

**Regional Environmental Demolition Inc.
6281 Wendt Drive
Niagara Falls New York 14304**

DEMOLITION WORK PLAN

**Contract No. 201
Rails on Main**

**2929 Main Street
Buffalo New York 14214**

Prepared by:
Regional Environmental Demolition Inc.
6281 Wendt Drive
Niagara Falls New York 14304

7/30/18

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1. INTRODUCTION

Regional Environmental Demolition Inc. (RED) Work Plan for the work to be completed at the Rails on Main Project, Buffalo, New York. This Work Plan will be used in conjunction with all other Project Plans to ensure a safe working environment and adherence to rules and regulations pertaining to all site project work. This document provides a systemic approach to the Demolition of the Structures on Site, sequenced demolition, loading of waste materials.

** Revisions will be reviewed/distributed as attachments to the original plan.*

2. PROJECT NAME

Rails on Main.

3. PROJECT OVERVIEW

2929 Main Street renovations entails a large scope. For this Demolition Plan we will be focusing on 2 Buildings being Removal and 1 being renovated. Work will be performed along Fence line limits. 98% of the Project will be performed with Excavators and Skid Steers, but some work will be by manual labor to minimize the dust, and environmental disturbance.

The size and quantity of motorized equipment in all work areas will also be kept to a minimum to limit the amount of ground and environmental disturbance from the project as well.

4. PROJECT LOCATION

The project is in Erie County, at 2929 Main Street Buffalo New York. The project corridor is located entirely within the New York State Dept of Environmental Conservation Region 9 jurisdiction, and EPA Regional Office 2.

5. SAFETY

5.1 Safety Policy:

RED Inc. Environmental, Safety, and Health Policy is the health and safety of all personnel and the public is of primary importance. To this end, the safety of the workers, the public and the environment will have precedence over cost and schedule. The policy is based on a sincere desire to eliminate occupationally induced injuries and illnesses. The prevention of injuries and illnesses is of such consequences that it will be given precedence over operating productivity or schedule pressures to the greatest extent possible. RED Inc. will provide training, monitoring, personal protective equipment, and facilities required for personal

health and safety. RED Inc. fully implements and embrace the Integrated Safety Management System (ISMS) by: involving all workers in work planning, hazard identification and analysis, development of controls, task execution and encouraging feedback and suggestions.

RED Inc. pledges to commit its human and material resources to achieving and sustaining Zero Accident Performance and Zero unplanned discharges or releases with respect to the environment.

RED Inc. will make every effort to ensure that all personnel fully comply with our “Safety & Quality First” Policy. No person will be required to work in surroundings or under working conditions, which are unsafe or dangerous to his/her, health.

5.2 **Integrated Safety Management – Work Control and Planning Process:**

RED Inc. is dedicated to establishing a work culture that comprises the elements advocated in the principles of its Integrated Safety Management System (ISMS).

RED embraces the core function elements to successfully implement the Integrated Safety Management (ISM) guiding principles;

- Line Management Responsibility for Safety
- Clear Roles and Responsibilities
- Competence Commensurate with Responsibility
- Balanced Priorities
- Identification of Safety Standards and Requirements
- Hazard Control Tailored to Work Being Performed
- Operations Authorization
- Worker Involvement

RED Inc. and supporting subcontractors will implement the ISMS core values and principles and make Environmental Safety and Health (ES&H) issues that affect our workers, the public, and the environment our chief concern when planning and fulfilling project tasks.

The process will include Integrated Work & Safety Plan development and documentation to include;

- Site Specific Environmental Health and Safety Plan (SSHASP)
- Sequenced Job Safety Analysis (JSA) Plans to include specific Activity Hazard Analysis (AHA's) – Attached for review purposes.
- Pre- Task Planning Briefings performed daily with crews.

5.3 **Competent Persons:**

RED Inc. will provide Competent Persons, as needed, for evaluation and inspection of demolition, excavations, fall protection, scaffolding, ladders, hoisting and rigging, and abatement of hazardous materials as needed. The Competent Persons will meet the OSHA requirements for such work and will be responsible for approving all pertinent activities and

conducting inspections. A current list of these competent persons will be compiled prior to the start of onsite work and will be documented in the SSHASP.

6. SCHEDULE AND WORK SEQUENCE

6.1 Schedule General:

The second key component to successful execution will be the Schedule. The project involves a multitude of specialty and challenging tasks. The key challenge will be to define all tasks and then integrate them into a comprehensive and efficient schedule of operations. RED will overcome the challenge by managing the Schedule and avoiding disruptions to the Schedule by proactively planning the work, and then working the plan.

The Schedule (attached) illustrates the overall sequence of work and interface of the various facets of the project. This Schedule will be further defined, and more detailed critical path tasks will be added. The Schedule is used to help manage the work and communicate key activities to the entire crew and customer, so everyone involved understands the interrelated nature of all site tasks and can see and understand the overall big picture and goals of the project. Key critical milestones of the Schedule, and meeting the dates established are also integrated into the Safety Incentive Program. The reason for integrating Schedule with the Safety Incentive Program is because RED believes it is not simply good enough to say that you "Work Safe" and not accomplish tasks and goals. The overall premise is to meet the project objectives of performing the work in the desired timeframe in a Safe and Compliant manner.

Throughout the project RED will utilize the Schedule to track the progress and identify competing factors and items that may cause delays to the project. The Schedule is utilized as a tool to track progress and monitor Schedule adherence. The Schedule will be formally updated as needed.

Work Sequence: (8 - 10 Hour work day schedule)

<u>Work Sequence</u>	<u>Crew Size (Average)</u>
<u>Mobilization:</u> 2929 Main Street	3-4
<u>Asbestos Abatement: Bld. 4</u> 2929 Main Street	5-6
<u>Site Preparation</u> 2929 Main Street	3
<u>Demolition: Bld. 4</u> 2929 Main Street	4-5

<u>Asbestos Abatement: Bld. 3</u> 2929 Main Street	6-7
<u>Demolition: Bld. 3</u> 2929 Main Street	4-5
<u>Asbestos Abatement: Bld. 2</u> 2929 Main Street	7
<u>Selective Demolition: Bld.</u> 2929 Main Street	7-8
<u>Concrete Removal:</u> 2929 Main Street	2-3

6.2 Key Personnel – Clear Lake Decommissioning Demolition Project:

<u>Name:</u>	<u>Title:</u>	<u>Mobile Phone:</u>
Enrico D. Liberale	Project Manager/Estimator	716-471-3134
Charles E. VanEpps	Site Superintendent/Lead Operator	716-949-8558
James Bryans	Job Foreman	716-990-6879

RED possesses a diverse group of dedicated demolition and environmental professionals with complementary skill sets and experiences can address any issue which may arise on the Rails on Main Project. Everyone on the RED Team is signatory to the RED philosophy that “Safety” is the most important facet of any job and all project managers and supervisors proactively embrace and practice the spirit and intent of the values expressed in the RED Health & Safety Plan (HASP).

6.3 Key Subcontractor Personnel ECMC Ramp Demolition Project:

CEF Plumbing

6.4 RED Management and Field Team:

RED's general approach is the Home Office staff provides "behind the scenes" support to the Site Management Team. The Home Office supports the Field Team with the functional aspects of project administration. Tasks typically performed by the Home Office are:

- Payroll & Employee Expense Processing
- Accounts Payable Function
- Compilation of Scrap Tickets & Revenue Collections
- Primary Maintenance & Heavy Equipment Overhauls
- Additional Site Support as Needed for Technical Permitting, Processing, Applications, Licenses, etc.

By performing the "functional tasks" off site, the Onsite Project Team can focus on the core tasks of performing a project safely and compliantly.

The Project Manager's duties are principally focused on the overall schedule and coordination of labor, materials, equipment and sequencing of work in line with permits, contract specifications and subcontractors.

The site superintendent is a field operations individual who directly oversees field activities for specific tasks performed.

The foremen are essentially task leaders. Typically, one project foreman will work with a crew which can range anywhere from one to seven persons. These specific work crews are assigned a specific task and work together in a safe manner to compliantly perform the work

6.5 **Equipment for Rails on Main Project:**

RED owns all the specialized equipment necessary to demolish the structures associated with the Demolition Project. Self-ownership of equipment is key to ensuring project completion in the desired timeframe. It also affords RED the ability to overstaff a project with equipment as a method of preplanning against breakdowns or unforeseen circumstances that could put the schedule in jeopardy.

The following is a listing of the **Primary types**, sizes and quantities of owned equipment that may be utilized on the Demolition Project at various times throughout the project duration:

- 2005 Komatsu PC400LC-7 Excavator with Shear
- 2011 Caterpillar 336 Excavator /Concrete Hammer
- 2007 Caterpillar 325 Excavator with Bucket/Thumb
- 2005 Caterpillar 321 Excavator with Bucket/Thumb
- 2011 Caterpillar D5M-LGP Dozer
- 2012 Caterpillar Skid Steer
- (2) Tri Axle Dump Trucks
- Pickup trucks with equipment trailers
- 1-Scissor Lift
- 4-Hepa-Filtered Vacuums
- 1-Decontamination Trailer
- 1-Dust Buster
- Waste Containers

All equipment mobilization notifications will be made well in advance of the estimated arrival date to allow adequate time for Owner inspection, if they choose to do so. The excavators will require some assembly onsite and will be assembled in accordance with manufacturer's specifications. Once assembled, the machines will be inspected and tested to ensure that they are in safe working condition and that all safety apparatuses are in place and functioning as designed. Equipment will be operated by competent, experienced, and properly trained employees.

7. ORGANIZATIONAL CHART

7.1 ***Rails on Main Renovation Project Organization Chart:***

A Site-Specific Organization Chart has been established for the Renovation Project Management Team. This chart (attached) illustrates the personnel and specific staffing proposed as well as the primary subcontractors intended to be utilized for the project.

8. PERMITS AND NOTIFICATIONS

8.1 **Notification/Permit Schedule:**

RED anticipates the following permit, approvals, and filings will be required Renovation Project. The date, agency and brief requirement controls are listed for each.

8.2 **Demolition Permits:**

City of Buffalo Demolition Permits are required per Building.

8.3 **Environmental Protection Agency (EPA) Notifications:**

Environmental Protection Agency notifications will be sent (10 working days) for this project and follow the guidelines regulated and required by Environmental Protection Agency for asbestos abatement and demolition projects accordingly with start and ending times.

8.4 **NYS Department of Labor – Industrial Code Rule 56 Notifications:**

Start Date of Asbestos Notification is 8/3/18

8.5 **Storm Water Pollution Prevention Plan (SWPPP):**

General Contractors Responsibility

8.6 **Utilities Protection Services (Dig Safe NY):**

RED will call Dig Safe NY prior to starting demolition or underground work. RED will coordinate required protections with all agency and utility companies.

9. Scope of Work

9.1 **Demolition and Renovations**

9.1.1 ***Site Protections and Erosion Control***

Mobilization will include setting up work health and safety equipment. The work areas shall be posted with demolition warning signs as well. Only workers will be authorized to enter the work area. No unauthorized personnel will be allowed access to the demolition area without approval from the RED site supervisor. This is to ensure the safety of all other trades and visitors.

Demolition and related activities must follow the "General Sequence of Demolition –Rails on Main Demolition. All erosion and sediment control devices will be maintained in working order until the site is stabilized. All preventative and remedial maintenance work, including

clean out, repair, replacement, re-grading, re-seeding, or re-mulching, must be performed as indicated on plans. After final stabilization has been achieved temporary sediment and erosion controls will be removed.

9.1.2 Hazardous Material Abatement

Will occur after all power is cut to all Buildings.

9.1.3 Utility Abandonments

Regional Environmental Demolition Inc. will work hand and hand with General Contractor.

9.1.4 Demolition

RED Inc.'s competent person will oversee the Demolition process. All parts of the Demolition will be completed with wet methods in place to ensure dust suppression. RED will Demolish from the top portion of the buildings and work their way to the bottom, hauling of concrete and rebar will happen along with Demolition simultaneously.

9.1.5 Earthwork and Site Restoration

Upon completion of the Demolition, the site will be left according to plans and specifications. After final stabilization has been achieved temporary sediment and erosion controls will be removed.

10. Attachments

1. Resumes of Key Personnel
2. Schedule
3. Licenses
4. Lead Plan
5. Building Materials Sampling Plan

ATTACHMENT 1

Resumes of Key Personnel

CHARLES VANEPPS

3695 Pine Avenue, Niagara Falls, NY 14301 | C: 716-949-8558 | cvanepps@redwny.com

Executive Profile

President/Owner of Regional Environmental Demolition, Inc. since 2009
US Marine Corp Veteran
Lead Heavy Equipment Operator
OHSA Certified
Hazmat Certified
Asbestos Supervisor Certified
SWPP Certified

Skill Highlights

- Business Owner Since 2009
- Lead Heavy Equipment Operator on All Projects
- Over 20 years Experience
- Industrial, Commercial and Residential Demolition
- Business development
- Project management
- Leadership/communication skills
- Oversee All Field Communications

Professional Experience

- Owner/Heavy Equipment Operator** Jun 2009 to Current
Regional Environmental Demolition, Inc. — Niagara Falls, NY
Asbestos Abatement Supervisor with continuing education on all laws and regulations. Main Operating Engineer on all projects. Prepares competitive subcontractor bids. Educates staff on the quality standards throughout the construction process. Reviews and investigates Proposed Change Order Requests. Stays consistent with project schedules. Acts as the liaison with company safety representatives to promote awareness and understanding of safety protocols.
- Heavy Equipment Operator/Supervisor** Jun 2004 to Apr 2008
Empire Dispmantlement — Niagara Falls, NY
Managed/Supervised projects day to day operations to ensure safety, productivity and profit. Heavy equipment operator
- Operator/Supervisor** May 1998 to Jun 2004
Mark Cerrone, Inc. — Niagara Falls, NY
Managed/Supervised projects day to day operations to ensure safety, productivity and profit. Heavy equipment operator
- Search and Rescue** Mar 1994 to May 1998
United States Marine Corp

Education

High School Diploma 1993
Lewiston Porter High School — Lewiston, NY, United States

Website

- www.redwny.com

ENRICO D. LIBERALE

6676 Cloverleaf Court, Niagara Falls, NY 14304 | C: 716-471-3134 | rico@redwny.com

Executive Profile

Vice President/Owner of Regional Environmental Demolition, Inc. since 2009

OSHA Certification

HAZMAT Certification

Asbestos Certification

Mold Remediation/Abatement Certification

Skill Highlights

- Business Owner since 2009
- Manage all R.E.D., Inc. Industrial, Commercial and Residential Demolition, Asbestos Abatement and Mold Projects
- Over 20 Experience
- Responsible for project management, estimating and negotiating
- Oversee all office and field staff
- Skilled in Project and Finance Management, Bidding, Tax Laws and Bonding

Professional Experience

Owner/ Office Manager **06/2009 to Current**
Regional Environmental Demolition, Inc. **Niagara Falls, NY**

Vice President of R.E.D., Inc.

Manages all personnel; Responsible for preparation of all bids/proposals; Efficient in reading blueprints; Knowledge of laws pertaining to Asbestos Abatement, Mold Remediation and Demolition; Reviews all Proposed Change Order Requests

Business Agent **05/2002 to 05/2009**
Laborer Local 91 **Niagara Falls, NY**

Secretary, Treasurer and Business Agent; Overseeing large scale projects; Acted as the liaison between laborers and general contractors.

Qualified competitive subcontractor bids prior to execution of contracts. Educated general contractor personnel on the quality standards throughout the construction process.

Laborer Foreman/Job Steward **06/1996 to 05/2002**
Laborers Local 91 **Niagara Falls, NY**

Mentored team members, providing guidance on proper techniques and safety. Assisted crews in erecting, repairing and the wrecking of buildings and bridges. Laborer on road construction, drainage and other various types of work.

Education

Bachelor of Science: Business Management **1996**
Buffalo State College Buffalo, NY, United States

Business Management **1995**
University Of Buffalo Buffalo, NY, United States

Associate of Applied Science: Political Science **1994**
Niagara County Community College Sanborn, NY, United States

JAMES BRYANS

6989 Nash Road, North Tonawanda, NY 14120 | C: 716-990-6879 | james@redwny.com

Profile

Asbestos Supervisor Certified
Hazmat Certified
Mold Abatement Certified
OSHA Certified
Heavy Equipment Operator

Highlights

- Over 9 years' experience in Asbestos Abatement and Demolition
- Heavy Equipment Operator
- Extensive knowledge of Demolition
- Project Management
- Exceptional Leadership and Communication skills
- Business owner of construction and remodeling company for over 18 years
- Exceptional problem solver
- Blueprint reading

Experience

- Asbestos Abatement Supervisor** Oct 2009 to Current
Regional Environmental Demolition, Inc. - Niagara Falls, NY
Asbestos Abatement Supervisor with continuing education on all laws and regulations. Responsible for supervising and coordinating day to day abatement operations. First line of communication between subcontractors and owners. Heavy equipment operator when needed. Responsible for daily log books and safety meetings. Heavy equipment operator when needed.
- Asbestos Abatement Supervisor** Oct 2008 to Oct 2009
National Vacuum - Niagara Falls, NY
Responsible for day to day asbestos abatement operations.
- Service Technician** Apr 2007 to Jun 2008
Naples Lumber - Naples, FL
Evaluate problems on windows and doors. Order parts and materials. Responsible for the installation of parts/materials and invoicing customers/contractors.
- Maintenance** Nov 2006 to Apr 2007
Lakeside Pavilion - Naples, FL
Repaired and maintained nursing home and grounds.
- Owner/ Self Employed** Mar 1999 to Oct 2006
Bryans Home Improvement - North Tonawanda, NY
Home Construction, Remodeling and Repairs
Responsible for all aspects of self-owned small business
- Owner/ Self Employed** Apr 1988 to May 1999
Great American Custom Builders - North Tonawanda, NY
Home Construction, Remodeling and Repairs
Responsible for all aspects of self-owned small business

ATTACHMENT 2

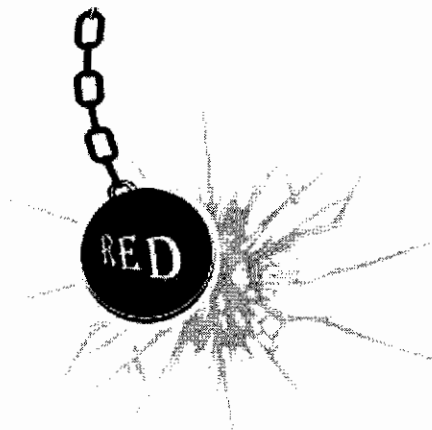
Schedule

REGIONAL
ENVIRONMENTAL DEMOLITION INC.
ASBESTOS ABATEMENT AND DEMOLITION SPECIALISTS

Rails on Main
2929 Main Street
Buffalo New York 14214

Asbestos Abatement and Demolition Schedule

7/30/18



Architect for the Project

Architectural Resources
505 Franklin Street
Buffalo New York 14202

CM for the Project

Buffalo Construction Consultants Inc.
6000 North Bailey Ave. Suite 2D
Buffalo New York 14226

Owner of the Project

Main and Hertal LLC.
C/O Metzger Inc.
4955 Chestnut Ridge Road
Orchard Park, New York 14127

Please be advised that the Project Schedule may change with weather conditions, field superintendent will make the call.

Asbestos Mobilization

8/4/18

Asbestos Abatement of Building 4

8/6/18-8/13/18

Asbestos Abatement of Building 3

8/14/18 – 8/24/18

Haz Waste Removal Bld. 4, 3 and 2

8/25/18 Depending on Transformers being cut off line.

Demolition of Building 4

8/14/18 – 8/17/18 Depending on Removal of Transformers on the Roof.

Demolition of Building 3

9/15/18 – 10/15/18 Depending on the Removal of Transformers

Asbestos Abatement of Building 2

8/25/18 – 9/15/18

Interior and Exterior Renovations of Building 2

9/17/18 – 10/23/18

Demobilization

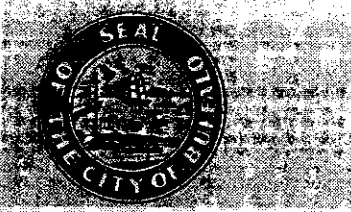
10/25/18 – 10/30/18

Any questions please contact our office. Enrico D. Liberale and Charles E. VanEpps will be handling this Project direct.

**6281 Wendt Drive - Niagara Falls, New York 14304 – USA
Telephone: 716-284-3366 Mobile: 716-471-3134 Fax: 716-284-7331 E-mail rico@redwny.com**

ATTACHMENT 3

Licenses



CITY OF BUFFALO
 Department of Permit & Inspection Services
 Office of Licenses

65 Niagara Sq Rm. 301
 Buffalo, NY 14202
 (716)851-4078



Byron W. Brown
 Mayor

James Comerford
 Commissioner

DEMOLITION GRADE 3

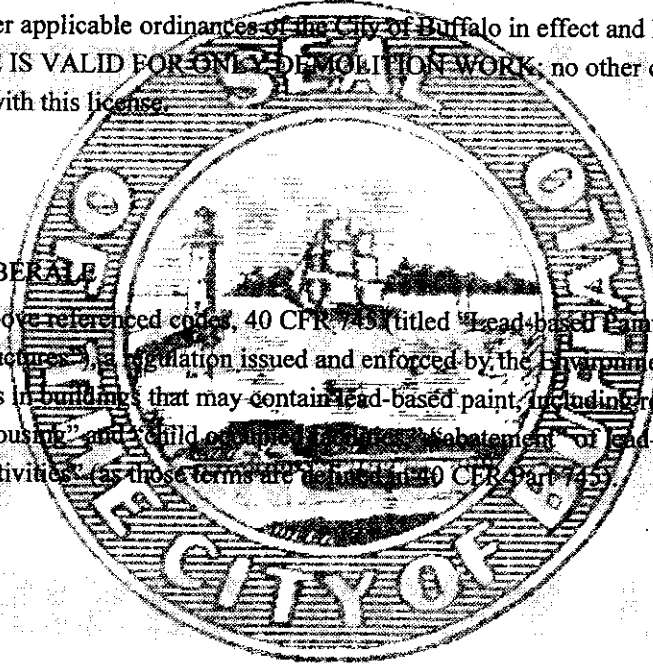
CHARLES VANEPPS
REGIONAL ENVIRONMENTAL DEMOLITION INC.
6281 WENDT DR
NIAGARA FALLS, NY 14304-1100

License Number
 DM314-10027905

To perform demolition WITHOUT THE USE OF EXPLOSIVES, on any structure, no restrictions as to stories or height. Subject to All State and Federal laws and in accordance with Chapter 144, Section's 1-14 and all other applicable ordinances of the City of Buffalo in effect and hereafter adopted. THIS LICENSE IS VALID FOR ONLY DEMOLITION WORK; no other construction work may be performed with this license.

PARTNER: ENRICO LIBERALE

Note: In addition to the above referenced code, 40 CFR 745 titled "Lead-based Paint Poisoning Prevention in Certain Residential Structures", a regulation issued and enforced by the Environmental Protection Agency, applies to certain activities in buildings that may contain lead-based paint, including renovations performed for compensation in "target housing" and "child occupancy facilities", abatement of lead-based paint hazards and other "lead-based paint activities" (as those terms are defined in 40 CFR Part 745).



Date Expires: 09/30/2018

Patrick A. Cole Jr.
 Director of Permit & Inspection Services

License holder is responsible for renewal of license within 30 days of expiration date.
THIS LICENSE IS NON-TRANSFERRABLE



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

Regional Environmental Demolition, Inc.
6281 Wendt Drive
Niagara Falls, NY 14304

FILE NUMBER: 09-47176
LICENSE NUMBER: 47176
LICENSE CLASS: FULL
DATE OF ISSUE: 07/27/2017
EXPIRATION DATE: 08/31/2018

Duly Authorized Representative - Enrico Liberale

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



CITY OF BUFFALO
 Department of Permit & Inspection Services
 Office of Licenses

65 Niagara Sq. Rm. 301
 Buffalo, NY 14202
 (716)851-4078



Byron W. Brown
 Mayor

James Comerford
 Commissioner

SPECIALITY CONTRACTOR

CHARLES VANEEPS
REGIONAL ENVIRONMENTAL DEMOLITION INC.
 6281 WENDT DR
 NIAGARA FALLS, NY 14304

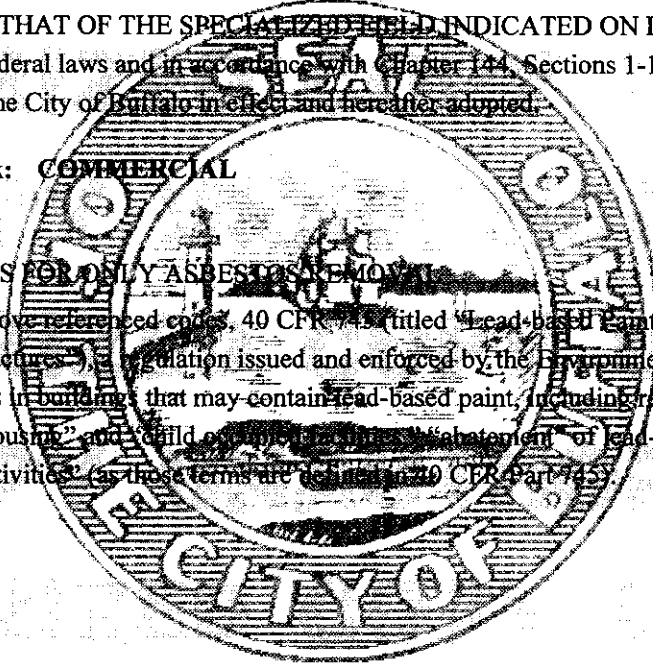
License Number
 SPC11-556128

To perform construction work which involves the use of a specialized skill, trade, or craft on residential, commercial, or mixed structures as so designated on license. ALL WORK PERFORMED MUST BE LIMITED TO THAT OF THE SPECIALIZED FIELD INDICATED ON LICENSE. Subject to all State and Federal laws and in accordance with Chapter 144, Sections 1-14 and all other applicable ordinances of the City of Buffalo in effect and hereafter adopted.

Type of Work: **COMMERCIAL**

THIS LICENSE ALLOWS FOR ONLY ASBESTOS REMOVAL

Note: In addition to the above referenced codes, 40 CFR 743 (titled "Lead-based Paint Poisoning Prevention in Certain Residential Structures"), a regulation issued and enforced by the Environmental Protection Agency, applies to certain activities in buildings that may contain lead-based paint, including renovations performed for compensation in "target housing" and "child occupancy premises," abatement of lead-based paint hazards and other "lead-based paint activities" (as those terms are defined in 40 CFR Part 743).



Date Expires: 09/30/2018

Patrick Sole

Director of Permit & Inspection Services

License holder is responsible for renewal of license within 30 days of expiration date.

THIS LICENSE IS NON-TRANSFERRABLE



ATTACHMENT 4

Lead Plan

Lead Plan For 2929 Main Street Demolition

Introduction:

The following guideline has been prepared to assure that employees of Regional Environmental Demolition who are working in the area of lead based paint emission, from blasting, cutting or otherwise causing lead based paint to be disturbed and lead to count to exceed the action level, are provided with the state of the art safety equipment and procedures.

Purpose:

This procedure is established requirements that are in compliance with OSHA's 29 CFR 1926.62 this program will provide the guidance for projects that involve the potential for exposure to lead.

Site Specific Project Work:

The project consists of the Demolition of 2 Buildings and the Interior Gut of a 3rd Building located at 2929 Main Street also known as The Rails on Main. Regional Environmental Demolition Inc. personal will strategically Demolish sections of the Buildings using 336 Cat Excavators and Dust Suppression Misters, to reduce the potential for lead exposure. The steel, ACM Debris and Masonary will then be removed by mechanical excavators for staging and disposal. The Building will be Demolished with Non-Friable ACM in Place, all debris associated with the ACM will be sent to a NYS Certified Landfill to accept such material.

Scope:

The lead program will cover the hazards associated with lead controlling those hazards, PPE, air monitoring, respiratory protection.

Specific Responsibilities

- Respiratory Protection Equipment
- Protective Clothing
- Training
- Medical Surveillance
- Air Sampling
- Work Procedures

Project Team:

NAME	TITLE	PHONE #
Enrico Liberale	Project Manager	(716) 471-3134
Charles VanEpps	Superintendent	(716) 949-8558
James Bryans	Foreman	(716) 990-6879
Mark Cotter	CIH	(716) 480-2125

Definitions:

Lead action Level – This is the level of airborne dust containing lead at or above 30 ug/m³

Lead Containing Material – Paint containing lead in a percentage of greater than .8%

Employee Exposure Level – No employee blood lead level shall exceed 40 ug/dl any employee that exceeds that level will be removed from work area.

Site Specific Safety Equipment:

- Job site work trailer
- Hand wash station / soap
- Hepa-Vacuum
- Respirators / Wipes
- Disposable/re-useable coveralls
- Gloves
- Face Shields
- Signs
- Disposable Towels
- Air sampling equipment

I. RESPIRATORY PROTECTIVE EQUIPMENT

Respiratory protective equipment is selected by using the OSHA standard (29 CFR 1910.1025) to identify the type of Respiratory Protection Required, based on the lead exposure and OSHA 1926.62.

Selection of Respiratory Protection

Exposure Level	Respiratory Selection	Outer Work Clothes	Change Area	Hand Wash Area	Showers	Biological Monitoring
<30ug/mg/m ³	Recommend dust mist	Will wear outer suit	No	No	No	Yes
>30 but <50mg/m ³	½ face P-100	Will wear outer suit	No	No	No	Yes
>50 but <500mg/m ³	½ face P-100	Will wear outer suit	Yes	Yes	Yes	Yes

>500 but <2500mg/m ³	Full Face PAPR P-100	Will wear outer suit	Yes	Yes	Yes	Yes
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All employees who wear respiratory equipment shall comply with Regional Environmental Demolition Inc. Respiratory Program.

Regional Environmental Demolition has completed a Negative Exposure Assessment for similar work in September 2017. The work required the Demolition of lead containing paint. The results were below the OSHA exposure level. Regional Environmental Demolition will start their employees in ½ face respiratory protection for this project, and perform air monitoring for 2 days to confirm their previous results and work procedures.

II PROTECTIVE CLOTHING

All employees potentially exposed to lead above the permissible exposure limit (PEL) must use appropriate protective work clothing to include:

1. Employees shall wear coveralls (Tyvek or equivalent) or will be issued on a daily basis, a pair of washable coveralls.
2. Employees are required to wear steel toe boots
3. Employees will be issued a pair of impervious gloves (rubber or rubber/material combination).
4. Employees working in a high concentration of airborne dust will wear a head cover, such as a hood, under hard hats. Employees working in less dusty areas may wear hard hats only when approved by site supervisor.
5. Ear protective devices shall be provided in high noise areas and these units shall be used on a mandatory basis.
6. Other safety equipment, such as, high visible clothing, safety belts and lanyards, will be issued routinely as required.
7. All provisions of the company's Safety Manual must be adhered to.

All contaminated clothing will be disposed of in containers provided for this purpose.

All lead contaminated clothing will be carefully placed in containers with lids to prevent dispersion of lead into the atmosphere. Employees will be instructed in the proper handling of contaminated items.

III. JOB WORK PROCEDURE

Signs:

The following warning will be posted in each work area where lead levels exceed the permissible exposure level (PEL):

**WARNING
LEAD WORK AREA
POISON
NO SMOKING OR EATING**

These signs must be clearly visible at all times.

Job Site Trailer:

A job site trailer will be provided with a washing station for the employees so they can wash hands and face, prior to eating drinking or smoking. The trailer will provide a location to change clothes and store safety equipment.

Pre-Work Hold:

All employees shall comply with the medical examination section of this safety procedure prior to beginning any work in a lead environment. The foreman is responsible to assure that this section is complied with.

A pre-work safety meeting shall be conducted to assure that employees understand the safety requirements of this job. This safety meeting will advise employees of their responsibilities and compliance with the safety procedures. Documentation shall be required to verify attendance.

Work Procedure:

1. Employees will be issued safety equipment by the foreman or safety monitor, who assures that employees comply to the proper dress code of coveralls, gloves, hard hats, head covers as required, and foot covers.
2. Following issuance of all pertinent safety clothing, the employees will report for work.
3. Street clothing will be left in the clean area of the shack or trailer.

Lunch/.Break Procedure:

1. Employees will be vacuumed and/or brushed off prior to showering as they leave the

contaminated area for the area in which to take a break, smoke, or eat lunch. Blowing down with compressed air is not allowed.

2. Employees shall remove their respiratory equipment and gloves and place them in their respective storage areas (five [5] gallon covered bucket or in other designated storage areas).
3. Employees will not smoke, eat, drink or apply cosmetics in the lead-contaminated area. No food, beverage or tobacco products will be taken into the area. Food and beverage consumption will be allowed only in areas sufficiently distant from the work area to prevent contamination from the work operations. Employees must wash their hands and face prior to eating, drinking, or smoking Adequate washing facilities will be provided for employees.
4. Employees shall take their break or lunch and obtain their safety gear and then return to work.

End of Shift Procedure:

1. Employee will be vacuumed and/or brushed off as he leaves the work site or containment area by a co-worker or safety monitor.
2. Employees will go to their respective safety equipment storage area and after cleaning their gear, shall store it in the area and seal it.
3. Employees will dress in street clothes and leave the work site without entering a contaminated area.

IV. MEDICAL EXAMINATIONS

Employees shall be given the following blood lead level examinations as outlined whenever the action level is exceeded. (This level is found by monitoring with air samplers or using historical data from other work experience that is used as a comparative measuring device.)

The examinations are basically given on the following times frames:

1. Blood lead examinations are to be given to all employees who work or may work in an area where the lead level is above the action level for more than 30 days per year. (Action level is: 30 micrograms per cubic meter of air over an 8 hour exposure.)
2. This will be repeated every six months to any employee who is at or above the action level for a period of 30 days or longer per year.

All medical surveillance must be performed by or under the supervision of a licensed physician.

You must give the following to the examining physician:

- A copy of the lead regulations.
- A description of the employee's duties as related to exposure.
- A description of personal protective equipment used.
- All blood lead levels and all prior written medical opinions that we have on file for employees to be examined.
- Physicians must also be instructed to immediately send us test results including, but not limited to, the blood lead level tests, written results of medical evaluations, etc. We are required to keep this information on file for all employees exposed to lead.

Compliance with these requirements should protect most workers from the adverse effects of lead exposure, but only medical surveillance of employees exposed to lead can determine if employees are being properly protected against the hazards of lead.

Medical surveillance must be made available to all employees exposed to lead for more than 30 days a year. It is a requirement that every employee who is working in the area of abrasive blasting to remove a coating containing lead have his blood lead level tested at the beginning of the project, at the end of the project, and at least every six months.

Employees may have to be tested more frequently and may have to be removed from duties resulting in lead exposure:

- If a worker's blood lead level (PbB) exceeds 40 µg/100g, the monitoring frequency of blood lead level tests must be increased from every 6 months to at least every 2 months and not reduced until two consecutive blood lead level tests indicate a blood lead level below 40 µg/100g. Every time a blood lead level test is over 40 µg/100g, the employee must be notified in writing within five working days of receipt of the test results. The employee must also be informed that the standard requires temporary removal from duties resulting in lead exposure when blood lead level exceeds certain criteria.
- Employees removed because blood lead levels were too high must be given a monthly blood lead level test.
- Medical removal is to continue until two consecutive blood lead levels are 40 µg/100g or less.
- An employee must be removed from any work involving excessive lead exposure when: the purpose of this removal is to cease further lead absorption and allow the body to naturally excrete lead which

has previously been absorbed.

- A blood lead level of 60 $\mu\text{g}/100\text{g}$ or greater is obtained and confirmed by a second follow-up blood lead level performed within two weeks after the employer receives the results of the first blood sampling test.
- The average of the previous three blood lead determinations or the average of all blood lead determinations conducted during the previous six months, whichever encompasses the longest time period, equals or exceeds 50 $\mu\text{g}/100\text{g}$, unless the last blood sample indicates a blood lead level at or below 40 $\mu\text{g}/100\text{g}$, in which case the employee need not be removed.

A zinc protoporphyrin (ZPP) test is a useful blood test which measures the effect of lead on the body. This test is not required but may be performed if recommended by the physician.

V. AIR SAMPLING

Personal Sampling Guidelines

Personal sampling involves taking Permissible Exposure Limit (PEL) samples, usually for a duration of 4 to 8 hours, and Short Term Exposure Limit (STEL) samples for a duration of 30 minutes. The supervisor should stay on-site during the time of sampling unless otherwise directed by his/her supervisor.

The contractor is required to sample 25% of his workers for each given day. The contractor will dictate on whom and how many samples will be taken each day. Personal air samples and pumps are handled somewhat differently than the stationary air pumps. The fully charged, calibrated, and running pump should be mounted on the worker at waist level with the tubing running up the back and over the workers shoulder to the cassette which is taped on the lapel. The worker wears the pump inside the work area while he works and must clean off the pump before returning it to the technician. When the pump is returned the technician should check the calibration and turn it off. If the personal pump is received from the worker at the end of the sampling period and it is no longer running the technician will ask the worker at what time the pump was stopped and this will be recorded as the stop time. If the worker does not know when the pump stopped the technician will not mark down a stop time and a volume will not be calculated. The sample will be analyzed and the results reported in fibers per millimeter squared.

Personnel	-Short Term Exposure Limit samples (30 minutes)
	-Permissible Exposure Limit samples (4-8 hours)

Flow Rates and Volumes

It is important that the technician exercise good judgment in setting pump rates. Very often, the longer the sample collection, the more representative will that sample be of the air around the work area. Since this will depend on the equipment available, the number of samples to be

collected, and the time allotted for the air sampling, the technician should exercise care in budgeting his time.

The table of rates and volumes located below was designed to comply with the applicable regulations and methods while still allowing the technician flexibility when sampling.

The following chart outlines sample flow rates and volumes that are desired

Type of Sample	Collection Rate (LPM)	Sample Volume (Liters)	Filter Type
<i>Personal</i> TWA	*0.5-2.5	400+	0.8um MCE 37mm
STEL	*0.5-2.5	60-120 (30 Min)	0.8um MCE 37mm

VI. DOCUMENTATION

Documentation of this procedure will be performed by the supervisor or designated person on the job. He/she will assure that all forms are signed and completed as outlined.

Documents include safety meeting rosters and safety equipment rosters. Medical records shall be maintained separately from employment files, with access on a need-to-know basis.

Records shall be maintained for a period of not less than 40 years or for 20 years plus duration of employment, whichever is longer.

Accurate records will be maintained of the following:

- The name, social security number, and job classification of employees monitored for lead.
- The type of respiratory protection worn by each employee exposed to lead.
- Medical records for all employees exposed to lead. These records shall include:
 - A copy of the physician's written opinions.
 - A copy of the medical examination results including medical and work history.
 - Results of laboratory procedures performed.
 - Blood lead level test result.
- An accurate record of dates an employee is removed from duties due

to lead exposure and the dates he returns to work.

- Any employee medical complaints related to exposure of lead.
- Results of any airborne exposure monitoring conducted on the jobsite.

VII. SAFETY MONITOR OR SAFETY WATCH RESPONSIBILITIES

Compliance to the lead work safety procedure is enforced and documented by the Safety Monitor. Additional responsibilities may be added as the job requires. Basic responsibilities are outlined below:

1. Prior to the start up of any lead work, a pre-work safety meeting shall be held with the crew. All safety procedures and regulations will be explained in detail in this meeting.
2. Supervisor issues safety equipment and reviews appropriate procedures for its use.
3. Safety Monitor provides air sampling equipment and interpretation of results
4. Safety Monitor assures that all employees have had their pre-work physical examination and that this record is maintained on file as part of the documentation.
5. Safety Monitor monitors the work site to assure that all safety procedures are being complied to and that all protective equipment is used in the proper manner.
6. Safety Monitor is responsible for seeing that all safety signs/barricades and warning devices are positioned prior to work beginning. (Note - all signs outlined in Standard are to be complied with.)

VIII. EMPLOYEE RESPONSIBILITIES

1. All employees will comply with the safety requirements outlined in this lead safety work procedure.
2. Employees will provide disposable towels on a daily basis.
3. When an employee takes a break from the job, he/she should be vacuumed off and then proceed to the wash facility where he/she will wash their hands and face prior to smoking, drinking or eating.
4. Employees will wear protective devices, including respirators, while working in areas which require them. They shall not remove the devices until they remove themselves from the areas of contamination.

5. Employees shall inspect their safety equipment daily and assure that it is in good condition prior to entering the work area. Anytime any safety equipment is in need of repair, it shall be brought to the attention of the supervisor for immediate action to be taken.

7. Anytime that the scope of the work changes, there is a possibility that additional safety requirements shall be required. In this case, an additional safety meeting may be held to discuss these changes/additions to the responsibilities of the supervisor/hourly employee.

8. All persons entering a company controlled containment or area requiring this procedure, must observe all applicable portions of this procedure.

These procedures are a condition of employment for Apollo:

IX. TRAINING EQUIPMENT

- A. Employees to be trained:
 - a. Employees of the Company
 - b. Contract Employees
 - c. Sub-Contract Employees

- B. How training is implemented:
 - a. Classroom-Job Site
 - b. Visual/Audible where applicable
 - c. Hands on training with personal protective equipment

- C. Frequency of training
 - a. Annual Training
 - b. Job Site Specific

- D. Who conducts the training:
 - a. Safety Personnel
 - b. Supervisory Personnel
 - c. Safety Consultant

- E. Documentation of training:
 - a. Meeting/training rosters
 - b. Sample MSDS for training purposes

- F. Hazard Communication / MSDS

All employees must be aware that the HAZARD COMMUNICATION STANDARD REGULATION is available to read at any time..

The HAZARD COMMUNICATION STANDARD IS KEPT:

LOCATION: ***Job Site Trailer***

A copy is also maintained in the Corporate Office

- G. Whether the hazardous chemical is listed in the National Toxicology Program (NTP) Annual Report on Carcinogens (latest edition) or has been found to be potentially carcinogenic in the International Agency for Research on Cancer (IARC) Monographs (latest edition) or by OSHA.

- H. Any generally applicable precautions for safe handling and use which are known by the manufacturer's importer or employer preparing the MSDS, including appropriate hygienic practices, protective measure during repair and maintenance of contaminated equipment, and

procedures for clean-up of spills and leaks.

- I. Any generally applicable control measures which are known to the chemical manufacturer, importer or employer preparing the MSDS, such as, appropriate engineering controls, work practices, or personal protective equipment.
- J. Emergency and first aid procedures.
- K. The date of preparation of the material safety data sheet or the last change to it.
- L. The name, address and telephone number of the chemical manufacturer, importer or other responsible party preparing or distributing the material safety data sheet, who can provide additional information on the hazardous chemical and appropriate emergency procedures, if necessary.

X. SAMPLE TRAINING AGENDA

Training will include the following:

- The OSHA standards regarding lead exposure and our LEAD PROTECTION PROGRAM. A copy of our Lead Protection Program will be posted on all jobsite bulletin boards. Copies will be made available for employees who want them.
- The specific nature of the operations which could result in exposure to lead above acceptable levels, i.e., torch cutting to remove a coating containing lead.
- The purpose, proper selection, fitting, use and limitations of respirators:
- The purpose and a description of the medical surveillance program and the medical removal protection program, including information concerning the adverse health effects associated with excessive exposure to lead (with particular attention to the adverse reproductive effects on both males and females).
- The work practices to be associated with the employee's job assignment.
- Health Hazard Data which includes the following:
- Ways in which lead enters the body:

Lead can be absorbed into the body by inhalation (breathing) and ingestion (eating). When lead is scattered in the air as a dust, fume or mist, it can be inhaled and absorbed through the lungs and upper respiratory tract. Inhalation of airborne lead is generally the

most important source of occupational lead absorption. Lead can also be absorbed through the digestive system if lead gets into the mouth and is swallowed. If employees handle food, cigarettes, chewing tobacco, or make-up which have lead on them, or handle them with hands contaminated with lead, this will contribute to ingestion.

- Effects of overexposure to lead:

Taken in large enough doses, lead can kill a person in a matter of days. This is highly unusual but not impossible. Lead adversely affects numerous body systems and causes forms of health impairment and disease which arise after periods of exposure as short as days or as long as several years. Chronic overexposure to lead may result in severe damage to blood forming, nervous, urinary, and reproductive systems. Some common symptoms of chronic over exposure include loss of appetite, metallic taste in the mouth, anxiety, constipation, nausea, decreased sex drive, impotence and sterility in men. Lead can raise the risk of birth defects. Lead exposure in women may result in decreased fertility.

Prevention of adverse health effects for most workers from exposure to lead throughout a working lifetime requires that worker blood lead (PbB) levels be maintained at or below 40 micrograms per one hundred grams of whole blood. The blood levels of workers who intend to have children should be maintained below 30 micrograms per one hundred grams of whole blood ($\mu\text{g}/100\text{g}$). Once blood lead levels climb above $40 \mu\text{g}/100\text{g}$, the risk of disease increases.

Employees must play a key role in protecting their own health by learning about the lead hazards and their control, learning what the standard requires, following the standard where it governs their own actions.

Employees should immediately notify the Safety Superintendent of any signs and symptoms of health problems. They should also notify the Safety Supervisor if they have difficulty breathing during a respirator fit test or while wearing a respirator.

- A. Briefly describe the Hazard Communication Standard, commonly referred to as the "Right to Know Law". Show employees a copy of the standard, CFR 1910.1200 and explain that they may see a copy and any related MSDS at any time for review.
- B. Pass out a copy of the Material Safety Data Sheets so each employee may read through the sheet for himself, as you describe the points.
- C. Point out that a copy of the Hazard Communication Standard and all Material Safety Data Sheets may be found:

LOCATION: _____

- D. Explain that an inventory list of chemicals is kept and that any time a new chemical is added, details about the chemical will be explained and a copy of the Material Safety Data Sheet will be maintained.
- E. Discuss the labeling of chemicals in containers of 55 gallons or less. Explain what must be on the label, show sample label.
- F. Discuss measures that an employee must take to protect himself from hazardous exposure or the effects of exposure.
 - a. Example is the training program related to respiratory training (including respiratory protective equipment usage).
 - b. Protective equipment including clothing.
 - c. Point out the different noticeable signs of chemicals, such as odor, color, and such, that will aid them in identifying chemicals.
 - d. Teach job safety procedures including where safety showers and eye wash stations are located, escape routes and audible warnings.
- G. Explain which employees are to be trained:
 - a. Employees of the Company
 - b. Contractor employees
 - c. Sub-contractor employees
 - d. Frequent visitors to the work site/plant
- H. Explain how training is conducted:
 - a. Handout material where applicable
 - b. Slides/Visual/Audio where applicable
 - c. Hands on training
- I. Explain the frequency of training:
 - a. Annually on refresher basis
 - b. Initially on all chemicals
 - c. As new chemicals are introduced into the work place
- J. Explain that training is conducted by:
 - a. Foreman/Supervisor
 - b. Safety Department
- K. Documentation of training:
All employees will sign the Hazard Communication Training Rosters

XI. SUB-CONTRACTOR

When a contract to perform work is let permitting contract employees on Company controlled premises, the Supervisor of the contractor's employees will be informed of any hazardous substances, chemicals, or materials in the areas in which they will be working. They will also be

informed of any precautionary measure that they may have to take to protect themselves in the event of a mishap or spill and of any protective clothing or respiratory equipment they must have available to protect their employees.

It is necessary to inform these contract personnel in written form and to have it acknowledged in writing. This documentation becomes a record of compliance and remains a part of the Company records.

Compliance Checklist

- _____ Are all required warnings posted on your jobsite?
- _____ Have you included the required lead training in your weekly safety meetings?
Have you documented this training by having all who attend the safety meeting sign in?
- _____ Do you have accurate records on all of your employees who are exposed to lead?
- _____ Have you provided the physician who will examine your employees with all of the documents which you are required to furnish to him?
- _____ Have all of your employees who require blood lead level tests had them?
- _____ Have you provided to all employees who have had blood lead level tests written notice of their test results?
- _____ Is air sampling going to be conducted or required
- _____ Is all proper PPE and wash facilities available on-site

ATTACHMENT 5

Building Materials Sampling Plan

MEMORANDUM

Date: August 29, 2018
To: Andrew Zwack, NYSDEC; Stan Radon, NYSDEC
From: Jason M. Brydges, BE3
Subject: Main and Hertel BCP – **Building Material Sampling Plan**

Communications from NYSDEC to the Project Team at Main and Hertel have indicated that characterization of the building materials will need to be completed before anything is removed from the site or demolished (email dated 8-2-18) and a demolition plan will need to be completed outlining how the demolition material will be characterized prior to disposal (email dated 8-6-18). A subsequent conference call between the NYSDEC and Project Team occurred on 8-15-18 that further described the requirements for sampling building material resulting from the demolition and abatement of Buildings 3 and 4 on the Main and Hertel BCP Project. Finally, comments were received on initial submittal of the demolition work plans and have been incorporated into a single Demolition Work Plan submittal (email dated 8-23-18).

The current contractor has drafted a Demolition Work Plan and a Lead Plan for additional guidelines on lead-based paint control during demolition activities. This memorandum will be utilized in conjunction with these plans prior to and during demolition activities. Considering the information above and relevant/applicable State guidance, the following protocol describes the process to be followed to adequately characterize the structural material within Buildings 3 and 4:

Construction and Demolition (C&D) Debris – items such as wood, window, tile, roofing, drywall, and all ACM will be removed under a dust-controlled environment per OSHA standards and State Code Rule 56, placed into trailers with double lined polyethylene, and disposed at an approved facility (e.g., WM Chaffee, Casella Angelica, etc.). This waste will be managed under an Applicable Variance (AV – 56-11.5) - controlled demolition with asbestos in place.

Scrap Steel and Other Metals – metal items such as structural steel, conduit, rebar, piping, walkways, stairs, etc. will be separated from the other building materials (e.g., C&D debris, concrete, etc.) and placed into roll off containers (or similar) and recycled at an approved metals recycling facility.

Concrete, Wood and Brick – the floors and walls of Buildings 3 and 4 are constructed of concrete, concrete block, wood, and brick; and these items are the focus of this sampling plan because of potential impacts from past industrial processes and lead-based paint. Accordingly, the following sampling design will be established prior to demolition of these items:

1. Building 3 – first floor – 9 composite samples
 - a. Concrete floors: 6 composite samples, 1 from each room
 - b. Concrete block walls: 1 composite sample with each room represented in sample
 - c. Brick walls: 1 composite sample with each room represented in sample
 - d. Wood structure: 1 composite sample with each room represented in sample
2. Building 3 – second floor – 6 composite samples
 - a. Concrete floors: 3 composite samples, 1 from each room

- b. Concrete block walls: 1 composite sample with each room represented in sample
 - c. Brick walls: 1 composite sample with each room represented in sample
 - d. Wood structure: 1 composite sample with each room represented in sample
3. Building 4 – single room and single floor – 5 composite samples
- a. Concrete floor: 2 composite samples
 - b. Concrete block walls: 1 composite sample
 - c. Brick walls: 1 composite sample
 - d. Wood structure: 1 composite sample

Each composite sample will consist of approximately 5-7 individual, discreet samples based upon approximately 900 SF of area represented in each discreet sample. Various process areas, stained surfaces, and process pits will be considered during selection of the discreet sample locations. Composite samples will be collected, packaged, and shipped to an approved laboratory using standard methodology, and the samples will be analyzed for full TCLP analyses as dictated by the selected receiving facility. After receipt of the laboratory data the building materials will be characterized, packaged, and removed off-Site.

The following notes are related to the building material sampling plan and will be followed during abatement and demolition activities:

1. Sampling of paint chips alone for TCLP analyses is not necessary as the hazardous materials inspection report has already concluded the presence of lead-based paint throughout buildings 3 and 4 that are scheduled for demolition. In addition, paint chips alone will not be a waste stream generated on this project. Lastly, the characterization of paint chips as incorporated with other building materials will be addressed during the sampling plan described above with “Concrete, Wood, and Brick” and below with bullet #6.
2. If analytical results from the sampling program indicate the presence of any hazardous waste, then this material will be disposed of in accordance with State and Federal regulations.
3. If waste from the demolition and abatement activities is characterized as hazardous, then the CAMP, as outlined in in previous BCP documentation, will be implemented during hazardous waste removal.
4. Building 3 and 4 “process pits” were cleared of all sediments and waste prior to the previous owner’s RCRA small quantity generator permit closure requirements at the property; therefore, no pit sediments and wastes are anticipated to be encountered during demolition and abatement activities.
5. All disposal documentation of waste removed from the Site during the BCP project will be provided to NYSDEC.
6. In addition to the details provided in the Demolition Work Plan and Lead Plan, the following waste management protocol (the order of which will be determined in the field based upon project conditions) will apply to abatement and demolition activities once friable ACM is removed and building sampling has been completed as described above:
 - a. Prior to building demolition, potential lead-based paint chips/flakes will be collected and containerized within each building. After building demolition, this material will be combined with the material generated from bullet “d” below, characterized, and disposed at an approved facility.
 - b. Buildings will be demolished in a controlled manner utilizing adequate dust control measures (e.g., misting systems, hoses, spray guns, etc.) and proper excavation equipment with attachments (e.g., buckets, shears, grapples, hammers, etc.).

- c. Using mechanical means, demolition debris will be separated into four major categories (ACM non-friable, brick, concrete, and scrap metal), containerized, and transported off-Site at the approved receiving facility.
- d. Prior to removing building concrete building slabs-on-grade, potential lead-based paint chips/flakes and related suspect materials that are loose and accumulate on concrete slabs will be contained to prevent release to surface soil, sampled, characterized, and disposed at an approved facility.
- e. Building concrete slabs-on-grade will be demolished and transported off-Site to approved receiving facility under adequate dust suppression and environmental monitoring to control potential releases from impacted soil.