



"It's about more than just resolving problems.....it's about creating solutions"

April 2, 2020

Don Buffoni
Procurement & Sustainability
Commercial Cleaning Systems
1485 South Lipan Street
Denver, CO 80223

Subject: CIH Review of Biorisk Response and Recovery Plan

Dear Don:

Commercial Cleaning Systems was contracted by Element Building Sciences (Element) to review the Commercial Cleaning Systems (CCS) Biorisk Preparation, Response, and Recovery Program that was provided to us on March 18, 2020. This letter summarizes our observations and recommendations based on the plan provided.

Element performed the initial review on March 18th and returned a response on March 19th. On March 31, 2020, Element engaged our third-party CIH, Craig Synder, PE, CIH, CSP a Principal EHS Consultant at H&A, Inc.

BACKGROUND

Element requested assistance of Craig Synder to review the aforementioned CCS protocol for building and equipment cleaning and sanitation associated with potential or actual contamination by the COVID-19 virus. Specifically, a client of Element's requested that review of the CCS program be performed by a Certified Industrial Hygienist (CIH).

ASSESSMENT SCOPE AND METHODS

Element provided Craig Synder the cleaning protocol document file, 2.1.8 CCS Biorisk Response & Recovery Program for review, as well as reference to associated standards from the Centers for Disease Control and Prevention (CDC) and the Occupational Safety and Health Administration (OSHA). The CDC and OSHA standards reportedly served as a baseline for safety and health aspects associated with development of the cleaning protocol. Additionally, a link to Environmental Protection Agency (EPA) disinfectants for use against the COVID-19 virus was provided.

Craig Snyder, CIH, and Principal Environmental Health and Safety (EHS) Consultant, reviewed the CCS cleaning protocol and has provided separate to this document a tracked change word version of the document with comments and recommended edits for incorporation. While the

changes are minor, we believe warranted and further provides clarity.

ADDITIONAL OBSERVATIONS AND FINDINGS

In addition to the references provided by CCS for baseline EHS information, Element submits the following:

Cleaning and Disinfection for Community Facilities Interim Recommendations for U.S. Community Facilities with Suspected/Confirmed Coronavirus Disease 2019 (COVID-19)
<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html>

The specific link for the EPA website List N: Disinfectants for Use Against SARS-CoV-2 follows and was different than that provided by Element
<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>

Disinfection products used for building surface and equipment cleanup and recovery must conform to the EPA list and be used in accordance with manufacture and product label.

Application methods and contact times must be sufficient to provide adequate disinfection in accordance with listing and labeling. The EPA has stated that “inclusion on this list does not constitute an endorsement by EPA.” Similarly, Element makes no recommendations for specific product use or effectiveness.

CONCLUSION AND RECOMMENDATIONS

Edits provided in the separately provided file: “2.1.8 CCS Biorisk Response & Recovery Program (Craig edits)” should be incorporated by CCS. Additionally, comments provided in that file should be reviewed and either incorporated or implemented in order to meet standard guidance requirements.

LIMITATIONS AND EXCLUSION OF WARRANTY

This assessment was performed using procedures and a level of diligence typically exercised by professional consultants performing similar services. The conclusions and recommendations presented herein cannot take into account hidden or changed conditions, activities that might not occur at the time of the assessment, evidence of adverse conditions that might not be present at the time of the assessment, or possible inaccuracies of information supplied to us by others that might have a material bearing on the findings, conclusions, and recommendations contained herein.

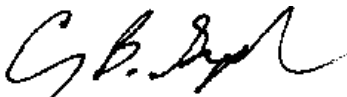
The procedures used for this assessment attempt to establish a balance between the competing goals of limiting investigative costs and time and reducing the uncertainty about unknown conditions. Therefore, because the conclusions in this report were derived within project scope, cost, time and other limitations, the conclusions should not be construed as a guarantee that all safety and health hazards that exist at the subject property are included in this report.

No warranty or guarantee, expressed or implied, is made regarding the findings, conclusions or recommendations contained in this report. The limitations presented above supersede the requirements or provisions of all other contracts or scopes of work, implied or otherwise, except those stated or acknowledged herein.

Thank you for the opportunity to provide assistance with this project. If you have questions, please contact me directly at (720) 379-4750 at your convenience.

Sincerely,

Letter Prepared by and CCS Report Reviewed by:

A handwritten signature in black ink, appearing to read 'C. B. Snyder', written over a horizontal line.

Craig B. Snyder, PE, CIH, CSP
Principal EHS Consultant

Attachment 1: 2.1.8 CCS Biorisk Response & Recovery Program (H&A edits) (provided separately)

ATTACHMENT 1
2.1.8 CCS BIORISK RESPONSE & RECOVERY PROGRAM (H&A EDITS)
(PROVIDED SEPARATELY)