UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

MAY 10 2011

OFFICE OF
ENVIRONMENTAL CLEANUP

SUBJECT: Ceiling Increase and Change in the Scope of Response Amendment to the Action Memorandum for the Emergency Removal Action at the Orofino Asbestos Site, Orofino, Clearwater County, Idaho

FROM: Earl Liverman, Federal On-Scene Coordinator
Emergency Response Unit

THRU: Chris D. Field, Manager
Emergency Management Program

TO: Daniel D. Opalski, Director
Office of Environmental Cleanup

I. PURPOSE

The purpose of this Action Memorandum is to document approval of a ceiling increase and change in the scope of response for the Orofino Asbestos Site (Site) in Orofino, Clearwater County, Idaho.

The ceiling increase will bring the total project ceiling to $1,176,000 and the change in the scope of response will provide for an interim gravel barrier to be placed on certain properties until a final cleanup action can be implemented during 2011.

II. SITE CONDITIONS AND BACKGROUND

The CERCLIS ID No. is IDN001002885 and the Site ID No. is 10JN.

A. Site Description

1. Removal site evaluation

The original Action Memorandum (dated 30 September 2010) identified seven locations, including property also known as the Riverview Construction Asbestos Site. Since the removal action was started on 13 October 2010, the U.S. Environmental Protection Agency (EPA) has identified an additional fifteen locations where asbestos contaminated soil was placed as fill material (or was suspected to have been placed) as part of the 2008 Phase II and 2009 Phase III construction of waterline improvements for the Riverside Water and Sewer District (District) in the City of Orofino and Clearwater

County. Further, EPA discovered many scattered pieces of suspected asbestos cement pipe (ACP) laying on the ground surface along public rights-of-way (ROW) where the Phase II and Phase III waterline improvements occurred. As described in the original Action Memorandum, the size of pieces of ACP varied in length and width, and all pieces appeared weathered, the edges were crumbled, and potential asbestos fibers were observed at the edges.

All currently known locations are summarized below in Table 1 and attached Figure 1. The 15 locations labeled "Locations Discovered During Fall 2010 Cleanup" are the subject of this Amendment and the locations labeled as "2011 Work" will be the subject of a separate Amendment.

Table 1
Summary – Orofino Asbestos Locations

07/22/10 AM Location	**2010 Work**	**2011 Work**
12976 Highway 12	Interim Cover	X
09/30/10 AM Locations	**2010 Work**	**2011 Work**
12586 Hartford Avenue	X	
14228 Highway 12	X	
256 2nd Street	X	
131 122nd Street	X	
291 118th Street	Interim Cover	X
4753 Transfer Station Road	Interim Cover	X
Locations Discovered During Fall 2010 Cleanup	**2010 Work**	**2011 Work**
12140 Hartford Avenue	Interim Cover	X
12170 Hartford Avenue		X
12453 Hartford Avenue		X
12517 Hartford Avenue	Interim Cover	X
12611 Hartford Avenue	X	
12719 Hartford Avenue		X
12742 Hartford Avenue		X
12154 Indio Avenue	X	
12252 Indio Avenue	X	
12253 Indio Avenue	X	
12474 Indio Avenue	X	
12742 Jerome Avenue	X	
119th Street	X	
130 122nd Street		X
10820 Highway 12	X	

A delay in action or no action at the fifteen locations would have increased the actual or potential threats to the public health or welfare and/or the environment associated with exposure to asbestos fibers.

2. Physical location

The additional fifteen locations where soil containing ACP or transite siding was placed as fill material are located within the City of Orofino or immediately outside the City limits in Clearwater County.

3. Site characteristics

Refer to original Action Memorandum.

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

Refer to original Action Memorandum.

5. NPL status

Refer to original Action Memorandum.

6. Maps, pictures, and other graphic representations

Refer to attached Figure 1.

B. Other Actions to Date

1. Previous actions

Refer to original Action Memorandum.

2. Current actions

EPA started cleanup activities on 13 October 2010 and completed the work on 3 November 2010.

C. State and Local Authorities' Roles

1. State and local actions to date

Refer to original Action Memorandum.

2. Potential for continued State/local response

Refer to original Action Memorandum.

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

Refer to original Action Memorandum.

IV. ENDANGERMENT DETERMINATION

Refer to original Action Memorandum.

V. CLEANUP ACTIONS AND ESTIMATED COSTS

The following emergency removal action was based on the discovery of additional locations where asbestos contaminated soil was placed as fill material as part of the 2008 Phase II and 2009 Phase III construction of waterline improvements for the District and the discovery of ACP laying on the ground surface along public ROWs where the Phase II and Phase III waterline improvements occurred.

1. Cleanup Action Description

Excavation and Disposal of Asbestos Contaminated Materials

At eight of the fifteen additional locations shown in Table 1, asbestos contaminated soil placed as fill material was excavated to the underlying native material, and this material was shipped off-site for disposal at a facility operating in compliance with the Resource Conservation and Recovery Act and other applicable Federal or state requirements. The native material was determined visually, and the excavated area was over-excavated by no more than an additional 6 inches to ensure that all asbestos was removed. One or more composite random soil samples were collected and analyzed using Polarized Light Microscopy analysis to confirm removal of asbestos. Because the eight additional locations involved residential properties, the excavated material was replaced with a similar quantity of clean material and was graded to ensure proper surface water drainage, and seeded where appropriate. Five of the remaining seven locations were postponed until 2011 because the landowners could not be contacted or because the encroaching fall and winter weather prevented removal of the contaminated materials. A final cleanup action is anticipated to be implemented during 2011.

All asbestos contaminated materials and soil were properly handled, packaged, and transported to an approved National Emissions Standards for Hazardous Air Pollutants (NESHAP) asbestos landfill. The contaminated material was disposed of at a facility in compliance with the Off-Site Rule set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), at 40 CFR 300.440.

Construction of Interim Gravel Barriers

An interim 4-inch gravel barrier was constructed at the remaining two locations shown in Table 1 where thousands of cubic yards of asbestos contaminated soil were placed as fill material. Encroaching fall and winter weather similarly prevented removal of contaminated materials from these locations. A final cleanup action is anticipated to be implemented during 2011.

Removal of ACP from Public ROWs

The public ROWs where the District constructed the 2008 Phase II and 2009 Phase III waterline improvements were surveyed for ACP laying on the ground surface. The ACP was removed where found and disposed of along with other contaminated material as described above. The public ROWs will likely be surveyed again during the 2011 removal action.

Additional Disposal and Sampling Locations

EPA continues to investigate where contaminated fill material may have been placed as part of the 2008 and 2009 waterline improvements for the District. If other locations are identified, those locations will be evaluated and may be included within the scope of the 2011 removal action. Additionally, EPA may sample interior dust at certain locations to investigate whether asbestos fibers were released to the air during Phase II and Phase III construction activities.

Best-Management Practices (BMPs):

Temporary Best Management Practices (BMPs) were implemented during cleanup activities to protect workers and the public from short-term construction impacts such as erosion, fugitive dust, and other similar potential impacts.

Post removal site controls

Post removal site controls are not required because all asbestos contaminated materials and soils were or are expected to be removed. However, if contaminated materials are left on-site, a restrictive covenant will be imposed to prohibit activities that may interfere with the cleanup action, operation and maintenance, or monitoring or that may result in the release of asbestos that was contained as part of the cleanup action. Additionally, a long-term monitoring, maintenance and repair program will be implemented to ensure the continuing effectiveness of the removal action and to monitor Site conditions.

2. Contribution to remedial performance

Refer to original Action Memorandum.

3. Applicable or relevant and appropriate requirements (ARARs)

Refer to original Action Memorandum.

4. Project schedule

EPA started the original cleanup activities on 13 October 2010 and completed all activities on 3 November 2010.

5. Remaining asbestos contaminated sites

As noted in Table 1, the ten locations labeled as "2011 Work" will be the subject of a separate amendment to the Action Memorandum. Any additional locations discovered during the 2011 work will likely also be addressed during 2011.

B. Estimated Costs

EPA extramural costs for conducting the removal action described herein are estimated below:

Extramural Costs	Current Ceiling	Proposed Increase	Proposed Ceiling
Regional Allowance Costs ERRS Contractor	$650,000	$200,000	$850,000
Other Extramural Costs Not Funded from the Regional Allowance START Contractor	$50,000	$80,000	$130,000
Subtotal Extramural Costs	$700,000	$280,000	$980,000
Extramural Cost Contingency (20%)	$140,000	$56,000	$196,000
Total Removal Action Project Ceiling	$840,000	$336,000	$1,176,000

The project ceiling does not include estimates of other costs -- such as intramural direct labor, travel, and indirect costs, and subsequent enforcement costs -- that are recoverable under Section 107 of CERCLA.

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

Refer to original Action Memorandum.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

Refer to attached confidential enforcement addendum.

IX. RECOMMENDATION

This decision document sets forth the selected removal action for the Orofino Asbestos Site located in Orofino, Clearwater County, Idaho, that has been developed in accordance with CERCLA, and is consistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Site continue to meet the NCP 40 C.F.R. § 300.415(b) criteria for a removal action and I recommend your approval with the ceiling increase of $336,000 and change in scope of the removal action. Of the estimated costs, as much as $850,000 comes from the Regional Removal Allowance.

X. APPROVAL/DISAPPROVAL

✓ Approval

for Daniel D. Opalski, Director
Office of Environmental Cleanup

5/18/11
Date

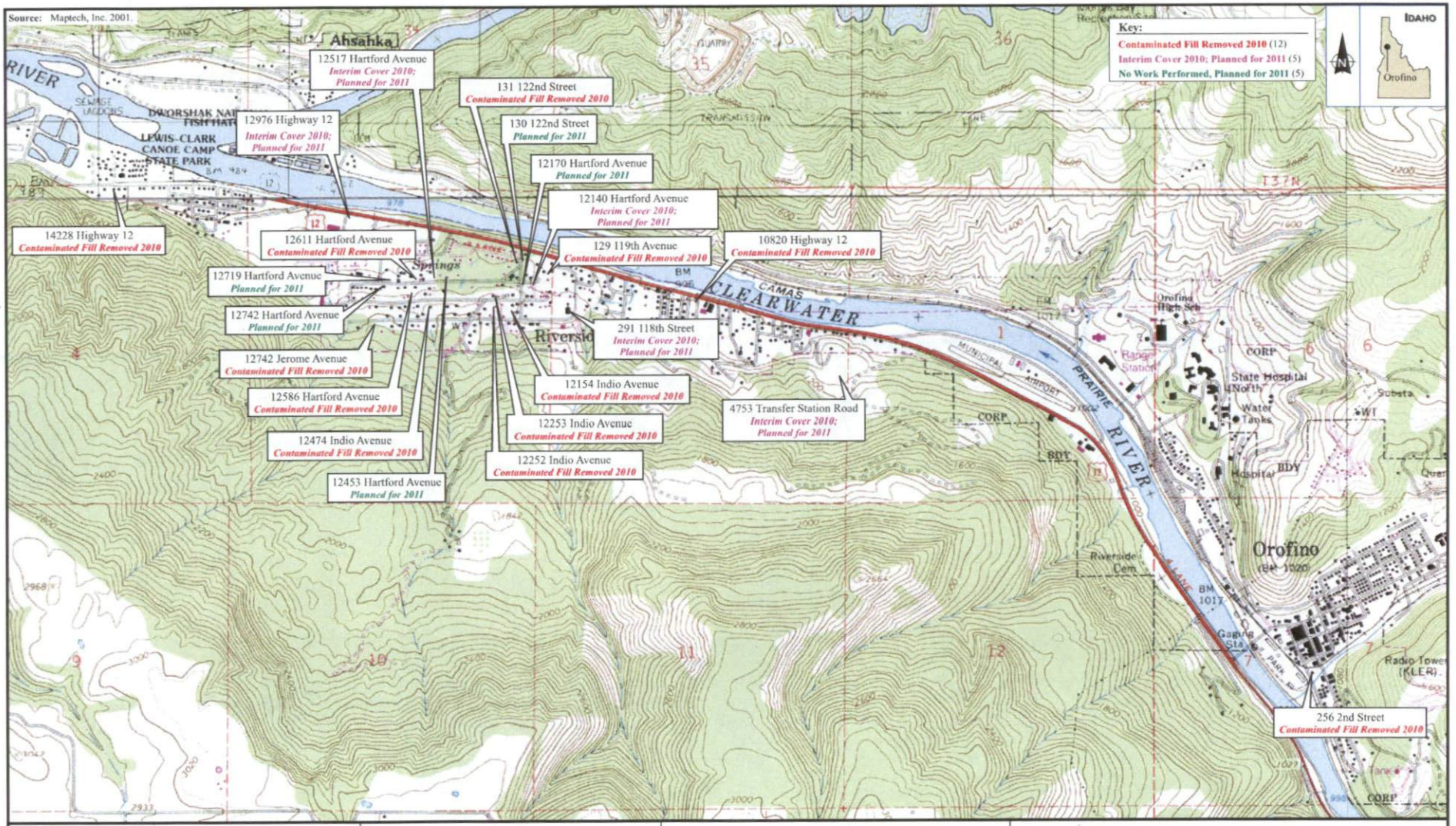
____ Disapproval

_____
Daniel D. Opalski, Director
Office of Environmental Cleanup

_____
Date

XI. ATTACHMENTS

- Confidential Enforcement Addendum
- Figure 1- Property Status at the End of 2010



ecology and environment, inc.
Global Specialists in the Environment
Seattle, Washington

0 1600 3200
Approximate Scale in Feet

OROFINO ASBESTOS SITE
Orofino, Idaho

Figure 1
PROPERTY STATUS AT THE END OF 2010

Date:	Drawn by:	
5/10/11	AES	10:START-3\10080001\fig 1