

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Pleasant Hill Asbestos Emergency Response - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region X

**Subject:** **POLREP #1**  
**Initial**  
**Pleasant Hill Asbestos Emergency Response**  
**10PS**  
**Pleasant Hill, OR**  
**Latitude: 43.9960260 Longitude: -122.9132160**

**To:**  
**From:** Dale Becker, On Scene Coordinator  
**Date:** 5/7/2016  
**Reporting Period:** 5/4/2016 - 5/6/2016

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	10PS	<b>Contract Number:</b>	EP-S7-13-07
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<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>	5/4/2016	<b>Start Date:</b>	5/5/2016
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	OR DEQ 5/4/2016
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Emergency Removal Action.

#### 1.1.2 Site Description

On April 25, 2016, Lane Regional Air Protection Agency (LRAPA) received an anonymous complaint with regards to a demolition of a burned mobile home which was beyond repair in mid-April, 2016. The home is located in a manufactured home park located on Edenvale Rd in Pleasant Hill, Oregon. The caller was concerned that the structure was being demolished without an asbestos survey. LRAPA investigated the matter and located an asbestos survey for the demolished mobile home. The asbestos survey's results consisted of positive presence of Chrysotile asbestos fibers in the housing materials consisting of the demolition debris.

On April 28<sup>th</sup>, 2016, an notice of non-compliance was reported to LRAPA from the Waste Management Division of the Lane County Department of Public Works. The notice indicated that a load of demolished, burned, mobile home material was rejected because the asbestos survey provided did not match the presented material. This survey listed an accredited asbestos inspector from an environmental firm performing and compiling the report. The environmental firm was contacted by LRAPA for a copy of the original report and identified discrepancies between the original document and document presented at the Waste Management Facility.

On April 29<sup>th</sup> 2016, LRAPA inspected the original location of the demolished mobile home and documented part of the burned mobile home structure still erect and extensive debris still remaining on site. An independent asbestos sampling effort was made by LRAPA and sent to a different accredited asbestos laboratory for analysis comprising of nine total samples of suspect asbestos containing material (ACM). Results from these samples revealed the presence of asbestos in each of two samples of roofing material (5% and 3% Chrysotile asbestos), as well as each of two samples of window putty (30% and 25% Chrysotile asbestos).

LRAPA spoke with the mobile home park manager and verified the original owner of the demolished mobile home and provided contact information for the contracted demolition company. LRAPA was also informed that the original contractor for the demolition and removal work was sub-contracted. Upon contacting the sub-contractor, LRAPA learned that the demolition was performed with the sub-contractor's children on-site without knowledge of asbestos containing materials. The sub-contractor and his family were unprotected by

personal protective equipment (PPE) such as a respirator.

The LRAPA investigation indicates that the prime demolition contractor provided an asbestos survey report with analytical results from four samples, all negative for asbestos fiber presence. As the structure was demolished, materials were hauled by the sub-contractor's (38,000 lb capacity) dump truck to the Lake County Waste Transit Center using the asbestos survey provided by the contractor as legal documentation of the materials presented for disposal. Using this survey, two loads were accepted at the transfer station and were re-located to the Lane Co. Waste Management Facility at Short Mountain, a third load was rejected at the Waste Management Facility upon suspicion of tampering with the original document. The sub-contractor was turned away and parked his loaded truck at his residence. The Waste Management Facility contacted LRAPA and filed a notice of non-compliance.

On May 2, 2016 LRAPA required the Short Mountain Landfill to hold the rejected material in the covered trailer, instructed the subcontractor not to use the truck or remove ACM materials. A Oregon State Department of Environmental Quality (OR DEQ) licensed asbestos abatement contractor covered the load at the subcontractor's home and covered a portion of the demolition debris at the mobile home park. LRAPA coordinated to have the on-site mobile home park manager spray water on the debris three times a day. The homeowner, prime contractor and subcontractor all told LRAPA they could not secure a licensed asbestos abatement contractor to conduct clean-up.

On May 3, 2016 LRAPA consulted OR DEQ and EPA Criminal Investigation Division (CID) and requested EPA Region 10 Emergency Response assistance with assessment and removal of hazardous substances.

On May 4, 2016 one OSC, two Superfund Technical Assistance Response Team (START) and the Emergency and Rapid Response Services (ERRS) Removal Manager (RM) deployed to the scene.

#### **1.1.2.1 Location**

The original release occurred in a rural residential area on Edenvale Road in Pleasant Hill, an unincorporated community in Lane County, Oregon. The site include a partially demolished burned mobile home and surrounding demolition debris.

A load of ACM and asbestos contaminated debris is located at the subcontractor's home located in a rural area on Latham Road in Cottage Grove, Lane County, Oregon.

A trailer containing a rejected load of solid waste, ACM and asbestos contaminated debris is located at the Short Mountain Landfill, 84777 Dillard Access Road, Eugene, Lane County, Oregon, 97405.

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

The material released is asbestos, a CERCLA hazardous substance. The health effects of asbestos are detailed by the ATSDR as follows:

Diseases from asbestos exposure take a long time to develop. Most cases of lung cancer or asbestosis in asbestos workers occur 15 or more years after initial exposure to asbestos. Tobacco smokers who have been exposed to asbestos have a "far greater-than-additive" risk for lung cancer than do nonsmokers who have been exposed, meaning the risk is greater than the individual risks from asbestos and smoking added together. The time between diagnosis of mesothelioma and the time of initial occupational exposure to asbestos commonly has been 30 years or more. Cases of mesotheliomas have been reported after household exposure of family members of asbestos workers and in individuals without occupational exposure who live close to asbestos mines. Significant exposure to any type of asbestos will increase the risk of lung cancer, mesothelioma and nonmalignant lung and pleural disorders, including asbestosis, pleural plaques, pleural thickening, and pleural effusions. This conclusion is based on observations of these diseases in groups of workers with cumulative exposures ranging from about 5 to 1,200 fiber-year/mL. Such exposures would result from 40 years of occupational exposure to air concentrations of 0.125 to 30 fiber/mL.

The amount of asbestos released during the demolition and fire is unknown. According to interviews with the subcontractor, ACM roofing material was cut into multiple small sections using a reciprocating saw. It is likely that the reciprocating saw released friable asbestos mixed with large volumes of sawdust which has been spread throughout the debris and ground surface. Asbestos contaminated debris is immediately adjacent to the driveway and porch of neighboring homes. The on-site mobile home park manager has witnessed cats walking through debris and neighbors entering the site to salvage debris. There is a high potential for neighbors or their pets to track friable asbestos to their homes and a risk that property owners or future residents will have ongoing exposure unless asbestos is removed.

Debris at the subcontractor's home extended above the side of the dump truck and was not completely covered with visqueen. The truck was parked adjacent to the children's swing set indicating a risk of exposure to the family. The subcontractor is not qualified to safely handle asbestos and indicated he could not hire a qualified contractor.

The rejected load at the landfill contains two to three dump truck loads of ACM and asbestos contaminated debris from the mobile home. The ACM could not be disposed of in the municipal solid waste cells per the facility permits and doing so may pose an exposure and health risk to the workers.

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

EPA, and START and ERRS contractors mobilized to the area Wednesday morning (May 4, 2016) and began work the same afternoon. EPA met with LRAPA to obtain their investigation notes, asbestos survey results and results of bulk material samples collected by LRAPA. EPA and LRAPA interviewed the mobile home park off site manager and EPA obtained an access agreement and copies of the rental agreement with the homeowner.

EPA, LRAPA, START and ERRS personnel inspected the site and debris located at the original mobile

home plot, the sub-contractor's loaded dump truck, and Lane Co. Waste Management Facility at Short Mountain. LRAPA personnel reviewed sampling results and identified the ACM in the debris. Visual inspection and interviews were conducted at each site, no debris was disturbed.

The rejected load at the Short Mountain Landfill was staged in a 48' long walking floor trailer with a capacity of 20 tons or 120 cubic yards. Investigations conducted by Lane County Waste Management Division and LRAPA indicated that the ACM materials were likely in the back of the trailer. LRAPA and Lane county Waste Management Division requested EPA support to segregate and properly dispose of ACM and suspected asbestos contaminated debris.

ACM roofing material at the mobile home site was the bottom layer of roofing material. The ACM roofing material was capped by a four inch thick white closed cell foam and then another layer of roofing. During demolition all of the roofing layers were cut at one time. The sawdust containing asbestos also contains white foam material which can be easily identified visually. The foam dust can be used as a visual indicator of the extent of contamination of the friable asbestos that was released in the sawdust. The white foam dust is visible on demolition debris, under the intact mobile home floor and on the ground surface indicating where sawdust and potentially sawdust from cutting ACM roofing was deposited. To ensure removal of friable asbestos, as a precaution, EPA intends to scrape up two inches of soil where sawdust is visible. Consultation with EPA Region 10 toxicologist indicated that this approach will be a protective of human health.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

During initial response on May 4, 2016 ERRS and START conducted minor containment by improving the cover on the truck load of debris at the subcontractor's home and covering debris in the mobile home park that was closest to neighboring residences. EPA obtained access agreements from the mobile home park manager and the subcontractor.

Background air monitoring and sampling was set up approximately 100ft from the mobile home plot on May 5, 2016 while equipment and personnel were ordered and staged. Underground utilities were located; it was confirmed that electricity was turned off. Debris in the mobile home park was wetted to control asbestos release and debris was relocated within the site in order to ensure safe access for workers. EPA obtained access agreements from the mobile home owner and neighboring home owner.

Clean-up operations began on May 6th, 2016. Debris was hand removed from mobile home space and disposed of in 20 yard roll off boxes for disposal at a facility certified for CERCLA off-site rule compliance. During removal operations water was applied to debris to prevent airborne release of asbestos. Particulate monitoring was monitored in real time using VIPER in order to monitor dust control efficacy and air samples were collected for off-site asbestos analysis. Personnel air sampling was conducted by the asbestos abatement contractor. Temporary fencing was constructed around the debris. Fences were lined with visqueen to help contain dust on site.

LRAPA and the on-site mobile home park manager organized a community meeting the morning of May 6, 2016. LRAPA provided a description of the site history, description of the health effects of asbestos. [ATSDR asbestos fact sheets](#) (see documents section) were distributed along with contact information for the [Lane County Health Department](#) (see documents), EPA OSC and LRAPA personnel. EPA provided an overview of the planned clean up operations, safety tips, and advice to limit movement of asbestos into nearby homes. Twenty four community members were in attendance; EPA and LRAPA answered questions on concerns about exposure risk and referred residents to their doctor in case of any symptoms. Community members were supportive of EPA efforts.

EPA, LRAPA and the Lane County Waste Management Division coordinated to remove approximately 40 yards of ACM and asbestos contaminated debris from the trailer and properly dispose of the materials in the permitted asbestos cell in at the Short Mountain Landfill. The facility has not been certified for CERCLA off site rule compliance, however, handling the materials twice to separate and transport to a certified facility would increase the risk of a release or exposure of workers (40CFR300.440(a)(2)).

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

##### **May 4, 2016**

###### Mobile Home Site

- Minor containment - covered debris adjacent to neighboring driveway to limit potential of exposure to neighbors

###### Subcontractor's Property

- Minor Containment - covered ACM and ACM contaminated debris in dump truck with additional visqueen to prevent friable asbestos from becoming airborne

##### **May 5, 2016**

###### Mobile Home Site

- Minor containment - wetted ACM and asbestos contaminated debris to prevent friable asbestos from becoming airborne
- Collected background air monitoring and sampling
- Located underground utilities and verified power and gas service is off
- Moved ACM and asbestos contaminated debris to ensure safe work area and access for workers

- Ordered personnel and equipment and staged equipment
- Requested 1 additional OSC, 1 additional START, additional air monitoring and air sampling equipment. OSC Fowlow deployed to be available to start work on site on May 6, 2016.
- Limited availability of disposal containers and haul trucks limit clean-up activities

## May 6, 2016

### Mobile Home Site

- LRAPA and EPA held community meeting with 24 people in attendance
- 10 certified asbestos workers lined two 20 yard roll off bins with two layers of 6 mil reinforced poly sheeting and loaded ACM and asbestos contaminated debris; debris was covered with two layers of 6 mil reinforced poly
- OSC monitored operations to ensure proper personal protective protection (PPE) and BMPs were followed, including:
  - established an exclusion zones for safety,
  - set up a decontamination zone,
  - watered material during movement for dust control.
- Chain link fencing around the property boundaries was set for added security and residential protection
- Two air samplers and monitors were deployed approximately 10ft North and South of the mobile home unit. Air monitor concentrations were monitored real-time by START
- Background air monitoring and sampling was conducted 100 feet away from operations

### Short Hill Landfill

- Double layer 6 mil reinforced poly liners were constructed by asbestos abatement crew within the permitted asbestos disposal cell
- Waste was slowly dumped onto liner by landfill staff while asbestos workers in level C PPE wetted material to prevent asbestos from becoming airborne
- Approximately 40 yards of waste was covered with two layers of 6 mil reinforced poly and left in place for permanent cover by landfill staff
- All operations at the landfill were completed

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

Potentially responsible parties have been identified.

### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
ACM and asbestos contaminated debris	solid debris	80yd <sup>3</sup>			

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

Removal of ACM and asbestos contaminated debris, air monitoring and air sampling will occur at the mobile home site and the subcontractor's home.

#### 2.2.1.1 Planned Response Activities

- Continue removing ACM and asbestos contaminated debris at mobile home site
- Begin removal of contaminated mobile home flooring in order to gain access to potentially contaminated saw dust that was released under the home
- Stage roll-off containers at subcontractor's home
- Remove ACM and asbestos contaminated debris at subcontractors home. Clean dumper bed to ensure no residual contamination is left behind

#### 2.2.1.2 Next Steps

Continue with removal action as outlined and maintain site documentation.

#### 2.2.2 Issues

Availability of disposal containers and trucks for transport may limit the pace of removal actions.

## 2.3 Logistics Section

ERRS is currently working to obtaining adequate disposal containers and transport to disposal facility.

## 2.4 Finance Section

No information available at this time.

## **2.5 Other Command Staff**

### **2.5.1 Safety Officer**

Erin Cafferty, START. All workers in contaminated zone in Level C PPE. Morning safety briefings are held daily. Adjusting operations based on real time air monitoring results.

### **2.5.2 Liaison Officer**

No LNO on site, the OSC is coordinating with cooperating agencies. OR DEQ and Oregon State Fire Marshall's office was notified of mobilization on May 4, 2016.

### **2.5.3 Information Officer**

No Information officer on site. OSC is interfacing with the community; there have been no media inquiries. OSC Becker received support crafting message for public meeting from the Community Engagement Unit Manager and EPA Toxicologist.

## **3. Participating Entities**

### **3.1 Unified Command**

EPA Region 10, Dale Becker, OSC

### **3.2 Cooperating Agencies**

Lane Regional Air Protection Agency (LRAPA)

## **4. Personnel On Site**

EPA - 2

START - 3

ERRS - 13

LRAPA - up to 5 as needed

## **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.