# ASBESTOS HAZARD ABATEMENT PLAN USPS PROCESSING FACILITY CENTER PORTLAND

At:

USPS Processing Facility 715 NW Hoyt Street Portland, Oregon 97209



**May 5, 2022** Revised August 7, 2022

## **NetCompliance Environmental Services, LLC**

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## ASBESTOS HAZARD ABATEMENT PLAN USPS PROCESSING FACILITY PORTLAND

At:

## USPS 715 NW HOYT STREET PORTLAND, OREGON 97209

Property Owner:	Prepared For:
Prosper Portland 220 NW 2 <sup>nd</sup> Avenue, Suite 200 Portland, OR 97209	Northwest Demolition and Dismantling 82000 SW Hunziker Street Tigard, OR 97223
Plan Reviewed By:	Plan Prepared By:
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NCES Project # 38-001393	Contract / Task Order # 2234-S001

#### **Provided By:**

### **NetCompliance Environmental Services, LLC**

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#### REFERENCE MATERIAL

NCES Accident Prevention Program

NCES Project Book

NCES General Health and Safety Plan

NCES SDS Book

OSHA Asbestos Abatement Regulations Book

Activity Hazard Analysis (AHA)

Licenses & Certifications

#### 1.0 INTRODUCTION

This site-specific Asbestos Hazard Abatement Plan (AHAP) describes responsibilities, training requirements, protective equipment, and operating procedures required or considered necessary to conduct the controlled abatement of asbestos containing materials and minimize and/or eliminate the impact of the asbestos removal activities to workers, adjacent areas, and the environment. This plan also addresses health and safety, occupational exposures, environmental issues, storage, and disposal for materials containing or contaminated with asbestos.

#### 1.1 Plan Development

NetCompliance Environmental Services, LLC (NCES) is under contract with Northwest Demolition and Dismantling to carry out asbestos abatement activities. The activities will involve the disturbance of Asbestos Containing Materials (ACM) and NCES developed this AHAP to be utilized for the project and supplement NCES' Accident Prevention Plan (APP). A copy of the NCES APP will be maintained on site as well as a copy of the project specifications pertaining to the asbestos and hazardous materials abatement.

Work and environmental conditions at this site may change over the course of the project; as such, this AHAP is dynamic and shall be modified to encompass changes that occur in work conditions and/or other unanticipated events and hazards. Any modifications to the plan will be incorporated in writing prior to work. All work will be performed according to Federal and State regulations as follows to meet DEQ regulations.

#### 1.1.1 Administrative Rule (OAR) 340-248-0270(5)

Upon discovering asbestos-containing materials or asbestos-containing waste materials found during demolition, renovation, or after an emergency or unexpected event including an event that causes fire, water, earthquake, or wind damage, the owner or operator of the demolition or renovation activity or the owner or operator performing the emergency response must:

- (a) Stop work immediately.
- (b) Keep the exposed asbestos-containing materials and asbestos-containing waste material, adequately wet and cover with 6 mil plastic or equivalent at all times until a licensed asbestos abatement contractor begins removal activities in compliance with this division: and
- (c) Have the licensed asbestos abatement contractor remove, handle, and dispose of all friable asbestos-containing waste material and asbestos-containing waste material as friable asbestos-containing material."

#### 1.2 Standards & Regulations

Asbestos is well recognized as a health hazard and is highly regulated. The United States Environmental Protection Agency (EPA) and the United States Occupational Safety Health Administration (OSHA) asbestos regulations are intertwined in this area. This AHAP was prepared to comply with the current requirements of state and federal regulations pertaining to Health and Safety. Oregon Department of Environmental Quality (DEQ) requires notification for asbestos removal. Specifically, this plan uses the following reference sources in the preparation of the AHAP:

#### Federal OSHA Hazardous Waste Operations and Emergency Response

Reference; (29 CFR 1910.120)

## The U.S. Department of Transportation (DOT) Emergency Response Guides

**United States Environmental Protection Agency - Region 10 (US-EPA)** 

Reference; 40 CFR Part 61 Subpart M (NESHAP) (http://www.epa.gov/asbestos/)

#### Occupational Safety and Health Administration (OSHA)

Reference; 29 CFR 1926.1101 Subpart Z, Appendences A to K

#### Oregon Department of Environmental Quality (OR DEQ)

Reference: OAR 340-248

Regulation Adopted by Reference

#### Oregon Occupational Safety and Health (OR OSHA)

Reference; OAR 437, Division 3, Subdivision Z, 1926.1101 Asbestos

#### **US Army Corps of Engineers (USACE)**

Reference: EM 385-1-1 Safety & Health Manual

#### 2.0 KEY PERSONNEL

Project Manager:	
NCES Safety Manager:	Eric Maughan
Office Number	(360) 699-4015
Mobile Number	(260) 396-7190
Company	NCES
Competent Person, SSHO	D1 :1 G 1
OR Asbestos Supervisor:	Placido Saucedo
Office Number	(360) 699-4015
Mobile Number	(360) 984-1440
Company	NCES
NCEC Industrial Hearing of Consultant	
NCES Industrial Hygienist Consultant     Creat Northwest Environmental Inc.	Ms. Sonia Benintendi
<ul><li> Great Northwest Environmental, Inc.</li><li> Back up OR Supervisor:</li></ul>	John Marshall – NCES IH
Office Number	(360) 699-4015
Mobile Number	(360) 921-0452
Company	NCES
<b>-</b>	
• Client Project Manager:	Chad Hoffart
Office Number	(877) 598-9706
Mobile Number	(503) 209-0924
Company	NW Demolition
• Client Project Superintendent:	Ben Wright
Office Number	(877) 598-9706
Mobile Number	(611) 576 7100
Company	NW Demolition
1 7	
• Owner's Representative:	
Office Number	-
Mobile Number	
Company	Prosper Portland
	Clark Nelson, CIH
Owner's Environmental Consultant:	
Office Number	(503) 417-7691
Mobile Number	(503) 209-3067
Company	PBS Environmental

#### 3.0 ORGANIZATION AND RESPONSIBILITIES

#### 3.1 Project Manager

The Project Manager has the responsibility and authority to direct all hazardous material operations. These duties will include, but not be limited to, designation of the Competent Person and the initiation of the AHAP.

The Project Manager will maintain communications with the Competent Person while any NCES personnel are on-site. The Project Manager will designate a qualified and knowledgeable representative to act in his behalf in his absence.

#### 3.2 Contractor's Safety Representative

The Safety Representative will be the OSHA knowledgeable individual responsible for implementing the AHAP. In the absence of the NCES Safety Representative, these responsibilities shall fall to another individual knowledgeable in occupational health and safety acting on behalf NCES. This individual will:

- Designate the Contractor's Representative to certify the AHAP.
- Ensure that personnel and site visitors are aware of the provisions of this plan, are instructed in their work practices to ensure safety, and understand the planned procedures.
- Ensure that all personnel are aware of the potential hazards associated with abatement operations.
- Implement the AHAP and notify the Contractor's Representative of changing site conditions.
- Require personnel protection levels and necessary clothing and equipment to ensure the safety of all personnel.
- Notify Oregon OSHA by phone within 8 hours in the event of a fatal or possibly fatal injury, injury requiring in-patient hospitalization, or a catastrophe (an accident in which five or more site workers seek or are sent for medical attention) at the work site.
- Correct any work practices or conditions that may result in injury or exposure to hazardous materials.

#### 3.3 Industrial Hygienist (IH)

The Industrial Hygienist is responsible for the certification of the AHAP and all additions and/or modifications thereto. This individual will:

- Be accessible to the Client's Representative.
- Assist in the evaluation of potential asbestos hazards and, when requested, the development of appropriate procedures for addressing known or suspected conditions or activities that may pose routine occupational hazards or immediate danger to the life or health of site personnel.
- Assist the Safety Representative, when requested, with the technical and administrative aspects of tasks associated with hazardous containing materials.

- Determine asbestos personal protection levels and necessary clothing and equipment to ensure the safety of personnel. This information will be provided to personnel and visitors and compliance by these individuals is mandatory.
- Evaluate work practices or conditions that may result in exposure to asbestos containing materials. Site personnel will be expected to correct unsafe work practices and or conditions not meeting the intent of this AHAP promptly. Failure to do so may result in temporary suspension of the field activities until corrective action is completed to the satisfaction of the Project Manager or Competent Person and/or Client's Representative.

#### 3.4 Competent Person / Site Supervisor

The Competent Person / Site Supervisor will be Oregon State certified asbestos abatement supervisor and the OSHA knowledgeable individual for day-to-day monitoring of abatement activities and documenting compliance with the AHAP and site control as associated with personnel under its control. In the absence of Competent Person, these responsibilities will fall to another individual knowledgeable in occupational health and safety acting on behalf of NCES; i.e., another designated Competent Person.

During abatement activities, NCES employees are to report all health and safety related incidents/accidents or problems to the Competent Person (or the senior NCES individual on site). The Competent Person is to report incidents/accidents or other serious site problems to the Contractor's Safety Representative. If not available, the following chain or reporting tree should be followed:

- Project Manager
- Contractor's Representative
- Client's Representative

The Competent Person will be on site and present during all abatement work. Such work includes but is not limited to: Hazardous Material Handling, contaminant management, air monitoring, and all work related to the presence or potential for contact with hazardous containing materials. This individual will:

- Verify that appropriate personal protection equipment is available and properly utilized by all employees in the regulated areas.
- Evaluate all site hazard information and make any necessary modifications to work plans and personnel protection levels after consulting with the Contractor's Safety Representative to maintain site personnel safety.
- Verify that the project is being conducted in a safe manner.
- Possess valid First Aid and Cardiopulmonary Resuscitation (CPR) certifications.
- Inform all personnel of the specific hazards and safety precautions required at each work area.
- Administer the AHAP during all abatement operations.
- Document that all personnel entering areas where there is a potential for exposure meet federal and state training and medical monitoring regulations.
- Ensure that air monitoring as outlined in the AHAP in conducted.

- Verify that onsite and offsite emergency communications systems are operational.
- Establish and maintain site control measures such as regulated and decontamination areas.
- Design and implement an effective decontamination process.
- Document that all personnel and equipment leaving the regulated area have been effectively decontaminated.
- Conduct Pre-Task Briefings.
- Complete and submit records and forms as necessary.
- Hold the responsibility and authority to stop work if a safety issue arises associated with asbestos containing material abatement activities.
- Enforce and monitor the AHAP during remediation activities.
- Conduct pre-abatement training, Pre-Task Briefings, and other periodic training of all onsite personnel with regard to contents of the AHAP and other safety requirements to be observed during abatement activities.
- Verify that workers' medical status and training are current before they commence work.

#### 3.5 Asbestos Workers

Asbestos Supervisors & Workers will be trained in all aspects of asbestos removal and handling, including: set up and maintenance of engineering controls, removal and handling of asbestos containing materials, proper waste packaging and manifesting of ACM materials, trained to identify other potential asbestos containing materials should they be encountered, and other practices for reducing the hazard.

Workers completing abatement tasks will be responsible for the following:

- Perform work as described by Contractor Representative, Safety Representative, and Competent Person.
- Read and agree to follow the AHAP.
- Conduct their work in a safe manner.
- Report all hazards to the Competent Person and/or Safety Representative for corrective action.
- Report faulty equipment to the Competent Person and/or Safety Representative.
- Notify the Competent Person or Project Manager within 24 hours of any signs or symptoms of illness that they feel may be related to potential exposures.

#### 4.0 PROPERTY INFORMATION & SCOPE OF WORK

#### 4.1 Project Name & Location:

USPS Processing Facility 715 NW Hoyt Street Portland, OR 97209

Project Site:	Site Owner:
USPS Processing Facility	Prosper Portland
715 NW Hoyt Street	220 NW 2 <sup>nd</sup> Avenue, Suite 200
Portland, OR 97209	Portland, OR 97209

#### 4.2 Survey Report(s) and Historical Data:

The identification of the friable and non-friable asbestos containing building materials was provided by PBS Hazardous Building Materials Survey Report.

Notification to DEQ and is attached to this document.

#### 4.3 Project Buildings/Areas & SOW/Potential Work Sequence

Work Area 1	Tunnel System		
Asbestos SOW			
Description	Location	Type of Removal Respirator	Approx. Quantities
Fire Door	Tunnel	Class 1 Friable, Intact Half Face	1 EA
Insulation Wrap	Tunnel	Class 1 Friable, Intact Half Face	2 LF
Duct Seam Tape	Tunnel	Class 1 Friable, Intact Half Face	25 LF
Asphaltic Membrane	Tunnel (Subgrade on exterior walls)	Exempt, Non-Friable	53,000 SF
Asphaltic Membrane	Tunnel (Subgrade below slab floor)	Exempt, Non-Friable	34,000 SF

• Asphaltic Membrane is listed in the *Work Area 1* as "Exempt, Non-Friable". Please note that if the condition of this asbestos-containing material changes deemed by certified AHERA Building Inspector from PBS and/or it is rendered friable during demolition activities, the exemption in OAR 340-248-0250(1)(e) is void and all applicable asbestos rules must be followed.

Work Area 2	First Floor		
Asbestos SOW			
Description	Location	Type of Removal Respirator	Approx. Quantities
Duct Seam Tape	First Floor	Class 1 Friable, Intact Half Face	10,000 LF
Floor Tile and Mastic	First Floor	Class 2 Non-Friable, PAPR/Half Face	108,892 SF
Hard Fitting Insulation	First Floor	Class 1 Friable, Intact Half Face	1,300 EA
Fire Doors	First Floor	Class 1 Friable, Intact Half Face	20 EA
Electrical Backer Boards	First Floor	Class 2 Non-Friable,	50 EA

		PAPR/Half Face	
Leveling Compound Under SVF	First Floor	Class 2 Non-Friable, Intact	200 SF
Black Wall Tar on Exterior Elevator Shaft Wall	First Floor	Class 2 Non-Friable, Half Face	TBD

Work Area 3	Second Floor South Offices		
Asbestos SOW			
Description	Location	Type of Removal Respirator	Approx. Quantities
Duct Seam Tape	Second Floor	Class 1 Friable, Intact Half Face	1,500 LF
Floor Tile and Mastic	Second Floor	Class 2 Non-Friable, Half Face	14,160 SF
Fire Doors	Second floor	Class 1 Friable, Intact Half Face	25 EA
Electrical Backer Boards	Second floor	Class 2 Non-Friable, Half Face	5 EA
Black Wall Tar on Exterior Elevator Shaft Wall	Second Floor	Class 2 Non-Friable, Half Face	TBD

Work Area 4	Third Floor		
Asbestos SOW			
Description	Location	Type of Removal Respirator	Approx. Quantities
Duct Seam Tape	Third Floor	Class 1 Friable, Intact Half Face	6,500 LF
Floor Tile and Mastic	Third Floor	Class 2 Non-Friable, PAPR/Half Face	122,144 SF
Fire Doors	Third Floor	Class 1 Friable, Half Face	34 EA
Black Wall Tar on Exterio Elevator Shaft Wall	Third Floor	Class 2 Non-Friable, Half Face	TDB

Work Area 5	Fourth Floor		
Asbestos SOW			
Description	Location	Type of Removal Respirator	Approx. Quantities
Duct Seam Tape	Fourth Floor	Class 1 Friable, Intact Half Face	3,500 LF
Floor Tile and Mastic	Fourth Floor	Class 2 Non-Friable, Half Face	8,880 SF
Boiler Breaching	Fourth Floor	Class 1 Friable, PAPR	300 SF
Elevator Brake Shoes	Fourth Floor	Class 2 Non-Friable, Half Face	20 LF
Fire Doors	Fourth Floor	Class 1 Friable, Half Face	40 EA

Black Wall Tar on Exterior Elevator Shaft Wall	Fourth Floor	Class 2 Non-Friable, Half Face	TBD
Black wall tar from elevator equipment rooms	Above Fourth Floor	Class 2 Non-Friable, Half Face	2,440 SF

Work Area 6 Exte	erior of Building		
Asbestos SOW			
Description	Location	Type of Removal Respirator	Approx. Quantities
Asbestos Caulking Between the Louvers and Building Exterior	Exterior	Class 2 Non-Friable, Half Face	1,800 LF

1.4	Additions/Deletions to Scope of Work Summary				
		_			

#### 4.5 Anticipated Project Schedule

Work will be accomplished in accordance with the Owner's schedule and USACE sequencing.

• Date(s) of Work: September 26<sup>th</sup>, 2022

• Work Times: Monday – Thursday 7:00 am to 5:30 i.e., 4 – 10's per day

#### 4.6 Site Security & Traffic

NCES truck traffic for deliveries and load out will be scheduled with onsite NCES supervisor. Private vehicles will be stored in a designated area onsite.

#### 4.7 Temporary Utilities

Water will be obtained onsite from designated water source provided by Owner/GC. A temporary power boxes will be provided by Northwest Demolition for use during the abatement process for the entire ACM removal on this site.

#### 5.0 ACTIVITY HAZARD ANALYSIS (AHA)

An AHA will be developed for this project and provided onsite. The primary physical hazards anticipated during the project and the means to control them for the prevention of worker injury/illness are summarized in the AHA. The following general work hazards were identified during the development of the AHA. Any unidentified hazards will be addressed in the daily toolbox safety meeting.

- Falls (from height)
- Asbestos Abatement

#### 6.0 MEDICAL SURVEILLANCE PROGRAM

All workers who for a combined total of 30 or more days per year are engaged in Class I, II, and III work, or are exposed at or above the permissible exposure limit for combined 30 days or more per year; or who are required by the standard to wear negative pressure respirators are required to enter a medical surveillance program to reveal medical conditions that could predispose an individual to excess risk from working on this project, and provide clearance to wear a negative-pressure respirator prior to asbestos work. Annual medical visits (12 months) are generally required except if the employee has little no exposure over the course of their work.

#### 7.0 AIR MONITORING

#### 7.1 Air Monitoring & Analysis Companies

An NCES IH Technician or experienced asbestos supervisor with a minimum of two years of experience in asbestos planning and management on projects. All air sampling procedures will be in accordance with the NIOSH 7400 Method and/or OSHA ID 160.

NCES and/or NCES Consultant Great Northwest Environmental, Inc., will conduct the onsite phase contrast microscopy (PCM) analysis of air samples by an experienced onsite IH who is NIOSH 582 certified for Sampling and Analysis of Airborne Asbestos. NCES participates and has proficiency in the Proficiency Analytical Testing (PAT) program administered by AIHA and maintains a written quality control program that meets or exceeds American Industrial Hygiene Association (AIHA) standards.

In some instances (i.e., duplicate clearance samples, confirmation samples, transmission electron microscopy [TEM] or PCM clearances) may be analyzed offsite by an independent laboratory. NCES uses International Asbestos Testing Laboratories (iATL) or BATTA Labs for this analysis and both participate in the National Institute of Standards and Technology (NIST) National Voluntary Laboratory Accreditation Program (NVLAP) and in American Industrial Hygiene Association (AIHA) Laboratory Quality Assurance Programs.

Samples and chain-of-custody submittal sheets will be delivered via FedEx. The turn-a-round time for analysis is generally 2-4 days unless analysis is conducted on site.

Work Area Clearance(s): After the work area has passed the visual inspection, clearance samples (if required) will be completed by the Owners Environmental Consultant, PBS Environmental. Written sampling results shall be provided within 2 working days of the date of collection. A "Certificate of Visual Inspection" shall be completed by NCES and be certified/signed by the Owner or Owners Environmental Consultant Representative.

After completion of all cleaning work, a minimum of 1 sample will be collected to determine if the airborne fiber concentrations encountered during abatement operations have been reduced to an acceptable level.

• Final air clearance sampling will comply with OAR 340-248-0270(8)(k) and concentrations of airborne asbestos within the negative pressure enclosure (NPE) shall not exceed 0.01 fibers/cc of air in order to remove the NPE.

#### 7.2 Sampling Methods & Methodology

- **PCM Analysis Method:** NIOSH 7400 and or OSHA ID 160 method. Field blanks will be handled and submitted at a frequency of not less than 10% of the number of samples collected and/or minimum of two blanks.
- **TEM Analysis Method:** NIOSH 7402 method. Field blanks will be handled and submitted at a frequency of not less than 10% of the number of samples collected and/or minimum of two blanks.
- PCM Sample Media: Samples will be collected with a 25mm diameter open face cassette with a 50mm extension cowl and mixed cellulose ester membrane filter having a pore size equal to 0.8µm. The unused portion of the filter media will be returned to its original container and marked so that the samples can be easily retrieved and reanalyzed later if necessary. Samples will be stored for minimum of 90 days before disposal.
- TEM Sample Media: Samples will be collected with a 25mm diameter open face cassette with a 50mm extension cowl and mixed cellulose ester membrane filter having a pore size equal to 0.45µm. The unused portion of the filter media will be returned to its original container and marked so that the samples can be easily retrieved and reanalyzed later if necessary. Samples will be stored for minimum of 90 days before disposal.
- **Sampling Equipment**: All equipment shall be used according to the manufacturer's instructions.
- Low Volume Personnel Sampling: A low volume battery powered air pump operated at 0.5-4.0 liters per minute will be used for personnel exposure sampling.
- **High Volume Area Sampling:** High volume AC powered pump operated at 5-10 liters per minute will be used for area and post abatement/clearance sampling.

- Sample Pump Calibration: A secondary calibration device (rotameter) pre-calibrated by a primary calibration device (Gillibrator® soap bubble meter and/or by Dry Cal) will be used.
- **Microscope:** Analysis to be conducted on site utilizing Phase Contrast Microscopy (PCM) and calibrated with an HSE/NPL test slide in accordance with NIOSH 7400 method.

#### 7.3 Sample Documentation

Written project documentation will be kept for each filter sample procured as follows:

- Name of employer.
- Name of person conducting monitoring.
- The date of measurement.
- Address of operation or activity.
- Description of the operation or activity involving exposure to asbestos that is being monitored.
- Personal or area sample.
- Name and exposure level of the employees whose exposures are represented.
- Type of protective devices worn, if any.
- Pump calibration date and flow rate.
- Total volume of air sampled.
- Name and address of analytical laboratory.
- Number, duration, and results (f/cc) of samples taken.
- Date of analysis, and
- Sampling and analytical methods used and evidence of their accuracy.

Documentation will indicate in what areas tests were taken and shall clearly indicate the specified maximum allowable fiber levels for each area tested. A written Certification of Clearance will be provided following successful completion of clearance testing. The analyst will sign the air sampling records and/or post, submit or make available all samples analyzed within 48-hours from the end of the sampling shift. Clearance sample results will be performed by NCES 3<sup>rd</sup> party Independent consultant Great Northwest Environmental, Inc., and/or Owners Environmental Consulting firm PBS. The clearance sample results reporting time will be for the same day and/or may be the next day.

#### 7.4 Air Sampling Protocols and Types of samples

Throughout asbestos abatement operations, area inside/outside air monitoring will be conducted to ensure compliance with EPA and OR DEQ conducted by NCES Independent consultant Great Northwest Environmental, Inc., and/or owners Independent consultant PBS.

Each job category having potential exposure to asbestos will be subject to initial exposure assessment monitoring to determine if exposures are within acceptable limits; or additional requirements, corrective measures, or actions must be undertaken. If air monitoring results are unsatisfactory, NCES will make changes in the work procedures to assure compliance with minimum standards.

The client and/or Owner or Owner's Representative will be notified immediately if any results indicate fiber concentrations exceed established limits. Unsatisfactory results during the Work are fiber counts in excess of the following Maximum Acceptable Levels:

- 0.01 fibers per cubic centimeter (f/cc) inside non-contained regulated Work Areas.
- 0.1 f/cc inside Contained Work Areas.
- 0.01 f/cc outside the Work Area (or less than the ambient fiber levels outside the building if levels outside the building are greater than 0.01 f/cc).
- 1.0 f/cc for a personnel excursion limit, including the quantitative protection factor of the donned respirator in the personnel exposure calculation.
- 0.1 f/cc for a personnel sample during an 8-hour time-weighted average, including the quantitative protection factor of the donned respirator in the personnel exposure calculation.
- If airborne fiber concentrations exceed 1.0 f/cc, asbestos abatement work will cease, and work procedures revised to lower fiber concentrations to below 0.1 f/cc.

#### 7.4.1 Pre-Abatement Air Sampling

Pre-abatement air sampling (if required) will be completed by NCES or Owners Environmental Consultant prior to the start of asbestos work. The representative area monitoring is used for comparison to clearance monitoring and to determine background levels for comparison to area air monitoring.

#### 7.4.2 Personal Air Sampling

Air sampling will be conducted in the worker's breathing zone to verify that workers are not being exposed to levels above the Permissible Exposure Limit (PEL) and that respiratory protection is adequate. The following procedures as outlined by OSHA will be followed:

- Twenty-five percent of workers inside the regulated area will subject personal sampling by each task.
- Monitoring will be performed as often as is necessary to determine the best representation of 8-hour time-weighted average exposures and excursion limits for workers. At a minimum, the worker anticipated to be experiencing the highest exposure in each Work Area will be monitored each shift. Each unique task will be monitored.
- Samples will be collected during each shift, beginning with the first disturbance of the Asbestos Containing Materials and until the final cleanup is completed.

#### 7.4.3 Inside Work Area Monitoring

- At least two inside area samples will be collected during all work operations. Work conducted outdoors does not require area sampling.
- Air sampling inside a regulated area will be conducted at least once a day. This sample results shall be within allowable limits of 0.1f/cc.
- Air sampling inside an isolated area under local exhaust ventilation (NPE) will be conducted at least every day. This sample results shall meet within allowable limits of 0.1f/cc.

#### 7.4.4 Outside Work Area Monitoring

- Air sampling outside work area or regulated area will be conducted at least once a day and the samples will be placed directly outside and adjacent to the work area. These samples are conducted to verify ambient conditions outside the work area.
- Air sampling for the Pressure Differential Unit (PUD) will be conducted at least once a day to verify PUD Filter Leak Test if being utilized.
- Air sampling inside clean room or decontamination area will be conducted at least every other day to verify clean room contamination from the active containment.

#### 7.4.5 PCM Air Clearance Monitoring

Representative Final Clearance Samples must be taken at the completion of all abatement activities. Clearance air monitoring is not required for non-containment or outdoor asbestos work. The results of the monitoring must be below 0.01 f/cc (reported at a 95% upper confidence level) or Final air clearance sampling must follow the asbestos work practices in OAR 340-248-0270(8)(k)(B).

- After the work area has been final cleaned and has been visually inspected and certified clean by ASTM Practice E 1368, an approved encapsulant may be applied as applicable.
- After the area is allowed to dry sufficiently, aggressive air sampling will be conducted in each containment area.
- At least five (5) samples will be collected using a high-volume sampling pump set at 2 to 12 LPM for a minimum volume of 1200 liters per sample cassette. Samples will be analyzed using phase contrast microscopy (PCM) methods in accordance with NIOSH Method 7400 and determined to be <0.01 f/cc and/or Final air clearance sampling must follow the asbestos work practices in OAR 340-248-0270(8)(k)(B). If the results show that the Work Area has not been cleared, the area will be re-cleaned and/or encapsulated until the Work Area complies with established limits.

#### 8.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

#### 8.1 Respirator Program

NCES has instituted a respiratory program that meets the requirements of 29 CFR 1910.134. The Safety Representative and or designated Competent Person will brief NCES workers on the respirator selection process for this project. Some of the program elements are as follows.

- Use of NIOSH approved respirators
- Respirator selection and limitations
- Training for use, care, cleaning, and storage of respirator
- Clearance to wear a respirator by a physician
- Fit testing annually

#### **8.2** Respirator Selection

Respirator selection is based several factors and choosing the correct respiratory protection that will protect employees from the anticipated hazards during the project is essential.

Employers must use the assigned protection factors to select a respirator that meets or exceeds the required level of employee protection for the hazard. When using a combination respirator (e.g., airline respirators with an air-purifying filter), employers must ensure that the assigned protection factor is appropriate to the mode of operation in which the respirator is being used. Any powered air-purifying respirator (PAPR) or negative pressure air-purifying respirator must be equipped with HEPA filters or N-, R-, or P-100 series filters.

Employers must provide an employee with a tight-fitting, powered, air-purifying respirator (PAPR) instead of a negative-pressure respirator when an employee chooses to use a PAPR and the respirator provides the required protection to the employee.

#### **8.3** Exposure Assessment:

A negative exposure assessment and evaluation of employee exposure was conducted in accordance with 29 CFR 1926.1101 (f) and determined that personnel will not exceed permissible exposure limits. The assessment was based on past job experience, sampling and analytical data representing employee exposure during the use of such method under the worst-case conditions and by employees whose training and experiences are equivalent to employees who are to perform the current job. A project specific confirmation assessment will be conducted.

#### 8.4 Asbestos Personal Protective Equipment

All asbestos removal work requires PPE and the level of PPE is dependent on several factors and will vary. All PPE shall be inspected for defects and condition before use. The following PPE will be used or on hand for use during this project.

- Half-face air-purifying respirators with P-100 filter cartridges
- Disposable Hooded Clothing (Tyvek suit, disposable chemical-resistant or fire-retardant overalls)
- Rubber Boots, outer, neoprene, steel (toed) end shank

- Disposable Boot-Covers, (rubber, chemical-resistant, optional as applicable)
- Hard Hat
- Gloves (task specific)
- Eye Protection (safety glasses, goggles)
- Hearing protection (as applicable)

#### 8.5 Reassessment of PPE

The Competent Person may upgrade the Level of Protection provided by PPE upon a change in site conditions or findings as determined through exposure assessments. When a significant change occurs, the hazards should be reassessed. Some indicators of the need for reassessment are:

- The possibility of contact with hazardous chemical contaminated vapors.
- Commencement of a new work phase.
- Change in job tasks during a work phase.
- When temperature extremes or individual medical considerations limit the effectiveness of PPE.
- Encounters with contaminants other than those previously identified.
- Change in ambient levels of contaminants.
- Change in work scope that affects the degree of contact with contaminants.

#### 9.0 PERSONAL HYGIENE FACILITIES AND PRACTICES

All contamination must be removed from the employee and left at the job site so that exposure to the workers or their families is avoided subsequent to leaving the job site. All work areas will be maintained as free as practical of accumulation of hazardous material(s).

#### 9.1 Lunch Areas

Lunch facilities (if set up) will be set up in a clean area, away from all sources of contamination. Contaminated disposable protective clothing must be removed, and hands and face must be washed prior to eating, drinking, or smoking. Protective work clothing or equipment must be decontaminated or removed before entering the lunch area. The lunch area table (if used) must be cleaned immediately before and after each use. Signs will be displayed in the lunch area to this effect.

#### 10.0 DECONTAMINATION PROCEDURES

All contaminated materials, equipment, clothing, etc. must be properly decontaminated before leaving the site or be properly disposed of. All decontamination and disposal activities will occur within the designated areas. Respirators will be cleaned after each day's use.

#### 10.1 Decontamination Areas

The following procedures will be established for the decontamination of employees and their equipment which is contaminated with asbestos:

- Establish a decontamination area throughout the duration of work that is adjacent and connected to the regulated area.
- The decontamination area will include an impermeable drop cloth placed on the floor or horizontal working surface.
- The area must be of sufficient size as to accommodate equipment cleaning and personal protective equipment removal without spreading contamination beyond the area.
- Work clothing must be cleaned with a HEPA vacuum before it is removed.
- All equipment and surfaces of containers filled with ACM must be cleaned prior to removing them from the decontamination area.
- The Competent Person shall ensure that employees enter and exit the regulated area through the decontamination area.
- A hand wash station may also be employed in some cases on Class II work area decons.
- On Class 1 Friable NPE's, a 3-stage decontamination chamber will be attached to the NPE and all employees working inside NPE will utilize the decontamination requirements.

#### 11.0 ENGINEERING CONTROLS & WORK PRACTICES

#### 11.1 Engineering Controls

All feasible engineering controls will be used to the greatest extent possible to minimize worker exposure and environmental emissions from the very beginning of the project. Additional control measures may be necessary depending on the results of air monitoring once the project progresses.

Engineering controls and work methods that will be used to include but are not necessarily limited to the following:

- Wet Removal Methods
- Vacuums Equipped with a HEPA Filter. Filter must be certified to filter 99.97% of particles down to 0.3 microns and larger.
- Regulated Areas
- Negative Pressure Enclosures with manometer and viewing window that complies with OAR 340-248-0010(31) and OAR 340- 248-0270(8)(e)(E).
- Decontamination Areas
- Critical barriers
- HEPA filtered exhaust ventilation

#### 11.2 Site specific Work Practices

Friable ACMs (i.e., duct seam tape, floor leveling compound, fire doors, pipe fittings and insulation, boiler insulation) and any nonfriable ACMs that are rendered friable during abatement will be handled within a NPE unless otherwise specified in OAR 340-248-0270(8)(e)(F) or the NPE requirement has been waived by DEQ. All ACM in this section will be removed in

compliance with the asbestos work practice requirements in OAR 340-248-0270.

#### 11.2.1 Asbestos Duct Seam Tape

The removal of ACM duct seam tape will be performed in a regulated work area utilizing banner tape and poly drop sheeting. The duct seam tape will be sealed with spray glue and duct tape to metal ducts, the duct will be cut out where there is no ACM seam tape. This process will keep the ACM seam tape intact and sealed throughout the removal process. All workers will wear protective clothing, work boots, gloves as required, and a North® half-face air purifying respirator fitted with P-100 HEPA cartridges. A decontamination area will be established adjacent to the regulated area for personnel and equipment decontamination prior to exiting the work area.

If duct seam tape is removed from metal ducts, this work will be completed in a glove bag or inside a full NPE as per OAR 340-248-0270.

#### 11.2.2 Asbestos Louver Caulking

The removal of ACM louver caulking will be performed in a regulated work area utilizing banner tape and poly drop sheeting. Hand scraping and component procedures will be utilized during the removal process. All workers will wear protective clothing, work boots, gloves as required, and a North® half-face air purifying respirator fitted with P-100 HEPA cartridges. A decontamination area will be established adjacent to the regulated area for personnel and equipment decontamination prior to exiting the work area.

#### 11.2.3 Asbestos Electrical Backer Boards

The removal of ACM electrical backer boards will be performed in a regulated work area utilizing banner tape and poly drop sheeting. Component procedures will be utilized during the removal process. All workers will wear protective clothing, work boots, gloves as required, and a North® half-face air purifying respirator fitted with P-100 HEPA cartridges. A decontamination area will be established adjacent to the regulated area for personnel and equipment decontamination prior to exiting the work area.

#### 11.2.4 Asbestos Floor Tile

The removal of ACM floor tile will be performed in a negative pressure enclosure area utilizing 6 mil plastic, decons, and HEPA filtered air machines, manometer, and viewing windows. Mechanical (ride on floor scraper) and manual methods will be utilized during the removal process. All workers will wear protective clothing, work boots, gloves as required, and a PAPR. Respiratory protection may be downgraded if negative exposure monitoring demonstrates that half-face air purifying respirator fitted with P-100 HEPA cartridges is warranted.

#### 11.2.5 Asbestos Floor Mastic & Leveling Compound

The removal of ACM floor mastic & leveling compound will be performed in a regulated work area utilizing banner tape and poly drop sheeting. Mastic will be removed utilizing low odor

chemical mastic remover and/or self-contained hydro-blast machine. All workers will wear protective clothing, work boots, gloves as required, and a North® half-face air purifying respirator fitted with P-100 HEPA cartridges. A decontamination area will be established adjacent to the regulated area for personnel and equipment decontamination prior to exiting the work area.

#### 11.2.6 Black Wall Tar (Interior Elevator Rooms)

The removal of ACM black wall tar will be performed in a regulated work area utilizing banner tape. Chemical, self-contained hydro-blast, and manual methods will be utilized during the removal process. All workers will wear protective clothing, work boots, gloves as required, and a North® half-face air purifying respirator fitted with P-100 HEPA cartridges. A decontamination area will be established adjacent to the regulated area for personnel and equipment decontamination prior to exiting the work area.

#### 11.2.7 Fire Doors

The removal of ACM fire doors will be performed in a regulated work area utilizing banner tape and poly drop sheeting. Component procedures will be utilized during the removal process, doors penetrations will be sealed with poly and/or duct tape and properly labelled. All workers will wear protective clothing, work boots, gloves as required, and a North® half-face air purifying respirator fitted with P-100 HEPA cartridges. A decontamination area will be established adjacent to the regulated area for personnel and equipment decontamination prior to exiting the work area.

#### 11.2.8 Elevator Brake Shoes

The removal of ACM elevator brake shoes will be performed in a regulated work area utilizing banner tape and poly drop sheeting. Component procedures will be utilized during the removal process. All workers will wear protective clothing, work boots, gloves as required, and a North® half-face air purifying respirator fitted with P-100 HEPA cartridges. A decontamination area will be established adjacent to the regulated area for personnel and equipment decontamination prior to exiting the work area.

#### 11.2.9 Pipe Fittings Insulation

The removal of ACM pipe fittings will be performed in a regulated work area utilizing banner tape and poly drop sheeting. The straight run pipe insulation is non-ACM throughout the project, all ACM fittings will be wrapped with poly and/or duct tape, properly labelled, and pipe will be cut on either side of the ACM fittings. At no time will ACM fittings be removed from the pipe systems, only intact component removal methods will be utilized during the removal process. All workers will wear protective clothing, work boots, gloves as required, and a North® half-face air purifying respirator fitted with P-100 HEPA cartridges. A decontamination area will be established adjacent to the regulated area for personnel and equipment decontamination prior to exiting the work area.

#### 11.2.10 Boiler Breaching

The removal of ACM boiler breaching will be performed in a negative pressure enclosure area utilizing 6 mil plastic, decons, and HEPA filtered air machines, manometer, and viewing windows. Manual methods will be utilized during the removal process. All workers will wear protective clothing, work boots, gloves as required, and a PAPR respirator fitted with HEPA filter cartridges. A decontamination unit will be attached to the negative pressure containment for personnel and equipment decontamination prior to exiting the work area as per OAR 340-248-0270.

#### 11.2.11 Asphaltic Membrane on Exterior of Tunnel System

Per the asbestos survey and certified building inspector, this is a non-friable exempt material that will not be abated from the concrete substrate. The plan is to demarcate the work area with banner tape to identify the work zone and keep untrained individuals out. A closed cab excavator equipment with a cracking jaw will crack large sections of the walls/floors while being misted with water. Concrete with membrane will be placed into trucks for transportation to the proper Subtitle D landfill as an exempt material. PBS will have certified building inspector/IH perform visual assessments to confirm asphaltic membrane remains intact (non-friable) throughout the removal process. PBS will also perform perimeter air sampling to ensure that engineering controls and work practices are not causing fiber release. All workers will wear protective clothing, work boots, gloves as required, and a North® half-face air purifying respirator fitted with P-100 HEPA cartridges.

- On April 26, 2022, DEQ documenting concerns with regards to the proposed removal methods of this ACM and the ability to maintain the rule exemption per [OAR 340-248-0250(1)(e)] during loading/unloading of the concrete into trucks and transport of the ACM. It is the responsibility of the PBS, Contractor and/or NCES to ensure the ACM remains in an exempt condition. DEQ strongly recommends that transport trucks be covered prior to leaving the work site to prevent potential fiber release if the load shifts during transport.
- Transportation trucks will have the ability to cover loads prior to leaving the site if required or needed.

#### 12.0 SITE STANDARD OPERATING PROCEDURES (SOPs)

All personnel working on this project shall comply with the following rules and procedures:

- Always maintain professional conduct.
- Obey all warning and instructional signs posted at the site.
- No smoking, eating, drinking, chewing gum or tobacco, or any practice that increases the probability of hand-to-mouth transfer and ingestion of hazardous material(s).
- If lunch is to be eaten on site, it shall be done so within designated areas following proper decontamination.
- No matches or lighters in work zones.
- Wear the appropriate level of PPE.
- Workers shall not possess or use alcohol or drugs at the site or work at the site while under

- the influence of alcohol or drugs.
- Firearms, ammunition, fireworks, or explosives are prohibited.
- Climbing or standing on machinery, pipes, or ducts are prohibited unless authorized by the Contractor's Representative.
- Facial hair that interferes with a proper seal being created and maintained between the face and respirator is prohibited.
- Where appropriate, the "buddy system" shall be used. Hand signals will be established and be consistent among all workers.
- During abatement operations, each worker should consider himself a safety backup to his or her partner(s) and make all personnel aware of dangerous situations that may develop.
- Where appropriate, visual contact must be maintained between buddies on site.
- No unapproved work clothes or equipment will be allowed on site.
- No exchange of personal protective equipment will be allowed except in emergency situations involving a threat to health and safety.
- Procedures for leaving contaminated areas will be planned and reviewed prior to going on site.
- Proper decontamination procedures must be followed before leaving the site, unless medical emergencies dictate otherwise.
- All personnel must comply with the established safety procedures. Any staff member who
  does not comply with safety policy, as established by the Contractor's Representative or
  NCES' Competent Person will be immediately dismissed from the site.

#### 13.0 WASTE MANAGEMENT

#### 13.1 Regulated Asbestos Containing Material

#### 13.1.1 Handling & Staging

Asbestos waste from abatement activities will be staged onsite in a secure, lockable area or moved into a NCES lockable enclosed box truck or trailer until the waste can be transported to an approved landfill for disposal after the work is completed. Worker's packaging and handling waste will follow established respiratory procedures for handling asbestos waste. Packaged waste will not be dragged and will be lifted, carried, or transported in wheeled carts, trucks and or vans when moved from one area to another. Packaged waste will be placed, not thrown into containers, and be staged on 6-mil plastic.

Signage in accordance with NESHAP will be posted at the storage area and on vehicles used to transport asbestos containing waste material during loading and unloading.

#### 13.1.2 Waste Containing & Labeling

All regulated asbestos waste generated will be packaged in sealed leak tight containers and labeled in accordance with all applicable federal, state, and local regulations. A minimum of two layers of 6-mill plastic wraps or bags will be used to contain the asbestos waste which may be further contained in a fiber drum or box. The asbestos waste containers shall bear the following labels.

OSHA Hazard Communication Label:
DANGER
CONTAINS ASBESTOS FIBERS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
DO NOT BREATHE DUST
AVOID CREATING DUST

Asbestos Waste Owner
NAME, ADDRESS, PHONE NUMBER
Asbestos Waste Generator
NAME, ADDRESS, PHONE NUMBER
Department of Transportation Label:
RQ ASBESTOS, Class 9 Diamond, NA 2212 III

#### 13.1.3 Waste Transportation & Disposal

All asbestos waste generated will be disposed of at an EPA or State approved landfill transported in accordance with all applicable federal, state, and local regulations. All asbestos waste shall be collected and disposed of in sealed leak tight containers and transported in enclosed cargo-vans or covered containers in accordance with all applicable local, state, and federal regulations. ACM will be disposed of throughout the project.

All asbestos waste shipments shall be documented on assigned Asbestos Waste Shipment Record (AWSR) that tracks dates, quantities of removal and number of packages. The original AWSR signed by the disposal facility will be returned to the Owner or Owner's Representative within 30 calendar days of the date the waste was accepted by the initial transporter. NCES shall keep a copy of all disposal documents. The designated transporter(s) and landfills are as follows:

FRIABLE & NON-FRIABLE WASTE	DISPOSAL LANDFILL		
TRANSPORTER			
NCES	Waste Connections		
2112 E 26 <sup>th</sup> Street	Wasco County Landfill		
Vancouver, WA 98661	2550 Steele Road		
(360) 699-4015	The Dalles, OR 97058		
Or Waste Connections			

Offsite disposal will be in an authorized landfill and in accordance with all applicable federal, state, and local regulations. During the loading and unloading of affected waste into a predesignated area, asbestos warning signs will be affixed to the vehicles.

#### 13.3 Wastewater

When applicable, asbestos contaminated water from hand-wash facilities, decontamination and/or abatement (cleaning) inside work areas will be disposed of in accordance with all applicable federal, state, and local regulations and/or will be filtered through a 5-micron water filter prior to discharge into a Publicly Owned Treatment Works (POTW) or sewer system.

If a filter unit is not available at the work location, the discharge of water is not permitted, or sewer access not available; then the contaminated water will be put into leak-tight drums and transported to a location with filtering equipment and sewer access.

We don't anticipate any excess water runoff outside of the regulated area during asbestos abatement activities. We have engineering controls in place and are using a misting application for wetting ACM.

#### 14.0 **EMERGENCY RESPONSE**

#### 14.1 Hospital

Nearest

Clinic: Providence St. Vincent Medical Center (9205 SW Barnes Road, Portland)

Urgent

Center: Providence St. Vincent Medical Center (9205 SW Barnes Road, Portland) A map showing the location of the project and each of the emergency care locations described above is included as an appendix.

#### 14.2 **Emergency Procedures - Immediate**

- Remove injured party from contaminated or other unsafe zone without incurring additional injuries, if possible.
- Apply emergency first aid to ensure breathing and reduce immediate threat to life.
- Contact Competent Person and facility EMS personnel.
- If any contaminated material enters the eyes, wash immediately with clean water for 15 minutes.

#### 14.3 **Emergency Procedures - Secondary**

- Transport to hospital if possible; otherwise call 4333 from any phone on site for Emergency Services. If no phone contact 911.
- Notify Project Manager and other key personnel as listed in this AHAP.
- Fill out Incident / Accident report.

#### 14.4 **General First Aid**

In all emergencies, document action taken and notify Competent Person, Project Manager, and Industrial Hygienist of occurrence of an emergency and action taken.

Skin Remove contaminated clothing immediately, wash with soap and water.

Remove to fresh air. Where necessary, call emergency medical help Inhalation

(ambulance, hospital, police) and follow medical emergency help

procedures.

Flush with eyewash or water at least 15 minutes. Follow emergency medical Eye Contact

help procedures, if indicated. Contaminants may be absorbed through the

eyes.

Ingestion Obtain medical help if indicated.

Injuries Administer first aid if qualified. Follow emergency medical procedures. Medical emergencies take precedence over decontamination.

#### 14.5 First Aid Kit

A general first aid kit meeting OSHA guidelines shall be kept on the site at all times. The Competent Person will ensure that the first aid kit is fully stocked at the start of the project.

#### 14.6 Emergency Eye Wash / Shower

Hazardous chemicals may be encountered at this site. An eye wash station meeting ANSI Z358.1-2014 for Emergency Eyewash and Shower Equipment and having at least 15 minutes of flowing sterile water for purposes of flushing foreign substances from the eyes, shall be located and available on the site at all times.

#### **14.7** Fires

Portable fire extinguishers will be placed in each truck and at each work site where a fire hazards may exist. All jobsite personnel will be trained in their proper use as well as their location. Portable fire extinguishers will be used to extinguish small, localized fires only. Large fires that cannot be extinguished with this equipment will necessitate evacuation of the burning structure or jobsite. The first person to arrive at a fire scene will determine the magnitude of the fire hazard and either attempt to extinguish the fire with a fire extinguisher or initiate emergency evacuation procedures. The Competent Person will be notified immediately of all fire events and coordinate subsequent firefighting efforts.

#### 15.0 SITE CONTROL MEASURES

The following section defines measures and procedures for maintaining site control. Site control is an essential component in the implementation of the AHAP.

#### 15.1 Regulated Area Boundaries

Regulated Area Boundaries will be established for all abatement areas. Where possible, the boundary will be a minimum of a 40 feet radius around the abatement area. Barrier tape and warning signs will be used to identify Regulated Area Boundaries. Entry to the regulated areas will be restricted to only those people with prior clearance and designated representatives who have a current Asbestos Abatement Certification card from the State of Oregon.

The established boundary will remain in effect until associated abatement activities have been completed within the demarked area. A log sheet will be maintained on site and everyone who enters the regulated work area must record their name, affiliation, time in and time out for each entry.

#### 15.2 Communication Between Asbestos Abatement Personnel

Communications between the abatement work area and the job site (trailer/personnel) will be maintained by cellular phones or radios. Any breach of the regulated areas will be reported immediately to the Competent Person and then to the Owner's Representative.

#### 15.3 Communication of Asbestos Work on Multi-Employer Worksites

Anytime work requires the establishment of a regulated area, NCES or the Owner Representative shall inform other employers on the site of the nature of the asbestos abatement work to include the existence of, and requirements pertaining to, regulated areas and the measures taken to ensure that employees of such other employers are not exposed to asbestos.

#### 16.0 PRE-TASK BRIEFINGS

The Competent Person will conduct Pre-Task Briefings with employees prior to site entry and before initiation of abatement operations to ensure that employees are apprised of the AHAP and will include as a minimum:

- Emergency information including emergency phone numbers and location of nearest hospital, telephone, water, and fire extinguishers.
- Emergency Action Procedures.
- Health effects of the hazards identified or suspected to be on the site.
- Personal protective equipment requirements.
- Use, care, maintenance, and fitting of personal protective equipment including respirators, as necessary.
- Decontamination procedures, as necessary.
- Accepted practices for entry, exit, and activities within specified areas of the site including limitation on eating, drinking, and smoking within the regulated areas.
- Buddy system review, as necessary.
- Review job assignments, lines of authority, and communication procedures.
- Medical surveillance requirements.
- Outline site security and site control.
- Point out safe places of refuge in an emergency.
- Outline emergency evacuation routes and procedures.

#### 17.0 TRAINING

#### 17.1 Previous Training

Prior to gaining access to the job site and work involving potential exposure to asbestos and/or other hazardous materials, and annually thereafter, all individuals must be trained in the hazards of asbestos and other potentially hazardous materials), applicable regulatory requirements, the

safety procedures, and requirements of this AHAP, and all environmental regulations including those for the proper handling and management of waste.

All personnel performing asbestos abatement work will hold current Washington State Asbestos Worker and/or Supervisor certifications. All work will be conducted by or under the supervision of a certified asbestos supervisor. The site supervisor will be trained in all aspects of asbestos removal and handling, including set up and maintenance of engineering controls, removal and handling of asbestos containing materials, proper waste packaging and manifesting of ACM materials, trained to identify other potential asbestos containing materials should they be encountered, and other practices for reducing the hazard.

The following is a summary of the topics that would be covered in this training:

- The health effects of asbestos exposure
- Respiratory protection and use
- How to identify asbestos containing materials
- How to identify asbestos hazards in their workplace (i.e., contaminated materials or spills)
- How and where to report any asbestos hazards they find
- Use of Personal Protective Equipment (PPE)
- Work practices by which the employee can minimize risks from hazards
- Safe use of engineering controls and equipment on the site
- Medical surveillance requirements

All NCES personnel will have also had prior training on the NCES APP HAZCOM program. The HAZCOM explains the safe use of hazardous chemicals, recognition or identification of the chemicals, routes of exposure, symptoms of exposure, and safe work practices or PPE requirements, prior to use of the chemicals or materials.

#### 17.2 Safety Meetings & Site-Specific Training

Site workers will be given tailgate safety meeting by the Competent Person daily and prior to the start of new work activities. A copy of the tailgate safety meeting will be kept in the onsite project file. Any special on-site training on equipment and procedures unique to this job site will be performed as required. This training will include COVID 19.

#### 18.0 RECORDKEEPING

#### **18.1** Project Documents

The following types of records will be generated and maintained as a result of this project and for compliance with OSHA & OR DEQ regulations:

• Asbestos abatement project notifications, both friable and nonfriable along with all subsequent revisions.

- Asbestos survey reports (copy of reports will be readily available onsite)
- Asbestos removal records
- Asbestos waste shipment log/report and completed waste manifests.
- Final air clearance results (must be submitted to OR DEQ within 30 days)
- Medical exam records
- Clearance for respirator use certification
- Medical removal records (if applicable)
- Air sampling results
- Certification of training
- Inspections for proper use and maintenance of respirators
- Compliance inspection reports by Competent Person

These records will be maintained by NCES for each employee for at least 30 years beyond employment termination, or 30 years total, whichever is greater. Other non-individual records will be maintained indefinitely, but no less than 10 years beyond the existence of the Corporation. In the event the contractor ceases to do business, the records will be transferred to its successor company, who will retain the records for the remainder of the specified duration.

#### 18.2 Close Out Documentation

At the completion of the work NCES will produce a final closeout report, this will include all sample analysis and disposal data generated during the project.

# APPENDIX A HOSPITAL ROUTES

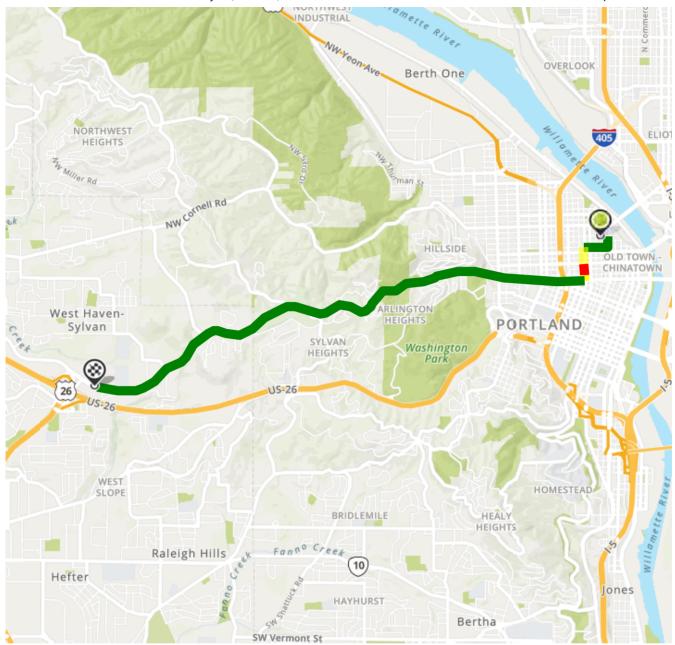
## YOUR TRIP TO:

Providence St. Vincent Medical Center

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-	Trip time based on traffic conditions as of 7:17 AM on April 6,  2022. Current Traffic: Moderate  Print a full health report of your vehicle diagnostics (800) 906			
	Start of next leg of route			
	1. Start out going south on NW Broadway toward NW Ho	yt St.		
	Then 0.09 miles	0.09 total miles		
_	2. Turn right onto NW Hoyt St.			
Ц	Then 0.22 miles			
	THEN 0.22 TIMES	0.51 total filles		
П	3. Turn left onto NW 11th Ave.			
_	NW 11th Ave is just past NW 10th Ave.			
	If you reach NW 12th Ave you've gone a little too far.			
	Then 0.30 miles			
	Then 6.66 miles	0.00 total filles		
П	4. Turn right onto W Burnside St.			
	W Burnside St is just past NW Couch St.			
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		2.04 total fillies		
	5. W Burnside St becomes W Burnside Rd.			
	Then 1.90 miles	3.94 total miles		
п	6. W Burnside Rd becomes SW Barnes Rd.			
Ц	Then 1.52 miles	5.46 total miles		
_		3.40 total filles		
孌	7. Providence St. Vincent Medical Center, 9205 SW Barn	es Rd, Portland, OR,		
	9205 SW BARNES RD.  If you reach St Vincent Hospital Rd you've gone a little too t	iar		
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Use of directions and maps is subject to our <u>Terms of Use</u>. We don't guarantee accuracy, route conditions or usability. You assume all risk of use.



## APPENDIX B PLAN ADDENDUM LOG

#### AHAP ADDENDUM LOG

#### USPS PROCESSING FACILITY - ACM ABATEMENT

	USPS PROCESSING FACILITY - ACM ABATEMENT				
Date	Rev. No.	Revisions	Approval		

## APPENDIX C PLAN ACKNOWLEDGMENT

## Acknowledgment Roster Read and Agreed To Follow ASBESTOS HAZARD ABATEMENT PLAN **USPS PROCESSING FACILITY** 715 NW Hoyt St., Portland, OR 97209

Date:	Name (Please Print)	Employee ID Number
	_	

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# APPENDIX D ABATEMENT CERTIFICATION DOCUMENTS

## OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

NAME

## Certified Supervisor for Asbestos Abatement Projects



Wayne Gardner

CERTIFICATE NO.

s 16092
TRAINING COURSE DATES

13-17Sep21

EXPIRATION DATE

17Sep22

17Sep21

TRAINER, ADDRESS AND TELEPHONE NO.

Asbestos Training Project
Workplace Resources, Inc.
PO Box 22388, Milmankis, OR 97369
4160 SE International Way, Ste D106
Milwankie, OR 97223 503-233-7707

The person assigned this certificate has completed the required training for asbestos certification and is certified by the Department of Environmental Quality under OAR Chapter 340, Division 248 and under TSCA Title II.

NAME



## JUAN P. URIBE MEJIA CERTIFICATE NO. EXPIRATION DATE

s 15075

5/04/2023

MAY 4, 2022

5/04/2022

TRAINER, ADDRESS AND TELEPHONE NO.

Oregon and S. Idaho Laborers Employers Training Trust (OSILETT)

17242 NE Sacramento Street Portland, OR 97230

Phone: 541-745-5513
The person assigned this certificate has completed the required training for asbestos certification and is certified by the Department of Environmental Quality under OAR Chapter 340, Division 248 and under TSCA Title II.

#### NOTICE

WHEN YOU ARE WORKING ON AN ASBESTOS RE-MOVAL OR ENCAPSULATION PROJECT, YOU MUST BE PREPARED AT ANY TIME TO SHOW THIS CARD TO A DEQ INSPECTOR. YOU CANNOT LET ANYONE ELSE USE THIS CARD. YOU MUST TAKE AN ANNUAL REFRESHER COURSE IN ORDER TO RENEW THIS CARD.

NOT VALID UNTIL SIGNED





### RAMON ORDONEZ REYES CERTIFICATE NO.

S 15065 10/22/2022 THANKING COURSE DATES EXAMINATION DATE 10/22/2021

TRAINER, ADDRESS AND TELEPHONE NO.
Oregon and S. Idaho Laborers Employers
Training Trust (OSILETT)
17242 NE Sacramento Street Portland, OR 97230
Phone: 541-745-5513
The person assigned this certification and is certified by the Department of Environmental Quality under OAR
Chapter 340, Division 248 and under TSCA Title II.

## OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY Certified Supervisor for Asbestos Abatement Projects Jacob Tiscareno

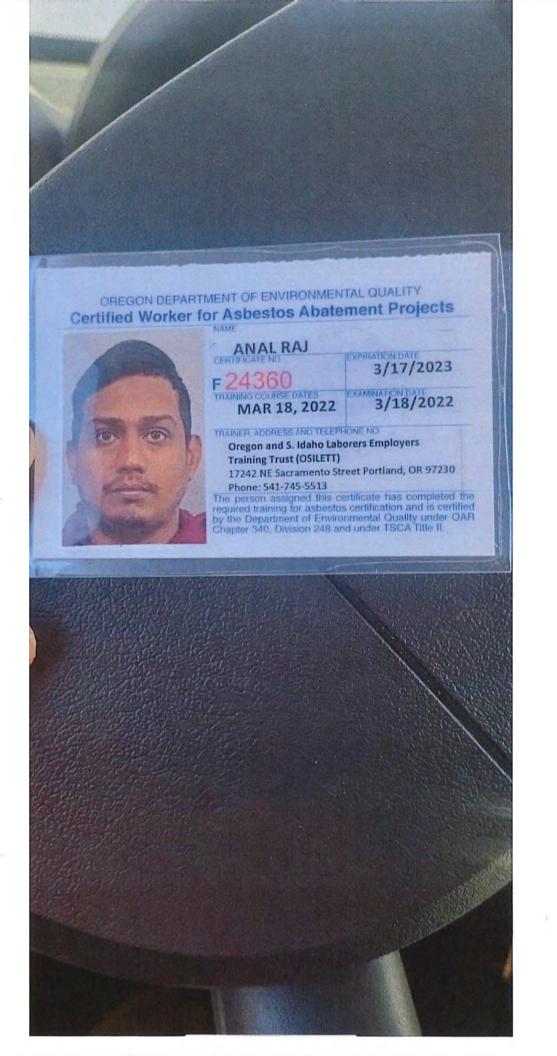
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OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
Certified Worker for Asbestos Abatement Projects

Alejandro Cristobal H.

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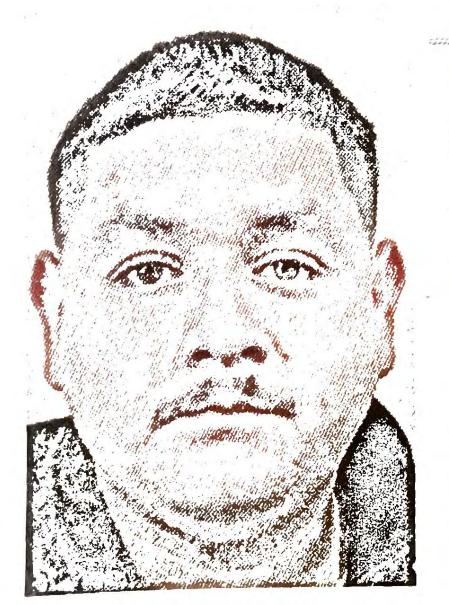
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### OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

## Certified Worker for Asbestos Abatement Projects

NAME



CERTIFICATE NO. IEXPIRATION DATE

F24708

4/29/2023

APRIL 25-29, 2022 EXAMPLE 19/2022

TRAINER, ADDRESS AND TELEPHONE NO.

Oregon and S. Idaho Laborers Employers Training Trust (OSILETT)

17242 NE Sacramento Street Portland, OR 97230

Phone: 541-745-5513

The person assigned this certificate has completed the required training for asbestos certification and is certified by the Department of Environmental Quality under OAR Chapter 340, Division 248 and under TSCA Title II.

Bastidas Camilo

F 24920 4/30/2023

4/27-30/2022 4/30/2022

Asbests Abstement Certification
2909 Southeast 136\* Avenue
Portland, OR, 97236
503-760-7366
The person assigned this certificate has completed the required training for asbestos certificate nad is certified by the Department of Environmental Outlify under OAR Chapter 340, Division 246 and under TSCA Title II.

#### NOTICE

WHEN YOU ARE WORKING ON AN ASBESTOS RE-MOVAL OR ENCAPSULATION PROJECT, YOU MUST BE PREPARED AT ANY TIME TO SHOW THIS CARD TO A DEQ INSPECTOR. YOU CANNOT LET ANYONE ELSE USE THIS CARD. YOU MUST TAKE AN ANNUAL REFRESHER COURSE IN ORDER TO RENEW THIS CARD.

SIGNATURI

Cote B. Ellis

F 24998 TRAINING COURSE DATE:

3Jun22

11Jun23 3Jun22

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NOT VALID UNTIL SIGNED



David A. Estrada

F24076 5Jun22

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#### Elionahi De la Cruz

CENTRICATE NO. F 24669

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TRAINER, ADDRESS AND TELEPHONE IND.

Abbettos Abstement Certification
2909 Southeast 136\* Avenue
Portland, OR, 97236
503-760-7366
The person assigned this certificate has completed lihe required Iralining for assistance critification and is certified by the Department of Environmental Quality under OAR Chapter 340, Division 248 and under TSGA Title II.



Elmer Raya

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Enrique D. Estrada

F24075 THAINING COURSE DATES

5Jun22 5Jun21

5Jun21
THAINER, ADDRESS AND TELET

Asbatos Tralaing Project
Workplace Resources, Inc.
PO Box 2238, Milwankie, OR 97269
4160 SB International Way, Ste D106
Milwankie, OR 97222 S03-232-7707

The person assigned this certificate has completed the required training for asbestos certification and is certified by the Department of Environmental Could the Chapter 340, Division 248 and under TSCA Title II.

#### NOTICE

WHEN YOU ARE WORKING ON AN ASBESTOS RE-MOVAL OR ENCAPSULATION PROJECT, YOU MUST BE PREPARED AT ANY TIME TO SHOW THIS CARD. TO A DEQ INSPECTOR, YOU CANNOT LET ANYONE ELSE USE THIS CARD. YOU MUST TAKE AN ANNUAL REFRESHER COURSE IN ORDER TO RENEW THIS CARD.

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Fernando Lopez

F 24166
TRAINING COURSE DATE

6Nov22

6Nov21

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AINER, ADDRESS AND TELEPHONE NO.

Asbeston Training Project
Workplace Beautones, Inc.
PO Star 20188, Milesatics, CR 97249
4160 SE Investational Way, Sc 1704
Milesatic, CR 97249
524, 2022, 2022

The person assigned this certificate has completed the required training for asbestos certification and is certified by the Department of Environmental Quality under OAF Chapter 340 Division 248 and under TSC Title III.

#### NOTICE

WHEN YOU ARE WORKING ON AN ASBESTOS RE-MOVAL OR ENCAPSULATION PROJECT, YOU MUST BE PREPARED AT ANY TIME TO SHOW THIS CARD TO A DEQ INSPECTOR. YOU CANNOT LET ANYONE ELSE USE THIS CARD. YOU MUST TAKE AN ANNUAL REFRESHER COURSE IN ORDER TO RENEW THIS CARD.

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Frankie Rolon

F 24705 TRAINING COURSE DATES

5/12/2023

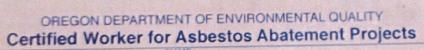
5/9-12/2022 5/12/2022

Asbestos Abstement Certification
2909 Southeast 136<sup>th</sup> Avenue
Portland, OR, 97236
503-760-7366
The person assigned this certificate has completed the
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NOT VALID UNTIL SIGNED



## GABRIEL CASTREJON

10/15/2022

10/15/2021

OCT 15, 2021

TRAINER, ADDRESS AND TELEPHONE NO.

Oregon and S. Idaho Laborers Employers Training Trust (OSILETT)

17242 NE Sacramento Street Portland, OR 97230

Phone: 541-745-5513

The person assigned this certificate has completed the required training for asbestos certification and is certified by the Department of Environmental Quality under OAR Chapter 340, Division 248 and under TSCA Title II.



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Oregon and S. Idaho Laborers Employers

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Training Trust (OSILETT)
17242 NE Secremento Street Portland, OR 97230
Phone: 541-745-5513
The person assigned this certification has completed the equired training for exhabitor certification and is certified by the Department of Environmental Quality under OAFI Chapter 340, Olvision 248 and under 180A Title II



Ignacio Caro

F24216

14Aug22

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TRAINER ADDRESS AND TELEPHONE NO.

Adhestor Training Project
Weetphess Zascurens, Les.
PO Ilon 23585, Mithen Malls, Oil. 97269
4160 Est international Way, Ste D106
Mitheautis, OR 97223 503-933-7107
The person assigned this certificate has completed the
required training for asbestos certification and is certified
by the Department of Environmental Ouality under OAR
Chapter 340, Division 248 and under TSCA Title II.

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JESUS VALENZUELA ORTEGA

MAY 23-27, 2022

5/27/2023 5/27/2022

TRABLER, ADDRESS AND TELEPHONE NO.

Oregon and S. Idaho Laborers Employers

Training Trust (OSILETT)

Training Trust (OSILETT)
17242 NE Sacramento Street Portland, OR 97230
Phone: 541-745-5513
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Jorge Caro

F25051 6/1/1/2023

6/8-11/2022 6/11/2022

Asbestos Abatement Certification
2009 Southeast 136th Avenue
Pontland, OR. 97236
503-760-7366
The person assigned this certificate has completed the
required training for asbestos certification and is certified
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JOSE A VARGAS



CEHTIFICATE NO.

4/9/2023

Asbestos Abatement Certification 2909 Southeast 136<sup>th</sup> Avenue Portland, OR. 97236 503-760-7366

The person assigned this certificate has completed the required training for asbestos certification and is certified by the Department of Environmental Quality under OAR Chapter 340, Division 248 and under TSCA Tille II.

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Jose A. Reyes CERTIFICATE NO

s 15698 TRAINING COURSE DATES

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TRANER, ADDRESS AND TELEPHONE NO.

Ashector Transing Project
Workpiece Securities, 2019
P. Box. 12385, Mithraukie, OR 97269
4100 SE International Way, Ste D106
Missaukie, OR 97222 Sch 333-7707
The person assigned this certificate has completed the required training for ashestos certification and is certified by the Department of Envision restriction and Chapter 340, Division 248 and under TSCA Title II.

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Juan Arias

F24607

21Apr23

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The person assigned this certificate has completed the required training for absolute certificate by the Department of Environmental Quality under OAR Chapter 340, Division 248 and under TSCA Title II.

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Luis D. Fonseca Arias

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# OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY Certified Supervisor for Asbestos Abatement Projects Maliek M.S. Genwright CERTIFICATE NO. EXPERATION DATE



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Workplace Residency, far.

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Miscolar, Co. 17222 503-328-7707

The person assigned links certificate has completed the required training for asbestos certification and its certificate by the Department of Environmental Cuality under OAR Chapter 340, Division 248 and under TSCA Title II.

MAURICIO CELIS Z



CHITIPISATE NO. F 24695

OWNER DATE 4/9/2023

4/6-9/2022 4/9/2022 TRAINER, AUDITES AND TELEPHONE NO.

Assetion Abatement Certification
2909 Southeast 136<sup>th</sup> Avenue
Portland, OR, 97236
The person assetined this certificate has completed the required training for asbestos certification and is certified by the Department of Environmental Quality under OAR Chapter 340, Division 248 and under TSCA Title II.

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Miguel A. Raya

25Jun23

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TRAINER ADDRESS AND TELEPHONE NO

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MIGUEL MARTINEZ RODRIGUEZ 6/14/2023

TRAINER, ADDRESS AND TELEPHONE NO.

Oregon and S. Idaho Laborers Employers
Training Trust (OSILETT)
17242 NE Sacramento Street Portland, OR 97230

Phone: 541-745-5513
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#### Moises Fonseca

F25171

7/2/2023

6/29-7/2/2022 7/2/2022 TRAINER, ADDRESS AND TELEPHONE NO.

Asbestos Abatement Certification 2909 Southeast 136th Avenue Portland, OR. 97236 503-760-7366

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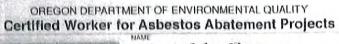
4Jun22

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Antonomous Tendering Project Universitions Measuremen, later PO Jose (M. Selburaldo, Cit. 97269 4160 SE International Way, Ste Nick Milmarkin, Cit. 97222 500-202-7707

This parties resigned this coefficies has completed the risquired training for asbeiston certification and is certified by the Department of Environmental Quality under GAR. Chapter 345. Division 248 and under TSCA 78to 8.







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EXPINATION DATE

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4160 St. Large Miner



Roberto Orozco

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25Jan23 AMINATION DATE 4Dec21

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The person assigned this certificate has completed the required training for asbestos certification and is certifie by the Department of Environmental Quality under OAI Chapter 340. Division 248 and under ISCA Title II.

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Orozco Barata



Rodrigo Garcia

s 16306 TRAINING COURSE DATES

25Mar23 EXAMINATION DATE 25Mar22

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Workplane Russgreen, Lee.

The person assigned this certificate has completed the required training for asbestos certification and is certified by the Department of Environmental Quality under OAR Checkes and middle of the control of the contr

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Vidal R. Alvarez

CERTIFICATE NO, EXPRANOS DATE

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Asbestos Abstement Certification
2909 Southeast 136th Avenue
Portland, OR, 97236
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3/17/2023

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TRAINER, ADDRESS AND TELEPHONE NO.

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Oregon and S. Idahe Laborers Employers
Training Trust (OSILETT)
17242 NE Sacramento Street Portland, OR 97230
Phone: 541-745-5513.
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Avendano Yonathan

F 24919 4/30/2023

4/27-30/2022 4/30/2022

Asbestos Abafement Certification
2909 Southeast 136® Avenue
Portland, OR. 97236
503-760-7366
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