



de maximis, inc.

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Windsor, CT 06095
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August 29, 2023

Ms. Kara Nierenberg, PE
Remedial Project Manager
EPA Region 1
5 Post Office Square, Suite 100
Mail Code OSRR 7-MI
Boston, MA 02109-3912

**Subject: Nuclear Metals, Inc. Superfund Site, Concord, Massachusetts
Remedial Design / Remedial Action
Enabling Phase Remedial Action
Revised Asbestos Abatement Work Plan**

Dear Ms. Nierenberg:

Attached please find the revised Asbestos Abatement Work Plan, including response to comments on EPA's conditional approval of the *Asbestos Abatement Work Plan dated August 18, 2023*. We would like to commence removal of the transite pipe in the vicinity of Building A starting on **Wednesday August 30, 2023**.

If you have any further questions or concerns, please contact me.

Sincerely,

For

Bruce Thompson
Project Coordinator

Enclosure

cc: Garry Waldeck, MassDEP
Grady Dante, MassDEP

Response to Comments

1. The plan assumes the pipe will be in easily detachable sections (e.g., bell & insert). If this is not the case and the pipe needs to be cut to be removed, then the plan should be updated to provide the method and measures to be taken to reduce or eliminate dust emission.

Response: We have included an addendum to the revised Asbestos Abatement Work Plan to include Mount Carmel's method and measures that would be taken if the transite piping needs to be cut to be removed.

2. Disposal of asbestos containing material is not currently included in the existing off-site rule request. An updated off-site rule request must be made approved prior to off-site disposal of the asbestos containing material.

Response: We will send an off-site rule request for the asbestos waste prior to off-site disposal.

3. Any changes to the final disposal of the material must be documented in the Work Plan.

Response: If the material is not approved by the off-site rule request to go to USEI's WDI facility in Belleville, Michigan, the work plan will be updated to reflect the new disposal facility.



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Mount Carmel Construction Abatement Work Plan

Mount Carmel Construction, LLC

Environmental and Demolition Contractors

Mount Carmel Construction, LLC

ASBESTOS ABATEMENT WORK PLAN

Project:
Nuclear Metals
Enabling Phase
Asbestos Pipe Abatement, Building A Exterior
2229 Main St Concord, MA

Table of Contents

- A. Site Specific Asbestos Removal Plan**
- B. Safety**
- C. Disposal**
- D. Air Monitoring**
- E. Regulated and Hazardous Materials**

- A. MCC will coordinate with US Ecology to abide by MassDEP, OSHA, and EPA procedures for Asbestos removal scope of work identified in the asbestos Inspection Reports:**

Asbestos abatement will be performed on the exterior during excavation of 600 LF of ACM pipe.

All ACM removal will be based on the items identified in the scope by US Ecology.

Abatement Description: Removal and disposal of asbestos shall be limited to the schedule provided in the specifications.

- Work will be performed in accordance with Federal, State, and Local Regulations.**
- The work area will be isolated from the public on the exterior with caution tape and cones.**
- MCC will pre-clean areas and set up initial plastic to cover work areas.**
- ACM pipes will be wrapped with plastic in place in 14-foot sections and carefully moved to the ACM -Waste dumpster.**
- Full PPE worn throughout along with a remote decon-chamber with water.**
- Barriers on the exterior and ground will be 6 mil plastic in thickness.**
- Asbestos Pipe will be removed as intact as possible to minimize breakage and eliminate fibers. Once removed, it will be wrapped with 6 mil plastic and labeled.**
- Warning signs will be posted around the work area.**
- MCC will use amended water to reduce fiber release.**

Asbestos Removal Work Plan

Mount Carmel Construction, LLC

Environmental and Demolition Contractors

- Pipe will be carefully excavated out on both sides. We are to detach pipe in sections completely in-tact.
- ACM -pipe will be double wrapped with 6-mil plastic.
- ACM- waste material will be labeled as per various requirements including generator labels. Waste will be manifested and put into an Asbestos Dumpster on site. The waste will be placed into an asbestos dumpster and closed and covered once full. It will all be properly labeled, wet, and manifested prior to shipment.
- Secure visual required by the State regulations and property owners for proof of proper disposal and work practices. Visual Inspection conducted by Envirocheck on all excavated areas of pipe and all wrapped pipes.
- Prior to commencement of work, MCC will submit a notification for DEP and all other relevant parties. All worker and contractor licenses will be onsite prior to work.
- MCC will forward a copy of the completed notification copy to US Ecology.

B. SAFETY

The following work practices will also be utilized in the work area as additional required safety measures:

- Our company promotes a safe workplace, free of accidents, using a safety meeting among the working crew every day before the start of the workday. Before the beginning of every workday our team will perform a safety meeting to discuss the day's tasks and goals and the safety measures to be taken to accomplish the day's goals safely. Meetings are documented on the job daily log. A weekly "Toolbox Talk" will take place on Fridays.

Personal Protection Equipment (PPE) and Use

Once the Pre-cleaning starts no one will enter the work area without wearing as a minimum the following personal protective equipment: ½ face respirator equipped with HEPA filters and fitted to each individual person, full body disposable suit equipped with a hood, safety glasses and hard hats. Laborers are further required to wear gloves and ear protection inside the work area.

Decontamination Process

Anyone who enters work area shall follow the following decontamination process to exit work area: Before entering Equipment room HEPA vacuum disposable suits thoroughly to ensure no visible ACM debris, proceed to equipment room and, without removing the respirator, remove safety glasses and hard hat and wet wipe and place inside the shower. Remove disposable suit and place in ACM bag for disposal. Proceed to walk into the shower wearing respirator, filters covered, or remove filters once in the shower and place HEPA filters inside ACM bag in the equipment room for disposal. Clean respirator, glasses, hardhat and finish showering thoroughly. Proceed to clean room, dry all equipment and finish dressing. Stow respirator into a protective bag for re-use.

Asbestos Removal Work Plan

Mount Carmel Construction, LLC
Environmental and Demolition Contractors

Daily Containment Inspections

Our competent person and crew will inspect the containment for breaches and damages prior to the removal of any ACM daily. Any deficiencies are to be resolved before proceeding with any ACM removal activities.

MCC is responsible for immediately reporting any breach in containment to US Ecology, Project Manager, and Owner's Representative Project Manager.

C. DISPOSAL

Waste Hauler: US Ecology

185 Industrial Rd, Wrentham, MA 02093

Disposal Facility: Michigan Disposal Waste Treatment Plant 49350 N -94 Service DriveBelleville, MI 48111 MID000724831 (800) 592-5329

Packaging:

- **Material will be packed, sealed and labeled according to the regulations.**
- **All ACM material will be transported by US Ecology to Michigan Disposal Waste treatment Plant.**
- **All waste shipments will be manifested as per regulations.**

Waste is packaged as previously described. Waste materials will be moved to the equipment room or materials transfer room. Packages will be wet wipe and HEPA vacuumed inside equipment room before double bagging/wrapping. Once double bagging/wrapping is completed waste will be placed into the holding room or shower room area.

Container is inspected by the supervisor for correctness and is labeled for disposal per regulations and specifications. Packages are then moved into a clean area and transported to an enclosed trailer parked in an area designated by the GC outside of the building. Our competent person will prepare a manifest in accordance with project protocols in preparation for the removal and pick up of the trailer by US Ecology. US Ecology will be hauling the ACM to its destination (Michigan) as written on the last section of the manifest. Disposal manifests will be signed by the landfill and returned to the owner within 30 days of disposal.

GENERATOR AND/OR HAULER REQUIREMENTS

The asbestos materials will be packaged in impermeable dust tight containers (i.e., six (6) mil plastic bags or double 6 mil poly film) All containers will be labeled in large legible letter:

DANGER -CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST

CANCER AND LUNG DISEASE HAZARD

Asbestos Removal Work Plan

D. AIR MONITORING

Mount Carmel Construction, LLC

PO Box 2098 North Haven, CT 06473 P (203) 234-8488 (F) (203) 230-9878

NHCC Lic # NHC.0012608 HIC Lic # 0613595 RRP Lic #NAT30387-1 Asbestos Lic # 00047 Lead Lic # 002195

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MCC. will assume the responsibility of all OSHA required Personnel Monitoring. Personal air sampling shall be conducted daily during the abatement of asbestos and sent to a licensed facility for analysis.

E. Final Cleaning

MCC will remove all visible accumulations of asbestos material and debris. All surfaces within the Work Area will be cleaned to a condition of no visible debris. If the Project Monitor finds visible accumulations of dust or bulk asbestos containing materials in the work area, MCC will repeat the cleaning until the work area complies.

The following close-out documents will be submitted to GC upon completion of the work as required under specification documents.

Mount Carmel Construction, LLC
Environmental and Demolition Contractors

Mount Carmel Construction, LLC
Addendum to ASBESTOS ABATEMENT WORK PLAN

Project:
Nuclear Metals
Enabling Phase
Asbestos Pipe Abatement, Building A Exterior
2229 Main St Concord, MA

In the case that the pipes do not come apart where the clasps and bolt meet; and cutting or breaking is necessary, we are to follow all exterior guidelines by the EPA and MASSDEP regarding containing all asbestos fibers and debris.

We are to wet down the entire work area, wet the pipe, put a drop cloth or plastic beneath the pipe, wrap in 2 layers of 6 mil before cutting or breaking the pipe. Once the area is wet down and underneath the pipe contained, we will cut or break in place, carefully bagging any loose pieces trying to keep the wrapped pipe intact as much as possible to limit airborne exposure.

The loose pieces will be double bagged with 6 mil black bags and labels, and the whole pipe will be double wrapped with 6 mil plastic, labeled, and carefully lifted into asbestos dumpster.

All other necessary guidelines discussed in original ASBESTOS ABATEMENT WORK PLAN submitted regarding plastic, labels, Tyvek suits, respirators will be followed.

For any questions or concerns please do not hesitate to contact us below.

John M. Acanfora, MBA
Mount Carmel Construction, LLC.
Project Manager
CELL: (203)-687-2023
FAX: (203)-230-9878
EMAIL: johnacanfora@aol.com

R:\Projects\DE\demax-1547\3215-NMI NTCRA Data Analysis\GISData\Projects\Utility Map Updates

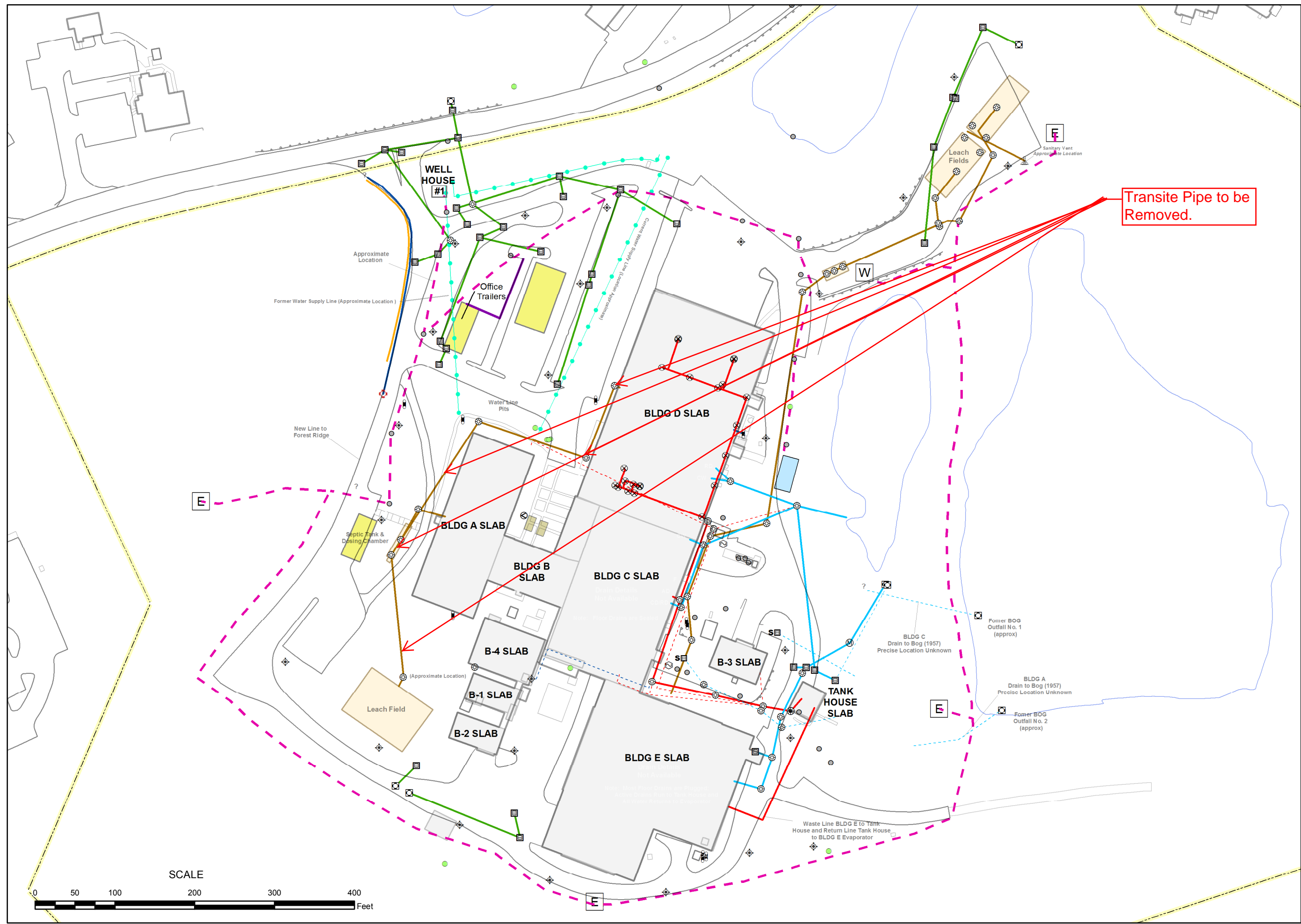


Figure 4
POST REMOVAL
UTILITIES
Final Report

Nuclear Metals Inc. (NTCRA)
Concord, Massachusetts

Description:
Source:
Basemap data including
Utility points and lines
provided by AMEC.
Details originated from
Site Engineering Drawings.

Map Legend:
Catch Basin
Gas Gate
Sealed Catch Basin
Vent
Diverter
Drain Manhole
Electric Manhole
Floor Drain
Hydrant
Light
Manhole
Outfall
Pole
Valve
Other or Unknown
Overhead Electric Line
Acid or Active Waste Water Drain
Former Acid Drain
Natural Gas
Cooling Water
Potable Water Supply/Fire
Former Fire
Sanitary
Parking Drain
Lines Drain to Cooling Water Pond
Former Storm Drain
Electric Ground Surface/Conduit
Approximate Site Boundary
EPAM/High Volume Sampler
Weather Station
Trailer
Water Treatment Shed
Buildings
Septic System
Water Feature

Spatial Projection:
Coordinate System:
MA State Plane Mainland
FIPS Zone: 2001
Units: US Survey Feet
Datum: NAD83

Plot Info:
File: Fig14-1_Uilities.mxd
Project No.: 3215
Plot Date: 2 August, 2016
Arc Operator: EI
Reviewed by: HG