



March 14, 2011

Owen C. O'Riordan
City Engineer, Assistant Commissioner of Engineering
Cambridge Department of Public Works
147 Hampshire Street
Cambridge, MA 02139

**FINAL DECISION REGARDING ASBESTOS SOIL MANAGEMENT PLAN (ASMP)
FOR CAM 400 SEWER SEPARATION PROJECT AT W.R. GRACE PROPERTY AT 62
WHITTEMORE AVENUE**

Dear Mr. O'Riordan,

The Cambridge Public Health Department is issuing this Final Decision in order to direct the City of Cambridge Department of Public Works, acting under permission of the Responsible Party, *W.R. Grace & Company – CONN*. This decision will determine whether the appropriate soil management measures, equipment and practices are included in the Final Asbestos Soil Management Plan (ASMP) which was submitted for the proposed sewer separation work at 62 Whittemore Avenue in Cambridge, Massachusetts. This decision is rendered under the authority granted to the Commissioner of Health and Hospitals by the Cambridge Asbestos Protection Ordinance (Chapter 8.61 of the Cambridge Municipal Code).

The Cambridge Public Health Department has reviewed the *Final Asbestos Soil Management Plan* and the *CAM 400 Sewer Separation Project Responsiveness Summary* submitted to this department on Friday, March 11th, 2011 in order to determine whether reasonable precautions to prevent releases of asbestos, asbestos-containing material, or dust have been incorporated into this plan; and to see evidence that appropriate accommodations were made to address reasonable community requests for amendment of the *Draft Asbestos Soil Management Plan* (submitted January 10th, 2011). The Commissioner acknowledges that the Cambridge Department of Public Works did voluntarily extend the public comment period on two occasions and that this did enable community members to submit more detailed comments for review and incorporation into the *Final Asbestos Soil Management Plan*.

The Cambridge Public Health Department is issuing this draft decision in order to establish whether the dust and airborne asbestos mitigation measures required under the Cambridge Asbestos Protection ordinance (CAPO) are being met within this plan for proposed disruption of the existing asphalt and soil cap associated with CSO trench excavation work at 62 Whittemore Avenue in Cambridge.

The Commission also acknowledges that the City of Cambridge is not the Responsible Party ultimately accountable under the Cambridge Asbestos Protection ordinance (Chapter 8.61) and the Massachusetts Contingency Plan / MGLA 21E. However, by seeking the permission of the owner and Responsible Party, *W.R. Grace & Company – CONN*, the City of Cambridge is expected to

meet the same protective standards established by CAPO that would otherwise be imposed directly on the property owner. The following specific items need to be addressed before final approval.

It is the judgment of the Cambridge Commissioner of Health and Hospitals or his appointed representative that the concern outlined in his Draft Decision (January 20th, 2011) and included in the attached Appendix A have been adequately addressed in the ***Final Asbestos Soil Management Plan***. It is also the judgment of this office that reasonable acknowledgement, consideration, and inclusion of comments, concerns and suggestions submitted during that public comment period are also reflected in this final plan. The proposed work may proceed as long as it remains compliant with the ASPM as submitted and with all other provisions of the Asbestos Protection ordinance.

A handwritten signature in black ink, appearing to read "Sam Lipson". The signature is written in a cursive, flowing style.

Sam Lipson
Director of Environmental Health
Cambridge Public Health Department
119 Windsor Street, Lower Level
Cambridge, MA 02139

cc: Dennis Keefe, CEO CHA
Claude Jacob, CPHO
Donna Lopez, City Clerk's Office

Appendix A

Comments issued in Draft ASMP Decision on January 20th, 2011:

Page 8: Soil Management Practices:

The use of soil wetting or misting “as it is removed” does not sufficiently establish whether dust suppression with wetting or misting will be feasible with a single fogging nozzle. Indicate in ASMP what the expected range of misting coverage would be necessary for full suppression of excavated soils. Continuous misting or wetting is necessary to further reduce the risk that fugitive dust could escape the containment structure during entry and exit of personnel and material or be lost from the soil itself during later transfer and transport.

Page 10: Venting of Enclosures:

*It is not clear how the air exchange rate (listed in the ASMP as approximately 12 air changes per hour) was calculated. If there are 4,000 cubic feet per minute (2,000 cfm air filters X2) moving air out of the enclosure (= 240,000 cubic feet per hour) and the total air volume is 30' X 50' X 20' ft (30,000 cubic feet) then we would expect an air exchange rate of 240K/30K = **about 8 air changes per hour, rather than 12 changes per hour listed in the ASMP.***

Page 10: Venting of Enclosures

The pressure differential identified, 0.02 inches on a water gauge, should be sufficient to overcome intrusion of outside air as staff enter and leave the enclosure. If there is an industry standard or engineering rule of thumb that regards 0.02 inches differential is effective in an enclosure with periodic arrival and departure of site workers.

Page 10: Dust Control

The ASMP should indicate whether wheel washers or wheel wells will be used by trucks that are removing soil. This should be included if there is any indication that dust or dirt is being tracked onto nearby streets on tires of vehicles coming off the site.

Page 11: Dust Monitoring:

Use of the term “respirable particulate” in the Dust Monitoring Plan section should be clarified. This terminology is sometimes also associated with PM_{2.5}, with a much lower 24-hours NAAQS (35 micrograms/kilogram). Simple reference to “PM₁₀” would be less ambiguous. Likewise, expression of the applicable 24-hour NAAQS standard would be more easily recognized if expressed in micrograms/cubic meter rather than milligrams/cubic meter as it is in all EPA public literature.