



To: Mr. Ray Pilon, USACE-Buffalo
From: Sandra Staigerwald, EA Engineering
RE: ACM removal project safety violations

June 30, 2000

In response to the Memorandum for the Record dated June 28, 2000 by Mr. Ray Pilon, USACE-Buffalo (attached), EA Engineering has taken the following actions to eliminate any recurrence of violations during the asbestos abatement currently taking place at LOOW. These actions fall under two categories as follows:

Subcontractor Notification

- EA has forwarded verbal and written notification to Modern Environmental of the violations and has warned Modern that they will be removed as the abatement subcontractor if the violations persist. Modern Environmental has been informed that the violations included not wearing respirators and hard hats, and incorrectly wearing tyveks (unzipped, not taped).
- The Local Union laborers were verbally warned that they would be removed immediately from the project if any additional violations were observed.
- On 29 June, 2000, EA invited Local Union representative Mr. Mark Congi (Local 91) to the ACM removal area to discuss the violations.
- Mr. Congi and Mr. Mark Bull (Modern Environmental) discussed the violations in a meeting with the union laborers and stated that those individuals observed violating the requirements of the health and safety plan would be immediately removed from the project.

HASP Review and Additional Procedures Implemented

- EA Engineering also re-reviewed the requirements of the HASP, specifically in reference to the requirements of Level C PPE (Section 7.3.2 in the Final Health and Safety Plan for Phase I RI and the Addendum to the HASP for Phase I RI, for ACM Removal Activities) with Mike Bull, the project manager for Modern Environmental.

Tony C.
Bill K.

-
- As a modification to the HASP, Mr. Bull was directed by EA to review all of these requirements with his workers on a daily basis in a tailgate meeting and to have each member initial a “sign in sheet” each day documenting that they attended the meeting.
 - The EA oversight personnel for the ACM removal action will fax a summary of their daily record of activity to the EA Project Manager (Gordy Porter).
 - EA will report to the USACE any additional violations and actions taken on the date they occur.
 - The USACE will be formally notified if a change from the current ACM removal subcontractor becomes necessary.
 - Mr. Chip McLeod P.E. has been formally identified as EA's liaison at LOOW for discussions with Union Local 9 1.

If you have any additional concerns, please contact Mr. Gordy Porter (410-77 1-4950) or me (716-791-3981).

Cordially,



Sandra M. Staigerwald
EA Engineering
Project Scientist

cc:
Charles Basham
Gordy Porter
C. McCleod
J. Smith