

\*586SERBSF10,634\*

\*586SERBSF10,634\*

Site Name (Subject): TRYON STREET U-HAUL

Site ID (Document ID): NC0001290667

Document Name (DocType): Correspondence (C)

Report Segment:  
Description: General Correspondence

Date of Document: 9/29/1999

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Access Level: PUBLIC

Division: WASTE MANAGEMENT

Section: SUPERFUND

Program (Document Group): SERB (SERB)

Document Category: FACILITY

Print Report for  
Record

Go to New  
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(default to last  
record values)

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EPA ID: NC0001290667 Site Name: TRYON STREET UHAUL SITE

State ID:

Alias Site Names:

City: CHARLOTTE

County or Parish: MECKLENBURG

State: NC

Refer to Report Dated: 09/27/1999

Report Type: PRELIMINARY ASSESSMENT 001

Report Developed by:

**DECISION:**

1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:

1a. Site does not qualify for further remedial site assessment under CERCLA (No Further Remedial Action Planned - NFRAP)

1b. Site may qualify for action, but is deferred to:

2. Further Assessment Needed Under CERCLA:

2a. Priority:  Higher  Lower

2b. Other: (recommended action) NFRAP (No Further Remedial Action Planned)

**DISCUSSION/RATIONALE:**

The site consisted of 47 drums discovered in the back of a U-haul. Removal responded and disposed of the drums. One person noted less than a gallon of liquid had spilled from the truck onto the pavement. No media were impacted at the site.

Site Decision Made by: JENNIFER WENDEL

Signature: \_\_\_\_\_

Date: 09/29/1999

NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT

September 27, 1999



JAMES B. HUNT JR.  
GOVERNOR

WAYNE MCDEVITT  
SECRETARY

WILLIAM L. MEYER  
DIRECTOR

Ms. Jennifer Wendel  
NC Site Management Section  
US EPA Region IV Waste Division  
61 Forsyth Street, 11th Floor  
Atlanta, Georgia 30303

Subject:       Abbreviated Preliminary Assessment  
                  Tryon Street U-Haul Site  
                  NCO 001 290 667  
                  Charlotte, Mecklenburg County, North Carolina

Dear Ms. Wendel:

This report contains the findings of the Abbreviated Preliminary Assessment (APA) of the Tryon Street U-Haul Site located at 1224 N. Tryon Street in Charlotte, Mecklenburg County, North Carolina. The latitude and longitude worksheet (Reference #1) shows the location of the site on the USGS Topographic map.

The North Carolina DENR Superfund Section conducted the APA to assess the potential threat posed by the site to human health and the environment and to collect information to support a decision regarding the need for further action under CERCLA/SARA. This assessment consisted of telephone communications with parties involved with the site, file reviews and review of the "action memorandum" completed by the US EPA Removal Coordinator, OSC Michael Taylor (Reference #2).

**Site Description:**

The site is a commercial/private business property approximately five acres in size located along N. Tryon Street inside the city limits of Charlotte, NC. The area around the property and including the site consists of residential and commercial business uses. Located to the north of the site (within 1/8 mile) is the Southern Railroad switching yard, to the west of the site (within one mile) is Bethune School, to the south of the site (within one mile) are First Ward School, Alexander Street School, and Hawthorne Jr. High School, and to the east of the site (within one mile) is Villa Heights School.

Ms. Wendel  
September 27, 1999  
Page 2 of 3

**Removal Action:**

On October 20, 1995, the US EPA along with representatives from the FBI, and North Carolina Department of Environment and Natural Resources investigated the site and discovered forty-seven drums inside a U-Haul rental truck with various types of unknown liquid and solid wastes. Some of the drums had spilled some liquid in the back of the rental truck and at the time of the inspection a small amount (less than one gallon, estimated) had dripped from the back of the truck onto the pavement of the self-storage yard. No markings were present on the drums and the drums were screened for hazardous characteristics by the clean-up contractor. The drums were then consolidated and over packed for removal to an approved disposal facility for treatment. The landowner discovered the drums two weeks prior to the investigation when a subcontract towing service delivered the rental truck to the north Tyron Street location. The U-Haul storage site owner did not claim responsibility for the drums.

**Conclusion:**

Based on the information provided by OSC Taylor, US EPA Region IV, and information provided by Mr. Robin Hedden, former Waste Management Specialist with NC Hazardous Waste Section, the air and surface water pathways were threatened by the events at this site, but due to the removal action by the EPA and the clean-up contractor, these pathways were not impacted. Since the drums were properly managed during the removal action, and the waste materials properly managed and disposed of, the site today does not pose a hazard to public health or the environment. Therefore, the NC Superfund Section recommends that the site be assigned a disposition of "No Further Remedial Action Planned (NFRAP)" under CERCLA.

If you have any questions about the information provided, please contact me at 919-733-2801, extension. 290.

Sincerely,



Dan LaMontagne  
Environmental Engineer  
Superfund Section

Ms. Wendel  
September 27, 1999  
Page 3 of 3

Attachments

Lat./Long. Calculation Sheet (Ref. 1)  
Emergency Response Removal Authorization (Ref. 2)  
Delivery Order for Emergency Response Cleanup Services (Ref. 3)  
Procurement Request/Order dated 10/23/95 (Ref. 4)  
Phone Conversation Record (Ref. 5)  
APA Checklist

cc: Scott Ross, File  
Dan LaMontagne  
Charlotte Jesneck

Approved by: \_\_\_\_\_  
Jennifer Wendel, NC Site Management Section

Date: \_\_\_\_\_

LATITUDE AND LONGITUDE CALCULATION WORKSHEET #2  
LI USING ENGINEER'S SCALE (1/60)

SITE NAME: TRYON ST. U-HAUL SITE CERCLIS#: NC0 001 290 667

AKA: \_\_\_\_\_ SSID: \_\_\_\_\_

ADDRESS: 1224 NORTH TYRON ST

CITY: CHARLOTTE STATE: NC ZIP CODE: 28206

SITE REFERENCE POINT: CENTER OF SITE

USGS QUAD MAP NAME: CHARLOTTE EAST TOWNSHIP: \_\_\_\_\_ N/S RANGE: \_\_\_\_\_ E/W

SCALE: 1:24,000 MAP DATE: 1988 SECTION: \_\_\_\_\_ 1/4 \_\_\_\_\_ 1/4 \_\_\_\_\_ 1/4

MAP DATUM: 1927 OR 1983 (CIRCLE ONE) MERIDIAN: \_\_\_\_\_

COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 7.5' MAP (attach):

LONGITUDE: 80° 45' 00" LATITUDE: 35° 07' 30"

COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 2.5' GRID CELL:

LONGITUDE: 80° 47' 30" LATITUDE: 35° 12' 30"

CALCULATIONS: LATITUDE (7.5' QUADRANGLE MAP)

A) NUMBER OF RULER GRADUATIONS FROM LATITUDE GRID LINE TO SITE REF. POINT: 311

B) MULTIPLY (A) BY 0.3304 TO CONVERT TO SECONDS:  $A \times .3304 = 102.75$ "

C) EXPRESS IN MINUTES AND SECONDS (1' = 60"): 01' 42.75"

D) ADD TO STARTING LATITUDE: 35° 12' 30.00" + 01' 42.75" =

SITE LATITUDE: 35° 14' 12.75"

CALCULATIONS: LONGITUDE (7.5' QUADRANGLE MAP)

A) NUMBER OF RULER GRADUATIONS FROM LONGITUDE GRID LINE TO SITE REF. POINT: 340

B) MULTIPLY (A) BY 0.3304 TO CONVERT TO SECONDS:  $A \times .3304 = 112.34$ "

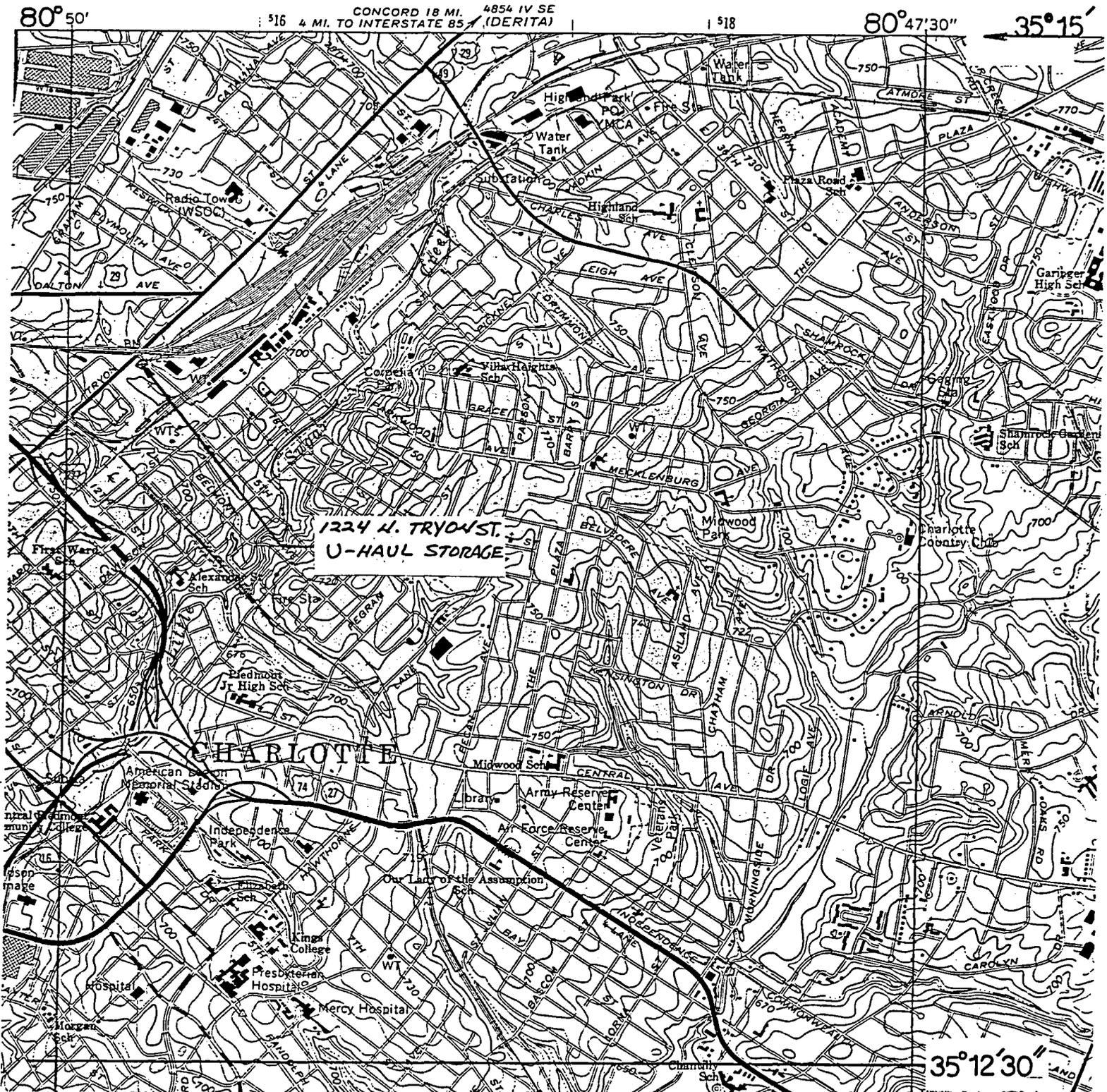
C) EXPRESS IN MINUTES AND SECONDS (1' = 60"): 01' 52.34"

D) ADD TO STARTING LONGITUDE: 80° 47' 30.00" + 01' 52.34" =

SITE LONGITUDE: 80° 49' 22.34"

INVESTIGATOR: Jim Barber

DATE: 8/18/99



TOPOGRAPHIC MAP QUADRANGLE NAME: CHARLOTTE EAST, N.C. SCALE: 1:24000.

COORDINATES OF LOWER RIGHT HAND CORNER OF 2.5 MINUTE GRID:

LATITUDE: 35° 12' 30"

LONGITUDE: 80° 47' 30"

ACTION-MEMORANDUM

SUBJECT: \$200K Emergency Response Removal Authorization for the Tryon Street U-Haul Site in Charlotte, Mecklenburg County, North Carolina

FROM: Michael Taylor, On-Scene Coordinator *met*  
Emergency Response and Removal Branch

TO: File

Site ID#:

I. PURPOSE

The purpose of this Action Memorandum is to document the emergency response action utilizing the On-Scene Coordinator's \$200K authority at the Tryon Street U-Haul Site. The conditions and circumstances this Site presents requires an immediate emergency response due to the threats posed to the public and environment. The emergency response and removal action described herein for the Tryon Street U-Haul Site, Charlotte, Mecklenburg County, North Carolina, is hereafter referred to as the "Site".

II. SITE CONDITIONS AND BACKGROUND

CERCLIS identification number:

Removal category: Emergency Response

The Emergency Response and Removal Branch (ERRB) received notification of this Site from EPA's Criminal Investigation Division (CID) on October 20, 1995. EPA's CID was notified by the Federal Bureau of Investigation (FBI) and the North Carolina Department of Environmental Health and Natural Resources (DEHNR) that an abandoned U-Haul truck was found containing leaking drums in the downtown area of Charlotte, North Carolina.

The manager of the local U-Haul center reported the abandoned drums after discovery by their subcontracted towing company that transports abandoned U-Haul vehicles back to the terminal. The abandoned truck was towed two weeks prior to the reported date of this incident. The truck held several drums of various unknown compounds that were leaking onto the truck bed and eventually onto the ground threatening local storm drains.

A. Site Description

1. Removal Site Evaluation

On October 20, 1995 ERRB responded to this incident with the FBI and NCDEHNR. The current facility is a U-Haul center located in the northern district of Charlotte, North Carolina. A 26 foot rental truck was parked on the property and contained 47 drums that were 55 and 85 gallons in size. Many of these drums were open and leaking their contents from the truck onto the ground. The rental truck floor was completely covered with the contents from the drums on board. Air monitoring revealed elevated levels of organic compounds.

The facility is a high traffic area with constant threats of direct contact. A fire and explosion threat existed with and potential contamination of surface areas that lead to local drain systems.

Initial site characterization and assessment revealed a variety of potential waste streams existed including: flammable liquids, acids, strong base and epoxy resins.

Several of the drums were badly corroded and rusted. Many were bent and missing bungs and lids to contain their contents. The area is prone to vandalism and is noted as a high crime area according local law enforcement.

The drums required immediate attention. The release of hazardous substances constituted a public health and environmental emergency. The State and local authorities did not have the resources to respond in a timely manner. The U-Haul center did not claim responsibility for these drums. This incident presented a fire and explosion threat in addition to a direct contact threat and exposure of toxic vapors.

2. Physical Location

The Site is located approximately five blocks from downtown Charlotte, North Carolina at 1224 North Tryon Street. The Site is located at the intersection of 16th street, which is immediately to the north of the Site. The Uptown homeless shelter is directly adjacent the property to the south, which also contains a medical clinic. A local retail store and chiropractic clinic is established to the west of the facility with Norfolk Southern's railyard to the east. Several residential dwellings are located within two blocks of the Site. The area is considered a high traffic zone. North Tryon street is a major thoroughfare into the downtown area. Interstate highways 77 and 277 are accessible within one half mile of the Site.

### 3. Site Characteristics

The Site is located on approximately five acres within the downtown area of Charlotte, North Carolina. The area is heavily populated and within walking distance of several tourist attractions and convention centers. More than 50,000 people live and work within a mile radius.

#### 4. Release or threatened release into the environment of a hazardous substance or pollutant or contaminant

Hazardous substances have been identified pursuant to CERCLA section 101(14). The hazardous wastes currently identified consist of the following Resource Conservation and Recovery Act (RCRA) waste codes: D001 (ignitable) and D002 (corrosive).

More than 6 wastestreams have been identified from this emergency response. The following categories list some of these wastestreams:

- A. Flammable Liquids
- B. Base Liquids
- C. Neutral Liquids
- D. Neutral Solids
- E. Hazardous Liquids
- F. PPE, Drums & Debris

The constant threat of fire, direct contact, emission of toxic fumes and vandalism are a major concern. A fire would release elevated levels of toxic emissions into the surrounding area and would directly affect the surrounding population.

Runoff to surface water would carry various waste and leaking organic waste contamination further into the local landscape and surface waters possibly contaminating local systems.

Trespassing and vandalism are concerns. Several incidents of vandalism and theft have occurred according to the site manager.

### 5. NPL Status

The Site is not listed on the NPL.

### 6. Maps, pictures and other graphic representations

Available upon request.

B. Other Actions to Date

1. Previous Actions

The FBI and NCDEHNR are investigating this incident for possible actions against the generators and transporters. This method of disposal is identified as a common occurrence and was reported two months prior with similar circumstances.

2. Current Actions

The OSC determined emergency actions were deemed necessary. The Emergency Response Contract Services (ERCS) contractor and the Technical Assistance Team (TAT) were mobilized to respond to this incident.

ERCS was tasked to address the leaking containers within the 26 foot U-Haul truck. Leaking drums were overpacked or transferred into new containers awaiting treatment or disposal. Samples were collected and hazard categorization was performed. Compatibility tests were completed with samples setup and submitted for a disposal profile analysis.

The drums are staged on site awaiting future on site treatment, transportation and disposal. Several drums will be bulked for disposal purposes.

C. State and Local Authorities' Role

1. State and Local Actions to Date

The State of North Carolina is working with the FBI for followup actions and possible Notices of Violations against the generators if identified.

The State has not taken the lead in the removal and disposal of these containers.

2. Potential for Continued State/Local Response

The response capabilities of the State of North Carolina and local government are limited. It is unlikely that the State or any other political subdivision will undertake response activity on this Site in the future due to the lack of available funding.

### III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

#### A. Threats to Public Health or Welfare

The Tryon Street U-Haul Site poses a threat to the public health or welfare as outlined in the National Contingency Plan (NCP).

The removal action criteria outlined in the National Contingency Plan (NCP), 40 CFR Section 300.415(b)(2), will continue to exist until the emergency response action is completed. Potential contaminant exposure to nearby human population, contaminant migration to surface and potential drinking water supplies, release of toxic fumes, weather conditions, and the threat of fire and explosion are major threats to be addressed on this Site.

The Site presents a threat of fire and explosion. Many of the drums were stacked three layers high with incompatible and potentially reactive contents. Preliminary results from hazard categorization reveal the presence of flammable and corrosive liquids. Airborne contaminants from a fire would threaten the local population with toxic fumes.

The runoff from a fire response would contribute to the contamination of the soil and surface waters. Given the proximity to the local population and residential homes, this presents a threat potentially affecting thousands of people within a mile radius.

The majority of containers found cannot be transported in their current condition per Department of Transportation (DOT) regulations. Many will require overpacking or consolidation into approvable containers.

The Site presents a direct contact threat; threat of a long term fire/explosion; threat of toxic airborne particulates; threat of surface soils and threat of surface water and possibly groundwater.

#### B. Threats to the Environment

Runoff from a fire response would affect the local storm drains carrying surface water and possibly groundwater. An air release from a fire could cause environmental damage to the surrounding area.

### IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action

selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

## V. PROPOSED ACTIONS AND ESTIMATED COSTS

Currently, 47 drums ranging in 55 to 85 gallons in size, are staged at the facility. Six waste streams exist within the initial staged containers.

The immediate actions proposed will consist of bulking the identified waste solids and liquids from the drums. All waste will remain in drums and scheduled for transportation and disposal through appropriate disposal methods.

Compatible sludge and solids will be treated and stabilized on-site prior to transportation and disposal to a permitted facility in accordance with the EPA Off-site Rule.

The empty drums will be decontaminated to render them nonhazardous. The metal drums will be crushed and placed inside 20 cubic yard rolloff boxes prior to disposal at a secure landfill.

Site disposal options will continue to include the best available and most cost effective method in accordance with EPA policy. All waste will be considered for on-site treatment prior to off-site disposal.

### A. Proposed Actions

#### 1. Proposed Action Description

- (a) Restrict access.
- (b) Contain and stabilize the Site to prevent further releases.
- (c) Conduct Hazard Categorization of all containers.
- (d) Address and secure the 55 and 85 gallon drums.
- (e) Setup treatment and/or disposal options for all waste streams.

#### 2. Contribution to Remedial Performance

This removal action will abate the immediate threats identified in the preceding sections of this Action Memorandum. Remedial actions are not anticipated once all cleanup efforts are completed by ERRB.

#### 3. Description of Alternative Technologies

Alternative technologies will be considered once the extent of Site contaminants and waste are known.

#### 4. Applicable or Relevant and Appropriate Requirements (ARARs)

There are no Federal ARARs determined to be appropriate for this Site during the emergency response.

#### 5. Project Schedule

Foregoing any unexpected delays, all on site actions are expected to be completed within six weeks.

### B. Estimated Costs

#### Extramural Costs:

##### Regional Allowance Costs:

ERCS	\$60,000
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##### Non-Regional Allowance Costs:

TAT	\$15,000
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Subtotal, Extramural Costs	\$75,000
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Contingency	\$10,000
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TOTAL, EXTRAMURAL COSTS	\$85,000
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#### Intramural Costs:

Direct	\$ 5,000
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Indirect	\$ 5,000
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TOTAL, INTRAMURAL COSTS	\$10,000
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TOTAL, REMOVAL PROJECT CEILING	\$95,000
--------------------------------	----------

### VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

The Site would continue to present a fire and explosion threat. A toxic air release resulting in local exposure to the public is also a threat. There would continue to be a direct contact threat. There would continue to be releases into the environment from surface runoff. Should action be delayed or not taken would pose an imminent threat to the public health and welfare.

### VII. OUTSTANDING POLICY ISSUES

There are no known outstanding policy issues that are related to this Site.

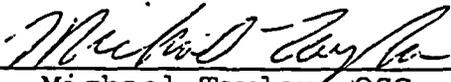
## .VIII. ENFORCEMENT

Enforcement Sensitive

## IX. RECOMMENDATION

This decision document represents the emergency response action for the Tryon Street U-Haul Site, in Charlotte, Mecklenburg County, North Carolina developed in accordance with CERCLA as amended and not inconsistent with the NCP. Conditions at the Site meet the NCP section 300.415 (b)(2) criteria for a removal. The total project ceiling will be \$95,000. Of this, an estimated \$60,000 comes from the Regional removal allowance.

Approve

  
Michael Taylor, OSC

Date

10-20-95

## ENFORCEMENT SENSITIVE

The FBI and NCDEHNR contacted EPA's CID on October 20, 1995. CID notified ERRB for possible emergency response action. There are currently no known Potentially Responsible Parties (PRPs), except for the U-Haul rental company.

The other PRP identified is the person who signed the contract for the rental vehicle. According to the criminal investigators, this person is a former employee of the Cherokee Oil Resources company. Cherokee Oil resulted in two Superfund sites with the owners being criminally indicted and sentenced.

U-Haul did not claim responsibility for these containers and did not chose to secure a contractor. Ongoing investigations will continue with the known PRPs. There is no manifest or other existing documentation to identify the origin of the containers.



42371

(Shaded areas are for use of procurement office only)

US Environmental Protection Agency  
Washington, DC 20460

1. Name of Originator  
Michael Taylor

2. Date of Requisition  
10/23/95



**Procurement Request/Order**

3. Mail Code  
4WD-ERRB

4. Telephone Number  
404/347-3931

5. Date Item Required  
ASAP

6. Signature of Originator  
*Michael Taylor*

7. Recommended Procurement Method  
 Competitive  Other than full and open competition  Sole source small purchase

8. Deliver To (Project Manager)  
Michael Taylor

9. Address  
EPA, 345 Courtland St. NE.  
Atlanta, GA 30365

10. Mail Code  
4WD-ERRB

11. Telephone Number  
404/347-3931

12. Financial Data  
a. Appropriation  
68-20X8145

b. Servicing Finance Office Number  
USEPA Reg. 4 SF022

NOTE: Item 12(d) Document Type — Contract = "C"  
Purchase Order = "P"

FMO Use (c) (13 digits)	D T (d)	Document Control Number (e) (6 digits)	Account Number (f) (10 digits)	Object Class (g) (4 digits)	Amount (h)	
					Dollars	C
		<del>100000</del>	<del>254400000000000000</del>	25.05	\$50,000	00
		D10001	SEE ATTACHED	25.05	\$50,000	00

13. Suggested Source (Name, Address, ZIP Code, Phone/Contact)

14. Amount of money committed is:  
 Original  
 Increase  
 Decrease

15. For Small Purchases Only: Contracting Office is authorized to exceed the amount shown in Block 12(h) by 10% \$100, whichever is less.  
 Yes  No

16. Approvals

a. Branch/Office  
Myron P. Watt, Chief

Date  
10/25/95

d. Property Management Officer/Designee

Date

b. Division/Office

Date

e. Other (Specify) *Patty 4. Bettencourt*  
Patty Bettencourt/Budget

Date  
11/1/95

c. Funds listed in Block 12 and Block 15 (if any) are available and reserved. (Signature of Certifying Official)  
*Carol Baugh Budget*

Date  
11/1/95

f. Other (Specify)

26. Schedule

Item Number (a)	Supplies or Services (b)	Quantity Ordered (c)	Unit (d)	Estimated Unit Price (e)
	Funds needed to respond to emergency at the Tryon Street U-Haul Site, Charlotte, NC.			

10/ Bond acct. # 4876

27. United States of America  
By (Signature)

28. Typed Name and Title of Officer, Buyer, or Clerk



EPA/REGION  
ATLANTA, GA.  
OCT 31 11 46 AM '95  
GRANTS/CONTRACTS.WHD

United States

Environmental Protection Agency  
Washington, DC 20460

Financial and Accounting Data Continuation Sheet:

Continuation of Form Number:

Date of Primary Form:

Social Security Number:

DCN:

42371

10/23/95

D1000

Line	DCN (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 8)	Object Class (Max 4)
1	D10001	96	T	4AD0E	TFA	25 05
2						
3						

SFO

22

(Max

Amount (Dollars) (Cents) Site/Project (Max 6) Cost Org/Code (Max 7)

1	\$50,000	100				
2						
3						

Line	DCN (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 8)	Object Class (Max 4)
4						
5						
6						

Amount (Dollars) (Cents) Site/Project (Max 6) Cost Org/Code (Max 7)

4						
5						
6						

Line	DCN (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 8)	Object Class (Max 4)
7						
8						
9						

Amount (Dollars) (Cents) Site/Project (Max 6) Cost Org/Code (Max 7)

7						
8						
9						

Line	DCN (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 8)	Object Class (Max 4)
10						
11						
12						

Amount (Dollars) (Cents) Site/Project (Max 6) Cost Org/Code (Max 7)

10						
11						
12						

Line	DCN (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 8)	Object Class (Max 4)
13						
14						
15						

Amount (Dollars) (Cents) Site/Project (Max 6) Cost Org/Code (Max 7)

13						
14						
15						

United States of America by (Signature)

Typed Name and Title of Contracting Officer

MEMORANDUM:

DATE: August 20, 1999

TO: FILE: TRYON STREET  
U-HAUL SITE  
NCD 001 290 667  
DLFROM: Jim Barber  
Environmental Engineer  
North Carolina Superfund Section

SUBJECT: Phone conversation with Robin Hedden on 20 August 1999

Today I spoke with Mr. Hedden about the subject site and the incident of the illegal disposal of 47 drums inside of a U-Haul rental truck at the North Tyron Street U-Haul Storage Yard site in Charlotte. Mr. Hedden stated that the drums had spilled some contents inside the rental truck and that the floor of the truck was stained badly. A very small amount of liquid (a gallon or less, estimated) had dripped from the bumper of the truck onto the asphalt pavement at the site. During the removal activities at the site, the EPA subcontractor placed a poly vapor barrier on the asphalt to contain any spillage during over-packing and to aid in clean-up after the removal action was complete. The asphalt pavement did not appear to be damaged or deteriorating, do to the liquid that had dripped from the truck.

I informed Mr. Hedden that the NC Superfund Section was trying to follow up on the activities by the EPA OSC and prepare a response to the EPA as to the likely hood of any future actions at the site. Mr. Hedden could not confirm that the drums had leaked more than what he observed at the time he visited the site, during the removal action, and that weather conditions may have washed any liquid that dripped from the truck prior to his involvement with the site away.



**Part 2 - Initial Site Evaluation**

Use Exhibit 1 of the APA fact sheet to make site assessment decisions based on the answers below:

	YES	NO
Does documentation indicate that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site?		X
Is there an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site?	X	
Is there an apparent release and no documented on-site targets or targets immediately adjacent to the site, but there are nearby targets (e.g., targets within 1 mile)?	X	
Is there no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site?		X
Does the site lack documented on-site, adjacent, or nearby targets?		X
Does the site lack releases or potential to release?	X	
Does the site lack uncontained sources containing CERCLA eligible substances are present on site?		X

Please explain all "yes" answer(s).

1. All drums were sampled prior to consolidation and over-packing for proper disposal.
2. The pavement around and beneath the truck bumper, where some liquid had dripped, was in good condition, with no deterioration or reaction with the liquid.
3. See telephone record dated 20 August 1999, with statements from Mr. Robin Headen and OSC Taylors Action Memorandum (for the first 3 questions above).

**Part 3 - State Site Assessment Recommendation**

Check the box that applies based on the conclusions of the APA:

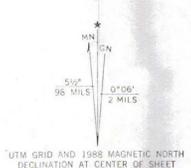
- NFRAP
- Higher Priority SI
- Lower Priority SI
- Defer to RCRA Subtitle C
- Defer to NRC
- Refer to Removal Program - further site assessment needed
- Refer to Removal Program - NFRAP
- Site is being addressed as part of another CERCLIS site
- Other: \_\_\_\_\_

State Reviewer: JIM BARBER *Jim Barber*  
 Print Name/Signature

9/16/99  
 Date



Mapped, edited, and published by the Geological Survey  
Control by USGS, NOS/NOAA, and North Carolina Geodetic Survey  
Topography by photogrammetric methods from aerial  
photographs taken 1965. Field checked 1967  
Supersedes planimetric map dated 1948  
Polyconic projection  
10,000-foot grid based on North Carolina coordinate system  
3000-meter Universal Transverse Mercator grid ticks, zone 17,  
shown in blue. 1927 North American Datum  
To place on the predicted North American Datum 1983 move the  
projection lines 10 meters south and 17 meters west as  
shown by dashed corner ticks  
Red tint indicates areas in which only landmark buildings are shown



ROAD CLASSIFICATION

Primary highway, all weather, hard surface	Light-duty road, all weather, improved surface
Secondary highway, all weather, hard surface	Unimproved road, fair or dry weather

U.S. Route      State Route



THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U. S. GEOLOGICAL SURVEY  
DENVER, COLORADO 80225 (R RESTON, VIRGINIA 22092  
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Revisions shown in purple and woodland compiled in cooperation  
with State of North Carolina agencies from aerial photographs  
taken 1984 and other sources. This information not field checked  
Map edited 1988  
Purple tint indicates extension of urban areas

CHARLOTTE EAST, N. C.  
35080-87-1F-024  
1967  
PHOTOREVISED 1988  
DMA 4854 III NE - SERIES V842





Tryon Street U-Haul Site  
1224 North Tryon Street  
Charlotte, Mecklenburg County, North Carolina

FINAL POLREP

DATE: 16 JANUARY 1996

FROM: Michael Taylor, OSC

TO: Myron D. Lair, Chief ERRB, EPA Region IV  
Art Johnson, ERD/HQ Regional Coordinator  
Michael Henderson, Region IV Community Relations  
Debbie Dietrich, Headquarters

This POLREP covers the final phase of removal actions during December 1995 to January 1996.

I. BACKGROUND:

RESPONSE AUTHORITY: CERCLA  
NPL STATUS: NON-NPL

PERSONNEL ON-SITE (December 4-8, 1995)

EPA: 1  
ERCS: 5  
NCDEHNR: 1

LEAD AGENCY: EPA Region IV, ERRB  
345 Courtland St.  
Atlanta, GA 30365  
(404) 347-3931 x6143

II. SITUATION:

EPA's Emergency Response and Removal Branch (ERRB) was notified of a leaking U-Haul truck loaded with abandoned drums in the downtown area of Charlotte, North Carolina. Approximately forty 55 gallon drums were triple stacked within a 26 foot rental truck and abandoned in early October. The towing service used by the U-Haul company towed the vehicle back to the rental center and parked the vehicle. North Carolina's Department of Environment Health and Natural Resources (DEHNR) and the Federal Bureau of Investigation (FBI) were notified by U-Haul the week of 16 October 1995.

EPA's Criminal Investigation Division (CID) was notified by the FBI of the incident. CID notified ERRB on 20 October for possible response actions due to the threats this incident posed to the public and the environment.

**ACTIONS TAKEN**

Upon mobilization of the TAT and ERCS during the initial response all containers were stabilized and sampled. Hazard categorization was performed to identify waste characteristically. Disposal profiles were arranged for all identified waste streams during late October. The site was secured while awaiting analytical data and disposal approvals.

CID and NCDEHNR required a separate set of samples to pursue criminal actions pending. Arrangements were made for NCDEHNR with EPA's Environmental Service Division (ESD) to oversee the collection of representative samples from the staged drums. This event was accomplished during the week of 13 November.

ERRB began the final phase of the removal by bulking and consolidating all compatible drums during the week of 04 December.

There were a total of 47 drums resulting in nine separate waste streams that included waste codes of: D001, D005, D007, D008, F003, F005 and Nonhazardous solids. Waste was disposed of through Heritage Environmental Services.

Removal activities for all containers were completed by 08 December 1995. A followup site visit was conducted 21 December 1995 to complete and finalize all planned site activities.

**FUTURE ACTIONS:**

No further site removal actions are anticipated by ERRB. CID and NCDEHNR are currently awaiting all analytical data from the samples collected during November 1995.

**COST INFORMATION:**

	<u>COST TO DATE</u>	<u>CEILING</u>
EPA and TAT	< \$ 5,000	\$20,000
ERCS	\$36,000	\$50,000
<b>TOTAL</b>	<b>\$41,000</b>	<b>\$70,000</b>