CYANAMID

PLAINTIFF'S EXHIBIT

ACC-22

To: A. C. Marek

Location: Wayne

From: N. D. Yin

Location: Wayne

Extension: 2708

Subject: ASBESTOS - AZUSA RESIN PLANT

Reference: -

Date: May 15, 1991

Copy to: J. C. Caporossi-W3
C. Lawrence-AZ
J. Marin-AZ
J. B. Reid-M2

Asbestos identification at Azusa Old Resin Plant can be categorized in the following ways:

1. DESIGNATED ASBESTOS - CONTAINING MATERIALS
Based on the previous test results and economic concerns, all pipeline insulations, trancite siding materials and insolation materials on Dow Therm and hot oil system are designated as containing asbestos materials. In such, it can be handled easily and cost effectively during the future abatement project.

   The exhaust ventilation duct on top of tanks BK3 and BK5 due to asbestos was once used as a raw material, should also be designated as the asbestos contaminated material.

   Insulations of reactors, storage tanks, PK1, PK2, PK3, PK4, CK1, CK2, BK1, BK2, BK3 and the condenser tank suspended on top of PK3, are recognized as containing asbestos.

2. SUSPECTED ASBESTOS - CONTAINING MATERIALS
17 storage tanks, spray on materials on the iron bean, debris on the ground are suspiciously containing asbestos and 26 samples were collected on 5/8/91 for identification. Samples are being analyzed for asbestos at Stamford Industrial Hygiene Lab and results will be available by 5/29/91.

3. TANKS DO NOT CONTAIN ASBESTOS MATERIALS
29 tanks and one silo does not have insulation material and therefore, should not be included in the future asbestos abatement project.

Once laboratory results are finalized, I will summarize the asbestos information on tank insulations for you by 5/31/91.

N. D. Yin

NDY:kt/ndy0515a

0190

NA 839-03 REV 7-85 6-89

Hygienetics, Inc.

19600 Fairchild, Suite 120
Irvine, CA 92715
(714) 955-0201
Telecopy: (714) 955-0965

FILE

February 28, 1991

Mr. Jesse Marin, Facility Manager
Criterion Catalyst Co.
1001 N. Todd Ave.
Azusa, CA 91702

Re: Design and Construction Services - Criterion Catalyst Facility

Dear Mr. Marin:

We are pleased to submit the attached proposal and associated fees to provide Design and Construction Phase Services for the forthcoming asbestos abatement project at your facility.

It is our understanding that previous inspections have identified the asbestos-containing materials at the facility. Therefore, we have not included confirmatory sampling activities within our proposal. It is also our understanding that interior tank linings/insulations are not included within the scope of work.

We are proposing fixed fees (excluding reimbursables) for Tasks I, II, III-A, and IV. For Task III-B (Compliance Monitoring of the Contractor) we are estimating a per shift fee of $630.00. This fee is based upon an 8-hour work shift by the Abatement Contractor and assumes that six (6) PCM area samples will be collected and analyzed by the on-site industrial hygienist. When we have completed the Design Phase, we will be able to establish a budget for our on-site services.

All aspects of this project will be completed by this office. We anticipate that Mr. Mercado will serve as our Project Manager and will report to you.

We have also enclosed a specimen copy of our Certificate of Insurance for your review.

We are very interested in receiving this contract. Therefore, should you wish to discuss any aspect of our proposal or fee structure, please contact me immediately.

We look forward to working with you and Criterion Catalyst.

Sincerely,

HYGIENETICS, INC.

J. Michael Jones

J. Michael Jones, A.I.A.
Sr. Vice President

JMJ1:LA91028/L0030

cc: Mr. Nick Yin

0191

PROPOSAL FOR

DESIGN AND CONSTRUCTION SERVICES ASSOCIATED WITH ABATEMENT OF ASBESTOS MATERIALS

Prepared For:

CRITERION CATALYST
1001 N. TODD AVENUE
AZUSA, CALIFORNIA 91702

Prepared By:

HYGIENETICS, INC.
19600 FAIRCHILD, SUITE 120
IRVINE, CALIFORNIA 92715

FEBRUARY 28, 1991

JMJ1:LA91028/L0030

SCOPE OF SERVICES

Task I - Design and preparation of Contract Documents, Drawings, and Specifications.

The preparation of these documents for the removal of asbestos-containing materials from Section 1 (Dowtherm), Section 2 (East Tank Farm), Section 3 (Passageway from Process Area), and Section 4 (Kettle Tanks in Process Area) will include the following tasks:

1. Site visit to document existing conditions and generate quantity estimates;

2. Preparation of Bidding Documents;

3. Preparation of General Conditions and Supplementary Conditions of the Contract;

4. Preparation of the Technical Specifications for the abatement work;

5. Preparation of Contract Drawings indicating ACM locations, work area isolation zones, staging areas, etc.; and

6. Consultant's estimate of abatement costs to execute the work.

FIXED FEE (excluding reimbursables): $3,200.00

DELIVERY TIME - 100% submission within two weeks of site visit.

Task II - Evaluation of Abatement Contractors, Pre-Bid Meeting, and Selection of Abatement Contractor.

Hygienetics will submit to Criterion Catalyst a list of at least three pre-qualified abatement contractors. Upon approval of the list by Criterion Catalyst, Hygienetics will only invite the pre-approved abatement contractors to bid for the project. A pre-bid meeting will be conducted by Hygienetics and be attended by Criterion Catalyst representatives, and representatives of the contractors.

Hygienetics will assist Criterion Catalyst in evaluating the bids and selecting the most responsive bidder.

FIXED FEE (excluding reimbursables): $1,160.00

Task III - Construction Monitoring

Hygienetics will provide trained personnel to observe the work of the asbestos abatement contractor to determine substantial compliance with the specification and Contract documents. Hygienetics shall also be responsible to collect and analyze air samples before (background), during, and after abatement activities. Air samples shall be analyzed by the Phase Contrast Microscopy (PCM) NIOSH 7400 Method.

Criterion Catalyst shall provide Hygienetics an appropriate space to be used by Hygienetics as an on-site laboratory for the duration of the project.

A. Pre-abatement submittals review and background air sampling.

FIXED FEE: - = $670.00

B. Cost per shift of monitoring during and after abatement activities (per 8 hour shift of abatement contractor)

Project Manager	1 hr @ $60/hr	= $ 60.00
Industrial Hygienist	9 hrs @ $50/hr	= $450.00
(est.) air samples	6 @ $20/ea	= $120.00
COST PER SHIFT (excluding reimbursables)		= $630.00

Task IV - Close-Out Documentation

Hygienetics will prepare and submit to Criterion Catalyst a close-out report in compliance with South Coast Air Quality Management District (Rule 1403) and in accordance with the Contract Documents. This document will contain, but is not limited to, the following:

1. Project Summary Report
2. Daily Project Summaries
3. Weekly Project Summaries
4. Specifications
5. Job Schedule
6. Notifications
7. Copies of Licenses
8. Waste Manifest
9. Final Inspection Forms
10. MSDS/MFG Data
11. Register of Approved Asbestos Workers
12. Contractor's Daily/Weekly Sign-in Sheets
13. Worker Training/Respirator Fit Test/Medical Documentation
14. Worker Acknowledgement Statements
15. Contractor's Personal Air Monitoring Results
16. Hygienetics' Air Monitoring Results
17. Daily Asbestos Removal Inspection Records
18. Contractor's Daily Work and Staffing
19. Asbestos Project Visitor's Register
20. Contractor's Insurance Certificate
21. Contractor's Formal Written OSHA Respirator Plan
22. Contractor's Emergency Evacuation Plan
23. Contractor's Standard Work Practices
24. Correspondence
25. Site Photographs

FIXED FEE (excluding reimbursables): $2,160.00

FEE SUMMARY

Task I - Design Phase	$3,200.00
Task II - Bidding Phase	$1,160.00
Task III - Construction Phase	
A. Pre-Abatement	$ 670.00
B. Abatement (per work shift)	$ 630.00
Task IV - Close-Out Documentation	$2,160.00

Reimbursable Expense Summary

Mileage @ $0.26/mile
Reproduction (photocopy/printing) @ cost
Courier/Express Mail @ cost

ACORD CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY): 10/13/90

PRODUCER

SEDGWICK JAMES
OF NEW ENGLAND, INC.
40 BROAD STREET
BOSTON, MA 02109
ATTN: JANET MERRILL

INSURED

HYGIENETICS, INC.
98 NORTH WASHINGTON STREET
BOSTON, MA 02114

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY LETTER A	LEXINGTON INSURANCE CO.
COMPANY LETTER B	NEW ENGLAND INSURANCE CO.
COMPANY LETTER C	UNITED COASTAL
COMPANY LETTER D	FIDELITY & CASUALTY CO OF NY
COMPANY LETTER E	ROYAL INSURANCE CO OF AMERICA

COVERAGES

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIABILITY LIMITS IN THOUSANDS	EACH OCCURRENCE	AGGREGATE
A	GENERAL LIABILITY	PC 553-2401	11/28/89	11/28/90			
	X COMPREHENSIVE FORM				BODILY INJURY	$	$
	X PREMISES/OPERATIONS				PROPERTY DAMAGE	$	$
	X UNDERGROUND EXPLOSION & COLLAPSE HAZARD				BI & PD COMBINED	$ 1000	$ 1000
	X PRODUCTS/COMPLETED OPERATIONS						
	X CONTRACTUAL						
	X INDEPENDENT CONTRACTORS						
	X BROAD FORM PROPERTY DAMAGE						
	X PERSONAL INJURY				PERSONAL INJURY		$ 1000
	X Broad Form CGL						
E	AUTOMOBILE LIABILITY	PMHX13044(4)	07/28/90	07/28/91			
	ANY AUTO				BODILY INJURY (PER PERSON)	$	
	ALL OWNED AUTOS (PRIV. PASS.)				BODILY INJURY (PER ACCIDENT)	$	
	ALL OWNED AUTOS (OTHER THAN PRIV. PASS.)				PROPERTY DAMAGE	$	
	X HIRED AUTOS				BI & PD COMBINED	$ 1000	
	X NON-OWNED AUTOS						
	GARAGE LIABILITY						
	X SCHEDULED VEHICLES						
B	EXCESS LIABILITY	MV0000398	11/28/89	11/28/90			
	X UMBRELLA FORM				BI & PD COMBINED	$5000	$ 5000
	OTHER THAN UMBRELLA FORM						
D	WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY	23C874644590I	09/12/90	09/12/91	STATUTORY		
					$000 (EACH ACCIDENT)		
					$000 (DISEASE-POLICY LIMIT)		
					$000 (DISEASE-EACH EMPLOYEE)		
C	OTHER Professional Liability	UCPC0137 Claims Made	11/28/89	11/28/90		1,000,000 OCC	3,000,000 AGG

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

THIS IS A SAMPLE CERTIFICATE

0198

CERTIFICATE HOLDER

10- 24

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE