

Oklahoma Department of Environmental Quality
Brownfields Revolving Loan Fund Subgrant

FINAL DECISION DOCUMENT

Air Force Plant 3 Building 7

Date: March 7, 2025
To: Kelly Dixon, Division Director *KD 3-7-25*
Through: Aron Samwel, Brownfields Program Manager *A.S. 3-7-25*
From: Kasie Stambaugh, Environmental Programs Specialist
Subject: **Air Force Plant 3 Building 7 – Final Decision Document for Asbestos Abatement**
Enclosure: Letter provided by the Contractor regarding the Summary of Asbestos Containing Material

Purpose

The Oklahoma Department of Environmental Quality (DEQ) is required to issue a Final Decision Document following the thirty (30) day public comment period for the Analysis of Brownfields Cleanup Alternatives (ABCA) for DEQ's Brownfields Revolving Loan Fund (BRLF) subgrantees or borrowers (Oklahoma Administrative Code 252:221-7-10). Preparing an ABCA, or equivalent State Brownfields program document, is a requirement for DEQ's BRLF cleanup activities. The City of Tulsa owns Air Force Plant 3 Building 7 and is a DEQ BRLF subgrantee.

Background

A subgrant agreement between DEQ and the City of Tulsa for \$500,000 was executed on June 12, 2024 for the Air Force Plant (AFP) 3 Building 7 located at 2232 North Mingo Road in Tulsa, Oklahoma for an asbestos remediation (Project). The ABCA was made available for public review for thirty (30) days. During the public comment period, the ABCA was available on the following website: <https://partnertulsa.org/doing-business/retail/help-for-broken-real-estate/>; however, after the ABCA was publicly available for thirty (30) days, the website domain name changed and now documents for the Project are located at this website: <https://partnertulsa.org/doing-business/tulsa-offers-destination-commercial-and-retail/help-for-environmentally-impacted-properties/>. The public comment period for the ABCA was from September 5, 2024 through October 5, 2024 and no public comments were received.

Site History

The AFP was constructed around 1942 for the production/repair of aircraft during World War II and remained in use until 1994 when operations ceased. During the late 1900s, McDonnell Douglas – Tulsa (The Boeing Company) occupied some of the buildings; however, the majority of the buildings remained vacant. The property was eventually deeded to the City of Tulsa from the U.S. Army Corps of Engineers in 1999. The presence of asbestos containing materials has been identified throughout the building and located within the building's insulation and piping. The City of Tulsa plans to modernize and/or restore AFP 3 Building 7 and lease the space when the asbestos containing material has been properly removed. Only asbestos containing material located within the interior of the building will be remediated.

ABCA Alternatives

The ABCA proposed two (2) alternative actions which are summarized below:

Alternative Action 1

- (1) No further action and the asbestos containing building materials would be left in place.
- (2) Increase indirect costs associated with the loss of redevelopment opportunities.
- (3) Increase the potential for regulatory fines.
- (4) Increase the potential for legal liabilities.
- (5) Increase the potential of harm to human health and the environment.

Alternative Action 2

- (1) Removal and/or remediation of asbestos-containing building material.
- (2) Cost benefits associated with redevelopment opportunities.
- (3) Allows for unrestricted allowable use(s) for building use(s) and occupants.
- (4) Protect human health from asbestos associated hazards and improve environmental conditions.
- (5) Incorporates task items and associated timelines for Project completion.
- (6) Proper offsite disposal of asbestos-containing building material and final abatement report performed by the Oklahoma Department of Labor.

Green and Sustainable Remediation Measures for Selected Alternative

- (1) Consider the resilience of the remedial options to address potential adverse impacts caused by extreme weather events (i.e., adverse impacts caused by asbestos removal during weather events and/or dispersion).
- (2) Remove asbestos containing building materials to protect the environment from hazardous materials if the building is destroyed by extreme weather events.
- (3) Utilize AFP 3 Building 6 (adjoins to AFP 3 Building 7) for project staging so extreme weather events do not impose on cleanup activities.
- (4) Cleanup of asbestos containing building materials will allow for future climate resilience improvements.

ABCA Selected Alternative

The selected ABCA Alternative for the Project is Alternative Action Number 2. The selection was based on removal and/or remediation of asbestos-containing building material and protection of human health and the environment. According to the ABCA, the estimated costs are \$2,000,000. DEQ has approved up to \$500,000 for costs associated with the Project; however, the City of Tulsa has additional funds awarded/approved for the Project. It is recommended that the selected remediation be implemented in accordance with all appropriate state and federal rules and regulations. The Oklahoma Department of Labor (ODOL) is the regulatory agency responsible for the oversight of asbestos removal. The proposed action objective is to remove and properly dispose of the asbestos thereby eliminating or reducing current and future risks from potential exposure pathways to human health and the environment. DEQ will monitor the use of the funds and ensure the Project meets the BRLF program requirements.

Summary of Asbestos Containing Materials

Tables 1 and 2, below describe the asbestos containing material types and amounts. The enclosed letter provided by the Contractor explains the discrepancy of quantities in the Tables, below. All of the asbestos containing material within the building will be removed and properly disposed.

Table 1

Source: Analysis of Brownfields Cleanup Alternatives for Asbestos Abatement from Air Force Plant 3 Building 7, Tulsa, Tulsa County, Oklahoma dated August 23, 2024.

Product	Quantity	Unit
Pipe Insulation	20,300	LF
Pipe Fittings	3,500	EA
Blanket Insulation	66,350	SF

Linear Feet (LF); Square Feet (SF); Each (EA)

Table 2

Source: Project Design for Asbestos Abatement Building 7-AF Plant 3 Tulsa International Airport, Tulsa, OK dated January 14, 2025.

Product	Quantity	Unit
Pipe Insulation and associated fittings	~ 14,000	LF
Boiler Insulation	17,000	SF
Duct Insulation	9,000	SF
Tank and Vessel Insulation	2,500	SF

Linear Feet (LF); Square Feet (SF); Each (EA)

Project Schedule

The following documents and activities have been completed for the Project.

Required Document	Document Date or Status
<i>Community Involvement Plan</i>	August 23, 2024
<i>Analysis of Brownfields Cleanup Activities (ABCA)</i>	August 23, 2024
<i>30 Day Public Comment Period for ABCA</i>	Ended on October 5, 2024
<i>Quality Assurance Project Plan (QAPP)*</i>	February 24, 2025
<i>Asbestos Abatement Project Design approved by the Oklahoma Department of Labor*</i>	January 30, 2025

*A Project Design approved by the Oklahoma Department of Labor is required to be included within the QAPP.

Note: In addition to the required documents, listed above: Davis-Bacon documentation, asbestos abatement closure document(s) from the Oklahoma Department of Labor and proper offsite disposal of asbestos receipts and/or disposal records are required for the Project.



2/28/2025

Abatement Systems, Inc.
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Broken Arrow, OK 74013

To Whom It May Concern:

The discrepancy of quantities is due to multiple surveys being performed with differing quantities. We based quantities from the two surveys that we determined the most accurate quantities of current conditions. We cannot guarantee quantities of either survey since we were not the company that performed the surveys.

We utilized the quantities that you provided for the preparation of this revised design. To the best of our knowledge, these quantities should provide the abatement required to meet the project's demolition goals.

If you have any questions please feel free to contact us.

Thank you,

A handwritten signature in cursive script that reads "Daryl L. Lessin".

Daryl L. Lessin
President

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