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October 31, 2014

Mr. Modesto Candelario
Buffalo Municipal Housing Authority
Assistant Executive Director
300 Perry Street
Buffalo, New York 14204

**Re: Kensington Heights Complex
Asbestos Abatement Project
EPA Compliance Summary Report**

Dear Mr. Candelario:

Enclosed please find the EPA Compliance Summary Report for the above listed project. A copy of this report should be kept with other abatement projects documentation for a minimum of 30 years.

Should you have any questions or concerns regarding this report, please do not hesitate to call me. Thank you for the opportunity to be of service to BMHA.

Sincerely,
Stohl Environmental, LLC

Christopher C. Stohl

enc.

EPA Compliance Summary Report

for

Asbestos Abatement

Located At

**Kensington Heights Complex
1827 N. Fillmore Avenue
Buffalo, NY**

Prepared by



ENVIRONMENTAL CONSULTANTS - A MEMBER OF THE STOHL GROUP OF COMPANIES

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1. Introduction

On or about September 6, 2011 the Buffalo Municipal Housing Authority (BMHA) received compliance order CAA-02-2011-1021 from the US Environmental Protection Agency (EPA) with regard to the site known as Kensington Heights. The EPA Compliance Order required the BMHA to submit a work plan and address various issues on the site.

This report details the actions taken in response to the EPA's Compliance Order Number CAA-02-2011-1021 over the course of the project. Part of the EPA Compliance Order were six individual Orders that addressed various conditions on the site. Two of the Orders were for instructional purposes only. A summary of all six orders is located in Section 2 of this report.

Orders one and six were instructional and informative orders that were complied with throughout the course of this project. Response actions for Orders one and six are not included as part of this report for this reason.



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2. EPA Compliance Orders 1 Through 6

Order I:

The provisions of this Order shall apply to Respondent and its officers, agents, servants, employees, successors and to all persons, firms and corporations acting under, through or for Respondent

Order II:

Respondent shall perform all renovation/demolition operations at the Kensington Heights Towers and any and all other facilities in which Friable asbestos is present in compliance with all applicable provisions of the Asbestos NESHAP.

Order III:

Respondent shall immediately adequately wet and cover with polyethylene sheeting the two roll-off containers and associated spillage, and shall ensure that the containers and associated spillage remain adequately wet and covered until the RACM is properly collected for disposal. Respondent shall notify EPA that it has wet and covered the roll-off containers and associated spillage within 24 hours of completion.

Order IV:

Respondent shall immediately cover all windows and openings in buildings 1 through 6 at Kensington Heights Towers. Respondent shall notify EPA that it has covered all windows and openings in buildings 1 through 6 at Kensington Heights Towers within 24 hours of completion.

Order V:

Upon the effective date of this Order (which is specified below in the section entitled "Effective Date and Opportunity for a Conference") Respondent shall submit a comprehensive asbestos abatement plan for the entire site for EPA's approval. This plan shall be prepared by an AHERA accredited project designer. The plan shall include identification and delineation of the extent of asbestos soil contamination outside of buildings 1 through 6, and shall also include plans for taking a soil lift of adequate depth of these areas. The plan shall also include plans for daily perimeter air monitoring at the fence line during abatement. In addition, a site diagram with the expected sampling locations shall be submitted along with the abatement plan for EPA approval.

Order VI:

The notifications required by Paragraphs III and IV above, as well as the asbestos abatement plan and site diagram required by Paragraph V above, shall be sent via overnight service to:

Mr. Ken Eng, Chief
Air Compliance Branch
Division of Enforcement and Compliance Assistance
290 Broadway, 21st Floor
New York, NY 10007

3. Response Actions to EPA Compliance Orders 2 Through 5

Summary of actions taken in response to Order II:

Abatement and cleaning of the tarmac/soils was broken into 2 phases of work. Aria contracting completed phase 1 of work on September 28, 2012 and completed phase 2 of the work on November 2, 2013. Areas of contaminated tarmac and soil were wetted with amended water and vegetation was cut to access soil areas. All asbestos debris was removed from tarmac and soil areas and immediately bagged for disposal.

All building openings were sealed with 2 layers of polyethylene sheeting and decontamination systems were attached to the buildings. All asbestos containing debris and general debris located within the buildings was abated and disposed of as RACM. Upon completion of interior abatement and as required by the Site Specific Varaince for each building, a NYS DOL inspector conducted the final visual inspection prior to clearance air sampling. Completion dates by building and activity are shown in the table below:

Activity	Date Final Clearance Air Samples Achieved
Abatement/cleaning of the interior of Building A1	September 12, 2012
Abatement/cleaning of the interior of Building B2	October 16, 2012
Abatement/cleaning of the interior of Building A3	February 6, 2014
Abatement/cleaning of the interior of Building B4	October 29, 2014
Abatement/cleaning of the interior of Building A5	September 9, 2013
Abatement/cleaning of the interior of Building B6	June 28, 2013

3. Response Actions to EPA Compliance Orders 2 Through 5 Continued

Summary of actions taken in response to Order III:

Clean-up operations around the dumpsters and sealing the dumpsters was completed by Arric Corporation on October 21, 2011. Arric wetted all asbestos inside the regulated work area and covered the dumpsters with 2X4 framing, plywood sheathing and two layers of six mil. plastic sheeting. The plastic sheeting was sealed airtight to the dumpsters with spray glue and waterproof tape. Holes in the dumpsters were sealed with plastic, spray glue and waterproof tape. Cleaning of the defined perimeter soil and tarmac took place using amended water, shovels and scrapers. Upon completion of the bulk removal of floor tile debris, HEPA vacuums were used to remove fine particles. Waste generated during the cleaning operation was containerized and properly labeled in compliance with the requirements of the NESHAP regulation.

Sealed dumpsters were left on site and continually checked by Stohl Environmental personnel until they were cleaned out and disposed of by Aria Contracting on August 28, 2012. Dumpsters were cleaned according to the approved EPA work plan. A negative pressure regulated abatement work area was constructed around the dumpsters. All waste was wetted with amended water and bagged for disposal. After all removals were complete the dumpsters and ground were wet wiped and HEPA vacuumed. Waste generated during the cleaning operation was containerized and properly labeled in compliance with the requirements of the NESHAP regulation.

Summary of actions taken in response to Order IV:

Aria Contracting framed all openings and attached two layers of polyethylene sheeting to all openings in all buildings. The sheeting was then sealed from the inside to prevent airflow to the exterior of the buildings. Sealing of all six buildings was completed on August 31, 2012.

As per the NYS DOL Site Specific Varaince for each building, Stohl Environmental and Aria Contracting were responsible for continually checking and maintaining the integrity of the barriers. The barriers were checked until interior abatement of each building was completed. Please see table above in the summary of actions taken in response to Order II section of this report for interior abatement completion dates.

Summary of actions taken in response to Order V:

Stohl Environmental, LLC created a work plan for the Kensington Heights site in response to the EPA Compliance Order. The work plan addressed abatement and cleanup methods for the soil and tarmac, interior of buildings and sealing the contaminated dumpsters on site. As part of the plan Stohl Environmental performed inspection work of the contaminated soils and issued a Surficial Soils Asbestos Contamination Report in October 2011. A diagram was also submitted as part of the work plan to depict the locations of perimeter air sampling. The work plan was approved by the EPA on January 26, 2012.



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4. Conclusion

All items included in the EPA Compliance Order CAA-02-2011-1021 have been addressed for the Kensington Heights Site as observed by Stohl Environmental, LLC, the on site monitor for the project. All work completed as part of the EPA Compliance Order was done in accordance with the approved EPA Work Plan and NYS DOL Site Specific Variances for each building. The New York State Department of Labor confirmed, by visual inspection, that all friable asbestos has been removed.