

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region I

**Subject:** POLREP #2  
Progress  
Zonolite W.R. Grace Easthampton  
01FK  
Easthampton, MA  
Latitude: 42.2500000 Longitude: -72.6900000

**To:**  
**From:** John Mckeown, On-scene coordinator  
**Date:** 2/1/2011  
**Reporting Period:** November 13, 2010 through January 28, 2011

1. Introduction

1.1 Background

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

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. To date, OTO and BGL have completed all requirements as described in the SSWP with the exception of reseeded the final cover of the placement area. This action cannot be completed until Spring of 2011 due to cold temperatures. In the Spring of 2011, OTO and BGL will also address any areas of the cap damaged by weather conditions during the winter months. See paragraph 2.1.2 below for a detailed list of Response Actions completed by OTO and BGL during this removal action.

#### 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 coordination with local conservation commission to protect the surrounding wetlands;
- Defined the lateral and vertical extent of the Site;
- Identified, sampled and approved gravel, top soil, sand and wetland fill materials;
- Took all required actions to prepare site for excavation including clearing of vegetation, stump grinding and removal and disposal of railroad ties;
- Excavated contaminated soil from the Cernak Parcel, DOS Parcel, Elastomerics Parcel and backfilled with appropriate material;
- Completed excavation of railroad right-of-way and backfilled with sand per agreement with MassDOT;
- Coordinated with Tennessee Gas Pipeline (TGP) to excavate contaminated surface and subsurface soil along the pipeline easement. P.L. Enerserv, LLC (TGP contractor) conducted all excavation actions around the high pressure pipeline;
- Prepared placement area located on the Former Zonolite Facility property and moved all asbestos contaminated soil into the placement area;
- Covered the placement area with fabric and minimum of two feet of clean fill;
- Graded placement area for proper drainage and hydroseeded;
- Maintained erosion control system during entire operation;
- Continue asbestos abatement activities inside of the building.

#### 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

<b><i>Waste Stream</i></b>	<b><i>Medium</i></b>	<b><i>Quantity</i></b>	<b><i>Disposal</i></b>
<b>Asbestos</b>	<b>fibers in soil</b>	<b>2,000 cu yd</b>	<b>Place on-site in placement area</b>
<b>Asbestos</b>	<b>PPE</b>	<b>10 cu yd</b>	<b>BFI Landfill in Imperial, PA</b>

### 2.2 Planning Section

#### 2.2.1 Anticipated Activities

With the exception of finishing the asbestos abatement inside of the building and repairing any weather related damage identified during the final inspection, this project is complete.

The asbestos abatement should be completed by mid-February 2011.

The final inspection will likely be conducted in late April or during May 2011. W.R. Grace, EPA and MassDEP will identify any areas needing repair or further work during that time.

The PRPs will develop an Activity and Use Limitation (AUL) for the surface impoundment.

Grace will provide a detailed Final Report upon completion of this project.

#### 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.

On December 13, 2010, four asbestos abatement workers from Abide INC. (Abide) were exposed to Carbon Monoxide (CO) while working inside of the building. The workers were treated on-site by EMTs and were taken to hospital for precautionary reasons and tests. All workers were released from the hospital within 24 hours. OSHA met with representatives from Abide to determine cause of incident. Source of CO believed to be an exhaust from a generator located just outside the building but upwind. At time of exposure, the Abide workers were operating in a small office room which helped to capture the exhaust from the generator.

### **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/](http://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

P.L Enerserv - Contractor for Tennessee Gas Pipeline

Tennessee Gas Pipeline - Owner of pipeline located in easement bisecting the property

Abide INC. - Asbestos abatement contractor working inside the former exfoliation plant building.

## **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.