



November 15, 2023

CDM Smith
1441 Main Street, Suite 1000
Columbia, South Carolina 29201

Attention: Mr. Thomas Evans, P.E.

Reference: **Asbestos and Lead-Based Paint Commentary**
I-526 at Long Point Road
Mount Pleasant, South Carolina
S&ME Proposal No. 200424A

Dear Mr. Evans:

S&ME, Inc. (S&ME) is pleased to submit this letter addressing potential asbestos containing materials (ACMs) and lead-based paint coated building components and materials, and lead containing materials for seven privately owned buildings that may be impacted by right of way (ROW) acquisition. This commentary is provided in general accordance with the Agreement between Engineer and Subcontractor for Professional Services with CDM Smith and S&ME, Inc. dated March 29, 2023.

◆ Background

S&ME was contacted to discuss potential hazardous building materials, limited to ACMs and lead paint and materials, associated with privately owned buildings impacted by ROW acquisition for the I-526 and Long Point Road interchange project located in Mount Pleasant, South Carolina. We understand seven buildings will be demolished by ROW acquisition to support the planned project, consisting of the following locations/buildings:

- J&K Home Furnishings; 600 Loing Point Road, Mount Pleasant, SC; (1 building)
- Long Point Center; 503 Wando Park Boulevard, Mount Pleasant, SC; (1 building)
- 367 Wando Place Drive, Mount Pleasant, SC; (1 building)
- 488 Turnstone Street, Mount Pleasant, SC; (1 building)
- 443 Long Point Road, Mount Pleasant, SC; (1 building)
- 449 Long Point Road, Mount Pleasant, SC; (2 buildings)

◆ Procedures

Public records and Google Earth were used to determine the approximate size and date of construction of the buildings. As requested, none of the buildings included in this commentary were entered, however general observations were conducted from the public ROW. No bulk samples were collected and analyzed as part of this service. Also, no components or materials were tested for the presence of lead.



◆ Commentary

The Environmental Protection Agency (EPA) requires asbestos survey assessments, conducted by EPA accredited individuals, prior to renovation and/or demolition projects, regardless of the age of the materials or date of construction. The applicable EPA regulations, enforced by District IV and the South Carolina Department of Health and Environmental Control (SCDHEC), include Code 40, part 61, subpart M, Final Rule National Emissions Standards for Hazardous Air Pollutants (NESHAP), and Asbestos in Schools Hazard Abatement Reauthorization Act (ASHARA) which applies to public buildings. The SCDHEC also requires onsite asbestos air monitoring prior to, during, and following completion of asbestos abatement activities involving 160 square feet or greater of friable ACMs, and a written project design, prepared by a SCDHEC licensed Project Designer, when an asbestos project involves 3,000 square feet or greater of regulated ACMs (RACM) or non-friable ACM rendered friable.

The SCDHEC requires disposal of components coated with lead-based paint (≥ 0.7 milligrams of lead per square centimeter) as regulated waste. The EPA also restricts waste that is defined as hazardous due to leaching characteristics of the lead-based paint. Hazardous waste regulations include Title 40 Code of Federal Regulations parts 260 through 272. Lead-based paint is regulated to prevent occupational exposures in accordance with the Occupational Safety and Health Administration (OSHA) regulation found in 29 CFR 1926.62 (Lead in Construction).

J&K Home Furnishings

600 Loing Point Road, Mount Pleasant, SC; (1 building)

This building is an active home furnishings retail store. Based on available public records, the building was constructed in 2002. The building is one-story, with a footprint of 37,534 square feet, and appears to be situated on a concrete slab, on-grade. Exterior finishes consist of brick veneer walls and main roof appears to be flat and built-up, with limited pitched metal roof accents.

Based on the approximate date of construction, no ACMs or lead paint/materials would be anticipated, following analytical testing for asbestos and lead, with exception to potential lead-based paint coating on structural steel.

Typical suspect ACMs encountered in a building as described above consist of the following:

- Gypsum board and associated joint compound;
- Acoustical ceiling tiles;
- Spray-applied ceiling texture (popcorn ceiling);
- Mastics associated with rubber cove bases;
- Grout and grout-bed associated with ceramic tile;
- Vinyl floor coverings and associated mastics;
- Fire-stop caulking;
- Plaster base and associated finish, walls/ceilings;
- Mastics applied to underside of stainless steel sink basins;
- Spray-applied fireproofing;
- Glue/mastic associated with carpeting;
- Asphaltic roofing materials; and



- Caulking associated with brick veneer expansion joints.

Typical suspect lead paint/materials encountered in a building, as described above, consist of the following:

- Paint coatings on structural components and architectural finishes;
- Ceramic tile glazing;
- Porcelain sinks, toilets and urinals.

Long Point Center

503 Wando Park Boulevard, Mount Pleasant, SC; (1 building)

The building is actively used as office space for multiple businesses. Based on available public records, the building was constructed in 1997. The building is two-stories, with a footprint of 15,092 square feet, and appears to be situated on a concrete slab, on-grade. Exterior finishes consist of brick veneer walls and pitched asphalt shingle roof.

Based on the approximate date of construction, no ACMs or lead paint/materials would be anticipated, following analytical testing for asbestos and lead, with exception to potential lead-based paint coating on structural steel.

Typical suspect ACMs encountered in a building as described above consist of the following:

- Gypsum board and associated joint compound;
- Acoustical ceiling tiles;
- Spray-applied ceiling texture (popcorn ceiling);
- Mastics associated with rubber cove bases;
- Grout and grout-bed associated with ceramic tile;
- Vinyl floor coverings and associated mastics;
- Fire-stop caulking;
- Plaster base and associated finish, walls/ceilings;
- Mastics applied to underside of stainless steel sink basins;
- Spray-applied fireproofing;
- Glue/mastic associated with carpeting;
- Asphaltic shingle and felt roofing materials; and
- Caulking associated with brick veneer expansion joints.

Typical suspect lead paint/materials encountered in a building, as described above, consist of the following:

- Paint coatings on structural components and architectural finishes;
- Ceramic tile glazing;
- Porcelain sinks, toilets and urinals.



367 Wando Place Drive, Mount Pleasant, SC; (1 building)

Based on available public records, the building was constructed in 2000. The building is one-story, with a footprint of 7,080 square feet, and appears to be situated on a concrete slab, on-grade. Exterior finishes consist of cementitious (Hardi plank) siding and pitched asphalt shingle roof.

Based on the approximate date of construction, no ACMs or lead paint/materials would be anticipated, following analytical testing for asbestos and lead.

Typical suspect ACMs encountered in a building as described above consist of the following:

- Cementitious siding;
- Gypsum board and associated joint compound;
- Acoustical ceiling tiles;
- Spray-applied ceiling texture (popcorn ceiling);
- Mastics associated with rubber cove bases;
- Grout and grout-bed associated with ceramic tile;
- Vinyl floor coverings and associated mastics;
- Fire-stop caulking;
- Plaster base and associated finish, walls/ceilings;
- Mastics applied to underside of stainless steel sink basins;
- Glue/mastic associated with carpeting; and
- Asphaltic shingle and felt roofing materials.

Typical suspect lead paint/materials encountered in a building, as described above, consist of the following:

- Paint coatings on architectural finishes;
- Ceramic tile glazing;
- Porcelain sinks, toilets and urinals.

488 Turnstone Street, Mount Pleasant, SC; (1 single-family residential structure)

The building appears to be an occupied single-family residential structure. Based on available public records, the structure was constructed in 2017. The structure is two-stories, with a footprint of 2,736 square feet, and appears to be situated on a raised concrete slab. Exterior finishes consist of cementitious (Hardi plank) siding and pitched asphalt shingle roof.

Based on the approximate date of construction, no ACMs or lead paint/materials would be anticipated, following analytical testing for asbestos and lead.

Typical suspect ACMs encountered in a building as described above consist of the following:

- Cementitious siding;
- Gypsum board and associated joint compound;
- Acoustical ceiling tiles;



- Spray-applied ceiling texture (popcorn ceiling);
- Mastics associated with rubber cove bases;
- Grout and grout-bed associated with ceramic tile;
- Vinyl floor coverings and associated mastics;
- Glue/mastic associated with carpeting; and
- Asphaltic shingle and felt roofing materials.

Typical suspect lead paint/materials encountered in a building, as described above, consist of the following:

- Paint coatings on architectural finishes;
- Ceramic tile glazing;
- Porcelain sinks, toilets and bathtubs.

443 Long Point Road, Mount Pleasant, SC; (1 building)

The building appears to be a commercial building for multiple businesses. Based on available public records, the building was constructed in 1987. The building is one-story, with a footprint of 16,700 square feet, and appears to be situated on a concrete slab, on-grade. Exterior finishes consist of metal paneled walls and sloped built-up roof.

Based on the approximate date of construction, no ACMs or lead paint/materials would be anticipated, following analytical testing for asbestos and lead, with exception to potential lead-based paint coating on structural steel.

Typical suspect ACMs encountered in a building as described above consist of the following:

- Gypsum board and associated joint compound;
- Acoustical ceiling tiles;
- Spray-applied ceiling texture (popcorn ceiling);
- Mastics associated with rubber cove bases;
- Grout and grout-bed associated with ceramic tile;
- Vinyl floor coverings and associated mastics;
- Fire-stop caulking;
- Plaster base and associated finish, walls/ceilings;
- Mastics applied to underside of stainless steel sink basins;
- Spray-applied fireproofing;
- Glue/mastic associated with carpeting;
- Asphaltic shingle and felt roofing materials; and
- Caulking associated with metal paneling walls.

Typical suspect lead paint/materials encountered in a building, as described above, consist of the following:

- Paint coatings on structural components and architectural finishes;
- Ceramic tile glazing;
- Porcelain sinks, toilets and urinals.



449 Long Point Road, Mount Pleasant, SC; (2 buildings)

The two buildings appear to be used as a commercial office and warehouse. Based on available public records, the buildings were constructed in 1998. The buildings are one-story, with a footprint of 2,300 and 15,008 square feet each, and appear to be situated on concrete slabs, on-grade. Exterior finishes consist of metal paneled walls and sloped roofs.

Based on the approximate date of construction, no ACMs or lead paint/materials would be anticipated, following analytical testing for asbestos and lead, with exception to potential lead-based paint coating on structural steel.

Typical suspect ACMs encountered in a building as described above consist of the following:

- Gypsum board and associated joint compound;
- Acoustical ceiling tiles;
- Spray-applied ceiling texture (popcorn ceiling);
- Mastics associated with rubber cove bases;
- Vinyl floor coverings and associated mastics;
- Fire-stop caulking;
- Mastics applied to underside of stainless steel sink basins;
- Glue/mastic associated with carpeting;
- Caulking associated with metal paneling walls/roofing.

Typical suspect lead paint/materials encountered in a building, as described above, consist of the following:

- Paint coatings on structural components and architectural finishes; and
- Porcelain sinks, toilets and urinals.

◆ Limitations

This letter is limited to the seven buildings located at the referenced addresses and did not include testing, sampling or analysis of suspect ACMs or lead-based paint and lead materials. None of the referenced buildings were entered as part of this service.

This report is provided for the sole use of the client. Use of this report by any other parties will be at such party's sole risk and S&ME disclaims liability for any such use or reliance by third parties. The results presented in this report are indicative of conditions only during the time of the sampling and of the specific materials referenced.

◆ Recommendations

Prior to the planned demolition activities impacting the seven subject buildings, each building must be inspected, by a SCDHEC licensed inspector, for the presence of ACMs as required by the SCDHEC Regulations 61-86.1. Identified ACMs must also be removed from the structures prior to demolition activities, and properly disposed. Asbestos abatement activities must be conducted by a SCDHEC licensed contractor and waste must be disposed



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in a SCDHEC approved landfill. A notification of demolition, along with the written asbestos assessment report for each structure, must be submitted to the SCDHEC Asbestos Section, 10 weekdays prior to demolition activities.

Lead-based paint and lead containing materials, as defined by the SCDHEC, require proper handling and disposal in a Class II or Class III landfill. Accumulations of paint waste (sludge, chips, dust, or flakes) and lead contaminated products must be tested by the Toxicity Characteristic Leachate Procedure (TCLP) to determine if the waste is classified as hazardous, which requires disposal in a Subtitle C (hazardous waste) landfill. Lead waste, at a minimum, must be disposed in a Class II or III landfill approved by SCDHEC.

◆ Closing

S&ME appreciates the opportunity to provide you with our industrial hygiene services and we look forward to our continued association. If you have any questions concerning the report, please contact us at (843) 884-0005.

Sincerely,

S&ME, Inc.

A handwritten signature in blue ink, reading "Josh B. Veloso".

Josh Veloso
Staff Industrial Hygienist

A handwritten signature in blue ink, reading "Terry W. Richburg".

Terry W. Richburg
Operations Manager – Environmental