

2014 JUN 27 PM 3:56

Karen Gorman
Deputy Chief, Disclosure Unit
1730 M. Street, N.W., Suite 218
Washington, D.C. 20036-4505

June 25, 2014

Mr. Gorman,

ON RECOMMENDATIONS that Medical Center should do: I noted some concerns still are happening in this facility and with me.

- 1) I am still working removing ceiling tiles in which it was documented in the Executive Summary date 2009 that all ceiling tiles should to be handled as it has ACM due to the fact that not all interstitial space have been cleaned. I have attached some work orders under my name that I am still removing ceiling tiles. We continue to do lots of ACM in some areas especially the ceiling tiles on a daily routine and lot of walls that are still ACM. Orders are given to us by our supervisor or the foreman whenever our supervisor is out. Our supervisor and foreman are aware of where they send us. I am sending you a couple of orders to proof that their names are on it. **see attachment (a)**
- 2) The Medical Center has failed me on this area by denying that I was or have the Asbestos Pleural thickening. The Chief of Staff, Dr. Flynn and Assistant Chief of Staff, Dr. Leuschen said "I was cured" and called it a "fatty tissue". It is on page 10 on your report that Dr. Pierce saw me and confirmed what doctors in San Antonio, Texas tell me that Asbestos related diseases are not curable and require close monitoring. The VA knew about it in x-rays taken in 2007, 2009, 2010 and 2011 and denied it completely. Despite what Department of Labor acceptance of my claim and sending me to four private doctors who confirmed the diagnosis through CT scans and x-rays as Asbestos related disease. It was also mentioned that it happened at Audie L. Murphy VA hospital in San Antonio, Texas. On the conclusion, if the Center managers didn't know about this, how come they were at the end trying to talk me to get another x-rays and C-scan? They wanted to come out with another final negative version or interpretation that I was okay. In reality I am or/was not, cause per their orders and Dr.

Pierce, I retook another CT scan at Audie Murphy and two other CT scan on the outside of the Audie Murphy VA hospital. The results at Audie Murphy stated I was healed and the other doctors on the outside said it was positive for Asbestos plaque and even reordered to take another one by. Dr. Fornos, Pulmonologist specialist disease. He was concern and wanted to make sure that it wasn't getting worse. He informed me in the future that I will keep going back to him and he will keep monitoring me and also gave me an inhalator to use.

- 3) Yes, they supply us with a coded blueprint of the Medical Center but the samples of the survey were done according to every reliable source 80% was done on the new constructed areas and not thoroughly done as it should have been done. One example is the interstitial on all floors have not been worked on except only a very few areas. The coded map even tells you that the interstitials have not been touched therefore; as our personnel contractors are working in construction or remodeling areas. As they work on the areas and through the vibration of equipment; the walls are vibrating causing the insulation and mastic to release fibers. Since the hospital was built around 1971, its deteriorating and friable fibers fall all over the ceiling tiles. By Tri-Country Environment Inc. Consultant and OSHA and Aleo-Clean Environments Inc. all tiles must be done only by certified Asbestos workers including the now areas. **See attachment (b).**
- 4) As you can see by some of the work-orders sent many areas with ACM are still being worked on by M&O employees. One person being the supervisor cannot be throughout the Medical Center Area at one time thus it opens the door for M&O employees to go and do some of the work such as removing ceiling tiles or working on ACM walls. The AAT supervisor and foreman know that I questioned my supervisor about the assignment and his answer was, "You know my bosses want everything done". I have confronted some of my coworkers and they tell me, "I do what my supervisor tells me". I do not tell them anything anymore and they know lots of times that it is ACM but still do it anyway. **See attachment (a)**
- 5) They just started to do it in June for EMS personal. According to a supervisor does not want his name because of fear retaliation that the buffers use in all hallways with vinyl tile (ACM) are the wrong buffers with too much RPM and create lots of dusts with friable fibers.

- 6) Many work orders are assigned to the ACM crew (3) people and the AAT supervisor. That is too much work for a few personal that go and do abatement in Kerrville VA Hospital too. That's why to me some work that is ACM is done by M&O personal but the supervisor knows it. None of my coworkers will speak up for fear of retaliation.
- 7) Many M&O personal complain about the lack of Personal Protective Equipment. No one else has any PPE except the painters but they won't speak up.
- 8) This has started doing.
- 9) Dr. Pinter, Occupational doctor and not a pulmonary doctor or specialist. He looked at my chart and didn't say anything but scribbled over abnormal and put normal. He said, "Nothing is wrong with you". I told Dr. Leuschen, Assistant Chief of Staff and he kind of laughed it off and said, "Dr. Pinter has funny ways of doing things". The Assistant Chief of Staff also agreed that nothing was wrong with me and also in the meeting was Sylvia Ramon, Executive Vice President of Local 3511.
- 10) Many supervisors have their favorite's employees. They hang around together in and off the hospital like the old saying go 'You scratch my back and I'll scratch your back'. In this case that happens a lot in this hospital. Many employees try to get away with a lot of stuff in for favors in return. They know it's wrong on some or I should say many jobs perform they know it is ACM but for favorite favors they go and do it anyway. I see that and employees try to avoid me or go around me where they're going because they know I will write it down and they don't back me up or speak up.
- 11) Contractors or the AAT supervisor when sealing off an area, do not say what's going on whenever they are working in an area to working employees. They just say, "We are going to remodel the area or do some construction". They put and seal the area until they are going to start abatement. They put the sign tape "Caution Asbestos— Do not enter--May cause cancer and lung disease" at the entrance. People read the sign and go around the area. Many times I hear people and workers say, "I didn't know there was Asbestos in this building". Obviously those next door were told nothing but that we are going to remodel and make it look better and bigger, etc.
- 12) Haven't heard too much about this so I cannot comment too much on these matters. I will just use protection for myself.
- 13) The COR, Engineer Personal or Safety Officer. That is an office and business matter they discuss probably the building or rules and

regulation in their offices. I only see the sampling person and the AAT supervisor on the area where many are being sampled. I have never seen the Safety Officer.

- 14) Ongoing.
- 15) I have been taken off the Medical Surveillance since Dr. Pinter, Occupational Health, Dr. Flynn, Chief of Staff and Dr. Leuschen, assistant Chief of Staff, said I was **cured**. This is ongoing to me because my personal doctor said and documented that I still have Asbestos Plaque.
- 16) **Attachment (c)**

D1-12-3232

6/24/2014
Date

ATTACHMENT (a)

WORK ORDER #

- 1) PRIMARY EMPL: ;
- 2) REQ DATE: MAR 14,2014@08:29
- 3) REQ MODE: COMPUTER
- 4) LOCATION: G011-AMH-SA
- 5) BED #:
- 6) STATUS: COMPLETED
- 7) TASK DESC: REPLACE CEILING TILES
- 8) CONTACT:
- 9) PHONE:
- 10) ENTERED BY:
- 11) SHOP: CARPENTRY
- 12) DATE ASSIGNED: 03/14/14
- 13) PRIORITY: AVERAGE
- 14) EQUIP ID#:
- 15) LOCAL ID:
- 16) EQUIP CAT:
- 17) CONDITION:
- 18) MFGR:
- 19) MODEL:
- 20) SERIAL #:
- 21) OWNER/DEPT: ENGINEERING SERVICE
- 22) PM #:
- 23) PARTS ORDER:
- 24) WORK ACTION: G1
- 25) WORK CTR: 54181/CEILINGS,REPAIR
- 26) TOTAL HOURS: 4
- 27) TOTAL MATERIAL COST: 80.00
- 28) TOTAL LABOR COST: 37.44
- 29) VENDOR SERVICE COST: 0
- 30) *ASSIGNED TECH*
- 31) DATE COMPLETE: MAR 14,2014
- #1: HRS: 1 SHOP: CARPENTRY
- #2: HRS: 1 SHOP: CARPENTRY
- #3: HRS: 1 SHOP: CARPENTRY
- #4: HRS: 1 SHOP: CARPENTRY
- 32) WORK PERFORMED: INSTALLED BARRIER .REPLACED DAMAGED CEILING TILES.
- 33) COMMENTS:

WORK ORDER #

- 1) PRIMARY EMPL:
 - 3) REQ MODE: COMPUTER
 - 5) BED #:
 - 7) TASK DESC: replace ceiling tile
 - 8) CONTACT:
 - 10) ENTERED BY:
 - 12) DATE ASSIGNED: 03/14/14
 - 14) EQUIP ID#:
 - 16) EQUIP CAT:
 - 18) MFGR:
 - 19) MODEL:
 - 21) OWNER/DEPT:
 - 23) PARTS ORDER:
 - 25) WORK CTR:
 - 26) TOTAL HOURS: .5
 - 28) TOTAL LABOR COST: 0.50
 - 30) *ASSIGNED TECH*
#1: -- HRS: .5 SHOP: CARPENTRY
 - 32) WORK PERFORMED: WORK COMPLETED ON W/O :
 - 33) COMMENTS:
- 2) REQ DATE: MAR 14,2014@08:57
 - 4) LOCATION: G011-AMH-SA
 - 6) STATUS: COMPLETED
 - 9) PHONE:
 - 11) SHOP: CARPENTRY
 - 13) PRIORITY: AVERAGE
 - 15) LOCAL ID:
 - 17) CONDITION:
 - 20) SERIAL #:
 - 22) PM #:
 - 24) WORK ACTION:
 - 27) TOTAL MATERIAL COST:
 - 29) VENDOR SERVICE COST: 0
 - 31) DATE COMPLETE: MAR 14,2014

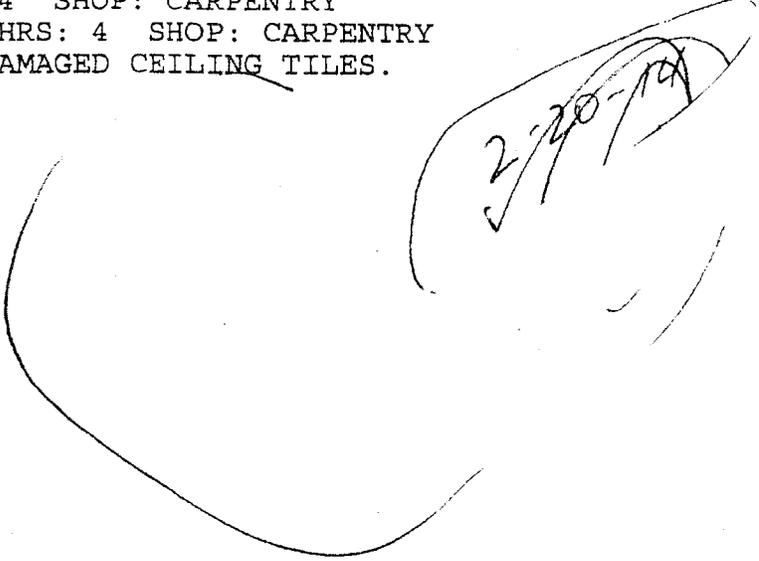
WORK ORDER #	(Original #:
1) PRIMARY EMPL:	2) REQ DATE: MAR 14,2014@08:29
3) REQ MODE: COMPUTER	4) LOCATION: G011-AMH-SA
5) BED #:	6) STATUS: COMPLETED
7) TASK DESC: REPLACE CEILING TILES	
8) CONTACT:	9) PHONE:
10) ENTERED BY:	11) SHOP: CARPENTRY
12) DATE ASSIGNED: 03/14/14	13) PRIORITY: AVERAGE
14) EQUIP ID#:	15) LOCAL ID:
16) EQUIP CAT:	17) CONDITION:
18) MFGR:	
19) MODEL:	20) SERIAL #:
21) OWNER/DEPT: ENGINEERING SERVICE	22) PM #:
23) PARTS ORDER:	24) WORK ACTION: G1
25) WORK CTR: 54181/CEILINGS,REPAIR	
26) TOTAL HOURS: 4	27) TOTAL MATERIAL COST: 80.00
28) TOTAL LABOR COST: 37.44	29) VENDOR SERVICE COST: 0
30) *ASSIGNED TECH*	31) DATE COMPLETE: MAR 14,2014
#1: :	HRS: 1 SHOP: CARPENTRY
#2:	HRS: 1 SHOP: CARPENTRY
#3:	HRS: 1 SHOP: CARPENTRY
#4:	HRS: 1 SHOP: CARPENTRY
32) WORK PERFORMED: <u>INSTALLED BARRIER</u> .REPLACED DAMAGED CEILING TILES.	
33) COMMENTS:	

WORK ORDER

- 1) PRIMARY EMPL:
- 2) REQ DATE: MAR 25,2014@10:20
- 3) REQ MODE: COMPUTER
- 4) LOCATION: G011-AMH-SA
- 5) BED #:
- 6) STATUS: COMPLETED
- 7) TASK DESC: replace ceiling tile
- 8) CONTACT:
- 9) PHONE:
- 10) ENTERED BY:
- 11) SHOP: CARPENTRY
- 12) DATE ASSIGNED: 03/25/14
- 13) PRIORITY: AVERAGE
- 14) EQUIP ID#:
- 15) LOCAL ID:
- 16) EQUIP CAT:
- 17) CONDITION:
- 18) MFGR:
- 19) MODEL:
- 20) SERIAL #:
- 21) OWNER/DEPT: ENGINEERING SERVICE
- 22) PM #:
- 23) PARTS ORDER:
- 24) WORK ACTION:
- 25) WORK CTR: 54182/CEILINGS,REPLACE
- 26) TOTAL HOURS: 36
- 27) TOTAL MATERIAL COST: 312.00
- 28) TOTAL LABOR COST: 510.16
- 29) VENDOR SERVICE COST:
- 30) *ASSIGNED TECH*
- 31) DATE COMPLETE: APR 3,2014
- #1: HRS: 12 SHOP: CARPENTRY
- #2: HRS: 12 SHOP: CARPENTRY
- #3: 4 SHOP: CARPENTRY
- #4: HRS: 4 SHOP: CARPENTRY
- #5: HRS: 4 SHOP: PAINTING
- 32) WORK PERFORMED: went three times on three different occasins
- 33) COMMENTS:

WORK ORDER #

- 1) PRIMARY EMPL:
- 2) REQ DATE: FEB 20,2014@14:12
- 3) REQ MODE: COMPUTER
- 4) LOCATION: F011-AMH-SA
- 5) BED #:
- 6) STATUS: COMPLETED
- 7) TASK DESC: replace ceiling tile
- 8) CONTACT:
- 9) PHONE:
- 10) ENTERED BY:
- 11) SHOP: CARPENTRY
- 12) DATE ASSIGNED: 02/20/14
- 13) PRIORITY: AVERAGE
- 14) EQUIP ID#:
- 15) LOCAL ID:
- 16) EQUIP CAT:
- 17) CONDITION:
- 18) MFGR:
- 19) MODEL:
- 20) SERIAL #:
- 21) OWNER/DEPT: ENGINEERING SERVICE
- 22) PM #:
- 23) PARTS ORDER:
- 24) WORK ACTION:
- 25) WORK CTR: 54182/CEILINGS,REPLACE
- 26) TOTAL HOURS: 8
- 27) TOTAL MATERIAL COST: 40.00
- 28) TOTAL LABOR COST: 76.16
- 29) VENDOR SERVICE COST: 0
- 30) *ASSIGNED TECH*
- 31) DATE COMPLETE: FEB 20,2014
- #1: HRS: 4 SHOP: CARPENTRY
- #2: HRS: 4 SHOP: CARPENTRY
- 32) WORK PERFORMED: REPLACED DAMAGED CEILING TILES.
- 33) COMMENTS:



WORK ORDER # (Original #:
1) PRIMARY EMPL: 2) REQ DATE: MAR 14,2014@08:29
3) REQ MODE: COMPUTER 4) LOCATION: G011-AMH-SA
5) BED #: 6) STATUS: COMPLETED
7) TASK DESC: REPLACE CEILING TILES 9) PHONE:
8) CONTACT: 11) SHOP: CARPENTRY
10) ENTERED BY: 13) PRIORITY: AVERAGE
12) DATE ASSIGNED: 03/14/14 15) LOCAL ID:
14) EQUIP ID#: 17) CONDITION:
16) EQUIP CAT:
18) MFGR: 20) SERIAL #:
19) MODEL: 22) PM #:
21) OWNER/DEPT: ENGINEERING SERVICE 24) WORK ACTION: G1
23) PARTS ORDER:
25) WORK CTR: 54181/CEILINGS,REPAIR 27) TOTAL MATERIAL COST: 80.00
26) TOTAL HOURS: 4 29) VENDOR SERVICE COST: 0
28) TOTAL LABOR COST: 37.44 31) DATE COMPLETE: MAR 14,2014
30) *ASSIGNED TECH*
#1: HRS: 1 SHOP: CARPENTRY
#2: HRS: 1 SHOP: CARPENTRY
#3: HRS: 1 SHOP: CARPENTRY
#4: HRS: 1 SHOP: CARPENTRY
32) WORK PERFORMED: INSTALLED BARRIER .REPPLACED DAMAGED CEILING TILES.
33) COMMENTS:

WORK ORDER

(Original #:

- 1) PRIMARY EMPL:
- 2) REQ DATE: MAY 27, 2014@13:14
- 3) REQ MODE: COMPUTER
- 4) LOCATION: A600-AMH-SA
- 5) BED #:
- 6) STATUS: IN PROGRESS
- 7) TASK DESC: HALL CEILING TILE STAINED
- 8) CONTACT:
- 9) PHONE:
- 10) ENTERED BY:
- 11) SHOP: CARPENTRY
- 12) DATE ASSIGNED: 05/29/14
- 13) PRIORITY: HIGH
- 14) EQUIP ID#:
- 15) LOCAL ID:
- 16) EQUIP CAT:
- 17) CONDITION:
- 18) MFGR:
- 19) MODEL:
- 20) SERIAL #:
- 21) OWNER/DEPT: ENVIRONMENTAL MANAGEMENT
- 22) PM #:
- 23) PARTS ORDER:
- 24) WORK ACTION: G1
- 25) WORK CTR: 54181/CEILINGS, REPAIR
- 26) TOTAL HOURS:
- 27) TOTAL MATERIAL COST:
- 28) TOTAL LABOR COST:
- 29) ~~VENDOR SERVICE COST:~~
- 30) *ASSIGNED TECH*
- 31) ~~DATE COMPLETE~~
- 32) WORK PERFORMED:
- 33) COMMENTS:

5-29-14

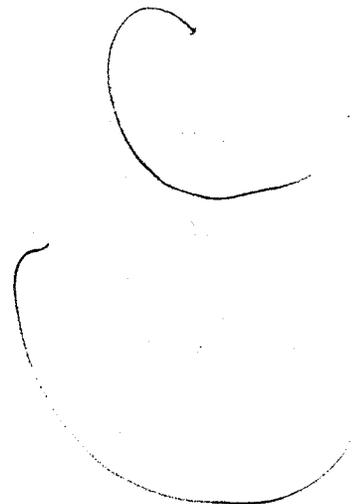
WORK ORDER #
1) PRIMARY EMPL:
3) REQ MODE: COMPUTER
5) BED #:
7) TASK DESC: STAINED CEILLING TILE
8) CONTACT:
10) ENTERED BY:
12) DATE ASSIGNED: 05/29/14
14) EQUIP ID#:
16) EQUIP CAT:
18) MFGR:
19) MODEL:
21) OWNER/DEPT: ENVIRONMENTAL MANAGEMENT
23) PARTS ORDER:
25) WORK CTR: 54181/CEILINGS, REPAIR
26) TOTAL HOURS:
28) TOTAL LABOR COST:
30) *ASSIGNED TECH*
32) WORK PERFORMED:
33) COMMENTS:

(Original #: 1) 1)
2) REQ DATE: MAY 27, 2014@13:19
4) LOCATION: A600-AMH-SA
6) STATUS: IN PROGRESS
9) PHONE:
11) SHOP: CARPENTRY
13) PRIORITY: HIGH
15) LOCAL ID:
17) CONDITION:
20) SERIAL #:
22) PM #:
24) WORK ACTION: G1
27) TOTAL MATERIAL COST:
29) VENDOR SERVICE COST:
31) DATE COMPLETE:

10

5-29-14

12⁰⁴



ATTACHMENT (b)

EXECUTIVE SUMMARY

ALEO-CLEAN Environments, Inc accomplished a three year re-inspection and update of the current asbestos management plan for Audie Murphy Medical Center, San Antonio, Texas in January and February 2009. The inspection was conducted in accordance with the Asbestos Hazard Emergency Response Act of 1986 (AHERA), 40 CFR Part 763, Inspection and Re-inspection in Schools; the EPA Guidance for Controlling Asbestos-Containing Materials in Buildings, EPA 560/5-85-024, June 1985; and Texas Asbestos Health Protection Rules (25 TAC 295), August 2000. The inspection was accomplished by Mr. Michael Williams, Department of State Health Service, Inspector License #602971 working under the direction of Ms. A. Denese Huntsberry, R.E.M., Individual Asbestos Consultant, DSHS License # 10-5460 of ALEO-CLEAN Environments, Inc, San Antonio, Texas, Asbestos Consulting Agency, DSHS License # 10-0493.

BACKGROUND

A Comprehensive Asbestos Inspection was conducted on the Audie Murphy Veterans Administration Medical Center (AMVAMC), 7400 Merton Minter, San Antonio, Texas by Maxim Engineers, Inc. (Maxim) in 1988. The initial asbestos inspection was supplemented by an additional Maxim inspection in 1990 and several subsequent inspections by the VA and private asbestos consulting firms. The surveys were designed to identify locations of friable and non friable asbestos-containing building materials (ACBMs) throughout the building. In 2003, Clean Environments, Inc. (CEI), accomplished a comprehensive review of all asbestos activities at the Center and during a 3-year re-inspection and developed a reconciliation plan to update and continue the Asbestos Management Plan based on the original inspection, intermittent inspections and all other resulting asbestos activity. CEI also conducted the 3-year re-inspections in 2003 and 2006.

FINDINGS and RECOMMENDATIONS

The following list identifies all of the confirmed asbestos containing materials in the Audie Murphy Veterans Administration Medical Center as of March 2009. All of the asbestos containing materials in the building may be managed under the Operations and Maintenance Plan of the Asbestos Management Plan, to be removed only when there is a possibility that the asbestos fibers in the materials may be disturbed during renovation or repair operations or when the budget allows. *More stringent actions are recommended only for the ceiling tiles throughout the Center, because the ceiling tiles (non-acm material) are contaminated with friable asbestos debris. Only certified asbestos workers may disturb or remove ceiling tiles at any time even though the ceiling tiles are considered part of the ceiling in various administrative office and such. Building occupants must be notified that all the ceiling tiles in the Center (including the new additions) are presumed to be contaminated with asbestos debris that is friable because asbestos debris may have blown throughout the plenums which are all connected with (old and new) pipes and ducting systems.*



TRI-COUNTRY ENVIRONMENTAL, INC.
ENVIRONMENTAL CONSULTANTS

March 17, 2005

South Texas Veterans Health Care Systems
Asbestos Supervisor
7400 Merton Mentor
San Antonio, Texas 78229

Re: **Debris in Interstitial
On Ceiling**

Dear Mr. .

Tri-Country Environmental, Inc. was on site to view the areas above the ceiling located in the interstitial between the Ground Floor and Basement. Debris was found to be present which was suspected asbestos containing material (ACM) and noted as "friable". Access must be kept to authorized personnel until the material is determined to be non ACM.

According to the Occupational Safety and Health Administration (OSHA), friable ACM must be removed and/or cleaned before entry to a contaminated area. The OSHA guidelines suggest friable ACM be removed under negative pressure (-.02 min) containment and wet methods with trained personnel. Under the National Emission Standards for Hazardous Air Pollutants (NESHAP), the material can be cleaned utilizing wet methods by trained personnel and HEPA vacuums. Quantities must be less than the 160/260 or 35 cubic feet thresholds under NESHAP.

The material that is located ~~on the plaster ceiling can be cleaned and be left in place.~~ The porous ceiling tile located in some of the areas must be removed and disposed of as asbestos waste.

If you have any questions or concerns, feel free to contact me at 210-738-1700.

Respectfully Submitted,

TRI-COUNTRY ENVIRONMENTAL, INC.

Chester Rackley



4414 Centerview Ste 160
San Antonio, Texas 78228

WellMed Medical Group PA
1715 McCullough
San Antonio TX 78212
866-582-9916

Ramon Figueroa MD

7/17/2013

To whom it may concern,

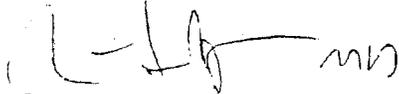
This is a note to confirm that
medical conditions includes:

989 81 Toxic effect of asbestos

He needs continue monitoring of his respiratory systems due to asbestos exposure. If you have any questions in this regard, please do not hesitate to call me.

receives medical treatment at this office. His

Sincerely,



Ramon Figueroa MD

ATTACHMENT (c)

Negative Exposure Assessment
South Texas Veterans Health Care System
Audie L. Murphy Hospital
7400 Merton Minter
San Antonio, Texas 78229

The two Occupational Safety and Health Administration's standards that apply to asbestos at the Audie L. Murphy Hospital are 29 CFR 1910.1001 (General Industry, Subpart Z, Asbestos) and 29 CFR 1926.1101 (Asbestos Standard for the Construction Industry). During normal operations the general industry standard (29 CFR 1910.1001) would apply such as potential exposure to asbestos during the changing of a pipe valve that contains asbestos or if the industry was involved in the manufacturing of a product containing asbestos; however, once construction, demolition, or operations and maintenance on asbestos containing material is initiated, the prevailing standard becomes the construction standard (29 CFR 1926.1101). Notwithstanding, both standards require monitoring.

OSHA defines a Negative Initial Exposure Assessment as: "a demonstration by the employer, which complies with the criteria in paragraph (f)(2)(iii) of this section, that employee exposure during an operation is expected to be consistently below the PELs."

This Negative Exposure Assessment was based on two parts. The first was the monitoring performed by individuals trained in asbestos abatement using procedures taught in Operations and Maintenance Training. The results are at Appendix A. The second was the monitoring of Operations and Maintenance personnel who had received Asbestos Awareness Training and Operations and Maintenance Training. The results of the latter monitoring are at Appendix B.

The specific crafts involved included: carpenters, electricians, and plumbers where they were performing the tasks of removing ceiling tiles, cutting into wallboard and/or disturbing (cutting) pipe and duct mastic.

This work is defined as a Class III activity within the OSHA standard. The activity classes are defined by OSHA as: "*Class I asbestos work* means activities involving the removal of TSI and surfacing ACM and PACM. *Class II asbestos work* means activities 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 mastics. *Class III asbestos work* means repair and maintenance operations, where "ACM", including TSI and surfacing ACM and PACM, is likely to be disturbed. *Class IV asbestos work* means maintenance and custodial activities during which

employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris resulting from Class I, II, and III activities.”

It should be noted that the results of wallboard sampling throughout Audie L. Murphy have been negative for ACBM while some float mud has contained asbestos. OSHA has promulgated information that float mud is not a surfacing material, does not have to be sampled and that the fibers are bound tightly which does not make the disturbance a high risk. Notwithstanding, an exposure assessment was conducted by a competent person, as defined by OSHA, during the disturbance of wallboard containing float mud.

The individual performing the sampling for this assessment was Matthew J. Louderback under the overall direction of Ronald M. Bishop, MPH, CIH. Matt Louderback is a Texas Department of State Health Services (TDSHS) licensed Asbestos Air Monitoring Technician, Asbestos Project Manager, Asbestos Inspector, and Lead Risk Assessor. Ron Bishop is a Certified Industrial Hygienist, a Certified Safety Executive, Diplomate in Environmental Health, Certified Environmental and Safety Compliance Officer, Registered Environmental Manager, and Green Consultant. In addition, he is a TDSHS licensed Asbestos Consultant, a Lead Risk Assessor, a Lead Project Designer, and a Mold Assessment Consultant. Both individuals are employed by AEHS, Inc.

AEHS, Inc. is a TDSHS licensed Asbestos Consultant Agency, Asbestos PCM Laboratory, a Lead Firm and a Mold Assessment Consultant Agency. Additionally, both Matt Louderback and Ron Bishop participate in the American Industrial Hygiene’s Analytical Proficiency Testing program.

The sampling results (Appendix B) indicated that the 8 hour time weighted average was not exceeded performing any of the tasks by any of the personnel. Additionally, because some tasks were 30 minutes in duration, the excursion limit was not exceeded. During the entire exposure assessment, the air monitor also had a pump attached and sampled his breathing zone without receiving an exposure above the permissible exposure limit.

Based on this exposure assessment, personnel performing similar tasks with the same training and using the same work procedures would not be exposed to asbestos above permissible exposure limit.

The controls included the misting of the material with amended water prior to disturbance and using techniques to minimize dust/debris production.

The monitoring should be conducted annually to verify that an exposure does not exist, that the employed methods and controls remain suitable, and the monitoring serve as a refresher concerning potential asbestos exposure.



Ronald M. Bishop, MPH, CIH
Asbestos Consultant – License Number 10-5492



DAILY LOG OF ACTIVITY

PROJECT NO: 13-132 DATE: 7/26/2013

LOCATION: 7400 Merton Minter

CONTRACTOR: VA Maintenance SUPERVISOR:

ACTIVITY

08:00 - Arrive to VA wait in front office for escorts

08:30 - POC arrives calls people over that will be getting monitored
- Pumps calibrated + placed on workers.

8:49 - Personal Air sample started on removing ceiling tiles

9:19 - Personal Air samples stopped
- Other worker enters area to work and be monitored

9:35 - Personal Air sample started on removing ceiling tiles

10:05 - Sample collected + complete
- Go to another area where worker will be working

10:25 - Personal Air sample started on in
Interstitial trouble shooting valves

11:05 - Sample collected from and switched with new
- 11:10 cassette as he switches work to cutting pipe + Duct Mastic

11:45 - Sample collected Go to last area where worker will be
cutting Flat mud + wallboard. 11:50 sample started on

12:20 - sample collected from

12:45 - AFHS off site.

AEHS REPRESENTATIVE:

(SIGNATURE)

CREW SIZE 5 NEGATIVE AIR UNITS 0 RESPIRATOR TYPE 0

CIRCLE THE ONES THAT APPLY

FL TILE MASTIC WINDOW CAULK GLOVE BAG TRANSITE (SIDING) (PANELS)

ROOFING SPRAY ON DUCT MASTIC WALLBOARD FIRABLE INSULATION

DECON: MANUALLY CONSTRUCTED POP-UP TRAILER

AIR SAMPLES COLLECTED: NEGATIVE AIR EXHAUST _____ STEL _____ OUTSIDE AREA _____

INSIDE WORK AREA _____ PERSONAL X BACKGROUND _____ CLEARANCE _____

AIR SAMPLING LOG

Project No.:

13-132

Sampled By:

(Signature)

Project Name:

VA Hospital N.E.A.

Analyzed By:

(Signature)

DATE	SAMPLE NUMBER	TYPE	NAME/SS# SAMPLE LOCATION	PUMP NO	FLOW RATE lpm	TIME		TOTAL TIME min	TOTAL VOLUME l	FIBER COUNT	RESULTS f/cc	TWA f/cc
						START	STOP					
7/26/13	01	P		900787	2.0	8:49	9:19	30	60	3/100	0.02	/
	02			90112		8:45	11:45	180	360	12/100	0.01	0.003
	03			900787		9:35	10:05	30	60	1/100	0.008	0.0005
	04					10:25	11:05	30	60	4/100	0.03	/
	05					11:10	11:45	35	70	3/100	0.01	0.002
	06					11:50	12:20	30	60	4/100	0.03	0.003

A=Area B=Background P=Personnel C=Clearance FB=Field Blank

COMMENTS: _____

*NOTE: TWA CALCULATED FOR ACTUAL EXPOSURE TIME WHICH WAS GREATER THAN 480 MINUTES (8 HOURS).

*NOTE: TWA CALCULATED USING 8 HOURS (ASSUME THAT PERSON HAD ZERO EXPOSURE FOR BALANCE OF THE 8 HOURS).

NOTE: NIOSH METHOD 7400 USED.

NOTE: ESTIMATED LOD: 7 FIBERS/MM³

AEHS, Inc.
4402 CENTER GATE
SAN ANTONIO, TEXAS 78217

PHONE: (210) 656-9300
FAX: (210) 656-8499

TDH ASBESTOS CONSULTING AGENCY LIC NO 10-0335 -- TDH ASBESTOS LABORATORY LIC NO 30-0295

