

Analysis of Brownfield Cleanup Alternatives

Asbestos Abatement

1720 South Boulder Avenue

Tulsa, Oklahoma

City of Tulsa, Tulsa County, Oklahoma

Version 1 / Revision Date –

February 26, 2020

Prepared By:



City of Tulsa

Office of the Mayor
175 East 2nd Street, Suite 15-041
Tulsa, Oklahoma 74103
Michelle Barnett, P.E. (Deputy Chief of Economic Development)
Email: mbarnett@cityoftulsa.org
Phone: (918) 596-7457

Site History

This seven-story building was originally developed as the international headquarters of the Oral Roberts Evangelistic Association, Inc, in Tulsa, Oklahoma in 1957. By the mid-70s the activities of the Abundant Life Building were transferred to the newly constructed Oral Roberts University on South Lewis Avenue and the headquarters building at 1720 South Boulder was closed. Southwestern Bell Telephone used it for a time after it was vacated by Oral Roberts Evangelistic Association, but since the early 1980s this building has been empty.

Project Need

The building was constructed in keeping with typical construction practices and materials of the time, including the use of asbestos-containing building materials (ACBM). In the intervening years, the roof has deteriorated and allowed water damage. Vandalism and water have resulted in distribution of ACBM throughout the building, resulting in carpet, insulation and other materials being impacted. These materials are collectively referred to herein as Asbestos Containing Materials (ACM). The purpose of this analysis is to determine the most appropriate means to remove and dispose of asbestos from the structure and allow redevelopment.

Asbestos containing materials identified within the building includes:

- General rubbish,
- Fixtures and finishes,
- Fireproofing,
- Thermal insulation,
- Ceiling texture,
- Ceiling tiles,
- Vinyl floor tile and mastic,
- Contaminated carpet and padding,
- Carpet mastic,
- Contaminated fiberglass insulation,
- Contaminated sheetrock and joint compound; and
- Duct breaching.

These materials have each been determined to be regulated asbestos containing materials and are significantly damaged.

Cleanup Alternatives

Alternative 1: No Action Alternative

Alternative 1 would leave the identified ACM in place and no abatement would occur. Alternative 1 would have little effectiveness in reducing the human health and environmental hazards associated with the ACM. The current hazards would remain and would expand as site conditions deteriorate. This approach would significantly impact the ability to perform redevelopment efforts at the site. However, this alternative is easily implemented and requires no additional effort beyond the status quo.

Alternative 1 has no direct and immediate costs. Alternative 1 would incur indirect costs associated with loss of redevelopment opportunity, potential regulatory fines, and potential legal liability. These costs are difficult to estimate but could easily reach in the hundreds of thousands of dollars over the life of the structure.

Alternative 2: Asbestos Containing Building Materials (ACBM) Abatement Only Alternative

Alternative 2 would abatement ACBM and would leave ACM in place. Alternative 2 would have moderate effectiveness in reducing the human health and environmental hazards associated with the ACM, while it would abatement ACBM. The current hazards present in ACM, as a result of vandalism and water damage, would remain and would expand as site conditions deteriorate. Furthermore, this approach would significantly impact the ability to perform redevelopment efforts at the site. Abating ACBM while leaving ACM in place would be difficult and may not be technically feasible.

Alternative 2 has a direct cost similar to Alternative 3, in the range of \$2,000,000; however, the building would remain unusable due to the contamination of other materials in the building. Alternative 2 would incur indirect costs associated with loss of redevelopment opportunity, potential regulatory fines, and potential legal liability associated with the remaining ACM similar to Alternative 1.

Alternative 3: Full Abatement Alternative

Alternative 3 would abate all ACM, leaving the building ready for redevelopment. Alternative 3 would be effective in reducing the human health and environmental hazards associated with the ACM. The current hazards would be abated and would not further impact the ability to perform redevelopment efforts at the site. This alternative is technically feasible.

Alternative 3 has an estimated cost of \$2,111,138. Alternative 3 would avoid potential indirect costs associated with loss of redevelopment opportunity, potential regulatory fines, and potential legal liability.

The following tasks provide an effective means of organizing abatement project activities and have been used successfully on other similar abatement projects.

Task 1: Compliance and Loan Documents: The owner would put into place this Analysis of Brownfield Cleanup Alternatives (ABCA), the Community Relations Plan (CRP), and the Quality Assurance Project Plan (QAPP). These documents, as well as previous asbestos survey information, would be placed into a publicly accessible Administrative Record in the City/County library. Loan documents would be finalized and executed by both the City of Tulsa and the Owner.

Task 2: Project Design and Permitting: The removal, repair, or encapsulation of regulated asbestos containing material requires that the removal and training requirements of OSHA 29 Code of Federal Regulations (CFR) 1926.1101, the Oklahoma Department of Labor (DOL) Friable Asbestos Rules, and the Oklahoma Department of Environmental Quality (ODEQ) asbestos rules be followed. In Oklahoma, asbestos abatement is overseen and regulated by the Oklahoma DOL.

An Asbestos Abatement Project Design would be developed in compliance with Oklahoma Administrative Code (OAC) 380:50, Abatement of Friable Asbestos Materials Rules and Approved Variance. The Project Design and Bid Documents would be developed by a DOL-licensed Project Designer. The Project Design is attached to this ABCA as an exhibit. Notification would be provided to the DOL regarding pending abatement activities.

A bid package would be issued from the owner based upon the Project Design and Loan Documents. The abatement contract would address compliance with loan WBE/MBE requirements as well as Davis-Bacon regulations.

Task 3: Abatement and 3rd Party Air Monitoring: The owner would put the project out for bid and oversee the abatement work. During abatement, background interior and exterior samples would be collected in the building prior to commencement of abatement activities. Monitoring will be continued throughout abatement and will be continuous during each shift. Final wipe and air samples will be conducted upon conclusion of abatement activities.

Task 4: Project Closeout. The final inspection of the cleanup as well as review and approval of the final abatement report would be performed by the DOL. This task would include disposal of abatement waste, final inspection of the project and clearance by the DOL, final abatement reporting, and close out.

Activities to be conducted as part of the cleanup plan are shown in the table below:

Table 1: Proposed Cleanup Plan Tasks

Task Description	Implementation Schedule												
	1	2	3	4	5	6	7	8	9	10	11	12	13
1: Compliance and Loan Documents													
2: Project Design and Permitting													
3 Abatement and 3 rd Party Air Monitoring													
4: Project Closeout													

The project schedule provides for completion in 13 months. It is the intent of the Owner to begin abatement work immediately upon execution of the Loan agreement, allowing completion during Q2 2021.

Preferred Alternative

Based upon redevelopment opportunities and potential liability of no-action, the preferred alternative is the Alternative 3: Full Abatement Alternative at 1720 South Boulder Avenue.

Exhibit: Project Design

DRAFT



ASBESTOS PROJECT DESIGN

**ABUNDANT LIFE BUILDING
1720 S BOULDER AVENUE
TULSA, OKLAHOMA**

Prepared for:
Sharp Development
12 N. Boston Avenue
Tulsa, Oklahoma 74103

Enercon Project Number --SHARP--00002
December 24, 2019

Prepared By:
Enercon Services, Inc.
1601 NW Expressway, Suite 1000
Oklahoma City, Oklahoma 73118

Ben Baggett
AHERA Asbestos Project Designer OK 143990

ASBESTOS ABATEMENT PROJECT DESIGN

ABUNDANT LIFE BUILDING 1720 S BOULDER AVENUE TULSA, OKLAHOMA

Enercon Project Number: SHARP~00002

INTRODUCTION: This Project Design has been prepared by Enercon Services, Inc., to provide a prudent course of action for handling specific asbestos-containing materials associated within the structure. Protocols to be used are for compliance with governing regulations to protect workers and the environment from incidental exposure to airborne asbestos fibers during the work being performed.

PROJECT INFORMATION:

Project Name: Abundant Life Building
Description of Work/Occupancy: Removal of friable ACM and Non-friable ACM including building debris
Project Type: Pre-renovation
Contractor: Yet to be determined
Owner's Environmental Rep.: Enercon Services, Inc.

IH/Air Monitoring Firm: Enercon Services, Inc. All air samples will be collected by an experienced Asbestos Air Monitoring Technician authorized to collect and analyze air samples in Oklahoma.

Analytical Laboratory: Enercon Services, Inc., AIHA PAT Laboratory 151368. The laboratory to be used for analysis area asbestos air samples is Enercon Services, Inc., AIHA PAT Laboratory 151368. The laboratory to be used for analysis of worker asbestos air samples is left up to the contractor but Enercon Services, Inc., is willing to provide this to the contractor.

BACKGROUND/ADDITIONAL INFORMATION

The Abundant Life Building was reportedly constructed in 1957 as the headquarters of the Oral Roberts Ministries. The building was then occupied by Southwestern Bell for a brief period in the late 1970s and has remained vacant and in disrepair since that time. ENERCON understands unknown levels of contamination exists in the building the facility, particularly ACM. ENERCON further understands the roof is partially collapsed, leaking and presents a significant health hazard. The intent of this project is to safely accomplish the proper removal and disposal of ACM, asbestos-contaminated materials, fixtures and appliances including general rubbish prior to renovation. All building finish materials and contents are considered contaminated at this time.

1. REGULATORY COMPLIANCE

The specific governing regulations affecting this work include but are not limited to: 29 CFR 1926.1101 (OSHA Construction Industry Asbestos Standard), 29 CFR 1910.134 (OSHA Respiratory Protection), 40 CFR 61, Subpart M (Asbestos NESHAP), and OAC 380:50 with approved variances. Waste transport and disposal is to be performed by an Oklahoma-licensed asbestos waste transporter with a waste disposal manifest/chain of custody signed by the receiving landfill. DOT Class 9 placards are to be displayed during transportation of asbestos waste.

The contractor shall maintain a daily log showing number and name of workmen and supervisory personnel by craft physically on the job site each working day and a report of daily progress. The daily entries shall include a brief statement of the work in progress and a record of any accidents, injuries and/or safety meetings held on that day. All workmen will sign in and out during abatement operations and provide a brief description of operations performed. These logs shall be available for inspection at the job site while work is in progress. A reproducible copy of these logs shall be provided to the Owner's Representative at or before project completion. All personnel entering containment will have their current asbestos licenses onsite with them.

Contractor is responsible for required NESHAP notices to ODEQ, ODOL, and the County of Tulsa. A copy will be provided to ENERCON prior to start of the project.

2. **WORK SEQUENCING/SCHEDULING**

The pre-renovation abatement of the Abundant Life Building is being conducted in the following sequences:

- Seal and stabilize the roof system
- Phase 1 – Abate ground floor loading dock
- Phase 2 – Abate freight elevator shaft and elevator penthouse
- Demobilize to allow elevator to be renovated;
- Phase 3 – Abate Basement through Floor 6 (remainder of the building)
- Phase 4 – Abate passenger elevator shaft and elevator penthouse
-

The tentative start date is yet to be determined. The work is to be scheduled by the Abatement Contractor in coordination with Enercon Services, Inc. Work is planned for normal work hours.

3. **EGRESS AND FIRE PROTECTION**

Workers will be briefed on emergency exit procedures and the assembly point at the beginning of the work shift. In the event emergency evacuation is necessary, workers will proceed immediately to the nearest exit.

Emergency illumination shall be provided for not less than 1-1/2 hours in the event of failure of normal lighting. Emergency lighting facilities shall be arranged to provide initial illumination that is not less than an average of 1 ft.-candle and, at any point, not less than 0.1 ft.-candle, measured along the path of egress at walk surface. The emergency lighting system shall be arranged to provide the required illumination automatically in the event of any interruption of normal lighting. Where maintenance of illumination depends on changing from one energy source to another, a delay of not more than 10 seconds shall be permitted. The contractor shall install lighting at the onset of work.

The Abatement Contractor will provide a minimum of one 10 lb. ABC dry-charged fire extinguisher for every 3,000 sf of work area and outside the decon during abatement. The fire extinguisher will have a valid inspection tag and will be decontaminated upon removal from the work area.

All poly used will be rated Fire Retardant Polyethylene and meet NFPA 701-04, ASTM E84, CPAI84 or equivalent.

4. **MATERIALS TO BE ABATED:**

The following table provides a listing of known friable and non-friable ACM and percentage of asbestos to be removed. A copy of the laboratory reports for the limited sampling performed is attached.

BASE SCOPE OF WORK

Description	Percent/Type Asbestos	NESHAP Classification	Condition	Estimated Quantity (See note below)
Loading dock Gross removal, negative pressure enclosure	Assumed	RACM	Sig damaged	600 SF fireproofing
	Assumed	RACM	Sig damaged	100 SF TSI
	Assumed	RACM	Sig damaged	500 SF fireproofing and overspray
Freight elevator shaft Gross removal, negative pressure enclosure	Assumed	RACM	Sig damaged	1,000 SF fireproofing
1 st Floor Gross removal, negative pressure enclosure	Assumed	RACM	Sig damaged	16,900 SF fireproofing*
	Assumed	RACM	Sig damaged	700 SF of ceiling texturing lathe
	Assumed	RACM (Vinyl tile Cat II)	Sig damaged	14,000 SF ceiling tiles 14,000 SF vinyl floor tiles, associated mastic and carpet;
	Assumed	RACM	Sig damaged	200 LF TSI
	Assumed	RACM	Sig damaged	800 LF contaminated fiberglass ductwork insulation
	Assumed	RACM	Sig damaged	5,000 SF of contaminated sheetrock and joint compound
6 th Floor Gross removal, negative pressure enclosure	Assumed	RACM	Sig damaged	13,500 SF fireproofing
	Assumed	RACM	Sig damaged	1,000 SF of ceiling texturing lathe
	Assumed	RACM (Vinyl tile Cat II)	Sig damaged	12,000 SF ceiling tiles 12,000 SF vinyl floor tiles, associated mastic and carpet;
	Assumed	RACM	Sig damaged	400 LF TSI
	Assumed	RACM	Sig damaged	800 LF contaminated fiberglass ductwork insulation
	Assumed	RACM	Sig damaged	2,000 SF of contaminated sheetrock and joint compound

5 th Floor Gross removal, negative pressure enclosure	Assumed	RACM	Sig damaged	13,500 SF fireproofing
	Assumed	RACM	Sig damaged	300 SF of ceiling texturing lathe
	Assumed	RACM (Vinyl tile Cat II)	Sig damaged	14,000 SF ceiling tiles 14,000 SF vinyl floor tiles, associated mastic and carpet;
	Assumed	RACM	Sig damaged	200 LF TSI
	Assumed	RACM	Sig damaged	800 LF contaminated fiberglass ductwork insulation
	Assumed	RACM	Sig damaged	2,000 SF of contaminated sheetrock and joint compound
4 th Floor Gross removal, negative pressure enclosure	Assumed	RACM	Sig damaged	13,500 SF fireproofing
	Assumed	RACM	Sig damaged	300 SF of ceiling texturing lathe
	Assumed	RACM (Vinyl tile Cat II)	Sig damaged	14,000 SF ceiling tiles 14,000 SF vinyl floor tiles, associated mastic and carpet;
	Assumed	RACM	Sig damaged	200 LF TSI
	Assumed	RACM	Sig damaged	800 LF contaminated fiberglass ductwork insulation
	Assumed	RACM	Sig damaged	2,000 SF of contaminated sheetrock and joint compound
3 th Floor Gross removal, negative pressure enclosure	Assumed	RACM	Sig damaged	16,900 SF fireproofing
	Assumed	RACM	Sig damaged	300 SF of ceiling texturing lathe
	Assumed	RACM (Vinyl tile Cat II)	Sig damaged	14,000 SF ceiling tiles 14,000 SF vinyl floor tiles, associated mastic and carpet;
	Assumed	RACM	Sig damaged	200 LF TSI
	Assumed	RACM	Sig damaged	800 LF contaminated fiberglass ductwork insulation
	Assumed	RACM	Sig damaged	2,000 SF of contaminated sheetrock and joint compound

2nd Floor Gross removal, negative pressure enclosure	Assumed	RACM	Sig damaged	16,900 SF fireproofing
	Assumed	RACM	Sig damaged	1,900 SF of ceiling texturing lathe
	Assumed	RACM (Vinyl tile Cat II)	Sig damaged	14,000 SF ceiling tiles 14,000 SF vinyl floor tiles, associated mastic and carpet;
	Assumed	RACM	Sig damaged	200 LF TSI
	Assumed	RACM	Sig damaged	800 LF contaminated fiberglass ductwork insulation
	Assumed	RACM	Sig damaged	5,000 SF of contaminated sheetrock
Basement Gross removal, negative pressure enclosure	Assumed	RACM	Sig damaged	16,900 SF fireproofing
	Assumed	RACM	Sig damaged	4,000 SF of ceiling texturing lathe
	Assumed	RACM	Sig damaged	1,000 SF duct breaching
	Assumed	RACM (Vinyl tile Cat II)	Sig damaged	10,000 SF ceiling tiles 10,000 SF vinyl floor tiles, associated mastic and carpet;
	Assumed	RACM	Sig damaged	400 LF TSI
	Assumed	RACM	Sig damaged	800 LF contaminated fiberglass ductwork insulation
	Assumed	RACM	Sig damaged	8,000 SF of contaminated sheetrock and joint compound
	Assumed	RACM	Sig damaged	1,000 SF fireproofing
Passenger elevator shaft Gross removal, negative pressure enclosure	Assumed	RACM	Sig damaged	1,000 SF fireproofing

SF = SF
Sig damaged = Significantly damaged

IT IS IMPORTANT TO NOTE:

- Contents of the building, including fixtures, duct work, ceiling materials, ceiling tile grid, finish materials, trash, refuse, and all appurtenances, are contaminated with asbestos. The contractor must verify the scope of work required, as well as, the labor/materials/expenses required prior to offering a bid to perform the work. To be clear, all ACM and ACM contaminated materials at this site, both exterior and interior, must be removed in preparation for renovation. The “footprint” of floors Basement through Floor 3 is approximately 16,900 SF per floor. The “footprint” of Floor 4 through Floor 6 is approximately 13,500 SF per floor.
- It is the sole responsibility of the abatement contractor to perform selective demolition required to access and dispose ACM and ACM contaminated materials including the freight and passenger elevator cars.
- Quantity estimates are extrapolated from available drawings and site reconnaissance. It is the sole

responsibility of the abatement contractor to verify to his/her satisfaction actual quantities.

- The quantity of fireproofing materials listed only includes the approximate square footage of the floor space "footprint" containing fireproofing. The quantity does not include additional surface area due to corrugation of floor deck, fireproofed beams, columns or overspray which should also be included in the contractor's bid.
-
- It is important to note that the roof is partially collapsed, leaking, and presents a significant health hazard. ~~It is the abatement contractor's responsibility to have a qualified roofing contractor seal and stabilize the roof system prior to remediation activities.~~ JS

5. METHOD OF ABATEMENT

No ACM materials or ACM debris will be intentionally disturbed until a remote decon unit is established and operation of the air filtration device(s) initiated. Sufficient water supply or service will be required to maintain the ACM and contaminated waste in an adequately wetted state and transference of the waste into disposal containers on site.

Removal of ACM and asbestos-contaminated wastes will be performed in accordance with 380:50-17-4 (Preparation of Asbestos Abatement Work Areas) with the exception of:

380:50-17-4(2)

The HVAC system is not operating currently. All but major HVAC components will be disposed as ACM waste, remaining components will be cleaned and wrapped per 380:50-17-4(2).

380:50-17-4(4) through 380:50-17-4(9)

Majority of the interior walls and contents will be disposed as ACM waste. Poly on walls and ceilings are not feasible; walls, floors and ceiling deck will be thoroughly sprayed with a lock-down encapsulant after removal per 380:50-17-14(3).

Proposed Sequence of Abatement

1. Seal and stabilize the roof system
2. Contractor mobilize, establish remote decon, establish neg air flow/filtration;
3. Establish escape routes, direct workers on actions to take in the occurrence of an emergency evacuation;
4. Contractor to prep waste container 2 layers 6 mil reinforced, burrito wrap;
5. ODOL prep inspection;
6. Abate ground floor loading dock;
7. ODOL visual/final inspection;
8. Isolate freight elevator shaft, adjoining stairwell and lobby;
9. ~~Remove elevator car on 2nd floor, erect scaffolding;~~ JS
10. ODOL prep inspection;
11. Abate freight elevator shaft and penthouse;
12. ODOL visual/final inspection;
13. Demobilize to allow elevator to be renovated;
14. Mobilize, begin abatement of interior ACM all floors;
15. ODOL prep inspection;
16. Contractor final clean;
17. ODOL visual/final inspection;
18. Isolate passenger elevator shafts;
19. ~~Remove passenger elevator cars, erect scaffolding;~~ JS

20. ODOL prep inspection;
21. Abate passenger elevator shafts and penthouse;
22. ODOL visual/final inspection;

Notes: The ODOL may opt to waive or combine inspections at their discretion.

6. AIR MONITORING AND RESPIRATORY PROTECTION

A minimum of 1 area air monitor will be located:

- In each active abatement work area;
- Outside each significant critical barrier during active abatement;
- Immediately outside the decon clean room area;
- Along the load-out path during loadout (may be combined with an area monitor);
- At the exhaust point of any AFD or bank of AFDs.
- Personal air monitor samples will be collected on 1 out of every 4 workers (25%); or a minimum of 2 personal air samples per abatement crew.
- **Removal of ACM materials will be initiated in full-face APR respirators.**

All sample pumps will be calibrated immediately before and after sampling to a calibrated rotameter that was previously calibrated to a primary standard. Rotameters will be calibrated monthly. Blanks will be analyzed daily at a frequency of 10% or a minimum of 2 per day, whichever is more.

7. CLEARANCE SAMPLING

The building is scheduled for renovation; therefore, clearance by AHERA PCM protocol will be conducted. A minimum of five (5) samples per work area will be collected.

8. AIR FILTRATION DEVICES (AFD)

For each work area established, air filtration devices (negative air machines) will be utilized to provide a negative air pressure of 0.02" negative pressure (water pressure drop). Calculations shall be performed to determine a minimum of four (4) air changes per hour required for each established work area based on the nominal air flow of the machines used and the cubic feet of air to be changed. These calculations shall be used to determine the number of machines required for each work area.

9. CONTAINMENT METHODS

Preparation of asbestos abatement work area will in general accordance with 380:50-17-4. Critical barriers will be utilized over openings (e.g. windows, doors, exhaust vents) where feasible and where construction of the critical barrier would not be of significant hazard. No ACM materials or ACM debris will be intentionally disturbed until Phase 1 is isolated from Phase 2.

10. DECONTAMINATION SYSTEM

An attached decontamination facility (decon) under negative pressure will be used for this work. The remote decon unit will be established per 380:50-15-7 (Clean room requirements) and 380:50-15-12 (decontamination facility preparation) consisting of three chambers: a clean room, a shower and a dirty room. The airlocks for the decon unit will consist of triple 6 mil polyethylene overlapping flaps. The decon shower shall be equipped with a 5-micron waste water filter, liquid cleaning agent, non-porous shower grates and a functioning in-line water heater with capacity for 5 gallons per worker. Disposal of wastewater will be into the sanitary sewer. The temperature of the clean room and decon will be maintained above fifty (50) degrees °F during abatement activities. Decon procedures will be per 380:50-15-8 (Decontamination procedures).

11. **Soil Contamination Cleanup**
Not applicable.

12. **SPECIAL MATERIALS OR METHODS**

It is important to note that the roof is partially collapsed, leaking, and presents a significant health hazard. It is the abatement contractor's responsibility to have a qualified roofing contractor seal and stabilize the roof system prior to remediation activities.

Scaffolding and Fall Protection

Scaffolding, ladders and work platforms will be utilized, as required, during phases of the work. A portion of each planned work area will be designated (as needed) as 100% tie-off for Fall Protection. The asbestos abatement contractor will comply with 29 CFR 1926 Subpart L-Scaffolds and Subpart M-Fall Protection.

Electrical

Electric service WILL be available on-site at the time of abatement. It is the ~~abatement contractor's~~ ^{Owner's} responsibility to provide tie-in to the electrical service as performed by a licensed electrician. Lockout/tagout procedures will be used on all electrical circuits which penetrate the work area. The contractor's requirements for electric service must be accompanied with bid.

Water

Potable water WILL be available on-site at the time of abatement. Tie-in to the potable water and sewer for the scope of work is the sole responsibility of the ~~contractor~~ ^{Owner}.

Heat Stress

The contractor should monitor heat stress in general accordance with OSHA Technical Manual Section III, Chapter 4.

**Security and Perimeter Fencing of Construction Site
(TO BE PROVIDED BY OWNER)**

~~To prevent the general public from entering the construction work zone, a 6 foot temporary fence will be constructed around the perimeter of the construction site. Fencing should be locked at all times when construction personnel are not present. Signs posted on the fencing perimeter will be present to warn intruders of the safety risk at that location and the legal ramifications of trespassing.~~

13. **VARIANCES REQUESTED:**

No variances are requested at this time.

CERTIFICATION

This project design was prepared by the undersigned for compliance with applicable federal and State regulations.



Ben Baggett
Asbestos Project Designer, OKPD 143990
Attachments

12/24/2019
Date