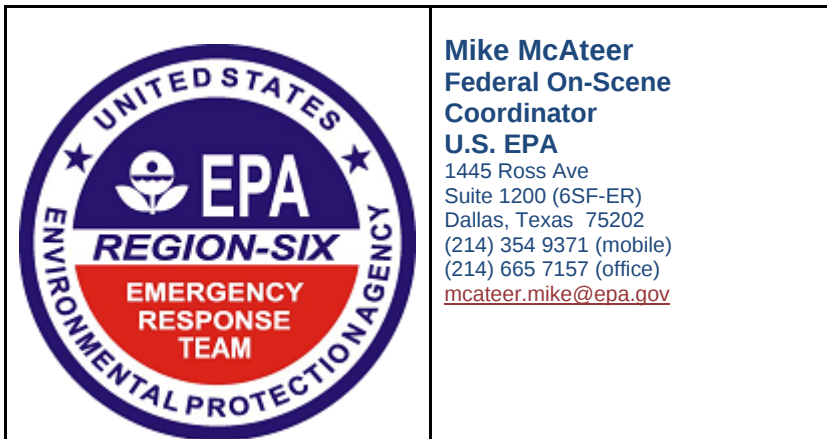

From: McAteer, Mike
Sent: Thursday, June 09, 2016 9:54 AM
To: Martin, Sharon
Subject: RE: Pages containing the incorrect CERCLIS ID - WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

Sharon..... Dee Dee is going to talk to the site attorney (Gloria Moran) and see what she thinks about the option of putting an insert into the documents in SEMS...

Here's my attempt at an insert to any documents placed into SEMS for WR Grace River Road Site (SSID: A604).... I will also forward to Gloria Moran.

This EPA document for the W.R. Grace River Road Site in Jefferson, LA (SSID: A604) incorrectly lists the CERCLIS identification number as LAN000606896. The correct CERCLIS identification number should be LAN000607565. All documents pertaining to the W.R. Grace River Road site should be referenced using the CERCLIS identification number of LAN000607565.



From: Martin, Sharon
Sent: Thursday, June 09, 2016 8:21 AM
To: McAteer, Mike <mcateer.mike@epa.gov>
Cc: Malooly, Tom <Malooly.Tom@epa.gov>; Stanley, Deborah-j <Stanley.Deborah-J@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>
Subject: RE: Pages containing the incorrect CERCLIS ID - WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

Mike,

I didn't hear back from Dee Dee yesterday. I have been going through all of the documents in SEMS that were under CERCLIS ID's LAN000606896 and LAN000607565. I have found a few more so far that will need to be changed and I have found some documents that I don't believe have anything to do with the site at all. At some point I would like to send you a hyperlinked spreadsheet for you to review after we get the AR out and get your guidance on documents we could

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mark for possible deletion in order to clean up SEMS for the WR Grace River Road site. I am moving all of the documents into LAN000607565 and we will inform our folks not to index to LAN000606896. I will be glad to insert your write-up into each document that contains the incorrect CERCLIS ID. Do you think that would be okay from a legal point of view. I am not knowledgeable enough to know if that could possibly cause any problems down the way. If you want to go ahead and write something up and send it to me, I can go ahead and get started inserting them in draft format until we find out if that is acceptable to EPA.

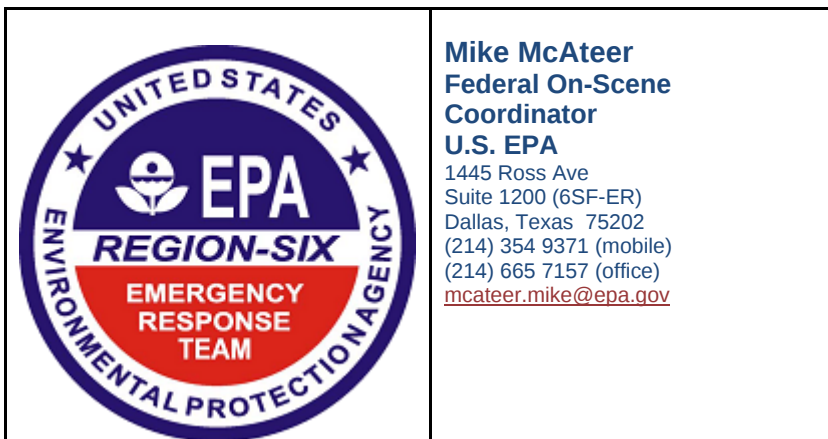
Thanks,
Sharon Martin
Deputy Project Manager | Toeroek Associates, Inc.
phone: 214.665.2126 | mobile: 214.882.0017
email: martin.sharon@epa.gov

From: McAteer, Mike
Sent: Wednesday, June 08, 2016 4:41 PM
To: Martin, Sharon <Martin.Sharon@epa.gov>
Subject: RE: Pages containing the incorrect CERCLIS ID - WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

Sharon:

I never heard from Dee Dee.... I assume you didn't either?

I like your suggestion about a statement being added to the document or the site file that clarifies the CERCLIS number issue.... I can write something up and provide it to you tomorrow.... Will that work for you?



From: Martin, Sharon
Sent: Wednesday, June 08, 2016 10:03 AM
To: McAteer, Mike <mcateer.mike@epa.gov>
Cc: Ortiz, Diana <Ortiz.Diana@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>; Stanley, Deborah-j <Stanley.Deborah-J@epa.gov>
Subject: RE: Pages containing the incorrect CERCLIS ID - WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

Dee Dee/Mike,

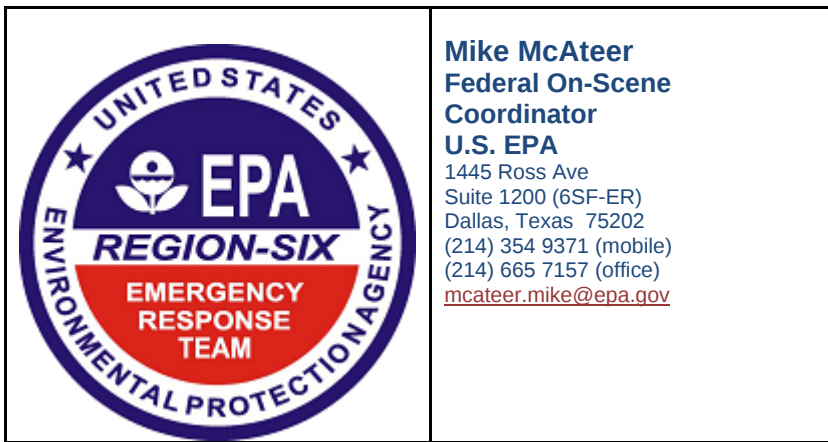
I am available all day. Just let me know when you would like to meet. I was thinking maybe EPA could put together an explanation that we could add to the documents that stated something about the correct CERCLIS ID. It might be easier but you may want to consult with regional counsel to see if that would suffice.

000002

Thanks,
Sharon Martin
Deputy Project Manager | Toeroek Associates, Inc.
phone: 214.665.2126 | mobile: 214.882.0017
email: martin.sharon@epa.gov

From: McAteer, Mike
Sent: Wednesday, June 08, 2016 9:59 AM
To: Martin, Sharon <Martin.Sharon@epa.gov>
Cc: Ortiz, Diana <Ortiz.Diana@epa.gov>
Subject: RE: Pages containing the incorrect CERCLIS ID - WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00
WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

Do you both have time to do a short meeting about this issue? I am hoping to find an easy way to resolve the fact that the wrong CERCLIS ID shows up on the documents in SEMS without tasking the START contractor with redoing all the pages....



From: Martin, Sharon
Sent: Wednesday, June 08, 2016 9:19 AM
To: Ortiz, Diana <Ortiz.Diana@epa.gov>; McAteer, Mike <mcateer.mike@epa.gov>
Cc: Hollier, Alice <Hollier.Alice@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>; Horner, Jo <Horner.Jo@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>; Stankosky, Laura <stankosky.laura@epa.gov>; Ragon, Derek <Ragon.Derek@epa.gov>
Subject: Pages containing the incorrect CERCLIS ID - WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00
WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

Dee Dee,

Page one of the Action Memo, Doc Id 500021659 has the CERCLIS ID LAN000606896 and it should be LAN000607565. Doc Id 500002230 has the CERCLIS ID LAN000606896 on almost every pages of the Removal Assessment Report in the top left corner. It is also in the text of the document and on the maps and figures. It is also present on many pages in the appendices. Maybe the contractor (Dynamac) could do a universal find and replace of the CERCLIS IDs. Those are the only two doc in the AR collection as of today but I will look through the other documents in SEMS and let you all know if they need to be changed also.

Thanks,
Sharon Martin
Deputy Project Manager | Toeroek Associates, Inc.
phone: 214.665.2126 | mobile: 214.882.0017
000003

email: martin.sharon@epa.gov

From: Ortiz, Diana

Sent: Monday, May 09, 2016 3:43 PM

To: McAteer, Mike <mcateer.mike@epa.gov>; Martin, Sharon <Martin.Sharon@epa.gov>

Cc: Hollier, Alice <Hollier.Alice@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>; Horner, Jo <Horner.Jo@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>; Stankosky, Laura <stankosky.laura@epa.gov>; Ragon, Derek <Ragon.Derek@epa.gov>

Subject: RE: ALICE PLEASE ASSIST: FW: Dwayne and Dee Dee Please Assist - WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

All,

WR Grace (A604) is in SEMS with the CERCLIS ID LAN000607565. We cannot take the CERCLIS ID LAN000606896 that is associated with ZONALITE/W.R. Grace and use it for the A604 (WR Grace). We will have to wait for Alice to report back to see with type of financial transactions are associated with A604.

Thanks

Diana Ortiz

Superfund FOIA Coordinator

Information Management Team (6SF-VJ)

(214) 665-7315

From: McAteer, Mike

Sent: Monday, May 09, 2016 3:34 PM

To: Martin, Sharon <Martin.Sharon@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>

Cc: Hollier, Alice <Hollier.Alice@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>; Horner, Jo <Horner.Jo@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>; Stankosky, Laura <stankosky.laura@epa.gov>; Ragon, Derek <Ragon.Derek@epa.gov>

Subject: RE: ALICE PLEASE ASSIST: FW: Dwayne and Dee Dee Please Assist - WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

That's correct.... W.R. Grace River Road.... SSID A604



From: Martin, Sharon

Sent: Monday, May 09, 2016 2:56 PM

To: McAteer, Mike <mcateer.mike@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>

Cc: Hollier, Alice <Hollier.Alice@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>; Horner, Jo <Horner.Jo@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>; Stankosky, Laura <stankosky.laura@epa.gov>; Ragon, Derek <Ragon.Derek@epa.gov>

Subject: RE: ALICE PLEASE ASSIST: FW: Dwayne and Dee Dee Please Assist - WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

Mike,

I just wanted to clarify with you, that you want the name of the site to be WR GRACE RIVER ROAD NOLA, not ZONOLITE/W.R. GRACE. Is that correct?

Thanks,

Sharon Martin

Deputy Project Manager | Toeroek Associates, Inc.

phone: 214.665.2126 | mobile: 214.882.0017

email: martin.sharon@epa.gov

From: McAteer, Mike

Sent: Monday, May 09, 2016 1:46 PM

To: Ortiz, Diana <Ortiz.Diana@epa.gov>

Cc: Hollier, Alice <Hollier.Alice@epa.gov>; Martin, Sharon <Martin.Sharon@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>; Horner, Jo <Horner.Jo@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>; Stankosky, Laura <stankosky.laura@epa.gov>; Ragon, Derek <Ragon.Derek@epa.gov>

Subject: Re: ALICE PLEASE ASSIST: FW: Dwayne and Dee Dee Please Assist - WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

I don't want to delete A604. I just want to associate that SSID with LAN000606896

Sent from my iPhone

On May 9, 2016, at 12:52 PM, Ortiz, Diana <Ortiz.Diana@epa.gov> wrote:

Alice,

Please see the e-mail string below. Mike McAteer has notified us that there should only be one WR Grace in SEMS.

Mike states that the correct site should be WR Grace River Road NOLA, CERCLIS ID LAN000606896, and SSID A604. He state that he would like to have WR Grace (LAN000607565) deleted from SEMS. The SSID **A604** is currently assigned to LAN000607565.

This is what I found in SEMS:

ZONALITE/W.R. GRACE – Metarie, Jefferson Parish, LA - LAN000606896 – No SSID assigned. (this is the site Mike would like to keep)

WR GRACE – Metarie, Jefferson Parish, LA – LAN000607565 – **A604** (site Mike would like to have deleted)

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I am not sure how to go forward with this, is this something you can help with?

Thanks

*Diana Ortiz
Superfund FOIA Coordinator
Information Management Team (6SF-VJ)
(214) 665-7315*

From: Martin, Sharon
Sent: Monday, May 09, 2016 12:22 PM
To: McAteer, Mike <mcateer.mike@epa.gov>; Horner, Jo <Horner.Jo@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>
Cc: Moran, Gloria <Moran.Gloria-Small@epa.gov>; Mitchell, Amanda <Mitchell.Amanda@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>; Stanley, Deborah-j <Stanley.Deborah-J@epa.gov>; Shultz, Kim <Shultz.Kim@epa.gov>
Subject: Dwayne and Dee Dee Please Assist - WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

Mike,

After we reviewed the Zonolite/W.R. Grace and the WR Grace River Road NOLA sites in SEMS-RM and site management, you determined that the correct site name, CERCLIS and SSID should be **WR Grace River Road NOLA, CERCLIS ID LAN000606896, and SSID A604**. There should only be one WR Grace site in Metairie, LA, Jefferson Parish. You would like to have the site corrected in Site Management and SEMS-RM to reflect the correct name, CERCLIS ID and SSID listed above. CERCLIS ID LAN000607565 should not be used and all documents in SEMS for LAN000607565 and LAN000606896 should be merged into CERCLIS ID LAN000606896.

You also instructed Toeroek to use the redacted version of the Removal Assessment reports dated May 3, 2016 in the administrative records for the WR Grace River Road NOLA Site and the Southern Mineralite Site.

Dwayne/Dee Dee,

Can you please assist Mr. McAteer in correcting the Zonolite/W.R. Grace and the WR Grace River Road NOLA site merged together to become **WR Grace River Road NOLA, CERCLIS ID LAN000606896, and SSID A604**. Please advise if there is anything I can do assist in this matter.

Thanks,
Sharon Martin
Deputy Project Manager | Toeroek Associates, Inc.
phone: 214.665.2126 | mobile: 214.882.0017
email: martin.sharon@epa.gov

From: Martin, Sharon
Sent: Thursday, May 05, 2016 4:25 PM
To: McAteer, Mike <mcateer.mike@epa.gov>; Horner, Jo <Horner.Jo@epa.gov>

000006

Cc: Moran, Gloria <Moran.Gloria-Small@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>; Mitchell, Amanda <Mitchell.Amanda@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>; Stanley, Deborah-j <Stanley.Deborah-J@epa.gov>
Subject: RE: WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road and WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

Hi Mike,

Southern Mineralite:

Sorry for the confusion. The previous email was concerning Southern Mineralite. In SEMS the doc id for the non-redacted Removal Assessment report is 500001524 and it has a total of 3,791 pages. The redacted version on the Dynamac CD I received from Jo only has 1,960 pages. If you could possibly look at Doc Id 500001524, the version in SEMS tomorrow and see if the extra pages should or should not have been included with the Removal Assessment Report.

Grace River Road:

I started working on the Grace River Road site redacted version and need some clarification it as well. In SEMS we have non-redacted Removal Assessment Report Doc Id 500002230 containing 4,456 pages. There is also a redacted version of the Grace River Road site in SEMS. It is Doc Id 9534203. I believe this version was created in response to a FOIA. It also contains 4,456 pages. The redacted version on the Dynamac CD I got from Jo only has 1,688 pages. I have not had time to go page by page to see the differences in these documents yet but I will do that next week.

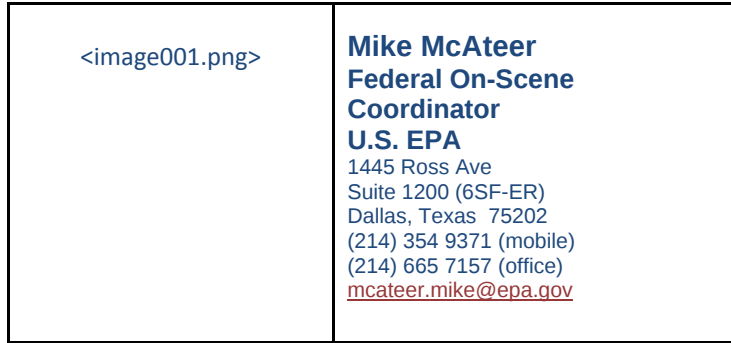
Also, I found the Grace River Road in the wrong site in SEMS. It was mistakenly put in WR Grace River Road Nola (LAN000607565) SSID A604 and not in the Zonolite/W.R. Grace site (LAN000606896) no SSID. Page 6 of the Removal Assessment report list the LAN000606896 CERCLIS ID, but the title page of the report says WR Grace River Road. I just wanted to make sure that we are working on the Zonolite/W.R. Grace site (LAN000606896).

So sorry for the confusion. There are two WR Grace sites in Metairie, LA in SEMS and the names sometimes seem to get confused. I wanted to make sure we are on the right page. I will be working limited hours tomorrow. Please feel free to call my mobile number listed if you can't reach me at the office. Also, when we receive reports on CDs from the Start contractors, they are usually in multiple files/pieces on the CD and we often have to try to convert the non-pdf pieces to pdf and then we do our best to combine the document as it was intended to be viewed. Sometimes, it is difficult to discern if all of the pieces on the CD were meant to be in the actual report or if they were just documentation intended for the site team. Our SOP is to convert everything on the CD to PDF and combine into the report unless we are told specifically do otherwise.

Thanks,
Sharon Martin
Deputy Project Manager | Toeroek Associates, Inc.
phone: 214.665.2126 | mobile: 214.882.0017
email: martin.sharon@epa.gov

From: McAteer, Mike
Sent: Thursday, May 05, 2016 1:57 PM
To: Martin, Sharon <Martin.Sharon@epa.gov>; Horner, Jo <Horner.Jo@epa.gov>
Cc: Moran, Gloria <Moran.Gloria-Small@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>; Mitchell, Amanda <Mitchell.Amanda@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>; Stanley, Deborah-j <Stanley.Deborah-J@epa.gov>
Subject: RE: WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road

Sharon.... I'm in my 8 hour health/safety refresher training right now but, will call you as soon as I get done here



From: Martin, Sharon

Sent: Thursday, May 05, 2016 1:50 PM

To: McAteer, Mike <mcateer.mike@epa.gov>; Horner, Jo <Horner.Jo@epa.gov>

Cc: Moran, Gloria <Moran.Gloria-Small@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>; Mitchell, Amanda <Mitchell.Amanda@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>; Stanley, Deborah-j <Stanley.Deborah-J@epa.gov>

Subject: RE: WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road

Good Afternoon Mr. McAteer,

This is a follow-up to the voicemail I left you earlier today. I am processing the redacted version of the Removal Assessment report for Southern Mineralite. The original version of the document (non-redacted) contains 3,791 pages and the redacted version on the Dynamac CD only has 1,960 pages. In the redacted version, everything past page 1,960 is missing. Do I need to create a target sheet for those pages or should I add the pages that are missing to the redacted version? Please advise.

Thanks,

Sharon Martin

Deputy Project Manager | Toeroek Associates, Inc.

phone: 214.665.2126 | mobile: 214.882.0017

email: martin.sharon@epa.gov

From: McAteer, Mike

Sent: Monday, April 25, 2016 7:35 PM

To: Martin, Sharon <Martin.Sharon@epa.gov>; Horner, Jo <Horner.Jo@epa.gov>

Cc: Moran, Gloria <Moran.Gloria-Small@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>; Mitchell, Amanda <Mitchell.Amanda@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>; Stanley, Deborah-j <Stanley.Deborah-J@epa.gov>

Subject: RE: WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road

Hi Sharon.... Can you please provide me with a copy of the AR index for both the River Road Site and Southern Mineralite Site.... I will look it over and figure out if everything we need is on the list.

Thanks.



000008

	U.S. EPA 1445 Ross Ave Suite 1200 (6SF-PE) Dallas, Texas 75202 (214) 354 9371 (mobile) (214) 665 7157 (office) mcateer.mike@epa.gov
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From: Martin, Sharon
Sent: Monday, April 25, 2016 4:44 PM
To: Horner, Jo
Cc: McAteer, Mike; Moran, Gloria; Ortiz, Diana; Patrick, Dwayne; Mitchell, Amanda; Malooly, Tom; Stanley, Deborah-j
Subject: WRF EP-W-10-011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road

Hi Jo,

Please let me know when you complete building the collection and if there is anything I can do to assist you.

Thanks,
Sharon Martin
Deputy Project Manager | Toeroek Associates, Inc.
phone: 214.665.2126 | mobile: 214.882.0017
email: martin.sharon@epa.gov

From: Martin, Sharon
Sent: Monday, April 25, 2016 4:41 PM
To: Horner, Jo <Horner.Jo@epa.gov>
Cc: McAteer, Mike <mcateer.mike@epa.gov>; Moran, Gloria <Moran.Gloria-Small@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>; Mitchell, Amanda <Mitchell.Amanda@epa.gov>; Patrick, Dwayne <patrick.dwayne@epa.gov>; Malooly, Tom <Malooly.Tom@epa.gov>
Subject: WRF EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite

Jo,

I wanted to check with you and see where you are with this AR. Have you completed a collection for the AR? Will there be additional documents? Please let me know what if you need any assistance.

Thanks,
Sharon Martin
Deputy Project Manager | Toeroek Associates, Inc.
phone: 214.665.2126 | mobile: 214.882.0017
email: martin.sharon@epa.gov

From: Martin, Sharon
Sent: Monday, April 25, 2016 3:02 PM
To: Malooly, Tom <Malooly.Tom@epa.gov>; Patrick, Dwayne <Patrick.Dwayne@epa.gov>; Stanley, Deborah-j <Stanley.Deborah-J@epa.gov>
Cc: Horner, Jo <Horner.Jo@epa.gov>; McAteer, Mike <mcateer.mike@epa.gov>; Moran, Gloria <Moran.Gloria-Small@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>; Mitchell, Amanda <Mitchell.Amanda@epa.gov>
Subject: EP-W-10-011_06_MM_C100_A6AC/OU00_02_00094.00 - Southern Mineralite and EP-W-10-

011_06_MA_C100_A604/OU00_02_00091.00 WRGrace River Road RE: Draft WRF - FW: Grace River Road Action Memo and Southern Mineralite Action Memo

Dwayne,

We opened a WRF for the Southern Mineralite AR on 06/04/2015 and have been waiting for the Action Memo to be signed and also for WR Grace River Road - Zonolite / WR Grace Exfoliation Facility on 06/04/2015. I will contact Jo and see what she needs from me at this time.

Thanks,

Sharon Martin
Deputy Project Manager | Toeroek Associates, Inc.
phone: 214.665.2126 | mobile: 214.882.0017
email: martin.sharon@epa.gov

From: Malooly, Tom

Sent: Monday, April 25, 2016 2:49 PM

To: Patrick, Dwayne <Patrick.Dwayne@epa.gov>; Martin, Sharon <Martin.Sharon@epa.gov>; Stanley, Deborah-j <Stanley.Deborah-J@epa.gov>

Cc: Horner, Jo <Horner.Jo@epa.gov>; McAteer, Mike <mcateer.mike@epa.gov>; Moran, Gloria <Moran.Gloria-Small@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>; Mitchell, Amanda <Mitchell.Amanda@epa.gov>

Subject: RE: Draft WRF - FW: Grace River Road Action Memo and Southern Mineralite Action Memo

Thank you Dwayne!

Tom Malooly
Project Manager
Toeroek Associates Inc.
c/o USEPA Region 6 (6SF-VI)
1445 Ross Avenue
Suite 1200
Dallas, Texas 75202
214-665-6781
malooly.tom@epa.gov
tmalooly@toeroek.com

From: Patrick, Dwayne

Sent: Monday, April 25, 2016 2:41 PM

To: Malooly, Tom <Malooly.Tom@epa.gov>; Martin, Sharon <Martin.Sharon@epa.gov>; Stanley, Deborah-j <Stanley.Deborah-J@epa.gov>

Cc: Horner, Jo <Horner.Jo@epa.gov>; McAteer, Mike <mcateer.mike@epa.gov>; Moran, Gloria <Moran.Gloria-Small@epa.gov>; Ortiz, Diana <Ortiz.Diana@epa.gov>

Subject: Draft WRF - FW: Grace River Road Action Memo and Southern Mineralite Action Memo

ESS,

Please prepare a draft WRF for this project and work with site team to complete.

Very respectfully,

000010

Dwayne Patrick

Management Analyst/Veteran Advocate
Information Management Team
U.S. EPA, Region 6, Superfund Division
214-665-6582
<image003.jpg> <image004.jpg>

From: Horner, Jo

Sent: Thursday, April 21, 2016 3:55 PM

To: Patrick, Dwayne <Patrick.Dwayne@epa.gov>

Subject: Grace River Road Action Memo and Southern Mineralite Action Memo

Dwayne,

The Grace River Road Action Memo and the Southern Mineralite Action Memo were signed effective 4/21/16. I am requesting the assistance of the Toeroek contractors to complete the Administrative Record.

The OSC on both sites is Mike McAteer. The site attorney for both is Gloria Moran.

Thank you.

Jo Horner

Jo Horner
Superfund Prevention and Response Branch
6SF/SEE
214-665-7366 (office phone)
horner.jo@epa.gov

<image005.gif>

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<image006.jpg> <image007.jpg>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS TEXAS 75202-2733

APR 21 2016

MEMORANDUM

SUBJECT: Request for Approval of a Time-Critical Removal Action at the Grace River Road Site, Jefferson, Jefferson Parish, Louisiana

FROM: Mike McAteer, On-Scene Coordinator *m. McAteer*
Readiness and Emergency Response Team (6SF-ER)

TO: Carl E. Edlund, P.E., Director
Superfund Division (6SF)

THRU: *for* Ronnie D. Crossland, Branch Chief *J. Chris Petersen*
Emergency Management Branch (6SF-E)

I. PURPOSE

This memorandum documents the approval for a Removal Action to mitigate the release and threatened release of hazardous substances, pollutants and/or contaminants pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. §§9601 *et seq.*, at the Grace River Road Site ("Site"), located in Jefferson, Jefferson Parish, Louisiana. The action includes the removal and offsite disposal of approximately 2,115 tons of asbestos-contaminated soil as well as the abatement of asbestos of one area inside the former exfoliation building onsite. The breakdown of excavated soil by Area is listed below:

- Area B: 1335 tons (two grids); and
- Area D: 780 tons (two grids)

This action meets the criteria for initiating a removal action under the National Contingency Plan (NCP), 40 CFR §300.415. This action will require less than twelve months and \$2,000,000 total to complete and is expected to be conducted by the Responsible Party.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS # LAN000606896

Category of Removal: Classic Emergency

Site ID #A6O4

Latitude: 29° 56'59.58" N Longitude: 90° 10'21.16" W

Documentation of Approval of a Removal Action at the Grace River Road Site.

A. Site Description

The former W. R. Grace River Road (WRGRR) facility is located at 4729 River Road in the town of Jefferson, Jefferson Parish, Louisiana. The site consists of a 16,000 square-foot building situated on approximately 2 acres of land. A concrete pad surrounded by grass on the north side of the building was the former location for several metal storage silos for the facility. An abandoned railroad spur, overgrown with vegetation, runs northward from the northwest side of the property. The east side of the building consists of a concrete loading dock and a parking lot. A chain link fence encloses a portion of a grass-covered area of the property along the west side of the building. A small area in front of the building fronting River Road is both partially vegetated with grass and paved with concrete.

The site is bordered to the north and west by other commercial and industrial properties; to the east by Boyce Street; and to the south by River Road. The Mississippi River is located approximately 1,000 feet to the south of the site. Current land use surrounding the site is primarily commercial-industrial, while a residential area is located northeast of the site. The closest residential properties are located approximately 300 feet northeast of the site. This residential area (known as Jefferson Heights) is visible in aerial photographs dating back to 1969. According to the United States Census Bureau (USCB) 2000 census data, more than 75% of the homes in this northeast residential area were constructed before 1969. The 1990 U.S. census reported that 5,047 people lived within 1 mile of the facility when it was exfoliating vermiculite. For purposes of the Removal Assessment, the properties sampled were divided into Areas. The following is a brief summary of each area:

- Area A consists of the former W. R. Grace/Zonolite Site now known as WRGRR property;
- Area B consists of commercial property located to the east of the WRGRR site. The physical address of the property is 4709 River Road. The property is owned by Albert Mintz, et al., managed by Deckbar Realty and operated by commercial entities;
- Area C consists of residential properties located northeast of the WRGRR site and are located on Jefferson Heights Avenue; and
- Area D consists of the inactive railroad spur owned by the New Orleans Public Belt Railroad and located approximately 150 feet northwest of the WRGRR site.

1. Removal Site Evaluation

In November 2008, a sit inspection was performed on the site for NPL ranking purposes. The inspection results indicated the site would not score high enough to be ranked on the NPL. The threats posed by the site at that time did not meet the criteria for an immediate action and was given a lower priority.

On November 19, 2013, EPA/START-3 conducted an on-site inspection at the site to determine potential sample locations. During this on-site inspection, EPA/START-3 verified the presence of raw vermiculite ore in two locations on-site. In addition, EPA/START-3 identified off-site sample locations for future sampling activities.

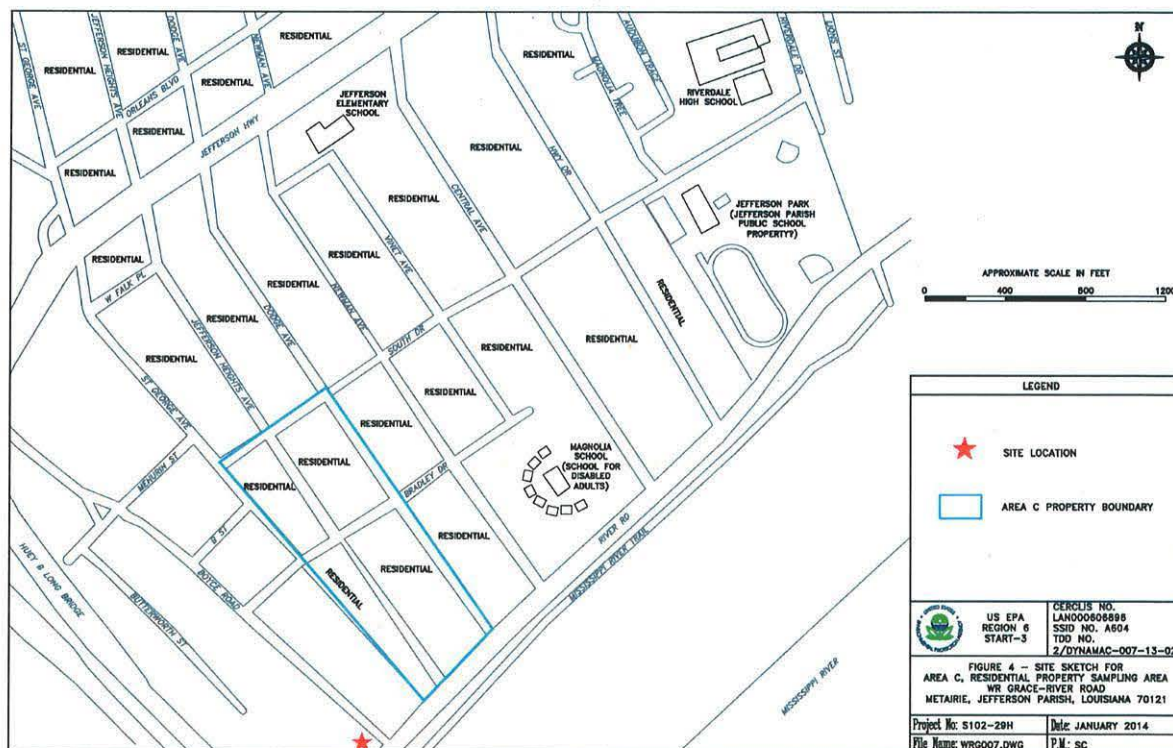
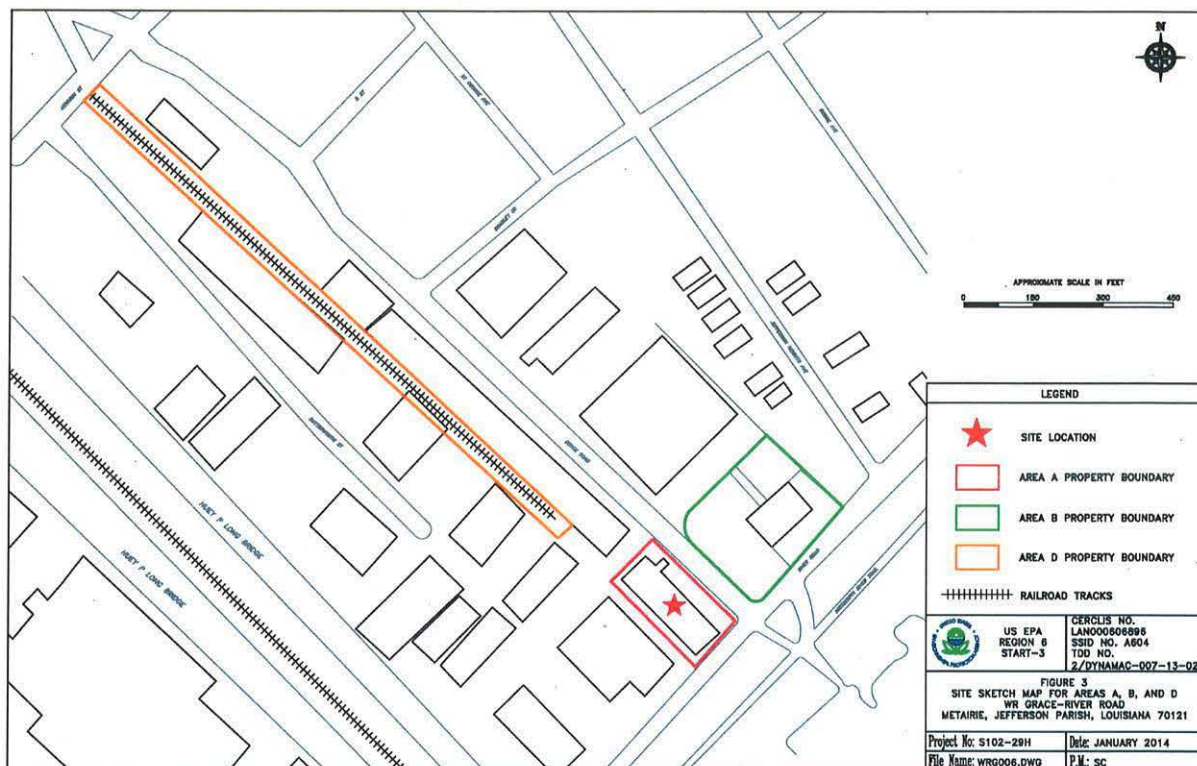
Most recent Removal Assessment sampling activities occurred in four phases. During Phase I, which was conducted between June 17 -19, 2014, indoor dust samples were collected from Area A- On-site building and surface and subsurface soil samples were collected from Areas B – Commercial Vacant Lot, and Area C – Residential Properties located in Jefferson Heights Subdivision. During Phase II, which was conducted between July 10 – 12, 2014, Activity-Based Sampling (ABS) was conducted in Areas A, B, and C. During Phase III, which was conducted on September 11, 2014, surface soil samples were collected from Area D – New Orleans Public Belt (NOPBRC) Railroad Spur Right-of-Way (ROW). Phase IV, which was conducted on October 2, 2014, consisted of ABS sampling in Area D, NOPBRC ROW.

The field assessment sampling activities were conducted to determine the presence of Libby amphibole asbestos (actinolite, edenite, tremolite, winchite and richterite) structures associated with (former) use and processing of vermiculite ore from the Libby, Montana, WR Grace mining operations.

2. Physical Location

The former W. R. Grace River Road facility is located at 4729 River Road in the town of Jefferson, Jefferson Parish, Louisiana. The site consists of a 16,000 square-foot building situated on approximately 2 acres of land. A concrete pad surrounded by grass on the north side of the building was the former location for several metal storage silos for the facility. An abandoned railroad spur, overgrown with vegetation, runs northward from the northwest side of the property. The site is bordered to the north and west by other commercial and industrial properties; to the east by Boyce Street; and to the south by River Road. The Mississippi River is located approximately 1,000 feet to the south of the site. Current land use surrounding the site is primarily commercial-industrial, while a residential area is located northeast of the site. The closest residential properties are located approximately 300 feet northeast of the site.

MAPS OF SITE AREA



PHOTOS OF AREAS OF CONTAMINATION



View of collecting dust sample, WRG-006, which was determined to contain Libby Amphibole
Asbestos



View of collecting soil sample AB-005-01/16, which was determined to contain Libby

Documentation of Approval of a Removal Action at the Grace River Road Site.

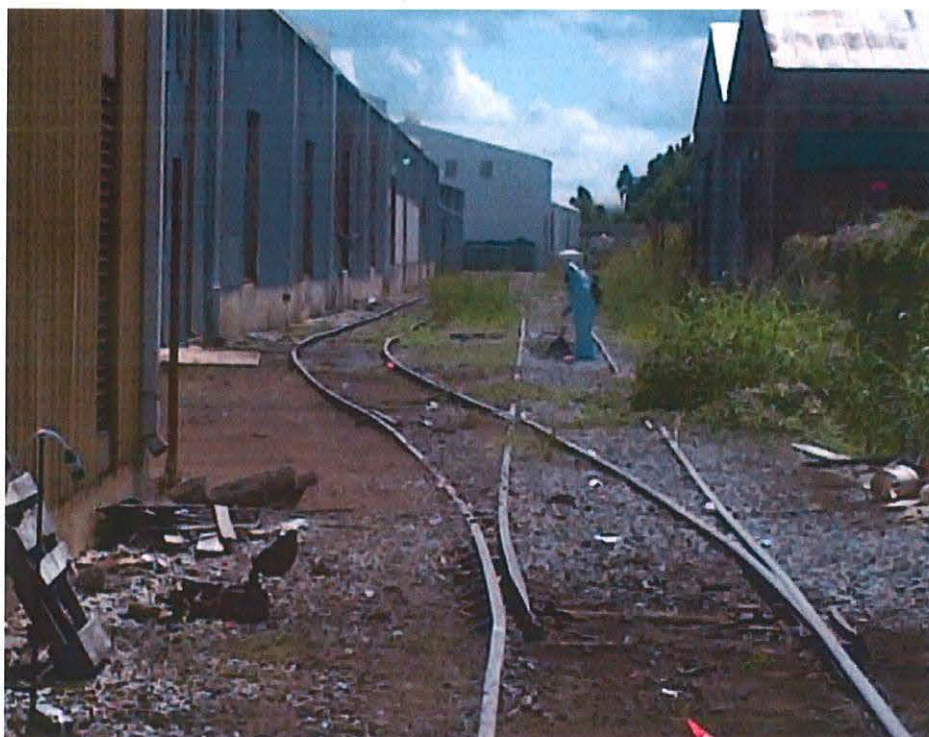
Amphibole Asbestos



View Grid AD-010, which was determined to contain Libby Amphibole Asbestos.



View Grid AD-010, which was determined to contain Libby Amphibole Asbestos.



View ABS activities in Grid AD-009

3. Site Characteristics

The site was purchased in 1964 by Louis D. Haeuser et al, and is in the care of Deckbar Realty. W. R. Grace leased the site and used the existing 16,000 square-foot building for vermiculite exfoliation operations from 1965 to 1989. According to Agency for Toxic Substances and Disease Registry (ATSDR) reports, upon terminating their lease of the site, W.R. Grace sold some of the vermiculite processing equipment and office equipment to the Deckbar Realty Company, the management company for the property. Among the items left behind or sold to Deckbar Realty Company were the unloading conveyor system for vermiculite, storage silos, the Monokote bag house, the exfoliation furnace, and various material handling elevators and conveyors.

The facility has been leased to other businesses since 1989 which have included a clothing wholesale company, a printing business, a marine insulation company which used adhesives, and a cardboard storage facility.

Vermiculite exfoliation occurred on-site from 1965 to 1989. Vermiculite was transported into the site by rail lines located immediately northwest of the site. Exfoliation operations occurred in the warehouse. The ATSDR reported that the available invoice data indicated that the facility received approximately 148,000 tons of vermiculite from 1966 to 1988. During that period, the facility produced attic insulation, masonry insulation, lightweight concrete aggregate, spray-applied fireproofing, and various horticultural soil conditioners.

The Monokote brand of spray-applied fireproofing was produced at the facility until 1976. The Monokote 3 (MK-3) product, discontinued at all W.R. Grace facilities in 1973, was formulated with 10% to 19% chrysotile as an additive. Subsequent formulations of Monokote, MK-4 and MK-5, were produced at the facility without the addition of chrysotile. The equipment that was used for the vermiculite exfoliating was reported to have been dismantled in the 1980s. The silos used to store the raw vermiculite ore, located on the north side of the building were reported to have been removed around 2002-2003.

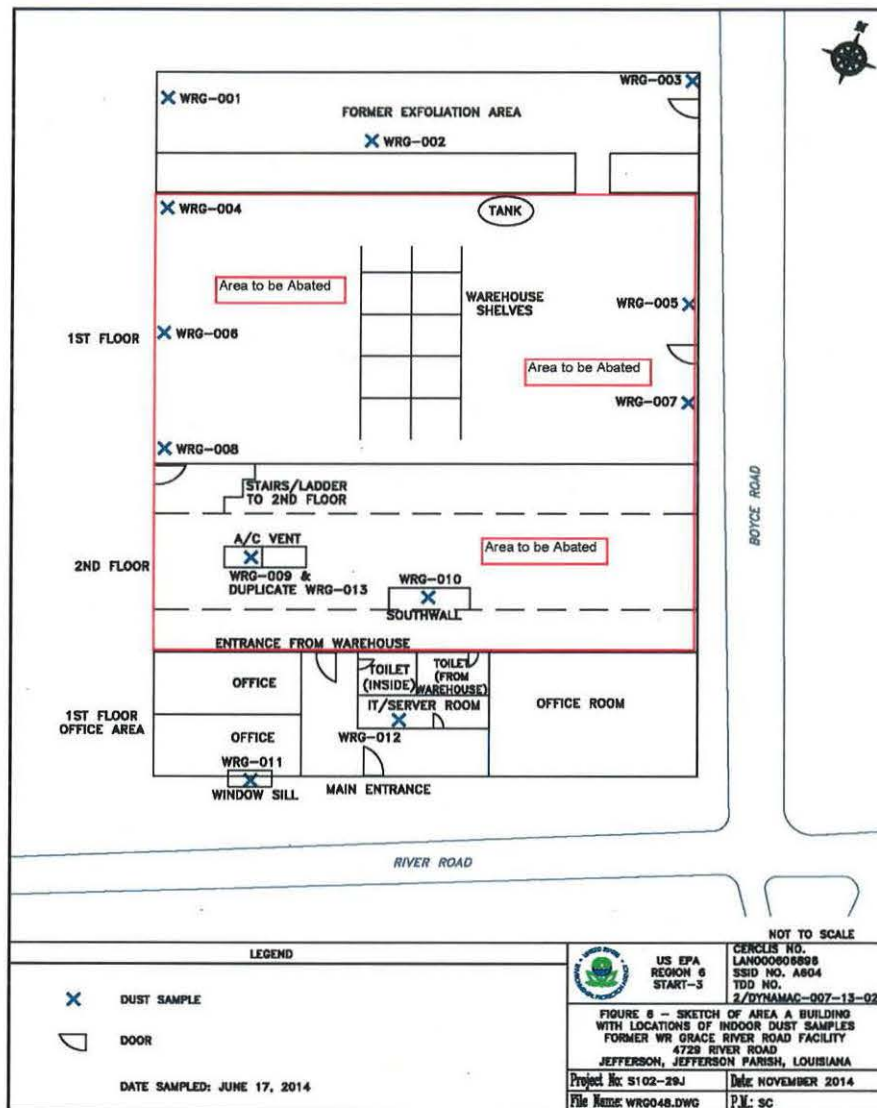
Operations after 1989, as previously mentioned, included a marine insulation company, a clothing wholesale operation, and a printing business (Wholesale Printables). These tenants have used the property since 2003. After WR Grace/Zonolite vacated the premises in 1989, a marine insulation company that used adhesives occupied the building.

The front (southern) warehouse unit, as of November 2008, was leased to a printing company to store cardboard boxes for packaging and shipping. The rear (northern) unit of the warehouse facility was vacant but planned for future occupancy.

The only document filed with the Louisiana Department of Environmental Quality (LDEQ) Electronic Document Management System (EDMS) regarding the site was an e-mail dated from 2005, which stated W.R. Grace had not operated at the site for over ten years prior. No information regarding operational history was found on file with the LDEQ EDMS.

4. Releases or threatened release into the environment of a hazardous substance, pollutant or contaminant

Asbestos is a hazardous substance as defined by 40.C.F.R. Section 302.4 of the NCP and Section 101 (14) of CERCLA, (42 U.S.C. Section 9601(14)). Soil sampling data from assessment activities shows Libby asbestos contamination in two grids associated with Area B and two grids associated with Area D (see map below of grids to be excavated) at depths to 6 inches below ground surface (bgs). Levels of asbestos ranged between 0.25% and 1.5% in the contaminated grids. Dust samples collected from inside the warehouse where the former vermiculite exfoliation process took place also showed elevated levels of both Libby amphibole asbestos and chrysotile asbestos. These dust samples ranged in concentration from Not Detected to 150,000 structures per square centimeters.



Map of Indoor Dust Sample Locations and Location of Abatement Area



Map of Grids to be Excavated (Orange) in Area B – Commercial Vacant Lot



Map of Grids to be Excavated (Orange) in Area D – NOPBRC Railroad Spur ROW

5. NPL Status:

The Site is not on the NPL list and is not likely to be included.

6. Maps, Pictures and other graphic representations

Attachment 1 ATSDR Public Health Statement for Asbestos

Attachment 2 OSHA Fact Sheet on Asbestos

Attachment 3 Enforcement Addendum (Confidential/FOIA Exempt)

B. State and Local Authorities' Roles

1. State and Local Actions to Date

In discussions with the Louisiana Department of Environmental Quality (LDEQ), they have indicated that they would like EPA to take the lead on addressing this Site. After the completion of this response action any further actions will be referred to LDEQ.

2. Potential for Continued State/Local Response

LDEQ will assist in the cleanup within the limits of its resources.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

Current Site conditions meet the following factors, which indicate that the Site is a threat to the public health, welfare, and the environment, and that a removal action is appropriate under Section 300.415(b)(2) of the National Contingency Plan (NCP), 40 C.F.R. § 300.415(b)(2). Any or all of these factors may be present at a Site, yet any one factor may determine the appropriateness of a removal action under CERCLA authority.

1. Exposure to Human Populations, Animals or the Food Chain, NCP Section 300.415(b)(2)(i)

Asbestos has been detected in surface and near surface soils on the former Grace River Road site at levels in excess of EPA's action level of .25%. Also, elevated concentrations of asbestos were detected in dust samples in excess of EPA's action level of 5,000 s/sc inside parts of the current onsite warehouse that previously housed the vermiculite exfoliation equipment. All of the areas of contaminated soil are unfenced and the public therefore has uninhibited access to these areas of contamination. The areas of contaminated soil are located on commercially zoned properties and therefore future commercial development of the properties may occur. Any current or future use of the

contaminated properties can easily disturb this contaminated soil by way of routine activities such as walking or digging. The onsite warehouse has historically been occupied by workers who could have been exposed to the areas of the warehouse where elevated areas of asbestos contaminated dust have been detected. The warehouse is currently unoccupied however, the owner recently (January 2016) stated to EPA that he wants to re-lease the property as soon as possible.

Airborne exposure to asbestos may occur through the release of asbestos fibers from contaminated soils and indoor dust. Asbestos fibers may be dispersed by the motion of the routine site activities. Effects on the lung are a major health concern from asbestos, as chronic (long-term) exposure to asbestos in humans via inhalation can result in a lung disease termed asbestosis. A large number of occupational studies have reported that exposure to asbestos via inhalation can cause lung cancer and mesothelioma (a rare cancer of the membranes lining the abdominal cavity and surrounding internal organs).

The routine use and disturbance of the contaminated soils at the site as well as daily use of the warehouse greatly increases the potential for exposure to human populations.

2. Contaminants in Soils, NCP Section 300.415(b)(2)(iv)

Sample results indicate the presence of asbestos at levels in excess of EPA's action level of .25% in both the surface and subsurface soils. Analytical results of soil samples indicate the presence of asbestos in surface soils with concentrations as high as 1.5%.

3. Weather Conditions That May Cause the Release or Migration of Hazardous Substances, NCP Section 300.415 (b)(2)(v)

Jefferson, Louisiana (a suburb of New Orleans) is located in a humid subtropical climate zone with short mild winters and long hot, humid summers. The city receives abundant rainfall (approximately 62+ inches annually) distributed almost evenly throughout the year. Heavy rain events could cause runoff to carry contaminants in the surface soils to offsite locations.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances, pollutants or contaminants from this Site, if not addressed by implementing the response action in this Action Memorandum, may present an imminent and substantial endangerment to the public health, welfare, or the environment.

V. ACTIONS AND ESTIMATED COSTS

A Proposed Actions

1. Proposed Action Description

To mitigate the threat to the public health posed by the asbestos present in soils at the Site, the proposed removal actions are outlined below. The removal will involve the following:

- a. As necessary, continue to assess and characterize threats posed by the Site including sampling of soils and air (ABS) for asbestos contamination in both onsite and offsite areas.
- b. As necessary, implement security measures such as fencing, gates, locks, or guards to limit access to the areas of contamination.
- c. Excavate and remove asbestos-contaminated soils. The excavation depth will be up to two feet below grade.
- d. Complete asbestos abatement of those areas inside the onsite warehouse where elevated levels of asbestos-contaminated dust was detected.
- e. Fill all excavated areas with clean fill material using an approved compaction method.
- f. Dispose of contaminated soils excavated pursuant to subparagraph b. above at an EPA-approved offsite disposal facility in accordance with Section 121(d)(3) of CERCLA and 40 CFR 300.440, and transport all waste materials in accordance with Department of Transportation rules and regulations.
- g. Suppress dust and control erosion during the removal action.
- h. Monitor and sample as necessary personal and ambient air during removal activities.
- i. Restore the surface features to pre-existing conditions as appropriate.
- j. If necessary, coordinate with the current owner of the Site property and with the appropriate State and local authorities for implementation of institutional controls where any contamination remains above EPA's action levels (i.e, soils at depth or below physical containment).
- k. Requirements under the Occupational Safety and Health Act (OSHA) of 1970, 29 U.S.C. § 651 et seq., and under the laws of a State with an approved equivalent worker safety program, as well as other applicable safety and health requirements,

will be followed. Federal OSHA requirements include, among other things, Hazardous Materials Operation, 29 C.F.R. Part 1910, as amended by 54 Fed. Reg. 9317 (March 1989), all OSHA General Industry (29 C.F.R. Part 1910) and Construction (29 C.F.R. Part 1926) standards wherever they are relevant, as well as OSHA record keeping and reporting regulations, and the EPA regulations set forth in 40 C.F.R. Part 300 relating to the conduct of work at Superfund sites. Specific Federal OSHA requirements for asbestos include 29 C.F.R. 1910.1001, which applies to all occupational exposures to asbestos in all industries covered by the Act except as otherwise specified.

2 Contribution to remedial performance

It is anticipated that no remedial action will take place at the Site. If any remedial action should occur the completed removal action is consistent with the remedial action as it removes the source of the contamination.

3 Description of alternative technologies

Removal of the contaminated soil and abatement of the indoor dust along with proper disposal is the viable option.

4 Applicable or relevant and appropriate requirements (ARAR)

The proposed removal action will be conducted to eliminate the actual or potential exposure to hazardous substances, pollutants or contaminants pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. S 9601 et seq. in a manner consistent with the National Contingency Plan, 40 CFR Part 300, as required at 33 U.S.C. § 1321(c)(2) and 42 U.S.C. § 9605. As per 40 CFR Section 300.415(j), fund-financed removal actions under CERCLA § 104 and § 106 shall, to the extent practicable considering the exigencies of the situation, attain the applicable or relevant and appropriate requirements (ARARS) under Federal environmental law. The following is an analysis of ARARs for this action:

Chemical-specific ARARs - There are no Federal or State ARARs for asbestos contaminated soil. Historically, asbestos has been addressed in the Superfund program by reference to the term asbestos-containing material (ACM), defined in the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 C.F.R. Part 61, as materials containing >1% asbestos.

EPA is basing its removal of the contaminated soil grids on soil sample data that show elevated concentrations of asbestos in soils at levels ranging from trace to 1.5%. EPA is using the soil clean-up level of equal to or greater than .25%. Similarly, the abatement and removal of asbestos dust from the warehouse is based on EPA sample data showing elevated concentrations of asbestos (both Libby and chrysotile fibers), in excess of 5,000 s/sc, in dust samples inside the warehouse.

Location-specific ARARs - All proposed activities at the Site are compliant with any location-specific ARARs including those regarding Cultural Resources. Based on the Agency's knowledge of the Site, no additional cultural resource work is required.

Action-specific ARARs – The proposed Removal Action, which pertains to the excavation of asbestos-containing materials, and transportation and off-site disposal of asbestos, will comply with Federal and State applicable or relevant and appropriate environmental requirements (ARARs) to the extent practicable. Abatement activities inside the warehouse will comply with NESHAP.

To-be-considered (TBCs) - In addition to ARARs, other advisories, criteria, or guidance that may be useful in developing the remedy were, as appropriate, identified and considered.

5. Project Schedule

EPA currently estimates that the total duration of asbestos removal activities will require approximately four weeks. It is important to note that previous EPA experience at other asbestos removal sites has shown that delays frequently occur as a result of high wind conditions. EPA routinely uses water to suppress any dust from migrating away from the excavation areas however, when high wind conditions are experienced, EPA errs on the side of caution and will shut down operations until lower wind speeds return.

B. Estimated Costs

Extramural Costs

Cleanup Contractor (ERRS) (estimated).....	\$313,000.00
START (estimated).....	\$125,000.00

Extramural Subtotal	\$438,000.00
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Extramural Contingency (20%)-----	\$87,600.00
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TOTAL REMOVAL ACTION COST-----	\$525,600.00
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VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If the actions described in this Action Memorandum are not conducted, there would be a continuing potential threat to human health. Asbestos will continue to be exposed on the surface of this property and inside the warehouse. The release of asbestos into the environment may occur from soil disturbances by local residents or future construction crews or workers. Also, workers inside the warehouse will continue to be exposed to elevated asbestos concentrations in dust unless these areas are properly abated. These potential releases pose a significant threat to the local residents and workers who use the property.

VII. OUTSTANDING POLICY ISSUES

Asbestos removal actions for “Libby amphibole” type material have been conducted by EPA at other locations around the country. This removal action does not set a precedent, but, is considered nationally significant based on EPA’s policy regarding CERCLA actions at Asbestos sites. This action is part of an agency wide initiative to investigate vermiculite facilities that received vermiculite ore from the W.R. Grace vermiculite mine in Libby, Montana. Because of the potentially broad impact of the vermiculite ore with high levels of amphibole asbestos mined from the Libby, Montana deposits, EPA Region 6 is coordinating with EPA Headquarters and other Regions to assure a consistent approach to vermiculite issues. There are no outstanding policy issues related to the proposed removal action at this site.

VIII. ENFORCEMENT

The total cost for this emergency removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$897,571.80.

(Direct Cost) + (Other Indirect Costs) + 61.55% (Direct + Indirect Costs) = Estimated EPA Cost

\$525,600.00 + \$ 30,000.00 + 0.6155 (\$525,600.00 + \$30,000) = \$897,571.80

Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rated expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2002. The estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only, and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor the deviation of actual total costs from this estimate will affect the United States’ right to cost recover.

IX. RECOMMENDATION

This Action Memorandum documents the approval of the time-critical removal action to be conducted at the W.R. Grace River Road Site, Jefferson, Jefferson Parish, Louisiana, developed in accordance with CERCLA, 42 U.S.C. § 9601 et seq., and consistent with the NCP, 40 C.F.R. Part 300. This decision is based on the administrative record for the Site.

Conditions at the Site meet the criteria as defined by Section 300.415(b) (2) of the NCP, 40 C.F.R. § 300.415(b) (2), for a removal action. The total project ceiling for the Site as approved by the Superfund Division Director is \$525,600.00.

APPROVED: Sam Phillips Acting DATE: 4/21/16
Carl E. Edlund, P.E., Director
Superfund Division (6SF)

Attachment 1: ATSDR Tox FAQs for Asbestos



ASBESTOS
CAS # 1332-21-4

Division of Toxicology ToxFAQs™

September 2001

This fact sheet answers the most frequently asked health questions (FAQs) about asbestos. For more information, call the ATSDR Information Center at 1-888-422-8737. This fact sheet is one in a series of summaries about hazardous substances and their health effects. It's important you understand this information because this substance may harm you. The effects of exposure to any hazardous substance depend on the dose, the duration, how you are exposed, individual susceptibility and personal habits, and whether other chemicals are present.

HIGHLIGHTS: Exposure to asbestos usually occurs by breathing contaminated air in workplaces that make or use asbestos. Asbestos is also found in the air of buildings that are being torn down or renovated. Asbestos exposure can cause serious lung problems and cancer. This substance has been found at 83 of the 1,585 National Priorities List sites identified by the Environmental Protection Agency (EPA).

What is asbestos?

Asbestos is the name given to a group of six different fibrous minerals (amosite, chrysotile, crocidolite, and the fibrous varieties of tremolite, actinolite, and anthophyllite) that occur naturally in the environment. Asbestos minerals have separable long fibers that are strong and flexible enough to be spun and woven and are heat resistant. Because of these characteristics, asbestos has been used for a wide range of manufactured goods, mostly in building materials (roofing shingles, ceiling and floor tiles, paper products, and asbestos cement products), friction products (automobile clutch, brake, and transmission parts), heat-resistant fabrics, packaging, gaskets, and coatings. Some vermiculite or talc products may contain asbestos.

What happens to asbestos when it enters the environment?

Asbestos fibers can enter the air or water from the breakdown of natural deposits and manufactured asbestos products. Asbestos fibers do not evaporate into air or dissolve in water. Small diameter fibers and particles may remain suspended in the air for a long time and be carried long distances by wind or water before settling down. Larger diameter fibers and particles tend to settle more quickly.

Asbestos fibers are not able to move through soil. Asbestos fibers are generally not broken down to other compounds and will remain virtually unchanged over long periods.

How might I be exposed to asbestos?

We are all exposed to low levels of asbestos in the air we breathe. These levels range from 0.00001 to 0.0001 fibers per milliliter of air and generally are highest in cities and industrial areas.

People working in industries that make or use asbestos products or who are involved in asbestos mining may be exposed to high levels of asbestos. People living near these industries may also be exposed to high levels of asbestos in air.

Asbestos fibers may be released into the air by the disturbance of asbestos-containing material during product use, demolition work, building or home maintenance, repair, and remodeling. In general, exposure may occur only when the asbestos-containing material is disturbed in some way to release particles and fibers into the air.

Drinking water may contain asbestos from natural sources or from asbestos-containing cement pipes.

How can asbestos affect my health?

Asbestos mainly affects the lungs and the membrane that surrounds the lungs. Breathing high levels of asbestos fibers for a long time may result in scar-like tissue in the lungs and in the pleural membrane (lining) that surrounds the lung. This disease is called asbestosis and is usually found in workers exposed to asbestos, but not in the general public. People with asbestosis have difficulty breathing, often a cough, and in severe cases heart enlargement. Asbestosis is a serious disease and can eventually lead to disability and death.

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, Public Health Service
Agency for Toxic Substances and Disease Registry

ToxFAQs™ Internet address is <http://www.atsdr.cdc.gov/toxfaq.html>

Breathing lower levels of asbestos may result in changes called plaques in the pleural membranes. Pleural plaques can occur in workers and sometimes in people living in areas with high environmental levels of asbestos. Effects on breathing from pleural plaques alone are not usually serious, but higher exposure can lead to a thickening of the pleural membrane that may restrict breathing.

How likely is asbestos to cause cancer?

The Department of Health and Human Services (DHHS), the World Health Organization (WHO), and the EPA have determined that asbestos is a human carcinogen.

It is known that breathing asbestos can increase the risk of cancer in people. There are two types of cancer caused by exposure to asbestos: lung cancer and mesothelioma. Mesothelioma is a cancer of the thin lining surrounding the lung (pleural membrane) or abdominal cavity (the peritoneum). Cancer from asbestos does not develop immediately, but shows up after a number of years. Studies of workers also suggest that breathing asbestos can increase chances of getting cancer in other parts of the body (stomach, intestines, esophagus, pancreas, and kidneys), but this is less certain. Early identification and treatment of any cancer can increase an individual's quality of life and survival.

Cigarette smoke and asbestos together significantly increase your chances of getting lung cancer. Therefore, if you have been exposed to asbestos you should stop smoking. This may be the most important action that you can take to improve your health and decrease your risk of cancer.

How can asbestos affect children?

We do not know if exposure to asbestos will result in birth defects or other developmental effects in people. Birth defects have not been observed in animals exposed to asbestos.

It is likely that health effects seen in children exposed to high levels of asbestos will be similar to the effects seen in adults.

How can families reduce the risk of exposure to asbestos?

Materials containing asbestos that are not disturbed or deteriorated do not, in general, pose a health risk and can be left alone. If you

suspect that you may be exposed to asbestos in your home, contact your state or local health department or the regional offices of EPA to find out how to test your home and how to locate a company that is trained to remove or contain the fibers.

Is there a medical test to show whether I've been exposed to asbestos?

Low levels of asbestos fibers can be measured in urine, feces, mucus, or lung washings of the general public. Higher than average levels of asbestos fibers in tissue can confirm exposure but not determine whether you will experience any health effects.

A thorough history, physical exam, and diagnostic tests are needed to evaluate asbestos-related disease. Chest x-rays are the best screening tool to identify lung changes resulting from asbestos exposure. Lung function tests and CAT scans also assist in the diagnosis of asbestos-related disease.

Has the federal government made recommendations to protect human health?

In 1989, EPA banned all new uses of asbestos; uses established before this date are still allowed. EPA established regulations that require school systems to inspect for damaged asbestos and to eliminate or reduce the exposure by removing the asbestos or by covering it up. EPA regulates the release of asbestos from factories and during building demolition or renovation to prevent asbestos from getting into the environment.

EPA has proposed a concentration limit of 7 million fibers per liter of drinking water for long fibers (lengths greater than or equal to 5 µm). The Occupational Safety and Health Administration has set limits of 100,000 fibers with lengths greater than or equal to 5 µm per cubic meter of workplace air for 8-hour shifts and 40-hour work weeks.

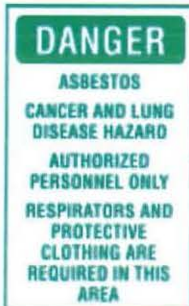
References

Agency for Toxic Substances and Disease Registry (ATSDR). 2001. Toxicological Profile for Asbestos. Update. Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service.

Where can I get more information? For more information, contact the Agency for Toxic Substances and Disease Registry, Division of Toxicology, 1600 Clifton Road NE, Mailstop F-32, Atlanta, GA 30333. Phone: 1-888-422-8737, FAX: 770-488-4178. ToxFAQs™ Internet address is <http://www.atsdr.cdc.gov/toxfaq.html>. ATSDR can tell you where to find occupational and environmental health clinics. Their specialists can recognize, evaluate, and treat illnesses resulting from exposure to hazardous substances. You can also contact your community or state health or environmental quality department if you have any more questions or concerns.



Attachment 2: OSHA Fact Sheet on Asbestos



OSHA FACT Sheet

Asbestos

What is asbestos?

Asbestos is the name given to a group of naturally occurring minerals used in certain products, such as building materials and vehicle brakes, to resist heat and corrosion. Asbestos includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these materials that have been chemically treated and/or altered.

What are the dangers of asbestos exposure to workers?

The inhalation of asbestos fibers by workers can cause serious diseases of the lungs and other organs that may not appear until years after the exposure has occurred. For instance, asbestosis can cause a buildup of scar-like tissue in the lungs and result in loss of lung function that often progresses to disability and death. Asbestos fibers associated with these health risks are too small to be seen with the naked eye, and smokers are at higher risk of developing some asbestos-related diseases.

Are you being exposed to asbestos?

General industry employees may be exposed to asbestos during the manufacture of asbestos-containing products or when performing brake and clutch repairs. In the construction industry, exposure occurs when workers disturb asbestos-containing materials during the renovation or demolition of buildings. Employees in the maritime environment also may be exposed when renovating or demolishing ships constructed with asbestos-containing materials. In addition, custodial workers may be exposed through contact with deteriorating asbestos-containing materials in buildings.

Are there any OSHA standards that cover workers exposed to asbestos?

Yes. The Occupational Safety and Health Administration (OSHA) has the following three standards to protect workers from exposure to asbestos in the workplace:

- 29 *CFR* 1926.1101 covers construction work, including alteration, repair, renovation, and demolition of structures containing asbestos.
- 29 *CFR* 1915.1001 covers asbestos exposure during work in shipyards.
- 29 *CFR* 1910.1001 applies to asbestos exposure in general industry, such as exposure during brake and clutch repair, custodial work, and manufacture of asbestos-containing products.

The standards for the construction and shipyard industries classify the hazards of asbestos work activities and prescribe particular requirements for each classification:

- Class I is the most potentially hazardous class of asbestos jobs and involves the removal of thermal system insulation and sprayed-on or troweled-on surfacing asbestos-containing materials or presumed asbestos-containing materials.
- Class II includes the removal of other types of asbestos-containing materials that are not thermal system insulation, such as resilient flooring and roofing materials containing asbestos.
- Class III focuses on repair and maintenance operations where asbestos-containing or presumed asbestos-containing materials are disturbed.
- Class IV pertains to custodial activities where employees clean up asbestos-containing waste and debris.

There are equivalent regulations in states with OSHA-approved state plans.

What are the permissible exposure limits for asbestos?

Employee exposure to asbestos must not exceed 0.1 fiber per cubic centimeter (f/cc) of air, averaged over an 8-hour work shift. Short-term exposure must also be limited to not more than 1 f/cc, averaged over 30 minutes. Rotation of employees to achieve compliance with either permissible exposure limit (PEL) is prohibited.

Are employers required to conduct exposure monitoring?

In construction and shipyard work, unless you are able to demonstrate that employee exposures will be below the PELs (a "negative exposure assessment"), you are generally required to conduct daily monitoring for workers in Class I and II regulated areas. For workers in other operations where exposures are expected to exceed one of the PELs, you must conduct periodic monitoring. In general industry, you must perform initial monitoring for workers who may be exposed above a PEL or above the excursion limit. You must conduct subsequent monitoring at reasonable intervals, and in no case at intervals greater than 6 months for employees exposed above a PEL.

Must employers create regulated areas?

You must create controlled zones known as regulated areas that are designed to protect employees where certain work with asbestos is performed. You must limit access to regulated areas to authorized persons who are wearing appropriate respiratory protection. You must also prohibit eating, smoking, drinking, chewing tobacco or gum, and applying cosmetics in these areas. You must display warning signs at each regulated area. In construction and shipyards, workers must perform Class I, II, and III asbestos work (and all other

operations where asbestos concentrations may exceed a PEL.) within regulated areas. In general industry, you must establish regulated areas wherever asbestos concentrations may exceed a PEL.

What compliance methods must employers use to control exposures?

You must control exposures to or below the PELs using engineering controls and work practices to the extent feasible. Where feasible engineering controls and work practices do not ensure worker protection at the exposure limits, you must reduce employee exposures to the lowest levels achievable and then supplement them with respiratory protection to meet the PELs. In construction and shipyards, each work classification has specific control method requirements. In general industry, specific controls are prescribed for brake and clutch repair work. For example, you must prohibit certain practices, such as the use of compressed air, to remove asbestos.

When are employers required to provide respiratory protection for workers?

You must provide and ensure the use of respirators when a PEL is exceeded. In construction and shipyards, you must require workers to use respirators when performing certain work. Generally, the level of exposure determines the type of respirator needed. In addition, the standards specify the type of respirator to be used for certain asbestos work. (See *CFR* 1910.134.) Employees must get respirator training and medical clearance to use respirators.

Are employers required to provide protective clothing for workers?

Yes. For any employee exposed to airborne concentrations of asbestos that exceed a PEL, you must provide and require the use of protective clothing such as coveralls or similar full-body clothing, head coverings, gloves, and foot coverings. You must provide face shields, vented goggles, or other appropriate protective equipment wherever the possibility of eye irritation exists and require workers to wear them.

Must employers provide hygiene facilities?

Yes. You must establish decontamination areas and hygiene practices for employees exposed above a PEL. In addition, employees may not smoke in work areas that might expose them to asbestos.

Do OSHA standards require employers to provide training?

Yes. In construction and shipyards, you must provide training for employees exposed above a PEL and for employees involved in each identified work classification. The specific training requirements depend upon the particular class of work being performed. In general

industry, you must provide training to all employees exposed above a PEL. You must also provide asbestos awareness training to employees who perform housekeeping operations covered by the standard. You must place warning labels on all asbestos products, containers, and installed construction materials when feasible.

What are employers required to provide concerning medical examinations?

In construction and shipyards, you must provide medical examinations for workers who, for 30 or more days per year, engage in Class I, II, or III work or experience exposure above a PEL. In general industry, you must provide medical examinations for workers who are exposed above a PEL.

What are the recordkeeping requirements for asbestos exposures?

You must keep accurate records of the following:

- All measurements taken to monitor employee exposure to asbestos—30 years;
- Medical records, including physician's written opinions—duration of the employee's employment plus 30 years; and
- Training records—1 year beyond the last date of employment.

How can you get more information on safety and health?

OSHA has various publications, standards, technical assistance, and compliance tools to help you, and offers extensive assistance through workplace consultation, voluntary protection programs, grants, strategic partnerships, state plans, training, and education. OSHA's *Safety and Health Program Management Guidelines* (*Federal Register* 54:3904-3916, January 26, 1989) detail elements critical to the development of a successful safety and health management system. This and other information are available on OSHA's website.

- For one free copy of OSHA publications, send a self-addressed mailing label to OSHA Publications Office, P.O. Box 37535, Washington, DC 20013-7535; or send a request to our fax at (202) 693-2498, or call us at (202) 693-1888.
- To order OSHA publications online at www.osha.gov, go to **Publications** and follow the instructions for ordering.
- To file a complaint by phone, report an emergency, or get OSHA advice, assistance, or products, contact your nearest OSHA office under the "U.S. Department of Labor" listing in your phone book, or call toll-free at (800) 321-OSHA (6742). The teletypewriter (TTY) number is (877) 889-5627.
- To file a complaint online or obtain more information on OSHA federal and state programs, visit OSHA's website.

This is one in a series of informational fact sheets highlighting OSHA programs and standards. It does not impose any new compliance requirements or carry the force of legal opinion. For compliance requirements of OSHA standards or regulations, refer to *Title 29 of the Code of Federal Regulations*. This information will be made available to sensory impaired individuals upon request. Voice phone is (202) 693-1999. See also OSHA's website at www.osha.gov.



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ATTACHMENT 3: Enforcement Addendum
(Confidential/FOIA Exempt)