U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
North Little Rock Auto Salvage - Removal Polrep
Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #8**
Final
North Little Rock Auto Salvage
A6R3
North Little Rock, AR
Latitude: 34.7585005 Longitude: -92.2262171

To:
From: Mike McAteer, OSC
Date: 1/2/2017
Reporting Period: May 1, 2016 to December 16, 2016

1. Introduction

1.1 Background

Site Number:	A6R3	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/19/2012
Response Authority:	CERCLA	**Response Type:**	PRP Oversight
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	10/6/2015	**Start Date:**	10/7/2015
Demob Date:	12/16/2016	**Completion Date:**	12/16/2017
CERCLIS ID:	ARN000607042	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time Critical Removal Action - RP-lead

1.1.2 Site Description

The North Little Rock Auto Salvage site is located at 600 Dixie Street in North Little Rock, Arkansas.This site was a former vermiculite exfoliation facility which was operated by the W.R. Grace Corp. from 1966 to 1986. This Site was assessed by EPA region 6 in multiple phases over the period of 2011 to 2013, as part of an Agency-wide initiative to investigate current and former vermiculite facilities. This site received approximately 85,000 tons of vermiculite ore from the W.R. Grace vermiculite mine in Libby, Montana. As a result of soil sampling conducted by EPA in July 2012, as well as Activity-Based Sampling (ABS) conducted in June 2013, several residential properties (i.e., "Lots") located along Dixie Lane were determined to contain levels of asbestos requiring removal. This includes various portions of Lot 9 (commercial) and the front yards of (residential) Lots 40, 42 and 55. Following negotiations with W.R. Grace, and an executed Administrative Order on Consent (AOC), W.R. Grace agreed to conduct additional ABS in the backyards of Lots 40. 42 and 55 and to remove soil from the impacted properties, followed by confirmation soil sampling, additional ABS and site restoration. This removal work in the residential area south of the former exfoliation site is referred to as Phase 1 under the AOC.

Prior sampling on-site and around the main building was also conducted by EPA up to 2013. Several on-site areas were identified as requiring excavation and disposal of impacted soil, however additional sampling and assessment of on-site areas and surrounding properties was recommended. The Phase 2 activities were meant to further evaluate conditions on the former site, as well as on several Lots comprising the following: Lot 0 which is the former NLRSY site, Lot 1 which is to the north and owned by Union Pacific Railroad, Lots 2 and 3 which are located to the east/southeast and are active commercial properties, Lot 8 to the west/southwest which is vacant wooded land, Lot 12 to the west which is vacant wooded land and Lots 23 and 24 to the northwest which are land plots owned by the city of North Little Rock and Entergy respectively.

During Phase 2 activities, the RP assessed and/or sampled soil from over 200 grids on the Lots described above and analyzed the resulting soil for Libby asbestos using CARB 435. The RP also conducted activity-based sampling (ABS) at 20 locations on or around the site and directly along/on the railroad tracks and collected air samples which were analyzed for Libby asbestos through the ISO 10312 Method by Transmission Electron Microscope (TEM). Lastly, during Phase 2, EPA and Grace/OTO also conducted an

assessment of the main onsite building on the NLRSY (Lot 0) property followed by sampling of dust present in the building via Micro-vac and analysis of the resulting air cassettes via ISO 10312. Of the approximately 30 samples collected, two samples/locations were deemed to be impacted with Libby asbestos.

Based on the soil, ABS (air) and Micro-vac (air) samples collected during the Phase 2 activities described above, a Phase 3 Removal Action was conducted in 2016.

1.1.2.1 Location

The Phase 2 activities for the NLRSY site comprised several activities meant to further evaluate conditions on the former site, as well as on several "Lots" adjacent to the site in the western, northern and eastern directions. The Lots comprise the following: Lot 0 which is the former NLRSY site, Lot 1 which is to the north and owned by Union Pacific Railroad, Lots 2 and 3 which are located to the east/southeast and are active commercial properties, Lot 8 to the west/southwest which is vacant wooded land, Lot 12 to the west which is vacant wooded land and Lots 23 and 24 to the northwest which are land plots owned by the city of North Little Rock and Entergy respectively. These Lots are bounded by Range Line Avenue to the west, to Sam Evans Drive to the north and to Dixie Street to the east, and also bounded to the south by the UP owner railroad tracks.

1.1.2.2 Description of Threat

As a result of the soil sampling previously conducted on-site (Lot 0), it was determined that several areas were impacted by asbestos either in soils at levels at or above 0.25%. In addition, it was determined that additional soil, ABS and indoor/Micro-vac samples were required in other areas of Lot 0 and in the nearby properties to fully assess whether Libby asbestos exists at concentrations warranting removal or other action. The target screening levels of 0.001 structures per cubic centimeter (s/cc) for commercial properties (Lots 0, 1, 2, 3, 8, 12, 23 and 24) applies. The target screening levels were generated through a site-specific risk assessment completed by EPA.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

As part of the Phase III activities, the RP prepared and submitted to EPA the Draft Phase III Work Plan on May 10, 2016. After the EPA reviewed and provided the RP with a list of required revisions, the RP Work Plan was revised and re-submitted as Final on June 8, 2016. The RP issued Solicitation Bid Packages to potential subcontractors on May 20, 2016. On May 25, 2016, the RP awarded ABSCOPE a subcontract to conduct the removal activities at the site. On June 1, 2016, the consultant to the RP, OTO, and the removal contractor, ABSCOPE mobilized to the site and conducted the following activities: a) staking of planned excavation limits and locations for construction trailers; b) brush clearing for installation of security fencing and storm water situation fencing; c) testing of site fire hydrants; d) access roads and staging area improvements; e) installation of silt fencing; and f) delivery of equipment, materials, and supplies. The EPA OSC and START mobilized to the site of June 15, 2016.

Activities conducted by the RP-contractors during the course of the removal activities included: a). Removal of surface debris; b) asbestos-containing soils (ACS) excavation; c) perimeter air monitoring; d) post-excavation soil sampling; e). post-excavation Activity-Based Sampling (ABS); f). backfilling and site restoration; g). power washing of concrete pads;and h) building clearing and abatement. Each listed removal activity will be described below.

On June 16, 2016, the RP-led contractors began the removal of surface debris (e.g. wood, furniture, tires, etc.). Surface debris was rinsed with potable water to remove any soil residues. The rinsing was conducted in an area of future soil excavation. Rinsed wood, furniture and construction/demolition (C/D) debris were placed into metal containers for shipment to Two Pine Landfill. Surface debris removal was completed by July 15, 2016, with approximately 34 tons of surface debris transported to Two Pines Landfill in Pulaski County. Abandoned and unused tires were rinsed and stockpiled until disposed at Davis Rubber located in Little Rock, Arkansas.

ACS excavation began on June 21, 2016 and was completed on December 2, 2016. Soil excavation was conducted in the areas identified in the Phase III RP Work Plan. ACS was generally excavated to a depth of 0.5 to 1.5 feet below grade using a CAT Model 326 excavator with a smooth faced bucket; however, it should be noted that depths greater than 1.5 feet below grade were excavated in certain sub-areas (e.g. an excavation depth of 6.5 feet was reached in Sub-Area 5). Dust suppression activities were conducted concurrently with the ACS excavation activities. All excavated ACS was transported under manifest to the Two Pines Landfill located in Pulaski County. By December 16, 2016, approximately 44,165 tons of excavated ACS was transported to the Two Pines Landfill.

Perimeter air monitoring was conducted on a daily basis by OTO staff during all ACS excavation and truck loading activities. Four perimeter air monitoring stations were established at the four cardinal points (North, South, East, and West). Additional air samples downwind of the excavation areas and downwind of the stockpile loading area were also collected. The air samples were collected for asbestos testing (NIOSH 7400) by Safety & Environmental Investigations, Inc. (SEI) of Little Rock, Arkansas. In addition, a pDR dust monitor was placed at the air monitoring station and provided real time dust monitoring, along with daily averaging. The perimeter air monitoring results can be found in the RP Progress Reports.

Post-excavation soil sampling was conducted by OTO in each sub-area and grid that was excavated for ACS. Five-point composite soil samples were collected from the base of the completed excavation grid areas. The confirmation soil samples were submitted to Batta Laboratories, Inc., for analysis by USEPA Standard Operating Procedure for CARB 435. If analytical results indicated the presence of amphibole asbestos fibers in concentrations 0.25% or greater, the grid was re-excavated and re-sampled until Non-detects were achieved. All soil sampling results can be found in the RP progress reports generated by OTO. Per OSC direction, START-3 did collect occasional split surface soil samples from selected grids.

Once a grid was excavated and confirmation soil sampling indicated Non-Detect results for amphibole asbestos, then certain selected grids within the eight (8) sub-areas were sampled for confirmation utilizing Activity-Based Sampling (ABS). Per the EPA Order issued to the RP, the scenario chosen for confirmation was Raking. The ABS sampling was conducted in dry conditions (soil moisture content less than 17%) and consisted of two Raking scenarios, each scenario lasting for 120 minutes. During an ABS scenario event, high and low flow samples were collected, in addition to a downwind, upwind, and background air samples from stationary air sampling locations. The collected ABS air samples were submitted to Bureau Veritas for asbestos analysis by ISO 10312 methodology. If detected asbestos concentrations exceeded 0.0010 structures per cubic centimeter (s/cc), then the grid did not pass the ABS test and additional soil excavation was conducted until asbestos concentrations ranged from Non-Detect to < 0.001s/cc. All RP ABS sampling results can be found in the RP progress reports generated by OTO.

Once a sub-area was deemed clean by soil and ABS sampling and given approval by the EPA OSC, the sub-area was backfilled with clean soil or crush rock, depending upon the grid location. This activity commenced on July 15, 2016 and was not completed until December 15, 2016. The submitted RP progress reports give the progression of backfilling operations at the site.

Power washing of the various concrete pads commenced on July 12, 2016, and were completed in December 2016. During power-washing activities, the rinsate was directed to unexcavated areas, as specified in the approved Phase II Work Plan. Once power-washing had been completed at a concrete pad, it was inspected by an OTO Arkansas licensed asbestos inspector in accordance with ASTM Method E 1368.

Beginning in August 2016, ABSCOPE crews removed debris from the 1st and 2nd floors of the on-site building. The crews fabricated wood frames for later use to block critical barriers (such as doors and windows) inside the building in preparation for the asbestos abatement. The building cleaning was completed by December 3, 2016. A third party contractor was obtained to conduct the clearance sampling the week of December 5, 2016. Ten micro-vac dust samples were collected from the second floor after cleaning was complete. Seven of these samples were collected on the floor of the second floor and the other 3 were collected elevated from and an elevated steel beam or concrete platforms. Once the 2nd floor samples were collected the asbestos abatement crew started cleaning the section of the first floor requiring asbestos abatement. Three first floor mico-vac dust samples were collected. One was collected on the floor and the other two were collected from elevated concrete platforms. Two of the second floor dust sample results from the west side of the second floor had detections above the target action levels. The asbestos crew cleaned this side of the 2nd floor again and six more mico-vac dust samples were collected. All micro-vac dust samples are now below the target action levels. The dust samples were analyzed for asbestos by ISO 10312 methodology. The dust results did not indicate the presence of asbestos in concentrations exceeding the established benchmark of 5,000 s/squared centimeter.

On December 16, 2016, it was determined that the RP-led removal actions had been completed and the RP contractors and START-3 demobilized from the site.

2.2 Planning Section

2.2.1 Anticipated Activities

There are no anticipated activities related to this removal action. All activities were completed on December 16, 2016.

2.3 Logistics Section

Not Applicable

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

W.R. Grace and their Consultant OTO, or applicable subcontractors, performed the role of Safety Officer for the RP-led Removal Action. EPA and START developed complementary Health and Safety Documentation or Directives, but also adhered to the H&S policies (e.g., work zones) defined by OTO

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

Bill Little of EPA's Public Information Office is the PIO

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

Not Applicable

3.2 Cooperating Agencies

Arkansas Department of Environmental Quality (ADEQ)
Arkansas Department of Emergency Management (ADEM)
Arkansas Department of Health (ADH)

4. Personnel On Site

Personnel and Affiliations

- W.R. Grace is represented on-site by personnel from OTO, and/or their subcontractor firm Abscope.

- EPA is represented by On-Scene Coordinator (OSC) Mike McAteer. OSC McAteer has assigned a Representative from START Contractor CSS-Dynamac (John Koehnen, Steve Cowan) and CH2M Hill (Patrick Mickal) to conduct Oversight of the RP-Led Removal Action activities and to document or advise the OSC as appropriate.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

Not Applicable

6.2 Reporting Schedule

Per the AOC, W.R. Grace and OTO are required to provide a Bi-weekly Progress Report to the OSC, START and other interested parties. START also develops and distributes (upon OSC approval) a Periodic Progress Report which summarizes the PRP and START activities conducted as well as anticipated along with a summary of any pertinent analytical data and photo documentation

7. Situational Reference Materials

No information available at this time.