



# **Asbestos Emission Control Plan**

***UMore Park***

***Dakota County, Minnesota***

Prepared for the  
University of Minnesota

Revised: April 2016

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# Asbestos Emission Control Plan

April 2016

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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 UMore Park.

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 when it is encountered during environmental investigation, remediation, or re-development activities. 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.

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## 2.0 Site Description

UMore Park covers a 5,000+ acre area located in Dakota County, Minnesota. The 2016 Remedial Investigation (RI) project area is comprised of ten sites of concern (SOCs) at the former Gopher Ordnance Works (GOW or Site). The GOW was used in 1945 for less than a year by the U.S. Department of Defense for the production of smokeless canon powder. Several of the GOW-era buildings were constructed with transite siding and other asbestos containing building materials. ACWM has been observed on the ground surface in the vicinity of some GOW-era buildings and buried in demolition debris dumps on-site. AWCM may be identified in other areas during the RI field work.

## 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). The following MPCA guidance documents were used for developing this ECP:

- *Asbestos-containing Waste Materials at Voluntary Investigation and Cleanup Sites, Cleanup/Voluntary Investigation and Cleanup/#1.01/June 2004*
- *Voluntary Investigation and Cleanup Program Guidance for Investigating and Remediating Asbestos Containing Waste Materials - Guidance Document #9, VIC Version 1.0 – July 2004*
- *Asbestos Guidance on Excavation Projects, Air Quality/Asbestos Program/#4.03/July 1999*

### 3.1 Roles and Responsibilities

All workers on-site will attend the UMore Park Asbestos Awareness course that is conducted by the University's asbestos abatement staff. Barr Engineering's field team leader will be a certified Asbestos Inspector, who will be responsible for identification of potential ACWM during the 2016 RI field work and for following the protocols described under environmental activities - levels one through three. The University's asbestos abatement staff, lead by Sean Gabor, will inspect the investigation locations prior to start of the field work and will provide support services as the work progresses, as described below. The University is responsible for managing the pre-investigation inspection ACWM abatement (if necessary) and related tasks including regulatory notifications, site security, air monitoring, transportation and disposal, and reporting of ACWM.

### 3.2 ACWM Management during Environmental Investigation/Remediation

During the 2016 RI, 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 Level One – Access to Investigation Sites

Level one environmental activities consist of moving heavy equipment used during the field investigation to the each location where samples will be collected.

- A University certified asbestos inspector will inspect the routes into each location where environmental samples will be collected.
- Following the initial inspection, trees and shrubs will be cut above the ground surface to allow the backhoe or drilling rig access to the sample collection site. A certified asbestos inspector will look for potential ACWM while the vegetation is cleared, to prevent damage to any ACWM on the ground.
- If additional ACWM is identified all activity in the immediate area of the ACWM will stop and an alternate route will be developed to avoid the ACWM. If the development of an alternate route is not feasible, the location of the ACWM will be marked, and the University will be notified. ***The GPS location of the potential ACWM will be immediately reported to Sean***

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**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 test trenching, and other earthwork activities conducted in areas of no known ACWM.

- An asbestos inspector will be on-site during all activities.
- If ACWM is encountered in a test trench the soil and debris will be wetted with a soap and water solution, the location of the test trench where the potential ACWM was encountered will be surveyed and representative samples will be collected for laboratory analyses to confirm the presence of asbestos (if necessary). Upon completion of the trenching activity, the excavation material will be placed back in the trench and covered with excavated topsoil. **The GPS location of the potential ACWM will be reported to Sean Gabor of the University of Minnesota at the end of the RI.**

### 3.2.3 Environmental Activities - Level Three

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

- An asbestos inspector will be on-site during all activities.
- A University asbestos inspector will be on-call during all activities.
- Surface ACWM will be removed by an asbestos abatement contractor from areas requiring access (if an alternate route is not feasible) for test trench excavation, soil boring placement and sample collection prior to entering the area as described in Level One.
- Prior to digging the test trench poly sheeting will be placed on the ground. If demolition debris is observed the excavated material will be placed on the poly sheeting. If potential ACWM is observed with the debris, the excavated material will be placed on the plastic sheeting and it will be wetted with a soap and water solution, the location of the test trench where the potential ACWM was encountered will be surveyed and representative samples will be collected for laboratory analyses to confirm the presence of asbestos (if necessary). Upon completion of the trenching activity, the plastic sheeting and excavation material will be placed back in the trench and covered with excavated topsoil. **The GPS location of the potential ACWM will be reported to Sean Gabor of the University of Minnesota at the end of the RI.**
- ACWM remediation will be included in the subsequent remediation studies for the UMore Park study area.

## 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.

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### **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.

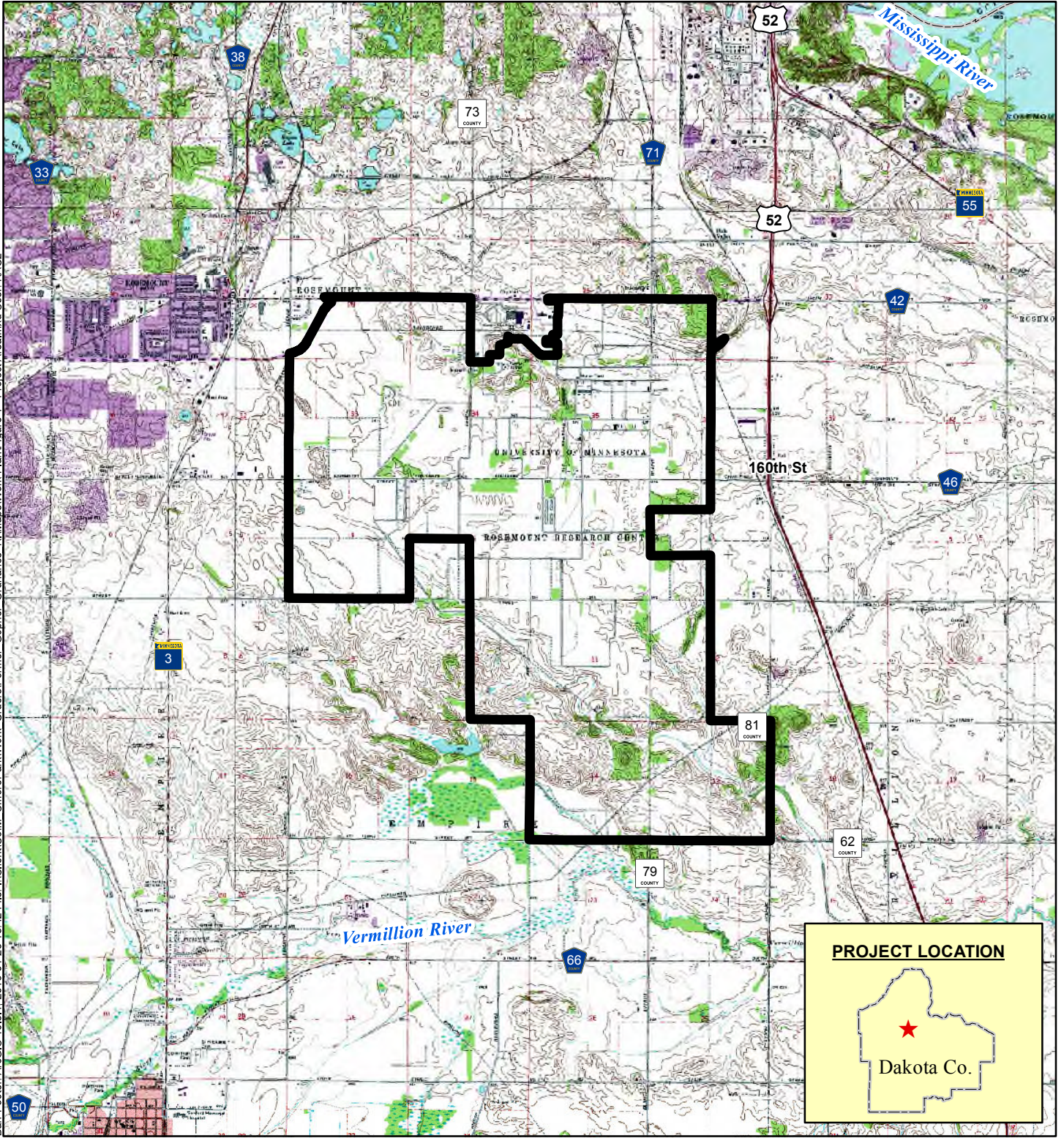
### **3.3.4 Reporting**


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

## Figures



Barr Footer: ArcGIS 10.3.1, 2016-01-25 13:42 File: I:\Client\UoM\_UmorePark\Work\_Orders\Former\_Gopher\_Ordnance\_RIMaps\Work\_Plan\Figure 1 - Project Area.mxd User: KAC2



 Remedial Investigation Study Area

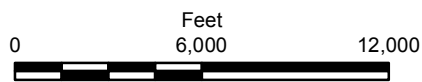


Figure 1

PROJECT AREA  
Former Gopher  
Ordnance Works  
Dakota County, MN



Source: MnDOT, MN DNR, Dakota County, Barr, HKGI, University of Minnesota.  
USGS topographic map background downloaded from the U.S.  
Department of Agriculture, Natural Resources Conservation Service.