

Environmental & Historic Preservation
Joint Field Office
30 Allen Martin Drive
Essex Junction, VT 05452

Memo
FEMA-4066-DR-VT

MEMORANDUM TO: Public Assistance, FEMA-4066-DR-VT

Date: 8/10/2012

From: Nancy Orth, Environmental & Historic Preservation Specialist, FEMA

RE: Recommendation to address with the applicant, as soon as possible, the potential for asbestos contamination based on the site's location in regard to the Vermont Asbestos Group (VAG) mine site.

Applicant: Town of Lowell, Vermont

Site: Culvert on Mine's Road, Lowell, VT
N 44.77016, W -72.51836

In response to the flood of May 29, 2012 (FEMA-4066-DR-VT) the Town of Lowell has requested FEMA funding to repair and upgrade a culvert on Miner's Road. The coordinates are N 44.77016, W -72.51836. Burgess Branch flows through the culvert and joins the Missisquoi River. The culvert is located just to the northeast of the Vermont Asbestos Group (VAG) mine site and is within an area of concern for asbestos contamination established by Vermont's Agency of Natural Resources (ANR), Department of Environmental Conservation (DEC), Waste Management Division.

In consideration that mine tailings containing asbestos may be in the sediment of the Burgess Branch at the location of the damaged culvert and that asbestos dusts and fibers can be found on surface waters, FEMA – EHP has sought guidance from ANR-DEC on the culvert upgrade and work within the water. On August 8, 2012 consultation began with Linda Elliott (802-479-8735, Linda.Elliott@state.vt.us) an environmental analyst for ANR-DEC's Waste Management Division. She is consulting with the ANR-DEC Waste Management Division, and as of August 9, has not heard from them, but provides the following guidelines:

- Contact for the VNR Water Quality Division is Chris Brunelle, River Management Engineer, 802-879-5631, chris.brunelle@state.vt.us.
- DEC requirements would include compliance with the Solid Waste Rules. If the river sediment is to be excavated and moved to another location, the material would need to be managed as a solid waste under the Solid Waste Rules. The Solid Waste Program will allow this material to be put back on the mine property (assuming approval from the site owner) versus going to a certified landfill. This can be accomplished by filling out 'An Insignificant Waste Management Event Approval Guidance Document and Application Form' and submitting to the solid waste program. Contact: Carey Hengstenberg, (802) 241-2653, carey.hengstenberg@state.vt.us. A copy of this form can be found at: http://www.anr.state.vt.us/dec/wastediv/solid/Permits/IWMEA_guidanceandapp.pdf

- Additional requirements outside of DEC jurisdiction may include VOSHA and Vermont Department of Health (VDH) Asbestos Program requirements. As the asbestos mine is an active hazardous waste site, workers coming into contact with river sediments containing asbestos will need to be OSHA certified. Also depending on the nature of the project, the VDH Asbestos Program may have additional requirements. Contact: Chris Kinnick, 802-863-7236, Christopher.Kinnick@state.vt.us. Additional information can be obtained at <http://healthvermont.gov/enviro/asbestos/asbestos.aspx>
- Attached is a memo that was sent to ANR employees back in 2008 that might help explain the employee training requirements to work at the mine site. This would be extended to where contamination has migrated too (i.e. surface waters/sediments). (Memo is attached to the FEMA email.)
- The Waste Management Division has a webpage on the asbestos mine at <http://www.anr.state.vt.us/dec/wastediv/sms/VAG.htm>

In consideration that non-compliance in the handling of hazardous and contaminated materials has serious and costly consequences, it is highly recommended that the applicant be made aware, as soon as possible, of potential special considerations that may include and are not limited to:

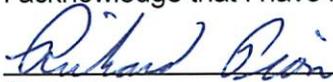
- additional permitting
- requirement of an OSHA certified workforce
- required monitoring of the site

Hazardous and contaminated conditions may entail additional costs, which can be considered on the Project Work Sheet. Additional information will follow as it becomes available.

If you have any questions or concerns, please contact me at 571-405-1915 or nancy.orth@fema.dhs.gov. You may also contact Peter Thomas, EHP Advisor, at 802-309-0190 or peter.thomas2@fema.dhs.gov.

Attachments: Maps

I acknowledge that I have reviewed and understand the above information:



Signature



Printed Name, Title and Town



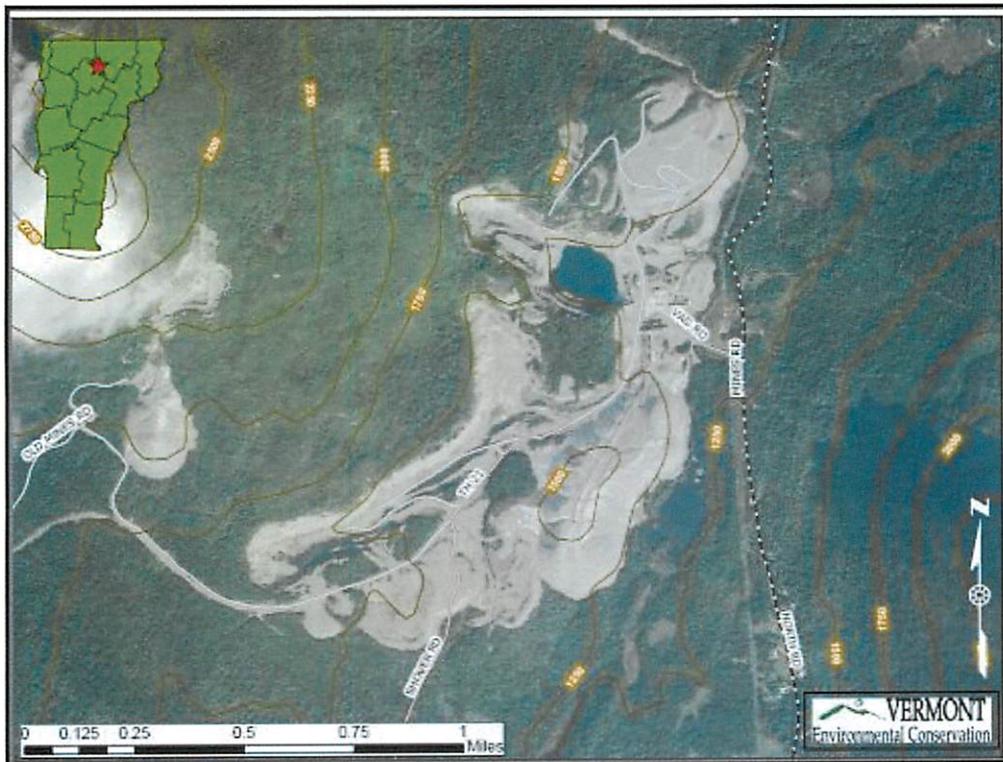
Signature



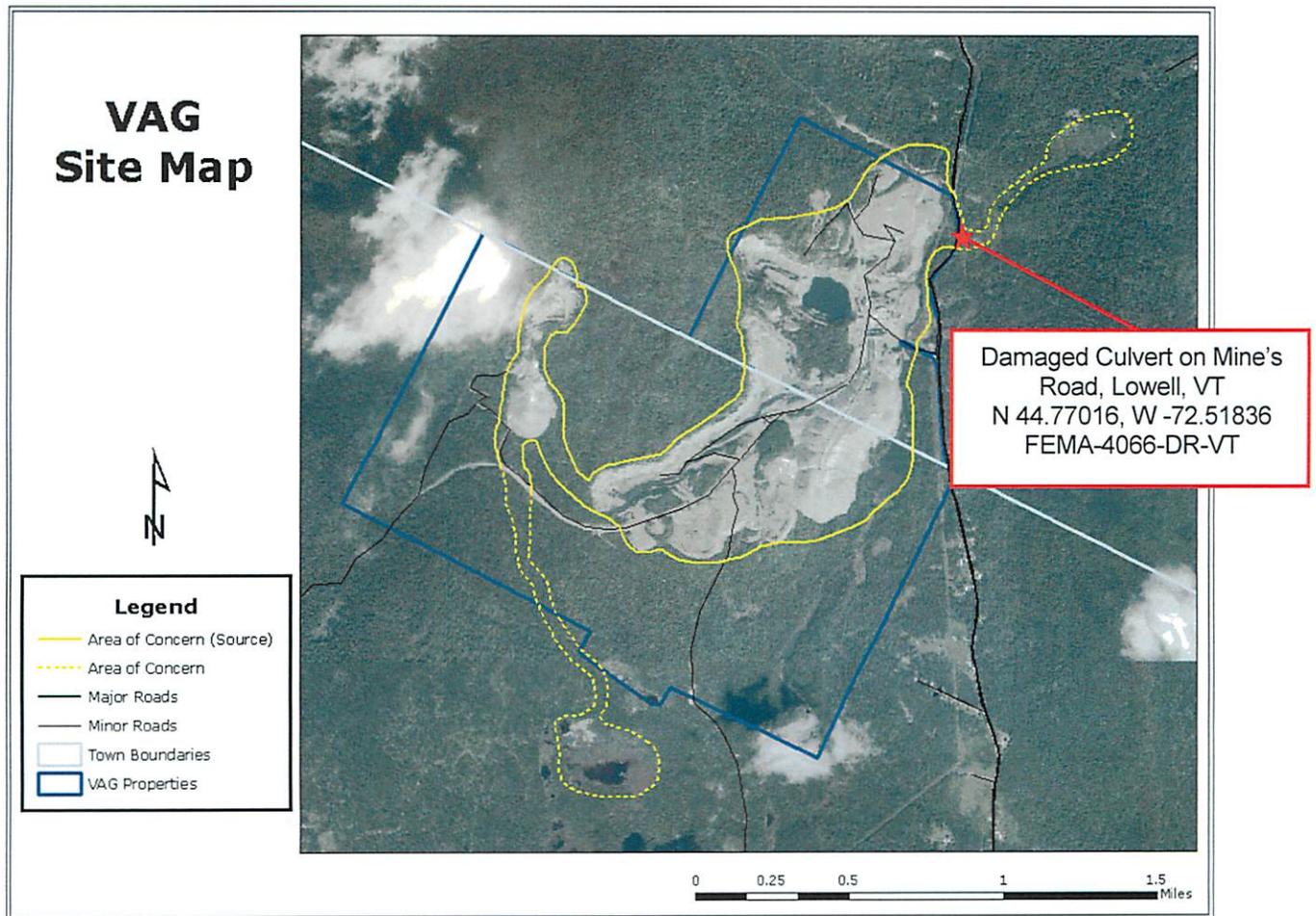
Printed Name, Title and Town



Map: 1 Satellite Image from ACME Mapper showing the Vermont Asbestos Group Mine and the location of the damaged culvert (A).



Map 2: Aerial photograph and map insert showing the location of the Vermont Asbestos Group Mine. Image provided by Department of Environmental Conservation (DEC) website (<http://www.anr.state.vt.us/dec/wastediv/sms/VAG.htm>)



Map 3: Areas of concern for asbestos contamination. Map was provided by the Agency of Natural Resources, Department of Environmental Conservation, Waste Management Division