UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VIII

Subject: **POLREP #9**
Progress
Minot ND Floods-2011
Minot, ND
Latitude: 48.2329061 Longitude: -101.3042450

To:

From: Steven Way, OSC
Kerry Guy, OSC

Date: 8/30/2011

Reporting Period:

1. Introduction

1.1 Background

Site Number:		**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	Stafford Act	**Response Type:**	Emergency
Response Lead:	FEMA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	7/11/2011	**Start Date:**	7/11/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Stafford Act/CERCLA

1.1.2 Site Description

In late June 2011 the Souris River overtopped its banks causing extensive flooding in Ward and McHenry counties in North Dakota. In Minot, ND, over 4,000 homes and businesses were inundated with flood waters, with over 2,000 structures completely submerged. The nearby towns of Burlington, Sawyer and Velva were also impacted. FEMA issued a Mission Assignment to EPA to accomplish four objectives: remove household hazardous wastes from the impacted area; decontaminate and prepare white goods and e-waste for recycling; collect and process orphaned containers; and to conduct environmental monitoring and sampling in impacted and work areas. Initial recon began July 11, 2011.

1.1.2.1 Location

Minot, North Dakota
Burlington, North Dakota
Sawyer, North Dakota
Velva, North Dakota
Ward County, North Dakota
McHenry County, North Dakota (TBD as needed)

1.1.2.2 Description of Threat

Due to extensive flood damage, FEMA tasked EPA to collect and manage household hazardous wastes (HHW), white goods, e-goods, orphaned haz-mat containers and asbestos on curbsides. In addition EPA will be providing air monitoring/sampling support throughout the operational theater. During the week of July 25th, it was determined that vermiculite insulation (aka "Zonolite" or "Zonolite Attic Insulation" or "ZAI") is present in some of the older homes and neighborhoods. Consequently, this asbestos bearing material has been appearing in the curbside debris piles as home owners return and gut their houses.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Returning property owners continue to bring out HHW and e-wastes for collection. Orphaned containers continue to be present in all areas but in decreasing numbers (see Operations Section). Asbestos bearing materials are present in abundance throughout the Minot area.

Recon Teams continue to use the established grid system of Ward and McHenry counties to systematically track and manage the presence of hazardous materials. Summaries of these assessments can be found on the EPA Field Assessment Viewer (http://react.nvs-inc.com/epasilver/).

Reconnaissance of orphan containers along waterways and oxbows has identified significant numbers of small containers, drums and small tanks during this period. Preliminary screening information is available on the website referenced below. Asbestos (vermiculite) piles are being inspected by the Recon Team to verify locations and quantity; this is being done in coordination with USACE inspectors managing debris removal.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The Operation Section is organized into three branches:

I. Processing Pad Branch (OSC Way)
- Container Group (Waste Sorting/Bulking)
- White Goods Team (Cleaning/Freon Removal/Mercury Removal)
- START Team (Monitoring/Hazard Categorization/Counting and Reporting)

II. Container Collection Branch (OSC Way and OSC Nattis)
- Curbside HHW Collection Group
- Orphaned Container Collection (Land) Group (open access collection)
- Orphaned Container Collection (Remote) Group (river and difficult access collection)
- Recon Team

III. Asbestos Collection Branch (OSC Guy)
- Bag Collection Group (collected bagged asbestos material)
- Excavation Group (excavate debris piles)
- Vac Group (vacuum loose piles of ZAI)
- Recon Team

2.1.2 Response Actions to Date

Process Pad Branch: The Pad crews continue to sort and bulk the incoming streams of HHW and orphaned containers. As of 8/27/11, over 85,500 containers have been collected and processed at the Collection Pad. This includes: small containers, drums, tanks, propane tanks, cylinders, batteries, fire extinguishers, fluorescent bulbs, ammunition, small engines and other.

White goods continue to be received from the USACE collection operation, and to date 4,892 have been received of which 1,775 are refrigeration/freezer units. EPA ERRS crews process the units: Freon and oils are removed or recycled, and spoiled food is removed and disposed of in landfill. The White Goods Team has cleaned over 1,500 refrigerators and processed over 2,500 inert white goods to date. Freon and/or mercury switches have been removed from over 875 refrigerators. The 875 + processed refrigerators, along with all the inert white goods, have been turned over to the city of Minot for scrap-metal recycling. The e-waste recovery total volume is over 533 cy, and more than 250 cy has been shipped off-site for recycling.

Bulked loads of flammables, paints, oil, oxidizers, pesticides, caustics, acids, and batteries are being prepared for off-site shipment to disposal. The first loads of flammables and latex paints (recycling) are scheduled for shipping for disposal/recycle on August 30. The scheduled shipment off-site on Tuesday, August 23, 2011 was delayed by the Disposal Subcontractor due to failure to process the Waste Profile as required. Every effort is being made to find reuse and recycling options for the waste streams generated from EPA's operations in Minot.

Hazardous classification by the START chemists on the majority of 1,200+ containers (1-85 gallons in size) of unknown materials was completed 8/24. The Region 8 "Level A Truck," which houses a mobile GC/MS unit and a fume hood, has been brought in to assist the identification effort.

Asbestos Collection Branch: As of August 26, EPA has removed ZAI containing material from 146 properties, and of these, 22 properties have required return trips to remove second and third deposits of ZAI material. A total of 174 ZAI collection events occurred at the 146 properties. This has resulted in the removal and disposal of approximately 1,200 cubic yards of asbestos contaminated debris. The asbestos Recon Team continues to find ZAI materials heavily distributed throughout the debris piles from older homes and neighborhoods in Minot. This concentrated distribution forms something akin to an abaculus in adjoining portions of Evacuation Zones 3, 4, 5 and 6 all debris zones.pdf .

The EPA continues a somewhat quixotic attempt to normalize asbestos collection operations. EPA is still in close coordination with USACE and OSHA in identifying and handling ZAI laden debris. The asbestos collection teams are roughly following the protocols described in the ZAI Collection Work Plan (ZAI Collection Work Plan.docx). However, as discussed in the ZAI Collection Status Report -08/18/2011 (ZAI Collection Status Report_08182011.docx) the pace and location of asbestos collection is largely controlled by the pace of the efforts of returning property owners in gutting their homes.

Rapid survey and recon assessments give a very rough estimate of 500-700 homes which may contain ZAI. Of these, 30-60% have had either no or only partial removal of their interiors. It has not been uncommon for collection teams to remove a ZAI pile only to find the same property recontaminated by wastes produced by a second interior demolition.

USACE has addressed a larger number of properties with lesser amounts of ZAI materials. These properties may need follow up assessments to determine if further asbestos removal is needed. Also, because of the issue of recontamination mentioned above, it will be prudent to periodically reassess the properties where work has already occurred. These reassessment procedures are discussed in the ZAI Collection Work Plan.

Container Collection Branch: HHW and orphaned containers (OCs) collection efforts continue throughout the area of operation. Collection of OCs was reported complete by ERRS in the area west of the Hwy 83 By-Pass through Burlington by August 26. Reconnaissance teams (START and SERAS contractors) during the week of August 22nd focused on investigating areas previously inaccessible due to standing water, temporary levy placements, etc. A substantial number (40 to 50) of 55 gal drums with oil/flammable liquids were recovered. With assistance of members of the USCG Strike Team, a concerted effort is now being made to remove all large tanks and containers (1,000+ gallons) from the Souris riverine corridor. If possible, orphan tanks and/or containers are returned to their original owner. A summary of the collection efforts to date, as well as a graphical representation of collection trends can be found at the following link: Total Count as of 082911.pdf

A link to a website http://react.nvs-inc.com/EPASilver/ contains a visual summary of all recon, collection, and other information through the area of operation.

The asbestos containing material disposal arrangements are being finalized. The ND Dept of Heath has been contacted regarding the appropriate facilities in ND to receive asbestos and that are in compliance. Given the current situation in Minot and the need to ensure rapid removal and disposal of asbestos debris waste, it was determined by the OSC to not require an asbestos disposal facility to be on the approved CERCLA Off-Site disposal list. According to the NDDOH, Minot and Sawyer both have State approved asbestos disposal facilities. Currently, the asbestos waste collected by EPA will be shipped to the Clean Harbors facility in Sawyer. The CERCLA off-site rule (found @ 40 CFR 300.440) allows the OSC to waive the requirements of the rule in certain circumstances. The conditions present in Minot satisfy the basis to apply this waiver in order to facilitate the quick disposal needed to safely complete the task of removing vermiculite insulation from the streets, sidewalks, and yards of Minot under the ESF 10 Mission Assignment. This waiver is provided for in the NCP at 40 CFR 300.440(a)(2): (2) In cases of emergency removal actions under CERCLA, emergency actions taken during remedial actions, or response actions under section 311 of the Clean Water Act where the release poses an immediate and significant threat to human health and the environment, the On-Scene Coordinator (OSC) may determine that it is necessary to transfer CERCLA waste offsite without following the requirements of this section.

*based on a visual estimate, a more accurate figure will be tracked as the material is packaged for off-site shipment

2.2 Planning Section

2.2.1 Anticipated Activities

EPA and contractor crew sizes are anticipated to remain at the current level for another 2 weeks to allow for work into more remote areas and perform large tank recovery. The Minot area HHW and other material collection will continue as needed.

Plans for completing the ESF 10 mission by September 30, 2011, are recommended as an objective for planning resource needs. The container collection is likely to be completed by that date. However, ZAI removal needs are somewhat unpredictable as stated below.

2.2.1.1 Planned Response Activities

Waste collection activities, including ZAI removal, will continue through the duration of the project. Generally, EPA will coordinate collection activities with USACE, working in parallel with them in each work zone. Recon and air monitoring will continue as well.

2.2.1.2 Next Steps

We shall continue on in good style.

2.2.2 Issues

ZAI dumping onto the "curbside areas" is likely to continue beyond the primary mission function due to the unpredictable nature of home owner renovation activities.

2.3 Logistics Section

NA

2.4 Finance Section

2.4.1 Narrative

Estimated Costs*

*The expenditures below are an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$3,000,000.00	$1,970,000.00	$1,030,000.00	34.33%
IAGs (USCG)	$20,000.00	$7,000.00	$13,000.00	65.00%
TAT/START	$300,000.00	$204,526.00	$95,474.00	31.82%
SERAS	$180,000.00	$125,000.00	$55,000.00	30.56%
Intramural Costs				
USEPA - Direct	$500,000.00	$230,000.00	$270,000.00	54.00%
USEPA - InDirect	$70,000.00	$0.00	$70,000.00	100.00%
Total Site Costs	$4,070,000.00	$2,536,526.00	$1,533,474.00	37.68%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

NA

2.6 Liaison Officer
NA

2.7 Information Officer

2.7.1 Public Information Officer

NA

7.2 Community Involvement Coordinator

NA

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

NA

4. Personnel On Site

Staffing levels for the current reporting period:

EPA	3
USCG	2 (1 demobed 8/25)
R8 START	3
ERRS	49
SERAS	2
R4 START	1

5. Definition of Terms

NA

6. Additional sources of information

6.1 Internet location of additional information/report

NA

6.2 Reporting Schedule

NA

7. Situational Reference Materials

NA