U.S. ENVIRONMENTAL PROTECTION AGENCY POLLUTION REPORT

I. <u>HEADING</u>

Date: December 12, 2008

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Subject: Vibratech (aka Houdaille) Site – former automotive parts manufacturer. Wastes include abandoned asbestos on pipes and on floors, PCBs, PAH and PCB contaminated flooring.

POLREP NO: Three (3). Phase II Actions

II. BACKGROUND

SITE/SPILL NO.: XK

RESPONSE AUTHORITY: CERCLA/SARA

NPL STATUS:
RESPONSE TYPE:
CERCLIS ID:
Non-NPL
Time-critical
NYN000206025

REMOVAL START DATE: October 3, 2008 (Phase 2)

COMPLETION DATE: Pending

INCIDENT CATEGORY: Removal Action FUNDING DATE: September 29, 2008

ACTION MEMO STATUS: Signed by EPA on September 29, 2008

III. RESPONSE INFORMATION

A. Situation

See POLREP one.

B. Actions Taken

- 1. Cleanup personnel are continuing PCB debris removal within Site buildings. Work in the second floor offices (Area K) and loading dock (Area E) has been completed. Small areas in Areas K and E have intact asbestos and ACM debris mixed with PCB debris. These areas have been delineated and will be cleaned up during the asbestos abatement. PCB debris was bagged and staged, pending disposal with other PCB debris. Floors were lightly swept and HEPA vacuums were utilized to remove fine particles and PCB debris from floor surfaces. Cleanup personnel are proceeding in the front offices (Areas L and M, and the front of Area F) where extensive vandalism from ballasts has littered the floor with PCB debris.
- 2. Disposal of the wooden blocks is pending facility approval at a Subtitle D landfill. The wooden blocks are non-hazardous but have trace amounts of PAHs and other metals, though below regulatory limits for hazardous waste. The wooden blocks are stored in piles throughout Area F and are an impediment for asbestos abatement and PCB cleanup. The blocks are being carefully removed from Areas F and I, and will be disposed in bulk roll-off containers during the week of December 15.
- 3. Asbestos variances were requested in writing from NYSDOL for work to be performed in the main site buildings. NYSDOL denied the variance request due to jurisdictional issues. EPA is proceeding with the abatement in accordance with the submitted, but denied, variance request.
- 4. RST is on-site to provide technical support and air monitoring. Air monitoring for asbestos, lead, and PCBs have been non-detect in areas where personnel are working and at site perimeter locations.
- 5. Discharge of 25,000 gallons of basement flood waters is pending approval for discharge with the Buffalo Sewer Authority. Discharge is expected to occur the week of December 15.

C. Future Actions

1. Asbestos abatement will begin in early January. Work will begin with cleaning of floors with HEPA vacuums. Once floor areas of cleaned of debris, asbestos and PCBs, work will begin on the elevated asbestos on pipes.

D. Key Issues

None at this time

IV. COST INFORMATION: As of 12/12/08

Site Ceiling as of 12/12/08			
	Total Ceiling	Costs to Date	Amount Remaining
EPA Cleanup Contractor (Earth Tech)	\$ 1,662,569	\$ 250,000	\$ 1,412,569
EPA Technical Contractor (Weston Solutions)	\$ 400,000	\$ 18,000	\$ 382,000
EPA	\$ 400,000	\$ 10,000	\$ 390,000
Totals	\$ 2,462,569	\$ 278,000	\$ 2,184,569

The preceding costs reflect the amounts obligated to the project at this time but do not reflect the entire site ceiling amounts. If additional funding is necessary, the totals will be adjusted accordingly.

The accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data, which the OSC must rely upon, may not be entirely upto-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.