

Clayton County HD Building September 25, 2006

Introduction

The Clayton County Commission purchased property in Jonesboro, GA for use as the District 3-3 Health Department office building. Because the property was formerly an industrial facility, extensive renovation was required and the Chemical Hazards Program (CHP) was asked to conduct a preliminary investigation of potential hazardous chemical exposure pathways based on the historical industrial use of the property.

Site History

A title search showed that the property was first deeded to Atlanta Wire Works, Inc. in 1969 and operated as Atlanta Felt, Inc. from 1980 to 1991. Atlanta Wire Works, Inc. merged with the JWI Group, Inc. in 1991 [comprised of Atlanta Northern Wire (PA); Johnson Filaments (VT); Johnson Foils (MA), and Drytex, Inc. (GA)] and operated as Atlanta Wire Works. In 1999, two companies — Asten and JWI Group, Inc. — merged to become Asten Johnson. Both companies started in Europe and have long histories. Now, Asten Johnson is the second-largest paper machine clothing manufacturer in North America. In 2003, Asten Johnson sold the facility to Clayton County.

Because this facility was once an industrial facility, CHP looked into whether it had ever held any environmental permits or was regulated by federal or state authorities. Under the Resource Conservation and Recovery Act of 1976 (RCRA), hazardous wastes are controlled by federal and state authorities from "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. The 1986 amendments to RCRA address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. Under the laws of RCRA, industries maintain a comprehensive and accurate historical record of facility operations regarding hazardous materials use.

According to the Georgia Environmental Protection Division (GEPD) and the U.S. Environmental Protection Agency (EPA), the facility did not hold a federal identification number, meaning that no owners were a regulated generator of hazardous waste. However, they

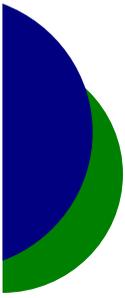
could have been a Conditionally Exempt Small Quantity Generator of hazardous waste (less than 220 pounds per month), in which case, they would not need a federal identification number. Based on building structure, function, and location, there is no evidence to suggest that any hazardous waste was generated during operations. The GEPD Air Protection Branch has never issued an Air Emissions Permit to any company that occupied the site. Furthermore, GEPD's Underground Storage Tank (UST) Branch stated that the location has never had a UST. Finally, the GEPD Watershed Protection Branch has never issued a wastewater discharge permit at this location.

During the late 1990s, Atlanta Wire Works had a Georgia Radioactive Materials license and a U.S. Nuclear Regulatory Commission (NRC) license to operate a portable gauge that contained a sealed radioactive source. The gauge was used to test equipment. According to Georgia Radioactive Materials Program staff, in 1998 they issued one Notice of Violation for performing late leak tests. Leak tests are required, precautionary procedures only. No radioactive material releases or exposures occurred. The last inspection of the facility under the state license was conducted by the state in 1998, and the license was then terminated.

Under the federal NRC license, an inspection was conducted by the NRC in January 2000. Based on the results of this inspection, the NRC determined that two violations of license requirements occurred:

- The failure to notify the NRC of a field storage location change (in Indiana).
- The failure to obtain NRC consent in writing prior to the transfer of the license from JWI Group to Asten Johnson.

After careful consideration of the specific circumstances in this case, the NRC decided not to pursue escalated enforcement action because there were no changes to personnel procedures or the radiation safety program, such that public health and safety were negatively impacted as a result of this change of ownership. These



CHEMICAL HAZARDS PROGRAM
Environmental Health Branch
Georgia Department of Community Health
Atlanta, GA



issues were resolved and the federal license was terminated in August 2000.

In response to CHP's investigation, the Georgia Radioactive Materials Program stated that there are no safety or security concerns regarding radioactive materials historically used on the facility property, and that all radioactivity containing devices were properly removed from the facility prior to the final license termination in 2000.

In October 2002, contractors for Clayton County published a Phase 1 Environmental Site Assessment report. This report was examined and found to be thorough and complete as conducted under appropriate guidelines; however, there is one item of concern: the report states that the Materials License Tracking System maintained by NRC did not identify the site as holding an NRC license. This is in error, as described above.

During renovations conducted in May 2003, a survey indicated the presence of both lead and asbestos. The renovation contractor issued a letter stating that all lead and asbestos-containing materials were completely abated following state and federal abatement procedures. In August 2006, staff from the state and district health offices conducted an abbreviated walk through of the premises, during which time several areas reflecting the buildings prior industrial uses were observed including the gross appearance of what appeared to be remnants of asbestos-insulated pipes.

Conclusions

Results of this environmental regulatory and health investigation do not warrant further exposure or risk assessments regarding past operations conducted at this location.

Recommendations

- Because there appear to be remnants of asbestos-containing pipe insulation in some remote building locations, an inspection should be conducted by GEPD to ensure that all asbestos-containing materials have been properly abated.
- Based on site geology information summarized in the Phase 1 Assessment, the underlying substrata would indicate a higher risk for radon gas. A radon gas test should be conducted by a licensed contractor.