Re: PCB Remediation Work Plan - 1226 Linden Avenue, Minneapolis, Minnesota

Steve Johnson to: Aaron Benker 06/02/2005 04:34 PM
Cc: Anton Martig, Christopher Black

History: This message has been forwarded.

Aaron Benker,
Liesch Associates, Inc.
13400 15th Avenue North
Plymouth, MN

Dear Mr. Benker,

I reviewed the enclosed new work plan file, "Work Plan Ceiling Abatement.pdf", dated May 24, 2005. I note that the work plan goes beyond what was previously approved by U.S. EPA for the facility on May 14, 2003. The work plan now proposed is intended to upgrade remediation previously completed so that upon completion, the part of the facility being sold, Bays C and D, will have no TSCA use restriction. The work plan calls for removal of PCBs by sand blasting. No EPA approval is required for work completed according to 40 CFR 761.79(b)(3)(i)(B).

However, under the provisions of the self-implementing remediation rule 40CFR 761.61(a)(4)(ii), EPA approval following the risk-based provisions of 40 CFR 761.61(c) is required. Because the sand blast procedure does not appear to be entirely routine in this case and because it is being done to deregulate a property with an existing TSCA use restriction, I believe it is appropriate to take confirmatory wipe samples. I note that the work plan calls for taking a minimum of 40 randomized TSCA-standard 100 square centimeter wipe samples of the ceiling surface after it is cleaned to Visual Standard No. 2, Near-White Blast Cleaned Surface Finish. I recommend the analytical results of the samples be reviewed and approved under signature by a quality assurance/quality control officer from the laboratory or a designated third party. I understand that laboratory-qualified samples are subject to re-analysis, resampling or field remediation and re-sampling and note that in order to certify removal of use restrictions from Bay C and D, all final samples must be less than or equal to 10 micrograms total PCB per 100 square centimeters.

TSCA regulations for unrestricted use are satisfied by your plan. Therefore, I hereby approve of PCB Remediation Work Plan for 1226 Linden Avenue, Minneapolis, Minnesota, dated May 24, 2005.

If you have any questions, please feel free to contact me at 847-331-2924.

Sincerely,

Steve Johnson
US. EPA Region 5
Toxics Program Section

Aaron Benker <aaron.benker@liesch.com>

Aaron Benker <aaron.benker@liesch.com>
05/24/2005 02:55 PM

To

Subject PCB Remediation Work Plan - 1226 Linden Avenue, Minneapolis, Minn esota

Hi Steve,

Per our phone conversation this afternoon, I have attached a copy of the "Confirmation Sampling Work Plan for Removal of PCB Impacted Acoustical Spray-on Ceiling Texture" at the 1226 Linden Avenue Property. Goldridge and their contractor (Central Sand Blasting) desire to start the PCB remediation work as soon as possible so your timely review would be greatly appreciated. I will follow up with you on Thursday or Friday of this week to see if you have any questions or comments regarding the proposed work. Please feel free to contact me at 763/489-3147 with any questions.

Aaron Benker

Liesch Associates, Inc.

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Work Plan Ceiling Abatement.pdf