



**NON-TRADITIONAL WORK PLAN
SOUTH BOSTON POWER PLANT
776 SUMMER STREET
BOSTON, MASSACHUSETTS 02127**



Prepared For:

NorthStar Contracting Group, Inc.
Mr. Craig Pearson
Director of Operations
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Everett, MA 02149

HRP 776 Summer Street, LLC.
776 Summer Street
Boston, MA 02127

Hillmann Project Number: M3-11785

November 8, 2021
Revised December 23, 2021
Revision 2 January 19, 2022
Revision 3 January 31, 2022

Certification of Work Plan

This work plan has been prepared for use by NorthStar Contracting Group, Inc. (NorthStar) for multiple decontamination and abatement tasks which are considered non-traditional across the site located at 776 Summer Street, Boston, MA. Hillmann shall not be held responsible or liable for the execution of this work plan. Execution of this work plan shall be the responsibility of HRP 776 Summer Street, LLC., Suffolk Construction, NorthStar Contracting Group, and TRC Corporation.

Prepared By:



Jonathan Nicoll
Asbestos Designer AD900372

Introduction

On behalf of HRP 776 Summer Street. LLC. (the “Owner”), Mr. Jonathan Nicoll is submitting the following Non-Traditional Asbestos Abatement Work Plan (“NTWP” or “work plan”) pursuant to 310 CMR 7.15(14) for review and approval for the planned demolition and abatement at the former South Boston Power Plant. The NTWP is being submitted for the removal of gaskets, roofing, caulking, flooring, and wire wrap as well as decontamination of select areas that may have been contaminated by friable asbestos containing materials (ACM) across the site. NorthStar is preparing to commence an asbestos abatement program utilizing a combination of traditional and non-traditional methods for the cleanup and removal of ACM on the interior and exterior of select buildings.

Although this NTWP is intended to address initial phases of the project, we anticipate an additional amendment to the NTWP that will incorporate the remaining buildings. The buildings to be included in the future amendment are identified as building 4, boiler house # 3, buildings 1B & 1C, switch houses # 2, 3, & 4 and buildings 2A-C. NorthStar will submit this amendment two weeks after the approval of this original plan.

The non-traditional work practices described herein will not result in the discharge of visible emissions of asbestos to the outside air, will keep ACM adequately wet, comply with all other applicable requirements of 310 CMR 7.15, will not pose significant risk to public health, safety, or the environment, and is otherwise consistent with the requirements of applicable federal, state, and local laws and regulations.

This portion of the project is considered non-traditional because work activities are not considered standard practice in compliance with the following regulations:

- ❖ 310 CMR 7.15(7)(c)(5)(6)
- ❖ 310 CMR 7.15(7)(e)
- ❖ 310 CMR 7.15(14)(4)(b)

This NTWP will address the removal and disposal of the following identified ACM:

Location	Scope
Bldg. C Switch House Front Office Area, Bldg. 4 Ground Level East and West, Bldg. 4 Stair 4 up to Elevation 127', Bldg. 3 Security Office Area, and Bldg. 1E Switch House #5	Decontaminate ~46,000 SF of assumed contaminated surfaces
Bldg. 3 and Bldg. 1F Screen House	Remove ~8,100 SF Roofing
Bldg. 3 and Bldg. 4	Remove ~10,000 LF of Black Caulking associated with Exterior Metal Siding on Lower Section
Bldg. 3 Security Office	Remove ~200 SF Sheet Flooring and ~100 LF Interior Door Caulking
Bldg. 3 2 nd Floor Bathroom	Remove ~200 SF Ceramic Tile Mortar
Sidewalk Adjacent to Switch House 5	Remove ~20 LF Caulking
Bldgs. 1D – 7 and 8 Pump House's	Remove ~200 PACM Gaskets
All Buildings	Remove ~6,000 PACM Gaskets

- Additionally, all other ACM's within the above mentioned areas identified in TRC's Limited Asbestos Survey Report dated March 2, 2021 will be removed via traditional methods
- NorthStar will be responsible for providing progress updates to MassDEP weekly.
- *Note* Basements have been previously surveyed by TRC with exception to the Turbine Hall water intake and outtake channels and the Boiler House which is partially underwater. Water is considered ACM contaminated and will be surveyed after the areas have been de-watered as part of a future phase. The entire area is considered asbestos contaminated and will be cleaned as part of the asbestos removal. The Turbine Hall water intake and outtake channels will be inspected by TRC once they have been sealed and prior to any future demo which would disturb any suspect ACM in those areas. There will be no dewatering conducted during this phase of the NTWP.

NorthStar, 401-S 2nd Street, Everett, MA (License AC000097), has been contracted by the General Contractor and will provide trained asbestos workers and supervisors for all tasks described in this NTWP. The work described herein will not proceed prior approval of the Massachusetts Department of Environmental Protection (MassDEP) including the issuance of a Waiver Number, Plan Approval Number and authorization to proceed by the Owner.

Site Specific Removal Plan

The following sections describe the work area isolation methods, worker protection, decontamination, packaging, and transportation procedures NorthStar will employ while implementing the Approved Plan.

Pre-Abatement and General Work Practices - Decontamination and Interior Abatement

1. Prior to commencement of any activity, each identified work area shall be isolated in accordance with the requirements of 310 CMR 7.15(7)(c)(4) to prevent emissions to the ambient air. The work area shall be isolated by sealing all openings, including but not limited to, windows, doors, cracks, vents, conduits, ventilation openings, drains, grills, and trench grates with six mil thick plastic sheeting and secured by zip tape and duct tape. Walls, floors, and ceilings will not be covered as they are considered contaminated and will be part of the decontamination.
2. Where applicable, Life Safety work will be performed prior to any abatement or decontamination. This will primarily include the installation of temporary lighting.
3. A three-stage decontamination facility will be erected at the entrance to each work area to facilitate the decontamination. Asbestos warning signs shall be posted at all potential entry points.
4. Decontamination unit wastewater associated with the work described in this NTWP shall be filtered through a 5-micron filter and be disposed as ACWM.
5. HEPA-filtered fan units shall be used to supply negative pressure which will be exhausted outside the containment. A minimum of four (4) air changes per hour will be provided. Negative pressure shall be maintained continuously throughout the abatement process until the final visual and clearance testing is complete. Negative air calculations including volume of area to be abated, capacity of unit running at 75% efficiency with 4 air changes per hour will be monitored and recorded.

- a. The Building 4 chimney will not be used for exhausting from the work area. All venting during this phase of the NTWP will be through windows to the exterior.
6. All personnel will have the proper asbestos training, medical clearance, and licensing, and don the proper personal protective equipment (PPE). Required PPE for this project will include Tyvek (or equivalent brand) suits, half-face air-purifying respirators, hard hats, safety glasses, gloves, high visibility vests, and safety-toe boots. Workers shall enter / exit the work area through the worker decontamination facility.
7. Employees will have on site a copy of their asbestos training certifications, medical clearance records, respiratory fit-tests, and current MA asbestos license.
8. Personal OSHA Air Monitoring shall be conducted during this operation by NorthStar.
9. Water hoses will be utilized and sourced from hydrants located on the east side of the site. Water shall be used to wet the ACM and control dust during all abatement operations.
10. The General Contractor has procured a temporary electrical service through Eversource and an on-site electrical contractor, the work has commenced and the temporary service will be installed and operating prior to the Start of the Abatement.
11. After completion of the abatement and decontamination activities, all equipment, supplies, and materials shall be removed from the work area once they have been thoroughly cleaned and are free of asbestos debris.
12. Barriers and seals established as needed for each of the abatement work areas inside of the building will remain in place if the area that is sealed off has not been cleaned/abated yet, or if the area will be re-contained for abatement as part of a later phase.

Negative Pressure Enclosure Systems

All negative pressure enclosure systems will comply with 29 CFR 1926.1101, 310 CMR 7.15U and 454 CMR 28.00. To determine the number of AFD's required, NorthStar will ascertain the volume, in cubic feet, of the work area by multiplying the floor area by the ceiling height. The total air circulation requirement for the work area, in cubic feet per minute (CFM), will then be determined by dividing the above volume by the number fifteen (15), which is 4 changes per hour. Negative air calculations including volume of area to be abated, capacity of unit running at 75% efficiency with 4 air changes per hour will be monitored and recorded.

$$\frac{\text{Volume of work area (cu. Ft.)}}{15} = \text{Air Circulation Requirement (CFM)}$$

The number of Air Filtering Devices needed to achieve this rate will then be determined by dividing the air circulation requirement (CFM) by the working capacity of the AFD(s) used.

$$\frac{\text{Air Circulation Requirement (CFM)}}{\text{Capacity of AFD with loaded filters (CFM)}} = \text{Number of AFD's needed}$$

At a minimum, one (1) additional AFD will be setup as a backup in case of equipment failure or if a machine needs to be maintenance.

BUILDING	FLOOR	LENGTH	WIDTH	HEIGHT	Work Area Volume (CF)	Air Changes per hour	CF/ HR	CF/MIN	HEPA CFM at 75%	# of 2000 cfm HEPA units
BUILDING 1C - Switch House 2&3										
Front Office Area	ground level	30	30	12	10,800	4	43,200	720	1500	1
Front Office Area	level 2	30	30	12	10,800	4	43,200	720	1500	1
Front Office Area	level 3	30	30	12	10,800	4	43,200	720	1500	1
BUILDINGS 1D - Pump Houses										
Pump House 7	ground level	40	22	15	13,200	4	52,800	880	1500	1
Pump House 8	ground level	40	22	15	13,200	4	52,800	880	1500	1
BUILDING 1E - Switch House 5										
Throughout	ground level	130	20	15	39,000	4	156,000	2,600	1500	2
BUILDING 3 - Boiler Building 1&2										
Security office	lower level	20	20	15	6,000	4	24,000	400	1500	1
Bathroom	level 2	20	20	15	6,000	4	24,000	400	1500	1
BUILDING 4 - Boiler Building 3										
Southwest stairwell	level 2 to roof	20	12	100	24,000	4	96,000	1,600	1500	1
Ground Floor - West	lower level	220	125	15	412,500	4	1,650,000	27,500	1500	18
Ground Floor - East	lower level	220	30	15	99,000	4	396,000	6,600	1500	4
Tank Room - West	level 2	150	25	40	150,000	4	600,000	10,000	1500	7

*** NorthStar's Supervisor will inspect all HEPA machines every two (2) hours daily. Copy's of HEPA inspection logs will be submitted to MassDEP daily.**

Pre-Abatement and General Work Practices - Roofing, Caulking, and Gaskets

1. A regulated area shall be established around the portion of the area being worked on utilizing asbestos barrier tape and asbestos warning signs. This barrier tape will be located at ground level and around the waste trailers.
2. A three-stage decontamination facility will be erected and contiguous to any regulated work area. The decontamination facility will consist of two separate, adjacent rooms separated by a shower with curtained entrances, constructed in accordance with applicable regulations (water collection, heating, and filtration).
3. All personnel will have the proper asbestos training, medical clearance, and licensing, and don

the proper personal protective equipment (PPE). Required PPE for this project will include Tyvek (or equivalent brand) suits, half-face air-purifying respirators, hard hats, safety glasses, gloved, high visibility vests, and safety-toe boots. Workers shall enter the work area through the worker decontamination facility.

4. Employees will have on site a copy of their asbestos training certifications, medical clearance records, respiratory fit-tests, and current MA asbestos license.

5. Personal OSHA Air Monitoring shall be conducted during this operation by NorthStar.

6. Water hose shall be used to wet the ACM and control dust during all removal, breaking, and loading operations. Water will be sourced from local hydrants on the site. At least one hose will be used on each active work area to prevent any visual dust generated by abatement activity. Hose nozzles will be adjusted so that a mist of water is generated, as opposed to a stream. All water will be contained during wetting or decontamination activities. Wastewater will not be discharged into a sanitary sewer. All water generated during abatement will be passed through a 5 micron filter before being ultimately disposed as ACWM.

- a. In the event of freezing weather conditions, NorthStar will implement heat trace lines coming from the water source. Heat will also be provided into the containments from outside of the work areas. If needed, environmentally friendly RV antifreeze will be added to the water.

7. After completion, all equipment, supplies, and materials shall be removed from the work area once they have been thoroughly cleaned and are free of asbestos debris.

8. During all exterior ACM removal, a MA DLS certified Asbestos Project Monitor from TRC shall be on-site to perform daily ambient air monitoring along the work area boundaries at four locations, preferably near active the work area(s). The sample locations will preferably be along the perimeter of the site and may change each day based on where the majority of active work area(s) happen to be. Two sets of air samples will be collected per shift and analyzed daily using high volume pumps. Ambient air monitoring will be performed by TRC following the NIOSH 7400 PCM Method. Analysis of the air samples shall be on site so that corrections in the work practices can be made immediately if warranted. In addition to the perimeter monitoring noted above, similar ambient air sampling (4 locations, two sets of air samples each shift) will be performed around each active exterior work area. These sample locations may be adjusted during the work based on the existing conditions for each work area.

9. The Contractor will provide a sufficient number of GFCI protected electrical outlets and extension cords to allow the Asbestos Project Monitor to collect all required perimeter area air samples.

10. If the air monitoring results reach or exceed the MA DLS clean air criteria of 0.010 fibers per cubic centimeter (f/cc) of air, then all work shall be stopped. MassDEP shall be notified within 2 hours by TRC and the work methods shall be evaluated. Work will not proceed until MassDEP approves changes in work methods or approves restarting of the work if it is determined that no changes to work methods are needed.

11. All air samples shall be collected in the breathing zone, at a minimum of fifty-four inches (54") and a maximum of seventy-two inches (72") above the ground level. All air filter cassettes shall be changed periodically to prevent particulate overloading. Air monitoring series which repeatedly reveal samples that are overloaded with particulate and cannot be analyzed shall be in noncompliance.

12. TRC will conduct a visual inspection of each exterior work area for remaining visible debris to ensure that no remnant ACWM/debris remains. Each non-porous item will be visually inspected by TRC and removed from the work area for scrapping, recycling, disposal as C&D waste, or for re-use by Owner. The Contractor shall perform additional removal and decontamination as requested by TRC until the area and any items to be removed from the work area as non-ACWM have been approved.

13. MassDEP must be notified a minimum of 24 hours prior to the initiation of each phase (or work area) and a minimum of 24 hours prior to the completion of the work of each phase (or work area) to allow them the opportunity to conduct a post-inspection at the end of the project or phase.

14. At the end of each shift, a copy of all air samples will be emailed to MassDEP at nero.asbestos@state.ma.us.

Decontamination and associated Traditional Abatement – Bldg. 1C Switch House Office Area, Bldg. 4 Level 2 Tank Room, Bldg. 4 Ground Level East and West, Bldg. 4 Stair 4 up to 127' Elevation, Bldg. 3 Security, Bldg. 1E Switch House, Bldg. 7, and Bldg. 8

1. The work area demarcation, crew training, sampling, water use, and other steps included in the “Pre-Abatement and General Work Practices - Decontamination and Interior Abatement” section of this plan will all remain in place and be adjusted for this task.
2. Walls, floors, and ceilings will not be covered with poly sheeting as they are considered contaminated and will be included in the following decontamination procedures.
 - a. NorthStar will demolish an exterior wall in order to gain access to the Bldg. 4 Southwest Corner stairwell. ***The large opening created during demo shall be first sealed with solid construction materials, such as plywood over studding, which shall constitute the outermost boundary of the asbestos work area. All cracks, seams and openings in such solid construction materials shall be caulked or otherwise sealed, so as to prevent the movement of asbestos fibers out of the work area.*** The stairwell will be precleaned and a containment with 4 layers of poly sheeting will be erected encompassing the entire stairwell from the ground level up to the roof. Floor grating at level 1 will be covered with rated lumber and 45 mil roofing membrane. Once the stairwell has been decontaminated, 2 layers of poly will be removed and disposed of as ACWM and the remaining 2 layers of poly will be reused as part of the containment for the remaining Bldg. 4 decontamination.
3. All debris in the containment area must be disposed of as ACM/ACWM. All ACWM generated from within the negative pressure containment shall be removed utilizing wet-methods and disposed of as asbestos waste. All waste shall be double-bagged in six-mil labeled polyethylene asbestos disposal bags or wrapped and sealed in double six-mil polyethylene sheeting or Gaylord boxes or equivalent and include a generator label.
4. All porous items (building materials, fiberglass insulation, etc.) inside of the containment are considered contaminated and will be disposed of as ACWM.
5. Non-porous contents will be wiped down and HEPA vacuumed and removed through the waste load out unit to be disposed of as clean demo debris. Alternatively, non-porous items that

cannot be feasibly cleaned will be disposed of as ACWM. Non-porous contents will be subject to visual inspection by the Asbestos Supervisor and Project Monitor prior to disposal.

6. Once steps 1-4 have been completed, NorthStar will proceed with traditional abatement of the following materials:
 - a. Bldg. 1C Switch House Office Area – Approx. 1,100 SF of ACM Floor Tile and Mastic
 - b. Bldg. 4 Level 2 Tank Room – Approx. 6,500 SF of ACM Tank Coating
 - c. Bldg. 4 Ground Level East and West – Approx. 420 CY of Commingled ACM Debris
 - d. Bldg. 3 Security – Approx. 200 SF of ACM Linoleum, 200 SF of ACM Ceramic Tile Grout and 100 LF of Interior Door Caulking
 - e. Bldg. 1E Switch House – Approx. 5,000 LF of ACM Wire Coating
 - f. Bldg. 7 and 8 Pump House's- Approx. 200 Gaskets
 - g. Throughout – Approx. 6000 Gaskets
7. Once step 5 has been completed, all surfaces within each full containment shall be thoroughly cleaned to achieve the clearance criteria of no visible debris, as determined by the Asbestos Supervisor and Project Monitor.
8. Bagged ACWM will be cleaned as they exit the decontamination unit. No visible dust or debris should be observed on the bags as they exit the decontamination unit. All ACWM will be transported to a fully enclosed and locked dumpster on site. Waste will be transported in accordance with the requirements found in 310 CMR 7.15(16).
9. MassDEP will be contacted at least 24 hours prior to removal of the full containment area or completion of the clean-up work to be provided the opportunity to conduct a final visual inspection of the asbestos abatement work. Surfaces will then be locked down with an approved encapsulant. Final clearance air samples will then be collected, analyzed and (upon passing) copies sent to MassDEP. After receiving approval from MassDEP, asbestos signs and the polyethylene ceiling may be removed. Upon approval of MassDEP, the containment structure will be dismantled. All polyethylene sheeting and any remaining debris shall be placed in six-mil asbestos waste bags (double-bagged) and disposed of as ACM waste.

Roof Abatement – Buildings 3 and 1E Screen House

1. The work area demarcation, crew training, sampling, water use, and other steps included in the "Pre-Abatement and General Work Practices – Roofing, Caulking, and Gaskets section of this plan will all remain in place and be adjusted for this task.
2. Asbestos roofing protocols will be implemented per 310 CMR 7.15 (10). Moveable objects will be removed, non-moveable objects will be covered, and the work area will be isolated. Critical barrier, minimum six-mil thickness plastic sheeting, will be installed for all openings in the regulated work area and adjacent spaces.
3. Asphaltic roofing materials shall be removed intact to the greatest extent feasible. Asphaltic roofing materials that are not intact or will be rendered non-intact shall be adequately wet during removal. NorthStar will primarily utilize hand scrapers, manual methods, and chemicals.

4. If cutting machines are to be used, they must be equipped with HEPA vacuums to capture dust produced by the cutting process. If HEPA vacuums cannot be used, work shall only proceed inside of a work area for which containment sufficient to prevent visible emissions of fugitive dust to the ambient air has been established.
5. Where cutting machines are used, NorthStar shall render the materials adequately wet throughout the process.
6. Intact asphaltic roofing shall be lowered to the ground prior to the end of each work shift. Non-intact asphaltic roofing shall be kept adequately always wet while on the roof. Intact and non-intact asphaltic roofing shall be placed in an impermeable gaylord waste bag or wrapped in plastic sheeting and lowered to the ground prior to the end of each shift. Bulk loading will not be allowed.
7. Once all asphaltic roofing has been removed, loaded out, and cleaned as described above, each area will be visually inspected in its entirety by the Project Monitor and the Asbestos Supervisor, and the MassDEP will be notified 24 hours in advance of the completion so they could inspect each area as well, if desired. If chemical methods are to be used, NorthStar will visually inspect the remaining concrete roof deck for staining prior to crushing or recycling.

Black Caulking Associated with *Metal* Exterior Siding- Buildings 3 and 4

1. The work area demarcation, crew training, sampling, water use, and other steps included in the "Pre-Abatement and General Work Practices – Roofing, Caulking, and Gaskets section of this plan will all remain in place and be adjusted for this task.
2. NorthStar will utilize long reach excavator (LRD), scaffolding, and man lifts for this task depending on access and safety concerns.
3. Removal protocols per 310 CMR 7.15(12) will be implemented. Moveable objects will be removed, non-moveable objects will be covered, and the work area will be isolated. Critical barriers, minimum six-mil thickness plastic sheeting, will be installed for all openings in the regulated work area and adjacent spaces.
4. Exterior metal siding panels will be removed intact, not broken, sanded, or drilled during removal or subsequent handling. Any breakage, sanding, sawing, or drilling will be performed in a negative pressure enclosure. Asbestos fiber releases to the outdoors will not be permitted.
5. Six-mil thickness plastic sheeting shall be spread on the ground under the areas where the exterior metal siding panels are being removed. Plastic sheeting shall extend away from the edge of the building and to either side of the work area a sufficient distance to catch any debris generated by the work operation. Plastic sheeting shall be cleaned of accumulated debris no later than the end of each work shift. For exterior metal siding that will be removed according to this method at significant elevations, the on-site project monitor will determine if the drop cloth under the work area is of sufficient size.
6. Fasteners securing exterior siding panels shall be unscrewed, cut, or pulled to allow intact panel removal. Exterior metal siding panels shall be removed whole and intact to the greatest extent

feasible. Methods likely to break panels shall not be used.

7. Each metal panel shall be adequately wetted with amended water prior to removal and during handling.
8. Panels shall be carefully lowered to the ground in a manner to avoid breakage.
9. Exterior metal siding panels will be wrapped and sealed in 2 layers of six mil thickness poly sheeting. Broken panels and debris will be placed in reinforced bags then sealed in six mil plastic labeled bags or gaylord boxes.
10. Once all exterior siding has been removed, loaded out, and cleaned as described above, each area will be visually inspected in its entirety by the Project Monitor and the Asbestos Supervisor, and the MassDEP will be notified 24 hours in advance of the completion so they could inspect each area as well, if desired.

Caulk Abatement – Sidewalk Outside Switch House

1. The work area demarcation, crew training, sampling, water use, and other steps included in the “Pre-Abatement and General Work Practices - Roofing, Caulking, and Gaskets section of this plan will all remain in place and be adjusted for this task.
2. Tarpaulin or plastic sheeting shall be spread on the ground adjacent to the caulking. Plastic sheeting shall extend away from the edge of either side of the work area a sufficient distance to catch any debris generated by the work operation. Tarpaulin or sheeting shall be cleaned of accumulated debris no later than the end of each work shift.
3. Asbestos containing caulking compounds shall be adequately wet with amended water prior to removal or repair. All pieces or particles of caulking compound shall be removed utilizing hand tools and a HEPA vacuum and/or using a wet wipe collection method.
4. The work area, including ground covers and equipment, shall be cleaned of visible debris at the end of each workday.
5. Once all caulking has been removed, loaded out, and cleaned as described above, each area will be visually inspected in its entirety by the Project Monitor and the Asbestos Supervisor, and the MassDEP will be notified 24 hours in advance of the completion so they could inspect each area as well, if desired.

Gasket Abatement – Throughout

1. The work area demarcation, crew training, sampling, water use, and other steps included in the “Pre-Abatement and General Work Practices - Roofing, Caulking, and Gaskets section of this plan will all remain in place and be adjusted for this task.
2. Flange gaskets and valve packings were assumed ACM during a previous survey of the facility.

3. NorthStar will identify PACM gaskets, each will be wetted then taped using zip wall black tape or similar between the flanges and spray-painted florescent orange or green for visible identification during deconstruction operations.
4. Once a gasket has been located, NorthStar shall shear, torch cut, manually, or mechanically remove from the existing system. Depending on size, torch cut pipes will be cut at least 4" away from the sealed gasket. Sheared pipes will be cut at least 12" away from the sealed gasket. The sealed component will be properly labeled and containerized as ACWM. Remaining non-ACM piping will be disposed of as clean demo debris.
5. The work area and equipment shall be cleaned of visible debris at the end of each workday.
6. Once all gaskets have been removed, loaded out, and cleaned as described above, each area will be visually inspected in its entirety by the TRC Project Monitor and the Asbestos Supervisor, and the MassDEP will be notified 24 hours in advance of the completion so they could inspect each area as well, if desired.

Waste Management, Hauler, and Disposal Facilities

All barrier tape may be disposed as solid waste in accordance with 310 CMR 19.000.

All disposable protective clothing shall be disposed as ACWM in accordance with 310 CMR 7.15(15) through (18).

Wetted ACM generated during all tasks shall be collected and sealed into a six-mil plastic bag that is placed in a leak-tight container for disposal as ACWM in accordance with 310 CMR 7.15(15)-(18).

All bags or wrapped materials transported out of the work area shall be labeled with preprinted labels required by Federal EPA, OSHA, and the Department of Transportation regulations. The name of the waste generator (HRP 776 Summer St. LLC) and the project location address shall also be placed on each bag.

Asbestos containing waste materials shall be loaded into lined trailers. Waste will be transported by Red Technologies, LLC. in Portland, CT and disposed of at Frank Road Portable Recycling Solutions in Grove City, OH. Alternatively, waste may be disposed of at the Minerva Landfill in Waynesburg, OH. All asbestos waste shall be hauled by a properly licensed hauler.

Copies of asbestos waste manifests will be sent to the MassDEP when ACM waste leaves the site. Failure to distribute waste manifests to MassDEP in the required period may result in work stoppages and potential revocation of this NTWP.

Ambient Environmental Monitoring

A MA DLS certified Asbestos Project Monitor from TRC shall be on-site during ACM removal/cleaning work to perform daily ambient area/background air monitoring at two to four locations, preferably near active work area(s). A minimum of at least two air monitoring stations shall be positioned outside the buildings near barriers (where feasible). Two sets of air samples will be collected per shift and analyzed daily using high volume pumps. Ambient air monitoring will be performed by TRC following the NIOSH

7400 PCM Method. Analysis of the air samples shall be on site so that corrections in the work practices can be made immediately if warranted. TRC will be responsible for providing adequate coverage on days there will be multiple work areas.

If the air monitoring results reach or exceed the MA DLS clean air criteria of 0.010 fibers per cubic centimeter (f/cc) of air, then all abatement related work shall be stopped. MassDEP shall be notified within 2 hours by TRC and the work methods shall be evaluated. Work may not proceed until MassDEP approves changes in work methods or approves restarting of the work if it is determined that no changes to work methods are needed.

The Contractor will provide temporary power, and enough GFCI protected electrical outlets and extension cords to allow the Asbestos Project Monitor to collect all required perimeter area and final clearance air samples.

All air samples shall be collected in the breathing zone, at a minimum of fifty-four inches (54") and a maximum of seventy-two inches (72") above the ground level. All air filter cassettes shall be changed periodically to prevent particulate overloading. Air monitoring series which repeatedly reveal samples that are overloaded with particulate and cannot be analyzed shall be in noncompliance.

TRC will conduct a visual inspection of each abatement work area for remaining visible debris to ensure that no visible dust or debris remains. Non-porous items will be visually inspected by TRC and removed from the work area for scrapping, recycling, disposal as C&D waste, or for use by Owner. The Contractor shall perform additional removal and decontamination as requested by TRC until the area and any items to be removed from the work area as non-ACWM have been approved.

PCM final air clearance samples will be collected by TRC inside of each contained abatement work area and analyzed on-site. The air sample results must be less than 0.010 fibers per cubic centimeter of air (f/cc), for the asbestos response action to be considered complete for that work area. TEM air samples may be utilized in lieu of PCM for larger work areas, with the results of all samples needing to be less than 70 structures per square millimeter (s/mm) for the asbestos response action to be considered complete for that work area. TRC will determine which type of air sampling method (PCM or TEM) will be utilized for clearance air sampling for each work area. PCM will typically be used for smaller work areas, with the number of samples based on 454 CMR 28.11(b)(c) for non-AHERA facilities. When TEM is used in lieu of PCM, 5 air samples will be collected by TRC and analyzed by a MA DLS certified laboratory.

MassDEP must be notified a minimum of 24 hours prior to the completion of the work of each phase (or abatement work area) to allow them the opportunity to conduct a post-inspection at the end of the project.

Contractor will cease all work immediately upon power failure/outage or loss of water and notify MassDEP within one hour of discovery.

At the end of each shift, the results of all air samples collected at the site and analyzed by TRC will be emailed to MassDEP at nero.asbestos@state.ma.us.



Jonathan Nicoll
Massachusetts Project Designer AD900372
Connecticut Abatement Designer 000854
Maine Design Consultant DC-0301
Rhode Island Project Designer APD00841

ATTACHMENTS

Site Diagrams, Designer License

776 SUMMER STREET -
SALVAGE &
DECONSTRUCTION
SET

Hilco
Redevelopment Partners

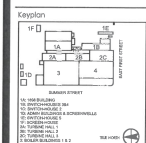
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The Right Return on Real Estate

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NorthStar
Engineering Group, Inc.

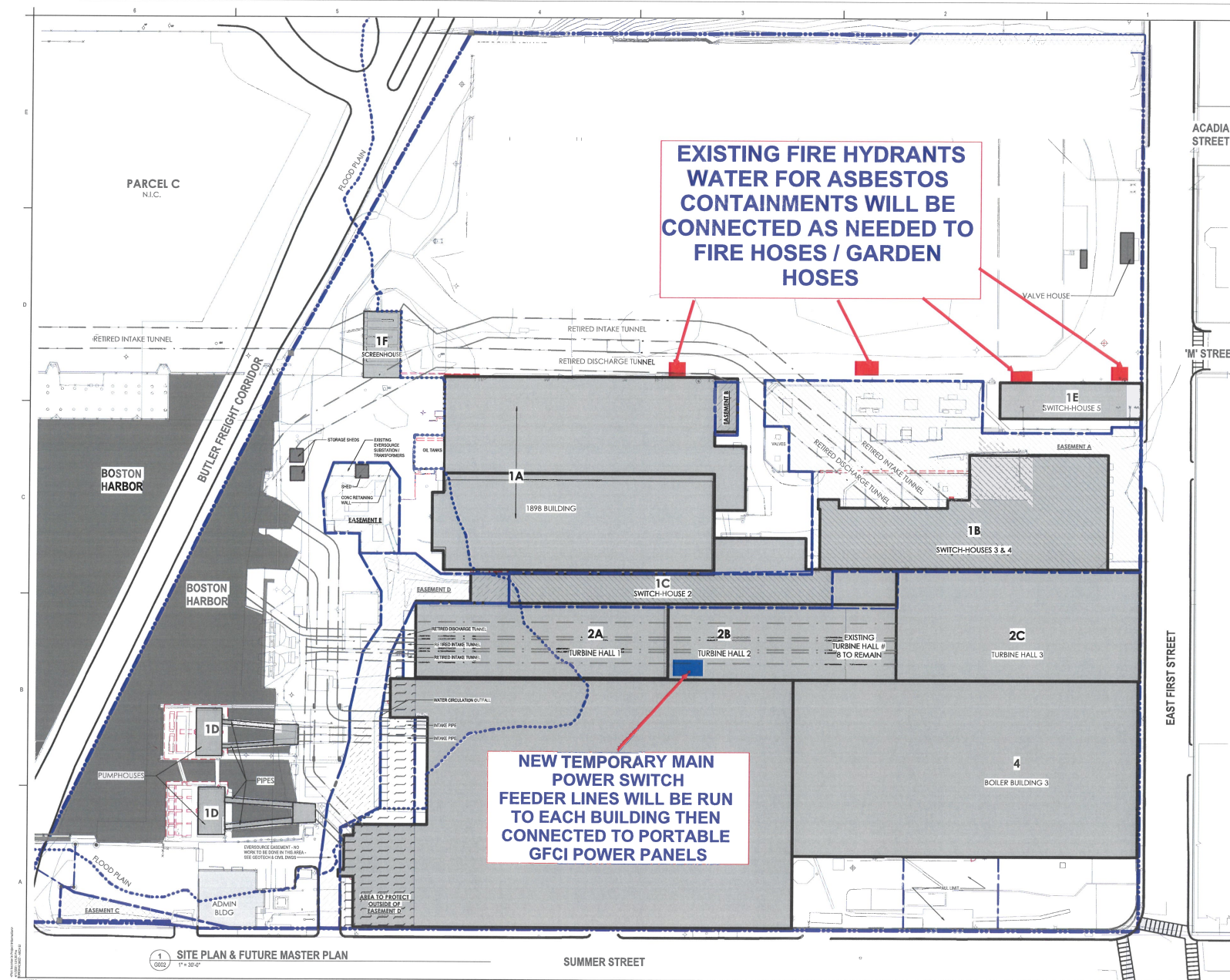


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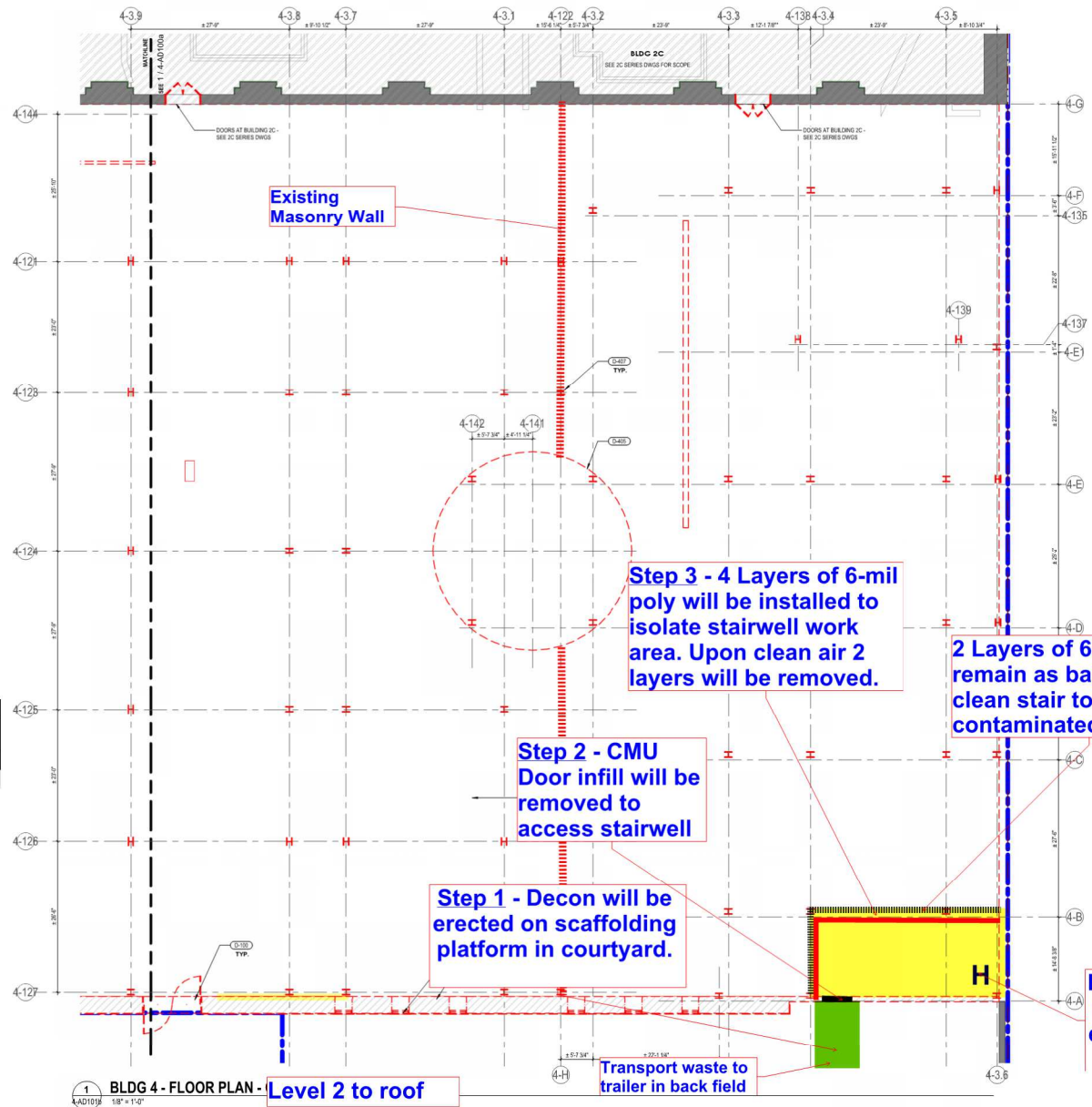
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CONSTRUCTION

Scale: As Indicated
Project No.: 11-0001-001
SITE PLAN (FOR
REFERENCE ONLY)

G002

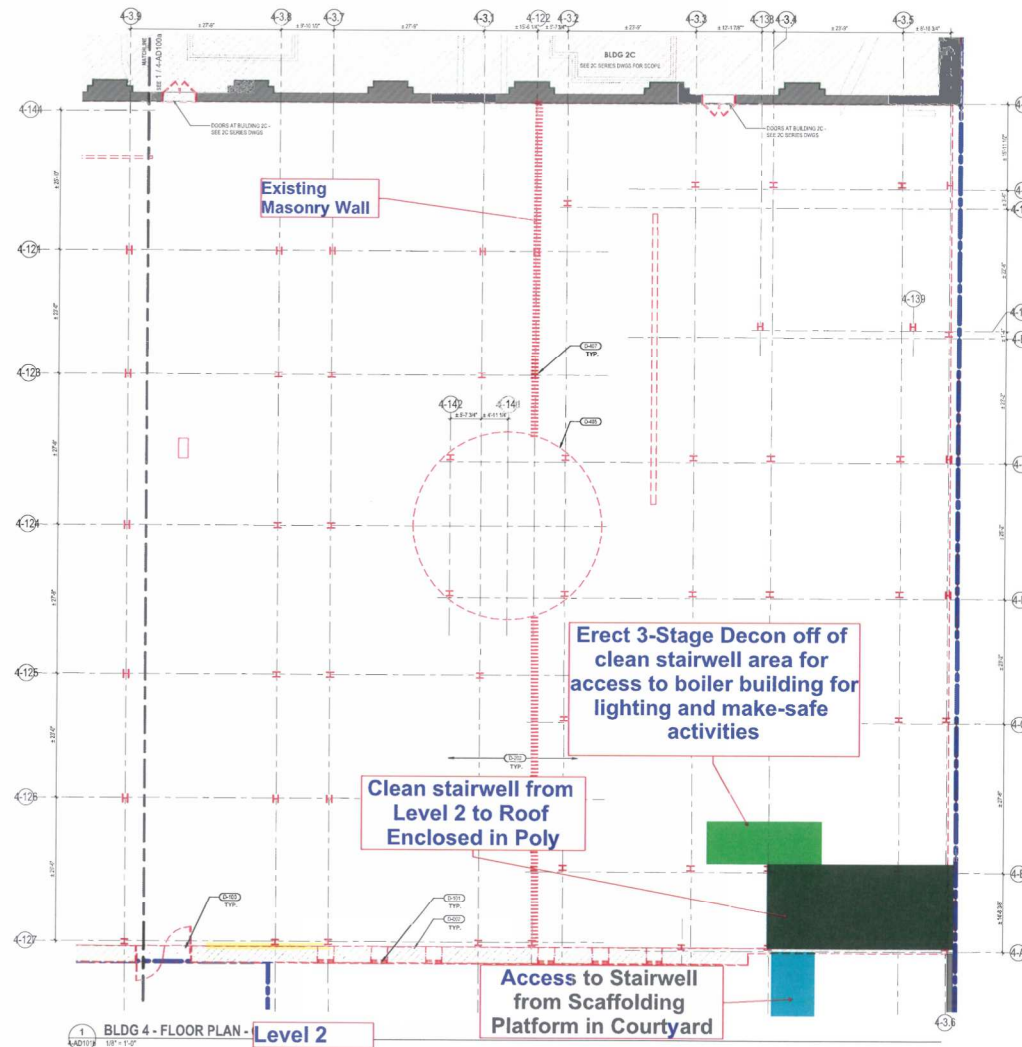


	Decontaminate interior space
Building 4 - Boiler Building 3 - SW Stairwell to Roof	approx 5000 sf
Proposed Abatement Crew - Supervisor plus 5 workers	



- LEGEND**
- CONTAINMENT AREA
 - 3-STAGE PERSONNEL DECON
 - WASTE LOAD OUT
 - HEPA EXHAUST TO EXTERIOR OF BUILDING
 - FRESH AIR INTAKE
 - H** 2000 CFM HEPA FILTERED AFD UNITS - INDIVIDUAL OR BANK
MINIMUM 1 ADDITIONAL AFD OR 2 ADDITIONAL IN LARGER AREA
WILL BE INCLUDED AS BACKUP UNITS

Building 4 - Boiler Bldg 3
Work on all levels throughout
for Life Safety Activities



776 SUMMER STREET -
SALVAGE &
DECONSTRUCTION
SET

Hilco
Redevelopment Partners

REDGATE
The Right Return on Real Estate

Stantec

STANTEC ARCHITECTURE INC.
301 Summer Street
Boston, MA 02203-4723
Tel: 617-778-3300
www.stantec.com

CONSULTANT



NorthStar
Constructing Group, Inc.

Oct 22, 2021

NO. 1	BLDG 4 - FLOOR PLAN - Level 2
NO. 2	BLDG 4 - FLOOR PLAN - Level 3
NO. 3	BLDG 4 - FLOOR PLAN - Level 4
NO. 4	BLDG 4 - FLOOR PLAN - Level 5
NO. 5	BLDG 4 - FLOOR PLAN - Level 6
NO. 6	BLDG 4 - FLOOR PLAN - Level 7
NO. 7	BLDG 4 - FLOOR PLAN - Level 8
NO. 8	BLDG 4 - FLOOR PLAN - Level 9
NO. 9	BLDG 4 - FLOOR PLAN - Level 10
NO. 10	BLDG 4 - FLOOR PLAN - Level 11
NO. 11	BLDG 4 - FLOOR PLAN - Level 12
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NO. 97	BLDG 4 - FLOOR PLAN - Level 98
NO. 98	BLDG 4 - FLOOR PLAN - Level 99
NO. 99	BLDG 4 - FLOOR PLAN - Level 100

NOT FOR
CONSTRUCTION

Scale: 1/8" = 1'-0"
Project No.: 210421293
BLDG 4 - FLOOR PLAN
- GRADE (SOUTH)

4-AD101b

776 SUMMER STREET -
SALVAGE &
DECONSTRUCTION
SET

Hilco
Redevelopment Partners

REDGATE
The Right Return on Real Estate

Stantec

Stantec Architecture Inc.
311 Summer Street
Boston, MA 02203-1723
Tel: 617.778.2500
www.stantec.com

CONSULTANT



NorthStar
Contracting Group, Inc.

Oct. 22, 2021

NO.	DESCRIPTION	DATE
1	ISSUED FOR PERMIT	10/22/21
2	ISSUED FOR CONSTRUCTION	10/22/21
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Form/Useful

NOT FOR
CONSTRUCTION

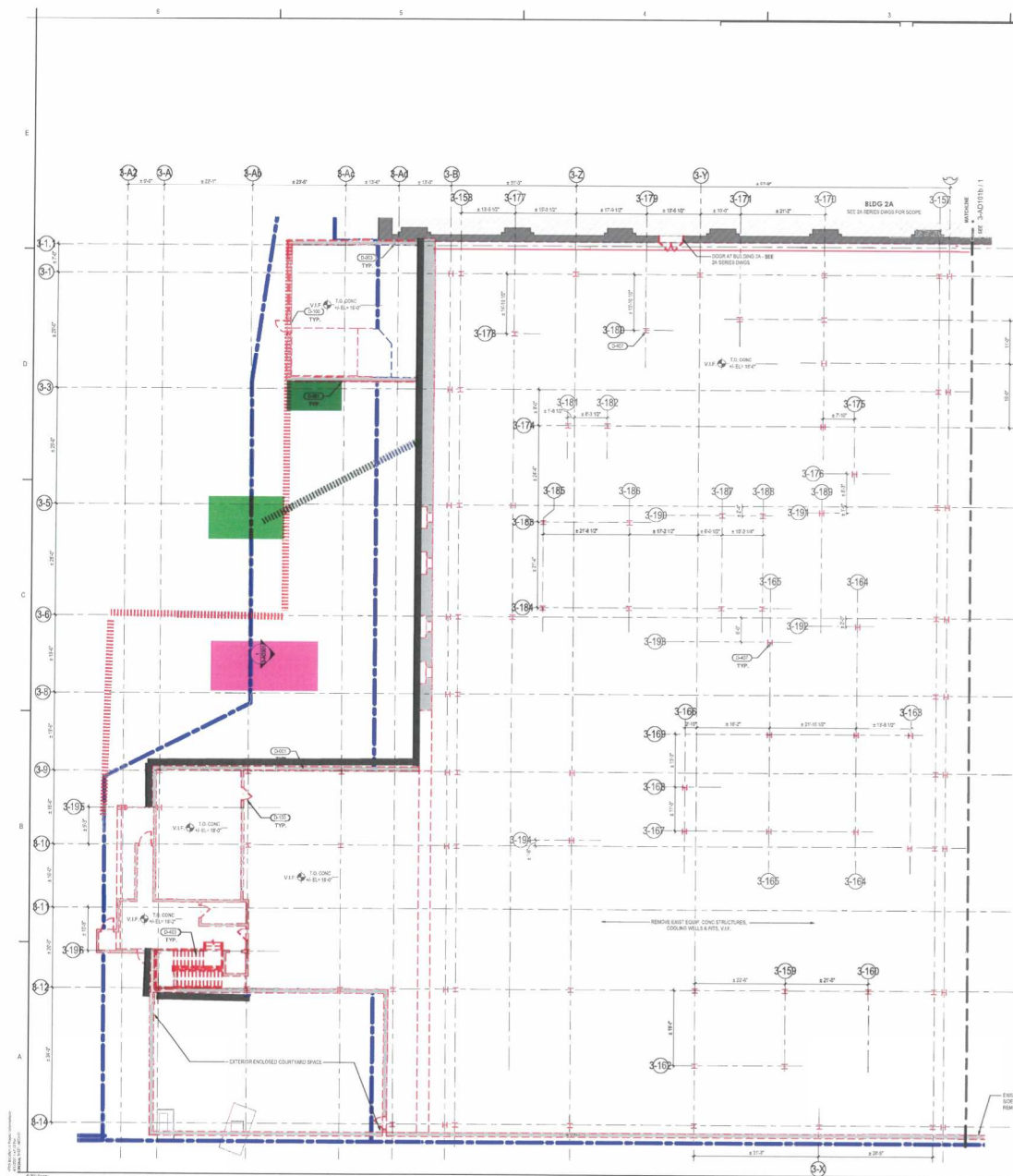
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Project No.: 218671295
BLDG 3 - FLOOR PLAN -
GRADE (NORTH)

3-AD101a

LEGEND

- Caution Tape
- Exterior Metal Panels
- ACM Lined Dumpster
- 3-Stage Personnel Decon
- High Reach Excavator

REMOVAL OF EXTERIOR METAL WALL PANELS W/ACM CAULKING

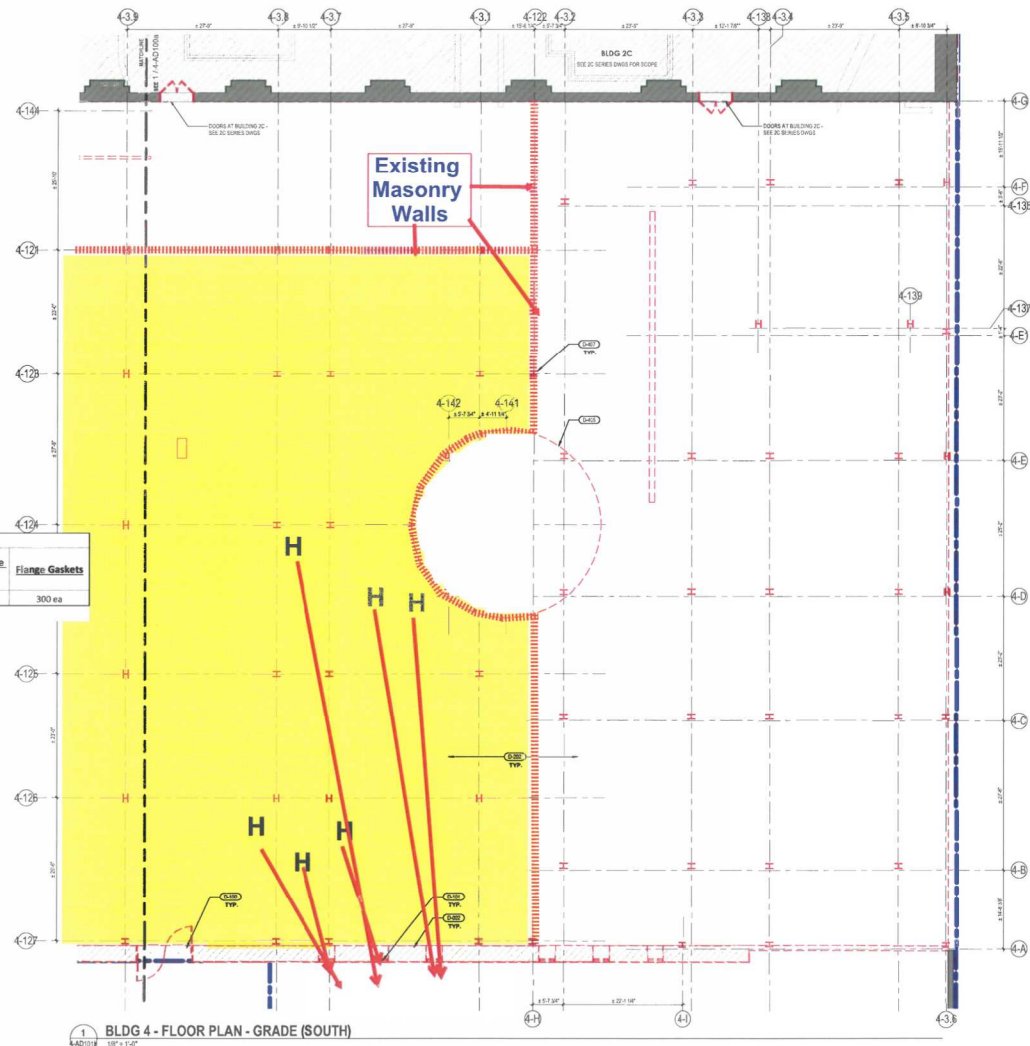


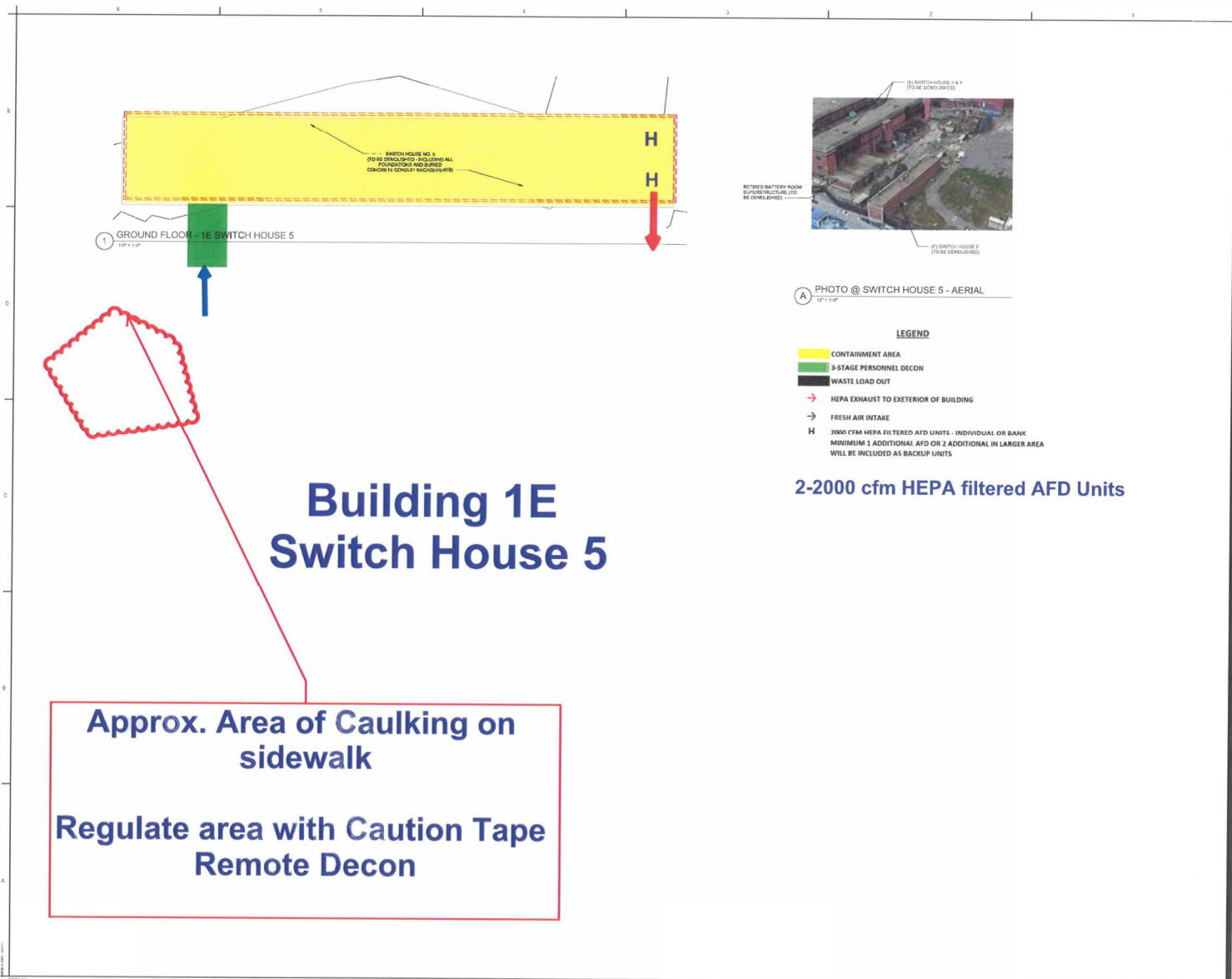
1 BLDG 3 - FLOOR PLAN - GRADE (NORTH)
1" = 10'-0"

CONSULTANT



4-AD101b





776 SUMMER STREET -
SALVAGE &
DECONSTRUCTION
SET

Hilco
Redevelopment Partners

REDGATE
The Right Source on the Right

Stantec

Stantec Architecture Inc.
211 Summer Street
Boston MA 02110
617.261.1100
www.stantec.com

CONSULTANT

SIMPSON GUMPERT & REGIER
Engineering & Construction
1000 South Main Street
Boston MA 02110
617.261.1100
www.simpson-gumpert.com

Keyplan



NorthStar
Constructing Group, Inc.

Oct. 22, 2021

Project Name	776 SUMMER STREET - SALVAGE & DECONSTRUCTION SET
Project Number	1E-SD101
Project Location	776 SUMMER STREET, BOSTON, MA 02110
Project Owner	Hilco Redevelopment Partners
Project Manager	REDGATE
Project Engineer	Stantec
Project Architect	SIMPSON GUMPERT & REGIER
Project Consultant	Stantec Architecture Inc.
Project Date	Oct. 22, 2021
Project Status	NOT FOR CONSTRUCTION

NOT FOR
CONSTRUCTION

Scale: As Indicated
Project No.: 1E-SD101

SWITCH HOUSE 5
DEMO PLAN

1E-SD101

776 SUMMER STREET -
SALVAGE &
DECONSTRUCTION
SET

Hilco
Redevelopment Partners

REDGATE
The Right Return on Real Estate

Stantec

Stantec Architecture Inc.
211 Summer Street
Boston, MA 02110
Tel: 617.244.2100
www.stantec.com

CONSULTANT



NorthStar
Contracting Group, Inc.

Oct. 22, 2021

NO.	DESCRIPTION	DATE
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10	REVISION	

NOT FOR
CONSTRUCTION

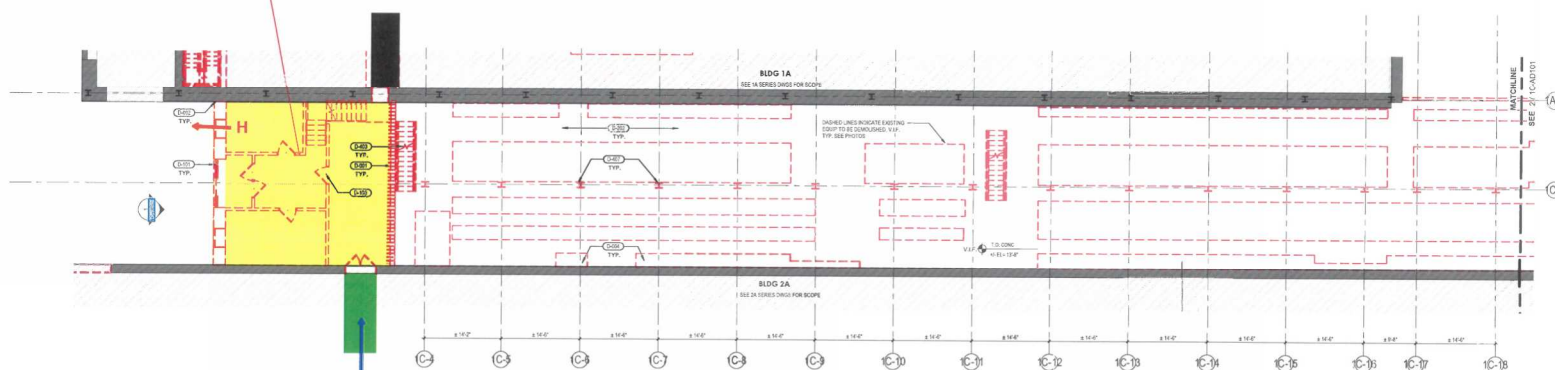
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Project No.: 15021102
BLDG 1C - FLOOR
PLAN - GROUND (L2.3
SIM.)

1C-AD101

- LEGEND**
- CONTAINMENT AREA
 - 3-STAGE PERSONNEL DECON
 - WASTE LOAD OUT
 - HEPA EXHAUST TO EXTERIOR OF BUILDING
 - FRESH AIR INTAKE
 - H 2000 CFM HEPA FILTERED AFD UNITS - INDIVIDUAL OR BANK
MINIMUM 1 ADDITIONAL AFD OR 2 ADDITIONAL IN LARGER AREA
WILL BE INCLUDED AS BACKUP UNITS

3-2000 cfm HEPA Filtered AFD Units
One on each floor venting out windows

Containment in front office
section will be inclusive of all
3 floors.



1 BLDG 1C - FLOOR PLAN - GROUND (NORTH)
1C-AD101 1/8" = 1'-0"

Stanlec Architecture Inc.
311 Summer Street
Boston, MA 02210-1723
Tel: (617) 234-3000
www.stanlec.com

CONSULTANT

[illegible]

NorthStar
Contracting Group, Inc.

Oct. 22, 2021

NOT FOR
CONSTRUCTION

Scale 1/8" = 1'-0"
Project No. 2107100
BLDG 1C - FLOOR
PLAN - GROUND (L2-3
SIM.)

1C-AD101

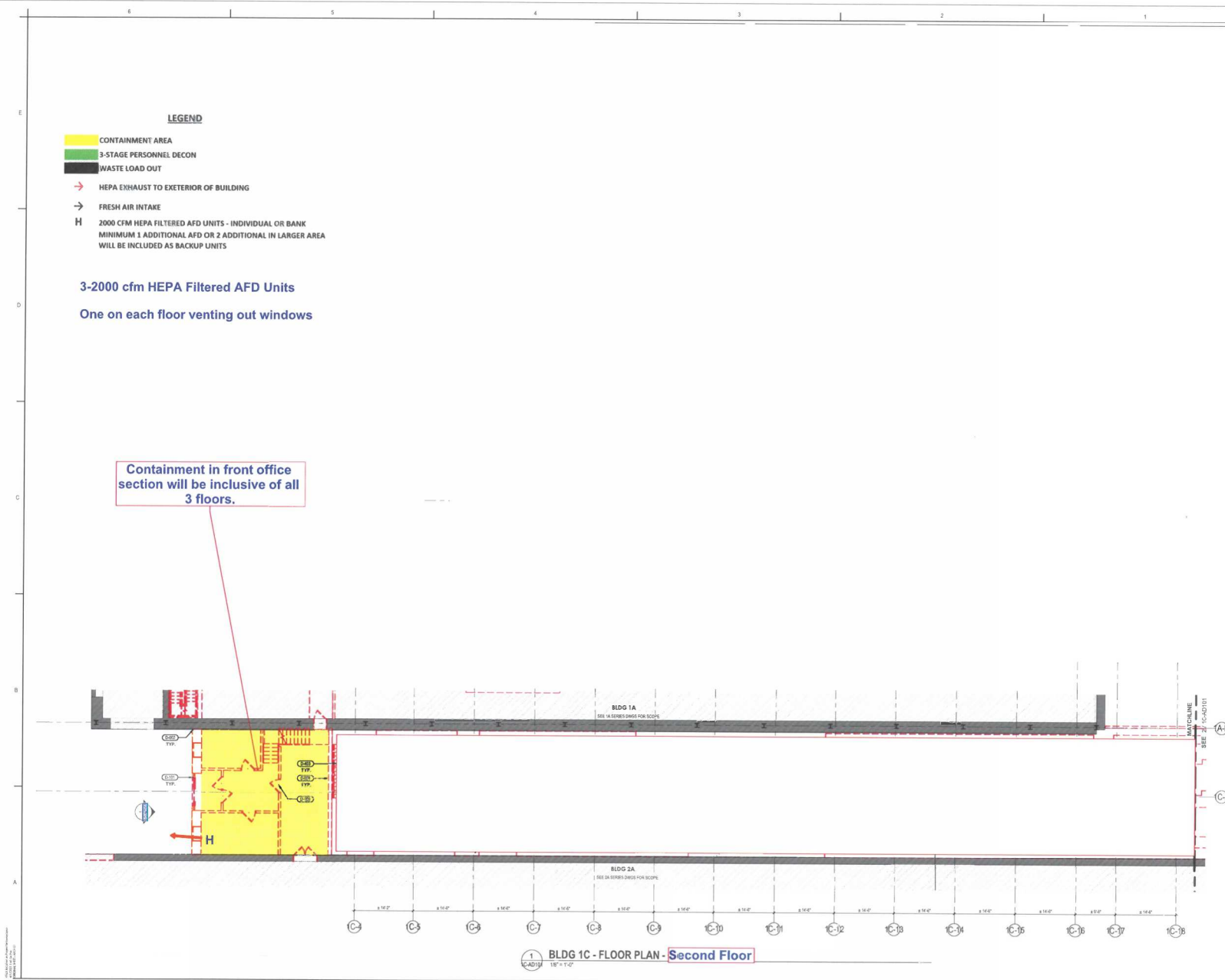
LEGEND

CONTAINMENT AREA
3-STAGE PERSONNEL DECON
WASTE LOAD OUT
→ HEPA EXHAUST TO EXTERIOR OF BUILDING
→ FRESH AIR INTAKE
H 2000 CFM HEPA FILTERED AFD UNITS - INDIVIDUAL OR BANK
MINIMUM 1 ADDITIONAL AFD OR 2 ADDITIONAL IN LARGER AREA
WILL BE INCLUDED AS BACKUP UNITS

3-2000 cfm HEPA Filtered AFD Units

One on each floor venting out windows

Containment in front office section will be inclusive of all 3 floors.



REDGATE
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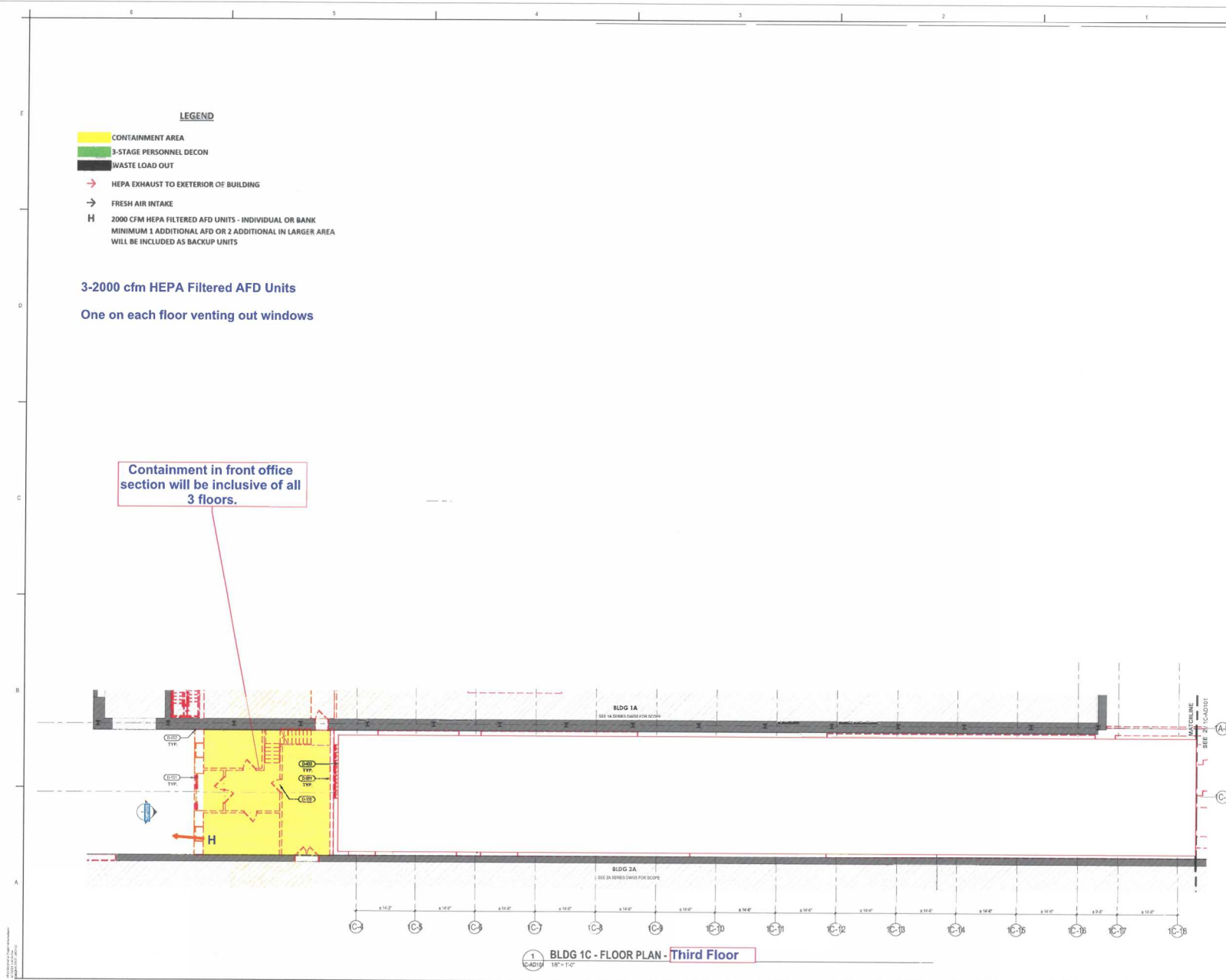
CONSULTANCY

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NOT FOR
CONSTRUCTION

Scale 1/8" = 1'-0"
Project No. 1000000000
BLDG 1C - FLOOR
PLAN - GROUND (L2-3
SIM.)

1C-AD101



1 BLDG 4 - FLOOR PLAN - LEVEL 2 WEST
4-AD101A 1/8" = 1'-0"

776 SUMMER STREET -
SALVAGE &
DECONSTRUCTION
SET

Hilco
Redevelopment Partners

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Stantec

Stantec Architecture Inc.
311 Summer Street
Boston, MA 02210
Tel: 617.224.2100
www.stantec.com
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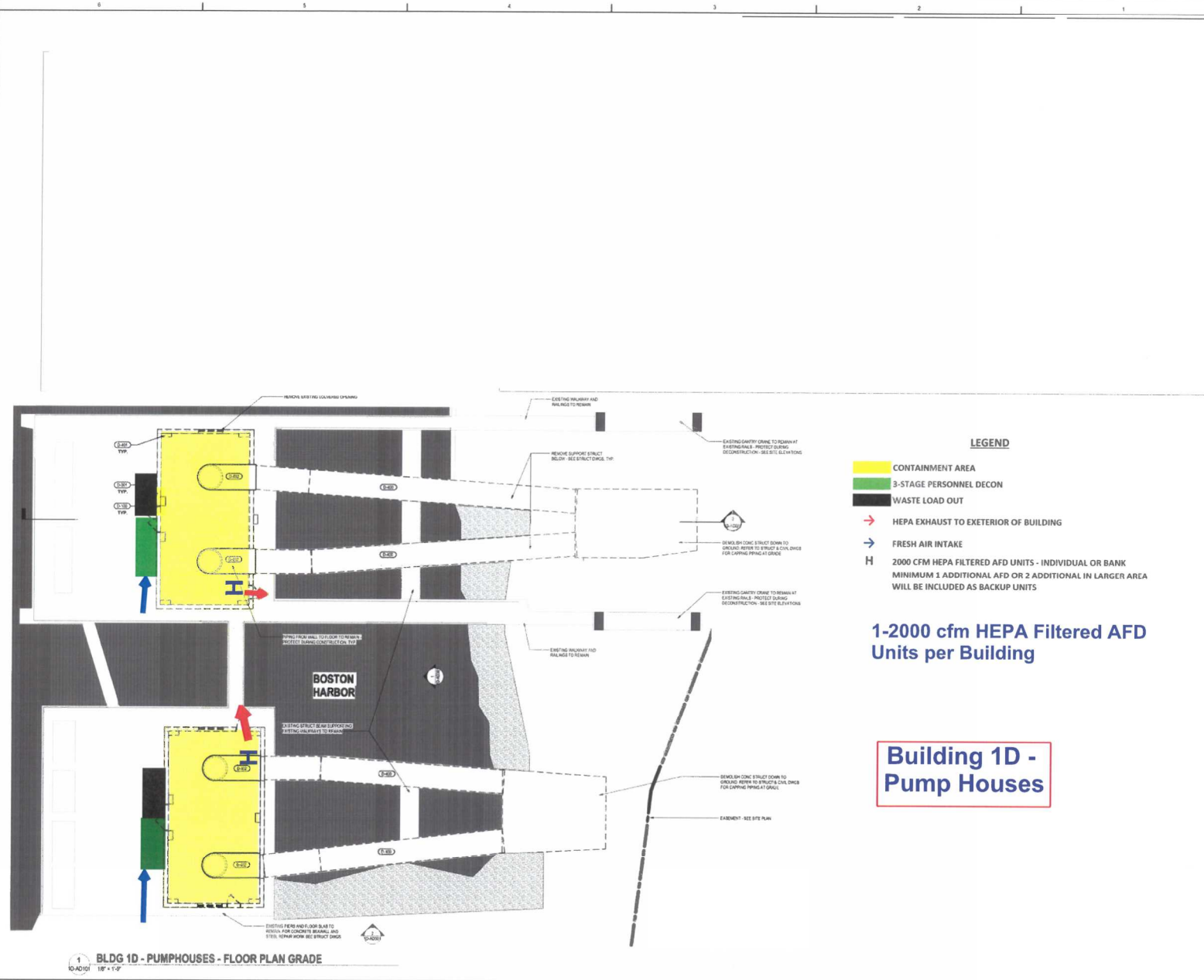
Oct. 22, 2021

Project Name	776 Summer Street - Salvage & Deconstruction
Project No.	21842195
Revision	1
Drawn By	10-AD101
Checked By	
Permit/Seal	

PRICING SET
NOT FOR
CONSTRUCTION

Scale 1/8" = 1'-0"
Project No. 21842195
BLDG'S 1D, 1E & 1F -
FLOOR PLANS

1D-AD101



Stantec Architecture Inc.
311 Summer Street
Boston, MA 02210-1723
Tel: (617) 234-3100
www.stantec.com

CONSULTANT

Stantec Architecture Inc.
311 Summer Street
Boston, MA 02210-1723
Tel: (617) 234-3100
www.stantec.com

CONSULTANT

CONSTANT

Keynote



NorthStar
Contracting Group, Inc.

October 22, 2021

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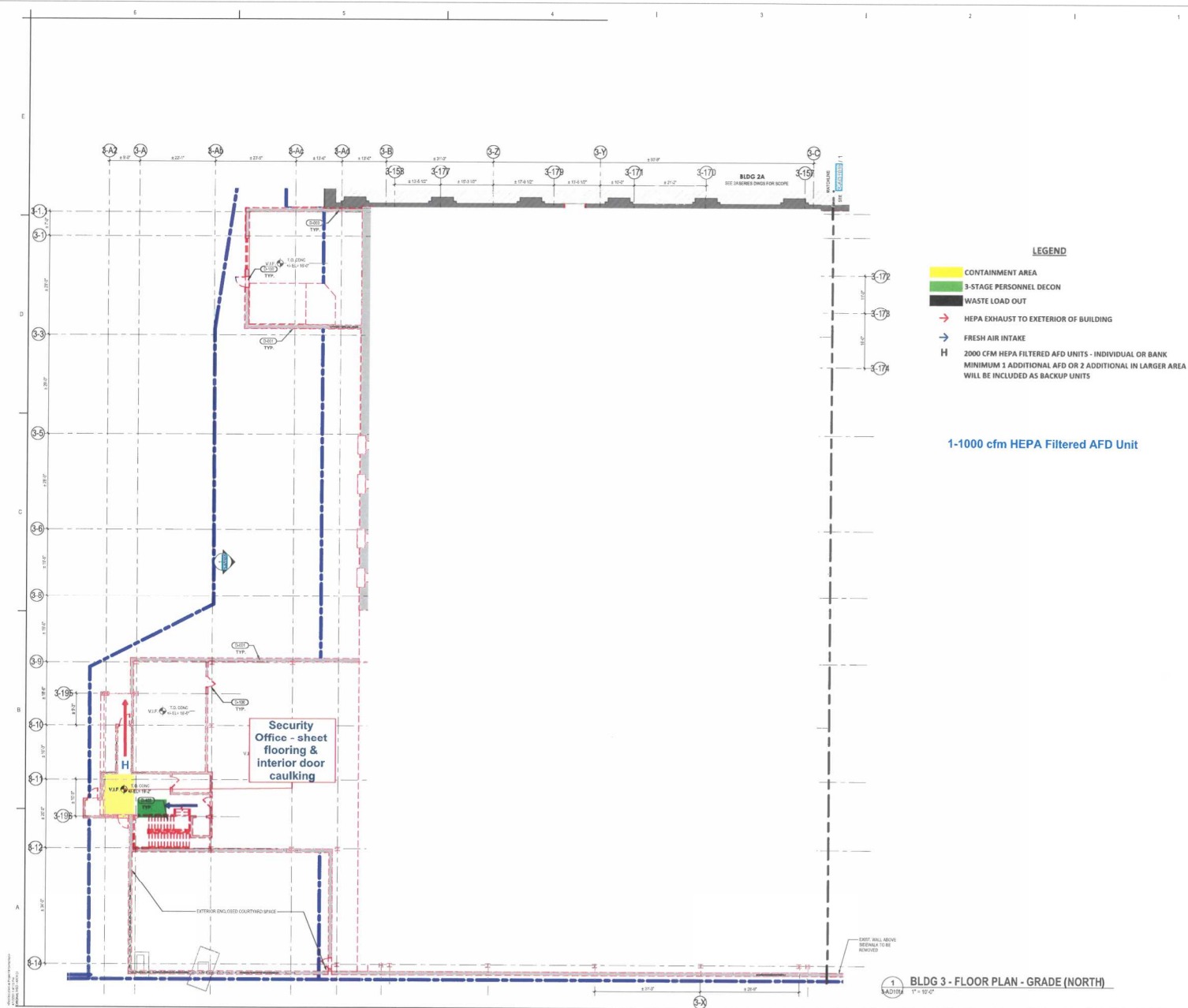
NOT FOR
CONSTRUCTION

Scale 1" = 10'-0"

Project No. 2018-001

**BLDG 3 - FLOOR PLAN
- GRADE (NORTH)**

3-AD101a



www.storotec.com
COMPTON

Kevplan



NorthStar
Contracting Group, Inc.

October 22, 2021

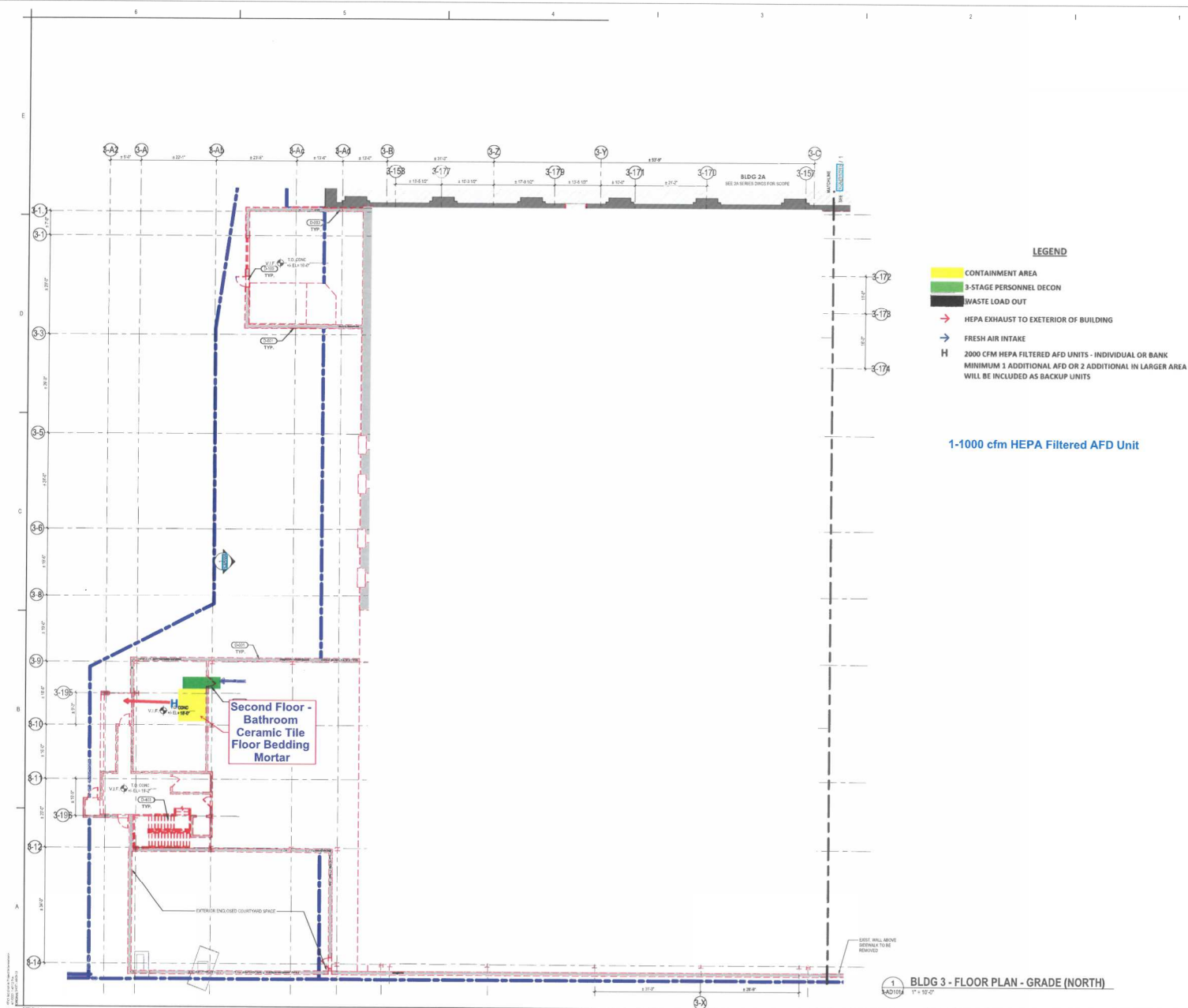
NOT FOR
CONSTRUCTION

Scale 1" = 10'-0"

Project No. 14-00000000

BLDG 3 - FLOOR PLAN
- GRADE (NORTH)

3-AD101a



776 SUMMER STREET -
SALVAGE &
DECONSTRUCTION
SET

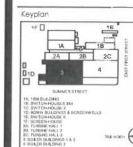
Hilco
Redevelopment Partners

REDGATE
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Stantec

STANTEC ARCHITECTURE P.C.
211 Summer Street
Boston, MA 02210-1023
Tel: (617) 254-2100
www.stantec.com

CONSULTANT



NorthStar
Contracting Group, Inc.

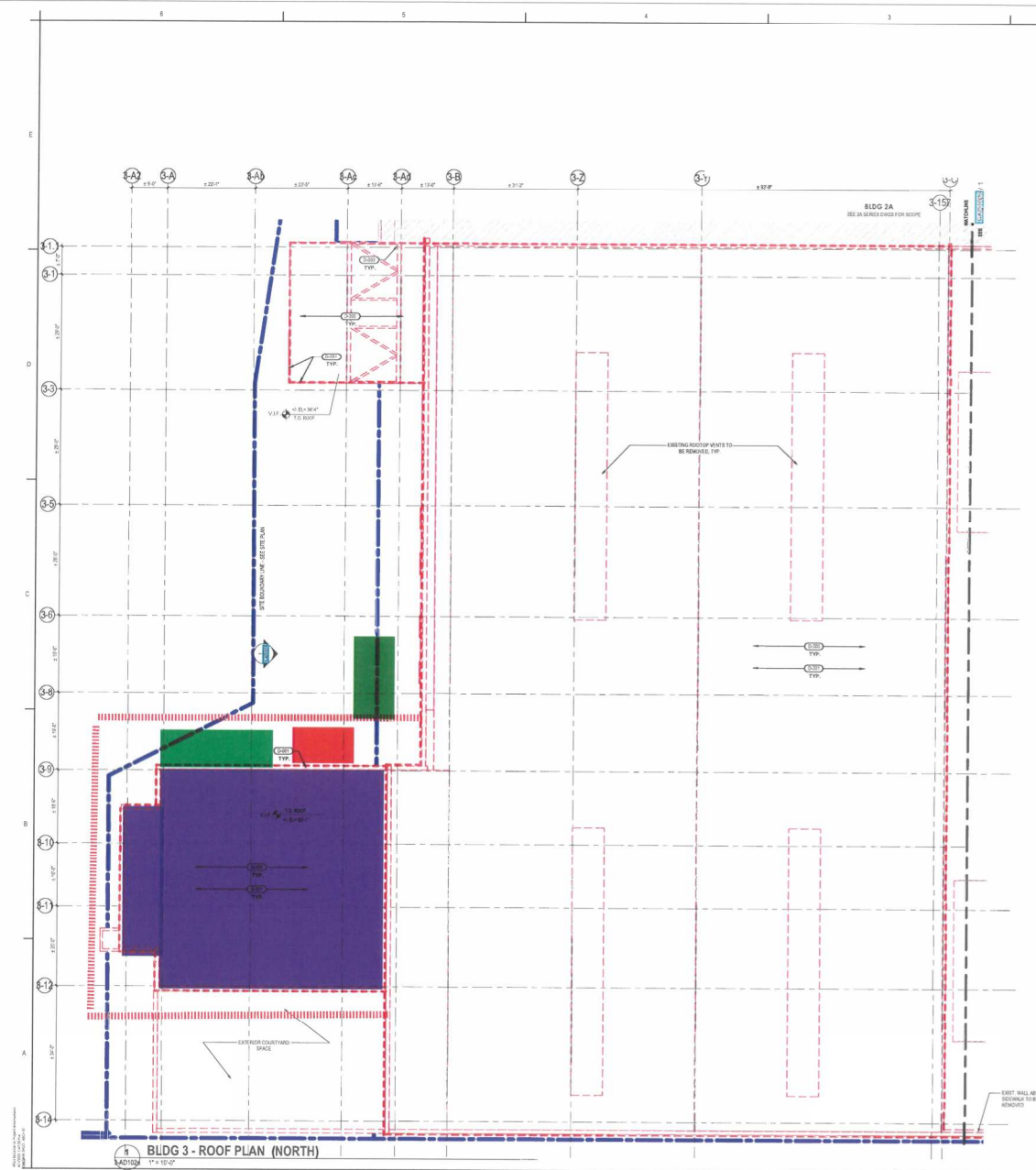
October 22, 2021

NO.	DATE	DESCRIPTION	BY	CHKD
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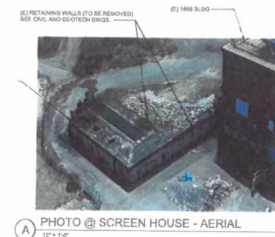
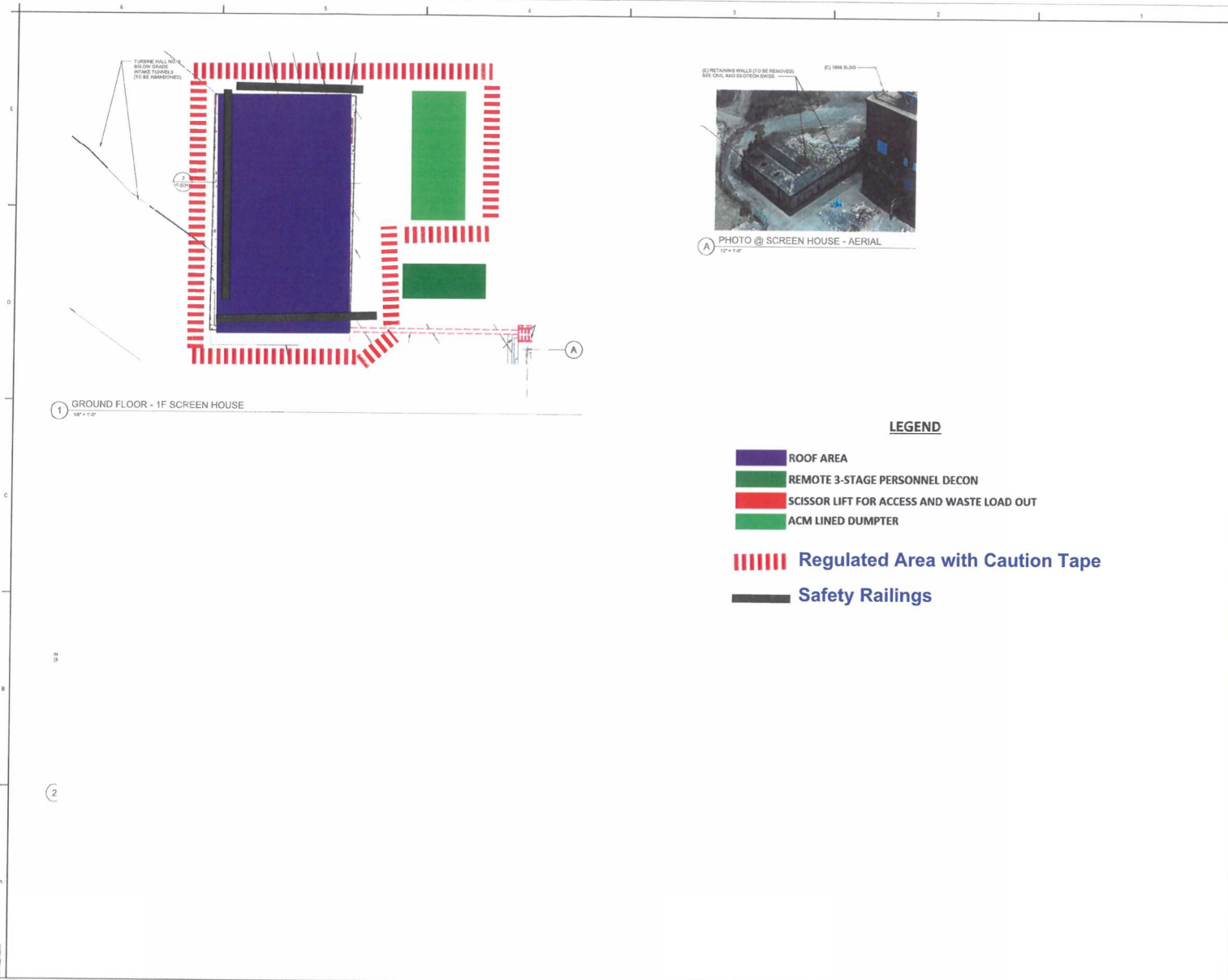
NOT FOR
CONSTRUCTION

Scale: 1" = 10'-0"
Project No: 3-AD102a
BLDG 3 - ROOF PLAN
(NORTH)

3-AD102a



- LEGEND**
- ROOF AREA
 - REMOTE 3-STAGE PERSONNEL DECON
 - SCISSOR LIFT FOR ACCESS AND WASTE LOAD OUT
 - ACM LINED DUMPTER
 - Regulated Area - Caution Tape



776 SUMMER STREET -
SALVAGE &
DECONSTRUCTION
SET

Hilco
Redevelopment Partners
REDGATE
The Right Entry on Real Estate

Stantec

Stantec Architecture Inc.
211 Summer Street
Boston, MA 02107
Tel: (617) 224-3300
www.stantec.com

CONSULTANT
SIMPSON GUMPERT & NEIGER

Engineering of Structures
and Building Envelope
Boston, MA
Tel: (617) 224-3300
www.simpson-gumpert.com



NorthStar
Contracting Group, Inc.

October 22, 2021

Project No.	200973.00
Project Name	SCREEN HOUSE DEMO PLAN
Project Location	776 SUMMER STREET, BOSTON, MA 02107
Project Date	10/22/2021
Project Status	NOT FOR CONSTRUCTION
Project Owner	Hilco Redevelopment Partners
Project Architect	Stantec Architecture Inc.
Project Engineer	Simpson Gumpert & Neiger
Project Contractor	NorthStar Contracting Group, Inc.

NOT FOR CONSTRUCTION

Scale As indicated
Project No. 200973.00
SCREEN HOUSE DEMO PLAN

1F-SD101

From: Macauley, John (DEP) <john.macauley@state.ma.us>
Sent: Wednesday, February 2, 2022 3:04 PM
Subject: [External] RE: Comments/questions 776 Summer Street Boston MA

MassDEP Bureau of Air and Waste has completed the review of the revised Non-Traditional Work Plan (NTWP) received on 2/1/2022 for 776 Summer Street, Boston, Massachusetts. MassDEP hereby approves the NTWP with the following conditions:

1. NorthStar Contracting Group, Inc. shall file an ANF001 utilizing approval number NNT22007 and waiver number NAW2201119.
2. MassDEP requires pre-abatement and post-abatement inspections. Work shall not start until the MassDEP pre-inspection has been conducted. Provide advance notice to schedule the required inspections. Scheduling of such inspections will be determined by MassDEP availability.
3. All requirements of the NTWP must be onsite, set-up, and in place at the time of the MassDEP pre-inspection.
4. MassDEP shall be notified immediately if the perimeter air monitoring results reach or exceed 0.010 f/cc. All air monitoring results shall be emailed on a daily basis to: NERO.Asbestos@mass.gov
5. If visible emissions are observed work must cease and MassDEP shall be notified immediately.
6. Any changes to the approved plan shall be submitted via an addendum to this NTWP for prior review and approval by MassDEP.
7. This approval is for the specific scope of work outlined in the 1/28/2022 NTWP. Remaining abatement at 776 Summer Street, Boston, including but not limited to, building 4, boiler house #3, building 1B, building 1C, switch houses #2, 3, and 4, buildings 2A-C, and dewatering activities requires a written addendum for prior review and approval by MassDEP.
8. The primary hauler of the ACWM shall be Red Technologies of Portland, CT. The primary disposal facility for the ACWM shall be Frank Road Portable Recycling Solutions located in Grove City, OH.
9. Copies of asbestos Waste Shipment Records shall be provided to MassDEP on the day the waste leaves the site of origin for disposal.
10. The final visual clearance documentation shall be provided to MassDEP.

By performing work pursuant to this Approval, the owner/operator and their contractors, subcontractors and consultants acknowledge and agree that failure to strictly comply with the work plan and conditions contained in this Approval may result in immediate revocation of this Approval and that all parties may be subject to enforcement action by MassDEP.

The applicant shall ensure that each party involved in this project receives a copy of the work plan and this Approval. A copy of the application, work plan and Approval shall be kept at the facility for the duration of the project.

Should unforeseen facility conditions require changes to any of the procedures in the work plan or this Approval, the applicant may request an amendment or addendum to the Approval. Any request for changes shall be made to MassDEP in writing. None of the added or amended conditions shall be utilized at the facility until the request has been reviewed and approved by MassDEP in writing. Should you have any questions please contact me.