

**LIMITED NESHAP RENOVATION  
ASBESTOS SURVEY REPORT**

**Bay Pines VA Medical Center  
Building 100 Incinerator Stacks  
10000 Bay Pines Boulevard  
Bay Pines, Florida 33744**

**VRG Project No.: 18950-90072**

**Prepared for:**

**Ms. Claudia Boutot  
Bay Pines VAHCS  
PO Box 5005  
Bay Pines, Florida 33744**

**June 2018**

**Prepared by:**



**4902 113<sup>th</sup> Avenue North  
Clearwater, Florida 33760  
813-999-2009 • Fax 813-849-0330**



June 5, 2018

Ms. Claudia Boutot  
Bay Pines VAHCS  
PO Box 5005  
Bay Pines, FL 33744

**RE: Limited NESHAP Renovation Asbestos Survey Report  
Bay Pines VA Building 100  
Incinerator Stacks  
Bay Pines, Florida**

VRG Project No.: 18950-90072

Dear Ms. Boutot:

VRG Services, LLC (VRG) performed a limited survey for asbestos-containing materials (ACM) on May 29, 2018, at the above referenced facility, located in Bay Pines, Florida. The survey was performed by Mr. Jeffrey Rogers. This report outlines the sampling and testing procedures, and presents the results along with our conclusions and recommendations.

VRG appreciates the opportunity to serve as your consultant on this project. If you should have any questions, or if we can be of further service, please do not hesitate to contact us.

Sincerely,  
**VRG Services, LLC**

Cathy Meilak  
Senior Project Manager

Robert B. Greene, PE, PG, CIH, LEED AP  
Project Principal  
Florida LAC, EA 0000009

CCM/RBG/dd

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## 1.0 INTRODUCTION

### 1.1 INTRODUCTION

The purpose of this limited renovation survey was to identify accessible asbestos-containing materials (ACMs) and their general locations within Building 100 of the Bay Pines VA, located at 10000 Bay Pines Boulevard in Bay Pines, Florida. The survey was limited to the incinerator stack room, where incinerator stacks are scheduled to be removed from the facility.

The survey was conducted pursuant to National Emission Standards for Hazardous Air Pollutants (NESHAP, 40 CFR 61) requirements, associated with the scheduled renovation plans. The survey was performed on May 29, 2018, by Mr. Jeffrey Rogers, an Environmental Protection Agency/Asbestos Hazard Emergency Response Act (EPA/AHERA) accredited inspector. The scope of this survey did not include demolition of any building components, evaluation of architectural plans, quantification of materials for abatement purposes, or removal cost estimating.

### 1.2 FACILITY DESCRIPTION

A summary of the facility investigated is outlined in the table below.

Facility Type:	Hospital
Construction Date:	Circa 1983
Number of Floors:	Five
<b>Structural</b>	
Foundation:	Concrete Slab
Wall Support:	Concrete Block
Exterior Finish:	Not In Scope (NIS)
Roof Support:	Concrete
Roof System Type:	NIS
<b>Mechanical/Plumbing</b>	
HVAC Type:	Cooling Tower/Chiller with Air Handling Units
Duct Type:	Metal and Fiberglass
Pipe Insulation:	None Observed
<b>Interior</b>	
Wall Substrate:	Drywall and Joint Compound
Wall Finishes:	Paint, Vinyl Cove Base, Ceramic Tile
Floor Substrate:	Concrete
Floor Finishes:	Vinyl Floor Tile, Ceramic Tile
Ceiling System:	Drywall and Joint Compound, Suspended Ceiling System
Ceiling Finishes:	Paint, Suspended Ceiling Tiles

## 2.0 RESULTS

### 2.1 ASBESTOS SURVEY PROCEDURES

The limited survey was performed by visually observing accessible areas of the incinerator stack room where stacks are to be removed. An EPA/AHERA accredited inspector performed the visual observations (refer to **Appendix B** for personnel qualifications).

After the overall visual survey was completed, representative sampling areas were determined. The surveyor delineated homogeneous areas of suspect materials and samples of each material were obtained, in general accordance with regulations as established by the Occupational Safety and Health Administration (OSHA) and NESHAP. The field surveyor determined sample locations based on previous experience. Both friable and non-friable materials were sampled. A friable material is one that can be crushed when dry by normal hand pressure. This survey did not include the demolition of building components to access suspect material.

After completion of the fieldwork, the samples were delivered to GLE Associates, Inc., a National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory for analysis. The samples were analyzed by Polarized Light Microscopy (PLM) coupled with dispersion staining, in general accordance with EPA-600/R-93/116. Utilizing this procedure, the various asbestos minerals (chrysotile, amosite, crocidolite, actinolite, tremolite, and anthophyllite) can be determined. The percentages of asbestos minerals in the samples were visually determined by the microscopist. Please note that the EPA designates all materials containing greater than 1% asbestos as an “asbestos-containing material” (ACM).

Regulated Asbestos-Containing Material (RACM) is defined as (a) Friable asbestos materials, (b) Category I non-friable ACM that has become friable, (c) Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.

Category I and Category II non-friable ACM, as defined by the EPA:

- Category I non-friable ACM means asbestos containing packings, gaskets, resilient floor covering, asphalt roofing products, and pliable sealants and mastics that are in good condition and not friable, containing more than 1 percent asbestos, as determined using the method specified in Appendix E, Subpart E, 40 CFR Part 763, Section 1, PLM.
- Category II non-friable ACM means any material, excluding Category I non-friable ACM, containing more than 1 percent asbestos as determined using the methods specified in Appendix E, Subpart E, 40 CFR Part 763 Section 1, PLM that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

## **2.2 IDENTIFIED SUSPECT ASBESTOS-CONTAINING MATERIALS**

A total of eighteen (18) samples of suspect building materials were collected from the facility during the survey, representing six different homogeneous areas. The results of the laboratory analyses are included in **Appendix A**, and approximate sample locations and the approximate extent to which ACM was observed to be present are indicated on the Asbestos Location Plan in **Appendix C**.

A summary of the homogenous sampling areas of suspect ACM determined to be present is outlined in the following table:

**TABLE 2.2-1: SUMMARY OF HOMOGENEOUS SAMPLING AREAS  
BAY PINES VA – BUILDING 100 INCINERATOR ROOM**

HA #	HOMOGENEOUS MATERIAL DESCRIPTION	HOMOGENEOUS MATERIAL LOCATION	FRIABILITY (F /NF)	% ASBESTOS*	# OF SAMPLES COLLECTED	APPROXIMATE QUANTITY	ACM CATEGORY
M-01	Ash	Incinerator Stack	F	ND	3	NIS	NA
TSI-01	Gray Insulation	Boiler Stack (Metal Stack)	NF	ND	3	NIS	NA
TSI-02	White Sheet Insulation	Boiler Stack Access Door	F	ND	3	NIS	NA
<b>TSI-03</b>	<b>White Insulation Wrap</b>	<b>Incinerator Stack (Insulated Portion, Outer Layer)</b>	<b>NF</b>	<b>10% - Mastic ND - Insulation</b>	<b>3</b>	<b>500 SF*</b>	<b>NA</b>
TSI-04	Gray Block Insulation	Incinerator Stack (Insulated Portion, 2 <sup>nd</sup> Layer)	F	ND	3	NIS	NA
TSI-05	White Block Insulation	Incinerator Stack (Insulated Portion, 3 <sup>rd</sup> Layer)	F	ND	3	NIS	NA

\* Amount observed in incinerator stack room. Material may extend beyond stack room, but was inaccessible at the time of survey.

<b>ASBESTOS CONTENT</b> Expressed as percent	* = The facility owner has the option of point-counting by polarized light microscopy (PLM) those RACM whose asbestos content is less than 10% in order to more accurately determine the asbestos content therein.					
	PC = Results based on Point-Count analysis					
<b>FRIABILITY</b>	F = Friable Material	NF = Non-Friable Material				
<b>ACM CATEGORY</b>	RACM = Regulated ACM	CAT I = Category I non-friable ACM		CAT II = Category II non-friable ACM		
<b>ABBREVIATIONS:</b>	NA = Not Applicable	ND = None Detected	NIS = Not in Scope		C = Chrysotile	A = Amosite
	HA = Homogeneous Area	SF = Square Feet		LF = Linear Feet		CF = Cubic Feet

## **3.0 CONCLUSIONS AND RECOMMENDATIONS**

### **3.1 GENERAL**

**Asbestos-containing materials (ACMs) were identified in the scope of this survey. General and specific conclusions and recommendations are provided below.**

The EPA, OSHA and the State of Florida have promulgated regulations dealing with asbestos. For commercial building owners, the EPA NESHAP (40 CFR 61) regulations require removal of RACM, prior to conducting activities which might disturb the material. They also deal with notification, handling and disposal of asbestos.

The EPA recommends that an Operations and Maintenance (O&M) Program be developed for any facilities with ACM, and this Program should address all ACM (known and/or assumed) - present. The O&M Program establishes notification and training requirements along with special procedures for working around the ACM. The O&M Program would remain in effect until all asbestos is removed.

Category I and Category II non-friable materials, as defined by the EPA, may remain within a facility during renovation/demolition with no potential cessation of work, provided they remain undisturbed and/or non-friable. However, there is no guarantee that these materials will remain non-friable. If the materials become friable, then they are classified as RACM.

RACM, as defined by the EPA, must be removed prior to renovation or demolition activities that may disturb the materials.

The OSHA regulations deal with employee exposure to airborne asbestos fibers. The regulations restrict employee exposure, and require special monitoring, training and handling procedures when dealing with asbestos. Additionally, OSHA has regulations that may supersede the EPA regulations. In order to protect the worker, OSHA has established a permissible exposure limit (PEL), which limits employee exposure to airborne fiber concentrations. OSHA requires objective evidence that the PEL will not be exceeded, as justification that personal air monitoring and engineering controls will not be required. OSHA has also established rules requiring the containerization and labeling of asbestos waste.

The State regulations require that anyone involved in asbestos consulting activities be a licensed asbestos consultant and that anyone involved in asbestos abatement, with the exception of roofing materials, be a licensed asbestos abatement contractor.



### **3.2 SPECIFIC**

#### **Mastic Associated with Thermal System Insulation Wrap**

This material is defined by the EPA as a Category I non-friable material. Based upon the observed condition of the material, this material does not appear to present a significant issue at the time of the survey. We recommend that the identified ACM be maintained as part of an O&M Program and periodically monitored for any changes in condition. Additionally, we recommend that a licensed asbestos abatement contractor properly remove and dispose of the ACM prior to conducting renovation activities that might disturb the ACM.

## **4.0 LIMITATIONS AND CONDITIONS**

As a result of previous renovations, there may be hidden materials, such as floor tile, sheet vinyl flooring, insulation, etc. These materials may be found in various areas hidden under existing flooring materials or in wall cavities. Any materials found during construction activities, either not addressed in this survey report, or similar to the ACM identified in this survey report should be assumed to be ACM until sampling and analysis documents otherwise.

Because of the hidden nature of many building components (i.e. within mechanical chases), it may be impossible to determine if all of the suspect building materials have been located and subsequently tested. Destructive testing in some instances is not a viable option. We cannot, therefore, guarantee that all potential ACM has been located. For the same reasons, estimates of quantities and/or conditions are subject to readily apparent situations, and our findings reflect this condition. We do warrant, however, that the investigations and methodology reflect our best efforts based upon the prevailing standard of care in the environmental industry.

The Florida Department of Environmental Protection (FDEP) has issued an interpretation regarding the testing of concrete flooring, walls and roofing materials, which states that “if concrete will be recycled or reused, the concrete must be sampled and analyzed for the presence of asbestos prior to the commencement of activities that may release asbestos fibers into the environment”, and that “all of the different layers or types of concrete in a sample must be analyzed, individually, using the method specified in Appendix E, subpart E, 40 CFR Part 763, Section 1, Polarized Light Microscopy, with point-counting”, as applicable. Under the presumption that the Client will not be reusing/recycling the concrete, this additional sampling and analysis of concrete is not included with our scope of work. However, if requested by the Client, VRG will perform this work as an additional service.

The information contained in this report was prepared based upon specific parameters and regulations in force at the time of this report. The information herein is only for the specific use of the client and VRG. VRG accepts no responsibility for the use, interpretation, or reliance by other parties on the information contained herein, unless prior written authorization has been obtained from VRG.

**APPENDIX A**  
**Analytical Results and Chain of Custody**

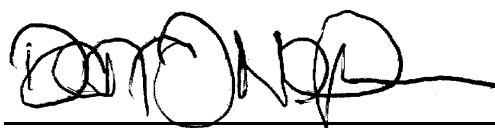
# SUMMARY OF BULK SAMPLE ANALYSIS

## Bay Pines VA; Incinerator Stack - Building 100

18950-90072

Sample	Sample Type		Fiber Type
M-01A	Ash	100%	Quartz, Calcite, Clay, Mica
M-01B	Ash	100%	Quartz, Calcite, Clay, Mica
M-01C-QC	Ash	100%	Quartz, Calcite, Clay, Mica
TSI-01A	Gray Insulation	100%	Quartz, Calcite, Clay, Mica
TSI-01B	Gray Insulation	100%	Quartz, Calcite, Clay, Mica
TSI-01C	Gray Insulation	100%	Quartz, Calcite, Clay, Mica
TSI-02A	White Sheet Insulation	100%	Cellulose/paper
TSI-02B	White Sheet Insulation	100%	Cellulose/paper
TSI-02C	White Sheet Insulation	100%	Cellulose/paper
TSI-03A	White Mastic	10% 90%	Chrysotile Asbestos Polymer
	Beige Insulation	100%	Quartz, Calcite, Clay, Mica
TSI-03B	White Mastic		Positive Stop/Sample not analyzed
	Beige Insulation	100%	Quartz, Calcite, Clay, Mica
TSI-03C	White Mastic		Positive Stop/Sample not analyzed
	Beige Insulation	100%	Quartz, Calcite, Clay, Mica
TSI-04A-QC	Gray Block Insulation	100%	Quartz, Calcite, Clay, Mica

Analyst / Approved  
Signatory:



Darryl Neldner

\* Polarized Light Microscopy coupled with dispersion is the technique used for identification in accordance with EPA 600/M4-82-020, EPA 600/R-93/116, and NIOSH Method 9002.

\*\* The percentage of each component is visually estimated. The result of this analysis relate only to the material tested. The report shall not be used to claim product endorsement by NVLAP or any agency of the U.S. Government. (>1% greater than one percent, <1% less than one percent) QC - Sample reanalyzed for QA/QC.

\*\*\* This report shall not be reproduced except in full, without the written approval of the laboratory. GLE Report # 22675

Analysis performed by GLE Associates, Inc. NVLAP Code 102003-0, CO AL-17485, TX 30-0337

Feedback regarding laboratory performance should be addressed to lab@gleassociates.com.

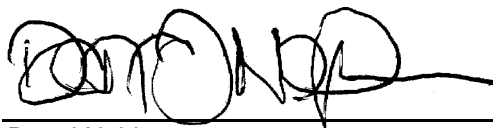
Report Date: 5/29/2018

Page 1 of 2

**SUMMARY OF BULK SAMPLE ANALYSIS**  
**Bay Pines VA; Incinerator Stack - Building 100**  
18950-90072

Sample	Sample Type		Fiber Type
TSI-04B	Gray Block Insulation	100%	Quartz, Calcite, Clay, Mica
TSI-04C	Gray Block Insulation	100%	Quartz, Calcite, Clay, Mica
TSI-05A	White Block Insulation	100%	Quartz, Calcite, Clay, Mica
TSI-05B	White Block Insulation	100%	Quartz, Calcite, Clay, Mica
TSI-05C	White Block Insulation	100%	Quartz, Calcite, Clay, Mica

Analyst / Approved  
Signatory:



Darryl Neldner

\* Polarized Light Microscopy coupled with dispersion is the technique used for identification in accordance with EPA 600/M4-82-020, EPA 600/R-93/116, and NIOSH Method 9002.

\*\* The percentage of each component is visually estimated. The result of this analysis relate only to the material tested.  
The report shall not be used to claim product endorsement by NVLAP or any agency of the U.S. Government.  
(>1% greater than one percent, <1% less than one percent) QC - Sample reanalyzed for QA/QC.

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Analysis performed by GLE Associates, Inc. NVLAP Code 102003-0, CO AL-17485, TX 30-0337

Feedback regarding laboratory performance should be addressed to lab@gleassociates.com.

Report Date: 5/29/2018

Page 2 of 2

## CHAIN OF CUSTODY/SAMPLE TRANSMITTAL FORM



GLE Associates, Inc.  
5405 Cypress Center Drive, Suite 110  
Tampa, FL 33609  
Tel. (813) 241-8350 FAX (813) 241-8737

CLIENT: VRG / Bay Pres VAMC 22075  
PROJECT #: 18950-90072  
PROJECT: Incenerator Stack 8/19/00  
LABORATORY SENT TO: GLE - Tampa  
DATE: 5/29/2018

## SAMPLE INFORMATION

SAMPLE #	DESCRIPTION	SAMPLE #	DESCRIPTION
M-01A-C	Ash		
TSI-01A-C	Gray Insulation (inside metal stack)		
TSI-02A-C	White sheet insulation		
TSI-03A-C	White insulation wrap		
TSI-04A-C	Gray Block insulation		
TSI-05A-C	White Block insulation		

**IMPORTANT: TOTAL NUMBER OF SAMPLES SUBMITTED**

18 eighteen

**IMPORTANT: POSITIVE STOP ANALYSIS**

Yes

**IMPORTANT: E-MAIL RESULTS TO**

Jeff Rogers / Cathy Medek

## NOTE:

Turnaround time starts at receipt by lab and does not include weekend or holidays.

## Select Turnaround Time

☒ 3 hour ☐ 6 Hour ☐ 24 Hour ☐ 48 Hour ☐ 3 Day ☐ 4 Day

## REPORT RESULTS TO THE ADDRESS ABOVE

CHAIN OF CUSTODY: GLE ASSOCIATES, INC.		CHAIN OF CUSTODY: LABORATORY	
PACKAGED BY: Jeffrey Rogers		SAMPLES RECEIVED BY: 5/29/18	
DATE PACKAGED: 5/29/2018		DATE: 5/29/18	
METHOD OF TRANSMITTAL: Hand Deliver		TIME: 4:00	
TRANSMITTED BY: Jeffrey Rogers		CONDITION OF PACKAGED SAMPLES:	
CHAIN OF CUSTODY: RETURNED TO GLE ASSOCIATES, INC.			
RECEIVED BY:		DATE:	
INVENTORIED BY:		DATE:	
REPACKAGED AND SEALED BY:		DATE:	

PAGE: 1 OF 1

**APPENDIX B**  
**Personnel and Laboratory Certifications**



**STATE OF FLORIDA  
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION**

**ASBESTOS LICENSING UNIT  
2601 BLAIR STONE ROAD  
TALLAHASSEE FL 32399-0783**

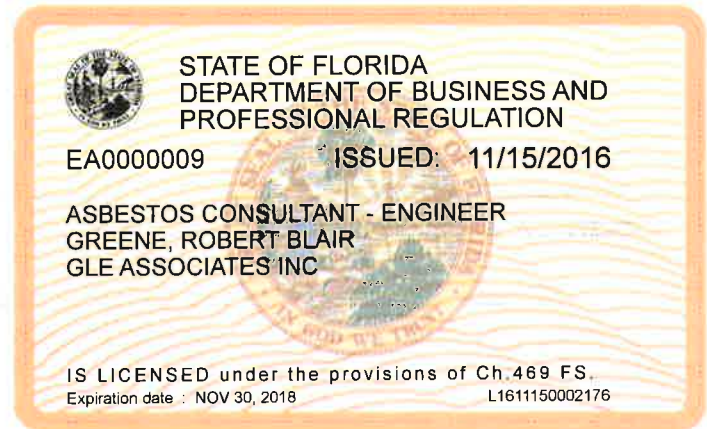
**(850) 487-1395**

**GREENE, ROBERT BLAIR  
GLE ASSOCIATES INC  
5405 CYPRESS CENTER DR  
SUITE 110  
TAMPA FL 33609**

Congratulations! With this license you become one of the nearly one million Floridians licensed by the Department of Business and Professional Regulation. Our professionals and businesses range from architects to yacht brokers, from boxers to barbeque restaurants, and they keep Florida's economy strong.

Every day we work to improve the way we do business in order to serve you better. For information about our services, please log onto [www.myfloridalicense.com](http://www.myfloridalicense.com). There you can find more information about our divisions and the regulations that impact you, subscribe to department newsletters and learn more about the Department's initiatives.

Our mission at the Department is: License Efficiently, Regulate Fairly. We constantly strive to serve you better so that you can serve your customers. Thank you for doing business in Florida, and congratulations on your new license!



DETACH HERE

RICK SCOTT, GOVERNOR

KEN LAWSON, SECRETARY

**STATE OF FLORIDA  
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION  
ASBESTOS LICENSING UNIT**

**LICENSE NUMBER**

EA0000009

The ASBESTOS CONSULTANT - ENGINEER  
Named below IS LICENSED  
Under the provisions of Chapter 469 FS.  
Expiration date: NOV 30, 2018

**GREENE, ROBERT BLAIR  
GLE ASSOCIATES INC  
5405 CYPRESS CENTER DR  
SUITE 110  
TAMPA FL 33609**



ISSUED: 11/15/2016

DISPLAY AS REQUIRED BY LAW

SEQ # L1611150002176





RICK SCOTT, GOVERNOR

JONATHAN ZACHEM, SECRETARY



**STATE OF FLORIDA**  
**DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION**  
**ASBESTOS LICENSING UNIT**

THE ASBESTOS BUSINESS ORGANIZATION HEREIN IS LICENSED UNDER THE  
PROVISIONS OF CHAPTER 469, FLORIDA STATUTES

**VRG SERVICES LLC**

ROBERT BLAIR GREENE  
4902 113TH AVENUE NORTH  
CLEARWATER FL 33609

**LICENSE NUMBER: ZA476**

**EXPIRATION DATE: NOVEMBER 30, 2019**

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**GLE Associates, Inc. FL 49-0001218**

5405 Cypress Center Drive ~ Suite 110 ~ Tampa, Florida 33609 ~ (813) 241-8350

certifies that

**Jeffrey Rogers**

has completed the requisite training for  
**ASBESTOS INSPECTOR REFRESHER**

accreditation under TSCA Title II Course No.: FL 49-0002824

conducted on

**August 26, 2017**

at

**TAMPA, FLORIDA**

Certificate Number

**6297**

Passed Exam with score of 70% or better.

EPA Accreditation Expires: August 26, 2018

Instructor

GLE Associates, Inc.

Robert B. Greene

United States Department of Commerce  
National Institute of Standards and Technology



---

**Certificate of Accreditation to ISO/IEC 17025:2005**

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NVLAP LAB CODE: 102003-0

**GLE Associates, Inc.**  
Tampa, FL

*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,  
listed on the Scope of Accreditation, for:*


**Asbestos Fiber Analysis**

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005.  
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality  
management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).*

---

2018-04-01 through 2019-03-31

*Effective Dates*



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*For the National Voluntary Laboratory Accreditation Program*

**SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005**

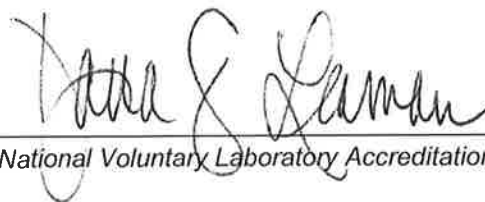
**GLE Associates, Inc.**  
5405 Cypress Center Drive  
Suite 110  
Tampa, FL 33609  
Mr. Darryl S. Neldner  
Phone: 813-241-8350 x247 Fax: 813-241-8737  
Email: [dneldner@gleassociates.com](mailto:dneldner@gleassociates.com)  
<http://www.gleassociates.com>

**ASBESTOS FIBER ANALYSIS**

**NVLAP LAB CODE 102003-0**

**Bulk Asbestos Analysis**

<u><b>Code</b></u>	<u><b>Description</b></u>
18/A01	EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples
18/A03	EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials



*For the National Voluntary Laboratory Accreditation Program*