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## W. R. Grace utility trench EPA On-Scene Coordinator comments

Please see note, after the comment fax, about "extension of the comment period on the plan" mentioned in the comment fax.

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### BY FAX

October 30, 2000

Robert F. Jenkins  
Vice President  
Manufacturing and Engineering  
Grace Construction Products  
W.R. Grace and Co.- Conn.  
62 Whittemore Avenue  
Cambridge, MA 02140-1692

RE:

**Utility Trench Excavation Release Abatement Measure (RAM) Plan/Asbestos Soil Management Plan: W.R. Grace, 62 Whittemore Avenue, Cambridge, MA DEP RTN 3-0277**

Dear Mr. Jenkins:

As discussed, I am outlining my comments on the Utility Trench Excavation Release Abatement Measure (RAM) Plan/Asbestos Soil Management Plan for your facility at 62 Whittemore Avenue in Cambridge. In addition, I have discussed these concerns with Mr. Jack Miano, of Massachusetts DEP. I have also contacted Mr. Harold Cox, Chief Public Health Officer of the Cambridge Health Alliance, and requested an extension of the comment period on the plan until November 17, due to the necessity to review these comments with Mr. Sam Lipson.

A copy of this letter will also be faxed to Ms. Amy Church, of Haley and Aldrich; I will be available to discuss the comments with you or with your representatives. In listing the report references matching these comments, I am referring to the Utility Trench Excavation Release Abatement Measure (RAM) Plan/Asbestos Soil Management Plan: Public Comment Draft dated 21 September, 2000.

**"Subsurface Characterization of the Utility Trench Area" - pages 9 and 10**

In reviewing the sampling and analysis methods used, I do not consider the "non-detect" results to be valid, because of the way the samples were composited. In performing soil sampling to determine the presence of asbestos, a composite sample taken from depths ranging from 0-5 feet does not provide results that are representative of the various soil contaminants or waste materials. The interval



sampled for each boring, using standard EPA Removal Program practice, would be no greater than one foot (depths of 0-1, 1-2 feet, etc.). This is a special consideration if there may be waste materials present, with a layer of clean soil beneath them, since compositing these materials together will reduce the waste concentration, if waste is present. The large sampling interval used here for compositing the sample (0-5 feet) renders the analytical results meaningless.

### **"Procedures for Mitigating the Generation of Dust" - page 13**

If the material generated by excavation is to be handled and placarded as "Special Waste" or asbestos waste, it should be immediately contained in the leak tight, covered, properly placarded and labeled container provided for shipping. No temporary storage outside the container should be permitted.

### **"Health and Safety" and "Air Monitoring Procedures" - page 14**

If the area considered to be the work zone is a 25-foot area, air monitoring should be performed at this perimeter. OSHA Permissible Exposure Levels (PELs) do not apply to this "perimeter monitoring"; they are standards set and appropriate for monitoring worker exposure only. The safe work practice for analyzing the results of perimeter monitoring, which EPA uses during its asbestos work, is that no measurable emissions of asbestos should be released from the work area as a result of the ongoing work, and that perimeter monitoring results should prove that there has been no release, using the detection limit of the available analytical methods as a standard. This generally necessitates placing upwind and downwind air monitors, in order to assure that there is no material blowing into the work area. If there are positive results for the perimeter air samples, work practices must be immediately investigated and addressed to assure that there are no future releases.

### **"Material Testing, Reuse and Off-Site Transport of Excess Materials" - page 15**

Excavated material to be shipped off site as "Special Waste" should not be replaced in the excavation; the soil should be immediately placed in its shipping container with a minimum of handling. Backfilling is an operation which makes dust control more difficult than excavation. Of course, the standard for work involving asbestos materials, "no generation of visible emissions" (no generation of dust) must be met through use of engineering controls, which include the proper handling of materials.

### **"Federal, State and Local Permits and Requirements" - page 15**

As you know, EPA is still in the process of conducting a Removal Site Investigation at the facility. As proposed in this plan, materials are being disturbed which could not previously pose an exposure risk, due to their being under the parking lot. This change in conditions at the facility leads me to request that EPA also be notified previous to the start of any ground-breaking activities.

The State Department of Labor, which administers the OSHA program in Massachusetts, might be contacted to learn whether establishment of a "regulated area" may be necessary.

### **"Appendix C - Air Sampling Event Reports"**

Levine-Fricke letter report dated December 2, 1999: Does the map provided just prior to the letter report show the location of the sampling stations for this air sampling round? It is not dated.

I appreciate the opportunity to comment on this excavation plan, and look forward to your response

to these comments. You may reach me at (617) 918-1256, if you need further clarification.

Sincerely,

Mary Ellen Stanton  
On-Scene Coordinator

cc: Amy Church, Haley and Aldrich  
Jack Miano, MA DEP Northeast Regional Office  
Sam Lipson, Cambridge Health Alliance  
Joseph J. Joseph, Alewife Study Group  
David Bass, Alewife Study Group  
Gretchen Muench, EPA Senior Counsel  
James Murphy, EPA Community Involvement

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**Note about "extension of the comment period on the plan" mentioned in the comment fax, from a Nov. 2 2000 email, to the Alewife Study Group webperson, from Mary Ellen Stanton:**  
"I wanted to clarify the "comment period extension" portion of the letter. The organization from which I requested an extension of the comment period was the Cambridge Health Alliance. Mr. Harold Cox granted an extension of the City's comment period to me. The extension of the comment period does not apply to the DEP's "Release Abatement Measure Plan"; I was able to discuss my comments with the DEP site representative, before the comment period on the plan's submission under the MCP was over. I did not request an extension of the comment period with respect to the MA DEP plan."

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Contact the Alewife Study Group, North Cambridge Massachusetts, by email at [info@alewife.org](mailto:info@alewife.org)