SECTION 02 82 16.00 20 ENGINEERING CONTROL OF ASBESTOS CONTAINING MATERIALS

PART 1 GENERAL

1.1 REFERENCES:

The publications listed below form a part of this specification to the extent referenced. The publications are referred to within the text by the basic designation only.

AMERICAN INDUSTRIAL HYGIENE ASSOCIATION (AIHA)

AIHA Z88.6	(2006) Respiratory Protection - Respirator Use-Physical Qualifications for Personnel
AIHA Z9.2	(2006) Fundamentals Governing the Design and Operation of Local Exhaust Ventilation Systems

ASTM INTERNATIONAL (ASTM)

- ASTM C 732 (2006) Aging Effects of Artificial Weathering on Latex Sealants
- ASTM D 2794 (1993; R 2010) Resistance of Organic Coatings to the Effects of Rapid Deformation (Impact)
- ASTM D 522 (1993a; R 2008) Mandrel Bend Test of Attached Organic Coatings
- ASTM E 119 (2011) Standard Test Methods for Fire Tests of Building Construction and Materials
- ASTM E 1368 (2005el) Visual Inspection of Asbestos Abatement Projects
- ASTM E 736 (2000; R 2006) Cohesion/Adhesion of Sprayed Fire-Resistive Materials Applied to Structural Members
- ASTM E 84 (2010b) Standard Test Method for Surface Burning Characteristics of Building Materials

ASTM E 96/E 96M (2010) Standard Test Methods for Water Vapor Transmission of Materials

U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)

EPA 560/5-85-024 (1985) Guidance for Controlling Asbestos-Containing Materials in Buildings (Purple Book)

U.S. NATIONAL ARCHIVES AND RECORDS ADMINISTRATION (NARA)

WATER LINE REPLACEMENT PROJECT 590-C20-240 DEPARTMENT OF VETERANS AFFAIRS HAMPTON, VA 29 CFR 1926.103 Respiratory Protection 29 CFR 1926.1101 Asbestos 29 CFR 1926.200 Accident Prevention Signs and Tags 29 CFR 1926.51 Sanitation 29 CFR 1926.59 Hazard Communication General Provisions 40 CFR 61-SUBPART A 40 CFR 61-SUBPART M National Emission Standard for Asbestos 40 CFR 763 Asbestos

UNDERWRITERS LABORATORIES (UL)

UL 586

(2009) Standard for High-Efficiency Particulate, Air Filter Units

1.2 DEFINITIONS:

- 1.2.1 ACM
 - A. Asbestos Containing Materials.
- 1.2.2 Amended Water
 - A. Water containing a wetting agent or surfactant with a maximum surface tension of 0.00042 psi.
- 1.2.3 Area Sampling
 - A. Sampling of asbestos fiber concentrations which approximates the concentrations of asbestos in the theoretical breathing zone but is not actually collected in the breathing zone of an employee.
- 1.2.4 Asbestos
 - A. The term asbestos includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, and actinolite asbestos and any of these minerals that has been chemically treated or altered. Materials are considered to contain asbestos if the asbestos content of the material is determined to be at least one percent.
- 1.2.5 Asbestos Control Area
 - A. That area where asbestos removal operations are performed which is isolated by physical boundaries which assist in the prevention of the uncontrolled release of asbestos dust, fibers, or debris.

1.2.6 Asbestos Fibers

- A. Those fibers having an aspect ratio of at least 3:1 and longer than 5 micrometers as determined by National Institute for Occupational Safety and Health (NIOSH) Method 7400.
- 1.2.7 Asbestos Permissible Exposure Limit
 - A. Fibers per cubic centimeter of air as an 8-hour time weighted average measured in the breathing zone as defined by 29 CFR 1926.1101 or other Federal legislation having legal jurisdiction for the protection of workers health.
- 1.2.8 Background
 - A. The ambient airborne asbestos concentration in an uncontaminated area as measured prior to any asbestos hazard abatement efforts. Background concentrations for other (contaminated) areas are measured in similar but asbestos free locations.
- 1.2.9 Contractor
 - A. The Contractor is that individual, or entity under contract to the Navy to perform the herein listed work.
- 1.2.10 Class I Asbestos Work
 - A. Activities defined by OSHA involving the removal of thermal system insulation (TSI) and surfacing ACM.
- 1.2.11 Class II Asbestos Work
 - A. Activities defined by OSHA involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos - containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastic. Certain "incidental" roofing materials such as mastic, flashing and cements when they are still intact are excluded from Class II asbestos work. Removal of small amounts of these materials which would fit into a glovebag may be classified as a Class III job.
- 1.2.12 Competent Person
 - A. A person meeting the requirements for competent person as specified in 29 CFR 1926.1101 including a person capable of identifying existing asbestos hazards in the workplace and selecting the appropriate control strategy for asbestos exposure, who has the authority to take prompt corrective measures to eliminate them, and is specifically trained in a training course which meet the criteria of EPA's Model

Accreditation Plan (40 CFR 763) for project designer or supervisor, or its equivalent. The competent person shall have a current Commonwealth of Virginia asbestos contractors or supervisors license.

1.2.13 Critical Barrier

- A. One or more layers of plastic sealed over all openings into a regulated area or any other similarly placed physical barrier sufficient to prevent airborne asbestos in a regulated area from migrating to an adjacent area.
- 1.2.14 Decontamination Area
 - A. An enclosed area adjacent and connected to the regulated area and consisting of an equipment room, shower area, and clean room, which is used for the decontamination of workers, materials, and equipment that are contaminated with asbestos.
- 1.2.15 Disposal Bag
 - A. A 6 mil thick, leak-tight plastic bag, pre-labeled in accordance with 29 CFR 1926.1101, used for transporting asbestos waste from containment to disposal site.

1.2.16 Disturbance

- A. Activities that disrupt the matrix of ACM, crumble or pulverize ACM, or generate visible debris from ACM. Disturbance includes cutting away small amounts of ACM, no greater than the amount which can be contained in 1 standard sized glovebag or waste bag, not larger than 60 inches in length and width in order to access a building component.
- 1.2.17 Encapsulation
 - A. The abatement of an asbestos hazard through the appropriate use of chemical encapsulants.
- 1.2.18 Encapsulants
 - Specific materials in various forms used to chemically or physically entrap asbestos fibers in various configurations to prevent these fibers from becoming airborne. There are four types of encapsulants as follows which must comply with performance requirements as specified herein.
 - a. Removal Encapsulant (can be used as a wetting agent)
 - Bridging Encapsulant (used to provide a tough, durable surface coating to asbestos containing material)

- c. Penetrating Encapsulant (used to penetrate the asbestos containing material encapsulating all asbestos fibers and preventing fiber release due to routine mechanical damage)
- d. Lock-Down Encapsulant (used to seal off or "lock-down" minute asbestos fibers left on surfaces from which asbestos containing material has been removed).
- 1.2.19 Equipment Room or Area
 - A. An area adjacent to the regulated area used for the decontamination of employees and their equipment.
- 1.2.20 Friable Asbestos Material
 - A. One percent asbestos containing material that can be crumbled, pulverized, or reduced to powder by hand pressure when dry.
- 1.2.21 Glovebag Technique
 - A. Those asbestos removal and control techniques put forth in 29 CFR 1926.1101 Appendix G.
- 1.2.22 HEPA Filter Equipment
 - A. High efficiency particulate air (HEPA) filtered vacuum and/or exhaust ventilation equipment with a filter system capable of collecting and retaining asbestos fibers. Filters shall retain 99.97 percent of particles 0.3 microns or larger as indicated in UL 586.
- 1.2.23 Negative Pressure Enclosure (NPE)
 - A. That engineering control technique described as a negative pressure enclosure in 29 CFR 1926.1101.
- 1.2.24 Nonfriable Asbestos Material
 - A. Material that contains asbestos in which the fibers have been immobilized by a bonding agent, coating, binder, or other material so that the asbestos is well bound and will not normally release asbestos fibers during any appropriate use, handling, storage or transportation. It is understood that asbestos fibers may be released under other conditions such as demolition, removal, or mishap.
- 1.2.25 Permissible Exposure Limits (PELs)
- 1.2.25.1 PEL-Time Weighted Average(TWA)
 - A. Concentration of asbestos not in excess of 0.1 fibers per cubic centimeter of air (f/cc) as an 8 hour time weighted average (TWA).
- 1.2.25.2 PEL-Excursion Limit

- A. An airborne concentration of asbestos not in excess of 1.0 f/cc of air as averaged over a sampling period of 30 minutes.
- 1.2.26 Personal Sampling
 - A. Air sampling which is performed to determine asbestos fiber concentrations within the breathing zone of a specific employee, as performed in accordance with 29 CFR 1926.1101.
- 1.2.27 Private Qualified Person (PQP)
 - A. That qualified person hired by the Contractor to perform the herein listed tasks.
- 1.2.28 Qualified Person (QP)
 - A. A Registered Architect, Professional Engineer, Certified Industrial Hygienist, consultant or other qualified person who has successfully completed training and is therefore accredited under a legitimate State Model Accreditation Plan as described in 40 CFR 763 as a Building Inspector, Contractor/Supervisor Abatement Worker, and Asbestos Project Designer; and has successfully completed the National Institute of Occupational Safety and Health (NIOSH) 582 course "Sampling and Evaluating Airborne Asbestos Dust" or equivalent. The QP must be qualified to perform visual inspections as indicated in ASTM E 1368. The QP shall be appropriately licensed in the Commonwealth of Virginia.
- 1.2.29 Regulated Area
 - A. An OSHA term defined in 29 CFR 1926.1101 meaning an area established by the Contractor to demarcate areas where Class I, II, and III asbestos work is conducted; also any adjoining area where debris and waste from such asbestos work accumulate; and an area within which airborne concentrations of asbestos exceed, or there is a reasonable possibility they may exceed, the permissible exposure limit.
- 1.2.30 TEM
 - A. Refers to Transmission Electron Microscopy.
- 1.2.31 Thermal System Insulation (TSI) ACM
 - A. ACM which contains more than 1% asbestos and is applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior structural components to prevent heat loss or gain or water condensation.

- 1.2.32 Time Weighted Average (TWA)
 - A. The TWA is an 8-hour time weighted average airborne concentration of asbestos fibers.
- 1.2.33 VA Medical Center Consultant (VAMC)
 - A. That qualified person employed directly by the Government to monitor, sample, inspect the work or in some other way advise the COR. The VAMC is normally a private consultant, but can be an employee of the Government.
- 1.2.34 Wetting Agent
 - A. A chemical added to water to reduce the water's surface tension thereby increasing the water's ability to soak into the material to which it is applied. An equivalent wetting agent must have a surface tension of at most 0.00042 psi.
- 1.2.35 Worker
 - A. Individual (not designated as the Competent Person or a supervisor) who performs asbestos work and has completed asbestos worker training required by 29 CFR 1926.1101, to include EPA Model Accreditation Plan (MAP) "Worker" training; accreditation if required by the OSHA Class of work to be performed or by the state where the work is to be performed.

1.3 REQUIREMENTS:

1.3.1 Description of Work

The work covered by this section includes the handling and control of asbestos containing materials and describes some of the resultant procedures and equipment required to protect workers, the environment and occupants of the building or area, or both, from contact with airborne asbestos fibers. The work also includes the disposal of any asbestos containing materials generated by the work. More specific operational procedures shall be outlined in the Asbestos Hazard Abatement Plan called for elsewhere in this specification. The asbestos work includes the demolition, removal and cleaning of asbestos-containing materials located in the basements of Buildings #50, #52 and #71 at the VA Medical Center in Hampton, VA which is governed by 40 CFR 763. All asbestos abatement work shall be performed in accordance with 29 CFR 1926.1101. Refer to mechanical demolition drawings for work locations. Under normal conditions non-friable or chemically bound materials containing asbestos would not be considered hazardous; however,

this material may release airborne asbestos fibers during demolition and removal and therefore must be handled in accordance with the removal and disposal procedures as specified herein. Provide negative pressure enclosure and/ or glovebag techniques as outlined in this specification when removing friable asbestos-containing materials. The VA Medical Center will evacuate the work area during the asbestos abatement work. All asbestos removal work shall be supervised by a competent person as specified herein.

1.3.2 Sequence of Work

The general sequence of work shall be as follows:

A. Identify boundaries of the regulated work area based on the project drawings.

B. Establish a negative pressure enclosure as required to clean and abate the work area to accomplish the work.

C. Clean and abate the work are using wet methods and HEPA vacuum as necessary. Leave all critical barriers in place to allow the plumbing work to be performed in a clean area.

D. Monitor the critical barriers to ensure they remain intact during the work. Remove the critical barriers at the completion of the project.

E. Post warning signs on the doors leading to the work areas that indicate the areas contain asbestos and should not be entered by personnel who are not trained regarding the hazards posed by asbestos.

1.3.3 Medical Requirements

- A. Provide medical requirements including but not limited to medical surveillance and medical record keeping as listed in 29 CFR 1926.1101.
- 1.3.3.1 Medical Examinations
 - A. Before exposure to airborne asbestos fibers, provide workers with a comprehensive medical examination as required by 29 CFR 1926.1101 or other pertinent State or local directives. This requirement must have been satisfied within the 12 months prior to the start of work on this contract. The same medical examination shall be given on an annual basis to employees engaged in an occupation involving asbestos and within 30 calendar days before or after the termination of employment in such occupation. Specifically identify x-ray films of asbestos workers to the consulting radiologist and mark medical record jackets with the word "ASBESTOS."

1.3.3.2 Medical Records

A. Maintain complete and accurate records of employees' medical examinations, medical records, and exposure data for a period of indefinite time after termination of employment and make records of the required medical examinations and exposure data available for inspection and copying to: The Assistant Secretary of Labor for Occupational Safety and Health (OSHA), or authorized representatives of them, and an employee's physician upon the request of the employee or former employee.

1.3.4 Employee Training

A. Submit certificates, prior to the start of work but after the main abatement submittal, signed by each employee indicating that the employee has received training in the proper handling of materials and wastes that contain asbestos in accordance with 40 CFR 763; understands the health implications and risks involved, including the illnesses possible from exposure to airborne asbestos fibers; understands the use and limits of the respiratory equipment to be used; and understands the results of monitoring of airborne quantities of asbestos as related to health and respiratory equipment as indicated in 29 CFR 1926.1101 on an initial and annual basis. Certificates shall be organized by individual worker, not grouped by type of certification. Post appropriate evidence of compliance with the training requirements of 40 CFR 763. Train all personnel involved in the asbestos control work in accordance with United States Environmental Protection Agency (USEPA) Asbestos Hazard Emergency Response Act (AHERA) training criteria or State training criteria whichever is more stringent. The Contractor shall document the training by providing: dates of training, training entity, course outline, names of instructors, and qualifications of instructors upon request by the COR. Furnish each employee with respirator training and fit testing administered by the PQP as required by 29 CFR 1926.1101. Fully cover engineering and other hazard control techniques and procedures. All asbestos workers shall have a current Commonwealth of Virginia asbestos worker's license.

1.3.5 Permits, Licenses, and Notifications

A. Obtain necessary permits and licenses in conjunction with asbestos removal, encapsulation, hauling, and disposition, and furnish

notification of such actions required by Federal, State, regional, and local authorities prior to the start of work. Notify the Regional Office of the United States Environmental Protection Agency (USEPA), State's environmental protection agency and the COR in writing 20 working days prior to commencement of work in accordance with 40 CFR 61-SUBPART M16 VAC 25-20-30. Notify the COR and other appropriate Government agencies in writing 20 working days prior to the start of asbestos work as indicated in applicable laws, ordinances, criteria, rules, and regulations. Submit copies of all Notifications to the COR.

- 1.3.6 Environment, Safety and Health Compliance
 - 1. In addition to detailed requirements of this specification, comply with those applicable laws, ordinances, criteria, rules, and regulations of Federal, State, regional, and local authorities regarding handling, storing, transporting, and disposing of asbestos waste materials. Comply with the applicable requirements of the current issue of 29 CFR 1926.1101, 40 CFR 61-SUBPART A, 40 CFR 61-SUBPART M, and submit matters of interpretation of standards to the appropriate administrative agency for resolution before starting the work. Where the requirements of this specification, applicable laws, rules, criteria, ordinances, regulations, and referenced documents vary, the most stringent requirement as defined by the Government shall apply. The following laws, ordinances, criteria, rules and regulations regarding removal, handling, storing, transporting and disposing of asbestos materials apply:

a. 18 VAC 15-20 Virginia Asbestos Licensing Regulations

- b. 9 VAC 20-60 Virginia Hazardous Waste Regulations
- c. 9 VAC 20-81 Virginia Solid Waste Management Regulations.

1.3.7 Respiratory Protection Program

- A. Establish and implement a respirator program as required by AIHA Z88.6, 29 CFR 1926.1101, and 29 CFR 1926.103. Submit a written description of the program to the COR. Submit a written program manual or operating procedure including methods of compliance with regulatory statutes.
- 1.3.7.1 Respirator Program Records

- A. Submit records of the respirator program as required by AIHA Z88.6, 29 CFR 1926.103, and 29 CFR 1926.1101.
- 1.3.8 Asbestos Hazard Control Supervisor
 - A. The Contractor shall be represented on site by a supervisor, trained using the model Contractor accreditation plan as indicated in the Federal statutes for all portions of the herein listed work.
- 1.3.9 Hazard Communication
 - A. Adhere to all parts of 29 CFR 1926.59 and provide the COR with a copy of the Material Safety Data Sheets (MSDS) for all materials brought to the site.
- 1.3.10 Asbestos Hazard Abatement Plan
 - A. Submit a detailed plan of the safety precautions such as lockout, tagout, tryout, fall protection, and confined space entry procedures and equipment and work procedures to be used in the removal of materials containing asbestos. The plan, not to be combined with other hazard abatement plans, shall be prepared, signed, and sealed by the PQP. Provide a Table of Contents for each abatement submittal, which shall follow the sequence of requirements in the contract. Such plan shall include but not be limited to the precise personal protective equipment to be used including, but not limited to, respiratory protection, type of whole-body protection , the location of asbestos control areas including clean and dirty areas, buffer zones, showers, storage areas, change rooms, removal method, interface of trades involved in the construction, sequencing of asbestos related work, disposal plan, type of wetting agent and asbestos sealer to be used, locations of local exhaust equipment, planned air monitoring strategies, and a detailed description of the method to be employed in order to control environmental pollution. The plan shall also include (both fire and medical emergency) response plans. The Asbestos Hazard Abatement Plan must be approved in writing prior to starting any asbestos work. The Contractor, Asbestos Hazard Control Supervisor, and PQP shall meet with the COR prior to beginning work, to discuss in detail the Asbestos Hazard Abatement Plan, including work procedures and safety precautions. Once approved by the COR, the plan will be enforced as if an addition to the specification. Any changes required in the specification as a result of the plan shall be identified

specifically in the plan to allow for free discussion and approval by the COR prior to starting work.

- 1.3.11 Testing Laboratory
 - A. Submit the name, address, and telephone number of each testing laboratory selected for the sampling, analysis, and reporting of airborne concentrations of asbestos fibers along with evidence that each laboratory selected holds the appropriate State license and/or permits and certification that each laboratory is American Industrial Hygiene Association (AIHA) accredited and that persons counting the samples have been judged proficient by current inclusion on the AIHA Asbestos Analysis Registry (AAR) and successful participation of the laboratory in the Proficiency Analytical Testing (PAT) Program. Where analysis to determine asbestos content in bulk materials or transmission electron microscopy is required, submit evidence that the laboratory is accredited by the National Institute of Science and Technology (NIST) under National Voluntary Laboratory Accreditation Program (NVLAP) for asbestos analysis. The testing laboratory firm shall be independent of the asbestos contractor and shall have no employee or employer relationship which could constitute a conflict of interest.

1.3.12 Landfill Approval

A. Submit written evidence that the landfill is for asbestos disposal by the U.S. Environmental Protection Agency, Region 4, Air Enforcement Section, and local regulatory agencies. Within 3 working days after delivery, submit detailed delivery tickets, prepared, signed, and dated by an agent of the landfill, certifying the amount of asbestos materials delivered to the landfill. Submit a copy of the waste shipment records within 1 day of the shipment leaving the project site.

1.3.13 Medical Certification

A. Provide a written certification for each worker and supervisor, signed by a licensed physician indicating that the worker and supervisor has met or exceeded all of the medical prerequisites listed herein and in 29 CFR 1926.1101 and 29 CFR 1926.103 as prescribed by law. Submit certificates prior to the start of work but after the main abatement submittal.

1.4 SUBMITTALS:

Submit in accordance with Section 01 33 23, SHOP DRAWINGS, PRODUCT DATA, AND SAMPLES, the following:

- A. Product Data:
 - 1. Local exhaust equipment
 - 2. Vacuums
 - 3. Respirators
 - 4. Pressure differential automatic recording instrument
 - 5. Amended water
 - 6. Glovebags:

Material Safety Data Sheets (MSDS) for all materials proposed for transport to the project site.

- 7. Encapsulants
- B. Test Reports:
 - 1. Air sampling results
 - 2. Pressure differential recordings for local exhaust system
 - 3. Asbestos disposal quantity report
 - 4. Clearance sampling

C. Certificates:

- 1. Asbestos hazard abatement plan
- 2. Testing laboratory
- 3. Private qualified person documentation
- 4. Contractor's license
- 5. Competent person documentation
- 6. Worker's license
- 7. Landfill approval
- 8. Employee training
- 9. Medical certification requirements
- 10. Waste shipment records and if applicable exemption report
- 11. Respiratory Protection Program
- 12. Delivery tickets
- 13. Vacuums
- 14. Water filtration equipment
- 15. Ventilation systems
- 16. Other equipment used to contain airborne asbestos fibers
- 17. Chemical encapsulants sealers
- 18. Notifications:

Show compliance with AIHA Z9.2 by providing manufacturers' certifications.

- D. Closeout Submittals
 - 1. Notifications
 - 2. Rental equipment
 - 3. Respirator program records
 - 4. Permits and licenses

1.5 QUALITY ASSURANCE:

- 1.5.1 Private Qualified Person Documentation
 - A. Submit the name, address, and telephone number of the Private Qualified Person (PQP) selected to prepare the Asbestos Hazard Abatement Plan, direct monitoring and training, and documented evidence that the PQP has successfully completed training in and is accredited and where required is certified as, a Building Inspector, Contractor/Supervisor Abatement Worker, and Asbestos Project Designer as described by 40 CFR 763 and has successfully completed the National Institute of Occupational Safety and Health (NIOSH) 582 course "Sampling and Evaluating Airborne Asbestos Dust" or equivalent. The PQP shall be appropriately licensed in the Commonwealth of Virginia as a Project Monitor. The PQP and the asbestos contractor shall not have an employee/employer relationship or financial relationship which could constitute a conflict of interest. The PQP shall be a first tier subcontractor.
- 1.5.2 Competent Person Documentation
 - A. Submit training certification and a current Commonwealth of Virginia Asbestos Contractor's and Supervisor's License.
- 1.5.3 Worker's License
 - A. Submit documentation that requires all workers have a current Commonwealth of Virginia Asbestos Workers License.
- 1.5.4 Contractor's License
 - A. Contractor shall have current asbestos contractor's license. Submit a copy of the asbestos contractor's license issued by the Commonwealth of Virginia.
- 1.5.5 Air Sampling Results
 - A. Complete fiber counting and provide results to the PQP for review within 16 hours of the "time off" of the sample pump. Notify the COR

immediately of any airborne levels of asbestos fibers in excess of the acceptable limits. Submit sampling results to the COR and the affected Contractor employees where required by law within 3 working days, signed by the testing laboratory employee performing air sampling, the employee that analyzed the sample, and the PQP. Notify the Contractor and the COR immediately of any variance in the pressure differential which could cause adjacent unsealed areas to have asbestos fiber concentrations in excess of 0.01 fibers per cubic centimeter or background whichever is higher. In no circumstance shall levels exceed 0.1 fibers per cubic centimeter.

- 1.5.6 Pressure Differential Recordings for Local Exhaust System
 - A. Provide a local exhaust system that creates a negative pressure of at least 0.02 inches of water relative to the pressure external to the enclosure and operate it continuously, 24 hours a day, until the temporary enclosure of the asbestos control area is removed. Submit pressure differential recordings for each work day to the PQP for review and to the COR within 24 hours from the end of each work day.

1.6 EQUIPMENT:

1.6.1 Rental Equipment

A. Provide a copy of the written notification to the rental company concerning the intended use of the equipment and the possibility of asbestos contamination of the equipment.

PART 2 - PRODUCTS

- 2.1 ENCAPSULANTS
 - A. Shall conform to current USEPA requirements, shall contain no toxic or hazardous substances as defined in 29 CFR 1926.59, and shall conform to the following performance requirements.
- 2.1.1 Removal Encapsulants

Requirement	Test Standard
Flame Spread - 25, Smoke Emission - 50	ASTM E 84
Life Expectancy - 20 years	ASTM C 732 Accelerated Aging Test
Permeability - Minimum 0.4 perms	ASTM E 96/E 96M

PROJECT 590-C20-240 WATER LINE REPLACEMENT DEPARTMENT OF VETERANS AFFAIRS HAMPTON, VA 2.1.2 Bridging Encapsulant Requirement Test Standard Flame Spread - 25, Smoke Emission - 50 ASTM E 84 Life Expectancy - 20 years ASTM C 732 Accelerated Aging Test Permeability - Minimum 0.4 perms ASTM E 96/E 96M Fire Resistance - Negligible affect on ASTM E 119 fire resistance rating over 3 hour test (Classified by UL for use over fibrous and cementitious sprayed fireproofing) Impact Resistance - Minimum ASTM D 2794 43 in/lb Gardner Impact Test Flexibility - no rupture or cracking ASTM D 522 Mandrel Bend Test 2.1.3 Penetrating Encapsulant Test Standard Requirement Flame Spread - 25, Smoke Emission - 50 ASTM E 84 Life Expectancy - 20 years ASTM C 732 Accelerated Aging Test Permeability - Minimum 0.4 perms ASTM E 96/E 96M Cohesion/Adhesion Test -ASTM E 736 50 pounds of force/foot Fire Resistance - Negligible affect on ASTM E 119 fire resistance rating over 3 hour test (Classified by UL for use over fibrous and cementitious sprayed fireproofing) ASTM D 2794 Impact Resistance - Minimum 43 in/lb Gardner Impact Test Flexibility - no rupture or cracking ASTM D 522 Mandrel Bend Test 2.1.4 Lock-down Encapsulant Requirement Test Standard Flame Spread: 25, Smoke Emission - 50 ASTM E 84 Life Expectancy: 20 years ASTM C 732 Accelerated Aging Test Permeability: Minimum 0.4 perms ASTM E 96/E 96M

Fire Resistance: Negligible affect on ASTM E 119 fire resistance rating over 3 hour test (Tested with fireproofing over encapsulant applied directly to steel member)

Bond Strength: 100 pounds of force/foot ASTM E 736 (Tests compatibility with cementitious and fibrous fireproofing)

PART 3 - EXECUTION

3.1 EQUIPMENT

- A. At all times, provide the COR or the COR's Representative, with at least two complete sets of personal protective equipment as required for entry to and inspection of the asbestos control area. Provide equivalent training to the COR or a designated representative as provided to Contractor employees in the use of the required personal protective equipment. Provide manufacturer's certificate of compliance for all equipment used to contain airborne asbestos fibers.
- 3.1.1 Respirators
 - A. Select respirators from those approved by the National Institute for Occupational Safety and Health (NIOSH), Department of Health and Human Services.
- 3.1.1.1 Respirators for Handling Asbestos
 - A. Provide personnel engaged in pre-cleaning, cleanup, handling, removal of asbestos materials with respiratory protection as indicated in 29 CFR 1926.1101 and 29 CFR 1926.103.
- 3.1.2 Exterior Whole Body Protection
- 3.1.2.1 Outer Protective Clothing
 - A. Provide personnel exposed to asbestos with disposable "nonbreathable," whole body outer protective clothing, head coverings, gloves, and foot coverings. Provide disposable plastic or rubber gloves to protect hands. Cloth gloves may be worn inside the plastic or rubber gloves for comfort, but shall not be used alone. Make sleeves secure at the wrists, make foot coverings secure at the ankles, and make clothing secure at the neck by the use of tape.
- 3.1.2.2 Work Clothing
 - A. Provide cloth work clothes for wear under the outer protective clothing and foot coverings and either dispose of or properly decontaminate them as recommended by the PQP after each use.

3.1.2.3 Personal Decontamination Unit

- A. Provide a temporary, negative pressure unit with a separate decontamination locker room and clean locker room with a shower that complies with 29 CFR 1926.51(f)(4)(ii) through (V) in between for personnel required to wear whole body protective clothing. Provide two separate lockers for each asbestos worker, one in each locker room. Keep street clothing and street shoes in the clean locker. HEPA vacuum and remove asbestos contaminated disposable protective clothing while still wearing respirators at the boundary of the asbestos work area and seal in impermeable bags or containers for disposal. Do not wear work clothing between home and work. Locate showers between the decontamination locker room and the clean locker room and require that all employees shower before changing into street clothes. Collect used shower water and filter with approved water filtration equipment to remove asbestos contamination. Dispose of filters and residue as asbestos waste. Discharge clean water to the sanitary system. Dispose of asbestos contaminated work clothing as asbestos contaminated waste. Decontamination units shall be physically attached to the asbestos control area. Build both a personnel decontamination unit and an equipment decontamination unit onto and integral with each asbestos control area.
- 3.1.2.4 Eye Protection
 - A. Provide goggles to personnel engaged in asbestos abatement operations when the use of a full face respirator is not required.
- 3.1.3 Warning Signs and Labels
 - A. Provide warning signs printed in English and Spanish at all approaches to asbestos control areas. Locate signs at such a distance that personnel may read the sign and take the necessary protective steps required before entering the area. Provide labels and affix to all asbestos materials, scrap, waste, debris, and other products contaminated with asbestos.

3.1.3.1 Warning Sign

A. Provide vertical format conforming to 29 CFR 1926.200, and 29 CFR 1926.1101 minimum 20 by 14 inches displaying the following legend in the lower panel: Legend

Notation

e inch Sans Serif thic or Block
e inch Sans Serif thic or Block
4 inch Sans Serif thic or Block
4 inch Gothic
4 inch Gothic
, , ,

- B. Spacing between lines shall be at least equal to the height of the upper of any two lines.
- C. THIS WARNING SIGN SHALL ALSO BE POSTED ON THE EXTERIOR OF THE DOOR LEADING TO THE WORK AREA AT THE CONCLUSION OF THE PROJECT.

3.1.3.2 Warning Labels

A. Provide labels conforming to 29 CFR 1926.1101 of sufficient size to be clearly legible, displaying the following legend:

DANGER

CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST

CANCER AND LUNG DISEASE HAZARD

BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM

3.1.4 Local Exhaust System

A. Provide a local exhaust system in the asbestos control area in accordance with AIHA Z9.2 and 29 CFR 1926.1101 that will provide at least four air changes per hour inside of the negative pressure enclosure. Local exhaust equipment shall be operated 24 hours per day, until the asbestos control area is removed and shall be leak proof to the filter and equipped with HEPA filters. Maintain a minimum pressure differential in the control area of minus 0.02 inch of water column relative to adjacent, unsealed areas. Provide continuous 24-hour per day monitoring of the pressure differential with a pressure differential automatic recording instrument. In no

case shall the building ventilation system be used as the local exhaust system for the asbestos control area. Filters on exhaust equipment shall conform to AIHA Z9.2 and UL 586. The local exhaust system shall terminate out of doors and remote from any public access or ventilation system intakes.

3.1.5 Tools

A. Vacuums shall be leak proof to the filter and equipped with HEPA filters. Filters on vacuums shall conform to AIHA Z9.2 and UL 586. Do not use power tools to remove asbestos containing materials unless the tool is equipped with effective, integral HEPA filtered exhaust ventilation systems. Remove all residual asbestos from reusable tools prior to storage or reuse.

3.1.6 Rental Equipment

A. If rental equipment is to be used, furnish written notification to the rental agency concerning the intended use of the equipment and the possibility of asbestos contamination of the equipment.

3.1.7 Glovebags

A. Submit written manufacturers proof that glovebags will not break down under expected temperatures and conditions.

3.2 WORK PROCEDURE

A. Perform asbestos related work in accordance with 29 CFR 1926.1101, 40 CFR 61-SUBPART M, and as specified herein. Use wet removal procedures and negative pressure enclosure and glovebag techniques. Personnel shall wear and utilize protective clothing and equipment as specified herein. Eating, smoking, drinking, chewing qum, tobacco, or applying cosmetics shall not be permitted in the asbestos work or control areas. Personnel of other trades not engaged in the removal and demolition of asbestos containing material shall not be exposed at any time to airborne concentrations of asbestos unless all the personnel protection and training provisions of this specification are complied with by the trade personnel. Shut down the building heating, ventilating, and air conditioning system, cap the openings to the system, and provide temporary ventilation prior to the commencement of asbestos work. All electrical work shall be performed by a licensed electrician. Disconnect electrical service when wet removal is performed and provide temporary electrical service with verifiable ground fault circuit interrupter (GFCI) protection prior to the use of any water. If an asbestos fiber release or spill occurs outside of the asbestos control area, stop work immediately, correct the condition to the satisfaction of the COR including clearance sampling, prior to resumption of work.

- 3.2.1 Protection of Existing Work to Remain
 - A. Perform work without damage or contamination of adjacent work. Where such work is damaged or contaminated as verified by the COR using visual inspection or sample analysis, it shall be restored to its original condition or decontaminated by the Contractor at no expense to the Government as deemed appropriate by the COR. This includes inadvertent spill of dirt, dust, or debris in which it is reasonable to conclude that asbestos may exist. When these spills occur, stop work immediately. Then clean up the spill. When satisfactory visual inspection and air sampling results are obtained from the PQP work may proceed at the discretion of the COR.
- 3.2.2 Precleaning
 - A. Wet wipe and HEPA vacuum all surfaces potentially contaminated with asbestos prior to establishment of an enclosure.
- 3.2.3 Asbestos Control Area Requirements
- 3.2.3.1 Negative Pressure Enclosure
 - A. For the removal of asbestos-containing pipe fitting insulation and pipe fitting insulation debris a negative pressure full enclosure shall be used. Block and seal openings in areas where the release of airborne asbestos fibers can be expected. Establish an asbestos negative pressure enclosure with the use of curtains, portable partitions, or other enclosures in order to prevent the escape of asbestos fibers from the contaminated asbestos work area. The work area shall be prepared as required to perform the work described described by the drawings. Negative pressure enclosure development shall include protective covering of uncontaminated walls, and ceilings with a continuous membrane of two layers of minimum 6-mil plastic sheet sealed with tape to prevent water or other damage. Provide two layers of 6-mil plastic sheet over floors and extend a minimum of 12 inches up walls. Seal all joints with tape. Provide local exhaust system in the asbestos control area. Openings will be allowed in enclosures of asbestos control areas for personnel and equipment entry and exit, the

supply and exhaust of air for the local exhaust system and the removal of properly containerized asbestos containing materials. Replace local exhaust system filters as required to maintain the efficiency of the system. The curtains, portable partitions, or other enclosures used to establish the negative pressure enclosure shall be left in place following the asbestos abatement work until the work in the basement is complete.

3.2.3.2 Glovebag

- A. The construction of a negative pressure enclosure is required for the removal of absestos-containing pipe fitting insulation located in the basements of Buildings #50, #53 and #71. Glovebags may be used to remove pipe fitting insulation in the negative pressure enclosure in accordance with 29 CFR 1926.1101 The PQP shall conduct personal samples of each worker engaged in asbestos handling (removal, disposal, transport and other associated work) throughout the duration of the project. If the quantity of airborne asbestos fibers monitored at the breathing zone of the workers at any time exceeds background or 0.01 fibers per cubic centimeter whichever is greater, stop work, evacuate personnel in adjacent areas or provide personnel with approved protective equipment at the discretion of the COR. This sampling may be duplicated by the Government at the discretion of the COR. If the air sampling results obtained by the Government differ from those obtained by the Contractor, the Government will determine which results predominate. If adjacent areas are contaminated as determined by the COR, clean the contaminated areas, monitor, and visually inspect the area as specified herein.
- 3.2.4 Removal Procedures
 - A. Wet asbestos material with a fine spray of amended water during removal, cutting, or other handling so as to reduce the emission of airborne fibers. Remove material and immediately place in 6 mil plastic disposal bags. Remove asbestos containing material in a gradual manner, with continuous application of the amended water or wetting agent in such a manner that no asbestos material is disturbed prior to being adequately wetted. Where unusual circumstances prohibit the use of 6 mil plastic bags, submit an alternate proposal for containment of asbestos fibers to the COR for approval. For example, in the case where both piping and insulation are to be

removed, the Contractor may elect to wet the insulation, wrap the pipes and insulation in plastic and remove the pipe by sections. Asbestos containing material shall be containerized while wet. At no time shall asbestos material be allowed to accumulate or become dry. Lower and otherwise handle asbestos containing material as indicated in 40 CFR 61-SUBPART M.

3.2.4.1 Sealing Contaminated Items Designated for Disposal

- A. Remove contaminated architectural, mechanical, and electrical appurtenances such as venetian blinds, full-height partitions, carpeting, duct work, pipes and fittings, radiators, light fixtures, conduit, panels, and other contaminated items designated for removal by completely coating the items with an asbestos lock-down encapsulant at the demolition site before removing the items from the asbestos control area. These items need not be vacuumed. The asbestos lockdown encapsulant shall be tinted a contrasting color. It shall be spray-applied by airless method. Thoroughness of sealing operation shall be visually gauged by the extent of colored coating on exposed surfaces. Lock-down encapsulants shall comply with the performance requirements specified herein.
- 3.2.4.2 Exposed Pipe Insulation Edges
 - A. Contain edges of asbestos insulation to remain that are exposed by a removal operation. Wet and cut the rough ends true and square with sharp tools and then encapsulate the edges with a 1/4 inch thick layer of non-asbestos containing insulating cement troweled to a smooth hard finish. When cement is dry, lag the end with a layer of non-asbestos lagging cloth, overlapping the existing ends by at least 4 inches. When insulating cement and cloth is an impractical method of sealing a raw edge of asbestos, take appropriate steps to seal the raw edges as approved by the COR.
- 3.2.4.3 Removal of Asbestos-Containing Thermal System Insulations
 - A. Asbestos-containing thermal system insulations on runs, elbows, tee's, and valves shall be removed utilizing a full containment, negative pressure enclosure work area. Prepare full containment work area as previously specified. Remove the thermal system insulation in small sections and immediately place into bottom of 6-mil thickness disposal bag. Make every effort to keep the material from falling to the floor of the work area. Do not allow dust or debris to accumulate on the

floor or other surfaces of the work area. After removing, wet brush and wet clean the exposed pipe to remove residual material. Bag asbestos and debris which has fallen to the floor as asbestos containing debris. Continue wet cleaning and HEPA vacuuming until surfaces are free of visible material.

3.2.4.4 Negative Pressure Glovebags

A. Perform all work in accordance with 29 CFR 1926.1101. Establish a negative pressure enclosure and regulated work area as previously specified. Negative pressure glovebags shall be a minimum of 6-mil thick plastic with seamless bottom. Spread one layer of 6-mil seamless plastic sheeting on the floor below the work area. Wet wipe the outside of the insulation and sprayed with an encapsulant prior to the bag being placed on the pipe. Place all necessary tools for removal operation in glovebag before attaching to pipe. Place at least one layer of cut tape around the pipe at each location where the glove bag will be attached to ensure an airtight seal. Secure glovebag to pipe with sufficient duct tape to ensure the bag does not pull loose during removal. Attach the HEPA-vacuum unit to the glovebag to provide negative pressure in the bag. Smoke test the glove bag prior to any abatement work. If a leak is detected reseal and retest the bag. Turn on the HEPA vacuum to clear the smoke and further test the seal. Modify the glovebag as to allow make-up air to enter the bag but not leave the bag. This is accomplished with the addition of a plastic flap which is taped inside the bag over an opening cut into the bag. Negative ventilation is created prior to any abatement work and is maintained throughout the use of the bag. Each glovebag can only be used once and may not be moved. Utilize two workers per glovebag. One shall remove the insulation, the other shall operate the water sprayer, ensure negative pressure and repair any leaks. Both workers are to wear proper protective clothing and respirators. At all times, keep the insulation thoroughly wet. Care shall be taken not to puncture the bag during removal. Gently remove insulation from the pipe, brush and wet clean pipe to remove residual Continue wet cleaning until the pipe surface is clean of material. visible material. Notify the PQP for visual inspection. Encapsulate and double seal with duct tape ends of remaining pipe insulation. Spray the inside of the bag with amended water and remove the watering wand, taping the water sleeve closed. Using the HEPA vacuum,

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collapse the bag and seal off lower portion containing asbestos materials. HEPA vacuum and wet wipe remaining portion of glovebag and tools. Keep tools in one arm of glovebag which will be sealed off and removed for next glovebag. Encapsulate abated section of pipe. The PQP shall conduct personal samples of each worker engaged in asbestos handling (removal, disposal, transport and other associated work) throughout the duration of the project. If the quantity of airborne asbestos fibers monitored at the breathing zone of the workers at any one time exceeds background or 0.01 fibers per cubic centimeter whichever is greater, stop work, and immediately correct the situation. This air sampling may be duplicated by the Government at the discretion of the COR. If the air sampling results obtained by the Government differ from those obtained by the Contractor, the Governments will determine which results predominate. If adjacent areas are contaminated as determined by the COR, clean the contaminated areas, monitor, and visually inspect the area as specified herein.

3.2.4.5 Clean up as Asbestos Debris

- A. Establish a negative pressure enclosure and regulated work area as previously specified. Remove all asbestos debris from the concrete floor, piping components, etc. in the basement work areas using wet methods and HEPA vacuums as required. Dry sweeping is prohibited. Use vacuums equipped with HEPA filter, disposable dust bag, and metal floor tool (no brush) to clean floors. If the airborne fiber concentration of the workers or at designated limits at any time exceeds background or 0.01 fibers per cubic centimeter, whichever is greater, stop work immediately and correct the situation.
- 3.2.5 Air Sampling
 - A. Sampling of airborne concentrations of asbestos fibers shall be performed in accordance with 29 CFR 1926.1101 and as specified herein. Sampling performed in accordance with 29 CFR 1926.1101 shall be performed by the PQP. Sampling performed for environmental and quality control reasons shall be performed by the PQP. Unless otherwise specified, use NIOSH Method 7400 for sampling and analysis. Monitoring may be duplicated by the Government at the discretion of the COR. If the air sampling results obtained by the Government

differ from those results obtained by the Contractor, the Government will determine which results predominate.

- 3.2.5.1 Sampling Prior to Asbestos Work
 - A. Provide area air sampling and establish the baseline one day prior to the masking and sealing operations for each removal site. Establish the background by performing area sampling in similar but uncontaminated sites in the building.
- 3.2.5.2 Sampling During Asbestos Work
 - A. The PQP shall provide personal and area sampling as indicated in 29 CFR 1926.1101 and governing environmental regulations. In addition, provided the same type of work is being performed, provide area sampling at least once every work shift close to the work inside the enclosure, outside the clean room entrance to the enclosure, and at the exhaust opening of the local exhaust system. If sampling outside the enclosure shows airborne levels have exceeded background or 0.01 fibers per cubic centimeter, whichever is greater, stop all work, correct the condition(s) causing the increase, and notify the COR immediately. Where alternate methods are used, perform personal and area air sampling at locations and frequencies that will accurately characterize the evolving airborne asbestos levels.
- 3.2.5.3 Sampling After Final Clean-Up (Clearance Sampling)
 - A. Provide area sampling of asbestos fibers using aggressive air sampling techniques as defined in the EPA 560/5-85-024 and establish an airborne asbestos concentration of less than 0.01 fibers per cubic centimeter after final clean-up but before removal of the enclosure or the asbestos work control area. After final cleanup and the asbestos control area is dry but prior to clearance sampling, the PQP shall perform a visual inspection in accordance with ASTM E 1368 to ensure that the asbestos control and work area is free of any accumulations of dirt, dust, or debris. Prepare a written report signed and dated by the PQP documenting that the asbestos control area is free of dust, dirt, and debris and all waste has been removed. Use transmission electron microscopy (TEM) to analyze clearance samples and report the results in accordance with current NIOSH criteria. The asbestos fiber counts from these samples shall be less than 0.01 fibers per cubic centimeter or be not greater than the background, whichever is greater. Should any of the final samples indicate a higher value, the

Contractor shall take appropriate actions to re-clean the area and shall repeat the sampling and TEM analysis at the Contractor's expense.

3.2.6 Lock-Down

- A. Prior to removal of plastic barriers and after pre-clearance clean up of gross contamination, the PQP shall conduct a visual inspection of all areas affected by the removal in accordance with ASTM E 1368. Inspect for any visible fibers. A post removal (lock-down) encapsulant shall then be spray applied to ceiling, walls, floors and other areas exposed in the removal area. The exposed area shall include but not be limited to plastic barriers, furnishings and articles to be discarded as well as dirty change room, air locks for bag removal and decontamination chambers.
- 3.2.7 Site Inspection
 - A. While performing asbestos engineering control work, the Contractor shall be subject to on-site inspection by the COR who may be assisted by or represented by safety or industrial hygiene personnel. If the work is found to be in violation of this specification, the COR or his representative will issue a stop work order to be in effect immediately and until the violation is resolved. All related costs including standby time required to resolve the violation shall be at the Contractor's expense.

3.3 CLEAN-UP AND DISPOSAL

3.3.1 Housekeeping

A. Essential parts of asbestos dust control are housekeeping and clean-up procedures. Maintain surfaces of the asbestos control area free of accumulations of asbestos fibers. Give meticulous attention to restricting the spread of dust and debris; keep waste from being distributed over the general area. Use HEPA filtered vacuum cleaners. DO NOT BLOW DOWN THE SPACE WITH COMPRESSED AIR. When asbestos removal is complete, all asbestos waste is removed from the work-site, and final clean-up is completed, the COR will attest that the area is safe before the signs can be removed. After final clean-up and acceptable airborne concentrations are attained but before the HEPA unit is turned off and the enclosure removed, remove all pre-filters on the building HVAC system and provide new pre-filters. Dispose of filters as asbestos contaminated materials. Reestablish HVAC mechanical, and

electrical systems in proper working order. The COR will visually inspect all surfaces within the enclosure for residual material or accumulated dust or debris. The Contractor shall re-clean all areas showing dust or residual materials. If re-cleaning is required, air sample and establish an acceptable asbestos airborne concentration after re-cleaning. The COR must agree that the area is safe in writing before unrestricted entry will be permitted. The Government shall have the option to perform monitoring to determine if the areas are safe before entry is permitted.

3.3.2 Title to Materials

- A. All waste materials, except as specified otherwise, shall become the property of the Contractor and shall be disposed of as specified in applicable local, State, and Federal regulations and herein.
- 3.3.3 Disposal of Asbestos

3.3.3.1 Procedure for Disposal

A. Collect asbestos waste, asbestos contaminated water, scrap, debris, bags, containers, equipment, and asbestos contaminated clothing which may produce airborne concentrations of asbestos fibers and place in sealed fiber-proof, waterproof, non-returnable containers (e.g. double plastic bags 6 mils thick, cartons, drums or cans). Wastes within the containers must be adequately wet in accordance with 40 CFR 61-SUBPART M. Affix a warning and Department of Transportation (DOT) label to each container including the bags or use at least 6 mils thick bags with the approved warnings and DOT labeling preprinted on the bag. The name of the waste generator and the location at which the waste was generated shall be clearly indicated on the outside of each container. Prevent contamination of the transport vehicle (especially if the transport vehicle is a rented truck likely to be used in the future for non-asbestos purposes). These precautions include lining the vehicle cargo area with plastic sheeting (similar to work area enclosure) and thorough cleaning of the cargo area after transport and unloading of asbestos debris is complete. Dispose of waste asbestos material at an Environmental Protection Agency (EPA) or State-approved asbestos landfill off Government property. For temporary storage, store sealed impermeable bags in asbestos waste drums or skids. An area for interim storage of asbestos waste-containing drums or skids will be assigned by the COR or his authorized representative.

Procedure for hauling and disposal shall comply with 40 CFR 61-SUBPART M, State, regional, and local standards. Sealed plastic bags may be dumped from drums into the burial site unless the bags have been broken or damaged. Damaged bags shall remain in the drum and the entire contaminated drum shall be buried. Uncontaminated drums may be recycled. Workers unloading the sealed drums shall wear appropriate respirators and personal protective equipment when handling asbestos materials at the disposal site.

- 3.3.3.2 Asbestos Disposal Quantity Report
 - A. Direct the PQP to record and report, to the COR, the amount of asbestos containing material removed and released for disposal. Deliver the report for the previous day at the beginning of each day shift with amounts of material removed during the previous day reported in linear feet or square feet as described initially in this specification and in cubic feet for the amount of asbestos containing material released for disposal.

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