U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Desler/Plywood Mill Asbestos Site - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #3**
Removal Activities Continue
Desler/Plywood Mill Asbestos Site
10HG
Sweet Home, OR
Latitude: 44.4030587 Longitude: -122.7176838

To:
From: Daniel Heister, On-Scene Coordinator
Date: 10/26/2009
Reporting Period: October 26 - October 31 2009

1. Introduction

1.1 Background

Site Number:	10HG	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	10/12/2009	**Start Date:**	10/12/2009
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category
Time-Critical Removal Action

1.1.2 Background
The Desler/Plywood mill asbestos site is located at 2210 Tamarack St, Sweet Home, Oregon. The plywood mill, which consisted of the current areas of interest, was in operation from 1959 to 1994, and included many if not all stages of the lumber refining process including wood treatment. Currently the property consists of approximately 153 acres upon which are located two log ponds and several small creeks that flow east to west across the site towards the South Santiam River, located approximately 2,500 feet west of the site. The site is surrounded to the north and northwest by residential homes, the closest of which are located approximately 50 feet north of the site, immediately across Tamarack Street. To the west and south of the site are several commercial and industrial facilities, and to the east are unimproved and agricultural lands. The site is located approximately 1,000 feet north of Main Street, the town's main thoroughfare.

Documents provided to the US EPA by the ODEQ indicate that demolition of the site's east and west dry kilns, the former site power house, and the sorter/stacker buildings occurred beginning early June 2007, and continued through late January 2008. The documents indicate the presence of friable asbestos containing material (ACM) throughout the demolition debris piles remaining on site. Sample results collected by several environmental consulting firms, a certified abatement contractor, and ODEQ indicate the presence of amosite and chrysotile asbestos in the site materials ranging between <1% and 45%. Several of the samples contained asbestos above the allowable limit of >1%, indicating that the materials are ACM as defined by 40 CFR Part 763.

The current rubble piles containing moderate to large quantities of ACM and cover approximately 30,000 square feet (ft2) in the former kiln area and 33,000 ft2 in the former sorter/stacker building area. The former kiln area is located along the south side of Tamarack St, just east of 18th Ave. Several residential homes are located approximately 50 feet north of the debris piles, across Tamarack St.

1.1.2.1 Site Location
The Desler/Plywood mill asbestos site is located at 2210 Tamarack St, Sweet Home, Oregon.

1.1.2.2 Description of Threat
The documented presence of friable asbestos containing material (ACM) throughout the demolition debris piles remaining on site represents a serious potential health threat to the neighboring community, specifically those residences located across Tamarack St. just north of the site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Sample results collected by several environmental consulting firms, a certified abatement contractor, and ODEQ indicate the presence of amosite and chrysotile asbestos in the site materials ranging between <1% and 45%. Several of the samples contained asbestos above the allowable limit of >1%, indicating that the materials are ACM as defined by 40 CFR Part 763.

Bulk ACM samples collected by the EPA START contractors and analyzed by phase light microscopy (PLM), gravimetric reduction and semi-quantitative point count analysis indicated asbestos in sampled materials ranging between <1% and 58%, confirming previous findings at the site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Not Applicable

2.1.2 Response Actions to Date

October 26, 2009-

OSC Heister, ERRS, START, and ATEZ are on site today to continue ACM removal activities. ERRS has filled four roll-offs with ACM removed from the west kiln area and to the degree possible have continued sorting and decontaminating large sections of concrete in an attempt to keep removal costs down while still removing the asbestos contamination. ATEZ abatement contractors continued abatement of the asbestos containing TSI in the elevated pipe corridor. ATEZ removed approximately 300 linear feet of TSI amounting to approximately 100 bags of ACM material. Sweet Home Sanitation transported six 30' roll-off containers and six 20' roll-off containers filled with ACM to the Coffin Butte landfill in Corvallis, Oregon for disposal. A total of 237,860 pounds of ACM was disposed of today bringing the total to date to 1,126,440 pounds.

START collected 8 PCM air samples, deployed 5 DataRam 4000 particulate monitors, and a Weather Hawk portable weather station to monitor and record data. In addition, START collected two waste water samples from the baker holding tanks on site to be analyzed for asbestos content. The baker holding tanks contain filtered runoff water that was captured on site by ERRS contractors to prevent potentially asbestos contaminated water from being released to the local sewer system or other storm drains. All samples collected will be sent off site to a nationally accredited laboratory for analysis. The results of said samples have not yet been received from the laboratory.

An ERRS' contracted industrial hygienist (IH) was on site today to collect PCM air samples for the negative pressure abatement of the elevated pipe corridor. The IH collected one personal exposure PCM sample on one abatement contractor working inside the containment, one ambient air PCM sample in the area near the negative pressure enclosure decontamination zone, and one ambient air PCM sample centrally located near the negative air machines under the corridor itself. These samples were analyzed on site by the IH. Results of the PCM samples were reported as being well below the site action level.

October 27, 2009-

OSC Heister, ERRS, START, and ATEZ are on site today to continue ACM removal activities. ERRS has filled eight roll-offs with ACM removed from the west kiln area and to the degree possible have continued sorting and decontaminating large sections of concrete in an attempt to keep removal costs down while still removing the asbestos contamination. During sorting activities, a small section (~15' x 25') of the former cooling shed roof collapsed and fell to the ground. No one was working in the immediate area of the collapse therefore no injuries were sustained. The collapsed section of roof contains several layers of roofing material that may contain asbestos and thus will require abatement prior to disposal. ATEZ abatement contractors completed post-abatement cleaning of the elevated pipe corridor and filled one roll-off container with the ACM they had removed. Sweet Home Sanitation transported five 30' roll-off containers and seven 20' roll-off containers filled with ACM to the Coffin Butte landfill in Corvallis, Oregon for disposal. A total of 243,920 pounds of ACM was disposed of today bringing the total to date to 1,370,360 pounds.

START collected 8 PCM air samples, deployed 5 DataRam 4000 particulate monitors, and a Weather Hawk portable weather station to monitor and record data. In addition, START collected two PCM air samples to be used as clearance samples for the elevated pipe corridor. All samples collected will be sent off site to a nationally accredited laboratory for analysis. The results of said samples have not yet been received from the laboratory.

October 28, 2009-

OSC Heister, ERRS, START, and ATEZ are on site today to continue ACM removal activities. ERRS has filled 7 roll-offs with ACM removed from the west kiln area and to the degree possible have continued sorting and decontaminating large sections of concrete in an attempt to keep removal costs down while still removing the asbestos contamination. Sweet Home Sanitation transported four 30' roll-off containers and six 20' roll-off containers filled with ACM to the Coffin Butte landfill in Corvallis, Oregon for disposal. A total of 208,940 pounds of ACM was disposed of today bringing the total to date to 1,579,300 pounds.

START collected 8 PCM samples, 4 TEM samples, and deployed 5 DataRam 4000 particulate monitors and a Weather Hawk portable weather station to monitor and record data. All samples collected will be sent off site to a nationally accredited laboratory for analysis. The results of said samples have not yet been received from the laboratory.

A representative of the Oregon State Department of Environmental Quality (ODEQ) was on site today and was given a tour of the site and briefed on the removal action progress thus far. In addition, The ODEQ representative performed a brief audit of the ATEZ abatement contractor's certifications and found ATEZ to be in full compliance.

The property owner's liaison was on site today and was provided a site tour and given an update regarding the progress of the removal action thus far by OSC Heister.

October 29, 2009-

OSC Heister, ERRS, START, and ATEZ are on site today to continue ACM removal activities. ERRS has filled 8 roll-offs with ACM removed from the west and east kiln areas and to the degree possible have continued sorting and decontaminating large sections of concrete in an attempt to keep removal costs down while still removing the asbestos

contamination. The majority of the bulk ACM has now been removed from both kiln areas, as well as the Sorter/Stacker area. ERRS will shift it's focus to filling ACM burritos with the stockpiled ACM that has accumulated over the past few days, removing the residual ACM from the abated areas, and the stabilization of the remaining structures. Sweet Home Sanitation transported five 30' roll-off containers and seven 20' roll-off containers filled with ACM to the Coffin Butte landfill in Corvallis, Oregon for disposal. A total of 290,840 pounds of ACM was disposed of today bringing the total to date to 1,870,140 pounds.

START collected 8 PCM samples and deployed 5 DataRam 4000 particulate monitors and a Weather Hawk portable weather station to monitor and record data. All samples collected will be sent off site to a nationally accredited laboratory for analysis. The results of said samples have not yet been received from the laboratory.

October 30, 2009-
OSC Heister, ERRS, START, and ATEZ are on site today to continue ACM removal activities. ERRS has filled 11 roll-offs with ACM removed from the west and east kiln areas and to the degree possible have continued sorting and decontaminating large sections of concrete in an attempt to keep removal costs down while still removing the asbestos contamination. Since the majority of the bulk ACM has now been removed from both kiln areas, as well as the Sorter/Stacker area, ERRS has shifted it's focus to filling ACM burritos with the stockpiled ACM that has accumulated over the past few days, removing the residual ACM from the abated areas, and the stabilization of the remaining structures. In addition, ERRS has begun clearing out the area in which the section of the former Cooling shed roof collapsed. As has been the case throughout the removal action to date, ERRS is attempting to separate non-ACM debris from ACM debris in an attempt to limit disposal costs and volume of ACM debris. Sweet Home Sanitation transported six 30' roll-off containers and six 20' roll-off containers filled with ACM to the Coffin Butte landfill in Corvallis, Oregon for disposal. A total of 284,440 pounds of ACM was disposed of today bringing the total to date to 2,154,580 pounds.

START collected 8 PCM samples and deployed 5 DataRam 4000 particulate monitors and a Weather Hawk portable weather station to monitor and record data. All samples collected will be sent off site to a nationally accredited laboratory for analysis. The results of said samples have not yet been received from the laboratory.

October 31, 2009-
OSC Heister, ERRS, START, and ATEZ are on site today to continue ACM removal activities. ERRS has filled 20 roll-offs with ACM removed from the west and east kiln areas and to the degree possible have continued sorting and decontaminating large sections of concrete in an attempt to keep removal costs down while still removing the asbestos contamination. Since the majority of the bulk ACM has now been removed from both kiln areas, as well as the Sorter/Stacker area, ERRS has shifted it's focus to filling ACM burritos with the stockpiled ACM that has accumulated over the past few days, removing the residual ACM from the abated areas, and the stabilization of the remaining structures.

ERRS has begun demolition of several areas of the remaining structure that the EPA and its contractors have determined to be inherently unstable in an attempt to stabilize the structures. ERRS has demolished the western most section of the former cooling shed and elevated pipe corridor as well as a section of the west kiln's southern wall. Wet suppression techniques were utilized during demolition and little if any dust was observed. As has been the case throughout the removal action to date, ERRS is attempting to separate non-ACM debris from ACM debris in an attempt to limit disposal costs and volume of ACM debris. The rubble from the demolished sections of the structures will be sorted and the ACM debris will be disposed of at the Coffin Butte landfill. The non-ACM debris will be stockpiled for future disposal by the property owner.

START collected 8 PCM samples and deployed 5 DataRam 4000 particulate monitors and a Weather Hawk portable weather station to monitor and record data. All samples collected will be sent off site to a nationally accredited laboratory for analysis. The results of said samples have not yet been received from the laboratory.

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

2.1.4 Progress Metrics

Date	*Medium*	*# of Roll-offs filled with ACM*	*# of Roll-offs transported*	*Total Roll-offs transported to date*	*Weight*	*Total Weight to date*	*Disposal Location*
10/26/2009	**ACM retrieved from the west Kiln Area**	**4**	**12**	**62**	**237,860 lbs**	**1,126,440 lbs**	**Coffin Butte landfill in Corvallis, Oregon.**
10/27/2009	**ACM retrieved from the west Kiln Area**	**9**	**12**	**74**	**243,920 lbs**	**1,370,360 lbs**	**Coffin Butte landfill in Corvallis, Oregon.**
10/28/2009	**ACM**						**Coffin**

	retrieved from the west Kiln Area	7	10	84	208,940 lbs	1,579,300 lbs	Butte landfill in Corvallis, Oregon.
10/29/2009	ACM retrieved from the west Kiln Area	8	12	94	290,840 lbs	1,870,140 lbs	Coffin Butte landfill in Corvallis, Oregon.
10/30/2009	ACM retrieved from the east and west Kiln Area	11	12	106	284,440 lbs	2,154,580 lbs	Coffin Butte landfill in Corvallis, Oregon.
10/31/2009	ACM retrieved from the west Kiln Area	TBD	0	0	NA	2,154,580 lbs	NA

2.2 Planning Section

2.2.1 Anticipated Activities
Anticipated activities include the removal and proper disposal of Asbestos Contaminated Materials (ACM) resulting from the improper demolition of several structures within the confines of the site including two Dry Kiln buildings, a Sorter/Stacker building, and the former site power house building. In addition, asbestos thermal systems pipe insulation (TSI) will be abated from within an elevated pipe corridor located just south of the former kiln areas.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps
ERRS will continue sorting through the rubble piles of large sections of demolished concrete in an attempt to separate ACM from salvageable non-contaminated materials. ERRS contractors will continue to remove ACM debris in the west Kiln area and progressing towards the east Kiln. ACM debris will be burrito wrapped and transported to an approved landfill for disposal. START contractors will continue to collect air samples on a daily basis and have them analyzed for asbestos content.

2.2.2 Issues
Potential issues include airborne particulates (dust) created be heavy equipment during removal of ACM debris, and asbestos contaminated water produced by rain run-off and wet supression techniques utilized during abatement.

2.3 Logistics Section
Not Applicable

2.4 Finance Section
No information available at this time.

2.5 Other Command Staff
2.5.1 Safety Officer
Not Applicable

2.6 Liaison Officer
Property owner Liaison:
Mr. Jeff Johnson
Advanced Environmental Solutions, LLC
Office: (541) 818-0271
Cell: (541) 912-0528

2.7 Information Officer

2.7.1 Public Information Officer
The EPA Community Involvement Coordinator for the Desler/Plywood Mill Asbestos Site is:
Mark MacIntyre

2.7.2 Community Involvement Coordinator
The EPA Community Involvement Coordinator for the Desler/Plywood Mill Asbestos Site is:
Judy Smith

3. Participating Entities

3.1 Unified Command

Not Applicable

3.2 Cooperating Agencies

Oregon Department of Environmental Quality (ODEQ)

4. Personnel On Site

EPA On-Scene Coordinator: 1
Emergency and Rapid Response Services (ERRS) personnel: Approximately 7
Superfund Technical Assessment Response Team (START) personnel: Approximately 3
ATEZ abatement contractor personnel: Approximately 7

5. Definition of Terms

ACM- Asbestos Containing Material
ERRS- Emergency and Rapid Response Services
OSC- On-Scene Coordinator
START- Superfund Technical Assessment Response Team

6. Additional sources of information

6.1 Internet location of additional information/report

Not Applicable

6.2 Reporting Schedule

Not Applicable

7. Situational Reference Materials

Not Applicable