

Project # 678

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Golden, CO 80401
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CORDILLERAN

April 12, 2001

Mr. Bob Chesson, CPG
Colorado Oil and Gas Conservation Commission
1120 Lincoln; Suite 801
Denver, Colorado 80203

**RE: Summary of Tow Creek Bridge Asbestos Abatement and Bridge Removal
Activities, Milner, Colorado.**

Dear Mr. Chesson:

Cordilleran Compliance Services (Cordilleran) is pleased to provide this report summarizing our oversight of the above referenced project. The subject bridge was located on the Bradley Lease in the northwest $\frac{1}{4}$ of the northeast $\frac{1}{4}$ of Section 18, Township 6 North, Range 86 West of the sixth Principal Meridian. Figure 1 shows the former location of the bridge. Photographs of the bridge during the demolition activities are included in Attachment 1.

The Tow Creek Bridge was a 170-foot long cable structure suspended approximately 12 feet above the Yampa River. The bridge supported two 4-inch diameter steel pipelines across the river. One of the pipelines was wrapped in insulation that contained 18% asbestos.

The Colorado Oil and Gas Conservation Commission (COGCC) retained Sloan Construction (Sloan) of Craig, Colorado to complete the bridge demolition activities. Sloan Construction retained Knight-Armour of Aurora, Colorado to complete the asbestos abatement activities.

The work crews mobilized to the site on Friday March 2, 2001 to perform the asbestos abatement activities. Prior to beginning the abatement work, Sloan construction had cleared the snow from the area around the north bridge abutment to provide a work area and had removed the piping from the product load out facilities located north of the bridge.

Knight-Armour began the abatement work on Friday morning. First they installed a plastic containment shroud under the work areas on the suspension structure. After the plastic was in place, they began the asbestos abatement work. The workers bagged the loose insulation in-place. The sections of pipeline where the insulation was intact were first double-wrapped in plastic glove-bags then cut into small sections and removed from the bridge. After the pipeline was removed from the bridge, the workers vacuumed the planks and plastic shroud to remove the loose insulation. The double wrapped sections of pipe were placed in their truck for transportation to the Denver-Arapahoe Disposal Site. The asbestos abatement work was completed on Saturday morning, March 3, 2001. Copies of the disposal documentation are included in Attachment 2.



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Attachment 2
Asbestos Disposal Documentation

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Photo 18 – View looking south across river after bridge was dragged to north side.



Photo 19 – View of abatement crew loading wrapped timbers and insulation onto service truck

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Photo 16 – View of north abutment as it is dragged from its position by the river.



Photo 17 – View of north abutment area with south abutment structure and pipeline on ground.

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Photo 14 - View of north abutment with bridge lying on ice after south support cables were cut.



Photo 15 - View of north abutment as dozer and skid steer pull cables to drag bridge across river.

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Photo 12 – View of worker cutting notch in supports to south bridge abutment.



Photo 13 – View of south abutment lying on ice after support cables were cut.

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Photo 10 – View of worker cutting pipes and cables connected to south bridge abutment.



Photo 11 – View of worker cutting pipe under planks at south side of bridge.

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Photo 8 – View looking west at the installation of the plastic drape under the bridge.



Photo 9 – View looking northwest at the south bridge abutment.

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Photo 7 – View of installing plastic drape under north end of Tow Creek Bridge looking south.

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Photo 5 – Close up view of opened seam in metal jacket around asbestos insulation



Photo 6 – View looking north at load out piping as it is removed.

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Photo 3 – View looking southeast in March 2001 at the north bridge abutment.



Photo 4 – View looking south in March 2001 across the bridge.

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Photo 1 – View looking north at the product load out pipes in March 2001.



Photo 2 – View looking north at the product load out facility in March 2001.

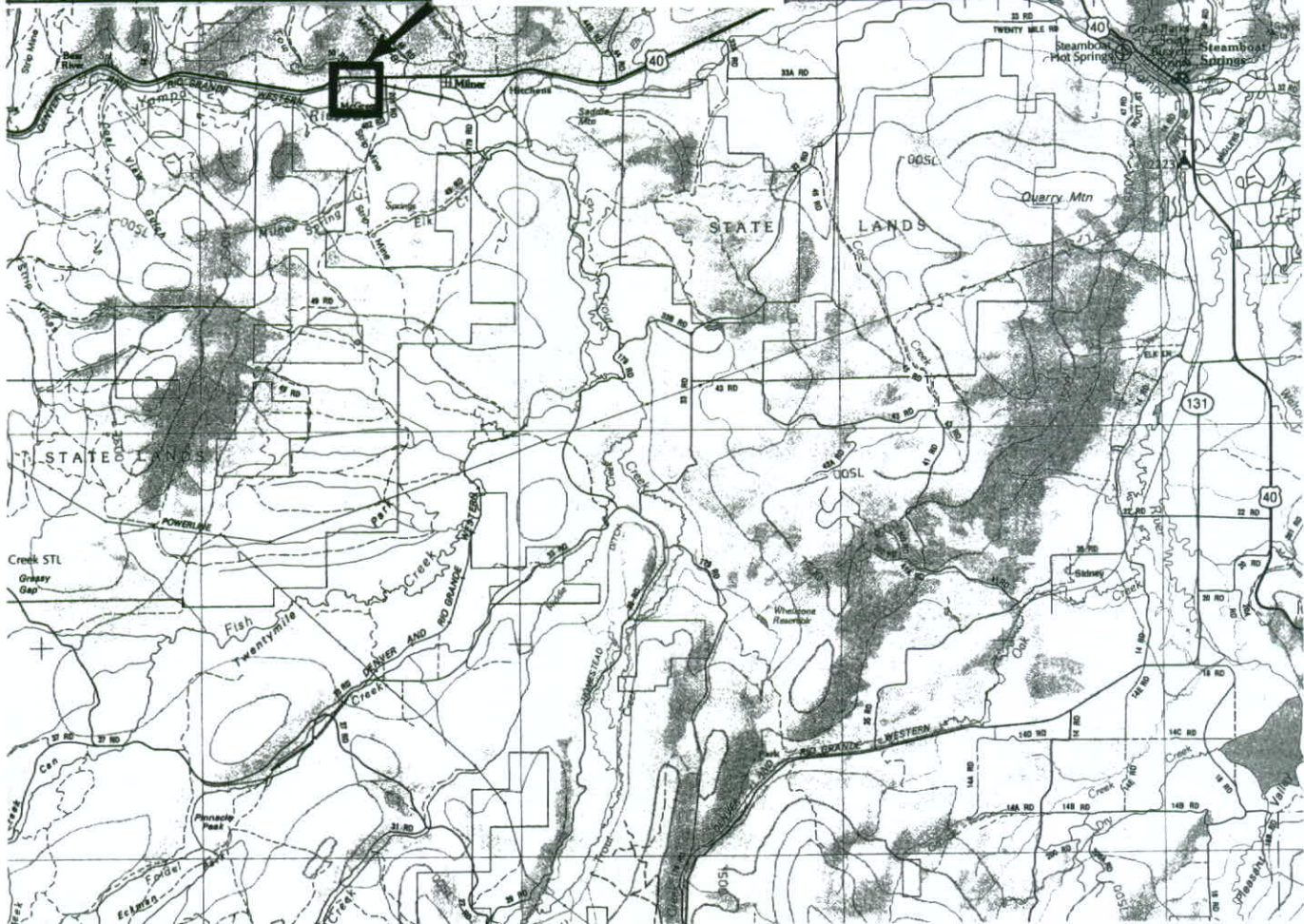
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Attachment 1

Photographic Log



**Cordilleran
Compliance
Services, Inc.**



Figure 1
General Site Location Map
Tow Creek Bridge Removal
Milner, Colorado

Prepared For:
**Colorado Oil and Gas
Conservation Commission**

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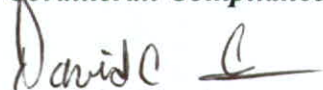
After the asbestos containing insulation was removed from the bridge, Sloan began preparing the bridge for demolition. The non-structural pipelines and cables were detached from the abutments and the steel supports to the abutments were notched at the base so they would fall towards the north when the suspension cables were cut at the south abutment. Sloan then cut the suspension cables from the dead-men on the south side of the river and the south bridge abutment fell towards the north lowering the bridge onto the ice. Once the bridge was lowered to the ice, the wooden planks were removed, double-wrapped in plastic and placed in the truck with the pipeline sections.

Sloan then used the suspension cables on the north side of the bridge to drag the bridge across the river to the staging area around the north bridge abutment. After the bridge was dragged to the north side of the river the pipeline, cables and steel abutment frames were cut up, placed in a roll-off container and the site was cleaned up. The metal and debris that was not impacted by asbestos was taken to the Milner landfill for disposal. The work was completed during the week of March 5, 2001.

Cordilleran appreciates the opportunity to assist the COGCC with this project. We look forward to working with you again in the future. If you have any questions, please call us at (303) 237-2072.

Sincerely,

Cordilleran Compliance Services, Inc.



David C. Cloutier

Senior Project Manager

ASBESTOS COMPLIANCE MANIFEST

32 5758D

PART 1

GENERATOR

A generator must sign and keep a copy of each manifest signed in accordance with CFR 40 262.23 (a-1) **retain a handsigned copy** from the designated facility which received the waste. In accordance with CFR 40 262.40, this must remain on file for three years. Only Handsigned copies are legal documents for generators.

PROJECT NAME: TWO CREEK BRIDGE GENERATOR NAME: CO OIL & GAS CONVERSION

ADDRESS: ST HWY 40 / TWO CREEK BRIDGE ADDRESS: ST HWY 40

CITY/STATE/ZIP: MILNER, CO CITY/STATE/ZIP: MILNER, CO

Name of Authorized Agent

Signature

Receipt Date

PART 2

CONTRACTOR

NAME OF CONTRACTOR: KNIGHT ARMOUR, INC

ADDRESS: 1616 17TH ST #264

CITY/STATE/ZIP: DENVER, CO 80202 PHONE: (303) 628-5535

RESPONSIBLE AGENCY:

Air Pollution Control Division
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, CO 80222 • (303) 692-3100

RQ Asbestos
Class 9
NA 2212
PG III

Weight	_____
Bags	<u>22</u>
<u>MOVS</u>	<u>27</u>
Cubic feet/ Cubic yds.	_____

Transportation Regulations for asbestos are as follows: 171.2, 172.101, 172.602, 173.216.

EPA Regulations are: CFR 40-260-261, 262.22 (60 Part III), 61.142-157.55,

☒ FRIABLE

☐ NON-FRIABLE

I hereby certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified, marked and labeled and packaged, and is in proper condition for transportation according to applicable regulations of the D.O.T.

Special Handling Instruction (if any): Wetted / 150F

Name of Authorized Agent

Signature

Receipt Date

PART 3

TRANSPORTER

A transporter must keep a copy of each manifest signed in accordance with CFR 40 262.23 (b-2), **Obtain the handwritten signature** of the initial transporter and date of acceptance on the manifest. This must remain on file for three years. Emergency contact: Wayne Gums, (303) 433-0641

In case of accident or spill, inspect bag for holes damage. Keep all material wet until clean-up crew responds.

TRANSPORTER #1: _____ Phone No.: _____

Address: _____

Name of Authorized Agent

Signature

Receipt Date

TRANSPORTER #2: _____ Phone No.: _____

Address: _____

Name of Authorized Agent

Signature

Receipt Date

PART 4

DESTINATION

In accordance with CFR 40 S 262.40, a designated facility must **retain a handsigned copy** of the manifest on file for three years.

SITE NAME: DENVER ARAPAHOE DISPOSAL SITE

MAILING ADDRESS: 2400 West Union, Englewood, CO 80112

PHYSICAL ADDRESS: 3500 S. Gun Club Road, Aurora, CO 80013

PHONE NO.: (303) 797-4685 • Emergency Contact • Tom Buchholz

RESPONSIBLE AGENCY:

Air Pollution Control Division
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, CO 80222
(303) 692-3100

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

Name of Authorized Agent

Signature

Receipt Date

Discrepancy Indication _____

CO-CO 1 WHITE: Generator GREEN: Final Transporter YELLOW: Contractor PINK: Landfill GOLD: Transporter 1