ENVIRONMENTAL COMPLIANCE ASSESSMENT:

NEW BEDFORD HURRICANE BARRIER
NEW BEDFORD/FAIRHAVEN, MASSACHUSETTS

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NEW BEDFORD HURRICANE BARRIER
NEW BEDFORD/FAIRHAVEN, MASSACHUSETTS

PRELIMINARY FINDINGS REPORT

U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts
02254-9149

September 1994

US Army Corps of Engineers
New England Division

For Inter Corps Office Distribution Only

CENED-OD-P

13 September 1994

MEMORANDUM THRU Chief, NRM Branch

FOR Director of Operations

SUBJECT: Environmental Compliance Assessment of the New Bedford Hurricane Barrier

1. Attached please find the Environmental Compliance Assessment of the New Bedford Hurricane Barrier. Assessment was prepared by the NED ERGO Team: Bruce Williams and Jim Law (NED-OD-P); Mike Penko (NED-PL); Vicky Volz (NED-ED-WQ); Jim Peck (NED-SO); and Anne Laster (NED-RE).

2. Upon approval of the assessment, the Flood Control Project Manager will be tasked with development of a corrective action plan to schedule and prioritize resources to address findings identified in this assessment. In order that resources are dedicated to correct these problems, recommend that remediation which can be performed as routine maintenance work be completed within the next 3 years; other work should be programmed for completion within 5 years.

3. I recommend your approval for implementation.

Bruce Williams
Environmental Compliance
Coordinator

Atch

CMT 2

1. The Environmental Compliance Assessment for the New Bedford Hurricane Barrier is: Approved __X__ Disapproved _____ for implementation.

J. C. WONG
Director of Operations

Atch

EXECUTIVE SUMMARY

An environmental compliance assessment of New Bedford Hurricane Barrier in New Bedford and Fairhaven, Massachusetts, was conducted by an interdisciplinary team of New England Division environmental professionals on 20 May 1994.

The assessment was conducted as part of the U.S. Army Corps of Engineers Environmental Review Guide for Operations (ERGO) program. The ERGO program establishes the use of environmental compliance assessments to ensure compliance with all applicable Federal, state, local, Department of Defense (DoD), and U.S. Army laws and regulations.

An overall ERGO compliance assessment considers 13 major environmental compliance categories. Each category, Federal, state and local laws, DoD and U.S. Army Corps of Engineers regulations, and good management practices are reviewed. Overall the project was well maintained as demonstrated by the lack of serious environmental deficiencies. The findings at New Bedford Hurricane Barrier are as follows:

Significant Deficiencies - None
Problems that pose a direct & immediate threat to human health, safety or to the environment.

Major Deficiencies - One (1)
Problems that require action and pose a threat to human health, safety or to the environment.

Minor Deficiencies - Eight (8)
Deficiencies that are mostly administrative in nature. These problems require monitoring or planning for future mitigation.

Management Practices - Two (2)
Items noted are not specifically covered by laws or regulations; however, they still require management attention.

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THE ERGO PROGRAM

The U.S. Army Corps of Engineers initiated the Environmental Review Guide for Operations (ERGO) program as a comprehensive self-evaluation and program management system for achieving, maintaining, and monitoring compliance with environmental laws and regulations at Corps of Engineers projects and facilities. Objectives of the ERGO program are to:

1) Enhance Corps of Engineers environmental compliance at federal, state, and local levels.

2) Improve Corps of Engineers environmental management.

3) Build supporting financial programs and budgets.

4) Assure supervisors their environmental programs are being implemented effectively in accordance with Corps of Engineer goals and objectives.

Periodic internal environmental compliance assessments have been deemed necessary. These evaluations are designed to assess environmental compliance and to provide necessary feedback to supervisors for organizing, directing, and controlling environmental compliance and protection activities.

The Corps of Engineers ERGO program began with the creation of a steering committee. Arrangements were made with the U.S Army Construction Engineering Research Laboratory (USACERL) to compile all relevant federal, Department of Defense, Army, Corps of Engineer and state and local laws and regulations to produce the draft manual. The ERGO manual of environmental compliance assessments was pilot tested at various facilities in the Nashville District in May 1990. The program was field tested at several projects during FY 1991 and the manual was distributed as a final draft.

In January 1991, the Chief, Operations, Construction and Readiness Division (USACE), directed division and district operations offices to formally designate Environmental Compliance Coordinators (ECC's). Because it is responsible for the majority of USACE facilities, Operations Directorate was tasked with the development and maintenance of the ERGO program. New England Division's ERGO program became operational in August 1991. An ERGO review team was established by the ECC in October 1991. The ERGO Program Manager scheduled the 18 remaining projects in NED, including New Bedford Hurricane Barrier, for completion of environmental compliance assessments in FY-94

ASSESSMENT PROCEDURES

The ERGO assessment of New Bedford Hurricane Barrier was conducted by a 6 person team comprised of NED personnel. The team followed a three phase approach. The first phase was to obtain pre-assessment information (see Appendix A) from the site concerning on-site activities and review applicable state or local environmental regulations.

The second phase involved the on-site portion of the assessment. This involved a briefing of project, district and/or regional management and staff, followed by a facility tour to obtain a general overview of facility operations. Typically, the team member would interview project staff responsible for a particular functional area, visually inspect the project/facility, and verify that required written documentation was in place. When possible, all deficiencies were reported to facility personnel. The team concluded the on-site portion of the assessment by briefing the project manager and staff to apprise them of the review team's findings.

The third phase involves developing the draft report and developing an action plan for addressing outstanding deficiencies. The evaluation of New Bedford Hurricane Barrier followed the above procedures and covered the elements set forth in the 13 ERGO protocols.

The assessment was conducted in accordance with the best professional judgement of the ERGO team members. It should be understood that the assessment consisted of reported and sample observations taken over a short span of time relative to the period under review. Efforts were directed toward reviewing major facets of environmental performance in the period covered, and therefore, it is important to recognize that this assessment may not necessarily identify all potential problems.

Successful completion of the site-specific environmental evaluation of New Bedford Hurricane Barrier was reliant on complete foreclosure of all information regarding the operation and maintenance activities at the project.

It should be noted that failure of a manager to provide complete or adequate information to the review team does not relieve the manager of the responsibility for compliance with environmental regulations.

ERGO PROGRAM OBJECTIVES

The Environmental Review Guide for Operations (ERGO) manual is intended to serve as the primary tool for conducting environmental compliance evaluations at Corps of Engineer projects and facilities. The objectives of the program are to:

1) Compile applicable Federal laws and regulations associated with Corps of Engineers operations and activities.

2) Synthesize environmental regulations, good management practices, and risk management issues into consistent and easy to use checklists.

3) Serve as a reference document for daily operations.

4) Serve as a standard for evaluation of environmental compliance.

DESCRIPTION OF REGULATORY COMPLIANCE

This section of the report presents a summary of findings in those categories that are governed by engineering regulations, engineering manuals, federal regulations, and state regulations. Non-regulatory items, which are referred to in this report as a management practices, are of a lower priority but require attention to correct.

Deficiencies noted in this evaluation will include the following information:

SIGNIFICANT DEFICIENCY (SIG.):

A problem categorized as significant requires immediate attention. It poses, or has high likelihood of posing, a direct and immediate threat to human health, safety, the environment, or the installation mission.

MAJOR DEFICIENCY (MAJ.):

A problem categorized as major requires action, but not necessarily immediate attention. It has the potential to result in a notice of violation from regulatory agencies. A major deficiency may pose a threat to human health, safety or the environment.

MINOR DEFICIENCY (MIN.):

A minor deficiency is mostly administrative in nature, even though it might result in a notice of violation. It may also be a temporary or occasional instance of noncompliance.

MANAGEMENT PRACTICE (MGT.):

A management practice is not considered a deficiency because it is not based on a specific regulatory requirement. Although items noted may not be specifically covered by regulation, and are not assigned severity ratings, they still require management attention.

SUMMARY OF DEFICIENCIES
for
NEW BEDFORD HURRICANE BARRIER

COMPLIANCE CATEGORY	SIG.	MAJ.	MIN.	MGT.
Air Emissions				
Cultural and Historic Resources Management				1
Hazardous Material Management		1	4	
Hazardous Waste Management				1
Natural Resources Management			1	
Pesticide Management				
Petroleum Oil and Lubricant (POL) Management			1	
Solid Waste Management				
Special Pollutants Management (Radon, Asbestos, PCB's, Noise)			1	
Underground Storage Tanks (UST) Management				
Wastewater Management			1	
Water Quality Management				
Floating Plant Management				
Totals		**1**	**8**	**2**

AIR EMISSIONS MANAGEMENT

FINDING: There were no air emissions management findings at the New Bedford Hurricane Barrier.

CULTURAL AND HISTORIC RESOURCES MANAGEMENT

FINDING:	Management Practice
CONDITION:	A large collection of photographs taken during construction of the New Bedford Hurricane Barrier construction is stored at the project under less than ideal conditions. It is unknown if the negatives or a copy of the photographs are archived elsewhere.
CRITERIA:	Army and Corps of Engineers regulations require professional preservation and proper curation of documents, including historic photographs (AR-25-400-2 and ER 1130-2-433, para 10).
SOLUTION:	Flood Control Project Manager should determine if another set of the photographs or the negatives exist and are properly archived. If another set does not exist, make a copy of the collection for use at the Barrier and properly archive the originals. This effort should be coordinated with Tim Hays of the NED technical library.

HAZARDOUS MATERIAL MANAGEMENT

FINDING: A current file of applicable Federal, Corps, and state/local Hazardous Material regulations has been furnished to the Project Manager. The following regulations should be maintained and kept current at the facility: 29 CFR 1910, Occupational Safety and Health Standards, 40 CFR 302, Reportable Quantities of Hazardous Materials (Table 302.4), 49 CFR 172, 173, 178 and 179, Research and Special Programs Administration, NEPA, National Environmental Policy Act, ER 500-1-1, Natural Disaster Procedures Ch.1., and appropriate state/ local regulations. Flood Control Project Manager should maintain these materials and update as necessary.

COMMENT: Knowledge of regulations required to assure safe and environmentally compatible handling of hazardous materials.

FINDING: Minor Deficiency

CONDITION: Facility has not coordinated with the local fire department concerning types of hazardous chemicals used at the facility, the areas used, and quantities used in a given operation.

CRITERIA: Review local coordination efforts with the local fire department to insure the department is aware of area that are at high risk for chemical incidents (EM 385-1-1, para 09.A.16).

EFFECT: Coordination may provide valuable information for fire department personnel regarding methods of extinguishing the blaze, maximizing personal safety, and notification/evacuation of adjoining areas.

SOLUTION: Project Manager should coordinate with fire department as noted above.

FINDING: Minor Deficiency

CONDITION: Master list of storage areas for hazardous materials is not available.

CRITERIA: Facility should have a Master List of areas in which hazardous materials are stored at the facility and a copy of master list is to be kept on file at Cape Cod Canal field office.

SOLUTION: Listing to be prepared by the Flood Control Project Manager.

FINDING: Major Deficiency

CONDITION: Facility does not have a written Oil and Hazardous Substance Contingency Plan.

CRITERIA: Facility is required to have plan which includes the following items: identification of all hazardous substance storage areas, designated individual to initiate spill response, periodic drills, spill cleanup equipment, emergency medical procedures, emergency phone numbers and decontamination procedures (ER 1130-2-434, para 7c(1), ER-500 and 40 CFR 300.105 (a)).

SOLUTION: Flood Control Project Manager reported that plans are being developed by the project personnel and will be included in the Federal Response Plan and the Flood Emergency Plan.

COMMENT: Plan needed to insure that proper and timely action is taken during spill events to minimize environmental harm and insure public health and safety.

FINDING: Minor Deficiency

CONDITION: Facility has not provided the local fire department with Material Safety Data Sheet (MSDS) for all hazardous chemicals stored at site.

CRITERIA: MSDS should be provided to both Fairhaven and New Bedford Fire Departments (40 CFR 1910.1200 (9) (1) and 1910.1200 (9)(8), EM 385-1-1, para 13.G.02).

SOLUTION: Flood Control Project Manager should provide copies of MSDS sheets to both fire departments.

COMMENT: MSDSs are needed to assure proper product use and to mitigate harmful effects.

FINDING: Minor Deficiency (WH)

CRITERIA: Inside flammable/combustible storage room does not meet parameters for ventilation and containment specified in NFPA 30 4-4.1.2 Flammable and Combustible Liquids and 29 CFR 1910.106(d)(4).

SOLUTION: Flood Control Project Manager should purchase and install fireproof lockers to contain hazardous materials and discontinue storing hazardous material within the storage room.

COMMENT: Poor ventilation in the storage room creates an unhealthy environment and potential fire hazard for workers.

HAZARDOUS WASTE MANAGEMENT

FINDING: Management Practice

CONDITION: Creosote coated stop logs are stored at New Bedford Hurricane Barrier.

CRITERIA: Use of hazardous materials should be minimized to the greatest extent possible.

SOLUTION: Assess the need for stop logs and dispose of properly if they are no longer needed. It logs are still needed, consider replacement with pressure treated lumber. Workers should take precautions to minimize contact when handling creosote treated timbers (i.e. gloves, long sleeved shirts).

NATURAL RESOURCES MANAGEMENT

FINDING: Minor Deficiency

CONDITION: Project Operational Management Plan (OMP) has not been developed in coordination with the planning, real estate and safety elements of the project.

CRITERIA: All Corps facilities (including Navigation Projects) are required to develop and maintain a project OMP (ER 1130-2-400 para.6 and para. 9 through 11 Appendix B.).

SOLUTION: Flood Control Project Manager should develop an OMP in accordance with ER 1130-2-400 and assure that it addresses all operational projects in the Master Plan (ER 1130-2-435). Verify that the OMP has been approved by the Division Commander and is updated as required.

PESTICIDE MANAGEMENT

FINDING: There were no Pesticide Management findings at the New Bedford Hurricane Barrier.

PETROLEUM, OIL AND LUBRICANT (POL) MANAGEMENT

FINDING: Minor Deficiency

CONDITION: Fuel is stored in aboveground fuel tanks located at both compressor building sites and in the New Bedford Abutment building. No secondary containment is present.

CRITERIA: Above ground storage tanks shall be diked or curbed, or other suitable means provided to prevent the spread of liquids in case of leakage in tank or piping. Such dike or curbed area shall have a capacity at least equal in volume to that of the largest tank plus 10% (EM 385-1-1 12.D.13.).

SOLUTION: Flood Control Project Manager should initiate action to dike fuel storage areas.

FINDING: A current file of applicable Federal, Corps, and state/local POL regulations has been furnished to the project. The following regulations should be maintained and kept current at the facility: 29 CFR 1910, 33 CFR 153, 40 CFR 110, 112, 40 CFR 266, EM 385-1-1, EP 415-1-261, ER 500-1-1, and appropriate state/ local regulations. Flood Control Project Manager should maintain these materials and update as necessary.

SOLID WASTE MANAGEMENT

FINDING: There were no Solid Waste Management findings at the New Bedford Hurricane Barrier.

SPECIAL POLLUTANTS -ASBESTOS

FINDING: Project reported that the barrier buildings are all concrete block structures. Insulation materials are not present in the structure and never have been. New Bedford has no insulation of any kind.

SPECIAL POLLUTANTS - NOISE

FINDING:	Minor Deficiency
CONDITION:	A comprehensive noise survey has not been conducted of the facility to identify potential noise hazards and to determine adequate personnel protection.
CRITERIA:	Personnel shall not be exposed to 85 dB (a) or 140 dB impulse where engineering or administrative controls are not instituted (EM 385-1-40, Occupational Health, EM 385-1-1, Safety Manual).
SOLUTION:	Flood Control Project Manager should arrange to have a noise survey conducted and institute controls where needed.

SPECIAL POLLUTANTS - RADON

FINDING: In FY 91, a radon survey was conducted at all NED facilities. The radon survey of New Bedford Hurricane Barrier was reported to have been conducted at the same time. Results of the survey are as follows:

Location	pC/l
Test #1	0.40
Test #2	0.40

CRITERIA: Areas sampled which test at 4.0 picoCuries/liter or lower require no further attention. Areas sampled which test at 4.0 picoCuries/liter or higher require long range testing and/or mitigation within 5 years. Areas which test at 20.0 picoCuries/liter or higher require immediate mitigation and retesting.

COMMENT: Radon survey was conducted under the Army Radon Reduction Program (ARRP) administered by the USAEHSC.

UNDERGROUND STORAGE TANK (UST) MANAGEMENT

FINDING: There are no underground storage tanks at the New Bedford Hurricane Barrier.

WASTEWATER MANAGEMENT

The flood protection project, located in Clark Cove of Buzzard's Bay, New Bedford, and in New Bedford Harbor, New Bedford and Fairhaven, Bristol County, Massachusetts, is operated and maintained by the city of New Bedford, except for the navigation gates, which are operated and maintained by the Corps of Engineers.

The only toilet at the project is located in the west control house of the gated navigation opening in the harbor barrier and dike. Corps of Engineers personnel transport city water, in a 150-gallon storage tank, to supply the toilet, wash basin, and steam heating system. Sanitary wastewater drains to a pre-cast concrete holding tank, which is pumped out for disposal, as needed, by a licensed septage hauler. Besides an incoming pipe, as-built project drawings indicate a pipe through the abutment wall. It is not known whether this was ever intended for direct discharge of raw sewage to the harbor; since original construction in the 1960s, this line was capped and gasketed. There is no direct discharge or groundwater injection of sanitary wastewater.

FINDING:	Minor Deficiency
CONDITION:	The local Board of Health should be consulted for approval of existing pre-cast concrete tank for holding sanitary sewage until removal, and disposal of contents with no underground injection, or on-site discharge.
CRITERIA:	310 CMR 15.18, Miscellaneous Disposal, (State Environmental Code Title V: Minimum Requirements for the Subsurface Disposal of Sanitary Sewage) requires application for a "tight tank" permit from the local Board to Health.
SOLUTION:	Project Manager should contact local Board of Health to arrange for inspection of sanitary sewage holding tank.

POINT SOURCE DISCHARGES AND STORMWATER DISCHARGES:

The navigation opening and harbor barrier and dike have no point source discharges or discharges to public wastewater treatment facilities. At the Federally operated and maintained portion of the project, stormwater drainage facilities consist of 4-gated conduits along the dike, and two sump pumps below the navigation gate that lift service tunnel seepage from elevation -55 feet NGVD to a discharge point at the control house. Discharge is to the harbor. The locally operated and maintained portions of the project include street gates and pumping stations, which were not inspected.

VEHICLE FLOOR DRAINS:

FINDING: There are no vehicle floor drains or vehicle maintenance garages at the New Bedford Hurricane Barrier

WATER QUALITY MANAGEMENT

POTABLE WATER PROGRAM:

There is no potable water supply at the New Bedford Hurricane Barrier. Project Manager reported that he purchase bottled drinking water for use as potable water.

BEACH WATER QUALITY MONITORING PROGRAM:

The Corps does not operate or maintain any swimming area at the New Bedford Hurricane Barrier.

WATER QUALITY PROGRAM:

The New Bedford Hurricane Barrier is not included in the NED water quality program. This facility is located in the Acushnet River Estuary. Fishing for human consumption is prohibited in the Acushnet River and New Bedford Harbor, subject to EPA Superfund remediation of PCB contamination. The Corps maintains a Federally authorized channel in the New Bedford Harbor. This harbor and channel has not been dredged since 1953, however, dredging is scheduled in the near term.

FLOATING PLANT MANAGEMENT

FINDING: There were no Floating Plant Management findings at the New Bedford Hurricane Barrier.

NEW ENGLAND DIVISION ERGO TEAM

Bruce Williams - Program Manager
Operations Directorate
Environmental Compliance Coordinator - NED
Member, NED's Water Quality Team

Jim Law
Operations Directorate

Mike Penko
Planning Directorate
Endangered Species Coordinator - NED

Vicky Volz
Engineering Directorate

Jim Peck
Safety and Occupational Health Office
Safety Manager - NED

Anne Laster
Real Estate Directorate

Cape Cod Canal ERGO Team

F. N. Ciccone - Engineer in Charge
Steve Andon - Assistant Engineer in Charge
F. J. MacDonald Jr. - Administrative Officer
Matthew McClintock - Park Ranger

New Bedford Hurricane Barrier

Robert Rousseau - Flood Control Project Manager
Dennis Arsenault - Maintenance Worker

Appendix A

CENED-OD-C 16 March 1994

MEMORANDUM THRU Director, Operations Directorate, U.S. Army Engineer Division, NED, 424 Trapelo Road, Waltham MA 02254-9149

FOR Project Operation and Readiness Division, ATTN: Ms. Hamel, U.S. Army Engineer Division, NED, 424 Trapelo Road, Waltham MA 02254-9149

SUBJECT: Environmental Compliance Pre-Assessment New Bedford Hurricane Barrier

1. Enclosed is the completed ERGO pre-assessment for the New Bedford Hurricane Barrier.

2. For additional information contact Mr. Francis J. MacDonald Jr, Administrative Officer, (508) 759-4431.

F.N. CICCONE
Engineer In Charge

cc
Canal File
Reading File

ENVIRONMENTAL COMPLIANCE PRE-ASSESSMENT

New Bedford Hurricane Barrier

PRELIMINARY FINDINGS REPORT
U.S.Army Corps of Engineers
New England Division

For Inter Corps Office Distribution only

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SECTION 1 - AIR EMISSIONS MANAGEMENT

FINDING: NONE

SECTION 2 - CULTURAL RESOURCES

FINDING: NONE

SECTION 3 - HAZARDOUS MATERIAL MANAGEMENT

POSITIVE FINDING: NONE

SIGNIFICANT FINDING: NONE

MAJOR FINDING: NONE

MINOR FINDING: NONE

MANAGEMENT FINDINGS:

3.4

CONDITION: Master list of storage areas for hazardous materials is not available.

CRITERIA: Facility is to have a Master List of areas in which hazardous materials are stored at the facility and a copy of master list is to be kept on file at Cape Cod Canal field office.

SOLUTION: Listing to be prepared by the Flood Control Project Manager.

3.6

CONDITION: Facility does not have a written Oil and Hazardous Substance Contingency Plan.

CRITERIA: Facility is to have plan which includes the following items: identification of all haz. substance storage areas, designated indiv. to initiate spill response, periodic drills, spill cleanup equipment, emergency medical procedures, emergency phone numbers, decontamination procedures, etc.

SOLUTION: Plans are being developed by the Project Personnel with assistance from Cape Cod Canal Resource Management Section. They will be included in the Federal Response Plan and the Flood Emergency Plan.

PRE-ASSESMENT FINDINGS TABLE
for
NEW BEDFORD HURRICANE BARRIER

COMPLIANCE CATEGORY	FINDINGS			
	SIG.	MAJ.	MIN.	MGT.
Air Emissions				
Cultural and Historic Resources Management				
Hazardous Material Management				3
Hazardous Waste Management				
Natural Resources Management				1
Pesticide Management				
Petroleum Oil and Lubricant (POL) Management			1	
Solid Waste Management				
Special Pollutants Management (Radon,Asbestos,PCB's,Noise)				
Underground Storage Tanks (UST) Management				
Wastewater Management				
Water Quality Management				
Totals	0	0	1	4

SECTION 3 - HAZARDOUS MATERIAL MANAGEMENT (Cont'd)

3.7

CONDITION: Facility has not provided the local fire department with Material Safety Data Sheet (MSDS) for all hazardous chemicals stored at site.

CRITERIA: (40 CFR 1910.1200 (g) (1) and 1910.1200 (g)(8), EM 385-1-1 para 13.G.02) MSDS should be provided to both Fairhaven and New Bedford Fire Departments.

SOLUTION: Flood Control Manager to provided copies of MSDS sheets to both fire departments.

COMMENTS: MSDSs needed to assure proper product use and to mitigate harmful effects.

SECTION 4 - HAZARDOUS WASTE MANAGEMENT

FINDING: None

SECTION 5 - NATURAL RESOURCES MANAGEMENT

POSITIVE FINDING: NONE

SIGNIFICANT FINDING: NONE

MAJOR FINDING: NONE

MINOR FINDING: NONE

MANAGEMENT FINDINGS:

5.5

CONDITION: Project OMP (Operations Management Plan) has not been developed in coordination with the planning, real estate and safety elements of the project.

CRITERIA: All Corps facilities (including Navigation Projects) are required to develop and maintain a project operational managemental plan (OMP). (ER 1130-2-400 para.6 and para.9 through 11 Appendix B.)

SOLUTION: 1) Develop an OMP in accordance with ER 1130-2-400 and assure that it addresses all operational projects in the Master Plan (ER 1130-2-435).
2) Verify that the OMP has been approved by the Division Commander.
3) Verify that the OMP is updated as required.

SECTION 6 - PESTICIDE MANAGEMENT

FINDING: NONE

SECTION 7 - PETROLEUM, OIL AND LUBRICANT (POL) MANAGEMENT

POSITIVE FINDING: NONE

SIGNIFICANT FINDING: NONE

MAJOR FINDING: NONE

MINOR FINDING: NONE

7.3

CONDITION: Fuel is stored in aboveground fuel tanks located at both compressor building sites and in New Bedford Abutment building. No secondary containment is present.

CRITERIA: Above ground stroage tanks shall be diked or curbed, or other suitable means provided to prevent the spread of liquids in case of leakage in tank or piping. Such dike or curbed area shall have a capacity at least equal in volume to that of the largest tank plus 10% (EM 385-1-1 12.D.13.).

SOLUTION: Flood Control Project Manager to initiate action to dike fuel storage areas.

SECTION 8 - SOLID WASTE MANAGEMENT

FINDING: NONE

SECTION 9 - SPECIAL POLLUTANTS MANAGEMENT

FINDINGS: NONE

SECTION 10 - UNDERGROUND STORAGE TANK (UST) MANAGEMENT

FINDING: NONE

SECTION 11 - WASTEWATER MANAGEMENT

FINDING: NONE

SECTION 12 - WATER QUALITY MANAGEMENT

FINDING: NONE

SECTION 13 - FLOATING PLANT MANGEMENT

FINDINGS: NONE

CAPE COD CANAL FIELD OFFICE

ERGO PRE-ASSESMENT TEAM

F. N. Ciccone, Team Leader
Engineer in Charge
Cape Cod Canal

Robert Rousseau
Flood Control Project Manager
New Bedford Hurricane Barrier

Matthew McClintock
Park Ranger
Cape Cod Canal

F. J. MacDonald Jr.
Administrative Officer
Cape Cod Canal

Appendix B

CENED-OD-P 12 June 1992

MEMORANDUM FOR NED Executive Staff

SUBJECT: NED Environmental Compliance Coordinator

1. In January 1991, John Elmore, Chief, Operations, Construction and Readiness Division, directed division and district operations offices to formally designate Environmental Compliance Coordinators (ECC's). The Director of Operations designated Bruce Williams, Project Operations and Readiness Division as the New England Division ECC.

2. In a follow-up memo dated 31 March 1992, The Director of Civil Works expanded the role of the Environmental Compliance Coordinators to be utilized as division or district environmental coordinators. This is a coordination, as opposed to an operative assignment. The ECC's will support rather than assume environmental compliance responsibilities of the various functional elements (Planning, Engineering, Project Program Management, Logistics, Safety and Occupational Health, and Real Estate, etc.).

3. The Corps of Engineer objective is to develop and maintain a comprehensive and consistent environmental compliance program utilizing the existing Operations "stovepipe", since Operations is responsible for the majority of Corps facilities. In the future, the ECC should be included in the review process of programs or projects that involve environmental compliance as part of the construction, operation or maintenance activities at Corps owned or operated facilities and projects.

4. As a part of the USACE Facilities Environmental Compliance Program, the Director of Civil Works recommended that Commanders should also establish and chair an interdisciplinary Environmental Compliance Steering Committee with representatives from the various affected offices throughout NED. Rather than develop parallel organizations performing the same function, I am tasking the NED Executive Staff to serve an additional function as the Environmental Compliance Steering Committee. The Director of Operations will provide direction and oversight to the ECC and overall coordination with NED Executive Staff.

JAMES K. HUGHES
LTC, EN
Commanding

cf:
Distribution "A"
Bruce Williams ECC

DEPARTMENT OF THE ARMY
U.S. Army Corps of Engineers
WASHINGTON, D.C. 20314-1000

20 DEC 1991

REPLY TO
ATTENTION OF:

10 January 1992

CECW-ON

MEMORANDUM FOR MAJOR SUBORDINATE COMMANDS

SUBJECT: FY 92 Environmental Assessments at Operating Projects

1. As managers of over 400 water resources projects and stewards of 11.7 million acres of land and water, we individually and corporately have an ethical and legal responsibility to protect the environment. Your positive response to the Environmental Review Guide for Operations (ERGO) we distributed last January is appreciated. We are now ready to proceed with an organization-wide series of ERGO assessments. The FY 92 target is to complete ERGO assessments at 25 percent of our O&M General funded operating projects and facilities. The remainder will be assessed within the following two years. Assessments of facilities and projects operated with other than O&M General funds will be addressed by separate memorandum.

2. As an indication of the importance of this effort, we are providing dedicated O&M funding from headquarters to insure that these assessments are completed. Enclosed is a list of funds available for allocation to each division. These funds are for conducting assessments and converting findings into corrective action plans. Corrective actions are to be implemented through routine budgeting and reprogramming procedures. We ask that you respond with a list of projects, by district, at which ERGO evaluations will be conducted in FY 92, and the portion of your division's total allocation we should distribute to each project on your list. Include the CWIS number with each project you identify. Please respond to Denise White of our Natural Resources Management Branch (CECW-ON) by 10 January 1992.

3. In selecting projects and facilities for FY 92 assessments, we recommend that you concentrate on locations having the greatest potential for significant compliance shortfalls. When evaluating projects, evaluate all functions (hydropower, recreation, etc.) at the same time, to obtain comprehensive project assessments and action plans.

4. Our overall FY 92 budget for ERGO assessments is based on an estimated average cost of $13K per project. To contain costs, use ERGO in conjunction with the representative sampling techniques presented at the Kansas City and Dallas ERGO orientation sessions.

Contact Dr. Diane Mann of Construction Engineering Research Laboratory (CERL) at 217-373-6741 for help in designing representative sampling formats.

5. ERGO was developed as a self-assessment tool for managers of operating projects, with district teams, state agencies, and contractors as potential sources of support. Because of the complexity of the laws and regulations, several respondents from the FY 91 effort commented on the benefits of inter disciplinary teams, including representation from offices such as Engineering, Logistics, Planning, Real Estate, and Safety and Occupational Health. While we are not specifying the way this first round of assessments is to be conducted, we are requiring the involvement, to the extent possible, of personnel from the project or facility being assessed to maximize training benefits. We are also emphasizing quality products that will withstand independent scrutiny.

6. Real Estate is responsible for reviewing user compliance with real estate instrument provisions, and reviewing environmental compliance clauses in such outgrants. ERGO is designed to apply to operating projects and facilities, including outgrants. We understand that in some locations the concept of applying ERGO to outgrants and concessions is surfacing unanticipated issues. Outgrant related issues will be addressed at the joint Real Estate/Natural Resources Meeting scheduled for January 1992. Please be sure that your representatives come to that meeting with complete and current information, both positive and negative. More specific guidance will be issued following that meeting.

7. In January 1992, we will distribute an updated ERGO manual reflecting FY 91 user feedback and incorporating new and revised laws and regulations. As you proceed with ERGO assessments in FY 92, it is especially important that you record "lessons learned" and track costs per assessment, including report and action plan development costs.

8. In support of our commitment to promote environmental compliance at all levels and functions, we have tasked CERL with developing and conducting ERGO orientation programs at our districts during the FY 92/93 time frame. A video based ERGO training course has also been approved for development by Huntsville Division. Additional information will be provided as these projects progress.

CECW-ON
SUBJECT: FY 92 Environmental Assessments at Operating Projects

9. Periodic EAGO assessments are the foundation of our environmental compliance program and your comments and recommendations are welcome at any time. They can be directed to Denise White at 202-272-0794.

FOR THE DIRECTOR OF CIVIL WORKS:

Encl

JOHN P. ELMORE, P.E.
Chief, Operations, Construction
and Readiness Division
Directorate of Civil Works

ENVIRONMENTAL REVIEW GUIDE FOR OPERATIONS (ERGO)

FISCAL YEAR 92 BUDGET DISTRIBUTION

The following is a listing of funding distribution in thousands of dollars to division offices for performing ERGO assessments. **NOTE:** Construction General (CG) and Mississippi River and Tributaries (MR&T) funded projects were not considered.

Division	Amount
LMD	145.0
MRD	105.0
NAD	95.0
NCD	210.0
NED	105.0
NPD	130.0
ORD	455.0
SAD	185.0
SPD	65.0
SWD	430.0
TOTAL	1,925.0

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
KINGMAN BUILDING
FORT BELVOIR, VA 22060-

REPLY TO
ATTENTION OF:

CEIG-I (20-1g)

17 DEC 1991

MEMORANDUM FOR ALL DISTRICT AND DIVISION COMMANDERS

SUBJECT: Environmental Compliance Concerns Within USACE

1. Earlier this year my office completed a systemic inspection of environmental compliance on lands controlled by USACE. A copy of this report has been recently distributed to your command and should be reviewed by you and members of your staff. We reported to the Chief that compliance problems exist across USACE with the many Federal, State and local environmental laws. We found at HQUSACE, and throughout the Corps:

a. Organizational confusion as to who was in charge of environmental compliance.

b. Lack of comprehensive guidance.

c. Lack of Corps-wide policy on disposal of our hazardous materials and hazardous waste.

d. Training shortfalls.

e. Inadequate environmental assessment/inspection on lands we control.

f. Failure to program resources to insure environmental compliance.

g. Problems with environmental compliance on Corps lands leased to others for use.

h. Unfulfilled commitments to mitigate environmental impact on many Corps projects.

2. Our inspection teams visited fourteen districts in eight divisions and a laboratory. Inspectors physically toured over 240 different sites. They found compliance issues at virtually every site visited. Enclosed are pictures of <u>typical</u> findings.

3. I would like to emphasize that the situations shown in the pictures are typical and were not found at only one location or in any one particular district. Rather, they are likely to exist at any site or possibly at every site. I urge you and your staff to make it a special point to visit all land under your jurisdiction, especially lands leased and outgranted to others, with a keen eye to discover any environmental compliance

violations or problems. You then need to follow through and insure resources are programed and dedicated to correct these problems in a timely fashion.

4. The U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) is available to answer environmental questions at 1-800 USA EVHL. My POC for this action is LTC Dan Shuey or LTC Fred Streb at Commercial (703)355-3575 or DSN 345-3575.

FOR THE COMMANDER:

Encl

GERALD M. TIPPINS
Colonel, IG
The Engineer Inspector General

CF:
CECER
CECRL
CETEC
CEWES
CEHSC
CETHA
CECW-ZA (MG Williams)
CECW-O (Mr. Elmore

ENVIRONMENTAL INSPECTION PHOTOGRAPHS

Photograph 1

Storage Area

Area of Concern:

1. Violation of RCRA, CERCLA, and TSCA

2. Soil Contamination

3. Improper storage/disposal of HTW

Photograph 2

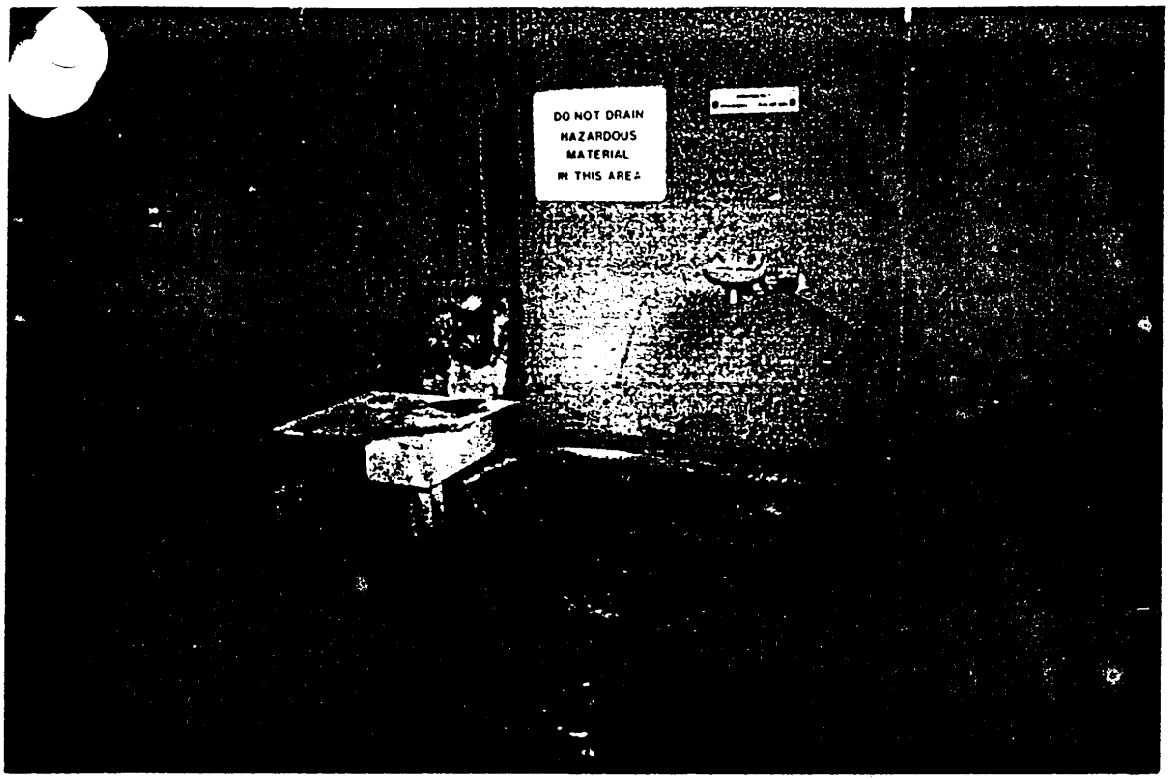
Maint. & Paint Shop

Area of Concern:

1. Violation of CWA

2. Requires NPDES permit

3. Discharge of Hazardous waste into reported storm drain



Photograph 3

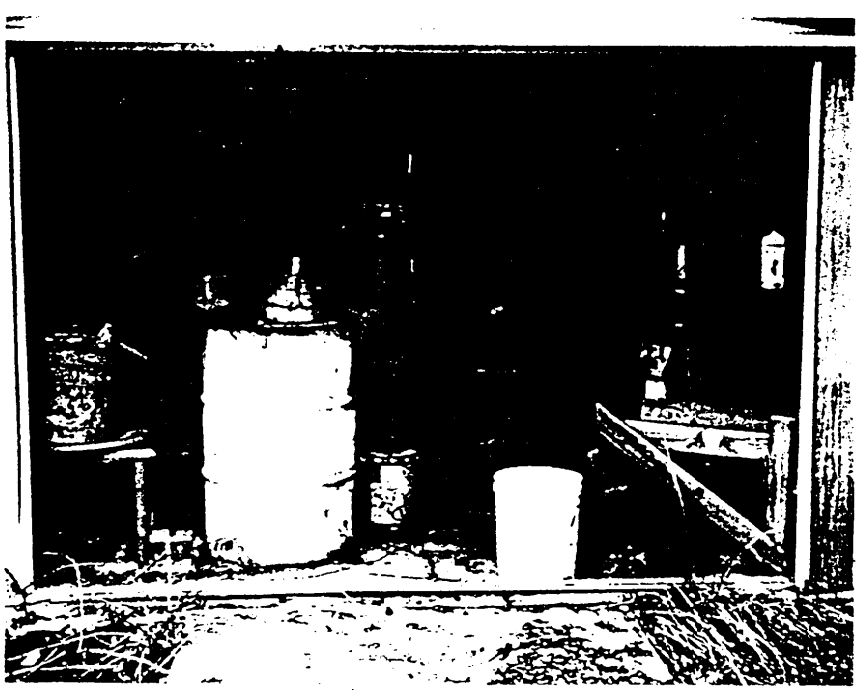
Maint. & Paint Storage Area

Area of concern:

1. Violation of RCRA and CWA

2. NPDES permit required

3. Discharge of Hazardous Material into reported storm drain



Photograph 4

Used Oil Storage Area

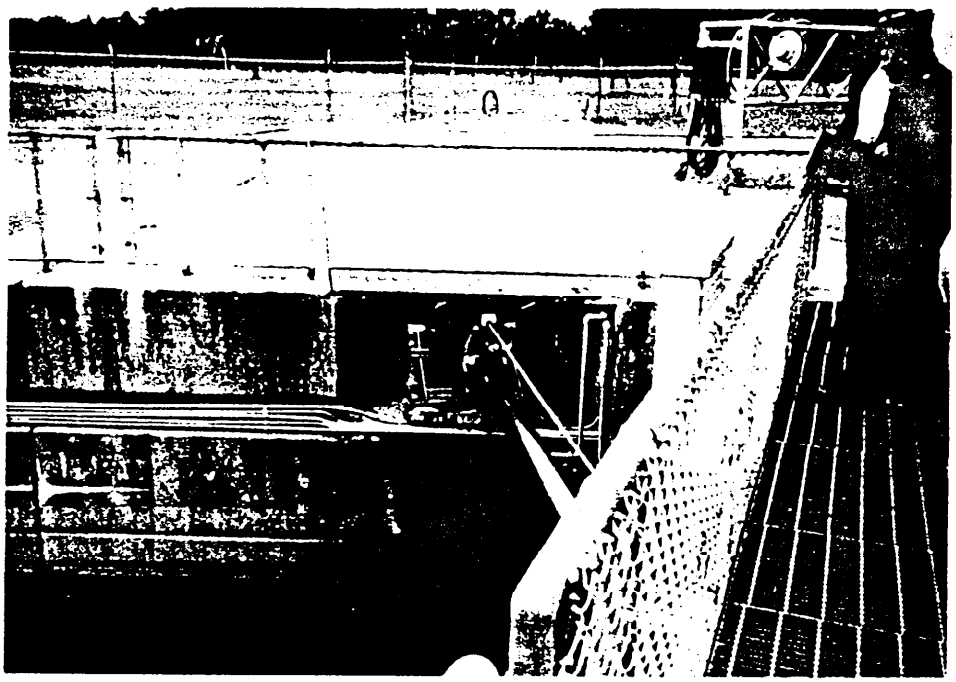
Area of Concern:

1. Violation of RCRA

2. Soil contamination

3. Requires spill contingency plan

4. Housekeeping



Photograph 5

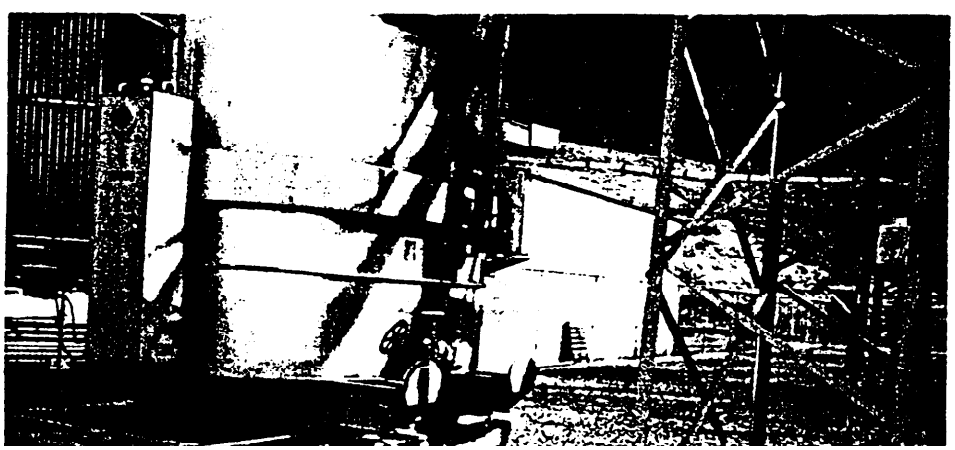
Lock and Dam

Area of Concern:

1. Violation of CWA

2. Spill prevention plan

3. Contamination of project waters



Photograph 6

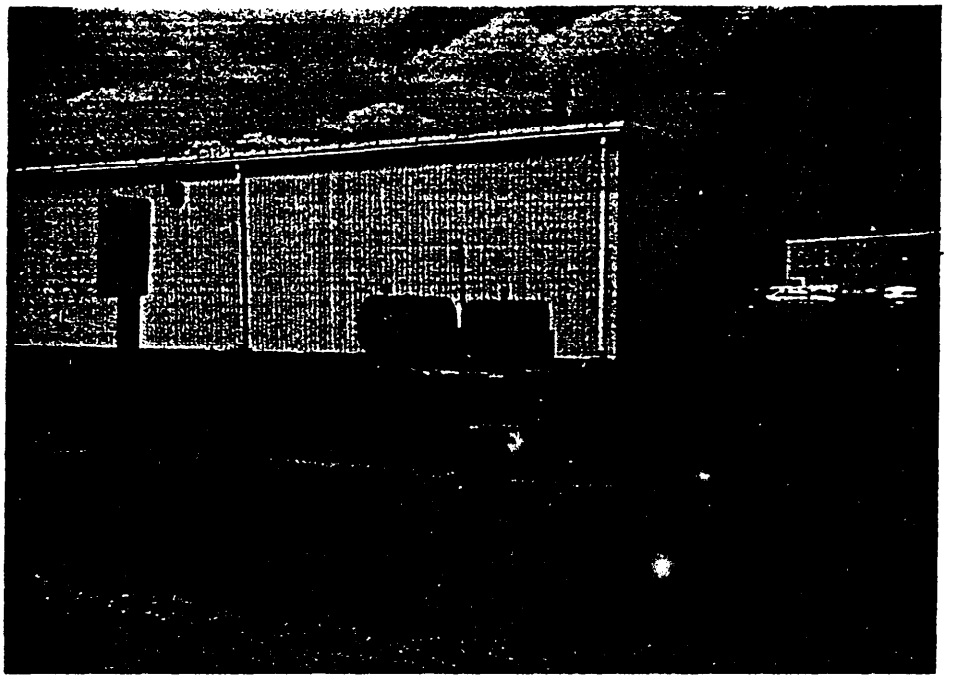
Hydropower Plant Transformers

Area of Concern:

1. Violation of CWA and CERCLA

2. Soil contamination

3. Discharge of



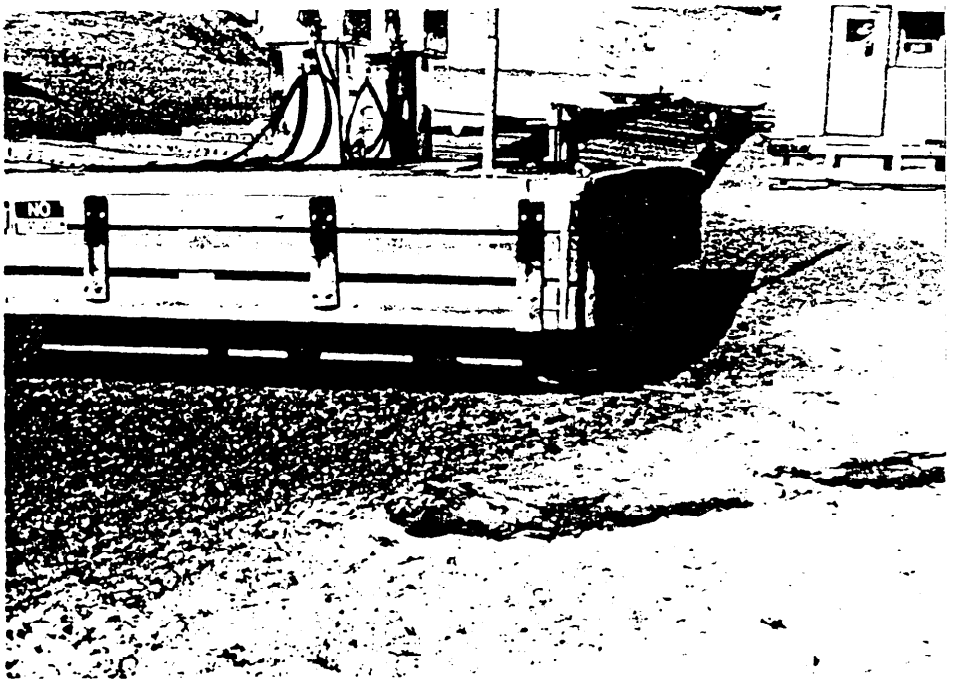
Photograph 7

Diesel Oil Storage Tanks

Area of Concern:

1. Soil contamination

2. Location of storm drain requires spill contingency plan



Photograph 8

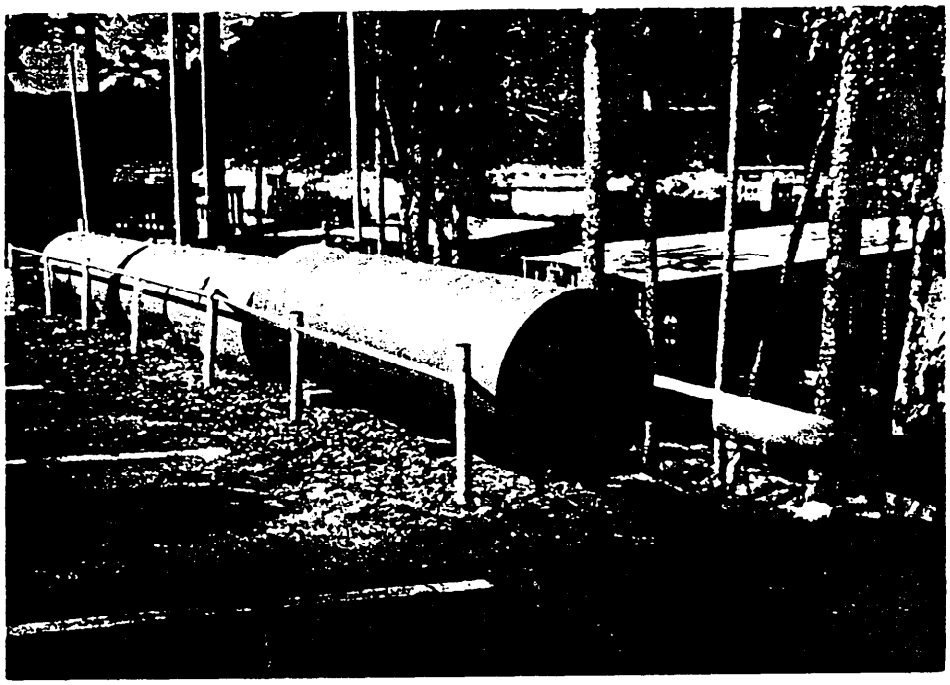
Gasoline Dispensers in a Marina.

Area of Concern:

1. Violation of CWA

2. Contamination of project waters

3. Lack of environmental compliance/enforcement on real estate lease



Photograph 9

Fuel Storage Area in Marina.

Area of Concern:

1. Violation of CWA

2. Requires spill contingency plan

3. Lack of environmental compliance/enforcement on real estate lease

Photograph 10

Dispensing Area

Area of Concern:

1. Soil contamination

2. Spill contingency plan

3. Housekeeping

Photograph 11

Solid Waste Disposal site

Area of Concern:

1. Violation of solid waste disposal regulations

2. Creosote timbers: Violation of CERCLA

3. Potential NPL site

Photograph 12

Used Drums & Metal Storage Area

Area of Concern:

1. Violation of RCRA and solid waste regulations

2. Soil contamination

3. Improper storage of HTW

4. Lease enforcement

Photograph 13

Storage/Wash and Fuel Transfer Site

Area of Concern:

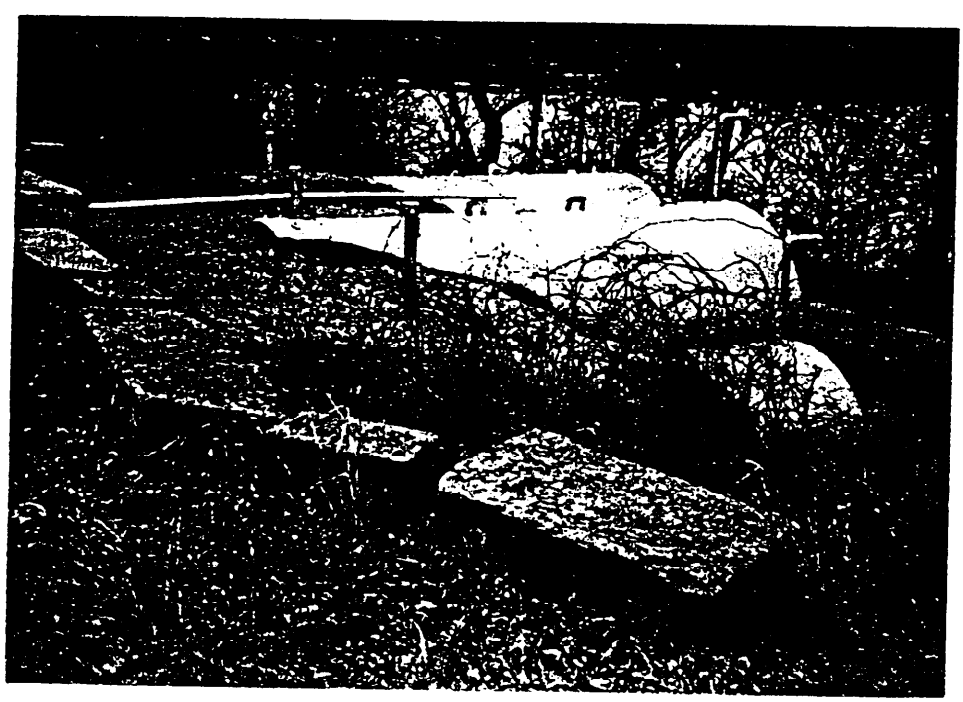
1. Violation of RCRA and CERCLA

2. Soil contamination

3. Requires spill contingency plan

4. Improper storage of hazardous materials

5. Housekeeping



Photograph 14

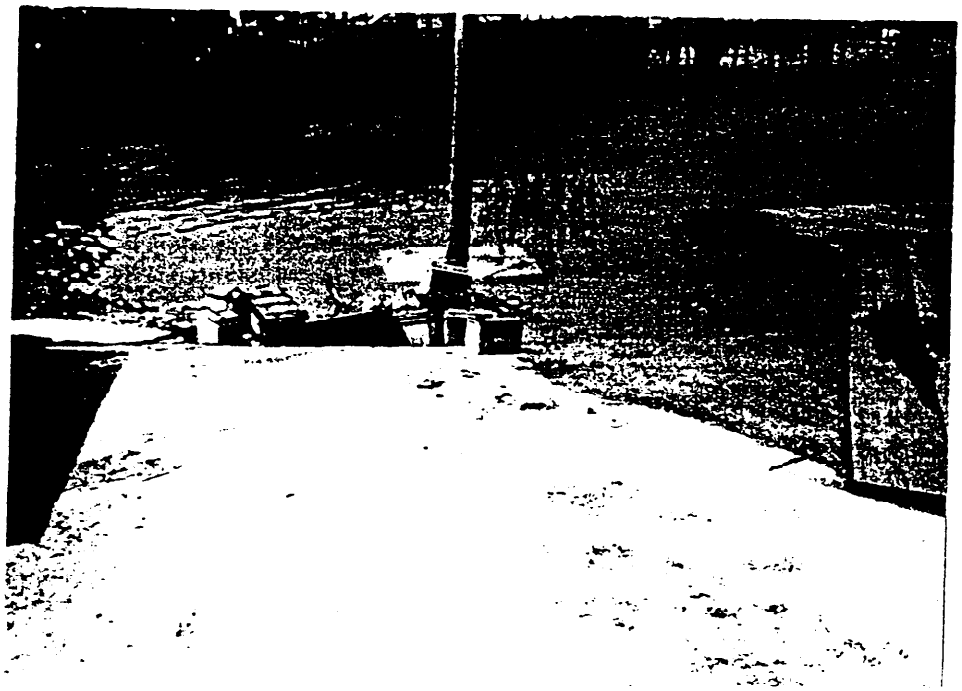
Fuel Storage Area

Areas of Concern:

1. Violation of RCRA and CWA

2. Requires spill contingency plan

3. Underground fuel storage tank requirements



Photograph 15

Batteries Storage Area

Area of concern:

1. Violation of CWA, CERCLA

2. Contamination of Project Waters

3. Lease enforcement

Photograph 16

Contractor's Storage Tank

Area of Concern:

1. Violation of CWA

2. Soil contamination

3. Enforcement of Contract Requirements for Environmental Compliance.

4. Spill contingency plan

Photograph 17

Oil Rights Outgrant

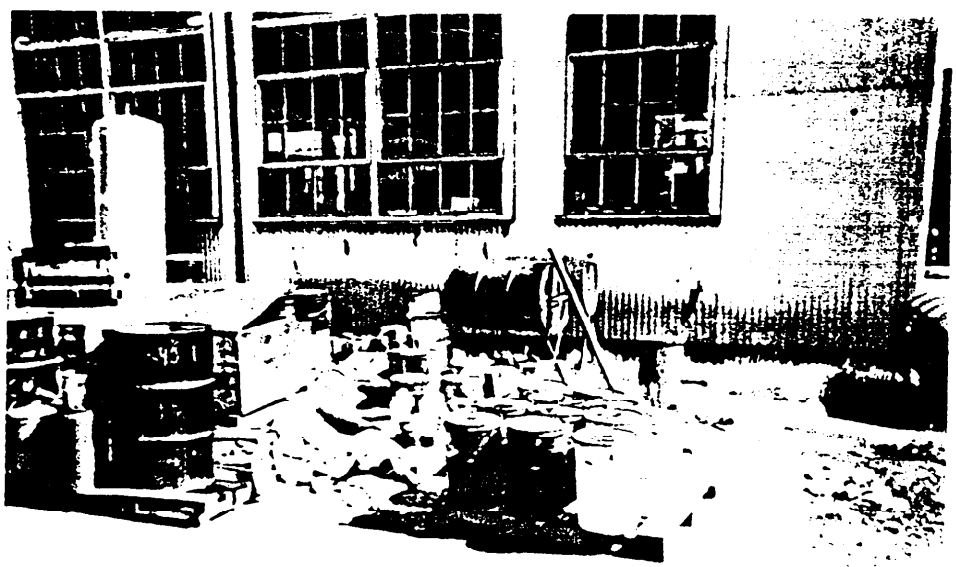
Area of Concern:

1. Violation of RCRA, CWA

2. Soil Contamination

3. Lease enforcement

4. Spill contingency plan



Photograph 18

Oil, Paint Storage Area

Area of Concern:

1. Violation of RCRA

2. Improper storage of HTW

3. Soil contamination

4. Housekeeping

5. Spill contingency plan

Photograph 19

Paint, Oil Storage Area

Area of Concern:

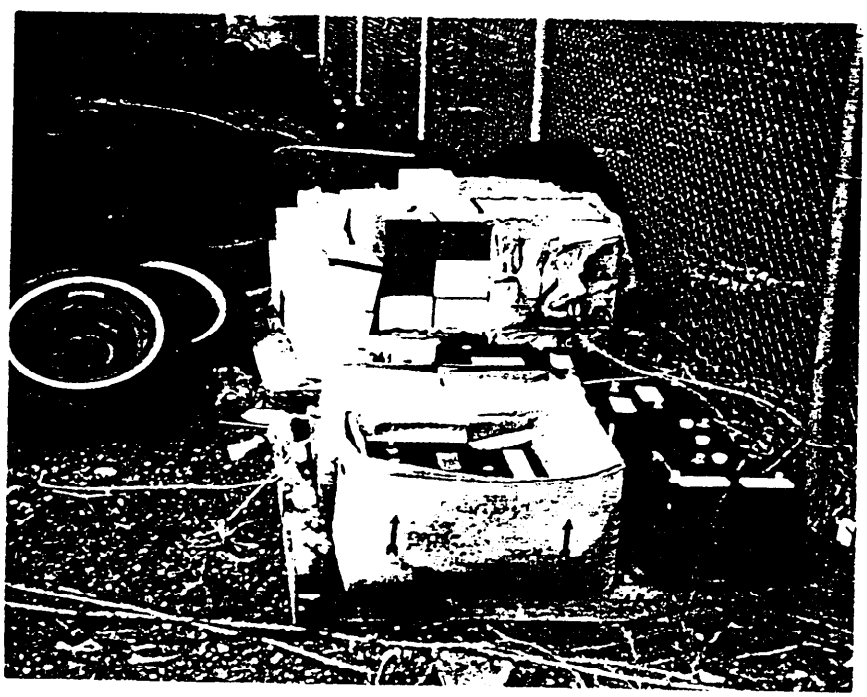
1. Violation of RCRA, CERCLA

2. Soil contamination

3. Improper storage/disposal of HTW

4. Housekeeping

5. Spill contingency plan



Photograph 20

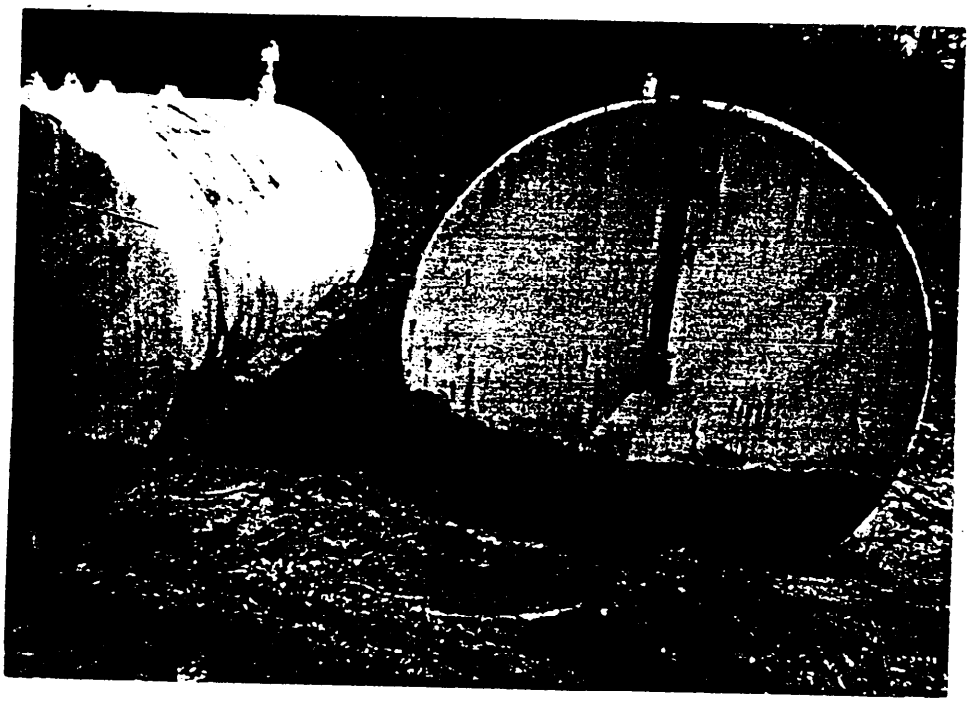
Batteries Storage Area

Area of Concern:

1. Violation of RCRA, CERCLA

2. Improper storage/disposal of HTW

3. Spill contingency plan



Photograph 21

Fuel Tanks

Area of Concern:

1. Violation of RCRA

2. Spill contingency

Photograph 22

Contractor's Fuel Dispensing Area

Area of Concern:

1. Soil contamination

2. Poor housekeeping

3. Spill contingency plan

Appendix C

ENVIRONMENTAL COMPLIANCE

ABBREVIATION LIST

CAA	-	Clean Air Act
CFR	-	Code of Federal Regulations
CO	-	Carbon Monoxide
CWA	-	Clean Water Act
DoD	-	Department of Defense
ECC	-	Environmental Compliance Coordinator
EPA	-	Environmental Protection Agency
ECAS	-	Environmental Compliance Assessment System
ERGO	-	Environmental Review Guide for Operations
FIFRA	-	Federal Insecticide, Fungicide, and Rodenticide Act
FWS	-	U.S. Fish and Wildlife Service
MP	-	Management Practice
MSDS	-	Material Safety Data Sheet
NAAQS	-	National Ambient Air Quality Standards
NEPA	-	National Environmental Policy Act
NFPA	-	National Fire Protection Act
NHPA	-	National Historic Preservation Act
NHRM	-	Natural and Historic Resources Management
NO^X	-	Nitrogen Oxides
NPDES	-	National Pollutant Discharge Elimination System
NRM	-	Natural Resources Management
OHSPC	-	Oil and Hazardous Substances Pollution Contingency Plan
OMP	-	Operational Management Plan
PCB's	-	Polychlorinated Biphenyls
pCi/L	-	picoCurie per Liter
PMP	-	Pest Management Plan
POL	-	Petroleum Based Fuel or Lubricant
PPM	-	Parts Per Million
RCRA	-	Resource Conservation and Recovery Act
SARA	-	Superfund Amendments and Reauthorization Act of 1986
SDWA	-	Safe Drinking Water Act
SHPO	-	State Historic Preservation Officer
SPCC	-	Spill Prevention Control and Countermeasures
TCLP	-	Toxic Constituent Leaching Procedure
TSCA	-	Toxic Substances Control Act
TSDF	-	Treatment, Storage, and Disposal Facility
UFO	-	Unidentified Flying Object
USACE	-	U. S. Army Corps of Engineers
UST	-	Underground Storage Tanks
VOC	-	Volatile Organic Compound

Appendix D

Radon Results

Serial No.	Avg. Radon Conc.	Location
#1562663	24.90	Hodges (Duplicate Basin Office Basement)
#1562677	22.60	Hodges, Basin Office Basement
#1559270	20.10	Hodges, Utility Bldg
#1561991	12.00	*Spike #2
#1562036	11.30	Thomaston, Control Tower
#1562078	11.20	Hodges Basin Office, Upstairs
#1559283	10.80	West Thompson, Control Tower #2
#1562079	10.10	Hop Brook Base Tower
#1562021	7.90	*Spike #5
#1561997	7.50	*Spike #3
#1562006	6.40	Tully, Basin Office #1
#1562077	6.30	Franklin, Coleman Storage Building
#1561992	6.30	Hopkinton, Gate House 2nd Floor
#1559276	6.30	West Thompson, Utility Bldg
#1562041	6.20	Franklin, Basin Office Basement
#1562018	5.70	Franklin, Working level of Utility Bldg
#1559262	5.30	Otter Brook Gatehouse
#1562052	5.00	Black Rock, Control Tower
#1562086	4.70	Otter Brook Quarters Basement
#1562712	4.60	Buffumville, Storage Bldg Basement
#1562001	4.50	Franklin, Basin Office Working Level
#1559287	4.10	Buffumville, Dam Gallery #2
#1562024	4.00	Blackwater Gate Chambers
#1559284	3.90	Barre Environmental Lab
#1562730	3.90	Barre Environmental Offices
#1562013	3.90	Franklin, Basement of Utility Bldg
#1562054	3.90	Thomaston, Asst. PM Residence
#1562034	3.80	*Spike #6
#1562666	3.70	Buffumville Gate House, Lower Level
#1559292	3.70	Buffumville, Dam Gallery #1
#1562016	3.60	*Spike #1
#1562051	3.40	Black Rock, Duplicate Utility Bldg
#1562698	3.30	Barre, Utility Bldg
#1562070	3.10	Mansfield, Living Quarters Basement
#1562008	3.00	*Spike #4
#1562020	3.00	Knightville, Lee House Basement
#1562030	2.90	Birch Hill Old Quarters Working Level
#1562015	2.90	Franklin, Seven Stall Garage
#1559278	2.70	Townshend Gatehouse
#1561993	2.60	Buffumville Utility Building
#1559280	2.50	Cape Cod Canal, Warehouse
#1559286	2.50	Tully, Duplicate Utility Bldg
#1562085	2.50	West Thompson, Living Quarters Basement
#1559285	2.50	Westville, Gallery #1
#1559281	2.40	West Hill, New Utility Bldg
#1559294	2.30	East Brimfield, Office
#1560409	2.30	Franklin, Duplicate Seven Stall Garage

#1562064	2.30	MacDowell, Bottom of Gatehouse
#1561995	2.30	Otter Brook Quarters
#1559268	2.20	Mansfield, Gate House
#1562715	2.20	Union Village Utility Bldg
#1562697	2.10	Ball Mountain Gatehouse
#1559269	2.10	Black Rock, Utility Bldg
#1562720	2.10	East Brimfield, Control Tower
#1559255	2.10	Surry Gatehouse
#1562724	2.10	Westville, Gallery #2
#1562049	2.00	Birch Hill, Old Quarters Basement
#1562048	2.00	Knightville, Lee House 1st Level
#1562676	2.00	Knightville, Utility Bldg
#1562723	2.00	North Hartland Gatehouse
#1562708	2.00	Tully, Gatehouse
#1559265	2.00	Union Village Duplicate Gatehouse
#1562726	1.90	Westville, Duplicate, Control Tower
#1562658	1.80	Hodges, Control Tower
#1562673	1.80	Otter Brook Utility Bldg
#1559288	1.80	Westville, Control Tower
#1561989	1.70	Buffumville Living Quarters Basement
#1561994	1.70	East Brimfield, Quarters Basement
#1562058	1.60	Ball Mountain Quarters Basement
#1562010	1.60	Everett, Bottom of Gate House
#1562023	1.60	Hopkinton, Working level of Gate House
#1559293	1.60	Littleville, Utility Bldg
#1562701	1.60	Union Village Gatehouse
#1562083	1.50	Hop Brook, Control Tower
#1559295	1.50	Littleville, Water Supply Tower #2
#1562076	1.50	MacDowell, Basement of Utility Bldg
#1559290	1.40	Mansfield, Living Quarters
#1562707	1.30	Barre, Gatehouse #1
#1562057	1.30	Blackwater Old Storage Building
#1559277	1.30	Tully, Utility Bldg #2
#1562028	1.20	Barre, Duplicate of Quarters #1
#1562067	1.20	Colebrook, Control Tower
#1562060	1.20	Westville, Utility Bldg
#1562681	1.10	Barre, Quarters #2
#1562670	1.10	Birch Hill, Gatehouse #1
#1562053	1.10	Hopkinton, Basement of Operator's Quarters
#1562699	1.10	Townshend Utility Bldg
#1562713	1.00	Barre, Gatehouse #2
#1562074	1.00	Blackwater Utility Bldg
#1561996	1.00	Hopkinton, Utility Bldg
#1562685	1.00	Littleville, Duplicate Flood Control Tower
#1562687	1.00	Littleville, Flood Control Tower #2
#1562056	1.00	MacDowell, Working Level of Gate House
#1562071	1.00	Thomaston, Utility Bldg
#1562664	0.90	Birch Hill, Gatehouse #2

#1562718	0.90	Buffumville, Living Quarters Duplicate
#1562059	0.90	Colebrook, Utility Bldg
#1559279	0.90	East Brimfield, Quarters
#1561986	0.90	Franklin, Bottom of Gate House
#1559272	0.90	North Hartland Utility Building
#1559274	0.90	North Springfield Gatehouse
#1562704	0.90	Tully, Utility Bldg #1
#1559263	0.80	Buffumville, Living Quarters
#1562659	0.80	East Brimfield, Storage Bldg
#1559282	0.80	Knightville, Gatehouse
#1562662	0.80	Littleville, Water Supply Tower #1
#1562679	0.70	Barre, Quarters #1
#1562719	0.70	Birch Hill, Utility Bldg
#1562073	0.70	Blackwater Working Level of Gatehouse
#1562005	0.70	Hodges, Lower Level of Control Tower
#1562717	0.70	Littleville, Flood Control Tower #1
#1562043	0.70	MacDowell Duplicate Basement of Utility Blc
#1562035	0.70	West Hill Gauge Building
#1562716	0.70	West Thompson, Control Tower #1
#1562017	0.60	Tully, Basin Office #2
#1562678	0.60	West Thompson, Living Quarters
#1562045	0.60	Westville, Storage Bldg #1
#1561999	0.50	Franklin, Working Level of Gate House
#1560412	0.50	Hopkinton, Working Level of Operator's Qrtrs
#1562047	0.50	MacDowell, Basement of Old Operators Qrtrs
#1559267	0.50	Surry Utility Bldg
#1562000	0.40	Cape Cod Canal, Extra
#1562007	0.40	Cape Cod Canal, Extra
#1562039	0.40	Hop Brook, Basin Office 2nd Floor
#1562038	0.40	MacDowell, Working Level of Operator's Qrts
#1562072	0.30	*Field Blank #1
#1561998	0.30	*Field Blank #2
#1562019	0.30	*Field Blank #3
#1562080	0.30	Ball Mountain Quarters
#1562727	0.30	Ball Mountain Utility Bldg
#1562061	0.30	Blackwater New Storage Building
#1559273	0.30	Cape Cod Canal Admin Bldg #1
#1559271	0.30	Cape Cod Canal, Admin Bldg #2
#1562722	0.30	Cape Cod Canal, Duplicate Warehouse
#1559266	0.30	Cape Cod Canal, Garage
#1559256	0.30	Cape Cod Canal, Maintenance Bldg
#1562066	0.30	Hop Brook, Basin Office 1st Floor
#1562037	0.30	Hop Brook, Utility Bldg
#1562014	0.30	Hopkinton Storage Bldg
#1562031	0.30	Hopkinton, Duplicate Working Level Op Qrtrs
#1562068	0.30	Hopkinton, Info Center, Elm Brook Park
#1562002	0.30	Hopkinton, Restroom, Elm Brook Park
#1562075	0.30	MacDowell, Storage Building