SECTION 5 AOHS RESPONSE ACTION DESCRIPTION

The nature of recommended response actions is generally very non-descript. There is no uniform or discreet method for determining response activity, either by use of assessment flow charts or the use of numerical algorithms. Virtually all of these numerical systems are intended for the easy use of computerized databases that will lessen the effort taken to perform assessments and also provide a system that is more objective and uniform. It is AOHS' opinion that this is virtually impossible to achieve and has therefore arrived at a slightly more flexible system for recommending responses.

There are currently several numerical classification systems plus the seven category EPA assessment system. AOHS would prefer to conduct a visual inspection of each area and actually assess the nature of the ACM, including condition, damage, potential for future damage, occupancy and accessibility. A major point in the assessment scheme is the relative cost of selected repair of some damaged material versus removal of the same even though the material may not warrant removal based on any factors other than economic.

The only requirement for response actions to be implemented is the one included in the EPA AHERA act which requires response for significantly damaged material and friable material.

The common sense issue is whether the cost of repair is less or more than that for removal and which makes more sense for the particular conditions of the situation.

AOHS uses the scheme for recommending response actions recommended in the EPA "Purple Book", while at the same time taking into account the relative cost effectiveness of the possible response actions.

The following is a condensation of those response actions based on the actual field assessment.

RESPONSE ACTION CODE	REMEDIAL ACTION RECOMMENDED
A	No asbestos containing material found. No further action is required.
B	Asbestos containing material is present but is intact and not friable. An immediate hazard is not present, but the potential for one exists. The material in this area should be part of an ongoing O&M plan. The removal of this material should be planned in conjunction with other building renovations and modifications.
C	Asbestos containing material is present, is damaged and is friable. A potential hazard exists. The area should be decontaminated and documented with air sampling and bulk samples. Damaged areas of ACM should be repaired as soon as possible and the repaired areas should be inspected at least every six months to assure there is no further deterioration in the condition of the ACM. The material in this area should be part of an ongoing O&M plan. Once repaired, the removal of this material can be planned in conjunction with other building renovations and modifications.

AOHS RESPONSE ACTION DESCRIPTION (CONTINUED)

RESPONSE ACTION CODE	REMEDIAL ACTION RECOMMENDED
D	Asbestos containing material is present, is damaged and is friable. A potential hazard exists. The condition of the material, the degree of friability, potential for exposure and relative cost effectiveness suggest immediate removal of all ACM material rather than selective repair. Access to this area should be restricted to minimize exposure and the further release of ACM. The area should be thoroughly decontaminated and all ACM removed as soon as possible. Verification of the removal should be made with air and bulk samples.

** An ongoing Operations and Maintenance (O&M) program should be in place for all areas with ACM to manage it's presence and minimize worker exposure until the material can be properly removed.