

**Appendix F**  
**Asbestos Emission Control Plan**  
**(on CD-ROM)**

# **Asbestos Emission Control Plan**

**UMore Park  
MPCA VIC Project No. VP22480  
Dakota County, Minnesota**

**Prepared for the  
University of Minnesota**

**November 14, 2008**

**DRAFT**

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Figure 1 Site Location Map

# 1.0 Introduction and Project Description

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This Asbestos Emissions Control Plan addresses the potential risks associated with asbestos-containing materials (ACM) that may be encountered during proposed investigation, remediation and redevelopment at the UMore Park property (the Site). UMore Park is located in the City of Rosemount and Empire Township, Dakota County, Minnesota and is owned by the University of Minnesota (University). Figure 1 shows the location of the Site.

This Asbestos Emissions Control Plan (ECP) will be implemented during proposed investigation, remediation and redevelopment activities conducted in areas where asbestos has been identified during previous site investigations or reconnaissance or in areas with known buried debris or dump materials that may have the potential to contain asbestos. In addition, the ECP will be available for implementation as a contingency measure in all areas of the Site. The ECP addresses the potential risks associated with ACM as they are encountered, managed, and excavated and loaded for transport to an offsite disposal location. The procedures outlined in this ECP have been developed to ensure protection and safeguard from potential asbestos exposure of the workers, visitors, tenants, employees and the environment.

The necessary environmental investigation and remediation work along with the development process is expected to result in a project schedule spanning several years. This ECP will serve as a general plan for the entire Site through each phase of work and during the use of multiple contractors. If modifications to the ECP are required, the MPCA will be notified of the changes in writing prior to implementation of the work.

## 1.1 Site Description

UMore Park covers a 5,000 acre area that includes the grounds of the former Gopher Ordnance Works (GOW). The GOW was utilized in 1945 for less than a year by the U.S. Department of Defense for the production of oleum, smokeless canon powder, and rifle powder. Many of the 858 GOW buildings were constructed with asbestos-containing materials. Many of those buildings were demolished in place, buried in on-site dumps, and yet others remain standing today. In particular, several of the UMore buildings were constructed with transite siding and transite has been observed on the ground surface and is likely buried in some places on-site.

Additional sources of ACM may also be present and all suspect ACM will be sampled to prove otherwise or handled as ACM. Portions of the GOW were deeded to the Regents of the University of Minnesota by a Quitclaim in 1947 and 1948. Another section of land was bought by the University of Minnesota in 1961. In the 1950s, the University began leasing former GOW buildings, structures, and land to businesses and individuals. Pre and post-GOW farmsteads are also located on the site. The land is now used mainly for agricultural research by the University.

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## 2.0 Emission Control Procedures

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All asbestos related work will be conducted in accordance with Minnesota and Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements. Monitoring of airborne asbestos concentrations will be conducted in accordance with the Occupational Safety and Health Administration (OSHA) asbestos requirements for the construction industry, found in 29 CFR 1926.1101 (adopted by reference by Minnesota OSHA).

Asbestos monitoring and sampling will be conducted by an Asbestos Inspector certified by the Minnesota Department of Health (MDH) under the Asbestos Hazardous Emergency Response Act (AHERA). An Asbestos Inspector will be on-site at all times during work in areas where asbestos has been identified during previous site investigations or reconnaissance or in areas with known buried debris or dump materials that may have the potential to contain asbestos. All asbestos management work, including excavation of ACM, will be conducted by a MDH/AHERA-licensed Asbestos Contractor in accordance with all applicable regulations.

### 2.1 Roles and Responsibilities

A “Notification of Asbestos Related Work” will be completed and submitted to the MPCA Asbestos Program within 10 working days of project work in areas with known asbestos or buried debris or dump materials that have the potential to contain asbestos. If asbestos is encountered unexpectedly, the MPCA Asbestos Program will be contacted and an “Emergency Notification” will be submitted if appropriate. *All potential ACM will also be immediately reported to Sean Gabor of the University of Minnesota at 612-875-8857 (cell), 612-625-7547 (office), gabor002@umn.edu.*

In accordance with University policy, each on-site worker at UMore will be required to take Asbestos Awareness training and will be responsible for avoiding disturbing in-place ACM. As stated previously, MDH/AHERA-licensed Asbestos Inspector will be on-site to collect samples and perform monitoring and all asbestos management work, including excavation of ACM, will be conducted by a MDH/AHERA-licensed Asbestos Contractor.

### 2.2 Site Security

The Asbestos Contractor will be responsible to restrict unauthorized entry to the work spaces (exclusion zones) during asbestos management activities. The Site will be restricted to only allow authorized, trained and protected personnel on a twenty-four (24) hour basis. Authorized personnel

may include the employees of subcontractors, owner employees and representatives, state and local inspectors and other designated individuals. Warning signs will be posted at all entrances or exits from exclusion zones in the event that ACM is identified. The warning signs will comply with OSHA and Minnesota Department of Health (MDH) regulations compliance with all other federal, state and local requirements.

A list will be posted containing the names, addresses, telephone numbers of the contractor, retained Safety Officer, or any other personnel who may be required to assist during abatement activities.

## **2.3 Asbestos Management Activities**

During investigation and remediation or redevelopment actions at the Site, it is anticipated that three levels of work tasks will be conducted. The typical work tasks, training, notification, and control measures associated with each level are described below:

### **Level One**

- Includes the installation of borings, augers, and wells and test pitting within areas without debris.
- All workers on-site will be required to take an Asbestos Awareness course conducted by the University.
- A “Notification of Asbestos Related Work” will not be submitted to the MPCA Asbestos Program.
- An Asbestos Inspector will be on-call to respond if potential ACWM are encountered.
- If ACWM is encountered, the material will be wetted with a soap and water solution and covered with plastic sheeting and the location will be marked for follow-up by an Asbestos Inspector.

### **Level Two**

- Includes test excavations, clearing, moving heavy equipment, and dozing activities in areas with known buried debris during the investigation activities.
- All workers on-site will be required to take an Asbestos Awareness course conducted by the University.
- An Asbestos Inspector will be on-site during all activities.



- A “Notification of Asbestos Related Work” will be completed and submitted to the MPCA Asbestos Program within 10 working days of project work.

### **Level Three**

- Includes any activity that disturbs the ground surface in areas with known presence of buried ACM debris, including excavations, dozing, moving heavy equipment, and remedial actions.
- All workers on-site will be required to take an Asbestos Awareness course conducted by the University.
- An Asbestos Inspector will be onsite to during all excavation activities.
- A “Notification of Asbestos Related Work” will be completed and submitted to the MPCA Asbestos Program within 10 working days of project work.
- All excavation activities will be conducted by an Asbestos Contractor including excavation of soil and debris for offsite disposal or onsite reconfiguration.

All potential ACM will be wetted to minimize asbestos fiber release during Level Two and Level Three activities. Water will be applied at the excavation, loading, and backfill areas unless weather conditions provide adequate moisture to prevent dust and fiber release. The water will be applied from an on-site sprinkler system or a water truck using a low-pressure sprayer to ensure, to the extent possible, that spraying activities will not cause asbestos fibers to become airborne. Section 40 CFR 61.145(7) allows for the suspension of wetting operations due to freezing temperatures. During periods when wetting operations are suspended due to freezing temperatures, the Asbestos Contractor will record the temperatures near the excavation area at the beginning, middle and end of each workday. The daily records will be maintained on site during the project and be retained for two years.

All stockpiles containing suspected ACM will be placed on tarps or plastic sheeting and constructed within the zone of contamination. At the end of each working day, potentially asbestos-containing excavated materials will be covered with plastic sheeting, covered with at least six inches of clean soil, or will be wetted periodically over nights/weekends as necessary to maintain adequate moisture to control emissions.

## 2.4 Air Monitoring

Monitoring for airborne asbestos fibers will be conducted during activities described in this ECP, in accordance with Minnesota and Federal OSHA requirements. Each contractor will be responsible for their own employee's personal monitoring. The specific monitoring plan will be developed in the contractor's Site Safety Plan.

## 2.5 Transport/Disposal

ACM to be transported off site will be loaded into plastic-lined trucks and covered to control dust during transport. Transport vehicles will have asbestos signage displayed during loading and unloading operations. All transport vehicles will be inspected and any loose soil on the exterior of the vehicle or tires will be removed. Spilled or tracked materials will be cleaned from public roadways on a daily basis. ACM disposal will be at an approved landfill that is permitted to accept ACM as part of their Solid Waste Management Plan. A list of disposal facilities will be developed by the excavation contractor prior to the work.

Each load or stockpile will be sufficiently wetted or covered to minimize release of asbestos fibers during transport and movement of soil with potential ACM around the Site. Loads will not be unloaded manually. The load will be allowed to slide slowly from the truck box or excavation equipment at the designated area. At the end of each day or work shift in the dump area, truck boxes and earthwork buckets will be decontaminated by rinsing with water. The decontamination water will be collected and re-used to re-wet the excavation area, as needed.

## 2.6 Reporting

The Asbestos Contractor will maintain: (1) security and safety logs showing names of the persons entering the work space, date and time of entry and exit, record of any accident, emergency evacuations, and any other safety and/or health incident (2) daily work reports on all abatement activities by the Asbestos Contractor. Such reports shall include mention of all matters necessary to be accomplished in order to assure the satisfactory completion of all asbestos abatement work.