Asbestos Abatement Work Plan

Tonawanda Coke Site 108
3800 River Road
Tonawanda, New York

CHA Project Number: 35547

Prepared for:
Parsons
301 Plainfield Road
Syracuse, New York 13212

Prepared by:

III Winners Circle
Albany, New York 12205
Phone: (518) 453-4500

February 24, 2020

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QUALIFICATIONS AND CERTIFICATION STATEMENT

This Asbestos Abatement Work Plan was compiled by a qualified environmental scientist employed by CHA.

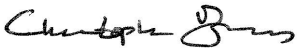
This plan has been prepared expressly for the use of Parsons and Honeywell. No other parties are entitled to rely upon this report unless our express written consent is first obtained. All conclusions drawn were based on CHA's review of available historical data, field inspection and analytical results from sampling performed during the course of this project. Recommendations are submitted based on CHA's knowledge, experience, and professional judgment.

This work plan is intended to satisfy the USEPA with respect to abatement of specific areas of ACM on the site.

Report Completed By:

James Morey
Senior Scientist V

Report Reviewed By:



Christopher Burns, Ph.D., P.G.
Vice President

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LIST OF ACRONYMS & ABBREVIATIONS

ACM	Asbestos-Containing Material
PACM	Presumed Asbestos-Containing Material
PPE	Personal Protective Equipment
ELAP	Environmental Laboratory Approval Program
ICR	Industrial Code Rule
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NYSDOL	New York State Department of Labor
USEPA	United States Environmental Protection Agency
OSHA	Occupational Safety and Health Administration

1.0 INTRODUCTION

CHA was retained by Parsons to develop this asbestos abatement work plan relative to asbestos containing materials (ACM) identified at the Tonawanda Coke Site 108 located at 3800 River Road, Tonawanda, New York. This work plan is focused on ACM that warrants abatement at this time (pipe insulation and related insulation debris). Additional asbestos abatement will be required prior to, or as part of, future demolition (e.g., presumed asbestos-containing pipe gasket material or nonfriable asbestos-containing roof material are excluded from the scope of this work plan).

2.0 BACKGROUND

CHA performed a pre-demolition asbestos-containing material survey of portions of Site 108 at Tonawanda Coke on October 23, 2019. The survey included the sections of pipeline shown on Figure 1 attached to this report, terminating where the pipeline enters the brick structure/tunnel where it travels beneath River Road. In addition to the pipeline itself, CHA also inspected the pumphouse roof. The pumphouse (excluding the roof level) and associated adjacent piping were previously inspected by Parsons and the following materials were found to be asbestos-containing: window glazing compound, gray door caulk, gray window caulk, pipe insulation, mudded fitting insulation, and asbestos insulation debris. The complete findings are detailed in CHA's Pre-Demolition Asbestos-Containing Material Survey Report, dated January 20, 2020.

CHA identified 5 suspect ACMs associated with the pipeline and pumphouse roof during the current survey fieldwork and a total of 61 individual bulk samples were collected. All 5 suspect ACMs were confirmed to be ACMs as identified through the following approved laboratory methods under New York State's Environmental Laboratory Approval Program (ELAP): ELAP 198.1 for friable samples, ELAP 198.6 with gravimetric reduction for nonfriable organically bound (NOB) samples, and transmission electron microscopy for those NOB samples that were found to be inconclusive under the 198.6 method. In summary, the following materials were found to be asbestos-containing: pipe and fitting insulation, black sealant on pipe insulation, insulation debris, various roof sealants on the pumphouse roof, and window and door caulk. No asbestos was detected in the pumphouse roofing material or the brick structure mortar. Several materials were not tested for asbestos because of access or safety concerns, but were presumed to be ACM. These PACMs include pipe gaskets and wire covers within the pumphouse. The asbestos debris is located on the soil ground surface beneath

the pipeline and adjacent to the pumphouse. See Figure 1 for the scope area, location of confirmed ACMs and asbestos debris which are the scope of the asbestos abatement project.

The asbestos pipe insulation, black sealant on pipe insulation, and pipe insulation debris are the only ACMs included in the scope of this work plan. All other identified or presumed ACM's are out of scope and will be removed during a separate project.

3.0 PROJECT PHASING

The asbestos abatement project will be phased in the following five sequential steps:

1. Asbestos debris cleanup of the ground surface beneath the pipeline and adjacent to the pumphouse.

2. Asbestos pipe and fitting insulation removals along the pipeline itself, the section of pipeline branching off toward the pumphouse, within the pumphouse, terminating at the tunnel entrance on the east end of the pipeline.

3. Wet lag cloth (eg. Fiberlock Lag Kloth®) will be applied to all pipe insulation edges to remain.

4. Installation of lockable wood sheathing which will isolate the pipeline within the tunnel that extends beneath River Road.

5. Removal of all interior and exterior pipe insulation and insulation debris located at the pumphouse. The remaining intact non-friable ACM and PACM removals shall be completed in coordination with future building demolition (not included in this project scope). These materials include the window glazing compound, gray door caulk, gray window caulk, pipe gaskets, and wire coverings.

4.0 GENERAL ASBESTOS PROJECT PROCEDURES

1. The NYS-licensed asbestos abatement contractor shall perform all work in accordance with all federal, state, and local laws and regulations.

2. A full-time NYS-certified Project Monitor will be on site for the duration of all asbestos abatement activities. The Project Monitor will conduct daily work area inspections, perform air monitoring per ICR 56-4 – General Project Air Sampling and Laboratory Analysis Requirements.

3. All persons entering the regulated asbestos abatement work area(s) shall don the proper personal protective equipment (PPE) per ICR 56-7.5 and OSHA 1926.1101 including respiratory protection, full body suits (e.g. Tyvek®) and utilize the personal decontamination system which shall be on site for the duration of the project.

4. The contractor shall use proper fall protection per OSHA 1926 Subart M for all asbestos removals at heights greater than six feet.

5. The quantities of asbestos are in excess of 160 square feet and as such, this asbestos abatement project will require formal notifications to the NYSDOL's Asbestos Control Bureau as a requirement with ICR 56 and to the United States Environmental Protection Agency (USEPA) as required under NYS ICR 56 and USEPA's National Emission Standards for Hazardous Air Pollutants (NESHAPS) regulation. These notifications will be submitted by the abatement contractor prior to mobilization to the site.

6. The contractor shall supply all electrical power and water necessary to perform their work.

7. All decontamination unit water used by the contractor shall be passed through a 5 micron in-line filter, containerized and discharged off-site in a sanitary sewer system in accordance with all applicable codes and regulations.

8. It is assumed that there will be no confined space entries necessary to complete the asbestos removals included within this work plan.

5.0 ASBESTOS ABATEMENT PROCEDURES

5.1 ASBESTOS DEBRIS

The quantity of friable asbestos pipe insulation debris located beneath the pipeline and adjacent to the pumphouse is greater than 10 square feet and thus requires an approved site-specific variance be granted from NYS Department of Labor to allow for the debris cleanup with modified work methods that may deviate from Industrial Code Rule (ICR) 56. It is anticipated that the asbestos debris cleanup will be completed in accordance with an approved site-specific variance and in general accordance with ICR 56 11.2 (f) which outlines the corrective actions for incidental disturbance of asbestos. The removals will include all pipe insulation debris as well as all impacted soils located directly beneath and adjacent to the visible debris. The quantity of visible asbestos debris and surficial soils in contact with the asbestos debris is approximately 5,100 SF.

The asbestos debris cleanup work area will be cordoned off with barrier tape and appropriate signage at a minimum distance of 25' from the outmost limit of the asbestos debris cleanup, the contractor will utilize a remote project decontamination unit, and install critical barriers on any building openings within 25' of the active abatement work area. The contractor shall employ wet methods while performing the asbestos insulation debris and soil cleanup. All removed materials shall be appropriately containerized and transported to a hard-topped dumpster lined with two independent layers of 6-mil poly sheeting per ICR 56.

5.2 INTACT ASBESTOS PIPE INSULATION

The intact pipe insulation along the pipeline and associated with the pumphouse building will be removed and handled per ICR 56, Subpart 8.4 (a) Glovebag Procedures, Subpart 8.4 (e) Handling, or Subpart 11.8 Abandoned Pipe/Duct/Conduit Wrap and Cut Removal methods. A site-specific variance will be sought to allow for asbestos removals to occur within a glovebag without the construction of a negative pressure tent containment. All removed materials shall be appropriately containerized and transported to a hard-topped dumpster lined with two independent layers of 6-mil poly sheeting per ICR 56. Upon completion of gross removal, the perpendicular pipe insulation edges to remain shall be sealed with wet lag cloth (eg. Fiberlock Lag Kloth®) to stabilize the pipe insulation and prevent further incidental disturbances in the future. The estimated quantity of pipe insulation to be removed is approximately 5,000 LF, including piping on the pipe rack system and pipe inside and outside of the pumphouse.

Upon completion of the pipe insulation removals, the application of wet lag to the pipe ends, and acceptance of passing clearance criteria per ICR 56 Subpart 56-9, the contractor shall install lockable wood sheathing to the pipe tunnel entrance at River Road. The wood barrier shall be constructed of minimum 5/8" exterior 1-rated OSB and finished with an exterior grade paint.

5.3 OTHER ACM / PACM

The following intact non-friable ACM and PACM are excluded from this scope of work and will be addressed as part of future demolition: wire coverings, window/door caulk, window glazing compound, roof tar, and pipe gaskets.

6.0 ABATEMENT DESIGN, SCHEDULE, AND PROCUREMENT

6.1 ABATEMENT DESIGN

Following approval of the work plan, a petition for a site-specific variance will be prepared and submitted to NYSDOL outlining alternative work practices for the asbestos removal and debris clean-up. Asbestos abatement design drawings and specifications based on requirements of the approved variance will be included in a bid package to contractors.

6.2 ABATEMENT PROJECT SCHEDULE

Appendix A includes a schedule outlining the primary steps of the abatement design, procurement and construction process. A final abatement schedule will be developed based on the variance requirements and input from the abatement contractor once selected.

6.3 CONTRACTOR PROCUREMENT

The abatement contractor procurement process will include bidding of work to multiple pre-qualified contractors. Bid submittal documentation will include:

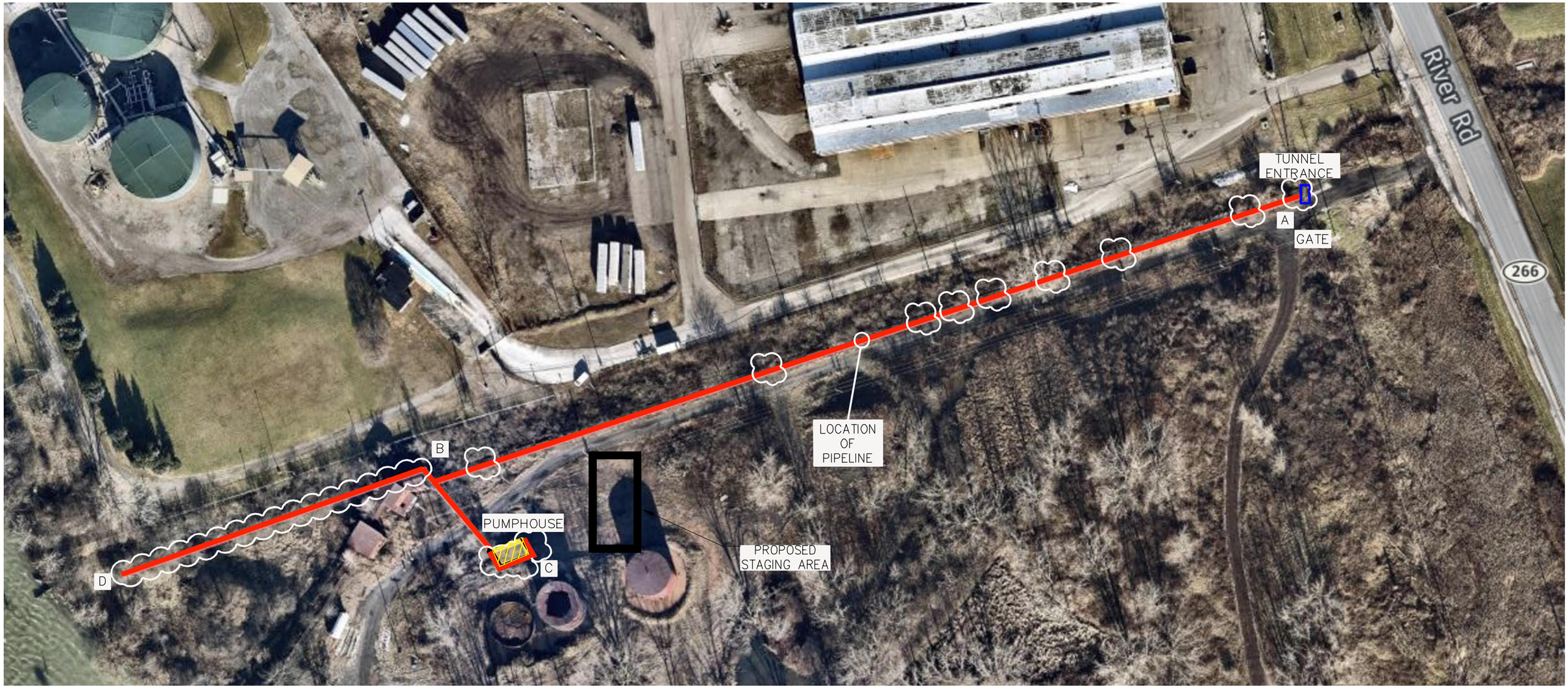
1. Project schedule;
2. Technical approach;
3. Contractor license, resume and references;
4. Disposal facility;
5. Listing of citations, violations, and/or stop work orders issued by any regulatory agencies.

Bid submittal information will be reviewed with the USEPA as necessary prior to contractor selection. Once a contractor has been selected, pre-work submittals will be requested as follows:

1. Workplan, schedule and health and safety plan.
2. Copies of federal, state, and local permits and notifications,
3. Copies of state and local licenses necessary to carry out the work.

The pre-work submittal information will be reviewed with the USEPA prior to mobilization and start of work.

FIGURE 1
SITE LOCATION PLAN



LEGEND

- APPROXIMATE LOCATION OF ASBESTOS–CONTAINING DEBRIS ON GROUND (PHASE 1 OF ABATEMENT SCOPE)
- LOCATION OF ACM INSULATION COVERED PIPING (PHASE 2 OF ABATEMENT SCOPE)
- ENTRANCE TO TUNNEL EXTENDING BENEATH RIVER ROAD (PHASE 3 AND 4 OF ABATEMENT SCOPE)
- LOCATION OF PUMPHOUSE (PHASE 5 OF ABATEMENT SCOPE)

DRAWING IS NOT TO SCALE

CHA
111 Winners Circle, PO Box 5269
Albany, NY 12205-0269
518.453.4500 · www.chacompanies.com

SITE LOCATION PLAN
TONAWANDA COKE SITE
3800 RIVER ROAD
TONAWANDA, NEW YORK 14151

PROJECT NO. 35547

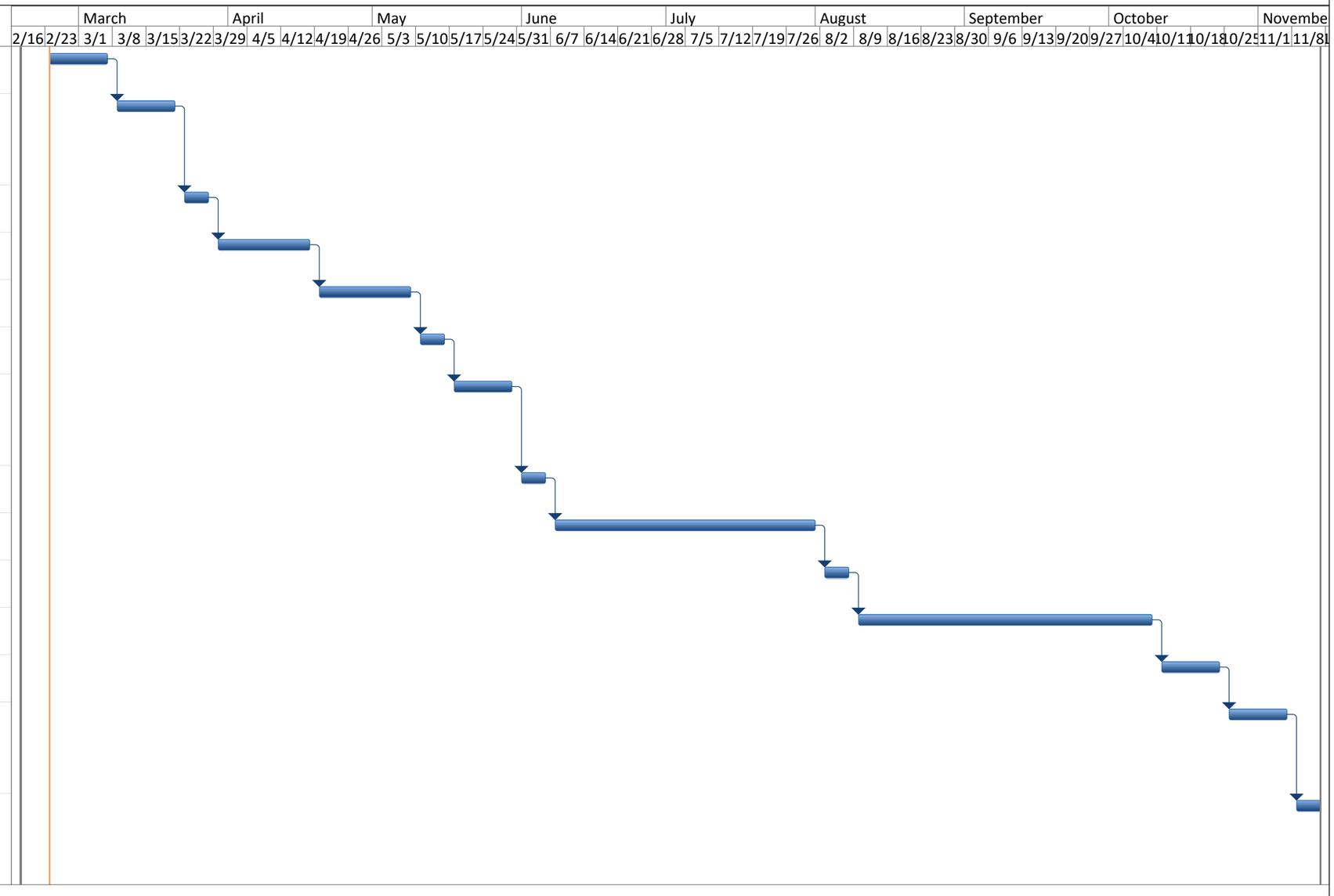
DATE: 02/13/20

FIGURE 1

APPENDIX A
DRAFT ABATEMENT PROJECT SCHEDULE

TCC SITE 108 ASBESTOS ABATEMENT SCHEDULE

ID	Task Name	Duration	Start	Finish
1	EPA Work Plan Review	10 days	Mon 2/24/20	Fri 3/6/20
2	Work Plan Revisions/Submittal to EPA	10 days	Mon 3/9/20	Fri 3/20/20
3	EPA Work Plan Approval	5 days	Mon 3/23/20	Fri 3/27/20
4	Variance and Bid Package	15 days	Mon 3/30/20	Fri 4/17/20
5	Procurement Bid	15 days	Mon 4/20/20	Fri 5/8/20
6	Procurement - Selection	5 days	Mon 5/11/20	Fri 5/15/20
7	Prework Submittals/Notification	10 days	Mon 5/18/20	Fri 5/29/20
8	Mobilization	5 days	Mon 6/1/20	Fri 6/5/20
9	Asbestos Abatement	40 days	Mon 6/8/20	Fri 7/31/20
10	Demobilization	5 days	Mon 8/3/20	Fri 8/7/20
11	Closure Report Prep	45 days	Mon 8/10/20	Fri 10/9/20
12	EPA Closure Report Review	10 days	Mon 10/12/20	Fri 10/23/20
13	Closure Report Revisions/Submittal to EPA	10 days	Mon 10/26/20	Fri 11/6/20
14	EPA Closure Report Approval	5 days	Mon 11/9/20	Fri 11/13/20



Project: Site 108 Asbestos Abatem
Date: Mon 2/24/20

Task	Project Summary	Inactive Milestone	Manual Summary Rollup	Deadline
Split	External Tasks	Inactive Summary	Manual Summary	Progress
Milestone	External Milestone	Manual Task	Start-only	
Summary	Inactive Task	Duration-only	Finish-only	

APPENDIX B
PERSONNEL AND FIRM LICENSES

New York State – Department of Labor
Division of Safety and Health
License and Certificate Unit
State Campus, Building 12
Albany, NY 12240

ASBESTOS HANDLING LICENSE

CHA Consulting, Inc.

III Winners Circle

Albany, NY 12205

FILE NUMBER: 11-60318
LICENSE NUMBER: 60318
LICENSE CLASS: RESTRICTED
DATE OF ISSUE: 10/03/2019
EXPIRATION DATE: 10/31/2020

Duly Authorized Representative – Seth Fowler:

This license has been issued in accordance with applicable provisions of Article 30 of the Labor Law of New York State and of the New York State Codes, Rules and Regulations (12 NYCRR Part 56). It is subject to suspension or revocation for a (1) serious violation of state, federal or local laws with regard to the conduct of an asbestos project, or (2) demonstrated lack of responsibility in the conduct of any job involving asbestos or asbestos material.

This license is valid only for the contractor named above and this license or a photocopy must be prominently displayed at the asbestos project worksite. This license verifies that all persons employed by the licensee on an asbestos project in New York State have been issued an Asbestos Certificate, appropriate for the type of work they perform, by the New York State Department of Labor.

Eileen M. Franko, Director
For the Commissioner of Labor

SH 432 (8/12)

STATE OF NEW YORK - DEPARTMENT OF LABOR
ASBESTOS CERTIFICATE

N.Y.S

JAMES N MOREY
CLASS(EXPIRES)
D INSP(08/20) I PD (08/20)

CERT# 00-11983
DMV# 589756376

MUST BE CARRIED ON ASBESTOS PROJECTS

01213 005237364 43

EYES HAZ
HAIR BRO
HGT 6' 00"

IF FOUND RETURN TO:
NYSDOL - L&C UNIT
ROOM 161A BUILDING 12
STATE OFFICE CAMPUS
ALBANY NY 12240