

nmc Dialysis Services Division
National Medical Care, Inc.

~~bio-Medical Applications Of Los Angeles, Inc.~~

South Bay Dialysis Unit
1123 West Carson Street
Torrance, California 90502
(213) 320-4093



April 19, 1990

Mr. Tibor Horvath
Commercial Building Co.
500 E. Carson St. #206
Carson, CA 90745

Dear Mr. Horvath:

I am attaching copies of the final reports from two separate consultants regarding the asbestos found in our facility. We have been investigating various options regarding the management of this problem and have found out the following:

- The cost estimates for leaving the asbestos in place but implementing an Operations & Maintenance program range from \$32,000 to \$55,812 for the first year.
- The cost estimates for removing the material range from \$15,000 to \$21,028.

The regional personnel involved in this matter are Mr. Benny Manalo, Area Manager, and Mr. Gerald Beebe, Regional Manager; both of them may be contacted at (818)346-1828. Mr. Larry Park is the corporate contact in Waltham, MA; his phone number is (800)662-1237. Please do not hesitate to contact any of us if you have questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathleen W. Smith".

Kathleen W. Smith, R.N.
Director of Nursing

att

KWS/me

cc: Larry Park/NMC Corporate
Gerald Beebe/NMC Regional
Benny Manalo/NMC Regional

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Special Operations and Maintenance Program Bio-Medical Applications of Los Angeles, Inc.

March 1, 1990

Purpose: It has been determined through two independent environmental surveys that certain building materials at BMA Los Angeles contain asbestos. Although laboratory tests have determined that airborne asbestos fibers were well within OSHA guidelines, National Medical Care is instituting this Special Operations and Maintenance Program in order to protect the health and safety of patients, employees, and visitors of BMA Los Angeles.

Scope: The Special Operations and Maintenance Program applies to Bio-Medical Applications of Los Angeles, Inc. located at 1120 W. Carson St., Torrance, CA 90502.

Program Elements:

1. Special O&M Committee

Individuals who will be responsible for the implementation and oversight of this Special Operations and Maintenance Program are as follows:

Venus Mann-Aguilar	(Area Administrator, O&M Program Mgr)
Peter Parsa, M.D.	(Medical Director)
Kathleen Smith	(Director of Nursing Services)
Mark Halloren	(Chief Technician)
Benny Manalo	(Area Manager)

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2. Notification

- a. Appropriate signs will be posted in areas known to contain ACM in order to inform building inhabitants of the existence of asbestos in the environment.
- b. All building drawings for BMA Los Angeles will be properly marked so as to indicate the existence and specific location of ACM. The real estate and construction department at National Medical Care will be responsible for marking such drawings and forwarding a copy of each to the facility. All previous copies of building drawings not properly marked will be discarded by the Chief Technician.
- c. All outside service organizations, such as the janitorial service, having access to ACM locations will be notified in writing by the Program Manager that ACM exist in the facility. Such notification will inform outside service organizations of minimal safety precautions to be utilized when working in the facility. The facility will also provide all appropriate training to outside service employees such as proper use of respiratory equipment. Such training will be fully documented and such documentation will be maintained by the Program Manager.
- d. All employees and patients of BMA Los Angeles will be notified of the existence of ACM and of airborne fiber laboratory test results. In addition, the facility will establish a mechanism to ensure that all new

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(future) patients and employees of the facility are also so informed.

- e. All employees who work in areas known to contain ACM will be trained in precautionary measures to be employed while working in the facility. Such training will include a review of all asbestos containing materials, visual inspection methods to determine possible damage to known ACM, and proper notification procedures for discovery of damage to ACM.

3. Monitoring System:

- a. The O&M Program Manager will be responsible for scheduling quarterly testing of airborne fibers utilizing Transmission Electron Microscopy (TEM) technology.
- b. Air samples will be drawn on a continuous basis over a 3 month period and sent to a certified laboratory for analysis. The O&M Program Manager will be responsible for procuring all necessary equipment to obtain such samples.
- c. Laboratory test results of air samples will be published by the O&M Committee upon receipt and copies will be made available to facility employees and patients upon request.
- d. In the event that quarterly laboratory samples indicate airborne fibers which are in excess of OSHA standards, the facility will immediately begin conducting monthly airborne tests. In addition, the O&M Committee, in

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conjunction with NMC's Director of Safety, will consider the need to implement an abatement program to enclose, encapsulate or remove ACM from the facility.

4. Initial Cleaning:

a. The O&M Program Manager will contract with a janitorial service to clean the facility and properly remove asbestos fibers. The initial cleaning will address the following minimum requirements:

- (1) Steam-clean all carpets using High Efficiency Particulate Air (HEPA) filtered vacuum cleaners.
- (2) Spray vacuum cleaner bags with water before removal and discard such bags in sealed plastic bags in accordance with Environmental Protection Agency (EPA) regulations. Such regulations require that ACM be disposed in double-ply 6 mil plastic bags which are prominently labeled with a sign indicating "CAUTION: Asbestos Waste". Such bags are to be sealed with heavy duty tape and placed with other solid wastes for pick up and delivery to an approved waste disposal site.
- (3) Discard vacuum filters in similar manner and in accordance with EPA regulations.
- (4) HEPA vacuum all curtains, books or other similar materials which might collect asbestos fibers.

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- (5) Wet mop all non-carpeted floors. Under no circumstances are non-carpeted floors to be swept with a broom.
- (6) Wipe all shelves and other horizontal surfaces with damp cloths. Cleaning personnel must keep such cloths damp by use of a spray bottle. Under no circumstances are such shelves or other horizontal surfaces to be dusted using a dust cloth or brush.
- (7) Discard all cloths and mop heads in sealed plastic bags in accordance with EPA regulations. (see 4.a.2)
- (8) Cleaning personnel will be required to wear half-face respirators (MSHA/NIOSH approved) with disposable cartridge filters or a more substantial respirator if necessary.

5. Monthly Cleaning:

- a. The O&M Program Manager will contract with a janitorial service to clean the facility on a monthly basis to remove asbestos fibers. The monthly cleaning will address the following requirements:

- (1) Spray with water any debris found near surfacing ACM and place the debris in plastic bags using a dust pan. Rinse the pan with water in the utility sink. Report presence of debris immediately to the O&M Program Manager.

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- (2) HEPA vacuum all carpets.
- (3) Wet mop all non-carpeted areas.
- (4) Wipe all shelves and other horizontal services with damp cloths. Cloths should be kept damp by use of a spray bottle.
- (5) Dispose of all cleaning materials in accordance with EPA regulations. (see 4.a.2.)

6. Building Maintenance:

a. No building maintenance or construction will be permitted in areas known to contain ACM without the full knowledge and consent of the O&M Program Manager. In such cases where permission is granted to perform building maintenance or construction, the following minimal precautionary measures will be taken:

- (1) Containment barriers around work areas will be constructed in accordance with EPA regulations. Such regulations require that containment barriers be constructed of 6 mil polyethylene plastic sheets joined with folded seams and with sealing tape at the seams and boundaries.
- (2) All construction workers must wear appropriate clothing and safety equipment including coveralls and respirators.
- (3) All HVAC return vents in construction areas will be completely sealed until all

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construction activities are complete so as not to contaminate the ventilation system.

- (4) The entire construction area will be thoroughly cleaned (as described in Initial Cleaning and Monthly Cleaning) before the construction area is reinhabited by facility personnel.
- B. Facility personnel will avoid patching or repairing any damaged surfacing ACM. In addition, personnel are to be cautioned against hanging plants or other objects from ceilings containing ACM. Maintenance personnel will be cautioned about disturbing ACM in ceiling materials when replacing lights in light fixtures or when otherwise working around surfacing materials containing ACM.
- C. Maintenance personnel will be required to use proper precautionary methods when replacing acoustical ceiling tiles. When doing so, maintenance personnel must clear the area of all other personnel, wear the proper respirator, cover the flooring with a drop cloth and clean up the work area carefully in accordance with cleaning procedures outlined in "Initial Cleaning" and "Monthly Cleaning".
- D. Filters in the central HVAC system will be misted with water from spray bottles when removed during routine maintenance. All such filters will be disposed of in

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sealed bags in accordance with EPA regulations.

(see 4.a.2.)

7. Periodic Inspection:

The O&M Program Manager will schedule an inspection every 6 months to inspect all ACM for damage or deterioration. The inspection team will include a representative from the environmental consultant group, preferable the individual who conducted the initial environmental study. Such inspections will be fully documented and the O&M Program Manager will maintain such documentation. A copy of such inspection findings will be sent to the NMC Director of Safety.

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R007819

nmc Dialysis Services Division
National Medical Care, Inc.

Medical Applications Of Torrance, Inc.

3295 Skypark Drive
Torrance, CA 90505
(213) 539-5091

March 13, 1990

Mr. Kyle Bishop
R.J. Lee Group, Inc.
2424 6th Street
Berkley, CA 94710

RE: Operations and Maintenance Program for BMA Los Angeles

Dear Kyle:

First off, I would like to thank you and Will Harris for all of the information you have shared with us regarding the air sampling pump, miscellaneous accessories, and classes for the operations of such said equipment.

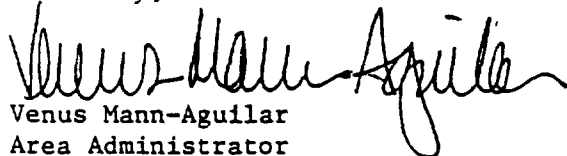
Secondly, I have enclosed a DRAFT version of the O&M Program that Jerry Beebe composed for your review and comments. Please review this document with a fine-toothed comb, and change, add or delete any information that will validate this program.

Lastly, after you have reviewed and modified this "DRAFT", please give us your opinion in terms of the committee that has been designated to monitor this program. The committee as a whole, feels strongly about the need for an additional member on the committee, i.e., a person such as yourself, Larry Park, or a designee that can be our "program expert". None of us feel qualified to manage nor oversee the functions of such a program, due to the extensive guidelines and precautions that the EPA or OSHA may require. Please let us know your opinion.

After the final program has been compiled, we will then forward it to our Corporate Offices--Larry Park, and our legal council for their approval.

Thank you for your assistance in this matter.

Sincerely,


Venus Mann-Aguilar
Area Administrator

VMA/vk

Enclosure

cc: P. Parsa, M.D.	K. Smith, R.N.
G. Beebe	M. Halloran
B. Manalo	L. Park

R007820

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March 1, 1990

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