

nmcDialysis Services Division
National Medical Care, Inc.

Memorandum

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To: Venus Mann-Aguilar
From: Gerald R. Beebe
Date: January 11, 1990
Re: O&M Program

cc: M. Halloren
E.M. Lowrie
B. Manalo
L. Park
P. Parsa, M.D.
K. Smith

You received, under separate cover from Larry Park, EPA guidelines for establishing a special Operations and Maintenance (O&M) program. You have also received a copy of a memo I sent to Larry Park asking for additional information or assistance with respect to several of the items published in the EPA guidelines.

However, there are several things that I think we can get started on.

Testing:

You received a copy of my memo dated December 7, 1989, regarding ongoing testing for asbestos fibers. Since that time, I have spoken with Dr. Parsa and he informs me that he is in agreement with our recommendations.

Therefore, please contact Kyle Bishop at R.J. Lee Group (415) 486-8319 and inform him we want to establish quarterly testing of samples using TEM (transmission electron microscopy). Such samples are to be drawn continuously and forwarded to R.J. Lee Group on a quarterly basis.

I spoke with Kyle Bishop on December 7 regarding this issue and he indicates that they will provide us with the necessary intermittent pumps, tubing, cassettes and timers in order to draw the samples for analysis. The price he quoted me on TEM testing was \$150 per sample.

We should also find out how such samples should be handled by our personnel and how they should be packaged for mailing to the laboratory at R.J. Lee Group.

Once the test results are received, they should be made available to all members of the O&M Program Committee and Larry Park.

Initial Cleanup:

Please have Mark Halloren contact our janitorial service and determine whether or not they are capable of cleaning ACM material using High Efficiency Particulate Air (HEPA) filtered vacuum equipment. It is possible that they are not, and that we will therefore have to find another vendor who specializes in such cleaning activities. We should verify that whoever does the cleaning abides by EPA requirements regarding respirators, clothing, etc. and that they properly dispose of all cleaning materials in accordance with EPA regulations. You will recall that I have asked Larry Park for further information regarding such requirements. In the meantime, however, we can begin looking for a suitable cleaning vendor.

Inspection:

We should immediately ensure that our cleaning crew is made aware of the asbestos containing materials in the building and ask their cooperation in watching for damaged ACM on the floor, countertops, or any other area when they clean the facility each night. Any such incidences should, of course, be immediately reported to you.

Building Maintenance:

We should ensure that filters in the central HVAC system are not removed until such time as we have received guidance from Larry Park as to the proper procedure for disposing of those filters. We should also make sure that individuals responsible for changing filters are aware of the proper procedure for removing them (misting with water from a spray bottle).

Although I don't believe we have any building maintenance planned for the immediate future, we should immediately suspend even minor repair work or any other activity which might cause surfacing materials to be disturbed.

Notification:

If we have any drawings of the facility in our possession, all areas containing ACM as determined by Clayton Environmental and R.J. Lee Group should be prominently noted on those drawings in the appropriate areas.

Venus Mann-Aguilar
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Notification of building inhabitants and the form that notification should take is a question currently pending with Larry Park, as you know. As soon as I've heard from him, I will notify you immediately.

If you have any questions as to what is required, please let me know.

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