

	Dubois Library PCB Abatement Communication Plan	Document Number: EHS-EH-SOP.02
		Effective Date: 09 April 10
		Revision Date: 09 April 10

1. Purpose and Applicability

- 1.1. This document is written to detail the communication plan for the PCB abatement of the Dubois Library elevator lobby. This plan has been developed jointly by EHS and FCP. The plan was developed to clearly detail the flow of information between the project team and concerned employees, regulatory authorities, and visitors. The plan also complies with an EPA request to institute a clear procedure for communication.

- 1.2. This Plan is intended to detail the flow of information between affected parties such as: FCP, EHS, W&C, AE, MA, EC, EPA, MADEP, and building occupants, site visitors, and other concerned parties including employee representatives. This plan does not include communication with news agency, which should be handled through the University's News Bureau. The purpose of this plan is to ensure that communications by and between affected parties are received, investigated, responded to, recorded, and made available for review by affected parties.

2. Definitions

- 2.1. Abatement Project – The removal and abatement of specified PCB caulking and impacted building materials from the elevator lobby in the Dubois Library.
- 2.2. After Hours – any time other than normal business hours.
- 2.3. AE - American Environmental, the abatement contractor performing the building abatement and construction work.
- 2.4. BC – Building Coordinator, the Library staff that will triage complaints or concerns from the building occupants
- 2.5. EHS – University of Massachusetts Environmental Health and Safety Office.
- 2.6. ESM – Environmental Services Manager.
- 2.7. EPA – United States Environmental Protection Agency.
- 2.8. FCP – University of Massachusetts Facilities and Campus Planning Office.
- 2.9. FCP PM – Facilities and Campus Planning Project Manager.
- 2.10. MADEP – Massachusetts Department of Environmental Protection
- 2.11. MA – Murphy Associates, the engineering company of record for this project.
- 2.12. Normal Business Hours – 8:30 AM until 5:00 PM, Monday through Friday, excluding holidays
- 2.13. PCB – Polychlorinated Biphenyls (regulated under the Toxic Substances Control Act)
- 2.14. Records – An up to date log of inquiries, acknowledgements, investigations and responses kept on file by EHS for review by affected parties at 117 Draper Hall.
- 2.15. W&C – Woodard and Curran, the industrial hygiene company providing oversight and compliance of the PCB remediation

3. Roles and Responsibilities

3.1. Key Personnel –

- 3.1.1. **Theresa Bechta, REM (ESM)** – Theresa Bechta is the Assistant Director Environmental and Hazardous Materials Management Services for the University's EHS Office. The ESM is the responsible person for all



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communication regarding the PCB Abatement portion of the Library elevator project. The ESM can be contacted at (413) 545-2682 or by e-mail at tbechta@ehs.umass.edu. All abatement communications for this project will be logged by the ESM and all inquiries will receive a timely written response from the ESM. The ESM is also responsible for maintaining records of all abatement inquiries and their respective responses.

3.1.2. **Henry Merriman (FCP PM)** – Henry Merriman is the Facilities and Campus Planning Project Manager responsible for this project. The BC or ESM will contact the FCP PM with any construction related issues. The FCP PM is responsible for handling all construction related activities and for providing written response to all inquiries directed to the BC or ESM.

3.1.3. **Theresa Warner (BC)** – Theresa Warner is the Dubois Library Building Coordinator. The BC will triage occupant complaints to either the ESM if abatement related or to the FCP PM if project related.

3.1.4. **EHS Office Staff** – The EHS Office staff will receive all phone inquiries during normal business hours. They are responsible for ensuring that these contacts are referred to the ESM in a timely manner. The EHS Office Staff will make every effort to ensure that the phone call is answered by a person and directed to the ESM in a timely manner.

3.2. *The BC, ESM and FCP PM will designate a responsible person in their absence. The terms “BC”, “ESM” and “FCP PM” as used in this Plan mean either the ESM and FCP PM or their perspective designee.*

4. Procedure

4.1. Inquiries regarding the abatement of PCBs from the elevator lobby of the Dubois Library should be initiated by calling the ESM at (413) 545-2682 or by e-mailing the ESM at tbechta@ehs.umass.edu. Building occupants can also contact the BC at (413) 577-1596 or by emailing twarner@library.umass.edu. The BC will then forward the inquiry to the ESM.

4.2. **All emergencies, such as fire or injury, associated with this project should be immediately reported through 911.** EHS is contacted to respond to campus emergencies, and is dispatched through 911.

4.3. EHS should receive all abatement related inquiries.

4.3.1. After Hour Inquires

4.3.1.1. The ESM can be reached by calling the EHS main number 545-2682 and EHS staff will contact the ESM. The ESM will make every reasonable effort to return the call within 30 minutes. The ESM will receive all inquiries and initiate a log entry.

4.3.1.2. If the inquiry is not minor or is urgent, the ESM will respond in a prompt and timely fashion to investigate the matter. The ESM will receive all inquiries and initiate a log entry.

4.3.1.3. If the inquiry is minor and is not urgent, the ESM will acknowledge the inquiry and will respond the next business day. The ESM will receive all inquiries and initiate a log entry.

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4.3.2. Normal Business Hour Inquires

- 4.3.2.1. The ESM should be contacted by calling EHS at (413) 545-2682 (5-2682 from a campus phone) or by e-mailing the ESM at tbechta@ehs.umass.edu.
- 4.3.2.2. If the inquiry relates to environmental, health, and/or safety, the ESM will respond in a timely manner.
- 4.3.2.3. If the inquiry relates to construction issues, the ESM will initiate the log entry and forward the inquiry to the FCP Project Manager. The ESM will notify the initiator of the inquiry that the inquiry has been forwarded to the FCP PM. The FCP Project Manager will coordinate an investigation and an appropriate written response to each inquiry.
- 4.3.2.4. The FCP Project Manager will send the ESM all written responses. The ESM will record the response and distribute as appropriate.
- 4.3.2.5. Building occupants if desired may contact the BC, who will forward the inquiry to the ESM
- 4.3.3. The ESM will document all responses and communications in the Records and is responsible for providing a written response to the concerned party in a prompt and timely fashion. The ESM will also copy the BC.
- 4.3.4. The ESM will also maintain the Records, which will be readily available during normal business hours for review by affected parties. All communication records will be stored at the EHS Office – Draper Hall 102.

5. Key References

- 5.1. PCB Remediation Plan Risk-Based Disposal and Cleanup Dubois Library, Woodard and Curran, March 2010
- 5.2. Dubois Library PCB Cleanup and Disposal Approval under 40 CFR 761.61©; 761.62 and 761.79(h), United States Environmental Protection Agency, April 2010