



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

19
8 October 1998

REPLY TO
ATTENTION OF

CELRB-PP

MEMORANDUM FOR: Commander, U.S. Army Corps of Engineers, Baltimore District
ATTN: Mr. Clinton L. Anuszewski, P.O. Box 1715, Baltimore, Maryland 21203-1715

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

1. Reference CENAB-EN-HI Resume of Staff Visit to Lake Ontario Ordnance Works Asbestos Abatement memorandum dated 22 September 1998.
2. Attached are responses prepared by our contractor to each of Mr. Griffin's observations. For the purpose of clarity, the comment is stated followed by the response.
3. It is noted that Mr. Griffin spent considerable time meeting with the property owner without involving on-site personnel. This may have resulted in misunderstanding some of the issues.
4. In summary, we have concluded that our contractor is working properly in accordance with the provisions of the contract scope. We appreciate any recommendations to improve performance.
5. Please insure that any future visits to the project site be coordinated in advance with the Project Manager.
6. Any questions pertaining to this matter can be directed to Mr. Raymond L. Pilon at (716) 879-4146.


George B. Brooks

Deputy District Engineer for Project Management

29 September 1998

MEMORANDUM for U.S. Army Corps of Engineers, Buffalo District,
ATTN: Harold Leggett, 1776 Niagara Street, Buffalo, New York 14207-3 199

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

RESPONSE TO FINDINGS:

1) Contractors from EPS were observed to be pressure washing the second floor of building 6-01, while other employees performed glove-bag operations on existing pipe runs. ACM, friable and non-friable, was present throughout the building, on the floor, piping and some equipment.

Pressure washing operations were performed on the enclosed north section, west wing of building 6-01 immediately after approximately 10 linear feet of ACM piping was removed. Glove-bag operations were performed on remaining pipe runs throughout west section of building 6-01. Stacks of transite panels were mechanically loaded out. Miscellaneous piles of ACM debris were removed (wetted down, bagged out, & HEPA vacuumed) from the floor. Upon completion of these activities, the floor of the west section was then washed down. No pressure washing activities occurred on the second floor of the east section, only glove-bagging of pipe runs. The only equipment where ACM was present were the two hoppers. Containment tents were constructed around each hopper. Tents were put under negative air and abatement performed.

2) Building 6-01 is not enclosed allowing wind to blow through disturbing the friable ACM.

Enclosure of the building was not required.

3) Water used for pressure washing of 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 feet soil removal area. This water contains asbestos particles.

Water used for pressure washing of building 6-01 was being collected. Some water may have drained onto the ground outside of the building. The quantity of water was not enough to saturate the soil and migrate down hill outside the 10 feet soil removal area. If the water contained asbestos particles, the soil will act as a filter media and the particles will be deposited in the first three inches of soil. Soil extended 10 feet around the perimeter of the building will be excavated and removed at the conclusion of abatement cleanup operations in building 6-O 1.

4) 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.

Moveable equipment from the second floor west section was removed and placed on the first floor prior to operations. However, certain items/equipment were not removed to the first floor due to the size of the items. To remove the items left in place, structural components of the building would have had to been removed and items removed with minimum of a 25 ton Crane. Laydown area was not needed at the time of site visit. Equipment decon and laydown area constructed as of 9/23/98.

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

According to ACRES Asbestos Survey Report, bags of mortar were sampled (Sample Nos. 1-001A, 1-001B, & 1-001C) and samples were non detect for asbestos. Bags of mortar were located on the first floor east section of building 6-01, pressure washing activities occurred on the enclosed north section of the second floor west section. Bags of mortar were never in contact with pressure washing activities. At the discretion of USACE Representatives, bags of mortar were covered with two layers of 6-mil polyethylene sheeting until removal operations would commence in east section of building. On 9/21/98, bags of mortar were wetted down, re-bagged, and double bagged out of building.

6) Metal shelving, beams, and other miscellaneous metal 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.

All items located in building 6-01 are still located in building 6-01. The staged piles of scrap metal that is being referred to were already placed there prior to our arrival. Scrap metal piles were discovered during clearing and grubbing operations. Scrap metal will be cleaned and staged adjacent to work area once operations commence in those areas. Initially all scrap metal was to be disposed of by the contractor, upon site arrival it was discovered that the property owner wanted all scrap metal. To repeat, no items removed from building 6-01 and staged haphazardly outside of building.

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

Dust control measures were in place, all ACM materials in designated and demarcated work areas were being removed using wet methods. No soil removal operations were occurring at this point in the project. Soil excavation/removal operations commenced on 9/17/98, water truck on-site as a means of dust control. Excavation areas and haul roads wetted down to control dust emissions. Crushed or broken transite panels are not considered friable, for transite panels to become friable, panels would have to be grinded, sanded, or drilled into. Observed friable ACM blowing around the site is virtually impossible and not representative of site operations. First and foremost, we have collected over 300 representative samples throughout the property and work areas, all samples have resulted in levels at or below the limit of detection. Three samples have been detected above background (0.01f/cc), those samples were collected during abatement operations inside of a containment tent. ACM fibers are invisible to the naked eye. All air monitoring conducted in accordance with New York Industrial Code Rule 56. Perimeter/area air monitoring conducted in phases; backgrounds, pre-abatement (preps), environmentals, and clearance. Perimeter air monitoring conducted in areas where operations were being performed, if no operations were being performed in a particular area, no air monitoring was required.

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

Further clarification needed, equipment decontamination area was not established at this time.

9) 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. forklifts), used inside of 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 moving from these areas and down a paved road leaving dirt containing ACM without cleaning it up or wetting the road.

As of 9/10/98 equipment (i.e. forklifts) will be deconned prior to removal from work areas. Friable ACM pipe insulation was removed from the pathways of the forklifts prior to transite panel removal operations. Friable ACM insulation will not adhere to the wheels of the forklifts, therefore, tracking of ACM to other locations was not feasible. An equipment decontamination facility to be constructed at the conclusion of site operations. Equipment wiped down prior to leaving established work areas. Work areas are in close proximity that plywood covered with reinforced poly sheeting are used to cover road ways during the transportation of equipment to other work areas to prevent cross contamination.

10) Several areas throughout the site with suspect ACM, (i.e. jackets), along with ACM 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.

During site operations additional areas of ACM contamination were discovered. These areas were addressed to USACE Representatives per contract Section 01010. A change order is in the process of being established to include these additional areas.

11) 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.

Personnel air monitoring is conducted on a daily basis, personnel have not and will not be exposed to elevated levels of asbestos concentrations. On 9/10/98, site personnel were informed to be clean shaven. Site personnel will be given three separate warnings; (1) verbal reprimand, (2) written reprimand, and (3) removal from site. Personnel not clean shaven will be required to shave prior to donning a respirator or given the option of not working. Personnel observed during the site visit had a day to two day growth of facial hair and a goatee. In my experience and opinion, facial hair was borderline and employee was still able to get a good fit. On 9/11/98 employee was clean shaven; neck, face, and head. Workers are inspected and informed daily of site protocol during safety meetings.

If there are any questions concerning this Response to Findings of Staff Visit, please contact the undersigned at (716) 754-0952.

ENVIRONMENTAL QUALITY MANAGEMENT, INC.

\signed\

Brian Spears, CHMM
QC System Manager/Site Safety Officer



DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, U.S. ARMY CORPS OF ENGINEERS
P.O. BOX 1715
BALTIMORE, MD 21203-1715

REPLY to
ATTENTION OF

CENAB-EN-H (200-I c)

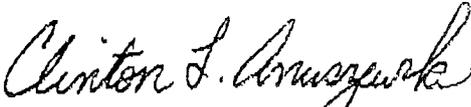
22 September 1898

MEMORANDUM FOR Commander, **U.S.** Army Corps of Engineers, Buffalo District, **ATTN:**
Mr. Ray **Pilon**, 1776 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


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

CENAB-EN-HI (201-1c)

21 September 1998

MEMORANDUM FOR Chief, Civil HTRW Section, ATTN: Justina Wesley

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

1. Reference verbal **request** for site **activity** 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-I c)

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 (200-1c)

**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 has 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 (200-1 c)

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.

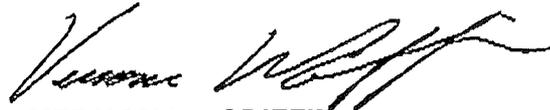
Roads should be wetted down **and/or** cleaned free of any contaminated dirt after **being** used, This is to prevent the **spread of** contamination and the control of potential admissions.

CENAB-EN-HI (200-1 a)

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

Roll-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

FACSIMILE TRANSMITTAL HEADER SHEET

For use of this form, see AR 25-1 1; the proponent agency is ODISC4

COMMAND/ OFFICE	NAME/ OFFICE SYMBOL	OFFICE TELEPHONE NO. (AUTOVON/Comm.)	FAX NO. (A U To VON/Comm.)
I: MAY PILON Project Manager	CELRB-PP	(716) 879-4146	(716) 879-4195, or (716) 879-4355
I-O:			
			410 962 6732

CLASSIFICATION	PRECEDENCE	NO. PAGES (Including this Header)	DATE-TIME	MONTH	YEAR	RELEASER'S SIGNATURE
		12	10/26/98			REP

REMARKS *Response to Mr. Griffin's observations @ LOOU.*

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