

	<b>Lederle PCB Abatement Communication Plan</b>	<b>Document Number: EHS-EH-SOP.01</b>
		<b>Effective Date: 8 June 07</b>
		<b>Revision Date: 1 Aug 07</b>

## 1.0 Purpose and Applicability

1.1 This document is written to detail the communication plan for the PCB abatement of Tower A and the low rise building of the Lederle Graduate Research Center. 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, EHE, Chapman, Gale Associates, 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.

## 2.0 Definitions

- 2.1 Abatement Project – The removal and abatement of specified exterior PCB caulking and impacted building materials from Tower A and the low rise building.
- 2.2 After Hours – any time other than normal business hours.
- 2.3 Chapman – The waterproofing contractor performing the abatement and construction work.
- 2.4 EHE – Environmental Health and Engineering, the industrial hygiene company providing oversight compliance of the approved abatement work.
- 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 Gale Associates – The engineering company of record for this project.
- 2.11 MADEP – Massachusetts Department of Environmental Protection
- 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 at 117 Draper Hall.

	<b>Lederle PCB Abatement Communication Plan</b>	<b>Document Number:</b> EHS-EH-SOP.01
		<b>Effective Date:</b> 8 June 07
		<b>Revision Date:</b> 1 Aug 07

### 3.0 Roles and Responsibilities

#### 3.1 Key Personnel –

3.1.1 **Brian Fitzpatrick, CHMM** – Brian Fitzpatrick is the Environmental Services Manager for the University’s EHS Office. 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 [bfitzpatrick@ehs.umass.edu](mailto:bfitzpatrick@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 **Stephen Lobik** – Stephen Lobik is the Facilities and Campus Planning Project Manager responsible for this project. The 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 ESM.

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

### 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) during normal business hours, or by e-mailing the ESM at [bfitzpatrick@ehs.umass.edu](mailto:bfitzpatrick@ehs.umass.edu). After hours calls should be made to (413) 292-8425, which is a pager number.

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 will receive all inquiries.

#### 4.4 After Hour Inquires

4.4.1 The ESM will be paged at (413) 292-8425, and the ESM will make every reasonable effort to return the page 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.

	<b>Lederle PCB Abatement Communication Plan</b>	<b>Document Number:</b> <b>EHS-EH-SOP.01</b>
		<b>Effective Date: 8 June 07</b>
		<b>Revision Date: 1 Aug 07</b>

4.4.3 If the inquiry is minor and is not urgent, the ESM will acknowledge the page in a prompt and timely fashion 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 [bfitzpatrick@ehs.umass.edu](mailto:bfitzpatrick@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 FCP 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. All communication records will be stored at the EHS Office – Draper Hall 117.

#### **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