

Cambridge Public Health Department Final Decision regarding the Asbestos Soil Management Plan (ASMP) for Construction and Remediation at Russell Field Submitted by the City of Cambridge

May 19, 2004

The Office of Commissioner of Health and Hospitals at the Cambridge Public Health Department has reviewed the proposed soil disturbance and excavation activities proposed at Russell Field in Cambridge, MA. This public park is bounded by the Linear Park, Rindge Avenue, residential properties along Harvey Street, and the W.R. Grace property at 62 Whittemore Avenue. The proposed Asbestos Soil Management Plan (ASMP) was reviewed with respect to its conformity with the Cambridge Asbestos Protection Ordinance. Evaluation of this ASMP will be based upon the results of the previously approved Soil Sampling Plan, the documented historic use of the portion of the property to be disturbed, a detailed air monitoring plan, and other protective measures to be employed during soil disturbing activities on the site.

Soil samples were composited over various strata throughout the topsoil to a depth that might be disturbed during future construction proposed for Russell Field. These samples were taken at on-center intervals of between 35.0 and 37.5 feet (as previously agreed upon) and were submitted for asbestos analysis using the EPA Region 1 Protocol for Determining Asbestos Content in River Sediments and Soil Samples ("EPA Protocol") combined with Polarized Light Microscopy (PLM) detection. Between 1998 and 2003 there were over 1,000 discreet samples collected on from the soils in Russell Field and the adjacent Comeau Field (a baseball diamond). These samples were analyzed to reveal four (4) locations with asbestos at 1% or greater in soil (2-11% by the River Sediment Method)). The data summary is included in the Asbestos Soil Management Plan and a more detailed summary of results is available for review at the public repositories.

This ASMP details protocols for 'tenting and venting' with HEPA-filtered exhaust, decontamination procedures for equipment and personnel exiting the work site, air monitoring within the containment structure, perimeter air monitoring, protocols for dust suppression, and management of soil as it is excavated and removed from the property --without stockpiling, and other measures to protect those working on the site and those living in the surrounding neighborhood.

Air monitoring procedures will evaluate the presence and concentration of total particulates, total fibers (asbestos and non-asbestos), asbestos, and volatile organic compounds (VOCs). In addition, surface wipe tests and visual inspection will be carried out to augment air monitoring within the tent structures. The clearance air samples, as indicated in the ASMP, must be below the *Massachusetts Department of Labor and Work Force Development* standard of 0.010 fibers per cubic centimeter in order for a tented area to be declared free of asbestos.

Confirmatory soil samples will be collected, at a minimum, one composite sample from each side of an excavation and one composite sample from the bottom of each excavation. The maximum bottom area to be composited will be 10 x 10 feet. Any larger excavation will result in a second

composite sample for the bottom of that excavation site. All soil sample results must be below 1% asbestos in soil by the required analytic method before that excavation is closed.

Finally, this ASMP includes an appropriate Contingency Plan with action levels established for airborne particulate concentrations (120% of background), airborne asbestos fibers (0.003 fibers/cc above upwind background and assuming an attainable method detection limit of 0.001 asbestos fiber/cc), and total volatile organic carbons (5 parts per million in the breathing zone).

It is understood that the goal of this soil disturbing activity is the removal of those volumes of soil that surround the four (4) locations that have been determined to contain asbestos in soil at values greater than 1% using the required analytical method. Clearance data after this work is completed will be submitted to this department before any consideration to reclassify this site will be considered.

It is the determination of the Director of Environmental Health, serving as the designee of the Commissioner of Health and Hospitals, that the Asbestos Soil Management Plan submitted by the City of Cambridge is in accordance with the minimum provisions of the Asbestos Protection Ordinance.

A public meeting was held on May 5, 2004 to present remediation and soil disturbance activities proposed by the responsible party (City of Cambridge). A commitment to closely review soil containment during future excavation and construction work on this site was made by this office. There were no changes to this Asbestos Soil Management Plan (ASMP) requested during this meeting. Therefore, as the agent of the Commissioner of Health and Hospitals for the City of Cambridge I accept this ASMP as consistent with the requirements of the Cambridge Asbestos Protection Ordinance. Any further request to remove this site from the requirements of the ordinance will need to be accompanied by soil clearance data obtained during and after the removal of soil (a minimum of 10' x 10' to the depth of proposed disturbance) from the four locations shown to contain asbestos fibers at a concentration of greater than 1%.

This letter will be placed in the public repository for viewing at the Main Branch of the Cambridge Public Library

If any interested party has any question regarding these comments please contact me at (617) 665-3838 or slipson@challiance.org.

Sincerely,

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