

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Blackfeet Asbestos, TCE and Lead-based Paint Project Site - Removal Polrep  
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region VIII

**Subject:** POLREP #4  
Blackfeet Asbestos, TCE and Lead-based Paint Project Site  
A894  
Browning, MT  
Latitude: 48.9358810 Longitude: -113.0261580

**To:**  
**From:** Curtis Kimbel, OSC  
**Date:** 9/28/2015  
**Reporting Period:**

1. Introduction

1.1 Background

<b>Site Number:</b>	A894	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	8/9/2013
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	8/19/2013	<b>Start Date:</b>	8/19/2013
<b>Demob Date:</b>	9/21/2014	<b>Completion Date:</b>	9/29/2015
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

1.1.1 Incident Category

1.1.2 Site Description

The Blackfeet Asbestos Site (Site) is located in the small rural community of Browning, Montana, on the Blackfeet Reservation. The primary land uses in the area are agricultural, recreational and residential. The Blackfeet Tribe requested assistance from the EPA with demolition of several abandoned structures known to contain asbestos. The Tribe also requested the EPA characterize environmental conditions of several additional abandoned structures and demolish any that are a known threat to human health or the environment. All of the buildings are tribally owned and located on the Blackfeet Reservation. All of the structures have been vandalized and scavenged by unknown persons.

From 2004 through 2012, the EPA's Brownfields Program utilized the Superfund Technical Assessment and Response Team (START) contractor to conduct a Targeted Brownfields Assessment (TBA) on the following seven structures:

War Bonnet Lodge  
Former Evans Chevron  
Big Sky Standard  
KipCo Building  
Blackfeet Mainstream Building  
Former Blackfeet Transit Building  
Medicine Bear Shelter

The TBA identified chrysotile asbestos above actionable levels in all seven structures. The structures were demolished during August and September of 2013.

The Tribe identified an additional seven abandoned buildings suspected to contain asbestos. Asbestos sampling was completed on the buildings. Four buildings were found to be positive for asbestos and were demolished including:

Fish and Game Building  
Red Eagle Campground House  
Former Bakery-vermiculite  
Seville Community Building

Two buildings suspected of containing asbestos were sampled and found to be negative for asbestos. They include:

Hipp Building  
Sleeping Wolf Building

All of the structures were no longer used for any beneficial purpose. The structures posed a physical and environmental exposure hazard to nearby residents, users of the property, trespassers and salvagers. Given the hazards present at the Site and the proximity to residences and the public recreation area, EPA conducted a time-critical removal action at the Site.

In addition to the buildings listed above, the Tribe requested assistance with identification and disposing of hazardous waste left within several abandoned buildings and confirmation that trichloroethylene (TCE), which leaked from an underground storage tank at the Blackfeet Pencil Factory, was cleaned up properly (EPA performed a removal in the mid 1990s). The tribe also requested assistance determining the presence of asbestos at the Gun Site Dump.

#### **1.1.2.1 Location**

Primarily in the small rural community of Browning, Montana, on the Blackfeet Reservation.

#### **1.1.2.2 Description of Threat**

Chrysotile asbestos was present in the unsecured, abandoned buildings and poses an exposure threat to nearby residents, users of the property, trespassers and salvagers.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

#### **2.1.2 Response Actions to Date**

August 28, 2013 - September 29, 2015

The objectives were: Demolition of identified asbestos containing abandoned buildings, segregation of non-friable asbestos demolition debris from friable asbestos debris, hauling debris to the landfill, landfill operations, removal site air monitoring, additional asbestos sampling of structures, confirmation of structure utility closures, coordination with Tribal government representatives, and safety.

**Building Demolition:** Prior to the demolition of each building, a walk through was conducted to identify those components (as identified in assessment reports) that contained friable or potentially friable asbestos (induced by demolition) as well as any other hazardous substances to be removed prior to demolition, such as miscellaneous containers of chemicals, mercury switches and florescent ballasts (potential PCBs). These items were removed for proper disposition. Friable asbestos containing components were treated with a spray on encapsulant. Demolition then proceeded which included segregation, where feasible, of non friable asbestos containing components of the building.

Controls to prevent asbestos emissions included the spray on encapsulation of friable asbestos materials and wetting with water throughout demolition. A perimeter barrier (plastic covered construction fence) was established around each structure prior to demolition.

Segregated friable asbestos debris was placed in dump trucks and tarped; friable asbestos debris was placed in dump trucks lined with double plastic, burrito wrapped, covered with a tarp and then hauled to the landfill.

Landfill operations included the development of a cell for demolition debris disposal. Friable asbestos debris was buried at a depth of 6 to 12 feet below existing grade. Non friable asbestos debris was placed on top of friable asbestos debris 3 to 6 feet in depth. A minimum cover of 2 feet was then placed on this.

Air monitoring was conducted throughout the operation and included an upwind sampling station and one downwind sampling station. Perimeter monitoring at the Blackfeet Asbestos Removal Site was always below the OSHA PEL of 0.1 fibers per cubic centimeter.

Testing confirmed no presence of TCE at the Blackfeet Pencil Factory. Additional sampling at the Gun Site Dump did confirm the presence of asbestos and the site was cleaned up by the responsible party under direction of the Blackfeet Environmental Office.

The final action required to complete the removal was the installation of a fence with proper signage around the land fill cell containing the asbestos debris. This was confirmed mid September 2015, thus completing the removal.

#### Previous Activities

EPA mobilized the START contractor and Emergency and Rapid Response Services (ERRS) contractor to the Site beginning on August 19, 2013. A small ERRS team worked with Tribal leaders to visit each site to

ensure that power, water and propane were disconnected on all buildings and that any occupants were properly evicted. The full ERRS team arrived on Site the evening of August 22, 2013.

In accordance with a letter received from the Blackfeet Tribal Council dated August 16, 2013, a cell has been mapped and prepared at the Blackfeet landfill to accept the asbestos containing waste. An additional area at the landfill has been identified for the non-contaminated construction debris.

Demolition of the War Bonnet Lodge, the largest of the buildings, began on Friday, August 23, 2013, and took two weeks to complete.

One START contractor is on site during all demolition work providing air-monitoring support. Two START contractors visited each of the remaining sites and gathered asbestos samples including at the Margie Kennedy Center, which was assessed Monday, August 26, 2013, after the occupants had been properly evicted.

OSC Kimbel accompanied Blackfeet Environmental and Department of Emergency Services personnel to an oil spill on the reservation the morning of Monday, August 26, 2013. FX Oil had spilled approximately 20 barrels of crude oil from a valve failure. The repair crew exacerbated the problem when they completely ruptured the oil line with a backhoe while trying to find the source of the leak. The spill was called in to the NRC as FX personnel repaired the leak and cleaned up the spill under Blackfeet Environmental Program oversight.

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

### 2.1.4 Progress Metrics

#### Notable Events:

On August 28 during demolition of the War Bonnet Lodge structure, a natural gas leak occurred from the gas line at the meter stub-out at War Bonnet Lodge. EPA had been told that the line had been shut off. It was later learned that the gas company only shut the line off at the meter valve next to the building, since it did not have any other means other than shutting the line at the main line, which would have required excavation. Browning police, fire and homeland security responded to the leak---as did the gas company. Additional controls and precautions were put in place to minimize the chance of breaking another line at the remaining structures.

On August 30, OSC Guy traveled to Heart Butte with Shawn Lahr and Austin Bear Medicine of the Blackfeet Environmental Office to inspect the Margie Kennedy Building. They inspected a mural along an entire upper section of the wall inside the building that the Tribe would like to try to save. Apparently, the mural was made by a very influential spiritual leader who died 10 years ago. The group also inspected a related garage in the vicinity which, after inspection, was found not to have any of the suspect asbestos materials. During the inspection the group met with Edmund Augar and the town mayor who also requested that the mural in the Margie Kennedy Building be saved. the Blackfeet Cultural and Historical Resources Office removed the mural before the building was demolished.

Waste Stream Medium Quantity Manifest # Treatment Disposal

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

#### 2.2.1.2 Next Steps

This project is complete.

#### 2.2.2 Issues

## 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**

US EPA  
Blackfeet Reservation Tribal offices

### **4. Personnel On Site**

EPA: 1 OSC and 1 ERT member  
Blackfeet Tribal Leadership: 8  
ERRS: 20  
START: 3

### **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.