

# **VERMONT ASBESTOS GROUP MINE SITE**

## **REMOVAL ACTION II ADMINISTRATIVE RECORD INDEX**

Compiled: September 2015  
Released: September 2015

Prepared by:  
EPA New England  
Office of Site Remediation & Restoration

## INTRODUCTION

This document is the Index to the Administrative Record File for the second Vermont Asbestos Group Mine Site Removal Action. The Index cites site-specific documents and guidance documents used by U.S. Environmental Protection Agency (EPA) staff in selecting a removal action at the Site.

*The following synopsis had been prepared prior to site mobilization and was based on the documents included in the Administrative Record File. However, site conditions were different than expected, and the actions eventually taken did vary from the proposed actions (e.g. demolition of the storage barn was not necessary).*

*All site work has been documented in an After Action Report, which has been added as an amendment to this file.*

The proposed actions at the site include the controlled demolition of the dry ore storage building and subsequent handling of the asbestos ore within. A majority of the asbestos ore within the building is anticipated to be below grade and will not be removed.

The ore that is above grade will be removed with heavy machinery as the building around it is being slowly deconstructed. It is anticipated that the removed ore will be placed in a “cell” to be excavated in the tailings within close proximity to the building. Sufficient cover material to prevent off-site migration will then be placed over the ore. This cover could include the addition of soil amendments that will allow for sustainable vegetation, which in turn stabilizes the ground surface, maintaining the ore in place.

The ore currently believed to remain below grade within the structure will be contained within the confines of the remaining foundation and covered to prevent migration. It is anticipated that the building debris will also be contained on site within a vegetative covered cell, although any salvageable steel will be decontaminated and segregated. Attempts will be made to sell this steel for scrap value, which will be put back into the project and used to reduce total removal action costs.

As the structure is dismantled and ore is moved, water misting will be utilized as necessary to keep the asbestos ore from becoming airborne and leaving the site boundary.

Additional activities include:

- The development of the Scope of Work and Health & Safety Plans.
- The construction of a decontamination pad for on-site vehicles.
- The institution of an air monitoring program, for both personnel and perimeter monitoring.
- The procurement and placement of work trailer(s) complete with utilities.
- The setup of a decontamination zone and contamination reduction corridor for any workers within the hot zone.
- In consultation with the State Historical Preservation Office (SHPO), the documentation of the building in its current condition and its demolition per the SHPO's protocol. This activity may require a specialized subcontractor.

It is anticipated that there will be a site security service in place due to a requirement in a previous Consent Decree (CD) between EPA and the Potentially Responsible Party (PRP). This security, however, may not be sufficient for the removal action where additional security measures may be required.

The Administrative Record File is available for public review, by appointment, at the U.S. EPA Records Center, 5 Post Office Square, Suite 100, Boston, Massachusetts, 02109-3912, by appointment; and at the Town of Lowell Office, c/o Karen Clinger, Town Clerk, 2170 VT RT 100, Lowell, Vermont, 05847; and the Town of Eden Office, c/o Candace Vear, Town Clerk, 71 Old Schoolhouse Road, Eden Mills, Vermont, 05653. Questions concerning the Administrative Record File should be addressed to Gary Lipson, EPA On-Scene Coordinator.

The Administrative Record File is required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9613 (k), and EPA's implementing regulations, 40 CFR § 300.800.-825.

**Please refer to the enclosed Action Memorandum for additional site details.**

AR Collection 63201  
Removal AR Jan. 2014 Revision  
AR Collection Index Report  
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Phase 02: REMOVAL RESPONSE			
542806 ACTION MEMORANDUM - REQUEST FOR A SECOND REMOVAL ACTION			# of Pages: 15 Doc Date: 07/29/2013
Author: , US EPA REGION 1	Addressee:	Doc Type: ACTION MEMORANDUM CORRESPONDENCE DECISION DOCUMENT MEMO	File Break: 02.09 Access Type(s): REL
542811 SITE INVESTIGATION CLOSURE MEMORANDUM			# of Pages: 4 Doc Date: 06/27/2013
Author: , US EPA REGION 1	Addressee:	Doc Type: CORRESPONDENCE DECISION DOCUMENT MEMO	File Break: 02.02 Access Type(s): REL
548027 LETTER REQUESTING US EPA REMOVAL ASSISTANCE FROM THE VERMONT DEPT OF ENVIRONMENTAL CONSERVATION (PHOTOGRAPHS ATTACHED)			# of Pages: 4 Doc Date: 07/02/2013
Author: GEORGE DESCH, VT DEPT OF ENVIRONMENTAL CONSERVATION	Addressee: STANLEY CHIN, US EPA REGION 1	Doc Type: CORRESPONDENCE LETTER	File Break: 02.01 Access Type(s): REL

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Phase 02: REMOVAL RESPONSE			
548028	REMOVAL SITE EVALUATION DOCUMENTS COLLECTED BY US GEOLOGIC SURVEY AND THE VERMONT DEPT OF ENVIRONMENTAL CONSERVATION	# of Pages: 2 Doc Date: 07/01/2007	
Author:	Addressee:	Doc Type: REPORT	File Break: 02.02 Access Type(s): REL
552127	VERMONT ASBESTOS GROUP MINE SITE REMOVAL ACTION 2 REVISED ADMINISTRATIVE RECORD (AR) INDEX	# of Pages: 7 Doc Date: 01/01/2014	
Author: , WESTON SOLUTIONS REGION I START	Addressee: , US EPA REGION 1	Doc Type: ADMIN RECORD (AR) INDEX INDEX	File Break: 02.09 Access Type(s): REL
552128	REMOVAL PROGRAM AFTER ACTION REPORT FOR THE VERMONT ASBESTOS GROUP MINE SITE, EDEN AND LOWELL, ORLEANS AND LAMOILLE COUNTIES 09/23/2013 THROUGH 10/17/2013	# of Pages: 35 Doc Date: 01/01/2014	
Author: , WESTON SOLUTIONS INC START III	Addressee: , US EPA REGION 1	Doc Type: REPORT	File Break: 02.05 Access Type(s): REL

Phase 13: COMMUNITY RELATIONS

548029      PRESS RELEASE - ADMINISTRATIVE RECORD FILE AVAILABLE FOR THE VERMONT ASBESTOS GROUP MINE SITE REMOVAL ACTION 2      # of Pages: 1  
Doc Date: 01/01/1111

Author: , US EPA REGION 1	Addressee:	Doc Type: PRESS RELEASE PUBLIC INFORMATION	File Break: 13.03 Access Type(s): REL
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Number of Documents in Administrative Record: 7

## **SELECTED KEY GUIDANCE DOCUMENTS**

EPA guidance documents may be reviewed at the U.S. EPA Records Center, 5 Post Office Square, Suite 100, Boston, Massachusetts.

1. Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601 et seq.
2. "National Oil and Hazardous Substances Pollution Contingency Plan," Code of Federal Regulations (Title 40, Part 300) 1990.
3. "Revised Guidance on Compiling Administrative Records for CERCLA Response Actions", U.S. EPA, Office of Site Remediation Enforcement, Office of Superfund Remediation and Technology Innovation, Office of Emergency Management, September 2010.
4. Superfund Amendments and Reauthorization Act of 1986.