FITERMAN HALL – 30 WEST BROADWAY, NEW YORK, NY
SCAFFOLD WORK PLAN AMENDMENT FORM

DATE FORM SUBMITTED: 06/01/2007


AMENDMENT #1

Date Implemented: May 2007

As described in the attached NYS DOL approved amended procedure, air sampling for the final two pilot program tents will be conducted only during the removal of ACM spandrel mastic and not during the brick and mortar removal. In addition, background clearance testing will not be required after the brick and mortar removal.

Reason for Amendment:

Analysis of several of the air samples taken during the Pilot Program by AHERA TEM methodology could not be carried out due to overloading of brick and mortar dust from the façade pocketing. Based on discussion with the Regulators it was decided to amend the procedure to focus on the impact of the ACM spandrel mastic removal to airborne fiber counts.

Sections of SEO Work Plan Affected:

Section 6.4.
Attachment II – NYS DOL Variance Petition

AMENDMENT #2

Date Implemented: June 2007

Allow attachment of scaffold tie-ins to exposed concrete slabs in the gash area via expansion anchors per the attached procedure.

Reason for Amendment:

There are limited cases of structurally compromised spandrel beam in the gash area where the building was structurally damaged. These spandrel beams are unacceptable for use as support for the scaffold. In these cases, the engineer has proposed the use of scaffold attachments to the exposed slab, through the use of an expansion anchor.

Sections of SEO Work Plan Affected:

Section 6.1; Section 6.8
AMENDMENT #3

Date Implemented:  June 2007

As originally described in Section 6.4 of the Scaffold Erection Operation Work Plan document, pilot program brick and mortar waste characterization testing will be re-collected from each side of the building so as to discern the waste characteristics of each separate façade. Brick and mortar waste will be retained on-site until a decision on how to dispose is reached, based on the new round of sampling results.

Reason for Amendment:

Original sampling was conducted incorrectly in that recovered brick and mortar from each façade of the building was then included in a single composite sample that was submitted to the laboratory for analysis. This prevented specific conclusions to be made regarding the waste characteristics of the brick and mortar from each separate façade of the building. Subsequent sampling will be performed according to the SEOWP, which will result in four separate samples being analyzed by the lab, which will then provide four separate result reports for our review.

Sections of SEO Work Plan Affected:

Section 6.4.

AMENDMENT #4

Date Implemented:  June 2007

NYC DEP & NYS DOL licensed asbestos handlers will perform brick pocketing and spandrel mastic abatement work required prior to scaffold attachment to spandrel beam. NYC DEP & NYS DOL licensed asbestos handlers will perform slab cleaning required supporting the gash area expansion anchor scaffold attachment procedure. Work by certified personnel and work by uncertified scaffold installation personnel will not be conducted on the same façade of the building at the same time. In addition to working on separate façades, a twenty five foot (25’) buffer zone will be maintained between the certified-worker restricted work areas and the un-certified-worker work areas. Un-certified workers will follow behind and perform the actual scaffold tie-in. This separation of trades will be defined by asbestos “caution” tape at the edge of the restricted work area, and another strip of asbestos “caution” tape maintained at the 25’ buffer line demarcating, respectively, the abatement work area and the buffer zone.

This buffer zone will be adhered to for both gash (expansion anchor) and non-gash (spandrel beam) tie-in connection methods.

Reason for Amendment:

This amendment is being provided in response to a request from the Regulators for clarification on the procedure for separation of certified asbestos workers and un-certified scaffold workers. On approval, the above information will be added to the Scaffold Erection Operation Work Plan document.

Sections of SEO Work Plan Affected:

Sections 6.6, 6.7, 6.8 & 6.9.
PAL ENVIRONMENTAL SAFETY CORP.
Environmental Contracting Specialists

Date: May 10, 2007

Mr. Christopher G. Alonge, P.E.
Associate Safety and Health Engineer
New York State Department of Labor
W. Averell Harriman State Office Campus, Bldg. 12, Room 154
Albany, NY 12240

Re: Request to Re-Open
Variance No. 06-0852
Fiterman Hall - 30 West Broadway, New York, NY

Dear Mr. Alonge:

In order to supplement the Pilot Program operations during the Scaffold Erection Operation (SEO), PAL requests approval to utilize the procedure outlined below. This procedure is designed to allow for Pilot Program air sampling to be focused to detect for the presence of ACM fibers without being overloaded by debris from exterior brick and mortar, material known and documented in previous Pilot Program operations to be non-asbestos containing or impacted.

Supplemental Pilot Program Procedures

- Supplemental pilot program procedures will be performed in existing tent enclosures on the east and west sides of the Building by NYC DEP and NYS DOL licensed asbestos handlers utilizing proper PPE.
- The removal of a section of brick and mortar will be performed from inside each tent enclosure to expose the spandrel beam locations that are affected by asbestos material. Brick and mortar will be removed utilizing mechanical chipping hammers or manual hammers and chisels. During brick and mortar removal, negative pressure equipment will not be operated and air sampling will not be conducted inside the tent enclosures.
- Upon completion of the brick and mortar removal, the Owner's Environmental Consultant will perform a visual inspection of the opening to determine if any suspect dust or debris is present within the opening. Should dust or debris be found in either supplemental Pilot Program location, the protocol outlined in Variance No. 06-0852 will be implemented. If no dust or debris is detected, the Supplemental Pilot Program will proceed.
- Upon the completion of brick and mortar removal PAL workers will clean the interior of the tent enclosures by HEPA vacuuming and wet wiping.
- After cleaning of the tent enclosures is completed a critical barrier will be installed over each opening to allow the Owner's Environmental Consultant to perform TEM background air sampling within the tent enclosures. No further work will be performed within these tent enclosures until sampling results are received.
- After background sampling results are received, the removal of asbestos mastic from the spandrel beam will proceed within each tent enclosure. Negative pressure will not be established during the removal of mastic from the spandrel since the purpose of the Supplemental Pilot Program is to determine if mastic removal operations will release...
asbestos fibers into the surrounding environment. The Owner’s Environmental Consultant will conduct during abatement TEM air sampling inside and outside of each tent enclosure (two samples in, two samples out per enclosure). Asbestos mastic material will be wetted down with amended water via pump sprayers prior to removal. Once the mastic has been sufficiently wetted down, NYC DEP and NYS DOL licensed asbestos handlers will then utilize manual scraping tools to remove a plus or minus eight inch by eight inch (± 8” x 8”) spot of mastic from the spandrel beam.

- Following the removal of mastic, the exposed steel surface of the spandrel beam will be cleaned by HEPA vacuuming and wet wiping.
- Upon completion of the abatement and cleaning, and once sufficient volume of air has been collected, the TEM air sampling runs will be terminated. The samples will then be sent to the laboratory for analysis. If sample results are above seventy structures per millimeter squared (70 s/mm²), the tents will be re-cleaned and a new set of TEM samples will be run again until successful clearance is met.
- The cleaned steel spandrel surface will then be encapsulated.
- Tents will only be broken down if all sample results are less than 70 s/mm².

Should TEM results indicate that mastic removal operations did not generate asbestos contamination, then PAL will proceed with the removal at all tie-in locations for the entire Building without tent enclosures.

If you have any questions or require further information regarding this procedure, please contact our office.

Sincerely,
PAL Environmental Safety Corp.

Aric Dominguez
Compliance Manager
NYS Project Designer (Certification No. 07-02183)

APPROVED
MAY 11 2007

New York State Dept. of Labor Engineering Services Unit
During the course of on site engineering review of the scaffolding installation, it has been discovered that the spandrel beam on some levels in the South Side Gash Area have been compromised due to the impact received by the Building. Compromised spandrel may not be capable of handling loads imposed by the scaffolding. It is necessary to provide a contingency attachment procedure for these compromised areas. The following procedures are to be appended to the Regulatory Submittal Part I (S) – Scaffold Erection Operation Work Plan at the end of the each section indicated below.

SECTION 6.1 – SCAFFOLD TIE-METHODOLOGY – GASH AREA

On some levels of the South Side Gash Area where damage has been sustained by the structure the integrity of sections of spandrel beams have been compromised. These compromised spandrel beams may not be capable of supporting loads imposed by the scaffolding system. In locations where the spandrel beam has been compromised the following attachment procedure will be utilized.

- Attachment in damage areas will be made to an intact section of the concrete slab where engineering evaluation has determined the structure is capable of sustaining scaffolding and all related loads (ie. wind load).
- This attachment will replace the spandrel beam attachment. Attachment to compromised spandrel beams will not be attempted.
- Where required, concrete slab scaffold tie-ins will be made approximately two to four feet into the Gash from the edge of the damaged slab. Exact slab connection locations will be determined by the engineer of record for the scaffolding location.
- It will not be necessary to access the interior of the Building to make slab connections.
- Prior to making an attachment to the scaffolding slab a 1foot by 1foot area of exposed concrete slab surface will be HEPA vacuued and wet wiped by NYC DEP & NYS DOL licensed asbestos handlers in order to remove any residual dust or debris that may be present.
- Laborers will utilize an electric drill equipped with a masonry bit to create a 5/8 inch housing in the cleaned surface of exposed concrete slab at the connection location determined by the engineer of record for the scaffolding installation.
- An angle iron scaffolding connector will be aligned with the connection housing.
- The angle iron connector will be attached to the slab with a 5/8 inch expansion bolt. The expansion bolt will be hammered into the drilled out housing location utilizing a handheld hammer or mallet. Once in place the bolt will be manually tightened with wrenches to activate expansion mechanism and secure the angle iron connector to the slab.
- The secured angle iron will be attached to the scaffolding system via a pipe scaffolding clamp and secured in place.
SECTION 6.8 – SCAFFOLDING INSTALLATION
(FLOORS: TWO THROUGH FIFTEEN)

In areas of the Gash where the spandrel beam is compromised, the contingency scaffolding attachment to the slab will be made in accordance with the procedure outlined in Section 6.1.