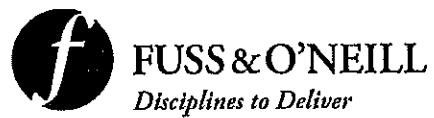


Lead and Abatement and Hazard Control Plan
51-55 Ferry Street
Middletown, Connecticut

Nehemiah Housing Corporation, Inc.
Middletown, Connecticut

March 17, 2009



Fuss & O'Neill EnviroScience, LLC
795 North Mountain Road
Newington, Connecticut 06111



FUSS & O'NEILL
EnviroScience, LLC

Disciplines to Deliver

March 17, 2009

Mr. Michael Taylor, Executive Director
Nehemiah Housing Corporation, Inc.
668 Main Street
Middletown, CT 06457

RE: *Revised Lead Abatement and Hazard Control Plan*
51-55 Ferry Street, Middletown, CT
Fuss & O'Neill EnviroScience Project No. 20072210.B1E

Dear Mr. Taylor:

Enclosed is the *revised* Lead Abatement and Hazard Control Plan for the above-referenced site. The plan was prepared in consultation with you. The plan has been prepared in accordance with the requirements of the City of Middletown Health Department for this building as provided in its Notice of Violation to Nehemiah on September 23, 2008 as well as subsequent discussions with Dennis Murray and Sal Nesci of the Department.

You must submit a copy of this plan to the local health department for their review and approval prior to commencing the work. If you have any questions regarding the contents of the plan, please do not hesitate to contact me.

Once the exterior hazard control work is satisfactorily completed, we will be able to prepare the **Lead Management Plan** required by the Department.

Sincerely,

Neal B. Freuden
President

NBF/lmb

Enclosure

795 N. Mountain Road
Newington, CT
06111

t (860) 953-2700
f (860) 953-3203

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INTRODUCTION

Work in this section is comprised of interim controls for the exterior of the building and lead abatement for the building interior. It is understood that the interim control work will precede the interior abatement work in order to achieve the objective of minimizing the exposure of the neighborhood residents to the hazardous levels of defective lead-based paint on the exterior of the building while Nehemiah waits for funding to complete the substantial rehabilitation of this building into affordable housing. It is also understood that once funding is achieved, many of the exterior building components subject to these interim controls will be removed and replaced with non-lead-based paint coated materials.

PROPERTY INFORMATION

Property Address: 51-55 Ferry Street
Middletown, Connecticut

Property Owner(s):	Physical Address:	Mailing Address:
Owner's Address:	Nehemiah Housing Corporation, Inc. 668 Main Street	Middletown, CT 06457

LEAD TESTING FIRM

Name: Fuss & O'Neill EnviroScience, LLC.
Address: 795 North Mountain Road
Newington, Connecticut 06111

Inspector's Name: Paul Batemen & John Coletti
Certificate Number: 001003 002114
Date of Testing: January 16, 2007

Testing/Sample Methodology: On-site x-ray fluorescence utilizing an RMD spectrum analyzer. Original testing performed in accordance with HUD Guidelines and State of Connecticut regulations.

PLANNER PROJECT DESIGNER

Name: Ethan T. Platt
Firm/Address: Fuss & O'Neill EnviroScience, LLC
795 North Mountain Road
Newington, Connecticut 06111
Certificate Number: 002138

POST-HAZARD CONTROL AND DEMOLITION LEAD INSPECTION FIRM

Name: Fuss & O'Neill EnviroScience, LLC.
Address: 795 North Mountain Road
Newington, Connecticut 06111



LEAD HAZARD CONTROL PROCEDURES - EXTERIOR

PREPARATION PRIOR TO WORK

- A. Post Warning Signs - Warning signs shall be posted at all entrances and exits to the work area.

WORK PROCEDURES

Interim Control Procedures

Interim controls are defined as a set of measures designed to temporarily reduce human exposure or likely exposure to lead paint hazards, including specialized cleaning, repairs, maintenance, painting, and temporary containment. The following containment preparations and safe work practices shall be utilized during interim control procedures involving standard treatments and corrective procedures that disturb paint that exceeds the following (de-minimus) quantities:

- Exterior large surfaces greater than 20 square feet
- Small building components where more than 10% of the paint will be disturbed

Work performed on surfaces equal to or greater than the above referenced amounts will need to be conducted using lead safe work practices.

Work involving the disturbance of paint that does not exceed the above quantities does not require the use of safe work practices or training of workers performing work as listed herein.

A. Exterior Preparation

1. Restrict access to the work area. Place warning tape at entrance to area.
2. Moveable objects must be removed from the work area..
3. Provide six-mil polyethylene protective sheeting in immediate area where interim control procedures are to be conducted sealed with tape. Floor or ground surface shall be covered a minimum of 5'-0" in any direction from component or surface to be worked on.
4. For exterior work protective sheeting shall extend 10'-0" from work surface or as space permits. If close to a street use vertical shrouds to protect passersby. Build a small curb at perimeter of sheeting to contain any paint chips or dust. Doors and windows within 20'-0" of the work area should be closed and sealed with protective sheeting.
5. Place all required tools and equipment in the work area so that area will not have to be left in order to complete the work. This will avoid stepping off the protective sheeting.



6. Use protective shoe covers, tack pads or have available cleaning materials to wipe off shoes prior to stepping off of protective sheeting.
7. Maintain polyethylene barriers, as long as needed for the safe and proper completion of the work.

B. Worker Protection and Training

1. Workers who will perform interim control procedures must have completed one of the following training courses:
 - EPA Lead Abatement Supervisor (40 hours)
 - EPA Lead Abatement Worker (32 hours)
 - HUD/EPA course "Work Smart, Work Wet, and Work Clean to Work Lead Safe" (8 hours)
 - HUD/NARI course "The Remodeler's and Renovator's Lead Based Paint Training Program" (8 hours)
 - Or another course, such as the UConn course, approved by HUD
2. Workers shall utilize eye protection, use disposable coveralls or coveralls that are to be laundered by employer, and respiratory protection. If respiratory protection is to be used worker must have a medical exam including pulmonary function test, questionnaire and receive additional training in accordance with OSHA regulations.
3. Workers shall ensure that dust is removed from protective clothing prior to leaving the work area, and wash hands and face prior to eating or drinking.

C. Interim Control Procedures

1. Paint Stabilization:
 - Prior to wrapping the building in the protective enclosure described in this plan, if it is necessary to scrape any loose flaking or peeling paint, it should be done utilizing "wet methods" employing a hand scraper and a spray bottle.

LEAD ABATEMENT PROCEDURE: INTERIOR "GUT" REHABILITATION

SUMMARY

Provide demolition of all interior building components other than unpainted structural members and removal of waste which will be characterized as to whether it must be disposed of as hazardous waste or can be disposed of as ordinary construction wastes by a EPA Whole Building Demolition Debris sample to be analyzed by the Toxic Characteristic Leachate Procedure (TCLP) method prior to demolition. Required permits shall be obtained by the Contractor at no additional cost to the Owner.



CODE/STATUTE COMPLIANCE

- A. The statutes and building code requirements of the local authorities having jurisdiction shall supersede those of these Specifications.

PROJECT CONDITIONS

- A. Occupancy:
 1. No portions of the building shall be occupied.
- B. Unforeseen Conditions: Should unforeseen conditions be encountered that affect design or function of project, investigate fully and submit an accurate, detailed, written report to the office of the Consultant. While awaiting a response, reschedule operations if necessary to avoid delay of overall project.

EXAMINATION

- A. Verify that utilities have been disconnected and sealed.
- B. In so far as is practicable, arrange operations to reveal unknown or concealed conditions for examination and verification before removal or demolition.
- C. Verify actual conditions to determine, in advance, whether removal or demolition of any element will result in structural deficiency, overloading, failure, or unplanned collapse.

EXPLOSIVES

- A. Do not use explosives.

POLLUTION CONTROLS

- A. Control as much as practicable the spread of dust and dirt.
- B. Observe environmental protection regulations.
- C. Do not allow water usage that result in freezing or flooding.
- D. Do not allow adjacent properties to remain to become soiled by demolition operations.

DISPOSAL OF REMOVED AND/OR DEMOLISHED MATERIALS

- A. All building waste shall be properly handled and prior to the commencement of the work, a "EPA Whole Building Demolition Debris" sample using the Toxic Characteristic Leachate Procedure (TCLP) so that the waste stream can be properly characterized and appropriate disposal procedures can be followed
- B. Promptly dispose of materials resulting from component removal and demolition operations. Do not allow materials to accumulate on site.



- C. Transport materials resulting from demolition operations and legally dispose of off site.
- D. Do not burn removed materials on project site.



LEAD HAZARD CONTROL AND ABATEMENT PLAN

51-55 FERRY STREET
MIDDLETOWN, CONNECTICUT

SCOPE OF WORK

GENERAL NOTES:

1. 51-55 Ferry Street is a wood sided three-family house. The front and sides of the building's exterior extending at least 2 feet past the fencing barriers shall be wrapped with either 4 mil plastic sheeting or Tyvek to completely enclose that section of the building, with the edges sealed as to stop any falling or wind-blown debris from further contaminating the area.
2. The workers must be properly trained to perform Lead Safe Work Practices when performing any work on the exterior or during the gut-demolition of the interiors.
3. All defective lead-based painted surfaces shall be abated or controlled per this plan. In addition, any enclosed or encapsulated lead-based paint surfaces will also be included in the management plan which will follow the completion of interim controls.
4. During gut-renovation and exterior work dust control measures must be utilized to ensure no contamination from the activities impact adjacent properties.
5. All waste from the site must be disposed of as Hazardous Waste unless a Toxic Characteristic Leachate Procedure (TCLP) test proves otherwise.
6. Upon completion of both phases of the work, visual inspections will be conducted by a State of Connecticut licensed Lead Inspector for the presence of **visible** paint chips and debris. The area shall be free of any **visible** (regardless of size) debris.



51-55 FERRY STREET, MIDDLETOWN, CONNECTICUT

LOCATION	COMPONENT	CONDITION	CORRECTIVE ACTION
Interior	ALL	Intact / Defective	<p>Gut Renovation All building components other than unpainted structural members shall be removed from the building.</p> <p>All waste from the site must be disposed of as Hazardous Waste unless a Toxic Characteristic Leachate Procedure (TCLP) test proves otherwise.</p>
Exterior:	ALL	Defective	<p>"Hazard Control" & "Remove & Replace"</p> <p>Utilizing Lead Safe Work Practice, provide removal of any areas of loose flaking paint on the exterior of the front and sides of the building extending at least 2 feet past the fencing barriers. Once these areas are rendered intact, this section of the building shall be wrapped in 4 mil Poly sheeting or Tyvek to completely cover that section of the building until such time as the enclosed lead-based painted materials are removed for refurbishment. All edges shall be sealed in order to trap and collect any falling or windblown debris.</p> <p>As an alternate, rather than scraping lead-based paint from the above-referenced building components, these components may be removed using lead safe work practices prior to the wrapping of the building section. If this approach is taken, all waste from the site must be disposed of as Hazardous Waste unless a Toxic Characteristic Leachate Procedure (TCLP) test proves otherwise.</p> <p>Ultimately, during the renovation of the building exterior, all materials with defective lead paint shall be removed and replaced with new materials. All waste from the site must be disposed of as Hazardous Waste unless a Toxic Characteristic Leachate Procedure (TCLP) test proves otherwise.</p>