



TETRA TECH

April 26, 2012

Mr. David Andrews
On-Scene Coordinator
U.S. Environmental Protection Agency Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

**Subject: Final Glove Bag Removal Work Plan
Liberty Fibers Emergency Response
EPA Contract No. EP-W-05-054 (START III Region 4)
Technical Direction Document (TDD) No. TTEMI-05-001-0126**

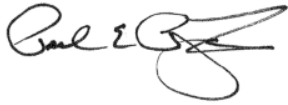
Dear Mr. Andrews:

In accordance with your direction, the Tetra Tech Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) is submitting the enclosed final Glove Bag Removal Work Plan to summarize activities to be conducted in support of the Liberty Fibers Emergency Response site located in Morristown, Hamblen County, Tennessee. This work plan provides a summary of the glove bag removal operations as understood by Tetra Tech at the time of this submittal. Although Tetra Tech will not be responsible for implementation and enforcement of the work plan, we will monitor compliance with the plan on behalf of the U.S. Environmental Protection Agency (EPA) and provide technical support, including updating the work plan based on changes in operations and site conditions, as well as any appropriate modifications based on recommendations or direction from EPA. Future removal activities not covered in this work plan will be addressed in subsequent work plans.

Tetra Tech understands that removal activities involving the use of alternative asbestos control measures (AACM) for the removal of overhead pipes located throughout the site prior to the removal of the asbestos-containing materials (ACM), the Emergency Response and Removal Services (ERRS) contractor, CMC, Inc. (CMC), will be responsible for writing a work plan detailing the use of AACM for the removal of these pipes in accordance with the requirements specified in 29 Code of Federal Regulation (CFR) 1926.1101(g)(6). If requested by EPA, Tetra Tech will review and provide comments on such work plans.

Please call Paul Prys at (678) 775-3106 or Bryan Erickson at (816) 225-4030 if you have any questions regarding this report.

Sincerely,



Paul Prys
START III Project Manager



Andrew F. Johnson
START III Program Manager

Enclosure

cc: Katrina Jones, EPA Project Officer
Brian Croft, Tetra Tech START III Task Order Manager
Angel Reed, Tetra Tech START III Document Control Coordinator

FINAL
GLOVE BAG REMOVAL WORK PLAN

LIBERTY FIBERS EMERGENCY RESPONSE
MORRISTOWN, HAMBLLEN COUNTY, TENNESSEE

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 4
Atlanta, Georgia 30303



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TDD No.	:	TTEMI-05-001-0126
Date Prepared	:	April 26, 2012
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1.0 INTRODUCTION

Under Superfund Technical Assessment and Response Team (START) Contract Number (No.) EP-W-05-054, Technical Direction Document (TDD) No. TTEMI-05-001-0126, the U.S. Environmental Protection Agency (EPA) tasked Tetra Tech EM Inc. (Tetra Tech) to prepare this final Glove Bag Removal Work Plan to summarize activities to be conducted in support of the Liberty Fibers Emergency Response site located in Morristown, Hamblen County, Tennessee. This work plan provides a summary of the glove bag removal operations as understood by Tetra Tech at the time of this submittal. Although Tetra Tech will not be responsible for implementation and enforcement of the work plan, we will monitor compliance with the plan on behalf of EPA and provide technical support, including updating the work plan based on changes in operations and site conditions, as well as any appropriate modifications based on recommendations or direction from EPA. The goal of this work plan is to define procedures to safely remove and dispose of intact and/or damaged asbestos-containing pipe insulation from structures located on site.

Tetra Tech understands that removal activities involving the use of alternative asbestos control measures (AACM) for the removal of overhead pipes located throughout the site prior to the removal of the asbestos-containing materials (ACM), the Emergency Response and Removal Services (ERRS) contractor, CMC, Inc. (CMC), will be responsible for writing a work plan detailing the use of AACM for the removal of these pipes in accordance with the requirements specified in 29 Code of Federal Regulation (CFR) 1926.1101(g)(6). If requested by EPA, Tetra Tech will review and provide comments on such work plans.

1.1 Scope of Work

EPA issued TDD No. TTEMI-05-001-0126 to conduct the removal and disposal of asbestos-contaminated demolition debris, associated contaminated soil, and damaged and exposed asbestos-containing materials throughout the site. Removal and disposal activities at the Liberty Fibers Emergency Response site will be performed in accordance with Title 40, Code of Federal Regulations (CFR), Section 61 (40 CFR 61), National Emission Standards for Hazardous Air Pollutants (NESHAP) and 29 CFR 1926.1101, Safety and Health Regulations for Construction, Toxic and Hazardous Substances, Asbestos, as well as Tennessee Department of Environment and Conservation (TDEC) Division of Air Pollution Control regulations. This work plan focuses on the glove bag removal and disposal of exposed and damaged ACM from overhead pipes located in partially demolished buildings that are structurally stable and from exterior

overhead pipes located throughout the site. The exposed and damaged ACM from these overhead pipes will be addressed first in order to minimize the potential release of fibers to the surrounding areas. This work plan will also address the removal of the overhead pipes and any additional glove bag removal of intact ACM associated with these pipes prior to removal. Removal of the overhead pipes and the additional glove bag removal of any intact ACM will be determined by EPA at a later date. Glove bag and overhead pipe removal operations will not be performed in undamaged, structurally stable buildings or in partially demolished buildings that are structurally unstable. This work plan will address the implementation of procedures for the removal and disposal of overhead asbestos-containing pipe insulation and pipes, as well as many of the health and safety concerns, including personnel decontamination and work greater than six feet in the air. Future removal activities not covered in this work plan will be addressed in subsequent work plans.

1.2 Background Information

The Liberty Fibers Emergency Response site is located at 4855 Enka Highway, Morristown, Hamblen County, Tennessee. The site occupies approximately 300 acres and is bordered by a small residential community to the north, landfills and a retention pond to the east, the inactive nylon and polyester staple plants to the south, and a water treatment plant and farmland to the west.

The Liberty Fibers site is a former rayon fiber manufacturer. According to a briefing memorandum prepared by TDEC, Liberty Fibers filed for bankruptcy in September 2005. A&E Salvage Company (formerly J&N Salvage Company) bought the salvage rights to the Liberty Fibers property in October 2006. The salvage rights include any and all equipment and materials located on the property and the option to purchase the property.

In September 2006, TDEC, in coordination with the EPA, conducted a site visit in response to a tip TDEC received regarding demolition activities and the presence of hazardous materials, including polychlorinated biphenyls (PCBs) on site. During the site visit, TDEC observed approximately 24 transformers and 80 capacitors that were labeled as containing PCBs. Also in September 2006, the Commissioner of TDEC received a letter from the Mayor of Hamblen County expressing his concern about the potential for release of on-site PCBs, asbestos, and other chemicals during the ongoing salvage operations at the site. During a discussion among the EPA personnel, A&E Salvage Company personnel, a Liberty Fibers representative, the court-appointed trustee, and TDEC personnel in October 2006, A&E Salvage Company acknowledged that it was the owner of the PCB equipment and that it would accept full

legal responsibility for proper removal and disposal of the PCB equipment in compliance with appropriate regulations.

A&E Salvage Company submitted a plan to the EPA in January 2007 for sampling and removal of all transformers and capacitors located on site. A&E Salvage Company contracted SD Myers to sample the dormant on-site transformers and capacitors and submit the samples for PCB analysis. The energized transformers and capacitors could not be sampled, however, until Morristown Utilities ran new service to the site. SD Meyers sampled 39 transformers: four transformers were found to contain PCBs, 12 units were found contaminated with PCBs, and 23 units did not contain PCBs. A&E Salvage Company also contracted Booher Industrial Company of Jasper, Georgia, to remove and dispose of the transformers; however, the EPA later informed A&E Salvage Company that Booher Industrial Company was not an EPA-approved commercial storage and disposal facility for PCB-regulated waste.

In March 2007, A&E Salvage Company held a meeting with IPI Business and Morristown Utilities, during which the City of Morristown decided to annex the Liberty Fibers site and include the site as part of its Urban Growth Boundaries. As a result, the City of Morristown would be responsible for providing utility services, including power and water, to the Liberty Fibers site.

In March 2008, the EPA Resource Conservation and Recovery Act (RCRA) and Oil Pollution Act Enforcement and Compliance Branch contacted the Emergency Response and Removal Branch regarding conducting a removal assessment of the facility. EPA On-Scene Coordinator (OSC) Spurlin contacted the EPA and TDEC representatives involved with the facility to discuss the site and review documentation. OSC Spurlin, supported by Tetra Tech, as well as representatives from TDEC, the EPA Asbestos, the EPA RCRA Division, and the EPA Toxic Substances Control Act Enforcement programs, coordinated a site visit for March 20 and 21, 2008. EPA and Tetra Tech were joined by Mr. Mark Sawyer, a local investor in A&E Salvage Company, and Mr. Tom Montgomery, a former employee of Liberty Fibers Corporation. During the site visit, EPA and Tetra Tech observed several drums, totes, and tanks; bags labeled as “asbestos containing material”; a 50,000-gallon sulfuric acid tank containing approximately 8 inches of product; known and suspect PCB-containing articles and oils; suspect asbestos-containing material (ACM); and discolored soil throughout the property. In addition, Mr. Montgomery identified the on-site concrete vault that contains six 10,000-gallon tanks used to store carbon disulfide, an extremely flammable chemical used in manufacturing rayon. The vault is typically filled with water, submerging the tanks, to reduce the risk of fire and explosion. Mr. Montgomery also identified a leak in the western wall of the vault, as a result of which the tanks were only half submerged.

In December 2009, EPA OSC Gaughan, Tetra Tech personnel, and TDEC personnel conducted another site visit with Mr. Sawyer. During the site visit, Mr. Sawyer informed EPA and Tetra Tech that the carbon disulfide tanks within the concrete vault had not contained any product, had been removed from the vault sometime in the spring of 2009, and had been sold for scrap metal. The tanks had been removed because of potential for explosion. Currently, the water that submerged the tanks remains in the vault. The Power Mechanical Shop contains bagged asbestos waste, and the Welding Shop contains PCB-contaminated transformers and capacitors. Although the facility was partially demolished, the debris fields - mixed with presumed ACM - remained. Recycling and reclamation operations were ongoing, and at least one metals recycling business was currently operating on site.

From January 18 through 22, 2010, Tetra Tech START conducted a removal assessment (RA) of the site. The RA consisted of six primary objectives: collecting bulk asbestos samples; conducting a geophysical investigation in an attempt to identify the locations of possible buried transformers; collecting aqueous and solid waste samples from the carbon disulfide tank vault and surrounding area; collecting solid waste samples from two neutralization pits; collecting waste samples from on-site drums and totes; and collecting personal and area air samples for Phase Contrast Microscopy (PCM) analysis to evaluate the level of exposure of site personnel to airborne asbestos fibers during the assessment and to determine the level of concentration of airborne asbestos fibers that may be migrating off site.

On April 21, 2010, EPA and Tetra Tech START conducted an emergency response site assessment in response to a debris fire on site. The fire occurred in the foundation of a demolished cooling tower located on the west side of the site. On April 29, 2010, Tetra Tech START conducted a visual assessment of presumed ACM in the remaining tenant buildings on site.

On March 17, 2011, EPA and Tetra Tech START conducted a drainage assessment at the Liberty Fibers Rayon Plant and the potential effects on various buildings located at the Nylon Staples Plant.

2.0 ASBESTOS REMOVAL ACTIVITIES

The asbestos removal activities conducted in work area (also known as the Exclusion Zone) at the Liberty Fibers Emergency Response site identified in this work plan will be performed by CMC, Inc. (CMC), the EPA Emergency Response and Removal Services (ERRS) contractor. All CMC personnel involved with the glove bag removal activities will be State of Tennessee-accredited asbestos workers and supervisors

as appropriate based on their assigned tasks. The asbestos removal activities addressed in this work plan are as follows and will be discussed in the subsequent paragraphs:

- Pre-removal preparations
- Removal of asbestos-containing pipe insulation and overhead pipe
- Waste disposal
- Entry and exit of work area

2.1 Pre-removal Preparations

In preparation for asbestos glove bag removal activities at the Liberty Fibers Emergency Response site, CMC will procure glove bags that meet the requirements identified in 29 CFR 1926.1101. Glove bags will be made of six-millimeter (mil) thick plastic and are seamless at the bottom. CMC personnel will visually inspect the area where glove bag removal operations will be conducted and remove all asbestos-contaminated demolition debris from the work area to ensure there is a safe and level working surface. Loose ACM in each work area will be placed in a six-mil plastic bag, sufficiently wetted, sealed, and placed in a second six-mil plastic bag and sealed. All bags will be labeled in accordance with 29 CFR 1926.1101(k)(8) and of sufficient size and contrast so as to be readily visible and legible. CMC personnel will determine the appropriate equipment to be used to reach and remove the asbestos-containing pipe insulation (i.e. aerial lift) and ensure the proper fall protection is on site for use during glove bag operations greater than a height of six feet.

2.2 Removal of Asbestos-Containing Materials from Overhead Pipes

Glove bag removal activities at the Liberty Fibers Emergency Response site is defined as Class I work in 29 CFR 1926.1101. Removal activities will be performed on various types of ACM found on exposed or damaged pipes, to include straight runs, elbows, and valves, located in partially demolished buildings that are structurally stable and from exterior overhead pipes located throughout the site. The exposed and damaged ACM from these overhead pipes will be addressed first in order to minimize the potential release of fibers to the surrounding areas. Most glove bag operations will be performed at a height of greater than six feet and will require the use of a two-man aerial lift and fall protection. Prior to installing the glove bags, CMC personnel will place a six-mil plastic drop cloth below the work area, stabilize the exposed and damaged insulation by wrapping it with two layers of six-mil plastic sheeting, and sealing it with spray glue and duct tape to prevent fiber releases during glove bag removals. In the event CMC is able to install a glove bag or glove bags without disturbing the exposed or damaged insulation,

CMC will not need to wrap the effected overhead pipes with two layers of six-mil plastic sheeting prior to glove bag removals.

Each glove bag or set of glove bags will be installed so that it completely covers the circumference of the overhead pipe where the work is to be done. Once the glove bag or glove bags have been installed, they will be visually inspected by a State of Tennessee-accredited asbestos project monitor and smoke tested to ensure that the glove bags are properly sealed. All glove bag operations will be performed by two CMC personnel using an aerial lift and fall protection. CMC personnel will sufficiently wet all ACM or presumed asbestos-containing material (PACM) inside the glove bag prior to removal. Once removal inside the glove bag has been completed, the removal area will be visually inspected by the State of Tennessee-accredited asbestos project monitor. CMC personnel will spray the cleaned portion of the overhead pipe and exposed ends of remaining pipe insulation with an encapsulant. The tools used inside of the glove bag will then be removed by placing the tools in one of the plastic glove/sleeve assemblies inside of the glove bag and pulled inside out. The sleeve will be twisted to separate the tools from the removal debris, the twisted area will be securely wrapped with duct tape, cut in the center of the taped area, and removed. CMC personnel will collapse the glove bag using a high efficiency particulate air (HEPA) vacuum cleaner, twist the bag to separate the removed material from the cleaned pipe, duct tape the twisted area, cut in the center of the taped area to remove the bag from the pipe while maintaining a seal, and place the waste portion of the glove bag into a second six-mil plastic bag for disposal. The exposed ends of the remaining pipe insulation will be sealed (i.e. wrapped with six mil plastic sheeting and duct tape or other acceptable means) to prevent the possibility of fiber release. As long as the exposed ends of the remaining pipe insulation have been sufficiently sprayed with an encapsulant, the exposed ends may be sealed immediately after the removal of the glove bags. All glove bags will be placed into an off-road articulated dump truck and transported to the on-site landfill for disposal. If transport to the on-site landfill is unavailable, CMC will stage the glove bags on a six-mil plastic tarp and covered until transport is available. All bags will be labeled in accordance with 29 CFR 1926.1101(k)(8) and of sufficient size and contrast so as to be readily visible and legible.

For overhead pipe with asbestos-containing insulation located in the Exclusion Zone that is intact and undamaged, EPA, with recommendations from a State of Tennessee-accredited asbestos project monitor, will determine what actions are necessary to ensure the stability of the remaining insulation and whether or not the overhead pipe and remaining insulation will be removed under this project.

For the overhead pipes identified by EPA for removal and disposal, CMC will conduct additional glove

bag removal of intact ACM (i.e. located beneath the metal jacket) at intervals sufficient to safely cut, remove, and transport the overhead pipes to the site landfill for disposal. Glove bag removals will be conducted in the same manner as described in the above paragraphs of this section. Once the glove bag removals have been completed at intervals necessary to safely cut, remove, and dispose of the overhead piping, CMC will inspect the metal jacketing located on top of the remaining intact ACM insulation for breeches (i.e. gouges, openings in the seams, etc.). These breeches will either be sufficiently sprayed with an encapsulant or sealed using duct tape, plastic sheeting, or an approved adhesive in order to prevent any fiber release during removal. Once the breeches have been secured, CMC will cut the overhead pipe in the center of the areas where the ACM was removed. The piping will be stabilized using a tracked excavator or other appropriate equipment during cutting. Once cutting has been completed, the piping will be secured to the appropriate equipment, lowered to the ground, and the remaining intact pipe insulation will be wrapped in two layers of six-mil plastic sheeting and sealed with duct tape. The piping will be placed into an off-road articulated dump truck, and transported to the on-site landfill for disposal. If transport to the on-site landfill is unavailable, CMC will stage the removed pipe sections on a six-mil plastic tarp and cover until transport is available. All wrapped piping will be labeled in accordance with 29 CFR 1926.1101(k)(8) and of sufficient size and contrast so as to be readily visible and legible.

2.3 Waste Disposal

Waste generated during glove bag and overhead pipe removal activities will be disposed of in the landfill located approximately 0.3 miles east of the facility in a former on-site retention pond. Off-road articulating dump trucks will transport the glove bag and overhead pipe removal waste to the landfill for disposal. The dump trucks will follow a designated route through the site to the landfill as identified by the EPA. CMC will record the number of truckloads, as well as the amount and type of waste deposited into the landfill each day. At the completion of each work day, CMC will cover the asbestos-contaminated demolition debris in such a manner as to prevent the release of airborne fibers (i.e. six inches of soil or an EPA-approved encapsulant).

All wastes generated by CMC personnel during general work and decontamination activities will be placed into a six-mil plastic bag, sufficiently wetted prior to sealing the bag with duct tape, and placed into an off-road articulated dump truck for transport to the on-site landfill for disposal. If transport to the on-site landfill is unavailable, CMC will stage the disposal bags on a six-mil plastic tarp and cover until transport is available. All disposal bags will be labeled in accordance with 29 CFR 1926.1101(k)(8) and of sufficient size and contrast so as to be readily visible and legible.

Decontamination of tools and other equipment used during and associated wastes generated from glove bag operations are addressed in a separate site specific work plan.

2.4 Entry and Exit of Work Areas

CMC personnel will enter and exit the Exclusion Zone through the Contamination Reduction Zone in accordance with 29 CFR 1926.1101 and the CMC site-specific health and safety plan (HASP). Each CMC employee will sign in and out prior to entering and after exiting the Exclusion Zone. Since all glove bag and overhead pipe removal activities will be conducted outside, CMC will adopt different procedures for entry and exit of the work area for operations conducted in cold weather and in hot weather.

2.4.1 Entry and Exit of Work Area - Cold Weather Activities

During cold weather work activities, CMC personnel will enter into the clean change area wearing “street clothing” and steel-toed boots. All CMC personnel will place the following protective equipment over their clothing and steel-toed boots prior to entering the Exclusion Zone: two Tyvek® or similar protective suits with head covers; a full-face respirator fitted with P100 [formerly known as high-efficiency particulate air (HEPA)] cartridges; two layers of nitrile gloves; waterproof, disposable booties; and work gloves, if needed. Steel-toed boots may be replaced with steel-toed rubber boots that are easily decontaminated. Duct tape will be used to seal any openings located around the face, hands, and feet.

When exiting the Exclusion Zone through the Contamination Reduction Zone, CMC personnel will first shower and/or spray the outer protective suit and the disposable booties or steel-toed rubber boots with water to remove any gross contamination. If the disposable booties or steel-toed rubber boots need additional decontamination, CMC personnel will enter the boot wash area to remove all remaining debris prior to entering the decontamination line. Outer protective suits, boot covers or steel-toed rubber boots, and gloves will be removed in the decontamination line outside of the equipment room and placed in a six-mil plastic bag for disposal. The inner protective suit will be removed in the equipment room and placed in a six-mil plastic bag for disposal. Prior to entering the shower area, CMC personnel will clean their work clothes using a HEPA vacuum, continue to the respirator decontamination station to triple rinse the respirators, proceed to the shower room for additional decontamination, as needed, and then enter the clean room wearing their “street clothing”.

2.4.2 Entry and Exit of Work Area - Hot Weather Activities

During hot weather work activities, CMC personnel will enter into the clean change area, remove “street clothing”, and dress in one Tyvek® or similar suit with head cover; a full-face respirator fitted with P100 [formerly known as (HEPA)] cartridges; two layers of nitrile gloves; steel-toed boots covered with waterproof, disposable booties; two layers of nitrile gloves; and work gloves, if needed. Additional clothing, that is easily decontaminated, may be worn underneath the suits (i.e. swim wear or neoprene shorts) when appropriate. Steel-toed boots may be replaced with steel-toed rubber boots that are easily decontaminated. Duct tape will be used to seal any openings located around the hands and feet.

When exiting the Exclusion Zone through the Contamination Reduction Zone, CMC personnel will first shower and/or spray the protective suit and the disposable booties or steel-toed rubber boots with water to remove any gross contamination. If the disposable booties or steel-toed rubber boots need additional decontamination, CMC personnel will enter the boot wash area to remove all remaining debris prior to entering the decontamination line. Boot covers or steel-toed rubber boots, and gloves will be removed in the decontamination line outside of the equipment room and placed in a six-mil plastic bag for disposal. The protective suit will be removed in the equipment room and placed in a six-mil plastic bag for disposal. CMC personnel will proceed to the shower room while wearing the respirator for additional decontamination and then enter the clean room to change back into their “street clothing”.

3.0 SCHEDULE

CMC will provide a schedule of work activities to EPA prior to the start of removal activities. The schedule will include the estimated number of days it will take to complete removal activities in a specific work area and the approximate quantity of waste to be removed. The schedule, as well as any necessary changes, will be approved by EPA.

4.0 SITE MANAGEMENT

The following list identifies key personnel associated with this project:

NAME	ORGANIZATION/ROLE	CONTACT INFORMATION
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Mr. Paul Prys	Tetra Tech START Project Manager	1955 Evergreen Boulevard Building 200, Suite 300 Duluth, GA 30096 (678) 775-3106 paul.prys@tetrattech.com
Mr. Bryan Erickson	Tetra Tech START Site Manager	415 Oak St. Kansas City, MO 64106 (816) 225-4030 bryan.erickson@tetrattech.com
Mr. Rick Hollingsworth	CMC ERRS Site Project Manager	1151 Jessamine Station Road Nicholasville, KY 40356 (859) 333-3644 cmcrickh@aol.com

5.0 HEALTH AND SAFETY

CMC will provide accredited workers and supervisors that meet the requirements of 40 CFR 763, Appendix C to Subpart E, the EPA Model Accreditation Plan, and TDEC Chapter 1200-01-20 Asbestos Accreditation Requirements. CMC will implement medical surveillance and respiratory protection programs in accordance with 29 CFR 1926.1101 and 29 CFR 1910.134. Personal air monitoring will be conducted by designated CMC personnel during glove bag and overhead pipe removal activities. All personal air monitoring will be conducted in the breathing zone to assess potential exposures to airborne asbestos fibers. Additional information pertaining to site air monitoring is located in the CMC site-specific HASP.