

Gilsenan, Michael

From: Radhakrishnan, Krish
Sent: Friday, January 10, 2003 11:31 AM
To: 'Wilson.EricJ@epamail.epa.gov'
Cc: Gilsenan, Michael
Subject: OSHA JUSTIFICATION

Eric,



osha.doc

I hope the justifiacion is ok. Please call me if you have any comments. Thanks

In most cases minimal dust accumulations were observed on components and the system has been in operation for over a year, large amounts of debris are not expected during dismantling of the system components. All specified cleaning is being performed through the use of compressed air after the installation of negative pressure ventilation equipment and system isolation devices. The existing dust/debris conditions and required engineering controls for the cleaning indicate that personal air samples are not expected to exceed 0.1 f/cc. The cleaning contractor shall collect personal air samples on workers and submit the results of sampling within 48 hours. Based on the above the work area will not be considered as regulated area. In the event large accumulations of dust/debris are observed during the work or personal air samples exceed 0.1 f/cc work shall stop immediately and isolation barriers /containment shall be installed.