



DEPARTMENT OF THE ARMY
BUFFALO DISTRICT, CORPS OF ENGINEERS
1776 NIAGARA STREET
BUFFALO, NEW YORK 14207-3199

REPLY TO
ATTENTION OF
Project Management

June 28, 2000

MEMORANDUM FOR THE RECORD

SUBJECT: Asbestos work ongoing at the Lake Ontario Ordnance Works

1. An initial safety briefing was held at CWM Inc. on June 27, 2000. Attendees included representatives of the Corps of Engineers, EA Engineering Inc., and Severson Environmental Inc. CWM (Ms. Becky Zayatz) gave the CWM safety requirements for contractors and visitors to the site. This training went well and established the CWM safety requirements for the two contractors currently on site. It is noted the Corps of Engineers has established its own site safety and health plans for work on this property.

2. An unannounced site visit was made after the briefing by Mr. Tony Cappella (Buffalo District Industrial Hygienist) and myself to view the site and observe ongoing activities. We observed the third party air monitoring being conducted by Quest Inc. and then observed subcontractor (Modern) employees removing asbestos (friable and non-friable). These are New York State licensed asbestos removal personnel that were working in an Asbestos Control Area.

• **FINDINGS**

a. Two personnel (Modern) were observed not wearing hard hats and had their respirators hanging around their neck. When they noticed our presence, both persons donned their respirators. This is an Asbestos Controlled Area that requires both hard hats and respirators. This is a clear violation and concern exists that the respirators could become contaminated. In addition, neither employee had their personal protection suits on properly (clear plastic not Tyvek). One had his suit only zipped part way to the neck. Neither employee was taped at the wrists nor ankles and neither had over boots on or their hoods.

b. We also observed workers bagging friable asbestos inside a building that were also not wearing their personal protection suits properly (unzipped).

c. This is the second notice of violations occurring with asbestos workers. An inspection on June 14th by Mr. Craig Georg (CENAB Industrial Hygienist) also observed asbestos worker safety violations.

MEMORANDUM FOR THE RECORD

SUBJECT: Asbestos work ongoing at the Lake Ontario Ordnance Works

3. Today I notified Sandy Staigerwald and Jeff Smith of EA Engineering Inc., the prime contractor of the safety violations.
4. Ms. Staigerwald informed me that she has notified Modern (subcontractor) and will enforce necessary safety measures required as part of our contract even if it means replacing the subcontractor. Ms. Staigerwald has been asked to continue to review this situation and take action required to ensure safety measures are followed.

\signed\

Ray Pilon
Project Manager
(716) 879-4146