



February 10, 2025

South Carolina Office of Resilience
632 Rosewood Drive
Columbia, South Carolina 29201

Attention: Ms. Shauna Webb, Infrastructure Project Manager
Shauna.Webb@scor.sc.gov

Reference: **Proposal for Asbestos Assessment and Project Design**
USS Yorktown – Compartment A-9E
Patriots Point Naval and Maritime Museum
Mount Pleasant, South Carolina
S&ME Proposal No. 24130479A

Dear Ms. Webb:

S&ME, Inc. (S&ME) is pleased to submit this proposal to provide an asbestos assessment and written project design to support planned abatement activities, limited to the referenced compartment. This proposal is provided based on your request to Terry Richburg (S&ME) via email on February 5, 2025. This proposal describes our understanding of the work, our proposed scope of service, and fees. If authorized, the applicable portion of work will be conducted in accordance with the State of South Carolina STC for Asbestos/Lead Paint/Mold Collection and Testing Contract No. 4400034379 (May 19, 2024 to May 19, 2029) between S&ME and the State of South Carolina.

◆ Background

On February 5, 2025, you contacted Mr. Richburg by email and requested a proposal for an asbestos assessment and written project design, limited to the interior of compartment A-9E at the USS Yorktown located at 40 Patriots Point Road in Mount Pleasant, South Carolina. Based on the information provided, we understand that there is an estimated 3,000 linear feet of potential asbestos containing pipe insulation in the subject compartment, which is tentatively scheduled to be removed and disposed. The purpose of the proposed service is to assess, identify, provide recommendations, and prepare a written project design to properly remove, transport and dispose asbestos containing materials (ACMs) in the subject compartment to prevent worker exposures, emissions and properly dispose of the subject materials.

The Environmental Protection Agency (EPA) requires asbestos survey assessments, conducted by EPA accredited individuals, prior to renovation and/or demolition projects, regardless of the age of the materials or date of construction. The applicable EPA regulations, enforced by District IV and the South Carolina Department of Environmental Services (SCDES), include Code 40, part 61, subpart M, Final Rule National Emissions Standards for Hazardous Air Pollutants (NESHAP), and Asbestos in Schools Hazard Abatement Reauthorization Act (ASHARA) which applies to public buildings. The EPA and SCDES also require verification and update of asbestos assessment reports greater than three years old, prior to renovation or demolition.



◆ Scope of Service

S&ME offers to perform the following Basic Services as part of this proposal:

Asbestos Assessment

S&ME will perform the tasks related to the asbestos assessment, limited to the interior of compartment A-9E, using EPA accredited inspectors. A visual assessment and sampling strategy will be developed per SCDES and EPA guidelines. We estimate up to **20** bulk sample layers analyzed by Polarized Light Microscopy (PLM) and up to **four** bulk sample layers analyzed by Transmission Electron Microscopy (TEM). Bulk samples will be extracted and submitted to an asbestos laboratory for identification of asbestos type and content in accordance with Title 40 Code of Federal Regulations Chapter 1 (1-1-87 edition), part 763, subpart F.

As required by the SCDES, suspect non-friable organically bound materials (i.e. floor tiles, vinyl sheet flooring, mastics, caulking, glazing, etc.) exhibiting negative results by PLM analysis will be analyzed by TEM, one sample of the representative negative material in accordance with ASTM E2356. The analytical laboratories that will be used are accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) which is administered by the National Institute of Standards and Technology.

Upon completion of the fieldwork and receipt of bulk sample analyses, a written report will be provided which will include the procedures used, bulk sample analysis results, findings, drawing noting location of confirmed ACM(s) and bulk samples, and conclusions and recommendations. Drawings provided by SCOR will be modified to exhibit bulk sample locations and confirmed ACMs in the subject area.

Abatement Project Design with Drawings

S&ME will develop the SCDES required Project Design, prepared and submitted as an Abatement Project Design with construction drawings, to support removal and disposal of ACMs in the project area. The design will address State and Federal regulations applicable to removal, transportation and disposal of regulated ACMs. Diagrams will be provided to exhibit the locations and quantities of the ACMs, along with construction notes. S&ME will also review the contractor's required submittals detailed in the design, if requested. The design will be prepared by a Project Designer licensed by SCDES.

It is our understanding that SCOR will be responsible for procurement actions including Division 1 requirements, solicitation, evaluation of bids, and selection of the successful bidder. We also understand SCOR has already contracted with a contractor for abatement activities and S&ME is already contracted to conduct required onsite asbestos air monitoring.

◆ Exclusions

Without attempting to be a complete list or description of all services or potential services excluded from this proposal and not performed by S&ME, the following services are specifically excluded:



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- Lead-based paint assessment;
- Repair of sampled materials;
- Asbestos assessment of the entire ship;
- Equipment that may contain asbestos but would require dismantling or other disassembly to access it unless such equipment is identified and disassembled by the client; and
- Asbestos abatement project management or supervision.

◆ **Fees**

We propose a total estimated fee of **\$6,043** for the Basic Services detailed in the Scope of Service, based on the following contractual unit rates and additional services:

Task 1: Asbestos Assessment

State Contract Rates #4400034379

Asbestos Inspector: 10 hrs @ \$95/hr.....	\$950
Asbestos Report Preparation: 10 hrs @ \$90/hr.....	\$900
*PLM Analysis: 20 sample layers (24-hr turnaround) @ \$21/layer.....	\$420
*TEM Analysis: 4 sample layers (24-hr turnaround) @ \$87/layer.....	\$348
Subtotal.....	\$2,618

****Additional Services**

Senior Review: 1 hr @ \$215/hr.....	\$215
CAD Operator: 2 hrs @ \$105/hr.....	\$210
Subtotal.....	\$425

Task 1 Total **\$3,043**

Task 2: Project Design with Drawings

****Additional Services**

Project Designer: 12 hrs @ \$215/hr.....	\$2,580
CAD Operator: 4 hrs @ \$105/hr.....	\$420

Task 2 Total **\$3,000**

Total Estimated Fee **\$6,043**

**Client will only be invoiced for the actual number of samples analyzed.*

***Additional Services and associated rates are not included in the referenced State Contract. The additional services are necessary to satisfy SCOR's project goals.*



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◆ **Schedule**

We are prepared to initiate fieldwork for the assessment (Task 1) within one week following receipt of your written authorization and complete fieldwork in one day, provided unencumbered access is available. The PLM results will be available the day after samples are received by the laboratory and TEM confirmation results will be provided one additional day following receipt of PLM results. The written report will be provided one week following completion of field activities.

We are available to provide the written project design and drawings (Task 2) two weeks following submission of the assessment report, following your written authorization.

◆ **Limitations**

The assessment is limited in nature and does not include significant destructive methods, therefore suspect ACMs that are not visible and accessible, such as inside pipe chases and wall cavities or under flooring overlays, may not be included in this work.

This proposal is solely intended for the Basic Services as described in the Scope of Service. The Scope of Service may not be modified or amended, unless the changes are first agreed to by the client and S&ME. Use of this proposal and resulting documents, including the final report, are limited to the referenced project and client. No other use is authorized by S&ME.

◆ **Authorization**

If authorized, the applicable portion of work will be conducted in accordance with the State of South Carolina STC for Asbestos/Lead Paint/Mold Collection and Testing Contract No. 4400034379 (May 19, 2024 to May 19, 2029) between S&ME and the State of South Carolina.

◆ **Closing**

S&ME appreciates the opportunity to provide you with our industrial hygiene services. If you have any questions concerning this proposal, please call us at (843) 884-0005.

Sincerely,

S&ME, Inc.

A handwritten signature in blue ink, appearing to read 'Josh B. Veloso'.

Josh Veloso
Associate Industrial Hygienist

A handwritten signature in blue ink, appearing to read 'Eric Fosmire'.

Eric Fosmire
Chief of Staff & General Counsel

A handwritten signature in blue ink, appearing to read 'Terry W. Richburg'.

Terry W. Richburg
Operations Manager – Industrial Hygiene

From: Elizabeth K. Herring <Elizabeth.Herring@des.sc.gov>
Sent: Wednesday, February 5, 2025 1:11 PM
To: Kendrick, Pamela <Pamela.Kendrick@scor.sc.gov>; Jennifer L. Boryk <Jenn.Boryk@des.sc.gov>
Cc: Webb, Shauna <Shauna.Webb@scor.sc.gov>; Lewis, Phleisha <Phleisha.Lewis@scor.sc.gov>
Subject: Re: [External] Yorktown remediation project-asbestos

Good afternoon,

Thank you for explaining a little further on the plan for this next remediation phase. The expectation for this next phase would be that prior to any building material being disturbed that a license asbestos inspector (S&ME) would provide an inspection report then the abatement contractor (HEPCO) would apply for a permit with the correct notification period which is determined by type of material and quantity. If that is what will be followed with no variation to the regulation, then we are ok since the regulatory requirements will be met. If a deviation is needed then we need to see up a meeting. Please understand the documents that have been provided (GEL Documents) do not meet the regulatory requirement and cannot be accepted in their current start.

The expectation of an asbestos survey prior to renovation comes from REG. 61-81.6 Section 6.A.1.

"A. Applicability. 1. Prior to beginning a renovation or demolition operation at any facility, the facility owner and/or owner's representative shall ensure that an asbestos building inspection is performed to identify the presence of ACM"

Thank you,

Elizabeth Herring
Asbestos Program Specialist
Bureau of Air Quality
O: 803.898.4270
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DES.SC.gov