

Asbestos Emission Control Plan

***UMore Park
Dakota County, Minnesota***

***Prepared for
University of Minnesota***

Revised: July 22, 2009



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1.0 Introduction

This Asbestos Emissions Control Plan (ECP) addresses the potential risks associated with asbestos-containing waste materials (ACWM) that may be encountered during investigation, remediation and redevelopment activities 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 ECP will be available for implementation as a contingency measure in all areas of the Site and will address how ACWM will be managed by Barr staff and subcontractors when it is encountered during environmental investigation, remediation, or re-development activities. The University will be responsible for managing ACWM abatement and related tasks. 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 environmental investigation, remediation, and re-development work is expected to span several years. This ECP will serve as a general plan 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.

2.0 Site Description

UMore Park covers a 5,000+ acre area located in Dakota County, Minnesota. The western portion of UMore Park is used as the University's Agricultural Experiment Station (AES). The eastern portion of UMore Park includes the former Gopher Ordnance Works (GOW). The GOW was used 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. Several of the GOW-era buildings were constructed with transite siding. Transite has been observed on the ground surface in the vicinity of some GOW-era buildings and is likely buried in some places on-site. Additional sources of ACWM may also be present on the site.

3.0 Emission Control Procedures

All asbestos related work will be conducted in accordance with Minnesota and Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements. Asbestos sampling will be conducted by an Asbestos Inspector certified by the Minnesota Department of Health (MDH) under the Asbestos Hazardous Emergency Response Act (AHERA).

3.1 Roles and Responsibilities

Barr field staff are responsible for tasks described under environmental activities - levels one through three. As described below, Barr field staff responsibilities include identifying ACWM encountered during field activities, stopping work, wetting and covering the ACWM, and notifying the University.

The University is responsible for managing ACWM abatement and related tasks including regulatory notifications, site security, air monitoring, transportation and disposal of ACWM.

3.2 ACWM Management during Environmental Investigation/Remediation

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

3.2.1 Environmental Activities – Level One

Level one environmental activities include the installation of borings and monitoring wells, surface soil sampling, and other minimally intrusive investigation activities in areas with no known ACWM.

- The University staff (Sean Gabor) will be notified of the area of investigation two weeks prior to field activities.
- All workers on-site will attend an Asbestos Awareness course conducted by the University.
- An Asbestos Inspector will be on-call to respond if potential ACWM are encountered.
- If ACWM is encountered, all activities in the immediate vicinity of the ACWM will stop, the ACWM will be wetted with a soap and water solution and covered with plastic sheeting, the location of the ACWM will be marked, and the University will be notified. *All potential*

ACWM will be immediately reported to Sean Gabor of the University of Minnesota at 612-875-8857 (cell), 612-625-7547 (office), gabor002@umn.edu.

3.2.2 Environmental Activities – Level Two

Level two environmental activities include the tree clearing, test trenching, and other earthwork activities conducted for investigation, remediation, or re-development purposes in areas of no known ACWM.

- The University staff (Sean Gabor) will be notified of the area of investigation two weeks prior to field 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.
- If ACWM is encountered, all activities in the immediate vicinity of the ACWM will stop, the ACWM will be wetted with a soap and water solution and covered with plastic sheeting, the location of the ACWM will be marked, and the University will be notified. *All potential ACWM will be immediately reported to Sean Gabor of the University of Minnesota at 612-875-8857 (cell), 612-625-7547 (office), gabor002@umn.edu.*

3.2.3 Environmental Activities – Level Three

Level three environmental activities include investigation activities conducted in areas with known ACWM on or beneath the ground surface.

- The University staff (Sean Gabor) will be notified of the area of investigation two weeks prior to field 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 University Asbestos Inspector will be on-call during all activities.

- If ACWM is encountered, all activities in the immediate vicinity of the ACWM will stop, the ACWM will be wetted with a soap and water solution and covered with plastic sheeting, the location of the ACWM will be marked, and the University will be notified. *All potential ACWM will be immediately reported to Sean Gabor of the University of Minnesota at 612-875-8857 (cell), 612-625-7547 (office), gabor002@umn.edu.*

3.3 ACWM Abatement

ACWM abatement activities at the Site will be managed by the University and conducted in accordance with the University's ECP. University staff will make the proper notifications, hire a qualified Asbestos Contractor, and will manage the abatement activities and related tasks.

3.3.1 Site Security

Site security during abatement activities will be conducted in accordance with the University's ECP.

3.3.2 Air Monitoring

Air monitoring will be conducted in accordance with the University's ECP.

3.3.3 Transport/Disposal

ACWM will be transported and disposed in accordance with the University's ECP.

3.3.4 Reporting

Reporting shall be completed in accordance with the University's ECP.

Figures

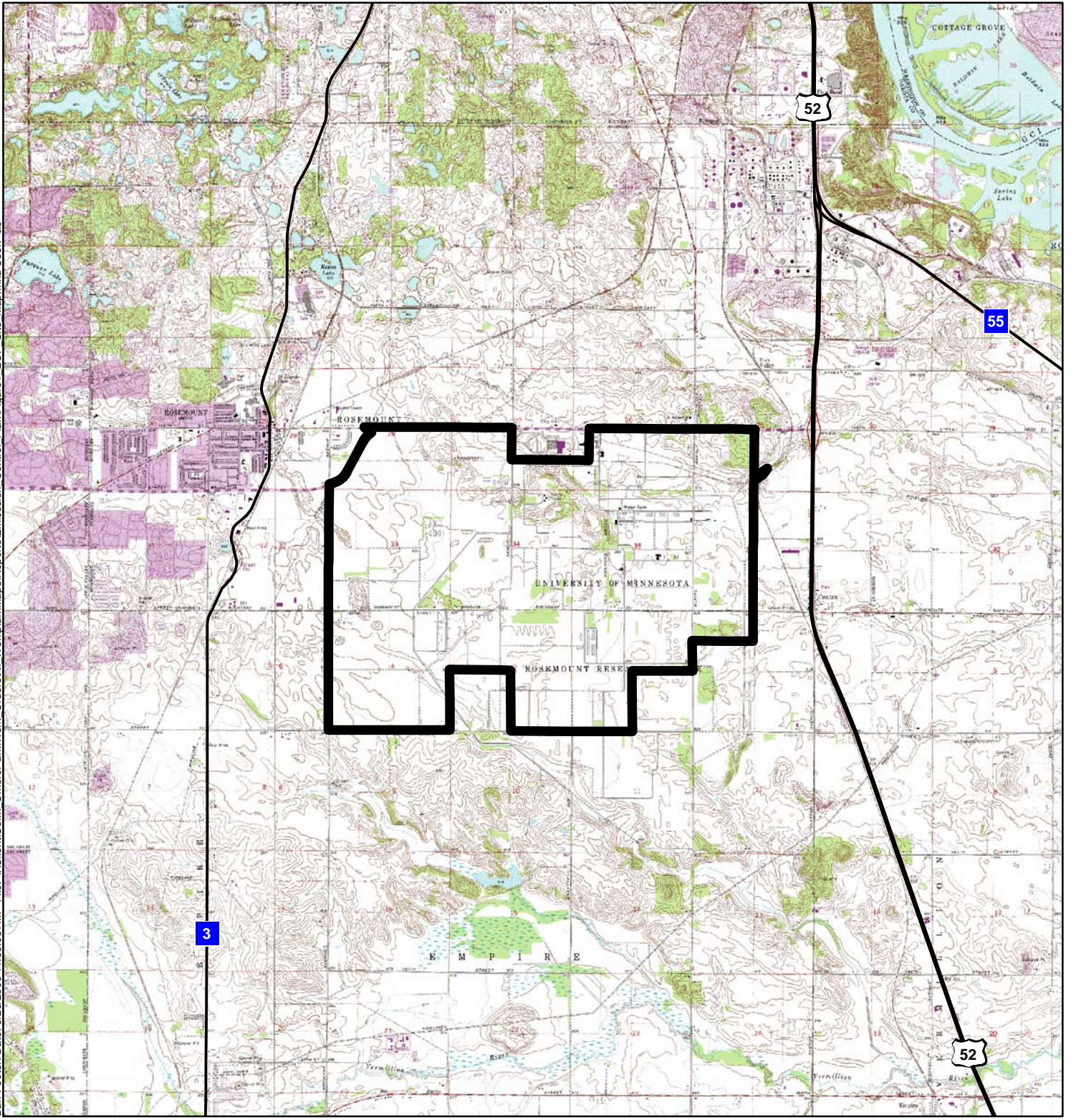


Figure 1

 UMore Park Boundary

SITE LOCATION



UMore Mining Area
Asbestos Emission Control Plan
UMore Park
Dakota County, MN

