

**United States Environmental Protection Agency**  
**Region IV**  
**POLLUTION REPORT**

**Date:** Wednesday, February 6, 2002

**From:** Brook Bass

**To:** Fazi Sherkat, KYDEP

**Subject:** Initial POLREP

W.R. Grace - Wilder, KY  
112 North St., Wilder, KY

<b>POLREP No.:</b>	1	<b>Site #:</b>	A47K
<b>Reporting Period:</b>	01/16/2002	<b>D.O. #:</b>	
<b>Start Date:</b>		<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>		<b>Response Type:</b>	
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Assessment
<b>CERCLIS ID #:</b>		<b>Contract #:</b>	
<b>RCRIS ID #:</b>			

#### **Site Description**

The W.R. Grace Site is located in Wilder, Campbell County, Kentucky. W.R. Grace ("Grace") owned and operated a vermiculite ore processing facility at 112 North St. from 1960 until the mid-1990's. Residues from the processing operation were disposed of on the Grace property and an adjoining tract as fill material. The vermiculite ore and the residues contain actinolite and tremolite asbestos fibers. EPA Region 8's experience with the Grace facilities in Libby, Montana demonstrates that exposure to this material represents a significant threat to human health.

In January 2000, Grace notified Kentucky Department of Environmental Protection (KYDEP) of the environmental conditions at the site. Grace submitted plans to KYDEP to construct a cap on areas where the presence of asbestos-containing material in soil (ACM) had been documented through a previous site investigation. KYDEP approved Grace's conceptual plans to cap these areas. However, Grace informed KYDEP in September 2001 that the Chapter 11 bankruptcy filing prohibited Grace from performing any further remedial activities at the site. In January 2002, KYDEP referred the site to ERRB for consideration as a time-critical removal action.

#### **Current Activities**

The following actions were taken during the period of record:

On January 16, 2002, the OSC and a KYDEP representative met with the owners of the two parcels which comprise the site. The OSC conducted a removal site evaluation pursuant to Section 300.410 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The OSC observed the following conditions which meet criteria established in Section 300.415 of the NCP for determining whether a removal action is appropriate:

1. 300.415(b)(2)(i) "Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants"

Visual evidence of ACM in surface soil at various locations onsite. (Asbestos is a listed hazardous substance). Observed conditions are correlated with analytical results produced by Grace which indicated concentrations as high as 18% asbestos in soil at the site. The site is not fenced or otherwise secure to prohibit access by trespassers. Documented evidence that areas of the site have been used by ATVs in the past.

2. 300.415(b)(2)(iv) "High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate."

Analytical results reveal that ACM has been transported via soil erosion to a drainage ditch, creating a potential for further migration to off-site locations.

#### **Next Steps**

Based on the removal site evaluation, the W.R. Grace - Wilder Site should be assigned a high priority for conducting a time-critical removal action to stabilize site conditions and prevent potential exposure to ACM in soil.

[response.epa.gov/vrgracewilderky](http://response.epa.gov/vrgracewilderky)