

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

Manisha Juthani, MD  
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Governor  
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### Environmental Health & Drinking Water Branch

July 1, 2022

Mr. Chris Liberti  
Eagle Environmental, Inc.  
8 South Main Street, Suite 3  
Terryville, CT 06902

Re: Application for Approval of Alternative Work Practice at Torrington High School, 50 Major Besse Drive, Darien, CT

Dear Mr. Liberti:

This letter is in response to an application from you received on June 27, 2022, requesting approval of an alternative work practice for the removal of all interior and exterior asbestos-containing materials in conjunction with the demolition of the referenced facility. It is the understanding of the Department of Public Health Asbestos Program (DPH) that the entire facility will be demolished except for the gymnasium and two-story locker area.

Based upon the information provided in the application describing the proposed AWP to be used in the addressing conditions within the facility, approval is granted by DPH. This approval is based upon the understanding that the application requests a variance from certain requirements of the Standards for Asbestos Abatement regulation. Detailed work practices are listed below.

#### Scenario 1

In lieu of the requirements of Section 19a-332a-5(e), all work areas will be isolated from the non-work area by barriers as outlined in section 19a-332a-5(c); Using critical barriers, negative air, and decontamination unit. Critical barriers will be established at openings to the work area (including windows, doors, air vents and the like). Additionally, the use of mini- containments and spot repair procedures will be used for the removal of TSI within a non-friable removal work area. It is the understanding of DPH that friable TSI will be removed in a work area and full containment procedures shall be utilized.

1. A worker decontamination unit will be constructed at each work area where non-friable materials will be removed. The work areas shall be isolated from the non-work areas by utilizing six-mil polyethylene air-tight barriers attached securely in place at all windows, doors, and vents. Barriers will be placed on the interior of the building.



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2. Negative air filtration equipment will be installed to provide greater than one (1) air change every 15 minutes during the work. Access to the abatement work areas shall be restricted to authorized personnel afforded proper respirator protection and protective clothing. Prior to the removal of any non-friable materials in the work area, TSI shall be isolated for abated using mini-containments or spot repair procedures utilizing the following procedures.

#### Mini-Containments:

1. Once pipe runs have been located within the non-friable removal work area, a double layer of six-mil polyethylene sheeting shall be installed on all wall and floor surfaces within TSI removal areas to create a mini-containment. A separate negative air machine will be installed in each area and vented to the exterior of the building. A single step-out chamber shall be constructed at the entrance to each mini-containment.
2. At the completion of TSI removal and final cleaning within the mini-containments, a licensed Asbestos Project Monitor shall perform a visual inspection of each mini-containment. After successful visual inspection, the mini-containment shall be removed and the abatement of the non-friable materials within the work area shall begin.

#### Spot Repair:

1. Within work areas where non-friable ACM will be removed and less than 3 square feet of friable TSI is identified within a room, spot repair (glove bag) procedures will be utilized to remove the TSI prior to the removal of the non-friable ACM.
2. The AAC shall construct and perform glovebag removal in accordance with OSHA 1926.1101. The installation of the glove bags shall be performed once all non-friable work area preparation is complete. Each glove bag shall be visually inspected by a licensed Asbestos Project Monitor prior to the start of any removal. At the completion of removal, a licensed Asbestos Project Monitor shall perform a visual inspection of each glovebag. After successful visual inspection, the glove bag(s) can be evacuated, sealed, removed, and containerized as friable asbestos waste prior to the start of abatement of the non-friable materials in the work area.

#### Final Cleaning:

1. Clean-up procedures shall involve high efficiency particulate air (HEPA) filtration and wet cleaning techniques. At the completion of all abatement work, all walls, floors, ceilings and pipes where TSI has been abated shall undergo final cleaning operations. The work area shall be cleaned until no visible residue is observed in the work area.
2. Wastewater shall be filtered by best available technology prior to discharge or shall be used to further wet asbestos waste materials inside the disposal bags.
3. At the completion of all interior abatement work and final cleaning within each work area, a final visual inspection by a licensed Asbestos Project Monitor will be performed.
4. After the pre-sealant visual inspection has passed, the work area has been locked down with a bridging encapsulant, and all surfaces in the abatement area have dried, re-occupancy air clearance monitoring will be performed.

## **Scenario 2**

All exterior caulk, asbestos cement board panels, window and panel glazing compounds and caulks associated with window systems, door systems, soffits, and facades will be removed to the exterior and disposed of as regulated asbestos waste and PCB waste >50 ppm.

In lieu of the requirements of 19a-332a-5 (e and h), 19a-332a-7 (c and f) and 19a-332a-12 (a-g), the designer requests the use of work area preparation in accordance with 19a-332a-5 (a, c and f) to facilitate the removal of all interior and exterior materials associated with the window walls to the exterior. Window wall removal shall be performed only after all interior asbestos abatement work has been performed in the building section. The AAC shall perform window wall removal following the procedures outlined below:

1. In accordance with 19a-332a-5 (c), an air-tight isolation barrier consisting of a double layer of 6-mil polyethylene sheeting shall be installed on the interior of the building, from floor to ceiling, prior to window wall removal. The airtight isolation barriers shall be maintained by the AAC until all work is completed on the façade. The AAC shall post asbestos abatement warning signs and erect temporary barricades on the interior of the building to protect the isolation barriers.
2. Exterior work areas shall be regulated with four (4)-foot high orange construction fencing staked in place. The fencing shall be established around the entire exterior work area leaving no openings in the fence other than at a single access point into the work area.
3. The AAC shall install a layer of polyethylene sheeting a minimum of 6-mil thick at the perimeter of the building extending a minimum of ten (10) feet from the exterior wall of the building with an addition five (5) feet per story prior to the start of remediation work. Sheeting shall be secured to building and corners shall be staked or weighted to keep from moving.
4. The AAC shall post asbestos abatement warning signs in accordance with OSHA 29 CFR 1926.1101 and 19a-332a-5 (a). Post asbestos warning signs at twenty (20) foot intervals around the entire exterior regulated work area.
5. The AAC shall establish a remote worker decontamination system adjacent to the access point in the construction fencing.
6. The minimum specific requirements relative to the removal of interior and exterior cement board panels on facades, window, door, and panel glazing compounds and window frame caulk includes the following:
  - The AAC shall provide all lifts, scaffolding, and/or staging to access asbestos-containing materials for removal. Removal will not be permitted from ladders.
  - Prior to removal activities, mist the surfaces scheduled for removal with amended water or removal encapsulant. Maintain and utilize airless spray equipment for all exterior work.
  - Remove window trim and frame components that maintain windows and cement board panels in place. Remove fasteners and clips, where present, to free component for removal. Dispose of as regulated asbestos waste.

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- Remove cement board panels and window sashes in whole units. Do not break cement board panels or windows during removal or render the materials friable.
  - The AAC shall remove entire window sections within the frame where feasible and lower to the ground for wrapping in leak-tight containers.
  - Wrap or bag all waste in leak-tight containers and label for proper disposal. All cement board panels, window sashes, frames, trim components, etc. shall be disposed of as regulated asbestos waste.
  - Remove all caulk from within all window openings following frame removal. Wet caulk and manually remove. Do not render caulk friable during removal. There are a minimum of two (2) layers of caulk in all window and door openings.
  - Clean all layers of caulk and associated debris from window opening until no visible residue remains.
  - The AAC shall continuously remove debris and waste from ground sheeting. Do not allow waste and debris to accumulate within the regulated area. Continuously remove waste to appropriate waste container.
  - All waste shall be transported to the appropriate waste container by the end of each shift. At no time shall waste be permitted to remain within the regulated work area overnight.
  - All polyethylene sheeting shall be disposed of as asbestos contaminated waste.
  - The AAC shall final clean the ground area within the regulated area of all pre-existing debris and debris generated during abatement activities. Rake the ground surface and HEPA vacuum as needed to remove all visible debris.
7. Each work area shall be subjected to a final visual inspection by the Asbestos Project Monitor in lieu of the requirements of and 19a-332a-12

**Please note that, in accordance with the provisions of Subsection 19a-333-7(a) of the Asbestos-Containing Materials in Schools regulation, no asbestos abatement shall be performed in a school building while school is in session without the prior written approval of the DPH**

Except as noted in this letter, all other work practices specified in the Standards for Asbestos Abatement regulation are mandatory. This approval is specific for the removal of asbestos-containing materials at the facility identified in this application. This approval does not relieve the contractor or facility owner from satisfying the requirements of any other federal, state or municipal regulation. The DPH reserves the right to rescind this approval should it determine that equivalent means of asbestos emission control are not maintained.

Sincerely,



Laschone P. Garrison

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Environmental Analyst 3  
Asbestos Program