

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Zonolite W.R. Grace Easthampton - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #1
Initial
Zonolite W.R. Grace Easthampton
01FK
Easthampton, MA
Latitude: 42.2500000 Longitude: -72.6900000

To:
From: John Mckeown, On-scene coordinator
Date: 11/26/2010
Reporting Period: September 27 through November 12 2010

1. Introduction

1.1 Background

Site Number:	01FK	Contract Number:	
D.O. Number:		Action Memo Date:	3/22/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/27/2010	Start Date:	9/27/2010
Demob Date:		Completion Date:	
CERCLIS ID:	MAD019335561	RCRIS ID:	
ERNS No.:		State Notification:	Yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

PRP Lead Time-Critical Removal Action

1.1.2 Site Description

From 1963 to 1992, Zonolite/W.R. Grace leased the property from Oldon Limited Partnership LLC to operate an exfoliation plant. Zonolite/W.R. Grace received asbestos-containing vermiculite concentrate (by rail) from the Zonolite mine in Libby, Montana, and produced Zonolite attic insulation and Monokote fireproofing material. In 1992, Zonolite/W.R. Grace removed all equipment from the building, washed down the building and conducted confirmation air sampling. The building was vacant or used as a warehouse from 1992 to present.

The Site consists of several properties with asbestos-containing soils, including the Former Zonolite Facility, and adjacent properties. Private parties own all site-related properties with the exception of the railroad right-of-way, which the City of Easthampton acquired through eminent domain.

1.1.2.1 Location

The Former Zonolite/W.R. Grace Facility is located at 19 Wemelco Way in a mixed residential/commercial/agricultural area of Easthampton, Hampshire County, Massachusetts.

1.1.2.2 Description of Threat

The hazardous substance is amphibole asbestos, primarily asbestos-containing vermiculite originating from the Zonolite Mine in Libby, Montana (see definition of terms).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In 2009, EPA conducted a Preliminary Assessment consisting of a thorough review of analytical data generated by EPA, Mass DEP and W.R. Grace (Woodward and Curren) during 2000 and 2001 sampling investigations. Results of the Preliminary Assessment confirmed the presence of asbestos fibers in soils and subsurface soils at levels ranging from trace to over 5%.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

W.R. Grace hired O'Reilly Talbot and Okun (OTO) to develop a Site-Specific Work Plan (SSWP) and manage the time-critical removal action. OTO hired BGL as the contractor to execute the SSWP. OTO and BGL mobilized to the Site on September 27, 2010. The first few weeks of work consisted primarily of Site preparation. To date, OTO and BGL have completed excavation of all areas located off the actual Former Zonolite facility property. This includes contaminated soils located on the Cernak Parcel, JPS Elastomerics Parcel, DOS Parcel and the railroad right-of-way. OTO and BGL have met all requirements to protect the wetlands surrounding the Site and have completed backfilling and seeding the excavated wetland areas.

EPA (START) and Mass DEP coordinated with Grace (Remediation Group) to conduct oversight of on-site activities.

2.1.2 Response Actions to Date

- Mobilized personnel and equipment to the Site;
- Established work zones, site trailer, decon area and constructed roads required to complete site work;
- Completed all required in coordination with local conservation commission to protect the surrounding wetlands;
- Continued to define the lateral and vertical extent of the Site;
- Identified, sampled and approved gravel, top soil, sand and wetland fill materials;
- Take all required measures to prepare site for excavation to include clearing of vegetation, stump grinding and removal and disposal of railroad ties;
- Prepared placement area located on the Former Zonolite Facility property and began moving contaminated soil into the placement area;
- Excavated contaminated soil from the Cernak Parcel, DOS Parcel, Elastomerics Parcel and backfilled with appropriate material;
- Completed excavation of railroad right-of-way, backfill pending.

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

W.R. Grace entered into an Administrative Order on Consent (AOC) with EPA to complete this time-critical removal action.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Disposal</i>
Asbestos	fibers in soil	2,000 cu yd	Place on-site in placement area

2.2 Planning Section

2.2.1 Anticipated Activities

During the next phase, OTO and BGL will continue to excavate asbestos containing soil and move to the placement area. OTO and BGL coordinated with Tennessee Gas Pipeline and their technical contractor (PL ENSERV) to begin removing contaminated soil from around the pipeline on 15 November 2010. Other activities include beginning to cover completed portions of the placement area and backfilling the railroad right-of-way.

2.2.2 Issues

No significant issues at this time.

2.3 Logistics Section

No logistics problems anticipated at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Site Safety enforced by BGL project manager and OTO Safety Officer.
Site HASP reviewed by all workers on-site.
Perimeter air monitoring is conducted at the site.

PPE level C with asbestos monitoring for workers unless site conditions indicate downgrade.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

EPA - Emily Zimmerman 617-918-1037

2.7.2 Community Involvement Coordinator

EPA Site Specific Fact Sheet and Website created for this Site.

www.epa.gov/region1/

EPA - Emily Zimmerman 617-918-1037

3. Participating Entities

3.1 Unified Command

Unified command consist of:

EPA Region 1
Massachusetts Department of Environmental Protection (MassDEP)
City of Easthampton, Massachusetts
W.R. Grace

3.2 Cooperating Agencies

Massachusetts Department of Transportation (MassDOT)
Massachusetts Department of Public Health (MassDPH)
Agency for Toxic Substances and Disease Registry (ATSDR)

4. Personnel On Site

EPA OSC
Mass DEP
W.R. Grace (Remedium)
OTO - Project Manager and other technical personnel
BGL - Project Manager and asbestos abatement personnel

5. Definition of Terms

Amphibole Asbestos - Amphibole minerals regulated as asbestos by the U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) includes five classes: fibrous tremolite, actinolite, anthophyllite, crocidolite, and amosite. Asbestos poses health risks when people breathe fibers present in the air. When inhaled in significant quantities, asbestos fibers can cause asbestosis (a scarring of the lungs, which makes breathing difficult), mesothelioma (a rare cancer of the lining of the chest or abdominal cavity) and lung cancer.

6. Additional sources of information

6.1 Internet location of additional information/report

6.2 Reporting Schedule

OTO on behalf of W.R. Grace prepares and submits a summary report every two weeks per AOC.

7. Situational Reference Materials

No information available at this time.