

SITE OPERATIONS PLAN

Temporary Facilities Plan

Environmental Products & Services, Inc. will provide a 32' x 8' mobile trailer office. The hauler includes a separate office with a second work area containing a built-in-desk shelving. Air conditioning will be provided. Electric hook-up as well as phone and fax lines will be provided. Mr. Syms has approved the placement of the office trailer south of building 31, east of the existing dog kennel. Anticipated placement of the trailer will be August 17.

Note - The location of the trailer was approved prior to awarding of Phase II of this contract. The office trailer will be placed as noted above.

Erosion & Sedimentation Control Plan

Town of Porter building inspector, Mr. Bill Smith, was notified of activities beginning August 10, 1998. No permits will be required by the town for this work as per Mr. Smith. This project is not considered a demolition (structures are not being razed).

Environmental Products & Services, Inc. will use all existing roads for vehicle traffic. It is anticipated that minimal storage areas will be required for clean fill and topsoil. Clean materials will be used within 48 hours of their placement in the storage area as indicated on the Component 2-Phase 1 plans by drawing number F-833-90-10 plate 3.

Clean fill will be placed on 6 mil poly sheeting at a height less than 25'. Straw bales will be placed around the perimeter of the poly to inhibit soil from sliding out of the staging area. Fill will be covered with poly if rain is in the forecast. All specifications and designs for staging areas, laydown areas, and decontamination areas are taken directly from the plans submitted to Environmental Products & Services, Inc. by the US Army Corps of Engineers.

Upon completion of soil excavation, new fill and topsoil will be placed and graded to existing soil levels using a Front-end loader and York rake. Backfill and topsoil will be provided by Modern Environmental.

All excavated areas will be backfilled within thirty (30) days. See backfill grading plan for additional information.

Utility Hook Up

Arrangements have been made with Mr. Syms to allow electrical hook-up with his existing electrical box to the office trailer. Lines will be run by Ferguson Electric of Niagara Falls, NY. Generators will be utilized asbestos abatement in area inaccessible to existing electrical supplies.

Bell Atlantic will provide two (2) phone lines and one (1) fax line to the trailer. Environmental Products & Services, Inc. will provide the phones and fax unit.

Two portable toilet facilities will be provided by Modern. Maintenance and pump out will be provided weekly.

A 500 gallon portable storage tank will be provided for non-potable water as needed.

Soil Backfill Grading Plan

Areas to be backfilled will be done upon completion of asbestos removal. Soil will be excavated and immediately placed into lined dump trucks for disposal.

Upon completion of excavation, three (3) inches of clean backfill will be tamped and compacted in place to 88%. Three (3) inches of topsoil will be graded to existing soil levels. Hydroseeding will be performed at the end of the project. All traffic will be prohibited from these areas. All specifications from section 02210 will be followed. Letters of certification for seed, topsoil and fill will be on file prior to their use.

Clean fill will not be brought onto the site until at least 80% of the excavation is complete. This staging area will be on the northern end of the property, east of area 27. Specifications for this staging area will be the same as stated under the Erosion & Sedimentation Control Plan.

Off-site/On-Site Hazardous Waste Management

Two 5 gallon and 16-1 gallon containers containing chronic acid from area T-1 and T-2 will be consolidated into one plastic 55 gallon drum. Empty containers are considered RCRA empty and will be permitted to be added to trash disposal. The hazardous drum will be transported by Environmental Products & Services, Inc. to Cycle Chem in Elizabeth, New Jersey for chrome reduction and treatment prior to final disposal.

Off-site/On-Site Non-Hazardous Waste Management

The oil drum found in building 602 is non-DOT shippable. The oil will be transferred in a new 55 gallon drum and shipped for oil reclamation. The old drum will be crushed and added to dumps for landfill.

Liquids found in building 30A will be consolidated into one 30 gallon drum for treatment. Empty glass containers will be discarded.

All drill cuttings and empty drums found in the southeast corner of the property will be added to the asbestos contaminated soil for landfill. Container #9 will be added to the acids from area T1T2. Containers #7 and #11 will be added to the hazardous drums from building 6-01.

All drill cuttings and empty drums found in the southeast corner of the property will be added to the asbestos contaminated soil for landfill.

The (3) unknown drums found in building 6-01 will be sampled for hazardous characteristics specifically ignitibility. It is anticipated all will be overpacked and treated as hazardous wastes for fuels blending and sent to Cycle Chem in New Jersey.

Recordkeeping

Shipments of all hazardous wastes will be on New Jersey manifests. The Army Corp. will be provided with the generator copies and Environmental Products & Services, Inc. will submit all others to the appropriate states. Bills of lading will be provided for all bulk shipments of asbestos and soil. Signed, accepted copies will be sent to the Army Corp. upon completion of the project.

Environmental Products & Services, Inc. will file for and provide the Army Corp. an EPA Identification # for shipment of the hazardous waste. Profiles describing the wastes will also be provided.

Spill Response

A response plan will be kept on file in the site office trailer for inspection by the Army Corp.

Exception Reports

In the event a shipping document is not received within 35 days of shipment, an exception report will be filled within two (2) additional days seeking clarification of non-receipt.

Qualifications

Will be submitted prior to job commencement.

Off-site Policy Compliance Certification

Will be submitted prior to job commencement.

Certificate of Disposal

Will be provided for all drummed waste for the approximate facility. Bulk shipments will provide a weigh ticket verifying load amounts. This is considered a certificate of disposal.

Packaging Certification

A copy of all shipping papers for all wastes will be provided at the commencement of the project for review. All generator copies signed by the receiving facility will be submitted within 35 days of shipment.

Notices of Non-Compliance and Violations

Immediately upon receipt of any notices, copies will be provided to the Army Corp.

Backfilling Grading Plan

Included in the site operations plan

Field Testing Control

Prior to receipt of any fill materials a letter provided by the supplier verifying "clean" and free from contaminants will be sent.

It is anticipated all "clean" materials will be brought onto the site and no existing materials from the site will be used as fill.

Satisfactory Materials

May be used to temporarily fill ditches for easier access to the various individual project sites especially T-1 and T-2. Upon completion of site work, area will be returned to its original condition.

Machines and Tools

Environmental Products & Services, Inc. will use the following equipment at the job-site:

- John Deere 490 Excavator
- John Deere 544 Front End Loader
- Gladall 36' Reach Forklift
- Case 586 Rough Terrain Forklift

Subcontractors will use:

- D5 Bulldozer
- York Rake and Skid Steerer
- Wood Chipper and Splitter

1.5 Sampling and Testing

No equipment will be used on-site requiring calibration.

1.5 Field Density

A letter verifying the "cleanliness" of the topsoil will be provided by supplier.

1.5 Waybelts and Delivery Tickets

All receipts for material delivered on site will be kept in the office field trailer.

1.5 Coarse Aggregate

No coarse aggregate will be necessary.

- 1.2 Seed-Certificate of Compliance
 Fertilizer - Certificate of Compliance
 Limestone - Certificate of Compliance
 Topsoil - Certificate of Compliance

All certificates for materials used will be kept on file in the office field trailer.

ASBESTOS HAZARD ABATEMENT PLAN

Lake Ontario Ordinance Works
Somerset Properties
Lewiston and Porter, NY

The New York State Department of Labor (DOL) has established regulations for asbestos activities within New York State via Section 30 of the New York State Labor Law. Industrial Code Rule (ICR) 56 is the regulatory standard used for asbestos abatement activities. These rules and regulations have been established for asbestos abatement projects for all licensed contractors performing work in the state of New York. New York State asbestos abatement regulations are increasingly more stringent than those required by the federal government.

Industrial Code Rule 56 establishes the engineering protocol for worker protection, work area preparation, removal, cleanup, and final air sampling in order to meet the specific criteria for the decontamination of asbestos-containing materials.

Environmental Products & Services, Inc.'s Asbestos Hazard Abatement Plan will be based entirely on the rules and regulations established by the New York State Department of Labor's Industrial Code Rule 56.

Building 6.01

General

Worker decontamination facilities will be constructed within a reasonable area near the building. An equipment storage/laydown area will be constructed for the decontaminated stored items and equipment. This area will consist of an area approximately 100'x 20', which will include three layers of 6-Mil Fire Retardant polyethylene. A decontamination chamber will be constructed for the washing of stored items. This area will consist of a tent like structure large enough to drive material handling equipment into the tent hauling miscellaneous stored items from the building. After entering the decontamination chamber, stored items will be pressure washed prior to being transported to the storage/laydown area. Wash water will be collected and filtered through a series of filters (25 micron then 5 micron) prior to being discharged to grade. All persons who enter within 25 feet of the structure will be wearing personal protective equipment (PPE), including tyvek suits, half-face respirators, hard hats, work boots, and work gloves).

Task 1

Contents of structure 6-01 will be removed via miscellaneous mechanical means when necessary, in addition to manual means of labor. Tagged materials and equipment will be transported to a decontamination area, as previously described, where they will be washed with amended water by using pressure washing equipment then transported outside of the confines of the established abatement area. The non-tagged equipment will be disposed of as construction debris. The decontaminated materials and equipment will be staged on a single layer of 6-Mil Fire Retardant polyethylene (if needed) and covered with an additional layer of polyethylene.

Building 6-01 (Cont.)

Task 2

All TSI on piping from both floor areas will be completed, as proposed to the New York State Department of Labor, in a site-specific variance. A copy of the approved variance will be forwarded to Environmental Quality Management and U.S. Army Corps of Engineers upon approval by the New York State Department of Labor. Environmental Products & Services, Inc. has requested relief of establishing a containment for piping waste and debris.

Task 3

Miscellaneous asbestos and non asbestos-containing materials will be removed from the floors of Building 6.01 manually. Workers will start at one end of the structure and work together in a patterned form to ensure full coverage of the flooring area. When asbestos materials are encountered, the materials will be wetted and placed directly into burial bags. The location of asbestos materials will be HEPA- vacuumed, including 12" on all sides where debris was located. Non asbestos items will also be placed in burial bags as needed.

Task 4

Transite panels located inside and outside the building will be transported either by mechanical means (forklift) or by laborers as required. Panels will be wetted prior to transporting to dumpsters that will be lined with 6-Mil Fire Retardant polyethylene. After dumpsters are filled, polyethylene liners will be sealed prior to transport to the landfill.

Task 5

Thirty-two bags of mortar located on the first floor below the stairway at the south end of the building will be wetted and then placed directly into burial bags. Remaining residual material remaining will be HEPA-vacuumed and pallet(s) will be disposed of as asbestos waste.

Task 6

All transite panel pieces inside and outside the building, including those partially covering or beneath scrap steel, will be manually, hand-picked and placed into container bags prior to being placed into the lined dumpster for transportation to a landfill. Where asbestos materials are on or attached to scrap steel, panels and pieces will be removed intact and treated as non-friable asbestos debris. Transite beneath scrap steel will be manually removed after heavy equipment has relocated the structural steel, to allow workers to access the asbestos containing transite.

Task 7

Roof flashings will be manually removed and treated as a non-friable material. Materials will be wetted, manually removed, and placed into temporary bags before being loaded into a poly lined dumpster.

Task 8

A majority of the caulk from seams of transite panels will be completed with the disposal of the panels (*Task 4*). The remaining material that has fallen will be manually placed into burial bags after being wetted. Residuals will be scrapped and HEPA-vacuumed.

Building 6-01 (Cont.)

Task 9

Bituminous expansion joint at the second floor level will be manually removed by prying material with scrapers, chisels, and/or screwdrivers in order to remove the expansion joint material. Upon removal, the wetted material will be placed into burial bags and disposed of as non-friable asbestos material.

Task 10

Thermal insulation on hoppers located on the second floor will be completed per the site-specific variance to be approved by the New York State Department of Labor. The proposed method will be to construct tent enclosures around the hoppers, apply negative air pressure ventilation, and manually remove the material after wetting. The material will be placed into burial bags for disposal as friable asbestos waste. The approved variance will be forwarded to EQM and USACE upon Department of Labor approval.

Task 11

Asbestos-laden soil will be removed with an excavator. Removed soil will be loaded into polyethylene-lined dump trucks, sealed when full, and transportation to the landfill.

Task 12

Backfill of soil excavation area will be completed by trucking soil to the area, dumping and then spreading soil with a front-end loader and excavator. Soil will then be topped with topsoil, graded, and hydroseeded to establish vegetative ground cover.

Task 13

Upon completion of abatement and cleaning of Building 6.01, the structure will be washed via a pressure washer, with a mixture of surfactant and water. The soil within 10 feet of the structure will be removed to a depth of 6", placed into poly lined dump trucks, then disposed of as asbestos-containing soil.

Task 14

Air Sampling requirements will be performed as per NYS Industrial Code Rule 56-17.

Task 15

Materials and equipment removed during *Task 1* will be mechanically (forklifts) and manually (workers) moved back into Building 6-01 from the temporary storage area. Tagged equipment and materials will be placed at a designated location acceptable to the property owner. All materials not being salvaged will be disposed of or recycled.

Buildings 6.02 and 6.03

Task 1

Transite panels located between buildings 6-02 and 6-03 will be moved by hand as required and arranged in a manner that will allow the use of a forklift to transport wetted panels to a dumpster roll-off container box which will be lined with two layers of 6-Mil Fire-Retardant polyethylene. Materials will be handled and disposed of as non-friable asbestos debris.

Task 2

Various quantities of asbestos containing thermal pipe insulation that has been stripped prior to piping removal will be completed in accordance with New York State Department of Labor applicable variance AV-105. Materials will be wetted and placed directly into burial bags for disposal.

Task 3

Building Clearance Sampling will be completed per New York State ICR 56-17. Both buildings will be considered small projects.

Building 30-A

General

Barrier tape will be placed around the building within 25 feet of the asbestos contaminated materials. All personnel within the area of the barrier tape will be trained in asbestos abatement and will don proper PPE prior to entering the area. Worker decontamination facilities will be remotely located. A decontamination area will be established for the stored equipment and materials at the south of the structure in the open field area. This decon area will consist of (3) layers fire retardant polyethylene sheeting with 2" x 4" lumber under the edges to create a containment area for the wash water. The wash water will be collected and filtered through a series of filters (5 micron and 25 micron) prior to being discharged to grade.

Task 1

All equipment and materials in the building will be removed by mechanical (forklift) or manually (workers) means. Items designated by the owner as salvageable (tagged) will be transported to the decontamination area for washing. All other non-tagged items will be placed into a dumpster for disposal or recycling. Salvaged items will be washed and transported to a temporary storage area and covered with polyethylene. Asbestos containing materials will not be removed during this task.

Task 2

Transite panels will be hand-loaded and transported to a poly lined dumpster for proper disposal.

Task 3

Thermal asbestos pipe insulation (friable) will be completed in accordance with New York State Department of Labor Applicable Variance AV-108. Tent enclosures will be constructed around the piping prior to insulation being removed by glovebag techniques.

Task 4

The bags of asbestos mortar mix will be thoroughly wetted and placed directly into burial bags as per NYS applicable variance AV-105. The wood paneling will be hand-sorted and inspected for mastic. Panels containing no-friable asbestos mastic will be transported to a poly lined dumpster for disposal.

Task 5

The area concentrated with transite steam pipes will be taped off with asbestos danger barrier tape prior to removal of steam pipes. Pipe sections and pieces will be loaded by hand or, if needed, moved with a forklift piece-by-piece to the poly lined dumpster for disposal. The ground previously occupied by piping will be searched by workers for any additional broken pieces left behind to be disposed.

Task 6

Removal of transite duct work from the exterior of the building will be completed at the same time as *Task 5*. Duct work removal will also include the use of manpower and possible mechanical equipment for lifting purposes. Removing residual waste will be completed by hand and, if needed, by HEPA-vacuuming area where duct was located.

Building 30-A (Cont.)

Task 7

Building 30-A will be sealed at all openings and pressure-washed. All wash water will be filtered through a series of filters from 25 micron down to 5 micron prior to being disposed of as clean wash water. Any debris too large for filtration will be placed into burial bags for disposal.

Task 8

Clearance testing will be completed according to Applicable Variance AV-108 and Industrial Code Rule 56-17.

Task 9

All items removed during *Task 1* will be removed from the temporary storage area and placed in an area within the building designated acceptable to the owner. Only items tagged prior to removal will be replaced. Items not tagged by the owner will be disposed of as construction debris or recycled.

Building T-1 and T-2

General

Since the structures have been previously torn down, only miscellaneous materials remain. These materials are both asbestos containing and non asbestos-containing. The non asbestos-containing materials will be removed to access the asbestos materials. Mechanical equipment will be needed to move materials. The area will be taped off with asbestos danger tape prior to the start of abatement activities. Only persons with the proper asbestos training will be allowed in the designated work area. All persons within the designated work area will be in proper PPE, including half-face respirators, work boots, work gloves, and polypropylene suits. Worker decontamination facilities will be remotely located as per In-plant operations of Industrial Code Rule 56.

Task 1

Removal of transite panels will be completed by using forklifts and workers to mechanically and manually transport panels to poly lined dumpsters. Panels will be wetted, sorted and stacked to assist in transportation to dumpsters.

Task 2

Removal of transite semi-circular lap panels will be completed by the use of workers and forklift equipment if needed, due to the size and weight of panels. The wetted panels will be loaded into poly lined dumpsters for disposal.

Task 3

Removal of asbestos-contaminated soil 10 feet from the existing concrete pad to a depth of (6) inches will be completed after *Tasks 1 and 2* have been completed. Excavation equipment will be used to remove soil. The soil will be placed into poly lined dump trucks, the liners will then be sealed prior to transport to the landfill for disposal.

Task 4

The area will be backfilled, covered with three inches of topsoil, graded to positive drainage, hydroseeded, and watered. An excavator and a front-end loader will complete the task of backfilling and spreading the topsoil. A York Rake will be used to grade prior to hydroseeding.

Pipe Bridge

Task 1

Asbestos-containing piping will be removed according to the New York State Department of Labor job-specific variance allowing for wrap-and-cut procedures for the piping without tenting. Where piping is to be cut, asbestos insulation will be glovebagged. Prior to cutting the pipes into eight-foot sections, piping and insulation will be sealed in two-layers of 6-Mil Fire-Retardant polyethylene. The pipes will then be cut and sections hauled, by fork lifts or front end loader, to lined dumpsters for disposal.

Task 2

The soil will be excavated to a depth of six inches within three feet of either side of the pipe. The soil will be removed by an excavator and loaded into poly lined dump trucks. In the event that asbestos piping insulation is discovered during excavation, pipe insulation will be properly disposed. The remaining piping and insulation that cannot be accessed will be encapsulated prior to being backfilled, graded and seeded.

Task 3

Excavated soil will be replaced with backfill and three inches of topsoil, using an excavator and front-end loader. The soil will then be graded for positive drainage and hydroseeded.

Clearing and Grubbing

Cleaning and grubbing will be completed by Modern Environmental Services. The subcontractor will not be required to provide an Asbestos Hazard Abatement Plan because they will not be associated with asbestos disturbance. Trees, brush and other vegetation will be cut flush with grade level. Trees designated to be left standing will be marked. Chain saws will be used to remove trees and brush. A tub grinder will be used to mulch all vegetation. Mulch will be added to rolloffs designated for landfill. A 10' x 10' area across the road from area D will be used as temporary staging area for mulched materials. 6 Mil poly will be placed on the ground and bales of straw will be placed around the area to permit runoff. All procedures in accordance with section 02110 of the final contract specifications will be followed.

Environmental Products & Services, Inc.

Plan Prepared By:

Dennis P. Breh, Contracts Coordinator
Corporate Office

F:\Comm\Com\9545DPB