ARCADIS
Infrastructure, environment, buildings

AIR MONITORING PROGRAM
ENCYCLE DEMOLITION PROJECT
5500 UP RIVER ROAD
CORPUS CHRISTI, TEXAS

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TO: Mike Boudloche, Trustee

FROM: Kenneth Brandner, P.E., P.G.

DATE: October 18, 2010

SUBJECT: Air Monitoring Program - Building and Smokestack Demolition at the former Encycle/Texas Inc. facility, 5500 Up River Road, Corpus Christi, Texas.

Date
October 18, 2010

Contact:
Kenneth Brandner

Phone:
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The air monitoring program during building and smokestack demolition activities at the former Encycle/Texas, Inc. facility at 5500 Up River Road in Corpus Christi, Texas will include the following:

1. Real-Time Particulate Air Monitoring

As detailed in Exhibit A of the Master Services Agreement between Energy Renewal Partners, LLC and Mike Boudloche, the demolition contractor shall undertake adequate measures to control dust during demolition activities. These dust control measures shall include water spraying/misting to control dust during demolition activities, and no wrecking balls or explosives shall be permitted to demolish any portion of the buildings, smokestack, or structures to be demolished. During demolition activities, the demolition contractor shall conduct real-time particulate air monitoring around the perimeter of the site. The particulate air monitoring shall be conducted using a Miniram Model PDM-3 portable dust/particulate monitor, or equal. The dust/particulate monitor shall be capable of measuring dust/particulate concentrations as low as 0.1 milligrams per cubic meter, which is several orders of magnitude lower than the Occupational Safety and Health Administration (OSHA) permissible exposure level (PEL) of 10 milligrams per cubic meter of silica/quartz dust as shown on Table 1. The particulate air monitoring shall be conducted by the demolition contractor at least four times daily, at approximate 2 hour intervals, during each day of asbestos abatement, hazardous waste removal, and building demolition activities. If the particulate air monitoring measurements at the property boundary show that particulate/dust concentrations downwind of the demolition area are higher than the range of upwind concentrations, the demolition contractor shall implement

additional dust control activities to reduce particulate/dust concentrations until downwind concentrations are reduced to levels within the range of upwind concentrations.

Also, the demolition contractor shall install 10-foot-high Tarps Plus Model TP-BMT1030-1 heavy duty black polyethylene mesh tarps, or approved equal, on the southern side of the buildings and smokestack undergoing active asbestos abatement, hazardous waste removal, and building demolition activities. The tarps shall be positioned in an east-west direction, parallel to Up River Road, as close to the buildings as possible without impeding the safe movement of Contractor's personnel and equipment. The tarps shall extend a minimum of twenty feet beyond the western and eastern ends of the building (i.e., the tarp length shall be at least 40 feet greater than the east-west length of the building). The tarps can be removed by the demolition contractor when active asbestos abatement, hazardous waste removal, and demolition activities for that building have ceased.

In addition, the wind direction and wind speed shall be recorded by the demolition contractor prior to start of work each day and on intervals not to exceed 4 hours each day during active asbestos abatement, hazardous waste removal, and building and structure demolition activities. If the wind direction has a northerly component (i.e., if the wind direction is from the Encycle facility toward Up River Road) and if the sustained wind speed (the wind speed obtained by averaging the observed values over a one minute period) exceeds 15 miles per hour, all building and structure demolition work shall cease until the sustained wind speed declines to 15 miles per hour or lower; or the wind direction shifts such that the wind direction does not have a northerly component (i.e., the wind direction is from Up River Road toward the Encycle facility). The demolition contractor can conduct non-dust producing activities (equipment maintenance, etc.) during these periods.

2. Perimeter Air Sample Collection for Laboratory Analyses

Air samples will be collected from the perimeter of the facility for laboratory analyses during building demolition activities. The air samples will be collected by the Trustee's designated representative near the property boundary upwind and downwind of the facility prior to initiation of demolition activities, and at least twice monthly during active demolition activities.

The air samples will be collected using a Gilian Model GilAir5 air sampling pump, or equal. The air samples will be collected by attaching laboratory-provided air sample filter cartridges to the pump, and setting the air sample filter cartridges approximately five feet above ground level upwind and downwind of active building demolition areas. The air sample pumps will be set at a flow rate of approximately 3 liters per minute for a period of approximately 100 minutes,

thereby resulting in an air sample volume of approximately 300 liters per air sample. The air sample cartridges will then be securely capped, labeled, and delivered to TestAmerica laboratories for analyses of the following metals:

- Antimony
- Arsenic
- Barium
- Cadmium
- Chromium
- Copper
- Lead
- Mercury
- Nickel
- Selenium
- Silver
- Zinc

Laboratory test methods and detection limits are shown on Table 1. If the laboratory results show that metals concentrations exceed the OSHA PELs and upwind concentrations, the demolition contractor shall implement additional dust control activities to reduce metals concentrations until downwind concentrations are reduced to levels below the OSHA PELs.

3. Air Monitoring during Asbestos Abatement Activities

As detailed in Exhibit A of the Master Services Agreement between Energy Renewal Partners, LLC and Mike Boudloche, the demolition contractor work requirements shall involve removal of the asbestos-containing materials (ACM) in the buildings and structures to be demolished by EPA-accredited asbestos abatement workers with a minimum of one on-site EPA-accredited asbestos project manager/supervisor during asbestos abatement activities.
The ACM shall be removed in accordance with applicable federal, state, and local regulations, including applicable EPA regulations given in the National Emission Standards for Hazardous Air Pollutants (NESHAPS) (40 CFR Part 61); applicable EPA regulations given in the Asbestos Hazard Emergency Response Act (AHERA) (40 CFR Part 763); applicable OSHA Regulations given in 29 CFR Parts 1910 and 1926; and applicable Texas Department of State Health Services regulations given in the Texas Asbestos Health Protection Rules (TAHPR).

The demolition contractor shall be responsible for personal air monitoring, perimeter air monitoring and post-abatement clearance monitoring as required by applicable Laws and Regulations. If during ACM removal activities, asbestos air quality regulatory levels are exceeded, the demolition contractor shall notify the Trustee and take appropriate measures to reduce the concentration of airborne asbestos (e.g., wetting) below applicable air quality regulatory levels. The demolition contractor shall be responsible for achieving post-abatement asbestos air monitoring clearance criteria. Should the work area fail to achieve the asbestos air quality regulatory level for clearance monitoring, the demolition contractor (or its Subcontractor) shall repeatedly clean the work area until the clearance is achieved.

The demolition contractor shall be responsible for proper storage, loading, rigging, transportation and disposition of all friable and non-friable asbestos-containing waste generated during implementation of the building, smokestack, and structure demolition project. The ACM shall be transported to landfill(s) authorized to accept asbestos wastes.

Sincerely,

ARCADIS U.S., Inc

Kenneth J. Brandner, P.E., P.G.
Geological Engineer

Table 1. Air Monitoring Parameters, Encycle Demolition Project, 5500 Up River Road, Corpus Christi, Texas

Parameter	OSHA PEL (8 hour TWA)	Test Method	Method Detection Limit	Sample Collection Frequency
Asbestos[a]	0.1 f/cc	PCM NIOSH 7400	≤0.05 f/cc	During asbestos abatement activities, including each day of building interior clearance air monitoring.
Dust/Particulates[b] (silica/quartz dust)	10 mg/m^3	Field Measurement (Miniram Model PDM-3, or equal)	0.1 mg/m^3	At least four times daily upwind and downwind during demolition.
Antimony[b]	0.5 mg/m^3	NIOSH 7300	0.021	At least twice monthly upwind and downwind during demolition.
Arsenic[c]	0.01 mg/m^3	NIOSH 7300	0.01	At least twice monthly upwind and downwind during demolition.
Barium[b]	0.5 mg/m^3	NIOSH 7300	0.0042	At least twice monthly upwind and downwind during demolition.
Cadmium[d]	0.005 mg/m^3	NIOSH 7300	0.00021	At least twice monthly upwind and downwind during demolition.
Chromium[b]	1 mg/m^3	NIOSH 7300	0.021	At least twice monthly upwind and downwind during demolition.
Copper[b]	1 mg/m^3	NIOSH 7300	0.0042	At least twice monthly upwind and downwind during demolition.
Lead[e]	0.05 mg/m^3	NIOSH 7300	0.0042	At least twice monthly upwind and downwind during demolition.
Mercury	0.05 mg/m^3	NIOSH 6009	0.00042	At least twice monthly upwind and downwind during demolition.
Nickel[b]	1 mg/m^3	NIOSH 7300	0.0042	At least twice monthly upwind and downwind during demolition.
Selenium[b]	0.2 mg/m^3	NIOSH 7300	0.021	At least twice monthly upwind and downwind during demolition.
Silver[b]	0.01 mg/m^3	NIOSH 7300	0.0021	At least twice monthly upwind and downwind during demolition.
Zinc[b]	15 mg/m^3	NIOSH 7300	0.021	At least twice monthly upwind and downwind during demolition.

f/cc	Fibers per cubic centimeter
mg/m^3	Milligrams per cubic meter.
PEL	Permissible exposure limit
TWA	Time-weighted average
a	29 CFR 1910.1001(c)
b	29 CFR 1910.1000
c	29 CFR 1910.1018
d	29 CFR 1910.1027
e	29 CFR 1910.1025