

- **Internal Audit Report for December 2005**

Summary

One Special Review Report was issued:

- Investigation of Possible Asbestos Exposure from Head Gate Gasket Removal During CRA Switchyards and Head Gates Rehabilitation Project Special Review Report
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Investigation of Possible Asbestos Exposure from Head Gate Gasket Removal During CRA Switchyards and Head Gates Rehabilitation Project Special Review Report

Project Description

Based upon a request from Metropolitan Management, The Cohen Group (Group) was commissioned to conduct an investigation into the circumstances surrounding rehabilitation work at five Colorado River Aqueduct pumping plants during which asbestos exposures were alleged to have occurred as a result of improper handling of gasket material associated with the disassembly of the head gate structures at two or more of the water lift stations. During the investigation, the Group reviewed documents and digital photographs provided by Metropolitan staff; conducted interviews of selected employees involved in the head gate rehabilitation project at Union Station and Gene Camp; and performed site inspections of the head gate houses at Intake, Gene, and Iron Mountain. The Internal Audit Department administered this contract and served as the Group's liaison to Metropolitan throughout the investigation. In addition, a representative from the General Counsel's Office and from AFSCME Local 1902 assisted in this review.

Comments and Recommendations

Comments were noted in the areas of "flagging" head gate gaskets as asbestos-containing material; maintaining a complete asbestos database; and improving oversight during an environmental clean-up process. In addition, the Group was not able to estimate the exposure level of any Metropolitan employee or contractor personnel to airborne asbestos fibers during removal of the head gate and gasket at the Gene and Iron Mountain head gate houses. However, the Group concluded that a recent study of dry removal of asbestos-containing gaskets demonstrated that the exposures would not approach the Cal/OSHA Permissible Exposure Limit.

The Group presented various recommendations to senior management. Specifically, these included recommendations that Water System Operations (WSO) management improve the project specifications review process to include more consistent reviews for health and safety issues; that asbestos awareness training be provided to inspectors and pump mechanics; and that communications between Workplace Health and Safety staff and WSO personnel be improved at

the desert pumping stations. In addition, recommendations were made to assemble a team comprised of both Workplace Health and Safety (WHS) and WSO managers to meet with desert facilities personnel to address all aspects of this incident; to improve pre-work meetings with contractors to include a thorough discussion of safety issues and potential health and safety hazards to be encountered during the work activities; and to update the "3713 Asbestos database". Finally, the Group recommended that Metropolitan's internal procedures be revised to clearly state that all gaskets encountered in equipment at MWD facilities must be presumed to contain asbestos until tested and determined to be otherwise through sample analysis or via direct verification of the gasket's original date of installation and composition.