THE STANDARD

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US EPA Issues Landmark Greenhouse Gas Reporting Rule

On September 22, 2009, the United States Environmental Protection Agency (US EPA) issued its final rule regarding the mandatory reporting of greenhouse gases (GHGs), codified at 40 CFR 98 (the Rule). Simply put, the Rule requires "large" emitters of greenhouse gases (including carbon dioxide [CO_2], methane [CH_4], nitrous oxide [N_2O], perfluorochemicals [PFCs], hydrofluorocarbons [HFCs], and sulfur hexafluoride [SF_6], plus other fluorinated gases) to track and report emissions on an annual basis. It is estimated that approximately 10,000 facilities and suppliers are covered under the Rule, comprising 85% of the GHG emissions in the United States.

According to the US EPA, the Rule is not intended to supersede existing state and local regulations. Instead, the purpose of the Rule is "to collect accurate and timely emissions data to inform future policy decisions."

Affected entities include fossil fuel and industrial gas suppliers, direct GHG emitters (25,000 metric tons or more of carbon dioxide equivalents per year [CO_2e/y]) and manufacturers of heavy duty and off-road vehicles and engines. Emissions data are collected at the facility level, with the exception of fossil fuel suppliers, that report at the corporate level, and must include emissions from all "source categories" as defined, by the Rule. Data collection begins in January 2010, and the first annual report is due to US EPA by March 31, 2011.

In addition to establishing reporting thresholds and source categories, the final Rule specifies the emissions measurement equipment and calculation methodologies that affected entities are required to use when reporting emissions. (Facilities and suppliers are permitted to use "best available" monitoring methods for the first quarter of 2010.) The Rule also includes record-keeping and monitoring requirements; a final report must be signed by a designated representative and submitted electronically to the Agency.

Environmental Standards is currently comparing the Rule's data collection and record-keeping requirements

(Continued on Page 2, see "GHG Rule")

LEED Consulting Services Now Offered

Environmental Standards is proud to announce that we now have two Leadership in Energy and Environmental Design (LEED) Accredited Professionals (APs) on staff – Joseph Kraycik and Kathy Zvarick of our Geosciences Department. As LEED APs, Mr. Kraycik and Ms. Zvarick will be helping clients integrate the strategies of sustainable development into Phase I Environmental Site Assessments (ESAs) and brownfield redevelopment projects. Environmental Standards is excited to offer this new, value-added service to our clients and is looking forward to the new LEED APs' energy and environmental impact audit of our own corporate headquarters in Valley Forge, Pennsylvania.

LEED is a widely respected green building certification system that

(Continued on Page 2, see "LEED")

Featured Topics

ENVIRONMENTAL STANDARDS

GHG Rule, Continued from Page 1)

against established data management processes. Key findings to date are presented below.

- The Rule requires that emissions must be aggregated at the facility or corporate level (across source categories) and subsequently broken down by source or supplier category; accordingly, data collection must be consistent and transparent at the entity level and below.
- Records and reports must be kept for at least 3 years; therefore, emissions data and calculations must be reproducible. Document management standard operating procedures (SOPs) may need to be updated to reflect the paperwork associated with additional emissions sources and monitoring equipment records.
- The regulatory climate may change, including mandatory GHG emissions caps. With a body of consistent, transparent, and reproducible data, a reporter will be able to identify with accuracy the areas of greatest potential emissions reductions.

Environmental Standards will continue to evaluate the Rule as it impacts our clients' data management processes. ■

LEED, Continued from Page 1)

LEED AP™ provides third-party verification that a building was designed and built using strategies aimed at improving performance across energy and environmental metrics such as energy savings, water efficiency, CO_2 emission reduction, improved indoor environmental quality, and stewardship of resources and sensitivity to their impacts. The purchasing of regionally produced, rapidly renewable, or recycled materials; the amount of daylight provided in workspaces; and the use of low volatile organic compound-emitting building materials are only a few of the many factors that can be evaluated for building certification.

Developed by the US Green Building Council (US GBC), LEED provides building owners and operators a concise framework for identifying and implementing practical and measurable green building design, construction, and operation and maintenance solutions. The LEED professional credentialing and building certification processes are managed by the Green Building Certification Institute, which currently has over 17,000 building certification applications in process. LEED building ratings range from basic certification to silver, gold, and platinum certifications.

The LEED market is growing. As of the date of this article, all construction and renovation of federal buildings must be LEED Silver certified. The city of Pasadena, California, Green Building Ordinance requires all privately owned buildings to achieve LEED certification and municipal buildings with 5,000 square feet or more of new construction to achieve LEED Silver certification. In Boston, Massachusetts, all new buildings of more than 50,000 square feet are required to adhere to LEED standards. The green building industry is expected to reach $60 billion by 2010.

Buildings in the United States are responsible for 39% of the nation's CO_2 emissions, 40% of energy consumption, 13% water consumption, and 15% of the gross domestic product (GDP) per year - making green building a source of significant economic and environmental opportunity. Greater building efficiency can meet 85% of future US demand for energy, and a national commitment to green building has the potential to generate 2.5 million American jobs.

Please contact Mr. Kraycik or Ms. Zvarick at 610-935-5577 if you would like more information about the LEED building certification process. ■

Sample Temperature Preservation Guidance

An Environmental Standards' client recently received a generic request from its contracted laboratory to authorize the analysis of wastewater samples that lacked proper temperature preservation upon receipt at the laboratory. Quality Assurance Specialist/Principal David R. Blye, CEAC, responded that the laboratory request was definitely unusual and advised the client against agreeing to such a "blanket" request.

The Methods Update Rule (MUR; *Federal Register*, March 12, 2007 [Volume 72 Number 47]) revised the sample temperature preservation requirement from 4°± 2°C to less than or equal to 6°C (not frozen) but failed to provide guidance about exceedance of this criterion. According to Mr. Blye, the receipt of out-of-criterion samples should be handled on a case-by-case basis; the laboratory should contact the client for direction. Samples for volatile organic analysis received at room temperature present a much different scenario than samples received for polychorinated biphenyls (PCBs) analysis received at room temperature. The client should have the option of proceeding with the analysis or cancelling the analysis and re-sampling - depending on the samples and parameters in question.

For additional information about sample temperature preservation or other laboratory issues, contact Mr. Blye at 610-935-5577. ■

TVA Safety Slogan Contest

Environmental Standards geoscientist Shaun Gilday was recently chosen as the winner of the Tennessee Valley Authority's (TVA's) Kingston Recovery Site Safety Slogan contest. Mr. Gilday's entry, "Alert Today, Alive Tomorrow" was chosen from a pool of 200. Way to go, Shaun! ■

Dry Cleaner-Focused Remediation Projects

Environmental Standards is actively involved at several dry cleaner release sites – the same question is raised at virtually every work site. Property owners typically want to know if "waste containing tetrachloroethylene (otherwise known as perchloroethylene or PCE) generated from soil found beneath a former dry-cleaner business is a listed hazardous waste?" The question is asked so often that we decided to address the issue in this forum.

PCE-contaminated media may be regulated as a listed hazardous waste because contaminated environmental

media are subject to regulation when the media contain hazardous waste. Generally, US EPA considers contaminated media to contain hazardous waste when it exhibits a characteristic of hazardous waste or is contaminated with concentrations of hazardous constituents from listed hazardous wastes that are above health-based levels (Management of Remediation Waste Under RCRA, EPA530-F-98-026). In addition, spent PCE used in dry cleaning is classified as "F002" (hazardous waste code) when the spent solvent formulation meets the 10%-criterion (by volume) in the listing (Call Center Monthly Report Question; October 1992, RCRA Online #13565). Contaminated media that contain spent PCE meeting the F002 listing description in §261.31 are, therefore, regulated as F002.

US EPA stipulates that a generator must know the source and the before use concentration of PCE in order to determine if the F002 listing applies. If the source of the PCE is from a product spill (*e.g.*, unused solvent), it could be a U210 listed waste. A facility owner or operator must make a good faith effort to determine if a material is a listed hazardous waste. If an owner or operator cannot make such a determination because documentation regarding a source of contamination, contaminant, or waste is unavailable or inconclusive, the owner or operator may assume the source, contaminant, or waste is not a listed hazardous waste - provided that the material in question does not exhibit a characteristic of hazardous waste, RCRA requirements do not apply (Management of Remediation Waste Under RCRA, EPA530-F-98-026).

Furthermore, media that becomes contaminated with hazardous waste must be managed as if it were hazardous waste until it no longer exhibits hazardous waste characteristics or no longer contains the listed waste. US EPA believes that such levels for contaminated media are most appropriately determined on a site-specific basis by the US EPA Region (or authorized state agency) overseeing cleanup of such materials (Management of Remediation Waste Under RCRA, EPA530-F-98-026).

Additional guidance regarding the applicability of the F002 hazardous waste code is available in the following documents:

- Call Center Monthly Report Question; May 1991 (RCRA Online #13469).
- Memo, Lowrance to Wassersug; September 22, 1989 (RCRA Online #11470).

Additional guidance regarding contaminated media is available in the following documents:

- Memo, Fields and Herman to RCRA/CERCLA Senior Policy Managers; October 14, 1998 (RCRA Online #14291).
- Memo, Shapiro to Wright, September 15, 1995 (RCRA Online #11948).
- Memo, Lowrance to Ely; March 26, 1991 (RCRA Online #11593).
- Memo, Cannon to Jorling; June 19, 1989 (RCRA Online #11434). ■

Career Opportunities at Environmental Standards

Environmental Standards is actively seeking qualified individuals to fill the following positions in our Valley Forge, Pennsylvania, location:

- Entry, Mid- and Senior-Level Environmental Chemists
- Environmental Information Technology Manager
- Mid-Level Geoscientist

Environmental Standards also has the following openings in our Kingston/Oak Ridge, Tennessee, location:

- Senior-Level Environmental Chemist
- Senior-Level Geoscientist

For full position descriptions, please visit www.envstd.com/jobs_availability.html.

If you are a motivated, hard-working professional who wants to excel in a fast-paced, client-driven environment, we encourage you to submit your resume for consideration. We are an equal opportunity employer and offer a competitive salary and comprehensive benefits package. ■

Eleven Phase I Environmental Assessments Conducted To Support Major Business Transaction

Teaming with Pittsburgh-based law firm Buchanan Ingersoll & Rooney (www.bipc.com), Environmental Standards assisted Sapa (www.sapagroup.com), a wholly owned subsidiary of Norwegian ORKLA ASA, in the recent acquisition of Indalex Aluminum (Indalex). Environmental Standards, the environmental consultant for the transaction, conducted 11 Environmental Site Assessments (ESAs) within a 5-week period.

The acquisition of Indalex (www.indalex.com) will strengthen Sapa's North American business. With networked facilities coast-to-coast in North America, Indalex supplies extruded aluminum solutions around the world. Sapa entered into an asset purchase agreement with the US aluminum extrusion company for the purchase of substantially all of Indalex's assets in the US and Canada. Under the agreement, Sapa acquired Indalex's 10 active plants (six in the US and four in Canada) with 29 presses and a total capacity of about 315,000 tons per year. Indalex's sales in 2008 were about 200,000 tons, which represented sales of just above $900 million. Indalex has about 1,400 employees.

The purchase represented an underlying enterprise value of approximately $125 million for the business. The transaction allows Sapa to improve its geographical presence in North America, including an introduction into the Canadian region. Also, Sapa will be better positioned to service customers through improved painting, anodizing, and fabrication capabilities.

In addition, Sapa will now be able to optimize customer value through the combined knowledge, experience, and technical competence of the two companies. The combination has a significant potential of realizing cost synergies through plant restructuring and cost improvements in procurement, logistics, and shared services. The new company will have the ability to further develop new end-use applications in North America, thereby benefiting the customers and the extrusion industry as a whole.

"The agreement demonstrates Orkla's and Sapa's commitment to the North American extrusion market. Indalex is an excellent company with a long history in the industry. Combining the two companies will provide a wider product range and better geographic coverage than either company has alone. We will be able to offer our customers a range of products and services that is truly unique," according to Jack Miller, Business Area President Sapa Profiles North America.

The agreement is part of a motion filed with the bankruptcy court in Delaware, along with sale and bid procedures, pursuant to Section 363 of the United States Bankruptcy Code. Final approval of Sapa's agreement was announced at the end of July.

Sapa is the largest aluminum profiles producer in the world. The Sapa Group develops, manufactures, and markets value-added profiles, profile-based building systems, and heat exchanger strips in light-weight material aluminum. Sapa, which is divided into three business areas (Sapa Profiles, Sapa Building System, and Sapa Heat Transfer), is represented in Europe, North America, and Asia. The business concept is built on close cooperation with customers. Sapa is the leading company in its field of operation and has customers in the building, transport, engineering, telecom, and home and office industries. The Sapa Group has 12,000 employees world wide. ■

Radionuclides - When Total Metals May Not Be Total

During environmental investigations, investigators occasionally include various radionuclides in the analytical suite for a project. Sometimes radionuclides can be present as naturally occurring radioactive materials and, in other cases, the radionuclides are anthropogenic. Like many analytes, radionuclides can be determined in environmental media by more than one analytical technique. Data users should understand the benefits and disadvantages of each technique and be aware that terminology can be deceiving.

Consider the analysis for total uranium and thorium, which can be performed by ICP/MS methods or isotopically by alpha spectroscopy. For total uranium, ICP/MS is a very sensitive technique for U-235 and U-238; however, ICP/MS cannot detect U-233, U-234, and U-236 or differentiate among the three. Alpha spectroscopy is the preferred technique for determining U-234, U-235, and U-238; typically, if U-233 or U-236 is detected by alpha spectroscopy, quantitation of the isotope is summed with U-234 or U-235, respectively.

Similarly for thorium, only Th-232 can be detected using ICP/MS because the specific activities unique to Th-230 and Th-228 are not detectable by ICP/MS. If the objective is to determine total thorium, alpha spectroscopy is, therefore, the only option. Essentially, ICP/MS is an extremely sensitive technique for Th-232 analysis and is a very good method for Th-232, but not a good method for total thorium.

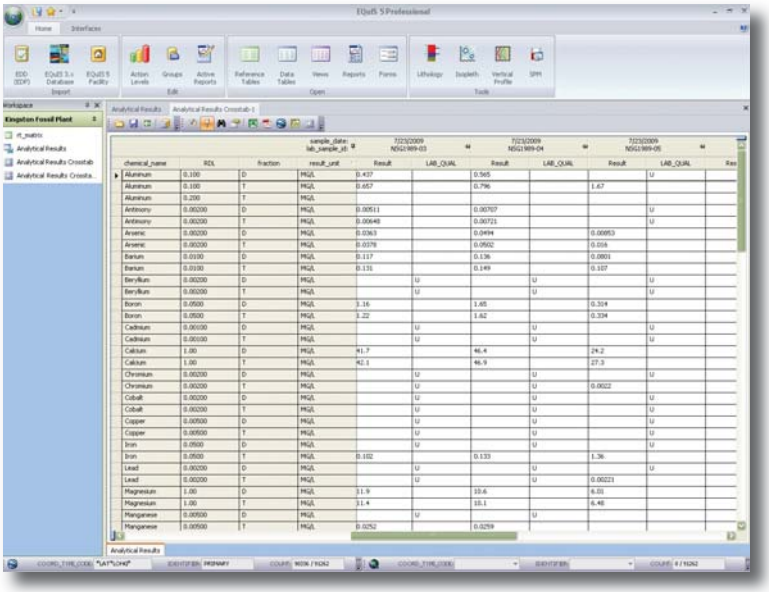
Environmental Standards chemistry/quality assurance, geosciences, and information technologies staffs are providing site-wide quality assurance oversight for several high-profile projects on the East Coast, the West Coast, and the Northwest. For more information, contact Technical Director of Chemistry Rock J. Vitale, CEAC, CPC, at 610-935-5577. ■

EQuIS 5.4 Upgrade

Environmental Standards provides environmental information management services, such as data management, data quality assessments, and sampling project management, to Fortune 500 companies, private industry, engineering firms, laboratories, and other contractors. Our highly skilled information technology and environmental science professionals use advanced information technology tools. Environmental Standards recently decided to upgrade one of our primary data management systems to the industry's leading environmental data management system - EQuIS 5.4. This upgrade promised to enhance both data quality and data management functionality while providing our clients with a streamlined, user-friendly interface for reporting and data analysis tasks.

What made EQuIS 5.4 the "perfect fit" for Environmental Standards and our clients? EQuIS has the ability to integrate a diverse collection of environmental data types into one cohesive system and yet provide user-friendly tools to manage, retrieve, and analyze data. The EQuIS open source approach allows Environmental Standards to customize a solution that fits any project using the latest techniques in Microsoft.Net Frameworks. EQuIS' continuing growth to keep pace with the industry's experience and needs contributed to our upgrade decision.

Numerous enhancements and additions in EQuIS 5.4 are now available to our clients - a few of the most noteworthy are discussed herein. Our clients now have access to various EQuIS core reports that are available through Professional and the web-based user interface, EQuIS Enterprise. EQuIS 5.4 contains an extensive library of core reports such as an enhanced Analytical report, Google Earth reports, Analyte Exceedance Reports, and various Time Series charts. Most report results can be manipulated using a cross-tab tool that has an additional functionality to allow for publishing to EQuIS Enterprise. Action Level reports have always been a vital feature in EQuIS; now, in addition to evaluating analyte exceedance based on a single value, clients can add ranges.



Sample Planning Module (introduced in Version 5.3) continues to provide a competent and flexible sample event management system. Clients can use this module to create sampling tasks, print chain-of-custody records and bottleware labels, and perform simple completeness tests. Environmental Standards' comprehensive sampling event completeness and electronic data validation systems are now intimately joined to this feature for added data quality assurance.

Other new features are data compression for large data file downloads and customizable notifications workflow. EQuIS 5.4 can compress and zip data packages to ensure a speedy file delivery, and the Project Manager can choose whether or not to receive electronic data deliverable (EDD) load failure or success notifications from the EDD auto-loading process.

Environmental Standards' innovative approach to environmental data management combined with EQuIS 5.4 deliver unparalleled functionality for data quality assurance, comprehensive reporting and data mining, and decision-making. This supports Environmental Standards' commitment to provide our clients with a powerful, effective, accessible, and cost-effective data management solution. ■

SW-846 Update IV Creates Confusion For Regulators, Laboratories, And Stakeholders

Significant issues have developed in the environmental community since the US EPA published the notice of the availability of SW-846 Update IV ("Test Methods for Evaluating Solid Waste, Physical/Chemical Methods") in the *Federal Register* in January 2008. To state that regulators, laboratories, and stakeholders are confused would be an understatement.

SW-846 Update IV presented new or revised methods, deleted "obsolete" methods, and revised sample handling requirements. Questions about existing regulatory consent decrees or permits, the specific method version to use and what QC to apply, the development of multiple standard operating procedures, and laboratory accreditation must be answered. The consensus is that stronger language and clarification is required from the Agency.

Technical Director of Chemistry Rock J. Vitale, CEAC, CPC, is a member of the Environmental Laboratory Advisory Board, which is in the final stages of its recommendation process. Environmental Standards will be closely following this issue. Please look for "updates" in future editions of *The Standard*. ■

Conferences: Summer 2009 Recap And Looking Ahead To Fall/Winter 2009

15th Annual Good Laboratory Practice (GLP) Reception and Conference, August 3-4, 2009, Charlottesville, VA. Senior Quality Assurance Chemist Pat Conlon presented "How to Prepare Your Laboratory for an Internal and 'Official' Audit and Document Control." On behalf of The NELAC Institute, Mr. Conlon presented "The NELAC Institute Efforts to Assist Laboratories."

National Environmental Monitoring Conference (NEMC), August 10-14, 2009, San Antonio, TX. Quality Assurance Specialist/Principal Ruth L. Forman, CEAC, presented "The Impact of New US EPA Methods - A Case Study of Contortions and Permutations - US EPA Method 5035." Pat Conlon presented three papers: "1,4-Dioxane Micro-Aqueous Extraction with GCMS SIM," "Discussion of the Limitations of Citeable References for Commonly Accepted Performance Standards for Technical Measurements and for Ethical Practices," and "Poll of Accrediting Bodies on SW-846 Accreditation."

VA AWWA/VWEA 5th Joint Annual Meeting, September 13-17, 2009, Richmond, VA. Pat Conlon presented "How to Prepare Your Laboratory for an Internal and 'Official' Audit and Document Control."

5th Annual Pennsylvania Brownfields Conference, September 15-16, 2009, Harrisburg, PA. Representatives from Environmental Standards attended the conference.

National Petrochemical & Refiners Association (NPRA) Environmental Conference, September 21-22, 2009, Denver, CO. Representatives from Environmental Standards attended the conference.

American Coal Ash Association Members' Fall Meeting, September 22-23, 2009, Denver, CO. Representatives from Environmental Standards attended the conference.

Sediment Management Work Group Fall Sponsor Forum, September 29-30, 2009, Sarasota Springs, NY. Technical Director of Chemistry/Principal Rock J. Vitale, CPC, CEAC, presented "The Physical and Chemical Aspects of Released Fly Ash - What It Is and What It Is Not."

Virginia Manufacturers Association (VMA)/Virginia Department of Environmental Quality (VA DEQ) Outreach Meeting, October 15, 2009, Stuarts Draft, VA. Environmental Standards is proud to sponsor this event for the second year.

25th Annual International Conference on Soils, Sediments, Water and Energy, October 19 - 22, 2009, Amherst, MA. Senior Geoscientist Kevin W. Frysinger, P.G., presented "Bioremediation of Chlorinated Solvents in the Brunswick Shale of Southeast Pennsylvania."

Railroad Environmental Conference (RREC), October 27-29, 2009, Urbana, IL. Ruth Forman will present "The Art of Reading a Lab Report - Can You Pass the Test?"

Pennsylvania Chamber Environmental Compliance Conference, October 29, 2009, Valley Forge, PA. Environmental Standards will exhibit at this conference.

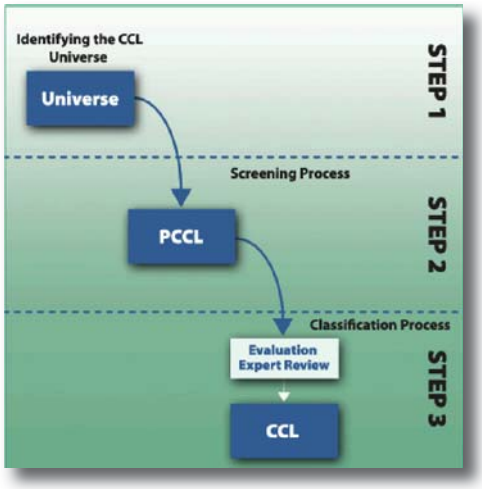
5th Annual Advanced Conference on Natural Resource Damages, November 12-13, 2009, Newark, NJ. Representatives from Environmental Standards will attend the conference.

13th National Brownfields Conference, November 15-18, 2009, New Orleans, LA. Representatives from Environmental Standards will attend the conference. Principal Geoscientist Gerry Kirkpatrick, P.G., will present in a panel session titled "Perspectives on Sustainable Redevelopment." ■

US EPA Publishes Contaminant Candidate List

In September 2009, the US EPA published Contaminant Candidate List 3 (CCL 3), a list of contaminants that may require regulation under the Safe Drinking Water Act. The list includes 104 chemicals and 12 microbiological contaminants that are not currently subject to any proposed or promulgated national primary drinking water regulations. These 116 contaminants are known or anticipated to occur in public water systems. The US EPA is required to publish such a list every 5 years and must decide whether to regulate at least five contaminants on the list. The CCL is used to prioritize research and data collection efforts to facilitate the US EPA's decision on whether or not a specific contaminant should be regulated. CCL 3 includes several inorganics, solvents, estrogenic hormones, antibiotics (*e.g.*, erythromycin), pesticides and their degradates, and nitrosamines in addition to viruses and bacterium. The complete list can be found at www.epa.gov/safewater/ccl/ccl3.html. ■

CCL 3 Process Flow Diagram at right provides a visual overview of the three-step CCL process to identify contaminants for inclusion on the final CCL 3.



Puerto Rico Receives $72 Million In Recovery Act Funds For Water Infrastructure Projects

The American Recovery and Reinvestment Act of 2009 provides significant funding for states to finance high-priority infrastructure projects needed to ensure clean water and safe drinking water. The US EPA is making Recovery Act grants to states and Puerto Rico to fund their State Revolving Fund (SRF) programs, from which assistance is provided to finance eligible high-priority water infrastructure projects. Puerto Rico was awarded nearly $72 million, which will help the Commonwealth and local governments finance overdue improvements to wastewater and drinking water systems, as well as conduct water-quality planning essential to protecting human health and the environment.

"EPA is working to revitalize communities that have been hit hardest by this economic downturn, and creating solutions where they're needed most. Governor Fortuño has been a powerful advocate for bringing recovery to Puerto Rico, and is working closely with EPA to get the local economy moving forward," said US EPA Administrator Lisa P. Jackson. "These are investments in our core mission of protecting people's health and the environment. The jobs they create will strengthen the local economy and build a new foundation for economic prosperity."

Following is a breakdown of the funds granted to Puerto Rico through the Recovery Act:

- $51,630,500 to the Puerto Rico Department of Environmental Quality, which will provide money to municipal governments and wastewater utilities for projects to protect lakes, ponds, and streams in communities across the Commonwealth. The grant will go to the Commonwealth's Clean Water State Revolving Fund program, which provides low-interest loans for water-quality protection projects for wastewater treatment, non-point source pollution control, and watershed and estuary management.

- $19.5 million to the Puerto Rico Department of Health to finance improvements to water projects essential to protecting public health and the environment across the Commonwealth. The funds will go to the Commonwealth's Drinking Water State Revolving Fund program, which provides low-interest loans for drinking water systems to finance infrastructure improvements.

- $526,300 for the Commonwealth's Water Quality Management Planning (WQMP) grant program. Planning is an important step in US EPA's goal to improve water quality in America's lakes, rivers, and streams. WQMP grants support a broad range of activities, such as setting standards, monitoring the quality of the water, developing plans to restore polluted waters, and identifying ways to protect healthy waters from becoming polluted.

At least 20 percent of the funds provided under the Recovery Act are to be used for green infrastructure, water, and energy efficiency improvements and other environmentally innovative projects.

More information is available at www.epa.gov/ow/eparecovery/ as well as recovery.gov. ■

Asbestos – Still In Use

Asbestos is a natural resource that manifests itself as long, thin fibers. There are two types of asbestos - amphibole (chain-like structure) and serpentine (layered structure). Approximately 90% of the asbestos used in construction materials in US buildings is serpentine.

Asbestos, which is used to provide strength, heat insulation, and fire resistance, can be found in more than 3,000 products currently used in the US - trowel applied surfacing materials, cement products (*e.g.*, corrugated sheets and pipes), disc brake pads, gaskets, and roof coatings.

In the last 30 years, the US EPA banned the production of some asbestos-containing material (ACM) for building purposes, materials that are spray-applied for insulation or fireproofing, brush-on and pre-formed foam insulation, and several other materials such as flooring felt. These same banned materials, however, are produced in Mexico and Canada and are imported under the North American Free Trade Act.

Property owners need to have an understanding of the materials currently in place in a building (*e.g.*, floor tiles) prior to renovation activities to ensure that they are safely removed. The only way to accurately determine if materials in place are ACMs is to collect a sample for testing. State-certified asbestos inspectors can assist with the identification of potential ACMs to reduce the amount of testing required. In addition, the materials used to repair, renovate, or construct the building should be evaluated prior to installation to ensure that the least amount of ACM is utilized.

The ACM issue is associated with exposure during application, drying, cutting, and removal. Building owners should evaluate the experience and project plans of contractors as part of the contracting process. The contractor should prepare health and safety plans that address asbestos. ■

ENVIRONMENTAL STANDARDS

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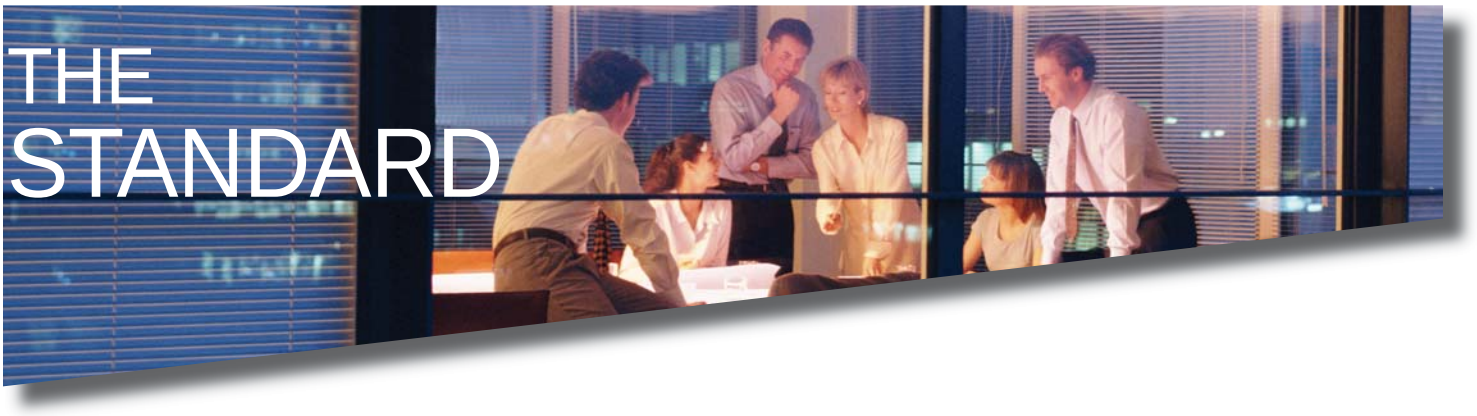

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