S. Sheldrake
10.8

MEMORANDUM CH2M HILL

TO: Bunker Hill Project Team and Meeting Attendees

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FROM: Joan Stoupa/CH2M HILL

DATE: June 28, 1995

SUBJECT: Minutes from June 7 and 8 Asbestos Meetings
Bunker Hill Superfund Site, Kellogg, ID

PROJECT: NPE69242.02.05

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ATTENDEES

Rich Fink/COE	Earl Liverman/EPA	Tom Wise/Converse Consultants
Sven Lie/COE	Howard Blood/EPA	Jan Matranga/Converse-IDEQ
Mark Ohlmstrom/COE	Mike Thomas/IDEQ	Joan Stoupa/CH2M HILL
Steve Meirh/COE	Armina Nolan/EPA	Rob Tucker/M-K
Mike Remington/COE	Becky Goehring/EPA	Felix Spittler/M-K
Mike Mahoney/COE	Joy Flack/OSHA	

AGENDA (original agenda attached, order of discussions changed during meetings)

1. A site visit to review the structures comprising the Industrial Complex (Lead Smelter and Zinc Plant) was conducted from about 11:00 a.m. to 1:00 p.m. with all meeting attendees.

2. Meeting discussions began ~ 2:30 p.m.

DISCUSSIONS - July 7

Methods of Demolition

General group discussions on asbestos survey data, structurally sound or unsound structures, worker safety issues, alternative methods of abatement in light of unsound structures, and approaches of designating structures unsound. Guidance clarification and group consensus was reached on the following issues:

1. Roofs: Per Tom Wise/Converse, asbestos consultant who conducted the asbestos survey, the asphaltic binder on roofing material is still impregnating ACM fibers in the majority of the roofs on the site. Based on this and the concern of worker

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safety in abating roofs (many of which are structurally unsound), Tom recommended that the majority of roofs would not need to be abated prior to demolition. This approach was agreed to by EPA and OSHA. Suggestions were made to remove the roofs in large pieces and to work under the "no visible emissions" goal (see below for interpretation of "no visible emissions"). The condition of the roofing ACM will be determined visually by an asbestos competent person.

2. Cement Asbestos Board (CAB) or Transite siding/roofing: The decision of whether to remove these materials prior to demolition will be based on structural integrity and whether areas can be safely accessed. If the transite can not be safely accessed, it will remain on the buildings during demolition. The materials will be wetted and demolition methods will be used that minimize the potential to render the transite friable (i.e., crumbled, pulverized, reduced to powder). If practical large sections of walls may be removed at one time. Perimeter air monitoring will need to be conducted to provide analytical data to evaluate the effectiveness of the methods used. Where asbestos siding can be safely accessed, the siding will be removed prior to structure demolition.

3. "No Visible Emissions": EPA's regulatory interpretation on visible emissions was that reasonable precautions need to be taken to ensure that emissions are being minimized by the best available methods. Best professional judgement needs to be used. An example was provided that every demolition/abatement activity should have a water source available to wet and control emissions. If visible emissions occur, the contractor is expected to make changes to the means and methods of either the work activity or increase the control method (in this case, water) to address the visible emission problem.

Supervision During Abatement

Questions were raised as to the level abatement crew supervision that is required by regulation. The following clarification of the NESHAP was provided by Armina Nolan:

1. The intent of the NESHAP requirements on crew supervision is to ensure that a competent supervisor is in contact with all crews that are working in regulated areas. Suggestions were made as to the acceptability of having one competent abatement supervisor for the Lead Smelter and another competent supervisor for the Zinc Plant. This type of approach was acceptable to Armina as a minimum. If more supervision was judged to be necessary, then more supervisors may need to be added.

Structural Integrity Surveys

General discussions on the hazards (mostly physical) associated with the structures on site. An MK structural engineer (Felix Spittler) had conducted a cursory reconnaissance of most of the structures and reported that in his opinion there were many locations that could not be safely accessed, while other areas could be accessed. The structural safety assessment would be addressed on a case-by-case basis.

Questions were raised as to the extent of interior abatement that would be required if only portions of a building were judged to be structurally unsound. Would abatement of the asbestos in the sound portion of the structure be required as well?

1. Both OSHA and the NESHAPs rely on the opinion of a competent person (i.e., licensed engineer, building inspector) to make the professional judgement of whether a structure is unsound or in danger of imminent collapse. EPA air compliance staff emphasized that they are not going to second-guess the assessments of the structural engineer with respect to safety. Again, best professional judgement and the knowledge of the means and methods of the demolition and/or abatement activity are expected to be considered in developing the engineer's opinion.

2. With respect to abatement approaches for structures in which a portion of the structure is judged to be unsound, it was agreed that higher levels within EPA would need to be consulted for their opinions and interpretations. Armina agreed to contact the appropriate people within EPA to see if they would be amenable to evaluating this issue with members of the Bunker Hill team (to include representatives from USACE, MK, and EPA [Armina, Earl]). For now, for partially unsound structures, MK agreed to abate what is accessible and safe in accordance with OSHA and NESHAP and leave the asbestos in the unsafe areas in-place during demolition.

3. Where practical, it was agreed that for mixed asbestos and demolition debris that MK would strive to have the debris remain within the area it was demolished and would cover the material for permanent disposal.

Hauling of Abated Asbestos

1. Asbestos and asbestos-contaminated debris that is hauled to the disposal area from the Zinc Plant will be hauled in covered leak-tight trucks. At the disposal area, that materials would be wetted prior to and during the off-loading procedure. Cover would then be placed over the disposed material.

Salvage

1. It was agreed that steel can be pulled from asbestos contaminated debris and deconned for future salvage.

Notification Requirements

1. The asbestos survey report provides the majority of the necessary notification requirements with the exception of who is conducting the work and when the work is to be conducted. A single work plan can be prepared for the 10-day notification with estimated dates provided. Updates would need to be provided when changes occur. The contractor can also submit individual 10-day notifications (can also be done for groups of buildings). EPA would prefer that the initial 10-day notification be submitted using their standard format as this would facilitate inputting the information into their computer system. EPA and MK would work out procedures for faxing and/or e-mailing notifications.

2. EPA also wants to be notified prior to the initiation of innovative abatement methods.

** end of discussions on July 7 **

DISCUSSIONS - JULY 8

OSHA Regulations

Joy Flack/OSHA distributed copies of the current OSHA regulations addressing asbestos abatement (OSHA 1926.1101). Joy proceeded to lead the group through the regulations identifying specific aspects that seemed particularly applicable to this site. Provisions of the OSHA regulations that had stays until July 10 were also identified as applicable. Other OSHA-related discussions included:

1. Joy felt that this site contained mostly Class I and Class II asbestos.

2. Joy stated that current OSHA regulations that require abatement workers to be fully-dressed out with supplied air would not apply to this site because of the physical hazards of the working environment. Joy also noted that the OSHA regulations provide for these types of situations.

3. Joy also stated that setting up negative air pressure containment areas probably did not apply to this site because of the ability to move workers away from a work area if needed.

Monitoring

1. Joy did not believe that a Negative Exposure Assessment would be feasible at this site because of the many workers that would be involved. Monitoring every day would be necessary.

2. Armina noted that perimeter and area samples are necessary. Armina specifically emphasized that monitoring should show how successful methods have been to ensure in controlling emissions. Monitoring data is also necessary to ensure the community that the work has been conducted in an appropriate manner.

** end of meeting minutes **

ASBESTOS WORKSHOP
SUPERFUND PROJECT OFFICES
(Old Pintlar Building, 1005 McKinley Avenue, Kellogg, ID)

AGENDA[1,2]
7 JUNE 1995

1030 - 1130 **Site Visit**
(on-site review of structures comprising the Industrial Complex)

1130 - 1200 **Facility Access/Briefing Requirements**
(access protocols and entry and exit briefings)

1200 - 1300 **Lunch**

1300 - 1330 **Notification Requirements**
(notification form and/or survey document, mail or fax, notification timeframe)

1330 - 1400 **On-Site Supervision of Abatement Activities**
(requirements for effective oversight)

1400 - 1500 **Protective Clothing and Respiratory Protection**
(recent requirements and/or guidelines)

1500 - 1700 **Methods of Demolition**
(structurally sound or unsound structures and effects on pre- and demolition methods, hand and/or heavy machinery techniques and effects on materials)

AGENDA
8 JUNE 1995

0800 - 0900 **On-site Waste Handling and Disposal Requirements**
(in-place disposal and/or material load out and transport for disposal)

0900 - 1000 **Procedures for Asbestos Emission Controls and Monitoring**
(controls and monitoring activities)

1000 - 1200 **Wrap-Up**
(resolution of any outstanding issues, formalization of outcomes)

[1]Parenthetic statement following each agenda item describes an activity or identifies discussion issues.

[2]Meetings will be facilitated by Howard Blood and Earl Liverman.

Corps of Engineers, U.S. Army

Walla Walla District

ENGINEERING DIV. BRANCH SECTION

Project Bunker Hill Superfund Project

Subject

By Date Checked Part Page of

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