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OFFICIAL BUSINESS

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- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

**PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300**



**RETURN
TO**



Bureau of Environmental Health

(Name of Sender)

P. O. Box 476

(Street or P.O. Box)

Ellicott City, MD 21043

(City, State, and ZIP Code)

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL
PS Form 3811, Dec. 1980

● **SENDER:** Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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- Show to whom and date delivered
- Show to whom, date, and address of delivery ..

2. **RESTRICTED DELIVERY**

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Mike
TOTAL \$ ~~1.45~~

3. ARTICLE ADDRESSED TO:

Mr. Tom Garver, Vice President
Columbia Residential Management
P.O. Box 816 - Columbia, MD 21044

4. TYPE OF SERVICE:

- REGISTERED
- INSURED
- CERTIFIED
- EXPRESS MAIL

ARTICLE NUMBER

P 446 556 558

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE

Addressee

Authorized agent

Tom Garver

DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEES
INITIALS





Energy Ventures Analysis, Inc.

1901 N. MOORE STREET, SUITE 1200 ARLINGTON, VIRGINIA 22209-1706

PENN CENTER WEST-ONE, SUITE 300 PITTSBURGH, PENNSYLVANIA 15276

TELE: (703) 276-8900

FAX: (703) 276-9541

TELE: (412) 787-8624

FAX: (412) 788-1914

January 21, 1988

Mr. Michael J. Caughlin
Technical Services Program
Bureau of Environmental Health
Howard County Health Department
3325 Ellicott Mills Drive
Ellicott City, Maryland 21043

Dear Mr. Caughlin:

This letter will follow up our recent phone conversation and answer issues raised in your October 6, 1987 letter to Mr. Tom Garver of Columbia Residential Management.

The initial survey as outlined in our specification package for Abbott House has been scheduled next week on January 25, 27 and 28. This survey will identify and record all damage of the acoustical plaster at Abbott House. The expected members of the survey team include EVA (myself and/or Tom Hewson), Columbia Residential Management (Mr. Philip Glover, Tom Garver) and any representative that you may want to send. In addition as requested, the survey team will include Mr. Paul Esposito, M.H.S., a Certified Industrial Hygienist who is Industrial Hygiene Manager of ATEC Associates of Columbia, Maryland.

Sampling and analysis of bulk and air samples will be done in accordance with EPA, OSHA, and NIOSH regulations and guidelines. Bulk samples will be collected by EVA and sent to McCrone Environmental Services for analysis by Polarized Light Microscopy with dispersion staining following EPA's approved procedure entitled "Interim Method for Determination of Asbestos in Insulation Samples." Air sampling will be done by EVA following the method outlined in OSHA regulations Section 1926.58 Appendix A. The air sampling cassettes will be read initially by PCM using NIOSH Method 7400 and OSHA Method ORM. If a calculated air concentration level of greater than .010 f/cc is found using PCM, samples may be further analyzed using TEM following the method outlined in the EPA AHERA regulations (Methodology for Measurement of Airborne Asbestos by Electron Microscopy).

EVA does not anticipate the displacement or relocation of people during the work at Abbott House. All jobs should be small scale/short duration that can be completed and cleared within a few hours. The decontamination procedures for ACM workers, materials and supplies will follow the small scale, short

Mr. Michael J. Caughlin
January 21, 1988
Page Two

duration procedures outlined in OSHA regulations 1926.58 inclusive of "Non Mandatory Appendix G - Work Practices and Engineering Controls for Small Scale, Short Duration Asbestos Removal and Maintenance Activities." These procedures are sufficient to protect from any possible fiber release during work activities. However, if unexpected problems force people to be relocated for an overnight period, people would be put up in a motel.

Should you have any questions, please give me a call.

Sincerely,

A handwritten signature in cursive script, appearing to read "John B. Stamberg". The signature is written in dark ink and is positioned below the word "Sincerely,".

John B. Stamberg, P.E.



DEPARTMENT OF THE ENVIRONMENT

201 WEST PRESTON STREET • BALTIMORE, MARYLAND 21201
AREA CODE 301 • 225- 5755

William Donald Schaefer
Governor

Martin W. Walsh, Jr.
Secretary

MEMORANDUM

September 21, 1987

TO: Mr. Mike Caughlin
Howard County Health Department

FROM: Mr. James W. Lewis *JWL*
Industrial Hygienist
Division of Environmental Disease Control

SUBJECT: Proposal - Inspection and Special Operations and Maintenance Program for
Asbestos Containing Acoustical Plaster Ceilings at Abbott House Apartments

Per your request, I have reviewed the subject document. Conceptually an operations and maintenance approach appears to be a viable solution. Proof of its feasibility however will come when the program is actually implemented at Abbott House Apartments. Thus, it is very important that all activities are supervised by a professional industrial hygienist who should be present, on site, while work is being conducted.

I would like to emphasize that review of the proposal by the Division of Environmental Disease Control should **not** be considered an endorsement or validation of the work practices presented in the proposal. The responsibility for the success or failure of the work practices must rest squarely with the author of the document.

In reading the proposal, there were a few errors in terminology. For example, on page 14, item 4a, uses the term "aggressive water". The correct term, I believe, is "amended water".

There is also some concern in sampling. I believe the proposal should provide more details on sampling methodology, the sampling parameters which will be used, and criteria for the industrial hygienists and the analytical laboratory. The former must be able to demonstrate his/her competency by education and training. The latter must be able to demonstrate proficiency by successfully achieving accreditation by the American Industrial Hygiene Association (AIHA), or other oversight groups with similar performance standards. The laboratory must also provide assurances that it has an adequate in-house quality control program. Since the techniques for wipe dust samples have not been validated, the industrial hygiene firm needs to provide detail a description on its procedures, and together with the laboratory provide assurance that no false negative results will be likely using the prescribed method.

Given that most ceilings are coated with paint, it may be difficult to adequately wet the material for dust suppression during a removal operation. Just reading the proposal, I am not sure if the containment procedures will be adequate. Written justifications and assurances should be obtained from the author of the proposal. The first time the system is used extensive field monitoring should be done to verify the adequacy of the method.

My major reservation with the proposal is that it does not discuss how residents will be handled during an abatement. Since people can not remain in the apartment while the work is being done, the proposal should discuss relocation plans and policies for emergency and routine abatement situations. It should also discuss contingency plans to decontaminate the area, especially occupants' personal property, if a containment barrier fails.

I hope these comments are useful to your office. Before Howard County Health Department accepts this proposal, you should go over it point by point with the industrial hygienist preparing it, and ascertain that all policies and practices are environmentally sound, and that all contingencies have been considered and are covered in the document.

Please call me at 225-5755 if I can provide any additional information.

JWL:kmr

HOWARD COUNTY HEALTH DEPARTMENT

JOYCE M. BOYD, M.D., M.P.H.
COUNTY HEALTH OFFICER



Bureau of Environmental Health
3525 Ellicott Mills Drive
Ellicott City, Maryland 21043

Director - 461-9956
Water & Sewerage, Permits - 461-9933
Community Environmental Health - 461-9944
Technical Services - 461-9955

June 17, 1987

Mr. Tom Garver, Vice President
Columbia Residential Management Inc.
P.O. Box 816
Columbia, MD 21044

RE: Abbott House
4593 Cedar Lane
Columbia, MD

Dear Mr. Garver:

Title 12 of the Howard County Code requires the County Health Department to take cognizance of all conditions dangerous to health and of all unhealthy nuisances within Howard County, institute investigation and remedy such conditions as prescribed in the Code.

In November of 1986, you were notified of the need to take action to abate potential health hazards associated with the cementitious acoustical plaster used on the ceilings in most areas of Abbott House. Samples of this material indicated that it contained between seven and fifteen percent chrysotile asbestos.

At that time you contacted this Bureau and stated Columbia Residential Management, Inc. intended to procure the services of a certified contractor to encapsulate all asbestos containing material in Abbott House.

Efforts along this line continued until March of 1987, when your organization contracted Energy Ventures Analysis Inc. to conduct a study on Abbott House. The study conducted by Mr. John Samberg, P.E., recommended an operation and maintenance program as an alternative to encapsulation.

This Bureau agrees that a stringently regulated operation and maintenance program is a viable option to ameliorate any potential health threat from the asbestos containing acoustical plaster. However, it is this agencies position that the most cost effective long term abatement strategy would be the removal of the asbestos containing material (ACM) from the structure, reducing CRM liabilities and long term maintenance expenses.

If Columbia Residential Management opts to choose an operation and maintenance program (O & M) program this Bureau would require that it include the following:

- (1) A complete and detailed survey of all areas containing ACM, performed under the auspices of a certified industrial hygienist.
- (2) Only trained and licensed personnel may engage in O & M activities.
- (3) Inspection of each unit and common area be conducted on a semi-annual basis by a certified industrial hygienist.
- (4) Air and dust monitoring be conducted semi-annually throughout the structure and whenever any maintenance activities pertaining to ACM are being performed. All air and dust monitoring regimes must be conducted by a certified industrial hygienist, and analysis performed by an appropriately certified analytical laboratory.
- (5) Removal of all deteriorated ACM, prior to the initiation of the O & M program.
- (6) Detailed and precise documentation of all observations and activities.
- (7) Detailed records of all air and dust monitoring activities, and analytical results.

The operation and maintenance program must continue to be in effect as long as any ACM remains in the building. The Howard County Health Department, and Bureau of License and Permits reserves the right to be present during any phase of the operation and maintenance activities, and to review any and all documents pertaining to the O & M program.

Based on the information currently known, and pursuant to Section 12.110 of the Howard County Code the presense of asbestos containing materials in Abbott House is considered an unhealthy nuisance due to its potential to release inhalable fibers associated with several disease processes.

Therefore in accordance with the provisions of Section 12.111 of the Code, you are hereby ORDERED to take the following corrective action:

- (1) Notify this Bureau within 10 days of receipt of your plan for the proper removal and/or maintenance of all asbestos containing materials in Abbott House.

June 17, 1987

- (2) Within 30 days of receipt submit to this Bureau resumes, references, and proof of current licensure with the State of Maryland, Air Management Administration, for all consultants and contractors to be utilized in this abatement project.
- (3) Within 60 days of receipt commence implementation of an approved abatement plan.

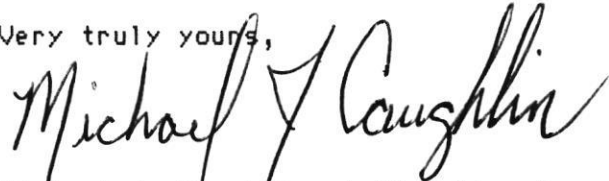
You have the right to request a hearing before the Howard County Board of Health on this ORDER. A request for hearing must be made in writing to the Executive Secretary of the Board of Health at the letterhead address within fifteen (15) calendar days of receipt. If request for approval is not so made, this Order becomes final.

You may be represented by an attorney of your choosing at the hearing and produce evidence in answer to the charges. Prior to the hearing, you may examine and obtain copies of any departmental documents regarding the charges.

Failure to take corrective action required by this Order may result in legal sanctions against you. Each day during which a violation continues is a separate offense.

If you wish to discuss the basis for this Order or the required corrective action, please contact this office to arrange a mutually agreeable time and place.

Very truly yours,



Michael J. Caughlin, Acting Director
Technical Services Program

MJC:vrf

cc: Jim Lewis - DHMH
cc: Clyde Shippe - Bureau of Licenses and Permits
cc: Charles Wilson - Department of Housing and Urban Development

STATE OF MARYLAND

WILLIAM DONALD SCHAEFER
Governor

WILLIAM A. FOGLE, JR.
Secretary

HENRY KOELLEIN, JR.
Commissioner



Department of Licensing and Regulation
DIVISION OF LABOR AND INDUSTRY

501 ST. PAUL PLACE
BALTIMORE, MARYLAND 21202-2272

DIRECT DIAL 301/333-

Dear Employer:

The Maryland Occupational Safety and Health program (MOSH) will present two free training programs on Friday, July 10, 1987. Asbestos and confined spaces are of concern to many Maryland employers. Each program will emphasize safe and proper methods of controlling hazardous workplace conditions. Both programs will be held at the Maryland Psychiatric Research Center, Spring Grove Hospital, Catonsville, Maryland.

Employers engaged in automotive repair, service industries, maintenance and construction may have employees who are exposed to asbestos on their jobs. The asbestos program will address new federal exposure levels, monitoring requirements, work practices, and training requirements.

The Maryland standard for confined spaces may apply to anyone who has employees who enter tanks, pits, reactors, tank cars or trucks, or open surface tanks more than four feet deep.

These programs will review the Maryland law and applicable regulations and remind employers and employees of their rights and responsibilities under the law.

Asbestos

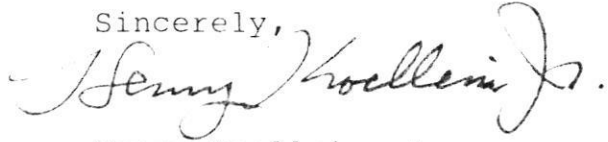
July 10, 1987
9:00 a.m. - 11:30 a.m.
Maryland Psychiatric
Research Center
Spring Grove Hospital
Catonsville, MD

Confined Spaces

July 10, 1987
1:00 p.m. - 3:30 p.m.
Maryland Psychiatric
Research Center
Spring Grove Hospital
Catonsville, MD

Please complete the tear-off form and return it to this office,
so that we may include you in our plans.

Sincerely,



Henry Koellein, Jr.
Commissioner of Labor and Industry

enclosure: Map to MPRC

DIVISION OF LABOR AND INDUSTRY - MOSH TRAINING AND EDUCATION OFFICE
501 St. Paul Place, Baltimore, Maryland 21202

_____ I will attend on July 10, 1987

_____ Asbestos, 9:00 a.m.
(Number to Attend)

_____ Confined Spaces, 1:00 p.m.
(Number to Attend)

_____ I am unable to attend, please notify me of future Training Programs.

NAME OF FIRM: _____ TELEPHONE _____

ADDRESS: _____

_____ ZIP CODE _____

CONTACT PERSON: _____

FOR ASBESTOS RELATED QUESTIONS

MOSH ON-SITE CONSULTATION 333-4210

Etta Mason

MOSH PUBLIC SECTOR CONSULTATION 333-4135

Ron LeClair

MOSH OPERATIONS OFFICE 333-4100

Doug Wallis

DHMH DIVISION OF AIR MANAGEMENT 225-5250

(Licensed Contractors)
Frank Whitehead

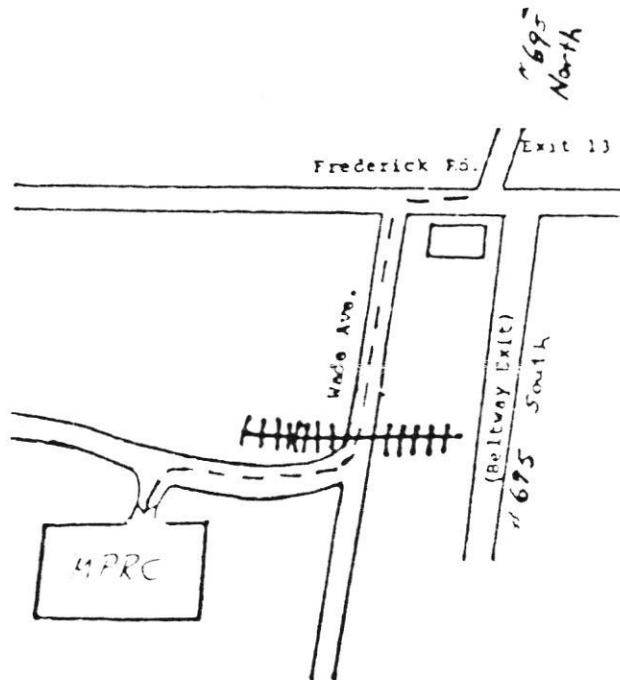
DHMH DIVISION OF SOLID WASTE 225-5659

(Landfills)
John Lawther

Directions to the Research Center

The MPRC is located at the Spring Grove Hospital Center in Catonsville, Maryland.

- * Take Baltimore Beltway (695) to Exit 13 (Catonsville/Frederick Rd)
- * If coming from the north (Towson area), take a right from the exit ramp and turn left on Wade Avenue almost immediately after leaving the exit ramp.
- * If coming from the south (Glen Burnie area) take a left off the exit ramp, go over a bridge and turn left on Wade Avenue.
- * Follow Wade Avenue for 1/4 mile, then bear right for a short distance. The Center will be on your left. Parking is available on the street and in the Center's parking lot behind the building.



HOWARD COUNTY HEALTH DEPARTMENT

JOYCE M. BOYD, M.D., M.P.H.
COUNTY HEALTH OFFICER



Bureau of Environmental Health
3525 Ellicott Mills Drive
Ellicott City, Maryland 21043

Director - 461-9956
Water & Sewerage, Permits - 461-9933
Community Environmental Health - 461-9944
Technical Services - 461-9955

June 17, 1987

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Columbia Residential Management Inc.
P.O. Box 816
Columbia, MD 21044

RE: Abbott House
4593 Cedar Lane
Columbia, MD

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In November of 1986, you were notified of the need to take action to abate potential health hazards associated with the cementitious acoustical plaster used on the ceilings in most areas of Abbott House. Samples of this material indicated that it contained between seven and fifteen percent chrysotile asbestos.

At that time you contacted this Bureau and stated Columbia Residential Management, Inc. intended to procure the services of a certified contractor to encapsulate all asbestos containing material in Abbott House.

Efforts along this line continued until March of 1987, when your organization contracted Energy Ventures Analysis Inc. to conduct a study on Abbott House. The study conducted by Mr. John Stamberg, P.E., recommended an operation and maintenance program as an alternative to encapsulation.

This Bureau agrees that a stringently regulated operation and maintenance program is a viable option to ameliorate any potential health threat from the asbestos containing acoustical plaster. However, it is this agencies position that the most cost effective long term abatement strategy would be the removal of the asbestos containing material (ACM) from the structure, reducing CRM liabilities and long term maintenance expenses.

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The operation and maintenance program must continue to be in effect as long as any ACM remains in the building. The Howard County Health Department, and Bureau of License and Permits reserves the right to be present during any phase of the operation and maintenance activities, and to review any and all documents pertaining to the O & M program.

Based on the information currently known, and pursuant to Section 12.110 of the Howard County Code the presence of asbestos containing materials in Abbott House is considered an unhealthy nuisance due to its potential to release inhalable fibers associated with several disease processes.

June 17, 1987

Therefore, in accordance with the provisions of Section 12.111 of the Code, you are hereby ORDERED to take the following corrective action:

- (1) Notify this Bureau within 10 days of receipt of your plan for the proper removal and/or maintenance of all asbestos containing materials in Abbott House.
- (2) Within 30 days of receipt submit to this Bureau resumes, references, and proof of current licensure with the State of Maryland, Air Management Administration, for all consultants and contractors to be utilized in this abatement project.
- (3) Within 60 days of receipt commence implementation of an approved abatement plan.

You have the right to request a hearing before the Howard County Board of Health On this Order. A request for hearing must be made in writing to the Executive Secretary of the Board of Health at the letterhead address within fifteen (15) calendar days of receipt. If request for approval is not so made, this Order becomes final.

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If you wish to discuss the basis for this Order or the required corrective action, please contact this office to arrange a mutually agreeable time and place.

Very truly yours,

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Technical Services Program

HOWARD COUNTY HEALTH DEPARTMENT

JOYCE M. BOYD, M.D., M.P.H.
COUNTY HEALTH OFFICER



Bureau of Environmental Health
3525 Ellicott Mills Drive
Ellicott City, Maryland 21043

Director - 461-9956
Water & Sewerage, Permits - 461-9933
Community Environmental Health - 461-9944
Technical Services - 461-9955

May 11, 1987

Mr. Clyde S. Shippe
Bureau of Inspections, License, and Permits
Public Works Annex
11226 Route 216
Laurel, MD 20707

Dear Mr. Shippe:

On April 8, 1987, we conducted a joint inspection of Ms. Renee Broom's unit at Abbott House (#109). Ms. Broom was concerned about her son who has respiratory problems, being exposed to asbestos. This concern was heightened by the fact that the ceiling had incurred water damage to the ACM acoustical plaster.

At that time Ms. Broom presented us with a letter from her physician indicating that her son should be removed from the unit, at least until the asbestos problem is abated.

I discussed this matter with Bob Sheesley, the Bureau Director, and it was determined that Columbia Residential Management should procure the services of a certified asbestos contractor to address units where the asbestos may present an imminent health threat. This determination will be based on a joint inspection between this Bureau and Mr. Clyde Shippe of the Bureau of Inspections, Licenses, and Permits.

This activity shall not be contingent upon securing the loan to abate the asbestos problem in the entire building, but shall be done as soon as possible in situations where an imminent health threat is found.

I will be contacting Mr. Garver with Columbia Residential Management to discuss this and other issues on April 16, 1987.

Please contact me with any comments or questions at 461-9955.

Very truly yours,

Michael J. Caughlin, Director
Technical Services Program

HOWARD COUNTY HEALTH DEPARTMENT

JOYCE M. BOYD, M.D., M.P.H.
COUNTY HEALTH OFFICER



Bureau of Environmental Health
3525 Ellicott Mills Drive
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Michael J. Caughlin, Director
Technical Services Program

Jim for your info

SECTION OF INSPECTIONS
AND ENFORCEMENT

HOWARD COUNTY HEALTH DEPARTMENT

'87 JUN 25 AM 7:50

JOYCE M. BOYD, M.D., M.P.H.
COUNTY HEALTH OFFICER



Bureau of Environmental Health
3525 Ellicott Mills Drive
Ellicott City, Maryland 21043

Director - 461-9956
Water & Sewerage, Permits - 461-9933
Community Environmental Health - 461-9944
Technical Services - 461-9955

*Clyde
Let me know
what develops
J
6/24/87*

June 17, 1987

Mr. Tom Garver, Vice President
Columbia Residential Management Inc.
P.O. Box 816
Columbia, MD 21044

RE: Abbott House
4593 Cedar Lane
Columbia, MD

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DIVISION OF INSPECTIONS
AND ENFORCEMENT
HOWARD COUNTY HEALTH DEPARTMENT

'87 JUN 25 AM 7:50

JOYCE M. BOYD, M.D., M.P.H.
COUNTY HEALTH OFFICER



Bureau of Environmental Health
3525 Ellicott Mills Drive
Ellicott City, Maryland 21043

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HOWARD COUNTY HEALTH DEPARTMENT

JOYCE M. BOYD, M.D., M.P.H.
COUNTY HEALTH OFFICER

'87 MAY 13 AM 7:33



Bureau of Environmental Health
3525 Ellicott Mills Drive
Ellicott City, Maryland 21043

Director - 461-9956
Water & Sewerage, Permits - 461-9933
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Dear Mr. Shippe:

On April 8, 1987, we conducted a joint inspection of Ms. Renee Broom's unit at Abbott House (#109). Ms. Broom was concerned about her son who has respiratory problems, being exposed to asbestos. This concern was heightened by the fact that the ceiling had incurred water damage to the ACM acoustical plaster.

At that time Ms. Broom presented us with a letter from her physician indicating that her son should be removed from the unit, at least until the asbestos problem is abated.

I discussed this matter with Bob Sheesley, the Bureau Director, and it was determined that Columbia Residential Management should procure the services of a certified asbestos contractor to address units where the asbestos may present an imminent health threat. This determination will be based on a joint inspection between this Bureau and Mr. Clyde Shippe of the Bureau of Inspections, Licenses, and Permits.

This activity shall not be contingent upon securing the loan to abate the asbestos problem in the entire building, but shall be done as soon as possible in situations where an imminent health threat is found.

I will be contacting Mr. Garver with Columbia Residential Management to discuss this and other issues on April 16, 1987.

Please contact me with any comments or questions at 461-9955.

Very truly yours,

Michael J. Caughlin, Director
Technical Services Program

HOWARD COUNTY HEALTH DEPARTMENT

JOYCE M. BOYD, M.D., M.P.H.
COUNTY HEALTH OFFICER



Bureau of Environmental Health
3525 Ellicott Mills Drive
Ellicott City, Maryland 21043

Director - 461-9956
Water & Sewerage, Permits - 461-9933
Community Environmental Health - 461-9944
Technical Services - 461-9955

November 17, 1986

Mr. Tom Garver, Vice President
Columbia Residential Management, Inc.
P.O. Box 816
Columbia, Maryland 21044

Re: Abbott House
4595 Cedar Lane, Columbia

5495

Dear Mr. Garver:

The following is to inform you of asbestos survey results from recent sampling performed by this Department at the above referenced property, and to advise you of corrective actions to be taken.

On October 2, 1986, in response to a request for assistance from the Inspections and Enforcement Division of the Howard County Department of Public Works, I conducted an inspection of the premises and took seven composite samples of ceiling materials from hallways and apartment units. The results show the chrysolite asbestos content varies from seven to fifteen percent. Copies of laboratory reports are enclosed.

During this and a follow-up inspection October 9, 1986, I noted damaged or deteriorating ceiling material in apartments 801, 509, 407; in the hallways near the elevators on the fourth and seventh floors, at the ends of the fourth floor hallways, and along some of the perimeter of the top (ninth) floor where there was old water damage from roof leakage.

The amount of sampling and physical inspection done is sufficient to characterize the condition and asbestos content of sprayed-on cementitious material in Abbott House, and it is thus reasonable to assume that all such ceiling material contains chrysotile asbestos in proportions large enough to warrant abatement action throughout the entire building.

November 17, 1986

Friable asbestos-containing material (ACM) as I have noted, which may also be present in other units and areas of the building, poses a health hazard from its potential to release inhalable, disease-causing fibers.

There are two courses of action which may be taken:

- 1) complete removal of all sprayed-on ceiling material by a contractor of current licensure with the State of Maryland, Office of Environmental Programs, Air Management Administration;
- 2) inspection of all ceiling surfaces in the building for identification and subsequent removal of deteriorated asbestos-containing, to be followed by the institution of an operation and maintenance (O&M) program to seal, encapsulate, and maintain all remaining ceiling materials in accordance with guidelines set forth in the EPA publication "Guidance for Controlling Asbestos Containing Materials in Buildings", a copy of which is enclosed for your reference. As in (1), this work must be performed by a contractor of current licensure with the Air Management Administration.

Please advise me of your intentions within one month of your receipt of this letter. If you have any questions or if I may be of further assistance, please do not hesitate to contact me at 461-9955.

Sincerely,

John T. Ingalls, Director
Technical Services Program

JTI:hs

cc: Clyde Shippe, Inspections & Enforcement
Dr. Joyce Boyd
Frank Whitehead, Air Management Administration
Rita Benton, Resident Manager, Abbott House

SAMUEL R. WILLIAMS, M.D.
PEDIATRICS AND ADOLESCENT MEDICINE
5411 OLD FREDERICK ROAD, SUITE 12
BALTIMORE, MARYLAND 21229
TELEPHONE (301) 788-2350

April 7, 1987

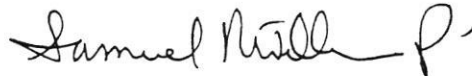
Thomas Garver
5494 Cedar Lane Apt. 109
Columbia, Maryland 21044

Dear Mr. Garver:

Re: Fredrico Broom

Frederico Broom has a severe respiratory condition. I feel the presence of absestos in his environment is detrimental to his health. I suggest different housing for Frederico.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel R. Williams, MD". The signature is fluid and cursive, with a large initial "S" and a distinct "P" at the end.

Samuel R. Williams, MD

pac

MOSH ASBESTOS SEMINAR

I. Introduction

- A. History

- B. Uses and Applications

- C. Health Hazards

II. General Industry Standard 1910.1001

- A. Exposure Monitoring

 - 1. PEL

- 2. Initial Monitoring

- a) Exception

- 3. Periodic Monitoring

- 4. Method

- 5. Employee Notification

B. Regulated Areas
1. Demarcation

2. Access

3. Respirators

4. Prohibited Activities

C. Methods of Compliance
1. Engineering Controls

2. Work Practices

3. Prohibitions

4. Compliance Program

D. Respiratory Protection
1. Provision and Use

2. Selection (Table 1)

3. Respirator Program

4. Fit Testing

E. Protective Clothing

1. Appropriate

2. Removal and Storage

3. Laundering

F. Hygiene Facilities and Practices

1. Change Rooms

2. Showers

3. Lunchrooms

G. Hazard Communication

1. Signs

2. Labels

3. MSDS's

4. Training

H. Housekeeping

1. General

2. Compressed Air

3. Waste Disposal

I. Medical Surveillance

1. Employees Covered

2. Examinations

3. Schedule of Exams

4. Contents of Exams

5. Information to Physician

6. Written Opinion

J. Recordkeeping

1. Initial Monitoring Exemption

2. Exposure Measurements

3. Medical Surveillance Records

4. Training Records

K. Appendices

III. Construction Standard 1926.58

A. Communication Among Employers

B. Regulated Areas

1. Negative Pressure

2. Competant Person

C. Exposure Monitoring

1. Initial

2. Periodic

3. Termination

4. Employee Notification

D. Methods of Compliance

1. Engineering Controls

2. Work Practices

3. Prohibitions

E. Respiratory Protection

1. Provision and Use

2. Selection

3. Respirator Program

4. Fit Testing

F. Protective Clothing

1. Provision

2. Laundering

3. Storage and Transportation

4. Removals, Demolitions, and Renovations

G. Hygiene Facilities

1. General

a) Change Areas

b) Separate Storage

c) Lunch Area

2. Decontamination Areas

H. Hazard Communication

1. Signs
2. Labels
3. Training

I. Housekeeping

1. Vacuuming
2. Waste Disposal

J. Medical Surveillance

1. Employees Covered

2. Examinations
3. Frequency of Exams

4. Contents of Exams
5. Information to Physician
6. Written Opinion

K. Recordkeeping

1. Initial Monitoring Exemption
2. Exposure Measurements
3. Medical Surveillance Records
4. Training Records

- L. Appendices
 - 1. Appendix G

Start
3-3
9-2
53-1

Abbott House Initial Survey 1/27/88

Areas rated as two were tested with samplers rated 2-3 pm. Rated 3, use high volume samplers. Attach performing analysis of air + bulk samples. Cracks along beams, near trash chut in common area, beyond fire door (wall is loose in this area).

Unit 612 - App monitoring

Areas in hallway at slab juncture are frequently crack and tape loses adhesion (701 severe water damage)

7th Floor 1-3 5-2 6-1

801 has serious water damage along wall beneath the laundry room

Detailed report of all inspections and monitoring results will be forthcoming



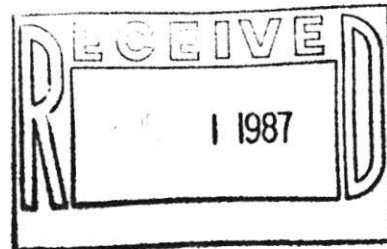
Energy Ventures Analysis, Inc.

1901 N. MOORE STREET, SUITE 1200 ARLINGTON, VIRGINIA 22209 (703) 276-8900

COALCAST

March 27, 1987

Mr. Rick M. Kalyniuk
Vice President, Finance
Columbia Residential Management, Inc.
Post Office Box 816
Columbia, Maryland 21045



Dear Mr. Kalyniuk,

I have made an inspection of the textured ceiling treatment and apartment dust in the Abbott House, 4593 Cedar Lane, Columbia, Maryland on March 25, 1987. Below are my findings:

1. The textured ceiling material sampled from vacant units 206, 207 and 812 contains about 10% chrysotile asbestos and therefore is defined by current Federal regulations as an asbestos containing material (ACM).
2. The asbestos was found to be totally mixed and encapsulated in the original textured ceiling material and subsequently painted. It is essentially a factory encapsulated asbestos with the paint serving as an additional encapsulation of the asbestos.
3. The textured ceiling material even when mechanically disturbed or crushed by external forces "chips" into smaller composite fragments and does not easily pulverize into its pre-mixed components which would release higher percentages of its asbestos content. Asbestos is only exposed at the edges of the chips.
4. The textured ceiling material observed in units 206, 207 and 812 was in excellent condition.
5. The dust obtained from the intake of the heating/cooling ventilation grate in units 206, 207 and 812 showed no detectable levels of asbestos. These samples were sent to an independent laboratory and again no detectable levels of asbestos were found.
6. I also inspected units 407, 509 and 801 which the Howard County Health Department found damage. I found the following:
 - o Unit 407 had a fine line crack where the dry wall tape used between the wall and the ceiling had shrunk and appeared to loose some of its adhesion to the concrete subsurface.

Mr. Rick M. Kalyniuk
March 27, 1987
Page 2

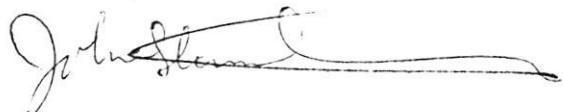
- o Unit 509 had similar damage to 407.
 - o Unit 801 had an area less than a square foot where the textured ceiling material appeared to have been water damaged and repaired.
7. The dust obtained from the intake of the heating/cooling ventilation grate in units 407 and 801 showed no detectable levels of asbestos. These samples were sent to an independent laboratory and again no detectable level of asbestos was found.
 8. There was insufficient dust on the intake of the heating and cooling ventilation grate in unit 509 to take a sample. However, the grate was removed and dust on the floor inside the unit was obtained. It contained a trace of chrysotile asbestos as well as granular cement and gypsum dust characteristic of the components of the textured ceiling material. The dust was very low in paper, textile, clay particles, etc. found in normal apartment dust but was composed of larger sized particles. This dust had the characteristics of dust left after new construction is done.

After inspecting the Abbott House, analyzing the samples and reviewing Howard County Health Department's November 17, 1986 letter. I offer the following suggestions:

1. Encapsulation should not be considered a desirable abatement approach. An encapsulation technique is a surface coating which will not improve areas where drywall tape is detaching or where water damage might occur. In fact additional encapsulent surface coating weight may tend to add to the problem.
2. An inspection, operation and maintenance program should be considered as a potential viable alternative to removal. The dust samples taken from the heating grates provide no evidence that there is an unacceptable level of airborne asbestos fibers.

If you have any questions concerning my findings please feel free to contact me.

Sincerely,



John Stamberg, P.E.

Q11) Does not inherit means is to why encapsulation is not appropriate other than weight.

Q12) what type of OOP program

ATEC® Environmental Services



A Division of ATEC Associates, Inc.

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(301) 621-8070 Washington

PAUL A. ESPOSITO, M.H.S., CIH

Industrial Hygiene Manager

Consulting Environmental Scientists & Geotechnical/Materials Engineers

Philip Glover
Project Manager

Office (301) 381-3360

GENERAL AMERICAN REAL ESTATE, INC.

Crystal Heights Office Center, 10005 Old Columbia Road, Columbia, MD 21046



301-730-3430

Abbott House

5495 CEDAR LANE

COLUMBIA, MARYLAND 21044

Rita D. Benton
Resident Manager

COLUMBIA RESIDENTIAL MANAGEMENT, INC.

COLUMBIA, MARYLAND 21045

703 / 276-8900

Thomas A. Hewson, Jr.
PRINCIPAL



Energy Management Associates, Inc.
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