Cambridge Public Health Department
Cambridge Health Alliance

119 Windsor Street • Ground Level • Cambridge, MA 02139
617.665.3800 • Fax 617.665.3888

To: Robert W. Healy, City Manager
From: Harold Cox, Chief Public Health Officer
Re: Response to Council Order # (W.R.Grace follow up)
Date: October 10, 2001

The Cambridge Public Health Department has now issued a final decision regarding Utility Trench work on W.R. Grace property. This decision was posted as a draft on August 2, 2001 after participation in a session of the Neighborhood and Long Term Planning Committee of the Cambridge City Council on July 24, 2001 at the Banneker School in North Cambridge. This Final Decision was placed in the public repository at the Main Branch of the Cambridge Public Library and was followed by a 20 calendar-day public comment period. The Cambridge Public Health Department is herein submitting the following related documents:

- the Draft and Final Decisions regarding this proposed trench work;
- the public comment received during the comment period;
- a copy of the W.R. Grace notification indicating the availability of the Final Decision and their intention to initiate excavation during the week of October 9, 2001 and;
- a copy of the minutes of the Neighborhood and Long Term Planning Committee meeting held on July 24, 2001.

As previously announced, W.R. Grace is proceeding with their excavation later this week. As of this writing the preparations will continue until Thursday, 10/11 and digging will then commence on Friday, 10/12. The Cambridge Public Health Department will be inspecting the work site before excavation begins in coordination with a community representative and a Licensed Site Professional (LSP) chosen by this department. We will examine the sufficiency of the environmental control measures (tents, fences, wetting techniques) and the air monitoring practices Grace has committed to in their Asbestos Soil Management Plan and Addendum Plan (May and August, 2001).

Cambridge Public Health Department
Cambridge Health Alliance

1493 Cambridge Street • Cambridge, MA 02139
617.498.1480 • Fax 617.498.1514

September 19, 2001

Mr Robert F. Jenkins, Vice President Engineering & Manufacturing Support
W.R. Grace & Company - CONNECTICUT
62 Whittemore Avenue
Cambridge, MA 02140

FINAL DECISION REGARDING UTILITY TRENCH EXCAVATION

Dear Mr Jenkins,

The Cambridge Public Health Department has reviewed all public comments and all responses provided by W.R. Grace as of September 17, 2001. The conditions under which excavation of the previously described Utility Trench may be conducted will conform to the provisions stated in the Draft Decision Regarding Utility Trench Excavation (August 2, 2001) reproduced at the end of this document with the following additional condition to be required: The placement of two airborne monitoring locations at predetermined "upwind" and "downwind" locations must be configured to allow perimeter coverage regardless of wind direction. In order to assure full coverage of this "L-shaped" trench it will be necessary to allow one of the two perimeter monitoring locations to be movable during work on the "hooked" portion of the trench. This will allow at least one device to be "downwind" at all times regardless of the wind direction and in the event of a breach in the tented structures. Once work on this lateral portion of the trench has been completed then fixed monitoring may be used for the remainder of the project.

Comments received by this department raised several issues, some procedural and others logistic or technical. The issue of primary concern to this department is the selection of appropriate trigger levels to cause suspension of operations and employment of additional mitigation measures. The selection of a very low, but positive, trigger level for real-time fiber monitoring (0.02 PCM-determined fibers/cc) was appropriately derived on the basis of state Department of Environmental Protection (DEP) guidance. In consideration of the requirement to impose "negative air" tenting over this trench and the inability of the real-time devices to distinguish between asbestos and other fibers, this trigger level is inherently conservative. Furthermore, the EPA comments that indicate that a trigger-level should be set "*using the detection limit of the available analytic standard*" would not guarantee a detection limit as low as 0.02 fibers/cc. In its final approval the DEP has indicated that this trigger level is fully protective.

Comments specifically questioning full procedural compliance with the Massachusetts Contingency Plan (MCP) and the state Public Involvement Process (PIP) are not the jurisdiction of this department.

Sam Lipson
Director of Environmental Health
Cambridge Public Health Department
City of Cambridge 617-665-3838

August 2, 2001

Mr Robert F. Jenkins, Vice President Engineering & Manufacturing Support
W.R. Grace & Company - CONNECTICUT
62 Whittemore Avenue
Cambridge, MA 02140

Re: DRAFT DECISION REGARDING UTILITY TRENCH EXCAVATION

Dear Mr Jenkins,

The Cambridge Public Health Department is issuing this draft decision in order to establish the dust and airborne asbestos mitigation measures required under the Asbestos Protection ordinance by the responsible party, W.R. Grace, during utility trench excavation on its property at 62 Whittemore Avenue in Cambridge. This department also acknowledges receipt of explanatory documentation sent by representatives of W.R. Grace on Friday, July 27, 2001 regarding the nature of the Utility Trench work proposed. This excavation work was previously described in the Final Utility Trench Excavation Release Abatement Measure (RAM) Plan/Asbestos Soil Management Plan (ASMP) submitted in May 2001, but further details were solicited in order to determine whether the "underground utility maintenance" exemption in the Asbestos Protection ordinance should apply.

A review of the history and placement of the power, telecommunications, air, gas, sprinkler, and steam utilities described by the responsible party suggests that the extant underground utility corridor has been in place for several decades. It is also apparent that outdated electrical power lines do need to be replaced and that best engineering practices and basic safety considerations impose limitations on the placement of these lines above ground. Though above-ground placement of these 13,000-volt power lines can be carried out safely, some potential hazards would nevertheless be introduced by this configuration (e.g. risk of lightening strikes) and significant soil disturbance would be required in the construction of a pole line along this corridor for necessary support. Above-ground construction does not appear to be the best option for such high-powered lines and, furthermore, concerns about disruption of contaminated soil would not be eliminated if this approach were taken.

While the precise meaning of terms such as "upgrade" and "maintenance" can be debated without resolution, I believe the work described meets both definitions in some measure. Antiquated lines do represent an ongoing safety concern, but the increased capacity being introduced is clearly part of a larger modernization program intended to augment the capacity of the buildings now served by these power lines. I view the exemption language in the local ordinance as an attempt to balance immediate safety concerns associated with disturbance of soil on an asbestos-contaminated site against the potential hazard of delaying urgently needed utility repairs and maintenance. It seems apparent that this upgrade work does need to be completed within a reasonable period of time, but it also seems clear that full compliance with the Asbestos Protection ordinance would not interfere with the expeditious completion of this work or jeopardize public safety. Presumably this upgrade work could have been completed at any point in the past several years and was not carried out until now because it did not previously coincide with plans to expand the use of several older buildings. In short, the importance of this upgrade/maintenance work is quite clear and the rationale for placing these lines underground is

strong, but neither the urgency implied by the emergency exemption provision nor the limited scope of work suggested by the maintenance exemption has been convincingly demonstrated.

The discretionary nature of both the emergency repair and maintenance exemptions, I believe, clearly underscores that the ordinance was primarily written to provide protection from release of airborne asbestos. Given the history of contamination on this site and the absence of emergency conditions at this time I do not believe it is appropriate to grant this work an exemption from the provisions of the Asbestos Protection ordinance under discretionary powers assigned to this department. As a consequence of being located within 500 feet of a residential property one of the conditions specified within the ordinance as a trigger for further controls has been met. Therefore this work and all other "soil disturbing activities" on this property (as defined within the ordinance) requires one of the following mitigation measures in addition to those monitoring and mitigation measures already included in the Asbestos Soil Management Plan submitted in May 2001:

- *covering the site with a layer of clean fill, which must be of sufficient depth such that the proposed disturbance of the soil would occur in and affect only that clean fill layer or;*
- *erecting a permanent or temporary structure maintained at partial vacuum sufficient to contain all fugitive dust, with off gas from the evacuation system treated with HEPA filtration.*

Accordingly, please provide to me and to the public repository at the Main Branch of the Cambridge Public Library a revised Asbestos Soil Management Plan incorporating one or both of these additional control measures. Please contact me if you require further clarification regarding this matter. This draft decision will immediately be placed in the public repositories and will remain there for no less than 20 days after the revised Asbestos Soil Management Plan is available for public review and comment. A final decision will be issued thereafter.

Sincerely,

Sam Lipson
Director of Environmental Health
Cambridge Public Health Department
City of Cambridge
617-665-3838

cc: Margaret Drury, City Clerk

W.R. Grace response to public comment - 9/9/2001

9 September 2001
File No. 10063-066

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
205A Lowell Street
Wilmington, Massachusetts 01887

Attention: Mr. Jack Miano

Subject: Response to GEO Insight Comments
Final Utility Trench RAM
W.R. Grace & Co.-Conn
Cambridge, MA
RTN 3-0277

Ladies and Gentlemen:

As requested by W. R. Grace & Co.-Conn., this letter provides our response to concerns raised by GEO Insight in their letter of 7 June 2001 relative to the Final Utility Trench RAM Plan for the subject site. GEO Insight, on behalf of the Alewife Neighbors, Inc. (ANI), has provided the Department with comments on the Final Utility Trench RAM. In general, they suggest that the assumption of an Imminent Hazard (IH) condition for the derivation of the boundary monitoring point criteria is inappropriate.

In their first bulleted item, GEO Insight suggests that the exposure assumption should not be limited to six months if the IH criteria is to be used as an action level. They argue that it is not possible to determine this exposure period given the assumption that there have been past intrusive activities and that future intrusive activities could expose a person for more time than that assumed in the calculation. First it is a speculation that there has been any exposure as relates to any past soil disturbing activities and as to any future soil disturbing activities the same will be carried out subject to a RAM appropriate to the activity. In any event, GEO Insight does not acknowledge that for their concern to be realized, the resident would need to remain at the monitoring point location for the assumed 6 month or other assumed time period. It is not likely that the resident will remain at the location of the boundary monitoring point for the assumed ten-hour day, never mind a one-week or six-month period. Further, given the exposure mitigation measures to be put into place there will likely be no actual exposure to anyone let alone any actual exposure to residents.

The monitoring points will be chosen based on the configuration of the construction activity to be undertaken and the prevailing wind direction. They will be located at the limit of the work zone, between the work area and the nearest residence. The monitoring results will be used to

trigger more aggressive control of dust and/or fibers. It is unlikely that a measurable amount of asbestos fibers will be generated in the work zone and more unlikely that fibers would be present in the indoor air of the nearest residence, some 300 feet away. Therefore the assumptions used to derive the IH criteria are already considered to be extremely conservative and there is no need to increase the assumed exposure period.

The second bullet requests the specific calculations used to derive the average daily exposure be provided. The imminent hazard calculation is explained in detail in Appendix C of the AAMMP. The calculations are provided below:

Inhalation Potency for Asbestos (EPA estimate)	**0.23 per PCM fi/cc**
For continuous life time exposure:	
Allowable Ambient Limit **(AAL)**	**4E -6 PCM fi/cc**
Corresponding **Lifetime Risk**	**1E -6**

310 CRM 40.953(1) of the MCP requires that "The short period of time considered in the evaluation shall be five years unless site circumstances indicate that a shorter time period is appropriate. The six month period proposed here corresponds to a total active period of:

26weeks x 5 d/wk x 10hr/d x 1d/24 hours	**54.2 days**
Imminent Hazard: Excess Lifetime Cancer Risk is greater than or equal to 1 in 100,000.	
For 54.2 day period the air concentration corresponding to 1 in 100,000 =	**0.02 fi/cc**

In the third and following bullets, GEO Insight proposes the use of the Critical Exposure Pathway (CEP) concept to support an argument that the criteria to be used at the monitoring points should be no increase in exposure, regardless of risk. Again, their suggestion to use the CEP criteria is not supported by the conditions existing in the work zone. There will be no residents living at the monitoring points. The CEP approach is specifically designed to address those situations where exposure is occurring from vapor phase emissions entering a building or concentrations in drinking water. In the proposed trench excavation, there is no opportunity for a true CEP to exist because response actions will be initiated based on the proposed IH criteria before residential exposures would be possible. Likewise, as this is a construction project, it is not appropriate to assume that there would in absolute terms be no increase in fiber or dust levels. However, the AAMMP does provide an approach designed to supplement the data from the boundary monitoring points and mitigate increases in these parameters through the use of real-time data. The real-time data approach will add an additional level of conservatism by basing decisions for increased mitigation measures on short term (measured in hours) excursions from the criteria which was developed as an average exposure concentration over a six month period.

Please do not hesitate to contact us with questions.

Sincerely yours,
HALEY & ALDRICH, INC.

Melissa McEwen
Staff Environmental Geologist

William W. Beck, LSP
Senior Vice President

c: W.R. Grace & Co.-Conn; Robert Jenkins

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COMMENTS/RESPONSES PERTAINING TO THE ADDENDUM TO FINAL UTILITY TRENCH EXCAVATION RAM PLAN/ASMP

Comments provided by Michael Nakagawa on 3 September 2001:

The following is a summary of the individual comments provided by the commenter. A response follows each comment.

1. **Alewife Neighbors request that you conform to the AAMMP by providing monitoring that can be relocated based on prevailing wind direction at the time of the soil disturbing activities.**

   Because the soil disturbing activities are to be conducted within an enclosure under negative air pressure and real-time dust and fiber monitoring will be undertaken inside and outside the enclosure, fixed locations will be used for the more traditional perimeter monitoring.

   The use of the RAM to modify requirements of the AAMMP is clearly allowed. As referenced in one Page 1 of the AAMMP, "when soil disturbing activities are planned at the Site, a RAM Plan will be prepared, as applicable, and the AAMMP will be referenced and attached to the RAM for descriptions of soil management and monitoring techniques to be implemented during the soil disturbing activity." In other words, if a particular soil disturbing activity is being conducted under the MCP, the RAM Plan overrides the AAMMP and describes the procedures to be undertaken at the Site and, as applicable, the provisions of the AAMMP to be applied at the Site. As further stated one Page 1 of the AAMMP, "if a RAM Plan is determined to be unnecessary for a specific soil disturbing activity, the AAMMP will be followed as appropriate to the specific activity." Thus, the AAMMP only serves as the proposed plan when the proposed soil disturbing activity does not fall under the MCP.

   Since the proposed utility trench is being conducted as a RAM activity in accordance with the MCP, the scope of work in this Addendum and the Final Utility Trench RAM Plan override the specific monitoring established in the AAMMP. Haley & Aldrich has proposed to conduct stationary air sampling at the perimeter of the work zone at one location "upwind" and one location "downwind" of the structure. The work inside the structure will be conducted under negative air pressure. Real-time fiber and dust monitoring will be conducted inside the structure, as well as at the exhaust point of the ventilation system for the structure. The perimeter monitoring is considered an additional precaution and will thus be conducted at fixed locations.

2. **Since the AAMMP is integral to the RAM Plan/ASMP, the RAM Plan/ASMP cannot be considered completed until the AAMMP meets the requirements of the MCP (310 CMR 40.1405(6). Since the Draft Addendum refers to the Original RAM Plan/ASMP, those previously submitted comments (7 June 2001 GeoInsight Letter and 17 July 2001 GeoInsight letter) should be included as a part of the PIP in regard to the full Utility Trench Excavation project, and in particular this opportunity for public comment.**

   The AAMMP has met the requirements of the PIP process, as outlined in the MCP under 310 CMR 40.1405(6). Public comments on the draft version of the AAMMP were accepted from 22 April 1999 to 7 July 1999. Written comments received on the draft AAMMP during the comment period, as well as comments received during a 17 June 1999 public meeting to discuss the plan, were responded to and included in Appendix C of the AAMMP dated April 2001. The

MCP indicates that a response is required for only those comments received during the public comment period. The AAMMP includes responses to those comments received during the April to July 1999 comment period. Applying concepts in the AAMMP to the proposed utility trench excavation does not re-open the AAMMP for public comment. Similarly, the public comment period for the Addendum to the Final RAM Plan/ASMP applies to only the Addendum document. The comment period for the Final RAM Plan/ASMP extended from 10 October 2000 to 30 October 2000. The addendum document does reference the May 2001 Final RAM Plan/ASMP, however that does not re-open the comment period on that document.

With that said, in order to adequately address the concerns of the community we have prepared responses to two GeoInsight letters received after the comment period closed commenting on the Final RAM Plan/ASMP (7 June 2001 letter to the DEP) and on the AAMMP (17 July 2001 letter provided to the ANI). A copy of 7 June 2001 GeoInsight letter and Haley & Aldrich's response to that letter (dated 9 September 2001) is included at the end of this Appendix.

A copy of the 17 July 2001 GeoInsight letter is also included in this Appendix. Our response to the comments provided in that letter is as follows:

Use of Critical Exposure Pathway (CEP)

GEO Insight proposes the use of the Critical Exposure Pathway (CEP) concept to support an argument that the criteria to be used at the monitoring points should be no increase in exposure, regardless of risk. The use of the CEP criteria is not supported by the conditions existing in the work zone. There will be no residents living at the monitoring points. The CEP approach is specifically designed to address those situations where exposure is occurring from vapor phase emissions entering a building or concentrations in drinking water. In the proposed trench excavation, there is no opportunity for a true CEP to exist because response actions will be initiated based on the proposed IH criteria before residential exposures would be possible. Likewise, as this is a construction project, it is not appropriate to assume that there would in absolute terms be no increase in fiber or dust levels. However, the Addendum, the Final Trench RAM Plan/ASMP and the AAMMP together do provide an approach designed to supplement the data from the boundary monitoring points and mitigate increases in these parameters through the use of real-time data. The real-time data approach will add an additional level of conservatism by basing decisions for increased mitigation measures on short term (measured in hours) excursions from the criteria which was developed as an average exposure concentration over a six month period.

AAMMP Stop Work/Upgrade Criteria Contradictions

The sentence of the final paragraph of Appendix C of the AAMMP states that "if analytical results exceed the IH criteria, airborne fiber management techniques used at the Site will be upgraded." This is consistent with the statements on Page 13 of the AAMMP (work zone response criteria): "for the first day of soil disturbing activities, monitoring data will be compared to the IH criteria assuming all detected fibers are regulated asbestos fibers. Exceeding the criteria will result in increased dust control measures." This is also consistent with Page 12 of the AAMMP (perimeter response criteria): "PCM analytical data collected daily from perimeter stationary air sampling units will be compared to the calculated MCP site-specific Imminent Hazard (IH) level for the Site of 0.02 PCM regulated fibers/cc...The IH level represents the concentration of asbestos fibers in air that, if exceeded, will require upgrade of airborne fiber management techniques used at the Site." It is the intention of the AAMMP to use real time data and base decisions on stopping work on criteria developed in the initial days of soil disturbing

activities as presented on Page 13. The reading of the last sentence of the second paragraph of the first page of Appendix C should not imply a different criteria. Page 13 of the AAMMP (work zone response criteria) clearly describes how the fiber data will be used in conjunction with the perimeter monitoring samples.

Page 14 of the AAMMP clearly describes the fiber management upgrade techniques to be employed at the Site: "Increased techniques, including the use of a higher volume of water sprayed on the excavation, modifications in the excavation approach, the use of wind fences, the use of additives with the water, will be used throughout the remaining duration of the soil disturbing activity when fill soil is being handled."

EPA Perimeter Monitoring Guidelines

The utility trench excavation is being conducted as a Release Abatement Measure (RAM), in accordance with the provisions of the MCP. This excavation is subject to the provisions and criteria set forth in the MCP and the Cambridge Asbestos Ordinance. Appendix C of the Final RAM Plan/ASMP includes our response to Mary Ellen Stanton's comments from 30 October 2000. As indicated in our response, "air monitoring will be conducted at the Site in accordance with the AAMMP and the Ordinance." The DEP, in accordance with the MCP, has suggested a way to derive an action level at the site that is different from the action level proposed by the EPA. This excavation is subject to the provisions and criteria set forth in the MCP and the Cambridge Asbestos Ordinance. Therefore we will not and are not required to use EPA's guidance. The criteria triggering actions were clarified in the AAMMP as a result of Ms. Stanton's comments. In addition, the use of real-time monitors provides more applicable data than traditional upwind and downwind air monitors. Further, the excavation work at the site is now being conducted inside of a structure maintained at negative pressure.

Comments pertaining to use of temporary structure

These comments are not longer relevant as the Utility Trench Excavation is proposed to occur inside of a structure.

City Request for Contingency Plan

Since the 7 July 1999 letter from the City of Cambridge, the City passed an Asbestos Protection Ordinance intended to establish the procedures to be followed in the event of a measured release of asbestos on a Site, i.e. an Asbestos Soil Management Plan (ASMP). The AAMMP by itself is NOT intended to be a "contingency plan" nor an Asbestos Soil Management Plan (ASMP). A separate ASMP, in the form of a modified MCP RAM Plan, has been prepared to satisfy the requirements of the City's Asbestos Ordinance and the City's request for a contingency plan.

Unforeseen Conditions Plan and Need for Additional Characterization

Environmental Health & Engineering (EHE) in their 1999 comments points out that localized areas of bulk asbestos could be exposed during excavation. It was not at that time and still is not reasonable to conduct additional characterization designed to locate caches of asbestos, if present at the site.

As indicated in our response to EHE (Page 14 of Appendix A of the AAMMP), 345 locations were tested for asbestos as a part of our December 1998 characterization program and no such deposits were found to exist to depths of 4 ft below ground surface at a majority of sample locations. Subsequent to EHE's comments additional testing was conducted in the trench area, in accordance with the Cambridge Asbestos Ordinance. Eighteen borings were completed in the trench area. Asbestos was not detected in the 18 samples submitted for analysis for asbestos. Visual evidence of caches of asbestos was not encountered. Historically, the area of the utility trench was a part of a railroad spur. Based on historical use and sampling results, there is no reason to suspect that bulk asbestos will be found during the trench excavation.

The airborne asbestos soil management procedures outlined in this Addendum, in the applicable provisions of the Final RAM Plan/ASMP and the AAMMP are applicable to an asbestos soil management program regardless of whether the asbestos is in fibrous or bulk form. If bulk asbestos were found during the Utility Trench Excavation, the same management, monitoring, upgrade and work-stoppage procedures outlined in these documents would be applied to the situation and would be sufficient to address the potential exposures. If bulk asbestos were found during the excavation, additional characterization would be planned and conducted subsequent to the completion of the RAM activities.

AAMMP does not meet PIP Requirements in 310 CMR 40.1406(6)(f) and (g)

This statement is not correct. The AAMMP meets the requirements of the PIP process, as outlined in the MCP under 310 CMR 40.1405(6). Public comments on the draft version of the AAMMP were accepted from 22 April 1999 to 7 July 1999. Written comments received on the draft AAMMP during the comment period, as well as comments received during a 17 June 1999 public meeting to discuss the plan, were responded to and included in Appendix C of the AAMMP dated April 2001.

3. **Alewife Neighbors requests that you provide the original public comments to the Original RAM Plan/ASMP in the final Addendum Report.**

The comments, as well as the responses previously provided in Appendix C of the Final RAM Plan/ASMP, for the RAM Plan/ASMP have been included in Appendix D of the Addendum to the Final RAM Plan/ASMP.

4. **It is suggested that the effects of possible future projects be formally considered as part of the AAMMP.**

The public comment period for the Addendum to the Final RAM Plan/ASMP applies to only the Addendum document. The comment period for the Final RAM Plan/ASMP extended from 10 October 2000 to 30 October 2000. The addendum document does reference the May 2001 Final RAM Plan/ASMP, however that does not re-open the comment period on that document.

With that said, in order to adequately address the concerns of the community we have prepared responses to the GeoInsight letter commenting on the Final RAM Plan/ASMP dated 7 June 2001. A copy of 7 June 2001 GeoInsight letter and Haley & Aldrich's response to that letter (dated 9 September 2001) is included at the end of this Appendix.

5. **Alewife Neighbors Requests that tunneling technology be considered.**

As discussed in Responses to Sue Hall and David Bass (Appendix C of the Final RAM Plan/ASMP) the use of Trenchless Technology is not appropriate for the utility installation to be conducted at the Site. The existing utility corridor has numerous underground utilities (including natural gas) that are currently servicing various buildings at varying depths and cross section. The use of Trenchless Technology (i.e horizontal boring) to avoid these services would be an enormous task. Additionally, a trenchless approach is complicated by the fact that concrete encasing is a code requirement for all high voltage feeders.

Therefore tunneling will not be used.

COMMENTS/RESPONSES PERTAINING TO THE ADDENDUM TO FINAL UTILITY TRENCH EXCAVATION RAM PLAN/ASMP

Comments provided by the Department of Environmental Protection on 10 September 2001:

The following is a summary of the individual comments provided by the commenter. A response follows each comment.

1. **DEP requests that the following be incorporated into the Addendum to the Final Utility Trench Excavation RAM Plan/ASMP: 1) use of double lined 10 ml bladder bags in the trucks used to transport the potentially asbestos contaminated soils; 2) that the Occupational Safety & Health Administration (OSHA) requirements should be followed.**

Haley & Aldrich will incorporate the DEP request to use double line 10 ml bladder bags and to follow the requirements of OSHA into the final Addendum to the RAM Plan/ASMP. Haley & Aldrich has contacted OSHA and will follow the appropriate regulations during the utility trench project. OSHA requested that work begin in Level C PPE and downgrade to Level D PPE. This request will be followed and has been incorporated into the final Addendum to the RAM Plan/ASMP.

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cambridge 2001

CITY OF CAMBRIDGE • EXECUTIVE DEPARTMENT

Robert W. Healy, City Manager *Richard C. Rossi, Deputy City Manager*

November 5, 2001

To The Honorable, The City Council:

Please find attached Awaiting Report Item No. 01-207, regarding a report on proposed trenching project at W.R. Grace, received from Chief Public Health Officer Harold Cox.

Very truly yours,

Robert W. Healy
City Manager

RWH/mec
Attachment

795 Massachusetts Avenue, Cambridge, Massachusetts 02139 Voice: 617.349.4300 Fax: 617.349.4307 TTY: 617.349.4242 Web: www.ci.cambridge.ma.us

Cal 3
11/05

Consent Agenda #9

Awaiting Report Item Number 01-207, regarding a report on the proposed trenching project at W.R. Grace.

In City Council November 5, 2001

Charter Right Exercised by Councillor Decker

On City Council November 19, 2001 Placed on File under Rule 19 of the City Council Rules.