United States Environmental Protection Agency
Region VI
POLLUTION REPORT

Date: Tuesday, July 3, 2018
From: Mike McAteer, On-Scene Coordinator

Subject: Henley Sealants, Responsible Party, Phase II Removal Actions
Henley's Sealant
200 North Wisconsin, Oklahoma City, OK
Latitude: 35.4695083
Longitude: -97.4773694

POLREP No.:	6	**Site #:**	SS ID: A6R4
Reporting Period:	Final	**D.O. #:**	0066
Start Date:	8/5/2017	**Response Authority:**	CERCLA
Mob Date:	10/2/2017	**Response Type:**	PRP Oversight
Demob Date:	6/16/2018	**NPL Status:**	Non NPL
Completion Date:	6/20/2018	**Incident Category:**	Removal Action
CERCLIS ID #:	OKN0006070040	**Contract #**	EP-S6-07-01
RCRIS ID #:			

Site Description

The Henley Sealants Site is located at 200 North Wisconsin Avenue in Oklahoma City Oklahoma County, Oklahoma. The Site was formerly the W. R. Grace Zonolite vermiculite expansion facility. Records indicate vermiculite exfoliation was occurring at the site as early as 1957. Vermiculite exfoliation occurred at the site as records indicate that the facility accepted approximately 113,905 tons of raw vermiculite between 1967 and 1988, from the WR Grace mine located in Libby, Montana. The date that Zonolite/WR Grace began vermiculite exfoliation at the site is not known; however, WR Grace ceased operations at the facility in 1991 or 1992. WR Grace Company sold the facility to Henley's Sealants Incorporated in 1994.

EPA's removal evaluations were conducted at the Site in April 2010 in response to an Agency-wide initiative to investigate current and former vermiculite facilities that received vermiculite ore from the W.R. Grace vermiculite mine in Libby, Montana. The Phase I removal action addressed the need to mitigate the potential threats posed by asbestos contaminated soils located on-site from the processing of vermiculite ore and the disposal of associated waste products at this Site by W.R. Grace/Zonolite Co.

Phase II Responsible Party (RP) removal actions will occur in Areas J, North and Area N, located east of Martin Luther King (MLK) Boulevard. Area J North consists of frontage located on the north side of NE 4th Street and south of the James E. Stewart Municipal Golf Course. A bicycle path transects Area J, North into northern and southern sections. Asbestos analysis of surface soil and ABS samples collected as part of the Phase I assessment indicated the presence of Libby Amphibole Asbestos (LAA) in the soil at concentrations ranging between non-detect and greater than 0.25% and in the air in concentrations exceeding the risk-based action level of 0.0034 fibers per cubic centimeter (f/cc).

Area N consists of several parcels of land located east of MLK Blvd. and south of NE 4th Street. The parcels of land include First Star Waste Disposal Company, Karchmer Pipe & Steel Company, Redhen Oil Company (oil well and tank battery), Johale, LLC (Vacant lot) and Chem Can Services Inc. Asbestos analysis of surface and subsurface soil and ABS samples collected as part of the Phase I assessment indicated the presence of LAA in the soil at concentrations ranging between non-detect and greater than 0.25% and in the air at concentrations exceeding the risk-based action level of 0.0010 fibers per cubic centimeter (f/cc).

Based on the analytical results obtained during the Phase I assessment activities, the EPA and RP entered into an agreement and signed an Administrative Order on May 31, 2017 for the RP to conduct Phase II removal assessment activities and removal actions in Areas J, North and N. The RP contractor prepared a Pre-Removal Work Plan, a Quality Management Work Plan (QMP) and a Health and Safety Plan (HASP) for the Phase II removal assessment activities. The RP contractors conducted limited soil sampling in Area J, North and in residential property located south of the First Star Waste Disposal facility in August 2017. In addition, additional ABS activities were conducted at Karchmer and Johale, LLC. Due to inclement weather, scheduled ABS activities at Chem Can and in the vacant lot associated

with Johale were not conducted. Polarized Light Microscopy (PLM) analysis of the collected surface soil samples detected the presence of LAA in concentrations ranging from trace (0% to < 0.25%) to greater than 0.25%. The ABS results indicated exceedances of the 0.0010 f/cc action level at Karchmer and Johale, LLC. Based on the results, the RP and RP contractor prepared a Quality Post-Assessment Removal Work Plan.

During the RP-led Phase II removal activities, the RP conducted ABS activities at the Chem Can facility (Grids 60 to 68) located east of the Johale, LLC vacant lot in October 2017. Two Fork Lift (simulated by golf carts) scenarios were conducted as part of the ABS activities. TEM analysis by ISO 10312 methodology did not detect the presence of LAA fibers in concentrations exceeding the action level of 0.001 fibers per cubic centimeter, thus, the RP did not have to excavate Grids 60 to 68 associated with the Chem Can facility. In addition, the RP contractors conducted ABS activities in Grids 45 to 55 located in the southeast section of the Johale, LLC vacant lot during October 2017. The ABS scenarios conducted included lawn mowing and raking. TEM analysis of the collected ABS samples indicated exceedances of the 0.001f/cc action level, thus the RP contractors had to excavate the soil associated with Grids 45 to 55.

Current Activities

The RP contractors (OTO and Abscope) mobilized to the site (Area N) on October 2, 2017 to begin the Phase II removal actions. Upon arrival, the site was prepared for the Phase II removal activities with the construction of a gravel-based road, set up of the RP contractor and EPA/START trailers; construction of temporary fencing, and truck decontamination pad. On October 8, 2017, START mobilized to the site to begin RP oversight activities (written and photographic documentation). On October 10, 2017, the RP contractors began soil asbestos-contaminated soil (ACS) excavation from grid 22 (Redhen Oil Well). Between October 10, 2017 and February 15, 2018, the RP contractors excavated ACS from the Johale, LLC vacant lot and Area J North.The excavated ACS was loaded and hauled to a temporary soil stockpile located on the Johale, LL property. The excavated soil was loaded into truck end dumps and transported to an Oklahoma Department of Environmental Quality permitted landfill, Waste Connections, in southwestern Oklahoma City. Approximately 31,698 tons of excavated ACS was hauled to the waste connections landfill during this time period. During the soil excavation, loading, and stockpiling of the asbestos-contaminated soil, dust suppression in the form of water spraying was conducted by the RP contractor. After ACS excavation was completed, the RP contractor collected soil confirmation samples, in which START collected a split soil sample from the RP. The collected soil confirmation samples were analyzed for asbestos by Polarized Light Microscopy (PLM). Those samples in which there was no asbestos detected and trace concentration detected, the grids were cleared for backfilling and restoration. During all soil excavation, hauling, and loading operations, the RP contractor conducted perimeter air monitoring with a pDR for particulates and conducted perimeter air sampling. The perimeter air samples were analyzed for total fibers by NIOSH 7400. All grids associated with the Johale LLC vacant lot and Area J North were completed of backfill and site restoration activities by March 7, 2018.

On March 8, 2018, the RP contractors began ACS excavation in Grid 76 located on the Karchmer Pipe and Steel Company. ACS excavation at Karchmer (Grids 76 to 98), First Star Waste Disposal Company (Grid 02), and the Plunkett property (Grid 100) was completed by May 17, 2018. Approximately 17,125 tons of ACS was excavated , loaded, and transported to the Waste Connections landfill from these three sections of Area N. As with the Johale, LLC and Area J, N grids, soil confirmation samples and ABS air samples were collected and analyzed for asbestos. Those soil and ABS samples that did not detect or had trace concentrations of asbestos and did not exceed the air action level of 0.001 f./cc were cleared for backfill and site restoration activities. All backfilling and site restoration activities were completed in these three sections of Area N by June 14, 2018.

On May 17, 2018, the RP contractors began ACS excavation at the Redhen Oil and Tank Battery (Grids 56 to 59). Prior to ACS excavation the saltwater storage tank and the oil storage tanks were removed from Grids 58 and 59 and placed outside the fence line until the ACS excavation was completed in those grids. The ACS soil excavation at the Redhen Oil Well and Tank Battery was completed on May 31, 2018. Approximately 3,222 tons of ACS was excavated from the Redhen Oil Well and Tank Battery property. Trace asbestos concentrations were detected in the collected/analyzed soil confirmation samples collected from Grids 56 to 59. All backfill and restoration activities associated with these grids was completed on June 14, 2018.

The RP contractors excavated an approximate total 52,045 tons of ACS during the Phase II activities associated with the Henley Sealants site.

START personnel demobilized from the site on June 9, 2018, per OSC instructions, after all soil excavation had been completed and the soil confirmation sample results indicated trace contractions of

asbestos.

The RP contractors demobilized from the site on June 15-16, 2018.

The Federal OSCs, Mike McAteer and Randy Guidry conducted a final site walk on June 19/20, 2018. During the final site walk through the OSC met with the representatives from Karchmer Pipe and Steel Company. Based on the observations made by the OSCs and discussions with the Karchmer representatives, the OSCs deemed the Phase II RP removal activities to be completed.

Planned Removal Actions

No further Planned Removal Actions to be undertaken by the RP, RP contractors, and the EPA.

Next Steps

START will prepare and submit the Phase II Removal Report.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
asbestos contaminated soil	52,045 tons		Waste Connections, Oklahoma City, OK

response.epa.gov/henleyasbestos