STATEMENT OF WORK

LEAD-BASED PAINT AND ASBESTOS-CONTAINING MATERIALS ABATEMENT AT FORT ALLEN TRAINING CENTER, PUERTO RICO

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Part 1

GENERAL INFORMATION

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PART 1. GENERAL INFORMATION

1.0 Background

According to Puerto Rico Department of Natural and Environmental Resources (PRDNER) Lead-Based Paint (LBP) and Asbestos-Containing Materials (ACM) Regulations, surfaces or substrates containing LBP and/or ACM must be abated or removed prior to the demolition of any structure. Therefore, the Puerto Rico Army National Guard (PRARNG) shall contract a certified professional or company to conduct the abatement of all identified LBP and ACM at Buildings 130 and 133, located at Fort Allen Training Center (FATC), Juana Diaz, Puerto Rico.

1.1 Objectives

To perform the complete and certified abatement of all identified LBP and ACM at Buildings 130 and 133 at FATC. This action is required to bring the facilities into full compliance with the Puerto Rico Department of Natural and Environmental Resources (PRDNER) regulations and to ensure they are safe for future demolition.

1.2 Description

The PRARNG shall contract a certified company to conduct a comprehensive LBP and ACM abatement for Buildings 130 and 133, to prepare the structures for future renovation or demolition. A mandatory site visit is required prior to proposal submission to verify existing conditions, and this visit will be coordinated by the Construction and Facilities Management Office (CFMO) Environmental Section. Throughout the project, the contractor is responsible for obtaining all necessary permits and certifications, paying all fees, and ensuring full compliance with all applicable local, state, and federal regulations, including PRDNER standards. Final payment is contingent upon the successful completion of all work and the submission of all project closeout documents, which must include the final inspection and abatement reports to PRARNG.

1.3 Location

Fort Allen Training Center – Buildings 130 and 133

1.4 Performance of Period

The work outlined in this Proposal shall be completed within **180 calendar days** from the date of Contract Agreement execution, following receipt of the service order by the contracted company.

Part 2

EXISTING CONDITIONS

2.0 Conditions and photographs

PART 2. EXISTING CONDITIONS

2.0 Conditions and specifications

Refer to Attachments 1, 2, and 3 for photographs and analytical results of the designated areas.

A. LBP identified at Building #130

Table 1: Summary of Components Containing Lead of Bldg. 130				
Area	**Component**	**Color**	**Substrate**	**Approximate Amount**
First Floor: 1-6 Second Floor: 2-2	Wall Tiles	Blue	Ceramic	281 ft^2
First Floor: 1-6 Second Floor: 2-2	Lavatory	White	Ceramic	2 Units
2-2	Bathtub	White	Ceramic	1 Unit

B. ACM identified at Building #130

Table 2: Summary of Components Containing Asbestos of Bldg. 130		
Area	**Component**	**Approximate Amount**
1st & 2nd Floor - RB-101108-AN23	Window Caulking	31 ea.
1st & 2nd Floor - RB-101108-AN21	Floor Tiles and Glue	1,568 sq ft.

C. LBP identified at Building #133

Table 3: Summary of Components Containing Lead of Bldg. 133				
Area	**Component**	**Color**	**Substrate**	**Approximate Amount**
First Floor: 1-2 Second Floor: 2-5	Wall Tiles	Pink	Ceramic	300 ft^2
2-5	Bathtub	White	Metal	1 Unit

D. ACM identified at Building #133

Table 4: Summary of Components Containing Asbestos of Bldg. 133		
Area	**Component**	**Approximate Amount**
1st & 2nd Floor - RB-101108-AN16	Floor Tiles and Glue	1,568 sq ft.

Part 3

ENVIRONMENTAL

3.0 Environmental Policy Statement

PART 3. ENVIRONMENTAL

3.0 Policy Memorandum # 01-26, Environmental Policy Statement (Attachment 4)

Part 4

SERVICES / PROJECT WORKS

3.0 Scope of Works
3.1 Technical Specifications

PART 4. SERVICE / PROJECT WORKS

4.0 Scope of Work

State and federal regulations mandate that a full LBP and ACM abatement is required prior to the demolition, renovation, or significant maintenance of any structure. This project is intended to fulfill this requirement for the designated area.

A. Lead-Based Paint and Lead-Dust Abatement

1. **Permits and Approvals:** Prepare and submit a General Permit application for LBP mitigation activities to the Puerto Rico Department of Natural and Environmental Resources (PRDNER)

2. Submit a detailed work plan to the Construction and Facilities Management Office (CFMO) Environmental Section for approval prior to submission to PRDNER. The Contractor must comply with EPA 40 CFR Part 745 (Lead-Based Paint Poisoning Prevention) and OSHA 29 CFR 1926.62 (Lead in Construction).

3. **Site Preparation:** Upon receiving PRDNER approval, prepare the project area as follows:

    a. **Isolation:** Delimitate, mark, and protect the boundaries of the work area using high-visibility warning tape, or similar, and physical barriers.

    b. **Identification:** Contractor shall identify and document all LBP to be cleaned, stabilized, or removed. Refer to analytical report (Attachment 3) for material quantity, location, and description.

    c. **Air and Environmental Monitoring:** Develop and implement a comprehensive air monitoring plan. This must include pre-abatement baseline testing, daily personal monitoring (breathing zone) to fulfill OSHA Negative Exposure Assessment (NEA) requirements, and daily area monitoring. Provide copies of all independent laboratory results to the PRARNG Environmental Section.

4. **Abatement Activities:** Perform LBP abatement activities in accordance with the approved work plan and all applicable federal and local regulations. Post-abatement dust-wipe testing shall comply with current EPA Dust-Lead Action Levels (DLAL), requiring lead dust levels to be below 5 µg/ft² for floors, below 40 µg/ft² for interior window sills, and below 100 µg/ft² for window troughs. If clearance levels are not achieved after initial abatement, the Contractor shall re-clean and re-test the area at no additional cost. If clearance continues to fail, the Contractor shall encapsulate all surfaces within the project area.

5. **Encapsulation/Sealant Alternate:** If applicable, prime and seal all designated surfaces within the project area with a liquid encapsulant product that complies with all applicable standards for permanent lead abatement, or an approved equal. Prime metal surfaces with a 100% acrylic rust-inhibitive primer prior to application. Minimum total dry film thickness shall be 7 mils (14 mils wet). Include all permit modification fees associated with this alternate in the proposal. Provide a fixed cost per square foot for this alternate.

6. **Waste Management and Disposal:** Perform Toxicity Characteristic Leaching Procedure (TCLP) testing on representative waste streams to characterize waste prior to disposal. Provide material transportation and disposal in accordance with PRDNER and Resource Conservation and Recovery Act (RCRA) regulations. If TCLP results exceed 5.0 mg/L, waste must be handled, manifested, and disposed of as RCRA hazardous waste. Provide copies of all hazardous waste manifests or non-hazardous disposal receipts to the CFMO Environmental Section.

7. **Project Closeout:** Provide permit closeout documents to the CFMO Environmental Section prior to final invoice approval. Documents must include the final report submitted to PRDNER, final dust-wipe clearance laboratory reports, TCLP data, and signed waste manifests.

B. Asbestos-Containing Materials Abatement

1. **Permits and Approvals:** Prepare and submit a General Permit application for Asbestos Removal to the PRDNER in accordance with the Asbestos Removal Guidelines of the Puerto Rico Regulation for the Control of Atmospheric Pollution (RCAP). Submit a detailed work plan, signed and stamped by a licensed Asbestos Project Designer, to the CFMO Environmental Section for approval prior to PRDNER submission. Concurrent with PRDNER submission, submit a National Emission Standards for Hazardous Air Pollutants (NESHAP) notification to the US EPA Region 2 at least 10 working days prior to the start of any asbestos disturbance or demolition activity.

2. **Site Preparation:** Upon receiving PRDNER and EPA approvals, prepare the project area as follows:

    a. **Containment:** Delimitate, lock, mark, and completely isolate the boundaries of the regulated work area using critical barriers and a minimum of two layers of 6-mil polyethylene sheeting.

b. **Signage:** Install danger and warning signage at all entry points in accordance with OSHA 29 CFR 1926.1101.

c. **Identification:** Contractor shall identify, verify, and document all Regulated Asbestos-Containing Material (RACM), Category I, and Category II non-friable ACM to be removed. Refer to analytical reports (Attachments 1 and 2) for material quantity, location, and description.

d. **Engineering Controls:** Establish a fully functional negative pressure enclosure (NPE) equipped with HEPA-filtered negative air machines to provide a minimum of 4 air changes per hour. A minimum of -0.02 column inches water pressure differential, relative to outside pressure, shall be maintained within the NPE as evidenced by manometric measurements. Install a multi-stage decontamination enclosure system for personnel and equipment.

e. **Environmental Monitoring:** Develop and implement a comprehensive air monitoring plan managed by an independent Puerto Rico-licensed Project Monitor. The plan must include pre-abatement (baseline), daily in-progress (area and personal), and post-abatement clearance sampling. Provide copies of all daily laboratory results to the PRARNG Environmental Section.

3. **Abatement Activities:** Perform ACM abatement activities utilizing wet-removal methods and HEPA-vacuuming in accordance with the approved project work plan, the Puerto Rico RCAP, 40 CFR 61 Subpart M, and OSHA 29 CFR 1926.1101. Post-abatement clearance levels shall be below 0.01 fibers per cubic centimeter (f/cc) of air. Clearance air sampling shall be conducted using aggressive sampling protocols. Analysis shall be performed using Phase Contrast Microscopy (PCM) via NIOSH Method 7400, or Transmission Electron Microscopy (TEM) via 40 CFR Part 763 (AHERA Rules) where mandatory based on project size thresholds. If clearance levels are not achieved, the Contractor shall re-clean, re-encapsulate, and re-test the area at no additional cost to the Government until compliance is met.

4. **Lockdown Encapsulant:** Prior to the execution of final clearance air sampling and while the containment remains under continuous negative pressure, the Contractor shall apply an approved, tinted (pigmented), water-based asbestos lockdown encapsulant to all abated substrates and structural surfaces within the regulated work area.

The encapsulant must be field-tested for substrate compatibility, applied using airless spray equipment per the manufacturer's specified coverage rates, and allowed to cure completely before aggressive air sampling begins. In no event shall containment barriers be dismantled before receiving a passing laboratory air clearance report.

5. **Waste Management and Disposal:** Provide material transportation and disposal in accordance with PRDNER and US EPA NESHAP regulations. All ACM waste must be adequately wetted to prevent fiber emission, double-bagged in 6-mil leak-tight plastic bags (or placed in leak-tight drum containers), and labeled with the required OSHA warning text, generator name, and the physical location site. Transportation must be conducted via a licensed hazardous waste transporter to an authorized, permitted landfill approved to accept asbestos waste. Provide fully executed, signed Waste Shipment Records (WSR) / EPA manifests to the CFMO Environmental Section within 30 days of the date the waste leaves the project facility.

6. **Project Closeout:** Provide permit closeout documents to the CFMO Environmental Section prior to final invoice submission. Documents must include evidence of the final report submitted to PRDNER, final air clearance laboratory results, daily logbooks, and completed waste manifests.

C. Qualifications

1. **Certified Personnel:** All work related to LBP and/or ACM abatement shall be performed by personnel who have successfully completed accredited training programs and hold valid, current certifications for the specific tasks they are performing. This includes, but is not limited to, Lead Abatement Worker, Lead Supervisor, Lead Inspector/Risk Assessor, Asbestos Abatement Worker, Asbestos Supervisor, Asbestos Inspector, and Asbestos Project Designer certifications as required by applicable EPA, OSHA, and PRDNER regulations.

2. **Documentation of Certifications:** The Contractor shall provide the PRARNG Environmental Section with copies of all personnel certifications prior to the commencement of any work. These certifications must be current and valid throughout the duration of the contract. The Contractor shall also maintain a current list of all certified personnel on-site during all abatement activities.

3. **Competency:** All personnel performing work, regardless of certification requirements, shall demonstrate competency in their respective trades and adhere to best practices.

D. Conditions

1. Ensure full compliance with all applicable federal and local regulations.

2. The Contractor is responsible for independently verifying and accurately measuring all areas included in the base bid. Any discrepancies must be reported to PRARNG prior to bid submission.

3. Coordinate with proponents to ensure their presence during all Contractor-conducted testing.

4. Ensure that final clearance samples results are below established clearance thresholds.

5. Dispose of all waste and excess material in full compliance with all current state and federal regulations. Provide documentation of proper waste disposal to the PRARNG Environmental Section.

6. As a minimum, all personnel entering the regulated area or conducting the decontamination of the project area shall be provided with, and required to use, the PPE in strict accordance with OSHA 29 CFR 1926.1101

7. The work area shall be isolated from the rest of the building by closing all doors except one designated as the work entrance/emergency exit. This entrance shall be kept closed during all clean-up operations but must provide unobstructed access to the outside in case of an emergency.

8. All personal protective clothing and equipment (except respirators) shall be removed strictly within the designated Equipment Room of the decontamination enclosure system. All disposable suits shall be immediately deposited into labeled, impermeable 6-mil waste bags. Workers shall then proceed directly into the decontamination room to thoroughly wash their hair and skin prior to removing their respirators. Workers must change into clean street clothing within the Clean Change Room before departing the regulated project area.

9. Workers will wash their hands thoroughly before eating, drinking or smoking. Food of beverages will not be consumed inside the working area.

E. Restrictions

1. The use of high-pressure water systems, hydro-blasting, compressed air, or dry abrasive blasting without a certified HEPA-shrouded vacuum containment system is strictly prohibited for all lead and asbestos-containing material (ACM) activities. Furthermore, dry sweeping, dry shoveling, and the use of non-HEPA filtered vacuum equipment are strictly prohibited. All cleaning and dust-suppression activities must utilize amended water (wet-wiping methodologies) and certified HEPA-vacuums to prevent the aerosolization and dispersal of toxic dust or fibers.

F. Cleaning of surfaces

1. In the absence of functioning mechanical ventilation systems, all doors and windows shall be sealed with appropriate materials to minimize fugitive emissions and maintain negative pressure within the work area.

2. Utilize a wet wipe system for cleaning and removal of lead dust from all surfaces. Wipes shall be disposed of as hazardous waste in accordance with applicable regulations.

3. Use a vacuum cleaner equipped with a HEPA filter to remove all excess material and residual dust. The vacuum cleaner shall be dedicated to this project and not used for any other purpose.

4. Clean floors starting from the furthest point form the exit and progressing towards the entrance/exit to prevent tracking of contamination.

5. Conduct a thorough visual inspection of all surfaces to identify any remaining dust following cleanup. Correct any identified deficiencies prior to conducting re-sampling for clearance.

G. Cleaning solution for wet wiping

1. Final wet-cleaning and dust decontamination shall be performed using a lead-specific specialty detergent or a high-efficiency all-purpose cleaner mixed in strict accordance with the manufacturer's printed specifications. If a phosphate-based cleaner is utilized, it must comply with all local PRDNER wastewater discharge limitations, and all treated surfaces must undergo a secondary, clean-water rinse to ensure zero residue remains before applying primers or encapsulants. Cleaning solutions shall be changed frequently (at a minimum of every 200 square feet or whenever the water becomes visibly discolored) to prevent the re-entrainment and cross-contamination of lead dust.

H. Equipment

1. The contractor shall identify and submit detailed literature (spec sheets, SDS) for all equipment and materials proposed for use in performing cleaning procedures. This submittal shall be included as part of the Work Plan and is subject to approval by the PRARNG Environmental Section prior to commencement of work. Submittals must include information demonstrating the equipment's suitability for lead and asbestos abatement activities.

I. Warranty

1. If any coatings are applied as part of this project, the Contractor shall provide the complete warranty documentation for the coating product, including the duration of the warranty, coverage details, and any limitations.

2. All warranties shall be transferable to PRARNG upon completion of the project.

J. Environmental Section Point of Contacts (POCs)

The Contractor will make sure to notify any environmental related decision with the Environmental Section. The notification shall be in the following order:

Mr. Johnathan Rodriguez
Environmental Specialist
Phone (787) 289-1400 ext. 1074
e-mail: johnathan.rodriguezvega.nfg@army.mil

or

LTC Brenda Acosta
Supervisory Environmental Protection Specialist
phone (787) 289-1400 ext. 1088
e-mail: brenda.l.acosta4.mil@army.mil

4.1 Technical Specifications

A. Site Visit

1. Prior to submitting the Proposal, the Contractor shall conduct a thorough site visit to verify existing conditions, assess the SOW, and identify any potential challenges or special difficulties. The Contractor is responsible for documenting site conditions and incorporating any relevant findings into their Proposal.

B. Utilities

1. The Contractor shall use existing electricity and potable water sources available at the facility whenever possible.

2. If the facility lacks adequate electricity or potable water, the Contractor is responsible for making all necessary arrangements to provide these utilities for the duration of the project, ensuring compliance with all applicable safety and environmental regulations. This includes obtaining any required permits or approvals.

3. The Contractor shall provide and maintain sanitary toilet facilities for their employees throughout the duration of the contract. These facilities shall be regularly cleaned and emptied in accordance with all applicable health regulations and local ordinances. Waste disposal from portable toilets shall be managed in a manner consistent with environmental regulations.

C. Project Requirements

1. The Contractor shall fully cooperate with the PRARNG's authorized representative, providing access to work areas and responding promptly to requests for information.

2. The Contractor shall strictly adhere to all PRARNG security regulations and procedures, including access control measures and reporting requirements.

3. Contractor's employees shall park only in designated areas as coordinated with the PRARNG.

4. All incidental areas disturbed by the Contractor's operations shall be restored to their original condition or better upon completion of the Project. A joint inspection, documented with before-and-after photographs, will be conducted with PRARNG's representative to verify restoration.

5. The Contractor shall be solely responsible for paying all fees, filing all notices, submitting all necessary documentation, and obtaining all permits and certifications of approval required to execute this SOW in full compliance with applicable laws and regulations.

6. The Contractor shall comply with all applicable laws, ordinances, regulations, and rules of government agencies having jurisdiction over this project.

D. Safety, Applicable Standards and Guidelines

All work shall be performed in strict accordance with applicable federal, territorial, and local regulations, standards, and codes governing lead/asbestos abatement and hazardous or otherwise regulated waste. The most recent edition of any regulation, standard, or code shall be utilized. In the event of conflicting requirements between regulations, standards, codes, or these technical specifications, the most stringent requirement, or that which provides the highest level of environmental and worker safety, shall govern.

E. License and Permits

The Contractor shall obtain and maintain in full force and effect all licenses, permits, and authorizations necessary to legally perform this demolition project. The Contractor shall provide the Project Manager with verifiable evidence of all required licenses, permits, and authorizations. This evidence shall be submitted subsequent to the contract award and prior to commencing any demolition work. All costs associated with obtaining and maintaining these licenses, permits, and authorizations shall be included in the Contractor's proposal.

Specifically, the Contractor shall obtain, at a minimum, the following:

1. PRDNER General Permit for Asbestos Removal.

2. PRDNER General Permit for Lead-Based Paint Mitigation Activities

Part 5

GENERAL REQUIREMENTS

5.0 Contract Requirements

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5.0 Contract Requirements

A. **Operating hours:** All services must be performed during the PRARNG facility's operating hours, which are Monday through Friday, 0730 – 1145 and 1245 – 1600. The Contractor is responsible for ensuring all onsite activities are completed within these timeframes.

B. **Holidays:** The Contractor shall account for both Federal and Commonwealth of Puerto Rico holidays. Significant dates for consideration include:
   a. July 4 – Independence Day
   b. September 7 – Labor Day
   c. October 12 – Columbus Day/Indigenous People's Day
   d. November 11 – Veterans Day
   e. November 19 – Día de la puertorriqueñidad
   f. November 26 – Thanksgiving Day
   g. December 25 – Christmas Day

C. **Coordination and Site Access:** Insert the Name, Title, Phone Number, and Email of the Point of Contact (POC) who will be coordinating site access and abatement schedules here.

D. **Administrative Lead Time:** A period of ten (10) working days is required for the administrative processing and authorization of facility access. This lead time must be completed prior to the scheduled start date of any onsite services.

A. **Regulatory Compliance:** The Contractor shall comply with all applicable local, state, and federal laws and regulations regarding ACM and LBP services.

B. Equipment: The Contractor is solely responsible for providing all necessary equipment and tools required to safely inspect all areas.

B. Upon completion of the services, the company must submit its invoice for collection with the following certification:

"I certify under penalty of nullity that no public servant of the Puerto Rico Army National Guard will derive or obtain any benefit of profit of any kind form the contractual relationship which is the basic of this invoice. If such benefit or profit exists, the required waive has been obtained prior to entering into the agreement The only consideration to be received in exchange for the delivery of goods or for the services provided is the agreed-upon price that has been negotiated with an authorized representative of the Puerto Rico Army National Guard. The total amount shown on this invoice is true and correct. The services have been rendered, and no payment has been received."

Part 6

CODES AND REGULATIONS

6.0 Applicable Codes and Regulations

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The Contractor must adhere to, but is not limited to, the following regulations:

A. Federal Laws and Regulations (U.S. Environmental Protection Agency - EPA)

- **40 CFR Part 61, Subpart M**: National Emission Standards for Hazardous Air Pollutants (NESHAP)
- **40 CFR Part 763, Subpart E**: Asbestos Hazard Emergency Response Act (AHERA)
- **40 CFR Part 745, Subpart L**: Lead-Based Paint Activities
- **40 CFR Parts 260 through 272**: Resource Conservation and Recovery Act (RCRA)

B. Federal Occupational Safety and Health Administration (OSHA)

- **29 CFR 1926.1101**: Asbestos Standard for the Construction Industry
- **29 CFR 1926.62**: Lead in Construction Standard
- **29 CFR 1910.134**: Respiratory Protection Standard
- **29 CFR 1910.1200**: Hazard Communication Standard

C. Federal Housing and Urban Development (HUD)

- **24 CFR Part 35**: HUD Lead Safe Housing Rule

D. Local Puerto Rico Laws and Regulations (PRDNER & PR-OSHA)

- **Puerto Rico Regulation for the Control of Atmospheric Pollution (RCAP)**
- **PRDNER Reglamento #9098**: Reglamento para el Manejo Adecuado de Actividades de Pintura con Base de Plomo
- **PRDNER Reglamento #5742**: Reglamento para el Manejo de los Desperdicios Sólidos No Peligrosos
- **Puerto Rico Law No. 16-1975**: Ley de Seguridad y Salud en el Trabajo

Part 7
ATTACHMENTS

Attachment 1

Bldg. 130 ACM Report

Attachment 2

Bldg. 133 ACM Report

Attachment 3

Bldg. 130 and 133 LBP Report

Attachment 4

Policy Memorandum # 01-26, Environmental Policy Statement