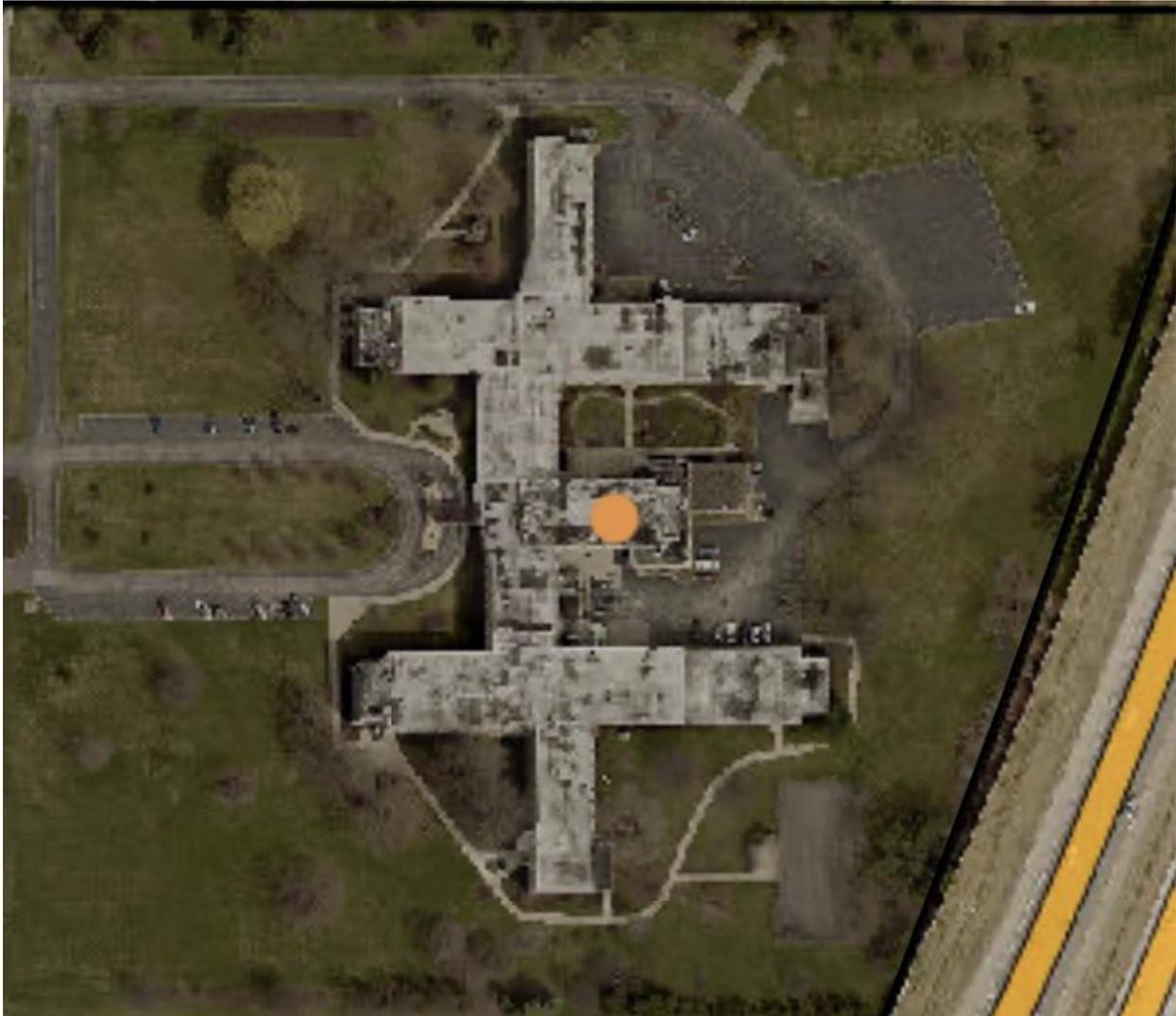


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4291 Richmond Rd, Warrenville Heights, Ohio
Analysis of Brownfields Cleanup Alternatives (ABCA)
3/24/2020
Environmental Remediation Plan

I. Introduction // Overview

Cannata Companies Ltd. is seeking to redevelop 4291 Richmond Rd, Warrensville Heights, Ohio. to meet the economic development needs of the Warrensville Heights community. The property encompasses a 227,640 square foot complex on 14.5-acres of land. The parcel for this property is 763-33-001. Redevelopment of this site requires brownfield remediation in the form of asbestos removal throughout the existing complex, which will then be demolished to set the stage for the new redevelopment options. The site is currently occupied by a vacant and obsolete former nursing home facility. The ABCA has been prepared for use by the USEPA and Cuyahoga County Department of Development.



II. Previous Assessment

HZW Environmental Consultants (HZW) conducted a Lead-Based Paint Inspection on September 6, 2019 and an Asbestos Survey on September 20, 2019.

Based on the findings of the lead-based paint inspection, none of the 2,637 building components tested were identified as containing lead-based paint and no recommendations were being presented for consideration at the time.

Based on the findings of the asbestos survey conducted at the 4291 Richmond Rd the asbestos containing materials (ACMs) identified consisted of the following. An ACM is a material that was identified as containing greater than one (1) percent asbestos by PLM analysis. In addition, those building materials identified as containing less than one (1) percent asbestos by composite analysis and those building materials assumed to contain asbestos are also listed below and are designated as such. All ACM must be removed by an Ohio Licensed Asbestos Abatement Contractor.

- Acoustical Ceiling and Wall Plaster
- Drywall System - Soffit (>1% in Joint Compound; Composite <1)
- Drywall System – Wall, Older (>1% in Joint Compound; Composite <1)
- Drywall System – Ceiling and Wall (>1% in Joint Compound; Composite <1)
- Floor Tile – 12-inch by 12-inch, Black with White Marble Pattern
- Floor Tile and Mastic – 9-inch by 9-inch, Tan with White and Brown Steaks
- Floor Tile – 9-inch by 9-inch, Tan and Brown Checker Pattern
- Floor Tile and Mastic – 12-inch by 12-inch, Light Gray with Larger Blue and White Flakes
- Flooring Mastic Associated with 12-inch by 12-inch Floor Tile, Mauve with White/Dark Red Flakes¹
- Floor Tile and Mastic – 12-inch by 12-inch, Light Green with White and Brown Flakes
- Floor Tile – 12-inch by 12-inch, Light Gray with White and Brown Streaks
- Pipe Insulation (Steam Heat)
- Mud Fitting Insulation (Steam Heat)
- Mud Fitting Insulation (Domestic Water)
- Mud Fitting Insulation (Roof Drain)
- Tank Insulation
- Boiler Mud Insulation
- Drywall System - Soffit (>1% in Joint Compound; Composite <1)
- Drywall System – Wall, Older (>1% in Joint Compound; Composite <1)
- Drywall System – Ceiling and Wall (>1% in Joint Compound; Composite <1)
- Cove Base and Mastic (Assumed)
- Fire Door Insulation (Assumed)
- Sink Insulation (Assumed)
- Cementitious Elevator Brake Pads (Assumed)
- Rolled Asphalt Roofing (Assumed)

III. Evaluation of Cleanup Alternatives and Cost

To address contamination at 4291 Richmond Rd, three (3) different alternatives were considered, including Alternative #1: no Action, Alternative #2: Minimum Action, and Alternative #3: Maximum Action

Alternative #1 – No Action With this alternative, the Developer would take no action to remediate the Property.

1. Effectiveness –The No Action alternative would not facilitate re-use of the Property.
2. Implementability – This alternative is implementable, but would require OSHA notifications to workers.
3. Cost – There would be no cost for the No Action alternative, other than current costs associated with site security.

Alternative #2 –Minimum Action Renovation

Notify any outside contractor(s) prior to them working at the subject building of the presence of the building materials identified or assumed to contain asbestos. Contractors disturbing building materials identified or assumed to contain asbestos are required to conduct their activities in accordance with OSHA's Asbestos Standard as well as the Asbestos NESHAP/Ohio EPA Asbestos regulations.

Contract with a licensed asbestos abatement contractor in the state of Ohio prior to performing renovation activities that will disturb building materials identified or assumed to contain asbestos.

Submit the Ohio EPA "Notification of Demolition and Renovation" form to the Ohio EPA 10 business days prior to any of the following activities being performed.

- Renovation of a facility, when the amount of RACM stripped, removed, dislodged, cut, drilled, or similarly disturbed exceeds 260 linear feet on pipes or 160 square feet on other facility components or 35 cubic feet off facility components.
- Abatement at a facility, when the activity involves the removal, renovation, enclosure, repair or encapsulation of friable ACM in an amount greater than 50 linear feet on pipes or 50 square feet on other facility components.

Ensure that any renovation activities performed at the subject building are conducted in accordance with Ohio EPA and OSHA regulations.

1. Effectiveness – This alternative would be effective in making the building look brand new. The reason for this minimum renovation would be the bare minimum to make the building readily occupied by patrons.
2. Implementability – This alternative is implementable.
3. Cost – The cost of renovations associated with this work varies depending on amount of ACM being removed. Not to exceed \$1,000,000.00.

Alternative #3 –Maximum Action Demolition

Contract with a licensed asbestos abatement contractor in the state of Ohio to abate all RACMs prior to any demolition activities being performed. Drywall system that was identified as containing greater than one (1) percent asbestos in the joint compound but less than one (1) percent asbestos by composite analysis is not regulated by the OEPA and, therefore, is not required to be abated prior to the demolition activities. However, OSHA has specific handling requirements for the asbestos-containing joint compound and the demolition contractor would be required to adhere to these requirements as part of a demolition project. In addition, the demolition contractor will need to confirm with his selected landfill that they will accept waste that contains asbestos-containing materials and/or assumed asbestos-containing materials.

During the demolition activities, if any nonfriable ACM or assumed nonfriable ACM will be rendered friable, causing the material to be classified as RACM, then this material would need to be abated prior to the demolition activities being performed.

If any of the building materials located at the subject building are to be recycled (i.e., concrete) and they were identified during the asbestos survey as being covered with an asbestos-containing materials or assumed asbestos-containing material (i.e., flooring), then in order for these materials to be recycled, these materials must be abated first.

Submit the Ohio EPA “Notification of Demolition and Renovation” form to the Ohio EPA 10 business days prior to any of the following activities being performed.

Ensure that demolition activities performed at the subject building are conducted in accordance with Ohio EPA and OSHA regulations.

1. Effectiveness – This alternative would be effective to set the stage for the new redevelopment options.
2. Implementability – This alternative is implementable.
3. Cost – The cost of removing of ACM and cleaning up site is approximately \$1,000,000.00.

Cleanup Alternatives Cost

1. There will be no costs under Alternative #1: No Action
2. It is estimated that Alternative #2: Minimum Action Renovation cost varies depending on amount of ACM being removed. Not to exceed \$1,000,000.00.
3. It is estimated that Alternative #3: Maximum Action Demolition: \$1,000,000.00

IV. Recommendation

Based on project size, time, cost, intended future Property use and planned construction/end use requirements Alternative 1: No Action cannot be recommended since it does not address site risks.

Alternative #2 Renovation – The alternative was deemed appropriate because it goes beyond the what is required of the developer. This methodology would yield a result that would look professional and like a modern renovation. I cannot recommend alternative 2 because its limits the redevelopment opportunities and it does not has to remove all the asbestos containing material.

Alternative #3 Demolition – This alternative is the recommended clean-up alternative. With this alternative all the asbestos containing materials will be removed from the building. This creates an environment that would prevent any further environmental risk. Once the property is demolished it set the stage for the new redevelopment options to meet the economic development needs of the Warrensville Heights community.

V. Applicable Regulations and Cleanup Standards

All work will be conducted in accordance with the Ohio EPA Voluntary Action Program Rules set forth in Ohio Administrative Code (OAC) 3745-300 and under the oversight of the Ohio EPA Division of Environmental Response and Revitalization. NTWA, LLC will obtain concurrence from the Ohio EPA to implement the clean-up work. Remediation work will be performed by NTWA, LLC AC2218, contracted by the owner which is fully qualified in all aspects of assessment and remediation. NTWA, LLC will utilize a Certified Professional licensed by Ohio EPA to oversee remediation activities and submittal of a No Further Action Letter for the Property.