



March 17, 2014

Mr. Michael MacCabe
New York State Department of Environmental Conservation
Division of Environmental Remediation, 12th Floor
625 Broadway
Albany, New York 12233

RE: Interim Remedial Measures Work Plan Relative to Site Demolition Activities at Capital Center Site (Site No. C401070) – Albany, NY

Dear Mr. MacCabe:

As the first step in the Remedial Investigation (RI) of the Capital Center Site (Site No. C401070), demolition of the existing buildings will be undertaken as an interim remedial measure (IRM) to clear the way for the investigation activities. The first step of the IRM will be to complete Pre-Demolition Asbestos-Containing Material (ACM) surveys of all buildings located on the Site. The next step would be to develop abatement design documents so that asbestos-containing material can be removed from the building and, lastly, following asbestos removal, the demolition of the subject buildings will be undertaken. Once the abatement and demolition are complete, this will allow for the completion of the RI tasks as set forth in the RIWP. The IRM activities associated with the asbestos survey, abatement design, and building demolition are described in the following sections of this IRM Work Plan.

Pre-Demolition Asbestos-Containing Materials (ACM) Survey

CHA will complete pre-demolition asbestos-containing material surveys of the six buildings located at Capital Center Site. New York State Department of Labor (NYSDOL) -certified inspectors will identify and assess the condition, location(s) and quantity of suspect asbestos-containing materials throughout the subject buildings.

The inspectors will record and collect bulk samples of identified suspect asbestos-containing materials during the survey following the protocols referenced in 40 CFR Part 763.86 Subpart E (ASHERA) and following NYS Department of Health (DOH) analysis requirements. Upon completion of the survey fieldwork and receipt of all asbestos laboratory reports, CHA will prepare a Pre-Demolition Asbestos Survey Report that will include a summary of findings, sample location plans, confirmed asbestos material quantities, and analytical reports for all subject buildings at the Capital Center Project Site. All fieldwork and sample analysis will comply with applicable federal and state regulations.

Asbestos Abatement Design

CHA will prepare asbestos abatement design documents. The abatement design will be performed by a NYSDOL-certified asbestos project designer. CHA will compile an asbestos technical specification, abatement plans outlining the scope of work. As necessary, site-specific variance petitions will be prepared for approval by the NYSDOL.

Asbestos Abatement Activities and Building Demolition

All confirmed asbestos-containing materials will be removed by a licensed asbestos abatement contractor according to the abatement design documents prepared by CHA and in accordance with all federal, state, and local regulations. During the removals, a NYSDOL asbestos project monitor will be hired to confirm that all removals are completed in accordance with appropriate regulations and will also be responsible for performing all area air monitoring as required by NYSDOL and Industrial Code Rule 56. Upon completion of asbestos removals, the subject buildings will be demolished. All demolition activities will be undertaken and completed in strict accordance with applicable federal, state, and local regulations and ordinances.

Through the successful completion of the tasks outlined above, the site will be fully accessible to complete the RI tasks outlined in the RIWP. Deliverables documenting the activities outlined above will include:

- Pre-Demolition Asbestos Survey Report
- Asbestos Abatement Design Package/Bid Package
- Asbestos Abatement Closeout Report

These deliverables will be provided to the NYSDEC during the course of the IRM.

If you have any questions, please do not hesitate to contact me at (518) 453-2899. Please provide any comments you may have and/or your approval of this Work Plan at your earliest convenience so that we may begin the work associated with the IRM.

Sincerely,



Keith E. Cowan, C.P.G.
Market Segment Director – Environmental
Vice President

JM/sf/sb

CC: Christopher Bette, P.E. – First Columbia, LLC
Dean Sommer – Young, Sommer LLC
Sarah Benson – CHA
Mark Sergott – NYSDOH

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