that all cracks, etc. in the slab be repaired in order to prevent and/or minimize releases to the environment and to make the slab a more effective contaminant cap.**

DENR Response: As noted in the response to comments #4 through #9 above, the IRMP will be amended to address sealing the asphalt and concrete following the building demolition.

- 16. Parts of the building contain dry-cleaning chemicals and given this I would like to see the remains of the building taken to landfills that are designed to handle such toxic materials and not the landfill currently used by Durham County that is designated to accept household and hazardous wastes. The Interim RMP says that "all building materials generated during the demolition activities will be transported to a permitted solid waste facility of recycling and/or disposal. (6.4.5 Disposal of Building Debris & Materials p. 21) Using local landfills is unacceptable to me.**

DENR Response: Building debris will be disposed of in accordance with applicable state and federal regulations as described in Section 6.4.5 of the IRMP.

- 17. Consideration of paved/concrete areas on site vs. landscaped and "green" areas – the RMP calls for landscaped areas, walkways, green space, etc. on the site following demolition. Consideration in terms of health & safety should be given as to how much of the site ends up as "green space" vs. paved or cemented in order to have an adequate "cap" to prevent future and on-going release of perc vapors into the surrounding air. Despite the customary desire for more green space and natural areas, in this instance, perhaps less is better than more.**

DENR Response: Comment acknowledged. Following demolition, the sealing of the asphalt and concrete will help ensure an effective cap prior to the source area remediation activities.

#### **Summary of Comments unrelated to the IRMP:**

1. Comments were received requesting that site summary reports, site management plans, and status updates be provided.

DENR Response: Due to the community interest in the BB&T site, updates of the site's status will be provided at least quarterly and posted at DSCA's website [www.ncdsca.org](http://www.ncdsca.org). DSCA will work with our public information officer to help ensure that the updates are understandable to the general public. The updates will include brief

summaries of results, planned activities, and estimated schedules. We are in the process of developing the status update format and a web “repository” to store site reports that can be accessed by the public. DSCA will continue to communicate with the Trinity Park Neighborhood Association and any other interested parties that have provided contact information. Members of the public are encouraged to contact the DSCA project manager, Billy Meyer, at 919-508-8415 or [billy.meyer@ncdenr.gov](mailto:billy.meyer@ncdenr.gov) with questions or to request information.

2. Comments were received that disagreed with the use of risk-based procedures for site remediation.

DENR Response: The perspective posed by the commenter is acknowledged. The Dry-Cleaning Solvent Cleanup Act of 1997 mandates that a risk-based approach be used to remediate contaminated dry-cleaning sites (NCGS 143-215.104). The Environmental Management Commission approved the DSCA risk-based rules (15A NCAC 02S) in 2007.