WA 6819
6/21/04
8c

FILE COPY

Anna Filutowski

From: Tom Colligan [thomasc@fsmseattle.com]
Sent: Monday, June 21, 2004 11:21 AM
To: (b) (6) [redacted]; Anna I. Filutowski (E-mail)
Cc: Ernst, William D
Subject: Boeing Plant 2 Phase II Transformer Investigation - Appendix C-Catch Basin Sampling - Safety Aspect

Anna –

This is coming from Will Ernst from a Floyd Snider McCarthy Inc. email, as that is where I am today. Please reply to this email address and to my regular email address as well.

In response to your subject request (forwarded below) to provide a logic flow for sampling of the four catch basins structures (on the Boeing side of the Transformer Investigation Area) during the visual/video survey work, please consider the follow process.

1. Ensure safety protocols enabling access to confined catch basin structure are met.
2. Conduct visual/video survey; determine if grit is present in structure. Document observations.
3. If grit material is present in structure, sample grit according to submitted draft plan sampling method.
4. If no grit is present or following grit sampling, reinstall catch basin hardware.

This is pretty straightforward, but then it's just a hole in the ground. If the above process logic works for our administrative purpose, we are ready to do this part of the field work this week, even tomorrow if we hear back affirmatively from you today.

Thanks for you quick review of this important matter.

Will Ernst
425.891.7724
fx. 206.544.7297

-----Original Message-----
From: Anna Filutowski [mailto:(b) (6) [redacted]
Sent: Friday, June 18, 2004 2:23 PM
To: Ernst, William D
Cc: Anna Filutowski
Subject: RE: Phase II Transformer Investigation - Appendix C-Catch Basin Sampling Plan - Safety Risk Evaluation

Will –

Thank you for this important information regarding workers safety.

We agreed to visual and survey report with sampling points to be decided based on the report.

USEPA RCRA
3017111

The current proposal asks that the sampling occur in one step without the opportunity for EPA to review the final sampling points.

EPA requests that Boeing submit a logic or process that would be used for selecting the samples. Upon review and approval of this logic, we would agree to a single step program. In any event, if safety issues should arise that modify the program, we would expect to be notified.

Thank you,

Anna

From: Ernst, William D [mailto:william.d.ernst@boeing.com]
Sent: Thursday, June 17, 2004 12:04 PM
To: EPA - Anna Filutowski; EPA - Anna Filutowski (home)
Cc: Ecology - Hideo Fujita
Subject: FW: Phase II Transformer Investigation - Appendix C-Catch Basin Sampling Plan - Safety Risk Evaluation

Anna -

We have gone into the details necessary for video surveying the storm system in the Transformer Investigation area, and we have identified some important human safety concerns that we need to address before the work can begin. They are captured in the forwarded email and attached draft graphic. The graphic is what we're working with to plan the video survey work; the graphic in final form will be part of the Appendix C, identified in the Phase 2 Work Plan..

In short, serious safety concerns lead us to want to collect the catch basin grit samples DURING our video surveying. This is preferred so as to not have to go back into these confined spaces much later a second time to sample the grit after that sampling step is defined in Appendix C plan. Per the draft Phase 2 plan you have, Appendix C can only be submitted after the video work, which is intended to establish where samples can be taken.

We've lined up the video survey crew, and it was their input and experience that has provided the detailed understanding of the operational details. The physical actions involved with gaining access in these structures and putting people into holes in the ground are not trivial, and I want to minimize those real risks to people. This applies equally to the storm system lines on Boeing and Jorgensen property.

The present Phase 2 plan isn't commented on or approved, and you and I agreed via a Field Work Notice that we could do the video survey work in advance of the Plan comment/approval. There seem to be two options to get around this risk problem and how we administer the work involved.

1. We sample the grit (which at this point we are assuming is there to be sampled) while we're in the holes to videotape under the authority of the Field Notice. The draft Phase 2 plan refers to samples being taken, just not exactly where they are to be taken. That detail would be documented in Appendix C. If this approach is acceptable, EPA could provide field oversight of this sampling if that is useful for you.

2. Alternatively, and this is more per the process, we could interrupt our work under the Field Notice, and produce and submit a plan specific to this video and sampling step. It would go through its

own comment/revision/approval process. That plan approval process is slower and it will take more resources from you and me to administer it, but it is still better than putting people at risk twice when once can be enough.

Either way is fine for me. I just want people doing the work to be at risk as little as possible. Please let me know how you would like to proceed.

Thanks.

Will Ernst
425.891.7724
fx. 206.544.7297

-----Original Message-----
From: Fuller, Steve [mailto:Steve.Fuller@WestonSolutions.com]
Sent: Thursday, June 17, 2004 10:19 AM
To: Ernst, William D
Subject: Phase II Transformer Investigation - Appendix C-Catch Basin Sampling Plan - Safety Risk Evaluation

Will,

I just finished a Safety Risk Evaluation for the planned visual/camera survey of the storm drains on Plant 2 and Jorgensen. Based on this evaluation I recommend we slightly modify the approach we presented in the subject work plan in the interest of worker safety.

As you know the Phase II Transformer PCB Work Plan states Appendix C - Catch Basin Sampling Plan will be submitted to EPA, after and with, the results of the storm drain visual/camera survey. I order to conduct the surveys we have the requirement of a **Confined Space Entry Permit** to get the camera into the bottom of the storm drain manholes (i.e., 3-person crew, rescue equipment, atmosphere maintenance, etc.). For a fairly straight forward job, it has a very high worker safety risk score.

If we follow the Work Plan approach, we will subject our workers and subcontractors to these risks once for the camera survey, and then a second time for the grit sampling we are proposing (see attached plan drawing). We are essentially doubling our risk to worker safety.

Our draft catch basin sampling plan (attached) has identified five (5) locations where we plan to sample grit from catch basins/manholes. The visual/camera survey planned for Plant 2 will provide access to three (3) of these five locations. The others on Jorgensen property would follow later. I the interest of managing our worker risks it would behoove us to collect grit samples from these locations when we do the visual/camera surveys. Pursuant to the work plan these samples could be frozen and archived for analysis once the plan is approved, if that is EPA's desire.

<<Trans.pdf>>
I know you can appreciate my concern for keeping folks safe on the job.

Thank you for taking this under consideration. I look forward to your direction.

Best regards,

Steve Fuller, P.E.G.
Weston Solutions, Inc.
190 Queen Anne Ave. N

Seattle, WA 98109
206.521.7652 (0)
206.521.7601 (F)
206.276.7844 (Cell)
steve.fuller@westonsolutions.com