American Integrated Services, Inc.

April 15, 2025

PLATING AREA WORK PLAN

The purpose of the following work plan is to define established processes and protocols for the decontamination and demolition of the existing plating lines and overall plating areas within the former SPS Technologies facility located at 301 Highland, Avenue, Jenkintown, PA. The work plan shall be used as a guidance for all work related in this area. In the event modifications are required due to unforeseen conditions, all revisions will be made in writing and submitted to SPS Technologies representatives for review and comment prior to execution.

Phase 1: Site Assessment & Hazard Mitigation

1. *Conduct Hazard Assessment of All Plating Lines*

   - Utilizing existing site plan and safety data sheets ("SDSs"), AIS has been able to identify all chemical hazards utilized in the plating operation, these include:
     - Cyanide, organics, acids and bases, nickel and other metals solutions, and rinseate waters with varying pH levels ranging from 2 to 7.5 throughout the facility which have already been marked on each applicable tank.
   - AIS has evaluated the structural integrity post-fire, noting any overhead hazards or unstable structures and potential do not enter areas. Based on the location of the plating lines, AIS will be able to enter the work zones and perform a pump down of all tanks. If during pump down, any areas are discovered that become unstable or pose a hazard, work will cease immediately, and SIGMA Engineering will be brought back onsite to further evaluate any concerns and modify approach and procedures as needed.

2. *Established Safety Protocols*

   - AIS shall restrict access to authorized personnel only and will have a sign in and sign out sheet at the entry to the restricted work area ("RWA").
   - Personnel shall use level B personal protective equipment ("PPE") for chemical transfers and pump downs. Personnel may downgrade PPE upon completion of chemical transfers and pump downs to Level C if authorized by onsite AIS Health and Safety Manager with splash protective outer garments and full-face respiratory protection with combo Chemical cartridges with P-100.

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- AIS will perform constant monitoring of all work zones utilizing a 5- Gas meter to monitor for Oxygen, Lower Explosive Limit, Carbon Monoxide, Hydrogen Sulfide and Volatile Organic Compounds during all chemical transfers, pump downs and cleaning.
- AIS will perform constant monitoring for Cyanides with a single gas meter set for Hydrogen Cyanide during all work within the plating facility. In the event detectable limits are found above 5ppm (50% of the OSHA PEL), all work will cease and the area will be sealed off for further assessment and work plan modification as needed.
- AIS will establish decontamination zones and emergency response equipment including neutralizing agents for each chemical being handled for a given plating line adjacent to the work area. AIS will designate (1) technician to assist with donning and doffing of PPE and to assist with Decon and or neutralization.

Phase 2: Debris Removal & Overhead Hazard Elimination

1. Prior to the chemical transfer and pump down of all products from the plating line areas, AIS's 40 hour certified HAZWOPER Technicians will clear all areas and ensure unobstructed access to each tank/area being transferred / pumped. This shall include removing any ground level debris in paths of travel as well as overhead hazards within the work areas. All debris will be moved into an open area of the plating shop and placed on 6 mil poly sheathing containment. These generated piles will be covered at the end of each shift with 6 mil poly sheathing and secured to prevent any runoff. The piles will be placed on the existing concrete slab and will remain within the footprint of the existing plating area. AIS will load these materials into lined rolled off boxes and burrito wrap with 6 mil poly for waste characterization, transportation, and offsite disposal.

Phase 3: Equipment Setup for Chemical Transfer

1. *Prepare Transfer Equipment*

- AIS will utilize chemical-resistant pumps compatible with the specific chemicals present in each tank. Once a tank has been transferred and pumped, the pump will be cleaned with water and or neutralizing applicable solution prior to transferring or pumping down the next tank. Waters will be managed with the tank waters from which pump was used to remove products from. This will prevent any potential for cross contamination and / or chemical reactions. All pumps will be outfitted with chemical resistant hoses and connected by means of cam-lock fittings secured at each fitting with pins to prevent potential leaks.

Phase 4: Chemical Transfer and Pipe Decontamination

1. *Transfer Chemicals to Secure Containers*

- AIS will utilize chemical-resistant pumps compatible with the specific chemicals present in each tank to transfer the contents of the tank into a compatible container. AIS will use separate containers for each different chemical from each plating line to prevent the potential for chemical reactions.
- Each container will be clearly labeled with the plating line, tank number, pH level, and chemical name and then prepared for transfer to the waste storage area. AIS technicians will start from one end of a plating line and remove the chemicals in their entirety from a single tank prior starting the next tank. All tanks within a plating line shall be completely pumped down and chemicals removed prior to any piping removal or decontamination.
- AIS will transfer each labeled container to the existing onsite hazardous waste storage area where the containers will be segregated by hazard class and stored for waste characterization, transportation, and offsite disposal by SPS designated waste hauler.

2. *Decontamination and Removal of Piping Systems*

- Once a plating line has had all tanks completely evacuated, AIS technicians will identify and mark out each individual process pipe remaining utilizing spray paint and / or colored flagging tape. Prior to removal, technicians shall identify low points within the pipe to create a pilot hole utilizing a non-sparking pneumatic drill. This inspection port will be installed into the top of each pipe and perform a visual inspection for any remaining product. During this phase, secondary containment shall be placed under each inspection port being installed to capture any potential liquids. If standing liquids are found within a pipe section, then all bulk liquids will be removed utilizing a chemical pump and stinger placed within the inspection port to remove all free liquids. Free liquids will be placed into appropriate containers and labeled. After the pipe section has been inspected and the technician verifies that no standing liquids remain, technicians will perform a line flushing of each pipe. This flushing will include starting at the high point of a pipe section and introducing steamed water with a high-pressure low volume pressure washer to flush the line to its low point for collection and placement into the applicable container from the tank pump down phase. Once the line has been flushed, it will be removed utilizing hand tools and cut to manageable sizes for transfer to the laydown area for segregation, loading, transportation and disposal.

Phase 5: Triple Washing of Plating Tanks

1. *Initial Rinse*

- AIS technicians will utilize a high pressure low volume steam cleaner to perform the initial rinse down of each tank with water. The rinseate generated form this phase will be collected by means of chemical pump and transferred to the identified applicable container from bulk pump down.

2. *Detergent Wash*

- Second rinse will be performed utilizing high pressure low volume steamed water with suitable detergent solution to eliminate remaining contaminants and collect rinseate and place within applicable designated container from initial bulk pump down.

3. *Final Rinse and Inspection*

- Perform a final rinse with clean high pressure low volume steamed water and collect rinseate and place within applicable designated container from initial bulk pump down.
- Perform final inspection of tank / tub to ensure all bulk residues and liquids are removed before proceeding to demolition.

Phase 6: Demolition and Removal of Plating Lines

1. *Demolition of Plating Lines*

- After completion of all chemical removal, pump downs, and cleanouts from the existing tanks and process piping, and process piping removal. AIS technicians will begin the demolition process by removing all catwalks and improvements for each plating line utilizing mini-excavators with thumbed and shear attachments. Additional support will be provided from hand labor, skid steers and hand tools. Once the plating line equipment, catwalks and ancillary improvements have been removed, AIS technicians will remove each individual tank and move to a designated area within the building footprint for processing and sizing. Sizing will be by hand with saws-all and or shear attachment on excavator depending on the make up of each tank. Once sized, the tanks and will be placed into lined roll off bins for transportation and disposal to the approved disposal facility.

2. *Final Plating Area Cleaning*

- Upon completion of demolition of all plating lines, a final cleaning will be performed of all floor spaces, trenches and pits. This will be performed by AIS technicians utilizing skid-steers and hand labor. Cleaning will commence from one side of the building and proceed in a uniform manner to ensure all floor space has been rendered free of debris and or

materials. Once completed, a final rinse down with high pressure low volume steam cleaning will occur and all rinseate will be collected, placed in appropriate containers, labeled, and sampled for purposes of waste characterization. Containers will be transferred to and stored in the onsite Hazardous Waste storage area pending characterization.

Phase 7: Waste Management and Documentation

1. *Waste Storage*

- All liquid generated waste will be stored onsite in the secure designated waste storage area. All solid waste generated will be placed in burrito wrapped roll off containers adjacent to the work area, once filled, they will be transported to the bulk waste storage area located onsite in the West parking area. Waste containers will be clearly labeled and stored based on compatibility until waste characterization and profiling has been approved, and in accordance with all applicable regulations.

2. *Proper Disposal of Waste*

- All wastes generated from the work shall be characterized for RCRA purposes. AIS will work with the appropriate permitted disposal facilities to determine additional specific sampling requirements for offsite disposal / treatment at receiving facility. AIS will ship off the plating debris and generated cleanup materials as RCRA hazardous waste based on known process of generating and prior listed waste codes (F006 & D006) regardless of sample results. All waste shall be shipped in a DOT approved sealed, burrito wrapped roll off container and hauled by a licensed Hazardous Waste Transporter to its final destination under manifesting according to applicable regulations.

3. *Maintain Comprehensive Records*

- AIS will photo document all activities of the decontamination and demolition efforts within the existing plating lines. This includes, but is not limited to, each of the activities described in Phases 2 through 6, above. Additionally all containers used will be labeled and tracked from start of use until reaching their final disposal destination. AIS will provide a weekly waste tracking log that shows all current waste generated including:

    - Type and size of each container
    - Type of waste within each container, including generation date
    - Location from which waste was generated (tank #)

- Location of waste storage onsite
- Indication of whether any samples or analysis was performed on the container
- Corresponding Manifest number for each waste item shipped

Daily documentation of all activities including:

- Photos taken of decontamination and demolition activities
- Air monitoring logs
- Personnel air sample results
- JHA / Tailgate forms
- Inspection logs
- Entry / Exit logs for Regulated Work Areas