

	Lederle Window PCB Communication Plan	Document Number: EHS-EH-SOP.01
		Effective Date: 6/8/2007
		Revision Date: 7/15/2013

1.0 Purpose and Applicability

- 1.1 This document is written to detail the communication plan for the Polychlorinated Biphenyls (PCB) abatement and encapsulation of Tower A and the low rise building of the Lederle Graduate Research Center. This plan has been developed jointly by Environmental Health and Safety (EH&S) and Design and Construction Management (DCM). 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: DCM, EH&S, Contractors, Designers, the 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.

2.0 Definitions

- 2.1 Abatement/Encapsulation Project – The removal or encapsulation of specified PCB window glazing from Tower A and the low rise building.
- 2.2 After Hours – any time other than normal business hours.
- 2.3 Chapman – The contractor performing the encapsulation work in Tower A. Chapman will be responsible for all subcontractors including Compass, who will be performing the abatement work
- 2.4 DCM – Design and Construction Management
- 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 Goldman Reindorf Architects Inc.– The engineering company of record for this project.
- 2.8 MADEP – Massachusetts Department of Environmental Protection
- 2.10 Normal Business Hours – 8:30 AM until 5:00 PM, Monday through Friday, excluding holidays
- 2.11 PCB – Polychlorinated Biphenyls (regulated under the Toxic Substances Control Act)
- 2.12 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.
- 2.13 W&C – Woodard and Curran, the industrial hygiene company providing oversight and compliance for the PCB portion of this project

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3.0 Roles and Responsibilities

3.1 Key Personnel –

3.1.1 **Theresa Wolejko, REM** – Theresa is the Assistant Director Environmental and Hazardous Materials Management Services for the University’s EHS Office and will be the Environmental Services Manager for this project. The ESM is the responsible person for all communication regarding the Lederle PCB Abatement project. The ESM can be contacted at (413) 545-2682 or by e-mail at twolejko@ehs.umass.edu. All 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 inquiries and their respective responses.

3.1.2 **Peter Gray-Mullen** – Peter is the Design and Construction Management Project Manager responsible for the encapsulation project in Lederle Tower A. The ESM will contact the DCM PM with any construction related issues. The DCM PM is responsible for handling all construction related activities and for providing written response to all inquiries directed to the ESM.

3.1.3 **Gail Kenny** - Gail is the Design and Construction Management Project Manager responsible for the remediation and encapsulation project in Lederle low-rise. The ESM will contact the DCM PM with any construction related issues. The DCM PM is responsible for handling all construction related activities and for providing written response to all inquiries directed to the ESM.

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.

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

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4.0 Procedure

4.1 All inquiries regarding the abatement of PCBs from the exterior of Lederle Graduate Research Center Tower A and Low-rise structures should be initiated by calling (413) 545-2682 (5-2682 from a campus phone) or by e-mailing the ESM at twolejko@ehs.umass.edu.

4.2 **All emergencies, such as fire or injury, associated with this project should be immediately reported through University of Massachusetts Police Department 413-545-2121 or 911.** EHS is contacted to respond to campus emergencies, and is dispatched through the University of Massachusetts Police Department.

4.3 EHS will receive all inquiries.

4.4 After Hour Inquires

4.4.1 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.

4.4.2 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.

4.4.3 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.

4.5 Normal Business Hour Inquires

4.5.1 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. The ESM will receive all inquiries and initiate a log entry.

4.5.2 If the inquiry relates to environmental, health, and/or safety, the ESM will respond in a timely manner.

4.5.3 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.

4.5.4 The DCM Project Manager will send the ESM all written responses. The ESM will record the response and distribute as appropriate.

4.6 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.

4.7 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.

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5.0 Key References

- 5.1 Lederle PCB Abatement Communication Plan Process Flow Diagram (Attachment A)
- 5.2 Lederle PCB Abatement Communication Plan Log Book

APPENDIX A

**Lederele PCB Abatement
Communcation Plan**

Responsible Person: EHS Environmental Services Manager (EHS ESM)
Phone Number: 413-545-2682
Emergency Number: 911*
Pager Number: 413-292-8425

** All true emergencies must go through 911 (e.,g injury, fire)*

