

# Letter Health Consultation

---

Evaluate the Potential for Exposure to Toxic Chemicals

CLAYTON COUNTY HEALTH DEPARTMENT BUILDING

JONESBORO, CLAYTON COUNTY, GEORGIA

FEBRUARY 13, 2008

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
Public Health Service  
Agency for Toxic Substances and Disease Registry  
Division of Health Assessment and Consultation  
Atlanta, Georgia 30333

## **Health Consultation: A Note of Explanation**

An ATSDR health consultation is a verbal or written response from ATSDR to a specific request for information about health risks related to a specific site, a chemical release, or the presence of hazardous material. In order to prevent or mitigate exposures, a consultation may lead to specific actions, such as restricting use of or replacing water supplies; intensifying environmental sampling; restricting site access; or removing the contaminated material.

In addition, consultations may recommend additional public health actions, such as conducting health surveillance activities to evaluate exposure or trends in adverse health outcomes; conducting biological indicators of exposure studies to assess exposure; and providing health education for health care providers and community members. This concludes the health consultation process for this site, unless additional information is obtained by ATSDR which, in the Agency's opinion, indicates a need to revise or append the conclusions previously issued.

You May Contact ATSDR TOLL FREE at  
1-800-CDC-INFO

or

Visit our Home Page at: <http://www.atsdr.cdc.gov>

LETTER HEALTH CONSULTATION

Evaluate the Potential for Exposure to Toxic Chemicals

CLAYTON COUNTY HEALTH DEPARTMENT BUILDING

JONESBORO, CLAYTON COUNTY, GEORGIA

Prepared By:

Georgia Department of Human Resources  
Division of Public Health  
Under Cooperative Agreement with the  
U.S. Department of Health and Human Services  
Agency for Toxic Substances and Disease Registry



Georgia Department of Human Resources • Division of Public Health • Stuart T. Brown, M.D., Director  
2 Peachtree Street NW • Suite 15.470 • Atlanta, Georgia 30303-3142  
404-657-2700 • FAX: 404-657-2715

December 10, 2007:

Stephen Morgan, MD (ret.)  
District Health Director  
Clayton County Health Department  
1117 Battle Creek Road  
Jonesboro, GA 30236

Dear Dr. Morgan,

This letter is in response to your request on May 18, 2007 to evaluate the potential for exposure to toxic chemicals from past industrial operations at the Clayton County Health Department office building in Jonesboro, Georgia. In 2003, the Clayton County Commission purchased property located at 1117 Battle Creek Road for use as the District 3-3 Health Department. As we discussed, the Georgia Division of Public Health (GDPH) agreed to address the following:

- Are there completed and/or potential exposure pathway(s) to toxic substances used during past industrial operations?
- If so, what are the public health implications for staff and clients?

The following documents were reviewed to assist with this request. Complete References are available at the end of this report:

- 1) Anderson Environmental, Inc., *Limited Asbestos Inspection of 1117 Battle Creek Rd., Former Asten Johnson Building*, Jonesboro, GA; 5/21/03.
- 2) Moreland Altobeli Associates, Inc., *Phase 1 Environmental Site Assessment*; 10/02.
- 3) Professional Services, Inc., *Limited Asbestos Sampling: District 3-3 Health Department*; 1/12/07.
- 4) Professional Services, Inc., *Short-Term Radon Gas Screening Survey: District 3-3 Health Department*; 1/12/07.

### **Discussion**

A title search showed that the property was first deeded to Atlanta Wire Works, Inc. in 1969. Under several corporations, the facility manufactured synthetic forming fabric for paper mills until 2003, when it was sold to Clayton County. In general, these processes do not use or generate toxic chemicals. However, the machinery used likely required cleaning with large quantities of regulated toxic solvents.

Because this facility was once an industrial facility, we looked into whether it had ever held any permits. This would tell us if there were quantities of regulated chemicals generated and the allowable amounts released to the environment through air emission and water discharge permits. Under the federal Resource Conservation and Recovery Act of 1976 (RCRA), hazardous wastes are regulated by federal and state authorities from "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. Under the laws of RCRA, industries are required to maintain a comprehensive and accurate historical record of facility operations regarding hazardous materials use. In

addition, the facility was searched under federal and state “Superfund” databases. No history of known or suspected releases to the environment above allowable regulatory levels (including spills) was documented.

According to the Georgia Environmental Protection Division (GEPD) and the U.S. Environmental Protection Agency, 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. The GEPD Air Protection Branch has never issued an Air Emissions Permit to any company that occupied the site. GEPD’s Underground Storage Tank (UST) Program stated that the location has never had a UST. And, the GEPD Watershed Protection Branch has never issued a wastewater discharge permit at this location. Based on building structure, function, and location, there is no evidence to suggest that any hazardous waste was generated during operations.

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 as 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: (1) the failure to notify the NRC of a field storage location change (in Indiana), and (2) the failure to obtain NRC consent in writing prior to the transfer of the license from JWI Group, Inc. to Asten Johnson, Inc. 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 issues were resolved and the federal license was terminated in August 2000.

In response to our investigation, the Georgia Radioactive Materials Program stated 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, an inspection 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 and the GEPD, Lead Paint and Asbestos Program 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, ceiling tiles, dust and debris from renovation activities, and several other building materials and locations. subsequent roof replacement activities conducted in early 2007 resulted

in roof debris entering some workspaces. In addition, based on site geology information summarized in the Phase 1 Assessment, the underlying substrata would indicate a higher risk for radon gas.

In response, during September 2006, a records search by GEPD revealed that the building was renovated and inspected under federal laws and guidelines for proper lead and asbestos removal. However, to further ensure the safety of staff and clients, pipes and other materials of concern, roof renovation debris, and indoor air were sampled and analyzed for asbestos by a licensed contractor hired by the Clayton County Board of Health in December 2006. No asbestos was found in any sample. At that time, indoor air was also sampled for radon gas using approved methods, and results do not indicate elevated levels of radon anywhere in the building. Based on the apparent thoroughness of asbestos removal, and lead and asbestos removal and inspection records, no other sampling was recommended.

### **Conclusions**

- Based on available data, there is no evidence that staff and clients are at risk for exposure to toxic chemicals from past industrial operations at this facility, therefore the building represents no public health hazard.
- Results of this environmental regulatory and health investigation do not warrant further exposure or risk assessments regarding past operations.

### **Recommendations**

There are no recommendations at this time.

Supporting documentation is available in the site file housed at the Georgia Department of Human Resources, Chemical Hazards Program, 2 Peachtree Street, 13th floor, Atlanta, GA 30303.

If additional data becomes available in the future, GDPH will consider a request for an evaluation. If there are any questions regarding this health consultation, please contact me at (404) 657-6534.

Sincerely,

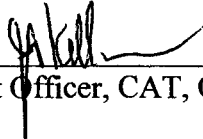
Jane M. Perry, MPH  
Director  
Chemical Hazards Program

## REFERENCES

1. Anderson Environmental, Inc., *Limited Asbestos Inspection of 1117 Battle Creek Rd., Former Aaten Johnson Building*, Jonesboro, GA; 5/21/03.
2. Environmental Data Resources, Inc., *Industrial Site Package: Inquiry Number 857551.1s*; 10/4/02.
3. Georgia Environmental Protection Division, Radiation Materials Branch, *Correspondence (email)*; 5/31/07.
4. Georgia Environmental Protection Division, Lead Paint and Asbestos Program, *Limited Asbestos Inspection*; 10/31/07.
5. JWI Group, Fact Sheet: *200<sup>th</sup> Anniversary Celebration*; acq. 11/06.
6. Moreland Altobeli Associates, Inc., *Phase 1 Environmental Site Assessment*; 10/02.
7. Moreland Altobeli Associates, Inc., *Purchase and Sale Agreement*; 10/02.
8. Professional Services, Inc., *Limited Asbestos Sampling: District 3-3 Health Department*; 1/12/07.
9. Professional Services, Inc., *Short-Term Radon Gas Screening Survey: District 3-3 Health Department*; 1/12/07.
10. U.S. Nuclear Regulatory Commission, IR 10-24920-01, JWI Group, d.b.a. Atlanta Wire; website accessed 7/11/06.
11. U.S. Nuclear Regulatory Commission, ML003715350, JWI Group, d.b.a. Atlanta Wire; website accessed 5/24/06.

## CERTIFICATION

This letter health consultation was prepared by the Georgia Division of Public Health under a cooperative agreement with the federal Agency for Toxic Substances and Disease Registry (ATSDR). It was completed in accordance with approved methodologies and procedures existing at the time the health consultation was initiated. Editorial Review was completed by the Georgia Division of Public Health.



Technical Project Officer, CAT, CAPEB, DHAC

The Division of Health Assessment and Consultation (DHAC), ATSDR, has reviewed this health consultation and concurs with its findings.



Team Lead, CAT, CAPEB, DHAC, ATSDR



## Appendix A: Photographs



Debris from roof improvements falls on workspaces.



Health department and state regulatory agency staff tour the building looking for health and safety hazards.



Pressurized gas lines exposed near the front entrance of the health department.