United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Thursday, June 18, 2009
From: Deborah Lindsey

Subject: Restart of Removal Activities
WRG4 Vermiculite Site
1210 Factory Street, Ellwood City, PA
Latitude: 40.8595660
Longitude: -80.3000080

POLREP No.:	13	**Site #:**	E358
Reporting Period:	4/20/09 - 5/15/09	**D.O. #:**	0703-03-009
Start Date:	7/16/2008	**Response Authority:**	CERCLA
Mob Date:	4/17/2008	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	PAN000305592	**Contract #**	EP-S3-07-03
RCRIS ID #:			

Site Description
See previous POLREP for Site description information

Current Activities
On April 21, 2009, EPA arrived onsite to resume the removal action which had been temporarily suspended for the winter season.

For the week of April 20 through April 24

On April 21, 2009, the OSC initiated the remobilization of ERRS and START personnel to resume removal activities at the Site. A small ERRS crew mobilized and began site-setup operations including setting up office trailers, support facilities and utilities. ERRS also began limited clearing and grubbing of support areas and moved materials and equipment that were temporarily stored in a storage unit back to the Site. The full contingent of ERRS personnel was scheduled to arrive and begin site work the week of April 28, 2009.

EPA's Environmental Response Team (ERT) was on-site during the reporting week to provide technical assistance to START on the Air Sampling and Air Monitoring Plan that had been developed during the winter shutdown period. ERT and START discussed overall sampling strategies for the site including proposed air sampling locations, sample collection methodology, hands-on review of equipment, analytical requirements and data management. The field trailer was setup and to hold and charge all air monitoring and air sampling equipment.

On April 24, 2009, the OSC and START participated in a conference call with EPA Client Service Team (CST) regarding the status of the previously submitted Analytical Requests for soil samples to be analyzed by PLM per CARB 435 Method and for air samples to be analyzed by PCM (NISOH 7400 Method) and TEM (ISO 10312). CST indicated that the analytical procurement could take approximately 2 to 6 weeks with a worst case projection of having laboratory services by the first week of June 2009.

For the week of April 27 through May 1

During the reporting week, the full ERRS crew arrived onsite and began site preparations in order to implement the Cover System and Slope Stabilization Plan developed during the winter shutdown period. The Plan divided the Site into three distinct sections (Western, Central and Eastern Sections) with different cover system and slope stabilization plans for each section. Work was initiated in the Central Section which is the hillside on the former vermiculite property which leads from the parking lot of the facility down to the active railroad. ERRS began working by setting up work zones, installing silt fencing at the toe of the slope of the hillside and performing clearing and grubbing activities on the hillside. All tree debris and root balls were being stage on plastic within the hot zone while waiting for disposal roll-offs to

be delivered to the site. All work was being performed from the top of the hillside since an access agreement with the railroads has not been finalized.

START began implementing the Air Sampling and Monitoring Plan with sampling being conducted at the two perimeter stations and one station at the work zone. START troubleshooting numerous equipment problems during the week.

For the week of May 4 through May 8

ERRS continued to perform clearing and grubbing activities on the slope in the Central Area. Tree debris and root balls were being staged within the hot zone and a secondary staging area until disposal roll-offs arrived on-site. ERRS was removing surficial debris from the hillside with the bucket of the excavator as well hand raking the slope to remove vegetation and small debris. Since there was no longer a vegetative cover on the hillside, ERRS began covering the hillside with visqueen plastic to help minimize migration of asbestos fibers from the slope.

START conducted air monitoring/air sampling around the work area and at the perimeter of the Site. During the reporting week, START collected a total of 42 air samples. Analysis of samples was pending the award of an analytical laboratory. START also coordinated with ERT regarding the frequency of TEM analysis on method blank and field blank samples and the SCRIBE hotline for technical assistance in ensuring the air sample data is uploaded into a SCRIBE database.

On May 7, 2009, the OSC and START met with the Ellwood City Fire Chief MacDonald to discuss the possibility of collecting a reference sample on the roof of the fire station. Chief MacDonald agreed and START began to procure the sampling equipment and supplies for the off-site reference location.

For the week of May 11 through May 15

ERRS continued to remove surficial debris primarily consisting of concrete pieces from the slope in the Central Area. ERRS personnel on the slope used rakes to help pull vegetation and small debris down to the bottom of the slope where it was staged for later removal. Water was sprayed onto the hillside in the work area to minimize the potential for dust migrating offsite. ERRS also continued to pull root balls from the slope. The root balls were sprayed with water to remove the potential gross asbestos contamination and then placed within the work area at the top of the hill. Roll-offs and liners began to arrive on-site. ERRS began filling roll-offs with staged tree debris and root balls. ERRS to coordinate with the disposal facility as soon as roll-offs are full to minimize the amount of time roll-offs are on-site

Site operating procedures initially required that the hillsides be covered with plastic when all the vegetation had been cleared and prior to the final cover system. The plastic cover would help minimize migration of asbestos fibers from the slope. However, due to the plastic cover being blown off the hillside this past weekend and the potential ramifications to rail traffice, it was determined that the plastic cover will no longer be placed on the hillside. The close proximity of the railroad tracks to the hillside and the high potential for the plastic sheeting to be blown onto the tracks was a large factor in the decision. ERRS will increase the wetting of the hillside during all site operations and on weekends to minimize the potential for dust migration from the site.

On May 13, 2009, START's technical consultant arrived onsite to check on progress of the site. The consultant noted that the Cental Area slope needed some filling in and smoothing out, but thought the hillside was progressing nicely. Discussed the idea of installing an additional drainage ditch near the boundary of the Central and Western Area, as well as installing a small gabion wall at the eastern most section of the Central Area.

START conducted oversight of work activities and daily air monitoring/air sampling around the Central work area and at the perimeter of the Site. During the reporting week, START collected a total of 44 samples. Analysis of samples was pending the award of an analytical laboratory.

On-Going Actions During the Reporting Period

ERRS continued to wet down work areas, access road and support zones for dust suppression. ERRS also began wetting down the hillside on weekends.

The START air sampling and air monitoring program includes collecting air samples around the designated work area, perimeter stations and at an offsite reference location (Ellwood City Fire Station). The Air Sampling consists of high volume air sampling with an Aircon II sampling pump and co-located low flow air sampling as a backup sample. Air samples collected included low flow back-up samples, co-located

samples, personnel samples, media blank samples, and field blank samples Air monitoring is being conducted utilizing Dataram 4000 particulate monitoring units collocated at each of the air sampling stations except for the offsite reference location. A meteorological weather station is used to monitor on-site conditions and data used to generate daily wind roses.

Planned Removal Actions

Continue to prepare hillside for the installation of a cellular confinement system (CCS) which will provide slope stabilization and soil erosion control. The CCS system will also allow for the placement of 8 inches of clean soil over the asbestos-contaminated soils and then vegetate.

Begin work on the drainage swale at the toe of the slope in the Central Section. Swale is recommended to be 3 ft wide and 18 inches deep with a slight grade in the westerly direction to drain runoff towards the ravine.

Continue to conduct air monitoring and air sampling.

Key Issues

Continue to work with the Buffalo & Pttsburgh Railroad and CSX Transportation on an executed access agreement.

Continue to work with the Client Services Team in Ft. Meade in procuring analytical laboratory services for air samples.

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