CBNSP 23.6.1.2

6/23/03

Piper Peterson-Lee

06/23/2003 11:55 AM

To: iainw@fsmseattle.com
cc: "Bill Conley (E-mail)" <bconley@kpffspd.com>, "Craig Williamson (E-mail)" <cwilliamson@kpffspd.com>, "David Schuchardt (E-mail)" <david_schuchardt@urscorp.com>, "David McEntee (E-mail)" <dmcente@simpson.com>, "John O'loughlin (E-mail)" <joloughl@cityoftacoma.org>, "Mary Henley (E-mail)" <mhenley@cityoftacoma., org>, Lori Cora/R10/USEPA/US@EPA
Subject: Re: Comments on Draft Demolition Plan for Work on Simpson Property

Thanks for your comments.

EPA and its consultants will not be reviewing any of the RA submittals until it has given the City the Notice To Proceed (NTP). The City was required to send EPA information regarding its contractor and its qualifications within 90 days of sending out its RFP (February 25, 2003) as per the approved schedule for the AOC dated March 27, 2003. This information was due to EPA no later than **May 26, 2003.**

I sent out a letter after our June 17 (see EPA, June 17, 2003) meeting to memorialize the information we discussed regarding the elements the City's contractors need to address in order to satisfy the CD requirements reagarding the Quality Management Plan (QMP) which is required as part of EPA's process to give a NTP. As soon as this information is recieved, EPA will review it in a timely manner and issue the NTP if the QMP requirements are satisfied.

If the City chooses to proceed with the RA, it does so at its own risk. EPA will continue to document the timelines required in the AOC (March 1994) and the CD (May 9, 2003).

Piper Peterson Lee
Superfund Project Manager
ECL-113, Region 10
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

work 206-553-4951
cell 206-719-0740
peterson-lee.piper@epa.gov

iainw <iainw@fsmseattle.com>

iainw
<iainw@fsmseattle.com>

06/20/2003 10:43 AM
Please respond to iainw

To: Piper Peterson-Lee/R10/USEPA/US@EPA, "David Schuchardt (E-mail)" <david_schuchardt@urscorp.com>, "David McEntee (E-mail)" <dmcente@simpson.com>
cc: "Mary Henley (E-mail)" <mhenley@cityoftacoma.org>, "John O'loughlin (E-mail)" <joloughl@cityoftacoma.org>, "Bill Conley (E-mail)" <bconley@kpffspd.com>, "Craig Williamson (E-mail)" <cwilliamson@kpffspd.com>
Subject: Comments on Draft Demolition Plan for Work on Simpson Property

These are the construction management team comments on the following submittals provided by Manson on June 9, 2003:
- "Site Health and Safety Plan" prepared by Argus Pacific;

USEPA SF
1304965

- "Health and Safety Plan" prepared by R.W. Rhine; and
- "Thea Foss Wheeler Osgood Demolition Plan" prepared by R.W. Rhine.

As there are multiple comments that require additional work by the contractor. I would like to forward them to the contractor as soon as possible. I would like to incorporate / combine any comments you might have on this plan with our comments and therefore, am inquiring as to whether you have any comments on these plans. Please give me a call or an email with your comments or intent / timing for comments. The comments are the following:

Comments on the "Site Health and Safety Plan" prepared by Argus Pacific

General Comment:

The scope of this Health and Safety Plan falls short of the requirements in specification Section 01100 in that it does not cover all items in 3.02 A through Q. If some of these items are going to be deferred to site specific HASPs that will be included as attachments as those items become necessary, then this should be explicitly stated.

Specific Comments:

Section 1-1 'Manson Safety Manual' referenced at end of section 1.1 should be included as an attachment. Additionally, all site specific Health and Safety Plans (such as the submittal for RW Rhine's work) should be attachments to this Argus HASP.

Section 1.3 Last sentence: Extensive control of sources of contamination to the waterways has been performed and documented by the Department of Ecology.

Section 2.1.2 Physical Hazards - This section references section 15 for a Health & Safety Inspection Checklist. A checklist as described in this section is not present in this section.

Section 2.4 Field Activities - This section contains hazard analyses for only three activities. There are multiple additional field activities that will be occurring as part of scope of activities described in other sections including: dredging, capping activities, removing debris piles from beneath existing structures (piers and wharfs), water quality monitoring, cap verification sampling etc. Provide Hazard Analyses for activities to be performed under this plan.

Section 2.4.1 (and most other Hazard Risk Analysis sections) Under the heading "Head and Eye Protection:" there are questions marks after 'reflective traffic vest'. Please verify need for this safety equipment or remove it.

Section 3.0 There is a reference to "Manson's Accident Prevention Program", please include documentation of this program as an attachment to the HASP.

Section 4.1.2 Delete "/She" in second sentence.

Section 6.0 This section indicates the use of Level D or Level D Modified but only describes Level D Modified in subsequent sections. If Level D is applicable to site activities (as is indicated in Section 6.4) then it needs to be summarized in this section.

Section 11 This section only describes exclusion and contaminant reduction zones for the CDF and dredge barges where contaminated sediment will be handled. Similar contaminated sediment will be encountered during debris removal below wharfs and during construction of the Middle Waterway Tideflat Habitat Mitigation site. Therefore, similar zones will be necessary where

contaminated debris/sediment is removed by means other than a dredge.

Section 12.3.1 Please add a bullet item reminding all personnel to wash their hands prior to eating or smoking.

Comments on the "Health and Safety Plan" prepared by R.W. Rhine

General Notes:

The scope of this Health and Safety Plan is specific to demolition activities identified in the plan to be performed by Rhine. This Health and Safety Plan does not address other demolition activities to be performed on the site such as utilities demolition, demolition of marine structures, well decommissioning, and asbestos abatement. Therefore, compliance with the project specifications concerning health and safety planning, training requirements, etc. for these other activities will need to be provided as separate submittals for review and approval prior to initiation of these demolition activities. The project specifications require that a Remedial Action Health and Safety Plan be submitted for review and approval 30 calendar days prior to the start of work.

Additionally, this plan provides documentation of medical monitoring, training, fit testing, etc. for Rhine employees only and not any other subcontractors that Rhine may enlist for specific activities such as air monitoring and wastes stream analysis sampling for lead. Therefore, additional information for subcontractors, including components of the pre-work submittals (i.e. medical monitoring, training etc.), may be required based on the scope of subcontractor activities to meet the requirements for lead control (Section 02075 1.04).

This Health and Safety Plan anticipates that all asbestos abatement has been completed prior to demolition activities. Therefore, clear communication between the contractor and subcontractors needs to occur to ensure that the asbestos abatement occurs prior to demolition activities.

General Comment:

1) The specifications require certification signed by an officer of the contracting firm that exposure measurements, medical surveillance and worker training record are being kept in accordance with WAC 296-155-176 per Section 02075 1.04 A. 3. Such certification needs to be provided as part of the pre-work submittals.

Specific Comments:

1) Section 3.2.1.2. Exposure Monitoring - See Specific Comment # 3 for the Demolition Plan concerning development of a Air Monitoring Plan. The analytical laboratory's certification for the analyses to be performed needs to be provided as part of the QA/QC procedures in the Air Monitoring Plan.

2) Table 4.1 Transportation of Materials-Loading Trucks - This portion of the table states that the drivers are to ensure that "soil" is secured during transport. Soil removal and transport is not part of the demolition activities. This portion of the table needs to be corrected to describe the materials to be transported.

3) Section 5.2 On-Site Monitoring Consultant - As stated above, additional information in the form of pre-work submittals and health & safety information may be required for these subconsultants based on the scope of their activities.

4) Section 5.4 Subcontractors and Suppliers - See Specific Comment # 3 above.

5) Section 6.2 Site Specific Training - This section states that the transportation subcontractors will not be included in the pre-work safety conference. Will there be a separate safety briefing for these subcontractors?

6) Section 11.2 Action Levels - This section should state that personnel performing work during the initial exposure monitoring meet the requirements of 296-155-176.

7) Section 11.3 Anticipated Levels of Protection - This second sentence in this section should state, " If, after the initial air monitoring, lead and silica levels remain below the action level, personnel may downgrade their PPE to Level D." Additionally, work on Simpson property requires the use or wearing of an orange traffic safety vest as stated in Section 01050 1.04 D. of the specifications.

8) Table 13.2 Personnel Contacts - Rob Reller will no longer be the Project Manager (as stated in the Partnering Meeting on 6/15/03). The new Project Manager's number should be noted in this document.

9) Section 13.3 Directions to the Medical Facility - The written directions and map to the medical facility start somewhere south of the actual site and need to be corrected in this document.

10) Section 16..3 Work Area - Throughout the document multiple terms have been used to identify areas of activity including the site, work area, demolition area, containment areas, regulated area, exclusion and contaminant reduction zone and it would be useful for clear descriptions or definitions to be provided in this section. My interpretation is that the site is the area contained within the fenced portion of Simpson property. The Containment Area is where lead exceeds the PEL. Does a Containment Area also include where silica exceeds the Action Level? The Containment Area is an Exclusion Zone and has a Contaminant Reduction Zone established leaving it. A work area is an area with the potential for exposure to hazardous chemicals which would be demolition areas during the exposure assessments which also is an Exclusion Zone with a Contaminant Reduction Zone leaving it. Provide clarification.

Comments on the "Thea Foss Wheeler Osgood Demolition Plan" prepared by R.W. Rhine

General Note:

The site / scope of this Demolition Plan is identified as demolition activities on upland and marine portions of Simpson property. A separate Demolition and Disposal Plan or plans will need to be prepared prior to demolition activities occurring at any other site or portion of the Thea Foss and Wheeler-Osgood Waterways Remediation Project. That plan is required to be submitted for review and approval and is required to contain a Waste Management Plan.

General Comments:

1) The specifications (Section 02050 1.05 and 3.03) require the preparation and inclusion of a Waste Management Plan within the Demolition and Disposal Plan. A Waste Management Plan that contains the components required in the specifications was not provided with this Demolition and Disposal Plan. Therefore, the plan is incomplete and a Waste Management Plan needs to be submitted.

2) As stated above, the site / scope of this Demolition Plan is identified

as demolition activities on upland and marine portions of Simpson property. Therefore, this plan should include all information required in the specifications for work in this area or reference other documents and submittals that include the information. This plan identifies demolition work to be performed by others on the Simpson property but does not provide adequate information to evaluate those activities in accordance with the project specifications. Some of these activities include utilities demolition, marine demolition, and asbestos abatement. Therefore, although the "Site" and "Scope" sections identify that this plan covers demolition activities for the entire area it is not clear whether other submittals will be provided for the work to be performed by others. These areas are identified in the comments below. Ultimately, it is up to the contractor to provide the specified information for all demolition activities on this site and it should be clear how that interaction will be performed by the multiple subcontractors and what plans cover the work.

3) The specifications require the presentation of the work sequence and schedule for work at this site which has not been included with this plan.

4) This plan does not include demolition (i.e. decommissioning) of monitoring wells located on the St. Paul / Middle Waterway Peninsula as specified in Section 02050 2.02 C. 4. There are specific state requirements as to notification and qualifications for decommissioning wells. Include decommissioning of the wells in this plan or identify whether it will be included in a separate submittal.

5) This plan identifies multiple disposal and recycling facilities for management of materials resulting from demolition activities that require City and EPA review and approval. In addition the work plan for asbestos abatement identifies a separate landfill (i.e. Greater Wenatchee Regional Landfill). The specifications require the contractor to provide the name of each facility, location (i.e. address of where the material will actually go), and facility type and associated state or federal identification numbers for all offsite facilities. This information can be submitted in a separate letter or memorandum so that it can be readily forwarded to EPA for review and approval. No material can go to an offsite facility unless the facility has been approved by the City and EPA.

Specific Comments:

1) Sections 1.1 Site and 1.2 Scope - Provide additional clarification as to what is included in the "marine remediation area" (i.e. Section 1.1) and the scope of Manson Construction's demolition activities if they are to be included in this plan.

2) Section 2.1 Asbestos Containing Materials - This section states that asbestos containing materials may be present in the building structures. In fact, asbestos containing materials have been confirmed to be present in the 300 Middle Waterway building. This section should clearly acknowledge the presence of asbestos containing materials at this location and specify that this building will not undergo demolition until completion of the asbestos abatement. This section identifies that others will abate under a separate contract. The question is whether the other contractor will be handling all aspects of the abatement (testing, handling, transportation, disposal, etc.) under separate plans (which should be referenced here) or whether some component of the activity will be performed by Rhine or other contractors for which additional information should be provided in this plan?

3) Section 2.2 Lead Containing Material - A Waste Management Plan should submitted that identifies the procedures for characterizing and managing this material as per the project specifications (Section 02050 3.03 and 02075) (also see comment # 13). The specifications require an Air

Monitoring Plan to be prepared for monitoring lead. The comprehensive plan includes sampling strategies, procedures, analysis methods, sample interpretation, and all QA/QC procedures (i.e. Section 02075 1.04 6.). Information concerning exposure monitoring consisting of air monitoring is presented in Section 3.2.1.2 of the Health and Safety Plan, however, this information does not meet the intent of the specifications for the Air Monitoring Plan.

4) Section 3.1 Public Safety (Access) - This section states that access to the work areas "can" be restricted. Then is it going to be restricted? Will there be signage identifying that the site is a construction area, there is truck traffic, etc.? The section identifies that there will be additional demarcation during lead assessments. Will there be similar demarcation during asbestos work?

5) Section 4.1 Personnel Safety - Review of the Health and Safety Plan referenced in this section identifies that the plan does not include work to be performed by Manson or others who would be performing marine demolition activities, utilities demolition, and well decommissioning. Therefore, another Health and Safety Plan or plans should include the information required to meet the project specifications

6) Section 5.1 Waterways - Additional information needs to be provided as to what the "necessary environmental controls" include. The plan should also include the location and procedure for transferring piling to a upland area for management and disposal.

7) Section 6.1 Utilities - As stated above, provide additional information or reference where the information for this activity is located so that it can be evaluated against the project specifications.

8) Section 8.2.2 Concrete Rubble - What is the timing or sequencing of removal of these materials? As these materials are slope protection, removal may cause erosion in some areas. Will the removal be timed with a subsequent action that would provide permanent erosion prevention (i.e. construction of the Middle Waterway Habitat Corridor or Tideflat Mitigation sites, construction of the CDF, etc.) or will a temporary slope protection be applied?

9) Section 8.3 Timber Bulkhead - See comment # 8. The specifications require the use of a containment boom throughout the course of piling removal and removal of materials that fall into the water. The specifications require that the floating containment boom details be provided in this plan. Identify that a containment boom and debris removal will be utilized for this activity along with the details for the containment boom.

10) Section 8.4 Piling & Marine Wood - Additional information needs to be provided on the procedures for removing piling and other wood from the marine environment (i.e.. scope, methods, specific environmental controls, etc.) and where and how the materials will be transferred upland for management and disposal or whether this information is to be provided in a separate plan.

11) Section 9.0 Haul Routes - Will all materials be transported via truck to the disposal or recycling destinations or will some of the materials be transported by rail? The Waste Management Plan should identify the proposed transportation methods and routes to the disposal sites.

12) Section 10.1.1 Treated Wood - Is Roosevelt Regional Landfill permitted to take other forms of treated wood that may be encountered on this project or just creosote treated wood? Where will untreated wood or vegetation be

taken to?

13) Section 10.1.2 General Building Debris - As stated above, the procedures for sampling and analysis, controlling release of lead dusts, segregation and management of this material based on the results, transportation and disposal, including meeting Dangerous Waste Requirements should be provided in the Waste Management Plan as required in the specifications Sections 02050 and 02075.

14) Section 10.2.3 Iron and Metals - What does the notation "exempt for lead re-smelt" mean?

15) Section 11.1 Material Disposition and Reporting - The specifications (Section 02050 3.03 C.) requires that the contractor maintain a debris removal log for materials generated during the work to track characterization and transportation of these materials. A copy of a debris removal log was provided to the contractor during the Pre-construction meeting. Additionally, the specifications require that truck trip weight tickets (documentation of transport to the facility) and disposal receipts (documentation from the facility receiving the material) be provided for all wastes. These materials should be submitted regularly so that the City can ensure that these materials are being managed and transported in accordance with the project specifications and plans.

Iain Wingard
Floyd Snider McCarthy, Inc.
83 South King Street, Suite 614
Seattle, WA 98104
Email:
iainw@fsmseattle.com
Phone:
Cell - (206) 595-7402;
FSM Seattle Office - (206) 292-2078;
Foss Field Office - (253) 404-6995.
Fax:
FSM Seattle Office - (206) 682-7867
Foss Field Office - (253) 573-1927