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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #3**
Final
Zonolite W.R. Grace Easthampton
01FK
Easthampton, MA
Latitude: 42.2500000 Longitude: -72.6900000

To:
From: John Mckeown, On-scene coordinator
Date: 11/4/2011
Reporting Period:

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:	4/29/2011	**Completion Date:**	10/28/2011
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 asbetos 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. By December 2010, OTO and BGL completed all requirements as described in the SSWP with the exception of reseeding the final cover of the placement area. In April 2011, OTO and BGL repaired any areas of the cap damaged by weather conditions during the winter months and reseeded the final cover of the placement area.

OTO submitted a draft copy of the Final Report and Activity Use Limitation (AUL) to EPA and Mass DEP for review. EPA and Mass DEP reviewed the Final Report and AUL and provided comment. OTO, acting on behalf of W.R. Grace, addressed comments and modified AUL and submitted completed report to EPA on September 21, 2011. EPA sent AOC Completion Letter to respondents on October 28, 2011.

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 commision 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;
- Completed asbestos abatement activitites inside of the building.
- Repaired damage to placement area cap due to erosion during the winter months.
- Successfully reseeded the placement area cap in April 2011.
- Demobilized from the Site.
- Submitted draft Final Report.
- Submitted Final report on September 21, 2011 addressing EPA comments.
- EPA AOC Completion Letter signed on October 28, 2011

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

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

2.2 Planning Section

2.2.1 Anticipated Activities

This project is complete.

2.2.2 Issues

No significant issues at this time.

2.3 Logistics Section

None

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
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

No further reports for this Site.

7. Situational Reference Materials

No information available at this time.