

TO: RAY PILON

FROM: CLINTON ANUSZEWSKI

7 PAGES (INCLUDING THIS COVER PAGE)

9/28/98

MR. Bingert :

forwarded for Actrain

Ray Pilon

cc: F. Bogliac

REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, U.S. ARMY CORPS OF ENGINEERS
P.O. BOX 1715
BALTIMORE, MD 212034915

CENAB-EN-H (200-I c)

22 September 1998

MEMORANDUM FOR Commander, U.S. Army Corps of Engineers, Buffalo District, ATTN:
Mr. Ray Pilon, 1778 Niagara Street, Buffalo, New York 14207-3199

SUBJECT: Resume' of Staff Visit to Lake Ontario Ordnance Works Asbestos Abatement

1. Enclosed is a Resume' of Staff Visit prepared by Mr. Vernon Griffin as the result of his quality assurance visit to the subject project on 9 and 10 September 1998.
2. This Resume' of Staff Visit contains observations made in the field and recommendations for your consideration in improving site activities presently employed by the contractor. You will note that a constant theme is concern of potential cross-contamination. It is recommended that your Construction Division be made aware of this concern and that they institute field procedures to minimize the potential for cross-contamination.
3. Please be assured that any future visits to project sites will be coordinated in advance with the Project Manager and appropriate Construction Division personnel on-site.
4. Questions concerning the Resume' of Staff may be directed to my point of contact, Mr, Vernon Griffin at 41 O-982-3333.

Encl

Handwritten signature of Clinton L. Anuszewski in cursive.

CLINTON L. ANUSZEWSKI, P.E.
Acting Chief, HTRW Branch
Engineering Division

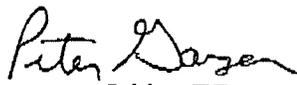
CENAB-EN-HI (201-1c)

21 September 1898

MEMORANDUM FOR Chief, Civil HTRW Section, **ATTN: Justina** WesleySUBJECT: Site Activity Obsevation, Lake Ontario Ordnance Work Asbestos Abatement, **Lewiston** and **Porter, Niagara** County, New York

1. Reference **verbal** request for site activii observation for referenced project.
2. The Industrial Hygiene and Chemistry Section has performed the field support and submits the **enclosed** Resume of Staff Visit.
3. The Industrial Hygiene and Chemistry Section point of contact for this project is Vernon W. **Griffin** at X3333.

Encl.



PETER GARGER
Chief, Industrial Hygiene
and Chemistry Section

CENAB-EN-HI (200-1c)

11 September 1998

RESUME OF STAFF VISIT

STAFF OFFICIAL: Vernon W. Griffin, CENAB-EN-HI, (410) 962-3333

PROJECT VISITED: Lake Ontario Ordnance Work, Niagara County, Lewiston, New York

DATE OF VISIT: 09-10 September 98

PRINCIPAL CONTACTS: Justina Wesley, USACE, Baltimore District (410) 962-6714; Kevin Cannon, Environmental Products and Services

PURPOSE OF VISIT: To provide **quality** assurance **overview** of asbestos abatement project.

FINDINGS:

Contractors from Environmental Products and Services were observed to be pressure washing the second floor of building **6-01** while other employees glove bagged asbestos containing material (ACM) that existed around piping. ACM, friable and non-friable, was present throughout the building, on the floor, piping and some equipment. It was noticed that some employees were wearing facial hair that would interfere with the donning of the respirator.

Building 6-01 is not enclosed allowing **wind** to **blow** through disturbing the friable asbestos.

Water used for pressure washing building **6-01** is not being collected or filtered. Water is draining from the building and onto the ground, saturating the soil and migrating down hill outside the identified **10** foot soil removal area. This water contains asbestos particles.

Equipment from the building is not moved to first floor for wiping and/or washing. Equipment washed in place. No **laydown** area has been **established**.

Bags of asbestos containing mortar not placed in drums during pressure washing of second floor. Mortar is covered with polyethylene and stored on first floor.

CENAB-EN-HI (200-I 0)

SUBJECT: SUBJECT: Site Activity Observation, Lake Ontario Ordnance Work Asbestos Abatement, Lewiston and Porter, Niagara County, New York

Metal shelving, beams, and other miscellaneous, metal that were located in building 6-01 and marked to be kept by the Somerset Group, haphazardly thrown into big piles on the ground outside of building 6-01 without being covered or cleaned.

Dust control measures were not in place. Soil containing visible, friable ACM, (i.e. crushed transit panels) observed blowing around the site. No perimeter air monitoring being performed. Air monitoring is being conducted on personnel and in the courtyard.

Decontamination area for equipment being used in areas where contact with friable ACM has not been established.

Equipment not maintained in one certain area or cleaned before being moved around the site and through areas that were not identified for soil removal, Equipment, (i.e. fork lifts), used inside building 6-01 observed to be tracking ACM from inside the building to areas 150 feet west of the building to the roll-off locations disposing of collected transite panels. This same equipment also noticed to be tracking ACM to other locations around the outside perimeter of building 6-01 that had not been identified for soil removal, Track hoe observed going from an area with visible ACM in the soil through areas not identified for soil removal without being cleaned. Track hoe observed moving from these areas and down a paved road-leaving dirt containing ACM without cleaning it up or wetting the road.

Several areas throughout the site with suspect ACM, (i.e. jackets), along with asbestos containing transite panels and other debris that, per contractor, were not identified as areas that need to be evaluated or cleaned up. The contractor stated that they bid and were awarded the contract on the 90% design, which did not address some of these areas.

Care should be taken to prevent unnecessary exposure to employees and the environment from asbestos fibers that could become airborne during abatement procedures. Inspection of employees should be done at the beginning of each workday to ensure that they are free of hair that will interfere with the donning of the respirator.

CENAB-EN-HI (200-1c)

SUBJECT: **SUBJECT**; Site Activity Observation, Cake Ontario Ordnance Work
Asbestos Abatement, **Lewiston** and Porter, Niagara County, New York

COMMENTS/RECOMMENDATIONS:

All contaminated wash water is required to **be** collected and filtered through a **HEPA** filter prior to **discharge** to the sewer or to grade. This can be accomplished by creating a **bermed** area with polyethylene to collect the water before discharge,

All items and equipment stored in **building 6-01** is required to be removed and decontaminated prior to the start of asbestos abatement. This equipment should be **placed** in the **laydown** area that should be located on **the** first floor of building **6-01**. The **laydown** area is required to have at a minimum, **three** layers of **6-mil** polyethylene within a berm. This equipment is required to **be** labeled or tagged and **transported** to a temporary storage area. This storage **area** is required to be **located** at least **100 ft** from and soil removal areas and is required to be free of asbestos. Removed **items** are required to be **taped**.

Bags of mortar should be placed in drums for containment. This is necessary to protect the mortar from being spread further by the wind. Preventing the spread of **contamination**.

Soil containing ACM and other items containing ACM will require **controlled** wetting down to minimize potential admissions. The soil should also be wetted down or completely covered while **waiting** for transport to the landfill.

Decontamination pads **should be** constructed to clean heavy equipment prior to it leaving contaminated areas for or through **"clean"** areas. These pads should be constructed in an area where the least possible **contact** with contamination will occur. This is to prevent the spread of contamination to areas not designated for soil removal.

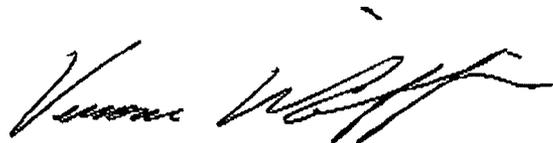
Roads should be wetted down **and/or** cleaned free of any contaminated dirt after **being used**. This is to prevent the spread of **contamination** and the control of potential admissions.

CENAB-EN-HI (200-1c)

SUBJECT: SUBJECT: Site Activity Observation, Lake Ontario Ordnance Work
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Roil-off containers should be placed closer to **the actual** work area so that the
equipment will not have to go through areas that **are** not designated for soil
removal when disposing of transit panels and other contaminated debris.

If there **are** any questions **concerning this** Resume of Staff Visit, please contact
the undersigned at (410) 962-3333.



VERNON W. GRIFFIN
Environmental Health Technician