

**PROPOSED CLEANUP PLAN FOR
ASBESTOS IN SOILS AT OLD CROW CREEK APARTMENTS
BUILDING FOUNDATION
AND
EXPANDED ASBESTOS ASSESSMENT IN SOILS AT TWO
ADJACENT PROPERTIES**

CROW CREEK SIOUX TRIBE RESERVATION, SOUTH DAKOTA

Submitted to:

CROW CREEK SIOUX TRIBE ENVIRONMENTAL OFFICE

By:

IECIS GROUP

**Date: October 2019
(Rev. 6)**

A Supplemental Phase II Environmental Assessment (2019) found asbestos in soils as the main concerns at the Old Crow Creek Apartments Building Foundation Site (Figure 1a). Because of additional concerns attributed to ACM released during demolition of the Old Crow Creek Apartments, the Tribe would like to conduct more soil testing in search of potentially present ACM at two immediate adjacent homes located south of Red Horse Road (Figure 1b).

The Crow Creek Sioux Tribal Council identified at least two options for asbestos abatement in soil for the Old Crow Creek Apartments:

Option 1: Conduct asbestos removal and soil remediation;

Option 2: Cover the contaminated area with a Concrete Slab (highest cost)

Option 3: Do nothing. This would compromise the health, environment, and welfare of the people living in the area or Children in the nearby Alternative School.

Additional action may be required depending on the finding of the ACM testing in soils adjacent to the Old Crow Creek Apartments.

IECIS shall perform the work in accordance to Crow Creek Sioux Tribe and U.S. EPA requirements. The work covered includes the handling of asbestos containing materials which are covered during clean-up, removal, and disposal operations and incidental procedures and equipment required to protect workers and people living in the vicinity of the site, or both, from contact with airborne asbestos fibers.

DESCRIPTION OF WORK:

IECIS and its contractor will perform the following tasks:

Task 1.

- a. Development of the following planning documents:
 - Health and Safety Plan
 - Quality Assurance Project Plan (QAPP) for confirmation sampling of asbestos and expanded assessment to include two adjacent properties
- b. Development of a Cleanup Plan

The Quality Assurance Project Plan (to be approved by Tribal EPA and U.S. EPA) will be used to conduct: 1) an expanded ACM testing in soils adjacent to the Old Crow Creek Apartments, and 2) confirmation sampling and clearance asbestos testing. We will do composite soil analysis for ACM after the work is completed.

Deliverable: Draft and final confirmation QAPP/SAP, health and safety plan and site security plan, and clean-up plan.

Task 2. Removal of regulated and hazardous materials present in the soil

IECIS Group will provide an Asbestos Inspector/Industrial Hygienist for removal of approximately 3,250 cubic feet of soil with a total footprint of approximately 1 acre that is impacted by non-friable/friable, asbestos containing floor tile at the Old Crow Creek Apartments Building Foundation site. The area of removal is shown in the zones subsequently stated and delineated in Figure 1b. The top 6 inches from sampling zones 1, 4, and 5 (see page 2 Cost Estimate for Cleanup Report, Weston Solutions, August 2019) would be scrapped. Zones 1 and 4 will be scraped up to 10 feet from the building foundation. Asbestos contaminated soil will be properly disposed of at the tri-county landfill in Pukwana, South Dakota.

Deliverable: Documentation on remediation and cleanup tasks.

Task 3. Disposal of all regulated and hazardous materials at a State/Tribal approved facility

Furthermore, IECIS Group onsite staff will provide an additional OSHA Asbestos training as specified in OSHA 1926.1101. The tribe will provide clean pressure washed equipment to scrape, load, and haul contaminated soil to the Tri-County landfill. IECIS will clean Tribal equipment used prior to returning it back to tribe.

IECIS Group onsite asbestos personnel will operate the equipment and conduct the soil removal, coordinate and document proper disposal of asbestos-impacted

soil. The scraped soil will be manifested and disposed of as ACM at the Tri-County landfill.

Deliverable: Documentation on disposal

Task 4. Conduct confirmation sampling to verify contamination has been successfully removed.

After the cleanup is completed, IECIS will conduct confirmation sampling activities so the Tribe can evaluate if the contamination was removed and the site can be reused without restrictions or whether institutional controls should be recommended for the site because contamination above regulated standards still remains. Composite soil samples will be taken after the soil is removed from the site and analyzed for asbestos. Sampling will be performed around the perimeter of the site using a random grid to determine sample locations. There will be 6 composite soil samples within 30 ft. around the structure to confirm that cleanup objectives are met.

In addition, IECIS Group will conduct eight additional composite samples (one for each side of each house, 4 sides and 2 houses), for the 2 properties adjacent to the former Old Crow Creek Apartments to confirm that asbestos did not spread outside the current cleanup area. An on-site random sampling grid will be set up on the red area of the attached diagram (Figure 1b). Sampling locations will then be determined using a random number generator. Further actions will be recommended depending on the test results.

Clean backfill material will be imported and used to regrade the scraped area at the Old Crow Creek Apartments Building Foundation site.

Deliverable: Testing results confirming successful completion of cleanup and recommendations for further actions at adjacent properties.

Task 5. Submit final report documenting cleanup has been completed. Close-out will include preparation of final report and documentation of cleanup activities and additional sampling at the two adjacent properties

Deliverable: Final report on successful completion of cleanup

TOTAL COST (not-to-exceed): \$8,000.00

Figure 1a- Old Crow Creek Apartments Building Foundation Site



**Figure 1b- Area Adjacent to Old Crow Creek Apartments Building Foundation Site
Where random sampling will be conducted**



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APPROVAL PAGE**

Christina Wilson, U.S. EPA Region 8 Project Manager

Date



Wanda Gourneau, EO-CCST Program Director

11/26/19 Date



Conrad Medicine Crow, CCST Brownfield Project Coordinator

11-26-19
Date



George Ghanem, PhD, IECIS Group Project Manager

11/26/2019
Date