

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Tuesday, February 17, 2015 4:35 PM
To: D'Sa, Christopher P (Chris)
Cc: Roe, Dilan, Env. Health
Subject: Fuel Leak Case RO0000039, Roadway Express, 1708 Wood St., Oakland, CA

Chris,

Upon further evaluation of the case file, your existing SMP is sufficient for the western portion of the property identified as Assessor's Parcel Number (APN) 7-563-1, having the physical address of 1711 18th Street. Elevated metal concentrations have only been identified on the eastern parcel, 1708 Wood Street, APN 7-562-1. Therefore the following SMP comments pertain only to the eastern parcel. Your updated SMP should be written to reflect this fact. Please incorporate the following concept in your revised SMP.

Thank you for your patience in this matter.

Keith Nowell

SMP concept-

Not all contamination present on Assessor's Parcel Number (APN) 7-562-1 is identifiable by visual or odiferous means or through field screening with the use of a PID. Any excavation that occurs at the site, unless otherwise delineated by physical testing of appropriate scope and breadth, should be assumed to be contaminated. Therefore, site control is required through the use of a Site Management Plan (SMP) to minimize potential contamination exposure of workers and to protect the public from site hazards during activities associated with site preparation (e.g. staging) and excavation. Additionally, the SMP establishes decontamination procedures for both personnel and equipment.

The SMP requires all contractors performing subsurface work to prepare a site specific Health and Safety Plan (HSP) that outlines the scope of work, the location of the work to be performed, and identifies the anticipated physical and chemical hazards that may be encountered. The HSP is to be prepared prior to the initiation of subsurface work. The HSP will identify personnel and level of PPE required for site workers, the command structure, safety meeting information (including topics, frequency, and sign-ins), establish perimeters of the work zones identified in the SMP, establish site security measures, and identify locations to receive excavation spoils and groundwater. The HSP will identify the appropriate level of HAZWOPER training required for personnel to perform their duties outlined in the scope of work.

The mechanism the SMP utilizes to reduce worker and public exposure to chemical and physical hazards is through the use of work zones to restrict access (minimize exposure) to potentially hazardous levels of contamination and through the use of personal protective equipment (PPE) appropriate to the potential hazard. The work zones outlined in the SMP are the *Exclusion Zone*, *Contamination Reduction Zone*, and the *Support Zone*. These zones are discussed below.

A brief discussion of the SMP work zones is as follows:

The Exclusion Zone - The Exclusion Zone is where exposure to contamination is or may be present. The primary activities performed in the Exclusion Zone include excavation, sampling, drum staging, and materials bulking/stockpiling. The outer perimeter of the Exclusion Zone should be clearly marked with lines, placards, hazard tape and/or fencing. Access control points to the Exclusion Zone should be established to regulate the flow of personnel and equipment into and out of the zone.

The personnel working in the Exclusion Zone may include the Field Team Leader, the work parties, and specialized personnel such as heavy equipment operators. All personnel within the Exclusion Zone should wear the level of protection required by the Site Health and Safety Plan (HSP). Within the zone, different levels of protection may be justified based on the degree of hazard present. The level of personal protection required should be specified in the HSP.

Contamination Reduction Zone (CRZ) – This zone is the transition area between the contaminated area and the clean area. The boundary between the Exclusion Zone and the CRZ is called the Contamination Control Line or Hot

Line. Decontamination procedures for both personnel and equipment begin at the hot line and should be completed prior to exiting the CRZ. The outer perimeter of the CRZ should be clearly marked with lines, placards, hazard tape and/or fencing. Access control points should be established to regulate the flow of personnel and equipment into and out of the CRZ.

Personnel entering the CRZ are required to wear the personal protective clothing and equipment prescribed for working in the CRZ. To reenter the Support Zone, workers should remove any protective clothing and equipment worn in the CRZ, and leave through the personnel exit Access Control Point. The personnel stationed in the CRZ are usually the Site Safety Officer, a Personnel Decontamination Station (PDS) Operator, and any emergency response personnel. Additional personnel may assist the PDS Operator by conducting decontamination procedures for sample containers and equipment.

Support Zone – The Support Zone is clean area of the site where no exposure to contamination at the site is anticipated. Personnel in the Support Zone may wear normal work clothes. A copy of the HSP and SMP should be kept in this area

Personnel in the Support Zone personnel include the command post supervisor and project team leader, and field team members who are preparing to enter or have exited the exclusion zone. Support Zone personnel are responsible for alerting the proper agency in the event of an emergency. All emergency telephone numbers, evacuation route maps, and vehicle keys should be kept in the Support Zone.

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