

# AvalonBay

517 Route One South, Suite 5500, Iselin, NJ 08830  
Tel (732) 404-4800 ♦ Fax (732) 283-9101

March 6, 2014

Mr. John M. West, P.E., P.P.  
Land Use Engineer  
Municipality of Princeton  
Municipal Building  
400 Witherspoon Street  
Princeton, NJ 08540-3496

Re: **Final Summary/Submission – Demolition Plan**  
AvalonBay Communities Inc. - Former University Medical Center at Princeton

Dear Mr. West:

Enclosed please find AvalonBay's Demolition Plan for the above referenced property. The Demolition Plan consists of the following items:

- Asbestos/Demolition Plan
- Dust Monitoring Plan
- Lead Based Paint & Universal Waste Survey
- MAP-Adjoining Property Survey
- Noise Monitoring Plan
- Pre Demolition Asbestos Survey
- Site Security Fencing Plan
- Traffic Plan
- Underground Storage Tank Removal

In addition, the Demolition Plan items above are modified and/or supplemented as follows:

1 – Fencing - In the location shown on the submitted plan, all perimeter fences shall be installed 8'-0" high with fabric (green and/or black). The site fence will be secured during off work hours but there will not be a security guard or cameras.

2 – Pre-Demolition Inspection - AvalonBay has attached a map of the adjoining properties (shown in blue) which will be contacted prior to the start of demolition for a pre-existing survey. Interior and exterior pictures of these properties will be submitted to the Municipal Engineer to document any pre-existing damage, subject to permission being granted by the property owner.

3 – Noise Monitoring - Please see the attached noise monitoring plan from a third party acoustical noise consultant, Cerami Associates. The system will include four (4) noise monitors, one (1) set at each corner of the site. Data can be accessed by Cerami via a

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web based “real time” feature should the need arise. Due to the proprietary nature of the system, access from outside is limited. In addition to the “real time” access to data through Cerami, results of the noise monitoring shall be submitted to the Municipal Engineer weekly. Crushing of concrete and masonry on site shall be conducted consistent with this Demolition Plan and in accordance with the Princeton Noise Ordinance. Should at any time the concrete crushing operation result in a violation of the Princeton Noise Ordinance or dust exceedances beyond the action level that we have set in Section #4 below, then the crushing operation shall be suspended until such time as the violation or exceedance has been rectified to the reasonable satisfaction of the Municipal Engineer.

4 – Dust Monitoring and Lead Paint - As reviewed and discussed at public council hearings, one particulate air monitor will be installed proximate to and down wind of the area of work. Although there is no regulatory requirement for any additional monitoring, the demolition/asbestos contractor will add three (3) additional particulate air monitors. Please note that there are two separate types of air monitoring. One type monitors all dust particulate that gives an instantaneous alarm when particulate matter exceeds 75 micrograms per cubic meter which is half of the threshold value and will be considered the action level to stop work and perform corrective action via additional wetting or changing procedures during demolition. A weekly read-out will be provided to the Municipal Engineer for review. If one or more of the particulate air monitors registers an exceedance, AvalonBay will immediately notify the Municipal Engineer. The use of multiple particulate monitors combined with additional wetting or other appropriate changes in procedures will add an extra layer of protection to insure dust and debris, including any lead paint, are closely controlled on site. The other air sampling device to be used on site is for asbestos monitoring. See further information on asbestos procedures in Section #15 below. As to lead paint, any loose paint shall be scraped and vacuumed with HEPA equipment prior to the demolition of that portion of the structure and misting with water amended with surfactant will be performed throughout the demolition to ensure no airborne contaminants escape from the site.

5. Site Lighting - No site lighting will be erected on the property during demolition, as requested.

6. Environmental Condition of the Site - If during demolition any materials suspected of being contaminated are uncovered, the Developer will have its LSRP or its designee examine and test said materials if and as required and in accordance with the applicable environmental protocols for said materials. All material to be taken off the Property shall be identified and disposed of in accordance with applicable regulations. Testing of non-soil material shall be conducted prior to disposal if and as required by State and County regulations. AvalonBay will contact its LSRP to test any soil imported to or exported from the site. Copies of all test results shall be furnished to the Municipal Engineer.

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In its report prepared for Municipality of Princeton, Mr. Whitman has raised several issues with respect to the former incinerator at the site and suggested the following to address those issues: 1) inspecting the former incinerator room drain and sewer piping, 2) testing on the property for deposition from the former incinerator stack, 3) investigating the soil below the incinerator room, and 4) testing any environmentally suspect materials encountered during earthwork. Prior to the February 24, 2014 meeting, AvalonBay agreed to complete investigations relative items 1 and 4. Although EcolSciences and AvalonBay continue to maintain that the incinerator is not a Recognized Environmental Condition per ASTM and further investigation of the site is not required by NJDEP regulations, AvalonBay will conduct the following investigations to address the concerns raised in the Whitman report:

- a. Inspecting the Former Incinerator Room Drain - A plumbing professional will be engaged to inspect the floor drain piping present beneath the former incinerator room and in the street outside the room using video equipment under the oversight of EcolSciences. If no breaks in the piping are identified, no further investigation will be conducted. If any breaks in the piping are identified, the break locations will be marked on the ground surface and a soil boring investigation will be conducted under the oversight of EcolSciences. Specifically, one soil boring will be advanced at each break location. The boring will extend to a depth of at least one foot below the depth of the broken piping and a sample will be collected from the six-inch depth interval below the broken piping and analyzed at a NJDEP-certified laboratory for dioxins, furans, cadmium, and mercury. This testing will be done regardless of whether there is any indication of a discharge other than the break in the pipe.
- b. Test for Potential Deposition From the Former Incinerator Stack – EcolSciences will collect one sample from the grass area behind the former oxygen tank fenced area near the parking deck, a location agreed upon with Dr. Whitman and the Princeton officials present during the February 24, 2014 site walk. A second sample was also proposed in a landscaped area across from the door to the incinerator room during the site walk. However, further inspection of the exterior of the building revealed the presence of a roof drain from a portico roof that discharges to bare soil located in close proximity to the proposed second sample location. EcolSciences proposed relocating the second sample location to the discharge point of the roof drain during a March 5, 2014 telephone conversation with Dr. Whitman. Dr. Whitman indicated during the telephone conversation that the revised sample location is acceptable. Each sample will be collected from the 6-12 inch depth interval with a hand auger and submitted to a NJDEP-certified laboratory dioxins, furans, cadmium, and mercury analysis.
- c. Soil below the Incinerator Room – Upon removal of the floor drain piping during demolition, one soil sample will be collected from the six-inch depth

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interval below the invert of the floor drain pipe. The sample will be submitted to a NJDEP-certified laboratory for lead, dioxins, furans, cadmium, and mercury analysis.

d. Evidence of Environmental Contamination, Suspect Soil, or Suspect Waste Materials Encountered During Redevelopment – This issue was previously addressed in the Developer’s Agreement. Specifically, any suspect soil or suspect waste materials (including potential incinerator ash or residue) encountered will be sampled, reported to the NJDEP (if required pursuant to State law) and remediated (if applicable) in accordance with all applicable NJDEP standards and regulations.

Upon completion of the testing described above, the results will be provided to Princeton. In addition to the incinerator, Dr. Whitman raised a concern regarding the potential for polychlorinated biphenyls (PCBs) in the demolition debris. AvalonBay’s demolition contractor has assessed the material in the building to ensure proper handling and disposal. No suspected PCB containing materials were identified during this assessment. Furthermore, EcolSciences’ Phase I Environmental Site Assessment did not identify any potential sources of PCB contamination on the site. If suspected PCB containing materials or equipment are encountered during demolition, these materials will be tested to ensure proper handling and disposal, and the test results will be provided to Princeton. Also, in response to Dr. Whitman’s recommendation regarding particulate air monitoring during demolition, four air monitoring stations will be used, as per the procedures in Section # 4 above.

7 – Fire Safety - It is agreed and understood that any and all Siamese connections and hydrants will not be blocked at any time during the course of work.

8 – Witherspoon Street - AvalonBay will provide a minimum of ten (10) days notice to the Princeton Engineering Department and the Police Department prior to any planned work and shutdown of Witherspoon Street for their review and approval. There will be no need for overhead sidewalk protection. Any closures of Witherspoon Street shall be proposed during “off hours” so as not to conflict with school schedules.

9 – Site Logistics/MOB - Trained staff will be on site to act as flagmen for any trucks exiting or entering the site to ensure safe truck/pedestrian logistics and coordination. In connection with the safeguarding of the occupants of the adjacent Medical Arts Buildings, AvalonBay will advise the owner of the intended start date of any demolition activities to occur within 100 feet of its property no less than one (1) week prior to start of such work. A copy of such letter will be provided to the Municipality of Princeton. The same fencing, noise, dust and erosion control methods will be used for this area of

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work as at the rest of the demolition site. The Medical Arts Buildings will not need to be vacated.

10 – Waste Documentation - All documentation submitted to the Mercer County Waste Flow Enforcement Officer will be forwarded to the Municipal Engineer.

11 – Fueling Station and USTs - The above ground fueling station and any other above ground petroleum related facilities will be removed prior to or concurrently with the demolition of the buildings. The existing three (3) monitoring wells will be removed and sealed by a New Jersey licensed well driller with oversight by AvalonBay's LSRP prior to underground storage tank removal. All three wells are located in the same area as the tanks that are scheduled to be removed. Please see the plan included from EcolSciences for locations.

12 – On-Site Personnel - A detailed list of personnel who will be on site during demolition from AvalonBay and the demolition contractor's key staff shall be given to the Municipal Engineer. Contact information will include cell phone numbers and email addresses.

13 – Pest Control - A licensed exterminator will be engaged two (2) weeks prior to the start of any demolition work. All documentation will be forwarded to the Health Department, Engineering Department and Building Department.

14 – Runoff - The nature of the wetting process typically does not result in storm water runoff as relatively little water is to be used. That said, as an extra precaution AvalonBay will follow the Maser Consulting "SWPP" (Storm Water Protection Plan) attached. The erosion control methods identified therein will be installed prior to the commencement of demolition, i.e. silt/erosion control fence, inlet fabric protection and hay bales at inlets and catch basins.

15 – Asbestos - Please see the attached report from Environmental Waste Management Associates (EWMA). EWMA will be contacted and follow the applicable testing protocol for any materials uncovered during the course of the asbestos remediation. During the demolition process, walls, ceilings, columns and other encasements will be removed and all unforeseen material discovered during the course of such work will be sampled and tested as per applicable law and regulations, including strict DOL and DEP guidelines, as is standard practice throughout all asbestos abatement work conducted in New Jersey. Asbestos containing material on the exterior of the building has been classified as Category 1 Non-Friable Material. As a result, these exterior materials are exempt from the containment regulations that apply to friable asbestos materials as per the requirements of National Emissions Standards for Hazardous Air Pollutants (NESHAPS) 40 CFR 61.140 and NJSR 34.5 A-32 et seq. However, the standard 10-day notification assures that the Department of Labor will be conducting compliance

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inspections of the entire project. If previously undetected asbestos materials are identified to contain 1% or more of asbestos, then they will be removed in accordance with the applicable laws and regulations identified above. All asbestos containing material will be disposed through the Mercer County Improvement Authority's scale-house per NJDEP waste-flow regulations and ultimately sent to Waste Management's GROWS landfill in Morrisville, PA. One Millipore Cassette will be mounted on a calibrated pump that will be sent to a laboratory for PLM microscopy to identify all fibers that are 3 microns long with an aspect ratio of 3 to 1. If these are found to exceed the OSHA threshold value of 0.1f/cc, they will then be exposed to TEM analysis to identify the actual percentage of asbestos fibers in the sample content.

Should you have any questions or comments, please do not hesitate to contact me at your earliest opportunity.

Regards,



Jon Vogel

Vice President

CC:

Mitch Forlenza, AvalonBay Communities  
Albert Hromin, AvalonBay Communities