



REGION 8

DENVER, CO 80202

ACTION MEMORANDUM

SUBJECT: Action Memorandum for a Removal Action at the West Acres Asbestos Site

FROM: Taylor Bowker, OSC
Response Section

THRU: Kerry Guy, Supervisor
Response Section

Deirdre Rothery, Manager
Emergency Management Branch

TO: Aaron Urdiales, Director
Superfund and Emergency Management Division

I. Purpose

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the West Acres Asbestos Site (Site) located in Steamboat Springs, Routt County, Colorado. This emergency response will involve the cleanup and proper disposal of asbestos containing material (ACM) from two fire-damaged and collapsed mobile homes in the West Acres Trailer Court. Conditions existing at the Site present a threat to public health or welfare or the environment and meet the criteria for initiating a removal action under 40 CFR 300.415(b)(2) of the National Contingency Plan (NCP).

II. Site Information

A. Site Description

Site Name: West Acres Asbestos
Site Spill ID (SSID): B8M6
NRC Case Number: N/A
CERCLIS Number: CON000826471
Site Location: 2990 W Acres Dr, Steamboat Springs, CO 80487
Lat/Long: 40.507151, -106.866706
NPL Status: Non-NPL
Removal Start Date: 12/20/2024

B. Site Background

1. Site Evaluation

On June 17, 2024, a private aircraft flying in the vicinity of the Bob Adams Airport crashed into the West Acres Trailer Court in Steamboat Springs, Colorado. The pilot and passenger were killed, and two mobile homes were destroyed from the crash and subsequent fire.

Colorado Department of Public Health and Environment (CDPHE) Air Pollution Control Division conducted an inspection for asbestos containing building materials on both properties in August and September of 2024. Results from the inspection, available in the administrative record, confirmed the presence of friable asbestos in building components of the partially collapsed mobile homes and in the rubble scattered throughout the properties. Consequently, CDPHE has requested EPA assistance with the removal of asbestos containing materials (ACM) on this Site.

On December 12, 2024, an EPA Federal On-Scene Coordinator (OSC) and removal manager met at the Site with Routt County representatives. The Site was covered in snow, but remnants of the crash and fire were visible including the partially collapsed mobile homes and debris scattered throughout the properties.

2. Physical location and Site characteristics

The Site is located northeast of downtown Steamboat Springs in the West Acres Trailer Court and includes two mobile homes located at 61 West Acres Drive, Steamboat Springs, Colorado and 62 West Acres Drive, Steamboat Springs, Colorado. A map of the West Acres Trailer Court can be seen in Attachment 1 of this Action Memorandum.

According to the 2020 census, the City of Steamboat Springs has a population of 13,224 over an area of 9.89 square miles.

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

The known contaminant of concern at the Site is asbestos, which is a hazardous substance as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). There has been a release of friable asbestos into the environment from the asbestos-contaminated building materials at the Site. As the remains of the mobile homes continue to deteriorate from weather and structural collapse, there is a threat of additional releases of asbestos fibers into the environment. These fibers could migrate off-Site and pose an asbestos inhalation threat to nearby residents and community members.

Asbestos is a solid material with a variety of forms, including chrysotile, which was found at the Site. Asbestos is highly resistant to heat and has exceptional tensile strength, both of which are characteristics that lend themselves to use in ordinary building materials. Asbestos tends to become brittle over time shattering into fiber bundles due to age and weathering. This characteristic is referred to as being friable.

Subsequently, the friable fiber bundles can further degrade into microscopic fibers that can become airborne. Human exposure to airborne asbestos fibers via inhalation has been proven to cause asbestosis, cancer, mesothelioma, and other respiratory diseases.

III. Threats to Public Health Welfare or the Environment

A. Nature of Actual or Threatened Release of Hazardous Substances, Pollutants or Contaminants.

There has been a release of hazardous substances into the environment at the Site. Sample results from the asbestos inspection conducted by CDPHE confirm the presence of friable asbestos which is listed as a hazardous substance in 40 CFR §302.4 and Section 101(14) of CERCLA. Asbestos was found in components of the standing structures and in the rubble throughout the Site. The asbestos containing debris and remnants of the homes are located in the center of a residential trailer court (see Attachment 1, Map of West Acres Trailer Court) and pose a direct threat to public health and welfare.

B. Factors (from 40 CFR 300.415) which were considered in determining the appropriateness of a removal action:

Conditions at the Site present a threat to public health and the environment and meet the criteria for initiating a removal action under 40 CFR 300.415(b)(2) of the NCP. EPA has considered all the factors described in 40 CFR 300.415(b)(2) of the NCP and determined that the following factors apply at the Site.

“(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.”

The remains of the mobile homes are severely burned, almost entirely collapsed, and open to the environment. Sample results from the asbestos inspection conducted by CDPHE confirm the presence of friable asbestos not only from components of the standing structures, but in the rubble scattered throughout the properties. The asbestos containing debris and remnants of the homes are located in the center of a residential trailer court and pose a direct threat to public health and welfare.

“(v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.”

The mobile homes are severely burnt, partially collapsed, and are open to the environment due to missing portions of the building and other structural deficiencies. Weather events including wind, rain and snow will cause continued degradation of the remaining portions of the structures exacerbating the release or threatened release of asbestos fibers to the environment.

“(vii) The availability of other appropriate federal or state response mechanisms to respond to the release.”

No other local, state, or federal agency has the capability to independently implement a timely, effective response action to address the ongoing threat presented by the Site.

IV. Selected Removal Action and Estimated Costs

A. Situation and Removal Activities to Date

1. Current Situation.

The debris and remnants of the two mobile homes have been left in place in the West Acres Trailer Court. The properties are currently surrounded by 300 feet of fence and run-on and run-off controls have been installed along the fence. The Site is anticipated to be covered by snow throughout the winter and Site conditions will be monitored until the ACM can be properly disposed of in the Spring and Summer of 2025. Monitoring will entail routine check-ins with Routt County officials on the status of the fencing and controls around the Site.

2. Removal activities to date:

a) Federal Government/Private Party

EPA's Removal Program initiated an emergency response under the authority of the On-Scene Coordinator (OSC) on December 20, 2024. Run-on and run-off controls were installed along the perimeter of the Site on December 20, 2024, until the ACM can be removed and disposed of in the spring and summer of 2025.

b) State/local

The CDPHE Air Pollution Control Division conducted sampling on both mobile home properties on August 7, 2024, and on September 18, 2024. Sample results confirmed the presence of friable asbestos in the remnants of both mobile homes.

The Routt County Regional Building Department maintains a fence around the two properties which encloses the two mobile home buildings and debris around them.

The plane was removed from the Site after the fire was extinguished.

3. Enforcement

Where the responsible parties are known, an effort initially shall be made, to the extent practicable, to determine whether they can and will perform the necessary removal action promptly and properly.

B. Planned Removal Actions

1. Planned action description

The two properties are severely burned, structurally unsound, and in a state of disrepair. The EPA will conduct demolition and cleanup of the two mobile homes and the debris around them. The EPA may determine if any building components can be segregated from ACM during the demolition and cleanup process which can be managed as uncontaminated construction and demolition

debris for disposal purposes. Contaminated building debris at these properties will be managed as ACM for disposal purposes. Cleanup activities that will disturb ACM will be conducted using adequately wet methods to prevent the migration of asbestos fibers. ACM-contaminated debris and non-contaminated debris will be properly disposed of at permitted landfills. No post-removal Site controls are anticipated to be necessary following the removal action.

2. Contribution to remedial performance
The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the Site.
3. ARARs
Removal actions conducted under CERCLA are required to attain ARARs to the extent practicable. In determining whether compliance with ARARs is practicable, the OSC may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted. A table containing Site-specific ARARs is provided as Attachment 3 to this Action Memorandum.
4. Project Schedule
Site stabilization began on December 20, 2024, to implement run-on and run-off controls at the Site. The removal and disposal of ACM at the Site is anticipated to begin in spring of 2025 when the weather allows for effective dust suppression and asbestos wetting management practices. All removal activities are anticipated to conclude by the end of the summer.

C. Estimated Costs*

ERRS Contractor	\$235,000
START Contractor	\$80,000
Contingency costs (20% of subtotal)	\$63,000
Total Removal Project Ceiling	\$378,000

*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA. "

V. Expected Change in the Situation Should Action Be Delayed or Not Taken

A delay in action or no action at this Site would have increased the actual or potential threats to the public health and/or the environment.

VI. Outstanding Policy Issues

None.

VII. Approvals

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and is not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the Site.

Conditions at the Site met the NCP section 300.415(b) criteria for a removal action and through this document, I am approving the proposed removal actions. The total project ceiling is \$360,000, this amount will be funded from the regional removal allowance.

For

Aaron Urdiales,
Director
Superfund Emergency Management Division

Date

Attachments

Attachment 1: Maps

Attachment 2: Photos

Attachment 3: ARARs

Map 1: Map of West Acres Trailer Court



Attachment 2: Photos

Photo 1: View of 61 West Acres Dr. Mobile Home from the East



Photo 2: View of Damaged Properties from the East



Photo 3: View of 62 West Acres Dr. from the Driveway



**STATE APPLICABLE OR RELEVANT AND APPROPRIATE
REQUIREMENTS FOR
WEST ACRES ASBESTOS SITE**

PROPOSED REMOVAL ACTION

	<i>Standard, Requirement or Criteria</i>	<i>Description</i>	<i>Type</i>	<i>Potentially Applicable or Relevant and Appropriate or TBC</i>	<i>Comment</i>
Air					
	Colorado Fugitive Dust Control Plan/Opacity, Regulation No. 1, 5 CCR 1001-3(III)(D)(2)(b),(h) (Particulate Matter – Construction Activities), pursuant to Colorado Air Pollution Prevention and Control Act, CRS § 25-7-101 <i>et seq.</i>	Establishes regulations concerning fugitive emissions from construction activities, storage and stockpiling activities, haul trucks, and tailings ponds.	A	Applicable	Applicable to all activities generating dust.
	Colorado Control of Hazardous Air Pollutants, 5 CCR 1001-10 Regulation 8 Part B, §§ I(B), III(A), (B), (H) and (W), pursuant to Colorado Air Pollution Prevention and Control Act, CRS §§ 25-7-101 <i>et seq.</i>	Establishes regulations for abatement of asbestos-contaminated structures.	A	Applicable *Only the substantive requirements of § III.W.2.j. apply	Applicable to unstable building demolition.

Noise Control					
	Colorado Noise Abatement Statute, CRS § 25-12-103	Establishes maximum permissible noise levels for particular time periods and land use zones. For construction projects, maximum noise levels will be those specified for industrial zones for the time period within which construction is to be completed. For residential zones, the maximum permissible sound level from 7:00 am to the next 7:00 pm is 55 A-weighted decibels (db(A)) and from 7:00 pm to the next 7:00 am is 50 db(A).	A	Applicable	Applicable to all construction, transport and backfilling activities if removal activities are located within a land use zone subject to noise regulations.

TO BE CONSIDERED

	Colorado Wildfire Recovery Guidance for Cleanup of Damaged or Destroyed Buildings, available at: http://www.coemergencency.com/2012/07/wildfire-recovery-guidance-for-cleanup.html	Offers advice for handling ash and debris from burned structures.	A/L	TBC	General guidance on handling of debris and ash generated by structures that have wholly or partly burned.
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