JOSH STEIN
Governor
D. REID WILSON
Secretary
MICHAEL SCOTT
Director

NORTH CAROLINA
Environmental Quality

February 24, 2025

Blake Mills, Public Utilities Director
Chatham County Public Utilities
964 East Street
Pittsboro, NC 27312

RE: Voluntary Clean-up of Lead Paint
Bynum Water Tank
162 Bynum Hill Road
Pittsboro NC 27312
Chatham County
EPA ID # NCR000187476

Dear Mr. Mills:

On June 10, 2024, Jenne Walker Hughes, an inspector with the North Carolina Department of Environmental Quality's Hazardous Waste Section (HWS) responded to a request for assistance from Chatham County Public Utilities to Bynum Water Tank, a part of Earl Thompson Park and Community Gardens. Chatham County had hired a contractor (Boles Restoration) to prepare the historic tank for preservation by painting/encapsulation. The contractor was expected to remove old lead-based paint by grinding/scraping the tank surface, power washing the tank, then repainting/encapsulating the tank. During the contractors initial grinding of the tank surface on May 20, 2024, concerned citizens filed complaints with Chatham County over concerns uncontrolled lead dust that was being generated during the process was airborne and settling on their property. Work on the tank was halted the next morning and access to the site was restricted. Chatham County officials contacted NC DHHS Health Hazards Control Group for guidance and contacted the EI Group to perform testing at the site. EI Group collected soil samples on May 22, 2024, that indicated possible contamination by Lead and Chromium. Following a review of the lab results, Chatham County then reported the incident to the Hazardous Waste Section, requested guidance, and indicated they would perform any necessary sampling assessment voluntarily. Richard Concepción, an Environmental Chemist with the HWS, followed up an on-site meeting between HWS staff and Chatham County staff held on June 10, 2024, with an email requesting additional information as well as further action that included submission of an Initial Site Sampling Plan (ISSP) to delineate the character and extent of the contamination released during the incident.

An Initial Site Sampling Plan (ISSP) dated August 21, 2024, was submitted by Pyramid Environmental & Engineering on behalf of Chatham County to the HWS for approval. Following approval from

NCDEQ/HWS, Pyramid Environmental & Engineering representatives were observed onsite September 18th, 19th, and 20th, 2024, collecting soil samples for analysis as described in their approved ISSP. During the same sampling dates, five (5) discrete site-specific background samples were collected to establish site-specific natural metal concentrations in soils. These background levels may be used as alternative cleanup levels in lieu of the values in the preliminary soil remediation goals.

The HWS has reviewed the December 4, 2024, Remedial Investigation Report, prepared by Pyramid Environmental & Engineering on behalf of Chatham County Public Utilities. The report summarized analytical results from the September 18th, 19th, and 20th, 2024, sampling dates. Laboratory analysis of the samples indicated constituent concentrations for Barium, Cadmium, Lead, Silver & Mercury were under the North Carolina Preliminary Soil Remediation Goal (PSRG). For the elements of Arsenic, the mean value for the background results of 2.89 mg/kg and Hexavalent Chromium, background results of 0.41 mg/kg were used as the clean-up standard instead of values found under the PSRG table. Both metals were considered naturally occurring in this region. All leachate values presented in this report determined that the areas of concern were not a hazardous waste. The HWS concurs with the consultants' recommendation that at least 6-inches of soil and gravel should be removed from around the tank in Decision Unit 1 and the soil in the community garden beds located in Decision Unit 6. All soil should be disposed of in a lined solid waste landfill. You may use a copy of the completed TCLP in the areas of concern for disposal of the soil as non-hazardous at the selected solid waste landfill. Please provide the Hydrogeologist and the inspector with a copy of the Bill of Lading for the soil disposal. The HWS finds that *no further action* is required at this time in the area impacted.

This letter only applies to the Decision Units and samples taken from neighboring residences as identified in the revised Work Plan dated August 2024, approved by NCDEQ on August 26, 2024, and completed over the course of three days on September 18th, 19th, and 20th that were assessed. It is not applicable to any other areas of potential contamination at the site, contamination that may be discovered in the future, or other areas where hazardous waste is managed at this site.

If you have any questions concerning this matter, please contact Rose Pruitt, Eastern Region Hydrogeologist, at (919) 270-3476 or Rose.Pruitt@deq.nc.gov.

Sincerely,

Rose Pruitt

Rose Pruitt, Eastern Region Hydrogeologist
Hazardous Waste Section
Division of Waste Management, NCDEQ

ec: Mike Jones, Pyramid Environmental & Engineering
Richard Concepción, Eastern Region Compliance Supervisor – NCDEQ HWS
Jenne Walker Hughes, Environmental Specialist II – NCDEQ HWS
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