

Appendix L

Pollution Reports

Dynamac Corporation

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U.S. ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 Southwest Vermiculite - Removal Polrep
 Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region VI

Subject: POLREP #1
 Initial POLREP - Early Response - Southwest Vermiculite Site - Haines Avenue
 Residences
 Southwest Vermiculite

Albuquerque, NM
 Latitude: 35.1025100 Longitude: -106.6444900

To: Stephen Connolly, NMED
 Lawrence Stanton, EPA HQ
 Ragan Broyles, Superfund Division

From: Mike McAteer, OSC

Date: 1/18/2012

Reporting Period: January 11, 2012 to January 18, 2012

1. Introduction

1.1 Background

Site Number:	NMN000607041	Contract Number:	
D.O. Number:		Action Memo Date:	1/4/2012
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/11/2012	Start Date:	1/12/2012
Demob Date:		Completion Date:	
CERCLIS ID:	NMN000607041	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency Response Removal Action

1.1.2 Site Description

The residential properties where this response action is taking place consist of two residential properties and one vacant lot (home was demolished in 2006) located north of the former SWV processing facility and are situated on Haines Avenue (addresses are 7, 11, and 15 Haines Ave). Of the two residential structures, one family currently occupies one home and the other home is vacant and is up for sale. The vacant lot previously contained a home but, it was demolished in 2006, and the lot is currently being used as a parking area for workers and customers at the recycling facility across the street.

Field assessment sampling activities occurred in two phases. Phase I was initiated on January 26, 2011 and was completed on January 27, 2011. During Phase I, soil samples were collected from two of the subject properties. Because access to the third property was not granted at that time, EPA returned to conduct Phase II field assessment activities on June 15, 2011 which included collecting soil samples

from the third residential property. The field assessment sampling activities were conducted to determine the presence of Libby Asbestos (LA) or tremolite fibers associated with the Libby, Montana, WR Grace mining operations.

Soil samples were collected from 7 grids across the three properties. Analysis of the samples collected from the interval at 0 to 1 inch bgs indicated that two grids had no asbestos detected. Three grids had amphibole asbestos fibers detected in trace amounts ($> 0\%$ but $< 0.20\%$). One grid had amphibole asbestos fibers detected at greater than $.20\%$ but less than 1.0% and one grid had amphibole asbestos fibers detected at 2.0% . Soil samples collected from the same 7 grids at the interval from 1 to 6 inches bgs indicated that four had no asbestos detected and three had trace amounts ($>0\%$ but $< 0.20\%$).

Subsurface soil samples were collected from soil cores collected from two of the subject lots at the following depths: 6 to 12 inches bgs; 12 to 24 inches bgs; 24 to 36 inches bgs; 36 to 48 inches bgs; 48 to 60 inches bgs; and 60 to 72 inches bgs. Analysis of these deep samples indicated amphibole asbestos fibers in trace concentrations ($> 0\%$ but $< 0.20\%$) in the 12 to 24 inches bgs sample in one grid, and in the 36 to 48 inches and 60 to 72 inches bgs samples in another grid.

1.1.2.1 Location

The three residential properties are located at 7, 11, and 15 Haines Ave (northeast corner of Haines and 1st Street) in Albuquerque, NM.

1.1.2.2 Description of Threat

Asbestos has been detected in residential soils surrounding two homes and a vacant residential lot. One of the homes is currently occupied and the other is vacant and up for sale. Current and future residents at these three properties can easily disturb this contaminated soil by way of routine residential activities such as walking, playing or through routine yard maintenance. Airborne exposure to asbestos may occur through the release of asbestos fibers in contaminated soil through routine residential activities. Effects of asbestos on the lungs is a major health concern as chronic (long-term) exposure to asbestos in humans via inhalation can result in a lung disease termed asbestosis. A large number of occupational studies have reported that exposure to asbestos via inhalation can cause lung cancer and mesothelioma (a rare cancer of the membranes lining the abdominal cavity and surrounding internal organs). The routine daily use and disturbance of the soil on these three properties greatly increases the potential for exposure to human populations.

Soil sampling data from assessment activities at the three residential properties shows Libby asbestos contamination on varying grids on the Site ranging in levels between 0 and 2%. Due to the elevated levels of asbestos already detected in soils, EPA has decided not to conduct Activity Based Sampling (ABS) on these properties and will instead conduct this emergency response action. This will include grids where trace amounts of asbestos were detected. Based on ABS scenarios conducted at the Solico Site, approximately 2 miles north of the SWV site, EPA has found that even trace level grids can produce elevated levels of asbestos fibers in the air. This fact is most likely a result of the dry soil conditions and lack of vegetative cover which are common in this desert climate. Also, because of the small size of these properties and the known cost to conduct ABS versus the cost to remediate, EPA believes it is more cost effective and more protective to simply remove the contaminated grids instead of expending more time and funds to conduct ABS.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Analytical results of soil samples indicate the presence of asbestos in surface soils at concentrations as high as 2% and in subsurface soils as high as $.25\%$.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA Region 6, along with our ERRS and START contractors mobilized to the site in Albuquerque on January 11, 2012 and preparatory and removal work began onsite on January 12, 2012.

2.1.2 Response Actions to Date

In addition to routine setup activities such as equipment mobilization, command post setup, work zone delineation, relocating/securing resident personal effects, excavation of soil has been initiated. Soil excavation and staging has also been conducted in conjunction with the utility locating, and a gravel pad

has been installed to accommodate parking of transport trucks during loading of excavated soil.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

EPA currently anticipates that the total duration of the removal activities will require approximately 3 weeks to conduct.

2.2.1.1 Planned Response Activities

This response action will include the following:

- a. As necessary, continue to assess and characterize threats posed by the Site including sampling of soils for asbestos contamination in both onsite and offsite areas.
- b. Excavate and remove asbestos-contaminated soils. The excavation depth will be two feet below grade.
- c. Fill all excavated areas with clean fill material using an approved compaction method.
- d. Dispose of contaminated soils excavated pursuant to subparagraph b. above at an EPA-approved offsite disposal facility in accordance with Section 121(d)(3) of CERCLA and 40 CFR 300.440, and transport all waste materials in accordance with Department of Transportation rules and regulations.
- e. Suppress dust and control erosion during the removal action.
- f. Monitor and sample as necessary personal and ambient air during removal activities.
- g. Restore the surface features to pre-existing conditions as appropriate.
- h. Prevent future disturbances, such as excavation of areas of the Site where contamination remains at depths greater than two feet below grade and/or under physical containment systems. Coordinate with the current owner of the Site property and with the appropriate State and local authorities for institutional controls to implement such restrictions.

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

EPA OSC Mike McAteer is responsible for overall site safety.

Clint Henderson of Bandera Resources is the Site Safety Officer for the ERRS team. The START Project Manager, John Koehnen, is the Site Safety Officer for the START team.

2.5.2 Liaison Officer

2.5.3 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

New Mexico Environmental Department (NMED)
New Mexico OSHA
Bernalillo County Health Department
City of Albuquerque, NM

4. Personnel On Site

START Contractor:	Dynamac Corporation
ERRS Contractor:	Environmental Quality Management, Inc. (EQM)
ERRS Subcontractors:	Bandera Resources United States Environmental Services (USES)

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

No information available at this time.

6.2 Reporting Schedule

No information available at this time.

7. Situational Reference Materials

No information available at this time.

U.S. ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 Southwest Vermiculite - Removal Polrep
 Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region VI

Subject: **POLREP #2**
Final PolRep, Southwest Vermiculite - Haines Avenue Residential Properties
Southwest Vermiculite

Albuquerque, NM
Latitude: 35.1025100 Longitude: -106.6444900

To: Stephen Connolly, NMED
 Lawrence Stanton, EPA HQ
 Ragan Broyles, Superfund Division

From: Mike McAteer, OSC

Date: 3/1/2012

Reporting Period: January 12, 2012 - February 10, 2012

1. Introduction

1.1 Background

Site Number:	NMN000607041	Contract Number:	
D.O. Number:		Action Memo Date:	1/4/2012
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/11/2012	Start Date:	1/12/2012
Demob Date:	2/11/2012	Completion Date:	2/10/2012
CERCLIS ID:	NMN000607041	RCRIS ID:	
ERNS No.:		State Notification:	
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determine the presence of Libby Asbestos (LA) or tremolite fibers associated with the Libby, Montana, WR Grace mining operations.

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2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA Region 6, along with our ERRS and START contractors mobilized to the site in Albuquerque on January 11, 2012 and preparatory and removal work began onsite on January 12, 2012. Work at the site continued through completion of the site restoration activities on February 10, 2012.

2.1.2 Response Actions to Date

In addition to the initial setup activities such as equipment mobilization, command post setup, work zone delineation, relocating/securing resident personal effects, excavation of affected soil was conducted throughout the site down to two (2) feet below ground surface for all affected areas, except for a small

area (approximately 20 x 15 feet) of the area in the backyard, adjacent to north of the Residence at 7 Haines. This area was excavated to one (1) foot bgs as it was covered by a concrete slab as a part of the site restoration.

The remainder of the site underwent soil excavation and staging throughout the process, with approximately 1,180 cubic yards of affected soil removed for off-site disposal at the approved Disposal Facility (DF); the Keer's Asbestos Landfill at Mountainair, NM. The affected soil was manifested and transported to the landfill either in Roll-off containers or End Dump Tractor Trailers which were double wrapped with a plastic liner and folded over and affixed (i.e., "burrito wrapped") prior to transportation off site. During all excavation, staging and/or loading activities dust suppression activities were conducted using multiple water hoses fed by a 4,000 gallon water truck to assure that airborne dust or asbestos particles did not leave the site. Upon completion of the soil excavation activities at each grid defined at the site, soil confirmation samples were collected prior to placing barricade fencing (for future excavation delineation if needed) and clean soil backfill into the excavated areas. Since the excavations already occurred to two feet bgs, no additional excavation occurred regardless of the analytical results, but the samples were collected to assess the cleanup activities.

Once the excavation and backfilling activities were conducted at all of the affected areas, site restoration activities were conducted to restore the site area to the initial conditions, or as directed by the property owners. Site restoration activities included placement of a concrete slab (versus grass) in the backyard of 7 Haines, and placement of decorative rock in all other open (i.e., not covered with concrete or a residence) areas at all three Haines Avenue properties. A stockade fence was re-installed between the 7 and 11 Haines residences, and a chain-link fence was re-installed between the residence at 11 Haines and the open/empty lot at 15 Haines. In addition to the site restoration activities noted above, various repairs or other activities were conducted, including: repairing a water line at the southwest corner of the 11 Haines residence, running a new PVC feeder water line from the northwest corner of the 7 Haines residence to the Rose Garden area along the northern property boundary, excavation of shallow soil/grass at the right-of-way/easement area along the southern portion of 15 Haines and backfilling with the decorative rock placed throughout the site, as well as general housekeeping and cleanup at the site before demobilization.

A site walk was conducted with the OSC, the property owners, ERRS and START-3 representatives the day before the site activities were completed to determine whether any other site-related work was required. The property owners did not identify any needs other than those already conducted/planned.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Soil	Soil	1,180 cu yds	Multiple		At approved DF

2.2 Planning Section

2.2.1 Anticipated Activities

As of February 10, 2012, all planned activities at the Haines Avenue Properties have been completed and no additional Removal or Assessment activities are expected.

2.2.1.1 Planned Response Activities

All Response Activities have been conducted and at present, no additional Removal or Assessment activities are expected.

2.2.1.2 Next Steps

The START-3 Contractor will compile all of the analytical and monitoring data collected during the Removal Action and prepare a Removal Report which summarizes all of the Removal activities, samples collected and related analytical results, and any issues noted during the Removal activities.

2.2.2 Issues

No issues are noted at this time.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

EPA OSC Mike McAteer was responsible for overall site safety during the Removal Action.

Clint Henderson of Bandera Resources was the Site Safety Officer for the ERRS team. The START Project Manager, John Koehnen, was the Site Safety Officer for the START team.

2.5.2 Liaison Officer

2.5.3 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

New Mexico Environmental Department (NMED)
New Mexico OSHA
Bernalillo County Health Department
City of Albuquerque, NM

4. Personnel On Site

START Contractor:	Dynamac Corporation
ERRS Contractor:	Environmental Quality Management, Inc. (EQM)
ERRS Subcontractors:	Bandera Resources United States Environmental Services (USES)

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

No information available at this time. Upon completion and approval of the Removal Report and Attachments, these documents will be made available as appropriate.

6.2 Reporting Schedule

A Draft of the Removal Report is expected to be submitted on March 9, 2012. Upon EPA (OSC) review of this submittal, the START-3 Contractor will make any necessary changes and submit a Final version of the Removal Report to the EPA OSC. The submittal date of the Final version of the Removal Report is expected to be early April.

7. Situational Reference Materials

No information available at this time.