

COMPANIES, INC.

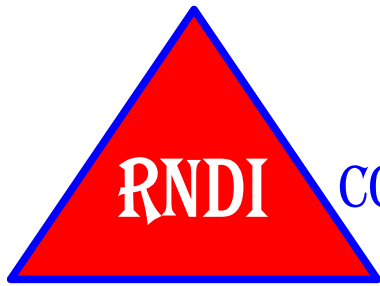
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SITE-SPECIFIC CLEANUP PLAN

Former Nursing Home – Brownfields Cleanup Project
400 W Grogan Street, Hamilton, Texas

Prepared For: City of Hamilton / EPA Brownfields Program
Prepared By: RNDI Companies, Inc.
Date: March 19, 2026



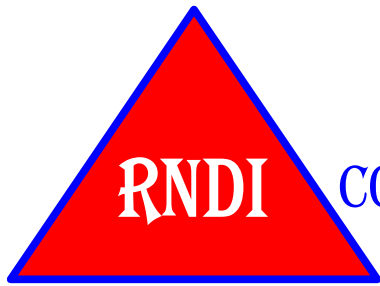


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1. PROJECT OVERVIEW

This Site-Specific Cleanup Plan defines the procedures and controls to be implemented by RNDI Companies, Inc. (RNDI) for the performance of asbestos abatement activities at the Former Nursing Home located at 400 W Grogan Street, Hamilton, Texas.

The objective of this work is the controlled removal of identified asbestos-containing materials (ACM) in a manner that minimizes the potential for fiber release and ensures proper packaging, transportation, and disposal in accordance with applicable federal and state regulations.

2. SITE DESCRIPTION

The site consists of an approximately 16,752-square-foot former nursing home facility comprised of interconnected building sections. The structure is currently vacant and secured.

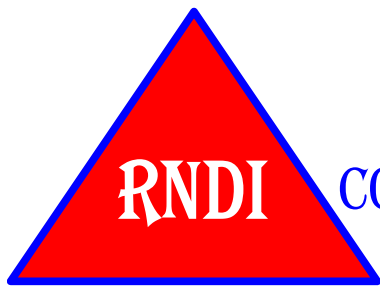
Cleanup activities are limited strictly to asbestos-containing building materials identified within the structure.

3. IDENTIFIED ASBESTOS-CONTAINING MATERIALS

Based on the asbestos survey, asbestos-containing materials (ACM) are present within the structure, including:

- Sheetrock wall and ceiling systems (joint compound and texture)
- Vinyl floor tile and associated black mastic
- Linoleum flooring within the kitchen area

These materials contain chrysotile asbestos and are distributed throughout the facility.



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4. ABATEMENT APPROACH AND METHODOLOGY

4.1 General Approach

All asbestos abatement activities will be conducted in accordance with:

- EPA NESHAP (40 CFR Part 61, Subpart M)
- Texas Asbestos Health Protection Rules (25 TAC 295)
- OSHA 29 CFR 1926.1101

All work shall be performed in accordance with the project Health and Safety Plan (HASP), which identifies site-specific hazards including structural instability, slip/trip hazards, electrical hazards, and restricted egress conditions. Personnel shall follow all HASP procedures for hazard identification and mitigation.

All asbestos-related work will be performed by appropriately licensed personnel in accordance with state requirements.

Full containment and negative pressure systems will be implemented to control airborne fiber release during all abatement activities.

4.2 Regulated Work Area Setup

Each work area will be established as a regulated containment zone:

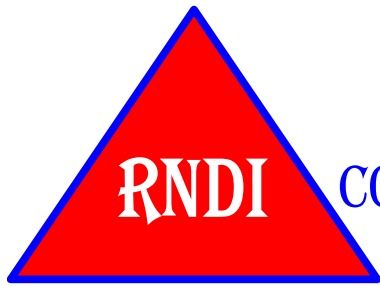
- Full containment constructed using minimum 6-mil polyethylene sheeting
- Critical barriers installed at all openings, penetrations, and access points
- All seams sealed to establish an airtight work environment

Containment systems will include a three-stage decontamination unit (decon) consisting of:

- Clean room
- Shower
- Equipment room

4.3 Negative Air Pressure Systems

- HEPA-filtered negative air machines will be operated continuously
- A minimum pressure differential of -0.02 inches water column will be maintained
- Equipment will be sized to provide appropriate air changes per hour



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- Exhaust air will be discharged in a manner that prevents re-entrainment

Pressure differential monitoring will be performed and documented at regular intervals in accordance with the HASP, with a minimum pressure of -0.02 inches water column maintained. Daily containment integrity inspections will also be conducted.

4.4 Removal Methods

All removal activities will be conducted using wet methods to minimize fiber release:

- ACM will be adequately wetted prior to disturbance
- Continuous wetting will be maintained during removal
- Removal will be performed in a controlled manner to minimize breakage

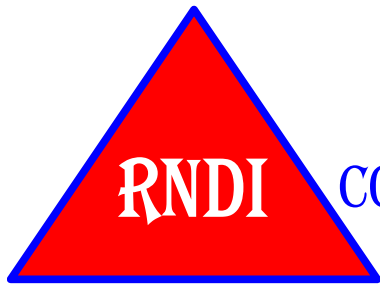
Material-Specific Methods

- **Wall and Ceiling Systems:**
Removal of asbestos-containing joint compound and textured systems with associated materials removed in sections where feasible
- **Flooring Systems:**
Removal of vinyl tile, mastic, and linoleum using wet scraping and controlled lifting techniques

All removed materials will be managed as Regulated Asbestos-Containing Material (RACM).

5. WASTE HANDLING WITHIN CONTAINMENT

- ACM waste will be immediately containerized in:
 - 6-mil asbestos-labeled bags, or
 - Double-wrapped polyethylene for larger components
- All waste will be:
 - Sealed in leak-tight containers
 - Labeled in accordance with NESHAP and DOT requirements
- Waste will exit containment through:
 - Decontamination system, or
 - Designated controlled load-out area



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Care will be taken to prevent contamination of areas outside containment during waste transfer.

Decontamination procedures, including use of a three-stage decontamination unit, PPE handling, and equipment cleaning, will be conducted in accordance with the HASP.

6. WASTE LOAD-OUT AND TRANSPORTATION

6.1 Load-Out Procedures

- Designated waste load-out routes will be established and controlled
- Exterior surfaces of waste containers will be cleaned prior to removal from containment
- Waste will be transferred to a secure staging area
- Materials will be loaded into covered roll-off containers or enclosed transport vehicles

6.2 Transportation

- Transport will be performed by licensed asbestos waste haulers
- Vehicles will be leak-tight, covered, and properly labeled
- Waste shipment records and manifests will be completed for each load

6.3 Disposal

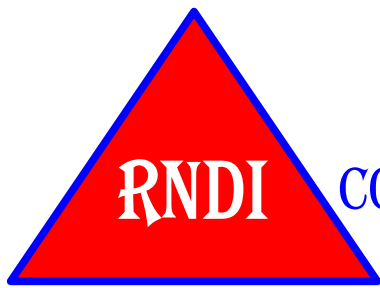
All asbestos-containing waste will be transported to:

Turkey Creek Landfill, or other TCEQ-permitted facility authorized to accept regulated asbestos-containing material (RACM), as required.

Disposal will be conducted in accordance with applicable federal and state regulations. All manifests and disposal records will be maintained as part of the project documentation.

7. AIR MONITORING AND CLEARANCE

Independent third-party air monitoring will be conducted throughout abatement activities in accordance with regulatory requirements and the project SSQAPP. All air monitoring and



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clearance sampling will be performed by an independent third-party industrial hygiene firm to maintain data integrity and quality assurance independence.

Air monitoring will include background, perimeter, and clearance sampling. Monitoring activities, action levels, and corrective actions are defined in the SSQAPP and HASP. Work will be paused if elevated fiber levels or containment failures are identified.

Containment systems will not be dismantled until clearance criteria have been achieved.

8. HEALTH AND SAFETY

A comprehensive health and safety program will be implemented consistent with OSHA and applicable regulatory requirements, including:

- Use of appropriate PPE and respiratory protection
- Worker training and licensing compliance
- Restricted access to regulated areas
- Daily safety briefings

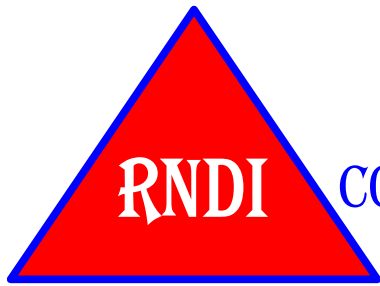
All procedures, hazard controls, training requirements, and emergency response actions are defined in the HASP and will be strictly followed.

9. TRAFFIC CONTROL AND SITE COORDINATION

Due to the nature of the work and limited anticipated impact to surrounding roadways, significant traffic disruptions are not expected.

However, traffic control measures will be implemented as necessary to ensure safe operations, including:

- Designation of controlled entry and exit points
- Coordination of waste transport activities to minimize congestion
- Use of signage, cones, or flagging personnel, as required



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All site access and vehicle movement will be managed to maintain safety for workers and the public.

Site security measures including controlled access, signage, and restricted entry will be implemented to protect the public and ensure site safety.

10. EMERGENCY RESPONSE

Emergency procedures will address:

Emergency response procedures including fiber release response, medical emergencies, containment breaches, fire events, and power failures are detailed in the HASP. All personnel will be trained on these procedures prior to work.

11. PROJECT MANAGEMENT AND OVERSIGHT

RNDI will provide qualified supervision and oversight throughout the project, including:

- Licensed asbestos supervisors
- Coordination with third-party monitoring professionals
- Regulatory compliance oversight
- Daily documentation of field activities

Project roles and responsibilities are defined in the SSQAPP and HASP and include Project Manager, Site Supervisor, Health and Safety Officer, QA Officer, and Air Monitoring Consultant.

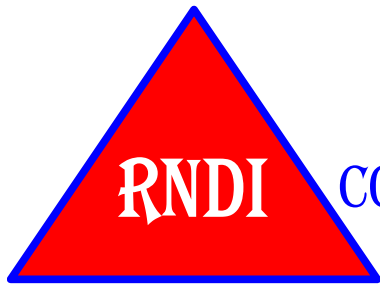
12. REGULATORY COMPLIANCE

All work will comply with:

- EPA NESHAP (40 CFR Part 61)
- Texas Asbestos Health Protection Rules (25 TAC 295)
- OSHA asbestos standards

All required notifications will be submitted prior to the commencement of work.

Cleanup activities will comply with EPA Brownfields program requirements, including document availability for public review and coordination with regulatory agencies.



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Incidental or de minimis materials encountered during cleanup activities, such as small quantities of oil containers or batteries, will be managed in accordance with applicable regulations and site-specific procedures.

13. WORK PRACTICE CONTROLS

- No eating, drinking, or smoking in regulated areas
- HEPA-filtered tools will be used where applicable
- Daily housekeeping will be maintained
- Stop-work authority is granted to ensure safety compliance

14. CONCLUSION

This Cleanup Plan outlines the approach to safely perform asbestos abatement through the use of full containment systems, negative pressure controls, and regulated waste handling procedures, ensuring protection of workers, the public, and compliance with all applicable requirements.



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SIGNATURE PAGE

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Date: April 24, 2026

Approved By:
City of Hamilton

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Date: May 7, 2026