From:	Williams, Jonathan
To:	Sheldrake, Beth
Cc:	McDonnell, Kimberlee
Subject:	FW: FMC OU Safety Summit and Site Visit
Date:	Tuesday, December 09, 2014 4:01:29 PM
Attachments:	image001.png Pocatello Safety Summit (Nov2104)-2.pdf Pocatello Safety Summit (Nov2014) Sign In.pdf Pocatello Safety Summit (Nov2014) Parking Lot Items.pdf

---

Chuck's report is an e-mail. The Safety Summit info is attached.

Jonathan Williams, LHG
Remedial Project Manager
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900, ECL-111
Seattle, WA 98101

Telephone: (206) 553-1369
E-mail: williams.jonathan@epa.gov

From: Greutert, Ed [USA] [mailto:greutert_ed@bah.com]
Sent: Tuesday, December 09, 2014 1:27 PM
To: Williams, Jonathan
Cc: Myers, Charles [USA]
Subject: FW: FMC OU Safety Summit and Site Visit

Jonathan-

Attached is Chuck Myers' report and thoughts from the safety summit. Please let Chuck or myself know if you have any questions.

Tx,

Ed Greutert, P.E.
Sr. Associate
Booz | Allen | Hamilton

Office: 206 652 3014
Mobile: 206 794 7526
greutert_ed@bah.com

From: Myers, Charles [USA]
Sent: Friday, November 28, 2014 11:25 AM
To: Greutert, Ed [USA]
Cc: Qureshi, Amjad [USA]
Subject: FW: FMC OU Safety Summit and Site Visit

Ed,

Please accept this as a summary of my site visit to the Pocatello, Idaho FMC OU project site on

November 20th and 21st. The visit coincided with Safety Summit 2 which I also attended.

I met with Cliff Merrill, CZE/BAH onsite representative, prior to the initial site visit to discuss the overall project including ongoing site activities, project organization, and project schedule. He explained the roles of all the stakeholders and their involvement with ongoing activities.

We met with Mark Smith, Kase/Warbonnet, prior to the initial site tour. Mark provided the visitor site orientation training as well as providing a detailed response to Undocumented Subgrade Conditions (USCs), which is a response to P4 contaminated materials. These are subsurface pockets of phosphorus that are encountered during grading activities. Once uncovered, the material smokes as it reacts with air. Mark is one of the incident commanders responsible for reacting to these occurrences and he has institutional knowledge of working with the material.

Following the orientation and the response discussion, Cliff escorted me on a detailed site tour. This included all active and inactive work areas on the site. For the most part, all site workers were confined inside the cabs of their site equipment. This included trucks, backhoes, dozers, excavators, water trucks, and loaders, all equipped with positive pressure air units inside the cab. With the cabs under positive pressure, the likelihood of fugitive dust entering the employee breathing space inside the cab becomes significantly minimized if not eliminated. Cliff also made a point to show me the fixed and movable perimeter air sampling stations and the onsite weather station.

During the site tour, there were no visible dust emissions observed despite the fact that there were several active earthmoving operations ongoing. This is an indication that the dust control efforts were successful during the time of the site tour.

There were two USCs reported during the actual site tour. While one of the USCs turned out to be a false alarm, we were able to observe the entire response to the other. The actual USC was observed to be a small release of white smoke coming from an unearthed pocket of material. A three man response crew was observed investigating the release, securing the area from regular site workers, staying upwind of the release, determining the extent of the actual contamination, covering of the suspect material with wet sand and soil, and relocating the materials to the coke bins. During the site tour, the response crew were the only people observed outside of their assigned equipment. We were able to observe the response from a safe distance inside our escort vehicle. The overall response was very measured and controlled and the response crew were obviously well trained with respect to how to deal with USCs.

Following the site tour, Cliff and I meet with Beth Sheldrake and Jonathan Williams, both with EPA Region 10 and both remedial managers responsible for the project. This meeting was in advance of the FMC Safety Summit 2 and provided additional background information concerning the project and insight with respect to the actual summit and it's anticipated participants.

The Safety Summit itself was a series of presentations by key site personnel on their areas of responsibility at the site. The presentation encouraged actual and continued dialogue between all the project stakeholders and the surrounding communities including the Shoshone-Bannock Tribal community.

The following are some professional suggestions based on the discussion occurring at the summit.

- There was a lot of discussion concerning the potential exposures to individuals involved with the soil moving operations. These seemed to stem from a misunderstanding concerning the characterization of the actual soils involved with the project. While I'm certain that the soils have been fully characterized and that this information has been communicated through numerous venues with all stakeholders, the messaging needs to continue. The contaminants of concern and their percentages in the site soils needs to be communicated and reinforced with the nearby communities.
- There also seemed to be some confusion with respect to the perimeter air sampling program and the ongoing air programs designed to quantify the exposure to the site workers. The perimeter samples are being generated to show that there is no off site impacts as a result of the ongoing site activities and to validate the dust control effort, whereas, the ongoing efforts in the cabs and on employees are designed to demonstrate that exposure levels are within permissible limits. There was some discussion by Marcella Wallace, CB&I Health and Safety Manager, that she would be doing some contaminant specific sampling inside of cabs and in employee breathing zones instead of total dust concentrations. This program should be structured similar to the initial, sampling frequency, and changes in monitoring frequencies per the OSHA asbestos standard 29 1910.1001 (d)(2) – (d)(5). Results of this sampling should be shared with the monitored employee. I suspect that over time there will be enough assessments of negative exposure that this program may be eliminated.
- There was also discussion with respect to the potential for exposure to radioactive materials. I would suggest that the soil data with respect to these materials be reviewed by a Health Physicist for a discussion concerning the collection of individual samples to document exposure potentials at the project site. Even if this sampling demonstrates that there aren't any exposures it will still be useful given the discussions concerning the issue.
- Marjo Carpenter, FMC Project Coordinator, introduced me to Mark Fleri, CIH with ERM. Mark periodically visits the site to perform safety inspections. If the inspection summaries are not provided to EPA, they should be requested.

On Friday 11/21/2014, I attended the daily safety meeting with Cliff, Beth, and Jonathan. A review of the day's anticipated site activities was provided as well as a summary of the Safety Summit to the approximately 40 meeting attendees.

Following the meeting and an orientation for Beth, Greg Cunningham provided us with a tour of the entire site. Of particular interest was the new excavation for the USCs storage area at the SW corner of RA – F2. We also toured the coke storage area where the USC material is currently being stored. Also looked at the two larger coned off USC areas.

Following the tour, Cliff, myself, Beth and Jonathan had a brief close out summit before exiting the site.

Please advise if you have any questions. I have attached the slides that were used during the summit, as well as, the attendance list and the list of issues that were put into a parking lot.

Chuck

Booz | Allen | Hamilton
100 YEARS

Charles J. Myers
CIH, CHMM, CPEA, MS

575 Herndon Parkway
Herndon, VA 20171
Mobile 703-943-0201
www.boozallen.com

From: Myers, Charles [USA]
Sent: Friday, November 28, 2014 2:20 PM
To: Greutert, Ed [USA]
Cc: Qureshi, Amjad [USA]
Subject: FMC OU Safety Summit and Site Visit