U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Guard Shack Abatement and Demo North Ridge Estates Asbestos Site - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #1**
North Ridge Estates Guard Shack Abatement and Demolition
Guard Shack Abatement and Demo North Ridge Estates Asbestos Site
10AY
Klamath Falls, OR
Latitude: 42.2593840 Longitude: -121.7382040

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From: Daniel Heister, On-Scene Coordinator
Date: 9/12/2012
Reporting Period: 09/04/2012-09/10/2012

1. Introduction

1.1 Background

Site Number:	10AY	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	8/31/2012
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	NPL	**Operable Unit:**	
Mobilization Date:	9/4/2012	**Start Date:**	9/4/2012
Demob Date:	9/10/2012	**Completion Date:**	
CERCLIS ID:	ORN001002476	**RCRIS ID:**	
ERNS No.:		**State Notification:**	Yes
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category
Time Critical Removal

1.1.2 Site Description

Access to the former guard shack and the ammunition bunkers is unrestricted. The Guard Shack, which measures approximately 72 feet by 24 feet, is structurally unsound and in an advance state of deterioration. Two concrete ammunition bunkers are situated adjacent to the building one on the north side and one on the south side. Both measure 8' by 8' by 10'h and while structurally intact the roofs are in disrepair and shedding asbestos roofing material. The guard shack and the concrete ammunition bunkers are located at the northwest corner of the firing range near the entry gate along Cougar Butte Road. At both the guard shack and the bunkers, there is evidence of trespass and vandalism such as empty beer containers, broken windows and graffiti.

1.1.2.1 Location
The North Ridge Estates (NRE) site is located approximately 3 miles north of the City of Klamath Falls in

Klamath County, Oregon, on Old Fort Road and North Ridge Drive. NRE is sited on the former location of the MRB and the Oregon Institute of Technology. The latitude is 42.261577 and the longitude is -121.738178. Vegetation in the area is sparse, with some scattered ponderosa pines and sagebrush. Soil is volcanic and rocky in places. The climate is relatively dry with an average rainfall of 13.2 inches.

The NRE has been divided into two Operable Units (OUs). OU1 encompasses the footprint of the former MRB and includes all areas where ACM (asbestos containing material) and/or asbestos has been observed and/or detected, including the on-Site landfills. OU2 encompasses the former Kingsley Firing Range Annex, which includes the guard shack and the concrete ammunition bunkers.

1.1.2.2 Description of Threat

The current conditions at this Site meet the following factors which indicate that the Site is a threat to the public health or welfare or the environment and a removal action is appropriate under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415(b)(2).

A. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)]

The elevated concentrations of chrysotile asbestos found in CAB and roofing material at the guard shack and the concrete ammunition bunkers roofs indicate that the potential for inhalation exposures exists.

Access to the guard shack and the ammunition bunkers is unrestricted. The guard shack is structurally unsound and in an advance state of deterioration. At both the guard shack and the bunkers, there is evidence of trespass and vandalism such as empty beer containers and graffiti.

There is not a known safe level or period of asbestos exposure. Exposure to airborne friable asbestos may result in potential health risk because persons breathing the air may breathe in asbestos fibers. Continued exposure can increase the amount of fibers that remain in the lungs. Fibers embedded in lung tissue over time may cause lung diseases, including asbestosis, lung cancer, or mesothelioma.

B. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or to be released [300.415(b)(2)(v)]

CAB and roofing material are present at the guard shack and roofing material is present at the ammunition bunkers. The accumulative effect of successive freeze-thaw temperature cycles can cause expansion, cracking, and crumbling of the CAB and roofing material, thus resulting in friable asbestos. Wind, particularly in dry summer months, can lead to the migration of small asbestos fibers, and fiber-containing particles that may remain suspended in the air for a long time and be carried long distances by wind before settling. Rainfall runoff may also result in transport of asbestos fibers.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Given the knowledge of the types of ACM found at the site, in combination with the deteriorated state of the building, it was clear that the risk of exposure to surrounding residents and the general public would increase if the building was not abated and demolished.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The scope of the removal action is limited to (1) asbestos abatement and demolition of the former Kingsley Firing Range Annex Guard Shack and asbestos abatement containing materials (ACM) at two former firing range concrete ammunition bunkers and (2) inspection of the two on-Site repositories. The building has two forms of ACM incorporated in the structure: Concrete Asbestos Board (CAB) siding and composite roofing material. The approximate concentration range of chrysotile observed in CAB and roofing material is 3 to 25 percent and 30 to 45 percent, respectively. With time and exposure to damaging mechanical forces and weather, the CAB and roofing material can continue to become friable thus releasing asbestos fibers to the environment.

Access to the former guard shack and the ammunition bunkers is unrestricted. The Guard Shack, which measures approximately 72 feet by 24 feet, is structurally unsound and in an advance state of deterioration. Two concrete ammunition bunkers are situated adjacent to the building one on the north side and one on the south side. Both measure 8’ by 8’ by 10’h and while structurally intact the roofs are in disrepair and shedding asbestos roofing material. The guard shack and the concrete ammunition bunkers are located at the northwest corner of the firing range near the entry gate along Cougar Butte Road. At both the guard shack and the bunkers, there is evidence of trespass and vandalism such as empty beer containers, broken windows, siding and graffiti. Neighbors complain that it attracts teenager and undesirables late at night all of whom are potentially being exposed to asbestos.

2.1.2 Response Actions to Date

9/4/12

EPA, START, ERRS, and First Response Inc. (ERRS subcontractor) mobilize to site. Equipment staged, site prep, and surficial abatement of asbestos containing material (ACM) on the ground surrounding the building was conducted for the balance of the day. START and OSC determine north and south locations where air sampling and DATARAM monitoring will be conducted during abatement and demolition.

9/5/12

Plastic sheeting placed over door ways and windows to provide containment for abatement of building

interior. Interior abatement begins, copious amounts of water are used on the ACM to suppress dust migration. Air sampling runs concurrently with work, two PLM and one TEM sample is run. DATARAMs are placed at both sampling locations. Two laborers are taken to Repository 2 to fill sand bags to be used to reinforce the liner covering it.

9/6/12
Interior abatement finished mid-morning, plastic sheeting used to contain exterior of building, exterior abatement begins. Strategy to address collapsing roof developed. Three quarter inch ply wood sheets are used on trusses to provide a stable platform for abatement workers. Using water to contain dust, roofing (ACM) is removed. Exterior abatement completed, roof also completed. Sampling continues.

9/7/12
Abatement "mop up" and abatement of ammo shack roofs are are completed in the morning, roll off container with 5.3 tons of ACM waste is taken from the site for off site disposal. After lunch abatement workers are taken to Repository 2 to place 80 sand bags and to do reinforcement work. This is completed in 2.5 hours and the workers are released from the site to return home. Demo crew of four begin to do demolition of abated building after lunch. Sampling continues.

9/8/12
Demo crew completes gross demolition of building by lunch, conduct "mop up" for remainder of the day. Concrete roofs of ammo dumps are coated with a thick exterior paint to encapsulate any residual tar remaining in porous surface. Two roll off boxes are filled with construction debris totaling approximately 6 tons. START departs site at approximately 700 hrs and OSC departs site at approximately 1130 hrs to return home

9/10/12
ERRS remains on site to ensure construction debris boxes are picked up and taken for disposal. ERRS departs site at approximately 1100 hrs.

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

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
ACM	Transite and roofing	5.3 tons	001		Waste Mgmt K-falls
Construction Debris	Wood, wall board	10.4 tons	NA		" "

2.2 Planning Section

2.2.1 Anticipated Activities

Limited repair to Repository 2 fastening ropes

2.2.1.1 Planned Response Activities

None

2.2.1.2 Next Steps

Repair ropes that are sun damaged.

2.2.2 Issues

none

2.3 Logistics Section

NA

2.4 Finance Section

2.4.1 Narrative

NA

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$50,000.00	$0.00	$50,000.00	100.00%
TAT/START	$10,000.00	$0.00	$10,000.00	100.00%
Intramural Costs				

Total Site Costs	$60,000.00	$0.00	$60,000.00	100.00%

* 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

2.5.2 Liaison Officer
NA

2.5.3 Information Officer
NA

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies
ODEQ, Klamath Tribe, State Historic Preservation Officer.

4. Personnel On Site

USEPA: 1 FOSC

ERRS: 1 PM

START: 1PM

ERRS Subs: 5 Abatement and 5 Construction Workers

5. Definition of Terms

None

6. Additional sources of information

6.1 Internet location of additional information/report
None

6.2 Reporting Schedule
Weekly

7. Situational Reference Materials

None