

**TANK DECOMMISSIONING PLAN
TANKS 201, 202, 203, 204, 205, 206, 393, 394, 395, 396, AND 397**

**TANK 396 RELEASE
FREEDOM INDUSTRIES FACILITY
CHARLESTON, WEST VIRGINIA**

Prepared For:

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CEC Project 140-256

March 7, 2014



Civil & Environmental Consultants, Inc.



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FIGURES

Figure 1 – Tank Location Plan



1.0 INTRODUCTION

On January 9, 2014, a blend of approximately 88.5% crude 4-methylcyclohexanemethanol (MCHM), 7.3% PPH (a hydrophobic glycol ether), and 4.2% water by weight was released from Tank No. 396 at the Freedom Industries (Freedom) facility in Charleston, West Virginia (the Facility) onto the Facility and into the Elk River. Freedom is proceeding with plans to investigate and remediate impacted soils and groundwater at the Facility in accordance with Order No. 8028, as amended, issued by the West Virginia Department of Environmental Protection (DEP), and to dismantle, remove, and properly manage the disposition of all above ground tanks, associated piping, machinery, and appurtenances associated with the bulk storage operations at the Facility in accordance with Consent Order No. 8034 between Freedom and DEP.

To date, initial response measures, water quality sampling, and interim remedial measures have been conducted onsite. In order to proceed with remediation and decommissioning activities, Freedom proposes to start by removing and dismantling Tanks 201, 202, 203, 204, 205, 206, 393, 394, 395, 396, and 397 (the Tanks). The Tank Decommissioning Plan (Plan) contained herein describes the general sequence of activities to be implemented to complete removal of the Tanks as well as necessary protocol to be followed by the demolition contractor throughout the project. While this document is meant as a guide and to convey some basic requirements for tank decommissioning, it is anticipated that Freedom will prepare bid documents to provide to select, qualified, contractors, and the selected contractor may, among other things, provide a written protocol explaining the means and methods by which the actual work will be completed.

The attached Figure 1 is a site plan of the Facility and indicates the location of the Tanks. It appears that this northern portion of the Facility (and the associated secondary containment) may have been added to the Facility after the initial construction. The soil/gravel fill underlying this area appears to have been used to build up the natural slope prior to expanding the secondary containment area at some time in the past. It is believed that the fill material may have been placed on top of a natural drainage way/intermittent tributary to the Elk River.



None of the materials stored in the tanks will be “hazardous waste” under either West Virginia or Federal law, so waste characterization will not be necessary.



2.0 CONTRACTOR SELECTION

With the exception of the “cleanout” work and other miscellaneous activities, Freedom anticipates retaining a demolition contractor to decommission the Tanks. Freedom expects to be able to conduct this work at no cost, or perhaps at a small profit due to the scrap value of the tanks and associated infrastructure. Freedom will attempt to solicit at least three competitive bids for the work. At least 48 hours prior to entering into any demolition contract, a notice of Freedom’s preferred demolition contractor and a copy of the bids will be provided to DEP, the representatives for the Litigation Parties per Judge Pearson’s Preservation Order of February 21, 2014, and to counsel for the Unsecured Creditors Committee.



3.0 PREPARATORY ACTIVITIES TO BE COMPLETED BY FREEDOM

3.1 ASBESTOS-CONTAINING MATERIAL SURVEY

Prior to initiating tank decommissioning activities, Freedom will retain a licensed asbestos inspector to complete an asbestos-containing material (ACM) survey of the tanks. Results of the ACM survey will be provided to the contractors as part of the bid request. Each contractor's bid will be required to include a plan for the removal, handling, and disposal of ACM prior to commencing tank demolition activities.

3.2 COMPLETE CLEANOUT OF TANKS 393 AND 394

Freedom will initiate cleanout of Tanks 393 and 394 by first securing a disposal option for fatty Acid and RDC 777 material in Tank 393 (approximately 40,000 gallons). While securing a disposal option for this material, Tank 394 will be prepared for decommissioning by removing the man-way and extracting the glycerin heel from the tank. Once the heel is removed, Tank 394 will be cleaned and readied for dismantling. Upon securing the disposal option for Tank 393's contents, the man-way will be removed and the heel will be extracted for disposal. Tank 393 will then be cleaned to prepare for dismantling.

3.3 COMPLETE CLEANOUT AND REMOVAL OF TANKS 201, 202, AND 203

Each of Tanks 201, 202, and 203 contain a small fatty acid heel. This heel will be removed for disposal before cleaning each of the tanks. Once cleaned, the tanks and associated piping will be removed for offsite disposal.



3.4 PREPARATORY WORK FOR OTHER TANKS

In order to complete preparation for tank decommissioning, Freedom will remove all electrical supply to the entire dike area. In addition, paint chips from Tanks 393, 394, and 397 will be collected and sent for laboratory analysis to identify the presence of lead based paint. Results of the lead based paint testing will be provided to the contractors during the bidding process. Finally, Tanks 204, 205, and 206 will be cleaned for dismantling.



4.0 PREPARATORY AND DECOMMISSIONING ACTIVITIES TO BE COMPLETED BY OTHERS

4.1 TANKS 204, 205, 206, 395, 396, AND 397

Freedom understands the Chemical Safety Board (CSB) will clean and sandblast Tank 396. Freedom will then coordinate with CSB for Diversified to cut a doorway into Tank 396. The selected contractor will cut the floor section from Tank 396. Assuming testing shows the presence of lead based paint, cut patterns for each tank will be water blasted in advance of cutting, and paint chips from the water blasting will be vacuumed and contained for offsite disposal. If lead based paints are not found to be present, then the tanks can simply be cut without water blasting the paint in advance.

Prior to cutting Tanks 395, 396, and 397, the selected contractor will remove the catwalk and stairs from the tanks. The contractor will then proceed with cutting tanks 395, 396, 397, 204, 205, and 206 and recycling the steel.

4.2 TANKS 393 AND 394

The selected contractor will cut each tank (using water blasting and paint chip vacuuming as necessary if testing confirms the presence of lead based paint) and transport the steel offsite for recycling.



5.0 ENVIRONMENTAL PROTECTION

For the purpose of this document, environmental protection is defined as the retention of the environment in its existing state to the extent possible. Environmental protection is the responsibility of the selected contractor and includes protection of air (including dust control), water, and property.

5.1 DUST CONTROL

The Contractor will control dust or other airborne emissions from work areas or roads wherever a dust nuisance or hazard occurs. Controls may include sprinkling or spraying with clean water in sufficient quantities to control dust emissions but not so excessive to cause runoff from work areas or roads. Use of commercial dust suppressants (other than water) must be approved by Freedom prior to their use.

5.2 STORMWATER MANAGEMENT

Removal of the tanks will expose near surface soils and may allow stormwater to contact near residual contamination. In order to mitigate the potential for stormwater infiltration after tank removal, as well as to keep stormwater runoff separate from contact with other onsite water, the Contractor shall provide impervious liner materials to cover the areas exposed during tank removal operations. The liners will be “tented” in order to direct and capture runoff on a liner to the edge of said liner. The liners shall be secured on all edges by means of sandbags or other approved methods. The Contractor shall provide a Stormwater Management Plan for approval in advance of commencing decommissioning activities.



5.3 SPILLS OR RELEASES

The Contractor will take all measures necessary to prevent the spillage or release of any hazardous materials or petroleum products to the ground surface or any surface water bodies (Elk River) and shall provide a Spill Contingency Plan prior to initiating demolition activities. Should such a spill or release occur, the Contractor will immediately notify Freedom and remediate the affected area.

5.4 BURNING

No onsite burning of waste materials will be permitted.



6.0 REGULATORY COMPLIANCE

The Contractor will be responsible for performing all Work in accordance with applicable Federal, State, and local laws and regulations. This shall include, but not be limited to, compliance with appropriate Health and Safety regulations. As such, the selected contractor must provide a Site-Specific Health and Safety Plan for completion of the onsite tank demolition activities. The Contractor shall ensure that its personnel working at the Site have all required training and medical certifications required for their positions and for performance of the work in which they are engaged. This includes any training required for persons defined as “competent persons” under applicable Occupational Safety and Health Administration (OSHA) and other regulations. All persons performing Work at the site must have completed 40-hour Hazwoper training under 29 CFR 1910.120 (including updated 8-hour refresher) The Contractor shall maintain documentation of all such training and medical certifications at the Site, with the corresponding Health and Safety Plan, for the duration of the Work.

The Contractor must also obtain all permits and registrations required for the Work by Federal, State, and local jurisdictions and agencies. The Contractor will provide copies of applications, registrations, and permits to Freedom prior to beginning the Work.

The Contractor shall possess all licenses/permits required for the Work by Federal, State, and local jurisdictions and agencies, including, but not limited to, DEP and U.S. Environmental Protection Agency (USEPA) requirements for the proper decommissioning of above-ground storage tanks (ASTs). The Contractor’s personnel shall possess any individual licenses/training required for the Work in which the person is engaged. The Contractor shall maintain copies of all such licenses/permits at the Site for the duration of the Work.



7.0 IMPLEMENTATION

Freedom anticipates starting work soon after entering into a demolition contract with the contractor. Prior to starting any field work, at least a 48-hour prior written notice will be provided to DEP, the representatives for the Litigation Parties per Judge Pearson's Preservation Order of February 21, 2014, and to counsel for the Unsecured Creditors Committee. This notice will also include the following information to be prepared by the selected contractor:

- Documentation of Regulatory Review, Permitting, and Notification Requirements;
- Project Schedule;
- Project Work Plan, likely including:
 - ACM Abatement Plan (if necessary);
 - Tank Demolition Plan;
 - Scrap Recycling Plan;
 - Waste Management & Disposal Plan;
 - Stormwater Management Plan;
 - Spill Contingency Plan;
 - Air Monitoring Plan; and
 - Project-Specific Health & Safety Plan.



FIGURE 1

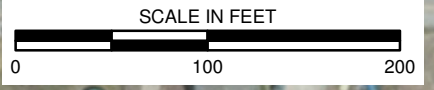


SUBMITTAL & REVISION RECORD		
NO	DATE	DESCRIPTION
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LEGEND

- ✕ January 2014 CRA Well Location
- ✕ Abandoned VRP Wells
- ▲ Culvert Sampling Location
- ⊙ Seep Sample Location
- New Waterline
- Culvert
- Site
- Collection Trench/Pond
- Index Contour
- - - Intermediate Contour



REFERENCE
 ESRI WORLD IMAGERY / ARCGIS MAP SERVICE:
 HTTP://GOTO.ARCGISONLINE.COM/MAPS/
 WORLD_IMAGERY,
 ACCESSED 3/7/2014, IMAGERY DATE: 2012.



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DRAWN BY:	KMC	CHECKED BY:	RCD
DATE:	03/07/2014	SCALE:	1" = 100'

**FREEDOM INDUSTRIES
 CHARLESTON, WEST VIRGINIA**

TANK LOCATION PLAN

APPROVED BY:	RCD*	FIGURE NO:	1
PROJECT NO:	140-256	* Hand signature on file	