SUMMARY ACM SURVEY REPORT

FORMER DELPHI INTERIOR & LIGHTING SYSTEMS PLANT FLINT, MICHIGAN

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1.0 <u>INTRODUCTION</u>

Conestoga-Rovers & Associates (CRA) was retained by General Motors Corporation (GM) to review and revise the Asbestos Containing Materials (ACM) Survey at the Former GM Coldwater Road Delphi I Plant Administration Building (Site) in Flint, Michigan. The survey was completed in April 1997. This review will limit the scope of the survey to the Administration Building.

1.1 <u>DEFINITIONS</u>

For the purposes of this ACM Survey Report the following definitions shall apply:

<u>Accessible</u> – when referring to ACM means that the material is subject to disturbance by building occupants or custodial or maintenance personnel in the course of their normal activities.

<u>Asbestos</u> - the asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite.

<u>Asbestos-containing material (ACM)</u> – any material or product that contains more than 1percent (>1%) asbestos.

<u>Asbestos-containing building material (ACBM)</u> – surfacing ACM, thermal system insulation ACM, or miscellaneous ACM that is found in or on interior structural members or other parts of the building

<u>*Category I non-friable ACM*</u> – asbestos containing packings, gaskets, resilient floor covering, and asphalt roofing products.

Category II non-friable ACM – any material excluding Category I non-friable ACM.

<u>Damaged friable miscellaneous ACM</u> – friable miscellaneous ACM which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or, if applicable, which has delaminated such that its bond to the substrate (adhesion) is inadequate or for which any other reason lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation

of ACM into layers; separation from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars or other signs of physical injury on the ACM.

Damaged friable surfacing ACM – friable surfacing material which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or, if applicable, which has delaminated such that its bond to the substrate (adhesion) is inadequate or for which any other reason lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers; separation from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars or other signs of physical injury on the ACM.

Damaged or significantly damaged thermal system insulation ACM – thermal system insulation ACM on pipes, boilers, tanks, ducts, and other thermal system insulation equipment where the insulation has lost its structural integrity, or its covering, in whole or in part, is crushed, water-stained, gouged, punctured, missing, or not intact such that it is not able to contain fibers. Damage may be further illustrated by occasional punctures, gouges or other signs of physical injury to ACM; occasional water damage on the protective coverings/jackets; or exposed ACM ends or joints.

Encapsulation – an airtight, impermeable, permanent barrier around ACBM to prevent the release of asbestos fibers into the air.

Exposed - when referring to ACM means that the material is subject to disturbance by building occupants or custodial or maintenance personnel in the course of their normal activities and does not require demolition activities to access.

<u>**Friable</u>** - when referring to asbestos means material, that when dry, may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously non-friable material after such previously non-friable material becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure.</u>

Functional Space – a room, group of rooms, or homogeneous area (including crawl spaces or the space between a dropped ceiling and the floor or roof deck above),

designated by a person accredited to prepare management plans, design abatement projects, or conduct response actions.

Homogeneous area – an area of surfacing material, thermal system insulation, or miscellaneous material that is uniform in color and texture.

<u>*Miscellaneous ACM*</u> – means asbestos building materials that is on structural components, structural members or fixtures, such as floor or ceiling tiles, and does not include surfacing material or thermal system insulation.

Non-friable - when referring to asbestos means material, that when dry, may not be crumbled, pulverized, or reduced to powder by hand pressure.

Potential damage – circumstances in which: friable ACBM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities; there are indications that there is a reasonable likelihood that the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.

Potential significant damage – circumstances in which: friable ACBM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities; there are indications that there is a reasonable likelihood that the material or its covering will become significantly damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage; the material is subject to major or continuing disturbance, due to factors including, but not limited to, accessibility or, under certain circumstances, vibration or air erosion.

<u>Regulated ACM (RACM)</u> – friable asbestos material; Category I non-friable ACM that has become friable; Category I non-friable ACM that will be subjected to sanding, grinding, cutting, or abrading; or Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

Significantly damaged friable miscellaneous ACM – damaged friable miscellaneous ACM where the damage is extensive and severe.

<u>Significantly damaged friable surfacing ACM</u> – damaged friable surfacing ACM in a functional space where the damage is extensive and severe.

<u>Surfacing ACM</u> – asbestos material that is sprayed-on, troweled-on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, or other purposes.

<u>Thermal system insulation ACM</u> – asbestos material that is applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior structural components to prevent heat loss or gain, water condensation, or for other purposes.

1.2 <u>METHODOLOGY</u>

This ACM Survey Report (ACM Report) presents the results of the ACM Survey, which to the extent practicable identified all (friable and non-friable) exposed and accessible ACM present at the Site and determined the assessment category for such ACM.

The ACM Report presents the following information:

- location of all ACM;
- determination of friability of ACM;
- sampling activities and analytical results for potential ACM;
- condition of ACM (i.e., degree of damage);
- location of damaged ACM; and
- estimate quantities of confirmed ACM.

The survey and associated sampling activities were conducted based upon the protocols established by the United States Environmental Protection Agency (USEPA) Asbestos Hazard Emergency Response Act (AHERA), Title 40 Code of Federal Regulations (CFR) Part 763. The following tasks were conducted as part of this survey:

- reviewed previous surveys and documentation of previous abatement activities;
- reviewed all available facility utility drawings (i.e., water, electrical, etc.);

- interviewed Site personnel to review previous survey and abatement activities;
- identified potential ACM;
- sampled and analyzed potential ACM to determine asbestos content;
- determined friability;
- determined condition of ACM (i.e., degree of damage); and
- estimated quantities of confirmed ACM.

ACM surveys involve the observation and sampling of thermal systems insulation (i.e. pipe, tank and duct insulation), surfacing materials (i.e. spray-on fireproofing, troweledon plaster), and miscellaneous materials (i.e. floor tile, ceiling tile, roofing materials).

2.0 FACILITY BACKGROUND

The Site is located at 1245 Coldwater Road in Flint, Michigan. The location of the Site is presented on Figure 1.1. The focus of the ACM Survey was the administration building, which comprises approximately 70,000 square feet of floor space. The facility has been in operation since 1953 and has recently ceased operations.

2.1 <u>FUNCTIONAL SPACES</u>

The administration building is connected to the south end of the manufacturing building. It has two stories and a basement that was fully utilized. The administration building is one of six main structures that comprise the entire manufacturing facility. A Site plan is presented on Figure 1.2.

2.2 PREVIOUS ACM INVESTIGATIONS AND ABATEMENT PROGRAMS

A review of Site files and interviews with Site personnel by CRA indicated that GM contracted Industrial Environmental Consultants (IEC) of East Lansing, Michigan to conduct an asbestos survey for the entire facility in October 1990. CRA's review of the IEC Report (January 1991) indicates that the survey focuses on damaged ACM. The IEC Report does not provide a systematic comprehensive ACM inventory for the entire facility.

2.3 <u>DESCRIPTION OF CURRENT ACM CONDITIONS</u>

At the time of the survey, friable ACM in the facility was managed in place with very little being removed. Patched sections of pipe insulation are apparent on almost all of the facility's insulated pipes. CRA did not observe any ACM that presented a high degree of potential hazard to the general worker population (refer to Section 6.1 for the assessment categorization).

All areas where ACM has been repaired have been painted with blue enamel to identify the repaired location. CRA observed hundreds of areas where ACM has been repaired and properly maintained

3.0 <u>SAMPLING PROCEDURES</u>

On-Site survey and sample activities were conducted from February 10, 1997 to March 19, 1997. The survey and associated sampling activities were conducted in accordance with the protocols established by the USEPA AHERA Standard, Title 40 CFR Part 763. Sample locations for the administration building are presented on Figure 3.1.

Potential ACM identified in the administration building consisted of thermal systems insulation (pipe and tank insulation), surfacing material (plaster) and miscellaneous materials (floor tile and mastic, linoleum, wallboard, window glazing, and roofing materials).

3.1 <u>SAMPLE COLLECTION, HANDLING, AND PREPARATION</u>

Nineteen bulk samples of potential ACM were collected for laboratory analysis in order to define specific locations and quantities of exposed ACM. The samples were collected from building materials that may potentially contain ACM. When a sample of potential ACM was collected, details regarding quantity, friability, color, size, surface location and material purpose (e.g., insulation, fire barrier, or mastic) were noted. During the course of the survey, materials with like properties were cross-referenced and recorded for later comparison. A sample summary of potential ACM is presented in Table 3.1.

When bulk sampling thermal systems insulation, which are not assumed to be ACM; at least three randomly distributed samples are collected from each homogeneous area. Many pipelines were insulated with either fibrous glass or foam glass, which are not considered to be asbestos-containing in accordance with the USEPA AHERA Standard, Title 40 CFR Part 763.86(b)(4). Per this guidance, inspectors may visually identify such materials and are not required to collect samples in order to affirm a negative result for asbestos content.

When bulk sampling surfacing material, which are not assumed to be ACM; the quantity of potential ACM was estimated, and sample locations were determined based on a statistically random manner that was representative of the homogeneous area. The appropriate number of samples were collected. At least three samples are collected for each homogeneous area that is 1,000 square feet or less; at least five samples are collected for each homogeneous area that is greater than 1,000 square feet but less than

or equal to 5,000 square feet; or at least seven samples are collected for each homogeneous area that is greater than 5,000 square feet.

When bulk sampling of miscellaneous materials, which are not assumed to be ACM; samples shall be collected in a manner sufficient to determine whether the material is ACM or not ACM

Where possible, a 1-inch square of material was collected to the maximum depth possible. Once collected, samples were immediately placed in sample bags, sealed and labeled. Each sample was labeled specifying the sample location, date, sampler's name and request for analysis. This information was also recorded on the field sample data sheets. After each sample was collected, the sample location was repaired with high temperature caulk and/or duct tape.

3.2 <u>SAMPLE LABELING AND CONTROL</u>

A unique sample numbering system was used to identify each sample that was collected. This system provided a tracking number to allow retrieval and cross-referencing of sample information. The sample number system that was used is described as follows:

Example: A-9564-031697-ML-001

- A-9564 designates potential ACM from CRA Project Number 9564
- 031697 designates the calendar date (mm/dd/yy) the sample was collected
- ML designates the sampler's initials
- 001 designates the sample number

Samples were delivered to Environmental Hazards Services, Inc. (EHS) in Richmond, Virginia under chain-of-custody (COC) control, as described in Section 3.3.

3.3 <u>CHAIN-OF-CUSTODY RECORDS</u>

COC records were used to track all samples from the point of collection to the arrival of the samples at the laboratory. The COC record accompanied the sample shipment to the

laboratory and was signed by the receiving laboratory's sample custodian. COCs are included with the analytical data presented in Appendix A.

3.4 <u>SAMPLE ANALYSIS</u>

Identification and quantification of potential asbestos material in bulk samples was performed by EHS in accordance with United States Environmental Protection Agency (USEPA) "Interim Method for the Determination of Asbestos in Bulk Insulation Samples", 40 CFR Part 763, Subpart E, Appendix E, 1987, using polarized light microscopy (PLM). Laboratory analytical reports are presented in Appendix A.

4.0 <u>ANALYTICAL RESULTS</u>

4.1 <u>OVERVIEW</u>

Asbestos results are reported as a percentage of asbestos-form and non-asbestos-form material. Morphological variations are the basis for the categorization of asbestos materials. The categories are subdivided as follows:

Asbestos-form material	-	chrysotile
	-	crocidolite
	-	amosite
	-	tremolite
Non-asbestos-form material	-	cellulose
	-	fibrous glass
	-	non-fibrous

A summary of the analytical results for the potential ACM samples is presented in Table 4.1.

4.2 EVALUATION OF RESULTS

Table 4.2 summarizes confirmed ACM sample analyses by sample identification, location, and percent ACM.

Fifteen of the nineteen samples collected from various locations throughout the Site were found to contain ACM. Samples were divided into layers at the laboratory if it was determined that the material contained distinct, separate layers (i.e. floor tile and mastic).

5.0 <u>SUMMARY</u>

5.1 <u>ACM QUANTITY ESTIMATE</u>

The following quantities of friable ACM were identified on-Site during the survey:

- 517 linear feet of 2 to 6-inch diameter pipe insulation;
- 162 linear feet of 8 to 12-inch diameter pipe insulation; and
- 200 square feet of tank insulation.

The following quantities of non-friable ACM were identified on-Site during the survey:

• 27,528 square feet of floor tile and mastic.

The quantities of confirmed ACM estimated during this survey are summarized in Table 5.1.

5.2 DESCRIPTION OF CURRENT ACM CONDITIONS

In general, the ACM has been managed in place with very little being removed. Patched areas of insulation are apparent on almost all of the facility's insulated pipes. CRA did not observe any ACM that presented a high degree of risk to the worker population.

5.3 DAMAGED ACM QUANTITY ESTIMATE

There are a number of locations at the Site where damaged material was observed. In most cases, the damaged ACM do not represent a continuous length of insulation; they represent the length of pipe along which several localized sections contain damage.

Approximately 7,886 square feet of non-friable floor tile is damaged. The floor tile is located in the records room, conference room, main hallway, and east end work area.

5.4 ADDITIONAL POTENTIAL ACM

Personnel at the facility indicated that potential ACM at the Site includes roofing materials and siding. These materials were not sampled do to accessibility and safety concerns. Additional potential ACM may also be present behind building walls, above ceilings, or in other areas not accessible to CRA during the Site inspection.

6.0 <u>ACM CATEGORIZATION</u>

6.1 <u>ASSESSMENT</u>

Assessment categories, according to AHERA, associated with all ACM that was identified at the Site are presented in Table 6.1. This table presents the risk assessment for each category of ACM identified. CRA did not observe any ACM that presented a high degree of risk to the general worker population.

7.0 <u>RECOMMENDATIONS</u>

Federal EPA National Emission Standard for Hazardous Air Pollutants (NESHAP) regulations state that the owner of a facility must comply with the following procedures; remove all Regulated ACM (RACM) from a facility being demolished or renovated before any activity begins that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal.

The pipe insulation, tank insulation, and siding are defined under NESHAP as friable ACM. The ACM floor tile and roofing materials are defined under NESHAP as Category I non-friable ACM.

According to the NESHAP regulations, the floor tile and roofing materials are considered to be non-Regulated ACM (non-RACM) and may not be required to be removed prior to demolition or renovation. The pipe insulation, tank insulation, and siding are friable RACM and are required to be removed prior to demolition or renovation.

8.0 <u>CERTIFICATION</u>

On-Site survey and sampling activities were conducted from February 10, 1997 to March 19, 1997. The survey and associated sampling activities were conducted in accordance with the protocols established by the USEPA AHERA Standard, Title 40 CFR Part 763.

Mr. Matthew Lazaric conducted the survey, sampling activities and assessment. Mr. Lazaric is a USEPA accredited Building Inspector (Accreditation #599-IR-001), and a USEPA accredited Management Planner (Accreditation #599-MR-001). In addition to the federal accreditations Mr. Lazaric also maintains a State of Michigan Inspector's accreditation (Accreditation #A14827) and Management Planner's accreditation (329-70-0937).

I hereby acknowledge that the contents of this report accurately represent the conditions found at the facility during the survey.

Respectfully submitted,

Matthew G. Lazaric

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TABLE 3.1

SAMPLE SUMMARY FORMER DELPHI INTERIOR & LIGHTING SYSTEMS PLANT ADMINISTRATION BUILDING FLINT, MICHIGAN

Sample ID (A-9564-)	Material
012	Floor Tile
013	Floor Tile
014	Floor Tile
015	Ceiling Tile
016	Floor Tile
017	Floor Tile
018	Ceiling Tile
019	Floor Tile
020	Floor Tile
021	Floor Tile
022	Pipe Insulation
023	Pipe Insulation
024	Floor Tile
025	Pipe Insulation
026	Tank Insulation
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TABLE 3.1

SAMPLE SUMMARY FORMER DELPHI INTERIOR & LIGHTING SYSTEMS PLANT ADMINISTRATION BUILDING FLINT, MICHIGAN

Sample ID (A-9564-) 029 *Material* Floor Tile

030

Pipe Insulation

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TABLE 4.1

ACM ANALYTICAL SAMPLE RESULTS FORMER DELPHI INTERIOR & LIGHTING SYSTEMS PLANT ADMINISTRATION BUILDING FLINT, MICHIGAN

		Percent Asbestos			Percent Non-Asbestos			
						<u>Fibro</u>	<u>ous</u>	<u>Non-fibrous</u>
Sample ID	Material	Chrysotile	Amosite	Crocidolite	Tremolite	Cellulose	Glass	Other
012	Floor Tile	20%						80%
	Mastic	5%						95%
013	Floor Tile	5%						95%
	Mastic							100%
014	Floor Tile	25%						75%
	Mastic							100%
015	Ceiling Tile					60%	10%	30%
016	Floor Tile	2%						98%
	Mastic					40%		60%
017	Floor Tile							100%
	Mastic					10%		90%
018	Ceiling Tile						90%	10%
019	Floor Tile	15%						85%

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TABLE 4.1

ACM ANALYTICAL SAMPLE RESULTS FORMER DELPHI INTERIOR & LIGHTING SYSTEMS PLANT ADMINISTRATION BUILDING FLINT, MICHIGAN

		Percent Asbestos			Percent Non-Asbestos			
						<u>Fibre</u>	<u>ous</u>	<u>Non-fibrous</u>
Sample ID	Material	Chrysotile	Amosite	Crocidolite	Tremolite	Cellulose	Glass	Other
	Mastic					5%		95%
020	Floor Tile	15%						85%
	Mastic							100%
021	Floor Tile	4%						96%
	Mastic	30%						70%
022	Pipe Insulation					85%		15%
023	Pipe Insulation	15%				75%		10%
024	Floor Tile	25%						75%
025	Pipe Insulation	10%	40%					50%
026	Tank Insulation	60%				12%		28%
027	Pipe Insulation	8%	37%			12%		43%

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TABLE 4.1

ACM ANALYTICAL SAMPLE RESULTS FORMER DELPHI INTERIOR & LIGHTING SYSTEMS PLANT ADMINISTRATION BUILDING FLINT, MICHIGAN

		Percent Asbestos			Percent Non-Asbestos			
						Fibro	ous	<u>Non-fibrous</u>
Sample ID	Material	Chrysotile	Amosite	Crocidolite	Tremolite	Cellulose	Glass	Other
028	Pipe Insulation	5%	40%			3%		52%
029	Floor Tile	13%						87%
	Mastic	<1%				4%	1%	95%
030	Pipe Insulation	10%	37%			13%		40%

TABLE 4.2

SUMMARY OF CONFIRMED ACM SAMPLE RESULTS ADMINISTRATION BUILDING FORMER DELPHI INTERIOR & LIGHTING SYSTEMS PLANT FLINT, MICHIGAN

		Percent Asbestos				
Sample ID (A-9564-)	Material	Chrysotile	Amosite	Crocidolite	Total Asbestos	
012	Floor Tile	20%			20%	
	Mastic	5%			5%	
013	Floor Tile	5%			5%	
014	Floor Tile	25%			25%	
016	Floor Tile	2%			2%	
019	Floor Tile	15%			15%	
020	Floor Tile	15%			15%	
021	Floor Tile	4%			4%	
	Mastic	30%			30%	
023	Pipe Insulation	15%			15%	
024	Floor Tile	25%			25%	
025	Pipe Insulation	10%	40%		50%	
026	Tank Insulation	60%			60%	
027	Pipe Insulation	8%	37%		45%	
028	Pipe Insulation	5%	40%		45%	
029	Floor Tile	13%			13%	
	Mastic	<1%			<1%	

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TABLE 5.1

SUMMARY OF CONFIRMED ACM QUANTITIES ADMINISTRATION BUILDING FORMER DELPHI INTERIOR & LIGHTING SYSTEMS PLANT FLINT, MICHIGAN

Administration Building	Linear Feet	Square Feet
Pipe Insulation	679	
Tank Insulation		200
Floor Tile		27,528
TOTAL	679	27,728

TABLE 6.1

ACM ASSESSMENT CATEGORIZATION ADMINISTRATION BUILDING FORMER DELPHI INTERIOR & LIGHTING SYSTEMS PLANT FLINT, MICHIGAN

			Quar	ıtity		
Location/Column	Material		Linear Feet	Square Feet		
Assessment Category 1: Damaged or	Significantly Damaged Th	nermal Systems Insulation	ACM			
		Total Category 1:	0	0		
Assessment Category 2: Damaged Fri	able Surfacing ACM					
		Total Category 2:	0	0		
Assessment Category 3: Significantly	Damaged Friable Surfaci	ng ACM				
		Total Category 3:	0	0		
Assessment Category 4: Damaged or Significantly Damaged Friable Miscellaneous ACM						
		Total Category 4:	0	0		

TABLE 6.1

ACM ASSESSMENT CATEGORIZATION ADMINISTRATION BUILDING FORMER DELPHI INTERIOR & LIGHTING SYSTEMS PLANT FLINT, MICHIGAN

			Quant				
Location/Column	Material		Linear Feet	Square Feet			
Assessment Category 5: ACBM with	h the Potential for Damage						
Records Room	Floor Tile			920			
Hallway	Floor Tile			1,721			
East End Work Area	Floor Tile			3,600			
Opposite Records Room	Floor Tile			815			
Conference Room	Floor Tile			830			
Women's Room	Floor Tile			144			
Elevator 16	Floor Tile			30			
Computer Room	Floor Tile			2,000			
Nurses' Suite	Floor Tile			1,550			
West End	Floor Tile			7,000			
Closet Next Elevator 16	Floor Tile			48			
Boiler Room	Pipe Insulation		157				
Offices	Floor Tile			1,757			
Women's Room	Floor Tile			144			
Main Hall	Floor Tile			275			
AC Fan Room	Pipe Insulation		15				
Women's Room	Floor Tile			144			
Janitor's Closet	Floor Tile			50			
		Total Category 5:	172	21,028			

TABLE 6.1

ACM ASSESSMENT CATEGORIZATION ADMINISTRATION BUILDING FORMER DELPHI INTERIOR & LIGHTING SYSTEMS PLANT FLINT, MICHIGAN

			Quantity		
Location/Column	Material		Linear Feet	Square Feet	
Assessment Category 6: ACBM with	n the Potential for Significa	nt Damage			
		Total Category 6:	0	0	
Assessment Category 7: Any remain	ning ACBM Suspected ACB	BM			
Garage	Pipe Insulation		75		
West End Offices	Floor Tile			6,500	
Conference Room	Pipe Insulation		100		
Boiler Room	Tank Insulation			200	
Boiler Room	Pipe Insulation		162		
AC Fan Room	Pipe Insulation		170		
		Total Category 7:	507	6,700	

APPENDIX A

LABORATORY ANALYTICAL REPORTS

APPENDIX B

ACM FIELD SURVEY NOTES