

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
WR Grace River Road - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #2
Final POLREP
WR Grace River Road
A604
Metairie, LA
Latitude: 29.9501478 Longitude: -90.1712668

To:
From: Mike McAteer, On-Scene Coordinator
Date: 1/25/2017
Reporting Period: November 1, 2016 to January 25, 2017

1. Introduction

1.1 Background

Site Number:	A604	Contract Number:	
D.O. Number:		Action Memo Date:	4/21/2016
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/10/2016	Start Date:	10/10/2016
Demob Date:	1/25/2017	Completion Date:	1/25/2017
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

The response was conducted as a Time-Critical Removal Action by the Responsible Party (W.R. Grace),, with Oversight of all critical and related activities by EPA and/or START as directed by the OSC.

1.1.2 Site Description

W.R. Grace previously operated a vermiculite exfoliation facility on this property. The WRGRR property is currently managed by the Deckbar Realty Company and is unoccupied. Assessment activities on and surrounding the facility were conducted in 2014. Results of the assessment showed asbestos-contaminated soil in two locations directly east of the former exfoliation building and due north of the building along the abandoned rail spur. Dust inside the building was also found to contain elevated levels of asbestos. Removal activities were started at the site the week of October 17th beginning with excavation of soils in two contaminated grids east of the building. Dust abatement inside the building began the week of November 7th.

1.1.2.1 Location

The site is located at 4729 River Road in Jefferson, Jefferson Parish, Louisiana.

1.1.2.2 Description of Threat

Asbestos contamination in the form of Libby Amphibole (LAA) has been identified in soil in several areas near the former site, as well as in "dust" sampled from within the former exfoliation building.

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

Removal Assessment activities were conducted by EPA in 2014 and resulted in a Removal Assessment Report which defined the required removal actions for the site. EPA subsequently entered into negotiations with W.R. Grace regarding the requirements of the Removal and both parties signed the Administrative Order on April 21, 2016.

The following section gives a time line and briefly summarizes the activities conducted during the

Responsible Party (RP)-led Removal activities:

Week ending September 19, 2016: The RP contractor began and completed the installation of the perimeter fence and signage around Area B (vacant lot). The RP consultant collected two waste profile soil samples, one sample from Area B and one sample from Area D, and shipped them to procured laboratories for chemical and asbestos analyses. START-3 conducted oversight of the RP-fence installation and collection of waste profile samples.

Week ending September 26, 2016: No site work was conducted by either the RP contractor or consultant.

Week ending October 3, 2016: The RP contractor and consultant mobilized to the site and began to set up the command trailer, the decontamination trailer and pad, and the sanitation facilities in preparation of the scheduled removal activities.

Week ending October 10, 2016: The RP contractor and consultant continued to set up the trailer, the decontamination trailer and pad, and the sanitation facilities. In addition, the RP contractor collected backfill samples and shipped the collected backfill samples to procured laboratories for asbestos and chemical analyses. START-3 conducted oversight of the collection of backfill samples.

Week ending October 17, 2016: The RP contractor constructed the Haul Road in Area B and began the soil excavation, dust suppression and loading activities in Area B, grids 004 and 005. The RP consultant collected the first set of post-excavation soil confirmation samples and shipped the collected soil samples to Batta Laboratories for asbestos analysis by CARB 435. In addition, the RP consultant conducted perimeter air monitoring/sampling during soil excavation and loading activities in Area B. START-3 conducted oversight of all the RP-led removal activities.

Week ending October 24, 2016: The initial soil excavation in Area B, grids 004 and 005 was completed on October 17, 2016; however, the CARB 435 results of the collected soil confirmation samples indicated concentrations of asbestos greater than 0.25% by weight in both grids. As a result of the lab results, the RP contractor began to re-excavate the contaminated soil from Area B, grids 004 and 005. The re-excavation of Area B, grid 004 was completed on October 21, 2016. The RP contractor re-collected post excavation soil confirmation samples from grid 004 and shipped the samples to Batta Laboratories for asbestos analysis. In addition, the RP contractor continued to conduct perimeter air monitoring/sampling in Area B. Due to the re-excavation of soil in Area B, the RP consultant sent a letter to the U.S. Army Corp of Engineers (USACOE) requesting an extension of the site excavation limits to 3 feet below grade. The USACOE approved the request on October 21, 2016. START-3 conducted oversight of all the RP-led removal activities conducted during this week.

Week ending October 31, 2016: The RP contractor finished the soil excavation/loading activities associated with Area B, grid 005. Approximately 765 tons of asbestos contaminated soils (ACS) had been excavated and transported to the Jefferson Parish Landfill for off-site disposal. In addition, the RP contractor began preparing for soil excavation activities in Area D, (Railroad Spur) by constructing a gravel access road; and began to prepare the inside of the warehouse building (Area A) for cleaning and abatement. The RP consultant collected post excavation soil confirmation samples from grid 005 and submitted the soil samples for asbestos analysis by CARB 435. In addition, the RP consultant continued to conduct perimeter air/sampling in Area B. START-3 conducted oversight of all the RP-led removal activities.

Week ending November 7, 2016: The RP contractor mobilized equipment to Area D for the upcoming soil excavation activities and began the cleaning/abatement inside the warehouse building (Area A). Cleaning consisted of HEPA vacuuming and wet wiping of walls, joints, and floors. The RP consultant conducted Activity-Based Sampling (ABS) in Area B. The collected ABS samples were shipped to Bureau Veritas for asbestos identification and quantification by ISO 10312, a Transmission Electron Microscopy (TEM) method. START-3 conducted oversight of all the RP-led removal activities.

Week ending November 14, 2016: Due to a large amount of rainfall received on November 7, 2016, the RP contractor pumped the standing water in Area B to a 20,000 gallon fractionation tank until arrangements could be made to release to the city storm water drain system. The RP consultant received the ABS test results, which indicated the presence of asbestos in concentrations exceeding the removal action level 0.0011 f/cc. Based on these results, the RP contractor re-excavated the ACS located in Area B, grids 004 and 005. In addition the RP contractor continued to conduct cleaning/abatement operations inside the warehouse (Area A). It was estimated that 75% of the inside of the building had been cleaned/abated. The RP consultant continued to conduct perimeter air monitoring/sampling during the re-excavation of Area B, grids 004 and 005. START-3 conducted oversight of all the RP-led removal activities.

Week ending November 21, 2016: No soil excavation activities were conducted in Area B during this reporting week. The RP consultant conducted ABS in Area B, grids 004 and 005 and shipped the collected ABS samples to Bureau Veritas for asbestos identification and quantification by ISO 10312. The RP contractor completed the cleaning/abatement activities inside the warehouse (Area A). The RP contractor conducted Removal Clearance Sampling with the collection of indoor dust and air samples. The dust samples were shipped to Bureau Veritas for asbestos analysis by ASTM 5755/ISO 10312 methodologies and the collected indoor air sample was shipped to Batta Laboratories for fiber determination by NIOSH 7400. START-3 conducted oversight of all the RP-led removal activities.

Week ending November 28, 2016: After receiving the ABS results, which indicated no asbestos detections, from samples collected the previous week, the RP contractor began the excavation of the Haul Road in Area B. The RP consultant conducted perimeter air monitoring/sampling during the excavation of the Haul Road in Area B. The RP consultant received the indoor dust and sample results from the procured laboratories. The indoor dust and air results did not detect the presence of asbestos or fibers exceeding the action levels of 5,000 f/cm² (dust) and 0.01 f/cc (air). START-3 conducted oversight of all the RP-led removal activities.

Week ending December 5, 2016: The RP contractor completed the excavation of the Haul Road in Area B. A total 1,400 tons had been excavated from Area B and transported to the Jefferson Parish Landfill for off-site disposal. The RP consultant collected the final post-excavation soil confirmation samples from the former Haul Road and shipped the samples to Batta for asbestos analysis by CARB 435 methodology. In addition, the RP consultant conducted the final perimeter air monitoring/sampling for Area B. The RP contractor finished demobilizing all cleaning/abatement equipment from the warehouse (Area A). In addition, the RP contractor mobilized to Area D and removed the corresponding railroad rails from the grids to be excavated. The rails were removed, washed, and placed outside the area of planned excavation. This was completed on December 1, 2016. START-3 conducted oversight of all the RP-led removal activities.

Week ending December 12, 2016: The RP contractor began soil excavation activities in Area D. The soil was excavated to a depth of 2.5 feet below grade. The RP consultant conducted perimeter air monitoring/sampling in Area D. START-3 conducted oversight of all the RP-led removal activities.

Week ending December 19, 2016: Because the soil confirmation sample collected from the former Haul Road in Area B indicated asbestos concentrations exceeding 0.25% by weight, the RP contractor continued and completed the soil excavation of the Haul Road in Area B to depth of three feet below grade. In addition, the soil excavation of Area D was completed, with approximately 1,010 tons of excavated soil from Area D. A total of 2,582 tons of ACS was excavated from Areas B and D and transported to the Jefferson Parish Landfill for off-site disposal. The RP consultant conducted the final air monitoring/sampling in Areas B and D and collected the final post-excavation soil confirmation samples from Areas B and D. The collected soil samples were shipped to Batta for asbestos analysis by CARB 435. START-3 conducted oversight of all the RP-led removal activities.

Week ending 12/26/2016: Due to the heavy amount of rainfall, the RP contractor tried to re-direct the flow of rainfall runoff from the adjacent buildings near Area D. The Area D excavation area had become flooded with standing water. No other work was conducted during this reporting period due to the Christmas holiday schedule.

Week ending December 31, 2016: The RP consultant prepared for ABS activities in Area D; however, due to the heavy amount of rainfall received, the ABS activities could not be conducted.

All removal activities were completed on January 25, 2017. A total 2,955 tons of ACS were excavated and disposed of from the site.

2.1.3 Responsible Party

W.R. Grace was identified as the primary responsible party and agreed to conduct the defined Removal Action

2.1.4 Progress Metrics

<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

All work was completed on January 25, 2017. No further action is planned.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

None planned.

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

2.5.1 Safety Officer

The RP and their Consultants provided their own safety personnel, while EPA personnel and/or START personnel conducting oversight operate under their own safety plans which are in general compliance with the RP-Led activities.

2.5.2 Liaison Officer

2.5.3 Information Officer

The Information Officer (i.e., Community Involvement Coordinator) for the site was Bill Little, a SEE employee of U.S. EPA Region 6.

3. Participating Entities

3.1 Unified Command

Not Applicable

3.2 Cooperating Agencies

EPA was the primary Agency for this RP-Led Removal Action.

4. Personnel On Site

EPA was represented on-site/off-site by OSC Mike McAteer, with START personnel from CSS-Dynamac conducting Oversight under the direction of OSC McAteer.

5. Definition of Terms

NA

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

Additional site related reference documents are available on the EPAOSC.NET Web Page for this Site.