March 10, 2021

Mr. Mark Carpenter, P.E. District 12 Environmental Engineer 5500 Transportation Blvd Garfield Hts., Ohio 44125

Re: CUY-BH-FY2023 Misc (PID 105909) Asbestos Survey CUY-480-0.000, I-480/71 ramp over I-480 Mainline SFN 1814249

Dear Mr. Carpenter,

EnviroScience, Inc. was contracted by the Ohio Department of Transportation to provide an asbestos survey of the CUY-480-0.000 bridge structure over Interstate 480. The bridge location coordinates are 41.42056, -81.81583.

The 348-foot long four-span continuous steel beam bridge with reinforced concrete deck and substructure will undergo replacement. Bridge inventory report information indicates the structure to have been originally built in 1980. A site location map is included in Appendix A.

Asbestos Regulations and Definitions

Prior to the demolition or renovation of a structure (including bridge structures), an asbestos inspection must be conducted by a licensed asbestos hazard evaluation specialist in accordance with National Emissions Standard for Hazardous Air Pollutants (NESHAP) Guidelines, EPA Regulation 40 CFR, Subpart M, Part 61 and OEPA asbestos regulations (OAC 3745-20). Further, the Occupational Safety and Health Administration's (OSHA's) Asbestos Standard for the Construction Industry (29 CFR 1926.1101) regulates all renovation and demolition work involving building materials which contain any amount of asbestos.

NESHAP, OEPA, and OSHA asbestos regulations define asbestos-containing material (ACM) as any material containing greater than one (1) percent asbestos as determined by polarized light microscopy. NESHAP regulations require that all materials suspected of containing asbestos be sampled to determine asbestos content or be assumed to be an ACM and, therefore, treated as such. Materials that are determined or assumed to be ACMs shall be quantified and assessed by a licensed inspector. The materials then shall be characterized and assigned one of the following designations: Friable, Category I Non-friable, and Category II Non-friable.

<u>Friable ACM</u> is defined by the Asbestos NESHAP regulations as any material containing more than one percent (1%) asbestos as determined using the method specified in Appendix E, Subpart E, 40 CFR Part 763, Section 1, Polarized Light Microscopy (PLM), that, when dried, can be crumbled, pulverized, or reduced to powder by hand pressure.

<u>Non-friable ACM</u> is any material containing more than one percent (1%) asbestos as determined using the method specified in Appendix E, Subpart E, 40 CFR Part 763, Section 1, Polarized Light Microscopy (PLM), that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure. Non-friable ACM can remain on the structure during renovation/demolition if it will not be sanded, grinded, cut, abraded, or made friable by any means. The two categories of non-friable ACM are described as follows:



5070 Stow Road Stow, OH 44224

- <u>Category I Non-friable ACM</u> asbestos-containing packing, gaskets, resilient floor covering, and asphalt roofing products.
- <u>Category II Non-friable ACM</u> any asbestos-containing material excluding Category I Nonfriable ACM.

<u>Regulated ACM</u> (RACM) is defined as:

- Friable asbestos material.
- Category I Non-friable ACM that has become friable.
- Category I Non-friable ACM that has been or will be involved in sanding, grinding, cutting, or abrading.
- Category II Non-friable ACM that has a high probability of becoming crumbled, pulverized, or reduced to powder by forces expected to act on the material during renovation or demolition.

Asbestos Survey Summary

<u>Bridge Plan Review-</u> Prior to the field survey, EnviroScience performed a limited review of available bridge construction plans that were compiled by the department and placed on ODOTs FTP site. Based on our review of portions of CUY-480-0.000 plans a 2" electric conduit for lighting was depicted running withing the northwest parapet. The conduits may have the potential to contain asbestos but are encased in the parapet concrete. No other conclusive evidence of suspect ACM was noted.

<u>Asbestos Survey-</u> An asbestos survey of the subject bridge structure was conducted on 01/13/21 by C.E. Kessler, Certified Asbestos Hazard Evaluation Specialist #ES34704 and Amy Wakefield, Certified Asbestos Hazard Evaluation Specialist #ES543881.

All accessible portions of the CUY-480-0.000 bridge were field investigated for the presence of suspected ACMs. A visual inspection of the top and bottom sides of the structure including the deck, parapets, beams, and abutments was conducted. No utilities were affixed beneath the structure.

The following table summarizes the samples that were collected:

Table 1 – Sample Summary – CUY-480-0.000 Bridge SFN 1814249									
Sample	Homogeneous Area	Category	Location of Sample	Positive for Asbestos?					
	"No Samples Taken"								



Bulk samples collected are submitted to IATL International Asbestos Testing Laboratories of Mount Laurel, New Jersey, for analysis of asbestos content by polarized light microscopy (PLM) using the Environmental Protection Agency (EPA) Method 600/R-93/116. Appendix B which is set aside for sampling documentation including Chain of Custody, bulk sampling log, and laboratory analysis report has been left blank due to the fact that no samples were taken in this instance. A bridge diagram and photo log are provided in Appendix C.

Conclusion and Recommendations

Visual inspection of the bridge indicates that no asbestos containing material appears to be present on the structure.

If suspect ACMs are revealed during demolition or renovation activities that were not identified during this survey it is recommended that work activities cease until a Certified Asbestos Hazard Evaluation Specialist can evaluate the new material(s). Any removal and subsequent disposal of the asbestos containing material during demolition operations must comply with the Ohio Administrative code, the Occupational Safety and Health Administration (OSHA) regulations and the National Emission Standard for Hazardous Air pollutants (NESHAP). Reference the Ohio Environmental Protection Agency adopted chapters 3745-20-03 & 3745-20-04 of the Ohio Administrative Code. This implements the NESHAP standards for asbestos and its removal.

Notification

An OEPA Notification of Demolition and Renovation form must be submitted ten (10) working days prior to work activities. Appendix D contains the OEPA form of which Section 1 - General Information 1, 2, 3, 4, and 5; and Section 2 - Project Address Specific Information A, B, C, and D have been completed.

Once the Contractor has been selected for the project, the remaining sections of the form shall be completed (as applicable) and the notification form submitted with the proper remittance to the following address at least 10 working days prior to starting work:

Ohio EPA, DAPC Asbestos P.O. Box 1049 Columbus, Ohio 43216-1049

The form may also be completed/submitted via on-line at https://epa.ohio.gov/dapc/atu/asbestos.

AHES Signature

Charles E. Kessler, AICP, CAHES, CEP Asbestos Hazard Evaluation Specialist #ES34704

Attachments



Appendix A





Appendix B



Sample Log

-Bulk Asbestos -

Client:_____ Project:_____

Sampling Date/Time:_____

Bulk Asbestos Sample Log								
Client Sample #	iATL #	Location/Description	Notes					

Appendix C

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Google Earth

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PHOTO 1 Looking north at CUY-480-0.000 bridge. No utilities affixed to the structure.



PHOTO 2 Looking at the south end wall. Concrete and steel only.



PHOTO 3 Facing north looking at the east side of the structure.



PHOTO 4 Underside of structure. South end.

PHOTO 5 Rocker and bearing plate, (all metal)

PHOTO 6 Topside of structure facing northwest.

Appendix D



Notification of Demolition and Renovation/Abatement

Section 1: General Information

Division of Air Pollution Control

Work on projects cannot begin until 10 working days after a COMPLETE original notification form, <u>including payment</u>, is submitted to Ohio EPA. Instructions and a worksheet for fee calculation are available at *epa.ohio.gov/asbestos*. This form can be completed, and payment made, at *ebiz.epa.ohio.gov*. Questions? *asbestos@epa.ohio.gov* or (614) 466-0061.

Ohio EPA Use Only Notification #: Postma	rked: /	/	Received:	/ /	Hand-Delivered			
1) Notification Information (Check all that apply)								
Original Revision # (count): Installation Emer	gency	Annual	Cancellation	Project Co	unty: Cuyahoga			
2) Owner, Asbestos Abatement Contractor, Billing and Fire Departmen	t Information	1	•		Revised?			
Owner								
Name: Ohio Department of Transportation								
Address: 5500 Transportation Blvd Contact Person: Mark Carpenter								
city: Garfield Heights	State: OH			Zip: 44	l125 -			
Email: Mark.Carpenter@dot.state.oh.us	Phone: (2	16) 584	- 2089	Fax: (Fax: () -			
Asbestos Abatement Contractor (if applicable)								
Name:	L	icense #: AC	Expiration Date: / /					
Address:	I	Contact Per	son:		1			
City:	State:			Zip:	Zip: -			
Email:	Phone: () -		Fax: () -			
Billing Contact								
Is this contact associated with the 🔲 Owner, 🗋 Asbestos Abatement Contractor, or 🗌 Demolition Contractor (if not installation)?								
Address:		Contact Per	son:					
City:	State:			Zip:	-			
Email:	Phone: () -		Fax: () -			
Fire Department (if applicable)								
Name:		-						
Address:		Contact Per	son:					
City:	State:			Zip:	-			
Email:	Phone: () -		Fax: () -			
3) Ohio Asbestos Hazard Evaluation Specialist and Evaluation Procedur	e				Revised?			
Evaluation Specialist: Charles Kessler	Cert	ification #: E	s 3470 4	Expira	ation Date: 10 / 7 / 2021			
Procedure, including analytical methods, employed to detect the presence of and to estimate the quantity of regulated asbestos-containing material (RACM) and Category I and Category II non-friable asbestos-containing material:								
Bulk Sampling w/point count of samples that are less than 10% asbestos containing								
4) Procedures to be followed should unexpected RACM be discovered (check all that apply) Revised?								
Stop work and keep wet	Demarcate ar	ea	□ Co	ontact licen	sed abatement contractor			
Contact district office/local air authority								
🛛 Other (Explain): Notify ODOT Project Engineer and Project Superintendent								
5) Planned Demolition (check all that apply) Revised?								
Describe demolition work to be performed and method(s) to be employed, including demolition techniques to be used:								
Existing structure components will be removed by industry standard means and methods								

Mail completed form and payment to: Ohio EPA, DAPC – Asbestos P.O. Box 1049, Columbus, OH 43216-1049

Continued

Description of affected facilit	y components (include a	attachment if necessary)):								
(Revised 02/18)		Page	1	of	3						
6) Asbestos Description an	d Engineering Controls ((if asbestos is being aba	ited)			_					Revised?
For the material listed in each ensure proper waste handlin	n project, describe the ty g:	vpe(s) of ACM to be aba	ted, eng	gineerii	ng contro	ols and wor	k practices	to be use	d to mini	mize emi	issions and
Type of ACM to be abated:	Surfacing	Mechanical	0	ther							
Engineering Controls:	U Wet Methods	Glove Bag									
Work Practices:	Intact Removal	Manual		lechan	ical 🗌	Other:	I				
7) Asbestos Waste Transpo	orter (if applicable)	I									Revised?
Transporter #1 Name:											
Address:					Contact	t Person:					
City:			State:					Zip:	-		
Email:			Phone	: ()	-		Fax: ()	-	
Transporter #2 Name (if appl	icable):										
Address:					Contact	t Person:					
City:			State:					Zip:	-		
Email:			Phone: ())) -		Fax: ()	-	
8) Asbestos Waste Disposa	l Site (if applicable)										Revised?
Name:											
Address:					Contact	Person:					
City:			State:					Zip:	-		
Email:				: ()	-		Fax: ()	-	
9) Emergency Demolition (complete if you checked	d "Emergency" above a	nd "Der	nolitio	n" for a	ny project)					Revised?
A copy of the issued order, in	cluding the following inf	formation, must be atta	ched to	this n	otificatio	on.					
Government Official Issuing C	Order:		Titl	le:							
Agency:			Authority of Order (Citation of Code):								
Date of Order: / /			Demolition Date: / /								
10) Emergency Renovation/	Abatement (complete i	f you checked "Emergei	ncy" abo	ove an	d "Reno	vation/Aba	tement" fo	r any proj	ect)		Revised?
Date of Emergency: /	/		Tin	ne of E	mergeno	су: :	🗌 a.m.	🗌 p.m.			
Description of Sudden, Unex	pected Event:										
Explanation of how the even	t caused unsafe conditio	ons or equipment damag	ge:								
11) Attestation											Revised?
In accordance with Ohio Adm the Administrative Code will is prohibited by law and I cert	inistrative Code rule 37 supervise the stripping a tify that facts contained	45-20-03(A)(4)(p), I cert ind removal described b in this notification are t	ify that by this no rue, acc	at leas otificat urate,	t one pe tion. I ac and com	rson trained cknowledge nplete.	d as require that the su	d by para bmission	graph (B) of false o	of rule 3 r mislead	3745-20-04 of ding statements
Signature:						Dat	e: / /				
Name: Mark Carpenter					trict 1	2 Enviro	nmental	Engine	er		
Organization: Ohio Depai	rtment of Transpo	ortation	1					-			



Notification of Demolition and Renovation/Abatement Section 2: Project Address Specific Information

Division of Air Pollution Control

Please complete Section 2 for the address included with this notification. If the project is an "Installation" per OAC 3745-20, complete a separate Section 2 page for each address associated with this notification.

Ohio EPA Use Only	/ Project ID	#:										
A. Facility Desc	ription									Revised?		
Building Name (if applicable): CUY-480-0.000				Site Location (specific): IR-480/IR-71 ramp over I-480 Mainline SFN 1814249								
Address: Over t	he I-480 M	ainline, Coordina	tes: 41.4205	6, -82	1.815	583						
City: Cleveland					State: OH Zip: 4413			4135 -				
Building Size (squa	are feet):			No. of Floors:				Age: 41				
Present Use: Highway Bridge					Prior Use: Highway Bridgel							
B. Type of Ope	ration (check a	all that apply)								Revised?		
Demolition	Ren	ovation/Abatement – Ty	rpe: 🗌 Remova	I 🗌	Repai	r 🗌 Encapsulat	tion 🗌 E	nclosure				
C. Asbestos Pre	esent (check o	ne)								Revised?		
🗌 Yes 🛛 🕅 No	0	No, previously abate	d Year A	bated:								
D. Approximate	e Amount of A	sbestos-Containing Mat	erials (complete	table	below	and Section 1 #6	if asbestos	is present)		Revised?		
			Material to	be Rer	noved			N	Material NOT to be Removed			
			Non-fria	ble Asl	bestos	-Containing Mate	rial	Non-fria	ble Asbestos-	Containing Material		
		RACM	Catego	ry I		Category	/	Cate	gory I	Category II		
Pipes (linear feet)			-									
Surface area on ot components (ft ²)	her facility											
Volume if length o be measured (ft ³)	r area cannot											
E. Asbestos Ab	atement Sche	dule and Abatement Sp	ecialist (original ı	notifica	ation i	s required 10 wo	rking days	prior to the s	art of work)	Revised?		
Setup Date: /	/	Abate	ment Date: /	/		Con	Complete Date: /					
(Shift 1) Time	Monda	y Tuesday	Tuesday Wednes			Thursday	sday Friday		Saturday	Sunday		
start/end on site												
Abatement Specia	list Name:		1	Certification #: AS			Expiration		Date: / /			
(Shift 1) Time	Monda	y Tuesday	Wednes	day	Thursday		Frid	Friday		Sunday		
Abdement Specialist Name: F Demolition Contractor (if applicable)						Certification #: ASExpiration Date: / /						
Name:		ippileable)										
Address: Contact Person:												
City:					State: Zip:				ip: -			
Email:					Phone: () - Fax: () -					-		
G. Demolition Schedule (original notification is required 10 working days prior to the start of work) Revised?								Revised?				
Start Date: / /				Complete Date: / /								
H. Project Hold										Revised?		
Hold Begin Date:	/ /			Work	Resun	ne Date: / ,	/					