



AGENCY OF NATURAL RESOURCES

State of Vermont
Department of Environmental Conservation
Waste Management and Prevention Division
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July 2, 2013

Stan Chin, Acting Branch Chief, Emergency Planning and Response Branch
U.S. EPA - New England
Office of Site Remediation & Restoration (OSRR)
5 Post Office Square
Mail Code: OSRR02-2
Boston, MA 02109-3912

RE: Request for EPA Removal Assistance at the Vermont Asbestos Group (VAG) Mine
Eden/Lowell, Vermont (SMS Site #95-1825)

Dear Mr. Chin:

This letter is to formally request EPA Removal assistance to address a deteriorating onsite storage building filled with dry asbestos "ore." The estimated volume of asbestos "ore" within the building is 15,000 cubic yards. Although we are aware that other onsite buildings are also deteriorating, this building is in the worst condition. It is not certain whether this building will survive another winter. The state does not have sufficient resources to tackle an action of this magnitude.

The condition of the building has noticeably worsened over the last year. Metal sheets are progressively peeling away allowing water to enter the building and asbestos "ore" to spill out through the roof. In addition, the building siding is bulging, particularly the northern side, from the weight of the "ore" pushing against it. A structural failure of this building, which is inevitable, would potentially allow for the release of an airborne hazard into the environment. A sample collected from the dried "ore" had an asbestos concentration of 45%. Attached are pictures of the building and the asbestos "ore."

Given the failing sides of the building, re-stabilizing the building does not appear feasible or cost effective. The most likely course of action to address this pending release is to demolish the building, stabilize the asbestos "ore" with a cover, and dispose of building material onsite. Preliminary cost estimates, developed by Trust for G-1 Holdings, suggest the cost will be over \$1M. The Consent Decree (CD) signed in 2009 between G-1 Holdings and the state and federal governments requires G-1 Holdings to perform specific injunctive relief tasks, including measures to prevent releases of product or tailing material from the buildings to the environment; however, there is a \$250,000 cap for these building mitigation measures. We are encouraged that G-1 Holdings, through their Trust, is willing to provide monitoring support for this proposed action. As indicated previously, we do not have the financial resources even with the contributions from G-1 Holdings to perform this action. The limited resources that we do have are being reserved as a contingency to address likely O&M requirements in the future on previously EPA-installed erosion control measures.



My staff has already begun coordinating with other state agency and programs, including the State Historic Preservation Office, the Vermont Department of Health, and our solid waste program about this pending action. We are also willing to initiate contact with local officials. We have worked closely with the Removal Program before on this site and look forward to working with EPA again to address this potential threat to the human health and the environment.

If you have any questions about this request, please do not hesitate to contact me at (802) 760-8041.

Sincerely,



George Desch, Director
Waste Management and Prevention Division

Cc: Gary Lipson, EPA On-Scene Coordinator
Steve Novick, Emergency Response and Removal Section Chief
Linda Elliott, VT DEC Waste Management and Prevention Division
John Schmeltzer, VT DEC Waste Management and Prevention Division
Alyssa Schuren, VT DEC Deputy Commissioner

Photographs of the Dry Ore Storage Building



View of northern side of building. Light material to the right is asbestos ore leaving the building



View of eastern side of building.



2007 pictures of dried ore inside building

