

EXHIBIT L

CITY OF MARCO ISLAND SOIL REMOVAL OF SITE "C" ELKCAM CIRCLE AND JOY CIRCLE

ASBESTOS ABATEMENT WORK PLAN

WORK PLANS PREPARED BY:
American Management Resources Corporation
5230 Clayton Court
Fort Myers, FL 33907
(239) 936-8266

The following document is a work plan for the removal of soil with asbestos cement pipe debris. The work area is located at the corner of Elkcam Circle and Joy Circle in Marco Island, Florida.

The work area is as follows: Area 1, Approximately 175-200 feet adjacent to Elkcam Circle and then inward to the property approximately 25 feet. The work area will be excavated down a minimum of 24 inches. Area 2, Within the Elkcam Circle right of way, between the pavement edge and the sidewalk, the top 6-12 inches of soil and the small area of dumped asphalt will be removed (locating of all underground utilities shall be conducted prior to starting work). Area 3, Further soil removal will be conducted on an as-needed basis.

The Contractor is expected to utilize all appropriate controls and work practices considered necessary to prevent further breakage of the material and to prevent unnecessary occupational or environmental exposure. The work plan shall be considered as minimal guidelines for the project with the expectation that the Contractor selected shall be competent in utilizing appropriate controls and work practices to protect the workers, the public and the City of Marco Island (Owner).

The primary concern and consideration of these work practices is the protection of human health and the environment, as well as to minimize the Owner's liability for exposure before, during and after the abatement process.



INDEMNITY

The Contractor shall indemnify, defend and hold the Owner harmless against all damages, losses, and claims resulting from the activities, or lack of activities associated with the project. The Contractor shall defend on behalf of the Owner, severally, or Owner and Contractor jointly, any claim or action for or arising out of the foregoing.

INSURANCE

The Contractor shall carry insurance to protect both Contractor and Owner from all losses, expenses and liabilities resulting from any loss, injury or damage. The minimal amounts shall be according to the contracted amounts. (Separate agreement with Owner.)

REGULATIONS, CODES AND STANDARDS

The Contractor shall comply with all regulations, codes and standards. These shall include, but are not limited to:

1. Title 29, Code of Federal Regulations, Section 1910, 1926, and 1926.1101. Occupational Safety and Health Administration, US Department of Labor.
2. Title 40, Code of Federal Regulations, Part 61, Subparts A and M, National Emission Standards for Hazardous Air Pollutants. US Environmental Protection Agency (EPA).
3. State of Florida's Administrative Code Rule 17-2.670, Appendix C. USEPA National Emission Standards for Hazardous Air Pollutants (NESHAPS) Asbestos Regulations (40 CFR 61, Subpart M).
4. Section 53. Chapter 469, Florida Statutes, consisting of section 469.001 through 469.015.
5. State of Florida, Collier County, and City of Marco Island codes and ordinances as applicable.



CONSULTANT

The Owner will Employ: American Management Resources Corporation (AMRC), 5230 Clayton Court, Fort Myers, Florida 33907, herein after referred to as the Consultant. The consultant's scope of services shall be as follows;

1. The Consultant will be the Owner's representative during the subject abatement project. The Consultant will advise and consult with the Owner. The Owner's instructions to the Contractor will be forwarded through the Consultant.
2. The Consultant will be present at the site on a daily basis. The consultant shall maintain an excavated material volume log. This will be accomplished by recording each loaded container, its capacity, truck license number and time of departure from the work area.
3. The Consultant shall not have control over, nor responsible for means, methods, techniques in regards to the work.
4. The Consultant shall have access to the work site at all times.
5. Invoices and all appropriate closeout documents will be routed through the Consultant at the successful completion of the project.

AIR MONITORING AND TESTING LABORATORY

The Owner will employ as required:

American Management Resources Corporation (AMRC), Fort Myers, Florida for the purpose of air monitoring and Phase Contrast Microscopy (PCM)

Materials Analytical Services (MAS), Suwannee, Georgia, for the purpose of TEM and PLM analysis.

Air monitoring requirements will be determined at the preconstruction meeting and documented accordingly. At a minimum area and personal sampling will be conducted throughout the project. All results will be submitted to both the Contractor and the Owner, via the Consultant.

SAFETY



The Contractor shall be responsible for the safety of all work procedures and equipment on the job site, and shall take all necessary safety precautions before, during and after the project. This includes, but is not limited to, signs, barricades and equipment.

Should any incident, accident or injuries occur, the Contractor will notify the Owner/Consultant immediately.

PRECONSTRUCTION MEETING

1. Prior to commencing work, a preconstruction meeting will be held for the purpose of reviewing the project. In attendance should be representatives of the Owner, Consultant, and Contractor, as well as others deemed appropriate.
2. Prior to commencing work, a joint walk through will be held for the final review and clarification of project requirements.
3. Appropriate notifications will be filed and Owner copies provided to the Consultant in compliance with all Regulations previously noted.

CONTRACTOR STAFFING

1. The Contractor will have only properly trained and certified personnel on the job site, during abatement.
2. It shall be required that a "Competent" supervisor be inside the work area, at all times once work has commenced.
3. Certifications of workers and supervisor will be available for Owner review and copy, and shall be submitted with the standard closeout documents.

PERSONAL PROTECTIVE EQUIPMENT

The project shall begin with workers within Area 1 wearing half face respirators fitted with P-100 filters. After personal air sampling of all the workers monitored show a consistent fiber concentration below the OSHA Permissible Exposure Limit (PEL), respirator use may be discontinued at the discretion of the Contractor. Area and personal air monitoring will continue throughout the project. If during the work fiber concentrations exceed the PEL of 0.1 f/cc work shall stop and corrective methods shall be employed to reduce the fiber levels below the PEL.



GENERAL PROCEDURES

Please note that the following work procedures should be considered the minimum necessary to begin the remediation process. Changes as the work is in progress can and will be made as necessary in the field.

CLEARANCE OF THE WORK AREA

At the completion of the work no visible cementitious pieces shall be present within the work area. The consultant will collect soil and air samples from within the work area. The laboratory analysis shall have no asbestos fibers present and area air samples shall show fiber counts that are less than 0.01 f/cc.

Asbestos Containing Debris and Soil

NOTE: Locating all underground utilities shall be conducted prior to starting work. The contractor will contact Sunshine State One Call of Florida 800-432-4770. The contractor shall not disturb the burrowing owls that have nested on the site. No heavy equipment shall go into the designated protective area as marked by the orange barrier.

1. At the entrances to the work area asbestos warning signs shall posted. Unauthorized persons are not allowed in the delineated work area.
2. Prior to the start of work all employee training certificates, respirator fit test, medical exam and worker acknowledgment shall be submitted.
3. The work area shall be made adequately** wet prior to disturbance of the cementitious debris and soil. This should be accomplished using multiple hoses with water control nozzles and separate sprinkler heads. Once the soil and debris have been made adequately wet, the work area should be maintained in this manner until the completion of the abatement project. Water shall be provided to the contractor at no cost.

** Adequately wet = Prevent the release of visible emissions, but not to make the soil so wet that it is causing migration of the soil to areas outside of the work area.

4. A front-end loader or a similar type of equipment will scoop the material and carefully place the soil into a leak-tight waste container. At no point shall dry



soil or debris be excavated. If observed during the excavation the work will stop and not begin until the soil is made adequately wet.

The initial excavation work period shall be for 30 minutes only. This short term period will be for the 30 minute excursion airborne fiber sampling. If the analysis of the short term exposure is less than 1 f/cc, work may resume using the same work practices. If the short term fiber levels exceed 1 f/cc corrections shall be made to the work procedures until this can be achieved. Employee exposure to asbestos must not exceed 0.1 f/cc of air averaged over an 8-hour work shift. Rotating employees to achieve compliance with either PEL is prohibited by OSHA.

5. The waste container shall have appropriate signs to comply with OSHA and DOT standards. The contractor will be responsible for transporting the containers to the Collier County Landfill. Disposal fees will be the responsibility of the City of Marco Island. All trip tickets shall be submitted by the contractor with the closeout documents.
6. The operator of the front-end loader shall be appropriately trained and competent to work around asbestos hazards.
7. Care shall be taken during the use of the heavy equipment at the site with a specific emphasis on NOT driving over the broken pieces and rendering them friable.
8. During the removal process, the regulated work area and soil should be intermittently inspected for asbestos debris.
9. Remove waste ACM to secured storage area pending disposal in a designated asbestos waste facility.
10. Once the asbestos-containing material has been removed, the contractor will perform a joint inspection for completeness with the Consultant. After the inspection, soil and air sample analysis will be performed to assess the area for completeness. Analysis of the soil samples will take multiple days at the laboratory.
11. The Contractor shall transport all soil to the Collier County Landfill located at 3901 White Lake Blvd., Naples, Florida 34116.
12. The Contractor shall provide the consultant with manifest ticket issued by the landfill facility for each load of soil delivered to the landfill site.
13. The County will designate where the material from Areas 1, 2 and 3, shall be



placed. Material from Area 3 will be stored separately from the materials removed from Areas 1 and 2.

14. The Contractor shall remove the material from Areas 1 and 2 first.
15. The Contractor shall insure that the area identified as "Burrowing Owl Site" is not impacted by the work performed.