Environmental Management Consulting, Inc.

October 30, 2006

Gannett Fleming
ATTN: Mr. Pete Lacko
9119 Corporate Lake Drive, Suite 150
Tampa, FL 33634

Mr. Lacko:

I revised the O&M Plan to include recommendations under Section VI.

Please do not hesitate to contact me if you have any questions.

Sincerely,

James P. Jozwiakowski

James P. Jozwiakowski
EMC

JPJ/lr
Enc.

Environmental Management Consulting, Inc.

ASBESTOS OPERATIONS & MAINTENANCE PLAN

FUEL ISLAND BUILDING AND
SHOP BREAK ROOM
ALLIED SYSTEMS LTD
544 KELLOGG AVENUE
JANESVILLE, WI

REVISION DATE: OCTOBER 26, 2006
REPORT DATE: OCTOBER 3, 2006
EMC PROJECT NUMBER: 060360-01

PREPARED FOR:

MS. CORNELIA M. BUTLER
ALLIED SYSTEMS LTD
160 CLAIREMONT AVENUE
DECATUR, GA 30030

PREPARED BY:

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Securing Safer Futures...

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SECTION I

INTRODUCTION

INTRODUCTION

Allied Systems LTD
544 Kellogg Avenue
Janesville, WI

Environmental Management Consulting, Inc. (EMC) was contacted by Ms. Cornelia M. Butler to conduct a limited asbestos survey of the above-mentioned property.

Mr. Todd J. Swenson of EMC inspected the subject property on September 25, 2006. The building was surveyed for the presence of asbestos containing flooring materials. Said materials were sampled accordingly to identify to what percent if any, asbestos was present. The inspection was limited to flooring materials and of plaster walls in the Fuel Island Building. The plaster walls were found negative for asbestos.

The Fuel Island Building contained several types of flooring. The red and white floor tile and mastic, green floor tile and mastic and multi-colored ceramic tile, grout and adhesive are asbestos containing materials. The white ceramic floor in the men's restroom was found negative for asbestos. Quantities for these materials can be found at the end of Section III, Building Specific Materials. It should be noted that much of the material in the Fuel Island Building is in a potentially unsafe condition. The brown and tan floor tile and mastic in the Shop break room also tested positive for asbestos.

This plan shall not be used for the purpose of renovation or demolition without further investigation and inspection by a certified asbestos building inspector.

Todd J. Swenson, All-02601
EPA Certified Asbestos Building Inspector

James P. Jozwiakowski, AMP-01214
EPA Certified Management Planner

SECTION II

OPERATION & MAINTENANCE PLAN

ASBESTOS OPERATIONS AND MAINTENANCE PROGRAM

Policy

No employee, tenant, or unqualified contractor of Allied Systems Ltd. shall perform any type of asbestos work. All removal or disturbance of **asbestos-containing materials (ACM)** shall be performed under controlled conditions by outside contractors whose employees have been properly trained and licensed by the State of Wisconsin Department of Health & Family Services.

O&M Program

The purpose of an operations & maintenance (O&M) program is to:

1. Clean up asbestos fibers, which have been previously released.
2. Prevent future release by minimizing asbestos containing material (ACM) disturbance or damage.
3. To continually monitor the condition of the ACM.

This specific O&M program shall continue until all ACM has been removed from the structure.

The program should alert all workers and building occupants to the location of ACM or suspected ACM, train custodial and maintenance personnel in proper cleaning and maintenance, implement initial and periodic cleaning as necessary, establish a process that assures ACM is not disturbed during minor repairs and/or renovations, and thoroughly reinspect areas with ACM on a regular basis.

The facility owner shall designate a person to be in charge of all asbestos. The designated person's duties will consist of implementing the O&M program. The designated person shall serve as a coordinator to building maintenance, building occupants and the custodial staff.

An O&M program consists of seven (7) major components:

A. Decontamination/Cleaning
B. General Maintenance/Cleaning
C. Emergency Response Procedures
D. Periodic Surveillance
E. Reinspection
F. Recordkeeping
G. Training & Notifications

A. DECONTAMINATION/CLEANING

1. INITIAL CLEANING

Trained staff shall perform the following duties as necessary:

Unless the building has been cleaned using equivalent methods within the previous 6 months, all areas of a building where friable ACBM, damaged or significantly damaged thermal system insulation ACM, or friable suspected ACBM assumed to be ACM are present shall be cleaned at least once after the completion of the inspection:

a. HEPA vacuum or steam-clean all carpets.

b. HEPA vacuum or wet-clean all other floors and all other horizontal surfaces.

c. Dispose of all debris, filters, mopheads, and cloths in sealed, leak-tight containers.

Areas Requiring Initial Cleaning: None

2. ADDITIONAL CLEANING

Additional cleaning shall be required if any asbestos containing building material becomes friable in the future. The guidelines for the additional cleaning are the same as those utilized for initial cleaning. The methods and frequency of these cleaning practices must be documented.

However, it must be noted that improper cleaning on a regular basis may disturb the material and raise fiber levels in the air. Also, in limited-access areas, cleaning would not appreciably reduce exposure to building occupants.

Areas Requiring Initial Cleaning: None

B. GENERAL MAINTENANCE/CLEANING

1. MAINTENANCE/RENOVATION PERMIT SYSTEM

Minimizing inadvertent disruption of ACM during maintenance and renovation operations is often one of the most difficult tasks faced by the asbestos designated person. Initiating a permit system, where all work orders or requests are directed through the "designated person" is a simple yet effective way of controlling disruption of ACM during these activities.

In the permit system, all requests for maintenance/renovation activities are given to the designated person prior to the issuance of a work order to proceed. The designated person then checks the building's asbestos records for information about the presence of ACM where work is to be performed.

The designated person should also physically inspect the area in question to ensure records reflect actual conditions. If no asbestos is present, the work order is issued and the planned actions can proceed.

If ACM is found to be present in the area, the designated person will sign the permit application and either equip properly trained maintenance workers to deal with the ACM during the operation or dispatch an asbestos abatement team to remove the ACM.

2. SPECIAL WORK PRACTICES FOR MAINTENANCE ACTIVITIES

Normal maintenance activities can disturb ACM and raise levels of airborne asbestos. Maintenance workers should be cautioned against conducting any maintenance work in a manner that may disturb ACM.

The nature and extent of special work practices should be tailored to reflect the likelihood that the ACM will be disturbed and that fibers will be released. Four categories of potential disturbance are defined:

a. Contact with the ACM is very unlikely;
b. Accidental disturbance is possible;
c. A small amount of ACM will be disturbed; and
d. A large amount of ACM will disturbed.

a. CONTACT WITH ACM UNLIKELY

In some buildings with ACM, many routine maintenance activities can be conducted without contacting the ACM. For example, changing light bulbs in a fixture on a ceiling with asbestos-containing acoustical plaster can usually be performed without jarring the fixture or otherwise disturbing the ACM. In these situations, few precautions other than normal care are needed. Properly training maintenance personnel of known suspect ACM and safe work methods is all that is required.

b. POSSIBLE DISTURBANCE OF ACM

Routine maintenance and repair includes work on electrical systems, plumbing systems and HVAC systems. Where these systems are near friable ACM, asbestos could be inadvertently released.

The following precautions and procedures should be used if accidental disturbance of ACM is possible:

* Approval should be obtained from the designated person before beginning work. The designated person should make an initial visit to the work site.

* The work should be scheduled after normal working hours (nights or weekends), if possible, or access to the work area should be controlled: doors should be locked from the inside and signs posted to prevent unauthorized persons from entering the work area (e.g., "MAINTENANCE WORK IN PROGRESS, DO NOT ENTER". Note; emergency exits must remain in operation.

* The air-handling system should be shut off or temporarily modified to prevent the distribution of any released fibers to areas outside the work site.

* A 6-mil polyethylene plastic drop cloth should be placed underneath the location of the maintenance work, extending at least 10 feet beyond all sides of the work site.

* Workers should wear at least a half-face negative pressure air-purifying respirator with HEPA filters and protective clothing including a body suit and hood. All workers who may don a respirator must be a participant in the employers respiratory protection program as outlined by OSHA.

* Workers should be properly trained in accordance with OSHA for Class II work.

* After the maintenance work is completed, all tools, equipment and adjacent areas should be HEPA-vacuumed or wiped with a damp cloth.

* If any debris is apparent on the drop cloth, floor or elsewhere, it should be HEPA-vacuumed.

* The plastic drop cloth should be wiped with a damp cloth, carefully folded, and discarded as asbestos waste if contaminated.

* All clothes, vacuum bags/filters, and other disposable materials should be discarded in sealed and labeled plastic bags as asbestos waste.

c. SMALL DISTURBANCES (LESS THAN 3 SQUARE FEET)

Some maintenance and repair activities will, unavoidably disturb the ACM. For example, installing new sprinkler or piping systems will necessitate hanging pipes from structural members or the ceiling. If the beams or ceilings are insulated with ACM, the ACM will be scraped away to install hangers.

Likewise, pulling cables or wires through spaces with ACM or ACM debris is likely to dislodge pieces of the ACM or disturb ACM debris and dust. Furthermore, anytime tiles are moved to enter the space above a suspended ceiling, settled dust on top of the tiles will be re-suspended.

The following procedures are appropriate for maintenance activities, which involve small-scale removal of surfacing ACM or when disturbance of ACM dust and debris or unintentional contact with the ACM is likely.

* Approval should be obtained from the designated person before beginning work, and the work should be supervised. Designated person shall visit the work site and review site specific requirements. The designated person shall issue services to certified abatement personnel as per WDHFS requirements.

* The work should be scheduled after normal working hours (nights or weekends), if possible, or access to the work area should be controlled: doors should be locked from the inside and signs posted to prevent unauthorized persons from entering the work area (e.g., "MAINTENANCE WORK IN PROGRESS, DO NOT ENTER", or, if the asbestos levels are high enough to trigger the OSHA Rule (the PEL or higher), "DANGER - ASBESTOS: CANCER AND LUNG DISEASE HAZARD: AUTHORIZED PERSONNEL ONLY: RESPIRATORS AND PROTECTIVE CLOTHING ARE REQUIRED IN THIS AREA"). Note; emergency exits must remain in operation.

* The air handling system should be shut off or temporarily modified to prevent the distribution of fibers from the work site to other areas in the building.

* Properly trained workers should wear, at a minimum, half face negative air purifying respirators with HEPA filters or powered air purifying respirators with HEPA filters and protective clothing, including a body suit, hood, boots, and gloves.

* A 6-mil polyethylene plastic drop cloth should be placed beneath the location of the maintenance work, extending at least 10 feet beyond all sides of the work site. (In the case of entry into the space above a suspended ceiling, the work site would be the area of the tiles removed to gain access.)

* If entry to the space above a suspended ceiling is necessary, the entry tile(s) should be removed carefully with as little jarring as possible. The air above the opening, the top of the removed tile, all tiles surrounding the opening, and the ACM likely to be disturbed should be misted with amended water. Use a mister with a very fine spray. A thorough misting in the air helps fibers to settle more quickly.

  Cleaning ceiling tiles with a HEPA vacuum cleaner is also effective as long as care is taken not to vibrate tiles and disturb the ACM.

* During the course of the work, any ACM , which is removed should be collected by the HEPA-vacuum. This is best accomplished by placing the vacuum hose just below the ACM being removed.

* Upon completion of the work, any visible debris on the top of the suspended ceiling, on the drop cloth, on the floor, or anywhere else should be collected by cleaning with a HEPA vacuum.

* All equipment and tools should be wiped with a damp cloth or HEPA-vacuumed.

* The plastic sheet should be wiped with a damp cloth, folded, and discarded as asbestos waste.

* All debris, cloths, and vacuum bags/filters should be discarded in sealed and labeled plastic bags as asbestos waste.

* Workers should vacuum their disposable suits before leaving the work site (or remove and discard them as asbestos waste and put on a clean disposable suit), proceed to a shower room, shower with their respirators on, and clean their respirators while in the shower.

d. LARGE DISTURBANCES (MORE THAN 3 SQUARE FEET)

Any maintenance work, which involves removal of 3 or more square feet of surfacing material (or 3 linear feet of thermal system insulation), should be considered a large-scale disturbance of ACM.

An outside abatement contractor must be hired for the removal project before the maintenance work would begin.

* A certified project designer should design the project.

* All of the procedures for asbestos removal should be followed -- construction of containment barriers and decontamination facilities; use of a negative pressure ventilation system; use of protective clothing and respirators by workers; proper disposal of asbestos debris; and proper cleanup of the work site followed by air testing.

* Clearance air monitoring should be performed as specified. An approved laboratory to analyze the air samples must be utilized.

3. SPECIAL WORK PRACTICES FOR RENOVATION AND REMODELING

a. RENOVATION

Building renovation or building system replacement can cause major disturbance of ACM. Moving walls, adding wings, and replacing heating or air conditioning systems involve breaking, cutting, or otherwise disturbing ACM that may be present. Prior removal of ACM is highly recommended in these situations. If prior removal is not undertaken, the renovation project should be considered equivalent to an asbestos removal project.

All the procedures and precautions for asbestos removal recommended by EPA and required by OSHA as previously discussed should be employed. A key step in considering a renovation project is checking on the location and type of ACM that may be affected. Clearance should be obtained from the asbestos program manager before serious project planning is begun.

b. REMODELING

Remodeling or redecorating implies less dramatic structural alteration. However, disturbances of ACM or materials contaminated with asbestos fibers is still possible. Where the remodeling involves direct contact with ACM (e.g., painting or wallpapering over ACM), all of the procedures and precautions recommended by EPA and required by OSHA for asbestos removal should be followed.

If "other" types of ACM have to be removed as part of the renovation project, the removal should be done with care to avoid disturbing the material. For example, small sections of asbestos containing floor tiles can be removed by applying dry ice or heat from a portable heater to the tops of the tiles and then prying them up. Glued carpet may require a mechanical chipper to separate the carpet from the floor. Before a chipper is employed, test the carpet adhesive for asbestos.

4. GUIDELINES FOR WORKING WITH TYPICAL MATERIALS

a. Floor Tile/Adhesive

The primary consideration of asbestos containing floor tile is routine maintenance and replacement. The floor tile, although damaged in certain areas, does not present a health threat to building occupants because normal daily activity, such as walking and routine cleaning should not cause a fiber release.

However, maintenance such as buffing, drilling, and removal creates a potential for a fiber release episode. The following criteria should be incorporated in your maintenance program:

* do not use abrasive floor buffing pads
* all removal and maintenance (drilling, etc.) should be performed in an enclosure with negative air, and using wet methods
* any removed asbestos containing floor tile should be double bagged and disposed of at a DNR-approved landfill
* personal respirator protection and medical surveillance should be used by any person engaging in these activities
* all of the above activities should be conducted by an accredited reputable abatement contractor.

Since improperly performed floor tile maintenance procedures can result in an increase in asbestos exposure, EPA recommends the following guidelines for stripping asbestos-containing floors:

i. AVOID STRIPPING FLOORS. Stripping of floors should be done as infrequently as possible -- perhaps once or twice or less per year depending on circumstances. The frequency should be carefully considered as floor maintenance schedules or contracts are written or renewed.

ii. PROPERLY TRAIN STAFF. Custodial or maintenance staff who, strip floors should be trained to operate properly and safely the machines, pads and floor care chemicals used at the facility.

iii. FOLLOW APPROPRIATE WORK PRACTICES. Custodial or maintenance staff who, strip floors should follow appropriate work practices, such as those recommended here, under informed supervision. Directions from floor tile and floor wax product manufacturers on proper maintenance procedures should be consulted.

iv. STRIP FLOORS WHILE WET. The floor should be kept adequately wet during the stripping operation. Do NOT perform dry stripping. Prior to machine operation, an emulsion of chemical stripper in water is commonly applied to the floor with a mop to soften the wax or finish coat. After stripping and before application of the new wax, the floor should be thoroughly cleaned while wet.

v. RUN MACHINE AT SLOW SPEED. If the machine used to removed the wax or finish coat has variable speeds, it should be run at slow speed (about 175-190 rpm) during the stripping operation.

vi. SELECT THE LEAST ABRASIVE PAD POSSIBLE. The machine should be equipped with the least abrasive pad possible to strip wax or finish coat from asbestos-containing floors.

vii. DO NOT OVER STRIP FLOORS. Stop stripping when the old surface coat is removed. Over stripping can damage the floor and may cause the release of asbestos fibers. Do NOT operate a floor machine with an abrasive pad on unwaxed or unfinished floors.

EPA recommends that you leave asbestos-containing floor covering in place, provided the material is in good condition. However, proper maintenance procedures, such as those outlined above, should always be followed.

b. Ceramic Tile & Grout

This material is normally in a non-friable condition. If this material is damaged, or is in danger of becoming damaged during renovation or demolition, it should be treated as asbestos containing building materials. This holds true until the material is properly sampled and analyzed by certified persons and proven not to contain asbestos. If the material is treated as asbestos containing, it must be removed before the renovation or demolition if there is a possibility of disturbance.

c. Baseboards & Adhesives

This material is also normally in a non-friable condition. If the material becomes damaged, it must be treated as asbestos containing material unless proven otherwise. Unless it is proven no t to contain asbestos, it must be removed before renovation or demolition.

d. Transite Board

This material presents no immediate danger as long as it remains intact in a non-friable condition. Contact to this material, however, should be limited. The material should not be cut, broken, drilled into, or removed without proper techniques. In the case of transite ceiling tiles, they should be disturbed as little as possible. If it is necessary to go above them, proper protective measures should be taken. The measures, as described above for surfacing material, should be utilized.

e. Fire-Rated Doors

Several doors in the facility are suspected to have possible ACM materials inside. Employees shall not drill, cut or otherwise disturb interior component.

f. Vibration Dampers

Several air-handling units have suspect (non-rubber) vibration dampers. Upon demolition of units, gasket materials should be properly sampled or assumed as ACM.

g. Machinery/Equipment

Due the manufacturing processes employed, other equipment/machinery may have ACM gaskets, packets or other ACM components. Upon decommissioning such equipment, suspect material should be properly sampled or assumed as ACM.

h. Drywall Joint Compound

Joint compound used as a finishing material contains a low percentage of asbestos.

In the State of Wisconsin, regulatory agencies view this material differently. Under DNR/EPA rules, composite analysis of the wallboard and joint compound can be performed. Under this rule, materials confirmed less than 1% asbestos are not regulated for demolition projects or disposal requirements.
Under OSHA worker protection issues, joint compound must be separated out for a unique layer. Any layer greater than 1% asbestos falls within the asbestos rules for worker protection.

In this facility, select areas of joint compound may contain greater than 1% asbestos.

Disturbance of the material cannot occur without complying with OSHA provisions.

Activities such as renovation, demolition, cutting into drywall, sanding, etc. may disturb joint compound. Properly trained personnel using proper procedures must perform this work.

C. EMERGENCY RESPONSE PROCEDURES

As long as ACM remains in the building, a fiber release episode could occur. Custodial and maintenance workers should report to the designated person, the presence of debris on the floor, water or physical damage to the ACM, or any other evidence of possible fiber release. Fiber release episodes can also occur during maintenance or renovation projects. The designated person should call an abatement contractor or assign a suitable trained in-house team to clean up debris and make repairs as soon as possible. If an outside contractor is to be used, a company should be selected and retained by contract for quick response action as needed.

1. MINOR EPISODES (LESS THAN 3 SQUARE FEET)

Minor episodes, such as a small section of insulation falling from a pipe or a worker bumping into a beam and dislodging a small amount of fireproofing ACM are defined as such in the AHERA Rule. They can be treated with standard wet cleaning and HEPA-vacuum techniques.

* Workers should thoroughly saturate the debris with amended water using a mister with a very fine spray. The debris should then be placed in a labeled, 6-mil plastic bag for disposal and the floor should be cleaned with damp cloths or a mop. Alternatively, the debris can be collected with a HEPA vacuum cleaner.

* All debris and materials used in the cleanup should be discarded as asbestos waste.

* Workers should vacuum their disposable suits before leaving the work site (or remove them, discard them as asbestos waste, and put on clean, disposable suits), proceed to a shower room, shower with their respirators on, and clean their respirators while in the shower.

* The damaged ACM should be repaired with asbestos-free spackling, plaster, cement or insulation, or sealed with latex paint or an encapsulant.

2. MAJOR EPISODES (GREATER THAN 3 SQUARE FEET)

Major fiber release episodes are very serious events. Large amounts of ACM falling from heights of several feet may contaminate an entire building with asbestos fibers. If a fair amount of ACM delaminates or is dislodged from its substrate, the episode should be considered major.

A large breach in a containment barrier for a maintenance or abatement project should also be considered a major episode. AHERA requires that the response action for any major fiber release episode must be designed and conducted by accredited Project Designers. However, the following response procedures should form the basis for response actions.

* The area should be isolated as soon as possible after the ACM debris is discovered. Where the area can be sealed by doors, they should be locked from the inside (escape corridors must remain in operation) and signs posted to prevent unauthorized personnel from entering the work area ("DANGER - ASBESTOS; CANCER AND LUNG DISEASE HAZARD; AUTHORIZED PERSONNEL ONLY; RESPIRATORS AND PROTECTIVE CLOTHING ARE REQUIRED IN THIS AREA").

* The air-handling system should be shut off or temporarily modified to prevent the distribution of fibers from the work site to other areas of the building. If possible, doors, windows, and air registers should be sealed with 6-mil plastic sheets and tape.

* All the procedures recommended by the EPA and required by OSHA for large-scale removal of ACM should then be used. These include containment barrier, negative pressure ventilation, personal respiratory protection and protective clothing, decontamination facilities, and air testing.

* The air should be tested for asbestos fibers before the plastic barriers are removed and the area reoccupied. That is, air should be sampled at the specified number of locations and analyzed by either phase contrast microscopy or transmission electron microscopy.

D. PERIODIC ACM SURVEILLANCE

Periodic review of the O&M program is essential to insure that the program objectives are being met. A key feature of the review is reinspection of all ACM in the building. Combined with on-going reports of changes in the condition of the ACM made by service workers, the reinspection will insure that any damage or deterioration of the ACM will be detected and corrective action taken. Either the designated person, or someone trained or experienced in ACM assessment, should conduct the reinspections. The results should be documented and placed in the permanent asbestos file.

Periodic Surveillance should be completed at least annually from the implementation of the asbestos management plan. The surveillance should be completed by someone knowledgeable of the buildings and asbestos containing building materials.

The following must be completed:

1. A visual inspection of all areas that are identified in the asbestos management plan as ACBM or assumed ACBM.

2. The date the surveillance is completed, person conducting the surveillance, and any changes in the conditions of the ACBM or assumed ACBM.

3. A copy of the completed surveillance record must be submitted to the designated person for inclusion in the asbestos management plan.

Periodic Surveillance Schedule

Date by which the First Periodic Surveillance must be completed:	September 2007
Date by which the Second Periodic Surveillance must be completed:	September 2008

E. REINSPECTION

Following state of the art rules, at least once every three years after the effective date of the asbestos management plan, a reinspection of all friable and non-friable known or assumed ACBM should be conducted. An EPA accredited, Wisconsin certified building inspector shall conduct the reinspection.

The following data shall be submitted to the designated person within thirty days of the reinspection, for inclusion in the asbestos management plan:

1. Date of reinspection.

2. Name, signature, EPA accreditation and Wisconsin certification numbers of the person conducting the reinspection.

3. Any changes in the condition of known or assumed ACBM.

4. If samples are taken:

    a. Exact location of sampling.
    b. Description of the manner used to determine sampling locations.
    c. Name and signature of the inspector who collected samples.
    d. EPA accreditation and Wisconsin certification numbers of the person collecting samples.

5. Any assessments or reassessments made of friable material, and the name, signature, and certification number of the inspector performing the assessments.

Reinspection Schedule

Date by which the First Asbestos Reinspection must be completed by: September 2009

* Please note that this facility does not fall under AHERA regulations

F. RECORDKEEPING

The rule requires the collection and retention of various records. These records include those pertaining to:

1. Response actions and preventive measures
2. Fiber release episodes
3. Periodic surveillance
4. Operations and maintenance activities and
5. Removal records

Records must be maintained for the duration of ownership of the building and should be transferred to successive owners if the building is sold.

G. TRAINING & NOTIFICATIONS

The building owner or representative thereof, shall ensure, prior to the implementation of the management plan, that all necessary personnel are properly trained. Training requirements are as follows:

1. DESIGNATED PERSON TRAINING

At least one person should receive training sufficient to meet the following responsibilities:

a. Ensure that the activities of any persons who perform inspections, reinspections, and periodic surveillance, develop and update management plans, and develop and implement response actions, including operations and maintenance, are carried out in accordance with regulations.

b. Ensure that all custodial and maintenance employees are properly trained as required by applicable Federal and/or State regulations (e.g., the Occupational Safety and Health Administration asbestos standard for construction, the EPA worker protection rule, or applicable State regulations).

c. Ensure that workers and building occupants, or their legal guardians, informed about inspections, response actions, and post-response action activities, including periodic reinspection and surveillance activities that are planned or in progress.

d. Ensure that short-term workers (e.g., telephone repair workers, utility workers, or exterminators) who may come in contact with asbestos are provided information regarding the locations of ACBM and suspected ACBM assumed to be ACM.

e. Ensure that warning labels are posted in mechanical areas.

The training shall provide basic knowledge of:

a. Health effects of asbestos.

b. Detection, identification and assessment of ACM.

c. Options for controlling ACBM.

d. Asbestos management programs.

e. Relevant Federal and State regulations concerning asbestos, including those of the Occupational Safety and Health Administration, U.S. Department of Labor, the U.S. Department of Transportation and the U.S. Environmental Protection Agency.

2. ALL MAINTENANCE AND CUSTODIAL STAFF

a. The employer shall ensure, prior to the implementation of the O & M provisions of the management plan, that all members of it's maintenance and custodial staff (custodians, electricians, heating/air conditioning engineers, plumbers, etc.) who may work in a building that contains ACBM receive awareness training. Training shall include:

i. Information regarding asbestos and its various uses and forms.

ii. Information on the health effects associated with asbestos exposure.

iii. Locations of ACBM identified throughout the building in which they work.

iv. Recognition of damage, deterioration, and delamination of ACBM.

v. Name and telephone number of the designated person.

3. MAINTENANCE AND CUSTODIAL STAFF WHO MAY CONTACT ASBESTOS

a. The employer shall ensure that all members of its maintenance and custodial staff who conduct any activities that will result in the disturbance of ACBM shall receive training as per OSHA requirements.

4. NOTIFICATIONS

The following steps are to be taken to insure proper notification.

a. Outside contractors must consult the plan prior to any activity. They must agree to immediately notify the designated person if they contact asbestos.

b. OSHA requires building owners to post signs at the entrance to mechanical room/areas detailing as follows:

i. asbestos material present

ii. location of materials

iii. appropriate work practices to ensure material is not disturbed

CAUTION

THIS AREA CONTAINS
ASBESTOS CONTAINING MATERIALS
IN THE FORM OF THERMAL SYSTEM INSULATION.

IT IS ASSUMED THAT ALL INSULATION IS ASBESTOS WITH THE EXCEPTION OF FIBERGLASS.

DO NOT CONTACT OR DISTURB INSULATION IN ANY MANNER

IF DAMAGED MATERIALS ARE PRESENT OR MATERIALS ARE ACCIDENTALLY DISTURBED PLEASE INFORM THE CUSTODIAL/MAINTENANCE STAFF IMMEDIATELY

SECTION III

BUILDING SPECIFIC INFORMATION

MATERIALS FOUND TO CONTAIN ASBESTOS

FUEL ISLAND BUILDING

Material	Quantity	Condition
Red & White Floor Tile & Adhesive	1,041 Sq. Ft.	Poor
Green Floor Tile & Mastic	740 Sq. Ft.	Moderate
Multi-Color Ceramic Tile, Grout & Adhesive	195 Sq. Ft.	Poor

SHOP

Material	Quantity	Condition
Brown & Tan Floor Tile & Mastic	192 Sq. Ft.	Good

MATERIALS FOUND NOT TO CONTAIN ASBESTOS

FUEL ISLAND BUILDING

White Ceramic Floor Tile, Grout & Adhesive
Plaster Walls

SECTION IV

BULK SAMPLING CHART/RESULTS

BULK SAMPLE CHART

SAMPLE DATE: SEPTEMBER 25, 2006

SAMPLE LOCATION: ALLIED SYSTEMS LTD **EMC PROJECT NUMBER: 060360-01**

SAMPLING PERSONNEL: TODD J. SWENSON **INSPECTOR NUMBER: AII-02601**

SAMPLE NUMBER	HOMO CODE	MATERIAL DESCRIPTION	ROOM/ AREA	SPECIFIC SAMPLE LOCATION	LAB RESULTS
001	MF9G	9" Green Floor Tile & Mastic	Fuel Island Building	Hallway at South Entry	8% Chrysotile
002	MF9G	9" Green Floor Tile & Mastic	Fuel Island Building	Break Room	Negative
003	MF9G	9" Green Floor Tile & Mastic	Fuel Island Building	Hallway at North Entry	Negative
004	MF9RW	9" Red & White Floor Tile & Mastic	Fuel Island Building	Telecommunications Room	5% Chrysotile
005	MF9RW	9" Red & White Floor Tile & Mastic	Fuel Island Building	Tire Storage Room	3% Chrysotile
006	MF9RW	9" Red & White Floor Tile & Mastic	Fuel Island Building	Garage at Damage	Negative
007	MCTM1	Red, Green & Gray Ceramic Flooring	Fuel Island Building	Vending Room	5% Chrysotile
008	MCTM1	Red, Green & Gray Ceramic Flooring	Fuel Island Building	Vending Room	Negative
009	MCTM2	White Ceramic Flooring	Fuel Island Building	Mens Restroom	Negative
010	MCTM2	White Ceramic Flooring	Fuel Island Building	Mens Restroom	Negative
011	SP1	Plaster Walls	Fuel Island Building	Mens Restroom	Negative
012	SP1	Plaster Walls	Fuel Island Building	Mens Shower Restroom	Negative
013	SP1	Plaster Walls	Fuel Island Building	Womens Shower Restroom	Negative
014	MF9NW	9" Brown & White Floor Tile & Mastic	Shop Break Room	At Damage	4% Chrysotile
015	MF9NW	9" Brown & White Floor Tile & Mastic	Shop Break Room	At Damage	Negative

W7748 County Highway V
Lake Mills, WI 53551

Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 600/M4-82-020

NVLAP

NVLAP Lab Code 200644-0

Customer: Environmental Management Consulting **Attn:** Todd Swenson
W7748 Cnty Hwy V
Lake Mills, WI 53551

Project: Allied-Janesville: 060360-01

Lab Order ID: 605109
Analysis ID: 605109PLM
Date Received: 9/26/2006
Date Reported: 10/2/2006

Sample ID / *Lab Sample ID*	Description / *Lab Notes*	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes / Treatment
001 - A		8% Chrysotile		92% Other	Gray Non Fibrous Heterogeneous
605109PLM_1	*tile*				Dissolved, Crushed
001 - B		None Detected		100% Other	Black Non Fibrous Homogeneous
605109PLM_16	*mastic*				Dissolved
002 - A		Not Analyzed			
605109PLM_2	*tile*				
002 - B		None Detected	2% Cellulose	98% Other	Black Non Fibrous Homogeneous
605109PLM_17	*mastic*				Dissolved
003 - A		Not Analyzed			
605109PLM_3	*tile*				
003 - B		None Detected	2% Cellulose	98% Other	Black Non Fibrous Homogeneous
605109PLM_18	*mastic*				Dissolved
004 - A		5% Chrysotile		95% Other	Black Non Fibrous Homogeneous
605109PLM_4	*tile*				Dissolved
004 - B		None Detected	5% Cellulose	95% Other	Black Non Fibrous Homogeneous
605109PLM_19	*mastic*				Dissolved

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Sharon Donald (31)
Analyst

Nathaniel Durham, MS or Approved Signatory

Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 600/M4-82-020

NVLAP

NVLAP Lab Code 200664-0

Customer: Environmental Management Consulting **Attn:** Todd Swenson
W7748 Cnty Hwy V
Lake Mills, WI 53551

Project: Allied-Janesville: 060360-01

Lab Order ID: 605109
Analysis ID: 605109PLM
Date Received: 9/26/2006
Date Reported: 10/2/2006

Sample ID / *Lab Sample ID*	Description / *Lab Notes*	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes / Treatment
005 - A		Not Analyzed			
605109PLM_5	*tile*				
005 - B		3% Chrysotile	7% Cellulose	90% Other	Black Non Fibrous Homogeneous
605109PLM_20	*mastic*				Dissolved
006 - A		Not Analyzed			
605109PLM_6	*tile*				
006 - B		Not Analyzed			
605109PLM_21	*mastic*				
007 - A		None Detected		100% Other	Gray Non Fibrous Heterngeneous
605109PLM_7	*tile*				Crushed
007 - B		5% Chrysotile		95% Other	Black, Brown Non Fibrous Heterogeneous
605109PLM_22	*mastic*				Dissolved
007 - C		None Detected		100% Other	Brown Non Fibrous Heterogeneous
605109PLM_23	*grout*				Crushed
008 - A		None Detected		100% Other	Gray Non Fibrous Heterogeneous
605109PLM_8	*tile*				Crushed

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Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 600/M4-82-020

NVLAP

Customer: Environmental Management Consulting **Attn:** Todd Swenson
W7748 Cnty Hwy V
Lake Mills, WI 53551

Project: Allied-Janesville: 060360-01

Lab Order ID: 605109
Analysis ID: 605109PLM
Date Received: 9/26/2006
Date Reported: 10/2/2006

Sample ID / *Lab Sample ID*	Description / *Lab Notes*	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes / Treatment
008 - B *605109PLM_24*	*mastic*	Not Analyzed			
008 - C *605109PLM_25*	*grout*	None Detected		100% Other	Brown Non Fibrous Heterogeneous Crushed
009 - A *605109PLM_9*	*tile*	None Detected		100% Other	White Non Fibrous Homogeneous Crushed
009 - B *605109PLM_26*	*grout*	None Detected		100% Other	Gray, Brown Non Fibrous Heterogeneous Crushed
010 - A *605109PLM_10*	*tile*	None Detected		100% Other	White Non Fibrous Homogeneous Crushed
010 - B *605109PLM_27*	*grout*	None Detected		100% Other	Gray, Brown Non Fibrous Heterogeneous Crushed
011 - A *605109PLM_11*	*finish*	None Detected		100% Other	Yellow, White Non Fibrous Homogeneous Teased
011 - B *605109PLM_28*	*base*	None Detected		60% Other 40% Perlite	Gray Non Fibrous Homogeneous Teased

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Sharon Dooald (31)
Analyst

Nathaniel Durham, MS or Approved Signatory

Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 600/M4-82-020

NVLAP
NVLAP Lab Code 200464-0

Customer: Environmental Management Consulting **Attn:** Todd Swenson
W7748 Cnty Hwy V
Lake Mills, WI 53551

Project: Allied-Janesville: 060360-01

Lab Order ID: 605109
Analysis ID: 605109PLM
Date Received: 9/26/2006
Date Reported: 10/2/2006

Sample ID / *Lab Sample ID*	Description / *Lab Notes*	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes / Treatment
012 - A / *605109PLM_12*	*finish*	None Detected		100% Other	White, Non Fibrous, Homogeneous / Teased
012 - B / *605109PLM_29*	*base*	None Detected		60% Other, 40% Perlite	Gray, Non Fibrous, Homogeneous / Teased
013 - A / *605109PLM_13*	*finish*	None Detected		100% Other	White, Brown, Non Fibrous, Homogeneous / Teased
013 - B / *605109PLM_30*	*base*	None Detected		60% Other, 40% Quartz	Gray, Non Fibrous, Homogeneous / Teased
014 / *605109PLM_14*	*tile only*	4% Chrysotile		96% Other	Gray, Non Fibrous, Heterogeneous / Dissolved, Crushed
015 - A / *605109PLM_15*	*tile*	Not Analyzed			
015 - B / *605109PLM_31*	*mastic*	None Detected		100% Other	Yellow, Non Fibrous, Homogeneous / Dissolved

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Sharon Donald (31)
Analyst

Nathaniel Durham, MS or Approved Signatory

605109

Lab Order ID:

E.M.C., Inc.	Scientific Analytical Institute
W7748 County Highway V	302-L Pomona Dr.
Lake Mills, WI 53551	Greensboro, NC 27407
920-648-6343	336-292-3888

EMC Contact: Todd Swanson	Test Type		Turnaround Time			
Email: EMC@EMCWI.COM	PLM	☒	90 Min.	☐	48 Hours	☐
Sample Location:	Point Count	☐	3 Hours	☐	72 Hours	☐
Sample Date: 9.25.06	PCM	☐	6 Hours	☐	96 Hours	☐
Sampling Personnel:	TEM	☐	12 Hours	☐	120 Hours	☒
Inspector Number:	Lead	☐	24 Hours	☐	144+ Hours	☐
Project Name/#: Allied - Janesville: 060360-01						

Sample Number	Homo Code	Enter Into Laboratory "Sample Description" Field: Material Description	Room/Area	Specific Sample Location	Lab Results
001	3				
2	3				
3	3				
4	3				
5	3				
6	3				
7	3				
8	3				
9	3				
10	3				
11	3				
12	3				
13	3				
14	3				
15	3				

Please only analyze 3 groups to 1st positive layer.
Thank you

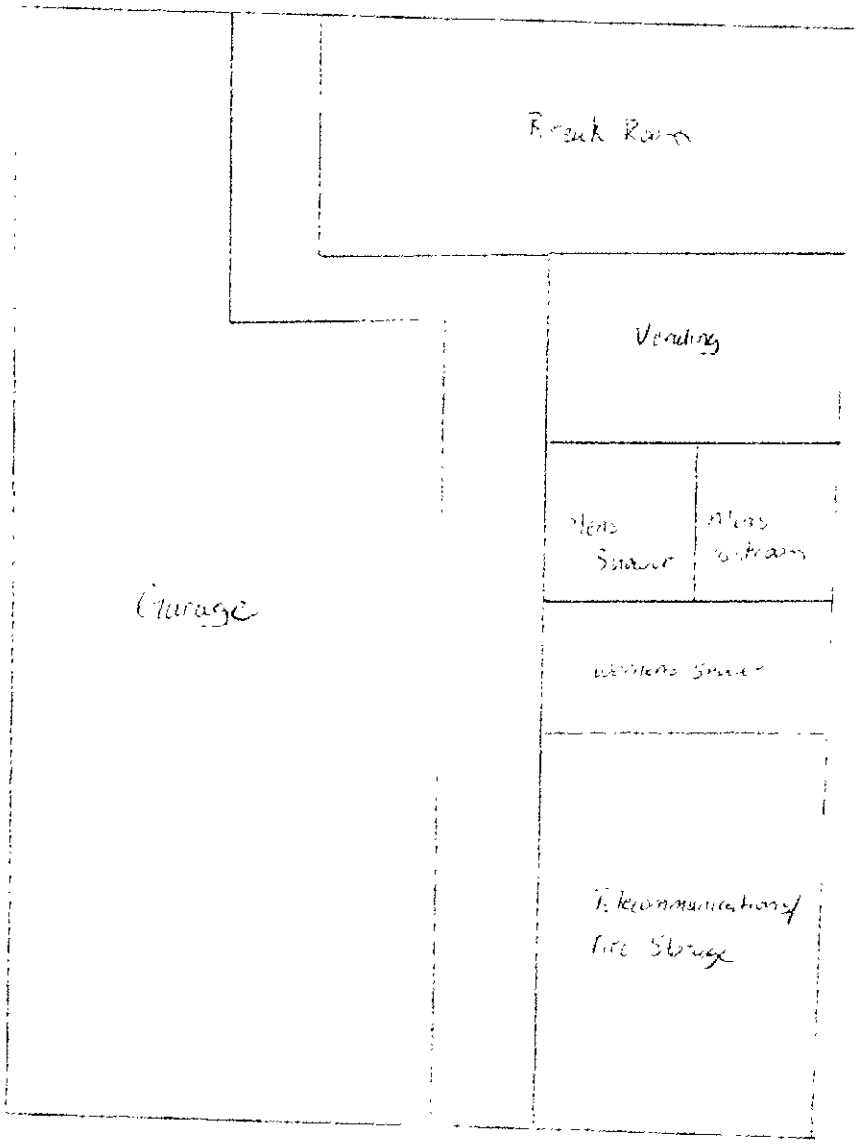
Total # of Samples 15

Relinquished by	Date/Time	Received by	Date/Time
Todd Swanson	9.25.06	[illegible]	9-26 9:30

Accepted ☑
Rejected ☐

SECTION V

SCHEMATIC



Fuel Island Building
1.25.06
Not to Scale

SECTION VI

RECOMMENDATIONS

RECOMMENDATIONS

Fuel Island Building

Flooring materials in the building were evaluated. Asbestos-containing materials were identified and assessed to currently be in a moderate to poor condition. Such materials are difficult to maintain and have a potential to release fibers if disturbed. Materials do not pose a health threat if left undisturbed. Due to continued employee access to the tile areas, and high potential for disturbance, all floor tile and mastic in the Fuel Island Building is recommended for abatement by accredited asbestos professionals. Continued maintenance is no longer a viable option. Materials should be properly abated as a preventive measure.

Mastic beneath ceramic floor areas likely will not cause health concerns unless significant renovation activities occur which disturb the material. Therefore, materials can continue within the O&M plan.

Shop

Flooring materials in the shop are currently in good condition. They can be maintained under the O&M plan.