

ENVIRONMENTAL
AFFAIRS

Industrial
Hygiene
Procedure

CONTRACTING FOR ASBESTOS ABATEMENT SERVICES

Background

Prior to any architectural, mechanical or structural renovation or demolition project, or divestiture of a [REDACTED] site or proposed acquisition of any properties, the potential impact from the presence of Asbestos-Containing Materials (ACM) must be evaluated to ensure the protection of employees and the environment. OSHA regulates asbestos abatement projects under 29 CFR 1926.58. EPA regulates asbestos through the USEPA National Emission Standards for Hazardous Air Pollutants (NESHAPS) Asbestos Regulations (40 CFR 61, Subpart M). EPA further provides guidance for the management of asbestos in buildings through its publications, which include Guidance for Controlling Asbestos-Containing Materials in Buildings (EPA 560/5-85-024), June, 1985 and the regulation of Asbestos-Containing Materials in Schools (40 CFR Part 763). Various state and local ordinances are also in effect which address the abatement of asbestos-containing materials in buildings and the licensing and training of asbestos abatement contractors, and consultants.

The purpose of this procedure is to outline what is necessary to comply with current regulations and to act in a manner consistent with corporate policies which relate to asbestos and the protection of employees and the environment.

The procedure covers two types of contracts:

1. Contracts negotiated and signed by [REDACTED] facilities.
2. Contracts negotiated and signed by Headquarters Environmental Affairs.

Contracts are administered by the group which negotiated and signed the contracts.

The requirements of this procedure apply to contracts for both asbestos project management and asbestos abatement.

General Responsibilities

This procedure assigns certain responsibilities to a Facility Asbestos Abatement Coordinator. The General/Plant Manager shall assign the Facility Asbestos Abatement Coordinator, as needed, on a project basis. The Facility Asbestos Abatement Coordinator must have or must develop a basic knowledge of asbestos abatement regulations and procedures. This Coordinator shall be responsible for facilitating communications between all

parties involved in the project and for coordinating the activities of consultants and contractors.

The Facility Asbestos Abatement Coordinator may be the individual at the site having Industrial Hygiene or Environmental Control responsibilities or a person responsible for Construction Management, Maintenance, or Works Engineering.

Headquarters Environmental Affairs is responsible for overall project review.

RESPONSIBILITIES - CONTRACTS NEGOTIATED AND SIGNED BY [REDACTED] FACILITIES

[REDACTED] FACILITY

A [REDACTED] facility with the need to contract for asbestos abatement services will:

1. Assign a qualified person to function as the Facility Asbestos Abatement Coordinator.
2. Determine, with guidance from Headquarters Environmental Affairs, whether or not to engage an asbestos environmental engineering consultant.
3. Request proposals from qualified firms.
4. Evaluate proposals with technical assistance from Headquarters Environmental Affairs, then select firms, negotiate, sign, and administer contracts.

HEADQUARTERS ENVIRONMENTAL AFFAIRS

Headquarters Environmental Affairs will:

1. Provide technical and legal assistance to the facility which is evaluating proposals and negotiating and administering contracts.
2. Review contracts (including amendments and extensions) before they are signed by the facility.

PROCEDURES - CONTRACTS NEGOTIATED AND SIGNED BY [REDACTED] FACILITIES

[REDACTED] FACILITY

The facility will:

1. Notify Headquarters Environmental Affairs/Industrial Hygiene of all proposed projects impacted by ACM.

NOTE: If an environmental engineering consultant will not be required for the project omit steps (3-7).

2. Follow the current Headquarters Industrial Hygiene Guidelines for asbestos control to develop the abatement approach.
3. Obtain a list of qualified environmental engineering consultants from Headquarters Environmental Affairs/Industrial Hygiene.
4. Prepare a Request for Proposal (RFP) for the environmental engineering consultants. The RFP shall include, as a minimum:
 - A Scope of Work which includes a site assessment and technical specifications for ACM.
 - Westinghouse terms and conditions for asbestos environmental engineering consultants services.
5. Request and receive proposals from environmental engineering consultants. Proposals should include:
 - Prices.
 - Copies of appropriate licenses and certifications as required.
 - Documentation adequate to support assertions of the firm's record of performance, insurance coverage, and financial responsibility.
 - A description of how the consultant plans to comply with Scope of Work.
6. With assistance from Headquarters Environmental Affairs:
 - Evaluate the proposals, select the consultant, negotiate and sign the contract.
 - Administer the contract.
 - Compile and maintain required project documents.
7. Obtain a list of qualified asbestos abatement contractors from Headquarters Environmental Affairs/Industrial Hygiene.
8. Prepare a RFP for the asbestos abatement contractors. The RFP shall include, as a minimum:
 - A Scope of Work which includes technical specifications and bid documents.
 - Westinghouse terms and conditions for asbestos abatement contractor services.
9. Request and receive proposals from the asbestos abatement contractors. Proposals should include:
 - Prices.
 - Copies of appropriate certification(s) and qualification(s) as required.

- Documentation adequate to support assertion of the firm's record of performance insurance coverage and financial responsibility.
 - A description of how the abatement contractor plans to comply with the Scope of Work.
10. With assistance from Headquarters Environmental Affairs:
- Evaluate the proposals, select the contractor, negotiate and sign the contract.
 - Administer the contract.
 - Compile and maintain required project documents.
11. After Environmental Affairs review, submit asbestos abatement regulatory notifications and/or permit applications to appropriate regulatory agencies.

HEADQUARTERS ENVIRONMENTAL AFFAIRS

Headquarters Environmental Affairs will:

1. Maintain a list of recommended environmental engineering consultants and asbestos abatement contractors.
2. Prepare and transmit to the facility an analysis of each proposal, including terms and conditions.
3. Provide technical and legal assistance in contract negotiation.
4. Review and approve asbestos abatement regulatory notifications and/or permit applications.
5. Confirm that bidders are adequately permitted or licensed and have an acceptable record of performance.

RESPONSIBILITIES - CONTRACTS NEGOTIATED AND SIGNED BY HEADQUARTERS ENVIRONMENTAL AFFAIRS

HEADQUARTERS ENVIRONMENTAL AFFAIRS

Headquarters Environmental Affairs will:

1. Determine whether or not to engage an asbestos environmental consultant.
2. Establish the need to contract for asbestos abatement services.
3. Obtain proposals, select firms, negotiate and sign contracts.
4. Inform the facility coordinator of the contracts, of the terms and conditions, and of the method of contract administration.

5. Provide technical, legal, and administrative services to facilities when contracts are to be coordinated locally.
6. Establish budgetary responsibility for the work

[REDACTED] FACILITY

The [REDACTED] facility will:

Identify a facility coordinator who will provide on-site assistance.

**PROCEDURES - CONTRACTS NEGOTIATED AND SIGNED
BY HEADQUARTERS ENVIRONMENTAL AFFAIRS**

HEADQUARTERS ENVIRONMENTAL AFFAIRS

Headquarters Environmental Affairs will:

Perform the appropriate steps described in the previous procedures,
**CONTRACTS NEGOTIATED AND SIGNED BY [REDACTED]
FACILITIES**

SCOPE OF WORK

ASBESTOS ABATEMENT PROJECT OVERSIGHT BY ENGINEERING CONSULTANTS

The scope of services to be provided by the engineering consultant includes but is not limited to the following:

After successfully reviewing and agreeing with [REDACTED] Terms & Conditions for consultants, the consultant will proceed as follows:

- I. Help prepare or approve any required permit application and notifications including variance requests. These must be reviewed and approved by [REDACTED] Environmental Affairs before submittal.
- II. Prepare the specification package for the contractor including bid documents, technical specifications, drawing package, if necessary, and clearance criteria. Clearance criteria shall be consistent with Federal, State, and local authority, but as a minimum the clearance air level to release contractor shall not exceed 0.01 fiber/cc with a detection limit of 0.005 fiber/cc by phase contrast microscopy (NIOSH 7400 method).
- III. If necessary, procure the contractor bids and assist in contractor selection. Final contractor selection is to be reviewed and approved by [REDACTED] Industrial Hygiene.
- IV. Provide project management/contract administration and on-site monitoring and inspection services (pre-abatement through satisfactory clearance samples). This shall include, but not be limited to, the following items:
 - o Daily phase contrast microscopy (PCM) full shift area air monitoring by NIOSH 7400 should be performed during the abatement as necessary to document that hazard conditions are controlled. A detection limit of 0.005 fibers/cc is required with a maximum flow rate of 2.5 liters/minute. If containment exists, monitoring should be performed inside and outside the containments as well as in the airlocks.
 - o Clearance air monitoring shall be by PCM unless other regulatory parameters apply. Clearance air monitoring by PCM shall have a detection limit of 0.005 fibers/cc, with a minimum volume of 3000 liters and a maximum flow rate of 2.5 liters/minute, unless other regulatory parameters apply.
 - o Daily attendance at and inspection of the worksite shall be performed to assure that regulations are conformed to by the abater and good practices are adhered to.

- o Project documentation shall be collected to include:
 - Contractor certification.
 - Notification/permits.
 - Air monitoring data.
 - Bulk monitoring data.
 - Waste manifests or disposal receipts.
 - Landfill permits.
 - Daily inspection log.
 - Final inspection report.
 - Assessment report.
 - Cost estimates.
 - Written verification or acknowledgment from the asbestos contractor and inspection/monitoring firms that the work was completed as specified and in compliance with applicable regulations. If not, what variances or episodes occurred. Any knowledge of regulatory citations or litigation arising from or related to the project must be cited.
 - A description of where and what type of asbestos abatement (removal, encapsulation, and/or enclosure) was completed and what materials were involved. Areas where total containment and/or glove bag removal techniques were employed are to be indicated.
 - The identity of the contractor and inspection/monitoring firms involved in the project, and documentation of their qualifications.
- V. The analysis of all air samples shall be performed by a laboratory accredited by the American Industrial Hygiene Association. The laboratory of first choice for the analysis of air samples shall be Clayton Environmental Consultants, Inc. Air sample evaluations shall only be performed through use of phase contract microscopy (NIOSH 7400) unless written approval to collect other type samples is received from [REDACTED]. Industrial hygiene bulk samples will not be collected during the abatement phase of the project unless specifically authorized by [REDACTED].

- VI. A Certified Industrial Hygienist with experience in asbestos abatement projects and knowledge of the EPA AHERA rules shall provide project oversight and quality assurance of all work performed.
- VII. [REDACTED] reserves the right to approve project managers and other technical personnel identified for work on the project.
- VIII. All written reports, including project specifications, shall contain a sign-off by the oversight Certified Industrial Hygienist. After this signoff, they shall be presented first in draft form to [REDACTED] Industrial Hygiene for review purposes before final documents are issued.
- IX. Four copies of all documents will be presented to our [REDACTED] representative. One copy of the documents is to be sent to [REDACTED] Industrial Hygiene. A final compliance report prepared by the consultant is to be issued at the end of the project. This report is to include their documentation previously mentioned as well as "as-built" floor plans detailing where any asbestos materials had to be left behind.
- X. All work is to be performed in compliance with the current, applicable EPA, OSHA, DOT regulations, state and local laws.
- XI. Selection of permitted landfill will be approved by [REDACTED] Environmental Affairs.

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Attachment 1

GENERIC SCOPE OF SERVICES (WORK)

for the Asbestos Assessment of the
Real Estate Complex located at

I. The scope of services to be provided includes, but is not limited to the following:

- o Perform a survey of the facility, described above, to identify the location, quantity and condition of all asbestos-containing materials.
- o Provide verbal (optional) and written assessment reports that detail the findings of the survey. The assessment is to be provided within _____ week(s) after the contract is let with a verbal report (optional) to follow within _____ week(s) after the assessment has been performed. The written assessment report is to be provided within _____ week(s) after the assessment has been performed.
- o Prepare two cost estimates. One estimate will address the removal of all asbestos-containing material, separated into a minimum of two categories for friable and non-friable.

The second estimate will describe the costs to abate hazardous conditions involving asbestos-containing materials (repair primarily, although removal, sealing, and enclosure are other viable methods) as required by site conditions.

II. The analysis of all bulk material samples shall be performed by a laboratory rated as proficient by the appropriate Bulk Asbestos Sample Quality Assurance Program specified by the E. P. A. The detection limit of the laboratory analyzing bulk samples shall be 1% or better.

The analysis of any and all Phase Contrast Microscopy (PCM) air samples shall be performed by a laboratory accredited by the American Industrial Hygiene Association. A detection limit of 0.005 fibers > 5 $\mu\text{m}/\text{cm}^3$ or better is required for PCM samples.

Any required Transmission Electron Microscopy (TEM) samples are to be analyzed by a laboratory rated proficient in an appropriate quality assurance program for this type of analysis. Use of an AIHA accredited laboratory is highly recommended for TEM samples. TEM analysis shall be performed as described in 40CFR763, subpart E.

- III. A Certified Industrial Hygienist, with experience in asbestos assessment and knowledge of EPA AHERA rules, shall provide project oversight and quality assurance of all work performed. This person will provide written documentation as to his/her participation in project oversight.

The assessment surveyor shall be certified as an asbestos hazard evaluation specialist as described in 40CFR763, subpart E.

The surveyor shall also meet any applicable local requirements for individuals conducting asbestos surveys.

- IV. All written reports are to be presented first in DRAFT form for review purposes before final documents are issued.

- V. Four copies of all documents are to be presented to our [REDACTED] representative: _____.

- VI. All work is to be performed in compliance with all current applicable federal, state, and local regulations.

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[REDACTED]
[REDACTED]
[REDACTED]
ASBESTOS ABATEMENT PROGRAM GUIDELINES

INTRODUCTION

These guidelines offer specific technical information for compliance with current regulations that apply to the management of architectural asbestos in industrial settings owned by [REDACTED]
[REDACTED]

As a first principle, all current applicable governmental (federal, state, local, and others) regulations are to be met. These include the following federal regulations:

- 29CFR1926.58
- 29CFR1910.1001
- 40CFR61, Subpart M (NESHAPS)
- 49CFR172 (DOT marking requirements)

Secondly, the voluntary appendices of the OSHA construction standard for asbestos 29CFR1926.58 are to be met.

Lastly, consultation with Corporate Industrial Hygiene should precede the initiation of any asbestos abatement project within [REDACTED]

Through this consultation specific guidelines, which we recommend that you follow, will be clarified as necessary.

OVERVIEW

Asbestos abatement always involves the following objectives:

- assessment
- hazard control.

A facility asbestos abatement coordinator, if properly qualified, can carry out these objectives. This coordinator can elect, with consultation from Corporate Industrial Hygiene whether or not it is necessary to engage an environmental consultant to carry out these objectives under the coordinator's supervision.

The facility asbestos abatement coordinator has the responsibility to perform the following functions:

- Pre-quality abaters.

- Prepare project specifications.
- Monitor work site for compliance.
- Collect air and bulk samples.
- Coordinate any required Westinghouse worker training.
- Insure compliance with hazard communication regulations pertaining to contractors.
- Coordinate worker personal protective equipment programs; e.g., respirators, coveralls, lab coats.
- Coordinate the use of engineering controls; e.g., glove bags, enclosures, exhaust ventilation, wet removal, and HEPA vacuum cleaners.
- Coordinate proper packaging, labeling, and disposal of asbestos waste in an approved land fill.
- Coordinate and evaluate the need for temporary relocation of building occupants during normal maintenance procedures.
- Evaluate the need to shut down local ventilation during maintenance procedures.
- Collect and compile project documentation to include:
 - Contractor certification.
 - Notifications/permits.
 - Air monitoring data.
 - Bulk monitoring data.
 - Waste manifests or disposal receipts.
 - Land fill permits.
 - Daily inspection log.
 - Final inspection report.
 - Assessment report.
 - Cost estimates.
 - Written verification or acknowledgement from the asbestos contractor and inspection/monitoring firms that the work was completed as specified and in compliance with applicable regulations. If not, what variances or

episodes occurred. Any knowledge of regulatory citations or litigation arising from or related to the project must be cited.

- A description of where and what type of asbestos abatement (removal, encapsulation, and/or enclosure) was completed and what materials were involved. Areas where total containment and/or glove bag removal techniques were employed is to be indicated.
- The identity of the contractor and inspection/monitoring firms involved in the project, and documentation of their qualifications.
- Written verification of project oversight by a certified industrial hygienist (CIH). This should include a copy of the CIH's certification certificate.

ASSESSMENT

An evaluation of potential asbestos-containing materials must be done before the type of hazard control required can be specified.

Attachment no. 1, Sampling Procedure for Collecting Bulk Field Samples to be Analyzed for Asbestos Content, can be adapted for use for the collection of bulk samples. All renovation or demolition projects, at a site, should be reviewed to determine if the materials might contain asbestos. Items to consider for assessments include the following:

- What is the location and extent of the asbestos-containing materials that are present?
 - Where are they present?
 - In what types of materials?
 - How much? (i.e., square feet, linear feet, etc.)
- What is the condition of the asbestos-containing materials that are present?
 - Friable or non-friable?
 - Accessible or inaccessible?
 - Damaged and/or deteriorated or in good condition?
- Are asbestos-containing materials located in return or supply air plenums or in high traffic areas?
- Has any air monitoring or assessment been completed to evaluate potential airborne concentrations?

- Is there an asbestos operations/maintenance program or other type of awareness or protection program in place to effectively manage the potential hazard?

Typical sources of asbestos include:

Design

- Acoustical finishes
- Ceiling tile
- Vinyl-asbestos floor tile
- Fire doors
- Transite siding
- Roofing materials

Structural

- Fireproofing
- Insulation

Plumbing

- Pipe insulation
- Insulation on pipe fittings

Heating, Ventilation, and Air Conditioning

- Pipe insulation
- Boiler insulation
- Breeching insulation
- Equipment insulation
- Duct insulation
- Fabric isolators

Attachment no. 2, Generic Scope of Work (SOW) provides important details that are required to perform an adequate assessment. The particular items on this SOW that need to be addressed in an assessment are bullets 1, 2, and 3 of I as well as all the remainder Roman numeraled items.

ENVIRONMENTAL CONSULTANT

This consultant can assist with both the assessment and hazard control required by the presence of architectural asbestos. The attached Generic Scope of Work illustrates what you might require from such a consultant. The SOW defined by Roman numeral no. I can be adjusted to meet the site's needs. In some cases, the site may elect to perform some of this work itself. In other cases, only an assessment is required. Other Roman numeral items are required. This is a generic form. Its use should be reviewed with Corporate Industrial Hygiene before it is distributed in a request for proposal (RFP).

Note that SOW which you provide to the environmental consultant in your RFP is your assurance that the work will be done the way you require. Separate [REDACTED] Terms and Conditions are available from Environmental Affairs for use with environmental consultants and the actual abaters (contractors) who will remove or repair architectural asbestos. The appropriate terms and conditions must be attached to your RFP with the SOW. This assures that insurance and legal requirements are met. While a consultant can be engaged to carry out the responsibilities of the facility asbestos abatement coordinator, the supervision of the consultant will remain the responsibility of the coordinator.

HAZARD CONTROL

Once the presence of asbestos has been established, a hazard control program must be established. If the material is not friable this may only require periodic inspection and maintenance of the asbestos-containing material. If the material is friable, or will become friable due to a renovation or removal procedure, then an adequate control program must be initiated. Local regulations may be quite stringent. These, as well as federal regulations and guidelines (EPA Guidance for Controlling Asbestos-containing Materials in Buildings, 1985 or more current materials), should be reviewed to determine an adequate control program. Corporate Industrial Hygiene and an environmental consultant can assist the site in the development of an adequate program. Note again the use of an adequate SOW, when engaging an environmental consultant.

HAZARD CONTROL AIR MONITORING

During projects which involve the use of containment and negative air machines (large abatements), area air monitoring must be performed during the abatement and after the abatement. Corporate Industrial Hygiene recommends the use of phase contrast microscopy (PCM) at the present time for all air monitoring, unless a governmental regulation requires some other method such as Transmission Electron Microscopy (TEM). If this type of evaluation is required by regulation then consultation should occur with Corporate Industrial Hygiene and with your environmental consultant to determine that the measurements taken meet regulatory requirements.

During large abatements, personnel samples on contracted abatement workers remain the responsibility of the contractor. The site coordinator or environmental consultant should be collecting area PCM air samples for engineering control in the following areas:

- Inside containment area
- Air lock
- Exhaust HEPA filter
- Outside containment area

After large abatements, aggressive clearance PCM air monitoring must be performed, to collect air samples that meet the following criteria:

<u>Location Sampled</u>	<u>Number of Samples</u>	<u>Sampling Method</u>	<u>Minimum Detection Limit (fibers/cc)</u>	<u>Minimum Volume (liters)</u>	<u>Maximum Flow Rate (LPM)</u>
Each Work Area	*	NIOSE 7400	0.005	3000	2.5
OR					
Each Room in Work Area (a minimum of five areas)	1	"	0.005	3000	2.5
At Job Site (Blank)	1	"	500 fibers/filter	0	
At Laboratory (Blank)	1	"	500 fibers/filter	0	

*At least five samples per the first 5000 square feet of work area plus one sample per each additional 5000 square feet of work area: or one sample per room, whichever is greater.

The purpose of these clearance air samples is to determine that the area is free of asbestos and thus to release the contractor from further cleaning of the remediated area. Release criteria should be 0.01 fibers > 5 μ/cm^3 by PCM or better. If TEM samples have been collected the appropriate EPA protocol must be followed. Contact Corporate Industrial Hygiene concerning specific guidance before attempting TEM clearance air monitoring.

If local regulations require that PCM clearance air samples be collected in a manner that does not coincide with the preceding chart, contact Corporate Industrial Hygiene for further guidance.

In abatements where glove bag removal is used area air monitoring for engineering control may also be required during and after the abatement. Consult local regulations and Corporate Industrial Hygiene to determine if less monitoring is required than during a large abatement.

The management of asbestos abatement projects is an evolving art. Each project within [REDACTED] is to be reviewed by

Environmental Affairs before its inception to assure that compliance with regulations occurs, that cost-effective projects are undertaken, and that our highly valued resources, the [REDACTED] employee, the public, and the environment are protected.

[REDACTED] CORPORATE INDUSTRIAL HYGIENE DEPARTMENT

**SAMPLING PROCEDURE FOR COLLECTING BULK FIELD
SAMPLES TO BE ANALYZED FOR ASBESTOS CONTENT**

SCOPE:

This procedure is to be used in determining where asbestos insulation or other structural materials containing asbestos are located within a building.

1. Preliminary Procedures

- 1.1 Only persons necessary to assist in the collection of samples should be present.
- 1.2 Persons collecting samples are to wear a respirator equipped with high efficiency filters. Consult your plant Industrial Hygiene and Safety Representative for further assistance in this area.
- 1.3 The material should be sampled when the area is not in use.
- 1.4 The sample container should be held away from the face during actual sampling.
- 1.5 The material should not be disturbed any more than necessary.
- 1.6 The material can be sprayed with a light mist of water to prevent fiber release during sampling.
- 1.7 If pieces of material break off during sampling, wet mop the floors and areas where they have fallen. Dispose of any such debris as asbestos contaminated waste. Good personal hygiene practice should be observed.

2. General Collection Procedure

- 2.1 Representative samples should be taken from within the material itself by penetrating the depth of the material. It is important to penetrate the material because it may have been applied in more than one layer or covered with paint or a protective coating. This kind of sample is called a bulk sample.
- 2.2 One sample should be taken for approximately every 5,000 square feet of material having the same color and texture (i.e., it is homogeneous in appearance). Material of a different appearance should be sampled separately.

CORPORATE INDUSTRIAL HYGIENE DEPARTMENT

**SAMPLING PROCEDURE FOR COLLECTING BULK FIELD
SAMPLES TO BE ANALYZED FOR ASBESTOS CONTENT**

- 2.3 Small areas or pieces of equipment with less than 5,000 square feet of material should also be sampled separately if different material is found.
- 2.4 Use a small container such as a plastic 35 mm film canister, sealable plastic bag or metal container. The container should be dry and clean.
- 2.5 The sample can be taken by using a knife to cut out or scrape off a small piece of material and then placing it gently into the container. The quantity of material to be analyzed should be about the size of the 35 mm film canister.
- 2.6 Be sure to penetrate any paint or protective coating and all the layers of the material.
- 2.7 Tightly close the sample container; wipe the exterior of the container with a damp cloth to remove any material which may have adhered to it during sampling.
- 2.8 Tape the container lid to prevent the accidental opening of the container during shipment or handling.
- 2.9 Label the sample container. This label should identify the plant and date the sample was taken, and bear a unique identification (ID) number.
- 2.10 Make a record of each sample by completing the attached Laboratory Request Form for asbestos bulk analysis.
- 2.11 Send the sample and request form to:

Clayton Environmental Consultants
22345 Roethel Drive
Novi, MI 48050
Telephone: (313) 344-1770
Robert Lieckfield, Manager of Laboratory Services

NOTE! - Bulk analysis costs are about \$30.00 per sample, less corporate discount.

- 2.12 Also send a copy of the request form to Corporate Industrial Hygiene,

Attachment No. 2

GENERIC SCOPE OF WORK

for [REDACTED] Facilities

- I. The scope of services to be provided includes but is not limited to the following:
 - Perform a survey of the site, adequate to identify the location, condition, and quantity of all asbestos-containing materials that are present.
 - Write an assessment report that details the findings of the survey.
 - Prepare cost estimate for remediation and/or removal.
 - Prepare any required permit applications and notifications, including variance requests.
 - Prepare an Abatement Project Manual (bid documents including technical specifications).
 - Assist in procuring contractor bids and contractor selection.
 - Provide Project Management/Contract Administration, and On-Site Monitoring and Inspection services during asbestos abatement activities.
 - Collect and develop project documentation.
- II. The analysis of all bulk material samples shall be performed by a laboratory rated as proficient by the U.S. Environmental Protection Agency Bulk Asbestos Sample Quality Assurance Program or other appropriate program. A one percent detection limit for the analysis of bulk samples by PLM is also required. The analysis of all air samples shall be performed by a laboratory accredited by the American Industrial Hygiene Association. The laboratory of first choice for the analysis of bulk or air samples shall be [REDACTED]
- III. A Certified Industrial Hygienist shall provide project oversight and quality assurance of all work performed.
- IV. All written reports to be presented first in DRAFT form for review purposes before final documents are issued.
- V. Four copies of all documents to be presented to a [REDACTED] representative.
- VI. All work is to be performed in compliance with all current, applicable local, state, and local regulations.



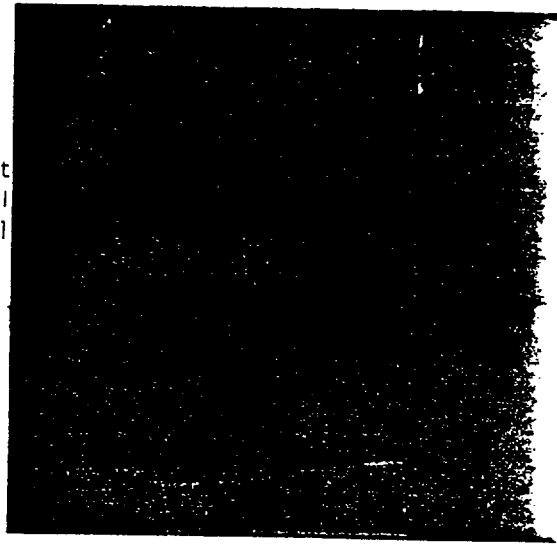
4-5-89

Laura Kupper

Thanks for
your information

Bill Holden

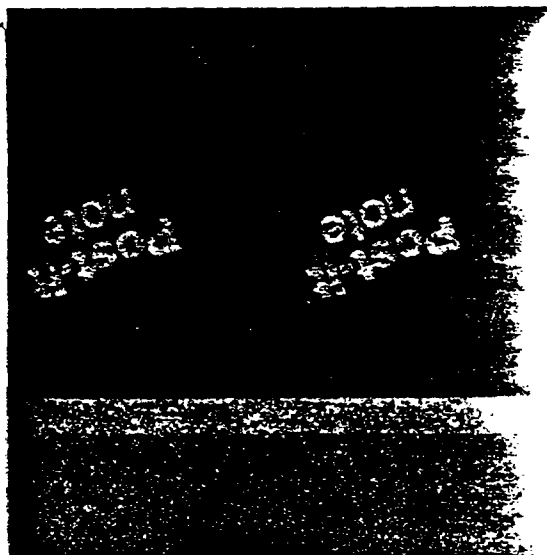
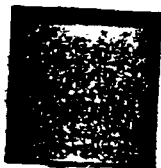
Kat
(W)
(4)



Laura-

Thanks for the
loan. I've been
in touch w/ Kate.

Russ Yester
4-24-89



Kate Goellner
(WIN) 272-3930
(412) 642-3930

