ASBESTOS AND LEAD-BASED PAINT OPERATIONS & MAINTENANCE PLAN

BUILDING #506
FORMER FORT MCPHERSON ARMY BASE
ATLANTA, FULTON COUNTY, GEORGIA

OASIS PROJECT NO. 163766

Prepared For:

Mr. Arthur Mallard
MILRA
1794 Walker Avenue SW
Atlanta, Georgia 30310

Prepared By:

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October 10, 2017

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Mr. Arthur Mallard
Fort McPherson Implementation and Local Redevelopment Authority (MILRA)
1794 Walker Avenue SW
Atlanta, Georgia 30310

Subject: Asbestos and Lead-Based Paint Operations & Maintenance Plan
Building #506
Former Fort McPherson Army Base
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Dear Mr. Arthur Mallard:

Oasis Consulting Services (Oasis) is pleased to present this Asbestos and Lead-Based Paint Operations & Maintenance Plan (O&M Plan) completed for Building #506 (hereafter also referred to as Building) at the former Fort McPherson Army Base. The O&M Plan was prepared on behalf of the current property owner to provide disclosure and guidance to their tenants and contractors as to where suspected and confirmed asbestos-containing materials (ACMs) and lead-based paint (LBP) is located within the Building. Additionally, the O&M Plan will assist the current building owner and/or facility manager how to safely manage and maintain ACMs and LBP in good condition, and provides building owners with options to control or minimize potential fiber releases and lead dust episodes while the Building is being leased. This O&M Plan only covers the interior portions of Building 506 and does not include the exterior portions of the Building. Therefore, building materials and painted components on the exterior portions of Building 506 should be considered positive for asbestos and lead paint unless future testing indicates otherwise.

Suspected and confirmed ACMs and LBP surfaces require routine surveillance and maintenance to retain these materials in good condition while being left in-place. These efforts will minimize risk hazards to human health. If these materials become damaged and require renovation and/or major repair, a comprehensive asbestos and/or lead-based paint survey should be conducted. Any necessary repairs or abatement should be conducted by a licensed abatement contractor in Georgia.

Limited sampling and testing for suspect ACMs and LBP were completed as part of this O&M Plan. A total of 17 bulk samples of friable building materials suspect for the presence of asbestos were submitted to a laboratory for analysis. Friable ACMs are those materials that can be

crushed or pulverized by hand pressure. **Laboratory results revealed that five (5) of the samples analyzed contained >1% asbestos in Building 506 (Units A & B) and included the following: vinyl sheet flooring and associated mastic (Units A & B), floor tile and associated mastic (Unit B), and plaster wall coating (Unit B).**

The uppermost layer of exposed gray vinyl sheet flooring and associated gray mastic in Units A & B of Building 506 did not contain asbestos; however, older generations of vinyl sheet flooring (red-brown and yellow-brown in color) contained 25% Chrysotile asbestos in Unit A. Additionally, the gray mastic associated with the older generation vinyl sheet flooring contained 3% Chrysotile asbestos. Older generations of vinyl sheet flooring and floor tile (gray, white, and yellow in color) contained between 5% and 25% Chrysotile asbestos while associated black mastic contained 2% Chrysotile asbestos. All samples of vinyl sheet flooring and floor tile containing >1% asbestos were collected from the Kitchens of Units A & B. Plaster wall coating sampled on the first floor of Unit B contained 2% Chrysotile asbestos. Plaster walls were found to be exposed or encapsulated throughout the first floor of Unit B of Building 506. Suspect ACMs deemed as non-friable were also identified in Building 506, but were not tested as a part of this O&M Plan. These materials pose lesser risk than friable ACMs and include, but are not limited to, the following: cove base with adhesive, carpet mastic, and stair tread and associated adhesive. Known and encapsulated asbestos-containing thermal system insulation (TSI) was encountered in the basement of Building 506. This ACM is labeled where found within the basement of the Building.

A total of 113 painted surfaces were analyzed using an x-ray fluorescence (XRF) analyzer. **Eleven (11) of the painted surfaces contained lead concentrations in excess of 1.0 mg/cm^2; therefore, the paint is considered to contain elevated lead content.** Interior painted surfaces that were positive for LBP consist of the following components: doors and door jambs in both Units of Building 506 and in portions of the basement. No LBP was found in the interior portions of the 2nd floor Units of Building 506.

This O&M Plan summarizes the findings and our conclusions from the limited ACM and LBP surveys in more detail and should be read in its entirety. Oasis appreciates the opportunity to have worked with you on this project. Please feel free to contact us if you have any questions regarding this report or if we can be of additional service. Mr. Jarvis may be reached at (404) 840-1044, or by e-mail at sjarvis@oasis-cs.com.

Sincerely,
Oasis Consulting Services

Ashley Butterfield
Staff Geologist

Steven D. Jarvis, P.G.
Environmental Manager

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1.0 O&M PLAN OVERVIEW

The O&M plan was prepared on behalf of the current property owner to provide disclosure and guidance to their tenants and contractors as to where suspected and confirmed asbestos-containing materials (ACMs) and lead-based paint (LBP) is located within the Building. Additionally, the O&M Plan will assist the current building owner and/or facility manager how to safely manage and maintain ACMs and LBP in good condition, and provides building owners with options to control or minimize potential fiber releases and lead dust episodes while the building is being leased. This O&M Plan only covers the interior portions of Building 506 and does not include the exterior portions of the building. Therefore, building materials and painted components on the exterior portions of Building 506 should be considered positive for asbestos and lead paint unless future testing indicates otherwise. A site map for Building 506 is attached to this report in Appendix A as Figure 1.

The purpose of this O&M Plan is to provide tenant and contractor awareness, to perform routine surveillance, and to implement control measures so that ACMs and LBP surfaces within the Building are maintained in good condition or left undisturbed while remaining in-place during occupancy. The objective is to reduce or eliminate costs associated with asbestos abatement while mitigating the exposure of building occupants to airborne asbestos fibers and lead paint dust.

Suspected and confirmed ACMs and LBP surfaces require routine surveillance and maintenance to retain these materials in good condition. These efforts will minimize risk hazards to human health. If these materials become damaged and require renovation and/or major repair, a comprehensive asbestos and/or lead-based paint survey should be conducted. Any necessary repairs or abatement should be conducted by a licensed abatement contractor in Georgia.

Given that there is an OSHA provision in the construction asbestos standard [1926.1101(k)(2)(ii)(D)] that requires property owners to notify tenants of the location and quantity of ACMs in leased space, Oasis performed limited sampling and testing of suspect friable building materials believed to be in direct contact with building tenants. A discussion of the sampling and testing results is included in this O&M Plan.

The elements of this O&M Plan include the following:

1) Maintain ACMs and LBP in good condition;

2) Reduce future releases by minimizing ACM/lead paint disturbance or damage;

3) Respond to emergencies involving the disturbance of asbestos/lead paint; and

4) Monitor the condition of ACMs and LBP surfaces throughout the Building

The O&M Program will remain in effect until such time as all ACMs and LBP are removed from the Building. This O&M Plan is intended to serve as a "living document" and should be updated when conditions within the Building change, which includes any ACM and LBP removal.

The long term success of the O&M Plan stands with a designated or appointed individual who is willing to take charge of the Program. This person may be referred to as the O&M Plan Coordinator and could be the current property owner, a building facility manager, or a maintenance manager. An experienced environmental consultant may also periodically evaluate conditions and update the O&M Plan accordingly. The responsibilities of this critical role include the implementation of the O&M Plan, providing awareness to tenants and contractors working within the Building, assessing situations concerning asbestos and lead paint, determining whether or not outside assistance is needed to mitigate a potential hazard, performing periodic surveillance to ensure ACMs and LBP surfaces remain in good condition, and continuously updating the O&M Plan as needed.

2.0 ASBESTOS

2.1 Asbestos Methodology

Asbestos is a collective term given to a group of six commercial fibrous silicate minerals: Chrysotile (a serpentine mineral), Crocidolite, Amosite, Anthophyllite, Tremolite, and Actinolite (amphiboles). In addition to their inherent noncombustible property, asbestos products make excellent thermal insulators, are effective at condensate control, and are resistant to corrosive chemicals. To date, over 3,600 asbestos-containing commercial and consumer products have been identified. Some of the high-tonnage asbestos production is in flooring products, asbestos cement pipes, roofing products, friction products, asbestos cement sheets, packing and gaskets, insulation, paper products, textiles, etc.

Limited Asbestos Survey

The on-site Building was visually inspected for the presence of building materials that are suspected to contain asbestos. Bulk samples were collected of only those suspect materials that are considered friable and believed to be most likely disturbed by tenants and contractors at the Building. Friable building materials suspect for containing asbestos were collected and placed into individual containers for transport to CEI Laboratory in Cary, North Carolina for analysis. CEI is accredited by the National Institute of Standards and Technology (NIST) National Voluntary Accreditation Program (NVLAP) for laboratories analyzing bulk materials by polarized light microscopy. Materials visibly identified as non-asbestos (fibrous glass, metal, foam, rubber, wood, etc.) were not sampled. Non-friable building materials suspect for containing asbestos (i.e. carpet mastic, cove base adhesives/glues, stair tread adhesive, etc.) were not sampled as part of this O&M plan, but should be tested if planned for renovation or future disturbance. The asbestos inspection consisted of three basic procedures: 1) conducting a visual inspection of the interior portions of the structure and its related building materials; 2) identifying homogeneous areas of suspect surfacing, thermal system insulation, and miscellaneous materials; and, 3) sampling accessible, friable suspect materials while determining their condition.

Homogenous Areas

Prior to collecting friable suspect ACM samples, homogeneous areas (HAs) were identified to develop a limited sampling strategy. A homogeneous sampling area can be described as one or more areas of a building material that are similar in appearance and texture and that have the same installation date and function. Homogenous areas were established during the course of this survey. The actual number of samples collected from each homogeneous sampling area varied, based on the type of material and the professional judgment of the inspector. Each building material sampled was further classified into one of three categories, of which each category has specific sampling requirements.

Surfacing Materials: Refers to spray-applied or troweled surfaces such as plaster ceilings and walls, fireproofing, textured paints, textured plasters and spray-applied acoustical surfaces.

Thermal System Insulation: Refers to insulation used to inhibit heat gain or loss on pipes, boilers, tanks, ducts, and various other building components.

Miscellaneous Materials: Refers to friable and non-friable products and materials that do not fit in any of the above two categories such as resilient floor covering, baseboards, mastics, adhesives, roofing material, caulking, glazing and siding. This category also contains wallboard, joint compound and ceiling tile.

ACMs are divided into one of two categories as determined by the asbestos inspector, based upon their physical characteristics:

- "Friable" materials are those that, when dry, can be crumbled, pulverized, or reduced to a powder solely by hand pressure. The presence of friable ACMs indicates a potential for exposure to airborne asbestos fibers, should these materials be disturbed.

- "Non-friable" materials resist hand pressure. While considered less hazardous than friable materials, non-friable materials also have the potential to release airborne asbestos fibers if disturbed, improperly handled, or disposed. Building materials can potentially become friable if sawed, sanded, scraped and/or ground. Therefore, standard demolition practices could potentially cause building materials to become friable.

All confirmed friable ACMs are then assessed by their condition as good, damaged, or significantly damaged. Materials with localized significant damage was also assessed when observed. A physical assessment includes evaluating the condition and assessing the potential for disturbance of each friable material. Based on our observations at the time of the survey, suspect building materials sampled ranged from good to fair condition and have a low to moderate potential for future damage.

Sampling Strategy

The asbestos inspection was conducted according to modified Asbestos Hazard Emergency Response Act (AHERA) guidelines using a minimum number of samples collected from each HA, which also meets the sampling requirements found in 29 CFR 1926.1101. The inspection was performed by Ms. Ashley Butterfield and Mr. Mike Lucas with Oasis on August 29, 2017. Copies of their EPA-Accredited Asbestos Inspector training certificates are attached to this O&M Plan in Appendix D. The Building interior Sample Location Plan for ACMs is attached to this O&M Plan in Appendix A as Figure 2. Photographs taken as part of the limited asbestos survey are included in Appendix B.

Sample collection depends on the category that the HA corresponds to and the amount of material present, as follows:

GUIDELINES FOR DETERMINING THE NUMBER OF SAMPLES TO TAKE		
HA CATEGORY	**HA SIZE**	**SAMPLES REQUIRED**
Surfacing Materials	<1,000 SF	3
	1,000-5,000 SF	5
	>5,000 SF	7 or more
Thermal System Insulation	No Stipulation	3+ (Must also sample all repair patches – 1 per 6 SF/LF)
Miscellaneous Materials	No Stipulation	Per AHERA, these materials must be sampled "in a manner sufficient to determine whether or not they contain asbestos" typically 2-7 samples based upon inspector judgment.

If the analytical results indicated that none of the samples collected per homogeneous area contain asbestos, then the homogeneous area (material) would be considered non-ACM. However, if the analytical results of one or more of the samples collected per homogeneous area indicate that asbestos is present in quantities of greater than 1% asbestos, all of the homogeneous area (building material) would be treated as ACM regardless of any other analytical results. Materials that can be visually determined as non-asbestos (i.e., fibrous glass, metal, foam, rubber, etc.) by the accredited inspector are not required to be sampled.

Miscellaneous materials require adequate representative sampling, which is typically done by collecting at least one to three samples per suspect material. Inspectors typically rely on other survey observations such as the condition, friability, and quantity of material to determine what would be a sufficient number of samples to accurately evaluate the presence or absence of asbestos content.

Actual collection of a bulk asbestos sample involves physically removing a small piece of material and placing it in a marked, airtight container. Sample containers are marked with a unique identification number, which is also documented in the field notes. The suspect materials were sampled in general conformance with the methodology described in 40 CFR Part 763. Additionally, bulk sample collection and the selection of bulk sample locations were performed in general conformance with prevalent industry practice and procedures contained within the EPA document, Guidance for Controlling Asbestos-Containing Materials in Buildings, United States Environmental Protection Agency (EPA), 1985.

2.2 Asbestos Laboratory Analysis

Analysis of the suspect friable bulk samples for asbestos content, was performed by Polarized Light Microscopy (PLM) in accordance with EPA Interim Method of Asbestos in Bulk

Insulation Samples as defined in 40 CFR 763, Appendix B to Subpart F (600/R93-116). PLM analysis requires the microscopist to take a portion of the bulk sample and treat it with light refractive oils. The prepared slide is then subjected to a variety of tests while being viewed under the microscope. A visual estimation for asbestos content is then determined not only from the prepared slides, but also from an overall evaluation of the bulk sample collected, which is viewed under a stereoscope. Samples yielding from trace (<1%) to ten percent (10%) asbestos as determined by PLM may be further analyzed using the PLM point counting methodology. This is a technique for confirming the presence or absence of asbestos when lower percentages are visually estimated as outlined in the NESHAP regulations.

2.3 Asbestos Findings

A total of 17 bulk samples were collected as part of this O&M Plan and 66 sample layers were analyzed by PLM methodology. The collected number of samples was based on a determination of six (6) homogeneous areas identified for Building 506. Building materials sampled as part of this survey included friable suspect ACMs and those suspect non-friable materials that can become friable such as gypsum wallboard and associated joint compound, plaster wall, vinyl sheet flooring, and floor tile. Suspect non-friable ACMs that are not likely to become friable with normal everyday activity were also identified, but not sampled as part of the O&M Plan. These materials include cove base with adhesive/glue, carpet mastic, stair tread and associated adhesive.

The table below presents a summary of the samples collected as part of this O&M Plan. ACMs with multiple layers, such as vinyl sheet flooring, have layers listed in order from newest to oldest. The laboratory analytical reports are attached to this O&M Plan in Appendix C.

Sample Number	Sample Description	Asbestos Content	Friable	HA Category	Condition
Building 506					
506A-1	Gypsum Wallboard J/C-Tape over Plaster Wall	ND	Yes	Miscellaneous Material	Good
506A-2	Gypsum Wallboard J/C-Tape over Plaster Wall	ND	Yes	Miscellaneous Material	Good
506A-3	Plaster Wall	ND	No	Miscellaneous Material	Good
506A-4	Plaster Wall	ND	No	Miscellaneous Material	Good
506A-5	12”x12” Floor Tile (Brown)	ND	No	Miscellaneous Material	Good
506A-6	12”x12” Floor Tile (Brown)	ND	No	Miscellaneous Material	Good

506A-7	**Vinyl Sheet Flooring (Gray)**	Layer 1 VSF: ND Mastic: ND Layer 2 VSF: ND **Layer 3 VSF: 25% CH** **Mastic: 3% CH** **Layer 4 VSF: 25% CH**	**No**	**Miscellaneous Material**	**Good**
506A-8	**Vinyl Sheet Flooring (Gray)**	Layer 1 VSF: ND Mastic: ND Layer 2 VSF: ND **Layer 3 VSF: 25% CH** **Layer 4 VSF: 25% CH**	**No**	**Miscellaneous Material**	**Good**
506B-1	Gypsum Wallboard J/C-Tape over Plaster Wall	ND	Yes	Miscellaneous Material	Good
506B-2	Gypsum Wallboard J/C-Tape over Plaster Wall	ND	Yes	Miscellaneous Material	Good
506B-3	**Plaster Wall**	**Coating: 2% CH** Skim Coat: ND Base Coat: ND	**No**	**Miscellaneous Material**	**Good**
506B-4	Plaster Wall	ND	No	Miscellaneous Material	Good
506B-5	12”x12” Floor Tile (Brown)	ND	No	Miscellaneous Material	Good
506B-6	12”x12” Floor Tile (Brown)	ND	No	Miscellaneous Material	Good
506B-7	**Vinyl Sheet Flooring (Gray)**	Layer 1 VSF: ND Mastic: ND **Layer 2 VSF: 25% CH** Mastic: ND **Layer 3 Floor Tile: 5% CH** **Mastic: 2% CH**	**No**	**Miscellaneous Material**	**Good**
506B-8	**Vinyl Sheet Flooring (Gray)**	Layer 1 VSF: ND Mastic: ND **Layer 2 VSF: 25% CH** **Layer 3 Floor Tile: 5% CH**	No	Miscellaneous Material	Good
506B-9	Sink Undercoating	ND	Yes	Miscellaneous Material	Good

ND = No Asbestos Detected
J/C-Tape = Joint compound and paper backing
CH = Chrysotile Asbestos
VSF = Vinyl sheet flooring

Please be advised that some of the building materials listed in the table above can become friable by sawing, sanding, scraping and grinding.

2.4 Asbestos Conditions

The general condition of the ACM is categorized into the following several categories:

- Areas where confirmed or suspect friable ACM is deemed as "significantly damaged" is considered an immediate hazard and should be addressed prior to building occupancy. Mitigation may involve extensive encapsulation or abatement of the ACM by a licensed Asbestos Abatement Contractor.

- Areas where confirmed or suspect friable ACM is deemed as "damaged" is considered a high hazard and may be encapsulated with another material or abated by a licensed Asbestos Abatement Contractor.

- Areas where confirmed or suspect non-friable ACM that is in fair to good condition, but has a moderate potential for disturbance or damage which could make the material friable is considered a moderate hazard. Mitigation may or may not be required.

- Areas where confirmed or suspect non-friable ACM that is deemed in good condition with low potential for disturbance is considered a low hazard.

2.5 Asbestos Summary

Friable suspect ACMs, and those that may become friable, which were sampled in Building 506 and contain >1% asbestos include the following: **vinyl sheet flooring and associated mastic (Units A & B), floor tile and associated mastic (Unit B), and plaster wall coating (Unit B)**. Suspect ACMs deemed as non-friable were also identified in Building 506, but were not tested as a part of this O&M Plan. These materials pose lesser risk than friable ACMs and include, but are not limited to, the following: cove base with adhesive, carpet mastic, stair tread and associated adhesive. These materials should be regarded as positive for asbestos unless test results indicate otherwise.

- Four generations of vinyl sheet flooring and mastic were sampled from the Kitchen of Building 506 Unit A. The uppermost layer of exposed vinyl sheet flooring (gray in color) and associated gray mastic did not contain asbestos; however, the second (red-brown in color) and first (yellow-brown in color) generations of vinyl sheet flooring contained 25% Chrysotile asbestos. Additionally, the gray mastic beneath the second generation vinyl sheet flooring contained 3% Chrysotile asbestos. The uppermost generation of vinyl sheet flooring present in the Kitchen was observed as being in good condition.

- Five generations of vinyl sheet flooring and floor tile and their associated mastics were sampled from the Kitchen of Building 506 Unit B. The uppermost layer of exposed vinyl sheet flooring (gray in color) and associated gray mastic did not contain asbestos; however, the second (yellow-white in color) and third (gray in color) generations of vinyl sheet flooring and floor tile contained 5% and 25% Chrysotile asbestos, respectively.

Additionally, the black mastic beneath the second generation floor tile contained 2% Chrysotile asbestos. The uppermost generation of vinyl sheet flooring present in the Kitchen was observed as being in good condition.

- Four samples of plaster wall were collected throughout Building 506 (Units A & B). Of the four samples collected, one (1) sample contained >1% Chrysotile asbestos (Sample ID number 506B-3). Sample ID number 506B-3 was identified by the laboratory as having three separate layers that were analyzed. The first layer analyzed is labeled as the "plaster coat" which was not observed on the other three plaster wall samples collected that did not contain asbestos. The plaster coat layer of the sample contained >1% Chrysotile asbestos. Plaster walls throughout the first floor of Unit B were exposed or encapsulated with non-asbestos containing gypsum wallboard and associated joint compound.

3.0 LEAD-BASED PAINT

3.1 Lead-Based Paint Methodology

Prior to 1978, many paint manufacturers added lead to paint and coatings to increase the durability and lifespan of their products. However, over time it has been determined that these materials degrade, and the lead can leach out of those products and contaminate soil and groundwater. Rules have been promulgated to ensure the proper disposal/handling of lead-based paint.

Sampling Strategy

The lead-based paint inspection was conducted utilizing an X-ray Fluorescence Analyzer field screening device (XRF). The XRF was used on flat surfaces throughout the Building to identify lead content. The XRF provides an instant readout of lead concentration in paint in terms of milligrams of lead per square centimeter (mg/cm^2). Prior to the XRF inspection, Oasis field personnel were instructed on the correct use of the instrument and completed a radiation safety program. In the state of Georgia, readings greater than 1.0 mg/cm^2 indicate the presence of lead. The inspection was performed by Ms. Ashley Butterfield and Mr. Mike Lucas with Oasis on August 29, 2017. The LBP interior sample location plan is attached to this O&M Plan in Appendix A as Figure 3. Photographs taken as part of this lead-based paint inspection are also attached to this O&M Plan in Appendix B.

3.2 Lead-Based Paint Findings

Data was collected from 113 sampling points utilizing an XRF technology throughout Building 506 as part of this O&M Plan. Of the 113 samples analyzed, eleven (11) tested positive for LBP. The table below presents a summary of those painted surfaces that tested positive for LBP.

Sample Number	Color	Substrate	Building Material	Concentration (mg/cm^2)	Condition
Building 506					
506A-3	White	Wood	Door Jamb	>5.00	Paint Peeling/Flaking
506A-10	White	Wood	Door Jamb	>5.00	Paint Peeling/Flaking
506A-25	White	Wood	Door	>2.74	Paint Peeling/Flaking
506A-27	White	Wood	Door Jamb	>5.00	Paint Peeling/Flaking
506B-1	White	Wood	Door	>4.60	Significant Paint Peeling/Flaking
506B-3	White	Wood	Door Jamb	>5.00	Paint Peeling/Flaking
506B-14	White	Wood	Door Jamb	>5.00	Paint Peeling/Flaking
506B-28	White	Wood	Door	>4.60	Significant Paint Peeling/Flaking
506B-30	White	Wood	Door Jamb	>5.00	Paint Peeling/Flaking
506B-54	White	Wood	Door	>1.96	Paint Peeling/Flaking
506B-56	White	Wood	Door Jamb	>5.00	Paint Peeling/Flaking

3.3 Lead-Based Paint Summary

Of the 113 painted surfaces analyzed, eleven (11) of these contained lead concentrations in excess of 1.0 mg/cm^2 and are considered positive for LBP. In Building 506 (Units A & B), interior painted surfaces that were positive for LBP consist of the following components: doors and door jambs. Colors of these LBP components include white:

- White paint identified on wooden door jambs tested positive for LBP in the kitchens of Units A & B in Building 506.

- White paint identified on a wooden door tested positive for LBP in the kitchen of Unit B in Building 506.

- White paint identified on wooden door jambs tested positive for LBP in the dining rooms of Units A & B in Building 506.

- White paint identified on wooden doors and door jambs tested positive for LBP in the front entries of Units A & B in Building 506.

- White paint identified on a wood door and door jamb tested positive for LBP in the basement of Unit B of Building 506.

Existing components that contain lead-based paint and have significant paint peeling and/or flaking should be addressed prior to building occupancy. These painted surfaces may be covered or encapsulated, or repainted/sealed with a thick non-lead encapsulation paint product. If elected, these materials could be removed/replaced (abated) by a licensed abatement contractor.

4.0 BASICS OF THE OPERATIONS & MAINTENANCE PLAN

This O&M Plan has been developed to address the in-place management of ACMs and LBP. The primary purpose of the O&M Program is to mitigate the exposure of building occupants, maintenance workers, and outside contractors to asbestos fibers lead paint dust. The procedures contained in this Plan have been developed to address common O&M activities as well as less frequent activities that are likely to disturb asbestos containing materials and lead paint within the Building.

This Program is designed to mitigate potential exposures to asbestos fibers and lead from planned procedures and to minimize the opportunity for unplanned releases of asbestos fibers and lead dust. The program addresses operations and tasks from experience as well as anticipated procedures. However, every situation that may involve a release to asbestos and lead cannot be anticipated. If there is a question about the possibility of encountering asbestos containing materials or lead containing paint during any task or operation in the Building, assume that asbestos and lead is present. Building management and/or an O&M Plan Coordinator can provide guidance and proper procedures for completing the task safely.

With respect to asbestos, recommendations and procedures contained herein are based upon existing regulatory guidelines, including the United States Environmental Protection Agency's (US EPA) document "Managing Asbestos in Place - A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials". When asbestos-containing materials are present in a building, proper management of the materials is necessary to prevent the occurrence of hazardous conditions to building occupants.

With respect to lead paint, reference to the following document will also provide guidance to the Building owner, tenants, contractors and an O&M Plan Coordinator: Summary of the Georgia Environmental Protection Division’s Lead-Based Paint Renovation, Repair and Painting Rules (RRP) For Contractors, Property Managers and Maintenance Personnel, revised September 2016.

4.1 O&M Plan Coordinator

As discussed in Section 1, the long term success of the O&M Plan is dependent upon a designated or appointed individual who is willing to take charge of the Program. This dedicated individual may be referred to as an O&M Plan Coordinator, the one who has the responsibility for coordinating all activities involving potential ACM and LBP disturbance, ACM and LBP abatement or other mitigation techniques, and who will maintain the O&M Plan and keep it current. This person may be the current property owner, a building manager, or a maintenance manager.

An experienced environmental consultant may also periodically evaluate conditions and update the O&M Plan accordingly. The responsibilities of this critical role include the implementation of the O&M Plan, providing awareness to tenants and contractors working within the Building,

assessing situations concerning asbestos and lead paint, determining whether or not outside assistance is needed to mitigate a potential hazard, perform periodic surveillance to ensure ACMs and LBP surfaces remain in good condition, and to continuously update the O&M Plan as needed.

Additionally, the O&M Plan Coordinator should be the primary contact for employees and occupants who may have questions regarding ACMs, LBP surfaces, and/or the O&M Plan itself. Activities which will potentially involve the disturbance of identified ACM or LBP surfaces, should be discussed with the O&M Plan Coordinator. Activities involving disturbance or potential disturbance of ACM or lead paint shall be documented by the O&M Plan Coordinator when they occur.

When the O&M Plan Coordinator for Building 506 has been assigned, the following information should be inserted below for building occupant/tenant and contractor knowledge:

NAME: _____
COMPANY: _____
ADDRESS: _____
_____
TELEPHONE: _____

The O&M Plan Coordinator should be aware of the following:

- He/she should have knowledge of the Building and the locations of ACMs and LBP surfaces within the Building. Sampling and analysis specific to a planned renovation area may be necessary to identify and confirm ACMs or LBP surfaces prior to planning renovation work or other disturbance, if these areas have not been tested.
- He/she should be competent in maintaining necessary records contained within this O&M Plan.
- He/she should have a complete understanding of this O&M Plan.

4.2 Worker Protection

4.2.1 Supervisory Staff

Any supervisor or manager that occupies Building 506 should review this O&M Plan. These individuals shall notify the O&M Plan Coordinator if any of their employees in performance of their duties, discover ACM or LBP or believe that ACM or LBP surfaces have been disturbed or damaged.

4.2.2 Custodial Staff Members

Custodial Staff should review this O&M Plan and be made aware of the locations of ACM and LBP surfaces throughout the Building. They should be instructed to notify the O&M Plan Coordinator if, in the performance of their duties, they discover ACM or LBP surfaces or believe that ACM or LBP surfaces have been disturbed or damaged.

4.2.3 Contractors

Independent contractors other than licensed Lead Paint and/or Asbestos Abatement Contractor(s), whether retained by the tenant, building owner or another contractor, may be engaged to perform construction, alteration, renovation, demolition, or other work at the Building; however, the purpose of their visit should be discussed with the O&M Plan Coordinator. Contractors can potentially come into contact with and disturb ACM or LBP surfaces should these services be requested by someone other than the O&M Plan Coordinator. As such, all Contractors should report to the O&M Plan Coordinator prior to beginning any work at the Building.

No Contractor shall perform any work in any portion of the Building until the scope of work to be performed has first been discussed with the O&M Plan Coordinator. The contractor must also obtain authorization to proceed from the O&M Plan Coordinator. No contractor shall perform any work in any portion of the Building containing ACM or LBP surfaces unless the O&M Plan Coordinator has determined that the contractor's work, if properly performed, would not disturb known or suspect ACM or LBP surfaces.

Contractors shall not disturb or damage known ACM or LBP surfaces unless trained and licensed to perform repairs involving ACM or LBP. Contractors shall report to the O&M Plan Coordinator if there will be any disturbances to ACMs, LBP surfaces, or any material believed to be ACM or a LBP surface. It should also be reported if there is any discovery of an ACM or LBP surface, or a material believed to be ACM or a LBP surface in a location, circumstance, or condition other than as identified in this O&M Plan.

4.2.4 Lead Paint and Asbestos Abatement Contractors

The Lead Paint and/or Asbestos Abatement Contractor(s) is an independent contractor performing any work at the Building that involves abatement, encapsulation, disturbance, containment, spot removal, minimization, cleaning, and/or disposal of ACM or LBP, or that otherwise requires such contractor to be licensed by the applicable state to perform the work in any area of the Building containing ACM or LBP. Lead Paint or Asbestos Abatement Contractors shall be duly licensed in Georgia and shall furnish a copy of such license to the Building owner to be kept on file prior to performing any work. The Building owner shall be notified in writing by the O&M Plan Coordinator at least 5 business days prior to the commencement of any work to be furnished by a Lead Paint or Asbestos Abatement Contractor.

The Lead Paint or Asbestos Abatement Contractor shall perform their work in accordance with any required specifications issued by the O&M Plan Coordinator and this O&M Plan, and in accordance with applicable local, state, and federal laws, rules, and regulations.

4.3 Communication

This section describes the steps to properly notify building occupants, contractors, and employees of the presence of asbestos and lead paint in the Building, the existence of the O&M Plan and an understanding of abatement activities. It also addresses warning labels and caution signs where appropriate.

Good communication between the Building management, all tenants, contractors, and employees ensures:

- Regulatory requirements are met
- Work will be performed in accordance with the O&M Plan
- Persons lacking appropriate training are prevented from disturbing asbestos/lead paint
- Misunderstandings will be prevented

4.3.1 Communication with Tenants

Communication between the Building management and the tenants should be documented to file. Upon implementation of this O&M Plan, the O&M Plan Coordinator will inform tenants that the O&M Plan is available for their review. An example letter is included in Appendix E. Particular attention should be directed to:

- The locations of confirmed and suspected ACM and LBP within the tenant's space;
- The communication/notification system as described in this section; and
- Prohibited practices.

Building occupants are specifically prohibited from certain activities that have the potential to disturb ACM and LBP. In particular, the following activities are prohibited:

- Performing work above dropped ceilings on unabated floors;
- Entering or penetrating utility shafts;
- Entering or penetrating interior and perimeter column enclosures;
- Disturbing floor tiles or floor tile mastics;
- Disturbing walls and ceilings;

- Disturbing any building materials suspected of containing asbestos and lead paint.

The O&M Plan Coordinator will respond to Building occupants questions concerning their role in the O&M Program. When an O&M activity will be performed in a tenant's space, the O&M Plan Coordinator will notify the Manager/Supervisor on behalf of the tenant's company or business that is leasing and/or occupying the space, and will arrange to perform the work so as to cause minimal interruption of normal operations.

4.3.2 Outside Contractor Communication

All contractors (non-abatement) working in the Building should be notified of the presence and locations of ACM and lead paint. They will also be notified that any work which will disturb these materials, including work above dropped ceilings on unabated floors, must be performed in accordance with the specific requirements of the O&M Plan.

If an individual contractor encounters any suspect ACM or lead paint, or if any planned work would disturb ACM (such as work above dropped ceilings on unabated floors or work in shafts) or LBP, the contractor must contact the O&M Plan Coordinator prior to the start of the work. The O&M Plan Coordinator will arrange for the work to be performed by a licensed abatement contractor.

4.3.3 Employee Communication

The O&M Plan Coordinator should initially notify all Building management employees of the presence of asbestos and lead paint in the Building through a written notification letter (see example in Appendix E). The tenant supervisor or manager should be responsible for any communications with their employees regarding asbestos and lead paint, as may be required by law.

4.3.4 Notification to Agencies

When ACMs and lead paint are disturbed, intentionally or unintentionally, the Georgia Environmental Protection Division – Asbestos and Lead Paint Program (GAEPD) may need to be contacted in an emergency situation at (404) 362-2647; however, this is dependent upon the amount of material disturbed. General disturbance to asbestos and lead containing materials within the Building can be directed to a licensed abatement contractor or an environmental consultant for assistance who can also make any required state notifications. A licensed abatement contractor will also make the necessary notifications for any minor or major disturbances to which they respond at the Building for renovation or demolition purposes. It is important for the O&M Plan Coordinator and others to know, however, under what conditions notifications are required, and the amount of time required for notifications, so that appropriate planning can occur. In addition, there may be occasions, during some emergencies, when the O&M Plan Coordinator will make notifications directly.

4.4 Notification Requirements

Projects which are performed near ACM and lead paint, but which will not physically disturb these materials, do not require notifications to any state agencies or licensed abatement contractors. Disturbance is caused when any process, which through direct contact, vibration, air movement, or other means, physically moves ACM and lead paint in such a way that fibers and dust can become airborne. If there is any doubt as to whether or not these materials could be disturbed during any activity, the O&M Plan Coordinator should be consulted.

Planned Operations Involving ACM

The GAEPD must be notified of any planned removal asbestos and LBP operations. Any planned removal/disturbance of asbestos requires a 10-day notification to the GAEPD with the following form completed and submitted to the GAEPD: Georgia Project Notification Form for Asbestos Renovation, Encapsulation or Demotion (Revised June 2012). The notification process can be performed by a licensed abatement contractor, an environmental consultant, building owner or the O&M Plan Coordinator.

Planned Operations Involving LBP

Although the lead-based paint program in Georgia is geared to target housing and child-occupied facilities, it is recommended that activities which require the use of a contractor, that the contractor be licensed in Georgia as a Certified Georgia Renovator who understands Georgia's Lead-Based Paint Renovation, Repair and Painting Activities rules and regulations that were implemented in December 2010.

Emergencies Involving ACM and LBP

An emergency is any situation which may damage or cause harm to property or human health.

For emergencies involving any amount of ACM/lead paint, the GAEPD may be contacted; however, the clean-up and abatement of the emergency must be completed by a licensed abatement contractor.

For emergencies involving greater than 3 square feet or 3 linear feet of ACM, a licensed abatement contractor should be contacted to evaluate the situation. An environmental consultant certified as an asbestos inspector can be contacted for situations or emergencies involving less than 3 square feet or 3 linear feet of ACM.

For emergencies involving LBP, Georgia's RRP Program applies when disturbing more than 6 ft^2 of lead painted or coated surfaces per interior room, when disturbing more than 20 ft^2 of lead painted or coated surfaces on exterior building components, when replacing windows of any size, and partial demolitions of structures, walls or components that are not entire demolitions where lead paint is suspected or present.

4.5 Renovation or Demolition Practices

In the event that suspect ACM and/or LBP surfaces are to be disturbed by future renovation work, a thorough survey and proper lead paint and asbestos abatement procedures should be implemented prior to the commencement of such work. This O&M Plan includes asbestos and lead-based paint inspections of readily visible materials only.

Additional ACM and LBP may be located within walls, ceiling cavities, and/or in other non-accessible areas of the Building. Precaution should be used in relation to any subsequently observed suspect ACM and LBP that may be present within walls, ceiling cavities, and/or other non-accessible areas of the Building until the appropriate sampling and analysis has established the sampled material's asbestos and lead content.

The following work practices shall not be used for any work that disturbs ACM and LBP, regardless of the measured levels of asbestos and lead exposure, or the results of any initial exposure assessments:

- Dry sanding
- High-speed abrasive disc saws that are not equipped with point of cut ventilator or enclosures with HEPA filtered exhaust air
- Compressed air used to remove or clean dust and debris from materials containing asbestos or lead
- Dry sweeping, shoveling or other dry clean-up of dust and debris containing confirmed or suspected ACM and LBP
- Employee rotation as a means of reducing employee exposure to asbestos and lead
- Removal of any confirmed or suspected ACM or lead-painted component shall not be performed by anyone other than a licensed abatement contractor

4.6 Warning Signs and Labels

Warning signs and labels are an effective means of preventing unauthorized, untrained individuals from disturbing ACMs and LBP. Two types of warning signs may be used:

- Signs or stickers posted on materials that have been confirmed to contain asbestos and lead paint; and
- Labels posted on ACMs or Lead-Painted components in potentially contaminated areas.

Building management or the O&M Plan Coordinator may post warning signs in the event of an emergency, otherwise the licensed abatement contractor will be responsible for posting sings.

Warning signs may be posted at all approaches to a known or suspected hazardous area. Signs posted during any renovation or demolition practices should be the commercially available signage in compliance with Occupational Safety and Health Agency (OSHA) regulations, reading:

"DANGER:
ASBESTOS (or LEAD PAINT)
CANCER AND LUNG DISEASE HAZARD
AUTHORIZED PERSONNEL ONLY
RESPIRATORS AND PROTECTIVE CLOTHING ARE
REQUIRED IN THIS AREA"

4.7 Training

Training is an integral part of the O&M Program. When the appropriate personnel have been trained, the O&M Program can be fully implemented. All personnel should become familiar with their role in asbestos and lead-paint control within the Building and the appropriate steps to take for planned or unplanned disturbances of asbestos and lead-paint containing material. Accredited training courses approved by the US EPA generally include the following relevant topics:

- Physical characteristics of asbestos/lead and asbestos/lead containing materials;
- Potential health effects of asbestos/lead exposure;
- Establishing a medical surveillance and respiratory protection program;
- Personal protective equipment;
- Personal hygiene and precautionary measures;
- State-of-the-art work practices;
- Air monitoring;
- Federal, state, and local regulatory requirements;
- Insurance and liability issues;
- Record keeping;
- Supervisory techniques for asbestos/lead work;
- Overview of contract specifications;
- Hands on training;

- Notifications to regulatory agencies; and
- Disposal of asbestos containing material

All Building workers and Building occupants should be offered the opportunity to attend a 2-hour asbestos/lead paint awareness course. The course would generally include particular circumstances at the Building, and will include the following topics:

- Background information on asbestos/lead;
- Potential health effects of asbestos/lead exposure;
- Overview of the recognition of these hazards;
- Locations of ACM/LBP in the building;
- Name of O&M Plan Coordinator and Environmental Consultant/Availability of O&M Program; and
- How to report asbestos emergencies.

4.8 Worker Protection Program

At the discretion of the Building owner, a worker protection program may be implemented to establish written procedures for protecting employees from asbestos/lead exposure in the work environment. This may be accomplished through a combination of monitoring the actual exposure of affected employees, ensuring proper use of respirators and protective clothing, and monitoring the medical status of employees as it relates to asbestos and lead. It is important that the procedures are clear to everyone involved, and that the program is executed consistently and documented clearly. The Building owner is not responsible for providing a worker protection program for tenants.

5.0 OPERATIONS & MAINTENANCE PROCEDURES

5.1 Evaluation of Existing Asbestos Conditions

The ACM material is usually examined, and prioritized according to condition, location, and potential for damage and/or fiber release. The priorities are usually divided into the following categories:

- Low Hazard - Those non-friable materials in good condition with low potential for disturbance.
- Moderate Hazard - Those currently non-friable materials, or friable materials in fair to good condition, that have a moderate potential for disturbance or damage rendering them friable and possibly releasing asbestos fibers into the air.
- High Hazard - Those friable materials or non-friable materials that have become friable in poor condition, and/or are likely to be disturbed by air currents, water damage, construction, or other activities which may distribute airborne asbestos fibers.
- Immediate Hazard - Those friable materials or non-friable materials that have become friable, that are significantly damaged, have released material, and/or are very likely to expose unprotected persons.

5.1.1 Addressing Low and Moderate Hazards

Caution should be taken not to disturb these materials if maintenance activities require work to be conducted in close proximity to these materials.

5.1.2 Addressing High and Immediate Hazards

The following actions should be taken to address areas of ACM that may become re-classified as a high or immediate hazard.

- Warning signs shall be posted on entryways (i.e. doors, stairwells) to affected areas. These signs shall explicitly indicate that there is ACM present and that the areas are restricted. Doors shall be kept locked at all times.
- Only properly trained and licensed personnel, using appropriate personal protective equipment, shall be allowed to work in these areas. Unnecessary work in these areas shall be avoided until abatement and/or proper decontamination can be performed.
- Proper notification must be given to state and local authorities prior to initiation of ACM abatement.

Any ACM removed, or materials that have come into contact with the ACM and have potentially become contaminated with asbestos, such as cleaning cloths/rags, water, etc., shall be double-bagged in properly labeled asbestos disposal bags. These materials shall be properly disposed of in an approved landfill. Chain-of-custody manifests must be obtained from transporters of the asbestos waste materials and from the operators of the accepting landfill and kept on file by the O&M Plan Coordinator.

5.2 General Maintenance

Renovation, maintenance, construction or other activities that may disturb ACM or LBP surfaces shall be approved by the O&M Plan Coordinator. The following steps should be followed if these activities are scheduled to take place:

- Access shall be restricted to the work area by scheduling, posting warning signs, and erecting barriers.
- Workers shall use appropriate personal protective equipment, which includes respirators and disposable clothing during removal.
- A HEPA vacuum shall be immediately available to clean up any debris that may be created.
- Wet methods shall also be used to clean up the possible release of fibers and lead dust.
- Asbestos debris and cleaning materials shall be disposed of as asbestos waste. Lead paint debris and cleaning materials shall be disposed of as lead paint waste.
- Intentional removal of ACM or lead paint for the sole purpose of lead paint or asbestos abatement shall not be performed by employees or occupants of the facility. Those who conduct asbestos or lead paint maintenance activities where asbestos and lead paint threshold levels are exceeded, must be licensed abatement contractors.

The O&M Plan Coordinator shall maintain records of maintenance activities, which might disturb ACM or LBP surfaces. These records shall include a description of the work, the workers involved, controls used to reduce the potential of exposure, the results of any exposure monitoring, and disposal records for asbestos and lead paint wastes.

5.3 Work by Outside Contractors

Outside contractors performing maintenance, repair, or renovation work at the Building shall meet with the O&M Plan Coordinator and review this O&M Plan prior to performing any work. Outside contractors shall be provided with information about the locations of ACM and LBP surfaces that they might come in contact with and be allowed to examine this O&M Plan. Outside contractors shall be required to follow proper work procedures to minimize potential

disturbance to ACM and/or LBP surfaces. Such work procedures shall be outlined and approved by the O&M Plan Coordinator.

Contractors, other than approved, licensed and qualified Lead Paint or Asbestos Abatement Contractors, shall not be authorized to intentionally disturb ACM or lead-based paint surfaces at the Building.

At no time shall maintenance activities directly affecting the ACM or LBP surfaces be performed by untrained or unlicensed personnel. All maintenance activities shall be approved by the O&M Plan Coordinator. This includes activities conducted by employees, sub-contractors, or tenants of the Building.

5.4 Asbestos Fiber Release Episodes

As long as ACM remains in the Building, the potential for a fiber release episode is present. Asbestos fibers can be released either spontaneously due to aging or water damage, or through physical disturbance such as or while maintenance activities are occurring. This section describes contingency measures in the event that a fiber release does occur or is suspected of occurring.

A clear, simple, step by step plan that all trained personnel are thoroughly familiar with is essential to control the asbestos hazard as quickly and with minimal disruption. When emergencies arise, a plan will help to minimize uncertainty and delay.

Building occupants should always be on the lookout for any possible evidence of fiber release episodes, including debris on the floor near the presence of ACM, or water or physical damage to ACM. Asbestos related problems should immediately be reported directly to the O&M Plan Coordinator or reported to Building management.

Minor Fiber Release Episodes

A minor fiber release episode is one in which less than 3 square feet or 3 linear feet of friable asbestos containing material is dislodged. Minor fiber release episodes can be treated with standard wet cleaning and HEPA vacuum techniques by trained building management personnel or accredited EPA asbestos inspectors. Examples of minor fiber releases include:

- A small number of fallen or dislodged ceiling tiles.
- Three or less broken or dislodged floor tiles.
- Minor water leaks on unabated floors.

The following steps should be taken in the event of a minor fiber release episode:

- Access to the area shall be restricted immediately. This can be accomplished through the use of barriers, locking doors, or other suitable means.

- Any debris shall be thoroughly wetted with amended water and double-bagged in properly labeled asbestos disposal bags (6-mil glove bag).
- The damaged area shall be repaired with a non-asbestos material, or sealed with an encapsulating material.
- Debris, cleaning materials, filters, etc. shall be disposed of as asbestos waste.

Any minor fiber release episode shall be reported to the O&M Plan Coordinator and subsequently the environmental consultant, immediately. The O&M Plan Coordinator will keep records indicating the date of the release, the areas affected, actions taken, and chain-of-custody manifests for the disposal of the waste materials generated.

Major Fiber Release Episodes

A major fiber release episode is one in which more than 3 square feet or 3 linear feet of friable asbestos containing material is dislodged. Major fiber release episodes can be serious events, and require that licensed and certified asbestos contractors be used for clean-up and decontamination. The O&M Plan Coordinator and/or an environmental consultant should be the first ones on-site to minimize contamination and exposure to Building occupants. Examples of a major fiber release episode include, but are not limited to:

- A section of ceiling collapses on an unabated floor
- A major water leak occurs on an unabated floor

The following steps should be taken in the event of a major fiber release episode:

- To the extent possible, the area in question should be secured and sealed utilizing polyethylene sheeting as necessary. All individuals not directly involved in the maintenance work should leave the area. The HVAC system for the area in question shall be shut off and secured to prevent distribution of any fibers generated during the episode. Clean-up and/or abatement activities, as needed, should be performed only by a licensed and approved asbestos Abatement Contractor.
- The O&M Plan Coordinator shall be contacted immediately. An inspection and report of the episode specifying actions taken must be recorded.
- Persons entering the area must wear, at a minimum, disposable coveralls and an approved air-purifying respirator with HEPA cartridges.
- Two suits of disposable coveralls must be worn. The outer coverall must have an attached hood and foot coverings. Gloves should be inserted inside the coverall sleeve and taped securely to the coverall.

- After completion of the work, the outer coverall is to be removed before leaving the secured and sealed area. The outer coverall will then be placed with other contaminated materials in an appropriately labeled 6 mil asbestos disposable bag.

- The inner coverall will be HEPA-vacuumed and wet-wiped. The individual may then proceed to a change room or to an area deemed "clean" (absent of asbestos fibers).

- Upon task completion, ladders and tools should be wet-wiped while inside the secured and sealed area. All rags should be disposed of with other contaminated equipment in appropriately labeled 6 mil asbestos disposal bags. All waste materials will be required to be double-bagged.

- Additional asbestos-related precautions may be necessary and can be provided by the O&M Plan Coordinator. All precautions to prevent personnel exposure and contamination of adjacent areas must be utilized.

All actions taken in the event of a major fiber release episode shall be documented, with records maintained by the O&M Plan Coordinator.

5.5 Disposal Procedures

In most cases, ACM and/or lead paint waste will be handled by the licensed Lead Paint or Asbestos Abatement Contractor, as applicable, as part of any ACM or lead paint removal projects. In minor episodic situations (below the threshold amounts) and during normal maintenance operations, where trained maintenance or custodial staff are required to perform cleaning or minor ACM clean-up, the clothing and other materials contaminated as the result of such conditions shall be disposed of as asbestos and/or lead paint waste.

Asbestos and lead wastes shall be thoroughly wetted and double-bagged in appropriately labeled disposal bags. Bags shall be sealed airtight while the material is still wet. Bag tops shall be twisted and sealed with duct tape, then bent over and sealed again with at least three wraps of duct tape. Additional material shall not be added to bags and no bag shall be reopened after it has been sealed. Caution labels consistent with applicable state laws and regulations and in accordance with OSHA Regulations 29 CFR 1910.1001, 29 CFR 1926.1101, 29 CFR 1910.1200, and 29 CFR 1926.59 are to be placed on each container.

If waste materials are not disposed of immediately, the ACM/lead paint should be accumulated in a sealed plastic-lined fiberboard or metal drum and stored in a restricted area until transported to an authorized disposal site. This storage will be considered as a temporary measure until such time as arrangements can be made for final disposal. The available storage capacity on-site must not be exceeded. An environmental consultant can advise and coordinate the proper storage, transportation, and disposal of the waste to the O&M Plan Coordinator.

Required local, state, and federal permits shall be obtained for the transportation and disposal of ACM/lead paint related wastes. All procedures required by this document, any issued abatement specifications, and applicable law, regulations, and requirements shall be followed.

Asbestos/lead wastes shall be transported in an enclosed or covered truck and disposed of at a landfill approved for these wastes. Activities involving removal of ACM/lead waste and disposal at any landfill shall be documented. The landfill shall be duly permitted and shall acknowledge receipt of ACM or LBP waste by completing the information called for on the landfill manifest for disposal of waste at a landfill or disposal facility. A manifest document should be completed and signed by the O&M Plan Coordinator.

Here are some general step by step instructions:

1. All waste, including materials that may be contaminated by asbestos/lead such as protective suits and cloths/rags, should be placed into 6 mil plastic bags. The bags will be considered "full" when it is half filled, since material saturated with water will be much heavier. If a material has sharp edges, it may be wrapped, either by itself or in bundles, with 2 layers of 6 mil plastic sheeting.

2. Sufficient water should be added into the bag so that all of the ACM/lead paint is thoroughly wet and there is excess water (about 1 inch) in the bottom of the bag. Be sure to wet down the inside of the bag to push debris to the bottom.

3. The bag will then be sealed with duct tape so that there is not excess air in the bag. Excess air takes up space and causes the bag to be more susceptible to breakage and fiber/dust release.

4. The bag will be washed or wet wiped, placed in another 6 mil plastic bag, and sealed.

5. The bags or wrapped material will be labeled as asbestos or lead waste, with labels that read:

"DANGER:
CONTAINS ASBESTOS FIBERS (or LEAD PAINT);
AVOID CREATING DUST;
CANCER AND LUNG DISEASE HAZARD"

   Labels will be pre-printed and will comply with OSHA requirements. Originator labels will be attached to all bags of asbestos and/or lead waste with information including the name of the waste generator and the location where the waste was generated.

6. Waste bags will then be placed inside labeled drums and sealed. Labels will be pre-printed and will read:

"DANGER:
CONTAINS ASBESTOS FIBERS (or LEAD PAINT);
AVOID CREATING DUST;
CANCER AND LUNG DISEASE HAZARD"

7. Asbestos/Lead waste should be transported to the final dumpsite as soon as possible, and no later than one month after it is generated.

Transportation of Asbestos/Lead Waste

1. All companies and drivers used for transporting asbestos/lead waste should be familiar with correct waste handling procedures for these hazards.

2. Transportation of the asbestos/lead waste should be in a covered truck.

3. The O&M Plan Coordinator or an environmental consultant will obtain a chain of custody form including the name and address of the transporter, the quantity of asbestos/lead, types of containers used, and the destination of the waste.

4. The asbestos/lead waste will not leave the Building until confirmation is received that an approved landfill for asbestos/lead will accept the waste.

5. When waste is ready for transport and disposal, the O&M Plan Coordinator will ensure that all sources of the waste in the Building are recorded, and that all O&M reports are cross-referenced to the document for waste disposal.

Be advised that the O&M Plan is a "Living Document" until all ACM and Lead-Painted Components have been removed from the Building. As such, when renovation/removal activities occur, in addition to any performed emergency clean-ups, the O&M Plan must continually be updated.

Final Destination of Waste

1. All asbestos/lead waste will be deposited in a GAEPD-approved landfill for accepting this type of waste. Copies of the landfill permit should be obtained and recorded.

2. The O&M Plan Coordinator will obtain a manifest of the final disposal (waste shipment record), including name and address of landfill, EPA approval number, quantity of waste, cost, and time and location of disposal. The manifest will be signed by the landfill operator. If the landfill has a disposal receipt system, disposal receipts should be obtained and recorded into the O&M Plan.

5.6 Re-Evaluation of ACM and Lead Paint Surfaces

The physical condition of the ACM and LBP surfaces shall be performed by an EPA-accredited asbestos inspector/lead-risk assessor, management planner, or other qualified environmental consultant on an annual basis. The routine monitoring will serve to re-evaluate the materials and lead paint surfaces with regard to changes in condition, friability, and potential fiber/dust release.

Conditions such as damage due to physical abrasion, vandalism and/or water damage shall be observed and documented and the appropriate response actions delineated. This documentation should include notes, photographs, and written reports, which should be kept in the records held by the O&M Plan Coordinator.

ACM and lead paint that has been abated (removed) should also be documented and attached to this O&M Plan. Results of the inspection shall be reported to the O&M Plan Coordinator and placed at the Building's applicable file. Copies of all documentation regarding asbestos and lead paint abatement or removal should be provided to the O&M Plan Coordinator.

5.7 Routine Surveillance

Surveillance of the ACMs and lead-paint components in the Building should be conducted by qualified personnel on a routine basis to determine any change in the condition of these materials so that any corrective action can be taken. Although optional, air monitoring may also be performed (at least annually) to document indoor air quality conditions.

An annual re-inspection of in-place exposed asbestos-containing materials should be performed by an EPA-accredited Asbestos Inspector. All areas known to contain ACM will be inspected and the physical conditions of exposed materials will be assessed. This re-inspection will not include accessing above ceiling tiles where overhead ACM and lead dust is known to exist. The annual re-inspection will be performed in conjunction with air monitoring of fiber levels, if opted to do so. For the LBP, the annual re-inspection should be performed by an EPA-accredited Lead-Risk Assessor.

Recommended Surveillance Schedule

Daily: General day-to-day observations from tenants, building management employees including maintenance and custodial staff to ensure confirmed or suspect ACM and LBP remain intact and are not damaged.

Monthly or Quarterly: Inspection of suspect and confirmed ACM and LBP materials for damage by the O&M Plan Coordinator.

Annually: Inspection of suspect and confirmed ACM and LBP materials for damage by the O&M Plan Coordinator and a qualified environmental consultant. In addition, a re-evaluation and any needed modifications to the O&M Plan should be made.

5.7.1 Physical Inspection

An EPA-accredited Asbestos Inspector/Lead Risk Assessor will conduct annual surveillance of areas in the Building. They will take note of any suspect ACM/lead paint components which may have been disturbed and any ceiling tiles that may have become damaged or dislodged on unabated floors. The tours should cover each area with accessible ACM/lead paint components every 12 months.

All findings should be presented to the O&M Plan Coordinator in a letter report. The annual surveillance/re-inspection should be scheduled such that the results will be incorporated into the annual O&M Program revision.

The O&M Plan Coordinator will review the report, along with any air sampling data, and determine if corrective actions should be taken as a response to the findings. Any response actions that involve major asbestos removal need to be carefully reviewed. Response actions could include:

- Continued monitoring and surveillance by the accredited Inspector.
- Repair, removal, or cleaning of damaged material by a licensed abatement contractor.
- In areas with damaged ACM/lead paint components, restricting access to authorized personnel.

5.8 Periodic Evaluation of the O&M Program

The O&M Program will need to be evaluated and modified to reflect changes in regulations, state of the art procedures, locations of ACM/lead paint components in the Building, or surveillance data. In addition, the O&M Plan Coordinator may deem it necessary to modify elements of the Program in a variety of situations, or on-going circumstances, in the Building.

Evaluation Schedule

The O&M Program should be evaluated at the following times:

- Annually - Full evaluation by a qualified environmental consultant and the O&M Plan Coordinator. This will encompass any changes including any addendum(s) issued since the previous evaluation.
- Whenever there is a significant change in federal or state regulations or a significant change in corporate policy.

Steps to Evaluate the Program

When any of the previous situations trigger an evaluation, the O&M Plan Coordinator should consult with an EPA-accredited Management Planner or qualified environmental consultant. The O&M Plan Coordinator should possess the most complete knowledge of the day to day operations in the Building, and how effectively the Program is being implemented. The environmental consultant/management planner has the most up to date information on regulatory requirements and safety methods for handling asbestos/lead paint. They may consult, as necessary, including with any attorneys, tenants, management, or other parties as the Building management deems necessary.

Full Evaluation (Annually) Procedures:

1. The following information should be gathered before the review process begins:
    a) Changes in federal and state regulations.
    b) All area and personal air monitoring data.
    c) Periodic surveillance reports.
    d) Emergency reports.
    e) Applicable Tenant Lease requirements information.
    f) Other record keeping files.
2. The criteria for evaluating the program will be, in order of importance.
3. The health and safety of the occupants and O&M Workers in the building.
4. Compliance with regulatory requirements.
5. Practicality of the Program.

The O&M Plan Coordinator, in consultation with an environmental consultant/management planner, will review each section of the O&M Program systematically, examining the appropriate records and air monitoring data for each section. These parties will work together to identify any necessary modifications to the O&M Plan.

6.0 INTERIM CONTROL PLAN

Remodeling or renovation work to be performed should be discussed with the O&M Plan Coordinator. How these activities may affect the ACM or LBP surfaces should be evaluated and proper actions should be taken to prevent this situation prior to conducting work. If necessary, further sampling and analysis of suspect materials and painted surfaces may be required to verify asbestos or lead content.

If, at any time, unknown materials are encountered, work should stop immediately, and the O&M Plan Coordinator should be notified. Upon review of the O&M Plan, if the asbestos/lead content of the material is still unknown, it should be assumed to be positive until laboratory analysis determines the material to be non-hazardous.

6.1 Work Procedures

The work area shall be inspected for ACM/LBP prior to any work, which has the potential to disturb confirmed or suspected ACM/LBP. The O&M Plan Coordinator shall document the affected areas as asbestos and lead paint free or develop procedures to limit the disturbance of ACM and lead paint surfaces, if identified.

If material is suspected of being ACM/LBP and is disturbed, fallen and/or displaced, appropriate decontamination should be conducted as outlined in these OPERATIONS AND MAINTENANCE PROCEDURES.

No asbestos or lead paint removal should be undertaken unless performed by a licensed Lead Paint or Asbestos Abatement Contractor under Georgia law.

6.2 Work Practices

The following paragraphs describe general guidelines for the areas and activities identified. If the job activity is not described in this section, the O&M Plan Coordinator must conduct an inspection and designate the appropriate precautionary measures.

- Do not disturb or damage materials that are suspected of, or known to contain, lead paint or asbestos.
- Under no circumstances shall the removal of ACM or lead paint be undertaken without utilizing a licensed Lead Paint or Asbestos Abatement Contractor. No ACM or lead paint removal shall be undertaken without proper procedural review and appropriate precautions to prevent exposure and contamination of adjoining areas.

6.3 Repair

The areas of significantly damaged ACMs or significantly flaking and peeling lead paint surfaces should be repaired or abated as soon as possible using the following recommended procedures:

- Contract a licensed lead paint and/or asbestos Abatement Contractor, if untrained and the damage exceeds the threshold amount.
- Proper protective clothing should be worn when repairing or abating lead paint surfaces or ACMs and respiratory protection should be worn.
- Access to the area shall be restricted immediately. This can be accomplished through the use of glove bags, barriers, locking doors, or other approved means.
- Ventilation systems (HVAC) should be turned off.
- ACM/LBP debris shall be thoroughly wetted with amended water and doubled bagged in appropriately labeled disposal bags to await proper disposal.
- Damaged ACM/LBP areas shall be repaired with a non-hazardous material, or sealed with an encapsulating material.
- Debris, cleaning materials, filters, etc. shall be disposed of as asbestos or lead waste, as applicable.

7.0 PROCEDURES FOR PLANNED ACTIVITIES

This section describes special procedures for work involving small quantities of asbestos/lead paint below threshold amounts. General precautions are set forth herein. If a particular operation is significantly different from the situations described, or if an individual has questions about a particular application, he/she should consult the O&M Plan Coordinator who may consult with an environmental consultant.

Work Practices for Routine Maintenance and Custodial Operations in Which Disturbance to ACM/Lead Paint is Unlikely.

Many routine maintenance and custodial activities may be conducted without generating ACM and lead dust, but where there is a chance that ACM/LBP could be disturbed at the Building, these activities would include, for example:

- Changing light bulbs beneath a suspended ceiling;
- Working near a pipe with asbestos-containing insulation;
- Buffing/shining asbestos-containing floor tile;
- Repainting walls and ceilings that contain lead paint and asbestos in joint compound;
- HVAC activities on air handling units with asbestos-containing materials.

In each of these cases, the worker is not actually working with the asbestos, however, the potential for disturbing the ACM is present. In the second bullet, for example, the worker could inadvertently hit the elbow insulation and cause it to be damaged. The damaged elbow would contaminate the area in the general vicinity.

The following precautions should be taken when this scenario occurs, involving asbestos and lead paint below the threshold amounts:

- Worker should have received at least a 16-hour training course for asbestos and become familiar with locations of ACMs and lead in the Building.
- Worker will take extra care to avoid disturbing ACM and lead.
- Worker will contact the O&M Plan Coordinator if it is suspected that ACM and lead paint has been disturbed.
- Respirators and personal protective clothing will be immediately available in a known location in the facility to a worker trained in their use.
- HEPA vacuums and warning signs will be immediately available in a known location in the facility.

- No extra precautions need to be taken; prior approval or special scheduling from the O&M Plan Coordinator is not needed, no supervision, containment, or HVAC modification is needed as long as the ACM and/or lead paint is not disturbed.

Work Practices for Maintenance and Custodial Operations in which Disturbance to ACM is Likely

Described below are some general precautions to take when routine maintenance work is performed, which is likely, or known to disturb ACM and lead paint. Given that specific situations will vary with the exact location and work to be performed, the O&M Plan Coordinator should be familiar with the general precautions.

- The O&M Plan Coordinator will conduct an initial visit to the Building to assess the situation. Factors to be considered include:
  - The quantity and condition of ACM that will be removed (Is it greater than 3 sf or 3 lf? Is it friable? Is it significantly damaged?) or lead-paint to be disturbed;
  - ACM and lead paint adjacent to the area that could possibly be disturbed during a certain activity, and the quantity and condition of the confirmed or suspected ACM or lead- painted component;
  - Air movement in the area and how ventilation is provided to the area;
  - Any possible limitations on using a glove bag or mini-enclosure to perform the repair;
  - Current use of the area;
  - Accessibility to the area;
  - Any other hazards that are present.
- Based on the assessment, the O&M Plan Coordinator will determine whether or not the work must be performed by an outside contractor or may be performed by in-house trained personnel. He/she will also determine the methods of repair or removal to use and the type of containment to be used.
- The GAEPD must be notified within 10 working days (asbestos only) should renovation or abatement be required. Building occupants should also be notified of the planned work.
- The work will be scheduled to minimize interference with normal building operations. Access to the work area will be limited to authorized personnel, through locking the door from the inside and posting warning signs to prevent unauthorized persons from entering

the work area. Work which may be affected by operating the HVAC must be scheduled while the system is off. Any planned work in office or occupied areas should be performed outside of normal business hours.

- Most planned work involving asbestos/lead paint should be done when the ventilation system is off. Emergency work may need to be done when the ventilation system is usually on during the day. For any such work which involves friable material, the ventilation system will be turned off, and the appropriate Building staff consulted.

- Workers mitigating asbestos and lead dust hazards should always wear their assigned respirator (a minimum of a half mask respirator with HEPA filters) and head to toe protective clothing.

- All moveable objects will be removed from the vicinity of where the work is to be performed, and non-moveable objects will be covered and sealed with 6 mil polyethylene. Any objects that may have been contaminated should be thoroughly HEPA vacuumed or wet wiped. No one except those trained workers involved in the operation will remain in the work area.

- The work area will be contained in some manner. This will vary with the situation; options include using a glove bag, building a mini-enclosure with plastic sheeting, using a mobile cube enclosure, or draping plastic sheeting. Whatever the method used, the purpose is to contain any asbestos fibers/lead dust that may be released. The containment should be as foolproof as possible given the circumstances, and options can be combined for better protection. For example, when the glove bag is used in an area near a carpet or surface which would be difficult to decontaminate in the event of a fiber or dust release, it is best to use a dropcloth to protect the surface. When a dropcloth is used, it should extend at least 10 feet beyond all sides of the work area.

8.0 ROUTINE CLEANING

Routine cleaning is an important mechanism through which asbestos and lead contamination is continually removed from the Building. Preventing the accumulation of settled dust through regular cleaning reduces the level of asbestos/lead hazards in the Building by reducing the chances for resuspension of asbestos fibers and lead dust.

A regular schedule for cleaning all horizontal surfaces in the Building shall be implemented. Such cleaning shall include non-traditionally-cleaned areas as well as those traditionally-cleaned. Proper cleaning methods will be utilized at all times. In all areas where ACM/lead paint exists, normal daily cleaning procedures should be altered as necessary to ensure that fiber/dust entrainment in the air will be minimized. Sweeping, dry mopping and vacuuming will not be allowed in areas containing ACM/lead paint.

Until all ACM/lead paint is removed from the areas where it exists, all daily mopping will be carried out with dampened, disposable mop heads. These same mop heads should not be used in asbestos-/lead-free areas. All mop heads and other cleaning supplies used to clean areas where ACM/Lead dust is present should be disposed of as asbestos/lead waste.

The following are recommended cleaning methods where asbestos/lead dust is located. Other EPA and OSHA approved methods may also be used.

- Floor Tile
  - Use wet stripping methods only
  - Use mops wetted with amended water
  - DO NOT sweep with a broom
  - DO NOT lift or break tiles
  - DO NOT use dry abrasive cleaners
  - DO NOT drill, wire brush or sand
- Wall and Ceiling Plaster
  - Use rags or mops wetted with amended water to dust
  - Use a HEPA vacuum to remove or dust
  - DO NOT break tiles if removal is necessary
  - DO NOT raise or disturb drop in ceiling tiles without proper attire
  - DO NOT disturb or try to remove old mastic

- Carpet
  - HEPA vacuum
  - Shampoo
  - DO NOT use a standard type vacuum
- Window Framing and Glazing Compound
  - HEPA vacuum any debris
  - Wipe with rags wetted with amended water
  - DO NOT scrape, beat or try to remove
- Disposal

  Dispose of all asbestos debris, mop-heads, rags, filters, HEPA vacuum bags, and water obtained from shampooing in sealed, leak tight containers. DO NOT BREAK ASBESTOS/LEAD CONTAINING MATERIAL TO FIT INTO BAGS. Label as asbestos-/lead-containing material and dispose of in accordance with applicable asbestos/lead regulations.

The following cleaning schedule should be maintained in areas where there is no asbestos/lead present:

- At least one custodial person should be assigned cleaning duties per one or more floors, including all stairwells. Should this person be unable to perform his/her duties, another custodial person shall be assigned to assist with the cleaning duties;
- High, middle and low dusting of all horizontal surfaces should occur daily, utilizing pre-moistened dust cloths;
- Dry mopping, followed by wet mopping, of all tile floors will occur daily;
- Trash will be removed daily;
- Rugs will be vacuumed daily and shampooed biannually, or as necessary;
- Tile floors should be scrubbed and waxed biannually, or as necessary;
- Daily inspection of each floor should be performed by Building occupants and/or maintenance/custodial staff;
- Monthly inspections of each floor should be performed by the O&M Plan Coordinator;

- Quarterly Inspections may be performed by a qualified environmental consultant or the O&M Plan Coordinator;
- Annual physical inspection and re-evaluation of the O&M Plan performed by a qualified environmental consultant and the O&M Plan Coordinator.

8.1 Ceiling Materials

Maintaining the ceiling tiles is an important component of the overall building maintenance mission. Occupants must not suspend any items from the ceiling tiles, dislocate the ceiling tiles, or place any items that may intrude into the space above the suspended ceiling.

Suspended and plaster/gypsum board ceilings in the Building must remain intact, since these ceilings are the primary barriers between any potential sprayed-on asbestos beam coverings or hidden, overhead ACMs/lead paint components. When ceilings in the Building are intentionally or unintentionally breached, any asbestos/lead contamination on their upper surfaces may fall to occupied spaces unless appropriate safeguards are taken.

Occupants are requested to immediately report any missing, discolored, damaged, or fallen ceiling tiles to Building management or the O&M Plan Coordinator. Occupants discovering a fallen ceiling tile should not attempt to clean areas around a fallen ceiling tile or to remove the fallen ceiling tile.

8.2 Asbestos/Lead Dust Cleaning Equipment

Building management and the O&M Plan Coordinator will ensure that the following equipment and materials are in stock, clean, well maintained, and easily accessible. This will facilitate the efficient operations for any planned asbestos/lead related work, and if a fiber/dust release episode should occur, the initial response actions will be accomplished in an orderly and timely fashion.

The O&M Plan Coordinator will consult with the manufacturer to ensure that equipment and materials conform to any applicable code requirements. All manufacturer's information, instructions, and Material Safety Data Sheets will be maintained in an easily accessible file for workers to consult.

- HEPA Vacuum(s): All vacuums used in the O&M Program will be equipped with a High Efficiency Particulate Absolute (HEPA) Filter, which filters out 99.97% of fibers/dust at a size of 0.3 microns or larger.
- Airless Sprayer: An airless sprayer for application of encapsulant.
- Water Sprayer: A water sprayer that is either airless or other low pressure, with an attachment for mixing surfactant in the water.

- Ladders: OSHA approved ladders in various sizes to perform the necessary work. The ladders will be made of non-porous materials, so they may be decontaminated by wet wiping. Step ladders will be used for all free standing work.
- Plastic Drums: Drums will be made of non-porous materials, so they may be wet wiped and reused.
- Other tools and equipment: Other tools necessary or helpful for any procedure which may be carried out under the O&M Program, including hand-held scrapers, utility knives, carts, buckets, wire saws, and nylon brushes.
- Disposal Clothing Manufactured of Tyvek: Clothing will be a coverall, including head and foot cover. Latex gloves will be used for hand cover.
- HEPA cartridges for respirators will be utilized.
- Polyethylene film for containments and dropcloths. All plastic sheeting will be 6 mil thick, and will meet fire code requirements.
- Polyethylene bags with preprinted asbestos and/or lead dust caution labels, conforming to OSHA requirements, 6 mils thick.
- Duct tape (3" width) of the fabric type. Paper masking tape will not be used.
- Surfactant mixtures for saturating the ACM/lead dust. The surfactant will be commercially prepared.
- Encapsulant that is rated acceptable by the US EPA as performed by a sealant test.
- Spray adhesive for sealing poly to poly.
- Glove bags for both horizontal and vertical applications.
- Warning signs for restricting access.
- Other materials necessary or helpful for any procedure which may be carried out under the O&M Program, including sponges and clean cloths.

9.0 RECORDKEEPING

Recordkeeping is one of the most critical aspects of a comprehensive O&M Program for asbestos and lead. When all records detailed in this section are kept accurately and in an orderly fashion, the following goals will be met:

- Compliance with federal, state, and local regulatory requirements.
- Documentation will provide increased liability protection.
- Communication with employees, tenants, contractors, and regulatory agency officials will be smoother, and misunderstandings will be prevented.

General Provisions

Records related to this O&M Plan, or any asbestos-related matter, shall be maintained by the O&M Plan Coordinator for a period not less than 30 years. For most records this is required by law. Because of the long latency period of asbestos related diseases (15 to 40 years) retaining records for this long period of time is critical.

The O&M Plan Coordinator or Building Management should maintain all records, and should ensure the future maintenance of all records. All medical records should be kept on file with human resources.

One set of records should be maintained at a secure location in the Building for quick reference, and a duplicate set should be maintained at another secure location (Building management main offices). As new documents are added to the Building's O&M files on-site, a mechanism should be established to update the files at the main office location as needed to match the Building files.

All files should be treated as confidential material. Only the appropriate people should be allowed to view, and depending on the nature of the material, copy certain documents.

Files should be kept in an organized fashion so that its contents are easily accessible. Each document should be able to stand on its own if it is separated from another document. A given document that applies to more than one file will be either copied and kept in each file or cross referenced.

It is recommended that files will be separated into four major categories. All files within these categories will be separated further by subject, and documents within each file will be kept chronologically. The four major categories are:

- Building Management Employee Files;

- Operations and Maintenance Activities Files;
- Outside Contractor Files;
- Major Asbestos Abatement Files.

Building Management Employee Files

If performed, personal medical records should remain confidential and should be available to be copied upon request by any subject employee and anyone having the written consent of the employee.

This category of files may contain separate sections for:

- Communication with building management employees;
- The medical surveillance program;
- The respirator program;
- The personal air monitoring program;
- The training program;
- Individual employee documents.

Operations and Maintenance Activities Files

This category of files may contain separate sections for:

- Copies of the O&M Plan and updates;
- All internal communication, notifications, and permits;
- Periodic surveillance reports;
- Equipment and materials;
- Reports for maintenance activities involving asbestos/lead paint;
- Fiber/Dust release episodes;
- Disposal

Operations and Maintenance Plan File

The Operations and Maintenance Plan File may include:

- A copy of initial Operations and Maintenance Plan and date of implementation;

- A copy of all initial asbestos audits and surveys performed at the Building;
- A copy of any additional asbestos survey/lead-based paint survey or work performed;
- Copies of all updates of O&M Plan and dates of implementation;
- Names, qualifications, and signatures of all environmental consultants performing the surveys and O&M review services.

The Communication and Notification File

The Communication and Notification file will include:

- Notifications sent to regulatory agencies for asbestos work performed at the Building. Notifications will always use the approved form for that particular agency.
- Communication/memos to occupants of the Building. This will include:
  - Notifications to occupants of intended maintenance work involving asbestos/lead-paint.
  - Notice to occupants informing them of the existence and availability of the O&M Plan and their responsibilities under the Program.
  - Permit requests, in the form of a work request form, received from occupants for renovations, with notice to employees of approval or denial from the O&M Plan Coordinator, including any stipulations for renovations planned by occupants.
  - Standard letter to all contractors and subcontractors working in the Building, with acknowledgement of receipt, to be implemented prior to start of work in the Building.
  - Locations of all known ACM and LBP in the specific area of the Building affected by the work.
  - Notification that in order to work in areas where they may disturb asbestos/lead, the subcontractor must receive a permit for work from the O&M Plan Coordinator or his agent, possibly be accompanied by a licensed abatement contractor, and provide documentation that all respective contractors/workers have received a 16-hour training approved by the US EPA, medical surveillance and respiratory fit testing.

Periodic Surveillance File

The Periodic Surveillance Files will include:

- For all physical assessments performed:

- Name of person performing surveillance;
- Date of surveillance;
- Change in condition of ACM/lead paint components;
- Any new materials suspected of containing asbestos/lead paint, and follow-up assessments.

- For all areas where air monitoring may have been performed:
  - Name and signature of person and firm conducting sampling and analysis;
  - Sampling and analytical methods used;
  - Location and function of area sampled;
  - Duration of sample;
  - Date of sample taken;
  - Results of air sample, and any posting or notifications made;
  - If the sample is above background levels, steps taken to evaluate and correct the problem.

Equipment and Materials File

The Equipment and Materials File will include:

- A file with each type of equipment or material used in the O&M Program, including:
  - HEPA Vacuum
  - Glove Bags
  - Clean Cube
  - Respirators
  - Protective Clothing
  - Encapsulant
  - Surfactant
  - Warning Signs
  - Pumps

- Air Filter Cassettes

- For each type of equipment/material listed above, a file containing all applicable information, including:
  - Material Safety Data Sheets (MSDS);
  - Manufacturer's description and instructions;
  - Dates of use;
  - Any approval ratings by regulatory or private agencies;
  - Any repair or maintenance performed, and name of authorized person/firm who performed repair.

Maintenance Activities File

The Maintenance Activities File will include a file for each activity involving asbestos and/or lead-based paint repair or removal.

- Name and signature of person performing the activity;
- Date(s) of activity;
- Location of activity;
- Description of activities and preventive measures used;
- Quantity of asbestos/lead paint removed or disturbed;
- If asbestos/lead-paint is removed, the name and location of storage or disposal site;
- The results of any personal air monitoring conducted;
- Permit signed by O&M Plan Coordinator to proceed with work;
- If work was done by an outside subcontractor, name of company performing work, and name and signature of trained building management employee accompanying worker. Documentation of notification, training, and respirator use of outside worker should be cross referenced from the files under employees of outside contractor.

Fiber/Dust Release Episode Files (Asbestos Only)

- Minor Fiber/Dust Release Episodes Files will include:
  - Date and time of episode;

- Location of episode;
- Any persons present when episode occurred;
- Response actions taken;
- Names and signatures of workers performing work;
- Air monitoring results;
- Names and reports by any environmental consultant contacted;
- Quantity of ACM disturbed during episode;
- If asbestos was removed, name and location of storage or disposal site;
- Permit signed by O&M Plan Coordinator for performing work;
- Operations and Maintenance Activities Files.

- Major Fiber Release Episodes Files will include:
  - Date and time of episode;
  - Location of episode;
  - Any persons present when episode occurred, and any licensed abatement contractors who began initial emergency actions;
  - Quantity of ACM disturbed during episode;
  - Response actions taken;
  - Name and license and certification of abatement contractor who performed major repair/removal;
  - Names and reports by any environmental consultant who evaluated the situation, including any air monitoring results;
  - Cross references to full report of major abatement activity.

Disposal Files

The Disposal Files will include:

- For any ACM/Lead component removed, the date and cross-reference of the maintenance activity.

- Location of temporary storage in the Building, if used, and types of containers used to secure the hazards.
- Quantity of asbestos/lead removed from the maintenance activity.

Small amounts of asbestos/lead from separate activities may be grouped together and disposed of in larger amounts. Each maintenance activity or fiber/dust release episode from which ACM/LBP is removed should be cross-referenced to the final disposal documents.

For every grouping of disposal, a signed Chain of Custody form be retained, to include:

- Name and address of generator and pick-up site;
- Quantity of asbestos/lead paint disposed;
- Types of containers used;
- Destination of waste.
- Signed manifest of final disposal, including name and address of disposal site.

Outside Contractors Files

The Outside Contractors files will contain information relating to all outside contractors engaging in work which may disturb small amounts of asbestos/lead paint in the Building. The category will contain separate sections for the following:

- List of all contractors who have performed work in the Building.
- Standard letter to all subcontractors working in the Building, with acknowledgement of receipt, including:
  - Locations of all known asbestos/lead paint containing materials in the Building;
  - Notification that in order to work in areas where they may disturb asbestos/lead-paint, the subcontractor must receive a permit for work by filing required forms, and provide the O&M Plan Coordinator or his agent with documentation that all workers have received a 16-hour asbestos/lead-paint training approved by the US EPA, medical surveillance and respiratory fit testing.
- Documentation for each person performing work involving asbestos/lead paint including:
  - Copy of certificate of completion of training in a 16-hour course approved by the US EPA;
  - Certification by outside Contractor that employer and employee are in compliance with OSHA requirements.

Major Asbestos Abatement Activities Files (Asbestos Only)

The major abatement activity files will contain information relating to all asbestos activities which involve more than 3 linear or 3 square feet in the Building. The category will contain separate sections for:

- List of all contractors, and their licenses and certifications, who have performed major asbestos abatement in the Building.
- For each major asbestos activity, a file(s) with a complete report of the activity including the following:
  - Specification for the work;
  - All bidding forms, bid proposals, and contracts with the abatement contractor;
  - Name, qualifications, licenses, and certifications for all abatement contractors, all abatement foremen and workers, and all consultants;
  - Full report by the environmental consultant, including a monitoring report and all air monitoring results;
  - MSDS for all materials used on the job;
  - All submittals as required by the specification;
  - All waste disposal receipts and manifests

TABLE – BUILDING 506

Building 506 – O&M Plan Recommended Non-Abatement Techniques & Practices

Confirmed Lead-Based Paint Components	Location	Recommended Non-Abatement Techniques & Practices
Doors	**Unit A** – Entry **Unit B** – Kitchen, Main Front Entry and Basement	1. Paint with thick non-lead encapsulation paint to prevent direct contact; this paint creates a watertight bond and seals in the LBP. Some prep work may be involved per the paint manufacturer. 2. Encapsulate/Cover with an approved material; or 3. Replace Door
Door Jambs	**Unit A** – Kitchen, Dining Room and Main Front Entry **Unit B** – Kitchen, Dining Room, Main Front Entry and Basement	1. Paint with thick non-lead encapsulation paint to prevent direct contact; this paint creates a watertight bond and seals in the LBP. Some prep work may be involved per the paint manufacturer; 2. Encapsulate/Cover with an approved material; or 3. Replace Door Jamb and Door Assembly
Confirmed ACMs Components	**Location**	**Recommended Non-Abatement Techniques & Practices**
Plaster coating on Plaster Walls	Unit B First Floor	1. Prohibit Access/Use; or 2. Cover with an approved encapsulant material; or 3. Cover with and install non-asbestos wallboard and associated joint compound; or 4. Cover with and install wall panels (wood or fiberglass).
Vinyl Sheet Flooring and Associated Mastic	Kitchens of Units A & B	1. Non-asbestos vinyl sheet flooring already covers the positive underlying layers of vinyl sheet flooring and associated mastic. Continue to maintain the vinyl sheet flooring in good condition.
Floor tile and Associated Mastic	Kitchen of Unit B	1. Non-asbestos vinyl sheet flooring already covers the positive underlying layers of floor tile and associated mastic. Continue to maintain the vinyl sheet flooring in good condition.

Notes:

*Please refer to the O&M Plan & Appendix A (Figures 2 and 3) for locations in Building where LBP and ACM was identified.
**The presented techniques should be consulted with a licensed abatement contractor.

ACMs

Four samples of plaster wall were collected throughout Building 506. Of the four plaster wall samples collected, only one (1) sample contained >1% Chrysotile asbestos (Sample ID number 506B- 3). The positive plaster sample was collected from the first floor of Building 506 Unit B and contained a laboratory identified layer of plaster coating unlike the other samples collected in Building 506. Plaster walls are found throughout Building 506 Unit B either exposed or encapsulated behind a layer of non-asbestos containing gypsum wallboard. Therefore, Oasis concludes that the asbestos-containing plaster coating is apparently minimal and limited to the first floor of Building 506 Unit B.

The positive plaster coating found on the top layer of plaster wall samples appears to be in good condition. ACMs must be maintained in good condition and shall not be disturbed if abatement is not performed. If elected, non-abatement techniques presented in the table above may be considered to minimize direct contact.

All positive layers of vinyl sheet flooring, floor tile and their associated mastics sampled from Building 506 consisted of older generations of flooring beneath non-asbestos vinyl sheet flooring. Therefore, the asbestos-containing flooring is already encapsulated. It is recommended that the vinyl sheet flooring be maintained in order to remain in good condition.

LBP

The existing components above contain lead-based paint and have paint peeling and/or flaking that should be addressed prior to building occupancy. These painted surfaces may be covered or encapsulated, or repainted with a thick non-lead encapsulation paint product. If elected, these painted building materials may instead be removed/replaced (abated) by a licensed abatement contractor.

APPENDIX A
FIGURES

Legend		Figure 1 – Site Location Map	Scale
Map Source: Google Earth	N	Building #506 Former Fort McPherson Army Base Atlanta, Fulton County, Georgia	**SCALE:** Not to Scale
Imagery Date: 2015		**Oasis Consulting Services** 45 Woodstock Street Roswell, Georgia 30075	
Project No.: 163766	**Drawn by:** AB		

LEGEND

1 ASBESTOS SAMPLE LOCATION

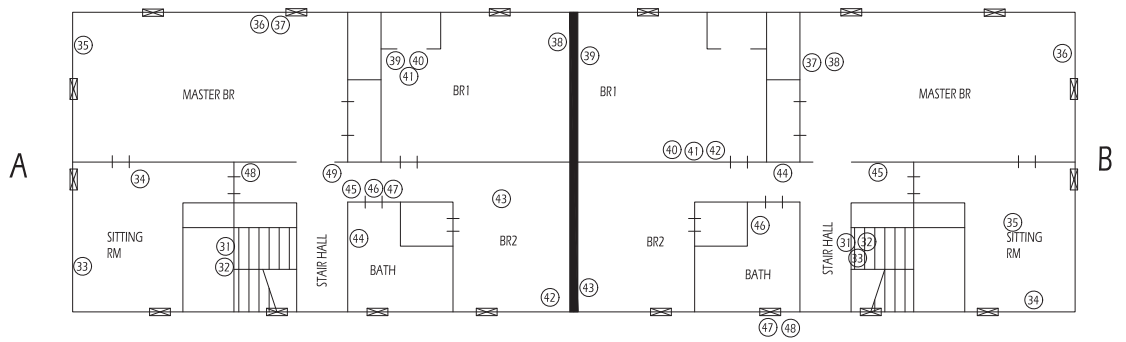
2 POSITIVE ASBESTOS SAMPLE LOCATION

FIGURE 2
FORT MCPHERSON - ACM
SAMPLING LOCATION PLAN
BUILDING 506
ATLANTA, FULTON COUNTY, GA

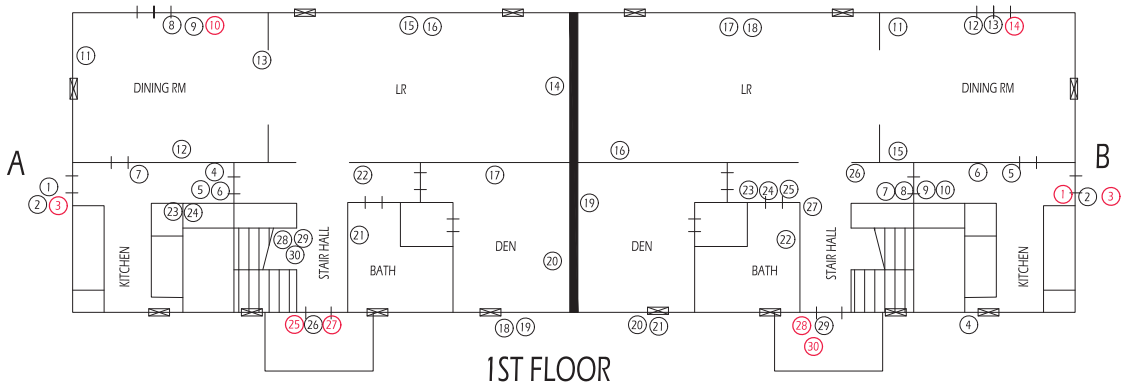
OASIS CONSULTING SERVICES
45 WOODSTOCK STREET
ROSWELL, GEORGIA 30075
PHONE: (678) 739-2400
FAX: (770) 552-5550

DATE:	9/25/17	SCALE:	NTS
PROJECT NO.	163766	FILE NO.	Ft Mac LRA 506-605
DOCUMENT NO.		FIGURE NO.	2

G:\FT MCPHERSON LRA 2017\BLDG 168-171\FT MAC LRA 506-605



2ND FLOOR



1ST FLOOR

BASEMENT

LEGEND

1 XRF LEAD-BASED PAINT SAMPLE LOCATION

2 POSITIVE XRF LEAD-BASED PAINT SAMPLE LOCATION

FIGURE 3
FORT MCPHERSON - LEAD-BASED PAINT
SAMPLING LOCATION PLAN
BUILDING 506
ATLANTA, FULTON COUNTY, GA

OASIS CONSULTING SERVICES
45 WOODSTOCK STREET
ROSWELL, GEORGIA 30075
PHONE: (678) 739-2400
FAX: (770) 552-5550

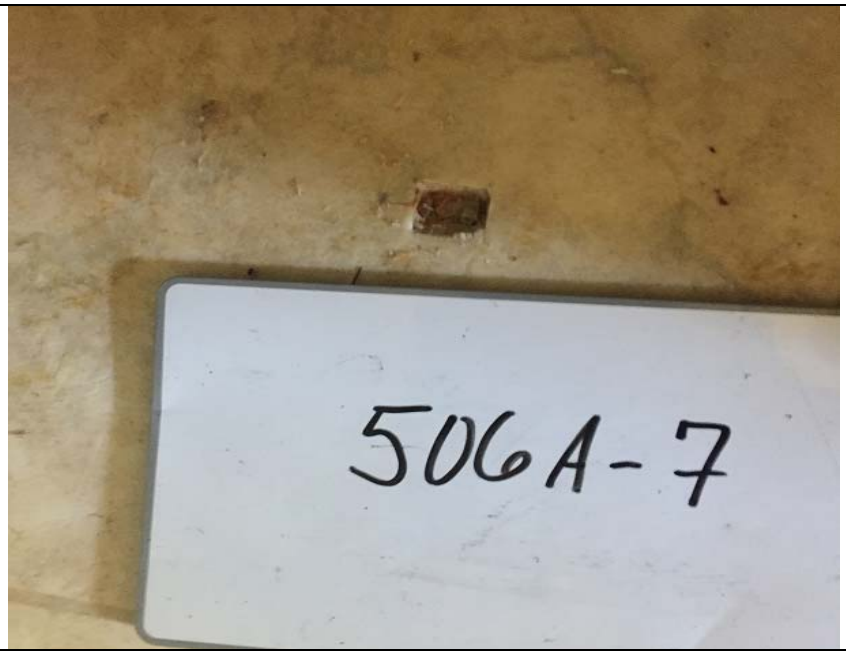
DATE:	9/25/17	SCALE:	NTS
PROJECT NO.	163766	FILE NO	Ft Mac LRA 506-605
DOCUMENT NO.		FIGURE NO.	3

G:\FT MCPHERSON LRA 2017\BLDG 168-171\FT MAC LRA 506-605

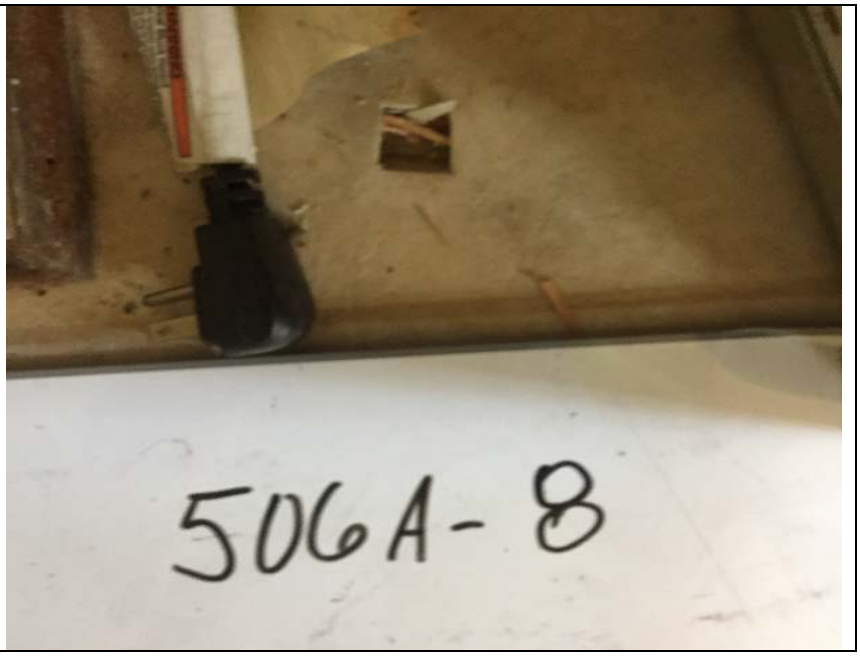
APPENDIX B
PHOTOGRAPHIC LOG

Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 1 **Description:** Representative view of Building 506.	

Photograph: 2 **Description:** Gray vinyl sheet flooring with mastic sampled from the Kitchen of Building 506 Unit A.	

Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 3 **Description:** Gray vinyl sheet flooring with mastic sampled from the Kitchen of Building 506 Unit A.	

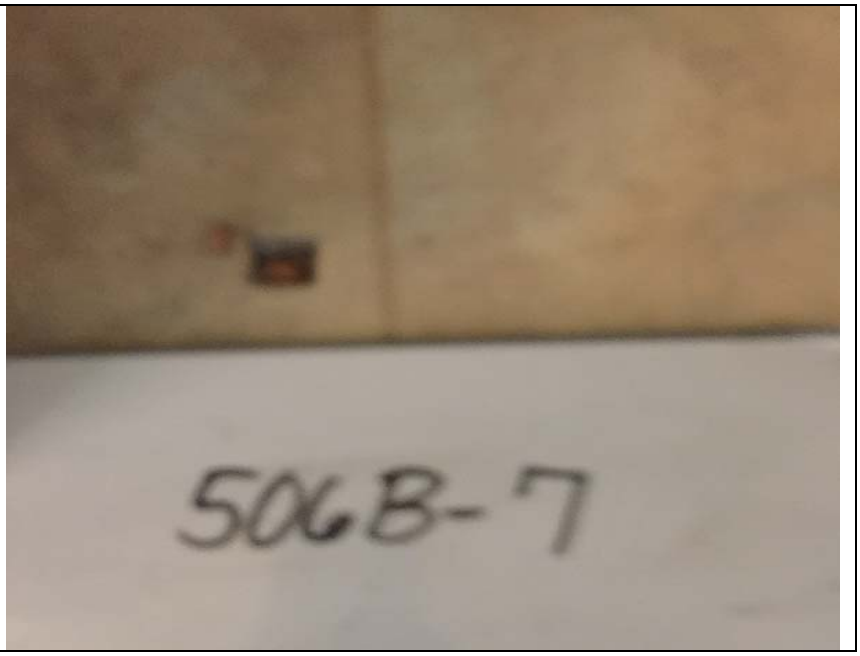
Photograph: 4 **Description:** View of the Kitchen in Building 506 Unit A where gray vinyl sheet flooring with mastic was sampled.	

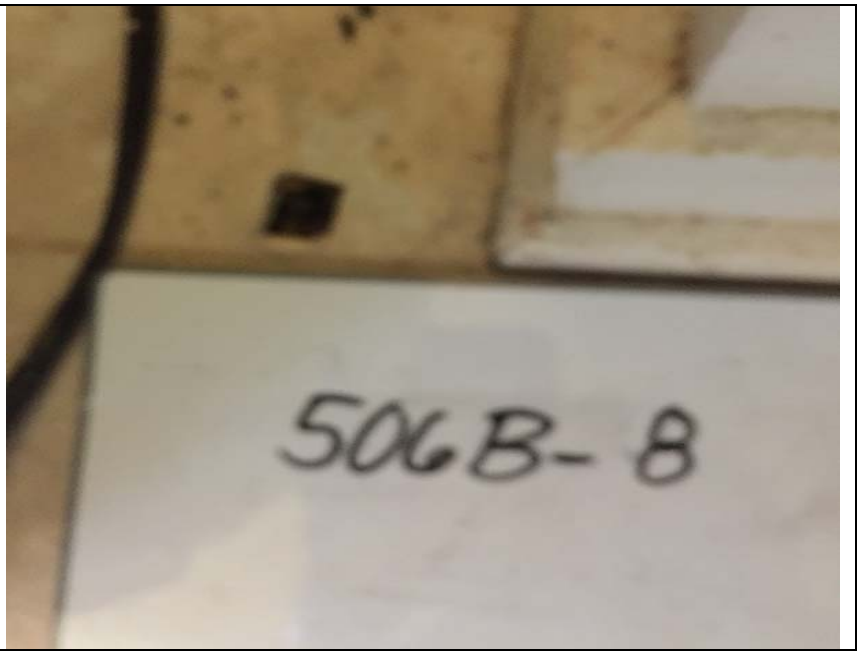
Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 5 **Description:** Plaster wall with coating sampled from the Living Room of Building 506 Unit B.	

Photograph: 6 **Description:** View of the Living Room in Building 506 Unit B where plaster wall with coating was sampled.	

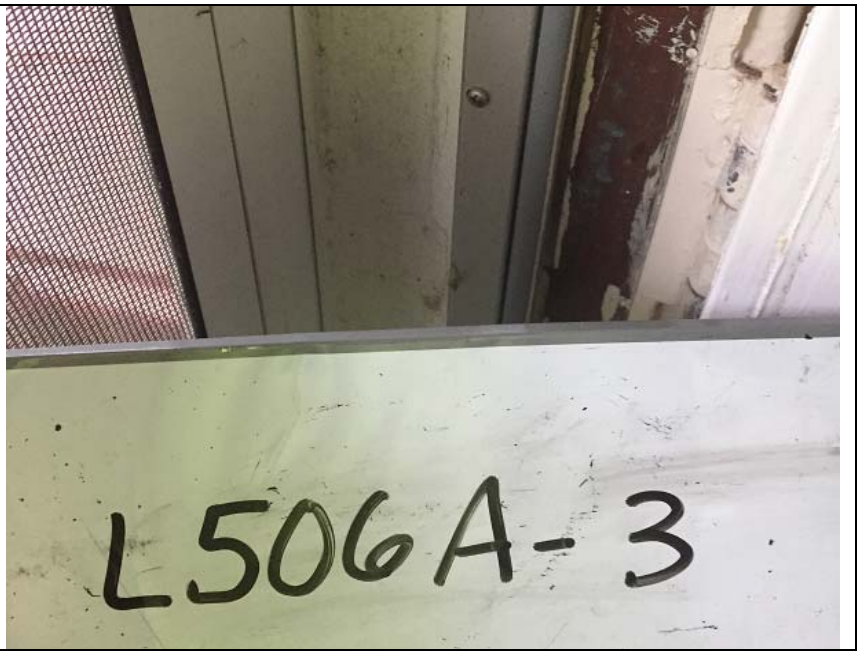
Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 7 **Description:** Gray vinyl sheet flooring with mastic sampled from the Kitchen of Building 506 Unit B.	

Photograph: 8 **Description:** Gray vinyl sheet flooring with mastic sampled from the Kitchen of Building 506 Unit B.	

Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 9 **Description:** View of the Kitchen in Building 506 Unit B where gray vinyl sheet flooring with mastic was sampled.	

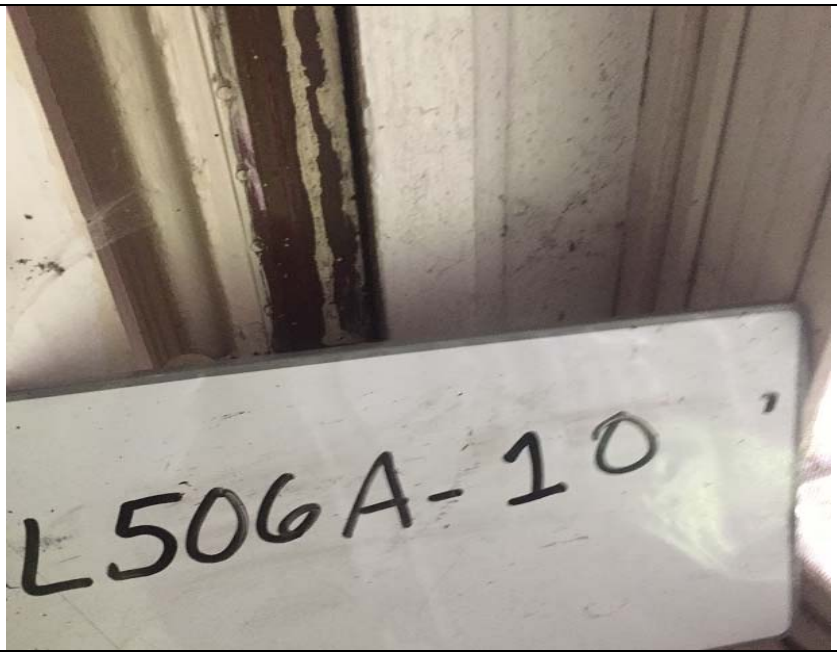
Photograph: 10 **Description:** Lead-based paint found on white wooden door jamb in the Kitchen of Building 506 Unit A.	

Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 11 **Description:** View of door where lead-based paint was found on white wooden door jamb.	

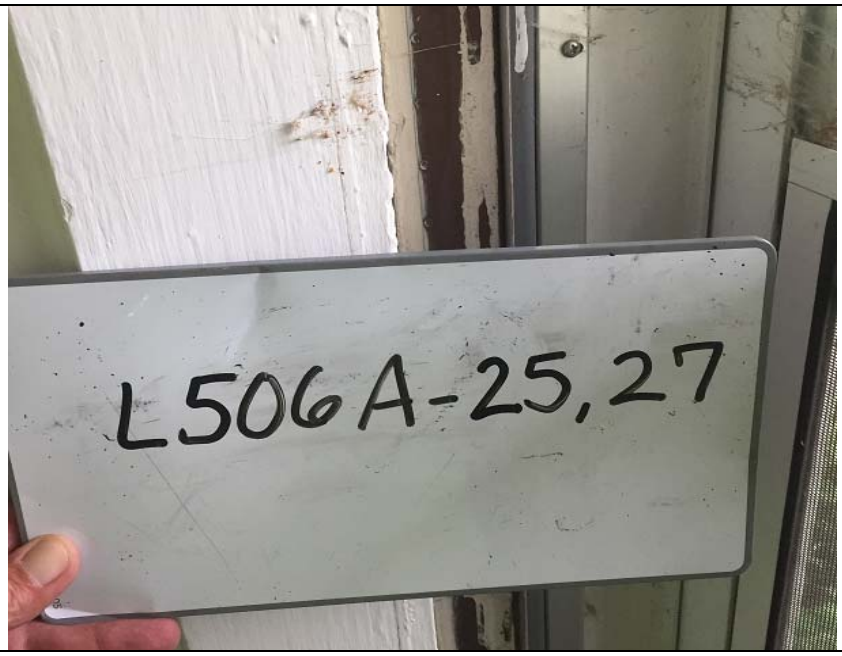
Photograph: 12 **Description:** View of Kitchen in Building 506 Unit A where lead-based paint was found.	

Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 13 **Description:** Lead-based paint found on white wooden door jamb in the Dining Room of Building 506 Unit A.	

Photograph: 14 **Description:** View of door in Dining Room of Building 506 Unit A where lead-based paint was found.	

Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 15 **Description:** Lead-based paint found on white wooden door and door jamb in the Entry of Building 506 Unit A.	

Photograph: 16 **Description:** View of door in Entry of Building 506 Unit A where lead-based paint was found.	

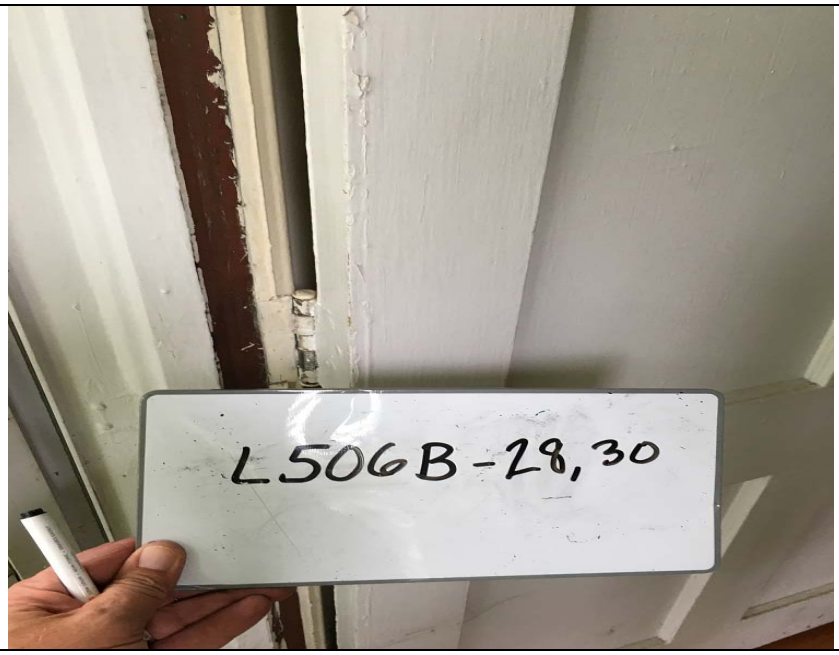
Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 17 **Description:** View of lead-based paint found on white wooden door and door jamb in the Kitchen of Building 506 Unit B (Sample IDs L506B-1 and L506B-3).	

Photograph: 18 **Description:** View of Kitchen in Building 506 Unit B where lead-based paint was found.	

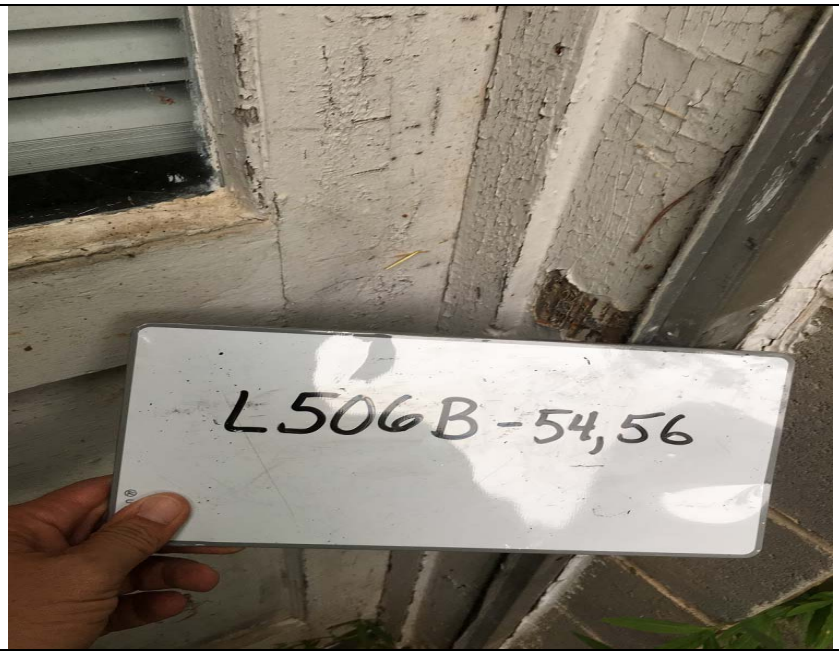
Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 19 **Description:** View of lead-based paint found on white wooden door jamb in the Dining Room of Building 506 Unit B (Sample ID L506B-14).	

Photograph: 20 **Description:** Lead-based paint found on white wooden door and door jamb in the Entry of Building 506 Unit B.	

Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 21 **Description:** View of door in Entry of Building 506 Unit B where lead-based paint was found.	

Photograph: 22 **Description:** Lead-based paint found on white wooden door and door jamb in the Basement of Building 506 Unit B.	

Photographic Log
Asbestos and Lead-Based Paint Operations & Maintenance Plan
Fort McPherson - Building 506
Atlanta, Fulton County, Georgia
Oasis Project No. 163766

Photograph: 23 **Description:** View of door in Basement of Building 506 Unit B where lead-based paint was found.	

Photograph: 24 **Description:** View of known and encapsulated ACM in Basement of Building 506.	

APPENDIX C
LABORATORY ANALYTICAL DATA

September 6, 2017

Oasis Consulting Services
45 Woodstock Street
Roswell, GA 30075

CLIENT PROJECT: Ft. Mac 18 Buildings; Building 506 A & B
CEI LAB CODE: B17-2186

Dear Customer:

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on August 29, 2017. The samples were analyzed for asbestos using polarizing light microscopy (PLM) per the EPA 600 Method.

Sample results containing >1% asbestos are considered asbestos-containing materials (ACMs) per EPA regulatory requirements. The detection limit for the EPA 600 Method is <1% asbestos by weight as determined by visual estimation.

Thank you for your business and we look forward to continuing good relations. If you have any questions, please feel free to call our office at 919-481-1413.

Kind Regards,

Tianbao Bai, Ph.D., CIH
Laboratory Director

NVLAP TESTING
NVLAP LAB CODE 101768-0

ASBESTOS ANALYTICAL REPORT
By: Polarized Light Microscopy

Prepared for

Oasis Consulting Services

CLIENT PROJECT: Ft. Mac 18 Buildings; Building 506 A & B

CEI LAB CODE: B17-2186

TEST METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

REPORT DATE: 09/06/17

TOTAL SAMPLES ANALYZED: 17

SAMPLES >1% ASBESTOS: 11

TEL: 866-481-1412

www.ceilabs.com

Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

PROJECT: Ft. Mac 18 Buildings; Building 506 A & B **CEI LAB CODE:** B17-2186

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
506A-1	Layer 1	B2450182	White	Gypsum Board	None Detected
	Layer 2	B2450182	White	Tape	None Detected
	Layer 3	B2450182	White	Joint Compound	None Detected
506A-2	Layer 1	B2450183	White	Gypsum Board	None Detected
	Layer 2	B2450183	White	Tape	None Detected
	Layer 3	B2450183	White	Joint Compound	None Detected
506A-3	Layer 1	B2450184	White	Plaster Skim Coat	None Detected
	Layer 2	B2450184	Gray	Plaster Base Coat	None Detected
506A-4	Layer 1	B2450185	White	Plaster Skim Coat	None Detected
	Layer 2	B2450185	Gray	Plaster Base Coat	None Detected
506A-5		B2450186A	Brown	Floor Tile	None Detected
		B2450186B	Yellow	Mastic	None Detected
		B2450186C	Tan	Floor Tile	None Detected
		B2450186D	Black	Mastic	None Detected
506A-6		B2450187A	Brown	Floor Tile	None Detected
		B2450187B	Yellow	Mastic	None Detected
		B2450187C	Tan	Floor Tile	None Detected
		B2450187D	Black	Mastic	None Detected
506A-7	Layer 1	B2450188A	Gray	Vinyl Flooring	None Detected
	Layer 2	B2450188A	Gray	Mastic	None Detected
		B2450188B	Brown	Vinyl Flooring	None Detected
	Layer 1	B2450188C	Red,Brown	Vinyl Flooring	**Chrysotile 25%**
	Layer 2	B2450188C	Gray	Mastic	**Chrysotile 3%**
		B2450188D	Yellow,Brown	Vinyl Flooring	**Chrysotile 25%**
506A-8	Layer 1	B2450189A	Gray	Vinyl Flooring	None Detected
	Layer 2	B2450189A	Gray	Mastic	None Detected
		B2450189B	Brown	Vinyl Flooring	None Detected
		B2450189C	Red,Brown	Vinyl Flooring	**Chrysotile 25%**
		B2450189D	Yellow,Brown	Vinyl Flooring	**Chrysotile 25%**
506B-1	Layer 1	B2450190	Gray	Gypsum Board	None Detected
	Layer 2	B2450190	White	Tape	None Detected

Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

PROJECT: Ft. Mac 18 Buildings; Building 506 A & B **CEI LAB CODE:** B17-2186

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
	Layer 3	B2450190	White	Joint Compound	None Detected
	Layer 4	B2450190	White	Joint Compound	None Detected
	Layer 5	B2450190	White	Joint Compound	None Detected
506B-2	Layer 1	B2450191	Gray	Gypsum Board	None Detected
	Layer 2	B2450191	White	Tape	None Detected
	Layer 3	B2450191	White	Joint Compound	None Detected
	Layer 4	B2450191	White	Joint Compound	None Detected
506B-3	Layer 1	B2450192	Off-white	Plaster Coating	Chrysotile 2%
	Layer 2	B2450192	White	Plaster Skim Coat	None Detected
	Layer 3	B2450192	Gray	Plaster Base Coat	None Detected
506B-4	Layer 1	B2450193	White	Plaster Skim Coat	None Detected
	Layer 2	B2450193	Gray	Plaster Base Coat	None Detected
506B-5		B2450194A	Brown	Floor Tile	None Detected
		B2450194B	Yellow	Mastic	None Detected
		B2450194C	Tan	Floor Tile	None Detected
506B-6		B2450195A	Brown	Floor Tile	None Detected
		B2450195B	Yellow	Mastic	None Detected
		B2450195B	Black	Mastic	None Detected
		B2450195C	Tan	Floor Tile	None Detected
506B-7	Layer 1	B2450196A	Gray	Vinyl Sheet Flooring	None Detected
	Layer 2	B2450196A	Gray	Mastic	None Detected
		B2450196B	Gray	Vinyl Sheet Flooring	Chrysotile 25%
		B2450196B	Black	Mastic	None Detected
		B2450196C	White	Floor Tile	Chrysotile 5%
		B2450196D	Black	Mastic	Chrysotile 2%
		B2450196E	Brown	Vinyl Sheet Flooring	None Detected
		B2450196F	Red,Brown	Vinyl Sheet Flooring	None Detected
506B-8	Layer 1	B2450197A	Gray	Vinyl Sheet Flooring	None Detected
	Layer 2	B2450197A	Gray	Mastic	None Detected
		B2450197B	Gray	Vinyl Sheet Flooring	Chrysotile 25%
		B2450197C	Yellow	Floor Tile	Chrysotile 5%

Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

PROJECT: Ft. Mac 18 Buildings; Building 506 A & B **CEI LAB CODE:** B17-2186

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
		B2450197D	Black	Mastic	None Detected
		B2450197E	Brown	Vinyl Sheet Flooring	None Detected
		B2450197F	Red,Brown	Vinyl Sheet Flooring	None Detected
506B-9		B2450198	White	Sink Undercoating	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Oasis Consulting Services
45 Woodstock Street
Roswell, GA 30075

CEI Lab Code: B17-2186
Date Received: 08-29-17
Date Analyzed: 09-06-17
Date Reported: 09-06-17

Project: Ft. Mac 18 Buildings; Building 506 A & B

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
506A-1	Gypsum Board	Heterogeneous	15%	Cellulose	85%	Gypsum	None Detected
Layer 1		White					
B2450182		Fibrous					
		Bound					
Layer 2	Tape	Heterogeneous	100%	Cellulose			None Detected
B2450182		White					
		Fibrous					
		Bound					
Layer 3	Joint Compound	Heterogeneous			10%	Paint	None Detected
B2450182		White			45%	Calc Carb	
		Non-fibrous			45%	Binder	
		Bound					
506A-2	Gypsum Board	Heterogeneous	15%	Cellulose	85%	Gypsum	None Detected
Layer 1		White					
B2450183		Fibrous					
		Bound					
Layer 2	Tape	Heterogeneous	100%	Cellulose			None Detected
B2450183		White					
		Fibrous					
		Bound					
Layer 3	Joint Compound	Heterogeneous			10%	Paint	None Detected
B2450183		White			45%	Calc Carb	
		Non-fibrous			45%	Binder	
		Bound					
506A-3	Plaster Skim Coat	Heterogeneous			10%	Paint	None Detected
Layer 1		White			45%	Calc Carb	
B2450184		Non-fibrous			45%	Binder	
		Bound					

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Oasis Consulting Services
45 Woodstock Street
Roswell, GA 30075

CEI Lab Code: B17-2186
Date Received: 08-29-17
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Project: Ft. Mac 18 Buildings; Building 506 A & B

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
Layer 2 B2450184	Plaster Base Coat	Heterogeneous Gray Non-fibrous Bound	<1%	Cellulose	35% 65% <1%	Binder Silicates Vermiculite	None Detected
506A-4 Layer 1 B2450185	Plaster Skim Coat	Heterogeneous White Non-fibrous Bound			10% 45% 45%	Paint Calc Carb Binder	None Detected
Layer 2 B2450185	Plaster Base Coat	Heterogeneous Gray Non-fibrous Bound	<1%	Cellulose	35% 65% <1%	Binder Silicates Vermiculite	None Detected
506A-5 B2450186A	Floor Tile	Heterogeneous Brown Non-fibrous Bound			100%	Vinyl	None Detected
B2450186B	Mastic	Heterogeneous Yellow Fibrous Bound	3%	Cellulose	97%	Mastic	None Detected
B2450186C	Floor Tile	Heterogeneous Tan Fibrous Bound	3%	Talc	97%	Vinyl	None Detected
B2450186D	Mastic	Heterogeneous Black Fibrous Bound	35%	Cellulose	65%	Tar	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Oasis Consulting Services
45 Woodstock Street
Roswell, GA 30075

CEI Lab Code: B17-2186
Date Received: 08-29-17
Date Analyzed: 09-06-17
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Project: Ft. Mac 18 Buildings; Building 506 A & B

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
506A-6 B2450187A	Floor Tile	Heterogeneous Brown Non-fibrous Bound			100%	Vinyl	None Detected
B2450187B	Mastic	Heterogeneous Yellow Fibrous Bound	3%	Cellulose	97%	Mastic	None Detected
B2450187C	Floor Tile	Heterogeneous Tan Fibrous Bound	3%	Talc	97%	Vinyl	None Detected
B2450187D	Mastic	Heterogeneous Black Fibrous Bound	35%	Cellulose	65%	Tar	None Detected
506A-7 Layer 1 B2450188A	Vinyl Flooring	Heterogeneous Gray Fibrous Bound	25%	Cellulose	50% 25%	Vinyl Binder	None Detected
Layer 2 B2450188A	Mastic	Heterogeneous Gray Fibrous Bound	5%	Cellulose	95%	Mastic	None Detected
B2450188B	Vinyl Flooring	Heterogeneous Brown Fibrous Bound	25%	Cellulose	50% 25%	Vinyl Binder	None Detected

ASBESTOS BULK ANALYSIS

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Client: Oasis Consulting Services
45 Woodstock Street
Roswell, GA 30075

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Project: Ft. Mac 18 Buildings; Building 506 A & B

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
Layer 1 B2450188C	Vinyl Flooring	Heterogeneous Red,Brown Fibrous Bound			50% 25%	Vinyl Binder	25% Chrysotile
Layer 2 B2450188C	Mastic	Heterogeneous Gray Fibrous Bound			97%	Mastic	3% Chrysotile
B2450188D	Vinyl Flooring	Heterogeneous Yellow,Brown Fibrous Bound			50% 25%	Vinyl Binder	25% Chrysotile
506A-8 Layer 1 B2450189A	Vinyl Flooring	Heterogeneous Gray Fibrous Bound	25%	Cellulose	50% 25%	Vinyl Binder	None Detected
Layer 2 B2450189A	Mastic	Heterogeneous Gray Fibrous Bound	5%	Cellulose	95%	Mastic	None Detected
B2450189B	Vinyl Flooring	Heterogeneous Brown Fibrous Bound	25%	Cellulose	50% 25%	Vinyl Binder	None Detected
B2450189C	Vinyl Flooring	Heterogeneous Red,Brown Fibrous Bound			50% 25%	Vinyl Binder	25% Chrysotile

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Oasis Consulting Services
45 Woodstock Street
Roswell, GA 30075

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Project: Ft. Mac 18 Buildings; Building 506 A & B

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
B2450189D	Vinyl Flooring	Heterogeneous Yellow,Brown Fibrous Bound			50% 25%	Vinyl Binder	25% Chrysotile
506B-1 Layer 1 B2450190	Gypsum Board	Heterogeneous Gray Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 B2450190	Tape	Heterogeneous White Fibrous Bound	100%	Cellulose			None Detected
Layer 3 B2450190	Joint Compound	Heterogeneous White Non-fibrous Bound			10% 45% 45%	Paint Calc Carb Binder	None Detected
Layer 4 B2450190	Joint Compound	Heterogeneous White Non-fibrous Bound			10% 45% 45%	Paint Calc Carb Binder	None Detected
Layer 5 B2450190	Joint Compound	Heterogeneous White Non-fibrous Bound			10% 45% 45%	Paint Calc Carb Binder	None Detected
506B-2 Layer 1 B2450191	Gypsum Board	Heterogeneous Gray Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Oasis Consulting Services
45 Woodstock Street
Roswell, GA 30075

CEI Lab Code: B17-2186
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Date Analyzed: 09-06-17
Date Reported: 09-06-17

Project: Ft. Mac 18 Buildings; Building 506 A & B

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		NON-ASBESTOS COMPONENTS Non-Fibrous		ASBESTOS %
Layer 2 B2450191	Tape	Heterogeneous White Fibrous Bound	100%	Cellulose			None Detected
Layer 3 B2450191	Joint Compound	Heterogeneous White Non-fibrous Bound			10% 45% 45%	Paint Calc Carb Binder	None Detected
Layer 4 B2450191	Joint Compound	Heterogeneous White Non-fibrous Bound			10% 45% 45%	Paint Calc Carb Binder	None Detected
506B-3 Layer 1 B2450192	Plaster Coating	Heterogeneous Off-white Fibrous Bound			10% 45% 43%	Paint Calc Carb Binder	**2% Chrysotile**
Layer 2 B2450192	Plaster Skim Coat	Heterogeneous White Non-fibrous Bound			10% 45% 45%	Paint Calc Carb Binder	None Detected
Layer 3 B2450192	Plaster Base Coat	Heterogeneous Gray Non-fibrous Bound	<1%	Cellulose	35% 65%	Binder Silicates	None Detected
506B-4 Layer 1 B2450193	Plaster Skim Coat	Heterogeneous White Non-fibrous Bound			10% 45% 45%	Paint Calc Carb Binder	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Oasis Consulting Services
45 Woodstock Street
Roswell, GA 30075

CEI Lab Code: B17-2186
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Date Reported: 09-06-17

Project: Ft. Mac 18 Buildings; Building 506 A & B

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
Layer 2 B2450193	Plaster Base Coat	Heterogeneous Gray Non-fibrous Bound	<1%	Cellulose	35% 65%	Binder Silicates	None Detected
506B-5 B2450194A	Floor Tile	Heterogeneous Brown Non-fibrous Bound			100%	Vinyl	None Detected
B2450194B	Mastic	Heterogeneous Yellow Non-fibrous Bound	3%	Cellulose	97%	Mastic	None Detected
B2450194C	Floor Tile	Heterogeneous Tan Fibrous Bound	3%	Talc	97%	Vinyl	None Detected
506B-6 B2450195A	Floor Tile	Heterogeneous Brown Non-fibrous Bound			100%	Vinyl	None Detected
B2450195B	Mastic	Heterogeneous Yellow Non-fibrous Bound	3%	Cellulose	97%	Mastic	None Detected
B2450195B	Mastic	Heterogeneous Black Non-fibrous Bound	35%	Cellulose	65%	Mastic	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Oasis Consulting Services
45 Woodstock Street
Roswell, GA 30075

CEI Lab Code: B17-2186
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Date Reported: 09-06-17

Project: Ft. Mac 18 Buildings; Building 506 A & B

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
B2450195C	Floor Tile	Heterogeneous Tan Fibrous Bound	3%	Talc	97%	Vinyl	None Detected
506B-7 Layer 1 B2450196A	Vinyl Sheet Flooring	Heterogeneous Gray Fibrous Bound	25%	Cellulose	25% 50%	Binder Vinyl	None Detected
Layer 2 B2450196A	Mastic	Heterogeneous Gray Fibrous Bound	5%	Cellulose	95%	Mastic	None Detected
B2450196B	Vinyl Sheet Flooring	Heterogeneous Gray Fibrous Bound			25% 50%	Binder Vinyl	**25% Chrysotile**
B2450196B	Mastic	Heterogeneous Black Non-fibrous Bound	35%	Cellulose	65%	Mastic	None Detected
B2450196C	Floor Tile	Heterogeneous White Fibrous Bound			95%	Vinyl	**5% Chrysotile**
B2450196D	Mastic	Heterogeneous Black Fibrous Bound	3%	Cellulose	95%	Mastic	**2% Chrysotile**

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

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45 Woodstock Street
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CEI Lab Code: B17-2186
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Project: Ft. Mac 18 Buildings; Building 506 A & B

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
B2450196E	Vinyl Sheet Flooring	Heterogeneous Brown Fibrous Bound	25%	Cellulose	25% 50%	Binder Vinyl	None Detected
B2450196F	Vinyl Sheet Flooring	Heterogeneous Red,Brown Fibrous Bound	25%	Cellulose	25% 50%	Binder Vinyl	None Detected
506B-8 Layer 1 B2450197A	Vinyl Sheet Flooring	Heterogeneous Gray Fibrous Bound	25%	Cellulose	25% 50%	Binder Vinyl	None Detected
Layer 2 B2450197A	Mastic	Heterogeneous Gray Fibrous Bound	5%	Cellulose	95%	Mastic	None Detected
B2450197B	Vinyl Sheet Flooring	Heterogeneous Gray Fibrous Bound			25% 50%	Binder Vinyl	**25% Chrysotile**
B2450197C	Floor Tile	Heterogeneous Yellow Fibrous Bound			95%	Vinyl	**5% Chrysotile**
B2450197D	Mastic	Heterogeneous Black Fibrous Bound	35%	Cellulose	65%	Mastic	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Oasis Consulting Services
45 Woodstock Street
Roswell, GA 30075

CEI Lab Code: B17-2186
Date Received: 08-29-17
Date Analyzed: 09-06-17
Date Reported: 09-06-17

Project: Ft. Mac 18 Buildings; Building 506 A & B

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		 Non-Fibrous		ASBESTOS %
B2450197E	Vinyl Sheet Flooring	Heterogeneous Brown Fibrous Bound	25% 	Cellulose 	25% 50%	Binder Vinyl	None Detected
B2450197F	Vinyl Sheet Flooring	Heterogeneous Red,Brown Fibrous Bound	25% 	Cellulose 	25% 50%	Binder Vinyl	None Detected
506B-9 B2450198	Sink Undercoating	Heterogeneous White Fibrous Bound	25% 	Cellulose 	75% 	Binder 	None Detected

LEGEND:

Non-Anth	= Non-Asbestiform Anthophyllite
Non-Trem	= Non-Asbestiform Tremolite
Calc Carb	= Calcium Carbonate

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

REPORTING LIMIT: <1% by visual estimation

REPORTING LIMIT FOR POINT COUNTS: 0.25% by 400 Points or 0.1% by 1,000 Points

REGULATORY LIMIT: >1% by weight

Due to the limitations of the EPA 600 method, nonfriable organically bound materials (NOBs) such as vinyl floor tiles can be difficult to analyze via polarized light microscopy (PLM). EPA recommends that all NOBs analyzed by PLM, and found not to contain asbestos, be further analyzed by Transmission Electron Microscopy (TEM). Please note that PLM analysis of dust and soil samples for asbestos is not covered under NVLAP accreditation. Estimated measurement of uncertainty is available on request.

This report relates only to the samples tested or analyzed and may not be reproduced, except in full, without written approval by CEI Labs, Inc. CEI Labs makes no warranty representation regarding the accuracy of client submitted information in preparing and presenting analytical results. Interpretation of the analytical results is the sole responsibility of the client. Samples were received in acceptable condition unless otherwise noted. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

ANALYST: Mikaela Batta

APPROVED BY: Tianbao Bai, Ph.D., CIH
Laboratory Director

NVLAP TESTING
NVLAP LAB CODE 101768-0

ASBESTOS CHAIN OF CUSTODY

CEI LABS
730 SE Maynard Road, Cary, NC 27511
Tel: 866-481-1412; Fax: 919-481-1442

LAB USE ONLY: (17)
CEI Lab Code: B17-2186
CEI Lab I.D. Range: B250182 - 250198

COMPANY INFORMATION	PROJECT INFORMATION
CEI CLIENT #:	Job Contact: Ashley Butterfield
Company: Oasis Consulting Services	Email / Tel:
Address: 45 Woodstock St. Roswell GA	Project Name: Ft. Mac 18 Buildings
	Project ID#: Building 506 A & B
Email: abutterfield@oasis-cs.com	PO #:
Tel: 678-739-2400 Fax: 770-552-5550	STATE SAMPLES COLLECTED IN: GA

IF TAT IS NOT MARKED STANDARD 3 DAY TAT APPLIES.

ASBESTOS	METHOD	TURN AROUND TIME					
		4 HR	8 HR	24 HR	2 DAY	3 DAY	5 DAY
PLM BULK	EPA 600	☐	☐	☐	☐	☐	☑
PLM POINT COUNT (400)	EPA 600	☐	☐	☐	☐	☐	☐
PLM POINT COUNT (1000)	EPA 600	☐	☐	☐	☐	☐	☐
PLM GRAV w POINT COUNT	EPA 600		☐	☐	☐	☐	☐
PLM BULK	CARB 435		☐	☐	☐	☐	☐
PCM AIR	NIOSH 7400	☐	☐	☐	☐	☐	☐
TEM AIR	EPA AHERA	☐	☐	☐	☐	☐	☐
TEM AIR	NIOSH 7402	☐	☐	☐	☐	☐	☐
TEM AIR	ISO 10312	☐	☐	☐	☐	☐	☐
TEM AIR	ASTM 6281-09	☐	☐	☐	☐	☐	☐
TEM BULK	CHATFIELD		☐	☐	☐	☐	☐
TEM DUST WIPE	ASTM D6480-05	☐	☐	☐	☐	☐	☐
TEM DUST MICROVAC	ASTM D5755-09	☐	☐	☐	☐	☐	☐
TEM SOIL	ASTM D7521-13			☐	☐	☐	☐
TEM VERMICULITE	CINCINNATI METHOD			☐	☐	☐	☐
OTHER:		☐	☐	☐	☐	☐	☐

REMARKS / SPECIAL INSTRUCTIONS:

☑ Accept Samples
☐ Reject Samples

Relinquished By:	Date/Time	Received By:	Date/Time
			8/29/17 10:00

Samples will be disposed of 30 days after analysis

ASBESTOS SAMPLING FORM

CEI LABS

COMPANY CONTACT INFORMATION	
Company:	Job Contact:
Project Name:	
Project ID #:	Tel:

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
506A-1	Gyp WB-Tape-3/c		PLM ☑	TEM ☐
506A-2	" " "		PLM ☑	TEM ☐
506A-3	Plaster		PLM ☑	TEM ☐
506A-4	"		PLM ☑	TEM ☐
506A-5	12x12 Floor tile		PLM ☑	TEM ☐
506A-6	" "		PLM ☑	TEM ☐
506A-7	Vinyl Sheet Flooring		PLM ☑	TEM ☐
506A-8	" " "		PLM ☑	TEM ☐
			PLM ☐	TEM ☐
506B-1	Gyp WB-tape-3/c		PLM ☑	TEM ☐
506B-2	" " "		PLM ☑	TEM ☐
506B-3	Plaster		PLM ☑	TEM ☐
506B-4	"		PLM ☑	TEM ☐
506B-5	12x12 Floor Tile		PLM ☑	TEM ☐
506B-6	" " "		PLM ☑	TEM ☐
506B-7	Vinyl Sheet Flooring		PLM ☑	TEM ☐
506B-8	" " "		PLM ☑	TEM ☐
506B-9	sink undercoat		PLM ☑	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐

APPENDIX D
CERTIFICATIONS

The Environmental Institute

Ashley Butterfield

Social Security Number - XXX-XX-6944

Oasis Consulting Services - 45 Woodstock Street - Roswell, Georgia 30075

Has completed coursework and satisfactorily passed
an examination that meets all criteria required for
EPA/AHERA/ASHARA (TSCA Title II) Approved Reaccreditation

Asbestos in Buildings: Inspector Refresher

September 20, 2017
Course Date

16469
Certificate Number

September 20, 2017
Examination Date

September 19, 2018
Expiration Date

David W. Hogue - Principal Instructor / Training Manager

Rachel G. McCain - Exam Administrator

(Approved by the ABIH Certification Maintenance Committee for 1/2 CM point - Approval #11-577)

(Florida Provider Registration Number FL49-0001342 - Course #FL49-0002805)

TEI - 1841 West Oak Parkway, Suite F - Marietta, Georgia 30062 - (770) 427-3600 - www.tei-atl.com

The Environmental Institute

James Michael Lucas

Social Security Number - XXX-XX-8680

Oasis Consulting Services - 45 Woodstock Street - Roswell, Georgia 30075

Has completed coursework and satisfactorily passed
an examination that meets all criteria required for
EPA/AHERA/ASHARA (TSCA Title II) Approved Reaccreditation

Asbestos in Buildings: Inspector Refresher

February 3, 2017
Course Date

16115
Certificate Number

February 3, 2017
Examination Date

February 2, 2018
Expiration Date

David W. Hogue - Principal Instructor / Training Manager

Rachel G. McCain - Exam Administrator

(Approved by the ABIH Certification Maintenance Committee for 1/2 CM point - Approval #11-577)

(Florida Provider Registration Number FL49-0001342 - Course #FL49-0002805)

TEI - 1841 West Oak Parkway, Suite F - Marietta, Georgia 30062 - (770) 427-3600 - www.tei-atl.com

The Environmental Institute

Steve Jarvis

Social Security Number - XXX-XX-0338
Oasis Consulting Services - 45 Woodstock Street - Roswell, Georgia 30075

Has completed coursework and satisfactorily passed
an examination that meets all criteria required for
EPA/AHERA/ASHARA (TSCA Title II) Approved Reaccreditation

Asbestos in Buildings: Inspector & Management Planner Refresher

December 20, 2016
Course Date

16020
Certificate Number

December 20, 2016
Examination Date

December 19, 2017
Expiration Date

David W. Hogue - Principal Instructor / Training Manager

Rachel G. McCain - Exam Administrator

(Approved by the ABIH Certification Maintenance Committee for 1 CM point - Approval #11-583)

(Florida Provider Registration #FL49-0001342 - Inspector Ref. Course #0002805 - Mgmt. Plan Ref. Course #0002806)

TEI - 1841 West Oak Parkway, Suite F - Marietta, Georgia 30062 - (770) 427-3600 - www.tei-atl.com

APPENDIX E

NOTIFICATION LETTER EXAMPLES

Letter Examples
Tenant Agency Notification Letter

Date: _____

Address: _____

_____

Dear Tenant Agency:

This letter serves as notice that a comprehensive Operations and Maintenance Program for Asbestos and Lead Paint Management has been developed for implementation. The Program will be implemented by _____ (date). A copy of the Operations and Maintenance Plan will be sent to you under separate cover.

This letter also provides you, the Tenant Agency, the opportunity to name a primary and secondary Tenant Agency Coordinator. This individual will be responsible for communicating and coordinating all work in your space with the O&M Plan Coordinator contracted to or a full time employee of building management.

Although the implementation of an Operations and Maintenance Program is not a regulatory obligation, it is our policy to properly manage asbestos and lead paint in public buildings.

Your cooperation is required for successful implementation of the Operations and Maintenance Program. You must notify the O&M Plan Coordinator, and Building management whenever you anticipate construction in your space. The notification must include the following information:

1. Purpose of the construction?
2. Room numbers for the affected space?
3. Will work be performed above and/or on dropped ceiling tiles?
4. Will utility shafts be entered or penetrated?
5. Will interior and/or perimeter column enclosures be entered or penetrated?
6. Will floor tiles or floor tile mastics (adhesives) be disturbed?
7. Proposed schedule and duration?

Construction is defined as:

- Any activity that involves cutting, abrading, sanding, and hammering into any walls, floor or ceilings;
- Hanging of pictures;
- Moving of walls or moving and/or replacing ceiling tiles;
- Any activity that impacts the integrity of wall, floor or ceiling finishes; and
- Any activity that has the potential of creating dust from walls, floors or ceiling materials.

Upon receiving your notification, a determination will be made whether a licensed and qualified asbestos and lead-based paint abatement contractor should perform the work.

Please provide your project information to the O&M Plan Coordinator and Building management. Please allow _____ business days for the review of your notification and determination if the affected area may have asbestos-containing materials.

Thank you in advance for your cooperation for the successful implementation of this Operation and Maintenance Program. Please return a copy of this letter, with the information requested at the bottom of this page, within 5 business days of the date of this letter. Contact me if you have any questions.

Sincerely,

Building Management/Asbestos Coordinator

Enclosure: ACM-LBP Operations and Maintenance Program

CC:

RECEIPT ACKNOWLEDGED BY (PRINT NAME)_____

SIGNATURE_____ DATE RETURNED_____

TITLE_____ TENENT AGENCY _____

PRIMARY TENENT AGENCY COORDINATOR_____

SECONDARY TENENT AGENCY COORDINATOR_____

LETTER A-2
Outside Contractor Notification Letter

Date: _____

Address: _____

_____

Dear Contractor Representative:

This letter serves as notice that the Operations and Maintenance Program for Asbestos and Lead Paint Management has been updated. Any work, which has the potential to disturb asbestos and/or lead paint, must be performed by the Building's designated licensed abatement contractor.

Although the implementation of an O&M Program is not a regulatory obligation, it is our policy to properly manage asbestos and lead paint in public buildings. A general description of the locations of asbestos and/or lead-based paint containing materials common in building is as follows:

Asbestos	Vinyl Sheet Flooring and associated mastic Floor Tile and associated mastic Plaster Wall Coating
LBP	White paint on wooden doors and door jambs

Note: On all floors where asbestos containing material and suspect ACM is present, all ceiling tiles and all above ceiling materials and surfaces are assumed to be asbestos contaminated. All above ceiling work on unabated floors must be performed by asbestos trained workers utilizing specialized engineering controls and equipment.

The return of one signed copy of this letter constitutes your receipt of the above referenced information, and certification of your compliance with OSHA requirements.

The O&M Program is available for your review. Please contact me if you have any questions.

Sincerely yours,

Building Management/Asbestos Coordinator

RECEIPT ACKNOWLEDGED BY (NAME)_____

SIGNATURE_____ DATE RETURNED_____

TITLE_____

COMPANY_____

LETTER A-3
Administrative Office Employee and Administrative Office Contractor Employee
Notification Letter

Date:_____

To: Administrative Office Employee and/or Administrative Office Contractor Employee

Reference: Operations and Maintenance Program

This memo serves as notification that the Operations and Maintenance Program for Asbestos and Lead Paint has been updated.

The O&M Program requires your full cooperation. The following is a list of prohibited activities:

a. Performing work above dropped ceilings on unabated floors.

b. Entering or penetrating utility shafts.

c. Entering or penetrating interior and perimeter column enclosures.

d. Disturbing floor tiles or floor tile mastics.

If your work will disturb any building materials or if you observe any activities that may appear to disturb asbestos, you must contact me. The O&M Plan is available for your review.

Sincerely yours,

Building Management/Asbestos Coordinator

RECEIPT ACKNOWLEDGED BY (NAME)_____

SIGNATURE_____ DATE RETURNED_____

TITLE_____

COMPANY_____