U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Southwest Vermiculite - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #4**
Initiation of Removal Action No. 2 (W. Silver Recycling and NMDOT)
Southwest Vermiculite

Albuquerque, NM
Latitude: 35.1025100 Longitude: -106.6444900

To:
From: Mike McAteer, OSC
Date: 9/26/2013
Reporting Period: September 26, 2013

1. Introduction

1.1 Background

Site Number:	NMN000607041	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	9/17/2013
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	9/26/2013	**Start Date:**	9/26/2013
Demob Date:		**Completion Date:**	
CERCLIS ID:	NMN000607041	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

This is the second Removal Action to be conducted at the Southwest Vermiculite Site. This second removal action is a time-critical removal.

1.1.2 Site Description

Asbestos has been detected in air and soils at and adjacent to the former Southwest Vermiculite Company property. Elevated levels of asbestos have also been detected in dust samples collected inside the former SWV exfoliation building which is now used as a warehouse. Current and future employees and customers located on the former SWV facility, including inside the warehouse, may be exposed to the asbestos and employees located in the railroad right-of-way may also be exposed to asbestos by way of routine commercial work activities such as walking or conducting routine rail maintenance. Transients and homeless residents are also known to frequent the railroad right-of-way using it to access other areas and in some cases, setting up temporary homes and overnight rest stops. These transients and homeless residents may therefore be exposed to asbestos through this routine use of the railroad right-of-way.

1.1.2.1 Location

The former SWV facility is located at 1800/1822 1st Street, NW in Albuquerque, Bernalillo County, New Mexico. Geographic coordinates for the site are: 35.10251º N latitude and 106.64449º W longitude, as taken from the northwest entrance to the facility.

This removal action involves three properties: 1) The W. Silver Recycling Company (former location of the Southwest Vermiculite Company); 2) The New Mexico Department of Transportation railroad right-of-way (ROW); and 3) four separate ROWs owned by the City of Albuquerque located along both 1st Street NW and Haines Avenue adjacent to the W. Silver Recycling Company. All three locations are active commercial properties that involve daily human contact with contaminated soils.

The site area is predominantly commercial/industrial however, two residential properties are located immediately north of the W. Silver Recycling company. These properties were the subject of the first removal action conducted at the SWV site in January and February of 2012.

1.1.2.2 Description of Threat

The previous emergency removal action conducted in early 2012 addressed only the residential properties located north of the former exfoliation facility. This removal action will now include the removal of asbestos contaminated soils on an active commercial facility that is open to the public and from adjacent non-residential properties that are also accessed by the public. These areas pose a risk to public health as a result of elevated levels of asbestos in the soils and in indoor dust. Effects of asbestos on the lungs is a major health concern as chronic (long-term) exposure to asbestos in humans via inhalation can result in a lung disease termed asbestosis. A large number of occupational studies have reported that exposure to asbestos via inhalation can cause lung cancer and mesothelioma (a rare cancer of the membranes lining the abdominal cavity and surrounding internal organs). The routine daily use and disturbance of the soil on these properties greatly increases the potential for exposure to human populations.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Sample results indicate the presence of Libby amphibole asbestos in both the surface and subsurface soils. Analytical results of soil samples indicate the presence of asbestos in surface soils with concentrations as high as 2%, and in subsurface soils as high as 2%. Activity Based Sampling conducted at the Site also indicates that routine work activities may be releasing elevated levels of asbestos fibers into the air from these soils and resulting in a risk to the health of the onsite workers and customers. Air sampling data from the Activity Based Sampling at and near the former SWV Site shows Libby asbestos contamination in levels ranging from < 0.0045 to 0.130 s/cc. Dust samples collected in the former exfoliation warehouse detected both Chrysotile and Libby amphibole asbestos with total asbestos dust loading concentrations exceeding the ASTM benchmark of 5,000 s/cm^2

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA Region 6 conducted a site-walk for this second removal action on Thursday September 26, 2013. This site walk and planning meeting constitutes the start of the removal action. EPA's ERRS contractor, EQM, was present for the site walk as well as our START contractor, Dynamac Corp. The owner of the W. Silver Recycling property was also present.

Documentation of site conditions, removal objectives, building replacement requirements and a myriad of other removal related matters were discussed. ERRS was immediately tasked with getting bids for a variety of items including asbestos abatement, concrete work, and warehouse construction work. The objective is to have as many tasks completed before the onsite start date of October 21.

2.1.2 Response Actions to Date

As a result of the detection of elevated levels of Libby asbestos in soil samples at the adjacent residential properties on Haines Avenue NW (Area C), EPA Region 6 conducted an emergency removal action from January 12, 2012 to February 10, 2012. During the course of the removal action, asbestos contaminated soil was excavated from all affected areas. Soil confirmation samples were collected from each grid after excavation activities. The contaminated soil was transported and disposed of at the CERCLIS-certified Special Waste Disposal Landfill located 14 miles south of Mountainair, NM. The estimated volume of waste materials disposed at the Special Waste Disposal Landfill was approximately 1,180 cubic yards of asbestos-contaminated excavated soil, vegetative debris and Personal Protective Equipment (PPE).

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

Enforcement activities including identification of PRPs continues simultaneously with the on-going removal action.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

Currently, ERRS is seeking bids on a variety of removal related items including warehouse asbestos abatement, concrete work, and warehouse reconstruction. Bids are expected to be submitted next week and decisions on subcontractors made by October 21. Profile soil samples will be collected onsite next week in anticipation of releasing RFQs for landfill disposal by the week of October 21.

Mobilization of equipment and labor to the site and start of excavation work is planned for the week of October 21, 2013.

2.2.1.1 Planned Response Activities

To mitigate the threat to the public health posed by the asbestos present in surficial and subsurface soils at the Site, as well as dust inside the former exfoliation facility, the proposed removal actions are outlined below. The removal will involve the following:

a. As necessary, continue to assess and characterize threats posed by the Site including sampling of soils for asbestos contamination in both onsite and offsite areas.

b. Excavate and remove asbestos-contaminated soils (Areas A, B and E). The excavation depth will be at least one foot below grade and no more than two feet below grade.

c. To the extent possible, complete abatement of asbestos inside the onsite warehouse (former exfoliation building). Because the structural integrity of this building is unlikely to withstand a thorough abatement process (ie.seq.), power washing) and because a good deal of the building is made of wood and is therefore difficult, if not impossible, to fully decontaminate with traditional abatement processes, then the structure will be demolished and disposed of. Coordinate with site owner on construction of a new warehouse structure.

d. Fill all excavated areas with clean fill material using an approved compaction method.

e. Dispose of contaminated soils excavated pursuant to subparagraph b. above at anEPA-approved offsite disposal facility in accordance with Section 121(d)(3) of CERCLA and 40 CFR 300.440, and transport all waste materials in accordance with Department of Transportation (DOT) rules and regulations.

f. Suppress dust and control erosion during the removal action.

g. Monitor and sample as necessary personal and ambient air during removal activities.

h. Restore the surface features to pre-existing conditions as appropriate.

2.2.1.2 Next Steps

2.2.2 Issues

No issues are noted at this time.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

- U.S. EPA Region 6
- New Mexico Environment Department

- ERRS Contractor: Environmental Quality Management (EQM)
  - Prime Subcontractor: United States Environmental Services (USES)
- START Contractor: Dynamac Corporation

4. Personnel On Site

Federal On-Scene Coordinator - USEPA: Mike McAteer

New Mexico Environment Department Representative: Phyllis Bustamante

Lead START member (Dynamac Corp.): John Koehnen

Response Manager from ERRS (EQM): Don Edgington

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.