Abatement of Asbestos Containing Thermal Systems Insulation & Incidental Disturbance Decontamination Buildings G & H

Lawrence Aviation Industries

100 Sheep Pasture Road, Port Jefferson Station, NY 11777

Project Monitoring Report February 27th, 2015



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Asbestos-Containing Thermal Systems Insulation Abatement & Incidental Disturbance Decontamination Buildings G & H

At

Lawrence Aviation Industries 100 Sheep Pasture Road, Port Jefferson Station, NY 11777

December 11th, 2014- February 2nd, 2015

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1.0 Executive Summary

Insight Environmental, Inc. was retained by Environmental Restoration, LLC to provide project monitoring services in support of the abatement of asbestos containing Thermal System Insulation materials and decontamination of Asbestos debris throughout the interior of Buildings G & H at Lawrence Aviation Industries, situated at 100 Sheep Pasture Road, Port Jefferson Station, New York 11777.

These abatement actions were conducted in response to incidental disturbance of Asbestos Containing Materials during scrap metal reclamation activities on the part of the site's Owner. Our office conducted a contamination assessment and bulk sampling throughout affected areas so that a work plan could be developed to address these issues. Our office then prepared a site specific variance that was approved by the New York State Department of Labor(NYSDOL) Engineering Services Unit under Case Number 14-1408. A copy of the approved variance decision is attached herewith as Appendix A of this report.

The abatement project involved the removal of approximately 150 linear feet of in-place asbestos containing pipe insulation, 30 in-place pipe fittings and decontamination of approximately 12,840 sq. ft. of the interior of Building's G & H. Of these 30 fittings, some were in–place while the remainder were debris observed on the floor, in the drop hammer pit and in proximity to the boiler. Said abatement and decontamination activities occurred between December 11th, 2014 and February 2nd, 2015, and was completed by Action Remediation, Inc. in accordance with all applicable local, State and Federal regulations.

All final Phase Contrast Microscopy (PCM) samples collected and analyzed via NIOSH 7400 method conform to clean air requirements as established by NYS Industrial Code Rule 56, section 56-4.11 which states, in part,"...The clearance air monitoring results shall be considered satisfactory when every sample demonstrates an airborne concentration of asbestos fibers of less than 0.01 fibers per cubic centimeter, or the background level, whichever is greater."

Enclosed with this report, please find Approved Site Specific Variance Case No. 14-1480, PCM/TEM Air Sample Results, Project Logs, Sample Location Diagrams, Bulk Sample Analysis Results for Unexcavated Trench, Diagram depicting Inaccessible Areas for Decontamination, Insight's firm and personnel Certifications, Action Remediation, Inc.'s firm and personnel Certifications and all Waste Manifests generated as a result of the work.

2.0 Asbestos Air Monitoring and Analysis

Insight Environmental, Inc. provided NYSDOL certified personnel experienced in the on-site monitoring of asbestos projects. Insight Environmental personnel remained on site during the

project to perform air monitoring, to oversee the asbestos abatement, and to ensure that the project was completed safely.

Action Remediation, Inc. performed personnel air monitoring consistent with Occupational Safety and Health Administration (OSHA) requirements promulgated under 29 CFR 1926.1101.

Air sampling was conducted by Insight Environmental, Inc. both within the regulated area, at waste decontamination activities, at personnel decontamination facilities, at critical barriers to neighboring buildings "F" and "G2" (Chem. Mill), at negative air exhaust locations and outdoors in areas remote from the building(s) during all abatement activities. Please refer to page #29 of Attachment #1 of our November 11th, 2014 Petition for Variance that is included in Appendix A of this report for further detail on building designations.

Interior exceedances over 0.01 fibers per cubic centimeter (f/cc) were initially remanded for confirmation via Transmission Electron Microscopy (TEM) analysis following NIOSH 7402 methodology. Exterior exceedances over 0.01 f/cc were remanded for confirmation via Transmission Electron Microscopy (TEM) analysis following NIOSH 7402 methodology. Results of these conformational analyses were either non-detect for Asbestos or were overloaded and concentrations could not be calculated. The New York State Department of Labor Asbestos Control Bureau was notified by Insight Environmental, Inc. of exceedances of 0.01 f/cc; either in the form of overloads or non TEM confirmed PCM samples on December 29th, 2014, January 7th, 2015, and January 19th, 2015.

Following the satisfactory final visual inspection, as approved by Mr. John Paciulli, aggressive air sampling was conducted throughout building's G & H. This process cumulatively involved 90 minutes of agitation using 1 HP leaf blowers and a total of 45 (forty five) 20" box fans.

All final PCM air samples collected were within clean air requirements as established by NYS Industrial Code Rule 56, section 56-4.11 which states, in part "...The clearance air monitoring results shall be considered satisfactory when every sample demonstrates an airborne concentration of asbestos fibers of less than 0.01 fibers per cubic centimeter or the background level, which ever is greater."

Sample analyses were performed by AmeriSci Richmond (ELAP #10984), a NYS Environmental Laboratory Approval Program accredited and proficient Asbestos analysis laboratory. All results are attached herewith in Appendix B of this report.

3.0 Visual Inspections

Visual Inspections were conducted daily and during project milestones, including establishment of the regulated area, pre-abatement preparations, during abatement work procedures/progress and

post abatement activities. The details of these inspections are memorialized in Appendix C of this report; "Project Logs".

Visual inspections were also performed by the NYSDOL Asbestos Control Bureau on December 16th, 2014 and again on January 13th, 2015. In both instances Ms. Barbara Eisenberg conducted the enforcement inspections. No comments or violations were issued on either occasion, although Ms. Eisenberg of NYSDOL did instruct that the negative air equipment should be exhausted to outside the work area, rather than continuously filter indoor ambient air as stipulated in the approved site specific variance.

The final visual inspection was conducted and approved on Thursday, January 29th, 2014 by Mr. John Paciulli. Certain areas were deemed inaccessible due to restricted/limited access, sharp object hazards, and crushing hazards. These areas include the interior of the large oven, behind welding benches in the "Forge" area of building "G", behind the hood of cutting apparatus in Building "H" and the un-excavated trench in Building "G". These areas were isolated from the regulated area by installation of critical barriers over/around these items.

It is noted that all loose debris that could be safely removed from the interior of the oven was, in fact, removed.

It is noted that the un-excavated trench was sampled by the EPA and found not to contain Asbestos. Said trench was isolated from the work area by installation of 6 mil. fire retardant polyethylene sheeting and subsequently by ¾" plywood sheathing. Results of these analyses are attached herewith as Appendix E of this report.

4.0 Conclusion

All asbestos containing pipe wrap, fittings and ACM debris has been effectively removed from all reasonably accessible areas of Building's "G" & "H". Action Remediation, Inc. successfully removed the specified asbestos-containing materials, then cleaned the work area of all residual Asbestos containing debris within the regulated area and containerized the asbestos waste. Environmental Restoration, LLC disposed of Asbestos waste generated from the site. Copies of waste manifests are included as Appendix I of this report.

All final clearance asbestos air samples analyzed by PCM pass the clean air criteria levels and as such, the abatement project is considered complete.

It is important to note that those areas that were inaccessible during the scope of work could not be decontaminated and as such the Owner must be advised of these locations in the event that future salvage operations will disturb these locations. For your convenience a Diagram of Inaccessible Areas for Decontamination is attached herewith as Appendix F of this report.