



HAZARDOUS MATERIALS ASSESSMENT

Alma Salt Storage

Alma, PEI

Prepared For:

PEI Department of Transportation & Infrastructure
P.O. Box 2000
Charlottetown, PE

March 30, 2023

ALL-TECH Project No.: PE22400



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EXECUTIVE SUMMARY

ALL-TECH Environmental Services Limited was contracted by the PEI Department of Transportation & Infrastructure (DTI) to conduct a hazardous material assessment for the Alma Salt Storage Building located in Alma, Prince Edward Island.

The purpose of the assessment was to identify hazardous materials within the building which may require safe handling procedures and disposal requirements in accordance with their applicable regulations prior to any planned work, renovations, or demolition and to assist in the Asbestos Management Plan (AMP) of any in place asbestos containing materials (ACM).

This report has been prepared to document the identities, usages and locations of any designated substances and hazardous materials identified within the building.

The on-site assessment was conducted in December 2022. During the assessment hazardous materials including asbestos were sampled.

Based on the findings from the Hazardous Materials Assessment, the following conclusions and recommendations are presented:

A summary of the Hazardous Materials identified within the building is provided below in Table A based on our assessment as well as safe handling requirements.

Hazardous materials identified through sampling or visual assessment are noted in section 4 and are summarized in Appendix II.

| TABLE A Summary of Hazardous Materials for Management Plan Alma Salt Storage | | | |
|---|---|---|---------------------------------|
| Hazardous Materials | Description / Comments | Safe Handling Requirements | Disposal Requirements |
| SILICA | Presumed in the following building components: <ul style="list-style-type: none">• Poured or pre-cast concrete (footing base) | Trained personnel in the safe handling of silica dust and all other pertinent sections of the <i>Occupational Health and Safety Act R.S.P.E.I</i> | Regulatory approval from PEIELJ |

This summary should not be used alone. The report must be read in its entirety.



Larry Koughan, CET, CRSP
Project Principal
ALL-TECH Environmental Services Limited

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SITE / CLIENT INFORMATION

| | |
|-------------------------|--|
| Project No: | PE22400 |
| Assessment Date: | December 2022 |
| Client Name: | PEI Department of Transportation & Infrastructure |
| Address: | Alma Salt Storage Alma, PE |

1 INTRODUCTION

ALL-TECH Environmental Services Limited was contracted by the PEI Department of Transportation & Infrastructure (DTI) to conduct a hazardous material assessment for the Alma Salt Storage Building located in Alma, Prince Edward Island.

The purpose of the assessment was to identify hazardous materials within the building which may require safe handling procedures and disposal requirements in accordance with their applicable regulations prior to any planned work, renovations, or demolition and to assist in the Asbestos Management Plan (AMP) of any in place asbestos containing materials (ACM).

This report has been prepared to document the identities, usages and locations of any designated substances and hazardous materials identified within the building.

The on-site assessment was conducted in December 2022. During the assessment hazardous materials including asbestos were sampled.

1.1 SURVEY OBJECTIVES

The scope of the survey was to conduct a non-destructive assessment to identify asbestos, lead, and PCBs within the subject building as well as any other suspect hazardous materials if encountered. ALL-TECH inspected both interior and exterior spaces of the subject building to determine whether designated substances and hazardous materials were present. Representative sampling for suspect asbestos and lead paint materials was conducted as required based on industry standards and the consultant's experience.

1.2 BACKGROUND BUILDING INFORMATION

| TABLE 1 BUILDING FRAMEWORK | |
|-------------------------------|----------------------------------|
| Building Use | Salt Storage |
| Number of Floors | 1 floor |
| Total Area | Approximately 467 m ² |
| Year of Construction | 1987 |
| Structure | Concrete; Wood |
| Exterior Cladding | Asphalt shingle |
| HVAC | NA |
| Roof | Asphalt |
| Flooring | NA |
| Interior Walls | NA |
| Ceilings | NA |

NA Not Applicable

2 REGULATIONS & GUIDELINES

A summary table (Table 2) is provided for the applicable regulations, policies, codes, and / or guidelines of hazardous materials assessed for the purpose of this report. This information was used as reference to assess suspect hazardous materials and make recommendations based on the findings.

| TABLE 2 SUMMARY OF REGULATORY FRAMEWORK | |
|--|---|
| ASBESTOS | <ul style="list-style-type: none"> ▪ <i>Occupational Health and Safety Act</i> R.S.P.E.I. 1988, Cap. O-1.01 General Regulations – Part 49 (Including any amendments to May 2021). ▪ Guide to Asbestos Management, Workers Compensation Board of PEI. ▪ <i>Environmental Protection Act Chapter E-9 Waste Management Regulations</i>, Prince Edward Island ▪ Transportation of Dangerous Goods Act (TDGA) |
| LEAD | <ul style="list-style-type: none"> ▪ Hazardous Products Act ▪ Prince Edward Island Department of Environment, Labour and Justice (PEIELJ) ▪ Transportation of Dangerous Goods Act (TDGA) ▪ The Environmental Abatement Council of Canada (EACC) Lead Guideline for Construction, Renovation, Maintenance or Repair. ▪ Surface Coating Materials Regulations, SOR/2016-193, Canada Consumer Product Safety Act. |
| PCB's | <ul style="list-style-type: none"> ▪ Environmental Contaminants Act, Chlorophenyl Regulations ▪ Environment Canada – “Identification of Lamp Ballasts Containing PCB's,” report EPS 2/CC/2 (revised) August 1991 ▪ PCB Regulations, SOR/2008-273, Canadian Environmental Protection Act. |

2.1 ASBESTOS

Asbestos materials can be found in one of two forms: friable asbestos or a non-friable type. Friable asbestos material refers to material that when dry, can be crumbled, pulverized, or reduced to a powder by hand pressure. This type of asbestos material is hazardous due to its potential to become airborne, if damaged or disturbed.

Friable asbestos building products used that have been used in the past are sprayed acoustic and fire protection insulation which were installed on mechanical room ceilings, building structures, ceiling finishes, etc., and mechanical insulation on piping, tanks, boilers, vessels, etc. Some non-friable building products are vinyl acoustic floor tiles, gaskets, transite panels, piping, and shingles.

Non-friable materials if handled improperly during removal or renovations, such as cutting transite panels with an electrical tool, can cause high fiber releases.

Asbestos is classified as a hazardous material under the TDGA and must adhere to specific requirements for transfer including but not limited to waste transfer manifests and proper placards. All asbestos waste must be disposed of at an approved municipal solid waste disposal site. Recent changes from the Prince Edward Island's Department of Environment's Environmental Protection Act, Waste Resource Management Regulations have defined asbestos as "special waste" as asbestos containing materials containing 1% or greater by weight for the purpose of disposal.

All work should be carried out by personnel trained and licensed with the provincial department of the Workers Compensation Board / Occupational Health and Safety Division for asbestos abatement.

2.2 LEAD

Lead in paints is regulated under the Canadian Environmental Protection Act (CEPA) as published in Canada Gazette Part II. The lead content limit has been set to 600 mg/kg (0.06 percent by weight) for surface coating materials.

Any disturbance or removal of lead-based materials which may generate lead dust shall have to conform to the federal and provincial Occupational Health and Safety Act and Regulations. All work should be carried out by personnel trained in the safe handling of lead-based paint coatings and shall be trained in the use of respirators and be properly fit tested.

PEIELJ has established guidelines that restrict hazardous materials from municipal landfills and Construction and Demolition (C&D) waste disposal sites which potentially may migrate / leach into groundwater and cause adverse environmental impacts. Lead coated surfaces may leach from their base materials into soil and subsequent groundwater. PEIELJ has established guidelines that materials containing 1000 mg/kg or 0.1% lead by weight shall be classified as lead-based paints. If materials are

found to be above this guideline and require removal and disposal, then the materials must undergo leachate testing to assess total concentrations which could potentially leach into the ground soil and groundwater. Presently provincial requirements for lead leachate testing shall not exceed 5 mg/L. Disposal criteria for lead containing paints are based on total and leachable concentrations are as follows:

- Materials with total lead concentrations below the applicable Total guidelines can be disposed of at any C&D disposal site.
- Materials with *total lead concentrations above* the applicable Total guidelines and *leachable lead concentrations below* the applicable Leachate guidelines must be disposed of at an approved municipal solid waste landfill that has a composite liner and leachate collection system (i.e., East Prince Waste Management Facility in Wellington, PEI). A waste generator permit must first be approved and obtained by PEIELJ.
- Materials with total and leachable lead concentrations above provincial guidelines must be transported to an approved hazardous waste disposal site.

Materials with leachable lead concentrations above provincial guidelines must be manifested as dangerous goods during transport under the federal TDGA. Hazardous materials that are being disposed of out of province must comply with Interprovincial Movement of Hazardous Waste Regulations under the Canadian Environmental Protection Act (CEPA).

2.3 POLYCHLORINATED BIPHENYLS (PCB's)

In 1976, the Canadian Environment Contaminants Act passed regulations which prohibited the use of PCBs in transformer equipment. Under the same Act, the Chlorophenyl Regulations No. 1, states that PCBs cannot be used as a constituent of electrical capacitors, electrical transformers and associated electrical equipment manufactured in or imported into Canada after July 1, 1980.

There is currently no regulatory requirement to remove in-use PCBs from service. However, should suspect PCB containing light ballasts be removed from service, they should be treated as PCB waste or if confirmed to contain PCB oil in excess of 0.5 kg.

3 METHODOLOGY

The scope of work for the survey was to visually identify controlled hazardous materials for the safe handling and disposal for the on-going management of any hazardous materials identified. Where visual identification of asbestos containing materials and lead based paints were suspected but unable to be determined, samples were collected and sent to an approved laboratory for analysis.

3.1 ASBESTOS

Using standard bulk sampling methodologies, representative suspect asbestos containing materials were sampled from ceiling & wall finishes, floor coverings, located throughout the building. Samples were placed in sealed plastic bags, labelled and a chain of custody form completed to be forwarded to IATL Laboratory via courier for analysis.

The asbestos assessment involved a visual investigation of suspect materials for the presence of asbestos containing materials. If these materials were suspected to contain asbestos, a bulk sample was collected of the representative material to be analysed with Polarized Light Microscopy.

3.2 LEAD

No painted surfaces or suspect lead-based products were observed or reported at the time of the assessment.

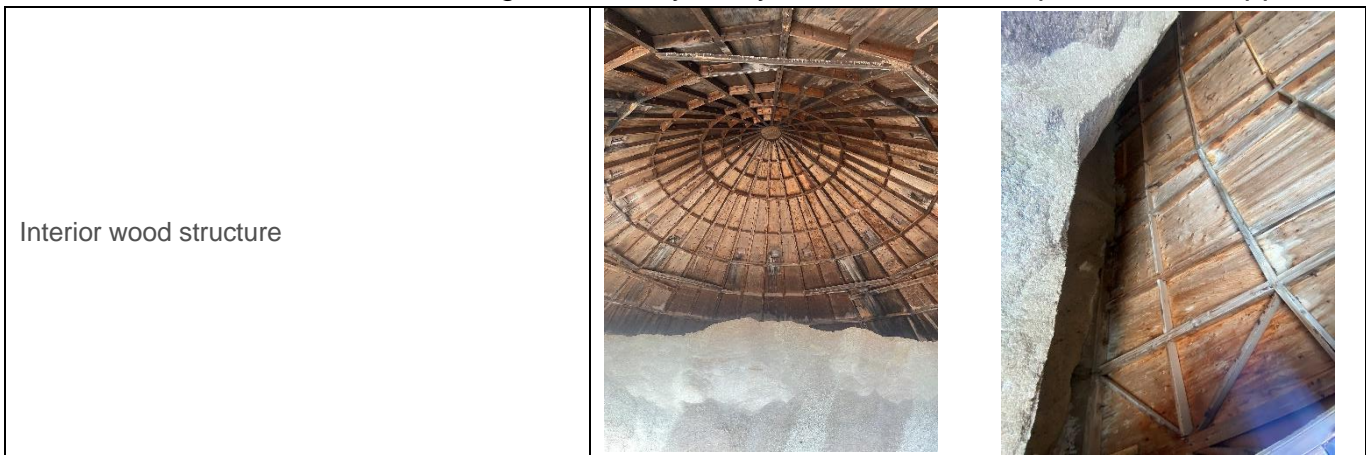
3.3 POLYCHLORINATED BIPHENYLS

No suspect lamp ballasts or electrical transformers were observed or reported at the time of the assessment.

4 ASSESSMENT FINDINGS

4.1 ASBESTOS

During the survey, no suspect materials were observed other than potential roofing materials. The consultant collected bulk material sample of the suspect ACM within the structure. The material was determined to non-asbestos containing. Laboratory analysis certificates are presented in Appendix I.



4.1.1 Building Materials

Roofing shingle and backing found to be non-asbestos containing.



4.2 SILICA

Crystalline silica is a presumed component of the following materials:

- Poured or pre-cast concrete (footing base)



5 SUMMARY OF HAZARDOUS MATERIALS

A summary of the Hazardous Materials identified within the building is provided below in Table 3 based on our assessment as well as safe handling requirements.

Hazardous materials identified through sampling or visual assessment are noted in section 4 and are summarized in Appendix II.

TABLE 3
Summary of Hazardous Materials for Management Plan
Alma Salt Storage

| <i>Hazardous Materials</i> | <i>Description / Comments</i> | <i>Safe Handling Requirements</i> | <i>Disposal Requirements</i> |
|----------------------------|---|---|---------------------------------|
| SILICA | Presumed in the following building components: <ul style="list-style-type: none"> • Poured or pre-cast concrete (footing base) | Trained personnel in the safe handling of silica dust and all other pertinent sections of the <i>Occupational Health and Safety Act R.S.P.E.I</i> | Regulatory approval from PEIELJ |

6 ON-GOING MANAGEMENT & MAINTENANCE

The following recommendations are made regarding on-going management and maintenance work involving the hazardous materials identified.

6.1 Silica

Disturbance of silica-containing products during maintenance activities may result in excessive exposures to airborne silica, especially if performed indoors and dry. Cutting, grinding, drilling or demolition of materials containing silica should be completed only with proper respiratory protection and other worker safety precautions that comply with applicable regulations and guidelines.

7 DISCLAIMER

The recommendations detailed in this report were carried out in a manner consistent with the level of care and skill normally exercised by reasonable members of the environmental and industrial hygiene consulting profession currently practicing under similar conditions in the area.

In preparing this report, ALL-TECH Environmental Services Limited relied on information supplied by others, including independent laboratories, and testing services. Except as expressly set out in this report, we have not made any independent verification of such information.

The recommendations in this report have been made in the context of existing industry accepted guidelines which were in place at the date of this report.

We trust this information is beneficial for assisting you in better understanding the process that has been carried out as well as the benefits and limitations of air sample results.

Should you have any questions or concerns pertaining to this report, please contact the undersigned directly.



Larry G. Koughan, CET, CRSP
Senior Project Consultant



APPENDIX I

Laboratory Certificate of Analysis – Asbestos PLM Samples

CERTIFICATE OF ANALYSIS

Client: ALL-TECH Environmental Services Limited
20 Duke St., Suite 109
Bedford NS B4A 2Z5

Report Date: 12/2/2022
Report No.: 673391 - PLM
Project: Alma Salt Storage
Project No.: PE22400

Client: ALL131

PLM BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 7531323
Client No.: SB-01

Analyst Observation: Red/Brown/Black Shingle
Client Description: Shingle

Location: Roof
Facility:

Percent Asbestos:
None Detected

Percent Non-Asbestos Fibrous Material:
20 Fibrous Glass

Percent Non-Fibrous Material:
80

Lab No.: 7531323(L2)
Client No.: SB-01

Analyst Observation: Red/Black/Brown Shingle
Client Description: Shingle


Location: Roof
Facility:

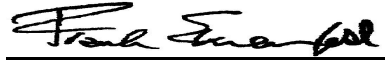
Percent Asbestos:
None Detected

Percent Non-Asbestos Fibrous Material:
15 Fibrous Glass

Percent Non-Fibrous Material:
85

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 11/28/2022
Date Analyzed: 12/02/2022
Signature: 
Analyst: David Hayes

Approved By: 
Frank E. Ehrenfeld, III
Laboratory Director

CERTIFICATE OF ANALYSIS

Client: ALL-TECH Environmental Services Limited
20 Duke St., Suite 109
Bedford NS B4A 2Z5

Report Date: 12/2/2022
Report No.: 673391 - PLM
Project: Alma Salt Storage
Project No.: PE22400

Client: ALL131

Appendix to Analytical Report

Customer Contact:

Method: 40 CFR Appendix E to Subpart E of Part 763, interim method for the Determination of Asbestos in Bulk Insulation Samples, USEPA 600, R93-116 and NYSDOH ELAP 198.1 as needed.

This appendix seeks to promote greater understanding of any observations, exceptions, special instructions, or circumstances that the laboratory needs to communicate to the client concerning the above samples. The information below is used to help promote your ability to make the most informed decisions for you and your customers. Please note the following points of contact for any questions you may have.

iATL Customer Service: customerservice@iatl.com

iATL Office Manager: wchampion@iatl.com

iATL Account Representative: Semih Kocahasan

Sample Login Notes: See Batch Sheet Attached

Sample Matrix: Bulk Building Materials

Exceptions Noted: See Following Pages

General Terms, Warrants, Limits, Qualifiers:

General information about iATL capabilities and client/laboratory relationships and responsibilities are spelled out in iATL policies that are listed at www.iATL.com and in our Quality Assurance Manual per ISO 17025 standard requirements. The information therein is a representation of iATL definitions and policies for turnaround times, sample submittal, collection media, blank definitions, quantification issues and limit of detection, analytical methods and procedures, sub-contracting policies, results reporting options, fees, terms, and discounts, confidentiality, sample archival and disposal, and data interpretation.

iATL warrants the test results to be of a precision normal for the type and methodology employed for each sample submitted. iATL disclaims any other warrants, expressed or implied, including warranty of fitness for a particular purpose and warranty of merchantability. iATL accepts no legal responsibility for the purpose for which the client uses test results. Any analytical work performed must be governed by our Standard Terms and Conditions. Prices, methods and detection limits may be changed without notification. Please contact your Customer Service Representative for the most current information.

This confidential report relates only to those item(s) tested and does not represent an endorsement by NIST-NVLAP, AIHA LAP LLC, or any agency of local, state or province governments nor of any agency of the U.S. government.

This report shall not be reproduced except in full, without written approval of the laboratory.

Information Pertinent to this Report:

Analysis by US EPA 600 93-116: Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).

Certifications:

- NIST-NVLAP No. 101165-0
- NYSDOH-ELAP No. 11021
- AIHA-LAP, LLC No. 100188

Quantification at <0.25% by volume is possible with this method. (PC) Indicates Stratified Point Count Method performed. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. PC Trace represents a <0.25% amount. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed (ex. analyze until positive instructions). Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, PLM is not consistently reliable in detecting asbestos in non-friable organically bound (NOB) materials. Quantitative transmission electron microscopy (TEM) is currently the only method that can pronounce materials as non-asbestos containing.

Analytical Methodology Alternatives: Your initial request for analysis may not have accounted for recent advances in regulatory requirements or advances in technology that are routinely used in similar situations for other qualified projects. You may have the option to explore additional analysis for further information. Below are a few options, listed as the matrix followed by the appropriate methodology. Also included are links to more information on our website.

Bulk Building Materials that are Non-Friable Organically Bound (NOB) by Gravimetric Reduction techniques employing PLM and TEM: ELAP 198.6 (PLM-NOB), ELAP 198.4 (TEM-NOB) See additional information at the end of this appendix.

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Loose Fill Vermiculite Insulation, Attic Insulation, Zonolite (copyright), etc.: US EPA 600 R-4/004 (multi-tiered analytical process)
Sprayed On Insulation/Fireproofing with Vermiculite (SOF-V): ELAP 198.8 (PLM-SOF-V)

Soil, sludge, sediment, aggregate, and like materials analyzed for asbestos or other elongated mineral particles (ex. erionite, etc.): ASTM D7521, CARB 435, and other options available

Asbestos in Surface Dust according to one of ASTM's Methods (very dependent on sampling collection technique – by TEM): ASTM D 5755, D5756, or D6480

Various other asbestos matrices (air, water, etc.) and analytical methods are available.

Disclaimers / Qualifiers:

There may be some samples in this project that have a "NOTE:" associated with a sample result. We use added disclaimers or qualifiers to inform the client about something that requires further explanation. Here is a list with highlighted disclaimers that may be pertinent to this project. For a full explanation of these and other disclaimers, please inquire at customerservice@iatl.com.

- 1) Note: No mastic provided for analysis.
- 2) Note: Insufficient mastic provided for analysis.
- 3) Note: Insufficient material provided for analysis.
- 4) Note: Insufficient sample provided for QC reanalysis.
- 5) Note: Different material than indicated on Sample Log / Description.
- 6) Note: Sample not submitted.
- 7) Note: Attached to asbestos containing material.
- 8) Note: Received wet.
- 9) Note: Possible surface contamination.
- 10) Note: Not building material. 1% threshold may not apply.
- 11) Note: Recommend TEM-NOB analysis as per EPA recommendations.
- 12) Note: Asbestos detected but not quantifiable.
- 13) Note: Multiple identical samples submitted, only one analyzed.
- 14) Note: Analyzed by EPA 600/R-93/116. Point Counting detection limit at 0.080%.
- 15) Note: Analyzed by EPA 600/R-93/116. Point Counting detection limit at 0.125%.
- 16) Note: This sample contains >10% vermiculite mineral. See Appendix for Recommendations for Vermiculite Analysis.

Recommendations for Vermiculite Analysis:

Several analytical protocols exist for the analysis of asbestos in vermiculite. These analytical approaches vary depending upon the nature of the vermiculite mineral being tested (e.g. un-processed gange, homogeneous exfoliated books of mica, or mixed mineral composites). Please contact your client representative for pricing and turnaround time options available.

iATL recommends initial testing using the EPA 600/R-93/116 method. This method is specifically designed for the analysis of asbestos in bulk building materials. It provides an acceptable starting point for primary screening of vermiculite for possible asbestos.

Results from this testing may be inconclusive. EPA suggests proceeding to a multi-tiered analysis involving wet separation techniques in conjunction with PLM and TEM gravimetric analysis (EPA 600/R-04/004).

For New York State customers, NYSDOH requires disclaimers and qualifiers for various vermiculite containing samples that direct analysis via ELAP198.6 and ELAP198.8 for samples that contain >10% vermiculite mineral where ELAP198.6 may be used to evaluate the asbestos content of the material. However, any test result using ELAP198.6 will be reported with the following disclaimer: "ELAP198.6 method does not remove vermiculite and may underestimate the level of asbestos present in a sample containing >10% vermiculite."

Further information on this method and other vermiculite and asbestos issues can be found at the following: Agency for Toxic Substances and Disease Registry (ATSDR) www.atsdr.cdc.gov, United States Geological Survey (USGS) www.minerals.usgs.gov/minerals/, US EPA www.epa.gov/asbestos. The USEPA also has an informative brochure "Current Best Practices for Vermiculite Attic Insulation" EPA 747F03001 May 2003, that may assist the health and remediation professional. NYS customers please follow current NYSDOH ELAP requirements per policy on subject of surfacing and vermiculite, May 6, 2016, Testing Requirements for Surfacing Material Containing Vermiculite (https://www.wadsworth.org/sites/default/files/WebDoc/I198_8_02_2.pdf)

The following is a summary of the analytical process outlines in the EPA 600/R-04/004 Method:

- 1) **Analytical Step/Method:** Initial Screening by PLM, EPA 600R-93/116
Requirements/Comments: Minimum of 0.1 g of sample. ~0.25% for most samples.

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Project No.: PE22400

Client: ALL131

2) **Analytical Step/Method:** Wet Separation by PLM Gravimetric Technique, EPA R-04/004
Requirements/Comments: Minimum 50g** of dry sample. Analysis of "Sinks" only.

3) **Analytical Step/Method:** Wet Separation by PLM Gravimetric Technique, EPA R-04/004
Requirements/Comments: Minimum 50g** of dry sample. Analysis of "Floats" only.

4) **Analytical Step/Method:** Wet Separation by TEM Gravimetric Technique, EPA R-04/004
Requirements/Comments: Minimum 50g** of dry sample. Analysis of "Sinks" only.

5) **Analytical Step/Method:** Wet Separation by TEM Gravimetric Technique, EPA R-04/004
Requirements/Comments: Minimum 50g** of dry sample. Analysis of "Suspension" only.

*With advance notice and confirmation by the laboratory.

**Approximately 1 Liter of sample in double-bagged container (~9x6 inch bag of sample).

New York State Department of Health requires that samples originating from NYS that they categorize as Non-friable Organically Bound materials can only be confirmed as None Detected for asbestos by method 198.4. See the table below for a list of those materials. (ENVIRONMENTAL LABORATORY APPROVAL PROGRAM CERTIFICATION MANUAL - ITEM No. 198.1, Revision Date 5/6/16)

*Asphalt Shingles, Caulking, Ceiling Tiles with Cellulose, Duct Wrap, Glazing, Mastic, Paint Chips, Resilient Floor Tiles, Rubberized Asbestos Gaskets, Siding Shingles, Vinyl Asbestos Tile, NOB materials (other than SM-V) with <10% vermiculite, Any material (Friable or NOB other than SM-V) with >10% vermiculite.


Statistically derived uncertainty with any measure should be taken into consideration when reviewing and interpreting all reported data and results. A more comprehensive listing of accuracy, precision, and uncertainty as it impacts this method is available upon request.

APPENDIX II

Summary of Hazardous Materials report

Alma Salt Storage - Summary of Hazardous Materials Report (2022)

Silica

| Room No. | Location | Sample No. | Material | Comments | Photo |
|----------|----------|------------|-----------------------|----------|---|
| NA | Exterior | NA | Concrete footing base | |  |